

**PUBLIC PARTICIPATION RESPONSIVENESS SUMMARY
FOR IOWA'S 2026
CLEAN WATER ACT SECTION 303(d) LIST**

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

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2026 Integrated Report Responsiveness Summary

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Introduction

The following constitutes a summary of the Iowa Department of Natural Resources' (DNR) responses to the comments received concerning the draft 2026 Clean Water Act (CWA) Section 303(d) list developed by the DNR. The notice of availability for the draft 2026 list was issued for public review and comment on February 17, 2026, via the DNR EcoNewsWire

(<https://content.govdelivery.com/accounts/IACIO/bulletins/40a3921>). Supplemental materials pertaining to the draft 2026 list were accessible on the DNR's assessment website

(<https://programs.iowadnr.gov/adbnnet/Assessments/Summary/2026>). The period for accepting public comments extended from February 17, 2026, through March 19, 2026. As distributed for public comment, the DNR's draft 2026 Section 303(d) list enumerated 574 water segments with a total of 751 impairments.

This responsiveness summary offers a discussion of the issues presented in the comments received and details how these comments were integrated into the formulation of the DNR's final 2026 Integrated Report (IR) and Section 303(d) List (<https://programs.iowadnr.gov/adbnnet/Assessments/Summary/2026>).

More than 200 distinct comment letters and emails were submitted during the public comment period for the Integrated Report. For this responsiveness summary, the comments have been organized into similar thematic categories and subsequently addressed. A comprehensive list of all commenters and their specific input is provided in Appendices A and B.

Revisions Implemented in Iowa's Draft 2026 Integrated Report (IR)

There were revisions made to five draft assessments following the public comment period. Based on information discovered following the public comment period, and during the ATTAINS upload QA, the five final assessments were revised according to IR methodology (Table 1).

Table 1. Revisions made to the DNR's draft 2026 IR.

ADBNet Code	Waterbody Name	Designated Use	Draft IR Category	Final IR Category	Rationale
IA 04-EDM-971	East Fork Des Moines River	A1	4a	5a	Bacteria impairment - Not covered by TMDL
IA 04-EDM-1882	East Fork Des Moines River	A2	4a	5a	Bacteria impairment - Not covered by TMDL
IA 05-CHA-1331	Corydon Reservoir	BLW	4a	5a	Organic Enrichment: Low Dissolved Oxygen - Not covered by TMDL
IA 04-LDM-1058	Williamson Pond	A1	5a	4a	Algal Growth: Chlorophyll a - Covered by TMDL
IA 06-LSR-1653	West Okoboji Lake - Main Basin South	HH	3a	1	Human Health - Fish Tissue

Topic: Nitrate Standards & Drinking Water (Class C)

Commenters: 03, 06, 09, 11, 12, 13, 16–184.

Issues Raised: Commenters argue that the 10 mg/L nitrate standard should be treated as an acute risk due to its association with methemoglobinemia (Blue-Baby Syndrome). The commenters criticize the DNR's use of the "10% binomial rule," stating that any exceedances in raw source water threatens public health and causes high treatment costs for utilities. Additionally, commenters requested that the previously 2024 EPA overlisted segments, that were later rescinded by the EPA, be added to the 2026 impaired waters list.

DNR Technical Response:

Regulatory Framework

The DNR regulates nitrate under Class C (drinking water) criteria, utilizing the Safe Drinking Water Act's (SDWA) Maximum Contaminant Level (MCL) of 10 mg/L. This standard is applied as a *chronic* measure of raw source water quality under the Clean Water Act (CWA), whereas the SDWA ensures *acute* protection for treated water at the "tap."

SDWA Primacy: Distinguishing Raw vs. Treated Water

To maintain primacy over the federal SDWA, the DNR must ensure that its state drinking water program is at least as stringent as federal requirements. This authority allows Iowa to implement and enforce regulations locally. However, it is essential to distinguish how the 10 mg/L standard applies across different regulatory environments:

- **Treated Drinking Water (SDWA Authority):** Under the SDWA, the 10 mg/L MCL is an acute standard. For a public water supply, a single exceedance in the water delivered to the consumer (at the "tap") constitutes a violation. This ensures immediate protection against health risks like methemoglobinemia through mandatory public notification and corrective action.
- **Raw Source Water (CWA Authority):** Under the CWA, the 10 mg/L limit is used as a chronic water quality criterion. Because public water utilities are designed to manage source water through blending or treatment processes before it reaches the public, the DNR assesses the raw, untreated water using a statistical methodology rather than a single-sample "acute" trigger.

The Purpose of the Impaired Waters List (Section 303(d)): It is critical to understand that the Impaired Waters List is a diagnostic tool for long-term watershed management, not a real-time emergency response system.

- **Long-Term Planning:** Identifying a water body as "impaired" for nitrate triggers a multi-year process, including the development of a Total Maximum Daily Load (TMDL) or an equivalent watershed plan. These plans identify long-term pollution trends and implement conservation strategies, such as agricultural best management practices, that take place over years or decades.
- **No Short-Term Solution:** Unlike the SDWA, which requires immediate utility intervention if treated water exceeds 10 mg/L (like switching wells or increasing treatment), a CWA impairment

listing provides no short-term remedy for a spike in nitrate levels. Applying an "acute" (single-hit) standard to the Nitrate Class C assessment methodology would misalign the tool's purpose. It would label waters as "impaired" based on transient events that the regulatory framework of the CWA is not equipped to resolve in the short term.

Biological Basis: Human "Acute" vs. Aquatic Life "Acute": The term "acute" is used differently depending on whether the standard is protecting human health or aquatic life (fish and benthic macroinvertebrates).

- **Acute Standard for Humans (Nitrate):** This is based on a specific biological vulnerability in human infants. In babies under six months, nitrate is converted to nitrite in the digestive tract, which then prevents blood from carrying oxygen (methemoglobinemia). Because this reaction can happen within hours or days of drinking contaminated water, the 10 mg/L drinking water standard is considered "acute" for people.
- **Acute Standard for Aquatic Life:** In the world of biology and ecology, an "acute" aquatic life standard (like those for ammonia or lead) is designed to prevent the literal death of fish or other organisms from a single, short-term exposure. Currently, the EPA does not have a federally mandated "acute" aquatic life criterion for nitrate because most aquatic species are significantly more tolerant of nitrate than human infants.

The DNR applies the 10 mg/L nitrate limit as a **Human Health** criterion, not an aquatic life criterion. This means the statistical assessment (the 10% Binomial rule) is appropriate for identifying chronic source water issues,¹ while the SDWA remains the shield for the acute human health risk at the tap. By using the 10% Binomial rule, the DNR ensures that an impairment listing is based on a sustained pattern rather than a single "outlier" sample.

Topic: Continuous Nitrate Sensor data and Volunteer Data

Commenters: 11, 13, 181, 182

Issues Raised: Commenters urge the DNR to use real-time, continuous nitrate sensor data from the Iowa Institute for Hydrologic Research (IIHR) and USGS, arguing that monthly grab samples miss significant variation and peaks. Additionally, commenters request that the DNR utilize volunteer data for 303(d) impairments.

DNR Technical Response:

Continuous Continuous Nitrate Sensor data

¹ U.S. Environmental Protection Agency letter to Iowa Department of Natural Resources, February 6, 2002, page 10; "On September 18, 2000, IDNR revised its Class "C" criteria. These criteria are listed in Table 1. The change was made to more accurately reflect the application of the criteria as human health numerical criteria to protect against chronic effects versus the prior representation of the values as acute criteria. . . . EPA approves these revisions because they result in criteria that ensure the protection of designated uses in accordance with the CWA and EPA's implementing regulations at 40 C.F.R. 131.5(a) and 131.11(b)(1)(iii)."

DNR acknowledges the value of continuous nitrate sensor data for understanding water quality dynamics, but there are several statutory and methodological requirements that dictate how this data can be utilized for official Clean Water Act Section 303(d) assessments.

- **Compliance with Iowa's Credible Data Law:** All data used to place a waterbody on the state's 303(d) impaired waters list must strictly comply with Iowa's Credible Data Law . This law mandates that data used for regulatory impairment listings adhere to certain rigorous standards and requirements. See Iowa Code Sections 455B.171(4), 455B.193 through 455B.195; and 567 IAC 61.10-13.
- Continuous sensor data is often used in 303(d) assessment for certain analytes.
 - Dissolved oxygen, pH, temperature sensors meet Iowa's Credible Data Law because they use accepted certified methods for determination of the values.
- **Technical limitations:** Nitrate sensors require analytical discrete samples to be collected to create a rating curve resulting in an estimated value. Estimated data can be biased at high or low levels due to curve estimations. Additionally, high turbidity can interfere with the values (certain sensors are only capable of handling up to 1000ntu).
 - To use continuous nitrate data for regulatory thresholds, the DNR would need to develop and adopt a distinct, standalone assessment methodology specifically tailored to continuous nitrate data, much like the separate methodology the DNR had to develop to properly assess continuous dissolved oxygen (DO) monitoring data.

Volunteer Data

The DNR highly values the dedication of volunteer water monitors and recognizes that their efforts are instrumental in engaging the community and screening local watersheds for potential issues. However, the DNR's ability to use volunteer-generated data for official Clean Water Act Section 303(d) impaired waters assessments is strictly subject to Iowa's Credible Data Law.

- **Compliance with Iowa's Credible Data Law:** Data must comply with Iowa's Credible Data Law to be used for an official 303(d) impairment listing (Category 5). (Iowa Code Sections 455B.171(4), 455B.193 through 195; see also 567 IAC 61.10-13).
 - Iowa law dictates that regulatory decisions must be based on "credible data," which is statutorily defined as "scientifically valid chemical, physical, or biological monitoring data collected under a scientifically accepted sampling and analysis plan, including quality control and quality assurance procedures." DNR has developed Quality Assurance Project Plans (QAPP(s)) to define strict quality control and quality assurance procedures. Data collected by volunteers without a QAPP cannot legally be used to add a segment to the state's impaired waters list.
- **Third Party QAPP Approval:** A QAPP must be approved by DNR prior to the commencement of data collection if that data is intended for regulatory use (such as 303(d) impairment listings). Data collected without a pre-approved QAPP may still be highly valuable for local

watershed planning or education, but it cannot be used because it does not meet Iowa's Credible Data Law.

- **The "WINOFI" Distinction:** WINOFI serves as a vital repository for a wide range of water quality data, including volunteer monitoring and "secondary" data. While this data is essential for screening and identifying areas of concern, it does not meet the standards required for a Category 5 (Impaired Waters) listing.
 - **The Pathway for External Groups:** The DNR acknowledges the need for a pathway regarding the use of external data for regulatory decision-making, specifically concerning the transition from the WINOFI to Category 5 (Impaired Waters) listings. The DNR is committed to working towards a process for external groups (e.g., NGOs, Watershed Management Authorities, and Academic Institutions) to develop approved QAPPs that will be needed prior to the collection of data that would be utilized in future IRs.
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Topic: Assessment Windows and Delistings

Commenters: 11, 13, 96, 181, 182, 183, 184, 185, 186

Issues Raised: Commenters requested expanding the assessment window from three years to five to account for climate variations like droughts and also expressed uncertainty regarding delisted impairments reflecting actual water quality improvement and those delistings being affected by the IR data collection period.

DNR Technical Response:

Data Analysis Window: The DNR has used a three-year and five-year data assessment window for various types of assessments for over 20 years. The five-year assessment window is used in cases where there are a low number of sampling events per year.

- The Ambient Lakes Monitoring Program only has the capacity to collect samples three times a year on a routine basis. For these low numbers of annual sampling events, a five year monitoring data window is needed.
- The Ambient Streams Monitoring Program has a much higher sampling event count per year. Each monitoring location produces enough monitoring results to complete monitored assessments in a three-year monitoring window. The use of a three-year window also ensures that the assessment evaluates the most recent ambient conditions.

Commenters raised a concern that using a short monitoring window can mask pollution due to a temporary reduction in runoff. However, using a five-year monitoring plan can also mask pollution from discrete events due to large sampling event counts.

Delistings: Delisting an impairment for a segment (waterbody) off of the Impaired Waters List is a rigorous, data-driven process.

- The DNR must demonstrate “good cause” to the EPA to delist an impairment. “Good cause” can be demonstrated by one of the following reasons: more recent or accurate data showing full support of the designated use; new environmental conditions showing that the segment no longer meets the criteria for impairment; or flaws in the original analysis that when reanalyzed shows full support.
- The commenters raised the concern that Total Maximum Daily Load (TMDL) development might be delayed or prevented by a premature delisting.
- For the 2026 IR, 51 delistings were a result of the following:
 - TMDL preparation and approval (23),
 - biological sampling showing recovery following a fishkill (21),
 - biological sampling showing recovery from a biological impairment (6), and
 - assessment error (1).
- In the remaining 32 delistings for the 2026 IR where new data indicated water quality improvement, many of the delistings for reservoir, lake, and shallow lake impairments relied on 4 or 5 years worth of data.

Delisting Reason	# impairments
TMDL preparation and approval	23
Fish kill recovery	21
Recovery of fish/invertebrate community	6
Assessment Error	1
New data: WQ improvement - pH	10
New data: WQ improvement - Bacteria: Indicator Bacteria- E. coli	7
New data: WQ improvement - Organic Enrichment: Low Dissolved Oxygen	4
New data: WQ improvement - Algal Growth: Chlorophyll a	3
New data: WQ improvement - pH- High	2
New data: WQ improvement - Temperature: Thermal Modifications	2
New data: WQ improvement - Turbidity: Secchi Disk Transparency	2
New data: WQ improvement - Sedimentation/Siltation	1
New data: WQ improvement - Turbidity: Suspended Solids	1
Total	83

Topic: Algal Blooms and Narrative Standards

Commenters: 181, 182.

Issues Raised: Commenters state that in the absence of numeric criteria for microcystin, the DNR must apply narrative standards that prohibit aesthetically objectionable conditions" to list lakes with repeated microcystin beach advisories as impaired.

DNR Technical Response:

- The DNR operates in alignment with EPA's 2019 recommendation of 8 ug/L for microcystins as a swimming advisory threshold, rather than EPA's alternative recommendation of a codified regulatory standard for impairment listing.
- In early 2020, after a detailed review of the criteria and underlying science, the DNR and Iowa Department of Public Health agreed to utilize the microcystin threshold value in the beach monitoring program for the purpose of posting swimming advisories.
- The DNR is continuing to evaluate the recommended criteria to decide on further future action on the subject.

The DNR uses the Chlorophyll, a Trophic State Index that assesses algae production/growth provides a more stable, reliable basis for the long-term planning required for watershed restoration. Microcystin levels are notoriously unstable. They can spike and disappear within hours based on wind, sunlight, and temperature. Applying a rigid narrative standard to these fleeting events may lead to inconsistent and scientifically indefensible listings.

There is a difference between a public health advisory and a regulatory standard.

- **Beach Advisories (Management Tools):** These are real-time warnings designed to help the public make safe decisions about swimming on a specific day or week.
- **Impaired Waters List (Regulatory Standards):** The 303(d) list is a diagnostic tool for long-term legal and environmental planning. A temporary advisory for a transient bloom does not automatically mean an entire water body is "legally impaired" for the long term under the Clean Water Act.

EPA Recreation Microcystin Technical Guidance: In July of 2021 EPA issued the "Final Technical Support Document: Implementing the 2019 National Clean Water Act Section 304(a) Recommended Human Health Recreational Ambient Water Quality Criteria or Swimming Advisories for Microcystins and Cylindrospermopsin" which gave guidance on how to implement adopted 304(a) criteria for Microcystins and Cylindrospermopsin.

- Based on the EPA technical guidance, which allowed for three 10 day events to be considered an exceeding season and one exceeding season in the monitoring period to be considered fully supporting, only one segment (Lake Darling) would have been suggested for a microcystin impairment if Iowa had adopted the 304(a) criteria.
- Excess nutrients in lakes that could potentially cause microcystin impairments at Iowa's beaches are already being addressed through nutrient TMDLs based on violations of Iowa's numeric pH criteria, numeric dissolved oxygen criteria, or narrative criteria (TSI chlorophyll a). In the case of

Lake Darling a TMDL has already been approved for Nutrients and Siltation which already target the drivers that can lead to cyanobacteria blooms that may contain toxins.

Microcystin in Drinking Water: The EPA established non-regulatory 10-day Drinking Water Health Advisories (HAs) for microcystins, which are not legally enforceable federal standards but serve as technical guidance for public water systems. This threshold was not designed as raw water criteria. While raw river microcystin data is available, there is no suggested raw drinking water criteria to compare it to. Thus, the data were not assessed for the 2026 assessment cycle.

Topic: TMDL Development and Prioritization

Commenters: 02, 06, 08, 11, 15, 181.

Issues Raised: Commenters state that impairments are being overlooked for TMDL development in several water bodies and Outstanding Iowa Waters (OIWs) have a low priority (Tier III/IV) assigned to them.

DNR Technical Response:

Iowa's TMDL Vision 2024 includes numerous priority parameters focused on partnerships with implementation partners, impairments with high social impact (such as recreational impairments), and efficiency. For further information about Iowa's TMDL Vision 2024 and the priority structure, please refer to the document 'Iowa's TMDL Vision 2024' on the WQIP webpage (<https://www.iowadnr.gov/environmental-protection/water-quality/watershed-improvement/watershed-planning/water-quality-improvement-plans>).

Response to Specific Concerns

- New sampling for TMDL development for recreational impairments on rivers and beaches took place in 2025. Sampling occurred in the Upper Iowa River basin in partnership with EPA Region VII, and an additional sampling event in West Lake Okoboji. The data is being used to create TMDLs on two beaches.
- The Vision gives additional priority points for a TMDL applying to multiple impairments in an effort to prioritize severe and pervasive problems, which includes lakes with multiple impairments (ex. Big Hollow Lake had four impairments; 1 priority point) and also watersheds with multiple segments with the same impairment (ex. Upper Iowa River basin has 54 indicator bacteria impairments; 2 priority points).
- Yellow Smoke Park Lake (Segment 1514) is currently impaired for a historic mercury consumption advisory. Mercury in fish tissue impairments are currently low on the TMDL priority tier system due to its ties to air pollution. For more information on mercury in Iowa fish, please visit: <https://www.iowadnr.gov/environmental-protection/water-quality/water-quality-monitoring-assessment/fish-consumption-safety>
- DNR has an ambient stream monitoring site on Segment 1502 of the Boyer River. Boyer River Segment 1502 has a Class A1 (recreation) use E. coli impairment and a Class BWW1 (aquatic life)

use selenium impairment. The Class A1 use impairment is a middle TMDL priority and DNR is in the process of monitoring and completing several recreational use E. coli TMDLs across the state. The Class BWW1 selenium impairment is a low TMDL priority; however, there are several western Iowa streams with selenium impairments. DNR plans to study this issue to determine if the selenium is background concentration or is elevated as a result of stream inputs.

- Big Spirit Lake does not have nutrient related impairments, and as such, priority can not be given points for stakeholder involvement in nutrient reducing restoration projects. Currently, Big Spirit Lake only has one impairment, which is for bacteria at the beaches. This impairment is given a Tier II TMDL priority, and only work within the beach watershed can count towards increasing the prioritization. The TMDL Program is working with the monitoring programs to determine additional sampling needs to address this impairment due to the raised priority status.

Topic: Human Health Criteria Adoption and the Use of Narrative Standards

Commenter: 181.

Issues Raised: Commenters requested that the DNR use Iowa's Class Human Health (HH) narrative standards to evaluate fish tissue in state waters against EPA's Class HH criteria recommendations and list non-attaining waters as impaired on the Section 303(d) list.

DNR Technical Response:

Class HH are waters in which fish are routinely harvested for human consumption or waters both designated as a drinking water supply and in which fish are routinely harvested for human consumption.

- In partnership with the Iowa Department of Health and Human Services, the DNR provides awareness and education related to fish consumption. This can be found at: <https://www.iowadnr.gov/environmental-protection/water-quality/water-quality-monitoring-assessment/fish-consumption-safety>.
- Iowa's Water Quality Standards (WQS) include a general narrative criterion stating that "all substances toxic or detrimental to humans... shall be limited to nontoxic or nondetrimental concentrations in the surface water." For Class HH (Human Health) waters specifically, the narrative standard requires that these waters "shall contain no substances in concentrations which will make fish or shellfish inedible... or cause a hazard to humans after consumption."
- For pollutants where no numeric criterion exists, DNR evaluates available data against the "hazard to humans" narrative threshold. A listing requires a "technical, science-based rationale" to demonstrate that the concentration of a substance in ambient water or fish tissue specifically violates the narrative standard.
- DNR is currently reviewing EPA-recommended human health criteria as part of the State's Triennial Review of Water Quality Standards. Formally adopting updated numeric criteria is the

DNR's preferred path for improving the transparency and consistency of impairment listings, as it provides clear thresholds for both the DNR and the public to evaluate water quality.

Topic: Expanding monitoring programs and addressing not assessed segments

Commenters: 01, 02, 06, 07, 181.

Issues Raised: More segments need to be monitored across the state to address not assessed segments. The DNR needs to switch to a rotational based monitoring plan.

DNR Technical Response: The DNR continues to implement standardized and robust ambient stream monitoring, ambient lake monitoring, wetland monitoring, shallow lakes monitoring, fish tissue monitoring, stream biological sampling, and beach human health surveillance programs. In addition to the data collected as a part of Iowa's monitoring programs, the DNR utilizes data from external agencies and sources to complete Iowa's Section 303(d) List. The DNR routinely collaborates with many of these external agencies to coalign the needs of the various sampling programs; for example, see Table 2, page 12 of IR methodology. The DNR has supplemental monitoring programs that rotate around the state to different monitoring sites but those sites are generally selected based on impairments and potential impairments. If additional funding becomes available, ambient monitoring programs have plans to expand the monitoring of sites and/or parameters.

The DNR houses the majority of its water monitoring data in its public facing water quality database AQUiA (<https://programs.iowadnr.gov/aquia/>). The DNR does not recommend using the Section 303(d) List for trend analysis due to its threshold-based analysis of the site specific data. AQUiA contains an abundance of data (significantly greater in quantity relative to many states' data) to use in performing long-term trend analysis. Additionally, the AQUiA website contains graphing tools to look at trends for all analytes at each sampling location. In addition to the ambient stream and lakes monitoring programs, the DNR also began collecting water quality information at additional lakes (starting in 2018) on a rotational basis. Additional stream water quality data collection began in 2021. Of note, it takes 3 to 5 years for sufficient data to be collected at new sites prior to inclusion in the IR, and an additional 2 years for the first monitored assessments to be completed. Prior to that time, the additional monitoring data will be assessed as evaluated, and potential impairments will be placed on the Waters in Need of Further Investigation (WINOFI) list.

Topic: Biological Assessment Clarification

Commenters: 14.

Issues Raised: Stated the East Branch of the Iowa River is "now devoid of life" and killed by farm chemicals.

DNR Technical Response: The 2025 Fish Index of Biotic Integrity (FIBI) score at East Branch Iowa River, Goodell Site 189 was 48 (out of 100). That score is nearly identical to the average score for reference sites in the Des Moines Lobe ecoregion and is considered a passing score for aquatic life designated use assessments.

DNR has biologically sampled two sites on the East Branch Iowa River a total of 11 times in the last 25 years. One of the sites is near Belmond and the other is near Goodell. The total number of fish captured in the 11 samples is over 4000. In addition, over 5500 benthic macroinvertebrates (e.g. aquatic insects, snails, crawdads, etc.) have been collected in the last 25 years. For more information about the biological sampling conducted on the East Branch Iowa River, see the links below.

<https://programs.iowadnr.gov/bionet/sites/189>

<https://programs.iowadnr.gov/bionet/sites/190>

Topic: Des Moines River fish kill impairment clarification

Commenters: 04

Issues Raised: The use of unknown toxicity for fish kill impairment cause is not descriptive enough.

DNR Technical Response: There are five segments of the Des Moines River, from the Ottumwa dam to the Mississippi River, that have Class BWW1 aquatic life fish kill impairments, including segment 1010 in Wapello county. For segment 1010 in Wapello county, the Class BWW1 aquatic life use was assessed as “not supported” due to 2002, 2006, 2012, and 2023 fish kills. These kills are in a series of kills that have occurred over the last 25 years that involve primarily shovelnose sturgeon (*Scaphirhynchus platyrhynchus*). Although the cause(s) of the fish kills remains unknown, low flow conditions, flow alterations, and very high water temperatures are believed to have contributed to the kills. Other possible causes include: elevated pH levels caused ambient levels of ammonia in the river to be toxic to the ammonia-intolerant shovelnose sturgeon or the kills were caused by a virus specific to shovelnose sturgeon. Therefore, the unknown toxicity is not referring to an unknown toxicant, it is referring to toxicity from low dissolved oxygen, high temperature, or high levels of ammonia. Results from 2016 fish tissue sampling in Segment 1010 indicated very low levels of mercury, chlordane, and total PCBs in both white bass and channel catfish.

Topic: Methodology change and transparency

Commenters: 07

Issues Raised: IR methodology did not seem consistent over time.

DNR Technical Response: While there have been changes to the assessment methodology over time, the application of the methodology has remained consistent. From year to year, small changes have been

implemented to add clarity to the process, creating new sections to handle new programmatic data, updating sections and tables to incorporate new or updated criteria, etc. These changes are noted in the beginning of every IR methodology document and all finalized documents are all located at the state library (<https://publications.iowa.gov/>) and on the ADBNet website (<https://programs.iowadnr.gov/adbnnet/Docs/Publications>).

Topic: PFAS

Commenters: 96

Issues Raised: Commenter was concerned about the presence of forever chemicals (PFAS) in Iowa waters.

DNR Technical Response: DNR's PFAS Task Force has developed a PFAS action plan that can be found on at (<https://www.iowadnr.gov/environmental-protection/water-quality/pfas>). The EPA developed PFAS drinking water standards in 2024. Public drinking water supplies are monitoring the compounds through 2027 and implementing plans for reductions, if needed, by 2029. However, EPA has active rulemaking on this issue. Once the rule is finalized, the state of Iowa would need to evaluate the proposed standard prior to adoption. After that point the IR team could use some or all of the PFAS criteria for assessment.

Topic: Letters containing support of the DNR's efforts.

Commenters: 06, 07, 10, 86, 183, 184

DNR Response: The DNR acknowledges receipt of the comments.

Topic: Agency Referrals

Commenters: 187–193.

Action Taken: While these concerns fall outside the regulatory scope of the 303(d) listing process, the DNR forwarded these comments to pertinent field offices, the DNR Water Supply Engineering Section, and the US Army Corps of Engineers.

Topic: General water quality emails and letters received.

Commenters: 194–238.

Action Taken: The DNR acknowledges receipt of the comments; however, these comments did not directly apply to Iowa's Draft 2026 Section 303(d) List or IR methodology.

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Appendix B: Full Text of Public Comments

COMMENTER 01: Daryl James, private citizen

Date Received: February 18, 2026, e-mail

Comment:

----- Forwarded message -----
From: <ADBNet-donotreply@dnr.iowa.gov>
Date: Wed, Feb 18, 2026 at 8:11 PM
Subject: ADBNet - ContactUs Request
To: <jamie.mootz@dnr.iowa.gov>, <ken.krier@dnr.iowa.gov>, <daniel.kendall@dnr.iowa.gov>, <samuel.nutting@dnr.iowa.gov>

Contact Name: DJ
Contact Email: daryljames2000@gmail.com

Request:

I've seen the list of impaired water ways in Iowa and noticed my local water source and recreational body of water was listed as "not assessed" in the draft. I was wondering if there were plans to address the not assessed waters or how an individual could help assess more of the not assessed waters. Any feedback would be greatly appreciated!

COMMENTER 02: Rashun Peterson, private citizen

Date Received: February 18, 2026, e-mail

Comment:

Public Comment on the 2026 Impaired Waters List - Crawford County

1 message

Rashun Peterson <braidsgalore@yahoo.com>
To: IRcomment@dnr.iowa.gov

Wed, Feb 18, 2026 at 7:24 PM

To the Iowa DNR,

As a resident of Denison and a member of the Denison Diamond Alliance, I am writing to express my deep concern regarding the continued impairment of the Boyer River and Yellow Smoke Lake. Our community deserves clean water for our health, our children, and our future. We ask for increased monitoring and a clear plan of action to restore the water quality in Crawford County. We are paying attention.

-Crawford County resident

COMMENTER 03: Sandra Mac., private citizen

Date Received: February 20, 2026, e-mail

Comment:

Nitrates and forever chemicals

1 message

Sandra - Yahoo <sandymac1961@yahoo.com>
To: IRcomment@dnr.iowa.gov

Fri, Feb 20, 2026 at 12:34 AM

I and others would like to see the Des Moines River and raccoon river tested from when they ENTER OUR STATE AND Algona/Webster City/Ft Dodge area, then Ames, before and after Des Moines, and another test when leaving the state. Would love to see exactly WHERE there are spikes to address the problems.

Thank you.

COMMENTER 04: Toby Harley, private citizen

Date Received: February 24, 2026, e-mail

Comment:

Discrepancy

1 message

toby187harley911@gmail.com <toby187harley911@gmail.com>
Reply-To: "toby187harley911@gmail.com" <toby187harley911@gmail.com>
To: "ircomment@dnr.iowa.gov" <ircomment@dnr.iowa.gov>

Tue, Feb 24, 2026 at 12:25 AM

In the water report in the des moines river at wapello county it says no for recreation and not supporting fish life that fish have died due to an unkown toxin...then says human safty or whatever is ok...how can that be true if fish are dying and you dont kniw what they are dying from even... wouldnt that imply that human health is at risk at the very least and wouldnt it also mean that human health is unsure if you have no idea what the toxins in the water system are????! I mean i dont understand how that could possibly be acurate statement. And how can you not know what the toxin is is it an unkown alien toxin i thought by now there wouldnt be too many unkown sources of toxins in our water supplies...furthermore i would say if u do not know then you could also not know how safe it is for human recreation even for that matter. I just want to understand how u can approve it for recreation and human health buy say that it is killing fish for unknown reasons. That dont add up to me at all.

