



DIRECT DISCHARGE TRASH CONTROL PROGRAM

Supplemental Submission

May 27, 2016

Submitted in accordance with provision Section C.10.e.ii of NPDES Permit No. CAS612008.

Direct Discharge Trash Control Program - Supplemental

1.0 INTRODUCTION

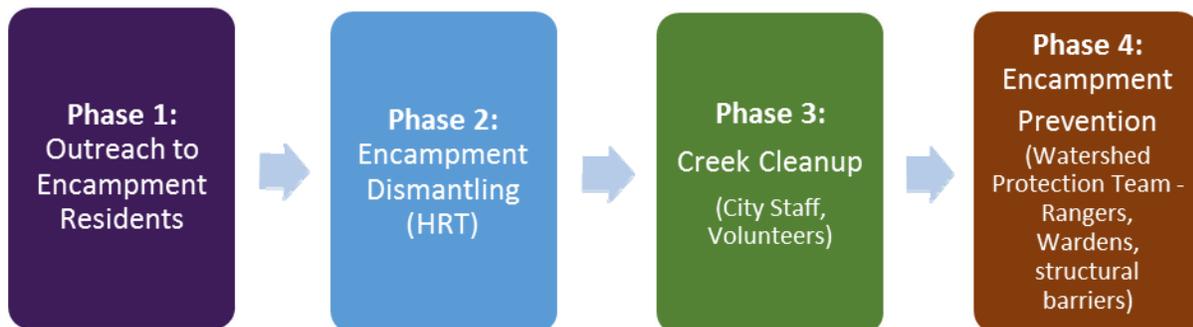
1.1 Purpose

The purpose of this document is to provide supplemental information on the Direct Discharge Trash Control Plan submitted to the Regional Water Quality Control Board on February 1, 2016. This supplemental information provides clarification regarding the City’s approach to implementing the Program, information on “Focus Zones” and “Project Areas,” current conditions, the ongoing monitoring plan, and performance metrics.

1.2 San José’s Phased Approach

As a general overview, the City’s Direct Discharge Program approach entails a coordinated effort of several City programs which constitute a **systematic and comprehensive program to address trash in waterways resulting from homeless encampment activity**. The multi-step approach includes the work of the City’s Homelessness Response Team (HRT) which attempts to provide social services and housing to the homeless and subsequently dismantles encampments; the use of volunteer groups and/or contracted staff (e.g., Downtown Streets Team (DST)) to remove any remaining residual trash; and finally, patrolling by the City’s Watershed Protection Team (WPT) led by the City’s Park Rangers to prevent encampments along waterways from being reestablished or entrenched (See Figure 1).

FIGURE 1. SAN JOSÉ DIRECT DISCHARGE CONTROL PROGRAM ELEMENTS



During **Phase 1**, City staff conduct outreach to encampment residents. The objective is to provide social services and alternative house opportunities to the homeless, resulting in fewer homeless living in encampments. This phase may take up to 60 days to complete and is repeated as long as is necessary.

During **Phase 2**, (after required noticing and property storage occurs) large encampment structures and items are removed by the City’s Homelessness Response Team and a contracted construction company. The objective is to clear the site from ongoing habitation and remove the majority of the accumulated debris. Depending on the size of the encampment, this phase may take anywhere from hours to several days to complete and is repeated as long as is necessary.

During **Phase 3**, City staff, volunteer organizations, and/or contracted staff conduct multiple cleanups. The objective is to remove any remaining residual trash that may not have been collected during Phase 2. Also during this phase, appropriate locations for structural barriers are identified. This phase can take up to six months repeating as long as is necessary.

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During **Phase 4**, the WPT team (i.e., Park Rangers) and Fish and Wildlife Wardens patrol the cleaned areas regularly; depending on the location and available resources, Rangers may patrol up to a daily basis. During this phase, structural barriers are installed at locations previously identified. Finally, DST begins reactivation of the site with regular sweeps of priority areas. If DST team members encounter homeless individuals as they sweep, they engage them in peer-to-peer conversations aimed at connecting them with services and moving them out of the area. The objective is to minimize re-encampment and bring the site to a “maintenance level” which allows the habitat to recover. This phase is ongoing. If re-encampment occurs, Phases 1, 2 and 3 are repeated.

