



January 10, 2023

Iowa Utilities Board

1375 E. Court Ave.

Des Moines, IA 50319-0069

To Whom It May Concern,

We, the members of the City Council for the City of Waverly, submit to you this letter of objection to the proposed Navigator Heartland Greenway LLC pipeline project, which has been slated to be constructed through Bremer County.

After careful study and discussion regarding this proposed pipeline, we have serious concerns about the impact that such a pipeline would have on our county and the community of Waverly. The following points summarize our reasons for opposing the project:

---We have significant concerns about the potential risks to the safety of our community's residents, should a pipeline rupture occur. As you are aware, the potential escape of highly pressurized, concentrated CO2 gas from a rupture could rapidly and catastrophically injure and/or kill untold numbers of people in its path. The proposed pipeline route would be positioned dangerously close to two new elementary schools which are currently being built in Waverly, in addition to countless existing homes, businesses and institutions.

---Neither the efficacy or safety of this type of CO2 sequestration has yet been adequately studied or documented, nor has the Federal Government had time to complete development of adequate safety regulations for them.

---We believe that the presence of this pipeline, in its currently proposed iteration, would have significant deleterious effects on the economic vitality of our community. Its proximity to the City of Waverly, and even more so our Future Land Use Plan, would most certainly have a

negative impact on the potential for future businesses and residents to expand or locate in and around Waverly.

---In a time when small communities like ours are already struggling to maintain adequate quality EMS services, this proposed pipeline would dramatically increase the burden on those essential services. The presence of such a pipeline would add increased burden in the form of additional hazardous materials training and increased potential risk to essential EMS personnel, factors which could easily break what is already a tenuous emergency response system in our rural communities. Despite suggestions that the private developers of the pipeline might help to compensate for such burdens, we would argue that we can find no evidence that what they might contribute could begin to balance out the risks involved.

---We do not feel that the stated potential benefits of this pipeline come close to justifying the enactment of Eminent Domain, which would be necessary for acquiring use of our area's valuable agricultural land. We believe that, whereas Eminent Domain exists to allow use of private property for the greater good of the public, this project would instead benefit primarily its private investors.

We, as the City Council of the City of Waverly, Iowa, respectfully ask that you give careful consideration to this input, and vote to deny the application for the Navigator Heartland Greenway LLC pipeline project.

Sincerely,

CITY OF WAVERLY



Adam P. Hoffman, Mayor

Enclosures: Resolution approving letter in objection

## Resolution 23-06

A Resolution Approving a Letter of Objection to the Iowa Utilities Board, voicing objection to Navigator's request for approval from that body which (if approved) would allow construction as proposed.

WHEREAS, proponents of the pipeline argue that CO2 sequestration via the pipeline would help mitigate the environmental impacts of excess CO2 in our atmosphere. CO2 is a byproduct of the manufacturing process of biofuels, which are a big business in Iowa. The federal Inflation Reduction Act of 2022 has made available some tax incentives for businesses to decrease their carbon footprint, and the developers of these pipelines argue that they are facilitating such efforts; and

WHEREAS, opponents of the pipeline argue that there are no substantive studies showing that this type of CO2 sequestration is significantly effective, that a private enterprise such as Navigator has not shown sufficient public benefit to justify the exercise of eminent domain (which would be necessary for the pipeline to traverse private agricultural lands), and that the risk to public health and welfare, the well-being of our rich agricultural lands, wildlife, and future economic development outweigh any potential benefits of the pipeline; and

WHEREAS, a potential rupture of the pipeline would allow dissemination of highly pressurized CO2 gas into the local atmosphere. CO2 in high concentrations rapidly displaces oxygen and becomes an asphyxiant to all breathing organisms in the immediate area of the leak. Exposure to and inhalation of it would cause immediate disorientation and rapid demise. The displacement of oxygen can also cause any emergency vehicles and/or equipment which require oxygen to function, to become completely disabled; and

WHEREAS, the proposed path of the pipeline is dangerously close to Waverly's two new elementary schools, and likewise to what is expected to be new housing developments in those areas. Once a pipeline is built, future growth and development in the corridor will be curtailed, likely impacting the availability of housing and the growth of the community's tax base; and

WHEREAS, the potential for such incidents will affect how close people and businesses want to be to the pipeline which will in turn affect their economic decisions such as whether to buy or sell property in the pipeline corridor and the price at which those transactions occur; and

WHEREAS, the coexistence of abundant underground tiling that is present on our county's farmland and the proposed pipeline system may contribute to potential instability of both types of structures, possibly adding to the risk of a dangerous pipeline fracture. This will impact both farmers and future development; and



WHEREAS, there is only one other pipeline of this type in existence in the U.S. thus far, and the federal government has not yet completed exhaustive studies into the safety and efficacy of such pipelines, nor had time to develop adequate safety regulations for them. It would be prudent to keep all hazardous liquid pipelines a sufficient distance away from existing land uses, and this is especially the case where the federal government is still studying and evaluating the safety regulations applicable to such pipelines; and

WHEREAS, opponents of the pipeline argue that there are no substantive studies showing that this type of CO2 sequestration is significantly effective, that a private enterprise such as Navigator has not shown sufficient public benefit to justify enactment of eminent domain (which would be necessary for the pipeline to traverse private agricultural lands), and that the risk to public safety, the well-being of our rich agricultural lands, wildlife, and future economic development outweigh any potential benefits of the pipeline; and


NOW, THEREFORE BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF WAVERLY, IOWA:

to approve a Letter of Objection to the Iowa Utilities Board, voicing objection to Navigator's request for approval from that body which (if approved) would allow construction as proposed.

PASSED AND ADOPTED this 9<sup>th</sup> day of January, 2023.

  
Adam P. Hoffman, Mayor

ATTEST:

  
Carla Guyer, City Clerk



200 First Street NE  
P.O. Box 616  
Waverly, IA 50677

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