

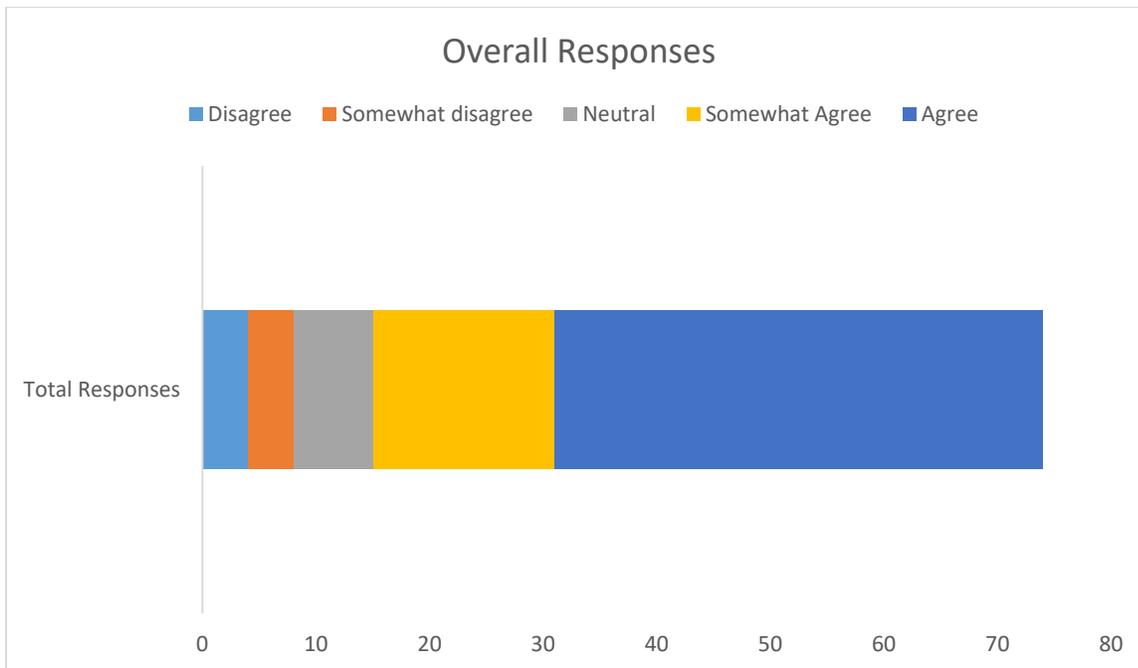
2018 NPDES Permit Outreach Section Survey of Jurisdictions

For more information, contact Tiffany O'Dell, Pierce County (253) 798-2468; todell@co.pierce.wa.us

During Summer 2016, Stormwater Outreach for Regional Municipalities (STORM) led an effort to survey jurisdictions in Western Washington about the outreach section of the Phase I and II municipal stormwater permits. The following are the results of the survey. Results include multiple choice answers and additional comments submitted by jurisdictions.

1. 72 out of 92 Western Washington municipal permittees responded to the survey
2. It is important that jurisdictions continue to use the Puget Sound Starts Here campaign to raise awareness about stormwater runoff and the simple steps residents can take to prevent pollution. Public awareness is an important issue that will make residents more open to behavior change. Implementing awareness programs on a regional basis is more effective, because it provides a consistent and effective message to residents about the problem. The awareness section of the permit should be clarified to make it clear that promoting the Puget Sound Starts Here campaign meets the intent of this section.

Overall Totals: 4/4/7/18 (25%) /43 (59%)



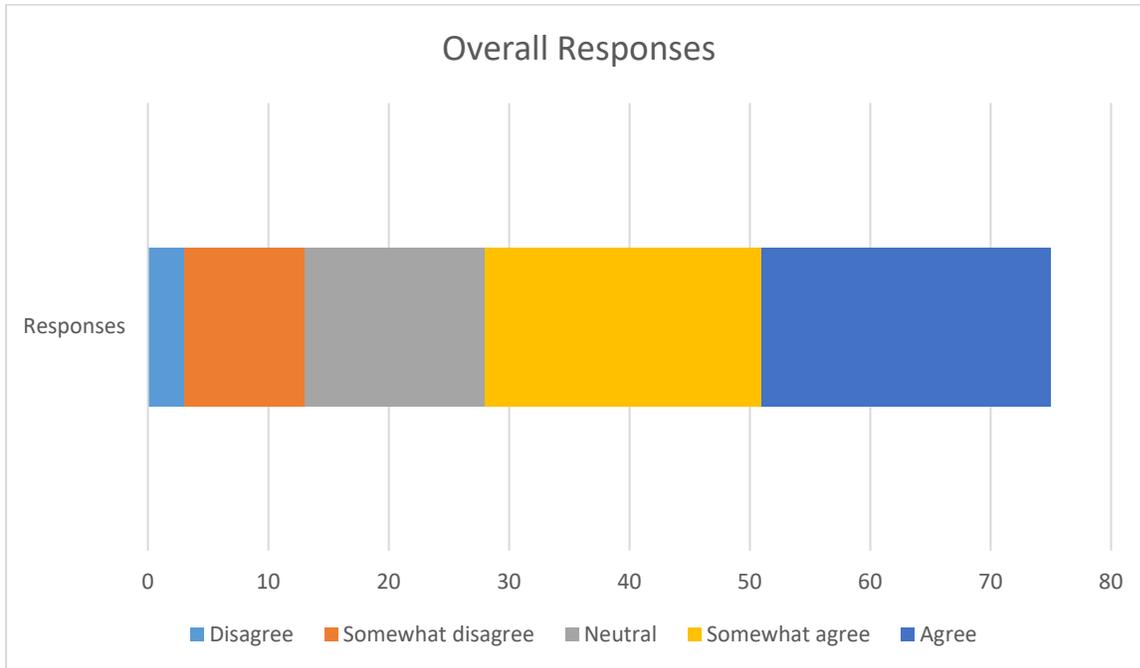
Comments were generally positive towards using the Puget Sound Starts Here campaign as meeting the awareness and education component of the permit. Most critiques of the premise of the question revolved around the difference between western Washington and the Puget Sound region; not all jurisdictions meet both criteria and the messaging may not be applicable to jurisdictions along the Columbia River or Willapa Bay. Other respondents questioned the messaging of PSSH directly. A few were concerned that there wasn't a way to measure the effectiveness of the campaign. These folks didn't dispute the value of a regional approach to education and outreach, but rather if PSSH was an effective precursor for behavior change. One respondent questioned if PSSH was meaningful for diverse audiences compared to more direct messaging like, "Dump no waste, drains to streams". The gist of several comments was that the regional messaging behind PSSH should be revisited.

