

Aston, Rosario@Waterboards

From: Robert Chatenever <chatenever@yahoo.com>
Sent: Monday, July 23, 2018 2:41 PM
To: Aston, Rosario@Waterboards
Cc: Davidw@epamail.epa.gov; Robyn@epamail.epa.gov; Becky Mitschele; kenneth.wong@usace.army.mil; bryant.chesney@NOAA.gov; Marylou.Taylor@energy.ca.gov; jeff_phillips@fws.gov; Paznokas, William@Wildlife; Bergquist, Sutida@Waterboards; Henry, Teresa@Coastal; tjohnson@wrld.org; tsmith@ladpw.org; gerhardt.hubner@ventura.org; amoe@healthebay.org; melissa@lawaterkeeper.org; Ashley.Golden@ci.oxnard.ca.us; Bruce@lawaterkeeper.org; jweiner.venturacoastkeeper@wishtoyo.org; cleanwater@sfo.com; damon.wing@ventura.org; bweber@EnvironmentalDefenseCenter.org; smiller@venturaharbor.com; vmusgrove@ci.ventura.ca.us; pjenkin@sbcglobal.net; jessie@sbck.org; george.watland@sierraclub.org; alexander.nguyen@ci.oxnard.ca.us; Purdy, Renee@Waterboards; ebokaw@cityofventura.net; jgravender@environmentnow.org; cmandelbaum@environmentnow.org; Small, Mary@SCC; Wanger, Al@Coastal; matiwaiya@wishtoyo.org; Owens, Cassandra@Waterboards; Jauregui, Renan@Waterboards; Carlos, Alex@Waterboards; Chen, Jau Ren@Waterboards; Morris, Cris@Waterboards; arthur@lawaterkeeper.org; sarah.torres@pgenv.com; james.ashby@pgenv.com; jmatthews@nrdc.org; cbell@nrdc.org; Colby, Russ@Waterboards; chris.williamson@ci.oxnard.ca.us; Johnson, Julie@Waterboards; Tim Flynn; Bert Perello; Bryan MacDonald; Carmen Ramirez; Oscar Madrigal; mark.sandoval@ci.oxnard.ca.us; Thien Ng; Ashley Golden
Subject: Water Quality Emergency in Channel Islands Harbor NPDES No. CA0001180, CI No. 2093
Attachments: Map of Edison Canal.kmz

Dear Mr. Aston et. al.:

Thank you for your response to the concerns that I raised regarding the deterioration of water quality in Channel Islands Harbor since the shutdown of the NRG pumps at the north end of Edison Canal. By way of information for those on the distribution of this email, I have attached a map showing the layout of our harbor. Since 1963 when the harbor was constructed, the water that the power plant pumped out of the north end of the Edison Canal caused an inflow from the harbor entrance at the south end of the harbor. Millions of gallons per day were circulated which mitigated the effects of nutrients that made their way into the Edison Canal from the surrounding community and farmland. Now that the pumping has stopped, the 2.3 miles of canal have become a stagnant body of water collecting nutrients with no place to go. They are slowly contaminating the rest of the harbor as the tides ebb and flow.

I can appreciate that it is impractical to run the NRG pumps for the sole purpose of flushing out the harbor. However, for the past 20 years, the State Water Boards and the US Environmental Protection Agency have regulated the runoff of storm water to reduce harmful pollutants and fertilizer draining into our rivers, lakes and ocean. One of the reasons for the regulation is to ensure that we are managing water in a sustainable way that preserves our resources for future generations. If the existing dead-end geometry of Channel Islands Harbor is allowed to persist, the continued build-up of nutrients will inexorably lead to the destruction of most wildlife in the harbor ecosystem. There are options that we can pursue before we are in a position where it is too late to rescue the harbor:

1. The north end of the Edison Canal is quite close to the ocean. If a channel could be opened up between the end of the canal and the ocean, the tide would be allowed to enter and leave from both ends of the harbor. This

would drastically reduce the distance from the northern half of the harbor to a source of uncontaminated water, while at the same time, relieving the canal from the concentrated effects of storm water runoff.

2. The NRG plant has been pumping at a very reduced rate over the past years, but it has been sufficient to keep the harbor water crystal clear. Perhaps there is an option for a very reduced pumping system to maintain the harbor water quality.

