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November 10, 2026

Delta Independent Science Board
715 P Street, 15-300
Sacramento, CA 95814

Delivered via email: disb@deltacouncil.ca.gov

SUBJECT: Sacramento Area Sewer District Comments on the Delta Independent Science Board Draft Prospectus on Nature-Based Solutions for the Delta

Dear Delta Independent Science Board Members,

The Sacramento Area Sewer District (SacSewer) appreciates the opportunity to review and provide comments on the Delta Independent Science Board's (Delta ISB) Draft Prospectus on "Nature-Based Solutions for the Delta: A Prospectus for an Independent Science Board Review" (Draft Prospectus). As the Sacramento region's sewage collection, treatment, and resource recovery utility, SacSewer provides essential services to more than 1.6 million residents across a 386-square-mile service area. SacSewer owns and operates the EchoWater Resource Recovery Facility (EchoWater Facility), one of the largest and most advanced water resource recovery facilities in the nation, treating an average of 118 million gallons of sewage daily. In 2023, SacSewer completed its $1.7 billion, decade-long upgrade to the EchoWater Facility, an expanded tertiary treatment facility. The EchoWater Facility removes 99% of ammonia and 89% of nitrogen from collected sewage.

SacSewer is a recognized leader in environmental stewardship and sustainable water management and is deeply committed to the health of the Sacramento-San Joaquin Delta (Delta) ecosystem. SacSewer's Scientific Research team provides scientific support for a wide range of research evaluations, studies, and collaborations, with the goal of better understanding the current and future effects of our discharge, as well as other factors affecting the Delta watershed's ecological health. We have the following comments for your consideration as you develop the final Prospectus.

Nature-based solutions (NBS) can offer significant ecological benefits while meeting communities' infrastructure needs and are likely to see increased use in the future. The Draft Prospectus highlights many important projects in the Delta, but we recommend increasing the focus on NBS for flood protection by including projects at the land-water interface.

Please consider adding the following types of levee projects to your review:

<u>Setback Levees</u>

At the north end of the Delta, West Sacramento's Levee Improvement Program (WSLIP) provides an example of how NBS can be incorporated into levee maintenance projects. The

Southport Early Implementation Project restored 212 acres of ecologically functional floodplain habitat along the Sacramento River shoreline, increasing the region's biodiversity, groundwater recharge, carbon sequestration, water quality, and recreational opportunities. Information about the project is listed below.

Levee Projects | City of West Sacramento
Southport Levee Improvement Project | HDR

Horizontal Levees

Horizontal Levees are a relatively new NBS being implemented along many shorelines in San Francisco Bay. Horizontal levees use a shallow vegetated slope to provide flood protection rather than constructing hard structures and irrigate upland vegetation with recycled water. Horizontal levees provide many benefits over traditional levees, including the creation of freshwater marsh habitat with increased biodiversity, upland habitats that provide refuge for native species during high tides, flood protection with the potential to adapt to sea-level rise, and increased polishing of treated wastewater effluent. More information on Horizontal Levees is available at the following websites:
Palo Alto Horizontal Levee Pilot Project – City of Palo Alto, CA
Horizontal Levee Project - Oro Loma Sanitary District

Additional Resources to Consider for NBS Review

The KneeDeep Times also published an article on September 10, 2026, titled "Guide to Nature-Based Infrastructure Around the Bay Area," which provides a nice overview of NBS being implemented throughout the estuary that may inform your review:
Guide to Nature-Based Infrastructure Around the Bay Area – KneeDeep Times

An Inland Wetlands Nature-Based Solutions Summit, hosted by multiple agencies, is scheduled for November 12, 2026, at UC Davis and may provide useful information for your review:
https://tnc.swoogo.com/NBSSummits2026/wetlands?utm_medium=email&utm_source=govdelivery

In conclusion, we appreciate the Delta ISB's decision to review the use of NBS in the Delta. This review should increase regional awareness of the utility and effectiveness of NBS and the multiple benefits they can provide. We welcome any questions you have regarding our comments and look forward to discussing your findings in the future.

Sincerely,



Timothy Mussen, Ph.D.
Senior Scientist
Sacramento Area Sewer District