

**PUBLIC PARTICIPATION RESPONSIVENESS SUMMARY
FOR IOWA'S 2018
SECTION 303(d) LIST OF IMPAIRED WATERS**

**IOWA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL SERVICES DIVISION
WATER QUALITY BUREAU
WATER QUALITY MONITORING & ASSESSMENT SECTION**

February 21, 2020

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Introduction:

The following constitutes a summary of the Iowa Department of Natural Resources’ (Iowa DNR) responses to the comments received in response to the draft 2018 Section 303(d) list of Impaired Waters as developed by the Iowa DNR. Notice of availability of the draft 2018 list was released for public review and comments on November 14, 2019 following a press conference phone call. A transcript of the press conference phone call can be provided upon request. In addition, notice of the availability of the list was posted on the Iowa DNR’s Twitter feed on November 18, 2019 (<https://twitter.com/iowadnr/status/1196472893338771456>) and in an Iowa DNR news release on November 14, 2019 (<https://www.iowadnr.gov/About-DNR/DNR-News-Releases/ArticleID/2731/DNR-releases-draft-2018-impaired-waters-list-open-for-public-comment>). Additional materials for the draft 2018 list were available on the Iowa DNR’s “impaired waters” website (<https://programs.iowadnr.gov/adbnet/Assessments/Summary/2018>). Public comments were accepted from November 14 through December 28, 2019. As distributed for public comment, Iowa DNR’s draft 2018 Section 303(d) list included 622 water segments with a total of 831 impairments.

This responsiveness summary provides a discussion of the issues raised by the comments received and how the comments were incorporated into the development of Iowa DNR’s final Integrated Report and Impaired Waters List.

Changes made to Iowa’s final 2018 Integrated Report:

For the final 2018 Integrated Report, two additional segments were assessed (Table 1). These changes to the Iowa DNR’s final 2018 Integrated Report did not affect the total number of impaired waterbodies or the total number of impairments.

Table 1. Additions to the Iowa DNR’s final 2018 Integrated Report.

ADB Code	Waterbody Name	Location Description	Potentially Impaired Use	Potentially Impaired Use Category	Overall IR Category
IA 03-SSK-947	East Indian Creek	MOUTH TO TRIB S34,T85N,R22W STORY CO.	Class A1, Primary Contact Recreation	3b - Use potentially impaired based on an evaluated assessment.	3 - Insufficient data exist to determine whether any designated uses are met.
IA 03-SSK-954	Squaw Creek	MOUTH (S12, T83N, R24W, STORY CO.) TO CONFLUENCE WITH UNNAMED TRIBUTARY IN NW 1/4, S9, T85N, R25W, BOONE CO.	Class A1, Primary Contact Recreation	3b - Use potentially impaired based on an evaluated assessment.	2 - Some of the designated uses are met but there is insufficient data to determine if remaining designated uses are met.

Responses To Comments Received On The 2018 Impaired Waters List:

The Iowa Department of Natural Resources acknowledges and thanks all for their comments on the 2018 Impaired Waters List.

COMMENTER 1: Dan Haug, Prairie Rivers of Iowa

Date Received: Dec 16, 2019, e-mail

Comment:

comments on 2018 draft impaired waters list

1 message

Dan Haug <dhaug@prccd.org>
To: Daniel.kendall@dnr.iowa.gov

Mon, Dec 16, 2019 at 3:24 PM

Dear Mr. Kendall,

Prairie Rivers of Iowa recommends that Squaw Creek (IA 03-SSK-954) and East Indian Creek (IA 03-SSK-947) be added to the Waters in Need of Further Investigation (WINOFI) list.

Prairie Rivers, Story County Conservation, and the City of Ames monitored these creeks on a biweekly basis during the recreational season of 2016 (and continuing in 2017 and 2018), with samples processed by the City's certified lab. More than ten temporally independent samples were collected from each creek during the 2016 recreational season, all of which showed *E. coli* in excess of the single sample maximum of 235 MPN/100mL. The seasonal geomean for both streams was over 1000 MPN/100mL, indicating a severe impairment.

Since the data was not collected under a DNR-approved quality assurance plan, we hope the Department will add these waters to the WINOFI list until we can provide assurance that our data is credible or the DNR is able to conduct its own water quality monitoring. The 2016 lab reports and a data summary are attached in a zipped file.

Based on our information, *E. coli* levels in Squaw Creek and East Indian Creek are considerably worse than nearby waters on the Impaired List--including Hickory Grove Lake, the upper South Skunk River, Indian Creek, and Long Dick Creek. Even if listing decisions do not result in a TMDL for these waters in the near future, we think it is important to fill in the gaps in the Integrated Report so that local groups can better prioritize conservation and monitoring efforts, and so that citizens can take appropriate precautions when recreating.


Thank you for your consideration,

--

Dan Haug ♦ Watershed Educator

Prairie Rivers of Iowa ♦ 501(c)(3) Non-Profit
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 comments on 2018 impaired waters.pdf
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Iowa Department of Natural Resources

Attn: Dan Kendall

Water Quality Monitoring & Assessment Section

Wallace State Office Building

502 East 9th Street

Des Moines, Iowa 50319

Daniel.kendall@dnr.iowa.gov

Dear Mr. Kendall,

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Thank you for your consideration,

Daniel Haug

Watershed Educator

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a 501(c)(3) not-for-profit organization

Iowa DNR Response:

The Iowa DNR has reviewed the data supplied by Prairie Rivers and agrees with the recommendation to add the segments, Squaw Creek ([IA 03-SSK-954](#)) and Indian Creek ([IA 03-SSK-947](#)), to the Waters in Need

of Further Investigation (WINFOI) list for *E. coli*. Because the data were collected and processed by a state certified laboratory, but without the other required quality controls in place, the potential impairment will be listed as “evaluated” instead of “monitored” on the state’s WINFOI list because it does not meet the state’s credible data law. Adding these water bodies to the WINFOI list will allow the Iowa DNR to target new locations for sampling in the future as additional funding becomes available to expand the ambient stream monitoring program.

COMMENTS 2: John Hylton, Environmental Engineer, Arconic Inc.

Date Received: Dec 18, 2019, e-mail

Comment:

Arconic Inc Comments on the Draft 2018 Impaired Waters List

1 message

Hylton, John A <John.Hylton@arconic.com>

Wed, Dec 18, 2019 at 12:35 PM

To: "daniel.kendall@dnr.iowa.gov" <daniel.kendall@dnr.iowa.gov>

Cc: "Hylton, John A" <John.Hylton@arconic.com>

Mr. Kendall

Greetings, in accordance with instruction found on the Iowa Department of Natural Resources website, am contacting you to submit comments on the Draft 2018 Iowa Impaired Waters List on behalf of Arconic Inc. Please see the attached letter containing our comment submittal.

Thank you and if you have any questions pertaining to this matter, please do not hesitate to contact me.

John Hylton

Environmental Engineer

Arconic - Davenport Works & Satellites

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 Comments on 2018 Water Quality Assessment.pdf
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12/18/19

Iowa Department of Natural Resources
Water Quality Monitoring & Assessment Section
502 East 9th Street
Des Moines, IA 50319
Attn: Dan Kendall

Nandu Srinivasan
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Davenport Works and Satellite Facilities
Nandu.Srinivasan@arconic.com
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4879 State Street
Davenport, IA 52722

Arconic Inc.
Draft Iowa 2018 Water Quality Assessment
Public Comments

This letter is submitted by Arconic Inc. Davenport Works (Arconic) to provide comment on the Draft of Iowa's 2018 Impaired Waters List and Draft Methodology for Iowa's 2018 Water Quality Assessment, Listing, and Reporting Pursuant to Sections 305(b) and 303(d) of the Federal Clean Water Act prepared by the Iowa Department of Natural Resources (IDNR).

Arconic has reviewed this draft list and methodology and requests that the following points be taken under consideration.

Methodology for Assessment of Water Quality Attainment for Toxic Metals

Arconic believes that the current water quality standards which form the basis of waterbody use assessments is overly conservative with regards to toxic metals, particularly aluminum. Current standards, as outlined under the Iowa Water Quality Standards, express these criteria in terms of total recoverable metals. The use of total recoverable metals overstates the actual toxicity present due to the fraction of metals found within the water column which are not bioavailable. This matter is discussed in detail within EPA's Office of Water Policy and Technical Guidance on Interpretation and Implementation of Aquatic Life Metals Criteria, Memorandum from Martha Prothro (1993). Current water quality standards also express the numerical criteria for aluminum at a set threshold, despite the variable nature of this metal's toxicity due to ambient water conditions. The EPA has updated its Final Aquatic Life Criteria for toxic metals, including Aluminum. These metals, with the exception of aluminum, are expressed as dissolved metals. The Aluminum criterion was updated in 2018, which expresses aluminum toxicity as a function of hardness, pH, and dissolved organic carbon.

Arconic believes that the use of the current standards has led to the designation of one or more assessed waterbodies as impaired which, when evaluated against a standard using the toxicity of bioavailable concentrations of metals, would not be considered impaired. The listing of these waters as impaired conflicts with public and private interests due to impacts on: calculation of effluent limits which rely on water quality standards and attainment status during the NPDES permitting process, allocation of resources on water quality improvement initiatives for waters that are not impaired, and the negative impact on the perception of water quality by individuals.

Iowa has developed draft amendments to the state's water quality criteria to reflect the EPA's standards. We believe that these new standards represent the best scientifically available



information. Arconic supports adoption of water quality standards which expresses metal concentrations in terms of their dissolved or bioavailable fraction, and which considers the toxicity of this bioavailable fraction under ambient waterbody conditions.

Arconic requests that, once adopted, these revisions in water quality standards be taken into consideration for revision water quality assessments as soon as may be feasible.

2018 Pending Assessment for the Mississippi River at IA 01-NEM-62

Arconic has reviewed the Pending Assessment for the Mississippi River at IA 01-NEM-62 on ADBNet, Water Quality Assessments Impaired Water List, Last Updated 7/30/19, and found discrepancies between the narrative Documentation and the Draft 2018 Assessment Methodology.

Paragraph 4 of the Assessment Explanation indicates that the threshold for chronic non-attainment of toxic water quality criteria is established as exceedances of more than 10% of collected samples during a 3-year period. This threshold was last used in the 2010 assessment cycle and was changed during the 2012 assessment cycle as no more than 1 exceedance of a chronic toxic water quality criteria during a 3-year period. The current thresholds for use attainments assessments are found in Table 9 of the Draft Methodology for Iowa's 2018 Water Quality Assessment. Arconic seeks clarification on which threshold is intended to establish attainment for chronic toxicity.

If you have any questions concerning these comments, please contact John Hylton at 563-459-3208.

Sincerely,



Nandu Srinivasan
Manufacturing Director
Davenport Works and Satellite Facilities

Iowa DNR Response:

In cooperation with stakeholders and with ongoing communication with the US EPA, the Iowa DNR has developed and is in the process of proposing new aluminum standards. To be effective under the Clean Water Act, these standards must be adopted by rulemaking into Iowa Administrative Code (IAC) and approved by the US EPA. Proposed standards are used for assessment cycles only after their adoption and approval. It would be inappropriate to use any proposed new standard that has not yet been adopted for assessment, so the aluminum standards currently in IAC 567 Chapter 61 must be used for the assessment cycle at this time.

With regards to the comment on paragraph 4, the Iowa DNR thanks Arconic for catching the wording error in assessment of the Mississippi segment [IA 01-NEM-62](#). The segment was assessed according to current methodology which was similar to the previous assessment cycles starting in 2012. Both the count of violations for the chronic and acute were compared to the greater than one violation standard as in previous assessment cycles. The assessment text has been updated to better reflect how aluminum data was assessed.

COMMENTS 3: Michael Schmidt, Staff Attorney, Iowa Environmental Council

Date Received: Dec 20, 2019, e-mail

Comment:

Comments on Impaired Waters List

1 message

Michael Schmidt <schmidt@iaenvironment.org>

Fri, Dec 20, 2019 at 2:00 PM

To: "daniel.kendall@dnr.iowa.gov" <daniel.kendall@dnr.iowa.gov>

Cc: Ingrid Gronstal <Gronstal@iaenvironment.org>, Alicia Vasto <vasto@iaenvironment.org>

Mr. Kendall:

Attached please find comments from the Iowa Environmental Council regarding the DNR's draft 2018 impaired waters list. Please let me know if you have any questions regarding our comments. Thank you for the opportunity to comment.

Sincerely,

Michael Schmidt


Michael Schmidt

Staff Attorney | Iowa Environmental Council

505 Fifth Avenue, Suite 850 | Des Moines, IA 50309

P: 515-244-1194 x211

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 IEC comments - 2018 303d draft list 28Dec2019.pdf
218K



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December 20, 2019

Iowa Department of Natural Resources
Attn: Dan Kendall
502 East 9th Street
Des Moines, IA 50319

RE: Draft 2018 List of Impaired Waters

Dear Mr. Kendall:

The Iowa Environmental Council ("Council") offers the following comments on the draft 2018 list of the Section 303(d) impaired waters. These comments represent the views of the Iowa Environmental Council, an alliance of 75 organizations, at-large board members from business, farming, the sciences and education, and over 500 individual members.

GENERAL COMMENTS

The Council makes the following general comments about the draft 2018 impaired waters list:

- **A high proportion of assessed waters are impaired.**
Despite the DNR's insistence that the number of impaired waters only increased 2% from the 2016 to 2018 lists, the proportion of assessed waters listed as impaired remains steady at 54%. Waters are not being removed from the list at a reasonable rate, nor has there been a serious effort on behalf of the state to write TMDLs, enact them, and improve the waters enough for them to be considered for removal. Instead, the DNR expects Iowans to accept that more than half the waters of the state are impaired for one or more of their designated uses. This indicates that the state does not take seriously its duty to protect water quality for Iowans. **The Council calls on the state to take stronger leadership to improve Iowa's water quality and reduce the number of impairments to a manageable level.**
- **A high proportion of state public beaches are on impaired waters.**
Of Iowa's state public beaches, 90% (35 of 39) are on waters that are impaired for recreational use. Public lands and waters are owned by the people under the care of the state. **The state has done an inadequate job of protecting public lands and waters for public use.**
- **DNR has not addressed the microcystin criterion recommended by EPA.**

The EPA has issued a recommendation for a microcystin water quality standard that would protect recreational users. The DNR has not addressed or adopted the criterion. **To identify waters impaired for microcystin, DNR should take steps to address the cause of the impairments by writing and enacting TMDLs, and to protect the health and safety of Iowans, IEC urges DNR to adopt the EPA recommended criterion for microcystin.**

- **Delay in release of the draft list means that Iowans are reviewing out-of-date data and impairments.**

By law, the final 2018 list was required to be submitted to EPA by April 1, 2018. The draft list was released more than nineteen months later on November 14, 2019. By law, the 2020 list must be submitted to EPA in less than four months on April 1, 2020, and a draft list has not been released for comment.

The 2018 draft list uses data from 2012-2016 to assess new impairments or remove impairments. The DNR methodology claims data more than five years old are too old to be valid for this round of listing because they may no longer reflect the conditions of the waters.¹ However, DNR's delay in developing the impaired waters list means the list does not consider the three most recent years of monitoring data. Iowans reviewing the draft 2018 list are looking at data from three or more years ago. Therefore, Iowans are not able to confidently use the 303(d) list to assess the safety or potential health risks associated with their local waterways.

For example, the City of Greenfield experienced a bottled water advisory in the summer of 2018 due to cyanobacteria contamination of its source water, Lake Greenfield. In the 2018 assessment, Lake Greenfield remains unassessed for Class C Drinking Water use. Greenfield residents cannot look at the 2018 assessment and expect reliable information about their drinking water source. They also cannot expect that DNR will write a TMDL to help improve their drinking water source anytime in the near future.

DNR is not meeting its legal obligation to submit the 303(d) list by the statutory deadline, leaving Iowans in the dark about the status of their waters and putting them at risk.

DETAILED COMMENTS ON SPECIFIC ASSESSMENTS

The Iowa Environmental Council completed detailed reviews of the DNR assessment information for all state public recreational beaches. Based on our review, we have identified several waterbodies where we question the DNR conclusions.

Our observations and comments on these assessments are as follows:

¹ "Methodology for Iowa's 2018 Water Quality Assessment, Listing, and Reporting Pursuant to Sections 305(b) and 303(d) of the Federal Clean Water Act." Iowa DNR (Oct. 2019) at 11 (citing EPA guidelines for submission of 305(b) integrated reports).

- **Recreational lake impairment omissions, including Big Creek Lake, Clear Lake, and Green Valley Lake. DNR did not identify these Class A1 recreational waters as impaired for recreational use due to cyanobacteria.**

DNR has listed several Class A1 recreational lakes as impaired for aquatic life uses due to cyanobacteria, but not impaired for recreational use. These lakes include Big Creek Lake, Clear Lake, and Green Valley Lake.

Beach advisories, documented below for the assessment period, provide evidence that recreation is in fact being limited by cyanobacteria blooms caused by excess nutrients. Without a standard for microcystin, these impairments are potentially being left off the list at the risk of Iowans.

Beach Name	Number of Beach Advisories For Microcystin Each Year				
	2012	2013	2014	2015	2016
Big Creek Lake Beach	5			1	
Clear Lake Beach	1				
McIntosh Woods Beach (Clear Lake)	1		3		
Green Valley Lake	3	2	1	9	7

By DNR’s own admission in the Assessment Explanation for Clear Lake and Green Valley Lake, the criteria for cyanobacteria impairment is “arbitrarily” set at the 75th percentile of the distribution.² This means that lakes are compared to each other and not against a clear and objective standard. The lack of clear criteria makes it impossible to accurately identify impairments due to cyanobacteria, and the DNR admits to a “lower level of confidence” in the impairment it has assigned for cyanobacteria.

For Big Creek Lake, the explanation for biological impairment due to cyanobacteria states, “Based on information from the DNR Fisheries Bureau, large cyanobacteria blooms have formed on the lake every summer in recent years and it has deterred recreation.”³ Nevertheless, Big Creek Lake does not have an impairment for recreational use due to cyanobacteria, only an impairment for Class B (WW-1) aquatic life use.

We urge the DNR to list Big Creek Lake, Clear Lake, and Green Valley Lake as impaired for Class A1 recreational use due to cyanobacteria.

² ADBNet. “Clear Lake: Assessment Explanation,” Iowa DNR, (updated May 2019). Available at <https://programs.iowadnr.gov/adbnet/Assessments/3511>; “Green Valley Lake: Assessment Explanation,” Iowa DNR, (updated Mar. 2019). Available at <https://programs.iowadnr.gov/adbnet/Assessments/3523>.

³ ADBNet. “Big Creek Lake: Assessment Explanation,” Iowa DNR, (updated Jan. 2019). Available at <https://programs.iowadnr.gov/adbnet/Assessments/3503>.

Additionally, DNR should adopt the EPA recommended standard for microcystin. It is unacceptable to have an unclear and arbitrary standard for an impairment that puts the health and safety of Iowans at risk.

- **Drinking water use continues to be unassessed despite serious risks posed by microcystin, including Geode Lake, Green Valley Lake, and Rock Creek Lake.** DNR is not assessing drinking water uses where there is documentation of cyanobacteria in Class C designated waters. Beach advisories, documented below for the assessment period, demonstrate that there is data available to assess the Class C use and provides evidence that drinking water use could be at risk. Without an assessment and without a drinking water standard for microcystin, these impairments are potentially being left off the list at the risk of Iowans.

Beach Name	Number of Beach Advisories For Microcystin Each Year				
	2012	2013	2014	2015	2016
Geode Lake Beach		6	1	1	1
Green Valley Lake	3	2	1	9	7
Rock Creek Lake	1	3			1

The recreational narrative standard for cyanobacteria is based on accidental ingestion. As a drinking water source, these waters should be assessed more stringently than what is outlined by the narrative recreational standard. Cities in Iowa have had stop providing public water due to cyanobacteria outbreaks, as was the case in Greenfield in the summer of 2018. DNR has not provided information that microcystin would be removed through the water treatment process for these drinking water sources.

The cumulative five-year monitoring data from these lakes further supports the need for assessment and listing. The lakes have exceeded EPA's recommended criterion for microcystin more than 10 percent of the time, and in fact the five-year average exceeds EPA's recommended criterion at each of the lakes.

