

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

ANNUAL PERFORMANCE REPORT – Fiscal Year (FY) 2025/26

September 2026

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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 adaptation 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 adaptation to projected sea level rise. Also continued to participate in local efforts, such as the Resilient State Route 37 Partnership, Oakland Alameda Adaptation Committee, San Francisco Waterfront Resilience Program, and the City of San Rafael's Canal Community Resilience Planning Project. Began providing technical assistance to local and regional planners working on the East Bay Crescent Shoreline Planning and Adaptation 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 the U.S. Army Corps of Engineers (Corps), responded to public comments and finalized the joint Environmental Assessment/Environmental Impact Report under the National Environmental Protection Act and California Environmental Quality Act for the San Francisco Bay Federal Channel Maintenance Dredging Program. In addition, adopted 401 Certification/Waste Discharge Requirements for the Corps' 2026-2029 maintenance dredging program that incorporates strategic placement and other innovative approaches to increase beneficial reuse of dredged sediment.
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.

PRIORITY ACTION	STATUS
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. In addition, began providing technical, planning, and regulatory assistance to the East Bay Crescent Shoreline Planning and Adaptation Project.
Ensure industrial facilities and dischargers near these communities are frequently inspected and in compliance	Inspected industrial facilities to ensure compliance near these communities.
Require sea level rise and groundwater rise vulnerability assessments for cleanup cases in areas most vulnerable to flooding and mobilization of contamination from sea level and groundwater rise	Continued to require vulnerability assessments at cleanup cases most vulnerable to flooding and mobilization of contamination from sea level and groundwater rise. These are required at an appropriate point such as when evaluating remedial action plans, monitoring program changes, during 5-year reviews, and when closure is being considered.

WORKFORCE PLANNING AND DEVELOPMENT

PRIORITY ACTION	STATUS
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 training as well as the focused recruitment committee and ongoing hiring and retention practices.
Create a welcoming and engaging environment through onboarding activities and by providing career and professional development	Continued to promote a welcoming and engaging environment through onboarding activities, staff events, tracking local activities by professional organizations, and formal and informal ways for newer staff to connect with experienced technical staff and managers.

PRIORITY ACTION	STATUS
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 4 days in the office work environment.
Create a shared and collaborative learning organization by staff attending training and presenting and participating in conferences and symposiums	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.

PROGRAM PRIORITIES

PLAN & ASSESS

BASIN PLANNING

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Implement the Climate Change and Wetland Policy Basin Plan Amendment	Assess potential future regulatory Basin Plan Amendment to further address climate change impacts on wetlands		Secured Office of Administrative Law Approval of the Basin Plan Amendment in December 2025. Began implementing an outreach strategy to inform regulated communities by coordinating with the Bay Conservation and Development Commission on a permitting primer, participating in planning efforts with local agencies, such as OneShoreline, and participating in events, such as San Francisco Climate Week. In addition, Regional Water Board staff have begun scoping a regulatory white paper based on lessons learned that will highlight case studies to provide clarity on the Regional Water Board's regulatory process. Staff have also begun scoping a potential regulatory Basin Plan Amendment to revise the dredging implementation procedures in Chapter 4 of the Basin Plan with the goal of increasing beneficial reuse of dredged sediment for wetland restoration.

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Develop Climate Change and Riparian Area Protection Policy	Issue and manage contract with San Francisco Estuary Institute to identify potential climate adaptation measures to protect beneficial uses in the Petaluma River watershed Issue and manage contract to map riparian areas in the San Francisco Bay region	 	Continue to meet regularly with internal and external stakeholders to discuss different aspects of regulatory options to protect riparian and creek beneficial uses. San Francisco Estuary Institute continues to develop management actions for climate resilient riparian systems in the Petaluma River watershed and is planning to draft the synthesis report by the end of 2026. An initial loss of discretionary funding delayed the development of potential adaptation measures in the watershed. However, the contract is in place and is being managed. Collaboration is ongoing and deliverables are being tracked and submitted. The initial loss of discretionary funding also delayed issuing a contract to develop mapping protocols for San Francisco Bay riparian communities. However, we received funds from the Cleanup and Abatement account to move forward and are currently working with State Water Board staff on the contracting.

