

July 24, 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 DiCiolli, 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 along with the greater community here in Ventura County, have recently experienced an extremely serious condition affecting the waters of the Channel Islands Harbor. We have gathered with community stakeholders, boaters, kayakers, swimmers, visitors, both within and without the boundaries of our neighborhood council in a mighty effort to bring to your attention a matter of grave concern.

One does not have to live on the water or be a “water person” to appreciate and value the beautiful clear and clean Channel Islands Harbor. This Harbor, which is the fifth largest recreational harbor in the State of California, has often been cited as the cleanest in the State. Sadly, the Harbor has recently suffered a devastating blow to its pristine condition. We regret to tell you that in your effort to accommodate the NRG Mandalay Generating Station early shut-down in accordance with the NPDES mandate for closure of water-cooled generating stations, this significant decision has had a dramatic negative effect on the Channel Islands Harbor waters and its aquaculture. We have substantive evidence that because of this shut-down, the circulation system that has existed in this Harbor from its construction completion in 1965,

has been completely physically impeded causing significant quantitative negative results to both the water and the marine life.

*With due respect for your authority in this matter, we are, nonetheless, requesting with the strongest urgency that the Board immediately reverse its decision to allow suspension of the NRG NPDES permit and the acceptance of the shutdown of its circulation pumps prior to the legally-mandated shutdown date. We urge that the Board, concurrently, require NRG to reinstate the pumps operations or otherwise facilitate the outflow of the Edison Channel waters until such time that an alternate method of water circulation and flushing for the Channel Islands Harbor can be determined and implemented.*

We believe that when you responded positively to NRG's request for approval of the early shutdown of its operation which, in simple terms, resulted in the cessation of the pumps that used the waters from the Channel Islands Harbor via the Edison Canal (aka Mandalay Canal), the Board was not fully informed of the ecological impact that this decision would have on the vibrant and healthy Channel Islands Harbor. 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.

Frankly, we believe NRG could easily have predicted the disastrous effects this shutdown would have on the entire Harbor and, consequently, had an obligation to disclose this situation in its application but refrained from doing so.

We thank you for the time you have taken to read our appeal and for your positive response to our request for immediate action.

Sincerely,

Alka Patel  
Allen Dirrim  
Angela Landers  
Arielle D. West  
Arlene Beckwith  
Ashley Snyder  
Autumn Snyder  
Barbara G. Driscoll  
Bill Karr  
Bill Snyder  
Bluma Chernobelsky  
Bruce Pollock  
Cali Baxter  
Carmen A. Olmo  
Carole Pollock

Carolina Gallardo-Magaña  
Carolyn Beaver  
Cary Verstynen  
Chelsea Gray  
Chris Conte  
Clarence E. Redman  
Cristy Fredrick  
Curt Ingram  
Dan Tullis  
Daniel Estabrook  
David Wolf  
Derek Hawthorne  
Desiree Reyes  
Dexter Kelly  
Diane Sabol

Diane Sherlock  
Diego Mendoza  
Don Singer  
Donald T. Hoover  
Dorothy F. Thomas  
Edward Fredrick  
Eleanor M. Hovaten  
Elizabeth Garcia  
Elizabeth Rinnander  
Evelina Bartolini  
Frank Laza  
Gail Smith Estabrook  
Gayle Laza  
Gene Snyder  
George J. Arglen

Gregory Hill  
Helen Green  
Ingrid Schuh  
Jacque Martinez  
Jacqueline E. Tedeschi  
James C. Bizzelle  
James P. West  
Janis Pulliam  
Jerry Word  
John J. O'Brien  
Jon Huydae  
Juan Magaña  
Judith A. Dixon  
Kathleen Reed  
Leonard Shulman  
Leslie Herrera  
Lori Snyder  
M. Wendell Morrissett  
Maguhild Beck  
Marc Morris  
Marilyn Osenbaught

Martin Buse  
Marty Howard  
Matthew Kelly  
Melinda Cater  
Michelle Morris  
Nancy Horwitz  
Nancy J. Davis  
Nancy Pederise  
Nong J. O'Brien  
Ofelia Lazano  
Patricia (Kim) Henriksen  
Paul Copeland  
Reta Singer  
Richard D. Erlich  
Richard Green  
Robert O'Riley  
Rose LePonne  
Ruby Durias  
Ruth Anita Redman  
Samuel Bradbury  
Samuel Peck

Sandra Kelly  
Sandy Diaz  
Sergio Solis Jr.  
Sharon V. Dameron  
Sheila Carrigan  
Shelly R. Johnson  
Sheryle Milmont  
Sofia Vega  
Susan Peck  
Sydney Kaye McFarland  
Tasha Vivelos  
Tong (Sunny) Sun  
Veronica Miranda  
Victoria Dixon  
Vidar Bech  
Virginia F. Johnson  
William G. Schneberg  
William Gary McFarland  
William S. Berger  
Yoel Wazana