United States Environmental

Protection Agency Region 7

2024 Response to Comments for EPA's Partial Approval/Partial Disapproval of Iowa's Clean Water Act Section 303(d) List of Water Quality Limited Segments Still Requiring TMDLs

JEFFERY ROBICHAUD Digitally signed by JEFFERY ROBICHAUD
Date: 2024.12.30 11:59:24 -06'00'

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Jeffery Robichaud
Director
Water Division

Date

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1. Responses to Comments on the EPA's Partial Approval/Partial Disapproval of Iowa's 2024 303(d) List

A. Conclusion

On November 13, 2024, through December 19, 2024, the U.S. Environmental Protection Agency Region 7 provided an opportunity for public comment on its decision to add seven Water Quality Limited Segments (WQLSs) to Iowa's 2024 Clean Water Act (CWA) Section 303(d) list of impaired waters, pursuant to CWA Section 303(d) and 40 Code of Federal Regulation Section 130.7(d)(2). Regulations implementing CWA Section 303(d) at 40 C.F.R. 130.7(b) and (d)(1) require that states submit, every two (2) years, a list of WQLSs still requiring Total Maximum Daily Loads (TMDLs) within their boundaries for which effluent limitations required by CWA Section 301(b)(1)(A) and (B) are not stringent enough to implement any applicable water quality standard. The EPA must approve or disapprove each list, referred to as a 303(d) list of impaired waters. 33 U.S.C. 1313(d)(2); 40 C.F.R. 130.7(d)(2).

The EPA partially approved Iowa's 2024 303(d) list, approving the state's identification of 705 WQLSs and the removal of 84 WQLSs. However, the EPA disapproved the exclusion of seven WQLSs that the EPA determined are not attaining applicable water quality standards due to exceedance of the nitrate as Nitrogen (N) and nitrate plus nitrite as N criteria, based on the existing and readily available water quality data and information. The seven WQLSs include sections of the Cedar, Des Moines, Iowa, Raccoon, and South Skunk rivers (Table 1). The EPA identified these seven WQLSs for inclusion in Iowa's list pursuant to CWA Section 303(d)(2) and 40 C.F.R. 130.7(d)(2) in its decision document issued on November 12, 2024.

Table 1. Water quality limited segments and parameters added to Iowa's 2024 Clean Water Act Section 303(d) list of impaired waters.

Assessment ID	Assessment Name	Parameter	Data Range	Number of Samples Exceeding 10 mg/L
IA 02-CED-456	Cedar River	Nitrate plus nitrite as N	2020-2022	4
IA 04-LDM-1011	Des Moines River	Nitrate plus nitrite as N	2012-2014	2
IA 04-UDM-1211	Des Moines River	Nitrate plus nitrite as N	2020-2022	8
IA 02-IOW-628	Iowa River	Nitrate as N	2020-2022	13
IA 02-IOW-628	Iowa River	Nitrate plus nitrite as N	2020-2022	3
IA 04-RAC-1116	Raccoon River	Nitrate plus nitrite as N	2020-2022	8
IA 03-SSK-927	South Skunk River	Nitrate plus nitrite as N	2020-2022	2

The EPA promptly issued public notice on the addition of the identified WQLSs, pursuant to 40 C.F.R. 130.7(d)(2), on November 13, 2024, and received 83 responses during the public comment period occurring through December 19, 2024 (Appendix A). A summary of the comments received and the EPA's response to the comments are provided below. The EPA has considered all comments received and hereby affirms its November 12, 2024, addition of seven WQLSs to Iowa's 2024 303(d) list. The seven WQLSs added to Iowa's 2024 303(d) list by the EPA are identified in Table 1. The complete and final Iowa 2024 303(d) list, including the added seven WQLSs, is available in Appendix B and is to be included in the state's water quality management plan. 40 C.F.R. 130.7(d)(2). The rationale for the addition of the seven WQLSs to Iowa's 2024 303(d) list is provided in the EPA's November 12, 2024, decision document for Iowa's 2024 303(d) list.

B. Summary of responses received

Of the comments received, 72 expressed support for the EPA's action adding the WQLSs, three expressed opposition to the EPA's action adding the WQLSs, and eight provided general comments requesting information regarding the EPA's action or not specific to the EPA's action adding the WQLSs. All comments can be found in the Index and Public Comments sections provided in Appendix A.

The EPA thanks the commentors for their time and comments. It is important to note that the EPA only requested comments regarding the addition of the seven WQLSs in Table 1 during the public comment period. Public comments and concerns outside of the purview of the seven WQLSs for this public comment period are acknowledged but not substantively addressed in this response; however, they are noted by the agency and will be transmitted to relevant parties for consideration.

i. Comments that support adding the seven WQLSs

The EPA received numerous comments that expressed support for the listing of the seven WQLSs. In total, 72 of the 83 comments received expressed support for the EPA's action adding the seven WQLSs. Commentors that support the listing of the seven WQLSs include residents of Iowa; public water suppliers, including Des Moines Water Works and Central Iowa Water Works; and environmental and agricultural groups, including Sierra Club, Southeast Iowa Sierra Club, Iowa Alliance for Responsible Ag, Iowa Environmental Council and Environmental Law & Policy Center, Prairie Rivers of Iowa, Expert Tree Consulting, Inc., Jefferson County Farmers & Neighbors, Inc., Technologies of World Peace, and Iowa Citizens for Community Improvement. The Iowa Citizens for Community Improvement comment included over 500 individual names; however, as this was submitted as one comment, the EPA treated it as a single comment.

ii. Comments that oppose adding the seven WQLSs

The EPA received three comments that expressed opposition to the listing of the seven WQLSs. Commentors that oppose the listing of the seven WQLSs include Iowa Farm Bureau Federation (IFBF), Iowa Department of Natural Resources (Iowa DNR), and The Fertilizer Institute (TFI). The IFBF and TFI refer to comments made by Iowa DNR, and all three comment letters oppose the listing based on similar concerns. Therefore, the EPA has considered each of the three comment letters and addresses them below collectively and comprehensively. The EPA also refers the commentors to its April 2, 2024, public comment to Iowa DNR; November 12, 2024, decision document; and November 13, 2024, public notice.

The EPA identified the seven specified WQLSs for inclusion in Iowa's 2024 303(d) list based on its evaluation of existing and readily available data and information, which demonstrates these WQLSs are not attaining Iowa's EPA-approved water quality standards. The EPA acknowledges that state water quality standards, monitoring programs, and assessment approaches vary across states with regard to nitrate as N, nitrate plus nitrite as N, and nitrite as N. Iowa DNR's EPA-approved water quality standards state in Subrule 61.3(3)(c)(2), *Specific water quality criteria*, that "all substances toxic or detrimental to humans or detrimental to treatment process shall be limited to nontoxic or nondetrimental concentrations in the surface water" for streams designated for drinking water use. Of note, nitrate as N, nitrate plus nitrite as N, and nitrite as N are not removed by conventional drinking water treatment processes and are thus detrimental to conventional treatment processes' ability to meet the requirements of the Safe Drinking Water Act without additional treatment when surface water concentrations exceed the Maximum Contaminant Level (MCL). Iowa DNR's EPA-approved water quality standards provide numeric criteria in Subrule 61.3(3) *Specific water quality criteria*, Table 1.

Criteria for Chemical Constituents, for Class "C" protection for nitrate as N at 10 milligrams per liter (mg/L), nitrate plus nitrite as N at 10 mg/L, and nitrite as N at 1 mg/L. These criteria were established by using the EPA's nitrate, nitrate plus nitrite, and nitrite Maximum Contaminant Level Goals.

In identifying the seven specified WQLSs for inclusion in Iowa's 2024 303(d) list, the EPA applied these existing and EPA-approved water quality standards to assess the WQLSs. The EPA's identification of waters pursuant to CWA Section 303(d)(2) and 40 C.F.R. 130.7(d)(2) notably did not establish new water quality standards or impose additional assessment requirements on the state.

As described above, the EPA identified the seven WQLSs by applying these applicable water quality standards to the existing and readily available water quality information and data, including the data collected and assembled by Iowa DNR and publicly available data from the Des Moines Water Works for nitrite. The EPA did not include data in the November 12, 2024, decision document as the data sources the EPA used to identify the seven specified WQLSs are the same sources used and summarized by Iowa DNR in its 2024 303(d) list submission. For all data collected by Iowa DNR, raw data is available through Iowa DNR's AQuIA. For external data assembled and considered by Iowa DNR, the 2024 state submission to the EPA is available to the public through How's My Waterway under the file named '2024 External Data'. Iowa DNR provides data sources, summaries, and statistics to the public on its ADBNet for all 303(d) assessments.

While Iowa DNR cited Des Moines Water Works as the data source it used to assess the Des Moines River (IA 04-UDM-1211; sample location number 99990015) and Raccoon River (IA 04-RAC-1116; sample location number 99990003), it only provided data from Des Moines Water Works for nitrate for these sites in its 2024 303(d) list submission. For its analysis, the EPA also used publicly available nitrite data from the Des Moines Water Works for these same sites. This data is available through the Des Moines Water Works Water Quality Data website. The EPA has provided data that indicates exceedances of Iowa DNR's EPA-approved water quality standards for the identified seven WQLSs in Appendix C of this document. The EPA notes that the regulatory requirements in 40 C.F.R. 130.7(b) and 130.7(b)(6)(ii) referenced by IFBF as the requirements applicable to the EPA's decision to add the seven WQLSs to Iowa's 2024 303(d) list generally outline the regulatory framework for the state's listing submission.

Applying the existing and EPA-approved water quality standards to this data, the EPA determined that the seven identified WQLSs are not attaining the applicable water quality standards associated with the drinking water use, as the data reflect exceedances of nitrate as N and nitrate plus nitrite as N criteria for this use. As noted in Table 1, each of the seven WQLSs included by the EPA in Iowa's 2024 303(d) list demonstrate multiple nitrate as N and nitrate plus nitrite as N exceedances of Iowa's EPA-approved water quality standards.

In acting on Iowa's 2024 303(d) list and identifying the seven specified WQLSs for inclusion in this list, the EPA did not take action to approve or disapprove Iowa's assessment methodology. Rather, the EPA found that the existing and readily available water quality data demonstrate that the seven specified WQLSs are not attaining applicable water quality standards, and the state did not provide a technically defensible rationale in its assessment.

The EPA has routinely, consistently, and clearly indicated the following in its approval of previous Iowa 303(d) lists:

'While the guidelines, protocols, and requirements in state statute and the IDNR [Iowa DNR] listing methodology might be useful tools for the IDNR to use in identifying impaired waters, they are not part of the EPA approved standards. Hence, the EPA did not rely solely on the State's statute or the methodology in reviewing Iowa's list. Instead, the EPA reviewed all available information including any information excluded under the state's methodology, to determine if the state's list was developed consistent with the state's underlying EPA-approved water quality standards. The EPA's review process generally followed a two-step analysis:

1. The EPA reviewed the state's listing methodology, including data collection and data assessment requirements, to determine whether, based on Iowa's EPA-approved water quality standards, the methodology was a reasonable method for identifying water quality limited segments; and
2. Where the EPA was unsure whether the methodology was a reasonable method for identifying water quality limited segments, the Region requested additional information from the IDNR to conduct further water body and data analysis.[1]'

In its April 29, 2022, decision document for Iowa's 2022 303(d) list, the EPA specifically shared the listing issue related to nitrate as N and nitrate plus nitrite as N:

'The EPA had no comments for the changes made to the Iowa DNR's methodology. However, during its review, the EPA determined the methodology and assessment for nitrate in water bodies designated with a Class C drinking water use is not consistent with the Iowa DNR's EPA-approved WQS [Water Quality Standard]. Despite this discrepancy, the EPA verified that this did not impact the listing or removal of water bodies from the Iowa DNR's 2022 CWA Section 303(d) List. In order to comply with their EPA-approved WQS, the Iowa DNR should assess nitrate as a toxic and apply the prescribed maximum.'

As the EPA explained in its November 12, 2024, decision document, it determined that the state did not use existing and readily available data to assess all pollutants with toxic effects with reasonable consideration of the individual pollutant, endpoints, and adverse effects being considered. Pursuant to 40 C.F.R. 130.7(b), states must provide documentation to support their list determinations in their 303(d) list submission, including any decision to not use any existing and readily available data and information. Iowa DNR's application of its 10% binomial exceedance statistical approach does not supply a technically supported rationale for not identifying the seven specified WQLSs on the 303(d) list when the existing and readily available data demonstrate exceedances of applicable criteria for nitrate as N and nitrate plus nitrite as N, as described above. As Iowa DNR's adoption of a 10% binomial exceedance statistical approach appears to be premised on past EPA guidance relating to conventional pollutants,[2] the EPA's discussion of this approach in comments submitted to Iowa DNR on its draft 303(d) list and in the decision document addressed how the Iowa DNR's application of such an approach to nitrate as N, nitrite as N, and nitrate plus nitrite as N is not

[1] EPA approval of the 2016 (January 16, 2018), 2018 (March 24, 2020), 2020 (May 14, 2021), and 2022 (April 29, 2022) Iowa 303(d) lists.
[2] A complete list of conventional pollutants designated pursuant to CWA section 304(a)(4) includes biochemical oxygen demand, total suspended solids, pH, fecal coliform, and oil and grease. 40 C.F.R. 401.16. Pollutants not designated otherwise are categorized as nonconventional pollutants.

consistent with the EPA's aforementioned guidance.[3] However, in noting this, the EPA was not creating assessment requirements based on EPA guidance. Additionally, by acknowledging the human health toxicity of nitrate[4] to evaluate attainment of Iowa DNR's EPA-approved water quality standards in the decision document, the EPA was not taking regulatory action classifying nitrate or changing its status under the CWA, as suggested by the IFBF.

The EPA adhered to all legally applicable requirements in its review of and action on Iowa's 2024 303(d) list and its addition of seven WQLSs to the list, including promptly providing public notice of the addition of the seven WQLSs and seeking and considering comment on this addition pursuant to 40 C.F.R. 130.7(d)(2). As the EPA partially disapproved Iowa's 2024 303(d) list for the exclusion of the seven identified WQLSs that it determined, based on existing and readily available water quality data and information, are not attaining applicable water quality standards, it properly identified these waters for inclusion in Iowa's 2024 303(d) list in accordance with CWA Section 303(d)(2) and 40 C.F.R. 130.7(d)(2). In its action on Iowa's 2024 303(d) list, the EPA did not disapprove any loadings for these waters, and therefore is not required to establish such loadings pursuant to CWA Section 303(d)(2) and 40 C.F.R. 130.7(d)(2).

iii. General comments

The EPA received eight general comments during this public notice. Each is addressed individually due to the varied topics covered. The comments received were from Denise Mathis; Iowa DNR; Iowa Farm Bureau Federation; Matthew McAndrew; Elaine St. Clair; Zita Cashin; Jaiden Shahan; and Mary Johannsen.

Denise Mathis

Denise Mathis provided a phone call received on November 20, 2024. In the call, the commentor requests that the EPA review information for the English River Watershed. As this is not one of the seven WQLSs added to Iowa's 2024 Section 303(d) list, the EPA has no additional comment for this watershed at this time. However, any additional information provided will be considered during the 2026 submission.

Iowa DNR

Iowa DNR requested that the EPA provide information regarding the data sources, data used, list of violations, and methodology used. The data sources used by the EPA in its action are the same as those used by Iowa DNR in its assessment of the waterbodies. The EPA provided a list summarizing violations in its decision document transmitted to the state and has provided additional information in its response to comments.

Iowa Farm Bureau Federation

The Iowa Farm Bureau Federation requested the EPA to extend the public comment period by 30 days. The EPA extended the public comment period by six days, re-scheduling the public comment period to end on December 19, 2024.

Matthew McAndrew

Matthew McAndrew, a resident of Iowa, provides a methodology for nitrate sampling in tile drains and articles regarding nitrate toxicity. The commentor notes that many nitrates come from agricultural sources and

[3] EPA Region 7's 2024 Decision Document for Iowa's Clean Water Act Section 303(d) List of Water Quality Limited Segments Still Requiring TMDLs, November 12, 2024, and Public Comment for Iowa's Draft 303(d) List Submission, April 2, 2024.
[4] 40 C.F.R. Parts 141, 142, and 143, EPA's National Primary Drinking Water Regulations: Final Rule, 1991.

nitrates are toxic to humans. The commentor is concerned about the public's exposure to nitrates and the impact of nitrates in private and public wells. The commentor advocates for source water protection for drinking water supplies.

Elaine St. Clair
Elaine St. Clair, a resident of Iowa, thanks the EPA for its regulatory enforcement and advocates for the use of correct data in protecting the health of Iowans.

Zita Cashin
Zita Cashin, a resident of Iowa, advocates for clean water in Iowa and acknowledges the EPA's action to improve the evaluation of waters in Iowa.

Jaiden Shahan
Jaiden Shahan, a resident of Iowa, advocates for stronger EPA enforcement of the Clean Water Act.

Mary Johannsen
Mary Johannsen, a resident of Iowa, urges the EPA to require Iowa DNR to protect its citizens from polluted waterways.

2. Appendix A: Original Public Comments Received

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B. Public comments

From: Shannon Dox

To: R7-WaterDivision

Subject: Nitrate watch

Date: Friday, November 15, 2024 7:32:22 AM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Greetings! Im a long time resident of des moines and ive been tracking nitrate levels on the des moines river all summer on the Clean Water Hub website. I support the EPA adding more sections of iowa rivers to the list of gross rivers, and any mitigation techniques the EPA suggests. Thank you for supporting clean water.

From: Gaylen Wobeter
To: R7-WaterDivision
Subject: water quality in Iowa
Date: Friday, November 15, 2024 3:38:36 PM

I am a lifelong Iowan and I see how our water quality has deteriorated in my lifetime. Thank you EPA for helping guide Iowa to improvement. I am not a scientist but an educated person, and I do understand some of the particular challenges Iowa has faced with so much agriculture that dominates our state. We need clean water for the health of all living things, including we humans.

From: Harvey Sollberger
To: R7-WaterDivision; Harvey Sollberger
Subject: Rivers of Iowa decision by the EPA
Date: Monday, November 18, 2024 6:54:59 PM

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To the United States Environmental Protection Agency:

I am writing to indicate my very strong support for the EPA's recent actions regarding the nitrate threat to be found in Iowa's rivers. The problem, in fact, extends far beyond the five central Iowa rivers identified by the EPA (the Cedar, Des Moines, Iowa, Racoon, and South Skunk Rivers). I live in northeast Iowa where manure, fertilizer, and pesticide runoff from farmers' uncontrolled activities have compromised a number of our beautiful streams and rivers that run southeast and feed into the Mississippi River (from north to south those rivers are: the Upper Iowa, Yellow, Turkey, Volga, Maquoketa, and Wapsipinicon Rivers).

Iowa's rivers are the most polluted in the country, and as concerns grow regarding the viability of our drinking-water supply and the preservation of our rivers' acquatic life Iowa's state government and its Department of Natural Resources have had their head in the sand for years. Many citizens care - and despair - over the despoilment of our environment for private gain, but our state government and DNR have hardly been guardians of our natural resources. As has been apparent for years, they are in the pocket of monolithic industrial farming, fertilizer and meat-packing interests.

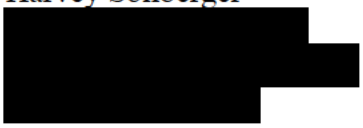
Please, please hold the Iowa DNR's feet to the fire and help our state's many citizens and environmental groups that heretofore have been outgunned by local (and beyond) monied interests that treat our forests, rivers, and soil as if they are their private plantation.

People live here. We live here, and we breathe the air, drink the water, and want to enjoy and protect nature's bounty that we have inherited. Not unrelated to the present despoilment is the fact that the state of Iowa has the highest per capita rate of cancer in the United States. Only connect the dots and see where they lead . . . . back, I think, to the need for action in protecting our environment and natural resources.

I'm 86 years old. My grandfather came to Iowa from Europe in 1892 and was a farmer here his whole life, supporting himself and his family on 30 acres of farmland. It's a whole new ballgame today, and we are losing. Please know that there are many Iowans who share the concerns I've raised in this e-mail, and please help us.

Sincerely,

Harvey Sollberger



From: Patrick Bosold
To: R7-WaterDivision
Cc: "Patrick Bosold"
Subject: Public comment on Iowa"s 2024 303(d) list - add more rivers to it
Date: Tuesday, November 19, 2024 10:11:20 AM

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Dear EPA Region 7 Water Division team,
I support the EPA's proposal to add the Cedar River, Des Moines River, Iowa River, Raccoon River, and South Skunk River to Iowa's 2024 303(d) list of impaired waters. Iowa's Dept. of Natural Resources hasn't been doing its job. These rivers have nitrate and nitrite levels that are hazardous to human health, particularly since waters from these rivers are used for drinking water. The EPA is right to point this out and require the Iowa DNR to add these rivers to its impaired waters list.
If the DNR continues to fail in its responsibilities to Iowans under the Clean Water Act, I ask that the EPA remove Iowa's authority to administer the Clean Water Act.
Thank you,
Patrick Bosold

From: Margaret Dwyer
To: R7-WaterDivision
Subject: Water Quality issues
Date: Tuesday, November 19, 2024 10:34:22 AM

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To whom it may concern:

I support adding the Cedar River, Des Moines River, Iowa River, Raccoon River, and South Skunk River to Iowa's 2024 303(d) list. It is high time this happened!

Sincerely,

Margaret Dwyer

[redacted]

From: Bishop, Gail A
To: R7-WaterDivision
Subject: I approve
Date: Tuesday, November 19, 2024 11:09:14 AM

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Please note that I'm writing to you as a private citizen, not in any official capacity as a University employee. As an Iowa resident, I'm very concerned about Iowa's new status as #2 in the nation for cancer incidence. While I know multiple factors surely contribute to this, our overall poor water quality may be one – and it's one we could do something about. I've long been dismayed that in Iowa compliance with guidelines for agriculture for permitting nitrate and nitrite to enter waterways is entirely voluntary. This is to my mind flagrant disregard for the health of Iowans.

Please do what you can to get our state leaders to act responsibly!! We urgently need and deserve better water quality, and the protection of our waterways for future generations.

Gail A. Bishop, PhD
Professor of Microbiology & Immunology
Holden Chair of Cancer Biology
Assoc. Director for Basic Research, Holden Comprehensive Cancer Center
[redacted], The University of Iowa
Senior Research Career Scientist, Iowa City VA Medical Center
Iowa City, IA 52242
[redacted]

From:	Monk, Steven G
To:	R7-WaterDivision
Subject:	comments concerning the decision to add seven water quality-limited segments to Iowa's 2024 303(d) list
Date:	Tuesday, November 19, 2024 11:37:39 AM

I agree that these segments should be added. I have already given up swimming and fishing in Iowa waters. I still use these waters (after some treatment) to wash dishes and clothes, to bathe, and to drink. And I'd rather keep Iowa's rise in cancer rates from rising further.

Thanks, Steve

From:	Severns, Virginia G
To:	R7-WaterDivision
Subject:	EPA"s Decision on Iowa's 2024 List of Water Quality-Limited Segments Requiring a Total Maximum Daily Load
Date:	Tuesday, November 19, 2024 11:59:59 AM

Hello,

Above all else, thank you all for what you do.

As an Iowa resident whose drinking water is affected by this thank you for asking them to add these waters to their list. Please continue to hold us accountable for improving our water conditions and making the public aware. I know this requires a lot of work and resources for our DNR but public safety is a necessity not a luxury. Of course we do not know that this has any relation to water quality and I am not placing blame anywhere, but I have lost 2 friends under 35 to cancer already and 2 others in the same age bracket have recently had surgery for thyroid cancer. We should be doing what we can to limit the risk of cancer and other illness for everyone.

Thank you,

Ginny Severns
Research Associate, BHRL
University of Iowa
[redacted]

From: Sharon Moss
To: R7-WaterDivision
Subject: Iowa s 2024 303(d) list
Date: Tuesday, November 19, 2024 3:58:21 PM

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I recommend adding the Cedar River, Des Moines River, Iowa River, Raccoon River, and South Skunk River to Iowa s 2024 303(d) list. I am very concerned about Iowa s high cancer rates.

Sharon Moss

From:	trish nelson
To:	R7-WaterDivision
Subject:	Add the 7 segments to Iowa"s 2024 303(d) list
Date:	Tuesday, November 19, 2024 8:40:26 PM

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Dear EPA:

Please add the 7 segments to Iowa's 2024 303(d) list:

- Cedar River for nitrate plus nitrite as N
- Des Moines River – 2 segments – for nitrate plus nitrite as N
- Iowa River – 1 segment for nitrate plus nitrite as N
- Iowa River – 1 segment for nitrite as N
- Raccoon River for nitrate plus nitrite as N
- South Skunk River for nitrate plus nitrite as N

Trish Nelson
[redacted]

From: Zack Jones
To: R7-WaterDivision
Subject: Water quality
Date: Wednesday, November 20, 2024 8:11:32 AM

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I'm becoming conscious about taking a hard stance on information that comes from social media. There are always 2 sides to a story. However, when it comes to
Iowa's water quality it seems very believable that our water is polluted. I say this because of how many water trails we have, how much ground is farmed, lack of buffer strips along water ways, and year after year application of chemicals. I can see this with my own eyes.
I believe run off is a problem especially in wet conditions. If the chemicals persist at the current rate there should be more incentive to reduce run off and continued efforts for better methods. This is in every living beings interest.

From: Mia Morarie
To: R7-WaterDivision
Subject: Clean water
Date: Wednesday, November 20, 2024 8:14:14 AM

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I support adding any and all waterways that qualify to the 2024 303(d) list. I find it shocking that so many people who live off the land, treat it so abhorrently, bending and twisting laws and regulations until they are unrecognizable and go unenforced and violations go unpunished, or get a slap in the wrist for major violations. It's downright shameful.

Red Oak, IA

From: Billy Hunter
To: R7-WaterDivision
Subject: polluted creeks and rivers here in Iowa
Date: Wednesday, November 20, 2024 10:20:02 AM

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

We live next to the Cedar River (creek here in Center Township Jefferson County IA), and because of all the significant agricultural effluent from farm chemicals and manure runoff, the river (creek) is a dead zone, and disgusting.

Therefore, we support adding the Cedar River, Des Moines River, Iowa River, Raccoon River, and South Skunk River to Iowa's 2024 303(d) list.

Billy Hunter
[redacted]

From: Ryan Reynolds
To: R7-WaterDivision
Subject: Iowa Rivers
Date: Wednesday, November 20, 2024 1:46:51 PM

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear EPA,

I live along the Iowa River so I heartily support adding the Cedar River, Des Moines River, Iowa River, Raccoon River, and South Skunk River to Iowa's 2024 303(d) list of impaired waters.

All people deserve clean water and what the Iowa DNR is doing is immoral. Please help us stand up to Big Ag and a complicit state government.

Thank you,
Ryan Reynolds
[redacted]

From: Abigail Bohle
To: R7-WaterDivision
Subject: Iowa waters 303
Date: Wednesday, November 20, 2024 1:49:21 PM

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern:

As an Iowan for my whole life, I am devastated by how lax the DNR has become with our drinking water. Please add those rivers to the list. They need to be called out and made to enforce laws that have been in place for years. They need to do better, especially with the high cancer rates for Iowa.

Thank you,
Abigail Bohle

From: Johanson, Roger
To: R7-WaterDivision
Subject: Iowa Rivers
Date: Wednesday, November 20, 2024 3:35:56 PM

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

We are drinking dirty water. Please add these rivers in Iowa's 2024 303(d) list the Cedar River, Des Moines River, Iowa River, Raccoon River, and South Skunk River.
Thank you. Water is everyone's lifeline.
Roger

--
Roger Johanson
Professor Emeritus, Coe College
[redacted]

From: Carl Osterhoudt
To: R7-WaterDivision
Subject: Iowa impaired waterways
Date: Wednesday, November 20, 2024 6:25:12 PM

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern,

I am writing to express my support for adding the Cedar River, Des Moines River, South Skunk River, and Raccoon River to Iowa's 303d list. Without intervention, these waterways will continue to decline. Please do what you can to help address this issue.

Thank you,

Carl J Osterhoudt
Iowa native since 1987

From: Zepeski, Anne E
To: R7-WaterDivision
Subject: Iowa"s 2024 303(d) list of impaired waters
Date: Wednesday, November 20, 2024 6:44:58 PM
Attachments: image001.png

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hello,

As a resident of Iowa, parent, and health care provider, I support adding the Cedar River, Des Moines River, Iowa River, Raccoon River, and South Skunk River to Iowa's 2024 303(d) list of impaired waters.

Thank you,

Anne Zepeski

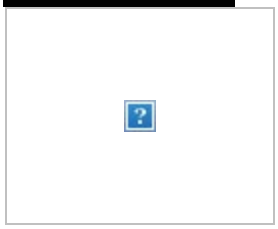
Anne Zepeski, PharmD, BCPS

Clinical Assistant Professor, Emergency Medicine

Clinical Assistant Professor, Pharmacy Practice

University of Iowa Health Care

[redacted]



From:	john Norwood
To:	R7-WaterDivision
Subject:	Decision to Add 7 water quality segments to Iowa's 2024 303(d) List
Date:	Wednesday, November 20, 2024 9:05:55 PM

Dear EPA:

I am a West Des Moines resident and frequent paddler on central Iowa rivers including the Des Moines and Raccoon Rivers. My drinking water provider draws source water from these two rivers.

I am supportive of the EPA decision to add these seven water quality-limited segments to Iowa's 2024 303(d) list.

It is clear the existing state Nutrient Reduction strategy is not working. The primary reason is the scale of activities necessary to mitigate the increase in nutrient loads is far to slow and far too small to account for the nitrate and nitrite levels resulting from millions of corn acres and the manure from millions of livestock.

We need a serious plan which includes establishing carrying capacities for crops and livestock by river segments with robust river level monitoring and management. We also need mandatory buffer setbacks along streams and waterways and crop rotation and cover crops tied to crop insurance eligibility. Previously the state's soil and water commissioners recommended such setbacks, but the current Agriculture Secretary Mike Naig used his administrative power to block such action either administratively or legislatively.

Corn-on-corn rotations should be penalized by eliminating eligibility for crop insurance for fields using this practice. Third crop rotation like small grains, such as food grade oats should be rewarded. These crops require less fertilizer than corn, can utilize manure during warmer growing season months, and build soil health- perhaps the fastest and best way to reduce nutrient loss and retain soil moisture.

EPA should work closely with the USDA and state level IDALS to develop strategies, timelines, goals and identify resources to protect these rivers and vital sources of drinking water, biodiversity, groundwater recharge and flood protection.

Thank you,

John Norwood

West Des Moines, Iowa

From: maribeth newman
To: R7-WaterDivision
Subject: Nitrates in Rivers
Date: Wednesday, November 20, 2024 10:28:58 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Thank you for insisting that Iowa finally address the high nitrates in our rivers. Our corporate agricultural system makes it difficult for farmers to operate without excess nitrogen application. The numbers of CAFOS create an obscene amount of animal waste, thus more nitrogen .The entire state is laced with a drainage pipeline system that deprives the land of natural water retention and recharging. Our increasing cancer rate is the canary in the coal mine of Iowans' health related to our sick land and water management. Our state government is not functioning to protect Iowans but to serve corporate agriculture, some international. Thank you for standing up for us.
Maribeth Newman
[redacted]

Sent from my iPhone

From: Greg Nepstad
To: R7-WaterDivision
Subject: PLEASE DO ADD THEM
Date: Wednesday, November 20, 2024 11:33:32 PM

Add the Cedar, Des Moines, Iowa, Raccoon, & South Skunk to Iowa's 2024 303(d) list. They are basically sewers.
Greg Nepstad, Stuart, Iowa

From: Pratt, David
To: Paxson, Chelsea (she/her/hers)
Subject: Iowa Voice Message
Date: Thursday, November 21, 2024 8:59:15 AM
Attachments: 13194306557_17634801764020413025.amr

Did Amy forward this to you? I received a voice message and not sure if we should call back now or wait until all are received. Either way, they bring up a point that we'll need to look in to. Thanks

(11/20/24, 7:54 PM) Hi Mister Pratt, this is Denise Mathis, and I am from Iowa. I had read the letter that you had that your office had sent to Iowa's DNR, and I would ask that you also look at the English River watershed. Um, the English River watershed was also part of an NIH grant. That um we were awarded. Several years ago, and they did have money, we were able to test the English river at that particular time. And uh if you check out the English River watershed. Uh, website, you will see the conclusion of a lot of the water tests that we did all the way through the river from Grinnell all the way to English Valley. Um, I am also going to send an email regarding how bad I think the DNR in Iowa is doing fighting the nitrate levels in Iowa, um, but if you want to call me back, I can put you in touch with the administrator for the English River watershed. Um, her name is Jody. And Her phone number? I, um, let me find it really quick. I'm so sorry I didn't have it ready. Um, her name is Jody Bailey and her phone number is [redacted]. She was the administrator on the English River watershed, and if you want to get in touch with me, my number is [redacted]. I just wanted you guys to know that um we had also done. Some water testing and how bad our water testing turned out. OK, thank you.

