



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7**

11201 Renner Boulevard  
Lenexa, Kansas 66219

Ms. Kayla Lyon, Director  
Iowa Department of Natural Resources  
Wallace Building  
502 E. 9th Street  
Des Moines, Iowa 50319

RE: Approval of TMDL document for Lake Anita

Dear Ms. Lyon:

This letter responds to the algae Total Maximum Daily Load submission from the Iowa Department of Natural Resources for Lake Anita. This TMDL document was originally received by the U.S. Environmental Protection Agency Region 7 on July 25, 2022. Following comments from the EPA, final revisions were submitted on March 21, 2023.

Lake Anita was originally identified on the 2010 Iowa Clean Water Act Section 303(d) List as not supporting its primary contact recreation use due to excessive algae growth. Due to a clerical error, this impairment was translated into a cyanobacteria/cyanotoxin impairment beginning in 2016. Available data collected by the Iowa DNR supports an excessive algae growth impairment and does not support a cyanobacteria/cyanotoxin impairment. This submission fulfills the statutory requirement to develop TMDLs for impairments listed on a state's CWA Section 303(d) List and the clerical error will be corrected during the 2024 listing cycle. The specific impairment is:

<b><u>Water Body Name</u></b>	<b><u>WBIDs</u></b>	<b><u>Causes</u></b>
Lake Anita	IA 05-NSH-1435	Algae

The EPA has completed its review of the TMDL document with supporting documentation and information. By this letter, the EPA approves the TMDL document submitted March 21, 2023, for the algae impairment for Lake Anita. Enclosed with this letter is the Region 7 TMDL Decision Document which summarizes the rationale for the EPA's approval of the TMDL document. The EPA believes the elements of the TMDL described in the enclosed document adequately address the pollutant of concern, taking into consideration seasonal variation, critical conditions, and a margin of safety.

Although the EPA does not review the monitoring or implementation plans submitted by the state for approval, the EPA acknowledges the state's efforts. The EPA understands that the state may use the monitoring plan to gauge the effectiveness of the TMDL and determine if future revisions are necessary or appropriate to meet applicable water quality standards. The EPA recognizes that technical guidance

and support are critical to determining the feasibility of and achieving the goals outlined in these TMDLs. The implementation plan provided in this TMDL document provides options to achieve the loading reductions identified.

The EPA appreciates the thoughtful effort that the Iowa DNR has put into this TMDL. We will continue to cooperate with and assist, as appropriate, in future the Iowa DNR efforts to develop TMDLs. If you have any questions, contact Chelsea Paxson, of my staff, at (913) 551-7609.

Sincerely,

JAIME  
GAGGERO

Digitally signed by JAIME GAGGERO  
Date: 2023.04.13 07:08:41 -0500

for  
Dana Skelley  
Acting Director  
Water Division

Enclosure

cc: Lori McDaniel, Water Quality Bureau Chief, Iowa DNR  
Katie Greenstein, Water Quality Monitoring and Assessment Supervisor, Iowa DNR  
James Hallmark, TMDL Modeler, Iowa DNR

**United States Environmental Protection Agency  
Region 7  
Total Maximum Daily Load Approval**



**Lake Anita  
Cass County, Iowa**

**Algae**

for  
JAIME  
GAGGERO Digitally signed by JAIME GAGGERO  
Date: 2023.04.13 07:39:45 -0500  
Dana Skelley  
Acting Director  
Water Division

**4/13/23**

Date

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## EPA Region 7 TMDL Review

Submittal Date || Initial: July 25, 2022  
|| Final: March 21, 2023

Approved: Yes

ATTAINs Action Identifier	IA 05-NSH-1435
State	Iowa
Document Name	Lake Anita TMDL
Basin(s)	Upper Turkey Creek
HUC(s)	102400030301
Water Body(ies)	Lake Anita
Tributary(ies)	Unnamed tributaries
Number of Segments	1 Lake
Number of Segments for Protection 303(d)(3)	0
Causes	Recreational Use Impairment for Algae

### Submittal Letter and Total Maximum Daily Load Revisions

*The state submittal letter indicates final TMDL(s) for specific pollutant(s) and water(s) were adopted by the state and submitted to the EPA for approval under Section 303(d) of the Clean Water Act [40 CFR § 130.7(c)(1)]. Include date submitted letter was received by the EPA, date of receipt of any revisions and the date of original approval if submittal is a revised TMDL document.*

The Total Maximum Daily Load document was initially submitted by the Iowa Department of Natural Resources to U.S. Environmental Protection Agency Region 7 on July 25, 2022. Following comments from the EPA, revisions were submitted on January 6, March 13, and March 21 of 2023. The EPA approves the most recent version of the TMDL document.

### Water Quality Standards Attainment

*The targeted pollutant is validated and identified through assessment and data. The water body's loading capacity for the applicable pollutant is identified and the rationale for the method used to establish the cause-and-effect relationship between the numeric target and the identified pollutant sources is described. The TMDL(s) and associated allocations are set at levels adequate to result in attainment of applicable water quality standards [40 CFR § 130.7(c)(1)]. A statement that the WQS will be attained is made.*

The target pollutant, total phosphorus, was identified and validated through assessment and data. The Iowa DNR's review and interpretation of water quality provides justification for linking total phosphorus loads to the algae impairment. The TMDL document links the narrative standards to total phosphorus using the Spreadsheet Tool for Estimating Pollutant Loads (STEPL) and BATHTUB models.

This TMDL document calculates the maximum allowable loading capacity of total phosphorus to enable Lake Anita to attain and maintain the applicable narrative criteria. The loading capacity is calculated at the primary monitoring station in the lake, but the targeted total phosphorus loads apply at all points in the water body and designated contributing watershed.

The formula to calculate the TMDL is:

$$\text{Equation 1. } \text{TMDL} = \text{LC} = \Sigma\text{WLA} + \Sigma\text{LA} + \text{MOS}$$

Where: TMDL = total maximum daily load; LC = loading capacity;  $\Sigma\text{WLA}$  = sum of wasteload allocations (point sources);  $\Sigma\text{LA}$  = sum of load allocations (nonpoint sources); MOS = margin of safety (to account for uncertainty).

The daily maximum TMDL for Lake Anita is:

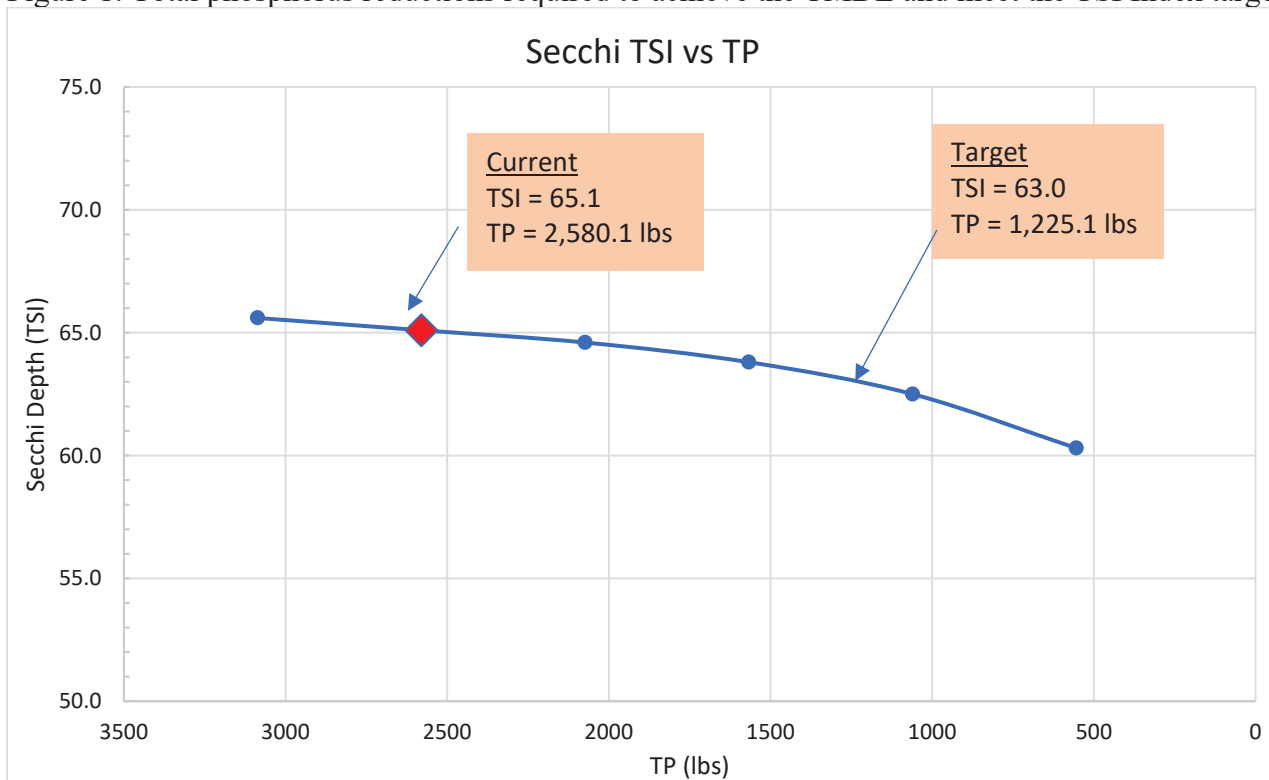
$$\text{Equation 2. } \text{TMDL} = \text{LC (10.5 lbs/day)} = \Sigma\text{WLA (0 lbs/day)} + \Sigma\text{LA (9.4 lbs/day)} + \text{MOS (1.1 lbs/day)}$$

The annual TMDL for Lake Anita is:

$$\text{Equation 3. } \text{TMDL} = \text{LC (1,225.1 lbs/day)} = \Sigma\text{WLA (0 lbs/day)} + \Sigma\text{LA (1,102.6 lbs/day)} + \text{MOS (122.5 lbs/day)}$$

The existing load of 2,580.1 pounds per year must be reduced by 1,355 lbs/year (approximately 53%) to meet the allowable TP load at Lake Anita (Figure 1).

Figure 1: Total phosphorus reductions required to achieve the TMDL and meet the TSI Index target.



The targets in this TMDL document are established at a level necessary to attain and maintain WQS.

**Designated Use(s), Applicable Water Quality Standard(s) and Numeric Target(s)**

*The submittal describes applicable WQS, including beneficial uses, applicable numeric and/or narrative criteria, and a numeric target. If the TMDL(s) is based on a target other than a numeric water quality criterion, then a numeric expression, site specific if possible, was developed from a narrative criterion and a description of the process used to derive the target is included in the submittal.*

Lake Anita has designated uses for primary contact recreation, aquatic life, and human health:

Primary Contact Recreational Use – Class A1: Waters in which recreational or other uses may result in prolonged and direct contact with the water, involving considerable risk of ingesting water in quantities sufficient to pose a health hazard. Such activities would include, but not be limited to, swimming, diving, water skiing, and water contact recreational canoeing (Iowa Administrative Code 567-61.3(1)(b)(1)).

Aquatic Life – Class B(LW): Artificial and natural impoundments with hydraulic retention times and other physical and chemical characteristics suitable to maintain a balanced community normally associated with lake-like conditions (Iowa Administrative Code 567-61.3(1)(b)(9)).

Human Health – Class HH: Waters in which fish are routinely harvested for human consumption or waters both designated as a drinking water supply and in which fish are routinely harvested for human consumption (Iowa Administrative Code 567-61.3(1)(b)(10)).

For antidegradation, the water body is considered a Tier 1 water which indicates that “Existing surface water uses and the level of water quality necessary to protect the existing uses will be maintained and protected” (Iowa Administrative Code 567-61.2(2)(a)).

The applicable narrative WQS are:

61.3(2) *General water quality criteria.* The following criteria are applicable to all surface waters including general use and designated use waters, at all places and at all times for the uses described in 61.3(1)"a."

- a. Such waters shall be free from substances attributable to point source wastewater discharges that will settle to form sludge deposits.
- b. Such waters shall be free from floating debris, oil, grease, scum and other floating materials attributable to wastewater discharges or agricultural practices in amounts sufficient to create a nuisance.
- c. Such waters shall be free from materials attributable to wastewater discharges or agricultural practices producing objectionable color, odor or other aesthetically objectionable conditions.
- d. Such waters shall be free from substances attributable to wastewater discharges or agricultural practices in concentrations or combinations which are acutely toxic to human, animal, or plant life.
- e. Such waters shall be free from substances, attributable to wastewater discharges or agricultural practices, in quantities which would produce undesirable or nuisance aquatic life.

To meet these narrative criteria, the state has targeted the numerical translator it would use to list/delist the water body. This value is a trophic state index of 63 for chlorophyll-a, which translates to target concentrations of 27.3 micrograms per liter for chlorophyll-a and 59.1 µg/L for total phosphorus. According to Iowa DNR methodology, the TSI must not exceed 63 in two consecutive listing cycles in order to remove the water body/pollutant from the impaired waters list for algal growth impairment to primary contact recreation. Ultimately, the requirements of the WQS narrative criteria must be achieved to delist this impairment for Lake Anita.

## **Pollutant(s) of Concern**

*A statement that the relationship is either directly related to a numeric WQS or established using surrogates and translations to a narrative WQS is included. An explanation and analytical basis is provided for expressing the TMDL(s) through surrogate measures or by translating a narrative WQS to a numeric target (e.g., parameters for sediment impairments, such as percent fines and turbidity, or excess algae impairments, such as chlorophyll-a and phosphorus). For each identified pollutant, the submittal describes the analytical basis for conclusions, allocations, and a margin of safety that do not exceed the loading capacity. If the submittal is a revised TMDL document, there are refined relationships linking the load to WQS attainment. If there is an increase in the TMDL(s), there is a refined relationship specified to validate that increase (either load allocation or wasteload allocation). This section will compare and validate the change in targeted load between the versions.*

The TMDL establishes a direct link between the narrative WQS and the target total phosphorus pollutant. Excessive nutrients can lead to eutrophic conditions associated with algal impairments, including excessive algae and potential toxins from cyanobacteria. This lake was listed as impaired for algae blooms beginning in 2010. During the 2016 cycle and system updates, this listing was altered to ‘Algal Growth: Cyanobacteria’ on Iowa’s ADBNet. This listing in ADBNet was translated into ‘Cyanobacteria Hepatotoxic Microcystins’ in the EPA’s ATTAINS system. After reviewing the data and discussing this matter with the state, the correct listing is for excessive algae.

The EPA agrees that the water quality target explained in the TMDL document is appropriate and will attain and maintain WQS.

## **Source Analysis**

*Important assumptions made in developing the TMDL document, such as assumed distribution of land use in the watershed, population characteristics, wildlife resources, and other relevant information affecting the characterization of the pollutant of concern and its allocation to sources, are described. Point, nonpoint, and background sources of pollutants of concern are described, including magnitude and location of the sources. The submittal demonstrates all significant sources have been considered. If this is a revised TMDL document any new sources or removed sources will be specified and explained.*

*In the absence of a national pollutant discharge elimination system permit, the discharges associated with sources were applied to the LA, as opposed to the WLA for purposes of this TMDL document. The decision to allocate these sources to the LA does not reflect any determination by the EPA as to whether these discharges are, in fact, unpermitted point source discharges within this watershed. In addition, by establishing these TMDL(s) with some sources treated as LAs, the EPA is not determining that these discharges are exempt from NPDES permitting requirements. If sources of the allocated pollutant in this TMDL document are found to be, or become, NPDES-regulated discharges, their loads must be considered as part of the calculated sum of the WLAs in this TMDL document. Any WLA in addition to that allocated here is not available.*

The TMDL document describes the history of the lake and its management, including previous restoration efforts for sediment reduction. The watershed area of Lake Anita is 2,491 acres with a watershed:lake ratio of 14.7:1. As there are no regulated point source discharges, including municipal separate storm sewer systems and concentrated animal feedlot operations, the load originates from nonpoint sources. The nonpoint and background sources of pollutants of concern for the watershed are described. Most of the land in the watershed is in pasture (42%) and the TMDL document indicates pastureland contributes approximately 30% of the phosphorus load; however, the highest phosphorus loading is attributed to row crops (37%). Additionally, the TMDL accounts for developed and urban areas, which comprise less than 5% of the watershed and contribute



approximately 10% of the phosphorus load. While not within the Lake Anita watershed, there is a golf course adjacent to the lake which would fall within this developed and urban category and has the potential to contribute phosphorus loading.

There are currently no CAFOs in this watershed. While the state has determined there are no animal feeding operations meeting criteria to require a federal NPDES permit in the watershed, there are four small animal feeding operations within a half mile radius of the watershed. Among these facilities, the total number of animal units per operation is less than 200 and they are not required to submit manure management plans. If it is determined that any such operation, including the four identified, is a CAFO that discharges, any future WLA assigned to the facility must not result in an exceedance of the sum of the WLAs in the TMDL as approved. In this TMDL the WLA is set at zero. Any new source or new discharge that will cause or contribute to the violation of WQS must comply with 40 CFR 122.4(i) and demonstrate there are sufficient allocations to allow for the discharge. For unpermitted large CAFOs, a precipitation-related discharge of manure, litter, or process wastewater from land application areas under the control of the CAFO shall be considered an agricultural stormwater discharge only where land application has been in accordance with site-specific management practices that ensure appropriate agricultural utilization of the nutrients and recordkeeping requirements have been met. See 40 CFR 122.23(e).

The TMDL explicitly states that any future development of facilities requiring a federal NPDES permit in the watershed will have a discharge of zero. Therefore, any new source or new discharge, including any CAFO must operate as a no-discharge facility. Any CAFO that does not obtain a NPDES permit must also operate as a no-discharge facility. Any discharge from an unpermitted CAFO is a violation of Section 301 of the Clean Water Act. It is the EPA's position that all CAFOs should obtain a NPDES permit because it provides clarity of compliance requirements. This TMDL decision document does not reflect a determination by the EPA that AFOs do not meet the definition of a CAFO nor that a facility does not need to obtain a permit. To the contrary, a CAFO that discharges has a duty to obtain a permit. Moreover, the EPA recommends that the state use its CWA inspection, permitting, CAFO designation, and enforcement authorities to ensure that all AFOs that should be regulated are required to have a NPDES permit.

As submitted, the TMDL document contains a complete listing of all known pollutant sources.

#### **Allocation - Loading Capacity**

*The submittal identifies appropriate loading capacities, including WLAs for point sources and LAs for nonpoint sources. If no point sources are present, the WLA is stated as zero. If no nonpoint sources are present, the LA is stated as zero [40 CFR § 130.2(i)]. If this is a revised TMDL document, the change in loading capacity will be documented in this section. All TMDLs must give a daily number, establishing TMDL "daily" loads consistent with the U.S. Court of Appeals for the D.C. circuit decision in Friends of the Earth, Inc. v. EPA, et al., No. 05-5015, (April 25, 2006).*

The TMDL document uses STEPL and BATHTUB models to determine the maximum total phosphorus the lake can receive and meet applicable WQS. The TMDL calculation is above in the WQS Attainment Section.

The annual average and daily maximum LCs are calculated at the primary monitoring station in the lake, but the targeted total phosphorus loads apply at all points in the water body and designated contributing watershed. The EPA agrees that the LCs will attain and maintain WQS.

### **Wasteload Allocation Comment**

*The submittal lists individual WLAs for each identified point source [40 CFR § 130.2(h)]. If a WLA is not assigned it must be shown that the discharge does not cause or contribute to a WQS excursion, the source is contained in a general permit addressed by the TMDL, or extenuating circumstances exist which prevent assignment of an individual WLA. Any such exceptions must be explained to a satisfactory degree. If a WLA of zero is assigned to any facility, it must be stated as such [40 CFR § 130.2(i)]. If this is a revised TMDL document, any differences between the original TMDL(s) WLA and the revised WLA will be documented in this section.*

There are no permitted WLAs in the watershed. The WLA is zero.

### **Load Allocation Comment**

*All nonpoint source loads, natural background, and potential for future growth are included. If no nonpoint sources are identified, the LA must be given as zero [40 CFR §130.2(g)]. If this is a revised TMDL document, any differences between the original TMDL(s) LA and the revised LA will be documented in this section.*

The LA is the amount of the pollutant load that is assigned to nonpoint sources and includes all existing and future nonpoint sources and natural background contributions. As presented in the Water Quality Standards Attainment Section, the LAs are calculated as the remainder of the LC after the allocations to the WLA and the MOS.

The TMDL document expresses the total phosphorus LA as an annual average of 1,102.6 pounds and a daily maximum of 9.4 pounds. While load estimates are made by land use/land cover, and the TMDL document provides examples of load reductions and BMPs effective for different land uses/land covers, the LA is given as a sum of all LAs and not subdivided by source.

The TMDL document has identified all known nonpoint sources of total phosphorus in the watershed.

### **Margin of Safety**

*The submittal describes explicit and/or implicit margins of safety for each pollutant [40 CFR § 130.7(c)(1)]. If the MOS is implicit, the conservative assumptions in the analysis for the MOS are described. If the MOS is explicit, the loadings set aside for the MOS are identified and a rationale for selecting the value for the MOS is provided. If this is a revised TMDL document, any differences in the MOS will be documented in this section.*

The TMDL document identifies an explicit 10 percent margin of safety. The TMDL document expresses the total phosphorus MOS as an annual average of 122.5 pounds and a daily maximum of 1.1 pounds. This MOS is reasonable because of the following model assumptions provided by Iowa DNR:

- The model shows good agreement between predicted and observed loadings, indicating that the model reasonably reflects the conditions in the lake.
- In-place BMPs were modeled at 50% of typical efficiency. This is a more conservative approach resulting in a larger phosphorus load entering the lake from the watershed.

Additionally, a laboratory quality control check is completed for all water quality data. Standards are evaluated for each sample batch and must be within +/-10% of the actual value. During sample analysis, duplicate samples are also evaluated by the laboratory. Based on available data from 2018 to 2020, the average difference from the duplicate samples was 5%.

The EPA agrees that the state has provided explicit MOS to support the TMDL and a reasonable explanation for the MOS that accounts for uncertainties in the TMDL analysis.

### **Seasonal Variation and Critical Conditions**

*The submittal describes the method for accounting for seasonal variation and critical conditions in the TMDL(s) [40 CFR § 130.7(c)(1)]. Critical conditions are factors such as flow or temperature which may lead to the excursion of the WQS. If this is a revised TMDL document, any differences in conditions will be documented in this section.*

The critical period is the growing season from April to September, which is when algae blooms and recreational use are most likely to occur. Approximately 73% of the rainfall in this watershed occurs during this period and total phosphorus loading is likely highest during this time. However, total phosphorus accumulation throughout the year and internal cycling can contribute to the algal growth impairment. To address this, the TMDL document expresses allowable total phosphorus loads as annual averages and daily maximums.

The EPA agrees that the state considered seasonal variation and critical conditions during the analysis of this TMDL and the setting of TMDL targets.

### **Public Participation**

*The submittal describes required public notice and public comment opportunities and explains how the public comments were considered in the final TMDL(s) [40 CFR § 130.7(c)(1)(ii)].*

The public was given an opportunity to provide feedback during the TMDL process through website postings and a virtual presentation. The TMDL document was posted for public review from May 20, 2022 to June 20, 2022. No comments were received.

The EPA agrees that the public has had a meaningful opportunity to comment on the TMDL document.

### **Monitoring Plan for TMDL(s) Under a Phased Approach**

*The TMDL identifies a monitoring plan that describes the additional data to be collected to determine if the load reductions required by the TMDL lead to attainment of WQS and a schedule for considering revisions to the TMDL(s) (where a phased approach is used) [40 CFR § 130.7]. If this is a revised TMDL document, monitoring to support the revision will be documented in this section. Although the EPA does not approve the monitoring plan submitted by the state, the EPA acknowledges the state's efforts. The EPA understands that the state may use the monitoring plan to gauge the effectiveness of the TMDL(s) and determine if future revisions are necessary or appropriate to meet applicable WQS.*

The TMDL document outlines future monitoring plans. This includes continued routine monitoring under the Iowa DNR Ambient Lake Monitoring Program. Implementation monitoring is identified to determine the effect of best management practices undertaken in the watershed; such monitoring could include automated samplers and grab samples during runoff events. Implementation monitoring would include a greater sampling frequency than current routine sampling accommodates and would require local stakeholder involvement.

### **Reasonable Assurance**

*Reasonable assurance only applies when less stringent WLA are assigned based on the assumption that nonpoint source reductions in the LA will be met [40 CFR § 130.2(i)]. This section can also contain statements made by the state concerning the state's authority to control pollutant loads. States are not required under Section 303(d) of the Clean Water Act to develop TMDL implementation plans and the EPA*

*does not approve or disapprove them. However, this TMDL document provides information regarding how point and nonpoint sources can or should be controlled to ensure implementation efforts achieve the loading reductions identified in this TMDL document. The EPA recognizes that technical guidance and support are critical to determining the feasibility of and achieving the goals outlined in this TMDL document. Therefore, the discussion of reduction efforts relating to point and nonpoint sources can be found in the implementation section of the TMDL document and are briefly described below.*

*The states have the authority to issue and enforce state operating permits. Inclusion of effluent limits into a state operating permit and requiring that effluent and instream monitoring be reported to the state should provide reasonable assurance that instream WQS will be met. Section 301(b)(1)(C) requires that point source permits have effluent limits as stringent as necessary to meet WQS. However, for WLA to serve that purpose, they must be stringent enough to meet WQS in conjunction with the water body's other loadings. This generally occurs when a TMDL's combined nonpoint source LAs and point source WLAs do not exceed the WQS-based LC and there is reasonable assurance that a TMDL's allocations can be achieved. Discussion of reduction efforts relating to nonpoint sources can be found in the implementation section of the TMDL document.*

There are no point sources located in this watershed. However, the TMDL document identifies a general approach for planning and implementation which could lead to the attainment of applicable water quality standards through management practices and structural BMPs that are expected to reduce nonpoint sources of total phosphorus. For row crop management, the implementation section of the document refers to BMPs such as conservation tillage, cover crops, and nutrient application techniques and timing. For pastureland/grazed land, the implementation section of the document refers to BMPs such as livestock stream exclusion and rotational grazing.



July 11, 2022

Jeff Robichaud  
U.S. EPA, Region VII  
11201 Renner Blvd.  
Lenexa, KS 66219

Subject: Submittal of Final Lake Anita (IA 05-NSH-1435) TMDL for EPA approval

Dear Mr. Robichaud:

The Iowa Department of Natural Resources (Iowa DNR) has completed the final Lake Anita TMDL and is submitting it for U.S. EPA approval. The lake was recently included on Iowa's 2022 303(d) list. Attached to this letter please find:

- Lake Anita, Cass County, Iowa, Total Maximum Daily Load for Algae

The draft TMDL was posted on the Iowa DNR's website on May 19, 2022 and comments were accepted from May 19, 2022 to June 20, 2022. A video recording of a standard public meeting presentation was posted to the Iowa DNR's website coincident with the opening of the Public Comment period. The Iowa DNR received no public comments on the draft.

Please accept this document for approval as the completed TMDL for Lake Anita.

Sincerely,

A handwritten signature in black ink that reads 'Kayla Lyon'.

Digitally signed by Kayla Lyon  
Date: 2022.07.21 11:21:41  
-05'00'

Kayla Lyon, Director  
Department of Natural Resources

Enclosure

**Water Quality Improvement Plan  
for**

**Lake Anita**

**Cass County, Iowa**

Total Maximum Daily Load for:  
Algae

**Prepared by:  
James A. Hallmark, P.E.**



Iowa Department of Natural Resources  
Watershed Improvement Section  
2023

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### List of Abbreviations

Units of measure:

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ac	acre	M	meter
cfs	cubic feet per second	mg	milligram
cfu	colony-forming unit	Mg	megagram (= 1 mt)
cm	centimeter	mi	mile
cms	cubic meters per second	mL	milliliter
d	day	mo	month
g	gram	mt	metric ton (= 1 Mg)
ha	hectare	orgs	<i>E. coli</i> organisms
hm	hectometer	ppm	parts per million
hr	hour	ppb	parts per billion
in	inch	s	second
kg	kilogram	t	ton (English)
km	kilometer	yd	yard
L	liter	yr	year
lb	pound		

Other abbreviations:

---

AFO	animal feeding operation
BMP	best management practice
Chl-a	chlorophyll a
<i>E. coli</i>	<i>Escherichia coli</i>
GM	geometric mean (pertains to WQS for <i>E. coli</i> , = 126 orgs/100 mL)
LDC	load duration curve
N	nitrogen
ortho-P	ortho-phosphate
P	phosphorus
SSM	single-sample max (pertains to WQS for <i>E. coli</i> , = 235 orgs/100 mL)
TN	total nitrogen
TP	total phosphorus
WQS	water quality standard

## General Report Summary

### What is the purpose of this report?

This report serves multiple purposes. First, it is a resource for increased understanding of watershed and water quality conditions in and around Lake Anita. Second, it satisfies the Federal Clean Water Act requirement to develop a Total Maximum Daily Load (TMDL) for impaired waterbodies. Third, it provides a foundation for locally-driven watershed and water quality improvement efforts. Finally, it may be useful for obtaining financial assistance to implement projects to remove Lake Anita from the federal 303(d) list of impaired waters.

### What's wrong with Lake Anita?

Lake Anita is listed as impaired on the 2022 303(d) list for not supporting its primary contact recreation designated use. The impairment is due to elevated levels of algae, which is caused by overly-abundant nutrients and sediment, including sediment-bound phosphorus in the lake.

### What is causing the problem?

The amount of phosphorus transported to the lake from the surrounding watershed is sufficient to cause excessive growth of algae, which reduces water clarity. Phosphorus is carried to the lake in two primary forms: (1) attached to eroded soil that is transported to the lake by rainfall runoff and stream flow, and (2) dissolved phosphorus in runoff and subsurface flow (e.g., shallow groundwater). Phosphorus and sediment within the water column and on the lake bed may become resuspended under certain conditions, which can add to algae issues. There are no allowable discharging point sources in the Lake Anita watershed; therefore, all phosphorus loads to the lake are attributed to nonpoint sources.

Nonpoint sources are discharged in an indirect and diffuse manner, and often are difficult to locate and quantify. Nonpoint sources of phosphorus in the Lake Anita watershed include gully erosion, sheet and rill erosion from various land uses, runoff and subsurface flows from lands that receive fertilizer application, grazed pasture land, poorly functioning septic systems, manure deposited by wildlife, and particles carried by dust and wind (i.e., atmospheric deposition). A portion of the phosphorus carried to the lake eventually settles to the lake bottom and accumulates. Under certain conditions, this accumulated phosphorus can become available for algal uptake and growth through an internal recycling process.

### What can be done to improve Lake Anita?

Reducing phosphorus loss from pasture and row crops and implementing or improving existing structural BMPs such as terraces, grassed waterways, and constructed sediment basins in beneficial locations will significantly reduce phosphorus loads to the lake. Increasing the trapping efficiency of the existing sediment basins may be the most cost-effective structural alternative. Additionally, in-lake practices such as targeted dredging may be necessary in order to address algae and turbidity concerns. Consideration should be given to rehabbing the existing ponds and wetlands in the watershed that have not been previously addressed.

### Who is responsible for a cleaner Lake Anita?

Everyone who lives, works, or recreates in the Lake Anita watershed has a role in water quality improvement. Nonpoint source pollution is unregulated and responsible for the vast majority of sediment and phosphorus entering the lake. Therefore, voluntary management of land, animals, and the lake itself will be required to achieve measurable improvements to water quality. Many of the practices

that protect and improve water quality also benefit soil fertility and structure, the overall health of the ecosystem, and the value and productivity of the land. Practices that improve water quality and enhance the long-term viability and profitability of agricultural production should appeal to producers, land owners, and lake users alike. Improving water quality in Lake Anita, while also improving the quality of the surrounding land, will continue to require collaborative participation by various stakeholder groups, with land owners playing an especially important role.

#### **Does a TMDL guarantee water quality improvement?**

The Iowa Department of Natural Resources (DNR) recognizes that technical guidance and support are critical to achieving the goals outlined in this Water Quality Improvement Plan (WQIP). The TMDL itself is only a document, and without implementation, will not improve water quality. Therefore, a basic implementation plan is included for use by local agencies, watershed managers, and citizens for decision-making support and planning purposes. This implementation plan should be used as a guide or foundation for detailed and comprehensive planning by local stakeholders.

Reducing pollutants from unregulated nonpoint sources requires voluntary implementation of best management practices. Many solutions have benefits to soil health and sustained productivity as well as water quality. However, quantifying the value of those ecosystem services is difficult, and those benefits are not commonly recognized. Consequently, wide-spread adoption of voluntary conservation practices is often difficult to achieve. A coordinated watershed improvement effort for Lake Anita could address some of these barriers by providing financial assistance, technical resources, and information/outreach to landowners to encourage and facilitate adoption of conservation practices.

