

# Baseline Trash Load and Short-Term Trash Load Reduction Plan

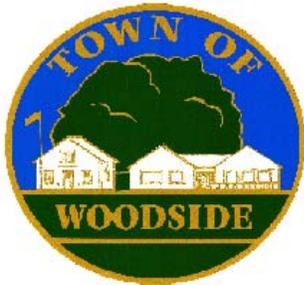
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**Submitted by:**

**Town of Woodside**

**2955 Woodside Road**

**Woodside, CA 94062**



*In compliance with Provisions C.10.a(i) and C.10.a(ii) of Order R2-2009-0074*

**January 26, 2012**

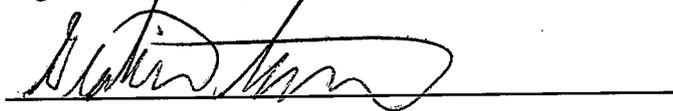
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**Town of Woodside**  
**SHORT-TERM TRASH LOAD REDUCTION PLAN**

**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:**



Gratien Etchebehere  
Community Preservation Officer

January 26, 2012

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## 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
GIS	Geographic Information System
MRP	Municipal Regional Stormwater NPDES Permit
MS4	Municipal Separate Storm Sewer System
NGO	Non-Governmental Organization
NPDES	National Pollutant Discharge Elimination System
Q	Flow
SFRWQCB	San Francisco Regional Water Quality Control Board
SWRCB	State Water Resource Control Board
TMDL	Total Maximum Daily Load
USEPA	United States Environmental Protection Agency
Water Board	San Francisco Regional Water Quality Control Board
WDR	Waste Discharge Requirements

## **PREFACE**

This Baseline Trash Load and Short-Term Trash Load Reduction Plan (Plan) is submitted in compliance with provision C.10.a(i) and C.10.a(ii) of the Municipal Regional Stormwater NPDES Permit (MRP) for Phase I communities in the San Francisco Bay (Order R2-2009-0074). This Plan was developed using a regionally consistent format developed by the Bay Area Stormwater Management Agencies Association (BASMAA). Based on new information that becomes available during the implementation of this Short-Term Plan (e.g., revisions to baseline loading estimates or load reduction credits of quantification formulas), the Town of Woodside may choose to amend or revise this Plan. If revisions or amendments are necessary, a revised Short-Term Plan will be submitted to the Water Board via the Town of Woodside's annual reporting process.

## 1.0 INTRODUCTION

The Municipal Regional Stormwater 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 of the MRP (Trash Load Reduction) requires Permittees to reduce trash from their Municipal Separate Storm Sewer Systems (MS4s) by 40 percent before July 1, 2014.

Required submittals to the San Francisco Bay Regional Water Quality Control Board (Water Board) by February 1, 2012 under MRP provision C.10.a (Short-Term Trash Loading Reduction Plan) include:

1. (a) Baseline trash load estimate, and (b) description of the methodology used to determine the load level.
2. A description of the 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 levels.
3. A **Short-Term Trash Loading Reduction Plan** that describes control measures and best management practices that will be implemented to attain a 40 percent trash load reduction from its MS4 by July 1, 2014;

This Short-Term Trash Load Reduction Plan (Short-Term Plan) is submitted by the Town of Woodside in compliance with the portions of MRP provision C.10.a.i listed as 1a and 3 above. In compliance with 1b, BASMAA submitted a progress report on behalf of Permittees that briefly describes the methodologies used to develop trash baseline loads (BASMAA 2011a). These methods are more fully described in BASMAA (2011b, 2011c). Lastly, the *Trash Load Reduction Tracking Method Technical Report* (BASMAA 2011d) was submitted by BASMAA on behalf of Permittees in compliance with submittal 2 described above. The Baseline Loading Rates and Tracking Method projects are briefly described below.

### Baseline Trash Generation Rates Project

Through approval of a BASMAA regional project, Permittees agreed to work collaboratively to develop a regionally consistent method to establish baseline trash loads from their MS4s. The project, also known as the *BASMAA Baseline Trash Generation Rates Project* assists Permittees in establishing a baseline to demonstrate progress towards MRP trash load reduction goals (i.e., 40 percent). The intent of the project was to provide a scientifically-sound method for developing (default) baseline trash generation rates that can be adjusted, based on Permittee/site specific conditions; and used to develop baseline loading rates and loads. Baseline loads form the reference point for comparing trash load reductions achieved through control measure implementation.

Baseline trash loading rates are quantified on a volume per unit area basis and based on factors that significantly affect trash generation (e.g., land use, population density, and economic profile). The method used to establish baseline trash loads 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 off a conceptual model developed as an outgrowth of these studies (BASMAA 2011b). Baseline trash loading 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. Methods used to develop trash baseline loading rates are more fully described in BASMAA (2011b, 2011c, and 2012b).

## Trash Load Reduction Tracking Method Summary

The trash load reduction tracking method, described in the *Trash Load Reduction Tracking Method Technical Report*, assists Permittees in demonstrating progress towards reaching trash load reduction goals defined in the MRP (e.g., 40 percent). The tracking method is based on information gained through an extensive literature review and Permittee experiences in implementing stormwater control measures in the San Francisco Bay Area. The literature review was conducted to evaluate quantification methods used by other agencies to assess control measure effectiveness or progress towards quantitative goals. Results are documented in the *Trash Load Reduction Tracking Method: Technical Memorandum # 1 – Literature Review* (BASMAA 2011d).

Methods attributable to specific trash control measures fall into two categories: 1) trash load reduction quantification formulas; and 2) load reduction credits (BASMAA 2012a). Quantification formulas were developed for those trash control measures that were deemed feasible and practical to quantify load reductions at this time. Load reduction credits were developed for all other control measures included in the methodology development. Both categories of methods assume that as new or enhanced trash control measures are implemented by Permittees, a commensurate trash load reduction will occur. Progress towards load reduction goals will be demonstrated through comparisons to established trash baseline load estimates developed through the BASMAA *Baseline Generation Rates Project*.

## Short-Term Trash Load Reduction Plan

The purpose of this Short-Term Plan is to describe the current level of implementation of control measures and best management practices, and identify the type and extent to which new or enhanced control measures and best management practices will be implemented to attain a 40 percent trash load reduction from their MS4 by July 1, 2014. The Short-Term Plan was developed using a template created by BASMAA through a regional project. New and enhanced trash control measures (i.e., Best Management Practices) that Permittees may implement to demonstrate trash load reduction goals are included in Table 1.1. This list was developed collaboratively through the BASMAA Trash Committee, which included participation from Permittee, stormwater program, Water Board and non-governmental organization (NGO) staff. The list of control measures is based on: 1) the potential for Permittees to implement; 2) the availability of information required to populate formulas and develop credits; and 3) the expected benefit of implementation. Load reductions associated with each control measure are demonstrated either through a quantification formula (QF) or credits (CR) described in the *Trash Load Reduction Tracking Method Technical Report* (BASMAA 2012a).

