



April 6, 2020

Zack Blumberg
Stormwater Planning Supervisor
Nevada Department of Transportation
777 E. William Street, Suite #110A
Carson City, NV 89701

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

Dear Mr. Blumberg:

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 report and appreciates your careful review.

BWQP has reviewed your comments and has addressed them below.

Page ES-3. Figure ES-2 should also include the hydrographic region numbers 1-14 (in addition to the hydrographic region names). It is unclear what the colors (blue, green, yellow, and purple) indicate in Figure ES-2. Definitions of what each color indicates should be added to the Key. If the colors don't have meaning, then the color scheme should match Figure 1 on Page 4.

BWQP Response: This figure has been modified to be clearer. This change, and all others, will be reflected in the revised final version of the 2016-2018 Water Quality Integrated Report

Page ES-4. According to convention, the names of all bacterial taxa should be italicized when written. Therefore, *Escherichia (E.) coli* should be italicized.

BWQP Response: This error has been corrected.

Page ES-5. Table ES-1 lists "Analysis Temperature" as a parameter causing impairments. Hopefully waterbodies are not being placed on the 303(d) List based on the temperature of the water quality sample measured by the analytical laboratory. Also some parameters in this table have units attached to them and some do not.

BWQP Response: Lab temperature is never used to evaluate temperature criteria for a waterbody. The word “analysis temperature” reflects the name of the parameter in the BWQP database. This means that the data may be from discrete or continuous measurement of temperature. There is an algorithm that selects the preferred data to use in the assessment because there may be multiple sources of in-situ temperature measurements for the same waterbody (i.e., continuous data or discrete samples).

The table has been modified to minimize confusion.

Page ES-7. Sometimes beneficial use names are italicized and sometimes they are not, and it is unclear why.

BWQP Response: This error has been corrected.

Page ES-7. “Rather meeting water quality standards for municipal or domestic supply ensures that a water can be made potable through treatment.” I recommend changing this to state: a water can be treated by conventional methods of water treatment in order to comply with Nevada’s drinking water standards.

BWQP Response: This text has been modified as suggested.

Page ES-9. Table ES-3 is somewhat misleading. I know that it is titled "Examples of some of Nevada's EPA-approved TMDLs" but a person glancing at it might mistake this for a complete list of EPA-approved TMDLs in Nevada.

BWQP Response: The table title has been modified to direct the reader to Attachment 5 for a listing of all TMDLs.

Page 3. NAC 445A.1242 lists all 14 as hydrographic regions (i.e. not basins).

BWQP Response: Text and Figure 1 have been amended to reflect the Hydrographic Regions as described in NAC 445A.1242.

Comment. NAC 445A.1242 also lists Region No. as 1, 2, 3, etc. Not NV01, NV02, NV03, etc. I recommend matching the NAC in the Integrated Report.

BWQP Response: Comment noted.

Page 4. Figure 1 should also include the numbers of the hydrographic regions (1-14).

BWQP Response: Figure has been modified to include region numbers.

Page 7. “Beneficial uses include, but are not limited to, contact recreation, irrigation, aquatic life, watering of livestock, and drinking water supply.” I recommend changing drinking water supply to “municipal or domestic supply” to match the NAC.

BWQP Response: The text has been modified as suggested.

Page 7. “In many cases, river or stream systems consist of two or more reaches, which may have different beneficial uses and different numeric criteria. Reaches are established at specific control points, pursuant to NAC 445A.1239.” Referred to in the NAC as segments not reaches. For example, This segment of Bilk Creek is located in Humboldt County. I recommend referring to portions of a river or stream system as a segment not a reach to match the NAC (Section 4.5.1 refers to divisions of waterbodies as segments.).

BWQP Response: The text has been modified to more closely align with the NAC.

Attachments. I recommend including the name of the hydrographic region (e.g. Northwest Region) in addition to the number of the hydrographic region in the Attachment tables.

BWQP Response: Comment noted. “Basin” has been changed to “Region” in the Attachment tables.

Attachment 4. Attachment 4 indicates that Washoe Lakes (NV06-SC-C_00) are being delisted for Total Phosphorus. Washoe Lakes were not listed for Total Phosphorus in the Nevada 2014 Integrated Report. The only impairment for Washoe Lakes was Mercury in Fish Tissue.

