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EI-1795
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November 23, 2005

Christa Dean
Section of Environmental Analysis
Surface Transportation Board
1925 K Street NW
Washington, DC 20423

Dear Ms. Dean:

This letter is in response to a proposed 250 ft. rail extension in Keokuk, IA, by Roquette America, Inc. I have done my best to address each of the bulleted items you requested responses to in your letter to SEIRPC in the attached pages.

As a side comment, I might suggest that in the future the Surface Transportation Board include a more detailed map of proposed projects. The USGS topo map was inadequate for identifying the general alignment of the project. However, I discussed the project with Eric Tibbens of Roquette and was able to identify the alignment of the proposed rail project.

If you have further questions, please contact me at your earliest convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Norris".

Mike Norris
Transportation Director

Southeast Iowa Regional Planning Commission Comments on Proposed Rail Extension in Keokuk, IA for Roquette America

Local Land Use

Comments: Land use around the Roquette plant is mixed, including industrial, residential and recreational. North of the plant are established residential areas. These areas benefit from a natural bluff that shields them from some of the plant's activity. The predominant land use around the Roquette plant and the proposed rail spur is industrial. The rail spur would be consistent with the existing land use.

Concerns: None

Existing Transportation System

Comments: With two street accesses, a barge facility and two rail lines, the Keokuk Junction and Burlington Northern, the Roquette facility is well-served by several modes. The addition of the 250 foot rail spur will only enhance the existing system and enable Roquette to be more efficient with moving its raw material and finished goods.

Concerns: None

Air emissions and ambient air quality

Comments: The addition of a short, connecting rail spur should not adversely affect air emissions or ambient air quality in the immediate area. As opposed to utilizing trucks to move raw materials and finished goods, the rail spur would certainly emit fewer pollutants and be better for ambient air quality.

Concerns: None

Energy use

Comments: Roquette's business involves utilizing high volumes of raw materials to complete their finished products. The sheer amounts of raw material necessitate the use of high-capacity, low energy transportation. Adding a rail line is the most efficient, most feasible mode Roquette could use in transporting its products.

Concerns: None

Water quality and wetlands

Comments: The proposed rail spur will not conceivably affect water quality or wetlands due to the highly developed nature of the surrounding area.

Concerns: None

Ambient noise levels

Comments: Given that Roquette is an industrial facility housing hundreds of different processes it is likely that the addition of a rail spur will not add to the current industrial noise levels associated with the plant.

Concerns: None

Historic sites, archaeological sites or cultural resources

Comments: Due to the highly developed nature of the Roquette facility, any history, archaeology or cultural resources have likely been previously mitigated or have been dealt with in an appropriate manner.

Concerns: None

Socioeconomics

Comments: The proposed rail spur project should have a positive effect on employment for Roquette. The more efficient a company can be, the more resources it can put into other aspects of its operation, including employment.

Concerns: None

Threatened and endangered species

Comments: Again, due to the highly developed nature of the Roquette facility and the surrounding area, adverse effects to threatened or endangered species are highly unlikely.

Concerns: None

Additional Issues:

From the perspective of a regional planning commission, this is a very positive project. Any transportation improvement that can enhance a company's bottom line that is not at public expense should be encouraged and applauded. Roquette is a very valued member of southeast Iowa's business community and its desire to make itself more efficient through a transportation improvement makes it an example for others to follow.