

**STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

**STAFF SUMMARY REPORT: Eileen M. White
MEETING DATE: September 10, 2025**

ITEM: 6

**San Francisco Bay Regional Water Quality Control Board Strategic Workplan –
Status Update on Fiscal Year 2024/25 Performance Measures – Informational Item**

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DISCUSSION

This item provides a status update on the implementation of our San Francisco Bay Regional Water Quality Control Board Strategic Workplan (Strategic Workplan) for fiscal year (FY) 2024/25. The Strategic Workplan was developed to provide an overview of what we do and to create transparency about our work for the public we serve. It describes our overarching organizational priorities, and the water quality programs we implement to achieve our mission to preserve, enhance, and restore the quality of the San Francisco Bay Region's water resources for the protection of the environment, public health, and beneficial uses.

The Strategic Workplan includes organizational priorities and actions, priorities by program and associated targets and milestones, and performance measures and targets tracked by the State Water Board. We implemented our programs with a focus on the priorities included in the Strategic Workplan and a goal of achieving our targets and milestones. Appendix A contains the tables from the Strategic Workplan annotated with fiscal year 2024/25 status updates.

Below is a summary of our progress in addressing our three overarching organizational priorities: climate action, environmental justice and racial equity, and workforce planning and development. For our water quality programs, we highlight key accomplishments organized by the Workplan categories: Plan and Assess, Regulate, Clean Up, and Enforce.

Climate Action

We continued our ongoing work to incorporate climate action into all our program activities and utilize our authority to advance climate adaptation planning, coordination, technical assistance, and permitting, including the following:

- We participated in 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. We also continued to participate in local efforts, such as the [Resilient SR-37 Partnership](#), [Oakland Alameda Adaptation Committee](#), [San Francisco Waterfront](#)

[Resilience Program](#), and [City of San Rafael's Canal Community Planning Project](#).

- We continued our work with the Association of Bay Area Governments, the Bay Area Air Quality Management District, the California State Coastal Conservancy, Caltrans District 4, the Metropolitan Transportation Commission, and the San Francisco Bay Conservation and Development Commission to address increased threats of flooding and sea level rise in the nine county San Francisco Bay Area region.
- We, in partnership with the U.S. Army Corps of Engineers (Corps), prepared and released for public review the draft Joint Environmental Assessment and Environmental Impact Report (EA/EIR) for the San Francisco Bay Federal Channel Maintenance Dredging Program (Program). This document included analysis of alternatives to increase beneficial reuse of dredged sediment to restore Bay tidal wetlands and adapt to rising sea levels. These alternatives involve offsetting additional costs of beneficial reuse by allowing more placement of sediment at disposal sites within the Bay rather than deep ocean and by allowing more hydraulic dredging rather than clamshell dredging. We are currently working on responding to comments and expect to bring the revised EA/EIR along with Waste Discharge Requirements and Water Quality Certification for the Program to the Board later this year.
- The Bay Restoration Regulatory Integration Team (BRRIT) continues to improve permitting for multi-benefit habitat 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). The BRRIT is also working closely with the Santa Clara Valley Transportation Authority to provide early feedback and guidance on the Beneficial Reuse of BART Silicon Valley Phase II Tunnel Excavated Material in Marsh Restoration at the Former Salt Ponds Project. For example, the BRRIT is providing guidance on potential night-time work, sediment transport methods and infrastructure, options for managing turbidity during sediment placement, and bioassay testing requirements for beneficial reuse.
- We reviewed the Long-Term Flood Protection Plans submitted in response to an amendment of waste discharge requirements issued in February 2024 for 19 bayfront and oceanfront landfills and 8 industrial facilities. The plans identify long-term flood protection strategies by evaluating the potential and predicted impacts of climate change, specifically groundwater rise, sea level rise, and extreme climate events based on the latest state guidance and emerging science. We encouraged collaboration with other sites and projects within the Operational Landscape Units and requested revisions to several of the plans to address deficiencies.
- We required vulnerability assessments at 12 active shoreline cleanup sites to evaluate the need for additional actions. We also incorporated vulnerability assessments into our low-threat case closure 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. We continue to update our mapping tool to identify vulnerable cleanup sites using the latest research and California Ocean Protection Council's sea level rise predictions.

