

**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: 7E

**City of Vallejo and Vallejo Flood and Wastewater District, Municipal Regional Stormwater
Permit Permittees, Vallejo, Solano 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

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 Vallejo and Vallejo Flood and Waste Water District (Permittees) reported a cumulative trash load reduction of 86 percent via full trash capture and equivalent measures. The Permittees did not achieve the 100 percent trash load reduction requirement and are therefore in violation of the Permit. In compliance with Permit Provision C.10.g.viii, the Permittees submitted an updated Trash Load Reduction Plan describing how they 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 Permittees into compliance with the 100 percent trash load reduction requirement by December 31, 2028. Consistent with their submitted Trash Load Reduction Plan, and consistent with Permit requirements, the Permittees intend to control the remaining 14 percent of trash generation area via cooperative projects with Caltrans to install full trash capture devices and a Private Land Drainage Area (PLDA) trash control program. In addition, the Permittees are reevaluating their trash generation maps to inform future trash control measure implementation.

The Permittees have identified 3 promising locations for the potential installation of large full trash capture devices that would generate an estimated trash load reduction benefit of 6 percent and treat approximately 1,243 acres of the Permittees' and Caltrans' right-of-way. Caltrans is evaluating these locations to determine if their right-of-way would be addressed by one or more of these devices. If Caltrans determines that one or more of these devices would be beneficial to addressing trash on their right-of-way and there is funding available to fully support the

design, fabrication, and construction of these systems, then the Vallejo Flood and Wastewater District (District) will further evaluate the feasibility of constructing one or more of these devices.

The Permittees have developed and are implementing a PLDA trash control program where owners of PLDAs receive and are required to complete a self-certification questionnaire and return it to the District. The Permittees anticipate that the results from the questionnaire, and follow-up inspections and enforcement action, where necessary, will likely contribute an additional 6 percent trash load reduction to the overall area treated to a low trash generation level.

The Permittees are also planning to conduct a reevaluation of trash generation in the City of Vallejo (City) to more comprehensively evaluate current trash generation levels in areas identified on the Permittees' baseline maps as moderate, high or very high trash generating areas and not controlled by full trash capture systems or the planned trash control program for PLDAs. The reevaluation will provide a more refined and comprehensive assessment of current trash generation in the City and inform future trash control measure implementation needed to achieve the 100 percent reduction requirement. The City's baseline trash generation map and/or trash load reduction calculations will be updated to reflect the reevaluation's findings.

While working toward completing the trash control projects described above, the Permittees 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 Permittees 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. Two comment letters were received. The Permittees' comment primarily focused on the challenges they face as a low-income community and acknowledged their appreciation for the Board's willingness to work with them as they evaluate the effectiveness of their trash control measures including non-traditional methods. Response to comments are available in Appendix B; no revisions were made to the Order in response to 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