



March 22, 2024

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San Francisco Bay Water Quality Improvement Fund
US EPA Region 9 (WTR-3-2)
75 Hawthorne
San Francisco, CA 94105

Via Email: valiela.luisa@epa.gov

Re: BACWA Comments on EPA Region 9 San Francisco Bay Program Office FY24 Annual Priority List

Luisa Valiela,

Thank you for the opportunity to comment on the EPA Region 9 San Francisco Bay Program Office FY24 Annual Priority List. BACWA is a joint powers agency whose members own and operate publicly-owned treatment works and sanitary sewer systems that collectively provide sanitary services to over 7.1 million people in the nine-county San Francisco Bay Area. BACWA members are public agencies, governed by elected officials and managed by professionals who protect the environment and public health. BACWA and its members are involved in many of the program areas and priority projects that are identified by EPA in its FY24 Annual Priority list. We generally agree that EPA has identified the right priorities, with one proposed addition of Recycled Water, and the recommendation to bifurcate “Nutrient Management Strategy” into “Nutrient Science Program” and “Nutrient Management”. Our interest is to continue and expand the important work in our region that has been funded by the Water Quality Improvement Fund (WQIF) in the past.

Recycled Water should be added as a priority area

Increasing the production and use of recycled water in our region is a key priority, as reflected in Action 18 of the CCMP. This goal is also directly tied to the new Program Office’s objective of adapting to climate change, as recycled water will support the region’s resilience to more frequent and intense droughts that are anticipated in a warming climate. Funding from the new program office should be instrumental in supporting planning efforts that would assist new recycled water projects to get off the ground. This item does not appear to be captured by any of the existing identified program areas, so BACWA recommends that recycled water be added as an additional priority area.

“Nutrient Management Strategy” should be split into two program areas: 1) “Nutrient Science Program”, and 2) Nutrient Management

Since 2012 BACWA and its members have contributed more than \$16 million to studying the impacts of nutrients on the San Francisco Bay. This total does not include contributions made to this study by the Regional Monitoring Program, which is also largely funded by BACWA members.

The Nutrient Science Program is supported by the governance supplied by the Nutrient Management Strategy, and is the basis for making decisions that will impact billions of dollars of infrastructure spending in our region. The entity that can use these funds to support these decisions is more correctly identified as the Nutrient Science Program, rather than the Nutrient Management Strategy.

Secondly, POTWs in our region are gearing up to spend approximately \$11 billion to reduce nutrient discharges to the Bay. While funding for the new program office isn't going to significantly defray this total cost, in the past, WQIF funds have been instrumental in launching many innovative projects at POTWs that have led to improvements in water quality, and to multi-benefits projects. These have included sidestream treatment pilots, other innovative nitrogen removal pilots, and most of the pilots of nature-based wastewater treatment and shoreline resilience that are ongoing at POTWs in our region. The nature-based nutrient reduction projects may be partially encapsulated under the existing "Large scale shoreline resilience, multi-benefit projects including horizontal levees and wastewater treatment/reuse" program area, but this title doesn't quite capture the range of needs pertaining to nutrient treatment. Given the anticipated requirements to reduce nutrients significantly in a short timeframe, this type of funding is more important than ever, and should be continued and enhanced as part of a Nutrient Management program area.

BACWA looks forward to working closely with the new EPA SF Bay Program office to identify projects that support improved water quality and other environmental and community benefits in our region. If you have any questions or would like to discuss our comments, please contact BACWA Executive Director Lorien Fono at lfono@bacwa.org or (510) 684-2993.

Best regards,

A handwritten signature in black ink that reads "Lorien Fono". The signature is fluid and cursive, with a long horizontal stroke at the end.

Lorien Fono, Ph.D., P.E.
Executive Director
Bay Area Clean Water Agencies

cc: BACWA Executive Board