

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1251**.

**Timestamp** 1/18/2013 2:40 PM

**Name** Gary Stickler Jr

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

It is very important to support these conservation projects and research for farmers. Iowa and the present population are not the only affected parties hurt by nutrient runoff. The ever growing dead zone in the gulf is affecting fishermen and other water based industry. Sediment runoff continues to fill the Mississippi as well. What future do our children have in these areas if it continues. Even at home continued nonconservation will render our land useless. Please help support funding to continue funding and science based research so future generations can continue our way of life. Gary Stickler Jr

**Name** Francis Thicke**City** Fairfield**State** Iowa**Providing comment on the following sections:**

<input type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

The science assessment of nonpoint source practices in the Nutrient Reduction Strategy (NRS) is comprehensive. However, it reveals that major changes in Iowa's agricultural practices will be required to achieve the goals of the NRS. What is lacking in the NRS is a plausible strategy for how farmers will become motivated to make those changes.

The practices listed in the NRS are not new. Farmers have had the opportunity to adopt them for years, but for the most part they have not. The reason they haven't is that the practices cost money and/or time to implement. Farmers, individually, have no economic motivation to adopt them, and the public cannot afford to pay for them.

In 2012 USDA provided Iowa landowners \$33 million in conservation funding, the latest of decades of annual conservation funding that has not shown real gains in water quality. To the contrary, the Hypoxia Zone in the Gulf of Mexico has grown larger over the decades of state and federal funding of water quality programs and projects. Moreover, anyone driving around Iowa in recent years has seen firsthand that a lot of new tile drainage has been installed across Iowa, which will likely increase the loss of nitrogen to the Gulf faster than water quality projects can make gains. The proposed \$2.4 million state allocation to implement the NRS may sound like a lot to legislators and the public, but it is a drop in the bucket of funding that would be required if the public were to fund the NRS to a level that would have a chance of achieving its goals.

A water quality strategy that could work would be to require every farm to develop and implement a farm conservation plan which would include a combination of practices from the science assessment of the NRS, which together would meet the water quality goals for that farm, and which on the aggregate would meet the water quality goals for the State of Iowa. Motivation for farmers to develop and implement their conservation plans could be through coupling conservation plans to federal subsidy programs (obviously the state cannot control that) or through direct regulatory requirements at the state or federal level.

The voluntary strategy put forth in the NRS simply defies the odds of working. As one ISU scientist -- who contributed to the science assessment of the NRS -- recently told me, "There is no scientific evidence that the NRS strategy will work."

At best, the proposed voluntary approach espoused in the NRS represents a naïve belief that farmers will now suddenly make major changes in their farming practices -- which will cost them money -- in the face of decades of evidence to the contrary. At worst, the NRS strategy could be seen to be a calculated ploy to try to buy another five years of business-as-usual agriculture under the guise of a new strategy.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1253**.

**Timestamp** 1/18/2013 2:52 PM

**Name** Kathy Rohrig

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I urge you to fund the Iowa Nutrient Reduction Strategy.

What sets this plan apart it is science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. it is not the cookie cutter, every state is the same approach, that EPA wants to happen.

I think the voluntary portion is key. Farmers are making good conservation choices and don't want to bludgeoned with overwhelming and often unnecessary regulations.

Thank you in advance for your support. Kathy Rohrig

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1254**.

**Timestamp** 1/18/2013 2:53 PM

**Name** Eugene Shelton

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. A science-based nutrient reduction strategy is the most effective way to improve Iowa's conservation. I highly recommend that you support a science-based state nutrient reduction strategy. Eugene Shelton

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1255**.

**Timestamp** 1/18/2013 3:04 PM

**Name** Todd Boss

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
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Secretary of Agriculture Northey,

Dear Sirs I am writing today to encourage your support of the Iowa nutrient reduction strategy. As you know most Iowa farmers do an excellent job of Nutrient conservation on their farms, adoption and funding of the Iowa nutrient strategy would give further incentive to producers to voluntarily implement more of these conservation practices without further statewide regulations. For example some of the voluntary practices I have implemented on my farm include crop rotation, use of green manure, use of the late spring nitrate test before sidedressing, buffer strips, and incorporating manure. Failure to support this initiative may result in more regulations in an already over regulated industry. Thanks Todd Boss

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1256**.

**Timestamp** 1/18/2013 3:05 PM

**Name** Kathleen Swenka

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

It is vital agricultural production is maintain to continue feeding our growing population. Food does not come from the grocery stores or local markets in comes from the backs of the dedicated farmers working for little pay.

Please keep conservation practices voluntary. Farmers have enough to deal with, last year's drought caused major issues raising livestock and raising a healthy and safe crop. There is a high probabilty we will experience another drought this year.

We reseed all of our water ways and creek banks after the 2008 floods washed them out. We spent months cleaning up debre left behind and moving down trees.

Our future goal is to hand over the farm to our sons, so they may experience the proudness feeding the world. For this reason soil production is vital.

Farmers understand their ground and resources needed to raise a healthy and safe crop better then any politican ever will. We have alot invested emotionally, physically and financially.

Thank-you

Kathy Swenka Kathleen Swenka

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1257**.

**Timestamp** 1/18/2013 3:14 PM

**Name** John Pohlman

**City** Ames

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Water is one of our State's most valuable natural resources, all care should be given to its cleanliness and value.

A) The strategy needs to have specific goals to reduce the levels of nitrogen and phosphorous on our lakes and rivers. Will one percent improvement be good enough or will fifty percent improvement be enough?

B)The strategy mandates cleanliness requirements for some but lets others do improvements voluntarily. This is inherently unfair for all lowans. If agriculture is causing part of the nutrient overload, then agriculture needs to be part of the solution. Leaders may need to provide incentives.

lowan can fix our water problems and if we don't implement a good plan to do do so, the federal government take charge of our strategy. I do not think that is a proper answer to our state's water issues.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1258**.

**Timestamp** 1/18/2013 3:14 PM

**Name** Donna Buell

**City** Spirit Lake

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Please stop insulting our intelligence. Voluntary measures to be implemented by farmers have not worked for decades. And there is no basis for believing that they will now.

A workable water quality strategy would be to require every farm to develop and implement a farm conservation plan. The plan would include a combination of practices from the science assessment of the NRS. Motivation for farmers to develop and implement their conservation plans could be through coupling them to subsidy programs or through direct regulatory requirements.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1259.

Timestamp 1/18/2013 3:16 PM

**Name** Joe Helfenberger

**City** Ottumwa

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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While we think it is very important to move in the direction of nutrient reduction, it needs to be done with affordability in mind. The amount of time given each community to achieve point source reduction must take into consideration the community's ability to pay and the amount of money currently being spent on improvement of water quality. Iowa and other states affected along the Mississippi River basin need federal financial assistance to achieve compliance with nutrient standards.

Since the largest impact on nutrient reduction in the Mississippi River basin will come from non-point sources, there needs to be immediate emphasis on this approach. However, this approach absolutely needs federal financial help to be successful. Agricultural production is one of the few remaining areas that the United States is competitive with the rest of the world. There needs to be financial incentives for the agricultural producers to improve water quality.

A long-term plan to phase in improvements in both of these programs will be more successful than stringent requirements implemented over a short period of time. It would be extremely helpful to have a group representing the municipalities and a group representing agricultural interest meet regularly with the Iowa DNR to foster a team effort for long-term, effective reduction of pollution in our waterways.

I would be happy to be a part of a team that would begin to build a working network of people dedicated to achieving pollution reduction.

Joe Helfenberger

City of Ottumwa Administrator

(641) 683-0600

helfenberger@ci.ottumwa.ia.us

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1260**.

**Timestamp** 1/18/2013 3:24 PM

**Name** Kerry Gruenhagen

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing you today to urge you to support the Iowa Nutrient Reduction Strategy as opposed to a one size fits all strategy by bureaucrats in DC. Every farm has different terrain, and different soil types that should be addressed separately to be truly effective.

Thank you for your time, and support. Kerry Gruenhagen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1261.

Timestamp 1/18/2013 3:24 PM

**Name** Stacie Johnson

**City** Cedar Rapids

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

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Policy

Point Source

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<http://www.americanrivers.org/newsroom/resources/permitting-green-infrastructure.html>

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1262.

Timestamp 1/18/2013 3:36 PM

**Name** Russel Glade

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I was very happy to see Iowa as a leader in developing a science-based strategy for reducing the amount of nutrients leaving the state in the water in our streams & rivers. In my farming operation, I have been using strategies similar to those recommended. I have not used full width tillage for over five years now, first with complete no-till, and now with strip-till ahead of the corn and no-till for the soybeans. I have also started a three-year program to put a cover crop on some of my fields in the fall. We will see how this affects our soils and the following year's crop. I put the majority of the nitrogen for my corn crop on in early summer, when the crop needs it most and will quickly take it out of the soil before it can be lost. My phosphorus and potassium fertilizers are now injected into the soil, where they are much less prone to being carried away by erosion.

I urge you as leaders and legislators to fund the Iowa Nutrient Reduction Strategy. We cannot let this initiative languish for lack of funding, causing the Federal EPA to come in at some later point and impose restrictions that will impair our ability to farm in an effective manner.

If you have any desire to use my experiences and knowledge in any way, I am always happy to share and promote the benefits of reduced tillage and proper nutrient management.

Thanks for your time. Russel Glade

**Name** Iowa League of Cities and Iowa**City** Des Moines**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

Comments Iowa League of Cities and Iowa Association of Municipal Utilities Iowa Nutrient Reduction Strategy 1/18/13

The Iowa League of Cities (League) which represents over 800 cities in Iowa of all sizes, wishes to comment on Iowa's proposed strategy for nutrient reduction aimed at helping achieve the goal set by the 2008 Gulf Hypoxia Action Plan to reduce nitrogen and phosphorus entering the Gulf of Mexico by 45 percent. These comments are also supported by the Iowa Association of Municipal Utilities.

The comments below are broken up into discussion of the point source strategy and the nonpoint source strategy. The League appreciates the work of the Iowa Department of Agriculture and Land Stewardship (IDALS) and particularly the Iowa Department of Natural Resources (DNR) in crafting this policy, and was pleased to have a stakeholder role in the outcome. The League also appreciates the additional time given by the extension of the comment period by two weeks, which was used to gather more input and to reach out to members who will be affected by the new strategy. The League has done its best during the comment period to educate its members and receive feedback on this complex and impactful proposed nutrient reduction strategy. The League hopes to continue to work with the Departments to ensure fair and affordable implementation of the State's nutrient reduction strategy.

#### Point Source Strategy

##### Cost/Affordability

A top concern of cities will be the affordability of implementation of the nutrient reduction strategy to achieve the goal of a 4 percent reduction in total nitrogen and a 16 percent reduction in total phosphorus discharged into Iowa waters by point sources. Each of the 102 major municipal facilities, targeted directly by the strategy, is uniquely situated and will be affected differently by the proposed nutrient strategy. Initial study phase of the strategy allows each municipality two years to complete a study that determines a preferred approach for meeting biological nutrient removal and another three years to negotiate construction timelines with DNR and plan necessary rate adjustments. Affordability will vary for actual on-the-ground implementation. Where one city may be able to upgrade an existing plant such as an activated sludge plant with less cost, another city with an aerated lagoon may struggle to fund infrastructure upgrades, and yet another may be unable to find funding to undertake the nutrient reduction feasibility study required to begin the point source process. It is important to note, that many cities have undertaken projects prior to this proposed strategy, which have required debt servicing and increased usage fees from users, so the ability of their citizens to absorb these costs will vary from community to community.

