

Long-Term Trash Load Reduction Plan and Assessment Strategy

Submitted by:



**The Town of Los Gatos
110 East Main Street
Los Gatos, CA 95030**

In compliance with Provisions C.10.c of Order R2-2009-0074

February 1, 2014

ACKNOWLEDGEMENTS

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**Town of Los Gatos
LONG-TERM TRASH LOAD REDUCTION PLAN AND
ASSESSMENT STRATEGY**

CERTIFICATION STATEMENT

"I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signature by Duly Authorized Representative:

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Director of Parks and Public Works

February 1, 2014

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PREFACE

This Long-Term Trash Load Reduction Plan and Assessment Strategy (Long-Term Plan) is submitted in compliance with provision C.10.c of the Municipal Regional Stormwater NPDES Permit (MRP) for Phase I communities in the San Francisco Bay (Order R2-2009-0074). The Long-Term Plan was developed using a regionally consistent outline and guidance developed by the Bay Area Stormwater Management Agencies Association (BASMAA) and reviewed by San Francisco Bay Regional Water Quality Control Board staff. The Long-Term Plan is consistent with the Long-Term Trash Load Reduction Framework developed in collaboration with Water Board staff. Its content is based on the Town of Los Gatos' current understanding of trash problems within its jurisdiction and the effectiveness of control measures designed to reduce trash impacts associated with Municipal Separate Storm Sewer (MS4) discharges. This Long-Term Plan is intended to be iterative and may be modified in the future based on information gained through the implementation of trash control measures. The Town of Los Gatos therefore reserves the right to revise or amend this Long-Term Plan at its discretion. If significant revisions or amendments are made by the Town, a revised Long-Term Plan will be submitted to the Water Board through the Town's annual reporting process.

ABBREVIATIONS

BASMAA	Bay Area Stormwater Management Agencies Association
BID	Business Improvement District
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CASQA	California Stormwater Quality Association
CDS	Continuous Deflection Separator
CEQA	California Environmental Quality Act
CY	Cubic Yards
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
ERP	Enforcement Response Plan
FCD	Full [Trash] Capture Device
GIS	Geographic Information System
IDDE	Illicit Discharge Detection & Elimination Program
JPA	Joint Powers Authority
MRP	Municipal Regional Stormwater NPDES Permit
MS4	Municipal Separate Storm Sewer System
NGO	Non-Governmental Organization
NPDES	National Pollutant Discharge Elimination System
Q	Flow
SCVURPPP	Santa Clara Valley Urban Runoff Pollution Prevention Program
SFRWQCB	San Francisco Regional Water Quality Control Board
STTP	Short Term Trash Load Reduction Plan
SWRCB	State Water Resource Control Board
TMA	Trash Management Area
TMDL	Total Maximum Daily Load
USEPA	United States Environmental Protection Agency
Water Board	San Francisco Regional Water Quality Control Board
WDR	Waste Discharge Requirements
WVCWP	West Valley Clean Water Program
ZLI	Zero Litter Initiative

1.0 INTRODUCTION

1.1 Purpose of Long-Term Trash Reduction Plan

The Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit for Phase I communities in the San Francisco Bay (Order R2-2009-0074), also known as the Municipal Regional Permit (MRP), became effective on December 1, 2009. The MRP applies to 76 large, medium, and small municipalities (cities, towns, and counties) and flood control agencies in the San Francisco Bay Region, collectively referred to as Permittees. Provision C.10.c of the MRP requires Permittees to submit a *Long-Term Trash Load Reduction Plan* (Long-Term Plan) by February 1, 2014. Long-Term Plans must describe control measures that are currently being implemented, including the level of implementation, and additional control measures that will be implemented and/or increased level of implementation designed to attain a 70% trash load reduction by July 1, 2017, and 100% (i.e., “No Visual Impact”) by July 1, 2022.

This Long-Term Plan is submitted by the Town of Los Gatos in compliance with MRP provision C.10.c. Consistent with provision C.10 requirements, the goal of the Long-Term Plan is to address trash problems in receiving waters by reducing the impacts associated with trash in discharges from the Town of Los Gatos’ municipal separate storm sewer system (MS4) that are regulated by NPDES Permit requirements. The Long-Term Plan includes:

1. Descriptions of the current level of implementation of trash control measures, and the type and extent to which new or enhanced control measures will be implemented to achieve a target of 100% (i.e. “No Visual Impact”) trash reduction from MS4s by July 1, 2022, with an interim milestone of 70% reduction by July 1, 2017;
2. A description of the *Trash Assessment Strategy* that will be used to assess progress towards trash reduction targets achieved as a result of control measure implementation; and,
3. Time schedules for implementing control measures and the assessment strategy.

The Long-Term Plan was developed using a regionally consistent outline and guidance developed by the Bay Area Stormwater Management Agencies Association (BASMAA) and reviewed by the San Francisco Bay Regional Water Quality Control Board (Water Board) staff. The Long-Term Plan is consistent with the Long-Term Trash Load Reduction Framework (see section 1.2.1) developed in collaboration with Water Board staff. Its content is based on the Town of Los Gatos’ current understanding of trash problems within its jurisdiction and the effectiveness of control measures designed to reduce trash impacts associated with Municipal Separate Storm Sewer (MS4) discharges. The Long-Term Plan builds upon trash control measures implemented by the Town prior to the adoption of the MRP and during the implementation of the Short-Term Trash Load Reduction Plan submitted to the Water Board on February 1, 2012.

1.2 Background

1.2.1 Long-Term Trash Load Reduction Plan Framework

A workgroup of MRP Permittees, including the Town of Los Gatos’ stormwater program representative West Valley Clean Water Program (WVCWP) staff, Bay Area countywide stormwater program staff, and Water Board staff met between October 2012 and March 2013 to

better define the process for developing and implementing Long-Term Plans, methods for assessing progress toward reduction goals, and tracking and reporting requirements associated with provision C.10. Through these discussions, the workgroup created an eight-step framework for developing and implementing Long-Term Plans (Figure 1).

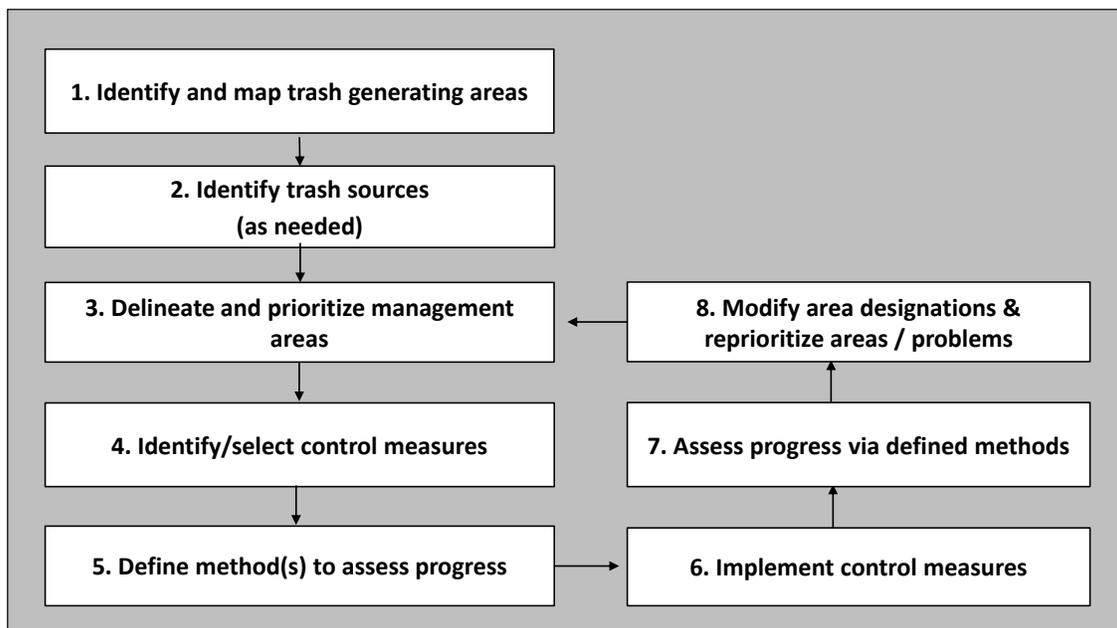


Figure 1. Eight-step framework for developing, implementing, and refining Long-Term Trash Reduction Plans.

The workgroup agreed that as the first step in the framework, Permittees would identify trash generating areas in four categories or levels: very high, high, moderate, and low, within their jurisdictional areas. Trash generation rates developed through the *BASMAA Baseline Trash Generation Rates Project* (see section 1.2.2) served as a starting point for differentiating and delineating land areas with varying levels of trash generation. Permittees then utilize local knowledge and field and/or desktop assessments to confirm or refine the level of trash generation for specific areas within their jurisdiction. Each Permittee then develops a map depicting the location and trash generation category of all sites within their jurisdiction.

As a next step, Permittees delineate and prioritize Trash Management Areas (TMAs) where specific control measures exist or are planned for implementation. These TMAs are intended to serve as reporting units in the future. Reporting at the management area level provides the level of detail necessary to demonstrate implementation and progress towards trash reduction targets.

Once control measures are selected and implemented, Permittees will evaluate progress toward trash reduction targets using outcome-based assessment methods. As the results of the progress assessments become available, Permittees may choose to reprioritize trash management areas and associated control measures designed to improve trash reduction within their jurisdictions.

1.2.2 BASMAA Generation Rates Project

Through approval of a BASMAA regional project in 2010, Permittees agreed to work collaboratively to develop a regionally consistent method to establish trash generation rates within their jurisdictions. The project, also known as the *BASMAA Trash Generation Rates Project* (Generation Rates Project) assisted Permittees in establishing the rates of trash generation and identifying very high, high, moderate and low trash generating areas.

The term “trash generation” refers to the rate at which trash is produced or generated onto the surface of the watershed and is therefore potentially subject to transport via MS4s to receiving waters. Generation rates do not explicitly take into account existing control measures that intercept trash prior to transport. Generation rates are expressed as trash volume/acre/year and were established via the Generation Rates Project.

In contrast to trash generation, the term “trash loading” refers to the rate at which trash from MS4s enters receiving waters. Trash loading rates are also expressed as trash volume/acre/year and are equal to or less than trash generation rates because they account for the effects of control measures that intercept trash generated in an area before it is discharged to a receiving water. Trash loading rates are specific to particular areas because they are dependent upon the effectiveness of control measures implemented within an area. Figure 2 illustrates the difference between trash generation and loading.



Figure 2. Conceptual model of trash generation, interception and load.

Trash generation rates are estimated based on factors that significantly affect trash generation (i.e., land use and income). The method used to establish trash generation rates for each Permittee builds off “lessons learned” from previous trash loading studies conducted in urban areas (Allison and Chiew 1995; Allison et al. 1998; Armitage et al. 1998; Armitage and Rooseboom 2000; Lippner et al. 2001; Armitage 2003; Kim et al. 2004; County of Los Angeles 2002, 2004a, 2004b; Armitage 2007). The method is based on a conceptual model developed as an outgrowth of these studies (BASMAA 2011b).

Trash generation rates were developed through the quantification and characterization of trash captured in Water Board-recognized full-capture treatment devices installed in the San Francisco Bay area. Trash generation rates estimated from this study are listed for each land use type in Table 1. Methods used to develop trash generation rates are more fully described in BASMAA (2011b, 2011c, and 2012).

Table 1. San Francisco Bay Area trash generation rates by land use (gallons/acre/year).

Land Use	Low ^b	Best ^b	High ^b
Commercial & Services	0.7	6.2	17.3
Industrial	2.8	8.4	17.8
Residential ^a	0.3 - 30.2	0.5 - 87.1	1.0 - 257.0
Retail ^a	0.7 - 109.7	1.8 - 150.0	4.6 - 389.1
K-12 Schools	3	6.2	11.5
Urban Parks	0.5	5.0	11.4

^a For residential and retail land uses, trash generation rates are provided as a range that takes into account the correlation between rates and household median income.

^b For residential and retail land uses: Low = 5% confidence interval; Best = best fit regression line between generation rates and household median income; and, High = 95% confidence interval. For all other land use categories: High = 90th percentile; Best = mean generation rate; and, Low = 10th percentile.

