

**PUBLIC PARTICIPATION RESPONSIVENESS SUMMARY  
FOR IOWA'S 2020  
SECTION 303(d) LIST OF IMPAIRED WATERS**

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

**February 8, 2021**

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## Introduction:

The following constitutes a summary of the Iowa Department of Natural Resources' (DNR) responses to the comments received regarding the draft 2020 Section 303(d) list of Impaired Waters as developed by the DNR. Notice of availability of the draft 2020 list was released for public review and comments on December 1, 2020 following a video press conference. A recording of the press conference video call can be provided upon request. In addition, notice of the availability of the list was posted on the DNR's Twitter feed on December 1, 2020 (<https://twitter.com/iowadnr/status/1333903710045540353>) and in a DNR news release on December 1, 2020 (<https://www.iowadnr.gov/About-DNR/DNR-News-Releases/ArticleID/3309/DNR-releases-latest-draft-of-303d-impaired-waters-list>). Additional materials for the draft 2020 list were available on the DNR's "impaired waters" website (<https://programs.iowadnr.gov/adbnnet/Assessments/Summary/2020>). Public comments were accepted from December 1, 2020 through January 1, 2021. As distributed for public comment, DNR's draft 2020 Section 303(d) list included 586 water segments with a total of 775 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 DNR's final 2020 Integrated Report (IR) and Impaired Waters List (<https://programs.iowadnr.gov/adbnnet/Assessments/Summary/2020>).

## Changes made to Iowa's final 2020 Integrated Report:

There were changes made to three draft assessments following the public comment period. Based on information provided, the final assessments were modified according to IR methodology. Table 1 details the changes that were made to the DNR's final 2020 IR.

Table 1. Changes to the DNR's final 2020 Integrated Report.

ADBNet Code	Waterbody Name	Designated Use	Draft IR Category	Final IR Category	Rationale
<a href="#">IA 06-BSR-6609</a>	West Rat Creek	Aquatic Life	5b	4d	Fish kill penalty paid.
<a href="#">IA 04-UDM-6625</a>	UT* to UT to Des Moines River	Aquatic Life	5b	4d	Fish kill penalty paid.
<a href="#">IA 04-UDM-6625</a>	UT to UT to Des Moines River	General Uses	3a	3b	General Use WQ** violations.
*UT = Unnamed Tributary					
**WQ = water quality					

**Responses to comments received on the draft 2020 Impaired Waters List:**

The DNR acknowledges and thanks all for their comments on the draft 2020 Impaired Waters List.

**COMMENTER 1: Michael Schmidt, Staff Attorney, Iowa Environmental Council**

**Date Received:** Dec 15, 2020, e-mail

**Comment:**

**Comments on Impaired Waters List**

1 message

**Michael Schmidt** <schmidt@iaenvironment.org>

Tue, Dec 15, 2020 at 11:18 AM

To: "IRcomment@dnr.iowa.gov" <IRcomment@dnr.iowa.gov>

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

Dear Water Quality Monitoring and Assessment Section:

Attached please find comments from the Iowa Environmental Council on the draft 2020 list of the section 303(d) impaired waters. Thank you for your consideration of our comments.

Please let us know if you have any questions or would like to discuss our comments.

Sincerely,

Michael R. Schmidt



Michael R. Schmidt | Staff Attorney

515-244-1194 x 211 | [schmidt@iaenvironment.org](mailto:schmidt@iaenvironment.org)

Iowa Environmental Council

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IEC comments - 2020 303d draft list.pdf  
653K



**Iowa  
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December 15, 2020

Iowa Department of Natural Resources  
Attn: IR Comments  
Wallace State Office Building  
502 East 9<sup>th</sup> Street  
Des Moines, IA 50319  
Email: [IRcomment@dnr.iowa.gov](mailto:IRcomment@dnr.iowa.gov)

**RE: Draft 2020 List of Impaired Waters**

Dear Water Quality Monitoring and Assessment Section:

The Iowa Environmental Council (Council or IEC) offers the following comments on the draft 2020 list of the Section 303(d) impaired waters. These comments represent the views of the Iowa Environmental Council, an alliance of 80 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 2020 impaired waters list:

- **A high proportion of assessed waters are impaired.**  
Although the 2020 list has fewer impaired segments needing a total maximum daily load (TMDL) than the 2018 list (750, down from 767), the proportion of assessed waters listed as impaired rose from 54% to 58%. 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 develop and implement TMDLs to improve the waters enough for them to be considered for removal. Instead, state leadership expects Iowans to accept that more than half the waters in Iowa 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 significantly reduce the number of impairments.**
- **Inclusion of Category 3 segments in the assessment misleads the public.**  
Category 3 - Waters in Need of Further Investigation (WINOFI) - is used by DNR to categorize waters for which there is insufficient data to determine whether designated uses are being met. These waters are not determined to be either supporting or not supporting of their designated uses. However, DNR includes them in the total count of waters assessed. These waters are in fact not assessed by definition – the Category



3 designation is for waters that are unable to be assessed for impairment due to insufficient data. Therefore, it is misleading to include these waters in the total number of waters that have been assessed. In the 2020 draft list, 266 segments are categorized as WINOFI. If those segments are excluded from the assessment, only 1,034 segments were actually assessed by DNR and determined to be supporting or not supporting. Of those segments, more than 72% are impaired. **IEC calls on DNR to exclude Category 3 waters from the impaired waters assessment because the waters remain unassessed. Inclusion of Category 3 misleads the public about the number of waters assessed and the percentage of waters determined to be impaired.**

- **A high proportion the state's A1 primary recreational waters are impaired.** Of Iowa's waters that have been assessed for A1 recreational use, 88% (579 of 658) are impaired. Public lands and waters are owned by the people of Iowa under the care of the state. Iowans are not getting the full benefits of the state's primary recreational waters due to poor water quality. The state has done an inadequate job of protecting public lands and waters for public recreational use. **The Council calls on DNR to prioritize TMDL completion for Iowa's recreational waters and improve Iowa's recreational water quality for the benefit of Iowans.**
- **Iowa still does not have numeric nutrient criteria or a microcystin standard.** The EPA has issued a recommendation for a microcystin water quality standard that would protect recreational users and has released draft criteria for numeric nutrient criteria. **IEC calls on the state to adopt numeric nutrient and microcystin criteria prior to the development of the 2022 impaired waters list.** These criteria are necessary to understand the condition of Iowa's waters.
- **The state's monitoring program is not rigorous and does not allow for comparison over time.** When the impaired waters list is released, DNR staff takes the position that the results cannot be interpreted to give Iowans an understanding of Iowa's water quality. This is due at least partially to using data that is collected haphazardly from all available sources instead of being collected through a standardized, rigorous monitoring scheme that allows comparison over time.<sup>1</sup> If the state had a common monitoring plan that used a watershed approach to collect data and assess water quality, the impaired waters list would be a much more useful tool for actually understanding the state's water quality and progress toward meeting water quality standards. **IEC urges the DNR to develop a standardized monitoring plan using the watershed approach that is scientifically rigorous, allows interpretation of results, and is useful to the public.** Such a plan might resemble Minnesota's watershed lake and stream monitoring program, which fully assesses watersheds on a 10-year cycle.
- **The release of the draft list is delayed.**

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<sup>1</sup> Iowa DNR. "Methodology for Iowa's 2020 Water Quality Assessment, Listing, and Reporting Pursuant to Sections 305(b) and 303(d) of the Federal Clean Water Act." 9 Nov. 2020. Pg. 11-12.

DNR released the 2020 draft impaired waters list and integrated report on December 1, 2020. This is eight months after the deadline for the list and report to be submitted to EPA – on April 1 of even numbered years.<sup>2</sup> While this is a significantly faster turnaround than the 2018 list, which was released nineteen months late, the DNR is still behind on meeting statutory and regulatory deadlines. It is also noticeable that although the list was released eleven months faster than the previous list, more than 100 fewer segments were assessed. **The Council calls on the state to provide enough resources to DNR to meet its obligation to submit the 303(d) list and integrated report by the deadlines in federal law.**

#### COMMENTS ON IOWA'S RECREATIONAL LAKES

The Iowa Environmental Council completed detailed reviews of the DNR assessment information for state park recreational beaches. Based on our review, IEC has identified several waterbodies for which the state should do more to protect and improve our water quality.

**Many of the state's premier recreational lakes continue to be impaired due to indicator bacteria.**

The following table lists when state park lakes were added to the impaired waters list for indicator bacteria (*E. coli*) and when a TMDL was completed, if any.

Lake	Cycle Added	TMDL completed	TMDL Priority
Backbone	2004	N/A	Tier II
Beeds	2002	2006	N/A
Keomah	2008	N/A	Tier II
Lower Pine	2006	N/A	Tier II
Macbride	2006	N/A	Tier I
West Okoboji (06-LSR-2066)	2006	N/A	Tier II

These six lakes continue to experience chronic *E. coli* contamination, resulting in swim advisories during the summer recreation season that turn visitors away from safely recreating and enjoying Iowa's state parks. Lake Macbride is considered a Tier I priority for TMDL completion due to the impairment's high social impact and relatively low complexity or cost for development.<sup>3</sup> Yet more than a decade later, the state still has not completed a TMDL for indicator bacteria for the lake.

DNR added Backbone Lake to the impaired waters list in 2004. Backbone was Iowa's first state park, dedicated by the state in 1920. It has many unique features including limestone cliffs and Civilian Conservation Corps buildings constructed in the 1930s. In a year where Iowa celebrated one hundred years of state parks, it is a disgrace that water quality in Backbone Lake, Iowa's flagship park, has been so poor for decades, the beach

<sup>2</sup> 33 U.S.C. § 1315(b)(1); 40 C.F.R. § 130.7(d).

<sup>3</sup> Iowa DNR. "Long-term vision for assessment, restoration, and protection under the Clean Water Act Section 303(d) program." Oct. 2015. Pg. 4-5.

is under swim advisories more than 75% of the recreational season every summer, and there is no TMDL to address this chronic impairment.

Beeds Lake is another particularly unfortunate example of the state's lack of progress toward meaningfully protecting and improving recreational water quality. Although DNR added Beeds Lake to the impaired waters list in 2002 and completed a TMDL in 2006, the lake continues to be plagued by *E. coli* contamination more than a decade later. For the 2014-2018 reporting period covered by the 2020 assessment, Beeds Lake was under swim advisories for at least half of every summer recreation season.

Number of Weeks under <i>E. coli</i> Swim Advisory Out of 15 or 16 Week Recreational Season (exceeding single sample 235 MPN/100 mL or 5-week geometric mean 126 MPN/100 mL) <sup>4</sup>					
	2014	2015	2016	2017	2018
Backbone	12	14	14	13	14
Beeds	10	9	13	7	8
Keomah	3	0	4	3	6
Lower Pine	2	8	9	6	9
Macbride	1	7	5	4	11
West Okoboji (Emerson Bay Beach)	1	7	7	6	7

**We urge the DNR to not only complete TMDLs for these lakes, but for the state to provide adequate resources to implement the TMDLs, improve the water quality of these lakes, and remove them from the impaired waters list.**

Thank you for the opportunity to comment on the draft 2020 impaired waters list. If you have questions or we can clarify these comments further, please feel free to call.

Sincerely,

/s/ Michael R. Schmidt

Michael R. Schmidt  
Staff Attorney  
Iowa Environmental Council

/s/ Alicia Vasto

Alicia Vasto  
Water Policy and Advocacy Specialist  
Iowa Environmental Council

<sup>4</sup> Iowa DNR. Beach Monitoring Program. Data available at <https://programs.iowadnr.gov/aquia/>.

### **DNR Response:**

The DNR thanks the Iowa Environmental Council for their general and specific comments on the draft 2020 Impaired Waters List and IR methodology.

### **Monitoring / Data Analysis**

With respect to the general comments, the DNR continues to support standardized and robust ambient stream monitoring, ambient lake monitoring, targeted and random stream biological sampling, and beach human health surveillance programs. In addition to the data collected as a part of Iowa's monitoring programs, the DNR utilizes data from external agencies and sources to complete Iowa's Impaired Waters List. The DNR routinely collaborates with many of these external agencies to coalign the needs of the various sampling programs.

The DNR houses the majority of its water monitoring data in its public facing water quality database AQUa (<https://programs.iowadnr.gov/aqua/>). The DNR does not recommend using the Impaired Waters List for trend analysis due to its threshold-based analysis of the site specific data. AQUa contains an abundance of data (significantly greater in quantity relative to many states' data) to use in performing long-term trend analysis. Additionally, the AQUa website contains graphing tools to look at trends for all analytes at each sampling location. In addition to the ambient stream and lakes monitoring programs, the DNR also began collecting water quality information at additional lakes (starting in 2018) on a rotational basis. Additional stream water quality data collection was scheduled to start in 2020; however, the start was pushed back to 2021 due to the COVID-19 pandemic. Please be advised, it takes 3 to 5 years for sufficient data to be collected at new sites prior to inclusion in the IR, and an additional 2 years for the first monitored assessments to be completed. Prior to that time, the additional monitoring data will be assessed as evaluated, and potential impairments will be placed on the Waters in Need of Further Investigation (WINOFI) list.

### **WINOFI**

The development and inclusion of the Category 3b WINOFI list is required by Iowa Code, Section 455B.195, sub section 1f (<https://www.legis.iowa.gov/docs/code/455B.195.pdf>). Subsection 1f reads:

"When evaluating the waters of the state, the department shall develop and maintain three separate listings including a section 303(d) list, a section 305(b) report, and a listing for which further investigative monitoring is necessary. The section 305(b) report shall be a summary of all potential impairments for which credible data is not required. If credible data is not required for a section 305(b) report, the placement of a water of the state on any section 305(b) report alone is not sufficient evidence for the water of the state's placement on any section 303(d) list. When developing a section 303(d) list, the department is not required to use all data, but the department shall assemble and evaluate all existing and readily available water quality-related data and information. The department shall provide documentation to the regional administrator of the federal environmental protection agency to support the state's determination to list or not to list its waters."

While the United States Environmental Protection Agency (US EPA) places this type of assessment in Category 3 "Not Assessed", it is still an assessment of the existing, readily available data for the segment that places it in an Iowa category of potential impairment and therefore should be included in the summary page. Thus, the DNR does not find the inclusion of Category 3b segments in the assessment total to be misleading, and the inclusion of these segments is supported by Iowa Code.

### **Numeric Nutrient Criteria / Microcystin Criteria**

With respect to the comment on adoption of numeric nutrient criteria or a microcystin standard prior to the development of the 2022 impaired waters list, the DNR continues to participate in the development of scientifically defensible criteria. Progress to date includes working with US EPA to use national and Iowa lake data to estimate chlorophyll-a and microcystin relationships. Preliminary results have shown that combining state and national data can improve the performance of US EPA's 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). US EPA released the draft lake numeric nutrient criteria document that incorporates this research, in addition to other published research, in May of 2020 for public comment. The DNR submitted comments to the US EPA during the comment period. Currently, the DNR is waiting for the US EPA to finalize the criteria and release the draft technical support document for lake numeric nutrient criteria for public comment. Once the lake numeric nutrient criteria and the technical support documents have been finalized, the DNR will review the recommended criteria to decide on further future action on the subject.

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 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. In early 2020, after detailed review of the criteria and underlying science the DNR and Iowa Department of Public Health agreed to utilize the microcystin threshold value in its beach monitoring program for the purpose of posting swimming advisories. The DNR is continuing to review the recommended criteria to decide on further future action on the subject.

#### **IR Submission Date**

With the current staffing resources and a desire to include all available data for the current assessment cycle, the DNR applied best efforts to provide the 2020 IR as early as possible. The DNR, however, plans to submit the 2022 303(d), 305(b), and 314 Integrated Report by April 1 of 2022.

#### **Beach TMDLs**

The DNR submitted the first group of lakes for the Statewide Beach Bacteria TMDL in 2020, receiving US EPA approval on August 6, 2020. The TMDL document outlines the approach the DNR will consider for all bacteria impaired beaches in the state if the data analysis reveals consistency with the fingerprint observed in the original three study lakes. The DNR plans to release the second set of lakes for the statewide TMDL in 2021, including Lake Macbride. Other beaches, including Lake Keomah and Lower Pine Lake, have initial information gathered but require more data to make a final determination. As resources allow, DNR plans to evaluate all bacteria impaired beaches, and if the data analysis fits with the Statewide Beach Bacteria approach, TMDLs for those beaches will be added to the document.

Please note that due to the complexity of the statewide approach, all beach bacteria impairments should be TMDL Tier (or priority group) II, not Tier I, and the DNR changed the status of Lake Macbride to reflect that. For a full breakdown of how the impaired waters are sorted into priority tiers, please see pages 30-33 in the 2020 IR Methodology document found on the publications page in Iowa's Water Quality Assessment Database ADBNET (<https://programs.iowadnr.gov/adbnnet/Docs/Publications>).

#### **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](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 2: Roger L. White, private citizen**

**Date Received:** Dec 15, 2020, e-mail

**Comment:**

**2020 305(b) Assessment Summary**  
1 message

**Roger White** <rwhite@cfu.net>  
To: IRcomment@dnr.iowa.gov

Tue, Dec 15, 2020 at 3:11 PM

I wish to respond to the above Draft Report. The release of this report seems to be delayed, and withholding of information from the public ends up being way to keep the public ignorant of the reality of our impaired waters. We have far too many impaired bodies of water in Iowa. It is regrettable that such a large portion of the main recreational bodies of water are still so badly impaired and there seems to be no concrete plan for quantifiable improvements. I believe this a deficiency in this draft report. Other deficiencies of the report are what I consider to be inadequate sampling and testing as well misleading reporting related to the assessments. Finally, the lack of clear goals or benchmarks and observable criteria leading to correction makes these assessments suspect and faulty. Until there are firm and improving criteria, a specific timeline, and until there are some teeth for enforcement of the goals or benchmarks, the state will struggle with an embarrassing number of impaired waters. I hope this draft is markedly improved before it is finalized and submitted.

Roger L. White  
rwhite@cfu.net  
2303 Greenwood Ave  
Cedar Falls, IA 50613-4519

**DNR Response:**

The DNR thanks Roger White for commenting on the draft 2020 Impaired Waters List and IR methodology. The DNR interprets the due dates issued in the memorandums containing information concerning the submittal of the Clean Water Act Sections 303(d), 305(b), and 314 Integrated Reporting and Listing Decisions, released by the US EPA, to be a recommendation. Please see the **IR Submission Date** section in the response to Commenter 1 for further discussion on the IR submittal dates.



**COMMENTER 3: Dan Haug, Watershed Educator, Prairie Rivers of Iowa**

**Date Received:** Dec 17, 2020, e-mail

**Comment:**

**Data to include in assessments for two waters in Draft 2020 list**  
1 message

Dan Haug <dhaug@prrcd.org>  
To: IRcomment@dnr.iowa.gov

Thu, Dec 17, 2020 at 5:34 PM

Following our comments in the 2018 cycle, Squaw Creek (IA 03-SSK-954) and East Indian Creek (IA 03-SSK-947) were added to Waters in Need of Further Investigation and 2016 data was added to ADBNet. The attached lab reports and data summary from 2017 and 2018 recreational seasons would not change that designation for 2020 but should be included in the assessments for those water bodies.


E. coli samples were collected approximately biweekly during the recreational season by staff with the City of Ames and Story County Conservation, and processed by a certified lab, the City of Ames Water and Pollution Control Laboratory. 40/42 temporally independent samples exceeded the single sample maximum of 235 and all three geomeans exceeded 126 MPN/100mL indicating a severe impairment. In East Indian Creek, 39/42 temporally independent samples exceeded the single sample maximum of 235 and all three seasonal geomeans exceeded 126 MPN/100mL indicating a severe impairment.

We commend DNR for the hard work in preparing this assessment and completing TMDLs. The changes to ADBNet and the additional reporting categories make it easier to understand which uses have been assessed and are supported.

