

Carmen Ramírez
Mayor Pro Tem

City Council

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August 9, 2018

Cassandra D. Owens
Chief, Industrial Permitting Unit
Los Angeles Regional Water Quality Control Board 320 West 4th Street, Suite 200
Los Angeles, CA 90013

Re: Tentative Order Terminating Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for Mandalay Generating Station

Dear Ms. Owens:

I am writing on behalf of the City of Oxnard regarding the Regional Water Quality Control Board's proposed termination of discharge permits for Mandalay Generating Station in Oxnard. Although the City does not advocate for continued operation of the Mandalay Generating Station and supports the State Water Board's order requiring the phase out of once-through-cooling (OTC) facilities, the City has significant concerns that terminating the permits may have unintended negative water quality consequences. The City asks that the Regional Board fully analyze any such impact before acting on the Tentative Order.

As you know, roughly four months ago, NRG California South shut down pumps at Mandalay Generation Station that drew water for OTC power plant operations. NRG presumably took this action to comply with the State Water Board's OTC Policy, which effectively required operations at Mandalay Generating Station to cease by 2020. Before NRG shut them down, the Mandalay pumps drew water from the two-mile long Edison Canal, which connects to the Pacific Ocean through Channel Islands Harbor.

In recent months, during a period of warm weather following the pump shutdown, residents of Channel Islands Harbor observed a marked decline in water quality in the harbor. The City retained experts to conduct water quality testing, and early results showed a large algae bloom in the harbor.

It is likely that this water quality degradation directly resulted from shutting down the pumps at Mandalay Generating Station. Although the City continues to study the issue, a 2001 analysis of water circulation in Channel Islands Harbor concluded that circulation would greatly diminish without pumping at Mandalay Generation Station. Most significantly, without pumping, water "residence" time in northern portions of the harbor would triple from five to fifteen days.

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Stakeholders continue to work on a long-term solution to this problem. But to stem any further water quality impacts to Channel Islands Harbor in the interim, some manner of pumping from the Edison Canal may need to resume. The most obvious location to discharge any pumped water would be through the current ocean outfall at Mandalay Generating Station.

The City is concerned that terminating the discharge permits associated with the outfall will impair any response to the water quality crisis in Channel Islands Harbor, including resumed pumping from the Edison Canal. As such, adoption of the Tentative Order could have reasonably foreseeable impacts to the harbor and surrounding waterways that would be detrimental to public health and the environment.

Before acting on the Tentative Order, the City urges the Regional Board to fully consider any such unintended impacts from eliminating discharge options necessary to maintain water quality in Channel Islands Harbor. We further ask that the Regional Board fully collaborate with the City and Ventura County to find a solution to this pressing water quality issue.

Very truly yours,

A handwritten signature in blue ink that reads "Carmen Ramirez". The signature is written in a cursive style with a stylized "R" and "Z".

Carmen Ramirez , Mayor Pro Tem City of Oxnard

cc: Rosario Anston, Water Resource Control Engineer, Los Angeles RWQCB Deborah Smith, Executive Officer, Los Angeles RWQCB