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CA-RWQCB

July 26, 2018

Los Angeles Regional Water Board Commissioners
C/O Rosario Aston, LARWQB Staff Representative
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

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 who live in the Channel Islands Harbor communities, along with the greater community here in Ventura County, have recently experienced a 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 an effort to bring to your attention a matter of grave concern.

This Harbor, which is the fifth largest recreational harbor in the State of California, has often been cited as the cleanest in the State. Now, sadly, I 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, has had a very negative effect on the 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 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, to require NRG to reinstate the pumps operations or otherwise facilitate the outflow of the Edison Channel waters, until such time as an alternate method of water circulation and flushing for the Channel Islands Harbor can be determined and implemented.

We believe that when the decision to allow early cessation of the NRG 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 waters of 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 impede 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. The prediction of an El Nino for the winter of 2018-19, if it brings strong rainfall, as is often the case for this area with an El Nino condition, that run off will increase many fold.

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,
Lauraine Effress

