

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

**STAFF SUMMARY REPORT: Qi Yan
MEETING DATE: December 10, 2025**

ITEM: 9

California Department of Transportation - Update on Compliance with Cease and Desist Order No. R2-2019-0007, Implementing Trash Discharge Reduction Requirements

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

STAFF SUMMARY REPORT: Qi Yan
MEETING DATE: December 10, 2025

ITEM: 9

California Department of Transportation - Update on Compliance with Cease and Desist Order No. R2-2019-0007, Implementing Trash Discharge Reduction Requirements

EXECUTIVE SUMMARY

The California Department of Transportation (Caltrans) is required by the [Cease and Desist Order](#), as [amended](#) (CDO), which the Board issued in February 2019 to control trash discharges by installing trash capture devices and cleaning up roadways. Since the 2024 CDO benchmark, Caltrans has continued efforts to identify municipal partners for cooperative projects to install trash capture devices that control trash from both Caltrans' and the municipalities' right-of-way. Caltrans has improved its process of validating the effectiveness of vegetation in controlling trash by improving their Vegetation Control Compliance and Delineation Protocol. In October 2025, Caltrans requested compliance credits for enhanced maintenance such as trash pick-ups or highway sweepings that remove trash before it discharges to the storm drain system. To demonstrate that maintenance activities are effective in removing trash to a low trash generation level, Caltrans is conducting a Trash Discharge Study to identify the required frequency and intensity of maintenance to achieve full trash capture equivalency. We think this is a reasonable approach to reflect the trash control benefits from maintenance activities while recognizing the interim compliance credits may be revised to align with the final study conclusion in 2026.

Looking forward to 2026 and the final CDO benchmarks, Caltrans must develop an updated trash workplan that continues the corridor-based trash control evaluations and accelerates implementation of structural trash control devices on right-of-way and off right-of-way, including pilot efforts for Hydrodynamic Separators (HDS) and multi-Gross Solid Removal Devices (Multi-GSRDs). Caltrans should also continue corridor-based trash control evaluations, focusing on high-trash areas to find additional reduction opportunities.

DISCUSSION

This item provides an update on the California Department of Transportation's (Caltrans') compliance with the subject [Cease and Desist Order](#), as [amended](#) (CDO), which the Board first issued to Caltrans in February 2019 to control trash discharges.

We previously updated the Board on Caltrans' trash control progress with information items at the [April](#) and [December](#) 2023 and the [December](#) 2024 Board meetings.

In December 2024, we updated the Board on Caltrans' compliance with the CDO's June 30, 2024 benchmark of 6,000 acres of significant trash generating areas controlled for trash. Caltrans has significantly increased funding and trash maintenance activities since the CDO's issuance and the current implementation of enhanced maintenance has improved trash conditions along many Caltrans highway corridors. However, in December 2024, we determined that Caltrans had not demonstrated compliance with the June 2024 benchmark because our field inspections of areas where enhanced maintenance measures were claimed as compliant found that substantial amounts of trash remained on the right of way, indicating that trash controls were not implemented to a level to achieve full trash capture equivalency in some areas. We found that Caltrans must conduct evaluations to demonstrate the claimed benefits of measures like enhanced maintenance and vegetative controls combined with maintenance, and to identify the level of implementation needed to achieve a benefit equivalent to full trash capture. Caltrans has completed the Vegetation Control Study and is completing the Trash Discharge Study to demonstrate the efficacy of enhanced maintenance.

The CDO's next benchmark requires Caltrans to control trash on 8,800 acres of significant trash generating areas by June 30, 2026. In its 2024-2025 Trash Reduction Annual Report (Annual Report), submitted this October, Caltrans describes its progress in implementing trash controls to comply with the June 2026 CDO benchmark. Caltrans has made significant progress since 2024 in identifying additional cooperative projects, implementing on-right-of-way full trash capture device installation, refining its vegetative trash control protocol, and proceeding with its Trash Discharge Study (Study) to demonstrate the benefits of enhanced maintenance measures. Table 1 summarizes Caltrans right-of-way that has achieved compliance through implementation of structural and institutional trash control actions.

