



Submitted via email to: Jennifer Carr
jcarr@ndep.nv.gov

February 26, 2020

Nevada Department of Environmental Protection
901 S. Stewart Street
Suite 4001
Carson City, NV 89701

RE: 2018 Integrated Report

Dear Jennifer,

Thank you for the opportunity to review and provide feedback on Nevada's 2018 Integrated Report. It is an impressive body of work that the Department has undertaken. The refined "WART" assessment tool and continued improvements to assessment and reporting shows our NDEP is progressing just as the quality of our waters are improving. The Department's extension of the comment period is greatly appreciated, and I hope our comments are determined to be useful.

Background

Trout Unlimited is a private non-profit national conservation organization that has more than 300,000 members and supporters nationwide dedicated to conserving, protecting and restoring North America's trout and salmon fisheries and their watersheds. Since 1959, TU has dedicated staff and volunteers working toward the protection of sensitive ecological systems necessary to support robust native and wild trout populations in their respective ranges. We recognize the value of public lands and the role public lands play in providing habitat to coldwater fisheries, drinking water, and wildlife habitat. Trout Unlimited believes the planning actions taken on public lands are ultimately reflected in the quality of fish and wildlife habitat and their populations.

In Nevada, TU plays a critical role in watershed conservation, restoration, and rehabilitation on public lands, particularly our forests. Staff and chapter members (the Sagebrush and Southern Nevada chapters) actively participate in projects with the Forest Service, communities and private landowners to maintain the important forest landscape vital to the social and economic community in this area.

We have organized our comments to address specific portions or aspects of the report.

NDEP Web Map

Trout Unlimited chooses to first comment on this most useful tool provided for all of us seeking information about the health of specific water bodies in the State. Thank you for providing this powerful look at Nevada's waters in a spatial format. I can't say enough how valuable this tool is.

Although a complete crosswalk was not completed to the delisted waterbodies, I did notice that the Knott Creek Reservoir (as an example) was still listed for pH. There were a few other streams that I was surprised were listed for pH. I am unsure if this and others should be delisted on the Mapping tool, per the change in Water Quality Standards.

Data collection and assessment

Trout Unlimited is acutely aware of the herculean task of trying to assess all water bodies in a state. As a cold-water fish nonprofit, we believe that the water bodies that have been identified as fishable waters should rise to a higher level of prioritization when decisions are made for which water bodies to sample in coming years. There are many data gaps in popular recreational waters that might be filled if an emphasis can be given to assess waters that are recreationally used and reaches that are accessible to most people. Perhaps the updating of the Nevada Quality Assurance Program Plan could include an emphasis on selection of recreationally used waters in the monitoring protocol.

We also acknowledge the tenuous times that the Department must wade through with changes to the definition of Waters of the US. We believe that waters of the State of Nevada deserve assessment and reporting on to Nevadans regardless of the WOTUS definition.

Reference Reaches and Category 1 Waters

Trout Unlimited appreciated the noted “Reference Waters” that NDEP have found during assessment. These stream reaches would be a welcome addition to the report by including them in the Mapping tool. Additionally, the Category 1 waters could have a section so that interested parties could use this data when special protections are being considered.

Formatting of the Report

I found the report generally put together and a very user-friendly fashion. We offer one small detail that would help the “layman” navigating the tables in the Attachments. If the Notes” could be included on the bottom of every page (in the footer perhaps).

Conclusion

The NDEP’s Integrated Report is an extremely useful tool for anyone interested in the quality of Nevada’s water. The addition of the Web Mapping makes researching singular water bodies much easier.

As the NDEP develops their Anti-Degradation Policy, we hope to be a valued partner in this process, including a process for nominating Outstanding Resource Waters.

Respectfully,

Pam Harrington

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