In efforts to reduce trash discharged from MS4s, Permittees may choose to implement control measures that are not included in Table 1.1 or described more fully in BASMAA (2012a). If a Permittee chooses to do so, methods specific to calculating trash load reductions for that control measure would need to be developed. Additionally, at that point, consideration should be given to updating this Short-Term Plan.

Additionally, based on new information that becomes available during the implementation of this Short-Term Plan (e.g., revisions to baseline loading estimates or load reduction credits of quantification formulas), the Town of Woodside may amend or revise this Plan. If revisions or amendments are

necessary, a revised Short-Term Plan will be submitted to the Water Board via the Town of Woodside’s annual reporting process.

**Table 1.1. Trash control measures for which load reduction quantification credits or formulas were developed to track progress towards trash load reduction goals.**

<b>Load Reduction Credits</b>
Public Education and Outreach Programs
Activities to Reduce Trash from Uncovered Loads
Anti-Littering and Illegal Dumping Enforcement Activities
<b>Quantification Formulas</b>
On-land Trash Pickup (Volunteer and/or Municipal)
Enhanced Street Sweeping
Enhanced Storm Drain Inlet Maintenance
Creek/Channel/Shoreline Cleanups (Volunteer and/or Municipal)

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

- Introduction;
- Trash Baseline Load Estimate;
- Load Reduction Calculation Process
- Planned Implementation of New or Enhanced Control Measures;
- Implementation Schedule; and
- References

## 2.0 BASELINE TRASH LOADING ESTIMATE

**Note:** In this section, a set of default trash generation rates and estimated trash baseline loads are presented. Generation rates were developed via a BASMAA regional collaborative project and should be considered preliminary. Although to-date BASMAA has attempted to develop rates that are applicable to all municipalities in the San Francisco Bay Area, preliminary rates and baseline loads presented within this section are not believed to be fully representative of trash discharged from the Town of Woodside's municipal separate storm sewer system (MS4). It is our understanding that BASMAA will continue to refine trash generation rates during the completion of its *Trash Baseline Generation Rates Project* in 2012 and attempt to develop refined generation rates that may be more applicable to the Town of Woodside. If the City deems that these refined generation rates are applicable, these refined rates will be used to revise trash baseline loads presented in this section. If BASMAA is unable to develop refined generation rates that are applicable to the Town of Woodside, then the Town may individually or in collaboration with other similar cities, develop city-specific generation rates and revise baseline load estimates presented in this section accordingly.

This section provides the estimated annual trash baseline load from the Town of Woodside's Municipal Separate Storm Sewer System (MS4). In compliance with Provision C.10.a.ii of the MRP, the Town of Woodside worked collaboratively with other MRP Permittees through BASMAA to develop data and the process necessary to establish baseline trash loading estimate from our MS4. The collaborative project was managed through the BASMAA Trash Committee and included a series of steps described in BASMAA (2012b) and listed below. The approach was intended to be cost-effective and consistent, but still provide an adequate level of confidence in trash loads from MS4s, while acknowledging that uncertainty in trash loads still exists. The approach entailed the following steps:

1. Conduct literature review;
2. Develop conceptual model;
3. Develop and implement sampling and analysis plan;
4. Test conceptual model;
5. Develop and apply default trash **generation rates** to Permittee effective loading areas;
6. Adjust default trash generation rates based on baseline levels of control measure implementation by the Permittee to develop trash **baseline loading rates**; and,
7. Calculate Permittee-specific annual trash **baseline load**.

Through the collaborative BASMAA project, default baseline trash generation rates (volume per area) were developed for a finite set of categories, based on factors that significantly affect trash loads (e.g., land use). These trash generation rates were then applied to effective loading areas in applicable jurisdictional areas within the Town of Woodside. Trash generation rates were then adjusted based on baseline street sweeping, storm drain inlet maintenance, and stormwater pump station maintenance conducted in each applicable area. The sum of the trash loads (i.e., rate multiplied by area) from each effective loading area represents the Town of Woodside's baseline trash load from its MS4. A full description of the methods by which trash baseline loads were developed is included in BASMAA (2012a) and is summarized below.

### Permittee Characteristics

Incorporated in 1956, the Town of Woodside covers 7,447 acres in San Mateo County, and has a jurisdictional area of 6,226 acres. According to the 2010 Census, it has a population of 5,287, with a

population density of 450.6 people per square mile, and average household size of 2.67. Of the 5,287 who call the Town of Woodside home, 23.5% are under the age of 18, 4.6% are between 18 and 24, 15.6% are between 25 and 44, 36.1% are between 45 and 65, and 20.2% are 65 or older.

The Town of Woodside is mostly residential but the small downtown area features a few restaurants, a grocery store, a hardware store, an art gallery and framing shop, a home and garden store, realtors, a dry cleaner, and a United States Post Office. The median household income was \$171,126 in 2000<sup>1</sup>.

### Default Trash Generation Rates (Regional Approach)

A set of default trash generation rates was developed via the BASMAA regional collaborative project (BASMAA 2012a). Default generation rates were developed based on a comparison between trash characterization monitoring results, land uses, economic profiles, and other factors that were believed to possibly affect trash generation. Three trash characterization monitoring events were scheduled via the *Trash Generation Rates Project*. Due to the compliance timeline in the MRP, only two of three trash characterization monitoring events were used to develop trash generation rates described in BASMAA (2012a) and presented in this section. Following the completion of the third characterization event (Winter 2011/12), this section of the Short-Term Plan may be updated to reflect the most up-to-date trash generation and loading rates available. Trash generation rates based on the results of two of the three characterization events are shown in Table 2-1 for each trash loading category.

**Table 2-1. Regional Default Annual Trash Generation Rates by Land Use Category.**

Land Use Category	Generation Rates (Gallons/Acre)
Retail and Wholesale	29.99
High Density Residential	17.04
K-12 Schools	13.14
Commercial and Services/ Heavy, Light and Other Industrial	7.08
Urban Parks	2.14
Low Density Residential	1.25
Rural Residential	0.17

### Jurisdictional and Effective Loading Areas

Default trash baseline generation rates presented in Table 2-1 were applied to effective loading areas with **jurisdictional areas** within the Town of Woodside. The Town of Woodside’s jurisdictional areas includes all urban land areas within the Town of Woodside boundaries that are subject to the requirements in the MRP. Land use areas identified by a combination of the ABAG 2005 land use dataset and Permittee knowledge that were not included within the Town’s jurisdictional areas include:

- Federal and State of California Facilities and Roads (e.g., Interstates, State Highways);

<sup>1</sup> From the 2000 Census. The median household income for the Town of Woodside from the 2010 Census is not currently available.