#### **What are the primary challenges for water quality implementation?**

In most Iowa landscapes, implementation requires changes in land management and/or agricultural operations. Management decisions may include changes in the number of acres that are actively tilled and the diversity and rotation of crops produced. These changes present challenges to producers by requiring new equipment (e.g., no-till planters), narrowing planting, harvesting and fertilization windows, and necessitating more active and complex farm management.

Additionally, potential short-term losses in yields are more easily recognized and quantified than long-term benefits to soil health and sustained productivity. It is not easy to overcome existing incentives and the momentum of current practices. Promoting a longer-term view with an emphasis on long-term soil fertility, production, agroecosystem health, and reduced input costs will be essential for successful, voluntary implementation by willing conservation partners. However, water quality improvement and enhancement of Lake Anita as a recreational resource are certainly attainable goals, and are appropriate and feasible near-term goals for a coordinated watershed improvement effort.

## Required Elements of the TMDL

This Water Quality Improvement Plan has been prepared in compliance with the current regulations for TMDL development that were promulgated in 1992 as 40 CFR Part 130.7 in compliance with the Clean Water Act. These regulations and consequent TMDL development are summarized below in Table 1-1.

**Table 1-1. Technical Elements of the TMDL.**

Name and geographic location of the impaired or threatened waterbody for which the TMDL is being established:	Lake Anita, Waterbody ID, IA 05-NSH-1435, located in S32, T77N, R34W, 0.5 mile south- of Anita.
Surface water classification and designated uses:	A1 – Primary Contact B(LW) – Aquatic life HH – Human Health (fish consumption)
Antidegradation Protection Level	Tier 1
Impaired beneficial uses:	A1 – Primary Contact (IR 5a)
TMDL priority level:	Priority Tier 1
Identification of the pollutants and applicable water quality standards (WQS):	Aesthetically objectionable conditions due to algal and non-algal turbidity leading to very poor water transparency
Quantification of the pollutant loads that may be present in the waterbody and still allow attainment and maintenance of WQS:	Excess algae is associated with total phosphorus (TP). The allowable average annual TP load = 1,225.1 lbs/year; the maximum daily TP load = 10.5 lbs/day.
Quantification of the amount or degree by which the current pollutant loads in the waterbody, including the pollutants from upstream sources that are being accounted for as background loading, deviate from the pollutant loads needed to attain and maintain WQS:	The existing growing season load of 2,580.1 lbs/year must be reduced by 1,335.0 lbs/year to meet the allowable TP load. This is a reduction of approximately 53 percent.
Identification of pollution source categories:	There are no regulated point source discharges of phosphorus in the watershed. Nonpoint sources of phosphorus include fertilizer and manure from row crops, sheet and rill erosion from row crops and pasture, wildlife, septic systems, groundwater, atmospheric deposition, and others.
Wasteload allocations (WLAs) for pollutants from point sources:	There are no allowable point source discharges.

<p>Load allocations (LAs) for pollutants from nonpoint sources:</p>	<p>The allowable annual average TP LA is 1,102.6 lbs/year, and the allowable maximum daily LA is 9.4 lbs/day.</p>
<p>A margin of safety (MOS):</p>	<p>An explicit 10 percent MOS is incorporated into this TMDL.</p>
<p>Consideration of seasonal variation:</p>	<p>The TMDL is based on annual TP loading. Although daily maximum loads are provided to address legal uncertainties, the average annual loads are critical to in-lake water quality and lake/watershed management decisions.</p>
<p>Reasonable assurance that load and wasteload allocations will be met:</p>	<p>Reasonable assurances for reductions in nonpoint source pollution are provided by (1) a list of BMPs (see Section 4 of this WQIP) that would provide phosphorus reductions, (2) a group of nonstructural practices that prevent transport of phosphorus, (3) proposed methodology for prioritizing and targeting BMPs on the landscape, and (4) best available data for estimating the efficiency/reduction associated with BMPs.</p>
<p>Allowance for reasonably foreseeable increases in pollutant loads:</p>	<p>Although watershed development may continue in the future, an increase in the pollutant load from land use change is not expected.</p>
<p>Implementation plan:</p>	<p>An implementation plan is outlined in Section 4 of this Water Quality Improvement Plan. Phosphorus loading and associated impairments must be addressed through a variety of voluntary management strategies and structural practices.</p>

## 1. Introduction

The Federal Clean Water Act requires all states to develop lists of impaired waterbodies that do not meet water quality standards (WQS) and support designated uses. This list of impaired waterbodies is referred to as the state's 303(d) list. In addition to developing the 303(d) list, a Total Maximum Daily Load (TMDL) must be developed for each impaired waterbody included on the list. A TMDL is a calculation of the maximum amount of a pollutant that a waterbody can tolerate without exceeding WQS and impairing the waterbody's designated uses. The TMDL calculation is represented by the following general equation:

$$\text{TMDL} = \text{LC} = \sum \text{WLA} + \sum \text{LA} + \text{MOS}$$

Where:

- TMDL = total maximum daily load
- LC = loading capacity
- $\sum \text{WLA}$  = sum of wasteload allocations (point sources)
- $\sum \text{LA}$  = sum of load allocations (nonpoint sources)
- MOS = margin of safety (to account for uncertainty)

One purpose of this Water Quality Improvement Plan (WQIP) is to provide a TMDL for algae, which has decreased water quality in the lake. Another purpose is to provide local stakeholders and watershed managers with a tool to promote awareness and understanding of water quality issues, develop a comprehensive watershed management plan, obtain funding assistance, and implement water quality improvement projects. Over-abundance of phosphorus is largely responsible for excessive algal growth, which impairs the primary contact designated use of Lake Anita. The impairments are addressed by development of a TMDL that limits total phosphorus (TP) loads to the lake. Phosphorus reductions should be accompanied by reduced algal growth and increased water clarity.

The plan also includes descriptions of potential solutions to the impairments. This group of solutions is presented as a toolbox of best management practices (BMPs) for improving water quality in Lake Anita, with the ultimate goal of meeting water quality standards and supporting designated uses. These BMPs are outlined in the implementation plan in Section 4.

The Iowa Department of Natural Resources (DNR) recommends a phased approach to watershed management. A phased approach is helpful when the origin, interaction, and quantification of pollutants contributing to water quality problems are complex and difficult to fully understand and predict. Iterative implementation of improvement practices and additional water quality assessment (i.e., monitoring) will help ensure gradual progress towards water quality standards, maximize cost efficiency, and prevent unnecessary or ineffective implementation of costly BMPs. Implementation guidance is provided in Section 4 of this report, and water quality monitoring guidance is provided in Section 5.

This plan will be of limited value unless additional watershed improvement activities and BMPs are implemented. This will require the active engagement of local stakeholders and land owners. Experience has shown that locally-led watershed plans have the highest potential for success. The Watershed Improvement Section of the Iowa DNR has designed this plan for stakeholder use and may be able to provide technical support for the improvement of water quality in Lake Anita.



## 2. Description and History of Lake Anita

Lake Anita is located in Grant Township, Cass County approximately 0.5 miles south of the City of Anita. Lake Anita was constructed in the 1960's and is located within the 1,062-acre Lake Anita State Park owned and managed by the Iowa Department of Natural Resources. The lake and park area provide fishing, hiking, swimming and other outdoor recreation activities for the public.

Table 2-1 lists some of the general characteristics of Lake Anita and its watershed. Figure 2-1 shows the area map for the lake system and its watershed. Estimation of physical characteristics such as surface area, depth, and volume are based on a bathymetric survey conducted by the Iowa DNR in July of 2007.

### Improvements

In 2003 after the completion of a fishery renovation, native aquatic plants were introduced to the lake to help promote healthy levels of vegetation, which is important for water quality and fish habitat. In addition, between 2013 and 2015 with the help of NRCS, a sediment retention pond was designed and expanded on the east end of the northern branch of the lake. This work included raising a box culvert 4-feet and removing 8,000 cubic yards of sediment all in an effort to increase the sediment loading capacity and trapping efficiency of the pond. It was estimated that this work would benefit the lake for the next 30 years (IDNR, 2015).

**Table 2-1. Lake Anita Watershed and Lake Characteristics.**

<b>DNR Waterbody ID</b>	ID Code: IA 05-NSH-1435
<b>12-Digit Hydrologic Unit Code (HUC)</b>	102400030301
<b>12-Digit HUC Name</b>	Upper Turkey Creek
<b>Location</b>	Cass County, S32, T77N, R34W; 0.5 mile south of Anita
<b>Latitude</b>	41.4278° N (ambient lake monitoring location)
<b>Longitude</b>	-94.7810° W (ambient lake monitoring location)
<b>Designated Uses</b>	A1 – Primary Recreation B(LW) – Aquatic Life HH – Human health (fish consumption, drinking water)
<b>Antidegradation Protection Level</b>	Tier 1
<b>Tributaries</b>	Unnamed streams
<b>Receiving Waterbody</b>	Unnamed Tributary, Turkey Creek
<b>Lake Surface Area <sup>(1)</sup></b>	159 acres
<b>Length of Shoreline</b>	6.76 miles
<b>Shoreline Development Index</b>	3.83
<b>Maximum Depth <sup>(1)</sup></b>	33.2 feet
<b>Mean Depth <sup>(1)</sup></b>	13.1 feet
<b>Lake Volume <sup>(1)</sup></b>	2,094 acre-feet
<b>Watershed Area</b>	2,491 acres (includes lake)
<b>Watershed: Lake Ratio <sup>(2)</sup></b>	14.7:1
<b>Hydraulic Lake Residence Time <sup>(3)</sup></b>	386 days

(1) Per July 2007 bathymetric survey.

(2) (Watershed Area - Lake Area) / Lake Area

(3) BATHTUB model prediction for average annual conditions (2006-2021)

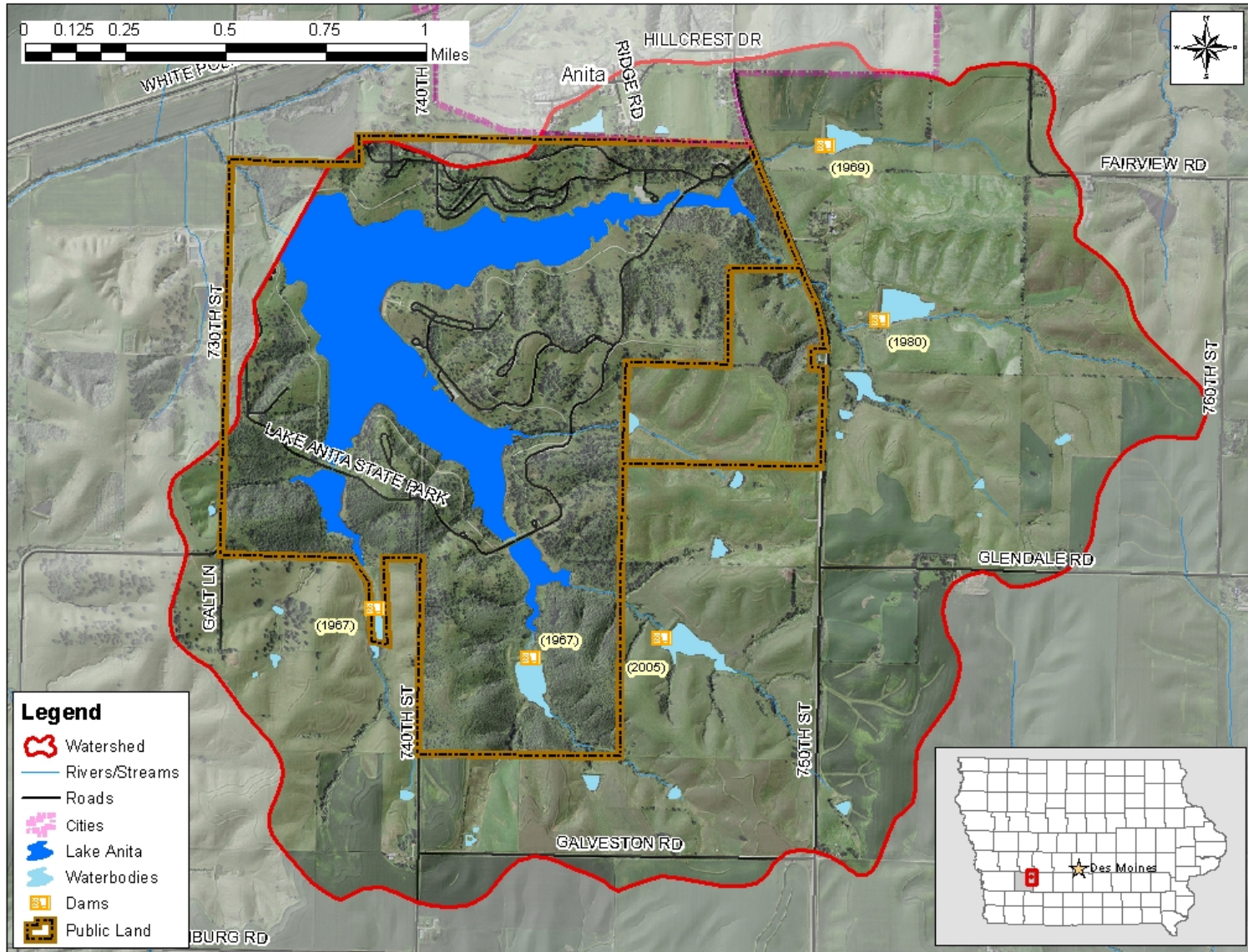


Figure 2-1. Area Map.

**Water Quality History**

Water quality data has been collected through the statewide survey of Iowa Lakes, which was conducted from 2000 through 2021 by Iowa State University (ISU). A statewide ambient lake monitoring program conducted in 2007 and 2008 by the State Hygienic Laboratory (SHL) also provided data on the water quality in Lake Anita.

However, for the purposes of this report, analysis will be performed using data from 2006-2021.

**2.1. Lake Anita**

*Hydrology*

Using the Thiessen Polygon method, it was determined that the Atlantic weather station best represented the average precipitation at Lake Anita. Daily precipitation data were obtained for the Atlantic Station from the Iowa Environmental Mesonet downloadable from the IEM.

Daily potential evapotranspiration (PET) data were obtained from the Iowa Ag Climate Network, downloadable from the IEM (IEM, 2021b). The Iowa State Climatologist provides quality control of these data. Daily observations between 2006-2021 were used in climate assessment and model development. Table 2-2 reports weather station information.

**Table 2-2. Weather Station Information for Lake Anita.**

<b>Data</b>	<b>Temperature/Precipitation</b>	<b>Potential ET</b>
<b>Network</b>	IACLIMATE	ISU AgClimate/ISU Soil Moisture
<b>Station Name (ID)</b>	Atlantic 1 NE (IA0364)	Lewis (A134759)
<b>Latitude</b>	41.42°	41.313°
<b>Longitude</b>	-95.00°	-95.173°

Source: <https://mesonet.agron.iastate.edu/climodat>

Average annual precipitation near Lake Anita for the analysis period was 37.3 inches. The annual average precipitation during this time period was just slightly higher than the 30-year annual average of 36.3 inches. During the analysis period, eight of the ten wettest years and five of the ten driest years on record since 1992 were recorded. Figure 2-2 illustrates the annual precipitation totals, along with lake evaporation (estimated as 100 percent of annual PET). This chart shows an inverse relationship between precipitation and lake ET, mainly due to climatological factors such as cloud cover and temperature.

Precipitation varies greatly by season in central Iowa, with approximately 73 percent of annual rainfall taking place in half of the year (April through September). Monthly average precipitation is illustrated in Figure 2-3, along with estimated evapotranspiration (ET) in the watershed based on vegetation cover. Although precipitation is highest during the growing season, so is ET, and a monthly moisture deficit occasionally occurs. Note that watershed ET is typically higher than lake evaporation in the summer months, a result of high temperatures and vegetation transpiring large volumes of moisture from the soil during the peak of the growing season. It is often during this period that harmful algal blooms develop in waterbodies, as water heats up and lake flushing is minimal.

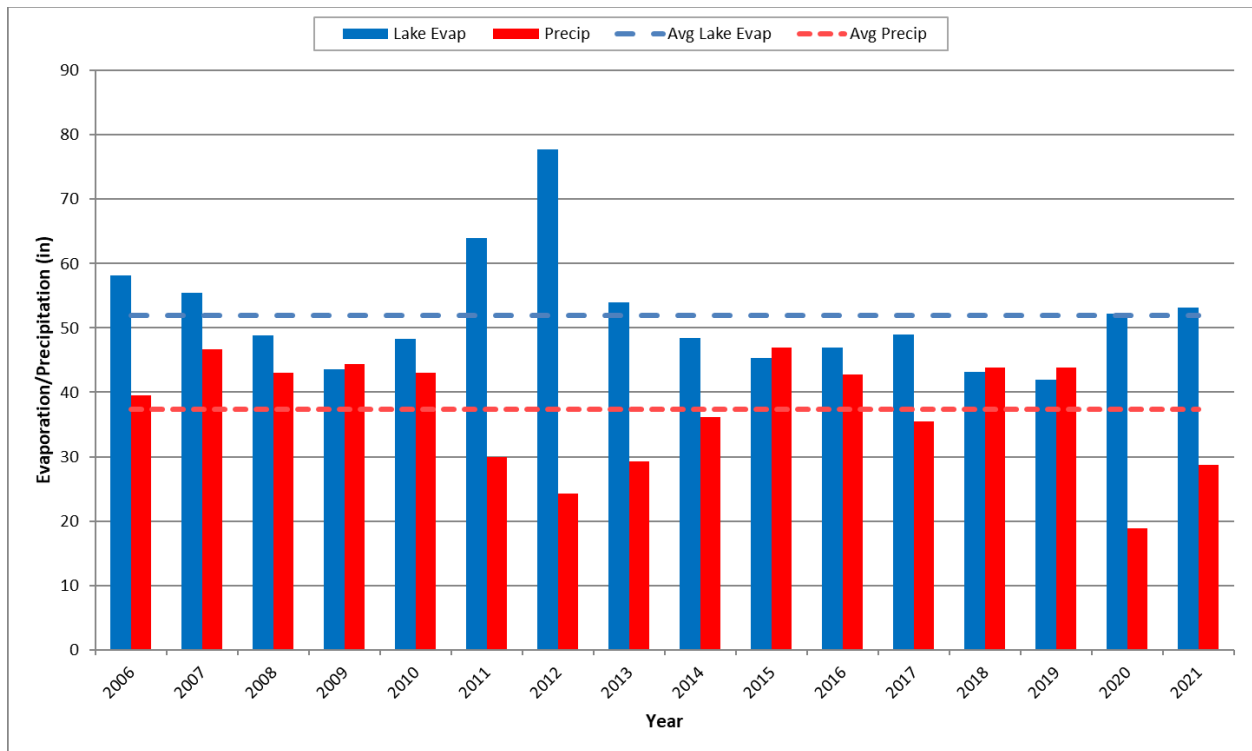


Figure 2-2. Annual Precipitation and Estimated Lake Evaporation.

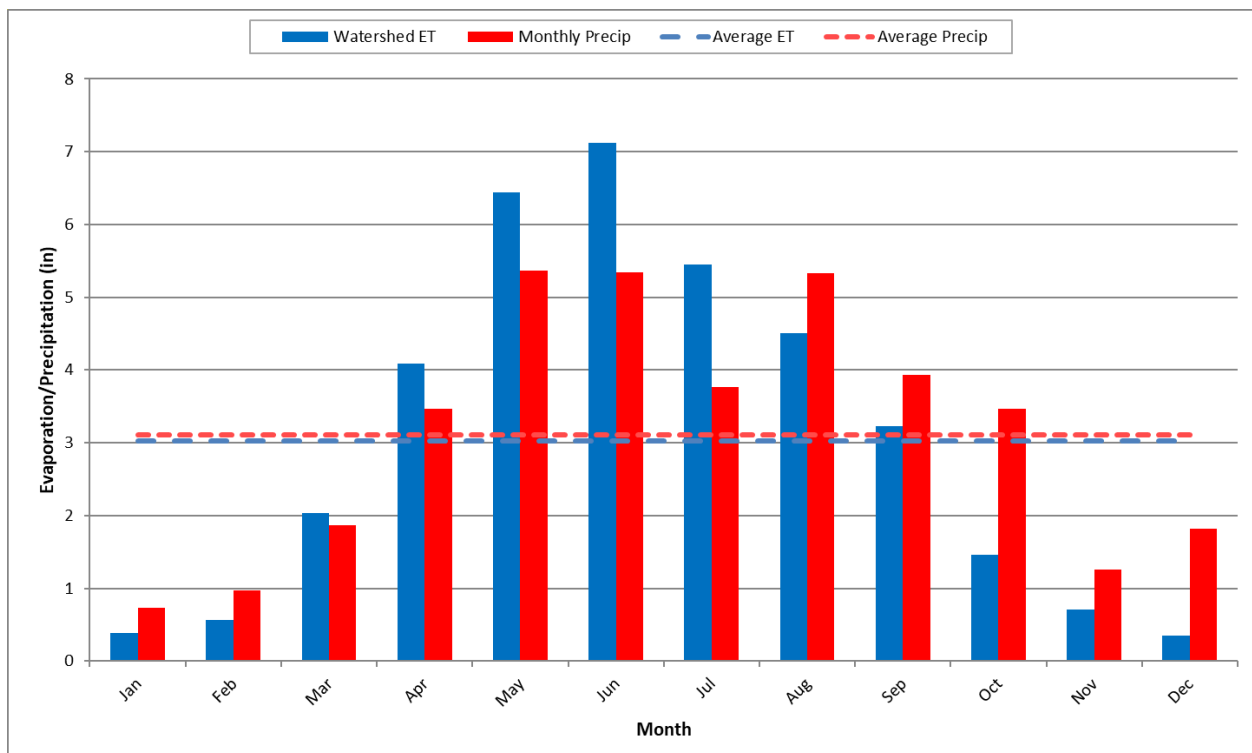


Figure 2-3. Monthly Precipitation and Estimated ET for the Watershed.

Rainfall runoff, direct precipitation, evapotranspiration, shallow groundwater flow, and deep aquifer recharge are all part of the lake's hydrologic system. Estimated residence time is based on annual precipitation and evaporation data, Spreadsheet Tool for Estimating Pollutant Load (STEPL) estimates of average annual inflow, and a water balance calculated within the BATHTUB model. The BATHTUB water balance calculation includes: inflows (from STEPL), direct precipitation, evaporation calculated from measured PET at Lewis, Iowa and lake morphometry.

During years of below average precipitation, residence time increases. In wet years, the opposite is true as residence time decreases. In lakes with smaller watershed to lake ratios the residence time may be longer than lakes with larger watershed to lake ratios.

#### *Morphometry*

According to the most current bathymetric data (July 2007), the surface area of Lake Anita is 159 acres. Estimated water volume of the main lake is 2,094 acre-feet (ac-ft), with a mean depth of 13.1 ft and a maximum depth of 33.2 ft in the northwestern section of the lake. The reservoir, like most man-made stream impoundments, has an irregular shape, with several small dissected arms that lead to upland overland flow paths. A shoreline index of 2.75, which is high, suggest that the watershed of Lake Anita has a large impact on lake water quality. Values greater than 1.0 suggest the shoreline is highly dissected and indicative of a high degree of watershed influence (Dodds, 2000). This influence can be in the form of sediment (and associated phosphorus) loading from the watershed. High indexes are frequently observed in man-made reservoirs, and it is not surprising that watershed processes are critically important for the chemical, physical, and biological processes that take place in Lake Anita. Lake morphometry and bathymetry data are shown in Figure 2-4.

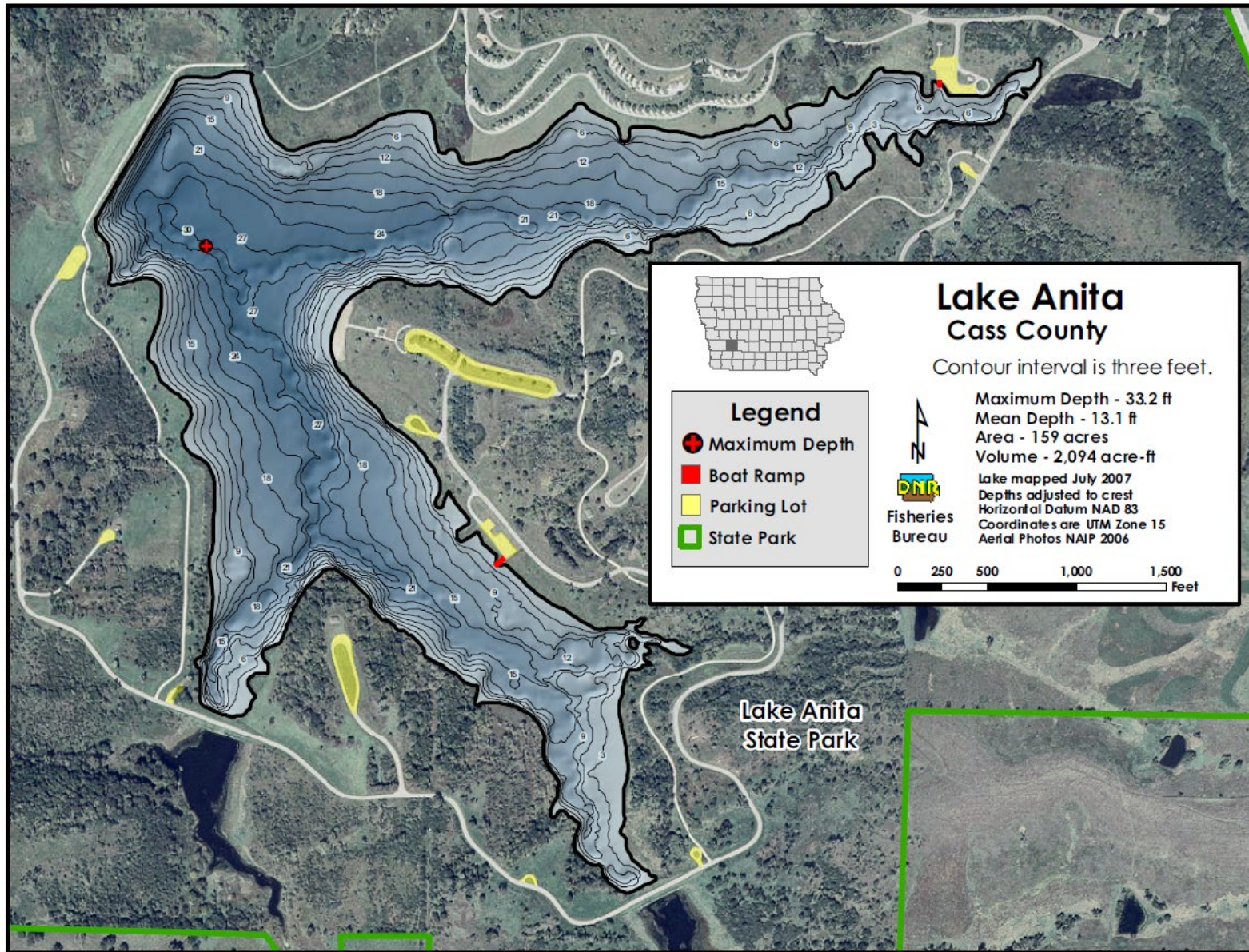


Figure 2-4. 2007 Bathymetric Map of Lake Anita

## 2.2. The Lake Anita Watershed

The watershed boundary of Lake Anita encompasses 2,491 acres (including the lake) and is illustrated in Figure 2-1. The watershed-to-lake ratio is 14.7:1. The larger the ratio the more influence the watershed has on the water quality in the lake and more mitigation efforts will be required in the watershed to see water quality improvements. Conversely, a smaller ratio indicates that the watershed may not influence water quality in the lake as much as in situ influences. The ratio of 14.7:1 means for every acre of lake there are 14.7 acres of watershed contributing runoff, sediment, and potential pollutants to the lake. This ratio also indicates a successful lake restoration program will be based on both watershed and lake-based solutions. Mitigation of watershed influence will be required and in-lake techniques may have short effective life spans in the absence of watershed improvements. A prudent watershed management strategy should focus on problem areas that can be most easily addressed and implementing alternatives that provide multiple benefits in addition to water quality, such as increased soil health, erosion reduction, and habitat enhancement. Watershed management and implementation strategies are discussed in more detail in Section 4 – Implementation Planning.

### Land Use

Land use information for the area was developed using the Cropland Data Layer (CDL) for 2019, which was obtained from the United States Department of Agriculture – National Agricultural Statistics Service (USDA-NASS,2019). Review of previous CDL’s and aerial photographs confirms that land use has changed very little, if any, since 2010. (2019\_NAIP). The dominate land use is pastureland, which makes up approximately 42 percent of the watershed. The next largest land use is a user defined land use, which makes up approximately 17 percent of the watershed. (Table 2-3 and Figure 2-5). User-Defined land use is an aggregate of un-grazed grassland, alfalfa, and Hay.

**Table 2-3. Lake Anita Watershed Land Uses.**

Land Use	Description	Area (acres)	Percent (%)
Forest	Bottomland, Coniferous, Deciduous	389.9	15.6
Pasture	Grazed Grassland	1,055.7	42.4
Residential	Farmsteads, Farm Buildings, Residential Development	26.3	1.0
Row Crop	Corn and Soybeans	305.6	12.3
Roads	Roads and Impervious Surfaces	79.7	3.2
User Defined	Un-grazed Grassland, Alfalfa/Hay	427.9	17.2
Water / Wetland <sup>(1)</sup>	Water and Wetland	206.3	8.3
<b>Total</b>		<b>2,491.4</b>	<b>100.0</b>

(1) Includes Lake Anita Surface Area.

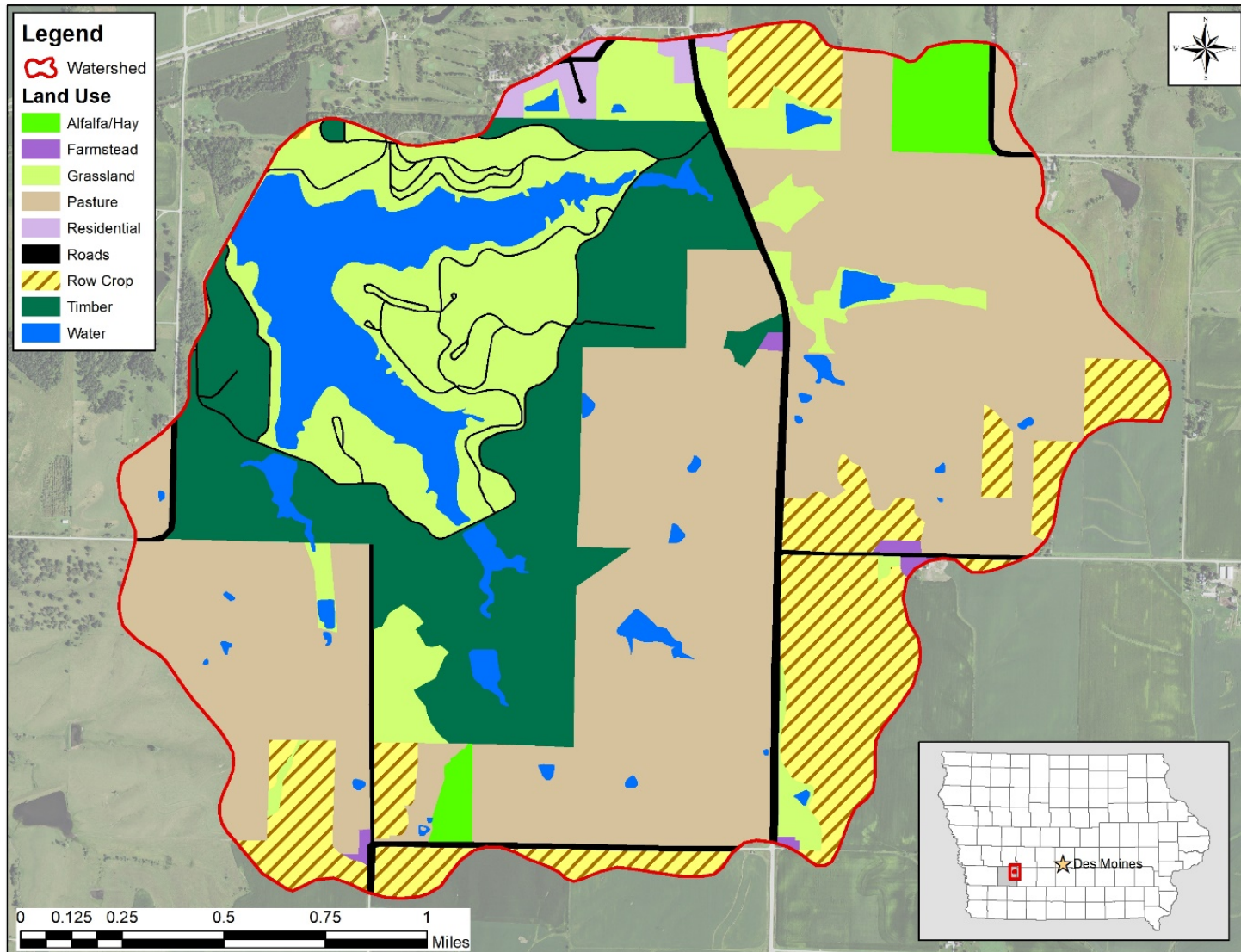


Figure 2-5. Lake Anita Watershed Land Use Map.



