

Port of San Diego
In-Water Hull Cleaning Public Workshops
October 2 and 3, 2019

| Comment Number | Topic | Comment | Port Comment |
|----------------|----------|---|--|
| 1 | 1 (BMPs) | Ablative Paint do not need to be cleaned | Comment addressed. At this time, the District is proposing that the cleaning of ablative paints will no longer be permitted. |
| 2 | 1 (BMPs) | No one cleans ablative paints | The District has taken this comment into consideration has conducted additional research with boatyards and divers regarding the use of ablative paint. Based on those discussions and the limited use of ablative paints, the District is proposing that the cleaning of ablative copper antifouling paints be prohibited. |
| 3 | 1 (BMPs) | Companies have already have provided Port BMP plans - why the need to keep doing so | Comment noted. BMP Plans will no longer be required. As outlined in the draft Ordinance, standardized BMPs and mandatory training will be required, rather than individual BMP Plans. |
| 4 | 1 (BMPs) | Public education of boaters: what is the proposal to educate the boater? | The District finds that Individual Vessel Owners have a responsibility to adhere to the requirements and do their part in improving water quality. The draft Ordinance is proposing requirements for individual vessel owners relating to paint identification following the application of hull paint. Such tracking provisions include the receipt of a paint application certificate and sticker to be applied to the vessel that will clearly identify the paint type. In this manner, it is anticipated that boater education will be improved. The District is also proposing to hold regular outreach events throughout the implementation of the Ordinance to educate boaters on the new rules and increase awareness of proper paint use and maintenance. |
| 5 | 1 (BMPs) | After 8-9 days, carpet won't work for growth; above 65 degrees and hard growth tears up soft carpets; however you don't see that kind of growth on newer paints | The District has considered the concerns related to cleaning methods, frequencies and tools, and values the input of the hull cleaning community. At this time the District is proposing to align frequency requirements with the California Department of Pesticide Regulation for monthly cleaning. However, the District is also proposing the use of microfiber cloth and white pads as cleaning materials in addition to soft carpet. Additionally, plastic scrapers will be permitted in situations where growth warrants their use, as long as no plumes and paint removal occur. |
| 6 | 1 (BMPs) | Carpet material tears easily becomes ineffective. Especially in summer months and with older paints | The District has considered the concerns related to cleaning methods, frequencies and tools, and values the input of the hull cleaning community. At this time the District is proposing to align frequency requirements with the California Department of Pesticide Regulation for monthly cleaning. However, the District is also proposing the use of microfiber cloth and white pads as cleaning materials in addition to soft carpet. Additionally, plastic scrapers will be permitted in situations where growth warrants their use, as long as no plumes and paint removal occur. |
| 7 | 1 (BMPs) | Is there an alternative to carpet? | The District has considered the concerns related to cleaning methods, frequencies and tools, and values the input of the hull cleaning community. At this time the District is proposing to align frequency requirements with the California Department of Pesticide Regulation for monthly cleaning. However, the District is also proposing the use of microfiber cloth and white pads as cleaning materials in addition to soft carpet. Additionally, plastic scrapers will be permitted in situations where growth warrants their use, as long as no plumes and paint removal occur. |
| 8 | 1 (BMPs) | More frequent cleaning with less abrasive materials would lessen impact. | Comment addressed. The District supports the use of less abrasive techniques. The District is proposing to align with the California Department of Pesticide Regulation's recommendation of monthly cleaning. However, the District is also proposing that more abrasive materials such as brown and green pads and mechanical brushes will no longer be allowed for the cleaning of copper antifouling paints or coatings. |

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| 9 | 1 (BMPs) | Take into account seasonal changes and effects on growth. More growth in summer means more cleanings required in summer months. Keep to 12 times/year, not one time per month. | The District has considered the concerns related to cleaning methods, frequencies and tools, and values the input of the hull cleaning community. At this time the District is proposing to align frequency requirements with the California Department of Pesticide Regulation for monthly cleaning. However, the District is also proposing the use of microfiber cloth and white pads as cleaning materials in addition to soft carpet. Additionally, plastic scrapers will be permitted in situations where growth warrants their use, as long as no plumes and paint removal occur. |
| 10 | 1 (BMPs) | More frequent cleaning allows for less abrasive material to be used because of less growth. | The District has considered the concerns related to cleaning methods, frequencies and tools, and values the input of the hull cleaning community. At this time the District is proposing to align frequency requirements with the California Department of Pesticide Regulation for monthly cleaning. However, the District is also proposing the use of microfiber cloth and white pads as cleaning materials in addition to soft carpet. Additionally, plastic scrapers will be permitted in situations where growth warrants their use, as long as no plumes and paint removal occur. |
| 11 | 1 (BMPs) | More frequency using less abraive material and less pressure | The District has considered the concerns related to cleaning methods, frequencies and tools, and values the input of the hull cleaning community. At this time the District is proposing to align frequency requirements with the California Department of Pesticide Regulation for monthly cleaning. However, the District is also proposing the use of microfiber cloth and white pads as cleaning materials in addition to soft carpet. Additionally, plastic scrapers will be permitted in situations where growth warrants their use, as long as no plumes and paint removal occur. |
| 12 | 1 (BMPs) | As a diver, regularly clean boats 2x/mo with paint jobs that are 8-9 years old using proper methods. | The District has considered the concerns related to cleaning methods, frequencies and tools, and values the input of the hull cleaning community. At this time the District is proposing to align frequency requirements with the California Department of Pesticide Regulation for monthly cleaning. However, the District is also proposing the use of microfiber cloth and white pads as cleaning materials in addition to soft carpet. Additionally, plastic scrapers will be permitted in situations where growth warrants their use, as long as no plumes and paint removal occur. |
| 13 | 1 (BMPs) | 4-5 year lifespan for clients using proper methods | The District is proposing new BMP requirements addressing frequency and tools that should allow for less abrasive methods being utilized during a cleaning, thus supporting longer periods between hauling out. |
| 14 | 1 (BMPs) | Increased frequency with least abrasive cleaning lengthens paint life and the boatyards are mad about it. | The District is proposing new BMP requirements addressing frequency and tools that should allow for less abrasive methods being utilized during a cleaning, thus supporting longer periods between hauling out. |
| 15 | 1 (BMPs) | With 1x/month cleaning, with harder growth paint will come off | The District has considered the concerns related to cleaning methods, frequencies and tools, and values the input of the hull cleaning community. At this time the District is proposing to align frequency requirements with the California Department of Pesticide Regulation for monthly cleaning. However, the District is also proposing the use of microfiber cloth and white pads as cleaning materials in addition to soft carpet. Additionally, plastic scrapers will be permitted in situations where growth warrants their use, as long as no plumes and paint removal occur. |
| 16 | 1 (BMPs) | I have been cleaning for 24 years. More frequency with the least abrasive material results in hauling out every 3-6 years versus 18 months | The District is proposing new BMP requirements addressing frequency and tools that should allow for less abrasive methods being utilized during a cleaning, thus supporting longer periods between hauling out. The frequency for cleaning will be aligned with the California Department of Pesticide Regulation for monthly cleaning. |