## Town of Woodside

- Roads Owned and Maintained by Santa Mateo County;
- Colleges and Universities (Private or Public);
- Non-urban Land Uses (e.g., agriculture, forest, rangeland, open space, wetlands, water);
- Communication or Power Facilities (e.g., PG & E Substations);

Once the Town of Woodside's jurisdictional area was delineated, an effective trash loading area was developed by creating a 200-foot buffer around all streets within the Town's jurisdictional area. The purpose of the effective loading area is to eliminate land areas not directly contributing trash to the Town's MS4 (e.g., large backyards and rooftops). Both the jurisdictional and the effective loading areas for the Town of Woodside are presented in Table 2-2.

**Table 2-2. Jurisdictional areas and effective loading areas in the Town of Woodside by land use classes identified by ABAG (2005).**

Land Use Category	Jurisdictional Area (Acres)	Effective Loading Area (Acres)	% of Effective Loading Area
High Density Residential	1	1	0
Low Density Residential	492	324	12
Rural Residential	5,386	2,307	83
Commercial and Services/ Heavy, Light and Other Industrial	57	22	1
Retail and Wholesale	4	4	0
K-12 Schools	119	22	1
Urban Parks	167	115	4
<b>TOTAL</b>	<b>6,226</b>	<b>2,795</b>	<b>100%</b>

## Permittee-Specific Baseline Trash Loading Rates

Regional default trash generation rates developed through the BASMAA regional collaborative project were applied to effective loading areas within the Town of Woodside based on identified land uses. These generation rates were then adjusted based on the calculated effectiveness of baseline street sweeping, storm drain inlet maintenance and pump station maintenance implemented by the Town. These adjustments were conducted in GIS due to the site specificity of baseline generation rates and baseline control measure implementation. The following sections describe the baseline level of implementation for these three control measures. A summary of trash baseline generation and loading rates for the Town of Woodside are provided in Table 2-3 and areas associated with these rates are illustrated in Figure 2-1.

### **Baseline Street Sweeping**

A "baseline" street sweeping program is defined as the sweeping frequency and parking enforcement implemented by the Town of Woodside prior to effective date of the MRP. Baseline street sweeping differs from "enhanced" street sweeping, which includes increased parking enforcement and/or sweeping conducted at a frequency greater than baseline ceiling (i.e., once per week for retail land uses

and twice per month for all other land uses). The baseline ceiling was created to not penalize implementers of enhanced street sweeping programs prior to the effective date of the MRP. For those Permittees that sweep less frequent than the baseline ceiling, their current sweeping frequency serves as their baseline.

The Town of Woodside's baseline street sweeping program includes sweeping Canada Road and Whiskey Hill Road twice per month. All other roads within the Town are not swept. Parking is not allowed on any street that is swept. The estimated trash load reduced via baseline street sweeping is presented in Table 2-3.

**Baseline Storm Drain Inlet Maintenance**

Within the Town, storm drain inlets were cleaned at a baseline level of one time per year prior to the effective date of the MRP. Based on this baseline frequency and the effectiveness rating developed in BASMAA (2012b), the baseline storm drain maintenance program in the Town of Woodside has an annual effectiveness rating of 5%. The estimated trash load reduced via baseline storm drain inlet maintenance is presented in Table 2-3.

**Baseline Stormwater Pump Station Maintenance**

The Town of Woodside does not own stormwater pump stations with trash racks.

**Baseline Trash Loading Estimate**

The estimated baseline trash load from the Town of Woodside was calculated as the sum of the loads from the Town’s effective loading area, adjusted for baseline implementation of street sweeping, storm drain inlet maintenance, and pump station maintenance. The preliminary annual trash baseline load for the Town of Woodside is presented in Table 2-3. Preliminary baseline trash loading rates are presented in Figure 2-1 to provide a geographical illustration of areas with estimated low, moderate, high and very high trash loading rates.

**Table 2-3. Preliminary annual trash baseline load for the Town of Woodside.**

Category	Annual Load (gallons)
Preliminary Generation Trash Load	1,629
Load Removed via Baseline Street Sweeping	55
Load Removed via Baseline Storm Drain Inlet Maintenance	79
Load Removed via Baseline Stormwater Pump Station Maintenance	0
<b>Preliminary Trash Baseline Load</b>	<b>1,496</b>