David Pratt, Section Supervisor
U.S. Environmental Protection Agency, Region 7
Water Division
Standards and Water Quality Branch
Water Quality Section
Office: 913-551-7552
[redacted]

From: Peggy Eherenman
To: R7-WaterDivision
Date: Thursday, November 21, 2024 3:39:08 AM

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Please add the Cedar River, in Iowa, and some other rivers to your list of rivers that need to be cleaned of nitrites and nitrates. Little has been accomplished toward this end in many, many years and we need EPA to step in. PLEASE! Thank you, - Peggy Eherenman, [redacted]

From: Dhyana Kaufman
To: R7-WaterDivision
Subject: Iowa RiVers
Date: Thursday, November 21, 2024 10:29:43 AM

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I strongly support the adding of the: Iowa, Cedar, Des Moines. South Skunk, and Raccoon Rivers to the EPA's list of Impaired Rivers and to direct the Iowa DNR to follow the regulations set forth in the Clean Waters Act to protect these vital waterways in our state. It is shameful that the DNR has failed at its job to protect these waters (and others) for the abuses of Big Ag and Big Meat. Action must be taken.

Dhyana Kaufman
[redacted]

From:	Krier, Ken
To:	Paxson, Chelsea (she/her/hers); Pratt, David
Cc:	Kendall, Daniel; Moeller, Mark [DNR]
Subject:	Fwd: FW: Partial Approval/Partial Disapproval of Iowa's 2024 Section 303(d) List
Date:	Thursday, November 21, 2024 1:42:23 PM
Attachments:	IA2024.303d.PartialDisapprovalLetter_DecisionDocument11.12.2024.pdf

Mr Pratt,

It is Iowa DNR's intention to comment on the six segments (seven impairments) EPA R7 intends to add to Iowa's 2024 Section 303(d) List by December 12, 2024. To facilitate Iowa DNR's response/comment, please provide the following information to Iowa DNR as soon as possible:

- the data sources (agency, database, etc.) for the data used to assess the Class C designated uses from the six segments/assessment units
- all the data used to assess the Class C designated uses from the six segments/assessment units
    - the data should include: sample date, site number, site name, method, laboratory, parameter name, result, unit, latitude, and longitude
- list of violations calculated from the data
- methodology used for assessment determination

Thanks in advance for your prompt attention to this request.

Regards,
Ken

Ken Krier
Environmental Specialist Senior
Water Quality Monitoring and Assessment Section
Department of Natural Resources
6200 Park Ave, Suite 200
Des Moines, IA 50321
[redacted]
https://www.iowadnr.gov/

DNR logo

---------- Forwarded message ---------

From: Melanie T
To: R7-WaterDivision
Subject: Iowa Rivers
Date: Thursday, November 21, 2024 8:29:20 PM

Dear Environmental Protection Agency:

Please ensure the Department of Natural Resources includes the following Iowa rivers on the 2024 303(d) list: Cedar, Des Moines, Raccoon, Iowa, South Skunk. It is no wonder, since so many poor pigs and chickens are crammed in buildings on Iowa lands, that the waste produced gets into our drinking water. The DNR needs to correctly report these rivers on this year's list based on the evidence, and as an Iowan, I would greatly appreciate your help in facilitating this.

Thank you so much for your assistance!
Melanie Tipton

From:	Shawn Richmond
To:	Pratt, David; Paxson, Chelsea (she/her/hers)
Cc:	Robichaud, Jeffery; Christina Gruenhagen; Matt Steinfeldt; R7-WaterDivision
Subject:	FW: Comment period extension request
Date:	Friday, November 22, 2024 9:47:36 AM
Attachments:	image001.jpg

Hello David and Chelsea – I'm forwarding you the request below from Iowa Farm Bureau for a 30-day extension on the comment period for the seven water segments EPA has proposed for addition to Iowa's 2024 impaired waters list.

Please let me know that you have received our request and advise at your earliest convenience if the extension request will be granted.

Thank You

Shawn Richmond
Conservation & Natural Resources Policy Advisor
Iowa Farm Bureau Federation
5400 University Avenue | West Des Moines, IA 50266
[redacted]

From: Shawn Richmond
Sent: Monday, November 18, 2024 1:42 PM
To: robichaud.jeffery@epa.gov
Subject: Comment period extension request

Hi Jeff – It was good to see you on the tour with Bruno back in September, hope things have been going well since.

I see that EPA has opened a public comment period regarding EPA's partially approve/partially disapprove decision on Iowa's 2024 303(d) list. Given the time needed to go through the decision in detail and the comment period overlapping Thanksgiving, Iowa Farm Bureau requests that the comment period be extended by 30 days to provide sufficient time for public comment on this matter. Please advise if this email will suffice for a formal request to extend the comment period, and if not please advise how to proceed with a formal request.

Thanks!

Shawn Richmond
Conservation & Natural Resources Policy Advisor
Iowa Farm Bureau Federation
5400 University Avenue | West Des Moines, IA 50266
[redacted]

From:	Gloria Foster
To:	R7-WaterDivision
Subject:	Adding the Cedar River, Des Moines River, Iowa River, Raccoon River and South Skunk River to Iowas"s 2024 303(d) list
Date:	Friday, November 22, 2024 7:23:56 PM

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I support adding the Cedar River, Des Moines River, Iowa River, Raccoon River and South Skunk River to Iowa's 2024 303(d) list. I fervently hope this will actually lead to getting something done about all our impaired lakes and rivers.

Thank you,
Gloria Foster

Gloria W. Foster
[redacted]

From: Ed Fischer
To: R7-WaterDivision
Subject: EPA"s Decision on Iowa's 2024 List of Water Quality-Limited Segments Requiring a Total Maximum Daily Load
Date: Saturday, November 23, 2024 3:58:53 PM

To whom it may concern:

I agree with the EPA's assessment that the river segments listed in Table 1 (letter to the Iowa Department of Natural Resources, https://www.epa.gov/system/files/documents/2024-11/ia2024.303d.particialdisapprovalletter_decisiondocument11.12.2024.pdf) be included in Iowa's 2024 303(d) list. Four of the segments are drinking water sources for 3 of Iowa's large population centers (Des Moines, Cedar Rapids, and Iowa City. The water suppliers for these centers must go to great expense to keep nitrate/nitrite levels low in their potable water.

Thank you.

Ed Fischer
[redacted]

From:	Matthew McAndrew
To:	R7-WaterDivision
Subject:	Public comment to EPA ruling in regards to nitrates in rivers in Iowa
Date:	Monday, December 2, 2024 8:54:10 AM
Attachments:	NITRATE TOXICITY ARTICLES AND WEBSITES.docx water-quality-report (2).pdf MONITORING NITRATES IN TILE OR SURFACE WATER.Curr.Standards. (4).docx

To Whom it may concern:

This email will not address river/surface water nitrates alone but more so in a wholistic sense. I monitor nitrates in tiles and have perfected a process to determine nitrates in the field using Hach nitrate/nitrite strips and colorimetric cards and phone app from Deltares of the Netherlands. (see Monitoring Nitrates in Tiles attached)

The monitoring of tile water is only an indicator of nitrate levels since it is only for a day. But to realize the levels and act upon them the producer can better regulate and apply any other nitrates in the field.

To reduce the levels of nitrates in Iowa Rivers we need to address agriculture contributions (45% fertilizer and 14% from manure and 27% from legumes). These numbers come from estimates from IDNR several years ago as part of a water restoration plan for the Cedar River. The plan was abandoned two years ago.

Nitrates are water soluble and thus they move through the soil profile quickly and easily. These chemicals are necessary for the growth of cultivated plants such as corn.

Yet, as beneficial as nitrate to the plant this nutrient is toxic to humans. A number of articles indicating the toxic conditions of nitrates are found on the attached ("Nitrate Toxicity Articles and websites")...Exposure to nitrates in drinking water can be harmful.

In a report done several years ago, findings of the effects of fertilizer applications on draw down areas of small town public wells indicate that the protection of these areas was not being done successfully. (see water quality report)

---

nitrate-nitrite-background-document.pdf

In the World Health Organizations report on nitrates there are health issues sited with blue baby syndrome or Methaemoglobinaemia and thyroid tumors and birth defects. The chronic effects if allowed will act as an insidious disease for the population consuming nitrates at variable levels. Not enough research has been done to determine the long term effects of nitrates. In Iowa, private and public well water is at risk of some level of nitrate unless certain restrictions/regulations are put in place. Small towns must be given support to put these controls in place. Source water protections are absolute.

We must attempt to regulate/measure nitrates in the environment. This would include urban as well as rural sources. All landowners should be educated of the ills of nitrates and held responsible to monitor nitrate levels. (use the Deltares method).

I hope this is helpful in your work to limit toxins in the environment.
Peace,
Matthew McAndrew
Owner/Manager
MB Water
[redacted]

From:	Pamela Mackey Taylor
To:	R7-WaterDivision
Subject:	Iowa"s 2024 303(d) list comments
Date:	Monday, December 2, 2024 3:19:05 PM
Attachments:	impairedH2O.pdf

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Attached are comments from the Iowa Chapter of the Sierra Club about the 2024 Section 303(d) list and adding 7 water quality limited segments to the list.

Thank you for considering these comments.

Pam Mackey Taylor
Iowa Chapter Director

SIERRA CLUB
IOWA CHAPTER

December 2, 2024

Environmental Protection Agency, Region 7
Water Division
Via email to R7-WaterDivision@epa.gov

Re: Comments concerning Iowa's 2024 Section 303(d) list and 7 water segments being added to the list

Dear Water Division Staff:

Sierra Club Iowa Chapter is the oldest and largest grassroots environmental organization in Iowa. We have approximately 7,000 members throughout the state. Sierra Club has been a leader in Iowa on addressing issues surrounding water quality. So we appreciate the opportunity to comment on the proposed revisions to the 2024 Section 303(d) list.

The Sierra Club supports adding the 7 water quality limited segments to the 303(d) list identified in your November 12, 2024, letter to Ed Tormey at the Iowa Department of Natural Resources (DNR). The 7 segments include portions of the following rivers and involve nitrate and nitrite pollution:

- Cedar River
- Des Moines River
- Iowa River
- Raccoon River
- South Skunk River

We also support the EPA's analysis of the Iowa Department of Natural Resources processes and methods of determining whether a water should be listed on the Section 303(d) list, including:

- The DNR did not use the Iowa Water Quality Information System data, including information from the U.S. Geological Survey and the University of Iowa's Iowa Institute for Hydrologic Research monitors. This data is credible and collected by professionals dealing with water quality issues. Iowa DNR should be required to use the information in formulating the 303(d) list.
- The DNR did not use information in the Clean Water Hub. This information is collected by trained volunteers. Iowa DNR should be required to use the information in formulating the 303(d) list.
- We support the EPA's analysis that says that "data excluded from the state's analysis must be based on a technical, science-based rationale and not rely solely upon Iowa's 'Credible Data Law'". DNR has been able to use the credible data law to hide the fact that some waters is Iowa are polluted and need to be put on the 303(d) list. The Credible Data Law has allowed DNR to keep the 303(d) list shorter than it should be. It therefore allows polluters to keep polluting.
- We support EPA's analysis that the DNR should not be using the 10% rule to determine if a water body is polluted with nitrate and N, nitrite as N, and nitrate plus nitrite as N. Given that excess amounts of nitrate and nitrite can be injurious to human health, the toxic levels of those substances should force a water body of the 303(d) list.
- In the letter to Ed Tormey and the decision document, EPA noted that they alerted the DNR that the DNR is "not assessing all pollutants with toxic effects with reasonable consideration of the

individual pollutant, endpoints, and adverse effects being considered" in their comment letter about the draft 303(d) list. It is disappointing to know that DNR chose to ignore those comments and did not list the 7 water quality limited segments on the 303(d) list submitted to DNR.

- We support the EPA looking into how the DNR is prioritizing those waters on the 303(d) list for development of TMDLs. We have concerns about how long waters are on the list without a TMDL. We are concerned with the Outstanding Iowa Waters being given lower priority on TMDL development.
    - On the current 303(d) list are numerous water segments that have been on the list since 2006 and 2008, with no TMDL having been prepared.
    - Some of those waters on the list since 2006 and 2008 are designated as Outstanding Iowa Waters pursuant to Iowa's Antidegradation Policy. These waters are entitled to extra protection.
    - Just as troubling as the many years these Outstanding Iowa Waters have been on the list is the fact that DNR has designated them as low priority for preparing TMDLs. They have been designated as Tier III and Tier IV, putting them at the bottom of the priority list, essentially condemning them to perhaps never having a TMDL prepared. This is a clear violation of the intent, if not the specific language, of the Clean Water Act. Section 303(d) says the priority ranking must be made "taking into account the severity of the pollution and the uses to be made of such waters." 33 U.S.C. § 1313(d)(1)(A).
- Finally we are concerned that the DNR is not fully implementing the plans to improve water quality that have been identified as part of the TMDL process. Given efforts by the state to reduce income taxes and the programs supported by those taxes, it appears that the TMDLs will not be implemented any time in the near future. The process of listing a water on the 303(d) list should result in water quality improvement in the near future. The 303(d) list and the TMDLs mean nothing if the TMDLs are not implemented.

The state of Iowa needs to come to grips with the excessive amounts of nitrate and nitrite that are entering the water bodies in the state. Along with that, efforts need to begin for setting water quality standards for nutrients. Plus the state needs to undertake serious efforts to reduce the nutrients entering water bodies, through the TMDL process. Iowa's voluntary Nutrient Reduction Strategy is not working in reducing nutrients in the state's waters.

As I said above, the Sierra Club supports adding the 7 water quality limited segments to the 2024 303(d) list.

Sincerely,

/s/ Pamela Mackey Taylor

Pamela Mackey Taylor
Iowa Chapter Director
PO Box 1058
Marion, IA 52302
[redacted]

From: Mike Tramontina
To: R7-WaterDivision
Subject: Iowa Impaired Waters List 2024
Date: Tuesday, December 3, 2024 9:55:58 AM
Attachments: 2024-12-03 Letter on Impaired Waters.docx

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Environmental Protection Agency, Region 7

Water Division

Mike Tramontina

[redacted]

"Some white people hate black people, and some white people love black people, some black people hate white people, and some black people love white people. So you see it's not an issue of black and white, it's an issue of Lovers and Haters."
eden ahbez

December 2, 2024

Environmental Protection Agency, Region 7
Water Division
Via email to R7-WaterDivision@epa.gov

Re: Iowa's 2024 Section 303(d) list and 7 water segments being added

Dear Water Division Staff,

I appreciate the opportunity to comment on the proposed revisions to the 2024 Section 303(d) list. I support adding the 7 water quality limited segments to the 303(d) list identified in your November 12, 2024, letter to Ed Tormey at the Iowa Department of Natural Resources (DNR). The 7 segments include portions of the following rivers and involve nitrate and nitrite pollution: • Cedar River • Des Moines River • Iowa River • Raccoon River • South Skunk River.

I support the EPA's analysis of the Iowa Department of Natural Resources processes and methods of determining whether a water should be listed on the Section 303(d) list, including:
• The DNR did not use the Iowa Water Quality Information System data, including information from the U.S. Geological Survey and the University of Iowa's Iowa Institute for Hydrologic Research monitors. This data is credible and collected by professionals dealing with water quality issues. Iowa DNR should be required to use the information in formulating the 303(d) list.
• The DNR did not use information in the Clean Water Hub. This information is collected by trained volunteers. Iowa DNR should be required to use the information in formulating the 303(d) list. • We support the EPA's analysis that says that "data excluded from the state's analysis must be based on a technical, science-based rationale and not rely solely upon Iowa's 'Credible Data Law'". DNR has been able to use the credible data law to hide the fact that some waters is Iowa are polluted and need to be put on the 303(d) list. The Credible Data Law has allowed DNR to keep the 303(d) list shorter than it should be. It therefore allows polluters to keep polluting.
• I support EPA's analysis that the DNR should not be using the 10% rule to determine if a water body is polluted with nitrate and N, nitrite as N, and nitrate plus nitrite as N. Given that excess amounts of nitrate and nitrite can be injurious to human health, the toxic levels of those substances should force a water body of the 303(d) list.
• In the letter to Ed Tormey and the decision document, EPA noted that they alerted the DNR that the DNR is "not assessing all pollutants with toxic effects with reasonable consideration of the individual pollutant, endpoints, and adverse effects being considered" in their comment letter about the draft 303(d) list. It makes me angry that DNR chose to ignore those comments and did not list the 7 water quality limited segments on the 303(d) list submitted to DNR.
• I support the EPA looking into how the DNR is prioritizing those waters on the 303(d) list for development of TMDLs. I am concerned about how long waters are on the list without a TMDL. I am concerned with the Outstanding Iowa Waters being given lower priority on TMDL development. On the current 303(d) list are numerous water segments that have been on the list since 2006 and 2008, with no TMDL having been prepared. Some of those waters on the list since 2006 and 2008 are designated as Outstanding Iowa Waters pursuant to Iowa's Antidegradation Policy. These waters are entitled to extra protection.

Just as troubling as the many years these Outstanding Iowa Waters have been on the list is the fact that DNR has designated them as low priority for preparing TMDLs. They have been designated as Tier III and Tier IV, putting them at the bottom of the priority list, essentially condemning them to

perhaps never having a TMDL prepared. This is a clear violation of the intent, if not the specific language, of the Clean Water Act. Section 303(d) says the priority ranking must be made "taking into account the severity of the pollution and the uses to be made of such waters." 33 U.S.C. § 1313(d)(1)(A).

- I am concerned that the DNR is not fully implementing the plans to improve water quality that have been identified as part of the TMDL process. Given efforts by the state to reduce income taxes and the programs supported by those taxes, it appears that the TMDLs will not be implemented any time in the near future. The process of listing a water on the 303(d) list should result in water quality improvement in the near future. The 303(d) list and the TMDLs mean nothing if the TMDLs are not implemented.

The state of Iowa needs to come to grips with the excessive amounts of nitrate and nitrite that are entering the water bodies in the state. Along with that, efforts need to begin for setting water quality standards for nutrients. Plus, the state needs to undertake serious efforts to reduce the nutrients entering water bodies, through the TMDL process. Iowa's voluntary Nutrient Reduction Strategy is not working in reducing nutrients in the state's waters.

Finally, I support adding the 7 water quality limited segments to the 2024 303(d).

Mike Tramontina
[redacted]

From: Bridget McNerney
To: R7-WaterDivision
Subject: Iowa Impaired waterways
Date: Tuesday, December 3, 2024 1:31:46 PM

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Please retain the additional 7 waterways that Iowa DNR neglected to include in the impaired waterways inventory. The citizens have no voice in the process and our requests to clean up the water go without state action. We voted as a state to fund conservation and clean up through a sales tax increase and the Legislature has thus far failed to use the dollars designated for this purpose to be placed into the fund.

While you are at it, have Region 7 air reject the states newly imposed 40% opacity standard on the locals and force them to rewrite their code to embrace the 20% opacity that we have now had to give up in Polk and Lynn Counties.

Thank you
Bridget McNerney

From: Maria La france
To: R7-WaterDivision
Subject: Please add 7 waterways to Iowa"s Impaired Waters List 2024
Date: Tuesday, December 3, 2024 8:05:21 PM

Please add the 7 Iowa water ways to the 2024 303(d) List of Iowa Impaired Waters that the Iowa DNR reported in 2024. The waterways include key segments of the Des Moines, Cedar, Iowa, Raccoon and South Skunk rivers from which hundreds of thousands of Iowans draw drinking water.

Maria La France
[redacted]

From: Robert Riley
To: R7-WaterDivision
Subject: iowa Impaired Waters
Date: Tuesday, December 3, 2024 9:08:52 PM

I would encourage you to list the 7 additional river sections in the impaired water list.

The sooner we can name and identify the issues, the sooner we can attempt to fixc them.

It is apparent that Iowa DNR has no interest in naming or fixing any of our impaired waters.

Therefore, should EPA take over enforcement of Iowa environmental protection? YES

R G Riley, Jr

[redacted]

Stay safe, let's be careful out there, keep your distance!

Brevity is worth the effort.

From:	Anne Walton
To:	R7-WaterDivision
Subject:	Comment on Decision Document for Ipwa"s 2024 Impaired Waters List
Date:	Thursday, December 5, 2024 4:58:24 PM
Attachments:	SEISC"s Comments on Impaired Waters.docx

TO: EPA-R7, Water Division

FROM: SE Iowa Sierra Club, Fairfield, Iowa

RE: Iowa Impaired Waters, Clean Water Section 303d List

DATE: December 02, 2024

To Whom it May Concern:

Please record this as a public comment on The EPA's Decision Document on Iowa's 2024 List of Impaired Waters, comment period open until December 13, 2024.

on behalf of the Executive Committee of the SE Iowa Sierra Club (SEISC) group, whose geographic range includes eight counties in SE Iowa, we support the EPA's decision to add five water bodies to Iowa Department of Natural Resources (DNR) 2024 list of Impaired Waters. The addition of the Cedar River, Des Moines River, Iowa River, Racoon River and the South Skunk River would better reflect a complete list of Iowa's Impaired Waters due to the fact that numerous water samples show these water bodies to exceed the federal water quality standard for surface waters used for drinking water. This deficit in the list of Iowa's Impaired Waters is a significant finding on behalf of EPA, and even more so, a finding that leads to the need to develop and execute a pollutant reduction plan that will take specific action to reduce the nitrate and nitrite loads of each of these five rivers.

The development of a Total Maximum Daily Load (TMDL) and any meaningful restoration plan for each of these water bodies will require DNR to address the source of the problem. With 95% of Iowa's total land mass under agricultural production, the largest contributing factors to the Impaired Waters in our state are manure and commercial fertilizer that is transported through different forms of precipitation from our agricultural lands to surface water (and likely ground water) systems. This will require DNR to work closely with Iowa's largest economic driver to address their farming practices. It will also require DNR, as EPA suggested, to change their water quality monitoring interpretation of the data. Instead of using a statistical method that amortizes pollutant levels across a series of data points, DNR must evaluate and report the results of each test of nitrate, nitrite, or nitrate plus nitrite that exceeds the water quality standard established by EPA. Additionally, the test data source (e.g. volunteer data) needs to be sorted from the scientific data.

All of this leads to another issue cited in the Iowa Sierra Club's De-delegation Petition in which they requested that Iowa DNR's public trust authority to administer the Clean Water Act be rescinded. The Executive Committee of the SE Iowa Sierra Club concurs with this request as supported by the earlier statements made in this public comment document. Although our comments above speak to what is happening in 2024, DNR's history of negligence actually

goes back to at least 2006 and 2008, the time span for which some of the water bodies have been on the Impaired Waters list, and DNR still has yet to establish TMDLs. Worth noting is the fact that some of these water bodies are designated as Outstanding Iowa Waters, which actually entitles them to extra levels of protection.

In conclusion, the SE Iowa Sierra Club group's Executive Committee kindly requests that EPA ensure that Iowa's DNR completes its 2024 List of Impaired Waters to include at least five polluted water bodies mentioned above. And, with these additions, provide oversight to ensure that TMDLs are established for all of Iowa's Impaired Waters, along with restoration plans. If the Iowa DNR cannot follow through with its public trust responsibilities in regards to the Clean Water Act, then that delegated authority should be taken back by the EPA and reassigned appropriately.

Thank you for your consideration of our comments.

Kind regards

Anne Walton, Chair

On Behalf of the SE Iowa Sierra Club group Executive Committee

TO: EPA-R7, Water Division
FROM: SE Iowa Sierra Club, Fairfield, Iowa
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Thank you for your consideration of our comments.

Kind regards
Anne Walton, Chair
On Behalf of the SE Iowa Sierra Club group Executive Committee

From: Ryan Koch
To: R7-WaterDivision
Subject: seven impairments to Iowa's 2024 Impaired Waters List
Date: Saturday, December 7, 2024 2:45:43 PM

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

It has come to my attention, through the work of the Iowa Environmental Council, that the EPA intends to include additional segments of some Iowa rivers to the Impaired Waters list. I am fully in favor of adding these designations to these rivers as these rivers, including the Iowa, Des Moines, Cedar, South Skunk, and Raccoon rivers are very critical interior rivers in Iowa that are valuable to me personally. Along with this, my interactions with other anglers and recreational users of these waters suggest that these waters deserve to be monitored closely to prevent any further impairment from agriculture, and our state wildlife agency (DNR) has a shady record of pushing business and agricultural interests instead of clean water as required by the Clean Water Act. Particularly in the area of the state where these rivers flow, agricultural interests have not worked for the best interests of the states citizens and clean water in the previous decades.

Thank you for holding our state agency accountable to allowing our interior Iowa rivers to run clean and natural routes through our state. I fully support the EPA in requiring additional waters being added to the Impaired Waters list and holding our state accountable to monitor our waters and work in the interest of our states citizens to allow our rivers to run clean.

Ryan Koch

From: Elaine StClair
To: R7-WaterDivision
Subject: Iowa DNR must be held to the regulations
Date: Sunday, December 8, 2024 9:31:54 AM

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Thank you for being the enforcement of regulations for safe water in Iowa and the country. The health of citizens of Iowa depends on EPA's ability to enforce the rules to provide correct data on which decisions are made.

Elaine St Clair
[redacted]

From:	Richard Dietz
To:	R7-WaterDivision
Subject:	Re: Iowa's 2024 Section 303(d) list
Date:	Sunday, December 8, 2024 11:22:38 AM

December 8, 2024

Environmental Protection Agency, Region 7
Water Division
Via email to R7-WaterDivision@epa.gov

Re: Iowa's 2024 Section 303(d) list

Dear Water Division Staff,

Thank you for the opportunity to comment on Iowa's 2024 Section 303(d) list. I strongly support the addition of seven river segments to the 303(d) list that are identified in your November 12 letter to the Iowa Department of Natural Resources (DNR). Those segments (parts of the Cedar, Des Moines, Iowa, Raccoon and South Skunk Rivers) serve as drinking water sources for hundreds of thousands of Iowan's while having levels of Nitrate that exceed the drinking water standard.

I support the EPA's analysis of the Iowa Department of Natural Resources processes and methods of determining whether a water should be listed on the Section 303(d) list, including:
· The DNR did not use the Iowa Water Quality Information System data, including information from the U.S. Geological Survey and the University of Iowa's Iowa Institute for Hydrologic Research monitors. This data is credible and collected by professionals dealing with water quality issues. Iowa DNR should be required to use the information in formulating the 303(d) list.
· The DNR did not use information in the Clean Water Hub. This information is collected by trained volunteers. Iowa DNR should be required to use the information in formulating the 303(d) list. · We support the EPA's analysis that says that "data excluded from the state's analysis must be based on a technical, science-based rationale and not rely solely upon Iowa's 'Credible Data Law'". DNR has been able to use the credible data law to hide the fact that some waters in Iowa are polluted and need to be put on the 303(d) list. The Credible Data Law has allowed DNR to keep the 303(d) list shorter than it should be. It therefore allows polluters to keep polluting.
· I support EPA's analysis that the DNR should not be using the 10% rule to determine if a water body is polluted with nitrate and N, nitrite as N, and nitrate plus nitrite as N. Given that excess amounts of nitrate and nitrite can be injurious to human health, the toxic levels of those substances should force a water body of the 303(d) list.
· In the letter to Ed Tormey and the decision document, EPA noted that they alerted the DNR that the DNR is "not assessing all pollutants with toxic effects with reasonable consideration of the individual pollutant, endpoints, and adverse effects being considered" in their comment letter about the draft 303(d) list. It makes me angry that DNR chose to ignore those comments and did not list the 7 water quality limited segments on the 303(d) list submitted to DNR.
· I support the EPA looking into how the DNR is prioritizing those waters on the 303(d) list for development of TMDLs. I am concerned about how long waters are on the list without a TMDL.

I am concerned with the Outstanding Iowa Waters being given lower priority on TMDL development. On the current 303(d) list are numerous water segments that have been on the list since 2006 and 2008, with no TMDL having been prepared. Some of those waters on the list since 2006 and 2008 are designated as Outstanding Iowa Waters pursuant to Iowa's Antidegradation Policy. These waters are entitled to extra protection.

Just as troubling as the many years these Outstanding Iowa Waters have been on the list is the fact that DNR has designated them as low priority for preparing TMDLs. They have been designated as Tier III and Tier IV, putting them at the bottom of the priority list, essentially condemning them to perhaps never having a TMDL prepared. This is a clear violation of the intent, if not the specific language, of the Clean Water Act. Section 303(d) says the priority ranking must be made "taking into account the severity of the pollution and the uses to be made of such waters." 33 U.S.C. § 1313(d)(1)(A).
· I am concerned that the DNR is not fully implementing the plans to improve water quality that have been identified as part of the TMDL process. Given efforts by the state to reduce income taxes and the programs supported by those taxes, it appears that the TMDLs will not be implemented any time in the near future. The process of listing a water on the 303(d) list should result in water quality improvement in the near future. The 303(d) list and the TMDLs mean nothing if the TMDLs are not implemented.

The state of Iowa needs to come to grips with the excessive amounts of nitrate and nitrite that are entering the water bodies in the state. Along with that, efforts need to begin for setting water quality standards for nutrients. Plus, the state needs to undertake serious efforts to reduce the nutrients entering water bodies, through the TMDL process.

Iowa's voluntary Nutrient Reduction Strategy is not working in reducing nutrients in the state's waters.

Richard Dietz
[redacted]

From: Ned McPartland
To: R7-WaterDivision
Subject: Impaired Iowa Waters
Date: Monday, December 9, 2024 9:03:51 AM

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I support adding the Des Moines, Raccoon, Skunk and other Iowa rivers on this list to the impaired water's list. My drinking water depends on the Raccoon and Des Moines rivers whose nitrate levels are high. Also, I have paddled these two rivers which have other types of pollution as well. Thank you.

Edward McPartland

From:	Chris Lish
To:	R7-WaterDivision
Subject:	Iowans deserve transparent water quality information -- EPA"s Decision on Iowa's 2024 List of Water Quality-Limited Segments Requiring a Total Maximum Daily Load
Date:	Monday, December 9, 2024 12:01:24 PM

Monday, December 9, 2024

Subject: Iowans deserve transparent water quality information -- EPA's Decision on Iowa's 2024 List of Water Quality-Limited Segments Requiring a Total Maximum Daily Load

Dear Environmental Protection Agency,

EPA R7 Water Quality Section Supervisor David Pratt, EPA R7 TMDL and IR Coordinator Chelsea Paxson, and EPA R7 Standards and Water Quality Branch Supervisor Amy Shields,

Concerning the decision to add seven water quality-limited segments to Iowa's 2024 303(d) list.

My mother's family as deep roots in Iowa and I grew up playing in Iowa's water ways during summer vacations. I have many relatives who live in Iowa and who continue to enjoy Iowa's waterways this day. The Cedar, Des Moines, Iowa, Racoon, and South Skunk Rivers are places of importance to us.

Any water in Iowa that is impaired should be recognized as such, especially for nitrate pollution and contamination. Nitrates in our water pose a very serious problem in Iowa, with consequences to our health. We should have the right to clear and transparent water quality reporting data if there is any hope to improve. That means that the Iowa Department of Natural Resources (DNR) must hold themselves to the highest standard and adapt their methodology on ethics and worst-case impact to human health and drinking water supplies.

