

May 17, 2016

Comments to EPC by Susan Heathcote, Iowa Environmental Council

Re: Agenda Item 19 NOIA - Amendments to Iowa Antidegradation Implementation Procedure

My name is Susan Heathcote and I am the Water Program Director for the Iowa Environmental Council. Today I am commenting on Agenda Item 19 regarding the Notice of Intended Action relating to Iowa's Antidegradation Implementation Procedure.

The Iowa Environmental Council is opposed to the rule change because the proposed changes would weaken water quality protections and undermine our state goals to reduce water pollution that is harming our drinking water and recreational waters here in Iowa and downstream in the Mississippi River and Gulf of Mexico.

This petition comes to you at a time when Iowa's water quality decline has been identified as an urgent issue debated in the legislature and discussed in newspaper headlines across the state. The purpose of Iowa's Antidegradation Procedure is simple -- to preserve existing water quality by preventing unnecessary new or increased pollution. Preventing unnecessary new pollution is a common sense first step in any water pollution reduction effort.

The Antidegradation procedure includes a review of a range of treatment alternatives and requires the selection of the least degrading alternative that is practicable, economically efficient and affordable.

The current balanced procedure requires consideration of environmental benefits along with costs of the various alternatives and allows elimination of less degrading alternatives only if it can be demonstrated that the alternative is not economically efficient because the cost is disproportionate to the environmental benefit.

The proposed rule change removes consideration of environmental benefits in the economic efficiency determination and replaces it with a "bright line" standard that defines economic efficiency as "an alternative that costs less than 115% of the cost of the minimum level of pollution control."

Not only does this change not make sense in terms of comparing the efficiency of treatment alternatives, but the change completely removes consideration of the benefits of cleaner water which is the main purpose of the Antidegradation procedure.

All Iowan's – rural and urban—have an interest in clean water and a shared responsibility to reduce water pollution. Weakening Iowa's Antidegradation standards as recommended in this proposal would be a huge step backward.