

Education and Outreach Topic Group White Paper

Co-leads: Katherine Straus, STORM Coordinator and Susan McCleary, City of Olympia

The Education and Outreach White Paper identifies issues, concerns and recommendations for the Education and Outreach section of the NPDES permit gathered from permittees and partner organizations during the 2024 Permit Reissuance Ad Hoc Process. The report is organized by topic and permit section. It does not address every comment received, but rather highlights trends and common issues.

Process

The E&O Topic group convened twice between November and December. Comments were gathered via an online survey and during a virtual “Listening Session”. Permittees and partner organizations were given the opportunity to review all comments and provide additional input. The feedback gathered during the virtual meeting and the comments from the survey results were aggregated and then distilled into common themes. Due to the large participation numbers, the goal of the group was not to reach consensus, but to gather all feedback, identify trends, and then present those findings to Ecology.

Approximately 50 individuals attended the December 9th “Listening Session,” where attendees were divided into breakout rooms to discuss the E&O sections of the permit. Feedback was collected in a shared google document, provided as Appendix II. The online survey received 30 responses (27 individual municipal stormwater permittees and 3 partner agencies). Consolidated survey results and Google Slide comments, organized by topic and permit section, are provided as Appendix I.

The following information is a summary of key themes and common issues. To view all comments please see Appendix I.

Long term sustainability

Section S.5.C.2.

- Smaller and less-resourced jurisdictions feel that they don’t currently have the staff capacity or expertise to meet many of the E&O requirements as currently written. They expressed a common concern about future additions in the next permit cycle and their ability to meet additional requirements.

Section S.5.C.2.a.ii: Behavior Change

- There is consensus among Phase I and Phase II permittees that the Permit language needs to encourage long-term efforts that are refined over time to increase effectiveness, rather than jumping from program to program between permit cycles.

Local WQ Data

Section S.5.C.2.

- There was general confusion around what is meant by and what qualifies as “local water quality data.” Permittees recommend updating this language to “local and/or regional water quality data.” More information on the intent behind “local” water quality data could be included in the guidance documents.

Regional Collaboration

Section S.5.C.2.

- There was general consensus among permittees that they appreciate the option to meet E&O permit requirements through regional collaboration, however they would benefit from more information in the guidance documents on what qualifies as regional collaboration.

Section S.5.C.2.a.ii: Behavior Change

- There is consensus that being able to meet this requirement as part of a regional effort is important and jurisdictions want this to stay in the permit.

Stewardship

Section S.5.C.2.

- There was a general feeling of conflict between how stewardship was described in this section vs. how it is described in Section S.5.C.2.a.iii, specifically the use of the word “partner” vs. “promote.” Permittees would like to see more consistent language used between the two sections.

Section S.5.C.2.a.iii: Stewardship

- Permittees felt that the next permit would benefit from including language around offering opportunities through virtual engagement, as volunteers are reluctant to attend events and COVID protocols can be difficult to enforce.
- There was consensus that permittees need more examples of different kinds of activities that would qualify as “stewardship.” This would be best communicated as additional information in the guidance documents.
- There is confusion among jurisdictions about the purpose of stewardship- whether it is to maintain the MS4 or to engage the community in local watershed stewardship. The guidance documents could help clarify this with more information on what is intended by the statement “areas serviced by the MS4.”
- Permittees would also benefit from more information in the guidance documents on appropriate ways to meet the stewardship requirement through regional collaboration.

Staff Capacity

Section S.5.C.2.a.ii: Behavior Change

- Developing and implementing a behavior change program is staff and resource intensive, and most small and/or less-resourced jurisdictions don't currently have the staff capacity or expertise to meet this requirement.
- Staff and managers need more educational resources to help them better understand the staff and financial inputs needed to implement an effective behavior change program

Measurement and Evaluation

Section S.5.C.2.a.ii: Behavior Change

- Permittees need more guidance on what program evaluation looks like and what it should include. Guidance for this section should also include more information about what it means to “affect” behavior change. For example, there was concern that if a behavior change program was not successful a jurisdiction might be found to be out of compliance.
- Based on feedback, the group recommends changing the wording in this section from “measure understanding” to “measure adoption.”

Timeline

Section S.5.C.2.a.ii: Behavior Change

- Permittees feel that the timeline is too condensed in the beginning. When developing a new program, more time is needed up front for issue research (selecting behavior and audience), developing a social marketing strategy and piloting the program.
- More clarity is needed around what "implementation" means. This could include suggestions for ongoing evaluation or whether the pilot phase and/or phased implementation are included in "implementation?"

CBSM vs. Social marketing

Section S.5.C.2.a.ii: Behavior Change

- There is consensus among permittees that they would like to see the term "Community Based Social Marketing" removed from the permit in favor of "Social Marketing." Community Based Social Marketing is a specific type of social marketing championed and taught by a single individual, while social marketing is the general name used for the field of practice.

Target Audience and/or BMP List

Section S.5.C.2.

- There is consensus among permittees that the term "priority audience" should be used throughout the permit instead of "target audience." "Priority audience" is the more professionally accepted term within the education and outreach field.

Section S.5.C.2.a.i: General Awareness

- Suggestions for new audiences to include within this section were: unhoused individuals, internal audiences (staff), stormwater facility owners, and real estate professionals.
- Include 6PPD as a general awareness topic. Target audiences include the general public, businesses including tire storage, sales and recycling operations, and municipal government officials.
- Provide an additional option for audiences and behaviors that are specific to a jurisdiction (for example, wineries).

Section S.5.C.2.a.ii: Behavior Change

- Suggestions for new audiences to include in this section were: commuters, college students or young adults, and audiences identified through SMAP efforts.
- Suggestions for new BMP's to include in this section pressure washing and Adopt a Drain.

Permit language/formatting

Section S.5.C.2.

- There was disagreement among permittees regarding how forceful permit language should be around providing messages in languages other than English. While some appreciated the flexibility that the word "shall," allows, others felt that the language should be changed to "must," to help staff better communicate with management about the need to do this work. Regardless of the language used, permittees agreed that translation is not sufficient. Instead, the focus needs to be on transcreation i.e., not simply providing audiences with translations of

English outreach materials, but providing them with translated AND culturally relevant outreach materials.

Section S.5.C.2.a.ii: Behavior Change

- Consider creating a visual guidance tool for the timeline, like a table or flowchart, including social marketing steps, to help permittees better understand how to stay on track to meet requirements over the course of the permit cycle.

Overburdened Communities

Section S.5.C.2.a.i: General Awareness

- Permittees request more guidance on what audiences qualify as “overburdened” and how to identify them.

The following is a summary of items described above that would be helpful to include in future guidance documents:

- What is meant by “local” water quality data.
- What qualifies as regional collaboration.
- More examples of different kinds of activities that would qualify as “stewardship.”
- Clarification on the stewardship requirement and what is intended by the statement “areas serviced by the MS4.”
- More information on what program evaluation entails. Guidance for this section should also include more information about what it means to “affect” behavior change.
- A visual guidance document for the behavior change timeline.
- What audiences qualify as “overburdened” and how to identify them.

Appendix I

Consolidated Comments from E&O Ad Hoc Survey and Google Slide Meeting Notes

E&O Intro Section: S5.C.2

Local WA to regional

- What kind of local water quality info is appropriate? Proposed solution: Direction on appropriate water quality info. **(Phase II)**
- Instead of "local water quality" it should say "local and/or regional water quality" or better define what is meant by "local". Proposed solution: "Local" implies within our jurisdiction. But water quality information may be part of a study covering a large area, like the impacts of road runoff. **(Phase II)**
- "Create" stewardship opportunities, "local" water quality data. Change "create" to "promote" and change local water quality data to regional water quality data. Justification: We are a small jurisdiction and do not have a large capacity to create stewardship opportunities. Further in the permit it says create or promote opportunities in your community, which is better language. There are so many partners to utilize that are well experienced in stewardship opportunities and volunteer management. **(Phase II)**
- Under minimum performance measures, language includes using "local water quality." This is problematic for smaller jurisdictions who may not have access to local data. We suggest changing from "local" water quality to "regional" water quality. **(Phase I)**
- We appreciate the language in this section which is broad enough for interpretation by smaller jurisdictions. Adding language that is too specific and prescriptive makes it difficult for small jurisdictions to comply. **(Phase I)**
- "Local" water quality data limits jurisdictions to the data that they collect, which may not be much/give a full picture. Change to local and/or regional water quality. Justification: Gives a fuller picture of water quality/water quality issues to better inform outreach programs. We pay into SAM and, as a result, are limited in the amount of local data available. **(Phase II)**
- It would be more appropriate to convey this as something along the lines of "relevant or applicable water quality data related to pollutants conveyed from MS4 discharges."
- No resources for mgmt commitment to identify WQ issues - challenging to do this level of work, challenge is only one staff - doing door to door engagement
- Findings from SMAP-related analyses can also be a local source to help inform local E&O-related priorities.
- Instead of "local" water quality data, use "Regional" as some jurisdictions don't have hyper-localized data to pull from. Maintain regional language. "Local water quality" is very ambiguous, what are the data requirements? Define what qualifies. How does one incorporate local data?
- Suggest changing language from "local" water data to allow/include "regional" water quality data. Not everyone has access to data.
- "The program design shall be based on local water quality information." Needs to be more elaborate or explicit as this language doesn't give enough guidance; however, having some

flexibility is positive. Proposed solution: Provide guidance on how jurisdictions could use local water quality and/or illicit discharge information to help prioritize efforts.