We want the water quality in Iowa to improve. It will not if we continue to allow for lax regulations and loopholes.

Please enforce the addition of these seven water quality-limited segments to Iowa's 2024 303(d) list so that it may reflect 712 impaired water segments for 581 water bodies listed.

Based on ethics and the security of our health and environment, I support the Environmental Protection Agency's request for the Iowa DNR to revise assessment of class "C" waters, remove the non-defensible use of the 10% rule in relation to nitrate and any other pollutants with toxic effects treated as conventional pollutants. To assess pollutants with toxic effects with reasonable consideration of the individual

pollutant and potential adverse effects.

Without strong enforcement, Iowa's waters and communities bear the burden of unacknowledged risk and a false sense of improvement.

I want the best for Iowa, our environment, water and people—and upholding the Iowa DNR to high standards is an important step to moving towards a healthier Iowa.

Thank you for your consideration of my comments and for standing up for our water. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA

From: Zita Cashin
To: R7-WaterDivision
Subject: Iowa water quality is NOT improving
Date: Tuesday, December 10, 2024 8:39:23 AM

The current administration leadership in Iowa is not being effective to establish real measures to improve our sources of clean water and waterways.
I appreciate the EPA's effort to evaluate our current water conditions and suggest more realistic ways to improve Iowa's water.
Agricultural manure spills into waterways occur too frequently in our state! Iowan is ranked 2nd in new cases of cancer being diagnosed! We need clean sources of water and the current administration is not serious to take the steps for meaningful water quality improvement.
Zita Cashin, resident in rural Iowa
Sent from my iPhone

From: Jaiden Shahan
To: R7-WaterDivision
Subject: Iowa Impaired Waters Public Comment
Date: Wednesday, December 11, 2024 6:56:54 AM

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I was told the public comment period for the issue of question classifications for segments of waters in Iowa ends December 13, so I am submitting a public comment on that.

Iowa, as part of the United States, has the EPA to secure environmental rights for its citizens, even if the state is against it. As a concerned Iowan, I hope the EPA considers stronger enforcement of the Clean Water Act in Iowa to protect Iowa citizens.

Thank you,
Jaiden Shahan
Hardin County, Iowa

From:	Patrick Bosold
To:	R7-WaterDivision
Cc:	"Patrick Bosold"
Subject:	Public comment on Iowa DNR"s list of impaired waterways
Date:	Friday, December 13, 2024 7:20:26 AM

Environmental Protection Agency, Region 7
Water Division
Via email to R7-WaterDivision@epa.gov
Re: Comment concerning Iowa's 2024 Section 303(d) list and EPA's request to add 7 water segments to the Iowa Dept. of Natural Resources 2024 draft list of Iowa's impaired waterways
Dear EPA Region 7 Water Division Staff,
Thank you for taking public comments on the Iowa Department of Natural Resources (DNR) list of impaired waterways in our state. I'm specifically referring to the DNR's 2024 draft list of Iowa's impaired waterways. Your agency directed the DNR to add seven segments of five Iowa rivers to the list because of high nitrate levels in those waters. The DNR has resisted adding those waters, and I appreciate that your agency is now seeking public comments on this matter.
Every two years the DNR is required to submit a draft 303d list of Iowa's impaired waterways to the EPA for its approval. Water segments that don't fully support all their designated uses (drinking water, recreation, protection of all aquatic life, etc.) require a plan to reduce and remove the pollutants called a total maximum daily load (TMDL).
This year's assessment found 577 water segments are polluted enough to require a TMDL. There are a total of 712 waterbodies categorized as impaired in Iowa, but not all of them have pollutant levels reaching the threshold requiring a TMDL.
The EPA is calling for the DNR to add segments of the Des Moines, Raccoon, Cedar, Iowa and South Skunk Rivers to their list and require a TMDL for each. These water segments were found to have nitrate levels exceeding the EPA's limits of 10 mg/L.
But the DNR has disputed the EPA's findings and says it won't change its methods to measure nitrates. Many water quality advocates and experts here in Iowa consider the DNR's methods faulty and inconsistent. I am one of those advocates.
High levels of nitrates are a danger to human health. Levels over 10 mg/L can cause fatal blue baby syndrome and have been linked to a variety of cancers

including colorectal, kidney, ovarian, stomach and thyroid cancers as well as birth defects.

The DNR should add these seven water body segments to their list, and then create and execute a plan to mitigate these high nitrate levels in order to protect public health.

It is evident that the Iowa DNR has failed to carry out its duties and responsibilities under its delegated authority under the Federal Clean Water Act. The DNR's failure to add these seven additional water segments to their 2024 draft list of Iowa's impaired waterways is further proof of this. If the DNR does not promptly comply with the EPA's request, I urge the EPA to withdraw the state's delegated authority under the Clean Water Act, and to require the state to comply with the requirements of the Clean Water Act.

Sincerely,

Patrick Bosold

From: [redacted]
To: R7-WaterDivision
Subject: DNR Must Be Accountable for Dirty Water
Date: Friday, December 13, 2024 7:25:12 AM

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

(1) The DNR is improperly applying the 10% rule to determine nitrate impairments. This rule uses a mathematical calculation developed by the EPA to designate a water as impaired if water samples reveal pollutants 10% of the time. While the EPA supports this rule for a variety of pollutants, it does not do so for nitrate due to its established toxicity. Consuming water laden with nitrate levels of 10 mg/L or more endangers public health. It can cause methemoglobinemia, blue baby syndrome, a fatal condition in infants. Studies link consuming high nitrate levels to colorectal, kidney, ovarian, stomach and thyroid cancers as well as birth defects.

Drinking water should never exceed nitrate levels of 10 mg/L ***one hundred percent of the time***. The DNR's methodology for measuring the nitrate levels using the 10% rule is faulty and irresponsible.

(2) The DNR bases the removal or inclusion of impaired waters on the 303(d) list on annual cycles of water data monitoring. But that doesn't take into account the inconsistencies of rainfall and drought over a period of several years. This is another flawed approach.

During drought years, rivers and streams flow less and conceal impairments. In wet years, as we saw this spring, rivers and streams that previously appeared unimpaired contain high levels of nitrate and phosphorus pollutants released by the heavy rainfall.

The DNR's approach to adding an impaired waterway identified during a wet year then removing it during a dry year if impairments don't appear present is inconsistent and problematic. It doesn't provide an accurate picture of Iowa's water quality nor does it enable watershed groups to accurately develop plans that can have a meaningful impact on mitigating polluted waterways.

The Iowa Environmental Council recommends the DNR use a 5-10 year window to evaluate impairments in waterways, a common-sense approach that would give a more accurate assessment of the presence of pollutants.

The DNR's refusal to add these seven segments to the 2024 303(d) list does a disservice to Iowans. Half of Iowa's waterways that undergo tests are impaired, and only half are tested every two years. This is an appalling state of affairs. At the very least, the Iowa DNR should add these waterbodies to the 2024 list and do a better job protecting public health.

Sincerely yours,

David & Jeannie Rose

Fairfield, Iowa

From:	Larry Mueller
To:	R7-WaterDivision
Subject:	clean water standards
Date:	Friday, December 13, 2024 8:32:45 AM

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219
Dear Mr. Robichaud,

I live in southwest Missouri and I am concerned about water quality in the midwest states...primarily due to poor regulation of waste from confined animal feeding operations.
I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.
Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:
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Sincerely yours,

Larry Mueller
Springfield, MO [redacted]

From:	Walker, Melissa
To:	R7-WaterDivision
Cc:	Corrigan, Ted
Subject:	Iowa Impaired Waters public comment
Date:	Friday, December 13, 2024 8:34:08 AM
Attachments:	image001.png Iowa Impaired Waters Public Comment_Des Moines Water Works.pdf

Good morning,

Please see the attached public comment regarding proposed action on Iowa's list of Section 303 (d) impaired waters. The letter is also provided below.

December 13, 2024

Jeffrey Robichaud
Water Division
U.S. EPA Region 7
11201 Renner Blvd.
Lenexa, KS 66219
Email: R7-WaterDivision@epa.gov

RE: 2024 List of Iowa Impaired Waters

Dear Mr. Robichaud,

On behalf of Des Moines Water Works (DMWW), I would like to thank the U.S. Environmental Protection Agency for your attention to Iowa's impaired water lists and for the proposed additions of two segments that are part of the drinking water source for central Iowa.

DMWW has served as a regional drinking water utility for more than 100 years. We provide clean, safe, reliable drinking water to 600,000 central Iowans – one-fifth of the state's population – but that mission is becoming increasingly difficult with the source water quality issues in the state of Iowa.

DMWW offers the following comments on the action proposed by the EPA on Iowa's 2024 list of Section 303 (d) impaired waters.

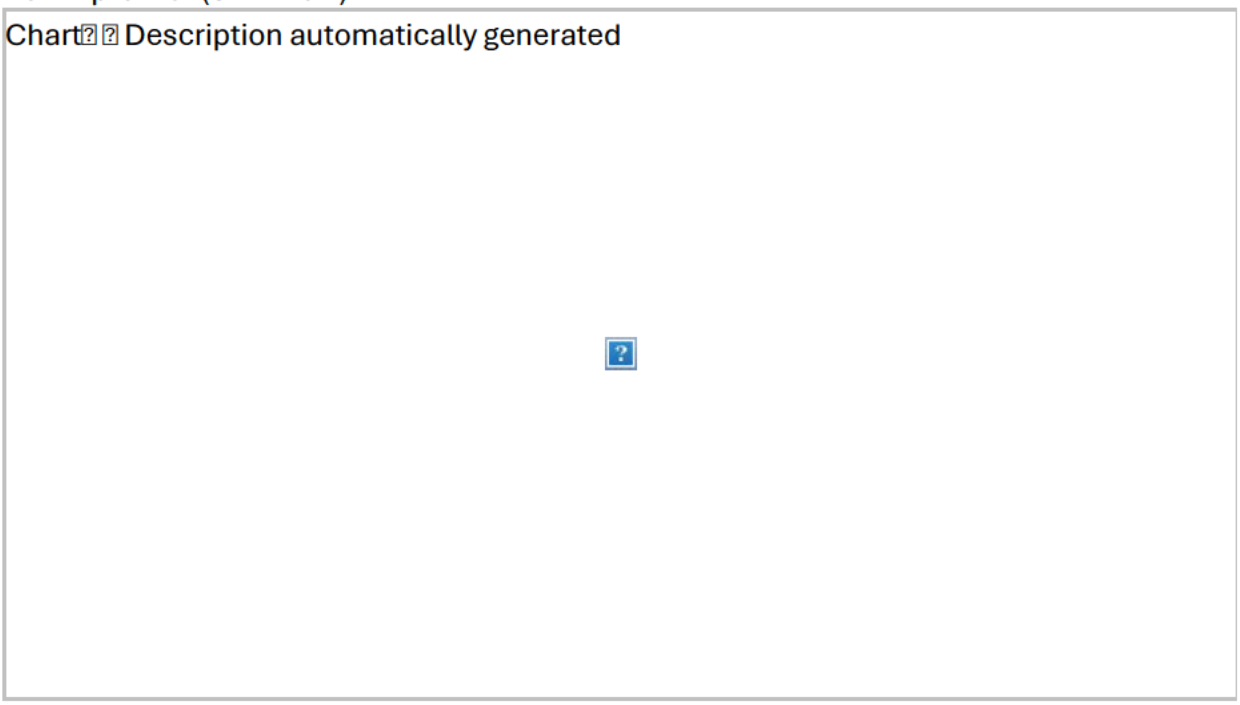
Two of the seven proposed additions to the impaired waters list directly affect central Iowa water users:

1. Des Moines River IA 04-UDM-1211 – a 6.53-mile segment of the river, which includes DMWW's intake at Prospect Park in Des Moines.
2. Raccoon River IA 04-RAC-1116 – a 15.59-mile segment of the river, including the entire section that runs through Des Moines Water Works Park and includes the intake at the Fleur Drive Treatment Plant in Des Moines.

DMWW has raised concerns about nitrate in raw source waters for years. We built our nitrate removal facility in 1992 to combat the issue, and since that time nitrate concentrations in the river flowing past the intake at our Fleur Drive Treatment Plant have

not improved. (See chart).

Chart Description automatically generated



Monthly average nitrate concentrations show significant volatility, but the trend line in both rivers continues to increase. This year, nitrate concentrations in the Raccoon River were among the highest we have seen, reaching a peak of 18.23 mg/L on June 24, nearly doubling the drinking water standard of 10 mg/L. In the Des Moines River, nitrate concentrations reached 15.56 mg/L on May 16, also higher than the drinking water standard.

Des Moines Water Works supports EPA's proposed additions to the 2024 impaired waters list, as it is our hope that the creation of Total Maximum Daily Loads (TMDLs) will allow for more sustainable drinking water sources well into the future. Thank you for the opportunity to comment.

Please feel free to contact me if you have any questions or need additional information.

Sincerely,

Ted Corrigan,
CEO and General Manager
Des Moines Water Works
Des Moines, Iowa
MELISSA WALKER | Office of the CEO | Communications and Outreach Manager
Des Moines Water Works | WATER YOU CAN TRUST FOR LIFE
2201 George Flagg Parkway | Des Moines, Iowa 50321
[redacted]
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December 13, 2024

Jeffrey Robichaud
Water Division
U.S. EPA Region 7
11201 Renner Blvd.
Lenexa, KS 66219
Email: R7-WaterDivision@epa.gov

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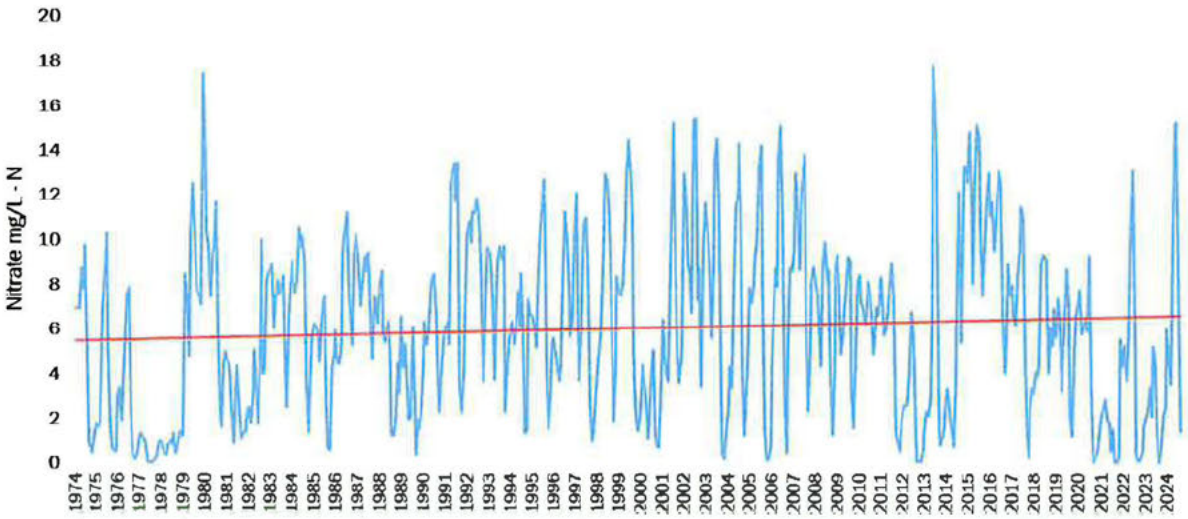
MONTHLY AVERAGE NITRATE CONCENTRATION – RACCOON RIVER
JANUARY 1974 - AUGUST 2024



Monthly average nitrate concentrations show significant volatility, but the trend line in both rivers continues to increase. This year, nitrate concentrations in the Raccoon River were among the highest we have seen, reaching a peak of 18.23 mg/L on June 24, nearly doubling the drinking water standard of 10 mg/L. In the Des Moines River, nitrate concentrations reached 15.56 mg/L on May 16, also higher than the drinking water standard.

Des Moines Water Works supports EPA's proposed additions to the 2024 impaired waters list, as it is our hope that the creation of Total Maximum Daily Loads (TMDLs) will allow for more sustainable drinking water sources well into the future. Thank you for the opportunity to comment.

Please feel free to contact me if you have any questions or need additional information.

Sincerely,

Ted Corrigan,
CEO and General Manager
Des Moines Water Works
Des Moines, Iowa

From:	Ed Brocksmith
To:	R7-WaterDivision
Cc:	Ed Brocksmith
Subject:	Iowa water polution
Date:	Friday, December 13, 2024 9:01:32 AM

Jeffrey Robichaud

Water Division

US EPA Region 7

11201 Renner Boulevard

Lenexa, KS 66219

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters. I remember when Arkansas refused the EPA's request to add impaired waters. EPA added them anyway.

Sincerely,
Ed Brocksmith
Tahlequah, Oklahoma

From: Robert Swanson
To: R7-WaterDivision
Subject: Iowa DNR and water
Date: Friday, December 13, 2024 9:07:32 AM

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

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(1) The DNR is improperly applying the 10% rule to determine nitrate impairments. This rule uses a mathematical calculation developed by the EPA to designate a water as impaired if water samples reveal pollutants 10% of the time. While the EPA supports this rule for a variety of pollutants, it does not do so for nitrate due to its established toxicity.

Consuming water laden with nitrate levels of 10 mg/L or more endangers public health. It can cause methemoglobinemia, blue baby syndrome, a fatal condition in infants. Studies link consuming high nitrate levels to colorectal, kidney, ovarian, stomach and thyroid cancers as well as birth defects.

Drinking water should never exceed nitrate levels of 10 mg/L *one hundred percent of the time*. The DNR's methodology for measuring the nitrate levels using the 10% rule is faulty and irresponsible.

(2) The DNR bases the removal or inclusion of impaired waters on the 303(d) list on annual cycles of water data monitoring. But that doesn't take into account the inconsistencies of rainfall and drought over a period of several years. This is another flawed approach.

During drought years, rivers and streams flow less and conceal impairments. In wet years, as we saw this spring, rivers and streams that previously appeared unimpaired contain high levels of nitrate and phosphorus pollutants released by the heavy rainfall. The DNR's approach to adding an impaired waterway identified during a wet year then removing it during a dry year if impairments don't appear present is inconsistent and problematic. It doesn't provide an accurate picture of Iowa's water quality nor does it enable watershed groups to accurately develop plans that can have a meaningful impact on mitigating polluted waterways.

The Iowa Environmental Council recommends the DNR use a 5-10 year window to evaluate impairments in waterways, a common-sense approach that would give a more accurate assessment of the presence of pollutants.

The DNR's refusal to add these seven segments to the 2024 303(d) list does a disservice to Iowans. Half of Iowa's waterways that undergo tests are impaired, and only half are

tested every two years. This is an appalling state of affairs. At the very least, the Iowa DNR should add these waterbodies to the 2024 list and do a better job protecting public health.
Sincerely yours,
Robert and Cynthia Swanson

From: JAN CORDERMAN
To: R7-WaterDivision
Subject: 2024 Iowa 303(d) list of impaired waters
Date: Friday, December 13, 2024 9:48:17 AM
Attachments: December 13, 2024, to EPA re IA DNR .docx

Please consider the attached letter in your deliberations regarding this matter.

Jan Corderman, Steering Committee
Iowa Alliance for Responsible Ag

December 13, 2024

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

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Sincerely yours,

Jan Corderman

[redacted]

From:	Paula A. Mohr
To:	R7-WaterDivision
Subject:	Iowa"s rivers
Date:	Friday, December 13, 2024 9:56:51 AM

Jeffrey Robichaud

Water Division

US EPA Region 7

11201 Renner Boulevard

Lenexa, KS 66219

Dear Mr. Robichaud,

I live near the Des Moines River and I am writing to urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

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Sincerely,

Paula Mohr

Keosauqua, Iowa

From: Lori Lohman
To: R7-WaterDivision
Subject: Iowa Water Quality
Date: Friday, December 13, 2024 10:07:58 AM

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

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Sincerely yours,

Lori Lohman
[redacted]

From:	Fonziba Koster
To:	R7-WaterDivision
Subject:	Please add these waters to the list of impaired waters in Iowa
Date:	Friday, December 13, 2024 11:02:04 AM

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

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Sincerely,

Fonziba Koster

--

Fonziba Koster

From:	Roger Leahy
To:	R7-WaterDivision
Cc:	Diane Rosenberg - JFAN
Subject:	Require the Iowa DNR to Add Waterways with Dangerous Nitrate Levels to the Impaired Water List
Date:	Friday, December 13, 2024 12:26:13 PM

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters. Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

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Sincerely,

Roger Leahy

From:	Patricia Timmens
To:	R7-WaterDivision
Subject:	Iowa nitrate levels
Date:	Friday, December 13, 2024 1:03:40 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear Mr. Robichaud,

I am hopeful you will require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. Iowa DNR is resisting their inclusion. To protect the public health of all of us in Iowa, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

(1) The DNR is improperly applying the 10% rule to determine nitrate impairments. This rule uses a mathematical calculation developed by the EPA to designate a water as impaired if water samples reveal pollutants 10% of the time. While the EPA supports this rule for a variety of pollutants, it does not do so for nitrate due to its established toxicity.

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The Iowa Environmental Council recommends the DNR use a 5-10 year window to evaluate impairments in waterways, a common-sense approach that would give a much more accurate assessment of the presence of pollutants.

The DNR's refusal to add these seven segments to the 2024 303(d) list does a disservice to all of us in Iowa. Half of Iowa's waterways that undergo tests are impaired, and only half are tested every two years. This is appalling. At the very least, the Iowa DNR should add these waterbodies to the 2024 list and do a better job protecting our public health.

Thank you for your time and attention.

Patricia Timmens in Cincinnati Iowa.
[redacted]

From: Michael Schmidt
To: R7-WaterDivision
Cc: Josh Mandelbaum
Subject: Comments on Iowa impaired waters list
Date: Friday, December 13, 2024 2:06:01 PM
Attachments: image001.png
IEC comments - 2024 EPA 303d additions.pdf

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Mr. Robichaud:

I have attached comments on behalf of the Iowa Environmental Council and Environmental Law & Policy Center regarding EPA's proposed disapproval of Iowa's 2024 impaired waters list. Please contact us if you have any questions regarding these comments.

Thank you for the opportunity to comment.

Sincerely,

Michael R. Schmidt (he/him) | General Counsel
[redacted]
Iowa Environmental Council
505 Fifth Avenue Suite 850
Des Moines IA 50309
iaenvironment.org

Iowa Environmental Council

505 Fifth Avenue, Suite 850
Des Moines, Iowa 50309-2317
515.244.1194 phone
iecmail@iaenvironment.org
www.iaenvironment.org

December 13, 2024

Jeffery Robichaud
Water Division
U.S. EPA Region 7
11201 Renner Blvd
Lenexa, KS 66219
Email: R7-WaterDivision@epa.gov

RE: 2024 List of Iowa Impaired Waters

Dear Mr. Robichaud:

The Iowa Environmental Council (IEC) and Environmental Law & Policy Center (ELPC) offer the following comments on the action proposed by the U.S. Environmental Protection Agency (EPA) on Iowa's 2024 list of Section 303(d) impaired waters. IEC is a nonprofit alliance of 100 organizations, at-large board members from business, farming, the sciences and education, and over 500 individual members. ELPC is a non-profit corporation with an office in Des Moines that works to promote clean energy, clean air, and clean water.

IEC and ELPC have raised concerns about nitrate in drinking water for years, including a petition for emergency action to address groundwater contamination in Northeast Iowa and a recently-updated report by IEC on health impacts of nitrate. We appreciate that EPA's action recognizes the persistent problem Iowa faces in addressing continued nitrate pollution.

I. GENERAL COMMENTS

EPA has requested comment on its proposed addition of seven impairments to Iowa's impaired waters list.

The additions by EPA reflect a numeric standard for nitrate applicable for drinking water uses. **Iowa's impaired waters list is incomplete for other uses because Iowa still lacks numeric nutrient criteria or a microcystin standard.** EPA issued recommendations for microcystin and numeric nutrient water quality standards that would protect recreational users from harmful algae blooms. In fact, the EPA's numeric nutrient criteria recommendations relied heavily on Iowa water quality data. When the Iowa Department of Natural Resources (DNR) released the 2020 and 2022 impaired waters lists, IEC called on the state to adopt microcystin and numeric nutrient criteria. DNR has not indicated that it will adopt those standards, and no timeline or formal

process has been set to begin the process of adopting criteria. DNR left those priorities out of the 2021-2023 Triennial Review.

DNR has an opportunity to include development of numeric nutrient criteria in the 2024-2026 Triennial Review, which the agency should conduct this year to satisfy the three-year requirement in federal regulations.[1] DNR has the information it needs to begin the work of adopting criteria, which are necessary to understand the condition of Iowa's waters and make progress on protecting Iowans from negative health impacts.

II. ADEQUACY OF MONITORING

The state's monitoring program is not sufficiently 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 from all available sources instead of being collected through a standardized, rigorous monitoring scheme that allows comparison over time.[2] EPA's action in this case reflects, in part, the different sources of water quality monitoring data in Iowa.

If the state provided greater funding to support 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 and ELPC urge the development of 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.

III. MONITORING METHODOLOGY

IEC and ELPC support EPA's proposed action for two reasons: the inapplicability of the "10% rule" to nitrate and the monitoring window considered by DNR.

a. Nitrate Methodology

Iowa DNR has relied on a "10% rule" to determine whether waters with limited data qualify as supporting their designated uses or impaired. The rule uses a mathematical evaluation developed by EPA to assess the likelihood of an exceedance based on small numbers of samples. DNR has used the method in past years to assess water quality for nitrate that applies to drinking water

[1] 33 U.S.C. § 1313(c)(1); 40 C.F.R. § 131.20(a). Iowa DNR's last review of water quality standards was conducted in 2021. *See* Iowa DNR, "Triennial Review Work Plan and Responsiveness Summary 2021-2023" (Sept. 2021), available at https://www.iowadnr.gov/Portals/idnr/uploads/watermonitoring/standards/Iowas%20Triennial%20Review%20Work%20Plan%202021-2023.pdf.

[2] Iowa DNR. "Methodology for Iowa's 2024 Water Quality Assessment, Listing, and Reporting Pursuant to Sections 305(b), 303(d), and 314 of the Federal Clean Water Act" ("Methodology"). 29 Sept. 2023. Pg. 13-16.

sources.[3] In its 2024 assessment methodology, DNR expanded its use of the 10% rule to use a modified approach for waters with seven to nine samples.[4]

EPA supported the use of this rule for conventional pollutants such as biochemical oxygen demand. However, in its review of DNR's 2024 methods, EPA called for DNR not to apply the approach to nitrate in its public comments to the state.[5] EPA reasoned that nitrate is not a conventional pollutant and has known toxicity; allowing exceedances does not align with the designated use.[6]

IEC and ELPC agree with EPA that allowing nitrate to exceed the drinking water standard as proposed by DNR is inconsistent with the water body fully supporting the designated use. Water treatment providers need to ensure that nitrate is below the standard at all times, not just 90 percent of the time. As EPA noted in its proposed decision document, the drinking water standard was calculated "to protect infants, and all other groups, against the nononcogenic effects presented by nitrate and nitrite in drinking water."[7]

IEC summarized the risks of high nitrate concentrations for human health in *Nitrate in Drinking Water: A Public Health Concern for All Iowans*, updated in 2024.[8] The report notes that the drinking water standard protects against acute health risks – those that occur with short-term exposure. Allowing any fraction of exceedance above the standard would increase the risk of methemoglobinemia.

b. Monitoring Window

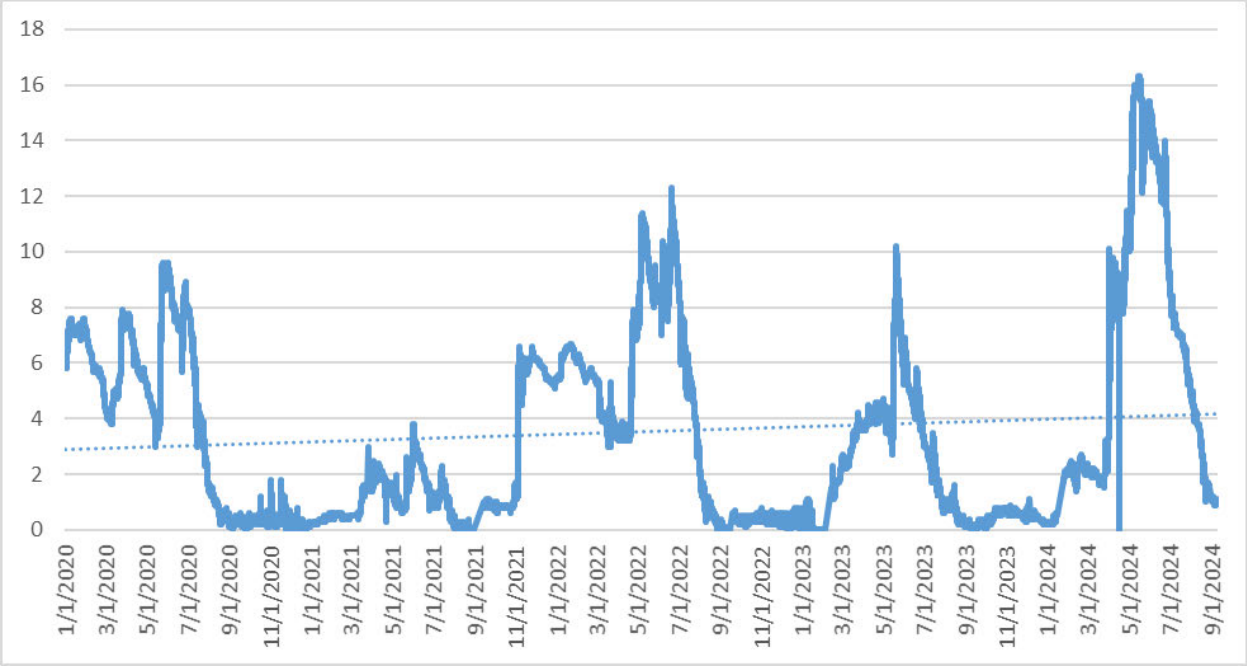
DNR's approach to use one cycle to impair and a three-year window of monitoring data to delist for all impairments is not rational or practical. DNR's reliance on a three-year period to list and delist waters for impairment is not reasonable or practical for the purposes of addressing impairments.[9] When a waterway does not show signs of an impairment during one cycle, it does not mean that the waterway has actually improved or the impairment has been addressed. As we have seen in recent years, drought has seriously impacted the flows of Iowa's streams and rivers. Reduced flows can mask an impairment due to temporary reductions of pollutants entering waterways. However, the impairment may quickly reappear when flows return to normal. Using one cycle to remove waters from the list could create a situation where a waterway is removed and added to the list, back and forth, in subsequent cycles, leaving it in limbo for development of

[3] *See* Iowa DNR, "Methodology for Iowa's 2022 Water Quality Assessment, Listing, and Reporting Pursuant to Sections 305(b) and 303(d) of the Federal Clean Water Act," Feb. 9, 2022, at 49.
[4] Iowa DNR, "Methodology for Iowa's 2024 Water Quality Assessment, Listing, and Reporting Pursuant to Sections 305(b), 303(d), and 314 of the Federal Clean Water Act," Sept. 29, 2023, at 11.
[5] U.S. EPA Region 7, "Partial Approval/Partial Disapproval of Iowa's 2024 Section 303(d) List," Nov. 12, 2024, at 9.
[6] *Id.* at 13.
[7] *Id.* (citing National Primary Drinking Water Regulations Final Rule, 1991).
[8] IEC (May 2024), available at https://www.iaenvironment.org/webres/File/IEC_Nitrate_in_Drinking_Water_2024FINAL.pdf.
[9] *Id* at 14 (describing use of three year periods for binomial parameters).

a TMDL and causing confusion for watershed groups that are trying to make improvements and install pollution reduction practices.

Analysis of longer-term nitrate data show that there has not been a significant improvement in nitrate loading in the Cedar River.[10] Estimated annual concentrations of nitrate-N increased from 5.1 mg/L in 1990 to 6.6 mg/L in 2020.[11] DNR cannot reasonably conclude that the Cedar River no longer has a nitrate problem. As shown in Figure 1, the Des Moines River has similarly had temporary declines during the 2020-2022 period that DNR considered, despite significantly exceeding the standard in 2024 and showing a small upward trend during this period.

