## STATE OF NEVADA

STEVE SISOLAK, Governor
PUOY K. PREMSRIRUT, Chairwoman
KARA J. KELLEY, Vice Chairwoman
ERIC WITKOSKI, Executive Director



JAMES B. GIBSON, Commissioner

MARILYN KIRKPATRICK, Commissioner

ALLEN J. PULIZ, Commissioner

DAN H. STEWART, Commissioner

CODY T. WINTERTON, Commissioner

Phone: (702) 486-2670

Fax: (702) 486-2695 http://crc.nv.gov

## COLORADO RIVER COMMISSION OF NEVADA

January 31, 2020

Dave Simpson
Environmental Scientist
Standards Branch, Bureau of Water Quality Planning
Nevada Division of Environmental Protection
Department of Conservation and Natural Resources
dsimpson@ndep.nv.gov

Subject: Comments on Draft Nevada 2016-2018 Water Quality Integrated Report – December 2019.

Dear Mr. Simpson:

The Colorado River Commission of Nevada (CRCNV) appreciates the opportunity to comment on the "Draft Nevada 2016-2018 Water Quality Integrated Report." CRCNV is an executive agency of the State of Nevada responsible for acquiring and managing Nevada's share of water and hydropower resources from the Colorado River.

CRCNV sees three main areas that need to be addressed, the fluoride listing in Bowman Reservoir, the fluoride listing in Lake Mohave, and the turbidity listing in the Muddy River at Lake Mead.

## Attachment 3 – Water body Assessment Results – Category 5 Water, 303 (d) List

Basin	Waterbody Code	Waterbody Name of Impaired Water	Standard Not Meeting
	NV13-CL-23-C_00 NV13-CL-23-C_00	Bowman Reservoir Bowman Reservoir	Fluoride IRR Fluoride WLS
	NV13-CL-38_00 NV13-CL-38_00	Lake Mohave Lake Mohave	Fluoride IRR Fluoride WLS
NV13	NV13-CL-12_02	Muddy River at Lake Mead	Turbidity SV AQL

CRCNV questions the fluoride listing for Bowman Reservoir for irrigation and watering of livestock. Beginning in 2007, the Southern Nevada Water Authority developed a "Rationale for Proposed Revisions for Fluoride Water Quality Standards for the Muddy River" which was approved by the State Environmental Commission in June 2008 and permanently adopted by the United States Environmental Protection Agency in June 2009. Please check to ensure the new standard of 2.6 mg/L was used in the Waterbody Assessment.

Second, CRCNV questions the fluoride listing for Lake Mohave for irrigation and watering of livestock. Lake Mead is not listed for fluoride and it is upstream of Lake Mohave. CRCNV questions whether drinking water data may have been included in the assessment. Please consider rechecking these data.

Third, please consider removing the turbidity listing for the inflow of the Muddy River at Lake Mead. NAC 445A.2152 Colorado Region: Lake Mead states in the footnotes "The Commission recognizes that at entrances of tributaries to Lake Mead, localized violations of standards may occur." In previous meetings with NDEP CRCNV's staff have been told that this applies to turbidity in the inflow areas of Lake Mead.

If you have any questions about these comments, please do not hesitate to contact Peggy Roefer at 702-486-2669 or <a href="mailto:proefer@crc.nv.gov">proefer@crc.nv.gov</a>.

Sincerely,

Peggy Roefer

Environmental Program Manager Colorado River Commission of Nevada

PR/glg

CC:

Eric Witkoski, CRCNV Sara A. Price, CRCNV Angela Slaughter, CRCNV Seth.shanahan@snwa.com Todd.tietjen@lvvwd.com