

Comment letter October 15th 2016 to
California Regional Water Quality Board, Santa Ana Region

October 16, 2016

Attn. Linda Candelaria, PHD

With respect to the proposed regulations concerning the use of copper based anti-fouling paints in Newport Harbor I wish to make the following comments.

First I will defer to the city of Newport's review of the legal and technical aspects of the issue. The analysis they have provided in their letter is very comprehensive.

Second from a boat owners viewpoint I feel this is an example of the government's desire to let the carriage proceed before the horse. There is no realistic alternative to ablative copper based anti-fouling coatings for use in the marine industry. Elimination of copper would have several negative impacts. Increased growth of marine organisms on submerged services would lead to decreased fuel efficiency and a greater carbon footprint for marine user groups. This would be in direct contradiction to the State of California's mandate to reduce carbon emissions. Also, many vessels in Newport Harbor are constructed of wood. These vessels are subject to damage from invasive marine organisms like shipworms if a proper barrier of copper based paint is not in place to prevent the intrusion of these organisms. Finally, thru-hulls and associated screens which provide water to engine cooling systems could be compromised. In the case of passenger vessels inspected by the US Coast Guard and marine support organizations like the Coast Guard, fire departments and harbor police this would further complicate the issue.

For these reasons I strongly urge you to reconsider any action you take on this issue.

Sincerely,



Mike Thompson Vice President,
Newport Landing Sportfishing