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February 12, 2026

US EPA Region 9 (WTR-2-2)  
75 Hawthorne Street  
San Francisco, CA 94105

Attention: Luisa Valiela

FY 2022 San Francisco Bay Geographic Program Office Proposal Review Committee

**Subject:** Support from Alameda County Flood Control and Water Conservation District for BACWA's Clean Water Together proposal

Dear San Francisco Bay Geographic Program Office Proposal Reviewer,

On behalf of the Alameda County Flood Control and Water Conservation 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 the Bay Area Clean Water Agencies (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, 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.

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.

- Market-Based Solutions: Developing a regional nutrient trading program that leverages site-specific opportunities to achieve aggregate load reductions more efficiently.
- 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.

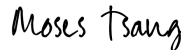
The District is collaborating closely with the East Bay Dischargers Authority and other partners on the First Mile Horizontal Levee Project, and we strongly support this proposal to help bring that multi-benefit project to fruition. We see the First Mile Project as a critical opportunity to enhance shoreline resilience and flood protection in Alameda County, and it is well-aligned with our long-term planning for the area.

The District 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 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 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 (510) 670-6549; e-mail: [moses@acpwa.org](mailto:moses@acpwa.org).

Sincerely,

DocuSigned by:

Moses Tsang

Moses Tsang, P.E.

Deputy Director

Flood Control Program