

CHANNEL ISLANDS NEIGHBORHOOD COUNCIL

PROUDLY REPRESENTING 1,811 HOMEOWNERS

1237 South Victoria Avenue, Box 504

Oxnard, CA 93035

Email: Info@CINeighbors.com

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July 24, 2018

Los Angeles Regional Water Board Commissioners
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

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

Copy: ✓ Cassandra D. Owens, LARWQB Chief, Industrial Permitting Unit
Rosario Aston, LARWQB Staff Representative

Attached: Additional Individuals Copied Via Email

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 are members of a Neighborhood Council in the City of Oxnard who, along with the greater community here in Ventura County, have recently experienced an extremely serious condition affecting the waters of the Channel Islands Harbor. For this reason, 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 1957,

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, 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.

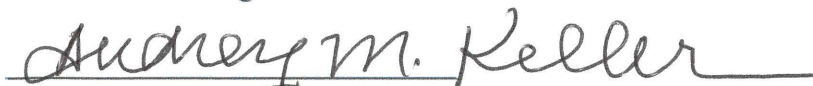
Further, the picture becomes more complex when you are made aware that this same canal appears to serve as the irrigation run-off for miles of farm fields, thus infusing chemicals and fertilizers into the water which as of now - and as a result of the canal blockade, are flowing directly back into the 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,

Channel Islands Neighborhood Council



By: Audrey Martinez-Keller, Chair

Carole Taylor, Vice Chair

Meggie Hawthorne, Secretary

Patricia Younis, Treasurer

Connie Heagy, Member-at-Large

Reta Singer, Member-at-Large

818 292-0447

ADDITIONAL PERSONS COPIED VIA EMAIL

Tim Flynn	Mayor, City of Oxnard
Carmen Ramirez	Mayor Pro-Tem, City of Oxnard
Bryan A. Macdonald	Council Member, City of Oxnard
Oscar Madrigal	Council Member, City of Oxnard
Bert Perello	Council Member, City of Oxnard
Alex Nguyen	City Manager, City of Oxnard
Steve Bennett	Supervisor, 1 st District, County of Ventura
Linda Parks	Supervisor, 2 nd District, County of Ventura
Kelly Long	Supervisor, 3 rd District, County of Ventura
Peter C. Foy	Supervisor, 4 th District Chairman of the Board, County of Ventura
John Zaragoza	Supervisor, 5 th District, County of Ventura
Rosa Gonzales	Clerk Of The Board, County of Ventura
Mark Sandoval	Director, Ventura County Harbor Dept
Steve Kinney	Exec. Director, Channel Islands Lessees Assn
Greg Schem	President, Channel Islands Lessees Assn
Steve Hudson	District Director, California Coastal Commission, South Central Region
Members	Channel Islands Neighborhood Association