[Yahoo Mail: Search, Organize, Conquer](#)

COMMENTER 05: Gaylen Wobeter, private citizen

Date Received: February 27, 2026, e-mail

Comment:

Iowa's Water Quality

1 message

Gaylen Wobeter <gaywob@live.com>
To: "IRcomment@dnr.iowa.gov" <IRcomment@dnr.iowa.gov>

Fri, Feb 27, 2026 at 8:39 PM

As a lifelong Iowan, I am shocked by the state of Iowa's lakes, rivers, and streams. Our laws have made it optional to do mitigation in rural areas. Especially concerning is the agricultural runoff from CAFO's and fertilizer usage on land. The nutrient reduction strategy is voluntary and the scientific data about our water quality shows that since that legislation became law, our water quality has decreased dramatically. Having clean water is basic to the quality of life and to life itself. How can we let this continue? We are harming the lives of Iowans of all ages, to say nothing of all the people, animal and plant life that are impacted as our polluted water goes down the Mississippi to the Gulf. Please do what is right and healthy for Iowa's future, and quit protecting the large industrial agricultural industry and the people who make huge sums of money from this industry.

Gaylen Wobeter
Iowa City, Iowa

COMMENTER 06: Jacob Carr, private citizen

Date Received: March 2, 2026, e-mail

Comment:

Public Comment on Draft 2026 Iowa Integrated Report (Impaired Waters) – Prioritize Action on Nitrates/Pesticides

1 message

Jacob Carr <jacob.carr535@gmail.com>

Mon, Mar 2, 2026 at 10:18 AM

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

To: IRcomment@dnr.iowa.gov

Hello Iowa DNR Integrated Report Team,

I am an Iowa resident in Sioux City, 51104. I am submitting a public comment on the Draft 2026 Iowa Integrated Report / 303(d) Impaired Waters List during the current public comment period.

I am deeply concerned about the water quality in Iowa especially for drinking. I have taken many steps in the past few years to purify the water in my home as I do not trust drinking water from the tap. I am mostly concerned about reducing glyphosate and nitrates in my drinking water and have bought filters for that purpose. I also am concerned about the safety of lakes and rivers. Many lakes and rivers around sioux city(Bacon Creek, Browns lake, Big sioux recreation area) are either contaminated and not safe for contact or have insufficient data. Please ensure that these bodies of water are prioritized for action including transparent monitoring and progress reporting.

I support stronger upstream pollution controls and funding for monitoring and cleanup efforts. Please prioritize timely development and implementation of restoration strategies for impaired waters especially those polluted by nitrates and pesticides.

Thank you for the opportunity to comment and for your work on Iowa's water-quality assessment and restoration efforts.

Sincerely,

Jacob Carr
[620 Shady Ln, Sioux City, IA 51104](#)
515-480-0905

COMMENTER 07: Pat Boddy, PE, private citizen

Date Received: March 16, 2026, e-mail

Comment:

Draft IR Report

1 message

Pat Boddy <patriciaboddy@gmail.com>
To: ircomment@dnr.iowa.gov

Mon, Mar 16, 2026 at 10:03 PM

We do not have sufficient clarity around Iowa's water quality. The rating system is overly complex. I've never felt good having to live with these segmented streams. Our goals should be fishable, swimmable and readily drinkable across the water body spectrum.

Assessment criteria does not seem consistent over time. Meanwhile, we have too many water bodies in need of basic assessment.

Our highest quality monitoring system through IIHR is running out of money.

Resources available for development, completion and implementation of TMDLs is wholly inadequate. Undoubtedly, we have more river segments that should be listed as impaired and in need of TMDLs than we currently have listed.

I appreciate the DNR staff continue to do their best with the limited resources and restrictive processes they are forced to use but the political environment for this work does not respect the need for protected soil and clean water resources. This report reflects this reality.

Respectfully,

Pat Boddy, PE
7932 Rocklyn Dr, Urbandale, IA 50322
515-669-1099 (cell)

COMMENTER 08: Pam Mackey Taylor, Director, Sierra Club Iowa Chapter

Date Received: March 16, 2026, e-mail

Comment:

comments on draft integrated water quality report and 303(d) list

1 message

Pamela Mackey Taylor <pamela.mackey.taylor@sierraclub.org>
To: ircomment@dnr.iowa.gov
Cc: Wally Taylor <wtaylor784@aol.com>

Mon, Mar 16, 2026 at 3:51 PM

See the attached comments from the Iowa Chapter of the Sierra Club concerning the 2026 draft integrated water quality report and the 303(d) list.

Thank you for considering these comments.

Pam Mackey Taylor
Director
Sierra Club Iowa Chapter

 2026impaired waters list comments.pdf
452K



March 16, 2026

Iowa Department of Natural Resources
Attention: IR Comments
Water Quality Monitoring & Assessment Section
6200 Park Ave., Suite 200
Des Moines, IA 50321
Via email: IRComment@dnr.iowa.gov

RE: 2026 draft integrated water quality report, including the 303(d) list

Greetings:

The following comments on the 2026 integrated water quality report, including the 303(d) list, are submitted on behalf of the Iowa Chapter of Sierra Club. The Iowa Chapter is the oldest and largest grass roots environmental organization in Iowa, with approximately 7,000 members throughout the state. We have been leaders in advocating for water quality in Iowa for many years. The Iowa Chapter was one of the parties engaged in litigation in 1999-2001 that led to the initiation of the TMDL program in Iowa.

The 303(d) list identifies those water segments that do not meet water quality standards and need a TMDL to be prepared. On the current 303(d) list are numerous water segments that have been on the list since 2004, 2006, and 2008, with no TMDL having been prepared. Some of those waters on the list since 2008 are designated as Outstanding Iowa Waters pursuant to Iowa's Antidegradation Policy. Those waters are: Bloody Run Creek, Clear Creek, Deer Creek, Dousman Creek, French Creek, North Bear Creek, Pine Creek, Trout Run, Trout River, and Waterloo Creek. 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."

I have reviewed the Department's Prioritization and Scheduling of Waters for TMDL Development document. It does not really describe how the prioritization decisions were made. With special focus on the Outstanding Iowa Waters, most of which are premier trout fishing streams, it would seem that they should receive priority. These waters, given their status and their high social impact as trout streams, are not given their proper priority in the scoring system.

I also note that the scoring for multiple impairments in the water segment is designed to ensure that many waters will not be scored appropriately. It does not appear that any of the waters in the

Sierra Club Iowa Chapter, PO Box 1058, Marion, IA 52302
3839 Merle Hay Road, Suite 280, Des Moines, Iowa, 50310. 515-277-8868
Email: iowa.chapter@sierraclub.org Web: www.sierraclub.org/iowa Facebook: Iowa Chapter Sierra Club



2026 list have more than 2 impairments. So, a water with 5 impairments, which doesn't exist, would still only get 1 point. In order to properly score for multiple impairments, more than one impairment should garner 2 points. And perhaps, 3-5 impairments should score 3 points, etc.

The Prioritization and Scheduling document also claims to have been guided by EPA's 2022-2032 Vision document for the 303(d) program. That document emphasizes implementation of TMDLs. But the DNR, as far as I can tell, has done nothing to implement the TMDLs over the last 20 plus years. The 303(d) list and the TMDLs mean nothing if the TMDLs are not implemented.

In summary, it appears over the years, including in the 2026 303(d) list, the DNR is doing just the bare minimum to keep the EPA from taking any action against the Department. We must do better.

/s/ *Wallace L. Taylor*

WALLACE L. TAYLOR AT0007714
Law Offices of Wallace L. Taylor
4403 1st Ave. S.E., Suite 402
Cedar Rapids, Iowa 52402
319-366-2428;(Fax)319-366-3886
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ATTORNEY FOR SIERRA CLUB
IOWA CHAPTER

Sierra Club Iowa Chapter, PO Box 1058, Marion, IA 52302
3839 Merle Hay Road, Suite 280, Des Moines, Iowa, 50310. 515-277-8868
Email: iowa.chapter@sierraclub.org Web: www.sierraclub.org/iowa Facebook: Iowa Chapter Sierra Club

COMMENTER 09: Renae Angeroth, private citizen

Date Received: March 17, 2026, e-mail

Comment:

Public Comment - 2026 draft Iowa Impaired Waters list

1 message

Renae Angeroth <Renae.Angeroth@messages.fwwatch.org>

Tue, Mar 17, 2026 at 8:02 PM

Reply-To: Renae Angeroth <renae.angeroth@prodigy.net>

To: IRcomment@dnr.iowa.gov

Dear Iowa Department of Natural Resources,

Iowa can no longer brag about clean air, pure water, and healthy soil. We need to address honestly what is happening to these precious resources. It does no one any good to ignore nitrate pollution in the state's rivers and streams. Without acknowledging the problem, the pollution will continue and the population will suffer physical effects. Please revise your list of impaired waters to completely and honestly reflect the serious threat of nitrate pollution in Iowa's waterways.

Iowans deserve clean, safe drinking water, free of dangerous cancer-causing pollutants. The DNC needs to revise its impaired waters list to fully and accurately reflect the serious threat of nitrate pollution in Iowa's waterways, including relisting the seven waters that EPA added to Iowa's 2024 impaired waters list.

Sincerely,
Renae Angeroth
6206 SE Vandalia Dr
Pleasant Hill, IA

COMMENTS 10: Brad Hartkopf, Senior Director, Public Policy, Iowa Association of Business and Industry (ABI)

Date Received: March 18, 2026, e-mail

Comment:

ABI Comments on 2026 Impaired Waters List

1 message

Brad Hartkopf <bhartkopf@iowaabi.org>

Wed, Mar 18, 2026 at 9:47 AM

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

Good morning,

Please see the attachment, which are the comments the Iowa Association of Business and Industry (ABI) is submitting in support of IDNR's 2026 draft impaired waters list.

Thank you,

Brad

BRAD HARTKOPF

Senior Director, Public Policy

D: 515.235.0576 | C: 712.249.8589



400 E Court Ave, Ste 100 | Des Moines, IA 50309

www.iowaabi.org

 **DNR Comments 3.18.26 (FINAL).pdf**
145K



March 18, 2026

Iowa Department of Natural Resources
Water Quality Monitoring & Assessment Section
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321

RE: IR Comments

To Whom it May Concern:

The Iowa Association of Business and Industry (ABI) appreciates the opportunity to provide comments on the State of Iowa's Draft 2026 Impaired Waters List and Draft Methodology for Iowa's 2026 Water Quality Assessment, Listing, and Reporting Pursuant to Sections 305(b), 303(d), and 314 of the Federal Clean Water Act prepared by the Iowa Department of Natural Resources (IDNR).

ABI was established in 1903 and is the state's oldest and largest business organization. ABI has member companies in Iowa's 99 counties that employ more than 330,000 Iowans. ABI represents members in all industries, with many our members in manufacturing and construction. ABI members continue to lead the way in implementing strategies and installing technologies that comply with state and federal regulations. On behalf of ABI members and their employees, I want to take this opportunity to acknowledge the continued investment by the State of Iowa and IDNR into our natural resources.

In the IDNR's Draft 2026 methodology, an update has been made to address data usability where the available data for a toxic metal does not represent the specific fraction, portion, or species of metal expressed in the Iowa water quality standard. Table 7 of the draft 2026 methodology explains how to determine data usability for metals data with criteria-specified fraction, portion, or species. This methodology is consistent with Iowa's Credible Data requirements including specifications to use "*scientifically valid chemical, physical, or biological monitoring data*".

After reviewing the draft assessment methodology, ABI supports the proposed use of toxic metals data outlined in Table 7 of the method. This methodology will ensure that available and scientifically valid data is considered appropriately to ensure that Iowa's water quality assessment is accurate based on verifiable data as it relates to Iowa water quality standards.

Water quality assessments must rely on high quality, credible data which can demonstrate either attainment or violation of water quality standards. Improper classification of waters as impaired due to overestimation of toxicity has a direct impact on the NPDES permitting process

400 East Court Avenue, Suite 100 | Des Moines, IA 50309-2017
515.280.8000 | 800.383.4224 | www.iowaabi.org

and allocation of state resources. This has significant and lasting consequences for the public and regulated community.

The Iowa Association of Business and Industry supports the updated methodology and proposed use in Table 7. For additional information or questions regarding our comments, please contact Brad Hartkopf, Sr. Director, Public Policy at bhartkopf@iowaabi.org.

Respectfully submitted,

A handwritten signature in cursive script that reads "Nicole A. Crain".

Nicole Crain
President

COMMENTER 11: Richard Dietz, private citizen

Date Received: March 19, 2026, e-mail

Comment:

2026 impaired waters list - public comment

1 message

Richard Dietz <dietzrs56@gmail.com>
To: ircomment@dnr.iowa.gov

Thu, Mar 19, 2026 at 4:15 PM

To:

Iowa Department of Natural Resources
Attention: IR Comments
Water Quality Monitoring & Assessment Section
6200 Park Avenue Suite 200
Des Moines, IA 50321

Thank you for the opportunity to comment on the draft 2026 Iowa Integrated Report and Impaired Waters List.

I appreciate the work involved in developing this report, but I would like to raise several concerns related to transparency, methodology, and how progress toward cleaner water is communicated to the public.

First, recent history raises questions about how impairment decisions are being made and explained. In 2024, EPA partially disapproved Iowa's impaired waters list and added several nitrate-related drinking water impairments, which were later removed following subsequent action. This sequence has created confusion about how drinking water standards are being interpreted and applied. In particular, it is difficult to reconcile a framework that allows periodic exceedances in ambient waters with one that requires consistent compliance at the tap to protect public health. Additional explanation of how these differing frameworks are reconciled, and how long-term data are incorporated into listing decisions, would be helpful.

Second, it would be helpful to clarify how different sources of water quality data are considered. High-frequency monitoring data, such as that collected through the IIHR Hydrosience and Engineering Water Quality Information System, may capture the frequency and duration of elevated nitrate concentrations in ways that periodic sampling does not. Clarification on how such data are incorporated—or why they may not be used—would improve transparency.

Finally, the structure of the Integrated Report makes it difficult to assess actual progress. Waters are moved from Category 5 to Category 4 once a TMDL is completed, but they often remain impaired. At the same time, many waters remain impaired for long periods without completed TMDLs, while others are classified as needing further investigation or remain unassessed. Providing a clearer summary across all categories—including how many waters have been fully restored—would help the public better understand the overall condition of Iowa's waters and the effectiveness of current efforts.

In addition, I would like to comment on waters classified as "needing further investigation." For example, Ioway Creek has been the subject of extensive local monitoring over many years, including volunteer snapshot events, laboratory analysis through the State Hygienic Laboratory, and long-term sampling by Ames Water & Pollution Control. These data suggest that bacteria levels may consistently exceed recreational standards, yet the creek may remain in a category requiring further investigation rather than being listed as impaired. This raises questions about how different types of data—particularly long-term volunteer and local agency monitoring—are evaluated and incorporated into listing decisions. Clarification on how such data are weighted, and what thresholds must be met for waters to move from "further investigation" to "impaired," would improve transparency and public confidence in the assessment process.

Given the duration and consistency of available data, it would be helpful to understand what additional information is needed to support a formal impairment determination.

Thank you for your consideration.

Sincerely,
Richard Dietz
5782 Felber Street
Ames, Iowa 50010

COMMENTER 12: Kelley Glawe, private citizen

Date Received: March 19, 2026, e-mail

Comment:

Comments on the 2026 Impaired Iowa Waters Report

1 message

ggoodi@alpinecom.net <ggoodi@alpinecom.net>
To: IRcomment@dnr.iowa.gov

Thu, Mar 19, 2026 at 4:20 PM

Dear Iowa DNR,

I am writing to comment on the draft 2026 list of impaired waters. I began advocating for our Iowa waters for nearly a full year now. I have been overwhelmed by the troubles Iowa faces and hearing of numerous issues the media has been reporting on. New upcoming concerns, like data centers, micro plastics, and excessive water uses, proves how much more proactive we need to be before a serious issue becomes irreversible.

I am concerned that the list does not reflect the risks to drinking water due to a statewide problem of high nitrate concentrations, including in major rivers across the state. The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

I understand the funding is deficient to provide better and is poorly funded in comparison to the other neighboring states. I personally have been trying to make this issue known to others and have written to my legislators and the governor.

Regarding this current list of impaired waters, I would like to understand how the DNR plans to address and correct as much as possible and in a timely fashion. I no longer am active on the water, but my family is, boating and fishing. Without continued monitoring, data accuracy, specific processes and standards, how will this affect my family and others? I encourage the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

I hope to hear plans soon of how the DNR will resolve the current impairment of our waters and that further actions are taken to provide safety for all. People are becoming more interested in the state of our waters.

Thank you,

Kelley Glawe
257 Island View Rd
Garnavillo IA 52049

COMMENTER 13: Joan M. Flecksing, CPM, MPA, Director, Meskwaki Nation

Date Received: March 19, 2026, e-mail

Comment:

2026 Integrated Report Consultation

1 message

Joan Flecksing <joan.flecksing@meskwaki-nsn.gov>
Reply-To: joan.flecksing@meskwaki-nsn.gov
To: IRcomment@dnr.iowa.gov

Thu, Mar 19, 2026 at 4:56 PM

Hello - Please see attached comments.

Thank you,

Joan M. Flecksing, CPM, MPA

Director, Meskwaki Nation Department of Natural Resources

MESKWAKI NATION

Sac and Fox Tribe of the Mississippi in Iowa

1826 340th St., Tama, IA 52339

P: (641) 484 3511

C: (319) 361 2892

E: joan.flecksing@meskwaki-nsn.gov



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Meskwaki Nation DNR.pdf
217K



MESKWAKI NATION

The Sac & Fox Tribe of the Mississippi in Iowa

349 Meskwaki Road - Tama, IA 52339 | Ph: (641) 484-4678 | www.meskwaki.org

March 19th, 2026

To: Iowa Department of Natural Resources
From: Meskwaki Nation Department of Natural Resources
Re: 2026 Integrated Report Consultation
Date: March 19, 2026

In comment of the 2026 draft Integrated Report, comes the following:

The draft report herein question clarifies the high proportion of assessed waters that are impaired in the state of Iowa, while allowing for threats from toxic chemicals that the Iowa DNR has not yet developed standards to protect against. Therefore, further apparent is the problem with allowing regular exceedances of the 10 mg/L nitrate standard for drinking water in Iowa. For these reasons, the need to use data from reliable, real-time water monitoring sensors, throughout the state of Iowa, is increasingly apparent.

The State Of IA DNR water quality standards are in dire need of review and revision, with the end product allowing for addition of all applicable (assessed) waters to the impaired list, and so the ability to stop pollution into our waterways and so drinking water, and the ultimate removal of said waters from the impaired list.

I encourage the Iowa DNR to act accordingly to ensure Clean Water for all Iowans, their neighboring Tribal Sovereign Nations, and the natural world they are designed to protect and enhance.

Sincerely,

Joan M. Flecksing, Director
Meskwaki Nation Department of Natural Resources

COMMENTER 14: Arlyn L. Boelman, private citizen

Date Received: February 26, 2026, e-mail

Comment:

Impaired waterways

1 message

Arlyn and Ruth Boelman <arboelman@hotmail.com>

Fri, Feb 27, 2026 at 5:32 PM

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

To Whom it May Concern:

The East Branch of the Iowa River runs through the pasture ground on our small farm north of Belmond, Iowa. In 1965, when my parents purchased the farm, we were able to fish in the river while it abounded with turtles, crawdads, amphibians, and beaver. That river is now devoid of life. Farm chemicals, manure runoff, and sediments have killed all life in that branch of the Iowa River. The water still flows; farm tiles keep dumping chemical poisons in it, and manure & granular fertilizers are excessively applied to the land.

Iowa needs to put some teeth into the laws, making the polluters pay a big price for their destruction of all Iowans' natural resources. Fish kills don't just happen; they are the results of errors in judgement, carelessness, or just don't give a damn attitude. Our State legislature is bought and sold by the Iowa soybean and corn associations. Chemical row crop agriculture is king. Only when those in power stop bending the knee to them, will things change.

Simply look at the Des Moines Water Works plant. It now must run its de-nitrification plant spring, summer, fall, and part of the winter. Simply ask yourself "why" and then do something about it!

So now as a farmer, what have I done.

1. For 26 years, all of my tillable farm ground has been part of the CRP program. No chemicals and no fertilizer. The soil is being built up and weeds are controlled naturally. Yes, farm income is less but our children and grandchildren are proud of what caring for the land has done for the environment.

2. There are also 10.5 acres of pasture ground. No domestic animals. Since 2003, I have planted over 400 trees in that ground to sequester carbon and pull nitrates out of the soil so that the water that does reach the river is cleaner. Part of this tree planting process has included establishing a saturated riparian buffer area. (8 varieties of oaks, hickories, sugar maples, silver maples, sycamores, apple trees, and chestnut trees) . This has all been done at my own expense over the last 23+ years.

Good luck with your efforts of behalf of Iowans, some of which really do care.

Thanks.

Arlyn L. Boelman
8918 Daybreak Road
Johnston, IA 50131

COMMENTER 15: Joe Ulman, private citizen

Date Received: March 8, 2026, e-mail

Comment:

Public Comment
1 message

joe ulman <iaflatlander48@gmail.com>
To: IRcomment@dnr.iowa.gov

Sun, Mar 8, 2026 at 6:36 AM

Good Day,

I am commenting to provide an update on the Spirit Lake North/Howard K Vincent WPA project in the the Spirit Lake watershed. I am pleased to report that the Spirit Lake North project has successfully achieved its fundraising goals, and on-the-ground restorations led by Ducks Unlimited have been completed.

These permanent restorations replace former row-crop acres with functioning wetlands and prairie buffers, specifically designed to filter nitrogen and phosphorus before they enter Big Spirit Lake. As the DNR finalizes the 2026 Impaired Waters List, I request that these active, permanent improvements be factored into the watershed's priority status. I remain committed to working with both Iowa and Minnesota partners to move additional acres into permanent protection to ensure the long-term health of this interstate resource.

Thank you,
Joe Ulman
13620 240th Ave
Spirit Lake, IA 51360
(712)-291-0190

COMMENTER 16: James Martin-Schramm, private citizen

Date Received: March 13, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report
1 message

James Martin-Schramm <marschja@luther.edu>
Reply-To: James Martin-Schramm <marschja@luther.edu>
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Fri, Mar 13, 2026 at 1:10 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am writing to comment on the draft 2026 list of impaired waters. I am concerned that the list does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I encourage the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Thank you,

Sincerely,
James Martin-Schramm
104 Spring St
Decorah, IA 52101

Commenters 17 thru 76 submitted comments identical to comments submitted on March 13, 2026 by James Martin-Schramm ([commenter 16](#)).

COMMENTER 17: Ronald Gulla, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 18: Rachel Rovine, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 19: Barbara Jo Matson, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 20: Dave Frank, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 21: Ashley Asberry, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 22: Beth Larabee, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 23: Jami Maxson, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 24: Joel Biggs, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 25: Jim Stewart, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 26: Arthur McBride, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 27: Arie Sirotiak, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 28: Elaine Donovan, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 29: Evalee Mickey, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 30: Chuck Dusing, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 31: Shauna Zeck, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 32: Steven Paulsrud, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 33: Adel Kessler, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 34: Jeff Coughlin, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 35: Helene Donta, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 36: Joel Greer, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 37: Marian Riggs, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 38: Donna Jennings, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 39: Pendency Colman, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 40: Shelley McDowell, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 41: J Jay Gilchrist, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 42: Derek Gendvil, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 43: Maria Taylor, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 44: Craig Johnson, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 45: Jerry Uhlman, private citizen, Date Received: March 13, 2026, e-mail
COMMENTER 46: Lisa Ross Thedens, private citizen, Date Received: March 14, 2026, e-mail
COMMENTER 47: Renee Brockway, private citizen, Date Received: March 14, 2026, e-mail
COMMENTER 48: Tim Hammond, private citizen, Date Received: March 14, 2026, e-mail
COMMENTER 49: Shaun Ahern, private citizen, Date Received: March 14, 2026, e-mail
COMMENTER 50: Craig Clapper, private citizen, Date Received: March 14, 2026, e-mail
COMMENTER 51: Sydney Landstrom, private citizen, Date Received: March 14, 2026, e-mail
COMMENTER 52: Patricia Fuller, private citizen, Date Received: March 15, 2026, e-mail
COMMENTER 53: Ginger Kohoutek, private citizen, Date Received: March 15, 2026, e-mail
COMMENTER 54: Birgitta Meade, private citizen, Date Received: March 15, 2026, e-mail
COMMENTER 55: Raymond Thys, private citizen, Date Received: March 15, 2026, e-mail
COMMENTER 56: Sandra Holdt, private citizen, Date Received: March 16, 2026, e-mail
COMMENTER 57: Mary Maher, private citizen, Date Received: March 16, 2026, e-mail
COMMENTER 58: Craig Clapper, private citizen, Date Received: March 16, 2026, e-mail
COMMENTER 59: Veronica O'Hern, private citizen, Date Received: March 16, 2026, e-mail
COMMENTER 60: Holly Anderson, private citizen, Date Received: March 16, 2026, e-mail

COMMENTER 61: Gloria Foster, private citizen, Date Received: March 16, 2026, e-mail
COMMENTER 62: Donna Jennings, private citizen, Date Received: March 16, 2026, e-mail
COMMENTER 63: Staci Stanton, private citizen, Date Received: March 16, 2026, e-mail
COMMENTER 64: Timothy Kautza, private citizen, Date Received: March 16, 2026, e-mail
COMMENTER 65: Jocelyn Chateauvert, private citizen, Date Received: March 16, 2026, e-mail
COMMENTER 66: Jo Iverson, private citizen, Date Received: March 16, 2026, e-mail
COMMENTER 67: Maria Taylor, private citizen, Date Received: March 16, 2026, e-mail
COMMENTER 68: Tim Hammond, private citizen, Date Received: March 17, 2026, e-mail
COMMENTER 69: Jeffrey Anderson, private citizen, Date Received: March 17, 2026, e-mail
COMMENTER 70: Donna Jennings, private citizen, Date Received: March 18, 2026, e-mail
COMMENTER 71: Dan and Laura Gansen, private citizen, Date Received: March 18, 2026, e-mail
COMMENTER 72: Chad Streff, private citizen, Date Received: March 18, 2026, e-mail
COMMENTER 73: Stephanie Schneider, private citizen, Date Received: March 19, 2026, e-mail
COMMENTER 74: Damian Williams, private citizen, Date Received: March 19, 2026, e-mail
COMMENTER 75: Shaun Ahern, private citizen, Date Received: March 19, 2026, e-mail
COMMENTER 76: Jim Green, private citizen, Date Received: March 19, 2026, e-mail

The following email was received outside of the public notice period and the comments were identical to comments submitted on March 13, 2026 by James Martin-Schramm ([commenter 17](#)).

COMMENTER 77: Will Walling, private citizen, Date Received: March 21, 2026, e-mail

Commenters 78 thru 98 submitted comments similar to comments submitted on March 13, 2026 by James Martin-Schramm ([commenter 17](#)).

COMMENTER 78: Mel Pearson, private citizen
 Date Received: March 13, 2026, e-mail
 Comment:

Comments on the 2026 Impaired Waters Report
 1 message

Mel Pearson <pears.melissah@gmail.com>
 Reply-To: Mel Pearson <pears.melissah@gmail.com>
 To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Fri, Mar 13, 2026 at 1:11 PM

Dear IDNR IR Comments,

To: Iowa DNR

The draft 2026 list of impaired waters does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I strongly urge the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Thank you,

Sincerely,
 Mel Pearson
 1096 Guild Dr
 Fairfield, IA 52556

COMMENTS 79: Jay Howe, private citizen

Date Received: March 13, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report
1 message

Jay Howe <jehgfdia@gmail.com>
Reply-To: Jay Howe <jehgfdia@gmail.com>
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Fri, Mar 13, 2026 at 1:18 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am writing to comment on the draft 2026 list of impaired waters. I am concerned that the list does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I encourage the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

I recognize DNR professionals must contend with Iowa lawmakers who are beholden to big ag, Farm Bureau et al. Please do the best you can to furnish Iowans with objective information about the status of public domain waters, and ways in which they can be effectively monitored and remedial deployed.

Thank you,

Sincerely,
Jay Howe
PO Bx 86 513 SW 3rd St
Greenfield, IA 50849

COMMENTS 80: Prudy Klinger, private citizen

Date Received: March 13, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report
1 message

Prudy Klinger <prudyklinger@gmail.com>
Reply-To: Prudy Klinger <prudyklinger@gmail.com>
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Fri, Mar 13, 2026 at 1:18 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am writing to comment on the draft 2026 list of impaired waters. I have had cancer within the last 6 years. I also have 4 friends who have also had cancer in this time period, one who unfortunately passed away. I am concerned that the list does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

How long are we going to be content to be the state with the highest cancer rate in the nation?