Figure 1. Nitrate Concentrations in the Des Moines River at 2nd Ave, 2020-2024 (with linear trendline).[12]



DNR should consider moving to a 5- or 10-year window for assessing waters for impairments. The longer window would conform to the window used to assess progress on the Nutrient Reduction Strategy.

IV. CONCLUSION

IEC and ELPC support EPA's proposed additions to the 2024 impaired waters list. While Iowa's drinking water utilities have a strong track record of meeting drinking water standards, the state faces serious problems with nitrate contamination in drinking water sources and needs stronger action to ensure that all Iowans will have safe drinking water in the future.

[10] "Water Quality Gauge, Cedar River, Palo, IA," Iowa Water Quality Information System, IIHR, University of Iowa (last accessed Nov. 7, 2022), available at: https://iwqis.iowawis.org/app/.
[11] Stephen J. Kalkhoff, "Hydrologic and Water-Quality Conditions in the Cedar River Alluvial Aquifer, Linn County, Iowa, 1990-2019," U.S. Geological Survey (2021) at 48.
[12] U.S. Geological Survey, available at https://waterdata.usgs.gov/monitoring-location/05482000/.

Thank you for the opportunity to comment on the draft 2024 impaired waters list. Please let us know if you have questions about these comments.

Sincerely,

/s/ Michael R. Schmidt
Michael R. Schmidt
General Counsel
Iowa Environmental Council
505 5th Ave. Suite 850
Des Moines, IA 50309
[redacted]

/s/ Joshua T. Mandelbaum
Joshua T. Mandelbaum
Senior Attorney
Environmental Law & Policy Center
505 5th Ave. Suite 333
Des Moines, IA 50309
[redacted]

From: mary Johannsen
To: R7-WaterDivision
Subject: Iowa DNR Water Regulations
Date: Friday, December 13, 2024 10:52:02 AM

I am urging the EPA to require the Iowa DNR to do it's job to protect Iowans from polluted waterways. Iowa is now #2 in the Nation for rising cancer levels. The Confined Animal Feeding Operations (CAFO) industry in Iowa is in all reality unregulated. Until Iowa citizens are protected by our own State Legislators, we need the federal government office like the EPA to atleast inform us of the continued high levels of contaminated waterways.

Mary Johannsen
Concerned Iowa Citizen

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

(1) The DNR is improperly applying the 10% rule to determine nitrate impairments. This rule uses a mathematical calculation developed by the EPA to designate a water as impaired if water samples reveal pollutants 10% of the time. While the EPA supports this rule for a variety of pollutants, it does not do so for nitrate due to its established toxicity.

Consuming water laden with nitrate levels of 10 mg/L or more endangers public health. It can cause methemoglobinemia, blue baby syndrome, a fatal condition in infants. Studies link consuming high nitrate levels to colorectal, kidney, ovarian, stomach and thyroid cancers as well as birth defects.

Drinking water should never exceed nitrate levels of 10 mg/L ***one hundred percent of the time***. The DNR's methodology for measuring the nitrate levels using the 10% rule is faulty and irresponsible.

(2) The DNR bases the removal or inclusion of impaired waters on the 303(d) list on annual cycles of water data monitoring. But that doesn't take into account the inconsistencies of rainfall and drought over a period of several years. This is another flawed approach.

During drought years, rivers and streams flow less and conceal impairments. In wet years, as we saw this spring, rivers and streams that previously appeared unimpaired contain high levels of nitrate and phosphorus pollutants released by the heavy rainfall. The DNR's approach to adding an impaired waterway identified during a wet year then removing it during a dry year if impairments don't appear present is inconsistent and problematic. It doesn't provide an accurate picture of Iowa's water quality nor does it enable watershed groups to accurately develop plans that can have a meaningful impact on mitigating polluted waterways.

The Iowa Environmental Council recommends the DNR use a 5-10 year window to evaluate impairments in waterways, a common-sense approach that would give a more accurate assessment of the presence of pollutants.

The DNR's refusal to add these seven segments to the 2024 303(d) list does a disservice to Iowans. Half of Iowa's waterways that undergo tests are impaired, and only half are tested every two years. This is an appalling state of affairs. At the very least, the Iowa DNR should add these waterbodies to the 2024 list and do a better job protecting public.

Sincerely,

Pamela Karll Slowick
Fairfield, IA.

From:	Dan Haug
To:	R7-WaterDivision
Subject:	Public comment on Iowa's 2024 Section 303(d) list and 7 water segments being added
Date:	Friday, December 13, 2024 5:17:04 PM

Dear Water Division Staff,

I agree with the EPA's decision to add seven river segments to Iowa's impaired waters list. I hope that this change will lead to greater transparency about how nitrate pollution of surface waters affects the cost and safety of drinking water, but am concerned there will be unintended consequences.

Iowa's Credible Data Law has sometimes been a convenient excuse to assess fewer waters, and thereby discover fewer problems. However, that doesn't seem to be the issue here. Each of the water bodies on this list had at least one "credible" nitrate sample violating the 10 mg/L drinking water standard during the three year assessment period.

- Raccoon River: 38/755
- Cedar River: 1/36 or 7/151
- Lower Des Moines River: 2/33
- Upper Des Moines River: 11/758
- Iowa River: 5/146 or 18/2698
- South Skunk River: 2/36

As I understand it, the issue is the threshold for impairment. Since fewer than 10% of the samples (accounting for some statistical correction factor) exceeded 10 mg/L, IDNR says these sites meet the standard. EPA says they do not.

The Iowa DNR's position is not defensible. In the draft 2024 assessment, Raccoon River near Des Moines was shown as fully supporting its designated use for drinking water because

A) Nitrate in the Raccoon River exceeded 10 mg/L nitrate less than 10% of the time during the 2020-2022 assessment period

B) Nitrate in finished drinking water at the Des Moines Waterworks never exceeded 10 mg/L.

This makes no sense. Even one sample exceeding the Maximum Contaminant Level for nitrate would constitute a violation of the Safe Drinking Water Act, requiring public notice. To avoid this, the Des Moines Waterworks had to run its nitrate removal facility for weeks in 2022 at a cost of $10,000 a day, as well as blending water from other sources and asking residents to reduce water use. Clearly, poor water quality is limiting that beneficial use of the river water!

However, the South Skunk River no longer supplies drinking water to the City of Oskaloosa. The City now gets its water from an alluvial aquifer, and is able to achieve low levels of nitrate in finished water (1.17 mg/L, in the latest Consumer Confidence report) without expensive treatment. I understand that the Clean Water Act does not allow designated uses to be removed if restoring them is still achievable. However, I hope that in prioritizing and writing TMDLs we can be cognizant of facts on the ground. In the unlikely event that a TMDL for the Skunk Skunk River is written and it leads to stricter effluent limits for upstream point sources, we might be imposing real costs on Ames, Story City, and Nevada without achieving real benefits for Oskaloosa.

I am also concerned that disallowing the 10% binomial rule might lead to further politicization of funding for water monitoring. Water quality in rivers is highly variable, and daily or weekly monitoring might pick up on a short-term spike in nitrate that is missed by monthly monitoring. If a single sample can trigger impairment but there are no rules on how often a site has to be monitored, cutting budgets for monitoring programs becomes a tempting way to evade regulation and

controversy.

--

Dan Haug ♦ Water Quality Specialist

Prairie Rivers of Iowa ♦ 501(c)(3) Non-Profit
3116 S. Duff Avenue, Suite 201 ♦ Ames, IA 50010
tel 515.232.0048 ♦ fax 515.233.1131
dhaug@prrcd.org ♦ www.prrcd.org

From: Steven Paulsrud
To: R7-WaterDivision
Subject: Water
Date: Friday, December 13, 2024 6:37:10 PM

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

(1) The DNR is improperly applying the 10% rule to determine nitrate impairments. This rule uses a mathematical calculation developed by the EPA to designate a water as impaired if water samples reveal pollutants 10% of the time. While the EPA supports this rule for a variety of pollutants, it does not do so for nitrate due to its established toxicity.

Consuming water laden with nitrate levels of 10 mg/L or more endangers public health. It can cause methemoglobinemia, blue baby syndrome, a fatal condition in infants. Studies link consuming high nitrate levels to colorectal, kidney, ovarian, stomach and thyroid cancers as well as birth defects.

Drinking water should never exceed nitrate levels of 10 mg/L ***one hundred percent of the time***. The DNR's methodology for measuring the nitrate levels using the 10% rule is faulty and irresponsible.

(2) The DNR bases the removal or inclusion of impaired waters on the 303(d) list on annual cycles of water data monitoring. But that doesn't take into account the inconsistencies of rainfall and drought over a period of several years. This is another flawed approach.

During drought years, rivers and streams flow less and conceal impairments. In wet years, as we saw this spring, rivers and streams that previously appeared unimpaired contain high levels of nitrate and phosphorus pollutants released by the heavy rainfall. The DNR's approach to adding an impaired waterway identified during a wet year then removing it during a dry year if impairments don't appear present is inconsistent and problematic. It doesn't provide an accurate picture of Iowa's water quality nor does it

enable watershed groups to accurately develop plans that can have a meaningful impact on mitigating polluted waterways.
The Iowa Environmental Council recommends the DNR use a 5-10 year window to evaluate impairments in waterways, a common-sense approach that would give a more accurate assessment of the presence of pollutants.
The DNR's refusal to add these seven segments to the 2024 303(d) list does a disservice to Iowans. Half of Iowa's waterways that undergo tests are impaired, and only half are tested every two years. This is an appalling state of affairs. At the very least, the Iowa DNR should add these waterbodies to the 2024 list and do a better job protecting public health.
Sincerely yours,
Your Signature

Steven Paulsrud, D.O.

From:	Murray Foster
To:	R7-WaterDivision
Subject:	Require the Iowa DNR to Add Waterways with Dangerous Nitrate Levels to the Impaired Water List
Date:	Friday, December 13, 2024 10:57:00 PM

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

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The Iowa Environmental Council recommends the DNR use a 5-10 year window to evaluate impairments in waterways, a common-sense approach that would give a more accurate assessment of the presence of pollutants.

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From:	Diane James
To:	R7-WaterDivision
Subject:	Iowa Water
Date:	Saturday, December 14, 2024 5:11:31 AM

Dear Mr. Robichaud,

Please require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

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The Iowa Environmental Council recommends the DNR use a 5-10 year window to evaluate impairments in waterways, a common-sense approach that would give a more accurate assessment of the presence of pollutants.

The DNR's refusal to add these seven segments to the 2024 303(d) list does a disservice to Iowans. Half of Iowa's waterways that undergo tests are impaired, and only half are tested every two years. This is an appalling state of affairs. At the very least, the Iowa DNR should add these waterbodies to the 2024 list and do a better job protecting public health.

Sincerely yours,

Diane James

From:	Nancy Leahy
To:	R7-WaterDivision
Subject:	Please uphold our water safety!
Date:	Saturday, December 14, 2024 11:18:10 AM

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

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Sincerely yours,

Nancy Leahy

[redacted]

From: Susan Johnson
To: R7-WaterDivision
Subject: Clean water for all Iowans
Date: Saturday, December 14, 2024 6:18:35 PM

Mr. Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

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The Iowa Environmental Council recommends the DNR use a 5-10 year window to evaluate impairments in waterways, a common-sense approach that would give a more accurate assessment of the presence of pollutants.

The DNR's refusal to add these seven segments to the 2024 303(d) list does a disservice to Iowans. Half of Iowa's waterways that undergo tests are impaired, and only half are tested every two years. This is an appalling state of affairs. At the very least, the Iowa DNR should add these waterbodies to the 2024 list and do a better job protecting public health.

Sincerely yours,

Frances Burmeister
[redacted]

From: jennifer fishback
To: R7-WaterDivision
Subject: Iowa Dept. of Natural Resources
Date: Saturday, December 14, 2024 9:47:59 PM

Jeffrey Robichaud
Water Division
USEPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,
Please convince the Iowa DNR to add the seven impairments that have unhealthy nitrate levels to the 2024 Iowa list of impaired waters. The Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10mg or higher. They need a category 5 impairment.

The Iowa DNR is using the 10% rule to measure these waterways but you're not supposed to use that for nitrates. Those waters should never be at 10%. High nitrates are linked to colorectal, kidney, ovarian, stomach, and thyroid cancer, plus birth defects. Drinking water should never exceed 10%. Cancer rates in Iowa are very high and growing higher.

The Iowa DNR measurements don't take drought into consideration. Wet years show more accurately how much impairment there really is. During drought, levels don't measure as high so these rivers are taken off the lists not because they are not impaired but because it is too dry to tell. That inconsistency makes it difficult to make a clear correction plan. Iowa Environmental Council suggests the Iowa DNR use a 5-10 year window to evaluate. which would be more accurate, but the DNR refuses.

We hope you can help all of us in Iowa with our continuing water problems.

Sincerely,
Jennifer Fishback

From: Jim Karpen
To: R7-WaterDivision
Subject: Please crack down on Iowa"s DNR
Date: Sunday, December 15, 2024 10:59:04 AM

Thank you for your efforts to protect Iowans. We have the second highest cancer rate in the country, and I hope that your vigilance will improve that.

Please ensure that segments of the Des Moines, Raccoon, Cedar, Iowa and South Skunk Rivers are added to the list of segments requiring a TDML. These segments have high levels of nitrates. Iowa's DNR is using a faulty and inconsistent method to measure nitrates.

The DNR should also create a plan to mitigate high nitrate levels.

We appreciate your efforts.

Jim

From:	Bob Koczela
To:	R7-WaterDivision
Subject:	Please protect Iowans from toxic water
Date:	Sunday, December 15, 2024 6:49:28 PM
Attachments:	Letter to EPA,12-15-24.pdf

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear Mr. Robichaud,
Please find my signed letter below.
Thank you.
Sincerely,
Bob Koczela

Bob Koczela
Expert Tree Consulting, Inc.
A.S., Arboriculture
Certified Arborist, ISA #MW-5052A
Member, Past Board Member, Iowa Arborist Association
[redacted]

December 14, 2024

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:
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The Iowa Environmental Council recommends the DNR use a 5-10 year window to evaluate impairments in waterways, a common-sense approach that would give a more accurate assessment of the presence of pollutants.

over →

The DNR's refusal to add these seven segments to the 2024 303(d) list does a disservice to Iowans. Half of Iowa's waterways that undergo tests are impaired, and only half are tested every two years. This is an appalling state of affairs. At the very least, the Iowa DNR should add these waterbodies to the 2024 list and do a better job protecting public health.

Sincerely yours,

Bob Koczela
Expert Tree Consulting, Inc.
A.S., Arboriculture
Certified Arborist, ISA #MW-5052A
Member, Past Board Member, Iowa Arborist Association
[redacted]

From: Sheila Gregan
To: R7-WaterDivision
Subject: Iowas'water quality
Date: Monday, December 16, 2024 10:41:49 AM

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,

I am a native Iowan and am outraged at how Big Ag has been allowed to destroy our water!! I live in Des Moines where we pay more for nitrate removal systems, and I do not drink the water when I travel through rural Iowa. It is shameful!

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.
Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

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Sincerely yours,
Sheila Gregan
Des Moines, IA

"The only thing necessary for the triumph of evil is for good people to do nothing"

From: Linda Egenes
To: R7-WaterDivision
Subject: The DNA in Iowa must be accountable for dirty water--a letter from an Iowan
Date: Monday, December 16, 2024 10:48:52 AM

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Jeffrey Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

(1) The DNR is improperly applying the 10% rule to determine nitrate impairments. This rule uses a mathematical calculation developed by the EPA to designate a water as impaired if water samples reveal pollutants 10% of the time. While the EPA supports this rule for a variety of pollutants, it does not do so for nitrate due to its established toxicity.

Consuming water laden with nitrate levels of 10 mg/L or more endangers public health. It can cause methemoglobinemia, blue baby syndrome, a fatal condition in infants. Studies link consuming high nitrate levels to colorectal, kidney, ovarian, stomach and thyroid cancers as well as birth defects.

Drinking water should never exceed nitrate levels of 10 mg/L ***one hundred percent of the time***. The DNR's methodology for measuring the nitrate levels using the 10% rule is faulty and irresponsible.

(2) The DNR bases the removal or inclusion of impaired waters on the 303(d) list on annual cycles of water data monitoring. But that doesn't take into account the inconsistencies of rainfall and drought over a period of several years. This is another flawed approach.

During drought years, rivers and streams flow less and conceal impairments. In wet years, as we saw this spring, rivers and streams that previously appeared unimpaired contain high levels of nitrate and phosphorus pollutants released by the heavy rainfall.

The DNR's approach to adding an impaired waterway identified during a wet year then removing it during a dry year if impairments don't appear present is inconsistent and problematic. It doesn't provide an accurate picture of Iowa's water quality nor does it enable watershed groups to accurately develop plans that can have a meaningful impact on mitigating polluted waterways.

The Iowa Environmental Council recommends the DNR use a 5-10 year window to evaluate impairments in waterways, a common-sense approach that would give a more accurate assessment of the presence of pollutants.

The DNR's refusal to add these seven segments to the 2024 303(d) list does a disservice to Iowans. Half of Iowa's waterways that undergo tests are impaired, and only half are tested every two years. This is an appalling state of affairs. At the very least, the Iowa DNR should add these waterbodies to the 2024 list and do a better job protecting public health.

Sincerely yours,
Linda Egenes

From:	Diane Rosenberg
To:	R7-WaterDivision
Subject:	Public Comments Regarding Iowa 303(d) List
Date:	Monday, December 16, 2024 2:26:06 PM
Attachments:	image001.jpg JFAN Public Comments on 2024 Iowa 303(d) List.docx

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,

Jefferson County Farmers & Neighbors, Inc. is a 501c3 community organization that educates the public about the environmental, public health, and quality of life impacts of concentrated animal feeding operations. In this, we advocate for clean water.

These public comments are regarding the seven impairments of the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers that the EPA is directing the Iowa Department of Natural Resources to add to the 2024 Iowa 303(d) list. Given that the nitrate levels of those segments were above the 10 mg/L EPA limit, it is unconscionable that the DNR is resisting their inclusion.

We urge you to require the DNR to include those impairments for the following reasons:

1.) Nitrate is a toxic pollutant, dangerous to health at levels higher than 10 mg/L and fatal to infants. Numerous studies link consuming water containing high nitrate levels to a variety of cancers including colorectal, kidney, ovarian, stomach and thyroid cancers as well as birth defects. Studies also link nitrate consumption to these cancers at levels between 5-10 mg/L.

The DNR is using the 10% rule to determine nitrate impairments. The EPA supports this rule for a variety of pollutants, but not for nitrate due to its known toxicity. Drinking water should be free of nitrates over 10mg/L 100% of the time otherwise it's a public health threat. Iowa's cancer rates are the second highest in the nation and continuing to grow. The state should be safeguarding its citizens by creating a TMDL for each of these impairments.

2.) The DNR is using an annual cycle to determine whether water quality is impaired or not, but that doesn't account for inconsistent levels of rainfall and drought. As we continue to experience the effects of climate change and irregular weather patterns, an annual cycle is not an effective nor accurate way to determine water impairments. The DNR's approach of adding an impaired waterway identified during a wet year then removing it during a dry year if impairments aren't present is inconsistent and problematic. It doesn't provide an accurate picture of Iowa's water quality nor does it enable watershed groups to accurately develop plans that can have a meaningful impact on mitigating polluted waterways.

JFAN supports the Iowa Environmental Council's recommendation that the DNR use a 5-10 year window to evaluate water impairments to provide a more realistic

assessment of nitrates in waterways.
3.) Not only should the seven impairments be added to the 303(d) list, there should be a more robust effort to actually create TMDLs to improve water quality. But the DNR's efforts are woefully inadequate and barely existent.
There are 577 Category 5 segments in the current 303(d) list that each need a TMDL. As of today, there have been no approved TMDL's in 2024, only two in 2023, one in 2022, and three in 2021 and seven in 2020. That's a 0.02% completion rate over the last five years. This is simply unacceptable. Iowa's dirty water will never get clean with this paltry level of action. I urge you to require the DNR to not only add these seven impairments, but to take serious steps to rectify all the Category 5 impairments in an expedient manner.
Iowans deserve clean water and they deserve to have an agency that cares enough about the public health of its citizenry. Half of our tested waterways wind up as either Category 4 or 5 and only half are tested every two years. Why does the EPA allow this state of affairs in Iowa?
At the very least, the EPA should require the DNR to add these seven impairments to its 2024 Iowa 303(d) list.
We additionally support the public comments of the Iowa Environmental Council.
Sincerely yours,
Diane Rosenberg

--

Diane Rosenberg
President and Executive Director

Jefferson County Farmers & Neighbors, Inc.
P.O. Box 811
Fairfield, IA 52556
[redacted]
641-209-6600 – Voice Mail
www.jfaniowa.org
jfan@lisco.com
www.Facebook.com/JFANIowa
https://Twitter.com/JFANIowa
Iowa Alliance for Responsible Agriculture (IARA)
www.iowaresponsibleagriculture.org
"It always seems impossible until it's done." - Nelson Mandela

December 16, 2024

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,

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These public comments are regarding the seven impairments of the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers that the EPA is directing the Iowa Department of Natural Resources to add to the 2024 Iowa 303(d) list. Given that the nitrate levels of those segments were above the 10 mg/L EPA limit, it is unconscionable that the DNR is resisting their inclusion.

We urge you to require the DNR to include those impairments for the following reasons:

1.) Nitrate is a toxic pollutant, dangerous to health at levels higher than 10 mg/L and fatal to infants. Numerous studies link consuming water containing high nitrate levels to a variety of cancers including colorectal, kidney, ovarian, stomach and thyroid cancers as well as birth defects. Studies also link nitrate consumption to these cancers at levels between 5-10 mg/L.

The DNR is using the 10% rule to determine nitrate impairments. The EPA supports this rule for a variety of pollutants, but not for nitrate due to its known toxicity.

Drinking water should be free of nitrates over 10mg/L 100% of the time otherwise it's a public health threat. Iowa's cancer rates are the second highest in the nation and continuing to grow. The state should be safeguarding its citizens by creating a TMDL for each of these impairments.

2.) The DNR is using an annual cycle to determine whether water quality is impaired or not, but that doesn't account for inconsistent levels of rainfall and drought. As we continue to experience the effects of climate change and irregular weather patterns, an annual cycle is not an effective nor accurate way to determine water impairments.

The DNR's approach of adding an impaired waterway identified during a wet year then removing it during a dry year if impairments aren't present is inconsistent and problematic. It doesn't provide

an accurate picture of Iowa's water quality nor does it enable watershed groups to accurately develop plans that can have a meaningful impact on mitigating polluted waterways.

JFAN supports the Iowa Environmental Council's recommendation that the DNR use a 5-10 year window to evaluate water impairments to provide a more realistic assessment of nitrates in waterways.

3.) Not only should the seven impairments be added to the 303(d) list, there should be a more robust effort to actually create TMDLs to improve water quality. But the DNR's efforts are woefully inadequate and barely existent.

There are 577 Category 5 segments in the current 303(d) list that each need a TMDL. As of today, there have been no approved TMDL's in 2024, only two in 2023, one in 2022, and three in 2021 and seven in 2020. That's a 0.02% completion rate over the last five years. This is simply unacceptable. Iowa's dirty water will never get clean with this paltry level of action. I urge you to require the DNR to not only add these seven impairments, but to take serious steps to rectify all the Category 5 impairments in an expedient manner.

Iowans deserve clean water and they deserve to have an agency that cares enough about the public health of its citizenry. Half of our tested waterways wind up as either Category 4 or 5 and only half are tested every two years. Why does the EPA allow this state of affairs in Iowa?

At the very least, the EPA should require the DNR to add these seven impairments to its 2024 Iowa 303(d) list.

We additionally support the public comments of the Iowa Environmental Council.

Sincerely yours,

Diane Rosenberg
Executive Director

From:	Richard Sims
To:	R7-WaterDivision
Subject:	Require the DNR to Add Waterways with Dangerous Nitrate Levels to the Impaired Water List
Date:	Monday, December 16, 2024 7:53:08 PM

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

(1) The DNR is improperly applying the 10% rule to determine nitrate impairments. This rule uses a mathematical calculation developed by the EPA to designate a water as impaired if water samples reveal pollutants 10% of the time. While the EPA supports this rule for a variety of pollutants, it does not do so for nitrate due to its established toxicity. Consuming water laden with nitrate levels of 10 mg/L or more endangers public health. It can cause methemoglobinemia, blue baby syndrome, a fatal condition in infants. Studies link consuming high nitrate levels to colorectal, kidney, ovarian, stomach and thyroid cancers as well as birth defects.

Drinking water should never exceed nitrate levels of 10 mg/L ***one hundred percent of the time***. The DNR's methodology for measuring the nitrate levels using the 10% rule is faulty and irresponsible.

(2) The DNR bases the removal or inclusion of impaired waters on the 303(d) list on annual cycles of water data monitoring. But that doesn't take

into account the inconsistencies of rainfall and drought over a period of several years. This is another flawed approach.
During drought years, rivers and streams flow less and conceal impairments. In wet years, as we saw this spring, rivers and streams that previously appeared unimpaired contain high levels of nitrate and phosphorus pollutants released by the heavy rainfall.
The DNR's approach to adding an impaired waterway identified during a wet year then removing it during a dry year if impairments don't appear present is inconsistent and problematic. It doesn't provide an accurate picture of Iowa's water quality nor does it enable watershed groups to accurately develop plans that can have a meaningful impact on mitigating polluted waterways.
The Iowa Environmental Council recommends the DNR use a 5-10 year window to evaluate impairments in waterways, a common-sense approach that would give a more accurate assessment of the presence of pollutants.
The DNR's refusal to add these seven segments to the 2024 303(d) list does a disservice to Iowans. Half of Iowa's waterways that undergo tests are impaired, and only half are tested every two years. This is an appalling state of affairs. At the very least, the Iowa DNR should add these waterbodies to the 2024 list and do a better job protecting public health.
Please take this action NOW,

Rich Sims
Fairfield, Iowa

DEC 17 2024

December 10, 2024

Environmental Protection Agency, Region 7
Water Division
Via email to ~~R7-WaterDivision@epa.gov~~ US Mail

Re: Iowa's 2024 Section 303(d) list and 7 water segments being added

Dear Water Division Staff,

Thanks you for your attention to this matter. I appreciate the opportunity to comment on the proposed revisions to the 2024 Section 303(d) list. I support adding the 7 water quality limited segments to the 303(d) list identified in your November 12, 2024, letter to Ed Tormey at the Iowa Department of Natural Resources (DNR). The 7 segments include portions of the following rivers and involve nitrate and nitrite pollution: • Cedar River • Des Moines River • Iowa River • Raccoon River • South Skunk River.

I support the EPA's analysis of the Iowa Department of Natural Resources processes and methods of determining whether a water should be listed on the Section 303(d) list, including:
• The DNR did not use the Iowa Water Quality Information System data, including information from the U.S. Geological Survey and the University of Iowa's Iowa Institute for Hydrologic Research monitors. This data is credible and collected by professionals dealing with water quality issues. Iowa DNR should be required to use the information in formulating the 303(d) list.
• The DNR did not use information in the Clean Water Hub. This information is collected by trained volunteers. Iowa DNR should be required to use the information in formulating the 303(d) list. • We support the EPA's analysis that says that "data excluded from the state's analysis must be based on a technical, science-based rationale and not rely solely upon Iowa's 'Credible Data Law'". DNR has been able to use the credible data law to hide the fact that some waters is Iowa are polluted and need to be put on the 303(d) list. The Credible Data Law has allowed DNR to keep the 303(d) list shorter than it should be. It therefore allows polluters to keep polluting.
• I support EPA's analysis that the DNR should not be using the 10% rule to determine if a water body is polluted with nitrate and N, nitrite as N, and nitrate plus nitrite as N. Given that excess amounts of nitrate and nitrite can be injurious to human health, the toxic levels of those substances should force a water body of the 303(d) list.
• In the letter to Ed Tormey and the decision document, EPA noted that they alerted the DNR that the DNR is "not assessing all pollutants with toxic effects with reasonable consideration of the individual pollutant, endpoints, and adverse effects being considered" in their comment letter about the draft 303(d) list. It makes me angry that DNR chose to ignore those comments and did not list the 7 water quality limited segments on the 303(d) list submitted to DNR.
• I support the EPA looking into how the DNR is prioritizing those waters on the 303(d) list for development of TMDLs. I am concerned about how long waters are on the list without a TMDL. I am concerned with the Outstanding Iowa Waters being given lower priority on TMDL development. On the current 303(d) list are numerous water segments that have been on the list since 2006 and 2008, with no TMDL having been prepared. Some of those waters on the list since 2006 and 2008 are designated as Outstanding Iowa Waters pursuant to Iowa's Antidegradation Policy. These waters are entitled to extra protection.

Just as troubling as the many years these Outstanding Iowa Waters have been on the list is the fact that DNR has designated them as low priority for preparing TMDLs. They have been designated as

Tier III and Tier IV, putting them at the bottom of the priority list, essentially condemning them to perhaps never having a TMDL prepared. This is a clear violation of the intent, if not the specific language, of the Clean Water Act. Section 303(d) says the priority ranking must be made "taking into account the severity of the pollution and the uses to be made of such waters." 33 U.S.C. § 1313(d)(1)(A).

- I am concerned that the DNR is not fully implementing the plans to improve water quality that have been identified as part of the TMDL process. Given efforts by the state to reduce income taxes and the programs supported by those taxes, it appears that the TMDLs will not be implemented any time in the near future. The process of listing a water on the 303(d) list should result in water quality improvement in the near future. The 303(d) list and the TMDLs mean nothing if the TMDLs are not implemented.

The state of Iowa needs to come to grips with the excessive amounts of nitrate and nitrite that are entering the water bodies in the state. Along with that, efforts need to begin for setting water quality standards for nutrients. Plus, the state needs to undertake serious efforts to reduce the nutrients entering water bodies, through the TMDL process. Iowa's voluntary Nutrient Reduction Strategy is not working in reducing nutrients in the state's waters.

Finally, I support adding the 7 water quality limited segments to the 2024 303(d).

C Walker

Camie Walker

[redacted]

From: Moni Hayne
To: R7-WaterDivision
Subject: Clean Water Standards
Date: Tuesday, December 17, 2024 2:55:34 PM

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

(1) The DNR is improperly applying the 10% rule to determine nitrate impairments. This rule uses a mathematical calculation developed by the EPA to designate a water as impaired if water samples reveal pollutants 10% of the time. While the EPA supports this rule for a variety of pollutants, it does not do so for nitrate due to its established toxicity.

Not only my grandchildren, but all Iowans deserve to have clean drinking water. I may be able to afford an RO system, but with nearly 50% of the children in my county(Jefferson) on supported school lunches, most of their families need your help!!

Drinking water should never exceed nitrate levels of 10 mg/L ***one hundred percent of the time***. The DNR's methodology for measuring the nitrate levels using the 10% rule is faulty and irresponsible.

(2) The DNR bases the removal or inclusion of impaired waters on the 303(d) list on annual cycles of water data monitoring. But that doesn't take into account the inconsistencies of rainfall and drought over a period of several years. Iowa has had multiple years of severe drought putting more concentrations of chemicals in our water/waterways.

The DNR's approach to adding an impaired waterway identified during a wet year then removing it during a dry year if impairments don't appear present is inconsistent and problematic. It doesn't provide an accurate picture of Iowa's water quality nor does it enable watershed groups to accurately develop plans that can have a meaningful impact on mitigating polluted waterways.

Close to where I live, Lake Darling, has not been clean enough for swimming or recreation for decades! About 10 years ago, the watershed leading to Lake Darling was completely renovated...we could use the lake for about 3 years before it was again too polluted with nitrogen, causing high bacterial counts!! Excuse me?! Why bother to use taxpayer dollars to repair something that is only going to be damaged again.

We need the standards in place to keep our water clean.

This is just one tiny example of all the damaged, dirty, toxic lakes and streams in Iowa.

