

---

## North Coast Regional Water Quality Control Board

**Response to Written Comments  
Draft Waste Discharge Requirements  
Order No. R1-2026-0014  
National Pollutant Discharge Elimination System (NPDES)  
for the  
California State Polytechnic University, Humboldt  
Telonicher Marine Laboratory  
Regional Water Quality Control Board, North Coast Region  
May 7-8, 2026**

### Comments Received

The deadline for submittal of public comments regarding draft Waste Discharge Requirements and National Pollutant Discharge Elimination System (NPDES) Permit, Order No. R1-2026-0014 (Draft Permit) for the California Polytechnic State University, Humboldt (Permittee or University) Telonicher Marine Laboratory (Facility) was February 13, 2026. Regional Water Board staff (Staff) received written comments from the Permittee during the Draft Permit's public comment notification period.

This Response to Comments document includes a summary of the comments received from the Permittee, followed by Staff's response to each comment. Text added to the Proposed Permit is identified by underline, and text to be deleted from the Proposed Permit is identified by strike-through in this document. The term "Draft Permit" refers to the version of the permit that was sent out for public comment. The term "Proposed Permit" refers to the version of the permit that has been modified in response to comments received and is being presented to the North Coast Regional Water Quality Control Board (Regional Water Board) for consideration.

### University Comment Letter

#### Comment No. 1:

The Permittee explained that they anticipate more frequent and longer duration backwashes to maintain water quality objectives. Accordingly, they provided an updated description of sand filter operations, discharge volume, and discharge frequency. The Permittee further confirmed that discharge volumes do not exceed the maximum daily discharge of 123,232 gallons per day of combined seawater discharge.

**Response to Comment No. 1:**

Sections 2.5 of the Order and Section 2 of the Factsheet were revised in the Proposed Order to correct the facility operations description as shown below.

Section 2.5 of the Proposed Order

Sand filters are backwashed one to two times per month, resulting in roughly 7,000 to 15,000 gallons of filter backwash water. ~~Sand filters are backwashed approximately every other month, resulting in roughly 3,000 to 4,000 gallons of filter backwash water.~~

The same language is corrected in Section 2 of Attachment F- Factsheet

Sand filters are backwashed one to two times per month, resulting in roughly 7,000 to 15,000 gallons of filter backwash water. ~~Sand filters are backwashed approximately every other month, resulting in roughly 5,000 to 9,000 gallons of filter backwash water.~~

**Comment No. 2:**

The Permittee provided updated facility contact information and the authorized person to sign and submit reports.

**Response to Comment No. 2:**

Section 1 of the Factsheet, Table F-1 was revised as shown below.

**Table 0-1. Facility Information**

<b>WDID</b>	1B12187NHUM
<b>Permittee</b>	California Polytechnic University, Humboldt
<b>Name of Facility</b>	Telonicher Marine Laboratory
<b>Facility Address</b>	570 Ewing Street, <u>Trinidad, CA 95570, Humboldt County</u>
<b>Facility Contact, Title and Phone</b>	<u>Eric Bjorkstedt, Director of Marine Operations, (707) 826-3688 Trinidad, CA 95570</u>
<b>Authorized Person to Sign and Submit Reports</b>	<u>Christina Koczera, Director of Risk Management &amp; Safety, (707) 826-4635 Humboldt County</u>
<b>Mailing Address</b>	<u>1 Harpst Street, Suite 311, Arcata, CA 95521</u> Sabrina Zink, Environmental Health & Safety Specialist, (707) 826-3302
<b>Billing Address</b>	<u>1 Harpst Street, Suite 311, Arcata, CA 95521</u> Sabrina Zink, Environmental Health & Safety Specialist, (707) 826-3302

<b>Type of Facility</b>	<u>Marine Laboratory</u> 1 Harpst Street, House #13, Arcata, CA 95521
<b>Major or Minor Facility</b>	<u>Minor</u> Marine Laboratory
<b>Threat to Water Quality</b>	<u>3</u> <del>Minor</del>
<b>Complexity</b>	<u>C-3</u>
<b>Pretreatment Program</b>	<u>Not Applicable</u> <del>C</del>
<b>Recycling Requirements</b>	Not Applicable
<b>Facility Permitted Flow</b>	<u>123,232 gallons per day (gpd)</u> <del>Not Applicable</del>
<b>Facility Design Flow</b>	<u>Semi-open recirculating system</u> 123,232 gallons per day (gpd)
<b>Watershed</b>	Humboldt Watershed Management Area (WMA)
<b>Receiving Water</b>	Pacific Ocean
<b>Receiving Water Type</b>	Ocean Waters

**Comment No. 3:**

The Permittee provided an updated description of intake pump operations and capacity.

**Response to Comment No. 3:**

Sections of the Factsheet was revised in the Proposed Order to correct facility operations description as shown below.

“The intake pump has a capacity of 1,400 gallons per hour, depending on the tide and operates ~~six to eight~~ 12 to 15 times per year for 2 to 6 hours at a time.”

**Comment No. 4:**

The Permittee clarified that Monitoring Location EFF-001B is two locations. The Permittee further explained that samples are taken separately following the sump and following the storage tanks.

**Response to Comment No. 4:**

After discussing these discharge locations further with the Permittee, it was determined that these discharges are at separate locations. However, the effluent is effectively the same at both locations because the seawater continuously recirculates through the treatment system.

Section 2 of the Monitoring and Reporting Program (MRP), Table E-1 have been revised to provide a more accurate description of the monitoring locations.

**Table E-1. Monitoring Station Locations**

Discharge Point Name	Monitoring Location Name	Monitoring Location Description
001	EFF-001B <sup>1,2</sup>	Waste seawater monitoring immediately following the seawater storage tanks or seawater sump. Monitoring is only required if the storage tanks or sump are drained to the seawater outfall during the permit term.

**Table Notes**

2. Sample collection following the seawater storage tanks or seawater sump are in two distinct locations. Since the waste seawater is continuously recirculated through the treatment and storage system, these locations are considered the same discharge and a single monitoring point.

**Staff Initiated Changes**

The following sections describe changes made to the draft Order, initiated by Regional Water Board staff to update and simplify the Proposed Permit. The modified sections are identified by their section numbers as indicated in the Proposed Order. The proposed changes do not materially impact the Permittee or substantively modify permit requirements.

Section 3.12.3, 3.12.4, and 3.12.5 were removed from the Draft Permit for simplicity and clarity. These prohibitions are considered duplicative, as the associated prohibitions are already addressed by effluent limitations and monitoring for turbidity, total settleable solids, and toxicity. Section 6.4.3 of the Draft Permit also requires a Sediment Monitoring Study that addresses settleable material deposits.

3.12. The discharge of water containing the following substances is prohibited:

- 3.12.1. Visible oil and grease;
- 3.12.2. Material that is floatable or will become floatable upon discharge;
- 3.12.3. ~~Settleable material or substances that may form sediments which will degrade benthic communities or other aquatic life;~~
- 3.12.4. ~~Substances which will accumulate to toxic levels in marine waters, sediments or biota;~~
- 3.12.5. ~~Substances that significantly decrease the natural light to benthic communities and other marine life;~~
- 3.12.6. Aesthetically undesirable color or materials