

Response to Washoe County Health District Comments on the Application for Clean Water Act Section 404 and 401 Permit, SouthEast Connector

This memorandum presents responses to Washoe County Health District's September 16, 2013, comments on the SouthEast Connector roadway project's July 2013 Clean Water Act Section 404 and Section 401 Permit Application (Ref: Public Notice SPK-2010-01058, SouthEast Connector, NV). This application was submitted to the U.S. Army Corps of Engineers (USACE) on July 19, 2013. The original comment is reiterated below, along with the associated response in italicized format. A copy of the Washoe County Health District's comments is included as an attachment to this memorandum.

Item No. 1:

In regards to the Southeast Connector Project in Reno Nevada; Washoe County Health District has regulations applicable to the project's wetland mitigation that need to be considered. The following Regulations Governing the Prevention of Vector-Borne Diseases pertain to this project:

040.021 If man made channels are to be lined with concrete or other suitable materials, channels shall be graded to prevent ponded areas.

Response: Channels and other project-constructed stream- and storm-flow conveyance features (e.g., culverts) will be graded to prevent ponded areas. Not all of the grades for channelized flow presented on the 90% Plans have a positive slope. Areas that are currently ponded in the Rosewood Lakes and Mira Loma areas will be preserved as required by the provision of the wetland impact avoidance presented in the 404 permit submittal.

040.031 Reservoirs, recreational lakes, or other below ground-level water basins near populated areas, shall have a minimum of 3:1 side slopes, have banks lined to two feet below the water line with suitable materials such as rip rap, concrete, or clay, and have banks maintained to ensure permanent weed prevention. The Army Corps of Engineers may be consulted for coordination of proposed mitigation plans and applicant mitigation proposals on mitigation projects for insect impacts under the regulatory program pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899. The Truckee Meadows Regional Stormwater Quality Management Program Construction Site Best Management Practices Handbook shall also be utilized to provide for the prevention of pollution from stormwater.

Response: The project will not construct reservoirs, recreational lakes, or other below-ground-level water basins, as described in the regulation. The project will restore and construct facultative and obligate wetlands pursuant to the USACE 404 permit. Impacts to existing wetlands will be minimized, to the extent practicable, and replacement of existing open water disturbed by construction will be through like-kind replacement, thereby avoiding expansion of open water acreage throughout the project area. Where impacts are unavoidable, compensatory mitigation strategies, including restoration (e.g., reestablishment of temporal wetland impacts and rehabilitation via intensive noxious weed management programs), establishment (e.g., creation of new wetlands where they did not previously exist) and preservation (e.g., conservation easement and/or perpetual deed restrictions) will be undertaken pursuant to the 404 permit.

040.032 Ponds with raised embankments for storage of water or wastewater shall be lined with rip rap, concrete, or clay, or, if soil characteristics permit, have steep interior side slopes that will prevent emergent vegetation.

***Response:** As indicated in the response to **040.031**, the project will not construct reservoirs, recreational lakes or other below-ground-level water basins for the purposes of water or wastewater storage.*

040.044 An easement for Vector-Borne Diseases staff access may be necessary to allow unimpeded inspection and treatment. In some areas, aerial navigation agreements may be required to indenture an easement.

***Response:** Requirements concerning agreements or easements for access, including those that may be needed to allow Vector-Borne Diseases staff access for inspections and treatment, will be applied to the land in the event that ownership transfers.*

040.054 Irrigation ditches and pipelines shall contain means for draining after irrigation to prevent creation of breeding habitats within these facilities.

***Response:** Irrigation ditches and pipelines are not proposed to be constructed in connection with the project, beyond perpetuation of existing irrigation conveyances. An irrigation ditch will be cut along the adjoining Butler Ranch property to convey irrigation water into and from Steamboat Creek and will be graded to prevent ponding and creation of breeding habitats.*

040.070 Mosquito prevention design requirements for project developments shall be considered in conjunction with the Vector-Borne Diseases Program.

***Response:** As indicated in the response to **040.031**, the project will restore, enhance, and preserve the natural wetlands environment along Steamboat Creek within the project's footprint. Mosquito prevention requirements have been considered in the project's overall site grading and design, where applicable (e.g., culverts and other conveyance features).*

List of Preparers and Distribution

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DATE: February 20, 2014

ATTACHMENT

**September 16, 2013,
Washoe County Health District,
Environmental Health Services Division
Comments to the SouthEast Connector Project**



WASHOE COUNTY HEALTH DISTRICT

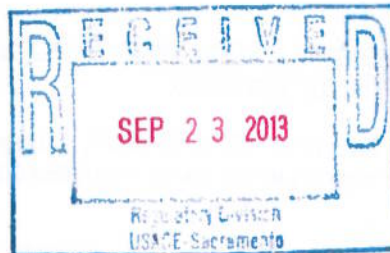
ENVIRONMENTAL HEALTH SERVICES DIVISION



Public Health
Prevent. Promote. Protect.

September 16, 2013

US Army Corps of Engineers
300 Booth Street
Reno, NV 89509



RE: Southeast Connector Project in Reno, NV

Dear US Army Corps of Engineers:

In regards to the Southeast Connector Project in Reno Nevada; Washoe County Health District has regulations applicable to the project's wetland mitigation that need to be considered.

The following Regulations Governing the Prevention of Vector-Borne Diseases pertain to this project:

040.021 If man made channels are to be lined with concrete or other suitable materials, channels shall be graded to prevent ponded areas.

040.031 Reservoirs, recreational lakes, or other below ground-level water basins near populated areas, shall have a minimum of 3:1 side slopes, have banks lined to two feet below the water line with suitable materials such as rip rap, concrete, or clay, and have banks maintained to ensure permanent weed prevention. The Army Corp of Engineers may be consulted for coordination of proposed mitigation plans, applicant mitigation proposals, on mitigation projects for insect impacts under the regulatory program pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899. The Truckee Meadows Regional Stormwater Quality Management Program Construction Site Best Management Practices Handbook shall also be utilized to provide for the prevention of pollution from stormwaters.

040.032 Ponds with raised embankments for storage of water or wastewater shall be lined with rip rap, concrete, or clay, or, if soil characteristics permit, have steep interior side slopes that will prevent emergent vegetation.

040.044 An easement for Vector-Borne Diseases staff access may be necessary to allow unimpeded inspection and treatment. In some areas, aerial avigation agreements may be required to indenture an easement.

040.054 Irrigation ditches and pipelines shall contain means for draining after irrigation to prevent creation of breeding habitats within these facilities.

040.070 Mosquito prevention design requirements for project developments shall be considered in conjunction with the Vector-Borne Diseases Program.

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www.washoecounty.us/health
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A copy of the Regulations Concerning the Prevention of Vector-Borne Diseases can be found online at www.washoecounty.us/health/regulations.html

Please contact me or Mr. Jim Shaffer at (775) 785-4599, jjjeppson@washoecounty.us or jshaffer@washoecounty.us in regards to the above regulations pertaining to this project.

Sincerely,



Jeff Jeppson, Vector-Borne Disease Specialist
Environmental Health
Washoe County Health District

CC: Jim Shaffer, WCHD-VBDP Program Coordinator/Plan Reviewer
US Army Corps of Engineers, Sacramento District