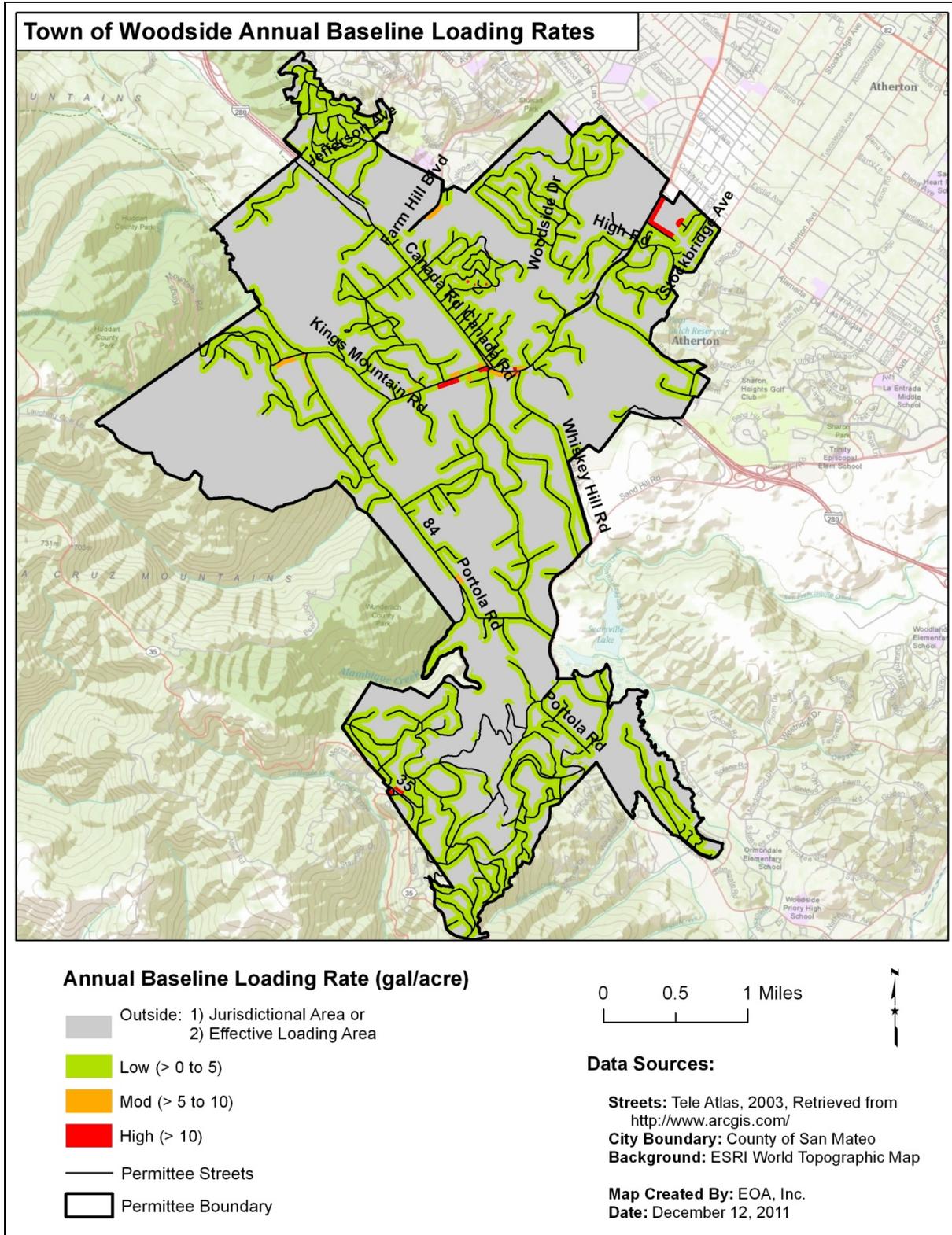


Figure 2-1. Estimated trash baseline loading rates for geographical areas in the Town of Woodside.

### 3.0 LOAD REDUCTION CALCULATION PROCESS

Using the guiding principles and assumptions described BASMAA (2012a), a stepwise process for calculating trash load reductions was developed collaboratively through BASMAA. This process is fully described in Trash Load Reduction Tracking Method Technical Report (BASMAA 2012a) and is briefly summarized in this section. The process takes into at what point in the trash generation and transport process a trash control measure: 1) prevents trash generation, 2) intercepts trash in the environment prior to reaching a water body, or 3) removes trash that has reached a water body. In doing so, it avoids double-counting of trash load reductions associated with specific control measures.

To demonstrate trash load reductions, baseline trash loading rates will be adjusted using the following process:

- Step #1:** Existing Enhanced Street Sweeping
- Step#2:** Trash Generation Reduction
- Step #3:** On-land Interception
- Step #4:** Trash Interception in the Stormwater Conveyance System
- Step #5:** Trash Interception in Waterways
- Step #6:** Comparison to Baseline Trash Load

Reductions calculated in Steps 2 and 5 are assumed to be implemented at a constant rate on an “area-wide” basis. For example, if a new region-wide public education strategy is implemented within the San Francisco Bay area, all Permittees can apply load reduction credits associated with this control measure. In contrast, Steps 1, 3 and 4 are “area-specific” reductions that only apply to specific areas within a Permittee’s jurisdiction. Area-specific control measures include full-capture treatment devices and enhanced street sweeping. Area-specific reductions may require the use of a Geographic Information System (GIS) to calculate.

Reductions are generally applied in the sequence described below, although some reductions may be applied “in-parallel” and calculated during the same sub-step in the process.

#### **Step #1: Existing Enhanced Street Sweeping**

Trash load reductions due to existing enhanced street sweeping implemented prior to the effective date of the MRP and conducted at levels above baseline levels are not incorporated into each Permittee’s trash baseline load. Therefore, load reductions associated with existing enhanced are accounted for first in the trash load reduction calculation process. Existing enhanced street sweeping includes street sweeping conducted at a frequency greater than **1x/week** for streets within retail land use areas or greater than **2x/month** for streets in all other land use areas. The result of adjustments made to trash baseline loads due to the implementation of existing enhanced street sweeping is a set of **current baseline loading rates** and a **current baseline load**.

## Step #2: Trash Generation Reduction Control Measures

Trash generation reduction control measures prevent or greatly reduce the likelihood of trash from being deposited onto the urban landscape. They include the following area-wide control measures:

- CR-1: Single-Use Carryout Plastic Bag Ordinances
- CR-2: Polystyrene Foam Food Service Ware Ordinances
- CR-3: Public Education and Outreach Programs
- CR-4: Reduction of Trash from Uncovered Loads
- CR-5: Anti-Littering and Illegal Dumping Enforcement
- CR-6: Improved Trash Bin/Container Management
- CR-7: Single-Use Food and Beverage Ware Ordinances

Load reductions associated with trash generation reduction control measures are applied on an area-wide basis.<sup>2</sup> Therefore, reductions in current baseline loading rates are adjusted uniformly based on the implementation of the control measure and the associated credit claimed.

Baseline loading rate adjustments for all generation reduction controls measures implemented may be applied in-parallel, but should be applied prior to calculating on-land interception measures discussed in Step #3. The result of adjustments to trash baseline loading rates due to the implementation of these enhanced control measures will be a set of **street loading rates**. The **street load** is the volume of trash estimated to enter the environment and available for transport to the MS4 if not intercepted via on-land control measures described in Step #3.

## Step #3: On-land Interception Control Measures

Once trash enters the environment, it may be intercepted and removed through the following control measures prior to reaching the stormwater conveyance system:

- QF-1: On-land Trash Cleanups (Volunteer and/or Municipal) (Area-wide)
- QF-2: Enhanced Street Sweeping (Area-specific)

Since on-land trash cleanups can affect the amount of trash available to street sweepers, load reductions associated with their implementation will be quantified first, followed by street sweeping enhancements. On-land trash cleanups will be applied as an area-wide reduction and all effective loading rates will be adjusted equally. Enhanced street sweeping, however, is an area-specific control measure and only those effective loading rates associated with areas receiving enhancements will be adjusted. Due to the spatial nature of enhanced street sweeping, GIS may be needed to conduct this step.

The result of adjustments to effective loading rates due to the implementation of these enhanced control measures will be a set of **conveyance system loading rates**. The **conveyance load** is the volume of trash estimated to enter the stormwater conveyance system (e.g., storm drains).

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<sup>2</sup> The only exception to this statement are load reductions associated with the establishment of Business Improvement Districts (BIDs) or equivalent, which are specific to geographic areas and considered "area-specific".

### Step #4: Control Measures that Intercept Trash in the MS4

Control measures that intercept trash in the stormwater conveyance system are area-specific. Therefore, they only apply to land areas and associated trash loads reduced. Conveyance system loading rates developed as a result of Step #3 should be adjusted in-parallel for the following control measures:

- QF-4: Enhanced Storm Drain Inlet Maintenance (Area-specific)
- QF-5: Full-Capture Treatment Devices (Area-specific)

Load reductions for these control measures are calculated in-parallel because they are applied to independent geographical areas. Reductions from all control measures described in this step are area-specific and may require the use of GIS to calculate a set of **waterway loading rates**. Once waterway loading rates have been determined, a **waterway load** will be developed and used as a starting point for calculating load reductions associated with trash interception in waterways discussed in Step #5.

