

Exhibit 6.I

**Recommendations for Expanding the Orange County
Stormwater Program's Public and Business Education
Outreach Program**

September 1999

FINAL REPORT

Recommendations for Expanding the Orange County Stormwater Program's Public and Business Education Outreach Program

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I. Executive Summary

The keys to a successful long-term, complex, issue-oriented public outreach campaign are: know your audiences; develop messages and outreach activities based on what motivates them; monitor and evaluate success as you go; and redefine messages and target audiences as needed.

The Orange County Stormwater Program (Stormwater Program) is seeking to expand its public outreach campaign to reach a wider audience, and effectively educate and motivate residents and business owners to adopt a variety of simple behavior changes that can help to prevent stormwater pollution.

To succeed, this campaign must be well-planned yet flexible, so that it can stay responsive to— and reflective of— the increasing levels of resident and business owner awareness over the course of the campaign. All campaign outreach components must be implemented in accordance with a “master timeline,” so that they synergistically build upon each other, reaching their targets from a variety of angles. Finally, the County can amplify campaign volume and coverage by creating a long-term campaign “brand name” that sets the tone and creates the impetus for comprehensive, unified countywide delivery of educational messages.

Recommendation #1: Conduct Periodic Surveys to Assess Changes in Public Perceptions

In order to develop a campaign that really “speaks to” and *moves* its audience to adopt behavior changes, the Stormwater Program will need to determine the current levels of knowledge and understanding possessed by Orange County residents. According to the 1994 Orange County Stormwater Pollution Prevention and Flood Awareness Survey, only 31 percent of the residents in Orange County were aware that the sewer system and the storm drain system are distinct from each other.

This means that 69 percent of the Orange County population has not yet learned that the river of waste that flows off of streets— and other impermeable surfaces— into the storm drain system is carried directly to the ocean without benefit of “sewage” treatment. While the recent beach closures (and associated news media coverage) have heightened awareness of pollution in our waterways, the relationship to untreated stormwater runoff has not been made clearly enough. Until this reality sinks in— and each person takes responsibility for stormwater pollution causes and consequences— it is unlikely that a widespread shift in public attitudes and behaviors will occur.

Thus, before the Stormwater Program can launch an expanded campaign, it needs to determine what changes in public perception have occurred since the 1994 survey. PS Enterprises (PSE) therefore strongly recommends that the Stormwater Program prepare for its long-term campaign by conducting a survey to identify and more fully understand the current level of general knowledge held by people in Orange County. Based on this research, the Stormwater Program will be able to formulate appropriate messages, set

realistic goals that will keep the campaign on track, implement cost-effective outreach activities, and evaluate the success of the campaign over time. Furthermore, the Stormwater Program will be able to make appropriate and timely revisions in the messages or the methods of outreach, responding to shifts in public perception.

If the survey results indicate that a large percentage of the population still does not know that urban runoff is discharged to the ocean without treatment— and that the resultant water pollution affects the health of swimmers, sea life, and the local economy— then the immediate goal of the campaign must be to reach more people with this crucial information. On the other hand, if the vast majority of the population in Orange County now recognizes the severity of this problem, then outreach materials can stress how each person can be part of the solution by taking specific yet simple everyday precautions.

This document also suggests survey questions that will enable the Stormwater Program to identify the characteristics of specific population sub-groups that are most likely to need— and heed— the pollution-prevention message. However, because of the expense entailed in conducting such an in-depth survey, PSE has indicated which questions are most essential for obtaining a general gauge of knowledge, attitudes and behaviors of residents about stormwater pollution prevention.

PSE further recommends that the Stormwater Program conduct a second survey— midway in the long-term campaign— to determine whether the goals of the program are being met. This survey data will enable the Stormwater Program to fine-tune its outreach— or alter its direction— in accordance with shifts in public awareness and interest. A final survey at campaign's end will reveal how effectively the campaign achieved the Stormwater Program's goals and will provide insight as to what the next steps should be to achieve an even broader adoption of best management practices (BMPs).

In addition to periodic countywide public opinion surveys, PSE encourages the Stormwater Program to use a variety of measurement tools to evaluate the effectiveness of outreach materials – in the design phase – and outreach activities as they are being conducted. We discuss various assessment tools, including focus groups, intercept interviews, and questionnaires and we provide recommendations for obtaining immediate responses from a particular outreach effort.

Recommendation #2: Segment the Audience to Tailor the Message and Outreach

Given that industrial inputs to the storm drain system are highly regulated, the general audiences that the County will want to reach— and that this document describes— are residents and businesses.

General Population

The residential population of Orange County includes people with young children, homeowners, pet owners, consumers of hazardous materials (such as fertilizers, pesticides, paints, etc.) and school kids. By developing outreach materials specifically related to activities or products favored by these subgroups, the behavior changes that the Stormwater Program is requesting will appear relatively easy to adopt and integrate into their daily lives.

Residents can be reached through a variety of means, such as radio, print, and billboard advertisements; presentations at community meetings; the placement of materials at public counters; the news media; radio public service announcements; and school education programs that turn children into their parents' "teachers." Colorful, non-traditional formats for presenting educational materials will make them more visible amid the clutter of literature every resident receives and discards on a regular basis.

Many residents have grown very familiar with a variety of environmental messages and have made BMPs such as recycling, and the proper disposal of household hazardous waste, a regular part of their cleaning routines. The Stormwater Program can build upon this ingrained impulse to "do the right thing" by incorporating messages from these educational programs into its outreach materials. Most often, environmental messages regarding disposal of materials directly translate to the best management practices for stormwater pollution prevention.

Business Audiences

Orange County's business audience includes owners, managers, employees, and customers of industries and businesses of all sizes. It is imperative that all of these people understand the penalties of polluting behaviors. However, the Stormwater Program's campaign will be more effective—and compliance more readily achieved—if the Stormwater Program focuses on the "carrot" rather than the "stick," and if the County is perceived as a partner/facilitator rather than as an enforcer/punisher.

The best incentives/rewards that the Stormwater Program can offer to compliant businesses is publicity. Through the Stormwater Program's newsletters, media releases, and certifications—as well as through formal recognition from the County Board of Supervisors and/or city councils—the Program can "promote" to the public those companies that employ environmentally sound practices in all of their business activities. And by educating the public to favor such companies, the Stormwater Program can create a popular force that uses monetary incentives to convince companies to follow the recommended BMPs.

A second essential strategy that will enhance compliance is to include representatives from each of the audience categories in the development stage of the campaign to help refine the message and outreach strategies. Not only will this create early "buy-in" from business audiences, but the Stormwater Program will also gain a far better understanding of specific issues involved and will thus be able to create a more workable set of BMPs.

With the help of these groups, the Stormwater Program will also discover the most effective ways to communicate the BMPs to different business operators.

The Stormwater Program can reach large and/or established industry and business audiences through their respective associations' newsletters and meetings— as well as through their customers. But mobile industries— like auto detailers, construction companies, surface cleaners, and carpet cleaners— can be a challenge to reach with educational messages. This is because of the diversity of the industries, their transient operators, cultural and educational differences, language barriers, and the additional effort and expense that may be required for some of these industries to implement the BMPs.

The people most able to persuade mobile service providers to utilize environmentally friendly procedures in their operations are their customers; for service users have direct contact with members of the mobile industries and will be held liable for pollution that occurs on their property. Thus, educating the public, publicizing compliant businesses, and working with mobile business owners— along with their customers and suppliers— to develop specific, realistic BMPs as well as effective outreach materials, are the three primary strategies for creating compliance in this group of business owners.

Recommendation #3: Create a Guidebook to Communicate Purpose and Structure for Outreach Campaign

As the lead entity for public education under the Stormwater Program, the County of Orange has a number of responsibilities. It must develop, implement, and measure an effective outreach campaign, and provide the cities with opportunities to implement this campaign at a local level, so that the widest possible audience can be reached in the shortest possible time through the most efficient and economic means.

To achieve this ambitious objective, PSE recommends that the Stormwater Program create a comprehensive guidebook that describes the rationale behind— and the details of— every element of the campaign, from its unified look to its ultimate goals. The Stormwater Program's responsibilities, and the opportunities for cities to participate, should also be specified along with target audiences, timelines for implementation, and the means to measure the effectiveness of each activity detailed in the guidebook. The guidebook allows all cities to follow the long-term campaign and to anticipate the development of outreach elements by the County of Orange. This document provides a prototype for such a guidebook, and details a number of specific outreach activities directed toward the general public and business audiences.

Recommendation #4: Use Existing Avenues to Reach Residents and Businesses Most Cost Effectively

One of the most cost-effective ways for the Stormwater Program to deliver educational messages to Orange County residents and businesses is through existing distribution avenues. A vast number of networks currently feed information to the public and within communities. These outlets— including neighborhood block clubs, libraries, community

events, health inspection visits to businesses, animal registration mailings, and business associations— are identified in this document.

In most cases, these outlets respond positively to requests for dissemination of educational information, through inclusion in mailings or newsletters, by placement at public desks, and/or by handing out materials or hosting speakers at meetings. This broad-based approach will reach a wide audience and use minimal Stormwater Program resources.

Conclusion

The health and well being of the Orange County population is critical to the economic success of the region. Effective stormwater public education— that motivates the population to change its behavior and reduce pollution of local waterways— is an essential step in maintaining the environmental quality of life for all residents.

PS Enterprises commends the Orange County Stormwater Program for seeking to create a strategic and cost-effective long-term public and business education campaign that stays ahead of the regulatory process. It is our sincere belief that the document we have prepared will serve as an integral planning tool for the Stormwater Program to design and implement a model program that will dramatically influence the behavior of Orange County residents and businesses, resulting in a significant reduction in stormwater pollution.

II. What We Know

Requirements

The Orange County Stormwater Program (Stormwater Program) finds itself in a fortuitous position, compared with most other entities required to create and implement stormwater public education campaigns. The Stormwater Program is not "under the gun" of a court order; thus, it has much more latitude to create a campaign that meets the specific needs of the region and the Stormwater Program's internal goals.

The Stormwater Program is the combined force of the County of Orange and all cities within Orange County— united to meet the requirements of three documents: the *Drainage Area Management Plan*; *National Pollutant Discharge Elimination System Permits*; and the *Report of Waste Discharge*. These documents govern what stormwater public outreach efforts the Stormwater Program will implement.

As the lead entity for public education under the Stormwater Program, the County of Orange will prepare and submit public outreach goals for inclusion in these reports, on behalf of the Stormwater Program. An integrated long-term (at least five year) public outreach strategy is critical to ensure synergy among all outreach efforts.

The Stormwater Program must fulfill requirements both broad and specific. PS Enterprises (PSE) has analyzed the public education sections of the documents listed above and has determined that, as the lead entity for public education under the Stormwater Program, the County of Orange is committed to:

- Coordinating a countywide public awareness campaign;
- Informing the community about the origins and causes of non-point source pollution and its significant contribution to water quality impairment;
- Preparing and distributing a stormwater pollution brochure and poster;
- Identifying and promoting behavioral changes that will contribute to controlling pollutants at the source;
- Participating in joint outreach with other programs including, but not limited to, other municipal stormwater programs to ensure that the public is presented a consistent stormwater pollution prevention message;
- Coordinating activities with other public information programs, such as water districts, sanitation districts, fire departments and community and environmental groups;
- Creating a message that includes more recognizable environmental issues, such as recycling, proper disposal of chemicals, reducing the waste of water, littering, pollution of coastal areas, etc.;
- Developing and disseminating Best Management Practices (BMPs) guidelines for specified activities not otherwise regulated by any agency (mobile pavement pressure washing, mobile vehicle maintenance, carpet cleaners, restaurant floor mat cleaning, commercial landscape maintenance, pavement cutting for utilities, etc.);

- Developing public education materials to encourage the public to report illegal dumping from residential, industrial, construction and commercial sites into public streets, storm drains and other water bodies;
- Incorporating stormwater pollution features into Orange County Fair booths, community fair booths, and speaking engagements; and,
- Continuing the household hazardous waste outreach program.

This PS Enterprises report reviews the processes necessary to prepare for and meet these requirements and, in many cases, includes recommendations for outreach activities.

Outreach to Date

The County of Orange has a significant household hazardous waste collection program and a used oil recycling outreach program, both of which deliver messages that directly affect the volume of pollutants that end up in the storm drain system.

The educational component of the Orange County Stormwater Program is in its infancy. The Stormwater Program has developed a brochure and implemented many outreach activities and, in some cases, individual cities have developed their own stormwater outreach materials. Past Stormwater Program outreach efforts include:

- Distribution of Public Service Announcements (PSAs) to local cable and public television stations and movie theaters;
- Distribution of three brochures: *The Ocean Begins at Your Front Door*, *Preventing Sea Sickness* and *Do You Know Where the Water in Your Storm Drain Goes?* to the general public through interest groups and libraries;
- Production of a 30-minute educational video, “The Ocean Begins at Our Front Door”;
- Staffing booths at community outreach events, including the Orange County Fair, the Earth Day Fair, and the Beach Clean-Up Days;
- Coordination of clean-up events in partnership with the Harbors, Beaches and Parks Function;
- Placement of stormwater related articles in the County’s *Floodline* newsletter;
- Presentations to interest groups;
- Presentations on the stormwater mandate and the Stormwater Program at business workshops and seminars;
- Participation in the Statewide “Pollution Prevention Week”;
- Development and distribution of BMP guidelines to automotive service centers;
- A Hotline for receiving questions and requests for materials; and,
- Conducting a Stormwater Pollution Prevention and Flood Awareness Public Survey as part of the 1994 Orange County Annual Survey.

