



Livermore-Amador Valley Water Management Agency

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 Livermore Amador Valley Water Management Agency (LAVWMA) for BACWA's Clean Water Together proposal

Dear San Francisco Bay Geographic Program Office Proposal Reviewer,

On behalf of LAVWMA, 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. We respectfully request your support for this important initiative.

The Livermore-Amador Valley Water Management Agency (LAVWMA) is a joint powers agency created in 1974 by the cities of Livermore and Pleasanton and the Dublin San Ramon Services District for the purpose of discharging their treated wastewater to San Francisco Bay. Operations began in September 1979 with expansions in 1983, 1987 and 2003 bringing it to its current maximum discharge capacity of 41.2 mgd. The wastewater is conveyed via a 16-mile pipeline

from Pleasanton to San Leandro and enters the East Bay Dischargers Authority (EBDA) system for dechlorination and discharge through a deepwater outfall to the San Francisco Bay.

LAVWMA's facilities span from the City of Livermore to the San Francisco Bay. LAVWMA receives treated wastewater from plants operated by the City of Livermore and the Dublin San Ramon Services District (DSRSD). The combined average dry weather flowrate from these two facilities is limited by the joint powers agreement to a maximum flowrate of 31.8 million gallons per day (mgd). LAVWMA facilities are designed to export a maximum flow of 41.2 mgd during wet weather events. The treated effluent from the two treatment plants flows by gravity to the LAVWMA Export Pump Station in Pleasanton.

LAVWMA supports this effort because it has the potential to reduce nutrients conveyed through LAVWMA infrastructure to San Francisco Bay.

DSRSD is a member agency of LAVWMA and shares the responsibility of protecting water quality in the Bay. Meeting these very low nutrient limits requires collaboration among the agencies and participating partners to achieve a combined 40% total inorganic nitrogen (TIN) reduction from 2022 TIN loads. LAVWMA supports Dublin San Ramon Services District (DSRSD) MABR pilot project as an innovative, and cost-effective solutions. MABR technology offers a proven method for simultaneous nitrification and denitrification with lower energy use and operational costs compared to conventional systems. By piloting this technology, DSRSD will demonstrate a scalable solution that complements its recycled water operations, minimizes financial impacts on ratepayers and helps Bay Area agencies to stay below the San Francisco Regional Water Quality Board's 2034 TIN limit.

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

LAVWMA 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.

LAVWMA 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 a fuller@lavwma.com.

Sincerely,

Levi Fuller

Levi Fuller, General Manager
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