--


Dan Haug ♦ Watershed Educator


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---

**2 attachments**

 **Squaw Creek East Indian Creek summary.xlsx**  
14K

 **LabReports.zip**  
3657K

**DNR Response:**

The DNR thanks Prairie Rivers of Iowa for their comment on the Draft 2020 Impaired Waters list and IR methodology. We have reviewed the data supplied by Prairie Rivers and have incorporated the new data into the segments: Squaw Creek (IA 03-SSK-954) and Indian Creek (IA 03-SSK-947). This additional information did not change the status of the segments and they remained on the Waters in Need of Further Investigation (WINOFI) list for *E. coli*. The potential impairment will be listed as “evaluated” instead of “monitored” on the state’s WINOFI list because the data were collected and processed by a state certified laboratory, but without the other required quality controls in place as prescribed by the state’s Credible Data Law. Information about Iowa’s Credible Data Law can be found in Iowa Code, Section 455B.195 (<https://www.legis.iowa.gov/docs/code/455B.195.pdf>). Keeping these water bodies on the WINOFI list will allow the DNR to target new locations for sampling in the future as additional funding becomes available to expand the ambient stream monitoring program.



**COMMENTER 4: Gordon Garrison, private citizen**

**Date Received:** Dec 23, 2020, e-mail

**Comment:**

**Comments on 2020 impaired waters list**

1 message

gordon g <gordonb50us@yahoo.com>

Wed, Dec 23, 2020 at 1:29 PM

To: "IRcomment@dnr.iowa.gov" <ircomment@dnr.iowa.gov>

Attached are my comments regarding 2020 Impaired Waters List.

Also attached water testing results relating recorded discharges to the Tributary (creek) mentioned in my comments.

Also attached Administrative Consent Order NO. 2019-AFO-23

Submitted by:

Gordon Garrison

1386 340th Ave.

Estherville, Iowa 51334

Phone [REDACTED]

8 attachments

#### 2020 Impaired water list comments

In response to DNR request for public comments to the draft of Iowa 2020 Impaired Waters list, I am making the following comments regarding the listing titled Unnamed Tributary to Des Moines River, IA. 04-UDM-6625.

The origin point of Fish Kill event (ID 908) is not correctly located. The origin of the pesticide was a soybean field, located in the N ½ of sec. 31, Emmet Twp., Emmet County, Iowa, owned and operated by BWT Holdings III P (BWT), Incorporated in Iowa as a family farm corporation, with Bradley Freking listed as doing "day to day" managing.

The 2018 report, dated 8/6/2019, that covered the Fish Kill event incorrectly states no administrative action take. On May 15, 2017 an Administrative Consent Order #2017-WW-08 was issued to Hoppe Air Spray assessing a \$7500 penalty. Pilot claimed information provided him did not alert him to the presence of creek on the property.

As an Iowater Volunteer water monitor, I have been monitoring the water entering my property, located in S ½, Sec. 30, Emmet Twp. Emmet Co., Iowa, from the upstream property currently owned by BWT. That monitoring dates back to 2001.

My property is sensitive to water quality degradation, because of my efforts to restore "Prairie Pothole" Ecology and this was why I had an early interest in evaluating water quality at his location.

In 2014 BWT acquired ownership of farm directly upstream from my farm. They sold a small tract, in SW corner, to New Fashion Pork LLP (NFP). NFP who then constructed a 4400 head deep pit hog confinement on that lot in 2015. The permitting documents included acknowledging a 20+ year agreement from BWT to accept hog manure, from the NFP CAFO, to be applied to the property upstream from my farm. Also included in permitting documents was an easement agreement stating that NFP did not guarantee the quantity or quality of manure delivered.

Several problems exist with BWT disposal site and BWT-NFP management practices. The disposal field is located on the Des Moines Lobe, which is characterized by fracturing and sand and gravel in the glacial till. This field is classified, by NRCS, as Highly Erodible Land (HEL) and has a elevation change of about 80 feet from high point in SW corner to where the creek enters my property. I have lived on my farm since 1972 and observed that the HEL soils located in this area have a high ability to infiltrate rainfall. The disposal field had a random tile system was never modified from 1972 to the spring of 2017, when BWT installed a pattern tiling system. The random tiling system appeared to function at a high level making the need for the extensive pattern tile system questionable. The disposal field contains no depressions that trap water. The addition of closely spaced, about 60 foot spacing, pattern tiles adds multiple direct access points to the unnamed tributary (creek). NFP applies manure with a knifed in applicator, using 30" spacing, creating a narrow application zone of approximately 4 to 6 inches wide at each knife. Application rates are based on broadcast application, the actual application in application zone is 5 to 7 ½ times the stated broadcast rate. The CAFO building uses a design called deep pit, which houses animals directly over waste storage. The waste, urine and poop generated by hog, contains about 82% liquid. This production method, deep pit confinement, generates a wastes containing well over 90% liquid. The additional

dilution comes from wasted drinking water, water used to clean building interior and water added intentionally by CAFO operator. Injected liquid waste is the mechanism where by excessive nitrogen and phosphorous are reaching the creek. That is reason why waste management to prevent pollution always limits addition of extra water. In 2016, Cindy Martens of DNR Spencer Field office related to me that Jay Moore, representing NFP, claimed he added one foot of water to pit prior to start up. The DNR allowed this, even though water was added before any indication conditions would exist for frost heave of floor. That resulted in unnecessary dilution of the waste. The management decision to use the deep pit design apparently is based solely on economic consideration without any concern for environmental issues related to diluted waste disposal.

As an lowater volunteer water monitor, I developed a testing program, in April 2016, to better understand the implications of BWT-NFP management would have on my downstream property. The results of that testing indicated the BWT-NFP management is causing impairment of the creek. My plan was to conduct tests of creek water attributable to discharges from the tiles exiting the BWT waste disposal field. The test were to occur about once per month, unless additional testing seemed warranted. Since the burden of the expense of testing resides with me, I choose to limit testing to nitrogen and phosphorous. These two nutrients are responsible for eutrophication of downstream water. Samples were collected in sample bottles furnished by Iowa Hygienic Lab and samples were delivered to them in person within a short time of sampling. My samples have met lab protocol for delivery and storage as noted by Lab. Results of those samples are attached to this email report. Those results indicate sufficient nitrogen and phosphorous being discharged to cause impairment of the creek.

Water tests alone do not give a clear picture of the amounts of pollutant nutrients being dispersed downstream. 2018 is example of above normal rainfall with lower test results. The actual discharge is higher than would be expected under normal rainfall conditions because water is the driver of the leaching occurring, rendering the lost nitrogen and phosphorous unrecoverable. The Estherville Iowa Airport is a "National Weather Service" weather reporting station located about 5 miles east of the disposal field. They publish graphing of accumulated rainfall, so correlation can be made to help understand water test results.

IAC 61.3 (2) "General water quality criteria" has provisions that apply to discharges from the BWT waste disposal field to the creek. "c. Such waters shall be free from material attributable to wastewater discharges or agricultural practices producing objectionable color, odor, or other aesthetically objectionable conditions.". The injection of highly diluted hog waste into soils capable of high infiltration rates, coupled with the management decision to pattern tile the disposal field have led to nutrient pollution and subsequent algae blooms as documented by water tests and photographic evidence. "e." same explanation as "c.". "h.....No new waste discharges will be allowed on water courses which directly or indirectly enter sinkholes or losing stream segments." The creek is a losing stream. This is readily apparent in low flow situations, when upper reaches cease to flow and stream reappears fed by spring water generated from the losing stream recharge. In 2014 I had well drilled in close proximity to the creek bed and springs. The unconfined static water elevation in the well, the elevation of losing stream and elevation of spring discharge are similar, further evidence of the creek exhibiting losing stream characteristics.

I assume the Spencer Field Office notified the people responsible for compiling the 2020 impaired water list, that the creek received a discharge of manure from the BWT waste disposal field that resulted in impairment of the creek in Dec. 2018. This resulted in a violation issued based on IAC 61.3 (2). This violation, by itself, should justify inclusion in 2020 impaired water listing as the violation continued into 2019 unresolved. Details can be obtained by viewing Administrative Consent Order NO. 2019-AFO-23.

My water testing procedures and the fact I am a certified Iowa Water Volunteer water monitor should qualify my data as "creditable". That data and photographic evidence validate the impaired water status for 2020 listing.

I applied to Region 7 EPA for protection of my drinking water sources under the Sole Source Aquifer Protection Program. That document was received Dec 3, 2015 at Region 7 headquarters, by the then Director of the Water, Wetlands and Pesticide Division, Karen Flournoy. That document describes in detail the connection between between my drinking water sources and the recharge area for my wells and the downstream springs. This document addresses the "losing" stream that is covered in IAC 61.3(2)h. The first 100 yards inside BWT's waste disposal field is a perennial stream, beyond that point the stream is intermittent and enter a area that DNR CAFO Siting map describes as alluvial. Those alluvial soils cause the creek to be a losing stream at that point as well as already noted further downstream where "losing" stream characteristics are again being observed. This field should not be used for injection of highly diluted hog waste that has both direct access to surface water thru the extensive tile system and access to the shallow aquifer from the "losing" stream.

IOWA DEPARTMENT OF NATURAL RESOURCES  
ADMINISTRATIVE CONSENT ORDER

IN THE MATTER OF:

NEW FASHION PORK, LLP  
Facility ID #68455

ADMINISTRATIVE CONSENT ORDER  
NO. 2019-AFO-23

Emmet County, Iowa

TO: New Fashion Pork, LLP  
c/o Jay Moore, Environmental Director  
P.O. Box 244  
Jackson, Minnesota 56143

**I. SUMMARY**

This administrative consent order is entered into between the Iowa Department of Natural Resources (DNR) and New Fashion Pork, LLP (NFP) for the purpose of resolving the violations of animal feeding operation regulations and water quality regulations resulting from the land application discharge of manure during NFP's application of manure in Emmet County, Iowa. This administrative consent order (Order) requires NFP to take steps to prevent all future discharges to a water of the United States; pay an administrative penalty of \$4,800.00; and in the future comply with the laws and rules governing animal feeding operations and water quality standards for the waters of the state.

Questions regarding this administrative consent order should be directed to:

**Relating to technical requirements:**

Brandon Miner, DNR Field Office 3  
Iowa Department of Natural Resources  
1900 N Grand Ave, Ste E-17  
Spencer, Iowa 51301  
712-262-4177

**Relating to legal requirements:**

Noah Poppelreiter, Attorney for the DNR  
Wallace State Office Building  
502 East Ninth Street  
Des Moines, Iowa 50319-0034  
Phone: 515-725-8248

**Payment of penalty to:**

Director of the Iowa DNR  
Wallace State Office Building  
502 East Ninth Street  
Des Moines, Iowa 50319-0034

**II. JURISDICTION**

IOWA DEPARTMENT OF NATURAL RESOURCES  
ADMINISTRATIVE CONSENT ORDER  
ISSUED TO: NEW FASHION PORK, LLP

This administrative consent order is issued pursuant to the provisions of Iowa Code section 455B.175(1), which authorizes the Director to issue any order necessary to secure compliance with or prevent a violation of Iowa Code chapter 455B, Division III, Part 1 and of Iowa Code chapter 459; Iowa Code chapter 459 and the rules adopted or permits issued pursuant thereto; and Iowa Code section 455B.109 and 567 Iowa Administrative Code (IAC) chapter 10, which authorize the Director to assess administrative penalties.

**III. STATEMENT OF FACTS**

1. NFP owns a confined animal feeding operation located at 1448 340th Ave, Estherville, Iowa (Operation). The Operation has a maximum capacity of 4,400 head of finishing swine, totaling 1,760 animal units. The manure management plan for the Operation allows NFP to land apply manure via injection or incorporation to the field located directly to the west of the Operation (Field).

2. On November 29, 2018, NFP requested a waiver to surface apply manure to the Field without injecting or incorporating the manure due to the ground of the Field being frozen. DNR Field Office 3 granted the waiver request and sent an email detailing the recommended practices that NFP should follow to land apply manure to frozen or snow-covered ground.

3. On December 4 and 5, 2018, NFP contracted MCH Pig, L.L.C., to land apply manure to the Field.

4. On December 27, 2018, DNR Field Office 3 received a complaint that manure-filled runoff from the Field was entering an unnamed tributary of the Des Moines River (Tributary). DNR Environmental Specialist Brandon Miner responded to the Field to investigate this complaint.

5. During the investigation, Mr. Miner observed that the Field was frozen and snow-covered and that manure had been land-applied. A grassed, channelized waterway ran through the middle of the Field, connecting at the north boundary of the Field with the Tributary. The Tributary is both a water of the state and a Water of the United States. Manure-containing runoff was entering this waterway and discharging into the Tributary. The runoff smelled of manure and had a brown discoloration. Field tests of the runoff detected elevated levels of ammonia.

6. Mr. Miner collected water samples from the point immediately where the runoff left the waterway and entered the Tributary and from upstream and downstream locations from that point. Laboratory tests of the Field sample showed elevated levels of ammonia as nitrogen (32 mg/L), and biochemical oxygen demand (350 mg/L). The downstream sample showed similar results. The upstream sample point showed lower results



IOWA DEPARTMENT OF NATURAL RESOURCES  
ADMINISTRATIVE CONSENT ORDER  
ISSUED TO: NEW FASHION PORK, LLP

in both ammonia as nitrogen (5.2 mg/L) and biochemical oxygen demand (less than 40 mg/L). These results indicate the presence of manure in the runoff.

7. After the investigation, Mr. Miner contacted Jay Moore, NFP's Environmental Director, by phone to inform him of the discharge. Mr. Moore was not present at the field and was not aware of the pollution. In response to the conversation with Mr. Moore, NFP dug trenches in the Field to prevent more runoff from leaving the Field.

8. A review of the weather obtained from the federal government's weather service for Estherville, Iowa, for December 27 and the week immediately prior showed daytime temperature highs in the mid-30s to upper-30s. In addition, rainfall occurred on December 26 and 27.

9. A review of map data obtained from Google Earth shows the Field contains varying grades of slope, with slopes over 4 percent less than 200 feet from the eastern edge of the field.

10. Soil temperature data gathered by the State Climatologist of Iowa from relevant locations show soil temperatures of less than 32 degrees for the entire month of December, 2018, including on December 4 and December 27. This data indicates the soil of the field was frozen at all times pertinent to this Order.

11. On January 24, 2019, DNR issued a Notice of Violation letter to NFP detailing the violations and the associated regulations.

IV. CONCLUSIONS OF LAW

1. Iowa Code section 455B.173 provides that the Environmental Protection Commission (Commission) shall adopt rules related to water quality standards, pretreatment standards, and effluent standards. The Commission has adopted such rules at 567 IAC chapters 61 and 62.

2. 567 IAC 61.3(2) provides general water quality criteria and prohibits discharges that will produce objectionable color, odor or other aesthetically objectionable conditions; settle to form sludge deposits; interfere with livestock watering; or are toxic to animal or plant life. DNR Field Office 3 noted that runoff from the Field caused discolored water with a manure odor and elevated pollutants. The above mentioned facts indicate violations of the general water quality criteria.

3. Iowa Code section 455B.186 and 567 IAC 62.1, prohibit the discharge of pollutants into a water of the state, except adequately treated pollutants discharged pursuant to a permit from the DNR. During the field office investigation, it was determined that

IOWA DEPARTMENT OF NATURAL RESOURCES  
ADMINISTRATIVE CONSENT ORDER  
ISSUED TO: NEW FASHION PORK, LLP

untreated manure from the Operation was land applied and ultimately discharged to the Tributary. The facts of this case indicate violations of these provisions.

4. Iowa Code section 459.103 provides that the Commission shall adopt rules related to the construction or operation of animal feeding operations, including permit and minimum manure control requirements. The Commission has adopted such rules at 567 IAC chapter 65.

5. 567 IAC 65.2(3) states in no case shall manure from a confinement feeding operation be discharged directly into a water of the state or into a tile line that discharges to waters of the state. During the field office investigation, it was determined that manure from the Operation was land applied and ultimately discharged to the Tributary. The facts of this case indicate a violation of this rule.

6. 567 IAC 65.2(7) requires that all manure removed from an animal feeding operation or its manure control facilities shall be land applied in a manner which will not cause surface or groundwater pollution. The land application of manure in this case caused pollution in the Tributary. The facts of this case indicate a violation of this rule.

7. Recommended practices for application to frozen ground are contained in 567 IAC 65.3(5)"c". 567 IAC 65.3(5)"c" states that land application of manure on frozen ground should be avoided and provides recommended practices for land application of manure on frozen ground. Subparagraph 1 recommends that manure be applied to areas where land slopes are less than 4 percent in grade or to areas where control practices are sufficient to prevent runoff from reaching surface water during winter. Map data shows that this field has areas greater than 4 percent in grade, and the evidence shows that control practices are inadequate to control runoff during winter. Subparagraph 5 suggests that applicators avoid areas of concentrated flow and other surface water. The investigation showed evidence of prior concentrated flow patterns of runoff leaving the Field. Additionally, the Tributary is immediately north of the Field. Subparagraph 10 suggests that application be avoided during active runoff events or when snow or warming conditions are predicted to could cause snowmelt or runoff. The evidence shows that runoff and warming conditions were predicted on December 27, 2018. Subparagraph 11 suggests that fields should be observed during snowmelt and runoff events to identify and remediate any runoff that may occur. NFP was not present to monitor the field and failed to remediate the runoff as a result. The facts of this case indicate the recommendations of 567 IAC 65.3(5)"c" were not followed.

8. DNR has determined that there is no likelihood that the violations cited in this Order will recur if NFP implements the requirements set forth in Paragraphs 1-2, Section V of this Order.

**V. ORDER**



IOWA DEPARTMENT OF NATURAL RESOURCES  
ADMINISTRATIVE CONSENT ORDER  
ISSUED TO: NEW FASHION PORK, LLP

THEREFORE, the DNR orders and NFP agrees to the following:

1. NFP shall operate the Operation and all other animal feeding operations under its control in compliance with all applicable DNR rules and regulations;
2. NFP shall develop a Standard Operating Procedure (SOP) for land application of manure. The SOP must include the recommendations in 567 IAC 65.3(5) for land application to frozen ground as well as the procedures that will followed for land application during normal weather conditions. The SOP must include a detailed plan as to how the facility will monitor future land application. The SOP must be submitted to DNR Field Office 3 for approval within 30 days of the date the Director signs this Order. The SOP must be implemented immediately upon approval by DNR Field Office 3;
3. NFP shall pay an administrative penalty in the amount of \$4,800.00 within 30 days of the date the Director signs this administrative consent order.

VI. PENALTY

Iowa Code section 455B.109 authorizes the Commission to establish by rule a schedule of civil penalties up to \$10,000.00, which may be assessed administratively. The Commission has adopted this schedule with procedures and criteria for assessment of penalties in 567 IAC chapter 10. Pursuant to this chapter, the DNR has determined that the most effective and efficient means of addressing the above-cited violations is the issuance of an administrative consent order with an administrative penalty of \$4,800.00. The administrative penalty is determined as follows:

Economic Benefit – 567 IAC chapter 10 requires that the DNR consider the costs saved or likely to be saved by noncompliance. 567 IAC 10.2(1) states that “where the violator received an economic benefit through the violation or by not taking timely compliance or corrective measures, the department shall take enforcement action which includes penalties which at least offset the economic benefit.” 567 IAC 10.2(1) further states, “reasonable estimates of economic benefit should be made where clear data are not available.” NFP failed to properly ensure the manure being land applied did not discharge to a water of a state. This failure was a result of lack of planning, preparation, and monitoring, saving NFP nominal overhead costs. Therefore, \$800.00 is being assessed for this factor.

Gravity – One of the factors to be considered in determining the gravity of a violation is the amount of penalty authorized by the Iowa Code for that type of violation. As indicated above, substantial civil penalties are authorized by statute. Despite the high penalties authorized, the DNR has decided to handle the violations administratively at this time, as the most equitable and efficient means of resolving the matter. The discharge in this case was extensive, with a large flow from a large field that had multiple indicators of the presence of manure. Failing to appropriately land-apply manure threatens the integrity of the animal

IOWA DEPARTMENT OF NATURAL RESOURCES  
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feeding operation program and increases the risk of improper application in the future. Therefore, \$2,500.00 is assessed for this factor.

