



August 13, 2014

Felicia Marcus, Chair State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
1001 I Street, 24th Floor
Sacramento, CA 95814
(Via e-mail to: commentletters@waterboards.ca.gov)

Re: Proposed Adoption of the Final Guidelines for the Drought Response Outreach Program to Schools (DROPS)

Dear Chair Marcus,

I am submitting these comments on behalf of Russian Riverkeeper based on our experience delivering our Clean Campus Clean Creeks program to local high schools since 2009. We deeply appreciate the proposed Drought Response Outreach Program to Schools opportunity to address both water quality and water quantity at state schools. Riverkeeper participated in a May conference call with SWRCB DFA staff as part of the program development.

The Clean Campus Clean Creeks program educates students about the problem and effects of polluted urban runoff and LID based solutions and student groups compete to apply LID solutions to stormwater pollution they find on campus. The program is innovative and deeply engaging of our student demographic of non-college track students who will be most likely to be constructing or managing LID facilities in their future work careers.

The Clean Campus program has had strong support from local school districts in the Russian River watershed, which suffers from nine impairing pollutants with stormwater being a major contributor. The Russian River watershed is also experiencing acute drought impacts in the current drought with some communities in the upper Russian River at risk for future water availability. The Russian River also suffers from deep incision and entrenchment due to decades of gravel mining and dams that has greatly reduced groundwater recharge. The Clean Campus program LID projects address both the impaired water quality and lack of potable water in portions of the watershed.

Based on our experience we'd like to make the following comments and recommendations:

- 1. Under Eligibility requirements, clarify what constitutes "member of a local watershed group" on page 3 since there is definition of watershed group in the draft guidelines**
- 2. Most LID project identification and design work would precede grantee selection, how can students be engaged in project ID, planning or design before education regarding drought and water pollution and LID is delivered so they can participate meaningfully?**
- 3. In order to engage students beyond "tokenism" level provide exceptions to providing detailed plans in Proposal Application C.1 Q5 Q6 so students can assist with project design and selection**

Detailed Comments:

1. Define Member of Watershed Group

Under the eligibility requirements all funding through Prop 13, the bulk of funding, requires membership in a Watershed Group. We recommend that a definition of "Watershed Group" be provided to make it easy for schools, which generally are not members of groups, to understand the requirements. Since there is also a strong effort to have schools, "partner with local watershed groups" and most water related NGO's have an education and outreach component we'd recommend that be emphasized. Partnering with City or Agency's often brings skills and resources but might be very weak on truly engaging the public, which is a program goal. Local NGO watershed groups by nature have to seek out publicity since they need to raise funds and there is less need for that with agencies and city's.

2. How can students engage in planning and design when most planning work would occur prior to student engagement?

Most school districts are short-staffed as you are likely aware even after backfilling of budgets in this fiscal year. By requiring fully designed projects event at concept level prior to proposal submission, it will be virtually impossible for students to engage meaningfully in planning and design as detailed in Student Participation section? Our Clean Campus program is built upon engaging students at a meaningful level by educating them about the problem of stormwater pollution and LID solutions before they are engaged with planning and design. It will be very difficult for students who have not had the education portion of DROPS delivered to engage in an informed way with project planning and design. We understand that due to time lines and dire need to deliver funds to address the drought some efficiency have to be incorporated. At the same time the Board needs to consider the value of educated future voters and citizens against the efficiency of the grant process and yes achieving higher value goals does require more effort!

By engaging the students on project selection, planning and design the students receive a far higher value education on the pressing water issues facing our state. At the same time this engagement in the planning and design provides valuable job skills in Green Building that we need to build into our students and future workers to meet our water challenges in the future. We strongly urge the Board to consider allowing education delivery to students to occur prior to full project conceptual design so that they can participate in a deeply engaged manner and maximize the educational benefit. Our Clean Campus program purposely engages students in the project identification and design to meet State Curriculum Standards for California Investigation and Experimentation Standards, Grades 9-12. To design project prior to educational delivery misses this opportunity and just engages LID consultants.

