

San Francisco Bay Regional Water Quality Control Board

Priorities and Performance Measures and Targets





ANNUAL PERFORMANCE REPORT – FY 2024/25

September 2025

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LEGEND: STATUS SYMBOLS

	Completed
	In progress, on-track
	In progress, behind
	Not completed

ORGANIZATIONAL PRIORITIES

CLIMATE ACTION

PRIORITY ACTION	STATUS
Participate in multi-agency and stakeholder groups to develop long-range planning efforts and specific projects to facilitate San Francisco Bay shoreline adaption to projected sea level rise, e.g., wetland restoration	Continued to participate in several multi-agency and stakeholder groups, such as the San Francisco Estuary Partnership, the San Francisco Bay Restoration Authority, the Bay Restoration Regulatory Integration Team and its Policy and Management Committee, the Bay Area Regional Collaborative, and Bay Adapt, to develop long-range planning efforts and support specific projects to facilitate San Francisco Bay shoreline resilience and adaption to projected sea level rise. Also continued to participate in local efforts, such as the Resilient SR-37 Partnership, Oakland Alameda Adaptation Committee, San Francisco Waterfront Resilience Program, and the City of San Rafael's Canal Community Resilience Planning Project.
Use regulatory tools to require wastewater plants, landfills, biosolids land application sites, refineries, and industrial cleanup sites to conduct climate vulnerability assessments and prepare adaptation plans	Continued to use regulatory tools to require wastewater plants, landfills, and other facilities to conduct climate vulnerability assessments and prepare adaptation plans.

PRIORITY ACTION	STATUS
Coordinate with the U.S. Army Corps of Engineers (Corps) and other stakeholders to increase beneficial reuse of dredged sediment to restore Bay tidal wetlands and adapt to a rising Bay	In cooperation with Corps, completed the draft joint Environmental Assessment/Environmental Impact Report (EA/EIR) under the National Environmental Protection Act and California Environmental Quality Act for the San Francisco Bay Federal Channel Maintenance Dredging Program. Received public comments on the EA/EIR and are currently working on responding to the comments and revising the EA/EIR.
Promote, plan, and permit complex and large projects that use nature-based solutions and green infrastructure for shoreline adaptation, wastewater treatment, and stormwater management	Continued to promote, plan, and permit complex and large projects that use nature-based solutions and green infrastructure for shoreline adaptation, wastewater treatment, and stormwater management, such as the collaborative multi-agency partnership to adapt State Route 37 to sea level rise.

RACIAL EQUITY AND ENVIRONMENTAL JUSTICE

PRIORITY ACTION	STATUS
Prioritize assessing the impacts of our water quality programs on affected communities, particularly Black, Indigenous, and People Of Color (BIPOC) communities, with a goal of promoting environmental equity	Continued to prioritize assessing the impacts of water quality programs on affected communities, particularly Black, Indigenous, and People of Color communities.
Engage with communities who have experienced historical racism and environmental injustices and prioritize program activities in these communities	Continued to engage with communities who have experienced historical racism and environmental injustices. Continued to prioritize program activities such as site cleanups in these communities.
Provide technical, planning, and permitting assistance in communities planning and implementing climate adaptation projects, such as wetland restoration, horizontal levees, and other nature-based solutions	Continued to provide technical, planning, and permitting assistance to support climate adaptation projects such as our collaborative engagement with the Oakland Alameda Adaptation Committee and the City of San Rafael's Canal Community Resilience Planning Project.
Ensure industrial facilities and dischargers near these communities are frequently inspected and in compliance	Inspected industrial facilities to ensure compliance near these communities.

PRIORITY ACTION	STATUS
Revise requirements for cleanup cases in areas most vulnerable to flooding and mobilization of contamination from sea level and groundwater rise	Engaged with environmental justice advocates in several disadvantaged communities, listened to their concerns and discussed site cleanup progress. Continued to prioritize and track cleanup program sites located in disadvantaged communities.



WORKFORCE PLANNING AND DEVELOPMENT







PRIORITY ACTION	STATUS
Develop employees to meet evolving workforce needs and provide career and professional development opportunities to expand their skills	Continued to send staff to various training courses and conferences, so they could keep abreast of the latest developments. Facilitated internal trainings and knowledge share based on in house expertise and acquired learnings.
Implement organizational measures that promote and value employee contributions, safety, employee wellness, diversity and inclusion, and a learning culture	Continued to implement organizational measures that promote and value employee contributions, safety, employee wellness, diversity and inclusion, including supporting staff participation in CalEPA employee affinity groups, and providing a hybrid work environment.
Engage employees in continuous improvement initiatives	Continued to engage employees in continuous improvement initiatives by soliciting their feedback and discussing ways to improve processes especially as we adjust to the hybrid work environment.
Support leadership development and practice	Continued to support leadership development and practice by soliciting ideas for leadership development and implementing training, ongoing peer discussions, and shared learning models.
Include racial equity, diversity, and inclusion practices to support our hiring, promotion, and retention goals	Continued to include racial equity, diversity, and inclusion practices to support our hiring, promotion, and retention goals. Continued executive sponsorship for regional racial equity and inclusion trainings as well as the focused recruitment committee and ongoing hiring and retention practices.





