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*A healthy watershed
that meets the water
needs of all users*

February 16, 2022

Andrew Bain
Carson River Mercury Site, Remedial Project Manager
U.S. Environmental Protection Agency, Region 9 (SFD 8-2)
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RE: CWSD Comment Letter on CRMSS Proposed Interim Plan

Dear Mr. Bain:

Thank you for the opportunity to comment on the Carson River Mercury Superfund Site (CRMSS) Proposed Interim Plan. In formulating our comments, Carson Water Subconservancy District (CWSD) read the plan, attended the virtual public meetings hosted by Nevada Division of Environmental Protection (NDEP) and United States Environmental Protection Agency (USEPA) (in Nov and Feb), and met with our Carson River Coalition partners. CWSD understands there is no responsible party helping to fund clean-up efforts and pay the cost for this historical and large-scale mercury contamination. We also know this site does not fit the normal Superfund site mold. As such, this issue should be looked at differently to determine a workable remedy.

Consideration of the USEPA's mission and not just the specific requirements under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA 1980), should be considered when guiding actions in the Carson River. This letter goes into detail regarding CWSD's concerns with the proposed interim plan; however, the concerns that rise to the top are addressed in the bulleted points below:

- A. CWSD is extremely concerned that local governments are being denied federal disaster aid from the Federal Emergency Management Agency (FEMA) for federally declared disasters within the CRMSS. FEMA claims they are the funding agency of last resort and has stated that due to the Superfund

designation they would not provide aid, despite a federal disaster being declared. The proposed interim remedy does not address these concerns nor do any of the proposed Alternatives 1-4. Not having access to FEMA funding due to the CRMSS being a designated Superfund site under CERCLA is untenable. USEPA must address this issue before a plan, interim or otherwise, becomes effective. *(See Letter Sections 2.b & 5.a & b)*

B. CWSD believes Alternative 2, USEPA's preferred alternative and proposed interim remedy, does not address the issues related to the movement of mercury throughout the watershed, which is not only a human health risk, but a continual ecological hazard. The proposed alternative should be an integrated approach between Alternatives 2-4. The alternative should not just include outreach efforts for human health, but prioritization and implementation of bank stabilization projects in the areas that present the highest risks for moving mercury. A sediment transport study/geomorphic assessment of the river could identify these areas and focus project implementation. This approach may be expensive, but will have multiple benefits to human health, land stability, water quality, wildlife, and its habitat *(See Letter Sections 4.a-b & d, 5.b-c, & 6.a-b)*. CWSD has tried to address funding concerns for projects within the CRMSS in bullet C, below.

C. Coordinating, funding and implementation of projects is financially challenging given the historical nature of the mercury contamination and because there is no responsible party associated with this site. This financial challenge appears to be a major factor in the USEPA choosing Alternative 2 as the preferred path forward. CWSD proposes USEPA spearhead the creation of an interagency committee to develop a strategy/agreement to help plan, implement and fund necessary studies, staffing, and on-the-ground implementation of projects with mutually beneficial outcomes. This interagency group is a critical element of the solutions to bullet points A & B above. Models of these types of agreements and working groups are available. Working together will share the burden associated with the historical mercury contamination and combine resources (financial, scientific, technological, and political) to benefit the CRMSS communities, their economies, and the local environment. Waiting for an amenable final remedy solely from the USEPA is not a workable solution to the CRMSS issues, now, or into the future. *(See Letter Sections 2.b final para, 5.b-c, 6.b-c & 7.a)*.

D. Permitting and testing requirements associated with any new construction in the CRMSS must not hamper the implementation of restoration and bank stabilization measures designed to keep the soil in place and improve water quality in the Carson River Watershed. The plan needs to discuss and itemize the cost estimates, especially those associated with EPA and NDEP oversight, including testing, analysis and monitoring in Alternatives 2-4 along with any permitting requirements for the various activities. CWSD and our partners believe these requirements should not be borne or solely borne, by those entities seeking to provide critical projects for riparian restoration, bank stabilization and water quality improvements. Funding for any special testing and monitoring should be part of USEPA's strategies and Alternatives in the interim plan. *(See Letter Section 4.a)*

E. If USEPA is unable to address the above concerns outlined in bullets A-D regarding FEMA, funding, bank stabilization and water quality issues, interagency cooperation, and testing and monitoring requirements in this proposed Interim Plan, the alternatives need to be revised and reanalyzed to include an option for delisting the CRMSS from the CERCLA Act. This at least would benefit the communities so they could seek FEMA funding during disasters, and work with NDEP to address the

mercury pollution issues within the watershed. This ultimately, may lead to less administrative burden and more ability to find creative solutions to this immense historical pollution legacy.

