

**Response to Comments on May 11, 2015 Tentative Order
Provision C.7. – Public Information and Outreach**

Commenter	Comment No.	Provision No.	Key Word(s)	Comment	Response	Proposed MRP Revision
ACCWP	40b	C.7	Allow Greater Flexibility	Proposed alternative approach that allows greater flexible while still ensuring that the outreach will be effective.	Water Board staff has taken into consideration the comment and has made changes to C.7.b.-c.	See changes in Provision C.7.b.-c.
ACCWP	66	C.7	Change Language to Goal Statement	Each Permittee shall increase the awareness of the target audiences regarding the impacts of stormwater pollution on receiving water and potential solutions to mitigate the problems caused; positively influence the waste disposal and runoff pollution generation behavior of target audiences by encouraging implementation of appropriate solutions; and involve residents in mitigating the impacts of stormwater pollution.	See revised goal statement in Revised Tentative Order.	See revised goal statement in Revised Tentative Order.
CCCWP SMCWPPP	37 28	C.7	Consolidate Public Information and Outreach Sections	Relocate all public outreach-related tasks to Provision C.7, thereby creating one comprehensive public outreach provision. The provisions that currently include outreach tasks should instead refer to Provision C.7. This approach would be beneficial to Permittees and countywide programs for both identifying outreach tasks and compliance reporting.	Any public outreach or involvement events required under other provisions of the permit may be conducted under Provision C.7.	None.
Concord	3	C.7	Regional Public Outreach and Education	Focus advertising campaigns, media relations, public outreach events, and stormwater pollution prevention education at a regional level. This would be more effective than individual campaigns by permittees or countywide programs. There is great value in	Water Board staff agrees that there is great value in having consistent messages throughout the region on stormwater pollution prevention. A number of the subprovisions already allow and encourage the Permittees to	None.

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				consistent message throughout the region.	conduct the requirements at the regional or countywide level. Permittees still need to conduct some outreach events locally or at the countywide level to effectively reach more of their residents with the same or similar stormwater runoff pollution prevention messages being disseminated at the regional level.	
SMCWPPP	27	C.7	Add Language to Allow a Comparable Plan	Include language stating that Permittees may comply with the requirements of Provision C.7 through development of a comparable education and outreach plan that addresses the overall objectives of the Provision.	During Permit development, Water Board staff has said it was very open to input on alternative requirements for C.7. that will result in meaningful and effective outreach actions, and we requested that the Permittees submit a proposed plan that could be incorporated into the Permit. Rather than proposing a plan, the Permittees suggested language allowing submittal of a plan during the coming Permit term. Requiring development of a plan to meet public outreach requirements in the Permit is cumbersome. Water Board staff would be interested in working with Permittees to develop a comparable education and outreach plan that would overhaul the entire provision to provide more flexibility and it	None.
SMCWPPP	30b	C.7.e	Eliminate Table 7.1 and Associated Requirements	Eliminate the requirement for a specific number of events by population. Instead specify a framework that emphasizes engagement activities to be implemented at the discretion of each municipality based on a menu that includes tabling events, social media campaigns, presentations, workshops, cleanups, community based social marketing, collaboration with watershed stewardship groups, new printed promotional materials, and advertising. Require each municipality to select and implement a minimum of three activities from the menu, and establish accountability		

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				through the reporting section, where each municipality would justify why it chose the selected activities and document the effectiveness of its choices. Include language that would allow municipalities to team up on activities at their discretion. This would give municipalities more freedom to tailor outreach activities to their community needs and budgets.	would be submitted with the next Report of Waste Discharge for reissuance of the Permit.	
ACCWP	71	C.7.b	Change Language of Advertising Campaigns	Proposed language: Permittees shall develop and implement an Outreach Plan (may be developed at the countywide or regional level) designed to meet the goals of C.7.b.i. The Plan shall include advertising, social media, media relations, community involvement/watershed stewardship, and participation in outreach events. The Plan will be implemented at the local, countywide and/or regional level.	Requiring a development of a plan to meet public outreach requirements in the Permit is cumbersome. C.7.b. needs to be definitive and have set deliverables. However, Water Board staff has taken into consideration the comments and has made changes to C.7.b.-c. to provide a greater degree of flexibility and to acknowledge the changing landscape of free media.	See changes in Provision C.7.b.-c.
ACCWP	72	C.7.b.iii	Delete Reporting Requirements	Delete existing reporting requirements. Insert: Permittees shall report on the local, countywide, and regional implementation of the Outreach Plan in each annual report. At least once during the Permit term, Permittees will assess effectiveness of Outreach Plan implementation.		
Baykeeper	10	C.7.a	Maintain 100% of Markings	Over the course of the Permit term, Permittees should be able to inspect and maintain all of the storm drain inlet markings of municipality-	Many Permittees ensure that their storm drain inlet markings are legible annually as part of their storm drain inlet cleaning	None.