2.0 FOCUS ZONE AND PROJECT AREA DESCRIPTIONS

San José is home to approximately 140 miles of waterways. Protecting the water quality of this vast riparian area requires significant resource commitment. Consequently, San José is taking a prioritized approach by distributing its available resources along its waterways with a scale and frequency commensurate with the varying observed environmental conditions/needs. Simply put, the City directs greater resources in a more tightly coordinated fashion to areas most heavily impacted by homeless encampments, while also directing resources to larger and less impacted zones at a more modest level.

The City deploys three distinct levels of effort in implementing its plan:

- **Focus Zones:** These zones are comprised of stretches along the City’s two major waterways (i.e., Guadalupe River and Coyote Creek), currently ranging from four to twelve miles in length. In the Focus Zones, the number of encampments and their locations are tracked and the various elements of the Program are deployed at as many locations as resources allow with the intent of preventing homeless individuals from establishing new encampments and preventing entrenchment. Phase 1 outreach is conducted throughout the Focus Zones on an ongoing basis and elsewhere as needed. While campers may move along the waterways, activity is deployed with the intent of keeping them moving and moving away from waterways.
- **Project Areas:** These areas are specific priority locations within Focus Zones. In Project Areas, more tightly coordinated and frequent activity is deployed to clear homeless encampments, remove residual trash, and prevent campers from reestablishing encampments in a more systematic way. During monthly meetings, Program team members identify dates when each phase will be systematically deployed in each Project Area, to progress toward relatively trash-free areas. For instance, while Phase 1 outreach is being conducted, dates are identified for the Phase 2 HRT sweeps to begin in the Project Areas. Depending on the duration needed for the Phase 2 HRT sweeps, dates for Phase 3 for City and volunteer organization cleanups are determined to remove residual trash. If Phase 2 is anticipated to be completed quickly, Phase 3 dates will be determined at the same time the Phase 2 dates are identified. If Phase 2 is anticipated to take longer, Phase 3 dates will be determined as Phase 2 nears completion. The efforts of these two Phases are repeated until the area is relatively trash free. Phase 4 patrolling and DST sweeps begin to overlap with Phase 3 as the Project Areas approach maintenance mode to keep the site activated and prevent new encampments.

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- **Complaint-Based**: The remaining areas along the City’s waterways are addressed mostly in a complaint-based manner. The City prioritizes the cleanup of these locations with consideration to criteria including environmental impact, size of encampment, number of complaints, proximity to sensitive facility (e.g., school), and proximity to other locations planned for cleanup. The City addresses complaints from any location, but finds they are primarily in the more populated areas where proximity to services and resources is more prevalent.

2.1 Coyote Creek Watershed

2.1.1 Coyote Creek Focus Zone

The Coyote Creek Focus Zone (Focus Zone #1) encompasses a stretch of the creek approximately 10.7 miles long, beginning at Capitol Expressway and proceeding downstream to Brokaw Road (See Map 1: San José Direct Discharge Trash Control Program Map). Focus Zone #1 was selected because it encompasses several large park-like areas historically prone to establishment of entrenched encampments. In addition to the secluded park-like areas, this zone is in close proximity to resources such as grocery stores, fast food, and other amenities and services, making this stretch attractive to homeless individuals.

Direct Discharge Control Program Control Program Activities:

- As encampments are identified:
 - Varying levels of outreach are deployed (e.g., collateral handout by City staff and/or social service organizations)
 - The HRT notices and dismantles them
 - City and/or Volunteer cleanups are held at sites most impacted by residual trash
- WPT Rangers patrol two thirds of the zone and will eventually extend to cover the full zone as the northern stretch progresses through Phase 3

2.1.2 Coyote Creek Project Areas

Within the larger Coyote Creek Focus Zone, are three priority areas. These areas have been identified for full implementation of the Direct Discharge Trash Control Program. (See Map 1: San José Direct Discharge Trash Control Program Map)

Project Area #1: A 30.4-acre area at intersection of Coyote Creek at Story Road (See Map 2: Project Area #1) known as “Coyote Meadows” (previously known as “the Jungle”), has received the concentrated attention of the Program since September 2014 and reached “Phase 4” in June 2015 where regular patrolling maintains the area free of entrenched encampments.

