

BACWA Compliance Milestone #2 Request for Information

BACWA is circulating this Request for Information (RFI) to support regional compliance with the Nutrients Watershed Permit. **Please respond by February 13, 2026.** If you need assistance, please attend HDR's office hours: [Link to office hours schedule](#).

There are three main sections of this RFI. The first is required and will satisfy the compliance schedule milestone reporting requirements of the 2024 Nutrients Watershed Permit (R2-2024-0013; see Table 5). Agencies are required to update their information annually so that BACWA can compile and submit the information with the Group Annual Report due April 1, 2026.

The second section supports a proposed Basin Plan Amendment to allow compliance schedules longer than 10 years. Your participation is not required, but would be greatly appreciated.

The third part supports the Regional Planning Study required by Order R2-2024-0013, including development of a nutrient trading framework for the region.

Please make sure that you would be comfortable providing to the Water Board all the information submitted through this RFI.

Administrative

Please provide the names of those completing this form.

If multiple, separate with semicolon.

Please provide the email addresses of those completing this form.

If multiple, separate with semicolon.

Please select the Discharger.

- | | | |
|--------------------------------------------------------------------|--------------------------------------------------------------|-------------------------------------------------------|
| <input type="radio"/> American Canyon, City of | <input type="radio"/> Benicia, City of | <input type="radio"/> Burlingame, City of |
| <input type="radio"/> Central Contra Costa Sanitary District | <input type="radio"/> Central Marin Sanitation Agency | |
| <input type="radio"/> Crockett Community Services District | <input type="radio"/> Delta Diablo | |
| <input type="radio"/> Dublin San Ramon SD | <input type="radio"/> East Bay Municipal Utility District | <input type="radio"/> Fairfield-Suisun Sewer District |
| <input type="radio"/> Hayward, City of | <input type="radio"/> Livermore, City of | <input type="radio"/> Millbrae, City of |
| <input type="radio"/> Mt. View Sanitary District | <input type="radio"/> Novato Sanitary District | <input type="radio"/> Oro Loma SD |
| <input type="radio"/> Palo Alto, City of | <input type="radio"/> Pinole, City of | <input type="radio"/> Richmond, City of |
| <input type="radio"/> Rodeo Sanitary District | <input type="radio"/> San Jose and Santa Clara, Cities of | <input type="radio"/> San Leandro, City of |
| <input type="radio"/> San Mateo, City of | <input type="radio"/> Sausalito-Marin City Sanitary District | |
| <input type="radio"/> SD No. 5 of Marin County (Paradise Cove) | <input type="radio"/> SD No. 5 of Marin County (Tiburon) | |
| <input type="radio"/> Sewerage Agency of Southern Marin | <input type="radio"/> SFO Airport | |
| <input type="radio"/> SFPUC Southeast | <input type="radio"/> SFPUC Treasure Island | <input type="radio"/> Silicon Valley Clean Water |
| <input type="radio"/> South San Francisco and San Bruno, Cities of | <input type="radio"/> Sunnyvale, City of | |
| <input type="radio"/> Union SD | <input type="radio"/> Vallejo Flood and Wastewater District | |
| <input type="radio"/> West County Wastewater District | | |

1. Compliance Schedule Milestone Reporting (Required)

Is this discharger considered an early actor?

In determining your response, please follow the guidance provided by the Regional Water Board in their 2025 Letter (available here: [Link](#))

- ☐ Yes
- ☐ No
- ☐ Unsure

Please provide your expected next steps if you have implemented early actions but you are unsure you qualify.

As per May 30, 2025 letter from Board

Please provide a status update on project implementation

As per May 30, 2025 letter from Board

Please provide the date construction or implementation began for each project.

As per May 30, 2025 letter from Board

Please provide the expected completion date or date projects were completed (expected year is acceptable) for each project.

As per May 30, 2025 letter from Board

For each project. list the TIN discharge concentration (mg N/L) expected upon completion. For recycled water projects, please provide the expected TIN load reduction (kg N/d)

As per May 30, 2025 letter from Board

Please select all categories that apply to the projects:

As per May 30, 2025 letter from Board

- ☐ Optimization
- ☐ Traditional Treatment Infrastructure
- ☐ Nature-Based Solutions
- ☐ Recycled Water

Would you like to provide information for additional projects that you are considering to also achieve compliance?

