

Channel Islands Harbor Lessees Association 3600 S. Harbor, Blvd. #119 Oxnard, CA 93035

## BOARD OF DIRECTORS

August 3, 2018

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Executive Director Steven L. Kinney slkinney@ceoexpress.com (805) 443-1235 RE: Notice to Thomas DiCiolli, Plant Manager, 6/28/18: Mandalay Generating Station Tentative Termination of WDRs, etc., Oxnard CA. California South LP Mandalay. NPDES No. CA00001180 / CI No. 2093

Honorable Commissioners:

On authorization of this Association's Board of Directors, I am writing to urge your attention to the pressing issue of deteriorating water quality at Channel Islands Harbor. The Lessees Association represents all of the commercial development interests, including all of the apartment, hotel, office, and retail developments, at the Harbor. The Lessees, as with all residents around the harbor, have a direct and compelling interest in the water quality of the Harbor. We have taken it as a point of pride for decades that Channel Islands Harbor has consistently been regarded as having the best water quality of the man-made harbors along the coastline. We now have an equally serious concern that the water quality appears to be in jeopardy.

I draw your attention to a letter to the RWQCB dated July 24, 2018 from the Channel Islands Neighborhood Council. Since that organization represents all of the residential neighborhoods fronting on the harbor, it could be considered our counterpart with a residential perspective. Without reiterating all of the points of that excellent summary of the situation at the harbor, I will simply state that our Board shares the view that the closure of the pumps at the NRG Mandalay Generating Station is a proximate cause of the deteriorating water quality in the harbor. RWQCB Letter August 3, 2018 Page Two

In our view, it is inconceivable that the Harbor's natural flushing action through the Edison Canal and the pumps at the Mandalay Plant, which was incorporated into the original design of the harbor sixty years ago and which has performed effectively throughout that time, could be abruptly terminated, by closing down the pumps, without expecting exactly the deteriorating effects to the water and marine life which we see happening now.

We join with our residential partners in the harbor community in the request that the Board require NRG to reinstate the pumping operations at the plant or otherwise facilitate the outflow of the Edison Canal waters until such time that an alternate method of water circulation and flushing for the Channel Islands Harbor can be determined and implemented.

Thank you for your due consideration of this issue and of our request.

Sincerely,

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Steven L. Kinney Executive Director

Cc (by email):

- ~ Channel Islands Harbor Lessees Association Board of Directors
- ~ Cassandra Owens, LARWQCB Chief, Industrial Unit
- ~ Rosario Aston, LARWQCB Staff
- ~ Ventura County Board of Supervisors
- ~ Michael Powers, County of Ventura CEO
- ~ Mark Sandoval, Director, County Harbor Department
- ~ Oxnard City Council
- ~ Alex Nguyen, Oxnard City Manager
- ~ Channel Islands Neighborhood Council