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July 24, 2018

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Madelyn Glickfeld  
Regional Water Quality Control Board  
320 W. 4<sup>th</sup> 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,


The main reason that we purchased our home here in the Channel Island Harbor was its great water quality. Now we have very poor water quality since the closure of the NRG Mandalay Peaker plant on March 31, 2018. Not only did they stop the cooling pumps that provided circulation in our very long harbor, but for some reason the state had the Edison canal blocked on both the plant inlet and outlet, preventing any water circulation back to the ocean. Now we have sea life dying and the threat of massive sea life loss in future months.

A few key facts:

- CI Harbor used to be one of the cleanest harbors in the state due to the water flow through the Edison Canal, and now it's becoming one of the worst
- When the city and county agreed to develop Westport and Seabridge, they created an unusually long harbor, and it was understood that the water needed to be continually circulated to prevent major harbor deterioration, but nothing was done upon closure of the NRG power plant
- Our sea life is being threatened along with overall water quality due to very low oxygen levels
- We are at risk of a major catastrophe as occurred at King Harbor in Redondo Beach in 2011
- Property values will erode, and businesses may leave as the harbor stagnates, negatively impacting county and city revenues
- The city hired two marine biologists to assess the situation and their findings are alarming. The main culprit is algae bloom that results from several factors including rising water temperature and increased nutrients from nearby agriculture run off. But the closure of the plant and Edison Canal flow to the ocean by the plant is a key contributing factor.
- When NRG was directed to close the plant, there was no provision for an alternative path for the runoff that enters the canal north of Wooley Road where there are major agriculture fields. Now that runoff is running back into our harbor, adding more nutrients that contribute to algae growth, compounding the problem.
- The city is planning on installing 7 aerators at the back end of the harbor, but that will have negligible impact on our water quality and may actually result in great algae bloom.
- We believe that if the Edison Canal is reopened to allow circulation back to the ocean by the Mandalay plant, our harbor will be restored to its former clean state. More efficient pumps may be required to facilitate the circulation, but they will not need to run very often, as evidenced by the fact that the plant only ran 120 days at 6-8 hours/day over the past few years and the circulation was sufficient. New pumps can also be solar-powered.

Oxnard and its harbor residents need your help to allow us to reopen the flow in the Edison Canal to help correct this current problem before it gets much worse.

Thank you for your consideration,



Frank Sullivan