Direct Discharge Control Program Activities Conducted To-Date:

- Fall 2014: Phase 1 Housing outreach began in September 2014 and continues as needed
- December 2014: Phase 2 HRT dismantlement began and continues as needed
- Spring 2015: Phase 3 City and volunteer cleanups began and continue as needed
- Winter 2014: Phase 4 patrolling began and continues

Direct Discharge Control Program Activities Planned and/or Ongoing:

- Phase 2 HRT dismantling continues as needed
- Phase 3 cleanups continue as needed during the dry season

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- Phase 4 weekly patrolling will continue
- A trail is planned to be constructed through this park area by the end of 2017

Project Area #2: A 120-acre park-like area adjacent to the Los Lagos Golf Course (See Map 3: Project Area #2), also known as the “Tea Cups”, began receiving concentrated focus in Spring 2016. The goal is to bring this area to Phase 4 by the end of December 2016.

Direct Discharge Control Program Activities Conducted To-Date:

- Fall 2015: Phase 1 Housing outreach began and continues
- August 2015: Phase 2 HRT dismantlement began and continues as needed
- Fall 2015: Phase 3 City and volunteer cleanups began and continues as needed
- Winter 2015: Phase 4 patrolling began and continues

Direct Discharge Control Program Activities Planned and/or Ongoing:

- Phase 3 City cleanups are to begin in Summer 2016 will bring in bobcat tractors and a compactor truck to remove residual materials left from dismantled encampments.
- Phase 3 Volunteer cleanups will be conducted to supplement WPT efforts including a cleanup scheduled for Coastal Cleanup Day on September 17, 2016
- Phase 4 patrolling will continue
- Projected Fall 2016: The City will soon begin a six-month community visioning process to determine the needs of the community which will drive future plans for a park at this site.

Project Area #3: A 66-acre park-like area adjacent to the San José Municipal Golf Course (also known as “North San José”). This area began receiving more coordinated focus in 2015 with the goal of bringing it to Phase 4 over the next 18 months, by the end of June 2017.

Direct Discharge Control Program Activities Conducted To-Date:

- July 2015: Phase 1 Housing outreach began and continues
- August 2015: Phase 2 HRT dismantlements began and continue
- August 2015: Phase 3 City cleanups began and continue

Direct Discharge Control Program Activities Planned and/or Ongoing:

- Spring 2016: HRT encampment dismantlement will continue
- Spring 2016: City cleanups will continue
- Projected Fall 2016: Volunteer cleanups will commence
- Projected Spring 2017: Patrolling to begin

Table 1 provides a historical look at the implementation of each phase in the Project Areas.

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TABLE 1. SAN JOSÉ DIRECT DISCHARGE COYOTE CREEK PHASED IMPLEMENTATION

	Project Area #1	Project Area #2	Project Area #3
Phase 1 (Outreach)	Fall 2014 (began)	Fall 2015 (began)	July 2015 (began)
Phase 2 (Dismantlement)	December 2014 (began)	August 2015 (began)	August 2015 (began)
Phase 3 (Cleanups)	Spring 2015 (began)	Fall 2015 (began)	August 2015 (began)
Phase 4 (Patrolling)	Winter 2014 (began)	Winter 2015 (began)	June 2017 (to begin)

2.2 Guadalupe River Watershed

Efforts over the past five years that have evolved into the Program have brought San José’s Guadalupe River and Los Gatos Creek to Phase 3 approaching Phase 4. Both of these water bodies benefit from completed trails adjacent to them that have regular pedestrian and bicycle activity as well as regular patrolling by the WPT to prevent encampments from entrenching. During FY 16-17, resources will continue to be deployed in two Focus Zones with the intent of having them reach Phase 4 status by the end of the fiscal year in June 2017. For similar reasons, these zones were chosen due to their proximity to amenities and services as opposed to the more outlying areas where these options are less consistently available.

2.2.1 Guadalupe River North Focus Zone (Focus Zone #2)

Focus Zone #2 encompasses a stretch of the Guadalupe River approximately 11.6 miles long between Highways 85 and 101.

Direct Discharge Control Program Control Program Activities:

- As encampments are identified:
 - Varying levels of outreach are deployed (e.g., collateral handout by City staff and/or social service organizations)
 - The HRT notices and dismantles them
 - City and/or Volunteer cleanups are held at sites most impacted by residual trash
- WPT Rangers patrol the Zone and clean encampments as necessary

2.2.2 Los Gatos Creek Focus Zone (Focus Zone #3)

Focus Zone #3 encompasses a stretch of the creek approximately 4.4 miles long Los Gatos Creek from Bascom Avenue to the confluence point with the Guadalupe River.