1.2.3 Short-Term Trash Load Reduction Plan

In February 2012, the Town of Los Gatos submitted a Short-Term Trash Plan (STTP) that described the current level of control measure implementation and identified the type and extent to which new or enhanced control measures would be implemented to attain a 40% trash load reduction from its MS4 by July 1, 2014. Since that time, the Town of Los Gatos has begun to implement its Short-Term Plan. Control measures implemented to date via the Short-Term Trash Plan, excluding pre-MRP control measure except where described, include:

- **Control Measure #1- Full-Capture Treatment Devices (QF-5 STTP):** Provision C.10.a.iii of the MRP required the Town of Los Gatos to install a minimum number of full trash capture devices to treat 30% of area from commercial land use. To meet the July 1, 2014 requirement, the Town installed 30 devices to treat 60.05¹ acres as of February 2013. An additional seven devices were installed on private property. Maintenance for municipal owned devices includes annual cleaning prior to major rain events, plus checks for signs of flooding during “wet season” and cleaning as necessary to alleviate flooding. Los Gatos’ private contractor provides annual cleaning and submits both electronic and hard copy reports to Los Gatos for recordkeeping. Additionally, Los Gatos staff clean inlets before or during rain events on an as-needed basis. No performance issues associated with the devices were observed as of June 30, 2013. Privately owned devices are required to be maintained by owners and are inspected on a routine basis, as required by the MRP.

¹Treatment area matches current SCVURPPP generated FCD map and differs from previous estimates reported in the Town’s Short Term Plan and FY11-12 Annual Report. Further work with SCVURPPP will be conducted to reconcile the calculation for surface trash generation area draining into the FCD and will be reported in the FY12-13 Annual Report.

- **Control Measure #2- Enhanced Storm Drain Inlet Maintenance (QF-4 STTP):** During the Short-Term Plan, the Town of Los Gatos increased the storm drain O&M program from a level that provided annual inspection and cleaning of 50% of system (i.e. full system every two years) to a level that utilizes a private contractor to provide annual inspections of the entire system with cleaning on an as needed basis. Records of storm drain inlet maintenance are stored electronically by the WVCWP and both electronic and hard copies are stored by the Town of Los Gatos.
- **Control Measure #3- Activities to Reduce Trash from Uncovered Loads (CR-4 STTP):-** The Town of Los Gatos' Joint Powers Authority (JPA) contract with its franchised waste hauler requires the hauler to cover loads when transporting trash and debris to the disposal site. Amendments to the 2006 hauler agreement required the hauler to switch to enclosed trucks. Additionally, the Town's hauler is the exclusive roll-off and debris box provider for the Town, which prohibits private haulers from working within the Town. The Town of Los Gatos adopted language specifying the requirement of covered loads in the Town's contracts with private contractors (e.g. landscape contractors) as of July 30, 2012. Additionally, all Town vehicles require a cover.

The Town of Los Gatos' municipal ordinance requires that all conveyances used to haul waste and other materials be covered and enclosed to prevent the contents from entering the public right-of-way and adjacent lands. Additionally, the Town of Los Gatos Police Department actively enforces the CA Vehicle Code Sections 23114 and 23115, monitoring vehicles with uncovered loads and issuing monetary fines, as appropriate, to vehicles observed with uncovered loads in the Town of Los Gatos.

- **Control Measure #4- Anti-littering and Illegal Dumping Enforcement Activities (CR-5 STTP):** The Town installed a pre-MRP physical barrier in the form of a gate at an area the Town identified as a hot spot for illegal dumping. Since its installation in November 2011, there have been no incidents of dumping at the site. The site is visually observed by Town staff periodically to deter future illegal dumping. In addition, other sites are monitored for repeat illegal dumping and any reported dumping is cleaned up within 24 business hours.

As of December 31, 2012, the Town updated its Illicit Discharge Detection and Elimination (IDDE) Enforcement Response Program (ERP) to include trash and illegal dumping as types of stormwater violations that can be met with a citation (as warranted). The IDDE reporting program allows for the Town's IDDE responder to investigate complaints received regarding trash and illegal dumping in order to identify violators, in addition to ongoing surveillance by staff of illegal dump sites. Typically all illegal dumping incidents are picked up within 24 business hours.

- **Control Measure #5- Improved Trash Bins/Container Management (CR-6 STTP):** The Town of Los Gatos' Municipal code requires all commercial and residential properties to have a minimum of once-a-week waste collection service. The municipal ordinance prohibits the accumulation of waste on any property in the Town and the hauler may require changes to service levels or container types in order to prevent the accumulation of excess waste. Los Gatos' municipal ordinance requires proper placement of debris boxes by prohibiting the placement of debris boxes on any Town street. This encourages safety for motorists and pedestrians and prevents the improper disposal of waste, including illegal dumping. Debris boxes must be provided by the Town's franchised hauler and must remain on private

property through the duration of their use. The Town of Los Gatos utilizes its waste hauler to ensure all businesses and households within the Town have adequate trash service (i.e., sufficient trash collection or use of bins of the appropriate size) through its JPA agreement with the hauler, which was updated with BMP's in 2013.

- **Control Measure #6- Creek, Channel, Shoreline Cleanups (QF-6 STTP):** Town staff monitors and responds to complaints of trash or illegal dumping and cleans up problem areas within 24 business hours. The WVCWP coordinates the Town of Los Gatos' annual MRP-required hot spot cleanup. Additionally, there are volunteer led cleanups on Coastal Cleanup Day and National River Day in the West Valley agencies.
- **Control Measure #7- Polystyrene Foam Food Service Ware Policies (CR-2 STTP):** In fiscal year 2012-13, the Town of Los Gatos implemented an internal ban for Town facilities and events prohibiting the purchase and distribution of polystyrene food service ware by Town staff and event vendors.
- **Control Measure #8- Public Education and Outreach Programs (CR-3 STTP):** The Town of Los Gatos participates in regional and countywide education programs through its participation in BASMAA's Regional Media Relations Project and Youth Outreach Campaign "Be the Street", SCVURPPP's Watershed Watch Campaign and ZunZun presentations. These campaigns provide anti-littering and pollution prevention messaging to the community and through school outreach programs. Locally, the Town utilizes WVCWP to provide newsletter articles, press releases, web/media event notices, host events including National River Cleanup Day, Coastal Cleanup Day, and school presentation and outreach events which focus on trash reduction.

Control measures described in this Long-Term Plan build upon actions taken to-date via the Town's Short-Term Plan. A full description of control measures implemented via short and long-term plans is included in section 3.2. Outcomes associated with short-term plan implementation will be reported in the Town of Los Gatos Fiscal Year 2013-14 Annual Report, scheduled for submittal to the Water Board by September 15, 2014.

1.3 Organization of Long-Term Plan

This Long-Term Plan is organized into the following sections:

- 1.0 Introduction;
- 2.0 Scope of the Trash Problem;
- 3.0 Trash Management Areas and Control Measures;
- 4.0 Progress Assessment Strategies; and
- 5.0 References

Section 2.0 is intended to provide a description of the extent and magnitude of the trash problem in the Town of Los Gatos. Control measures that will be implemented by Town of Los Gatos as a result of this Long-Term Plan are described in section 3.0. Section 4.0 describes the methods that will be used to assess progress toward trash reduction targets.

2.0 SCOPE OF THE TRASH PROBLEM

2.1 Permittee Characteristics

Incorporated in 1887, the Town of Los Gatos is located in Santa Clara County, and has a jurisdictional area of 7,281 acres. According to the 2010 Census, it has a population of 29,413, with a population density of 2,635.6 people per square mile, and average household size of 2.35. Of the 29,413 who call the Town of Los Gatos home, 22.3% are under the age of 18, 4.9% are between 18 and 24, 22.9% are between 25 and 44, 32.0% are between 45 and 64, and 17.9% are 65 or older. The median household income was \$122,875 (2007-2011). Companies such as Netflix, Verizon, Alain Pinel Realtors, and Misson Oaks Hospital are located in the Town of Los Gatos.

The Town of Los Gatos is accessed by Highways 85, 17, and 9. Los Gatos has a limited homeless presence including homeless encampments. Los Gatos staff provide visual observation of the Town for trash issues during routine maintenance activities and rely on complaints from residents and businesses to report excess trash and illegal dumping issues. The Town has a successful response rate for cleaning up reported trash and illegal dumping issues within 24 business hours. When possible, the violators are identified and provided anti-trash messaging by Town staff.

Land uses within the Town of Los Gatos depicted in ABAG (2005) are provided in Table 2. The Town of Los Gatos is primary comprised of residential land use. Other land uses include commercial and services, retail, K-12 schools, and urban parks.

Table 2. Percentages of the Town of Los Gatos' jurisdictional area¹ within land use classes identified by ABAG (2005)

Land Use Category	Jurisdictional Area (acres)	% of Jurisdictional Area
Commercial and Services	375.4	5.4%
Industrial	58.8	0.8%
Residential	3,709.3	53.2%
Retail	160.7	2.3%
K-12 Schools	146.2	2.1%
Urban Parks	39.2	0.6%
Other	2,483.8	35.6%

2.2 Trash Sources and Pathways

Trash in San Francisco Bay Area creeks and shorelines originates from four source categories and is transported to receiving waters by a number of pathways (Figure 3). *Pedestrian trash* includes trash sources from high traffic areas near businesses and schools, transitional areas

¹ A Permittee's jurisdictional area is defined as the urban land area within a Permittee's boundary that is not subject to stormwater NPDES Permit requirements for traditional and non-traditional small MS4s (i.e. Phase II MS4s) or the California Department of Transportation, or owned and maintained by the State of California, the U.S. federal government or other municipal agency or special district (e.g., flood control district).

where food/drinks are not permitted (e.g. bus stops), and from public or private special events with high volumes of people. *Trash from vehicles* originates from automobiles and uncovered loads. *Inadequate waste container management* includes sources such as overflowing or uncovered containers and dumpsters, as well as, the dispersion of household and business-related trash and recycling materials before, during, and after collection. *On-land dumping* of trash is the illegal depositing of waste in unauthorized locations.

Trash is transported to receiving waters through three main pathways: 1) Stormwater Conveyances; 2) Wind; and, 3) Direct Dumping. Stormwater or urban runoff conveyance systems (e.g., MS4s) consist of curbs/gutters, and pipes and channels that discharge to urban creeks and the San Francisco Bay shorelines. Wind can also blow trash directly into creeks or the Bay. Lastly, trash in receiving waters can also originate from direct dumping into urban creeks and shorelines.

This Long-term Plan and associated trash control measures described in Section 3.0 are focused on reducing trash from one of the transport pathways illustrated in Figure 3—**stormwater conveyances**. Specifically, the Long-term Plan is focused on reducing the impacts of discharges from MS4s to San Francisco Area receiving waters and the protection of associated beneficial uses.

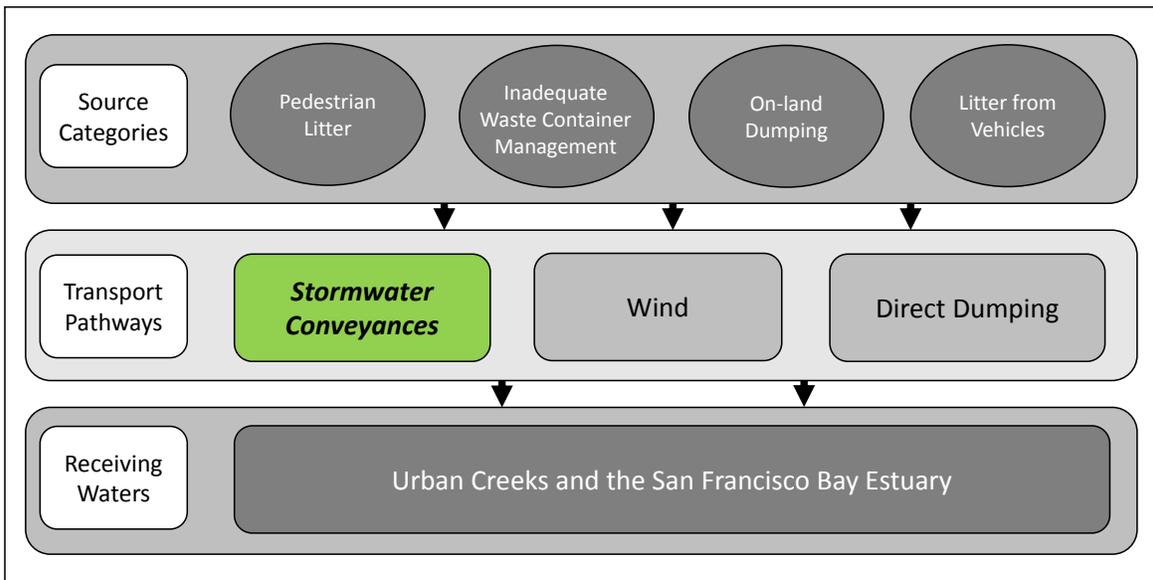


Figure 3. Trash sources categories and transport pathways to urban creeks.