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| 17 | 1 (BMPs) | What if cleaning one time a month does not work? | The Ordinance amendment that is being undertaken is intended to be an iterative process and will be re-evaluated in the coming year to determine if these actions are adequate to improve water quality. Regular water quality monitoring will be conducted throughout the year to evaluate the effectiveness of Ordinance amendments in reaching water quality requirements. Should proposed measures not achieve water quality requirements, additional changes may be proposed to the Board of Port Commissioners. |
| 18 | 1 (BMPs) | Need to clean more aggressive on older paints | The District disagrees with this comment. The District supports the use of less abrasive cleaning techniques. At this time the District is proposing to align frequency requirements with the California Department of Pesticide Regulation for monthly cleaning. However, the District is also proposing the use of microfiber cloth and white pads as cleaning materials in addition to soft carpet. If cleaning under these conditions does not remove the growth on older paints, boat owners should be encouraged to consider repainting their boat. |
| 19 | 1 (BMPs) | The TMDL Data shows that what we are currently doing does not work. Something has to change. | The District agrees that more aggressive load reduction approaches that directly reduce the amount of copper getting into the water are needed to improve water quality. The amended draft Ordinance and Permit are designed to further address water quality impairments by placing more restrictive limitations on the in-water hull cleaning of vessels, and by tracking paint use from the boatyards. In addition, quarterly water quality monitoring will be conducted to determine if the revisions are effective in achieving water quality standards. |
| 20 | 1 (BMPs) | Augmented schedule is desired, inclusion of a Hull Management Plan | At this time, the District is proposing to align the BMPs and cleaning requirements with the California Department of Pesticide Regulation, a state agency, and include specific BMP standards into the Ordinance. The District would certainly encourage any proactive implementation practices the marina owners/managers would undertake to become more involved in direct load reduction strategies within their own facilities such as the implementation of hull management plans. However, this concept is not proposed as part of the Ordinance amendment, nor would it be led by the District. |
| 21 | 1 (BMPs) | Commenter disagrees that mechanical methods keep boats out of boatyards, increases lifespan and is less abrasive | The District has proposed that mechanical methods are no longer allowed for the cleaning of hulls painted with copper antifouling paints or coatings. |
| 22 | 1 (BMPs) | Send into yard because mechanical method is easier and less abrasive than soft pile carpet | The District encourages boaters to haul out to clean their hulls. The draft Ordinance and Permit requirements related to mechanical methods are specific to cleaning of copper-based antifouling paints or coatings. |
| 23 | 1 (BMPs) | Would not be using rotary brushes if they were destroying bottom paint. Commenter then read a memo he wrote. | The District disagrees with this comment and it is being proposed that mechanical methods are no longer allowed for the cleaning of hulls painted with copper-based antifouling paints or coatings. |
| 24 | 1 (BMPs) | Mechanical methods should still be allowed on metal parts only | New proposed requirements are to be applied to in-water hull cleaning of the hull of a vessel. It does not apply to the metals or other underwater components of a vessel. |
| 25 | 1 (BMPs) | Rotary brush use is in the best interest of the divers and boat owners. It allows for the preservation of bottom paint. Less pressure is applied, and cleaning is 100% effective. Weight is dispersed evenly. | The District disagrees with this comment and it is being proposed that mechanical methods are no longer allowed for the cleaning of hulls painted with copper-based antifouling paints or coatings. |
| 26 | 1 (BMPs) | Mechanical method keep boats out of boatyards, increases lifespan, and is less abrasive | The District disagrees with this comment and it is being proposed that mechanical methods are no longer allowed for the cleaning of hulls painted with copper-based antifouling paints or coatings. |

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| 27 | 1 (BMPs) | Brand new paints leach more | The District is proposing that newly painted copper hulls are not cleaned for a minimum of 3 months after date of application. In addition is it important to note that the choice of when to paint remains with the Individual Vessel Owner. The District is not regulating the painting frequency at this time. |
| 28 | 1 (BMPs) | How are paints being tracked? Lengthen paint longevity. | The proposed draft Ordinance requires boatyard or boat maintenance and repair facilities to keep a log of annual hull paint use, affix a sticker to vessels identifying the hull paint and date of painting, as well as provide a certificate to boaters. The choice of when to repaint remains with the individual vessel owner. The District is not regulating the painting frequency at this time. |
| 29 | 1 (BMPs) | Paints are inert after 30 months. | The proposed draft Ordinance is not addressing the frequency in which boaters choose to paint their boats. The choice of when to repaint remains with the individual vessel owner. The District is not regulating the painting frequency at this time. |
| 30 | 1 (BMPs) | Frequency of cleaning should be determined by paint age | At this time the District is proposing to align with the California Department of Pesticide Regulation's recommendation of monthly cleaning for copper-based antifouling paints or coatings of all ages. |
| 31 | 1 (BMPs) | Limit the number of boats allowed to be repainted results in much less copper in the bay | The proposed draft Ordinance is not addressing the frequency in which boaters choose to paint their boats. The choice of when to repaint remains with the individual vessel owner. The District is not regulating the painting frequency at this time. |
| 32 | 1 (BMPs) | BMP should include the frequency of painting | The proposed draft Ordinance is not addressing the frequency in which boaters choose to paint their boats. The choice of when to repaint remains with the individual vessel owner. The District is not regulating the painting frequency at this time. |
| 33 | 1 (BMPs) | Consideration for boat racing/sailing. Desire to clean for performance and before races will conflict with scheduled monthly cleaning. | The proposed regulations will apply to everyone, including racing boats. Those boaters concerned with limiting cleaning for racing and sailing are encouraged to explore non-copper alternatives, slip liners or consider out of water cleaning, as updated regulations apply only to copper-based antifouling paints or coatings. |
| 34 | 1 (BMPs) | Racing needs more. One time a month can cause chaos is every boat needs to be cleaned the same day. As a boater, I want to be conscientious of less fuel consumption. Maybe we do twice in one month. Very sad to see the option of more then once a month go away. Is my extra cleaning really affecting water quality? | The proposed regulations will apply to everyone, including racing boats. Those boaters concerned with limiting cleaning for racing and sailing are encouraged to explore non-copper alternatives, slip liners or consider out of water cleaning, as updated regulations apply only to copper-based antifouling paints or coatings. |
| 35 | 1 (BMPs) | BMP Plans should be audited | The District is proposing that BMP Plans will no longer be required, but standardized BMPs as well as mandatory training will be required for each permittee. Such records are required to be maintained for the length of the permit plus 90 days. In addition, the District intends to conduct record audits of Permittees, marinas and yacht clubs, and boatyards to verify tracking records. |
| 36 | 1 (BMPs) | Paints leach differently at different stages of life. DPR empirical snapshot did not follow full lifecycle | The California Department of Pesticide Regulation study is regarded as the best available science regarding leach rates. Stakeholders are encouraged to pursue additional research to answer data gaps or support alternative conclusions. |
| 37 | 1 (BMPs) | SPAWAR 90 Day study a faulty study | The California Department of Pesticide Regulation study is regarded as the best available science regarding leach rates. Stakeholders are encouraged to pursue additional research to answer data gaps or support alternative conclusions. |