The Iowa Environmental Council recommends the DNR use a 5-10 year window to evaluate impairments in waterways, a common-sense approach that would give a more accurate assessment of the presence of pollutants.

The DNR's refusal to add these seven segments to the 2024 303(d) list does a disservice to Iowans. Half of Iowa's waterways that undergo tests are impaired, and only half are tested every two years. This is an appalling state of affairs. At the very least, the Iowa DNR should add these water bodies to the 2024 list and do a better job protecting public health.
Sincerely yours,
Moni Hayne

From:	Lisa Ashelman
To:	R7-WaterDivision
Subject:	my comment - DNR Must Be Accountable for our Dirty Water in Iowa!
Date:	Tuesday, December 17, 2024 9:50:04 PM

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,

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Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

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several years. This is another flawed approach.

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Sincerely yours, in Iowa

Dr. Lisa Ashelman, PhD, Hon; MS Psych
Technologies of World Peace
[redacted]

From:	Shawn Richmond
To:	Pratt, David; Paxson, Chelsea (she/her/hers); Robichaud, Jeffery; R7-WaterDivision
Cc:	Christina Gruenhagen; Matt Steinfeldt; Daniel Heady
Subject:	Comments on EPA Region 7 Partial Disapproval of 2024 Iowa 303(d) List
Date:	Wednesday, December 18, 2024 9:47:23 AM
Attachments:	image001.jpg IFBF Comments (12_18_24).pdf

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Thank you for the opportunity to comment on the EPA Region 7 partial disapproval of Iowa's 2024 303(d) list.

Please find comments from Iowa Farm Bureau Federation attached.

Shawn Richmond
Conservation & Natural Resources Policy Advisor
Iowa Farm Bureau Federation
5400 University Avenue | West Des Moines, IA 50266

December 18, 2024

Submitted via email to R7-WaterDivision@epa.gov

Jeffery Robichaud
EPA Region 7
Water Division
Lenexa, KS 66219

RE: Comments on EPA Region 7 Partial Disapproval of 2024 Iowa 303(d) List

The Iowa Farm Bureau Federation (IFBF) appreciates the opportunity to submit these comments to U.S. Environmental Protection Agency Region 7 ("EPA-7") in response to the November 13, 2024, partial disapproval by EPA-7 of Iowa's 2024 303(d) list. IFBF is the state's largest general farm organization with more than 159,000 members. We support voluntary approaches to water quality protection and improvement including development of projects that encourage education, demonstration, and implementation of science-based, proven, voluntary practices that protect water quality.

Regarding the comments submitted by EPA-7 on the 2024 draft 303(d) list, it is extremely troubling that EPA-7 is requiring that the Iowa Department of Natural Resources (DNR) change their assessment methodology. This type of requirement clearly oversteps EPA-7's role and authority. *See* 33 U.S.C. § 1313(d)(2); 40 C.F.R. § 130.7(d)(2). EPA-7 attempting to subrogate this role from DNR goes entirely against the concept of cooperative federalism, especially given that this comes after over 20 years of successful approaches and cooperation on Iowa's 303(d) list. EPA-7's role is to either approve or disapprove listings and is not to dictate the assessment methodology utilized by the State.

In reviewing the comments submitted by EPA-7 to the DNR on the draft 2024 303(d) list and the subsequent response to those comments provided by DNR, we agree with the strong rationale and justification provided by DNR in declining to make the changes requested by EPA-7 in its submission. We also agree with DNR's assessment that EPA-7 failed to provide any scientific or regulatory basis to support its methodology changes or to support the addition of the seven water segments they are proposing.

EPA-7 claiming the 10% binomial rule is "non-defensible" does not make it so, especially given the long-standing acceptance by EPA-7 of how this data analysis rule has been applied in the past by Iowa and other Region 7 states. EPA-7 has provided no supporting rationale or justification in their comments or decision document to support this claim. Contrary to EPA-7's assertion that the binomial rule utilized by DNR is "non-defensible", 10% binomial exceedance approaches are well-recognized and accepted statistical approaches that are commonly applied to environmental monitoring datasets and analyses.

Additionally, EPA-7 appears to be intentionally concealing information from the public about both the data source and the percentage of samples exceeding 10 mg/L in Table 1 of the decision document by not including a column showing the total number of samples taken during the data ranges listed. For example, reviewing the existing and readily available data provided by

DNR, all the additional segments are below 10 mg/L 94% of the time or better. One segment proposed to be listed is below 10 mg/L 99.3% of the time and another 98.5% of the time reviewing current data. Despite EPA-7 claiming that the 10% rule is non-defensible, this information should be included to ensure full transparency for review, especially since EPA-7 has provided no scientific basis for nullifying use of the 10% rule.

The data presented by EPA for the seven segments does not match the existing and readily available water quality data, and EPA's refusal to identify the data set or the source of the data makes it suspect. For transparency and confidence in the process, the public has the right to know where the additional data came from, to see the full data set, to know whether the samples were taken properly or processed according to proper QA/QC procedures including within the prescribed time frame, and have the opportunity to comment. The public should be allowed the information to decide for themselves whether the cited numbers accurately represent the water quality for those segments. Listing these segments as impaired misrepresents the available data and misleads the public with an assertion that these water segments are toxic and polluted.

Further, EPA inconsistently sets water quality standards for drinking water designated uses. Nitrate seems to be the only evaluated constituent where raw surface water is required to meet finished drinking water standards. Raw surface water is exposed to the elements, and it is reasonable to expect that it be treated prior to distribution to a water system. Further, nitrite and nitrate are not considered "toxic" under the Clean Water Act as opined in the EPA-7 partial denial letter. Nitrogen is required to sustain life, and it appears naturally in the environment. It is not listed as a toxic pollutant in the Clean Water Act or its implementing regulations found in 40 C.F.R. § 401.15. EPA-7 should refrain from such inaccurate descriptions of nitrogen, nitrate, or nitrite in future decision documents. The standard applied in the future to surface water used for drinking water should consider that the Safe Drinking Water Act requires raw surface water to be treated or blended to meet drinking water standards.

Given the major departure from the well-established and accepted historical policy on reviewing impaired waters lists that this decision document is proposing, we also have serious concerns that EPA-7 actions are inconsistent with the requirements of the Administrative Procedures Act (APA) by not conducting a formal rulemaking process regarding its proposed changes, which could put EPA-7 at risk of litigation. Under current rules, the list approved by EPA-7 must meet the requirements of 40 C.F.R. 130.7(b). *See* 40 C.F.R. 130.7(d)(2).

In this decision letter, EPA gives itself new authorities to approve or disapprove the state's long-standing, previously accepted data analysis methodology in conflict with current rules and statutes. Decision letter p. 13-14; *See also* 33 U.S.C. § 1313(d)(2); 40 C.F.R. § 130.7(d)(2). EPA-7 also changed the status of nitrate and nitrite from a conventional pollutant to a toxic pollutant without providing appropriate notice and comment under the APA for the rule change. *See* 40 C.F.R. § 401.15. Based on this new methodology and status, it found seven stream segments as impaired which also do not meet the requirements of 130.7(b) with the use of phantom data that has not been described or identified as required under 130.7(b)(6)(ii). These actions and findings change the regulatory requirements for submission and review of the integrated lists. Such legislative rulemaking requires formal rulemaking, including a notice and comment period, which is lacking in this instance. *See* 5 U.S.C. § 553; *Iowa League of Cities v. E.P.A., 711 F.3d 844 (8th Cir. 2013), enforced sub nom. Iowa League of Cities v. Env't Prot. Agency, No. 11-3412, 2021 WL 6102534 (8th Cir. Dec. 22, 2021).* As a result, EPA-7 should

reconsider these actions and findings and not add the additional seven stream segments to Iowa's integrated list.

In conclusion, IFBF finds that the 2024 303(d) list as prepared and submitted by DNR in June 2024 should be approved by EPA-7 as submitted after assessing the rationale and justification submitted to EPA-7 by DNR, EPA's submitted comments and its decision letter. IFBF objects to the EPA-7 finding of seven additional segments as impaired, adding stream segments for which supporting data has not been identified and to all changes imposed by EPA-7 regarding Iowa's assessment methodology and evaluation process.

From: Md
To: R7-WaterDivision
Subject: Water quality in Iowa
Date: Wednesday, December 18, 2024 1:32:17 PM

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

(1) The DNR is improperly applying the 10% rule to determine nitrate impairments. This rule uses a mathematical calculation developed by the EPA to designate a water as impaired if water samples reveal pollutants 10% of the time. While the EPA supports this rule for a variety of pollutants, it does not do so for nitrate due to its established toxicity.

Consuming water laden with nitrate levels of 10 mg/L or more endangers public health. It can cause methemoglobinemia, blue baby syndrome, a fatal condition in infants. Studies link consuming high nitrate levels to colorectal, kidney, ovarian, stomach and thyroid cancers as well as birth defects.

Drinking water should never exceed nitrate levels of 10 mg/L ***one hundred percent of the time***. The DNR's methodology for measuring the nitrate levels using the 10% rule is faulty and irresponsible.

(2) The DNR bases the removal or inclusion of impaired waters on the 303(d) list on annual cycles of water data monitoring. But that doesn't take into account the inconsistencies of rainfall and drought over a period of several years. This is another flawed approach.

During drought years, rivers and streams flow less and conceal impairments. In wet years, as we saw this spring, rivers and streams that previously appeared unimpaired contain high levels of nitrate and phosphorus pollutants released by the heavy rainfall. The DNR's approach to adding an impaired waterway identified during a wet year then removing it during a dry year if impairments don't appear present is inconsistent and problematic. It doesn't provide an accurate picture of Iowa's water quality nor does it

enable watershed groups to accurately develop plans that can have a meaningful impact on mitigating polluted waterways.

The Iowa Environmental Council recommends the DNR use a 5-10 year window to evaluate impairments in waterways, a common-sense approach that would give a more accurate assessment of the presence of pollutants.

The DNR's refusal to add these seven segments to the 2024 303(d) list does a disservice to Iowans. Half of Iowa's waterways that undergo tests are impaired, and only half are tested every two years. This is an appalling state of affairs. At the very least, the Iowa DNR should add these waterbodies to the 2024 list and do a better job protecting public health.

Sincerely yours,
Maralyn Schulze
Marshalltown, Iowa
Sent from my iPhone

From: Jo Ann Sadler
To: R7-WaterDivision
Date: Wednesday, December 18, 2024 3:04:37 PM

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

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Sincerely yours,

Jo Ann Sadler
Correctionville, Iowa

From: Linda Quinn
To: R7-WaterDivision
Subject: Oversight needed for Iowa DNR
Date: Wednesday, December 18, 2024 4:37:32 PM

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

You've no doubt heard rationale and supporting evidence from the experts. I'm no expert but I do paddle some of Iowa's impaired waterways. And find it very, very sad to see our waterways in such a state of damage, and devoid of the bird and aquatic life. A healthy stream with vegetated banks is hard to come by where I live in eastern Iowa.

The DNR's refusal to add these seven segments to the 2024 303(d) list does a disservice to Iowans. Half of Iowa's waterways that undergo tests are impaired, and only half are tested every two years. This is an appalling state of affairs. At the very least, the Iowa DNR should add these waterbodies to the 2024 list and do a better job protecting public health.

A federal agency as yours, EPA, is so needed to help our state do the right thing; to place the environment and people above corporations and politics that are running amuck in Iowa. Please require the DNR to do its job to protect me and all Iowans from toxic water!

Sincerely,

Linda Quinn of Iowa City

From: Mcintosh, Tamara
To: R7-WaterDivision
Subject: Iowa DNR"s comment, re: 303(d) list
Date: Thursday, December 19, 2024 9:38:41 AM
Attachments: DNR comment to EPA - 303(d) list (Dec 2024).pdf

See attached.

Thank you.
TMM

Tamara McIntosh
General Counsel
Legal Services Bureau
Iowa Department of Natural Resources
6200 Park Avenue, Suite 200
Des Moines, IA 50321
[redacted]
www.iowadnr.gov

IOWA DEPARTMENT OF NATURAL RESOURCES

GOVERNOR, KIM REYNOLDS
LT. GOVERNOR, CHRIS COURNOYER
DIRECTOR, KAYLA LYON

December 19, 2024 **VIA E-MAIL**

EPA - Region 7
ATTN: Jeffery Robichaud
11201 Renner Blvd.
Lenexa, KS 66219

RE: comment in response to EPA's partial disapproval of Iowa's 303(d) list

Mr. Robichaud:

The Iowa Department of Natural Resources (DNR) objects to the EPA's November 12, 2024, decision to partially disapprove Iowa's 303(d) list because the EPA's letter contains several legal errors. DNR also objects to the letter's implication that some of Iowa's water is not safe, and that DNR is not meeting either the letter or the spirit of the law.

DNR agrees that nitrate is a harmful pollutant, and has created a water quality standard specific for surface drinking water sources consistent with this reality. This standard and its associated monitoring and testing methodologies are based on rigorous science and are protective. And it works: Iowa's out-of-faucet finished drinking water has a near-perfect compliance rate of 99.6% with the federal Safe Drinking Water Act's (SDWA) nitrate maximum contaminant level (MCL).[1] The tiny fraction of public water supplies that failed to hit the mark have subsequently installed more protective treatments or have acquired an alternative source.

The EPA approved Iowa's nitrate water quality standard for surface drinking water sources over 20 years ago. The EPA has likewise approved Iowa's 303(d) list based on that standard for just as long. The standard has not changed in the interim, and the EPA hasn't had concerns with the standard until now. Ultimately, the goal of both the EPA and DNR is the same: to ensure that Iowa's surface drinking water sources meet water quality standards so that, in turn, Iowa's tap water is safe to drink. It is safe.

While nitrate is a consequential and harmful pollutant, the EPA has never legally classified nitrate as a "Toxic Pollutant" under the CWA. Congress specifically mandated that the EPA "shall . . . list" all CWA-designated toxic pollutants in a table.[2] That table contains 65 pollutants but, notably, nitrate is not among them.[3] Nor is nitrate on EPA's alternative toxic "Priority Pollutants" list, which has 129 pollutants.[4] Yet, the EPA is suddenly demanding that Iowa act as if nitrate is one of these collective 194 pollutants. It is not. There is legal and scientific significance to listing nitrate as a "Toxic Pollutant" under the CWA, including more costs, regulatory oversight, and burdens. In the end, listed or not, Iowa's drinking water must meet SDWA's nitrate MCL, which it does.[5]

[1] The DNR's Public Drinking Water Program 2023 Annual Compliance Report available at: https://www.iowadnr.gov/Portals/idnr/uploads/water/wse/2023%20Iowa%20Drinking%20Water%20Annual%20Compliance%20Report.pdf (as of Dec 17, 2024)
[2] 33 USC § 1317(a)(1)
[3] 40 CFR § 401.15
[4] 40 CFR Part 423, Appendix A
[5] *Supra*, FN 1

As this shows, the EPA is violating federal law in several ways. For one, the EPA's treatment of nitrate as a *de facto* listed Toxic Pollutant is illegal rulemaking under the Administrative Procedure Act.[6] So too is the EPA's treatment of its multitude of guidance documents and website statements as binding when, by law, they are not.[7] Second, the EPA's patchwork approach to nitrate across the country violates the Administrative Procedure Act for being arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.[8] Some states mirror Iowa's approach to assessing nitrate in surface drinking water sources whereas others don't test at all. In other words, the EPA is holding Iowa to a very high standard that it does not enforce elsewhere. Third, the EPA is required by the CWA to evaluate Iowa's 303(d) list only against DNR's applicable, duly enacted, and EPA-approved water quality standard, not against what the EPA wishes the standard was.[9]

Furthermore, the EPA refused to explain or provide its reasoning, data, and methodology behind its partial disapproval. Both the DNR and the public are expected to provide comments on the EPA's decision, yet not all of the information is available. DNR takes great effort to explain its decisions and to provide data to the public, such as through the AQuIA and ABDNet databases, which have comprehensive historic monitoring and assessment data;[10] the EPA should hold itself to the same standard.

Therefore, the DNR requests that the EPA withdraw its partial disapproval. Absent a withdrawal, DNR demands that the EPA establish loads for the identified impaired waters consistent with 40 CFR § 130.7(d)(2) and provide the public an opportunity to review and comment by publishing in the Federal Register.[11]

Sincerely,

Kayla Lyon, Director

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[6] *See, e.g., Iowa League of Cities v. E.P.A.*, 711 F.3d 844 (8th Cir 2013) *and* 5 USC § 553; *see also Loper Bright Enterprises v. Raimando,* 144 S.Ct. 2244, 2261 (June 2024).

[7] Notwithstanding Congress' "shall list" mandate, the EPA has the following statement on its website: ""The list was intended . . . as a starting point. . . .Portions of both lists are outdated. As such, the pollutants on these lists are not the only ones regulated. . . ." available at: *https://www.epa.gov/eg/toxic-and-priority-pollutants-under-clean-water-act (as of Dec. 16, 2024); see also supra* FN 6.

[8] 5 USC § 706(2)(A)

[9] 33 USC § 1313(d)(2) *and* 40 C.F.R. § 130.7(d)(2); *see also* 40 CFR § 131.20(b) *and* 40 CFR part 25 (detailing public participation processes around establishing or modifying water quality standards)

[10] ADBnet database available at::
https://programs.iowadnr.gov/adbnet/#:~:text=ADBNet%20is%20an%20online%20database,state%20water%20quality%20standards%2C%20and (as of Dec 17, 2024)

[11] *See, e.g.,* 119 Fed. Reg. 51884 (June 20, 2024) (containing the EPA's 303(d) list decision for Arkansas and formally soliciting public comment)

From:	Caitlin Golle
To:	R7-WaterDivision
Subject:	Public comment submission - concerning the decision to add seven water quality-limited segments to Iowa's 2024 303(d) list
Date:	Thursday, December 19, 2024 10:10:51 AM
Attachments:	IowaCCI 12.19.24 public comment EPAr7.pdf

Dear EPA region 7,

Please see our letter and comments in the document attached. This letter presents ~100 public comments and ~500 names signed onto our cover letter requesting transparency and accountability from the Iowa DNR, by requiring the 7 impaired water segments to be added to the 2024 Iowa's Impaired Waters List.

We look forward to your response.

Thank you,

Caitlin Golle ***(She/Her)***
Community Organizer:Farming & the Environment
Iowa Citizens for Community Improvement
Cell: [redacted]

Iowa Citizens for Community Improvement
We talk. We act. We get it done.

2001 Forest Avenue
Des Moines, IA 50311
Ph 515-282-0484
www.iowacci.org
Facebook/iowacci

To: R7-WaterDivision@epa.gov **12/19/14**
Jeffery Robichaud
Water Division
U.S. EPA Region 7
11201 Renner Blvd
Lenexa, KS 66219
From: Members and supporters of Iowa Citizens for Community Improvement

Re: Concerning the decision to add seven water quality-limited segments to Iowa's 2024 303(d) list.

Dear Mr. Robichaud and to those it may concern at the Environmental Protection Agency,

As the people of Iowa, many of us have grown up playing in our waterways and continue to enjoy them to this day. The Cedar, Des Moines, Iowa, Racoon, and South Skunk Rivers are places of importance to us.

Any water in Iowa that is impaired should be recognized as such, especially for nitrate pollution and contamination. Nitrates in our water pose a very serious problem in Iowa, with consequences to our health. We should have the right to clear and transparent water quality reporting data if there is any hope to improve. That means that the DNR must hold themselves to the highest standard and adapt their methodology on ethics and worst-case impact to human health and drinking water supplies.

We want our water quality in Iowa to improve. It will not if we continue to allow for lax regulations and loopholes.

Please enforce the addition of these seven water quality-limited segments to Iowa's 2024 303(d) list so that it may reflect 712 WALSs for 581 water bodies listed.

Based on ethics and the security of our health and environment, we support the EPA's request for the Iowa DNR to revise assessment of class "C" waters, remove the non-defensible use of the 10% rule in relation to nitrate and any other pollutants with toxic effects treated as conventional pollutants, and to assess pollutants with toxic effects with reasonable consideration of the individual pollutant and potential adverse effects.

Without strong enforcement, our waters and communities bear the burden of unacknowledged risk and a false sense of improvement.

We want the best for Iowa, our environment, water and people - and upholding the Iowa DNR to high standards is an important step to moving towards a healthier Iowa.

Thank you for standing up for our water,

501 Members and supporters of Iowa Citizens for Community Improvement.

Margot Bilanin from Iowa City, IA - “A balance of ag practices w/ clean waterways is our right as a tax paying citizen of this state.”

Jenn Boccella from Ankeny, IA - “Accurate date is paramount.”

Mark Edwards from Boone, IA - “After working for the Iowa DNR for 30 years, starting the Water Trails Program, and reducing erosion from human use I am appalled at the lack of concern for our water by the DNR and the public. Thank you for stepping in and enforcing the law.”

Carolyn Uhlenhake -Walker from Des Moines, IA - “All people have a right to clean water!!!!! Water quality is at crisis-level here in Iowa! We must act now!”

Sharon Moss from Iowa city, IA - “All seven impaired segments should be added to the 2024 Impaired Waters list - especially since companies were given the green light to pollute”

Linda Fitzgerald from Cedar Falls, IA - “As a citizen of the Cedar River watershed, who has been doing nitrate sampling through 2024, from drought to flood to drought, and as an avid kayaker, I am dismayed at the refusal of Iowa DNR to add to the Impaired Waters list. Please enforce the additions to the 2024 list.”

Tim Glaza from Des Moines, IA - “Clean up our water!”

Clare Smith-Larson from Altoona, IA - “Come on and SHAPE up.”

Christine Schlotfelt from Iowa City, IA - “Current and future Iowans deserve clean water. Prove that Big Ag doesn't own our state and add these impaired waters to the list.”

Jacquelyn Smith from West Des Moines, IA - “DNR help us clean up rivers. Streams, lakes n all water in Iowa it is your responsibility to see we have clean water to drink and for recreation”

Mary Woolever from Ankeny, IA - “DNR Protect our drinking water! Please do your Job DNR. Keep all of us safe! Thanks.”

Patricia Bowen from Iowa City, IA - “Do your job DNR. or does DNR really stand for Do Nothing Really? That's what I've been saying for years. Prove me wrong.”

Ann Zerkel from Iowa City, IA - “Do your job! All our lives depend on you!”

David Andrews from Ames, IA - “Go get'em!”

Karen Manning from Maquoketa, IA - “Good information and high standards are what Iowans expect and deserve from our DNR.”

Virginia Meyer from Lone Tree, IA - “Help us with our fight for clean water because our DNR will not.”

Rachel Mills from Cedar Rapids, IA - “HIGH Standards are what the DNR is responsible for!”

Margo Vanderhill from Alton, IA - “I am concerned that the high nitrate levels will affect the health of my granddaughters. If left off the list, I cannot even find out which water is impaired!!!”

Carol Tack from Decorah, IA - “I am very concerned about the water quality in Iowa. I have read that about half of our waterways are impaired and it could even be more. We have the 2nd highest cancer rates in the country and nitrates cause cancer.”

Susie Petra from Ames, IA - “I do deserve clean water. Actually, so do you and the ones you love. So: enforce high standards! Add the newest seven impaired water segments! Enforce cleaning up our waters! Please, please help us. Help us get the action we deserve, to clean up our waters! I learned to swim in these waters, and my brother & I fished with our dad, in these waters. Today, I would not risk doing either. And this degradation has happened in my lifetime! Please”

Sally Hartman from Iowa City, IA - “I don't know anyone that actually wants polluted water in Iowa. Please get on the stick, add seven impaired water segments to the list of Impaired Waters, and add buffer zones to streams, lakes and rivers. Our lives depend on it!”

Zack Jones from Malvern, IA - “I live in Southwest Iowa where there was a recent spill In Red Oak. It is very clear water quality is not a priority. The 2 most important things are water and air. I wish todays is leadership thought more about what we are leaving for future generations. Besides ongoing destruction of habitat and ecosystems. We need more focus on the balance of life in all respects”

Nancy Bakken from Cresco, IA - “I live surrounded by hog operations, with a river, the Upper Iowa River, only 300 yards down the hill from three facilities, and then running through our farm. It is imperative that Iowa DNR provides Iowans with the truth about our water quality all across the state.' Kristin Erickson from Decorah, IA 'I support enforcing high standards on the Iowa DNR by adding all seven impaired segments to 2024 impaired waters list. The threat to our health in Iowa is our number 1 issue.”

Janet Miller from Ackley, IA - “I urge you to ensure transparency and accountability in water quality reporting. Ignoring these impaired segments undermines public trust and jeopardizes efforts to safeguard community health and the environment. Let's prioritize accurate data and proactive measures to protect our vital water resources. Iowa has the second highest cancer rate in the nation!”

Carol Boyce from Dysart, IA - “I was just diagnosed with cancer, and several others I know have also been recently diagnosed. I am a kayaker also, and I find it difficult to find places to kayak that aren't contaminated with pollutants in Iowa. Please ensure the DNR complies with regulations. I'm saddened by the state of Iowa's waterways”

Deb Van Horn from Decorah, IA - “If there's something to hide then there is definitely a concern. Something of this nature requires total transparency. Ignorance is not bliss and not informing the public of a potential hazard to their health is deceitful and reprehensible.”

Joy Scanlan from Massena, IA - “If we don't have clean water, we don't have healthy animals to eat, our babies die, and the vegetables we eat bring more poison into our bodies. What's left? God will find other things to do with this world that will not include humans.”

Danielle Wirth from Woodward, IA - “In Iowa, the Iowa DNR is fully owned by the Iowa Farm Bureau. Family farms are disappearing, and with them, the small towns in Iowa where engaged citizens acted to protect their local communities. We can no longer allow our children to swim in surface waters. Wildlife, including game fish and mammals we hunt for food, are disappearing or are sick with disease. The DNR must comply with water quality standards that protect citizen's rights to Life, Liberty and the Pursuit of Happiness.”

Dan Freeman from St. Ansgar, IA - “Iowa DNR also needs to determine how much water are in the Aquifers, before any private corporation well permitting Protect Iowa's water!”

Dan Hill from Iowa City, IA - “Iowa DNR exists to enhance the quality of life for Iowans, improve Iowa's natural resources and ensure a legacy for future generations. Why is the DNR refusing to comply?!”

Barbara and Jim Dale from Decorah, IA - “Iowa has lost its status as a desirable state to live and work in, largely due to the contamination of our waters. We must remediate this situation. Our health and our economy rely on accurate and conscientious testing. We must know the status of our water continuously. Nothing can be more important to our state than clean water.”

David Stickrod from Glenwood, IA - “Iowa has the highest cancer rate and the worst water quality in the country, combined with rising numbers of corporate animal farms. Get a clue EPA. Help us!”

Virginia Paulson from Iowa City, IA - “Iowa is 2nd highest in the country for cancer and 44th in the nation for health care provider access. We must stop turning our environment into a chemical wasteland. Iowa is going in the wrong direction. Let us clean up our soil and water and keep Iowa habitable for ourselves, our children, our grandchildren, and all future generations.”

Jack Mithelman from Urbandale, IA - “Iowa is extremely high cancer rates are directly related to our poor water quality. We BEG the EPA to take forceful action against Iowa DNR to correct this.”

Zita Cashin from Conrad, IA - “Iowa residents health is being impacted due to the current water quality, resulting in one of the highest levels of cancer in the US. We NEED CLEAN WATER!”

Barbara Beaumont from North Liberty, IA - “Iowa won't do anything to clean up the water unless it is forced to do so.”

Rodger Routh from Ankeny, IA - “Iowans deserve and demand clean water and the DNR must Do Its Job!!!”

Alene Rickels from Iowa Falls, IA - “Iowans deserve clean water in their environment. Please protect our waters. Please take all steps to ensure our water in Iowa is safe. Iowans deserve clean water.”

Barbara Kalbach from Dexter, IA - “Iowans have been living with impaired waterways for many years now. There has been no effort by our state government to slow the livestock, chemical, & fertilizer run-off that enters our lakes, streams & rivers every year. As a #2 cancer state, it is time for our GOP Legislature & Governor to address this!! The Iowa DNR & the State of Iowa have ignored our increasing water impairment for many years. Please do not allow them to ignore the EPA, too.”

Laurie Klosterboer from McGregor, IA - “Iowa's DNR needs to monitor not only water quality (against the governor's wishes) but also monitor the quantity. Our 10,000 large animal operations, tech centers, and possibly hundreds of miles of CO2 pipeline will dry up our aquifers quickly. What comes first, drinking water for everyone or someone's profits? Thank you for overseeing our waters! It's time to address Iowans' water quality -- we can only get drinking water locally, and Iowa's local sources are full of nitrates and ag chemicals. Cancer rates in our state are growing annually. Don't put this off any longer, please!”

Robin Arnold from West Des Moines, IA - “Iowa's drinking water problem needs addressed! It has only gotten worse each year. Please enforce accuracy of correct data collection to aid in real solutions. Thank you!”

Mike Delaney from Windsor Heights, IA - “Iowa's water is not as bad as some people think. We need transparency so that Iowans know the truth. Sweeping bad news, like the Nishnabotna spill, under the rug is not acceptable. Iowa politicians and the DNR can no longer be trusted to protect our health.”

Mary Taft from Iowa City, IA - “Iowa's water quality must be monitored by the DNR. It is its function. Do your job!”

Jeff Milks from Oelwein, IA - “Is it any wonder that Iowa has the second highest cancer rates in the nation?? This is on YOUR WATCH!!”

Deverie Kiedaisch from Keokuk, IA - “It is essential for Iowans to have clean water for our very survival.”

Renee Grummer Miller from Cedar Rapids, IA - “It’s time to improve the health of Iowans by cleaning up our water. Please enforce high standards on the Iowa DNR by adding all seven impaired segments to the 2024 Impaired Waters list.”

Melissa Silver from Iowa City, IA - “It's important to have accurate data so we make the best, most informed decisions. Thank you, Melissa Silver”

Ron Melsha from Solon, IA - “It’s time to give the DNR full power and stop the Farm Bureau from poisoning the state. Clean water and air for everyone.”

Leslie Davis from Marshalltown, IA - “List all impaired waterways.”

Martin White from Clive, IA - “Make the DNR do the right thing for the people of this state.”

Susan Moore from Fort Dodge, IA - “Nitrates are high in the water in this state! Iowa is one of (if not the most) states with highest cancer rates.”

Daniel Bennett from LeClaire, IA - “No action is NOT an option. STOP letting our so called “farmers” pollute our state without consequences. Make our legislators understand that the almighty dollar is NOT the goal! Clean and safe drinking water is!!!”

Jim Walters from Iowa City, IA - “Our government in Iowa has been captured by people who do not care about clean water and the safety of our citizens. It is up to the EPA to do something about this.”

Jeff Adams from Eldora, IA - “Please Don't make me lose trust in the DNR.”

Beverly Butler from Mason City, IA - “Please enforce high standards on the Iowa DNR by adding all seven impaired segments to the 2024 Impaired Waters list. Everyone deserves clean water.”

Rachel Mithelman from Urbandale, IA - “Please enforce the addition of these 7 impaired waterways to the list. We must protect Iowa's rivers and streams, and since the DNR is unwilling, we truly need your assistance on this.”

Melissa Erickson from Boone, IA - “Please help Iowans have safer drinking water.”

Louise Kaufman from Mason City, IA - “Please HELP us.”

Martha McCormick from Ames, IA - “Please please look out for us Iowans. We cannot make sure the right laws are in place for Iowans but u can. Please do your job to protect our water.”

Becky Evans from Des Moines, IA - “Please protect our drinking water, a most basic right for all Iowans.”

Janet Wilson from Iowa City, IA - “Please protect the people and our life blood, that is the water and soil on which we stand and depend on for life itself. Please, this is why you have the job and responsibilities you have. You were not elected to pad your own pockets or to bring big businesses that will over use and pollute our livelihood and poison our the environment which supports all of our lives. This is your job. Please do it. Thank you. Janet Wilson.”

Nick Schutt from Alden, IA - “Please protect the people you work for! Please do your job protecting the people and not the special interest groups. Thank you”

Maureen McCue from Oxford, IA - “Please, for our health and all those who share our environment, let's get the information we need to protect all of us!”