2018 NPDES Permit Outreach Section Survey of Jurisdictions

For more information, contact Tiffany O’Dell, Pierce County (253) 798-2468; todell@co.pierce.wa.us

3. Ecology should require a regional or statewide spill hotline and encourage jurisdictions to work regionally to promote it.

4/10 (14%) /15 (21%) /23 (32%) /24 (33%)



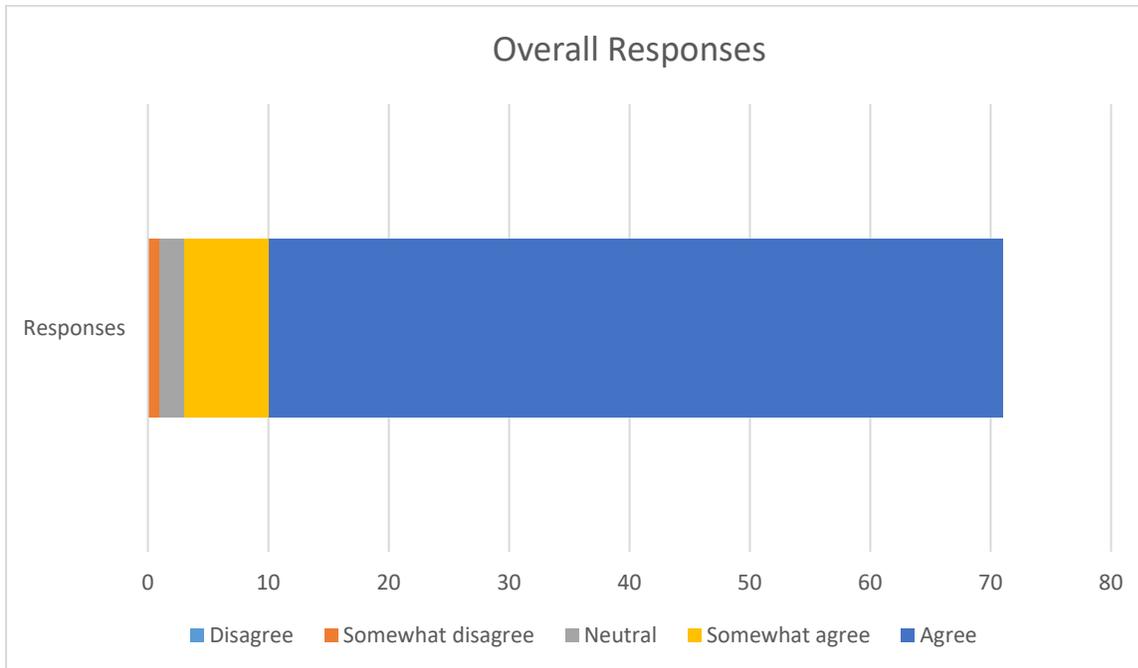
Attitudes expressed in comments were divergent, many respondents had differing ideas about how a new regional or statewide spill hotline would look. Some wondered about the existing ERTS system, and thought it worked fine, while still more would like to see a reworking of ERTS – to either combine spills IDDE for a unified stormwater hotline, or increased funding and staffing. The largest criticism of the idea, a regional/statewide hotline to be promulgated, wouldn’t be as responsive or effective as local lines since they are more responsive and geographically knowledgeable. A few respondents supported the idea of a single number to call for folks by noting that people often don’t know which jurisdiction to call, they may not know where they are, and that it should be as easy as possible for citizens – something a single number does. A handful objected to being required to support it, preferred it to be optional, and were concerned about how such an effort would be funded given ongoing funding concerns at the state level.

2018 NPDES Permit Outreach Section Survey of Jurisdictions

For more information, contact Tiffany O'Dell, Pierce County (253) 798-2468; todell@co.pierce.wa.us

4. Jurisdictions should be allowed to choose those behavior change programs which are most relevant and will have the most impact in their jurisdiction in order to focus time and resources. They should not be required to implement every behavior change program prescribed in the permit. For example, jurisdictions should have the ability to choose to focus outreach on those topics related to a TMDL or identified water quality program in their jurisdiction. Phase 1s have been required to implement programs not relevant in their jurisdictions, which has been detrimental to the quality and reach of all of their outreach programs.

