

August 1st, 2018

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CA-RWQCB

Cassandra D. Owens/Aston Rosario,
Chief Industrial Permitting Unit,
Regional Water Quality Control Board
320 W. 4th St., suite 200
Los Angeles, CA 90013

RE: PERMIT TERMINATION MANDALAY GENERATING STATION (NPDES NO. CA0001180, CI No. 2093)

Dear Water Quality Control Board Members,

While you have, by now, almost certainly been made aware of the never before seen ecologic crisis that has unfolded in the Channel Islands Harbor, I am writing to you as an eye witness to this tragedy, one that you have a significant influence in aborting.

One of the main reasons that my family decided to relocate to the Channel Island Harbor was the vibrant and varied ecosystem that flourished here, one that no doubt was spurned to life by the harbor's clean water. Much to everyone's dismay, however, this ecosystem is quickly coming to a grinding halt. While there had been some speculation that there would be adverse effects to the health of the ecosystem upon closure of the NRG Mandalay Peaker plant on March 31, 2018, none of us really imagined they would be to a scale that we have seen, with a near complete eutrophication of parts of the harbor that are no longer circulating water. While we fully understand and support the State Water Resources Board's mandate to minimize the disruption to aquatic life that can result from large volume/velocity use of ocean water for cooling, it does not appear that the unique nature of this particular harbor was factored in – specifically the beneficial and vital role of water circulation via the Mandalay Generating Station pumps through this enormous harbor marina in promoting and maintaining the health of the ecosystem and quality of water. But, there's hope that this can be remedied, but only if we all do our part and act to stop this crisis immediately. This is where we need your assistance in reconsidering the termination of water flow through the MGS (generating station) - either by an extension /repurposing of this permit or the allowance of an application for a new permit that would enable some type of circulation, be it passive or active. I am by no means an expert in this branch of engineering but we desperately need your authoritative assistance and engineering guidance.


The most immediate actions might be to first stop any further closure of the inlet and outlet ports at the plant and next begin low flow intermittent circulation to an extent that permits some circulation without the harmful effects of high velocity and heat/pressure on marine life. The Edison Canal has for half a century served as the umbilical cord to the harbor, and now that this cord has been cut, the ecosystem is literally suffocating a slow death that we cannot just stand by and watch occur. Please, sea life is dying and the threat of massive sea life loss in future months and years is looming especially as the algae bloom that occurred returns next summer in full force once the winter storms fill up the harbor with nutrients from the surrounding agricultural runoff. The recent presentation by marine biologist Dr Caron of USC to the city of Oxnard during the July 11th harbor task force

meeting provided clear and convincing evidence that the harbor suffered an unprecedented algae bloom and they gave us clear recommendations to begin continuous oxygen and chlorophyll monitoring. Never before in 50 years has this been necessary but basically the message was "watch out, it's going to happen again, best prepare." The marine life that is suffering is unable to speak for itself but thankfully, there has been a public outcry to reverse and retrace our steps to undo this mess. Please, we implore you to use any and all of your broad influence in these matters to implement restoration of water circulation in the harbor without delay.

Oxnard and its harbor residents need your help in facilitating a reopening of the flow in the Edison Canal to help correct this current problem before it gets much worse.

Thank you for your assistance. We are here to partner with you toward a prompt and permanent solution. There are hundreds of us at the ready to pitch in our talent and resources to this cause.

Respectfully,

A handwritten signature in dark ink, appearing to read 'Akshay J. Manek', with a long, sweeping horizontal line extending to the right.

Akshay J. Manek,