Hugh Espey from Des Moines, IA - “Put these 7 water segments on our impaired waters list, now!! Iowa DNR is trying to hide the truth -- EPA needs to put people before polluters! We need to crack down on water pollution. Nitrate in our drinking water can make us sick. Iowa has had over 700 impaired waters for the past 10 yrs -- it's not getting any better. Iowa DNR needs to work with grassroots Iowans to fix the problem, not ignore it!”

Kimberly Smith from Altoona, IA - “Thank you for your diligent work. Our government turns a blind eye to the concerns and problems of this state. When will they care enough to take action?”

Russ Ver Ploeg from Des Moines, IA - “The DNR needs to address residents' concerns about water quality rather than ignore what ag and other businesses do to our water ways.”

Martin Monroe from Des Moines, IA - “The Federal government should hold States accountable, for misrepresenting the citizens, in favor of Pipeline Profiteers! The Governor and Legislative leaders are directing the DNR and Utilities Board to censor any opposition to the Pipeline Racketeers. Any member of Iowa's Legislature who has stock or stand benefit financially, from the Pipelines or other

Private Investments are ethically required to Not Vote, on legislation regarding personal profiteering, or using their public position to profit personally or supporting family members as well."

Joshua McDonald from Iowa City, IA - "The only way we will keep our country strong and safe is to have honest, and transparent government agencies, at all levels, working with industry and the people. Water quality data belongs to the people."

Victoria Springer from Grinnell, IA - "The residents of Iowa suffer from questionable outdated water systems and unsafe swimming and recreation options due to the disgusting state of rivers, lakes and streams. Whole countries have banned the poisons used on Iowa crops which causes cancer and Parkinsons disease. Science matters. Help!"

Nancy Huisinga from Des Moines, IA - "The time is NOW to take recommendations and advisement regarding water quality from DNR. I have no grandchildren, but many of you may. They deserve to grow up with clean, clear waterways in our state."

Gerry Hanson from Parnell, IA - "The water usage from ethanol and carbon capture will drain our aquifers! Good luck trying to farm after that happens! Nobody will want to live in an area with ethanol production, pipelines and water. This must stop!!!!!!!!!!!"

Shari Hawk from Ankeny, IA - "This is the absolute minimum that must be expected to assure Iowans are protected from the effects of our polluted waterways."

Lynn Underberg from Dayton, IA - "This is unacceptable. Not informing the public of known risks to water supplies is negligent. What is standing in your way from just doing the right thing?"

Roxanne Jackson from Hanlontown, IA - "water is a precious resource--don't take it for granted. Protect Iowans right to clean water, stop giving our water to any large for-profit corporation that puts our access to water in jeopardy."

Silvia R Cianzio from Des Moines, IA - "Water is an essential component of our bodies and life, its quality impacts all sources of life and health, for us humans and for every being organisms that cohabit our planet. It is imperative that all of us have access to clean and pure sources of water, to assure our planet and the future generations. Please, acct accordingly, and maintain transparency in all areas related to survival of our resources, and those in the planet. Be honest, responsible, and well intentioned on the actions you All take. Please, protect Iowans health wellbeing!!!!!!!!"

Paige Liebrecht from Coralville, IA - "Water pollution kills people"

Bonnie Murphy from Coralville, IA - "Water quality in Iowa is very important and has been declining in ways that are under our control if we have the will to do the right thing."

Beverly Ross from Kellogg, IA - "WATER SAFETY IN IOWA IS URGENT"

David and Mary Timmer from Pella, IA - "We could safely play in waterways with our children; but our grandchildren cannot. Time for a change."

Susan Beary from Lovilia, IA - “We deserve to know about high nitrate levels that can harm our health. the DNR needs to add the 7 segments to the impaired waters list. citizens deserve transparency on this.”

Darlene Clark from Dubuque, IA - “We do not want or need high nitrate levels. Protect all Iowans! Please.”

Cindy Pospisil from Mt Vernon, IA - “We have 2 farm rental properties that we have installed reverse osmosis equipment due to high nitrate levels.”

Todd Southworth from Waterloo, IA - “We haven't been able to drink our own well water for years - nitrates, and we aren't even farmers!”

Rosalind Andersen from Davenport, IA - “We need clean water without nitrates and an EPA that supports the people.”

Dennis Den Hartog from Fort Dodge, IA - “We need cleaner water for all of us.”

Erin Garity from West Des Moines, IA - “We need water quality transparency. How are we to know what is in our water, and how it could affect us if we don’t have access to the data. This is a right all Iowans and Americans should have.”

Daniel DeShane from Coal Valley, IL - “WHAT IS WRONG WITH IOWA?”

Lawrence Ginter from Rhodes, IA - “With climate change and drought it is important that we protect Iowa's water supply and our rivers and lakes.”

Patricia Fuller from Council Bluffs, IA - “Yes, thank you for standing up for water. We cannot continue to play politics when it comes to our impaired waters affecting our health, we have the second highest rate of cancer in the nation. This might very well be due to the excessive amount of nitrates in our water due to the huge amount of Confined feeding operations and massive agriculture overuse of fertilizer”

Lori Hauenstein from Nevada, IA - “You are there to serve all Iowans and not just agricultural interests. We are the only state with rising cancer rates. No wonder our state has a brain drain. Pigs over people and large corporate farms seem to be the only groups served by DNR.”

Edward T. Hotchkin from Des Moines, IA - “You may try to pull one over on us, but you can't fool our health. The truth will come out!!!”

Arie Sirotiak from Ames, IA

Dennis Goodrich from Ames, IA

Diane Pierce from Ames, IA

Donna Prizgintas from Ames, IA

Jo Ann Kovar from Ames, IA

Josephine O'Donnell from Ames, IA

Mary Sand from Ames, IA

MJ Banwart from Ames, IA

Rae Hattan from Ames, IA

Robert Ryerson from Ames, IA

Ruth Barnett from Ames, IA

Steven Pecenka from Ames, IA

Tessa Brow from Ames, IA

Walter Neal from Ames, IA

Ellen Hansen from Ankeny, IA

Eva Moritz from Ankeny, IA

Jane Alderman from Ankeny, IA

Kathy Graeve from Ankeny, IA

Kathy Avey from Ankeny, IA

Melissa Owen from Ankeny, IA

Patricia Carlson from Ankeny, IA

Paul Carlson from Ankeny, IA

Terri Burton-Wire from Ankeny, IA

Terri Hannan from Ankeny, IA

Vicki Bowman from Ankeny, IA

Bernard Webb from Ankeny, IA

Dixie Webb from Ankeny, IA

Kerensa Good-Bloyd from Bettendorf, IA

Marilyn Hawthorn from Bettendorf, IA

Theresa Johnson from Bettendorf, IA

Janet Vielhaber from Bondurant, IA

Jo Kassel from Boone, IA

Lydia Hayes from Calmar, IA

Jerry Uhlman from Carlisle, IA

Mary Allen from Carter Lake, IA

Jon Linn from Casey, IA

Bob Condra from Cedar Falls, IA

Melissa Heston from Cedar Falls, IA

Marian Kuper from Cedar Falls, IA

Ashley Pastor from Cedar Rapids, IA

Julie Hanson from Cedar Rapids, IA

L. Darrel Wrider from Cedar Rapids, IA

Mindy Kruckenberg from Cedar Rapids, IA

Nicole Weber from Cedar Rapids, IA

Rev Curt Miner from Cedar Rapids, IA

Tom Mohan from Cedar Rapids, IA

Beth Herrick from Cedar Rapids, IA

April Beth Wiles from Charles City, IA

Sharon Lawson from Clinton, IA

Linda Lonn from Clarinda, IA

Kathleen Serino from Clive, IA

Tamara Holmes from Coon Rapids, IA

Matt McAndrew from Coralville, IA

Barbara Akre from Coralville, IA

Jane Knoedel from Coralville, IA

Phil Klein from Coralville, IA

William Pusateri from Coralville, IA

Matthew Olive from Corning, IA

Jo Ann Sadler from Correctionville, IA

Jeremy Menard from Council Bluffs, IA

Thomas Reardon from Council Bluffs, IA

Steve Hultman from Crescent, IA

Peggy Noel from Creston, IA

Barb Buckton from Cumming, IA

Harold Moody Jr. from Davenport, IA

Kathleen Murtey from Davenport, IA

Leslie DuPree from Davenport, IA

Mary Rehmann from Davenport, IA

Michael Hustedde from Davenport, IA

Roy Birchard from Davenport, IA

Sharon Kendall Dunn from Davenport, IA

David Dunn from Davenport, IA

Carolyn Corbin from Decorah, IA

Christine Kilarski from Decorah, IA

Erik Sessions from Decorah, IA

M J Borelli from Decorah, IA

Marc Oyloe from Decorah, IA

Mic Martin from Decorah, IA

Patsy Martinson from Decorah, IA

Steve Gude from Des Moines, IA

Adam Mason from Des Moines, IA

Barbara Klubal from Des Moines, IA

Beth Wilson from Des Moines, IA

Bill Nassif from Des Moines, IA

Brian Kennedy from Des Moines, IA

Dan Ketchum from Des Moines, IA

Donald Shepherd from Des Moines, IA

Eric Saylor from Des Moines, IA

Evan Schultz from Des Moines, IA

Gina Schlesselman-Tarango from Des Moines, IA

Hal Rusk from Des Moines, IA

Holly Hallman from Des Moines, IA

Jake Grobe from Des Moines, IA

Janet Romine from Des Moines, IA

JEAN O'Donnell from Des Moines, IA

Jeanie Hagedorn, chm from Des Moines, IA

Jen Sinkler from Des Moines, IA

Jody Gibson from Des Moines, IA

John C. Holveck from Des Moines, IA

Julia Rendon from Des Moines, IA

Juliann Woodhouse from Des Moines, IA

Kerry Moore Kroneman from Des Moines, IA

Marsha Szymczuk from Des Moines, IA

Maryanne Sobiech from Des Moines, IA

Megan McDowell from Des Moines, IA

Michael Farley from Des Moines, IA

Nicole Wherry from Des Moines, IA

Nina L from Des Moines, IA

Patsy Shors from Des Moines, IA

Peggy Fitch from Des Moines, IA

Rachel Rovine from Des Moines, IA

Robin Madison from Des Moines, IA

Ryan Lombard from Des Moines, IA

Susan Stroope from Des Moines, IA

Virginia Wadsley from Des Moines, IA

Wanda Wendt from Des Moines, IA

Anna Gebhardt from Des Moines, IA

Christina Brandon from Des Moines, IA

J L Trent from Des Moines, IA

Jane Freeman from Des Moines, IA

Jill Tenney from Des Moines, IA

Jon Betz from DeWitt, IA

Robin Ketchum from Dexter, IA

Antonino Erba from Dubuque, IA

Briana Moss from Dubuque, IA

Dorothy Schwendinger from Dubuque, IA

Frank Belcastro from Dubuque, IA

Julie Johnson from Dubuque, IA

Kristin Glomstad-Yoon from Dubuque, IA

Paul Francis Schultz from Dubuque, IA

Sarah Wirth from Dubuque, IA

Steven Neal from Earlham, IA

Julie Duhn from Eldora, IA

Colene Colby from Elgin, IA

Dale Steichen from Elgin, IL

Don Langstaff from Fairfield, IA

Hurd Hess from Fairfield, IA

Jerry Avise-Roue from Fairfield, IA

Melinda Arndt from Fairfield, IA

Sandra Rando from Fairfield, IA

David Matt from Fairfield, IA

David Ballou from Fairfield, IA

Karen Beine from Floyd, IA

Judith Neal from Fort Dodge, IA

Laura Elsinger from Garnavillo, IA

Dean DePree from George, IA

Amy Stickrod from Glenwood, IA

Holly Kooistra from Grimes, IA

Judy Cohen from Grimes, IA

Nancy Cadmus from Grinnell, IA

Gordie Felger from Hiawatha, IA

Joseph Driscoll from Honey Creek, IA

Jacquelene Rasmussen from Huxley, IA

Virgil Hovden from Independence, IA

Gaye Wiekierak from Indianola, IA

Margaret Vernon from Indianola, IA

Elaine Donovan from Iowa, IA

Allie Koolbeck from Iowa City, IA

Anne Fitzgerald from Iowa City, IA

Barbara Helmick from Iowa City, IA

Cari Linkenmeyer from Iowa City, IA

Carol McGhan from Iowa City, IA

Carol DeProsse from Iowa City, IA

Dan Daly from Iowa City, IA

David Leshtz from Iowa City, IA

Deb Quade from Iowa City, IA

Del Holland from Iowa City, IA

Gaylen Wobeter from Iowa City, IA

J.L. McClure from Iowa City, IA

Jane Sexton from Iowa City, IA

Jennifer Breon from Iowa City, IA

Jerry Cilek from Iowa City, IA

John Elson from Iowa City, IA

Joy Smith from Iowa City, IA

Julie Mock from Iowa City, IA

Karmen Berger from Iowa City, IA

Laura Kerr from Iowa City, IA

Loulwa Soweid from Iowa City, IA

Lynn Sidwell from Iowa City, IA

Mandi Remington from Iowa City, IA

Mary Kirkpatrick from Iowa City, IA

Mary Light from Iowa City, IA

Matthew Gordon from Iowa City, IA

Melody Smith from Iowa City, IA

Paul Muhle from Iowa City, IA

Rhonda Rowden from Iowa City, IA

Sandy Beck from Iowa City, IA

Sheri Deal-Tyne from Iowa City, IA

Sydney Landstrom from Iowa City, IA

Tony Wobeter from Iowa City, IA

Victoria Fernandez from Iowa City, IA

Wendy Keen from Iowa City, IA

Nancy Nicholson from Iowa Falls, IA

Jane Alexander from Jefferson, IA

Barbara Minear from Johnston, IA

Doug Minear from Johnston, IA

Mary Scarcello from Johnston, IA

Megan Down from Johnston, IA

Rich Gradoville from Johnston, IA

Taylor Nelson from Johnston, IA

Kathy Vitasek from Johnston, IA

James Berge from Kensett, IA

Sue Huff from Keosauqua, IA

Jo Fokken from Kingsley, IA

Lou Willis from Knoxville, IA

Gary Osland from Laurel, IA

Ken French from LeMars, IA

Mike DeCook from Lovilia, IA

Ian Souter from Manilla, IA

Gene Jackson from Marshalltown, IA

Wiltse McWilliam from Marshalltown, IA

Bettie Bolar from Marshalltown, IA

Connie Johnson from Mason City, IA

Curt Nelson from Mason City, IA

Deb Lassise from Mason City, IA

Denise Miller from Mason City, IA

Marci Turner from Mason City, IA

Mary Sue Kislingbury from Mason City, IA

Sheila Goeken from Mason City, IA

Thomas Willett from Mason City, IA

Marie DeVries from Mount Vernon, IA

Marsha Acord from Mount Vernon, IA

Allison Castle from Muscatine, IA

Belen Rodriguez from Muscatine, IA

Dave Duit from Nevada, IA

Michael Madden from New City, NY

Linda Schrader from Newton, IA

Caitlin Golle from Nora Springs, IA

Amy McBeth from North Liberty, IA

Matthew Tonelli from North Liberty, IA

Weldon Woodward from North Liberty, IA

Melinda Rankins from Norwalk, IA

Jeff Milks from Oelwein, IA

Ashlie Sveum from Osage, IA

Patricia Wickham from Osage, IA

Penney Morse from Osage, IA

Alan Farley from Perry, IA

Madison Lamb from Perry, IA

Nancy Pinkerton from Pleasant Hill, IA

Steve Monk from Polk City, IA

Jim Vorland from Preston, IA

Michael Lundy from Riverton, IA

Brian Walshire from Rowley, IA

Christopher Lish from San Rafael, CA

Frank Kloucek from Scotland, SD

Debra Hattan from Sioux City, IA

Mary Starry from Solon, IA

David Damstrom from Spencer, IA

Connie Rosenberg from St. Ansgar, IA

Berleen Wobeter from Toledo, IA

David Eash from Urbandale, IA

Ginny Swift from Urbandale, IA

Rosemary Partridge from Wall Lake, IA

Becky Edmondon from Walnut, IA

Patrick Morrissey from Waterloo, IA

Mackenzie Jones from Waukee, IA

Kathleen Snelling from Waverly, IA

Kim Folkers from Waverly, IA

Marlene Bringolf from Webster City, IA

Elizabeth Ahrens from West Branch, IA

Brett Hollenbeck from West Des Moines, IA

Dianne Kobberdahl from West Des Moines, IA

Eric Morse from West Des Moines, IA

Karsen Duve from West Des Moines, IA

Laurie Jones from West Des Moines, IA

Robert Hughes from West Des Moines, IA

Stacie Schmidt from Windsor Heights, IA

Cheri Grauer from Winterset, IA

MJ Banwart from Ames, IA

Bernard Webb from Ankeny, IA

Nyakota Ding from Urbandale, IA

Anna McGee from Denver, CO

Sarah Jedd from Des Moines, IA

Jane Freeman from Des Moines, IA

Michael Ziegenhorn from Iowa City, IA

Bear Hickman from Milwaukee, IA

Larry Fitzpatrick from Iowa City, IA

Mindy Kruckenberg from Cedar Rapids, IA

Connie Johnson from Mason City, IA

Drew Greene from Ames, IA

Allison Simpson from Bellevue, IA

Wendy Hopp from Asbury, IA

Jake Rios from Dubuque, IA

Nicholas Agan from Dubuque, IA

Kyle Belcher from Coralville, IA

Lindsay Schmitt from Dubuque, IA

Johnathan Temenak from North Liberty, IA

Caitlin Golle from Nora Springs, IA

Diane Rosenberg from Fairfield, IA

Alicia Ehlers from Dubuque, IA

Carlene Schaefer from Dubuque, IA

Sandra Helmke from North Liberty, IA

Lisa McPherson from Mount Pleasant, IA

Andrew Leonard from Cedar Rapids, IA

John M Dooley from Davenport, IA

Eric Stewart from Davenport, IA

Catherine Petersen from Davenport, IA

Andrew Petersen from Davenport, IA

Robert Hopp from Asbury, IA

Debbie Sommers-Krause from Bettendorf, IA

Linda Holvik from Marshalltown, IA

Bonnie Grimmius from Marshalltown, IA

Terri Burton-Wire from Ankeny, IA

Hurd Hess from Fairfield, IA

Marie Zibert from Des Moines, IA

Michael Powers from Coralville, IA

Nicholas Knight from Earlham, IA

Regina MacRae from Des Moines, IA

Denise Fletcher from Toledo, IA

Robert Traer from Iowa City, IA

Todd Southworth from Waterloo, IA

Mary Light from Iowa City, IA

Mike Evans from Chariton, IA

Kathleen Brown from Fairfield, IA

Jackie Smith from West Des Moines, IA

Antonino Erba from Dubuque, IA

Edward Kropa from Mount Pleasant, IA

Toby Raine from Minneapolis, MN

Amanda Gran from Des Moines, IA

Jaime Izaguirre from Dubuque, IA

Katie Bryan from Des Moines, IA

Kim Callahan from Des Moines, IA

Ava Auen-Ryan from Omaha, NE

Matthew Covington from Des Moines, IA

Edward Wollner from West Des Moines, IA

From: June Oliver
To: R7-WaterDivision
Subject: Iowa Water Polution Disgrace
Date: Thursday, December 19, 2024 11:43:48 AM

Jeffrey Robichaud
Water Division
US EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Mr. Robichaud,

I urge you to require the Iowa Department of Natural Resources to add the seven impairments the US Environmental Protection Agency identified as containing unhealthy and dangerous nitrate levels to 2024 Iowa 303(d) list of impaired waters.

Numerous water samples revealed these water segments affecting the Cedar, Des Moines, Iowa, Raccoon, and South Skunk Rivers had nitrate levels of 10 mg/L or higher. So far the Iowa DNR is resisting their inclusion. To protect the public health of all Iowans, each segment should be assigned a Category 5 impairment and require a TMDL for the following reasons:

(1) The DNR is improperly applying the 10% rule to determine nitrate impairments. This rule uses a mathematical calculation developed by the EPA to designate a water as impaired if water samples reveal pollutants 10% of the time. While the EPA supports this rule for a variety of pollutants, it does not do so for nitrate due to its established toxicity. Consuming water laden with nitrate levels of 10 mg/L or more endangers public health. It can cause methemoglobinemia, blue baby syndrome, a fatal condition in infants. Studies link consuming high nitrate levels to colorectal, kidney, ovarian, stomach and thyroid cancers as well as birth defects.

Drinking water should never exceed nitrate levels of 10 mg/L ***one hundred percent of the time***. The DNR's methodology for measuring the nitrate levels using the 10% rule is faulty and irresponsible.

(2) The DNR bases the removal or inclusion of impaired waters on the 303(d) list on annual cycles of water data monitoring. But that doesn't take into account the inconsistencies of rainfall and drought over a period of

several years. This is another flawed approach.
During drought years, rivers and streams flow less and conceal impairments. In wet years, as we saw this spring, rivers and streams that previously appeared unimpaired contain high levels of nitrate and phosphorus pollutants released by the heavy rainfall.
The DNR's approach to adding an impaired waterway identified during a wet year then removing it during a dry year if impairments don't appear present is inconsistent and problematic. It doesn't provide an accurate picture of Iowa's water quality nor does it enable watershed groups to accurately develop plans that can have a meaningful impact on mitigating polluted waterways.
The Iowa Environmental Council recommends the DNR use a 5-10 year window to evaluate impairments in waterways, a common-sense approach that would give a more accurate assessment of the presence of pollutants.
The DNR's refusal to add these seven segments to the 2024 303(d) list does a disservice to Iowans. Half of Iowa's waterways that undergo tests are impaired, and only half are tested every two years. This is an appalling state of affairs. At the very least, the Iowa DNR should add these waterbodies to the 2024 list and do a better job protecting public health.
Sincerely yours,

June Oliver
[redacted]

From:	Reagan Giesenschlag
To:	R7-WaterDivision
Cc:	Ed Thomas; Tom Lynch
Subject:	TFI Comments on the EPA Region 7 Partial Disapproval of 2024 Iowa 303(d) List
Date:	Thursday, December 19, 2024 11:49:19 AM
Attachments:	TFI Comments_EPA Region 7 Partial Disapproval of 2024 Iowa 303(d) List.pdf

Hello –

Please see the attachment for comments on behalf of The Fertilizer Institute. Please reach out if there are any questions.

Thank you,

Reagan Giesenschlag

Director, Government Affairs

The Fertilizer Institute

4201 Wilson Blvd, Suite 700

Arlington, VA 22203

[redacted]

[redacted]

December 19, 2024

Submitted via email to R7-WaterDivision@epa.gov

Jeffery Robichand
EPA Region 7
Water Division
Lenexa, KS 66219

RE: Comments on the EPA Region 7 Partial Disapproval of 2024 Iowa 303(d) List

Dear Mr. Robichand:

The Fertilizer Institute (TFI), on behalf of its member companies, submits these comments addressing the U.S. Environmental Protection Agency Region 7 (EPA-7) in response to the partial disapproval-7 of Iowa's 2024 303(d) list made on November 13, 2024.

Statement of Interest

TFI represents the nation's fertilizer industry, including producers, importers, retailers, wholesalers, and companies that are engaged in all aspects of the fertilizer supply chain. Fertilizer is a key ingredient in feeding a growing global population, which is expected to surpass 9.5 billion people by 2050. Half of all food grown around the world today is made possible through the use of fertilizer.

TFI member companies have a long history of supporting initiatives for the protection and improvement of water quality. TFI member companies have committed significant time and resources to reduce N and P loadings through our 4R Nutrient Stewardship Program, the 4R Research Fund, and state 4R Certification Programs. By fostering innovative solutions, advocating for best practices, and collaborating with stakeholders, TFI is committed to safeguarding aquatic ecosystems, ensuring sustainable water management, and enhancing the overall health of water resources for future generations.

Opening Statement

TFI recognizes the importance of protecting U.S. waters and supports voluntary approaches to water quality protection and improvement. TFI is deeply concerned with EPA-7's request for the Iowa Department of Natural Resources (DNR) to modify its assessment methodology and believes this decision goes beyond EPA-7's authority. Listing of impaired waters should be based on logical, effective scientific methods that allow states to prioritize and direct resources to watersheds with systemic issues. TFI agrees with the rationale provided by Iowa DNR in response to comments submitted by EPA-7 and supports the decisions to decline requested changes.

For the reasons outlined below, TFI opposes EPA-7's partial denial and believes major deviations to historically accepted methodology should be subject to a formal rulemaking process.

TFI Comments

TFI has reviewed comments submitted by EPA-7 to DNR and DNR's subsequent response. TFI fully supports DNR's rationale and justification for declining changes requested by EPA-7 and provides the following comments:

- EPA-7's responsibility is limited to approving or disapproving listings, not dictating assessment methodology used by the state. This partial disapproval contradicts the principles of cooperative federalism, particularly considering that this occurs after more than 20 years of successful collaboration and approaches regarding Iowa's 303(d) list.

- EPA-7 has not provided sufficient scientific or regulatory rationale to support methodology changes, claims that the 10% binomial rule is "non-defensible" for nitrates, and the addition of the proposed seven water segments.

- EPA-7 should provide greater transparency (i.e. data sources and full data sets) on additional data considered for the proposed seven segments since the data presented does not match existing and readily available data. Notably, EPA-7 fails to disclose the total number of samples taken in Table 1, which limits the ability to make substantive comments on the assessment of water segments being proposed for addition.

- EPA-7's requests are a major departure from well-established and historical policies for reviewing impaired waters list and such significant changes require a formal rulemaking process.

Conclusion

TFI appreciates EPA's consideration of these comments in response to the partial disapproval of Iowa DNRs 2024 303(d) list. We will gladly provide any additional information necessary to help further support Iowa's 2024 303(d) list to remain unchanged. Please contact me by telephone at [redacted] if you would like to discuss our comments or if we can provide any additional information.

Sincerely,

Reagan Giesenschlag
Director, Government Affairs

From:	Madsen, Tami
To:	R7-WaterDivision
Subject:	Public Comment on Iowa Impaired Waters
Date:	Thursday, December 19, 2024 8:47:48 PM
Attachments:	Outlook-fj054e0s.png CIWW public comment letter_Impaired Waters.pdf

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> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good Evening Mr. Robichaud,

Thank you for the opportunity to provide comment on the 2024 Impaired Water List. Please see my attached letter concerning the same.

With Respect,

Tami Madsen
Executive Director
Central Iowa Water Works
[redacted]

CENTRAL IOWA WATER WORKS

Temporary address:
2201 George Flagg Parkway
Des Moines, IA 50321
email: info@ciww.gov

December 19, 2024

Jeffrey Robichaud
Water Division
U.S. EPA Region 7
11201 Renner Blvd.
Lenexa, KS 66219
Email: R7-WaterDivision@epa.gov

RE: Iowa Impaired Waters List - 2024

Dear Mr. Robichaud,

Central Iowa Water Works (CIWW) is a regional water production authority founded by twelve entities representing utilities, communities, and rural providers. CIWW is responsible for drinking water treatment, water system planning, and the wholesale delivery of water across central Iowa.

On behalf of CIWW, I would like to thank the U.S. Environmental Protection Agency for your attention to Iowa's impaired waters list and for the proposed additions of two segments that serve an important role in providing clean, reliable water for the benefit of twenty percent of the state's population.

The two proposed additions to the impaired waters list that are of direct concern to the CIWW service population are:

1. Des Moines River IA 04-UDM-1211 – a 6.53-mile segment of the river, which includes Des Moines Water Work's intake at Prospect Park in Des Moines.
2. Raccoon River IA 04-RAC-1116 – a 15.59-mile segment of the river, including the entire section that runs through Des Moines Water Works Park and includes the intake at the Fleur Drive Treatment Plant in Des Moines.

Data measured by Des Moines Water Works (DMWW), our contract operator, shows concerning trends with nitrate concentrations in the segment of the Raccoon River flowing past the intake at the Fleur Drive treatment plant. This year, nitrate concentrations in the Raccoon River were among the highest they have seen, reaching a peak of 18.23 mg/L on June 24, nearly doubling the drinking water standard of 10 mg/L. In the Des Moines River, nitrate concentrations reached 15.56 mg/L on May 16, also higher than the drinking water standard.

This letter serves as Central Iowa Water Works' comment in support of the addition of Des Moines River IA 04-UDM-1211 and Raccoon River IA 04-RAC-1116 to the 2024 impaired waters list.

Thank you for the opportunity to provide remarks on this important matter.

Sincerely,

Tami Madsen
Executive Director
Email: [redacted]
Phone: [redacted]

3. Appendix B: The EPA-approved Iowa 2024 CWA Section 303(d) List

Definitions: N – Nitrogen; **Bold** – WQLSs added to list; PCBs - Polychlorinated biphenyls; and aka - Also Known As.