0/1/3/8 (11%) / 63 (86%)



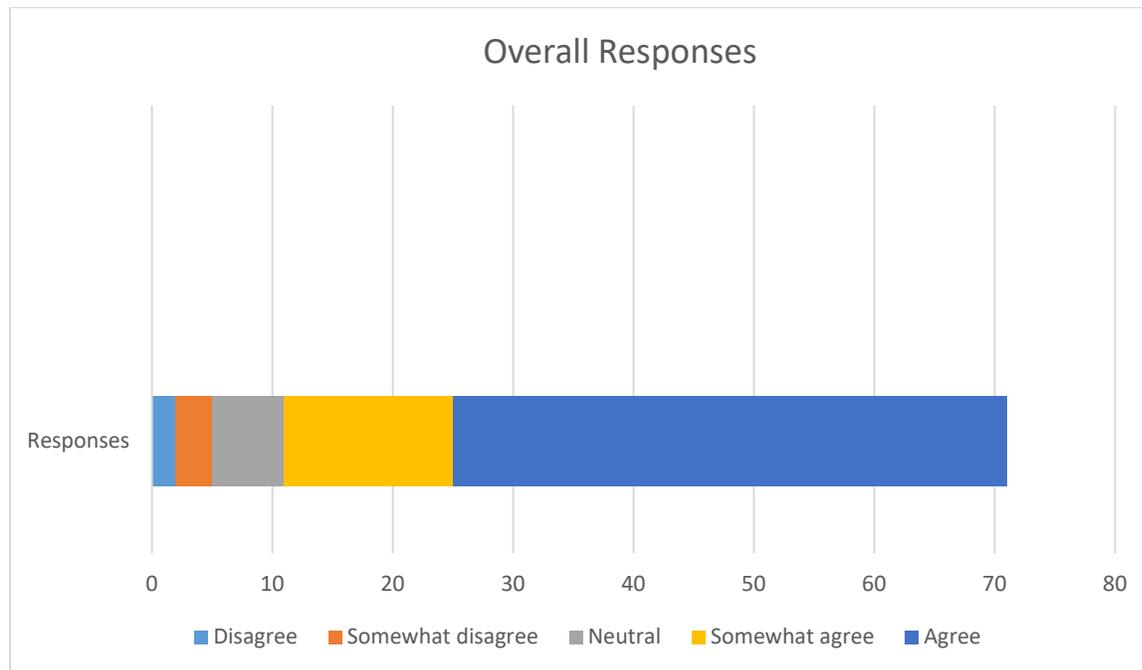
The majority of comments for question 4 were positive. Commenters remarked that they strongly agreed with the idea of flexibility based on local needs. Many commented that jurisdictions should link outreach programs to local water quality concerns, especially those of highest priority or concern. Some commented that jurisdictions should provide justification, while others did not mention justification. Several commented that implementing programs that are irrelevant siphons resources away from locally relevant programs and wastes public funds. Smaller jurisdictions tended to comment that Ecology or STORM programs should continue to provide quality program examples that could be easily adopted. A few commented that this was more likely a problem limited to Phase 1s, as the permit is currently written, because Phase 2s have flexibility to implement programs of their choice. Two commenters warned that such flexibility should be implemented, however guards should be in place to ensure additional flexibility does not allow jurisdictions to opt-out of implementing outreach programs.

2018 NPDES Permit Outreach Section Survey of Jurisdictions

For more information, contact Tiffany O'Dell, Pierce County (253) 798-2468; todell@co.pierce.wa.us

5. The goal of the outreach section of the permit should be to effect long-term, sustainable behavior change related to water quality issues. The 2013 permits made it difficult for jurisdictions to implement effective, long-term behavior change programs. In almost all cases, behavior change programs require years of consistent investment to reach audience saturation, and as such jurisdictions should be required to invest in the same programs over time to be effective. Rather than prescribing a long list of programs, the focus should be on high quality, effective programs.

2/3/6/15 (21%) /49 (67%)



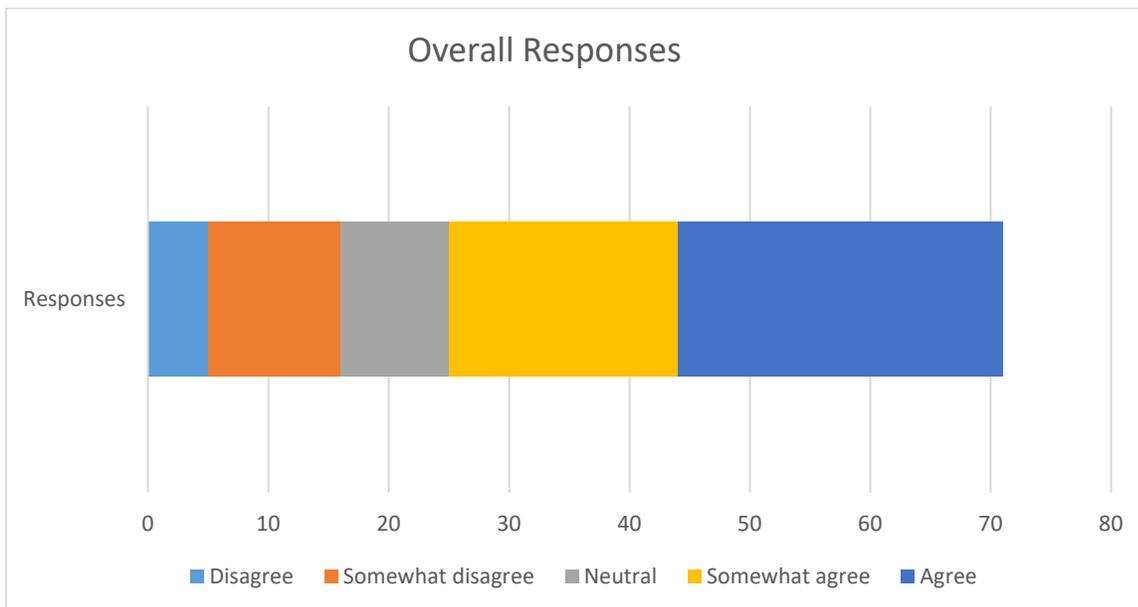
Several jurisdictions commented that this has been less of a problem for Phase 2s, because they have more flexibility in their permit to choose to implement the same program year-after-year, and as such are able to invest more in quality programming. For Phase 1s, this has been a serious struggle - resources are pulled away from high-quality programs to “check-the-box” for implementation of required programs. Several jurisdictions commented that they have had success partnering with other jurisdictions or regional groups to implement stronger programs than they would have been able to implement individually. Several also clarified that this is a generalization – some problems only require short-term programs, while others require long-term investment. Many commented that it should be up to the jurisdiction to determine when a program has run its course either by achieving its goals, or becoming ineffective. In this case, jurisdictions should have the option of changing their programs.