Specifically, the Annual Report provides an update on the following compliance actions Caltrans is taking to evaluate additional trash control actions and come into compliance with the 2026 benchmark:

- Continuing collaboration with Bay Area municipal partners that provide resources for planning, design, and construction to implement off-right-of-way cooperative trash control projects.
- Implementing structural trash control devices on Caltrans right-of-way, including Caltrans' new inlet-based full trash capture device and a significant pilot effort for hydrodynamic separators and multi-gross solid removal devices (multi-GSRDs).
- Refining the Final Vegetation Control Protocol for Moderate Trash Generating Areas (Protocol) to identify potential roadside vegetative trash control areas for CDO compliance.
- Proceeding with the Trash Discharge Study, which is scheduled for completion in 2026, to substantiate the efficacy of enhanced maintenance measures and identify the level of effort needed to achieve full trash capture equivalency.

- Prioritizing high and very high trash generating highway corridors for planning and implementation of trash controls through a series of focused corridor-based feasibility workshops.

Table 1. Caltrans Trash Control Compliance Progress by Structural and Institutional Controls

Trash Control Compliance Action	Cumulative Acreage by June 30, 2025 (acres)	Projected Cumulative Acreage by June 30, 2026 (acres)
On-system Trash Capture Systems	1,218	1,725
Off-system Trash Capture Systems	4,079	4,260
Structural Control Subtotal	5,297	5,985
Vegetation Controls	346	2,000
Enhanced Maintenance Measures (Trash Collection and Freeway Sweeping)	1,761	5,500
Delegated Litter Collection Agreements and Encampment Deterrent Measures	253	550
Alternative Compliance	730	800
Institutional Control Subtotal	2,744	8,850
Total Compliance	8,041	14,835

In summary, since the 2024 CDO benchmark, Caltrans has continued to make progress in implementing structural trash controls, developing new cooperative projects, and completing studies to control trash discharges from its Bay Area right-of-way. CDO Provision 5 requires Caltrans to reassess its ROW to determine the remaining extent of significant trash generating area; that is, the area from which trash must still be controlled in addition to the 8,800 acres of significant trash generating area initially identified in 2018 and required by the CDO to be controlled by June 30, 2026. To achieve the 2026 and final CDO benchmarks, Caltrans must also build on recent progress to continue identifying more structural control implementation opportunities and complete studies to demonstrate enhanced maintenance achieves full trash capture equivalency. The additional efforts include the following:

- Continue to expedite implementation and greatly increase planned implementation of structural controls, which includes the need to complete the pilot testing and implementation of Hydrodynamic Separator (HDS) units and

Multi-Gross Solids Removal Devices (multi-GSRDs) to allow Caltrans to control trash from large drainage areas to achieve CDO compliance.

- Continue to identify and support the planning and construction of new off-right-of-way local partnership projects, especially with the Bay Area municipalities that are challenged to meet the 2025 100 percent trash control deadline of the Municipal Regional Stormwater Permit.
- Continue its granular corridor-based trash control feasibility evaluations, prioritizing highway corridors with very high and high trash generating areas, to identify additional trash reduction opportunities for the remaining prioritized highway corridors in Alameda, Santa Clara, and Contra Costa counties. The assessments should prioritize high and very high trash generating highway interchanges where installation and maintenance of structural controls may not be constrained by worker safety issues.¹ Additionally, many low-lying highway corridor segments near the San Francisco Bay (Bay) could present potential trash control opportunities by integrating results from the climate change adaptation assessments, such as retrofitting undersized pipes and pump stations.
- Develop high-value and innovative trash reduction strategies for very high and high trash generating highway segments where trash capture device installation and maintenance and/or enhanced maintenance measure implementation are constrained, for example due to safety issues and limited right-of-way. We encourage Caltrans to think outside the box to maximize trash control actions on those areas, even where achieving full trash capture may be currently infeasible, and to identify future adaptive management measures that could, over time, address or avoid the constraints sufficient to achieve full trash capture. Caltrans must take an adaptive management approach to minimize trash discharge to high-value sensitive species habitats, such as marsh wetlands close to the Bay; e.g., implementing combinations of trash control measures, such as installing vegetation strips in the buffer zone between roadway and wetland, and combining vegetation controls with maintenance activities.

The remainder of this staff summary report provides the background that led to the CDO and additional details on:

- compliance with CDO benchmarks
- cooperative trash control implementation projects with municipalities
- right-of-way trash control projects
- roadside vegetative control protocol

¹ These could include, but are not necessarily limited to, the following interchanges: Interstate 280 and State Route 87; State Routes 85 and 17; Interstates 680 and 880; Interstate 580 and State Route 13 (Berkeley and Oakland), Interstate 580 and Grand Ave. (Oakland), and U.S. Highway 101 and State Route 87.