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I encourage the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Thank you,
Prudy Klinger

Sincerely,
Prudy Klinger
1400 Maxhelen Blvd
Waterloo, IA 50701

COMMENTER 81: Marie DeVries, private citizen

Date Received: March 13, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report

1 message

Marie DeVries <marie.devries@gmail.com>
Reply-To: Marie DeVries <marie.devries@gmail.com>
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Fri, Mar 13, 2026 at 1:21 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am writing to comment on the draft 2026 list of impaired waters. I am concerned that the list does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

Our group in Mount Vernon has been testing local surface water for the past three years. We'll soon start year four! We know first hand the condition of Iowa water; it's not a pretty picture.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I encourage the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Thank you,
Marie DeVries

Sincerely,
Marie DeVries
213 10th Ave SW
Mount Vernon, IA 52314

COMMENTER 82: John Panning, private citizen

Date Received: March 13, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report
1 message

John Panning <johnpanning@gmail.com>
Reply-To: John Panning <johnpanning@gmail.com>
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Fri, Mar 13, 2026 at 1:26 PM

Dear IDNR IR Comments,

Dear Friend at the Iowa DNR,

I am writing to comment on the draft 2026 list of impaired waters. I'm a resident of Calhoun County who enjoys paddlesports, camping and swimming. I'm alarmed by the number of impaired waterways adjacent to recreation area that I and many others use, including Blackhawk Lake, North and South Twin Lakes, and the north fork of the Raccoon River.

I am concerned that the 2026 list does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR must assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I encourage the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Thank you,

Sincerely,
John Panning
219 S West St
[Lake City, IA 51449](#)

COMMENTS 83: Daniel Allerman, private citizen

Date Received: March 13, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report
1 message

Daniel Allerman <dballerman@gmail.com>
Reply-To: Daniel Allerman <dballerman@gmail.com>
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Fri, Mar 13, 2026 at 1:48 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

Thank you for taking the time to read my message. I was born in Iowa and have lived 41 years here, spending a lot of time making memories on Iowa's waterways. My friends and I spend a lot of time on the Raccoon River west of Des Moines (Redfield area) every summer, so I am concerned to see that river listed as an impaired waterway. I am more concerned that the impaired waters list does not reflect the risks to drinking water due to high nitrate concentrations, in the Raccoon and other major waterways across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, we need the DNR to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts. Our state's growing cancer rate is alarming, and we need your help to address it by helping to clean up our waterways.

I urge the DNR to reevaluate the available data to help Iowans stay informed about potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Thank you,

Sincerely,
Daniel Allerman
8076 Cobblestone Rd
[Urbandale, IA 50322](#)

COMMENTER 84: Hayli Cox Estep, private citizen

Date Received: March 13, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report
1 message

Hayli Cox Estep <haylimayli@gmail.com>
Reply-To: Hayli Cox Estep <haylimayli@gmail.com>
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Fri, Mar 13, 2026 at 2:09 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

As a newer Iowa resident and educator, I am writing to comment on the draft 2026 list of impaired waters. I am concerned that the list does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I encourage the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Thank you,

Hayli

Sincerely,
Hayli Cox Estep
1301 North President Avenue
Mason City, IA 50401

COMMENTER 85: Mary Ellen Miller, private citizen

Date Received: March 13, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report
1 message

Mary Ellen Miller <rosehaven1760@gmail.com>
Reply-To: Mary Ellen Miller <rosehaven1760@gmail.com>
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Fri, Mar 13, 2026 at 2:15 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am writing to comment on the draft 2026 list of impaired waters. I serve as an elected Soil and Water Conservation District Commissioner in Wayne County and am concerned that the list does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state.

High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I encourage the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Thank you,

Sincerely,
Mary Ellen Miller
1760 Ohio Road
Corydon, IA 50060

COMMENTER 86: Madeline Winther, private citizen

Date Received: March 13, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report

1 message

Madeline Winther <maddiewinther@gmail.com>
Reply-To: Madeline Winther <maddiewinther@gmail.com>
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Fri, Mar 13, 2026 at 2:41 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am writing to comment on the draft 2026 list of impaired waters. I am concerned that the list does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I strongly encourage the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

You do such a great job of taking care of Iowa! Make the Iowans proud and show us that you care about our health and safety. Protect our land and our water!

Thank you,

Sincerely,
Madeline Winther
646 S Dodge St
Iowa City, IA 52240

COMMENTER 87: Lizzy O'Loughlin, private citizen

Date Received: March 13, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report

1 message

Lizzy O'Loughlin <lizzy.oloughlin@gmail.com>
Reply-To: Lizzy O Loughlin <lizzy.oloughlin@gmail.com>
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Fri, Mar 13, 2026 at 3:20 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am writing to comment on the draft 2026 list of impaired waters. I have lived in Iowa my entire life. I would like to stay here, but my husband and I are expecting our first child and we will not stay somewhere where safe water is not a priority.

I am concerned that the list does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I encourage the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Thank you,

Sincerely,
Lizzy O'Loughlin
1253 Westland Ave
Waterloo, IA 50701

COMMENTER 88: Leo Salat, private citizen

Date Received: March 14, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report
1 message

Leo Salat <bill.cindysalat@gmail.com>
Reply-To: Leo Salat <bill.cindysalat@gmail.com>
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Sat, Mar 14, 2026 at 7:51 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am writing to comment on the draft 2026 list of impaired waters. I am concerned that the list does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I encourage the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Please insure that our water is not the cause of Iowa's high cancer rates
. Thank you Leo Salat

Sincerely,
Leo Salat
1250 Robinwood Ln NE
Cedar Rapids, IA 52402

COMMENTER 89: Chris Papousek, private citizen

Date Received: March 14, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report
1 message

Chris Papousek <cpapousek@gmail.com>
Reply-To: Chris Papousek <cpapousek@gmail.com>
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Sat, Mar 14, 2026 at 9:57 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am a homeowner on the shores of beautiful Clear Lake. Clear Lake is a crown jewel in the state and protecting it and other waters in Iowa is top of mind.

Therefore, I am writing to comment on the draft 2026 list of impaired waters. I am concerned that the list does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I encourage the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Thank you,

Sincerely,
Chris Papousek
1925 N Shore Dr
Clear Lake, IA 50428

COMMENTER 90: Debora Wiley, private citizen

Date Received: March 14, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report
1 message

Debora Wiley <debwiley@hotmail.com>
Reply-To: Debora Wiley <debwiley@hotmail.com>
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Sat, Mar 14, 2026 at 3:19 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I was shocked to see the draft 2026 list of Iowa's impaired waters, including Walnut Creek which runs right through the Des Moines metro where I live. I'm very concerned that the list does not reflect the risks to drinking water due to high nitrate concentrations. We already know that high nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

This list also should reflect the risks of toxic chemicals. The DNR MUST assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

Please reevaluate the data (and add more monitoring so we get better data) so Iowans can learn about the potential risks. We all want water to be drinkable, swimmable, and safe for our kids and our environment.

Thank you,

Deb Wiley
3900 John Lynde Rd
Des Moines, IA 50312

COMMENTER 91: Christopher Klostermann, private citizen

Date Received: March 16, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report
1 message

Christopher Klostermann <christopher.klostermann@gmail.com>
Reply-To: Christopher Klostermann <christopher.klostermann@gmail.com>
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Mon, Mar 16, 2026 at 10:01 AM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am writing to comment on the draft 2026 list of impaired waters. I am concerned that the list does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

As with many things involving bureaucracy, we often wait until it's too late to take action. By looking at the data preemptively, we can steer the ship to calmer, and cleaner, waters.

I encourage the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Thank you,

Sincerely,
Christopher Klostermann
109 19th Avenue Court
Hiawatha, IA 52233

COMMENTER 92: Paul Hayes, private citizen

Date Received: March 16, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report

1 message

Paul Hayes <pjakeh2003@gmail.com>

Mon, Mar 16, 2026 at 4:50 PM

Reply-To: Paul Hayes <pjakeh2003@gmail.com>

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

Dear IDNR IR Comments,

Dear Iowa DNR,

I am writing to comment on the draft 2026 list of impaired waters. I am concerned that the list does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I encourage the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

I am a two time cancer survivor who is a resident of the State of Iowa. I believe the water quality and the environment played a factor.

Thank you,
Paul Hayes
9133 Kemp Rd.
Dubuque, IA 52003-8920

COMMENTER 93: Brandon Griffis Griffis, private citizen

Date Received: March 19, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report

1 message

Brandon Griffis Griffis <gamble6x@hotmail.com>

Thu, Mar 19, 2026 at 8:55 AM

Reply-To: Brandon Griffis Griffis <gamble6x@hotmail.com>

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

Dear IDNR IR Comments,

Dear Iowa DNR,

Iowa is murdering its own citizens with cancer by allowing insane nitrate levels due to unregulated runoff. It must stop.

I am writing to comment on the draft 2026 list of impaired waters. I am concerned that the list does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I encourage the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Thank you,

Sincerely,
Brandon Griffis Griffis
1640 York St
Des Moines, IA 50316

COMMENTER 94: Laura Amsler, private citizen

Date Received: March 13, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report

1 message

Laura Amsler <amslercain@gmail.com>

Fri, Mar 13, 2026 at 7:42 PM

Reply-To: Laura Amsler <amslercain@gmail.com>

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

Dear IDNR IR Comments,

Dear Iowa DNR,

I am writing to comment on the draft 2026 list of impaired waters.

First, I live in Des Moines and am very concerned that all of the bodies of water around the Des Moines area are a level 5 impaired.

Further, I am concerned that the list does not even reflect the risks to drinking water due to HIGH NITRATE CONCENTRATIONS, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I encourage the DNR to REEVALUATE the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Thank you,

Laura Amsler

Sincerely,
Laura Amsler
1118 33rd St
Des Moines, IA 50311

COMMENTER 95: Sareena Madden, private citizen

Date Received: March 14, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report

1 message

Sareena Madden <sareenamadden@gmail.com>
Reply-To: Sareena Madden <sareenamadden@gmail.com>
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Sat, Mar 14, 2026 at 3:46 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I am writing to notify you of concerns about the proposed out door gun range Black flag arsenal is attempting to open in Madison county. Middle River runs through the proposed property. I understand that parts of the middle river already have high levels of nitrates. I fear what run off from the lead in ammo would do to the wildlife and quality of the water. This is an urgent matter as the zoning hear takes place Thursday the 19th.

In other concerns I am writing to comment on the draft 2026 list of impaired waters. I am concerned that the list does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I encourage the DNR to reevaluate the available data to better inform lowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Thank you,

Sincerely,
Sareena Madden
2707 220th Street
Winterset, IA 50273

COMMENTER 96: Leland Searles, private citizen

Date Received: March 15, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report

1 message

Leland Searles <leewardecology3@gmail.com>
Reply-To: Leland Searles <leewardecology3@gmail.com>
To: IDNR IR Comments <IRcomment@dnr.iowa.gov>

Sun, Mar 15, 2026 at 1:19 PM

Dear IDNR IR Comments,

Dear Iowa DNR,

I submit this comment on the draft 2026 list of impaired waters. Efforts to delist many streams run the risk of endangering people and wildlife who use our lakes and streams. Many simply are not able to enjoy the benefits Iowa has to offer because of impairments.

The list also needs to reflect the risks of toxic chemicals. In professional work, I became aware of the presence of "forever" chemicals (PFAS) in our waters. There are over 15,000 of these, most with unknown ecological and health effects.

I have primary contact with rivers and tributaries through my work in stream hydrology and restoration. In addition, I find time to hike and take in the biodiversity our state has, including the life in and near our surface waters.

My position is that the DNR must use all valid means to collect and evaluate water quality data for nutrients, bacteria, toxins, and sediment to better inform Iowans of actual and potential risks. Iowa's waters need to be drinkable, swimmable, and safe for our health and the future of our precious ecosystems.

Thank you,

Leland M. Searles

Sincerely,
Leland Searles
422 S 3rd St
Milo, IA 50166

COMMENTER 97: Todd Mattison, private citizen

Date Received: March 15, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report

1 message

Todd Mattison <todd.mattison@gmail.com>

Sun, Mar 15, 2026 at 2:25 PM

Reply-To: Todd Mattison <todd.mattison@gmail.com>

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

Dear IDNR IR Comments,

Dear Iowa DNR,

I am writing to comment on the draft 2026 list of impaired waters. I am an avid canoeist and fly fisherman, and hiker. I frequent our state parks. I also began using my own nitrate water quality test strips from a kit I received from the Izaak Walton League of America. I tested both the Raccoon River south of Adel near I-80 and the Des Moines River tested at #20 in June 2025 and downtown Des Moines in July at #18. The are posted on the national map. Both results are well over the acceptable level to drink of 10PPM. Also, the lakes I prefer to swim and paddle in were polluted - again. Particular to me are Pine Lake near Eldora and Backbone State Park near Strawberry Point. Yes, I travel that far to recreate some times. Both were closed to swimming most of the summer due to very high e-coli levels. But viewing the impaired waters map on your website confirms it is a state-wide problem, not isolated to any specific river, lake, or watershed. The water monitoring funds that were cut **MUST BE ADDED BACK TO THE BUDGET** at a minimum to better track the problem. Further still, other remedies that work with farmers to use sustainable, truly effective practices must be included. due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all data to assess which waters do not always meet the safe drinking water standard.

There are other chemicals, some pesticides or herbicides or others, that are in the water and should be tested. You already have done the sampling, so it is just more lab work. They need to be carefully analyzed.

I ask that the DNR reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Thank you, Todd Mattison

Iowan who loves being outdoors in our parks and forests

Sincerely,

Todd Mattison

418 6th Ave.

Des Moines, IA 50309

COMMENTER 98: Jane Busch, private citizen

Date Received: March 16, 2026, e-mail

Comment:

Comments on the 2026 Impaired Waters Report

1 message

Jane Busch <buschj84@gmail.com>

Mon, Mar 16, 2026 at 9:10 AM

Reply-To: Jane Busch <buschj84@gmail.com>

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

Dear IDNR IR Comments,

Dear Iowa DNR,

I am writing to comment on the draft 2026 list of impaired waters.

As an educator of young children, the current nitrate levels of surface water are of concern to me. Children need to be outdoors. They love playing in water that runs through creeks. If the water is unsafe, which it currently is, simply splashing water from fun play can lead to intestinal illnesses in young children due to the toxins(Nitrates) in the water. Please help the future generations play safely in our natural resources by putting higher control standards for clean water in Iowa.

I am concerned that the list does not reflect the risks to drinking water due to high nitrate concentrations, including in major rivers across the state. High nitrate levels are a statewide problem. The DNR should use all available data to assess which waters do not always meet the safe drinking water standard.

The list also needs to reflect the risks of toxic chemicals. Because Iowa has not yet adopted numeric standards, the DNR needs to assess whether these chemicals violate the prohibition against harmful chemicals in toxic amounts.

I encourage the DNR to reevaluate the available data to better inform Iowans of potential risks and to help make Iowa's waters drinkable, swimmable, and safe for our health and our environment.

Thank you,
Jane Busch, Educator

Sincerely,
Jane Busch
3468 Co Rd W40
Decorah, IA 52101

COMMENTER 99: Leann Wells Huber, private citizen

Date Received: March 17, 2026, e-mail

Comment:

Public Comment - 2026 draft Iowa Impaired Waters list
1 message

Leann Wells Huber <Leann.WellsHuber@messages.fwwatch.org>
Reply-To: Leann Wells Huber <leanngh@hotmail.com>
To: IRcomment@dnr.iowa.gov

Tue, Mar 17, 2026 at 4:00 PM

Dear Iowa Department of Natural Resources,

I urge the Iowa Department of Natural Resources to revise its impaired waters list to fully and accurately reflect the serious threat of nitrate pollution in Iowa's waterways. DNR must relist the seven waters that EPA added to Iowa's 2024 impaired waters list.

Dangerous nitrate contamination — largely driven by fertilizer runoff and waste from industrial agriculture — is affecting rivers that supply drinking water to hundreds of thousands of Iowans.

State law requires the DNR to protect the public from cancer risks linked to water pollution, and these pollutants have been linked to cancer and birth defects. Iowa is already facing one of the highest and fastest-rising cancer rates in the country.

Despite clear evidence that nitrate levels in key rivers exceed safe thresholds, the current draft list fails to include these waters as impaired. By excluding nitrate-impaired rivers, DNR is effectively denying the need for stronger protections and delaying meaningful action to address a growing public health crisis.

Just last year, nitrate levels in central Iowa rivers spiked so high that drinking water utilities were forced to run costly treatment systems for extended periods to ensure water was safe for consumption.

I urge DNR to:

- Update its methods to account for long-term health risks associated with nitrates
- Accurately list all waterways impaired by nitrate pollution
- Prioritize development of protection plans for nitrate-impaired waters

Iowans deserve clean, safe drinking water, free of dangerous cancer-causing pollutants. The DNR needs to revise its impaired waters list to fully and accurately reflect the serious threat of nitrate pollution in Iowa's waterways, including relisting the seven waters that EPA added to Iowa's 2024 impaired waters list.

Sincerely,
Leann Wells Huber
2576 E Tiffin Ave
Des Moines, IA

Commenters 100 thru 172 submitted comments identical to comments submitted on March 17, 2026 by Leann Wells Huber ([commenter 99](#)).

COMMENTER 100: Linda Quinn, private citizen, Date Received: March 17, 2026, e-mail

COMMENTER 101: Jody Gibson, private citizen, Date Received: March 17, 2026, e-mail

COMMENTER 102: Stacey Zuckerman, private citizen, Date Received: March 17, 2026, e-mail

COMMENTER 103: Kathy Graeve, private citizen, Date Received: March 17, 2026, e-mail

COMMENTER 104: Rachel Rovine, private citizen, Date Received: March 17, 2026, e-mail

COMMENTER 105: Gabi Glover, private citizen, Date Received: March 17, 2026, e-mail

COMMENTER 106: Jenny Held, private citizen, Date Received: March 17, 2026, e-mail

COMMENTER 107: Gregory Clancy, private citizen, Date Received: March 17, 2026, e-mail

COMMENTER 108: Melissa Pearson, private citizen, Date Received: March 17, 2026, e-mail

COMMENTER 109: Carlene Russell, private citizen, Date Received: March 17, 2026, e-mail

COMMENTER 110: Charlene Ferguson, private citizen, Date Received: March 17, 2026, e-mail

COMMENTER 111: Kay Pence, private citizen, Date Received: March 17, 2026, e-mail

COMMENTER 112: Dixie Nihsen, private citizen, Date Received: March 17, 2026, e-mail

COMMENTS 113: Dawn Ask Martin, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 114: Cindy Borske, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 115: Kathy Butler, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 116: Robert Butler, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 117: Terry Moore-Guzman, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 118: Nancy Sellers, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 119: Terry Lowman, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 120: Elaine Donovan, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 121: Dr Ann Valentine, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 122: Michel Murphy, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 123: Phil Berthelsen, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 124: Donna Jennings, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 125: Mary Anson, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 126: Virginia Swift, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 127: Mary Johnson, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 128: Catherine Kaplan, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 129: Susan White, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 130: Lucy Hansen, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 131: Connie Johnson, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 132: Conrad Wilkinson, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 133: Judith Ertz, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 134: Craig Clapper, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 135: Cecilia Fogarty, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 136: Jerry Denhartog, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 137: Jo Ann Kovar, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 138: Alexander Honigsblum, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 139: Emily Johnson, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 140: Chris Busselberg, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 141: Larissa Boeck, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 142: Brandt Amlie, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 143: Beth Drewelow, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 144: Nancy Scholten, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 145: Sue Biederman, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 146: Melody Smith, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 147: Carla Wilson, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 148: Jessica Heiden, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 149: Peter Rose, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 150: Patricia Sheller, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 151: Michelle Sillman, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 152: Michelle Benes, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 153: Todd Southworth, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 154: Evalee Mickey, private citizen, Date Received: March 17, 2026, e-mail
COMMENTS 155: Ernest Steward, private citizen, Date Received: March 18, 2026, e-mail
COMMENTS 156: Judy Cohen, private citizen, Date Received: March 18, 2026, e-mail
COMMENTS 157: Linda Bearbower, private citizen, Date Received: March 18, 2026, e-mail
COMMENTS 158: Sophie Freudenberg, private citizen, Date Received: March 18, 2026, e-mail
COMMENTS 159: Connie Johnson, private citizen, Date Received: March 18, 2026, e-mail

COMMENTS 160: Mindy Kruckenberg, private citizen, Date Received: March 18, 2026, e-mail
COMMENTS 161: Carmen Minor, private citizen, Date Received: March 18, 2026, e-mail
COMMENTS 162: William Romaine, private citizen, Date Received: March 18, 2026, e-mail
COMMENTS 163: Chris Cotant, private citizen, Date Received: March 18, 2026, e-mail
COMMENTS 164: Lesley Goodyk, private citizen, Date Received: March 18, 2026, e-mail
COMMENTS 165: Laura Garro, private citizen, Date Received: March 18, 2026, e-mail
COMMENTS 166: Linda Myatt, private citizen, Date Received: March 18, 2026, e-mail
COMMENTS 167: Kathleen Brown, private citizen, Date Received: March 18, 2026, e-mail
COMMENTS 168: Stephen Tews, private citizen, Date Received: March 18, 2026, e-mail
COMMENTS 169: Martin Monroe, private citizen, Date Received: March 18, 2026, e-mail
COMMENTS 170: Daniel Rosmann, private citizen, Date Received: March 18, 2026, e-mail
COMMENTS 171: Jane Schockemoehl, private citizen, Date Received: March 18, 2026, e-mail
COMMENTS 172: Diane Cook, private citizen, Date Received: March 18, 2026, e-mail

The following comments were received outside of the public notice period and the comments were identical to comments submitted on March 17, 2026 by Leann Wells Huber ([commenter 99](#)).

COMMENTS 173: James Brown, private citizen, Date Received: March 20, 2026, e-mail
COMMENTS 174: Jessica Melkus, private citizen, Date Received: March 20, 2026, e-mail
COMMENTS 175: Irene Mclain, private citizen, Date Received: March 22, 2026, e-mail

Commenters 176 thru 180 submitted comments similar to comments submitted on March 17, 2026 by Leann Wells Huber ([commenter 99](#)).

COMMENTS 176: Eloise Gardner, private citizen

Date Received: March 17, 2026, e-mail

Comment:

Public Comment - 2026 draft Iowa Impaired Waters list

1 message

Eloise Gardner <Eloise.Gardner@messages.fwwatch.org>

Tue, Mar 17, 2026 at 4:18 PM

Reply-To: Eloise Gardner <aebearhugs@aol.com>

To: IRcomment@dnr.iowa.gov

Dear Iowa Department of Natural Resources,

I urge the Iowa Department of Natural Resources to revise its impaired waters list to fully and accurately reflect the serious threat of nitrate pollution in Iowa's waterways. DNR must relist the seven waters that EPA added to Iowa's 2024 impaired waters list.

Dangerous nitrate contamination — largely driven by fertilizer runoff and waste from industrial agriculture — is affecting rivers that supply drinking water to hundreds of thousands of Iowans.

State law requires the DNR to protect the public from cancer risks linked to water pollution, and these pollutants have been linked to cancer and birth defects. Iowa is already facing one of the highest and fastest-rising cancer rates in the country.

Despite clear evidence that nitrate levels in key rivers exceed safe thresholds, the current draft list fails to include these waters as impaired. By excluding nitrate-impaired rivers, DNR is effectively denying the need for stronger protections and delaying meaningful action to address a growing public health crisis.

Just last year, nitrate levels in central Iowa rivers spiked so high that drinking water utilities were forced to run costly treatment systems for extended periods to ensure water was safe for consumption.

I urge DNR to:

- Update its methods to account for long-term health risks associated with nitrates
- Accurately list all waterways impaired by nitrate pollution
- Prioritize development of protection plans for nitrate-impaired waters

Even though I and my family have lived in the DM Metro area for almost 40 years, I have been concerned about the drinking water and have ordered my water through Crystal Clear for years. I also stopped taking my children to play in the lakes and rivers due to concern for their health safety. It is so sad we must have such concerns, but I believe our water in Iowa is sick for us all. If I could afford it, I would filter the water coming into our home, but unfortunately cannot afford to do so. I did try drinking just filtered water, but I went thru filters much faster than most others in my family did who live in other parts of the country. It wasn't always this way in Iowa, but sadly is now. And the DNR should care about it and be a part of getting the problem/s cleaned up at the root of it with changing what the farmers put on their fields and crops. The products used in today's farming practices are poisoning us! The pesticide, seed and fertilizer companies should be part of helping us get cleaner soil and water. Please care about this!!

Iowans deserve clean, safe drinking water, free of dangerous cancer-causing pollutants. The DNR needs to revise its impaired waters list to fully and accurately reflect the serious threat of nitrate pollution in Iowa's waterways, including relisting the seven waters that EPA added to Iowa's 2024 impaired waters list.

Sincerely,
Eloise Gardner
2505 Country Side Pl
West Des Moines, IA

COMMENTS 177: Jesse Heiar, private citizen

Date Received: March 17, 2026, e-mail

Comment:

Public Comment - 2026 draft Iowa Impaired Waters list

1 message

Jesse Heiar <Jesse.Heiar@messages.fwwatch.org>

Tue, Mar 17, 2026 at 4:24 PM

Reply-To: Jesse Heiar <jesselh122@gmail.com>

To: IRcomment@dnr.iowa.gov

Dear Iowa Department of Natural Resources,

I urge the Iowa Department of Natural Resources to revise its impaired waters list to fully and accurately reflect the serious threat of nitrate pollution in Iowa's waterways. DNR must relist the seven waters that EPA added to Iowa's 2024 impaired waters list.

Dangerous nitrate contamination — largely driven by fertilizer runoff and waste from industrial agriculture — is affecting rivers that supply drinking water to hundreds of thousands of Iowans.

State law requires the DNR to protect the public from cancer risks linked to water pollution, and these pollutants have been linked to cancer and birth defects. Iowa is already facing one of the highest and fastest-rising cancer rates in the country.

Despite clear evidence that nitrate levels in key rivers exceed safe thresholds, the current draft list fails to include these waters as impaired. By excluding nitrate-impaired rivers, DNR is effectively denying the need for stronger protections and delaying meaningful action to address a growing public health crisis.

Just last year, nitrate levels in central Iowa rivers spiked so high that drinking water utilities were forced to run costly treatment systems for extended periods to ensure water was safe for consumption.

I urge DNR to:

- Update its methods to account for long-term health risks associated with nitrates
- Accurately list all waterways impaired by nitrate pollution
- Prioritize development of protection plans for nitrate-impaired waters

Federal data and environmental reports indicate that Iowa ranks among the highest in the U.S. for agricultural chemical application. Iowa farmers apply nearly 54 million pounds of pesticides and over 11 billion pounds of nitrogen fertilizer annually, often exceeding other states. These intensive applications are linked to significant water contamination and rising cancer rates in the state. ; Pesticide/Fertilizer Use: Iowa leads in the application of weed killers (35–54 million pounds) and commercial fertilizers (11.6 billion pounds) to its massive corn and soybean acreage.

Contamination: These applications lead to high nitrate pollution in waterways, with 92% of nitrogen and 80% of phosphates in Iowa's waters coming from farms and feedlots.

Health Concerns: The extensive use of herbicides, such as glyphosate, acetochlor, and atrazine, is under investigation for contributing to high cancer rates in the state, including non-Hodgkin lymphoma and leukemia.

Livestock Waste: Iowa holds more factory farms than any other state, producing 109 billion pounds of manure annually, which adds to the nutrient pollution... ; Chemical companies are getting away with murder and the system pretends that they have no idea what is causing this!!!

Iowans deserve clean, safe drinking water, free of dangerous cancer-causing pollutants. The DNC needs to revise its impaired waters list to fully and accurately reflect the serious threat of nitrate pollution in Iowa's waterways, including relisting the seven waters that EPA added to Iowa's 2024 impaired waters list.

Sincerely,
Jesse Heiar
820 Wilson
Dubuque, IA

COMMENTS 178: Roxanne Jackson, private citizen

Date Received: March 17, 2026, e-mail

Comment:

Public Comment - 2026 draft Iowa Impaired Waters list

1 message

Roxanne Jackson <Roxanne.Jackson@messages.fwwatch.org>

Tue, Mar 17, 2026 at 4:32 PM

Reply-To: Roxanne Jackson <rocky1949@wctatel.net>

To: IRcomment@dnr.iowa.gov

Dear Iowa Department of Natural Resources,

I had my water tested last year by the county, the arsenic level was high, and the manganese was high. I am a retired senior citizen on a fixed income; I had a new well dug in 2012--not a cost I can do again. The state of Iowa needs to protect the water quality in Iowa-- We cannot live here without access to good water!

I urge the Iowa Department of Natural Resources to revise its impaired waters list to fully and accurately reflect the serious threat of nitrate pollution in Iowa's waterways. DNR must relist the seven waters that EPA added to Iowa's 2024 impaired waters list.

Dangerous nitrate contamination — largely driven by fertilizer runoff and waste from industrial agriculture — is affecting rivers that supply drinking water to hundreds of thousands of Iowans.

State law requires the DNR to protect the public from cancer risks linked to water pollution, and these pollutants have been linked to cancer and birth defects. Iowa is already facing one of the highest and fastest-rising cancer rates in the country.

Despite clear evidence that nitrate levels in key rivers exceed safe thresholds, the current draft list fails to include these waters as impaired. By excluding nitrate-impaired rivers, DNR is effectively denying the need for stronger protections and delaying meaningful action to address a growing public health crisis.

Just last year, nitrate levels in central Iowa rivers spiked so high that drinking water utilities were forced to run costly treatment systems for extended periods to ensure water was safe for consumption.

I urge DNR to:

- Update its methods to account for long-term health risks associated with nitrates
- Accurately list all waterways impaired by nitrate pollution
- Prioritize development of protection plans for nitrate-impaired waters

Iowans deserve clean, safe drinking water, free of dangerous cancer-causing pollutants. The DNR needs to revise its impaired waters list to fully and accurately reflect the serious threat of nitrate pollution in Iowa's waterways, including relisting the seven waters that EPA added to Iowa's 2024 impaired waters list.

