

March 15, 2006

via email and regular mail

Ms. Lila Tang
NPDES Permits Division
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

LAVWMA Tentative Order for Intermittent Wet Weather Discharge NPDES Permit No. CA0038679

Dear Ms. Tang:

The East Bay Dischargers Authority and its member agencies have reviewed the Tentative Order (T.O.) for the LAVWMA wet weather permit and concur with the comments submitted by LAVWMA, DSRSD, and Livermore. The T.O. has significant problems and needs major revisions before it would not be opposed by the LAVWMA and Authority agencies.

Since this permit is linked to the permits for the Authority, DSRSD, and Livermore, we encourage you to consider withdrawing the T.O. from the April Regional Water Board agenda and reschedule it for consideration at the same time as the other three permits.

The Authority acknowledges the pressure from EPA to resolve the permit backlog. However, it is in the best interests of the POTW community and the Regional Water Board that quality permits be developed that can be supported and adopted by your Board with a minimum of controversy. The Authority and its member agencies are committed to working with you and your staff to develop fair and reasonable permits in a timely manner.

Thank you for your consideration of these comments. Should you have any questions, feel free to contact me.

Sincerely,



Charles V. Weir
General Manager

C: Commissioners
Authority Member Agency Managers
LAVWMA Member Agency Managers

C:\My Documents\Word Docs\Regulatory Issues\NPDES Permit 2005\Comments on LAVWMA TO 03-15-06.doc