Direct Discharge Control Program Control Program Activities:

- As encampments are identified:
 - Varying levels of outreach are deployed (e.g., collateral handout by City staff and/or social service organizations)
 - The HRT notices and dismantles them
 - City and/or Volunteer cleanups are held at sites most impacted by residual trash
- WPT Rangers patrol the Zone and clean encampments as necessary

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3.0 MONITORING

The City will monitor and report on a variety of metrics in its annual report. Below are descriptions of the performance indicators that, collectively, are intended to document the progress of the City's program. See Table 2 for a list of performance indicators and the frequency with which they will be collected.

3.1 Encampment Counts (Waterway and On-land)

Collecting information about encampment locations and counts will provide an indication of the City's success in reducing encampments in the Project Areas and potentially also within entire Focus Zones. Monitoring encampments in waterways as well as on-land will allow for an assessment of relative trends of the two areas (i.e., are encampments reducing and/or moving away from waterways).

3.1.1 Number of Encampments Along Waterways

On a monthly basis, encampment locations will be noted in the three Focus Zones which represent the most active stretches of waterways. The City will compile information from the Program team members and use its established partnerships with volunteer creek cleanup organizations that regularly conduct cleanups to track encampment locations monthly in the course of their creek work.

Twice a year, encampment locations will be documented along the end-to-end full stretches of Coyote Creek, Guadalupe River, and Los Gatos Creek. The City has partnered with wardens from the State Department of Fish and Wildlife (DFW) who have been conducting point-in-time encampment counts along the Guadalupe River.

3.1.2 Number of On-Land Encampments

On-land encampments will be documented as resources are deployed by the Phase 1 outreach and Phase 2 HRT teams as they conduct their ongoing activities and respond to calls reporting encampment locations.

3.2 Cleanup Results

Gallons and tons of trash removed from the various team member groups will be reported in the annual report. The City tracks the location, date, and weight or volume of trash removed during each cleanup conducted. A summary as well as the detailed information will be reported. This metric will allow the City to assess trends in the volume of trash collected.

3.3 Watershed Protection Team Ranger Activity Data

The WPT patrols the Guadalupe River from Virginia Avenue to Gold Street, which includes the stretch of Focus Zone #2 from Virginia Avenue to 101and Coyote Creek between William Street and Yerba Buena Road to the Hellyer County Park boundary, which includes the stretch of Focus Zone #1 from Capitol to William Street. Patrols are conducted on Los Gatos Creek along the full stretch of Focus Zone #3 as requested and as resources allow. The team collects data and conducts cleanups as well. See Table 3 for an example Ranger Log. This data will illustrate the level of enforcement activity conducted to deter campers from locating near waterways and assess trends in volumes of trash collected.

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3.4 Housing Services and Outreach

The number of individuals referred to services and number of individuals housed each year will also be reported in the annual report. The biennial homeless survey will be a source of demographic information about San José’s homeless population and the primary source of the change in the number of homeless individuals from two years prior. This metric will allow the City to track progress on reducing the overall homeless population in San Jose, including those along waterways.

TABLE 2. PERFORMANCE INDICATORS

	Entire waterway stretches	Focus Zones (including the Project Areas)
Encampment counts	Semi-annual	Monthly
Encampment locations (waterways)	Semi-annual	Monthly
Encampment locations (on-land)	Monthly	Monthly
Number of patrols conducted	N/A	Monthly
Number of cleanups conducted	Annually	Annually
Tons (or cubic yards) of trash removed	Annually	Annually
Number of individuals referred to services	Annually	Monthly
Number of violation warnings	Annually	Monthly
Number of citations	Annually	Monthly
Number of arrests	Annually	Monthly

TABLE 3. SAN JOSÉ WATERSHED PROTECTION TEAM RANGER LOG BY WATERBODY

July 2014 – January 2015	Guadalupe River	Coyote Creek	Los Gatos	Others	Totals
Encampment Deterrence Patrols	81	101	39	11	232
Violation Warnings	99	223	42	0	364
Citations	1	66	2	0	69
Arrests	0	6	0	0	6
Referrals to Service Providers	38	357	30	2	427
Est. Volume of Trash (cubic yards)	58.5	510.5	23	1	593
Ranger Hours	188.5	782.75	75.5	21.25	1068

