

To:

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Los Angeles Regional Water Quality Control Board

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From:

Tom McNally

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Regarding: Mandalay Generating Station Tentative Termination of WDRs etc.,
Oxnard CA

California South LP Mandalay

NPDES No. CA00001180 / CI No. 2093

I am writing in regards to the deterioration of water quality in Channel Islands Harbor since the shutdown of the NRG pumps at the north end of Edison Canal in Oxnard, CA.

Since 1963 when the harbor was constructed, the water that the power plant pumped out of the north end of the Edison Canal for cooling purposes caused an inflow from the harbor entrance at the south end of the harbor. Now that the pumping has stopped, the 2.3 miles of canal have become a stagnant body of water collecting nutrients with no place to go.

I think we should consider the practicality of running the NRG pumps; on a regular but limited basis; for the purpose of flushing out the harbor. If the existing dead-end layout of Channel Islands Harbor is allowed to remain, the continued build-up of runoff nutrients will eventually lead to the destruction of most wildlife in the harbor ecosystem.

There are options that we suggest can be pursued before we are in a position where it is too late to rescue the harbor:

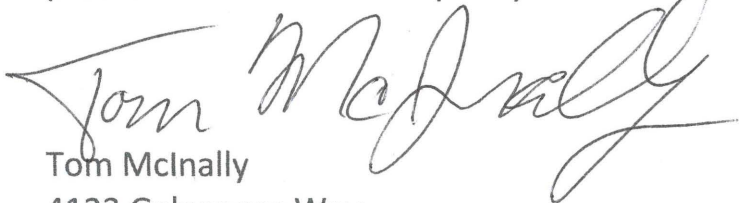
- The north end of the Edison Canal is quite close to the ocean. If a channel could be opened up between the end of the canal and the ocean, the tide

would be allowed to enter and leave from both ends of the harbor. This would drastically reduce the distance from the northern half of the harbor to a source of uncontaminated water, while at the same time, relieving the canal from the concentrated effects of storm water runoff.

- The NRG plant has been pumping at a very reduced rate over the past years, but it has been sufficient to keep the harbor water crystal clear. Perhaps there is an option for a very reduced pumping system to maintain the harbor water quality.
- It is my understanding that the owner of the Edison Canal (CenterPoint Energy) is seeking to divest itself of its interest. If that is true, there is an opportunity for either the City, the County or the State to take ownership and develop it into a valuable resource; including recreation; and a means to protect the existing harbor water quality.

I am a resident and regular observer of the water as I walk each day. The wildlife has definitely diminished and most of the seagulls have abandoned the north end of the harbor. I am not an expert or a developer, but I can see a high risk of a constant decline in the Channel Islands Harbor water quality if we do nothing.

Our hope you will help us remedy this situation and not let this opportunity to protect the future water quality of Channel Islands Harbor pass by.



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