F. Other concerns and potential solutions are raised in detail in this letter below.

We have put the comments in a logical order based on sections within the plan. When possible, we have specified the page numbers to assist with clarity and the nexus of our comments. The following are our comments and concerns relating to the proposed *interim* plan for the CRMSS:

Interim Remedy/Proposed Solution

1. Pages 1-3: Interim Remedy Discussion –

“When new technology and/or more extensive evaluation of Lahontan Reservoir and Washoe Lake is available, a final remedy can be determined (p. 1).” CWSD is concerned about the USEPA’s and NDEP’s decision to declare an interim remedy, which relies on future technologies to be invented, may just be “kicking the can down the road” for the future generation to figure out. CWSD understands that this interim step may be necessary to allow current human health risks to be remedied; however, CWSD would like the interim plan to contain the following:

- a. Clarity on the specific steps that will continue to be taken and a timeline for those steps needs to be included in this plan. This will help alleviate the concern that the interim nature of the plan is not just a means to tick the box for the federal government in the short and long term, and it would show how this interim remedy fits into finding the final remedy. CWSD has concerns the site will fall from the USEPA’s priority list and little action, or funding will be spent toward determining a final remedy as we are aware that true clean-up of the mercury is highly unlikely at this large-scale site.
- b. Please specify the types of new technology that USEPA is hoping to have before determining a final remedy for the CRMSS. What is the more extensive evaluation that is needed for Lahontan Reservoir and Washoe Lake? What studies are unable to be completed now that require an interim plan instead of a final plan?
- c. A discussion about how to include the things not discussed either at all or sufficiently in the plan, including the bulleted items in A-E.
- d. The Statement of the Problem does not incorporate in detail, how mercury continues to move through the Carson River Watershed in during high flows and flooding. This is an on-going issue that needs to be in the problem statement and seriously addressed in both the interim and any final remedy.

Background/Site Characteristics/Superfund Designation

2. The designation of the Carson River as a Superfund Site has been controversial. There are those in the community who wish the site had never been listed under CERCLA. Although this may not be a normal part of a proposed plan, addressing these concerns by providing critical information is important to understanding why the site was listed, how the listing is serving the communities, and the burdens the listing may impose on communities:

- a. The mercury contamination in the Carson River is unprecedented in many ways and the science bears this out. Although the background sections and the Cleanup Framework, (pages 3-6), discuss the science, a few key tables from the remedial investigation and feasibility studies would be helpful in relation to the amount of mercury in the water, fish, and waterfowl. It would also be appropriate to compare the unique aspects of why the site was listed (even to other places in the world). USEPA staff who write these plans have the benefit of working with these issues every day. Providing a comparison table that shows just how large, unique, and complex the CRMS is in relation to other mercury contaminated areas could be helpful.
- b. Declaring an interim remedy with no end in sight for a final remedy leaves a heavy burden from the perspective of the counties and communities within the site. As the site is so large, it does not fit the Superfund cleanup box, and as the interim plan suggests, there are presently no technologies to properly clean up all the mercury. How is being listed as a USEPA Superfund site beneficial? Are there other administrative options to reaching a final remedy that could result in positive outcomes? Once listed, can the site be delisted despite not being cleaned up? CWSD is not suggesting that anyone wants to put their heads in the sand and ignore the complexities and science associated with the site, but there are concerns that being listed brings additional administrative burdens, especially when seeking federal funding for other types of projects in the area.

Specific issues relating to FEMA refusing to fund flood mitigation projects in the CRMS have yet to be resolved. CWSD has discussed this issue with both USEPA, NDEP, FEMA and NV Dept of Emergency Management, and no progress has been made toward a solution. USEPA needs to resolve this issue through a potential cooperative agreement with all the other Federal Agencies who are involved or might be involved with the CRMS. Not being able to obtain FEMA funding for flood mitigation, especially post flood disaster funding, when we know the mercury will move and infrastructure such as bridges and diversions may be lost or compromised, is devastating to this area.

