
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

<table>
<thead>
<tr>
<th>Basin</th>
<th>Waterbody Code</th>
<th>Waterbody Name of Impaired Water</th>
<th>Standard Not Meeting</th>
</tr>
</thead>
<tbody>
<tr>
<td>NV13</td>
<td>NV13-CL-23-C_00</td>
<td>Bowman Reservoir</td>
<td>Fluoride IRR</td>
</tr>
<tr>
<td>NV13</td>
<td>NV13-CL-23-C_00</td>
<td>Bowman Reservoir</td>
<td>Fluoride WLS</td>
</tr>
<tr>
<td>NV13</td>
<td>NV13-CL-38_00</td>
<td>Lake Mohave</td>
<td>Fluoride IRR</td>
</tr>
<tr>
<td>NV13</td>
<td>NV13-CL-38_00</td>
<td>Lake Mohave</td>
<td>Fluoride WLS</td>
</tr>
<tr>
<td>NV13</td>
<td>NV13-CL-12_02</td>
<td>Muddy River at Lake Mead</td>
<td>Turbidity SV AQL</td>
</tr>
</tbody>
</table>
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 proefer@crc.nv.gov.

Sincerely,

Peggy Roefer
Environmental Program Manager
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PR/glg

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