



February 23, 2026

US EPA Region 9 (WTR-2-2)

Attn: Luisa Valiela

75 Hawthorne Street

San Francisco, CA 94105

Attn: FY 2026 San Francisco Bay Geographic Program Office Proposal Review Committee

Subject: Support from City of Hayward for BACWA's Clean Water Together Proposal

Dear San Francisco Bay Geographic Program Office Proposal Reviewer,

On behalf of the City of Hayward, 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, Central Contra Costa Sanitation 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 the City of Burlingame, in response to the EPA'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 important initiative.

The City of Hayward is a member agency of the East Bay Dischargers Authority, of which Dublin San Ramon Services District is also a partner agency. Hayward and DSRSD share the same discharge outfall to the San Francisco Bay and the responsibility of protecting water quality in the Bay. Meeting the low nutrient limits mandated in the Regional Water Quality Control Board's Order R2-2024-0013 requires collaboration among the agencies and participating partners to achieve a combined 40% total inorganic nitrogen (TIN) reduction from 2022 TIN loads. Hayward is currently embarking on a significant project to meet the current permit requirements but is designing the project with future permits in mind, which may reduce nutrient limits even further. Hayward supports Dublin San Ramon Services District's (DSRSD's) MABR pilot project as an innovative, and cost-effective solution. MABR



technology offers a proven method for simultaneous nitrification and denitrification with lower energy use and operational costs compared to conventional systems. By piloting this technology, DSRSD will demonstrate a scalable solution that complements its recycled water operations, minimizes financial impacts on ratepayers and helps Hayward and sister agencies to stay below the San Francisco Regional Water Quality Board's 2034 TIN limit.

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

- **Process Intensification:** Piloting advanced technologies like Membrane Aerated Bioreactors (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. Though Hayward's current project does not include MABR or DAS, it is being designed to potentially accommodate either or both of these technologies in the future. Hayward sees MABR and DAS as potential ways to further reduce nutrients if required, and is interested in learning more about how these technologies work and how effective they are for our local partners.
- **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. Hayward is currently in the preliminary design stage of an NBS project at our wastewater treatment plant that potentially includes both a horizontal levee and constructed treatment wetlands. Further research on and a greater understanding of these emerging technologies will enhance the effectiveness of our NBS project.
- **Market-Based Solutions:** Developing a regional nutrient trading program that leverages site-specific opportunities to achieve aggregate load reductions more efficiently. Hayward expects to meet and at first potentially exceed the requirements of Order R2-2024-0013 in advance of the compliance date. However, it is not clear that all bay area wastewater agencies will be able to do so. Market based solutions such as regional trading programs, if done correctly, are of interest to Hayward as a potential way to provide revenue, assist other agencies in ensuring regional compliance, and incentivize our plant to maximize nutrient removal.

Hayward recognizes BACWA's long-standing history of successful regional coordination and fiscal responsibility. Their collaboration with the San Francisco Estuary Partnership (SFEP) 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.

Hayward 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 EPA 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 alex.ameri@hayward-ca.gov or (510) 583-4720.

Sincerely,



Alex Ameri
Director of Public Works
City of Hayward