



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

Brian Sandoval, Governor
Leo M. Drozdoff, P.E., Director
David Emme, Administrator

December 21, 2015

Julie H. Earnstein, Ph.D., RPA
Deputy SHPO
State Historic Preservation Office
901 S. Stewart St., Suite 5004
Carson City, NV 89701 jernstein@shpo.nv.gov

Subject: Draft Nevada 2014 Integrated Report

Dear Ms. Earnstein:

Thank you for the comments from the State Historic Preservation Office (SHPO) on Nevada's Draft 2014 Integrated Report (IR). The Nevada Division of Environmental Protection (NDEP) Bureau of Water Quality Planning (BWQP) appreciates the SHPO's interest in Nevada's water quality standards and BWQP's assessment of Nevada's waters. NDEP's responses to CRC's specific comments are provided below (SHPO's email comment is attached).

SHPO Comment: The Nevada State Historic Preservation Office (SHPO) would respectfully recommend to our NDEP colleagues that they pay particular attention to any comments received from Tribal members as part of the public participation process as there are bodies of water on non-Tribal lands such as the Truckee River and Lake Tahoe, as just two examples, that have culture-specific sacred/spiritual values and uses that may not be readily captured in the sorts of empirically-based measures and uses documented in this report, but that might very well be impacted by the net changes in quality reflected in this report.

NDEP Response: NDEP has coordinated with a number of Tribes within the State regarding water quality standards, water quality monitoring and Integrated Reporting, including the Pyramid Lake Paiute Tribe, Duck Valley Sho-Pai Tribes, Walker River Paiute Tribe, South Fork Band Council and the Carson Colony Community. NDEP also discusses standards actions or activities with William Campbell, Tribal-State Environmental Liaison for Nevada who coordinates with affected Tribes.

NDEP received no comments from any Tribes concerning the Draft Nevada 2014 Integrated Report.

Nevada's final 2014 Integrated Report has been submitted to the United States Environmental Protection Agency for approval and is available at <http://ndep.nv.gov/bwqp/303dlist2014.htm>. Please contact me at (775) 687-9449 if you have any questions or would like to further discuss these matters.

Sincerely,



John O. Heggeness, Supervisor
Water Quality Standards and Monitoring
Bureau of Water Quality Planning

Cc: David Emme, Administrator, NDEP
Jennifer Carr, P.E., CPM, CEM, Deputy Administrator, NDEP
Kathy Sertic, Chief, Bureau of Water Quality Planning, NDEP

Enclosure

Comment Letter from SHPO.

Skip Canfield

From: Julie Ernstein

Sent: Tuesday, November 24, 2015 2:11 PM

To: Skip Canfield

Cc: Rebecca Palmer

Subject: RE: Nevada State Clearinghouse Notice E2016-048 (Draft - Nevada 2014 Integrated Report)

Dear Skip,

Thank you for circulating the link to the Nevada Division of Environmental Protection, Bureau of Water Quality Planning's *Draft Nevada 2014 Water Quality Integrated Report* (October 2015) through the Nevada State Clearinghouse. I have read the document, prepared in compliance with the Clean Water Act (particularly Sections 303(d) and 305(b) of the CWA) with interest and care. The comments provided here focus on cultural resources/historic preservation issues.

The Draft 2014 Integrated Report contains a wealth of information and, among other things, describes water quality standards, identifies the legal authorities for tracking that information, identifies sources of pollution in Nevada as well as programs and funding sources that assist in tracking such things as nonpoint source pollution, distinguishes the legal limits of allowable loads from the full range of sources, identifies the sources of information for the data presented in the report, and describes NDEP's monitoring program for the state's regions and basins as well as other sources of monitoring data. From there, the report outlines the assessment methodology employed in the study and uses reported water quality data to identify designated beneficial uses for each waterbody. Also of particular utility, the Draft 2014 Integrated Report tracks waterbody changes that have occurred since the previous report in 2012. And finally, the Draft 2014 Integrated Report process affords a range of parties--including members of the public--a number of opportunities to participate as well as a generous period for review and comment on the document as a whole.

From a cultural resources perspective, the report is quite specific in noting that "The *2014 Integrated Report* does not include any waterbodies located on Tribal lands as the State of Nevada has no authority to address these waterbodies" (p. 20). The Nevada State Historic Preservation Office (SHPO) would respectfully recommend to our NDEP colleagues that they pay particular attention to any comments received from Tribal members as part of the public participation process as there are bodies of water on non-Tribal lands such as the Truckee River and Lake Tahoe, as just two examples, that have culture-specific sacred/spiritual values and uses that may not be readily captured in the sorts of empirically-based measures and uses documented in this report, but that might very well be impacted by the net changes in quality reflected in this report.

As always, thank you for the opportunity to read this important document. Should you have any questions regarding these comments, please do not hesitate to contact me directly.

Best,

Julie

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