



CENTRAL CONTRA COSTA SANITARY DISTRICT

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February 24, 2026

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United States Environmental Protection Agency (USEPA)
Region 9 (WTR-2-2)
Attn: Luisa Valiela
Fiscal Year 2026 San Francisco Bay Geographic Program Office
Proposal Review Committee
75 Hawthorne Street
San Francisco, CA 94105

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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-SF Bay-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 sub-awardee under the BACWA Clean Water Together Proposal, Central San shares the regional objective of reducing nutrient loads to San Francisco Bay. Central San supports the Dublin San Ramon Services District's pilot project to implement Membrane Aerated Biofilm Reactor (MABR) technology in conjunction with its recycled water program to meet final Total

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

Inorganic Nitrogen (TIN) targets by reducing nutrient discharge. The project will quantify nutrient reductions, benchmark energy use, assess improvements to recycled water treatment and quality, and validate a siting strategy. The knowledge gained from this project will be valuable to Central San as we collectively reduce nutrient output to the San Francisco Bay and local watersheds.

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

- Process Intensification: Piloting advanced technologies like MABR and Densified Activated Sludge (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 gnorby@centralsan.org or 925-228-9500.

Sincerely,



Greg Norby
Deputy General Manager, Engineering and Operations
Central Contra Costa Sanitary District