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

MEETING DATE: October 8, 2025

ITEM: 4

Executive Officer's Report

Executive Officer's Report October 3, 2025

Table of Contents

San Francisco Bay PCB TMDL and Revision Strategy (Setenay Bozkurt Frucht)

In 1998, San Francisco Bay was identified as impaired by polychlorinated biphenyls (PCBs), prompted by a health advisory for fish consumption due to elevated levels of PCBs in sport fish. The San Francisco Bay PCB Total Maximum Daily Load (TMDL) was adopted in 2010 and established a fish tissue concentration target for shiner surfperch and white croaker that would be protective of both human health and wildlife. The fish tissue target for PCBs was set as 10 micrograms per kilogram (µg/kg or parts per billion, ppb). A food-web model translated the fish tissue target to a sediment PCB target of 1 µg/kg. A simple mass-budget model translated this to an allowable annual load of 10 kilograms per year (kg/yr), which is set as the TMDL target.

The TMDL included a program of implementation to reduce PCB loads to the Bay from 34 kg/yr to 10 kg/yr and established a 20-year timeline to do that.

Urban stormwater is the largest pathway of PCB loads to the Bay and requires a 90 percent reduction from 20 kg/yr to 2 kg/yr (Figure 1). Delta inflow, municipal wastewater, and industrial discharges are other external sources of PCBs (Figure 1). Due to large historical releases of PCBs to the Bay, there are internal sources in the Bay. The TMDL included an order-of-magnitude estimate of the in-Bay PCB reservoir as potentially up to 4,900 kg, which contributes an ongoing supply of PCBs to the water and biota through continual mixing of bottom sediments from wave action and mixing by organisms on the active layer.

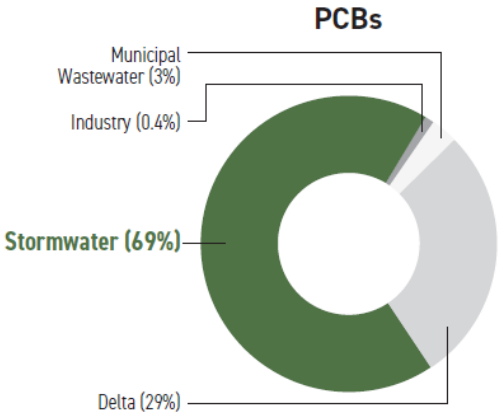

Figure 1: Percentage Contribution of PCBs by Source (Pulse of the Bay, 2019, SFEI)

These high PCB concentrations in sediment are not evenly distributed around the Bay. The average PCB concentration ranges from 5 to 12 µg/kg in different parts of the Bay but contaminated sites can have PCB concentrations of thousands of µg/kg. Contaminated sites are usually located near-shore close to potential sources.

More than 40 years after the ban on PCBs and 15 years after the adoption of the TMDL implementation program, PCB concentrations in shiner surfperch and white croaker show limited signs of decline. In 2019, shiner surfperch had a Bay-wide average PCB concentration of 220 ppb, more than 20 times higher than the TMDL target (Figure 2).