Our recommendation to the Board is to have some flexibility in Proposal Application questions C.1 Technical Questions to allow a less refined concept to be proposed to allow for student participation. If the application questions Q6 & Q7 could be modified for LID projects to allow for a very general project description such as, goal for gallons captured, what type of BMP bioswale, rain garden etc, potential areas for installation rather than more detailed information this would preserve the students ability to deeply engage on project identification, planning and design – that are the highest educational value.

We realize that for many possible grantees this allowance might be more speculative and are hoping that groups that have a track record of engaging students in project design such as our

Clean Campus program are allowed a bit more leniency on the C-1 Technical Questions based on our track record.

3. In order to engage students beyond “tokenism” level provide exceptions to providing detailed plans in Proposal Application C.1 Q5 Q6 so students can assist with project design and selection

In many communities youth and students feel disenfranchised from their communities, which leads to social problems. In Sonoma County the County Health Action Initiative has several programs to encourage youth participation as part of their community mental health program. As part of the **Cradle to Career** program we were provided the “ROGER HART’S LADDER OF PARTICIPATION” that was developed to detail various levels of engagement with youth and the result of each level. We are attaching this graphic below to inform the DROPS program guidelines and our previous comment on engaging youth to improve educational outcome and career preparation of students. Another attachment sums up information from Project or Place Based Learning Programs that reinforces the far greater educational outcomes from deeper and more meaningful engagement of students in the DROPS program project development. Our Clean Campus Clean Creeks program was built upon the principal that lasting educational benefits result from meaningful engagement.

Our Clean Campus program reaches Rung 6 of the ladder; **Adult initiated shared decisions with youth**, because students are engaged in project identification, planning and design. The current DROPS program design will necessitate most LID or other implementation project decisions will be made before students engagement or educational delivery occurs. This risks the student participation level to Rung 3, **Tokenism** where adults make decisions and students are consulted with minimal opportunity to affect project design since that must be performed prior to student engagement. After students complete Clean Campus program projects, they have gained an in-depth knowledge of not just the problem of water pollution and the need for water conservation but how to make it happen in their campus homes. They complete the program understanding how to apply LID strategies to reduce water pollution and increase groundwater recharge and have a deep engagement that better prepares them for the workforce and being part of the Green Building movement.

It is our hope that the Board will see the value in not excluding such higher value program designs such as Clean Campus through the proposal application process for DROPS. We realize it would be up to applicants to provide documentation and support that this approach is not only feasible but will result in meeting DROPS goals of measurably increasing gallons of stormwater captured and treated and increases in groundwater recharge.

We appreciate your consideration of our comments and SWRCB’s developing the DROPS program to provide more funding for addressing our water quality and quantity challenges in California.