(A review of these outreach efforts will be included in Section V, along with recommendations for future activities.)

While the Stormwater Program’s outreach efforts to date have most likely increased public awareness of stormwater pollution, they are only discrete elements. The Stormwater Program must plan a comprehensive outreach campaign to ensure its

message is appropriate, consistent, and delivered in the most cost-effective manner. We will suggest, among other strategies, that the Stormwater Program develop its own "brand name" that will help deliver an integrated message to its residents.

This document builds upon the Stormwater Program's public outreach efforts to date, providing an approach to a long-term cost-effective strategy for a targeted stormwater public education campaign, with easy-to-implement elements.

III. Measuring Effectiveness

This section will review research to date and recommend effective methods, frequencies, survey questions, etc. that could be used to evaluate the success of the Stormwater Program's public and business education strategy.

We will:

- 1) Review the results and methodology of the 1994 Orange County Stormwater Pollution Prevention and Flood Awareness Survey conducted by Mark Baldassare and Cheryl Katz of the University of California, Irvine. (Note: the information gathered in the survey regarding flood awareness, while somewhat relevant, will not be considered or evaluated here.)
- 2) Offer an overview of the options/tools for measuring effectiveness for a countywide campaign, as well as specific activities.
- 3) Deliver recommendations for future measurements, including methods, frequencies, and questions.

Review of the Results and Methodology of the 1994 Survey

Results

The Stormwater Pollution Prevention and Flood Awareness Survey conducted as part of the 1994 Orange County Annual Survey offers a good general baseline of Orange County residents' awareness of general stormwater and flood issues. However, due to its brevity and general nature, the survey does not give as clear a picture as might be wished of residents' awareness of the problem of stormwater pollution or the effectiveness of outreach efforts in Orange County.

For example, some of the information gathered about whether or not Orange County residents have seen various stormwater outreach vehicles (i.e. PSAs, brochures, curb stenciling) may not necessarily be a fair judgement of the effectiveness or ineffectiveness of those message vehicles, or the overall outreach effort's success or failure.

The finding that knowledge about stormwater pollution tends to increase with exposure to public service announcements and storm drain stenciling points to the positive effect that certain educational vehicles can have on public awareness, although exposure to the brochure did not necessarily accomplish the same result.

The demographic patterns revealed by the survey— older, better-educated, higher-income Anglo and South County residents are more knowledgeable about stormwater pollution prevention than young, non-Anglo, lower-educated and lower-income earning residents— are not as revealing as they may seem. It would be helpful to further

distinguish the awareness levels among demographics in order to better define target audiences and develop more suitable messages and/or educational vehicles. This approach will be discussed later in this section.

Although it is expected that the next public survey will indicate that public knowledge has increased, the 1994 survey is no longer relevant enough to use as a base for evaluating the effectiveness of the Stormwater Program's outreach to date, nor for planning the next steps for an outreach campaign. The survey's conclusion that nearly half of Orange County residents (44 percent) believe that the storm drain system and the sewer system are the same indicates a need for an increase in public knowledge of the difference before the Stormwater Program can expect widespread behavior change. PSE's experience in stormwater education has taught us that people must first make the distinction. Then they can be taught how to change their behaviors.

The next public survey will have one of two outcomes:

1. A minimal increase in public knowledge, which will require additional intensive focus on storm drain system-related messages; or
2. A significant increase in public awareness, which will facilitate a shift into messages that stimulate a change of behavior toward storm drains.

If the former occurs, we expect that a follow-up survey 2 ½ years later, after residents have received the basic "there's a difference" message, will indicate a shift into the latter. We provide a more detailed analysis of appropriate message shifts in Section IV.

Methodology

The methods used by Baldassare and Katz to conduct and analyze the 1994 Orange County Annual Survey were certainly in line with public opinion survey methodologies. Because the stormwater and flood awareness survey was only a portion of a much larger survey, the number of questions regarding stormwater awareness was minimal. Therefore, the information gathered regarding stormwater awareness, etc. is basic background information, which indicated general trends versus more quantifiable results.

In addition, the specific questions used in the survey focused solely on the level of knowledge about the stormwater system and experience with outreach materials. A new survey can be expanded to both gauge residents' level of knowledge, and to review polluting behaviors and cross-reference those with demographics to define target audiences. While this technique means more work and is more expensive, it will position the Stormwater Program for a much more effective outreach campaign by allowing funds to be directed to areas that can have the most effect. (Samples of questions used in this technique are included in the Recommendations section below.)

Options/Tools for Measuring Effectiveness

The California Best Management Practices (BMP) Handbook defines "non-conventional monitoring" as the enumeration of some quantity other than water quality data to infer pollution reduction or water quality improvement. Examples cited include surveys of public opinion to demonstrate increasing environmental awareness, monitoring of the

amount of used oil being delivered to household hazardous waste collection centers, etc.¹ This section reviews many options for “non-conventional monitoring” tools to ensure and measure the success of a public education campaign.

The following tools can be adapted to measure the effectiveness of an entire campaign or specific outreach activities, based on the frequency of delivery and the emphasis. It is important to note that most tools can be used both before and after outreach. By using many of these techniques before, the specific outreach strategy and target audiences can be defined, and messages can be tailored to most effectively reach the target audiences. Using these techniques after an outreach campaign/activity can provide data that determines how effectively the campaign or activity increased knowledge and/or changed behavior.

The keys to a successful long-term, complex issue-oriented public outreach campaign are:

1. Knowing your audience;
2. Developing your messages and outreach activities based on motivators;
3. Monitoring and evaluating success as you go; and,
4. Refining messages and/or the target audience(s) as needed.

Surveys

Public opinion surveys are a widely recognized tool for measuring the quantitative effectiveness of a public outreach campaign, such as a countywide stormwater education campaign. Their effectiveness as a measurement tool, however, varies greatly depending on the frequency of their use, the questions asked, how those questions are framed, and how they compare to “benchmark” data.

Surveys before, during and after a five-year campaign will be critical for developing and maintaining an effective public outreach campaign. However, if the survey tool for each is not almost identical, data collected cannot be evaluated effectively, and must be considered “untrustworthy.” To this end, the specific questions used in the survey must be designed based on the goals for all five years of the campaign.

Obviously, public opinion surveys can be conducted in a variety of ways, but the most efficient, cost-effective, statistically reliable data collection method is a telephone survey.

Other Measurement Tools

A variety of other tools are available to measure the effectiveness of the overall campaign and/or specific campaign activities.

¹ Drainage Area Management Plan, Section 5.2

Focus Groups

While focus groups are not a great tool for measuring effectiveness, they are an excellent tool for effective campaign or activity planning. As mentioned previously, gathering data before developing outreach efforts can make the outreach exponentially more effective. Because information regarding the stormwater system and behavior changes is relatively complex, how such information is delivered becomes very important. The right data will help shape the message/materials/activity/campaign to ensure the information delivered makes sense and makes the public care about the message. The data required for this development process includes: the demographics of an identified target audience (including language preferences), what motivates the audience, and the issue-related vocabulary that most effectively delivers the message.

Focus groups provide an excellent forum for collecting this information. Focus groups are generally 1-4 hour group “interviews” (participants are paid for their time). The group setting allows the interview to turn into a discussion, which provides more honest and candid information regarding public perception of the issue at hand. These sessions are usually planned by a research specialist and run by a professional moderator, to guide discussion and ensure the most effective use of the participants' time. These sessions are often videotaped or conducted in a facility with a one-way mirror so the client can watch the participants interact. To ensure the information collected is valid on a regional level, it is often necessary to conduct two to four focus groups. Conducting multiple focus groups also allows for language-specific sessions.

Focus groups can help the Stormwater Program develop an overall campaign or outreach activities tied to pollutant-related behaviors, i.e. illegal dumping, or pesticide application. This research technique includes a general discussion of the issue and a review of proposed materials/messages/themes with responses from participants.

Intercept Interviews

This alternative survey tool is usually conducted in a public area, such as a shopping mall. Survey participants are selected based on specific demographics, and are simply approached in a public place and asked for a few moments of their time. Most intercept interviews are actually conducted in a separate room adjacent to the public space and interviewees are given \$5-10 for participating.

While these face-to-face interviews are often more expensive than a telephone public opinion survey, they provide a great opportunity to test sample outreach materials. For example, if the Stormwater Program is creating a print advertisement and wants to make sure the public is getting the ad's key message, it can be presented in an intercept interview along with several other print advertisements (for other items/campaigns). The interviewer then asks questions to determine how memorable the advertisement is— how well it cut through the clutter of competing ads— and how well it is received.

While focus groups are appropriate for researching approaches to a campaign strategy, intercept interviews are most effective for soliciting comment on a selected outreach strategy. However, one-on-one intercepts do not provide the benefit of a group discussion.

Water Quality Measurement

Stormwater quality testing can help indicate a change in behavior (such as a reduction in the improper disposal of a pollutant) resulting from a public education outreach program. However, because of the inherent variability of stormwater quality— based on the diversity of activities/conditions that affect water quality, including sewage leakage and weather conditions— any data collection must be extensive, to provide statistic validity.

If the Stormwater Program implements a small, area-specific targeted outreach campaign responding to the detected presence of a select pollutant, water quality measurement could be used to evaluate the effectiveness of these outreach efforts. However, to obtain statistically significant water data, a large number of samples would need to be collected many times a day over a period before, during and after the outreach campaign.

When using water quality as a measurement tool for evaluating a regional multi-year campaign, a large number of samples must be collected over a number of years before, during, and after the campaign— to obtain statistically significant water quality data.

Activity-specific Goals/Measurement

Because of the length of time between public surveys, it is important to build measurement tools into every outreach effort. This method not only provides specific feedback for each activity rather than a general set of results on a three-year basis, it also provides almost immediate justification for continuation of an activity. Please note, however, that while this type of measurement usually has no additional cost, it does not provide statistically valid data regarding a shift in public perception/knowledge. Examples of this type of measurement process include:

- *Measuring shifts in quantity of calls to the hotline or Website hits.* This is an excellent measurement tool for an outreach activity designed to ask the public to report information to the hotline/Website or to encourage the public to use the hotline/Website for obtaining additional information. Tracking the number of calls/hits provides quantitative data about the effectiveness of the related activity.
- *Measuring a direct change in behavior by visual indicators.* This is often not an option, due to the “invisible” nature of many pollutants, such as automotive fluids and pesticides. However, for a targeted outreach activity such as illegal dumping or trash abatement, it may be possible to team up with catch basin cleaning crews to track a reduction in the amount of waste/trash ending up in catch basins and gauge the outreach activity’s effectiveness.
- *Telephone surveys.* Full-scale public opinion telephone surveys are costly. However, smaller targeted telephone surveys can provide valuable information regarding a particular target audience. These are helpful in developing outreach activities for specific industries, community issues, or other targeted sub-groups.
- *Distribution and collection of questionnaires.* Questionnaires given out after presentations can measure participants’ retention of the information provided during

the presentation as well as comment on the campaign in general. A questionnaire could also be used on a Website. The agency distributing this questionnaire may offer some incentive (i.e. participants will be sent campaign magnets) to ensure that participants complete the survey.

- *News clippings.* Measuring of the amount of media coverage (column inches, minutes of air time) in an area provides anecdotal information about the effectiveness of outreach efforts if media relations is one of the active components of the activity.

In conclusion, the most important aspect of designing an effective and useful system of evaluation and measurement is the creation of measurable goals before the onset of any campaign/activity. (The approach for setting goals will be addressed in Section IV.) This preparation is the only means through which one can prove the ultimate success of outreach efforts and, in turn, the return on investment of public funds.

Recommendations for Future Measurements

A more extensive series of public opinion surveys, designed solely for use in conjunction with the Stormwater Program's five-year public outreach campaign, will provide data to define baseline awareness (setting benchmarks) and target audiences. It will also enable the Stormwater Program to measure the campaign's effectiveness in mid-stream (at the 2½ year mark), and better quantify and evaluate results at the end of the five-year campaign.

Each of the three surveys (before, during and after) should have a consistent set of questions to measure overall awareness. The surveys conducted at the halfway point and at the end of the campaign should also contain sufficient questions to help determine whether the campaign (or a particular outreach activity) is effective, but also how and why it is effective. These findings will help the Stormwater Program validate any necessary changes during the campaign and/or to make changes for a subsequent campaign.