2018 NPDES Permit Outreach Section Survey of Jurisdictions

For more information, contact Tiffany O'Dell, Pierce County (253) 798-2468; todell@co.pierce.wa.us

6. Because permittees differ significantly in population size, it would be beneficial to all if the number of behavior change programs required were based on population, not permit type. For example, jurisdictions with a population of 40,000 or fewer should have 1 program, jurisdictions sized between 40-80,000 should have 2 programs, jurisdictions 80-120,000 should have 3 programs, jurisdictions 120-200,000 should have 3 programs, jurisdictions 200-400,000 should have 4 programs, jurisdictions with more than 400,000 should have 5 programs. Allowing jurisdictions to make program investments proportional to the population of that jurisdiction will result in more resources invested in fewer, high quality programs, instead of spreading funding over many low-quality programs.

5/11 (15%) / 11 (15%) / 20 (27%) / 28 (38%)



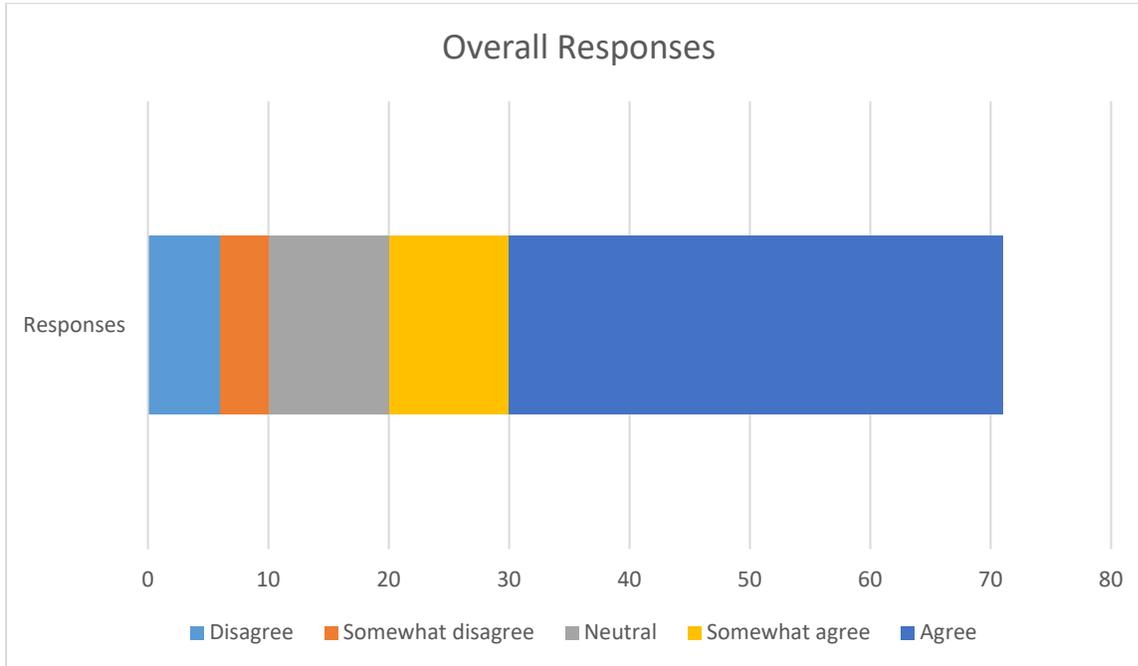
While many jurisdictions agreed that the number of programs required is problematic, many commented that correlating the number of required programs to population is not the right approach. Some commented that there are jurisdictions where water quality concerns are significant despite small population size. They argued that burden of program implementation should be higher based on the number of water quality concerns, not population size. Several commented that even at the proposed levels this approach could spread resources too thin, proposing only one program focus per jurisdiction. Many commented that the approach of jurisdictions doing multiple programs leads to hastily implemented programs instead of deeper, higher quality programs. A few commented that regional or watershed approaches allow for jurisdictions of all sizes to implement high quality programming. A few commented that partnerships should be incentivized.

2018 NPDES Permit Outreach Section Survey of Jurisdictions

For more information, contact Tiffany O'Dell, Pierce County (253) 798-2468; todell@co.pierce.wa.us

7. The permit should continue to include the requirement for jurisdictions to provide opportunities for stewardship activities. Jurisdictions like receiving credit for good work such as this, and it provides an excellent opportunity to form partnerships with non-profit organizations working locally.

6/4/10 (14%) / 12 (16%) / 43 (59%)