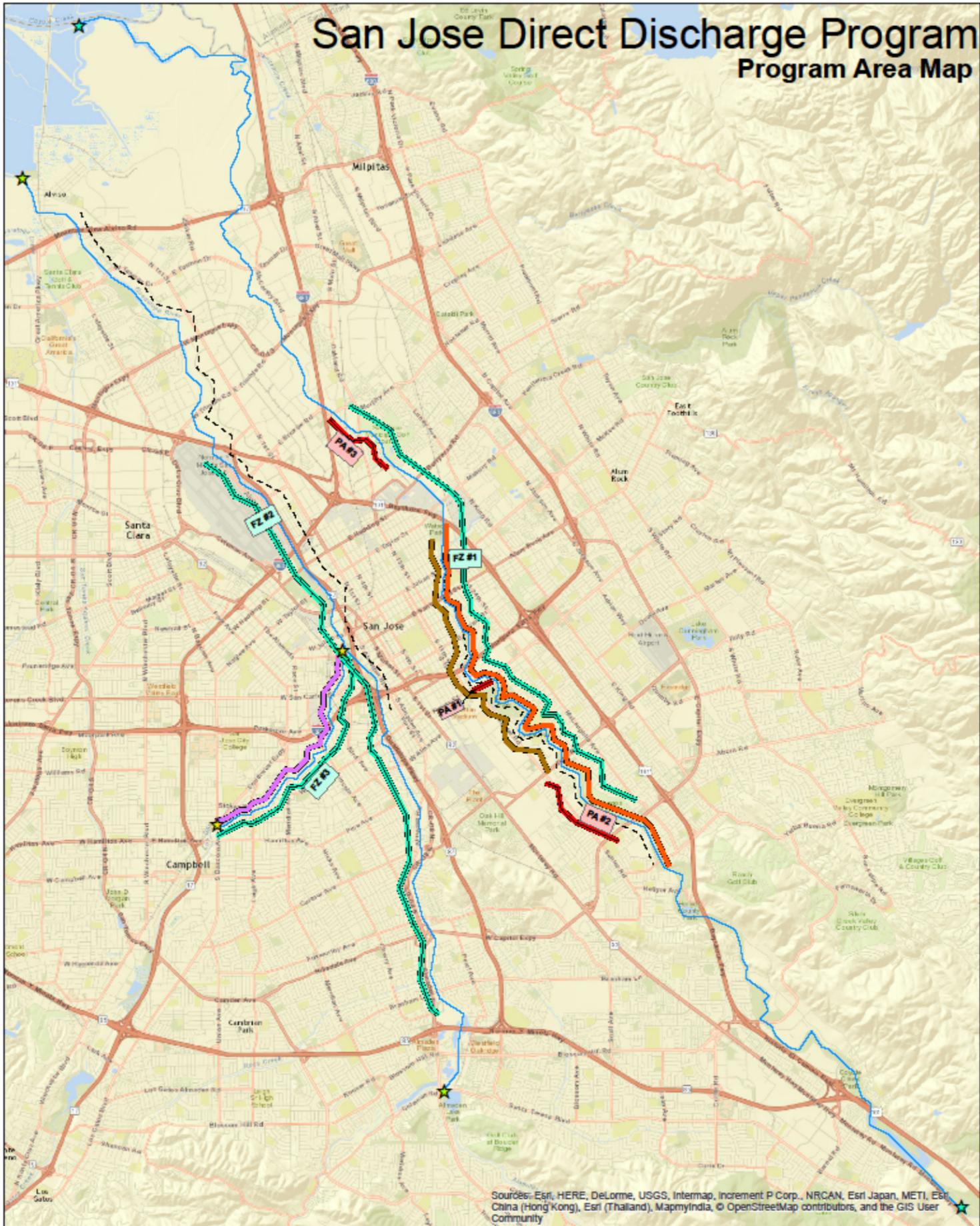
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4.0 SUMMARY

The City of San José has developed this comprehensive, multi-year Direct Discharge Trash Control Program to address trash along and in its major waterways resulting from homeless encampments. The program is designed to evolve as lessons are learned and continue through the entire term of the Municipal Regional Permit Order No. R2-2015-0049 with the goal of these major waterways being largely trash-free. Monthly and semi-annual metrics collected will be reported annually along with maps through the City's Stormwater Annual Report to document progress. The City thus requests approval of its Direct Discharge Control Program Plan and to claim offset credit of up to 15% toward its mandatory trash load reduction goals.

