



February 25, 2026

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

Subject: Support from City of San José for BACWA's Clean Water Together proposal

Dear San Francisco Bay Geographic Program Office Proposal Reviewer,

On behalf of the City of San José, 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, 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, Valley Water, City of San José, and UC Berkeley, 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 San José administers, maintains, and operates the San José-Santa Clara Regional Wastewater Facility (RWF), which it co-owns with the City of Santa Clara. The RWF is the largest POTW in the region, treating wastewater from 1.5 million residential customers and over 17,000 commercial and industrial business spread across most of Santa Clara County. The RWF is an environmental leader in protecting the San Francisco Bay while providing excellent and reliable wastewater treatment services that already remove up to 80% of incoming nitrogen through an advanced secondary treatment system and substantial recycled water diversions.

The knowledge gained from this project will be valuable to our organization and the region. We are particularly supportive of the diverse approaches outlined in the proposal, which include:

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- 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

As a subrecipient on this award, the City of San José will be working closely with SFEP, Valley Water, and UC Berkeley to conduct a comprehensive feasibility study on the potential use of an NBS (a horizontal levee) in the lower south bay to treat reverse osmosis concentrate (ROC) and other high nitrogen waste streams. The City of San Jose is excited to collaborate on this important work in the manner specified in the proposal. In particular, with our project partners, we will:

- Evaluate the effectiveness of a horizontal levee to reduce TIN in ROC from high-efficiency reverse osmosis systems.
- Evaluate the cost and feasibility of implementing an NBS in the lower south bay, including development a regulatory pathway.
- Begin development of models and machine learning tools to predict horizontal levee performance, which will help inform decisions on design and operations.
- Draft a Memorandum of Understanding to define ownership and operational and maintenance responsibilities of a horizontal levee.

As a principal member of BACWA, the City of San José 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.

City of San José 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 eric.dunlavey@sanjoseca.gov or (408) 635-4017.

Sincerely,



Eric Dunlavey, Deputy Director Regulatory Affairs and Purified Water
City of San José, Environmental Services Department