**Culpability** – NFP has a duty to follow the applicable laws and regulations while applying manure. In particular, as the owner and operator of such a large facility and as an owner of multiple facilities in Iowa, NFP should have been aware of the specific complications and requirements of land-applying manure. Applying manure to frozen ground requires additional care due to the increased risk of surface water pollution, and NFP failed to exercise the proper care in this case. Therefore, \$1,500.00 is assessed for this factor.


**VII. WAIVER OF APPEAL RIGHTS**

This administrative consent order is entered into knowingly and with the consent of NFP. For that reason NFP waives the right to appeal this Order or any part thereof.

**VIII. NONCOMPLIANCE**

Compliance with Section V of this Order constitutes full satisfaction of all requirements pertaining to the violations described in this administrative consent order. Failure to comply with this Order may result in the imposition of administrative penalties pursuant to an administrative order or referral to the Attorney General to obtain injunctive relief and civil penalties pursuant to Iowa Code section 455B.191 or Iowa Code section 459.603.

Kayla  
Lyon,  
Director

  
BRUCE TRAUTMAN, ACTING DIRECTOR  
Iowa Department of Natural Resources

Dated this 8 day of  
August, 2019

  
Chief Financial Officer  
For NEW FASHION PORK, LLP

Dated this 8 day of  
August, 2019

Noah Poppelreiter, DNR Field Office 2, EPA, VIII.D.1.a

**DNR Response:**

The DNR thanks Gordon Garrison for commenting on the draft 2020 Impaired Waters list and IR methodology. The DNR reviewed the location description of fish kill ID #908 by using the information provided by Mr. Garrison and also the location description in Administrative Consent Order # 2017-WW-08. The DNR moved the fish kill origin closer to the Section(s) 30/31 line as stated in Administrative Consent Order # 2017-WW-08. However, it shall be noted that a fish kill occurring anywhere in a segment affects the entirety of the segment.

The DNR changed the Aquatic Life Use assessments of the Unnamed Tributary to Unnamed Tributary to Des Moines River ([IA 04-UDM-6625](#)) and West Rat Creek ([IA 06-BSR-6609](#)) segments from Category 5b

to Category 4d based on the receipt of penalty issued in Administrative Consent Order # 2017-WW-08 on June 1, 2017.

Regarding Administrative Consent Order # 2019-AFO-24: the DNR changed the General Use assessment from 3a (not assessed) to 3b (potentially impaired) and added this segment to the WINOFI list. While Administrative Consent Order # 2017-WW-08 indicated that General Use water quality violations occurred, this does not automatically result in addition to the Impaired Waters list. The Administrative Consent Order # 2017-WW-08 also indicated that actions were taken by the responsible party to stop the flow of manure to the stream and did not indicate that a fish kill occurred. DNR will move this segment up on the fish kill follow-up priority list, and will also evaluate the water quality conditions of the stream during the visit.

**COMMENTS: Owen Steil, private citizen**

**Date Received:** Dec 28, 2020, e-mail

**Comment:**

**Draft 2020 List of Impaired Waters**

1 message

Owen Steil <ojsteil@gmail.com>

Mon, Dec 28, 2020 at 11:38 AM

To: IRComment@dnr.iowa.gov, Brian.Lohse@legis.iowa.gov, Mike Smith <Mike@mikesmith-ia.com>

All concerned. Attached are my comments on the proposed 2020 List of Impaired Waters draft.



water Quality letter.pdf  
28K

Owen Steil

12123 NE 66th Street  
Bondurant, IA 50035

December 28, 2020

Iowa Dept. of Natural Resources  
Attn: IR Comments  
502 E. 9th St.  
Des Moines, Ia. 50319

**RE: Draft 2020 List of Impaired Waters**

Dear Water Quality Monitoring and Assessment Section:

I, along with many Iowans have paid close attention to your proposed **Draft 2020 List of Impaired Waters**. I have long been concerned about the quality of the water in Iowa's rivers and lakes and the environmental effects caused by the steady decline in water over the past decades. Iowans look to the DNR and the Water Quality Section of the DNR to ensure that our waters are monitored and that threats to water quality are identified and addressed. I understand the political constraints that you operate under but this draft report deliberately evades the issues and purports to indicate progress when in fact water quality in our rivers, lakes and streams continues to decline.

I reference the Iowa Environmental Council comments on the proposed report dated Dec. 15, 2020 which expose the many deficiencies of the report. You have deliberately manipulated the facts put forward to lead to a false conclusion. To include Category 3 segments in the determination of impaired segments says to me you have no intention of being truthful with the people of Iowa. This, Dear Council, is manipulation of the facts and pure fraud. I call on you to recalculate your estimate of impaired segments after the Waters in Need of Further Investigation segments are removed from the calculation. Only assessed segments should be included in the determination of impaired and non-impaired waters.

Beyond questioning your report for what it includes, the more damning aspect of it is what it does not include. What is the standard we hope to achieve? What is the plan to achieve the goal? What needs to be done to make progress on the plan? The lack of specificity to these questions says to me that the Water Quality Section is more concerned with covering up the lack of progress in water quality than reporting on the full spectrum of water quality, improvement plans and actions needed to honestly say to the people of Iowa where we are at with water quality.

I know that the DNR is seriously underfunded, that you lack the people and programs to accomplish even the lowest level of water quality monitoring needed to give us an accurate report. This should be highlighted in the report. Beyond this you also need to note the effect of funding on enforcement actions.

We need to know why the quality of our rivers, lakes and streams is declining. An honest assessment would explain this. The answer is known to all who are concerned about our waters - nutrients from farm runoff. Let's say it for once!

Your section may not have the funds to do what needs to be done but a report like this needs to be honest and forthright so the people of Iowa can see how poorly water quality is being managed in the state. If the victims of water quality in the state had a voice louder than the perpetrators of impaired waters, your 2020 draft report would be 180 degrees different from what you propose.

Your Concerned Environmentalist, Canoeist, Swimmer and Boater

Sincerely

**Owen Steil**

cc: Iowa Environmental Council

Hon. Brian Lohse

**DNR Response:**

The DNR thanks Owen Steil for commenting on the Draft 2020 Impaired Waters list and IR methodology. The development and inclusion of the Category 3b WINOFI list is required by Iowa Code, Section 455B.195, sub section 1f (<https://www.legis.iowa.gov/docs/code/455B.195.pdf>). Please see the **WINOFI** section in the response to Commenter 1 for further discussion on the IR submittal dates.

**COMMENTS 6: Michael Schaeffer, private citizen**

**Date Received:** Dec 28, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

MICHAEL SCHAEFFER <m.r.schaeffer@hotmail.com>

Mon, Dec 28, 2020 at 7:41 PM

Reply-To: MICHAEL SCHAEFFER <m.r.schaeffer@hotmail.com>

To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

First, it is shocking to see how many impaired waters Iowa has. Several of these, like Arbor Lake in Grinnell, Rock Creek Lake, and Backbone State Park, are places I have enjoyed visiting in the past.

Second, I'm concerned that the state isn't using rigorous science as a part of the process. We should have numeric nutrient criteria or a microcystin standard; the EPA has recommendations for these. At the very least, we should be consistent in the way we collect data, so we can have sound comparisons from year to year.

Thank you,

Sincerely,  
MICHAEL SCHAEFFER  
917 PRINCE ST APT 3  
GRINNELL, IA 50112

**DNR Response:**

The DNR thanks Michael Schaeffer for commenting on the draft 2020 Impaired Waters list and IR methodology. With respect to the comment on adoption of numeric nutrient criteria or a microcystin standard prior to the development of the 2022 impaired waters list, the DNR continues to participate in the development of scientifically defensible criteria. Please see the **Numeric Nutrient Criteria / Microcystin Criteria** section in the response to Commenter 1 for further discussion on the IR submittal dates.

**COMMENTER 7: Benjamin J. Maas, Ph.D., private citizen or Associate Professor | Environmental Science and Geology | Buena Vista University**

**Date Received:** Dec 29, 2020, e-mail

**Comment:**

## Draft 2020 list of impaired waters

1 message

Ben Maas <maas2@bvuu.edu>  
To: "IRcomment@dnr.iowa.gov" <IRcomment@dnr.iowa.gov>

Tue, Dec 29, 2020 at 10:49 AM

Dear Water Quality Monitoring and Assessment Section,

Hello, attached are my comments on the Draft 2020 list of impaired waters for the state of Iowa. These comments represent myself and also the Raccoon River Watershed Association. Thank you for the opportunity to provide comments on this important topic.

Ben

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**Benjamin J. Maas, Ph.D.**

Associate Professor | Environmental Science and Geology  
712.749.2279 | 610 West 4th St., Storm Lake, Iowa 50588  
bvuu.edu



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Comments DNR impaired waters\_RRWA 2020.pdf  
251K





Benjamin J. Maas, Ph.D.  
Associate professor of Environmental Science and Geology  
Buena Vista University  
610 West 4<sup>th</sup> ST  
Storm Lake, IA 50588  
Office: (712) 749-2279  
Email: [maas2@bvu.edu](mailto:maas2@bvu.edu)

December 29, 2020

Iowa Department of Natural Resources  
Attn: IR Comments  
502 East 9<sup>th</sup> Street  
Des Moines, IA 50319  
Email: [IRcomment@dnr.iowa.gov](mailto:IRcomment@dnr.iowa.gov)

RE: Draft 2020 List of Impaired Waters

Dear Water Quality Monitoring and Assessment Section

I am writing to offer the following comments on the draft 2020 list of the Section 303(d) 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 and members. My comments can be classified into two categories, specific to the Storm Lake area and the Raccoon River, and general comments regarding the data used.

**Specific Comments to Storm Lake and The North Raccoon River**

My 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, and bacteria: indicator bacteria – E. coli 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 and E. Coli; however, as the data range is 2014 – 2018<sup>1</sup>, these recent improvements have not been included in the draft list. For example, during the summer of 2020, none of the Storm Lake beaches were listed on the Iowa DNR's Beach Monitoring website that list warnings for beaches, including for indicator bacteria. Water quality data collected by Dr. Maas and students, from 2015 – 2020, during the spring through fall of each year indicate that turbidity of Storm Lake has decreased below Iowa DNR and EPA guidelines since the arrival of zebra mussels. Additionally, data on indicator bacteria were collected during the summer of 2020 by BVU faculty and students and were also below water quality standards. In another example, Poor Farm Creek<sup>2</sup>, which flows north out of the City of Storm Lake, was listed in 2006 for a fish kill that resulted from a fuel spill of an unknown source. No action on this location has yet been taken and Poor farm Creek has not yet been removed from the list of impaired waters, despite the fact that this spill likely has been remediated.

**It is our opinion that the data used in the 2020 draft do not represent Storm Lake's or Poor Farm Creek's current water quality. As such, it is recommended that both Storm Lake and Poor Farm Creek be removed from the list of impaired waters due to improvements in water quality.**

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<sup>3</sup> 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 are one criteria used to list a stream and river segment as impaired<sup>4</sup>. Recent and continuous water quality data from the Iowa Institute of Hydraulics Research<sup>5</sup> (IIHR) elevated concentrations of nutrients along the North Raccoon River. Data from IIHR also indicates elevated nutrients concentrations along other segments.

1.

### General Comments

Indicator bacteria and biological impairments accounted for 429 impairments, down from 574 impairments in the 2018 report, in Iowa's rivers and stream segments. In Iowa's lakes, reservoirs, and wetlands, there were 32 impairments, down from 35 impairments in the 2018 report, caused by indicator bacteria and biological impairments. Despite this fact though, the Iowa still does not have a recommendation for a microcystin water quality standard. Overall, the 2020 list had 750 "impaired" segments, down from 767 in the 2018 report. This translates to an astounding 88% (579 of 658) of Iowa's waters used for recreation, A1 recreational use, that are impaired. From these impaired waters, there were 97 fish kills reported, 38 of which were caused by animal waste and 18 that the source could not be identified. **We call on the state to better regulate its point source and especially its non-point source pollution so that the states waters, especially those used for recreational activities, can improve.**

While fewer impaired waters being listed might initially seem like good news, these results also came from fewer tests. Despite fewer tests being conducted, the percentage of Iowa's rivers & streams and lakes & reservoirs that are now considered "impaired" is at 61% for Iowa river & stream segments and 67% for Iowa lakes & reservoir segments that are classified as "impaired". This level of impairment came despite 52%, up from 48% in the 2018 report, of Iowa river & stream segments and 47%, up from 35% in the 2018 report, of Iowa lakes & reservoir segments either not being assessed or data not being included in the draft 2020 Impaired Waters List. These locations include ones that are used by Iowans for recreation and are critical for Iowa's tourism industry. **Therefore, we desire that these locations that were either not assessed or not included in the draft 2020 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<sup>5</sup> and the Iowa Limnology Lab at Iowa State University<sup>6</sup>), the discontinued IOWATER program, and current citizen science initiatives, provide important data that could help fill in current Iowa DNR data gaps.**

Indicated by the Iowa Environmental Council in their letter to the Iowa DNR regarding the 2020 draft, the Iowa DNR has neither made a significant attempt to remove water from the "impaired" list nor has the Iowa DNR made a honest effort to develop and then implement a total maximum daily load (TMDL) to improve the water quality of waters listed as "impaired". The lack of an honest attempt by the state of Iowa to improve water quality suggests the state is in fact "OK" with more than half of its waters being polluted to the point of being listed as "impaired".

Also pointed out by the Iowa Environmental Council and indicated on the EPA's website<sup>6</sup>, the final 2020 list was supposed to have been submitted April 1, 2020. While the 2020 draft of impaired waters was released earlier than the 2018 draft, the 2020 draft was still released late, despite the fact that fewer sites were assessed for. The 2020 draft also utilizes outdated data, from the years 2014 – 2018, 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 network<sup>5</sup> as well as from Iowa Limnology Lab at Iowa State University<sup>6</sup>. 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, resulting in an increase in nitrogen and phosphorus loads in Iowa streams<sup>7,8</sup>. Data from the last few years, especially the IIHR<sup>5</sup> river monitoring data, that might show the impact of the increase in tile drains are not included in the 2020 draft. **It would be prudent that the state invests the resources needed for the Iowa DNR to collect the data needed for the 303(d) report and to also submit the report on time to the EPA as indicated by federal law.**

As for the 99 segments that are being delisted from the 2020 impaired waters list, the majority for "TMDL preparation and approval or new data", because more recent data are not included in some cases



in the 2020 draft it seems a little hasty to remove some of these locations. This is especially true for locations that were listed due to bacteria, algae, or other biological issues. Four, down from six in the 2018 draft report, sites are being removed from the list due to an "assessment error" due to changes in DNR methodology or insufficient frequency of data collection, despite the fact that more frequent sampling might warrant these locations to potentially still be listed as impaired. We recommend that the processes used to remove waters from the "impaired" list be made clearer and more data presented as to how and why that segment is being removed from the list of impaired waters.

Thank you for the opportunity to comment on the important topic of Iowa's water quality and on the draft 2020 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  
bvui.edu



**Supporting information:**

1. Iowa DNR, ADBNet Water Quality Assessments Impaired Waters Lists Storm Lake IA 04-RAC-1143.  
<https://programs.iowadnr.gov/adbnet/Segments/1143/Assessment/2020>
2. Iowa DNR, ADBNet Water Quality Assessments Impaired Waters Lists Poor Farm Creek IA 04-RAC-1883.  
<https://programs.iowadnr.gov/adbnet/Segments/1883>
3. Iowa DNR, ADBNet Water Quality Assessments Impaired Waters Lists North Raccoon River IA 04-RAC-1139.  
<https://programs.iowadnr.gov/adbnet/Segments/1139>
4. 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>
5. Iowa Water Quality: Information System <https://iwqis.iowawis.org/>
6. [https://www.epa.gov/sites/production/files/2018-01/documents/final\\_2018\\_ir\\_memo.pdf](https://www.epa.gov/sites/production/files/2018-01/documents/final_2018_ir_memo.pdf)
7. The Science of Improving Iowa's Water Quality, Jones, C., IHR research Engineer, Water Quality Monitoring & Research,  
<https://www.ihr.uiowa.edu/ciones/scientific-insights-into-improving-water-quality-in-iowa/>
8. United States Department of Agriculture National Agricultural Statistics Service Quick Stats,  
<https://quickstats.nass.usda.gov/>
9. Iowa Limnology Lab, <https://iowalimnology.weebly.com/>

3. 610 W. Fourth Street • Storm Lake, Iowa 50588 | [www.bvu.edu](http://www.bvu.edu)

**DNR Response:**

The DNR thanks Benjamin Maas for commenting on the draft 2020 Impaired Waters list and IR methodology. 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 2020 turbidity and *E. coli* data collected as a part of the ambient lake monitoring and beach surveillance programs will be included in the 2022 IR. The most up-to-date information on state water bodies that the DNR currently samples can be found on the state water quality database AQUIA (<https://programs.iowadnr.gov/aquia/>).

With respect to the Poor Farm Creek fish kill, based on current 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 the fish community. This segment has been given a high priority on the fish kill follow-up segment list.

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, 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 5bt) based on biological sampling. The most recent sample (2015) indicated that both the fish and benthic macroinvertebrate communities are not impaired. However, 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 US EPA-approved 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 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 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 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. Information about Iowa’s Credible Data Law can be found in Iowa Code, Section 455B.195 (<https://www.legis.iowa.gov/docs/code/455B.195.pdf>).

By methodology, the 2020 cycle is required to use credible data collected between 2016-2018 for rivers and 2014-2018 for lakes. The 2022 cycle will include more recent data, specifically river data collected between 2018-2020, and lake data from 2016-2020. This data range allows time for all the data to be uploaded into the databases of their respective organizations and also provides sufficient time for DNR to complete the IR in a timely manner.

Based on DNR IR methodology, a segment must support its designated use(s) for two consecutive cycles or have a TMDL prepared and accepted to be delisted. Requiring that values meet applicable water quality criteria for two consecutive listing cycles is designed to avoid impairment flip-flopping that can occur with high-variability and weather-influenced parameters.

With regards to TMDL production and implementation of TMDL documents, the DNR continues implementation of its TMDL Vision adopted in 2014. The TMDL Program constitutes the second half of Section 303(d) of the Clean Water Act. A TMDL document contains two distinct parts, known colloquially as the “math” and the “path.” The “math” refers to the actual TMDL calculation, which sets the total maximum daily load (and usually a longer time step for implementation purposes). This daily load is

parsed out between a margin of safety protective of the water body, a sum of Waste Load Allocations to all permitted point sources in the watershed, and the sum of Load Allocations to all nonpoint or non-permitted sources of pollution. The “path” refers to DNR’s efforts at developing implementation and monitoring chapters in the document, which aim to provide a starting point for local planning efforts. Once a TMDL earns approval from EPA, the NPDES Program uses Waste Load Allocation calculations to inform permit requirements for pollutants of concern. The Section 319 Program uses a TMDL document to inform the development of a Watershed Management Plan, required to unlock implementation dollars for reduction of nonpoint sources of pollution.

Since adoption of the TMDL Vision in 2014, the DNR has completed over 40 TMDLs for eutrophic lakes across the state. Additionally, the DNR earned approval for the statewide TMDL for beach bacteria impairments, which includes TMDLs for the first three beaches in the study with more planned as data allows. Finally, the DNR completed a stream bacteria TMDL for the Iowa River basin that included 47 TMDLs approved in 2018. A similar effort for the Chariton River basin with 15 TMDLs for bacteria was submitted at the end of 2020.

