

WERNER E KELLER

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August 6, 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 CA
California South LP Mandalay
NPDES No. CA00001180 / CI No. 2093

Dear Honorable Commissioners:

In your effort to accommodate the NRG Mandalay Generating Station's early shut-down in accordance with the NPDES mandate, you have, sadly, facilitated a significant environmental attack on the water quality of Channel Islands Harbor. Certainly, this was not your intent, but this is clearly your result.

Just that we share the same perspective: these out of date, inefficient Mandalay power plants had lost their contracts with SCE and were barely in use (5% of annual capacity or less). Market forces had, in fact, already retired these plants and facilities. However, the inadvertent consequence of your action is that one of California's major harbors now stands on the threshold of environmental disaster. This condition is being facilitated by an Agency whose specific mission is to protect California's waters:


The State Water Resources Control Board (State Water Board) was created to provide comprehensive protection for California's waters

From the Mission Statement of the California Water Resources Control Board

A critical first step would be for your Agency not to stand in the way of re-opening the Canal to the ocean. Obviously, specific engineering evaluation and a comprehensive plan would need to follow, but please don't do anything to make the current closure more permanent!

Thank you for your consideration.

Sincerely,



Werner E. Keller