Currently, the Town of Los Gatos has a limited homeless problem requiring the cleanup of homeless encampments at creeks or illegal dumping sites. When resources are available, the Town’s Parks Department has worked with the homeless to cleanup encampments. Once direct, or illegal, dumping sites or areas generating large volumes of trash from wind are found by Town staff or reported by the public, they are typically cleaned within 24 businesses hours.

2.3 Trash Generating Areas

2.3.1 Generation Categories and Designation of Areas

The process and methods used to identify the level of trash generation within the Town of Los Gatos are described in this section and illustrated in Figure 4.

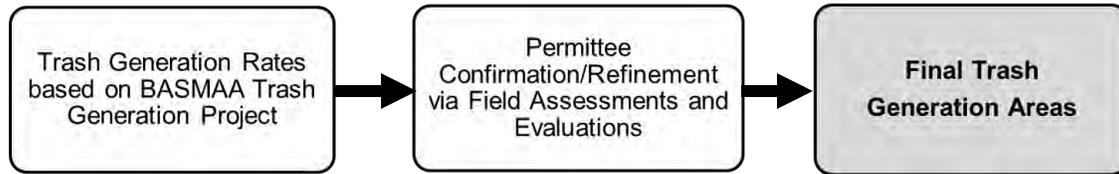


Figure 4. Trash generation area development process.

As a first step, trash generation rates developed through *the BASMAA Trash Generation Rates Project* were applied to parcels within the Town of Los Gatos based on current land uses and 2010 household median incomes. A Draft Trash Generation Map was created as a result of this application. The draft map served as a starting point for the Town of Los Gatos towards identifying trash generating levels. Levels of trash generation are depicted on the map using four trash generation rate (gallons/acre/year) categories that are symbolized by four different colors as illustrated in Table 3.

Table 3. Trash generation categories and associated generation rates (gallons/acre/year).

Category	Very High	High	Moderate	Low
Generation Rate (gallons/acre/year)	> 50	10-50	5-10	< 5

The Town of Los Gatos then reviewed and refined the draft trash generation map to ensure that trash generation categories were correctly assigned to parcels or groups of parcels. Town staff refined maps using the following process:

1. Based upon knowledge of trash generation and problem areas within the Town, staff identified areas on the draft map that potentially had incorrect trash generation category designations.
2. Trash generation category designations identified in step #1 were then assessed and confirmed/refined by the Town using the methods listed below.

a. On-Land Visual Assessments

To assist Permittees with developing their trash generation maps, BASMAA developed a *Draft On-land Visual Trash Assessment Protocol (Draft Protocol)*. The Draft Protocol entails walking a street segment and visually observing the level of trash present on the roadway, curb and gutter, sidewalk, and other areas adjacent to the street that could potentially contribute trash to the MS4. Based on the level

of trash observed, each segment (i.e., assessment area) was placed into one of four on-land assessment condition categories that are summarized in Table 4. Teams of two (one WVCWP staff and one Town staff) conducted on-land visual assessments in multiple areas to visually assess the levels of trash on the ground. For each site, each team member completed a data collection form and took photographs. Using the Draft Protocol the Town assessed a total of eight areas to assist in conducting/refining trash generating area designations.

Table 4. Definitions of on-land trash assessment condition categories.

On-land Assessment Condition Category	Summary Definition
A (Low)	Effectively no trash is observed in the assessment area.
B (Moderate)	Predominantly free of trash except for a few pieces that are easily observed.
C (High)	Trash is widely/evenly distributed and/or small accumulations are visible on the street, sidewalks, or inlets.
D (Very High)	Trash is continuously seen throughout the assessment area, with large piles and a strong impression of lack of concern for trash in the area.

b. Querying Municipal Staff

Town of Los Gatos staff coordinated with WVCWP staff to review and update preliminary Land Use maps provided by SCVURPPP based on the Town’s current General Plan Land Use map and staff knowledge. The updated land use data was used to develop the draft Trash Generation Maps received on April 16, 2013. After reviewing the draft Trash Generation Maps, staff identified parcels with potentially incorrect trash generation rates.

c. Viewing Areas via Google Maps – Street View

WVCWP staff also used Google street view to view trash levels on areas in question and confirm land uses. Assessment data was transferred back to SCVURPPP to revise and update the Trash Generation Map for each jurisdiction.

- Based on assessments conducted to confirm/refine trash generation category designations, SCVURPPP provided the Town with a Final Trash Generation Map that depicts the most current understanding of trash generation within the Town of Los Gatos. The Town documented this process by tracking the information collected through the assessments and subsequent refinements to the Draft Trash Generation Map. The Town of Los Gatos’ Final Trash Generation Map is included as Figure 5.

2.3.2 Summary of Trash Generating Areas and Sources

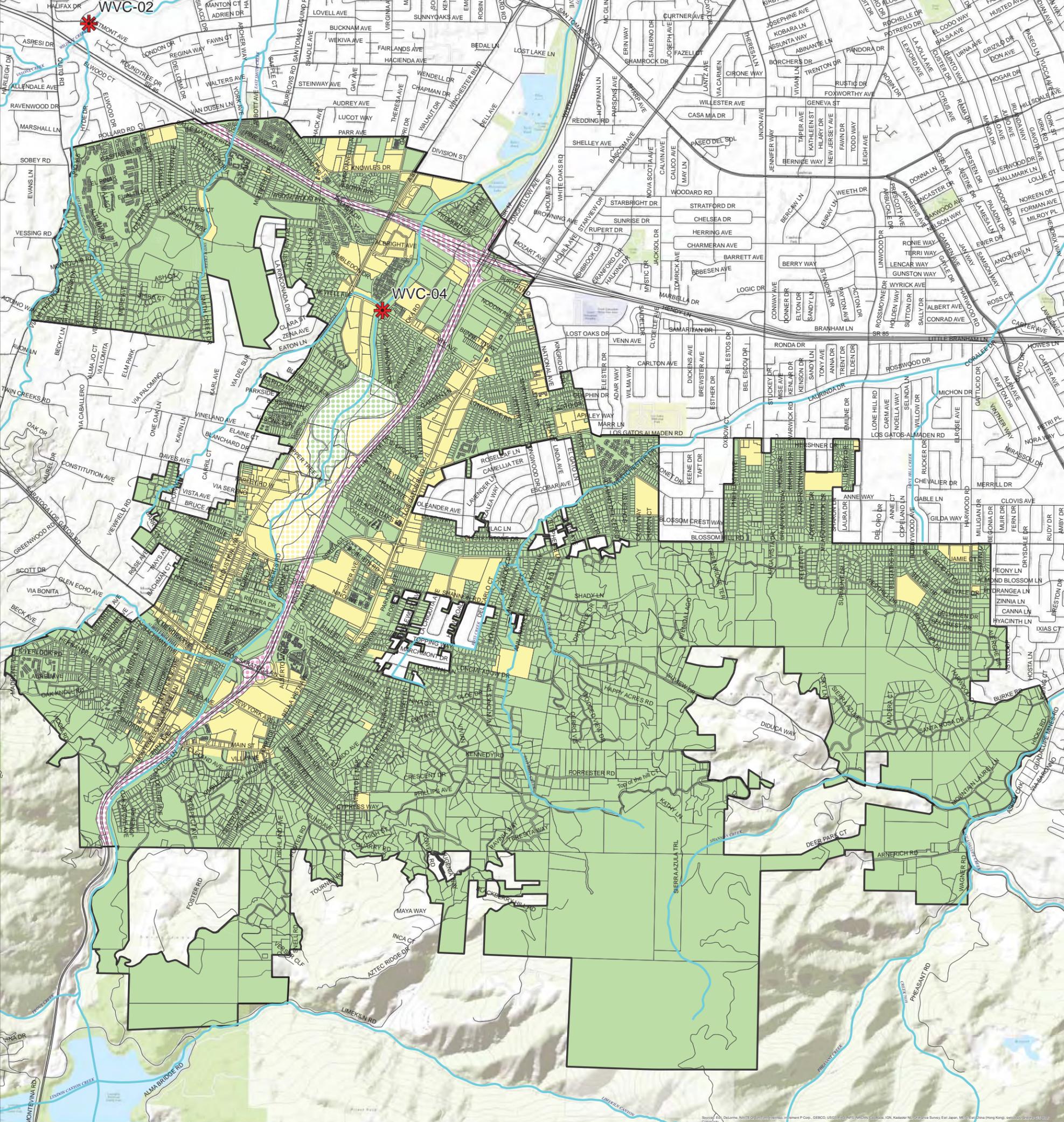
Summary statistics for land use and trash generation categories generated through the mapping and assessment process are presented in Table 5.

Table 5. Percentage of jurisdictional area within the Town of Los Gatos assigned to each trash generation category.

Trash Generation Category	Jurisdictional Area (Acres)	Commercial and Services	Industrial	Residential	Retail	K-12 Schools	Urban Parks	Other
Very High	0.0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
High	0.0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Medium	698.3	46.0%	8.4%	0.0%	21.6%	18.8%	5.2%	0.0%
Low	6,275.0	0.9%	0.0%	59.1%	0.2%	0.2%	0.1%	39.6%

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Town of Los Gatos Trash Generation Map



Legend

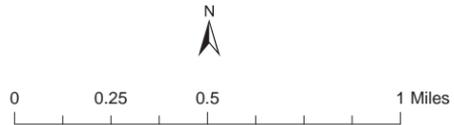
Trash Generation Category

- Low
- Medium
- High
- Very High

* Creek/Shoreline Hotspot

Non-Jurisdictional (Dot color = Generation Category)

- Streets
- Agency Boundary
- Parcel Boundary



Data Sources:
 Roads: Santa Clara County
 City Boundaries: Santa Clara County
 Background: ESRI World Topographic Map

Map Created By:
 EOA, Inc.

Date:
 December 11th, 2013

Figure 5. Final Generation Map for the Town of Los Gatos

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3.0 TRASH MANAGEMENT AREAS AND CONTROL MEASURES

This section describes the control measures that the Town of Los Gatos has implemented or plans to implement to solve trash problems and achieve a target of 100% (i.e. “No Visual Impact”) trash reduction from their MS4 by July 1, 2022. The selection of control measures described in this section is based on the Town of Los Gatos’ current understanding of trash problems within its jurisdiction and the effectiveness of control measures designed to reduce trash impacts associated with MS4 discharges. Information on the effectiveness of some trash control measures is not available. In the absence of this information, the Town based its selection of control measures on existing effectiveness information, experiences in implementing trash controls and knowledge of trash problems, and costs of implementation. As further knowledge is gained through the implementation of these control measures, the Town may choose to refine their trash control strategy described in this section. If significant revisions or amendments are made, a revised Long-Term Plan will be submitted to the Water Board through the Town of Los Gatos’ annual reporting process.

3.1 Management Area Delineation and Prioritization

Consistent with the long-term plan framework, the Town of Los Gatos delineated and prioritized trash management areas (TMAs) based on the geographical distribution of trash generating areas, types of trash sources, and current or planned control measure locations. TMAs are intended to form the management units by which trash control measure implementation can be tracked and assessed for progress towards trash reduction targets. Once delineated, TMAs were also prioritized for control measure implementation. The Town of Los Gatos’ primary management areas were selected based on the spatial distribution of trash generating areas and the location of specific existing or planned management actions within Town’s jurisdiction. Town staff used the following procedure to designate TMAs:

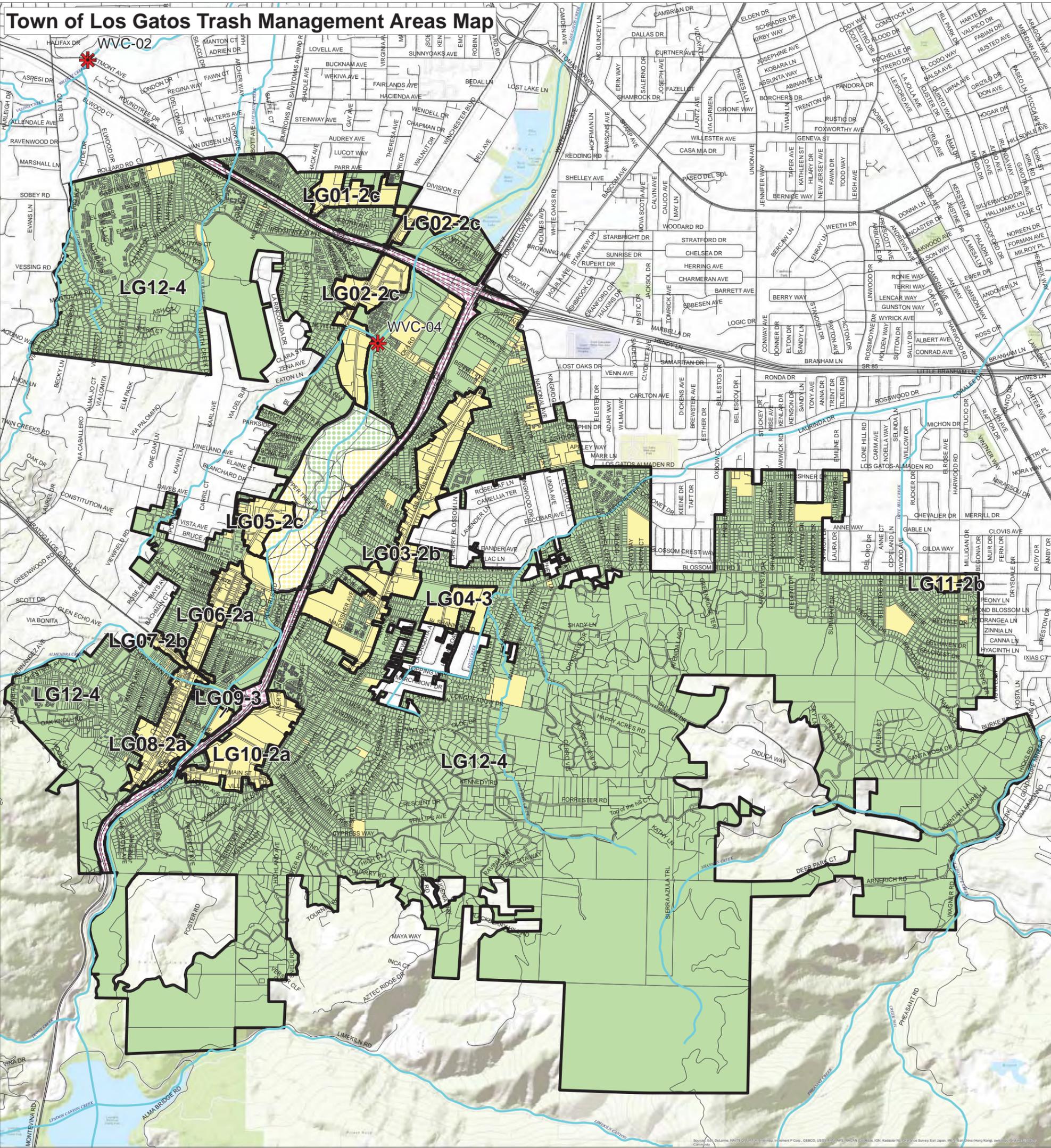
The Town of Los Gatos, in alignment with the practice of other West Valley Permittees (Monte Sereno, Campbell, and Saratoga), coordinated with WVCWP staff to review the Town’s Trash Generation Map and develop a common guideline for determining prioritization of trash generating areas within the jurisdiction. For the West Valley communities, priority was given first to high trash generation areas (Campbell only) and then to medium trash generation areas. Within the high and medium trash generation areas, priority was given to industrial zones with high trash generation rates. The next priority was given to high or medium trash generation areas with commercial retail area and/or downtown business districts where high pedestrian usage occurs. Subsequent priority areas (from highest to lowest) include: arterial commercial/retail, office uses and/or light industrial, public uses (parks, schools, churches), and residential. The lowest priority was given to single-family residential areas with a low generation rate. Currently, the Town of Los Gatos has no very high or high trash generation areas, therefore the Town is choosing control measures to reduce trash in medium trash generation areas.

A map depicting the Town’s TMAs is included as Figure 5. All jurisdictional areas within the Town are included within a TMA. The amount of jurisdictional land area and associated trash condition categories for each TMA are included in Table 6. Additionally, Table 6 shows the prioritization of control measure adoption in the TMAs for Los Gatos. Control measure adoption is likely to occur town-wide due to the small size of the Town and that the land use does not vary significantly among TMAs, and there are no very high or high trash generation areas in the town.

Table 6. Jurisdictional area and percentage of each Trash Management Area (TMA) comprised of trash generation categories

TMA Priority	TMA Map ID	Jurisdictional Area (Acres)	Trash Generation Rate			
			Very High	High	Medium	Low
1	LG06-2a	40.9	0.0%	0.0%	98.8%	1.2%
2	LG10-2a	80.5	0.0%	0.0%	99.2%	0.8%
3	LG08-2a	58.6	0.0%	0.0%	98.6%	1.4%
4	LG03-2b	165.0	0.0%	0.0%	90.5%	9.5%
5	LG11-2b	8.4	0.0%	0.0%	100.0%	0.0%
6	LG07-2b	8.3	0.0%	0.0%	100.0%	0.0%
7	LG05-2c	32.0	0.0%	0.0%	98.9%	1.1%
8	LG01-2c	36.0	0.0%	0.0%	100.0%	0.0%
9	LG02-2c	88.9	0.0%	0.0%	100.0%	0.0%
10	LG04-3	30.6	0.0%	0.0%	100.0%	0.0%
11	LG09-3	6.5	0.0%	0.0%	100.0%	0.0%
12	LG12-4	6,417.6	0.0%	0.0%	2.5%	97.5%

Town of Los Gatos Trash Management Areas Map



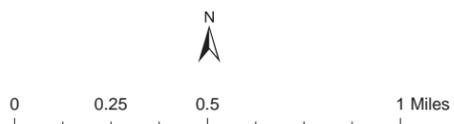
Legend

Trash Generation Category

- Low
- Medium
- High
- Very High

Other Symbols:

- Creek/Shoreline Hotspot
- Trash Management Area
- Non-Jurisdictional (Dot color = Generation Category)
- Streets
- Agency Boundary
- Parcel Boundary



Data Sources:
 Roads: Santa Clara County
 City Boundaries: Santa Clara County
 Background: ESRI World Topographic Map

Map Created By:
 EOA, Inc.

Date:
 December 11th, 2013

Figure 6. Trash Management Area Map for the Town of Los Gatos

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3.2 Current and Planned Trash Control Measures

The Town of Los Gatos has actively worked to provide maintenance service to its constituents, as well as regulate litter and illegal dumping to maintain a pristine and functional Town so that its streets and other land uses do not have a negative impact on local waterways and the San Francisco Bay. Prior to the MRP the Town had control measures or best management practices and standard operating procedures in place to maintain a clean Town. Through the Short-Term and Long-Term Plans the Town is seeking to enhance existing control measures and develop new control measures for improved data collection, reporting, assessments, and cleanups. When funding and other Town resources, such as grants and staff time are available, the Town will work to evaluate the best opportunities to prevent (i.e. source control) and cleanup litter through the duration of this Long-Term Plan from 2014 to 2022.

The combination of jurisdictional-wide and TMA specific control measures described below are expected to achieve full trash reductions within the TMAs to reduce moderate and high generating areas to low generating areas. Jurisdictional-wide programs may be selected for isolated enhancement in TMAs when needed. For example, a single TMA may receive enhanced street sweeping over an adjacent TMA. However, it is likely that most control measures will be implemented Town-wide or in multiple TMAs. Therefore, jurisdictional-wide control measures are prioritized along with potential control measures specific to TMAs beginning in Section 3.2.2.

The proposed adoption and timeline for implementation of all control measures planned will be dependent on available Town funds and program resources (i.e. staff and equipment). Additionally, control measure selection will be dependent on the results of the *Trash Assessment Strategy* described in Section 4.0 in determining the best control measures to achieve full trash capture equivalency.

3.2.1 Jurisdiction-wide and Trash Management Area Specific Control Measures

The Town of Los Gatos will continue to provide ongoing monitoring during normal daily maintenance activities throughout the Town. Any resulting new or existing trash problem areas that need enhanced control measures will be flagged and addressed accordingly. Although primarily targeting moderate generation areas, the Town will adopt control measures Town-wide as needed to address commercial land uses generating trash. Efforts at providing outreach to the Town residents and businesses will continue. Other Jurisdiction wide efforts may include product bans and other efforts as they become viable.

Full-Capture Treatment Devices

Post-MRP Actions (December 2009-July 1, 2014)

As required by the Short-Term Plan, FCDs to treat 30% of commercial land use were installed by July 1, 2014 target. Thirty devices were installed as shown in Figure 7. Additionally, seven devices were installed on private property. All 30 devices installed by the Town are Advanced Solution's AS-1 (ST3G) small devices that fit inside the catch basins. This type of device was selected based on demonstrations and feedback on units that are in service at other municipalities in Santa Clara County. An important feature of these units is the ability to remove and replace them for cleaning and maintenance activities with minimal effort. Municipal maintenance activities include annual cleaning prior to rainy season and cleaning before a major rain event, plus checks for signs of flooding during the "wet season" and cleaning as necessary to alleviate flooding. Los Gatos' contractor provides annual cleaning and submits both electronic and hard copies to Los Gatos for recordkeeping. Also, Los Gatos' maintenance staff provides support through pre-storm assessments and during-

storm checks with cleaning as needed. No FCD maintenance issues have been reported as of the 2012-2013 Annual Report. Privately owned devices are required to be maintained by owners and are inspected on a routine basis, as required by the MRP

Planned Actions (July 2014-July 2022)

The Town will evaluate its fiscal budget annually beginning fiscal year 2014-2015 to determine if funds are available to install new FCDs throughout the Town in addition to the devices existing. Due to the capital expense and ongoing maintenance requirements and costs, FCDs may be evaluated compared to other jurisdictional-wide and TMA specific control measures that can provide FCD equivalent treatment. FCD equivalency will be based on the assessment strategy study described in Section 4.0. Based on the results of the study and provided no fiscal complications are identified to prohibit the administration of capital improvement funds, a new FCD will be planned for installation in TMAs not achieving trash load reduction through other control measures. Currently, there are no very high or high trash generations areas under the Town's jurisdiction in Los Gatos' existing TMAs. If additional FCDs are installed they will be installed first in high priority TMAs, or TMAs with moderate trash load generation areas with commercial/retail land uses and light industrial/office uses such as LG05-2c, LG06-2a, LG07-2b, LG08-2a.

The Town would likely install Advanced Solution AS-1 (ST3G) (connector pipe screens), which is the same type of device installed at the existing FCD locations that were required as part of the 2009 MRP. The device type may be adjusted as new and improved Water Board approved devices become available or if repair costs and maintenance needs for the existing device type are found to be too burdensome. Following installation of the device, maintenance will be performed annually prior to the first major rain event with additional maintenance as needed. As of February 1, 2014 the Town's storm drain inlet maintenance contractor performs inspections and maintenance annually, with support from the Town's maintenance staff. If any changes are made to this contract (i.e. the Town takes on all inlet cleaning), all FCDs will continue to be inspected at a minimum of once annually.

Street Sweeping

Pre-MRP Actions (Prior to 2009)

