



PO Box 1028  
Ventura, CA 93002

August 9, 2018

Los Angeles Regional Water Quality Control Board  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Attn: Rosario Aston  
Via Email: [Rosario.Aston@waterboards.ca.gov](mailto:Rosario.Aston@waterboards.ca.gov)

**RE: Mandalay Generating Station; NPDES CA0001180; CI 2093**

We are writing on behalf of the Ventura County Chapter of the Surfrider Foundation. Since 1991, our local volunteer network has worked diligently to improve water quality on our county's beaches. We have engaged in numerous stakeholder processes and commented on many local water quality issues over the years.

The decommissioning of the Mandalay power plant offers perhaps the most significant improvement to our coastline in decades. The removal of this industrial facility and associated NPDES permit will end the persistent harmful discharge into our coastal waters.

It is unfortunate that the reduction in circulation may be exacerbating a water quality problem in Channel Islands Harbor. The existing NPDES permit is outdated under current regulations, and should not be reinstated in order to transfer polluted water from one water body to another.

Surfrider believes that source control and better harbor management will offer great improvements to resolve an existing problem within the harbor. We have been in communication with the Channel Islands Neighborhood Council, and our correspondence is attached for your information.

Sincerely,

*Laura Oergel*

Laura Oergal  
Chair, Ventura County Chapter  
Surfrider Foundation



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Ventura, CA 93002

August 9, 2018

CHANNEL ISLANDS NEIGHBORHOOD COUNCIL  
1237 South Victoria Avenue, Box 504  
Oxnard, CA 93035  
Email: Info@CINeighbors.com

**RE: Water Quality in Channel Islands Harbor**

**TO: Channel Islands Neighborhood Council**

The Surfrider Foundation is aware of the situation at Channel Islands Harbor. We reviewed the Channel Islands Neighborhood Council letter of July 20, 2018, and understand the concerns of neighborhood. The outpouring of concern and call to action within the community is admirable. If only the beach residents had shared the same concern...

As stated in the letter;

*It is our understanding that it was not clearly disclosed or explained to you in the NRG closure applications that the pumps captured and used the waters from what is, for all intents and purposes, **the end loop of the entire Harbor's flushing system** and that shutting down the pumps used by Mandalay would totally impeded the tidal outflow of the waters.*

*Further, the picture becomes more complex when you are made aware that this same **canal appears to serve as the irrigation run-off for miles of farm fields, thus infusing chemicals and fertilizers into the water which as of now - and as a result of the canal blockade, are flowing directly back into the Harbor itself with no filtration of any kind.***

These concerns, and more, have led the Surfrider Foundation over the past decades to support the decommissioning of the Mandalay Powerplant. This was one of the few remaining OTC (Once-Through-Cooling) power plants on the California Coast. This facility effectively collected urban runoff, harbor pollution (oil, fuel, bottom paint, soap, bilge water, sewage, etc), and agricultural runoff, heated this mixture up, then pumped it onto the beach.

**Our ocean waters have suffered ever since this industrial facility began operations in 1957.**

## **Beach Water Quality**

For decades beachgoers have endured impaired water quality at Oxnard's beaches. Although "the solution to pollution is dilution" may sound valid, the reality is that longshore currents have kept the power plant effluent close to the beach, with waves moving it along the shoreline but not out to sea. There has been a noticeable visual and often odorous impact to the beach water, with unknown concentrations of toxic chemicals and nutrients persisting in the surf zone. The specific impacts of this discharge are hard to quantify, but it should be noted that in 2009 the State of California issued an advisory against eating fish caught on these beaches.

## **Harbor Water Quality**

The problems recently noticed by harbor residents existed long before the power plant shutdown, although reduced circulation and recent heat wave likely exacerbated the situation.

