

**STATE OF CALIFORNIA  
REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL COAST REGION**

**STAFF REPORT FOR REGULAR MEETING OF JULY 13-14, 2017**  
Prepared on April 7, 2017

**ITEM NUMBER:** XX

**SUBJECT:** Amending the *Water Quality Control Plan for the Central Coastal Basin* to Update the Turbidity Water Quality Objective Units of Measurement from Jackson Turbidity Units (JTU) to Nephelometric Turbidity Units (NTU), Resolution No. R3-2017-0014

**STAFF CONTACT:** Peter Meertens (805)549-3869 or  
Peter.Meertens@waterboards.ca.gov

**THIS ACTION:** Adopt Resolution No. R3-2017-0014

**DISCUSSION**

Staff is proposing to amend the *Water Quality Control Plan for the Central Coastal Basin* (Basin Plan) to update the turbidity water quality objective units of measurement from Jackson Turbidity Units (JTU) to Nephelometric Turbidity Units (NTU). JTU measurement methods are outdated and less accurate than NTU measurement methods. JTU measurement methods were developed in the early 1900s and JTU were incorporated in the first 1975 Basin Plan. However in the early 1970s, more precise nephelometric meters and NTU monitoring methods were developed. Early USEPA monitoring protocols used nephelometric turbidity meters and considered JTU and NTU comparable. Eventually however, JTU were eliminated from the USEPA protocol and NTU became the sole unit of measurement (and it remains so today). JTU and NTU measurement methods and units are not equivalent but are comparable. They are both used to measure and evaluate the relative water clarity to natural conditions, which is the basis of the turbidity water quality objective in the Basin Plan.

The Basin Plan is the foundation for regulatory actions taken by the Central Coast Regional Water Quality Control Board (Central Coast Water Board). The Basin Plan is reviewed triennially and updated on a regular basis to assure clarity and usefulness. Since 1995, updating the turbidity water quality objective has been a triennial review priority of the Central Coast Water Board. During the 2014 triennial review, stakeholders commented that the turbidity water quality objective units should be updated from JTU to NTU. No other basin plan in the state still contains the outdated JTU; therefore updating the turbidity water quality objective would make the Basin Plan consistent with the other Regional Boards. Changing the units to NTU will make the turbidity water quality objective equivalent to most other regions in the state.

Monitoring programs in our region already all monitor and report turbidity as NTU. Since the update merely changes the units and does not affect existing regulations, the amendment is considered to be “non-substantive” or “without regulatory effect.” The amendment also does not

result in any physical change in the environment and therefore is not subject to the Water Board's California Environmental Quality Act requirements. The scientific basis of the turbidity water quality objectives remains unchanged and the amendment is not subject to scientific peer review. Finally, since the update does not have any regulatory effect, it is not subject to notice and hearing procedures set forth in the Administrative Procedures Act. However, some conditions of the Administrative Procedures Act still apply, such as submissions of Basin Plan amendments for review by the Office of Administrative Law.

## **CONCLUSION**

Central Coast Water Board staff recommends adoption of Resolution No R3-2017-0014 and the associated Basin Plan amendment. The amendment removes outdated language from the Basin Plan and improves the understanding of the turbidity water quality objective without substantially changing any existing regulations.

## **ATTACHMENTS**

1. Resolution and Basin Plan Amendment
2. Basin Plan Amendment Technical Memo Updating Basin Plan Turbidity Water Quality Objective Units of Measurement

## **RECOMMENDATION**

Adopt Resolution No. R3-2017-0014 as proposed.