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CA-RMOCB

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July 24, 2018

Los Angeles Regional Water Quality Control Board
c/o Rosario Aston, LARWQB Staff Representative
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
 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 Board Members:

The community of Oxnard in Ventura County has recently experienced a serious issue affecting the waters of Channel Islands Harbor, and I wish to bring this matter to your attention.

Channel Islands Harbor has recently suffered a devastating blow to its pristine condition. In the Board's decision to accommodate the NRG Mandalay Generating Station early shut-down in accordance with the NPDES mandate for closure of water-cooled generating stations, a dramatic negative effect on the Channel Islands Harbor waters and its aquaculture has been experienced. The City of Oxnard and its community organizations have substantive quantitative evidence that, because of this generating station shut-down, the Harbor's circulation system has been disrupted causing a significant negative impact to both the water and the marine life. This circulation system, of which the Generating Station's circulation pumps are a critical component, has operated in this Harbor from its completion in 1965, has now been completely physically impeded.

With due respect for your authority in this matter, I request 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. I urge that the Board, concurrently, require NRG to reinstate the pump operations or otherwise facilitate the outflow of the Edison Channel waters into the ocean until such time as an alternate method of water circulation and flushing for the Channel Islands Harbor can be determined and implemented.

These pumps drew a significant amount of water from Channel Islands Harbor via the Edison Canal (aka Mandalay Canal), and as a result pulled clean, oxygenated water into the Harbor through its entrance at Hollywood Beach. I am confident that when you responded positively to NRG's request for approval of the early shutdown of its operation, the Board was not fully informed of the ecological impact that its decision would have on the vibrant and healthy Channel Islands Harbor. It is possible 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, please be aware that the Edison Canal appears to serve as the irrigation run-off for acres of adjacent farm fields, thus infusing chemicals and fertilizers into the water which, as a result of the canal blockade, are flowing directly back into the Harbor itself with no filtration of any kind. This appears to be causing an influx of nutrients into the Harbor and disrupting its ecological balance. NRG should have been able to predict the disastrous effects this shutdown would have on the entire Harbor and had an obligation to disclose this situation in its application.

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. Channel Islands Harbor, which is the fifth largest recreational harbor in the State of California, has often been cited as the cleanest in the State. I believe that the Board's decision has inadvertently caused this harbor to be one of the worst in the State.

Thank you for the time you have taken to read my appeal, and for your positive response to this request for immediate action.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee Hilbert". The signature is fluid and cursive, with the first name "Lee" and last name "Hilbert" clearly distinguishable.

Lee Hilbert

Director and Member, Channel Islands Waterfront Homeowners' Association

Cc: Channel Islands Neighborhood Council