- Changing water quality language seems to be a reoccurring theme; may be more appropriate to convey this as something along the lines of “relevant” or “applicable water quality data related to pollutants conveyed from MS4 discharges.”
- What is the local water quality basis that Ecology is looking for? And how must that be considered when jurisdictions work on a regionally collaborative basis? Is the local WQ established by the jurisdiction? Ecology? A third party? What if not all jurisdictions have done the same types of WQ analysis across the regional group? What determines the priority of one water quality issue in comparison to another? **(Phase I)**

Regional Collaboration

- We are subject to secondary permit (S6.E). However, I agree that allowing for regional approach and collaboration is a positive - stormwater and BMPs make sense in watersheds that cross city and county boundaries. **(Secondary Permit)**
- I would love to define regional collaboration, and to encourage that more in our region. **(Phase II)**
- There is a lack of recognition of the global impact of climate change on our work, communities and the role of stormwater or investment - what is the overall community engagement goal of Ecology’s work? How can we use the power of these dedicated folks to address environmental outcomes we hope to see? Are we missing the big issue by focusing on local details, not having an overall shared goal? E.g., strategic messaging focus: climate change - human environmental health- economic health -role of stormwater WQ and infrastructure. We could have a reqt for other skill sets: social scientists, urban planners, economists to pull the big picture together - and allow individual stormwater managers to feel successful and that they are contributing.
- placing education on stormwater managers risks may not be the best approach for ed - we need to call out that skill set - rather than assuming anyone can be an educator. We risk traumatizing or turning off students, esp. those from underserved communities.
- Don’t recommend making the above suggestion in the white paper. This would require small jurisdictions to have to contract out for specialized skill sets without resources to do so.
- Kudos to Ecology to see the effectiveness of regional collaboration. Water quality issues are not confined within the boundaries of a jurisdiction. And residents and businesses rely on information from sources across the region, not just from those within the confines of the jurisdiction. Significant impact is made through well-done regional collaboration. Regional collaboration is amazingly effective. Continue to require that local implementation is done when involved in a regional collaborative program/campaign. **(Phase I)**

Stewardship

- “Create” local stewardship opportunities limits stewardship options. Change to “promote” stewardship opportunities. Promoting stewardship opportunities allows us to take advantage of partner efforts as well as leverage resources and avoid duplication of efforts **(Phase II)**
- Regional collaboration does not currently include Stewardship. Solution: Insert stewardship in paragraph 2 after behavior change. Justification: Community engagement efforts can cross jurisdictional boundaries and should be recognized by the permit. **(Phase II)**

- Regional collaboration helps leverage resources and avoid duplication of efforts.
- Under 11, there are three bullet points of what is included in an education and outreach program. In the paragraph below that, it mentions that regional collaboration can be used to only meet the first two bullets. We propose including stewardship as a regional collaboration opportunity. Would increase partnership opportunities. Remove the 3rd bullet point. There is a section requiring stewardship requirements already. It makes it confusing as to what can be included as E&O verse stewardship opportunities. **(Phase II)**
- I don't feel like the about part of this statement encompasses the purpose of this work. Maybe... about practices to prevent stormwater pollution and reduce stormwater runoff
- Stewardship - Promote sense of place and connection to the local watershed through community stewardship opportunities
- "Promote" rather than create stewardship opportunities. Allows for working with partners. Provide a nudge towards equity and justice.
- This should include language such as create stewardship opportunities that promote sense of place and connection to the local watershed.
- We propose including stewardship as a regional collaboration opportunity as it would increase partnership opportunities. **(Phase II)**

Permit Language-stronger

- Words like "should" and "shall" are ambiguous. Remove words like "should" and "shall" because they don't provide real direction to the Permittees. Replace with "must" and "will." Justification: Permittees need clear directions to adequately meet permit requirements. Telling us we "should" do something will likely get a different result than telling us we "must" do something. **(Phase II)**
- Disagree with reducing the flexibility of the permit language. I don't think permittees need clearer directions as long as they are making a good faith effort to build general awareness, effect behavior change, and promote stewardship. I like the flexibility to coordinate with other jurisdictions on topics. **(Phase II)**
- Language needs to be stronger to ensure equitable access to E&O materials and programs. Proposed solution: Highlight overburdened communities and equity. **(Phase I)**
- Remove "consider" change to The Permittee shall deliver its selected messages in languages other than English as appropriate to the demographics within the jurisdiction. Current language doesn't align with Title VI
- Appropriate to the demographics and audience within the jurisdiction
- "Shall consider delivering selected message in languages other than English" is way too lenient. Smaller jurisdictions especially are actively ignoring underserved communities that speak other languages. Leadership/management at these organizations need an explicit directive to translate/communicate in other languages, otherwise it will continue to be ignored. it's too easy as written for jurisdictions to choose awareness campaigns/behavior change campaigns that don't impact some of the most critical problems. Is dog poop really the most important pollutant? Or is it just the one with the most examples to follow? Remove the word "consider." If translation is not appropriate for the target audience, removing the word consider still allows them to not do it. But if it's appropriate, don't just consider it. Do it. **(Phase II)**

- Smaller jurisdictions, especially outside of the Puget Sound general area, do not have resources to develop these materials (transcreated materials in other languages)
- Remove “consider,” replace with shall
- If required to set aside budget or FTE for this task it might get somewhere - if there were coordination outside small
- Disagree with above statement, the flexibility allows small jurisdictions to tailor to community, and larger or more resourced jurisdictions to have multiple education programs. **(Phase II)**
- Jurisdictions that focused on behavior/audiences - e.g., haz waste mitigation would be helpful
- Language needs to be stronger to ensure equitable access to E&O materials and programs
- Add comment about sense of place and connection to the watershed, local waterways, aquatic habitats and wildlife and Puget Sound/Salish Sea **(Phase II)**
- “General awareness” is weak and I don’t feel that will elicit change. There needs to be a hook, something meaningful to make people care and want to change. This involves researching the demographic.
- Add wording of “social science” to help further define what behavior change means. Think “behavior change” program needs to be better and more specifically defined.
- Suggest not using acronyms (MS4) as folks may not have read previous sections in which the acronym is defined. **(Phase II)**
- “Based on the target audience’s demographic, the Permittee shall consider delivering its selected messages in language(s) other than English, as appropriate to the target audience.” I’m curious if this section could be reworded to actually get at what is intended. Just translation does not always support actual behavior change. How else could this be targeted?
- Many comments are “smaller jurisdictions” and I think I have mentioned this before, but when you do formalize could we use a term like resource limited or something similar? Sammamish is no longer considered a “small” city by size, our population has gone from 35K to 70K while I am still the only one doing NPDES. So population has grown resources have not. Hope that makes sense. **(Phase II)**
- Suggest seeking an alternative descriptor as the phrase “behavior change campaign” in association with government programs has raised eyebrows from of our citizen advisory committee (as well as some staff) as, for some, it connotes government engaging in social engineering. Different terminology may help prevent conspiracy-type thoughts around the intent from emerging. **(Phase I)**
- Under I.c., use the same wording as used under 11.a regarding delivering selected messages in language(s) other than English, as appropriate for the target audience. **(Phase II)**
-

Target Audience

- I see an issue with the language "area served by the MS4." This is limiting language that suggests programs focus on areas only served by the MS4 rather than areas of greatest need as it relates to water quality issues, which could include issues relates to TMDLs or private systems. I suggest language that states, "area within permittee's jurisdiction." More inclusive to allow addressing areas not served by MS4. **(Phase II)**

- Disagree with above statement, permittees have no control over this and cannot enforce this much with limited resources. There are separate sections for addressing private runoff and TMDLs, should not be included in E&O. **(Phase II)**
- Sometimes it's difficult to find out information about target audiences and demographics are the least of it- psychographics is more important **(non-profit partner)**
- change "high priority target audiences" to "high priority audiences" and "target audience" to "priority audience. I think it clarifies that we choose our audiences based on prioritizing goals, not just on targeting certain groups. **(Phase II)**
- Substitute the word "target" for priority throughout E&O section
- Use of the language "target audience" within the entire permit can be problematic because it can be perceived as offensive. We suggest changing the language throughout the entire permit from "target audience" to "priority audience." This is language that is being adopted within the social marketing community of practice. **(Phase I)**
- Trying to figure out how to reach industrial, commercial audiences - ad costs high, what is mechanism to reach audiences
- Change language from "target audience" to "focus audience" or other similar wording avoiding the word "target" throughout permit.
- Ensure targeting underserved or underrepresented communities
- Languages other than English - translation may not be enough. Need to consider cultures - transcreation.
- Some kind of language that encourages an equity and environmental justice lens be applied to audience identification and focus (targeting language may be problematic)
- Add workforce as target audience. As a group are least vested, less recognized, do activities that have potential impact and more transient in community where they work. Also, this target audience may be more marginalized than residents in some communities.
- How is one target audience to be prioritized over another, especially if there are numerous distinctive overburdened communities within a jurisdiction (language based, income based, physical ability based, mental capacity based)? How is this to be documented and decided upon? And with limited jurisdictional capacities and resources? **(Phase I)**
- I would also like to see clarification about "based on the target audience's demographic." Is there a certain threshold we should consider - a percentage of people in the target audience that are not native English speakers - that would trigger providing translation services? **(Phase II)**
- "Overburdened communities" is not a well defined or common term and Ecology doesn't seem to have a consistent response as to what it means. **(Phase II)**

Staff Capacity

- Trying to do a campaign on co-mingling hazardous waste - by herself it is difficult
- Run NPDES Pro - has the contacts, but stuck on how to create educational campaign for audiences - training would be good
- Define the following requirements especially for small jurisdictions to get management to support this program with dedicated resources.

- **Expertise** required to plan and implement behavior changes, and how many FTE to achieve collaboration and outcomes as needed. What skills, knowledge and abilities need to be on the team for this? Most compliance specialists are not behavior change specialists, and expecting an expert of both in one person is a big ask. **(Phase II)**
- Most small jurisdictions are existing with just one or maybe two staff members, and they do not have the resources to do any of these things well, even if they collaborate with other jurisdictions. Is there a way Ecology can "encourage" leadership to grow its staff? NPDES is designed to get harder and harder, to slowly develop stronger programs. Leadership seems to believe it's static and they'll never have to grow. We can't do more if we don't have more to do it with. **(Phase I)**
- E&O is a huge effort for small jurisdictions, I would love to see more regional efforts and hopefully will with full time STORM coordinator. It is easier for us to buy into programs. I don't think the behavior change program is effective, don't have the resources to target the big players **(Phase II)**
-

General Awareness: S5.C.2.a.i.

