



April 17, 2020

Pam Harrington, Northern Nevada Field Coordinator
Trout Unlimited
3086 Crescent Ave
Crescent Valley, NV 89821

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

Dear Ms. Harrington:

The Nevada Division of Environmental Protection (NDEP) Bureau of Water Quality Planning (BWQP) received comments made by Trout Unlimited 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 three areas of concern brought to our attention and have addressed them below. All changes have been incorporated into the draft final Integrated Report.

Trout Unlimited Comment: 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.

BWQP Response: NDEP's Bureau of Water Quality Planning (BWQP) is glad to hear that the web map has provided you with value and insight. Our intent with the web map is to provide all interested parties a centralized place to gather water quality information for surface waters throughout the state of Nevada.

The web map should convey the data reflected in the 2018 Integrated Report. The data tables that the web map utilizes come directly from our water quality assessment reporting tool. We will spot check pH data on the final to make sure the web map correctly reflects the tables.

Our assessment methodology on reservoirs defines each depth in a profile as a unique sample. Knott Creek reservoir was sampled on September 2016 and the pH was over the standard for multiple depths in the profile. As always, the monitoring equipment was checked and found to be operating within parameters. In subsequent sampling of the Knott Creek reservoir pH is periodically over the standard of 9.

Trout Unlimited Comment: 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.

BWQP Response: Comment noted. In addition to ongoing routine monitoring of the state’s mainstem rivers and their tributaries, we also employ a rotating focus-basin method of monitoring in which we intensively sample and explore new waters in one of the state’s 14 hydrologic basins for a period of 2-3 years. In consideration of this bureau’s limited staff and funds, this method allows us to efficiently discover and analyze waterbodies with existing beneficial uses that should have water quality standards.

Most waters in Nevada have aquatic life as a beneficial use. The fish species (cold-water or warm-water) help define criterion established for the water. Recreation has its own beneficial uses, which drives the bacteria criterion set for the water. The beneficial use of recreation does not address “fishery” as Trout Unlimited would appreciate. But that being said, the most protective standards in Nevada are those for protection of aquatic life. The anti-degradation procedure, discussed below, would be an avenue to elect some of these waters as outstanding resource waters. The report has not been modified with the proposed anti-degradation procedure as it is still being developed, we look forward to including an approved procedure in the 2020 Integrated Report.

Waters of the state have water quality standards to protect their beneficial uses. However, if a water of the state is not also a water of the U.S., the assessment for that water is not included in the integrated report. That data is always available by contacting our office. In addition all of the water quality data collected by the Bureau of Water Quality Planning (BWQP) is available to the public at: <https://nevadawaterquality.ndep.nv.gov/>

Trout Unlimited Comment: 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.

BWQP Response: Reference waters are not currently viewable in the web map; however, such a section will be considered when producing the 2020 Integrated Report. Category I waters are viewable in the

web map by using the category search on the blue search button or by using available filters in the "Layers" tab.

Trout Unlimited Comment: 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).

BWQP Response: Thank you for this suggestion. Footers have been added to some of the attachments.

Trout Unlimited Comment: 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.

BWQP Response: BWQP is currently revising the Antidegradation Implementation Procedure. Meetings with stakeholders have helped guide the document during this process. BWQP is planning to include language on nominating "Outstanding Nevada Waters" (ONWs). The current revision being drafted includes language that describes the attributes of an ONW, as well as the process for nominating a water as an ONW and use of Tier 3 protections for an ONW.

BWQP's tentative plan for the Antidegradation Implementation Procedure is to reach out to stakeholders in May and hopefully hold meetings to discuss the procedure. Following the stakeholder meetings will be public workshops in June, with a final draft being submitted to the Legislative Counsel Bureau before June 30. The draft antidegradation implementation procedure and related documents will be posted for public comment on NDEP's website and sent out to our BWQP listserv.

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