Sincerely,
Roxanne Jackson
3622 Wheelerwood Rd
Hanlontown, IA

COMMENTER 179: Helene Sicard-Cowan, private citizen

Date Received: March 17, 2026, e-mail

Comment:

Public Comment - 2026 draft Iowa Impaired Waters list

1 message

Helene Sicard-Cowan <Helene.SicardCowan@messages.fwwatch.org>

Tue, Mar 17, 2026 at 4:42 PM

Reply-To: Helene Sicard-Cowan <hlncs@yahoo.fr>

To: IRcomment@dnr.iowa.gov

Dear Iowa Department of Natural Resources,

Enough is enough.

I urge the Iowa Department of Natural Resources to revise its impaired waters list to fully and accurately reflect the serious threat of nitrate pollution in Iowa's waterways. DNR must relist the seven waters that EPA added to Iowa's 2024 impaired waters list.

Dangerous nitrate contamination — largely driven by fertilizer runoff and waste from industrial agriculture — is affecting rivers that supply drinking water to hundreds of thousands of Iowans.

State law requires the DNR to protect the public from cancer risks linked to water pollution, and these pollutants have been linked to cancer and birth defects. Iowa is already facing one of the highest and fastest-rising cancer rates in the country.

Despite clear evidence that nitrate levels in key rivers exceed safe thresholds, the current draft list fails to include these waters as impaired. By excluding nitrate-impaired rivers, DNR is effectively denying the need for stronger protections and delaying meaningful action to address a growing public health crisis.

Just last year, nitrate levels in central Iowa rivers spiked so high that drinking water utilities were forced to run costly treatment systems for extended periods to ensure water was safe for consumption.

I urge DNR to:

- Update its methods to account for long-term health risks associated with nitrates
- Accurately list all waterways impaired by nitrate pollution
- Prioritize development of protection plans for nitrate-impaired waters

Iowans deserve clean, safe drinking water, free of dangerous cancer-causing pollutants. The DNR needs to revise its impaired waters list to fully and accurately reflect the serious threat of nitrate pollution in Iowa's waterways, including relisting the seven waters that EPA added to Iowa's 2024 impaired waters list.

Sincerely,
Helene Sicard-Cowan
331 S Summit St
Iowa City, IA

COMMENTER 180: J Jay Gilchrist, private citizen

Date Received: March 17, 2026, e-mail

Comment:

Public Comment - 2026 draft Iowa Impaired Waters list

1 message

J Jay Gilchrist <J.JayGilchrist@messages.fwwatch.org>

Tue, Mar 17, 2026 at 7:56 PM

Reply-To: J Jay Gilchrist <jaygilchrist@gmail.com>

To: IRcomment@dnr.iowa.gov

Dear Iowa Department of Natural Resources,

I urge the Iowa Department of Natural Resources to revise its impaired waters list to fully and accurately reflect the serious threat of nitrate pollution in Iowa's waterways. DNR must relist the seven waters that EPA added to Iowa's 2024 impaired waters list.

Dangerous nitrate contamination — largely driven by fertilizer runoff and waste from industrial agriculture — is affecting rivers that supply drinking water to hundreds of thousands of Iowans.

State law requires the DNR to protect the public from cancer risks linked to water pollution, and these pollutants have been linked to cancer and birth defects. Iowa is already facing one of the highest and fastest-rising cancer rates in the country.

Despite clear evidence that nitrate levels in key rivers exceed safe thresholds, the current draft list fails to include these waters as impaired. By excluding nitrate-impaired rivers, DNR is effectively denying the need for stronger protections and delaying meaningful action to address a growing public health crisis.

Just last year, nitrate levels in central Iowa rivers spiked so high that drinking water utilities were forced to run costly treatment systems for extended periods to ensure water was safe for consumption.

I urge DNR to:

- Update its methods to account for long-term health risks associated with nitrates
- Accurately list all waterways impaired by nitrate pollution
- Prioritize development of protection plans for nitrate-impaired waters

People's lives are at risk, our communities will benefit all the way around with cleaner streams, not to mention the community of all creatures that depends on how we treat our waters.

Iowans deserve clean, safe drinking water, free of dangerous cancer-causing pollutants. The DNR needs to revise its impaired waters list to fully and accurately reflect the serious threat of nitrate pollution in Iowa's waterways, including relisting the seven waters that EPA added to Iowa's 2024 impaired waters list.

Sincerely,
J Jay Gilchrist
1116 Swisher St
Iowa City, IA

COMMENTER 181: Michael R. Schmidt, General Counsel, Iowa Environmental Council

Date Received: March 19, 2026, e-mail

Comment:

Comments on draft 2026 impaired waters list

1 message

Michael Schmidt <schmidt@iaenvironment.org>
To: "IRcomment@dnr.iowa.gov" <IRcomment@dnr.iowa.gov>
Cc: Colleen Fowle <fowle@iaenvironment.org>

Thu, Mar 19, 2026 at 3:51 PM

Dear Water Quality Monitoring and Assessment Section:

I am attaching comments on behalf of several organizations regarding the draft 2026 impaired waters list under section 303(d) of the Clean Water Act. I have also attached several exhibits referenced in the comments. Please confirm that you received the comments and attachments. If you have any questions, please do not hesitate to contact me.

Sincerely,

Michael Schmidt



Michael R. Schmidt (he/him) | General Counsel
515-244-1194 x 212 | schmidt@iaenvironment.org
Iowa Environmental Council
505 Fifth Avenue Suite 850
Des Moines IA 50309
iaenvironment.org

7 attachments

-  2026-03-19_Joint comments - 2026 303d draft list.pdf
896K
-  Exhibit A.pdf
1231K
-  Exhibit B.pdf
11626K
-  Exhibit C.pdf
5386K
-  Exhibit D.pdf
477K
-  Exhibit E.pdf
355K
-  Exhibit F.pdf
229K



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

March 19, 2026

Iowa Department of Natural Resources
Attn: IR Comments
Water Quality Monitoring & Assessment Section
6200 Park Ave, Suite 200
Des Moines, IA 50321
Email: IRcomment@dnr.iowa.gov

RE: Draft 2026 Impaired Waters List and Integrated Report

Dear Water Quality Monitoring and Assessment Section:

The Iowa Environmental Council (IEC), Drake Environmental Action League, Environmental Law & Policy Center (ELPC), Food & Water Watch, Iowa Alliance for Responsible Agriculture, Iowa Citizens for Community Improvement, Jefferson County Farmers and Neighbors, Nishnabotna Water Defenders, and Trout Unlimited North Bear Chapter offer the following comments on the 2026 draft list of the Section 303(d) impaired waters and integrated report released by the Iowa Department of Natural Resources (IDNR).

We are concerned that the 2026 draft list relies on an improper methodology to assess impairments, excludes credible data from its analysis, does not include all violations of narrative water quality standards, and will not lead to timely development of total maximum daily loads. In combination, these issues will limit public understanding of pollution in the state and delay or avoid restoration of polluted waters.

We encourage IDNR to remedy these problems before submission of the list to U.S. EPA by the federal deadline of April 1, 2026.¹

I. BACKGROUND

The draft 2026 impaired waters list and integrated report reflect the continuing challenge to restore water quality in Iowa. Flat or declining funding from the legislature has limited IDNR's ability to adopt water quality standards, monitor waters across the state, develop cleanup plans,

¹ 40 C.F.R. § 130.7(d).

and implement actions to address pollution. As a result, Iowans lack opportunities to recreate, face challenges with drinking water systems, and are kept in the dark about the risks that result from water pollution.

A large proportion of assessed waters remain impaired. The 2026 303(d) list shows that 50.9% of assessed rivers and streams, as well as 63.8% of lakes and reservoirs, are impaired for one or more designated uses.² Only 26% of assessed waters support at least one of their designated uses and **less than 1.6% of assessed waters support all assessed uses.** While IDNR has proposed 83 impairments for delisting, it is unclear if all of those impairments have actually been improved or if the short-term nature of the data considered by IDNR failed to capture all seasonal variation.

The impairments have a direct effect on Iowans' ability to use the water. Of Iowa's waters that have been assessed for A1 recreational use, 88% (588 of 668) are impaired. Public lands and waters are owned by the people of Iowa under the care of the state. Iowans are not getting the full benefits of the state's primary recreational waters due to poor water quality. The state has done an inadequate job of protecting public lands and waters for public recreational use. IDNR should prioritize TMDL completion for Iowa's recreational waters and improve Iowa's recreational water quality for the benefit of Iowans.

II. INTERESTS OF COMMENTERS

The Iowa Environmental Council is an alliance of nearly 100 organizations, at-large board members from business, farming, the sciences and education, and over 500 individual members. IEC works to build a just, healthy environment and sustainable future for all Iowans. Our members care about water quality across the state, and they fish, recreate, and drink water sourced from surface and groundwater sources.

Drake Environmental Action League is a committed group of students involved in increasing awareness and sustainability on Drake's campus, into the community and beyond. Some of what we do: grassroots work for national organizations, sponsoring great speakers, protests, working with administration, environmental conferences, state environmental politics, improving recycling programs and a member group of Iowa Students Towards Environmental Protection.

Environmental Law and Policy Center is a Midwest-based not-for-profit public interest environmental advocacy organization dedicated to improving environmental quality and public health, including protecting the Great Lakes and other Midwest natural resources. For nearly 30 years, ELPC has used litigation, policy advocacy, and strategic communications to improve environmental quality and protect the Midwest's natural resources. ELPC is headquartered in Chicago, Illinois and has additional offices in Ohio, Iowa, Wisconsin, and Washington, D.C.

² IDNR, "2026 305(b) Assessment Summary DRAFT," available at <https://programs.iowadnr.gov/adbnr/Assessments/Summary/2026> (last accessed Mar. 11, 2026).

Food & Water Watch (FWW) is a national, nonprofit membership organization that mobilizes regular people to build political power to move bold and uncompromised solutions to the most pressing food, water, and climate problems of our time. FWW works to protect people's health, communities, and democracy from the growing destructive power of the most powerful economic interests.

Jefferson County Farmers and Neighbors has worked since 2005 to protect Jefferson County – and Iowa – from factory farms. JFAN is a 501(c)(3) community organization of rural and town residents that works to protect Jefferson County and Iowa from factory farms, of rural and town residents and traditional family farmers. Our common concern is to stop the growth of infringing factory farms in Jefferson County and Protect our Quality of Life.

The Iowa Alliance for Responsible Agriculture (IARA) is a diverse coalition of national, state, and local organizations and individuals who are concerned about the harmful impacts of factory farms and are each working to promote traditional and ethical agriculture in Iowa. The Iowa Alliance for Responsible Agriculture seeks to educate Iowans about the destructive impacts of industrial livestock production, advocate for a statewide factory farm moratorium, and promote traditional and humane livestock production.

Since 1975, Iowa Citizens for Community Improvement has organized to build the power of everyday people in Iowa's rural towns and big cities. Iowa CCI members create change through grassroots organizing, educating, and mobilizing on issues that impact our communities the most. Together, we work to put people and planet first by stopping factory farms, ending racist policing and anti-immigrant legislation, and winning bold action on climate change, healthcare, and clean water for everyone.

The Nishnabotna Water Defenders are a group of citizens in Southwest Iowa concerned about one thing: keeping our water clean. The organization focuses on organizing, advocating, and educating with respect to improving water quality, not just locally, but in the state of Iowa. The group is meant to show how important our rivers and streams are to our way of living.

Members of Trout Unlimited Iowa North Bear Chapter work to protect and restore waters in the Iowa, including numerous trout streams in Iowa threatened by water pollution. Trout Unlimited is a nationwide organization that brings together diverse interests to care for and recover rivers and streams so our children can experience the joy of wild and native trout and salmon.

III. DNR METHODOLOGY MUST REFLECT SCIENCE AND THE LAW.

The draft 2026 list and integrated report rely on a methodology that considers a short window of time that may fail to capture seasonal variation. In addition, the scale of monitoring may not capture current water quality conditions or trends.

A. IDNR must treat the nitrate criterion for drinking water use as acute.

The nitrate water quality standard is derived from a maximum contaminant level (MCL) adopted under the Safe Drinking Water Act (SDWA). The SDWA standard MCL is an acute criterion, not a chronic human health criterion.

The nitrate MCL protects against short-term exposure to infants, not long-term chronic effects.³ EPA's website for MCLs notes that the nitrate MCL is intended to prevent infants from becoming "seriously ill" with possibility of death if untreated.⁴ In addition, "Symptoms include shortness of breath and blue-baby syndrome."⁵ These are not chronic, long-term health effects. EPA specifically identified the potentially toxic effects in the Water Quality Standards Handbook: "MCLs of the SDWA, where they exist, control toxic chemicals in finished drinking water."⁶

From a practical standpoint, when a drinking water source is above the MCL water quality standard, drinking water suppliers face real threats to providing drinking water that meets the SDWA requirements. Drinking water providers have designed systems that reasonably rely on Class C drinking water sources meeting the MCL. The typical drinking water treatment process does not remove the nitrates and nitrites, so nitrates above the MCL are not normally removed through the treatment process.

Des Moines Water Works illustrates this challenge. Even with the largest nitrate removal system in the country, nitrate levels above the MCL in the Des Moines and Raccoon River led to the first ever lawn watering ban in central Iowa.⁷ Treatment facilities simply could not keep up with water demand.

The history of Iowa's nitrate criterion supports treating it as acute. In 2001, IDNR updated its Class C Criteria rule to replace "acute" with "MCL" for nitrate as N.⁸ IDNR relied on EPA's WQS Handbook as a key reference to support its updated standards. EPA distinguished between MCLs and human health criteria in its approval of IDNR's drinking water criteria.⁹ MCLs were used when there was not a chronic human health criterion already established.¹⁰ IDNR explicitly

³ See "National Primary Drinking Water Regulations," U.S. EPA (last accessed March 10, 2026), available at <https://www.epa.gov/ground-water-and-drinking-water/national-primary-drinking-water-regulations>.

⁴ "National Primary Drinking Water Regulations," U.S. EPA (last accessed March 10, 2026), available at <https://www.epa.gov/ground-water-and-drinking-water/national-primary-drinking-water-regulations>.

⁵ *Id.*

⁶ EPA WQS Handbook (1994) at 3-12.

⁷ Central Iowa Water Works, "Lawn Watering Banned Immediately" (June 13, 2025), available at https://www.dmww.com/news_detail_T37_R440.php

⁸ Iowa DNR, "1999 Triennial Review: Iowa's Water Quality Standards ISSUE PAPER – Class C Criteria & Its Implementation," at 11 (2001 IDNR Rulemaking Package at 84).

⁹ 2002 Letter at 13.

¹⁰ *Id.*

wrote “MCL” into the 2001 submission (not “chronic”) and thereby incorporated the MCL standard as the water quality standard. That is what EPA approved.

EPA partially disapproved IDNR’s draft 2024 impaired waters list because IDNR treated nitrate as a conventional pollutant, rather than a non-conventional pollutant.¹¹ EPA noted the toxic effects of nitrate at high concentrations.¹² IDNR criticized the lack of formal “toxic” listing for nitrate as evidence that EPA was misinterpreting the standard.¹³ But the lack of formal listing does not undermine the acute nature of nitrate’s effects. EPA has not updated its lists of toxic parameters since 1982.¹⁴ Typical drinking water treatment does not remove nitrate; EPA has identified ion exchange, reverse osmosis, or electrodialysis as treatment options.¹⁵ Only 20 percent of Iowans have a water supplier that has the capability to remove nitrate using one of these methods.¹⁶ Even without being listed as toxic, overlooking the acute consequences of high nitrate creates inconsistency with SDWA requirements that apply on a single-sample basis to public water suppliers.

IDNR instead wants to treat nitrate as a conventional pollutant. IDNR determines nitrate impairments using a 10% binomial exceedance statistical approach that is appropriate for conventional pollutants. But nitrate is not listed as a conventional pollutant.¹⁷ Because nitrate is not listed as a conventional pollutant or toxic pollutant, IDNR must apply the approach that protects the designated use.¹⁸ Applying the approach for conventional pollutants to nitrate does not protect the designated use for Class C waters, which must be protected as raw water sources of potable water supply, because drinking water becomes unsafe any time nitrate concentrations exceed the MCL. Therefore, IDNR must list Class C waters as impaired for nitrate pollution based on acute exposure risk.

The documents that provided a basis for the nitrate criterion do not define the methodology for impaired waters listing; IDNR’s methodology for impairment was not part of the water quality standard package that EPA reviewed and approved. IDNR stated in its water quality standard

¹¹ Jeffrey Robichaud, U.S. EPA, “Decision Document: Iowa’s Clean Water Act Section 303(d) List of Water Quality Limited Segments Still Requiring TMDLs” (Nov. 12, 2024) at 13-14 (Exhibit A).

¹² *Id.* at 13; see also “EPA Response to Comments on Partial Disapproval of Iowa’s 2024 Section 303(d) List,” Dec. 30, 2024, at 7 (Exhibit B).

¹³ Letter from Kayla Lyon (IDNR) to Jeff Robichaud (EPA), Dec. 19, 2024 (Exhibit C). EPA later met with Iowa Farm Bureau and then rescinded the partial disapproval to further evaluate the data. See Exhibit E, Exhibit F.

¹⁴ 40 C.F.R. § 401.15 (Feb. 4, 1981); 40 C.F.R. pt. 423, Appx A (Nov. 19, 1982).

¹⁵ U.S. EPA, “Addressing Nitrate in Drinking Water with the Drinking Water State Revolving Fund,” May 2021, available at https://www.epa.gov/sites/default/files/2021-06/documents/addressing_nitrates_with_the_dwsrf-final.pdf (describing funding for additional nitrate treatment for drinking water sources).

¹⁶ IEC analysis of IDNR Public Water Supply data (available at <https://programs.iowadnr.gov/iowadrinkingwater/Report/PwsFacilities>).

¹⁷ 40 C.F.R. § 401.16.

¹⁸ IOWA ADMIN. CODE r. 567-61.3“b” (“Designated use waters are to be protected for all uses of general use segments in addition to the specific uses assigned.”); see also IOWA ADMIN. CODE r. 567-61.2(2)“a” (“Existing surface water uses and the level of water quality necessary to protect the existing uses will be maintained and protected.”).

submission to EPA that “the use of the criterion by other Department activities, such as the development of 303d listings, 305b assessment, etc., must consider the basis of the numerical criteria and merge that with their own program guidance and procedures.”¹⁹ Despite that, IDNR stated that in implementing wasteload allocations for permit limits, “Any Class C value would be treated as a chronic-type of criteria.”²⁰ In practice, however, IDNR has recognized the toxic nature of nitrate – it relied on EPA’s *Technical Support Document for Water Quality-Based Toxics Control* to derive effluent limits.²¹

Finally, even if the numeric criterion were interpreted as chronic, Iowa has a narrative water quality standard that prohibits toxic pollutants in toxic amounts for Class C waters:²²

All substances toxic or detrimental to humans or detrimental to treatment process shall be limited to nontoxic or nondetrimental concentrations in the surface water.

Because blue baby syndrome is an acute effect, not chronic, nitrate must stay below the 10 mg/L level to meet the narrative standard.

Ultimately, treating nitrate as a conventional pollutant for Class C waters implies to the public that the waters are clean enough for drinking water uses even if there is increased risk that finished drinking water will not meet the MCL. Drinking water is a constant, year-round, and essential use for all Iowans. Lack of a suitable drinking water source creates immediate and serious problems. Drinking water issues across the state, from western Iowa²³ to the waters proposed for addition to the list by the 2024 EPA disapproval, demonstrate the necessity for further action to address pollution in drinking water sources.

B. Relying on only three years of data to assess all impairments is not rational or practical.

IDNR relies on three years of data to conduct its impairment assessments.²⁴ The department has not justified this approach. When a waterway does not show signs of an impairment during one three-year period, it does not mean that the waterway has necessarily improved or the

¹⁹ IDNR, “Public Participation Responsiveness Summary” (Aug. 30, 2000), at 4 (2001 IDNR Rulemaking Package at 42).

²⁰ Iowa DNR, “1999 Triennial Review: Iowa’s Water Quality Standards ISSUE PAPER – Class C Criteria & Its Implementation,” at 3 (2001 IDNR Rulemaking Package at 76).

²¹ Tom Atkinson (IDNR), “Deriving total nitrogen limits from the WLA in the Cedar River TMDL,” Nov. 20, 2008.

²² IOWA ADMIN. CODE r. 567-61.3“c”(2); *see also* 40 C.F.R. § 130.7(b)(3) (defining applicable water quality standards for identifying water quality-limited segments to include “numeric criteria, narrative criteria, waterbody uses, and antidegradation requirements”).

²³ Ethan Hewitt, “Boil advisory for city of Clarinda, Southwest Regional Water customers lifted,” KMAland (Sept. 22, 2025), available at https://www.kmaland.com/news/boil-advisory-for-city-of-clarinda-southwest-regional-water-customers-lifted/article_77fd104b-7e1e-4bcd-abd0-e9e8c560e838.html (last visited Oct. 2, 2025) (identifying turbidity and algae leading to drinking water advisory in Clarinda, Iowa).

²⁴ IDNR, “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” (“2026 Methodology”) (Feb. 17, 2026) at 13.

impairment has been addressed. As we have seen in recent years, short-term weather patterns can seriously impact 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 a three-year period 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 TMDL development and causing confusion for watershed groups that are trying to make improvements and install pollution reduction practices. IDNR should review at least five years of data to account for climatic variation while reflecting current ambient water quality.²⁵

C. The state should adopt a watershed-based monitoring program.

IDNR relies on data from several sources, including several groups of data collected by IDNR itself.²⁶ We urge IDNR to develop a standardized monitoring plan using the watershed approach that is scientifically rigorous, allows interpretation of results, and is useful to the public. If the state had a common monitoring plan that used a watershed approach to collect data and assess water quality, the impaired waters list would be a much more useful tool for actually understanding the state's water quality and progress toward meeting water quality standards. Such a plan might resemble Minnesota's watershed lake and stream monitoring program, which fully assesses watersheds on a 10-year cycle.

A more rigorous monitoring system would require more resources. IDNR has requested and received a flat budget for water quality monitoring since fiscal year 2005.²⁷ This amount has 40% less value than it did in 2005.²⁸

IV. IDNR MUST LIST ADDITIONAL WATERS FOR NITRATE.

Iowa law requires IDNR to consider "credible data" in conducting assessments.²⁹ To qualify as credible, data must "originate from studies and samples collected by the department, a professional designee of the department, or a qualified volunteer."³⁰ Professional designees include "governmental agencies other than the department."³¹

²⁵ 2026 Methodology at 14 (*citing* EPA, 1997. Guidelines for Preparation of the Comprehensive State Water Quality Assessments (305(b) reports) and Electronic Updates. Assessment and Watershed Protection Division, Office of Wetlands, Oceans, and Watersheds, Office of Water, U.S. Environmental Protection Agency, Washington, D.C. EPA841-B-97-002A.).

²⁶ 2026 Methodology at 12.

²⁷ Legislative Services Agency, "Summary of FY 2005 Budget and Department Requests" (Dec. 2003) at A-39, available at <https://www.legis.iowa.gov/docs/publications/LADR/402918.pdf>.

²⁸ U.S. Bureau of Labor Statistics, "CPI Inflation Calculator," available at https://www.bls.gov/data/inflation_calculator.htm (last accessed Mar. 9, 2026).

²⁹ IOWA CODE § 455B.194.

³⁰ IOWA CODE § 455B.193.

³¹ *Id.*

IDNR relies primarily on its own monthly ambient grab sampling for nitrate data. In response to IDNR's proposed 2024 draft impaired waters list, EPA found that IDNR had "not assembled and evaluated all readily available data."³²

In response to the 2024 draft impaired waters list, U.S. EPA reviewed additional data that IDNR had not considered in its assessment.³³ Among the data sources EPA considered was monitoring by IIHR-Hydrosience and Engineering at the University of Iowa.³⁴ IIHR operates a network of real-time sensors across the state for a range of water quality parameters and provides the data in an online portal.³⁵

IIHR is housed within the University of Iowa, which is authorized by state law and funded, in part, by the legislature.³⁶ IIHR's monitoring approach has provided far more detailed data on water quality than monthly grab sampling can supply. The website IIHR maintains includes data from the U.S. Geological Survey, a government entity. IDNR should treat data from the Iowa Water Quality Information System as data from a professional designee.

IIHR calibrates its sensors each year to ensure accuracy. Recent data from IIHR demonstrates that the data it collects aligns well with IDNR samples. Figure 1 shows the degree of correlation between IDNR sampling and the closest IIHR sample taken at the same time. **The correlation (R^2) in 2024 was greater than 0.96.**

³² U.S. EPA, "Decision Document: Iowa's Clean Water Act Section 303(d) List of Water Quality Limited Segments Still Requiring TMDLs" (Nov. 12, 2024) at 11 (Exhibit A).

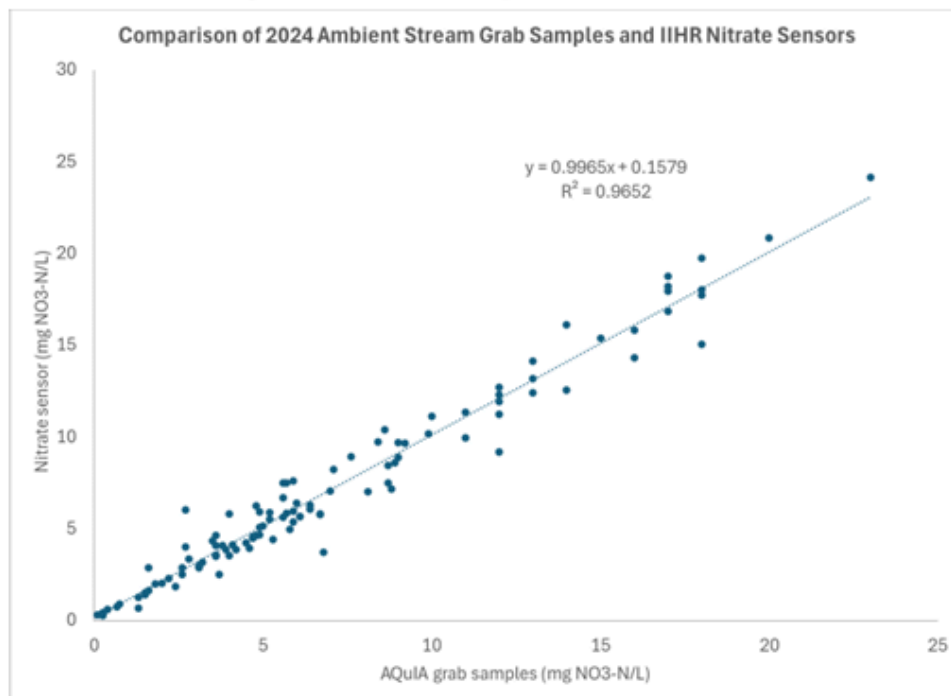
³³ *Id.*

³⁴ *Id.*

³⁵ IIHR, Iowa Water Quality Information System, available at <https://iwqis.iowawis.org/app/> (last accessed Mar. 9, 2026).

³⁶ IOWA CODE ch. 262, 263.

Figure 1. IDNR/IIHR Sample Correlation in 2024.



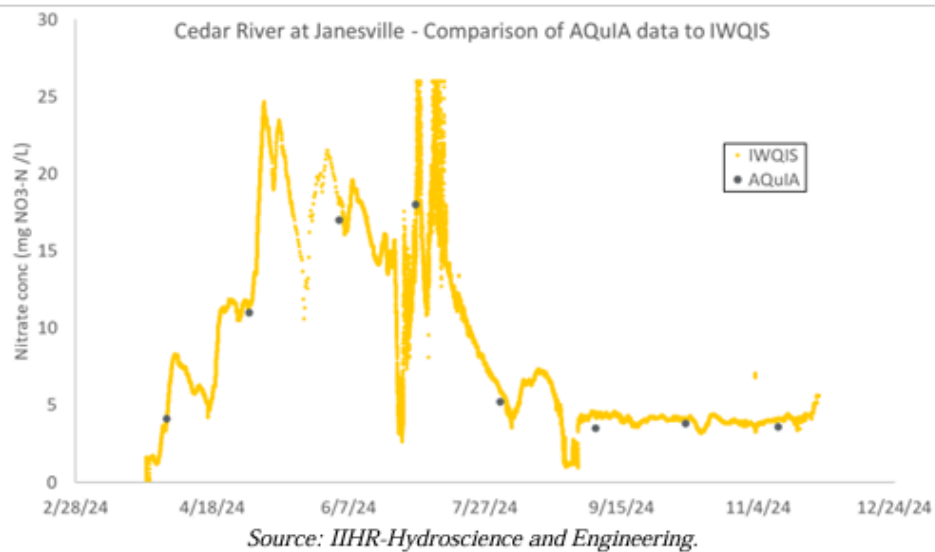
Source: IIHR-Hydrosience and Engineering.

While a monthly sample provides some degree of insight into water quality conditions, it can miss significant variation. IDNR has relied for years on linear interpolation between samples to assess nitrate concentrations and loads.³⁷ For the 2026 draft list, IDNR relies on a binomial calculation to estimate the frequency of exceeding the water quality criterion when limited sampling data are available.³⁸ Figure 2 demonstrates the importance of more frequent water quality sampling to capture variability between monthly samples.

³⁷ Iowa State University, IDNR, and Iowa Department of Agriculture and Land Stewardship, "Iowa Nutrient Reduction Strategy 2018-19 Annual Progress Report" (June 2020) at 35-36, available at <https://shop.iastate.edu/extension/farm-environment/natural-resources-and-environment/water-quality/inrc17.html>.