Racial Equity and Environmental Justice

We prioritized program activities to protect water quality and beneficial water uses in communities that have experienced historical racism and environmental injustice, including the following:

- We participated in coordinated multi-agency efforts with U.S. EPA, CalEPA, the Department of Toxic Substances Control, and others to engage in racial equity and environmental justice work such as the ongoing clean-up of contamination at the former Hunters Point Naval Shipyard in San Francisco.
- We continued to coordinate with Native American Tribes on a Basin Plan Amendment to designate water bodies with the Tribal Tradition and Culture¹ and Tribal Subsistence Fishing² Beneficial Uses.
- On January 15, 2025, we signed a Memorandum of Understanding ([West Oakland Environmental Indicators Project \(WOEIP\) Collaborative Memorandum](#)) between the U.S. Environmental Protection Agency Region 9, the California Environmental Protection Agency, the California State Water Resources Control Board, the San Francisco Bay Regional Water Quality Control Board, the Bay Area Air Quality Management District, the California Department of Toxic Substances Control, the West Oakland Environmental Indicators Project (a resident led community-based environmental justice organization), and Radius Recycling Inc. (formerly known as Schnitzer Steel) regarding metal recycling operations in West Oakland. The parties seek continued and expanded collaboration with each other to address impacts caused or posed by metal shredding operations in West Oakland. The parties will explore how these goals can be achieved.
- On January 15, 2025, a Statement of Resolution for the formal dispute at the former Oakland Army Reserve Base was signed by our Executive Officer, the Deputy Director of the Site Mitigation and Restoration Program for the Department of Toxic Substances Control (DTSC), and the United States Army's Assistant Secretary for Installations, Energy and Environment. We, along with DTSC, had been in dispute with the Army since 2017 and formal dispute since

¹ Tribal Tradition and Culture: Uses of water that support the cultural, spiritual, ceremonial, or traditional rights or lifeways of California Native American Tribes, including, but not limited to, navigation, ceremonies, or fishing, gathering, or consumption of natural aquatic resources, including fish, shellfish, vegetation, and materials.

² Tribal Subsistence Fishing: Uses of water involving the non-commercial catching or gathering of natural aquatic resources, including fish and shellfish, for consumption by individuals, households, or communities of California Native American Tribes to meet needs for sustenance.

July 19, 2021, regarding the cleanup of marine sediments at Parcel 1 of the former base, which is located on the east shore of the San Francisco Bay in West Oakland. The dispute centered on the Army's refusal to acknowledge the unacceptable health risks posed by polychlorinated biphenyl (PCB) contamination in sediment to people consuming fish caught in the Bay. We insisted that the Army needs to cleanup PCB contaminated sediments so that the East Bay Regional Park District, who is the scheduled property recipient, can redevelop Parcel 1 into an urban park (with a fishing dock) that will serve the West Oakland community. As part of the dispute resolution, the Army agreed that the cleanup of Parcel 1 sediments should address fish consumption risks. It has also agreed to assess active remedial alternatives for the sediment contamination. PCB sediment cleanup at Parcel 1 will reduce health risks to the West Oakland Community, which has disproportionately been affected by environmental injustices. In addition, this PCB cleanup will aid in achieving our overall PCB Total Maximum Daily Load goals for the Bay.

- We identified that 101 of our 628 active Site Cleanup Program sites are in environmental justice communities. We continued to prioritize these and track cleanup progress with the goal of ensuring that cases are moving forward so that possible health and environmental exposures are identified and addressed as quickly as possible. We required remediation at 5 sites and closed 3 sites. We continued to push for investigation and mitigation measures to identify and quickly address any exposures at sites located in disadvantaged communities.