The following are recommendations for questions to be included in the next series of public surveys to help identify audiences, messages, and even the vehicles for message delivery. While these are recommendations, please be aware that research specialists usually write questions using specific language to avoid confusion or leading questions. To this end, most of the questions below should include answer options such as “strongly agree, agree, no comment, disagree, strongly disagree” or a set of possible answers related to the specific question.

PS Enterprises recognizes that public opinion surveys increase in cost based on the number of questions asked. The following list covers the ideal information to be collected in a stormwater public education survey. This list should be modified to reflect the available budget and the Stormwater Program's goals for a public education campaign. Specific recommendations for ranking these questions for use in a shorter survey are included below.

To gain a better understanding of the general public's current level of awareness, PSE recommends including (not necessarily in this order):

The first three questions in the 1994 survey (because a baseline exists):

- 1) Agree or disagree: The storm drain system and the sewer system are part of the same underground system.
- 2) Agree or disagree: The water and other substances that flow through the storm drain system are tested and filtered to remove wastes before they are discharged from the system.
- 3) Agree or disagree: It is illegal for anyone to throw, dispose of or allow anything other than rainwater into the storm drains.
- 4) A question that asks if they know the purpose of the storm drain system.
- 5) A question that asks if they know where water from storm drains ends up.
- 6) A question that determines their level of concern about generic problems facing Orange County, such as air pollution, traffic congestion, crime, the quality of education, racial tensions, water supply and quality, unemployment, etc.
- 7) A question that asks if they have ever heard of the problem of stormwater pollution and, if yes, what they heard (in a few words).
- 8) A subsequent question that asks where they heard of stormwater pollution. (The possible answers for this question should include brochure, a friend, radio announcements, television announcements, curb stenciling, news articles, radio/television news stories (local and national), community events, etc.)
- 9) A question that asks if they think the waters of Newport Bay and along the beaches of Orange County are polluted.

To gain a better picture of the general public's current level of understanding, PSE recommends including (not necessarily in this order):

- 10) A subsequent question that asks, assuming there is a pollution problem in Newport Bay and along Orange County's coast, what the major contributors are, such as: industry, littering on streets, construction, boaters, etc.
- 11) A question that asks what they think are the possible pollutants.
- 12) A question that asks their level of concern for the following consequences of stormwater pollution: harmful to fish and marine wildlife; a health problem for humans who swim or bathe in the water; a health problem for surfers only; a health problem because fish is unsafe to eat; clogged catch basins cause

neighborhood flooding; clogged catch basins cause foul odors; clogged catch basins attract vermin; and clogged catch basins are unsightly.

- 13) A question that asks their level of concern about the following items that may end up in the storm drain system, such as paint, leaves, litter, car wash runoff, motor oil, swimming pool water, pet waste, etc.

To gain information that can be cross-referenced with demographics to determine target audiences and motivators for behavior change, PSE recommends including:

- 14) Standard and non-standard demographic questioning including:

- Age range
- Ethnic group
- Level of education
- Preferred language for written information
- Household income range
- Gender
- Marital status
- Years as an Orange County resident
- What type of residence they live in (single-family house/condo/apartment/etc.)
- Number of people in household
- Number of children and age ranges
- Zip code

- 15) A question that asks how frequently they go to the beach or the ocean and in what activities they participate at the beach.

- 16) A question addressing several general lifestyle attitudes: health, exercise, environmental consciousness, community participation, financial pressure, etc.

- 17) A question that asks where the respondent gets their information about current events and issues affecting Orange County: local TV news (list of stations); local newspapers (list of papers); radio programs (list of local radio stations); local magazines or periodicals (list of magazines/periodicals); the Internet (prompt for sites).

- 18) A question that asks if the household has: an automobile (how many), a dog/cat/horse (how many), a garden, a lawn, or an abundance of wild animals in its vicinity (what kind).

- 19) As applicable, a question that asks if they perform the following tasks at home: auto repair (oil change), auto washing, gardening, application of fertilizers and pesticides, lawn mowing.

- 20) A subsequent series of questions regarding the interviewees' water quality related behaviors for these activities.
- 21) A question regarding their willingness to change polluting behaviors if they knew they were polluting.
- 22) A question that asks them what would motivate them to correct their polluting behavior.
- 23) A question regarding their willingness to stop someone else from polluting.

While this list covers all areas that would support the development of an effective campaign, we understand that a 23-question survey will be costly. To that end, we have narrowed this list for use in smaller surveys (5 or 10 core questions). A five-question survey should include questions 1, 2, 5, 10, and 12. A ten-question survey should include questions 1, 2, 3, 5, 6, 7, 8, 10, 12, and 13. These core questions will provide a good understanding (baseline) of current public awareness levels, which will allow for appropriate message development and for measurement of shifts in knowledge base.

Most of the questions we have dropped seek audience and behavior specific information (questions 14 through 23). Those questions are particularly helpful for defining the specific segment of the general public audience that is most likely to change its behavior and for measuring changes in behavior over time. Given the Stormwater Program's current goal of delivering a broad-based public outreach campaign at a reasonable cost, we feel the latter questions are not as crucial.

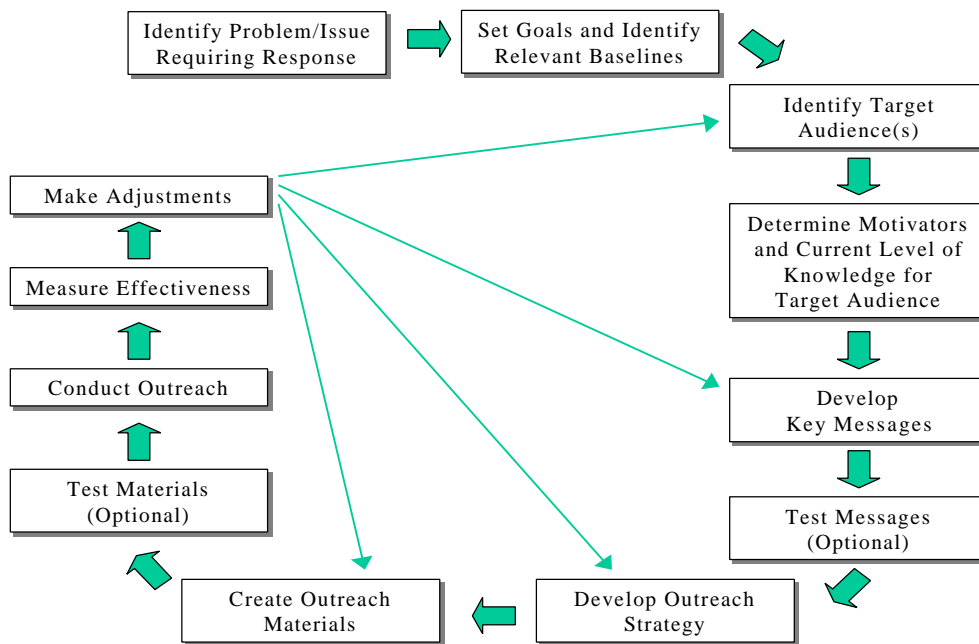
Finally, a public survey is a limited tool, if used alone, for gauging the success of discrete tactics, because the length of time between surveys means it only measures the success of a campaign as a whole. Therefore, in addition to a public survey, PSE strongly recommends the incorporation of at least one activity-specific goal/measurement for each activity within the campaign. As noted above, this strategy will provide timely feedback specific to each outreach effort.

IV. Building a Campaign

As mentioned above, base research is fundamental to building an effective public education campaign. We recommend the following approach to building a campaign, but note that this is a flexible tool, adaptable to accommodate the results of the Stormwater Program's next public survey.

The graphic below presents a universal formula for developing and implementing outreach campaigns. This formula can be applied for a multi-year comprehensive outreach program or a short targeted outreach activity. Not only does this formula illustrate the step-by-step planning process, it also serves as a tool for quickly identifying the current stage of development for any program/activity. The following sections describe the stages represented here.

Universal Formula for an Outreach Campaign



Develop Goals

While research provides quantitative baselines from which to launch campaigns, campaign goals based on the research data will keep a campaign on track. For Orange County, where requirements are based on goals set by the Stormwater Program, rather than by court order, well-planned goals are as valuable as research results in evaluating success.

All goals must be realistic and they must be based on information that can actually be collected. The more current data available for inclusion in goals the better, as this will provide an almost quantifiable measurement of effectiveness.

PSE recommends that the Stormwater Program's campaign goals address both expected achievements and more general regional improvements. In addition, as mentioned in the Activity-specific Goals/ Measurement segment above, it is important to develop goals for each outreach activity before implementing the activity, as these goals become a tool to measure the success of each outreach activity.

We suggest these approaches for determining goals:

Sample general goals for the campaign:

- Increase awareness of the storm drain system and stormwater pollution among the general public.
- Increase awareness of polluting behaviors and motivate the public to shift to pollution preventing behaviors.
- Implement a cost-effective outreach campaign by leveraging funds with other public information outreach programs in the region.

Sample general goal for a targeted activity:

- Develop BMP materials and conduct a targeted outreach activity for mobile auto detailers.
- Develop BMP materials and conduct a targeted outreach activity to reduce nitrogen and phosphorous compounds reaching a targeted water body (e.g. Newport Bay) from identified sources. (Obviously, this type of activity would need to be based on specific scientific data that identifies pollutants and their possible sources.)

Sample specific goal for an increase in public knowledge:

- Decrease the percentage of the population that agrees with the statement "The storm drain system and the sewer system are part of the same underground system" from XX percent to XX percent.

Sample specific goal for a targeted activity:

- Increase the number of illegal dumping reports to the Hotline by XX percent.

Identify Target Audiences

To effectively build and implement a long-term outreach campaign, the Stormwater Program must identify target audiences based on regional stormwater quality issues and public opinion survey results. Clarifying target audiences will allow the Stormwater Program to develop messages and outreach activities that incorporate the behaviors and motivators specific to each audience.

As discussed in Section III and based on available funds for strategy development, the Stormwater Program may elect to conduct an extensive initial public survey that not only determines the level of public knowledge regarding stormwater pollution, but also begins to delineate different demographic sub-populations based on their polluting behaviors. This research technique would identify those most likely to pollute, the type of pollution caused by different sub-populations, and those most likely to change their behavior. While this approach would be most effective in clearly identifying the most beneficial populations to target with outreach, it is significantly more expensive.

If the Stormwater Program chooses not to pursue that research approach, an alternative option is to select audiences based on obvious sub-group characteristics. The two main audience categories are the general public and businesses. This section offers a brief description of all sub-groups (identified based on their specific influence on stormwater pollution prevention) and possible avenues for reaching each sub-group. PSE recommends selecting target audiences at the sub-group level before developing outreach activities. It will be important to review the languages in which to best reach these audiences before preparing outreach materials.

Furthermore, if the Stormwater Program chooses this less-costly approach, it will be beneficial to incorporate some of the other research tools described earlier to learn more about the target audiences and prepare the most effective outreach activities.

While the following information is a comprehensive set of possible sub-groups, it should be used as a series of suggestions rather than a checklist.

General Public/Residents

Outreach to this broad audience will be effective if used as a support mechanism for targeted outreach efforts. Such a general approach would also be applicable if the Stormwater Program seeks to increase the general public's knowledge of the storm drain system. (If the Stormwater Program seeks specific behavior changes, outreach to an audience this broadly defined is not the most cost-effective.) Also, as a support mechanism, this broad approach will reach the neighbors of the pet owners, homeowners, personal auto maintainers, etc. Community "watchdogs" exist in every neighborhood, and they will help reinforce messages delivered to specific audiences.

Residents can be reached through advertisements (radio, print, and billboards), presentations at community/neighborhood meetings, canvassing to talk to residents, placement of materials at public counters (libraries, city/county agency desks, community centers), and radio and television PSAs. These options are discussed in more detail in Section V.

Residents with Children

This audience provides a bit more focus than the General Public group, in that these residents are more likely to respond to messages regarding the possible effects of stormwater pollution on children. In addition, they are more accessible because they have children who can bring the message home. The school system is an excellent avenue for reaching these residents, either by creating educational activities for children who, in turn, bring messages home to their parents, or for direct distribution of materials to students to take home to their parents.

Homeowners

This audience provides a bit more focus than the General Public group, in that homeowners are responsible for maintaining their homes and yards. This group is the most logical audience for messages regarding home repair (painting, etc.) and yard care (fertilizer, pesticide, and green waste).

Pet Owners

All pets in the county should be registered with the Orange County Health Care Agency. This provides a great opportunity to strategically target pet owners through the mail. The Stormwater Program can collaborate with pet supply stores to provide space for point-of-purchase displays, or to distribute flyers to customers. In addition, the Stormwater Program should add pet-related events to the list of events in which it participates.

Product-related Audiences

A significant amount of stormwater pollution is caused by specific products such as fertilizers, pesticides, paint, motor oil, other automotive fluids, and automotive cleansers. Two cost-effective options exist for targeting the users of these products: partnerships with product suppliers for specific product labeling (neck-hangers, tear sheets) regarding the safe use/disposal of the product; or partnerships with the automotive and home-repair stores that sell these products to place point-of-purchase displays.