Is this just a FEMA Region 9 issue/policy? Surely there are rivers elsewhere that have superfund sites where this issue has been worked through? Is this a FEMA HQ policy? If so, this is a critical flaw in the process and needs to be addressed by USEPA and FEMA before making a determination, whether interim or final, on the CRMS.

CWSD has concerns this critical oversight is not just going to be a FEMA issue and may be the future stance of all Federal Agencies when funding is sought for work within the site. For instance, what if this same stance is taken by US Bureau of Reclamation (USBR) when funding is sought for restoration and planting, National Fish and Wildlife Federation (NFWF) for Invasive Species funding, National Resource Conservation Service (NRCS) National Waters Quality Initiative (NWQI) for improved agricultural water quality practices, and/or other EPA branches for non-point source pollution water quality protection initiatives? There are multiple benefits when working with all these entities that would assist with holding the soil in place. Will CWSD and our partners be completely hamstrung from receiving funding to implement these types of programs

that have multiple benefits to water quality, the environment, and the economy? When the next flood comes, what happens then? Flooding causes the mercury to move. Is this a Federal Government liability concern, or does this highlight funding constraints amongst the agencies and division into silos rather than agencies working together?

CWSD is a regional planning agency. We need to have answers to these questions to guide our planning and work cooperatively with all our partners in the Carson River Coalition. Although you are proposing an interim remedy, being listed as a Superfund site has costs, even before any actions are taken. We trust USEPA and NDEP understands the gravity of this situation. It is time for the USEPA to spearhead a Cooperative Agreement amongst the Federal, State, and local agencies that also includes a funding mechanism. Such an agreement will ensure not only that the interim remedy is workable, but that the CRMS area will not lose out on funding opportunities because they are in a listed Superfund site. This issue with no responsible party makes it necessary to think outside the box, although we imagine that there are similar cooperative agreements in other areas (Bunker Hill, ID) that could potentially be good examples. CWSD and our partners all want the best for this watershed, and we know EPA does, as well. Let us figure out a solution that will ensure the remedy is achievable and is not going to have devastating consequences relating to loss of funding opportunities, and on ground solutions to the myriad of water quality and ecological issues facing the Carson River in this area.

Summary of Risks

3. Pages 6-8 Health Risks: EPA studied the probability of humans and/or the environment will be harmed from exposure to mercury.
 - a. *“The site risk assessments found human health risks could exceed acceptable levels in sensitive populations (Page 7).”* CWSD understands there is a need to act now on human health risks relating to mercury poisoning/contamination and its adverse effects on the Carson River Watershed community. As stated in the interim plan, this is USEPA’s responsibility under Superfund law. The plan should spell out EPA’s jurisdictional authority in this matter. We are aware EPA has put up signage and has asked NDOW to curtail their commercial operations regarding Sacramento Blackfish from Lahontan Reservoir. Is this issue the main reason for the release of an interim plan rather than a final remedy? Will the final approval of this interim plan provide a clear legal determination on the matter moving forward?
 - b. On Page 7 & 8 Table 1 and its summary: This table contains too much information and does not clarify the risks in a clear and concise manner. The Table and the narrative appear completely inconsistent. The summary (Page 8) is long and discusses unacceptable hazard quotients (HQs), yet the Table lists “none” in several places and is confusing. Table 1 should contain the levels of HQ/HI per Receptor and type of exposure factor. We realize this is difficult information to convey, but perhaps breaking it into graphs (pie chart/histogram/colored graphics) per Receptor would yield more digestible/understandable results. A graphic using colors/shading/ that indicates the relative risk per receptor and subarea that highlights the HQ’s, or a range of HQ’s may be a possible solution. CWSD would like to see Table 1 and summary changed to better

convey the information USEPA hopes to share. The map showing the geographical areas associated with this Table and Summary needs to be located closer to the Table within the document, so the subareas are easily identified while looking at the Table or other graphical information. The map is too small and very hard to read. Labels should be larger and perhaps show overall map and then a blown-up version of each subarea.

- c. Page 7: The plan states the studies of impacts on birds that eat fish in Lahontan Reservoir were inconclusive and then states... *“Because significant ecological risks were not identified, EPA will not address them in this plan.”* How does inconclusive results lead to identifying no risk? Please provide more details in the interim plan as this explanation appears faulty. Also address whether this will be continued to be studied, and how it will be included in determining the final remedy.

