



521 East Locust Street, Suite 220  
Des Moines, Iowa 50309-1939  
515.244.1194 phone  
515.244.7856 fax  
[iecmal@iaenvironment.org](mailto:iecmal@iaenvironment.org)  
[www.iaenvironment.org](http://www.iaenvironment.org)

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Joe Griffin, Environmental Specialist Senior  
Iowa Department of Natural Resources  
502 East 9<sup>th</sup> Street  
Des Moines, IA 50309

**Re: Comments on proposed rules regarding Iowa topsoil preservation requirements**

I am speaking on behalf of the Iowa Environmental Council, a coalition of over sixty Iowa environmental organization representing thousands of individual Iowans. I'm here to express the Council's support for keeping in place the existing topsoil preservation rule, which aids the infiltration of storm water runoff and reduces polluted runoff and the risk of flooding. We believe this rule is important for maintaining Iowa's healthy urban environments.

Urban creeks and streams can be especially vulnerable to bottom scouring and bank erosion due to large precipitation events or sudden snowmelt that contributes to urban flooding. These flood waters cause damage to property and make our cities less attractive places to live. In addition to flooding, urban storm water runoff washes pollutants such as fertilizer and pesticides into our rivers and lakes. This urban runoff is made worse when lawns do not have an adequate layer of topsoil that can absorb and hold water and instead are underlain by compacted clay that acts more like concrete than good Iowa soil. At a time when extreme precipitation and flooding events seem to be occurring more frequently in Iowa, we believe it would be unwise to weaken our existing topsoil protections.

While compliance with this rule may increase the purchase price of new homes, we believe those costs will be more than made up for over the life of the property. I would encourage you to note the number of Iowans who submitted comments to the stakeholder group complaining of the extra costs for irrigation, fertilizer, and soil amendments they disappointingly discovered were necessary in order to make their lawns grow. Homeowners have a right to assume that in Iowa, with some of the best soil quality in the nation, they can grow healthy grass, trees and other landscape plants on their lawns. We believe the cost for ensuring this basic function and value of healthy soil should be built into the purchase price of the property, not revealed as a cost to the homeowner after the fact.

Finally, with all of the attention, money, and effort put into Iowa's Nutrient Reduction Strategy over the last two years, we believe it would send a bad message for the Environmental Protection Commission to weaken existing environmental protections that reduce storm water runoff, and associated nutrient pollution, from urban development sites.

Sincerely,

Susan Heathcote  
Water Program Director  
Iowa Environmental Council