- studies in progress to substantiate the claimed trash control benefits for enhanced maintenance measures.

BACKGROUND

Consistent with the requirements of the Caltrans Statewide NPDES Municipal Stormwater Permit ([Order No. 2022-0033-DWQ](#)) and the [Statewide Trash Amendments](#) to the Water Quality Control Plans for Ocean Waters and for Inland Surface Waters, Enclosed Bays, and Estuaries, Caltrans must control discharges of trash from significant trash generating areas of its right-of-way by no later than 2030. The Board adopted the CDO because Caltrans had not appropriately characterized significant trash generating areas within its right-of-way or proposed an acceptable plan and schedule to timely control trash discharges via full trash capture devices or full trash capture equivalency controls. The CDO established the following enforceable right-of-way acreage of trash control benchmarks and a schedule for their achievement, as well as planning and reporting requirements sufficient to demonstrate that Caltrans will substantially control trash discharges from the significant trash generating areas on its right-of-way by 2026 and fully control those discharges by 2030.

- 2,000 acres or more by June 30, 2020;
- 4,000 acres or more by June 30, 2022;
- 6,000 acres or more by June 30, 2024;
- 8,800 acres or more by June 30, 2026; and
- All additional significant trash generating right-of-way areas identified by visual assessments conducted in 2022, 2025, and 2029 by December 2, 2030.

Trash control is typically accomplished by implementing full trash capture devices or a combination of alternative measures equivalent to full trash capture, such as source controls to prevent the discharge of trash in the first place, and by removing trash from streets and highways, including adjacent right-of-way, before it can discharge to the storm drain, such as by street sweeping or maintenance crews.

We have met monthly with Caltrans staff to discuss Caltrans' ongoing work to control trash and meet CDO benchmarks. We also met jointly with Caltrans and Save the Bay in April, September, and November 2025 to discuss Caltrans' progress and compliance status with the CDO benchmarks. Below is a summary of developments since the December 2024 Board update.

On Right-of-way Structural Control Implementation, Cooperative Projects, and Hydrodynamic Separator (HDS) and Multi-Gross Solids Removal Devices (Multi-GSRDs) Pilot Testing

The Annual Report documents trash control progress Caltrans achieved since June 2024 by installing structural trash control devices within its right-of-way and delivering cooperative implementation projects with local municipalities. Since June 2024, Caltrans has implemented new on-right-of-way trash control devices and funded off-right-of-way

local partnership projects to control trash from an additional 600 acres of right-of-way, with an additional projected 700 acres of structural implementation by June 2026. As shown in Table 1, Caltrans will achieve nearly 6,000 acres of right-of-way treated by 2026 by structural trash capture projects, making up approximately 68 percent of the CDO's June 30, 2026 benchmark of 8,800 acres of significant trash generating areas controlled for trash.

Since December 2024, Caltrans staff has continued efforts to identify new municipal partners for cooperative projects to install trash capture devices that control trash from both Caltrans and the municipalities' right-of-way. By June 2025, Caltrans' local partners have delivered 36 trash control projects that are in active construction or advertised for construction, contributing to an accumulated total of 3,060 acres toward the 2026 benchmark. Caltrans must continue its coordination and outreach efforts to keep current projects on schedule and identify potential new cooperative projects by working with municipalities that may need funding support to achieve the June 2025 trash reduction deadline in the Municipal Regional Stormwater NPDES Permit. Recently, Caltrans and local project partners (Oakland and Richmond) developed two new cooperative trash control projects, which will treat over 160 and 3,700 acres of Caltrans and municipal right-of-way. We will continue to support these collaborative efforts to control trash, which will provide significant water quality benefits to disadvantaged communities.

Caltrans is in the process of reviewing opportunities to expand its current toolbox to incorporate new and/or currently Caltrans-unapproved devices (e.g., hydrodynamic separators and multi-gross solid removal devices). Expanding the on-system structural efforts will allow Caltrans to reduce its dependence on the ongoing implementation of non-structural controls to meet future benchmarks, especially for areas where it is less practicable to frequently implement enhanced maintenance measures. With the construction of the testing devices completed in 2024, Caltrans is moving into the two-year pollutant removal and maintenance safety monitoring phase of the pilot. Although the pilot testing is still in progress, these large trash capture devices are being included as part of the 2025 feasibility study to help identify potentially viable locations for installation. The 2025 trash control feasibility study, which will be completed by December 31, 2025, will describe the feasibility of installing large trash capture devices within its right-of-way to allow large Caltrans drainage areas to be treated to achieve CDO compliance.

