



CENTRAL CONTRA COSTA SANITARY DISTRICT

5019 IMHOFF PLACE, MARTINEZ, CA 94553-4392

February 24, 2026

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United States Environmental Protection Agency (USEPA)  
Region 9 (WTR-2-2)  
Attn: Luisa Valiela  
Fiscal Year 2025 San Francisco Bay Geographic Program Office  
Proposal Review Committee  
75 Hawthorne Street  
San Francisco, CA 94105

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KATIE YOUNG  
Secretary of the District, CMC

SUBJECT: SUPPORT FROM CENTRAL CONTRA COSTA SANITARY DISTRICT  
(CENTRAL SAN) FOR THE BAY AREA CLEAN WATER AGENCIES' (BACWA)  
CLEAN WATER TOGETHER PROPOSAL

Dear San Francisco Bay Geographic Program Office Proposal Reviewer:

On behalf of Central San, I am writing to express our strong support of the proposal titled "Clean Water Together – A Coalition Proposal for Regional Nutrient Solutions" submitted by BACWA, with partners at the San Francisco Estuary Partnership, East Bay Municipal Utility District, East Bay Dischargers Authority, Dublin San Ramon Services District, the City of South San Francisco, Mt. View Sanitary District, Sanitation Agency of Southern Marin, and City of Burlingame, in response to the USEPA's Notice of Funding Opportunity Number: EPA-R9-SFBay-26-0. As a region, we are at a critical juncture in protecting the San Francisco Bay, and this collaborative effort represents a viable and timely path toward sustainable nutrient management.

Through on-the-ground implementation, targeted research, regional collaboration, and the development of a nutrient trading program, this work will enable publicly owned treatment works (POTWs) to leverage site-specific opportunities while contributing to broader, system-wide nutrient and contaminant management strategies. We believe this collaboration will generate valuable, transferable insights beyond the immediate project areas and inform practical, scalable approaches to wastewater nutrient management across the Bay Area and nationally. We respectfully request your support for this critical initiative.

Central San is a special district of the State of California that provides wastewater collection, treatment, and disposal services; recycled water production and distribution; and household hazardous waste collection. Central San serves nearly 500,000 residents and more than 15,000 businesses. As a partner and subrecipient to BACWA's application to the EPA's Notice of Funding Opportunity Number: EPA-R9-SFBay-26-0, Central San will develop a demonstration-scale Membrane Aerated Biofilm Reactor (MABR) facility, following a successful pilot phase. MABR technology has the potential to provide significant nutrient removal capacity within a treatment plant's existing tankage, helping save hundreds of millions compared to conventional treatment methods. The project will include the design and

Ms. Luisa Valiela  
USEPA Fiscal Year 2025 San Francisco Bay Geographic Program Office  
Proposal Review Committee  
February 24, 2026  
Page 2

evaluation of densified activated sludge (DAS) as a complementary strategy to MABR to optimize nitrogen removal performance, reduce lifecycle costs, and increase the facility's capacity for nutrient reduction using existing tankage. Knowledge from the project will be valuable to both Central San and our partners across the Bay Area as we collectively pursue cost-effective nutrient treatment methods to protect the health of our ecosystem.

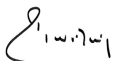
We are particularly supportive of the diverse approaches outlined in the BACWA proposal, which include:

- Process Intensification: Piloting advanced technologies MABR and DAS to reduce nutrients within existing plant footprints, achieving nutrient reductions more efficiently and more quickly than would otherwise be possible without this funding;
- Nature-Based Solutions (NBS): Advancing projects like the "First Mile" Horizontal Levee and floating wetland islands to provide nutrient polishing alongside habitat enhancement and flood resilience; and
- Market-Based Solutions: Developing a regional nutrient trading program that leverages site-specific opportunities to achieve aggregate load reductions more efficiently.

Central San recognizes BACWA's long-standing history of successful regional coordination and fiscal responsibility. Their collaboration with the San Francisco Estuary Partnership ensures robust administrative oversight and effective technology transfer across the region. We are confident that this coalition will deliver high-impact results that serve as a national model for watershed-scale nutrient management.

Central San fully supports this collaborative effort to protect our estuary while practicing economic efficiency with the co-benefits of drought and flooding resilience. We urge the USEPA to fund this proposal and support the regional collaboration necessary for a sustainable San Francisco Bay. If you have any questions, please contact me at [rbailey@centralsan.org](mailto:rbailey@centralsan.org) or 925-229-7386.

Sincerely,



Roger S. Bailey  
General Manager  
Central Contra Costa Sanitary District