3. It is my understanding that the owner of the Edison Canal (Centerpoint Energy) is seeking to divest itself of it's interest. If that is true, there is an opportunity for either the City, the County or the State to take ownership and develop it into a valuable resource, including recreation, ground water recharge, and or course, a means to protect the existing harbor water quality.

I am neither an expert or a developer, but I can see the handwriting on the wall if we do nothing. I hope you will not ignore this opportunity to protect the future water quality of Channel Islands Harbor. I also request that you pass this email along to whomever is considering the NRG permit withdrawal request referenced in the subject line of this email.

Thank you in advance for your consideration.

Robert Chatenever
Resident at Channel Islands Harbor

On Thursday, July 19, 2018, 5:25:51 PM PDT, Aston, Rosario@Waterboards <Rosario.Aston@waterboards.ca.gov> wrote:

Dear Mr. Robert Chatenever.

Attached is the Regional Water Board and State Water Board (collectively Water Boards) staffs response to your emails dated June 29, 2018, and July 2, 2018, regarding your concerns to the recent conditions in the Channel Islands Harbor.

Thank you,

Rosario Aston

Los Angeles Regional Water Quality Control Board

320 W. 4th Street, Suite 200

Los Angeles, CA 90013

Phone - 213.576.6653

Fax - 213.576.6660

Rosario.Aston@waterboards.ca.gov

From: Robert Chatenever [mailto:chatenever@yahoo.com]

Sent: Monday, July 02, 2018 2:11 PM

To: Aston, Rosario@Waterboards <Rosario.Aston@waterboards.ca.gov>; Davidw@epamail.epa.gov; Robyn@epamail.epa.gov; Becky Mitschele <Mitschele.Becky@epa.gov>; kenneth.wong@usace.army.mil; bryant.chesney@NOAA.gov; Marylou.Taylor@energy.ca.gov; jeff_phillips@fws.gov; Paznokas, William@Wildlife <William.Paznokas@wildlife.ca.gov>; Bergquist, Sutida@Waterboards <Sutida.Bergquist@waterboards.ca.gov>; Henry, Teresa@Coastal <Teresa.Henry@coastal.ca.gov>; tjohnson@wrdd.org; tsmith@ladpw.org; gerhardt.hubner@ventura.org; amoe@healthebay.org; melissa@lawaterkeeper.org; Ashley.Golden@ci.oxnard.ca.us; Bruce@lawaterkeeper.org; jweiner.venturacoastkeeper@wishtoyo.org; cleanwater@sfo.com; damon.wing@ventura.org; bweber@EnvironmentalDefenseCenter.org; smiller@venturaharbor.com; vmusgrove@ci.ventura.ca.us; pjenkin@sbcglobal.net; jessie@sbck.org; george.watland@sierraclub.org; alexander.nguyen@ci.oxnard.ca.us; ebokaw@cityofventura.net; jgravender@environmentnow.org; cmandelbaum@environmentnow.org; Small, Mary@SCC <Mary.Small@scc.ca.gov>; Wanger, Al@Coastal <Al.Wanger@coastal.ca.gov>; matiwaiya@wishtoyo.org; Owens, Cassandra@Waterboards <Cassandra.Owens@waterboards.ca.gov>; Jauregui, Renan@Waterboards <Renan.Jauregui@waterboards.ca.gov>; Carlos, Alex@Waterboards <alex.carlos@waterboards.ca.gov>; Chen, Jau Ren@Waterboards <Jauren.chen@waterboards.ca.gov>; Morris, Cris@Waterboards <Cris.Morris@waterboards.ca.gov>; arthur@lawaterkeeper.org; sarah.torres@pgenv.com; james.ashby@pgenv.com; jmatthews@nrdc.org; cbell@nrdc.org; Colby, Russ@Waterboards <Russ.Colby@waterboards.ca.gov>; chris.williamson@ci.oxnard.ca.us

Subject: Fw: Water Quality Emergency in Channel Islands Harbor

Dear all -

I am forwarding you the attached email because evidently each of you is somehow involved with the NRG request to terminate their permit to operate their cooling water pumps for the Mandalay Bay power station. I presume that each of you has a role or responsibility in protecting water quality, marine life and the environment.