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| 38 | 1 (BMPs) | Single BMP plan that everyone follows, create BMPs specific to each paint type | The District agrees with the need for standardization. At this time, the District proposes to standardize training requirements by requiring all training to be conducted by a Port-contracted service provider with knowledge and specialization in cleaning the various types of paint used locally in the San Diego region. |
| 39 | 1 (BMPs) | Default to DPR recommendations of BMPs, including materials to use and frequency of cleanings. Have one standard for all Divers/Dive Companies to use | The District agrees with the concept of standardization and alignment with the state. The District is proposing to align with the California Department of Pesticide Regulation's recommendation of monthly cleaning and has identified a set of BMP standards and cleaning restrictions in the draft Ordinance. The same standard will be applicable for everyone conducting in-water hull cleaning. |
| 40 | 1 (BMPs) | Grant for training to keep costs down | The District is proposing to provide training conducted by a Port-contracted service provider with knowledge and specialization in cleaning the various types of paint used locally in the San Diego region. Costs for this training will be covered by the District. |
| 41 | 1 (BMPs) | BMP Plans creates better divers. Training is essential. Having an informed hull cleaner is huge | Comment addressed. Standard BMPs have been outlined in the amended draft Ordinance, thus eliminating the need for non-standardized BMP plans. Further, it is proposed that training will be conducted by Port-contracted service providers with knowledge and specialization in the cleaning of various types of paints used locally in the San Diego region. |
| 42 | 1 (BMPs) | Need education for divers endorsed by the state | Comment addressed. It is proposed that prior to obtaining a Permit or Diver Identification Card, all persons must attend training by a Port-contracted service provider. To the District's knowledge, there currently is no state-certified training program for hull cleaning. |
| 43 | 1 (BMPs) | Companies need to do their own training and need to verify and audit the programs | At this time, the District is proposing requiring mandatory training provided by a Port-contracted service provider. Additionally, the District reserves the right to audit records of any boatyard, marina or In-Water Hull Cleaning company at any time. The development of individualized training programs is no longer included in the proposed Ordinance and Permit revisions. |
| 44 | 1 (BMPs) | Lack of education on multiple paints | Comment noted. At this time, the District is proposing to provide training conducted by a Port-contracted service provider with knowledge and specialization in cleaning the various types of paint used locally in the San Diego region. |
| 45 | 1 (BMPs) | Are BMP actions and people's choices making an effect on Water Quality? | The Ordinance amendment that is being undertaken is intended to be an iterative process and will be re-evaluated in the coming year to determine if these actions are adequate to improve water quality. Regular water quality monitoring will be conducted throughout the year to evaluate the effectiveness of Ordinance amendments in reaching water quality requirements. Should proposed measures not achieve water quality requirements, additional changes may be proposed to the Board of Port Commissioners. |
| 46 | 1 (BMPs) | How does introduction of BMP Plans correlate to WQ Data | The Ordinance amendment that is being undertaken is intended to be an iterative process and will be re-evaluated in the coming year to determine if these actions are adequate to improve water quality. Regular water quality monitoring will be conducted throughout the year to evaluate the effectiveness of Ordinance amendments in reaching water quality requirements. Should proposed measures not achieve water quality requirements, additional changes may be proposed to the Board of Port Commissioners. |
| 47 | 2 (Permit Issuance) | Port does a great job corresponding on the administrative end | Comment noted and feedback appreciated. |

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| 48 | 2 (Permit Issuance) | Make renewing permits easier and more streamlined | Comment addressed. District staff that process the administrative aspects of IWHC requirements will be educated on changes to the draft Ordinance and Permit to make the vetting and review process easier. In addition, the District believes that the removal of the BMP Plan development requirement for individual businesses should streamline the process. |
| 49 | 2 (Permit Issuance) | Have a vetting process to check qualifications of those applying for IWHC Permit | Comment addressed. District staff that process the administrative aspects of IWHC requirements will be educated on changes to the draft Ordinance and Permit to make the vetting and review process easier. In addition, the District believes that the removal of the BMP Plan development requirement for individual businesses should streamline the process. |
| 50 | 2 (Permit Issuance) | First time application process is ok, make repplication shorter and allow online or by mail | Comment addressed. The District is looking into various approaches to streamline the application and renewal process. The District will be evaluating the feasibility of an online application process, however this online component will not be available until next fiscal year. |
| 51 | 2 (Permit Issuance) | Establish an effective correspondence with administrative aspect of Permit Issuance | Comment addressed. District staff that process the administrative aspects of IWHC requirements will be educated on changes to the draft Ordinance and Permit to make the vetting and review process easier. In addition, the District believes that the removal of the BMP Plan development requirement for individual businesses should streamline the process. |
| 52 | 2 (Permit Issuance) | Check what other Ports do | Comment addressed. The District reached out to other jurisdictions that are experiencing similar copper impairments to further discuss how other regulated entities are addressing copper impairments. Adjustments in the draft Ordinance and Permit reflect those findings related to enforcement and training. |
| 53 | 2 (Permit Issuance) | Issue of Insurance Liability. Company vs Individual Divers | At this time, the District is proposing to require general liability insurance for all Businesses and Independent Contractors at a minimum of \$1,000,000 per occurrence for property damage and bodily injury for permitted businesses. Businesses would be responsible for insurance and liability of their employees. |
| 54 | 2 (Permit Issuance) | Businesses need to reclassify their subcontractors as employees per AB5 | Comment noted. The state oversees the enforcement of AB5. At this time the proposed draft Ordinance requires that all Persons adhere to all applicable laws, rules and regulations. It is anticipated that any new provisions in AB5 would fall into this requirement. |
| 55 | 2 (Permit Issuance) | The Port needs to get it right this time, do not want to go through changes to permit and/or Ordinance process again | The Ordinance amendment that is being undertaken is intended to be an iterative process and will be re-evaluated in the coming year to determine if these actions are adequate to improve water quality. Regular water quality monitoring will be conducted throughout the year to evaluate the effectiveness of Ordinance amendments in reaching water quality requirements. Should proposed measures not achieve water quality requirements, additional changes may be proposed to the Board of Port Commissioners. |
| 56 | 2 (Permit Issuance) | Lower permit fees | At this time, it is proposed that Permit fees will remain at \$250. |
| 57 | 2 (Permit Issuance) | \$150 for the permit | At this time, it is proposed that Permit fees will remain at \$250. |
| 58 | 2 (Permit Issuance) | Increasing costs for permitting fees could keep businesses more legitimate and offer the incentive or more investment | At this time, it is proposed that Permit fees will remain at \$250. |