PROGRAM PRIORITIES

PLAN & ASSESS






BASIN PLANNING

PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Implement the Climate Change and Wetland Policy Basin Plan amendment	<p>Secure Office of Administrative Law (OAL) Approval</p> <p>Implement outreach strategy to inform regulated community</p>	 	<p>State Board approved the Revised Basin Plan Amendment on December 18, 2024. The OAL will consider it in September 2025.</p> <p>Internal Outreach – Gave a presentation to the Watershed Management Division’s 401 workgroup, NPDES Division, and Groundwater Division’s Landfill Team.</p> <p>External Outreach – On October 31, 2024, we presented at a workshop to familiarize U.S. EPA and U.S. Army Corps of Engineers permit analysts with the technical concepts that underpin the Adaptation Atlas toolbox including the Baylands Resilience Framework and help analysts understand how they can use the toolbox to support shoreline and Bayland adaptation project planning and permitting.</p> <p>In March 2025, we presented to the Bay Area Flood Protection Agency Association and the City of Sunnyvale to promote science-based, cross-jurisdictional, and nature-based shoreline adaptation approaches.</p>






PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Designate Tribal Tradition and Culture and Tribal Subsistence Fishing Beneficial Uses in the Basin Plan	<p>Draft Staff Report and Basin Plan Amendment for designating Tribal Tradition and Culture Beneficial Use</p> <p>Conduct formal AB52 consultation with tribes</p>	<p></p> <p></p>	<p>The departure of lead staff delayed this project. New staff have recently been hired and will continue developing the Basin Plan Amendment.</p> <p>AB52 consultations were delayed due to staff departures.</p>
Develop Climate Change and Riparian Area Protection Policy	<p>Review and document the science pertaining to climate change effects on riparian and creek ecosystems</p> <p>Assess regulatory options for protecting riparian and creek beneficial uses</p> <p>Participate in technical advisory group for EPA-funded Sediment Solutions Project assessing current and future hydrologic and geomorphic conditions in the Petaluma River watershed</p> <p>Manage contract with San Francisco Estuary Institute to assess current and future riparian conditions in the Petaluma River watershed</p>	<p></p> <p></p> <p></p> <p></p>	<p>Initial scientific literature review to support the scientific basis of the staff report has been completed.</p> <p>Planning Division staff has been meeting regularly with internal and external stakeholders to discuss different aspects of regulatory options to protect riparian and creek beneficial uses.</p> <p>SFEI has been developing management actions for climate resilient riparian systems in the Petaluma River watershed and was planning on drafting the synthesis report by the end of 2025. The loss of discretionary funding will delay or prevent the development of a mapping protocol for riparian communities and potential adaptation measures in the watershed.</p> <p>Contract is being managed. Collaboration is ongoing and deliverables are being tracked and submitted. The loss of discretionary funding will eliminate or delay the contract management task.</p>

PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Support tools to understand Subsistence Fishing Beneficial Use	Finish development of subsistence fishing survey		Development of the subsistence fishing survey was completed and pilot tested. 28 surveys were collected. Data will be analyzed to see whether revisions need to be made to the survey.
Triennial Review	Review the Basin Plan Prepare and recommend a prioritized list of amendments to the Basin Plan to address water quality policy needs Solicit input from stakeholders on Proposed list of Basin Plan amendments Bring Triennial Review before the Board for approval	  	The Basin Plan was reviewed, including an assessment of site-specific objectives, and high priority amendments were identified for future action. Received public input on proposed Basin Plan amendments and responded to all comments. Triennial Review and the Prioritized List of Basin Planning Projects were adopted on May 14, 2025.


INTEGRATED REPORT AND TOTAL MAXIMUM DAILY LOADS (TMDLs)




PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Develop high priority TMDLs	<p>Complete monitoring for the San Mateo Bay Beaches TMDL</p> <p>Develop and begin implementing monitoring strategy for Lake Merritt low dissolved oxygen TMDL alternative</p>	 	<p>Collected enterococcus and Microbial Source Tracking data over two wet and two dry seasons in 6 Bay beaches in San Mateo County.</p> <p>Analyzed data collected in 2024 and prepared monitoring plan for 2025. Due to loss of contract resources, summer 2025 monitoring will be reduced and the technical advisory committee to advise on the project cannot be maintained. We are requesting use of EPA 205(j) funds to support this project starting in summer 2026.</p>
Develop Polychlorinated Biphenyls (PCBs) TMDL revision strategy	Oversee data collection, modeling, and analysis for PCBs TMDL Revision		Regional Monitoring Program PCB Workgroup developed proposals for SFEI to collect information and data to provide a science synthesis. Integrated modeling and monitoring strategy are ongoing.
Develop Mercury TMDL Revision Strategy	Oversee data collection and synthesis for Mercury TMDL Revision		Mercury TMDL Strategy Team that consists of the Water Board, SFEI, and municipal agency representatives have been meeting quarterly to discuss information needs for the TMDL Revision. SFEI developed projects for data synthesis and fieldwork that will form the scientific basis of the TMDL Revision.
Communicate TMDL water quality outcomes to the public	Publish TMDL water quality report cards, update TMDL websites for current projects		A Water Quality Report Card for sediment impairment in Napa River Watershed was developed and submitted to the State Water Board and U.S. EPA.

