

**Alexander Nguyen**  
City Manager



**Office of the City Manager**

300 West Third Street  
Oxnard, CA 93030  
(805) 385-7430  
Fax (805) 385-7595  
[www.oxnard.org](http://www.oxnard.org)

December 22, 2020

Snejana Toneva  
Los Angeles Regional Water Quality Control Board  
320 West Fourth Street, Suite 200  
Los Angeles, CA 90013

**SUBJECT: City of Oxnard Public Comment to Ventura County Agricultural Irrigated Lands Group (VCAILG) Water Quality Management Plan (WQMP)**

Dear Ms. Toneva:

Since the decommissioning of the Mandalay Power Generating Station (Power Plant), the City of Oxnard (City) and residents from the Harbor communities of Harbour Island, Mandalay Bay, Seabridge, and Westport, who are collectively known as the Channel Islands Neighborhood Council (CINC,) have collaboratively been working to improve the water quality in the Channel Islands Harbor (Harbor).

In June 2018, an algal bloom occurred in Harbor. The bloom was followed by widespread low dissolved oxygen (DO) in the water, presumably related to the decomposition of the algae, warm weather, and the presence of nutrients within the waterways. The bloom and subsequent low DO event may have been related to changes in the circulation in Harbor that occurred after the Power Plant's cooling water pumps were decommissioned on March 29, 2018, as part of a mandate from the California State Water Resources Control Board.

In 2018 the City began nutrient sampling in the harbor. Sampling was conducted following two (2) rain events and during two (2) dry weather periods in fall 2018 and winter 2019 at 31 stations located in the Harbor and the privately-owned Edison Canal (Canal). This man-made canal is host to two separate agricultural run-off drains: the Doris and 5th Street drains. Nitrogen and phosphorus concentrations were elevated in the Canal following wet weather and were much lower during dry weather. This indicated a net influx of nutrients that contribute to algae growth in the Canal during wet weather, presumably from the surrounding agricultural fields.

The City has been steadfast in its approach to implementing nutrient source controls (e.g., agricultural runoff) to reduce nutrient loadings to the Harbor via the Canal. Since the City does not own the Canal, this approach will require stakeholders from agriculture, regulatory and municipal agencies, and the public. The Draft WQMP submitted to the Board by VCAILG fails to address real agricultural runoff concerns for the City and Harbor.

The McGrath Lake Coastal Responsibility Area, located within the Oxnard Plain and Coastal Watershed, includes two VCAILG monitoring sites: OXD\_CENTR and CIHD\_VICT. Data from the CIHD\_VICT is wholly missing from the 2020 WQMP.

Absent is a vital monitoring site located within the Canal, one of the central receiving bodies for agricultural runoff in the Responsibility Area. Without this critical monitoring site, valuable data reflecting actual agricultural runoff into the Canal and Harbor is missing. The proposed site would be located at the Doris drain (latitude 34.2038; longitude -119.2386) to capture the agricultural runoff that enters the Canal at this point and flows southward into the Harbor.

The City urges the LARWQCB to work with VCAILG to add this additional monitoring site.

Sincerely,



Alexander Nguyen  
City Manager