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December 21, 2018

Via Email

Philip G. Wyels
State Water Resources Control Board
Philip.Wyels@waterboards.ca.gov
watergualitypetitions@waterboards.ca.gov

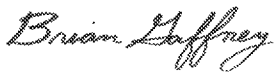
RE: SWRCB/OCC FILE A-2610
REQUEST TO HOLD PETITION IN ABEYANCE

PETITION OF ECOLOGICAL RIGHTS FOUNDATION FOR REVIEW OF ORDER R2-2018-1012 NPDES NO. CA0038598, ADMINISTRATIVE CIVIL LIABILITY FOR SEWER AUTHORITY MIDCOASTSIDE WASTEWATER TREATMENT PLANT AND ITS ASSOCIATED WASTEWATER COLLECTION SYSTEM, HALF MOON BAY, CALIFORNIA; SAN MATEO COUNTY; ISSUED BY SAN FRANCISCO BAY REGIONAL WATER QUALITY CONTROL BOARD

Dear Philip G. Wyels,

Through this office, Ecological Rights Foundation requests that the petition noted above be held in abeyance. The petition does not challenge the assessment of civil penalties per se. The petition challenges a Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order for the Sewer Authority Mid-Coastside, Order No. R2-2018-1012, which fails to comport with the State Board's Water Quality Enforcement Policy.

Sincerely,



Brian Gaffney

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