According to DNR estimates over the next 10 years, cities will be asked to invest at least \$1.5 billion and continue to incur operational costs of an estimated \$38 million per year (which may have omitted additional costs due to increased cost of solids handling and storage). This is no small investment for cities, and ultimately, no small impact to the 1.6 million ratepayers who will foot the bill. The strategy also points to smaller communities (not in the 102) having to evaluate nitrogen and phosphorus through the State's antidegradation process, which could also add unknown/unquantified costs to those communities. It will be important for cities to individually evaluate affordability and to potentially utilize Iowa's Disadvantaged Community Law and rules if necessary, when costs are unreasonable for their community. The League would like examples of how affordability for various cities will be determined, and clarification on whether additional costs due to solids handling and storage may be incurred, as well as what costs may affect cities outside of the 102 through the antidegradation process.

Cities understand that DNR has recognized state law prohibiting increasingly restrictive nitrogen and phosphorus limits for 10 years after completion of the construction process; however, most loans for infrastructure recognizing the useful life of the facility normally have terms of 20 years. Under the existing scenario, a city could be required to upgrade its facility again at additional cost (even if the city is still paying off a loan for previous upgrades) after just 10 years. The League urges DNR to carefully assess and address forcing any additional upgrades in any case such as this through the strategy, and look at total costs of the initial project and additional costs that may be required as a whole, instead of as individual projects-- particularly when the city has addressed the options in its initial study.

#### Benefits

The technology-based approach suggested in the strategy is preferable to alternatives, such as setting numeric water quality standards, for several reasons. First, cities will benefit from the home rule aspects of the proposed point source strategy. As mentioned above, each city is uniquely situated, and a one-size-fits-all approach would not be effective nor desirable. The flexibilities included in the strategy for cities to help determine the preferred and most affordable technology that best fits their community's needs are key to making the strategy function. The inclusion of annual versus daily limits will also enable cities to efficiently meet requirements throughout the year in a more cost-effective manner, and is an important part of the strategy. The League also understands based on the strategy proposal--and supports that specific stormwater reduction targets will not be set. Stormwater loading is extremely minor in comparison to agricultural sources and nitrogen control, in particular is difficult and very expensive to obtain in stormwater. (The League would like clarification on the interface between the strategy and stormwater permits.) Overall, the proposed technology based approach, is preferable to the imposition of stringent and unrealistic numeric criteria, that would not have a sufficient scientific basis or consideration of serious economic impacts.

**Name** Iowa League of Cities and Iowa**City** Des Moines**State** Iowa**Providing comment on the following sections:** Executive Summary Nonpoint Source Policy Point Source

#### Funding (Federal/State)

It is unclear how this point source strategy can be implemented without adequate funding from the state and federal level. If this is a federal goal, the State should aggressively seek federal funding to help implement the strategy. The only option that exists for cities for financing upgrades is the State Revolving Loan Fund. The State has not allocated any additional grants or funding sources to help lower the cost of this strategy to communities, nor are there any identified federal resources. The full cost for achieving the strategy goals, will ultimately fall on ratepayers in these cities. More specifics on obtaining additional funding or funding sources for planning and technological upgrades should be an integral part of the strategy, particularly because municipal ratepayers may be commercial or industrial partners that could be adversely impacted by significant rate increases associated with nutrient controls and choose to locate operations outside the State of Iowa.

#### DNR Response to EPA Comments

The League has concerns about the impact of EPA's recent comments (January 9, 2013 letter from Karl Brooks) on Iowa's proposed strategy, and would like clarification on several points from DNR in light of these comments. First, EPA directs the DNR to revise strategy language to clarify that schedules of compliance will not be used for meeting technology-based effluent limits. It is the League's understanding that schedules of compliance will not be used to enforce the point source strategy. Instead, construction schedules will be worked on by cities with DNR and enforceable at the state level by DNR. Second, EPA states: "Unless impracticable within the meaning of 40 CFR 122.45(d), monthly and short-term permit limits, based upon annual limits, would be required in National Pollutant Discharge Elimination System permits. This seems to fly in the face of the annual limit in the strategy. Clarification on how this will be implemented while maintaining the annual limit is needed. Finally, EPA states that clarification should be included that there may be exceptions to the 10-year moratorium where water-quality based nutrient effluent limits could be added to permits, per the regulations, if a Total Maximum Daily Load with nutrient wasteload allocations is established, or if nutrient criteria are promulgated by IDNR. The League is concerned with this statement, and would like DNR to explain how they will respond to this comment, or what changes to the strategy might be made. The League strongly supports the 10-year moratorium.

#### Non-point Source Strategy

Cities contribute an estimated 8 percent of total nitrogen and 20 percent of total phosphorous entering Iowa waterways, while non-point sources contribute 92 percent of total nitrogen and 80 percent of total phosphorous. This is a stark difference, and one that cannot be ignored. It is vital for nonpoint source contributors to participate in the reduction strategy to achieve the proposed 41 percent reduction in nitrogen and a 29 percent reduction in total phosphorous. While cities will be forced to complete studies, finance technology upgrades, maintain new technology and do it all on a construction schedule built into their NPDES permits, the non-point source strategy is a voluntary approach with few measureable standards and a less clear implementation strategy. Some additional clarity is necessary, including development of nonpoint source milestones, field monitoring of practices installed by landowners/farmers, and transparent reporting on milestone progress with strong oversight by the WRCC in close partnership with key contributors IDALS and DNR.

#### Education to Individual landowner/farmer Level

It is unclear from the strategy how education on the nutrient reduction strategy and the Nonpoint Source Science Assessment will reach 90,000 individual farmers or landowners, some of whom are out-of-state. Will IDALS do this? Will farm stakeholder groups? How will grassroots participation be encouraged and measured? How will individual farmers determine which practices can achieve the best/most cost effective results for their land? Clearly, this cannot be done by leaders of some farm stakeholder groups or crop specialists, alone. This complex strategy must not only be understood, but also embraced by individuals in order to achieve significant reductions. The strategy should outline how this educational effort will be systematically achieved, measured, and implemented.

#### Additional Goals: Increase Oversight and Transparency

The nonpoint strategy mentions a long term goal for nutrient reductions, but the League believes additional, more specific goals to increase oversight and transparency should be included. A goal for establishing baseline conditions of existing land practices must be set and attained before the use of the Nonpoint Source Science Assessment will be effective. For measurement and reporting to be transparent and understandable a baseline must first exist. An aggressive goal for accomplishing this baseline assessment and establishment should be set in the strategy.

Methods for measurement of changes to the baseline and clear criteria for reporting must also be spelled out in the strategy. It is of paramount importance that reporting and measurement of nonpoint source progress must be robust and transparent. Reports should include changes to land practices and corresponding nutrient reductions or additions. Verifiable load reductions should be included in the strategy as well as a schedule and method for reporting, so it is clear when reports can be expected. Who will report this information? To whom? Will it be posted

**Name** Iowa League of Cities and Iowa**City** Des Moines**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

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for the public to examine?

A process to connect critical watershed assessments with available funding options and programs should be included in the strategy. Only then can resources be used most efficiently. Although it will take the participation of all non-point sources in the strategy, resources for nonpoint source nutrient strategy implementation should be targeted in such a way to achieve the greatest nutrient reduction for the dollar. How will current funding options or oversight, that are typically allocated or managed on a county or regional level, be re-focused on critical watersheds? IDALS has requested funding to start the process. Water Resources Coordinating Council (WRCC) is to have a significant role in the prioritization of watersheds where the most significant load reductions can be achieved. The intersection of funding and the most bang for the buck on the nonpoint source side is not addressed in the strategy at that level, it is only discussed for specific farm practices. A connection between funding and priority setting to achieve load reductions should be included in the strategy.

#### Role of WRCC

The strategy outlines a significant and important role for the WRCC in implementation of the non-point source strategy. In order to carry out the duties outlined, including watershed prioritization, setting baselines and reporting data and progress, the WRCC will need significant technical support, strong leadership and adequate funding.

#### Other

##### Working with Other States

Iowa's strategy should not be formulated or executed in a vacuum. Iowa should work with other states that also impact the outcome of the goal to reduce Gulf hypoxia, and be at the forefront of strategies that may be implemented on a multi-state basis. This is critical because many Iowa municipalities are home to food processing, bio-tech, and other ag-based industrial ratepayers that have facilities located elsewhere in this region and other states should not gain a competitive cost advantage while Iowa pursues this strategy. In addition, although it is not addressed in the strategy, if nutrient trading on a state or interstate level is discussed, the League would like to be part of this discussion working cooperatively with nonpoint sources on cost effectively reducing nutrient loads.

In summary, the League of Cities and the Iowa Association of Municipal Utilities respectfully request clarification on the following issues:

#### A. Point Source Strategy

##### 1. Cost/Affordability

- a. How will affordability be evaluated or determined? Would DNR provide examples?
- b. Would DNR consider extending the timeline for additional facility upgrades after nutrient controls are installed?
- c. Have costs for additional solids handling and storage been considered? If not, what are those estimated costs?
- d. What are estimated/potential costs for cities outside of the 102 major municipals affected by the nutrient reduction strategy through the implementation of Iowa's antidegradation policy?
- e. Would DNR clarify that stormwater limits will not be set for nutrients, and describe more clearly how MS4 permits factor in to the strategy?
- f. Will DNR and other Nutrient Strategy partners support a system of grants or other public funding options to supplement ratepayer contributions to implement the point source strategy?
- g. Is the League's understanding that schedules of compliance will not be used to enforce the point source strategy. Instead, construction schedules will be worked on by cities with DNR and enforceable at the state level by DNR correct?
- h. Would DNR clarify how short term limits will be implemented while maintaining the annual limit?
- i. How will DNR respond to EPA's comment on the 10-year moratorium? What changes to the strategy might be made? What circumstances could result in a city not falling under the 10-year moratorium?

#### B. Nonpoint source strategy

##### 1. Additional Goals: Oversight/Transparency

- a. How will education about the nonpoint source strategy to the individual farmer/landowner level be accomplished and measured?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **4** of comment #**1263**.

**Timestamp** 1/18/2013 3:40 PM

**Name** Iowa League of Cities and Iowa

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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- b. How will WRCC ensure nonpoint source practices are documented, adopted, managed, and maintained?
  - c. Would IDALS add clarity and specificity to the reporting process in the strategy? How will reporting on nonpoint source implementation be transparent and who will be accountable for the reporting?
  - d. How soon can a baseline be determined? Would IDALS include this in the strategy?
  - e. Would IDALS include in the strategy a process to connect critical watershed assessments with available funding options and programs?
  - f. Does WRCC have sufficient resources and authority to lead and implement the strategy?
2. Regional Impacts
- a. How will Iowa (and EPA) ensure that no other states gain a competitive cost advantage as a result of pursuing this strategy?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1264**.

**Timestamp** 1/18/2013 3:41 PM

**Name** Dawn Driscoll

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please support a science-based state nutrient reduction strategy and recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. Dawn Driscoll

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1265.

Timestamp 1/18/2013 3:51 PM

Name Richard Francisco

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am more fortunate than many since my position on the Iowa Natural Resources Commission allowed me to be briefed and question the IDNR, IDALS and ISU staff who lead the teams who wrote the proposed plan. Iowa leads the nation in having the science background to write this plan. This knowledge has shown that practices that work in some of the state's soils don't in others. This is because the problems vary around the state. In southern Iowa's drift plain soils, where we farm, nitrogen is not a problem but phosphorus is, so solutions are different.

We are also still learning what works and what doesn't work. It is important that the program be voluntary and even better incentivized. In many cases producers as well as the professionals have come up with new ideas that work better than the known ideas. An example would be designing buffer strips to the contours in the drainage. Using a "fixed" width often leaves portions with no runoff buffered while areas where most of the runoff occurs is inadequately buffered. This was observed by producers trying to work with the current fixed buffer width riparian CRP program. Requiring practices at this stage of our knowledge of what works and how well will be an inadequate feel good requirement that will fail and also lose producer support which is strong in Iowa.