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| 59 | 2 (Permit Issuance) | Other municipalities do not have fees associated with permitting | At this time, it is proposed that Permit fees will remain at \$250. |
| 60 | 2 (Permit Issuance) | Fees are appropriate | Comment noted, the feedback is appreciated. |
| 61 | 2 (Permit Issuance) | Other municipalities do not charge fees but have to prove they have training. It is easy for those to follow rules and it works. | At this time, it is proposed that Permit fees will remain at \$250. Additional training requirements are being proposed in the draft permit, requiring standardization of training rather than individual BMP plans for businesses. |
| 62 | 2 (Permit Issuance) | If companies are more invested in the Permit and there was a course offered by the Port, it will make a more permanent, standardized training. Bring a scientist in to do it. | At this time, the District proposes to provide training conducted by a Port-contracted service provider with knowledge and specialization in cleaning the various types of paint used locally in the San Diego region. The selection process will be open for bid; anyone can apply to become the contracted service provider provided they train on the BMPs contained in the Ordinance, when adopted. |
| 63 | 2 (Permit Issuance) | The Port should offer a course in training to standardize the training process | At this time, the District proposes to provide training conducted by a Port-contracted service provider with knowledge and specialization in cleaning the various types of paint used locally in the San Diego region. The selection process will be open for bid; anyone can apply to become the contracted service provider provided they train on the BMPs contained in the Ordinance, when adopted. |
| 64 | 2 (Permit Issuance) | Have some qualification standard | The District agrees with the need for standardization. At this time, the District proposes to standardize training requirements by requiring all training to be conducted by a Port-contracted service provider with knowledge and specialization in cleaning the various types of paint used locally in the San Diego region. |
| 65 | 2 (Permit Issuance) | Business owners don't typically dive | Comment noted. The District reminds all permitted business owners that they agree to all Terms and Conditions outlined in the Permit, on behalf of both their business and employees, agents and/or representatives. Even if a business owner is not diving, they are ultimately responsible for violations of the Permit and/or Ordinance. |
| 66 | 2 (Permit Issuance) | Training Permit process needs to have a designated trainer which would allow divers in training to enter waters | The draft Permit proposes language addressing a "Trainer-of-Record". That is, a permittee may identify one employee as the Trainer-of-Record who must accompany trainee at all times underwater and will be responsible for adherence to all Permit-related activities of the trainee. Only a single trainee is permitted to conduct in-water hull cleaning with the "Trainer-of-Record" at a time. |
| 67 | 2 (Permit Issuance) | Provide a Training Permit to assist training new divers | The draft Permit proposes language addressing a "Trainer-of-Record". That is, a permittee may identify one employee as the Trainer-of-Record who must accompany trainee at all times underwater and will be responsible for adherence to all Permit-related activities of the trainee. Only a single trainee is permitted to conduct in-water hull cleaning with the "Trainer-of-Record" at a time. |
| 68 | 2 (Permit Issuance) | Hard to get trained- big process to get a Permit and a card. Many new divers end up leaving and not liking the work until they know how it works. Need a "buddy pass" for training. | The draft Permit proposes language addressing a "Trainer-of-Record". That is, a permittee may identify one employee as the Trainer-of-Record who must accompany trainee at all times underwater and will be responsible for adherence to all Permit-related activities of the trainee. Only a single trainee is permitted to conduct in-water hull cleaning with the "Trainer-of-Record" at a time. A trainee will not be able to operate as an independent in-water hull cleaner until all of the training requirements in the Permit have been satisfied. |

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| 69 | 2 (Permit Issuance) | Business and Diver should have permit | At this time, it is proposed that Businesses and Independent Contractors will be required to possess valid permits. Any employee, agent, or representative of the company performing in-water hull cleaning on behalf of the permitted business will be required to possess a valid Diver Identification Cards. |
| 70 | 2 (Permit Issuance) | Have individual Diver IDs numbered | While at this time a numbering system will not be utilized, it is proposed that Permittees be required to return Diver Identification Cards from employees and agents no longer authorized to perform work for the permitted company. |
| 71 | 2 (Permit Issuance) | Diver specific permitting | At this time, it is proposed that Businesses and Independent Contractors will be required to possess valid permits. Any employee, agent, or representative of the company performing in-water hull cleaning on behalf of the permitted business will be required to possess valid Diver Identification Cards. |
| 72 | 3 (Tracking) | Boat owners should own tracking | The District finds that Individual Vessel Owners have a responsibility to adhere to the requirements and do their part in improving water quality. The draft Ordinance is proposing requirements for individual vessel owners relating to paint identification following the application of hull paint. Such tracking provisions include the receipt of a paint application certificate and sticker to be applied to the vessel that will clearly identify the paint type. |
| 73 | 3 (Tracking) | Boaters should be responsible for tracking. | The District finds that Individual Vessel Owners have a responsibility to adhere to the requirements and do their part in improving water quality. The draft Ordinance is proposing requirements for individual vessel owners relating to paint identification following the application of hull paint. Such tracking provisions include the receipt of a paint application certificate and sticker to be applied to the vessel that will clearly identify the paint type. |
| 74 | 3 (Tracking) | Boat yards already have paint records on boat owners and paints used and when hulls painted, utilize boatyards | Comment addressed. The draft Ordinance requires boatyard or boat maintenance and repair facilities to keep a log of annual hull paint use and affix a sticker to vessels identifying the hull paint and date of painting. |
| 75 | 3 (Tracking) | Can track through invoices | The draft Ordinance requires boatyard or boat maintenance and repair facilities to keep a log of annual hull paint use and affix a sticker to vessels identifying the hull paint and date of painting. |
| 76 | 3 (Tracking) | Can utilize stickers or tags to track non-compliant paints | Comment addressed. The draft Ordinance requires boatyard or boat maintenance and repair facilities to keep a log of annual hull paint use and affix a sticker to vessels identifying the hull paint and date of painting. |
| 77 | 3 (Tracking) | Cleaning 1x/month is critical for different paint types | Frequency requirements as proposed in the Draft Ordinance are specific to copper-based antifouling paints and coatings. Non-copper paints and coatings may be cleaned more frequently than once per month provided sufficient documentation is available to validate that the paint or coating is confirmed to be non-copper. |
| 78 | 3 (Tracking) | Concern with seasonal growth issues | The District has considered the concerns related to cleaning methods, frequencies and tools, and values the input of the hull cleaning community. At this time the District is proposing to align frequency requirements with the California Department of Pesticide Regulation for monthly cleaning. However, the District is also proposing the use of microfiber cloth and white pads as cleaning materials in addition to soft carpet. Additionally, plastic scrapers will be permitted in situations where growth warrants their use, as long as no plumes and paint removal occur. |

