

Nevada Division of Environmental Protection
Responses to Nevada Public Comments

November 2, 2010

2. Jim Beattie

Jason Kuchnicki

From: Jim Beattie <jcbt@etahoe.com>
Sent: Tuesday, June 22, 2010 11:55 AM
To: Jason Kuchnicki; 'Azad, Mahmood'; Charlie Donohue; Dave Marlow; DStJohn@washoecounty.us; 'Dunbar, Madonna'; Ed Skudlarek; Jim Lawrence; 'Jones, Theresa A'; Kathy Sertic; kcorbrid@mail.co.washoe.nv.us; 'Klein, Kris'; 'Matt Nussbaumer'; 'Nicole Gergans'; pfrost@dot.state.nv.us; abh@charter.net; b2lane@aol.com; bill_horn@ivgid.org; cookiebible1@aol.com; darryl@rci-nv.com; gyezell@charter.net; joe_pomroy@ivgid.org; john@mccall.warpmail.net; kcorbridge@washoecounty.us; kedwards4565@charter.net; michelle@kgid.org; northswanson@aol.com; procove@charter.net; rhgid@aol.com; RPHeffernanTahoe@aol.com; tommyken@charter.net; trackerby@aol.com
Subject: RE: Draft Lake Tahoe TMDL document

I have been actively observing the efforts and results of the efforts to deal with Lake Clarity since 1979. I have not read the report you kindly sent, only a brief scan. I am sure that vast work has been done to produce it and will get to reading it. In the interim a couple of observations:

Even the good Dr Goldman, during the President Clinton visit in conversation with Jim Morris and me, admitted that they have no idea whether or not BMP's are cost effective. I and others are sure they are not because the report states what many suspected years ago - fine particulate matter is the primary cause of decreased Lake clarity and also, BMP 's do but very little to reduce same. We can do little about fine particulate matter carried in the winds from the west into the Basin but we CAN and SHOULD do something about it in the Basin.

Year after year the practices required to be followed by TRPA regulations regarding damping earth when excavating and the covering of trash and dirt truck loads are not being followed. The excavating of the convention center and ongoing curb and gutter additions are prime example. Thousands of truck loads filled ad driven out of the Basin. Right now drive up or down Kingsbury Grade and observe the excavations for curb and gutter installations.

Even in little old Hawaii at least on Maui and Kona, you do not see one open body on roads that is loaded without a cover over the load.

California and Nevada Government and Commercial street sweepers running dry without or just barely watering and releasing vast clouds of fine particulate matter into the air to be wind blown out over the Lake and settle into the water.

I have twice submitted written complaints to TRPA about this and after receiving no answer, checks and was casually told that TRPA has contractors checking on such matters.

Is this dealt with in the report? Your comments will be appreciated.

Thank You

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Response

Beattie-1: The Pollutant Reduction Opportunity (PRO) analyses considered numerous pollutant control options (PCOs). The PRO analysis featured a screening process to ensure inclusion of only those PCOs for which pollutant load reduction could be quantified. Therefore, covering trucks hauling dirt and debris could not be included in the analysis as the benefit of this action could not be quantified. However, with respect to bare soil and disturbed areas, the following PCOs were included in the PRO analysis:

- ◆ Pave or apply gravel to unpaved roads
- ◆ Limit speed on unpaved roads & at construction sites
- ◆ Require adequate soil moisture or other dust suppression techniques during earth moving operations

The Recommended Strategy for TMDL implementation with respect to the Atmospheric deposition source category is contained in Section 11.3.3 of the Lake Tahoe TMDL Report and calls for implementation of these actions.