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MAP 1. SAN JOSE DIRECT DISCHARGE TRASH CONTROL PROGRAM MAP

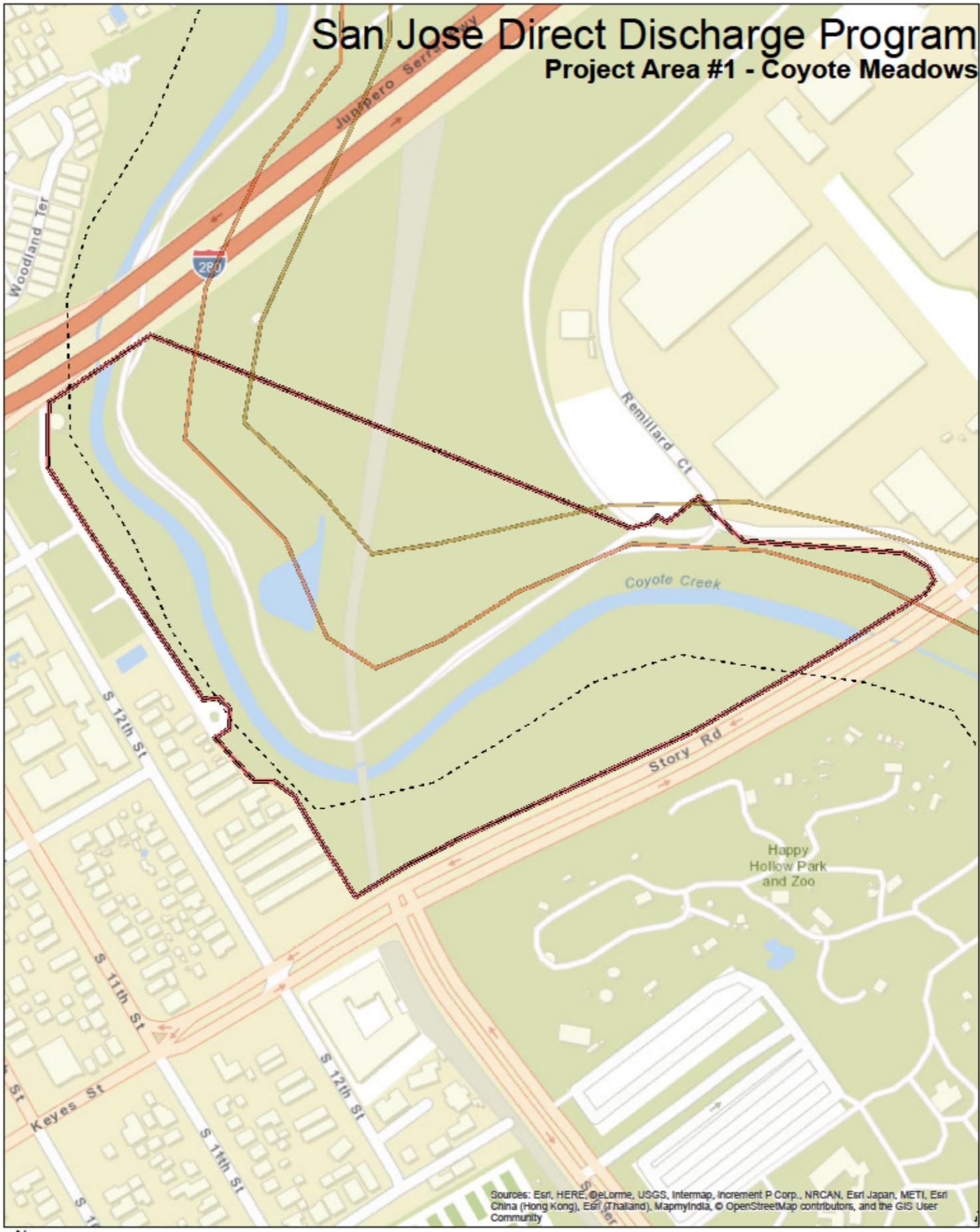


0 0.450.9 1.8 2.7 3.6 Miles

Legend

- FZ #1 - Captiol/Brokaw
- FZ #2 - Hwy 85/101
- FZ #3 - Bascom/Confluence
- PA #1 - Story Rd.
- PA #2 - Tully/Capitol
- PA #3 - Hazlett/880
- ★ Coyote Creek
- ★ Guadalupe River
- ★ Los Gatos Creek
- - - - - WPT Patrol Area 2
- KCCB/CCHC
- FOLGC
- DST
- - - - - WPT Patrol Area 1