School Children

As mentioned earlier, school children are an effective mechanism for reaching the residential community. Not only do they "police their parents" when they learn about pollution prevention, these young people are the future of Orange County. Their purchasing decisions will have a huge effect in only a few years. Their future decisions as homeowners will have fewer harmful effects if they are given a solid foundation of environmental stewardship.

Obviously, this sub-group can be reached through the schools. How they are reached, however, requires more planning. Simply distributing curricula to schools is not very effective, because teachers are already overwhelmed by the amount of information they need to teach students. A more effective approach might include developing a school activity that the Stormwater Program brings to each school, or partnering with an existing school activity such as the Municipal Water District's "Ricky the Raindrop." The Stormwater Program could also offer workshops for teachers, teaching them how to most

effectively incorporate stormwater-related environmental messages into their lesson plans.

Businesses

As with the general public, outreach efforts to the business community will be most cost-effective if they are specific to sub-groups/industries. Delivery of general messages (such as promotion of the county and city water quality ordinances) will be effective only as a support mechanism for industry-specific outreach activities.

The business sub-groups have sub-categories of their own. Not only must different industries be treated as different target audiences, but most businesses also have different levels of employees who need to understand stormwater pollution prevention. In addition, all businesses have customers who can influence the implementation of BMPs. The sub-groups are described below.

Industries

There are two main avenues for identifying target industries for stormwater education outreach. The identification should be based on the Stormwater Program's internal goals for business outreach. The first approach includes reviewing the major industry categories within Orange County, and cross-referencing this with the industries most often visited through the County and cities fire and health inspection programs. This cross-referencing for target industry selection is important because the most cost-effective general outreach campaign to businesses is probably the distribution of materials and BMP instructions through existing inspection programs.

The second approach involves focusing business outreach on the industries that have been significant and consistent contributors to the degradation of water quality in Orange County. One such problem industry, already identified by the Stormwater Program, is the collective mobile businesses. Identifying target audiences based on the impact on water quality is usually more complicated, but can be made through interviews with stormwater staff who spend time responding to stormwater pollution incidents throughout Orange County. This focused approach often results in area-specific outreach, as many polluting industries are clustered in the same neighborhood.

If the Stormwater Program cannot collaborate with inspection programs for business outreach, or wishes to supplement this outreach effort, many options exist. Many industries have business associations that provide an excellent avenue for reaching industry members, either through placing articles in newsletters, or presentations at association meetings. These outreach avenues are discussed in further detail in Section V.

Mobile industries are a distinct sub-group, addressed in Section VI.

Finally, PSE recommends conducting focus groups or telephone surveys with members of a target industry to discover how to reach that industry most effectively, and to discover appropriate motivators for BMP implementation.

Business Owners/Managers/Employees

Business owners are ultimately responsible for pollution leaving their properties and/or facilities. However, managers are responsible for the behavior of employees, and employees must understand BMP requirements so they can incorporate them into their daily activities. This information transfer is not always made in an employee training program and must be supplemented by outreach to all levels. For all outreach to the industries discussed above, PSE recommends supplementing any materials sent to business owners and managers with a simpler translation of the BMPs that can be easily understood by employees at most education levels.

Customers

Customers can often be an important target audience for business outreach. Given the sheer number of businesses that provide the same service in any region, environmentally responsible businesses may draw additional customers from among residents with an environmental consciousness. Customers of these businesses should be targeted for outreach.

Create a Unified Campaign

As with any campaign, creating an easily identifiable “brand” for the Stormwater Program’s outreach campaign is essential. This brand does not need to be educational, merely memorable and flexible. It should include a program name that serves as a graphic logo and sets the tone for all campaign outreach.

A single brand "sponsoring" all outreach activities and on all campaign materials will help the public understand that all the information it is receiving is interrelated. The Stormwater Program can increase the number of audience "impressions" if it is able to encourage the use of this brand in city-sponsored outreach activities/materials and by other internal environmental education programs (such as household hazardous waste and used oil). Unfortunately, the vast number of public education programs— delivered at the local, regional, state and federal levels, and by non-profit and for-profit corporations— each provide a slightly different message, often confusing the public. Linking regional and local efforts through a brand identity will help to build regional momentum for environmental stewardship.

The County of Los Angeles has created such a brand, Project Pollution Prevention, recommended for use in all County and city environmental outreach programs. The Orange County Stormwater Program may explore the possibility of partnering with Los Angeles to use this brand for regional unity. Radio advertisements placed by the County of Los Angeles reach some Orange County residents. These radio ads use Project Pollution Prevention as the program reference, rather than identifying the County of Los Angeles, as there is concern that the public responds less favorably to information coming directly from a government agency.



However, the Stormwater Program may wish to develop its own brand, as the messages delivered by the two agencies and the target audiences may vary.

Recommendations for incorporating messages from other outreach campaigns are included below.

Prepare a Master Timeline

We recommend creating a Master Timeline to ensure that educational messages are strategically delivered throughout this long-term campaign. This timeline will need to be created as specific outreach activities are outlined.

The Master Timeline should be sketched out to ensure that activities overlap and the public is continuously being exposed to stormwater pollution prevention messages. In addition, some activities will reach the public more effectively if they are conducted concurrently with other outreach. For example, a point-of-purchase campaign in automotive stores will be much more effective when integrated with radio public service announcements delivering automotive care messages.

Determine Messages

Effective environmental education follows a very simple formula:

Awareness ⇒ Understanding ⇒ Action

The components of this formula are straightforward:

- Awareness— The knowledge that a problem exists.
- Understanding— The development of a personal/human connection to the problem, both as part of the problem and part of the solution.
- Action— The motivation to change personal behavior to minimize personal impact on the problem.

While this formula seems rather elementary, it is a fundamental strategy for delivering a public education campaign. Because stormwater pollution is a complex issue, the transition through these phases is a bit slower than, say, a recycling campaign. The recycling message is simple, it requires one behavior change, and provides immediate personal reward.

Stormwater pollution, however, is intangible. While residents may be aware of and even understand the problem, motivating them to change a behavior is more complicated. The lack of immediate “feel-good” connection to any behavior change (BMP implementation) requires strategic analysis of motivators specific to the target audience, as discussed in Section III.

The data collected in the 1994 Orange County public survey does not illuminate the public’s current perception of the problem. Without this information it is difficult to determine whether (and what percentage of) the Orange County population is in the "awareness" or "understanding" phase. Based on outreach efforts to date, and regional trends, PSE predicts that a follow-up survey will show that the Orange County’s population is shifting from awareness to understanding.

The next public survey will determine how the Stormwater Program should direct its public education campaign— awareness, or understanding. A survey conducted 2½ years into the campaign will provide critical information on the public's progress from awareness to understanding, and will allow for message revision as necessary.

The following are examples of message content for each phase of education:

- *Awareness.* Our rivers, bays, and coastal waters are polluted.
- *Understanding.* Our daily human activities directly contribute pollutants to those waters. (What happens in Orange County's communities directly affects the waterways.) Human contact with these pollutants in the rivers, bays, and waterways can have adverse health effects. (PSE also recommends referring to the health/aesthetic affects upon humans in inland communities too, rather than just near waterways.)
- *Action.* Simple changes in daily routines can have a great effect on pollution prevention. Residents will have the power to take action after receiving the Stormwater Program's information on how to make a difference.

When an outreach program has shifted into the action stage, it is important to carefully gauge public support of the issue to sustain the momentum for pollution prevention. Research has shown that if the public has made behavior changes for a cause, they are interested in learning about the progress made toward solving the problem. PSE suggests periodic reinforcement messages “thanking” the public for helping to improve the quality of local waterways. This is a supplemental, yet direct, “feel-good” reward.

Integrating Other Environmental Program Messages

Stormwater pollution prevention offers an excellent avenue for effectively building upon other environmental issues and messages the public receives through other programs.

As mentioned, stormwater pollution is a complex issue and the public will be asked to adopt a plethora of BMPs. The most effective way to incorporate other environmental messages is to use these messages to define the BMPs for stormwater pollution prevention. For example, residents should be encouraged to:

- Recycle used motor oil;
- Dispose of household hazardous waste (paint, pesticides, household cleansers, etc.) at a designated collection site; and
- Recycle cans, bottles, paper, etc.

The language/vocabulary used in these BMPs should mirror that used in the specific outreach programs with which they are associated.

General Message Development Guidelines

All messages, whether used at the campaign or activity level, should be based on the motivators and current knowledge base of the target audiences, as determined through the research methods discussed in Section III.

When it is necessary to translate a campaign or activity message into another language, the message may need to shift focus to make it culturally applicable. Direct translations of messages created in English are often ineffective without incorporating cultural nuances.

Business Outreach Messages

Business education does not need to follow the formula above, as the motivation to change behavior usually is not based on a “feel-good” incentive. While the information included in the awareness and understanding phases, discussed above, is effective as background support, the message focus is different for businesses. While the most effective stormwater pollution prevention measures (BMPs) vary from industry to industry, the prime motivator for businesses to implement BMPs is the possibility of economic benefits. To this end, any communication with businesses should highlight the following points:

- Implementation of BMPs incurs little or no additional cost;
- Businesses are accountable under county and city water quality ordinances and these include penalties/fines; and
- Customers will be more supportive of an environmentally responsible business. Businesses can promote their concern for the environment by posting BMP information in their workplace, when applicable, and by making sure that all employees use the BMPs.

V. Delivering a Campaign

The preceding sections have reviewed, in detail, the planning elements necessary to create a comprehensive, effective outreach campaign. This section will build upon the Section IV discussion to prepare suggestions for delivering a long term, cohesive public education program.

The County of Orange's Role as Lead Permittee

The 1993 Drainage Area Management Plan (Section 6.3.1) states:

“The County of Orange will coordinate a County-wide public awareness program for the benefit of all co-permittees. This will be a regional public outreach program, addressing storm water quality problems and solutions applicable to all co-permittees. Individual co-permittees, at their option and expense, may choose to enhance the regional information to address specific storm water quality problems.”

As the lead entity for public education under the Stormwater Program, the County of Orange will be responsible for delivering all elements of the countywide campaign, including:

- Defining the elements of the education campaign and determining outreach activities;
- Developing and producing outreach materials for the campaign and related activities;
- Implementing activities to reach the public and businesses through a variety of avenues;
- Guiding cities through opportunities to participate locally in the countywide campaign;
- Periodically measuring public knowledge and effectiveness of the countywide education campaign by conducting public opinion surveys; and,
- Communication with cities at every stage of the campaign;

The Cities' Roles as Co-Permittees

Each city within Orange County will be encouraged to participate in the Stormwater Program's public outreach efforts. The resulting level of participation will vary from city to city and activity to activity. Possible areas for participation include:

- Review of the Stormwater Program's proposed countywide outreach campaign and activities;
- Implementation of the Stormwater Program's pollutant specific outreach activities on a local level; and,
- Distribution of materials produced by the Stormwater Program.

We will discuss participation opportunities in detail below (see Suggested Activities).

In addition, some cities have demonstrated a commitment to stormwater public education by producing their own materials and conducting outreach programs. These cities will be encouraged to incorporate the “brand” and key messages from the countywide campaign to ensure the delivery of a unified campaign.

The Public and Business Education and Outreach Guidebook

Approach to Creating the Guidebook

The Stormwater Program must structure the long-term public education campaign so that it can be easily implemented and so that cities can participate in campaign outreach efforts. To effectively communicate all plans for the outreach campaign, we recommend production of a *Public and Business Education and Outreach Guidebook*. This will outline all intended outreach activities, opportunities for cities to participate, and elements to be made available by the County— as the lead entity for public education under the Stormwater Program.

This tool will become the “bible” for this outreach campaign, and a unifying document that helps the Stormwater Program deliver a cohesive and comprehensive public and business education campaign. The *Guidebook* should include the elements enumerated below.

Elements of the Guidebook

The *Guidebook* will need to provide enough information so that anyone who is unfamiliar with the Stormwater Program’s outreach campaign will be easily able to understand its purpose, timing, goals and planned outreach. To that end, the following sections should be included in the guidebook.

Introduction— Review of Unified Approach and “Look”

Because this public education campaign will be the Stormwater Program’s first formal delivery of a long-term guided outreach strategy, it will be important to review the development process. This introduction should provide an overview of the sections in the *Guidebook*, and a discussion of the need for a countywide integrated approach (message and timeline) to ensure the most effective delivery and receipt of public education messages.

If applicable, this section should also introduce the Stormwater Program’s campaign “brand” (Section IV), and should encourage cities to include this brand on any outreach materials they produce.

Review of Goals

This section represents the Stormwater Program’s opportunity to formally outline the goals for a long-term campaign and its commitment to achieving them. The goals should be determined based on the criteria discussed in Section IV.

Review of Target Audiences

This section should review target audiences identified by the Stormwater Program for this campaign, reasons for targeting those audiences, and any related demographic information (and language requirements) for those audiences. Where available, this section should include specific data (from the public survey) regarding the current level of knowledge and concern regarding stormwater pollution among these audiences. In addition, this section should mention that specific outreach activities have been developed for each audience and are included in the Activities section of the *Guidebook*.