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Support tools to understand Subsistence Fishing Beneficial Use	Pilot test the newly developed subsistence fishing consumption survey with one community group		The Regional Water Board adopted a Basin Plan Amendment to incorporate State Board Subsistence Fishing Beneficial Use definitions on April 8, 2026. The next steps are to obtain State Water Board, Office of Administrative Law, and U.S. EPA approvals of the Basin Plan amendment. The State Water Board will consider the Basin Plan Amendment on November 3, 2026. With the help of Bay Area Clean Water Agencies (BACWA) funding, the subsistence fishing consumption survey pilot was expanded to include multiple communities and 200 surveys. In addition, U.S. EPA recently selected a San Francisco Estuary Institute grant proposal in partnership with the Regional Water Board to include an additional 1,200 surveys around the San Francisco Bay as well as expanded outreach and collaboration with fishing communities, public education on consumption guidelines, and fish tissue monitoring.

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Develop high-priority TMDLs	Bring San Mateo Bay Beaches TMDL to Board for adoption Issue and manage contract for a Technical Advisory Committee and monitoring to support Lake Merritt low dissolved oxygen TMDL alternative	 	The Advanced Restoration Plan addressing pathogen impairments in San Mateo Bay Beaches was adopted by the Regional Water Board on June 10, 2026. Prepared and published three monitoring reports for Lake Merritt including two Dissolved Oxygen and Nutrient Data Analysis Reports and a 2025 Small-Scale Fish and Shrimp Mortality Report. These reports will help to inform future monitoring activities and recommendations of the Technical Advisory Committee. The Technical Advisory Committee contract has been executed with 205(j) funding from U.S. EPA.

INTEGRATED REPORT AND TOTAL MAXIMUM DAILY LOADS (TMDLs)

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Develop Polychlorinated Biphenyls (PCBs) TMDL revision strategy	Oversee data collection, modeling, and analysis for PCBs TMDL revision		The San Francisco Estuary Institute is on track to complete the Watershed Dynamic Model to simulate hydrology and sediment transport in local tributaries to the San Francisco Bay watershed. Next phase is to add the PCBs component. Regional Monitoring Program PCB Workgroup approved projects for the San Francisco Estuary Institute to collect information and data to provide a science synthesis are ongoing. Integrated modeling and monitoring strategies are ongoing and are on track.
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 pathogen impairment in Tomales Bay was developed and submitted to the State Water Board and U.S. EPA.

SURFACE WATER AMBIENT MONITORING PROGRAM

PROGRAM Priority Action	FY25/26 TARGETS & MILESTONES		STATUS
Monitor in support of the TMDL Program	Support future TMDL projects		Together with the Suisun Resource Conservation District, the Regional Water Board conducted coordinated monitoring of dissolved oxygen in the western region of Suisun Marsh. This information is being used to prepare a report with recommendations on next steps. Collected and analyzed dissolved oxygen and nutrient monitoring data from Lake Merritt to inform the Lake Merritt low dissolved oxygen Advanced Restoration Plan.
Collect Nutrient data to inform the Statewide Biostimulatory Policy	Participate in Statewide biostimulatory policy meetings		Participated in a series of State Water Board Nutrient Summit Meetings and offered written feedback on the statewide policy options and implementation considerations.
Strengthen relationships with underrepresented communities	Continue key monitoring and education outreach with underrepresented communities		Conducted a total of five educational outreach sessions with a community group and a local high school.

