



April 6, 2020

Peggy Roefer  
Environmental Program Manager, Colorado River Commission of Nevada  
555 E. Washington Ave Suite 3100  
Las Vegas, NV 89101

**Subject: Responses to Comments on the Draft Nevada 2016-2018 Integrated Report**

Dear Ms. Roefer:

The Nevada Division of Environmental Protection (NDEP) Bureau of Water Quality Planning (BWQP) received comments made by the Colorado River Commission of Nevada (CRCNV) on the Draft Nevada 2016-2018 Water Quality Integrated Report. BWQP is committed to improving the accuracy of the Water Quality Integrated Report and appreciates your careful review.

BWQP has reviewed the three areas of concern brought to our attention and have addressed them below. All changes have been incorporated into the final Integrated Report.

**CRCNV Comment:** 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.

**BWQP Response.** An erroneous fluoride criterion of 1000/2000 µg/L for irrigation and watering of livestock respectively was applied to Bowman Reservoir. The appropriate criteria of 2600 µg/L has been applied for the protection of the irrigation beneficial use. Assessment for Bowman Reservoir was done with the correct criteria resulting in the continued status of meeting criteria for fluoride.

**CRCNV Comment:** 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.

BWQP Response. These data were collected by SNWA and were indicated as collected from Katherine Cove on Lake Mohave, not as a sample of drinking water. However, follow-up discussions with SNWA found the location of these samples to be mislabeled in the SNWA database. SNWA determined that these samples were actually collected from the Muddy River system, not from Lake Mohave. Removal of the samples in question from the assessment of Lake Mohave resulted in continued attainment of the water quality standard for fluoride.

Additionally, upon a closer examination of these data, it was determined that the data would be inappropriate to include in assessment for the Muddy River because the data represent an irrigation flume of undetermined location.

**CRCNV Comment:** Turbidity at the inflow of the Muddy River at Lake Mead.

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.

BWQP Response. BWQP acknowledges the language in NAC 445A.2152 stating, "*The Commission recognizes that at entrances of tributaries to Lake Mead, localized violations of standards may occur*". This statement applies to Lake Mead where tributaries may influence the lake in their immediate mixing zone. This statement does not apply to the tributaries themselves, nor does it suggest that assessment results be disregarded when they show impairment of the standard. Data assessed for the waterbody described in NAC 445A.2174 (Muddy River at Lake Mead) show turbidity consistently greater than the standard of 50 NTU over time. After careful review of the data from six sampling sites, including 75 measurements of turbidity, from the Wells Siding Diversion to the river mouth at Lake Mead it was determined that removal of the listing for turbidity was not deemed appropriate for the Muddy River (Figure 1).

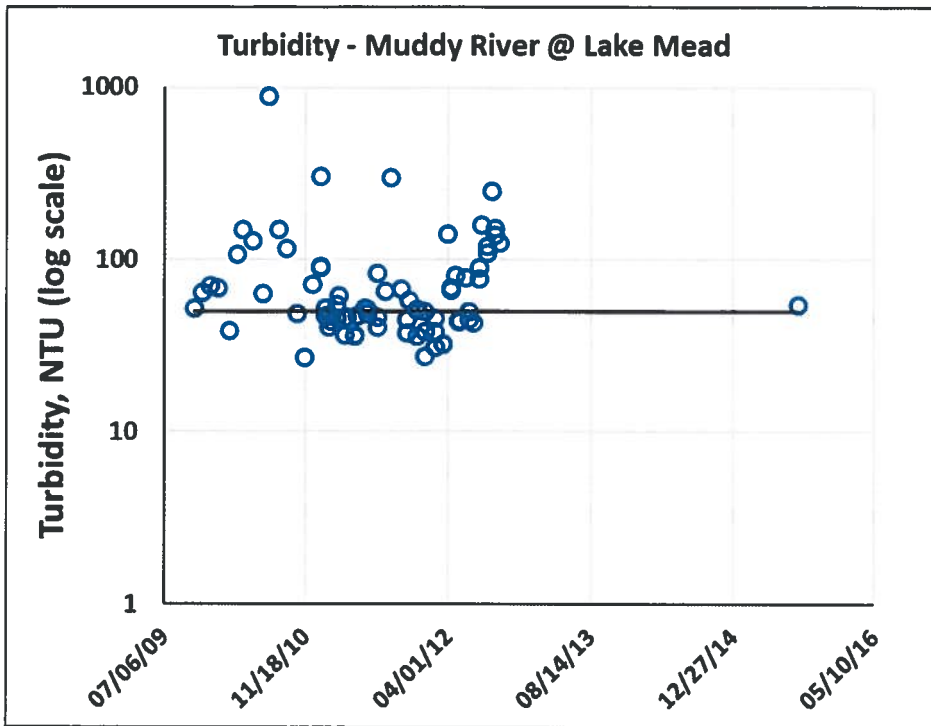


Figure 1. Turbidity data used in assessment of NAC 445A.2174 for the Nevada 2016-2018 Water Quality Integrated Report, with standard of 50 NTU shown.

If you have any questions, please do not hesitate to contact me at (775) 687-9548.

Sincerely,

Dave Simpson, Supervisor  
 Water Quality Standards and Monitoring  
 Bureau of Water Quality Planning

cc: Greg Lovato, Administrator, NDEP  
 Jennifer Carr, P.E., CPM, CEM, Deputy Administrator, NDEP  
 Paul Comba, Chief, Bureau of Water Quality Planning, NDEP