**COMMENTER 8: Steve Roe, President of the Panora Conservation Chapter of the Izaak Walton League of America**

**Date Received:** Dec 31, 2020, e-mail


**Comment:**

**Comments Draft 2020 List of Impaired Waters**  
2 messages

**Panora Conservation** <iwla.panoraconservation@gmail.com>  
To: IRcomment@dnr.iowa.gov

Thu, Dec 31, 2020 at 3:43 PM

A letter from Steve Roe, President of the Panora Conservation Chapter of the Izaak Walton League of America is attached.

 scan0001.pdf  
690K



## Panora Conservation Chapter Of The Izaak Walton League of America

December 31, 2020

Iowa Department of Natural Resources

Attn: IR Comments

Email: [IRcomment@dnr.iowa.gov](mailto:IRcomment@dnr.iowa.gov)

Dear Water Quality Monitoring and Assessment Section,

I am writing to voice the concerns of myself, the board of directors and members of the Panora Conservation Chapter of the Izaak Walton League of America. I am sitting at my desk looking at frozen Lake Panorama, created by a dam on the Middle Raccoon River. I have lived within 2 miles of the Raccoon River for over 50 years. Our members are outdoors enthusiasts. Our members live by our mission statement: To conserve, restore and promote the sustainable use and enjoyment of our natural resources, including soil, air, waters and wildlife. We appreciate the efforts of the Iowa DNR that further our mission. However, we believe that more can be accomplished.

We have reviewed the Impaired Waters 303(d) list for 2020 that has been assembled by the Iowa DNR. Simply put, water quality is not improving. The list indicates that 88% of the class A1 recreational waters are listed as "impaired". Recreation and tourism opportunities are greatly diminished. The segments that have been assessed and have newly completed TMDLs will need funding to implement practices for improvement. It will take 5 to 10 years to significantly improve the outcome.

The data used was from 2014 to 2018. Is it possible to request current data from the Iowa Limnology Lab at Iowa State University and from the IHR's statewide stream monitoring network at the University?

We lobbied successfully to raise hunting and fishing license fees to provide more revenue to the DNR. We have not been as successful with the Legislature and Governor on other funding issues. We will make our views and mission known to the legislature.

Steve Roe, President

6380 Panorama Dr., Panora, IA 50216, 515-229-1669  
[Iwla.panoraconservation@gmail.com](mailto:Iwla.panoraconservation@gmail.com)

### DNR Response:

The DNR thanks Steve Roe for commenting on the Draft 2020 Impaired Waters list and IR methodology. By IR methodology, the 2020 cycle was required to use credible, readily available data collected between 2016-2018 for rivers and 2014-2018 for lakes. The 2022 cycle will include more recent data,

specifically river data collected between 2018-2020 and lake data from 2016-2020. This data range allows time for all the data to be uploaded into the databases of their respective organizations and also provides sufficient time for DNR to complete the IR in a timely manner. For the 2022 IR cycle, DNR will contact the Iowa State Limnology Laboratory and IIHR for their readily available and credible data. Information about Iowa's Credible Data Law can be found in Iowa Code, Section 455B.195 (<https://www.legis.iowa.gov/docs/code/455B.195.pdf>).



**COMMENTER 9: Lisa Stark, Sustainable Schools | Green Iowa AmeriCorps Education & Outreach  
Coordinator, Iowa City Community School District**

**Date Received:** Jan 1, 2021, e-mail

**Comment:**

**Draft 2020 List of Impaired Waters**

1 message

**Lisa Stark** <stark.lisa@iowacityschools.org>  
To: IRcomment@dnr.iowa.gov

Fri, Jan 1, 2021 at 5:59 PM

Dear Water Quality Monitoring and Assessment Section:

I wanted to offer the following comments on the draft 2020 list of the Section 303(d) impaired waters.

As you know 2020 has been a challenging year for all of us. One of my greatest concerns regarding the pandemic and sheltering in place at my home in Iowa City, Iowa was our lack of clean water. I didn't know where or how my family would be able to recreate safely at Lake Macbride through the summer months as the inevitable algae blooms, e coli bacteria, microcystin levels increase over time. I call on the state to take on stronger leadership to improve Iowa's water quality and significantly reduce the amount of impairments. This is a public health crisis that needs to be taken more seriously in order to offer a safer and better quality of life for Iowans.

I would also like to add general comments from the Iowa Environmental Council.

□ A high proportion of assessed waters are impaired. Although the 2020 list has fewer impaired segments needing a total maximum daily load (TMDL) than the 2018 list (750, down from 767), the proportion of assessed waters listed as impaired rose from 54% to 58%. 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 develop and implement TMDLs to improve the waters enough for them to be considered for removal. Instead, state leadership expects Iowans to accept that more than half the waters in Iowa 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 significantly reduce the number of impairments.

□ Inclusion of Category 3 segments in the assessment misleads the public. Category 3 - Waters in Need of Further Investigation (WINOFI) - is used by DNR to categorize waters for which there is insufficient data to determine whether designated uses are being met. These waters are not determined to be either supporting or not supporting of their designated uses. However, DNR includes them in the total count of waters assessed. These waters are in fact not assessed by definition – the Category 2 3 designation is for waters that are unable to be assessed for impairment due to insufficient data. Therefore, it is misleading to include these waters in the total number of waters that have been assessed. In the 2020 draft list, 266 segments are categorized as WINOFI. If those segments are excluded from the assessment, only 1,034 segments were actually assessed by DNR and determined to be supporting or not supporting. Of those segments, more than 72% are impaired. IEC calls on DNR to exclude Category 3 waters from the impaired waters assessment because the waters remain unassessed. Inclusion of Category 3 misleads the public about the number of waters assessed and the percentage of waters determined to be impaired.

□ A high proportion the state's A1 primary recreational waters are impaired. Of Iowa's waters that have been assessed for A1 recreational use, 88% (579 of 658) are impaired. Public lands and waters are owned by the people of Iowa under the care of the state. Iowans are not getting the full benefits of the state's primary recreational waters due to poor water quality. The state has done an inadequate job of protecting public lands and waters for public recreational use. The Council calls on DNR to prioritize TMDL completion for Iowa's recreational waters and improve Iowa's recreational water quality for the benefit of Iowans. □ Iowa still does not have numeric nutrient criteria or a microcystin standard. The EPA has issued a recommendation for a microcystin water quality standard that would protect recreational users and has released draft criteria for numeric nutrient criteria. IEC calls on the state to adopt numeric nutrient and microcystin criteria prior to the development of the 2022 impaired waters list. These criteria are necessary to understand the condition of Iowa's waters.



□ The state's monitoring program is not rigorous and does not allow for comparison over time. When the impaired waters list is released, DNR staff takes the position that the results cannot be interpreted to give Iowans an understanding of Iowa's water quality. This is due at least partially to using data that is collected haphazardly from all available sources instead of being collected through a standardized, rigorous monitoring scheme that allows comparison over time.<sup>1</sup> If the state had a common monitoring plan that used a watershed approach to collect data and assess water quality, the impaired waters list would be a much more useful tool for actually understanding the state's water quality and progress toward meeting water quality standards. IEC urges the DNR to develop a standardized monitoring plan using the watershed approach that is scientifically rigorous, allows interpretation of results, and is useful to the public. Such a plan might resemble Minnesota's watershed lake and stream monitoring program, which fully assesses watersheds on a 10-year cycle.

DNR released the 2020 draft impaired waters list and integrated report on December 1, 2020. This is eight months after the deadline for the list and report to be submitted to EPA – on April 1 of even numbered years.<sup>2</sup> While this is a significantly faster turnaround than the 2018 list, which was released nineteen months late, the DNR is still behind on meeting statutory and regulatory deadlines. It is also noticeable that although the list was released eleven months faster than the previous list, more than 100 fewer segments were assessed. The Council calls on the state to provide enough resources to DNR to meet its obligation to submit the 303(d) list and integrated report by the deadlines in federal law.

**COMMENTS ON IOWA'S RECREATIONAL LAKES** The Iowa Environmental Council completed detailed reviews of the DNR assessment information for state park recreational beaches. Based on our review, IEC has identified several waterbodies for which the state should do more to protect and improve our water quality. Many of the state's premier recreational lakes continue to be impaired due to indicator bacteria.

The following table lists when state park lakes were added to the impaired waters list for indicator bacteria (*E. coli*) and when a TMDL was completed, if any. Lake Cycle Added TMDL completed TMDL Priority Backbone 2004 N/A Tier II Beeds 2002 2006 N/A Keomah 2008 N/A Tier II Lower Pine 2006 N/A Tier II Macbride 2006 N/A Tier I West Okoboji (06-LSR-2066) 2006 N/A Tier II

These six lakes continue to experience chronic *E. coli* contamination, resulting in swim advisories during the summer recreation season that turn visitors away from safely recreating and enjoying Iowa's state parks. Lake Macbride is considered a Tier I priority for TMDL completion due to the impairment's high social impact and relatively low complexity or cost for development.<sup>3</sup> Yet more than a decade later, the state still has not completed a TMDL for indicator bacteria for the lake. DNR added Backbone Lake to the impaired waters list in 2004. Backbone was Iowa's first state park, dedicated by the state in 1920. It has many unique features including limestone cliffs and Civilian Conservation Corps buildings constructed in the 1930s. In a year where Iowa celebrated one hundred years of state parks, it is a disgrace that water quality in Backbone Lake, Iowa's flagship park, has been so poor for decades, the beach 233 U.S.C. § 1315(b)(1); 40 C.F.R. § 130.7(d).<sup>3</sup> Iowa DNR. "Long-term vision for assessment, restoration, and protection under the Clean Water Act Section 303(d) program." Oct. 2015. Pg. 4-5. 4 is under swim advisories more than 75% of the recreational season every summer, and there is no TMDL to address this chronic impairment. Beeds Lake is another particularly unfortunate example of the state's lack of progress toward meaningfully protecting and improving recreational water quality. Although DNR added Beeds Lake to the impaired waters list in 2002 and completed a TMDL in 2006, the lake continues to be plagued by *E. coli* contamination more than a decade later. For the 2014-2018 reporting period covered by the 2020 assessment, Beeds Lake was under swim advisories for at least half of every summer recreation season. Number of Weeks under *E. coli* Swim Advisory Out of 15 or 16 Week Recreational Season (exceeding single sample 235 MPN/100 mL or 5-week geometric mean 126 MPN/100 mL)<sup>4</sup> 2014 2015 2016 2017 2018 Backbone 12 14 14 13 14 Beeds 10 9 13 7 8 Keomah 3 0 4 3 6 Lower Pine 2 8 9 6 9 Macbride 1 7 5 4 11 West Okoboji (Emerson Bay Beach) 1 7 7 6 7 We urge the DNR to not only complete TMDLs for these lakes, but for the state to provide adequate resources to implement the TMDLs, improve the water quality of these lakes, and remove them from the impaired waters list.

Please take action. Please protect our water quality.  
Thank you for this opportunity to comment on the draft 2020 impaired waters list.

—  
Lisa Stark  
Sustainable Schools | Green Iowa AmeriCorps  
Education & Outreach Coordinator  
Iowa City Community School District  
<https://www.greeniowaameri corps.org/>

The DNR thanks Lisa Stark for commenting on the draft 2020 Impaired Waters list and IR methodology. In reference to the addition of the general comments from Iowa Environmental Council, please see the response to Commenter 1 for further discussion on Iowa Environmental Council's general comments.

**Responses and actions to comments received on general water quality:**

The DNR received the following emails on general water quality during the public comment period. While these emails are not directly applicable to Iowa's 2020 Impaired Waters List, these emails were forwarded on to more appropriate contacts within the DNR.

**COMMENTS 10: Lynn Davis, private citizen**

**Date Received:** Dec 3, 2020, e-mail

**Comment:**

**impaired waters**  
1 message

LYNN DAVIS <LYNNDAVIS1@msn.com>  
To: "IRcomment@dnr.iowa.gov" <IRcomment@dnr.iowa.gov>

Thu, Dec 3, 2020 at 8:48 PM

Interesting article in the Mason City Globe Gazette regarding the polluted waters of this state. The cause of all this is directly related to agriculture, the DNR knows that too. I am a 66-year-old man that has lived in north Iowa my entire life. I remember the days I used to go fishing with my grandfather at Clear Lake, Crystal Lake, Winnebago River and other places where you could see the bottom at six feet. Those days are gone forever. Reason being is the DNR has let the Farm Bureau buy this state. Farmers are allowed to do whatever they want, however they want, regardless of rules and regulations pertaining to animal waste and chemical application to their ground.

Every year I witness the abuse right here in Hancock County in the vicinity of Eagle Lake. Have owned a cabin there for nearly 40 years. These guys that have hog confinements in the area totally disregard the regulations. Last spring, I witnessed surface application of pig shit on several acres of land with pools of raw manure standing in various locations on the field. As well I have witnessed pipes running across fields with the discharge going directly into a drainage ditch or stream.

Why are these people allowed to continue doing this???? Answer is money, the Farm Bureau, big hog business. Iowa used to pride itself in clean air and clean water a great place to move to and raise a family. Nobody wants to move here anymore. People don't like smelling hog shit, swatting flies, or taking your kids fishing in water that looks like a sewage lagoon.

I respected the DNR all my life, been a big supporter of Ducks Unlimited and other organizations that help improve the quality of life in Iowa for people like myself that enjoy hunting and fishing. Unfortunately, I have lost respect for the DNR for their lack of enforcement on the people that are ruining this state.

If you would like names or more information on the abuse going on in my area, please feel free to contact me via e-mail or phone @ [REDACTED]

**DNR Response:**

This comment was forwarded to Field Office #2 in Mason City. Field Office #2 staff contacted Mr. Davis and discussed his email and concerns.



**COMMENTS 11: Steve Throssel, private citizen**

**Date Received:** Dec 22, 2020, e-mail

**Comment:**

**Iowa water quality**

1 message

Steve Throssel <sthrossel@aol.com>  
To: IRcomment@dnr.iowa.gov

Tue, Dec 22, 2020 at 9:53 PM

To whom it may concern,

I purchased a digital electron microscope that magnifies up to 2,500 times and I purchased water quality testing kits from Lowe's to test for Alkalinity, PH levels, Nitrites, Nitrates, lead and pesticides (atrazine) and e-coli.

I have been testing my farm pond which was the first NRCS Pine Creek Watershed project in the eastern basin that feeds Pine Creek and flows into Pine Lake. It drains 550 acres. I also have been sampling water from Pine Creek. I take samples once a month and have been keeping records since July 2020. Unfortunately the fish in Pine Creek have disappeared, either killed or simply moved west into the Upper lake of the State Park. In any event Pine Creek is devoid of fish life where it thrived a mere five years earlier. Again on my property and obvious to me. I have recorded a number of readings showing e-coli and done e-coli culturing tests and in July, August and September. Pine Creek was full of e-coli and a number as of yet unidentified of other bacterias. I took screenshots of the x 2,500 magnified bacterias and many are in motion. I am analyzing them over the winter as microbiology is not my profession. I was an industrial chemist for ten or twelve years. I noticed the e-coli not only in culturing tests but also visible in screenshots and videos from the microscope that I can make available. I was concerned that in September after aerial spraying had been completed and the harvest had begun that Atrazine was showing up just under the EPA's acceptable limits. I wondered why this could be as we were in a drought with no runoff. Then it occurred to me that it was in the harvest dust. With the increased spraying due to flattened corn from the derecho it made perfect sense.

I am not trying to sword fight with any government agency. I am simply trying to understand the depth and scope of the problem as the polluted water flows through my property about a mile from Upper Pine Lake and I am planning to building a phosphorus capture pond with a gypsum raceway and using e-tubes or Gabriel baskets of charcoal and aluminum treated wood chips to see if I can mitigate some of the damage to the stream before it enters the State Park. It was a five year plan and this is the end of year two and it's on track for the first retention and settling pond to be in place in year 3, 2021. The second pond would go in in 2021 or 2022. Depending on weather and funding. So far I am paying for everything. I do have the NRCS's blessing and encouragement but have yet to get any positive feedback or help from the DNR. It will happen as I will be applying for the flood plain development permits shortly and have the necessary data from the DNR's 2015 Pine Lake State Park mitigation studies showing soil types, hydrology and annual rainfall. My hope is that the DNR will embrace the project as a positive as I will be reawakened dormant oxbows and using them as the basis for the retention and settling ponds that utilize gypsum and calcium as chelation.

Here is the plan and here are picture of a tile running pollutants into Pine Creek on my property from a neighboring farm field.

Steve Throssel  
Sent from my iPad

**2 attachments**



image0.jpeg  
2563K



image1.jpeg  
1672K

**DNR Response:**

This comment was forwarded to Field Office #2 in Mason City. Field Office #2 staff indicated that Mr. Throssel had previously contacted Field Office #2 with his concerns. Field Office #2 staff visited the site, collected water samples, and provided guidance to Mr. Throssel.

**General water quality emails and letters received:**

The DNR received the following emails and letters on general water quality during the public comment period. The DNR acknowledges receipt of the comments; however, these comments do not directly apply to Iowa's Draft 2020 Impaired Waters List or IR methodology.

**COMMENTER 12: Mark W Gardner, private citizen**

**Date Received:** Dec 1, 2020, e-mail

**Comment:**

**Lake Odessa once water temperatures reaches 80 degrees they should start letting river water trickle through**  
1 message

**markwgardner2** <markwgardner2@gmail.com>  
To: IRcomment@dnr.iowa.gov

Tue, Dec 1, 2020 at 7:50 PM

Sent from my U.S. Cellular® Smartphone

**COMMENTER 13: Mireille Cauldren, private citizen**

**Date Received:** Dec 3, 2020, e-mail

**Comment:**

**Clean water is essential in Iowa**  
1 message

**Mireille Cauldren** <mcauldren@gmail.com>  
To: IRcomment@dnr.iowa.gov

Thu, Dec 3, 2020 at 9:27 AM

Please enforce the clean water laws and make and enforce new laws and demand that gross polluters clean up what they have caused. Without clean water every living thing suffers or is lost forever!

**COMMENTER 14: John McCormick, private citizen**

**Date Received:** Dec 3, 2020, e-mail

**Comment:**

**2020 IDNR Impaired Waters List**  
1 message

**John McCormick** <jmccormick@cfu.net>  
To: IRcomment@dnr.iowa.gov

Thu, Dec 3, 2020 at 1:51 PM

The number of impaired Iowa waters is unacceptably high. Voluntary compliance by small and large polluters is obviously not working adequately to solve the problems in my lifetime. I support legislation with the teeth necessary to protect our water.

John McCormick  
2717 Minnetonka Dr  
Cedar Falls, IA 50613

**COMMENTER 15: Kary Paulson, private citizen**

**Date Received:** Dec 3, 2020, e-mail

**Comment:**

### Clear lake and Winnebago and shell rock rivers

1 message

**kary paulson** <ksp\_nsb@yahoo.com>  
To: IRcomment@dnr.iowa.gov

Thu, Dec 3, 2020 at 6:35 PM

Could you just leave us alone we know good from bad water

If the dnr and epa keeps up at their speed there will be no recreation or for that matter of fact no farming

Get out of our lives we are not stupid peoples that depend on government employees to protect us

Kary s paulson

Sent from my iPad

#### COMMENTS 16: All Cats, private citizen

Date Received: Dec 4, 2020, e-mail

Comment:

### Iowa DNR Attn: Impaired Waters/Segment List WQ Monitoring & Assessment Section

1 message

**All Cats** <skjpublic@gmail.com>  
To: IRcomment@dnr.iowa.gov

Fri, Dec 4, 2020 at 8:30 AM

1. Please continue & increase monitoring of Iowa's streams to improve overall watershed water quality, especially to reduce loadings of nitrates, phosphates & other nutrients--rural &/or urban, agricultural &/or industrial &/or public/municipal sources.
2. Consider expanding remote sensing devices & automated monitoring & reporting, especially in sensitive or high use watersheds.
3. Re-emphasize water quality for habitat & drinking water quality standards (more than just contact), & record monitoring for odor &/or color & turbidity (e.g. chemical discharges).
4. Re-enforce mandates for municipal enforcement of surface water runoff control permits & violations from construction sites, especially, and also from expanses like parking areas, streets & roads, golf courses, athletic fields, etc. (Some contractors are more diligent than others with sediment fences & other controls--especially @ maintenance or repair after precip. events. Monitor, Id. & fine, or punish the violators/recognize those in compliance to encourage better compliance by all.)
5. Bottom line, thank you for your service, commitment, & persistence on behalf of Iowa's citizens & abundant surface & ground water resources.
6. Iowa's goal should extend beyond maintaining or even improving water quality to restoring water quality in Iowa's ponds, lakes, streams, rivers & groundwater.
7. Where & when pertinent, expand bio-monitoring w/ sensitive native bio-indicator species--either by more biological surveys (consider high school, college classes, public surveyors) &/or contracting focused lab work in target areas.
8. Fund/promote expanded public outreach, education, & involvement like IoWater, class STEM projects, teaching kits for sampling &/or surveys, & data analysis tools & techniques.
9. Recognize successes--whether industrial, agricultural, or municipal.