Adequate funding is essential to increase the practices placed on the land and the science data collection necessary to measure its success. Most producers are interested in maintaining their soil since they realize it is the largest single investment on their farm. My own farm has a riparian CRP buffer, a wetland/wildlife CRP and a Grassland CRP program that are helping to correct a previous owner's unknowing mismanagement. Which is another reason the plan must have adequate funding in the Education section. Most producers need to know what practices they need to use to protect their soil. Which will also protect the downstream users and the Gulf.

Thank you for taking the time to read my opinion and supporting the voluntary science based plan created by the professionals and producers closest and most knowledgeable about the problem. Richard Francisco

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1266.

Timestamp 1/18/2013 3:51 PM

**Name** Darrell Haack

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please adequately fund the Iowa Nutrient Reduction Strategy and other cost share conservation practices. It is important to look at this as a scientific study for the importance of agriculture. Some of the things I have implemented for my farm has been soil sampling to reduce the amount of fertilizer where it doesn't need it, and have also went 100% no-till to prevent soil erosion. I am also considering seeding cover crops in the future as well. This is all to benefit my farm and the environment as well. Darrell Haack

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1267.

Timestamp 1/18/2013 3:52 PM

**Name** Keith Braun

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I totally support the I.D.A.L.S. Strategy of voluntary conservation practices and the need to maintain agriculture production. Keith Braun

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1268**.

**Timestamp** 1/18/2013 3:53 PM

**Name** Tricia McKenney

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I believe Iowa should support, as I do, a science-based state nutrient reduction strategy. Relying on facts is always better than relying on emotion.

Voluntary conservation practices are flexible enough to get the best results on a farm to farm basis and consider individual topography needs.

When fully funded, voluntary conservation practices have been proven to be widely accepted and adopted by farmers. On our own farm we have terraces and field borders. We practice no-till planting, soil-sampling on grids, injecting nutrients to reduce run-off, and use structures to contain animal waste to keep it from contaminating soil and water. We have used state cost share and EQUIP funds to help implement these practices. Tricia McKenney

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1269.

Timestamp 1/18/2013 3:57 PM

**Name** Donald Armstrong

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please adequately fund the Iowa Nutrient Reduction Strategy, as well as the State's other conservation cost-share programs. Donald Armstrong

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1270**.

**Timestamp** 1/18/2013 3:58 PM

**Name** James Boyer

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing to you today to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Though we do already use conservation practices on our operation, such as injecting our hog manure on our fields, and conservation tillage. I believe that we have a responsibility to lessen the impact that production agriculture has on our environment. I am looking forward to working with IDNR & IDALS to achieve this plan. James Boyer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1271**.

**Timestamp** 1/18/2013 4:00 PM

**Name** Clarence Miller

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing in support of the Iowa Nutrient Reduction Strategy and feel that this program should be funded. We work with several groups to continue volunteer conservation practices and will continue to do so without the EPA and other "big guys" making mandates.

Farmers take care of their land, the water and the air. It is in our best interest to do so also. Clarence Miller

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1272.

Timestamp 1/18/2013 4:02 PM

Name Ben Koellner

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I am asking for your support of the Iowa Nutrient Reduction Strategy.

The strategy is a science and technology based approach developed by the Iowa Department of Agriculture and Land Stewardship (IDALS), the Iowa Department of Natural Resources (DNR), and Iowa State University (ISU) to encourage the adoption of voluntary conservation practices that will have the greatest benefit for water quality in the state. It uses ISU research to determine which practices are most effective when applied to Iowa's unique landscapes. The strategy outlines these efforts in a scientific, reasonable and cost-effective manner, an approach supported by Farm Bureau members.

Some groups and individuals are already saying the Iowa Nutrient Reduction Strategy won't work. They believe voluntary conservation practices on farms do very little to protect water. They're calling for more regulation of farms, similar to the costly one-size-fits-all regulations imposed on farmers in the Chesapeake Bay area.

Farmers such as myself know better! We want to continue to be part of the solution, but we know that new regulations aren't the answer.  
Ben Koellner

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1273.

Timestamp 1/18/2013 4:05 PM

**Name** James R. Rasmussen on Behalf of

**City** Ankeny

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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January 17, 2013

Nutrient Reduction Strategy

ANR Program Services

2101 Agronomy Hall

Ames, Iowa 50011-1010

Director Chuck Gipp

Iowa Department of Natural Resources

Secretary Bill Northey

Iowa Department of Agriculture and Land Stewardship

Wallace State Office Building

502 East 9th Street

Des Moines, IA 50319-0034

RE: Iowa Nutrient Reduction Strategy

Dear Director Gipp and Secretary Northey:

The Iowa Water Environment Association (IAWEA) is an organization of professionals committed to the education and advancement of water quality and water pollution control techniques. The 600 plus members consist of educators, operators, engineers, regulators, municipal officials, manufacturers and equipment suppliers, contractors, and students. The Iowa Water Environment Association is an affiliate of the Water Environment Federation (WEF), an international not-for-profit organization dedicated to the preservation and enhancement of water quality throughout the world.

IAWEA supports the Iowa Nutrient Reduction Strategy concepts. Although the point source strategy will result in significant increases in costs of wastewater treatment for our major treatment facilities with relatively minor impacts on the total annual Iowa nitrogen loads, IAWEA recognizes the importance of working with nonpoint sources in reducing the total nutrient loads from all sources.

Some wastewater treatment facilities in Iowa have already installed nutrient reduction processes. Other are planning and constructing plant modifications for nutrient removal. Some have designed plants that include the ability to modify their plants for installation of nutrient removal processes.

Our members are concerned that the nonpoint source strategy is implemented and significant reductions in nutrient loads from nonpoint sources are achieved. As the strategy clearly illustrates, the point source contribution to Iowa's annual nitrogen and phosphorus load to the Gulf of Mexico is relatively insignificant as compared to the nonpoint source load. We are concerned that after expenditure of about \$1.0 billion dollars in wastewater treatment facility improvements, there will not be a significant reduction in total nutrient loads unless the nonpoint source loads are reduced.

We encourage the Iowa Department of Agriculture and Land Stewardship (IDALS) to aggressively lead the Water Resources Coordinating

**Name** James R. Rasmussen on Behalf of**City** Ankeny**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

Council (WRCC) in developing policies and incentives for implementing the nonpoint source practices for reducing nutrient loads. The Iowa Science Assessment of Nonpoint Sources is an excellent tool and reference for developing policies for targeting any public funds toward the most cost effective projects. We commend IDALS for basing the implementation strategy on economically efficient policies and directing public funds and incentives to areas and projects that provide the greatest reductions in nutrient loads at the least cost.

We request that the strategy include a requirement for the WRCC to develop a schedule with specific nutrient reduction goals within one year and update the schedule annually.

We encourage IDNR to investigate the feasibility for a nutrient credit trading program whereby one nutrient discharge source can purchase credits from another source that implements nutrient reduction practices in lieu of constructing expensive treatment plant modifications for achieving extremely stringent nutrient discharge limits.

It is critical that a good scientific based nutrient load monitoring program be developed by IDNR in 2013 and that adequate resources are allocated to in-stream water quality monitoring and documentation of agricultural land management practices. It is essential that we start with good baseline nutrient load data and that we accurately monitor our progress with nutrient load reduction as we implement the strategy.

We encourage IDALS and IDNR management to work with the WRCC in evaluating the question of whom ultimately should bear the costs of nutrient reduction strategy implementation. We realize that implementation of several of the nonpoint source strategy practices will increase the operating costs for farmers. This may ultimately result in higher food prices. Some of the practices such as wetlands will result in benefits to sportsmen due to increase in wildlife habitat. Therefore, it seems appropriate that State and Federal public funds be allocated for financing a portion of the nonpoint source implementation. For example, perhaps the Farm Bill could include provisions for funding nutrient reduction activities. Likewise, it is appropriate to allocate public funds for financing a portion of the point source costs.

We encourage the WRCC to routinely, at least annually, review and update the nutrient reduction strategy. This is a dynamic process and the document must be updated to reflect policy developments and new technical information.

Because the Nutrient Strategy compels WRCC and State of Iowa development of new nutrient control options and land management practices in partnership with all sources involved in this effort, it is imperative that legal mandates are clear that will allow the State and its agencies authority to make financial commitments for distribution of public funds that may be very different than current procedures. Drainage districts, school districts, sewer districts and 28E agreement organizations are a few examples of authorities that have legal authority to tax, sell bonds, develop budgets and have boards where the membership is scripted.

We encourage IDNR and IDALS to work cooperatively on the nutrient issue. Both agencies have talented staff. We encourage you, as leaders of your departments, to promote a cooperative working relationship between your staff in an effort to achieve the nutrient reduction strategy goal of 45% reduction in Iowa's nutrient load to the Gulf of Mexico.

In summary, we request the following revisions to the draft Nutrient Reduction Strategy and implementation details:

1.IDALS should aggressively direct the WRCC to develop policies and incentives for implementing practices that reduce nonpoint source loads.

2.IDNR should investigate a nutrient credit trading program.

3.IDNR must review the methods used for estimating the base nutrient loads and develop a good scientific based in-stream water quality monitoring program in 2013. Adequate resources must be allocated to the monitoring program.

4.Add a requirement for WRCC to develop a schedule with specific nutrient mass reduction goals within one year and update the schedule annually.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **3** of comment #**1273**.

**Timestamp** 1/18/2013 4:05 PM

**Name** James R. Rasmussen on Behalf of

**City** Ankeny

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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5.WRCC should evaluate the question of who should ultimately bear the costs of nonpoint source and point source nutrient load reduction and develop a plan for requesting public funds and financial incentives for implementation of nutrient reduction practices.

6.WRCC should review and update the Nutrient Reduction Strategy annually.

7.IDNR and IDALS staff should work cooperatively on the nutrient issues.

We look forward to assisting IDNR and IDALS in the implementation of the nutrient reduction strategy. IAWEA members have assisted IDNR on past projects with state wide special stream and effluent monitoring programs. We realize the importance of good data in the decision making process and we will assist IDNR staff in this effort if possible.

Sincerely,

IOWA WATER ENVIRONMENT ASSOCIATION

James R. Rasmussen, P.E.

President

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1274**.

**Timestamp** 1/18/2013 4:11 PM

**Name** Lyle Krueger

**City** Cedar Falls

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Our primary concerns are:

1. That a strategy is developed that EPA will approve that will allow DNR to retain primacy over the NPDES program. Is losing primacy a risk?
2. That there be reasonable timetables for incorporating changes. Preserve/observe a 10 year moratorium policy.
3. Related to number 2 above, funding is a big issue for the smaller major municipal point sources. It's commendable that the strategy is intended to achieve the most "bang for the buck." Cedar Falls is completing a major construction project (\$19 million) and adding a BNR system to a fixed film trickling filter plant would cost the city an additional \$18 million at a minimum, by current engineering estimates and essentially double our debt load. Can there be a top down approach to removing the necessary nutrient loadings? Can the desired total mass reductions be accomplished by focusing on the biggest five or 10 POTWs as opposed to trying to squeeze drastically smaller amounts of nutrients from all 102 of the major municipals?

Thank you for considering this input. I don't envy your job of having to work through all of this.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1275**.

**Timestamp** 1/18/2013 4:12 PM

**Name** David Carter

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Agriculture in our state occupies a premier place in the economy and in the ecology. Depending on volunteers to provide conservation of water resources at their own expense is like depending on volunteers to provide our tax revenues. The state government should first provide funding for enforcement, research and assistance. Secondly, provide education on the true and long term consequence of conservation versus short term exploitation of our fundamental resource, water. The draft plan is an insult to educated citizens and a clear concession to short term economic gain by corporate agriculture interests.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1276.