*Soils, Climate, and Topography*

The Lake Anita watershed is in the Southern Iowa Drift Plain. This landscape consists of rolling hills of Wisconsin-age loess on Illinoian till. Numerous rills, creeks, and rivers branch out across the landscape, shaping the old glacial deposits into steeply rolling hills and valleys (Prior, 1991).

As seen from Table 2-4 the Sharpsburg-Nira, Shelby, and Colo-Ely complex soils make up approximately 68 percent of the soils in the watershed. Table 2-4 shows the soils, area, percent area of the watershed, general description and typical slopes of each soil in the watershed (USDA-NRCS, 2022).

**Table 2-4. Predominant Soils of the Lake Anita Watershed.**

Soil Name	Area (ac)	Area (%)	Description	Hydric Soil Group	Typical Slopes (%)
Sharpsburg-Nira	641.0	25.7	Silty clay loam; moderately sloping to moderately steep, moderately well drained soils.	C	5-18
Shelby	541.9	21.8	Clay loam; strongly sloping to moderately steep, moderately well drained soils.	C	9-18
Colo-Ely Complex	500.4	20.1	Silty clay loam; gently sloping, somewhat poorly drained soils	C/D	2-5
Sharpsburg	272.9	11.0	Silty clay loam, nearly flat to gently, moderately well drained soils.	C	0-5
Water	183.9	7.4	--	--	--
9 Soil Types	351.3	14.0	---	A, C, & D	0-18
<b>Totals</b>	<b>2,491.4.0</b>	<b>100.0</b>	<b>Varies</b>		<b>Varies</b>

The elevations in the watershed range from a maximum of 1,442.7 feet North American Vertical Datum 1988 (NAVD 88) to a minimum of 1,277.2 feet NAVD 88. The average slope of the watershed is 10.6 percent with strongly sloping (8 -15 percent slope) regions making up a large percentage of the watershed at approximately 44 percent. Table 2-5 shows the percentage breakdown of slope classifications throughout the watershed, and Figure 2-6 illustrates the distribution of the slopes within the Lake Anita watershed.

**Table 2-5. Slope Classifications of the Lake Anita Watershed.**

<b>Slope Class (%)</b>	<b>Area (%)</b>	<b>Description of Slope Class</b>
Class A (0 – 2)	7.5	Nearly Flat
Class B (2 – 5)	11.9	Gently sloping
Class C (5 – 8)	15.9	Moderately Sloping
Class D (8 – 15)	43.6	Strongly Sloping
Class E (15 – 30)	20.2	Moderately Steep
Class F (> 30)	0.9	Steep to Very Steep
<b>Total</b>	<b>100.0</b>	---

The combination of soil classification, slope, topography, and hydrologic soil group (discussed more in Appendix D) indicate that the majority of agricultural areas in the Lake Anita watershed would not be tile drained. The absence of drainage district data and anecdotal data on tile drainage location also indicate that minimal drainage is present in the watershed. However, agricultural management practices related to tile drainage may change in the future, which would lead to changes in watershed loading and its effects on Lake Anita.

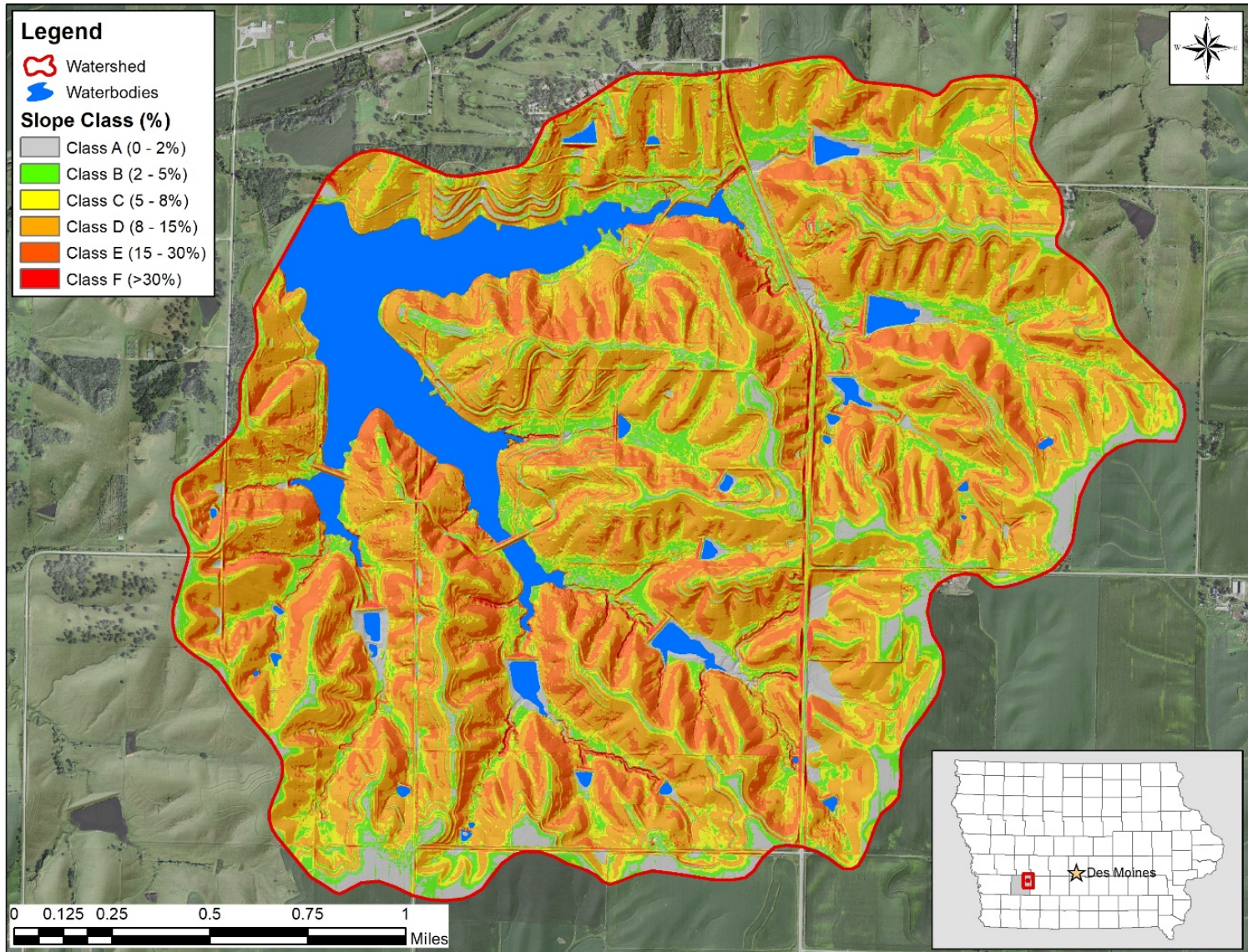


Figure 2-6. Slope Classifications in the Lake Anita Watershed.

### 3. TMDL for Algae

A Total Maximum Daily Load (TMDL) is required for Lake Anita by the Federal Clean Water Act. This section of the Water Quality Improvement Plan (WQIP) quantifies the maximum amount of total phosphorus (TP) the lake can assimilate and still fully support primary contact recreation in Lake Anita, which is impaired by algae. This section includes an evaluation of Lake Anita water quality, documents the relationship between algae and TP in Lake Anita, and quantifies the in-lake target and corresponding TMDL.

#### 3.1. Problem Identification

Lake Anita is a Significant Publicly Owned Lake, and is protected for the following designated uses:

Primary Contact Recreational Use – Class A1  
Aquatic Life – Class B(LW)  
Human Health – Class HH

The 2022 Section 305(b) Water Quality Assessment Report states that Class A1 (primary contact) designated uses in Lake Anita are assessed as “...not supported” due to algae blooms that violated Iowa’s narrative criteria protecting against aesthetically objectionable conditions.” (IDNR, 2022b). The 2022 assessment is included in its entirety in Appendix H, and can be accessed at <https://programs.iowadnr.gov/adbnet/Segments/1435/Assessment/2022>.

#### *Applicable Water Quality Standards*

The State of Iowa Water Quality Standards (WQS) are published in the Iowa Administrative Code (IAC), Environmental Protection Rule 567, Chapter 61 (State of Iowa - IAC, 2023).

In 2010 the State of Iowa enacted an antidegradation policy. This policy was designed to maintain and protect high quality waters and existing water quality in other waters from unnecessary pollution. Applicable protection levels (or tiers) as defined by the Iowa Administrative Code (IAC) 567-61.2 are cited below.

- *567-61.2(2)(a) Tier 1 protection. Existing surface water uses and the level of water quality necessary to protect the existing uses will be maintained and protected.*

Although the State of Iowa does not have numeric criteria for sediment, nutrients, or algae (chl-a), general (narrative) water quality criteria below do apply:

*61.3(2) General water quality criteria. The following criteria are applicable to all surface waters including general use and designated use waters, at all places and at all times for the uses described in 61.3(1)“a.”*

- a. Such waters shall be free from substances attributable to point source wastewater discharges that will settle to form sludge deposits.*
- b. Such waters shall be free from floating debris, oil, grease, scum and other floating materials attributable to wastewater discharges or agricultural practices in amounts sufficient to create a nuisance.*
- c. Such waters shall be free from materials attributable to wastewater discharges or agricultural practices producing objectionable color, odor or other aesthetically objectionable conditions.*

- d. *Such waters shall be free from substances attributable to wastewater discharges or agricultural practices in concentrations or combinations which are acutely toxic to human, animal, or plant life.*
- e. *Such waters shall be free from substances, attributable to wastewater discharges or agricultural practices, in quantities which would produce undesirable or nuisance aquatic life.*

For 303(d) listing purposes, aesthetically objectionable conditions are present in a waterbody when Carlson’s Trophic State Index (TSI) for the median growing season chl-a exceeds 65 (IDNR, 2022). In order to de-list the algae impairments for Lake Anita, the median growing season for chl-a TSI and Secchi depth TSI must not exceed 63 for two consecutive listing cycles, per DNR de-listing methodology.

#### *Problem Statement*

Water quality assessments indicate that Lake Anita is impaired because primary contact uses in the lake are “...not supported” due to algae blooms that violated Iowa’s narrative criteria protecting against aesthetically objectionable conditions ...” (IDNR, 2022b). High levels of algal production fueled by phosphorus loads to the lake cause the impairment. TP loads must be reduced in order to reduce algae and fully support the lake’s designated uses. Excess nutrients, particularly phosphorus, can cause eutrophic conditions associated with the impairments to Lake Anita. Phosphorus laden sediment deposits can also cause transparency issues.

#### *Data Sources and Monitoring Sites*

Sources of data used in the development of this TMDL include those used in the 2022 305(b) report, several sources of additional water quality data, and non-water quality related data used for model development. Sources include:

- Ambient Lake Monitoring and / or TMDL monitoring including:
  - results of available statewide surveys of Iowa lakes sponsored by the Iowa DNR and conducted by Iowa State University 2000-2021. (IDNR, 2022c).
- Precipitation data at Atlantic, Iowa, the ISU Iowa Environmental Mesonet. (IEM, 2021a)
- PET data at Lewis, Iowa, the ISU Ag Climate Network (IEM, 2021b).
- 3-m Digital Elevation Model (DEM) (State of Iowa-OCIO, 2022a)
- SSURGO soils data maintained by United States Department of Agriculture –Natural Resource Conservation Service (USDA-NRCS, 2022).
- Aerial images (State of Iowa-OCIO, 2022b).
- Lake bathymetric data collected in July 2007 (IDNR, 2022d).

#### *Interpreting Lake Anita Data*

The 2022 305(b) assessment was based on results of the ambient monitoring program conducted from 2016 through 2020 by ISU. Assessment of available in-lake water quality in this TMDL utilized available ISU data from 2006-2021. All in-lake data was collected at the ambient monitoring location, which is shown in Figure 3-1. Development of the in-lake target, the TMDL, and impairment status are based on data collected at this location, per DNR assessment methodology. In-lake water quality data is shown in Appendix C.

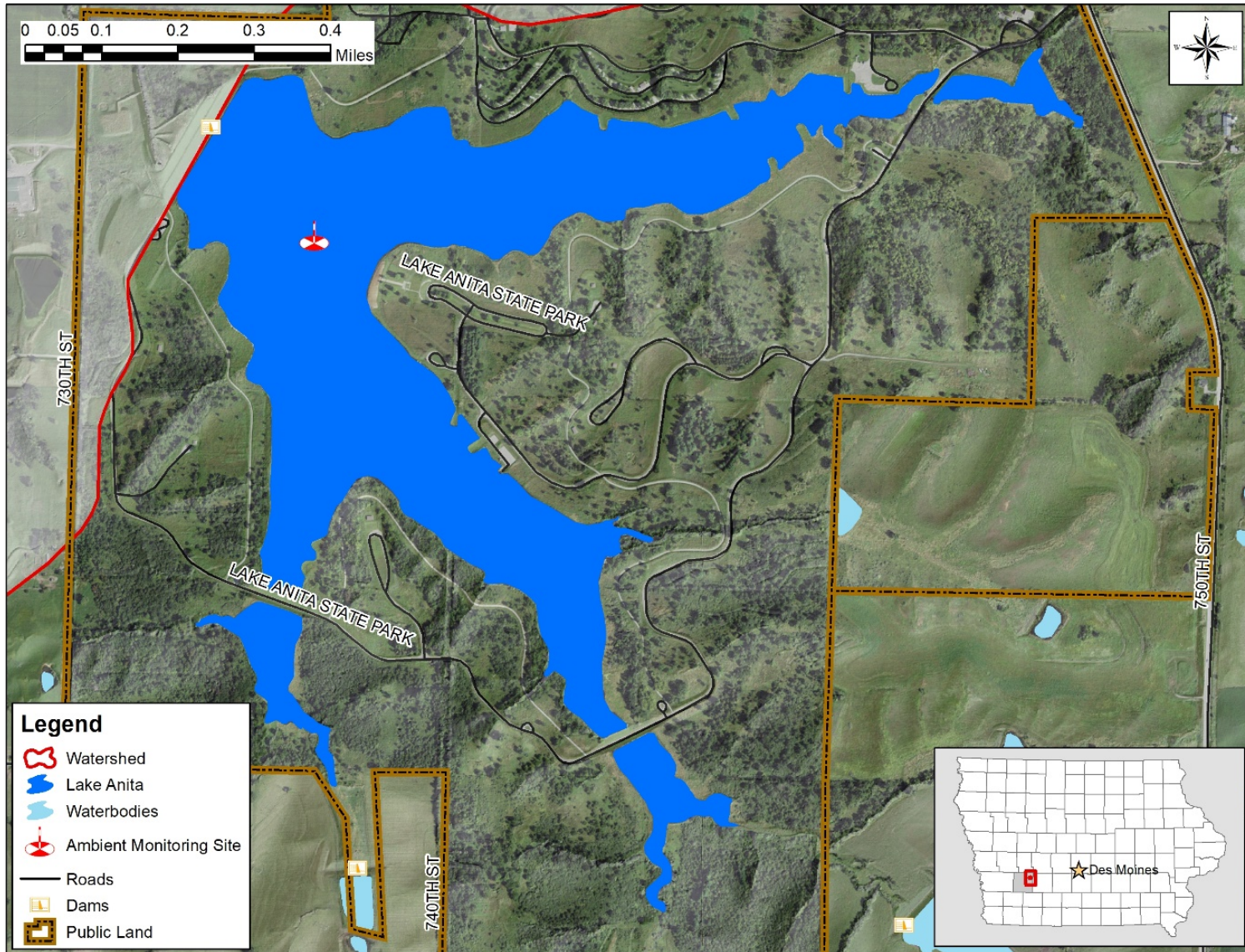


Figure 3-1. Ambient Monitoring Location for Water Quality Assessment.

Carlson’s Trophic State Index (TSI) was used to evaluate the relationships between TP, algae (chl-a), and transparency (Secchi depth) in Lake Anita. TSI values are not a water quality index but an index of the trophic state of the water body. However, the TSI values for Secchi depth and chl-a can be used as a guide to establish water quality improvement targets.

If the TSI values for the three parameters are the same, the relationships between the TP, algae, and transparency are strong. If the TP TSI value is higher than the chl-a TSI, it suggests there are limitations to algal growth besides phosphorus. Figure 3-2 is a plot of the individual TSI values throughout the analysis period (2006-2021). TSI values that exceeded the 303(d)-listing threshold of 65 (for chl-a and Secchi depth) are contained within the orange box and TSI values from the 2022 305(b) (2016-2020) assessment period are within the blue box. Table 3-1 are the average and median TSI values for Lake Anita during the 2022 305(b) assessment period (2016-2020).

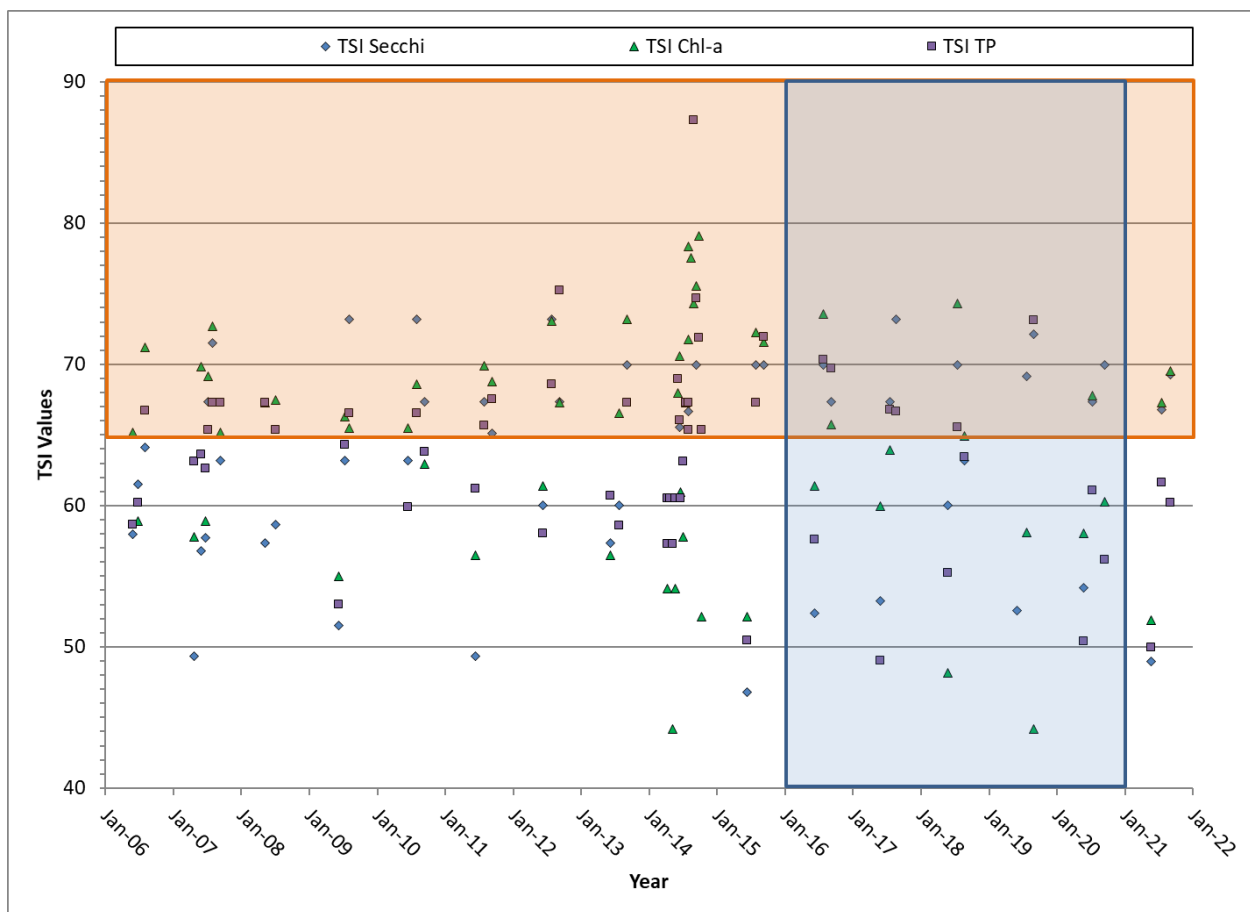


Figure 3-2. TSI Values for Individual Samples in the Analysis Period.

Table 3-1. TSI Values, Lake Anita for Assessment Period (2016-2020).

	Secchi Depth	Chlorophyll-a	Total Phosphorus
Average TSI Values	64	57	59
Median TSI Values	67	60	61

Annual median TSI values for the analysis period can be seen in Figure 3-3. Table 3-2 shows the overall average and median TSI values for Secchi depth, chl-a, and TP for the analysis period for Lake Anita. The water clarity trend for the analysis period shows an increasing TSI value for Secchi depth, which indicates a decreasing Secchi depth. The trend for both TSI TP and TSI chl-a (algae) is decreasing which indicates a decrease in phosphorus and chlorophyll concentrations, respectively. It should be noted that chl-a and TP TSI values appear to be abnormally low in 2019 skewing the trend line. Eliminating the 2019 data from the analysis shows a similar result, however the trend line for TP and chl-a TSI are not as steep as shown in Figure 3-4. Table 3-3 describes the implications of TSI scores on attributes of lakes.

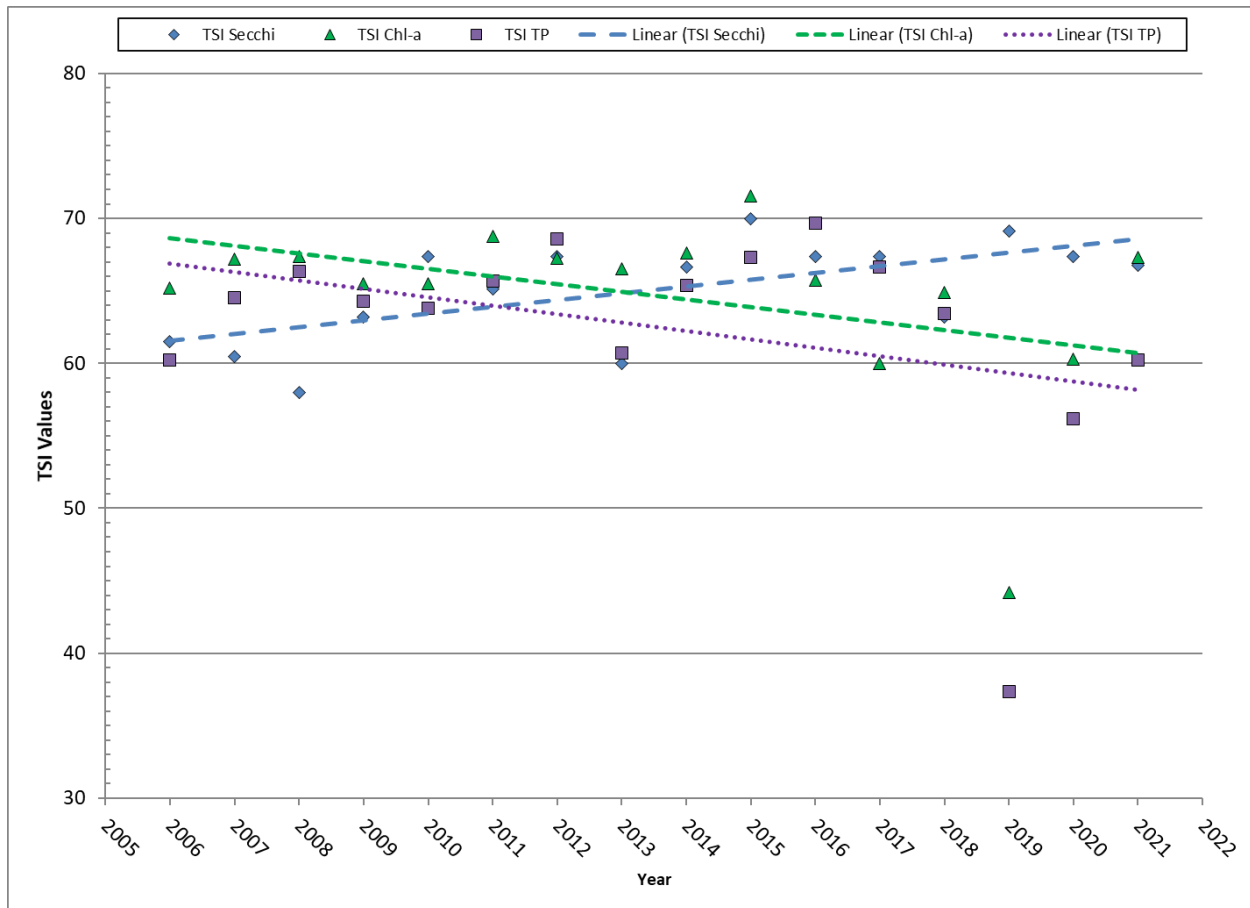


Figure 3-3. Annual Median TSI Values.

Table 3-2. Overall TSI Values (2006-2021).

	Secchi Depth	Chlorophyll-a	Total Phosphorus
Average TSI Values	63	63	64
Median TSI Values	65	65	65



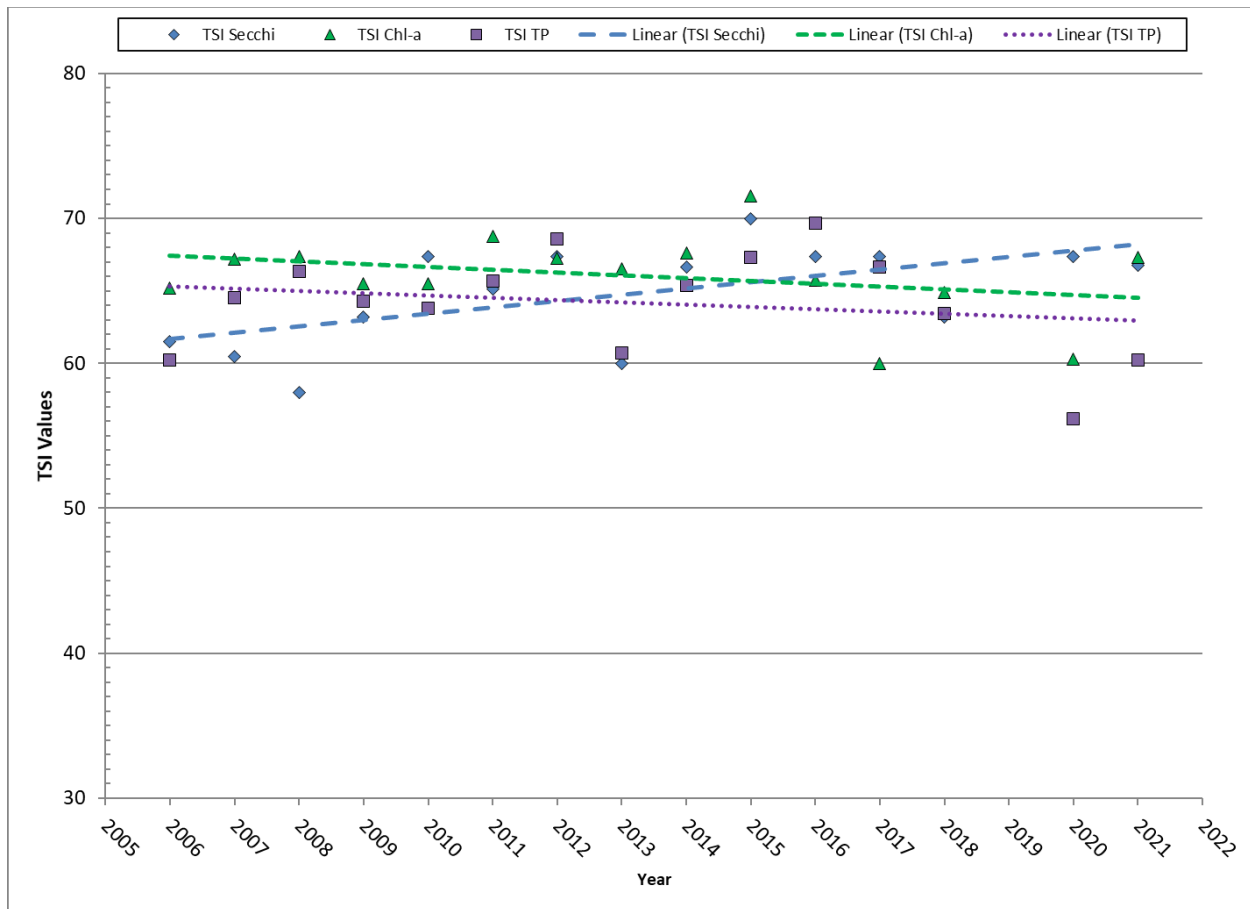


Figure 3-4. Annual Median TSI Values.

Table 3-3. Implications of TSI Values on Lake Attributes.

TSI Value	Attributes	Primary Contact Recreation	Aquatic Life (Fisheries)
50-60	eutrophy: anoxic hypolimnia; macrophyte problems possible	[none]	Warm water fisheries only; percid fishery <sup>(1)</sup> ; bass may be dominant
60-70	blue green algae dominate; algal scums and macrophyte problems occur	weeds, algal scums, and low transparency discourage swimming and boating	Centrarcid fishery <sup>(2)</sup>
70-80	hyper-eutrophy (light limited). Dense algae and macrophytes	weeds, algal scums, and low transparency discourage swimming and boating	Cyprinid fishery (e.g., common carp and other rough fish)
>80	algal scums; few macrophytes	algal scums, and low transparency discourage swimming and boating	rough fish dominate; summer fish kills possible

(1) Fish commonly found in percid fisheries include walleye and some species of perch

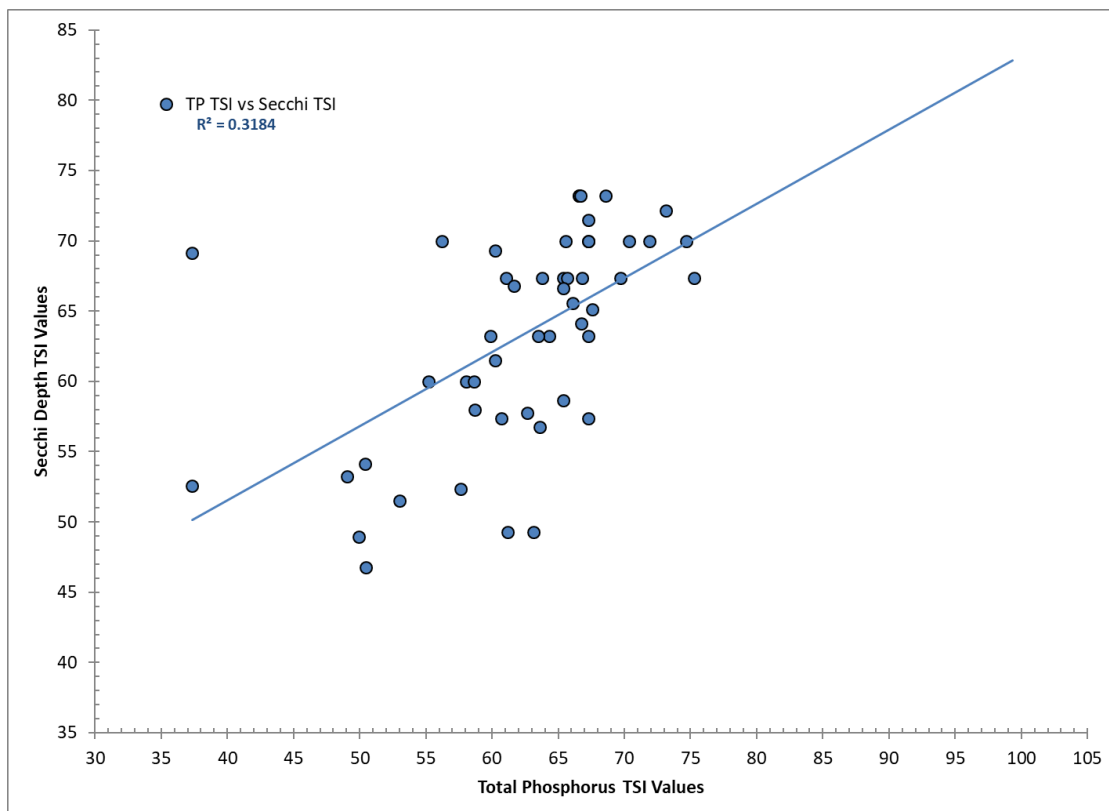
(2) Fish commonly found in centrarcid fisheries include crappie, bluegill, and bass

Note: Modified from Carlson and Simpson (1996).