The pumps at the Mandalay Bay power station have been an integral part of the ecosystem of the Channel Islands Harbor since it was built in 1963. Now that the pumps have been turned off, the ecosystem is dying. See the following facebook video that was recorded by a local dive service. It is heartbreaking.

<https://www.facebook.com/100010195779926/videos/647874835562370/?id=100010195779926&fref=nf>

I believe that we all have a responsibility to protect the ecosystem that we created when the harbor was built. I implore you to get involved to stop this environmental tragedy that is unfolding right before our eyes.

Robert Chatenever

Resident at Channel Islands Harbor

----- Forwarded Message -----

From: Robert Chatenever <chatenever@yahoo.com>

To: Tim Flynn <tim.flynn@ci.oxnard.ca.us>; Bert Perello <bert.perello@ci.oxnard.ca.us>; Bryan MacDonald <bryan.macdonald@ci.oxnard.ca.us>; Carmen Ramirez <carmen4oxnard@gmail.com>; Oscar Madrigal <oscar.madrigal@oxnard.org>

Cc: chris.stephens@ventura.org <chris.stephens@ventura.org>; sectyrodriguez@calepa.ca.gov <sectyrodriguez@calepa.ca.gov>; rohimah.moly@cpuc.ca.gov <rohimah.moly@cpuc.ca.gov>; Katherine.Faick@waterboards.ca.gov <Katherine.Faick@waterboards.ca.gov>; John.Robertson@waterboards.ca.gov <John.Robertson@waterboards.ca.gov>; Dave Copper <dcopper93035@gmail.com>; Carlos Brea <cbrea@verizon.net>; Steve Patton <stevepatton791@gmail.com>; Harold Robertson <haroldwrobertson@gmail.com>; Kris Bugbee <kbugbee356@roadrunner.com>; Audrey Martinez-Keller <audrey@swissfamilykeller.com>; Werner Keller <wkeller@kellerpartners.com>; Rick Belmonte <roccobelmm@gmail.com>; Lauraine Effress <sparerib@roadrunner.com>; Mike Mercadante <mjmercadante@gmail.com>; Akshay Manek <a_manek@hotmail.com>; Keith Beckwith <keith@keith4beach.com>

Sent: Friday, June 29, 2018, 10:37:29 AM PDT

Subject: Water Quality Emergency in Channel Islands Harbor

In 2010 the State Water Resources Control Board adopted a policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling. According to NRG, the water-cooled power plant at Mandalay Bay was shut down in February of this year and the cooling water pumps that pull water through Channel Islands Harbor were last run in March. Within the past two weeks, the water quality and clarity in the harbor and surrounding residential areas has been visibly and dramatically affected. It is ironic that the policy that was designed to protect marine life and required the shutdown of the power plant may be causing exactly the opposite effect. The harbor which has always been a jewel in the City of Oxnard, County of Ventura, is quickly becoming a smelly eyesore and may be due to the lack of water circulation. Instead of protecting marine life, it is killing marine life and destroying the beauty of the harbor.

I am aware that the City has ordered water quality testing and is in the process of hiring a marine biologist and consulting with water aeration specialists. Regardless of the test results, giving a scientific name to the problem does not change the solution. I think we can all agree that there is a significant likelihood that we will not be able to restore the prior water clarity and marine habitat with aeration alone, and that turning pumps back on will be the only way to restore the water quality.

My reason in sending this email is two-fold:

1. Although the council has had a very adversarial past relationship with NRG, it is time to reach out to them to see what would be required to start pumping again. There is urgency to get this conversation started now. If we wait until all the studies are in and proposals are analyzed, we may find ourselves at a point where the pumps have been removed or otherwise disabled in a way that would make it impractical to turn them on again.

2. By copy of this email to the California State Water Resources Control Board and other regulatory agencies, I am requesting information on what would have to happen to allow NRG to start pumping again. There are four pumps of 44000 gpm each. It may be possible that we might be able to restore the water quality with only one pump running. If that is the case, the water velocity through the inlet screens will be reduced by 75% and any impact of entrainment will be far less than when the generating plant was in operation.

I look forward to receiving responses.

Robert Chatenever