SURFACE WATER AMBIENT MONITORING PROGRAM

PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Monitor in support of the TMDL Program	<p>Collect data to support impairment assessment for low dissolved oxygen in Suisun Creek</p> <p>Collect nutrient and dissolved oxygen data to support Lake Merritt low dissolved oxygen TMDL alternative</p>	 	<p>Dissolved oxygen data were collected and analyzed.</p> <p>Nutrient and dissolved oxygen data were collected and analyzed.</p>
Collect Nutrient data to inform the Statewide Biostimulatory Policy	<p>Continue to collect nutrient samples across non-impacted streams to support realistic expectation for nutrient levels in Bay Area streams</p> <p>Participate in Statewide biostimulatory policy meetings</p>	 	<p>Nutrients and bioassessment samples were collected and analyzed.</p> <p>Staff participated in a series of biostimulatory meetings and offered written feedback on the statewide policy options and implementation considerations.</p>
Strengthen relationships with underrepresented communities	<p>Continue key monitoring and education outreach with underrepresented communities</p>		<p>Staff conducted three educational outreach sessions with two community groups.</p>




WASTEWATER AND FLOOD MANAGEMENT INFRASTRUCTURE RENEWAL



PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Ensure climate change resiliency (e.g., related to sea level rise, groundwater rise, and wildfires) in wastewater infrastructure renewal projects	<p>Participate in forums to encourage infrastructure renewal that provides multiple benefits</p> <p>Facilitate infrastructure renewal through other permit-related tasks</p>		<p>Continued to participate in forums to encourage infrastructure renewal that provides multiple benefits. Reviewed contingency plans when inspecting facilities.</p>

PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Understand and control potential water quality impacts of nutrients	Coordinate with the Nutrient Management Strategy to study the Bay's response to nutrient loads under different scenarios and work to develop load allocations for municipal wastewater treatment plants that are protective of San Francisco Bay		Reissued the Nutrient Watershed Permit in July 2024. This Permit required municipal wastewater treatment plants to collectively reduce dry-weather total inorganic nitrogen loads to San Francisco Bay by 40 percent from 2022 levels within 10 years. Additionally, it included associated load reduction effluent limits for each of the municipal wastewater treatment plants.
Understand and control potential water quality impacts of contaminants of emerging concern	Work through the Regional Monitoring Program's Emerging Contaminants Workgroup to identify potential impacts of constituents of emerging concern on water quality		The Bay Area Clean Water Agencies are funding an ongoing study by the San Francisco Estuary Institute (SFEI) on per- and polyfluoroalkyl substances (PFAS) in municipal wastewater. Phase 3 of the study plans to measure PFAS in consumer products and assess the impacts of these products on wastewater and urban stormwater.
Reduce sanitary sewer overflows	Inspect facilities and review Sewer System Management Plans		Inspected 5 sanitary sewer systems (4 percent of the total), which included reviewing wastewater agencies' Sewer System Management Plans for consistency with the new Statewide General Order. We did not meet our goal of inspecting 5 percent of sanitary sewer systems due to staffing limitations.



REGULATE



WASTEWATER DISCHARGES TO SURFACE WATERS

PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Reissue National Pollutant Discharge Elimination (NPDES) permits every five years and maintain our backlog of expired permits below 17 percent	Reissue 14 permits		Reissued 13 permits, including the Nutrient Watershed Permit. As of July 1, 2025, about 20 percent of the NPDES permits were expired. We had significant delays with several permit reissuances due to the U.S. Supreme Court's ruling in <i>City and County of San Francisco, California v. Environmental Protection Agency</i> (2025) 145 S.Ct. 704, which held that NPDES permits may not include end-result requirements under the Clean Water Act.
Inspect major facilities at least every other year and minor facilities at least once every five years	Inspect 28 facilities		Inspected 32 facilities.
Support the Nutrient Management Strategy (NMS) and development of dissolved oxygen assessment framework	Work with NMS to develop assessment framework 2.0 to support next nutrient watershed permit		Completed with the reissuance of the Nutrient Watershed Permit in July 2024. Following completion, we worked with the San Francisco Bay Nutrient Management Strategy Steering Committee to update the Science Plan for the next five years (2025-2030), identifying projects that address needs that have arisen due to the 2022 <i>Heterosigma akashiwo</i> bloom that resulted in widespread fish kills.




PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Understand and control effects of nutrients discharges	Track each discharger's progress and regional coordination to comply with Nutrients Watershed Permit requirements as soon as possible Identify how further reductions can be achieved, particularly through water recycling and nature-based solutions, including long-term multi-benefit solutions		The Bay Area Clean Water Agencies submitted the Nutrient Watershed Permit Group Annual Report, which includes a preliminary analysis on projects that municipal wastewater treatment plants are considering or implementing to reduce total inorganic nitrogen loads to San Francisco Bay.
Oversee compliance with both regional and statewide general NPDES wastewater permits	Issue and rescind authorizations to discharge Inspect at least 2 facilities		Continued oversight of 12 regional and statewide general permits, reviewing >100 monitoring reports; inspecting 2 facilities; and issuing, modifying, or rescinding authorizations to discharge for >30 enrollees.




WASTEWATER DISCHARGES TO LAND

PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Implement the statewide General Waste Discharge Requirements for Winery Process Water	Enroll at least 10 wineries under the Winery General Order Conduct follow-up with wineries that failed to enroll in the Winery General Order		Enrolled 14 wineries. Conducted desktop reviews to identify wineries that failed to enroll in the Winery Order; inspected >25 wineries that need to enroll. Continued bi-monthly meetings with Napa County Environmental Health.
Implement the Onsite Wastewater Treatment System (OWTS) Policy	Work with counties on revised Local Agency Management Programs (LAMPs) for approval and implementation; ensure that potential effects of climate change on OWTS are addressed in LAMPs		Ongoing. Continued coordination with Marin County, Napa County, Contra Costa County, and Sonoma County.






PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Manage new and existing waste discharges to land	<p>Transition at least 2 individual WDRs to general WDRs (or update individual WDRs as appropriate); include conditions in updated permits to address potential effects of climate change on wastewater systems as appropriate</p> <p>Inspect 12 facilities and conduct appropriate follow-up actions</p>	<div data-bbox="1213 297 1276 354"></div> <div data-bbox="1213 638 1276 695"></div>	<p>Did not complete transitions due to other priorities arising, including permitting of the Montezuma Waste Handling Facility dewatering discharge to land and reviewing Reports of Waste Discharge for new potential community wastewater systems for proposed housing developments. The transition of several individual WDRs to general WDRs is in progress.</p> <p>Inspected 11 permitted WDR facilities, 1 biosolids land application site, >25 unpermitted wineries, and 4 new potential community wastewater system sites. Issued 17 inspection reports, many of which included required follow-up actions.</p>

MUNICIPAL STORMWATER PROGRAM




PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Reduce trash discharges	<p>Conduct inspections to verify trash control effectiveness, including both trash capture devices and on-land cleanup</p> <p>Continue to work with Permittees to address discharges of trash associated with unsheltered homelessness</p>		<p>Water Board staff inspected seven Permittees to ensure trash capture devices and on-land cleanup were effectively controlling trash. Staff also met with Phase I Permittees not expecting to meet the June 30, 2025, deadline to discuss their plans to achieve 100 percent trash load reduction.</p> <p>Water Board staff continue to coordinate with Permittees to respond to reports of trash discharges related to illegal dumping and unsheltered homelessness. Staff participated in meetings to discuss ongoing work and scheduled a site visit with the City of San Jose in September.</p>
Continue to reduce discharges of pollutants that impair receiving waters, including discharges of PCBs to San Francisco Bay	Review Permittee progress on implementation of PCBs control measures		Water Board staff reviewed annual reports and other deliverables to ensure Permittees are meeting PCB and mercury permit requirements. Water Board staff and Permittees began meeting quarterly to discuss ongoing work related to PCBs and mercury and discuss future permitting framework.
Support municipal implementation of multi-benefit green stormwater infrastructure designs that address polluted runoff and achieve co-benefits such as climate change resilience and water supply resilience	Meet with Permittees regarding long-term green infrastructure planning and development of optional tree-based stormwater treatment system proposal		The Long-Term Green Stormwater Infrastructure Technical Workgroup has been meeting quarterly. The Workgroup has come to a general agreement on a future permitting framework that will add flexibility and encourage multi-benefit projects. The Workgroup's report is due in September 2025.




PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Work with Caltrans to support its achievement of trash reduction in the 2019 Cease and Desist Order (CDO) issued by the Board	Work with Caltrans on progress towards CDO-required control of trash discharges from 6,000 acres of right-of-way by June 30, 2024, and report to Board on status		Caltrans has made significant progress in implementing structural controls to control trash discharges from its Bay Area right-of-way. Water Board staff continued to engage with Caltrans as they implement structural control pilot testing; corridor feasibility studies; and trash discharge studies to demonstrate benefits of nonstructural controls. Staff provided an informational update at the December 2024 Board meeting.
Coordinate with Caltrans and Bay Area municipalities to support implementation of projects to reduce discharges of trash and other impairing pollutants	Complete project-specific and programmatic coordination consistent with CDO implementation		In FY 24/25, Caltrans executed 3 new partnership projects, 4 partnership projects completed construction, and 4 partnership projects continue active construction. These 11 projects control trash from 384 acres of Caltrans right-of-way and 7,231 acres of municipal right-of-way. Caltrans is actively developing 5 new municipal partnership projects for the construction of 12 full trash capture devices with contract execution expected in the first quarter of FY 25/26.
Coordinate with State Water Board staff and Phase II Permittees on permit reissuance of the Small and Non-Traditional Municipal Stormwater Permit	Continue to provide input at requested intervals along with other Regional Boards to State Board staff Respond to comments on San Francisco Bay Region's region-specific TMDL implementation language		Staff responded to informal comments from Permittees and updated draft permit language accordingly. Staff will continue to coordinate permit reissuance with State Water Board staff and Permittees.

