

Comment received during the hearing:

Comment 1.

NDEP should put more emphasis on water quality issues related to climate change. Your sampling plans should make sure you are collecting the right data to evaluate future climate change issues.

NDEP Response: Climate change is something that continually confronts our water quality planning program. As technology allowed, NDEP initiated continuous monitoring/logging of stream temperature in numerous streams throughout Nevada. We have been collecting continuous data at 1-hour intervals for many years now and plan to continue this program.

Comments received from Zack Blumberg, Stormwater Planning Supervisor, Nevada Department of Transportation:

Comment 1.

I support NDEP's decision to change the beryllium criterion from 0 µg/L. It makes no sense to include waterbodies on the 303(d) list that have concentrations below the current drinking water standard (4 µg/L). Removing impairments from the 303(d) list that are based on concentrations less than the drinking water standard will help permittees by allowing them to focus on real impairments. While it is a step in the right direction, I believe that the current drinking water standard (4 µg/L) is still too stringent. Only a handful of surface waters throughout the state are sources of public drinking water. Furthermore, the criteria to protect the municipal or domestic supply beneficial are meant to be set at level where the waterbody can be treated by conventional methods of water treatment to comply with Nevada's drinking water standards. Therefore, I encourage NDEP use a criterion that is less stringent than the current drinking water standard for beryllium (4 µg/L). It sure would be great to live in a world where all surface waters met drinking water standards though!

NDEP Response: Review of existing data shows that 100% of waters currently listed for beryllium under the standard of 0 µg/L would not be listed if the standard was revised to 4 µg/L. The Continuing Planning Process (CPP, 2004) specifically states that drinking water standards will be used for waters with the beneficial use of municipal or domestic supply (MDS). NDEP notes that beryllium criteria for protection of aquatic life are greater than 4 µg/L; however, NDEP could only set those less restrictive standards for waters that do not have MDS use.

Comment 2.

I encourage NDEP to add an evaluation step for natural background concentrations to Nevada's assessment methodology for future Integrated Reports. Removing impairments from the 303(d) list that are due to natural background concentrations would help permittees by allowing them to focus on impairments that can be addressed by implementing best management practices.

NDEP Response: We have drafted a performance-based approach for assessing natural background conditions but have not yet fully approached EPA with it. We plan to incorporate the performance-based approach in the future, pending EPA approval.

Comment 3.

During the Triennial Review meeting, NDEP stated that long-term sites are only sampled once per year by the agency. Many of these waterbodies have seasonal water quality criteria (e.g. water temperature and dissolved oxygen). If only one sample or field measurement is collected per year, how will NDEP assess this limited data in future Integrated Reports? In addition to seasonal criteria, many waterbodies have criteria that are based on annual averages. If only one sample or field measurement is collected per year, how will NDEP assess this limited data in future Integrated Reports? I encourage NDEP to deploy continuous monitoring sensors at as many locations as possible to help fill in the data gaps resulting from only sampling once per year.

NDEP Response: NDEP reworked its sampling plan to monitor the long-term sites once per year due to increasing laboratory costs. Additionally, the large Central Region being the current focus basin is accounting for a large share of monitoring resources. The temperature and DO standards you specifically mention can be dealt with placement of automatic data loggers to track those parameters on an hourly basis. We have numerous temperature dataloggers in streams currently collecting data. We can also employ DO loggers in a similar manner. BWQP will evaluate its monitoring program annually and modify sampling schedules to allocate resources where needed to ensure adequate data collection.

Comment 4.

During the Triennial Review meeting, NDEP stated that the agency has conducted bioassessments for 21 years and needs to enhance how it is using this data. I agree with this statement and encourage NDEP to move forward on using bioassessment data as a first line of evidence for assessing waterbodies in future Integrated Reports. Water column chemistry samples are snapshots in time that only indicate what the water quality conditions are at that particular moment. Bioassessment data is a much better indicator of long-term water quality conditions.

NDEP Response: NDEP is in the process of expanding our database infrastructure to house and evaluate the bioassessment data and are hopeful to use bioassessment data as a secondary line of evidence in the future.

Comment 5.

Harmful Algal Blooms were discussed during the Triennial Review meeting. I highly encourage NDEP to develop and maintain a HAB Incident Reports Map similar to the HAB Incident Reports Map maintained by the California State Water Resources Control Board. In addition, a periodic report of HABs throughout the state could be emailed to a listserv.

NDEP Response: The standards and monitoring branch recognizes the importance of HABs in Nevada and plans to continue expanding HAB monitoring and reporting activities as our limited resources allow.

Comment 6.

I also encourage NDEP to publish an updated Water Quality Trend Analyses for Selected Nevada Streams report. As far as I know, this trend report has not been updated since June 2016.

NDEP Response: Our staffing and resources are limited, and higher priority projects are currently taking precedence. Updating the Water Quality Trend Analysis is on our list of tasks to accomplish. However, as discussed in the Triennial Review, there are several higher priority projects we aim to accomplish first.