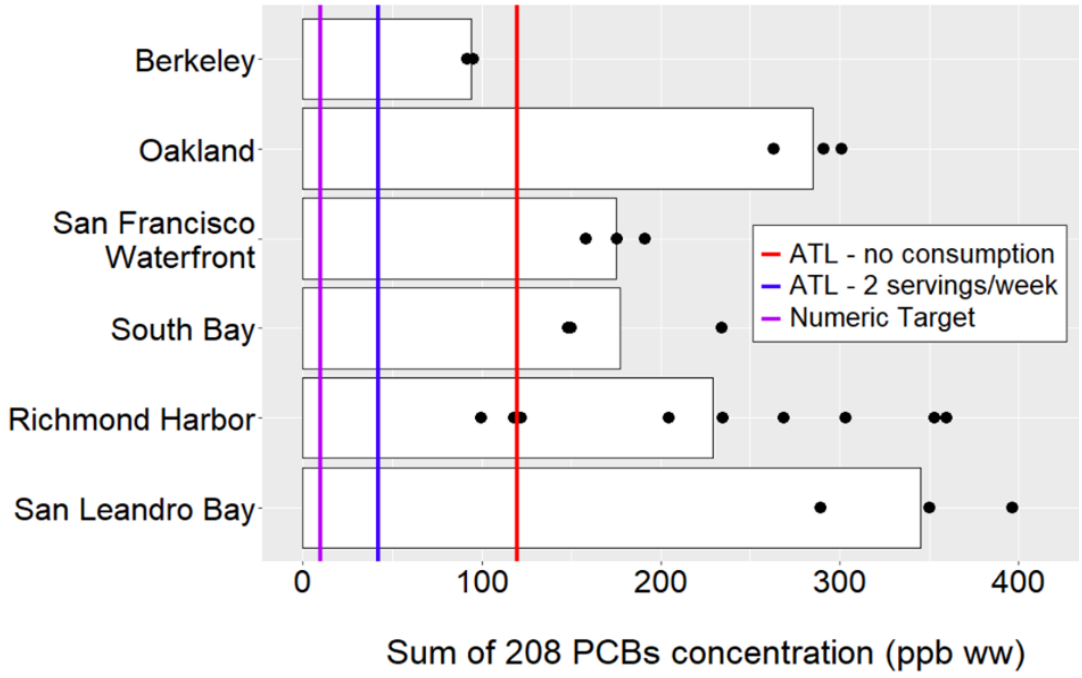

Figure 2: Concentrations of PCBs in Shiner Perch by Location in 2019

A decade ago, the San Francisco Bay Regional Monitoring Program (RMP) PCB Workgroup developed conceptual models for margin units downstream of four pilot watersheds with high PCB concentrations. These are known as the Priority Margin Units and include Emeryville Crescent, San Leandro Bay, Steinberger Slough, and Richmond Harbor. The conceptual models shifted our focus from the open Bay to these contaminated areas around the margins where impairment is greatest, where load reductions are being pursued and can be tracked, and where we can make a difference in the Bay's recovery. While the Bay-wide scale of load reductions hasn't been substantial enough and recovery has been slow, we now know that we will be able to move the needle on PCB recovery by focusing on reducing loads in priority areas.

As the end of the TMDL implementation timeline is approaching, we developed our strategy for the TMDL Revision based on this new information. Accordingly, the TMDL Revision will primarily focus on the implementation program in Priority Margin Units to accelerate the recovery of the Bay and will keep numeric targets and allocations intact.

Information and modeling needs for the TMDL Revision will be provided by the San Francisco Estuary Institute (SFEI) in collaboration with the RMP PCB Workgroup and Bay Area Municipal Stormwater Collaborative (BAMSC). In the next three years, SFEI scientists will synthesize all available PCB data and information generated since the TMDL, including the most recent fish concentration surveys done in 2024 and surface sediment concentrations collected in 2023. SFEI's work will also include completing the conceptual models for all priority margin units and modeling updated loads from the Bay's tributary watersheds, and modeling recovery trajectories for the Bay, as well as the priority margin units. These analyses will provide the justification to extend the

timeline of implementation and will set the parameters for the revised implementation program.

The TMDL Revision is being advanced through strong collaboration among Water Board staff, BAMSC, SFEI and the RMP PCB Workgroup. We meet quarterly with BAMSC to discuss the Municipal Stormwater Permit's PCB-related activities and the TMDL Revision updates. In addition, the RMP Small Tributaries Loading Strategy and PCB workgroups bring scientists, regulators, and the county clean water programs together to coordinate on RMP projects, stormwater monitoring, and the TMDL Revision. We are working with all stakeholders to conduct joint fact finding to collaboratively establish the foundation for the next implementation program.

No Further Groundwater Remediation, Univar Chemcentral, Hayward (Helen Hild)

San Francisco Bay Regional Water Board staff have recently concurred that no further active remediation is needed for the groundwater plume associated with the former Chemcentral Facility in Hayward (Property).

The Chemcentral Facility operated from 1965 to 2009 and consisted of a tank farm area with 37 underground storage tanks containing various chemicals, fuels, and industrial-grade solvents, and a dispenser island. Environmental investigations at the Property began in 1989. In coordination with Alameda County Water District, the Regional Water Board has overseen the cleanup of the former Chemcentral Facility since 1995.

Environmental investigations have identified subsurface impacts to soil, soil vapor, and groundwater as the result of historical chemical handling at the former facility. These impacts include petroleum hydrocarbons; volatile organic compounds, including benzene, toluene, ethylbenzene, and xylenes; tetrachloroethene and its breakdown products; and ketones. In 2000, the Regional Water Board adopted a Final Site Cleanup Requirements Order (Order No. 00-032), which required the installation and operation of a treatment system to remove contamination in soil vapor and groundwater.