### Step #5: Control Measures that Intercept Trash in Waterways

The load of trash that passes through the stormwater conveyance system without being intercepted may still be removed through interception in waterways. There are two control measures associated with interception in waterways:

- QF-3c: Partial-capture Treatment Device: Litter Booms/Curtains (Area-wide)
- QF-7: Creek/Channel/Shoreline Cleanups (Volunteer and/or Municipal) (Area-wide)

As these control measures are implemented, load reduction estimates can be calculated in-parallel for these two measures.

### Step #6: Comparison to Baseline Trash Load

Applying the five steps described in the processes above will provide an estimated trash load (volume) remaining after trash control measures are implemented. As depicted in the following equation, the relative percent difference between the baseline load and the load remaining after control measures are implemented is the percent reduction that will be used to assess progress towards MRP trash load reduction goals.

$$\frac{\text{Baseline Load} - \text{Remaining Load}}{\text{Baseline Load}} \cdot 100 = \% \text{ Reduction}$$

## 4.0 ENHANCED TRASH CONTROL MEASURES

This section describes the new or enhanced trash control measures planned for implementation by the Town of Woodside. The enhanced control measures described are designed to reach a 40% reduction by July 1, 2014. New and enhanced control measures that will be implemented by the Town of Woodside include those listed in Table 4.1.

**Table 4.1. Trash control measures that will be implemented by the Town of Woodside to reach the 40% trash load reduction.**

Control Measure
Public Education and Outreach Programs
Activities to Reduce Trash from Uncovered Loads
Anti-Littering and Illegal Dumping Enforcement Activities
On-land Trash Pickup (Volunteer and/or Municipal)
Enhanced Street Sweeping
Enhanced Storm Drain Inlet Maintenance
Creek/Channel/Shoreline Cleanups (Volunteer and/or Municipal)

## CR-3: Public Education and Outreach Programs

Permittees in the San Francisco Bay Area have implemented public education and outreach programs to inform residents about stormwater issues relating to pollutants of concern, watershed awareness and pollution prevention. Public education and outreach efforts include developing and distributing brochures and other print media; posting messages on websites and social networking media (Facebook, Twitter etc.), attending community outreach events, and conducting media advertising. In recent years, some municipal agencies have implemented anti-litter campaigns to increase public awareness about the impacts of litter on their communities and water quality; and to encourage the public to stop littering.

### Baseline Level of Implementation

The Town of Woodside participates in public education and outreach control measures through collaborative efforts with the countywide program, particularly with the community outreach events. These control measures are considered baseline because they were either not related to trash reduction specifically, or they are not planned to be continued during the term of the MRP. New actions or actions started prior to the effective date of the MRP and continued into the future are described under the next section.

### Enhanced Level of Implementation

The Town of Woodside will implement the following public education and outreach control measures prior to July 1, 2014.

#### Litter Reduction Advertising Campaign(s)

##### ***BASMAA Youth Outreach Campaign (Regional)***

Through participation and funding of the regional **BASMAA Youth Outreach Campaign** the Town will implement an outreach campaign designed to reduce littering from the target audience in the Bay Area. The Youth Outreach Campaign was launched in September 2011 (post-MRP effective date) and aims to increase the awareness of Bay Area Youth (ages 16-24) on litter and stormwater pollution issues, and eventually change their littering behaviors. Combining the ideas of Community Based Social Marketing with traditional advertising, the Youth Campaign aims to engage youth to enable the peer-to-peer distribution of Campaign messages. The Campaign will at least run from FY 11-12 through FY 13-14. A brief description of the Campaign activities is provided below:

- Raising Awareness: The Campaign will begin by raising awareness of the target audience on litter and stormwater pollution issues. Partnerships with youth commissions, high schools, and other youth focused organizations will be developed to reach the target audience. Messages targeted to youth will be created and distributed via paid advertising, email marketing, Campaign website and social networking sites (e.g., Facebook and twitter).
- Engage the Youth - The advertisements will encourage the audience to participate in the Youth Campaign by joining a Facebook page, entering a contest, taking an online quiz, etc., and providing their contact information. At the beginning of FY 12-13, a video contest will be launched to get Bay Area youth further involved in the Campaign. An

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online voting system will be used to select the winning entry. Media advertising will be conducted to promote the winning entry.

- Change Behaviors: To move the audience along the behavior change continuum, the Campaign will use electronic platforms such as email marketing and social networking sites to encourage participants to engage in increasingly more difficult behavior changes, such as participating in a clean-up, organizing a clean-up, etc.
- Maintain Engagement: The Campaign will continue to interact with the target audience through email marketing and social media websites.

The Youth Campaign will include a pre and post campaign survey to evaluate the effectiveness of outreach. The pre-campaign survey will be conducted in FY 11-12 and the post campaign survey in FY 13-14. Other evaluation mechanisms, such as website hits, number of youth engaged in the Campaign's social networking website, etc. will also be used to evaluate its effectiveness in increasing awareness and changing behavior.

### **Outreach to School-age Children or Youth**

#### ***Countywide Programs***

Through participation and funding of the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), the Town plans to continue to implement litter reduction outreach to school-age children and youth. SMCWPPP currently oversees two contracts to provide direct outreach to grades K-12 in a school setting on behalf of all permittees. The contract for grades K-5 is currently held by the Banana Slug String Band, which performs a presentation called "We All Live Downstream." Through songs and interactive exercises, the message of not putting anything in the storm drains (including trash) is delivered, along with basic concepts of the water cycle and the impact of pollution on aquatic life. The second contract is held by Rock Steady Science, which presents "Water Pollution Prevention and Your Car" to high school students. A portion of this presentation is dedicated to watershed and storm drain education, and the impact of litter on local creeks and waterways. Both contracts are managed to ensure that schools in each community in the County are reached. For communities without High Schools, the feeder schools in neighboring communities are specifically targeted for presentations. In addition to outreach at the school sites, a number of student activity guides and coloring books related to watershed health and littering are provided to children who attend outreach events. Schools are also directly targeted in promotion of Coastal Cleanup Day.

In addition to the programs described above, *Recycleworks*, a branch of San Mateo County Public Works dedicated to promotion of recycling solid waste, plans to continue to conduct litter reduction activities. These include participating in the green schools program in which a school gets certified by achieving goals set from a menu of categories, one of which is litter reduction. In addition, *Recycleworks* conducts school assemblies and field trips focusing on litter reduction and recycling. They also conduct waste audits at schools to encourage waste reduction, and staff outreach events at schools. PIP is exploring the possibility of teaming up with *Recycleworks* to continue outreach to junior high and high school students after June 2012, when the current contract with Rock Steady Science expires.

