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Mandalay Generating Station; NPDES No. CA0001180 / CI No. 2093

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August 8, 2018

Los Angeles Regional Water Board Commissioners  
C/O Rosario Aston, LARWQB Staff Representative  
Los Angeles Regional Water Quality Control Board  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Attention: Madelyn Glickfeld, Chair  
Lawrence Yee, Vice- Chair  
Irma Munoz, Member  
Charles Stringer, Member  
Cynthia Guzman, Member

and: Cassandra D. Owens, LARWQB Chief, Industrial Permitting Unit

Regarding: Notice to Thomas DiCiulli, Plant Manager Dated June 28, 2018  
Mandalay Generating Station Tentative Termination of WDRs etc., Oxnard CA  
California South LP Mandalay  
NPDES No. CA00001180 / CI No. 2093

Dear Honorable Commissioners:

We have lived in Mandalay Bay at Channel Islands Harbor for seven years and we are very concerned about the degraded water quality in our harbor. We have never seen so much unusual algae and murky water. We cannot see more the 3 feet deep in our channel now. We are accustomed to seeing the bottom of our channel at over 10 feet deep.

The NRG Mandalay Generating Station used cooling pumps that circulated 50 million gallons of seawater per day from the Channel Islands Harbor through the Edison Canal and out to the Pacific Ocean. Those pumps were shut down in March 2018 and the blockage of the outflow has contributed to the degraded water quality in the Channel Islands Harbor.

The Algae Bloom that we experienced starting in mid-June was the result of low dissolved oxygen, higher water temperatures, increased nutrients and reduced water circulation, according to a study conducted by Aquatic Eco Technologies and Aquatic Bioassay Consulting. They compared our situation with the massive Algae Blooms that killed over 175 tons of fish in King Harbor Redondo Beach in 2005 and 2011. We do not want that to happen in the Channel Islands Harbor.

Aquatic Bioassay tested the water quality at 5 locations in the Channel Islands Harbor on June 19<sup>th</sup>, 21<sup>st</sup> and 22<sup>nd</sup> 2018 and reported that Total Nitrogen (TKN) and Ortho Phosphates exceed levels "Of Concern". These contaminants come from irrigation and storm water run-off.

The Oxnard Public Works Department started testing water quality at 25 sites in the Channel Islands Harbor on June 23<sup>rd</sup>. They reported that several of the sites showed dissolved oxygen (DO) below 5.0 through early July. DO levels below 5.0 ppm are considered hazardous to aquatic species. Oxnard Public Works also tested 5 sites on June 28<sup>th</sup> for bacteriological contaminants and found that the results were within acceptable levels on that date.

The **Ventura County Resource Management Agency** (VCRMA.org) conducts weekly tests at 2 locations near the entrance of the Channel Islands Harbor (Hobie Beach and Kiddie Beach) and those areas have **exceeded California State safety standards for 20 days since the NRG pumps have been shut down**. The beaches were posted with signs warning people to avoid body contact due to health concerns.

Oxnard Public Works needs to increase our water quality testing for “Indicator Bacteria” (total coliform, fecal coliform and enterococcus) at other locations in the Channel Islands Harbor that are farther from the harbor entrance. **Seabridge East, Westport and Seabridge North are more than 2 miles from the harbor entrance and consequentially have less circulation to flush the contaminants out of the harbor.**

A 2001 **Water Quality Study Report** by Moffatt and Nicolls Engineering predicted that water quality in the Channel Islands Harbor would deteriorate when the NRG pumps were scheduled to be shut down in 2020, in compliance with the Once-Through-Cooling requirements. They estimated the “residence time” would increase from 6 days to 17 days at Seabridge. We need another hydrological study to confirm that shutting down the NRG pumps and blocking the outflow channel has contributed to the decreased circulation and increased contaminants in the Channel Islands Harbor.

The Regional Water Board’s Order No R4-2018-xxxx that required or **allowed NRG to block the only compliant discharge for agricultural and storm water run-off is inappropriate and possibly illegal**. Without any discharge point, the agricultural and storm waters that flow into the 2.3 mile long Edison Canal have nowhere to go, except back into the Channel Islands Harbor at low tide.

The California Water Board’s **Storm Water Fact Sheet** states that “Water runoff can carry pollutants that degrade water quality and impact the beneficial use of our waters – beneficial use that belongs to all Californians and **entrusted to the California Water Board to protect**...California State Water Board, Regional Water Quality Control Boards and the US EPA have regulated the runoff and treatment of storm water” to protect our waters.

We respectfully request that the Water Board reconsiders this order and requires NRG to research and recommend a solution to re-establish the flow of water through the Edison Canal that will provide circulation that restores the water quality in Channel Islands Harbor to the levels prior to the shutdown.

Thank you for your consideration and your positive action to save Channel Islands Harbor water quality.  
Sincerely,

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cc: Info@cineighbors.com