



April 17, 2020

Michael Pook
Stormwater Planning
Nevada Department of Transportation
1263 South Stewart Street
Carson City, Nevada 89712

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

Dear Mr. Pook:

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. 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 to the final version of the report.

Page/ Paragraph/Sentence Comment

ES-3/ 1/2. Category 5 is in parenthesis after 'impaired waters'. Change to Category 4a and 5 to denote that category 4a waters are also impaired.

BWQP Response: Only Category 5 waters are considered impaired for listing purposes. Category 4a waters have a TMDL to address all impairments on the water, which removes the water from the 303d impaired water listing. A waterbody that has a TMDL but is also impaired for a different parameter without a TMDL, is considered Category 5 and will appear on the 303d list. Assessment categories are more thoroughly described in section 4.5.3 "Assessment Categories Used in the 2016-2018 Assessment".

ES-5/ Table/ES-1. I would not include the units after the Parameter as this table is simply showing the number of impairments for each parameter.

BWQP Response: The table has been revised and simplified to be clearer.

ES-5/ Table ES-1. How is Parameter and Analyte different in this Table?

BWQP Response: The parameter and analyte reference our database terminology. The table has been modified to minimize confusion.

ES-5/ Table ES-1. Delete 'Analysis' before Total Dissolved Solids, pH, Dissolved Oxygen, Nitrate Nitrite, and Sodium Absorption Ratio

BWQP Response: As noted above, the table has been modified to minimize confusion.

ES-5/ Table ES-1 footnote. Why are TMDLs excluded and not considered impaired?

BWQP Response: This is a result of how the EPA has established Clean Water Act reporting. A water that is classified as "Category 5" is impaired and requires a plan (TMDL or alternative) to improve water quality. A water classified as "Category 4a" may not be meeting standards, but an approved plan is in place to improve water quality.

ES-8/ 4/4. Protecting isn't the correct word here. Just assigning a TMDL does not protect a beneficial use.

BWQP Response: Comment noted. The goal of enacting a TMDL is to improve water quality in order to protect the beneficial use(s). Although you are correct in that simply creating a TMDL does not protect beneficial uses, the TMDL or Watershed Management Plan is one mechanism through which water quality may be improved and beneficial uses protected.

ES-9/ Figure ES-3. Protecting isn't the correct word here. Just assigning a TMDL does not protect a beneficial use.

BWQP Response: Comment noted. The goal of enacting a TMDL is to improve water quality in order to protect the beneficial use(s). Although you are correct in that simply creating a TMDL does not protect beneficial uses, the TMDL or Watershed Management Plan is one mechanism through which water quality may be improved and beneficial uses protected.

ES-9/ Table ES-3. Including the unsupported beneficial use/s for those examples would be useful as that is what is driving TMDL creation.

BWQP Response: Some TMDLs can have multiple uses which made the table confusing and too busy. We will look at revising the table for future integrated reports.

5/ Table 1. Delete 'Miles of' and 'Number of' from within the 'Type of Waterbody' column

BWQP Response: Text in the table has been revised.

16/ 1/2. delete first 'of'

BWQP Response: Typographic error fixed.

18/ 1/1. replace 'protect' with 'evaluate'

BWQP Response: Comment noted. Water quality criteria are established to be protective of specific beneficial uses.

35/ 3/4. delete 'only'

BWQP Response: Text revised.

Attachment 1. How is a 'Continues to be Listed' designation a change from the 2014 Cycle? Perhaps retitling the heading to 'Status Update' and adding a footnote that blank indicates Category 1-3 waters may be clearer?

BWQP Response: The title has been changed to "...Status Updates" and the header to "Comparison with 2014 Cycle."

Attachment 2. Please include a footnote that appears on each page of the Attachment a decoder key for the F; I; N; X, so that the reader does not have to scroll through 12 pages to decipher.

BWQP Response: We have modified the table to include a footnote on each page.

Thank you for your careful review and thorough 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