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| 79 | 3 (Tracking) | Utilize Marinas to track, they have all the required records and existing reports | Tracking is proposed to become a collective responsibility of marinas, hull cleaners, individual vessel owners and boatyards, each having their own responsibility in maintaining and overseeing hull paint and cleaning information. The draft Ordinance requires marina and yacht club facilities to keep and regularly update a monthly log of divers entering their facility, including slip numbers and vessel names being cleaned. In addition, Permittees are also required to keep a log of the vessels they clean each month including vessel name, marina, and slip number. |
| 80 | 3 (Tracking) | Couldn't marinas report and take divers out of it? Incorporate into the check-in process. | Tracking is proposed to become a collective responsibility of marinas, hull cleaners, individual vessel owners and boatyards, each having their own responsibility in maintaining and overseeing hull paint and cleaning information. The draft Ordinance requires marina and yacht club facilities to keep and regularly update a monthly log of divers entering their facility, including slip numbers and vessel names being cleaned. In addition, Permittees are also required to keep a log of the vessels they clean each month including vessel name, marina, and slip number. |
| 81 | 3 (Tracking) | When marinas turn in vessel tracking reporting, they can turn in cleaning frequency tracking of boats in their facility | Tracking is proposed to become a collective responsibility of marinas, hull cleaners, individual vessel owners and boatyards, each having their own responsibility in maintaining and overseeing hull paint and cleaning information. The draft Ordinance requires marina and yacht club facilities to keep and regularly update a monthly log of divers entering their facility, including slip numbers and vessel names being cleaned. In addition, Permittees are also required to keep a log of the vessels they clean each month including vessel name, marina, and slip number. |
| 82 | 3 (Tracking) | Reporting will have errors. Marinas have accountability. | Tracking is proposed to become a collective responsibility of marinas, hull cleaners, individual vessel owners and boatyards, each having their own responsibility in maintaining and overseeing hull paint and cleaning information. The draft Ordinance requires marina and yacht club facilities to keep and regularly update a monthly log of divers entering their facility, including slip numbers and vessel names being cleaned, thereby increasing accountability. In addition, Permittees are also required to keep a log of the vessels they clean each month including vessel name, marina, and slip number. |
| 83 | 3 (Tracking) | Marinas should track their boaters. | Tracking is proposed to become a collective responsibility of marinas, hull cleaners, individual vessel owners and boatyards, each having their own responsibility in maintaining and overseeing hull paint and cleaning information. The draft Ordinance requires marina and yacht club facilities to keep and regularly update a monthly log of divers entering their facility, including slip numbers and vessel names being cleaned. In addition, Permittees are also required to keep a log of the vessels they clean each month including vessel name, marina, and slip number. |
| 84 | 3 (Tracking) | What does monitoring and water/sediment data look like? Bay wide? | The Regional Harbor Monitoring Program collects sediment and water quality data bay-wide every 5 years. Reports are available on the Port of San Diego's website. In addition, on October 16, 2019 the District's Copper Reduction Page was updated with links to relevant studies, including the Regional Harbor Monitoring Report. |
| 85 | 3 (Tracking) | Key to research: Baseline, sediment data is both interesting and telling | On October 16, 2019 the District's Copper Reduction Page was updated with links to relevant studies. Information was also dispersed via email notifying interested parties of the website updates. |
| 86 | 3 (Tracking) | When was baseline of studies/data established? Provide reports to the public | On October 16, 2019 the District's Copper Reduction Page was updated with links to relevant studies. Information was also dispersed via email notifying interested parties of the website updates. |
| 87 | 3 (Tracking) | Chula Vista controls check in even if marina tracks- who is going to check it? | The District intends to conduct In-Water Hull Cleaning inspections at a greater frequency than was occurring during the previous permit. In addition, the District will be conducting record audits of Permittees, marinas and yacht clubs and boatyards to verify tracking records. The District reminds marinas and yacht clubs of their responsibility to check-in all divers prior to allowing entrance to facility and encourages any individual who observes in-water hull cleaning being performed by an unpermitted entity or not following BMPs to call the District immediately. The proposed draft Ordinance identifies enforcement provisions including, but not limited to, citations, fines, suspension or revocation of the Permit. |

