



---

## San Francisco Bay Regional Water Quality Control Board

February 23, 2026

U.S. Environmental Protection Agency, Region 9 (WTR-2-2)  
San Francisco Bay Geographic Program  
75 Hawthorne Street  
San Francisco, CA 94105  
Attn: Luisa Valiela

**Subject: Support from the San Francisco Bay Regional Water Quality Control Board for BACWA's Clean Water Together proposal**

Dear San Francisco Bay Geographic Program Office Proposal Reviewer,

On behalf of the San Francisco Bay Regional Water Quality Control Board (Water Board), 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 and effective 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 Water Board is a regulatory agency responsible for the protection of water quality throughout the San Francisco Bay Area. In 2024, our agency took the monumental step of requiring a 40 percent region-wide load reduction from 40 municipal wastewater

---

DONALD YOUNG, CHAIR | EILEEN M. WHITE, EXECUTIVE OFFICER

treatment plants. This action was necessary because nutrient loads from wastewater fueled a widespread harmful algae bloom in 2022, which resulted in fish kills of protected species such as white and green sturgeon. The Water Board's NPDES permit requires wastewater treatment plants to achieve the aggregate nitrogen reduction by 2034, a timeline requiring immediate collaboration and coordination across wastewater treatment plants, regulators, and scientists. This grant proposal facilitates regional action to achieve these substantial nutrient reductions, thereby improving water quality and supporting the many beneficial uses of San Francisco Bay.

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: 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

The Water Board 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 Water Board fully supports this collaborative effort to protect San Francisco Bay while practicing economic efficiency with the co-benefits of drought and flooding resilience. We strongly recommend the EPA fund this proposal and support the regional collaboration necessary for a sustainable San Francisco Bay. If you have any questions, please contact me at [Eileen.White@waterboards.ca.gov](mailto:Eileen.White@waterboards.ca.gov) or (510) 622-2314.

Sincerely,



Eileen M. White, P.E.  
Executive Officer