Subsequent analyses show the link between the three indices of in-lake water quality. Figure 3-5 shows the relationship between Secchi depth and total phosphorus (TP) TSI values. Figure 3-6 shows the relationship between chl-a and TP TSI values. Figure 3-7 shows the relationship between Secchi depth and chl-a TSI values. The R<sup>2</sup> values between the various TSI indices are summarized in Table 3-4. There is a positive correlation between all TSI indices with the relationship between TP and chl-a being the strongest. This suggests that transparency issues can be linked to algal blooms. It also suggests that targeting phosphorus reductions in the watershed should reduce algal blooms, which in turn will improve transparency.

**Table 3-4. Total Phosphorus, Chl-a, Secchi depth, and Total Nitrogen Relationships and R<sup>2</sup> Values.**

TSI indicator	Total Phosphorus	Chlorophyll-a	Total Nitrogen
Total Phosphorus	---	0.328	0.236
Chlorophyll-a	0.328	---	0.198
Secchi depth	0.318	0.179	0.168



**Figure 3-5. Analysis Period TSI Values for Total Phosphorus and Secchi Depth.**

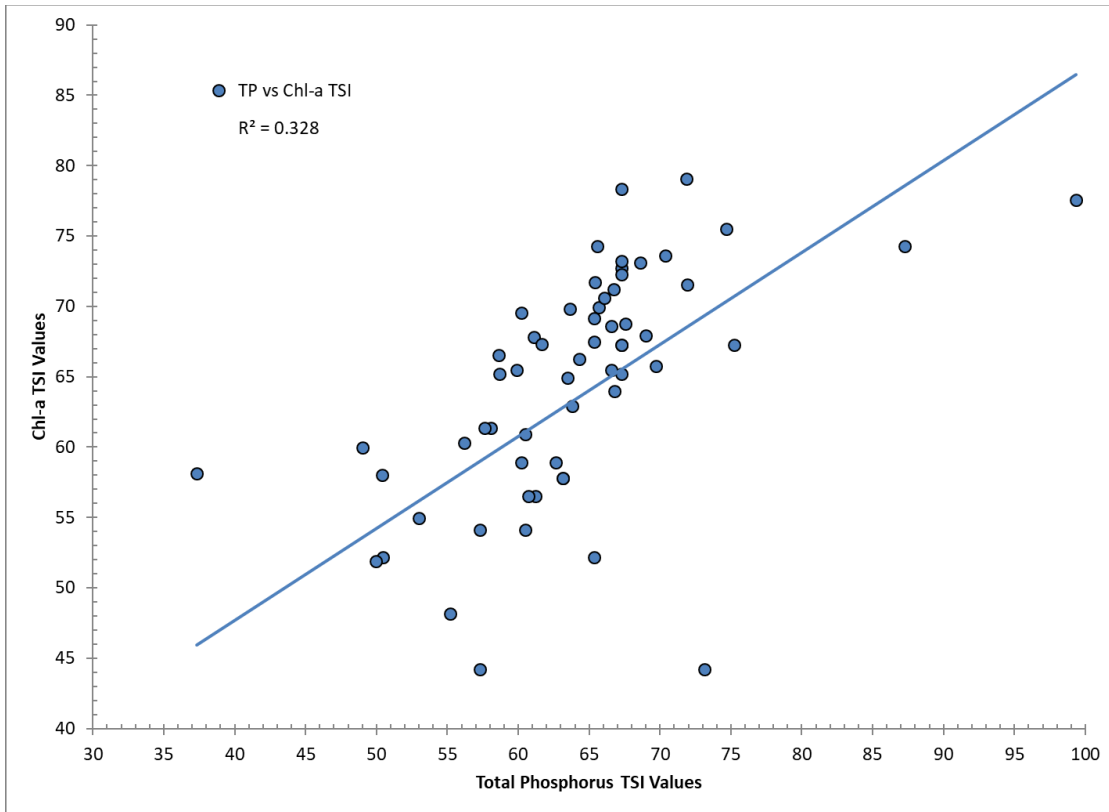


Figure 3-6. Analysis Period TSI Values for Total Phosphorus and Chlorophyll-A.

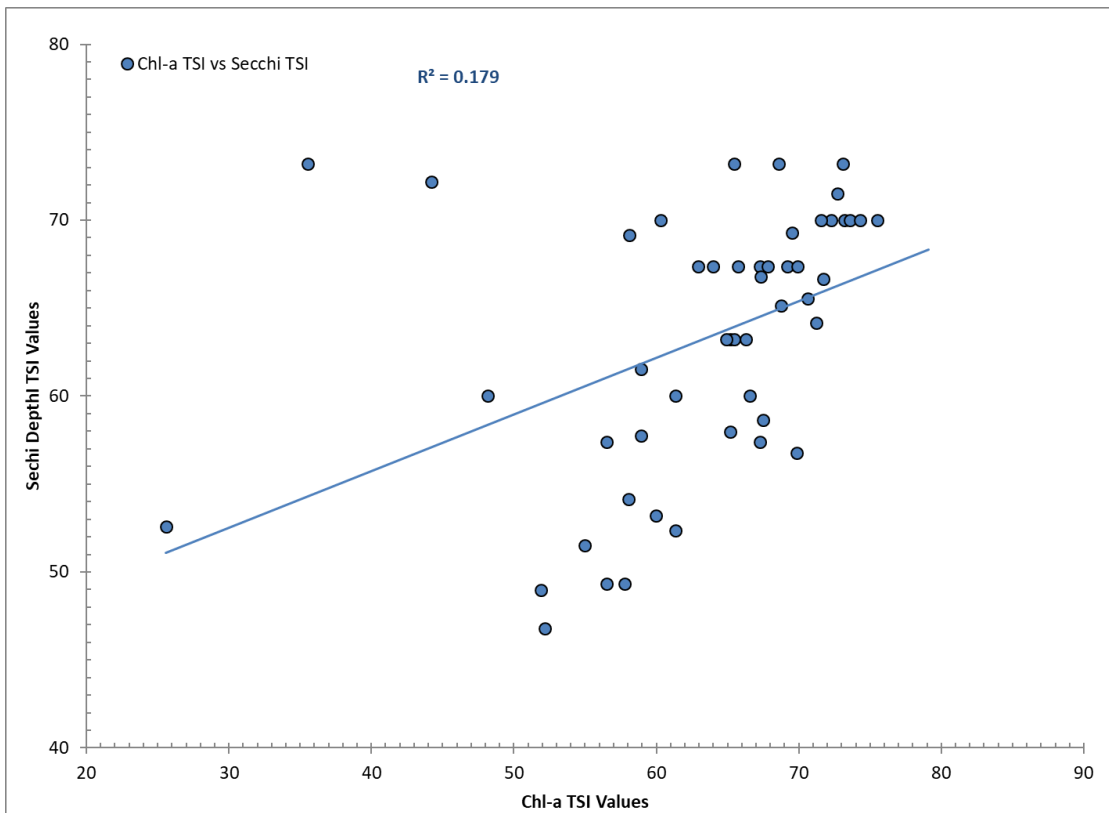


Figure 3-7. Analysis Period TSI Values for Chlorophyll-A and Secchi Depth.

Figure 3-8 and Figure 3-9 illustrates a method for interpreting the meaning of the deviations between Carlson’s TSI values for TP, Secchi depth, and chl-a. Each quadrant of the chart indicates the potential factors that may limit algal growth in a lake. A detailed description of this approach is available in A Coordinator’s Guide to Volunteer Lake Monitoring Methods (Carlson and Simpson, 1996). If the deviation between the chl-a TSI and TP TSI is less than zero (Chl TSI < TP TSI), the data point will fall below the X-axis. This suggests phosphorus may not be the limiting factor in algal growth. The X-axis, or zero line, is related to TN:TP ratios of greater than 33:1 (Carlson, 1977). Because phosphorus is thought to become limiting at ratios greater than 10:1, TP deviations slightly below the X-axis do not necessarily indicate nitrogen limitation.

Points to the left of the Y-axis (Chl TSI < SD TSI) represent conditions in which transparency is reduced by non-algal turbidity. Points to the right reflect situations in which transparency is greater than chl-a levels would suggest, meaning that large particles, rather than fine clay particles, influence water clarity. Deviations to the right may also be caused by high zooplankton populations that feed on algae, keeping the algal populations lower than expected given other conditions.

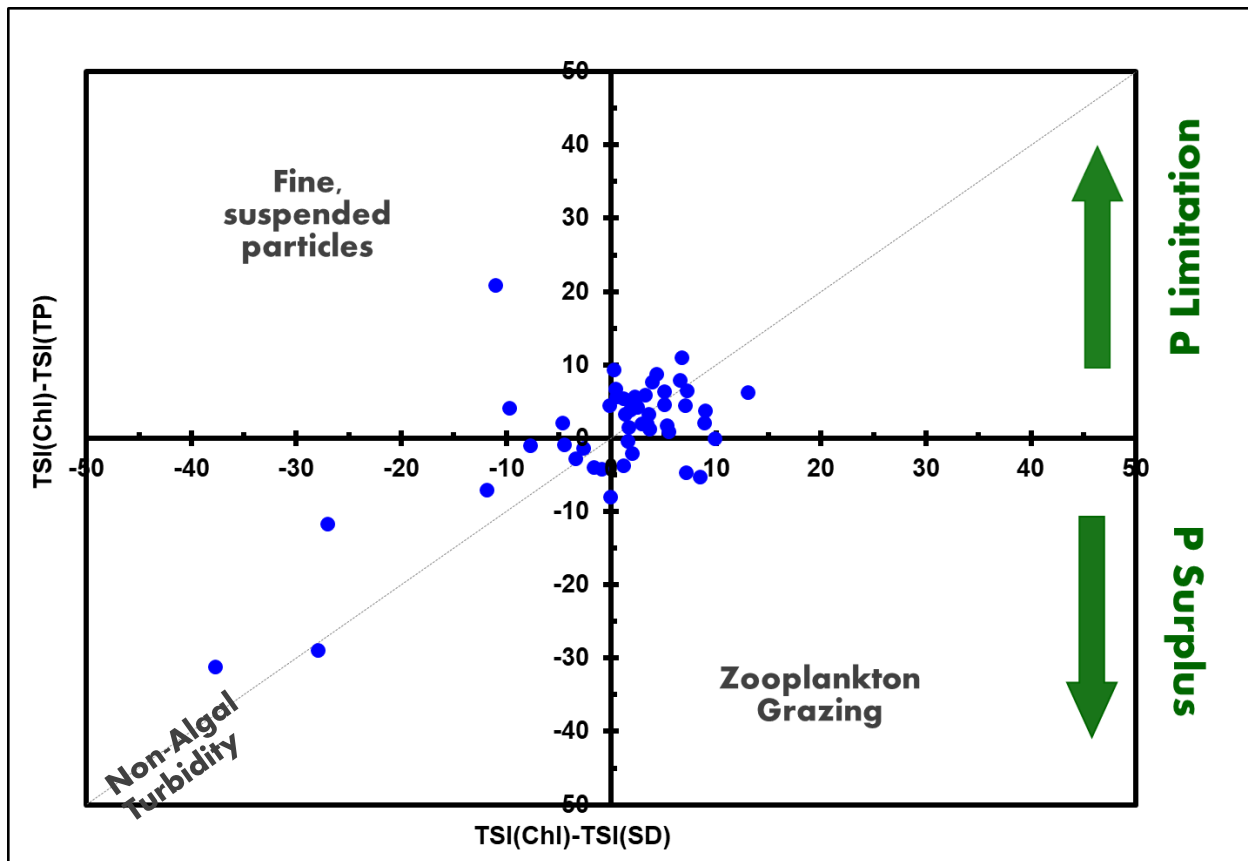


Figure 3-8. Phosphorus TSI Deviations Grab Samples for Analysis Period.

Chl-a and TP TSI deviations are split between positive and negative deviations with 66 percent (33 of 50) above the x-axis and 34 percent (17 of 50) below the x-axis as shown in Figure 3-8. The highest percentages of deviations are located in the upper right-hand quadrant (29 of 50 samples, 58%). The second highest percentage of deviations are located in the bottom left hand quadrant (11 of 50, 22%).

The remaining samples are distributed with only a small percentage located in the upper left hand (4 of 50, 8%) and lower right hand (6 of 50, 12%) quadrants. Samples located in the upper right-hand quadrant would indicate large particles dominate and that phosphorus limits the growth of algae. Samples in the lower left-hand quadrant would indicate smaller particles dominate and something other than phosphorus limits the algae growth. Samples in the lower right-hand quadrant suggest transparency is limited by large particles, with a surplus of phosphorus, and possible limited algae growth due to zooplankton grazing.

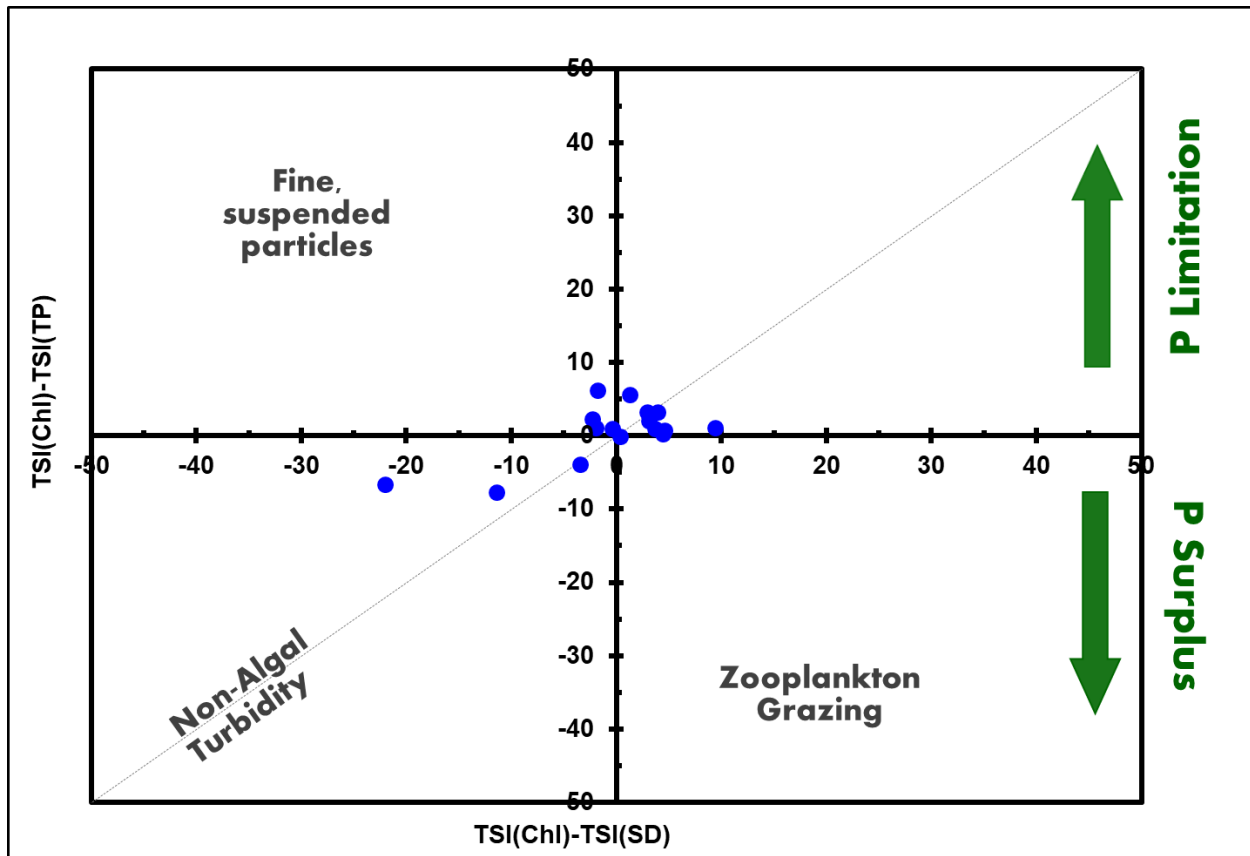


Figure 3-9. Phosphorus TSI Deviations Annual Averages for Analysis Period.

Chl-a, Secchi depth, and TP TSI values do not show any correlation or a very weak correlation to annual or growing season precipitation as shown (Figure 3-10 through Figure 3-12.).

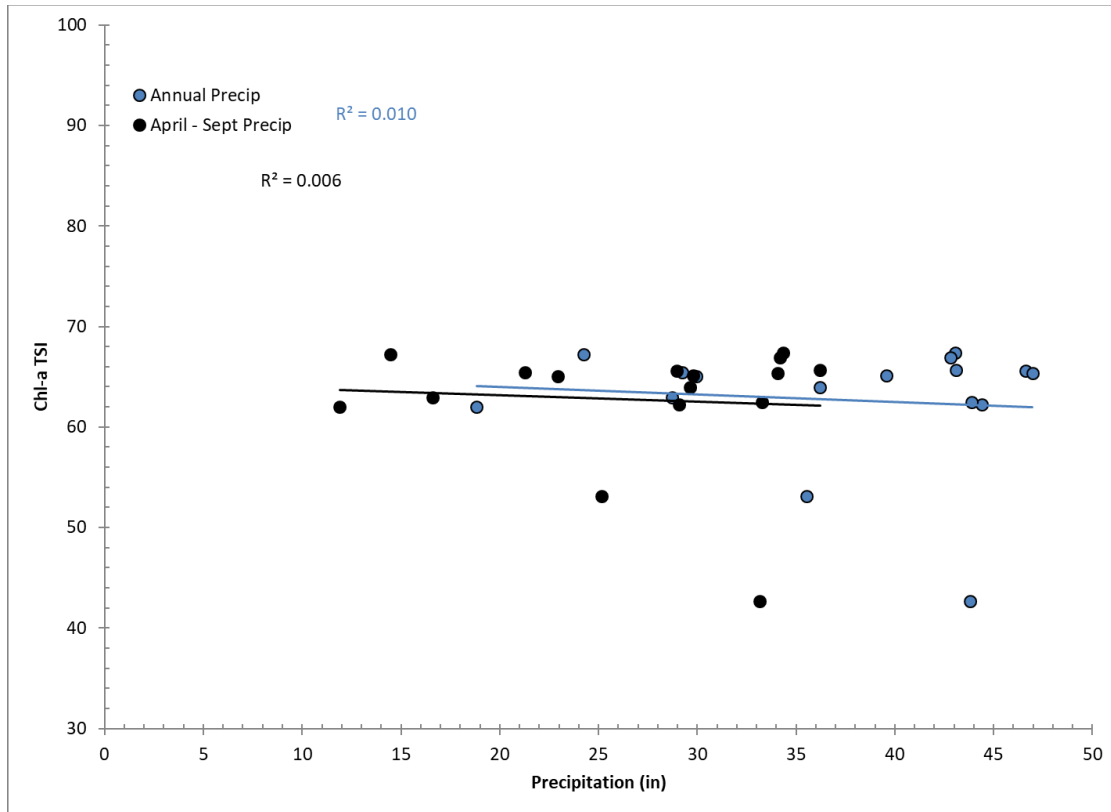


Figure 3-10. Chl-a TSI Values vs Annual and Growing Season Precipitation.

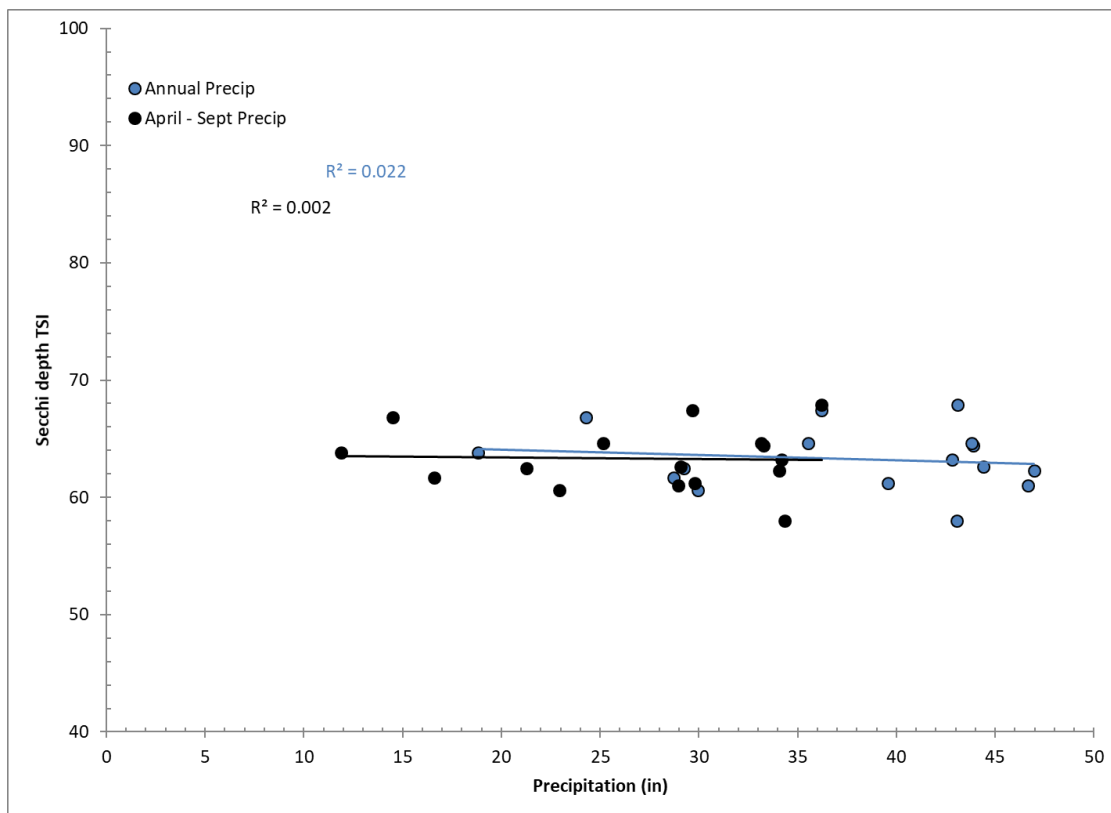


Figure 3-11. Secchi Depth TSI Values vs Annual and Growing Season Precipitation.

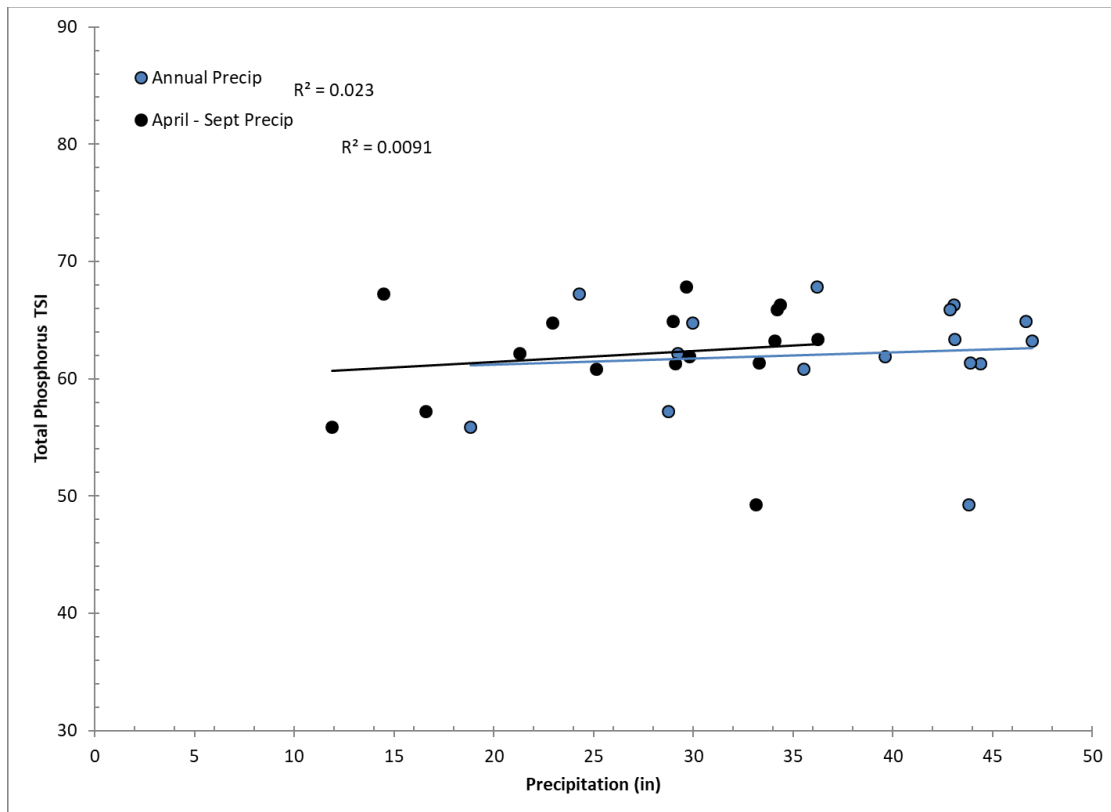


Figure 3-12. Total Phosphorus TSI Values vs Annual and Growing Season Precipitation.

Within lakes, the main two nutrients necessary for algal bloom development are nitrogen and phosphorus. When one nutrient is in short supply relative to the other, this nutrient supply will be exhausted first during growth. Once this nutrient is no longer available, growth is limited. Generally, in Iowa lakes, phosphorus is the limiting nutrient. Ratios of nitrogen to phosphorus can provide clues as to which nutrient is limiting growth in a given waterbody.

The overall TN:TP ratio in water quality samples from Lake Anita, using average grab sample concentrations from the analysis period is 21.0. According to a study on blue-green algae dominance in lakes, ratios greater than 17 suggest a lake is phosphorus, rather than nitrogen, limited (MPCA, 2005). Carlson states that phosphorus may be a limiting factor at TN:TP ratios greater than 10 (Carlson and Simpson, 1996). Ratios that fall between 10 to 17 are often considered “co-limiting,” meaning either nitrogen or phosphorus is the limiting nutrient or light is limited due to high non-algal turbidity.

Table 3-5 lists number of samples for each nutrient limiting condition for all samples, when TSI(chl-a) is greater than 65, and when TSI(SD) is greater than 65. Analysis of the TN:TP ratio in Lake Anita samples reveals that the lake is P-limited 55 percent of the time and co-limited 33 percent of the time. In addition, when the chl-a TSI exceeds 65, the lake is either P-limited or co-limited 82 percent of the time. When the Secchi depth TSI exceeds 65, the lake is either P-limited or co-limited 87 percent of the time. This analysis reveals that water quality improvement of algal blooms and turbidity via TP reduction is most feasible. If phosphorus reductions are not accompanied by reductions in algal blooms, then reductions in nitrogen may prove necessary to reduce algae to an acceptable level.

**Table 3-5. TN:TP Ratio Summary in Lake Anita.**

Samples Collected	# of Samples	N-Limited (<10)	Co-Limited (10-17)	P-Limited (>17)
All Samples	55	7 (12%)	18 (33%)	30 (55%)
Samples with Chl-a TSI > 65	29	5 (17%)	10 (34%)	14 (48%)
Samples with Secchi TSI >65	24	3 (13%)	8 (33%)	13 (54%)

### 3.2. TMDL Target

#### *General Description of the Pollutant*

The 2022 305(b) assessment attributes poor water quality in Lake Anita to excess algae and the data interpretation described in Section 3.1 indicates phosphorus load reduction will best address the impairment. It will be important to continue to assess TSI values for chl-a and Secchi depth as phosphorus reduction practices are implemented. If phosphorus reductions are not accompanied by reductions in algal blooms and turbidity levels, then reductions of nitrogen may prove necessary to reduce algae to an acceptable level. However, phosphorus should be reduced first, as it is the primary limiting nutrient in algal growth. Additionally, reductions in nitrogen that result in nitrogen limitation favor growth of harmful cyanobacteria, which have the ability to fix nitrogen from the atmosphere. These bacteria, often referred to as blue-green algae, can emit cyanotoxins to the water, which can harm humans, pets, and wildlife if ingested.

Table 3-6 reports the simulated chl-a, TP, and Secchi depth at the ambient monitoring location for both existing and target conditions. In-lake water quality was simulated using the BATHTUB model, which is described in more detail in Appendix E. The Secchi depth TSI target of 63 complies with the narrative “free from aesthetically objectionable conditions” criterion. Meeting this target will result in delisting Lake Anita if attained in two consecutive 303(d) listing cycles. Note that TP values in Table 3-6 are not TMDL targets. Rather, they represent in-lake water quality resulting from TP load reductions required to obtain the chl-a and Secchi depth TSI targets in Lake Anita.

It is worth noting here that the critical TSI value of 63 in the modeling was for Secchi depth. This could indicate that clarity issues within the lake are the result of something other than algae. Which seems to be consistent with the data plotted in Figure 3-8 since the data points are in close proximity to the non-algae turbidity line.

**Table 3-6. Existing and Target Water Quality (Ambient Monitoring Location).**

Parameter	2006-2021 <sup>(1)</sup>	2016-2020 <sup>(2)</sup>	TMDL Target Conditions
Secchi Depth (meter)	0.69	0.6	0.8
TSI (Secchi Depth)	65	67	63
Chlorophyll-a (µg/L)	35.0	20.6	27.1
TSI (Chlorophyll-a)	65	60	63
TP (µg/L)	64.0	52	44.6
TSI (TP)	64	61	59

(1) Modeled Period, Median Values.

(2) 2022 Assessment/Listing Cycle Values.



### *Selection of Environmental Conditions*

The critical period for poor water clarity is the growing season (April through September). However, long-term phosphorus loads lead to buildup of phosphorus in the reservoir and can contribute to algal growth and turbidity regardless of when phosphorus first enters the lake. Therefore, both existing and allowable TP loads to Lake Anita are expressed as annual averages. Phosphorus loads are also expressed as daily maximums to comply with EPA guidance.

### *Waterbody Pollutant Loading Capacity (TMDL)*

This TMDL establishes a chl-a TSI target of 63 and a Secchi depth TSI target of 63 or less using analyses of existing water quality data and Carlson's trophic state index methodology. The allowable TP loading capacity was developed by performing water quality simulations using the BATHTUB model. BATHTUB is a steady-state water quality model that performs empirical eutrophication simulations in lakes and reservoirs (Walker, 1999). The BATHTUB model was calibrated to available water quality data collected by ISU from 2006-2021.

The BATHTUB model is driven by weather, lake morphometry (i.e., size and shape), watershed hydrology, and sediment and nutrient loads predicted by the STEPL model. STEPL utilizes simple equations to predict sediment and nutrient loads from various land use and animal sources, and includes a tool that estimates potential sediment and nutrient reductions resulting from implementation of Best Management Practices (BMPs). STEPL input included local soil, land use, and climate data. A detailed discussion of the parameterization and calibration of the STEPL and BATHTUB models is provided in Appendices D through F.

The annual TP loading capacity was obtained by adjusting the TP loads (tributary concentrations) in the calibrated BATHTUB model until chl-a and Secchi depth TSIs no greater than 63 were attained for the lake segment in which ambient monitoring data is collected. This model will be used to quantify maximum daily loads, while acknowledging that multiple solutions exist. Modeling reductions in external loading shows the annual loading capacity of Lake Anita is 1,225.1 lbs/yr.

In November of 2006, The U.S. Environmental Protection Agency (EPA) issued a memorandum entitled *Establishing TMDL "Daily" Loads in Light of the Decision by the U.S. Court of Appeals for the D.C. circuit in Friends of the Earth, Inc. v. EPA, et al., No. 05-5015, (April 25, 2006) and Implications for NPDES Permits*. In the context of the memorandum, EPA

*"...recommends that all TMDLs and associated load allocations and wasteload allocations include a daily time increment. In addition, TMDL submissions may include alternative, non-daily pollutant load expressions in order to facilitate implementation of the applicable water quality standards..."*

As recommended by EPA, the loading capacity of Lake Anita for TP is expressed as a daily maximum load, in addition to the annual loading capacity of 1,225.1 lbs/year. The annual average load is applicable to the assessment of in-lake water quality and water quality improvement actions, while the daily maximum load satisfies EPA's recommendation for expressing the loading capacity as a daily load.

The maximum daily load was estimated from the growing season average load using a statistical approach that is outlined in more detail in Appendix G. This approach uses a log-normal distribution to calculate the daily maximum from the long-term (e.g., annual) average load. The methodology for this approach is taken directly from a follow-up guidance document entitled *Options for Expressing Daily*

*Loads in TMDLs* (EPA, 2007), and was issued shortly after the November 2006 memorandum cited previously. This methodology can also be found in EPA's 1991 *Technical Support Document for Water Quality Based Toxics Control*. Using the approach, the annual loading capacity of 1,225.1 lbs/yr is equivalent to an average daily load of 3.1 pounds per day (lbs/day) and a maximum daily load of 10.5 lbs/day.

#### *Decision Criteria for WQS Attainment*

The narrative criteria in the water quality standards require that Lake Anita support primary contact for recreation. The metrics for WQS attainment for de-listing the impairments are a chl-a TSI and Secchi depth TSI of 63 or less in two consecutive 303(d) listing cycles.