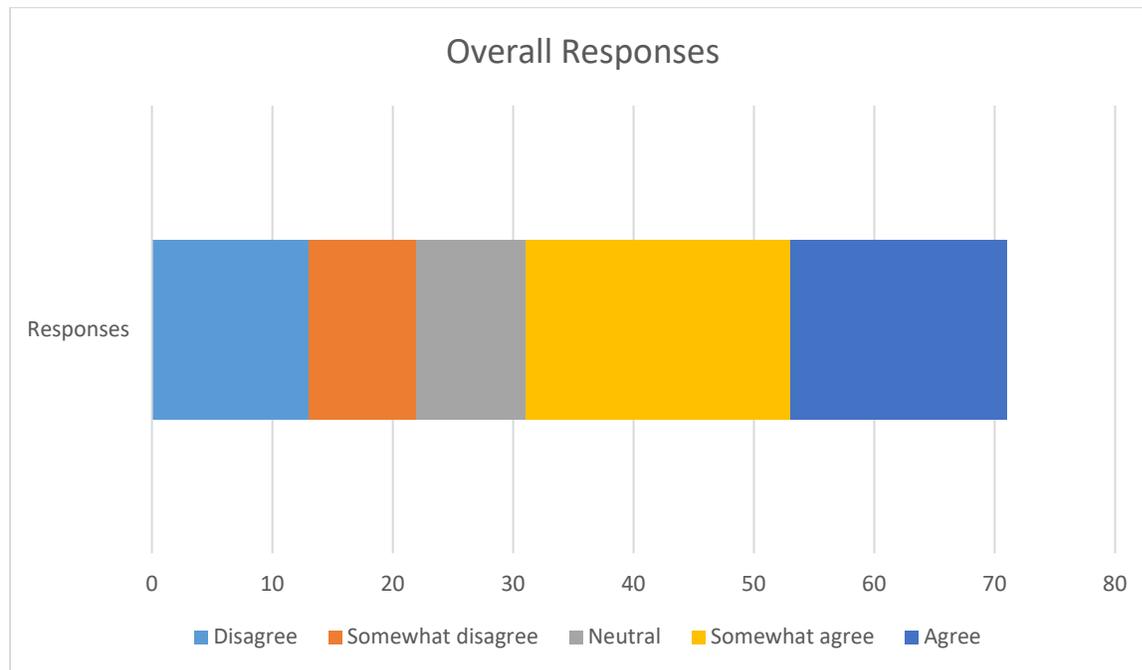
A near-consensus narrative from the comments was that the permit requirement of providing opportunities for stewardship activities was vague and difficult for the smaller jurisdictions who lack a specific education and outreach full-time staff person. Many offered ways to, as they saw it, improve the permit. These included having Ecology provide a guidance document on the activities that qualified as stewardship, incentivizing rather than requiring stewardship partnerships, or goals for what should be accomplished. Though most respondents favored partnership for stewardship, some questioned the need for including NGOs, or using partnerships on water quality problems compared to other activities like restoration work. Though generally receptive, respondents expressed a preference for loosening stewardship requirements while clarifying the options jurisdictions had to fulfill the requirement.

2018 NPDES Permit Outreach Section Survey of Jurisdictions

For more information, contact Tiffany O'Dell, Pierce County (253) 798-2468; todell@co.pierce.wa.us

8. A modest amount of funding for regional awareness and behavior change programs should be required under the permit (for example \$1,000 per year for Phase 2s and \$5,000 per year for Phase 1s). Jurisdictions would be required to have representation on regional or sub-regional committees to direct how this funding is used. This funding could be used for long-term programs such as non-profit partnerships, maintenance and improvement of online tools, program evaluation, audience research and STORM network coordination.

13 (18%) / 9 (12%) / 10 (14%) / 24 (33%) / 19 (26%)



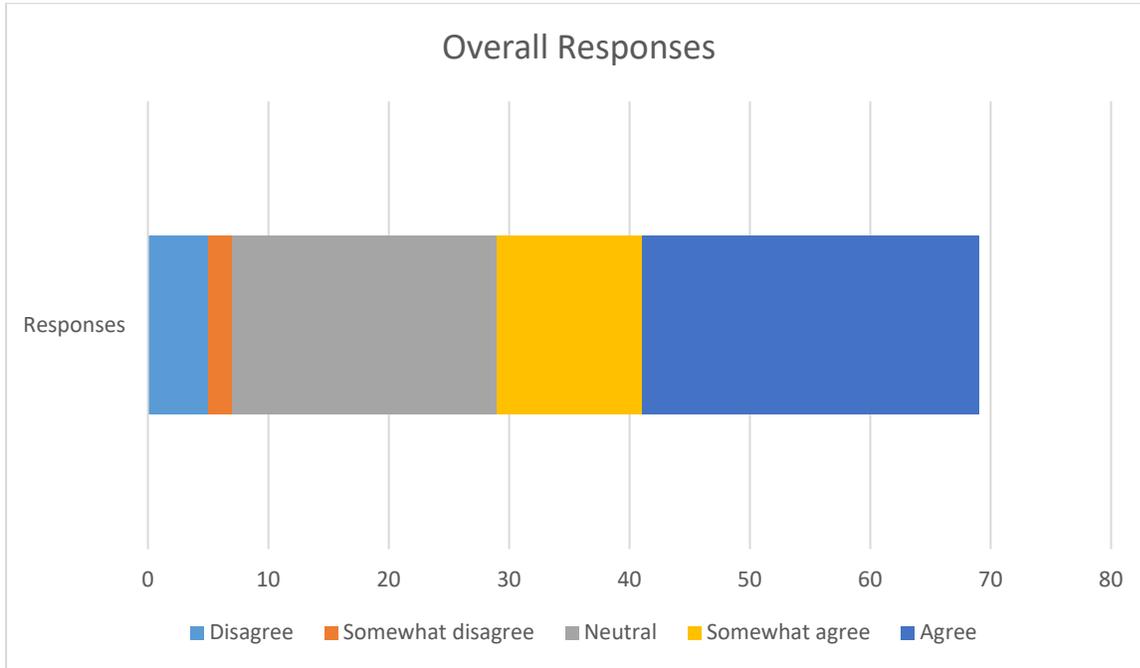
A seemingly consistent view was that pooling dollars for regional awareness campaigns was reasonable likely more impactful than non-regional efforts. Conversely, that sense didn't apply to behavior change. More respondents held that that was best done at the level of the specific jurisdiction in order to better meet citizen concerns, jurisdictional needs and be justifiable. Many smaller jurisdictions objected to being tasked to serve on an additional committee. They saw it as burdensome on their resources and disliked travelling to far-flung meetings. Others, both Phase I and II permittees, considered a fee-based approach to be an over-reach of the permit. A handful thought this a mission for STORM, assuming it would credit towards permit compliance and meeting attendance was not mandatory. Jurisdictions outside the Puget Sound Region were unsure how it would benefit them.

2018 NPDES Permit Outreach Section Survey of Jurisdictions

For more information, contact Tiffany O’Dell, Pierce County (253) 798-2468; todell@co.pierce.wa.us

9. Phase 1s and Phase 2s should be encouraged to develop campaigns that serve a multicultural audience, as appropriate, to build equity into programs. Demographic information and community knowledge should be used to determine whether a multicultural approach is needed.

