

Four Reasons to Oppose HF 2530

An Act requiring the Department of Natural Resources to identify specific animal sources of pollutants to a water of the state when determining the water's inclusion on a list of impaired waters.

1. It's expensive

Testing a water sample for *E. coli* costs at least \$11. Microbial source tracking (using qPCR to test a water sample for human, cow, pig, chicken and dog fecal DNA markers) costs at least \$135. Testing for additional species would raise the cost.

2. It's an unfunded mandate

The bill does not include additional funding for monitoring. Given the higher cost of microbial source tracking, this bill would reduce the number of waters that can be assessed each cycle.

3. It targets the wrong point in the process

The Impaired Waters List is primarily a waiting list for a water quality improvement plan or Total Maximum Daily Load. It makes sense to do microbial source tracking as part of a water quality improvement plan, to evaluate sources of pollution and how it can be prevented. It would also make sense to use MST to help prioritize where a water quality improvement plan is most needed, or most realistic. It does not make sense to spend money on microbial source tracking until *E. coli* testing shows there is a problem.

4. It keeps the public in the dark

The Impaired Waters list also helps Iowans choose where to go fishing and swimming, and which waters to avoid. We already don't know whether half our rivers and 40% of our lakes meet the recreation standard, because they haven't been tested. Another 75 rivers have high *E. coli* levels but were tested by an organization like mine that doesn't have a DNR-approved quality assurance plan, so they ended up on the list of Waters in Need of Further Investigation (WINFOI) list. This law would add several hundred more waters to the WINFOI list where we *do* have "credible data" to suggest a public health risk, adding to the confusion.