Timestamp 1/18/2013 4:22 PM

**Name** Roger Wolf

**City** Ankeny

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Comments on Iowa Nutrient Reduction Strategy

By the Iowa Soybean Association

To: Terry E. Branstad, Iowa Governor  
Bill Northey, Iowa Department of Agriculture and Land Stewardship  
Charles Gipp, Director, Iowa Department of Natural Resources

Dear Governor Branstad, Secretary Northey, and Director Gipp,

The Iowa Soybean Association (ISA) appreciates this opportunity to comment on the "Iowa Nutrient Reduction Strategy (INRS)" issued in November 2012.

The ISA expands opportunities and delivers results for Iowa soybean farmers and their customers. We create and implement strategic and innovative programs in the areas of renewable fuels, environmental stewardship, production and research, international marketing, agricultural awareness, transportation and soy foods. As one of the primary stakeholders that is affected and also is responsible for engaging in its implementation, we take the INRS very seriously.

The ISA is enthusiastic about the future for Iowa and beyond our borders to do this business right. We have been a leader and an advocate for redefining farmer leadership on nutrient and water quality issues for decades and stand ready to assist in the future.

We support development and implementation of a robust and unified INRS as a priority for ensuring a future that has Strong Soils and Safe Water. We are pleased to see the inclusion of both point source and nonpoint source communities in a comprehensive strategy along with the science assessment accounting for the costs and performance of various practices. Our view is that the Water Resources Coordinating Council makes logical sense to be the governing entity to oversee the multi-faceted operational planning and implementation of the INRS. We believe the INRS has the correct approach. Iowans have never had access to a strategy such as this.

ISA supports locally-based watershed management strategies to solve water management challenges. As an industry, we expect to increase efficiency and effectiveness of our management, while also deploying strategies and practices that will avoid, trap, treat and capture nutrients that would otherwise be lost from the landscape system.

While the INRS science assessment is a good first step, there are significant limitations that are understandable and apparent given the current state of land use and management data researchers have access to. Coupled with this is the fact that cost-effective measures perform differently across different watersheds. For the strategy to work, stakeholders in priority watersheds/landforms must gain a good knowledge of their watersheds before adopting any control policies. Targeting different pollutants will mean different land use options. As the strategy is communicated to the public this will be important for stakeholders to understand. Many stakeholders don't understand the complexity of the landscape and the fact that not all practices will yield improvements as others is an important distinction and challenge. The INRS has the foundation to support dissemination of this information. Future strategies will need to build the research and science base to support accountability measures and management capacity. We must get better at prioritizing strategies at multiple scales, locally and at the state level.

#### Recommendations

- Focus first on communications and education as stakeholders across Iowa need to understand the strategy and engage on developing operational plans.
- Continue implementation and alignment of programs and projects, leveraging the investments of public and private support.
- Continue use of the Water Resources Coordinating Council and Watershed Planning Advisory Council as a way to develop, coordinate and review implementation strategies.
- Find ways to improve collection and analysis of land use and management data, improving both accountability for measuring progress and also management optimization.
- Avoid best practice mandates on farmers. Nutrient mitigation practices and programs should be voluntary and market-driven and customized to suit the conditions and opportunities the watershed/landscape provides.
- We urge legislature funding to support coordination and implementation of the INRS.

Thank you for your time and consideration.

Sincerely,

Roger R Wolf, Director of Environmental Programs and Services, Iowa Soybean Association, Tel: 515-334-1051, email [rwolf@iasoybeans.com](mailto:rwolf@iasoybeans.com)

**Name** Jennifer McIvor**City** Urbandale**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

January 18, 2013

Mr. Chuck Gipp, Director  
Iowa Department of Natural Resources  
Wallace State Office Building  
502 East 9th Street  
Des Moines, Iowa 50319

Mr. Bill Northey, Secretary  
Iowa Department of Agriculture and Land Stewardship  
Wallace State Office Building  
502 East 9th Street  
Des Moines, Iowa 50319

Submitted via website.

Re: Comments of MidAmerican Energy Company on the Iowa Nutrient Reduction Strategy

Dear Mr. Gipp and Mr. Northey:

Headquartered in Des Moines, Iowa, MidAmerican Energy Company ("MidAmerican") provides natural gas and electric service to 729,844 customers in a 10,600-square mile area in Iowa, Illinois, South Dakota and Nebraska. As part of the company's diverse electric generation portfolio, MidAmerican operates six electric generating stations with National Pollutant Discharge Elimination System ("NPDES") wastewater permits in Iowa. MidAmerican believes responsible environmental management is good business. It benefits our customers and improves the quality of the environment in which we live. MidAmerican supports the goal of reducing nutrient loading to Iowa's lakes and streams and applauds the efforts of your agencies to develop a comprehensive strategy that addresses both point and nonpoint discharges of nutrients. MidAmerican appreciates the opportunity to submit comments on the Iowa Nutrient Reduction Strategy ("NRS"). This strategy has the potential to affect operations at a number of MidAmerican's permitted facilities and we respectfully submit the following comments:

#### Section 1 Policy Considerations and Strategy

The NRS refers to a U.S. Environmental Protection Agency ("EPA") document entitled "Working in Partnership with States to Address Phosphorus and Nitrogen Pollution through Use of a framework for State Nutrient Reductions" used in development of the strategy. While this document includes eight elements of a state framework, it appears many of the elements were only partially incorporated into Iowa's strategy. MidAmerican encourages your agencies to accept the EPA's offer of assistance to develop a more robust nutrient reduction strategy and to afford additional periods for public review and comment as this strategy takes shape.

Many of the elements within the EPA strategy framework depend on prioritizing watersheds, including the following:

- Setting load reduction goals – Measurable, numeric reduction goals should be tailored to each watershed, focusing on those with the heaviest loading.
- Ensuring effectiveness of point source permits – Reduction should be based both on the prioritization of watersheds and should then target the heaviest loads.
- Agricultural areas – Without prioritizing watersheds/sub-watersheds, it is difficult to determine the best locations for pilot projects, demonstration projects, or getting the best return on investment.

Rather than prioritizing watersheds as part of the strategy development, the Iowa strategy currently defers the prioritization process to some point in the future without identifying a timeline or process to complete this prioritization. MidAmerican believes that a more efficient nutrient reduction strategy can be implemented by first prioritizing watersheds with the highest nutrient loads and then working with point and nonpoint discharges within those watersheds to achieve nutrient reductions. An appropriate starting point would be Iowa's 2004 nutrient budget, which was developed by your two departments.

Finally, the document refers to the strategy as an outline of voluntary efforts to reduce nutrients. MidAmerican believes the characterization of the strategy as wholly voluntary is inappropriate, especially as applied to point sources. The draft strategy contemplates incorporating total nitrogen ("TN") and total phosphorus ("TP") effluent limits into NPDES permits for point sources. Once limits are incorporated into NPDES permits, the voluntary nature of the strategy ends and the nutrient reduction strategy becomes enforceable in point-source discharge wastewater permits.

MidAmerican encourages IDNR and IDALS to take advantage of the stakeholder group framework in developing of the final version of the NRS. MidAmerican believes that the use of this open and transparent framework will allow for greater buy-in and possibility of success for the final strategy.

#### Section 2: Non-Point Sources

MidAmerican believes that a successful approach to reducing nutrient loading in Iowa waters will take a reasonable, realistic, and balanced approach. MidAmerican also understands that IDNR and IDALS do not legislate, but must work within legislative direction.

In a recently released Iowa State University report entitled "Historic Water Quality Conditions in Iowa Natural Lakes," the analysis concluded

**Name** Jennifer McIvor**City** Urbandale**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input checked="" type="checkbox"/> Point Source

that the rate of sediment accumulation in Iowa lakes is accelerating. (Heathcote, A. J., Filstrup, C. T., & Downing, J. A. (2012). Historic Water Quality Conditions in Iowa Natural Lakes. Iowa State University, Department of Ecology, Evolution, and Organismal Biology, Ames, Iowa.) The report found that the time period this accumulation began accelerating coincides with the start of industrial agriculture in the 1940s-1950s. It is clear that existing conservation voluntary programs to treat agricultural runoff are not reducing nutrient runoff. Rather than relying on the status quo and extending current policies, MidAmerican encourages IDNR and IDALS to work to develop new ways to approach the problem.

The participation rates required in the combination scenarios within the report are unrealistic at best (e.g. "60% Acreage with Cover Crop"). Many of these scenarios require participation rates of 50% or greater on agricultural land statewide. With 2011 estimated total acreage in production at 30.7 million acres. Under one scenario of the NRS, 60% of this acreage means that at least 18.42 million acres need to use best management practices as identified in the strategy. U.S. Department of Agriculture data indicates that current acreage enrolled in all conservation practices in Iowa is approximately 1.6 million acres, or 5.2%. It is clear that current practices are not achieving a demonstrable impact and it is unclear from the strategy how continuing current practices will achieve greater participation rates. As currently drafted, the strategy places the burden on point-source discharges to achieve discrete nutrient reductions but continues with voluntary measures for nonpoint sources when these measures have not been shown to achieve significantly measurable reductions.

The lack of specific, clear, and measurable goals or recommendations for non-point sources is also a significant omission. To achieve the nutrient reduction goals identified in the strategy, the strategy needs to identify an implementation plan as well as a metric to gauge progress towards these goals. Without these measures, it is difficult to understand how the nonpoint science assessment can be regarded as a strategy at all.

### Section 3: Point Source Discharges

The draft strategy is unclear about the timing necessary to modify NPDES permits to incorporate the nutrient reduction targets. MidAmerican requests that any new monitoring or feasibility requirements be included in a NPDES permit only at the end of each five year permit cycle. A permit renewal should be the only factor used to incorporate nutrient requirements into wastewater permits; the nutrient strategy alone should not be used to open a permit for modification outside the normal five-year renewal schedule. For those facilities which need to complete a feasibility study, the strategy should clarify the schedule and scope of such studies, including whether a third-party consultant is required to conduct the study.

It is also unclear how the Iowa Department of Natural Resources intends to implement the NRS for point source dischargers without biological treatment, and whether there are mechanisms by which a facility can demonstrate it should not be subject to the NRS. MidAmerican requests that facilities without biological treatment should only be required to monitor for the presence and concentration of nutrients in wastewater streams. If concentrations above the NRS effluent target are not found, the facilities should be allowed to discontinue monitoring and a feasibility study should not be required. Additionally, MidAmerican believes that surface water withdrawn for processes such as once-through cooling water, where no contact is made with other process flows, should be exempted from monitoring and the proposed limits. MidAmerican also asks that other discharges at a facility, which are sourced from surface water, be subject to the limit on a net-addition basis to account for existing concentrations in surface water.

Finally, MidAmerican has received a copy of an expanded industrial facilities list that includes five MidAmerican facilities as "major" dischargers. An error was noted in this draft list: Louisa Generating Station (NPDES Permit #: 5800105) was listed as an industrial facility with an activated sludge treatment system. Louisa no longer utilizes an activated sludge wastewater treatment system for domestic sewage treatment. The facility now has a mound septic system with no discharge, and the previous outfall has been eliminated as reflected in the permit issued April 12, 2012. This change should be reflected in the list of major dischargers used for the NRS.

MidAmerican appreciates the opportunity to comment on the draft Iowa Nutrient Reduction Strategy.

Respectfully submitted,

Jennifer McIvor  
Director, Environmental Programs, Compliance and Permitting  
MidAmerican Energy Company  
4299 NW Urbandale Drive  
Urbandale, Iowa 50322  
(712) 352-5434  
e-mail: jmcivor@midamerican.com

**Name** Trees Forever**City** Marion**State** Iowa**Providing comment on the following sections:**

<input type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

Trees Forever would like to thank the Nutrient Reduction Strategy Team for undertaking such a monumental task in developing the Iowa Nutrient Reduction Strategy and for positioning Iowa as a national leader in improving water quality and reducing nutrient pollution.