5/2/23 (32%) /14 (19%) /29 (40%)



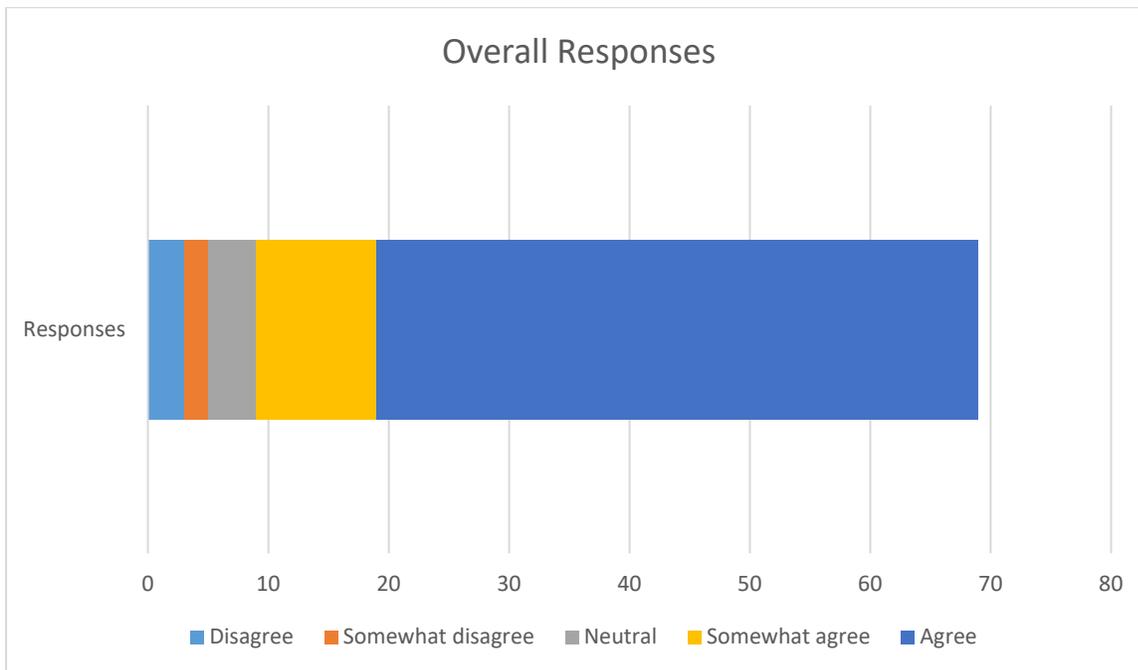
The majority of comments for Question 9 were neutral or to some degree in agreement with the statement. There is agreement among these respondents that addressing these barriers will provide more equitable and effective programs. There is support that the approaches be based on jurisdiction demographics, as each jurisdiction has different needs for this element. Among those that disagree or are neutral regarding the statement, there is concern over lack of capacity amongst smaller jurisdictions and an interest in this work being done regionally. Some also think that this should be encouraged but not required in the permit. There is also interest in addressing urban vs. rural audiences and addressing age diversity.

2018 NPDES Permit Outreach Section Survey of Jurisdictions

For more information, contact Tiffany O'Dell, Pierce County (253) 798-2468; todell@co.pierce.wa.us

10. The permit should continue to include the option for jurisdictions to implement awareness and behavior change programs and evaluation individually or as a member of a regional group. The permit should encourage jurisdictions to work together and share resources rather than develop programs in a vacuum. Smaller jurisdictions often recreate the wheel or invest in programs that have previously been deemed unsuccessful without looking outside their jurisdiction. Continuing to promote regional collaboration will result in more effective and consistent programs with wider reach.

3/2/4/12 (16%) / 52 (71%)



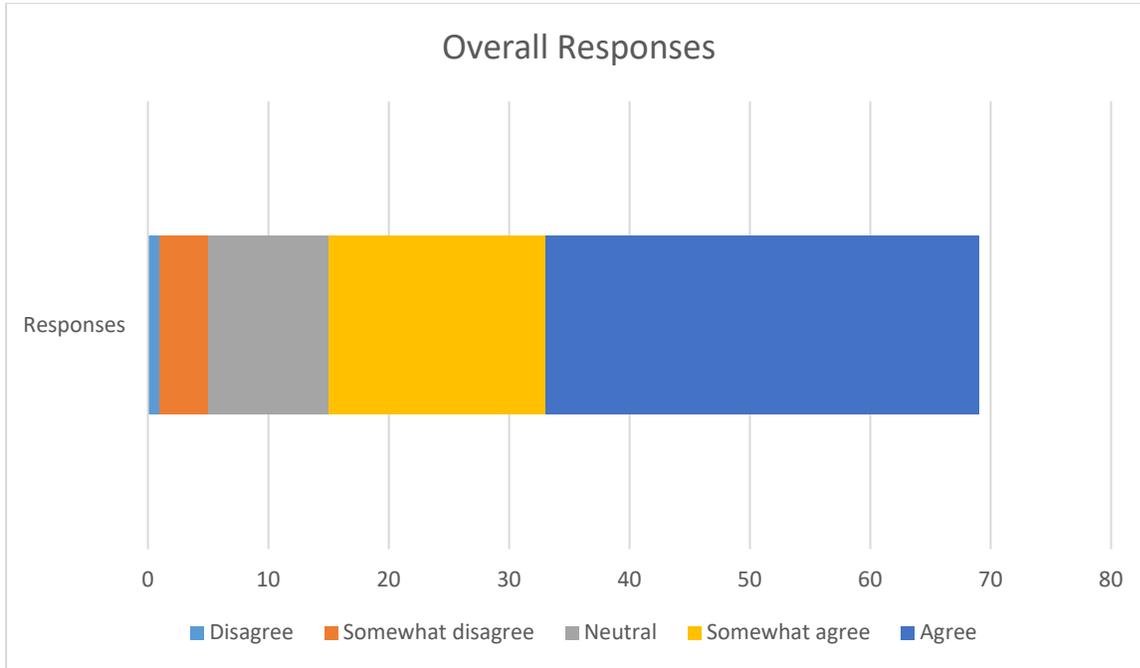
The majority of comments for Questions 10 were in strong support of the statement. There is agreement with almost all parties that there should continue to be the option of implementation and evaluation at the individual or group level. Many also stated that collaboration should continue to be encouraged but not required. There were also comments supporting evaluation of programs at a regional level rather than at local level. Many respondents, both those that agree and those that disagreed with the statement, took exception to the sentence, “Smaller jurisdictions often recreate the wheel or invest in programs that have previously been deemed unsuccessful without looking outside their jurisdiction,” considering it an incorrect assumption. There were also multiple statements asking for more support from Ecology – training, resources related to program development.

