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STATE OF NEVADA



**COLORADO RIVER COMMISSION  
OF NEVADA**

March 12, 2015

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ENVIRONMENTAL PROTECTION

John Heggeness  
Nevada Division of Environmental Protection  
Bureau of Water Quality Planning  
901 South Stewart Street,  
Suite 4001  
Carson City, NV 89701

Subject: Colorado River Commission of Nevada's Comments on Nevada's Water Quality Standards

Thank you for the opportunity to participate in Nevada's Surface Water Quality Standards workshop held March 3, 2015. The Colorado River Commission of Nevada (CRC) previously submitted comments January 30, 2014 on the 2012 Water Quality Integrated Report. The CRC is concerned that two reaches of the Colorado River violated the temperature standard and consequently were placed on the 303D list for not being beneficial for aquatic life. Although, the temperature standards for these reaches are outdated and support cold water non-native fish, we understand that the 2012 integrated report must follow the standards in the existing Nevada Administrative Code. We are pleased to hear that a workgroup was created to re-evaluate the surface water temperature standards within the State.

The Colorado River below Hoover Dam is designated as critical habitat for the Razorback Sucker and Lake Mohave holds the primary genetic brood stock for all Razorback Suckers. The Razorback Sucker is currently listed as endangered under the Endangered Species Act and classified as Endangered in Nevada. Nevada is a member of the Lower Colorado River Multi Species Conservation Program (LCR MSCP) that works towards the recovery of 26 listed endangered and threatened species under the Endangered Species Act, including the Razorback Sucker.

The CRC appreciates your effort in revisiting the outdated temperature criteria in the Nevada Administrative Code for the Colorado River reaches. We are hopeful you ultimately adopt site specific temperature standards that are in line with the Endangered Species Act and fish and wildlife recovery programs on the Colorado River, including the LCRMSCP, all of which support native endangered populations. Or, in the alternative, we support the removal of the temperature criteria similar to Arizona and California. We believe the current temperature standards are impossible to meet and are contradictory to the recovery efforts that are ongoing for the Razorback Sucker. CRC staff would be happy to participate in temperature standard discussions on the Colorado River group and assist your agency by providing recent scientific literature to ensure any new standard or removal of a current standard is based on the best available scientific knowledge.

Sincerely,

A handwritten signature in blue ink, appearing to read "Warren Turkett".

Warren Turkett  
Natural Resource Analyst

WT/clp