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| 88 | 3 (Tracking) | Concern over level of paint quality | Paint products are regulated at the state level by the Department of Pesticide Regulation. |
| 89 | 3 (Tracking) | Condition assessments should be performed to determine if growth rate is higher | Comment noted. At this time the District is proposing to align the cleaning frequency requirements with the California Department of Pesticide Regulation. In addition, Stakeholders are encouraged to pursue additional research to answer data gaps or support alternative conclusions. |
| 90 | 3 (Tracking) | Database for improved tracking: Hull cleaners can use for tracking via CF numbers. | At this time, the District is not requiring the use of tracking technology in the proposed Ordinance. However, the District encourages hull cleaners, marinas or other stakeholders to consider developing, integrating, and/or sharing new concepts or technologies that can improve tracking as such efforts will improve current processes. |
| 91 | 3 (Tracking) | Blue Economy Incubator App- collecting data on Copper emissions- could be a mobile app. Use of tech is best to solve tracking issues. | At this time, the District is not requiring the use of tracking technology in the proposed Ordinance. However, the District encourages hull cleaners, marinas or other stakeholders to consider developing, integrating, and/or sharing new concepts or technologies that can improve tracking as such efforts will improve current processes. |
| 92 | 3 (Tracking) | Digital / Web based programs exist to track hull cleaning for Dive Companies | The District encourages hull cleaning Businesses to utilize advancements in digital and web based programs to assist in record keeping. However, the District is not requiring the use of tracking technology in the proposed Ordinance. |
| 93 | 3 (Tracking) | Mobile app for divers | The District encourages hull cleaning Businesses to utilize advancements in digital and web based programs to assist in record keeping. However, the District is not requiring the use of tracking technology in the proposed Ordinance. |
| 94 | 3 (Tracking) | Tracking cleaning already happens- all tracking should be a self-audit process | The proposed draft Ordinance includes requirements for tracking and record keeping for In-Water Hull Cleaning Activities. The District may audit records at any time during the permit term, as well as up to 90 days after the permit expires. |
| 95 | 3 (Tracking) | Look at the number on invoices for tracking. Metals would still need to be done more than 1x/month. Tracking would be hard to do in the field. | The proposed draft Ordinance identifies requirements for the cleaning of copper-based hull paints. Metals do not fall under these requirements. However, any cleaning of copper-based bottom paints must be tracked according to proposed requirements in the draft Ordinance and Permit. |
| 96 | 3 (Tracking) | Issue with surveillance, what will Port do with this new information and data. Tracking is big-brother like. | Tracking the use of paint provides better information about the products being used in San Diego Bay. In addition, record keeping holds parties accountable for adhering to the provisions in the draft Ordinance. The District reserves the right to audit records. |
| 97 | 3 (Tracking) | Is there Grant money available for tracking? | While the District is not requiring the use of technologies or databases for individual tracking responsibilities, the District encourages all stakeholders that have tracking requirements to apply for grants that may help in their records tracking. |
| 98 | 3 (Tracking) | More reporting increases amount of information that can get reported wrong | Comment noted. Per the proposed Ordinance language, all parties responsible for record keeping are required to do so completely and accurately. Failure to do so may result in penalties for violation of District Code Section 4.14. |
| 99 | 4 (Enforcement) | Advisory board of divers and Port staff | Comment noted. The District is not proposing to include the concept of an Advisory Board in the Ordinance/Permit amendment. However, the District encourages the hull cleaning industry to consider this and will attend or participate in meetings if such a process is established. |

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| 100 | 4 (Enforcement) | Other municipalities do not put burden of enforcement on divers. | Comment addressed. The District reached out to other jurisdictions that are experiencing similar copper impairments to further discuss how other regulated entities are addressing copper impairments. Adjustments in the draft Ordinance and Permit reflect those findings related to enforcement and training. |
| 101 | 4 (Enforcement) | Look at other jurisdictions- other areas are free for training | Comment addressed. The District reached out to other jurisdictions that are experiencing similar copper impairments to further discuss how other regulated entities are addressing copper impairments. Adjustments in the draft Ordinance and Permit reflect those findings related to enforcement and training. |
| 102 | 4 (Enforcement) | Educate boat owners | The District finds that Individual Vessel Owners have a responsibility to adhere to the requirements and do their part in improving water quality. The draft Ordinance is proposing requirements for individual vessel owners relating to paint identification following the application of hull paint. Such tracking provisions include the receipt of a paint application certificate and sticker to be applied to the vessel that will clearly identify the paint type. In this manner, it is anticipated that boater education will be improved. The District is also proposing to hold regular outreach events throughout the implementation of the Ordinance to educate boaters on the new rules and increase awareness of proper paint use and maintenance. |
| 103 | 4 (Enforcement) | Boatyards and paint manufacturers make money off paints. This is not a diver's problem. | Tracking is proposed to become a collective responsibility of marinas, hull cleaners, individual vessel owners and boatyards, each having their own responsibility in maintaining and overseeing hull paint and cleaning information. The draft Ordinance requires boatyard or boat maintenance and repair facilities to keep a log of annual hull paint use and affix a sticker to vessels identifying the hull paint and date of painting. The choice of when to repaint or the paint or coating product to use remains with the individual vessel owner at this time. |
| 104 | 4 (Enforcement) | Divers can call in when arriving by boat/at docks | The proposed draft Ordinance requires all divers, regardless of arrival vehicle (i.e. by car or boat), to check in at the marina or yacht club office prior to conducting work. |
| 105 | 4 (Enforcement) | For Divers arriving by boat, marinas can actually be a roadblock | Marinas are required to be involved in the check in process and follow the draft Ordinance requirements specific to facilities, including checking in all divers regardless of arrival vehicle (i.e. by car or boat), and ensuring valid permits and identification cards. Marinas and yacht clubs must address staffing issues to ensure compliance with the draft Ordinance and will need to determine their own means to facilitate this process at their individual facility and adhere to the Draft Ordinance for marina-related check in requirements. |
| 106 | 4 (Enforcement) | Dockmasters need to be more responsible- it is hard for divers to call in all the time | Marinas are required to be involved in the check in process and follow the draft Ordinance requirements specific to facilities, including checking in all divers regardless of arrival vehicle (i.e. by car or boat), and ensuring valid permits and identification cards. Marinas and yacht clubs must address staffing issues to ensure compliance with the draft Ordinance and will need to determine their own means to facilitate this process at their individual facility and adhere to the Draft Ordinance for marina-related check in requirements. |
| 107 | 4 (Enforcement) | Enforcement= marina has control of those going through gates | Marinas are required to be involved in the check in process and follow the draft Ordinance requirements specific to facilities, including checking in all divers regardless of arrival vehicle (i.e. by car or boat), and ensuring valid permits and identification cards. Marinas and yacht clubs must address staffing issues to ensure compliance with the draft Ordinance and will need to determine their own means to facilitate this process at their individual facility and adhere to the Draft Ordinance for marina-related check in requirements. |