Remedial Action Objectives (RAOs):

4. Pages 9-10:

- a. The Remedial Action Objectives (RAOs) only discuss mercury contamination as it exists today, and/or is disturbed by construction activities. It does not address a known mover of mercury, high flows, spring runoff, and flooding which will always be an issue with this site. The Site Background and Characteristics specify that mercury trapped in miles of abandoned river channel is an ongoing source of contamination, entering the river during riverbank erosion and construction activities. As these abandoned river channels are located in the floodplain, flooding issues should also be listed here as a source of moving the mercury. Please identify what types of construction activities are being referred to here. Bank stabilization projects that focus on keeping the soil in place with roots and covered with vegetation should not be considered as a negative impact. This section needs to clarify what types of construction are potentially impactful vs. beneficial and how these types of beneficial construction will be administered by USEPA and NDEP. Are restoration type activities going to be negatively impacted by administrative requirements or expenses that will make it economically difficult to complete these projects? How will flood mitigation be allowed to go forward? CWSD would like USEPA to outline the permitting and construction monitoring requirements and the costs associated with these so these costs in time and resources, can be considered by our partners who plan to move forward with river corridor and floodplain projects in the CRMS. CWSD and our partners believe these requirements should not be borne or solely borne, by those entities seeking to provide critical projects for riparian restoration, bank stabilization and water quality improvements. Funding for any special testing and monitoring should be part of USEPA’s strategies and Alternatives in the interim plan.
- b. Page 9 suggests that Final RAO’s to protect human health and wildlife will be determined in the Final Record of Decision (ROD) at a later date and time. When will this Final ROD be moving forward, and what is the potential timeframe? Will a new Remedial Investigation (RI) and feasibility study (FS) need to be completed at that time? Isn’t there enough information to determine that the soil needs to be held in place through restorative means such as planting deep rooted natives, interim cover plants, etc.? There will always be the issue of major flooding moving soil, and therefore mercury. What future technologies will be available to clean the site without damaging

the broader ecosystem? CWSD is concerned that future technologies will be cost prohibitive and ecologically devastating. The river corridor is doing its best to get to equilibrium; therefore, we need solutions that start from what we know now. Future technologies may be found, but those can be added into the solution when they come to light. Given the USEPA is a Federal Government Agency that is charged with the health of the air, land, and water (see Mission inset below). Have mercury hot spots been identified within the river corridor that can be the emphasis of an Alternative that not only focuses on human health, but the health of the river, the river corridor, and the ecological integrity of the area? It is important to be assured that the interim nature of this plan is not going to leave this area in limbo, and CWSD would prefer an Alternative that seeks a more integrated approach to the complex issue, rather than waiting and relying upon new technologies being available at some point in the unknow future.

US EPA Mission:

The mission of EPA is to protect human health and the environment.

EPA works to ensure that:

- *Americans have clean air, land and water;*
- *National efforts to reduce environmental risks are based on the best available scientific information;*
- *Federal laws protecting human health and the environment are administered and enforced fairly, effectively and as Congress intended;*
- *Environmental stewardship is integral to U.S. policies concerning natural resources, human health, economic growth, energy, transportation, agriculture, industry, and international trade, and these factors are similarly considered in establishing environmental policy;*
- *All parts of society--communities, individuals, businesses, and state, local and tribal governments--have access to accurate information sufficient to effectively participate in managing human health and environmental risks;*
- *Contaminated lands and toxic sites are cleaned up by potentially responsible parties and revitalized; and*
- *Chemicals in the marketplace are reviewed for safety.*

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- c. Page 10: OU2 – Alternative 2 goals, Goal: Reduce Risk from Consuming Fish. Who or what agency will be addressing and administering compliance with this recommended action level of 80 mg/kg total mercury? How is this included in the economics of the alternatives?

- d. Page 10 – Goal: Reduce Exposure as a Result of Soil/sediment. Is there a map of where the locations of soils at the action levels, or would any construction/soil disturbance require testing? Who would pay for that testing, and what is the timing on the testing? Is there a difference if the project is private or public, or if the project is for bank stabilization, emergency bridge repair, etc.? Please inform CWSD how the categories of projects and requirements to meet this goal.