As the science assessment conducted for the strategy shows, buffers provide significant reductions in both phosphorous (58%) and nitrogen (91%), and while it should be noted that N reductions specifically are limited to the volume of water in actual contact with the root zone of the buffer, relatively recent and on-going research into the design of saturated buffers is showing considerable progress in delivering even higher volumes of tile water for treatment. This will make buffers an even more attractive option for reducing both N and P. Of course buffers provide many other benefits as well, from increased carbon sequestration to mitigate global warming, to enhanced wildlife habitat, the benefits are many.

What makes buffers work so well is perennials. Grasses, flowers, trees and shrubs provide the living cover and root systems to hold soil in place throughout the year, even in the early spring when precipitation rises and downpours can occur. The perennial influence can be seen in other practices that show significant reductions in N and P. Cover crops & living mulches (31% - 41% less N), energy crops (72% less N and 34% less P), CRP (85% less N and 75% less P), grazing (85% less N and 59% less P), all these perennial options can provide the reductions needed to achieve water quality goals. While it will take more than just getting more perennials on the ground, virtually nothing else provides the most benefits for dollar expended than focusing on perennial options and buffers specifically.

Given how well perennials work to achieve the reductions called for, we strongly encourage the Water Resources Coordinating Council to prioritize practices that use perennials for further research funding and implementation. Certainly, challenges exist to wider adoption of perennial options on the landscape, but with coordinated funding we can overcome some obstacles to getting perennials on the landscape.

Trees Forever is entering its 15th year of working with the agriculture community establishing buffers to achieve multiple benefits. Surveys conducted in 2008 asked landowners to self-report on how well their buffers were functioning and improving water quality. 96% of respondents replied that their buffer was effective in controlling erosion and protecting water quality and 95% replied that their buffer was working as hoped. This feedback shows us that not only do buffers work (as the science has shown), but that landowners recognize how well buffers work on their farm and the value they provide in improving water quality.

We look forward to working with stakeholders, landowners, agency staff, and other partners in implementing the Nutrient Reduction Strategy in Iowa and achieving the water quality goals established. To achieve the nutrient reductions specified within a voluntary framework, additional funding must be a priority to support the implementation of this plan and the practices outlined. Technical assistance on planning, design, establishment, and maintenance will also need to be increased congruent with the demand. Trees Forever, along with a host of other organizations working with landowners on landscape decisions, stand ready and welcome the opportunity to get started. Iowa's farmers are innovative, caring, and willing to roll up their sleeves to get the job done; we look forward to assisting them in this voluntary endeavor.

**Name** Jeff Jensen**City** Lone Rock**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

My comments, praise, criticism, and suggestions are all within the context of truly wanting to see improved water quality for improved health and quality of life. To achieve this, perennials need to be at the top of the prioritization list given the multiple benefits they can provide and the documented effectiveness at reducing nutrient loading. Furthermore, perennial crops strategically placed on the landscape fit within a market based approach favored by the nutrient reduction plan.

First the praise,

- Thanks to members of the science assessment team working to document and organize the various practices and modeling use in the state.
- The strategy recognizes that more information and further research is needed.
- Recognition that targeting will be required to make significant reductions.
- Flexibility for pilot projects to demonstrate new technologies.
- Seeks to establish Iowa as a national leader in addressing nutrient loading and improving water quality.

Now the criticism,

- The whole secretive process leading up to the release of the strategy was disappointing. As a citizen I value transparency throughout government. It did not seem warranted and should not have been handled in such a way.
- Although addressed in the strategy itself as an area that needs more research, the economic analysis not providing any sort of benefit for the simple value of clean water was disappointing, as was the fact that some of the scenarios that called for perennials (buffers, land retirement, energy crops) received no credit for ancillary benefits. The reason for this concern is that it may skew the viability of these practices in being established.

General Comments,

- While it is understandable why you included corn yield reductions for practices in the analysis, in some cases it is probably not appropriate. The strategy states that the current corn/soybean rotation is "leaky" directly attributing to the problem.
- While nutrient trading has the potential to improve water quality at a lower cost compared to point source measures, the development of such a program will be challenging; property rights will be involved, contracts will need to be uniquely structured, proper baselines established, monitoring for performance developed, verification of reductions conducted, and other issues not foreseen. This does not mean that such a program should not be considered it's merely meant to point out the very real challenges of such a system. Alternatively, Iowa already has a mechanism in place that looks similar to what a potential water quality trading program might achieve. The recent changes allowing for the State Revolving Fund to fund non-point source projects are an excellent first step to getting practices installed for long-term service.

Suggestions,

- Practices that establish perennials on the landscape will give us the most bang for the buck, thus research and demonstration projects that facilitate greater perennial use should receive the highest prioritization. This includes such things as deriving monetary values for diverse ecosystem services and allowing for such services to be stacked for maximum return to the landowner.
- Additional research and demonstration should be prioritized for saturated buffers to increase water volume of tile water contacting the root zone for treatment.
- Marketing assistance and value added funding for perennial crops should receive priority status since small investments in fledgling industries could have significant payoffs down the road (hazelnuts, aronia berry, etc).

In closing, and as a taxpayer who will inevitably be asked to support some of these practices, I want to see my dollars spent on practices and solutions that provide the most benefits for dollars expended. Perennials provide an excellent return on investment when all the benefits are tallied up. Further targeting perennials to the most environmentally sensitive acres will provide even more bang for the buck.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1280**.

**Timestamp** 1/18/2013 4:47 PM

**Name** Richard Miller

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I'm asking you to support the funding of the Iowa Nutrient Reduction Strategy as well as other conservation cost-share programs . I think that as in the past the farmers of Iowa will step up to the challenge to keep our land and waters safe for this generation and those of the future and it can be done voluntarily NOT by mandates Richard Miller

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1281.

Timestamp 1/18/2013 4:48 PM

Name Steve Veysey

City Ames

State Iowa

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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I have served previously on the DNR Water Quality Standards TAC (1999-2003), and the Governors Water Quality Task Force (2002-2003). I have not been actively involved in WQS issues for several years. My comments will be brief.

The proposed Nutrient Reduction Strategy is strong on science and technology and (as usual) weak on effective policy and implementation. Meaningful water quality improvements will not be achieved because the plan:

(1) Relies on voluntary implementation of best management practices (BMPs). This is a continuation of the oxymoronic  voluntary compliance approach that continues to be advocated by all sectors of agribusiness. This continues to be a smokescreen behind which agribusinesses can continue to use practices that degrade water quality in virtually every watershed in Iowa.

(2) Requires  market-driven solutions for agricultural non-point source pollution. This will result in BMPs not being implemented unless there is economic benefit to the agribusiness. Market driven solutions are also part of the recent implementation of Tier 2 antidegradation reviews for  point sources but with a very distinct difference. The degree to which facilities are required to incur costs to approach Tier 2 protection (no reduction in higher levels of water quality) does in fact use a cost-benefit metric, but within the cost determination the preservation of  water quality is seen as a benefit to the public.

The current political landscape dictates that the nutrient reduction strategy be based overwhelmingly on voluntary implementation of BMPs. This will not work. The political landscape must be cultivated to require mandatory reporting of BMP implementation, even if the implementation itself remains voluntary. Under the Clean Water Act, this approach could be required NOW, in all watersheds with 303D-listed waters, if we had the gumption to buck agribusiness interests. At the very heart of the TMDL concept is notification to polluters in a watershed and (for point sources) a specific allocation of pollution load. It is mandatory for point sources to discharge no more than their allocation, and to monitor and report progress. We certainly have the GIS and internet savvy to create a mandatory reporting portal for all businesses and residents in a 303D impaired watershed. Even if non-point source polluters are not required to implement BMPs to reduce the level of their pollution, they must at least be required to report their non-compliance.

The only reason we do not have mandatory reporting is because it would show once and for all that the  voluntary compliance approach is very heavy on the  voluntary, and very light on the  compliance.

I could expound at much greater length about the flaws in this Strategy, however I would be just another voice to be ignored advocating implementation policies not always  voluntary or  market-driven.

Why should I even bother?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1282.

Timestamp 1/18/2013 4:49 PM

**Name** Kaye DeLange

**City** eddyville

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

January 18, 2013

Secretary Bill Northey

Iowa Department of Agriculture and Land Stewardship

Director Chuck Gipp

Iowa Department of Natural Resources

Wallace State Office Building

502 East 9th Street

Des Moines, Iowa 50319-0034

RE: Iowa Nutrient Reduction Strategy

Dear Secretary Northey and Director Gipp:

Cargill, Incorporated is an international producer and marketer of food, agricultural, financial and industrial products and services. Cargill businesses work with commodity growers and livestock producers throughout Iowa. The company employs 4,000 people in over 25 Iowa communities and has invested over \$150 million in its Iowa operations in just the last two years.

Cargill supports the framework developed in the Iowa Nutrient Reduction Strategy as developed by the Iowa Department of Natural Resources and the Iowa Department of Agriculture and Land Stewardship. As developed, the point and nonpoint source policies are practical, cost effective approaches to reducing the nutrient levels in Iowa waterways.

Two Cargill facilities in Iowa use biological treatment to process waste. We continually work to make our nutrient removal systems more efficient. Evaluating technology-based discharge limits for existing facilities like ours is more practical than numeric in-stream water quality standards.

Given Cargill's breadth of relationships with Iowa commodity and livestock producers, the company is supportive of the nonpoint source strategy. The assessment of nonpoint source management practices will enable the development of an efficient means to direct public funds and incentives to effectively provide for the greatest reduction in nutrient loads. Iowa producers will remain competitive in grain and livestock markets with efficient and effective practices to minimize nutrient loading in Iowa waterways.

Respectfully submitted,

Kaye DeLange

Facility Manager

Cargill Corn Milling North America

Eddyville, Iowa

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #1282.

Timestamp 1/18/2013 4:49 PM

**Name** Kaye DeLange

**City** eddyville

**State** Iowa

**Providing comment on the following sections:**

Executive Summary     Nonpoint Source  
 Policy                       Point Source

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**Name** Cindy Hildebrand**City** Ames**State** Iowa**Providing comment on the following sections:**

<input type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

When I started reading this strategy, I found it hard to believe that it was proposing to continue the all-voluntary approach to agricultural pollution that has failed to protect Iowa water for so many years. But when I attended the informational meeting about the strategy in Ames, I learned that was indeed the case. Meeting attendees were assured by members of the presiding panel that if Iowa farmers were asked, they would do far more water protection than they have ever done before, and would do it at their own expense, since little public funding is available.

Below are ten of the reasons why that assurance is so deeply unrealistic.

- 1) High crop prices and high land prices, which are a strong incentive to rowcrop as intensively as possible.
- 2) Very high rents and a high percentage of Iowa cropland being rented, which means that a lot of Iowa land is being farmed by operators who do not own the land they farm and have a strong economic incentive to rowcrop every possible acre for the highest possible return.
- 3) The likelihood that the next Farm Bill will not only have less funding for conservation programs, but will also terminate current conservation compliance requirements.
- 4) Widespread ongoing installation of new conventional tile, largely because the payback period for new tile has shrunk to just a few years. Adding more tile increases yields, but it can also increase water pollution.
- 5) A new strong incentive to rowcrop marginal land, an incentive that is being caused by the combination of new higher official CSR ratings for lighter soils and county tax policies that are based on CSR ratings. The result is that in many hilly counties, landowners are being told that they will have to pay higher rowcrop-level taxes on a lot of sloping land that is currently in pasture and woodland. Many of those landowners are now converting or will convert that hilly land to rowcrops, with very bad consequences for soil, water, and wildlife.
- 6) New cellulosic ethanol plants that pay farmers for their corn cobs and stover. Even if the stover removal doesn't cause more water pollution, and it may do so in the future, the ethanol plants are an added incentive to grow more corn, which is hard on soil and water. In addition, there was a report at one ethanol-plant meeting that the cellulosic ethanol plants will enable continuous-corn operations to be significantly more profitable, which means there is another incentive for producers to move to continuous corn.
- 7) Widespread expansion of rowcropped acres through the conversion of CRP land and other land in perennial vegetation.
- 8) The tendency, which can be seen by anyone who drives rural roads, to expand the boundaries of existing rowcropped fields closer to road ditches, into the edges of waterways, etc. I see it in my area and friends in other rural parts of Iowa are seeing it too.
- 9) The fact that farming, as Iowans are often reminded, is a huge industry. Farmers are like other business people who have varied levels of concern about the environment. While some farmers have conservation as a primary focus, the majority of farmers are largely focused, like other business people, on the bottom line.