Waterbody	Microcystin Samples, 2012-2016	Microcystin samples > 8 µg/L	% samples > 8 µg/L	Microcystin, 5-year average (µg/L)
Geode Lake State Park	80	19	24%	8.2
Green Valley Lake State Park	79	36	46%	14.4
Rock Creek Lake State Park	80	14	18%	11.7

None of the three lakes has been assessed for Class C, Drinking Water.

DNR should adopt a microcystin standard for Class C Drinking Water and assess these waters for Class C use.

Several lakes have very high average concentrations of chlorophyll-a free of pheophytin that exceed DNR's guidance for listing based on the trophic status index.⁴ In some cases, DNR has assessed these lakes for an aquatic life use but has not listed the lakes as impaired for recreation. IEC suggests DNR use the information it has available to make this assessment and find the following lakes to be impaired.

Waterbody	Chlorophyll-a Samples, 2012-2016	Chlorophyll-a samples > 35 µg/L	% samples > 35 µg/L	Chlorophyll-a, 5-year average (µg/L)
West Twin Lake	20	19	95%	123.2
High Lake	10	8	80%	100.3
Morse Lake	10	9	90%	151.1

In addition, adopting numeric nutrient criteria would resolve many of the issues outlined above. The lack of clear standards has created uncertainty and low confidence in the completeness and accuracy of the assessments. Iowans deserve numeric standards, as most other states in the Midwest have adopted to protect citizens' health and quality of life. **We urge the Environmental Protection Commission to begin rulemaking on numeric nutrient criteria for Iowa.**

We expect to see the draft 2020 list in the coming weeks and gain a better understanding of the actual current conditions of Iowa's waters.

Thank you for the opportunity to comment on the draft 2018 impaired waters list. If you have questions or I can clarify these comments further, please feel free to call me.

Sincerely,

/s/ Michael Schmidt

Michael Schmidt
Staff Attorney
Iowa Environmental Council

⁴ Methodology at Attachment 3.

Iowa DNR Response:

The Iowa DNR thanks the Iowa Environmental Council for their general and specific comments to the 2018 Impaired Waters list and methodology. With respect to the general comments, the Iowa DNR continues to support robust ambient stream monitoring, ambient lake monitoring, randomized stream biological assessment sampling, and beach human health surveillance programs.

In March of 2019, the US EPA issued recommendations for recreational water quality criteria and swimming advisories for cyanotoxins, which included magnitudes (i.e., cyanotoxin concentrations) along with guidance for selecting frequency and duration for the criteria. The Iowa DNR, along with other state agencies, submitted comments during the public comment period for this document. The finalized recommended criteria, issued in May of 2019, allows for adoption as state criteria and/or as swimming advisory thresholds, but states are not mandated to adopt the recommended criteria in either capacity. The Iowa DNR is currently reviewing the recommended criteria to decide on further future action on the subject.

The Iowa DNR interprets the due dates issued in the memorandum containing information concerning the submittal of the 2018 Clean Water Act Sections 303(d), 305(b), and 314 Integrated Reporting and Listing Decisions, released by the US EPA on December 22, 2017, to be a recommendation. The memo states that “The EPA and states should continue to make best efforts to provide on-time IR submittals (all 56 states and Territories by April 1, 2018), with EPA action on the states’ CWA Section 303(d) lists within 30 days of their submission” (https://www.epa.gov/sites/production/files/2018-01/documents/final_2018_ir_memo.pdf).

Additionally, the memorandum states that “This memo is not a regulation and does not impose legally binding requirements on EPA or the states.” With the current staffing resources and a desire to include all available data for the current assessment cycle, the Iowa DNR feels it applied best efforts to provide the 2018 Integrated Report as early as possible. The Iowa DNR Integrated Report staff are continuing to improve processes in order to complete and submit the IR by the EPA suggested submittal date.

Based on methodology, the Impaired Waters list will always be based on historical data and not the most current data. This is due to an acknowledgement that it takes time to analyze data by both internal and external agencies and ensure proper quality control and quality assurance to support listing decisions. The most up-to-date information on state waterbodies that the Iowa DNR currently samples can be found on the state water quality database AQUIA (<https://programs.iowadnr.gov/aquia/>).

With respect to the general comment about the City of Greenfield drinking water bottled water advisory due to a possible cyanobacteria contamination of the water source, an understanding of cyanobacteria and the timeline for obtaining results of water testing (which ultimately showed that no cyanotoxins were present) are important to contextualize the bottled water advisory. Cyanobacteria, which are often referred to as blue-green algae, are microscopic organisms that are naturally present in all aquatic ecosystems, ranging from hypersaline to freshwater environments, and are important components of food webs and the nitrogen cycle. Cyanobacteria can form blooms that sometimes produce cyanotoxins. City of Greenfield issued a bottled water advisory in response to turbidity above the drinking water standards at the water plant and the presence of a possible cyanobacteria (blue-green algae) bloom at Greenfield Lake. Turbidity measures cloudiness, which is analyzed to determine if the system is effectively filtering the water supply. Normally, turbidity issues would trigger a boil water advisory due to possible bacteria in the system. However, in an overabundance of caution, the Iowa DNR along with City of Greenfield issued a bottled water advisory due to the possibility of cyanotoxins in the source water (with cyanobacteria present) and the fact that it would take time to get results back from the laboratory testing for cyanotoxins. Results from laboratory testing ultimately showed that there were no cyanotoxins present in the samples taken on the day of the event. Related to the assessment of Greenfield Lake, the Class C drinking water use remains unassessed due to a lack of additional information. The only parameter collected as part of the ISU lake surveys relevant to support of Class C (drinking water) uses is nitrate. While the results of the ISU surveys from 2012-2016 show that nitrate levels are extremely low in this lake (maximum value = 1.2 mg/l; median = 0 mg/l), the Iowa DNR does

not find these data sufficient for developing a valid assessment showing “full support” of the Class C uses since only one parameter, nitrate, was sampled.

With respect to the specific comment on “recreational lake impairment omissions, including Big Creek Lake, Clear Lake, and Green Valley Lake,” the Iowa DNR disagrees with the Iowa Environmental Council on the need to add Big Creek Lake, Clear Lake, and Green Valley Lake to the Category 5 list for Class A1 due to cyanobacteria. The initial statement that the “DNR has listed several Class A1 recreational lakes as impaired for aquatic life uses due to cyanobacteria, but not impaired for recreational use” is incorrect. Cyanobacteria listings in Category 3, Waters in Need of Further Investigation (WINOFI), are potential impairments and not Category 5 or 4 impairments. While the U.S. EPA does accept these Category 3 assessments from the state, these assessments are not actually tracked or added to their national database (ATTAINS). During the assessment period, the Iowa DNR collected cyanotoxin (toxin produced by cyanobacteria also known as blue-green algae) data at the beaches for advisory purposes. While the US EPA has released their “Recommended Human Health Recreational Ambient Water Quality Criteria or Swimming Advisories for Microcystins and Cylindrospermopsin” document (<https://www.epa.gov/sites/production/files/2019-05/documents/hh-rec-criteria-habs-document-2019.pdf>), at this time the Iowa DNR along with IDPH is currently reviewing these proposed recreational criteria and swimming advisory values. At this time it would be inappropriate to apply criteria that has not been adopted into state administrative code. While it is true that Clear Lake and Green Valley Lake have been added to the Category 3 Waters in Need of Further Investigation (WINOFI) list for cyanobacteria and its potential influence on aquatic life uses and not recreational uses, these are not Category 5 impairments. Currently, there are no standards in any states that address the total wetmass of cyanobacteria. Additionally, the Big Creek assessment is appropriately placed on the WINOFI list as it is only based on anecdotal information of perceived bloom size from the Iowa DNR Fisheries Bureau and not physical or analytical metrics. Advisories at Big Creek due to cyanotoxins were fewer during the 2018 (2014 through 2016) assessment cycle at beaches compared to the 2016 (2012 through 2014) assessment cycle. The Category 3 listing was maintained from the previous cycle; however, it will likely be removed during the next assessment cycle if conditions continue to improve.

With respect to the specific comment on “Drinking water use continues to be unassessed despite serious risks posed by microcystin, including Geode Lake, Green Valley Lake, and Rock Creek Lake,” the Iowa DNR disagrees with the Iowa Environmental Council’s comment that these system are not assessed for cyanobacteria in drinking water. First, it would be inappropriate to apply a recreational criteria as drinking water criteria because the values proposed in the recreational criteria are based on direct consumption of raw water from the lake, associated ingestion rates, and other factors specific to recreation. Additionally, guidance for implementation of drinking water health advisories for cyanotoxins include recommendations that differ from recommendations in the recreational criteria for assessment/swimming advisories because water treatment facilities may remove or adjust operations to remove cyanotoxins (e.g., through filtration of intact cells, filtration with granular activated carbon, chlorination). The value in finished drinking water is the driving force behind issuing do not drink/do not boil advisories. It is not appropriate to apply the recreational water quality criteria to Class C designated waterbodies. If the US EPA were to develop Class C cyanotoxin criteria for raw surface water, the Iowa DNR would evaluate the information and consider adopting the criteria.

With respect to the specific comment on “Several lakes have very high average concentrations of chlorophyll-a free of pheophytin that exceed DNR’s guidance for listing based on the trophic status index. In some cases, DNR has assessed these lakes for aquatic life use but has not listed the lakes as impaired for recreation. IEC suggests DNR use the information it has available to make this assessment and find the following lakes to be impaired,” the Iowa DNR disagrees with the Iowa Environmental

Council on the need to add West Twin Lake, High Lake, and Morse Lake to the Category 5 list for Class A1 due to chlorophyll a. These systems are not designated for Class A1 primary contact, so it would be inappropriate to assess these shallow lake systems for those uses.

The Iowa DNR has utilized narrative criteria to assess waterbody segments based on response variables like the Carlson TSI for Chlorophyll a and the Carlson TSI for Secchi transparency. The Iowa DNR continues to collect and analyze lake nutrient data as part of the ambient lake monitoring and the lake restoration programs. The development of quantitative indicators of lake health, including nutrient status, remains a high priority within these programs. Iowa, along with the states of Utah, Connecticut, and Oklahoma, continue to partner with EPA to provide data for and to test new nutrient models that were developed using national datasets. After expressing interest in participating, Iowa was selected as one of the case studies given the extensive datasets available for Iowa Lakes and the commitment in the Iowa Nutrient Reduction Strategy for the continued assessment and development of suitable nutrient criteria as a long-term goal.

Progress to date includes using national and Iowa data to estimate chlorophyll-a and microcystin relationships. Preliminary results have shown that combining state and national data can improve the performance of these new models. The documentation and review of the underlying science is now completed, and the research behind this effort, titled “Combining national and state data improves predictions of microcystin concentration,” was published in 2019 (Yuan, et. al., 2019). EPA is expecting to release the draft lake numeric nutrient criteria that incorporates this research in addition to other pending research publications in early 2020.

References

- US. EPA. 2017. Information concerning 2018 Clean Water Act Section 303(d), 305(b), and 314 integrated reporting and listing decisions. Memorandum of December 22, 2017 from John Goodin, Acting Director /s/, Office of Wetlands, Oceans and Watersheds to Water Directors of Regions 1-10. 2 p. (https://www.epa.gov/sites/production/files/2018-01/documents/final_2018_ir_memo.pdf)
- Lester L. Yuan, Amina I. Pollard. (2019). Combining national and state data improves predictions of microcystin concentration. Elsevier, Harmful Algae 84 (2019), 75-83.

COMMENTS 4: Wayne Buchholtz, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Fwd: Act Today: Submit comments on Iowa's impaired waters by 12/28

1 message

w.buchholtz@mchsi.com <w.buchholtz@mchsi.com>

Fri, Dec 20, 2019 at 3:15 PM

To: daniel kendall <daniel.kendall@dnr.iowa.gov>

Cc: iecmail@iaenvironment.org

Mr. Kendall, I recently received information in regards to Iowa's Waters, Streams, Rivers, Lakes, Reservoirs. The list is frightening and hard to except. Our Lakes and Streams have been impaired for decades. Not just a few years, but decades. When I was young, 50 years ago, you could drink from a creek or play in a lake with out concerns. I worked for State Parks for over 36 years. In the 1980's there were problems, but not like they are today. Algae, manure runoff, erosion, septic systems and more all getting into Iowa's waters. What has been done? Very little. Volunteer programs have been the result of most, What can be done?. Well, that is not working. Those that want to voluntarily change their land have done that and we still have the problems. The State of Iowa needs to create laws that first make it mandatory and inviting. This would apply to land owners from all walks of life. Residential, rural, urban, farmers, corporations etc. No exceptions. The water has to be cleaned up. Problems in the Gulf of Mexico have been traced back to Iowa. This is shameful. We should be proud of how the land is taken care of and used.

Secondly, I would like to address Catfish Creek Watershed in Dubuque Iowa. The creek is often looked as one creek with minor tributaries feeding in. In reality there are five creeks. Main Catfish Creek, South Branch Catfish Creek, Middle Branch Catfish Creek, North Branch Catfish Creek and to the south Granger Creek. They all should have equal attention. Often the Main Catfish Creek gets all the attention since it is considered a cold water stream. IE Trout Stream. All five of the creeks should be addressed. The north and south are urban creeks to the most part. The south, main and Granger are rural creeks. Each has its own problems. Each has its own concerns. All should be looked at as one system, not five. Additionally, the five branches converge and all flows thru the Mines of Spain State Recreation Area. This part is used as a fishery, canoeing, kayaking, swimming, etc. People use it. People want to enjoy it. What happens up stream affects usage down stream. It then enters the Mississippi River and sends it to the gulf. Soil, silt, sand, manure, grass clippings, toys, wood, etc all from the five branches.

Catfish Creek Watershed and all other watersheds need to be cleaned up for us now an for the future generations.

Thank you and hope to see results

Wayne Buchholtz

Iowa DNR Response:

There are 10 total stream segments, or assessment units, in the Catfish Creek watershed. They include: Granger Creek (<https://programs.iowadnr.gov/adbnet/Segments/127>), Monastery Creek (<https://programs.iowadnr.gov/adbnet/Segments/6645>), Catfish Creek (3 segments) (<https://programs.iowadnr.gov/adbnet/Segments/126>, <https://programs.iowadnr.gov/adbnet/Segments/125>, <https://programs.iowadnr.gov/adbnet/Segments/124>), Unnamed Tributary to Catfish Creek (<https://programs.iowadnr.gov/adbnet/Segments/6407>), South Fork Catfish Creek (<https://programs.iowadnr.gov/adbnet/Segments/130>), Middle Fork Catfish Creek (2 segments) (<https://programs.iowadnr.gov/adbnet/Segments/128> <https://programs.iowadnr.gov/adbnet/Segments/6487>), and North Fork Catfish Creek (<https://programs.iowadnr.gov/adbnet/Segments/6486>).

The Iowa DNR assesses the Catfish Creek watershed in the same manner as the rest of the state. All available data collected in a segment, during the specified time period, are used to assess the designated uses for that segment.

COMMENTS: Erwin Klass, PhD

Date Received: Dec 24, 2019, Letter

Comment:

December 20, 2019

Iowa Department of Natural Resources
Attn: Dan Kendall
502 East 9th Street Des Moines, IA 50319

RE: Draft 2018 List of Impaired Waters

Dear Mr. Kendall:

I offer the following comments on the draft 2018 list of the Section 303(d) impaired waters. My comments represent more than 12 years of experience monitoring the waters Squaw Creek in Story County Iowa.

I took graduate courses in Limnology and Aquatic Ecology as part of my doctoral program at Kansas University. I also received training in water quality monitoring as a member of the DNR's IOWATER team of volunteers.

Squaw Creek receives runoff within a HUC 10 watershed in Hamilton, Webster, Boone and Story counties. The watershed is mostly row-crop agriculture with a high number of confined animal feeding operations (CAFOs).

I sampled Squaw Creek monthly for 12 years. More than 90 percent of the monthly samples exceeded the standards of E. coli bacteria used to close swimming beaches in the state. Twice I reported extremely high levels of bacteria that led to the discovery of sanitary sewer line breaks in Ames.

Squaw Creek is not on the DNR's impaired list of streams simply because the DNR does not include it in their randomized list of sample sites. This suggests that the number of impaired streams is grossly underestimated by

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the DNR. Similarly, Indian Creek which receives surface water runoffs from a large proportion of Story County has not been monitored at all, until recently.

I urge you to seriously consider the comments from the Iowa Environmental Council, an alliance of 75 organizations, at-large board members from business, farming, the sciences and education, and over 500 individual members.

Sincerely yours,



Erwin E. Klaas, PhD

2200 Hamilton Drive, Unit 508

Ames, Iowa 50014

Iowa DNR Response:

The Iowa DNR thanks you for comments on Squaw Creek ([IA 03-SSK-954](#)) and Indian Creek ([IA 03-SSK-947](#)) and the urging to consider Iowa Environmental Council's (IEC) comments. The Iowa DNR has reviewed the data supplied by Prairie Rivers and agrees with the recommendation to add the segments, Squaw Creek (03-SSK-954) and Indian Creek (03-SSK-947), to the Waters in Need of Further Investigation (WINOFI) list for E. coli. Because the data were collected and processed by a state certified laboratory, but without the other required quality controls in place, the potential impairment will be listed as "evaluated" instead of "monitored" on the state's WINOFI list because it does not meet the state's credible data law. Adding these water bodies to the WINOFI list will allow the Iowa DNR to target new locations for sampling in the future as additional funding becomes available to expand the currently robust ambient stream monitoring program. Additionally, a review and response to IEC's comments can be found in this document.

COMMENTER 6: Sandy Stanley, President, Clean Air Muscatine

Date Received: Dec 27, 2019, e-mail

Comment:

comments on the draft 2018 list of the Section 303(d) impaired waters.

1 message

Joseph rabelhofer <jrabelho@machlink.com>
To: "daniel.kendall@dnr.iowa.gov" <daniel.kendall@dnr.iowa.gov>

Fri, Dec 27, 2019 at 10:28 AM

Clean Air Muscatine

PMB 126

2807 University Drive

Muscatine, Iowa 52761

Iowa Department of Natural Resources

Attention: Dan Kendall

daniel.kendall@dnr.iowa.gov

Water Quality Monitoring & Assessment Section

Wallace State Office Building

502 East 9th Street

Des Moines, IA 50319

Dear Mr. Kendall:

Clean Air Muscatine (CLAM) offers the following comments on the draft 2018 list of the Section 303(d) impaired waters. These comments represent the views of CLAM a grass roots environmental membership organization in Muscatine, Iowa. CLAM has learned from the IDNR website and Iowa Environmental Council (IEC) the following:

The list of the 767 waterbodies tested by IDNR staff for the 2018 report reveals that more than half (54%) are impaired for a variety of reasons such as bacteria, turbidity (soil in the water), pH, and algae. Of the 43 new segments that were assessed for the 2018 list, 34 (or 79%) were listed as impaired.

A high proportion of state public beaches are on impaired waters. Of Iowa's state public beaches, 90% (35 of 39) are on waters that are impaired for recreational use. Public lands and waters are owned by the people under the care of the state. The state has done an inadequate job of protecting public lands and waters for public use.

DNR has not addressed the microcystin criterion recommended by EPA. The EPA has issued a recommendation for a microcystin water quality standard that would protect recreational users. The DNR has not addressed or adopted the criterion. To identify waters impaired for microcystin, DNR should take steps to address the cause of the impairments by writing and enacting TMDLs, and to protect the health and safety of Iowans. For the safety of Iowa, we urge DNR to adopt the EPA recommended criterion for microcystin.

What is most disturbing about this list is the high number of waterbodies and public beaches on the list and the failure to implement strategies to greatly reduce the pollutants in our waterways.

CLAM agrees with the IEC's assessment that "adopting numeric nutrient criteria would resolve many of the issues outlined above. The lack of clear standards has created uncertainty and low confidence in the completeness and accuracy of the assessments. Iowans deserve numeric standards, as most other states in the Midwest have adopted to protect citizens' health and quality of life. We urge the Environmental Protection Commission to begin rulemaking on numeric nutrient criteria for Iowa."

Thank you for allowing us to comment on this important topic.

Sincerely,

Sandy Stanley

President

Clean Air Muscatine

Iowa DNR Response:

In March of 2019, the US EPA issued recommendations for recreational water quality criteria and swimming advisories for cyanotoxins, which included magnitudes (i.e., cyanotoxin concentrations) along with guidance for selecting frequency and duration for the criteria. The Iowa DNR, along with other state agencies, submitted comments during the public comment period for this document. The finalized recommended criteria, issued in May of 2019, allows for adoption as state criteria and/or as swimming advisory thresholds, but states are not mandated to adopt the recommended criteria in either capacity. The Iowa DNR is currently reviewing the recommended criteria to decide on further future action on the subject.

