

San Diego Regional Water Quality Control Board  
2375 Northside Drive, Suite 100  
San Diego, CA 92018  
Attn: Ms. Michelle Mata  
February 5, 2015

Subject: Triennial Review Comment –

Dear Ms. Mata:

I ask that the Regional Board consider specific recommendations made by the Department of Pesticide Regulation (DPR) after an evaluation of copper paints and incorporate these findings from AB 425 and DPR into assessments of copper impacts.

Taking findings generated at the state level, and applying it locally impacted waters is a reasonable, protective, and efficient action.

The effort of dealing with copper piecemeal is substantial. Numerous local waters are identified as impaired from copper: in addition to the TMDL for Shelter Island, seven other San Diego Bay marina basins are also listed as 303(d) impaired waters from high dissolved copper levels. Many other Southern California marina basins, including Mission Bay, Dana Point Harbor, Huntington Harbor, Newport Bay, and Marina Del Rey, have similar issues.

Findings indicate that the use of new leach rates paints will substantially reduce copper in the water. The study has been reviewed, published and reported to the state legislature.

The Port of San Diego sponsored bill, AB 425 directed the DPR to reevaluate hull paints and establish leach rates and mitigation measures that protect aquatic environments from the effects of copper paints. The DPR completed its report in February 2014, identifying new leach rates for copper paints along with several mitigation measures.

Please consider recommendations from AB425 a high priority in this Basin Plan review process.

Sincerely,



John Adriany

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