**COMMENTS 17: DiamondAnn Pearls, private citizen**

**Date Received:** Dec 4, 2020, e-mail

**Comment:**

**Clean Water Act**

1 message

**DiamondAnn Pearls** <diamondpena400@gmail.com>  
To: IRcomment@dnr.iowa.gov

Fri, Dec 4, 2020 at 4:32 PM

You guys have a lot of work to be done. And a lot of problems to fix. And I have 3 suggestions that would help the Water

1. STOP BURNING FOSSIL FUELS

2. MARINE DUMPING

3. Chemical Fertilizers & Pesticides.

And there is so much more to name it's ridiculous and sad

**COMMENTER 18: Rita Goedkin, private citizen**

**Date Received:** Dec 10, 2020, Letter

**Comment:**

3390 Windsor Avenue  
Dubuque IA 52001

Iowa Department of Natural Resources  
ATTN: Impaired Waters/Segment List Water Quality Monitoring & Assessment Section  
Wallace State Office Building  
502 E. Ninth St.  
Des Moines IA 50319

December 7, 2020

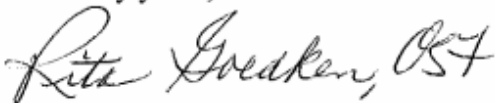
Dear Sir/Madam:

Dubuque's "Telegraph Herald" newspaper carried an editorial about the water quality challenges Iowa's rivers face. The article, and I also, urge Iowa to increase the progress made in cleaning up our state's 775 segments of impaired waterways.

It's distressing to realize that the waters of my home county (Delaware) and current residence (Dubuque), for example, have seen little progress since the last testing was done. I believe that the health of Iowa's land and rivers, the well being of Iowa's residents and visitors, and the very rivers themselves deserve and cry out for serious progress to be made.

Thank you for the concern you have for Iowa's natural resources and for your work to secure them for future generations. I urge you to secure the funding that can provide motivation to farmers and businesses to take the necessary steps to limit runoff and comply with all clean water regulations, ensuring a healthy Iowa landscape for the future.

Sincerely yours,

A handwritten signature in cursive script that reads "Rita Goedken, OSF".

Sister Rita Goedken

**COMMENTER 19: Bruce Voigts, private citizen**

**Date Received:** Dec 11, 2020, e-mail

**Comment:**

**Comment water quality document**

1 message

**Bruce Voigts** <bvoigts@hotmail.com>

Fri, Dec 11, 2020 at 10:01 AM

To: "IRcomment@dnr.iowa.gov" <IRcomment@dnr.iowa.gov>

I would like to present suggestions for the impaired waters/segment list water quality monitoring and assessment section of the document that can have comment through Dec. 30 before the document is sent to the EPA for approval as part of the federal Clean Water Act.

As a former Watershed Coordinator for the Boone River Watershed in north-central Iowa, one major objective was to reduce nitrates entering the Boone River. Working with farmers to adopt conservation practices was initially very positive with the financial incentives. These practices and incentives applied to the "lower fruit" concept or the "church choir" concepts----those conservation farmers were just waiting to be of help to adopt conservation practices for their farm. They appreciated the technical information and financial incentives from us to be able to do this. However, not all farmers were interested in conservation practices and this was a stumbling block for increasing successes in the watershed.

From this previous work I was involved with, I would like to suggest that all farmers are required to have conservation practices on their land. I think a list of say 10 conservation practices could be listed and they need to choose from this list. I would set this list with weighted points and the farmer would need to get so many points. Cover crops should be on the list with a good quantity of points and this could be subdivided into winter hardy cover crops receiving the most points and not winter hardy cover crops, such as oats, would receive points but not as much as the winter hardy such as rye. Cover crops are conservation practices that offer good examples of nitrate reduction . **(Sadly, the data from the Journal of Soil and Water Conservation, indicates only about 3-5% of all Iowa farm ground, corn and soybeans, have cover crops on them).** Other conservation practices from this list could include, but not limited to, (with various possible points) bioreactors (we installed quite a few in the Boone River Watershed), tile drainage water control structures, (we had these practices too) ,terraces, water ways, no fall tillage, no till at all, strip tillage, no fall application of nitrogen, split application of nitrogen, knifed in hog manure, tilled in chicken litter, no application of manure on frozen ground, no tillage on excessive slopes, (some of these practices are already listed and required) etc. I think all farm ground is required to have a Conservation Plan which could give points also. If a farmer does not want to choose and do some of these conservation practices, then he/she could make this choice but would not have any access to farm programs through USDA, FSA, or NRCS etc. This plan would still offer a "carrot "with financial incentives and technical information, but would have a "stick" by the requirement to implement their choice of conservation practices.

Without a "stick", I found out in my work, that some farmers are only interested in the financial aspect of farming and have little regard for the preservation of soil and prevention of water degradation.

Thank you, Bruce Voigts, Clarion, Iowa

**COMMENTER 20: Alene Rickels, private citizen**

**Date Received:** Fri, Dec 11, 2020, e-mail

**Comment:**

**Impaired Waters**

1 message

**Alene Rickels** <rnickels56@gmail.com>  
To: IRcomment@dnr.iowa.gov

Fri, Dec 11, 2020 at 2:28 PM

Our "impaired" waterways in Iowa demand greater attention. As a citizen of Iowa and a property owner with access to the Iowa River out my back door, I expect clean water. Iowa needs to further compel landowners' compliance with clean water initiatives. I agree the state needs to establish benchmark goals and monitor progress to get a real handle on whether quality is improving. I am asking for incremental progress over time of Iowa's water quality.

Respectfully,  
Alene Rickels  
19775 Hwy. D20  
Iowa Falls, IA 50126

Sent from my iPhone

**COMMENTER 21: Susie Petra, private citizen**

**Date Received:** Fri, Dec 11, 2020, e-mail

**Comment:**

**Iowa's water quality**

1 message

**SUSAN PETRA** <susieqjaguar1969@aol.com>

Fri, Dec 11, 2020 at 3:26 PM

Reply-To: SUSAN PETRA <susieqjaguar1969@aol.com>

To: "IRcomment@dnr.iowa.gov" <IRcomment@dnr.iowa.gov>

Looking at Iowa's map, one has to be in awe of how blessed we are as a state to have so many rivers, streams and bodies of water!

Growing up in Iowa, my father taught my brother & me to swim in Iowa's rivers. We fished in those rivers. Today, I would not walk in them nor eat fish from them. Much as changed since I was a child: Iowa now has over 775 polluted and impaired waters.

What have we done to our precious resource, in a scant 50 years, since I was a child? Clean, drinkable water is a resource we *canNOT* live without. And, we're in the beginnings of a multi-decade drought here in the Great Plains!

We also need to keep in mind that in just 5 years (from 2013-2018), demand for Iowa's water from the Jordan aquifer, increased by 9%! Today, it's even greater: we have the proliferation of data centers, increased residential growth, expanding agri-business (ex: CAFOs and processing plants). And lest we forget, a company wants to pump & sell our public water to an out-of-state company, to be sold to water cattle in drought-areas!

What we are doing is unsustainable! To quote Art Cullen: "We are mining our soil and our water here in Iowa and we're polluting the Gulf of Mexico, so we can grow this pork for China. These hogs (& livestock) are drinking down our underground aquifer in the upper mid-west. You think of Iowa and southern Minnesota as being water-plentiful -but we're running out of water! So, we simply can not sustain this level of (livestock) production! We certainly CAN'T increase it! There's going to be HUGE water wars erupting!"

Wall Street and big-ag has already driven-out independent pork producers; now China owns 42% of the hogs! Those farmers are now tending a hog-shed full of Chinese hogs.

So, I ask you, is THIS why Iowa is polluting our public water, endangering our health and the health of our soil? Is this why we're polluting our once-clean waters with chemicals & animal excrement, to enrich China and a few profiteers??

It's evident that we need to rethink the USDA, to re-orient our ag system to a model that's regenerative, sustainable, that restores soil health, water health, eliminating



chemical use. In the meantime the DNR MUST do its part: *regulation that compels* compliance with strict clean-water initiatives.

Susie Petra  
Retired Educator  
Ames, Iowa  
[REDACTED]

**COMMENTS 22: Del Holland, private citizen**

**Date Received:** Dec 14, 2020, e-mail

**Comment:**

**2020 Impaired Waters List in Iowa**

1 message

**Del Holland** <delholland@aol.com>  
To: IRcomment@dnr.iowa.gov

Mon, Dec 14, 2020 at 5:56 PM

Iowa DNR,

I am continually frustrated by the fact that the Iowa legislature does not adequately fund the IDNR for water quality monitoring and further that the voluntary measures they haven developed to address water quality are not working to address Iowa's water quality problems. We need to increase resources to measure accountability for water quality improvement in the state. To get improvement, the state should implement numeric criteria for nutrient pollution and have the tools and resources to enforce those standards.

Del Holland  
107 Prairie Hill Lane  
Iowa City, IA,  
52246  
[REDACTED]

**COMMENTS 23: Britt Vickstrom, private citizen**

**Date Received:** Dec 15, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

**Britt Vickstrom** <brittvickstrom@gmail.com>  
Reply-To: Britt Vickstrom <brittvickstrom@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Tue, Dec 15, 2020 at 2:41 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Britt Vickstrom  
1212 E 10th St  
Davenport, IA 52803

**COMMENTER 24: Drew Cooper, private citizen**

**Date Received:** Dec 15, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

**Drew Cooper** <drewwattscooper@gmail.com> Tue, Dec 15, 2020 at 2:42 PM  
Reply-To: Drew Cooper <drewwattscooper@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Iowa DNR,

The number of impaired waters in Iowa is unacceptable. I was born and raised adjacent to Rock Creek Lake and for my entire lifetime it seems that Iowa DNR has cared more about protecting the rights of adjacent corporate interests and land owners to pollute than the safety of residents, users of the lake, or the watershed's health.

It's shameful to see so many of our beautiful state's waters impaired—a trend that seems to be getting worse and not better.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans, even if it comes at the expense of industrial or agricultural interests.

Please do better.

Drew

Sincerely,  
Drew Cooper  
570 Juniper Avenue  
Kellogg, IA 50135

**COMMENTER 25: Edward Bjornstad, private citizen**

**Date Received:** Dec 15, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

**edward bjornstad** <edward@bjornlaw.com> Tue, Dec 15, 2020 at 2:53 PM  
Reply-To: edward bjornstad <edward@bjornlaw.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
edward bjornstad  
832 Lake Street  
SPIRIT LAKE, IA 51360

**COMMENTER 26: Marianne French, private citizen**

**Date Received:** Dec 15, 2020, e-mail

**Comment:**



**Comments on the 2020 Impaired Waters Report**  
1 message

**Marianne French** <mfrench@central.k12.ia.us>  
Reply-To: Marianne French <mfrench@central.k12.ia.us>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Tue, Dec 15, 2020 at 3:14 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Marianne French  
659 1st street NW  
Elkader, IA 52043

**COMMENTER 27: Mary Knox, private citizen**

**Date Received:** Dec 15, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

**Mary Knox** <mknox50@gmail.com>  
Reply-To: Mary Knox <mknox50@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Tue, Dec 15, 2020 at 4:08 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Our waterways should be treasured as a resource for recreation and healthy living. Iowa has long been known for it's beauty. Let's prioritize healthy, plentiful, non-polluted, waterways, that contribute to wildlife and and the health of our people.

Thank you,

Sincerely,  
Mary Knox

Sincerely,  
Mary Knox  
122 Hoover Blvd.  
West Branch, IA 52358

**COMMENTER 28: Bernardo Alayza Mujica, private citizen**

**Date Received:** Dec 15, 2020, e-mail

**Comment:**

### Comments on the 2020 Impaired Waters Report

1 message

**Bernardo Alayza Mujica** <beralmu@hotmail.com>  
Reply-To: Bernardo Alayza Mujica <beralmu@hotmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Tue, Dec 15, 2020 at 4:14 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Bernardo Alayza Mujica  
133 Sioux St  
Sioux City, IA 51111

**COMMENTS 29: Michael Henning, private citizen**

**Date Received:** Dec 15, 2020, e-mail

**Comment:**

### Comments on the 2020 Impaired Waters Report

1 message

**Michael Henning** <mikehenning@mchsi.com>  
Reply-To: Michael Henning <mikehenning@mchsi.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Tue, Dec 15, 2020 at 4:22 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

My family has been frequent Canoe and Kayak users of Iowa's Lakes and Streams since 1979. The Raccoon even goes thru part of my families farm for at least 100 years. In Brief -- Your Report is Deceptive at Best and VERY DISAPPOINTING! Iowa's River's and Streams ARE NOT Getting better!! We now have to check weekly reports to see if our destinations are POSSIBLY SAFE.... YUK. We also FREQUENTLY encounter the Big FOAMY blocks of Phosphorous, etc. pollution AND Blue Green Algae... NOT SAFE for us and DEADLY for our dogs that generally go along.

Have you read the Iowa Farm Bureau spin on your report by the organizations President??? Your "hand in glove" draft aligns almost exactly with the Article attributed to him..... GRRRR Do you work for Iowan's or the Iowa Farm Bureau??

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Michael Henning  
138 Sidehill Dr  
Waterloo, IA 50701

**COMMENTS 30: Allison Castle, private citizen**

**Date Received:** Dec 15, 2020, e-mail

**Comment:**

## Comments on the 2020 Impaired Waters Report

1 message

**Allison Castle** <ajcastle@hotmail.com>  
Reply-To: Allison Castle <ajcastle@hotmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Tue, Dec 15, 2020 at 4:28 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Allison Castle  
290 Burnside Ave  
Muscatine, IA 52761

### COMMENTS 31: Allison Brundy, private citizen

Date Received: Dec 15, 2020, e-mail

Comment:

## Comments on the 2020 Impaired Waters Report

1 message

**Allison Brundy** <afbrundy@gmail.com>  
Reply-To: Allison Brundy <afbrundy@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Tue, Dec 15, 2020 at 4:44 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Our quality of life suffers when our water is polluted. My family loves to swim and boat but we don't want to go in the water of Iowa to do these things.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Allison Brundy

Sincerely,  
Allison Brundy  
3125 Maplewood Rd  
Ames, IA 50014

### COMMENTS 32: Diana Sickles, private citizen

Date Received: Dec 15, 2020, e-mail

Comment:

### Comments on the 2020 Impaired Waters Report

1 message

**Diana Sickles** <dsickles4@gmail.com>

Tue, Dec 15, 2020 at 6:43 PM

Reply-To: Diana Sickles <dsickles4@gmail.com>

To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I agree with the statement below that has been prepared by IEC. We need desperately to clean up Iowa waters and our people need jobs to dig out from under the economic devastation that COVID-19 has caused. Let's look for some Federal funds to combine giving our out of work people employment, working toward a sustainable environment and cleaning up our waters in the process. A win-win-win plan. I know we can do it. All we need is the will

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

To that I say, Amen!

Thank you,

Sincerely,  
Diana Sickles  
1015 35th St  
Des Moines, IA 50311

**COMMENTS 33: Jody Gibson, private citizen**

**Date Received:** Dec 15, 2020, e-mail

**Comment:**

### Comments on the 2020 Impaired Waters Report

1 message

**Jody Gibson** <jodyg8@msn.com>

Tue, Dec 15, 2020 at 6:50 PM

Reply-To: Jody Gibson <jodyg8@msn.com>

To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Jody Gibson  
317 E Wall Ave  
Des Moines, IA 50315

**COMMENTS 34: Jim Johnson, private citizen**

**Date Received:** Dec 15, 2020, e-mail

**Comment:**

### Comments on the 2020 Impaired Waters Report

1 message

**Jim Johnson** <jjohnson@heartofiowa.net>  
Reply-To: Jim Johnson <jjohnson@heartofiowa.net>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Tue, Dec 15, 2020 at 7:35 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Jim Johnson  
32290 Highway 175  
Eldora, IA 50627

#### COMMENTS 35: Mark Hayes, private citizen

Date Received: Dec 15, 2020, e-mail

Comment:

### Comments on the 2020 Impaired Waters Report

1 message

**Mark Hayes** <Hayes2805@partnercom.net>  
Reply-To: Mark Hayes <Hayes2805@partnercom.net>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Tue, Dec 15, 2020 at 7:41 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Mark Hayes  
129 Carver Ave  
Rhodes, IA 50234

#### COMMENTS 36: Brandi McCauley, private citizen

Date Received: Dec 15, 2020, e-mail

Comment:

## Comments on the 2020 Impaired Waters Report

1 message

**Brandi McCauley** <mccauleyf@mchsi.com>  
Reply-To: Brandi McCauley <mccauleyf@mchsi.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Tue, Dec 15, 2020 at 7:56 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Brandi McCauley  
6215 Woodland Road  
Des Moines, IA 50312

### COMMENTS 37: Richard Sadowsky, private citizen

Date Received: Dec 15, 2020, e-mail

#### Comment:

## Comments on the 2020 Impaired Waters Report

1 message

**Richard Sadowsky** <valecnik@gmail.com>  
Reply-To: Richard Sadowsky <valecnik@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Tue, Dec 15, 2020 at 8:22 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Richard Sadowsky  
9314 Oakwood Dr  
Urbandale, IA 50322



**COMMENTS 38: Margaret Marie, private citizen**

**Date Received:** Dec 15, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

**Margaret Marie** <annbernadette29@gmail.com> Tue, Dec 15, 2020 at 8:29 PM  
Reply-To: Margaret Marie <annbernadette29@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Margaret Marie  
509 W Main St  
Washington, IA 52353

**COMMENTS 39: John Schmidt, private citizen**

**Date Received:** Dec 15, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

**John Schmidt** <jschmidt50@hotmail.com> Tue, Dec 15, 2020 at 9:12 PM  
Reply-To: John Schmidt <jschmidt50@hotmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Director Lyon,

I wish to submit my comments in regard to the Impaired Waters 303(d) List compiled by the Department for 2020, released on December 1.

I am deeply disappointed by the number of impaired waters in the State and the lack of improvement in Iowa's water quality, seven years after the Nutrient Reduction Strategy was adopted. It makes my family and me very reluctant to use many rivers and lakes due to the risk of serious illness.

The Department should request additional funding and make improving Iowa's waters for the benefit of all Iowans one of its highest priorities.

Thank you for the opportunity to offer comments.

