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August 9, 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:

It appears as if the NRG Mandalay Generating Station shut-down is causing significant quantitative negative results to the water. This condition was anticipated prior to the construction of the Seabridge development and resulted in agreements between the Seabridge and the City of Oxnard and Seabridge and adjacent neighborhoods that had contractual remedies in the potential consequences of water degradation caused by a Generating Station shut-down. Therefore, the current negative change in our water quality comes as no surprise.

When the State Water Board effectively shut down the Mandalay Plant, were the adverse effects of the loss of coolant flow considered? Was anything like a cost-benefit analysis done – costs being such things as: change to the ecosystem, replacement of fish and birds that feed on fish with their wetlands counterparts, loss of values in homes, loss of customers to contiguous shops and restaurants, loss of boating population and consequent loss of marinas, and all the tax revenue losses that the foregoing would cause? Accordingly, shouldn't the State be required to compensate the City of Oxnard to remediate this draconian mistake and all these problems?

The Mayor's comments notwithstanding, the installation of the fix should be started now. There appears to be sufficient biological evidence that the lack of aeration is the issue and will remain the issue no matter how much effort will go into finding more definitive causation data. Additional collection of data will likely serve only an administrative requirement to justify and package a request to the State for financial support. That's important, but it is not necessary to be completed before the installation of pumps or aerators or both. (A large field of aerators will not do much for the aesthetics of Mandalay Bay, so it would be expected that a combination of both would be the most reasonable).

Regards,

A handwritten signature in blue ink that reads "Ronald Consiglio". The signature is written in a cursive, flowing style with a large initial 'R'.