2018 NPDES Permit Outreach Section Survey of Jurisdictions

For more information, contact Tiffany O’Dell, Pierce County (253) 798-2468; todell@co.pierce.wa.us

11. Target audiences should be removed from the permit altogether or provided as suggestions that jurisdictions may choose from as appropriate for their jurisdiction. The way that target audiences are currently referenced is confusing and unnecessary.

1/4/12 (16%) /18 (25%) /38 (52%)



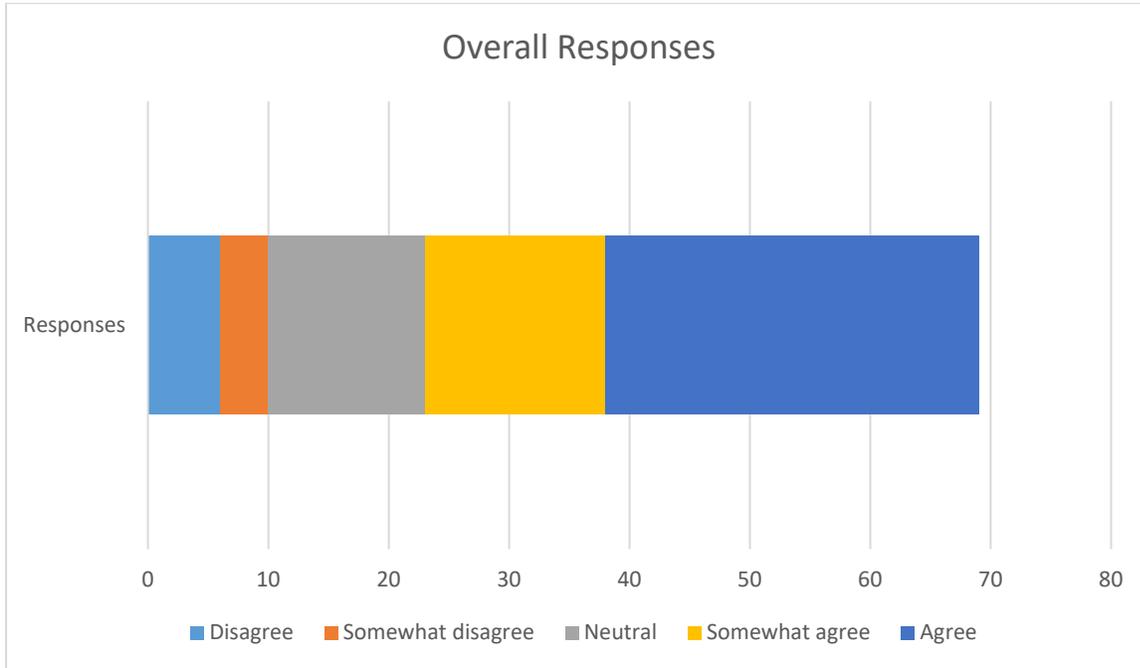
The majority of respondents are in agreement with providing suggestions or examples of target audiences, with less than 1% in disagreement. The commenters were concerned that not all jurisdictions have similar audiences and to allow for some flexibility and local analysis. Other concerns were that messages for targeted audiences may be helpful to other audiences. The audiences for each action should be very clear, to not allow too small an audience focus, and allow for certain groups such as youth.

2018 NPDES Permit Outreach Section Survey of Jurisdictions

For more information, contact Tiffany O’Dell, Pierce County (253) 798-2468; todell@co.pierce.wa.us

12. The listing of subject areas and target audiences should remain in the permit, however jurisdictions should have the option of implementing listed programs or implementing alternate programs justified by local data.

6/4/13 (18%) / 17 (23%) / 33 (45%)