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				maintained inlets, rather than the 80% required in the Permit.	program before the rainy season. However, some Permittees are staff-challenged to get to every residential neighborhood. The Permit sets an appropriate goal.	
CCCWP Clayton Concord Danville El Cerrito Hercules Martinez Moraga Oakley Orinda Pinole Pleasant Hill San Pablo San Ramon	38 46 29 29 35 26 32 23 13a 26 22 25 25 32	C.7.a	Move Storm Drain Marking Requirement to C.2.	Move requirement to mark and maintain "no dumping" markings on storm drain inlets to C.2.	While there may be overlaps into provisions C.2. and C.3., Storm Drain Inlet Markings is a public education component and therefore belongs in C.7.	None.
ACCWP	67	C.7.a.i	Move Requirement to C.2. and C.3.	Move to C.2: Permittees shall have a program to mark and maintain municipally-maintained storm drain inlets with an appropriate stormwater pollution prevention message, such as "No dumping, drains to Bay" or equivalent. Move to C.3: For newly-approved, privately-maintained streets, Permittees shall require inlet marking by the project developer upon construction and maintenance of markings through the development maintenance entity. Markings shall be verified prior to		

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				acceptance of the project.		
Dublin	10	C.7.a.i and C.7.a.ii	Move Requirement to C.2. and C.3.	Move the marking of municipally-maintained inlets requirement to Provision C.2 and move the marking of privately-maintained inlets to Provision C.3.	While there may be overlaps into provisions C.2. and C.3., Storm Drain Inlet Markings is a public education component and therefore belongs in C.7.	None.
ACCWP	69	C.7.a.iii	Move Requirement to C.2. and C.3.	C.2: Report on implementation of the program once per permit term. C.3: Confirm that SD marking is verified prior to acceptance.		
ACCWP	68	C.7.a.ii	Delete	Delete Implementation Level	The commenter has not provided a basis for deleting the implementation level. The proposed minimum inspection requirements of 80% of marked municipality-maintained storm drain inlets, and verification of markings on privately-maintained streets prior to acceptance of the project, with a maintenance agreement, sets an appropriate balance.	None.
CCCWP Clayton Concord Danville El Cerrito Hercules Martinez Moraga Oakley Orinda Pinole	39 47 30 30 36 27 33 24 13b 27 23	C.7.b	Change "Advertising" to "Outreach"	Change "advertising" to "outreach" to make explicit that a variety of methods, including social media, may be used. Delete references to specific subjects. Allow more flexibility.	Water Board staff concurs.	See changes in C.7.b.

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Pleasant Hill San Pablo San Ramon	26 26 33					
CCCWP	40	C.7.b	Eliminate reference to two campaigns and a specific message.	Multiple advertising campaigns split money and dilute effectiveness of message. Single campaign would focus on stormwater awareness, similar to "Spare the Air", "Keep Tahoe Blue" and "Only You Can Prevent Forest Fires.	<i>Our Water, Our World</i> is already considered one advertising campaign. Permittees have other stormwater pollution messages it needs to disseminate to its residents.	Based on comments, Provision C.7.b. has been revamped to allow more flexibility.
Contra Costa County	6	C.7.b	Require a Single Campaign, Chosen By BASMAA	Multiple advertising campaigns split money and dilute effectiveness of message. Require a single campaign, chosen by BASMAA, that is implemented over the permit term. Campaign would focus on stormwater awareness, akin to "Spare the Air" or "Keep Tahoe Blue" and would run for several permit terms.	<i>Our Water, Our World</i> is already considered one advertising campaign. Permittees have other stormwater pollution messages they need to disseminate to their residents. We are not proposing that the Permit require Permittees to participate in a regional advertising campaign, because some Permittees already have successful outreach campaigns that should be continued. The Permit already allows the option for Permittees to elect BASMAA or its countywide program to lead the campaign(s).	
ACCWP	70	C.7.b.i	Advertising Campaigns	Change language to "Permittees shall participate in or contribute to outreach campaigns with the goal of significantly increasing overall awareness of stormwater runoff pollution prevention messages and behavior changes in target	Water Board staff agrees with most of the changes requested and has proposed edits in response.	See changes in C.7.b.i.