Workforce Planning and Development

As part of our ongoing commitment to workforce development and program effectiveness, we implemented a reorganization of our surface water divisions to strengthen staff capacity and enhance program delivery. This initiative reflects both our responsibility to support staff well-being and our dedication to providing timely, high-quality service to the public.

A key goal of the reorganization was to balance workloads across divisions by strategically aligning related programs and consolidating program staff to dedicated sections. By aligning staff resources, we can manage our programs more effectively while maintaining the flexibility to address emerging priorities.

The reorganization established a new section within the Watershed Management Division dedicated to the Creek, Wetland, and Bay Habitat Protection Program. This strengthens our ability to manage a growing workload in this program, while also enhancing technical skills, program consistency, and accountability.

We continued to promote and maintain an environment that attracts, retains, and engages a talented, diverse, and inclusive workforce in support of our mission, including the following:

- We continue to implement succession planning projects to facilitate the transfer of critical program knowledge as we experience a significant influx of retirements.

About 70 staff have been hired or promoted to new positions in the last three years, and many of the new staff are early career professionals. For example, our Land Disposal Program manager documented more than a decade of institutional knowledge about the land disposal and abandoned mines programs in a 66-page Primer before retiring in June 2025. The Primer will serve as a resource for not only our staff in the Land Disposal Program, but Land Disposal Program staff across the state and other programs within our Region.

- We conducted several in-house training courses: a course on Site Inspections, a course on Racial Equity and Environmental Justice, a course on Enforcement, and a course on the Site Cleanup Program.
- Although the budget deficit and associated restrictions have reduced our ability to attend conferences, we still managed to attend and present at local conferences and participate or present virtually for other external venues. We continued to share our experience and expertise, collaborate with others, and learn from the growing body of knowledge and passion within our extended community.
- We continued to implement organizational measures that promote and value employee contributions, employee wellness, racial equity, diversity and inclusion, and a learning culture, including supporting opportunities for staff to complete job-related training, supporting staff participation in CalEPA employee affinity groups, and providing a hybrid work environment to minimize commuting time.
- We, like many others, are reinventing the office as we adjust to a hybrid work environment and are adapting as we learn new strategies for creating, maintaining, and strengthening work relationships as we continue to build our team. Programs such as the creation of an onboarding initiative to integrate cohorts of new staff through four in-person events with educational talks, informal lunches, and fun activities add to our cohesion and sense of community. Ongoing events like the annual summer picnic and winter celebration continue to bring staff together for stronger relationships and cross-pollination.

Program Accomplishments

Plan and Assess

- We completed the Triennial Review of the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) consistent with the federal Clean Water Act and California Water Code. The Triennial Review provides the opportunity to review all the water quality standards in the Basin Plan and to identify portions of the Basin Plan that need to be updated or modified. Through this process, the highest priority Basin Plan projects, excluding TMDL projects, identified through this process included: Designating Tribal Tradition and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses; Developing a Climate Change and Shoreline Adaptation Policy; Developing a Climate Change and Riparian Area Protection Policy; Developing a Nutrient Water Quality Attainment Strategy; and Designating Commercial and Sport Fishing Beneficial Uses to Lakes and Reservoirs.

- We continued our collaborative multi-agency engagement on State Highway 37 planning for climate change resilience, with the goal of developing a resilient phased adaptation project that will achieve both transportation and environmental goals.