The Iowa DNR continues to collect and analyze lake nutrient data as part of the ambient lake monitoring and the lake restoration programs. The development of quantitative indicators of lake health, including nutrient status, remains a high priority within these programs. Iowa, along with the states of Utah, Connecticut, and Oklahoma, continue to partner with EPA to provide data for and to test new nutrient models that were developed using national datasets. After expressing interest in participating, Iowa was selected as one of the case studies given the extensive datasets available for Iowa Lakes and the commitment in the Iowa Nutrient Reduction Strategy for the continued assessment and development of suitable nutrient criteria as a long-term goal.

Progress to date includes using national and Iowa data to estimate chlorophyll-a and microcystin relationships. Preliminary results have shown that combining state and national data can improve the performance of these new models. The documentation and review of the underlying science is now completed and the research behind this effort, titled "Combining national and state data improves predictions of microcystin concentration," was published in 2019 (Yuan et. al., 2019). EPA is expecting to release the draft lake numeric nutrient criteria in early 2020 that incorporates this research in addition to other pending research publications.

Reference

Lester L. Yuan, Amina I. Pollard. (2019). Combining national and state data improves predictions of microcystin concentration. Elsevier, Harmful Algae 84(2019), 75-83.

COMMENTS 7: Benjamin J. Maas, Assistant Professor, Buena Vista University; Raccoon River Watershed Association Board Member

Date Received: Dec 27, 2019, e-mail

Comment:

Comments Drafr 2018 Impaired waters list

1 message

Ben Maas <maas2@bvu.edu>

Fri, Dec 27, 2019 at 11:07 AM

To: "daniel.kendall@dnr.iowa.gov" <daniel.kendall@dnr.iowa.gov>

Good Morning,

Attached are my comments for the Draft 2018 Impaired Waters List. Thank you for this opportunity to comment on the 2018 Impaired Waters List.

Ben


Benjamin J. Maas, Ph.D.

Assistant Professor | Environmental Science and Geology

712.749.2279 | 610 West 4th St., Storm Lake, Iowa 50588

bvu.edu



 Comments DNR impaired waters.pdf
170K

December 24, 2019

Iowa Department of Natural Resources
Attn: Dan Kendall
502 East 9th Street
Des Moines, IA 50319

RE: Draft 2018 List of Impaired Waters

I am writing to offer the following comments on the draft 2018 Impaired Waters List for the state of Iowa. These comments not only represent me, but are also shared by the Raccoon River Watershed Association board members. Our comments can be classified into two categories, specific to the Storm Lake area and the Raccoon River, and general comments regarding the data used.

Our specific comments are in regard to Storm Lake and the surrounding waters. While Storm Lake did have elevated turbidity levels due to sediment resuspension, sediment sourced from area agricultural lands, initiatives by the City of Storm Lake to improve stormwater management and quality since 2015, as well as the spread of the invasive zebra mussels (*Dreissena polymorpha*) have resulted in marked reductions in turbidity. However, because the data range is 2012 – 2016, these recent improvements in turbidity have not been included in the draft list.

The Storm Lake beach monitoring data are only from the years 2014 – 2016, which omit data between 2016 – 2018 and likely no longer represent current conditions. These data also do not include any information on the more stringent assessment methods to assess microcystin that the EPA has recommended. These updated water quality standards would likely better inform recreational users. As indicator bacteria and biological impairments accounted for 574 impairments in Iowa's rivers and stream segments and 35 impairments in lakes, having the updated water quality standards seems prudent. Alternatively, Poor Farm Creek, which flows north out of Storm Lake, was listed in 2006 for a fish kill that resulted from a fuel spill, but this location has not yet been removed, despite the fact that this spill likely has been remediated.

A bit farther away from Storm Lake, some stream and river segments are not listed as impaired despite segments upstream and downstream being listed. In example, the North Raccoon River is listed as being impaired, category 5, for a section north of Sac City, but not closer to the headwaters. South of Sac City a segment is not listed and then between Sac City and Jefferson City, two segments are listed as impaired, category 4. These segments that are not listed are a bit curious as elevated nutrient concentrations is one criteria used to list a stream and river segment as impaired¹. Recent and continuous water quality data from the Iowa Institute of Hydraulics Research² (IIHR) elevated concentrations of nutrients along the North Raccoon River. Data from IIHR also indicates elevated nutrients concentrations along other segments.

As for our more general comments, there are 48% of the river and stream segments and 35% of lakes and reservoir segments that were either not assessed or the data were not included in the draft 2018 Impaired Waters List. These locations include ones that are used by Iowans for recreation and are critical for Iowa's tourism industry. Therefore, these locations either not assessed or not included in the draft 2018 Impaired Waters List need to be assessed or included in future reports at a greater percentage than they currently are. Other organizations, such as research labs (notably IIHR and the Iowa Limnology Lab at Iowa State University), the

discontinued IOWATER program, and current citizen science initiatives, provide important data that can help fill in current knowledge gaps.

As pointed out by the Iowa Environmental Council and indicated on the EPA's website³, the final 2018 list was supposed to have been submitted April 1, 2018. Additionally, the 2018 draft uses outdated data, from the years 2012 – 2016, to make its recommendations for listing or delisting and does not utilize more recent data. Examples of more recent data that could have been included are data collected by IIHR's state-wide stream monitoring network² as well as from Iowa Limnology Lab at Iowa State University⁶. These more recent data would better reflect changes in Iowa's water quality. Since 2012, Iowa has experienced an increase in the number of drainage tiles in fields, an increase in nitrogen and phosphorus loads in Iowa streams, and in chicken and hog populations^{4,5}. Data from the last three years, especially the IIHR river monitoring data, that might show the impact of these increases is not included in the draft report.

As for the 27 segments being delisted from the 2016 impaired waters list, because more recent data are not included in the 2018 draft it seems a little hasty to remove some of the locations in question. This is especially true for locations listed due to bacteria, algae, or other biological issues. Six sites are being removed from the list due to an "assessment error" as a result of changes in DNR methodology or insufficient frequency of data collection (i.e. Ballard Creek), despite the fact that more frequent sampling might warrant these locations to potentially still be listed as impaired.

Thank you for the opportunity to comment on the important topic of Iowa's water quality and on the draft 2018 Impaired Waters List. If you have any comments or questions on these comments, please feel free to contact me.

Sincerely,



Benjamin J. Maas, Ph.D.
Assistant Professor | Environmental Science and Geology
712.749.2279 | 610 West 4th St., Storm Lake, Iowa 50588
bv.u.edu



Supporting information:

1. Impaired Waters and TMDLs: Integrated Reporting Guidance under CWA Sections 303(3), 305(b) and 314, <https://www.epa.gov/tmdl/integrated-reporting-guidance-under-cwa-sections-303d-305b-and-314>
2. Iowa Water Quality: Information System <https://iwqis.iowawis.org/>
3. https://www.epa.gov/sites/production/files/2018-01/documents/final_2018_ir_memo.pdf
4. The Science of Improving Iowa's Water Quality, Jones, C., IIHR research Engineer, Water Quality Monitoring & Research, <https://www.iihr.uiowa.edu/cjones/scientific-insights-into-improving-water-quality-in-iowa/>
5. United States Department of Agriculture National Agricultural Statistics Service Quick Stats, <https://quickstats.nass.usda.gov/>
6. Iowa Limnology Lab, <https://iowalimnology.weebly.com/>

Iowa DNR Response:

Based on IR methodology, the impaired waters list will always be based on historical data and not the most current data. This is due to an acknowledgement that it takes time to analyze data by both internal and external agencies and ensure proper quality control and quality assurance to support listing decisions. The most up-to-date information on state waterbodies that the Iowa DNR currently samples can be found on the state water quality database AQUIA (<https://programs.iowadnr.gov/aquia/>).

In March of 2019, the US EPA issued recommendations for recreational water quality criteria and swimming advisories for cyanotoxins, which included magnitudes (i.e., cyanotoxin concentrations) along

with guidance for selecting frequency and duration for the criteria. The Iowa DNR, along with other state agencies, submitted comments during the public comment period for this document. The finalized recommended criteria, issued in May of 2019, allows for adoption as state criteria and/or as swimming advisory thresholds, but states are not mandated to adopt the recommended criteria in either capacity. The Iowa DNR is currently reviewing the recommended criteria to decide on further future action on the subject.

With respect to the Poor Farm Creek fish kill, based on current Iowa DNR IR methodology, historic anthropogenically caused fish kills, with no fines or restitution collected, remain on the list until new data are collected and show recovery of fish community. This segment will be added to the fish kill follow-up segment list for future sampling.

With respect to the comment “some stream and river segments are not listed as impaired despite segments upstream and downstream being listed”, with few exceptions, Iowa DNR only assesses designated uses/segments where water quality data have been collected. The specific details for the North Raccoon River segments above Sac City are as follows:

The segment of the North Raccoon River located directly above Sac City ([IA 04-RAC-1139](#)) is currently impaired for Aquatic Life Use (Category 5b-t) based on biological sampling. The most recent sample (2015) indicated that both the fish and benthic macroinvertebrate communities are not impaired. However, Iowa DNR IR methodology requires a “monitored” assessment to remove an impairment (two or more samples collected in multiple years in a recent five year period). North Raccoon River segment 1139 is also impaired for Class A1, Primary Contact Recreation but an EPA accepted TMDL covers that impairment and that designated use is housed in Category 4a (Pollutant-caused impairment. TMDL has been completed). The next upstream segment of the North Raccoon River ([IA 04-RAC-1140](#)) was assessed based on a 2013 fishkill (unknown cause and source) and 1994 stream use designation biological sampling data. Based on Iowa DNR IR methodology, both data sources indicated a potential impairment of the Aquatic Life designated use (Category 3b - Use potentially impaired based on an evaluated assessment). The Iowa DNR assessed the North Raccoon River in the same manner as the rest of the state. All available data collected in a segment, during the specified time period, were used to assess the designated uses for that segment.

The Iowa DNR has a contract with Iowa State University to collect data for various monitoring programs and these data are being used for assessment purposes. Other agencies would need to meet Credible Data Law requirements to be considered for assessments.

By methodology, the 2018 cycle is required to use credible data collected between 2014-2016 for rivers and 2012-2016 for lakes. The 2020 cycle will include more recent data, specifically river data collected between 2016-2018, and lake data from 2014-2018.

Based on Iowa DNR IR methodology, a segment must support its designated use(s) for two consecutive cycles to be delisted. The segments mentioned will have met this requirement for both the 2016 and 2018 cycles; therefore they were delisted.

The Iowa DNR interprets the due dates issued in the memorandum containing information concerning the submittal of the 2018 Clean Water Act Sections 303(d), 305(b), and 314 Integrated Reporting and Listing Decisions, released by the US EPA on December 22, 2017, to be a recommendation. The memo states that “The EPA and states should continue to make best efforts to provide on-time IR submittals

(all 56 states and Territories by April 1, 2018), with EPA action on the states' CWA Section 303(d) lists within 30 days of their submission" (https://www.epa.gov/sites/production/files/2018-01/documents/final_2018_ir_memo.pdf).

Additionally, the memorandum states that "This memo is not a regulation and does not impose legally binding requirements on EPA or the states." With the current staffing resources and a desire to include all available data for the current assessment cycle, the Iowa DNR applied best efforts to provide the 2018 as early as possible. The Iowa DNR Integrated Report staff are continuing to improve processes in order to complete and submit the IR by the EPA suggested submittal date.

Also, based on Iowa DNR IR methodology, Ballard Creek was listed inappropriately as "Not Supporting" for the 2016 cycle, when it should have been placed on the WINOFI list. This oversight was corrected for the 2018 cycle; therefore, the "Assessment Error " rationale was used for the delisting of the impairment.

COMMENTER 8: Andrew Fisher, private citizen

Date Received: Dec 28, 2019, e-mail

Comment:

Comments on Impaired Waterways Draft 2018 list

1 message

Andrew J Fisher <fishskier@gmail.com>
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 27, 2019 at 9:45 AM

Mr. Kendall,

The current plight of Iowa's waterways is embarrassing. We need to declare a state-wide emergency and take action accordingly. My comments reflect those of the Iowa Environmental Council below:

A high proportion of assessed waters are impaired. Despite the DNR's insistence that the number of impaired waters only increased 2% from the 2016 to 2018 lists, the proportion of assessed waters listed as impaired remains steady at 54%. Waters are not being removed from the list at a reasonable rate, nor has there been a serious effort on behalf of the state to write TMDLs, enact them, and improve the waters enough for them to be considered for removal. Instead, the DNR expects Iowans to accept that more than half the waters of the state are impaired for one or more of their designated uses. This indicates that the state does not take seriously its duty to protect water quality for Iowans. **We call on the state to take stronger leadership to improve Iowa's water quality and reduce the number of impairments to a manageable level.**

A high proportion of state public beaches are on impaired waters. Of Iowa's state public beaches, 90% (35 of 39) are on waters that are impaired for recreational use. Public lands and waters are owned by the people under the care of the state. **The state has done an inadequate job of protecting public lands and waters for public use.**

DNR has not addressed the microcystin criterion recommended by EPA.

The EPA has issued a recommendation for a microcystin water quality standard that would protect recreational users. The DNR has not addressed or adopted the criterion. To identify waters impaired for microcystin, DNR should take steps to address the cause of the impairments by writing and enacting TMDLs, and to protect the health and safety of Iowans, IEC urges DNR to adopt the EPA recommended criterion for microcystin.

Delay in release of the draft list means that Iowans are reviewing out-of-date data and impairments. By law, the final 2018 list was required to be submitted to EPA by April 1, 2018. The draft list was released more than nineteen months later on November 14, 2019. By law, the 2020 list must be submitted to EPA in less than four months on April 1, 2020, and a draft list has not been released for comment. The 2018 draft list uses data from 2012-2016 to assess new impairments or remove impairments. The DNR methodology claims data more than five years old are too old to be valid for this round of listing because they may no longer reflect the conditions of the waters. However, DNR's delay in developing the impaired waters list means the list does not consider the three most recent years of monitoring data. Iowans reviewing the draft 2018 list are looking at data from three or more years ago. Therefore, Iowans are not able to confidently use the 303(d) list to assess the safety or potential health risks associated with their local waterways. For example, the City of Greenfield experienced a bottled water advisory in the summer of 2018 due to cyanobacteria contamination of its source water, Lake Greenfield. In the 2018 assessment, Lake Greenfield remains unassessed for Class C Drinking Water use. Greenfield residents cannot look at the 2018 assessment and expect reliable information about their drinking water source. They also cannot expect that DNR will write a TMDL to help improve their drinking water source anytime in the near future. DNR is not meeting its legal obligation to submit the 303(d) list by the statutory deadline, leaving Iowans in the dark about the status of their waters and putting them at risk.

I would like to enjoy fun activities on the water like kayaking, swimming and letting my dog swim, but I cannot do that in many of our waterways. I know our state can do better. We must do better for our own future and our children's future.

Thanks,

Andrew Fisher
Ankeny, IA
515-460-3110

Iowa DNR Response:

In March of 2019, the US EPA issued recommendations for recreational water quality criteria and swimming advisories for cyanotoxins, which included magnitudes (i.e., cyanotoxin concentrations) along with guidance for selecting frequency and duration for the criteria. The Iowa DNR, along with other state agencies, submitted comments during the public comment period for this document. The finalized recommended criteria, issued in May of 2019, allows for adoption as state criteria and/or as swimming

advisory thresholds, but states are not mandated to adopt the recommended criteria in either capacity. The Iowa DNR is currently reviewing the recommended criteria to decide on further future action on the subject.

The Iowa DNR interprets the due dates issued in the memorandum containing information concerning the submittal of the 2018 Clean Water Act Sections 303(d), 305(b), and 314 Integrated Reporting and Listing Decisions, released by the US EPA on December 22, 2017, to be a recommendation. The memo states that “The EPA and states should continue to make best efforts to provide on-time IR submittals (all 56 states and Territories by April 1, 2018), with EPA action on the states’ CWA Section 303(d) lists within 30 days of their submission” (https://www.epa.gov/sites/production/files/2018-01/documents/final_2018_ir_memo.pdf). Additionally, the memorandum states that “This memo is not a regulation and does not impose legally binding requirements on EPA or the states.” With the current staffing resources and a desire to include all available data for the current assessment cycle, the Iowa DNR applied best efforts to provide the 2018 as early as possible. The Iowa DNR Integrated Report staff are continuing to improve processes in order to complete and submit the IR by the EPA suggested submittal date.

Based on methodology, the Impaired Waters list will always be based on historical data and not the most current data. This is due to an acknowledgement that it takes time to analyze data by both internal and external agencies and ensure proper quality control and quality assurance to support listing decisions. The most up-to-date information on state waterbodies that the Iowa DNR currently samples can be found on the state water quality database AQUIA (<https://programs.iowadnr.gov/aquia/>).

With respect to the general comment about the City of Greenfield drinking water bottled water advisory due to a possible cyanobacteria contamination of the water source, an understanding of cyanobacteria and the timeline for obtaining results of water testing (which ultimately showed that no cyanotoxins were present) are important to contextualize the bottled water advisory. Cyanobacteria, which are often referred to as blue-green algae, are microscopic organisms that are naturally present in all aquatic ecosystems, ranging from hypersaline to freshwater environments, and are important components of food webs and the nitrogen cycle. Cyanobacteria can form blooms that sometimes produce cyanotoxins. City of Greenfield issued a bottled water advisory in response to turbidity above the drinking water standards at the water plant and the presence of a possible cyanobacteria (blue-green algae) bloom at Greenfield Lake. Turbidity measures cloudiness, which indicates if the system is effectively filtering the water supply. Normally, turbidity issues would trigger a boil water advisory due to possible bacteria in the system. However, in an overabundance of caution, the Iowa DNR along with City of Greenfield issued a bottled water advisory due to the possibility of cyanotoxins in the source water (with cyanobacteria present) and the fact that it would take time to get results back from the laboratory testing for cyanotoxins. Results from laboratory testing ultimately showed that there were no cyanotoxins present in the samples taken on the day of the event. Related to the assessment of Greenfield Lake, the Class C drinking water use remains unassessed due to a lack of additional information. The only parameter collected as part of the ISU lake surveys relevant to support of Class C (drinking water) uses is nitrate. While the results of the ISU surveys from 2012-2016 show that nitrate levels are extremely low in this lake (maximum value = 1.2 mg/l; median = 0 mg/l), the Iowa DNR does not find these data sufficient for developing a valid assessment showing “full support” of the Class C uses.

COMMENTER 9: Jennifer Wilson, private citizen

Date Received: Dec 28, 2019, e-mail

Comment:

A plea from a mom about Iowa water

1 message

Jennifer Wilson <writerjenwilson@gmail.com>
To: daniel.kendall@dnr.iowa.gov

Sat, Dec 28, 2019 at 2:58 PM

Dear Mr. Kendall,

Thank you for the opportunity for public comment about the quality of Iowa's impaired waters. As a writer for the DNR for many years, an author, a mother, and an outdoors woman, I would like to add my thoughts and plea for consideration.

I grew up wandering the banks of the South Skunk River, now listed as impaired but not receiving support from the DNR's efforts. All the families in my small town used it for recreation and delight. The river made hard times, such as the closing of the Maytag plant, better, more bearable, and more than one generation of my family relied on that river for food in coal mining days. Now people steer clear of the Skunk—rumor has it your dog will die if it jumps in there, and nobody wants to fish without a dog by their side—and the soul of my county seems to wilt because of this. Recreation is in town, for driving around, and the benefit of growing up rural, understanding the patterns of the land and water and living by them, has faded. It just adds one more aspect of abandonment in smaller towns in Iowa, but we could do something about this one.

With better regulation and enforcing clean farming practices we could do better. We could open our beaches to those of us who deeply miss wandering and fishing along the beachfront at Saylorville or Big Creek throughout the year, prevented from doing so because the muck and yuck gets so thick, so fast, particularly on Big Creek. The last time I took the kids and our neighbors' kids to Lake Ahquabi, there was so much algae I was worried to even let them drop a line. We played around on the docks and went home.