Trash Discharge Study for Enhanced Maintenance Measures and Vegetation Controls

The Annual Report also describes Caltrans' projected compliance toward the 2026 CDO benchmarks through implementation of enhanced maintenance measures and vegetative trash controls on approximately 4,500 acres of Caltrans' Bay Area right-of-way (Table 1). The Annual Report proposes approximately 4,166 acres of significant trash generating areas that Caltrans claims have been converted to low trash generation through implementation of enhanced maintenance measures, verified by three annual on-land visual trash assessments from 2023 to 2025. As we noted in the

2024 Staff Summary Report, our evaluation of the enhanced maintenance measures, including field inspections in November 2023 and September 2024 of over 1,000 acres of Caltrans' significant trash generating areas where the measures are being implemented, found that trash control maintenance activities have improved conditions on much of Caltrans right-of-way. However, we found highway segments where measures are not being conducted at a level sufficient to convert a significant-trash generating area to low trash generating or achieve full trash capture equivalency. Therefore, in 2023, Caltrans initiated a three-year trash discharge study to demonstrate maintenance effectiveness by monitoring the amount of trash entering storm drain inlets at 70 sites statewide, including the San Francisco Bay and Los Angeles regions, and northern California counties. The 26 study locations in the San Francisco Bay Region have baseline trash generation rates that vary from Low to Moderate, High, and Very High.

The study's goal is to demonstrate that enhanced maintenance measures, as currently implemented by Caltrans to control trash, can achieve the full trash capture equivalency standard by reducing the trash discharge to a Low level, and to evaluate the level of effort needed for maintenance measures to achieve that standard. The study is:

- documenting the timing, types, and frequencies of maintenance activities that are implemented during the study
- categorizing the types of trash that are effectively controlled by enhanced maintenance measures
- correlating the observed trash volume with visual assessment ratings from an acceptable visual assessment methodology
- incorporating appropriate performance standards
- utilizing an adaptive management approach to identify and maintain a level and frequency of maintenance that controls trash discharge to a low level

In October 2025, Caltrans proposed an Interim Maintenance Crediting Framework utilizing data collected both from the trash discharge study and the on-land visual assessments. This interim crediting method uses a subset of the 4,166 acres of enhanced maintenance credits along with discharge study results to-date for Moderate-rated study locations that are measuring Low trash discharge rates (less than 5 gallons per acre per year). Results from the Year 1 and Year 2 monitoring study show that 13 of the 14 Bay Area highway study locations (with Moderate baseline ratings) reported low trash discharge rates (less than 5 gallons per acre per year), indicating a conversion rate of 93 percent based on data to date. Additionally, 1,761 acres of the 4,166 acres of proposed enhanced maintenance compliance credits received "low" ratings in the second of two on-land visual assessments conducted in 2023 and 2025. Applying the observed conversion rate of 93 percent to the 1,761 acres that received "low" rating in the second of two visual trash assessments, would yield approximately 1,638 acres of interim compliance credits for CDO compliance.

We think this is a conservative approach to recognizing the benefits of enhanced maintenance measures in Moderate-rated significant trash generating areas on Caltrans right-of-way, as it only applies discharge data statistics to twice-verified corridors that received low ratings. To sustain the compliance credits claimed, the following must be addressed:

- Continue to collect more data from the existing and new study sites that are representative of highway drainage characteristics to avoid data uncertainty. Caltrans had to decommission 15 study sites due to worker safety issues, and they must expedite the replacement of those sites and addition of new monitoring sites and extend the monitoring period as needed to ensure that sufficient data is collected to inform valid conclusions. The interim enhanced maintenance compliance credits will be reevaluated and adjusted as more data statistics become available at the study completion.
- Secure the funding and resources needed to continue implementing enhanced maintenance measures at the level of effort necessary to achieve a Low trash generation rate on the 1,638 acres of right-of-way. Caltrans must perform regular visual inspections to track, monitor, and report the trash regeneration conditions. Caltrans should develop an adaptive management plan to be implemented if visual assessments indicate a shift of trash regenerating rating from Low to Moderate, High, or Very High. As appropriate, Caltrans should adjust the compliance acres. The adaptive management plan could include measures such as increasing maintenance frequencies to a level needed to remove trash to a full trash capture equivalency level.

