



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor

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April 7, 2014

Sara A. Price
Warren Turkett
Colorado River Commission of Nevada
555 E. Washington Ave., Suite 3100
Las Vegas, NV 89101-1065

Subject: Draft Nevada 2012 Integrated Report

Dear Ms. Price and Mr. Turkett:

Thank you for the comments from the Colorado River Commission of Nevada (CRC) on Nevada's Draft 2012 Integrated Report (IR). The Nevada Division of Environmental Protection (NDEP) Bureau of Water Quality Planning (BWQP) appreciates the CRC'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.

1.) NDEP's temperature standard is based on outdated data and contrary to the current Colorado River Basin States and Federal Agency practice of supporting native fisheries.

***NDEP Response:** The temperature water quality standards for the Colorado River below Hoover Dam have not been evaluated since 1985, and NDEP acknowledges that the standards should be reviewed and updated if deemed appropriate. However, NDEP must use the existing standards as currently contained in the Nevada Administrative Code (NAC) to develop the 2012 IR. Please note, both Arizona and California have a beneficial use that protects for cold water aquatic species on the Colorado River, although Nevada is the only state of the three that has site specific temperature criteria.*

2.) The Current State temperature standards are not achievable

***NDEP Response:** As indicated in #1 above, NDEP acknowledges that a review of the Colorado River temperature water quality standards is warranted. NDEP will revisit the appropriateness of protecting for cold-water species in the Nevada portion during the next review of the Colorado River water quality standards. However, NDEP must use the existing standards as currently contained in the NAC to develop the 2012 IR.*

3.) NDEP data is based on a poor representation of samples of the Colorado River

***NDEP Response:** All of the Colorado River temperature data used for the 2012 IR assessment were grab samples. Data from the following agencies were used in the evaluation: United States Geological Survey, United States Bureau of Reclamation, Southern Nevada Water Authority, Metropolitan Water District of Southern California and Big Bend Water District. The temperature water quality standard is expressed by season but not depth.*

If the CRC is aware of additional temperature data, BWQP will be pleased to consider the data during development of the 2014 IR.

Nevada's final 2012 Integrated Report has been submitted to the United States Environmental Protection Agency for approval and is available at <http://ndep.nv.gov/bwqp/303dlist2012.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 Gaskin, P.E., Deputy Administrator, NDEP
Kathy Sertic, Chief, Bureau of Water Quality Planning, NDEP