WASTEWATER AND FLOOD MANAGEMENT INFRASTRUCTURE RENEWAL

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Ensure climate change resiliency (e.g., related to sea level rise, groundwater rise, and wildfires) in wastewater infrastructure renewal projects	Participate in forums to encourage infrastructure renewal that provides multiple benefits Facilitate infrastructure renewal through other permit-related tasks		Continued to participate in forums to encourage infrastructure renewal that provides multiple benefits. Reviewed contingency plans when inspecting facilities. Coordinated with wastewater agencies to obtain information about sea level rise adaptation plans for inclusion in reissued NPDES permits.
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		Worked with Nutrient Management Strategy stakeholders through the Steering Committee to develop the FY 25/26 workplan. This plan directs the high-priority monitoring, modeling, and special studies to assess the effects of nutrients on San Francisco Bay considering needs that have risen since the 2022 <i>Heterosigma akashiwo</i> bloom that resulted in widespread fish kills. Participated in modeling meetings to articulate model improvements necessary to inform future permit decisions. Wrote letters of support for U.S. EPA grant funding to the Nutrient Management Strategy and wastewater agencies to support nutrient reductions, nutrient trading, and improved monitoring.

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
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		Continued to participate in the Regional Monitoring Program's Emerging Contaminants Workgroup to engage on emerging contaminants such as PFAS, Organophosphate Esters and Tire and vehicle-derived contaminants. Continued to collaborate with the San Francisco Estuary Institute on related externally funded efforts such as the PFAS Sources to Solutions project, which is assessing the impacts of consumer 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. In addition to completing inspections, we took action to address reporting deficiencies at approximately 100 sewer agencies.

REGULATE

WASTEWATER DISCHARGES TO SURFACE WATERS

PROGRAM Priority Action	FY 25/26 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 9 individual permits, 2 general permits, and rescinded the Extracted Groundwater General Permit (12 permits total). As of July 1, 2026, about 20 percent of the NPDES permits were expired. We had significant delays, with all permit reissuances put on hold for a few months in late 2025, due to ongoing litigation related to the use of the Test of Significant Toxicity in NPDES permits.
Inspect major facilities at least every other year and minor facilities at least once every five years	Inspect 28 facilities		33 facilities were inspected.
Support the Nutrient Management Strategy (NMS) and development of dissolved oxygen assessment framework	None Listed		Collaborated with San Francisco Estuary Institute staff to refine the Regional Water Board staff report summarizing the dissolved oxygen assessment framework.

PROGRAM Priority Action	FY 25/26 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	 	Reviewed and requested revisions on BACWA's Nutrient Watershed Permit 2025 Group Annual Report, which includes alternatives analyses for proposed projects and status updates for ongoing projects that municipal wastewater treatment plants are considering or implementing to reduce total inorganic nitrogen loads to San Francisco Bay. Ensuring that progress to date demonstrates that dischargers are complying with the 40% reduction as quickly as possible. Continued to coordinate with Bay Area Restoration Regulatory Integration Team (BRRIT) and external partners to review proposed nature-based multi-benefit solutions to control nutrient discharges, including collaboration with East Bay Dischargers Authority (EBDA), U.S. EPA, and the San Francisco Estuary Partnership (SFEP) on the First Mile horizontal levee project in Hayward and with multiple agencies on the Emeryville Crescent levee project.
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 including reviewing more than 180 monitoring reports; inspected 4 facilities; and issued, modified, or rescinded authorizations to discharge for more than 30 enrollees.

WASTEWATER DISCHARGES TO LAND

PROGRAM Priority Action	FY 25/26 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 11 wineries. Conducted desktop reviews to identify wineries that failed to enroll in the Winery Order. 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		Continued coordination with Marin County, Napa County, Contra Costa County, and Sonoma County. After many years of coordination between staff from the San Francisco Bay Regional Water Board, the North Coast Regional Water Board, and Sonoma County Environmental Health, the Sonoma County Local Agency Management Program was completed and approved by the North Coast Regional Water Board on June 16, 2026.
Manage new and existing waste discharges to land	Transition at least 2 individual Waste Discharge Requirements (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 Inspect 12 facilities and conduct appropriate follow-up actions	 	The transition from individual WDRs to general WDRs is in progress for several facilities. Transitions were not completed due to pending facility information needed and other priorities arising, including reviewing Reports of Waste Discharge for potential new community onsite wastewater systems for proposed housing developments. Inspected 13 permitted WDR facilities and issued inspection reports requiring follow-up actions as appropriate.