The EPA's updated microcystin recommendation has been updated; Iowa's standards should reflect that. Stewardship of the land and water runs deeper than farm roots in Iowa, and it's what will last during the inevitable turn toward clean energy, sustainable farming demands, and our deep need to keep our kids here, so they can do better than we've done, and build a legacy that celebrates our environmental heritage, rather than robbing it from the future residents of Iowa.

I would like for my taxpayer dollar to see higher standards of excellence funded and enforced by the DNR, addressing immediately the impairments that haven't been resolved over the course of many years, and releasing reports like this both on time, and more frequently. This is simply the only decent way of treating this place that's given us so much; we've taken more than our fair share from it, and we need to make that right.

I am one of many hard-working people who have made commitments to stay in Iowa, to spend our money here and talk to our kids about why it matters to stay, too. Wise economists understand that the spending and commitment of everyday people to a place keep it vital. But again and again, the state shows us that it doesn't love us back. That the wild places that sustain us all—the land, the water in particular—hold less value than the short-term gains of profit for few. Iowa is becoming an ugly place to live, and don't think it's easy for me to write that. I'm an apologist for the state wherever I go, and I travel far and wide for work and for my writing vocation.

Perhaps you feel I'm being dramatic. I don't disagree. But to give you an idea why the issue of Iowa water is so incredibly vital to the long-range vision of Iowa, I am attaching a photo from the hike I took my children on just last week at Yellow Banks in Runnells. I'd pled and wheedled to get them to hike with me, promising the restoration that nature brings, as opposed to the insular nature of the screens they're on so often during holiday breaks. When we arrived at Yellow Banks, the dogs and kids bounded from the car, and went straight to the river to throw rocks and play, which they've loved since I started taking them to the woods. But we had to immediately turn back and steer clear of that water, as the shore was lined as far as we could see with the rotting bodies of dead fish, and the partially decomposed skeleton of a poisoned deer.

The conversation on the way home was far different than the one on the way to the woods.

It was difficult for me to plea why going to wilderness remains important, though our state and our businesses do not seem to be making sensible conservation a regulated priority. I encouraged them to keep trying with me, but instead of restoring our spirits that day, Iowa (not the land, not the water, but the ones in charge of safeguarding these things) had let us down. I wonder how many families had that same experience during this break. The park was very empty, despite the lovely weather.

Thank you for reading. I appreciate this opportunity deeply. Please let me know if you have any questions, or would like further comments.

Jennifer Wilson
518 Waterbury Cir
Des Moines, Iowa, 50312



Iowa DNR Response:

The Iowa DNR forwarded the photo and information regarding the dead fish to the appropriate Field Office. The Field Office reported that multiple fish kill reports were received by their office on December 13, 2019. As a result, Iowa DNR field staff investigated; no contaminants were observed in the water. Iowa DNR Fisheries staff confirmed that the cause of the dead fish was a natural occurrence. A press release was issued to let the public know, which can be viewed [here](https://www.iowadnr.gov/test/About-DNR/DNR-News-Releases/ArticleID/2777/DNR-checks-on-dead-fish-in-Des-Moines-River) (<https://www.iowadnr.gov/test/About-DNR/DNR-News-Releases/ArticleID/2777/DNR-checks-on-dead-fish-in-Des-Moines-River>).

In March of 2019, the US EPA issued recommendations for recreational water quality criteria and swimming advisories for cyanotoxins, which included magnitudes (i.e., cyanotoxin concentrations) along with guidance for selecting frequency and duration for the criteria. The Iowa DNR, along with other state

agencies, submitted comments during the public comment period for this document. The finalized recommended criteria, issued in May of 2019, allows for adoption as state criteria and/or as swimming advisory thresholds, but states are not mandated to adopt the recommended criteria in either capacity. The Iowa DNR is currently reviewing the recommended criteria to decide on further future action on the subject.

Responses And Actions To Comments Received On General Water Quality Comments:

The Iowa DNR received the following emails on general water quality during the public comment period. While these emails are not directly applicable to Iowa's 2018 Impaired Waters List, these emails were forwarded on to more appropriate contacts within the Iowa DNR

COMMENTS 10: Mark Kane, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Iowa's filthy waters
1 message

Mark Kane <info@email.actionnetwork.org> Fri, Dec 20, 2019 at 12:13 PM
Reply-To: markkane0323@gmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

Do what I pay you to do. Monitor the water quality of streams, creeks, rivers, lakes and ponds and post the results online in a format that most people can understand, graph form, bar chart, numbers pinned to statewide locations.

Mark Kane
markkane0323@gmail.com
667 44th Street
Des Moines, Iowa 50312

Iowa DNR Response:

The Iowa DNR has robust ambient river/stream, lake, and wetland monitoring programs. Data collected by these programs are updated regularly into the States online water quality database AQuIA (<https://programs.iowadnr.gov/aquia>). The AQuIA database contains sampling results, annual summaries, and charts for each sampling site.

COMMENTS 11: John Norwood, Polk County Soil and Water Commissioner

Date Received: Dec 21, 2019, e-mail

Comment:

Re: Public Comment, 2018 Iowa Impaired Waters Comments, John M. Norwood, Polk County, Soil & Water Commissioner [Revised]

1 message

John Norwood <john@tblventures.com>
To: daniel.kendall@dnr.iowa.gov
Cc: gronstal@iaenvironment.org

Sat, Dec 21, 2019 at 10:34 AM

Waters Comments, John M. Norwood, Polk County, Soil & Water Commissioner

Dear Mr. Kendall:

My name is John Norwood, and I am a resident of West Des Moines, Iowa, as well as one of five Polk County Soil and Water Commissioners, representing the voters of Polk County on water quality and soil health issues.

I have four (4) suggestions for tackling Iowa's Impaired Waters, which stem, primarily from our tremendously productive, but also huge agricultural footprint: 23 million acres of corn and bean ground, 50 million hogs produced annually, and 12 million acres of that corn and bean ground tilled, about half of which is controlled by our state chartered 3,700 drainage districts which were envisioned as part of our state's constitution.

1. My first suggestion is the State would greatly benefit all Iowans if we were to adopt a systems vision and approach to tackling our Impaired Waters within the Agricultural system in which we operate. This requires a drainage district level modernization effort, prioritizing, first, the modernization of those drainage districts which are the biggest contributors of nitrogen, phosphorus and other micropollutants and toxins that threaten both human health and animal health. The current farm-by-farm approach as outlined by the Iowa Nutrient Reduction strategy is not working. In fact, I would argue the so called Nutrient Reduction Strategy is not a strategy, rather it is simply a menu of options, many of which are economically, technically or politically infeasible. Biofilters being an example. There is no conceivable way we will ever get 170,000 of those installed and keep them functioning with an average operating lifespan of ten years.

Instead of this piece meal, haphazard approach that is lacking in economic and technical feasibility, we need to recognize the importance of scale and scope economics in building the kind of long lasting (100+ year), durable infrastructure like breakpoint and tile zone wetlands that can filter water, assist in aquifer recharge, flood control irrigation, and provide much needed wildlife and pollinator habitat. We are building these one-by-one, here and there, instead of utilizing a drainage system-by-drainage system approach, which is a mistake both from a hydraulic systems perspective as well as a cost perspective and an "opportunity cost" perspective. We waste private and public resources when we pursue suboptimal solutions.

Like conventional wastewater, storm water and drinking water systems, we should be conducting hydraulic modeling at the drainage systems level, and then identifying the "solution set" for each system which may require new financial approaches to help incentivize and install this infrastructure. The original function of these systems was drainage and today we need them to serve multiple functions. I'd start by finding a few forward thinking County Boards of Supervisors and drainage district landowners in priority watersheds who are forward thinking and see these improvements as "market differentiators" for those food companies who are interested in supporting regenerative agriculture. Part of our construction approach should be to improve these systems in "phases" which bundle construction activities to save on design and construction costs. Over the past 15 years we've installed 90 of so called CREP style wetlands. We have more than 1,400 potential sites identified statewide. To date, we are building about 6-8 per year even with the new state 512 monies. We should be building more like 100 per year and over time we'd have close to 4.5 million acres of tiled ground filtered by this system of infrastructure. We have a waiting list for these sites, and yet we have insufficient funds, and stage agencies that are not set up to handle the increased throughput we need to accomplish this work. I'd suggest we need to look at how we maintain and build our state network of county and state roads using public-private partnerships as a model for how we could begin to build the capacity to improve our green drainage infrastructure.

2. My second suggestion is to create a state and matching federal green, conservation infrastructure fund(s) that are dedicated to helping those drainage districts who would like to modernize with making those improvements on a systems level, provided they meet certain design standards and improvements. We may need to come up with some of those as we learn how to best do the modernization work. One benefit would be that these modernization efforts may begin to help farmers differentiate how they are growing corn and beans and other crops that may be of interest to food companies that are increasingly interested in regenerative farming practices. Given the enormous private investment to date in our 3,700 drainage districts, I don't think it is unreasonable to believe that we will need to spend on the order of \$50-\$200 million annually for a period of at least 20 years across the state (we spend billion on roads and we've spent billions over a century building these drainage systems), but perhaps with most focus on those drainage districts in the 15 or so counties on the Des Moines lobe and upstream of the state's most populous water supply. As far as the Federal Government, I see a similar funding role for how it helped coastal cities modernize their wastewater treatment plans back in the 1970s and 1980s (in some cases the federal government provided 90% cost share). We need a pot of money to help our drainage districts do what was done for coastal systems. I'd also suggest if the Federal Government can find \$16 billion in emergency farm payments to address essentially the overproduction of corn and soybeans, we need to rethink how we use subsidies to promote sustainable farming practices vs. one time relief payments. We should be able to come up with another \$50-\$200 million per year of Federal monies to help drainage districts modernize, including the conversion of 500,000 or so agricultural acres to produce environmental services instead of crops. The CREP program provides a series of payments to producers which can help diversify the ups and downs of commodity cycles. Our green wetland infrastructure should be thought of as having similar functional importance to farm roads and we recognize, there, the need to take land out of production for machinery to get into the fields and transportation of farm inputs and outputs to market. The millions of dollars that we need to INVEST in diversifying the rural Iowa agricultural landscape is a HUGE opportunity (borrowing from our President's lexicon) to generate new jobs, new services, and new economic development opportunities, and community vitality. Imagine what we could do for the rural quality of life if we can take the stink out of manure with a systems approach to anaerobic digestion or aerobic digestion of the manure.
3. My third suggestion is to convene a panel of state health experts to identify the biggest threats in our impaired waters with a particular focus on human health and animal health here in Iowa. I recently listened to a University of Iowa health expert at a water quality workshop on threats to our drinking water system that had me very concerned. I think more Iowans would be concerned if they understood better what our science is beginning to tell us about long term chronic exposure to contaminants even at parts per million or billion. I believe nitrogen in our water is a symptom of a system that is out of balance, but it isn't nitrogen that we need to be most concerned with. It's the byproducts of nitrogen and phosphorus in our waters which produce toxic algae or microcysts, and it's other contaminants from manure runoff including pathogens and antibiotic resistant strains of bacteria that we should be focused on. Things that can lead to Pandemics. The World Health Institute has issued a number of warnings, for example, about the loss of front line antibiotics that are in part the result of overuse, and there is concern that our animal livestock industry is contributing to that loss of efficacy. We need advanced treatment technology across our public water supply systems, Reverse Osmosis (RO) systems for example which remove a wide spectrum of contaminants, since unlike most other major cities we don't have protected watersheds and in the case of Des Moines we receive our drinking water from one of the most intensively farmed regions of the world. Similarly, we need to have heightened focus on protecting our rural water supplies including private wells.

4. My final suggestion is that working with the Iowa Department of Agriculture and the US Department of Agriculture we need a systems wide approach to aligning state and federal policies that support re-diversification of our agriculture lands away from such a heavy focus on row crop agriculture, and financial incentives that encourage the over application of commercial fertilizers to protect "downside risk" and add additional focus on perennial systems that can help stabilize soils on highly erodible and steep sloped grounds. This would include modifying crop insurance policies to move away from quantity based production goals to new sustainability based goals and limiting crop insurance to certain types of ground which are suitable to row crops (not steep slopes or buffer areas). We also need a "team based" approach to cover crops so that each farmer doesn't have to "reinvent the wheel" in terms of learning how to do this, we can create teams of cover crop users to buy down the cost of inputs, and perhaps create new markets for cover crops or forage systems that tie landowners together in cooperative efforts. In my vision, payments would be made not just to individual farmers, but to teams of farmers that achieve pre-determined targeted objectives that are likely to be county-by-county based on the local geography. One such cooperative effort on the crop production side (Carson Baron farms sp?) is on-going up in Northeast Iowa as Market to Market featured last night in an episode. We need to apply that approach to conservation practices and new cropping systems, as a form of portfolio diversification, cost control and risk mitigation.

Our public servants are hard-working but we need to provide a new vision and new resources to how we address the opportunity and the challenge before us. Iowans deserve clean water. We can be a leader in teaching the world how to configure new agricultural systems that produce clean water and clean air. Thank you for the opportunity to comment.

John Norwood
Polk County, Soil and Water Commissioner
West Des Moines, IA
December 21, 2019

Iowa DNR Response:

This comment is specific to possible solutions to help improve water quality in the state of Iowa, not necessarily specific to this draft of the 2018 Impaired Waters list. This comment was forwarded to Adam Schnieders who serves as the Iowa DNR's Water Quality Resource Coordinator and agency coordinator for the Iowa Nutrient Reduction Strategy.

COMMENTS 12: Claire Celsi, Iowa State Senator

Date Received: Dec 27, 2019, e-mail

Comment:

Comments on Iowa's impaired water bodies

1 message

Celsi, Claire [LEGIS] <Claire.Celsi@legis.iowa.gov>
To: "Kendall, Daniel [DNR]" <daniel.kendall@dnr.iowa.gov>

Fri, Dec 27, 2019 at 11:09 AM

Dear Mr. Kendall:

I am dismayed about the continuing decline of Iowa's water quality. I believe it is the biggest negative about living in Iowa. We have allowed corporate agriculture to have its way with our land and water. Our unregulated and undisciplined farming practices are endangering our citizens' health and our future ability to count on clean water and fertile soil.

I am writing to urge the DNR to invest more into water testing, both in recreational bodies of water and in private wells. Please publish those results more often. I also urge you to advocate for mandatory buffers and no-till practices.

Thank you for your time,

Senator Claire Celsi

Iowa DNR Response:

The Iowa DNR thanks you for your comments. We forwarded your comments to the Iowa DNR's Water Quality Resource Coordinator for follow up.

COMMENTS 13: Diane Delozier Lahr, private citizen

Date Received: Dec 28, 2019, e-mail

Comment:

Waterways

1 message

Diane <delozierlahr@aol.com>
To: daniel.kendall@dnr.iowa.gov

Sat, Dec 28, 2019 at 8:56 AM

Mr. Kendall,

In regards to the impaired waters of Iowa, we are struggling with clean water, land and air levels. We are in a crisis! This last couple of summers, more and more recreational areas in Iowa have been closed due to e-coli and runoff from ag farms and CAFOS. This letter John Norwood sent to Mr. Kendall is spot on.

In Johnson County, we are seeing an increase in CAFOS being built. (Many buildings are owned by foreign countries who pay farmers for the use of their land). There are few regulations on how and where they may build the CAFOS. The Master Matrix must be revised with severe consequences. Neighbors have no way of knowing when their neighbors build one or more CAFOS.

I would like to see a more detailed chemical result of the major waters in Iowa.. what chemicals and pesticides levels are and where they are coming from. When we in Johnson County have DO NOT SWIM signs for Macbride Lake, this is scary and is a warning of how to protect our water, Land and air..... stricter and enforced laws.

Diane Delozier Lahr Iowa City, IA 319-430-7633

From John Norwood of Polk County Soil and Water Commissioner:

I have four (4) suggestions for tackling Iowa's Impaired Waters, which stem, primarily from our tremendously productive, but also huge agricultural footprint: 23 million acres of corn and bean ground, 50 million hogs produced annually, and 12 million acres of that corn and bean ground tilled, about half of which is controlled by our state chartered 3,700 drainage districts which were envisioned as part of our state's constitution.

My first suggestion is the state would greatly benefit all lowans if we were to adopt a systems vision and approach to tackling our impaired waters within the agricultural system in which we operate.

This requires a drainage district level modernization effort, prioritizing, first, the modernization of those drainage districts which are the biggest contributors of nitrogen, phosphorus and other micropollutants and toxins that threaten both human health and animal health. The current farm-by-farm approach as outlined by the Iowa Nutrient Reduction strategy is not working.

In fact, I would argue the so called Nutrient Reduction Strategy is not a strategy, rather it is simply a menu of options, many of which are economically, technically or politically infeasible. Biofilters being an example. There is no conceivable way we will ever get 170,000 of those installed and keep them functioning with an average operating lifespan of ten years.

Instead of this piecemeal, haphazard approach that is lacking in economic and technical feasibility, we need to recognize the importance of scale and scope economics in building the kind of long lasting (100+ years), durable infrastructure like breakpoint and tile zone wetlands that can filter water, assist in aquifer recharge, flood control irrigation, and provide much needed wildlife and pollinator habitat.

We are building these one-by-one, here and there, instead of utilizing a drainage system-by-drainage system approach, which is a mistake both from a hydraulic systems perspective as well as a cost perspective and an "opportunity cost" perspective. We waste private and public resources when we pursue suboptimal solutions.

Like conventional wastewater, storm water and drinking water systems, we should be conducting hydraulic modeling at the drainage systems level, and then identifying the "solution set" for each system which may require new financial approaches to help incentivize and install this infrastructure. The original function of these systems was drainage and today we need them to serve multiple functions.

I'd start by finding a few forward-thinking county Boards of Supervisors and drainage district landowners in priority watersheds who are forward-thinking and see these improvements as "market differentiators" for those food companies who are interested in supporting regenerative agriculture. Part of our construction approach should be to improve these systems in "phases" which bundle construction activities to save on design and construction costs.

Over the past 15 years we've installed 90 of so called CREP [Iowa Conservation Reserve Enhancement Program] style wetlands. We have more than 1,400 potential sites identified statewide. To date, we are building about 6-8 per year even with the new state 512 monies.

We should be building more like 100 per year and over time we'd have close to 4.5 million acres of tiled ground filtered by this system of infrastructure. We have a waiting list for these sites, and yet we have insufficient funds, and stage agencies that are not set up to handle the increased throughput we need to accomplish this work. I'd suggest we need to look at how we maintain and build our state network of county and state roads using public-private partnerships as a model for how we could begin to build the capacity to improve our green drainage infrastructure.

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We may need to come up with some of those as we learn how to best do the modernization work. One benefit would be that these modernization efforts may begin to help farmers differentiate how they are growing corn and beans and other crops that may be of interest to food companies that are increasingly interested in regenerative farming practices.

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As far as the federal government, I see a similar funding role for how it helped coastal cities modernize their wastewater treatment plans back in the 1970s and 1980s (in some cases the federal government provided 90% cost share). We need a pot of money to help our drainage districts do what was done for coastal systems.

I'd also suggest if the federal government can find \$16 billion in emergency farm payments to address essentially the overproduction of corn and soybeans, we need to rethink how we use subsidies to promote sustainable farming practices vs. one time relief payments.

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I recently listened to a University of Iowa health expert at a water quality workshop on threats to our drinking water system that had me very concerned. I think more Iowans would be concerned if they understood better what our science is beginning to tell us about long term chronic exposure to contaminants even at parts per million or billion.

I believe nitrogen in our water is a symptom of a system that is out of balance, but it isn't nitrogen that we need to be most concerned with. It's the byproducts of nitrogen and phosphorus in our waters which produce toxic algae or microcysts, and it's other contaminants from manure runoff including pathogens and antibiotic resistant strains of bacteria that we should be focused on. Things that can lead to pandemics.

The World Health Institute has issued a number of warnings, for example, about the loss of front line antibiotics that are in part the result of overuse, and there is concern that our animal livestock industry is contributing to that loss of efficacy. We need advanced treatment technology across our public water supply systems, Reverse Osmosis (RO) systems for example, which remove a wide spectrum of contaminants, since unlike most other major cities we don't have protected watersheds and in the case of Des Moines we receive our drinking water from one of the most intensively farmed regions of the world. Similarly, we need to have heightened focus on protecting our rural water supplies including private wells.

My final suggestion is that working with the Iowa Department of Agriculture and the US Department of Agriculture we need a systems wide approach to aligning state and federal policies that support re-diversification of our agriculture lands away from such a heavy focus on row crop agriculture, and financial incentives that encourage the over application of commercial fertilizers to protect “downside risk” and add additional focus on perennial systems that can help stabilize soils on highly erodible and steep sloped grounds.