## **Media Relations**

### ***BASMAA Regional Media Relations Project (Regional)***

Through participation and funding of the **BASMAA Regional Media Relations Project**, the Town plans to continue to implement a media relations project partially designed to reduce littering from target audiences in the Bay Area. The goal of the BASMAA Media Relations Project is to generate media coverage that encourages individuals to adopt behavior changes to prevent water pollution, including littering. At least two press releases or PSAs focus on litter issues each year (e.g., creek clean-up activities, preventing litter by using reusable containers, etc.).

### ***Coastal Cleanup Day Promotion (Countywide)***

On the countywide level, SMCWPPP also conducts annual press releases for Coastal Cleanup Day, and uses Twitter to promote cleanup events. These releases are intended to gain support and assistance for cleanup events conducted each September in local water bodies.

## **Community Outreach Events**

SMCWPPP, through its Public Information and Participation (PIP) program, plans to continue to conduct community outreach events on behalf of Permittees who request support. Outreach materials related to litter that are distributed include, in addition to the children's materials listed above under Outreach to School-age Children or Youth, a promotional sign for cigarette smokers to discourage cigarette litter, and pocket ashtrays are given out. A general stormwater pollution prevention flyer in English and Spanish that includes litter reduction in its messaging is distributed. In addition to table outreach events conducted for specific permittees, PIP also conducts a Countywide Event aimed to reach residents from throughout the county. PIP manages an online calendar which promotes cleanup events by non-profit organizations throughout the county. In FY 2011, PIP completed its 6<sup>th</sup> year acting as the county coordinator for Coastal Cleanup Day, increasing volunteer participation by 400% in that time, and trash removal increased by 300%.

During the term of the MRP, new outreach materials are also being considered for dissemination to the public, including reusable shopping bags to encourage reduction in use of plastic carryout bags. In addition, spring cleanups taking place in individual jurisdictions are planned to be promoted under one theme by PIP, who will assist directing volunteers to cleanup events in their communities. SMCWPPP is planning to conduct a total of 10-12 outreach events on behalf of various jurisdictions within the county in the 2011-12 fiscal year. SMCWPPP will also continue maintaining an online calendar of cleanups on a monthly basis.

## **Percent Reduction from Enhancements**

The Town of Woodside will receive a total of 8 percent reduction credit for implementing specific enhanced control measures described in *Enhanced Level of Implementation* section above. This percent reduction is comprised of the following credits, consistent with the *Load Reduction Tracking Method*:

- Litter Reduction Advertising Campaigns – 3%
- Outreach to School-age Children or Youth – 2%
- Media Relations – 1%
- Community Outreach Events - 2%

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These 8 percent reduction credits will be applied against the Town of Woodside's baseline trash load. This percent reduction credit is consistent with methods presented in the BASMAA (2012a). A summary of all load reductions anticipated through the implementation of this plan are included in Section 4.0.

## CR-4: Reduction of Trash from Uncovered Loads

Although it is currently illegal to operate a vehicle that is improperly covered and which its' contents escapes<sup>3</sup>, vehicles remain an important trash source to MS4s and local waterways. Specifically, vehicles that do not secure or cover their loads when transporting trash and debris have a high risk of contributing trash to MS4s. Land areas that generate trash from vehicles include roads, highways (on/off ramps, shoulders or median strips) and parking lots. To help address the dispersion of trash from unsecured or uncovered vehicles destined for landfills and transfer stations, Permittees may require municipally-contracted trash haulers to cover or secure loads or work with municipal or private landfill and transfer station operators to educate waste haulers on securing loads and/or to enhance enforcement of existing regulations.

### Baseline Level of Implementation

The baseline trash load described in Section 2.0, assumes that prior to adoption of the MRP the Town of Woodside has not adopted control measures to reduce trash from vehicles with uncovered loads. Therefore, implementation of any of the control measures described in this section is considered to be enhanced implementation.

### Enhanced Level of Implementation

The Town of Woodside will implement the following enhanced control measures to reduce trash from vehicles with uncovered loads:

- Development and inclusion of language in the Town's hauling service contracts that requires contracted trash and construction debris haulers to cover loads when transporting trash and debris to municipally or privately-owned landfills and transfer stations.
- Actively working with local law enforcement to establish an enhanced enforcement program for vehicles with uncovered loads.

### Percent Reduction from Enhancements

The Town of Woodside will receive a 3 percent reduction credit for implementing specific enhanced control measures described in the *Enhanced Level of Implementation* section above. This percent reduction credit was obtained from the *Trash Load Reduction Tracking Method Report* (BASMAA 2012a) and is presented in the Trash Load Reduction Summary Table included in Section 4.

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<sup>3</sup> In accordance with the California Vehicle Code Sections 23114 and 23115, it is against the law to operate a vehicle on the highway which is improperly covered, constructed, or loaded so that any part of its contents or loads spills, drops, leaks, blows, or otherwise escapes from the vehicle. Exempted materials include hay and straw, clear water and feathers from live birds. Additionally, any vehicle transporting garbage, trash, or rubbish, used cans or bottles, waste papers, waste cardboard, etc. must have the load covered to prevent any part of the load from spilling on the highway (CVC 2011). Significant fines are possible for non-compliance.

## **CR-5: Anti-Littering and Illegal Dumping Enforcement Activities**

Successful anti-littering and illegal dumping enforcement activities include laws or ordinances that make littering or dumping of trash illegal. Laws are enforced by various municipal agency staff (e.g., police, sheriff and public works department staff) who issue citations in response to citizen complaints or other enforcement methods (e.g., surveillance cameras, signage and/or physical barriers installed at illegal dumping hot spots). In some California jurisdictions, the minimum fine for littering is \$500 and the maximum penalty for highway littering is \$1000 (City of San Francisco 2001). However, it is difficult to enforce small littering events unless they are witnessed or solid proof exists linking the offender to the litter. As a result, enforcement tends to focus on larger scale illegal dumping activities.

### **Baseline Level of Implementation**

The baseline trash load described in Section 2.0, assumes that the Town of Woodside has adopted a basic anti-littering and illegal dumping enforcement program that entails receiving and responding to complaints from citizens as resources allow.

### **Enhanced Level of Implementation**

The Town of Woodside will implement the following enhanced anti-littering and illegal dumping enforcement control measures:

- The Town's enforcement program is part of the Municipal Code under the Nuisance Chapter. The Town currently has a successful implementation of an active anti-littering and illegal dumping enforcement program. The program includes thorough investigations of complaints received for an illegal dumping from the Public Works, Police and Building Departments. Implementation of enforcement procedures include citations (as warranted), and the collection of evidence from illegal dump sites in an attempt to identify offenders.
- Installation of physical barriers (e.g., fences, walls) or physical improvements (e.g., maintenance) which eliminate or deter illegal dumping at high priority sites identified within the Town's jurisdictional area.