MUNICIPAL STORMWATER PROGRAM

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Reduce trash discharges	Report to Board on Permittee attainment of required 100 percent trash load reduction Continue to work with Permittees to address discharges of trash associated with unsheltered homelessness	 	Provided an update on the Municipal Regional Stormwater Permit permittees' attainment of 100 percent trash load reduction at the December 2025 Board meeting. Prepared five Cease and Desist Orders, adopted by the Board, for Permittees that did not achieve 100 percent trash load reduction prior to the June 30, 2025, deadline. Continue to work with these Permittees as they implement their trash control plans. Continue to coordinate with Permittees to respond to reports of trash discharges related to illegal dumping and unsheltered homelessness. In September 2025, participated in a site visit with the City of San Jose to see the City's efforts to address discharges of trash associated with unsheltered homelessness through its Direct Discharge Control Plan. Provided an update to the Board in the October 2025 Executive Officer's Report.
Continue to reduce discharges of pollutants that impair receiving waters, including discharges of PCBs to San Francisco Bay	Review long-term implementation plan and schedule to achieve TMDL Wasteload Allocations		Reviewing Municipal Regional Stormwater Permit Permittees' progress reducing PCB and mercury in stormwater discharges to achieve TMDL Wasteload Allocations. Drafting new permit requirements for the upcoming Municipal Regional Stormwater Permit reissuance.

PROGRAM Priority Action	FY 25/26 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 8,800 acres of right-of-way 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. 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. Provided an informational update at the December 2025 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 25/26, Caltrans reported regional partnership project progress that included 3 newly executed contracts; 1 constructed large trash capture device; 4 advertised large trash capture devices; and continued development discussions with 9 Bay Area municipalities for 14 large trash capture devices. Of note, final contractual discussions are underway with Vallejo Flood & Wastewater District on a \$24 million portfolio of projects that includes a regionally significant multi-benefit Green Stormwater Infrastructure project. The newly executed and active construction projects control trash from 281 acres of Caltrans right-of-way and 4,438 acres of municipal right-of-way.

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
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 Water Board staff		Continued to provide input to State Water Board staff on the Small and Non-Traditional Municipal Stormwater Permit reissuance. Continue to coordinate Permit reissuance with State Water Board staff and Permittees.

INDUSTRIAL AND CONSTRUCTION STORMWATER PROGRAM

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Prioritize cases and coordinate with municipal inspectors to maximize our effectiveness in protecting water quality	Continue to utilize inspection and review prioritization framework and update to include consideration of climate risks as appropriate; update ArcGIS Online Map with best available data as needed		Continued to utilize and update prioritization framework.
	Participate in countywide clean water program trainings and workshops to build and maintain relationships with municipal stormwater inspectors		Participated in countywide clean water program training, including Santa Clara County and Contra Costa 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		Continued to timely review and process requests for changes of information and notices of termination in accordance with processing guidelines.
Support efforts to continuously improve the program	Provide regional input to State Water Board staff for permit reissuance		Completed for FY 25/26. Participated in workgroups for both the industrial general permit and construction general permit reissuance.

CREEK, WETLAND, AND BAY HABITAT PROTECTION PROGRAM

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Review and process applications in a timely and consistent manner	Issue 401 certifications in under 60 days for small projects and under 1 year for large, complex projects		Issued 221 401 certifications and Notices of Applicability. Participated in Bay Area Flood Protection Agencies Association quarterly meetings. Participated in the Cutting the Green Tape Summit attended by staff from the State Water Board, the nine Regional Boards, and the California Department of Fish and Wildlife to improve permitting for restoration projects in California.
Provide support to projects that involve significant climate change risks	Participate in multi-agency meetings to inform the San Francisco Waterfront Resilience Program		Continued to participate in multi-agency meetings to inform the San Francisco Waterfront Resilience Program.
Implement and update existing stream maintenance authorizations for Bay Area flood management agencies	Update programmatic stream maintenance authorizations for Livermore		Reauthorized programmatic stream maintenance for the Sonoma County Water Agency, Contra Costa County Flood Control District, and San Mateo County. Reauthorization for Livermore was put on hold as the City evaluates program need.