³⁸ 2026 Methodology at 20.

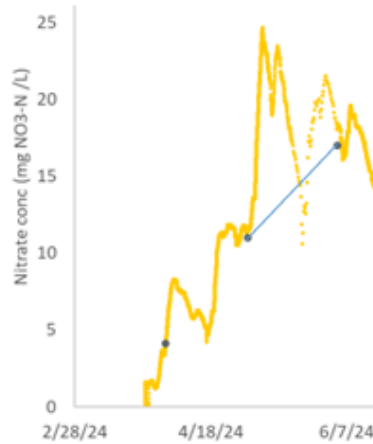
Figure 2. Relationship of IIHR (IWQIS) and IDNR (AQuIA) Nitrate Samples in Cedar River at Janesville.



As shown in Figure 2, concentrations of nitrate in IDNR samples closely align with the 15-minute increment monitoring conducted by IIHR. However, the IDNR sampling never captured the peaks of samples above 20 mg/L nitrate revealed by IIHR monitoring.

More significantly, the IIHR data demonstrate the problem with linear interpolation between monthly samples. As shown in Figure 3, the nitrate was regularly higher than a linear interpolation would suggest between the second and third DNR samples.

Figure 3. Linear Interpolation vs. Monitoring Data.



Source: IIHR-Hydrosience and Engineering.

Drinking water operators cannot rely on monthly samples for determining how to manage their facilities. They need more frequent monitoring to produce accurate data, make informed decisions, and ensure compliance with the SDWA.

Capturing the peaks between monthly samples is especially important when nitrate rises at unexpected times. On January 6, 2026, Des Moines Water Works had to turn on its nitrate removal facility due to high nitrate concentrations in its source waters (the Des Moines and Raccoon Rivers).³⁹ It was the first time in more than ten years that the facility operated in January.⁴⁰

Data from IIHR suggest that additional waters should be listed as impaired due to high concentrations of nitrate. For example, as shown in Figure 4 the Des Moines River in the area of Ottumwa (identified by IDNR as segment 1011) had daily average nitrate-nitrogen concentrations above 10 mg/L for 50 days in 2024. The daily average concentration peaked at 13.93 mg/L. The City of Ottumwa drinking water treatment facility draws intake water from this river segment and does not have a nitrate removal system. Instead, it relies on mixing the river water with lower-nitrate water to maintain compliance with the 10 mg/L nitrate MCL.

³⁹ Rachel Cramer, "Uncommonly high nitrate levels this month lead Des Moines water treatment plant to run removal system," Iowa Public Radio (Jan. 12, 2026), available at <https://www.iowapublicradio.org/environment/2026-01-12/nitrates-central-iowa-water-works-water-quality>.

⁴⁰ *Id.*

Figure 4. Nitrate-Nitrogen at IIHR Site WQS0115 (Des Moines River segment 1011).



Source: IIHR-Hydrosience and Engineering.

Long peaks of high nitrate can create risk of exceeding the 10 mg/L nitrate-nitrogen MCL. In 2024, the Des Moines River at Ottumwa exceeded 10 mg/L nitrate-nitrogen for 48 days in a 55-day period.

In other cases, IIHR data show that rivers may exceed the 10 mg/L nitrate-nitrogen MCL regularly for shorter durations. IIHR has a monitoring station on the Skunk River (WQS0010), downstream of the Class C segment of the Skunk River (segment 892, formerly segment IA 03-SKU-0030_1). The IIHR monitoring data show the daily average nitrate-nitrogen in the Skunk River rose above 10 mg/L on 14 separate occasions in the 2022-24 timeframe, for a total of 93 days, but it is not on the draft impaired waters list.

IDNR needs to evaluate all available data using a method that better reflects the short-term risks of nitrate-nitrogen exceeding 10 mg/L. It is unlikely that DNR's binomial calculations accurately reflect the frequency of exceedances measured by the IIHR monitoring. We recommend IDNR work with IIHR to incorporate the additional monitoring data in assessing water quality.

V. THE DRAFT 2026 IMPAIRED WATERS LIST FAILS TO INCLUDE WATERS VIOLATING NARRATIVE CRITERIA BECAUSE DNR HAS NOT ADOPTED EPA-RECOMMENDED WATER QUALITY CRITERIA.

Iowa has not yet adopted water quality criteria for numerous pollutants recommended by EPA.⁴¹ The delay in adopting new criteria limits Iowans' ability to understand the risks to designated uses. IDNR should apply EPA's scientific conclusions to the state's narrative criteria without further delay.

A. IDNR should list waters as impaired for recreation due to microcystin violating the narrative water quality standard.

EPA issued recommendations in 2019 for microcystin to protect recreational users from harmful algal blooms.⁴² EPA evaluated studies of the health effects resulting from exposure to microcystin to determine its recommended criterion.⁴³ Microcystin is produced by cyanobacteria, which are also known as blue-green algae. Microcystin can cause rashes, hives, abdominal pain, headache, sore throat, vomiting and nausea, dry cough, diarrhea, blistering around the mouth, pneumonia, and, at high levels, liver damage.⁴⁴ Microcystin has also caused liver toxicity in lab testing.⁴⁵ Exposure to microcystin in drinking water can cause liver damage in humans and animals, which can be fatal.⁴⁶

EPA's recommendation document reviews the outcomes of numerous studies, including short-term exposure to water containing microcystin, and concludes that the safe threshold is 8 µg/L.⁴⁷ This threshold is calculated to prevent liver and kidney toxicity.⁴⁸ EPA identified case studies in which exposure to microcystin was believed to result in severe liver impacts.⁴⁹ In fact, the EPA's criteria recommendations relied heavily on Iowa water quality data. EPA identified an instance

⁴¹ See IEC et al., "Comments on IDNR's 2025 Triennial Review of Water Quality Standards" (Oct. 15, 2025), available at <https://www.iaenvironment.org/webres/File/Joint%20Environmental%20Comments%20on%202025%20Triennial%20Review.pdf>.

⁴² *Recommended Human Health Recreational Ambient Water Quality Criteria or Swimming Advisories for Microcystins and Cylindrospermopsin*, U.S. EPA (May 2019);

⁴³ See *id.*

⁴⁴ See *id.* at 64-68; Iowa Department of Public Health, "Microcystin," available at <https://hhs.iowa.gov/health-prevention/providers-professionals/center-acute-disease-epidemiology/epi-manual/environmental-disease/microcystin> (last accessed Oct. 10, 2025); "Health Effects from Cyanotoxins," U.S. EPA (July 10, 2025), available at <https://www.epa.gov/habs/what-are-effects-habs>.

⁴⁵ *Recommended Human Health Recreational Ambient Water Quality Criteria or Swimming Advisories for Microcystins and Cylindrospermopsin*, U.S. EPA (May 2019) at 59.

⁴⁶ Iowa Department of Public Health, *Harmful Algal Blooms*, at <https://idph.iowa.gov/ehs/algal-blooms>.

⁴⁷ *Recommended Human Health Recreational Ambient Water Quality Criteria or Swimming Advisories for Microcystins and Cylindrospermopsin*, U.S. EPA (May 2019) at 59-61, 64-68 (describing studies).

⁴⁸ *Id.* at 49 (identifying kidney and liver damage as endpoints of the conceptual model for criteria development).

⁴⁹ *Id.* at 66 (describing case studies, including liver failure in a small child).

where recreation in water with concentrations almost exactly at the threshold used in Iowa resulted in harmful health effects.⁵⁰

When IDNR released the 2020, 2022, and 2024 impaired waters lists, IEC called on the state to adopt microcystin and numeric nutrient criteria. IDNR 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. IDNR left those priorities out of the 2021-2023 Triennial Review and has not published one since..

In the absence of numeric criteria, IDNR must assess microcystin using the narrative water quality standard. Given the serious health outcomes from exposure to microcystin, its presence demonstrates that waters high in microcystin do not meet the narrative water quality standard for aquatic recreation.

Iowa has adopted several narrative criteria that apply to toxic microcystin, which result from excess nutrients from agriculture or wastewater:⁵¹

- b. Such waters shall be free from floating debris, oil, grease, scum and other floating materials attributable to wastewater discharges or agricultural practices in amounts sufficient to create a nuisance.
- c. Such waters shall be free from materials attributable to wastewater discharges or agricultural practices producing objectionable color, odor or other aesthetically objectionable conditions.
- d. Such waters shall be free from substances attributable to wastewater discharges or agricultural practices in concentrations or combinations which are acutely toxic to human, animal, or plant life.

In the 2022-24 timeframe, IDNR issued 48 beach advisories for microcystin at 16 lakes (see Table 1). Four of those lakes (Brushy Creek Lake Beach, McIntosh Woods Beach, Crandall's Beach, and Marble Beach) are not listed as impaired for aquatic recreation due to algae or turbidity (which can be caused by algae). Two of the lakes had at least four swimming advisories but are not proposed for listing in this cycle. The other two beaches had one swimming advisory without being listed.

⁵⁰ Recommended Human Health Recreational Ambient Water Quality Criteria or Swimming Advisories for Microcystins and Cylindrospermopsin, U.S. EPA (May 2019) at 67 (identifying reported symptoms of abdominal cramps, diarrhea, nausea vomiting, fever, headache, rash, eye irritation, ear ache, neurologic symptoms, tingling, confusion, and respiratory symptoms).

⁵¹ IOWA ADMIN. CODE r. 567-61.3(2).

Table 1. Lakes with Microcystin Advisories.

Beach Name (Lake if different)	2022	2023	2024	Total	Nutrient-related Listing
Brushy Creek Lake Beach		10		10	—
McIntosh Woods Beach (Clear Lake)	2		2	4	—
Crandall's Beach (Spirit Lake)	1			1	—
Marble Beach (Spirit Lake)	1			1	—
Lake Darling Beach	2	8	8	18	Turbidity narrative (Class 4)
Green Valley Lake Beach	2	1		3	Algae narrative (Class 4)
Geode Lake Beach	2			2	Turbidity narrative (Class 5)
Big Creek Lake Beach			1	1	Algae narrative (Class 5)
George Wyth Beach	1			1	Algae narrative (Class 5)
Lake Ahquabi Beach			1	1	Turbidity narrative (Class 5)
Lake Anita Beach			1	1	Algae narrative (Class 4)
Lower Pine Lake Beach		1		1	Algae narrative (Class 4)
North Twin Lake East Beach		1		1	Algae narrative (Class 4)
North Twin Lake West Beach	1			1	Algae narrative (Class 4)
Rock Creek Lake Beach			1	1	Algae narrative (Class 4)
Union Grove Lake Beach			1	1	Algae narrative (Class 4)
Total	12	21	15	48	

Based on violation of the narrative criteria, we recommend IDNR add the four lakes (Brushy Creek Lake Beach, McIntosh Woods Beach, Crandall's Beach, and Marble Beach) that have had microcystin advisories at their swimming beaches to the impaired waters list.

B. IDNR should list waters as impaired for drinking water uses due to microcystin violating the narrative water quality standard.

Iowa has a narrative standard to protect drinking water from “All substances toxic or detrimental to humans or detrimental to treatment process” such that those substances are “limited to nontoxic or nondetrimental concentrations in the surface water.”⁵² Microcystin can violate this standard by creating risks to human health.

Excess nutrient pollution that results in cyanobacteria blooms and their associated toxins (i.e., microcystin) poses a significant public health threat in waters designated for drinking water use. Dangerous cyanobacterial toxins can pass through standard treatment practices for drinking water.⁵³ EPA issued a recommended microcystin health advisory for young children of 0.3 µg/L,⁵⁴ which is less than five percent of the recommended criterion for recreational exposure. Thus, to

⁵² IOWA ADMIN. CODE r. 567-61.3(3)“c”(2).

⁵³ *Recommended Human Health Recreational Ambient Water Quality Criteria or Swimming Advisories for Microcystins and Cylindrospermopsin*, U.S. EPA (May 2019) at 108 (describing studies).

⁵⁴ *Drinking Water Health Advisory for the Cyanobacterial Microcystin Toxins*, U.S. EPA (June 2015) at 2.

meet the drinking water standard, water treatment facilities would need to remove more than 95 percent of microcystin even when a water meets the recreational standard.

The growing problem of harmful algal blooms extends beyond Iowa's lakes. For example, in 2020 and 2021, Des Moines Water Works detected microcystin produced by cyanobacteria in the Raccoon River.⁵⁵ The City of North Liberty posted a warning sign at a creek near a public park after residents observed green scum on the surface, which was confirmed to be toxic algae.⁵⁶

IDNR has taken the position that the recreational standard is not the appropriate standard to protect drinking water, arguing that the recreational standard was based on incidental ingestion of raw water and drinking water suppliers may filter out toxins. IDNR specifically noted that water treatment providers may adjust operations to remove cyanotoxins. IDNR's position seems to assume that all treatment providers have constant knowledge of cyanotoxin concentrations and have the means in place to adjust treatment operations.

However, EPA has found that achieving the drinking water health advisory level of 0.3 µg/L may require greater treatment efforts than operators would typically use for pathogens and depends on a variety of factors.⁵⁷ Generally, treatment for microcystin is a complex process:

Any variation in treatment methods aimed at reducing toxins concentrations need to be tailored to the type(s) of cyanobacteria present and the site-specific water quality (e.g. pH, temperature, turbidity, presence of natural organic material (NOM), etc.), the treatment processes already in place, and the utility's multiple treatment goals (e.g., turbidity and total organic carbon (TOC) removal, disinfection requirements, control of disinfection by-products (DBP) formation, etc.). Utilities need to have an understanding of the type and concentration of cyanotoxins present in the source water and should conduct site-specific evaluations such as jar testings and piloting in order to determine the most effective treatment strategy.⁵⁸

Standard treatment is problematic because it cannot effectively remove microcystin that has been released from cyanobacterial cells into the surrounding water:

⁵⁵ Des Moines Water Works, "NEWS RELEASE: Des Moines Water Works Lifts Water Restrictions; Microcystin Potential Continues Need for Wise Water Use Practices," (July 2021), available at https://www.dmwv.com/news_detail_T37_R238.php (last accessed Oct. 10, 2025).

⁵⁶ City of North Liberty. Press release. *Blue-green algae identified in Beaver Creek; migrating to Muddy Creek* (July 28, 2017), available at <http://northlibertyiowa.org/2017/07/28/blue-green-algae-identified-in-beaver-creek-migrating-to-muddy-creek/>.

⁵⁷ *Recommendations for Public Water Systems to Manage Cyanotoxins in Drinking Water*, U.S. EPA (2015) at 17-22, available at <https://www.epa.gov/sites/production/files/2017-06/documents/cyanotoxin-management-drinking-water.pdf> (concluding that "CT values required for oxidizing microcystin-LR (and by assumption, total microcystins) may be higher than those required for inactivation of *Giardia* cysts, depending on pH, temperature and initial concentration of microcystins.").

⁵⁸ *Drinking Water Health Advisory for the Cyanobacterial Microcystin Toxins*, U.S. EPA (June 2015) at 42.

Conventional treatment is generally considered to have limited effectiveness for the removal of the extracellular microcystins. Therefore, additional processes such as adsorption, chemical oxidation, biodegradation or reverse osmosis, and nanofiltration are required to remove extracellular microcystins.⁵⁹

The fact that microcystin has been detected in finished drinking water of cities like Toledo does not appear to support IDNR's assumption that treatment will consistently remove the toxin.

IDNR more recently stated that it "is continuing to evaluate the recommended criteria to decide on further future action on the subject."⁶⁰ Despite EPA making recommendations more than five years ago, and an implementation document in 2023, IDNR has not taken public steps to adopt a microcystin standard. To date, it has listed a limited number of lakes for microcystin, but no rivers.

IDNR's AQuIA database contains zero samples in streams for microcystin for the 2022-24 time range,⁶¹ nor does it contain the microcystin samples collected by Des Moines Water Works referenced above. IDNR should request and evaluate data for microcystin in Class C waters, based on samples from treatment providers or other data sources. IDNR should then list any waters that have microcystin exceeding the 0.3 µg/L health advisory level recommended by EPA.

C. IDNR should list additional waters as impaired if they fail to meet the narrative standard for human health.

Iowa has the second-highest cancer rate in the country and is one of two states where the rate is increasing. Polling conducted by Food & Water Action in 2026 revealed that Iowans are more concerned about rising cancer rates than they are about cost of living increases.⁶² We are concerned that environmental factors, including water quality, play a role in those alarming statistics. Iowans are very concerned about water quality and industrial pollution contributing to chronic health effects such as cancer, as identified in a survey conducted through cancer listening sessions held by IEC, the Harkin Institute at Drake University, and the Iowa Farmers Union, and across Iowa in 2025.⁶³ Nearly half the participants in Food & Water Action's polling said their own household had been affected by water quality issues over the past five years. As a state, we should not sacrifice Iowans' health for the benefit of industrial polluters.

⁵⁹ *Id.* at 43.

⁶⁰ IDNR, "Iowa 2024 Section 303(d) list: Responsiveness Summary" (May 3, 2024) at 18.

⁶¹ IDNR, AQuIA Database, available at <https://programs.iowadnr.gov/aquia/search/Results/4NY%3d> (last accessed Mar. 9, 2026).

⁶² Global Strategy Group, "New poll reveals strong cross-party support for clean water protections, industrial agriculture regulations" (Feb. 2026), available at https://www.foodandwateraction.org/wp-content/uploads/2026/02/FWA-Iowa-Polling-Memo_2.26.pdf.

⁶³ IEC compiled results of surveys at listening sessions around the state asking about levels of concern for environmental risk factors for cancer. The results will be incorporated into a forthcoming report.

EPA adopts human health criteria for a range of industrial, agricultural, and other pollutants after a lengthy scientific review process. The scientific review ensures that the recommendations are tied to human health outcomes that have been well established by scientific studies. EPA's supporting documentation provides adequate basis to justify adoption of its standards unless IDNR has state-specific information to justify a different approach.

It is shocking that IDNR has not yet adopted the majority of EPA human health criteria, which EPA sets to protect against chronic health problems like cancer. As shown in Table 2, the updated EPA criteria address dozens of pollutants by setting new or more stringent criteria. The criteria apply to fish tissue or a combination of fish tissue and ambient water concentrations. EPA's updates reflect newer science that IDNR has not incorporated into the state's standards.

Table 2. Human Health Criteria Comparison.

EPA Criteria	Water + organism	Organism only
New	54	56
More stringent	26	24
Less stringent	14	14
Same	0	0
Total	94	94

EPA's online listing of human health criteria includes 125 pollutants.⁶⁴ Iowa's rule listing water quality criteria protecting human health contains fewer than half of these, not all of which are the same as the criteria set by EPA, as shown in Appendix A of our comments on the 2025 Triennial Review.⁶⁵ In some cases, IDNR has criteria for variants of the chemicals, or for families of chemicals but not individual ones. Still, based on analysis by IDNR, the state needs to make substantial updates to the human health criteria.

The discrepancies between EPA's human health criteria and Iowa criteria result from IDNR not updating the state's human health criteria since the 2002 update to EPA's recommended human health criteria. Even before EPA's update in 2015, Iowa lacked criteria for numerous pollutants for which EPA set criteria.⁶⁶ The state water quality standards are more than two decades old and a decade overdue for updates.

⁶⁴ "National Recommended Water Quality Criteria - Human Health Criteria Table," U.S. EPA (Dec. 19, 2024), available at <https://www.epa.gov/wqc/national-recommended-water-quality-criteria-human-health-criteria-table> (last visited Oct. 7, 2025).

⁶⁵ See IOWA ADMIN. CODE r. 567-61.3(3) at Table 1; see IEC et al., "Comments on IDNR's 2025 Triennial Review of Water Quality Standards" (Oct. 15, 2025), available at <https://www.iaenvironment.org/webres/File/Joint%20Environmental%20Comments%20on%202025%20Triennial%20Review.pdf>.

⁶⁶ "Analysis of the Numeric Water Quality Criteria Adopted by the Ten States That Border Directly on the Mississippi River: Iowa," Environmental Law Institute (Nov. 2009) at 25, available at <https://www.eli.org/sites/default/files/eli-pubs/d18-21-ia.pdf> (identifying that Iowa had not adopted fish and water

In the absence of numeric criteria, IDNR must implement the narrative standard to protect human health: "Waters which are designated as Class HH shall contain no substances in concentrations which will make fish or shellfish inedible due to undesirable tastes or cause a hazard to humans after consumption."⁶⁷

IDNR should evaluate fish tissue in waters across the state to determine whether they exceed the criteria recommended by EPA. If they do, IDNR should evaluate whether the waters should be listed based on the narrative standard for human health.

VI. DNR SHOULD PRIORITIZE TMDL DEVELOPMENT AND IMPLEMENTATION OF HIGH-VALUE WATERS.

In addition to impaired waters requiring a TMDL, the integrated report IDNR submits to EPA must include the status of other waters. The continuing impairment of Outstanding Iowa Waters (OIWs) continues to limit recreational and other water uses across the state.

Iowa's Outstanding Waters are natural treasures that the state has identified as high quality waters of state significance. Many of these waters face threats to their quality that may restrict recreation, limiting Iowans' options considering the breadth of impairments across the state.

Commensurate with the specialty antidegradation tier, IDNR should prioritize OIWs for development of TMDLs to protect their special status as waters of significance. IDNR's TMDL Prioritization Methodology does not include a parameter for status as an OIW.⁶⁸ OIWs are classified based on water quality standards, so IDNR should urgently address any violation of a water quality standard. Outstanding National Resource Waters, designated as Tier 3 under the state's antidegradation procedure, should also receive special status for TMDL development in the future if such a water is designated.

In addition, many of the state's premier recreational lakes continue to be impaired due to indicator bacteria. Many of the lakes that have TMDLs have been impaired for over a decade, and some have even had a TMDL for over a decade. The state must commit more attention and resources to creating lasting improvements in water quality that restore these lakes to compliance with water quality standards. We urge IDNR to complete TMDLs for all state park beaches that lack them and to dedicate adequate resources to implementing water quality improvement plans, with the ultimate goal of demonstrating measurable improvement and achieving delisting only after sustained progress across multiple assessment cycles.

criteria for 60 of 113 pollutants, and had not adopted water supply criteria for 53 of 84 toxic pollutants with primary drinking water standards).

⁶⁷ IOWA ADMIN. CODE r. 567-61.3 "d".

⁶⁸ 2026 Methodology at 53.

VII. CONCLUSION

Thank you for the opportunity to comment on the draft 2026 impaired waters list. If you have questions or we can clarify these comments further, please feel free to call.

Sincerely,

/s/ Michael Schmidt

Michael Schmidt
General Counsel
Iowa Environmental Council

/s/ Colleen Fowle

Colleen Fowle
Water Program Director
Iowa Environmental Council

/s/ Josh Mandelbaum

Josh Mandelbaum
Senior Attorney
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/s/ Terry Langan

/s/ Jodi Reese
Terry Langan
Jodi Reese
Nishnabotna Water Defenders

/s/ Allie Raines

Allie Raines
President
Drake Environmental Action League

/s/ Diane Rosenberg

Diane Rosenberg
Executive Director
Jefferson County Farmers and Neighbors

/s/ Diane Rosenberg

Diane Rosenberg
Iowa Alliance for Responsible Agriculture

/s/ Jay Leach

Jay Leach
President
Iowa Trout Unlimited North Bear Chapter

Exhibits:

- A. EPA Partial Disapproval of Iowa's 2024 Section 303(d) List
- B. EPA Response to Comments on Partial Disapproval of Iowa's 2024 Section 303(d) List
- C. IDNR Comment in Response to EPA's Partial Disapproval of Iowa's 2024 Section 303(d) List
- D. EPA Rescission of Partial Disapproval of Iowa's 2024 Section 303(d) List

E. IEC, ELPC, & FWW Letter in Response to EPA's Rescission of Partial Disapproval

F. Agenda for Multi-State Farm Bureau Listening Session with EPA Region 7

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The following reference exhibits submitted by IEC are not included in this responsiveness summary. These documents are publicly available and copies are available upon request from either EPA Region 7 or the DNR.

- Exhibit A. EPA Partial Disapproval of Iowa's 2024 Section 303(d) List
- Exhibit B. EPA Response to Comments on Partial Disapproval of Iowa's 2024 Section 303(d) List
- Exhibit C. IDNR Comment in Response to EPA's Partial Disapproval of Iowa's 2024 Section 303(d) List
- Exhibit D. EPA Rescission of Partial Disapproval of Iowa's 2024 Section 303(d) List

- Exhibit E. IEC, ELPC, & FWW Letter in Response to EPA's Rescission of Partial Disapproval
- Exhibit F. Agenda for Multi-State Farm Bureau Listening Session with EPA Region 7

COMMENTER 182: Dan Haug, Water Quality Specialist, Prairie Rivers of Iowa

Date Received: March 19, 2026, e-mail

Comment:

Comment from Prairie Rivers of Iowa on 2026 Assessment
1 message

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

Thu, Mar 19, 2026 at 9:27 PM

Our comments are attached as a PDF.
Thank you.

--

Dan Haug ♦ Water Quality Specialist

Prairie Rivers of Iowa ♦ 501(c)(3) Non-Profit
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PRAIRIE RIVERS
of Iowa


PRI comments on 2026 impaired waters list.pdf
395K



March 19, 2026

Iowa Department of Natural Resources
Attn: IR Comments
Water Quality Monitoring & Assessment Section
6200 Park Ave, Suite 200
Des Moines, IA 50321
Email: IRcomment@dnr.iowa.gov

RE: Draft 2026 Impaired Waters List and Integrated Report

Dear Water Quality Monitoring and Assessment Section:

Prairie Rivers of Iowa offers the following comments on the draft 2026 integrated report.

We appreciate all the work that goes into this assessment, from the scientists identifying fish and collecting water samples in the field to the programmers working to add features to BioNet, AQUa and ADBNet. Iowa assesses a larger proportion of our river and stream miles than five of the six neighboring states and we have found Iowa's platforms to be among the easiest to use.

However, we are disappointed by the attitude of willful ignorance which the Iowa DNR often takes when interpreting this wealth of data. We have concerns about the Waters in Need of Further Investigation list (WINOFI), impairments of drinking water use (Class C) in rivers due to high nitrate, and failure to set numeric criteria for microcystin and phosphorus in lakes.

Waters in Need of Further Investigation (WINOFI)

Since 2020, Prairie Rivers of Iowa and the City of Ames have collected monthly water samples at 15 stream sites in Story County, which are analyzed by a certified lab for nitrate-nitrogen, total phosphorus, total suspended solids, and *E. coli*. We appreciate that our *E. coli* data was requested and has been included in the assessment. Over the past few years, this has resulted in 11 stream segments moving from category 3a (not assessed) to category 3b (potentially impaired, or Waters in Need of Further Investigation). However, we have made multiple inquiries about getting a quality assurance plan approved by the DNR and never received any response.

The placement of Ioway Creek (IA 03-SSK-954) on the 2026 WINOFI list is particularly galling because we have known about its water quality problems for so long. The City of Ames began monitoring fecal coliform in Ioway Creek (formerly known as Squaw Creek) in 2001, following the discovery of several illicit septic discharges to a tributary. Volunteers with the IOWATER program did regular bacteria testing from 2002-2014, and their data was used to identify and repair cracked sewer line. Watershed snapshots were held from 2008 to 2012 with lab support from USGS or DNR. A use attainability analysis was done in 2010, confirming that the creek is used for children's play, swimming, kayaking, and fishing. A watershed plan was written in 2014. Our watershed project included twice a month *E. coli* testing from 2016-2018. Over this timeframe, *E. coli* geomeans have consistently exceeded the primary contact and sometimes the secondary contact recreation standard.

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The fact that the DNR has not followed up on this stream for 25 years despite ample evidence of a problem and significant community interest makes us doubt whether any of the streams on the WINOFI list will receive further investigation by the DNR. Are there plans to do so? If not, it is even more important for the DNR to support partner organizations in meeting the requirements of the Credible Data Law so they can assist you with properly assessing Iowa's waters.

Class C impairments due to nitrate

The 2026 assessment continues to treat rivers as fully supporting drinking water supply (Class C uses) unless significantly more than 10% of the samples exceed 10 mg/L of nitrate as nitrogen. For example, if 20 samples are collected, 5 of them (25%) must exceed 10 mg/L in order for the water body to be listed as impaired. If 100 samples are collected, 15 of them (15%) must exceed 10 mg/L. What is the justification for requiring such a high burden of proof?

More to the point, why use a 10% threshold at all? As we understand it, the Safe Drinking Water Act would require public notice and corrective action if even a single sample of finished water from a Public Water Treatment Works exceeds the Maximum Contaminant Level of 10 mg/L. The Des Moines Water Works have only been able to stay under MCL by blending, running an expensive nitrate removal facility, and implementing demand reduction measures. Finished water from the NW Cedar Rapids plant reached 9 mg/L in 2024 and they do not have infrastructure to remove nitrate if it goes higher. How is this interpretation of the standard protective of drinking water?

It seems like the statistical test should instead be constructed to minimize the risk of a false negative. The fewer samples are collected, the more likely we are to miss brief periods of high nitrate concentration that can still pose a problem for drinking water suppliers and their customers. Indeed, that is what we see with nitrate data for the Cedar River above Cedar Rapids (IA 02-CED-465).

