



City of Millbrae

621 Magnolia Avenue, Millbrae, CA 94030

REUBEN D. HOLOBER
Mayor

STEPHEN RAINALDI
Vice Mayor

SISSY RILEY
Councilmember

BOB NGUYEN
Councilmember

ANDERS FUNG
Councilmember

February 24, 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 Millbrae for BACWA's Clean Water Together proposal

Dear San Francisco Bay Geographic Program Office Proposal Reviewer,

On behalf of the City of Millbrae, 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 (SFEP), 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. The proposal was prepared in response to the EPA's Notice of Funding Opportunity Number: EPA-R9-SFBay-26-01.

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 Millbrae owns and operates a POTW which discharges to the San Francisco Bay via a joint outfall with San Bruno Water Quality Control Plant (WQCP). Therefore, the City of Millbrae has a close relationship with nutrient reductions that may be achieved at the WQCP. Knowledge gained from full-scale demonstration of

City Council/City Manager/City Clerk
(650) 259-2334

Building Division/Permits
(650) 259-2330

Community Development
(650) 259-2341

Finance
(650) 259-2350

Fire
(650) 558-7600

Police
(650) 259-2300

Public Works/Engineering
(650) 259-2339

Recreation
(650) 259-2360

DAS at the WQCP will support cost-effective nutrient removal strategies that protect public health and the environment, while minimizing infrastructure and helping to maintain affordable sewer rates for our community. 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 Millbrae 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 Millbrae 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 twilliams@ci.millbrae.ca.us .

Sincerely,



Fai Ali, Director of Public Works and Engineering
City of Millbrae
650-259-2336

Cc: Thomas C. Williams, City Manager