Very truly yours,

Sincerely,  
John Schmidt  
3900 John Lynde Rd  
Des Moines, IA 50312

**COMMENTS 40: Sandra Rando, private citizen**

**Date Received:** Dec 16, 2020, e-mail



**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

Sandra Rando <sandyrando@gmail.com>  
Reply-To: Sandra Rando <sandyrando@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 16, 2020 at 6:41 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Sandra Rando  
2151 185th St Unit 2  
Fairfield, IA 52556

**COMMENTS 41: Brenda Knox, private citizen**

**Date Received:** Dec 16, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

BRENDA KNOX <brenknox@gmail.com>  
Reply-To: BRENDA KNOX <brenknox@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 16, 2020 at 8:55 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
BRENDA KNOX  
2603 Hwy 218  
Donnellson, IA 52625

**COMMENTS 42: Joseph Overmyer, private citizen**

**Date Received:** Dec 16, 2020, e-mail

**Comment:**

### Comments on the 2020 Impaired Waters Report

1 message

Joseph Overmyer <overmyerram@hotmail.com>  
Reply-To: Joseph Overmyer <overmyerram@hotmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 16, 2020 at 9:32 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Joseph Overmyer  
106 N Morgan St  
Fairfield, IA 52556

#### COMMENTS 43: Clewis Walden, private citizen

Date Received: Dec 16, 2020, e-mail

Comment:

### Comments on the 2020 Impaired Waters Report

1 message

Clewis Walden <cawalden31@gmail.com>  
Reply-To: Clewis Walden <cawalden31@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 16, 2020 at 10:08 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Clewis Walden  
6646 Holcomb Circle  
Des Moines, IA 50322

#### COMMENTS 44: Patrick Bosold, private citizen

Date Received: Dec 16, 2020, e-mail

Comment:

## Comments on the 2020 Impaired Waters Report

1 message

Patrick Bosold <bosolds@lisco.com>  
Reply-To: Patrick Bosold <bosolds@lisco.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 16, 2020 at 12:21 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality. I frequent several of the rivers in S.E. Iowa that are listed as impaired. I am deeply disappointed in the ongoing impaired condition of Lake Darling, after millions of dollars of taxpayer money have been spent in draining and remediating the lake and attempted mitigations of swine manure runoff in the Lake Darling watershed.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Patrick Bosold  
202 N 5th St  
Fairfield, IA 52556

**COMMENTER 45: Piper Wall, private citizen**

**Date Received:** Dec 16, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

Piper Wall <piperwall@q.com>

Wed, Dec 16, 2020 at 12:27 PM

Reply-To: Piper Wall <piperwall@q.com>

To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

I am very frequently in direct contact with water in many of Iowa's creeks, rivers, and lakes. That contact ranges from wading with my dog to standing waist to chest deep while teaching kayak rolling to full immersion working on and teaching canoe, kayak, and SUP skills and swift water safety and rescue skills. I believe our waterways are an important state recreational resource that continues to be adversely affected and threatened by the number of waterways that are impaired. I am concerned about the lack of improvement in Iowa's water quality and believe our state should prioritize improving our waters. I believe this should be considered even more important in light of COVID-related increases in interest in outside recreational activities.

I recognize that the Iowa DNR must work within budgetary constraints. Therefore, I request that budget priority is given to improving the water quality of all of our Iowa waterways for the benefit of all Iowans.

Thank you,

Sincerely,

Piper Wall

912 Clark Ave

Ames, IA 50010

**COMMENTS 46: Ava Auen-Ryan, private citizen**

**Date Received:** Dec 16, 2020, e-mail

**Comment:**

**Clean water should be the first priority**

1 message

Ava Auen-Ryan <info@email.actionnetwork.org>  
Reply-To: ava.socialwork@gmail.com  
To: IRcomment@dnr.iowa.gov

Wed, Dec 16, 2020 at 1:04 PM

Roger Bruner,

Hi Rodger -

I am writing to comment on the impaired waterways report. I am concerned with DNR's framing that the problem is getting better when in reality fewer waterways were assessed. It's incredibly misleading and ignores the fact that this past summer I couldn't recreate in bodies of water surrounding DSM because of pollution and our water rates increase to make water safe to drink. In addition to doing a more thorough assessments of waters - I'd appreciate if the DNR would hold polluters like the factory farm industry accountable.

Ava Auen-Ryan  
[ava.socialwork@gmail.com](mailto:ava.socialwork@gmail.com)  
650 16th St  
[Des Moines, Iowa 50314](#)

**COMMENTER 47: Virginia Meyer, private citizen**

**Date Received:** Dec 16, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

Virginia Meyer <meyervk@gmail.com>  
Reply-To: Virginia Meyer <meyervk@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 16, 2020 at 3:17 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

My family and I cannot swim in our local lakes as we have done for many years. Lake MacBride, Kent Park Lake, and Coalville lake beaches have water quality warnings or closures that occur more often every year. Scientists know the cause of the pollution is agricultural runoff, yet only voluntary measures are recommended to stop the water crisis here in Iowa. We need real solutions, not wishes and hopes.

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality. Our quality of life is also declining as the quality of our waters decline. This is a fixable problem.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Virginia Meyer  
5281 Wapsi Ave SE  
Lone Tree, IA 52755

**COMMENTER 48: Art Barton, private citizen**

**Date Received:** Dec 16, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

Art Barton <vardosrule@gmail.com>  
Reply-To: Art Barton <vardosrule@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 16, 2020 at 7:32 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Art Barton  
3802 CALHOUN AVE  
AMES, IA 50010

**COMMENTER 49: Tom Sandersfeld, private citizen**

**Date Received:** Dec 16, 2020, e-mail



**Comment:**

**Waters in Iowa**

1 message

TR S <tombsand@gmail.com>

Wed, Dec 16, 2020 at 8:40 PM

To: IRcomment@dnr.iowa.gov

Improving Iowa's waterways and lakes is a large challenge. The answer is not government alone. Placing blame is not the answer. We need to forge partnerships across all areas of government and the private sector.

There have been some advancements made. One of the challenges met was to have changes made to our septic systems and that was a large change. Septic systems used to drain directly to streams and road ditches.

There is much left to be done to show our pride in our natural systems.

1. We need to provide incentives for farmers to invest in better waterways, contour farming, buffer strips, confinement systems, and some other items. Their lively hood is important as well.
2. The application of lawn chemicals needs improvement, the disposal of home chemicals needs to be improved, the disposal of pharmaceutical compounds, and other such items. The general public must be a large component to this success.
3. Cities and towns could step up further as well with better stream management with waterways that flow thru communities. By embracing the streams that flow thru the communities being seen as an asset and not a negative.
4. State, county, city applications of salt, brine, weed killers sprayed in road ditches need further changes made. There has been progress over the years with a reduction in spraying.
5. Industry and business can step up further with the disposal of chemicals, waste, and such items. Parking lot construction, green space improvements, and water control runoff improvements could be further improved.

What is the answer then?

1. Building partnerships between government, consumers, and business.
2. Education is key with the public buying into an improvement strategy.
3. Incremental goals need to be strategized with 5, 10, 20, and 50 year goals.
4. Making a strangle hold of laws and bureaucratic requirements on the public, business and local governments is not the answer. Government is not the answer. Grass roots ownership is the best answer.
5. Education and voluntary buy-in is the best direction. Will this come easily or quickly? No, but great things in life are worth striving for.

Tom Sandersfeld

Cedar Rapids



**COMMENTER 50: Andrew Fisher, private citizen**

**Date Received:** Dec 16, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

Andrew Fisher <fishskier@gmail.com>  
Reply-To: Andrew Fisher <fishskier@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 16, 2020 at 9:23 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Frankly, it's embarrassing.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Andrew Fisher  
21100 95th Ave  
New Virginia, IA 50210

**COMMENTER 51: Nathan Unsworth, private citizen**

**Date Received:** Dec 17, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

Nathan Unsworth <nunsworth@gmail.com>  
Reply-To: Nathan Unsworth <nunsworth@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Thu, Dec 17, 2020 at 6:16 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Nathan Unsworth  
1406 S Main St  
Burlington, IA 52601

**COMMENTER 52: Keith Petersen, private citizen**

**Date Received:** Dec 17, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

**Keith Petersen** <keith.petersen.12@gmail.com>  
Reply-To: Keith Petersen <keith.petersen.12@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Thu, Dec 17, 2020 at 10:32 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Keith Petersen  
8931 Long Meadow Dr  
Johnston, IA 50131

**COMMENTS 53: Mark Scherer, private citizen**

**Date Received:** Dec 17, 2020, e-mail

**Comment:**

**impaired**

1 message

**Mark Scherer** <mascherer@gmail.com>  
To: "IRcomment@dnr.iowa.gov" <IRcomment@dnr.iowa.gov>

Thu, Dec 17, 2020 at 12:03 PM

I travel the state for my job and I still see too much fall plowing, tilling going up and down hills, ammonia being put on ground that has been frozen, the elimination of windbreaks tilling over what should be waterways. To many farmers are still not practicing conservation measures. We are polluting the water in increasing amounts. Just look at Saylorville lake, the upper part used to be 9' deep now it is islands and marsh. Enough silt has flowed into the lake to fill Kinnick stadium over 100 times. My grandfather remembered driving over the Des Moines river on the Euclid bridge and seeing the bottom of the river because the water was still clear. You will never see the bottom today, even with Saylorville Lake filtering out the sediments, because there is so much erosion of farm land. As climate change continues we will need this topsoil to stay on the fields, not filling our lake and streams.

Sent from Mail for Windows 10

**COMMENTS 54: char Lange, private citizen**

**Date Received:** Dec 19, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

char Lange <langeggcharlie@gmail.com>  
Reply-To: char Lange <langeggcharlie@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Sat, Dec 19, 2020 at 8:11 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Every year it gets worse. What can I do to stop this.  
Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
char Lange  
1209 Diana St  
Iowa City, IA 52240

**COMMENTS 55: Patricia Prijatel, private citizen**

**Date Received:** Dec 19, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

Patricia Prijatel <patricia.prijatel@drake.edu>  
Reply-To: Patricia Prijatel <patricia.prijatel@drake.edu>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Sat, Dec 19, 2020 at 4:13 PM

Dear IDNR IR Comments,

When 88 percent of our state's recreational waterways are impaired, the health of our citizens is at risk. Children are especially vulnerable. This level of pollution puts our health and our economy at risk. Outdoor recreation is a huge tourist draw, but who wants to go tubing in toxic water? The cost to clean up our waterways can pay for itself. More important, citizens should not be paying the price with their health.

Sincerely,  
Patricia Prijatel  
4519 Grand Ave #7  
Des Moines, IA 50312

**COMMENTS 56: Sara Williams, private citizen**

**Date Received:** Dec 20, 2020, e-mail

**Comment:**

**Iowa Water Quality**

1 message

**Sara Williams** <tenacioussfw@me.com>  
To: IRcomment@dnr.iowa.gov

Sun, Dec 20, 2020 at 11:42 AM

I am a concerned Iowa citizen.

I write today because clearly a voluntary approach to keeping our natural water clean is not working. To read reports which state that over 80% of our rivers and streams in Iowa are impaired or potentially impaired is appalling. We need to start moving that percentage in the opposite direction. Regulation is necessary to hold accountable the large factory farms and other offenders that add to the ever growing toxicity of our natural water bodies in Iowa. The future of Iowans will be bleak if we don't set a standard and adhere to it for generations to come. Instead of defending these increasingly grim trends in lieu of keeping shareholders of these large corporations happy think down the road to 20 years from now. If we continue to turn a blind eye to those ignorant offenders who pollute our waters without holding them accountable we will be left with land that is too toxic to farm, too toxic to raise children on, too toxic to call beautiful. Eventually they will pack up their business and go elsewhere, leaving us with irreversible damage to our soil and water. Please I demand we set the standard now and reclaim our natural waters by protecting them with strict and enforceable regulations. Thank you.

Sara Williams, Marengo Iowa.

Sent from my iPhone

**COMMENTS 57: Lora Rathje, private citizen**

**Date Received:** Dec 21, 2020, e-mail

**Comment:**

**Impaired Waterways**

1 message

Lora Rathje <info@email.actionnetwork.org>  
Reply-To: lmrathje@aol.com  
To: IRcomment@dnr.iowa.gov

Mon, Dec 21, 2020 at 11:55 AM

Roger Bruner,

The Iowa Legislature, DNR, cities, and farmers MUST DO MORE to protect our Iowa water, a critical source of life and a recreational resource for many. I don't need to tell you Iowans' lives and their quality of life are at stake, not to mention the vitally important fishing industry downstream.

To say pollution is stable in your 2020 impaired waterways report is questionable since you tested so many fewer waterways, but even if true, STABLE IS UNACCEPTABLE. Your latest report clearly shows the Nutrient Reduction Strategy (NRS) isn't working. The VOLUNTEER BABY STEPS agriculture is making to use cover crops, install bioreactors, and improve wetlands, for example, WILL NOT MAKE A SIGNIFICANT DIFFERENCE for many generations to come at the current rate of implementation. The NRS is a failure!

In talking to a local farmer who has implemented some nutrient strategies and who is also a Scott County supervisor, John Maxwell, he admitted that in his opinion, only about 25% of farmers are implementing strategies, while another 50% might if they were educated about them and had the economic resources to do so. And he explained, there are probably about 25% that just aren't interested in changing farming practices.

Maxwell, farms many acres, has a large dairy, and owns and operates a hog confinement (CAFO). He and other politicians like Ross Paustian, an Iowa Representative from my area who owns quite a number of CAFOS, obviously do not want more government regulations (referred to as government over-reach by Maxwell), which is understandable from their viewpoint, but the Iowa Legislature and agencies like the DNR have the OBLIGATION OF PROTECTING ALL CITIZENS, not just farmers and factory farm owners.

I realize this is a complex problem that will not be fixed overnight, but major steps need to be taken immediately with the goal of getting ALL farmers and agricultural corporations to use strategies to reduce nonpoint source pollution like nitrates and phosphorous from running off farm fields into Iowa's waterways and wells, as well as limiting point source pollution from cities. I believe the only way to get this done is for legislators to ENACT MANDATORY NUTRIENT REDUCTION STRATEGIES and for the DNR to do more testing of waterways and enforce more stringent requirements on both agriculture and municipalities. And, of course, since I recognize agriculture is vital to Iowa's economy, farmers and municipalities need ECONOMIC HELP to achieve the goals of Iowa's NRS. There is no easy or cheap fix, but IOWA'S WATER MUST BE MADE A TOP PRIORITY!

Cc: Chris Cournoyer  
Iowa State Senator, 49th District.

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

**COMMENTS 58: Dixie Webb, private citizen**

**Date Received:** Dec 21, 2020, e-mail

**Comment:**

**Clean Water for Christmas**  
1 message

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

Mon, Dec 21, 2020 at 12:15 PM

Roger Bruner,

After seeing some of the results of the 2020 Clean Water Assessment, I am completely surprised that the DNR is not working much harder to correct this unacceptable situation. Only 16 of Iowa's many waterways pass?!? Clean water is essential to every Iowan. Keeping our waterways safe should be your #1 priority. Please work to keep the DNR accountable to keeping our water safe for all Iowans!

Dixie Webb  
dwebb4451@gmail.com  
NW Abilene Road  
Ankeny, Iowa 50023

**COMMENTS 59: Katie Rock, private citizen**

**Date Received:** Dec 21, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

Katie Rock <katieprock@gmail.com>  
Reply-To: Katie Rock <katieprock@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Mon, Dec 21, 2020 at 1:26 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Katie Rock  
4521 49th St.  
Des Moines, IA 50310

**COMMENTS 60: Patrick Kelley, private citizen**

**Date Received:** Dec 22, 2020, e-mail



**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

**Patrick Kelley** <patrick.kelley@bkcsd.org>  
Reply-To: Patrick Kelley <patrick.kelley@bkcsd.org>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Tue, Dec 22, 2020 at 6:37 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Patrick Kelley  
2203 130th street  
Belmond, IA 50421

**COMMENTS 61: James Dodd, private citizen**

**Date Received:** Dec 23, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

**James Dodd** <lgjdodd@gmail.com>  
Reply-To: James Dodd <lgjdodd@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 23, 2020 at 8:46 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
James Dodd  
505 2nd Ave S  
Humboldt, IA 50548

**COMMENTER 62: Bob Bernard, private citizen**

**Date Received:** Dec 23, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

Bob Bernard <bearbernard46@gmail.com>

Wed, Dec 23, 2020 at 10:18 AM

Reply-To: Bob Bernard <bearbernard46@gmail.com>

To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR must prioritize improving Iowa's waters for the benefit of all Iowans.

I live in Waukee. Some outdoor waters around me are unsafe for my use. Plus they look dirty. I want specific water quality standards for use in implementing and measuring clean water standards/goals.

Our local clean water provider, must allocate millions of citizen provided dollars to make our water use safe. We would reduce this huge cost to taxpayers, if we have clean water flowing to use. As-well-as all over our state, down river to other states then into our ocean.

For all Iowans, clean water is a health necessity. Further, clean water is an important aspect in improving our climate.

Thank you,

Sincerely,  
Bob Bernard  
722 NE Wiltshire Ct  
Waukee, IA 50263

**COMMENTS 63: John Norwood, Polk County, Soil and Water Commissioner**

**Date Received:** Dec 23, 2020, e-mail

**Comment:**

**Comments on 2020 List of Iowa Impaired Waters**

1 message

John Norwood <john@tblventures.com>

Wed, Dec 23, 2020 at 10:28 AM

To: IRcomment@dnr.iowa.gov

Cc: Tim Wagner <twagner@iwa.org>, MIKE DELANEY <mikedelane1@me.com>, Environmental Law and Policy Center <elpcinfo@elpc.org>, Iowa Environmental Council <iemail@iaenvironment.org>

Dear IDNR:

John Norwood, Polk County Soil and Water Commissioner, submits the following comments on the draft 2020 list of the Section 303(d) impaired waters.

**The State's Water Quality Monitoring Program is Deficient. It Should Be Re-Designed & Optimized to Serve as a Real-Time Problem Solving Tool with Land Use Management and Fiscal Objectives; and to Target our Efforts and Our Monies**

I would like to see a comprehensive, real time monitoring system that can measure nutrient and sediments loads as water flows down our major river systems. Here in Polk County, which drains approximately 20 upstream counties through two major (Raccoon and Des Moines) and one minor river (Skunk) system, I would like to see real time monitoring of nutrient and sediment loading coming in and going out of our county (with a critical focus on what's coming into Saylorville Reservoir). It would also be useful to incorporate real time systems as we move up each river system (some stations already exist but we really need a fully functioning management system) and where possible measure loading of nutrients and sediment moving across county lines. I believe targeting investments and actions toward specific counties is critical because County Governments, specifically the board of supervisors each county, are well positioned -- with the right financial incentives available, and systems based design approaches being driven by SWCDs, IDALS, and other partners -- to help begin to facilitate the modernization of our 3,700 drainage districts on a system-by-system basis to incorporate missing design components like wetlands filtration.

If we are going to have a decent chance of improving water quality in a meaningful way, we need to transform these drainage units from the historic singular purpose of "drainage" to function as modern "water management districts" filtering, storing, recharging and possibly even providing irrigation opportunities in certain situations. The point in setting up Polk County as a model for the real time monitoring of inflows and outflows (mass balance) is to be able to assess the trends of nutrient loads over growing seasons and to appropriately target upstream investments to reduce such nutrients and soil loss. We do that, best, by monitoring pounds of material coming down our rivers each year vs. daily concentrations since mother nature can influence the latter with weather. Load is a better measure of human activities we can influence by practice, infrastructure, land use, etc.

University of Iowa scientist Chris Jones has told me after my request to crunch the numbers on inflow/outflow that Polk County is actually a nutrient sink for nitrogen and phosphorus even after accounting for our wastewater and storm water additions! Nitrogen reductions are approximately 25% and phosphorus are 50-65% over an average of growing seasons. This may be true in part due to Saylorville Reservoir's ability to convert the nutrients to biomass. The downside is that we are producing algae that is then threatening source water for drinking water and recreational purposes among other issues. Des Moines Waterworks is unable to use the Des Moines River for long stretches because of algae toxins. These toxins are very hard to remove from drinking water via traditional treatment systems. We are also filling up our reservoir(s) with sediment that over time will reduce the water holding capacity of the system for flood control and other benefits. A system wide focus on cover crops and appropriate land use activities could lengthen the useful life of the reservoir and save billions of dollars. The Federal Government has an interest in protecting the useful life of this asset and perhaps we help do that by developing a systems based approach to managing soil loss and sediment transport.

To this end, let's use some common sense and put a real time monitoring system in place with a dashboard that can be easily accessed by members of the public, policy makers, state and federal funders, and scientists and agricultural experts. The dashboard will help us determine if we are making progress and where, geographically, and through which strategies are we making the best progress? We also need to continue understand the nature of changes in the system's functioning in terms of location, timing, etc. W. Edwards Deming, the famous engineer and management guru, taught a generation of leaders about the importance of measurement and statistical analysis. One of his basic tenets was, "you can't manage, what you can't measure."

I'd like to move Iowa to be a leader in monitoring based investment.

A real time monitoring system will be critical to Iowa deploying millions to billions of dollars in agricultural infrastructure and conservation practice improvements over the next 50 years. Let's be smart how we invest this money so we can deliver the biggest bang for the buck that benefits producers, members of the public, and our global environment. What we are really taking about is massive public and private investment in our rural regions that could drive a new chapter of rural redevelopment if we can develop a shared vision around that concept and execute with some precision.