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| 108 | 4 (Enforcement) | Not all marinas have full time staff at gates | Marinas are required to be involved in the check in process and follow the draft Ordinance requirements specific to facilities, including checking in all divers regardless of arrival vehicle (i.e. by car or boat), and ensuring valid permits and identification cards. Marinas and yacht clubs must address staffing issues to ensure compliance with the draft Ordinance and will need to determine their own means to facilitate this process at their individual facility and adhere to the Draft Ordinance for marina-related check in requirements. |
| 109 | 4 (Enforcement) | Divers should be fined if they don't sign in. | The proposed draft Ordinance requires all divers, regardless of arrival vehicle (i.e. by car or boat), to check in at the marina or yacht club office prior to conducting work. The District reminds all hull cleaners of their responsibility to check-in all prior to conducting hull cleaning in a facility and encourages any individual who observes in-water hull cleaning being performed by an unpermitted entity or not following BMPs to call the District immediately. The proposed draft Ordinance identifies enforcement provisions including, but not limited to, citations, fines, suspension or revocation of the Permit. |
| 110 | 4 (Enforcement) | Better staffing of Marinas to enforce (Hours/Time restrictions when divers can enter) | Marinas are required to be involved in the check in process and follow the draft Ordinance requirements specific to facilities, including checking in all divers regardless of arrival vehicle (i.e. by car or boat), and ensuring valid permits and identification cards. Marinas and yacht clubs must address staffing issues to ensure compliance with the draft Ordinance and will need to determine their own means to facilitate this process at their individual facility and adhere to the Draft Ordinance for marina-related check in requirements. In addition, while the District does not regulate an individual business's hours, marinas are encouraged to consider limiting hours of hull cleaning activity to standard business hours, unless they intend to follow the check-in process outside of their standard business hours. |
| 111 | 4 (Enforcement) | Limit diver working hours to M-F 9-5 | The District does not regulate an individual business's hours, however marinas are encouraged to consider limiting hours of hull cleaning activity to standard business hours. |
| 112 | 4 (Enforcement) | Issue of tailgating/piggybacking- divers not checking in or being granted access to docks but just following someone in to Marina | The proposed draft Ordinance requires all divers, regardless of arrival vehicle (i.e. by car or boat), to check in at the marina or yacht club office prior to conducting work. Marinas are required to be involved in the check in process and follow the draft Ordinance requirements specific to facilities, including checking in all divers and ensuring valid permits and identification cards. Marinas and yacht clubs must address staffing issues to ensure compliance with the draft Ordinance and will need to determine their own means to facilitate this process at their individual facility and adhere to the Draft Ordinance for marina-related check in requirements. The District encourages any individual who observes violations of in-water hull cleaning or check in practices to call the District immediately, as Ordinance provisions are enforceable upon marinas as well as divers. |
| 113 | 4 (Enforcement) | Marinas themselves/dockmasters letting divers in that are not permitted, giving keys to divers just to let them in. | The proposed draft Ordinance requires all divers, regardless of arrival vehicle (i.e. by car or boat), to check in at the marina or yacht club office prior to conducting work. Marinas are required to be involved in the check in process and follow the draft Ordinance requirements specific to facilities, including checking in all divers and ensuring valid permits and identification cards. Marinas and yacht clubs must address staffing issues to ensure compliance with the draft Ordinance and will need to determine their own means to facilitate this process at their individual facility and adhere to the Draft Ordinance for marina-related check-in requirements. The District encourages any individual who observes violations of in-water hull cleaning or check in practices to call the District immediately, as Ordinance provisions are enforceable upon marinas as well as divers. |
| 114 | 4 (Enforcement) | How much does Port take in, in citation fines? | The District issues fines related to in-water hull cleaning when applicable but also uses other means of enforcement such as citations and permit suspension. |

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| 115 | 4 (Enforcement) | Current enforcement processes work | Comment noted. Many of the current enforcement processes were retained in the revised Ordinance and Permit. |
| 116 | 4 (Enforcement) | Enforcement works best when company has control | Many of the current enforcement processes were retained in the revised Ordinance and Permit. It is further proposed that Permitted Businesses and Independent Contractors are required to ensure all employees, agents and representatives are in compliance with all applicable requirements in both the draft Ordinance and Permit. |
| 117 | 4 (Enforcement) | Need more enforcement | The District intends to conduct In-Water Hull Cleaning inspections at a greater frequency than was occurring during the previous permit. In addition, the District will be conducting record audits of Permittees, marinas and yacht clubs and boatyards to verify tracking records. The District reminds marinas and yacht clubs of their responsibility to check-in all divers prior to allowing entrance to facility and encourages any individual who observes in-water hull cleaning being performed by an unpermitted entity or not following BMPs to call the District immediately. The proposed draft Ordinance identifies enforcement provisions including, but not limited to, citations, fines, suspension or revocation of the Permit. |
| 118 | 4 (Enforcement) | More enforcement will "weed out" the rule breakers. There are currently no barriers to entry. | The District intends to conduct In-Water Hull Cleaning inspections at a greater frequency than was occurring during the previous permit. In addition, the District will be conducting record audits of Permittees, marinas and yacht clubs and boatyards to verify tracking records. The District reminds marinas and yacht clubs of their responsibility to check-in all divers prior to allowing entrance to facility and encourages any individual who observes in-water hull cleaning being performed by an unpermitted entity or not following BMPs to call the District immediately. The proposed draft Ordinance identifies enforcement provisions including, but not limited to, citations, fines, suspension or revocation of the Permit. |
| 119 | 4 (Enforcement) | Enforcement is not effective, frequency is poor. Many divers have voiced only being checked while cleaning once or not at all in past 8 yrs | The District intends to conduct In-Water Hull Cleaning inspections at a greater frequency than was occurring during the previous permit. In addition, the District will be conducting record audits of Permittees, marinas and yacht clubs and boatyards to verify tracking records. The District reminds marinas and yacht clubs of their responsibility to check-in all divers prior to allowing entrance to facility and encourages any individual who observes in-water hull cleaning being performed by an unpermitted entity or not following BMPs to call the District immediately. The proposed draft Ordinance identifies enforcement provisions including, but not limited to, citations, fines, suspension or revocation of the Permit. |
| 120 | 4 (Enforcement) | Enforcement not a hindrance to people going out without a permit. | The District intends to conduct In-Water Hull Cleaning inspections at a greater frequency than was occurring during the previous permit. In addition, the District will be conducting record audits of Permittees, marinas and yacht clubs and boatyards to verify tracking records. The District reminds marinas and yacht clubs of their responsibility to check-in all divers prior to allowing entrance to facility and encourages any individual who observes in-water hull cleaning being performed by an unpermitted entity or not following BMPs to call the District immediately. The proposed draft Ordinance identifies enforcement provisions including, but not limited to, citations, fines, suspension or revocation of the Permit. |
| 121 | 4 (Enforcement) | How much money is needed to do effective enforcement | Fees collected are used for the administrative process that goes into obtaining a permit. Staffing for enforcement is incurred through Port general operations budgets. |
| 122 | 4 (Enforcement) | Increase Fees, which could in turn help support increase in staff and enforcement. | At this time, it is proposed that Permit fees will remain at \$250. |