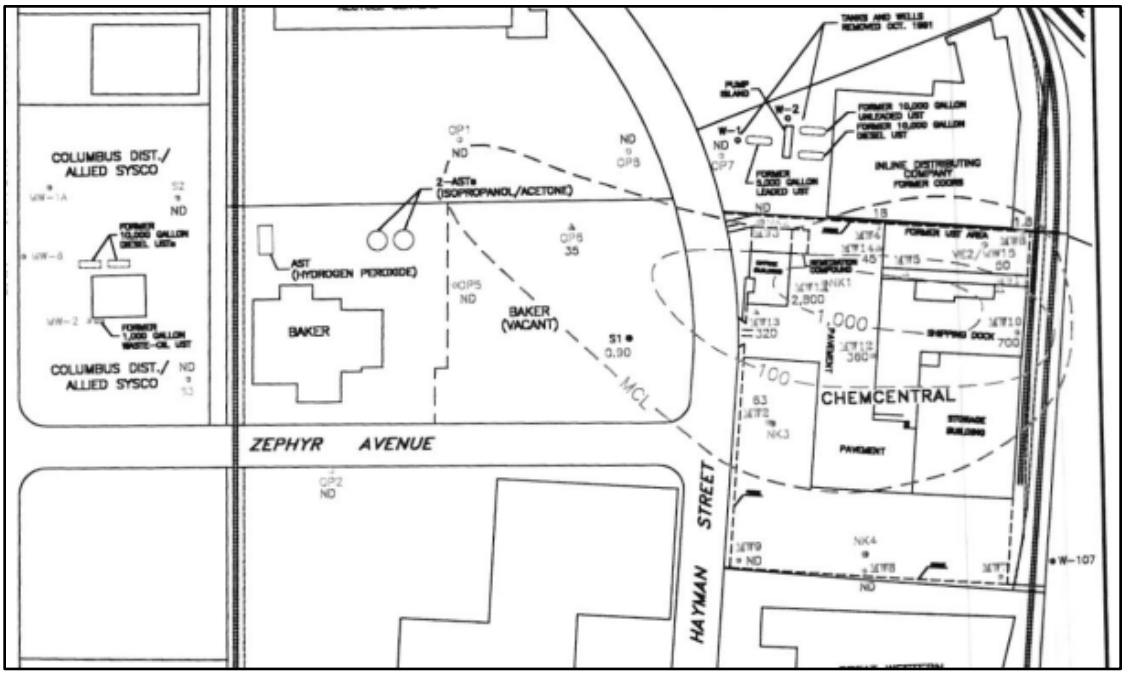

Figure 1: Historical Vinyl Chloride Plume

We approved the curtailment of the remediation system in 2016 following a demonstration that the system no longer effectively removes contamination. At the time of system curtailment, the remediation system had removed approximately 11,550 pounds of volatile organic compounds. The semiannual groundwater monitoring that has been conducted since remedial system curtailment has not shown a rebound of volatile organic compounds in groundwater or soil vapor.

