



April 6, 2020

Becky Kurtz
Environmental Division
Naval Air Station, Fallon
4755 Pasture Rd BG 307,
Fallon, NV 89496

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

Dear Ms. Kurtz:

The Nevada Division of Environmental Protection (NDEP) Bureau of Water Quality Planning (BWQP) received comments made by Naval Air Station, Fallon on the Draft Nevada 2016-2018 Water Quality Integrated Report. 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 have been incorporated into the final 2016-2018 Integrated Report (2016-2018 IR).

NAS Fallon Comment:

I was reviewing the draft WQS and wanted to make sure that I am seeing correctly that the diagonal drain does not have WQS parameters anymore? The 13.4 mile stretch that is the diagonal drain does not seem to be listed anywhere except the section which states phosphorus is delisted for the diagonal. The 2014 WQS parameters included arsenic, boron, iron, mercury in tissue and sediment phosphorus and TDS for the diagonal drain. The diagonal drain and these parameters are not in the draft 2016-18 WQS report.

If it has been removed, is section 4.5.2 "Changes in Assessment Methodology" the reason? If so, will previous listings be listed for clarification that they have been removed?

BWQP Response: Initially, BWQP followed a jurisdictional determination by the Army Corps of Engineers (Corps) that appeared to state that all waters below the Diversion Dam below Lake Lahontan were not "waters of the US" and therefore are not covered under the Clean Water Act. NDEP sought clarification from the U.S. Environmental Protection Agency (EPA) on this ambiguous determination by the Corps. Based on EPA's determination, all waters below Lake Lahontan that had been

exempted by the Corps were added back into the 2016-2018 IR. Diagonal Drain (NAC 445A.1854) and V-Line Canal (NAC 445A.1846) remain subject to the Clean Water Act regulation and have been reinstated into the 2016-2018 IR.

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