I grew up in the Detroit area before the Clean Water Act was passed, when local rivers were horribly polluted. If the Clean Water Act had told manufacturers that installing pollution control equipment was optional, some manufacturers would certainly have installed it, but the majority would not, and rivers would still be catching on fire. That is the basic economic reality of pollution control, which the Clean Water Act recognizes but this strategy does not.

- 10) The failure of the voluntary-only approach to farm conservation to work during the many years it has been used, which is why Iowa's water is so bad now. And according to a 2011 ISU survey, as recently reported in the DES MOINES REGISTER, 72% of Iowa farmers spent less than \$5,000 on conservation on land they own in the decade prior to the survey. Half spent nothing. One third said that even if more money and technical assistance were available, they would not implement more conservation practices.

## Iowa Nutrient Reduction Strategy

Online comment submissions

Page **2** of comment #**1283**.

**Timestamp** 1/18/2013 4:58 PM

**Name** Cindy Hildebrand

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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At the Ames informational meeting, attendees were told that as part of the effort to persuade Iowa farmers to do more water protection, market-based strategies would be used. When the panel was asked for an example of a market-based strategy, the only example provided was actually based on wetland regulation.

In addition, it was reported in the news that when a group of Iowa farmers were told about the strategy at one meeting, there were repeated references by the speaker to the big danger of the EPA stepping in and requiring regulations on agriculture if the strategy did not work. The threat of regulation seemed to be invoked far more than any other reason to control water pollution. The reason most water pollution plans and laws across the country in the past several decades have involved regulations and/or economic incentives is because regulations and economic incentives have been shown to work. This strategy has neither.

Of the significant deficiencies in this strategy, perhaps the most disturbing is that there are no timetables, deadlines, or short-term and long-term water-quality goals for Iowa lakes and rivers. If this strategy were put into action, it is easy to foresee someone pointing, fifteen years from now, to a quarter-percent decrease in nitrate pollution in some tiny Iowa watershed and calling it clear evidence that the strategy is successful. In fact, it is hard not to suspect that the strategy might have been written with that in mind.

I have been a conservation volunteer working on water quality in Iowa for more than thirty years. I have been a rural landowner for almost twenty-five years, and my spouse and I are doing conservation work on every acre we own. For us and for many other Iowans who care deeply about clean water and are acting accordingly, this proposed strategy, which should be a reason for hope, is turning out to be yet another reason to feel frustrated and angry.

Given current political realities, the State of Iowa may well decide to adopt this strategy. If that happens, the EPA should not accept it.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1284.

Timestamp 1/18/2013 5:10 PM

**Name** Linda D. Appelgate

**City** Des Moines

**State** Iowa

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

2835 46th Street

Des Moines, Iowa 50310

January 18, 2013

Mr. Bill Northey, Secretary

Iowa Department of Agriculture and Land Stewardship

Mr. Chuck Gipp, Director

Iowa Department of Natural Resources

C/o ANR Program Services

2101 Agronomy Hall

Iowa State University

Ames, Iowa 50011- 1010

Dear Mr. Northey and Mr. Gipp;

Thank you for the opportunity to comment on the Iowa Nutrient Reduction Strategy and for extending the comment period to January 18, 2013. My comments concern the non- point source aspects of the strategy.

While I appreciate a science-based approach to reducing nutrients in our waters, the science you reference addresses only technologies of what works on the landscape. That is only half the story. Where is the equally important science of who, what, where, when, why, and how landowners will voluntarily adopt these technologies? If a voluntary approach is to work, that is an equally important body of science missing in this strategy.

How many research dollars have been devoted to the science necessary to determine if farmers will voluntarily adopt conservation practices on a scale sufficient to make a measurable difference in our water?

Perhaps the science needed to understand whether voluntary landowner adoption will work to reduce nutrients and under what conditions is not addressed because the science we have is not reassuring. Two recent examples:

1. Iowa State University's own 2011 Iowa Farm and Rural Life poll shows that of the 1,276 farmers who responded, 77% had not visited their USDA service center (the site of all local, state, and federal soil conservation programs in each Iowa county) for the past two years. Additionally, when asked, if more funding and technical assistance were available, I would implement more conservation on the land I farm, 70% said either strongly disagree, disagree, or uncertain.

2. An Iowa State University study published January 9, 2013 titled "Watershed Sediment Losses to Lakes Accelerating Despite Agricultural Soil Conservation Efforts" studied Iowa's soil erosion over the past 150 years. Analyzing sediment core samples from 32 natural lakes, researchers showed that in 1900 it took 23 years for an inch of sediment to accumulate; today it takes only four years. ISU professor, John Downing, one of the study authors, said that in spite of spending \$250 billion over the decades to prevent soil erosion the study shows the amount of sediment washing downstream is growing rather than shrinking.

From personal experience, from 1987 to 1999 I served as an appointee of Iowa Governor Branstad to the State Soil Conservation Committee in the Iowa Department of Agriculture and Land Stewardship, including four years as chair. During those twelve years, I worked with countless farmers and soil conservationists. Almost to a person, conservation farmers and conservation professionals privately said, voluntary doesn't work with enough landowners. At the time, it was heresy to say those words publicly but their truth was painfully obvious on the landscape

## Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #1284.

Timestamp 1/18/2013 5:10 PM

**Name** Linda D. Appelgate

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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and in our water. Those words are equally true today.

I also worked as a resource conservationist and RC&D (resource conservation and development) coordinator for the USDA Natural Resources Conservation Service in Iowa from 2004 - 2011. Again, conservation professionals almost universally said (generally upon retiring) □ voluntary doesn't work with enough landowners.

Perhaps there is credible, science-based data showing that voluntarily adoption of conservation practices will work at a scale sufficient to reduce nutrients in our waters. If so, that data needs to be included in this strategy.

If such voluntary adoption data does not exist, we need to be honest about it and spend the time and money to determine if any exclusively voluntary program would work on a broad scale to reduce nutrients in our waters. If the answer is no, then we must work together to determine what regulatory policies and programs would be most reasonable and effective in protecting our waters and reducing nutrients in combination with voluntary programs.

Taxpayers investing millions of dollars in conservation need to know their dollars are going where they are most effective as documented by specific milestones and measurable effects on our water.

The proposed nutrient reduction document is, sadly, not a strategy. It is only the outline of a vision cynically set up for failure by recommending only voluntary adoption of conservation practices. It contains no specifics for implementation, no timelines, and no milestones or measures of success □ and no data to show that landowners are inclined to adopt conservation practices on any scale that would show measurable reduction in nutrients.

I sincerely hope that someday Iowa will have an effective plan for nutrient reduction in our waters. We desperately need it. Hundreds of farmers, scientists, policy makers, agency professionals, and concerned citizens are ready to assist in creating and implementing such a plan.

Sincerely,

Linda D. Appelgate

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1285**.

**Timestamp** 1/18/2013 5:14 PM

**Name** Gary Runyon D.V.M.

**City** Allerton

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Policy**

**Nonpoint Source**

**Point Source**

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I am writing in support of the nutrient strategy program developed by the state of Iowa. It is to be designed by state groups who will also enforce the program. It is local(Iowa)science based, well researched and flexible. It will help reduce the amount of N carried in our water and the amount of P removed if our soil washes. Spring time applications of N along with buffer strips, wetlands and bioreactors all are in use and do help. Most farmers are already doing less tillage (minimum till and no till) and we are starting to use more cover crops in the fall and winter. One problem with cover crops is that Federal Crop insurance programs currently prohibit cover crops if you want to insure your next summer's main crop. This needs to be changed.

I also read recently that the Brazos River in Texas flows into the Gulf of Mexico below the Mississippi Delta and its water stays on top of the salty water in the Gulf. This could be part of the cause of Gulf hypoxia.

Gary Runyon D.V.M.

2239 Highway S40

Allerton, IA 50008

641-870-0244

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1286**.

**Timestamp** 1/18/2013 5:15 PM

**Name** Kevin Ross

**City** Minden

**State** Iowa

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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January 9, 2013

Nutrient Reduction Strategy

ANR Program Services

2101 Agronomy Hall

Ames, IA 50011-1010

Dear Sir or Madam:

As a corn and beef producer from southwest Iowa, I support the voluntary and science-based approach of the nutrient reduction strategy. As a family farmer with two young sons, I care deeply about the soil and water resources that the next generation of Iowans will inherit, and it is important that the strategy is implemented successfully.

Because I raise crops and livestock, nutrient management is a daily concern for me. I know that some parts of my farm need different nutrient management practices than others. The same is true for the State of Iowa. The weather, soil, terrain, crops, and livestock can vary greatly across the state. This is why the voluntary approach is important because it allows farmers to use science and ingenuity to deal with varying conditions. Top down regulations do not guarantee success and only stifle the ingenuity of farmers.

I appreciate the great work that went into the science assessment. It shows that systems of in-field and edge-of-field practices are needed which regulations simply cannot duplicate. The assessment also shows that the effectiveness and costs of conservation practices vary widely and asking farmers to implement them will require financial and technical assistance.

The strategy is a roadmap, not turn-by-turn directions, and I appreciate the opportunity to provide input as the strategy develops. The State of Iowa will need to provide resources in order for the strategy to succeed, and I look forward to participating in future programs to address nutrient reduction.

Sincerely,

Kevin Ross

Minden, Iowa

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1287.

Timestamp 1/18/2013 7:11 PM

Name Dave Elias

City Iowa City

State Iowa

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

January 18, 2013

Adam Schnieders, DNR

Dustin VandeHoef, IDALS

John Lawrence, Iowa State University

Nutrient Reduction Strategy

ANR Program Services,

2101 Agronomy Hall,

Ames, Iowa 50011-1010

Re: Comments on Iowa Nutrient Reduction Strategy

Dear Sirs:

The City of Iowa City Wastewater Division supports the effort to improve water quality conditions in our community, the state, and on a national level. The City has endeavored to practice responsible stewardship related to water quality by investing a tremendous amount of money in the past 25 years. Mandated requirements, routine maintenance, and voluntary projects have been carried out that have helped us to meet compliance issues and further demonstrate, promote, and enhance the water environment within our control. Infrastructure investment by the Wastewater Division alone has amounted to nearly \$150,000,000 for a municipality of around 60,000 people. Besides that, annual operations and projects carried out by other city divisions would show an even larger investment and commitment to the water environment. The City and citizens of the community have made these efforts at a cost, although the results are not perfect and we see more could be done.

The City of Iowa City Wastewater Division must operate within limited financial and operational means, so it is imperative to us that our efforts go towards reasonable, equitable, cost effective and productive projects. The Executive Summary of the Iowa Nutrient Reduction Strategy states in the first paragraph:  it is designed to reduce nutrients in surface water &  in a scientific, reasonable, and cost-effective manner. The proposed Iowa Nutrient Reduction Strategy is not entirely in line with those principles for all parties that will be impacted by the  strategy .

The strategy does not correlate well with current EPA approaches to point source control of nutrients. The Iowa strategy must conform to the same use of terms and practices such as  water quality based, technology based, numeric nutrient criteria, nutrient limits, and narrative criteria . Without such conformance, no point source project approved by DNR will provide protection from further federal regulatory action and liability. This could result in projects being duplicated, costs wasted, fines levied for activities that were carried out in good faith but are interpreted by EPA to not meet the  letter of the law . It would not be reasonable or productive.

