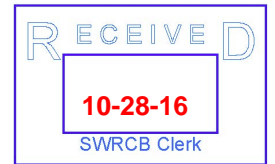


October 31, 2016

Public Comment
Central Coastal Basin Plan Amendment
Deadline: 10/31/16 12:00 noon

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Delivered by email: Commentletters@waterboards.ca.gov

SUBJECT: Comment Letter – Central Coastal Basin Plan Amendment

Thank you for the opportunity to provide comments on the Proposed Amendments to the Central Coastal Basin Plan Amendment released for public comment on September 29, 2016.

The Santa Clara Valley Water District (District) is a special district with jurisdiction throughout Santa Clara County. The District is the county's primary water resources agency and acts as the steward for its watersheds, streams, and creeks.

The Water District has the following comments and clarifications to offer:

- Use of JTU for turbidity measurements: The District conducts water quality monitoring in both the San Francisco Bay Regional Water Quality Control Board area, which uses NTU, as well as the Central Coast Regional Water Quality Control Board. Use of two different methods and the resulting investment in equipment to measure turbidity is impractical for the District. The District would need to invest limited public funds for additional equipment to measure the same pollutant a different way while NTU is a more widely used measure. The State Board deleted use of JTU from the Statewide General Permit for Construction activities in favor of using NTU in the most recent permit reissuance. The Water District encourages the Central Coast Regional Water Quality Control Board to use NTU instead of JTU for turbidity measurements.
- Use of fecal coliform as bacterial indicators: The US EPA has been recommending E.Coli or enterococci as better indicators of health risk from water contact.

Please feel free to contact me at (408) 630-3138 should you have any questions.

Sincerely,



Kirsten Struve
Senior Water Resources Specialist
Environmental Planning Unit