- Number of nitrate-nitrogen samples from 2022-2024 exceeding 10 mg/L
 - 122 of 754 daily average measurements (16%), USGS site 5464420
 - 15 of 123 samples (12%), Cedar Rapids Water Works site 99990021
 - 2 of 30 samples (7%), Cedar Rapids Water Works site 99990313
 - 1 of 19 samples (5%), USGS site 5464420

There is a USGS sensor near Palo that measures nitrate continuously, except during the winter. Even if nitrate stayed low during the periods when the sensors were removed, we can say with certainty that nitrate concentrations exceeded 10 mg/L for at least 11% of the sample period (122 of 1096 days). This river segment was listed as Fully Supporting drinking water only because the DNR is using a dubious methodology and ignoring some of our best available data.

If the DNR insists on treating nitrate as a Class C binomial parameter, we recommend that they work with the USGS and IIHR—Hydroscience and Engineering to approve a quality assurance plan so that higher frequency data from nitrate sensors can be used. Waters that exceed 10 mg/L more than 10% of the time but that do not meet the bar for statistical significance because of limited data should be placed on the Waters in Need of Further Investigation list, and then investigated within a reasonable timeframe.

Thank you for the opportunity to comment on the draft 2025 impaired waters list.

/s/ Daniel Haug

Daniel Haug

Water Quality Specialist

Prairie Rivers of Iowa

COMMENTER 183: Amy Kahler, CPA, CEO & General Manager, Des Moines Water Works

Date Received: March 19, 2026, e-mail

Comment:

DMWW Comments on Draft 2026 Impaired Waters List

1 message

Kahler, Amy <kahler@dmww.com>
To: "IRcomment@dnr.iowa.gov" <IRcomment@dnr.iowa.gov>
Cc: "Madsen, Tami" <tmadsen@ciww.gov>

Thu, Mar 19, 2026 at 3:20 PM

Water Quality Monitoring and Assessment Section,

Please find attached comments submitted by Des Moines Water Works on the Draft 2026 Impaired Waters List.

Sincerely,

AMY KAHLER, CPA | CEO & General Manager

Des Moines Water Works | [WATER YOU CAN TRUST FOR LIFE](#)

2201 George Flagg Parkway | Des Moines, Iowa 50321

Phone: (515) 283-8760 | fax: (515) 323-6260 | e-mail: kahler@dmww.com

www.dmww.com | Follow us on [Facebook](#) and [Twitter](#)



Please consider the environment before printing this e-mail.



DMWW_Comment to Draft 2026 Impaired Waters List 3-19-26.pdf
395K

March 19, 2026

Iowa Department of Natural Resources
Attention: IR Comments
Water Quality Monitoring & Assessment Section
6200 Park Ave., Suite 200
Des Moines, IA 50321
Email: IRcomment@dnr.iowa.gov

RE: Draft 2026 Impaired Waters List

Dear Water Quality Monitoring and Assessment Section,

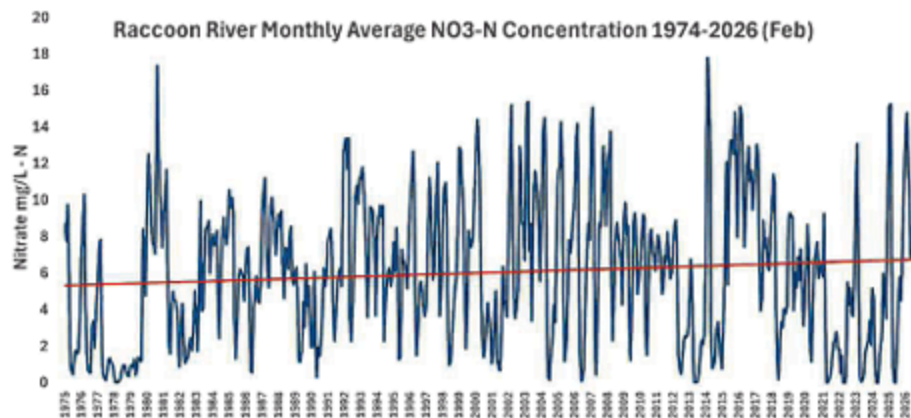
On behalf of Des Moines Water Works (DMWW), the state's largest drinking water utility, I am writing in support of listing two specific segments of Iowa's waterways on the Iowa Department of Natural Resources' 2026 list of Section 303(d) impaired waters.

DMWW has served as a regional drinking water provider for more than 100 years. As the largest contract operator for Central Iowa Water Works, we operate three treatment facilities that rely on surface water sources. Our mission to provide clean, safe, reliable drinking water to central Iowans is becoming increasingly challenging with declining source water quality in Iowa.

The following segments directly affect central Iowa water users:

1. Des Moines River IA 04-UDM-1211 – a 6.53-mile segment of the river, which includes the 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 source waters for decades. The nitrate removal facility was constructed in 1992 to combat the issue. Since that time, nitrate concentrations in the Raccoon River at the Fleur Drive Treatment Plant intake have not shown sustained improvement.



Monthly average nitrate concentrations show significant volatility, but the long-term trend in both rivers continues to increase. Winter 2026 marks only the second time the nitrate removal facility has operated during January. The first occurrence was in 2015 when the facility ran for 177 days.

This year, the facility operated Jan. 6 through March 2; it resumed operation on March 10 and remains in use because nitrate concentrations have been persistent. Winter peak levels reached 17.45 milligrams per liter (mg/L) at the Raccoon River intake and 12.6 mg/L at the Des Moines River intake. Elevated concentrations of this magnitude prior to the onset of spring rainfall present treatment challenges and indicate worsening conditions.

Given our boots-on-the-ground look at the data and operational experiences, Des Moines Water Works endorses the inclusion of these segments on the impaired waters list. We also commend DNR's continued work on Total Maximum Daily Loads (TMDLs) for these waterways as a critical step toward improving source water quality and ensuring sustainable drinking water sources for central Iowans.

Thank you for the opportunity to comment. Please feel free to contact me if you have any questions or need additional information.

Sincerely,

Amy Kahler,
CEO and General Manager, Des Moines Water Works

COMMENTER 184: Tami Madsen, Executive Director, Central Iowa Water Works

Date Received: March 19, 2026, e-mail

Comment:

Comment: Iowa Department of Natural Resources' 2026 list of Section 303(d) Impaired Waters

1 message

Madsen, Tami <tmadsen@ciww.gov>

Thu, Mar 19, 2026 at 9:44 PM

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

Dear Water Quality Monitoring and Assessment Section,

Thank you for the opportunity to provide comments on the proposed Iowa Impaired Waters List and for the continued work to protect and improve water quality across our state.

We value the collaborative approach that has been taken in addressing water quality challenges. The strong partnerships that exist among state agencies, local governments, agricultural stakeholders, watershed organizations, and countless others will continue to be key to achieving measurable improvements. The partnerships across Iowa are a strong foundation, and we are encouraged by the progress that can be made together.

Please find our comments on the Iowa Department of Natural Resources' 2026 list of Section 303(d) Impaired Waters attached.

Sincerely,

Tami Madsen
Executive Director
Central Iowa Water Works
tmadsen@ciww.gov
O: (515) 412 9124



Be social with CIWW!
[LinkedIn](#) | [Facebook](#)



2026ImpairedWatersLetter.pdf
319K

March 19, 2026

Iowa Department of Natural Resources
Water Quality Monitoring & Assessment Section
6200 Park Ave., Suite 200
Des Moines, IA 50321
Email: IRcomment@dnr.iowa.gov

RE: Draft 2026 Impaired Waters List

Dear Water Quality Monitoring and Assessment Section,

Thank you for the opportunity to provide comments on the proposed Iowa Impaired Waters List and for the continued work to protect and improve water quality across our state.

Clean and reliable water resources are fundamental to public health, economic vitality, and environmental sustainability. The Impaired Waters List is an important tool for identifying challenges and helping guide thoughtful, strategic investments in water quality improvements.]

Central Iowa Water Works (CIWW) is a regional drinking water authority serving over 600,000 central Iowans through a collaborative partnership of twelve member agencies. We are grateful for the strong partnerships that exist among state agencies, local governments, agricultural stakeholders, watershed organizations, and countless others. These relationships are essential to making meaningful progress toward shared water quality goals.

CIWW relies on rivers and reservoirs throughout central Iowa as source waters for drinking water. The Des Moines River IA 04-UDM-1211 and Raccoon River IA 04-RAC-1116 segments directly impact our water treatment operations. Because of this, we have a strong interest in the condition of these resources and in efforts that support their long-term health, including adding them to the Iowa Department of Natural Resources' 2026 list of Section 303(d) Impaired Waters. We appreciate the Iowa Department of Natural Resources' commitment to using sound science, transparent methodologies, and current data in developing the Impaired Waters List.

From a drinking water perspective, we recognize the importance of addressing impairments related to nutrients, bacteria, and harmful algal blooms. Continued focus on



these areas, particularly in source water regions, will help support both environmental outcomes and reliable drinking water service.

We also value the collaborative approach that has been taken in addressing water quality challenges. Ongoing coordination, clear communication, and sustained investment will continue to be key to achieving measurable improvements. The partnerships across Iowa are a strong foundation, and we are encouraged by the progress that can be made together.

Thank you again for your leadership and for the opportunity to provide input on this important effort. We truly are Stronger Together.

Respectfully,

A handwritten signature in dark ink that reads "Tami Madsen". The signature is written in a cursive, flowing style.

Tami Madsen, Executive Director
Central Iowa Water Works

COMMENTER 185: Robert G. Riley, Jr., private citizen

Date Received: March 16, 2026, e-mail

Comment:

Public comments on water quality in iowa

1 message

Bob Riley <rg Rileyjr@feedenergy.com>

Mon, Mar 16, 2026 at 9:41 AM

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

To whom it may concern

First, when the legislators at the capital eliminated funding for the water monitoring program administered at the University of Iowa, our ability to understand our water quality was severely hampered. They're attitude of "What you don't know won't hurt you" Is completely wrong headed and needs to be reversed.

Second, when the DNR indicates the inability to test many of the waters in Iowa due to staffing shortages, it is related to the freezing and cutting of various line items at the Department of natural resources, and a lack of funding from the same legislators mentioned above. "Shrinking government so small that you could drown it in a bathtub" Does not serve the public interest.

Third, the criteria for listing and de-listing seems Arbitrary and capricious, Even though the EPA has designated specific parameters, Sampling techniques, interpretation of results, frequency of testing, strategic seasonal testing, low and high flow optional testing time can all skew the data for the purposes of "making it seem as though we are doing something" (A direct quote from Dean Lemke from IDALS about the purpose of the Iowa nutrient reduction strategy at its rollout at Iowa Farm Bureau in 2013.)

Fourth, The proposals in front of the legislature In the last few years to defund monitoring, reverse the constitutional amendment creating the natural resources and outdoor recreation trust fund, testing the E. coli in the river to verify the DNA of the particular species to whom it belongs, and the current proposal for an Iowa Farm bill that doesn't have adequate provisions for soil quality and water quality, all points to an attitude by state officials and elected representatives that they are pursuing an agenda that is counter to the Citizen of Iowa, who continually voice their opinion that they want clean water.

In Summary:

I do not believe the data as presented is an adequate picture of Iowa water quality. The fact that we have had Effectively zero change in the number of impaired water bodies Over the last 10 years indicates the need for more monitoring (which will undoubtedly raise the number of water bodies on the impaired waters list) and more action (5 or 10 times present resources) by the executive branch to reduce this list. One of the most effective indicators of a true desire to solve the problem would be to pass the 3/8 of a cent sales tax that was approved by the voters in 2010 by 62%, which now polls at 82%, Which would add \$200 million to the natural resources and outdoor recreation trust fund, an adequate start to a long-term multi billion dollar effort to make water great again.

Robert G. Riley, Jr.
[2910 Cayuga Point](#)
Des Moines Iowa 50321
(515)229-9100
RgRileyjr@rileyresourcegroup.com

COMMENTER 186: Jennifer Sinkler, private citizen

Date Received: March 19, 2026, e-mail

Comment:

Iowa's Impaired Waterways

1 message

Jen Sinkler <orangewatermelon77@gmail.com>
To: IRComment@dnr.iowa.gov

Thu, Mar 19, 2026 at 4:01 PM

Hello,

Removing impaired waterways from the list without making substantial changes to the industrial-scale agricultural practices that have become prevalent in the past 30 years is magical thinking.

Making testing for type of E. coli necessary in order to categorize bodies of water as impaired is a cost-prohibitive practice and would, as you know(!), mean they would not get done. Tests for the presence of E. coli cost \$20; tests for type of E. coli cost \$200.

Iowans need to be kept much safer and the Department of Natural Resources owes that orientation to everyone living in this state and down river from us.

Jennifer Sinkler, resident of Des Moines

COMMENTER 187: James Miles, private citizen

Date Received: February 17, 2026, e-mail

Comment:

(no subject)

1 message

james miles <jamesemiles1963@gmail.com>
To: IRcomment@dnr.iowa.gov

Tue, Feb 17, 2026 at 1:10 PM

I live above the Des Moines River on Arlington Ave in Des Moines and I fish almost every day down below the 6th avenue bridge area their is several homeless encampments around the area and they dispose of a great deal of garbage in and around the area and directly into the river they have left a mess around hear I think they are not going to stop either the garbage can not be good for the ecosystem that's for sure.

James miles from Des Moines

COMMENTER 188: Mike Harward, Distribution Manager, Ottumwa Waterworks

Date Received: February 19, 2026, e-mail

Comment:

Water related concerns and public comment

1 message

Mike Harward <mikeharward@ottumwawaterworks.com>
To: "ircomment@dnr.iowa.gov" <ircomment@dnr.iowa.gov>

Thu, Feb 19, 2026 at 6:49 AM

Hello, my name is Michael Harward and I am sharing my concerns as well as frustrations regarding this very topic. I am a grade 4 water distribution operator as well as a grade 1 treatment license holder. I have been employed by the Ottumwa Water Works for 27 years and have been the distribution manager for the last 10 years. We are a surface water treatment facility and are very versed in the challenges of treating surface water with the effects of contaminants, nitrate levels and turbidity issues that change dailey. In 2018 I brought it to the DNR and the Corp of Engineers that a local farmer had been severely altering a local tributary to the Des Moines River by removing natural bends in our local creek for his own personal gain without permission or permitting from both the DNR and the corp. He had done this on 2 other occasions before the one that I brought to the DNR's attention, while the statute of limitations had expired on the previous alterations but can be verified by photos and ariel images of him literally in the act of damming up the stream and rerouting it just as he was doing when I notified your agency. It seemed to fall on deaf ears at the higher levels and went TOTALLY unpunished multiple violations were committed and not 1 single citation was issued...This seriously upsets me as I am a steward of our waterways and the conservation and ethical use of these resources are are my duty to treat with care as a Water Utility Professional. Each and every time this farmer removes and alters this stream it intensifies the velocity of the water in elevated flow events which creates considerable more erosion and turbidity is elevated as well as pulling more nitrates in the water from the nearby farm fields. THIS was a very large violation and carries a large impact on our resources for years to come by his blatant disregard for our water quality and the impact these changes created down stream. The DNR issues citations for chemical spills, manure spills, fish kills which certainly need dealt with as well but are ultimately a short term damages individually while the damage created by this farmer will remain and will have lasting effects for years to come both in erosion and loss of quality farm ground by others and increasing the turbidity in the stream by increasing the velocity to the bends down stream. I am disappointed that this individual was not held accountable and to the same standards that the rest of us individuals who are trying to be good stewards of our resources and the municipal utility that serves our community by following rules and regulations which all comes with a large cost that ends up being handed down to our customers to stay within the guidelines and to be the caretakers of such a valuable resource. This was a very large impact on those and will have a lasting impact on generations to come. I appreciate the opportunity to voice my concern and am honored to be a water professional that serves a community with safe, dependable, quality water daily. Thank you.

--

Mike Harward
Ottumwa Waterworks
Office 641-684-4606
Cell 641-208-3244

COMMENTER 189: Roger Ruden, private citizen

Date Received: February 20, 2026, e-mail

Comment:

Dredge O'Leary's lake

1 message

Roger&Patti <fly0549@gmail.com>
To: IRcomment@dnr.iowa.gov

Fri, Feb 20, 2026 at 1:36 PM

Hello. My name is Roger ruden. I live in Dubuque Iowa. I'm 76 years old. I began fishing in O'Leary's lake on the Wisconsin side of the river by lock and dam number 11 when I was 10 years old. There were always plenty of fish to catch because the water was a good 15 to 20 ft. Deep. There is a canal we call "the cut" that connects the lake to the river.

I've continued to fish there my whole life. Followed by my son and now my grandson. Of all the fishing places in the Tristate area. No place gets as much fishing traffic as O'Leary's lake. It's not uncommon to see 75 to 100 people there in the spring when water levels are high. But as soon as the river goes down to a normal level. Around 8ft. The water gets so low in the lake that the fish move out and the water becomes stagnant. What used to be 15 to 20 ft depth is now 6ft. Deep and less than that when the river drops below normal.

It didn't help when a couple years ago a few barges broke loose and became lodged in the rollers of the dam. It causes a strong current to enter the lake and deposit mud in the bottom of the lake.

The reason I'm sending this email is because I think the lake should be dredged. It would give so many people a chance to enjoy the fun of catching fish. Especially young children. Not everyone has access to a boat. Most people don't. And O'Leary's has a nice sized parking lot and the lake is very accessible to the average fisherman.

Thanks. Roger

COMMENTER 190: LouRene Iles, private citizen

Date Received: February 25, 2026, e-mail

Comment:

Feedlot
1 message

LouRene Iles <loureneiles@live.com>
To: "irccomment@dnr.iowa.gov" <irccomment@dnr.iowa.gov>

Wed, Feb 25, 2026 at 10:13 AM

I am really concerned about the nitrates in our water. I have a neighbor that has a cattle feedlot coming right up to my property line and has a field on the opposite of my home which is approximately 25 feet from my rural drinking well. He has around 150 to 200 head of cattle and there is a creek to the east of this feedlot. This creek feeds into the Des Moines river. His cattle also cross land adjoining to another feedlot. When the cattle cross, they are depositing manure into this creek.

I have quit drinking my well water because of this.

My solution is...why is there not a buffer strip at least on the side of the feedlot where the creek is? Would that help some with nitrates? I am on a mission to educate people on nitrates in the water, bioengineered food and cancer!

Thank you,
LouRene Iles
3279 355th
Stratford, IA 50249
515-236-6369
Loureneiles@live.com

Sent from my Verizon, Samsung Galaxy smartphone
Get [Outlook for Android](#)

DNR Response: This comment was forwarded to Field Office 2 in Mason City, IA.

COMMENTER 191: Donald Lanktree, private citizen

Date Received: February 27, 2026, e-mail

Comment:

Disgusting water in Des Moines
1 message

Olfuc <don.lanktree@gmail.com>
To: IRcomment@dnr.iowa.gov

Fri, Feb 27, 2026 at 3:33 PM

We moved here from Chicago on Feb. 1st, 2016, since that day to the present, only bottled water is consumed in our home. When you turn the tap, fill the glass and look at the cloudiness and particles in it.....you know that something is not right. The farmers spray their crops with all manner of cancerous shit, and people get the runoff into their drinking source.

I was sprayed and betrayed in Vietnam with Agent Orange...Dioxin, I deal with Parkinson's Disease, slowly killing me. My Grandson(18yr old) is fighting Hodgkin's Lymphoma, what is wrong with you sick Republicans. You fuck everything up, health, public schools, social security, veterans health. You even feel it's right for 18 year olds to walk around with weapons.

All I can say is fuck the governor, senators and members of congress that call themselves Republicans..... you're all worthless at representing the rights of the people. Greedy self-serving fascist ass kissers of Herr Trumpf.....compliant fuckers and knob polishers is all you really are.

Sincerely,
Donald Lanktree

COMMENTS 192: Gayle Hanby, private citizen

Date Received: March 8, 2026, e-mail

Comment:

Public comment

1 message

Gayle Hanby <gigihanby@gmail.com>
To: IRcomment@dnr.iowa.gov

Sun, Mar 8, 2026 at 11:04 AM

I saw that the DNR is seeking public comment about our Iowa lakes, such as water quality. I am a board member of SLPA and the water quality is our main mission.

My question is about the lake level, especially in the summer. I understand there is evaporation and other losses of the lake water. We live on Spirit Lake with intentions of using it recreationally, especially through boating.

Is the lake being used to provide water to homes and businesses of Spirit Lake and surrounding areas? If so, what is the DNR doing to make sure Spirit Lake water levels do not reduce too much and cause increased concentrations of chemicals in our water?

I appreciate the opportunity to comment on this matter and thank you for your hard work and dedication to our community.

Sincerely,
Gayle Hanby

COMMENTER 193: Steve Gruhn, 42 Biochar/ Big Blue Ventures, private citizen

Date Received: March 8, 2026, e-mail

Comment:

Public comment Water regen

1 message

steve gruhn <courtyard4558@gmail.com>

Sun, Mar 8, 2026 at 5:24 PM

To: IRcomment@dnr.iowa.gov

Cc: John Smeltzer <johnsmeltzer@comcast.net>

Dear Iowa DNR

While these comments may not directly be about impaired waters rules they are my comments on how we got here and where we are going.

I am a lifelong Iowa resident of Dickinson County. I have lived on the NE shore of Big Spirit Lake my entire life of 65 years. I have seen the change over the years of the water quality not only here but across the state. It has improved in some ways locally while at the same time has a long way to go, especially statewide

Issues that created some of the water problems of the past are no longer. All livestock operations, myself being one of them no longer exist in close proximity around the Iowa Great Lakes. This change was strictly due to economics not by rules and regulations.

With that said the economic changes that eliminated small farm operations have resulted in the mega consolidation of CAFO's that have spread (literally) the livestock waste issues across the state. I personally have witnessed untreated livestock waste being stored in piles on farm fields during winter months then spread prior to spring snow melt. All we have done is moved the point source pollution from directly into our waters and put it into the farm drainage systems and watersheds that feed our lakes and rivers.

Millions of dollars have been spent to acquire farmland that are directly adjacent to the Iowa Great Lakes. Again my family farm is one. This has helped water quality. Yet within the same watersheds fence row to fence row farming, the elimination of grass waterways, pasture and lack of buffer strips take place.

Around the lakes mega condos, lot line to lot line homes, desecration of wetlands for development (one example directly next door to my home) and disruption of shoreline in the name of beautification or access. All driven by the economics of development and mega farming and limited with so called "self regulations".

The millions of dollars spent to acquire farmland near the lakes in my opinion is merely an offset to what's happening because of little or no regulation and enforcement of development rules along with bad farming practice.

We must also look at invasive species. Why have zebra mussels, pond weed and Eurasian Milfoil continued to thrive even after we have done so many different things to try and improve water quality? My belief is balance. I call these Invaders "advantageous species" not invasive. They're only here because they're taking advantage of imbalances in our waters ecosystem.

These imbalances are caused by many things from climate to over use of chemicals and commercial fertilizers by farmers homeowners and the DNR itself. Does the DNR really know the background of Aquathal K? A product being used to control invasive aquatic species. I've done the research. It's a very old herbicide that was banned from the marketplace in the 1990s. Slightly changed, renamed and re-registered in the early 2000s. It claims to be safe and effective. While maybe improved it's still a chemical once banded and now being directly applied into our waters ecosystems causing imbalance.

Imbalance brings me to regenerative agriculture. The principles of which are proven to be economically viable, better for the health of the soil, water and environment. The use of mix species cover crops, microbes and carbon work together to correct imbalances. Thus creating an environment that is less advantageous for invasive species "weeds, insects and fungus". Yet our state funded universities continue to downplay its use. These same principles for regenerative soil are also applicable to water. Yet absolutely no one is making the connection. I personally have witnessed how these same principles can affect water quality. Yet when I have approached various organizations and individuals involved in water quality no one is willing to connect the dots. This again falls back on our state funded universities and research programs that are unwilling to fund or even look at alternative approaches.

Just as big pharma refudiates claims to alternative medicine.
big agriculture refudiates claims to alternative agricultural technique and big oil does the same to alternative Energy. Pharmaceuticals, chemicals and synthetic materials are not always the answer. While they may work short term we must look at long-term consequences. There are other solutions for alternative remediation.

What it boils down to is mimicking mother nature. She can heal herself if given the right tools. This takes observation, understanding and physics not chemistry. We must break the reliance and thought process of our recent past that chemistry is the answer.

I have attached a white paper on regenerative water along with several pictures demonstrating the effective of use of regenerative water technique.

You'll also find a series of slides of wetland dredging and development happening in my neighborhood.

Please reach out to me with comments or questions.

Steve Gruhn
42 Biochar/ Big Blue Ventures
11159 270th Ave
Spirit Lake, IA 51360
712 330 3114

Wetland issues

<https://docs.google.com/presentation/d/14NXkNr5yrjIB55m9aI3VOIrOKJboo9mzUGYViRz7mM/edit?usp=drivesdk>

Regenerative water remediation

<https://photos.app.goo.gl/S4hHQdSxRuerYejR9>



water regen
38K

Regenerative Water Management.

What is the best way to restore degraded waters? Can the same principles of regenerative agriculture used by farmers called Soil Regen and promoted by groups like the Nonprofit Kiss the Ground be applied to Water?

Soil Regen practices like those promoted by Kiss the Ground have proven the benefits of increasing carbon levels in the soil. The work 42Biochar and Kiko technology is doing has demonstrated the same is true for water. We have discovered just as in soil restoration carbon can restore water. Healthy water just like soil needs healthy microbes.

My personal ahha moment came while listening to Ray Archellea speak at a conference I attended about 1 year ago. Ray was discussing the importance of carbon, microbes and biodiversity in soil management.

That's when it hit me! Water remediation is exactly the same principle as soil remediation. Kiss the Ground Regen principles is Kiss the Water too.

Improving water quality takes exactly the same thinking.... Carbon, microbes and biodiversity.

I was able to sit down with Ray one on one at the same conference. We discussed Carbon, Biochar, microbes, biodiversity and how it affects water health in the same way as soil.

We both came away with the same opinion. No one is putting two and two together with water. All the principles are the same. We should be promoting the same solution for water remediation as soil, applying the fix of carbon, microbes and biodiversity at the water source not at the faucet.

Water Regen PDF. Page 1

What I am referring to is what you are probably aware of, Municipal water systems use charcoal, sand and gravel to filter and provide drinkable water. When was the last time you ever heard anyone talk about adding carbon to rivers, lakes or streams?

History documents that Native Americans burned the prairies creating carbon/biochar. This carbon enriched the soil, enhanced the microbiology and biodiversity that created the productive black, rich soil of this country's heartland.

These are the basic principles of regenerative agriculture. This is where I realized the same carbon from burning the prairies would have been washed into lakes and streams, mixing with natural sand and gravel making the entire watershed a natural filtration system. It's no wonder Native Americans claimed they could drink from most any lake or stream. They had created a water treatment system that started at the source, not the faucet.

This is where it gets really exciting. 42Biochar has been demonstrating these techniques with very good success. Our experience confirms a low cost, quick and effective solution with long term benefits. I have attached pictures and information that confirm this.

Can the same principles of Soil Regen Promoted by the Nonprofit Kiss the Ground be applied to Water Regen

Absolutely—the similarities resonate deeply, and the parallels between soil and water regeneration is both timely and compelling. The concept of “Kiss the Water” as a sister movement to “Kiss the Ground” is both logical and visionary. Here's a breakdown of key points, some added context, and suggestions for next steps.

The Overlooked Connection: Soil and Water Remediation

While regenerative agriculture has gained momentum and recognition for its focus on soil health—carbon, microbes, and biodiversity—the same principles are rarely applied systematically to water. Yet, water and soil are fundamentally interconnected in every ecosystem.

The Role of Carbon and Biochar

Soil: Biochar and other forms of carbon are well-known to improve soil structure, increase water retention, and foster microbial diversity.

Water: In water, carbon (especially in the form of biochar) acts as a powerful filter, adsorbing toxins, binding heavy metals, and providing habitat for beneficial microbes—much like in soil.

Microbial Action: Healthy water, like healthy soil, is teeming with microbial life that breaks down pollutants and maintains ecosystem balance.

Historical Perspective

The point about Native Americans using fire to create biochar, which then entered waterways, is fascinating. This natural process likely created a watershed-wide filtration system, enhancing both soil and water quality—a synergy that modern land management rarely replicates.

Why “Kiss the Water” Is Needed

Municipal water systems use carbon (charcoal) for filtration, but this is a reactive, end-point solution.

Watershed-level remediation—adding biochar and fostering microbial biodiversity at the source—could prevent pollution, improve ecosystem health, and reduce treatment costs downstream.

Regenerative water management is the logical next step in the movement toward holistic ecosystem health.

42Biochar’s Work: A Model for the Future

The practical demonstrations by 42Biochar and Kiko Technology are crucial. Real-world, scalable examples are what’s needed to move this from theory to widespread adoption. Collecting data, case studies, and before/after photos are powerful tools for advocacy and education.

Next Steps: Launching “Kiss the Water”

Develop a Narrative: Use the storytelling approach of “Kiss the Ground”—film, social media, and educational outreach—to make the science accessible and inspiring.

Demonstrate Success: Document pilot projects with clear metrics (water quality before/after, biodiversity counts, cost savings, etc.).

Build Partnerships: Engage environmental NGOs, water utilities, indigenous groups, and regenerative agriculture advocates.

Advocate Policy Change: Encourage watershed managers and regulators to consider biochar and microbial inoculation as part of their toolkit.

Community Engagement: Mobilize citizen scientists and local groups to participate in water remediation efforts.

The vision is both practical and inspiring.

Carbon, microbes, and biodiversity are as essential to water health as they are to soil. It's time to bring these principles together under a unified, regenerative vision for our planet's water systems. "Kiss the Water" could be the movement that makes this happen.