Sincerely,

John Norwood

Polk County, Soil and Water Commissioner

West Des Moines, IA 50265

December 23, 2020

**COMMENTER 64: Sandra Stanley, Clean Air Muscatine**

**Date Received:** Dec 23, 2020, e-mail

**Comment:**

**Comments on water quality**

1 message

Sandra Stanley <sandra.e.stanley@gmail.com>  
To: IRcomment@dnr.iowa.gov

Wed, Dec 23, 2020 at 10:34 AM

Water Quality Monitoring & Assessment Section

This is in reference to the recent report from Iowa's Department of Natural Resources (IDNR) released **draft 2020 303(d) Impaired Waters List for the state of Iowa.**

The report finds that of the waters tested by IDNR staff for the 2020 report, 58% have impairments. This is the highest percentage of impairments in a decade.

The 2020 report lists 1,300 waterbody segments assessed with 750 impairments. That compares to 1,422 segments assessed with 767 impairments in 2018 and 1,378 assessed segments with 750 impairments in 2016.

That means more than half of the streams, lakes, and rivers in Iowa aren't suitable for one or more of their intended uses. Iowans are losing more and more access to their valuable water resources every year.

Understanding that some of the following recommendations are beyond the reach of the DNR and need approval from the state legislature, Clean Air Muscatine recommends the following changes:

- Voluntary compliance isn't working. It's time to make mandatory requirements while still advocating for flexibility for individuals to meet the requirements.
- Iowa's DNR staff increased to better monitor Iowa's water quality and enforce compliance.
  - The 2020 Impaired Waters Report shows that a large portion of water pollution stems from factory farms and the massive amounts of manure that is spread on the land across the state. A statewide moratorium on new or expanding factory farms be implemented by the DNR and State Legislature to begin to clean up Iowa's waters.
  - The Nutrient Reduction Strategy is not working. We need increased investment in protecting our water. It is time to hold polluters accountable.
  - There are a large number of waterbodies that have a TMDL prepared but we need to implement the TMDL so the waterbody is no longer impaired. A large number of waterbodies are not being tested; we need to strive for more segments being tested every year.

Submitted by

Clean Air Muscatine

Muscatine, Iowa



**COMMENTER 65: Cherie Mortice, private citizen**

**Date Received:** Dec 23, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

Cherie Mortice <cmortice@gmail.com>  
Reply-To: Cherie Mortice <cmortice@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 23, 2020 at 4:51 PM

Dear IDNR IR Comments,

Iowa's impaired waterways are continuing to show degradation. The fact that you actually tested fewer segments and contend that there are fewer areas of degradation is all hogwash. Trying to hoodwink the public by using a Reynolds strategy to downplay contagion for Covid- less testing makes the problem seem like it is getting better - is a testament to your moral bankruptcy. The public is becoming better organized and less tolerable of subterfuge. Shame on the Iowa DNR Director.

Sincerely,  
Cherie Mortice  
2904 E 22nd Stret  
Des Moines, IA 50317

**COMMENTER 66: Timothy Ott, private citizen**

**Date Received:** Dec 26, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

Timothy Ott <rustynail64215@gmail.com>  
Reply-To: Timothy Ott <rustynail64215@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Sat, Dec 26, 2020 at 7:56 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

I must add that this is not just about Iowans. The problem with this map is that it only includes Iowa, but the water of our rivers doesn't stop at state lines. That water flows downstream to the Mississippi and from there to the Gulf of Mexico, where pollutants we put into the watershed have created a massive dead zone. There isn't a state in the USA more out of compliance with the Clean Water Act than Iowa; of all the states in the Mississippi watershed, we are more responsible than any other for that dead zone. Sometimes Iowans have a hard time getting it through their thick skulls that our actions affect people in other states. Sometimes Americans have a hard time getting it through their thick skulls that our actions affect people in other countries.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Americans, for the benefit of all humans who live downstream of us, and for the benefit of all plant and animal life that lives downstream of us.

Thank you,  
Timothy J Ott

Sincerely,  
Timothy Ott  
1203 Heritage Dr  
Osage, IA 50461



**COMMENTER 67: Rebecca Carter, private citizen**

**Date Received:** Dec 26, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

Rebecca Carter <rebeccaemmie@gmail.com>  
Reply-To: Rebecca Carter <rebeccaemmie@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Sat, Dec 26, 2020 at 10:24 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Please mandate processes and procedures to protect watershed from sediment seepage into our waterways, most importantly, as runoff from farm and development does not currently have these measures in place.

Thank you,

Sincerely,  
Rebecca Carter  
2000 High St Apt 218  
Des Moines, IA 50309

**COMMENTS 68: Dave Jacobson, private citizen**

**Date Received:** Dec 26, 2020, e-mail

**Comment:**

**Impaired waters list comments.**

1 message

Dave Jacobson <djvikes@gmail.com>  
To: IRecomment@dnr.iowa.gov

Sat, Dec 26, 2020 at 12:16 PM

DNR,

As a young boy my family bought riverfront property in Lansing, Iowa in 1968. My parents have since passed away and I have been the owner of the property for many years. In total, I have been fishing, boating, week-ending and living full time on the Mississippi River for 52 years. I am what us locals call a "river rat" and am an experienced fisherman for walleyes but also crappies, bluegills and perch on occasion.

I boat and fish in Pools 9 and 8, mostly Pool 9. The Mississippi River has changed dramatically in my 52 years here but the largest amount of change has occurred in just the last 5-8 years. By change I mean:

1. Sediment filling in backwater areas where you used to be able to fish. Now you can no longer get a boat into the same shallow areas/chutes as they are impassible.
2. Weed growth in spring and summer and the die off in the fall impacts your ability to boat and or fish. This has increased in my estimation, 500%+ or more in just the last few years.
3. Water clarity has decreased tremendously year round due to the farmland runoff and increased siltation.
4. Flooding has increased significantly due to the filling in of the backwaters and there is nowhere for the water to be stored, so water levels rise, and continue to rise each year due to increased siltation.
5. When recreational boating and swimming on the local sandbars, what used to be quality sand is now mostly a muddy mess due to the siltation from farmland runoff.
6. Ice fishing areas are filled in due to siltation.

I am a member of Friends of Pool 9 and most people in this area care deeply about the quality and future of the Mississippi River. I have only addressed a few of my concerns as an experienced "river man". If drastic changes are not implemented immediately here is what I see as the future of the Mississippi River, especially here in Pool 9:

1. There will eventually be very little or no backwaters because they have all filled in from farmland runoff/siltation.
2. Weed growth due to runoff of fertilizers and chemicals will choke out/fill in any remaining backwater water areas/channels.
3. Water quality will continue to decrease due to high runoffs of fertilizers, chemicals and siltation.
4. The only "river" left will be the 12 foot channel that is maintained for barge traffic by the Army Corps of Engineers.

God placed mankind on his beautiful creation, the earth. Man has taken this creation and is slowly destroying it. Thank goodness for past conservation programs like the recovery of Lake Erie from a dead lake to now a world class walleye water. Recent refusals by the GOP party to continue to implement better conservation programs and their elimination of many current environmental protections is tragic and hopefully the next 4 years will move our country in the right direction. Please save the waters in our state from what appears to be their inevitable demise!

Thank you!

Dave Jacobson 1896 Great River Road Lansing, Iowa 52151  
Phone: [REDACTED]

**COMMENTER 69: Megan McDowell, private citizen**

**Date Received:** Dec 28, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

**Megan McDowell** <megmcd82@gmail.com>  
Reply-To: Megan McDowell <megmcd82@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Mon, Dec 28, 2020 at 10:38 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Megan McDowell  
3604 Rollins Avenue  
Des Moines, IA 50312

**COMMENTER 70: Robert Sessions, private citizen**

**Date Received:** Dec 28, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

**Robert Sessions** <sessions.bob@gmail.com>  
Reply-To: Robert Sessions <sessions.bob@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Mon, Dec 28, 2020 at 10:43 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am very concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans. The policies now in place favor the ease and finances of big agriculture to the detriment of Iowa's 3 million citizens and wildlife.

Thank you,

Sincerely,  
Robert Sessions  
222 Fairview Ave  
Iowa City, IA 52245

**COMMENTER 71: Kevin Griggs, private citizen**

**Date Received:** Dec 28, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

**Kevin Griggs** <kgriggs@eorinc.com>

Mon, Dec 28, 2020 at 10:56 AM

Reply-To: Kevin Griggs <kgriggs@eorinc.com>

To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Kevin Griggs  
1719 Mamie Eisenhower Ave  
Boone, IA 50036

**COMMENTER 72: Michael Barkalow, private citizen**

**Date Received:** Dec 28, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

**Michael Barkalow** <barkalowmichael@gmail.com>

Mon, Dec 28, 2020 at 11:11 AM

Reply-To: Michael Barkalow <barkalowmichael@gmail.com>

To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Michael Barkalow  
896 Archer Drive  
Marion, IA 52302

**COMMENTER 73: Mary Kirkpatrick, private citizen**

**Date Received:** Dec 28, 2020, e-mail

**Comment:**

## Comments on the 2020 Impaired Waters Report

1 message

Mary Kirkpatrick <patchworkmaryj@msn.com>  
Reply-To: Mary Kirkpatrick <patchworkmaryj@msn.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Mon, Dec 28, 2020 at 12:11 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

Please do more to protect Iowans' water!!!!!!

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Mary Kirkpatrick  
431 Elmridge Avenue  
Iowa City, IA 52245

**COMMENTER 74: Jim Trepka, private citizen**

**Date Received:** Dec 28, 2020, e-mail

**Comment:**

## Comments on the 2020 Impaired Waters Report

1 message

Jim Trepka <jim\_trepka@msn.com>  
Reply-To: Jim Trepka <jim\_trepka@msn.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Mon, Dec 28, 2020 at 1:07 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Jim Trepka  
242 Highland Dr  
Iowa City, IA 52246

**COMMENTER 75: Larry Kaeding, private citizen**

**Date Received:** Dec 28, 2020, e-mail

**Comment:**



## Comments on the 2020 Impaired Waters Report

1 message

Larry Kaeding <lkaeding@hotmail.com>

Mon, Dec 28, 2020 at 2:07 PM

Reply-To: Larry Kaeding <lkaeding@hotmail.com>

To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Larry Kaeding

Sincerely,  
Larry Kaeding  
904 Holiday Ln  
Coralville, IA 52241



**COMMENTER 76: Linda Quinn, private citizen**

**Date Received:** Dec 28, 2020, e-mail

**Comment:**

## IR Comments

1 message

Linda Quinn <quinnhenry@msn.com>

Mon, Dec 28, 2020 at 3:17 PM

To: "IRcomment@dnr.iowa.gov" <IRcomment@dnr.iowa.gov>

Dear Iowa Department of Natural Resources,

Your latest DNR report on impaired waterways shows -once again- Iowa's problem of polluted waterways. It's horrendous and not getting any better, despite the people's vote to fix it back in 2010. We have allowed the agricultural industry to pollute our water to the point where most is not safe for recreation and become too costly to make it safe for drinking.

I am angry that the rivers near my home in eastern Iowa, the Cedar, Wapsipinicon, and Iowa are degraded for recreational kayaking. I'm saddened that nearby lakes (Lake Macbride, Lake Darling, Coralville Reservoir) are unsafe for swimming.

I'd like for DNR to address and correct the impairments in a timely fashion. It's time to prioritize people over profits and take meaningful actions to fix this problem.

And the fixes don't have to be costly! And there are fixes that can be done right away. Chris Jones, IIHR Research Engineer, has outlined fixes in his blog here: [https://www.iihr.uiowa.edu/cjones/this-might-hurt-some-feelings/?doing\\_wp\\_cron=1609187930.8426830768585205078125](https://www.iihr.uiowa.edu/cjones/this-might-hurt-some-feelings/?doing_wp_cron=1609187930.8426830768585205078125). The short list is Reformulate CAFO Regulations, make farmers adhere to Iowa State University fertilization guidelines, ban manure on snow and frozen ground, ban fall tillage, ban row crop agriculture in the 2-year flood plain.

Iowa needs your help, DNR! Let your report lead the way to cleaning our polluted water.

Sincerely,

Linda Quinn or Iowa City

**COMMENTER 77: Russ Ver Ploeg, private citizen**

**Date Received:** Dec 28, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

Russ Ver Ploeg <rvp@verploegarch.com>  
Reply-To: Russ Ver Ploeg <rvp@verploegarch.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Mon, Dec 28, 2020 at 3:59 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Russ Ver Ploeg  
4812 Pleasant St  
Des Moines, IA 50312

**COMMENTER 78: Mary Maher, private citizen**

**Date Received:** Dec 28, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

MARY Maher <irishmaher4@gmail.com>  
Reply-To: MARY Maher <irishmaher4@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Mon, Dec 28, 2020 at 4:23 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

I kayak Lake McBride many times each season and do not think it is safe not to take action to clean up this body of water and Iowa's other impaired waterways.

I think the polluters should be identified and be held monetarily accountable to clean up Iowa's impaired bodies of water.

Also there should be a moratorium on new CAFO's until this crisis is under control.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
MARY Maher  
2639 Davie Street  
Davenport, IA 52804

**COMMENTS 79: Adam Krause, private citizen**

**Date Received:** Dec 28, 2020, e-mail

**Comment:**

### Comments on the 2020 Impaired Waters Report

1 message

Adam Krause <adamgkrause@gmail.com>

Mon, Dec 28, 2020 at 5:07 PM

Reply-To: Adam Krause <adamgkrause@gmail.com>

To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Iowa DNR,

I am submitting comments about the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020 released on December 1.

I am disgusted with the amount of impaired waters in the state and lack of improvement in Iowa's water quality. Our waterways are absolutely disgusting. Having moved here from California, I am shocked by this state's wanton disregard for water. Water is life. This state, with leadership from DNR, must get out from under the tyranny of the Farm Bureau and begin treating our waters like the life giving force they are instead of allowing industrial agriculture and confined animal feeding operations to use our waters as their personal sewage dumps. Times have changed - it's time for Iowa to step up and become a leader in water improvement/environmental action/climate change mitigation - and Iowa DNR can take a decisive role in that.

The Iowa DNR absolutely must prioritize improving Iowa's waters for the benefit of all and quit cow toeing to industrial ag and confined animal feeding operations.

Sincerely,

Sincerely,  
Adam Krause  
2400 Elizabeth Ave  
Des Moines, IA 50317

**COMMENTS 80: John Klein, private citizen**

**Date Received:** Dec 28, 2020, e-mail

**Comment:**

### Comments on the 2020 Impaired Waters Report

1 message

John Klein <iowakleins@gmail.com>

Mon, Dec 28, 2020 at 6:59 PM

Reply-To: John Klein <iowakleins@gmail.com>

To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

Concerning the public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and especially the multi-year lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans. It is your responsibility to inform and recommend solutions to the state's leadership, not the other way around. They need to take action, but it is your environmental knowledge that they depend upon to make intelligent long-term multigenerational decisions. That certainly has not been your case in the past.

Thank you,

Sincerely,  
John Klein  
30 N Eyberg, P O Box 175  
Treyvor, IA 51575

**COMMENTER 81: Linda Drish, private citizen**

**Date Received:** Dec 28, 2020, e-mail

**Comment:**

### Comments on the 2020 Impaired Waters Report

1 message

Linda Drish <linda@drishphotography.com>

Mon, Dec 28, 2020 at 9:30 PM

Reply-To: Linda Drish <linda@drishphotography.com>

To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

I am constantly checking the water quality reports in my area lakes but most especially Lake Darling because I kayak. I love that Lake so much but most of the summer it's not healthy to come in contact with the water. I will search other lakes to find similar reports but the levels are not as high as Lake Darling.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans for all activities. I'm also concerned about the people that do not know to check water quality prior to boating, fishing or swimming. Even when the beach is CLOSED I see families swimming in it.

Thank you,  
Linda Drish

Sincerely,  
Linda Drish  
2450 Sockum Ridge Rd  
Washington, IA 52353

**COMMENTER 82: John Moellers, private citizen**

**Date Received:** Dec 28, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

**John Moellers** <john.moellers@gmail.com> Mon, Dec 28, 2020 at 11:38 PM  
Reply-To: John Moellers <john.moellers@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
John Moellers  
2934 E. Court St  
Iowa City, IA 52245

**COMMENTER 83: Ben Maas, private citizen**

**Date Received:** Dec 29, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

**Ben Maas** <bmaasmn@gmail.com> Tue, Dec 29, 2020 at 11:46 AM  
Reply-To: Ben Maas <bmaasmn@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Ben Maas  
905 Pleasantview Dr  
Storm Lake, IA 50588

**COMMENTER 84: Carolyn Uhlenhake Walker, private citizen**

**Date Received:** Dec 30, 2020, e-mail



**Comment:**

**Comments about the protection of our "Recreational Waters" in Iowa**

1 message

Carolyn Walker <carolynruw@gmail.com>

Wed, Dec 30, 2020 at 4:17 AM

To: IRcomment@dnr.iowa.gov

To the DNR staff responsible for "improving our Recreational Waters":

I use to live near "Beeds Lake" which has been on the impaired waters list for a long time. I would see the signs warning people of the problem with swimming at one of our favorite picnic and swimming places. I am a retired teacher and don't get to Beeds Lake as often.

But I urge you, as our state protector, to have stricter regulations and testing of recreational waters like Beeds Lake! We, Iowans, trust you to stand up for the beautiful places that need to be protected! It would be great and I would know you are truly doing your job, if when I go back to Beeds Lake for a family get-together in the next couple of years, there would no longer be "warning signs" about swimming and having "fun" at Beeds Lake!

Please take "cleaning up" the 750 bodies of water more seriously and diligently! I'm not a biologist that understands all the testing that the DNR is doing, but I do see that you are still not doing a thorough job of cleaning up the water of Iowa!

Sincerely,

Carolyn Uhlenhake Walker

4111 Ingersoll Ave. #1110

Des Moines, IA 50312

**COMMENTS 85: Gary Westcott, private citizen**

**Date Received:** Dec 30, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

Gary Westcott <qarmn@outlook.com>

Wed, Dec 30, 2020 at 6:55 AM

Reply-To: Gary Westcott <qarmn@outlook.com>

To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,

Gary Westcott

240 high street

Emmons, MN 56029

**COMMENTER 86: Brent Greiner, private citizen**

**Date Received:** Dec 30, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

**Brent Greiner** <BRENTGREINER@gmail.com>  
Reply-To: Brent Greiner <BRENTGREINER@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 30, 2020 at 9:02 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Brent Greiner  
3335 TERRACE LAKE RD  
CRAWFORDSVILLE, IA 52621

**COMMENTER 87: Kylie McArtor, private citizen**

**Date Received:** Dec 30, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

**Kylie McArtor** <kylie.mcartor@gmail.com>  
Reply-To: Kylie McArtor <kylie.mcartor@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 30, 2020 at 10:49 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Kylie McArtor  
306 W Market St  
What Cheer, IA 50268

**COMMENTER 88: S. Josh Daines, M.P.A., M.B.A., M.Ed., private citizen**

**Date Received:** Dec 30, 2020, e-mail

**Comment:**

**Impaired Iowa waters public input**  
1 message

Josh D <joshdaines@gmail.com>  
To: IRcomment@dnr.iowa.gov

Wed, Dec 30, 2020 at 11:08 AM

Good morning —

Please accept this as my input for the public comments regarding impaired Iowa waters.

Voluntary nutrient reduction does NOT work. Please stop this hoax.

Iowa agriculture operations have been allowed to run ruff shod over this state for decades . . . NO MORE!

This state has other citizens / stakeholders besides farmers. We have rights, and deserve a seat at the table as well.

Iowa now has a generation who are told to stay out of Iowa waterways because they are simply too dangerous . . . .  
This is a sad legacy.

