



EBDA
East Bay Dischargers Authority

50 years of protecting the SF Bay

1974 – 2024

February 20, 2026

US EPA Region 9 (WTR-2-2)

Attn: Luisa Valiela

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San Francisco, CA 94105

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Eric Casher

Attn: 2026 San Francisco Bay Geographic Program Office Proposal Review Committee

Subject: Support from East Bay Dischargers Authority for BACWA's Clean Water Together proposal

Dear San Francisco Bay Geographic Program Office Proposal Reviewer,

On behalf of the East Bay Dischargers Authority (EBDA), 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, 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 EPA's Notice of Funding Opportunity Number: EPA-R9-SF Bay-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.

EBDA is a joint powers authority made up of the Cities of San Leandro and Hayward, and the Castro Valley, Oro Loma, and Union Sanitary Districts. Including contract flows from the Livermore-Amador Valley Water Management Agency, EBDA manages the sustainable disposal of wastewater from one million East Bay residents and businesses to San Francisco Bay. EBDA has been a leader in championing multi-benefit shoreline adaptation projects that remove nutrients while providing flood protection and

EAST BAY DISCHARGERS AUTHORITY
A Joint Powers Public Agency

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enhancing habitat resilience, including the Oro Loma Horizontal Levee Pilot and the First Mile Horizontal Levee Project.

Under the proposed grant, EBDA looks forward to continuing our leadership on the First Mile Horizontal Levee Project, working with partners to finalize the design and permitting for this first-of-its-scale project to bring it to “shovel-ready.” This project has benefitted from EPA’s stewardship to date, with the Water Quality Improvement Fund supporting the 30% and 60% design phases. EBDA’s proven track-record as a subawardee on the Transforming Shorelines and Pivot Point grants demonstrates our readiness to complete the design with this funding. As part of the proposed project, EBDA is pledging \$278,000 as an in-kind contribution, representing staff time, to be used as match to EPA’s funds.

Through its innovative design and permitting strategies, the First Mile is paving the way for other multi-benefit nature-based solutions, including the work of Mt. View Sanitary District and Santa Clara Valley Water District proposed here. We envision continued cross-support and coordination in this phase.

EBDA is also very supportive of and would directly benefit from the diverse, innovative nutrient reduction and management approaches outlined in the proposal, including:

- **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. EBDA particularly supports Dublin San Ramon Services District’s efforts to pilot innovative technology, which would reduce total inorganic nitrogen discharged through EBDA’s outfall.
- **Market-Based Solutions:** Developing a regional nutrient trading program that leverages site-specific opportunities to achieve aggregate load reductions more efficiently.

EBDA 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.

EBDA 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 jzipkin@ebda.org.

Sincerely,



Jacqueline Zipkin, P.E.
General Manager