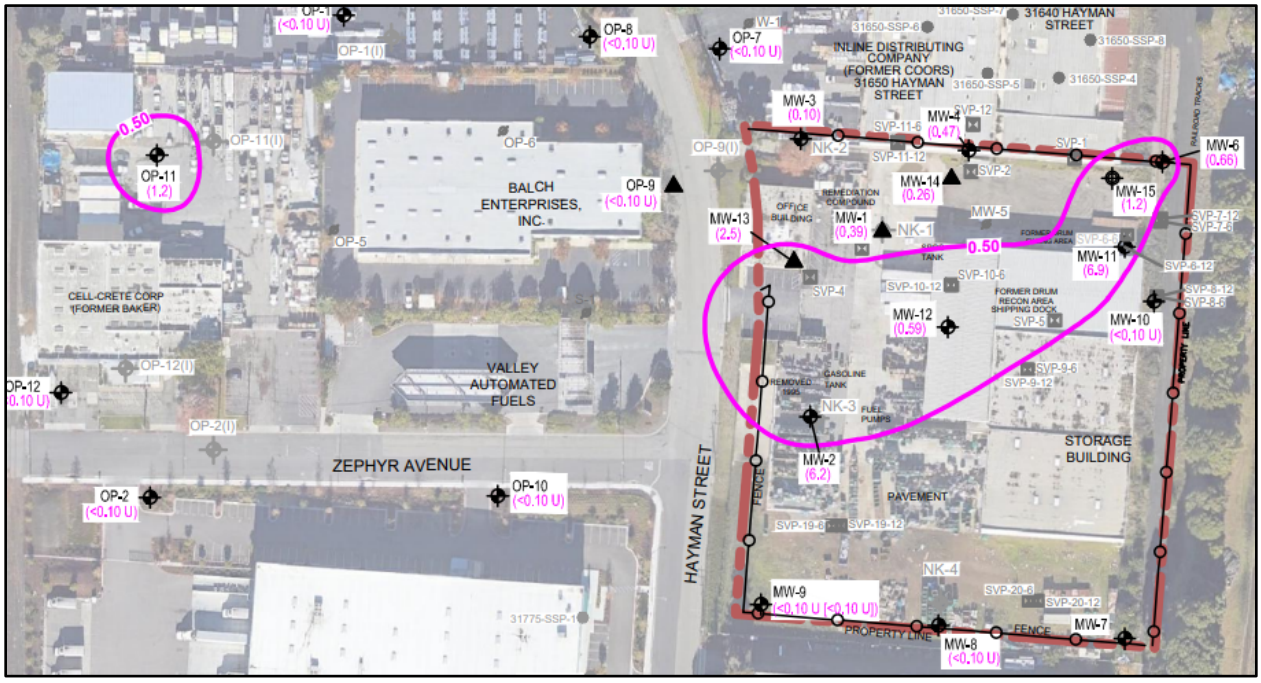

Figure 2: Current Vinyl Chloride Plume

Figure 2 above shows the current vinyl chloride groundwater plume that exceeds the maximum contaminant level of 0.5 micrograms per liter. Historical maximum concentrations exceeded 2,000 micrograms per liter.

Regional Water Board staff are currently working with the responsible party to revise the self-monitoring program in Order No. 00-032 to reduce the groundwater sampling frequency from semiannual to annual, and to include annual soil vapor sampling. The responsible party is evaluating a remediation alternative to reduce residual soil vapor contamination.

San José Site Visit and Direct Discharge Control Plan Update (Eileen M. White, Keith Lichten and Rebecca Nordenholt)

On September 18, 2025, San Francisco Bay Water Board staff joined representatives from the City of San José (San José) for a field visit and progress update on San José's substantial work to address unsheltered homelessness in the city, including their Direct Discharge Control Plan to control trash.

Background

The Municipal Regional Stormwater NPDES Permit (Order No. R2-2022-0018, as amended) (MRP) requires Permittees to reduce discharges of trash to receiving waters from municipal storm drain systems. In addition, the Board recognized the potential for adverse water quality impacts due to discharges of trash and human waste from homeless encampments when it adopted Resolution No. R2-2015-0024: *Action to Address the Adverse Water Quality Impacts of Homeless Encampments*, and the Board included in the MRP Provision C.17, setting expectations for MRP Permittees, including San José, to implement actions to address discharges of pollutants associated with unsheltered homelessness.

The MRP, reissued by the Board on May 11, 2022, required Permittees to reduce trash discharges by 100 percent from 2009 levels by June 30, 2025. The MRP recognized that homeless encampments and unauthorized dumping are significant sources of trash in waterways. Therefore, it gave Permittees the option to develop Direct Discharge Control Plans to control direct discharge of trash into creeks. Permittees, including San José, that are controlling direct discharges of trash to creeks and the Bay under an approved Direct Discharge Control Plan, are allowed an additional six months, until December 31, 2025, to achieve the 100 percent reduction requirement. The MRP outlines expectations for Direct Trash Discharge Controls, including addressing significant discharges from populations experiencing unsheltered homelessness. By implementing its plan, San José is also meeting MRP Provision C.17 expectations. As part of its Direct Discharge Control Plan, San José updates Water Board staff on its progress implementing the plans every six months. As part of its latest update, San José invited us to a field visit, so we could see firsthand the progress they have made in implementing a human-centered approach to addressing unsheltered homelessness and controlling trash.