Target Audience

- I think it's interesting that this remained in the Permit after research demonstrates that awareness doesn't lead to changed behaviors (and wasn't that the basis to add the behavior change element?).
- Add back the language for a minimum of one target audience and one subject area. **(Phase II)**
- Stormwater facility owners and maintenance providers are not mentioned as a target area, and facility maintenance is not listed as a subject area. People who own stormwater facilities often haven't a clue that they even need maintenance, let alone how to maintain it. "(b) Target audiences: Engineers, contractors, developers, land use planners, property owners, and maintenance providers." And add "stormwater facility maintenance" or something similar to the subject list. There needs to be more emphasis on how to maintain systems, otherwise they're just built and will fail prematurely due to poor maintenance. **(Phase I)**
- The number of people experiencing homelessness and associated homeless encampments are increasing. Often these encampments are nearby stormwater ditches, or sensitive water bodies. Very few encampments have access to hygiene stations or waste disposal facilities resulting in a large buildup of litter, debris and pollution from hazardous waste including human waste that are subject to entering our local water ways as stormwater runoff. Unhoused individuals or people experiencing homelessness should be added as a general awareness target audience Add "people experiencing homelessness" to the general awareness audience list. **(Phase I)**
- Is there an opportunity to include internally focused education to jurisdictional staff to raise understanding of why we should care about water quality and create a culture that prioritizes actions and policies that promote the protection of surface waters.
- I'm wondering if there's a way, we can get away from saying "general public" ever here. Here maybe we just say "residents" instead, since this list also calls out businesses? And include some other examples in the "including" section. I think the term "general public" is the opposite of a target audience, AND it implies that things that are created for "everyone" are

able to equitably reach a huge variety of groups of people when what actually happens is certain groups are being served (often white, middle-class, English-speaking, etc.) and other groups are not. These issues may be recognized by some of us doing this work, but maybe less so in jurisdictions that do not have people with education and outreach training who are doing this work. I have at times struggled with getting engineers, managers and supervisors to clarify who they are trying to reach while they insist it's for "everyone." **(Phase II)**

- Target audiences in (a) is unclear, confusing as written. Proposed solution: Possibly remove "including" and change to "for example," format more like target audiences in behavior change section **(phase II)**
- Define overburdened communities somewhere in permit, possibly glossary. Section needs clarity.
- Some specific audiences are left out such as real estate professionals (important for ensuring transfer of proper LID awareness, functionality and maintenance). some specific audiences are left out such as real estate professionals (important for ensuring transfer of proper LID awareness, functionality and maintenance). add real estate professionals as another audience. **(non-profit partner)**
- There is no such thing as the general public- all audiences are segmented. On what basis is Ecology determining that kids and businesses are priority audiences? What research? **(non-profit partner)**
- Add references to human health and remove the language about "general audiences." The audiences should be left blank because jurisdictions will have a much better idea of whom to focus on as it's pretty area specific. Also, to bring together land use planners with stormwater professionals is an emerging area of the American Planning Association's Water and Land network. **(non-profit partner)**
- Very shoehorned in the target audiences, are we able to select a subset of these populations? Create a category that allows jurisdiction to select audience and topic that's identified in their jurisdiction, similar to how the BMPs have that option. We have some specific target audiences (wineries) not relevant to other jurisdictions **(Phase II)**
- Stormwater facility owners and maintenance providers are not mentioned as a target area, and facility maintenance is not listed as a subject area. People who own stormwater facilities often haven't a clue that they even need maintenance, let alone how to maintain it."(b) Target audiences: Engineers, contractors, developers, land use planners, property owners, and maintenance providers." And add "stormwater facility maintenance" or something similar to the subject list. There needs to be more emphasis on how to maintain systems, otherwise they're just built and will fail prematurely due to poor maintenance. **(Phase I)**
- Perhaps target audiences are identified by the findings and priorities emerging out of their SMAP effort.
- What about people living in apts and condos with no or little land? You would need to focus on property managers and owners who are notoriously uninformed about these issues. HOAs need to be specifically called out. What is written is incomplete- also in behavior change, there is movement to stop using the term "target," and replace with "priority" audience. **(non-profit partner)**

Overburdened Communities

- Better direction on overburdened communities for jurisdiction's that have small percentage of these communities. Proposed solution: Recommendations for jurisdictions with small percentages of overburdened communities. Acknowledge us of graphics focused outreach S5.C.2.a. Outreach to include signage include the function of City owned facilities **(Phase II)**
- Need clarity on "overburdened communities".
- Include stronger language to ensure outreach to overburdened communities
- There is inconsistent language between Phase I and Phase II permit under subject area (a). In parentheses, it says "including school age children OR overburdened communities". Is this intentional? There are questions about what is meant in (c) about an ongoing or strategic schedule, particularly about what is considered complying with the permit. Better define the expectations. Under section (b), "technical standards for stormwater site and erosion control plans" is confusing. What does general awareness mean for this? **(Phase I)**
- Overburdened communities" is very broad, needing guidance on how broad or focused the "targeting" is to be. There are few clear methods for identifying overburdened communities and no guidelines on how to balance engaging them versus the general public – all served by the MS4. **(Phase I)**
-

Multilingual outreach

- Under i.c., use the same wording as used under 11.a regarding delivering selected messages in language(s) other than English, as appropriate for the target audience. Match the wording from 11. alt will solidify the idea of including language other than English into outreach materials. **(Phase II)**

Other

- LID is a challenge for Cities like Orting where infiltration is not conducive due to our extremely high-water table. Yet everyone building on a lot in Orting must first try to use LID for storm drainage impacts even though we already know it won't work due to the high-water table. It's a waste of money for those seeking to build in Orting. Could something be added like; If you can show in a 300-yard radius that LID is not an option the requirement to use LID principals may be waived. Doing all the geo work, design work and Engineering to show that LID principals don't work in 90% of the Orting Valley (something we already know) waste everyone's time and money. Using a consultant engineering to review the individual storm analysis for every lot to be built on in the city limits cost the city money. Why go through all that time, effort and dollars when we already know it won't work in our area? Can we get back some common sense?
- It's not clear whether both a) and b) are required, or one or the other. If points a) and b) are both required, the section should include "permittees must target each of the following audiences and subject area." **(Phase II)**
- Home-based and mobile businesses need clarification. Which home businesses are included? Are mobile businesses only those which have a business license in your city? What if they are not based in your city, but they come to your city to do business? **(Phase II)**
- This seems to pertain mostly to urban/suburban regions. Allow more flexibility to local government to target areas of concern, and therefore audiences, based on land uses associated with potential pollution in their regions. Or allow local government to target streams and

waterways that need protection and work back from there to the areas that impact these waters to define targeted education. **(2ndary permittee)**

- General awareness should include efforts to inform audiences about resources that are impacted by stormwater. Its hard to discuss the impacts of stormwater without providing the context first such as the current state of Puget Sound and local waterways or without the inclusion of beneficial uses & ecosystem services which are key components of the Clean Water Act and why most people care about water quality
 - o Response to the above statement from another jurisdiction: perhaps findings and priorities identified through SMAP efforts can inform this
- In order for Phase 1 & 2 Permittees to most effectively collaborate regionally on this, the language between the Permits needs to be EXACT. In the 2019-2024 Permit, there are distinctive differences created in switching out the “and” of the Phase-1 Permit with the “or” of the Phase-2 Permit. Phase-1 Permittees, therefore, need to have a regional program satisfy ALL aspects of the General Awareness section, and Phase-2 Permittees only need to satisfy a portion of what Phase-1 Permittees are required to do. This makes regional work tricky to ensure that the collaborative regional effort, which is more than what Phase-2’s need, fully satisfies the needs of the Phase-1’s. It is greatly appreciated that Ecology has given the nod and understands the value of regional work. Help us to accomplish it most efficiently by having the language the same so that we are all working on the exact same goals. Effective and efficient use of local resources (time, \$, capacity) at the local jurisdiction and regional level. We all want to actively work toward the same goal. Give us the same and clearly marked bulls-eye, not slight differences between them. **(Phase I)**
-
-

Behavior Change: S5.C.2.a.ii.

What happens after 2023 and long-term sustainability?

- We want to make sure that the language in the new permit is sustainable, clear and encourages long-term efforts rather than chasing the shiny new thing.
- In the next permit, we shouldn't need to redo this whole process. Once we have a strategy, it is built into the permit that we adapt the program. Proposed solution: Continue to implement the program and adapt it to make it more effective. We shouldn't always create new behavior change programs. If we know what works, then we can implement and adapt as needed.
- If our behavior change campaign has ongoing monitoring integrated within the program and/or a final evaluation has been performed, we should not have to do a new effectiveness evaluation at the beginning of the NEXT permit if we can provide evidence of this evaluation. The language does not include support for long-term programs. **(phase II)**
- Allow for ongoing program evaluation rather than a new evaluation at the start of the next permit. Proposed solution: Include clearer language that allows for the ongoing work toward an existing behavior change program in the next permit.
- No issue with the language. I'd like to see Ecology make permittees prove they did some of the steps involved in social marketing. I'm concerned that some jurisdictions are just skating along, doing the absolute minimum or less due to understaffing. At least one organization has just

copied what someone else did with no pilot testing or research about whether it even worked the first time. **(Phase I)**

- S5. C.2.ii.(c) and (d) should be removed in the next permit since the program is evaluated and we will continue to direct effective methods and implementation of the ongoing behavior change program.
- Permittees should not be required to conduct a new evaluation of the effectiveness of an ongoing behavior change program because this evaluation including lessons learned is required at the end of the current permit cycle (S5,C2.ii (e) - No later than March 31, 2024, evaluate and report on: 1. The changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy; and 2. Any planned or recommended changes to the campaign in order to be more effective; describe the strategies and process to achieve the results (f) Permittees shall use results of the evaluation to continue to direct effective methods and implementation of the ongoing behavior change program).
- Some questions about how the behavior change campaign language will be modified. Want to make sure that it is sustainable and that it allows for jurisdictions to seek long-term changes.
- Do not require follow up evaluation of S5.C.11.a.iii. for an ongoing program. Rather, let the evaluation be incorporated into the next Permit cycle's work. Otherwise there is simply a lot of evaluation immediately after an evaluation. Allow us the time to refine, reach out to other MS4 jurisdictions for regional collaboration, strategize, implement and evaluate within the next Permit cycle.
-

