



March 19, 2026

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

**RE: Draft 2026 Impaired Waters List and Integrated Report**

Dear Water Quality Monitoring and Assessment Section:

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

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

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

## Waters in Need of Further Investigation (WINOFI)

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

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

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

## Class C impairments due to nitrate

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

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

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

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

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

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

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

/s/ Daniel Haug

Daniel Haug

Water Quality Specialist

Prairie Rivers of Iowa