Description of Remedial Alternatives:

5. Pages 11-14: USEPA has identified the preferred alternative is #2:

- a. Page 11: No Action Alternative: –No cost to inaction is not entirely correct. No action means the status quo remains, which we know includes human health risks that have costs. Additionally, the Superfund Site designation has negatively impacted the area and access to FEMA funding for critical flood mitigation and repair projects along the river and its tributaries. This is a large cost to the local jurisdictions. No Action is not an acceptable alternative.
- b. Page 12: Alternative 2: USEPA Preferred Alternative focuses mainly on human health and continues the Long-term Sampling and Response Plan (LTSRP) which includes annual monitoring of surface water, sediments, fish tissue, wild plants, and waterfowl. The interim nature of the plan suggests that a final remedy is not possible as the technology to clean up the mercury or stop the methylation process does not exist. Although this may be true at this time, we know now that the cumulative effect of keeping the soil in place by restoring the riparian areas and placing deep rooted plants, and rock stabilization that promotes plant growth, can limit the impacts of flooding and the movement of mercury. This Alternative does not consider the need for USEPA or NDEP funded efforts or solutions to limit the movement of mercury around the site during high flows and flooding, and how this further contributes to continued contamination of sediment and bioaccumulation in fish, wild plants, and waterfowl. However, the proposed Land Use Controls (LUCs) do state that USEPA and NDEP would provide guidance for soil and/or sediment sampling and management for future construction activities in the floodplain or active channels (performed by residential or non-residential) performed by landowners, or other government agencies. CWSD and our partners have concerns that permits, and sampling costs and time could be impactful to these otherwise positive actions toward bank stabilization.

The interim proposed plan and preferred Alternative 2 costs equate to approximately \$787,500 (annually 30-years) for annual operation, monitoring and maintenance. Does this include the amount provided to NV and administered by NDEP? Would the Geographic Information database and web mapping tool be created as sampling was conducted or has it already been created? Are the capital expenses during the first year to be used for this GIS mapping and signage? Is 30-year planning window standard and will this mean the future final remedy will be 30 years in the making? CWSD and our partners are hesitant about an interim plan being finalized and then the site being shelved, with a lot of unanswered concerns and no recourse for finding solutions to the FEMA funding and other issues until some unspecified time in the future. The plan needs to discuss what the funds for each Alternative would pay for and a timeline for

taking additional actions to resolve the larger unanswered questions relating to funding for site remediation, potential delisting, cooperative actions, etc.

Alternative 2 may be the cheapest alternative as there is no responsible party; however, it does not consider issues associated with the site being listed as a Superfund Site and the ramifications for funding other types of projects within its project area. An example being that FEMA pulled funding from a federally declared disaster area citing that because the project area is within a designated superfund site, funding should be sought from the USEPA to address the area. What happens when the bridge in Dayton goes out due to flooding, or Weeks bridge on 95A? Will the Counties, Nevada Department of Transportation (NDOT), or the State be responsible for funding these emergencies with no Federal assistance from FEMA? Again, these issues are not considered in the Alternatives and need to be addressed critically and thoroughly by USEPA as a part of the Alternatives so an appropriate remedy can be found.

- c. Pages 13-14: Alternatives 3-4 are not being considered by USEPA, but CWSD and our partners would like to see an integrated approach in this interim plan that looks at bank stabilization and restoration efforts that will hold soil in place during spring runoff and flooding events especially in old river channels and along the river corridor. Alt 2 may be a way to focus on the immediacy of human health issues faced due to issues associated with a permitted commercial use and stocking of fish. However, Alternatives 3 & 4 better meet the mission of the USEPA from both a human health and an ecological/environmental standpoint. CWSD suggests USEPA fund a sediment transport study and geomorphological assessment of the river that identifies these egregious areas for erosion, mercury hot spots, etc. which could be used as a baseline to prioritize future projects where funding should be spent. This could be incorporated into an integrated Alternative that included elements of Alternatives 2-4.
- d. Pages 13-14: The funding required by Alts 3 & 4 is significantly higher; however, if USEPA could garner an integrated approach to funding by creating a multi-jurisdiction agreement and strategy that includes Federal, State, and local entities with a vested interest in the water quality and ecological issues in the area, perhaps the expenses could be shared. CWSD proposes something like the National Fish and Wildlife Foundation approach or the Desert Terminal Lakes Fund as these seem like a very reasonable way to integrate goals and amass resources, including the funding required. This integrated approach could include new State funding administered by NDEP and DCNR that would go toward projects that meet the mission of not only the USEPA and NDEP, but NV State Lands, Nevada Department of Wildlife, NDOT, and Nevada Emergency Management Service (NVEMS). Other federal entities that should be involved and part of the agreement include: the Natural Resource Conservation Service (NRCS), specifically their National Water Quality Initiative, the United States Bureau of Land Management (USBLM), the US Bureau of Reclamation (USBR) and US Fish and Wildlife Service (USFWS), US Federal Highway Administration (FHA) and Federal Emergency Management Agency (FEMA). Some of these agencies own land in the CRMSS. An MOU agreement amongst these agencies, and a dedicated funding source would benefit the area and start to address the most egregious erosion problems that are otherwise challenging to fund. It would share the burden for the historical mercury pollution and seek improvements that cumulatively will limit the movement of mercury

and protect human health with the tools we have today. It would also provide a platform to discuss options when new technologies are available.