The Annual Report also claims vegetation control credits toward the 2026 benchmark. Our September 2024 joint field inspection with Caltrans evaluated areas where Caltrans, based on desktop modeling, plans to claim compliance toward CDO benchmarks based on a combination of roadside vegetation and trash pickup that they claim is sufficient to control trash prior to entering the storm drain system. During our field inspections with the Caltrans team, we observed some vegetation control areas, as identified solely by the desktop review, are hydraulically disconnected from the drainage tributary. That is, runoff does not flow through them, so they do not control trash in runoff. Other areas had sparse vegetation receiving concentrated flow from the nearby pavement, indicating a limited ability to trap trash, resulting in the potential discharge of trash to the storm drain. We also observed areas with dense, tall vegetation that receive sheet flow from pavement that had not been identified by the desktop delineation modeling, but which seemed likely to qualify as vegetation control areas. These were areas for which Caltrans could claim trash control credit but was not yet claiming it.

Our joint field inspections identified the need to evaluate and confirm desktop modeling results in the field prior to reporting vegetation control credits in the Annual Report. Field verification validates desktop modeling outputs related to vegetation conditions and tributary drainage areas, and identifies potentially deficient areas, such as those with sparse vegetation, inaccurate drainage connectivity, or where trash may bypass existing vegetation barriers via stormwater-generated flow paths. Accordingly, Caltrans

developed a Vegetation Control Compliance and Delineation Protocol (Protocol) for Moderate trash-generating areas. Some critical Protocol improvements developed during the past year to improve vegetation delineation and verify tributary drainage connectivity are:

- Verify in the field any newly proposed vegetation control areas claimed for CDO compliance. Prior to reporting any new vegetation control credits in annual reports, at least 25 percent of the newly claimed areas need to be field verified for vegetation conditions, drainage connectivity, and needs for supplemental engineering controls.
- Conduct annual field inspections of 20 percent of the vegetation control areas claimed in previous years to ensure sustained compliance. This is needed to ensure previously claimed vegetation control areas continue to detain trash to a full trash capture equivalency level.
- Supplement potentially deficient areas with engineering control measures. For example, install screen-type covers around drainage inlets receiving concentrated flow from pavement where the vegetation condition is insufficient to trap trash to a full trash capture equivalency level.

Looking to the 2026 benchmark, Caltrans will need to continue field verifying areas claimed as compliant following procedures outlined in the Protocol and report the inspection results in the annual report. Caltrans must also evaluate, track, and report the maintenance frequency in the annual report to demonstrate that routine maintenance expectations for removing trash from vegetation areas are being met and compliance credits are sustained. The Protocol should also include an adaptive management plan that allows for increased maintenance activities when there is evidence of trash remobilization between maintenance events.

Feasibility Studies and Trash Generation Reassessments

CDO Provision 5 requires Caltrans to perform trash reduction feasibility studies on ten percent of significant trash generating right-of-way by December 31, 2019, 50 percent by December 31, 2021, and 100 percent by December 31, 2025. The feasibility studies are intended to help Caltrans plan and program stand-alone trash control implementation projects and cooperative trash implementation projects with municipalities and prioritize trash controls in its significant trash generating areas. Through Dec 2025, Caltrans completed a series of focused corridor-based feasibility study workshops for three prioritized highway corridors in the Bay Area to ground-truth trash control feasibilities along U.S. 101, Interstate-880 (I-880), and I-580/I-80 corridors. We participated in both desktop reviews and field visits with Caltrans staff to ground-truth trash control feasibilities in U.S. 101, I-880 and I-80 corridors. This is intended to help Caltrans prioritize assessments and implementation of trash controls in remaining uncontrolled very high and high trash generating highway corridors to optimize use of Caltrans resources and expedite planning and implementation of trash controls on its right-of-way. We are pleased with the progress that has been made in documenting project-specific and corridor-based trash control implementation feasibility determinations.

Although the completed corridor assessments identified challenges with implementing increased trash control to achieve full trash capture equivalency, Caltrans needs to evaluate and implement innovative methods to maximize trash controls. This includes: 1) implementing combinations of trash control measures, such as vegetation controls and enhanced maintenance; 2) identifying trash control opportunities by climate change-driven drainage system retrofit evaluation, such as pump stations, undersized culverts; and 3) completing the pilot testing to allow installation of large trash capture devices for controlling trash discharge from areas that are currently excluded from trash controls. For example, based on the desktop reviews and field visits we participated in with Caltrans staff for the U.S. 101 corridor from Interstate 380 (I-380) near South San Francisco to Shoreline Boulevard near Mountain View, there is a need to reassess certain locations currently deemed infeasible for trash controls. The reassessment should consider: HDS units based on the current pilot testing of HDS units, which has an expected completion date of 2026; assessing three pump stations for trash control retrofit; and evaluating drainage retrofits as part of Caltrans' climate change adaptation efforts in response to sea level rise and extreme storm events.