Sustainability for Smaller Jurisdictions and/or Those without Social Marketing Experience

- This is a VERY difficult (impossible?) requirement for a small jurisdiction on their own. Give resources along with permit and remind permittees that they can collaborate to meet this requirement.
- Just a note here - a lot of smaller jurisdictions do not have an education and outreach dedicated person, so learning about social marketing is already a huge lift. How can this section be re-written to be inclusive of smaller jurisdictions with limited time and resources?
- CBSM training and education courses aren't cheap and cost prohibitive for smaller jurisdictions
- We will have 60 more source control with new requirements - so staff does not include and one NPDES staff is now doing 8 requirements - especially when you are not the tech expert in some to the requirements
- Missing a requirement for staff, funding, FTE
- We did dumpster outreach and may switch to adopt a drain (because it is prepackaged)
- For smaller jurisdictions banding together with a regional group is the only practical way to get this done
- Overall concern about the time that is required to actually do social marketing correctly. Many small jurisdictions don't have the time/resources to do this well. Provide more guidance about what types of programs are okay and how smaller jurisdictions can partner with agencies outside to meet this requirement. Proposed solution: Clarify expectations between 2021 and 2024 **(Phase I)**
- Define the following requirements especially for small jurisdictions to get management to support this program with dedicated resources. **(Phase II)**

- **Expertise** required to plan and implement behavior changes, and how many FTE to achieve collaboration and outcomes as needed. What skills, knowledge and abilities need to be on the team for this? Most compliance specialists are not behavior change specialists, and expecting an expert of both in one person is a big ask.
- **Evaluating** the planning stage; what behavior change strategy has potential buy in from target audience and what strategy has impact. How to evaluate this; professional survey, analysis from data set (what data sets).
- **Methods** to implement defined. Will this be google ad campaign, door to door with focus points, or curriculum for STEM teachers for example. Will this include target audience symposium that is facilitated by government or some other expert? Examples of costs of various methods would be helpful. Research based examples of promising behavior change based on scope (population, setting, etc) for most impact would be helpful. A symposium of methods with lessons learned and grant funding could be helpful. Should behavior change strategy have a minimum population (1,000 -10,000 people) to be effective, thus requiring jurisdiction collaboration? If a campaign focuses on specific marginalized groups, would cross-sector collaboration be necessary and require interagency agreements?
- **Evaluation and analysis plan.** Data collection on implementation and long term results. What data points will be collected at time of delivery of campaign, and what data will be collected as follow up for sustained measurement? How will that data be interpreted for meaningful analysis?
- **Intra-jurisdictional agreement:** requirements to formalize collaboration.
- **Next steps – lessons learned:** Adapting behavior change marketing based on success or lack of progress.

Measuring behavior change

- Language about measuring the "understanding of a behavior change" does not serve anyone. We are required to measure the understanding of a behavior change but understanding may not have any bearing on people's willingness to adopt a behavior. Therefore, it would be more meaningful for permittees to measure actual behavior change and/or intention to change behavior. **(Phase I)**
- Changing people's behavior can be a challenge educating them is not. How can you accurately determine if you've changed someone's behavior? I don't live with them I don't monitor what they do on their private property. How about revising the language Enlighten through educational information in lieu of behavior change program? How about some examples of "lessons learned."? See question 12. I personally I don't like the term "Behavior Change Program (behavior Modification Program)," it implies everyone is doing something wrong. I prefer educating the public of the negative impacts pollution has on our waterways rather than changing their behavior. If the audience understands the negative impacts they'll change on rather on their own. **(Phase II)**
- Also under iii, clearer language would be helpful regarding forgoing an evaluation. Mention it will be evaluated later, but not in July? And should it be evaluated before March of 2024.

- We are required to measure the understanding of a behavior change but understanding may not have any bearing on people's willingness to adopt a behavior. Therefore, it would be more meaningful for permittees to measure actual behavior change and/or intention to change behavior.
- Hard to measure the uptick in these programs - e.g., adopt a drain - not clear how to collect that data
- Behavior change is a long-haul vs spill response
- Add language and specificity for what a program evaluation should look like
- Behavior change/social marketing steps do not necessarily include education to achieve the behavior change; therefore, reporting on changes in understanding may not always be applicable.
-

Timeline

- The timeline is very heavily frontloaded but there is a big gap between v and vi. What is expected from jurisdictions for reporting between v and vi? What happens if a project isn't going well, and an agency wants to change? Would prefer some language that provides more guidance to jurisdictions about what is expected between 2021-2024 **(Phase I)**
- The word "implement by" is vague and could be better defined. Allow for opportunity to continue and refine current behavior change program (if relevant) Proposed solution: Define what is meant by "implement" Carry forward language from s5.C.2.(c).1 Our jurisdiction has put a significant amount of work into our current behavior change program and would like to continue it into the next permit cycle. **(Phase II)**
- Timeline seems a bit arbitrary. Lots of deadlines in the first couple of years, then a 3-year gap. - When should vii happen - during this permit cycle or the next permit? Perhaps jurisdictions could develop a timeline for their program and submit as part of report early in permit cycle, that meets the required benchmarks. Add clarity to timeline. Clarity needed around timeline to make sure we're in compliance. **(Phase II)**
- Timeline is too condensed. Should allow more time for issue and audience research, program conceptualization and tool development and pilot testing up front before implementation phase.
- I wonder if it's worth calling out the suggestion to pilot programs or do mid-program evaluations? Probably too much detail for this, but maybe worth discussing. It's not a great practice to run a program the same way for 4 years and only evaluate it at the end. **(Phase II)**
- Add language to include what will be expected in the annual report.
- Timeline wound up being heavily front-loaded in terms of work.
- Timeline language needs to be more clear
- Include option to switch behavior change topic/audience within current permit cycle if it is found too ineffective or too challenging to implement for the jurisdiction. For example, if the jurisdiction opted for the regional campaign give them the option to leave that campaign and focus on their own.
- Between bullet D & E, leaves a lot of ambiguity and would like to see more benchmarks on what is expected and what those timelines are

- Ecology needs to request documentation for each milestone. Example “July 1st, 2020, conduct evaluation”, but ecology never asks for proof.
- The overall work identified and outlined in this section is the right course to take, yet there is insufficient time between “developing” the strategy (S5.C.11.a.iv – Phase 1) and “begin to implement” (S5.C.11.v. – Phase-1) which is insufficient if partners and/or consultants need to be brought on board and contracts need to be negotiated and executed. Retain the general outline of work to be done. Keep the language exact between Phase-1 and Phase-2 Permittees – which allows them to focus and to develop regionally collaborative campaigns. Remove S5.C.11.a.iii. Provide a minimum of 9-months between the milestone date in S5.C.11.a.iv. and S5.C.11.a.v. Efficient use of local resources. Allows for effective collaboration between Phase-1 and Phase-2 Permittees. Allows sufficient time to do effective work within each sub-section of the behavior change campaign. **(Phase I)**

Use of the term CBSM vs. social marketing

- Concerns about the language of "community based social marketing." CBSM is not the same as social marketing and yet social marketing is what most jurisdictions really are doing and is also more feasible. CBSM should not be used as the "catch all" phrase. **(Phase I)**
- Change the language from CBSM to "social marketing" throughout the permit. CBSM should not be the umbrella term. Also, CBSM vs social marketing are two different things, and many jurisdictions don't know the difference.
- "Community-based" social marketing is too specific. This language feels like it is promoting Doug Mackenzie-Moor instead of encouraging jurisdictions to choose the social marketing methods most applicable to their target audience and subject. Our local social marketing expert, Nancy Lee, does not include "community-based" in her 10 planning steps. **(Phase II)**
- Consider broadening to social science. Not necessary to limit to community-based social marketing
- Seems overly complex but understand that it is providing options to address requirements so that's good. **(2ndary permittee)**
- Community Based Social Marketing should not be used as the “catch all” phrase for behavior change programs. Most of what local jurisdictions are doing would qualify as social marketing but is NOT CBSM.
- Change community-based social marketing back to social marketing, it represents more global approach.
- Community based language could be reworded to a better fit. Change language to social marketing **(Phase II)**

LID

- It is unclear what is expected for behavior "LID principles and LID BMPs".

Target Audience and/or BMP List

- Perhaps findings and priorities identified through SMAP efforts can inform this.
- Add commuters to target audience

- Suggest adding commuters as a target audience. We have lots of people driving to or through our city who don't live here, but whose vehicles impact our water quality. Some jurisdictions plan to use Adopt-A-Drain as their behavior change program. If this is allowed, suggest specifically adding it to BMP list. Commuters are an important target audience we're missing. **(Phase II)**
- Under ii.a mention under target audiences is based on target audience's demographics and can include overburdened communities. Would help make it easier to follow and understand. Solidify inclusiveness. It is confusing as written.
- Tiny jurisdiction - no schools, few industrial, other businesses - that limits the options **(Phase II)**
- BMP list not complete. Include pressure washing and BMPs to address 6 PPD Quinone if possible.
- The city likes residents as audience - biz don't vote, but they do bring in \$ in light industrial category - there is a small residential area, large biz/industrial area - no mechanism for outreach
- Consider adding Adopt a Drain to BMP
- 5: More options or emphasis on rural issues
- Language allows jurisdiction to choose audience and subject, very valuable. Flexibility allows us to address local issues. We encourage ecology to keep.
- 5: First part is clear with audience and BMP, and last line allows for rural options (focus otherwise seems more urban).
- Target audience language could be wider. For example, broaden school age youth to include college students. Or young adults - interns and youth bound for employment paths.
- I would like to see LID assessment and maintenance activities as another BMP behavior change. WSU and Stewardship Partners, with funding from SAM, created a rain garden/bioretenion assessment protocol that has now been made into an app: <https://extension.wsu.edu/raingarden/monitoring-rain-gardens/> Creating a new cadre of drain rangers who monitor and maintain rain gardens, bioretention and other LID BMPs could make a big difference in supporting effective stormwater management and pollution reduction to receiving waters. The assessment protocol and app provide a good starting place for such a program. Stewardship Partners is further developing the tool to enhance maintenance guidance when assessment identifies a failure. Bioretention is only useful if the inflow isn't clogged, and stormwater is actually entering the facility. **(non-profit partner)**
- I appreciate the lists of examples for target audiences and topics, allowing jurisdictions to choose what is most meaningful and important to them. **(Phase II)**
-

Regional Collaboration

- The large number of BMPs available for selection result in a scattered effort at behavior change that is ultimately ineffective for combating pollutants of primary concern. The general awareness efforts should cover many topics for causes and prevention of stormwater pollution, but it would be far more effective if jurisdictions joined forces and focused on one, data driven BMP for behavior change. For example, instead of one jurisdiction focusing on dumpster lids and another on pet waste, require the region to join all its efforts on a known and complex issue such as 6-PPPD Q. It has been shown to be a cause of salmon mortality. The primary cause is from tire ware particles. Having the region of Permittees focus all of their efforts on getting cars

off the road, engaging with tire manufactures and educating the public on the subject would be far more impactful in potentially making difference that will benefit water quality. Streamline the list of BMPs to focus efforts on behavior change that could have a greater impact. Spreading the focus of Permittees across so many BMPs is ineffective. If we worked together to tackle one known pollutant of concern, we might actually make a difference in improving water quality.

