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Corona del Mar, CA 92625

October 20, 2016

Linda Candelaria, PhD
California Regional Water Quality Control Board, Santa Ana Region
3737 Main Street, STE 500
Riverside, CA 92501-3348

Re: Basin Plan Amendments to Incorporate Total Maximum Daily Loads for Copper and Non-TMDL Action Plans for Other Metals in Newport Bay

I am a resident of the City of Newport Beach and I own a boat moored in Newport Harbor. I am also the current Chairman of the Newport Beach Harbor Commission although I am not writing on behalf of that Commission.

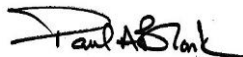
The City of Newport Beach has prepared a well-crafted letter in response to the proposed Basin Plan Amendments related to Copper TMDLs. I fully support the City's arguments against the proposed amendments at this time.

In addition, I offer my own experience (anecdotal evidence) in attempting to get ahead of the proposed changes. Representing users of the harbor as I do, I felt compelled to become familiar with and make use of alternative, non-copper based antifouling paint on the bottom of my 38' powerboat moored in Newport Harbor. Twice I have used the current, best available non-copper based antifouling paint. Twice those paints have failed to be effective requiring me to have the boat repainted much sooner than expected. Further, in both cases, the paint itself was more expensive than the copper-based paints and the application of the non-copper based paints was more expensive than the application of the paint previously used on my boat. Specifically:

Year	Non-copper based Paint			Traditional Paint		
	Application Cost	Cost/gallon	Length of Service	Application Cost	Cost/gallon	Cost/gallon
2014	\$ 3,200	\$ 229	7 months	\$ 2,400	\$ 179	18 months
2016	\$ 3,600	\$ 299	3 months	\$ 2,600	\$ 199	18 months (est.)

Said simply, my experience using non-copper based anti-fouling paint has been negative because it is expensive and ineffective.

Sincerely,



Paul Blank