



April 17, 2020

Brenda Hunt, Carson River Watershed Program Manager
Carson Water Subconservancy District
777 E. William Street, Suite #110A
Carson City, NV 89701

Subject: Responses to Comments on the Draft Nevada 2016-2018 Integrated Report

Dear Ms. Hunt:

The Nevada Division of Environmental Protection (NDEP) Bureau of Water Quality Planning (BWQP) received comments made on the Draft Nevada 2016-2018 Water Quality Integrated Report (2018 IR). BWQP is committed to improving the accuracy of the Water Quality Integrated Report and appreciates your careful review.

BWQP has reviewed the areas of concern brought to our attention and have addressed them below. All changes noted below have been made to the final version of the report.

Page ES-9: Outlook on Nevada's Surface Waters:

This paragraph should be more positively written. Currently it is very negatively written and comes off almost as a fait accompli or a done deal. What is NV doing to provide additional funding, staffing, resources? Has additional funding ever been asked for outside of the EPA funds provided? There are areas where interagency and local stakeholders are working together to help improve water quality, for example in the Carson River Watershed. This section needs to be more positive and discuss what good is happening, where it is happening, and a path toward it happening across the state. Perhaps a more positive discussion could lead to additional funds and staffing because if you say it will never happen than it never will.

BWQP Response: The text has been expanded to cover the work being done by other entities through the nonpoint source program.

Page 3 – Section 2.1 Topography and Hydrogeography:

This seems like a good spot to discuss that some of these hydrographic areas and basins that cross state lines as Figure 1 does not show the other states and does not obviously indicate boundary crossings.

BWQP Response: There are only two basins (West Central and Humboldt) that are bounded entirely within Nevada. The text has been expanded as you suggest.

Page 5 – Section 2.3 Surface Water:

In the Carson, DRI studies indicate snow melt and runoff is occurring earlier due to climate change; therefore April and May may be more appropriate months to list here, especially in the northern portions of NV. USGS water data appears to indicate this as well. Mentioning climate change science in this section seems appropriate, as it is also causing reductions to flow.

BWQP Response: Text has been added on the potential effects of climate change.

Page 9 – Section 3.3 Management Program for Nonpoint-Source Pollution:

Reading through this section and the next few, the report does not discuss that there are three EPA accepted Watershed Plans in NV that do work toward water quality improvements in those particular watersheds, Carson, Lake Tahoe, and Las Vegas Wash. Where will these be discussed as they are a positive force in helping with NPS and WQ Programs? CWSD is working with our Carson River Coalition partners doing multiple projects and we know that the broad data monitoring may not show a marked improvement, but with continued actions, CWSD is hopeful that we will improve WQ in the long run. It seems appropriate for NDEP to discuss the positive actions that are happening and the Clean Water Section 319(h) funding that is helping in these particular watersheds and several others despite not having a watershed plan. The Truckee is working on a plan, which could also be mentioned. Again, people ARE doing things and in our mind, it is important to recognize the efforts that are being made to help improve these impaired waters.

For Example: In looking at your data, the reach of the CR that goes through Carson City has been removed from the 303(d) list for Temperature and Dissolved Oxygen. It seems that potential reasons for this may be that there has been a concerted effort by Carson City to place large portions of the river into Open Space. There has been weed management, protection and enhancement of riparian vegetation, etc. We should be celebrating these achievements!

BWQP Response: The text has been significantly expanded to cover the work being done by other entities through the Nonpoint Source Program.

Page 10 – Section 3.4 Water Pollution Control Revolving Fund:

Similarly, to the comments above, what types of projects and their locations have been funded? Is it possible to have a map and a list of projects and percent of funding over the life of this report? It would again highlight that the State and their partners are working on these issues.

BWQP Response: Text has been added to note that, since about 1990, approximately \$516 million dollars has been spent on projects to improve water reclamation facilities across Nevada. More information on specific projects is available at: <https://ndep.nv.gov/water/financing-infrastructure/state-revolving-fund-loans/clean-water-wastewater>

Page 11 – Section 3.5 Total Maximum Daily Load Program:

At this time, NDEP has not identified stakeholder interest in developing new TMDLs and management plans for nonpoint sources. Without stakeholder involvement, such a TMDL cannot be effectively implemented. However, NDEP continues to search for potential partners to develop TMDLs or other alternative measures.

Comment based on above para: There is a Watershed Plan being developed for a portion of the Truckee River, so saying there are not stakeholders involved seems incorrect. We understand

BWQP Response: This section has been revised to include more up-to-date information and describe existing watershed plans and affiliated organizations.

In relation to Alternatives to TMDL's/Vision Programs:

Will Vision Plans (alternate TMDLs) be the way NV moves forward? What has been contemplated since the new framework was introduced by EPA? Are there examples, e.g. the Truckee? Lahontan Regional Water Quality Control Board has decided to use this approach on the West Fork of the Carson River in California. They are just beginning the process. As Nevada continues to contemplate the appropriate means to implement the recommendations, it may be worthwhile looking as to how other states are doing the same.

BWQP Response: Comment noted. BWQP is currently updating the Vision framework for Nevada.

Page 20 – Section 4.5.2 Changes in Assessment Methodology:

What are the delisting standards sets, and are the 34 unique standards that were added to the "Less Restrictive Uses" standard group in the tables? Can you reference them or provide them in the appendices?

BWQP Response: The "Consistency Petition" (R109-16) removed redundant asterisks from the Standards of Water Quality in NAC 445A.1252-2214 showing only the most restrictive use for each parameter. We had to create these unique standard sets, specific to the 2018 IR, to deal with the parameter/beneficial use no longer applicable.

Page 35 – Section 5.1 Total Maximum Daily Loads:

Similar comment to Pages ES-9, Pages 9-11.

BWQP Response: Comment noted. See responses to similar comments.

If you have any questions, please do not hesitate to contact me at (775) 687-9548.

Sincerely,



Dave Simpson, Supervisor
Water Quality Standards and Monitoring
Bureau of Water Quality Planning

cc: Greg Lovato, Administrator, NDEP
Jennifer Carr, P.E., CPM, CEM, Deputy Administrator, NDEP
Paul Comba, Chief, Bureau of Water Quality Planning, NDEP