(Phase I)

- Just feel that determination of behavior change is really tough. Smaller organizations don't have resources to do the social marketing aspect, thank goodness for the ability to participate in a regional campaign. Proposed solution: Remove the behavior change effectiveness survey. you can put information and opportunities out there, but lack of participation of surveys, evaluations, doesn't make it easy to determine if the efforts were effective or not. Just think a comprehensive mix or rotation of target audiences selected per year would suffice. **(Phase II)**
- To "effect" behavior change - are you out of compliance if behavior change campaign is unsuccessful? I just don't find this requirement to be effective with the limited resources we have. The list of BMPs for behavior change is too extensive. Spreading efforts across so many topics is ineffective. It would be more beneficial to have a known data driven regional water quality issue focused on as a regional group. This would also benefit smaller jurisdictions that have limited E&O resources if there was one unified behavior change effort. Kind of dead in the water with the dumpster group not receiving GROSS funds and management pushback on adopt a drain. **(Phase II)**
- Expand language to include those permittees can participate in regional CBSM or social marketing campaigns
- Organized, collaboration across the west side would make it easier for everyone to access materials. Would be nice to see this represented in the permit. Ex: provide a public repository where people can share resources.

Permit language/formatting

- Suggest seeking an alternative descriptor as the phrase "behavior change campaign" in association with government programs has raised eyebrows from of our citizen advisory committee (as well as some staff) as, for some, it connotes government engaging in social engineering. Different terminology may help prevent conspiracy-type thoughts around the intent from emerging.
- Suggest changing "behavior change" behavior adoption.
- Replace "shall."
- There are long strings of letters/numbers referring to different areas in the permit. This makes it difficult to follow. Also, under ii.a under target audiences, it would be helpful to match wording regarding target audiences for general awareness **(Phase II)**
- Disagree with above statement that this makes it difficult to follow, helps keep the permit organized and can reference specific sections by these. **(Phase II)**
- After each string of letters/numbers, include a heading in parentheses immediately after to help identify the section of the permit
- What does implementation mean?
- Consider labeling sections with words instead of numbers
- What do we need to include in our annual report?

- 5: Section is overly complicated - a flow chart, table, timeline and/or fact sheets on how to implement may make this clearer.
- Would 3.(d) include research?
- 5: Last line (results): not clear when 'f' is due (and how it fits in 5-year cycle).
- S5.C.11.a.vii. – Permittees “shall use results” . . . of the “ongoing behavior change program”. Is this a program or a campaign? The overall Education & Outreach program is defined earlier as “ongoing” yet the behavior change CAMPAIGN has not been set as “ongoing.” What determines “ongoing”? What if the results of the evaluation shows that it is best to switch to a different BMP campaign, or local water quality issues arise that shifts the focus to a different BMP, or that larger forces intervene to necessitate a shift? How does “ongoing” get defined and/or shifted? What is a regional collaborative effort emerges that is more effective than what the lone jurisdiction set out to do, does the behavior change campaign need to be ongoing in order to comply with the Permit? Incorporate the language of S5.C.11.vii. into S5.C.11.vi. with the caveat that the jurisdiction may opt to not continue that BMP behavior change campaign in a future Permit. Stick to the word “campaign” for the individual BMP-related being done within S5.C.11. a.i-vii, and to the word “program” for the overall work being done within S5.C.11. **(Phase I)**
- Require a sharing out of the results so that we all can learn and benefit and not re-create the wheel. – allow time to share out and respond to if needed in advance of the next Permit. Allows flexibility for the need to change focus (topic, audience, water quality issue) by the jurisdiction into the future. Allows time to apply for, be awarded and negotiate grant-funding to accomplish the work as a regional collaboration. The rigor of this section allows for behavior change to be identified and improved across the region. **(Phase I)**

Other .

- Add language to clarify when/how partnering with other agencies meets the requirements.
- Add Hamline's "Adopt-A-Drain" program as a stewardship option. **(Phase II)**
- When we are rapidly developing - trying to put adopt a drain into action is not taken seriously
- Use health in all policies similar to public health - create a health in all environment - embedded in policy would help - we are competing economic development and other things. Lack of urban planners

Stewardship: S5.C.3.a.iii

COVID Concerns (updated language for virtual engagement)

- This requirement has become more difficult to meet due to COVID. Volunteers are reluctant and it's more difficult to ensure that protocols are being followed. **(Phase I)**
- Add mention of virtual engagement.
- Recent restrictions related to the worldwide pandemic greatly limited public ed and outreach efforts and stewardship opportunities. Now that this (COVID-19) is part of world, planning for future events and limitations that Permittees may experience due to such events is needed. **(Phase I)**

Stewardship definition (including more activities)

- Define "stewardship" in definitions. For example, is Adopt-a-Drain a behavior changes or a stewardship activity? Overall, we appreciate the brevity and clarity of this section. It gives jurisdictions clear examples and is broad enough for jurisdictions to personalize for their community. No real changes needed in this section. **(Phase I)**
- We appreciate that this provides opportunities to partner with other agencies.
- Some activities are missing. Add more types of activities to the lists: rain garden workshops, planting and maintenance events... also to riparian plantings, please change to invasive plant removal and planting of riparian habitat buffers. More types of activities make it easier for permittees to comply and more beneficial project types will be supported. **(non-profit partner)**
- Suggest adding "invasive species removal" to list of activities. **(Phase II)**
- Request clarification for how to meet stewardship criteria. For example, we have volunteer groups that regularly do restoration work and invasive species removal in several City parks, but our staff is not necessarily present. Are we still able to count these as stewardship efforts since they are on public land and are with organizations we partner with? As jurisdictions jump onboard with Hamline University's "Adopt-A-Drain" program, consider adding it specifically as a stewardship option. **(Phase II)**
- Adding clarification about what counts as stewardship will help jurisdictions that struggle with providing opportunities be able to find creative ways to meet the requirement.
- Health should be added because stormwater has health impacts and overburdened communities may not see a nexus here with the above types of activities- need to be culturally aware and consider adding other examples to this list. Work with neighborhood residents on language. The permit language needs to be vetted with the subject of the permit- which is people in neighborhoods, not regulators **(non-profit partner)**
- What is meant by the word "advertise?" Storm drain adoption programs are not included in the language. Solution: Change "Advertise" with "promote and add the words storm drain adoption and cleaning. **(Phase II)**
- Change the word "advertise" with "promote" Add the words storm drain adoption and cleaning.
- Meriam Webster definition: *the conducting, supervising, or managing of something especially : the careful and responsible management of something entrusted to one's care; stewardship of natural resources.* Would this definition indicate that local jurisdiction regulation or promotion of regional initiatives for private storm facilities and source control simultaneously promote stewardship? 'management of something entrusted to one's care' could apply to private storm systems or source control that protects the MS4. Should there be documentation of regulation of sites and industrial activities as a stewardship activity?
-

MS4 Boundary

- Remove activities that are not associated with the MS4 area: stream teams, riparian plantings. Yep, they are great community activities, yet if it is outside the MS4, it is not covered by the Permit. Remove non-MS4 related stewardship opportunities. OR clarify that the stewardship opportunities have to occur within the MS4 area. Otherwise, it is not covered by the Permit. Justification is to Limit to what the Permit covers.
- This seems mostly irrelevant to MS4 unless your stewardship is adopting a drain or outfall maintenance. I like stewardship but seems outside the permit scope. Educational opportunities

make sense - that seems more like general awareness though. I like the flexibility to advertise opportunities being held by partners like KCD, King County, Mountains to Sound, etc. (Phase II)

- To be fair, the permit contains umbrella language in S1, but I've encountered a number of E&O staff and managers that are unaware how the language in that section provides the overarching context for the rest of the Permit's obligations
- The focus of the work should take place within the MS4 or have application to the MS4.
Proposed solution: Each Permittee shall provide and/or advertise stewardship opportunities and/or partner with existing organizations (including non-permittees) to encourage residents to participate in activities or events planned and organization within "MS4 area(s) of" the community **(Phase I)**
-
-

Stewardship Opps

- We are finding it harder and harder to find people willing to volunteer. You can't force people to volunteer. The problem is the permit is a one size fits all. Smaller communities struggle now meeting the NPDES guidelines and every permit cycle more is required. Smaller communities may NOT have near as many civic organizations where we can spread the word and get people involved. Reasoning: Cost incurred every time there is a change, seems like every year we have to re-write or revise a code to meet the NEW standard. We don't have staff to write code and the Consultant fees we pay in order to comply with the updates is crippling us.
- Should include regional opportunities. Some communities struggle with stewardship activities that truly qualify. **(Phase II)**
- I agree that this is a positive way to engage communities directly in water quality/habitat improvements. **(2ndary permittee)**
- During the previous permit dvpt cycle, I recall Ecology floating the question as to whether this should be removed from the permit. That didn't go over well in some circles, but with some of the workload issues conveyed above, perhaps it should be reconsidered, perhaps at least as part of a menu of options to meet E&O-related obligations

Appendix II
Listening Session Google Slide
Comments

Breakout Session

Breakout Rooms 1-3

Breakout Room Logistics -

1. Please elect a reporter & timer!

2. For each section, allow time to review, discuss and create stickies to answer:

- Are there issues raised by the language in this section of the permit?
- Proposed solution/recommendation for changing the permit language.
- Justification or rationale for the proposed change(s).

