

February 24, 2026

U.S. Environmental Protection Agency, Region 9
San Francisco Bay Program
75 Hawthorne St.
San Francisco, CA, 94105
Attn: Luisa Valiela

Subject: Support from the San Francisco Bay Nutrient Management Strategy for BACWA's Clean Water Together Proposal

Dear Environmental Protection Agency Grant Proposal Review Committee,

On behalf of the San Francisco Bay Nutrient Management Strategy (NMS), I am writing to express our support for the proposal titled "Clean Water Together – A Coalition Proposal for Regional Nutrient Solutions," submitted by the Bay Area Clean Water Agencies (BACWA) and its partners, in response to EPA Notice of Funding Opportunity Number EPA-R9-SFBay-26-0.

The NMS is a regional program of the San Francisco Bay Regional Water Quality Control Board established to address nutrient enrichment in San Francisco Bay, with a particular focus on understanding and managing the conditions that contribute to harmful algal blooms and impacts to sensitive species, including white and green sturgeon. A central challenge for the NMS is developing actionable, cost-effective nutrient management strategies that can achieve meaningful load reductions at regional scale – and the Clean Water Together proposal speaks directly to that challenge.

We support this proposal for several reasons. The coalition's multi-pronged approach – spanning process intensification at existing facilities, nature-based nutrient polishing, and the development of a regional nutrient trading framework – reflects exactly the kind of integrated approach needed to achieve durable water quality improvements in the Bay.

The NMS is interested in the nutrient trading component of this proposal. A well-designed regional trading program has the potential to unlock site-specific efficiencies across Bay Area POTWs while still meeting Bay-wide load reduction goals. Similarly, the process intensification pilots – including Membrane Aerated Bioreactors and Densified Activated Sludge technologies – will generate performance and cost information that can inform load reduction target-setting and compliance pathway analysis at the regional level.

The NMS supports this proposal and recommends that EPA fund this important initiative.

Sincerely,

A handwritten signature in cursive script that reads "Kevin Lunde".

Kevin Lunde, Ph.D.
Chair, Nutrient Management Strategy Steering Committee