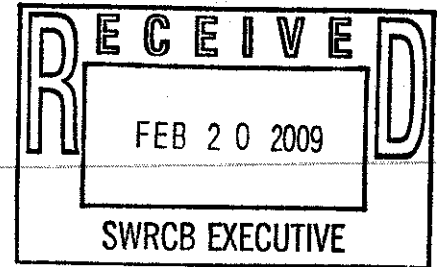


commentletters - Comment Letter-Revised Standards for Antelope HU

From: <Judy_Hohman@fws.gov>
To: <commentletters@waterboards.ca.gov>
Date: Friday, February 20, 2009 9:15 AM
Subject: Comment Letter-Revised Standards for Antelope HU



Gentlemen:

Thank you for the opportunity to comment on the proposed amendment to revise standards for surface waters of the Antelope Hydrologic Unit. These comments specifically address the Amargosa Creek and Piute Ponds surface waters.

Regarding changes to beneficial uses: We support the amendment to add Rare, Threatened, and Endangered Species Habitat (RARE) and Preservation of Biological Habitats of Special Significance (BIOL) as beneficial uses of Piute Ponds and Piute Ponds wetlands, and Freshwater Replenishment Use (FRSH) for the lower segments of Amargosa Creek. We ask the State Board consider retaining Water Contact Recreation (REC-1) as a beneficial use; Piute Ponds is used by duck hunters who frequently enter the water to hunt.

Regarding water quality objectives for Piute Ponds and Piute Ponds wetlands: We ask the State Board to consider different standards for assessing nitrogen levels. Rather than using ammonia, we recommend assessing water quality objectives using total nitrogen load. This approach considers ammonia and other forms of nitrogen that are present in the surface waters. Ammonia may be present within acceptable levels but the total nitrogen load may be toxic to wildlife species and/or the trophic levels upon which they depend in the food chain/web.

We acknowledge that our recommendations may not apply under this amendment process, but may be appropriate for future consideration under a different process. If so, we support the proposed amendment and ask that we be included in any future considerations of beneficial uses and water quality objectives regarding nitrogen.

Thank you for considering RARE and BIOL as beneficial uses for these surface waters and recognizing the importance of fish, wildlife, and plants as public resources with management needs. If you have any questions, please contact me via email at judy_hohman@fws.gov or at the address below.

Judy Hohman

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