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
1	IA 01-MAQ-20	Backbone Lake	*Escherichia coli (E. coli)*	Primary Contact Recreation	
2	IA 04-UDM-1291	Badger Lake	Secchi Disk Transparency	Primary Contact Recreation	
3	IA 02-WFC-820	Bailey Creek	Biological Integrity	Aquatic Life	
4	IA 03-SSK-3053	Ballard Creek	Fish Kill(s)	Aquatic Life	
5	IA 06-LSR-1631	Barringer Slough	Dissolved Oxygen	Aquatic Life	
6	IA 01-TRK-215	Bass Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
7	IA 01-TRK-215	Bass Creek	Thermal Modifications	Aquatic Life	
8	IA 01-TRK-216	Bass Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	X
9	IA 01-UIA-251	Bear Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
10	IA 01-VOL-297	Bear Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
11	IA 02-CED-517	Bear Creek	Benthic Macroinvertebrates	Aquatic Life	X
12	IA 02-CED-517	Bear Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
13	IA 02-CED-523	Bear Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
14	IA 01-UIA-286	Beaver Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
15	IA 01-UIA-286	Beaver Creek	Thermal Modifications	Aquatic Life	
16	IA 02-CED-555	Beaver Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
17	IA 02-CED-557	Beaver Creek	Benthic Macroinvertebrates	Aquatic Life	
18	IA 02-CED-582	Beaver Creek	Benthic Macroinvertebrates	Aquatic Life	
19	IA 04-UDM-1233	Beaver Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
20	IA 02-WFC-818	Beeds Lake	Secchi Disk Transparency	Primary Contact Recreation	
21	IA 04-UDM-1243	Big Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
22	IA 04-UDM-6540	Big Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
23	IA 04-UDM-1242	Big Creek Lake	Chlorophyll-a	Primary Contact Recreation	
24	IA 02-ICD-602	Big Hollow Creek	Fish Kill(s)	Aquatic Life	
25	IA 02-ICD-6496	Big Hollow Lake	Chlorophyll-a	Primary Contact Recreation	X
26	IA 02-ICD-6496	Big Hollow Lake	pH	Aquatic Life, Primary Contact Recreation	
27	IA 02-ICD-6496	Big Hollow Lake	Secchi Disk Transparency	Primary Contact Recreation	
28	IA 06-BSR-1522	Big Sioux River	Fish Kill(s)	Aquatic Life	
29	IA 06-BSR-1522	Big Sioux River	Selenium	Aquatic Life	X
30	IA 06-BSR-1524	Big Sioux River	pH	Aquatic Life, Primary Contact Recreation	X
31	IA 06-BSR-1525	Big Sioux River	pH	Aquatic Life, Primary Contact Recreation	X
32	IA 02-IOW-656	Big Wall Lake	Dissolved Oxygen	Aquatic Life	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
33	IA 01-UIA-284	Bigalks Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
34	IA 01-UIA-284	Bigalks Creek	Thermal Modifications	Aquatic Life	
35	IA 02-CED-546	Black Hawk Creek	Benthic Macroinvertebrates	Aquatic Life	
36	IA 02-CED-546	Black Hawk Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
37	IA 02-CED-550	Black Hawk Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
38	IA 04-RAC-1134	Black Hawk Lake	*Escherichia coli (E. coli)*	Primary Contact Recreation	
39	IA 01-YEL-433	Bloody Run	Benthic Macroinvertebrates	Aquatic Life	X
40	IA 01-YEL-433	Bloody Run	*Escherichia coli (E. coli)*	Primary Contact Recreation	
41	IA 02-CED-518	Blue Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
42	IA 04-RAC-3105	Blue Heron Lake	Secchi Disk Transparency	Primary Contact Recreation	X
43	IA 01-TRK-221	Bohemian Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
44	IA 04-UDM-1252	Boone River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
45	IA 04-UDM-1256	Boone River	Fish Kill(s)	Aquatic Life	
46	IA 06-BOY-1502	Boyer River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
47	IA 06-BOY-1502	Boyer River	Selenium	Aquatic Life	
48	IA 04-UDM-1255	Briggs Woods Lake	Secchi Disk Transparency	Primary Contact Recreation	X
49	IA 01-TRK-217	Brockamp Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
50	IA 06-BSR-1529	Broken Kettle Creek	Biological Integrity	Aquatic Life	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
51	IA 01-WPS-358	Brophy Creek	Benthic Macroinvertebrates	Aquatic Life	
52	IA 06-WEM-1735	Browns Lake	Turbidity	Primary Contact Recreation	
53	IA 01-VOL-317	Brush Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
54	IA 01-VOL-318	Brush Creek	Benthic Macroinvertebrates	Aquatic Life	
55	IA 04-RAC-1209	Brushy Creek	Fish Kill(s)	Aquatic Life	
56	IA 04-RAC-1818	Brushy Creek	Fish Kill(s)	Aquatic Life	
57	IA 01-MAQ-45	Buck Creek	Benthic Macroinvertebrates	Aquatic Life	
58	IA 01-YEL-428	Buck Creek	Benthic Macroinvertebrates	Aquatic Life	X
59	IA 04-EDM-985	Buffalo Creek	Fish Bioassessments	Aquatic Life	
60	IA 04-EDM-986	Buffalo Creek	Fish Bioassessments	Aquatic Life	
61	IA 02-CED-580	Burr Oak Creek	Benthic Macroinvertebrates	Aquatic Life	
62	IA 02-CED-581	Burr Oak Creek	Benthic Macroinvertebrates	Aquatic Life	
63	IA 04-UDM-1826	Buttermilk Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
64	IA 02-WIN-845	Calmus Creek	Biological Integrity	Aquatic Life	
65	IA 01-NEM-6372	Candlelight Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
66	IA 01-UIA-260	Canoe Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
67	IA 06-WEM-1714	Carter Lake	Dissolved Oxygen	Primary Contact Recreation	X
68	IA 01-UIA-275	Casey Springs	*Escherichia coli (E. coli)*	Primary Contact Recreation	
69	IA 01-TRK-124	Catfish Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
70	IA 01-TRK-125	Catfish Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
71	IA 01-TRK-125	Catfish Creek	Fish Kill(s)	Aquatic Life	
72	IA 03-SKU-6549	Cedar Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
73	IA 03-SKU-905	Cedar Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
74	IA 04-LDM-1053	Cedar Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
75	IA 04-LDM-1054	Cedar Creek	Fish Bioassessments	Aquatic Life	
76	IA 02-CED-449	Cedar River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
77	IA 02-CED-451	Cedar River	Benthic Macroinvertebrates	Aquatic Life	
78	IA 02-CED-456	Cedar River	Copper	Aquatic Life	
79	IA 02-CED-462	Cedar River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
80	IA 02-CED-469	Cedar River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
81	IA 02-CED-470	Cedar River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
82	IA 02-CED-472	Cedar River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
83	IA 02-CED-477	Cedar River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
84	IA 02-CED-477	Cedar River	Mercury - Fish Consumption Advisory	Human Health	
85	IA 02-CED-478	Cedar River	Mercury - Fish Consumption Advisory	Human Health	
86	IA 02-CED-479	Cedar River	Mercury - Fish Consumption Advisory	Human Health	
87	**IA 02-CED-456**	**Cedar River**	**Nitrate plus nitrite as N**	**Drinking Water**	**X**
88	IA 06-LSR-1663	Center Lake	Secchi Disk Transparency	Primary Contact Recreation	X

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
89	IA 05-CHA-1318	Centerville Reservoir Upper	Mercury - Fish Consumption Advisory	Human Health	
90	IA 05-CHA-1313	Chariton Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
91	IA 05-CHA-1307	Chariton River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
92	IA 05-CHA-1308	Chariton River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
93	IA 05-CHA-1310	Chariton River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
94	IA 05-CHA-1310	Chariton River	Fish Bioassessments	Aquatic Life	
95	IA 05-CHA-1311	Chariton River	Biological Integrity	Aquatic Life	
96	IA 05-CHA-1311	Chariton River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
97	IA 05-CHA-1312	Chariton River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
98	IA 03-SKM-886	Chatfield Lake	Mercury - Fish Consumption Advisory	Human Health	
99	IA 01-UIA-6437	Clark Creek	Fish Kill(s)	Aquatic Life	
100	IA 01-UIA-235	Clear Creek	Benthic Macroinvertebrates	Aquatic Life	X
101	IA 01-UIA-249	Clear Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
102	IA 01-TRK-134	Cloie Branch	Benthic Macroinvertebrates	Aquatic Life	
103	IA 01-TRK-134	Cloie Branch	Temperature	Aquatic Life	
104	IA 01-MAQ-51	Coffins Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
105	IA 01-UIA-280	Coldwater Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
106	IA 01-UIA-265	Coon Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
107	IA 05-CHA-1323	Cooper Creek	Benthic Macroinvertebrates	Aquatic Life	
108	IA 02-IOW-630	Coralville Reservoir	Chlorophyll-a	Primary Contact Recreation	X
109	IA 02-IOW-630	Coralville Reservoir	*Escherichia coli (E. coli)*	Primary Contact Recreation	
110	IA 02-IOW-630	Coralville Reservoir	Turbidity	Primary Contact Recreation	
111	IA 02-ICD-605	Cottonwood Drain	Biological Integrity	Aquatic Life	
112	IA 01-VOL-303	Cox Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
113	IA 01-VOL-304	Cox Creek	Benthic Macroinvertebrates	Aquatic Life	
114	IA 01-TRK-210	Crane Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
115	IA 01-TRK-211	Crane Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
116	IA 01-TRK-212	Crane Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
117	IA 01-TRK-213	Crane Creek	Benthic Macroinvertebrates	Aquatic Life	
118	IA 06-LSR-1583	Crawford Creek Impoundment	pH	Aquatic Life, Primary Contact Recreation	X
119	IA 01-NEM-86	Crow Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
120	IA 06-LSR-1634	Dan Greene Slough	Dissolved Oxygen	Aquatic Life	
121	IA 06-LSR-1634	Dan Greene Slough	pH	Aquatic Life	
122	IA 06-FLO-1562	Deep Creek	Biological Integrity	Aquatic Life	
123	IA 02-CED-591	Deer Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
124	IA 04-LDM-1002	Des Moines River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
125	IA 04-LDM-1003	Des Moines River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
126	IA 04-LDM-1004	Des Moines River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
127	IA 04-LDM-1004	Des Moines River	Fish Kill(s)	Aquatic Life	
128	IA 04-LDM-1005	Des Moines River	Fish Kill(s)	Aquatic Life	
129	IA 04-LDM-1010	Des Moines River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
130	IA 04-LDM-1010	Des Moines River	Fish Kill(s)	Aquatic Life	
131	IA 04-UDM-1215	Des Moines River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
132	IA 04-UDM-1216	Des Moines River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
133	IA 04-UDM-1217	Des Moines River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
134	IA 04-UDM-1219	Des Moines River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
135	IA 04-UDM-1220	Des Moines River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
136	IA 04-UDM-1220	Des Moines River	Mercury - Fish Consumption Advisory	Human Health	
137	IA 04-UDM-1221	Des Moines River	Mercury - Fish Consumption Advisory	Human Health	
138	IA 04-UDM-1222	Des Moines River	Mercury - Fish Consumption Advisory	Human Health	
139	IA 04-UDM-1223	Des Moines River	Mercury - Fish Consumption Advisory	Human Health	
140	**IA 04-LDM-1011**	**Des Moines River**	**Nitrate plus nitrite as N**	**Drinking Water**	**X**
141	**IA 04-UDM-1211**	**Des Moines River**	**Nitrate plus nitrite as N**	**Drinking Water**	**X**
142	IA 06-WEM-1716	Desoto Bend	Chlorophyll-a	Primary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
143	IA 06-WEM-1716	Desoto Bend	Turbidity	Primary Contact Recreation	
144	IA 03-NSK-861	Diamond Lake	Chlorophyll-a	Aquatic Life	
145	IA 06-LSR-1672	Diamond Lake	pH	Aquatic Life	
146	IA 01-TRK-202	Dibble Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
147	IA 05-CHA-1336	Dick Creek	Biological Integrity	Aquatic Life	
148	IA 01-YEL-438	Dousman Creek	Dissolved Oxygen	Aquatic Life	
149	IA 04-UDM-6494	Drainage Ditch 97	Fish Kill(s)	Aquatic Life	
150	IA 01-TRK-2002	Dry Branch	*Escherichia coli (E. coli)*	Primary Contact Recreation	
151	IA 02-CED-507	Dry Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
152	IA 06-BSR-1878	Dry Creek	Biological Integrity	Aquatic Life	
153	IA 01-TRK-189	Dry Mill Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
154	IA 01-UIA-272	Dry Run	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
155	IA 01-UIA-272	Dry Run	Thermal Modifications	Aquatic Life	
156	IA 02-CED-554	Dry Run	Biological Integrity	Aquatic Life	
157	IA 02-CED-554	Dry Run	*Escherichia coli (E. coli)*	Primary Contact Recreation	
158	IA 02-CED-6293	Dry Run	*Escherichia coli (E. coli)*	Primary Contact Recreation	
159	IA 02-CED-2063	Dry Run (North Branch)	*Escherichia coli (E. coli)*	Primary Contact Recreation	
160	IA 02-CED-2062	Dry Run (South Branch)	*Escherichia coli (E. coli)*	Primary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
161	IA 01-UIA-6552	Dry Run Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
162	IA 01-UIA-254	Duck Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
163	IA 02-IOW-779	Eagle Lake	pH	Aquatic Life	X
164	IA 02-CED-1880	East Branch Blue Creek	Fish Kill(s)	Aquatic Life	
165	IA 02-IOW-769	East Branch Iowa River	Benthic Macroinvertebrates	Aquatic Life	
166	IA 05-NSH-1823	East Branch West Nishnabotna River	Biological Integrity	Aquatic Life	
167	IA 05-GRA-1350	East Fork Medicine Creek	Biological Integrity	Aquatic Life	
168	IA 04-LDM-1065	East Lake (Osceola)	Dissolved Oxygen	Aquatic Life	X
169	IA 05-NSH-1414	East Nishnabotna River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
170	IA 05-NSH-1415	East Nishnabotna River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
171	IA 05-NOD-1391	East Nodaway River	Biological Integrity	Aquatic Life	
172	IA 05-NOD-1391	East Nodaway River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
173	IA 05-NOD-1392	East Nodaway River	Fish Bioassessments	Aquatic Life	
174	IA 06-LSR-1652	East Okoboji Lake	Mercury	Human Health	X
175	IA 01-UIA-279	East Pine Creek	Benthic Macroinvertebrates	Aquatic Life	
176	IA 02-IOW-777	East Twin Lake	Chlorophyll-a	Aquatic Life	X
177	IA 02-IOW-777	East Twin Lake	Total Suspended Solids (TSS)	Aquatic Life	X
178	IA 02-IOW-773	Eldred Sherwood Lake	*Escherichia coli (E. coli)*	Primary Contact Recreation	
179	IA 01-TRK-175	Elk Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
180	IA 06-LSR-1629	Elk Lake	Chlorophyll-a	Aquatic Life	
181	IA 06-LSR-1629	Elk Lake	pH	Aquatic Life	
182	IA 06-LSR-1629	Elk Lake	Total Suspended Solids (TSS)	Aquatic Life	
183	IA 02-IOW-657	Elm Lake	Chlorophyll-a	Aquatic Life	
184	IA 02-IOW-657	Elm Lake	Total Suspended Solids (TSS)	Aquatic Life	
185	IA 04-LDM-1057	English Creek	Benthic Macroinvertebrates	Aquatic Life	
186	IA 02-WIN-840	Fin And Feather Lake	pH	Aquatic Life	X
187	IA 05-CHA-1341	Fivemile Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
188	IA 02-SHL-788	Flood Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
189	IA 06-FLO-1552	Floyd River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
190	IA 06-FLO-1552	Floyd River	Selenium	Aquatic Life	
191	IA 06-FLO-1553	Floyd River	Fish Bioassessments	Aquatic Life	
192	IA 06-FLO-1554	Floyd River	Biological Integrity	Aquatic Life	
193	IA 06-FLO-6266	Floyd River	Fish Kill(s)	Aquatic Life	
194	IA 04-UDM-1752	Fourmile Lake	Dissolved Oxygen	Aquatic Life	
195	IA 04-FOX-994	Fox River	Fish Bioassessments	Aquatic Life	
196	IA 04-FOX-995	Fox River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
197	IA 04-FOX-995	Fox River	Fish Bioassessments	Aquatic Life	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
198	IA 01-UIA-248	French Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
199	IA 03-SKU-896	Geode Lake	Mercury - Fish Consumption Advisory	Human Health	
200	IA 02-CED-465	George Wyth Lake	Secchi Disk Transparency	Primary Contact Recreation	
201	IA 04-LDM-6311	Grade Lake	Mercury - Fish Consumption Advisory	Human Health	
202	IA 01-TRK-127	Granger Creek	*Escherichia coli (E. coli)*	Secondary Contact Recreation	
203	IA 01-VOL-322	Grannis Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
204	IA 04-RAC-1118	Grays Lake	Chlorophyll-a	Primary Contact Recreation	X
205	IA 04-RAC-1118	Grays Lake	Secchi Disk Transparency	Primary Contact Recreation	
206	IA 05-PLA-1472	Green Valley Lake	pH	Aquatic Life, Primary Contact Recreation, Drinking Water	X
207	IA 06-LSR-1625	Gustafson Lake	*Escherichia coli (E. coli)*	Primary Contact Recreation	
208	IA 06-LSR-1625	Gustafson Lake	Secchi Disk Transparency	Primary Contact Recreation	
209	IA 04-RAC-6537	Halburn Creek	Fish Kill(s)	Aquatic Life	
210	IA 03-NSK-862	Hawthorn Lake	Chlorophyll-a	Primary Contact Recreation	
211	IA 01-YEL-447	Hecker Creek	Chloride	Aquatic Life	
212	IA 01-YEL-447	Hecker Creek	Fish Bioassessments	Aquatic Life	
213	IA 01-VOL-307	Hewett Creek	Benthic Macroinvertebrates	Aquatic Life	
214	IA 01-VOL-307	Hewett Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
215	IA 01-VOL-307	Hewett Creek	Thermal Modifications	Aquatic Life	
216	IA 01-NMQ-110	Hickory Creek	Biological Integrity	Aquatic Life	
217	IA 03-SSK-950	Hickory Grove Lake	Secchi Disk Transparency	Primary Contact Recreation	
218	IA 04-UDM-1304	High Lake	Chlorophyll-a	Aquatic Life	
219	IA 04-UDM-1304	High Lake	Total Suspended Solids (TSS)	Aquatic Life	
220	IA 02-CED-552	Holland Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
221	IA 02-CED-6491	Holland Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
222	IA 01-MAQ-53	Honey Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
223	IA 01-MAQ-6560	Honey Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
224	IA 05-CHA-1337	Honey Creek	*Escherichia coli (E. coli)*	Secondary Contact Recreation	
225	IA 05-CHA-2019	Honey Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
226	IA 01-TRK-191	Howard Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
227	IA 02-CED-504	Indian Creek	Benthic Macroinvertebrates	Aquatic Life	
228	IA 02-CED-504	Indian Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
229	IA 02-CED-505	Indian Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
230	IA 03-SSK-943	Indian Creek	Benthic Macroinvertebrates	Aquatic Life	
231	IA 03-SSK-943	Indian Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
232	IA 05-NSH-1425	Indian Creek	Biological Integrity	Aquatic Life	
233	IA 06-BSR-1531	Indian Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
234	IA 02-IOW-677	Iowa Lake	*Escherichia coli (E. coli)*	Primary Contact Recreation	
235	IA 02-IOW-677	Iowa Lake	Mercury - Fish Consumption Advisory	Human Health	
236	IA 04-BLU-969	Iowa Lake	Ammonia	Aquatic Life	X
237	IA 04-BLU-969	Iowa Lake	Chlorophyll-a	Aquatic Life	X
238	IA 04-BLU-969	Iowa Lake	pH	Aquatic Life, Drinking Water	X
239	IA 04-BLU-969	Iowa Lake	Total Suspended Solids (TSS)	Aquatic Life	X
240	IA 02-IOW-624	Iowa River	Benthic Macroinvertebrates	Aquatic Life	
241	IA 02-IOW-633	Iowa River	Mercury - Fish Consumption Advisory	Human Health	
242	IA 02-IOW-634	Iowa River	Mercury - Fish Consumption Advisory	Human Health	
243	IA 02-IOW-635	Iowa River	Mercury - Fish Consumption Advisory	Human Health	
244	IA 02-IOW-638	Iowa River	Mercury - Fish Consumption Advisory	Human Health	
245	IA 02-IOW-639	Iowa River	*Escherichia coli (E. coli)*	Primary Contact Recreation	X
246	IA 02-IOW-639	Iowa River	Mercury - Fish Consumption Advisory	Human Health	
247	IA 02-IOW-640	Iowa River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
248	IA 02-IOW-640	Iowa River	Mercury - Fish Consumption Advisory	Human Health	
249	IA 02-IOW-641	Iowa River	Mercury - Fish Consumption Advisory	Human Health	
250	IA 02-IOW-642	Iowa River	Mercury - Fish Consumption Advisory	Human Health	
251	IA 02-IOW-644	Iowa River	Mercury - Fish Consumption Advisory	Human Health	
252	IA 02-IOW-645	Iowa River	Mercury - Fish Consumption Advisory	Human Health	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
253	IA 02-IOW-646	Iowa River	Mercury - Fish Consumption Advisory	Human Health	
254	IA 02-IOW-647	Iowa River	Mercury - Fish Consumption Advisory	Human Health	
255	IA 02-IOW-648	Iowa River	Mercury - Fish Consumption Advisory	Human Health	
256	**IA 02-IOW-628**	**Iowa River**	**Nitrate as N**	**Drinking Water**	**X**
257	**IA 02-IOW-628**	**Iowa River**	**Nitrate plus nitrite as N**	**Drinking Water**	**X**
258	IA 01-UIA-247	Irish Hollow Creek	Benthic Macroinvertebrates	Aquatic Life	
259	IA 05-CHA-1332	Jackson Creek	Biological Integrity	Aquatic Life	
260	IA 05-CHA-1332	Jackson Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
261	IA 01-NMQ-105	Johns Creek	Benthic Macroinvertebrates	Aquatic Life	
262	IA 06-LSR-1605	Johns Creek	Fish Bioassessments	Aquatic Life	
263	IA 05-CHA-1330	Jordan Creek	Biological Integrity	Aquatic Life	
264	IA 05-CHA-1330	Jordan Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
265	IA 06-WED-1686	Keg Creek	Fish Bioassessments	Aquatic Life	
266	IA 06-WED-1687	Keg Creek	Biological Integrity	Aquatic Life	
267	IA 04-LDM-1080	Lake Ahquabi	Secchi Disk Transparency	Primary Contact Recreation	
268	IA 05-NSH-1435	Lake Anita	Secchi Disk Transparency	Primary Contact Recreation	X
269	IA 03-SKU-924	Lake Darling	*Escherichia coli (E. coli)*	Primary Contact Recreation	
270	IA 01-WPS-356	Lake Hendricks	Chlorophyll-a	Primary Contact Recreation	
271	IA 03-SSK-930	Lake Keomah	Mercury - Fish Consumption Advisory	Human Health	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
272	IA 06-WEM-1711	Lake Manawa	*Escherichia coli (E. coli)*	Primary Contact Recreation	X
273	IA 06-WEM-1711	Lake Manawa	Turbidity	Primary Contact Recreation	
274	IA 04-LDM-1016	Lake Miami	Mercury - Fish Consumption Advisory	Human Health	
275	IA 06-BSR-1532	Lake Pahoja	*Escherichia coli (E. coli)*	Primary Contact Recreation	
276	IA 04-LDM-1035	Lake Wapello	Mercury - Fish Consumption Advisory	Human Health	
277	IA 02-CED-524	Lime Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
278	IA 02-CED-525	Lime Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
279	IA 01-MAQ-54	Lindsey Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
280	IA 02-IOW-705	Little Bear Creek	Biological Integrity	Aquatic Life	
281	IA 02-CED-574	Little Cedar River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
282	IA 04-RAC-1176	Little Clear Lake	Dissolved Oxygen	Aquatic Life	X
283	IA 04-RAC-1176	Little Clear Lake	pH	Aquatic Life	X
284	IA 04-UDM-6542	Little Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
285	IA 01-TRK-131	Little Maquoketa River	Benthic Macroinvertebrates	Aquatic Life	
286	IA 05-GRA-1357	Little River	Fish Bioassessments	Aquatic Life	
287	IA 05-GRA-1358	Little River Watershed Lake	*Escherichia coli (E. coli)*	Primary Contact Recreation	
288	IA 05-GRA-1358	Little River Watershed Lake	Mercury - Fish Consumption Advisory	Human Health	
289	IA 06-BSR-1798	Little Rock River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
290	IA 06-BSR-1799	Little Rock River	Benthic Macroinvertebrates	Aquatic Life	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
291	IA 06-BSR-1800	Little Rock River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
292	IA 06-LSR-1564	Little Sioux River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
293	IA 06-LSR-1565	Little Sioux River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
294	IA 06-LSR-1570	Little Sioux River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
295	IA 06-LSR-1573	Little Sioux River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
296	IA 06-LSR-1577	Little Sioux River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
297	IA 06-LSR-1578	Little Sioux River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
298	IA 06-LSR-1578	Little Sioux River	Fish Bioassessments	Aquatic Life	
299	IA 06-LSR-1579	Little Sioux River	Benthic Macroinvertebrates	Aquatic Life	
300	IA 06-LSR-1659	Little Spirit Lake	Ammonia	Aquatic Life	X
301	IA 01-TRK-160	Little Turkey River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
302	IA 01-TRK-162	Little Turkey River	Benthic Macroinvertebrates	Aquatic Life	
303	IA 01-TRK-162	Little Turkey River	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
304	IA 01-TRK-163	Little Turkey River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
305	IA 01-TRK-207	Little Turkey River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
306	IA 01-TRK-208	Little Turkey River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
307	IA 01-TRK-209	Little Turkey River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
308	IA 01-VOL-328	Little Volga River	*Escherichia coli (E. coli)*	Primary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
309	IA 01-VOL-328	Little Volga River	Mercury - Fish Consumption Advisory	Human Health	
310	IA 04-UDM-1278	Lizard Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
311	IA 04-UDM-1281	Lizard Lake	pH	Aquatic Life	X
312	IA 05-GRA-1381	Loch Ayr	Secchi Disk Transparency	Primary Contact Recreation	
313	IA 03-SSK-2007	Long Dick Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
314	IA 03-SSK-960	Long Dick Creek	Benthic Macroinvertebrates	Aquatic Life	
315	IA 05-GRA-1376	Lotts Creek	Fish Bioassessments	Aquatic Life	
316	IA 02-IOW-758	Lower Pine Lake	*Escherichia coli (E. coli)*	Primary Contact Recreation	
317	IA 01-YEL-446	Ludlow Creek	Biological Integrity	Aquatic Life	
318	IA 01-TRK-123	Lux Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
319	IA 04-UDM-1260	Lyons Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
320	IA 01-NEM-81	Mad Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
321	IA 06-BOY-1505	Manteno Park Pond	Dissolved Oxygen	Aquatic Life	
322	IA 06-LSR-1581	Maple River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
323	IA 06-LSR-1581	Maple River	Selenium	Aquatic Life	
324	IA 01-MAQ-13	Maquoketa River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
325	IA 01-MAQ-14	Maquoketa River	Benthic Macroinvertebrates	Aquatic Life	
326	IA 01-MAQ-15	Maquoketa River	Benthic Macroinvertebrates	Aquatic Life	
327	IA 01-MAQ-15	Maquoketa River	*Escherichia coli (E. coli)*	Primary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
328	IA 01-MAQ-16	Maquoketa River	Benthic Macroinvertebrates	Aquatic Life	
329	IA 01-MAQ-16	Maquoketa River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
330	IA 01-MAQ-19	Maquoketa River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
331	IA 04-RAC-1160	Marrowbone Creek	Benthic Macroinvertebrates	Aquatic Life	
332	IA 04-RAC-1160	Marrowbone Creek	Dissolved Oxygen	Aquatic Life	
333	IA 05-PLA-1470	McKinley Lake	Chlorophyll-a	Primary Contact Recreation	
334	IA 05-PLA-1470	McKinley Lake	PCBS - Fish Consumption Advisory	Human Health	
335	IA 05-PLA-1470	McKinley Lake	Secchi Disk Transparency	Primary Contact Recreation	
336	IA 02-CED-508	McLoud Run	*Escherichia coli (E. coli)*	Primary Contact Recreation	
337	IA 02-CED-508	McLoud Run	Fish Kill(s)	Aquatic Life	
338	IA 04-LDM-1089	Meadow Lake	Secchi Disk Transparency	Primary Contact Recreation	
339	IA 02-CED-463	Meyers Lake	Chlorophyll-a	Primary Contact Recreation	
340	IA 01-TRK-128	Middle Fork Catfish Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
341	IA 01-TRK-6487	Middle Fork Catfish Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
342	IA 05-GRA-1378	Middle Fork Grand River	Biological Integrity	Aquatic Life	
343	IA 05-GRA-1378	Middle Fork Grand River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
344	IA 01-TRK-138	Middle Fork Little Maquoketa River	Benthic Macroinvertebrates	Aquatic Life	
345	IA 05-NOD-1400	Middle Nodaway River	Biological Integrity	Aquatic Life	
346	IA 04-LDM-1083	Middle River	Biological Integrity	Aquatic Life	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
347	IA 04-LDM-1083	Middle River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
348	IA 06-LSR-1667	Milford Creek	Benthic Macroinvertebrates	Aquatic Life	
349	IA 06-LSR-1615	Mill Creek	Biological Integrity	Aquatic Life	
350	IA 04-LDM-1045	Miller Creek	Fish Kill(s)	Aquatic Life	
351	IA 01-YEL-427	Miners Creek	Benthic Macroinvertebrates	Aquatic Life	
352	IA 01-VOL-314	Mink Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
353	IA 02-CED-6490	Minnehaha Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
354	IA 01-UIA-283	Minor Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
355	IA 01-NEM-61	Mississippi River	Fecal Coliform	Primary Contact Recreation	
356	IA 01-NEM-62	Mississippi River	Fecal Coliform	Primary Contact Recreation	
357	IA 01-NEM-62	Mississippi River	PCBS - Fish Consumption Advisory	Human Health	
358	IA 01-NEM-63	Mississippi River	Fecal Coliform	Primary Contact Recreation	
359	IA 06-WEM-1707	Missouri River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
360	IA 06-WEM-1708	Missouri River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
361	IA 06-WEM-1709	Missouri River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
362	IA 06-WEM-1715	Missouri River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
363	IA 06-WEM-1720	Missouri River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
364	IA 06-WEM-1721	Missouri River	*Escherichia coli (E. coli)*	Primary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
365	IA 06-WEM-1722	Missouri River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
366	IA 03-SSK-6508	Montgomery Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
367	IA 02-CED-513	Morgan Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
368	IA 05-NOD-1404	Mormon Trail Lake	Mercury - Fish Consumption Advisory	Human Health	
369	IA 04-LDM-1071	Morris Lake	Dissolved Oxygen	Aquatic Life	X
370	IA 02-IOW-658	Morse Lake	Chlorophyll-a	Aquatic Life	
371	IA 02-IOW-658	Morse Lake	pH	Aquatic Life	X
372	IA 02-IOW-658	Morse Lake	Total Suspended Solids (TSS)	Aquatic Life	
373	IA 02-CED-6489	Mosquito Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
374	IA 06-WED-1699	Mosquito Creek	Biological Integrity	Aquatic Life	
375	IA 06-WED-1701	Mosquito Creek	Biological Integrity	Aquatic Life	
376	IA 04-LDM-1048	Muchakinock Creek	Biological Integrity	Aquatic Life	
377	IA 04-LDM-1049	Muchakinock Creek	Fish Bioassessments	Aquatic Life	
378	IA 02-CED-519	Mud Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
379	IA 05-NSH-1457	Mud Creek	Fish Bioassessments	Aquatic Life	
380	IA 06-BSR-1546	Mud Creek	Biological Integrity	Aquatic Life	
381	IA 06-BSR-1546	Mud Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
382	IA 06-BSR-1546	Mud Creek	pH	Aquatic Life, Primary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
383	IA 05-GRA-1361	Nine Eagles Lake	Mercury - Fish Consumption Advisory	Human Health	
384	IA 05-CHA-1335	Ninemile Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
385	IA 05-CHA-1335	Ninemile Creek	Fish Bioassessments	Aquatic Life	
386	IA 05-NSH-1412	Nishnabotna River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
387	IA 05-NOD-1401	Nodaway Lake	Secchi Disk Transparency	Primary Contact Recreation	
388	IA 05-NOD-1389	Nodaway River (aka West Nodaway R.)	*Escherichia coli (E. coli)*	Primary Contact Recreation	
389	IA 04-LDM-1988	North Banner Lake	Mercury - Fish Consumption Advisory	Human Health	
390	IA 01-UIA-255	North Bear Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
391	IA 01-TRK-223	North Branch Turkey River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
392	IA 01-VOL-330	North Branch Volga River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
393	IA 01-VOL-330	North Branch Volga River	Mercury - Fish Consumption Advisory	Human Health	
394	IA 04-FAB-992	North Fabius River	Fish Bioassessments	Aquatic Life	
395	IA 02-CED-551	North Fork Black Hawk Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
396	IA 01-TRK-129	North Fork Catfish Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
397	IA 01-TRK-6486	North Fork Catfish Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
398	IA 01-NMQ-88	North Fork Maquoketa River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
399	IA 01-NMQ-88	North Fork Maquoketa River	Fish Kill(s)	Aquatic Life	
400	IA 01-NMQ-90	North Fork Maquoketa River	Benthic Macroinvertebrates	Aquatic Life	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
401	IA 01-NMQ-90	North Fork Maquoketa River	Biological Integrity	Aquatic Life	
402	IA 01-NMQ-90	North Fork Maquoketa River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
403	IA 01-YEL-2005	North Fork Yellow River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
404	IA 01-YEL-448	North Fork Yellow River	Dissolved Oxygen	Aquatic Life	
405	IA 04-RAC-1139	North Raccoon River	Benthic Macroinvertebrates	Aquatic Life	
406	IA 04-RAC-1139	North Raccoon River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
407	IA 04-LDM-1097	North River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
408	IA 04-LDM-1097	North River	Fish Bioassessments	Aquatic Life	
409	IA 03-NSK-853	North Skunk River	Chromium	Aquatic Life	
410	IA 03-NSK-853	North Skunk River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
411	IA 03-NSK-854	North Skunk River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
412	IA 03-NSK-859	North Skunk River	Biological Integrity	Aquatic Life	
413	IA 01-TRK-205	Nutting Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
414	IA 06-LSR-1638	Ocheyedan River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
415	IA 02-IOW-685	Old Mans Creek	Benthic Macroinvertebrates	Aquatic Life	
416	IA 01-TRK-198	Otter Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
417	IA 01-TRK-198	Otter Creek	Thermal Modifications	Aquatic Life	
418	IA 02-CED-514	Otter Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
419	IA 02-CED-594	Otter Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
420	IA 06-BOY-1518	Otter Creek	Benthic Macroinvertebrates	Aquatic Life	X
421	IA 02-IOW-720	Otter Creek Lake	Secchi Disk Transparency	Primary Contact Recreation	X
422	IA 01-UIA-257	Paint Creek (aka Pine Creek)	*Escherichia coli (E. coli)*	Primary Contact Recreation	
423	IA 02-SHL-790	Palmer Creek	Fish Kill(s)	Aquatic Life	
424	IA 01-UIA-259	Patterson Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
425	IA 01-TRK-168	Pecks Creek	Benthic Macroinvertebrates	Aquatic Life	
426	IA 01-TRK-168	Pecks Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
427	IA 06-BSR-1527	Perry Creek	Biological Integrity	Aquatic Life	
428	IA 02-CED-485	Pike Run	Benthic Macroinvertebrates	Aquatic Life	
429	IA 02-CED-486	Pike Run	Biological Integrity	Aquatic Life	
430	IA 01-TRK-179	Pine Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
431	IA 01-TRK-6638	Pine Creek	*Escherichia coli (E. coli)*	Secondary Contact Recreation	
432	IA 01-UIA-278	Pine Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
433	IA 06-LSR-1649	Pleasant Lake	Chlorophyll-a	Aquatic Life	
434	IA 06-LSR-1649	Pleasant Lake	pH	Aquatic Life	
435	IA 06-LSR-1649	Pleasant Lake	Total Suspended Solids (TSS)	Aquatic Life	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
436	IA 01-MAQ-46	Plum Creek	Benthic Macroinvertebrates	Aquatic Life	
437	IA 01-MAQ-46	Plum Creek	Fish Kill(s)	Aquatic Life	
438	IA 01-MAQ-47	Plum Creek	Fish Kill(s)	Aquatic Life	
439	IA 06-WED-1683	Plum Creek	Biological Integrity	Aquatic Life	
440	IA 01-TRK-165	Point Hollow Creek (aka White Pine Creek)	Benthic Macroinvertebrates	Aquatic Life	
441	IA 01-TRK-165	Point Hollow Creek (aka White Pine Creek)	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
442	IA 03-SKM-888	Pollmiller Park Lake	Mercury - Fish Consumption Advisory	Human Health	
443	IA 02-IOW-6396	Prairie Creek	Wastewater	General Use	
444	IA 03-SSK-6598	Prairie Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
445	IA 04-UDM-1796	Prairie Creek	Biological Integrity	Aquatic Life	
446	IA 04-UDM-6545	Prairie Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
447	IA 06-LSR-1647	Prairie Lake	pH	Aquatic Life	
448	**IA 04-RAC-1116**	**Raccoon River**	**Nitrate plus nitrite as N**	**Drinking Water**	**X**
449	IA 02-IOW-1899	Ralston Creek	Hydrocarbons - Priority Organics	General Use	
450	IA 04-LDM-1073	Red Haw Lake	Mercury - Fish Consumption Advisory	Human Health	
451	IA 04-LDM-1017	Red Rock Reservoir	*Escherichia coli (E. coli)*	Primary Contact Recreation	
452	IA 04-LDM-1017	Red Rock Reservoir	Turbidity	Primary Contact Recreation	
453	IA 02-IOW-6412	Rhine Creek	Fish Kill(s)	Aquatic Life	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
454	IA 02-WIN-832	Rice Lake	Chlorophyll-a	Aquatic Life	X
455	IA 02-WIN-832	Rice Lake	pH	Aquatic Life, Primary Contact Recreation	
456	IA 01-TRK-186	Roberts Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
457	IA 01-TRK-188	Roberts Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
458	IA 04-LDM-1019	Roberts Creek Lake	Turbidity	Primary Contact Recreation	
459	IA 01-NEM-6373	Robin Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
460	IA 01-MAQ-2	Rock Creek	Dissolved Oxygen	Aquatic Life	
461	IA 02-CED-3026	Rock Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
462	IA 02-CED-585	Rock Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
463	IA 02-CED-586	Rock Creek	Benthic Macroinvertebrates	Aquatic Life	X
464	IA 02-CED-586	Rock Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
465	IA 02-CED-587	Rock Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
466	IA 02-CED-588	Rock Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
467	IA 06-BSR-1534	Rock River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
468	IA 06-BSR-1537	Rock River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
469	IA 06-BSR-1538	Rock River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
470	IA 06-BSR-1538	Rock River	pH	Aquatic Life, Primary Contact Recreation	
471	IA 02-CED-526	Rodgers Park Lake	Chlorophyll-a	Primary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
472	IA 02-IOW-6403	Roff Creek	Wastewater	General Use	
473	IA 01-TRK-218	Rogers Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
474	IA 01-MAQ-6561	Routherford Branch	*Escherichia coli (E. coli)*	Primary Contact Recreation	
475	IA 05-PLA-2064	Sands Timber Lake (aka Blockton Reservoir)	Turbidity	Aquatic Life	
476	IA 03-SKU-902	Saunders Branch	Ammonia	Aquatic Life	
477	IA 03-SKU-902	Saunders Branch	Coal Tar	Aquatic Life	
478	IA 03-SKU-902	Saunders Branch	Dissolved Oxygen	Aquatic Life	
479	IA 04-UDM-1213	Saylorville Reservoir	Chlorophyll-a	Primary Contact Recreation	X
480	IA 04-UDM-1213	Saylorville Reservoir	Secchi Disk Transparency	Primary Contact Recreation	
481	IA 02-SHL-782	Shell Rock River	Mercury - Fish Consumption Advisory	Human Health	
482	IA 02-SHL-783	Shell Rock River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
483	IA 02-SHL-783	Shell Rock River	Mercury - Fish Consumption Advisory	Human Health	
484	IA 02-SHL-784	Shell Rock River	Mercury - Fish Consumption Advisory	Human Health	
485	IA 02-SHL-787	Shell Rock River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
486	IA 01-MAQ-1	Shrickers Slough	Chlorophyll-a	Aquatic Life	
487	IA 01-MAQ-1	Shrickers Slough	Secchi Disk Transparency	Aquatic Life	
488	IA 01-UIA-6596	Siewers Spring	*Escherichia coli (E. coli)*	Primary Contact Recreation	
489	IA 01-MAQ-44	Silver Creek	Benthic Macroinvertebrates	Aquatic Life	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
490	IA 01-TRK-192	Silver Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
491	IA 01-TRK-2057	Silver Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
492	IA 01-UIA-250	Silver Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
493	IA 01-UIA-282	Silver Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
494	IA 05-NSH-1454	Silver Creek	Fish Bioassessments	Aquatic Life	
495	IA 02-SHL-796	Silver Lake	pH	Aquatic Life, Primary Contact Recreation	
496	IA 06-BSR-1533	Sixmile Creek	Biological Integrity	Aquatic Life	
497	IA 06-BSR-1533	Sixmile Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
498	IA 04-UDM-1250	Skillet Creek	Biological Integrity	Aquatic Life	
499	IA 03-SKU-889	Skunk River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
500	IA 02-CED-6565	Slough Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
501	IA 06-WEM-1734	Snyder Bend Lake	Chlorophyll-a	Primary Contact Recreation	
502	IA 06-WEM-1734	Snyder Bend Lake	Turbidity	Primary Contact Recreation	
503	IA 04-LDM-1033	Soap Creek	Fish Bioassessments	Aquatic Life	
504	IA 06-SOL-1673	Soldier River	Benthic Macroinvertebrates	Aquatic Life	
505	IA 06-SOL-1673	Soldier River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
506	IA 06-SOL-1673	Soldier River	Selenium	Aquatic Life	
507	IA 04-LDM-1085	South Banner Lake	Mercury - Fish Consumption Advisory	Human Health	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
508	IA 01-UIA-252	South Bear Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
509	IA 03-SKU-6271	South Big Creek	Fish Kill(s)	Aquatic Life	
510	IA 01-TRK-171	South Cedar Creek (aka Cedar Creek)	*Escherichia coli (E. coli)*	Primary Contact Recreation	
511	IA 01-TRK-130	South Fork Catfish Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
512	IA 05-CHA-1327	South Fork Chariton River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
513	IA 05-CHA-1327	South Fork Chariton River	Fish Bioassessments	Aquatic Life	
514	IA 05-CHA-1328	South Fork Chariton River	Biological Integrity	Aquatic Life	
515	IA 05-CHA-1328	South Fork Chariton River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
516	IA 02-IOW-748	South Fork Iowa River	Benthic Macroinvertebrates	Aquatic Life	
517	IA 02-IOW-748	South Fork Iowa River	Dissolved Oxygen	Aquatic Life	
518	IA 02-IOW-751	South Fork Iowa River	Benthic Macroinvertebrates	Aquatic Life	
519	IA 02-IOW-752	South Fork Iowa River	Benthic Macroinvertebrates	Aquatic Life	
520	IA 02-IOW-752	South Fork Iowa River	Dissolved Oxygen	Aquatic Life	X
521	IA 04-RAC-1181	South Raccoon River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
522	IA 04-LDM-1074	South River	Benthic Macroinvertebrates	Aquatic Life	
523	IA 04-LDM-1074	South River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
524	IA 03-SSK-926	South Skunk River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
525	IA 03-SSK-927	South Skunk River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
526	IA 03-SSK-931	South Skunk River	*Escherichia coli (E. coli)*	Primary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
527	IA 03-SSK-934	South Skunk River	Biological Integrity	Aquatic Life	
528	IA 03-SSK-934	South Skunk River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
529	IA 03-SSK-935	South Skunk River	Benthic Macroinvertebrates	Aquatic Life	
530	**IA 03-SSK-927**	**South Skunk River**	**Nitrate plus nitrite as N**	**Drinking Water**	**X**
531	IA 04-RAC-1168	South Twin Lake	Chlorophyll-a	Aquatic Life	
532	IA 04-RAC-1168	South Twin Lake	Turbidity	Aquatic Life	
533	IA 01-NEM-87	Spencer Creek	Fish Kill(s)	Aquatic Life	
534	IA 02-CED-589	Spring Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
535	IA 02-CED-6566	Spring Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
536	IA 06-LSR-1569	Spring Lake	Secchi Disk Transparency	Primary Contact Recreation	X
537	IA 01-UIA-288	Staff Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
538	IA 01-NEM-6370	Stafford Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
539	IA 01-TRK-178	Steeles Branch	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
540	IA 01-TRK-6568	Steeles Branch	*Escherichia coli (E. coli)*	Primary Contact Recreation	
541	IA 06-LSR-1644	Stony Creek	Biological Integrity	Aquatic Life	
542	IA 04-RAC-1143	Storm Lake	*Escherichia coli (E. coli)*	Primary Contact Recreation	
543	IA 02-CED-489	Sugar Creek	Benthic Macroinvertebrates	Aquatic Life	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
544	IA 04-RAC-1174	Sunken Grove Lake	pH	Aquatic Life	X
545	IA 01-YEL-439	Suttle Creek	Benthic Macroinvertebrates	Aquatic Life	
546	IA 01-YEL-439	Suttle Creek	Dissolved Oxygen	Aquatic Life	
547	IA 04-UDM-1232	Swan Lake	Chlorophyll-a	Aquatic Life	
548	IA 04-UDM-1232	Swan Lake	pH	Aquatic Life	
549	IA 04-UDM-1232	Swan Lake	Sedimentation/Siltation	Aquatic Life	
550	IA 01-UIA-274	Ten Mile Creek	Benthic Macroinvertebrates	Aquatic Life	
551	IA 01-UIA-274	Ten Mile Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
552	IA 01-TRK-121	Tetes Des Morts Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
553	IA 01-TRK-122	Tetes Des Morts Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
554	IA 05-GRA-1351	Thompson River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
555	IA 05-NSH-1436	Troublesome Creek	Fish Bioassessments	Aquatic Life	
556	IA 01-UIA-269	Trout Creek (aka Trout Run)	Benthic Macroinvertebrates	Aquatic Life	
557	IA 01-UIA-269	Trout Creek (aka Trout Run)	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
558	IA 01-UIA-266	Trout River	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
559	IA 04-UDM-6543	Turkey Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
560	IA 01-TRK-148	Turkey River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
561	IA 01-TRK-148	Turkey River	Mercury - Fish Consumption Advisory	Human Health	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
562	IA 01-TRK-149	Turkey River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
563	IA 01-TRK-152	Turkey River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
564	IA 01-TRK-153	Turkey River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
565	IA 01-TRK-154	Turkey River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
566	IA 01-TRK-156	Turkey River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
567	IA 02-CED-590	Turtle Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
568	IA 05-GRA-1367	Twelve Mile Creek Lake	Chlorophyll-a	Primary Contact Recreation	X
569	IA 05-GRA-1367	Twelve Mile Creek Lake	Secchi Disk Transparency	Primary Contact Recreation	
570	IA 04-UDM-1231	Twelve-mile Lake	Chlorophyll-a	Aquatic Life	
571	IA 04-UDM-1231	Twelve-mile Lake	Total Suspended Solids (TSS)	Aquatic Life	
572	IA 01-UIA-273	Twin Springs Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
573	IA 01-VOL-325	Unnamed Creek (aka Volga Lake Outlet)	*Escherichia coli (E. coli)*	Primary Contact Recreation	
574	IA 04-LDM-1046	Unnamed Creek (near Eddyville)	Fish Kill(s)	Aquatic Life	
575	IA 01-WPS-394	Unnamed Creek (near Hazleton)	Fish Kill(s)	Aquatic Life	
576	IA 01-TRK-1885	Unnamed Tributary to Bass Creek	Fish Kill(s)	Aquatic Life	
577	IA 04-UDM-6541	Unnamed Tributary to Big Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
578	IA 04-UDM-6544	Unnamed Tributary to Big Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
579	IA 03-SKU-6410	Unnamed tributary to Brush Creek	Wastewater	General Use	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
580	IA 01-TRK-6408	Unnamed tributary to Catfish Creek	Wastewater	General Use	
581	IA 03-SKU-6573	Unnamed Tributary to Cedar Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
582	IA 03-SKU-6581	Unnamed Tributary to Cedar Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
583	IA 03-SKU-6585	Unnamed Tributary to Cedar Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
584	IA 02-CED-6594	Unnamed Tributary to Cedar River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
585	IA 02-CED-6294	Unnamed Tributary to Dry Run	*Escherichia coli (E. coli)*	Primary Contact Recreation	
586	IA 01-UIA-6557	Unnamed Tributary to Dry Run Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
587	IA 01-UIA-6558	Unnamed Tributary to Dry Run Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
588	IA 01-UIA-6600	Unnamed Tributary to Dry Run Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
589	IA 03-SSK-6599	Unnamed Tributary to Ioway Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
590	IA 03-SKU-6591	Unnamed Tributary to Lake Geode	*Escherichia coli (E. coli)*	Primary Contact Recreation	
591	IA 01-WPS-6457	Unnamed Tributary to Lake Hendricks	*Escherichia coli (E. coli)*	Primary Contact Recreation	
592	IA 02-CED-6432	Unnamed Tributary to Lime Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
593	IA 01-TRK-6612	Unnamed Tributary to Little Maquoketa River	Fish Kill(s)	Aquatic Life	
594	IA 06-BSR-1934	Unnamed Tributary to Little Rock River	Fish Kill(s)	Aquatic Life	
595	IA 06-LSR-6342	Unnamed Tributary to Little Sioux River	Fish Kill(s)	Aquatic Life	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
596	IA 01-MAQ-1963	Unnamed Tributary to Maquoketa River	Fish Kill(s)	Aquatic Life	
597	IA 04-RAC-2036	Unnamed Tributary to Marrowbone Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
598	IA 02-IOW-6588	Unnamed Tributary to Muddy Creek	Dissolved Oxygen	Aquatic Life	
599	IA 01-YEL-3066	Unnamed Tributary to North Fork Yellow River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
600	IA 01-TRK-6620	Unnamed Tributary to Otter Creek	Fish Kill(s)	Aquatic Life	
601	IA 02-IOW-3063	Unnamed Tributary to Price Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
602	IA 02-IOW-3064	Unnamed Tributary to Price Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
603	IA 02-IOW-6300	Unnamed Tributary to Ralston Creek	Fish Kill(s)	Aquatic Life	
604	IA 05-CHA-1915	Unnamed Tributary to Rathbun Reservoir	Fish Kill(s)	Aquatic Life	
605	IA 02-CED-3027	Unnamed Tributary to Rock Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
606	IA 01-UIA-6569	Unnamed Tributary to Silver Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
607	IA 02-IOW-6401	Unnamed tributary to Snyder Creek	Wastewater	General Use	
608	IA 02-CED-6567	Unnamed Tributary to Spring Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
609	IA 01-TRK-6580	Unnamed Tributary to Tetes Des Morts Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
610	IA 01-TRK-6589	Unnamed Tributary to Tetes Des Morts Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
611	IA 01-TRK-6460	Unnamed Tributary to Turkey River	*Escherichia coli (E. coli)*	Secondary Contact Recreation	
612	IA 01-UIA-6554	Unnamed Tributary to Unnamed Tributary to Dry Run Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
613	IA 01-UIA-6555	Unnamed Tributary to Unnamed Tributary to Dry Run Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
614	IA 01-UIA-6556	Unnamed Tributary to Unnamed Tributary to Dry Run Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
615	IA 01-YEL-6575	Unnamed Tributary to Unnamed Tributary to Yellow River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
616	IA 01-UIA-6597	Unnamed Tributary to Upper Iowa River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
617	IA 01-TRK-2058	Unnamed Tributary to UT to Silver Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
618	IA 01-UIA-6570	Unnamed Tributary to Waterloo Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
619	IA 02-CED-6262	Unnamed Tributary to West Branch Wapsinonoc Creek (aka Hoover Creek)	*Escherichia coli (E. coli)*	Primary Contact Recreation	
620	IA 02-WFC-2075	Unnamed Tributary to West Fork Cedar River	Fish Kill(s)	Aquatic Life	
621	IA 01-YEL-2059	Unnamed Tributary to Yellow River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
622	IA 01-YEL-6574	Unnamed Tributary to Yellow River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
623	IA 01-YEL-6582	Unnamed Tributary to Yellow River	*Escherichia coli (E. coli)*	Primary Contact Recreation	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
624	IA 01-UIA-236	Upper Iowa River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
625	IA 01-UIA-236	Upper Iowa River	Mercury - Fish Consumption Advisory	Human Health	
626	IA 01-UIA-237	Upper Iowa River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
627	IA 01-UIA-237	Upper Iowa River	Mercury - Fish Consumption Advisory	Human Health	
628	IA 01-UIA-238	Upper Iowa River	Mercury - Fish Consumption Advisory	Human Health	
629	IA 01-UIA-239	Upper Iowa River	Benthic Macroinvertebrates	Aquatic Life	
630	IA 01-UIA-239	Upper Iowa River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
631	IA 01-UIA-239	Upper Iowa River	Mercury - Fish Consumption Advisory	Human Health	
632	IA 01-UIA-240	Upper Iowa River	Mercury - Fish Consumption Advisory	Human Health	
633	IA 01-UIA-241	Upper Iowa River	Benthic Macroinvertebrates	Aquatic Life	
634	IA 01-UIA-241	Upper Iowa River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
635	IA 01-UIA-241	Upper Iowa River	Mercury - Fish Consumption Advisory	Human Health	
636	IA 01-UIA-242	Upper Iowa River	Mercury - Fish Consumption Advisory	Human Health	
637	IA 01-UIA-243	Upper Iowa River	Mercury - Fish Consumption Advisory	Human Health	
638	IA 01-UIA-244	Upper Iowa River	Mercury - Fish Consumption Advisory	Human Health	
639	IA 01-UIA-245	Upper Iowa River	Mercury - Fish Consumption Advisory	Human Health	
640	IA 01-VOL-291	Volga River	Mercury - Fish Consumption Advisory	Human Health	
641	IA 01-VOL-294	Volga River	Mercury - Fish Consumption Advisory	Human Health	
642	IA 01-VOL-295	Volga River	Mercury - Fish Consumption Advisory	Human Health	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
643	IA 01-VOL-296	Volga River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
644	IA 05-CHA-1329	Walker Branch	*Escherichia coli (E. coli)*	Primary Contact Recreation	
645	IA 01-WPS-372	Walnut Creek	Fish Kill(s)	Aquatic Life	
646	IA 02-IOW-708	Walnut Creek	Benthic Macroinvertebrates	Aquatic Life	
647	IA 02-IOW-709	Walnut Creek	Fish Bioassessments	Aquatic Life	
648	IA 03-SSK-953	Walnut Creek	Fish Bioassessments	Aquatic Life	
649	IA 04-RAC-1120	Walnut Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
650	IA 01-WPS-332	Wapsipinicon River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
651	IA 01-WPS-333	Wapsipinicon River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
652	IA 01-WPS-335	Wapsipinicon River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
653	IA 01-WPS-336	Wapsipinicon River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
654	IA 01-WPS-340	Wapsipinicon River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
655	IA 01-WPS-342	Wapsipinicon River	Mercury - Fish Consumption Advisory	Human Health	
656	IA 01-WPS-343	Wapsipinicon River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
657	IA 01-WPS-343	Wapsipinicon River	Mercury - Fish Consumption Advisory	Human Health	
658	IA 01-WPS-354	Wapsipinicon River	Biological Integrity	Aquatic Life	
659	IA 01-WPS-354	Wapsipinicon River	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
660	IA 01-WPS-354	Wapsipinicon River	Fish Kill(s)	Aquatic Life	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
661	IA 01-WPS-6416	Wapsipinicon River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
662	IA 01-UIA-253	Waterloo Creek	Benthic Macroinvertebrates	Aquatic Life	
663	IA 01-UIA-253	Waterloo Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation, Secondary Contact Recreation	
664	IA 06-LSR-1620	Waterman Creek	Benthic Macroinvertebrates	Aquatic Life	X
665	IA 06-LSR-1620	Waterman Creek	Dissolved Oxygen	Aquatic Life	X
666	IA 05-GRA-1356	Weldon River	Biological Integrity	Aquatic Life	
667	IA 04-RAC-1151	West Branch Buttrick Creek	Benthic Macroinvertebrates	Aquatic Life	
668	IA 06-FLO-1558	West Branch Floyd River	Fish Bioassessments	Aquatic Life	
669	IA 05-PLA-1480	West Branch One Hundred And Two River	Biological Integrity	Aquatic Life	
670	IA 02-CED-6264	West Branch Wapsinonoc	*Escherichia coli (E. coli)*	Primary Contact Recreation	
671	IA 02-WFC-801	West Fork Cedar River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
672	IA 06-LSR-1598	West Fork Little Sioux River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
673	IA 06-LSR-1598	West Fork Little Sioux River	Selenium	Aquatic Life	
674	IA 06-LSR-1599	West Fork Little Sioux River	Biological Integrity	Aquatic Life	
675	IA 05-CHA-1333	West Jackson Creek	Benthic Macroinvertebrates	Aquatic Life	
676	IA 04-LDM-1082	West Lake (Osceola)	Dissolved Oxygen	Aquatic Life	X
677	IA 05-NSH-1441	West Nishnabotna River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
678	IA 05-NSH-1446	West Nishnabotna River	Biological Integrity	Aquatic Life	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
679	IA 05-NSH-1447	West Nishnabotna River	Fish Kill(s)	Aquatic Life	
680	IA 06-LSR-2066	West Okoboji Lake - Emersons Bay	*Escherichia coli (E. coli)*	Primary Contact Recreation	
681	IA 04-UDM-1270	West Otter Creek	Fish Kill(s)	Aquatic Life	
682	IA 04-UDM-1754	West Swan Lake	Chlorophyll-a	Aquatic Life	
683	IA 04-UDM-1754	West Swan Lake	Total Suspended Solids (TSS)	Aquatic Life	
684	IA 05-TAR-1497	West Tarkio Creek	Biological Integrity	Aquatic Life	
685	IA 02-IOW-778	West Twin Lake	Chlorophyll-a	Aquatic Life	
686	IA 02-IOW-778	West Twin Lake	pH	Aquatic Life	
687	IA 02-IOW-778	West Twin Lake	Total Suspended Solids (TSS)	Aquatic Life	
688	IA 04-LDM-1059	White Breast Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
689	IA 04-LDM-1825	White Breast Creek	Biological Integrity	Aquatic Life	
690	IA 03-SSK-929	White Oak Conservation Area Lake	Chlorophyll-a	Primary Contact Recreation	X
691	IA 03-SSK-929	White Oak Conservation Area Lake	Secchi Disk Transparency	Primary Contact Recreation	
692	IA 01-NMQ-103	Whitewater Creek	Benthic Macroinvertebrates	Aquatic Life	
693	IA 01-NMQ-103	Whitewater Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
694	IA 02-CED-6593	Willow Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
695	IA 06-FLO-1829	Willow Creek	Fish Kill(s)	Aquatic Life	
696	IA 06-LSR-1611	Willow Creek	Benthic Macroinvertebrates	Aquatic Life	
697	IA 06-LSR-1626	Willow Creek	Benthic Macroinvertebrates	Aquatic Life	

