March 27, 2015

Joe Griffin, Environmental Specialist Senior
Iowa Department of Natural Resources
502 East 9th 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