

Ronald J. Brenner
2251 Kingsbridge Lane
Oxnard, California 93035
310.344.3100 Ron@RJBrennerCo.com

August 6, 2018

Los Angeles Regional Water Board Commissioners
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

Copy: Cassandra D. Owens, LARWQB Chief, Industrial Permitting Unit
Rosario Aston, LARWQB Staff Representative

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

Sent via Email: Rosario.Aston@waterboards.ca.gov

Honorable Commissioners:

We are writing to add our names to the list of clean water advocates requesting your help and support, regarding the matter of the Channel Islands Harbor that has become seriously negatively affected by the lack of flushing. Flushing has stopped as a result of the shutdown of the pumps that supported the Mandalay Generating Station.

We are, today, in just the beginning of what could become a completely degraded harbor as time, rain, storm water and continued agricultural discharges take their toll.

We understand that the matter before your Board is the release of the operator from the NPDES permit and that, perhaps, this request does not dovetail exactly with the agenda item. Nevertheless, we are compelled to ask for your immediate attention to the matter.

**BEFORE YOU AGREED ON THE SHUTDOWN OF THE PUMPS,
WERE YOU MADE AWARE OF THE REPOCUSSION OF THE SHUTDOWN?**

The Channel Islands Harbor, all sections of it, were designed and constructed in such a way that the Harbor would flush effectively from the start. This main Harbor and each of its subsequent sections were each constructed by utilizing the Mandalay Canal (aka the Edison Canal) as its water pathway. The Mandalay Canal was constructed in the early 50's, before either the main Channel Islands Harbor or any of the extending harbors were constructed. The design of the Harbor as a whole relied on a naturally-occurring seawater entry point and a reliable seawater exit point. The current, which flows south to north at this location, enters the Channel Islands Harbor not far from the Edison Canal's beginning point at Port Hueneme and exits at the Canal's termination which is the entry into the Mandalay Generating Station pumps. The seawater then passes through the pumps and exits back into the ocean, completing the Harbor's natural flushing pattern.

The cessation of the pumps completely stops the flushing essential for water quality

Unlike many harbors and marinas in California, this harbor was actually constructed with flushing in mind and for that reason it can lay claim to its well-deserved title as one of the cleanest in the state of California.

We implore you to be sure to pay attention to this urgent matter and bring positive resolution to the situation. We understand that there are all sorts of political interests at work, and would hope that you are able to bring focus to the preservation of water quality in this key California harbor.

Citizens of the Harbor appreciate your proactive and timely response.

Sincerely,



Ronald J. Brenner