Evaluation Criteria/Nine Criteria Analysis:

6. Pages 15-17

- a. Page 15: Alternative Evaluation Criteria: Reduction of Mobility, Toxicity or Volume by Treatment Evaluation Criteria: CWSD has concerns about the ‘by treatment’ portion of this evaluation criteria as any such treatment would have to be considered for its cumulative impacts, not just its by treatment impacts. This is the case with all water quality improvements that are Nonpoint Source based. CWSD questions why stabilization of the soil to hold the mercury in place is considered to not even partially meet the criteria. In theory, if this method were to be practiced in the most egregious portions of the river, it would surely reduce the mobility of the mercury; on what scale and timeline is not clear at this time. Good results would depend on weather, runoff, and the capacity to complete large-scale projects that would have the opportunity to become rooted and stay in place over time. Stating this is an unknown, especially in relation to the mercury mobility, seems a more appropriate response to the criteria. Perhaps the preferred Alternative could be modified to include funding for the geomorphology and sediment transport study for the CRMSS portion of the river that would also identify/prioritize project locations using best practices in floodplain protection and management, bank stabilization and riparian restoration. The integrated Alternative could include pilot bank stabilization or old river channel restoration projects that could be measured over time. These types of projects could not only be a test of solutions for human health and ecological concerns, but also be a testing ground for a joint MOU and grant funding opportunities discussed above. This may only be a partial solution, but this could then be linked to creating the final ROD. It would also show faith on the side of the USEPA that they plan to continue to do work toward a final remedy in a reasonable amount of time.
- b. Page 16: Implementability: Alternatives 3 & 4 may not be as challenging as one would think if a Cooperative Interagency MOU type agreement/strategy is instigated by USEPA. While costly, it may be that soils remain in place and restoration using planting and live roots will more successfully hold the soil in place. Yes, in large floods, this method may still fail in certain areas, but if the efforts are focused and prioritized as described above, in a 30-year lifespan of the plan, it is likely that there may be benefits even during a highly devastating flood and the integrated effort is a worthy exercise.
- c. Page 17: Cost: please explain fully what the cost of O & M and NCP is for the State of Nevada while spelling out what the acronyms stand for, just so everyone knows. Thank you in advance.

Discussion of Evaluation of Alternatives

7. Pages 18-19

- a. EPA Prefers Alternative 2: Page 19 under CERCLA Section 121(b) discussion one of the requirements is that it be cost effective. Putting off the final remedy to the future might make the interim Alternative 2 plan more cost effective, but at what cost? This site will

always be contending with the effects of mercury and figuring out how to work together to address this difficult issue, needs to be outlined and prioritized in this proposed interim plan.

CWSD appreciates the opportunity to comment on the proposed interim plan. We expect the USEPA to consider the critical nature of the issues raised in our letter especially those regarding:

- the designation of the Superfund site being detrimental to receiving FEMA disaster aid,
- the need to integrate the Alternatives to include aspects of Alt. 2-4 to limit the movement of mercury,
- the importance of sharing the burden for the mercury pollution by creating an Interagency coordination agreement focused on planning, coordination, funding, and implementation, and
- outlining the permitting and monitoring requirements so they do not hamper the implementation of restoration and bank stabilization projects within the site.

We look forward to discussing all aspects of this letter and seeing the USEPA's response to comments. We are all in this together and we all want the best solution for the CRMSS and the overall health of the Carson River Watershed.

Sincerely,

Stacey Giomi
Chairman of the Board
Carson Water Subconservancy District

Cc: (TO BE ADDED)

Mark Amodei

Jackie Rosen

Catherine Cortez-Masto

(All Local State Legislators)

Carson City

Lyon County

Churchill County

Storey County

Carson River Coalition Floodplain Management Working Group