Part 1 - Public Education and Outreach

The SWMP shall include an education and outreach program designed to: Build general awareness about methods to address and reduce impacts from stormwater runoff. Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. Create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

Permittees may choose to meet these requirements individually or as a member of a regional group. Regional collaboration on general awareness or behavior change programs, or both, includes Permittees developing a consistent message, determining best methods for communicating the message, and when appropriate, creating strategies to effect behavior change. If a Permittee chooses to adopt one or more elements of a regional program, the Permittee should participate in the regional group and shall implement the adopted element(s) of the regional program in the local jurisdiction.

The minimum performance measures are: Each Permittee shall implement an education and outreach program for the area served by the MS4. The program design shall be based on local water quality information and target audience characteristics to identify high priority target audiences, subject areas, and/or BMPs. Based on the target audience's demographic, the Permittee shall consider delivering its selected messages in language(s) other than English, as appropriate to the target audience. 4

Part 1

Copy and paste these text

- Are there issues raised by the language in this section of the permit?
- Proposed solution/recommendation for changing the permit language.
- Justification or rationale for the proposed change(s).

What is the goal for the permit - are the e/o reqts have an impact in the env of development and with pop inc? And how to get juris to get resources into this work - need to define the fte, budget, - they need to be serious about what that looks like - can hire contractor to do that work then, otherwise no budget or fte is assigned. However - the pretreatment permit reqs a certain number of fte - why humans need to be part of the solution and needs to be valued and funded

Language needs to be stronger to ensure equitable access to E&O materials and programs

add comment about sense of place and connection to the watershed, local waterways, aquatic habitats and wildlife and Puget Sound/Salish Sea

In same boat - an operator, public works supvr - difficult to 'just do it' post social media info on city, and training offered in future - tossed into this element,

No issues with the language

Trying to do a campaign on comingling haz waste - by herself it is difficult

Trying to figure out how to reach industrial, commercial audiences - ad costs high, what is mechanism to reach audiences

There is a lack of recognition of the global impact of climate change on our work, communities and the role of stormwater or investment - what is the overall community engagement goal of Ecology's work? How can we use the power of these dedicated folks to address environmental outcomes we hope to see? Are we missing the big issue by focusing on local details, not having an overall shared goal? E.g. strategic messaging focus: climate change - human environmental health- economic health -role of stormwater WQ and infrastructure. We could have a reqt for other skill sets: social scientists, urban planners, econmists to pull the big picture together - and allow individual stormwater managers to feel successful and that they are contributing. Also - placing education on stormwater managers risks rmay not be the best approach for ed - we need to call out that skill set - rather than assuming anyone can be an educator. We risk traumatizing or turning off students, esp those from underserved communities. -

Remove consider replace with shall deliver its selected messages in language(s) other than English, as appropriate to the target audience.

IDDE - brb, no issues with language

No issues with the language

Change language from "target audience" to "focus audience" or other similar wording avoiding the word "target" throughout permit.

f required to set aside budget or FTE for this task it might get somewhere - if there were coordinatoin outside sm jurisdictions that focused on behavior/audiences - eg haz waste mitigation would be helpful

Run NPDES Pro - has the contacts, but stuck on how to create educational campaign for audiences - training would be good

No resources for mgmt commitment to identify WQ issues - challenging to do this level of work, challenge is only one staff - doing door to door engagement

Part 2 - General Awareness

To build general awareness, Permittees shall annually select at a minimum one target audience and one subject area from either (a) or (b):

(a) Target audiences: General public (including overburdened communities, or school age children) or businesses (including home-based, or mobile businesses). Subject areas:

- General impacts of stormwater on surface waters, including impacts from impervious surfaces.
- Low impact development (LID) principles and LID BMPs.

(b) Target audiences: Engineers, contractors, developers, or land use planners.

Subject areas:

- Technical standards for stormwater site and erosion control plans.
- LID principles and LID BMPs.
- Stormwater treatment and flow control BMPs/facilities

(c) Permittees shall provide subject area information to the target audience on an ongoing or strategic schedule.

Part 2 - General Awareness

- Are there issues raised by the language in this section of the permit?
- Proposed solution/recommendation for changing the permit language.
- Justification or rationale for the proposed change(s).

At least that is more clear and spelled out

The quarterly Shop Talk pub language is sent out email list for NPDES sites

Social media is not nec great for everyone, google ads cost were too high, inspections and spil response req's time, e/o takes too much time, sustained and effort to create and follow through with strategy - too difficult to have a person respond to and be responsible for all that

I wear many hats - do all utilities in city of Algona, not sure how to go about fulfilling these

Appreciate the broad categories for audience.

Other city web sites and SW pages, e.g. Kent - have good informational page, who does Kent or other groups use to create that info? Need web support - outside consulting would be helpful

Audience selection isnt too difficult

Clarification on mobile business—just those in your city of those that travel between jurisdictions

If the permit specified a certain expertise, fte, budget needed to do this work - we do not get the reseruces to do this work, and everyday time this gets larger - we don't get a new person falls to the same

Like that audiences and topics are broadly defined.

Use "priority audience" or "audience" instead of "target audience".

How detailed does awareness to audience b need to be? A technical class? A flyer of what's available sent out?

Copy and paste these text boxes to add more text squares



Part 3 - Behavior Change (Audience & BMPs)

Behavior change. To affect behavior change, Permittees shall select, at a minimum, one target audience and one BMP.

(a) Target Audiences: Residents, landscapers, property managers/owners, developers, school age children, or businesses (including home-based or mobile businesses).

BMPs:

- Use and storage of: pesticides, fertilizers, and/or other household chemicals.
- Use and storage of: automotive chemicals, hazardous cleaning supplies, carwash soaps, and/or other hazardous materials.
- Prevention of illicit discharges. • Yard care techniques protective of water quality. • Carpet cleaning.
- Repair and maintenance BMPs for: vehicles, equipment, and/or home/buildings. • Pet waste management and disposal.
- LID Principles and LID BMPs. • Stormwater facility maintenance, including LID facilities. • Dumpster and trash compactor maintenance.
- Litter and debris prevention. • Sediment and erosion control.
- (Audience specific) Source control BMPs (refer to S5.C.8). • (Audience specific) Locally-important, municipal stormwater-related subject area.

Part 3 - Behavior Change (Implementation and Evaluation)

No later than July 1, 2020, each Permittee shall conduct a new evaluation of the effectiveness of an ongoing behavior change campaign (required under S5.C.1.a.ii and S5.C.1.c of the 2013 Permit). Permittees shall document lessons learned and recommendations for which option to select from S5.C.2.a.ii.(c). Permittees that select option S5.C.2.a.ii.(c)3, below, may forgo this evaluation if it will not add value to the overall behavior change program.

Based on the recommendation from S5.C.2.a.ii.(b), by February 1, 2021, each Permittee shall follow social marketing practices and methods, similar to community-based social marketing, and develop a campaign that is tailored to the community, including development of a program evaluation plan. Each Permittee shall:

1. Develop a strategy and schedule to more effectively implement the existing campaign; or
2. Develop a strategy and schedule to expand the existing campaign to a new target audience or BMPs; or
3. Develop a strategy and schedule for a new target audience and BMP behavior change campaign.

(d) No later than April 1, 2021, begin to implement the strategy developed in S5.C.2.a.ii.(c).6

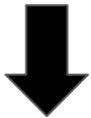
(e) No later than March 31, 2024, evaluate and report on:

1. The changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy;
2. Any planned or recommended changes to the campaign in order to be more effective; describe the strategies and process to achieve the results.

(f) Permittees shall use results of the evaluation to continue to direct effective methods and implementation of the ongoing behavior change program.

Part 3 - Behavior Change

Copy and paste these text boxes to a more text squares



Community Based Social Marketing should not be used as the "catch all" phrase for behavior change programs. Most of what local jurisdictions are doing would qualify as social marketing, but is NOT CBSM.

Are there is Proposed so Justification

We did dumpster outreach and may switch to adopt a drain (because it is prepackaged)

Missing a requirement for staff, funding, etc

Hard to measure the uptick in these programs - e.g. adopt a drain - not clear how to collect that data

by the language in this section of the permit? Recommendation for changing the permit language. We for the pr

This is a VERY difficult (impossible?) requirement for a small jurisdiction on their own. Give resources along with permit and remind permittees that they can collaborate to meet this requirement.

Behaviour change is a long haul vs spill response

Timeline wound up being heavily front-loaded in terms of work.

We are required to measure the understanding of a behavior change, but understanding may not have any bearing on people's willingness to adopt a behavior. Therefore, it would be more meaningful for permittees to measure actual behavior change and/or intention to change behavior.

Tiny jurisdiction - no schools, few industrial, other businesses - that limits the options

Consider labeling sections with words instead of numbers

The city lookst residents as audience - biz don't vote, but they do bring in \$ in light industrial category - there is a small residential area, large biz/industrial area - no mechanism for outreach

Timeline language needs to be more clear

What does implementation mean?

Add commuters to target audience

BMP list not complete. Include pressure washing and BMPs to address 6 PPD Quinone if possible.

Consider adding Adopt a Drain to BMP

When we are rapidly developing - trying to put adopt a drain into action is not taken seriously

What do we need to include in our annual report?

We will have 60more source control with new reqts - so staff does not inc and one NDPES staff is now doing 8 reqts - esp when you are not the tech expert in some to the reqts

Current format is good.

