

Central Coast Water Quality Preservation, Inc.

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May 19, 2017

Mr. Peter Meertens
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Dear Mr. Meertens,

Thank you for the opportunity to comment on the proposed **Basin Plan Amendment: Updating the Basin Plan Turbidity Water Quality Objective Units of Measurement**. We concur with the Staff Report statement that “JTU measurement methods are outdated and less accurate than NTU measurement methods,” and we support the effort being made to update the turbidity water quality objective to a modern unit of measurement. We also support the selection of “NTU” as the new unit. We are concerned, however, with the conclusion that this is a “non-substantive change.” In short, we feel this conclusion has not been sufficiently documented.

More specifically, we are concerned about changing “JTU” to “NTU” without adequate citation of literature demonstrating the comparability between the two units. On page 11, the Technical Memo attachment mentions that, “The statement by USEPA in the 1983 publication that JTU and NTU are comparable units of turbidity measurement is central to the staff finding that the recommended Basin Plan amendment is a non-substantive change.” In fact, the 1983 USEPA publication cited does *not* discuss similarities or differences between NTU’s and JTU’s. Nor does it discuss or cite any research supporting the statement that NTU’s and JTU’s are similar. It merely states in a note (without providing any citation), that “NTU’s are considered comparable to the previously reported Formazin Turbidity Units (FTU) and Jackson Turbidity Units (JTU).”

We feel strongly that the comparability (and indeed, interchangeability) of JTU’s and NTU’s must be rigorously documented via citation of supporting scientific literature. Absent this, we feel there is nothing to support the conclusion that this is a non-substantive change. We suggest that additional citations and discussion be added to the Technical Memo to address this.

Thank you for your work to update the turbidity objective and for consideration of this comment.

Sincerely,



Sarah G. Lopez
Technical Program Manager
Central Coast Water Quality Preservation, Inc.