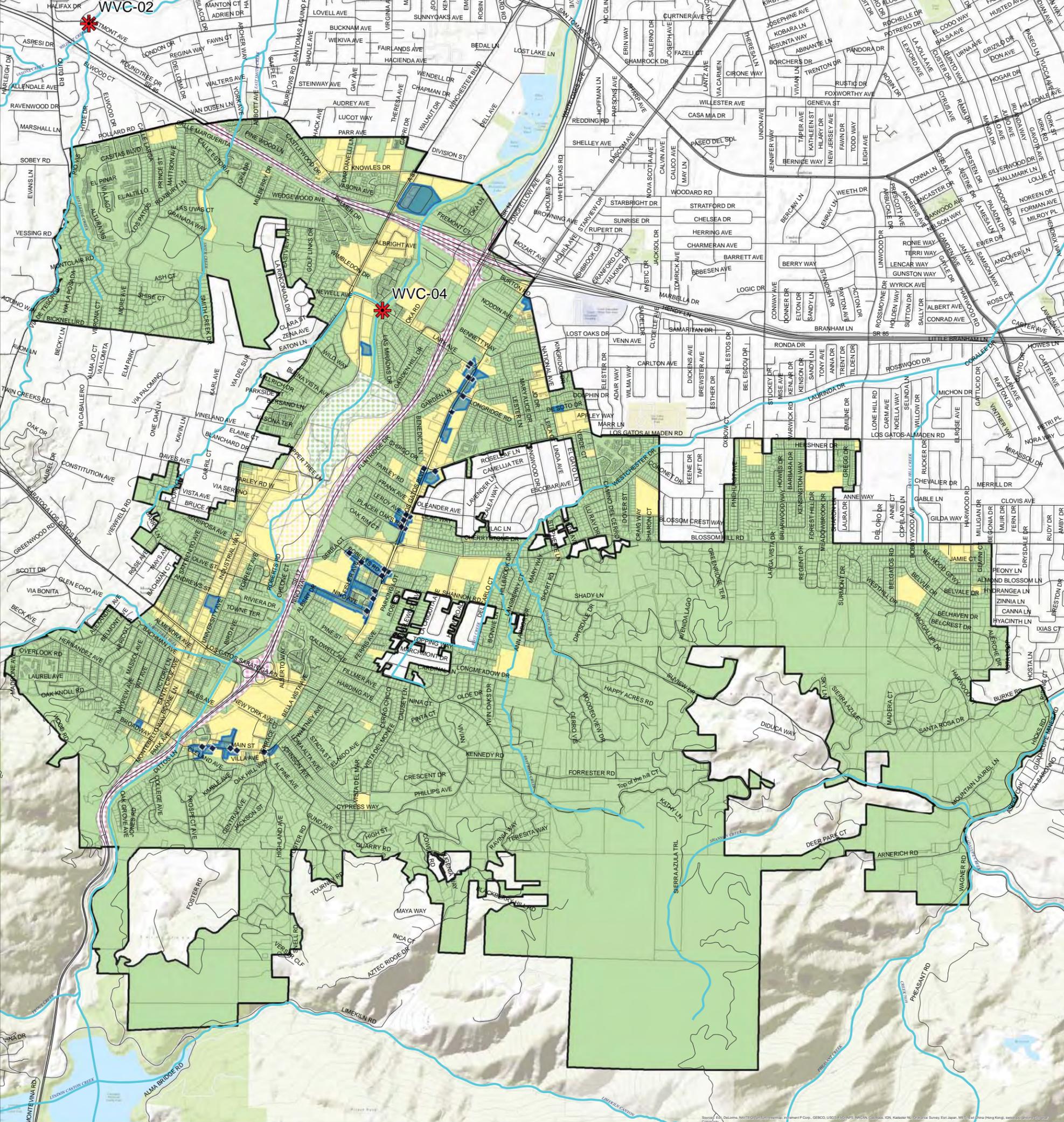
The Town of Los Gatos' pre-MRP street sweeping program included sweeping arterial streets in the Town once per month and the downtown area one time per week. Parking enforcement signs for street sweeping are posted in select areas of the Town.

Planned Actions (July 2014-July 2022)

Each fiscal year from 2014-2022, the Town of Los Gatos will evaluate its street sweeping program to determine if problem areas exist where street sweeping above the fiscal year 2013-2014 frequencies, would provide a benefit. Any changes to the street sweeping program are likely to occur proportionately town-wide. The downtown area, which includes TMAs LG06-2a, LG08-2a, LG10-2a, and already receives enhanced sweeping, could also see further increases. Other enhancements to street sweeping may include sweeping arterial roads twice monthly. If street sweeping changes do not occur town-wide, the following TMAs will be prioritized for twice monthly street sweeping beginning in fiscal year 2013-2014: LG04-3 and LG07-2b.

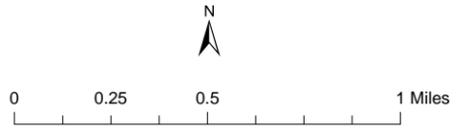
Changes to the street sweeping frequencies will be based on available funding, and the *Trash Assessment Strategy*. The Town may consider the implementation of additional signage to improve access to the curb in fiscal year 2017-2018.

Town of Los Gatos Full Trash Capture Map



Legend

Trash Generation Category	Creek/Shoreline Hotspot	Streets
Low	Full-Capture Location	Agency Boundary
Medium	Full Trash Capture	Creeks
High	Non-Jurisdictional (Dot color = Generation Category)	Parcel Boundary
Very High		



Data Sources:
 Roads: Santa Clara County
 City Boundaries: Santa Clara County
 Background: ESRI World Topographic Map

Map Created By:
 EOA, Inc.

Date:
 January 15th, 2014

Figure 7. Trash Full Capture Device Map for the Town of Los Gatos

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On-Land Trash Cleanups

Pre-MRP Actions (Prior to 2009)

Developed in 2004, the Town of Los Gatos' Performance Standard for Public Streets, Roads and Highways Operation and Maintenance requires the Town to provide trash control in the Town's roadways, with the exception of Highways 85, 17, and 9, which are under the jurisdiction of CalTrans.

Best Management Practices (BMPs) for trash control include:

- Posting "No Littering" signs where needed and enforcing anti-littering laws.
- Providing trash receptacles as necessary in commercial areas and common public gathering areas (such as trails, parks, pedestrian ways, public trailheads and downtown)
- Emptying public trash receptacles on an appropriate frequency to prevent spillage.
- Integrating anti-littering messages into municipal public education efforts and media outlets.

As part of the 2004 Performance Standard, Los Gatos provides anti-littering or dumping signs when needed. As described in the Short-Term Plan, Town staff regularly monitor and maintain problem trash areas by providing clean-up and physical barriers to deter trash or illegal dumping, on an as-needed basis.

Town staff regularly maintains medians, sidewalks, landscaped areas, roads, and parks and trails for trash control. Town staff follows an aggressive protocol to cleanup discovered or reported illegal dumping or high volume trash areas within 24 business hours. In addition, depending on availability of staff and site needs, volunteer cleanups are organized by the Town, as schools and volunteer groups often reach out to the Town for cleanup projects.

Post-MRP Actions (December 2009-July 1, 2014)

The Town of Los Gatos began organized cleanups of known on-land trash problem areas, including homeless encampments and transient areas, in TMA LG09-3 and LG10-2a, in July of 2011. These cleanups occur throughout each month and are organized by the Town's Park Ranger. Bags are provided to volunteers, including the homeless population, who are instructed to clean up the sites to prevent trash flow to the MS4 or creeks.

Planned Actions (July 2014-July 2022)

The Town will continue to maintain medians and right-of-ways with regular visual observations as a part of during normal maintenance routines with the goal of identifying persistent problem areas. The Town documents high trash areas through their maintenance management system. If new trash problem areas are identified, the Town will consider implementing anti-littering or dumping signage or physical barriers. Observation frequencies may be increased, as needed, depending on staff availability and resources. Staff is deployed to clean up areas that need more attention on an as-needed basis.

Beginning in March 2014, with the implementation of the Town's new solid waste franchise agreement, Los Gatos will rely on its hauler to provide outreach through media, such as newsletters, flyers, door hangers, notification tags, and direct contact to

businesses and residents, including multi-family complexes. Outreach messaging must be approved by the West Valley Solid Waste Management Authority and plans include providing information on source reduction and anti-littering. The hauler will also provide outreach to schools through other programs, including presentations and contests that will include anti-littering messaging.

In fiscal year 2018-2019 the Town of Los Gatos will consider implementing language for its Event Use Permits that require enforceable action (i.e. fines) for trash cleanup by Town staff. That is, as part of the event permit, participants will be required to clean up all trash during and after the event to prevent trash entering the storm drain system. If trash is found at the conclusion of the event by Town staff fines may be issued, which may take the form of withholding deposits.

Additionally, through its role as a SCVURPPP Co-Permittee, Los Gatos will assist in developing partnerships with transportation agencies such as Caltrans. Highways, such as 85, 17, and 9, and on/off-ramps contribute large trash volumes to the Town's TMAs and waterways. However, the Town does not have jurisdiction over, or permission to access, these roadways for trash cleanup or the implementation of other control measures such as physical barriers or trash capture devices. Therefore, SCVURPPP began conversations with CalTrans in 2013 that Los Gatos will continue to participate in through the life of the Long-Term Plan in order to reduce the very high or high trash generation rates in these areas through Caltrans or Town implemented control measures.

Partial-Capture Treatment Devices

Planned Actions (July 2014-July 2022)

The Town will consider the installation of partial-capture devices beginning in fiscal year 2017-2018. Curb inlet bar screens or new technologies will be considered, especially if new FCDs or other equivalent control measures are not deemed feasible. All additional efforts will be dependent on available Town funds.

Additionally, in fiscal year 2018-2019 the Town of Los Gatos will consider including in its Event Use Permits, language that requires the installation of temporary storm drain covers (e.g. berms) during any event on Town property or right-of-way. Temporary covers will allow for protection of the storm drain during events where a high probability of generating trash exists, while not requiring more permanent devices that are more costly and require on-going maintenance. Event Use Permits will target events on Town property in the downtown TMAs including LG06-2a, LG08-2a, and LG10-2a, as well as TMAs containing parks (LG12-4) or other public land uses.

Enhanced Storm Drain Inlet Maintenance

Pre-MRP Actions (Prior to 2009)

Prior to the MRP, storm drain inlet maintenance occurred on a rotating basis, with cleaning conducted every other year by a private contractor. Additional support during the wet season was provided by Town maintenance staff.

Post-MRP Actions (December 2009-July 1, 2014)

As described in the Short-Term Plan, storm drain inlet maintenance was enhanced from pre-MRP levels (biennially) to a level where all storm drains are inspected annually and cleaned on an as-needed basis. This program took effect July 1, 2012. Storm drain inlets are maintained by the Town's contractor with additional support from Town maintenance staff (i.e. prior to or during rain events).

Planned Actions (July 2014-July 2022)

As needed and dependent on available staff resources and funding, the Town may enhance the frequency of cleanups via its existing contract or the allocation of additional Town maintenance staff time if problem inlets or devices are identified as needing a higher level of maintenance. Through the existing annual inspections the Town will consider an improved record-keeping system for monitoring and identification of problem inlets. This effort will feed off of information obtained through contractor and maintenance staff reports. Enhancements will likely occur Town-wide, but may alternatively be increased in selected TMAs when problem inlets or devices are identified that need increased cleaning through the Town's monitoring program.

Activities to Reduce Trash from Uncovered Loads**Pre-MRP Actions (Prior to 2009)**

The Town of Los Gatos' Joint Powers Authority (JPA) contract with its franchised waste hauler requires the hauler to cover loads when transporting trash and debris to the disposal site. Amendments to the 2006 hauler agreement required the hauler to switch to enclosed trucks. Additionally, the Town's hauler is the exclusive roll-off and debris box provider for the Town, which prevents private haulers that may not be regulated to have covered loads, from entering the Town.

The Town of Los Gatos' municipal ordinance requires that all conveyances used to haul waste and other materials be covered and enclosed to prevent the contents from entering the public right-of-way and adjacent lands.

Planned Actions (July 2014-July 2022)

The Town of Los Gatos will consider adopting language specifying the requirement for covered loads in the Town's contracts with private contractors (e.g. landscape contractors). Similarly, the Town will consider creating standard operating procedures for Town staff. Both of these efforts would target implementation by July 1, 2019.

The Town's new solid waste franchise agreement, with scheduled implementation in March 2014, will continue to require covered loads for hauler trucks and debris boxes. Vehicles are subject to inspection by the JPA and must be cleaned and maintained to prevent the spread of trash.

The Town will continue to rely on the Police Department to enforce CA Vehicle Code Sections 23114 and 23115 that prohibit uncovered loads and issue monetary fines, as needed. Los Gatos will evaluate the possibility of enhancing uncovered load enforcement by exploring ways to regulate uncovered loads in fiscal year 2015-2016, or in the year that contracts are being renewed with contractors. One method the Town will explore is working with the Police Department to issue fix-it tickets and require that, upon

payment of the fines for uncovered loads, violators will receive a tarp. Tarps may be distributed at the Town's Corp Yard or other central location.

Anti-littering and Illegal Dumping Enforcement

Pre-MRP Actions (Prior to 2009)

The Town of Los Gatos' Streets and Parks staff has a formal process in place to respond to complaints from the public regarding illegal dumping. If illegal dumping sites are found in response to complaints, staff picks up the materials within 24 businesses hours, and provides outreach to the violator (if identifiable).

Post-MRP Actions (December 2009-July 1, 2014)

As required by the Town's Short-Term Plan existing physical barriers and previously identified problem trash sites receive on-going monitoring of trash issues and illegal dumping.

As of December 31, 2012, the Town updated its Illicit Discharge Detection and Elimination (IDDE) Enforcement Response Program (ERP) to include trash and illegal dumping as types of stormwater violations that can be met with a citation, as warranted. The IDDE reporting program allows for the Town's IDDE responder to investigate both complaints received regarding trash and illegal dumping potential violations identified through ongoing surveillance by staff of illegal dump sites. Typically all illegal dumping incidents are picked up within 24 business hours.

Planned Actions (July 2014-July 2022)

The Town may enhance monitoring of potential problem sites beginning in fiscal year 2015-2016 by evaluating maintenance staff time and exploring the best practices and methods for monitoring and reporting trash and illegal dumping issues. Consideration may also be given to improved tracking and prevention/cleanup utilizing the maintenance management system. The Town may also consider signage or additional barriers in problem areas to deter illegal dumping.