This would include modifying crop insurance policies to move away from quantity based production goals to new sustainability based goals and limiting crop insurance to certain types of ground which are suitable to row crops (not steep slopes or buffer areas). We also need a “team based” approach to cover crops so that each farmer doesn’t have to “reinvent the wheel” in terms of learning how to do this, we can create teams of cover crop users to buy down the cost of inputs, and perhaps create new markets for cover crops or forage systems that tie landowners together in cooperative efforts.

In my vision, payments would be made not just to individual farmers, but to teams of farmers that achieve pre-determined targeted objectives that are likely to be county-by-county based on the local geography. One such cooperative effort on the crop production side (Carson Baron farms sp?) is on-going up in Northeast Iowa as Market to Market featured last night in an episode. We need to apply that approach to conservation practices and new cropping systems, as a form of portfolio diversification, cost control and risk mitigation.

Our public servants are hard-working but we need to provide a new vision and new resources to how we address the opportunity and the challenge before us. Iowans deserve clean water. We can be a leader in teaching the world how to configure new agricultural systems that produce clean water and clean air. Thank you for the opportunity to comment.

John Norwood
Polk County, Soil and Water Commissioner
West Des Moines, IA
December 21, 2019

Sent from my iPhone

Iowa DNR Response:

The most up-to-date information on state waterbodies that the Iowa DNR currently samples can be found on the state water quality database AQUIA (<https://programs.iowadnr.gov/aquia/>). While source tracking is typically cost prohibitive and not always feasible with the sampling techniques employed by many of our contract laboratories. The Iowa DNR has participated in and requested studies that identify the sources of surface water pollutants.

COMMENTER 14: Brenda Brink, private citizen

Date Received: Dec 28, 2019, e-mail

Comment:

Impaired waters in Iowa

1 message

Brenda Brink <info@email.actionnetwork.org>
Reply-To: brendarbrink@gmail.com
To: daniel.kendall@dnr.iowa.gov

Sat, Dec 28, 2019 at 2:32 PM

Dan Kendall,

This letter is to remind you and other Iowans that we deserve the beauty, access and right to unpolluted waterways in Iowa. I urge the DNR to get its priorities straight.

The trend of an ever-increasing number of impaired waters, the lack of recognition that there are sources for that pollution and the lack of adequate action to correct the problem all tell us that there will be a day of reckoning when not just fish will die from the toxins in our water. We must take corrective action now before any precious child or vulnerable adult succumbs.

The explosion of antibiotic resistance that renders our usual medicines useless stems from the factory farms that continue to populate Iowa. The evidence from the DNR is clear that the pollution is coming from the animal manure, laden with antibiotics, getting into our waters. How can we make sure the public has the tools to treat illness, when this ramping up of antibiotic-resistance microorganisms is being basically "farmed" in our state?

The microcystin threat in too many state and private waters, especially those segments that haven't been investigated yet, should be raising enough concern that we stop the dangerous trend of cutting staff at our state parks. We need rangers who can make sure that the public knows about the threat. I have myself had to point out the pertinent sign with the less-than-noticeable message about not swimming in a state park lake. Why put one sign up near the water when the whole beach should be closed, with warning signs at appropriate locations like parking areas, before the family drags all their swimming inflatables and gear down to the beach? It boils down to a lack of priority for public use that means staffing of recreational areas is not important. When there are public health concerns, there needs to be the staff to help monitor and assist the public with appropriate action, not just ignoring it.

For too long, Iowans have put up with the practice of desktop inspections of factory farms which gives zero public confidence that appropriate monitoring is being done around the state. With the proven increase in torrential rains, there is no substitute for boot-on-the-ground/mud inspections because the washing away of manure and other preventable hazards can be predicted only by periodic on-site inspections.

These are only a few of my concerns prompted by the terribly delayed impaired waters list but I, again, demand that our public comments be given the highest priority as we are the only real stakeholders when it comes to the waters of our state.

Brenda Brink
brendarbrink@gmail.com
29514 US HIGHWAY 69
HUXLEY, Iowa 50124

Iowa DNR Response:

The Iowa DNR thanks you for your comment. In March of 2019, the US EPA issued recommendations for recreational water quality criteria and swimming advisories for cyanotoxins, which included magnitudes (i.e., cyanotoxin concentrations) along with guidance for selecting frequency and duration for the criteria. The Iowa DNR, along with other state agencies, submitted comments during the public comment period for this document. The finalized recommended criteria, issued in May of 2019, allows for adoption as state criteria and/or as swimming advisory thresholds, but states are not mandated to adopt the recommended criteria in either capacity. The Iowa DNR is currently reviewing the recommended criteria to decide on further future action on the subject.

Additionally, all State monitored beaches are posted with Information Signs on indicator bacteria and blue-green algae toxins that provide general information regarding ways to reduce the potential health risk associated with swimming at public beaches. These signs also inform the public of current monitoring efforts and ways to obtain the data. Postings occur between Memorial Day and Labor Day (recreational monitoring season). The Iowa DNR State Park Beach Monitoring website (<https://www.iowadnr.gov/Environmental-Protection/Water-Quality/Water-Monitoring/Beaches>) is also maintained during this time period. Advisories are updated weekly during the recreational monitoring season.

Response To Emails Received About The Timing Of The Release Of The 2018 Impaired Waters List:

The Iowa DNR received the following emails about the timing of the release of the Impaired Waters list during the public comment period. The Iowa DNR interprets the due dates issued in the memorandum containing information concerning the submittal of the 2018 Clean Water Act Sections 303(d), 305(b), and 314 Integrated Reporting and Listing Decisions, released by the US EPA on December 22, 2017, to be a recommendation. The memo states that "The EPA and states should continue to make best efforts to provide on-time IR submittals (all 56 states and Territories by April 1, 2018), with EPA action on the states' CWA Section 303(d) lists within 30 days of their submission"

(https://www.epa.gov/sites/production/files/2018-01/documents/final_2018_ir_memo.pdf).

Additionally, the memorandum states that "This memo is not a regulation and does not impose legally binding requirements on EPA or the states." With the current staffing resources and a desire to include all available data for the current assessment cycle, the Iowa DNR applied best efforts to provide the 2018 IR as early as possible. The Iowa DNR Integrated Report staff are continuing to improve processes in order to complete and submit the IR by the EPA suggested submittal date.

COMMENTER 15: Jane Alderman, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Water
1 message

Jane Alderman <jalderman@mchsi.com> Wed, Dec 11, 2019 at 8:32 AM
Reply-To: jalderman@mchsi.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

I am so concerned about the condition of the water in our state. The # of impaired waterways continues to increase and so many waterways have not been tested so the # is likely much higher. Water is so critical for life that at a minimum I expect my government to do all it can to ensure I have safe water. Iowa is blessed with water and yet we are ruining it.

Also, why are my tax dollars not being used to follow the regulations of reporting the impaired waterways on time - not 19 months late? And why are not all waterways being tested so we have real facts to deal with? And why are true measures being taken to stop and reverse the # of impaired waterways?

I'm so concerned about all lowans health due. DNR officials, you MUST do your jobs and also lobby our legislatures to get serious about protecting water. This is a all hands on deck crisis.

Jane Alderman
jalderman@mchsi.com
605 SE 5th St
Ankeny, Iowa 50021

COMMENTER 16: Patrick Bosold, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

DNR's Impaired Waterways List, next steps

1 message

Patrick Bosold <bosolds@lisco.com>

Wed, Dec 11, 2019 at 10:28 AM

Reply-To: bosolds@lisco.com

To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

Dear Mr. Kendall,

The DNR's recently released (19 months late) Impaired Waterways List indicates that, of the over 1,400 segments from streams, rivers, lakes, and wetlands that the DNR investigated:

- Only 363 segments fully met Iowa's water quality standards
- 767 segments are impaired
- 523 segments are still in need of further investigation

The DNR has no timeline to finish the investigations that need to be done.

Are you aware of the fact that water quality advocates around the U.S. are referring to Iowa as "The World's Largest Open-Air Toilet" because of the deplorable state of our surface waters? As

someone who has been a trained IOWATER volunteer and done water quality sampling, I contend that this latest List simply confirms a major lack of water quality monitoring and enforcement in Iowa. We need to do better. Take the advice of advocates on this matter and make the remedies in the Iowa Nutrient Reduction Strategy mandatory, not voluntary, for starters. And make those responsible for the state of each and every water quality violation in Iowa financially liable for cleaning up the mess they've made, with complete cessation of any state or federal subsidies of any kind until they have done so.

Patrick Bosold

bosolds@lisco.com

202 N. 5th St.

Fairfield, Iowa 52556

COMMENTS 17: Garrett Hall, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Clean Water Report

1 message

Garrett Hall <info@email.actionnetwork.org>
Reply-To: hallgt@gmail.com
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 2:08 PM

Dan Kendall,

Hello,

Water is the essence of life on earth and without clean water WE all are at risk. It is extremely frustrating that this report is 19 months late and has not fulfilled the duty of assessing every water way in the state. I no longer can use rivers in the Des Moines area for recreation due to the high levels of pollution, algal growth, and general appearance/smell. As the state agency in charge of waterways, you should be focused on cleaning up these waterways, not delaying reports that are incomplete and show more harm has continued to take place.

Garrett Hall
hallgt@gmail.com
617 7th St
West Des Moines, Iowa 50265

COMMENTS 18: Liz Carlson, private citizen

Date Received: Dec 12, 2019, e-mail

Comment:

Clean Water For Christmas

1 message

Liz Carlson <info@email.actionnetwork.org>
Reply-To: eclairification@gmail.com
To: daniel.kendall@dnr.iowa.gov

Thu, Dec 12, 2019 at 12:31 PM

Dan Kendall,

To Mr. Kendall,

I am writing to implore the DNR to live up to its responsibility to maintain clean waterways for the citizens of Iowa. Clean drinking water is a basic human right, and the effects unsafe water can have on the health of whole communities are disastrous and must be avoided. The excessive length of time it took the DNR to release its assessment of Iowa waterways, and the lack of a plan to address issues found so far, is deeply frustrating - ensuring the safety of our water is one of the most basic and most important responsibilities of the DNR. This Christmas, please think of the health, safety, and happiness of every family in Iowa - you have the power to preserve them, or put them in serious danger.

Liz Carlson
eclairification@gmail.com
2000 Westown Parkway, #9
[West Des Moines, Iowa 50265](https://www.iowa.gov)

COMMENTS 19: Elaine Hagedorn, private citizen

Date Received: Dec 13, 2019, e-mail

Comment:

Water
1 message

Elaine Hagedorn <info@email.actionnetwork.org> Fri, Dec 13, 2019 at 12:54 AM
Reply-To: elainechm2@aol.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

Sir,

What an insult to all Iowans to think that impaired waterways is a condition we shouldn't be concerned about even upset about. How can you take so lightly a basic human right that we all have =clean water. How much filthy water are you willing to live with?

Would you get by for 19 months not taking requirements from IRS seriously? Why should we taxpayers put up with your delay in sharing this terrible news with us.

Solution =hire people who really care about the water situation in Iowa and willing to make every effort to make our waterways clean. Let's clean house at the DNR.

Peace,

Elaine Hagedorn
elainechm2@aol.com
5521 Aurora Ave. # 31
Des Moines, Iowa 50310

COMMENTS 20: Michael Benda, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Clean Water Concerns
1 message

Michael Benda <mbenda@comcast.net> Fri, Dec 20, 2019 at 2:03 PM
Reply-To: mbenda@comcast.net
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

I am very concerned that the Iowa DNR has been so late in delivering the Impaired Waterways List and appears not to be acting to protect Iowa's waterways.

In addition, I understand there is no published timeline to finish the surveys. This must be addressed.

Finally, I firmly believe that clean water is one of my rights and ask the DNR to do all in its power to work toward that goal.

Michael Benda
mbenda@comcast.net
1331 Chamberlain Drive
Iowa City, Iowa 52240-2926

COMMENTS 21: Jane Hey, private citizen

Date Received: Dec 21, 2019, e-mail

Comment:

Iowa's dirty water
1 message

Jane Hey <hey@morningside.edu> Sat, Dec 21, 2019 at 9:26 AM
Reply-To: hey@morningside.edu
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

I can't think of any family that would like to move to Iowa knowing that we have dirty water for children to wade in, and affecting our drinking water. Not sure why this report is so late but at the first of the year the IA Dnr should confront this problem and design a one year, 3 year and 5 year plan to develop strategies that will be evaluated to make our water safer.

Jane Hey
hey@morningside.edu
3518 Nebraska St
Sioux City IA, Iowa 51104

COMMENTS 22: Leslie Sand, private citizen

Date Received: Dec 26, 2019, e-mail

Comment:

Impaired waters
1 message

Leslie Sand <lessand52@gmail.com> Thu, Dec 26, 2019 at 10:26 PM
To: "daniel.kendall@dnr.iowa.gov" <daniel.kendall@dnr.iowa.gov>

Dear Mr. Kendall,

I live in Decorah Iowa, which as you know is on the Upper Iowa River. Our region, part of the "Driftless area", is known for its recreational use of its waterways; fishing, canoeing, kayaking and tubing. It disappoints me terribly to know that little progress has been made in the last few years in getting waterways, including the Upper Iowa, off the list of impaired waterways in the state. Furthermore, the DNR is not meeting its legal obligation to submit the 303(d) list by the statutory deadline, leaving Iowans in the dark about the status of their waters and putting them at risk.

It is my fervent desire that progress can be made soon in this vital area, which affects the health both physically and economically of residents and vacationers to our area, even the entire state. Work needs to be done regarding regulations of corporate agriculture, even to return to smaller farms that can be more responsive to the needs of the land. With the existential threat of the climate crisis, these matters are of the highest priority.

Thank you for your time and attention.

Leslie Sand, Decorah, IA

COMMENTS 23: Karen Kelleher, private citizen

Date Received: Dec 27, 2019, e-mail

Comment:

Comments DNR impaired waters


1 message

karen Kelleher <ksck54@hotmail.com>

Fri, Dec 27, 2019 at 10:04 PM

To: "daniel.kendall@dnr.iowa.gov" <daniel.kendall@dnr.iowa.gov>

Attached are my official comments.

 Comments DNR impaired waters 12-28-19.docx
28K

December 27, 2019

Iowa Department of Natural Resources
Attn: Dan Kendall
502 East 9th Street
Des Moines, IA 50319

RE: Draft 2018 List of Impaired Waters

Dear Mr. Kendall:

As a citizen advocate, I have been discouraged and disgusted by the adversary approach that has been taken to protecting our natural resources in our state. This report is almost two years overdue using old data, and we're adding hogs by the thousands every year.

You put lipstick on a pig, it's still a pig. This impaired waters list is hogwash.

Sincerely,

Karen Kelleher
2304 2nd St. SW
Altoona, IA 50009

COMMENTS 24: Laura Belin, private citizen

Date Received: Dec 28, 2019, e-mail

Comment:

comment on 2018 Impaired Waters List

1 message

Laura Belin <laurabelin@gmail.com>

Sat, Dec 28, 2019 at 10:13 AM

To: daniel.kendall@dnr.iowa.gov

Dear Mr. Kendall,

I am writing to you about the draft 2018 list of Section 303(d) impaired waters.

Others have the expertise to comment on more technical aspects of the Iowa DNR's assessments. (I note with concern that the Iowa Environmental Council identified many material omissions.)

But I want to focus on broader problems with the agency's process.

First: the Iowa DNR has not complied with federal law by failing to submit the 2018 Impaired Waters List to the U.S. Environmental Protection Agency by April 1, 2018. There is no valid reason for an agency to be more than a year and a half late to fulfill that obligation.

Second: the Iowa DNR is not on track to submit the 2020 Impaired Waters List by the legal deadline of April 1, 2020.

Third: the Iowa DNR relied on outdated data for the 2018 list. As the Iowa Environmental Council pointed out, "Iowans reviewing the draft 2018 list are looking at data from three or more years ago." To cite only one example, it does not take into account a bottled water advisory issued for the city of Greenfield during the summer of 2018.

It concerns me that in compiling the Impaired Waters List, the DNR did not use the most recent data. That suggests that the agency's goal was to report things are not getting worse, rather than providing an accurate snapshot of water quality in Iowa.

Fourth: the Iowa DNR has not followed the EPA's recommendations for a microcystin water quality standard. As a result, Iowans who use waterways for recreation are unnecessarily exposed to toxins.

The DNR's stated mission is "To conserve and enhance our natural resources in cooperation with individuals and organizations to improve the quality of life in Iowa and ensure a legacy for future generations." An important part of that work is implementing state and federal laws designed to reduce water pollution. Iowans should be able to expect the agency to use the best information possible and to meet all applicable state and federal deadlines for reporting on impaired waters.

Thank you for your consideration.

Yours,

Laura Belin
1705 Plaza Circle
Windsor Heights, IA 50324
(515) 276-6971

<http://www.bleedingheartland.com>

General Water Quality Emails and Letters Received:

The Iowa Department of Natural Resources received the following emails and letters on general water quality during the public comment period. The Iowa DNR acknowledges receipt of the comments; however, these comments do not directly apply to Iowa's 2018 Impaired Waters List.

COMMENTER 25: Patsy Martinson, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Water is life
1 message

Patsy Martinson <info@email.actionnetwork.org> Wed, Dec 11, 2019 at 8:11 AM
Reply-To: patsy.martinson@gmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

It is more than time to clean the waterways. We all need clean water for obvious reasons. Corporate farming should be reined in. Health is important, both of humans and animals and the beautiful earth. This is NOT political. Do the right thing. Investigate and act.

Patsy Martinson
patsy.martinson@gmail.com
716 Washington
Decorah, Iowa 52101

COMMENTER 26: Cherie Mortice, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Impaired Waterways Report
1 message

Cherie Mortice <info@email.actionnetwork.org> Wed, Dec 11, 2019 at 8:17 AM
Reply-To: cmortice@gmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

This reporting does little to give lowans confidence that the Iowa DNR is monitoring enough segments of our waterways to be useful to the public. Our sources of drinking water are still contaminated..., in fact, the number of impaired waterbodies went UP AGAIN. We are making ZERO progress to restore our precious waterways. Much of the problem is coming from poor oversight of the massive dumping of untreated manure on fields across Iowa.

Cherie Mortice
cmortice@gmail.com
2904 E 22nd Street
Des Moines, Iowa 50318

COMMENTER 27: Charlene Lange, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Please clean water

1 message

c lange <charlenelange@mediacombb.net>
Reply-To: charlenelange@mediacombb.net
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 8:20 AM

Dan Kendall,

Thank you for your work in the past but please increase your efforts to clean our waterways and hold back the floods. I want my grandkids to swim in clean lakes and not be effected by floods. Help us have clean water. Every year more and more waterways are affected.

c lange
charlenelange@mediacombb.net
1209 Diana St
Iowa City, Iowa 52240

COMMENTER 28: Rebecca Sanford, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Water is life

1 message

Rebecca Sanford <info@email.actionnetwork.org>
Reply-To: rjsanford78@gmail.com
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 8:33 AM

Dan Kendall,

Dear Mr. Dan Kendall,

I am writing you as a concerned CITIZEN from Iowa.

I am writing you, because I have 3 children, and I am desperately worried about their future.

Herbicides, and pesticides, are ruining our clean water ways. Pipelines going through water sources, are detrimental. Things need to change. And the people in charge are only out to make money. It is a vicious cycle, that is putting our lives in jeprodey.

It needs to change. The EPA is supposed to be protect us, not make it easier for the billionaires to make another dollar.

It's still legal to say all this, right?!?

Rebecca Sanford
rjsanford78@gmail.com
1835 695 Ave.
Albia, Iowa 52531

COMMENTS 29: Alice Bodson, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Our Water Quality

1 message

Alice Bodson <abodson@mchsi.com>

Wed, Dec 11, 2019 at 8:43 AM

Reply-To: abodson@mchsi.com

To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

Dear Mr. Kendall,

I'm writing to you today because my family is concerned about maintaining a high standard of water quality for ourselves and our state.

Please understand that I am not faulting your department's work. I am asking that you continue and complete your assessment of our waterways. From what I have learned from your assessment so far, a lot needs to be addressed. It is not the time for laissez-faire or ignoring the contribution of farmland run-off to the inferiority of our water supply. You, you and your agency need to step up to the challenge of our times. Clean water is the legacy you want to leave. Not...Leave it to Someone Else. Not be overpowered by corporate farms or powerful political and economic interests.