MAP 2. SAN JOSE DIRECT DISCHARGE PROJECT AREA #1 MAP (COYOTE MEADOWS)

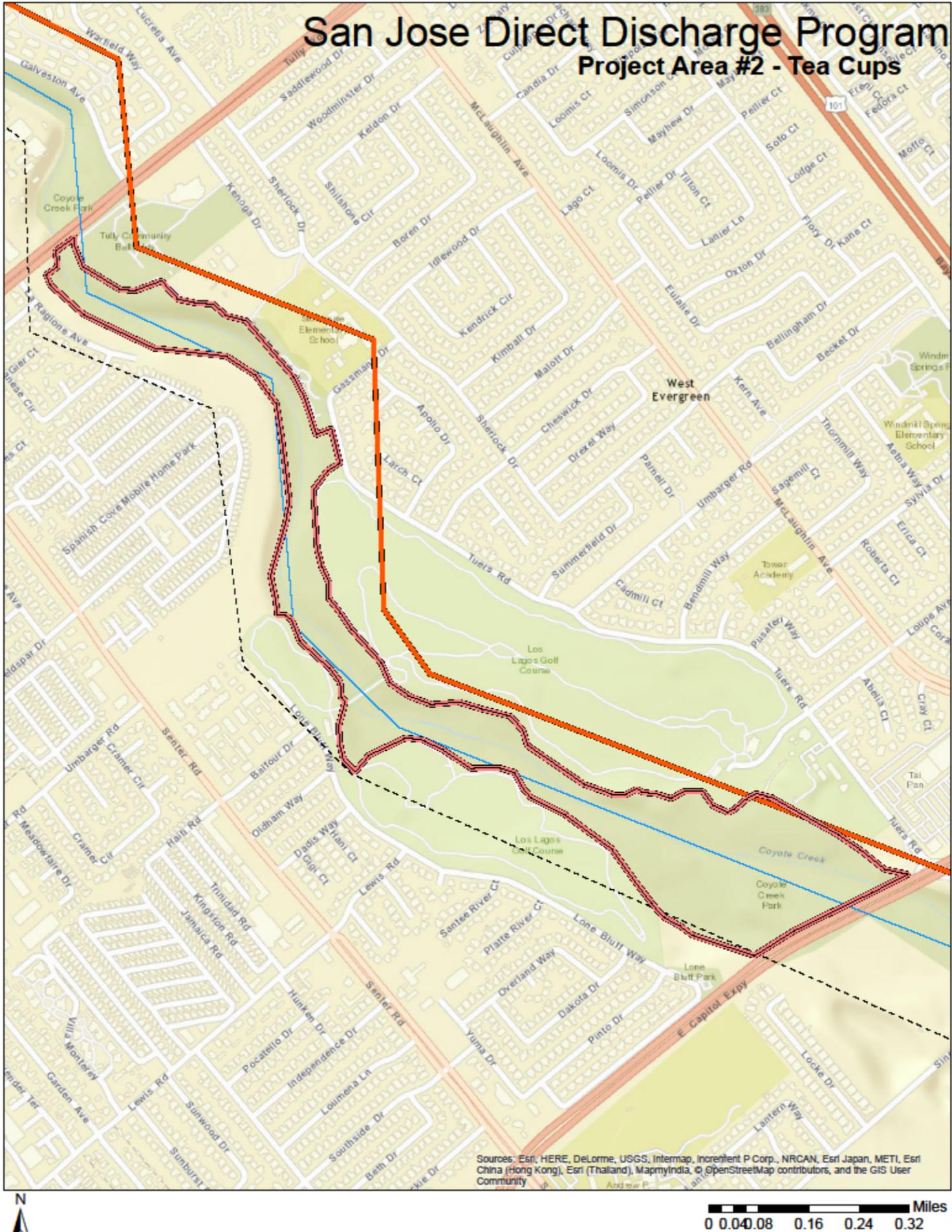


Legend

- KCCB/CCHC
- DST
- - - WPT Patrol Area 1
- Coyote Meadows

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MAP 3. SAN JOSE DIRECT DISCHARGE PROJECT AREA #2 MAP (THE TEA CUPS)



Legend

- Tea Cups
- KCCB/CCHC
- WPT Patrol Area 1
- Coyote Creek

MAP 4. SAN JOSE DIRECT DISCHARGE PROJECT AREA #2 MAP (N. SAN JOSE)



Legend

- N. San Jose
- Coyote Creek