September 18, 2025, Site Visit

The field visit consisted of a tour of an interim supportive housing community; presentations by city leaders, including Mayor Matt Mahan, showcasing the collaboration and extensive resources San José is committing to address unsheltered homelessness and trash; and a tour of the Coyote Creek and Guadalupe River waterways where San José is controlling trash. Joining San Francisco Bay Water Board Executive Officer Eileen White were Watershed Division Manager Keith Lichten; Senior Environmental Scientist Rebecca Nordenholt; and Water Resource Control Engineer Imtiaz-Ali Kalyan. The field visit gave us an in-person window beyond San José's reporting to the Water Board and provided an excellent opportunity to see firsthand how San José is implementing its Direct Discharge Control Plan with a human-centered approach to manage and end unsheltered homelessness.

The site visit began with a tour of the interim supportive housing community at Cherry Avenue (Cherry Avenue), which is currently under construction and scheduled to open later this year. Representatives from the Santa Clara Valley Water District (Valley Water) joined us for the tour because Cherry Avenue is a collaborative agreement between San José and Valley Water – Valley Water owns the site and is leasing the Cherry Avenue site to San José at no cost. Homeless encampments along the Guadalupe River immediately behind Cherry Avenue have been cleared and the residents of the former encampments were offered temporary housing offsite. Once it opens, residents of the former encampments will be given priority at Cherry Avenue, which will house over 130 people and offer supportive services.

Figure 3: Water Board, Valley Water, and San José staff at the Cherry Avenue tour. Photo credit Jennie Loft.

The Cherry Avenue tour was followed by a presentation at City Hall. The presentation provided an overview of San José's work to manage and end homelessness. Presenters included Mayor Matt Mahan; Jeff Provenzano, Director, Environmental Services; Cupid Alexander, Deputy Director, Housing; Erik Solivan, Director, Housing; Rick Scott, Assistant Director, Transportation; Jon Cicirelli, Director, Parks, Recreation and Neighborhood Services; and Police Chief Paul Joseph.

San José has adopted a One Team approach, which involves significant collaboration across departments, to control trash to improve water quality and to compassionately address the complex issue of unsheltered homelessness. They have a five-step approach to manage and end homelessness and protect water quality: engage, shelter, clear, preserve, and restore. To engage, San José uses a human-centered approach to prevent, support, and manage homelessness. San José collaborates with outreach partners to identify encampments within 500 feet of waterways across 26 miles in their Direct Discharge Area. It connects people experiencing homelessness with support services including temporary housing, laundry and shower services, porta-potties and handwashing stations, and social services case managers. The "shelter" component of the model includes building a robust network of housing solutions: San José is increasing the supply of interim housing and safe parking to get people indoors while also working towards permanent housing solutions. The "clear" component of the model includes a variety of measures to clear encampments and pick up trash, such as parking enforcement programs; encampment cleanups, abatements, and weekly trash collection; and RV bio-waste and trash removal programs. The "preserve" component prevents encampments from re-establishing in areas that have been cleaned up. San José has designated "no encampment zones" along waterways, which help preserve public spaces for community use and environmental protection. San José has also amended its municipal codes to support enforcement efforts, when needed. The "restore" component involves partnering with public and private entities to prevent trash and debris from entering waterways.

The presentation was followed by a tour of reaches of Coyote Creek and Guadalupe Creek to highlight San José's progress in implementing its Direct Discharge Control Plan. The tour included representatives from San José's Parks, Recreation and Neighborhood Services; Housing; Public Works; Environmental Services; and Police departments. On the tour, we visited several of the no encampment zones that we learned about during the presentation and heard more about how San José works to clear and maintain the waterways. The tour highlighted factors San José uses to prioritize areas for encampment abatement, such as their proximity to waterways, schools, parks, and community centers. We also met with San José's partners from Homefirst at the Taylor Street Navigation Hub, which is a new emergency housing site that offers shelter and services until interim housing at a facility such as Cherry Avenue or permanent housing are available. Throughout the tour, we observed a remarkable improvement in the condition of the waterways relative to previous site inspections.

Figure 4: Water Board and San Jose staff visiting a no encampment zone along Guadalupe River. Photo credit Jennie Loft.

Conclusion

The September 18 field visit was an excellent opportunity to observe San José's work to control the direct discharge of trash into creeks. San José is leading the way through its extensive internal efforts and public and private partnerships to address the complex issue of unsheltered homelessness. San José is implementing a range of measures through a thoughtful, data-driven approach, and the associated reduction in trash in creeks as compared to previous years is significant. We appreciate San José's commitment to protecting water quality and will continue our work with them on this challenging set of issues.