At this time, the Stormwater Program is interested in pursuing an outreach campaign targeting the following main audiences, so they should be included in this section:

- The general public/residents;
- The general business community; and,
- Mobile industries (discussed in Section VI).

In addition, the Stormwater Program will target specific pollutant-related or regionally based audiences, as needed. To this end, the activities recommended in this section will include recommendations for adapting outreach to a narrower audience.

Review of Key Messages

As discussed in Section IV, the Stormwater Program will need to develop a key message/theme for each main target audience and for incorporation into all outreach activities. These messages should be based on survey responses regarding the current level of awareness and understanding, and identified motivators for behavior change.

This section of the *Guidebook* should identify the key messages the Stormwater Program has selected, justification for the message selections, and a description of how they should be applied within this campaign. In addition, this section should provide examples for adapting the key messages to pollutant-specific or region-specific outreach efforts.

- A generic example of a key message: *All stormwater in Orange County drains to the ocean, without treatment.*
- A regional adaptation of this message: *All stormwater in [community] drains to [local creek or water body], without treatment.*
- A pollutant-specific adaptation of this message: *All stormwater in Orange County drains to the ocean, without treatment. So pick up your pet's waste, or you could end up swimming with it.*

This is a critical section of the *Guidebook*, as it will ensure that cities understand the key messages of the Stormwater Program's campaign so they can apply them locally. This countywide application will ensure that the public receives a unified message, and that all outreach efforts seek to shift public awareness in the same direction.

Review of Strategy for Measuring Effectiveness

We assume that the Stormwater Program will conduct a public survey to obtain a current gauge of public understanding of this issue before creating the *Guidebook*. Because this information will influence the key messages selected and the goals for public education, it will be important to include a summary of the research results in the *Guidebook*. This section should also identify the Stormwater Program's plans/timing for follow-up public surveys and any areas in which the Stormwater Program intends to use focus groups or informational interviews to test messages and materials.

In addition, this section should review the use of activity-specific measurement tools because these tools will be included under each activity described in the *Guidebook*.

Review of Master Timeline

As discussed in Section IV, the Stormwater Program will need to prepare a Master Timeline to ensure that the timelines for implementing the activities described in the *Guidebook* will overlap. This section of the *Guidebook* should review the Master Timeline strategy and explain that each Activity-specific timeline integrates that Activity into a unified outreach program.

Identify Activities

While it may seem that this is the most important element of the *Guidebook*, the Stormwater Program can not ensure the most effective campaign without the preceding elements. It is extremely important that the preceding elements set the stage for the activities introduced in this section. The activities in this section should be grouped under the two major audiences— the general public and businesses.

In presenting the activities to be implemented under this campaign, it is important to define the following areas for each activity:

- **Purpose:** Why this activity has been included and what it seeks to accomplish.
- **Target audience:** Who this activity will reach. This area should include an overview of how to shift this activity to a more specific audience (i.e. homeowners, auto owners, pet owners, or a region with a specific pollutant problem.)
- **Responsibilities of County:** The specific steps/tasks the County of Orange will implement and the specific educational materials the County will use or produce (if applicable). These responsibilities will be carried out on behalf of the Stormwater Program.
- **Opportunities for cities to participate:** Suggestions for local-level implementation of this outreach activity. This section should identify opportunities for coordinating with other environmental education or public outreach programs at the city level.
- **Timeline for implementation:** The anticipated milestones for implementation of this activity. These milestones can be identified by calendar quarters rather than specific dates.

- Tracking/measuring effectiveness (at the Activity level): Specific strategies for determining the success of outreach conducted under this activity.

Suggested Activities

The following sample activities have been created under the format outlined above. Most activities have been outlined generally, with recommendations for application to more specific audiences/purposes. This section details the following activities:

General Public/Residents:

- Activity 1— Educational Materials
- Activity 2— Hotline
- Activity 3—Website
- Activity 4— Media Relations Campaign
- Activity 5— Community Outreach Campaign
- Activity 6— Advertising Campaign
- Activity 7— Speakers Bureau
- Activity 8— School Outreach
- Activity 9— Partnerships with Internal County/City Agencies and Contractors
- Activity 10— Participation in Events
- Activity 11— Radio Public Service Announcement Campaign

Businesses:

- Activity 1— Educational Materials
- Activity 2— Business Association Outreach
- Activity 3— Partnerships with Internal County/City Agencies
- Activity 4— Hotline
- Activity 5—Website

The information provided below includes discussion of recommendations and instructions for including activities in the long-term outreach campaign. When including these activities in the *Guidebook*, the language will need to be revised to provide more informational descriptions of outreach plans and to include a specific timeline for each activity.

Outreach Activities for General Public/Residents

Activity 1— Educational Materials

Purpose:

Educational materials are most influential if delivered to support public outreach efforts, rather than as stand-alone educational tools. They can communicate educational messages effectively if they are well-designed and the content is clear. To this end, we strongly recommend production of educational materials to support the Stormwater Program's long-term public education program.

As discussed in Section IV, the key messages delivered in these materials will be most effective if they result from information gleaned in a public survey. While all materials should include a combination of stormwater pollution information and best management practices, the theme should reflect the public's current level of knowledge and motivators, to be identified in the public survey. All materials should also include the Stormwater Program's campaign brand and refer to the hotline and Website (as available) for more information.

When referring to behavior changes, we recommend stressing that these are simple things residents can do, with great benefits. Rather than using the term "best management practices," we recommend using "safe/good housekeeping practices" for any communication with residents. The language used to describe the safe practices should be straightforward— "just tell me what you want me to do and I will do it" is a common attitude among the public.

In addition, because the behavior changes necessary for stormwater pollution prevention are numerous and encompass a variety of activities, we recommend that the Stormwater Program produce activity-specific materials (i.e. one for pet owners, one for auto maintenance, one for home owners) whenever possible. This will narrow down the list of activities a resident is asked to implement, which will make the shift to being "environmentally responsible" seem like less of a lifestyle change.

The Stormwater Program currently uses three brochures, *The Ocean Begins at Your Front Door*, *Preventing Sea Sickness* and *Do You Know Where the Water in Your Storm Drain Goes?* These brochures each provide a good overview of the issue and recommended behavior changes, but the format and the volume of information included in each is a bit overwhelming.

The traditional brochure format has been overused. Residents constantly receive brochures regarding a variety of topics, through the mail, at events, etc. We recommend producing educational materials in various sizes (pocket-size) and shapes (square) and of high graphic quality to make them stand out among the sea of brochures that residents typically receive.

Posters can also be effective to reinforce key messages. We strongly recommend that the poster deliver the campaign's key message, with minimal other text.

Videos can be effective if they are of high production quality and the style is comparable to a television program. In this era of "channel surfing," the public is quite comfortable with shifting attention quickly from topic to topic. The Stormwater Program's current video, "The Ocean Begins at Our Front Door," may be effective if used on a loop at an event or public counter. It may also be appropriate for distribution to teachers who request stormwater materials. Due to high costs, we do not recommend production of an additional video at this time. Public service announcements will be discussed under Activity 11 below.

Target audience:

The general public and pollutant specific segments of this audience.

Responsibilities of County:

- Work with graphic designer to create format for activity-specific handouts, posters, etc.
- Prepare text for these materials.
- Translate text, as necessary.
- Share the mock-ups for the materials with cities and determine quantities to produce. (These quantities must be within a range approved by the Technical Advisory Committee.)
- Print materials.

Opportunities for cities to participate:

- Review materials produced by the County and submit request for a specific number of copies.

Timeline for implementation:

The public survey will provide valuable information for use in the development of these materials, so this activity must follow the survey. In addition, because these materials will introduce the Stormwater Program's campaign message and "brand," we recommend production of these materials before the campaign launch.

Tracking/measuring effectiveness:

The public survey will provide a good understanding of the public's current level of understanding and the most effective motivators for behavior change. While use of focus groups to test mock-ups for materials will enhance their effectiveness, it will not be critical if the materials are based on public survey data and produced by a high quality graphic designer. In addition, because the public's level of understanding of this issue is expected to increase over the course of this campaign, it will be important to update educational materials based on results of follow-up public surveys. Please refer to Section IV for a more detailed discussion of message development and progression.

Activity 2— Hotline

Purpose:

Like educational handouts, a stormwater hotline will support most campaign outreach efforts by providing the public with a resource from which it can request more information or report a polluting activity. The Stormwater Program will need to determine if it will use one unified hotline or continue to reference the appropriate contact number for each city. We strongly recommend establishing and promoting a countywide hotline. As with the Stormwater Program brand, countywide promotion of a single stormwater hotline will lessen confusion among the public of who to contact to make a report or to request more information regarding stormwater pollution.

At this time, the County of Orange and many cities operate hotlines with live operators. If, in the future, the County and cities decide to use automated answering services (not

recommended), we strongly recommend that the tree of options is organized logically and is easy to navigate. In addition, the County and cities must be sure to respond promptly to caller requests (and follow up on reports made) to build confidence among users that the hotlines are effective.

Target audience:

Any resident exposed to any other educational activity in this campaign.

Responsibilities of County:

- Establish and maintain a hotline for public requests and reports.
- Respond to requests and reports promptly.

Opportunities for cities to participate:

- Include the Stormwater Program's hotline number on all outreach materials.

Timeline for implementation:

This is a continuing activity because this mechanism will support all outreach activities.

Tracking/measuring effectiveness:

We assume that all calls to the hotline are currently being logged. Because promotion of the hotline will occur in most outreach activities/materials, it will be important for the Stormwater Program to periodically review/chart the number of incoming calls to measure increased public use over the course of the campaign.

In addition, if the Stormwater Program plans a specific outreach activity to increase the number of incident reports to the hotline, the number of incoming calls during that period should be measured against the number of calls received during the same period in previous years.

Activity 3—Website

Purpose:

A Website will also support outreach activities by serving as a resource through which residents can obtain additional information and report polluting behavior (via e-mail). In addition, with the dramatically increasing use of the Internet as an information resource, a Website can function as a stand-alone outreach "activity." It will be important to promote the Stormwater Program Website in the following ways to ensure that residents can easily find it:

- Register the site and all associated keywords with all search engines.
- Conduct outreach to related groups/organizations to place links on all associated Website (i.e. the Long Beach Aquarium, local environmental groups, and Stormwater Program agencies).

The site should be designed with up-to-date graphics and include the Stormwater Program "brand" to separate it from other government agency sites. The Stormwater Program should have a professional design the site as a stormwater public education tool

rather than a prosaic description of the education program. Specifically, the site should be written for the general public and businesses who are interested in stormwater pollution— not Stormwater Program logistics. This will ensure that the site increases public understanding and motivates behavior change.

Target audience:

Residents exposed to the Stormwater Program's public education campaign through an outreach activity, and Web surfers seeking more information on stormwater pollution prevention.

Responsibilities of County:

- Select a host for the Stormwater Program's Website.
- Prepare text for the site.
- Work with a designer to create the site and include the text.
- Register the site and all associated keywords with all search engines.
- Conduct outreach to related groups/organizations to place links to all associated Websites.
- Update messages and time-sensitive information as necessary.

Opportunities for cities to participate:

- Provide a link to the Stormwater Program's Website on your city's Website.

Timeline for implementation:

Because of the increasing dependence on the Internet for information, we recommend creating this site as soon as possible.

Tracking/measuring effectiveness:

Hits are easy to track. We recommend that the Stormwater Program track/chart the number of hits over time and attempt to link any spike in the chart with the outreach activity responsible.

Activity 4— Media Relations Campaign

Purpose:

The public relies on the news media for new information. A strategic media relations campaign will support the Stormwater Program's public education efforts by delivering issue-specific information through the sources the public trusts. It will also be important to develop strong media relations to promote any corporate partnerships established in this program and to gain recognition for corporate support.

Target audience:

Outreach efforts directed to the general news media will reach the general public. Media relations efforts can be directed to community papers, specific ethnic press, special sections of publications (such as the gardening columns), or issue-specific radio shows (such as auto care/maintenance).

Responsibilities of County:

- Prepare an annual media relations strategy identifying all seasonal events that can be tied to stormwater pollution and any launches of notable outreach efforts, such as a point-of-purchase campaign. This strategy should be flexible enough to allow for immediate media relations outreach, when necessary, to piggy-back on stormwater-related items in the news.
- Prepare a media contact list for all regional, ethnic and community-specific publications and television and radio outlets.
- Prepare and distribute news releases as outlined in the media relations strategy.
- If possible, promote the availability of a storm drain channel tour (or an equivalent visual experience) for news reporters.
- When applicable, invite the relevant city's media relations representatives to participate in interviews.

Opportunities for cities to participate:

- Provide the County with contact information for community publications.
- Provide the County with information about city representatives available for interviews.
- Refer inquiries from the local media to the Stormwater Program's media relations contact.