The Nutrient Control Strategy indicates that mandatory regulatory permits will be used to obtain the targeted reductions for point sources. The reduction target of 4% for nitrogen, for example, out the point source contribution of 8% is a small amount overall. However, the goal of achieving small reductions is not evenly spread to all point sources across the state. Only the 130 so-called  major sources would bear the burden, leaving many hundreds of other communities out of the effort simply because they would only achieve a  small result. Some small and some large communities have made conscientious decisions to provide facilities above and beyond their current needs and regulatory requirements. Their past efforts and investment would not be acknowledged while those communities who have made conscious decisions to avoid progressive steps toward contributing to water quality improvements would continue to be ignored. In Iowa, the economy, the culture and the use of natural resources are not really separated by urban and rural residences or businesses. No one in Iowa really lives more than 30 minutes from a cornfield and no one in Iowa really lives more than 30 minutes from a city. It is not particularly cost effective to achieve small reductions in nutrients. It is particularly not equitable to not ask everyone to try.

**Name** Dave Elias**City** Iowa City**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

The Nutrient Reduction Strategy cannot achieve its stated goals in the non-point source area either. It acknowledges that the largest contribution of nutrients comes from wide spread agricultural activities. The strategy expects to produce a 41% reduction in nitrogen, out of the 92% contribution from Ag, by voluntary practices. This approach does not acknowledge the lessons in progress toward water quality in the state from the 1972 Clean Water Act. Point source municipalities and industries did not build extensive treatment facilities voluntarily over the last 40 years. Yet today, there are Iowa municipalities and industries that seek to avoid even mandated regulatory compliance. In agricultural businesses, the same Iowa culture and practical avoidance results in water quality decisions being deferred or declined.

The evident agriculture approach is for bottom line profits, as in all business, rather than water quality. If water quality was a cost of doing business in agriculture, just as it has become a cost of living expense in municipalities, then there could be a more realistic expectation of change. The following excerpt from the Cedar Rapids Gazette on January 9, 2013 indicates the prevailing actions of the agriculture industry:

More ag drainage tile has been installed in Iowa during the past two years than in any other comparable period. (ISU Extension field agronomist)

Dips in combine yield monitor data showed exactly which of his Buchanan County fields were most in need of more tile. Quasqueton Farmer.

Farmers have money to spend, but land prices are so high they are investing in tile. Dense tiling can cost as much as \$1,000 per acre, but farmers quickly recoup their investment through the increased value and productivity of their land. Although almost all Iowa cropland has already been tiled, many farmers are installing more of the plastic drainage tubes in a practice known as pattern tiling (Tiling Contractor, past president of the Iowa Land Improvement Contractors Association)

<http://thegazette.com/2013/01/09/iowa-farms-with-good-drainage-systems-did-well-in-drou...> 1/9/2013

The use of voluntary approaches for implementing statewide Best Management Practices has not worked for water quality improvements so far. It is not a reasonable, equitable, or productive approach to expect this to change now.

The Iowa City Wastewater Division would like to see a successful Nutrient Reduction Strategy adopted for Iowa and the entire Midwest. For such a strategy to be successful it must be modified to include the following, at least:

1. Agreement with and conformance to federal EPA language, practice, legal acknowledgments and protections for point source contributors.
2. Application of the strategy in an equitable and reasonable manner to all contributors in the state.
3. Conformance of requirements for implementation and compliance to point source and non-point source contributors alike  major and minor, urban and rural.

This could enable real progress to be seen in water quality improvements in the state of Iowa at least.

Sincerely,

Dave Elias

Wastewater Division Superintendent

City of Iowa City

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1288**.

**Timestamp** 1/18/2013 7:12 PM

**Name** Danielle Van Ryswyk

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please support the science-based state nutrient reduction strategy. Adequate funding this program and other conservation cost share programs is important to Iowa. Danielle Van Ryswyk

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1289.

Timestamp 1/18/2013 7:40 PM

**Name** Greg Vitale

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Iowa waters are polluted and our water resources are marginalized. As a result, so are our outdoor recreational opportunities and the many businesses that could serve Iowans and regionally. Look no further than down the hill from the capital at the development along the greenbelt trails in downtown Des Moines which goes well beyond outdoor recreation.

The economic prospects of a community are related to the number of young professional with college degrees. These young professionals have many choices and often prefer areas with more recreational and enticing outdoor opportunities. Iowa and its communities are poorer for the way we under invest in our environment, including protecting our water resources.

Having consistently underestimated what is needed to make our dam made lakes more than expensive silt traps, we now commonly close beaches during parts of the summer due to the potential for diseases. This has been the situation with Hickory Grove in Story County the past two years where a triathlon was unable to swim. The same could be said for Big Creek and Saylorville.

The proposed voluntary standards for the rural multi-point sources of pollution is not realistic after decades of under investing in protecting the dam made lakes, water resources, and more generally, our parks and the environment. It is likely that the proposed voluntary standards are more likely to make the situation worse, just as relying on voluntary taxes would make a deficit worse.

Our economic future is inexorably tied to our investments, including our environmental investments and specifically our water resources which the state recklessly wastes and virtually gives this valuable asset away as if it were a disposal shopping bag of little import. Iowans and more generally, our neighbors downstream, deserve better. A meaningful proposal needs actual enforceable standards that will address the dire state of Iowa's many polluted lakes, rivers and other waters, based on science and the pivotal place water has in our lives and in economic development.

Gregory Vitale, Economist, American Canoe Association Instructor and Iowa Water Volunteer,

2510 Pierce Ave, Ames, IA 50010

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1290**.

**Timestamp** 1/18/2013 9:12 PM

**Name** Dale Patrick

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

---

Agriculture should be put under strict limits, enforced by law. Why should cities be restricted and agriculture put on their conscience?

Name christine ziebold

City Iowa City

State Iowa

Providing comment on the following sections:

<input checked="" type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input checked="" type="checkbox"/> Point Source

am writing as a pediatric infectious disease specialist, former assistant professor at University of Iowa, mother of a young boy and outdoor enthusiast. We moved from Minnesota to Iowa City in 2006. I have become aghast at the effects of Iowa's agribusiness operations on Iowa's natural resources, including fauna, flora and human health.

I find many Iowans unaware of how deeply disturbed their landscapes and ecosystems are, and how immense the problem of the "dead zone" in the Gulf of Mexico has become over the past 2 decades due to Iowa's ever increasing nutrient load flowing down the Mississippi River. It is especially the waste of 19.3 million swine, 3.98 million cattle, and 69.2 million poultry in the language of its business "produced annually", which dwarfs the domestic sewage of its mere 3 million humans, besides huge amounts of nitrogen and phosphorus from fertilizers.

The best kept secret may be that nutrient reduction at the source, here in Iowa, to help the far away macro-environment of the Gulf will also help the micro-environment of human bodies here in Iowa, where nitrates cause negative health effects; The Iowa Women's Health study showed elevated risk for ovarian, uterine, bladder and rectal cancers. Nitrates were classified as probable carcinogen (2A) only recently. Because nitrate levels have been so consistently elevated in our drinking water supplies, Iowans have earned the infamous distinction as the National Cancer Institute's preferred population to test associations of nitrate exposure and cancer.

Drastic and speedy changes in polluter behavior are needed. To continue business as usual and delay, as IDNR's "Iowa Nutrient Reduction Strategy" proposes, is therefore unethical. How delay tactics have helped interests of non-regulation has been convincingly demonstrated for the chemical industry; this so far toothless plan may be the test case for the delay game played by agribusiness interests, which are so thoroughly intertwined in Iowa political power, and thus the politically appointed leaders of regulatory agencies. The plan bears the mark of IDNR director Chuck Gipp's whose lack of qualification in conservation and his agro-economic interest are reflected in his voting record since 1995 and in sharp conflict with the IDNR mission.

IDNR's "Iowa Nutrient Reduction Strategy" is unacceptable.

I am concerned that the plan

- will not change the "poor or very poor" quality of 80 % of the monitored sites every summer, barring our family from recreational water use, and regularly expose us to temporary nutrient excess in overly chlorinated, nitrate spiked, and poorly tasting drinking water.
- moves even more costs to taxpayers, who already pay for Iowa's water conservation programs.
- furthers the farm sector's unwillingness to "own their load" and is part of a delay game.
- effectively guarantees continued profitability of unsustainable agribusinesses
- contradicts IDNR's mission to "conserve and enhance Iowa's natural resources and to ensure a legacy for future generations".

I have the following suggestions:

1. Polluters must pay.

- a. Agro-businesses (high spatial density of row crops and CAFOs) are clearly responsible for the bulk of the problem, as documented by IDNR, so the financial burden of agricultural pollution should absolutely not be shouldered by taxpayers.
- b. All farm businesses must start to treat manure like cities treat sewage, if they wish to discharge. All CAFO's should be required to get permits. Permit fees should be substantially increased to serve as a reasonable collateral for the potential damage inflicted by nutrient spillage. Part of the fee should go into a fund for emergency clean ups. If an applicant demonstrates that farm business insurance covers for spills, upfront permit fee could be lowered. Penalties should be levied for any nutrient discharge, spillage or runoff into waterways, and permits should be suspended until the root cause has been remedied. Thus the permitting process, now considered burdensome by CAFO owners/operators, could be greatly simplified.
- c. The State Revolving Fund, financed by sewer revenues, must no longer be used to address agro business pollution (presently Category VII-A. and B).
- d. Agro-business water pollution should no longer be considered a non-point source. Why it was and is largely exempt from the Clean Water Act is a (political) mystery. Clearly identifiable groups of farm owners are responsible in different waterway regions, and when in doubt they should be held responsible collectively.
- e. Since less than 10 % of nitrogen fertilizer is applied to non-agricultural grass its discontinuation would have negligible impact on the Gulf's hypoxia. However lawn fertilizer use by private citizens could be taxed with a "Gulf Hypoxia fee" or fertilizer sale could be completely prohibited, especially in Iowa's lawn-obsessed and prairie-deprived urban areas. Precedence for such rules and ordinances exist in multiple other, more environmentally conscientious states.

2. Mandate decreased water pollution by all nutrient users. Voluntary measures to clean up Iowa's water over the last 40 years since passage of the Clean water Act have completely failed and thus can no longer pass as sane proposals. Water clean-up and pollution prevention must become an IDNR #1 priority.

- a. Farm businesses must reduce water pollution by a MINIMUM of 45% (N) and 29%(P) by 2015, as part of the Gulf Hypoxia Taskforce target that IA agreed to.
  - b. Every future IDNR Agency Performance Plan must address water in all its core functions (enforcement, regulation, resource management).
3. Mandate minimum standard of care for nutrient users.
- a. Mandate numeric standards for nitrogen and phosphorus. An increasing number of extreme weather events means increased nutrient run off and needs to be taken into account.
  - b. Recommend all the conservation land use practices and edge of field practices for farmers that the science assessment outlined as minimum standards.
  - c. Use agricultural densities as a decision making tool in permitting.
  - d. Consider reductions in lawn fertilizer use in municipalities by 50% within 3 years.
  - e. Ban detergent phosphorus use, as 16 other states have.

f. Recommend storm water fee assessment based on the storm water runoff generated by impervious and pervious areas aka equivalent hydraulic area, as done in numerous other states (incl City of Minneapolis), in anticipation of EPA storm water regulations 2014.

g. Encourage municipalities to educate about and incentivize rain gardens. The Iowa Water and Land Legacy constitutional amendment from 2010 remains an unfunded mandate; if funded money could be used for this purpose.

4. Specify implementation of the plan. IDNR must prioritize the polluters, and the scenarios for nutrient reduction, and explain how it arrives at the prioritization, who will make decisions.

a. Publish how many (medium and large) sized CAFO's Iowa has for hogs, cattle and layers on IDNR's AFO website, including their ownership. I found wide variations in estimates how many medium and large CAFO's Iowa has at any given point in time (up to 8000). The present lack of data transparency does not serve the public, nor researchers. The IDNR website currently only publishes maps of AFO's, no

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #1291.