Staff Presentations (Nicole Fry)

In July 2025, Nicole Fry, Research Scientist III in the Toxics Cleanup Division, and Angus Chan, Senior Water Resource Control Engineer in the Groundwater Protection Division, updated our Environmental Screening Levels (ESLs) that are used to evaluate common contaminants at cleanup program sites. At the request of cleanup program staff from other Regional Water Boards, Nicole and Angus presented an overview of the recent update and how to use the ESLs to staff from Region 5 (Fresno) on September 3 and from Region 8 (Riverside) on September 17. There were about 20 staff at each meeting. The presentations were well received.

Staff Updates (Eileen M. White)

Alex Snyder joined the Planning Division as an Engineering Geologist. He received a Bachelor of Science in Geology from UC Davis and a Master of Science in Coastal and Watershed Science and Policy from California State University, Monterey Bay. While in graduate school, Alex used high resolution topographic mapping techniques to monitor a beach nourishment project that utilized harbor dredge material in Monterey, CA. Alex joins us from the USGS Pacific Coastal and Marine Science Center, where he studied shoreline change and coastal processes in California and Alaska, partnering with researchers, policy makers, and local stakeholders to collect field data and develop meaningful analyses and data products. In his current role, he will be working to identify policy and guidance revisions that will incentivize the beneficial reuse of sediment to conserve and restore resilient baylands. When he is not working, Alex spends his time hiking with his dogs, exploring the world with his 2-year-old, and trying to see live music on occasion.

Enforcement Actions (Brian Thompson and James Parrish)

On behalf of the Board, the Executive Officer approved the following settlement:

Discharger	Violation(s)	Imposed Penalty	Supplemental Environmental Project
Samira and Saeed Amidhozour	Failure to have permit coverage	$167,200	-

401 Water Quality Certification Applications Received (Elizabeth Morrison)

The table below lists those applications received for Clean Water Act section 401 water quality certification from August 14 through September 10, 2025. A check mark in the right-hand column indicates a project with work that may be in the San Francisco Bay Conservation and Development Commission (BCDC) jurisdiction.

Project Name	City/Location	County	May have BCDC Jurisdiction
Point Eden U-Haul Development Project	Hayward	Alameda	X
Arroyo Las Positas Flood Hazard Mitigation Project	Livermore	Alameda	
Jack London Square Webster Street Outfall Pipe Replacement	Oakland	Alameda	X
Jack London Square Emergency Pile Repair	Oakland	Alameda	X
F12c00 Elmhurst Creek (Zone 12, Line M) Restoration From Baldwin Street To Union Pacific Railroad	Oakland	Alameda	
Gold Creek Erosion Repair	Pleasanton	Alameda	
SFPP Alameda Creek Riprap Removal And Restoration Project	Sunol	Alameda	
StopWaste Pond WM-3 Restoration	Unincorporated	Alameda	
StopWaste Pond WM-4 Restoration	Unincorporated	Alameda	
Copper Moon Upper Pond Restoration	Unincorporated	Alameda	
Lake A Arroyo Del Valle Bank Restoration Project	Unincorporated	Alameda	
Power the South Bay Project	Multiple	Alameda, Santa Clara	X

Project Name	City/Location	County	May have BCDC Jurisdiction
Port Chicago Highway Storm Drain Pipe and Sinkhole Repair Project	Bay Point	Contra Costa	
Facilities and Harbor repair and maintenance	Belvedere	Marin	X
EA 2AA30 Repair Retaining Wall on Marin 1, post miles 6.1-6.3 in Marin County Project	Corte Madera	Marin	
Wavecrest Coastal Trail Phase 2 Project	Half Moon Bay	San Mateo	
Corte Madera Creek and Unnamed Drainage Ditch Vegetation Maintenance Project	Unincorporated	San Mateo	
Glencrag Way Culvert	Woodside	San Mateo	
35543147 Jameson 1105 OH Pole Replacement Cordelia Rd Fairfield Project	Fairfield	Solano	
Sonoma County 2025 Pavement Preservation Program Project	Multiple	Sonoma	
Vulcan Landing Way Pier Dredging and Maintenance	Petaluma	Sonoma	
Kenwood-BPSC Hunt Club LLC – Sears Point Road	Unincorporated	Sonoma	
State Route 37-121 Intersection and Tolay Creek Bridge Replacement Project (EA 1Q76U)	Unincorporated	Sonoma	