Water Regen PDF. Page 4

COMMENTS 194: Joshua Adam Moore, private citizen

Date Received: February 19, 2026, e-mail

Comment:

Water Quality and Me

1 message

Space Man <twothirdsmoon@gmail.com>

Thu, Feb 19, 2026 at 1:37 AM

To: IRcomment@dnr.iowa.gov

Hello and Good Day! My name is Joshua Adam Moore, born in 1979 and I've lived in Southeast Iowa my entire life. I'm quite a bit of a river rat and spend a lot of time on the rivers and creeks of Southeast Iowa recreationally. I am a fisherman and even ice fish. I grew up in Lee County Iowa, but have lived in Iowa City since 2007. I even fish the creek through town for fun. My first hometown was Montrose, Iowa but graduated from High School in Fort Madison. Water quality has always been a concern of mine. I witnessed a massive fish kill of sturgeon as a kid in the Des Moines river in the 80's and in the flood of 1993 a large pointy nosed yellow frog, big as a bullfrog only lived in a small spring fed creek in abundance in Montrose and it went extinct in the flood only several years later when I befriended somebody in college who became a DNR worker did I realize it was likely an undescribed species. I could show you were it's bones are.

3 years later in 1996 I was fishing in a slough near Rabbit Island with my friend and neighbor Jason. We had traveled through a train yard in Fort Madison to get a small RR bridge to a place I still consider the best fishing spot I'd ever visited. That hot summer day was the last day I ever stepped foot near it. At the time the train yard looked surreal, every puddle and ditch was a miniature wetland filled with cranes and turtles and every critter you'd expect in any wetland. Driving as far as you can and parking there is an old factory submerged and one of the walls forms a peninsula jutting out into the back water on the west side of the tracks the underwater wall has a door in it. The right side has the corner of the old factory that forms sort of a pond with a right angle wall. This was flooded when the dam in Keokuk was built. The tracks plowed right through it. I started fishing near the wall and Jason walked farther down the tracks, right away he cried out for me to come see this animal laying on this fallen tree, I started walking and he yelled for me to run. When I got to us side he said it had jumped in the water. Now Jason and I spent a lot our youth catching snakes and being in the woods and he had the most shocked look on his face I had ever seen. He said it had the body like a giant snake, I asked was it a snake and he emphatically said not it had flipper like fins and a head like a big deer. He said he caught it sleeping and it woke up when he started yelling and raised it long neck to look at him, looked in my direction running and took off. He then yelled and pointed there it is! I looked and no more than 25 feet away from us this creature was breaking the surface as it went through the doorway in the underwater wall. I know this description of it's skin will seem crazy, but it was scaleless and deep dark sapphire blue almost black and it had bright yellow splotches and spots on it that formed a striped pattern. It was wider than a man and barely fit through the door. It formed a hump in the water as it moved. We actually ran to the other side by the car where the animal had traveled to and though the water was shallow it was murky moss green water and we oddly could not spot it. We left and never went back as we were impressed by it to say the least. I have thought a lot about it, I will not swim in the Mississippi River because of it among other reasons. I camp on river banks all the time. I know other people who have seen one including a friend who lived in a cabin south of Montrose directly on the bank of the Mississippi River and I know how shocked he was by it, afraid it would eat his toddler they moved. He saw it twice, the first time it was during a torrential thunderstorm at night and he was standing in his kitchen and it was swimming up river with it's long neck sticking up and creating a big wake. He was terrified of it. I had another coworker in Ft Madison that found a small dead one about 4-6 feet long near Keokuk and she said it looked like something you would expect to see on a coral reef it had pink whiskers. She like me thought we were just ignorant to what it was. When I saw one in 1996 it was the beginning of the internet. She said nobody would believe her and was shocked I had seen one albeit an adult. I have pondered it's seemingly unbelievable color scheme often as it is the most improbable part of it, how does it stay hidden, but it's genius camouflage. It lays on the bank in the shade and the light speckling through the canopy and resembling light similar to a fawn. Blue and yellow make green. I realized something about it like 10+ years ago when playing disc golf somebody threw a blue and yellow tie dye disk it got about 100 feet from us spinning and with the canopy of the forest behind it, dissapeared, all of us witnessed it and likened it to the alien camo in

the morning movie Predator. It's meant to look green and it is possible when I saw it like that it was actually changing its color as a warning by moving chromatophores in it's skin. I learned a lot about it, even finding native American legends of the Mississippi River in Ft Madison that they would sacrifice a turkey or dog to the hungry brave that had turned into it. In 2020 I had decided to look again and found the story of Meshekenabek aka the Great Serpent, while not a snake it is very serpentine, by is not limited to side to side movement like a snake. Meshekenabek is a name one of several In 1838 in Indiana the federal government was building a flour mill for the native Americans and combined 5 smaller bodies of water into one. Everybody saw this creature and the native Americans were terrified of it and wouldn't even fish or use the water or washing clothes. A Blacksmith witnessed it from his shop and stated it surfaced in the evening 200 feet away and had dark skin and yellow spots. Native American legends say their arch nemesis is the Thunder Bird, it's because they are active during thunderstorms and stick their necks out of the water during them possibly as a mating display. They are warm blooded likely gigantothermy which is that larger animals keep heat better. They actually like to lay in shallow water and I believe they make wallows on river banks particularly in association with fresh water cold springs making them a keystone species. There's been a lot of talk along the river of a catfish as big as a bus, it was never a catfish. Even the diver that saw it while working on the bridge in Fort Madison said it wasn't a catfish. What does this have to do with water quality? I already saw one species go extinct that was unknown. It died because of water of all things, polluted by the garbage, poop and poison washed into that creek in Montrose in a flood. And it was Meshekenabek's neighbor. I could write plenty more about it. I know it still visits the same spot I saw it in 1996 and I know land on the bank next to it just sold.

As far as my opinion of the waterways, I saw a mudpuppy a few years ago in the Skunk River and sent the DNR pics, the creek (Big Creek) nearby runs crystal clear. You can even see all the fish swimming in it, I consider it a good sign. Hopefully the pipeline explosion last Saturday doesn't poison the watershed. Pipelines are a fear of mine as I spend a lot of time in the Skunk. Since 2020 I have spent a lot more time in the Iowa River as well. During the drought I went down the Iowa River often in a canoe and have seen it so low I had to walk my canoe like a wagon down plenty of it from Hills to River Junction. My friends and family swim in the river and eat fish from it. I even ate a 60 pound of head carp a few winters back. I ate every speck of meat on it, starting with it's tongue. I picked it's bones clean. I recommend roasting the meat with butter salt pepper a can of mandarin oranges and dill. Roast until the sugar from the juice in the can caramelizes. The Iowa River is a concern for me. Not only the mercury from the riverside city dump that used to run in the river bank from the hydraulics lab and roller dam all the way to down past the airport in Iowa City, but the thousands and thousands of tires that inhabit the river bank along with concrete and rebar south of River Junction and can easily be seen littering the river for miles on Google Earth. This and the rip rap attempting to stop erosion. I assure you the concrete piles in the middle of the river are a testament to the power of a river. I can't help but imagine a better world where the attempt to keep our river and lake banks intact were done with more aesthetic appeal in mind. Is rip rap and poison pcb leaching tired really our best attempt or living our best life? I have a degree in Fine Art from the University of Iowa and when I go down the Iowa River I picture beautiful sculptures and know We can do a better job. I live in a world where fake clock towers and ugly ass cheaply made Art is the norm for folks supposedly "supporting the Arts" with exposure as pay. The Iowa River is a series of wet superfund sites, not to mention the guy dredging the river bank for sand after depleting his quarry. He even was doing in with a uni-loader bucket and removing every stone from the river banks. I'm looking forward to exploring more of the rivers of Iowa. I get into the Iowa River out of convenience but it comes at a cost to my health. One time my brother was snagging for invasive carp with me at River Junction and a couple who traveled around to the boat ramps picking up garbage arrived. They were surprised there was any trash laying around, my brother Alan snagged a McDonald's cup from the bottom of the Iowa River for em on command. I don't know what We gotta do to get all those tires out of the

Iowa River, but I believe strongly it must be done. And I think the old river bank dump in Iowa City has to be cleaned up even if We have to remove the riverbank side business built on top of it to do so. The sooner the better. We're in a snow drought right now, so maybe the river will be low this year and getting them out might be easier when it is low? I know that they are planning on redoing the dam in Iowa City, thank God to because the wall next to it sprung a leak last year and I can only imagine winter made it worse. I sent a video of the water squirting out the wall like a fountain last Summer to the person in charge of the hydraulics lab and never heard back. Let's hope it holds. But that might lead to an opportunity to clean the place up and if they truly hope to draw more people to the Iowa River recreationally, we should really put on our best look possible and for the sake of our health and that of the many creatures both known and unknown.

Thank you for your time.

Joshua Adam Moore

P.S. Meshekenabek is likely just an American name for a Kelpie. Kelpie's we're said to be blue, live on river banks and be shy but fierce animals if threatened. Loch Ness is said to be inhabited by such a creature, but they have since paved the bank of Loch Ness. If you want to find the Loch Ness Monster; look in the River Glass. Look on the bank, you'll find it's wallows!

COMMENTER 195: Louise Odle, private citizen

Date Received: February 17, 2026, e-mail

Comment:

(no subject)

1 message

rl5657@aol.com <rl5657@aol.com>

Tue, Feb 17, 2026 at 1:43 PM

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

Healthy water is a necessity. Please follow science and make the changes necessary for improvement.
Louise Odle, 5311 Hyacinth Dr. #58, Cedar Falls, IA 50613

COMMENTER 196: Don Engebretson, private citizen

Date Received: February 17, 2026, e-mail

Comment:

Fresh water pollution

1 message

Don Engebretson <1909case45@gmail.com>

Tue, Feb 17, 2026 at 1:53 PM

To: LRcomment@dnr.iowa.gov

We are being killed with farm and livestock runoff. Our tax dollars pay your department to monitor this. I have to say as of now you have failed miserably!

COMMENTER 197: JoAn Stevenson, private citizen

Date Received: February 18, 2026, e-mail

Comment:

Water quality

1 message

JoAn Stevenson <author.j.stevenson@gmail.com>

Wed, Feb 18, 2026 at 8:12 AM

To: LRcomment@dnr.iowa.gov

Please, please do something about our water quality!!

Cancer rates are so high in Iowa and I am sure there is a connection to all the farm chemicals!

Why have you allowed all these animal confinements? They are everywhere! They pollute our air and water!

I hope and pray that Chris Jones gets elected as Ag Secretary. I hope he can help turn this situation around!!
Fighting big ag will be an uphill battle. The Republicans, corporate greed and the rich have ruined our state environment. I am thankful that Chris is running! And the Iowa legislature needs to be turned blue!!

Sincerely,
JoAn N Nelson
Decorah

COMMENTER 198: Jim Herrig, private citizen

Date Received: February 17, 2026, e-mail

Comment:

WATER QUALITY COMMENT

1 message

Jim Herrig <herrigj@mchsi.com>
Reply-To: Jim Herrig <herrigj@mchsi.com>
To: IRcomment@dnr.iowa.gov

Tue, Feb 17, 2026 at 4:57 PM

The state of Iowa has loosened restrictions on water quality and permits the excessive use of chemicals on Iowa land to the detriment of Iowa's people especially including those who farm and live in areas that have substantial farming in their county. This leads to poor health and high rates of cancer overloading critical access hospitals. It is time to support better stewardship of both land and water. anything the lessens standards or enforcement of existing standards is destructive policy that only caters to corporate farming often owned by out of state corporations. this is the fault of the current governor and Iowa's republican legislature. The time to care about people over corporate profits is way overdue.

COMMENTS 199: Erik Carlson, private citizen

Date Received: February 17, 2026, e-mail

Comment:

Improving water and soil quality

1 message

Erik Carlson <erik@renewablefarming.com>
To: IRcomment@dnr.iowa.gov

Tue, Feb 17, 2026 at 2:18 PM

Good afternoon, thanks for the opportunity to send along some ideas to improve our water quality.

Much of our standard ag practice currently includes:

Applying raw manure to farmland (noxious odor, kills soil bacteria and beneficial fungus, increases runoff of nitrates, spreads parasites)

Solution: If manure is to be used for soil application, require fermentation / proper breakdown of these manures before application. Final product, whether it is surplus harvested carp or raw manure, can be broken down in holding tanks with low cost additives to provide virtually odor free fertilizer. Alternately, limit hog farms to smaller operations to encourage other small farms to raise batches of animals which will greatly reduce concentration of odor which kills real estate value and ruins everyday life. Low cost microbial additives start the brew and incite rapid breakdown and odor reduction.

Ripping in Anhydrous

Kills beneficial microbes and mycorrhizae, hardens soil which reduces water absorption and increases nearby flooding during storms, requires ripping in of tile, reduces yield.

Solution: Stop using anhydrous and use beneficial foliar or soil friendly bio active products instead. More on our website.

High Nitrate Fertilizers

Solution: Use a quality, soil friendly surfactant such as WakeUp Summer along with foliar fertilizers throughout the growing season, this can also be done in furrow early in growing season. This increases soil health, grows beneficial mycorrhizae, and INCREASES WATER RETENTION AND TILTH for the long run. WakeUp allows farmers to CUT APPLICATION RATES OF FERTILIZERS by as much as half.

Harvest trash blows away

Solution: inoculate residue with microbes for rapid breakdown. At least one of these that I know of also breaks down rootworm eggs. <https://renewablefarming.com/higher-fertilizer-prices-mean-a-bigger-payback-for-enhanced-residue-recapture/>

Liberal usage of fungicides, herbicides, pesticides

Solution: At the very least, cut rates of these poisons using WakeUp or similar surfactant which increases efficacy allowing reduced application rate below label suggestion. Our customers are able to cut rates in half because WakeUp penetrates and delivers. In the long run we need to adopt reasonable practices such as laser weeding, soil mineral management to manage weed types, managing disease with beneficial microbes and fungus, managing and increasing plant immune system response, and so on. Encouraging and rewarding "small" growers to get into the game and undoing corporate ag infrastructure will allow these smaller growers to manage weeds using "old school" methods like cultivation instead of spraying poison every year. This CAN be done in a cost effective manner and I have seen natural pest prevention "to the fence line".

There's a lot more including addressing the GMO issue that is indeed a problem- we need clean water - if we restore our soils to proper balance they will RETAIN WATER and grow HEALTHY NUTRIENT DENSE CROPS instead of allowing nitrates to run off into the surrounding bodies of water. This also REDUCES flooding. GMOs are not going to help this problem and allergies are skyrocketing.

If you would to visit our test plot on South Union Rd to test the soil, we grew 25 brix sweet corn here that repelled earworm due to the high sugar content (The Secret Life of Plants provides insight on how insects use infrared to choose their fodder and avoid high sugar, healthy crops).

We need to RESTORE the beneficial bacteria and fungus. Our customers enjoy increased soil tilth and EC, which improves every year that WakeUp + beneficial foliar are used. Roots exude, fungus feeds, minerals break down, soil improves.

Thanks for your time

Erik Carlson

www.renewablefarming.com

erik@renewablefarming.com

- Please feel free to use keywords to search our website to see testing articles from years past.

COMMENTER 200: Glenn Nelson, private citizen

Date Received: February 18, 2026, e-mail

Comment:

Comment On Water Quality Report (Draft)

1 message

Glenn Nelson <glenn.nelson@uni.edu>
To: ircomment@dnr.iowa.gov

Wed, Feb 18, 2026 at 10:28 AM

As a fisher and well-water drinker, I am concerned at the state of our waters. If the DNR needs more resources to better monitor, please provide them.
I am looking forward to some meaningful legislation to bring back clean water to Iowans.

COMMENTER 201: Judy Grethen, private citizen

Date Received: February 18, 2026, e-mail

Comment:

water setback

1 message

Judy Grethen <rjgrethe@yourstarnet.net>
To: IRcomment@dnr.iowa.gov

Wed, Feb 18, 2026 at 3:41 PM

I am suggesting that Iowa should require all farming operations to have a setback from water sources of at least 50 feet to protect them from being contaminated. I think this would be a tremendous help in water quality for the entire state.

Thank you for listening.

COMMENTER 202: Patrick Smith, Public Works Director, City of Menville**Date Received:** February 18, 2026, e-mail**Comment:****water impairment**

1 message

Menville Public Works <publicworks@wiatel.net>
To: IRcomment@dnr.iowa.gov

Wed, Feb 18, 2026 at 10:25 AM

I wanted to comment on this subject because I'm a water and wastewater guy. my frustration is that municipal wastewater facilities operate under strict parameters, construction run off is heavily regulated, requiring DNR permitting. while agriculture (the 8 million pound elephant in the room) operates largely unrestricted(I'm not talking about livestock operations). I'm an avid outdoorsmen, I hunt, fish, boat and kayak and camp, so i notice when farmers change the land. I've seen countless groves of trees along creeks ripped out, water way strips in fields tilled under and planted, terraces on steep land removed for production. when I drive by after heavy rain you can see the trenches cut by the run off, the soil loss (and any nitrogen) is staggering. I've been on bridges here in Woodbury county, after heavy spring rains, watching the muddy run off, and the smell coming off the water is strong with fertilizer. I've kayaked the Little Sioux river and was amazed how the land was farmed, right to the very edge of the river bank. With out buffer strips along water ways in fields, along creeks and rivers, the hope of improving the waters of the state remains fleeting. Thank you for your time.

Patrick Smith

**COMMENTER 203: Richard Packebush, private citizen****Date Received:** February 19, 2026, e-mail**Comment:****Impaired Waterways**

1 message

RICHARD M PACKEBUSH Owner <packebush@q.com>
To: IRcomment@dnr.iowa.gov

Thu, Feb 19, 2026 at 9:08 AM

To Whom in Charge,

This is a major ongoing issue that continues to grow and creates serious problems for the public The problem needs to be addressed immediately with direct government controls and enforcement. The biggest abusers causing the problem is the Iowa Farmers. Think of the pollution they create to our air and water quality with the application of fertilizer, herbicide, insecticide, and especially animal manure (beef, swine and poultry). Most all of these products listed are over applied leaving the unused balance to contaminate our waterways and air. And Big Ag suppliers reap the financial harvest.

Question: Why do you think Iowa is the leading state for cancer, especially those relating to lung and blood issues??? Most have been linked back to polluted air and water quality.....

I can personally relate to these issues. I grew up on farm, worked in an Ag-business supply center selling and applying farm chemicals and have Chronic Lymphocytic Leukemia (CLL). Unfortunately, everyone feels sympathetic for the poor Iowa Farmer. Which is a poor excuse to allow no control... word picture: "It would be like letting certain individuals drive a 125 mph on our highways". Deadly!!!

Sincerely,
Richard Packebush
Lake Park, Iowa

COMMENTER 204: Janet Nelson, private citizen

Date Received: February 19, 2026, e-mail

Comment:

Water Quality

1 message

Janet Nelson <beccaben7@gmail.com>
To: IRcomment@dnr.iowa.gov

Thu, Feb 19, 2026 at 11:15 AM

I live in rural Iowa surrounded by farmland, to me it's obvious why Iowa is having water quality issues. To start, farmers have been removing all forms of vegetation from their land other than corn/beans. Gone are the windbreaks, fence rows, native grasses. Even the road ditches are now void of diversity as without fences they are easily mowed. When the Iowa wind blows the soil now goes with it, including all the farm chemicals within it. These chemicals end up in the creeks, streams, towns and eventually our lungs and drinking water! I hear constantly in the media about all the conservation practices farmers have implemented but in reality, if you look around very little is being done. Where are all these no-till fields, cover crops, wetlands? Why are farmers allowed to tile as much as they do, plant right up to a water way and apply anhydrous in the fall! My understanding is anhydrous shouldn't be applied in the fall unless at a minimum soil temperatures are below 50 degrees, it's not difficult to see this isn't always happening. I hear farmers complaining about all the regulations they have to follow nowadays, but in reality, once back on the farm they do what they want. It's so obvious why Iowa has water quality problems and high cancer rates and it's laughable that our politician's on both sides choose not to admit it! Polluted waters and the cancer rate in Iowa will never be reduced if we don't point out the actual problem, farmers! They apply the chemicals, tile the fields, cut down the trees. Do not try to fix the problem with taxpayer dollars, the farming industry has the money to fix this problem! Now's the time, the world has a glut of corn/beans due to increased competition from other countries! The only way to fix this problem is to reduce the amount of corn/beans produced in Iowa and replace it with actual beneficial conservation practices! Unfortunately, this will never happen as the agriculture industry in Iowa has become too powerful and politicians on both sides need its political contributions.

COMMENTER 205: Brian Driggs, private citizen

Date Received: February 19, 2026, e-mail

Comment:

Iowa Water Pollution

1 message

Brian Driggs <brian.driggs@gmail.com>
To: IRcomment@dnr.iowa.gov

Thu, Feb 19, 2026 at 4:57 PM

To whom,

Four years ago, I moved to Iowa City from Phoenix, in part because I thought access to so many public waterways would make up for the appalling lack of public lands here. Imagine my surprise, upon landing, to learn most waterways are riddled with toxins, thanks to farmers.

There's almost as much bullshit in the water as there is in the talking points pushing back against any kind of common sense mitigation. You know it. I know it. Everybody knows it.

Our water is poisoned every day by FARMERS who consider it their "god-given right" to do whatever the hell they want on their land. These people are willfully poisoning the rest of us because we couldn't possibly inconvenience them by forcing them to *literally* keep the shit on their own land.

People in Arizona have been preparing for armed conflict around water rights for a decade.

People in the Gulf of Mexico have known IOWA is the single largest contributor to the dead zone for just as long if not longer.

Today Iowa is framing this as minor inconvenience to a small cohort of extremists. The reality is, Iowa farmers are responsible for poisoning their neighbors and killing entire industries downstream. At some point, somebody's going to have to answer for that.

I, for one, am sick of being lectured "ANF" by wealthy landowners, most of whom don't even actively farm, themselves, as if the reason my family ate today is because ethanol and pork.

Iowa

COMMENTER 206: Brice Broz, private citizen

Date Received: February 20, 2026, e-mail

Comment:

Water Troubles

1 message

Brice Broz <brozbrice@gmail.com>

Fri, Feb 20, 2026 at 7:16 AM

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

Good morning Iowa DNR,

I understand that we have troubling levels of nitrates in our water way systems, specifically within our Iowa river systems.

There may be a simple solution to this problem of utilizing nature's eco engineers up stream in these problem water ways. Yes, by eco engineers I do mean beavers. Simply boost beaver populations/activity in upstream water ways.

Allow them to gain foothold with their activities, AKA dam building. The dams create wetlands and/or ponds, the slowing of the water flow can create conditions for... microbial denitrification. Allow the bacteria to transition nitrates to nitrogen gas. A pre-filter prior to Iowa's major population centers.

Not only will the slowing of water assist the filtration of nitrates. They can also provide reduced erosion, more wetland habitats that bolster other species, mitigate drought, flood control, and wildfire resistance.

I envision that boosting the beaver population among these water ways only hold net positives. Just an idea to add to whatever solution board that may exist out there.

I myself have been in Iowa since 2021, I've witnessed first hand Iowa's water supply year after year since then continue to worsen.

Let me know if you have any questions.

Sincerely,

Brice Broz, MS, LAT, ATC

COMMENTER 207: Jennifer Proctor, private citizen

Date Received: February 23, 2026, e-mail

Comment:

Mandate testing at all points in our water system

1 message

Jennifer Proctor <jennifer.proctor6942@gmail.com>

Mon, Feb 23, 2026 at 4:27 PM

To: lrcomment@dnr.iowa.gov

As an Iowan for the past 25 years, I am concerned that the practices of agriculture over the same time frame of recommendation has not been successful. My children are graduating from high school and college and may choose to leave a state that has not taken the safety of its citizens seriously. We must make clean water a priority and require like our neighbors to the north mandated practices to protect our communities from cancer and other diseases. Farmers should be required to participate as well as be given financial resources to meet the requirements.

Iowans want to stay but if nothing changes, we can't expect different results!

Jennifer Proctor 6942 Brookview Dr Urbandale 50322

COMMENTER 208: Karolyn Knoll, private citizen

Date Received: February 23, 2026, e-mail

Comment:

For public comment

1 message

Karolyn Knoll <karolyn.knoll@gmail.com>
To: IRcomment@dnr.iowa.gov

Mon, Feb 23, 2026 at 5:45 PM

Hello,

I believe there is a more sustainable path forward for farmers, but it's unfortunately going to take time to catch on. If wool/fiber pellets could be added to fields, they would be slow release nitrogen and sufficiently reduce nitrates in our Iowa water supply.

Best,
Karolyn Knoll
21901 V Ave
Dallas Center, IA 50063
(626) 840-4023

COMMENTER 209: Russ Ver Ploeg, private citizen

Date Received: February 24, 2026, e-mail

Comment:

My comment on water quality

1 message

Russ Ver Ploeg <rvp@verploegarch.com>
To: "IRcomment@dnr.iowa.gov" <IRcomment@dnr.iowa.gov>

Tue, Feb 24, 2026 at 8:06 AM

I hate that Iowa has some of the most polluted surface water in the country. It should be fixed by legislation and adequate funding. We are well past the time for comments and studies. With 80% of our pollutants coming from the agricultural industry, the solution has to start with them, regardless of how powerful their lobby is.
Sent from my iPhone

COMMENTER 210: Mary Mitchell, private citizen

Date Received: February 24, 2026, e-mail

Comment:

To much nitrites in our water!

1 message

Mary Mitchell <mitchmary0210@gmail.com>
To: IRcomment@dnr.iowa.gov

Tue, Feb 24, 2026 at 9:08 AM

It is very concerning that there are so much nitrites in the water! You are supposed to drink water to be healthy and yet you drink Iowa water you take a chance of getting cancer! Why isn't something being done about it! They say that a lot of it comes from farming run off of fertilizer and manures. They should make the farmers use something that is more natural, but still effective. Farmers are poisoning the people that live here. It's robbing Peter to pay Paul! I worry for my grandbabies. Something just REALLY needs to be done. taxes are higher here than a lot of place and yet we have to worry about a simple thing of drink a glass of water.

COMMENTER 211: Ron McConnell, private citizen

Date Received: February 24, 2026, e-mail

Comment:

Iowa rivers
1 message

Ron McConnell <ronmcconnell10@gmail.com>
To: IRcomment@dnr.iowa.gov

Tue, Feb 24, 2026 at 1:27 PM

Nitrates are ruining our water quality a little more each year. Why do we always wait until things are at their worst before doing anything about it?

COMMENTER 212: Kevin Eicher, private citizen

Date Received: February 25, 2026, e-mail

Comment:

Public input on improving water quality
1 message

Kevin Eicher <kevineicher60@gmail.com>
To: IRcomment@dnr.iowa.gov

Wed, Feb 25, 2026 at 5:31 AM

Thank you for seeking public input on improving Iowa's rivers and lakes.

I encourage the DNR and Legislature to look closely at Minnesota's watershed model. Minnesota has combined:

- Dedicated, stable clean water funding
- Watershed-based planning that crosses county lines ("One Watershed, One Plan")
- Clear, measurable water quality benchmarks
- Transparent public reporting of progress

This coordinated, watershed-scale approach provides structure, accountability, and long-term funding stability.

Iowa has strong farmers and conservation professionals. What we need is better alignment, measurable outcomes, and sustained investment at the watershed level.

Please consider adapting key elements of Minnesota's model to accelerate meaningful water quality improvements in Iowa.

Thank you for your work.

COMMENTER 213: Douglas Pedersen, private citizen

Date Received: February 25, 2026, e-mail

Comment:

water quality

1 message

Douglas Pedersen <ddped52@gmail.com>
To: IRcomment@dnr.iowa.gov

Wed, Feb 25, 2026 at 9:35 PM

I am writing to say that I think water quality is a major issue for Iowa. Where candidates stand on water quality will affect who I vote for in all future elections.

I feel that all farmers that farm near an active stream, creek or river be required to have filter strips and other means of preventing erosion and surface runoff.

Governor Reynolds says that our land owners are taking care of our water quality and that is simply not true. I own land and I am doing all I can to protect the water that falls on my land and prevent erosion. I travel in every quarter of Iowa and I could show you field after field where nothing is being done to prevent run off.

My message is water quality needs to be a primary issue for all Iowans.

Thank you

Douglas Pedersen

COMMENTER 214: lyla yost, private citizen

Date Received: February 27, 2026, e-mail

Comment:

water quality

1 message

lyla yost <lylayost@gmail.com>
To: IRcomment@dnr.iowa.gov

Fri, Feb 27, 2026 at 4:21 PM

If the state planted sawgrass near streams and rivers, we could naturally remove nitrates and also stop erosion. Sawgrass also sequesters carbon. When mowed, sawgrass can be used as hay or it can be sold to make Ethanol. It would be a win/win for Iowa !! For stagnant ponds full of algae, plant water lilies.

It is time that Iowa becomes more proactive in things we can do to improve water quality !!

COMMENTER 215: Mike, NW Iowa, private citizen

Date Received: March 8, 2026, e-mail

Comment:

Clean Water Draft Iowa DNR

1 message

sanbornia@aol.com <sanbornia@aol.com>
To: IRcomment@dnr.iowa.gov

Sun, Mar 8, 2026 at 1:10 PM

As my family and friends battle cancer and die from it. You want the public's comments on your plan. Guess it's some type of joke.

R Governor - R senate - R house

What are they doing? Absolutely the bare minimum or nothing. Put a crony in charge of the DNR, ignore all the studies that say the waters are polluted (thank a farmer), listen to the Iowa Farm Bureau and Big Ag, and nobody else. Lower the fines or give them a slap on the wrist. Dump tons of manure into our rivers and lakes. Really a sick way to take care of your own citizens!

Constantly Disappointed

Mike
NW Iowa

p.s. Don't eat the fish or drink the water
If there is blue green algae at you favorite
public beach don't swim in it!!! Or let your
dog swim in it!!

