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10 August 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

BY EMAIL

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

Re:: Notice to Thomas DiCiolli, Plant Manager, Dated 28 June 2018
Mandalay Generating Station Tentative Termination of WDRs etc., Oxnard CA
California South LP Mandalay
NPDES No. CA00001180 / CI No. 2093

Dear Honorable Commissioners:

My wife and I have lived in Oxnard Shores, close to the Channel Islands Harbor, for five years. During this time, we have thoroughly enjoyed the Harbor, including its offerings of water sports and other activities.

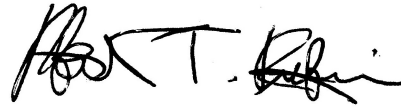
As you are aware, the Harbor water quality unfortunately has degraded severely since the NRG Mandalay Generating Station cooling pumps were shut down in March 2018. These pumps circulated 50 million gallons of seawater per day from the Channel Islands Harbor through the 2.3-mile-long Edison Canal and out to the Pacific Ocean, thus ensuring needed influx of fresh seawater through the Harbor entrance. After the pumps were shut down, the Harbor water became stagnant, especially in the northern part of the Harbor, and an unwanted algae bloom resulted, which has been only partially mitigated by emergency measures such as aerators.

As noted by others in their written communications to you, the Regional Water Board's Order that allowed NRG to shut down the Edison canal pumps and block the only compliant discharge for agricultural and storm water run-off is inappropriate and possibly illegal. Without any discharge point, the agricultural and storm waters that flow into the Canal have nowhere to go, except back into the Harbor at low tide. We request that the Board take immediate action to have the pumps turned back on, in the most expedient way possible. If, in your estimation, it is not NRG's

responsibility to re-activate the pumps, since NRG shut down their generating plant, then Ventura County, the State of California, the cities of Oxnard and Port Hueneme, or a combination thereof, should be allowed / directed to run and maintain the pumps. The weather continues to get warmer, oxygen levels in the Harbor will continue to decline, and the Harbor's aquatic environment will continue to deteriorate, to the detriment of all residents and visitors who utilize the Channel Islands Harbor, as well as the businesses therein.

Thank you for your consideration of this letter.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Robert T. Rubin". The signature is stylized with a large, looped "R" and a cursive "Rubin".

Robert T. Rubin