#### *Compliance Point for WQS Attainment*

The TSI target for listing and delisting of Lake Anita is measured at the ambient monitoring location shown in Figure 3-1. For modeling purposes, the lake was divided into four segments. To maintain consistency with other Clean Water Act programs implemented by the Iowa DNR, such as the 305(b) assessment and 303(d) listing process, the TMDL target is based on water quality of Segment 1, which best represents the ambient monitoring location in Lake Anita.

### **3.3. Pollution Source Assessment**

#### *Existing Load*

Average annual simulations of hydrology and pollutant loading were developed using the STEPL model (Version 4.1). STEPL was developed by Tetra Tech, for the US EPA Office of Wetlands, Oceans, and Watersheds (OWOW), and has been utilized extensively in the United States for TMDL development and watershed planning. Model description and parameterization are described in detail in Appendix D.

Using STEPL and BATHTUB to simulate annual average conditions between 2006-2021, the annual TP load to Lake Anita was estimated to be 2,580.1 lbs/yr.

#### *Departure from Load Capacity*

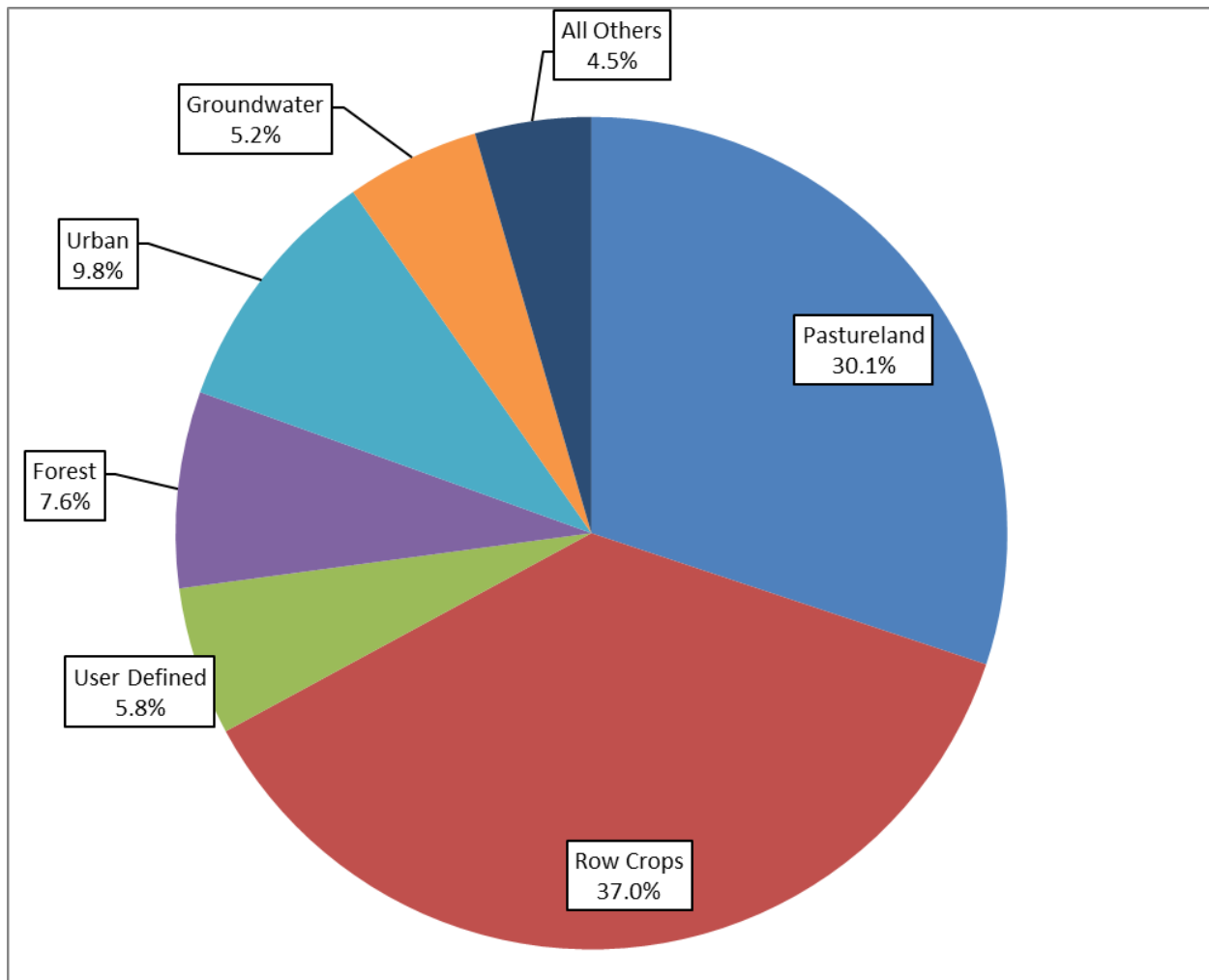
The TP loading capacity for Lake Anita is 1,225.1 lbs/yr and 10.5 lbs/day (maximum daily load). To meet the target loads, an overall reduction of approximately 53 percent of the TP load is required. The implementation plan included in Section 4 describes potential BMPs, potential TP reductions, and considerations for targeted selection and location of BMPs.

#### *Identification of Pollutant Sources*

The existing TP load to Lake Anita is entirely from nonpoint sources of pollution and natural background sources. Table 3-7 reports estimated annual average TP loads to the lake from all known sources, based on the STEPL simulation of average annual conditions from the analysis period. The predominant sources of phosphorus to Lake Anita include erosion from row crops and pastureland. Row crops comprises 12.3 percent of the watershed and approximately 37 percent of the phosphorus load to the lake while pastureland comprises 42.4 percent of the watershed and approximately 30 percent of the phosphorus load to the lake. (Table 3-7 and Figure 3-13).

**Table 3-7. Average Annual TP Loads from Each Source.**

Source	Descriptions and Assumptions	TP Load (lbs/yr)	Percent (%)
Pastureland	Seasonally Grazed Grassland	777.4	30.1%
Row Crops	Sheet and rill erosion from corn and soybeans dominated agriculture	955.3	37.0%
User Defined	All non-grazed grassland, CRP	149.1	5.8%
Forest	Forested park grounds surrounding lake	196.9	7.6%
Urban	Urban areas, roads, and farmsteads	252.7	9.8%
Groundwater	Agricultural tile discharge, natural groundwater flow	131.9	5.2%
All Others	Wildlife, atmospheric deposition, septics	116.8	4.5%
<b>Total</b>		<b>2,580.1</b>	<b>1.00</b>



**Figure 3-13. Relative TP Loads by Source.**

Internal recycling of phosphorus in the lake was not explicitly simulated or calculated because predicted phosphorus loads to the lake from the watershed were large enough to fully account for observed phosphorus levels in the lake. The BATHTUB model empirically and indirectly accounts for low to moderate levels of internal loading without the addition of an internal loading input to the model. In lakes with substantial internal loading issues, inclusion of additional internal load inputs is sometimes necessary, but that was not the case for Lake Anita. Internal recycling of phosphorus may be important in extremely dry conditions, typically late in the growing season, when the water level falls below the spillway crest creating a stagnant pool in the reservoir. Reduction of internal lake loads is a valid water quality improvement strategy, but watershed loads are more critical to long-term water quality in the lake.

#### *Allowance for Increases in Pollutant Loads*

There is no allowance for increased phosphorus loading included as part of this TMDL. A majority of the watershed is in row crops and pastureland. It is likely that current land uses will remain consistent with only minimal changes in the future. Any future residential or urban development may contribute similar sediment loads and therefore will not increase phosphorus to the lake system. There are currently no incorporated unsewered communities in the watershed therefore, it is unlikely that a future WLA would be needed for a new point source discharge. Any future development of animal feeding operations (AFO) qualifying as large concentrated animal feeding operations (CAFO) or meeting the requirements for NPDES permits as small or medium sized CAFOs will have zero discharge permits.

### **3.4. Pollutant Allocation**

#### *Wasteload Allocation*

There are no permitted point source dischargers of phosphorus in the Lake Anita watershed. The WLA is set to zero (0), and all of the loading capacity is allocated as a gross allotment to the load allocation.

#### *Load Allocation*

The load allocation consists of nonpoint sources and natural background sources. Sources of phosphorus to Lake Anita include erosion from land in pasture and row crop production, erosion from grasslands, erosion from timber/wooded areas, transport from developed areas (roads, residences, etc.), wildlife defecation, failing septic systems, atmospheric deposition (from dust and rain), and groundwater contributions. Without additional site-specific information, it is difficult to separate natural background sources from nonpoint sources. Consequently, the load allocation is presented as a gross allotment.

Changes in agricultural land management, implementation of structural best management practices (BMPs), repair or replacement of failing septic systems, and in-lake restoration techniques can reduce phosphorus loads and improve water quality in Lake Anita. Based on the inventory of sources, management and structural practices targeting surface runoff contributions of phosphorus offer the largest potential reductions in TP loads.

Table 3-8 shows an example of a load allocation scenario for the Lake Anita watershed that meets the overall TMDL phosphorus target. The LA is 1,102.6 lbs/year, with a maximum daily LA of 9.4 lbs/day. The daily maximum LA was obtained by subtracting the daily WLA and daily MOS from the statistically derived TMDL (as described in Section 3.2 and Appendix G). The specific reductions shown in Table 3-8 are not required, but provide one of many possible combinations of reductions that would achieve water quality goals.

**Table 3-8. Example Load Allocation Scheme to Meet Target TP Load.**

TP Source	Existing Load (lbs/year)	LA (lbs/year)	NPS Reduction (%)
Pastureland	777.4	279.9	64
Row Crops	955.3	343.9	64
User Defined <sup>(1)</sup>	149.1	53.7	64
Forest	196.9	70.9	64
Urban	252.7	91.0	64
Groundwater	131.9	131.9	0
All Others <sup>(2)</sup>	116.8	116.7	0
<b>Total</b>	<b>2,580.1</b>	<b>1,088.0</b>	<b>--</b>

(1) Non-grazed grassland and Alfalfa/Hay, CRP, Native Grasses

(2) Atmospheric contributions, direct lake contributions by waterfowl, septics

*Margin of Safety*

To account for uncertainties in data and modeling, a margin of safety (MOS) is a required component of all TMDLs. An explicit MOS of 10 percent (122.5 lbs/year, 1.1 lbs/day) was utilized in the development of this TMDL. These uncertainties may include seasonal changes in nutrient concentrations of influent to Lake Anita, changes in internal recycling that may be seasonal in nature, and maintenance and efficiency of existing BMPs.

*Reasonable Assurance*

Under current EPA guidance, when a TMDL is developed for waters impaired by both point and nonpoint sources, and the WLA is based on an assumption that nonpoint source load reductions will occur, the TMDL should provide reasonable assurance that nonpoint source control measures will achieve expected load reductions. There are no permitted or regulated point source discharges contributing phosphorus to Lake Anita and the WLA is zero, therefore reasonable assurance of point source reductions is not applicable. Reasonable assurance for reduction of nonpoint sources is provided by the list of potential best management practices that would deliver phosphorus reductions, a group of nonstructural practices that prevent transport of phosphorus, a proposed methodology for prioritizing and targeting BMPs on the landscape, and monitoring for best available data for estimating the reductions associated with implemented BMPs.

### 3.5. TMDL Summary

The following general equation represents the total maximum daily load (TMDL) calculation and its components:

$$TMDL = LC = \Sigma WLA + \Sigma LA + MOS$$

Where:

- TMDL = total maximum daily load
- LC = loading capacity
- $\Sigma$  WLA = sum of wasteload allocations (point sources)
- $\Sigma$  LA = sum of load allocations (nonpoint sources)
- MOS = margin of safety (to account for uncertainty)

Once the loading capacity, wasteload allocations, load allocations, and margin of safety have all been determined for the Lake Anita watershed, the general equation above can be expressed for the Lake Anita algae and turbidity TMDL.

Expressed as the allowable annual average, which is helpful for water quality assessment and watershed management:

$$\begin{aligned} \mathbf{TMDL} = LC &= \Sigma WLA (0 \text{ lbs-TP/year}) + \Sigma LA (1,102.6 \text{ lbs-TP/year}) \\ &+ MOS (122.5 \text{ lbs-TP/year}) = \mathbf{1,225.1 \text{ lbs-TP/year}} \end{aligned}$$

Expressed as the maximum daily load:

$$\begin{aligned} \mathbf{TMDL} = LC &= \Sigma WLA (0 \text{ lbs-TP/day}) + \Sigma LA (9.4 \text{ lbs-TP/day}) \\ &+ MOS (1.1 \text{ lbs-TP/day}) = \mathbf{10.5 \text{ lbs-TP/day}} \end{aligned}$$

## 4. Implementation Planning

An implementation plan is not a requirement of the Federal Clean Water Act. However, the Iowa Department of Natural Resources (DNR) recognizes that technical guidance and support are critical to achieving the goals outlined in this Water Quality Improvement Plan (WQIP). Therefore, this implementation plan is included for use by local agencies, watershed managers, and citizens for decision-making support and planning purposes. The best management practices (BMPs) discussed are potential tools that will help achieve water quality goals if appropriately utilized. It is possible that only a portion of BMPs included in this plan will be feasible for implementation in the Lake Anita watershed. Additionally, there may be potential BMPs not discussed in this implementation plan that should be considered. This implementation plan should be used as a guide or foundation for detailed and comprehensive planning by local stakeholders.

Collaboration and action by residents, landowners, lake users, and local agencies will be essential to improve water quality in Lake Anita and support its designated uses. Locally-led efforts have proven to be the most successful in obtaining real and significant water quality improvements. Improved water quality results in economic and recreational benefits for people that live, work, and recreate in the watershed. Therefore, each group has a stake in promoting awareness and educating others about water quality, working together to adopt a comprehensive watershed improvement plan, and applying BMPs and land management changes in the watershed.

### 4.1. Previous Watershed Planning and Implementation

Since the development of Lake Anita in the 1960's, agricultural producers have updated management practices, implemented grassed waterways and conservation tillage practices. These practices help prevent and mitigate soil loss from the landscape, which can in turn decrease nutrient and pollutant loading to the lake system. In addition, sedimentation basins were constructed to aid in the improvement of the water quality of Lake Anita by settling out sediment laden runoff.

### 4.2. Future Planning and Implementation

#### *General Approach*

Watershed management and BMP implementation to reduce algae in the lake should utilize a phased approach to improving water quality. The existing loads, loading targets, a general listing of BMPs needed to improve water quality, and a monitoring plan to assess progress are established in this WQIP. Completion of the WQIP should be followed by the development of a watershed management plan by a local planning group. The watershed plan should include more comprehensive and detailed actions to better guide the implementation of specific BMPs. Tasks required to obtain real and significant water quality improvements include continued monitoring, assessment of water quality trends, assessment of water quality standards (WQS) attainment, and adjustment of proposed BMP types, location, and implementation schedule to account for changing conditions in the watershed.

#### *Timeline*

Planning and implementation of future improvement efforts may take several years, depending on stakeholder interest, availability of funds, landowner participation, and time needed for design and construction of any structural BMPs. Realization and documentation of significant water quality benefits may take 5-10 years or longer, depending on weather patterns, amount of water quality data collected, and the successful selection, location, design, construction, and maintenance of BMPs. Monitoring should continue throughout implementation of BMPs and beyond to document water quality improvement.

### *Tracking Milestones and Progress*

This WQIP, including the proposed monitoring plan outlined in Section 5, would address several of the elements required for a nine-element plan approved by EPA for the use of 319 funds, or other state and federal funding sources, as available. Establishment of specific short, intermediate, and long-term water quality goals and milestones would also be needed for additional funding from available sources. A path to full attainment of water quality standards and designated uses must be included for most funding sources, but efforts should first focus on documenting water quality improvement resulting from BMPs and elimination of any phosphorus “hot spots” that may exist.

### **4.3. Best Management Practices**

No stand-alone BMP will be able to sufficiently reduce phosphorus loads to Lake Anita. Rather, a comprehensive package of BMPs will be required to reduce sediment and phosphorus loads to the lake, which can cause elevated algal growth and turbidity issues. The majority of phosphorus enters the lake via nutrient loss from cropland, non-grazed grassland and forested land through sheet / rill and gully erosion. These sources have distinct phosphorus transport pathways and processes; therefore, each requires a different set of BMPs and strategies.

Other sources, although relatively small on an annualized basis, can have important localized and seasonal effects on water quality. It is important that all sources are considered to reduce phosphorus loads in the most comprehensive manner possible. Experience has shown that watershed projects that involve widespread “ownership” of potential solutions have the best chance of success. At the same time, resources to address the various sources of phosphorus should be allocated in a manner that is reflective of the importance to the impairment: algal blooms and turbidity issues caused primarily by excess phosphorus loads to the lake and in the lake. Potential BMPs are grouped into three types: land management (prevention), structural (mitigation), and in-lake alternatives (remediation).

#### *Land Management (Prevention Strategies)*

Many agricultural BMPs are designed to reduce erosion and nutrient loss from the landscape. These BMPs provide the highest level of soil conservation and soil health benefits because they prevent erosion and nutrient loss from occurring. Land management alternatives implemented in row crop areas should include conservation practices such as no-till and strip-till farming, diversified crop rotation methods, utilization of in-field buffers, and cover crops. Incorporation of fertilizer into the soil by knife injection equipment reduces phosphorus levels as well as nitrogen and bacteria levels in runoff from application areas. Strategic timing of fertilizer application and avoiding over-application may have even greater benefits to water quality. Application of fertilizer on frozen ground should be avoided, as should application when heavy rainfall is forecasted. Land retirement programs such as the conservation reserve program (CRP), and conservation reserve enhancement program (CREP) constructed wetlands may be considered where appropriate. Table 4-1 summarizes land management BMPs and associated phosphorus reduction estimates.



**Table 4-1. Potential Land Management BMPs (Prevention Strategies).**

BMP or Activity	<sup>1</sup> Potential TP Reduction
<b>Conservation Tillage:</b>	
Moderate vs. Intensive Tillage	50%
No-Till vs. Intensive Tillage	70%
No-Till vs. Moderate Tillage	45%
Cover Crops	50%
Diversified Cropping Systems	50%
In-Field Vegetative Buffers	50%
<b>Pasture/Grassland Management:</b>	
Livestock Exclusion from Streams	75%
Rotational Grazing vs. Constant Intensive Grazing	25%
Seasonal Grazing vs. Constant Intensive Grazing	50%
<b>Phosphorus Nutrient Application Techniques:</b>	
<sup>2</sup> Deep Tillage Incorporation vs. Surface Broadcast	-15%
<sup>2</sup> Shallow Tillage Incorporation vs. Surface Broadcast	-10%
Knife/Injection Incorporation vs. Surface Broadcast	35%
<b>Phosphorus Nutrient Application Timing and Rates:</b>	
Spring vs. Fall Application	30%
Soil-Test P Rate vs. Over-Application Rates	40%
Application: 1-month prior to runoff event vs. 1-day	30%

(1) Adopted from Dinnes (2004). Actual reduction percentages may vary widely across sites and runoff events.

(2) Note: Tillage incorporation can increase TP in runoff in some cases.

*Structural BMPs (Mitigation Strategies)*

Although they do not address the underlying generation of sediment or nutrients, structural BMPs such as sediment control basins, terraces, grass waterways, saturated buffers, riparian buffers, and wetlands can play a valuable role in reduction of sediment and nutrient transport to Lake Anita. These BMPs attempt to mitigate the impacts of soil erosion and nutrient loss by intercepting them before they reach a stream or lake. Structural BMPs should be targeted to “priority areas” to increase their cost effectiveness and maximize pollutant reductions. Landowner willingness and the physical features of potential sites must also be considered when targeting structural practices. These practices may offer additional benefits not directly related to water quality improvement. These secondary benefits are important to emphasize to increase landowner and public interest and adoption. Potential structural BMPs are listed in Table 4-2, which includes secondary benefits and potential TP reductions.

**Table 4-2. Potential Structural BMPs (Mitigation Strategies).**

BMP or Activity	Secondary Benefits	<sup>1</sup> Potential TP Reduction
Terraces	Soil conservation, prevent in-field gullies, prevent wash-outs	50%
Grass Waterways	Prevent in-field gullies, prevent washouts, some ecological services	50%
<sup>2</sup> Sediment Control Structures	Some ecological services, gully prevention	Varies
<sup>3</sup> Wetlands	Ecological services, potential flood mitigation, aesthetic value	15%
Riparian Buffers	Ecological services, aesthetic value, alternative agriculture	45%
Saturated Buffers	Nitrate removal	<sup>4</sup> Varies

- (1) Adopted from Dinnes (2004). Actual reduction percentages may vary widely across sites and runoff events.
- (2) Not discussed in Dinnes (2004). Phosphorus removal in sediment basins varies widely and is dependent upon the size of the structure relative to the drainage area, the length: width ratio, and drawdown time of a specified rainfall/runoff event.
- (3) Note: TP reductions in wetlands vary greatly depending on site-specific conditions, such as those listed for sediment control structures. Generally, removal of phosphorus is lower in wetlands than in sediment control structures. Wetland can sometimes be sources, rather than sinks, of phosphorus
- (4) Limited research in total phosphorus reduction values

Landowner buy-in, ease of construction, and difficulty implementing preventative land management measures all contribute to the popularity of sediment control structures as a sediment and phosphorus mitigation strategy. However, if not properly designed and constructed, sediment control basins may trap substantially less sediment and phosphorus than widely-used rules-of-thumb that are often assumed when quantifying reductions in the context of a watershed management plan.

To obtain reductions in TP load necessary to meet water quality targets, land management strategies and structural BMPs should be implemented to obtain the largest and most cost-effective water quality benefit. Targeting efforts should consider areas with the highest potential phosphorus loads to the lake. Factors affecting phosphorus contribution include: land cover, steep slopes; proximity to waterbodies; tillage practices and method, timing, and amount of manure and commercial fertilizer application.

The Spreadsheet Tool for Estimating Pollutant Load (STEPL) model was used in TMDL development to predict phosphorus loads to Lake Anita. Figure 4-1 shows the annual phosphorus export from each subbasin in the Lake Anita watershed STEPL model. Phosphorus export rates range from 401 to 928.5 lbs/year. The darker shaded basins indicate the heaviest phosphorus export rates and the lighter shaded basins indicate the lowest export rates relative to the subbasins in this study.

Figure 4-2 shows the annual phosphorus export rate per acre of subbasin. Export rates range from 0.77 to 1.37 lbs/acre-year. The darker shaded basins indicate the heaviest phosphorus export rates and the lighter shaded basins indicate the lowest export rates relative to the subbasins in this study.

More detailed information should be collected in order to target specific BMPs to specific areas (e.g., singular fields or waterways) within a subwatershed. This level of detailed targeting is best accomplished by local officials working collaboratively with local stakeholders and land owners.

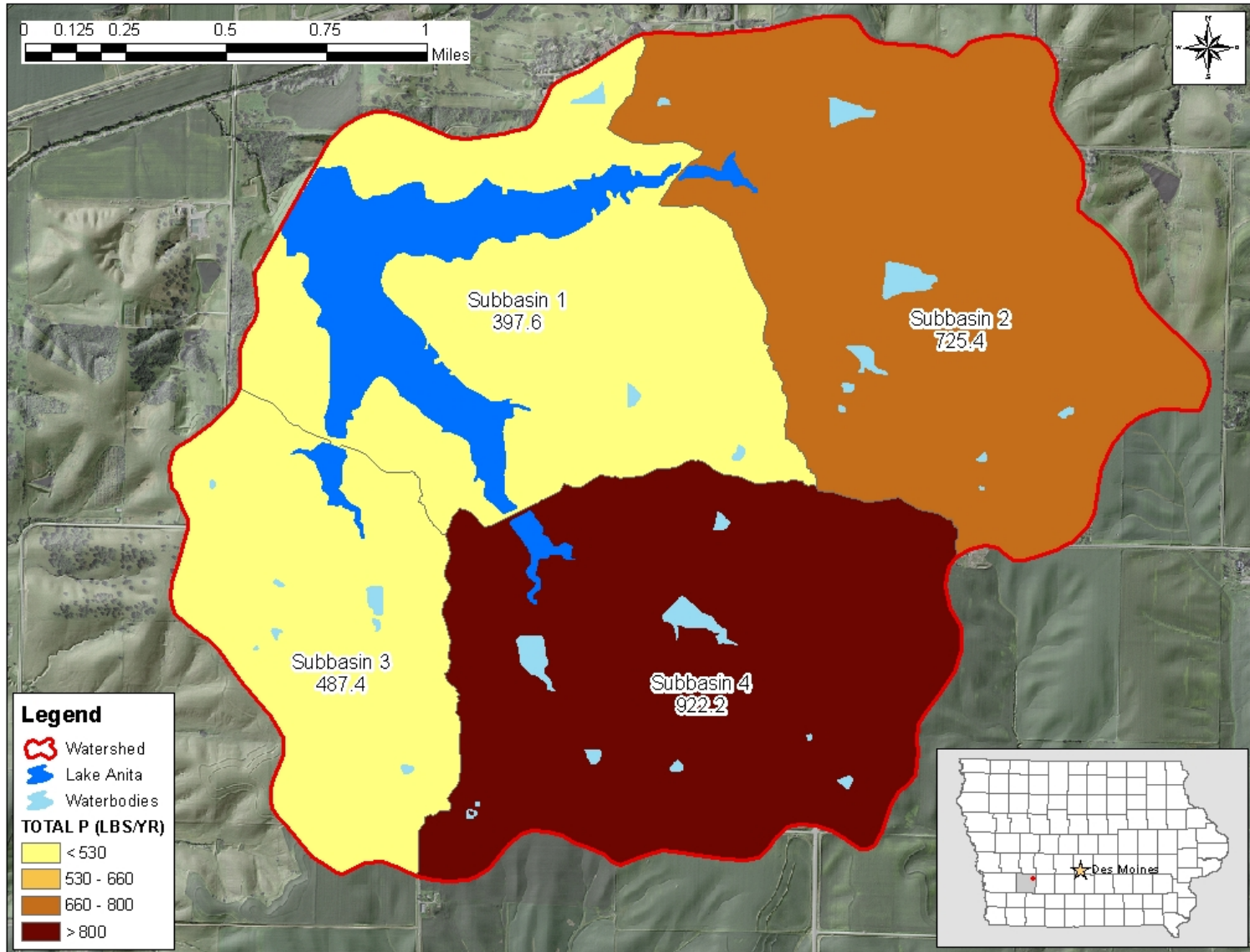


Figure 4-1. Predicted TP Load from each STEPL Subwatershed.

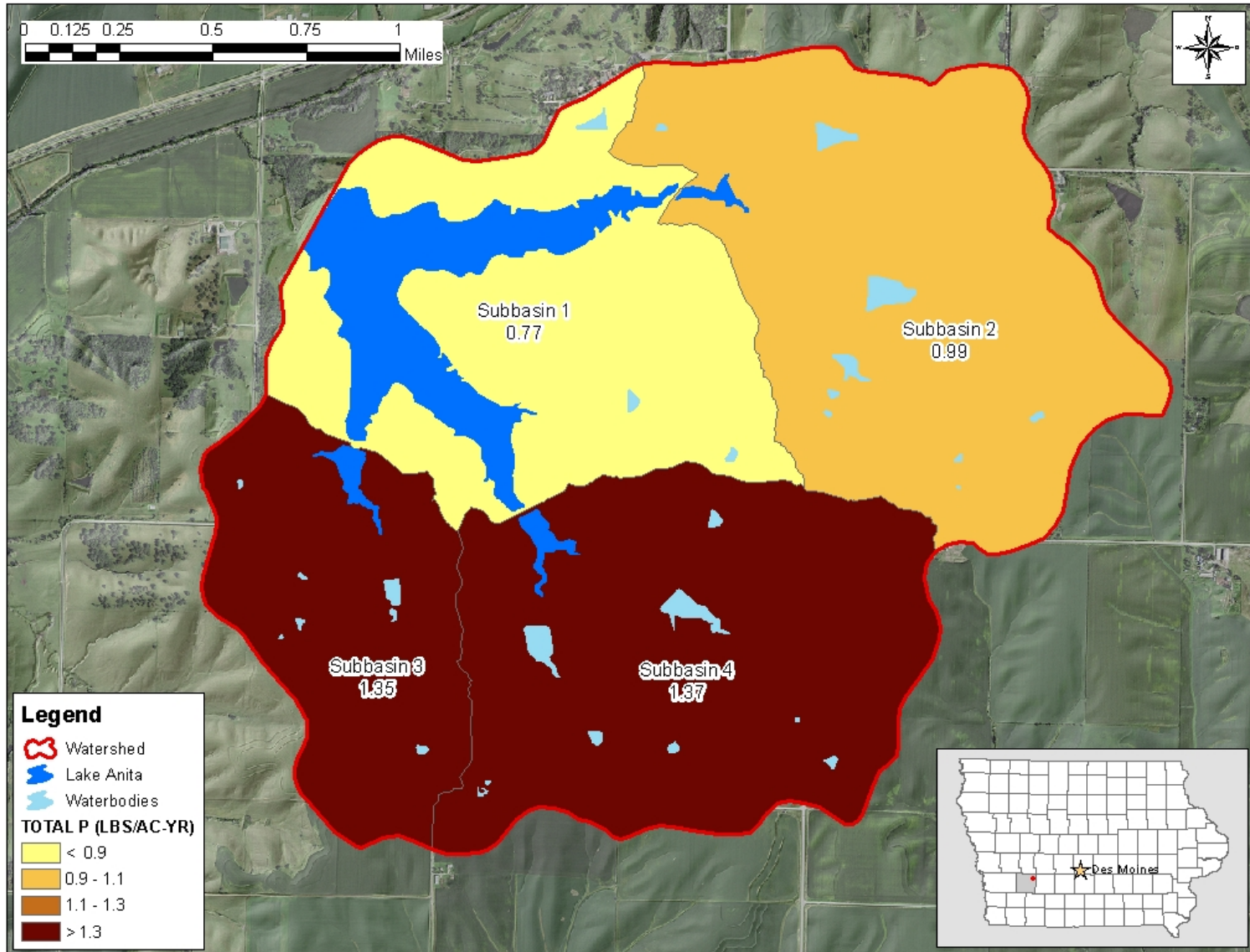


Figure 4-2. Predicted per-Acre TP Export for each STEPL Subwatershed.

***In-Lake BMPs (Remediation Strategies)***

Phosphorus recycled between the bottom sediment and water column of the lake has the potential to be a contributor of bioavailable phosphorus to lakes. The average annual contribution of TP to the system from internal loading appears to be relatively small in Lake Anita. The reservoir has a moderate watershed-to-lake ratio (14.7:1), so external inputs are typically greater than internal recycling. However, internal loading may influence in-lake water under certain conditions despite its relatively insignificant average annual phosphorus contribution. Internal loads may exacerbate algal blooms in late summer periods, especially if lake outflow ceases and water temperatures exceed normal levels. It is important to understand that external phosphorus loads from wet weather supply the build-up of phosphorus in the bottom sediments. Estimates of external loads from the Lake Anita watershed are of large enough magnitude to fully account for observed in-lake phosphorus and subsequent algae levels. Even in lakes with high suspected internal loads, uncertainty regarding the magnitude of internal loads is one of the biggest challenges to TMDL development and lake restoration. Because of these factors, reductions from watershed sources of TP should be given implementation priority. If and when monitoring shows that the external watershed load has been adequately reduced, then additional in-lake measures may be warranted.

Brief descriptions of potential in-lake restoration methods are included in Table 4-3. Phosphorus reduction impacts of each alternative will vary and depend on a number of site-specific factors. It is difficult to determine how much of the internal load is due to each of the contributing factors, and equally difficult to predict phosphorus reductions associated with individual improvement strategies. In-lake measures should be a part of a comprehensive watershed management plan that includes watershed practices in order to enhance, prolong, and protect the effectiveness of in-lake investments.

**Table 4-3. Potential in-lake BMPs for Water Quality Improvement.**

<b>In-Lake BMPs</b>	<b>Comments</b>
Fisheries management	Low to moderate reductions in internal phosphorus load may be attained via continued fisheries management. The reduction of in-lake phosphorus as a result of this practice is variable, but the overall health of the aquatic ecosystem may be improved, which typically improves overall water quality as well.
Targeted dredging and in-lake silt dike	Strategic dredging or installation of in-lake sediment basins could increase the sediment capacity/reduce sediment and nutrient resuspension thereby reducing sediment and phosphorus loads to the main body where ambient conditions are monitored.
Shoreline reshaping and stabilization	Helps establish and sustain aquatic vegetation, which provides local erosion protection and competes with algae for nutrients. Impacts of individual projects may be small, but cumulative effects of widespread stabilization projects and restoration of previously stabilized areas can help improve water quality. Deepening of near shore areas may help reduce sediment resuspension.
Phosphorus stabilization	Adding compounds, such as alum, to the water column can help stabilize phosphorus that may be resuspended from the lake bottom. This additive precipitates a layer of floc that removes phosphorus as it settles to the lake bottom, and can combine with phosphorus as it is released from sediment

### *Holistic Approach*

An example of a holistic implementation plan would involve prevention, mitigation, and remediation practices across the Lake Anita watershed. These may include any of the practices from Table 4-3 at any scale. Extending grass waterways in conjunction with renovation of existing terraces and contour buffers in corn and soybean ground will help mitigate soil loss from row crop ground. Further adoption of agricultural prevention measures like those listed in Table 4-1 will retain topsoil in the soil profile of the fields and prevent erosion. Potential in-lake strategies such as phosphorus stabilization treatments in Lake Anita are included as well.