Regulate

- We continued our collaborative Nutrient Management Strategy with the Bay Area Clean Water Agencies to improve knowledge of the fate and potential adverse consequences of nutrients in San Francisco Bay. We reissued the Nutrient Watershed Permit in July 2024. This 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. The permit was based on many years of monitoring and research with the San Francisco Bay Regional Water Board's partners. Following permit adoption, we worked with the San Francisco Bay Nutrient Management Strategy Steering Committee to update the Science Plan for the next five years (2025-2030). This will ensure that data collection, research, and modeling work over the next five years will support future regulatory decisions.
- The Board reissued 13 National Pollutant Discharge Elimination System (NPDES) permits, and we inspected 32 NPDES wastewater discharge facilities and >40 wastewater discharge to land facilities (inclusive of >25 wineries, as noted in the following bullet point).
- We implemented the Statewide General Waste Discharge Requirements for Winery Process Water (Winery Order), enrolling 14 wineries and conducting outreach. We inspected >25 wineries that failed to submit applications for enrollment in the Winery Order and provided them guidance on how to apply.
- We continued to engage in collaborative efforts that promote increases in recycled water in the Region. A great example of these collaborations is the coordination with Bay Area Clean Water Agencies (BACWA) to convene stakeholders for a workshop at the Elihu Harris State building in August 2024, focused on enhancing interagency collaboration for Bay Area water reuse. In addition, staff participate in statewide recycled water roundtables with the State Water Board and other regions, we coordinate quarterly meetings with the Division of Drinking Water to discuss projects in queue for review, and we attend quarterly meetings with the BACWA recycled water committee. Staff have also participated in BACWA Workshops on the nexus of nutrient removal and water recycling.
- We issued over 230 Water Quality Certifications and Notices of Applicability under general orders for projects discharging fill to creeks, wetlands, and the Bay. The Board reissued programmatic maintenance authorization for East Bay Regional Park District and reauthorized Napa County Flood Control and Water Conservation District's Stream Maintenance Program. The Halo Ranch Mitigation Bank was approved on February 4, 2025, and the San Francisco Bay In-Lieu Fee

Plan (Ducks Unlimited) was approved on March 18, 2025. Both of these programs provide compensatory mitigation credits for off-site project aquatic and species impacts and are particularly useful for projects with small impacts, where on site mitigation is not feasible.

- We continued our work on the Municipal Regional Stormwater NPDES Permit (MRP). We participated in workgroups and technical advisory groups to help guide development of plans and reports to monitor low impact development water quality controls, monitor the effectiveness of trash controls, and develop reports on permittees' best management practices to address discharges associated with unsheltered homelessness and discharges associated with firefighting activities. We provided an update to the Board on MRP Permittees' progress toward meeting the June 30, 2025, 100 percent trash control deadline at the Board's September 2024 meeting. We have been coordinating with Permittees that did not expect to meet the 100 percent deadline and will continue to engage as they implement plans to achieve compliance.
- We participated in the regional board subcommittee and worked with State Board and regional board staff to develop language, including San Francisco Bay region-specific Total Maximum Daily Load (TMDL) requirements, for the reissuance of the Statewide Small and Non-traditional Municipal Stormwater Permit.
- We continued our work with Caltrans, municipalities adjacent to Caltrans right-of-way, and interested stakeholders, including Save the Bay, to reduce trash. Caltrans has made significant progress in implementing structural controls to control trash discharges from its Bay Area right-of-way. 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. We also 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. The corridor-based trash control feasibility studies in Caltrans' prioritized Bay Area highway corridors will identify additional trash control implementation opportunities. We completed two trash control assessments for I-80 and SR 101, and we'll continue working with Caltrans to conduct additional feasibility studies to develop additional trash reduction opportunities. We also inspected more than 1,200 acres of Caltrans right-of-way and provided an update to the Board on Caltrans' compliance with the trash reduction benchmarks and requirements in their 2019 trash control cease-and-desist order at the Board's December 2024 meeting.
- In the Land Disposal Program, which has 11 active landfills and 58 closed landfills, and includes regulatory oversight of abandoned mines, compost operations, and designated waste management units at industrial sites (such as petroleum refineries and chemical plants), we completed 43 landfill inspections and 10 inspections at other types of land disposal facilities.

- The Board issued the Conditional Waiver of Waste Discharge Requirements (Conditional Waiver) for Grazing Operations in Marin, Petaluma, Sonoma and Napa Counties on July 9, 2025. The Conditional Waiver renews and consolidates the existing Grazing Waivers for Tomales Bay, Sonoma Creek, and Napa River watersheds and expands the scope of coverage to include grazing operations located within the Petaluma River watershed and portions of Point Reyes National Seashore that were not previously covered. The Grazing Waiver implements 8 TMDLs and establishes consistent regulatory oversight of grazing operations throughout the Point Reyes National Seashore. Based on previous enrollment, we expect the grazing waiver will regulate about 133 grazing operations on approximately 129,000 acres.