Timeline for implementation:

Media relations should be conducted throughout the five-year campaign, but the strategy should be revisited annually to incorporate new ideas, new activities, and shifts in program direction. Timing for specific media relations efforts should be tied to launches of outreach efforts, seasonal events affecting stormwater quality, and immediate responses to related items in the news.

Tracking/measuring effectiveness:

We recommend collecting copies of all articles placed, audio clips of radio reports and video clips of television news reports. While the radio and television clips must be purchased from clipping services, this collection provides a great portfolio highlighting the success of this outreach effort.

Activity 5— Community Outreach Campaign

Purpose:

A community-specific outreach campaign is an excellent way to saturate a specific community with a message. Possible reasons for this type of campaign include:

- Scientific data determines a specific stormwater pollutant (i.e. pesticides) is coming from the community.
- A particular type of behavior (i.e. illegal dumping) occurs more frequently in this community.

Target audience:

The residents in an identified geographic region. This group may be refined to the users of a specific pollutant in the identified area.

Responsibilities of County:

- Define the key message for this campaign. (Because these campaigns are usually focused, we recommend conducting a focus group to test this message. The group will also provide valuable information on public perception of the pollutant-specific issue.)
- Identify and obtain contact information for all community groups, neighborhood associations, schools, senior centers, houses of worship, community centers, publications, and news media in the specific area.
- If necessary, prepare educational materials specific to the issue, focusing on the behavior change you are seeking (i.e. using a hotline to report something or request information, recycling used motor oil, or proper disposal of horse waste).
- Work with all groups in the community to schedule speaking engagements and distribute materials at their regular meetings or place articles in their membership newsletters.
- Staff booths at events in the community and focus on the message from this campaign (rather than general stormwater messages or other behavior changes).
- Work with the local news media to highlight both the specific problem in the area and the campaign the Stormwater Program is undertaking to rectify that problem. Make sure you are promoting what you want the residents to do.
- Work with the community newspapers to place advertisements. The artwork can be similar to that in the educational handouts.
- If the target pollutant issue is product-related, identify all businesses in the community that sell the product. Ask these businesses to place proper disposal/handling information on the product (sticker or neck-hanger), as a stand-alone display in the aisle near the product, or at the checkout counter.
- Follow up with any group or business that participated, recognizing their contribution to this outreach effort.

Opportunities for cities to participate:

For the city(s) in which the target community falls, the following are areas for support of County efforts:

- Help identify and obtain contact information for all community groups, neighborhood associations, schools, senior centers, houses of worship, community centers, and news media in the target area.
- Offer your city's letterhead (and mayor's signature?) for letters soliciting support/partnership from local groups and businesses.
- Provide recognition of participating groups and businesses by awarding them certificates of commendation from your city.

Timeline for implementation:

We recommend implementing this type of outreach campaign on a short timeline— three to six months. This intensive delivery will ensure that residents are exposed to the message over and over in a short amount of time, which ensures higher absorption. In addition, this short timeline will allow for more immediate measurable results directly attributable to this campaign.

In addition, if the campaign is product-related, we recommend implementing the campaign just before or during the period in which residents are most likely to use the product (i.e. pesticides and paint in spring and summer).

Tracking/measuring effectiveness:

The ability to measure the effectiveness of this type of campaign will be based on the data available for the behavior before the outreach. (This would include the number of reports or requests coming into the hotline from the target area during the timeframe in previous years, or the original scientific water quality data that indicated a need for public outreach).

Outreach effectiveness can be measured by comparing data collected during and after the campaign with that collected previously. For water quality measurements, it may be necessary to wait for rain in order to collect accurate comparable data.

Activity 6— Advertising Campaign

Purpose:

A well-designed mass media advertising campaign can be an extremely effective way to reach a huge number of residents. Although this type of campaign is costly, if it is focused, it provides a broad-stroke delivery of your key messages, supporting all other outreach efforts. Based on the target audience, and specific ad placement costs in Orange County, such a campaign would most likely include a combination of radio and print.

Target audience:

A campaign of this magnitude must be focused. We recommend such a campaign only if the Stormwater Program conducts an extensive public survey to determine the segment of the general public that contributes significantly to pollution and whose members are most likely to change their behavior. If this information is available, all ad space/time should be bought based on the stations and publications that best match the demographics of the target audience segment.

Responsibilities of County:

- Work with advertising agency to create advertisements. (Unless your primary goal for the campaign is to get the public to call your hotline, we recommend staying away from using a hotline as a key message of the campaign. Because the advertisements will have very short time to deliver your message, if your primary goal for the campaign is to motivate the public to implement a behavior change, focus on that message.)

- Work with advertising agency or media buyer to develop ad placement strategy.
- Work with advertising agency or media buyer to purchase ad space.

Opportunities for cities to participate:

- Purchase ad space in community publications and place ads produced by the County.
- Encourage community publications to donate space for placement of ads produced by the County.

Timeline for implementation:

Because the budget for this type of campaign will vary, we strongly recommend working with a professional media planner to determine the most effective placement schedule. This schedule will most likely range from two to six months, and will be designed to maximize the number of times a resident is exposed to the message.

This ad campaign could be repeated annually during the five-year span of the public outreach campaign, but the message will need to be updated as the level of public understanding increases.

Tracking/measuring effectiveness:

While the media outlet will provide information on how much of the population was reached and how many times they were exposed to the message, this does not provide real data on whether the campaign influenced behavior change or improved public understanding of the issue. The most effective way to measure a shift in knowledge or behavior is a through the next countywide public survey.

Activity 7— Speakers Bureau

Purpose:

As in Activity 5, this activity takes advantage of existing community groups as an excellent avenue for educating residents. Many of these groups meet regularly and are open to guest speakers to discuss local issues. Educational materials should be distributed at these meetings to reinforce messages delivered. Residents who participate in these meetings are usually interested in the well being of their communities and want to do the right thing.

Target audience:

Any group in Orange County interested in hosting a speaker at a meeting. These groups include community organizations, neighborhood associations, schools, senior centers, houses of worship, community centers, and garden clubs.

Responsibilities of County:

- Train a few staff members to make presentations to community groups. The presentation should focus on the key messages of the overall campaign, for maximum benefit.
- Prepare a flyer promoting availability of speakers and distribute it when staffing booths at events.

- Develop a list of community groups in Orange County and periodically contact them to schedule speakers. If a group does not have regular meetings or does not want a speaker, ask them to distribute your educational materials to their members or place an article in their newsletter.
- Prepare drop-in newsletter articles and distribute upon request.
- Make presentations as requested.

Opportunities for cities to participate:

- Provide the County with contact information for local community groups.
- Notify the County of speakers available to represent your city.
- Promote availability of County speakers when interacting with local community groups.
- Refer requests for speakers to the County.

Timeline for implementation:

This is a continuing activity; presentations are made on an as-needed basis. Community groups should be contacted at least once a year to offer a speaker and distribute materials. The list of groups should be updated as needed. If an intensive outreach effort to promote speakers is planned, it should be built into the Master Timeline.

Tracking/measuring effectiveness:

Obviously, tracking the number of meetings attended and attendees at each meeting will provide a report of how many people have been directly reached. Tracking the quantity of outreach materials distributed is more difficult. Unless the materials are actually handed out by the speaker, they may not reach their intended recipients. Copies of newsletter articles are great proof that your message has reached a membership, as the majority of a group's members will read the newsletter.

Activity 8— School Outreach

Purpose:

We understand that the Stormwater Program is not currently interested in creating a school outreach program. However, it is inevitable that teachers will contact the Stormwater Program to request more information about stormwater education for their classes. To this end, we recommend that the Stormwater Program research existing educational programs (i.e. Project Wild, MWD, and other agencies) and materials available and make a list of contacts for these programs. This list can be distributed upon request, to make sure that any interest in teaching youth about the environment is supported.

Target audience:

Teachers in the Orange County seeking more information on environmental education opportunities.

Responsibilities of County:

- Research existing environmental education programs for primary and secondary school students.

- Prepare a list of these programs (including program summaries).
- Distribute this list to all cities and as requested.

Opportunities for cities to participate:

- Distribute the list of existing school education opportunities to local teachers.

Timeline for implementation:

This list will need to be updated annually and should be distributed upon request.

Tracking/measuring effectiveness:

Because this outreach is merely providing resources to ensure students have the opportunity to become environmentally responsible, there is no short-term measurable outcome associated with this activity.

Activity 9— Partnerships with Internal County/city Agencies and Contractors

Purpose:

Many agencies within— and contractors to— the County and cities have regular contact with the general public. These avenues provide an excellent opportunity to cost-effectively reach the public with stormwater pollution prevention messages.

Target audience:

The agencies within the County and cities that have contact with the general public. These agencies will provide a direct connection with the public, the indirect target. Also, contractors who provide a communications service to the County and cities (i.e. information technology specialists, utilities and cable providers).

Responsibilities of County:

- Identify County divisions that have regular contact with the public such as:
 - animal services (license renewal and shelters);
 - police (neighborhood watch groups);
 - permitting offices (public counters);
 - transportation (buses and bus shelters have advertising space); and ,
 - any environmental outreach program (recycling and composting).
- Identify County contractors that provide communications services.
- Determine what the County could bring to a relationship with each of these agencies, if applicable, (i.e. producing a display for each animal shelter that holds stormwater materials as well as animal services materials).
- Contact each group, establish a relationship, and encourage them to place materials at public desks, to place an article in a public newsletter, to insert materials in mailings, or to invite speakers to make presentations at meetings, when applicable. When working with a group that currently makes presentations to the public, encourage them to distribute stormwater education materials at the meetings.
- Work with County contractors to negotiate opportunities to place stormwater pollution prevention messages. These opportunities may include PSA placement through cable providers, materials distribution through utilities' bill mailings, and Website design/support from information technology contractors.

Opportunities for cities to participate:

- Identify appropriate divisions in your city, establish relationships, and encourage them to distribute Stormwater Program materials or invite speakers from the Stormwater Program.
- Incorporate communications benefits when negotiating with contractors such as communications providers.

Timeline for implementation:

This can be a continuing activity. If an intensive outreach effort is planned with any one division, it should be built into the Master Timeline.

Tracking/measuring effectiveness:

Because the partnerships will vary, it will be most effective to identify and document the benefits gained from each partnership as outreach that would not have been possible without a partnership.

Activity 10— Participation in Events

Purpose:

Personal interaction with the public is a great way to communicate educational messages effectively, superior to mere distribution of materials at events.

Events occur throughout Orange County and draw a significant percentage of the population. We recommend, whenever possible, focusing Stormwater Program participation in events that are “pollutant-specific” (i.e. dog walks, horse shows, auto shows, and garden shows).

Because these types of events include many booths, all striving for the public’s attention, it is important to have eye-catching professional displays to draw residents to the booth. The City of Los Angeles has a quite effective nine-foot tall plywood cutout— the Storm Drain Pollution Monster— that a City employee created. The Monster towers over the booth, and attracts children to it. While children are having their picture taken with the monster, City staff has a great opportunity to discuss pollution prevention tips with parents. The City has also created a cardstock “frame” for the photo, which includes pollution prevention tips and the City’s stormwater hotline number.

Target audience:

The general public. In addition, this activity may be focused to target residents most likely to engage in polluting behaviors (i.e. pet owners and home gardeners).

Responsibilities of County:

- Ensure that the Stormwater Program has an eye-catching display for a booth.
- Identify appropriate events throughout Orange County in which to participate.
- Secure booth space at these events.
- Staff booths at these events.

Opportunities for cities to participate:

- Inform the County of events in your city.
- Provide staff to work with County representatives at events in your city.
- Borrow the Stormwater Program's display (if available) for use at local events.

Timeline for implementation:

Public events occur throughout the year. We recommend selecting events in which to participate annually. This recurring planning will allow for adjustments based on successful participation in previous years.

Tracking/measuring effectiveness:

The number of people who visit the booth determines if the display (and staff) is drawing people to the booth— and if the event itself was worth Stormwater Program participation.

Discussions with the public will reveal anecdotal information including what the public knows about the issue and comments on the Stormwater Program's program efforts to date. While this information is not necessarily specific to this outreach effort, event participation serves as an effective vehicle through which the Stormwater Program can also measure the effectiveness of the overall program.

Activity 11— Radio Public Service Announcements

Purpose:

Radio public service announcements (PSAs) are a low-cost avenue to reach large populations with an educational message. Radio PSAs are also a great opportunity for promoting public events. Most often, radio PSAs are submitted as text and either recorded by the station or read live.

Target audience:

The general public. This outreach effort can be tailored by only distributing the PSA to stations with the listeners you are seeking.

Responsibilities of County:

- Determine applicable radio stations in the Orange County.
- Contact target radio stations to determine if they accept PSA text and what lengths they prefer (10, 20, 30 and/or 60 seconds).
- Prepare PSA text. (We recommend preparing at least one PSA for each length.)
- Distribute PSA text to radio stations with an introduction to issue and Stormwater Program contact information.
- Track PSA airtime, if available.
- Present radio stations that aired the PSAs with Certificates of Commendation from the County's Board of Supervisors or an alternate County office.