### *Observations*

Between 1967 and 2005 five dams and associated ponds were constructed in the watershed as shown in Figure 2-1. Based on the available information, the year the dam was completed is included next to the dam symbol. With typical design life for a reservoir or sedimentation basin of 35 to 50 years four of the five basins have exceeded their design life.

As a starting point the degree of sedimentation could be determined for each basin owned by the DNR or other governmental agencies. If it is determined that these facilities have a large degree of sedimentation, consideration could be given to rehabilitating them. For basins not located on Iowa DNR property it may be necessary to obtain additional easements for rehabilitation work.

## 5. Future Monitoring

Water quality monitoring is critical for assessing the current status of water resources as well as historical and future trends. Furthermore, monitoring is necessary to track the effectiveness of best management practice (BMP) implementation and to document attainment of Total Maximum Daily Loads (TMDLs) and progress towards water quality standards (WQS).

Future monitoring in the Lake Anita watershed can be agency-led, volunteer-based, or a combination of both. For those interested in participating in a volunteer based water quality monitoring program more information can be found at the program website: <http://www.iowadnr.gov/Environmental-Protection/Water-Quality/Water-Monitoring/Volunteer-Water-Monitoring>.

Volunteer-based monitoring efforts should include an approved water quality monitoring plan, called a Quality Assurance Project Plan (QAPP), in accordance with Iowa Administrative Code (IAC) 567-61.10(455B) through 567-61.13(455B). The IAC can be viewed here: <https://www.legis.iowa.gov/docs/iac/chapter/01-18-2017.567.61.pdf>

Failure to prepare an approved QAPP will prevent data collected from being used to evaluate waterbody in the 305(b) Integrated Report – the biannual assessment of water quality in the state, and the 303(d) list – the list that identifies impaired waterbodies.

### 5.1. Routine Monitoring for Water Quality Assessment

Data collection in Lake Anita to assess water quality trends and compliance with water quality standards (WQS) will include monitoring conducted as part of the DNR Ambient Lake Monitoring Program. The Ambient Lake Monitoring Program was initiated in 2000 in order to better assess the water quality of Iowa lakes. Typically, one location near the deepest part of the lake is sampled, and many chemical, physical, and biological parameters are measured.

Sampling parameters are reported in Table 5-1. At least three sampling events are scheduled every summer, typically between Memorial Day and Labor Day. While the ambient monitoring program can be used to identify trends in overall, in-lake water quality, it does not lend itself to calculation of watershed loads, identification of individual pollutant sources, or the evaluation of BMP implementation.



**Table 5-1. Ambient Lake Monitoring Program Water Quality Parameters.**

Chemical	Physical	Biological
<ul style="list-style-type: none"> <li>• Total Phosphorus (TP)</li> <li>• Soluble Reactive Phosphorus (SRP)</li> <li>• Total Nitrogen (TN)</li> <li>• Total Kjeldahl Nitrogen (TKN)</li> <li>• Ammonia</li> <li>• Un-ionized Ammonia</li> <li>• Nitrate + Nitrite Nitrogen</li> <li>• Alkalinity</li> <li>• pH</li> <li>• Total Organic Carbon</li> <li>• Total Dissolved Solids</li> <li>• Dissolved Organic Carbon</li> </ul>	<ul style="list-style-type: none"> <li>• Secchi Depth</li> <li>• Temperature</li> <li>• Dissolved Oxygen (DO)</li> <li>• Turbidity</li> <li>• Total Suspended Solids (TSS)</li> <li>• Total Fixed Suspended Solids</li> <li>• Total Volatile Suspended Solids</li> <li>• Specific Conductivity</li> <li>• Thermocline Depth</li> <li>• Lake Depth</li> </ul>	<ul style="list-style-type: none"> <li>• Chlorophyll a</li> <li>• Phytoplankton (mass and composition)</li> <li>• Zooplankton (mass and composition)</li> </ul>

**5.2. Expanded Monitoring for Detailed Analysis**

Given current resources and funding, future water quality data collection in the Lake Anita watershed to assess water quality trends and compliance with WQS will be limited. Unless there is local interest in collecting additional water quality data, it will be difficult to implement a watershed management plan and document TMDL effectiveness and water quality improvement.

Data available from the Iowa DNR Ambient Lake Monitoring Program will be used to assess general water quality trends and WQS violations and attainment. More detailed monitoring data is required to reduce the level of uncertainty associated with water quality trend analysis, better understand the impacts of implemented watershed projects (i.e., BMPs), and guide future water quality modeling and BMP implementation efforts.

If the goal of monitoring is to evaluate spatial and temporal trends and differences in water quality resulting from implementation of BMPs, a more intensive monitoring program will be needed. Table 5-2 outlines potential locations, type of monitoring, parameters collected, and the purpose of each type of data collected as part of an expanded monitoring effort. It is unlikely that available funding will allow collection of all data included in Table 5-2, but the information should be used to help stakeholders identify and prioritize data needs. Locations for expanded monitoring in the Lake Anita watershed have been chosen to take into account subbasin boundaries and can be used in assigning nutrient concentrations to each subbasin if deployed in such a manner.

**Table 5-2. Recommended Monitoring Plan.**

Parameter(s)	Intervals	Duration	<sup>1</sup> Location(s)
Routine grab sampling for flow, sediment, P, and N	Every 1-2 weeks	April through October	Ambient location in Lake Anita, plus secondary locations
Continuous flow	15-60 minute	April through October	Lake Anita inlet & outlet
Continuous pH, DO, and temperature	15-60 minute	April through October	Ambient location in Lake Anita
Runoff event flow, sediment, P, and N	15-60-minute intervals during runoff	Five events between April and October	All lake inlets & outlets and select tributary sites
Wet and dry weather flow, sediment, P, and N	Hourly during wet and dry weather	10 to 14-day wet weather periods if continuous sampling is not feasible	All lake inlets & outlets and select tributary sites
Event or continuous tile drain flow, N, and P sampling	15-60 minute	10 to 14-day wet weather periods if continuous sampling is not feasible	Select gully locations
Erosion pin grid	Seasonally, after heavy rainfall events	April through October	Select gully locations
Shoreline mapping, bathymetry studies	Before and after dredging or construction, every 5 years	Design lifespan of waterbody	Lake Anita and upstream sedimentation basins.

(1) Tributary and gully site selection to be based on suspected pollutant source location, BMP placement, landowner permission, and access/installation feasibility.

It may be useful to divide the recommended monitoring plan into several tiers based on ease of deployment and cost effectiveness. This will help stakeholders and management personnel best direct their resources. This monitoring plan may be reevaluated at any time to change the management strategy. Data collection should commence before new BMPs are implemented or existing ones are renovated in the watershed to establish baseline conditions. Selection of tributary sites should consider location of BMPs, location of historical data (for comparative purposes), landowner permission (if applicable), and logistical concerns such as site access and feasibility of equipment installation (if necessary). This data could form the foundation for assessment of water quality trends; however, more detailed information will be necessary to make any statements about water quality trends with certainty. Therefore, routine grab sampling should be viewed only as a starting point for assessing trends in water quality. Possible monitoring scenarios above the current monitoring condition are described below.

#### *Basic Monitoring*

Targeted grab sampling of the Lake Anita ambient monitoring point should be continued on a bi-weekly basis. Grab samples on a seasonal basis at the inlet would be done to support data provided by the main lake.

### *Targeted Monitoring*

Grab samples should continue on a routine and runoff event-based schedule. Flow data may be recorded with manual flow readings based on developed rating curves. Locations and sampling approaches would include the ambient monitoring station and upstream inlets.

### *Advanced Monitoring*

Automated data recorded by ISCO devices would provide information on continuous flow, and continuous pH, DO, and temperature. Routine grab sampling for flow, sediment, P, and N will help provide a check on the automated sampling. In addition to routine sampling, runoff event sampling for event flow, sediment, N, and P will help show the effects of high recurrence interval events. Locations and sampling approaches would include the ambient monitoring station, inlets and outlets of newly constructed sedimentation basins, and outlets from upstream tributaries such as roadway culverts. Reliable long-term flow data is also important because hydrology drives many important processes related to water quality, and a good hydrologic data set will be necessary to evaluate the success of BMPs such as reduced-tillage, saturated buffers, terraces and grassed waterways, riparian buffers, and wetlands.

To further gather information on erosion in the watershed, a “rapid assessment of stream conditions along length” (RASCAL) procedure would be done on gullies and channels that show significant erosion. An initial assessment will provide a benchmark of current conditions and will allow stakeholders to identify potential problem areas for implementation of BMPs.

The proposed monitoring information would assist utilization of watershed and water quality models to simulate various scenarios and water quality response to BMP implementation. Monitoring parameters and locations should be continually evaluated. Adjustment of parameters and / or locations should be based on BMP placement, newly discovered or suspected pollution sources, and other dynamic factors. The Iowa DNR Watershed Improvement Section may provide technical support to locally led efforts in collecting further water quality and flow monitoring data in the Lake Anita watershed. A look at how these proposed monitoring plans may be deployed in the Lake Anita watershed is shown in Figure 5-1.

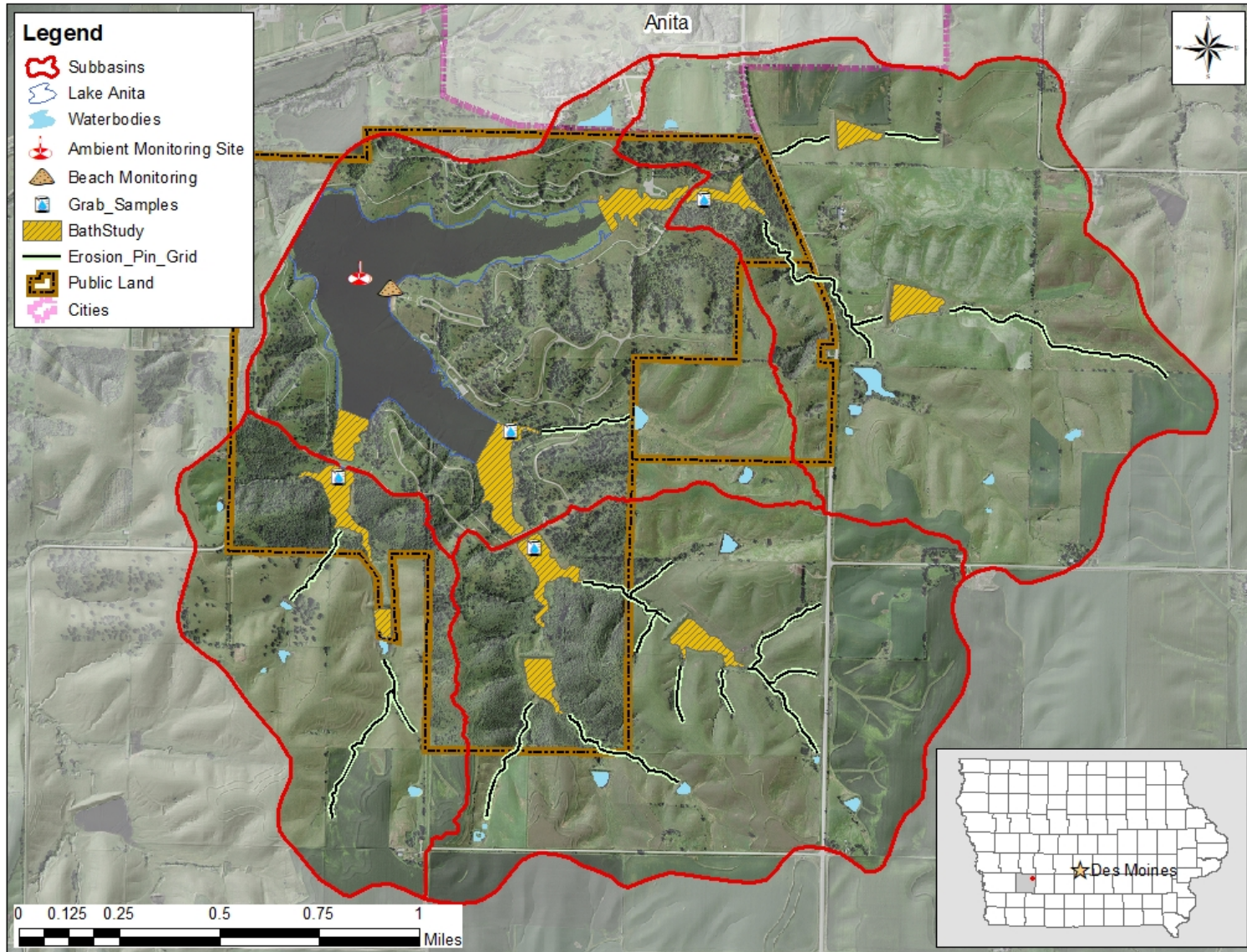


Figure 5-1. Potential Monitoring Locations.

## **6. Public Participation**

Public involvement is important in the Total Maximum Daily Load (TMDL) process since it is the land owners, tenants, and citizens who directly manage land and live in the watershed that determine the water quality in Lake Anita.

### **6.1. Public Meeting**

A virtual presentation was posted on the Iowa DNR's YouTube channel for public viewing on May 19, 2022. A link to the presentation was provided on the Iowa DNR's website at <https://www.iowadnr.gov/environmental-protection/water-quality/watershed-improvement/water-improvement-plans>. The presentation was available for viewing through the public comment period.

### **6.2. Written Comments**

A press release was issued on May 19, 2022 to begin a 30-day public comment period which ends on June 20, 2022. No public comments were received by the Iowa DNR during the public comment period.

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## Appendix A. Glossary of Terms, Abbreviations, and Acronyms

### A.1. Terms

- 303(d) list:** Refers to section 303(d) of the Federal Clean Water Act, which requires a listing of all public surface waterbodies (creeks, rivers, wetlands, and lakes) that do not support their general and/or designated uses. Also called the state's "Impaired Waters List."
- 305(b) assessment:** Refers to section 305(b) of the Federal Clean Water Act, it is a comprehensive assessment of the state's public waterbodies' ability to support their general and designated uses. Those bodies of water which are found to be not supporting their uses are placed on the 303(d) list.
- 319:** Refers to Section 319 of the Federal Clean Water Act, the Nonpoint Source Management Program. Under this amendment, States receive grant money from EPA to provide technical & financial assistance, education, & monitoring to implement local nonpoint source water quality projects.
- AFO:** Animal Feeding Operation. A lot, yard, corral, building, or other area in which animals are confined and fed and maintained for 45 days or more in any 12-month period, and all structures used for the storage of manure from animals in the operation. Open feedlots and confinement feeding operations are considered to be separate animal feeding operations.
- AU:** Animal Unit. A unit of measure used to compare manure production between animal types or varying sizes of the same animal. For example, one 1,000-pound steer constitutes one AU, while one mature hog weighing 200 pounds constitutes 0.4 AU.
- Benthic:** Associated with or located at the bottom (in this context, "bottom" refers to the bottom of streams, lakes, or wetlands). Usually refers to algae or other aquatic organisms that reside at the bottom of a wetland, lake, or stream (see periphyton).
- Benthic macroinvertebrates:** Animals larger than 0.5 mm that do not have backbones. These animals live on rocks, logs, sediment, debris and aquatic plants during some period in their life. They include crayfish, mussels, snails, aquatic worms, and the immature forms of aquatic insects such as stonefly and mayfly nymphs.
- Base flow:** Sustained flow of a stream in the absence of direct runoff. It can include natural and human-induced stream flows. Natural base flow is sustained largely by groundwater discharges.



<b>Biological impairment:</b>	A stream segment is classified as biologically impaired if one or more of the following occurs, the FIBI and or BMIBI scores fall below biological reference conditions, a fish kill has occurred on the segment, or the segment has seen a > 50% reduction in mussel species.
<b>Biological reference condition:</b>	Biological reference sites represent the least disturbed (i.e. most natural) streams in the ecoregion. The biological data from these sites are used to derive least impacted BMIBI and FIBI scores for each ecoregion. These scores are used to develop Biological Impairment Criteria (BIC) scores for each ecoregion. The BIC is used to determine the impairment status for other stream segments within an ecoregion.
<b>BMIBI:</b>	Benthic Macroinvertebrate Index of Biotic Integrity. An index-based scoring method for assessing the biological health of streams and rivers (scale of 0-100) based on characteristics of bottom-dwelling invertebrates.
<b>BMP:</b>	Best Management Practice. A general term for any structural or upland soil or water conservation practice. For example, terraces, grass waterways, sediment retention ponds, reduced tillage systems, etc.
<b>CAFO:</b>	Concentrated Animal Feeding Operation. A federal term defined as any animal feeding operation (AFO) with more than 1,000 animal units confined on site, or an AFO of any size that discharges pollutants (e.g. manure, wastewater) into any ditch, stream, or other water conveyance system, whether man-made or natural.
<b>CBOD5:</b>	5-day Carbonaceous Biochemical Oxygen Demand. Measures the amount of oxygen used by microorganisms to oxidize hydrocarbons in a sample of water at a temperature of 20°C and over an elapsed period of five days in the dark.
<b>CFU:</b>	A Colony Forming Unit is a cell or cluster of cells capable of multiplying to form a colony of cells. Used as a unit of bacteria concentration when a traditional membrane filter method of analysis is used. Though not necessarily equivalent to most probably number (MPN), the two terms are often used interchangeably.
<b>Confinement feeding operation:</b>	An animal feeding operation (AFO) in which animals are confined to areas which are totally roofed.
<b>Credible data law:</b>	Refers to 455B.193 of the Iowa Administrative Code, which ensures that water quality data used for all purposes of the Federal Clean Water Act are sufficiently up-to-date and accurate. To be considered "credible," data must be collected and analyzed using methods and

	protocols outlined in an approved Quality Assurance Project Plan (QAPP).
<b>Cyanobacteria (blue-green algae):</b>	Members of the phytoplankton community that are not true algae but are capable of photosynthesis. Some species produce toxic substances that can be harmful to humans and pets.
<b>Designated use(s):</b>	Refer to the type of economic, social, or ecological activities that a specific waterbody is intended to support. See Appendix B for a description of all general and designated uses.
<b>DNR:</b>	Iowa Department of Natural Resources.
<b>Ecoregion:</b>	Areas of general similarity in ecosystems and in the type, quality, and quantity of environmental resources based on geology, vegetation, climate, soils, land use, wildlife, and hydrology.
<b>EPA (or USEPA):</b>	United States Environmental Protection Agency.
<b>Ephemeral gully erosion:</b>	Ephemeral gullies occur where runoff from adjacent slopes forms concentrated flow in drainage ways. Ephemerals are void of vegetation and occur in the same location every year. They are crossable with farm equipment and are often partially filled in by tillage.
<b>FIBI:</b>	Fish Index of Biotic Integrity. An index-based scoring method for assessing the biological health of streams and rivers (scale of 0-100) based on characteristics of fish species.
<b>FSA:</b>	Farm Service Agency (United States Department of Agriculture). Federal agency responsible for implementing farm policy, commodity, and conservation programs.
<b>General use(s):</b>	Refer to narrative water quality criteria that all public waterbodies must meet to satisfy public needs and expectations. See Appendix B for a description of all general and designated uses.
<b>Geometric Mean (GM):</b>	A statistic that is a type of mean or average (different from arithmetic mean or average) that measures central tendency of data. It is often used to summarize highly skewed data or data with extreme values such as wastewater discharges and bacteria concentrations in surface waters. In Iowa's water quality standards and assessment procedures, the geometric mean criterion for <i>E. coli</i> is measured using at least five samples collected over a 30-day period.
<b>GIS:</b>	Geographic Information System(s). A collection of map-based data and tools for creating, managing, and analyzing spatial information.

<b>Groundwater:</b>	Subsurface water that occurs beneath the water table in soils and geologic formations that are fully saturated.
<b>Gully erosion:</b>	Soil movement (loss) that occurs in defined upland channels and ravines that are typically too wide and deep to fill in with traditional tillage methods.
<b>HEL:</b>	Highly Erodible Land. Defined by the USDA Natural Resources Conservation Service (NRCS), it is land, which has the potential for long-term annual soil losses to exceed the tolerable amount by eight times for a given agricultural field.
<b>IDALS:</b>	Iowa Department of Agriculture and Land Stewardship
<b>Integrated report:</b>	Refers to a comprehensive document that combines the 305(b) assessment with the 303(d) list, as well as narratives and discussion of overall water quality trends in the state's public waterbodies. The Iowa Department of Natural Resources submits an integrated report to the EPA biennially in even numbered years.
<b>LA:</b>	Load Allocation. The portion of the loading capacity attributed to (1) the existing or future nonpoint sources of pollution and (2) natural background sources. Wherever possible, nonpoint source loads and natural loads should be distinguished. (The total pollutant load is the sum of the wasteload and load allocations.)
<b>LIDAR:</b>	Light Detection and Ranging. Remote sensing technology that uses laser scanning to collect height or elevation data for the earth's surface.
<b>Load:</b>	The total amount of pollutants entering a waterbody from one or multiple sources, measured as a rate, as in weight per unit time or per unit area.
<b>Macrophyte:</b>	An aquatic plant that is large enough to be seen with the naked eye and grows either in or near water. It can be floating, completely submerged (underwater), or partially submerged.
<b>MOS:</b>	Margin of Safety. A required component of the TMDL that accounts for the uncertainty in the response of the water quality of a waterbody to pollutant loads.
<b>MPN:</b>	Most Probable Number. Used as a unit of bacteria concentration when a more rapid method of analysis (such as Colisure or Collert) is utilized. Though not necessarily equivalent to colony forming units (CFU), the two terms are often used interchangeably.

<b>MS4:</b>	Municipal Separate Storm Sewer System. A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) owned and operated by a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to state law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the Clean Water Act (CWA) that discharges to waters of the United States.
<b>Nonpoint source pollution:</b>	Pollution that is not released through pipes but rather originates from multiple sources over a relatively large area. Nonpoint sources can be divided into source activities related either to land or water use including failing septic tanks, improper animal-keeping practices, forestry practices, and urban and rural runoff.
<b>NPDES:</b>	National Pollution Discharge Elimination System. The national program for issuing, modifying, revoking and reissuing, terminating, monitoring, and enforcing permits, and imposing and enforcing pretreatment requirements, under Section 307, 402, 318, and 405 of the Clean Water Act. Facilities subjected to NPDES permitting regulations include operations such as municipal wastewater treatment plants and industrial waste treatment facilities, as well as some MS4s.
<b>NRCS:</b>	Natural Resources Conservation Service (United States Department of Agriculture). Federal agency that provides technical assistance for the conservation and enhancement of natural resources.
<b>Open feedlot:</b>	An unroofed or partially roofed animal feeding operation (AFO) in which no crop, vegetation, or forage growth or residue cover is maintained during the period that animals are confined in the operation.
<b>Periphyton:</b>	Algae that are attached to substrates (rocks, sediment, wood, and other living organisms). Are often located at the bottom of a wetland, lake, or stream.
<b>Phytoplankton:</b>	Collective term for all photosynthetic organisms suspended in the water column. Includes many types of algae and cyanobacteria.

<b>Point source pollution:</b>	Pollutant loads discharged at a specific location from pipes, outfalls, and conveyance channels from either municipal wastewater treatment plants or industrial waste treatment facilities. Point sources are generally regulated by a federal NPDES permit.
<b>Pollutant:</b>	As defined in Clean Water Act section 502(6), a pollutant means dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt, and industrial, municipal, and agricultural waste discharged into water.
<b>Pollution:</b>	The man-made or man-induced alteration of the chemical, physical, biological, and/or radiological integrity of water.
<b>PPB:</b>	Parts per Billion. A measure of concentration that is the same as micrograms per liter ( $\mu\text{g/L}$ ).
<b>PPM:</b>	Parts per Million. A measure of concentration that is the same as milligrams per liter ( $\text{mg/L}$ ).
<b>RASCAL:</b>	Rapid Assessment of Stream Conditions Along Length. RASCAL is a global positioning system (GPS) based assessment procedure designed to provide continuous stream and riparian condition data at a watershed scale.
<b>Riparian:</b>	Refers to areas near the banks of natural courses of water. Features of riparian areas include specific physical, chemical, and biological characteristics that differ from upland (dry) sites. Usually refers to the area near a bank of a stream or river.
<b>RUSLE:</b>	Revised Universal Soil Loss Equation. An empirical model for estimating long term, average annual soil losses due to sheet and rill erosion.
<b>Scientific notation:</b>	See explanation on page 72.
<b>Secchi disk:</b>	A device used to measure transparency in waterbodies. The greater the Secchi depth (typically measured in meters), the more transparent the water.
<b>Sediment delivery ratio:</b>	A value, expressed as a percent, which is used to describe the fraction of gross soil erosion that is delivered to the waterbody of concern.
<b>Seston:</b>	All particulate matter (organic and inorganic) suspended in the water column.

<b>SHL:</b>	State Hygienic Laboratory (University of Iowa). Provides physical, biological, and chemical sampling for water quality purposes in support of beach monitoring, ambient monitoring, biological reference monitoring, and impaired water assessments.
<b>Sheet &amp; rill erosion:</b>	Sheet and rill erosion is the detachment and removal of soil from the land surface by raindrop impact, and/or overland runoff. It occurs on slopes with overland flow and where runoff is not concentrated.
<b>Single-Sample Maximum (SSM):</b>	A water quality standard criterion used to quantify <i>E. coli</i> levels. The single-sample maximum is the maximum allowable concentration measured at a specific point in time in a waterbody.
<b>SI:</b>	Stressor Identification. A process by which the specific cause(s) of a biological impairment to a waterbody can be determined from cause-and-effect relationships.
<b>Storm flow (or stormwater):</b>	The discharge (flow) from surface runoff generated by a precipitation event. <i>Stormwater</i> generally refers to runoff that is routed through some artificial channel or structure, often in urban areas.
<b>STP:</b>	Sewage Treatment Plant. General term for a facility that treats municipal sewage prior to discharge to a waterbody according to the conditions of an NPDES permit.
<b>SWCD:</b>	Soil and Water Conservation District. Agency that provides local assistance for soil conservation and water quality project implementation, with support from the Iowa Department of Agriculture and Land Stewardship.
<b>TDS:</b>	Total Dissolved Solids: The quantitative measure of matter (organic and inorganic material) dissolved, rather than suspended, in the water column. TDS is analyzed in a laboratory and quantifies the material passing through a filter and dried at 180 degrees Celsius.
<b>TMDL:</b>	Total Maximum Daily Load. As required by the Federal Clean Water Act, a comprehensive analysis and quantification of the maximum amount of a particular pollutant that a waterbody can tolerate while still meeting its general and designated uses. A TMDL is mathematically defined as the sum of all individual wasteload allocations (WLAs), load allocations (LAs), and a margin of safety (MOS).
<b>Trophic state:</b>	The level of ecosystem productivity, typically measured in terms of algal biomass.

<b>TSI (or Carlson's TSI):</b>	Trophic State Index. A standardized scoring system developed by Carlson (Carlson, 1977) that places trophic state on an exponential scale of Secchi depth, chlorophyll, and total phosphorus. TSI ranges between 0 and 100, with 10 scale units representing a doubling of algal biomass.
<b>TSS:</b>	Total Suspended Solids. The quantitative measure of matter (organic and inorganic material) suspended, rather than dissolved, in the water column. TSS is analyzed in a laboratory and quantifies the material retained by a filter and dried at 103 to 105 degrees Celsius.
<b>Turbidity:</b>	A term used to indicate water transparency (or lack thereof). Turbidity is the degree to which light is scattered or absorbed by a fluid. In practical terms, highly turbid waters have a high degree of cloudiness or murkiness caused by suspended particles.
<b>UAA:</b>	Use Attainability Analysis. A protocol used to determine which (if any) designated uses apply to a particular waterbody. (See Appendix B for a description of all general and designated uses.)
<b>USDA:</b>	United States Department of Agriculture
<b>USGS:</b>	United States Geologic Survey (United States Department of the Interior). Federal agency responsible for implementation and maintenance of discharge (flow) gauging stations on the nation's waterbodies.
<b>Watershed:</b>	The land area that drains water (usually surface water) to a particular waterbody or outlet.
<b>WLA:</b>	Wasteload Allocation. The portion of a receiving waterbody's loading capacity that is allocated to one of its existing or future point sources of pollution (e.g., permitted waste treatment facilities).
<b>WQS:</b>	Water Quality Standards. Defined in Chapter 61 of Environmental Protection Commission [567] of the Iowa Administrative Code, they are the specific criteria by which water quality is gauged in Iowa.
<b>WWTF:</b>	Wastewater Treatment Facility. General term for a facility that treats municipal, industrial, or agricultural wastewater for discharge to public waters according to the conditions of the facility's NPDES permit. Used interchangeably with wastewater treatment plant (WWTP).
<b>Zooplankton:</b>	Collective term for all animal plankton suspended in the water column which serve as secondary producers in the aquatic food chain and the primary food source for larger aquatic organisms.

## A.2. Scientific Notation

Scientific notation is the way that scientists easily handle very large numbers or very small numbers. For example, instead of writing 45,000,000,000 we write  $4.5E+10$ . So, how does this work?

We can think of  $4.5E+10$  as the product of two numbers: 4.5 (the digit term) and  $E+10$  (the exponential term).

Here are some examples of scientific notation.

$10,000 = 1E+4$	$24,327 = 2.4327E+4$
$1,000 = 1E+3$	$7,354 = 7.354E+3$
$100 = 1E+2$	$482 = 4.82E+2$
$1/100 = 0.01 = 1E-2$	$0.053 = 5.3E-2$
$1/1,000 = 0.001 = 1E-3$	$0.0078 = 7.8E-3$
$1/10,000 = 0.0001 = 1E-4$	$0.00044 = 4.4E-4$

As you can see, the exponent is the number of places the decimal point must be shifted to give the number in long form. A **positive** exponent shows that the decimal point is shifted that number of places to the right. A **negative** exponent shows that the decimal point is shifted that number of places to the left.



## Appendix B. General and Designated Uses of Iowa's Waters

### B.1. Introduction

Iowa's water quality standards (Environmental Protection Commission [567], Chapter 61 of the Iowa Administrative Code) provide the narrative and numerical criteria by which waterbodies are judged when determining the health and quality of our aquatic ecosystems. These standards vary depending on the type of waterbody (lakes vs. rivers) and the assigned uses (general use vs. designated uses) of the waterbody that is being dealt with. This appendix is intended to provide information about how Iowa's waterbodies are classified and what the use designations mean, hopefully providing a better general understanding for the reader.

All public surface waters in the state are protected for certain beneficial uses, such as livestock and wildlife watering, aquatic life, non-contact recreation, crop irrigation, and other incidental uses (e.g. withdrawal for industry and agriculture). However, certain rivers and lakes warrant a greater degree of protection because they provide enhanced recreational, economical, or ecological opportunities. Thus, all public bodies of surface water in Iowa are divided into two main categories: *general* use segments and *designated* use segments. This is an important classification because it means that not all of the criteria in the state's water quality standards apply to all water ways; rather, the criteria which apply depend on the use designation & classification of the waterbody.

### B.2. General Use Segments

A general use segment waterbody is one that does not maintain perennial (year-round) flow of water or pools of water in most years (i.e. ephemeral or intermittent waterways). In other words, stream channels or basins that consistently dry up year after year would be classified as general use segments. Exceptions are made for years of extreme drought or floods. For the full definition of a general use waterbody, consult section 61.3(1) in the state's published water quality standards, which became effective on March 22, 2006 (Environmental Protection Commission [567], Chapter 61 of the Iowa Administrative Code).

General use waters are protected for the following beneficial uses: livestock and wildlife watering, aquatic life, non-contact recreation, crop irrigation, and industrial, agricultural, domestic and other incidental water withdrawal uses. The criteria used to ensure protection of these uses are described in section 61.3(2) in the state's published water quality standards, which became effective on March 22, 2006 (Environmental Protection Commission [567], Chapter 61 of the Iowa Administrative Code).

### B.3. Designated Use Segments

Designated use segments are waterbodies that maintain flow throughout the year, or at least hold pools of water that are sufficient to support a viable aquatic community (i.e. perennial waterways). In addition to being protected for the same beneficial uses as the general use segments, these perennial waters are protected for more specific activities such as primary contact recreation, drinking water sources, or cold-water fisheries. There are thirteen different designated use classes (Table B-1) that may apply, and a waterbody may have more than one designated use. For definitions of the use classes and more detailed descriptions, consult section 61.3(1) in the state's published water quality standards, which became effective on March 22, 2006 (Environmental Protection Commission [567], Chapter 61 of the Iowa Administrative Code).

