



PROPOSED APPROVAL OF AN AMENDMENT TO THE WATER QUALITY CONTROL PLAN FOR THE LOS ANGELES REGION (BASIN PLAN) TO REVISE THE MARINA DEL REY HARBOR TOXIC POLLUTANTS TOTAL MAXIMUM DAILY LOAD (TMDL)

The economic analysis has no basis in fact. I have had my 30 foot sail boat for 14 years. I have had the bottom painted 4 times and there has never been a need to strip the bottom as the analysis claims. I would not strip the bottom at the next required painting in two years. I have never had any of the three boat yards I have done business with recommend stripping the bottom. This is obviously something that is quite erroneous in the economic analysis. It is a high cost for older boat owners who maintain their boats well but in today's market have a very low resale value. It would be a major factor for the resale of the boat. Obviously, it would benefit moving the boat elsewhere. It is so expensive that it would make the continuing ownership questionable in Marina Del Rey.

This cost is well out of economic reach for me, and it is softened by a promise that maybe some grant money could help. That is a big maybe. I can afford bottom painting every 4 years, but add the stripping costs and the new paint requirement, it will quadruple the cost of the next bottom painting. That incredible cost would be half the market value of my boat in today's economy.

In the 14 years I have owned the boat newer paints were required to address for the copper levels in the marina. Is it fair for the State to make current boat owners liable for levels of copper in the marina that accumulated over many years? This comes as a shock to responsible boaters who have maintained their boats and used perfectly legal hull paints.

Why are other boaters or anchorages in the state not being held responsible for hull paint copper leaching into the sea? Or previous boaters?

Why is Marina del Rey being treated more heavy handedly than every other marina in the state? Why is the Shelter Island program in San Diego voluntary, with a longer time period to comply? Why not phase it in as a requirement for all new boats?

Also a marina is a marina not a wetland. It is even more unrealistic to assume the copper levels are just boaters bottom paint, considering the toxic mess that comes from Balona creek at the entrance of the Marina after every rain storm. Not addressing that huge pollution source, a major source that really pollutes the Marina, makes it seem that there is no real water quality control plan. Engine exhaust waste goes into the water as well – that could be a Jet boat up to a mega yacht. Can it be proven that by implementing this plan it will alleviate the problem? I doubt it.

This proposal has been approved with virtually no thought process or a study of all factors impacting the copper levels in the Marina. And the economic analysis is so flawed and ignorant that this proposal cannot go forward.

Bruce Warner