Need better guidance on how to proceed of you want to keep and expand your existing program.

Use health in all policies sim to public health - create an health n all enviroentmet - embedded in policy would help - we are competing econmic development and other things. Lack of urban planners

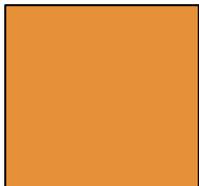
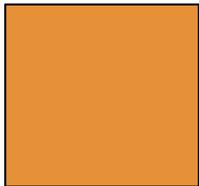
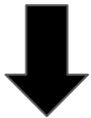
Part 4 - Stewardship

Each Permittee shall provide and advertise stewardship opportunities and/or partner with existing organizations (including non-permittees) to encourage residents to participate in activities or events planned and organized within the community, such as: stream teams, storm drain marking, volunteer monitoring, riparian plantings, and education activities.

Part 4 - Stewardship

- Are there issues raised by the language in this section of the permit?
- Proposed solution/recommendation for changing the permit language.
- Justification or rationale for the proposed change(s).

Copy and paste these text boxes to add more text squares



COVID

Very challenging with covid

This requirement has become more difficult to meet due to COVID. Volunteers are reluctant and it's more difficult to ensure that protocols are being followed.

Stewardship Definition

Include a definition of what constitutes stewardship.

Clear wording. Like that it allows for partnering to meet this requirement.

Overall, wording seems better in permit, but improvement still needed.

Do stewardship events still count if they're held on public land but not organized or attended by jurisdictional staff?

No time to pull stewardship - call schools enviro ed - they have no time, local library for speakers burea to add folks to - community members to speak or attend - dont have that. No audio/visual room reserouces to create that. building community house - don't have time to fit thi on their agenda, hard to get jurisditon behind effort, need virtual platform experts to help support that,

Stewardship Opps

Econet - missing investment in shared promotion - stronger connection with cities and partnerships

Positives

Like that there are org in king county that we can point ot, doing stewardship work

Existing wording is fine. Partnering is good.

Breakout Session

Breakout Rooms 4-6

Part 1 - Public Education and Outreach

The SWMP shall include an education and outreach program designed to: Build general awareness about methods to address and reduce impacts from stormwater runoff. Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. Create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

Permittees may choose to meet these requirements individually or as a member of a regional group. Regional collaboration on general awareness or behavior change programs, or both, includes Permittees developing a consistent message, determining best methods for communicating the message, and when appropriate, creating strategies to effect behavior change. If a Permittee chooses to adopt one or more elements of a regional program, the Permittee should participate in the regional group and shall implement the adopted element(s) of the regional program in the local jurisdiction.

The minimum performance measures are: Each Permittee shall implement an education and outreach program for the area served by the MS4. The program design shall be based on local water quality information and target audience characteristics to identify high priority target audiences, subject areas, and/or BMPs. Based on the target audience's demographic, the Permittee shall consider delivering its selected messages in language(s) other than English, as appropriate to the target audience. 4

Part 1 - Public Education and Outreach

Copy and paste these text boxes to add more text squares



- Are there issues raised by the language in this section of the permit?
- Proposed solution/recommendation for changing the permit language.
- Justification or rationale for the proposed change(s).

Instead of "local" water quality data, use "Regional" as some jurisdictions don't have hyper-localized data to pull from

Regional water quality data if local water quality data is unavailable

Maintain regional language. "Local water quality" is very ambiguous, what are the data requirements? Define what qualifies. How does one incorporate local data?

"Based on the target audience's demographic, the Permittee shall consider delivering its selected messages in language(s) other than English, as appropriate to the target audience." I'm curious if this section could be reworded to actually get at what is intended. Just translation does not always support actual behavior change. How else could this be targeted?

5: Local WQ information limits to local - suggest change to regional

5: Languages other than English - translation may not be enough. Need to consider cultures - transcreation.

5: Ensure targeting underserved or underrepresented communities.

"general awareness" is weak and I don't feel that will elicit change. There needs to be a hook, something meaningful to make people care and want to change. This involves researching the demographic.

Part 2 - General Awareness

To build general awareness, Permittees shall annually select at a minimum one target audience and one subject area from either (a) or (b):

(a) Target audiences: General public (including overburdened communities, or school age children) or businesses (including home-based, or mobile businesses). Subject areas:

- General impacts of stormwater on surface waters, including impacts from impervious surfaces.
- Low impact development (LID) principles and LID BMPs.

(b) Target audiences: Engineers, contractors, developers, or land use planners.

Subject areas:

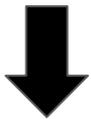
- Technical standards for stormwater site and erosion control plans.
- LID principles and LID BMPs.
- Stormwater treatment and flow control BMPs/facilities

(c) Permittees shall provide subject area information to the target audience on an ongoing or strategic schedule.

Part 2 - General Awareness

- Are there issues raised by the language in this section of the permit?
- Proposed solution/recommendation for changing the permit language.
- Justification or rationale for the proposed change(s).

Copy and paste these text boxes to add more text squares



Agreed

Include "People experiencing homelessness" in the list for general public under Target Audience

Seems ok

The way this section is written is pretty broad and allows for jurisdictions of all sizes to choose what works for them. Essentially - no edits needed here

+1 Does Surface water have to include impervious, or is it an example?

[Empty green text box]

[Empty green text box]

[Empty green text box]

5: Create a category that allows community to select audience and topic that's unique - and provide for justification

5: Audiences such as agriculture, homeowners are not accommodated

5: Not as clear as the behavior change section - model after Behavior Change section

5: Schedule - ongoing and strategic are very different. Better define the expected level of effort

5: School age children and children in school are very different - make these separate audiences

And teachers - a very effective audience to "target" or focus on

Again, I feel like the term "General Awareness" is weak and not ambitious enough.

I wonder about putting a % of people or some other number requirement. Larger municipalities need to connect with more people than smaller but there should be a minimum/yr or per permit cycle

Part 3 - Behavior Change (Audience & BMPs)

Behavior change. To affect behavior change, Permittees shall select, at a minimum, one target audience and one BMP.

(a) Target Audiences: Residents, landscapers, property managers/owners, developers, school age children, or businesses (including home-based or mobile businesses).

BMPs:

- Use and storage of: pesticides, fertilizers, and/or other household chemicals.
- Use and storage of: automotive chemicals, hazardous cleaning supplies, carwash soaps, and/or other hazardous materials.
- Prevention of illicit discharges. • Yard care techniques protective of water quality. • Carpet cleaning.
- Repair and maintenance BMPs for: vehicles, equipment, and/or home/buildings. • Pet waste management and disposal.
- LID Principles and LID BMPs. • Stormwater facility maintenance, including LID facilities. • Dumpster and trash compactor maintenance.
- Litter and debris prevention. • Sediment and erosion control.
- (Audience specific) Source control BMPs (refer to S5.C.8). • (Audience specific) Locally-important, municipal stormwater-related subject area.

Part 3 - Behavior Change (Implementation and Evaluation)

No later than July 1, 2020, each Permittee shall conduct a new evaluation of the effectiveness of an ongoing behavior change campaign (required under S5.C.1.a.ii and S5.C.1.c of the 2013 Permit). Permittees shall document lessons learned and recommendations for which option to select from S5.C.2.a.ii.(c). Permittees that select option S5.C.2.a.ii.(c)3, below, may forgo this evaluation if it will not add value to the overall behavior change program.

Based on the recommendation from S5.C.2.a.ii.(b), by February 1, 2021, each Permittee shall follow social marketing practices and methods, similar to community-based social marketing, and develop a campaign that is tailored to the community, including development of a program evaluation plan. Each Permittee shall:

1. Develop a strategy and schedule to more effectively implement the existing campaign; or
2. Develop a strategy and schedule to expand the existing campaign to a new target audience or BMPs; or
3. Develop a strategy and schedule for a new target audience and BMP behavior change campaign.

(d) No later than April 1, 2021, begin to implement the strategy developed in S5.C.2.a.ii.(c).6

(e) No later than March 31, 2024, evaluate and report on:

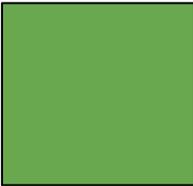
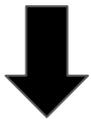
1. The changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy;
2. Any planned or recommended changes to the campaign in order to be more effective; describe the strategies and process to achieve the results.

(f) Permittees shall use results of the evaluation to continue to direct effective methods and implementation of the ongoing behavior change program.

Part 3 - Behavior Change

- Are there issues raised by the language in this section of the permit?
- Proposed solution/recommendation for changing the permit language.
- Justification or rationale for the proposed change

Copy and paste these text boxes to add more text squares



Just a note here - a lot of smaller jurisdictions do not have an E&O dedicated person, so learning about social marketing is already a huge lift. How can this section be re-written to be inclusive of smaller jurisdictions with limited time and resources?

5: Section is overly complicated - a flow chart, table, timeline and/or fact sheets on how to implement may make this clearer.

Would 3.(d) include research?

Organized, collaboration across the west side would make it easier for everyone to access materials. Would be nice to see this represented in the permit. Ex: provide a public repository where people can

The list of BM too extensive so many topics be more beneficial data driven results focused on areas would also be that have limited was one unified

5: First part is clear with audience and BMP, and last line allows for rural options (focus otherwise seems more urban).

Include option to switch behavior change topic/audience within current permit cycle if it is found to be ineffective or too challenging to implement for the jurisdiction. For example if the jurisdiction opted for the regional campaign give them the option to leave that campaign and focus on their own.

CBSM training & education courses aren't cheap and cost prohibitive for smaller jurisdictions

5: More options or emphasis on rural issues

Add language and specificity for what a program evaluation should look like

5: Last line (results): not clear when 'f' is due (and how it fits in 5-year cycle).

S5.C.2.ii.(c) and (d) should be removed in the next permit since the program is evaluated and we will continue to direct effective methods and implementation of the ongoing behavior change program.

