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William Ruh  
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William Ruh:

I urge that the board delay a revised total maximum daily load [TMDL] for copper that would impact the use of copper-based anti-fouling paints on boat hulls in Newport Bay until the following essential actions take place:

- A site specific study of Newport Bay has been conducted. This will provide detailed information that is accurate and can serve as the basis for informed scientific decisions.
- The USEPA approves the Biotic Ligand Model [BLM] for determining copper toxicity in salt water. This approval is forthcoming and would facilitate accurate site-specific information regarding Newport Bay.
- Alternatives to copper-based anti-fouling paints are available, affordable and effective. It is critical that recreational vessels have anti-fouling surfaces on their hulls for effective operation and prevention of invasive species.

Based on statements made at the July 28 scoping meeting held by the regional board, there is a significant absence of accurate information regarding Newport Bay, boats in the bay, and copper paint alternatives. The requested actions are essential to provide the information that will inform decisions that will protect the environment and preserve recreational boating.

Sincerely,  
Mark Rinkel