Opportunities for cities to participate:

- Encourage local radio stations to air radio PSAs.

Timeline for implementation:

Radio PSAs can be submitted (and resubmitted) often during this long-term campaign, but the text should be rewritten annually (or bi-annually) to reflect shifts in key messages. For distribution of general campaign messages, we recommend annual development of text for PSAs, and distribution to all stations that will accept them. We also encourage distribution of event-specific or seasonal stormwater messages, as applicable.

Tracking/measuring effectiveness:

Unlike purchasing radio time, submitting text for radio PSAs does not guarantee placement. If PSA text is read on the air, it is difficult to track on what stations and how often. These limits make measuring effectiveness very difficult. We recommend following up with public affairs directors at each station to ask if the PSA is being used and how often. The Stormwater Program may receive some informed answers, but most often the stations cannot provide that information because they are overwhelmed with PSAs.

For this reason, we do not recommend using television PSAs. If the Stormwater Program currently has a 30- or 60-second television PSA produced, it is worthwhile to redistribute it annually to regional television stations. However, we do not feel it is cost-effective to invest in production of a television PSA because of the difficulty in tracking placement.

Outreach Activities for Businesses

Because most industries (other than mobile businesses) are similarly organized, it is possible to create a general approach for business outreach and apply it to most industries. Specific outreach activity recommendations for mobile businesses are included in Section VI.

Activity 1— Educational Materials

Purpose:

At this time, the Stormwater Program has not produced business-specific educational materials. Because the nature of the message and the behavior changes sought differ significantly from those for the general public, we strongly recommend production of business-specific materials.

Although it is possible to use a general business brochure, it will not be very effective, as BMPs vary significantly from industry to industry. We recommend producing a series of outreach materials, similar in appearance, yet industry-specific.

The audiences within a business (owners, managers, and employees) require different levels of information to implement best management practices. To this end, it will be important for the Stormwater Program to address each audience in the outreach materials.

We recommend creating a two-part educational handout, either two-sided or two separate pieces. One part, directed towards owners and managers, should include a description of the issue, the ordinance, and address motivators for complying (i.e. fines and customer appeal). This part could be similar, if not identical, for all industries if written in general

language. The other part, for employees, should present the industry-specific best management practices graphically with a small amount of text (elementary language), in applicable languages.

When identifying BMPs to be included for each industry, the Stormwater Program must consider the cost of any required equipment, and the time required to implement that extra step. Both of these factors will influence the supervisors' and employees' willingness to add the pollution prevention measures to their operations.

In addition, all materials should reference both the hotline and Website (as available) for more information regarding stormwater pollution, ordinance compliance, and BMP implementation.

Target audience:

Industries that may adversely affect stormwater quality.

Responsibilities of County:

- Determine and rank industries whose practice may affect stormwater quality. The ranking should be influenced by the information collected in Activities 2 and 3 regarding industries that will be reached through inspections, and existing business associations. (Additional discussion of target business selection is in Section IV.)
- Work with a graphic designer to brainstorm a format for the two-part educational handout.
- Prepare text for the overview/introductory section of the handout.
- Work with a graphic designer to prepare a template for the industry specific BMP section of the handout.
- Work with a graphic designer to create a formal mock-up of the two-part piece.
- Conduct focus groups with employees to test the format and content of the BMP-specific piece.
- Conduct focus groups with owners and managers to test the format and content of both pieces.
- Determine applicable BMPs for the top priority industries.
- Work with a graphic designer to create illustrations for BMPs and to finish the two-part educational handout for the top priority industries.
- Share final mock-up with cities and collect information regarding how many copies they would like.
- Print the two-part handout for the top priority industries. (This is based on the assumption that the cities will not require city-specific versions.)

Opportunities for cities to participate:

- Determine number of copies, for each industry, that your city will be able to use and submit this number to the County.

Timeline for implementation:

This production should occur before outreach under Activities 2, 3, and 4. However, it will be important to include research from these activities in determining priority

industries. As the Stormwater Program moves through the long-term strategy, it will most likely need to produce materials specific to additional industries. All materials should be reproduced as necessary.

Tracking/measuring effectiveness:

To ensure that these materials not only attract the attention of the intended audiences but also motivate them to implement BMPs, we strongly recommend using focus groups to test the intended format and content with applicable audiences. The focus groups should include a mix of representatives from the target industries.

Tracking of distribution of these materials will occur under actual outreach activities.

Activity 2— Business Association Outreach

Purpose:

Many of the larger industries have business/professional organizations and associations that serve their members. These associations usually have regular meetings for their members and most often distribute a regular newsletter with updates on changes in the industry. Partnering with regional chapters of these organizations to reach their members with stormwater pollution prevention messages is a cost-effective way to make contact with a large number of businesses in Orange County.

Target audience:

The membership of the business associations within Orange County that represent industries that may adversely affect stormwater quality.

Responsibilities of County:

- Identify the industries within Orange County that may affect stormwater quality;
- Identify the business associations that represent those industries;
- Prepare a drop-in newsletter article (with a version tailored for each industry) reviewing the issue, the ordinance, and applicable BMPs;
- If necessary, train the general public speakers bureau to make technical presentations delivering BMP information;
- Contact each applicable business association, determine what outreach avenues they have available (i.e. newsletter, regular meetings and annual workshops); and,
- Subsequently pitch speakers and article placement to increase understanding of compliance requirements.

Opportunities for cities to participate:

- Provide the County with information on business association local chapters; and,
- Refer requests from business associations for information or speakers to the County

Timeline for implementation:

If internal partnerships under Activity 3 are successful, the Stormwater Program should coordinate business association outreach with the inspection timelines. For example, if health inspectors will be visiting restaurants (and distributing materials) in May and June,

focus attention on information dissemination through restaurant associations in May and June as well.

Tracking/measuring effectiveness:

Because this is a cost-effective outreach strategy, it will be beneficial to track the success of this activity by the number of partnerships established and the resulting educational outreach conducted. In addition, request and keep on file copies of all newsletter articles placed.

Activity 3—Partnerships with Internal County/city Agencies

Purpose:

Many agencies within the County and the cities have regular contact with businesses in Orange County. These avenues provide an excellent opportunity to reach these businesses with stormwater pollution prevention messages cost-effectively.

Target audience:

The agencies within the County and the cities that have contact with the business community. These agencies will provide a direct connection with the businesses in Orange County, the indirect target.

Responsibilities of County:

- Identify County divisions that have regular contact with businesses in the county, such as:
 - fire department (inspections);
 - health department (inspections); and,
 - permitting offices (public counters).
- Determine what the County could bring to a relationship with each of these agencies, if applicable (i.e. promoting the health department's hotline on stormwater educational materials for businesses).
- Contact each office, establish a relationship with them, and encourage them to place materials at public counters and distribute materials during site inspections. If applicable, ask them to include a couple of stormwater pollution prevention tips as they conduct each site inspection (i.e. including proper procedures for cleaning floor mats when visiting restaurants).

Opportunities for cities to participate:

- Identify appropriate divisions at the city level, establish relationships, and encourage them to distribute County materials or place them at public counters.

Timeline for implementation:

This can be a continuing activity. If an intensive outreach effort is planned with any one division, it should be built into the Master Timeline.

Tracking/measuring effectiveness:

Because the partnerships will vary, it will be most effective to identify and track the benefits gained from each partnership as outreach that would not have been possible without a partnership.

Activity 4—Hotline

Purpose:

Like educational handouts, a Stormwater Program hotline will support most outreach efforts under this campaign by providing businesses with a resource for requesting more information or reporting a polluting activity.

Target audience:

Any business owner, manager, or employee exposed to any other educational activity in this campaign.

Responsibilities of County:

- Establish and maintain a hotline for requests and reports from businesses.
- Respond to requests and reports promptly.

Opportunities for cities to participate:

- Include the Stormwater Program's hotline number on all outreach materials, unless your city has an efficient hotline in place.

Timeline for implementation:

This is a continuing activity because this mechanism will support all outreach activities.

Tracking/measuring effectiveness:

We assume that all calls to the hotline are currently being logged. Because promotion of the hotline will occur in most outreach activities/materials, it will be important for the Stormwater Program to periodically review/chart the number of calls coming in to the hotline to measure the increased public use over the course of the campaign.

In addition, if the Stormwater Program plans an outreach activity to specifically increase the number of incident reports to the hotline, the number of calls coming in to the hotline during that period should be evaluated against the number of calls received during the same time period in previous years.

Activity 5—Website

Purpose:

A Website will also support outreach activities by serving as a resource through which business representatives can obtain additional information and report polluting behavior (via e-mail). In addition, with the dramatically increasing use of the Internet as an informational resource, a Website can function as a stand-alone outreach "activity."

Target audience:

Business owners, managers, and employees exposed to the Stormwater Program's public education campaign through an outreach activity or who seek more information on stormwater pollution prevention.

Responsibilities of County:

- Select a host for the Stormwater Program's Website.
- Prepare text for the site.
- Work with a site designer to create the site and include the text.
- Register the site and all associated keywords with all search engines.
- Conduct outreach to related groups/organizations to place links to all associated Websites.
- Update messages and time-sensitive information as necessary.

Opportunities for cities to participate:

- Provide a link to the Stormwater Program's Website on your city's Website.

Timeline for implementation:

Because of the increasing dependence on the Internet for information, we recommend creating this site as soon as possible.

Tracking/measuring effectiveness:

Hits should be easy to track. We recommend that the Stormwater Program track/chart the number of hits over time and attempt to link any spike in the chart with the outreach activity responsible.

Selecting Outreach Activities to Implement First

The activities described above each include the types of applications that are appropriate. Although PSE recommends that the Stormwater Program create a master timeline for implementation of all outreach activities, we understand that the Stormwater Program is eager to begin outreach. PSE also recognizes that some of the activities described above incur higher costs and/or require specific audience profile research to be cost effective (i.e. Mass Media Advertising).

To that end, PSE has identified the activities that will be most cost-effective to implement first. For reaching the General Public, we strongly recommend development of simple outreach materials (Activity 1) and distribution through existing avenues (Activities 5, 7, and 9). For reaching Businesses we recommend development of business-specific materials (Activity 1) and distribution through internal County/city agencies (Activity 3). As mentioned many times in this document, any outreach materials and messages will be most effective if the Stormwater Program first conducts a survey to gauge the current level of knowledge and motivators for behavior change.

Using Consultants to Develop and Implement the Outreach Campaign

Much of this document has stressed the importance of creating and delivering a unified outreach campaign that uses a set of messages, timelines, activities, and materials that work together synergistically to achieve a profound shift in public awareness and behavior— in the most cost-effective manner. Since it will take meticulous planning and oversight to ensure that each element of the campaign moves forward as part of the whole “package,” PSE recommends that the Stormwater Program carefully consider the strategy it will employ to achieve the objectives of such expanded public outreach efforts.

As the lead entity in charge of public education under the Stormwater Program, the County of Orange will be responsible for providing the staff to administer and manage this campaign. To help the Stormwater Program better understand how consultants may be utilized to support the County in its efforts, PSE has prepared two scenarios. PSE is not in a position to recommend which scenario is best for the Stormwater Program’s outreach campaign. However, we have provided a review of some advantages and disadvantages associated with the two possible scenarios.

Scenario A

Scenario A involves hiring **one** consultant firm, with subcontractors, to manage the Stormwater Program’s outreach campaign elements. This scenario will require creation of a fairly specific scope of work— which can be derived from the information in this document— for ease of tracking the consultant’s progress. Scenario A will also require the County of Orange to dedicate ½ a staff person to monitor the efforts of the consultant, administer the contract, and track the participation of the cities in this outreach campaign.

Advantages

- The Stormwater Program will only need to manage one contractor.
- In the RFP process, the consultants that submit proposals (and proposed budgets) will help determine the budgetary needs of the campaign— which may also provide clarification of funding necessary from the Stormwater Program.
- With one contractor and a fixed budget amount, costs are much easier to control.
- The County of Orange will not have to overcome a contract/project management learning curve for a dedicated staff person.

Disadvantages

- The administration of this scenario is more expensive because the Stormwater Program will be paying the consultant to coordinate work among sub-consultants rather than a County staff person to manage a number of contracts.
- The Stormwater Program will be responsible for preparing and issuing an RFP for this work— and evaluating the responses it receives— and this process can be time consuming.
- The Stormwater Program will be under pressure to select the “right” consultant team, as only one team will be selected.

Scenario B

Scenario B involves hiring **a number of** consultants— through a number of contracts— to implement individual elements of the Stormwater Program’s outreach campaign. Scenario B would require Orange County to dedicate one full-time staff person in addition to the ½ time staff person, as this scenario requires supervision of several contracts and coordination of the program as a whole.

Advantages

- Stormwater Program can solicit the lowest cost alternative per element.
- Close supervision of many contractors allows the Stormwater Program to have maximum control over consultants and the work product (assuming each scope of work is very specifically defined).