Thank you for your work on furthering your legacy of clean water.

Alice Bodson

Alice Bodson

abodson@mchsi.com

614 23rd St

[Des Moines, Iowa 50312](#)

COMMENTER 30: Richard Baker, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Clean waterways
1 message

Richard Baker <dick-baker@uiowa.edu> Wed, Dec 11, 2019 at 8:51 AM
Reply-To: dick-baker@uiowa.edu
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

Iowa has the worst water quality in streams, lakes, etc. This makes me furious! Iowa citizens deserve to have clean water in nature. The DNR needs to take actions to improve our waterways. Do your job!

Richard Baker
dick-baker@uiowa.edu
975 290th Street
Atalissa, Iowa 52720

COMMENTER 31: Lora Rathje, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Clean Water for Christmas
1 message

Lora Rathje <info@email.actionnetwork.org> Wed, Dec 11, 2019 at 8:53 AM
Reply-To: lmrathje@aol.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

All Iowans have a basic human right to clean water and air. If it costs farmers and integrators more money to farm in an environmentally responsible way and CAFOS to install pollution control technology, so be it, even if the increased cost of production is passed down to consumers. Please do your job to keep Iowa a healthy home for families. Do not bend to agricultural pressure motivated by profits. Do the right thing for the human race!

Lora Rathje
lmrathje@aol.com
4 Prairie Meadows Dr
Long Grove, Iowa 52756

COMMENTS 32: Omer Goodner, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Clean water

1 message

Omer Goodner <info@email.actionnetwork.org>
Reply-To: doug.goodner@gmail.com
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 8:55 AM

Dan Kendall,

On the one hand, I am thankful to have access to water so much cleaner and more plentiful than in much of the world.

On the other hand, I am disappointed with the cutbacks in governmental regulations, enforcement, and resources. The quality of our water, soil, forests, and air is going down, and Iowa and all of planet earth is in critical trouble.

I believe in the free market, but it isn't free when private businesses are allowed to do whatever they want. DNR must do its job to ensure the common good for all of us.

Omer Goodner
doug.goodner@gmail.com
811 3rd St
Kalona, Iowa 52247

COMMENTER 33: Virginia Meyer, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Clean water

1 message

Virginia Meyer <info@email.actionnetwork.org>
Reply-To: meyervk@gmail.com
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 9:05 AM

Dan Kendall,

Dear Mr. Kendall,

The latest report about Iowa's waters shows the water quality is worse than ever. The report was months late and not even complete. Over 500 waterways still need more monitoring. I haven't taken my family to our local beaches for several years as the water quality is so poor. You indicated that our ailing water quality is like the doctor saying the patient has high cholesterol, as if it is not necessary to do anything about it. I believe many folks die of heart disease when warning signs are left untreated. Our waters need attention! Science tells us that the unimpeded proliferation of factory farms and massive field runoff are the main culprits. It is the job of the DNR to protect our waters. You should be relentlessly protecting our water, soil, air, and the remnants of our natural world. We know the problem is worsening. What are you doing about the warning signs of decline and degradation? You know the causes, so why aren't you publicly and relentlessly pointing to and sanctioning the polluters? Only about 6% of Iowa farmers are using recommended conservation practices. This is not sustainable. Our waters are crying out for DNR'S help.

Respectfully,
Virginia Meyer
Lone Tree

Virginia Meyer
meyervk@gmail.com
5281 Wapsi Ave SE
[Lone Tree, Iowa 52755](https://www.google.com/maps/place/Lone+Tree,+Iowa+52755)

COMMENTER 34: Barbara Dale, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

We need clean water

1 message

Barbara Dale <nonrev909@neitel.net>
Reply-To: nonrev909@neitel.net
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 9:24 AM

Dan Kendall,

Our need and right to clean water continues to be denied by our state's agricultural dominance. Iowa's future depends not only upon its income from crops, but even more upon its livability for citizens. The legacy of chemical, industrial agriculture clearly is the poisoning of our greatest resources: soil, air and water. We must find a path for farmers to return to regenerative agriculture and commit ourselves to breaking the destructive habit of using poisons as if they were safe.

Barbara Dale
nonrev909@neitel.net
909 Vernon St.
Decorah, Iowa 52101-1653

COMMENTER 35: Emily Devine, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Clean water in IA.

1 message

Emily Devine <info@email.actionnetwork.org>
Reply-To: devinee07@gmail.com
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 10:19 AM

Dan Kendall,

It is important that for health reasons we have clean water. No more family farms not protecting us with good drainage or protected drainage..
No more putting monies ahead of concern for the people of IA.

Emily Devine
devinee07@gmail.com
1125 Prairie Dr. NE, none
Cedar Rapids, Iowa 52402

COMMENTER 36: Alison Wasielewski, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Impaired waterways, water quality

1 message

Alison Wasielewski <info@email.actionnetwork.org>
Reply-To: alisonwas@aol.com
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 10:53 AM

Dan Kendall,

Of the over 1,400 segments from streams, rivers, lakes, and wetlands that the DNR investigated:

Only 363 segments fully met Iowa's water quality standards

767 segments are impaired

523 segments are still in need of further investigation

The DNR has no timeline to finish the investigations that need to be done. With the status of over 500 segments unknown, there is a possibility that over 90% of the segments are impaired.

This confirms what Iowa CCI members have been saying all along: the state of Iowa is failing to protect Iowa's waterways.

Alison Wasielewski
alisonwas@aol.com
2000 N. Court St. trlr 1-K
Fairfield, Iowa 52556

COMMENTER 37: Kenn Hubel, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

livestock poop

1 message

Kenn Hubel <info@email.actionnetwork.org>
Reply-To: khubel11@gmail.com
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 11:39 AM

Dan Kendall,

Recall the children's story called Everybody Poops? Everybody includes cattle. Cattle poop much greater amounts of poop. The poop of men, women and children is channeled into sewage sanitary plants to prevent human disease. Measures should be taken to minimize contamination of our water supply from voluminous animal poop. It makes sense, doesn't it?

Kenn Hubel
khubel11@gmail.com
735 George St/
Iowa City, Iowa 52246

COMMENTER 38: Ava Auen-Ryan, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Clean water should be the first priority

1 message

Ava Auen-Ryan <ava@iowacci.org>
Reply-To: ava@iowacci.org
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 11:48 AM

Dan Kendall,

Iowans have a right to clean water, whether it is recreating or drinking water. It should be the first priority of the DNR to confront our water quality crisis head on, not cow tail to the Farm Bureau and other commodity groups. Do your job! And, face the negative impact that industrial ag is having on our water. It's no time for half measures - we need the DNR to enforce regulations on the factory farm industry and protect our right to clean water.

Ava Auen-Ryan
ava@iowacci.org
650 16th St
Des Moines, Iowa 50314

COMMENTER 39: L. Darrel Wrider, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Clean Water for Iowa

1 message

L. Darrel Wrider <info@email.actionnetwork.org>
Reply-To: darrelwrider@yahoo.com
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 11:58 AM

Dan Kendall,

We have at least 750 impaired water ways in Iowa. The DNR is doing nothing to reduce this number and is denying the severity of the problem. The DNR should lobby the state legislature for the money to rectify the problem. Furthermore, DNR should create a plan to clean the water with goals and completion dates.

L. Darrel Wrider
darrelwrider@yahoo.com
3816 Wenig Rd., NE
Cedar Rapids, Iowa 52402

COMMENTER 40: Leslie Carpenter, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

I want clean water

1 message

Leslie Carpenter <info@email.actionnetwork.org>
Reply-To: leslieac789@gmail.com
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 12:48 PM

Dan Kendall,

DNR the poor water quality in Iowa is shameful! I worked for DEQ in the late 1970s then left for the west to study environmental science. In those days we were hopeful for improving environment in Iowa. Silly me. I returned a few years ago with many years of environmental protection work experience and hoping to use my sea kayak in local lakes and loe and behold this state is even dirtier than before. The lack of clean recreational water affects my recreation choices directly. There is no way I am going to do kayak rescues and strokes in any Iowa water. It's filthy! Your failure to enforce clean water standards affects all of us from me to the nephew who wants to introduce his kid to kayaking. Wonder why people leave Iowa? The alternative is take our gear and recreation dollars to the lakes in Minnesota. EXPLAIN to me why you let farms and business use and pollute this resource at no cost and make me travel to find safe water for recreation?

Leslie Carpenter
leslieac789@gmail.com
2490 hunters ridge rd
Marion , Texas 52392

COMMENTER 41: Dixie Webb, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Clean water

1 message

Dixie Webb <info@email.actionnetwork.org>
Reply-To: dwebb4451@gmail.com
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 1:48 PM

Dan Kendall,

Clean water is the right of every human being. It is necessary for a healthy life. The DNR needs to be working overtime to make sure every waterway in the state is flowing with clean water. The time is now to eliminate run-offs that are contaminating Iowa's water. Please make this issue your number one priority in 2020!

Dixie Webb
dwebb4451@gmail.com
214 NW Abilene Rd
Ankeny, Iowa 50023-2111

COMMENTS 42: Allison Castle, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Clean Water Is Important!

1 message

allison Castle <info@email.actionnetwork.org>
Reply-To: ajcastle@hotmail.com
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 2:21 PM

Dan Kendall,

It is very upsetting to see the increase in impaired waterways in Iowa. Clean water is an important basic right that impacts the health and safety of my family and all Iowa residents. Iowa needs to take the federal Clean Water Act seriously and report data timely so that action can be taken to improve the water quality in Iowa.

allison Castle
ajcastle@hotmail.com
2569 Canterbury Rd
[Muscatine, Iowa 52761](https://www.google.com/maps/place/Muscatine,+Iowa+52761)

COMMENTER 43: Constance Sanderbeck Skinner, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Clean water is a necessity

1 message

Constance Sanderbeck Skinner <info@email.actionnetwork.org>
Reply-To: csndrbck@yahoo.com
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 3:36 PM

Dan Kendall,

Dear Mr Kendall,

I find your comment about the DNR report comparing dirty water to 'high cholesterol' reflects badly on you . Insulting, to say the least.. Your trivialization of the situation disqualifies you to work in water issues in Iowa. Please resign immediately.

Constance Skinner

The Little Old Lady in Tennis Shoes of Ankeny

Constance Sanderbeck Skinner

csndrbck@yahoo.com

514 SW Irvinedale Dr

Ankeny, Iowa 50023

COMMENTER 44: Constance Sanderbeck Skinner, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Mr Bruner

1 message

Constance Sanderbeck Skinner <info@email.actionnetwork.org>
Reply-To: csndrbck@yahoo.com
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 3:39 PM

Dan Kendall,

My letter, written to Mr Kendall, is actually intended for Mr Bruner.

Please forward the message to him.

Thank you

Constance Skinner

Ankeny

Constance Sanderbeck Skinner

csndrbck@yahoo.com

514 SW Irvinedale Dr

Ankeny, Iowa 50023

COMMENTER 45: Kay Pence, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

clean water
1 message

Kay Pence <info@email.actionnetwork.org> Wed, Dec 11, 2019 at 3:45 PM
Reply-To: kpence705@gmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

Clean water is essential for life. Iowa's waterway impairments are rapidly increasing. It is clear that voluntary regulation is failing. We need to act before it is too late. We need regulation that requires polluters to pay to clean up their own messes.

Kay Pence
kpence705@gmail.com
20642 270th Street
Eldridge, Iowa 52748

COMMENTER 46: Sharon Johnson, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Iowa's Polluted Waters
1 message

sharon johnson <info@email.actionnetwork.org> Wed, Dec 11, 2019 at 4:28 PM
Reply-To: sharonrjohnson62@hotmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

Over half of Iowa's waters are polluted! OMG! Clean, unpolluted, water means HEALTH. I've been in health care my entire life, and have steadily seen allergies, autoimmune, neurogenic (like autism, ADHD, etc) conditions increase along with the number of polluted waterways in Iowa. Not to mention Big Ag's contribution to Iowa as one of the top states for CANCER. WE NEED CLEAN WATER IN IOWA. Health is a human right, and it starts with clean water!

sharon johnson
sharonrjohnson62@hotmail.com
6501 Washington ave
Windsor Heights, Iowa 50324

COMMENTER 47: Del Holland, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Impaired waters list
1 message

Del Holland <delholland@aol.com> Wed, Dec 11, 2019 at 4:34 PM
To: daniel.kendall@dnr.iowa.gov

Daniel,

I am greatly concerned about the quality of Iowa's waters and their continuing worsening condition. I hope the DNR will use this list to lobby the legislature to enact stricter rules and regulations to improve our water quality.

Del

COMMENTER 48: Brian Walshire, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Clean Water
1 message

Brian Walshire <info@email.actionnetwork.org> Wed, Dec 11, 2019 at 4:59 PM
Reply-To: bdwalshire@gmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

I am angry that we didn't get mandatory setbacks from our streams and rivers from farming. We our hurting our access to clean water and recreational opportunities for our state. We all need to work together to solve this problem. Thanks for your time. Brian Walshire

Brian Walshire
bdwalshire@gmail.com
2730 Coots Blvd Unit 13
[Rowley Iowa 52329](http://Rowley.Iowa.52329)

COMMENTER 49: David Brown, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

clean water
1 message

david brown <info@email.actionnetwork.org> Wed, Dec 11, 2019 at 5:29 PM
Reply-To: d371975@hotmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

Why can't we have clean water in Iowa for now and the future?

david brown
d371975@hotmail.com
6216 edwards ave.
des moines, iowa 50312-1543

COMMENTER 50: Marilyn Hall, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Dirty Water

1 message

Marilyn Hall <mch1500@msn.com>
Reply-To: mch1500@msn.com
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 6:11 PM

Dan Kendall,

The level of impairment of our waterways is unacceptable. It's time to stop the constant denial of the seriousness of this matter and take action. Everyone needs clean water! Don't let corporations continue to poison us with their unconscionable neglect of our environment.

Marilyn Hall
mch1500@msn.com
1500 60th St
Des Moines, Iowa 50321

COMMENTER 51: Joni Yeoman, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Clean Water is a right

1 message

Joni Yeoman <info@email.actionnetwork.org>
Reply-To: wejies2@gmail.com
To: daniel.kendall@dnr.iowa.gov

Wed, Dec 11, 2019 at 7:30 PM

Dan Kendall,

We need an immediate moratorium on factory farms and the practice of allowing them to spread raw manure as fertilizer. I live near Lake Rathbun (my water source) and we were inflicted with foul air and unusable water as well we were unable to recreate at the lake this past summer due to the algae blooms. Do your job for the people of Iowa, our children and grandchildren. Do all you that you can to advocate for clean water. Stop this unfettered corporate insanity.

Sincerely,

Joni L. Yeoman

Joni Yeoman
wejies2@gmail.com
41807 290th trail
russell, Iowa 50238

COMMENTER 52: Lu Ann Frisch, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Clean Water for Iowa
1 message

Lu Ann Frisch <info@email.actionnetwork.org> Wed, Dec 11, 2019 at 8:01 PM
Reply-To: frischlag@aol.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

Silly me....all along, I just PRESUMED the DNR would find the subject matter of clean water at the very tip top of their priority list !!!!!!!

Lu Ann Frisch
frischlag@aol.com
935 Applewood Court
Coralville, Iowa 52241

COMMENTER 53: Bryn Pangburn, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

CLEAN WATER
1 message

Bryn Pangburn <info@email.actionnetwork.org> Wed, Dec 11, 2019 at 8:52 PM
Reply-To: northstarbryn@gmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

CLEAN WATER FOR LIFE! The residents of beautiful Iowa deserve clean water. It should not be raped and pillaged to raise hogs for China. Iowans should NOT BE DYING OF CANCER because of contaminated waterways and aquifers, to help the rich get richer. In the last election 10 BILLIONAIRES FUNDED REPUBLICAN CAMPAIGNS TO HELP BILLIONAIRES. TheyDON'T LIVE HERE. THEY DON'T DRINK THE WATER. DO YOU HAVE CHILDREN THAT LIVE HERE AND DRINK THE WATER WATER!!! Did you VOTE for them over your children.

Bryn Pangburn
northstarbryn@gmail.com
1418 490th street
Northwood, Iowa 50459

COMMENTS 54: Beth Shields, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

clean water is a human necessity
1 message

Beth SHIELDS <shieldsb@dwx.com> Wed, Dec 11, 2019 at 9:25 PM
Reply-To: shieldsb@dwx.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

Clean water is a basic human right! And, downplaying the severity of over half our waterbodies being impaired is a gross misrepresentation of the clean water crisis we are in. Your work is so very disappointing for the people of Iowa. I know you can do better. You can do what is right for the people of Iowa by doing your job thoroughly and accurately. Any impairments in Iowa's water quality are too many.

Beth SHIELDS
shieldsb@dwx.com
608 Main St
Adel, Iowa 50003

COMMENTS 55: Shari Hawk, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Iowa Clean Water
1 message

Shari Hawk <info@email.actionnetwork.org> Wed, Dec 11, 2019 at 10:06 PM
Reply-To: sharihawk@hotmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

Mr. Kendall,

I am very concerned about the increase in impaired and polluted waterways in Iowa. This is totally unacceptable in a once pristine state. The DNR can take steps to improve the state of our water, such as not continuing to approve more new and expanded factory farms. There is no way our waterways can accommodate the huge amounts of untreated manure that finds their way into our rivers and lakes.

Shari Hawk
sharihawk@hotmail.com
401 NE Crestmoor PI
Ankeny, Iowa 50021-1927

COMMENTS 56: Gregory Twedt, private citizen

Date Received: Dec 11, 2019, e-mail

Comment:

Clean water
1 message

Gregory Twedt <info@email.actionnetwork.org> Wed, Dec 11, 2019 at 10:46 PM
Reply-To: gatwedt@gmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

It troubles me so much that our Iowa rivers and streams are so impaired. I would ask you to look to Minnesota as a model of what can be accomplished with simple and reasonable regulations

Gregory Twedt
gatwedt@gmail.com
3304 Main Street Road
Marshalltown, Iowa 50158

COMMENTS 57: Kenn Bowen, private citizen

Date Received: Dec 12, 2019, e-mail

Comment:

Failure to Protect
1 message

Kenn Bowen <info@email.actionnetwork.org> Thu, Dec 12, 2019 at 9:34 AM
Reply-To: ckmbowen@gmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

The state of Iowa is failing to protect Iowa's waterways.

Roger Bruner, the supervisor of the DNR water monitoring and assessment program, has described the 767 impairments as "fairly minor" and claimed the list is "like going to the doctor and finding out you have high cholesterol".

Clean water is a basic human right; and, downplaying the severity of over half our waterbodies being impaired is a gross misrepresentation of the clean water crisis in which we find ourselves.

Mr. Kendall, I call upon you to do your job, to do what is good and right, to protect Iowa's Waterways.

Kenn Bowen
ckmbowen@gmail.com
1210 Village Rd
Iowa City, Iowa 52240-2835

COMMENTS 58: Jacob Moore, private citizen

Date Received: Dec 12, 2019, e-mail

Comment:

DNR Waterways

1 message

Jacob Moore <info@email.actionnetwork.org>
Reply-To: jkmoore@gmail.com
To: daniel.kendall@dnr.iowa.gov

Thu, Dec 12, 2019 at 11:57 AM

Dan Kendall,

Clean Water is part of DNR's responsibility to Iowans. It is a known fact that our waters are polluted and not in good shape. This affects fishing, wildlife, drinking water and well water, to name just a few. Please do your part and hold Factory farms, agriculture and other responsible parties accountable for the pollution they create.

I own a pond which suffers from algal blooms from farming run off. This affects the fish we get from the pond as well. We'd like to swim in the pond without fear of contaminants.

The only way a free market works is if responsible parties are held accountable for their actions. Please do your part to help average Iowans enjoy clean water.