Sincerely,

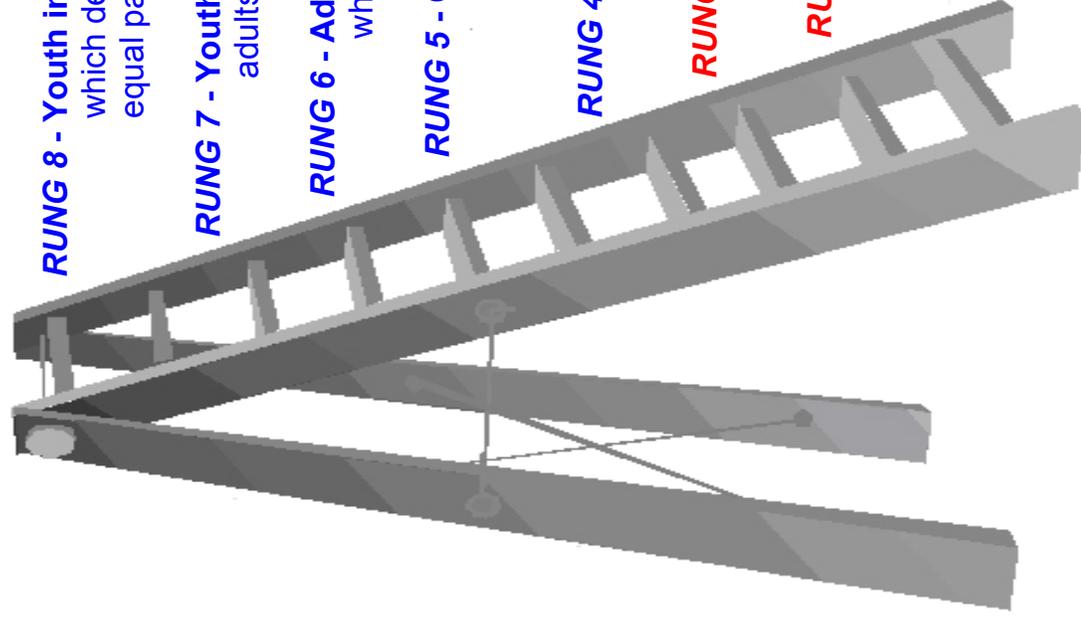


Don McEnhill
Executive Director

Atts: Roger Hart's Ladder of Participation. Adapted from Hart, R. (Children's Participation from Tokenism to Citizenship

Project Based Learning Outline and references, F, Herron, Russian Riverkeeper

ROGER HART'S LADDER OF PARTICIPATION



RUNG 8 - Youth initiated shared decisions with adults: Youth-led activities, in which decision making is shared between youth and adults working as equal partners.

RUNG 7 - Youth initiated and directed: Youth-led activities with little input from adults.

RUNG 6 - Adult initiated shared decisions with youth: Adult-led activities, in which decision making is shared with youth.

RUNG 5 - Consulted and informed: Adult-led activities, in which youth are consulted and informed about how their input will be used and the outcomes of adult decisions.

RUNG 4 - Assigned, but informed: Adult-led activities, in which youth understand purpose, decision-making process, and have a role.

RUNG 3 - Tokenism: Adult-led activities, in which youth may be consulted with minimal opportunities for feedback.

RUNG 2 - Decoration: Adult-led activities, in which youth understand purpose, but have no input in how they are planned.

RUNG 1 - Manipulation: Adult-led activities, in which youth do as directed without understanding of the purpose for the activities.

Project Based (Place Based) Education

Notes and quotations from published articles

Case for Supporting Clean Campus Clean Creeks Youth lead and inspired activities

“This report provides grant makers with insights into the multiple benefits of place-based education – better academic achievement, revitalized teaching, enhanced social development, stronger communities, and improved environmental stewardship”
(<http://watershedschool.org/downloads/AllofaPlace.pdf>).

“Placed based education is grounded in the resources, issues, and values of the local community. By fostering the growth of partnerships between schools and communities, placed based education works simultaneously to boost student achievement and improve a communities environmental quality and social and economic vitality” (PG17)

“Place-based educators posit that by grounding education in the local community, students can see the relevance of what they are learning and therefore become more engaged in the learning process” (18).

“A program evaluation conducted by researchers at the Harvard Graduate School of Education for the Rural Trust (1999a, 1999b), provides case studies of schools and communities throughout rural America that have been transformed by grounding students' education in the local community and intentionally moving away from didactic approaches to standardized schooling. The evaluation concludes that as schools and communities work together to design curricular goals and strategies, students' academic achievement improves, their interest in their community increases, teachers are more satisfied with their profession, and community members are more connected to the schools and to students” (18).

(http://www.peecworks.org/PEEC/PEEC_Reports/01795C87-001D0211.0/)

“Food and conservation science curriculum, net-zero design and student-based building performance monitoring have come together in the unique and innovative new Music and Science Building for Oregon’s Hood River Middle School. The school’s Permaculture-based curriculum both informed the building design and was also transformed through the integrated design process. The building both houses the school’s science program and acts as a teaching tool integrated into the curriculum. This project won the first 2030 Challenge Design Award, is one of the first net-zero K-12 projects completed in the country and is currently under review for LEED Platinum certification. **It offers a tangible demonstration of how decentralized energy and water systems, aquaculture, biological energy systems, year-round food production and performance monitoring can be incorporated in K-12 design and woven into school curriculum”.**

(<http://media.cefp.org/efp/EFP45-4Holser-Becker.pdf>)

Compiled by: Felicia Herron, Russian Riverkeeper