Improved Trash Bins/Container Management

Pre-MRP Actions (Prior to 2009)

Prior to the MRP, control measure changes in the 2006 hauler agreement included the use of carts with lids, including the switch from three open bins for residential recycling to a mixed recyclables, closed-lid cart. In addition, collection containers must be issued by the hauler, therefore not allowing waste generators to place private containers (e.g. inadequately sized or open top containers) out for collection by the hauler. The Town of Los Gatos utilizes its waste hauler to ensure all businesses and households within the Town have adequate trash service (i.e., sufficient trash collection or use of bins of the appropriate size) through its JPA agreement with the hauler.

The Town's municipal code requires all commercial and residential properties to have a minimum of once-a-week waste collection service. The municipal ordinance prohibits the

accumulation of waste on any property in the Town and the hauler may require changes to service levels or container types in order to prevent the accumulation of excess waste.

Post-MRP Actions (December 2009-July 1, 2014)

In fiscal years 2012-2013 and 2013-2014 Los Gatos, along with the other West Valley cities, worked to incorporate stormwater language for trash prevention into its new solid waste franchise agreement, to be adopted in fiscal year 2013-2014. Proposed contract language included hauler provided anti-litter outreach, trash cleanup, street sweeping, improved collection technology to prevent trash, public trash containers and service, and illegal dumping collection.

In addition, since 2010 (not reported in Short-Term Plan), the Department of Environmental Health and the Fire Department have included stormwater violations, such as unkempt enclosure areas, in their annual business checklist. Any stormwater violations are reported back to the WVCWP for follow up and record keeping and to the Town for enforcement.

Planned Actions (July 2014-July 2022)

In 2017-2018, the Town will consider adopting Planning requirements for new businesses, which will require businesses to provide and service public trash containers in addition to providing trash cleanup on the business property. Provisions for public trash containers may be incorporated into the Town’s business permitting process and will include language on the recommended container types, quantity depending on property size, and service levels. The Town will hold all business licenses until these requirements are met. Additionally, businesses will be subject to enforcement, including monetary fines, if these requirements are not followed. TMAs containing commercial/retail land such as the downtown area (TMAs LG06-2a, LG08-2a, LG10-2a) and arterial retail centers (TMA LG03-2b) may be prioritized for improved public container management through the permitting process.

Through its participation in the Santa Clara County Zero Litter Initiative (ZLI) as a WVCWP member, Los Gatos is working with this committee to develop a right-size/right-service regional campaign to prevent trash generated in the waste collection process. In fiscal year 2012-2013, the WVCWP program, on behalf of the West Valley agencies, participated in a series of workshops with solid waste haulers, municipalities, and other stakeholders to develop solutions to preventing litter during waste collection. This work will continue into fiscal year 2013-2014 and possibly beyond to develop model ordinance and solid waste contract language as well as outreach materials for the best practices for ensuring residential and business collection carts and bins are properly sized with an adequate collection frequency.

Single-Use Carryout Plastic Bag Policies

Post-MRP Actions (December 2009-July 1, 2014)

The Town of Los Gatos representatives met with the other West Valley communities through its Joint Powers Authority (JPA) solid waste agreement on February 2, 2012.

The JPA voted unanimously to move forward with a single use plastic bag ban and recommended that each of the West Valley municipalities enact the ban.

Planned Actions (July 2014-July 2022)

Although not included in its Short-Term Plan, and despite a limited number of commercial or retail establishments providing single-use carryout bags, Los Gatos moved forward with the adoption of a ban on single-use plastic and paper bags. In fiscal year 2011-2012 Los Gatos participated in the San Mateo County Environmental Impact Report (EIR) and ordinance development. Los Gatos held a study session on May 6, 2013, and provided information and outreach to residents and the business community while the ban was being proposed. The ordinance was adopted by the Town Council on September 3, 2013.

The ordinance will prohibit the distribution of plastic bags and require a 10 cent charge for paper or reusable bags (increasing to 25 cents as of January 1, 2015). The ban will apply to commercial businesses that sell perishable or nonperishable goods (i.e. food and clothing), excluding restaurants and nonprofit charitable reuse organizations. Most retail business occurs in downtown (TMAs LG06-2a, LG07-2b, LG08-2a, LG10-2a) and along Los Gatos Blvd (TMA LG03-2b). Retailer toolkits were mailed to approximately 800 business license holders in November 2013. The toolkits contained information about the adopted ordinance, the effective date, information on reusable bag distributors, in addition to posters and cashier tent cards. Residential outreach will commence in December 2013 through the date of implementation on February 3, 2014, and will include a postcard mailing, press releases, and advertising placed in local newspaper publications.

Polystyrene Foam Food Service Ware Policies

Post-MRP Actions (December 2009-July 1, 2014)

As required by its Short-Term Plan, the Town adopted an internal polystyrene foam food service ware ban for Town facilities and events in fiscal year 2012-2013. As of February 1, 2014, no known violations involving the purchase or use of polystyrene foam were observed at Town facilities or internal staff related functions.

Additionally, Los Gatos started a reusable mug promotion program in 2011 to encourage people to bring their own mug to retailers rather than receive a single use beverage ware container, including polystyrene containers. Los Gatos distributes reusable mugs and bottles to staff and residents when available and some retailers provide discounts for bringing reusable mugs.

Planned Actions (July 2014-July 2022)

A Town-wide polystyrene ordinance will be considered by the Town Council in 2014, once implementation of the Reusable Bag Ban has been completed. The Town participated in the initial study of the environmental review for the Polystyrene Foam and Food Service Ware Ordinance conducted by the City of San Jose. The Town's ordinance will be based on the proposed model ordinance as outlined by the initial study. Implementation of such a ban will be dependent on available funding for outreach and staff time involved. This action will also consider including a ban on use at Town parks through event use permits (TMA LG12-4). In addition, the Town may evaluate the

progress of other West Valley cities in implementing a polystyrene foam foodware ban. Outreach for a ban would require a door-to-door educational campaign for businesses including information on impacts to businesses and acceptable alternatives to polystyrene containers. Retail business occurs mostly in downtown (TMAs LG06-2a, LG07-2b, LG08-2a, LG10-2a) and along Los Gatos Blvd (TMA LG03-2b).

The decision to move forward with a polystyrene ban will be dependent on available funds for outreach and enforcement, and whether or not it is needed to achieve full trash load reductions based on the status of other control measures planned in this Long-Term Plan.

Public Education and Outreach Programs

The Town of Los Gatos participates in the BASMAA and SCVURPPP outreach programs described below in addition to participation in the Santa Clara County Zero Litter Initiative (ZLI) Committee since 2008 and will continue to participate through the duration of the Long-Term Plan. The ZLI serves Santa Clara County to focus on trash reduction programs and outreach messaging related to trash sources and pathways such as homeless encampments and vehicle litter. Beginning in 2010, the ZLI developed a subgroup to focus on trash generation from the waste collection process from point of collection to delivery to a solid waste facility. The WVCWP represents the Town at monthly meetings and hosted one of two round table workshops in the City of Campbell. The round table workshops in fiscal year 2012-2013 brought together solid waste haulers, municipalities, non-governmental organizations, and other interested parties to discuss and develop solutions to the trash problem from solid waste collection. The ZLI has performed a survey of Santa Clara County cities on existing enforcement and outreach programs to deter trash generation and will look to develop model ordinances and a county-wide outreach program beginning in 2014. The ZLI work is expected to continue through 2022 and will address other trash sources over time, such as trash generation from self-haul vehicles and state freeways.

Post-MRP Actions (December 2009-July 1, 2014)

The Town of Los Gatos participates in regional and countywide education programs through meeting attendance and providing feedback on outreach material development for BASMAA and SCVURPPP outreach programs such as the Watershed Watch Campaign, ZunZun, the BASMAA Regional Media Relations Project, and the BASMAA Youth Outreach Campaign. These campaigns provide anti-littering and pollution prevention messaging to the community and through school outreach programs. Additionally, the WVCWP attends meetings on the Town of Los Gatos' behalf and hosts events including National River Cleanup Day, Coastal Cleanup Day, and school outreach events that have an emphasized focus on trash reduction messaging.

Planned Actions (July 2014-July 2022)

The Town will continue to contribute funding and collaborative input to regionally developed BASMAA outreach materials as described in the Short-Term Plan. Additionally, the Town expects that it will continue to contribute to new BASMAA outreach materials as developed during the length of the Long-Term Plan.

Starting in 2014-2015, the Town may perform trash assessments contiguous to school grounds, which may include public and private elementary, middle, and high schools

located in the Town (prioritized in moderate trash generating areas, such as TMA LG10-2a, as applicable). Assessments contiguous to school properties will identify if a trash problem from campus grounds is migrating to the street and MS4's. Although the Town does not have jurisdiction over schools, if campuses are identified as having persistent incidents of trash that may enter the MS4, outreach may be performed to the schools. Depending on the level and sources of trash identified on campuses, outreach may be directed to school staff and/or students. For example, if trash is isolated to waste enclosure areas that are only accessed by staff, outreach on proper enclosure maintenance may be performed to custodial staff. Alternatively, if trash is the result of student behavior, the Town may provide outreach to lead school staff (i.e. the principal or a teacher) to educate students. The Town may provide anti-trash educational materials such as posters and trainings for students as needed.

The Town may update its website to promote anti-littering messaging in fiscal year 2014-2015. Messaging will be updated as needed and may include information on trash volunteer cleanup events, proper waste container management to prevent overflow, adopt-a-creek programs, impacts of trash on the environment, the Town's promotion of reusable bags and food service ware, information on Town or hauler waste collection services or events to deter illegal dumping and provide street sweeping and trash enforcement. The Town will consider advertising a Town phone number, or hotline number, on this portion of the website for residents and businesses to report trash or illegal dumping violations. Currently, the Town is very responsive in addressing illegal dumping issues, whether they are complaint driven or observed by municipal staff, as incidents are cleaned up within 24 business hours. Town staff typically finds it difficult to identify the responsible party for an illegal dumping violation, but do perform outreach when a violator is identified. The provision of a dedicated phone number for trash related complaints will allow for tracking and record-keeping of the number of incidents over time. Incidents will be documented via a WVCWP or Town developed form and filed electronically for tracking.

3.2.2 Creek and Shoreline Hot Spot Cleanups

Post-MRP Actions (December 2009-July 1, 2014)

As part of the WVCWP, the Town of Los Gatos continues to co-sponsor regional, volunteer-based cleanups at a minimum of once annually in one of the four West Valley communities. Additionally, as required by the 2009 MRP and its 2012 Short-Term Plan, the Town of Los Gatos adopted one trash hot spot at Los Gatos Creek near Lark Avenue that is cleaned and assessed annually with the assistance of WVCWP staff and volunteers. This trash hot spot is located in TMA LG12-4. Adjacent land uses include the Los Gatos Creek Trail, single-family residential housing, and commercial space. Dominant types of trash removed from this hot spot include, Styrofoam, bottles (plastic and glass), paper, and cardboard. The last three fiscal years of data for volumes of trash removed from this hot spot are presented in Table 7.

Table 7. Volume of Trash Removed from Hot Spot

FY 2012-13 Volume of Trash Removed (cubic yards)	FY 2011-12 Volume of Trash Removed (cubic yards)	FY 2010-11 Volume of Trash Removed (cubic yards)
0.074	0.00062	0.262

Because trash levels remain low in this particular hot spot area after the initial clean-up event, Town staff will consider an alternative hot spot location during fiscal year 2014-2015 that yields more debris. Once a new location has been identified it will be inspected at least twice more within the year from the initial inspection to confirm a persistent litter problem is present.

Confirmed problem areas will be evaluated for the implementation of a new control measure which may include:

- regular visual inspection and annual cleanups of the new trash hot spot by WVCWP or Town staff,
- installation of a barrier (e.g., chain link fence or road block), if feasible,
- provision of a public trash container(s) (i.e. if on a trail),

or some other control measure deemed appropriate to reduce the amount of trash generated at problem sites.

3.2.3 Summary of Trash Control Measures

This section describes the control measures that the Town of Los Gatos has or plans to implement to address trash problems and achieve a target of 100% trash reduction (i.e. “No Visual Impact”) from their MS4 by July 1, 2022. The selection of control measures are described in detail in section 3.2, above.