COMMENTER 216: Nicole Dickenson, private citizen

Date Received: February 23, 2026, e-mail

Comment:

Clean up our waters

1 message

Nicole Dickenson <n.dickenson25@palmer.edu>
To: "ircomment@dnr.iowa.gov" <ircomment@dnr.iowa.gov>

Mon, Feb 23, 2026 at 1:13 PM

The water quality in our state has never seemed worse to me. This is unsustainable and the number 1 reason my family will not be living here in five years. I grew up in Iowa, swimming in the river (probably against better judgement), enjoying the outdoors, but now with a little one I can't recreate in the water, let alone feel like we can safely drink it. We've installed expensive filtration systems in our home to try and make the situation feel better, but how many folks can actually afford that? There has to be better solutions to making our water safe for all of us and help drive down the increasing cancer rates. I'd vote for anyone who would make that a priority in Iowa.

I don't know who this comment is for, but I just pray we can find a way to fix this for the generations to come.

A worried mother,

Nicole Dickenson

DeWitt, IA

COMMENTER 217: Kevin Kenny, private citizen

Date Received: February 25, 2026, e-mail

Comment:

Iowa Water and Land Quality

1 message

Kevin Kenny <cypressacres@gmx.com>
To: IRcomment@dnr.iowa.gov

Wed, Feb 25, 2026 at 9:55 AM

I am sure my opinion on pollution of Iowa's ecological systems will have no sway with the Iowa DNR but I feel that I must at least try to make my voice heard. After moving to the Des Moines area about two years ago I quickly found out how bad the drinking water is in the community as a result of the nitrate run off to the Des Moines River, and now it appears that the problem is continuing even into the winter months which has not happened before. This should be a giant red flag that drastic measures are needed to stop the continued polluting of our water and land in Iowa.

I feel that this problem is a direct result of the greed and the grip that large corporations such as the ethanol industry, the corporate farm lobby, big chemical companies, and big seed manufacturers have over our agriculture in the state.

Nitrogen should be banned from use on all farm fields in Iowa and the farm community should revert back to a strict policy of proper crop rotation every year including the past wide spread use of federally funded CRP programs. This unbridled overuse of nitrogen so that fields can be planted with corn year after year to supply the ethanol industry must be ended. The people of Iowa are not the only ones that suffer the consequences of nitrate pollution as evidenced by the "dead zone" at the mouth of the Mississippi river. I am sure communities all along the Des Moines and Mississippi rivers would benefit ecologically and economically as a result of nitrate reduction.

In my opinion if the state of Iowa has to reduce corn production (and nitrogen use) where ethanol plants can't be supplied with enough corn, then the ethanol industry should be shut down or at least downsized sufficiently to lessen the non-food need for massive amounts of corn. On another related topic I can't believe the stupidity of our government in allowing a "carbon pipeline" to be constructed across our state to help expand the ethanol industry. Apparently greed has clouded the memories of all involved of something learned in basic science class that carbon dioxide is not a pollutant but rather is a nutrient to plants and those plants in turn change the carbon dioxide into oxygen for the benefit of air breathing mammals.

After living the water quality nightmare in Des Moines I have stopped purchasing any ethanol containing gasoline for all my vehicles and lawn equipment and will continue this practice from now on.

Sorry for the rant, but I feel it is my civic duty to at least put in my two cents worth on the downfall of Iowa's overall environment. And don't get me started on the total ruination of overall food quality in this country with the carcinogenic infusion of glyphosates on all grain produced in this country. We now find ourselves searching for the least contaminated bread, and other grain products available at the store. Is it any wonder that glyphosate use in most European countries is banned?

COMMENTER 218: Kay Vifian, private citizen

Date Received: March 19, 2026, e-mail

Comment:

Iowa's Impaired Waters List

1 message

Kay Vifian <naturehavenfarm@gmail.com>
To: "IRcomment@dnr.iowa.gov" <IRcomment@dnr.iowa.gov>

Thu, Mar 19, 2026 at 8:24 PM

I am writing to express my concern about the current state of water quality in Iowa's streams, rivers and drinking water and the high proportion of assessed water sources that have been designated as impaired. I believe that Iowa's ranking as 2nd highest age-adjusted rate of new cancers in the nation is directly related to the amount of chemicals and fertilizer that are applied to soil on farms and chemicals applied to non-farm sites. These chemicals kill soil life that provide nutrients to crops and livestock. Water runs off these depleted soils carrying increased nitrogen and chemicals to our waterways. We are consuming water, meat, eggs, dairy, and fruits and vegetables that have decreased nutritional value and increased levels of chemicals.

I am advocating for increased monitoring by DNR staff of runoff from agricultural land, stricter enforcement of regulations, restoring funding for the Iowa Quality Information System's water quality monitors, and working with farmers to initiate more regenerative agricultural practices starting with installing buffer strips between row crops and waterways.

Thank you,
Kay vifian

COMMENTER 219: Pat Hayes, private citizen

Date Received: March 17, 2026, e-mail

Comment:

Water quality.

1 message

Pat Hayes <wwnativeseeds@gmail.com>
To: IRComment@dnr.iowa.gov

Tue, Mar 17, 2026 at 10:16 PM

The water in our state streams and rivers is terrible shape. One of the first steps to rectify this would be to completely ban little the application of manure on frozen and snow covered ground. That's a no-brainer.

Thank you
Pat Hayes
Sent from my iPhone

COMMENTER 220: Patricia Bowen, private citizen

Date Received: March 17, 2026, e-mail

Comment:

Protect our Waterways

1 message

Pat Bowen <patjbowen@gmail.com>
To: IRComment@dnr.iowa.gov

Tue, Mar 17, 2026 at 12:20 PM

To whom it may concern:
I have been aware of water quality (or lack of it) for many years. Now that the public is becoming more aware of it too it seems like government bodies that are to protect our environment such as the DNR and the EPA are choosing to use a sleight of hand by saying they aren't really impaired.

Everyone knows Iowa has impaired, filthy dirty water. Turning a blind eye to protect some people from making more money and allowing pollution to continue is not what the DNR is supposed to be doing. The American Rivers has said the Mississippi is the most endangered river in the US.

Also a proposed Study bill 657 is not in line with protecting the people of this state. To determine what percentage of excrement came from what animal in a polluted river before it could be added to the list of impaired waterways is kicking the can down the road and would be expensive and likely result in violations of the EPA's minimal requirements for drinking water. I don't CARE what animal excrement is polluting the water. Clean it up!

Please prove me wrong, I keep telling people when they ask "what does DNR mean". I say "Do Nothing Really"

Sincerely concerned for the future of our state,
Patricia Bowen 1210 Village Road Iowa City Iowa 52240

COMMENTS 221: Joni Hutchinson, private citizen

Date Received: March 16, 2026, e-mail

Comment:

Impaired Waters Comment

1 message

Joni Hutchinson <jonihutchinson1@gmail.com>
To: ircomment@dnr.iowa.gov

Mon, Mar 16, 2026 at 11:32 AM

I am submitting this comment regarding the Draft 2026 Integrated Report and the Section 303(d) Impaired Waters List.

As an Iowan, I find the condition of our state's water extremely alarming and unacceptable. The data presented in this report show that hundreds of our rivers, lakes, and streams are impaired and require restoration plans, while the vast majority of waters remain unassessed due to limited monitoring. This reality should concern every resident of this state.

Water is not a luxury resource. It is fundamental to human health, ecological stability, agriculture, recreation, and the long-term economic vitality of Iowa. Yet the continued listing of hundreds of impaired waters demonstrates that the current pace of improvement is far too slow!!

Families should not have to question whether the lakes their children swim in, the rivers flowing through their communities, or the groundwater they rely on are safe.

Iowans deserve stronger accountability and measurable progress. The public expects clear **action** to address the sources of pollution, transparent **reporting on improvements**, and **policies that prioritize the protection and restoration** of our waters. Continued monitoring is important, but monitoring alone does not fix impaired waters.

COMMENTS 222: Judson Barr, private citizen

Date Received: March 16, 2026, e-mail

Comment:

Iowa water Comment

1 message

Jud Barr <judbarr@netins.net>
To: ircomment@dnr.iowa.gov

Mon, Mar 16, 2026 at 2:16 PM

I cannot begin to understand why I have to pay to cleanup my drinking water that someone else dumps fertilizer and manure into.

Judson Barr
224 52nd St
[Des Moines 50312](#)

COMMENTER 223: Jeff Chungath, private citizen

Date Received: March 16, 2026, e-mail

Comment:

Public Comment: 2026 Draft Integrated Report on Water Quality

1 message

Jeffrey Chungath <chungath@yahoo.com>

Mon, Mar 16, 2026 at 10:45 AM

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

To Whom It May Concern:

As an Iowan who values our state's natural heritage and spends significant time exploring our outdoor spaces, I am writing to express my deep concern regarding the current 2026 draft water quality assessments and the overall direction of water management in our state.

1. Restoring Data and Accountability

First, the decision to eliminate the \$500,000 in funding for the water monitoring program at the University of Iowa has left us strategically blind. We cannot solve a problem we refuse to measure. The current attitude of "what you don't know won't hurt you" is a disservice to every citizen. I urge the legislature to restore and expand this funding to ensure we have a state-of-the-art, real-time understanding of what is in our water.

2. A Crisis of Access: Record Beach Closures

The impact of under funding and understaffing at the DNR is no longer theoretical—it is visible at our shoreline. The summer of **2025 was the most "un-swimmable" summer on record** in Iowa history. With a record-breaking **158 beach advisories** for E. coli, nearly 70% of our state-monitored beaches were deemed unsafe at various points. When families in the Des Moines metro and across the state cannot safely visit spots like Big Creek or Easter Lake because the water is a health hazard, the system is fundamentally failing.

3. The Real Cost of Pollution: Fish Kills

The criteria for "listing and de-listing" impaired waters often feel arbitrary, seemingly designed to mask the lack of progress. While the state's data might show "zero change" in impaired bodies, the physical reality is devastating. We are still reeling from the **March 2024 East Nishnabotna River disaster**, where a single fertilizer spill killed an estimated **800,000 fish** over 60 miles. This was the 5th largest fish kill in our history, yet the resulting settlement and oversight feel wholly inadequate to prevent the next catastrophe.

4. Protecting Our Trust

In recent years, we have seen proposals that would not only defund monitoring but also attempt to reverse the constitutional amendment that created the **Natural Resources and Outdoor Recreation Trust Fund**. These actions run counter to the clear will of Iowans. We need an Iowa Farm Bill with teeth - one that includes mandatory, robust provisions for soil and water quality rather than relying solely on voluntary strategies that have failed to move the needle for a decade.

I do not believe the 2026 draft report provides an adequate picture of Iowa's water quality. If we were truly committed to clean water, we would honor the **3/8 of a cent sales tax** approved by 63% of voters in 2010. This would add approximately **\$250 million annually** to the Natural Resources and Outdoor Recreation Trust Fund—a necessary investment to begin a long-term, multi-billion dollar effort to restore our waterways.

Iowans are tired of "finger-pointing" and "data-skewing." We want the clean water we were promised and the funding we already voted for.

Sincerely,

Jeff Chungath
345 42nd. St.
Des Moines,
IA 50312

COMMENTER 224: Russ Ver Ploeg, private citizen

Date Received: March 16, 2026, e-mail

Comment:

Iowa's water quality

1 message

Russ Ver Ploeg <rvp@verploegarch.com>

Mon, Mar 16, 2026 at 11:15 AM

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

How much talk, study, and research of Iowa's excessively polluted water ways is necessary before effective action is taken? FINALLY put Iowan's health and well-being ahead of Farm Bureau member's profits. If we are interested in Iowa's economic development, we're not just an embarrassment nationally. New residents and visitors to Iowa are staying away.

-Russ Ver Ploeg, Des Moines

COMMENTER 225: Loree Miles, private citizen

Date Received: March 16, 2026, e-mail

Comment:

Water Quality Comments

1 message

Loree Miles <Loree@thewhitehousefarm.com>

Mon, Mar 16, 2026 at 11:15 AM

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

To whom it may concern;

I am writing today to express not just my concern but my panic over the health issues research is showing in Iowa. The nationally high rates of cancer, particularly in young people and in women is worthy of much further investigation. But, that is not the purpose of the DNR or this letter.

However, when Iowan's lives are clearly affected abnormally it seems prudent to look at the common factors that affect all of us.

Certainly air and water quality should be at the top of the list!

The fact that hundreds of organizations are spending money and time on research to figure this out should be of some comfort but why isn't the government of the State leading this effort and standing up to turn over every rock to find the answers?

Monitoring our water sources for known contaminates should be at the top of the list. Eliminating funding for the water quality monitoring is completely wrong headed. It is fractionally insignificant in the budget but the finding could be enormous! What have you to hide?

It would seem you already know what it will find and that will reflect poorly on those who run our state but shouldn't the current leaders want to know so they can be the heroes and do something about it?

Shrinking the DNR by cutting the budget, no longer funding the water quality monitoring, listing and delisting contaminated rivers and streams arbitrarily, and a refusal to push WILL, which was voter approved over 10 years ago, do not seem like good stewardship measures. They seem short sighted and not in the best interests of Iowans.

It is past time to do the right thing. I think the voters in Iowa have become aware of that.

Respectfully,

Loree Miles

19548 T Ave

Dallas Center, Iowa. 50063

515-490-7145

loree@thewhitehousefarm.comaffected

COMMENTER 226: Gregory Wery, private citizen

Date Received: March 17, 2026, e-mail

Comment:

Comment on our Iowa rivers declining water quality

1 message

Greg Wery <gwbirddog@gmail.com>
To: IRcomment@dnr.iowa.gov

Tue, Mar 17, 2026 at 9:54 AM

I've been an Outdoorsman for 50 plus yrs in Iowa and have witnessed the ongoing decimation of our water & natural resources due to the farming practices or lack of farming with the future of our environment in mind.

Our state leadership has turned on blind eye for years on what Iowa's farmers are able to do and only has an eye on ethanol production & the \$\$ created as its outcome.

Until the people in a mass quit allowing this most important issue to move from just talk to some resolutions nothing changing for Iowa's filthy rivers & Iowa's growing Cancer rates leading this nation.

At the minimum ag practices need to be mandated to regulate the amount of Pesticides, fungicides & fertilizer farmers can legally apply in a season. As well as mandating a buffer strip of a certain width along all rivers & streams to eliminate the immediate flow of field runoff. No more farming from shore to shore. To avoid excess runoff we need to have state oversight as to how much a farmer can tile any section of land. This along with the regulatory need for controls on the application of manure to frozen ground within a certain distance of a waterway.

Lastly we need a change in how Farmers/feed lots/Corporate farms & Ag Business are reprimanded for catastrophic fish kills and environmental disasters to our land, wildlife, rivers & streams. We need to end the miniscule fines of a few thousand dollars for destroying miles of streams, ecosystems or 60 miles of rivers. There needs to be a significant financial impact on carelessness to the environment, carelessness that has an immediate and long term impact on waterways, Iowans and the environment.

In conclusion, yes for most Iowans this subject is "out of sight, out of mind" but for this Iowan I spend time hunting, fishing or hiking multiple times a week all year long. I witnessed first hand the early March Algae blooms below the spring pool at Richmond springs in Backbone state park. I've witnessed the Cedar / Wapsie & Iowa river water clarity difference from late November to early spring compared to the months of May thru October when the farmers are actively disrupting the earth. I've witnessed the biggest and best fishing holes in the aforementioned rivers contaminated with floating feedlot manure all summer long.

Yes we have a huge environmental issue with our rivers, it's great to see the increased focus on the issue. This Iowan's hope is that with Iowa's stats on Cancer rates we do more than talk and kick the can down the road, we act and react for a much better Iowa !

Gregory Wery
319-404-2322

COMMENTS 227: David W. Miles, private citizen

Date Received: March 17, 2026, e-mail

Comment:

Comments on 2026 Iowa Integrated Report (Water Quality)

1 message

Dave Miles <dmiles@manchestertory.com>

Tue, Mar 17, 2026 at 11:21 AM

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

Thank you for the opportunity to comment on the draft 2026 Integrated Report. While the data is extensive and technically sound, its implications are more serious than the report acknowledges.

The persistence of widespread impairment—hundreds of waters failing standards—signals a systemic failure of current policy, not merely a monitoring result. Stable impairment levels over time suggest that voluntary, incremental approaches are not working.

The report's distinction between "impaired" and "unsafe" is misleading. Many listed waters require costly treatment to meet drinking water standards and experience episodic nitrate and bacteria spikes that pose real public health risks. Compliance at the tap often masks upstream failure.

The data clearly identifies agricultural runoff as the primary driver of impairment. Continued reliance on voluntary measures misaligns incentives, delays progress, and shifts costs to municipalities and ratepayers. At minimum, the report should link impairments to probable sources, recommend watershed-level accountability, and connect listings to enforceable outcomes rather than planning frameworks.

The report also understates the central barrier to progress: lack of sustained funding. In 2010, voters approved the Natural Resources and Outdoor Recreation Trust Fund, to be funded by a 3/8-cent sales tax. More than a decade later, the fund remains inactive due to legislative inaction. This is not a marginal issue—it is the most significant gap in Iowa's water quality strategy. The Trust Fund could generate \$150–\$170 million annually, and its absence undermines the credibility of current efforts.

The DNR should clearly state that current funding is inadequate, that activation of the Trust Fund is necessary for measurable improvement, and that continued reliance on underfunded voluntary approaches is unlikely to change outcomes. Without this clarity, the Integrated Report risks remaining a diagnostic document without a realistic path to resolution.

The report should also incorporate high-frequency monitoring data, prioritize watersheds based on human health risk and drinking water impacts, and establish time-bound targets for removing waters from impairment lists.

Iowa has clear data and has identified the sources of pollution. What is missing is alignment between science, policy, and funding. Until that alignment occurs—particularly through activation of the Trust Fund—meaningful water quality improvement is unlikely.

Regards,

David W. Miles

COMMENTER 228: Jackie Stolze, private citizen

Date Received: March 16, 2026, e-mail

Comment:

Pollution Report Public Comments

1 message

Jackie Stolze <jackiejoyhstolze@gmail.com>
To: IRComment@dnr.iowa.gov

Mon, Mar 16, 2026 at 8:36 AM

Please accept my public comments on the impaired waters report:

More than 700 Iowa waterways at Category 4, and 574 at Category 5 -- this should be a wakeup call for Iowans to do something about the impaired state of our waterways. Both nitrates and bacterial pollution are at serious, health-threatening levels for humans as well as wildlife.

The data are clear. They're telling us to change our practices and take water quality seriously and take action to improve this situation.

Jackie Stolze

COMMENTER 229: Eric Doll, PLA, CPSI, Park Planner, Parks and Recreation, West Des Moines

Date Received: March 16, 2026, e-mail

Comment:

2026 Impaired Waters

1 message

Eric Doll <eric.doll@wdm.iowa.gov>
To: "IRcomment@dnr.iowa.gov" <ircomment@dnr.iowa.gov>

Mon, Mar 16, 2026 at 8:46 AM

As a City of West Des Moines Employee, and a resident of West Des Moines, it is clear that Raccoon River is severely impaired. I wouldn't let my family swim or recreate in these waters due to the pollution. Furthermore, as my job is to provide quality of life and recreation opportunities in West Des Moines, it is disheartening to provide boat access projects and greenway improvements along waterways which are so degraded. And there just doesn't seem like anything we can do other than put up signs that say 'swim at your own risk' and stuff like that. So unfortunate.

Eric Doll, PLA, CPSI

Park Planner | Parks and Recreation

4200 Mills Civic Parkway | P.O. Box 65320

West Des Moines, IA 50265

P: 515-222-3447

E: Eric.Doll@wdm.iowa.gov

wdm.iowa.gov/ParksandRec

COMMENTER 230: Erin Kelly, private citizen

Date Received: March 13, 2026, e-mail

Comment:

Union Grove Lake

1 message

Erin Kelly <erinkelly323@gmail.com>
To: IRcomment@dnr.iowa.gov

Fri, Mar 13, 2026 at 2:01 PM

Our family would request this body of water is taken care of and nitrates and other concerns are addressed ASAP. Our autistic daughter's greatest joy is swimming, and she doesn't always understand not to get ANY of the water in her mouth! We enjoy the surrounding park as well. This is important to me and my family. Please make Union Grove Lake's water as safe as possible, as soon as possible!

Erin Kelly
Marshalltown

COMMENTER 231: Paul Uzel, private citizen

Date Received: March 13, 2026, e-mail

Comment:

Water Quality Study

1 message

Paul Uzel <uzeldansen@gmail.com>
To: IRcomment@dnr.iowa.gov
Cc: "Kerri Johannsen, Iowa Environmental Council" <iecmal@iaenvironment.org>

Fri, Mar 13, 2026 at 4:02 PM

I've viewed the online DNR website piece about the 2026 draft list of impaired waterways. The best two parts are the map and the results for Dubuque County. Despite there being many waterways shaded red, the lack of specific locations (only 2 and one not even red) is encouraging. But I am presuming that the Party shaded waterways without red dots are less problematic.

As usual, reports submitted for public comment are 'digestible' with considerable study and professional expertise and time, all three of which I have little, despite my high level of concern. So I cannot comment on data accuracy or how you have completed (or are completing as this work is never 'finished') the list.

What can DNR DO, or what can we citizens do? I believe we can study "til the cows come home". But I will work for legislators who will empower and fund DNR to rapidly address these issues. I will continue to subscribe to organizations that will hold government, including DNR responsible. And I will do what I personally can do living on a very small plot of land in the City of Dubuque between US 20 and Univ. of DBQ to do environmental remediation, including composting, not using lawn chemicals, converting lawn to LOW prairie grass on my postage stamp sized lawn, and diverting as much as possible from the landfill.

Please hold the large industrial sources of environmental pollution accountable and we citizens will work for laws to enable you to do just that, whether the problem is CAFOs, aggressive agricultural industrial companies and industrial farmers or simply users using the environment scornfully.

I have personally worked in both state and federal bureaucracies and know that low and middle level folk are committed to 'the cause', no matter how politically connected top level folk are. Please remember that we, the public, in this semi-democratic state ARE watching and WILL vote.

Thank you for the hard work you do.

Paul Uzel
61 N. Algona St.
Dubuque, 52001-5602

COMMENTER 232: Roger L White, private citizen

Date Received: March 15, 2026, e-mail

Comment:

Response to Impaired Waters of Iowa Report

1 message

ROGER White <rogerwhite114@gmail.com>

Sun, Mar 15, 2026 at 9:35 PM

To: IRcomment@dnr.iowa.gov

Iowa's rivers, streams, and lakes are polluted and are getting worse. Whether it is nitrates, bacteria, chemicals, sediment or other pollution, our surface water is in need of greater protection. The evidence is overwhelming: Cities have to use extreme treatment methods to remove nitrates and other contaminants in order for water to be safe to drink, public beaches are closed due to bacteria contamination, flowing water carries so much sediment that the water is an ugly brown - not clear, manure and chemical spills cause fish kills and make stream segments unfit for aquatic life to survive, and at times, the water stinks because of contamination. Surface water is not safe for recreation or human food supply. Cancer is rampant in Iowa.

The Department of Natural Resources is doing too little and is too ineffective in protecting our essential flowing and standing surface water. While the details in the new Report are difficult to understand for a lay person, the environmental evidence is clear and convincing that more vigorous monitoring, enforcement and especially clean up are necessary. Any report that does not declare this is, itself, inadequate.

Thank you.

Roger L White
Cedar Falls, Iowa

COMMENTS 233: Erich Kretzinger, Chairman, Boone County Board of Supervisors

Date Received: March 13, 2026, e-mail

Comment:

Comment on Draft 2026 List of Impaired Waters in Iowa, especially The DSM River north of Boone

1 message

Erich Kretzinger <ekretzinger@boonecounty.iowa.gov>
To: "IRcomment@dnr.iowa.gov" <IRcomment@dnr.iowa.gov>

Fri, Mar 13, 2026 at 1:35 PM

Dear Iowa DNR friends,

I am providing comment on the draft 2026 list of impaired waters in Iowa, as required by Section 303(d) of the federal Clean Water Act.

My specific concern is with the section of the Des Moines River north of Boone, from Boone to Fraser. This is personal for me and my family, as we now have three generations spending time together fishing and wading this section of the river. It is very disheartening to know that we are no longer safe to enjoy a peaceful pastime with each other away from screens and other distractions in a messed up modern world. The now highly impaired Des Moines River through Boone County and elsewhere deserves to be addressed at the highest levels to ensure at least one wholesome activity that connects generations of Iowans can continue and be shared with future generations as well. We pay for fishing licenses each year to help make sure this wonderful fishery is protected and safe for consumption, which is regularly encouraged by the DNR, only to find out it has become polluted beyond our ability to safely enjoy it.

Speaking beyond my personal family connections to the Des Moines River, as a Boone County Supervisor I am fearful of the same loss for many, many of my constituents who find time on and with the river to be a regular source of highlights in their lives. Please, for their sakes and that of our future generations of outdoorspeople in Central Iowa, commit all possible resources to this and every other impaired waterway in Iowa. Having the right bait needs to be our greatest worry, not whether or not today we will be diagnosed with cancer due to trusting our water in Iowa to be safe.

Thank you for your concern and efforts to improve the Des Moines River watershed.

Respectfully,

Erich Kretzinger

Chairman

Boone County Board of Supervisors

515-433-4934 Office

515-290-1494 Mobile

<https://www.boonecounty.iowa.gov/>

COMMENTER 234: Alex Anderson, private citizen

Date Received: March 16, 2026, e-mail

Comment:

Public Comment on 2026 Iowa Impaired Waters Draft List

1 message

Alex Anderson <alex072692@gmail.com>
To: ircomment@dnr.iowa.gov

Mon, Mar 16, 2026 at 8:04 AM

Hello,

I support listing impaired segments of the Raccoon River, Des Moines River, and nearby tributaries in the 2026 Impaired Waters Report. These waterways are critical for drinking water, recreation, and aquatic life in the Des Moines metro area, and current pollution levels—particularly nutrient runoff—clearly exceed safe standards. Recognizing these impairments is an important step toward developing meaningful cleanup plans and ensuring accountability for pollution sources. I urge the Iowa Department of Natural Resources to maintain or expand impaired listings where monitoring data shows standards are not being met.

Thank you!

Alex

COMMENTER 235: Angela Tyler, private citizen

Date Received: March 16, 2026, e-mail

Comment:

Public comment on the draft waters list

1 message

Angela Tyler <tylerangela1961@gmail.com>
To: ircomment@dnr.iowa.gov

Mon, Mar 16, 2026 at 8:17 AM

I would like to recommend that Saylorville Lake be addressed. I am 50 years old and I was born and raised in the Des Moines area. Until recently my family and I swam at Saylorville Lake beaches multiple times every summer. I can't remember now how long it's been since we were able to do that. We used to have children's birthday parties there. I can't even see a time coming now where we might be able to do it again.

It's not just Saylorville Lake. I'm hard pressed every summer now to find anywhere close we can swim safely in the summer. There are pools, but they don't give us an experience with natural areas. They are also quite expensive in comparison.

I understand that drinking water safety is the first priority, as it should be. However, part of the attraction of living in Iowa is being able to enjoy our beautiful nature. These problems not only lower our quality of life, they also draw less tourism and less new citizens. We have a consistently dropping population and we are losing important tourism dollars.

Please address recreation fully in the water quality report.

COMMENTS 236: Ellen Yee, private citizen

Date Received: March 16, 2026, e-mail

Comment:

Public comments on water quality in iowa

1 message

Ellen Yee <ellenlyee@yahoo.com>

Mon, Mar 16, 2026 at 10:14 AM

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

First. when the legislators at the capital eliminated funding for the water monitoring program administered at the University of Iowa, our ability to understand our water quality was severely hampered. They're attitude of "What you don't know won't hurt you" Is completely wrong headed and needs to be reversed.

Second, when the DNR indicates the inability to test many of the waters in Iowa due to staffing shortages, it is related to the freezing and cutting of various line items at the Department of natural resources, and a lack of funding from the same legislators mentioned above. "Shrinking government so small that you could drown it in a bathtub" Does not serve the public interest.

Third, the criteria for listing and de-listing seems Arbitrary and capricious, Even though the EPA has designated specific parameters, Sampling techniques, interpretation of results, frequency of testing, strategic seasonal testing, low and high flow optional testing time can all skew the data for the purposes of "making it seem as though we are doing something" (A direct quote from Dean Lemke from IDALS about the purpose of the Iowa nutrient reduction strategy at its rollout at Iowa Farm Bureau in 2013.)

Fourth, The proposals in front of the legislature In the last few years to defund monitoring, reverse the constitutional amendment creating the natural resources and outdoor recreation trust fund, testing the E. coli in the river to verify the DNA of the particular species to whom it belongs, and the current proposal for an Iowa Farm bill that doesn't have adequate provisions for soil quality and water quality, all points to an attitude by state officials and elected representatives that they are pursuing an agenda that is counter to the Citizen of Iowa, who continually voice their opinion that they want clean water.

In Summary:

I do not believe the data as presented is an adequate picture of Iowa water quality. The fact that we have had Effectively zero change in the number of impaired water bodies Over the last 10 years indicates the need for more monitoring (which will undoubtedly raise the number of water bodies on the impaired waters list) and more action (5 or 10 times present resources) by the executive branch to reduce this list. One of the most effective indicators of a true desire to solve the problem would be to pass the 3/8 of a cent sales tax that was approved by the voters in 2010 by 62%, which now polls at 82%, Which would add \$200 million to the natural resources and outdoor recreation trust fund, an adequate start to a long-term multi billion dollar effort to make water great again.

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