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Participate in the Wetland Regional Monitoring Program (WRMP) to improve alignment among regulatory agencies for permit-driven monitoring requirements	Assist the Wetland Regional Monitoring Program with data collection Incorporate Wetland Regional Monitoring Program monitoring into Water Board dredge and fill permits	 	Assisted the Wetland Regional Monitoring Program with collection of data on marsh sedimentation and fish assemblages. Continued to participate in multi-agency meetings and have developed a conceptual proposal to incorporate the Wetland Regional Monitoring Program into permits to meet agency needs while reducing monitoring costs for project proponents. Developing performance criteria and other details to fulfill the regulatory requirements for the permitting agencies.
Participate on the Bay Restoration Regulatory Integration Team (BRRIT) and its associated Policy and Management Committee to facilitate timely issuance of Certifications for Measure AA-funded projects geared toward sea level rise adaptation	Continue to participate in BRRIT to support timely issuance of authorizations for Bay restoration projects		Continued to participate in BRRIT to support timely approvals of Bay restoration projects. 7 projects were fully permitted and 1 project completed construction (Palo Alto Horizontal Levee Pilot Project). Executed grant agreement with the San Francisco Bay Restoration Authority for continued funding of the Board's BRRIT position in April 2026.

DREDGING PROGRAM

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Promote the beneficial reuse of dredged sediment	Issue 401 Certifications for mid-sized and small dredgers		Issued new 401 Certifications and approvals for mid-sized and small dredgers during the fiscal year.

LAND DISPOSAL PROGRAM

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Update landfill and land disposal Waste Discharge Requirements (WDRs) as necessary, including to address PFAS	Issue or update at least 3 Waste Discharge Requirements		Issued 3 Waste Discharge Requirements. No additional PFAS investigations required.
	Require additional PFAS investigations as needed as follow-up to State Board PFAS Order		Continue to ensure compliance with the 13267-order issued in March 2025 requiring 12 closed landfills not covered by the Statewide PFAS landfill order to comply with similar requirements.
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	Work with land disposal sites to ensure acceptable long-term flood protection plans are prepared		Completed. Reviewed and approved last 3 of 27 Long-Term Flood Protection Plans submitted to comply with Order R2-2024-0002, Amending Waste Discharge Requirements for Oceanfront and Bayfront Landfills and Industrial Facilities.
	Require long-term flood protection planning at sites not subject to Waste Discharge Requirements as needed		Like last fiscal year, no additional sites were identified as a priority.

AGRICULTURAL LANDS PROGRAMS

PROGRAM Priority Action	FY 25/26 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 Confined Animal Facilities program for all dairies and other Confined Animal Facilities in impaired watershed via report review, non-filer follow-up, interagency coordination, compliance assistance, and enforcement	 	Completed. Continue to manage confined animal program for all dairies and other Confined Animal Facilities in impaired waters.
Increase inspection presence for all programs	Inspect at least 10 grazing operations and 5 Confined Animal Facilities operations Inspect 1 high-risk outdoor cannabis operation	 	Completed. Inspected one outdoor cannabis operation.
Manage Grazing Waiver	Enroll grazing operations in Petaluma River watershed and west side of Point Reyes National Seashore		Most operations have enrolled; outreach and education are ongoing. Conducted 2 in-person educational workshops.
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	FY 25/26 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. Continuing to process applications.
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		Transitioning City of Palo Alto and South Bay Water Recycling Program to the statewide general order; updating Notice of Applicability for SFPUC water recycling program to include new Treasure Island facility.
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	 	Reviewed target number of annual reports and followed up with facilities as needed. Inspected four recycled water facilities (1 municipal recycled water facility, 1 municipal/industrial recycled water facility, and 2 onsite recycled water facilities).