Thank you for your time,

S. Josh Daines, M.P.A., M.B.A., M.Ed.  
[joshdaines@gmail.com](mailto:joshdaines@gmail.com)  
- a concerned Iowa taxpayer

**COMMENTER 89: Keane Timmerman, private citizen**

**Date Received:** Dec 30, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

Keane Timmerman <keanet55@gmail.com>  
Reply-To: Keane Timmerman <keanet55@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 30, 2020 at 11:54 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Keane Timmerman  
321 North main street  
Dundee, IA 52038

**COMMENTER 90: Rick Robinson, Conservation & Natural Resources Policy Advisor, Iowa Farm Bureau Federation**

**Date Received:** Dec 30, 2020, e-mail

**Comment:**

## IFBF Impaired Waters List Comments

1 message

**Rick Robinson** <rrobinson@ifbf.org>  
To: "IRcomment@dnr.iowa.gov" <IRcomment@dnr.iowa.gov>  
Cc: Kayla Lyon <kayla.lyon@dnr.iowa.gov>

Wed, Dec 30, 2020 at 12:40 PM

Please accept these comments from the Iowa Farm Bureau Federation regarding the Iowa DNR's draft 2020 list of impaired waters as required by Section 303(d) of the federal Clean Water Act.

Thank you for the opportunity to comment.

### **Rick Robinson**

Conservation & Natural Resources Policy Advisor

[Iowa Farm Bureau Federation](#)

[5400 University Ave.](#)

[West Des Moines, IA 50266](#)

[515-225-5432 \(office\)](#)

[515-240-2056 \(cell\)](#)

[rrobinson@ifbf.org](mailto:rrobinson@ifbf.org)

[Friend Me on Facebook](#)

[Follow Me on Twitter](#)

[ConservationCountsIowa.com](http://ConservationCountsIowa.com)

---

### 2 attachments



[WWW.IOWAFARMBUREAU.COM/100](http://WWW.IOWAFARMBUREAU.COM/100)

image001.gif  
14K



DNR Impaired Waters List Comments 12.17.2020.pdf  
123K



December 17, 2020

Attention: IR Comments  
Water Quality Monitoring & Assessment Section  
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 more than 154,000 members, appreciates the opportunity to comment and note the investment of all Iowans' in protecting our water and soil.

The 2020 Clean Water Act Section 303(d) integrated list by the Iowa Department of Natural Resources confirms a 6 percent decline in the number of impaired waterbodies and a 7 percent decline in the number of impairments, the first time such a decline has been recorded. Iowans can be confident that virtually all of Iowa's waters continue to be safe for recreation, fishing and other designated uses.

There were also 99 waterbodies removed from the impaired waters list, the largest number ever removed during a two-year report cycle. Contributing to this milestone was the establishment of 61 general watershed plans (47 were bacteria-reduction plans developed by DNR in the Iowa River basin). Removals are also due to new data, previous assessment errors that were corrected, recovery of the fish community, and water quality improvements. This underscores one of the intended uses of the list: to identify waters that need attention and devise a general plan for local watershed residents to refine and implement to eventually remove the impairment.

Locally-driven efforts - while hard work - have proven to be the most successful strategy in obtaining real and significant water quality improvement. Local stakeholders - rural and urban - have a key role in promoting awareness and educating others about the plans, working together to adopt more comprehensive, site-specific watershed improvement plans, and applying the right voluntary best management practices in the most effective locations.

Iowa farmers continue to do their share in making additional water quality and conservation progress that contributes to fewer impaired waters and local watershed plan success. For example, despite the challenges of doing business during the COVID-19 pandemic, the Iowa Department of Agriculture and Land Stewardship helped Iowa farmers install a record number of conservation practices and structures in the last fiscal year (5,532), and the second-highest dollar value ever of those practices, in the last fiscal year. IDALS invested \$16.6 million in all cost-share programs, including \$876,206 in nutrient reducing edge-of-field wetlands, bioreactors and saturated buffers through the state's Water Quality Initiative that leveraged more than \$1.9 million towards these nutrient removal edge-of-field practices, all that help limit E coli growth.

Last year, the Iowa legislature continued its commitment for Iowa's water quality initiative, the implementing program for the Iowa Nutrient Reduction Strategy, and its traditional water quality and soil conservation programs, including more than \$10.5 million in annual funding for the state's WQI. These





funds were in addition to the increased funding from Senate File 512 (the long-term, \$270 million in sustainable funding for the INRS that was approved during the 2018 session) and are now being used to scale-up Iowa's investment in conservation and water quality. Similar support will be needed to continue reducing water impairments and implementing local watershed plans in the future.

While the challenge of improving Iowa's water quality remains an ongoing effort, Iowans can be confident the 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 of 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 that state officials, natural resource managers, and other experts are using this report as one tool to help them continue to guide our water quality improvement efforts.

Sincerely,

Rick Robinson  
Conservation & Natural Resources Policy Advisor

**COMMENTER 91: Warren Wicks, private citizen**

**Date Received:** Dec 30, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

**Warren Wicks** <warren.wicks@ew-nutrition.com>  
Reply-To: Warren Wicks <warren.wicks@ew-nutrition.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 30, 2020 at 12:52 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Warren Wicks  
6801 NW 86th St  
Johnston, IA 50131

**COMMENTER 92: Debbie Swanson, private citizen**

**Date Received:** Dec 30, 2020, e-mail

**Comment:**



## IR Comments Water Quality Monitoring & Assessment Section

1 message

D <dsnyder678@gmail.com>  
To: IRcomment@dnr.iowa.gov

Wed, Dec 30, 2020 at 1:38 PM

To whom it may concern,

I dont know how laws pertaining to buffer strips around water ways are made but I truly feel that requiring a certain footage should be mandated. My husband works for the city where we live and he tests the water regularly and has been told by those who have worked for the city for 20+ years that when the farmer close to the water plant was required to put in a buffer strip next to the river the nitrates went down 90%!!

I have seen many places around Carroll county where farmers will have cattle/pigs and the run off literally goes right into the river either next to it (Dedham) or runs right into the Nistnabotna per a water way. We use the Raccoon river quite often for swimming, tubing and canoeing. I watch the bacteria levels quite often as I have 2 young kids. Please do something about this and SOON, as I would like to use Swan Lake more but ever since I was kid (30 yrs ago) it has been disgusting and I will not allow my kids to swim there or Blackhawk lake. We had to go hours north to find a lake that looked nice and had low bacteria.

We shouldn't and wouldn't have this issue if more regulation on buffer strips were done. I have seen more trees, grass and bushes ripped out of water ways and ditches this year than I have in a long time and it just keeps getting worse. The animals have no where to go and we are going to have a wildlife crisis soon if the state doesn't do something soon!! The simple fact that 60% of Iowans don't farm but most of our land is farmland makes NO SENSE. 74.7% is farmland, the highest among the states?!? Thats insane and horrible for our environment, as I am sure you all know.

Could the state buy up some farm land around lakes and important rivers and then use it as a park? Could the state offer better payments for people to do buffer strips or winter cover crops? Could the state not allow for more cattle and pig farms to be built especially around water ways?? There are so many more things I feel the DNR could do and wish you guys would do.

Thank you for all you do and thank you for your time!!

Debbie Swanson  
Manning, IA

**COMMENTER 93: James Moore, private citizen**

**Date Received:** Dec 30, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

James Moore <mooredesign79@gmail.com>  
Reply-To: James Moore <mooredesign79@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 30, 2020 at 2:46 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
James Moore  
3604 Rollins Ave  
Des Moines, IA 50312

**COMMENTER 94: Milt Owen, private citizen**

**Date Received:** Dec 30, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

milt owen <miltowen47@gmail.com>  
Reply-To: milt owen <miltowen47@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 30, 2020 at 2:49 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

I would agree with comments submitted by the Iowa Environmental Council (IEC) when they "urge DNR to develop a standardized monitoring plan using the watershed approach that is scientifically rigorous, allows interpretation of results and is useful to the general public."

Thank you,

Sincerely,  
milt owen  
1260 490th St  
St. Ansgar, IA 50472

**COMMENTER 95: Rhonda Appelgate, private citizen**

**Date Received:** Dec 30, 2020, e-mail

**Comment:**

## Comments on the 2020 Impaired Waters Report

1 message

Rhonda Appelgate <rhondaappelgate@gmail.com>  
Reply-To: Rhonda Appelgate <rhondaappelgate@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 30, 2020 at 3:20 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Rhonda Appelgate  
615 10th street  
Nevada, IA 50201

### COMMENTS 96: Ruth Hardin, private citizen

Date Received: Dec 30, 2020, e-mail

Comment:

## Comments on the 2020 Impaired Waters Report

1 message

Ruth Hardin <ruth.crossroads@gmail.com>  
Reply-To: Ruth Hardin <ruth.crossroads@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 30, 2020 at 4:01 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Ruth Hardin  
4719 71st St  
Urbandale, IA 50322

### COMMENTS 97: Kevin Lee, private citizen

Date Received: Dec 30, 2020, e-mail

Comment:

### Comments on the 2020 Impaired Waters Report

1 message

Kevin Lee <stonecut@mchsi.com>

Wed, Dec 30, 2020 at 4:21 PM

Reply-To: Kevin Lee <stonecut@mchsi.com>

To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Kevin Lee  
2526 173rd. Ave.  
Decorah, IA 52101

**COMMENTS 98: Rachel Teal, private citizen**

**Date Received:** Dec 30, 2020, e-mail

**Comment:**

### Comments on the 2020 Impaired Waters Report

1 message

Rachel Teal <rayraycooker@gmail.com>

Wed, Dec 30, 2020 at 4:27 PM

Reply-To: Rachel Teal <rayraycooker@gmail.com>

To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,  
Rachel Teal

Sincerely,  
Rachel Teal  
1775 Floraview Dr.  
Dubuque, IA 52001

**COMMENTS 99: Rachel Meyers, private citizen**

**Date Received:** Dec 30, 2020, e-mail

**Comment:**

### Comments on the 2020 Impaired Waters Report

1 message

Rachel Meyers <rlm7224@gmail.com>  
Reply-To: Rachel Meyers <rlm7224@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 30, 2020 at 5:01 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality. I am especially concerned about the South Skunk as it runs through Ames where I live.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,  
Rachel Meyers

Sincerely,  
Rachel Meyers  
1010 Curtiss Ave  
Ames, IA 50010

**COMMENTS 100: Samantha Appelgate, private citizen**

**Date Received:** Dec 30, 2020, e-mail

**Comment:**

### Comments on the 2020 Impaired Waters Report

1 message

Samantha Appelgate <samanthaappelgate@gmail.com>  
Reply-To: Samantha Appelgate <samanthaappelgate@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 30, 2020 at 7:09 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Samantha Appelgate  
615 10th st  
Nevada, IA 50201

**COMMENTS 101: Wendy Ruble, private citizen**

**Date Received:** Dec 30, 2020, e-mail

**Comment:**

### Comments: Draft 2020 List of Impaired Waters

1 message

Wendy Ruble <wendyruble@gmail.com>  
To: IRcomment@dnr.iowa.gov

Wed, Dec 30, 2020 at 9:15 PM

I am no water expert. I am a water lover and an Iowa lover and 5th generation Iowan.  
Please listen and act.  
I support these expert comments from the Iowa Environmental Council.  
Its waaaaaaaaaaaaay past time to support the beautiful, natural world that is Iowa. In particular that supports us all.

<https://www.iaenvironment.org/webres/File/IEC%20comments%20-%202020%20303d%20draft%20list.pdf>

**COMMENTS 102: Debby Friedrichs, private citizen**

**Date Received:** Dec 30, 2020, e-mail

**Comment:**

### Comments on the 2020 Impaired Waters Report

1 message

Debby Friedrichs <Dfrerichs3@mchsi.com>  
Reply-To: Debby Friedrichs <Dfrerichs3@mchsi.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Wed, Dec 30, 2020 at 9:29 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Debby Friedrichs  
940 N Tyler  
Mason City, IA 50401



**COMMENTER 103: Bobbi Allen, private citizen**

**Date Received:** Dec 31, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

**Bobbi Allen** <bobbjallen314@gmail.com>  
Reply-To: Bobbi Allen <bobbjallen314@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Thu, Dec 31, 2020 at 6:07 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Bobbi Allen  
PO Box 345  
Palo, IA 52324

**COMMENTER 104: Brittany Allen, private citizen**

**Date Received:** Dec 31, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

**Brittany Allen** <dogmombydesign@gmail.com>  
Reply-To: Brittany Allen <dogmombydesign@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Thu, Dec 31, 2020 at 9:37 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Brittany Allen  
2559 Magnolia Rd  
Decorah, IA 52101

**COMMENTER 105: Paige Letzke, private citizen**

**Date Received:** Dec 31, 2020 , e-mail

**Comment:**

**water comment**

1 message

Paige L <pletzke.p@gmail.com>

Thu, Dec 31, 2020 at 9:58 AM

To: "ircomment@dnr.iowa.gov" <ircomment@dnr.iowa.gov>

Ban CAFO's. Why do we let so much animal waste into bodies of water?

**COMMENTS 106: Lynne Currie, private citizen**

**Date Received:** Dec 31, 2020, e-mail

**Comment:**

**Water Impairment**

1 message

Lynne Currie <lec821@gmail.com>

Thu, Dec 31, 2020 at 12:34 PM

To: IRcomment@dnr.iowa.gov

I live in Iowa City and am very concerned, and even outraged, by the poor state of our precious natural water bodies. My family lived in Wisconsin for 12 years, and then returned to Iowa 9 years ago. In Wisconsin we freely enjoyed recreating in rivers and lakes without fear of getting sick or suffering health problems. It has been shocking that the majority of the lakes, rivers, and streams in Iowa are so polluted that wildlife are dying, people's drinking water is not safe, and it is highly risky to recreate in the water.

I receive DNR's emails regarding conscious, egregious water pollution infractions around the state. Clearly voluntary programs and the consequences for not following the weak laws we do have in place (the small fines) are not enough to stop people from polluting the water that belongs to all of us, and that we all rely on for life and quality of life.

Please do whatever you can to *prevent* pollution, and influence our legislative body to make water quality a priority, not just a talking point. It is possible to change people's behavior, and I believe we have to start by *requiring* participation in nutrient-reduction programs, and increasing the consequences for polluting.

Every single Iowan is negatively affected by not having clean, safe water to drink, a healthy ecosystem to support life, and an opportunity to fully enjoy the beauty of our state's natural water bodies. We need to do better.

Sincerely,  
Lynne Currie

**COMMENTER 107: Christine Leutzinger, private citizen**

**Date Received:** Dec 31, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

Christine Leutzinger <summergem4@gmail.com>  
Reply-To: Christine Leutzinger <summergem4@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Thu, Dec 31, 2020 at 6:08 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Christine Leutzinger  
2729 W 35th St  
Davenport, IA 52806

**COMMENTER 108: Ed Lancaster, private citizen**

**Date Received:** Dec 31, 2020, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**  
1 message

ED LANCASTER <eagle10009@hotmail.com>  
Reply-To: ED LANCASTER <eagle10009@hotmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Thu, Dec 31, 2020 at 7:16 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
ED LANCASTER  
8610 HARRINGTON DR NE  
CEDAR RAPIDS, IA 52402

**COMMENTER 109: Kevin Seng, private citizen**

**Date Received:** Jan 1, 2021, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

**Kevin Seng** <kevseng@gmail.com>

Fri, Jan 1, 2021 at 7:02 AM

Reply-To: Kevin Seng <kevseng@gmail.com>

To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Dear IDNR IR Comments,

Dear Iowa DNR,

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Kevin Seng  
115 lovejoy Ave  
Waterloo, IA 50701

**COMMENTER 110: Jeff Benz, private citizen**

**Date Received:** Jan 1, 2021, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

Jeff Benz <solarbtu@gmail.com>  
Reply-To: Jeff Benz <solarbtu@gmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Fri, Jan 1, 2021 at 11:12 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I was born and raised on my parent's farm by Melvin, which is in Osceola County. Only 35 miles east are the Iowa Great Lakes. It is a shame that there are impaired waters in this region. I believe that CFAOs are large contributors for compromising Iowa's streams and lakes.

I am contacting you today with public comment in regard to the Impaired Waters 303(d) List compiled by the Iowa DNR for 2020, released on December 1.

Having reviewed the information provided, I am concerned about the number of impaired waters in the state and lack of improvement in Iowa's water quality.

Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Jeff Benz  
3010 E Jefferson Ave  
Des Moines, IA 50317

**COMMENTER 111: Matthew McAndrew, private citizen**

**Date Received:** Jan 1, 2021, e-mail

**Comment:**

**Comments on the 2020 Impaired Waters Report**

1 message

Matthew McAndrew <mlagosmcandrew@hotmail.com>  
Reply-To: Matthew McAndrew <mlagosmcandrew@hotmail.com>  
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Fri, Jan 1, 2021 at 7:40 PM

Dear IDNR IR Comments,

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Iowa DNR should prioritize improving Iowa's waters for the benefit of all Iowans.

Thank you,

Sincerely,  
Matthew McAndrew  
906 12th Ave  
Coralville, IA 52241

**COMMENTER 112: Rick Dietz, private citizen**

**Date Received:** Jan 1, 2021, e-mail

**Comment:**

**Draft 2020 List of Impaired Waters**

1 message

Rick Dietz <dietzrs@gmail.com>

Fri, Jan 1, 2021 at 11:15 PM

To: IRcomment@dnr.iowa.gov

January 1, 2020

Iowa Department of Natural Resources

Attn: IR Comments

Wallace State Office Building

502 East 9th Street

Des Moines IA 50319

Email: [IRcomment@dnr.iowa.gov](mailto:IRcomment@dnr.iowa.gov)

RE: Draft 2020 List of Impaired Waters

Dear Water Quality Monitoring and Assessment Section:

I would like to offer the following comments on the draft 2020 list of the Section 303(d) impaired waters list.

As I review the draft impaired waters list a couple of things stand out. One is that the state is making little progress towards improving and protecting our waters, and another is that some of the numbers presented in the summary do not accurately reflect the data. This, together with the state's failure to implement standards for nutrients and microcystins, presents a misleading picture of the condition of our waters.

The 2020 report lists 1,300 water body segments assessed and 750 impairments. That's 58%, compared to 54% in both 2018 and 2016, and is the highest percentage since 2010. Of the 658 waters that were assessed for Primary Recreational Use, 579 (88%) are impaired! I'm a paddler so those A1 designations are especially important to me, but it only gets worse as one takes a closer look at the numbers.

The list of 1,300 assessed segments includes 266 Category 3 segments, waters which were "evaluated" but not assessed. 750 impairments in 1,034 assessed segments comes to over 72%!

That number could be even higher. Just in Story County the list of Category 3 "potentially impaired" waters includes Ballard, Bear and College Creeks, East Indian Creek, Onion & Worrell Creeks, Squaw Creek and Hendrickson Marsh. (The South Skunk and Long Dick Creek are on the Category 5 list.) Squaw Creek has not been assessed by the DNR, but decades of data collected by IOWATER volunteers, samples collected and/or tested by the City of Ames, and samples tested by the State Hygienic Lab leave little doubt about the impairments of Squaw Creek and many of its tributaries.

Finally, the 99 de-listed (Category 4) segments include over 60 waters for which a TMDL has been prepared and approved. Of those 60, 48 had not met the Primary Recreation Standard for E. coli bacteria. It's good to see progress being made with TMDLs, but I think we can assume that those waters are still impaired, and we can expect that they will be impaired until the TMDLs are implemented and have begun to impact water quality. Unfortunately, that's not likely to be anytime soon.

I do appreciate the work of the Water Monitoring and Assessment Section, especially during these times of budget cuts, staff reductions and hiring freezes. You are "only" the messengers. But the message is not



good!

Thank you for your service to the lakes, streams and citizens of Iowa,

Richard Dietz

5782 Felber Street

Ames, Iowa 50010-9240



Comments on the draft 2020 list of the Section 303(d) impaired waters.pdf  
49K

January 1, 2020

Iowa Department of Natural Resources  
Attn: IR Comments  
Wallace State Office Building  
502 East 9th Street  
Des Moines IA 50319  
Email: [IRcomment@dnr.iowa.gov](mailto:IRcomment@dnr.iowa.gov)

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Ames, Iowa 50010-9240