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July 14, 2026

Colin Tadlock

Soil Conservation and Water Quality Division

1305 East Walnut Street

Des Moines, Iowa 50319

RE: IEC Comments on IDALS Proposed 27—Chapter 21, Water Quality Protection Projects—Water Protection Fund

Dear Mr. Tadlock,

The following comment is submitted by the Iowa Environmental Council (IEC) on behalf of its members regarding the Iowa Department of Agriculture and Land Stewardship's (IDALS) proposed adoption of changes to 27—Chapter 21, Water Quality Protection Projects—Water Protection Fund.

IEC consists of nearly 100 member organizations, more than 500 individual members from across Iowa, and an at-large Board of Directors representing its membership. IEC is dedicated to advancing a safe, healthy environment and a sustainable future for Iowa. Its members value clean air and clean water and have a strong interest in protecting and restoring Iowa's natural resources through sound environmental policy and stewardship.

I. Support for Change to Local Water Districts Applications

IEC supports the proposed transition of Water Protection Fund (WPF) and Water Quality Protection Projects ("projects") administration to a collaborative framework between local soil and water conservation districts and IDALS. A more localized approach can ensure projects with the most potential to succeed receive proper funding and attention from state and local agencies. Consolidating program administration within the Division has the potential to improve administrative efficiency, simplify project review, and strengthen coordination of water quality protection efforts across the state.

II. Need for Measurable Targets and Accountability

While IEC appreciates the flexibility provided by project guidance, the proposed rule lacks objective standards that govern project selection, evaluation, and reporting. Moving these criteria outside administrative rule reduces transparency and may result in inconsistent implementation over time.

As WPF represents a limited public investment, funding should be directed to projects that demonstrate the greatest potential for measurable water quality improvements. IEC proposes that IDALS adopt measurable conservation and pollution reduction targets for projects receiving WPF assistance, beyond merely the stated goals of the applicant. Funding decisions should prioritize projects that clearly identify expected environmental outcomes, demonstrate cost-effectiveness, and include methods for measuring progress over the life of the project.

In addition, projects receiving WPF assistance should include appropriate accountability measures to ensure public funds are used as intended. Where participants fail to implement or maintain agreed-upon conservation practices without good cause, IDALS should retain authority to require corrective action or recover funds, as appropriate.

Rather than supporting conservation based solely on willingness to participate, WPF dollars can be more efficiently spent on projects that have well planned, measurable outcomes with accountability or the efficiency of the spending.

III. Conclusion

The proposed rules represent a positive step by IDALS to support local conservation needs and streamline assistance for Water Quality Protection Projects. However, setting clear targets for project administrators to achieve and ensuring responsible use of the funding are critical for making progress on water quality.

We appreciate the opportunity to submit comments on proposed 27—Chapter 21. If you have questions or we can clarify these comments further, please feel free to contact us.

Sincerely,

/s/ Michael Schmidt

Michael Schmidt
General Counsel
Iowa Environmental Council

/s/ Elijah Redington

Elijah Redington
Law Clerk
Iowa Environmental Council