Trash Management Area Map ID: LG06-2a (Priority #1)

- Full-Capture Treatment Devices
- Street Sweeping
- On-land Trash Cleanups
- Partial-Capture Treatment Devices
- Enhanced Storm Drain Inlet Maintenance
- Activities to Reduce Trash from Uncovered Loads
- Anti-littering and Illegal Dumping Enforcement
- Improved Trash Bins/Container Management
- Single-Use Carryout Plastic Bag Policies
- Polystyrene Foam Food Service Ware Policies
- Public Education and Outreach Programs
- Volunteer Led Cleanups

Trash Management Area Map ID: LG10-2a (Priority #2)

- Full-Capture Treatment Devices
- Street Sweeping
- On-land Trash Cleanups
- Partial-Capture Treatment Devices
- Enhanced Storm Drain Inlet Maintenance
- Activities to Reduce Trash from Uncovered Loads
- Anti-littering and Illegal Dumping Enforcement
- Improved Trash Bins/Container Management
- Single-Use Carryout Plastic Bag Policies
- Polystyrene Foam Food Service Ware Policies
- Public Education and Outreach Programs
- Volunteer Led Cleanups

Trash Management Area Map ID: LG08-2a (Priority #3)

- Full-Capture Treatment Devices
- Street Sweeping
- On-land Trash Cleanups
- Partial-Capture Treatment Devices
- Enhanced Storm Drain Inlet Maintenance
- Activities to Reduce Trash from Uncovered Loads
- Anti-littering and Illegal Dumping Enforcement
- Improved Trash Bins/Container Management
- Single-Use Carryout Plastic Bag Policies
- Polystyrene Foam Food Service Ware Policies
- Public Education and Outreach Programs

Trash Management Area Map ID: LG03-2b (Priority #4)

- Full-Capture Treatment Devices
- Street Sweeping
- On-land Trash Cleanups
- Partial-Capture Treatment Devices
- Enhanced Storm Drain Inlet Maintenance
- Activities to Reduce Trash from Uncovered Loads
- Anti-littering and Illegal Dumping Enforcement
- Improved Trash Bins/Container Management
- Single-Use Carryout Plastic Bag Policies
- Public Education and Outreach Programs
- Volunteer Led Cleanups

Trash Management Area Map ID: LG11-2b (Priority #5)

- Full-Capture Treatment Devices
- Street Sweeping
- On-land Trash Cleanups
- Partial-Capture Treatment Devices
- Enhanced Storm Drain Inlet Maintenance
- Activities to Reduce Trash from Uncovered Loads

- Anti-littering and Illegal Dumping Enforcement
- Improved Trash Bins/Container Management
- Single-Use Carryout Plastic Bag Policies
- Public Education and Outreach Programs

Trash Management Area Map ID: LG07-2b (Priority #6)

- Full-Capture Treatment Devices
- Street Sweeping
- On-land Trash Cleanups
- Partial-Capture Treatment Devices
- Enhanced Storm Drain Inlet Maintenance
- Activities to Reduce Trash from Uncovered Loads
- Anti-littering and Illegal Dumping Enforcement
- Improved Trash Bins/Container Management
- Single-Use Carryout Plastic Bag Policies
- Polystyrene Foam Food Service Ware Policies
- Public Education and Outreach Programs
- Volunteer Led Cleanups

Trash Management Area Map ID: LG05-2c (Priority #7)

- Full-Capture Treatment Devices
- Street Sweeping
- On-land Trash Cleanups
- Partial-Capture Treatment Devices
- Enhanced Storm Drain Inlet Maintenance
- Activities to Reduce Trash from Uncovered Loads
- Anti-littering and Illegal Dumping Enforcement
- Improved Trash Bins/Container Management
- Single-Use Carryout Plastic Bag Policies
- Public Education and Outreach Programs

Trash Management Area Map ID: LG01-2c (Priority_[NH1] #8)

- Full-Capture Treatment Devices
- Street Sweeping
- On-land Trash Cleanups
- Partial-Capture Treatment Devices
- Enhanced Storm Drain Inlet Maintenance
- Activities to Reduce Trash from Uncovered Loads
- Anti-littering and Illegal Dumping Enforcement
- Improved Trash Bins/Container Management
- Single-Use Carryout Plastic Bag Policies
- Polystyrene Foam Food Service Ware Policies
- Public Education and Outreach Programs
- Volunteer Led Cleanups

Trash Management Area Map ID: LG02-2c (Priority #9)

- Full-Capture Treatment Devices
- Street Sweeping
- On-land Trash Cleanups
- Partial-Capture Treatment Devices
- Enhanced Storm Drain Inlet Maintenance
- Activities to Reduce Trash from Uncovered Loads
- Anti-littering and Illegal Dumping Enforcement
- Improved Trash Bins/Container Management
- Single-Use Carryout Plastic Bag Policies
- Public Education and Outreach Programs
- Volunteer Led Cleanups
- Hot Spot Cleanups

Trash Management Area Map ID: LG04-3 (Priority #10)

- Full-Capture Treatment Devices
- Street Sweeping
- On-land Trash Cleanups
- Partial-Capture Treatment Devices
- Enhanced Storm Drain Inlet Maintenance
- Activities to Reduce Trash from Uncovered Loads
- Anti-littering and Illegal Dumping Enforcement
- Improved Trash Bins/Container Management
- Single-Use Carryout Plastic Bag Policies
- Public Education and Outreach Programs

Trash Management Area Map ID: LG09-3 (Priority #11)

- Full-Capture Treatment Devices
- Street Sweeping
- On-land Trash Cleanups
- Partial-Capture Treatment Devices
- Enhanced Storm Drain Inlet Maintenance
- Activities to Reduce Trash from Uncovered Loads
- Anti-littering and Illegal Dumping Enforcement
- Improved Trash Bins/Container Management
- Single-Use Carryout Plastic Bag Policies
- Polystyrene Foam Food Service Ware Policies
- Public Education and Outreach Programs
- Volunteer Led Cleanups

Trash Management Area Map ID: LG12-4 (Priority #12)

- Full-Capture Treatment Devices
- Street Sweeping
- On-land Trash Cleanups
- Partial-Capture Treatment Devices
- Enhanced Storm Drain Inlet Maintenance
- Activities to Reduce Trash from Uncovered Loads

- Anti-littering and Illegal Dumping Enforcement
- Improved Trash Bins/Container Management
- Single-Use Carryout Plastic Bag Policies
- Polystyrene Foam Food Service Ware Policies
- Public Education and Outreach Programs
- Volunteer Led Cleanups
- Hot Spot Cleanups

3.3 Control Measure Implementation Schedule

The timeline proposed in Table 8 is based on the Town of Los Gatos' current evaluation of Town funds and resources (i.e. Town staff and programs). The timeline may be adjusted as the results of the *Trash Assessment Strategy* described in Section 4.0 are made available, which will further highlight the appropriate control measures to be implemented jurisdictional-wide and in each TMA to achieve FCD equivalency. Additionally, the Town budget is difficult to predict for the duration of the Long-Term Plan as it is dependent on the fluctuating economy and the needs of other Town programs. Therefore, control measure adoption will be strongly dependent on available funding each fiscal year. Any changes to the timeline or control measures to be adopted will be provided in the annual reporting process each fiscal year through 2022.

Table 8. Town of Los Gatos trash control measure implementation schedule.

Trash Management Area and Control Measures	Pre-MRP	Short-Term					Long-Term							
		FY 2009-2010	FY 2010-2011	FY 2011-2012	FY 2012-2013	FY 2013-2014 ^a	FY 2014-2015	FY 2015-2016	FY 2016-2017 ^b	FY 2017-2018	FY 2018-2019	FY 2019-2020	FY 2020-2021	FY 2021-2022 ^c
Control Measures														
Full-Capture Treatment Devices				X	X	X	X	X	X	X	X	X	X	X
Street Sweeping	X	X	X	X	X	X	X	X	X	X	X	X	X	X
On-land Trash Cleanups	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Partial-Capture Treatment Devices	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Enhanced Storm Drain Inlet Maintenance		X	X	X	X	X	X	X	X	X	X	X	X	X
Activities to Reduce Trash from Uncovered Loads	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Anti-littering and Illegal Dumping Enforcement	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Improved Trash Bins/Container Management	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Single-Use Carryout Plastic Bag Policies						X	X	X	X	X	X	X	X	X
Polystyrene Foam Food Service Ware Policies					X	X	X	X	X	X	X	X	X	X
Public Education and Outreach Programs	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Creek and Shoreline Hot Spot Cleanups														
Volunteer Led Cleanups	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Hot Spot Cleanups		X	X	X	X	X	X	X	X	X	X	X	X	X

^aJuly 1, 2014 40% trash reduction target

^bJuly 1, 2014 70% trash reduction target

^cJuly 1, 2022 100% trash reduction target

4.0 PROGRESS ASSESSMENT STRATEGY

Provision C.10.a.ii of the MRP requires Permittees to develop and implement a trash load reduction tracking method that will be used to account for trash load reduction actions and to demonstrate progress and attainment of trash load reduction targets. Early into the MRP, Permittees decided to work collaboratively to develop a trash load reduction tracking method through the Bay Area Stormwater Management Agencies Association (BASMAA). Permittees, Water Board staff, and other stakeholders assisted in developing Version 1.0 of the tracking method. On behalf of all MRP Permittees, the Bay Area Stormwater Management Agencies Association (BASMAA) submitted Version 1.0 to the Water Board on February 1, 2012.

The Trash Assessment Strategy (Strategy) described in this section is intended to serve as Version 2.0 of the trash tracking method and replace version 1.0 previously submitted to the Water Board. The Strategy is specific to Permittees participating in the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP), including the Town of Los Gatos. The Town intends to implement the Strategy in phases and at multiple geographical scales (i.e., jurisdiction-wide and trash management area) in collaboration with SCVURPPP. Pilot implementation is scheduled for the near-term and as assessment methods are tested and refined, the Strategy will be adapted into a longer-term approach. The Strategy selected by the Town is described in the following sections.

4.1 SCVURPPP Pilot Assessment Strategy

The following SCVURPPP Pilot Trash Assessment Strategy (SCVURPPP Pilot Strategy) was developed by SCVURPPP on behalf of the Town and other Santa Clara Valley Permittees. The SCVURPPP Pilot Strategy will be implemented at a pilot scale on a countywide basis and includes measurements and observations in the Town of Los Gatos.

4.1.1 Management Questions

The Strategy is intended to answer the following core management questions over time as trash control measures outlined in Permittee Long-term Trash Management Plans are implemented and refined:

- Are the MS4 trash load reduction targets (i.e., 40%, 70%, and No Adverse Impacts) being achieved?
- Are there trash problems in receiving waters (e.g., creeks and rivers)?
- If trash problems in receiving waters exist, what are the important sources and transport pathways?

The SCVURPPP Pilot Strategy, including indicators and methods, is summarized in this section and fully described in the SCVURPPP Pilot Trash Assessment Strategy, a compendium document submitted to the Water Board on February 1, 2014 on behalf of all SCVURPPP Permittees (SCVURPPP 2014).

4.1.2 Indicators of Progress and Success

The management questions listed in the previous section will be addressed by tracking information and collecting data needed to report on a set of key environmental indicators. Environmental indicators are simple measures that communicate what is happening in the environment. Since trash in the environment is very complex, indicators provide a more practical

and economical way to track the state of the environment than if we attempted to record every possible variable.

With regard to municipal stormwater trash management, indicators are intended to detect progress towards trash load reduction targets and solving trash problems. Ideally, indicators should be robust and able to detect progress that is attributable to multiple types of trash control measure implementation scenarios. Assessment results should also provide Permittees with an adequate level of confidence that trash load reductions from MS4s have occurred, while also assessing whether trash problems in receiving waters have been resolved. Indicators must also be cost effective, relatively easy to generate, and understandable to stakeholders.

Primary and secondary indicators that SCVURPPP Permittees will use to answer core management questions include:

Primary Indicators:

- 1-A Reduction in the level of trash present on-land and available to MS4s
- 1-B Effective full capture device operation and maintenance

Secondary Indicators:

- 2-A Successful levels of trash control measures implementation
- 2-B Reductions in the amount of trash in receiving waters

In selecting the indicators above, the Town of Los Gatos in collaboration with SCVURPPP and other SCVURPPP Permittees recognize that no one environmental indicator will provide the information necessary to effectively determine progress made in reducing trash discharged from MS4s and improvements in the level of trash in receiving waters. Multiple indicators were therefore selected.

The ultimate goal of municipal stormwater trash reduction strategies is to reduce the impacts of trash associated with MS4s on receiving waters. Indicators selected to assess progress towards this goal should ideally measure outcomes (e.g., reductions in trash discharged). The primary indicators selected by SCVURPPP are outcome-based and include those that are directly related to MS4 discharges. Secondary indicators are outcome or output-based and are intended to provide additional perspective on and evidence of, successful trash control measure implementation and improvements in receiving water condition with regard to trash.

