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 4<sup>th</sup> 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

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

Dear Honorable Commissioners:

As homeowners along the Channel Island harbor we have noticed that with the closing of the Mandalay Power plant and the water pumps, the quality of the water has rapidly deteriorated.

One does not have to live on the water to appreciate and value the 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. Unfortunately, the bay has recently suffered a devastating blow to its pristine condition. In an effort to accommodate the NRG Mandalay Generating Station early shut-down in accordance with the NPDES mandate for closure of water-cooled generating stations, this closure has had a dramatic negative effect on the Channel Islands Harbor waters and its aquaculture. There appears to be evidence that because of this shut-down, the circulation system that has existed in this Harbor from its inception, is no longer functioning and the water quality is deteriorating.

We request that the Board immediately reverse its decision to allow suspension of the NRG NPDES permit and the acceptance of the 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 Channel waters until such time that an alternate method of water circulation and flushing for the Channel Islands Harbor can be determined and implemented.

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 Channel Islands Harbor.

Frankly, we believe NRG could easily have predicted the disastrous effects this shutdown would have on the entire Harbor and, consequently, had an obligation to disclose this situation in its application but refrained from doing so.

We thank you for the time you have taken to read our appeal and for your positive response to our request for immediate action.

Sincerely,

William Clark

William Clark

Candice Clark

**Candice Clark**