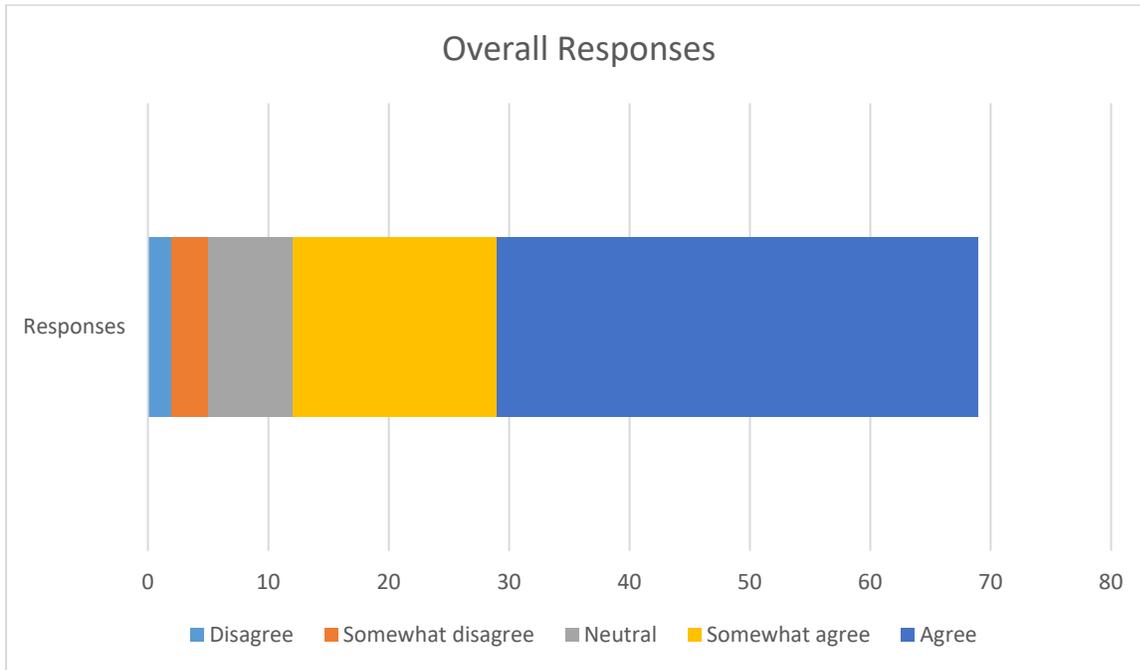
The majority of respondents are in support of giving jurisdictions the option of using local data to implement listed or alternative programs. Commenters asked to allow for justifying alternate programs without data, that a revised or optional menu of focus areas would be helpful to coordination, that flexibility and local circumstances and data matter, that justification requirements should be strong, that new programs may come out of local efforts, and that bench marks for permit compliance are needed.

2018 NPDES Permit Outreach Section Survey of Jurisdictions

For more information, contact Tiffany O’Dell, Pierce County (253) 798-2468; todell@co.pierce.wa.us

13. Ecology should place all communications, training and outreach requirements in one section of the permit, or cross-reference such requirements in the outreach section to help permittees better understand their outreach workload. For example, public participation related to the SWMP and training related to IDDE should be co-located or cross-referenced in the education and outreach section of the permit.

2/3/7/18 (25%) / 43 (59%)



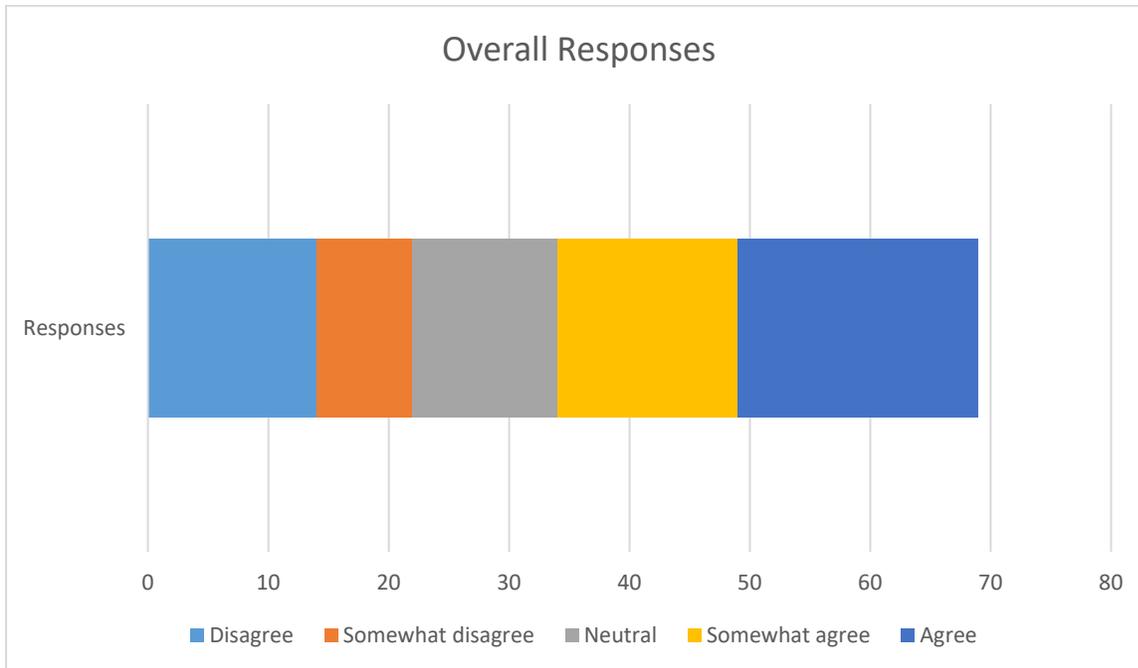
The majority of comments were in support of this option and thought it would be helpful and at the very least should be cross-referenced for clarity. Those opposed thought it was either okay the way it is now or felt that communication, training, education and outreach were all separate categories.

2018 NPDES Permit Outreach Section Survey of Jurisdictions

For more information, contact Tiffany O'Dell, Pierce County (253) 798-2468; todell@co.pierce.wa.us

14. Within the first year of the new permit, jurisdictions should create an outreach plan identifying those topics and methods they will address during the permit cycle. To guide selection of behavior change program topics and audiences jurisdictions should compile and study locally specific information and regional information (IDDE reports, 303d listings, local source control, TMDL reports and demographics, behavior surveys) and use this information to identify the most relevant and effective programs for their area. These plans could be developed as an individual jurisdiction or in partnership with other jurisdictions on a watershed or regional basis.

14 (19%) / 8 (11%) / 14 (19%) / 15 (21%) / 22 (30%)



The vast majority of comments were not in support of this option stating that this is already in the required SWMP, it is too difficult for smaller jurisdictions, this didn't align with budget cycles, or that this should be done at the regional scale only. Those in favor of this option wanted this requirement to allow for modifications, be encouraged but not required, be in lieu of something, or be required at the end of the permit term to allow sufficient time and not compete with other efforts.