BWQP Response: Washoe Lakes (NV06-SC-40-C_00) was listed in Attachment 4 in error. Washoe Lakes were not listed for Total Phosphorous on the 2014 Integrated Report. 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. Washoe Lakes appearing delisted for Total Phosphorous is a relic of this change. This error has been corrected. This change will be reflected in the final version of the report.

Attachment 4. This only indication of what hydrographic region these waterbodies are located in is hidden within the waterbody code. I would recommend specifically stating the hydrographic region in this table.

BWQP Response: A footnote has been added defining the regions.

Attachment 5. This only indication of what hydrographic region the TMDL is located in is hidden within the waterbody code. I would recommend specifically stating the hydrographic region for each TMDL.

BWQP Response: A footnote has been added defining the regions

January 28, 2020. Here are some additional comments on the Draft Nevada 2016-2018 Water Quality Integrated Report:

Attachment 1. The table states Lagomarsino Creek is “Newly Listed Waterbody in 2016-2018”. However, Lagomarsino Creek was on the 2014 303(d) List for Iron.

BWQP Response: This error has been corrected.

Attachment 3. Washoe Lakes are listed for Iron 96-hr, Phosphorus total SV AQL, and TDS SV MDS. The table indicates that these are NOT New Listings. However, Washoe Lakes were only listed for Mercury in Fish Tissue in the 2014 Integrated Report.

BWQP Response: This error has been corrected. Washoe Lakes has new listings for the mentioned parameters. Also, see the response to “RE: Attachment 4 – Washoe Lakes” above.

Attachment 3. “Beneficial Use Codes: MDS = municipal and domestic supply.” NAC 445A.122 lists this beneficial use as Municipal or domestic supply. I recommend changing this to match the NAC.

BWQP Response: This error has been corrected.

Attachment 3. Below the Attachment 3 table acronyms are defined (e.g. DO = dissolved oxygen). However, there are several acronyms in the table that are not defined: AA, AGM, SV. I recommend either spelling these out in the table (e.g. Annual Average). If you don’t spell them out in the table, they should be defined below the table like the other acronyms.

BWQP Response: This error has been corrected. Acronyms used in this attachment will be defined in the footnote.

Attachment 3. Several waterbodies are listed as being impaired by “Mercury in sed”. I recommend not abbreviating sediment and list this impairment as “Mercury in Sediment”.

BWQP Response: This change has been made.

Attachments. Washoe Lakes are listed for Phosphorus total SV AQL in Attachment 3. However, Attachment 4 indicates that Washoe Lakes (NV06-SC-C_00) are being delisted for Phosphorus, Total mg/L.

BWQP Response: See the response to “RE: Attachment 4 – Washoe Lakes” above. This error has been corrected

Here are some comments on the webmap:

- The webmap is named: “DRAFT Nevada 2018 Integrated Report – This map was assembled to dispense information about the waterbodies and sample locations assessed in the Nevada 2018

Integrated Report.” The title of the draft IR is “Nevada 2016-2018 Water Quality Integrated Report”. I recommend matching the name of the webmap with the title of the IR.

- The linework in the Las Vegas valley does not match where the waterbodies are in reality (e.g. Duck Creek, Flamingo Wash, Las Vegas Wash, Pittman Wash, etc.). I request that the linework in the Las Vegas Valley gets cleaned up to match the actual flow paths of the waterbodies.
- The Carson River does not flow in Lahontan Reservoir in the webmap. The webmap includes linework for Carson River, Dayton Bridge to Weeks Bridge at US95. This linework should be for Carson River at Lahontan Reservoir (Carson River from the Dayton Bridge to Lahontan Reservoir NAC 445A.1822).

BWQP Response: These revisions will be made to the webmap. Changes will be reflected in the Final 2016-2018 Nevada Water Quality Integrated Report Webmap. However, the line work for the stream networks across Nevada reflect the National Hydrography Dataset (NHD) flowlines and may not be current to the channelization within the Las Vegas Valley. If NDOT has more recent stream/channel geometry, we would be amenable to using it instead of the NHD.

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