**Table B-1. Designated Use Classes for Iowa Water Bodies.**

<b>Class prefix</b>	<b>Class</b>	<b>Designated use</b>	<b>Brief comments</b>
A	A1	Primary contact recreation	Supports swimming, water skiing, etc.
	A2	Secondary contact recreation	Limited/incidental contact occurs, such as boating
	A3	Children’s contact recreation	Urban/residential waters that are attractive to children
B	B(CW1)	Cold water aquatic life – Type 2	Able to support coldwater fish (e.g. trout) populations
	B(CW2)	Cold water aquatic life – Type 2	Typically, unable to support consistent trout populations
	B(WW-1)	Warm water aquatic life – Type 1	Suitable for game and nongame fish populations
	B(WW-2)	Warm water aquatic life – Type 2	Smaller streams where game fish populations are limited by physical conditions & flow
	B(WW-3)	Warm water aquatic life – Type 3	Streams that only hold small perennial pools which extremely limit aquatic life
	B(LW)	Warm water aquatic life – Lakes and Wetlands	Artificial and natural impoundments with “lake-like” conditions
C	C	Drinking water supply	Used for raw potable water
	HQ	High quality water	Waters with exceptional water quality
Other	HQR	High quality resource	Waters with unique or outstanding features
	HH	Human health	Fish are routinely harvested for human consumption

Designated use classes are determined based on a Use Attainability Analysis, or UAA. This is a procedure in which the waterbody is thoroughly scrutinized, using existing knowledge, historical documents, and visual evidence of existing uses, in order to determine what its designated use(s) should be. This can be

a challenging endeavor, and as such, conservative judgment is applied to ensure that any potential uses of a waterbody are allowed for. Changes to a waterbody's designated uses may only occur based on a new UAA, which depending on resources and personnel, can be quite time consuming.

It is relevant to note that on March 22, 2006, a revised edition of Iowa's water quality standards became effective which significantly changed the use designations of the state's surface waters. Essentially, the changes that were made consisted of implementing a "top down" approach to use designations, meaning that all waterbodies should receive the highest degree of protection applicable until a UAA could be performed to ensure that a particular waterbody did not warrant elevated protection. For more information about Iowa's water quality standards and UAAs, contact the Iowa DNR's Water Quality Bureau.

## Appendix C. Water Quality Data

The following is a summary of the sampling data from the Iowa State University (ISU) Iowa Lakes Information System and University of Iowa State Hygienic Laboratory (SHL) monitoring efforts.

### C.1. Individual Sample Results

**Table C-1. ISU, SHL, and TMDL Water Quality Sampling Data (Ambient Location<sup>(1)</sup>) for Lake Anita.**

Source	Date <sup>(2)</sup>	Secchi (m)	pH	Chl-a (µg/L)	TP (µg/L)	TN (mg/L)	Secchi TSI	Chl-a TSI	TP TSI
ISU	5/30/2006	1.15	8.60	34.0	44.0		58.0	65.2	58.7
ISU	6/26/2006	0.90	8.70	17.9	49.0		61.5	58.9	60.2
ISU	8/1/2006	0.75	8.40	62.9	77.0		64.1	71.2	66.7
SHL	4/23/2007	2.10	8.00	16.0	60.0	0.8	49.3	57.8	63.1
ISU	5/29/2007	1.25	8.20	54.6	62.0		56.8	69.8	63.6
ISU	6/25/2007	1.17	8.40	17.9	58.0		57.7	58.9	62.7
SHL	7/9/2007	0.60	8.50	51.0	70.0	1.4	67.4	69.2	65.4
ISU	7/30/2007	0.45	8.60	73.2	80.0		71.5	72.7	67.3
SHL	9/10/2007	0.80	7.50	34.0	80.0	1.6	63.2	65.2	67.3
SHL	5/12/2008	1.20	8.20	42.0	80.0	1.3	57.4	67.3	67.3
SHL	7/7/2008	1.10	8.50	43.0	70.0	1.2	58.6	67.5	65.4
ISU	6/9/2009	1.80	8.50	12.0	29.7		51.5	55.0	53.0
ISU	7/13/2009	0.80	8.20	38.0	65.0		63.2	66.3	64.3
ISU	8/6/2009	0.40	9.20	35.0	76.0		73.2	65.5	66.6
ISU	6/16/2010	0.80	8.30	35.0	47.8	0.5	63.2	65.5	59.9
ISU	8/3/2010	0.40	7.50	48.0	76.0	1.7	73.2	68.6	66.6
ISU	9/16/2010	0.60	7.80	27.0	62.7	2.4	67.4	62.9	63.8
ISU	6/15/2011	2.10	8.20	14.0	52.4	0.8	49.3	56.5	61.2
ISU	8/2/2011	0.60	9.10	55.0	71.4	0.9	67.4	69.9	65.7
ISU	9/13/2011	0.70	7.90	49.0	81.4	1.3	65.1	68.8	67.5
ISU	6/13/2012	1.00	8.70	23.0	42.1	0.9	60.0	61.4	58.0
ISU	8/1/2012	0.40	8.40	76.0	87.5	1.8	73.2	73.1	68.6
ISU	9/11/2012	0.60	7.70	42.0	138.9	1.3	67.4	67.3	75.2
ISU	6/12/2013	1.20	8.60	14.0	50.7	0.9	57.4	56.5	60.7
ISU	7/31/2013	1.00	8.50	39.0	43.8	1.4	60.0	66.5	58.6
ISU	9/11/2013	0.50	8.30	77.0	80.0	1.6	70.0	73.2	67.3
TMDL	4/16/2014				50.0	1.2			60.5
TMDL	4/17/2014			11.0	40.0	1.0		54.1	57.3
TMDL	4/29/2014			2.0	50.0	0.5		37.4	60.5
TMDL	5/13/2014			4.0	40.0	0.9		44.2	57.3
TMDL	5/27/2014			11.0	50.0	0.7		54.1	60.5
TMDL	6/9/2014			45.0	90.0	0.9		67.9	69.0

ISU	6/18/2014	0.68	8.30	59.0	73.5	1.4	65.6	70.6	66.1
TMDL	6/24/2014			22.0	50.0	1.0		60.9	60.5
TMDL	7/8/2014			16.0	60.0	1.0		57.8	63.1
TMDL	7/23/2014			42.0	80.0	1.4		67.3	67.3
TMDL	8/5/2014			130.0	80.0	1.8		78.4	67.3
ISU	8/6/2014	0.63	8.98	66.2	70.1	2.7	66.7	71.7	65.4
TMDL	8/20/2014			120.0	740.0	1.6		77.6	99.4
TMDL	9/2/2014			86.0	320.0	1.5		74.3	87.3
ISU	9/16/2014	0.50	8.28	97.4	133.7	1.7	70.0	75.5	74.7
TMDL	9/30/2014			140.0	110.0	2.3		79.1	71.9
TMDL	10/15/2014			9.0	70.0	1.5		52.2	65.4
ISU	6/17/2015	2.50	8.30	9.0	24.9	0.6	46.8	52.2	50.5
ISU	8/5/2015	0.50	8.90	70.0	80.0	1.4	70.0	72.3	67.3
ISU	9/15/2015	0.50	8.10	65.0	110.3	1.6	70.0	71.6	71.9
ISU	6/14/2016	1.70	8.70	23.0	40.9	0.5	52.4	61.4	57.6
ISU	8/2/2016	0.50	8.30	80.0	98.9	1.5	70.0	73.6	70.4
ISU	9/11/2016	0.60	7.90	36.0	94.5	1.4	67.4	65.8	69.7
ISU	6/6/2017	1.60	8.70	20.0	22.5	0.8	53.2	60.0	49.0
ISU	7/25/2017	0.60	8.80	30.0	77.3	1.4	67.4	64.0	66.8
ISU	8/28/2017	0.40	8.50	1.7	76.6	1.2	73.2	35.5	66.7
ISU	6/5/2018	1.00	8.30	6.0	34.6	1.1	60.0	48.2	55.2
ISU	7/25/2018	0.50	7.90	86.0	70.9	1.0	70.0	74.3	65.6
ISU	8/30/2018	0.80	7.70	33.0	61.3	0.4	63.2	64.9	63.5
ISU	6/11/2019	1.68	8.50	0.6	10.0	0.9	52.6	25.6	37.3
ISU	7/31/2019	0.53	8.24	16.5	10.0	0.6	69.1	58.1	37.3
ISU	9/8/2019	0.43	8.17	4.0	119.8	0.8	72.2	44.2	73.1
ISU	6/3/2020	1.50	8.40	16.4	24.8	0.4	54.2	58.0	50.4
ISU	7/20/2020	0.60	8.50	44.4	52.0	0.4	67.4	67.8	61.1
ISU	9/23/2020	0.50	8.10	20.6	37.0	0.9	70.0	60.3	56.2
ISU	6/2/2021	2.2	8.16	8.7	24.0	1.2	49.0	51.9	49.9
ISU	7/27/2021	0.6	8.22	42.2	54.0	1.5	66.8	67.3	61.6
ISU	9/13/2021	0.5	7.90	53.0	49.0	1.2	69.3	69.5	60.2
<b>Median<sup>(3)</sup></b>	--	<b>0.69</b>	<b>8.30</b>	<b>35.0</b>	<b>63.85</b>	<b>1.225</b>	<b>65.3</b>	<b>65.5</b>	<b>64.0</b>

(1) Ambient monitoring location = STORET ID 22150002

(2) Data between 2016 – 2020 were used for the 2022 Water Quality Assessment Period.

(3) Median period is from 2006-2021.

**C.2. Annual Precipitation and TSI Data**

**Table C-2. Precipitation and Annual Median TSI Values for Lake Anita.**

<b>Date</b>	<b>Annual Precipitation (in)</b>	<b>Apr-Sep Precipitation (in)</b>	<b>Secchi TSI</b>	<b>Chl-a TSI</b>	<b>TP TSI</b>
2006	39.6	29.8	61.2	65.1	61.9
2007	46.6	29.0	61.0	65.6	64.9
2008	43.0	34.3	58.0	67.4	66.3
2010	44.4	29.1	62.6	62.2	61.3
2011	43.1	36.2	67.9	65.7	63.4
2012	30.0	22.9	60.6	65.1	64.8
2013	24.3	14.5	66.9	67.2	67.3
2014	29.2	21.3	62.5	65.4	62.2
2015	36.2	29.7	67.4	63.9	67.9
2016	47.0	34.1	62.3	65.3	63.2
2017	42.8	34.2	63.2	66.9	65.9
2018	35.5	25.1	64.6	53.2	60.8
2019	43.9	33.3	64.6	42.6	49.3
2020	18.8	11.9	63.8	62.0	55.9
2021	28.7	16.6	61.7	62.9	57.3
<b>Average</b>	<b>37.3</b>	<b>27.2</b>	<b>62.9</b>	<b>65.1</b>	<b>62.7</b>

(1) Precipitation values are averages TSI values are annual median.

## Appendix D. Watershed Model Development

Watershed and in-lake modeling were used in conjunction with analysis of observed water quality data to develop the Total Maximum Daily Load (TMDL) for the algae impairment to Lake Anita in Cass County, Iowa. This TMDL targets an allowable phosphorus load that will satisfy the primary contact recreation impairment (see Section 3 of this document for details). Reduction of phosphorus is expected to reduce algal blooms and non-algal turbidity, which decrease water clarity and impair the ability of the public to enjoy the recreational benefits of the lake.

The Spreadsheet Tool for Estimating Pollutant Load (STEPL), version 4.4, was utilized to simulate watershed hydrology and pollutant loading. In-lake water quality simulations were performed using BATHTUB 6.1, an empirical lake and reservoir eutrophication model. The integrated watershed and in-lake modeling approach allows the holistic analysis of hydrology and water quality in Lake Anita and its watershed. This section of the Water Quality Improvement Plan (WQIP) discusses the modeling approach and development of the STEPL watershed and BATHTUB lake models.

### D.1. Modeling Approach

Data from a 16-year period of record, 2006-2021, were analyzed and used to develop watershed and lake models for the simulation and prediction of phosphorus loads and in-lake response. This simulation period is supplemental to the water quality assessment period (2016-2020) upon which the 2022 Integrated Report and 303(d) list were generated.

### D.2. STEPL Model Description

STEPL is a watershed-scale hydrology and water quality model developed for the U.S. Environmental Protection Agency (EPA) by Tetra Tech, Incorporated. STEPL is a long-term average annual model used to assess the impacts of land use and best management practices on hydrology and pollutant loads. STEPL is capable of simulating a variety of pollutants, including sediment, nutrients (nitrogen and phosphorus), and 5-day biochemical oxygen demand (BOD5). Required input data is minimal if the use of model default county-wide soils and coarse precipitation information is acceptable to the user. If available, the user can modify soil and precipitation inputs with higher resolution and local soil and precipitation data. Precipitation inputs include average annual rainfall and rainfall correction factors that describe the intensity (i.e., runoff producing) characteristics of long-term precipitation. Characteristics that affect STEPL estimates of hydrology and pollutant loading include land cover types, population of agricultural livestock, wildlife populations, population served by septic systems, and urban land uses. STEPL also quantifies the impacts of manure application and best management practices (BMPs). Almost all STEPL inputs can be customized if site-specific data is available and more detail is desired.

The watershed was divided into four subbasins to help quantify the relative pollutant loads stemming from different areas of the watershed and to assist with targeting potential BMP locations. The basins were created to coincide with the natural drainage network and physical features as shown in Figure D-1. Hydrology and pollutant loadings are summarized for each subbasin and also aggregated as watershed totals.

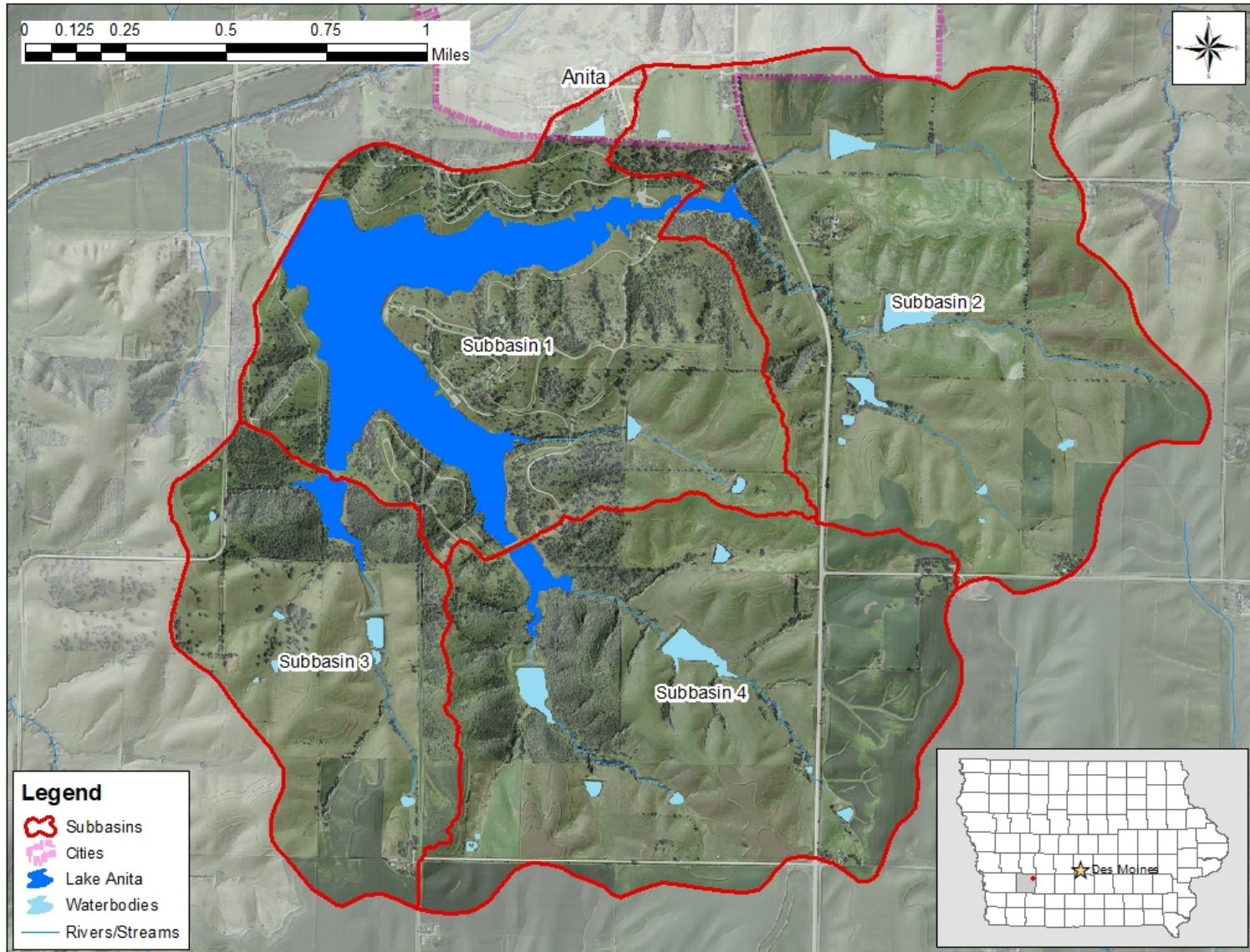


Figure D-1. STEPL Subbasin Map.



### D.3. Meteorological Input

#### Precipitation Data

The STEPL model includes a pre-defined set of weather stations from which the user may obtain precipitation-related model inputs. Unfortunately, none of the NWS COOP stations within a reasonable distance of Lake Anita are included in the STEPL model. Therefore, rainfall data from the Iowa Environmental Mesonet network were used for modeling purposes. Weather station information and rainfall data were reported in Section 2.1 (See Table 2-2, Figure 2-2, and Figure 2-3). Annual rainfall used in the STEPL model was the 2006-2021 average of 37.3 inches/year, which was slightly higher than the 30-year precipitation average (1992-2021) of 36.3 inches.

The STEPL precipitation correlation and rain day correction factors were calculated outside of STEPL and entered directly in the STEPL “Input” worksheet to override the default rainfall data. Precipitation data from the modeling period of 2006-2021 were utilized in parameterization. The rain day correction factor of 0.406 was calculated by dividing the number of days that it rained at least 5 mm by the number of days with at least 0.254 mm (0.01 inches) of rainfall. This ratio is intended to estimate the number of days that could potentially generate surface runoff. Precipitation inputs are reported in Table D-1, as entered in the “Input” worksheet of the Lake Anita STEPL model.

**Table D-1. STEPL Rainfall Inputs (2006-2021 Average Annual Data).**

Rain Correction Factors			
0.887 <sup>(1)</sup>	0.406 <sup>(2)</sup>		
Annual Rainfall <sup>(3)</sup>	Rain Days <sup>(4)</sup>	Avg. Rain/Event <sup>(5)</sup>	Input Notes/Descriptions
37.3	111	0.735	(1) The percent of rainfall that exceeds 5 mm per event
			(2) The percent of rain events that generate runoff
			(3) Annual average precipitation for modeling period (in)
			(4) Average days of precipitation per year (days)
			(5) Average precipitation per event (in)

### D.4. Watershed Characteristics

#### Topography

The Lake Anita watershed was delineated into four subbasins using ArcGIS (version 10.7) and a 3-meter resolution digital elevation model (DEM) developed by the Iowa Department of Natural Resources (DNR). The subbasins boundaries were chosen to coincide with natural and artificial boundaries. These will aid in prioritizing areas for future BMP implementation for water quality improvement. Figure D-1 illustrates the watershed and subbasin boundaries.

#### Land Use

A Geographic Information System (GIS) coverage of land use information was developed using the Cropland Data Layer (CDL) for year 2019, which was obtained from the United States Department of Agriculture – National Agricultural Statistics Service (USDA-NASS, 2019). The CDL land cover data is summarized by Common Land Units (CLUs). According to the USDA – Farm Service Agency, CLUs are the smallest units of land that have a permanent, contiguous boundary, common land cover, common owner, and common producer (USDA-FSA, 2017). Because land cover pixels are much smaller than CLU field boundaries, many CLUs have one primary land cover, but small isolated pixels with several minor land cover types. In those cases, the dominant land cover within each CLU boundary was determined

using a zonal statistic command within Spatial Analyst. This step served as a land cover “filter” to simplify the data and eliminate small isolated pixels of various land uses within a single field boundary. STEPL land cover classifications are reported in Table D-2, with land use distribution previously illustrated in the map (Figure 2-4) and table (Table 2-3) in Section 2.

**Table D-2. STEPL Land Use Acreage Inputs.**

Watershed	Urban <sup>(1)</sup>	Cropland	Pastureland	Forest	User Defined <sup>(2)</sup>	<sup>3</sup> Total
W1	37.6	0.7	93.6	131.5	254.1	517.5
W2	31.7	88.8	446.2	50.7	114.7	732.1
W3	11.0	51.7	203.6	73.0	21.1	360.3
W4	25.8	164.5	312.4	134.7	38.0	675.4
<sup>3</sup> Total	<b>106.0</b>	<b>305.6</b>	<b>1,055.7</b>	<b>389.9</b>	<b>427.9</b>	<b>2,285.2</b>

- (1) Urban includes all developed areas, including roads and farmsteads.
- (2) Includes hay / alfalfa, non-pasture grassland and conservation reserve programs.
- (3) Totals exclude open water in STEPL land use inputs.

Each land cover type was assigned a specific USLE C-factor, based on regional estimates developed by the Iowa DNR and Iowa Department of Agriculture (IDALS) personnel. C-factors vary from 0.010 to 0.199. P-factor, support practice factor, was determined based on default values in the STEPL model for Cass County, Iowa.

**Table D-3. C and P Factors for each Land Use.**

Land Use Description	C-Factor	P-Factor
Cropland <sup>(1)</sup>	0.199	0.813
Pastureland	0.010	1.0
Forest	0.010	1.0
User Defined <sup>(2)</sup>	0.007	1.0

- (1) Row Crop = Corn and Soybeans
- (2) User Defined = Un-grazed Grassland, Alfalfa/Hay

### Soils

Soils are discussed in Section 2.2. The hydrologic soil group (HSG) and the USLE K-factor are the critical soil parameters in the STEPL model. Soils in the watershed are predominantly HSG type C (73.7%) with some C/D and D soils interspersed. HSG values were set at type C, which was the dominate soil type in each subbasin. USLE K-factors are specific to each soil type, and were area-weighted and entered into the “Input” worksheet in the STEPL model.

### Slopes

Slopes are described in more detail in Section 2.2. USLE land slope (LS) factors were obtained using 3-meter LiDAR data for Cass County, Iowa and from the subroutine Ls-factor, field based, Quantum GIS (QGIS) based on specific land use. LS-factor were then area-weighted to develop land use specific LS factors for each STEPL subbasin. Resulting LS-factors entered into the “Input” worksheet in the STEPL model vary between 1.027 and 2.610 as shown in Table D-4.

**Table D-4. STEPL LS-Factors.**

Watershed	Cropland	Pastureland	Forest	User-Defined
W1	1.027	2.282	2.538	2.242
W2	1.518	2.512	2.550	2.610
W3	1.441	2.458	2.578	2.509
W4	1.516	2.575	2.787	2.146

**Curve Numbers**

The STEPL model includes default curve numbers (CNs) selected automatically based on HSG and land use. CN values for each subbasin are shown in Table D-5.

**Table D-5. STEPL Curve Numbers.**

Subwatershed	Urban <sup>(1)</sup>	Cropland	Forest	Pastureland	User Defined <sup>(2)</sup>
W1 <sup>(3)</sup>	92	85	73	79	71
W2 <sup>(3)</sup>	92	85	73	79	71
W3 <sup>(3)</sup>	92	85	73	79	71
W4 <sup>(3)</sup>	92	85	73	79	71

- (1) Urban includes all developed areas, including transportation and farmstead areas.
- (2) User defined Includes Grassland and Alfalfa/Hay
- (3) HSG Type C.

*Sediment Delivery Ratio*

The sediment load to Lake Anita will be dependent upon watershed morphology, water velocity, residence time, and other factors. The sediment load to the lake is smaller than total sheet and rill erosion because some of the eroded material is deposited in depressions, ditches, or streams before it reaches the watershed outlet (i.e., the lake). The sediment delivery ratio (SDR) is the portion of sheet and rill erosion that is transported to the watershed outlet. STEPL calculates the SDR for each subbasin using a simple empirical formula based on drainage area (i.e., subbasin area). The resulting SDR value for the Lake Anita watershed is 0.225

*Best Management Practices*

STEPL is able to simulate load reduction efficiencies for a variety of urban and agricultural BMPs in each subbasin. Reductions are dependent on the overall efficiency of each practice and the area of the BMP to which it is applied. BMP's modeled in the watershed are sediment basins (SB), contour farming (CF), and buffer strips (BSt). There are eight sediment basins in the watershed. However, for modeling purposes only two sediment basins were included in the model. All the sediment basins appear to have been constructed between 1967 and 2005. It is assumed that the sediment basins not included in the model have exceeded their life expectancy. Three of the basins are extensions of Lake Anita, which was constructed in 1970. One of the sediment basins included in the STEPL model is located on the east branch of Lake Anita and was renovated between 2013 and 2015. The other sediment basin included with the STEPL model was constructed in 2005. These sediment basins are owned and maintained by either the State of Iowa or the Cass County Soil and Water Conservation District. Figure D-2 shows the land subject to BMP's and the sediment basins included with the STEPL model.

Where the BMP's are in series or in parallel, a BMP calculator was used to calculate a composite BMP removal efficiency. These values were entered into the appropriate cells in the "BMPs" worksheet in STEPL. For modeling purposes, it was assumed that the sediment basins were operating at 50 percent of optimal efficiency. By only modeling two sediment basins and assuming their efficiency is 50 percent below optimum efficiency it would tend to be a conservative approach of the amount of sediment and phosphorus removed upstream of Lake Anita. The BMP reduction efficiencies for phosphorus for each subbasin are listed in Table D-6.

**Table D-6. BMP Composite Reduction Efficiencies for Phosphorus Removal.**

<b>Subbasin</b>	<b>Cropland</b>	<b>Pasture</b>	<b>Forest</b>	<b>User Defined</b>
W1	0.000	0.000	0.000	0.000
W2	0.424	0.258	0.258	0.258
W3	0.374	0.000	0.000	0.000
W4	0.386	0.104	0.000	0.082

Efficiencies shown are composite efficiencies.

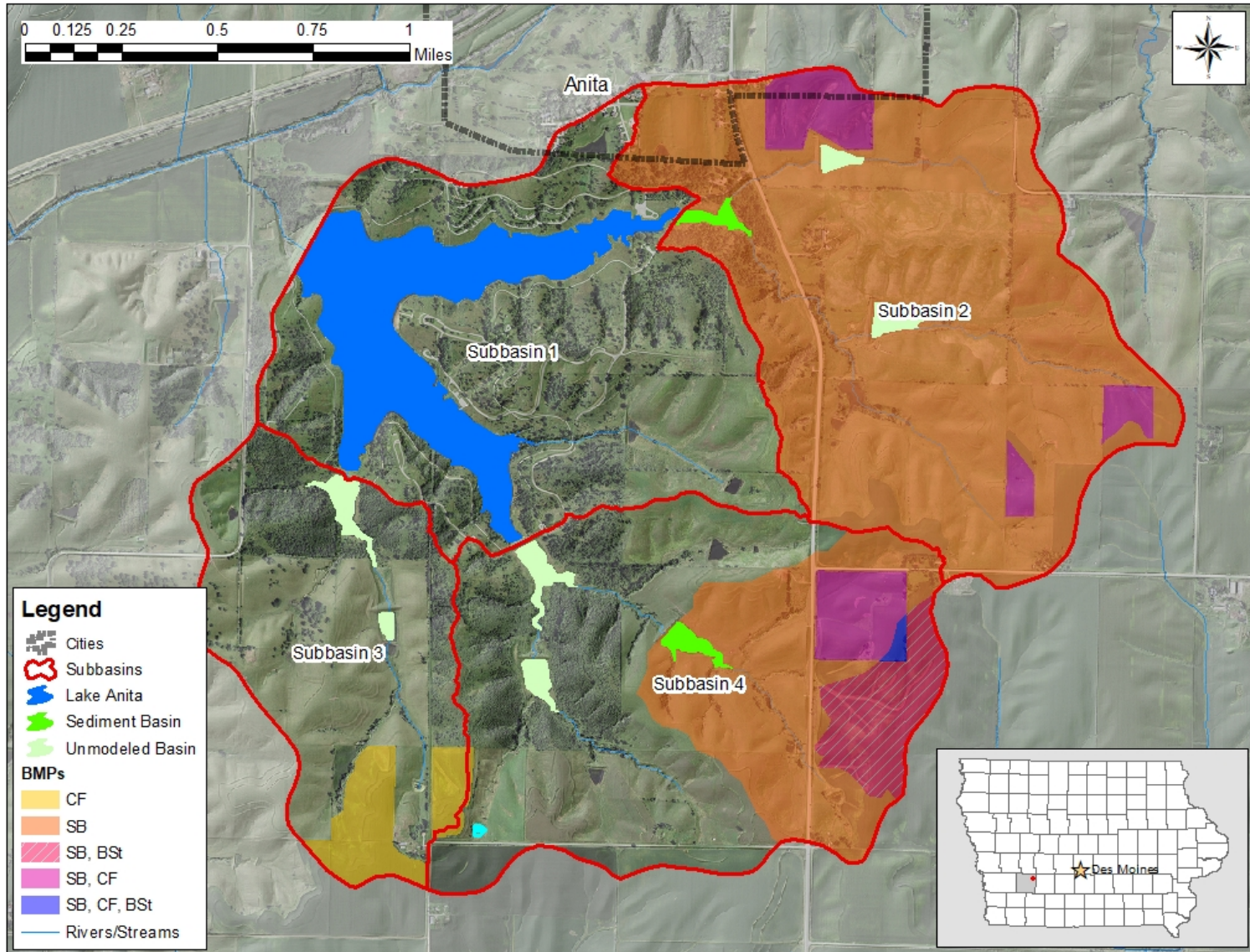


Figure D-2. Lake Anita BMP Map.

## D.5. Animals

### *Agricultural Animals and Manure Application*

The STEPL model utilizes livestock population data and the duration (in months) that manure is applied to account for nutrient loading from livestock manure application. Based on available information there are four animal feeding operations within approximately one-half mile away from the Lake Anita watershed. Review of available manure management plans (MMP) showed that there are no facilities within the watershed that have a MMP. However, it is still assumed that manure will be applied twice a year to cropland in subbasins 2, 3, and 4 and twice a year to pastureland in all subbasins. Table D-7 lists the number and type of animals, the animal equivalent units (AEU) normalized per acre, and number of months manure is applied. The number of livestock in the watershed were obtained from the Input Data Server for STEPL located on EPA's website (EPA, 2021). The number of livestock animals was based on a HUC-12 bases, which were assigned based on the ratio of the subbasin area to HUC-12 area.

**Table D-7. Agricultural Animals and Manure Application.**

<b>Watershed</b>	<b>Beef Cattle</b>	<b>Swine (Hog)</b>	<b>Sheep</b>	<b>Horse</b>	<b>AEU</b>	<b># of months manure applied to Cropland<sup>(1)</sup></b>	<b># of months manure applied to Pastureland</b>
W1	109	422	6	1	283.3	0	2
W2	120	464	6	2	2.4	2	2
W3	59	230	3	1	2.1	2	2
W4	111	431	6	2	1.2	2	2
<b>Totals</b>	<b>399</b>	<b>1,547</b>	<b>21</b>	<b>6</b>	<b>289.0</b>	<b>--</b>	<b>--</b>

(1) No manure is applied to cropland in subbasin 1 however, manure is applied twice per year to cropland in subbasins 2, 3, & 4 and to pastureland in all subbasins.

### *Livestock Grazing*

Based on land use coverage, pastureland is the dominant land use in the watershed at 42.4%. Erosion from pasture (and other grassland that may be in poor condition) carries sediment-bound phosphorus, which is accounted for by using a sediment nutrient enrichment ratio. The STEPL default enrichment ratio is 2.0. STEPL simulates nutrient loss in pasture and grassland runoff by assuming a phosphorus concentration of 0.3 mg/L in the runoff. Similarly, a phosphorus concentration of 0.063 was used to simulate phosphorus loads from shallow groundwater in grazed areas.

### *Open Feedlots*

There are no open feedlots in the Lake Anita watershed in the Iowa DNR Animal Feeding Operations Database. Feedlot operators are not required to report open feedlot information to Iowa DNR for feedlots with fewer than 1,000 animal units (AUs). No active open feedlot operations were observed during the November 2021 windshield survey.

### *Wildlife*

Due to insufficient data, population densities were assumed to be as follows: 200 geese, 10, deer, 10 raccoons, 10 beavers, and 10 other per square mile were used to account for other wildlife (e.g., furbearers, upland birds, etc.).