Water quality has been a problem in Channel Islands Harbor for decades. For example, in the 1990s the Surfrider Foundation worked with The Beacon Foundation, an organization formed by local residents, and later Ventura CoastKeeper, who fought for over a decade to improve water quality at Kiddie Beach. Kiddie Beach remains impaired, and studies concluded that lack of circulation in the Harbor, Harbor boating practices, and sewage contamination contribute to unhealthy bacteria levels near the mouth of the harbor.

Poor circulation exacerbates this problem in the back channels of the harbor. It is not surprising that recent testing identified problems in the Westport, Harbor Island, and SeaBridge areas. In fact, Surfrider filed comments on the the SeaBridge development project when the City of Oxnard circulated an environmental document on harbor expansion. At the time it was clear that this would create the backwater condition that has finally come to light.

It should be noted that this is not a unique problem, and harbors throughout California frequently experience fish kills due to lowered dissolved oxygen levels. This is usually the result of algae blooms fueled by high nutrient input combined with warm water and poor circulation. Recent examples include Marina Del Rey (2014) and Ventura Harbor (2011). "Hobie Beach" at Ventura Harbor along with "Kiddie Beach" in CI Harbor are both listed for bacterial contamination.

## **NPDES Discharge permit**

The NRG power plant possessed a permit to discharge its cooling waters onto the beach. Because of impacts to marine life, the State of California has sought to eliminate such "once through cooling" discharges. If NRG were to have upgraded the plant, it would have been a

modernized facility which did not discharge waste water. The existing permit was specifically for the power plant discharge, and was due to expire with plant modifications.

### **Solutions to improve Harbor Water Quality**

It has been suggested that the power plant pumps should be maintained in order to enhance harbor circulation. The neighborhood Council has filed an appeal with the RWQCB to deny ceasing the NPDES permit. This appeal does not fully appreciate that the permit is not transferrable to other uses, and that any future discharge would require new permits. This was communicated in the RWQB letter of July 19, 2018.

It has also been suggested that the power plant canal could somehow be breached across the beach in order to maintain an outlet for the harbor. Because of the dynamic nature of the beach, it is not a simple task to maintain such an outfall. One only has to visit Oxnard beaches during the rainy season to understand the challenge the city faces in draining stormwater across the beach. Just as harbor entrances need to be dredged, so do other inlets or outlets.

Because neither of these proposals are feasible, the most effective approach to the problem is controlling the source of pollution entering the harbor, and monitoring the problem to assess improvements and mitigate before a fish kill occurs.

Surfrider has actively worked with government agencies to try to encourage reduced stormwater into our waterways, many of which discharge into the harbors. Our Ocean Friendly Gardens program is one example of possible actions. Meanwhile, it has been discouraging to witness recent construction projects within the harbor itself that fail to mitigate runoff in accordance with “Low Impact Development” guidelines. Similarly, Surfrider has advocated for “Best Management Practices” on agricultural lands to prevent pollution from entering our waterways. This industry is characteristically slow to adopt changes to their standard operations, even though relatively simple measures can make a big difference.

### **Recommendations**

Surfrider commends the Channel Islands Community for uniting on this issue. For years the poor water quality associated with the harbor has gone largely unnoticed. The cessation of the power plant pumps may have temporarily exacerbated the problem, but the situation is not new.

We encourage the harbor residents to direct their efforts toward source control and mitigation.

**Sources of pollutants entering the harbor should be monitored and solutions developed to curtail or eliminate them.** Current water quality rules encourage improved water management

practices, but until a community demands it, enforcement alone cannot force the necessary changes.

In the meantime, the **aeration systems installed by the City of Oxnard have demonstrated viability** as a means to mitigate for lowered dissolved oxygen levels. Similar to the sand-moving efforts at Oxnard Shores, this will not solve the root cause of the problem but merely help reduce the impacts of water pollution.

Surfrider is happy to assist with developing programs to improve the water quality in the harbor. Residents and boat owners can and should play a role in this process; indeed, success depends on it.

We hope these comments are helpful and look forward to working with you on this important issue.

Sincerely,

*Laura Oergel*

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Chair, Ventura County Chapter  
Surfrider Foundation

