



February 24, 2026

US EPA Region 9 (WTR-2-2)
Attn: Luisa Valiela
75 Hawthorne Street
San Francisco, CA 94105

Attn: San Francisco Bay Geographic Program Office Proposal Review Committee

Subject: Support from the City of Livermore for BACWA's Clean Water Together proposal

Dear San Francisco Bay Geographic Program Office Proposal Reviewer,

On behalf of the City of Livermore, 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, City of Burlingame, in response to the EPA'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 important initiative.

The City of Livermore provides wastewater, recycled water, and stormwater services to approximately 90,000 customers in eastern Alameda County. The City of Livermore recognizes that nutrient reduction is essential for improving the health of the San Francisco Bay and preventing harmful algal blooms that threaten ecosystems and public health. The City of Livermore supports Dublin San Ramon Services District's (DSRSD) approach to piloting proven MABR technology and optimizing operational efficiencies to achieve significant nutrient reductions within the facilities existing footprint at a fraction of

the cost of traditional methods while still providing recycled water that meets the needs of the community. This commitment to fiscal responsibility ensures that ratepayers benefit from environmental improvements without undue financial burden.

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.
- **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.
- **Market-Based Solutions:** Developing a regional nutrient trading program that leverages site-specific opportunities to achieve aggregate load reductions more efficiently

The City of Livermore 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.

The City of Livermore 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 awsmith@livermoreca.gov.

Sincerely,



Anthony Smith
Water Resources Division Manager
Public Works Department
City of Livermore