INDUSTRIAL AND CONSTRUCTION STORMWATER PROGRAM

PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Prioritize cases and coordinate with municipal inspectors to maximize our effectiveness in protecting water quality	Determine how to utilize climate risk data in our facility/site inspection and review prioritization framework, including sea level rise and groundwater rise data Participate in countywide clean water program trainings and workshops to build and maintain relationships with municipal stormwater inspectors	 	In progress. Participated in two countywide clean water program trainings – Alameda County and Santa Clara County.
Ensure permit compliance through targeted inspections and in-office desktop reviews	Inspect 10% of permitted facilities/sites		Did not meet inspection targets due to staff vacancies.
Process permittee submittals in a timely and consistent manner	Review requests for changes of information and notices of termination within two weeks; upon receipt of complete applications, process changes of information and notices of termination in accordance with processing guidelines		Completed.
Support efforts to continuously improve the program	Provide regional input to State Water Board staff for permit reissuance		Completed for FY 24/25.

CREEK, WETLAND, AND BAY HABITAT PROTECTION PROGRAM







PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Review and process applications in a timely and consistent manner	<p>Issue 401 certifications in under 60 days for small projects and under one year for large, complex projects</p> <p>Participate on the mitigation banking interagency review team to approve mitigation banks that will provide mitigation credits for project impacts</p> <p>Approve Ducks Unlimited's In-Lieu Fee Instrument to provide wetland mitigation credit for project impacts</p> <p>Reissue East Bay Regional Park District's Maintenance WDRs</p>		<p>Issued 234 401 certifications.</p> <p>Halo Ranch Mitigation Bank was approved on February 4, 2025.</p> <p>SF Bay In-Lieu Fee Plan (Ducks Unlimited) was approved on March 18, 2025.</p> <p>East Bay Regional Park District's Maintenance WDRs were reissued.</p>
Provide support to projects that involve significant climate change risks	Participate in multi-agency meetings to inform the San Francisco Waterfront Resilience Program and the draft San Francisco Waterfront Flood Study		Continue to participate in multi-agency meetings to address significant climate change risks.
Implement and update existing stream maintenance authorizations for Bay Area flood management agencies	Update programmatic stream maintenance authorization for Marin County		Programmatic stream maintenance was re-authorized for Napa County on March 19, 2025.

PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Participate in the Wetland Regional Monitoring Program (WRMP) to improve alignment among regulatory agencies for permit-driven monitoring requirements	<p>Participate in multi-agency meetings to inform the WRMP's goals to improve alignment on permit monitoring requirements</p> <p>Work with San Francisco Estuary Partnership and San Francisco Estuary Institute to draft a proposal to incorporate the WRMP into U.S. Army Corps of Engineers, Water Board, and Bay Conservation and Development Commission permits</p>		<p>Continued to participate in multi-agency meetings and staff have developed a conceptual proposal to incorporate the WRMP into permits to meet agency needs while reducing monitoring costs for project proponents. Staff are currently working on performance criteria and other details to fulfill the regulatory requirements for the permitting agencies.</p>
Participate on the Bay Restoration Regulatory Integration Team (BRRIT) team and its associated Policy and Management Committee to facilitate timely issuance of Certifications for Measure AA-funded projects geared toward sea level rise adaptation	<p>Continue to participate in BRRIT to support timely issuance of authorizations for Bay restoration projects</p> <p>Complete grant agreement with the San Francisco Bay Restoration Authority for continued funding of the Board's BRRIT position</p>	 	<p>Continued to participate in BRRIT to support timely approvals of Bay restoration projects. Two projects were fully permitted (Novato Deer Island Tidal Wetlands Restoration and India Basin Shoreline Park Phase 3) and two projects completed construction (Terminal 4 Wharf, Warehouse, and Pilings Removal Project and Pacheco Marsh Public Access Improvements).</p>