### *Septic Systems*

A GIS coverage of rural residences with private onsite wastewater treatment systems (e.g., septic systems) was developed using aerial images. This procedure resulted in the identification of 32 septic systems in the watershed. It is estimated that 20 percent (Lee, 2012) of these systems are not functioning adequately (i.e., are ponding or leaching). This is a fairly common occurrence in some rural parts of the state. This information is included in the “Inputs” worksheet of the STEPL model for Lake Anita.

### **D.6. References**

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## Appendix E. Water Quality Model Development

Two models were used to develop the Total Maximum Daily Load (TMDL) for Lake Anita. Watershed hydrology and pollutant loading was simulated using the Spreadsheet Tool for Estimating Pollutant Load (STEPL), version 4.4. STEPL model development was described in detail in Appendix D.

In-lake water quality simulations were performed using BATHTUB 6.14, an empirical lake and reservoir eutrophication model. The BATHTUB model developed for Lake Anita does not simulate dynamic conditions associated with storm events or individual growing seasons. Rather, the model predicts average water quality in the modeling period of 2006-2021, which includes the 2022 Integrated Report (2016-2020). This appendix discusses development of the BATHTUB model. The integrated watershed and in-lake modeling approach allows the holistic analysis of hydrology and water quality in Lake Anita and its watershed.

### E.1. BATHTUB Model Description

BATHTUB is a steady-state water quality model developed by the U.S. Army Corps of Engineers that performs empirical eutrophication simulations in lakes and reservoirs (Walker, 1999). Eutrophication-related parameters are expressed in terms of total phosphorus (TP), total nitrogen (TN), chlorophyll-a (chl-a), and transparency. The model can distinguish between organic and inorganic forms of phosphorus and nitrogen, and simulates hypolimnetic oxygen depletion rates. Water quality predictions are based on empirical models that have been calibrated and tested for lake and reservoir applications (Walker, 1985). Control pathways for nutrient levels and water quality response are illustrated in Figure E-1.

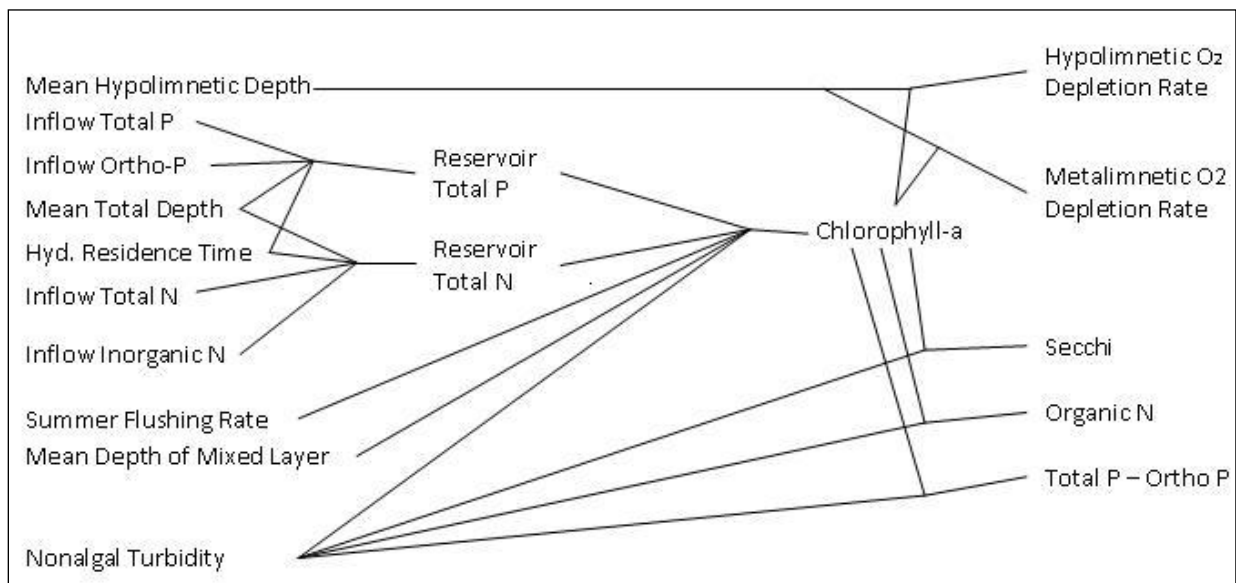


Figure E-1. Eutrophication Control Pathways in BATHTUB (Walker, 1999)

### E.2. Model Parameterization

BATHTUB includes several data input menus and modules to describe lake characteristics, simulation equations, and external (i.e., watershed) inputs. Data menus utilized to develop the BATHTUB model for Lake Anita include: model selections, global variables, segment data, and tributary data. The model selections menu allows the user to specify which modeling equations (i.e., empirical relationships) are



used in the simulation of in-lake nitrogen, phosphorus, chl-a, transparency, and other parameters. The global variables menu describes parameters consistent throughout the lake such as precipitation, evaporation, and atmospheric deposition. The segment data menu is used to describe lake morphometry, observed water quality, calibration factors, and internal loads in each segment of the lake or reservoir. The tributary data menu specifies nutrient loads to each segment using mean flow and concentration in the averaging period. The following sub-sections describe the development of the Lake Anita BATHTUB model and report input parameters for each menu.

*Model Selections*

BATHTUB includes several models and empirical relationships for simulating in-lake nutrients and eutrophication response. For TP, TN, chl-a, and transparency, Models 1 and 2 are the most general formulations, based upon model testing results (Walker, 1999). Alternative models are provided in BATHTUB to allow use of other eutrophication models, evaluate sensitivity of each model, and facilitate water quality simulation in light of data constraints.

Table E-1 reports the models selected for each parameter used to simulate eutrophication response in Lake Anita. Preference was given to Models 1 and 2 during evaluation of model performance and calibration of the Lake Anita model, but final selection of model type was based on applicability to lake characteristics, availability of data, and agreement between predicted and observed data. The default models were left to predict in-lake phosphorus and transparency levels because it provided the best agreement with observed data, and because Lake Anita is a manmade impoundment and representative of aquatic systems for which these specific models were developed. Chlorophyll model selection was based on observed data agreement and applicability based on BATHTUB user manual IR-W-96 table 4.2. Model performance is discussed in more detail in Appendix F.

**Table E-1. Model selections for Lake Anita.**

Parameter	Model No.	Model Description
Total Phosphorus	*01	2 <sup>nd</sup> order, Avail. P
Total Nitrogen	01	2 <sup>nd</sup> order, Avail. N
Chlorophyll-a	*02	P. Light. T
Transparency	*01	vs CHLA & Turbidity
Longitudinal Dispersion	*01	Fischer-Numeric
Phosphorus Calibration	02	Concentrations
Nitrogen Calibration	02	Concentrations
Availability Factors	*00	Ignore

\* Asterisks indicate BATHTUB defaults

*Global Variables*

Global input data for Lake Anita are reported in Table E-2. Global variables are independent of watershed hydrology or lake morphometry, but affect the water balance and nutrient cycling of the lake. The first global input is the averaging period. Both seasonal and annual averaging periods are appropriate, depending on site-specific conditions. An annual averaging period was utilized to quantify existing loads and in-lake water quality, and to develop TMDL targets for Lake Anita.

**Table E-2. Global Variables Data for Simulation Period.<sup>1</sup>**

Parameter	Observed Data	BATHTUB Input
Averaging Period	Annual	1.0 years
<sup>1</sup> Precipitation	37.3 in	0.948 m
<sup>1</sup> Evaporation	51.9 in	1.318 m
<sup>2</sup> Increase in Storage	0	0
<sup>3</sup> Atmospheric Loads:		
TP	0.3 kg/ha-yr	30 mg/m <sup>2</sup> -yr
TN	7.7 kg/ha-yr	770.3 mg/m <sup>2</sup> -yr

- (1) Precipitation and evaporation data are from 2006-2021 in order to provide accurate long-term data
- (2) Change in lake volume from beginning to end of simulation period.
- (3) From Anderson and Downing, 2006.

Precipitation was summarized for the 16-year assessment period of 2006-2021 from the Iowa Mesonet network collected and discussed in Chapter 2. Potential evapotranspiration data for the same period was obtained from the Lewis, Iowa weather station via the ISU Ag Climate database (IEM, 2021b). Net change in reservoir storage was assumed to be zero. This 16-year period was chosen in order to reflect the climate during the assessment period when water quality data was collected and analyzed to show the algal and non-algal impairments at Lake Anita. It was shown in Section 3.1 (Figure 3-9 through Figure 3-11) that precipitation is not highly correlated with total phosphorus and the impairment seen at Lake Anita. These data were summarized and converted to BATHTUB units and entered in the global data menu. Atmospheric deposition rates were obtained from a regional study (Anderson and Downing, 2006). Nutrient deposition rates are assumed constant from year to year.

#### *Segment Data*

Lake morphometry, observed water quality, calibration factors, and internal loads are all included in the segment data menu of the BATHTUB model. Separate inputs can be made for each segment of the lake or reservoir system that the user wishes to simulate. In lakes with simple morphometry and one primary tributary, simulation of the entire lake as one segment is often acceptable. If evaluation of individual segments of the lake (or inflowing tributaries) is desirable, the lake can be split into multiple segments. Each segment may have a distinct tributary.

The Lake Anita BATHTUB model includes four segments to facilitate simulation of diffusion, dispersion, and sedimentation that occur as water traverses between the upstream segments and Lake Anita. The relationship between watershed basins and the BATHTUB segment is shown in Table E-3. The ambient monitoring location is used for listing and delisting purposes: therefore, the TMDL target applies at the ambient monitoring location in that segment.

Segment morphometry was calculated in the model. Bathymetric survey data and ESRI GIS software was used to estimate segment surface area, mean depth, and segment length. Segment physical parameters input into BATHTUB for the lake system area shown in Table E-3.

**Table E-3. Segment Morphometry for the Lake Anita.**

Segment	Outflow Segment	Segment Group	Surface Area (km <sup>2</sup> )	Mean Depth (m)	Length (km)
01 Segname 1	Out of Reservoir	1	0.644	3.99	4.84
02 Segname 2	01 Segname 1	1	0.016	2.84	1.07
03 Segname 3	01 Segname 1	1	0.029	1.63	1.29
04 Segname 4	01 Segname 1	1	0.028	1.02	0.56

Mean water quality parameters observed for the modeling period (2006-2021) are reported in Table E-4. The data in Table E-4 were compared to output in segment “01 Segname 1” of the BATHUB model to evaluate model performance and calibrate the BATHUB and STEPL models for each scenario. The TMDL and future water quality assessment and listing will be based solely on water quality data from the ambient monitoring location in segment “01 Segname 1”.

**Table E-4. Ambient Water Quality (2006-2021 Annual Median) for Lake Anita.**

Parameter	Measured Data	<sup>1</sup> BATHUB Input
Total Phosphorus	63.9 µg/L	63.9 ppb
Total Nitrogen	1.225 mg/L	1,225 ppb
Chlorophyll-a	35.0 µg/L	35.0 ppb
Secchi Depth	0.69m	0.69 m

- (1) Measured or monitored data converted to units required by BATHUB  
ppb = parts per billion = micrograms per liter (µg/L)

#### Tributary Data

The empirical eutrophication relationships in the BATHUB model are influenced by the global and segment parameters previously described, but are heavily driven by flow and nutrient loads from the contributing drainage area (watershed). Flow and nutrient loads can be input to the BATHUB model in a number of ways. Flow and nutrient loads used in the development of the Lake Anita BATHUB model utilize watershed hydrology and nutrient loads predicted using the STEPL model described in Appendix D. Output from STEPL includes annual average flow and nutrient loads. Table E-5 summarizes the physical parameters and monitored inputs for Lake Anita.

**Table E-5. Flow and Transport Linkages in STEPL and BATHUB**

Tributary Name	BATHUB Receiving Segment	Total Watershed Area (km <sup>2</sup> )	Avg Period Flow Rate (hm <sup>3</sup> /yr)	STEPL Total P Concentration (ppb)
Trib 1	Segname 1	2.09	0.583	309.5
Trib 2	Segname 1	2.96	0.916	359.2
Trib 3	Segname 1	1.46	0.450	491.5
Trib 4	Segname 1	2.73	0.864	484.4

### **E.3. References**

Anderson, K., and J. Downing. 2006. Dry and wet atmospheric deposition of nitrogen, phosphorus, and silicon in an agricultural region. *Water, Air, and Soil Pollution*, 176:351-374.

Iowa Environmental Mesonet (IEM). 2021a. Iowa State University Department of Agronomy. Iowa Ag Climate Network. Download available at <http://mesonet.agron.iastate.edu/request/coop/fe.phtml>  
Accessed in March 2018.

Iowa Environmental Mesonet (IEM). 2021b. Iowa State University Department of Agronomy. Iowa Ag Climate Network. Download available at  
<http://mesonet.agron.iastate.edu/agclimate/hist/dailyRequest.php>.  
Accessed in March 2018.

## Appendix F. Model Performance and Calibration

The Lake Anita watershed and water quality models were calibrated by comparing simulated and observed local and regional data. The primary source of calibration data is the ambient lake monitoring data collected by Iowa State University (ISU) and the University of Iowa State Hygienic Laboratory (SHL) between 2006 and 2021. Literature values and results from regional studies regarding sediment and phosphorus exports in similar watersheds were also utilized to evaluate model performance. Calibration was an iterative process that involved running both the watershed model (STEPL) and in-lake model (BATHTUB), and refining model parameters to (1) produce simulated values that were within reasonable ranges according to similar studies, and (2) provide good agreement with observed water quality in Lake Anita.

### F.1. STEPL Performance and Calibration

The STEPL model is a long-term average annual simulation model, and is incapable of simulating storm events or short-term fluctuations in hydrology and nutrient loads. There is no long-term monitoring data for tributaries in the Lake Anita watershed; therefore, model calibration relied heavily upon sediment and phosphorus exports reported in similar watersheds in the region. Table F-1 reports estimated sheet and rill erosion rates found in several Iowa watersheds that are similar composition or proximate in location. Values for Lake Anita watershed are before BMP reductions.

**Table F-1. Sheet and Rill Erosion in Southern Iowa Drift Plain Watersheds.**

Watershed	County	Area (acres)	Proximity (miles)	Erosion (tons/ac/yr)
Lake Hawthorn	Mahaska	3,289	120	5.3
Badger Creek Lake	Madison	11,397	45	3.9 – 4.5
Lake Miami	Monroe	3,595	103	2.3
Lake of the Hills	Scott	1,683	213	2.8
Prairie Rose Lake	Shelby	4,655	26	1.1
Thayer Lake	Union	485	46	4.5
Green Valley Lake	Union	5,175	30	2.6
Meadow Lake	Adair	821	18	2.2
Lake Ahquabi	Warren	3,288	62	5.0
<b>Lake Anita<sup>(1)</sup></b>	<b>Cass</b>	<b>2,491.4</b>	<b>--</b>	<b>2.0</b>

(1) Annual sheet/rill erosion estimated for this TMDL using STEPL (2006-2021).

The Lake Anita STEPL model predicts sheet and rill erosion rates that are consistent with those predicted by DNR for other watersheds in the area. The 2006-2021 simulated annual average sheet and rill erosion rate was 2.0 tons/acre, compared with average estimated rates between 1.1 to 5.3 tons/acre/year estimated in other watersheds in the Southern Iowa Drift Plain. Note that erosion rates in Table F-1 reflect sheet and rill erosion, not sediment delivered to the lake. Sheet and rill erosion rates in the Lake Anita watershed include erosion from grassland and pasture areas. The extreme slopes in the watershed create conditions which highly favor excessive erosion rates in the watershed.

Table F-2 compares the annual average TP export simulated by the Lake Anita STEPL model with past study results in other watersheds in Iowa with an emphasis on the Southern Iowa Drift Plain. TP exports in the Lake Anita watershed are 1.1 pounds per acre per year. However, this reduced rate takes BMPs throughout the watershed into account when calculating load reductions, which may not occur in other

watershed studies. Because the STEPL model predicted sediment and phosphorus loads similar in magnitude to estimates developed for other local and regional watersheds, Iowa DNR has determined the STEPL model to be adequate for estimation of phosphorus loads to Lake Anita for development of TMDLs and implementation planning.

**Table F-2. Comparison of TP Exports in Southern Iowa Drift Plain Watersheds.**

<b>Watershed Location</b>	<b>Source</b>	<b>TP Export (lbs/ac)</b>
Lake Iowa, Iowa County	Iowa DNR (Previous TMDL)	1.09
Windmill Lake, Taylor County	Iowa DNR (Previous TMDL)	1.5
Badger Creek Lake, Madison County	Iowa DNR (Previous TMDL)	2.2
Green Valley Lake, Adair County	Iowa DNR (Previous TMDL)	1.6
Thayer Lake, Union County	Iowa DNR (Previous TMDL)	2.1
Prairie Rose Lake	Iowa DNR (Previous TMDL)	0.89
Meadow Lake, Adair County	Iowa DNR (Previous TMDL)	0.97
Lake Ahquabi, Warren County	Iowa DNR (Previous TMDL)	1.5
<b>Lake Anita, Cass County</b>	<b>STEPL Model (Current TMDL)</b>	<b>1.1</b>

## F.2. BATHTUB Model Performance

Performance of the BATHTUB model was assessed by comparing predicted water quality with observed data collected in Lake Anita. Simulation of TP concentration and Secchi depth / chl-a (algae) were critical for TMDL development, and were the focus of calibration efforts.

### Calibration

Table F-3 reports observed and predicted annual average TP, chl-a, and Secchi depths in the open water area of Lake Anita, along with the dispersion model and calibration coefficients for each parameter of interest. More comprehensive observed data is reported in Appendix C. Predicted water quality is based on BATHTUB simulations, and the calibration coefficients were iteratively adjusted in order to obtain the best possible agreement between observed and predicted water quality, while minimizing changes in the default coefficients. The calibration period was 2006-2021, the assessment period.

Calibration coefficients listed alongside the simulated values in Table F-3 were entered in the “Segments” menu of the BATHTUB model, and apply to the ambient monitoring segment of Lake Anita. Calibration coefficients for Lake Anita are within the recommended range according to the BATHTUB user guidance (Walker, 1999).

Initial testing showed phosphorus levels from watershed loading were adequate for meeting observed water quality data in Lake Anita. Internal loading levels were not required and due to lake morphology not appropriate for Lake Anita (Filstrup 2016). Once simulated phosphorus levels were calibrated to observed phosphorus levels, other water quality measurements were calibrated by increasing or decreasing model coefficients within the BATHTUB model.

**Table F-3. Observed and Simulated Water Quality with Calibration Factors.**

Parameter	Observed <sup>(1)</sup>	Predicted <sup>(2)</sup>	Calibration Coefficient <sup>(3)</sup>
<b>Modeling period and TMDL conditions (2006-2021)</b>			
Total Phosphorus (µg/L)	63.9	44.6	0.776
Chlorophyll-a (µg/L)	35.0	27.1	1.134
Secchi depth (m)	0.7	0.8	1.789

(1) Average concentration observed at ambient monitoring location

(2) Average annual concentration predicted modeled segment of BATHTUB lake model

(3) Calibration Coefficient at ambient monitoring location.

### F.3. References

U.S. Geological Survey (USGS), 2001. Water Quality Assessment of the Eastern Iowa Basins – Nitrogen, Phosphorus, Suspended Sediment, and Organic Carbon in Surface

Walker, W. 1996 (Updated 1999). Simplified Procedures for Eutrophication Assessment and Prediction: User Manual. US Army Corps of Engineers Waterways Experiment Station. Instruction Report W-96-2.

## Appendix G. Expressing Average Loads as Daily Maximums

In November of 2006, The U.S. Environmental Protection Agency (EPA) issued a memorandum entitled *Establishing TMDL "Daily" Loads in Light of the Decision by the U.S. Court of Appeals for the D.C. circuit in Friends of the Earth, Inc. v. EPA, et al., No. 05-5015, (April 25, 2006) and Implications for NPDES Permits*. In the context of the memorandum, EPA

*"...recommends that all TMDLs and associated load allocations and wasteload allocations include a daily time increments. In addition, TMDL submissions may include alternative, non-daily pollutant load expressions in order to facilitate implementation of the applicable water quality standards..."*

Per the EPA requirements, the loading capacity of Lake Anita for TP is expressed as both a maximum annual average and a daily maximum load. The annual average load is more applicable to the assessment of in-lake water quality and water quality improvement actions, whereas the daily maximum load expression satisfies the legal uncertainty addressed in the EPA memorandum. The allowable annual average was derived using the BATHTUB model described in Appendix E, and is 1,225.1 lbs/year.

The maximum daily load was estimated from the allowable growing season average using a statistical approach. The methodology for this approach is taken directly from the follow-up guidance document titled *Options for Expressing Daily Loads in TMDLs* (EPA, 2007), which was issued shortly after the November 2006 memorandum cited previously. This methodology can also be found in EPA's 1991 *Technical Support Document for Water Quality Based Toxics Control*.

The *Options for Expressing Daily Loads in TMDLs* document presents a similar case study in which a statistical approach is considered the best option for identifying a maximum daily load (MDL) that corresponds to the allowable average load. The method calculates the daily maximum based on a long-term average and considers variation. This method is represented by the equation:

$$MDL = LTA \times e^{[z\sigma - 0.5\sigma^2]}$$

Where:

MDL	=	maximum daily limit
LTA	=	long term average
z	=	z statistic of the probability of occurrence
$\sigma^2$	=	$\ln(CV^2 + 1)$
CV	=	coefficient of variation

The allowable annual average of 1,225.1 lbs/year is equivalent to a long-term average (LTA) daily of 3.4 lbs/day. The LTA is the allowable annual load divided by the 365-day averaging period. The average annual allowable load must be converted to a MDL. The 365-day averaging period equates to a recurrence interval of 99.7 percent and corresponding z statistic of 2.326, as reported in Table G-1. The coefficient of variation (CV) is the ratio of the standard deviation to the mean. However, there is insufficient data to calculate a CV as it relates to TP loads to the lake, because the models are based on annual averages over several years. In cases where data necessary for calculating a CV is lacking, EPA recommends using a CV of 0.6 (EPA, 1991). The resulting  $\sigma^2$  value is 0.31. This yields a TMDL of 10.5 lbs/day. The TMDL calculation is summarized in Table G-2. An explicit MOS of 10 percent (1.1 lbs) was applied, resulting in a daily LA of 9.4 lbs/day to the daily equation daily TMDL equations. The resulting TMDL, expressed as a daily maximum, is:



**TMDL = LC =  $\Sigma$  WLA (0 lbs-TP/day) +  $\Sigma$  LA (9.4 lbs-TP/day) + MOS (1.1 lbs-TP/day) = 10.5 lbs-TP/day**

**Table G-1. Multipliers Used to Convert an LTA to an MDL.**

Parameter	TMDL	$\Sigma$ WLA	$\Sigma$ LA	MOS
LTA (lbs/day)	3.4	0.00	3.1	0.3
Z Statistic	2.326	2.326	2.326	2.326
CV	0.6	0.6	0.6	0.6
$\sigma^2$	0.31	0.31	0.31	0.31
<b>MDL (lbs/day)</b>	<b>10.5</b>	<b>0.00</b>	<b>9.4</b>	<b>1.1</b>

**Table G-2. Summary of LTA to MDL Calculation for the TMDL.**

Parameter	Value	Description
LTA	3.4 lbs/day	Annual TMDL (1,225.1 lbs) divided by 365 days
Z Statistic	2.326	Based on 180-day averaging period
CV	0.6	Used CV from annual GWLF TP loads
$\sigma^2$	0.31	$\ln(CV^2 + 1)$
<b>MDL</b>	<b>10.5 lbs/day</b>	<b>TMDL expressed as daily load</b>

## Appendix H. 2022 305(b) Water Quality Assessment

### H.1. Segment Summary

Lake Anita

Waterbody ID Code: IA 05-NSH-1435

Location: CASS COUNTY, S14, T75N, R24W, 4 MI SSW OF INDIANOLA.

<b>Assessment Cycle</b>	2022	<b>Overall IR Category</b>	5 – Water is impaired or threatened and a TMDL is needed.
<b>Release Status</b>	Final	<b>Trophic</b>	Eutrophic
<b>Result Period</b>	2016 -2020	<b>Trend</b>	Stable
<b>Created</b>	12/30/2021 3:47:41 PM	<b>Last Updated</b>	1/28/2022 8:52:59 AM

Class	Support	Causes of Impairment
Class A1 Recreation Primary Contact	Not Supported Algal Growth: Cyanobacteria	<b>Impairment Code</b> 5* - 303(d)-impaired last cycle; fully supporting this cycle; potential de-listing <b>Cause Magnitude</b> Moderate <b>Status</b> Continuing <b>Source</b> Natural: Internal Nutrient Recycling (Primarily Lakes) <b>Source Confidence</b> Moderate <b>Cycle Added</b> 2010 <b>Impairment Rationale</b> Narrative criteria violation: aesthetically objectionable conditions <b>Data Source</b> Ambient monitoring: Iowa DNR-lakes <b>TMDL Priority</b> Tier I
Class B(LW) Aquatic Life Lakes and Wetlands	Fully Supported	
Class HH Human Health	Fully Supported	

### H.2. Assessment Summary

The Class A1 use was assessed (monitored) as “not supported” due to algae blooms that violated Iowa's narrative criteria protecting against aesthetically objectionable conditions. The Class BLW use was assessed (monitored) as “fully supported.” Class HH use was assessed (monitored) as “fully supported” based on fish tissue sampling data.

### H.3. Assessment Explanation

**Table H-1. Sources of Data.**

Data Source	Data Source ID	Data Type	Data Age	Site ID	Site Name	Site Description
Iowa DNR	6	WQ	CY 2018-2020	21150001	Lake Anita Beach (Lake Anita State Park)	
Iowa DNR	6	WQ	CY 2016-2020	22150002	Lake Anita	
Iowa DNR		FT	See Below	100	Lake Anita	SW of Anita

**Table H-2. Class A1 - Indicator Bacteria.**

Site ID	Data Source ID	# Samples / # Years	2018 Geometric Mean	2019 Geometric Mean	2020 Geometric Mean	Annual Geometric Mean Violation	# 2018 SSM Violations	# 2019 SSM Violations	# 2020 SSM Violations	Violates Annual SSM significantly ? 10% Rule	Assessment Type	Support Level
21150001	6	14/15/13	25	23	33	NO	1/4	0/4	0/4	NO	Monitored	Full
22150002	6	3/3/3	1	5	10	NO	0 / NA	0/ NA	0 / NA	NO	Evaluated	Full

**Table H-3. Class A1 – pH.**

Site ID	Data Source ID	# Samples / # Years	Maximum Value	Mean Value	Median Value	# Violations	Violations Needed for Impairment	Significantly >10% Violations	Assessment Type	Support Level
22150002	6	15 / 5	7.7	8.8	8.3	0	4	NO	Monitored	Full

**Table H-4. Class A1 - Lake TSI's.**

Site ID	Data Source ID	Parameter Name	# Samples / # Years	Minimum Value	Maximum Value	Median Value	Median TSI Violation	Assessment Type	Support Level
22150002	6	Chlorophyll a TSI	15 / 5	26	74	60	NO	Monitored	Full
22150002	6	Secchi TSI	15 / 5/	52	73	67	YES	Monitored	Not
22150002	6	Total P TSI	15 / 5	37	733	61	NA	NA	NA
2215002	6	Inorganic suspended solids	15 / 5	0.3	30	2	NA	NA	NA

- Although the index value for Chlorophyll a was below the impairment trigger of 65 for this assessment cycle, the Class A1 use of Lake Anita remains “not supported” due to aesthetically objectionable conditions. Based on DNR’s methodology, the median TSI value for Chlorophyll a must be 63 or less for two consecutive assessment/listing cycles before a lake can be removed from the state’s Section 303(d) list ((IR) Category 5). Therefore, Lake Anita will remain listed as “not supported for the 2022 assessment/listing cycle.
- The level of inorganic suspended solids was relatively low at Lake Anita, and does not suggest water quality problems due to non-algal turbidity.

**Table H-5. Class BLW - Conventional Parameters.**

Site ID	Data Source ID	Parameter Name	# Samples / # Years	Maximum Value	Mean Value	Median Value	# Violations	# Acute/ Chronic Violations	Violations needed for impairment	Significantly >10% Violations	Assessment Type	Support Level
22150002	6	Ammonia	15 / 5	0.001	0.335	0.06	NA	0 / 0	4	NO	Monitored	Full
22150002	6	Dissolved oxygen	15 / 5	4.9	11.6	7.9	1	NA / NA	4	NO	Monitored	Full
22150002	6	pH	15 / 5	7.7	8.8	8.3	0	NA / NA	4	NO	Monitored	Full
22150002	6	Temperature	15 / 5	18.2	28.5	24.5	0	NA / NA	4	NO	Monitored	Full

**Table H-6. Class BLW - Lake Planktonic Cyanobacteria.**

Site ID	Data Source ID	# Samples	Maximum Cyanobacteria Wet Mass	Maximum Cyanobacteria % Composition	Median Cyanobacteria Wet Mass	Median Cyanobacteria % Composition	Median Cyanobacteria Wet Mass = 75th Percentile	Assessment Type	Support Level
22150002	6	6	80.03	98.4	7.34	78.4	no	Evaluated	NA

**Table H-7. Class HH - Fish Tissue Sampling.**

Site ID	Biopart	Year	Species Name	# in sample / # of samples	Avg Length (cm)	Avg Hg (ppm)	Chlordane (ppm)	Sum PCBs (ppm)
100	plug	2019	black crappie	2	18.9	0.067		
100	plug	2019	crappie spp.	8	27.5	0.167		
100	plug	2019	largemouth bass	10	34.6	0.196		
Support Level	Full							

#### H.4. Monitoring and Methods

##### Assessment Key Dates

6/14/2016	Non-fixed Monitoring Start Date
9/23/2020	Non-fixed Monitoring End Date
7/1/2019	Fish Tissue Monitoring
7/1/2020	Fish Tissue Monitoring

##### Methods

120	Surveys of fish and game biologists/other professionals
222	Non-fixed-station monitoring (conventional during key seasons and flows)
260	Fish tissue analysis
340	Primary producer surveys (phytoplankton/periphyton/macrophyton)
420	Water column surveys (e.g. fecal coliform)

## Appendix I. DNR Project Files and Locations

This appendix is primarily for future reference by DNR staff that may wish to access the original spreadsheets, models, maps, figures, and other files utilized in the development of the TMDL.

**Table I-1. Project Files and Locations.**

Directory\folder path	File name	Description
\\iowa.gov.state.ia.us\...\Lake_Anita\Data\Raw	Various files	All raw data received from others
\\iowa.gov.state.ia.us\...\Lake_Ahquabi\Data\Reduced	LANI_WQ_Dataset_RevEquations 04-07-22-r1.xlsx	Summary of in-lake WQ data
\\iowa.gov.state.ia.us\...\Lake_Anita\Data\Reduced\Weather	LANI_Evap-Precip_Data_Rev 04-07-22_r1.xlsx	Summary of precipitation and PET data
\\iowa.gov.state.ia.us\...\Lake_Anita\Documents, Presentations\Draft TMDL	Draft TMDL reports	Includes review comments
\\iowa.gov.state.ia.us\...\Lake_Anita\Documents, Presentations\Final TMDL	Final report	Report for submittal to EPA
\\iowa.gov.state.ia.us\...\Lake_Anita\Documents, Presentations\References	Various .pdf and .doc files	References cited in the WQIP and/or utilized to develop model input parameters
\\iowa.gov.state.ia.us\...\Lake_Anita\GIS\GIS_Data	Various shapefiles (.shp) and raster files (.grd)	Used to develop models and maps
\\iowa.gov.state.ia.us\...\Lake_Anita\GIS\Projects	ArcGIS project files	Used to develop models and maps
\\iowa.gov.state.ia.us\...\Lake_Anita\GIS\Maps	Various .pdf and .jpg files	Maps/figures used in the WQIP document
\\iowa.gov.state.ia.us\...\Lake_Anita\Modeling	LANI_STEPL_Model_Input_Data.xlsx.	Input data for STEPL
\\iowa.gov.state.ia.us\...\Lake_Anita\Modeling	TMDL_Equation_Calcs_LANI_LANI 04-07-22_r1.xlsx	Used to develop the TMDL equation (LA, WLA, and MOS)
\\iowa.gov.state.ia.us\...\Lake_Anita\Modeling\STEPL	LANI_STEPL_Model 04-07-22.xlsm_r1	Used to simulate/predict existing watershed loads
	Various .xlsx files	Used to develop/calculate STEPL model inputs

\\iowa.gov.state.ia.us\...\Lake_Anita \Modeling \BATHTUB	BATHTUB_input_LANI 04-07-22.xlsx	Calculated/converted STEPL outputs to BATHTUB inputs for existing conditions
	Various .btb files	BATHTUB input files for various scenarios
\\iowa.gov.state.ia.us\...\Lake_Anita \Modeling \BATHTUB	LANI_TMDL 04-07-22.btb	BATHTUB model for Lake Anita

## **Appendix J. Public Comments**

*Public Comment:*

The Iowa DNR received no public comments on the Lake Anita TMDL.