Clean Up

- We continued progress on ensuring the safe reuse of former military bases. We closed 20 military cleanup sites (including privatized and underground storage tank sites) at the active Military Ocean Terminal Concord (MOTCO), former Alameda Naval Air Station, former Concord Naval Weapons Station, former Naval Supply Center Oakland, former San Francisco Nike Battery 93 in San Rafael, former East Fort Baker in Sausalito, former Fort Barry in Sausalito, and Lennar Mare Island in Vallejo. We resolved the formal dispute at the former Oakland Army Reserve Base enabling the Army to move forward with developing a sediment cleanup plan and directed the Department of Defense facilities to evaluate climate change impacts when evaluating the effectiveness of soil and groundwater cleanup. We raised water quality issues in the five-year reviews for Hunters Point Naval Shipyard and Moffett Naval Air Station, as related to existing chemical of concerns and PFAS. We negotiated to have our protectiveness determination included in the Final Five-Year Review for Moffett Naval Air Station and issued an independent protectiveness determination for the Hunters Point Naval Shipyard Final Five-Year Review.
- The Site Cleanup Program (SCP) currently has 628 active cases that we manage and 131 inactive cases that we are systematically reviewing to determine if they should be re-activated, closed, or remain inactive. We exceeded our FY 24/25 performance targets by 50 percent for cases closed and cases moved to remediation. Additionally, of cases that have been sufficiently investigated, 94 percent have human health exposure controlled and 96 percent have groundwater migration controlled.
- A major driver of work for the SCP Program is the threat to human health due to vapor intrusion of contamination from soil vapor to indoor air. More than half of our cleanup cases have soil vapor contamination from vapor-forming chemicals such as tetrachloroethene which was commonly used at dry cleaners for decades. We continued to prioritize vapor intrusion evaluations and accelerate vapor intrusion mitigation actions within days to weeks of discovery for sites with residences and commercial tenants.

- We developed a PFAS webpage to provide information to the public. The website (https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/PFAS.html) is accessible through the San Francisco Bay Regional Water Board's main webpage (<https://www.waterboards.ca.gov/sanfranciscobay/>), under "Featured Topics".
- We prioritized identifying PFAS source properties in areas with known PFAS impacts to drinking water supply wells. We required initial investigations at fire training facilities, fire stations, and an airport in the Livermore Valley and San Jose areas. We requested PFAS sampling at several existing cleanup sites based on historical operations likely to have used and discharged PFAS.
- The Underground Storage Tank (UST) program currently has about 183 active cases, down from 205 last fiscal year. We exceeded our FY 24/25 performance targets for both case closures and cases transitioned into remediation. Much of the program's work continues to support affordable housing and commercial redevelopment. Looking ahead, we anticipate a potential increase in new UST cases next fiscal year due to the regulation requiring the removal of single-wall tanks by December 31, 2025.

Enforce

- We resolved 21 enforcement cases with penalties totaling \$4,766,664. These cases addressed wastewater treatment plant discharges above effluent limits, unauthorized discharges of partially-treated wastewater, failures to submit technical reports required by NPDES permits, and violations of the construction and industrial stormwater general permits. Settlements suspended \$2,262,000 of the penalties upon completion of supplemental environmental projects. We also triaged complaints and spills and assisted regulatory programs with administrative enforcement.

APPENDICES

- A. San Francisco Bay Regional Water Quality Control Board Strategic Workplan Priorities and Performance Measures and Targets
- B. The San Francisco Bay Regional Water Quality Control Board Action Plan for Environmental Justice and Racial Equity

Appendix A

San Francisco Bay Regional Water Quality Control Board
Strategic Workplan Priorities and Performance Measures and Targets

Appendix B

The San Francisco Bay Regional Water Quality Control Board Action Plan for
Environmental Justice and Racial Equity