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| 123 | 4 (Enforcement) | Inspectors need to be material experts | District Inspectors are trained to check Permits, Diver Identification Cards, and identify visible paint plumes. It is anticipated that District Inspectors will attend the standardized training that will be implemented as part of the new training requirements. |
| 124 | 4 (Enforcement) | Industry inspector are experts. Standardize training for inspectors | District Inspectors are trained to check Permits, Diver Identification Cards, and identify visible paint plumes. It is anticipated that District Inspectors will attend the standardized training that will be implemented as part of the new training requirements. |
| 125 | 4 (Enforcement) | One particular marina would like to get feedback on how they are doing regarding diver check ins. Do inspectors find many issues while performing inspections at their facility? | The District encourages this marina (and any others), to reach out to District Inspectors with any questions regarding their facility inspections. |
| 126 | 4 (Enforcement) | Master BMP or Unified Course 100% run by Port that is tied into science | At this time, the District proposes to provide training conducted by a Port-contracted service provider with knowledge and specialization in cleaning the various types of paint used locally in the San Diego region. The selection process will be open for bid; anyone can apply to become the contracted service provider provided they train on the BMPs contained in the Ordinance, when adopted. |
| 127 | 4 (Enforcement) | Better enforcement technology | At this time, the District is not requiring the use of tracking technology in the proposed Ordinance. However, the District encourages hull cleaners, marinas or other stakeholders to consider developing, integrating, and/or sharing new concepts or technologies that can improve tracking as such efforts will improve current processes. |
| 128 | 4 (Enforcement) | Use technology to improve enforcement | At this time, the District is not requiring the use of tracking technology in the proposed Ordinance. However, the District encourages hull cleaners, marinas or other stakeholders to consider developing, integrating, and/or sharing new concepts or technologies that can improve tracking as such efforts will improve current processes. |
| 129 | 4 (Enforcement) | Port cannot endorse a "for profit" app | At this time, the creation of a mobile app is not part of the revised Ordinance. |
| 130 | 4 (Enforcement) | Not all in audience agree with tech app | At this time, the District is not requiring the use of tracking technology in the proposed Ordinance. However, the District encourages hull cleaners, marinas or other stakeholders to consider developing, integrating, and/or sharing new concepts or technologies that can improve tracking as such efforts will improve current processes. |
| 131 | 4 (Enforcement) | County of LA conducted free training. Divers there are educated and compliant. | At this time, it is proposed the District will provide training conducted by a Port-contracted service provider with knowledge and specialization in cleaning the various types of paint used locally in the San Diego region. The District will cover the cost of the training for the divers. |

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| 132 | 4 (Enforcement) | Provide a training permit to allow for proper training of divers | The draft Permit proposes language addressing a "Trainer-of-Record". That is, a permittee may identify one employee as the Trainer-of-Record who must accompany trainee at all times underwater and will be responsible for adherence to all Permit-related activities of the trainee. Only a single trainee is permitted to be conducted in-water hull cleaning with the "Trainer-of-Record" at a time. Additionally, at this time, the District proposes to provide training conducted by a Port-contracted service provider with knowledge and specialization in cleaning the various types of paint used locally in the San Diego region. All trainees will be required to have completed the training prior to being issued a Diver Identification Card. |
| 133 | Parking Lot | What brush is being used on Transient Dock Boat Wash? | The boatwash brushes are a proprietary product owned by Rentunder, the boatwash owner. |
| 134 | Parking Lot | We all want a cleaner bay. Concern with the Navy and their practices. How does Navy factor in to WQ discussion. Seaward Marine services their vessels. | The U.S. Navy is not within the Port District jurisdiction, nor does the Port District have any authority or control on or related to military bases or facilities. |
| 135 | Parking Lot | Is the Navy factored in to the levels of copper in the Bay? Feels like the little guy is being singled out, IWHC are not the problem, the Navy is. | The U.S. Navy is not within the Port District jurisdiction, nor does the Port District have any authority or control on or related to military bases or facilities. The U.S. Navy conducts their own water quality monitoring programs and assesses pollution from their operations. |
| 136 | Parking Lot | Take leach rate into account (DPR Study) | The California Department of Pesticide Regulation study is regarded as the best available science regarding leach rates. |
| 137 | Parking Lot | How many times a year does SIYB survey for vessel tracking? | Per SIYB TMDL and Investigative Order requirements, all marinas and yacht clubs in SIYB must submit vessel tracking data to the District by January 15th, annually. |
| 138 | Parking Lot | Is the state looking to ban copper? | At this time, the District is unaware of any existing plans to ban copper paints at the state level. The California Department of Pesticide Regulation is the agency tasked with regulating copper paints. |
| 139 | Parking Lot | Not a fair playing field- copper paints still legal and paint formulation is critical | The California Department of Pesticide Regulation is the agency tasked with regulating copper paints. The District reminds boaters and hull cleaners that non-copper alternatives are available and consumers have a choice as to which paint is selected to go on their boats. |
| 140 | Parking Lot | New paint regulation can't achieve a 76% reduction, paints are putting copper in the water, state can't meet the reduction and we as divers can't compensate for paint regulation itself. | The California Department of Pesticide Regulation recognized that not all impaired basins would be fixed by the 2018 Maximum Leach Rate Regulation. In addition to the 2018 DPR Regulation, a series of suggested Best Management Practices (BMPs) were published by the DPR, including reducing cleaning frequencies to no more than one time a month. |

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| 141 | Parking Lot | New paint formulations are not reaching goal | <p>The California Department of Pesticide Regulation recognized that not all impaired basins would be fixed by the 2018 Maximum Leach Rate Regulation. In addition to the 2018 DPR Regulation, a series of suggested Best Management Practices (BMPs) were published by the DPR, including reducing cleaning frequencies to no more than one time a month. The District is aligning with the DPR cleaning frequency. In addition, the Ordinance amendment that is being undertaken by the District is intended to be an iterative process and will be re-evaluated in the coming year to determine if these actions are adequate to improve water quality. Regular water quality monitoring will be conducted throughout the year to evaluate the effectiveness of Ordinance amendments in reaching water quality requirements. Should proposed measures not achieve water quality requirements, additional changes may be proposed to the Board of Port Commissioners.</p> |