



CITY OF  
**PALO  
ALTO**

**PUBLIC WORKS**

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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 the City of Palo Alto for BACWA's Clean Water Together proposal**

Dear San Francisco Bay Geographic Program Office Proposal Reviewer,

On behalf of the City of Palo Alto's Regional Water Quality Control Plant (RWQCP), 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-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.

The City of Palo Alto owns and operates the Palo Alto Regional Water Quality Control Plant (RWQCP), an advanced wastewater treatment facility serving residents and businesses within the city and portions of the surrounding community. The RWQCP provides advanced secondary treatment and discharges treated effluent to the South San Francisco Bay under its National Pollutant Discharge Elimination System (NPDES) permit issued pursuant to the Clean Water Act.

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As a South Bay discharger, Palo Alto plays an important role in regional nutrient management efforts aimed at protecting water quality and ecological health in the Estuary. Project deliverables will provide valuable technical, regulatory, and implementation insights into process intensification, nature-based solutions, and market-based strategies that can inform future upgrades at the RWQCP, support compliance with evolving nutrient requirements, and enhance the City's ability to manage nutrients and contaminants of emerging concern in a cost-effective and environmentally responsible manner.

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 such as the "First Mile" Horizontal Levee and floating wetland islands to provide nutrient polishing, support reduction of CECs from RO Concentrate (ROC) and other similar waste streams prior to discharge to the San Francisco Bay, and deliver co-benefits including habitat enhancement, shoreline resilience, and flood protection.
- **Market-Based Solutions:** Developing a regional nutrient trading program that leverages site-specific opportunities to achieve aggregate load reductions more efficiently

The City of Palo Alto's RWQCP 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 Palo Alto's RWQCP 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.

Sincerely,

Signed by:  


Aaron Gilbert, Plant Manager  
City of Palo Alto Regional Water Quality Control Plant  
[Aaron.Gilbert@PaloAlto.gov](mailto:Aaron.Gilbert@PaloAlto.gov)