Caltrans will submit a trash reduction feasibility study report assessing the entire significant trash generating areas on Caltrans' right-of-way by December 31, 2025. Caltrans must describe, in this report, a plan to continue the detailed corridor-based feasibility analyses, as these granular assessments are extremely valuable for identifying additional trash control implementation opportunities and demonstrating potential right-of-way constraints. We look forward to continuing to engage with Caltrans on these focused corridor-based studies to maximize trash control opportunities.

In 2016 and 2018, Caltrans conducted visual trash assessments of its right-of-way within the San Francisco Bay Region and identified approximately 8,820 acres of right-of-way as significant trash generating areas. Significant trash generating areas are defined as all moderate or greater trash generating areas. The CDO requires Caltrans to periodically reassess its right-of-way to determine the remaining extent of significant trash generating areas; that is, the area from which trash must still be controlled in addition to the 8,800 acres of significant trash generating area initially identified and required by the CDO to be controlled by 2030. Caltrans will conduct visual trash assessments to evaluate its existing low-rated areas and will submit the results by December 31, 2025. The 2022 visual assessments, which were conducted following Caltrans' existing Driving On-land Visual Trash Assessment Protocol, showed substantial shifts from Low to Moderate, High, and Very High trash ratings. Caltrans is refining the visual assessment methodology to better capture the representative trash generation conditions in its right-of-way. We have worked with Caltrans to ensure the assessments are conducted using an appropriate visual trash assessment methodology. We will review the assessments once they are submitted and will work with Caltrans as they develop trash control plans for the remaining significant trash generating areas.

SUMMARY

Since the 2024 CDO benchmark, Caltrans has continued to make progress in implementing structural trash controls and developing new cooperative projects to control trash discharges from its Bay Area right-of-way. Caltrans needs to continue to expedite current implementation and greatly increase planned implementation of structural controls, which includes the need to expedite the implementation of HDS units and multi-GSRDs upon completion of pilot testing.

As Caltrans projections rely on enhanced maintenance measures and vegetation to control trash to meet the June 30, 2026 8,800-acre benchmark, Caltrans must finish the Trash Discharge Study to identify appropriate locations and the level of effort needed to achieve full trash capture equivalency. The Interim Maintenance Crediting Framework intends to recognize the trash control benefits for enhanced maintenance measures utilizing results from both the trash discharge study and visual assessments. However, the provisional compliance credits may be revised to align with the final study conclusion. We have engaged with Caltrans and State Water Resources Control Board staff on several technical workshop discussions through 2025, and we will continue to work with Caltrans to monitor progress, to ensure that sufficient data is collected to support the study's findings, and to identify any needed follow-up actions. If, at the study's conclusion, Caltrans demonstrates that a consistent type and frequency of maintenance actions result in full trash capture equivalency, Caltrans must have the resources needed to implement the enhanced maintenance into the future, including the long-term maintenance resources to implement, monitor, track, and report trash maintenance activities to ensure CDO areas are controlled to a consistently low trash generation condition.

Caltrans also needs to continue verifying areas claimed as compliant using vegetation controls, following procedures outlined in the Protocol. This includes field verifying at least 25 percent of the newly claimed vegetation control areas and 20 percent of the areas claimed in previous years. Field verification should focus on vegetation conditions, drainage connectivity, and any need for additional engineering controls. Field inspection results should be included in the annual reports, along with records of trash removal frequencies, to show that routine maintenance for removing trash from vegetation areas is being performed and that compliance credits are sustained.

The CDO requires submittal, by December 31, 2025, of an updated Trash Control Implementation Workplan that describes how Caltrans will plan, fund, and implement trash control measures sufficient to meet CDO benchmarks, and a Feasibility Study Report that assesses the feasibility of implementing trash controls in Caltrans' right-of-way in the region by December 31, 2025. Caltrans must describe in these submittals, a plan to continue the corridor-based trash control feasibility assessments and identify additional trash control project opportunities for the remaining significant trash generating areas identified by the 2025 visual trash reassessments. These submittals will provide staff with important information to assess progress and projections toward meeting the 2026 and the final trash control benchmarks.