

THOMAS H. WARDEN

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OXNARD, CALIFORNIA 939035

July 24, 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

Re: Notice to Thomas DiCiolli, Plant Manager Dated June 28,
2018
Mandalay Generating Station Tentative Termination of
WDRs, etc., Oxnard, California
California South LT Mandalay
NPDES No. CA0000180/CI No. 2093

Dear Honorable Commissioners:

We, along with the greater community in Ventura County, have recently experienced an extremely serious condition affecting the quality of the water in the Channel Islands Harbor. We have gathered with community stakeholders, boaters, kayakers, swimmers, visitors, both within and without the boundaries of our neighborhood council in a mighty effort to bring to your attention a matter of grave concern.

One does not have to live on the water or be a "water person" to appreciate the value of beautiful, clear and clean Channel Islands Harbor. This Harbor, which is the fifth largest recreational harbor in the State of California, has often been cited as the cleanest in the State. Sadly, the Harbor has recently suffered a devastating blow to its pristine condition. We regret to tell you that in your effort to accommodate the NRG Mandalay Generating Station early shutdown in accordance with the NPDES mandate for closure of water cooled generated stations, this significant decision has had a dramatic negative effect on the Channel Islands Harbor waters and its aquiculture.

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We have substantive evidence that because of this shutdown, the Los Angeles Region Water Board Commissioners circulation system that has existed in this Harbor from its construction completion in 1965, has been completely physically impeded causing significant quantitative negative results to both the water and the marine life.

With due respect to your authority in this matter, we are, nonetheless, requesting with the strongest urgency that the Board immediately reverse this decision to allow suspension of the NRG NPDES permit and acceptance of a shutdown of its circulation pumps prior to the legally mandated shutdown date. We urge that the Board, concurrently, require NRG to reinstate the pumps operations or otherwise facilitate the outflow of the Edison Canal waters until such time an alternate method of water circulation and flushing for the Channel Islands Harbor can be determined and implemented.

We further request an Environmental Impact Report be made of the negative impact on the surrounding area, both in and out of the water, due to the shutdown of the circulation system to Mandalay Power Plant and Edison Canal. We believe that when you responded positively to NRG's request for approval of the early shutdown of its operation which, in simple terms, resulted in the cessation of the pumps that used the waters from the Channel Islands Harbor via the Edison Canal (aka Mandalay Canal), the Board was not fully informed of the ecological impact that this decision would have on the vibrant and healthy Channel Islands Harbor. It is our understanding that it was not clearly disclosed or explained to you in the NRG Closure Application that the pumps captured and used the waters from what is, for all intent and purposes, the end loop of the entire Harbor's flushing system that shutting down the pumps used by Mandalay would totally impede the tidal outflow of the waters.

Further, the picture becomes more complex when you are made aware that this same canal appears to serve as the irrigation runoff for miles of farmland adjoining the canal; thus, infusing chemicals and fertilizers into the water which, as of now - and as a result of the canal blockade, are flowing directly back into the Harbor itself with no filtration of any kind.

Los Angeles Region Water Board Commissioners

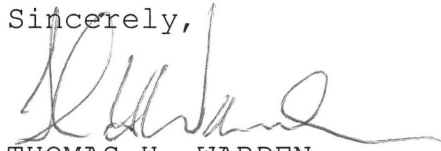
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Frankly, we believe NRG should easily have predicted the disastrous effects the shutdown would have on the entire Harbor and consequently, had an obligation to disclose the situation and the foreseeable results of the closure in its application, but refrained and neglected to do so. Whether or not this omission is intentional is up for debate.

We thank you for the time you have taken to read this appeal and for your positive response to our request for immediate action on behalf of the Channel Islands Harbor community.

Sincerely,



THOMAS H. WARDEN
Staff Commodore,
Channel Islands Yacht Club
Staff Commodore
Association of Santa Barbara Yacht
Clubs

THW/clb