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Engage in collaborative efforts that promote increases in recycled water in the Region	Continue strategy development / implementation on where to prioritize Water Board recycled water efforts to enable increases in water recycling		Continued to identify opportunities and enable increases in water recycling.
	Engage with recycled water stakeholders to share resources, reduce barriers, and support the broader use of recycled water		Continued to engage with recycled water stakeholders through participation and engagement in WateReuse conferences, workshops, and meetings, and quarterly BACWA Recycled Water Committee meetings.
Identify opportunities to standardize and streamline recycled water permitting	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		Continued coordination with the Division of Drinking Water and SFPUC on the Onsite Use of Nonpotable Water regulations. Rulemaking was completed and regulations are effective as of April 22, 2026.

CLEAN UP

SITE CLEANUP AND UNDERGROUND STORAGE TANK PROGRAMS

PROGRAM Priority Action	FY 25/26 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	Continue case management to prioritize and implement regulatory and enforcement actions to move cases forward		Continued to prioritize and implement regulatory and enforcement actions based on risk, threat, and environmental justice factors to control exposure and migration. Identified and undertook enforcement actions as needed to ensure compliance.
Address potential adverse impacts from sea level rise and groundwater rise	Evaluate the effectiveness of our implementation actions and consider improvements and adjustments Continue tracking cleanup sites (including Underground Storage Tanks) where vulnerability assessments have been required Align with State Water Board cleanup program prioritization recommendations	  	Incorporated the evaluation of vulnerability at critical milestones and at the time of case closure. Continue to evaluate the effectiveness of our actions. Continued to track sites where vulnerability assessments have been required. Continue to coordinate with State Water Board regarding their efforts to update GeoTracker to map potentially vulnerable cleanup sites and track status of vulnerability assessments.

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Update the Environmental Screening Levels (ESLs) to be consistent with the latest science (e.g., toxicity criteria)	Publish the update		Published the update in July 2025. Continue to respond to comments and questions as they arise.

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Apply Environmental Justice lens to inform cleanup priorities	Identify and implement regulatory actions for active cases in environmental justice communities to reduce pollution risks and threats		Continued to prioritize the 102 active cleanup program sites located in environmental justice communities for regulatory action. Required remediation at 7 sites, closed 5 sites, and determined that 4 additional sites are eligible for closure. Continued to push for investigation and mitigation measures to identify and quickly address any exposures at sites located in environmental justice communities.
	Prioritize backlogged (i.e., inactive) cases in environmental justice communities based on risks and threats for regulatory action		Backlogged (i.e., inactive) cases in environmental justice communities have been prioritized for regulatory action based on risks and threats.
	Track regulatory actions for cases in environmental justice communities		Continued to track regulatory actions for cases in environmental justice communities.
	Review our existing guidance for public participation and identify ways to enhance outreach and engagement activities for cleanup sites in environmental justice communities and tribal lands		Completed.
	Keep environmental justice advocates, organizations, and tribes informed about our regulatory actions at cleanup sites in their communities and historical lands		Continued outreach efforts to inform and gain feedback from environmental justice advocates, organizations, and tribes.

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
	Coordinate with the State Water Board, Department of Toxic Substances Control, and U.S. EPA to distribute fact sheets and information about grants and resources available for site investigation and cleanup Implement changes to community engagement based on feedback from community groups and tribal representatives	 	Continued to coordinate with the State Water Board, Department of Toxic Substances Control, and U.S. EPA and keep Water Board Staff informed of current state and federal funding opportunities for brownfield site investigation and cleanup. No changes implemented due to lack of resources.