Jacob Moore
jkmoore@gmail.com
7151 Geneva St
Indianola, Iowa 50125

COMMENTER 59: Beth Peterson, private citizen

Date Received: Dec 12, 2019, e-mail

Comment:

Iowa's water quality

1 message

Beth Peterson <info@email.actionnetwork.org>
Reply-To: beth.e.peterson@gmail.com
To: daniel.kendall@dnr.iowa.gov

Thu, Dec 12, 2019 at 12:29 PM

Dan Kendall,

Every so often, I see a news story on TV about the part that Iowa farm run-off plays in the Gulf's dead zone, and it's a BIG part. Once, tho, I saw a story where some Iowa ag experts (maybe including some scientists) were at the Gulf to examine the situation closely, and I was heartened to think that this was even happening! Sadly, a few years have passed and I see that little has changed. Why can't all parties - not just farmers (tho they're major players here), but fuel companies of every sort, Iowa factories and the Iowa legislature - share whatever burden they must bear to clean up our waterways? And by sharing, I mean the financial cost of doing business while keeping our waterways clean. Spread the cost around... and I'll vote for a legislature that can think beyond party politics for the sake of Iowa's water and not keep selling our resources to the highest bidder.

Thank you.

Beth Peterson
beth.e.peterson@gmail.com
309 N. 7th Ave.
[Iowa City, Iowa 52245](#)

COMMENTER 60: Patricia Fuller, private citizen

Date Received: Dec 13, 2019, e-mail

Comment:

Water Quality

1 message

Patricia Fuller <info@email.actionnetwork.org>
Reply-To: patriciafuller1@hotmail.com
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 13, 2019 at 8:57 PM

Dan Kendall,

The DNR is not taking the problems of Iowa's streams seriously. We all deserve to have access to clean water. Corporate agriculture in our state needs to address the amount of pollution they are causing to our streams but also the downstream pollution that is contributing to the dead zone in the Gulf.

Patricia Fuller
patriciafuller1@hotmail.com
26 Pickard Ln
[Council Bluffs, Iowa 51501](#)

COMMENTER 61: Bryn Pangburn, private citizen

Date Received: Dec 14, 2019, e-mail

Comment:

CLEAN WATER
1 message

Bryn Pangburn <info@email.actionnetwork.org> Sat, Dec 14, 2019 at 8:23 AM
Reply-To: northstarbryn@gmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

All life depends on clean water. Your families your children, your parents, your pets, your friends, your everything. Make your passion clean water. Don't let corporate GREED BECOME YOUR GOD. Do your job and fight for beautiful Iowa. We need Clean Water!!!! With HOPE for the future of Iowa families, Bryn Pangburn

Bryn Pangburn
northstarbryn@gmail.com
1418 490th street
[Northwood, Iowa 50459](#)

COMMENTER 62: Nancy Weber, private citizen

Date Received: Dec 14, 2019, e-mail

Comment:

Iowans deserve clean water
1 message

Nancy Weber <info@email.actionnetwork.org> Sat, Dec 14, 2019 at 5:38 PM
Reply-To: weber.nancy@gmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

Mr. Kendall ~
All Iowans have a right to clean water.

The DNR finally released the Impaired Waterways List and it proved what Iowa CCI members have been saying all along: the state of Iowa is failing to protect Iowa's waterways.

Please work for clean water!

Nancy Weber
weber.nancy@gmail.com
500 Whiting Avenue
[Iowa City, Iowa 52245](#)

COMMENTER 63: Tony Wobeter, private citizen

Date Received: Dec 15, 2019, e-mail

Comment:

Clean Water
1 message

Tony Wobeter <wobtj@mchsi.com> Sun, Dec 15, 2019 at 4:51 PM
Reply-To: wobtj@mchsi.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

Dear Mr. Dan Kendall,

Please address the issue of Clean water and present actions that can be taken by Iowans in Rural and Large population centers to promote all individuals to act in ways that preserve our good water supply for us and future generations.

Thank You!

Tony Wobeter
wobtj@mchsi.com
2605 Bluffwood Circle
[Iowa City, Iowa 52245](#)

COMMENTER 64: Judith Eastburn, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Clean water
1 message

Judith Eastburn <info@email.actionnetwork.org> Fri, Dec 20, 2019 at 8:26 AM
Reply-To: JLeastburn@gmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

The quality of Iowa's water is decreasing at an alarming rate, due to many factors. Factory farms with their enormous waste runoff and overuse of fertilizer that winds up running into creeks and rivers are two major areas that need to be recognized and subjected to oversight. Once water is unsafe, it cannot be restored. Please vote to protect this valuable natural resource.

Judith Eastburn
JLeastburn@gmail.com
3909 Lincoln Place Drive
[Des Moines, Iowa 50312](#)

COMMENTER 65: Emily Devine, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Clean water for IA.
1 message

Emily Devine <info@email.actionnetwork.org> Fri, Dec 20, 2019 at 8:35 AM
Reply-To: devinee07@gmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

The people of IA need clean water. Mr. Kendall please check into this more.

Emily Devine
devinee07@gmail.com
1125 Prairie Dr. NE, none
Cedar Rapids, Iowa 52402

COMMENTER 66: Annalisa Miller, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Clean up Iowa's waterways
1 message

Annalisa Miller <info@email.actionnetwork.org> Fri, Dec 20, 2019 at 8:55 AM
Reply-To: annalisacmiller@gmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

Please enact policies to clean up Iowa's waterways now! The level of pollution is unacceptable, it is a health risk for our people and our environment, and a major contributor to the deadzone in the Gulf of Mexico. Have you ever traveled down there, they are so angry at Iowa because of all the farm runoff that we allow downstream. Iowa's farming industries should incorporate regenerative practices to protect Iowa's natural resources! Clean water now!

Annalisa Miller
annalisacmiller@gmail.com
51 E Stone Ave
Fairfield, Iowa 52556

COMMENTER 67: Bryn Pangburn, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

CLEAN WATER
1 message

Bryn Pangburn <info@email.actionnetwork.org> Fri, Dec 20, 2019 at 8:57 AM
Reply-To: northstarbryn@gmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

To the DNR, As a life long resident of Iowa I deserve clean water. MY children who were born and raised here deserve clean water. MY parents who raised me here in Iowa deserve clean water. MY friends and neighbors deserve clean water in the beautiful state they live in, IOWA. We have a lifetime of investment here and we deserve clean water. Money does Not have the right to silently murder us all. I remember a time in Iowa where we raised a lot of hogs and still had clean water. Corporate Ag does not work for MAN OR BEAST. Fight for truth! Fight for Iowa! Fight for Iowans! No excuses, be a true patriot! Sincerely, Bryn Pangburn

Bryn Pangburn
northstarbryn@gmail.com
1418 490th St
Northwood, Iowa 50459

COMMENTER 68: Bhavani Mair, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Clean water in Iowa
1 message

Bhavani Mair <info@email.actionnetwork.org> Fri, Dec 20, 2019 at 9:07 AM
Reply-To: bhavani.ma@yahoo.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

Water is the essence of our body and a key factor to good health. Everyone deserves clean water. Iowa's water is highly polluted due to toxic chemical runoff from farms, to industries, and to CAFOs.

Your job is to ensure that our water is safe and pure. At this point, it is not even close to that. For ourselves, for our children, for our future, please do your job and stringently protect our water!

Bhavani Mair
bhavani.ma@yahoo.com
1562 Nipa Blvd.
Fairfield, Iowa 52556

COMMENTER 69: Cheryl Fraracci, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Clean Water in Iowa

1 message

Cheryl Fraracci <info@email.actionnetwork.org>
Reply-To: fraraccic@gmail.com
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 20, 2019 at 9:15 AM

Dan Kendall,

Mr. Kendall,

I am concerned about our waterways being sacrificed on the altar of commerce. It is government's obligation and duty to protect its citizens from the excesses of capitalism. Capitalism is an amoral system and is built on the premise of returning a profit to its shareholders. It only becomes moral or immoral by choice (stated or implied). Democracy (government), on the other hand, is built on moral principles and becomes amoral or immoral by choice (stated or implied). I'm asking you to take the moral stand and protect the citizens of Iowa.

Sincerely,
Cheryl Fraracci

Cheryl Fraracci
fraraccic@gmail.com
1009 Kingman Circle
[Des Moines, Iowa 50311](https://www.google.com/maps/place/Des+Moines,+Iowa+50311)

COMMENTER 70: Bambi Yost, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Water quality needs to be improved

1 message

Bambi Yost <byost@iastate.edu>
Reply-To: byost@iastate.edu
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 20, 2019 at 9:23 AM

Dan Kendall,

Dear DNR,

Water is a precious resource. Currently the state of Iowa is failing to meet EPA standards which diminishes quality of life for all living creatures in these impaired waterways. Why aren't we doing more? Both the east and west coast take water quality far more seriously. As a landscape architect, I know that affordable and sustainable solutions exist. We simply must do more. We can offer substantial incentives and grants to landowners. We can provide better education to promote the numerous benefits of improved water quality such as: increased land value, better habitat, lower cost for safe drinking water, improved aquifer water supplies, and the very obvious, improved surface water for recreational purposes. It is appalling that we are not doing more. Please push for increased funding, tax incentives, and educational outreach as well as stronger and better enforced policies with substantial fines for large businesses.

Thank you,
Bambi Yost

Bambi Yost
byost@iastate.edu
212 S Hazel Ave
Ames, Iowa 50010

COMMENTER 71: Anne Clark, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

clean water

1 message

Anne Clark <info@email.actionnetwork.org>
Reply-To: anneclark47@gmail.com
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 20, 2019 at 9:34 AM

Dan Kendall,

Mr. Kendall, Iowa Department of Natural Resources. That says it all. DNR's job is to protect our most precious resources, not to do the bidding of the farm bureau. Water is life and filthy impaired waterways do not support life. Do your job and hold polluters accountable and clean up this mess.

Anne Clark
anneclark47@gmail.com
Kingman Rd
Ames, Iowa 50014

COMMENTER 72: Ginny Swift, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Clean up your act

1 message

Ginny Swift <ginswift@mchsi.com>
Reply-To: ginswift@mchsi.com
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 20, 2019 at 10:11 AM

Dan Kendall,

Before it's too late please clean up your act, do your job so we here in Iowa can have clean water to drink and enjoy. It's truly sad that I have to 'pay' to purify my home drinking water to remove known impurities. But when I'm enjoying the outdoors and want to wade in a creek or lake with my grandchildren I can't, for fear of toxins leaching through our skin.

Please do your job and return clean water to Iowa.

Thank you.

Ginny Swift
ginswift@mchsi.com
8152 Dellwood Dr
Urbandale , Iowa 50322

COMMENTER 73: Terry Lowman, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Protect Iowa's water

1 message

Terry Lowman <info@email.actionnetwork.org>
Reply-To: terryLeeLowman@gmail.com
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 20, 2019 at 10:16 AM

Dan Kendall,

There's a lot we can do to stop treating our rivers like sewers. Our farm is on the Des Moines River and despite my love of fishing, there's no way I'm eating anything that comes from that cesspool.

Terry Lowman
terryLeeLowman@gmail.com
3425 VALLEY VIEW RD
AMES, Iowa 50014-4616

COMMENTER 74: Charlene Lange, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

clean water please

1 message

charlene lange <charlenelange@mediacombb.net>
Reply-To: charlenelange@mediacombb.net
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 20, 2019 at 10:19 AM

Dan Kendall,

It's winter in Iowa and I have dreams of lazy summer days by a lake swimming, fishing, and enjoying the fresh air.

Those dreams didn't happen this past summer because of the algae blooms and dead fish.

I am hoping that these dreams can become true in 2002.

Every year Iowa has more and more rivers, streams and lakes not good for humans or animals.

Every year more and more wells are compromised.

Please help us, help farmers and help animals have safe waters in Iowa.

charlene lange
charlenelange@mediacombb.net
1209 Diana St
Iowa City, Iowa 52240

COMMENTER 75: Richard Baker, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Clean waterways

1 message

Richard Baker <dick-baker@uiowa.edu>
Reply-To: dick-baker@uiowa.edu
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 20, 2019 at 10:38 AM

Dan Kendall,

This should be a no-brainer! There are several ways of decreasing runoff of the various pollutants. We all should have access to clean water in our lakes and rivers. Eliminate CAFOs, stop using dangerous pesticides, use some of the methods to decrease farm runoff, and several others. ACT NOW!

Richard Baker
dick-baker@uiowa.edu
975 290th Street
Atalissa, Iowa 52720

COMMENTS 76: Luke Wright, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

OUR WATER

1 message

Luke Wright <info@email.actionnetwork.org>
Reply-To: lukewright60@yahoo.com
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 20, 2019 at 10:51 AM

Dan Kendall,

To Mr Dan Kendall

I am writing today in regards to Iowa's waterways and their impairments.

The land under the rivers/streams/creeks belong to the landowner over which it flows. BUT THE WATER BELONGS TO THE PEOPLE OF IOWA! The impairment of 2/3 of our water resources are a stark reality that needs to be addressed ASAP. There are two things humans can't live without; oxygen and H₂O! Our state is in a rapid state of decline and it needs to be fixed.

PLEASE do your jobs or let some else who gives a damn do it and get out of the way!

Regards, J Luke Wright

Luke Wright

lukewright60@yahoo.com

235 East Water Ave, po box 124

Wadena, Iowa 52169

COMMENTER 77: Karen Safris, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Clean Water

1 message

Karen Safris <info@email.actionnetwork.org>
Reply-To: karen_safris@yahoo.com
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 20, 2019 at 11:32 AM

Dan Kendall,

I am very concerned about the state of Iowa's waterways. My concern is that the number of impaired waterways is increasing and we are not meeting the Clean Water Act. My concern is one of public health, personal health, and recreation.

I would like for the DNR to make this a top priority for the upcoming year and reverse the dangerous trend and begin to get our state back to a balance that works for everyone.

Sincerely,

Karen Safris

Karen Safris
karen_safris@yahoo.com
2949 Prairie Rose Drive
Norwalk, Iowa 50211

COMMENTER 78: Steve Monk, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Environment

1 message

steve monk <sgmonk@dmacc.edu>
Reply-To: sgmonk@dmacc.edu
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 20, 2019 at 11:54 AM

Dan Kendall,

I am writing to urge you to make clean water a priority in Iowa. My family uses Iowa waterways every year, whether we are at the beach, canoeing, or fishing. Now I have to check for pollution for our safety. What has been done until now to manage our waterways in Iowa is not working.

They seem to be getting dirtier if anything.

Thank you for your time.

steve monk
sgmonk@dmacc.edu
335 juliana ct
polk, Iowa 50226

COMMENTS 79: Jeff Kisling, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Impaired waterways list

1 message

Jeff Kisling <info@email.actionnetwork.org>
Reply-To: jakislin@outlook.com
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 20, 2019 at 1:18 PM

Dan Kendall,

The state of Iowa is failing to protect Iowa's waterways.

Iowa is home to over 10,000 factory farms that pollute our water, hurt rural economies, and degrades our quality of life.

For too long, the state of Iowa has put the profits of corporate ag over the protection of our natural resources and communities.

I urge you to help us maintain clean waterways.

Jeff Kisling
jakislin@outlook.com
1227 Wesley Lane
Indianola, Iowa 50125

COMMENTS 80: Rick Robinson, Conservation & Natural Resources Policy Advisor, Iowa Farm Bureau Federation

Date Received: Dec 20, 2019, e-mail

Comment:

Iowa Farm Bureau Federation 303(d) List Comments

1 message

Rick Robinson <rrobinson@ifbf.org>

Fri, Dec 20, 2019 at 1:49 PM

To: "daniel.kendall@dnr.iowa.gov" <daniel.kendall@dnr.iowa.gov>

Please accept the attached comments from the Iowa Farm Bureau Federation on the draft 303(d) list and enter them into your record. Thank you.

Rick Robinson

Conservation & Natural Resources Policy Advisor

[Iowa Farm Bureau Federation](#)

5400 University Ave.

West Des Moines, IA 50266

515-225-5432

rrobinson@ifbf.org


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ConservationCountsIowa.com



WWW.IOWAFARMBUREAU.COM/100

 DNR Impaired Waters List Comments 12.20.19.pdf
150K



December 20, 2019

Mr. Dan Kendall
Water Quality Monitoring & Assessment Section
Iowa Department of Natural Resources
Wallace State Office Building
502 East 9th Street
Des Moines, IA 50319

Iowans can take great pride knowing that water quality stakeholders – including Iowa farmers - have accepted the challenge of protecting and improving Iowa’s water quality. The Iowa Farm Bureau Federation, the state largest general farm organization with almost 157,000 members, appreciates the efforts that Iowans invest in protecting our water and soil.

The latest Clean Water Act Section 303(d) list by the Department of Natural Resources confirms only a slight 2 percent increase in the number of impaired waters, the smallest increase in recent reporting cycles. DNR experts say a steady growth in the number of tested waters and the increasingly stringent standards for each reporting period is driving the increase. But most importantly, the DNR also says Iowans can be confident that the vast majority of Iowa’s waters continue to be safe for recreation and fishing.

Iowa farmers have responded to the kind of information in this report over the years by actively participating in several state and federal soil and water conservation programs or in establishing their own new practices and structures. Examples of their long-term progress include:

- The value of the long-term investment by farmers and the public is estimated at \$6.2 billion, according to a 2018 statewide LiDAR mapping of just six types of conservation practices (terraces, ponds, grassed waterways, water and sediment control basins, contour strip cropping and contour buffer strips/prairie strips).
- An Iowa State University survey showing most farmers report increased use of soil testing, precision farming practices, decreases in fall nitrogen applications and more in-season applications, and increases in construction of conservation structures like terraces, grassed waterways and sediment control basins.
- A more than 20-fold increase in the acres planted to cover crops to more than 1.6 million acres, a 6-fold gain in restored wetlands, and a 4.5-fold gain in acres protected by cost-shared terraces in recent years.

Despite the clear trends of conservation gains over the long-term, we agree with the department that the report results do not mean that water quality is getting worse. This report is not designed to gauge changing water quality trends or the magnitude of impairments or improvements, the department says, or the extent to which a stream or lake does not meet state water quality standards established for their intended beneficial uses, such as swimming, fishing or drinking water. Water quality officials and state and federal natural resource agencies look at other available data and conduct other analysis for those needs. Those reports can be detailed, complex and often conflicting. Rather, this latest biannual report is a only a snapshot of where the state is relative to monitored streams and lakes meeting the established water quality standards' threshold to protect their beneficial uses.

We are also appreciative of the department's effort to inform the public and provide us all context as to the variety of reasons why a water segment may make one of the various parts of the list, and in explaining the factors affecting that threshold, including variable weather, stricter standards and more intense monitoring. We have learned that it's not always due to human activity, but sometimes is.

Additional context provided by the department in this report includes:

- 17 water segments and 27 previously impaired beneficial uses are proposed by DNR to be removed from the 2016 list due to new data, errors found or documented water quality improvements (*Note: 56 previously impaired beneficial uses were removed from the 2016 list in the last reporting cycle.*)
- 363 water segments fully met the Iowa water quality standards for their intended use;
- 523 were identified as waters in need of further investigation;
- 145 were considered impaired but a TMDL was already completed or is not needed;
- 622 did not fully meet the standards needed for their intended use and will be prioritized for a TMDL (or watershed plan); and,
- 1,142 segments and 1,040 beneficial uses were not assessed.

While the challenge of improving Iowa's water quality remains an ongoing effort, Iowans can be confident the monitoring and collaborative efforts to improve Iowa's water quality are achieving results. Additionally, this list helps our state and federal natural resource agencies continue their targeting available financial and technical resources to where they're needed most and are most effective. All Iowans – including farmers - have high expectations for our water quality, and it's clear state officials, natural resource managers, and other experts are using this report as a one tool to help them continue to guide our water quality improvement efforts.

Sincerely,



Rick Robinson
Conservation & Natural Resources Policy Advisor

COMMENTER 81: David Brown, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

clean water
1 message

david brown <info@email.actionnetwork.org> Fri, Dec 20, 2019 at 2:20 PM
Reply-To: d371975@hotmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

We the people ... in order to... promote the general welfare,... do... establish this Constitution..."
To me, the general welfare includes clean water. The right to clean water should be spelled out in the Bill of Rights.

david brown
d371975@hotmail.com
6216 edwards ave.
[des moines, iowa 50312-1543](#)

COMMENTER 82: Joseph Wyse, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

We Want Clean Water for Christmas !
1 message

Joseph Wyse <info@email.actionnetwork.org> Fri, Dec 20, 2019 at 2:30 PM
Reply-To: wyse888@me.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

To the DNR -- via the New England Patriots Head Coach -- " Just Do Your Job ! " . . .

Joseph Wyse
wyse888@me.com
320 E. Washington St., #7C
[Iowa City, Iowa 52240-3935](#)

COMMENTER 83: Mary Kirkpatrick, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Clean up our water!!!