For smaller jurisdictions banding together with a regional group is the only practical way to get this done

Expand language to include that permittees can participate in regional CBSM or social marketing campaigns

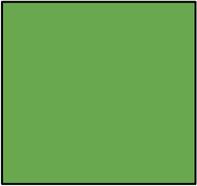
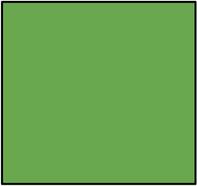
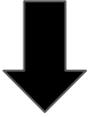
Part 4 - Stewardship

Each Permittee shall provide and advertise stewardship opportunities and/or partner with existing organizations (including non-permittees) to encourage residents to participate in activities or events planned and organized within the community, such as: stream teams, storm drain marking, volunteer monitoring, riparian plantings, and education activities.

Part 4 - Stewardship

- Are there issues raised by the language in this section of the permit?
- Proposed solution/recommendation for changing the permit language.
- Justification or rationale for the proposed change(s).

Copy and paste these text boxes to add more text squares



COVID

Should this be listed as in person or virtual? Given that stewardship themed education had to be provided virtually over the pandemic

Specify a virtual option for stewardship opportunities give the current state of limited or restricted in person events

Stewardship Definition

5: Set a minimum expectation

Would like to see a minimum requirement based on population size

The public can be "encouraged" but not made to participate. Should not require a minimum.

Stewardship Opps

5: Allow blending with habitat conservation (ex. ESA, critical habitat). Recognize this is not disallowed, but including an example of this would help.

MS4 Boundary

Would like to see ECY provide more formal ways to collaborate and share resources across the west side. There could be a database or website that houses these opportunities

Positives

Appreciate the openness to different types of opportunities or events that can meet this requirement.

No changes r

In general (not stewardship specific) Would be nice if ecolo created a list of improvements or com gaps in requirements jurisdictions are makin

Breakout Session

Breakout Rooms 7-9

Part 1 - Public Education and Outreach

The SWMP shall include an education and outreach program designed to: Build general awareness about methods to address and reduce impacts from stormwater runoff. Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. Create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

Permittees may choose to meet these requirements individually or as a member of a regional group. Regional collaboration on general awareness or behavior change programs, or both, includes Permittees developing a consistent message, determining best methods for communicating the message, and when appropriate, creating strategies to effect behavior change. If a Permittee chooses to adopt one or more elements of a regional program, the Permittee should participate in the regional group and shall implement the adopted element(s) of the regional program in the local jurisdiction.

The minimum performance measures are: Each Permittee shall implement an education and outreach program for the area served by the MS4. The program design shall be based on local water quality information and target audience characteristics to identify high priority target audiences, subject areas, and/or BMPs. Based on the target audience's demographic, the Permittee shall consider delivering its selected messages in language(s) other than English, as appropriate to the target audience. 4

Part 1 - Public Education and Outreach

- Are there issues raised by the language in this section of the permit?
- Proposed solution/recommendation for changing the permit language.
- Justification or rationale for the proposed change(s).

Suggest changing language from “local” water data to allow/include “regional” water quality data. Not everyone has access to data.

Add wording of “social science” to help further define what behavior change means. Think “behavior change” program needs to be better and more specifically defined.

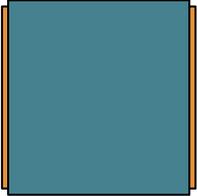
“Promote” rather than create stewardship opportunities. Allows for working with partners. Provide a nudge towards equity and justice.

Suggest not using acronyms (MS4) as folks may not have read previous sections in which the acronym is defined.

“The program design shall be based on local water quality information.” Needs to be more elaborate or explicit as this language doesn’t give enough guidance; however having some flexibility is positive. Proposed solution: Provide guidance on how jurisdictions could use local water quality and/or illicit discharge information to help prioritize efforts.

Some kind of language that encourages an equity and environmental justice lens be applied to audience identification and focus (targetting language may be problematic)

Copy and paste these text boxes to add more text squares



Part 2 - General Awareness

To build general awareness, Permittees shall annually select at a minimum one target audience and one subject area from either (a) or (b):

(a) Target audiences: General public (including overburdened communities, or school age children) or businesses (including home-based, or mobile businesses). Subject areas:

- General impacts of stormwater on surface waters, including impacts from impervious surfaces.
- Low impact development (LID) principles and LID BMPs.

(b) Target audiences: Engineers, contractors, developers, or land use planners.

Subject areas:

- Technical standards for stormwater site and erosion control plans.
- LID principles and LID BMPs.
- Stormwater treatment and flow control BMPs/facilities

(c) Permittees shall provide subject area information to the target audience on an ongoing or strategic schedule.

Part 2 - General Awareness

- Are there issues raised by the language in this section of the permit?
- Proposed solution/recommendation for changing the permit language.
- Justification or rationale for the proposed change(s).

Copy and paste these text boxes to add more text squares



The language around including overburdened communities is unclear. General awareness should be broad but the language spells out very specific target audiences. We do want to include overburdened communities but the parenthetical language is confusing.

Suggested language: Remove "Including" For examples: OC, school age, businesses.

Ongoing or strategic schedule are two separate things. Does Ecology want to see periodic schedules/reports? More clarity under bullet 3 would be appreciated.

Change "target" to "priority" audience.

Could make language a little stronger to specify how many audiences are required. For example, change phase I to require more than one audience selection.

Overall, reformat to make it more reader friendly.

General awareness sections vary between phase one and two. Align language to encourage regional collaboration. Words like "and" and "or" change the meaning drastically. Consistency is required. Phase one does not get to choose between a, b, c audiences, they have to target all. This can affect funding.

Define BMPs in this section and either define "overburdened communities" or point to glossary for definition.

"Target audiences: Engineers, contractors, developers, or land use planners." Add stormwater facility owners and/or maintenance staff.

Part 3 - Behavior Change (Audience & BMPs)

Behavior change. To affect behavior change, Permittees shall select, at a minimum, one target audience and one BMP.

(a) Target Audiences: Residents, landscapers, property managers/owners, developers, school age children, or businesses (including home-based or mobile businesses).

BMPs:

- Use and storage of: pesticides, fertilizers, and/or other household chemicals.
- Use and storage of: automotive chemicals, hazardous cleaning supplies, The program design shall be based on local water quality information carwash soaps, and/or other hazardous materials.
- Prevention of illicit discharges. • Yard care techniques protective of water quality. • Carpet cleaning.
- Repair and maintenance BMPs for: vehicles, equipment, and/or home/buildings. • Pet waste management and disposal.
- LID Principles and LID BMPs. • Stormwater facility maintenance, including LID facilities. • Dumpster and trash compactor maintenance.
- Litter and debris prevention. • Sediment and erosion control.
- (Audience specific) Source control BMPs (refer to S5.C.8). • (Audience specific) Locally-important, municipal stormwater-related subject area.

Part 3 - Behavior Change (Implementation and Evaluation)

No later than July 1, 2020, each Permittee shall conduct a new evaluation of the effectiveness of an ongoing behavior change campaign (required under S5.C.1.a.ii and S5.C.1.c of the 2013 Permit). Permittees shall document lessons learned and recommendations for which option to select from S5.C.2.a.ii.(c). Permittees that select option S5.C.2.a.ii.(c)3, below, may forgo this evaluation if it will not add value to the overall behavior change program.

Based on the recommendation from S5.C.2.a.ii.(b), by February 1, 2021, each Permittee shall follow social marketing practices and methods, similar to community-based social marketing, and develop a campaign that is tailored to the community, including development of a program evaluation plan. Each Permittee shall:

1. Develop a strategy and schedule to more effectively implement the existing campaign; or
2. Develop a strategy and schedule to expand the existing campaign to a new target audience or BMPs; or
3. Develop a strategy and schedule for a new target audience and BMP behavior change campaign.

(d) No later than April 1, 2021, begin to implement the strategy developed in S5.C.2.a.ii.(c).6

(e) No later than March 31, 2024, evaluate and report on:

1. The changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy;
2. Any planned or recommended changes to the campaign in order to be more effective; describe the strategies and process to achieve the results.

(f) Permittees shall use results of the evaluation to continue to direct effective methods and implementation of the ongoing behavior change program.

Part 3 - Behavior Change

- Are there issues raised by the language in this section of the permit?
- Proposed solution/recommendation for changing the permit language.
- Justification or rationale for the proposed change(s).

Target audience language could be wider. For example, broaden school age youth to include college students. Or young adults - interns and youth bound for employment paths.

Language allows jurisdiction to choose audience and subject, very valuable. Flexibility allows us to address local issues. We encourage ecology to keep.

Some questions about how the behavior change campaign language will be modified. Want to make sure that it is sustainable and that it allows for jurisdictions to seek long-term changes.

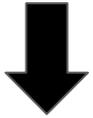
Behavior change/social marketing steps do not necessarily include education in order to achieve the behavior change; therefore reporting on changes in understanding may not always be applicable.

Ecology needs to request documentation for each milestone. Example "July 1st 2020 conduct evaluation", but ecology never asks for proof.

Between bullet D & E, leaves a lot of ambiguity and would like to see more benchmarks on what is expected and what those timelines are

Change community-based social marketing back to social marketing, it represents more global approach.

Copy and paste these text boxes to add more text squares



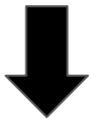
Part 4 - Stewardship

Each Permittee shall provide and advertise stewardship opportunities and/or partner with existing organizations (including non-permittees) to encourage residents to participate in activities or events planned and organized within the community, such as: stream teams, storm drain marking, volunteer monitoring, riparian plantings, and education activities.

Part 4 - Stewardship

- Are there issues raised by the language in this section of the permit?
- Proposed solution/recommendation for changing the permit language.
- Justification or rationale for the proposed change(s).

Copy and paste these text boxes to add more text squares



COVID

Stewardship Definition

Recommending partnerships is a good aspect here. If a few examples were included (conservation districts, local community based orgs etc.) that might be helpful. And better not to reinvent programs if community groups are already leading them.

Riparian and stream teams don't have anything to do with MS4, but it is a good thing to keep for smaller jurisdictions

Stewardship Opps

MS4 Boundary

Positives

Do not change, it is customizable by jurisdictions