DREDGING PROGRAM

PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Promote the beneficial reuse of dredged sediment	<p>Complete CEQA/NEPA process for the U.S. Army Corps of Engineers (USACE) 2025-2029 maintenance dredging 401 Certification/WDRs</p> <p>Adopt 401 Certification/WDRs for the U.S. Army Corps of Engineers' 2025-2029 maintenance dredging that incorporates strategic placement and other innovative approaches to increase beneficial reuse of dredged sediment</p> <p>Issue 401 Certifications for mid-sized and small dredgers</p>	<div data-bbox="1220 386 1270 440"></div> <div data-bbox="1220 618 1270 672"></div> <div data-bbox="1220 850 1270 904"></div>	<p>We coordinated with USACE to write and release a draft CEQA NEPA document for public comment in October 2024. Due to extensive comments, the adoption date for the final EIR was postponed to FY 25/26. We anticipate posting the response to comments and revised EIR in fall 2026.</p> <p>USACE used federal funds to beneficially reuse over 1,000,000 cubic yards of dredged sediment in 2024. Due to delays in the CEQA/NEPA document, we issued a one-year 401 Certification in March 2025 to permit USACE maintenance dredging for 2025. We will adopt the four-year permit in FY 25/26.</p> <p>Staff issued new 401 Certifications and approvals for small and medium sized dredgers during the fiscal year.</p>





LAND DISPOSAL PROGRAM



PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Update landfill and land disposal Waste Discharge Requirements (WDRs) as necessary, including to address PFAS	<p>Issue or update at least 3 WDRs; consider developing new general WDRs for closed landfills to replace individual WDRs to streamline regulation of these facilities</p> <p>Require PFAS monitoring at landfills and other land disposal facilities, including sites not covered by the Statewide PFAS landfill order</p> <p>Require additional PFAS investigations as needed as follow up to State Board PFAS Order</p>	  	<p>Issued 2 WDRs; prepared 3 WDRs on schedule, but 1 was delayed due to legal support resource constraints.</p> <p>Issued a 13267 order in March 2025 requiring 12 closed landfills not covered by the Statewide PFAS landfill order to comply with similar requirements.</p> <p>Completed (same as above).</p>
Oversee redevelopment of closed landfills for commercial and recreational purposes	Review and comment on documents that pertain to aspects of development with the potential to impact groundwater and surface water quality		Completed.
Regulate bayfront land disposal facilities that are vulnerable to sea level rise	<p>Review 27 Long-Term Flood Protection Plans to ensure compliance with Order R2-2024-0002, Amending Waste Discharge Requirements for Oceanfront and Bayfront Landfills and Industrial Facilities</p> <p>Require long-term flood protection planning at sites not subject to WDRs as needed</p>	 	<p>Completed. Reviewed Long-Term Flood Protection Plans for all 27 facilities. All plans have been approved except for one being revised to address deficiencies.</p> <p>Like last fiscal year, no sites were identified as a priority.</p>

AGRICULTURAL LANDS PROGRAMS

PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Enroll facilities in Confined Animal Facilities (CAF) Waste Discharge Requirements (WDRs)	Support development of Ranch Plans and Monitoring Plans for new and existing enrollees Manage CAF program for all dairies and other CAFs in impaired watershed via report review, non-filer follow-up, interagency coordination, compliance assistance, and enforcement	✓	Completed.
Increase inspection presence for all programs	Inspect at least 10 grazing operations and 5 CAF operations Inspect 1 high-risk outdoor cannabis operation	✓	Completed.
Manage Grazing Waiver	Reissue/Revise Grazing Waiver	✓	Revised Conditional Waiver for Grazing was adopted at the July 9, 2025 Board Meeting.
Manage existing grants	Manage 8 Nonpoint Source Program grants, facilitate new grant proposals, and participate in statewide grant selection process	✓	Completed.



RECYCLED WATER PROGRAM


PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Review new recycled water applications and authorize projects in coordination with the Division of Drinking Water	Continue to support permitting for Valley Water Purified Water Project Enroll onsite recycled water projects in the statewide general order for small domestic wastewater systems		Valley Water Purified Water Project shifted to direct potable reuse project. On track – continuing to process applications. Kenwood Ranch (Sonoma) Notice of Applicability for enrollment drafted.
Update existing recycled water permits as needed in alignment with the Recycled Water Policy	Transition individual or regional recycled water orders to the statewide general order for recycled water use, or update individual orders as appropriate; include conditions in updated permits to address potential effects of climate change on recycled water systems as appropriate		In progress – City of Palo Alto, South Bay Water Recycling Program, Sunnyvale, and Marin Municipal Water District. On track – South Bay Water Recycling Program Notice of Applicability for enrollment drafted.
Ensure recycled water program compliance through targeted inspections and annual report reviews	Review annual reports and follow up on any deficiencies Inspect four recycled water facilities and/or use areas and conduct appropriate follow-up actions	 	Developed an annual monitoring report processing internal guideline and completed reviews of annual reports for priority facilities. Inspected four recycled water facilities (three municipal recycled water facilities in coordination with NPDES and one recycled water facility with Division of Drinking Water).


PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Engage in collaborative efforts that promote increases in recycled water in the Region	<p>Begin to develop strategy on where to prioritize Water Board recycled water efforts to enable increases in water recycling</p> <p>Engage with recycled water stakeholders to share resources, reduce barriers, and support the broader use of recycled water</p>		<p>A new position was established in Fall 2024 to support regional recycled water planning. The initial hire in November made progress on early project milestones but departed the Water Board in May. A new staff member began in August and is now continuing the work.</p> <p>Staff met with WaterReuse to discuss the progress on the development of the Onsite Use of Nonpotable Water regulations.</p> <p>Staff attend the quarterly BACWA Recycled Water Committee meetings.</p>
Identify opportunities to standardize and streamline recycled water permitting	<p>Engage with State Water Board's Division of Drinking Water and the Recycled Water Roundtable to provide input on the development of new and updated recycled water regulations</p>		<p>Ongoing.</p>


CLEAN UP


SITE CLEANUP AND UNDERGROUND STORAGE TANK PROGRAMS

PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Ensure cleanup cases are prioritized and that regulatory actions are taken to control vapor intrusion, contaminant migration, and other exposures and discharges as quickly as reasonably feasible to protect water quality, human health, and the environment	<p>Prioritize cleanup cases based on risk, threat, and environmental justice factors</p> <p>Take regulatory action to control contaminant exposure, migration, and discharge</p> <p>Identify and prioritize enforcement actions necessary to achieve regulatory compliance</p>		Continued to prioritize and implement regulatory and enforcement actions based on risk, threat, and environmental justice factors to control exposure and migration. Identify and prioritize enforcement actions as needed to ensure compliance.
Address potential adverse impacts from sea level rise and groundwater rise	<p>Require sea level rise and groundwater rise vulnerability assessments at shoreline cleanup sites when evaluating remedial action plans, monitoring program changes, and during 5-year reviews</p> <p>Assess potential sea level rise and groundwater rise adverse impacts when considering low-threat case closure</p> <p>Track cleanup sites that have assessed sea level rise and groundwater rise vulnerability</p> <p>Continue to engage and inform communities and other stakeholders about our actions</p> <p>Incorporate research findings and guidance from other State agencies into our case management strategy for evaluating sea level and groundwater rise</p>		Completed and ongoing. Required vulnerability assessments at 12 active shoreline cleanup sites to evaluate the need for additional actions. Incorporated vulnerability assessments into our low-threat assessment process on 16 cases in the past year. Going forward, all case closures will be required to evaluate sea level and groundwater rise as part of the case closure or No Further Action determination. Updated our tracking spreadsheet with all actions related to vulnerability assessment requests and submittals. Updated our mapping tool to identify vulnerable cleanup sites using the latest research and California Ocean Protection Council's sea level rise guidance.





PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Update the Environmental Screening Levels (ESLs) to be consistent with the latest science (e.g., toxicity criteria)	Begin update, consisting primarily of revisions to the human health toxicity criteria hierarchy and the addition of PFAS into the ESL workbook and user's guide		On track to publish the update during 2025.

PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Apply Environmental Justice lens to inform cleanup priorities	<p>Identify and implement regulatory actions for active cases in EJ communities to reduce pollution risks and threats</p> <p>Prioritize backlogged (i.e., inactive) cases in EJ communities based on risks and threats for regulatory action</p> <p>Track regulatory actions for cases in EJ communities</p> <p>Review our existing guidance for public participation and identify ways to enhance outreach and engagement activities for cleanup sites in EJ communities and tribal lands</p> <p>Keep EJ advocates, organizations, and tribes informed about our regulatory actions at cleanup sites in their communities and historical lands</p> <p>Coordinate with the State Board, Department of Toxic Substances Control, and U.S. Environmental Protection Agency to distribute fact sheets and information about grants and resources available for site investigation and cleanup</p> <p>Seek feedback from communities and tribes to improve our outreach and engagement actions</p>		<p>Continued to prioritize the 101 active sites in our cleanup program located in EJ communities. Required remediation at 5 sites and closed 3 other sites. Continued to push for investigation and mitigation measures to identify and quickly address any exposures at sites located in EJ communities.</p> <p>Finished reviewing all inactive cleanup program cases located in disadvantaged communities.</p> <p>Continued outreach efforts to inform and gain feedback from EJ advocates, organizations, and tribes.</p> <p>Continued to keep Water Board Staff informed of current state and federal funding opportunities for brownfield site investigation and cleanup.</p>

PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Assess and investigate potential PFAS discharges	<p>Ensure compliance with State Board PFAS Order requirements; identify facilities where PFAS were likely used, stored, or discharged</p> <p>Prioritize PFAS investigations at fire stations and other suspected discharge facilities in the vicinity of drinking water supply wells and surface water</p> <p>Coordinate findings with the Division of Drinking Water and local water agencies</p>		<p>Issued directives for additional investigation at sites subject to the State Board PFAS investigation orders issued in 2019-2021 for airports, landfills, and chrome plating facilities.</p> <p>Analyzed initial data and required additional site investigation from five fire stations and fire training facilities that may have discharged PFAS to groundwater. Identified five additional industrial sites that may be potential PFAS sources to known drinking water supply well impacts in the Livermore Valley.</p> <p>Began taking actions to remove sources and mitigate ongoing PFAS discharges.</p> <p>Met quarterly with Division of Drinking Water, San Jose Water Company, and Valley Water to discuss PFAS-impacted supply wells and investigations of potential source sites.</p>

PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Assess, investigate, and cleanup PCBs discharges at upland source sites and creek/Bay sediments and known TMDL hotspots	<p>Map available sediment sample data from municipal storm drains to identify potential upland source properties</p> <p>Require potential upland source properties to sample soil and sediment that could indicate a PCBs discharge</p> <p>Require investigation and cleanup of upland source properties where evidence of PCBs discharge is found</p> <p>Coordinate with municipalities and U.S. Environmental Protection Agency, and other state and federal agencies to follow up on investigation progress</p> <p>Coordinate with internal stormwater and TMDL program staff to effectively implement the PCBs TMDL</p>		<p>In collaboration with TMDL program staff, produced and published a new fact sheet about the source property referral process.</p> <p>Required investigation of three potential PCBs source properties that were identified through the source property referral process.</p> <p>Met quarterly with local agencies representing two different counties to improve the source property identification and investigation process.</p> <p>Continued to improve regular coordination with internal stormwater and TMDL program staff, including explaining the source property referral and site investigation and cleanup process to newly hired staff.</p>

DEPARTMENT OF DEFENSE AND ENERGY PROGRAM

PROGRAM Priority Action	FY24/25 TARGETS & MILESTONES		STATUS
Ensure the investigation and cleanup of the Region's former and active Department of Defense (DoD) and Department of Energy (DoE) facilities to protect water quality, human health, and the environment prior to property transfer	Facilitate timely site investigation and cleanup by reviewing and commenting on draft, draft final, and final documents in accordance with federal schedules		Completed. We raised water quality issues in the five-year reviews for the former Hunters Point Naval Shipyard and Moffett Naval Air Station, as related to existing chemical of concerns and PFAS.
	Actively participate in resolving formal disputes to expedite site cleanups		Resolved the formal dispute at the former Oakland Army Reserve Base in January 2025 enabling the Army to move forward with developing a sediment cleanup plan.
Address potential adverse impacts from climate change, such as sea level rise and groundwater rise	Advocate for the evaluation of climate change effects to ensure remedies are protective		Directed Department of Defense facilities to evaluate climate change impacts when evaluating the effectiveness of soil and groundwater cleanup.
Apply environmental justice lens to inform priorities	Commit staff and management resources to attend community meetings in the Hunters Point neighborhood in San Francisco and at other facilities		Completed.

ENFORCE

ENFORCEMENT PROGRAM

Our enforcement priority is to prosecute violations that cause significant harm to water quality or program integrity, targeting particularly culpable or recalcitrant parties. Cases may include the following:

- Discharges that result in fish kills or other acute aquatic impacts
- Illegal fill of streams or wetlands, including violation at permitted stream or wetland projects
- Violations of site cleanup requirements
- Violation of construction, industrial, and municipal stormwater permits

We will also continue to maintain a near-zero backlog of mandatory minimum penalty assessments and will assist emergency response and recovery efforts associated with spills, wildfires, and vessels.

PERFORMANCE MEASURES AND TARGETS

CATEGORY	PROGRAM Performance Measure	FY24/25 TARGET	STATUS
PLAN & ASSESS	TOTAL MAXIMUM DAILY LOAD AND BASIN PLANNING		
	Basin Plan Amendments Adopted	0	0
	Pollutant/Waterbody Combinations Addressed	0	0
	TMDLs Adopted/Reconsidered	0	0
REGULATE	NPDES WASTEWATER		
	Major Individual Facilities Inspected	23	26
	Major Individual Permits Issued or Reissued	9	4
	Minor General Facilities Inspected	2	2
	Minor Individual Facilities Inspected	5	6
	Minor Individual Permits Issued or Reissued	5	8
	WASTE DISCHARGE TO LAND — WASTEWATER		
	Individual Waste Discharge Requirements Updated	0	0
	Waste Discharge to Land Inspections	12	12
	NPDES STORMWATER		
	Stormwater Municipal Inspections	12	17
	Stormwater Industrial Inspections	120	51
	Stormwater Construction Inspections	125	50
	LAND DISPOSAL		
	Landfill Individual Permits Updated	2	1
	Landfill Facilities Inspections	40	43
	All Other Inspections - Land Disposal	15	10

CATEGORY	PROGRAM Performance Measure	FY24/25 TARGET	STATUS
	All Other Individual Permits Updated - Land Disposal	1	1
	CONFINED ANIMAL FACILITIES		
	Confined Animal Facilities Inspections	5	6
CLEAN UP	CLEAN UP		
	Underground Storage Tank Sites into Active Remediation	5	7
	Cleanup Sites Into Active Remediation	15	26
	Department of Defense Sites into Active Remediation	0	2
	Underground Storage Tank Sites Closed	20	25
	Cleanup Sites Closed	25	33
ENFORCEMENT	ENFORCEMENT		
	Respond to serious priority violations with formal enforcement or investigative order within 18 months	80%	100%
	Assess mandatory minimum penalties within 18 months	80%	68%