



MARINA DEL REY  
CONVENTION AND VISITORS BUREAU



May 13, 2014

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100, Sacramento, CA 95812-2000 (mail)  
1001 I Street, 24th Floor, Sacramento, CA 95814 (hand delivery)  
Email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

RE: Opposition To Proposed Amendment to the Los Angeles Regional Basin Plan To Revise the Total Maximum Daily Loads for Marina del Rey Toxic Pollutants

The Marina del Rey Convention and Visitors Bureau has a direct interest in the economic health of the boating community and anchorages. The Marina brings many visitors to our community which help to stimulate our local, regional and state economy. These visitors support local businesses such as restaurants, retail shops, charter yachts and recreational water activities. These attractions are what make Marina del Rey a premier tourism destination for both leisure visitors and business travelers. One of Marina del Rey's strongest draws for visitors is the fantastic view of the water and the many boats, yachts and water activities that can be seen from just about every location. These views are what set the Marina's hotels and restaurants apart from our neighboring destinations.

The Marina del Rey Convention & Visitors Bureau is firmly opposed to the LA RWQCB proposed TMDL Amendment and ask the State Water Control Board to reject the Amendment for the reasons stated in this letter, and by other commentators.

By making boaters and anchorages liable for the copper in the water, and forcing boaters to spend many thousands of dollars to strip and replace their hull paint at a major cost, the Board is going to drive many boaters out of the marina and create economic uncertainty for businesses and the community at large, just as we are starting to recover from the harmful effects of the Great Recession.

The Board's Economic Analysis is obviously incomplete and doesn't even address the impact on surrounding businesses. The Board states that there will be no loss of business in the Marina. This is simply not a credible claim, as you would be hard-pressed to find anyone in the business community who finds this economic analysis to be convincing. A significant number of boaters will, in fact, leave; while others may choose to sell their boats. As a result, boat values will be depressed. Slip vacancies will increase dramatically. The boaters who stay will have less money to spend. There will be a downturn for local businesses. The end result is that recreational boating, which is promoted by the California Coastal Act under the jurisdiction of the California Coastal Commission, will be discouraged and seriously endangered in Marina del Rey.

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Unlike governments and regulatory bodies that are publicly financed, the anchorages, boaters and businesses have to earn the money to stay in the Marina and pay their bills. What the Los Angeles Board failed to realize is that even a small 5 to 10% loss of income to anchorages and to the surrounding community can mean the difference between running a successful business or one that is doomed to failure.

This Amendment is a potential negative tipping point that the Board ignores in its "Economic Analysis."

In San Diego, that Regional Board adopted a phased program to give the boating community and businesses an opportunity to deal with the potential impact before incurring serious economic and legal risks and they provided for a 17 year compliance period. The Los Angeles Board chose to ignore testimony that noted that its proposed 10-year compliance period with more stringent requirements is simply unachievable and unrealistic. Additionally, the Los Angeles Board appeared indifferent and unwilling to entertain a more pragmatic approach to achieving water quality that is desired by boaters, anchorages and the business community.

We formally request that the State Board reject the TMDL Amendment as currently drafted.

Sincerely,

A handwritten signature in black ink, appearing to read 'Janet Zaldua', with a long horizontal line extending to the right.

Janet Zaldua  
Executive Director  
Marina del Rey Convention & Visitors Bureau

Copy to:  
Concerned Citizens of Marina del Rey  
Cmichaels90292@gmail.com