

February 24, 2026

Luisa Valiela
US EPA Region 9 (WTR-2-2)
75 Hawthorne Street
San Francisco, CA 94105
Attn: SF Bay Geographic Program Office Proposal Review Committee

Subject: Support from East Bay Municipal Utility District for Bay Area Clean Water Agencies (BACWA) Clean Water Together proposal

Dear Proposal Reviewer,

On behalf of the East Bay Municipal Utility District (District), 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, and City of Burlingame, in response to the U.S. Environmental Protection Agency’s (US EPA) 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 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.

We are 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 be possible without this funding.

- Nature-Based Solutions: 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

In particular, the District will gain valuable knowledge from process intensification pilot testing of MABR and densification (i.e., hydrocyclone-based wasting or DAS). These technologies are relatively new in the wastewater industry; however, they provide opportunities for agencies to reduce capital and operating costs while still achieving nutrient reduction requirements.

BACWA's proposal will help these technologies mature, which is a benefit to agencies and their ratepayers across the Bay Area and the rest of the United States. The District plans to collaborate with proposal partners in the technology transfer task for process intensification and market-based solutions. The District's centrally located facilities will support BACWA's coalition by providing meeting space for workshops and other collaborative activities. This collaboration does not include any formalized match or in-kind contributions.

The District recognizes BACWA's long-standing history of successful regional coordination and fiscal responsibility. Its collaboration with the San Francisco Estuary Partnership 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 District 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 US 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 amit.mutsuddy@ebmud.com.

Sincerely,

A handwritten signature in black ink that reads "Amit Mutsuddy". The signature is fluid and cursive, with a long horizontal stroke at the end.

Amit Mutsuddy, P.E.

AM:JS:ma