

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

**PROSECUTION TEAM STAFF SUMMARY
REPORT: Imtiaz-Ali Kalyan
MEETING DATE: December 10, 2025**

ITEM: 7C

**City of Richmond, Municipal Regional Stormwater Permit Permittee, Richmond, Contra
Costa County – Adoption of Cease and Desist Order**

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CHRONOLOGY: May 11, 2022 – Permit reissued
September 30, 2025 – Fiscal Year 2024-25 Permit Annual Report received

DISCUSSION

This Staff Summary Report has been prepared by the Water Board Prosecution Team.

The Water Board adopted the Municipal Regional NPDES Stormwater Permit, Order No. R2-2022-0018 on May 11, 2022, and amended the permit with Order No. R2-2023-0019 on October 11, 2023, issuing waste discharge requirements as NPDES Permit No. CAS612008 (Permit). The Permit contains prohibitions, limitations, and provisions regulating the stormwater and non-stormwater discharges from the permittees' municipal separate storm sewer systems (MS4). Permit Provision C.10.a.i required permittees to achieve a 100 percent trash load reduction, from a 2009 baseline, by June 30, 2025.

In its Annual Report for Fiscal Year 2024-2025 (Annual Report), the City of Richmond (Permittee) reported a cumulative trash load reduction of 66 percent via full trash capture and equivalent measures. The Permittee did not achieve the 100 percent trash load reduction requirement and is therefore in violation of the Permit. In compliance with Permit Provision C.10.g.viii, the Permittee submitted an updated Trash Load Reduction Plan describing how it will return to compliance with the Permit's trash control requirements and has worked with Water Board staff to clarify and update the submitted Plan.

The Tentative Cease and Desist Order (Order) (Appendix A) would establish requirements and next steps to bring the Permittee into compliance with the 100 percent trash load reduction requirement by June 30, 2030. Consistent with their submitted Trash Load Reduction Plan, and consistent with Permit requirements, the Permittee intends to control the remaining 34 percent of trash generation area via street sweeping and cleanup measures verified by on-land visual trash assessments (OVTAs), and the installation of full trash capture devices.

The Permittee intends to control 28 percent of the remaining area to a low level via a combination of street sweeping and cleanup measures. A 10 percent reduction is anticipated via trash control on private land drainage areas (PLDAs) by December 2025. An 18 percent trash reduction is anticipated from street sweeping and trash cleanup measures verified by OVTAs.

The Permittee intends to control the remaining six percent uncontrolled area to a low level through the installation of full trash capture devices, as follows. The Permittee is working with Caltrans on a Cooperative Initiative Agreement (CIA) funding opportunity for the potential installation of three large full trash capture devices that will treat both the Permittee's and Caltrans' right-of-way. Engineering feasibility, cost estimates, and site scoping occurred in the fall of 2025. Once installed, the three large full trash capture devices will treat moderate and high trash generation areas and contribute an additional two percent to the Permittee's cumulative area treated to a low trash generation level. In addition, the Permittee anticipates an additional 4 percent trash load reduction from restoring a large full trash capture device that was vandalized and rendered inoperable.

While working toward completing the trash control projects described above, the Permittee will implement creek and shoreline cleanup measures and/or control directly discharged trash sufficient to offset the remaining uncontrolled trash generation area.

The Prosecution Team shared a draft Order with the Permittee and incorporated comments prior to circulating the Order for public comment. The Prosecution Team then circulated the Order for a comment period ending November 6, 2025. One comment letter was received from Baykeeper. Response to comments are included in Appendix B; no revisions were made to the Order based on these comments.

APPENDIX

A: Tentative Cease and Desist Order

B: Prosecution Team Response to Written Comments

Appendix A

Tentative Cease and Desist Order

Appendix B

Prosecution Team Response to Written Comments