As described in Section 2.2, trash is transported to receiving waters from pathways other than MS4s, which may confound our ability to observe MS4-associated reductions in creeks and shorelines. Due to this challenge of linking MS4 control measure implementation to receiving water conditions, the receiving water based indicator is currently considered a secondary indicator. Evaluations of data on the amount of trash in receiving waters that are conducted over time through the Pilot Assessment Strategy will assist the Town in further determinations of the important sources and pathways causing problems in local creeks, rivers, and shorelines.

4.1.3 Pilot Assessment Methods

This section briefly summarizes the preliminary assessment methods that the Town of Los Gatos will implement through the SCVURPPP Pilot Strategy to generate indicator information described in the previous section. Additional information on each method can be found in the

SCVURPPP Pilot Trash Assessment Strategy submitted to the Water Board by SCVURPPP on behalf of the Town.

1-A. On-land Visual Assessments

As part of the Trash Generation Map assessment and refinement process (see Section 2.3.1), a draft on-land visual assessment method was developed to assist Permittees in confirming and refining trash generating area designations (i.e., very high, high, moderate and low trash generating categories). The draft on-land visual assessment method is intended to be a cost-effective tool and provide Permittees with a viable alternative to quantifying the level of trash discharged from MS4s. As part of BASMAA’s *Tracking California’s Trash* grant received from the State Water Resources Control Board (see Section 4.2), quantitative relationships between trash loading from MS4s and on-land visual assessment condition categories will be established. Condition categories defined in the draft on-land assessment protocol are listed in Table 9

Table 9. Trash condition categories used in the draft on-land visual assessment protocol.

Trash Condition Category	Summary Definition
A (Low)	Effectively no trash is observed in the assessment area.
B (Moderate)	Predominantly free of trash except for a few pieces that are easily observed.
C (High)	Trash is widely/evenly distributed and/or small accumulations are visible on the street, sidewalks, or inlets.
D (Very High)	Trash is continuously seen throughout the assessment area, with large piles and a strong impression of lack of concern for trash in the area.

On-land visual assessments will be conducted in trash management areas within the Town of Los Gatos as part of the SCVURPPP Pilot Trash Assessment Strategy. On-land assessments are intended to establish initial conditions and detect improvements in the level of trash available to MS4s over time. More specifically, on-land visual assessment methods will be conducted in areas not treated by trash full capture devices in an attempt to evaluate reductions associated with other types of control measures. Assessment methods for areas treated by full capture devices are described in this next section.

Given that the on-land assessment method and associated protocol have not been fully tested and refined, initial assessments will occur at a pilot scale in the Town and in parallel to the *Tracking California’s Trash* project. The frequency of assessments and number of sites where assessments will occur during the pilot stage are more fully described in the SCVURPPP Pilot Trash Assessment Strategy (SCVURPPP 2014).

1-B. Full Capture Operation and Maintenance Verification

Consistent with the MRP, adequate inspection and maintenance of trash full capture devices is required to maintain full capture designation by the Water Board. The Town of Los Gatos is currently developing an operation and maintenance verification program (Trash O&M Verification Program), via SCVURPPP, to ensure that devices are inspected and maintained at a level that maintains this designation.

The SCVURPPP Trash O&M Verification Program will be modeled on the current O&M verification program for stormwater treatment controls implemented consistent with the Permit and redevelopment requirements. Additional details regarding the Trash O&M Verification Program can be found in the SCVURPPP Pilot Trash Assessment Strategy (SCVURPPP 2014).

2-A. Control Measure Effectiveness Evaluations

In addition to on-land trash assessments and full capture operation and maintenance verification, the Town will also conduct assessments of trash control measures implemented within their jurisdictional area. Assessment methods will be selected based on trash sources and the type of control measure being implemented. Control measure effectiveness evaluations are more fully described in the SCVURPPP Pilot Trash Assessment Strategy. The following are example assessment methods that may be used to demonstrate successful control measure implementation and progress towards trash reduction targets:

- Product-related Ordinances – Descriptions of outreach efforts, tracking and reporting business compliance rates, or other metrics of control measure performance.
- Street Sweeping- Identification sweeping frequency and the ability to sweep to the curb by primary TMA, including any enhancements that have been implemented; and any other metrics demonstrating the enhanced performance of street sweeping.
- Public/Private Trash Container Management - Descriptions of control measures implemented to prevent overflowing trash containers or promoting the more effective use of public/private bins, including any new or enhancements to existing actions; and any other metrics demonstrating the performance of the control measure.
- Public Outreach and Education – Descriptions of outreach and education actions specific to trash reduction, including the number of events conducted within the municipality; descriptions of effectiveness measurements, including the results of pre- and post-implementation surveys or other metrics.
- On-land Cleanups and Enforcement – Descriptions of on-land cleanup actions, including any enhancements that have been implemented; identification of whether on-land cleanups are Permittee or volunteer-led; or other metrics of control measure performance.
- Storm Drain Inlet Maintenance – Descriptions of the level of maintenance, including any enhancement to maintenance frequency; the numbers of inlets where enhanced maintenance is being implemented; and any other metrics demonstrating the performance of inlet maintenance.
- Anti-littering and Illegal Dumping Prevention/Enforcement - Descriptions of control

measures implemented to prevent littering and illegal dumping, including any new actions or enhancements to existing actions; descriptions and results of enhanced enforcement actions; and any other metrics demonstrating the performance of the control measure.

- Prevention of Uncovered Loads - Descriptions of control measures implemented to prevent trash dispersion from uncovered loads, including any new or enhancements to existing actions; descriptions and results of enhanced enforcement actions; and any other metrics demonstrating the performance of the control measure.
- Partial Capture Devices – Descriptions, numbers and types of devices implemented; maintenance frequencies by device or groups of devices; and any other metrics demonstrating the partial capture device performance.
- Other Control Measures - Descriptions of control measures implemented to prevent or intercept trash before discharge to receiving waters, and any other metrics demonstrating the performance of the control measure.

2-C. Receiving Water Condition Assessments

The ultimate goal of stormwater trash management in the Bay Area is to significantly reduce the amount of trash found in receiving waters. In the last decade, Santa Clara Valley Permittees and volunteers have collected data on the amounts of trash removed during cleanup events. More recently, Permittees have conducted trash assessments in creek and shoreline hotspots using standardized assessment methods. In an effort to answer the core management question *Have trash problems in receiving waters been resolved?*, the Town of Los Gatos plans to continue conducting receiving water condition assessments at trash hot spots a minimum of one time per year. Assessment will be conducted consistent with Permit hot spot cleanup and assessment requirements. Additional information on receiving water assessment methods can be found in the SCVURPPP Pilot Trash Assessment Strategy (SCVURPPP 2014).

4.2 BASMAA “Tracking California’s Trash” Project

The SCVURPPP Pilot Assessment Strategy described in the previous section recognizes that outcome-based trash assessment methods needed to assess progress toward trash reduction targets are not well established by the scientific community. In an effort to address these information gaps associated with trash assessment methods, the Bay Area Stormwater Management Agencies Association (BASMAA), in collaboration with SCVURPPP, the 5 Gyres Institute, San Francisco Estuary Partnership, the City of Los Angeles, and other stormwater programs in the Bay Area, developed the *Tracking California’s Trash* Project. The Project is funded through a Proposition 84 grant awarded to BASMAA by the State Water Resources Control Board (SWRCB) who recognized the need for standardized trash assessment methods that are robust and cost-effective.

The Project is intended to assist BASMAA member agencies in testing trash assessment and monitoring methods needed to evaluate trash levels in receiving waters, establish control measures that have an equivalent performance to trash full capture devices, and assess progress in trash reduction over time. The following sections provide brief descriptions of tasks that BASMAA will conduct via the three-year Project. Full descriptions of project scopes, deliverables, and outcomes will be developed as part of the task-specific Sampling and Analysis Plans required by the SWRCB during the beginning of the Project. The Project is currently underway and will continue through 2016.

4.2.1 Testing of Trash Monitoring Methods

BASMAA and the 5 Gyres Institute will evaluate the following two types of assessment methods as part of the Project:

- **Trash Flux Monitoring** – Trash flux monitoring is intended to quantify the amount of trash flowing in receiving waters under varying hydrological conditions. Flux monitoring will be tested in up to four receiving water bodies in San Francisco Bay and/or the Los Angeles areas. Methods selected for evaluation and monitoring will be based on a literature review conducted during this task and through input from technical advisors and stakeholders. Monitoring is scheduled to begin in 2014 and will be completed in 2016.
- **On-land Visual Assessments** – As part of the Project, BASMAA will also conduct an evaluation of on-land visual assessment methods that are included in the SCVURPPP Pilot Assessment Strategy. The methods are designed to determine the level of trash on streets and public right-of-ways that may be transported to receiving waters via MS4s. BASMAA plans to conduct field work associated with the evaluation of on-land visual assessment at a number of sites throughout the region. To the extent practical, sites where the on-land methods evaluations take place will be coordinated with trash flux monitoring in receiving waters. On-land assessments will occur in areas that drain to trash full capture devices, and all sites will be assessed during wet and dry weather seasons in order to evaluate on-land methods during varying hydrologic conditions. Monitoring is scheduled to begin in 2014 and will be completed in 2016.

4.2.2 Full Capture Equivalent Studies

Through the implementation of BASMAA's *Tracking California's Trash* grant-funded project, a small set of "Full Capture Equivalent" projects will also be conducted in an attempt to demonstrate that specific combinations of control measures will reduce trash to a level equivalent to full capture devices. Initial BMP combinations include high-frequency street sweeping, and enhanced street sweeping with auto-retractable curb inlet screens. Other combinations will also be considered. Studies are scheduled to begin in 2014 and will be completed in 2016.

4.3 Additional Progress Assessments

The Town of Los Gatos will continue to improve upon its already robust response rate program for reported trash and illegal dumping violations that are typically cleaned up within 24 business hours by Town staff. Funding and staff time permitting, the Town will consider improvements to reporting response calls and monitoring for trash and illegal dumping hot spots that may require enhanced control measures such as outreach, physical barriers, and increased cleanups or monitoring.

4.4 Long-Term Assessment Strategy

The Town of Los Gatos is committed to implementing standardized assessment methods post-2016 based on the lessons learned from pilot assessments and studies that will occur between 2014 and 2016. Assessment activities described in the previous sections will evaluate the utility of different assessment methods to demonstrate progress towards trash reduction targets and provide recommended approaches for long-term implementation. Lessons learned will be submitted to the Water Board with the FY 2015-2016 Annual Report and a revised Strategy will be developed and submitted, if necessary. The revised Strategy will include agreed upon

assessment methods that will be used to demonstrate progress during the remaining term of trash reduction requirements. Reporting using the new/revised methods will begin with the FY 2016-17 Annual Report.

4.5 Implementation Schedule

The implementation schedule for the SCVURPPP Pilot Implementation Strategy, BASMAA’s Tracking California’s Trash project, and the Long-Term Assessment Strategy are included in Table 10. Load reduction reporting milestones are also denoted in the table. The schedule is consistent with the need for near-term pilot assessment results to demonstrate progress toward short-term targets, while acknowledging the need for testing and evaluation of assessment methods and protocols prior to long-term implementation. For more detailed information on implementation timelines, refer to the SCVURPPP Pilot Trash Assessment Strategy (SCVURPPP 2014) and monitoring plans developed as part of BASMAA’s Tracking California’s Trash project.

Table 10. Town of Los Gatos trash progress assessment implementation schedule.

Trash Assessment Programs and Methods	Prior to FY 2013-	Fiscal Year								
		2013-14 ^a	2014-15	2015-16	2016-17 ^b	2017-18	2018-19	2019-20	2020-21	2021-22 ^c
Pilot Trash Assessment Strategy (SCVURPPP)										
On-land Visual Assessments										
Initial (Baseline) Assessments	X									
Pilot Progress Assessments		X	X	X	X					
Full Capture Operation and Maintenance Verification			X	X	X					
Control Measure Effectiveness Evaluations	X	X	X	X	X					
Receiving Water Condition Assessments	X	X	X	X	X					
Tracking California’s Trash Project (BASMAA)										
Testing of Trash Monitoring Methods										
Trash Flux Monitoring Protocol Testing			X	X	X					
On-land Visual Assessment Evaluations			X	X	X					
Full Capture Equivalent Studies			X	X	X					
Long-Term Trash Assessment Strategy (SCVURPPP)						X	X	X	X	X

^a July 1, 2014 40% trash reduction target

^b July 1, 2014 70% trash reduction target

^c July 1, 2022 100% trash reduction target

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