- ☐ Yes
- ☐ No

Do you plan to meet the final effluent TIN limits solely or in part through treatment optimization?

- ☐ Yes
- ☐ No

Please describe the optimization work planned for your facility.

Please provide your schedule for completion of the work (Table 5 in R2-2024-0013 requires completion by May 1, 2028).

Prior to this milestone, had you already identified a compliance pathway? Link to 2024 Group Annual Report: [link](#)

- ☐ Yes
- ☐ No

Please select all categories that apply to the projects:

- ☐ Optimization
- ☐ Traditional Treatment Infrastructure
- ☐ Nature-Based Solutions
- ☐ Recycled Water
- ☐ Nutrient Credit Trading

Please provide a status update on implementation of the identified compliance pathway

Please describe which alternative or combination of alternatives best achieves compliance with the final effluent TIN limit.

Please select all categories that apply to the projects:

- ☐ Optimization
- ☐ Traditional Treatment Infrastructure
- ☐ Nature-Based Solutions
- ☐ Recycled Water
- ☐ Nutrient Credit Trading

Does your compliance pathway include innovative technology?

- ☐ Yes
- ☐ No
- ☐ Maybe/Unsure

Will you perform a pilot study for the proposed innovative technology?

- ☐ Yes
- ☐ No

Please provide a timeline for each expected pilot study

What information can you provide regarding your consideration of innovative technology?

Please provide a summary of your progress toward meeting the final effluent TIN limits.

Free form, flexible response to allow the discharger to share information not provided previously. The goal is to provide any additional narrative information with key details

2. Basin Plan Amendment Support (Optional; Not Included in Group Annual Report)

Does your compliance pathway require more than the 10 years given by Order R2-2024-0013?

- ☐ Yes
- ☐ No

Please select the categories that apply to your projects that may qualify for an extended compliance deadline under the proposed amendment. 1) NbS 2) Water Recycling 3) Innovative Technology 4) Significantly below current final limits (e.g., ~15 mg/L)

- ☐ Nature-Based Solution
- ☐ Water Recycling
- ☐ Innovative Technology
- ☐ Significantly below current final limits (e.g., ~15 mg/L)

What are you hoping to achieve through the proposed innovative technology (i.e., what is your motivation)?

Are you seeking grant funding?

- ☐ Yes
- ☐ No

Please describe the type of grant funding you are seeking and when you plan on applying.

Please describe the financing alternatives you are considering.

3. Regional Planning Study Information (Required)

Does your compliance pathway include any multi-benefit solutions?

- ☐ Yes
- ☐ No

Please describe.

Are you interested in participating in workshops related to innovative technology and multi-benefit solutions?

- ☐ Yes
- ☐ No

Do you have a firm understanding of nutrient credit trading and its role in meeting the final effluent limits?

- ☐ Yes
- ☐ No

In responding to the following questions on nutrient credit trading, please consider that without demonstrated interest from the dischargers, a trading program is unlikely to succeed. Please respond in a way that reflects how you would like to see the program develop.

Are you interested in participating in a group workshop related to nutrient credit trading to better understand the opportunity and potential?

- ☐ Yes
- ☐ No

Are you interested in an individual meeting to discuss the opportunity and potential of nutrient credit trading for your organization?

- ☐ Yes
- ☐ No

Are you considering participating in nutrient credit trading as a seller/buyer?

- ☐ Yes, Buyer
- ☐ Yes, Seller
- ☐ Unsure
- ☐ No

We would appreciate more information regarding your uncertainty.

Do you have a rough estimate the TIN reduction (kg/year) you would like to purchase each year?

Do you have an estimate of the timing of your interest in purchasing credits (i.e., when and for what duration)?

Do you have a rough estimate the TIN reduction (kg/year) you would like to sell each year?

Do you have an estimate of the timing of your interest in selling credits (i.e., when and for what duration)?

Even if you are not currently planning on buying or selling, are you still interested in the nutrient trading as a potential future compliance option? (Yes, No, Unsure)

- ☐ Yes
- ☐ No
- ☐ Unsure

We would appreciate more information about why you are not interested in participating or are unsure.

(Optional) For the Regional Planning Study, BACWA plans to hold a workshop in Q1 2026 to discuss project financing and estimated ratepayer impacts (See [Scoping Plan](#), Task 8). Is there a finance representative from your agency that BACWA should invite? If so, enter their email address(es) below.