Timestamp 1/18/2013 9:36 PM

**Name** christine ziebold

**City** Iowa City

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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numbers . EPA publishes only Iowa's permitted ~ 1000 CAFO's , which is a fraction of the number of AFO's. EPA uses herd size, animal weight and manure handling system criteria, that are not published by USDA census to this detail to understand how it arrives at such a low # The last USDA Statistical service bulletin estimates tables of hog, cattle and layer AFO's >1000 head alone add up to 4,634. A lay person cannot reasonably calculate the numbers of medium and large CAFO's. There is a general belief, that IA's CAFO's are family owned, unable to afford upgrades, so facts to confirm or refute this are needed .

b. Set aggressive interim goals for nutrient reduction

c. Establish a semi-annual timeline for the reduction plan, since the target in 2015 is less than 2 years away.

d. Measure progress semi-annually, not annually as suggested, and post it on the IDNR website.

The lack of key components of quality improvement in the Iowa Nutrient Reduction Strategy document, but their existence in other IDNR documents (Planning for Water Quality Iowa's nonpoint source management plan from July 2012 for example ) is odd. It appears as if staff suggestions of these steps were edited or censored by top leadership. This (political) censorship would not unprecedented, as it has been reported from other states, but it should be made public.

Sincerely,

Christine Ziebold MD PhD MPH

PS: In the interest of transparency consider posting comments that other people have submitted, as is the custom with dockets of most regulatory agencies.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1292**.

**Timestamp** 1/18/2013 10:18

**Name** James Rubis

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I own a farm in Jefferson County in the Big Cedar Creek watershed. I see close hand that voluntary practices do NOT successfully control erosion/pollution problems. Mark S. Edwards, a 30 year Iowa DNR expertly summed up the situation in a letter to the D.M. Register. I expect he submitted comments. Just a couple of his lines:

" I...have inside knowlege of the budget-deprived, politcally-dominated mission of 'conserving and enhancing our natural resources.'..... These voluntary strategies will do little to slow the expanding debt of pollution.....Two thirds of Iowa's 39 million acres are drowned in chemicals for just two annual plants, corn and soybeans.....The deadly decision of voluntary compliace as floated by the water quality strategy is killing our world. "

Please go back to the drawing board with a new plan. lowans have poisoned the water of Iowa and the world for to long. The record shows we will not fix it ourselves. Regulations and restrictions MUST be put into place to stop the damage.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1293**.

**Timestamp** 1/18/2013 10:27

**Name** Duane Bodermann

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like to encourage you to continue to fund conservation cost share programs. It has been helpful in terracing and waterways we have done on our farm. If it were not for the cost share it would be difficult to do those projects. Duane Bodermann

**Name** Sally Gran

**City** Nevada

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I grew up playing in East Indian Creek, and still live nearby. Last year, we tested the creek for E. Coli and Fecal coliforms. It ranked at 3,300 colonies per 100 ml--far, far above safe levels for even recreating. Our creek is full of toxins from human and animal waste, and along with those toxins--a boatload of nitrogen and phosphorus. A waterway that should be a community resource has become a community hazard. Where might the excess excrement come from?

-Several farmers upstream allow their livestock to wallow in the creek, or have inadequate buffer or riparian areas to prevent runoff during rainstorms.

-Additionally, most of the houses in our area have outdated septic systems that overflow directly into the creek.

Iowa farmers work hard to feed the world, but in the meantime, we have starved fishermen in the gulf of their own source of food and livelihood. And, back in Iowa, we have starved our own little creek of much aquatic life.

To be effective, the Nutrient Reduction Strategy must include:

1. A timeline with firm objectives (to show whether or not the voluntary adoption has been successful in incrementally reducing nutrient pollution)
2. The opportunity for objectives to be met voluntarily, with incentives
3. Disincentives, penalties, or taxes that will be enacted if objectives on the timeline are not met voluntarily

Additionally, the following practices should be a part of the plan:

For rural residents:

-Update their septic systems, with financial assistance to those who need it, and tax incentives to all

For farmers:

-Practice better manure management, including installing riparian areas, shade trees, waterers, and fences around creeks to deter cattle from depositing excrement in or close to waterways

-Apply synthetic nitrogen fertilizers only in the spring

-Avoid over-applying synthetic fertilizers

-Plant cover crops to absorb excess nutrients, and build fertility (which would also improve and preserve our greatest resource-- our topsoil)

-Establish grass waterways, and buffer areas to reduce nutrient runoff from fields and pastures

For Legislators:

-Utilize some of Iowa's budget surplus to fund this plan, and enable it to be effective

One final note:

Iowa's nutrient reduction strategy needs to take into account the well-being of all of Iowa's citizens, not just those with the greatest wealth and lobbying power. I was very concerned to learn that parts of this strategy were lifted directly from text created by a political lobbying organization that tends to represent the interests of large agricultural businesses. Yes, it is critical to involve farmers and residents of a rural areas in the creation of this strategy. But, as a farmer, a rural Iowa resident, and a believer in a democracy in which citizens have equal rights, I do not feel that my interests are always represented by the aforementioned political organization, and the extreme viewpoint that farmers should never be restricted. Farmers are just like other people--we can be easily tempted to act in economic self-interest, rather than for the greater good.

## Iowa Nutrient Reduction Strategy

Online comment submissions

Page **2** of comment #**1294**.

**Timestamp** 1/18/2013 10:31

**Name** Sally Gran

**City** Nevada

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Our water is a resource we cannot afford to sacrifice in order to satisfy political allies. We cannot allow our water to be poisoned simply because it might be politically advantageous to delay real action. It is the job of government to ensure safety and order. Please take the steps that are necessary to give teeth to this plan. Add a timeline, make it voluntary at first (with incentives), but if it is not effective, there must be disincentives.

Thank you for considering public comment while making public policy!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1295**.

**Timestamp** 1/18/2013 11:09

**Name** Robert Brammer

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Count me for required practices, not just voluntary, to reduce excessive nutrients.

Count me for measurable targets and results, so in the future we have bench marks to determine if action and practices have made sufficient progress.

Count me overall for a strategy that swiftly and seriously makes progress on the nutrient overload that is harming our own waters and the Gulf of Mexico, progress that means solving this problem for good for decades to come and generations to come.

###

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1296.

Timestamp 1/18/2013 11:13

Name Jane Shuttleworth

City Okoboji

State Iowa

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

Thank you for the opportunity to comment on the Iowa Nutrient Reduction Strategy.

The purpose of the Iowa Nutrient Reduction Strategy is to assess and reduce nutrients to Iowa waters and into the Gulf of Mexico where excess nutrient loading has created chronic hypoxia  dangerously low oxygen levels  in a zone reputedly over 3000 square miles and growing.

The federal Clean Water Act provides a framework for states to address this problem. One tool of the CWA is the TMDL (Total Daily Maximum Load) program, in which states are required to identify impaired water bodies that do not meet their designated uses. Once identified as impaired, scientists prepare a TDML report with analysis of pollutant sources for each impaired water body and plan to restore them to their designated use. Since early 2000, Iowa has prepared TMDLs for over hundred water bodies, but after studying the Executive Summary I did not find any mention or reference of Iowa's TDML (Total Daily Maximum Load) programs.

Shouldn't the TMDL program be part of the nutrient reduction strategy?

My second comment regards the Report's lack of support for adoption of numeric nutrient criteria to set expectations and benchmarks for evaluating progress on nutrient reduction.

I understand that Iowa and other states are hesitant to set criteria for pollutants that are hard to measure, such as sediments and nutrients  yet they are our greatest water quality problem and we need benchmarks so we can measure progress. Other states have adopted nutrient criteria  we can learn from their experience. In November of 2012, for example, the US EPA formally approved the Florida Department of Environmental Protection's adoption of numeric nutrient standards pertaining to streams, spring vents, lakes, and south Florida estuaries. They have developed a hierarchical approach that gives preference to local, site specific information that best translates narrative information into numeric values. Why can't Iowa do the same? In fact, Iowa should be a leader in showing how this can be done!

Page 7 of the Report states point source waste water treatment dischargers would be the primary target of nutrient criterion rather than non-point source, but the Report does not explain why this has to be so, especially when nonpoint sources account for 92% of the total nitrogen and 80% of the total phosphorus entering Iowa streams annually (page 7,) compared to point source discharges  specifically sewage treatment plants  that account for approximately 8% of the total nitrogen and 20% of the total phosphorous entering Iowa's streams and rivers annually.

Why can't we use our American ingenuity to come up with creative solutions that will benefit agriculture and point sources alike, such as a cap and trade of pollutants on a say a HUC 9 watershed basis between both entities to a solution? We certainly have the knowledge, technology and expertise to cure this problem. Where I live in the Iowa Great Lakes the immediate economic and ecological benefits to protecting and improving water quality are understood and we have demonstrated willingness to commit resources and creative thinking to solve water quality problems as exemplified by our Dickinson County Water Quality Commission. We could serve as test models/starting points for adoption of nutrient criterion on a watershed basis in which point and non-point source pollution sources collaborate together to reduce nutrients instead of framing it as point vs non-point accountability war.

And speaking of lakes, Iowa has already developed its own nutrient criteria for lakes, they just need to be adopted. Why is there no mention in the Report that these standards exist? Why can't at least Iowa's lake nutrient standards be adopted to set a plan of action in motion?

Finally, I wonder why this report did not have a more robust public comment and outreach component on this very important issue for all Iowans. In 2009 public meetings were held in 7 communities in all parts of the state to receive input on proposed new rules on Iowa water quality standards. Isn't this as important?

Sincerely,

Jane Shuttleworth

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1297.

Timestamp 1/18/2013 11:46

**Name** Teresa Reed

**City** Tipton

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The voluntary portion of this proposal strikes me as the triumph of hope over experience. We've been offering these voluntary solutions to farmers for the entire length of time that the dead zone has been forming. Since the hypoxic area is not shrinking, voluntary efforts have clearly not met the need.

Therefore, I believe that starting with a regulation requiring a Nutrient Management Plan (following NRCS standard 590) is fair for both manure application and commercial fertilizer application. It makes economic sense; if a producer is overapplying nutrients, he/she is throwing money away. This would be an easy way to plug a leak of nutrients. The existing CCAs and agronomists could write the plans and be certified to check them. They could also report before and after nutrient application, which would be a quantifiable way to measure the difference in nutrient application.

An NMP is not a "one size fits all" approach - each is tailored to the farm's individual needs based on soil tests and economic benefit. This is one example of a broad regulation that is quite unique in the details, and can be applied to every farm that applies manure or commercial fertilizer.

This is only a starting point; producers still need to apply a range of solutions including cover crops, no till, buffer strips, etc. This is where the voluntary portion is quite valid. Conservation practices work together in a way that makes the whole greater than the parts, but it needs to start with not overapplying nutrients.

I know that "regulation" is a dirty word, and throwing it around makes one quite unpopular. However, this is one that will benefit farmers and the environment alike.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1298**.

**Timestamp** 1/19/2013 12:08

**Name** Ruthanne Harstad

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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As an Iowan born in the state who has traveled widely but remained an Iowa resident by choice, one of my biggest disappointments is Iowa's egregious concern for its lands and waters. Each year, I see more runoff far too many places, learn of more and more manure spills, and am alarmed by the increasing corporate agricultural industry taking over policy decisions. The citizens need clean water for recreation, drinking, and health.

The industry should not set policy, and much more regulation is needed, appropriate to farming types and terrain. Voluntary compliance is NOT enough!

Also, holding private meetings, not public, is unethical. The EPA is even ashamed of and reprimanding Iowa; what an image to present to the nation. Tourism suffers because so much of Iowa stinks now, and few, if any, lakes, streams, and rivers are attractive.

Ruthanne Harstad, Des Moines