Disadvantages

- Because of the number of separate contracts to develop and implement elements of the program, it may be difficult to achieve an overall unified campaign without extraordinary staff management. This may also result in overlap of contact with the public and Orange County residential and business representatives.
- The dedicated County of Orange staff person would need to have previous consultant management experience in public relations (or absorb the learning curve).
- Multiple contracts do not provide great cost controls for the entire stormwater program, so this scenario may result in a higher overall campaign cost.
- The County of Orange will need to dedicate one additional staff person.

V. Mobile Industry Outreach

Overview

While serving their customers, mobile businesses generate a variety of pollutants that enter our waterways via the storm drain system. These pollutants include waste water that carries automobile fluids, cleaning fluids, pesticides, herbicides, street litter, and other harmful substances; green waste from landscaping; paint chips, bits of concrete and dirt from repairs; food grease and waste from restaurant clean-up, etc.

Many businesses are aware of these problems but need to be educated on viable, time- and cost-effective solutions to reduce and control runoff. The Stormwater Program is currently evaluating how to prepare an outreach effort to inform mobile businesses of the Best Management Practices (BMPs) that will enable them to deliver their services with minimal additional effort and in a way that meets legal requirements for environmental protection.

However, the Stormwater Program faces significant challenges to the goal of reaching mobile businesses and gaining their compliance with the BMPs. These challenges include the diversity of mobile businesses; the variety of sizes and resources of companies doing the same work (which can range from large, licensed organizations to unregistered, seasonal, one-person operations); the transient nature of these operations; diverse educational backgrounds; and cultural differences of business owners and their staffs (many of whom do not speak English).

Because customers of these businesses share in the liability for stormwater pollution that originates on their property— and because many business owners will be difficult to reach— the Stormwater Program needs to focus its outreach efforts on customers as well as mobile business operators. The Stormwater Program can also call upon manufacturers and distributors of supplies to help inform business owners about the BMPs and legal requirements.

While the possibility of enforcement and the mandatory fines for polluting must be made clear, PSE recommends that the Stormwater Program develop a campaign strategy that emphasizes incentives rather than the threat of penalties for non-compliance.

The following are PSE's specific recommendations for developing an educational outreach program for mobile businesses.

Target Audience(s)

Mobile businesses provide the following services:

- Surface cleaning— including steam cleaners and pressure washers who clean sidewalks, plazas, parking areas, driveways, drive-throughs and building surfaces;
- Janitorial clean-up;

- Auto detailing/washing— which ranges from nationwide companies with fleet contracts to one-person operations operating out of a truck with a hose and bucket;
- Auto repair and oil changing;
- Carpet cleaning;
- Window washing;
- Pool cleaning and maintenance— which involves draining pool water into sewage systems or storm drains;
- Food catering;
- Sand blasting;
- Pet grooming;
- Commercial landscape maintenance and residential gardening;
- Restaurant floor mat cleaning; and
- Pavement cutting for utilities.

Based on the types of water pollution complaints received, at this time the Stormwater Program is interested in concentrating its outreach efforts on businesses that provide surface cleaning, pool cleaning and maintenance, and construction services. Over time, the Stormwater Program may target each mobile industry with educational outreach.

For most of the mobile industries listed above, the Stormwater Program can develop a database of established businesses by using trade association membership lists, local chambers of commerce, business listings in the local Yellow Pages, and customer surveys. For example, in addition to local listings, businesses in the construction industry can be reached by obtaining a list from the Southern California Contractors Association of the contractors conducting business in Orange County.

The Stormwater Program may also seek partnerships with vendors/retailers that supply equipment and products to these businesses. The terms of this partnership may include positive publicity from the Stormwater Program for those organizations that provide environmentally friendly products and that distribute the Stormwater Program's BMP materials to their customers.

But many businesses— such as mobile auto detailers and pool cleaners— are not well established, are not members of a business organization, and can obtain supplies at a wide variety of outlets. In fact, many of them can be considered “fly-by-night” operations because they are small and transient and may not survive long in a competitive market. Since such businesses do not use normal channels of advertising, it will take a more creative strategy to reach them with the BMP information. These smaller start-up businesses are most easily held accountable by educating the *customers* so that they do not permit polluting practices to occur on their property.

When targeting the mobile auto detailers that service downtown Los Angeles, the City of Los Angeles contacted all property and parking lot owners and managers with ordinance compliance information and materials for them to distribute to the detailers that operate on their property. For targeting the mobile pool cleaners, we recommend that the

Stormwater Program undertake an intensive outreach in those neighborhoods where residents are most likely to have pools.

This outreach should include handout materials that residents can give to the service provider outlining the BMPs that the residents expect the provider to implement. In addition, the Stormwater Program can furnish a guide that informs residents of the practices they should look for as the business representative conducts the service. The Stormwater Program may also wish to provide residents with a BMP checklist that they can return to the Stormwater Program after the service has been performed to indicate that compliance was achieved. Suggestions for these materials are discussed in detail in the incentive-based outreach program section below.

Involving Business Owners in the Development of the Program

As discussed in Section III, PSE recommends that the Stormwater Program conduct one-on-one telephone interviews— or focus groups— to develop the most accessible outreach materials and the most effective incentives for implementing the BMPs. The Stormwater Program can solicit comment on program elements from representative business owners, as well as from the manufacturers and suppliers of environmentally friendly equipment and supplies. By so doing, the Stormwater Program will gain a better understanding of industry-specific activities, potential pollutants, and the best ways to communicate the BMPs.

Armed with this knowledge, the Stormwater Program will then be able to:

- Develop a workable set of BMPs for each industry;
- Tailor the program to achieve optimal participation;
- Gain greater industry buy-in, since it will be an industry-developed program; and,
- Achieve the greatest possible reduction in stormwater pollution from the mobile business industry.

An Incentive-Based Outreach Program

The growing public awareness of pollution-related problems means that many customers now choose to patronize businesses that are perceived as operating in ways that do not harm the environment. The Stormwater Program can capitalize on this trend by creating a program that offers free publicity, thus greater visibility, to companies that employ the BMPs in all of their operations. The Stormwater Program can provide these businesses with publicity by including compliant businesses on a list provided through the Stormwater Program hotline, promoting outstanding businesses through the news media, and distributing marketing materials to businesses that adopt the BMPs. These incentives are described in more detail below.

This publicity will then enable customers to select businesses that protect them from liability at the same time that they protect the environment. Compliant businesses may thereby gain a wider customer base, while those that do not adopt the BMPs could fall out of favor— even if they offer their services at a cheaper rate— since they put their customers at risk of expensive fines.

Through the use of rewards for compliance, the Stormwater Program can indicate to mobile business owners that it is seeking to work in partnership with them rather than to impose additional, burdensome regulations that tax their resources. And since compliance with the BMPs may require that business owners adopt new, less convenient measures, purchase additional materials, and train their employees in new practices—these businesses deserve to be recognized and rewarded in ways that will help them prosper and will reinforce their allegiance to the program.

Incentive-based stormwater education programs for businesses are being implemented throughout California. The Bay Area Stormwater Management Agencies Association in Northern California has implemented such a program for surface cleaners. The City of Sacramento has implemented a similar program to reach carpet cleaners. The City of Los Angeles is in the midst of distributing BMP materials to mobile auto detailers and their customers.

Possible incentives for businesses to participate in the Stormwater Program's mobile business outreach program include:

- Stormwater Program certification— acquired through participation in a Stormwater Program-sponsored workshop (in person, via the World Wide Web or through direct mail). This type of program requires consistent follow-up/maintenance;
- Bumper stickers, truck stickers, and promotional materials that advertise compliance;
- Inclusion on printed and electronic lists of businesses that employ the BMPs;
- Mention in news releases, media advisories, and Stormwater Program newsletters;
- A camera-ready program logo that can be used on business letterhead and promotional material to indicate that the business operates in an environmentally friendly manner;
- Stormwater Program-prepared materials indicating compliance (with space for individual business identification) for distribution to customers after a service is rendered; and,
- Formal recognition by the County of Orange Board of Supervisors and/or city councils.

The Stormwater Program may seek to collaborate with other agencies in the County and cities that share similar goals in order to pool resources and reach the largest possible audiences. For instance, carpet cleaners that use the BMPs can be listed in a mailer that accompanies utility bills. In addition, the County and cities can include a requirement for use of designated BMPs when contracting with mobile businesses for these services.

Creating Attractive, Accessible and Memorable Outreach Material

By surveying the outreach materials developed for mobile business owners by other municipalities, the Stormwater Program can get a head start on creating its own materials. As stated, the use of focus groups can also help in the development of a memorable theme and attractive identity for the Stormwater Program's program.

By using a uniform look and recognizable identity, the Stormwater Program will be able to build public awareness of the program and will demonstrate its commitment to this

program. The name/theme can be used on all program materials, including fact sheets, brochures, decals, news releases and certificates.

The outreach material should employ colorful graphics and very simple grammar (in appropriate languages) to explain, in general:

- The problem of storm drain pollution;
- The benefits and requirements of the urban runoff pollution control ordinance;
- Reference to the potential economic benefits of participation; and,
- How-to information for implementing recommended industry BMPs.

For industry-specific BMP delivery, a separate fact sheet/brochure should be prepared for each industry to avoid confusion. Rewards for business compliance with the BMPs, and for customer participation in the monitoring process, should be explained in the materials directed toward these two groups.

PS Enterprises suggests that the Stormwater Program begin with an introductory mailing to owners of each of the mobile businesses consisting of a short sales-pitch with a “Yes, I want to learn more...” call, fax, e-mail or mail-in response card. This mailing will help verify the data in the mailing list.

In the second direct-mail packet, sent to businesses that return the response card (or the Stormwater Program can elect to do this as the initial mailing), the Stormwater Program should include a personalized cover (form) letter that thanks the respondent for their interest in protecting the environment.

The packet can contain the following material for the businesses and their customers:

- Fact Sheets on the legal requirements for the protection of the environment;
- A sheet outlining the recommended BMPs;
- A sample Pollution Prevention Voucher for the businesses to use;
- A sample Postcard for customers to complete and return to the Stormwater Program; and,
- The description of incentives for compliance.

Supporting and Monitoring BMP Compliance

Just as the outreach program needs to educate and inspire both business owners and their customers, the Stormwater Program’s follow-up activities to monitor and ensure compliance with the BMPs can also be focused on both groups.

Businesses will need help understanding how to implement the BMPs in a cost-effective manner. The Stormwater Program can address this need by providing (through its hotline) knowledgeable staff members to answer questions and address the concerns of business owners. This will also provide the opportunity for the Stormwater Program to learn from these business owners how their customers are responding to the program.

In addition, the Stormwater Program can provide businesses with a Pollution Prevention Voucher as part of its outreach materials. These vouchers can be completed by business

employees to indicate the type of surface cleaned, the cleaning method used, and the way in which waste water was disposed. Customers should be asked to sign the voucher to verify its accuracy. A copy of the voucher can then be given to the customer and a second retained by the business to show inspectors.

As previously mentioned, customers can also help provide verification of a company's adherence to the BMPs through a simple, prepaid response card that asks them to "check the box" to indicate which practices the business employed in the course of performing its service. The Stormwater Program can supply business owners with this form— to be mailed in by customers— along with the other printed material that it produces. To encourage use of this form, the Stormwater Program can:

- Award those businesses that generate the greatest number of favorable responses with more favorable placement on the promotional material that the Stormwater Program produces.
- Encourage customers to send in the form by letting them know they will receive stormwater magnets, stickers, and other "goodies" in return for their postcard.

These strategies will enable the Stormwater Program to motivate business owners to provide this educational survey to their clients. The customer response cards will then make it possible for the Stormwater Program to track the effectiveness of this activity and monitor business practices by calling customers at random to verify the validity of their response.

The Stormwater Program can also measure the program's effectiveness by tracking the number of reports of violations to the Stormwater Program hotline, as well as the number and nature of calls that ask questions or express concerns.

Conclusion

PS Enterprises recommends that the Stormwater Program create a positive, pollution prevention program that focuses on the carrot rather than the stick. The Stormwater Program can do this by offering incentives that make program participation beneficial to mobile businesses by publicly recognizing them for their active implementation of the BMPs. The Stormwater Program can coordinate its business recognition program with local chapters of business associations. It can also inform the public about compliant businesses by making lists available through the Stormwater Program hotline and promoting the availability of the lists.

PSE further recommends that the Stormwater Program invites representatives of each of the mobile businesses— plus their suppliers and customers— to participate in the process of developing and publicizing outreach materials. This will assure the creation of the most accessible and persuasive program materials and will gain early "buy-in" for the program from these groups.

In addition, business participants can inform the Stormwater Program of appropriate newsletters, associations, and other outlets through which to promote the program and can also supply the Stormwater Program with feedback as the program progresses.

Residents who participate in the design of the program— and who fully understand the importance of the BMPs to the preservation of the local environment— may help the Stormwater Program spread the word through schools, churches, and neighborhood associations. Happy customers will also provide invaluable word-of-mouth advertising for those mobile businesses that perform their services in environmentally responsible ways.