Number	Water Body ID	Water Body Name	Impairment Cause	Impaired Use	New Listing
698	IA 06-LSR-1626	Willow Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
699	IA 06-LSR-6299	Willow Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
700	IA 05-PLA-1477	Wilson Park Lake	Secchi Disk Transparency	Primary Contact Recreation	
701	IA 02-WIN-826	Winnebago River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
702	IA 02-WIN-827	Winnebago River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
703	IA 02-WIN-831	Winnebago River	Biological Integrity	Aquatic Life	
704	IA 02-CED-530	Wolf Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
705	IA 05-CHA-1339	Wolf Creek	Biological Integrity	Aquatic Life	
706	IA 05-CHA-1339	Wolf Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
707	IA 01-TRK-219	Wonder Creek	*Escherichia coli (E. coli)*	Primary Contact Recreation	
708	IA 01-YEL-2060	Yellow River	*Escherichia coli (E. coli)*	Primary Contact Recreation	
709	IA 01-YEL-435	Yellow River	Fish Bioassessments	Aquatic Life	
710	IA 01-YEL-436	Yellow River	Fish Kill(s)	Aquatic Life	
711	IA 01-YEL-437	Yellow River	Fish Bioassessments	Aquatic Life	
712	IA 06-BOY-1514	Yellow Smoke Park Lake	Mercury - Fish Consumption Advisory	Human Health	

4. Appendix C: Data Exceedances

Iowa DNR Site Number	Data Source	Location Name	Sample Date	Parameter	Result (mg/L)
05464420	U.S. Geological Survey	Cedar River at Blairs Ferry Road at Palo, IA	06/15/2022	Nitrate + Nitrite (as N)	10.3
05464420	U.S. Geological Survey	Cedar River at Blairs Ferry Road at Palo, IA	07/12/2022	Nitrate + Nitrite (as N)	10.1
99990021	Cedar Rapids Water Works	Cedar River	06/21/2022	Nitrate as N	13.66
99990021	Cedar Rapids Water Works	Cedar River	06/21/2022	Nitrite as N	0.045
99990021	Cedar Rapids Water Works	Cedar River	06/28/2022	Nitrate as N	11
99990021	Cedar Rapids Water Works	Cedar River	06/28/2022	Nitrite as N	0.043
2222222	U.S. Army Corp of Engineers	Iowa River (Downstream Coralville Reservoir)	05/16/2022	Nitrate + Nitrite (as N)	10.5
2222222	U.S. Army Corp of Engineers	Iowa River (Downstream Coralville Reservoir)	06/06/2022	Nitrate + Nitrite (as N)	11.9
2222222	U.S. Army Corp of Engineers	Iowa River (Downstream Coralville Reservoir)	06/21/2022	Nitrate + Nitrite (as N)	10.8
99990175	Public Water Supply	Iowa River	05/11/2022	Nitrate as N	11.2
99990175	Public Water Supply	Iowa River	05/12/2022	Nitrate as N	11
99990175	Public Water Supply	Iowa River	06/05/2022	Nitrate as N	10.4
99990175	Public Water Supply	Iowa River	06/07/2022	Nitrate as N	11.6
99990175	Public Water Supply	Iowa River	06/08/2022	Nitrate as N	11
99990175	Public Water Supply	Iowa River	06/22/2022	Nitrate as N	10.6
99990175	Public Water Supply	Iowa River	06/23/2022	Nitrate as N	13
99990175	Public Water Supply	Iowa River	06/24/2022	Nitrate as N	13.8
99990175	Public Water Supply	Iowa River	06/25/2022	Nitrate as N	13
99990175	Public Water Supply	Iowa River	06/27/2022	Nitrate as N	12
99990175	Public Water Supply	Iowa River	06/28/2022	Nitrate as N	11
99990176	Public Water Supply	Iowa River	05/12/2022	Nitrate as N	11.4
99990176	Public Water Supply	Iowa River	06/08/2022	Nitrate as N	11.2
99990176	Public Water Supply	Iowa River	06/15/2022	Nitrate as N	11
99990176	Public Water Supply	Iowa River	06/22/2022	Nitrate as N	12
99990176	Public Water Supply	Iowa River	07/06/2022	Nitrate as N	10.2
10620001	Iowa Department of Natural Resources	South Skunk River near Oskaloosa	11/02/2021	Nitrate + Nitrite (as N)	11
10620001	Iowa Department of Natural Resources	South Skunk River near Oskaloosa	06/01/2022	Nitrate + Nitrite (as N)	13
10900003	Iowa Department of Natural Resources	Des Moines River Upstream of Ottumwa (US1)	06/04/2013	Nitrate + Nitrite (as N)	13

Iowa DNR Site Number	Data Source	Location Name	Sample Date	Parameter	Result (mg/L)
10900003	Iowa Department of Natural Resources	Des Moines River Upstream of Ottumwa (US1)	07/01/2013	Nitrate + Nitrite (as N)	14
99990003	Des Moines Water Works	Raccoon River	04/26/2022	Nitrate as N	10.13
99990003	Des Moines Water Works	Raccoon River	04/26/2022	Nitrite as N	0.05
99990003	Des Moines Water Works	Raccoon River	05/10/2022	Nitrate as N	11.16
99990003	Des Moines Water Works	Raccoon River	05/10/2022	Nitrite as N	0.05
99990003	Des Moines Water Works	Raccoon River	05/27/2022	Nitrate as N	10.68
99990003	Des Moines Water Works	Raccoon River	05/27/2022	Nitrite as N	0.05
99990003	Des Moines Water Works	Raccoon River	06/08/2022	Nitrate as N	11.95
99990003	Des Moines Water Works	Raccoon River	06/08/2022	Nitrite as N	0.06
99990003	Des Moines Water Works	Raccoon River	06/09/2022	Nitrate as N	13.78
99990003	Des Moines Water Works	Raccoon River	06/09/2022	Nitrite as N	0.05
99990003	Des Moines Water Works	Raccoon River	06/10/2022	Nitrate as N	14.06
99990003	Des Moines Water Works	Raccoon River	06/10/2022	Nitrite as N	0.05
99990003	Des Moines Water Works	Raccoon River	06/16/2022	Nitrate as N	11.77
99990003	Des Moines Water Works	Raccoon River	06/16/2022	Nitrite as N	0.05
99990003	Des Moines Water Works	Raccoon River	06/17/2022	Nitrate as N	12.33
99990003	Des Moines Water Works	Raccoon River	06/17/2022	Nitrite as N	0.05
99990015	Des Moines Water Works	Des Moines River	05/09/2022	Nitrate as N	10.95
99990015	Des Moines Water Works	Des Moines River	05/09/2022	Nitrite as N	0.05
99990015	Des Moines Water Works	Des Moines River	05/10/2022	Nitrate as N	10.84
99990015	Des Moines Water Works	Des Moines River	05/10/2022	Nitrite as N	0.05
99990015	Des Moines Water Works	Des Moines River	05/13/2022	Nitrate as N	10.59
99990015	Des Moines Water Works	Des Moines River	05/13/2022	Nitrite as N	0.06
99990015	Des Moines Water Works	Des Moines River	06/20/2022	Nitrate as N	10.78
99990015	Des Moines Water Works	Des Moines River	06/20/2022	Nitrite as N	0.07
99990015	Des Moines Water Works	Des Moines River	06/21/2022	Nitrate as N	11.31
99990015	Des Moines Water Works	Des Moines River	06/21/2022	Nitrite as N	0.05
99990015	Des Moines Water Works	Des Moines River	06/22/2022	Nitrate as N	10.86
99990015	Des Moines Water Works	Des Moines River	06/22/2022	Nitrite as N	0.06
99990015	Des Moines Water Works	Des Moines River	06/24/2022	Nitrate as N	10.25
99990015	Des Moines Water Works	Des Moines River	06/24/2022	Nitrite as N	0.06
99990015	Des Moines Water Works	Des Moines River	06/27/2022	Nitrate as N	10.11
99990015	Des Moines Water Works	Des Moines River	06/27/2022	Nitrite as N	0.1