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				audience."		
ACCWP	73	C.7.c.i	Delete Media Relations Campaign	Delete: covered under C.7.b.	Media Relations has evolved during the Previous Permit term and now there are other types of free media.	Provision C.7.c. combined with the revised C.7.b.
ACCWP	74	C.7.d.i	Delete Stormwater Point of Contact	Delete. Spill and complaint response covered under C.5.	This requirement is about public education. The point of contact required in Provision C.5.c. – Spills, Dumping, and Complaints Response Program is about providing a central contact point for the public to report spills, dumping, and complaints. It could very well be the same person in some jurisdictions and this Provision already recognizes that.	None.
SMCWPPP	30c	C.7.e	Cut Prescribed Number of Events By One	However, if the current prescribed approach remains, we recommend at a minimum cutting the number of events by at least one across the board.	The total number of required events for each population category is the same or even fewer than what the combined totals for Outreach and Involvement were in the Previous Permit. It is unclear why the total number of events needs to be reduced even further.	None.
SMCWPPP	30a	C.7.e	Combining Outreach and Involvement Increased Number of Events	Provision C.7.e combines outreach and citizen involvement events and would increase the amount of events that most municipalities would have to conduct at a time when local budgets and staff availability for outreach activities are already currently stretched.	The Previous Permit separates out outreach and citizen involvement. This Permit combines them together. The total number of required events for each population category is the same or even fewer than	None.

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					what the combined totals were in the Previous Permit.	
SMCWPPP	29	C.7.c	Allow More Flexibility	Provide an alternative to the proposed six pitches by allowing four pitches coupled with ongoing social media postings. We also recommend noting under reporting (C.7.c.iii) that the success of social media may be documented with available metrics, such as number of likes and shares.	C.7.c. has been deleted and is now included in the revised C.7.b.	See changes in C.7.b.
ACCWP	75	C.7.e.i	Reduce Number of Public Outreach Events	Participate in and/or host events such as fairs, shows, workshops, (e.g., community events, street fairs, and farmers' markets), to reach a broad spectrum of the community with both general and specific stormwater runoff pollution prevention messages. Require planned effort to be included in the C.7.b. Outreach Plan. Minimum Events: Less than 100,000 = 1 100,000 to 250,000 = 2 Greater than 250,000 = 3	The number and categories of public outreach events in the Previous Permit were determined by the Public Outreach and Involvement subcommittee as appropriate. The subcommittee was comprised of Permittee staff who implement public outreach and involvement and also Water Board staff. Different methods of outreach are necessary to reach the varied population. The total number of required events for each population category is the same or even fewer than what the combined totals were in the Previous Permit. The commenter significantly reduces the number of events without providing a basis..	None.
Baykeeper	11	C.7.e	Shouldn't Allow for Regional Outreach Credits	Footnote 1 to Table 7.1 may allow for fewer total (outreach) events simply by virtue of a regional collaborative	This footnote is a continued from the Previous Permit. While the Previous Permit did allow	None.

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				disseminating advertising materials throughout each jurisdiction, thereby providing said jurisdiction with credit for the event, even if the event is held within another jurisdiction. The number of events required should be determined on a Permittee-by-Permittee basis.	Permittees to take individual credit for regional outreach events, there were none. The regional program tends to work on bigger projects, such as advertising and media pitches. The outreach events were either done on the local level or at the county level during the Previous Permit. County-level outreach tends to include the county fair, where residents from all over the county flock.	
SMCWPPP	31	C.7.f	Delete C.7.f and Include Watershed Stewardship Efforts	Eliminate C.7.f as a separate provision and include watershed stewardship collaborative efforts as an option under Provision C.7.e, as described above.	Watershed Stewardship Groups are important parts of numerous communities' stormwater pollution prevention education and involvement efforts. In some communities, public involvement could very well mean promoting and/or supporting a Watershed Stewardship Group's events, such as clean-ups, monitoring, and restoration activities. And only a certain population will be reached by Watershed Stewardship Groups.	
ACCWP	77a	C.7.f.i	Combine with C.7.g.	Combine C.7.g. with C.7.f.		None.
ACCWP	77b	C.7.f. and g.	Combine Involvement and Watershed Stewardship Collaborative Efforts into the New Alternative Plan in C.7.b.	Require planned efforts to for citizen involvement and watershed stewardship to be included in the new C.7.b Outreach Plan. Minimum Events: Less than 100,000 = 1	The number and categories of public involvement events in the Previous Permit were determined by the Public Outreach and Involvement subcommittee as appropriate. The subcommittee was comprised of Permittee staff	None.

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				100,000 to 250,000 = 2 Greater than 250,000 = 3	who implement public outreach and involvement and also Water Board staff. The commenter has not provided a basis for significantly reducing the number of events to the numbers proposed.	
ACCWP	78	C.7.h	Leave Language Concerning School-Age Children Outreach As Is		Comment noted.	None.
ACCWP	76	C.7.f.i	Delete Watershed Stewardship Task	Delete. Covered under C.7.b. and C.7.g	There is no basis to delete this section. Municipal officials are important for buy-in and funding of local stormwater pollution prevention programs.	None.
ACCWP	79	C.7.i	Delete Municipal Official Outreach	Delete section		