1 message

Mary Kirkpatrick <patchworkmaryj@msn.com>
Reply-To: patchworkmaryj@msn.com
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 20, 2019 at 7:14 PM

Dan Kendall,

I have lived in Iowa all my life and am saddened and appalled to see the decline in the quality of our water. I grew up on a farm but do not believe that farmers and agribusiness people have the right to pollute our water with toxic chemicals and animal manure. I think that mandatory standards need to be implemented to stop the current pollution that is destroying the quality of our water. EVERYONE in Iowa has rights and the right to clean water is basic and critically important. Please stand up for lowans who want clean water!!!!

Mary Kirkpatrick
patchworkmaryj@msn.com
431 Elmridge Ave
Iowa City, Iowa 52245

COMMENTER 84: David Digby, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Clean Water

1 message

David Digby <info@email.actionnetwork.org>
Reply-To: adavid1922@hotmail.com
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 20, 2019 at 7:35 PM

Dan Kendall,

Dear Mr. Kendall,
I deeply appreciate both the work that you do and the magnitude of that work. I'd be preaching to the choir to point out that the preservation and protection of our natural resources are paramount to our wellbeing in this state and nation. As one who, this year, sold his little sailboat because the algae bloom is so toxic at Big Creek and who watches with dismay the degradation of the waters at Lake Red Rock where I now sail. I point this out, not that it is significant in light of the CAFO's and agricultural runoff and other more serious issues facing the state. I encourage you to pursue your mission with all the vigor and determination you have at your disposal.

David Digby
adavid1922@hotmail.com
1922 Roosevelt Avenue
Ames, Iowa 50010

COMMENTS 85: Michael Farley, private citizen

Date Received: Dec 20, 2019, e-mail

Comment:

Clean Water for Iowa

1 message

Michael Farley <info@email.actionnetwork.org>
Reply-To: mikemaryjean@gmail.com
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 20, 2019 at 9:10 PM

Dan Kendall,

As a CCI member and a 60 year resident of Iowa, it is unacceptable that in a state SO dependent upon the health of our soil and waterways, that the DNR has essentially been AWOL in funding and enforcing and regulation soil and water pollution for the benefit of corporate AG. Change is coming. Let's get to work.

Michael Farley
mikemaryjean@gmail.com
3221 SW 33rd St.
Des Moines, Iowa 50321

COMMENTS 86: Jill Campbell, private citizen

Date Received: Dec 21, 2019, e-mail

Comment:

Clean water is essential.

1 message

Jill Campbell <jacrn1992@gmai.com>
Reply-To: jacrn1992@gmai.com
To: daniel.kendall@dnr.iowa.gov

Sat, Dec 21, 2019 at 6:43 AM

Dan Kendall,

The human body is dependent on an even amount of hydration daily. When dehydrated, the human body works less efficiently. As a nurse, mother, grandmother, I am constantly pushing my clients and family to drink their water. How insane is it that what I am pushing as a factor for overall health is actually poisoned or tainted with chemicals or harmful bacteria. The outdoor activities of summer usually include visiting our lakes or rivers. To view this as a dangerous exposure to my special loved ones, makes no sense either. Water is fundamental to our lives. Without it we will perish. There is no substitute. I beg you to consider the position you are in as a lifeline. Do your best Mr Kendall to insure we do not lose our essential water. We are depending on you.

Jill Campbell
jacrn1992@gmai.com
4804 Hillcrest Drive
Pleasant Hill, Iowa 50327

COMMENTS 87: Gail Turner, private citizen

Date Received: Dec 21, 2019, e-mail

Comment:

Iowa's impaired waterways

1 message

Gail Turner <thepetpal@gmail.com>

Sat, Dec 21, 2019 at 9:41 AM

To: daniel.kendall@dnr.iowa.gov

Hi Daniel -

I just looked at the interactive map of Iowa's impaired waterways and my jaw dropped. I knew our waterways were in bad shape but didn't realize just how pervasive the problem is.

I live in Polk City in large part because of the outdoor recreation opportunities nearby. It's been many years since I've been willing to dip a toe into either Saylorville or Big Creek. What a shame. I want to urge the DNR to make cleaning up our waterways a priority. The profit desires of industrial agriculture should not be prioritized above the health of the people that live in our beautiful state.

I urge the DNR to do everything possible to rectify this problem so waters are able to be removed from the list, not added to it!

Thank you,

Gail Turner

1010 Cardinal Dr

Polk City IA 50226

--

COMMENTS 88: Roger and Dorie Bollman, private citizens

Date Received: Dec 21, 2019, e-mail

Comment:

Impaired Waterway Comments.

1 message

Dorie Bollman <rogerdorie@netel.net>

Sat, Dec 21, 2019 at 10:58 AM

To: daniel.kendall@dnr.iowa.gov

Merry Christmas Dan. Wishing you and yours a great holiday season.

Regarding the list of impaired waterways out for current comment. We live in the small unincorporated village of Volney, situated on the Yellow River in Allamakee County.. I note that most of the streams that feed into the Yellow River, as well as the Yellow River itself, are shown as impaired. I have canoed, kayaked and trout fished on the Yellow River and it's tributary stream Hickory Creek since my teen years 1960's and have personally seen the ups and downs of environmental impact to these streams over the decades. From roadside dumping along the stream bank, to blatant farm manure management issues and stream bank erosion. Things have improved over the years, but still need a more immediate and pro active approach to getting these streams, as well as others in the Driftless Area, to the quality they deserve as Iowa's premier trout fishing waters.

I would encourage and support progressive efforts to better to control proliferation of factory farms in the Driftless Area, as well as better control of manure management programs, particularly those associated with factory farms.

I remember drinking directly from fresh water springs in the area as a teenager in the early 1960's, without a thought to possible contamination. No longer. Even our home well water sources in the area, that primarily tap the Jordan aquifer, are often contaminated and unfit for consumption without chlorination, or the expensive process of drilling new wells to an even deeper water source. All as a result of long term agricultural practices that have culminated in "fouling our own nest".

So — obviously, there is more work and continued public education ahead of us to eventually bring our streams into an acceptable level of water quality. Lets keep working to incrementally improve the current poor status of our waterways!!

Thanks for the opportunity to comment on a issue of such importance to our area and its rural residents.

Sincerely,

Roger and Dorie Bollman
405 Big Foot Road
Monona, Iowa 52159

COMMENTS 89: Michael Koch, private citizen

Date Received: Dec 21, 2019, e-mail

Comment:

We need cleaner water
1 message

Michael Koch <info@email.actionnetwork.org> Sat, Dec 21, 2019 at 11:33 AM
Reply-To: mwkpar@gmail.com
To: daniel.kendall@dnr.iowa.gov

Dan Kendall,

Please please put legislation in place to cleanup our water in Iowa. Do this for the health and well being of our community and especially for our children.

Thank You.

Michael Koch
mwkpar@gmail.com
1001 South Park St.
Fairfield , Iowa 52556

COMMENTS 90: Don Langstaff, private citizen

Date Received: Dec 24, 2019, e-mail

Comment:

Water quality
1 message

Don Langstaff <donlangstaff@gmail.com> Tue, Dec 24, 2019 at 12:36 PM
To: daniel.kendall@dnr.iowa.gov

Dear Sir,

Please protect Lake Darling so that we can swim in it. We appear to be in danger of losing it again.

Respectfully yours,
Don Langstaff

COMMENTS 91: Jim Trepka, private citizen

Date Received: Dec 25, 2019, e-mail

Comment:

Iowa's Section 303(d) Impaired Waters Listings: Comments

1 message

Jim Trepka <jim_trepka@msn.com>

Wed, Dec 25, 2019 at 8:27 AM

To: "daniel.kendall@dnr.iowa.gov" <daniel.kendall@dnr.iowa.gov>

The state of Iowa needs to develop a comprehensive plan to deal with its impaired waters. It is appalling that the interactive map of impaired waters shows that every county (or almost every county) in the state has at least one impaired waterway and most counties have several. Some of these impaired waterways go through high population areas. Furthermore, 35 of 39 state beaches are on impaired waterway list. In addition, some of the prime recreational rivers for canoeing such as the Wapsipinicon and the Upper Iowa River are on the list. Clearly the state has done an inadequate job of protecting public lands and waters for the citizens of Iowa.

Jim Trepka
242 Highland Drive
Iowa City, IA 52246

COMMENTS 92: Julie Fischer, private citizen

Date Received: Dec 26, 2019, e-mail

Comment:

Impaired waterways

1 message

Julie Fischer <piscatrix@gmail.com>

Thu, Dec 26, 2019 at 10:47 AM

To: daniel.kendall@dnr.iowa.gov

Dear Mr. Kendall,

We are losing tons of fertile soil every spring. We live beside the Upper Iowa which runs very clear in winter. But the moment the spring rains come--and they are increasing in frequency and intensity--the Upper Iowa is moving mud, the resource wealth of our state lost to the Mississippi.

We have a cow-calf operation near the Trout Hatchery that drains right into a tributary to the Upper Iowa and the cows move freely through that stream. That operation needs to be changed.

I believe Minnesota is now mandating 30 foot wide, deep- rooted prairie grass strips along its stream banks. We should do that too. Those strips capture the rainfall, filter it, and help channel it to the aquifers. They prevent erosion and contamination. Farmers and other land holders should be given assistance for implementing and maintaining these structures.

I love to paddle the Upper Iowa and other streams in our state. I am also an avid fisherwoman, but I want to stay healthy if I fall into the stream, and I want to eat the fish I catch. I support the 3/8 cent sales tax that would be earmarked recreation and for such projects. I also support a moratorium on any further CAFOs. Toxic livestock sewage needs to be treated or biodigested to make energy. Too much of it runs off the land.

Thank you for hearing my concerns. I hope to enjoy the natural beauty of Iowa and see it improve. With your help, I know it can!

Sincerely yours,
Julie Fischer

COMMENTER 93: Rachel and Tim Ng, private citizens

Date Received: Dec 26, 2019, e-mail

Comment:

public comments, Iowa Impaired Waters

1 message

Rachel K. Ng <rachelkunze@gmail.com>
To: daniel.kendall@dnr.iowa.gov

Thu, Dec 26, 2019 at 3:53 PM

Mr. Kendall,

Hello, my husband and I are writing in support of John Norwood's comments and suggestions concerning Iowa's impaired waters. We agree that Iowa agricultural practices should be modernized, especially stressing quality, diversification, and sustainability. How Iowa deals with water and environmental issues over the next few decades will be the deciding factor in our decision to keep our family in Des Moines (as well as our local business), or to move to another part of the country.

We hope Iowa will invest in our future health and profitability now with these systematic improvements.

Thank you,
Rachel and Tim Ng

COMMENTER 94: Jana West, private citizen

Date Received: Dec 27, 2019, e-mail

Comment:

Urgent Iowa waterways

1 message

Jana West <janalwest@msn.com>
To: "daniel.kendall@dnr.iowa.gov" <daniel.kendall@dnr.iowa.gov>

Fri, Dec 27, 2019 at 7:32 AM

I am on the DNR mailing list and am personally very concerned about how common water issues caused by agricultural malfunction are. My belief is our impaired waterways need to be addressed immediately.

I have read recommendations by John Norwood, a Polk County Soil and Water Commissioner and believe his ideas should be given serious consideration.

"first, modernizing the vision for our state's agricultural "machine," and second, looking at how to support that new vision through systems, conservation infrastructure, policies and practices, and local, regional, national, or international markets.
.... we need a new ag vision which stresses quality over quantity, profitability over production, diversification over concentration, sustainability over "unavoidable" depletion/leakage, and collective action over "everyone on their own."

I will be following this story and hope you will implement meaningful changes for the good of all Iowans as well as those we share water sources with.

Sincerely,
Jana West
Ankeny, Iowa

I will be following this
Sent from my iPhone

COMMENTER 95: Niki Hinton, private citizen

Date Received: Dec 27, 2019, e-mail

Comment:

Public comment for Iowa's impaired water ways

1 message

Niki Hinton <hinton.niki@gmail.com>
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 27, 2019 at 8:41 AM

Hello,

I am the daughter of a crop duster and there is an unbelievable amount of chemicals, including ones that have been shown to cause cancer and kill bees, being poured on our state's soil in the name of fewer weeds and bugs and higher yields. This is not sustainable.

My family and I spend time at Big Creek Beach in the warmer months and at times have seen HUNDREDS if not thousands of dead minnows washing up on the shore. We have also been told by our friends at the DNR to shower after swimming in any of Iowa's waterways.

Our lax laws when it comes to polluting the very waterways that we depend on for clean drinking water and recreation are causing long-term and very probably permanent damage to our waterways and ecosystem.

The state needs to ban round-up and other known carcinogens, as well as limit the amount of chemicals that can be poured into our soil each year. We need both farmers and legislators who are educated on the issues at hand and who can work together to find healthy and sustainable solutions.

Niki Hinton
Former Humboldt County Resident
Current Polk County Resident

COMMENTER 96: Sharon Johnson, private citizen

Date Received: Dec 27, 2019, e-mail

Comment:

Iowa's Polluted Waters are a Disgrace

1 message

sharon johnson <info@email.actionnetwork.org>
Reply-To: sharonjohnson62@hotmail.com
To: daniel.kendall@dnr.iowa.gov

Fri, Dec 27, 2019 at 7:07 PM

Dan Kendall,

The state of Iowa is failing to protect our health and our environment by allowing over 650 polluted waterways to exist, by allowing over 10,000 big factory farms to continue to expand their size and their numbers, thus increasing the number of polluted waterways every year. It's important to me because I know my health is jeopardized. Iowa is one of the top states in the country for cancer diagnoses. Please connect the dots and give us access to CLEAN water. CLEAN water is LIFE and a HUMAN RIGHT. We need stronger and enforceable laws regarding Iowa's water crisis.

sharon johnson
sharonjohnson62@hotmail.com
6501 Washington ave
Windsor Heights, Iowa 50324

COMMENTER 97: Linda Quinn, private citizen

Date Received: Dec 28, 2019, e-mail

Comment:

Clean Water for Iowa

1 message

Linda Quinn <Quinnhenry@msn.com>
Reply-To: Quinnhenry@msn.com
To: daniel.kendall@dnr.iowa.gov

Sat, Dec 28, 2019 at 11:00 AM

Dan Kendall,

The new DNR report on 1,110 impaired waterways is crazy-bad! It's a crisis! Isn't it time we face this environmental crisis here in Iowa? Let's make connections between this sorry state of bad water to the part that industrial ag plays, with its heavy reliance on chemicals, CAFOs and tiling. It's time we stop exploiting our environment for the sake of profits for a few.

Can you at the DNR play a part in protecting the environment for the next generation of Iowans? Access to clean water is important to me, my family, and my community. Our concerns arise from closed beaches and contaminated private well-water. Concerns about the higher and higher cost for removing nitrates from municipal water. And concern for loss of recreational opportunities from the disappearance of wildlife habitats. Aren't we in Iowa a part of the global decline in pollinators? In the loss of 3 billion birds in North America?

Protecting our resources IS what the public wants. Evidenced by the 2010 vote by 62.6% Iowans, saying yes to the Iowa Outdoor Recreation Trust Fund Amendment.

Can you at the DNR take an active role in advocating for a solution to the water and environmental crisis we have here in Iowa?

Linda Quinn
Quinnhenry@msn.com
2949 Creighton kSt
Iowa City, Iowa 52245

COMMENTER 98: Ellen Hansen, private citizen

Date Received: Dec 28, 2019, e-mail

Comment:

Iowa water comments

1 message

Ellen Hansen <nelleelle1@msn.com>
To: "daniel.kendall@dnr.iowa.gov" <daniel.kendall@dnr.iowa.gov>

Sat, Dec 28, 2019 at 2:27 PM

I am not a scientist. My comments (due today) are simple

- 1) I support whatever your staff scientists recommend
- 2) care of waterways should be Iowa's very highest good

COMMENTS 99: Jeff Inman, private citizen

Date Received: Dec 28, 2019, e-mail

Comment:

Iowa's water quality

1 message

Jeff Inman <jeff.inman@drake.edu>

Sat, Dec 28, 2019 at 4:24 PM

To: daniel.kendall@dnr.iowa.gov

When I was a kid my family would spend summer weekends on Lake Rathbun, boating, fishing and swimming. In 2019 Lake Rathbun suffered a major algae bloom that shut down significant parts of the lake and its beaches. I can no longer take my kids there safely. And this is happening all over the state. All Iowans deserve clean water. No one should have to fear for their safety because of a small number of polluters. It's time to regulate Iowa's waterways and ensure that we all can enjoy our state and its bounty.

--

Jeff Inman
Associate Professor
School of Journalism and Mass Communication
Drake University
jeff.inman@drake.edu
515-491-9483

COMMENTS 100: Richard Floss and Beverly Clark Floss, private citizens

Date Received: Dec 28, 2019, e-mail

Comment:


DNR comment on impaired waters

1 message

Beverly Clark Floss <bevclark50028@icloud.com>
To: daniel.kendall@dnr.iowa.gov

Sat, Dec 28, 2019 at 4:37 PM

We are submitting this comment as farmers.

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103K

November 28, 2019

Dear Mr. Kendall:

We are Jasper County farmers writing in support of the comments submitted by John Norwood, Polk County Soil and Water Commissioner.

Norwood approaches the issues of water impairment from a systems analysis viewpoint. He supports looking at impaired water from a drainage district viewpoint, addressing a solution set for the entire system rather than piecemeal farm-by-farm approach. This seems to be a sound response.

Norwood also supports additional monies for conversion of 500,000 acres "to produce environmental services instead of crops." We do need to think of building "green wetland infrastructure" that we value in much the same way we value our farm road systems. This will necessitate new ways of thinking and speaking. As noted in Norwood's comment, recognizing that making changes of the magnitude needed will take time, probably more time than we really have on an individual voluntary basis. Our Ag schools and Ag Extension can serve as strong education providers for this effort in shifting majority focus from crop production to ecological protection. Our Ag community will need strong incentives to make the necessary operational changes.

We heartily agree with the need for a broader vision of agriculture than the corn-bean monopoly. This broader vision would require much investment, yes, but can be a door opener to "new jobs, new services and new economic development." All of this would be a plus for enhancing our rural communities and, given the current issues with air, soil, and water pollution, such "green" programs would surely improve the quality of our local communities. There is no question that to create these new Ag visions will take a public-private partnership with farmers willing to be bold in their community leadership.

Richard Floss and Beverly Clark Floss
7778 Hwy F24 W
Baxter, Ia, 50028

COMMENTER 101: Ellis and Winifred Standing, private citizen

Date Received: Dec 28, 2019, e-mail

Comment:

Clean water

1 message

Ellis and Winifred Standing <winstanding@wildblue.net>
Reply-To: winstanding@wildblue.net
To: daniel.kendall@dnr.iowa.gov

Sat, Dec 28, 2019 at 9:39 PM

Dan Kendall,

Dear Mr. Kendall,

We appeal to you for action on cleaning Iowa's impaired waterways. Pure water is a basic human need. It is shameful for our state to be in such bad condition. Please put this issue at the top of your New Year's Resolution list.

Ellis and Winifred Standing
winstanding@wildblue.net
3520 J Court
Earlham, Iowa 50072

COMMENTER 102: Mike Donovan, private citizen

Date Received: Dec 29, 2019, e-mail

Comment:

Iowa's water quality

1 message

Mike Donovan <m.gloedonovan@gmail.com>
To: "daniel.kendall@dnr.iowa.gov" <daniel.kendall@dnr.iowa.gov>

Sun, Dec 29, 2019 at 12:07 AM

Dear Mr. Kendall,
I'm writing to to express my thoughts about the quality of Iowa's waterways.

After graduating from Iowa State University in the early nineties, my wife and I chose to stay here in Iowa while our closest friends moved to Colorado, and throughout the Pacific Northwest. We chose to stay primarily for the cost of living and the job opportunities.

Our friends left the state to live where they could enjoy the natural splendor and beauty of the natural resources those states cherish and preserve for all to enjoy. I spent the first 10 years of life growing up in Wisconsin, a state that does also cherish and protect their resources. Those ideals were instilled in me at an early age. Take care of your environment so those who come after you can enjoy it as well.

As a parent now, I find myself apologizing to my friends and to my children for choosing to live in a state where you have to be cautious about what bodies of water you swim in, or what waterways may be safe enough to eat fish from.

I find this painful and sad.
Is this the legacy we want to leave to our children?
I think not.
Sincerely,
Mike Donovan