

Water Quality Standards

Iowa has about 71,000 total stream miles. 26,000 of these miles are perennial streams, those that flow year round. 12,000 of the perennial streams have a designated use such as primary or secondary contact recreation and game fishable or limited resource streams. 14,000 perennial stream miles are not currently designated.

DNR's proposed rule designates all currently undesignated perennial and perennially pooled streams as primary recreation and game fishable streams with the highest protection. A second proposed rulemaking establishes the protocols for evaluating warm water streams to determine the designated uses for which they will be protected. Each designated use has a set of standards it has to meet, such as 10 mg/L nitrates for streams designated for drinking water.

A "protected flow" for a stream assumes there is a minimum water flow level to sustain aquatic life. The proposed rule eliminates the term protected flow. This means that DNR will now assume that all water in the state can sustain high quality aquatic life, and the water quality standards will apply to all water bodies regardless of water flow or current use.

"Effluent based streams" exist only because a discharge of water from a source. The proposed rulemaking eliminates the exemption from water quality standards for "effluent based stream flows." Effluent or discharge based streams would be required to meet water quality standards.

Talking Points

- ? I do not support the DNR's assumption that all perennial streams and perennially-pooled streams are swimmable and fishable. I do not believe that all perennial streams can or should be used for fishing and swimming. Designation of streams for fishing and swimming should only happen with scientific evaluation of each stream.
- ? Higher standards for water quality without evaluation is only setting up Iowa business and tax payers for unnecessary expense with little actual improvement to water quality. This rule making could cost Iowa citizens over a billion dollars. According to municipal wastewater groups, these rules could cost businesses and ratepayers up to \$1.5 billion to treat for ammonia and provide disinfection.
- ? Iowa has other options to comply with the Clean Water Act. The DNR proposal goes beyond the requirements under the Clean Water Act and what other states are implementing.
- ? These rules force a redirection of resources from real water quality challenges. The state should support the funding of voluntary water quality projects. Landowners are willing to voluntarily address water quality issues without regulatory rules. In 2005, funding for voluntary water quality programs was short of demand by \$116 million.
- ? Additional types of designated uses should be included for water bodies that have limited public access and for man-made water bodies such as farm ponds and drainage ditches.
- ? The DNR should continue to make a distinction for streams that flow solely because of effluent or discharge. These water bodies are not intended for fishing and swimming.