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Assess and investigate potential PFAS discharges	Prioritize enforcement actions for cleanup sites in violation of State Water Board PFAS Order requirements		Prioritized enforcement actions for cleanup sites in violation of State Water Board PFAS Order requirements.
	Continue to identify and prioritize investigation of suspect PFAS discharge facilities		Analyzed initial data and required additional site investigation from 7 fire stations and fire training facilities that may have discharged PFAS to groundwater. Determined that no further investigation is needed at 6 fire stations.
	Issue investigation orders to fire stations and other suspect facilities in the vicinity of drinking water supply wells where PFAS have been detected		Required investigation at 8 industrial sites that may be potential PFAS sources to known drinking water supply well impacts in the Livermore Valley. Three of the sites were determined as not likely having used or discharged PFAS. Investigation is in progress at 3 sites. Two have not responded and staff are following up.
	Require cleanup to abate ongoing discharges		Required storm drain cleanup actions (e.g., sediment removal) to abate ongoing PFAS discharges. Remedial design for PFAS contaminated soil and groundwater is in progress at a few sites.
	Coordinate actions with the Division of Drinking Water and local water agencies		Continued regular coordination meetings with the Division of Drinking Water, Alameda County Water District, Zone 7 Water Agency, San Jose Water Company, and Valley Water to discuss PFAS-impacted supply wells and investigations of potential source sites.

PROGRAM Priority Action	FY 25/26 TARGETS & MILESTONES		STATUS
Assess, investigate, and cleanup PCBs discharges at upland source sites and creek/Bay sediments and known TMDL hotspots	Evaluate the hydrodynamic connection of potential upland source properties to PCBs impacts in downstream creek and Bay sediments Continue to require investigation and cleanup of upland source properties Consider options to require cleanup of contaminated sediment in creeks and San Francisco Bay where there is evidence of a discharge connection Continue coordinating with state and local agencies to conduct additional source tracing sampling in storm drains, catch basins, and in-Bay sediment Evaluate effectiveness of activities in support of the PCBs TMDL	    	Continued assessing connections between upland cleanup sites and PCBs impacts in downstream sediments, including issuance of investigation directives for 3 sites. Approved work plans for investigation of 2 potential PCBs source properties that were identified through the source property referral process. Continued reviewing investigation data to evaluate the extent of PCBs contamination in Mission and Islais creeks. Met regularly with local agencies under the Municipal Regional Permit to improve the source property identification and investigation process. Reviewing effectiveness of activities and data to inform permit requirements for the upcoming Municipal Regional Stormwater Permit reissuance.

DEPARTMENT OF DEFENSE AND ENERGY PROGRAM

PROGRAM Priority Action	FY 25/26 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 Actively participate in resolving formal disputes to expedite site cleanups		Completed. No formal disputes this year.
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.
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.

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	FY 25/26 TARGET	STATUS
PLAN & ASSESS	TOTAL MAXIMUM DAILY LOAD AND BASIN PLANNING		
	Basin Plan Amendments Adopted	0	1
	Pollutant/Waterbody Combinations Addressed	0	1
	TMDLs Adopted/Reconsidered	0	1
REGULATE	NPDES WASTEWATER		
	Major Individual Facilities Inspected	23	26
	Major Individual Permits Issued or Reissued	9	7
	Minor General Facilities Inspected	2	4
	Minor Individual Facilities Inspected	5	9
	Minor Individual Permits Issued or Reissued	5	2
	WASTE DISCHARGE TO LAND — WASTEWATER		
	Individual Waste Discharge Requirements Updated	0	0
	Waste Discharge to Land Inspections	12	13
	NPDES STORMWATER		
	Stormwater Municipal Inspections	12	15 total; 8 Permittees
	Stormwater Industrial Inspections	120	27
	Stormwater Construction Inspections	125	55
	LAND DISPOSAL		
	Landfill Individual Permits Updated	2	2
	Landfill Facilities Inspections	40	33
	All Other Inspections - Land Disposal	15	13

CATEGORY	PROGRAM Performance Measure	FY 25/26 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	4
	Cleanup Sites Into Active Remediation	15	18
	Department of Defense Sites into Active Remediation	0	0
	Underground Storage Tank Sites Closed	20	26
	Cleanup Sites Closed	25	28
ENFORCEMENT	ENFORCEMENT		
	Respond to serious priority violations with formal enforcement or investigative order within 18 months	80%	See Note 1
	Assess mandatory minimum penalties within 18 months	80%	100%

1. Due to changes in enforcement database practices, performance under this target is under evaluation with support from State Water Board staff.