### **Percent Reduction from Enhancements**

The Town of Woodside will receive a 3% percent reduction credit for implementing specific enhanced control measures described in the *Enhanced Level of Implementation* section above. The 3%percent reduction credit will be applied to the baseline trash load to urban creeks from the municipal separate storm sewer system (MS4) owned and operated by the Town of Woodside. This percent reduction credit was obtained from the *Trash Load Reduction Tracking Method Report* (BASMAA 2012a) and is presented in the Trash Load Reduction Summary Table included in Section

## CR-6: Improved Trash Bin/Container Management

Receptacles used to place/store trash or recyclables prior to collection by a public agency or private waste hauler reduce the potential for littering and trash loading to stormwater conveyance systems and receiving waters (City of Los Angeles 2004). For the purposes of assigning trash load reduction credits, receptacles fall into the following two categories:

- **Private Trash/Recycling Bins:** A receptacle for placing trash or recyclables generated from a household, business, or other location that is serviced by a trash hauler. Bins are specifically-designed, heavy-duty plastic wheeled containers with hinged lids; or large multi-yard metal or plastic containers rectangular in shape.
- **Public Area Trash Containers:** A receptacle for placing incidental trash generated in public spaces that provides people with a convenient and appropriate place to dispose of trash. The design and size of public area trash containers vary widely, depending on their setting and use.

The effectiveness of bins/containers and bins in reducing trash in the environment is likely dependent upon: the location and density of the receptacles, size of the bin/container in relationship to the size needed to service users, frequency of maintenance, and the ability of the bin/container to capture and contain the trash deposited.

### Baseline Level of Implementation

The baseline trash load described in Section 2.0, assumes that the Town of Woodside has not implemented enhanced trash bin/container management practices prior to effective date of the MRP.

### Enhanced Level of Implementation

The Town of Woodside will implement the following improved trash bin/container management practices :

- Implementation of Strategic Plan for Public Area Trash Containers – Implementation of a strategic plan that:
  - Identifies whether public area trash containers are sufficiently located in high trash generating areas and are adequately designed to manage trash types that typically are generated from activities occurring at these areas (e.g., containers with larger openings designed to accommodate larger trash items (e.g., pizza boxes) are in locations where people dispose of these items (e.g., near schools or parks).
  - Identifies an increased level of inspection and maintenance of public area trash containers is needed at high trash generating sites.
  - Includes the installation of specialty trash bins/containers (e.g., bins for cigarette butts, sharps, etc.) in specific locations to eliminate or reduce the prevalence of these items in stormwater.
  - Includes the installation of new technologies (e.g., Big Belly Solar Trash Compactors) to reduce trash in stormwater and reduce the cost of adding public area trash containers.

### **Percent Reduction from Enhancements**

The Town of Woodside will receive a 3 percent reduction credit for implementing specific enhanced control measures described in the *Enhanced Level of Implementation* section above. The 3 percent reduction credit will be applied to the baseline trash load to urban creeks from the municipal separate storm sewer system (MS4) owned and operated by the Town of Woodside. This percent reduction credit was obtained from the *Trash Load Reduction Tracking Method Report* (BASMAA 2012a) and is presented in the Trash Load Reduction Summary Table included in Section 4.

## **QF-2: Enhanced Street Sweeping**

Street sweeping is conducted by most, if not all, Bay Area municipalities to remove trash and debris that collect in the gutters at the edge of streets. Parked cars and large storms that produce significant runoff can impact the effectiveness of street sweepers. However, increasing parking enforcement or more frequent street sweeping (as compared to the frequency of storm events) may increase the trash load reduced to MS4s. Permittees who choose to enhance street sweeping may do so to demonstrate trash load reductions to their MS4s and progress towards trash load reduction goals required by the MRP.

### **Baseline Level of Implementation**

The baseline trash load described in Section 2.0 incorporates the trash load reductions due to baseline street sweeping.

### **Enhanced Level of Implementation**

The Town of Woodside's baseline street sweeping program includes sweeping at a frequency of 4 times per month on average on Canada Road and Whiskey Hill Road. The debris that is collected by the street sweeper is mostly vegetation, tree leaves, and dirt. Both streets do not have curb and gutter and have vegetated buffers on both sides which are frequently maintained by property owners. Most property's on these streets are setback from the edge of pavement and have driveways that lead to large flag parcels. Parking is typically on site. Due to the geographic nature of the properties in Woodside, additional sweeping frequencies and parking enforcement would not likely reduce the trash load.

### **Percent Reduction from Enhancements**

The total estimated annual volume of trash that will be reduced by July 1, 2014 as a result of existing enhanced street sweeping is 11 gallons. As described in Trash Load Reduction Summary Table included in Section 4, this volume is equal to approximately a 0.7 percent reduction in the baseline trash load to urban creeks from the municipal separate storm sewer system (MS4) owned and operated by the Town of Woodside.

## **QF-4: Enhanced Storm Drain Inlet Maintenance**

In accordance with countywide Stormwater Conveyance System Operation and Maintenance Performance Standards, storm drain inlets are maintained at least once per year by Permittees. Permittees who have enhanced storm drain inlet maintenance by increasing the frequency of cleanouts may use the load of trash reduced to MS4s to demonstrate attainment of trash load reduction goals required by the MRP.

### **Baseline Level of Implementation**

The baseline trash load described in Section 2.0 assumes that the Town of Woodside currently maintains and removes material from storm drain inlets at least once per year. This baseline frequency is consistent with the frequency of storm drain inlet maintenance in the Town of Woodside prior to the effective date of the MRP.

### **Enhanced Level of Implementation**

A total of 350 storm drain inlets will be maintained in the Town of Woodside at higher frequencies prior to July 1, 2014. The enhanced frequency of maintenance and associated effectiveness ratings will be used to calculate loads reduced from enhanced maintenance. This load reduction calculation method is consistent with the trash load reduction tracking method (BASMAA 2012a).

Inlet locations rarely contain trash, but are periodically maintained and continuously monitored throughout the year. Areas of specific concern will be flagged by the Town's maintenance supervisor for recommended enhancements.

### **Percent Reduction from Enhancements**

The total estimated annual volume of trash that will be reduced by July 1, 2014 as a result of implementing enhanced storm drain inlet maintenance is 39 gallons. This volume is equal to approximately a 2.6% percent reduction in the baseline trash load to urban creeks from the municipal separate storm sewer system (MS4) owned and operated by the Town of Woodside. Both values provided within this section are included in Trash Load Reduction Summary Table included in Section 4.

## **QF-6: Creek/Channel/Shoreline Cleanups**

Creek/channel/shoreline cleanups have been successful in removing large amounts of trash from San Francisco Bay area creeks and waterways; and increasing citizen's awareness of trash issues within their communities. Creek/channel/shoreline cleanups are conducted as single-day events or throughout the year by volunteers and municipal agencies. Since volunteers and municipal agencies have the common goal of clean creeks and waterways, their efforts sometimes overlap. This is apparent with some municipal agencies using volunteers to help assess and clean designated trash hot spots during single-day volunteer events.

### **Baseline Level of Implementation**

Trash reduced via creek/channel/shoreline cleanups was not accounted for in the Town of Woodside's baseline trash load described in Section 2.0. Therefore, implementation of any of the control measures described in this section is considered to be an enhancement and can be used to demonstrate progress towards load reduction goals.

### **Enhanced Level of Implementation**

Prior to July 1, 2014, the Town of Woodside will conduct MRP-required<sup>4</sup> and non MRP-required creek/channel/shoreline cleanups<sup>5</sup>. Both types of cleanups will be conducted each year and the volume of trash removed will be tracked to demonstrate trash loads reduced.

### **Percent Reduction from Enhancements**

The total estimated annual volume of trash that will be reduced by July 1, 2014 as a result of implementing creek/channel/shoreline cleanups is 22 gallons. This volume is equal to approximately a 1.5 percent reduction in the baseline trash load to urban creeks from the municipal separate storm sewer system (MS4) owned and operated by the Town of Woodside. Both values provided within this section are included in Trash Load Reduction Summary Table included in Section 5.

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<sup>4</sup> Creek/channel/shoreline cleanups conducted in accordance with Permit Provision C.10.b.

<sup>5</sup> All "other" creek/channel/shoreline cleanups conducted by a municipality that are not required by Provision C.10.b.

## **5.0 SUMMARY OF TRASH CONTROL MEASURE ENHANCEMENTS**

The Town of Woodside is committed to reducing the potential for trash impacts in local water bodies in the San Francisco Bay Area. The planned enhanced trash control measures described in Section 3.0 are also listed in Table 5-1. The enhancements are intended to comply with the 40% trash load reduction goal in MRP provision C.10.

**Table 5-1. Planned enhanced trash control measure implementation within the jurisdictional boundaries of the Town of Woodside and associated trash loads reduced.**

Trash Control Measure	Summary Description of Control Measure	% Reduction (Credits)	Trash Load Reduced	Cumulative % Reduction (Compared to Baseline)
<b>Public Education and Outreach Programs (CR-3)</b>	Increase participation and contribution to outreach programs, community events and media relations through collaborative efforts with the countywide program or individually as a Town.	<b>8.0%</b>	<b>119</b>	<b>8.0%</b>
<b>Activities to Reduce Trash from Uncovered Loads (CR-4)</b>	Adopt standardized conditions of approval to require trash and construction debris hauler to cover during transportation; and enhancement to prohibit the transportation of trash or debris without a cover.	<b>5.0%</b>	<b>74</b>	<b>12.9%</b>
<b>Anti-Littering and Illegal Dumping Enforcement Activities (CR-5)</b>	Implementation to install physical barriers or physical improvements such as parks.	<b>3.0%</b>	<b>45</b>	<b>15.9%</b>
<b>Improved Trash Bin/Container Management (Municipally or Privately-Controlled) (CR-6)</b>	Implementation to inter-department efforts to ensure that public areas have adequate trash containers and services.	<b>3.0%</b>	<b>45</b>	<b>18.9%</b>
<b>Enhanced Street Sweeping (QF-2) – (Existing and Future Enhanced)</b>	Sweeping Canada Road and Whiskey Hill Road four times per month	<b>NA</b>	<b>11</b>	<b>19.7%</b>
<b>Enhanced Storm Drain Inlet Maintenance (QF-4)</b>	Implementation of Storm drain maintenance plan.	<b>NA</b>	<b>39</b>	<b>22.3%</b>
<b>Creek/Channel/Shoreline Cleanups (Volunteer and/or Municipal) (QF-6)</b>	MRP-required and non MRP-required cleanups	<b>NA</b>	<b>22</b>	<b>23.7%</b>

## 5.1 Annual Reporting and Progress Towards Trash Load Reduction Goal(s)

Consistent with MRP Provision C.10.d (i), the Town of Woodside intends to report on progress towards MRP trash load reduction goals on an annual basis beginning with the Fiscal Year 2011-2012 Annual Report. Annual reports will include:

1. A brief summary of all enhanced trash load reduction control measures implemented to-date;
2. The dominant types of trash likely removed via these control measures;
3. Total trash loads removed (credits and quantifications) via each control measure implementation; and
4. A summary and quantification of progress towards trash load reduction goals.

Similar to other MRP provision, annual reporting formats will be consistent region-wide. Annual reports are intended to provide a summary of control measure implementation and demonstrate progress toward MRP trash reduction goals. For more detailed information on specific control measures, the Town of Woodside will retain supporting documentation on trash load reduction control measure implementation. These records should have a level of specificity consistent with the trash load reduction tracking methods described in the *BASMAA Trash Load Reduction Tracking Method Technical Report* (BASMAA 2012a).

## 5.2 Considerations of Uncertainties

Baseline trash loading and load reduction estimates are based on the best available information at the time this Short-Term Plan was developed. As with any stormwater loading and reduction estimate, a number of assumptions were used during calculations and therefore uncertainty is inherent in the baseline trash load estimate presented in Section 2.0 and the load reduction estimate presented in this section. For these reasons, the baseline loading estimates presented in this plan should be considered first-order estimates. During the implementation of this Short-Term Plan and subsequent plans, additional information may become available to allow the calculation of a more robust baseline load.

## 6.0 IMPLEMENTATION SCHEDULE

Implementation of enhanced trash control measures by the Town of Woodside is currently planned to occur in a timeframe consistent with MRP requirements. A preliminary implementation schedule for all planned enhancements is described in Table 5-1. This schedule provides a timeframe for reducing trash discharged from the Town of Woodside's MS4 by 40%.

Based on new information that becomes available during the implementation of this Short-Term Plan (e.g., revisions to baseline loading estimates or load reduction credits of quantification formulas), the Town of Woodside may chose to amend or revise this Plan and/or the associated implementation schedule. If revisions or amendments occur, a revised Short-Term Plan and implementation schedule will be submitted to the Water Board via the Town of Woodside's annual reporting process.

**Table 6-1. Preliminary implementation schedule for enhanced trash control measures in the Town of Woodside.**

Trash Control Measure	Beginning Date of Implementation
Public Education and Outreach Programs (CR-3)	End of fiscal year of 2011-2012.
Activities to Reduce Trash from Uncovered Loads (CR-4)	End of fiscal year of 2011-2012.
Anti-Littering and Illegal Dumping Enforcement Activities (CR-5)	End of fiscal year of 2011-2012.
Improved Trash Bin/Container Management (Municipally or Privately-Controlled) (CR-6)	End of fiscal year of 2011-2012.
Enhanced Street Sweeping (QF-2)	Implemented
Enhanced Storm Drain Inlet Maintenance (QF-4)	End of fiscal year of 2011-2012.
Enhanced Pump Station Trash Rack Cleaning (Partial-capture Treatment Device) (QF-3b)	End of fiscal year of 2011-2012.

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