

WARMHOUSE BEACH DUMP SUPERFUND SITE, NEAH BAY, WA



Warmhouse Beach. Source: Triangle Associates

COMMUNITY INVOLVEMENT PLAN

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COMMUNITY INVOLVEMENT PLAN 10-24-16

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I. INTRODUCTION

Under the Federal Superfund program, the U.S. Environmental Protection Agency is performing a comprehensive environmental investigation and evaluation of potential cleanup options for the Warmhouse Beach Dump. The site is located on the Makah Indian Reservation, about three miles northwest of Neah Bay in Clallam County, WA.¹ The Dump has been used since at least the early 1970s for household and hazardous waste. It became a Superfund Site in December 2013 when EPA added it to the National Priorities List.

The unlined and uncovered waste extends to the headwaters of two streams (West and East Creeks). West Creek discharges to Warmhouse Beach, site of a traditional summer fishing camp and subsistence harvesting of sea urchins, mussels, and clams. Warmhouse Beach is also used for camping, surfing, and other recreational activities.

This Community Involvement Plan lays out how EPA will provide information and work with the community on the Warmhouse Beach Dump site, outlining outreach and engagement strategies to meet the following goals:

1. Encourage community interest, giving the public the information, tools, and opportunity to provide meaningful input into site cleanup decisions;
2. Share accurate, understandable and timely information in a manner considerate to the local culture and norms;
3. Foster open communication, responding to questions and concerns as they arise;
4. Respect and consider community and Tribal leaders' input and feedback on EPA's cleanup process and communication as it is carried out; and
5. Create and publicize opportunities for on-site training and employment to interested Tribal members during the cleanup period as resources are available.

¹ <http://go.usa.gov/3GuXA>

Producing the Community Involvement Plan for this site involved three visits to Neah Bay; community interviews with over 200 residents; and information provided by the Makah Tribal and EPA websites. Hearing from local people about how they want to be informed and involved helped to align the plan's design with community needs. EPA is committed to a transparent, constructive process with the Makah Tribal Council and community.

EPA welcomes input at any time on this Community Involvement Plan or the overall community engagement program. The plan can be modified as new



Photo: Cape Flattery is the most Northwestern point in the contiguous United States, and a key feature in the ancestral territory of the Makah Indian Nation. The area around the cape is surrounded by secluded beaches accessible by water or a treacherous descent along a rocky cliff. For thousands of years, Makah people have expertly navigated canoes in and out of these dangerous waters. Source: Triangle Associates

information and issues develop over the course of the investigation and cleanup of the site. Call or email one of the contacts below:

Contact Information

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Resources

Paper copies of the Superfund process documentation will be available at the repository located at the Environmental Division of Tribal Offices.

Warmhouse Beach Dump Superfund Website—<http://go.usa.gov/3GuXA>

II. Acronyms

ATSDR	Agency for Toxic Substance and Disease Registry, U.S. Department of Health and Human Services
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CIP	Community Involvement Plan
COC	Contaminant of Concern
EO	Executive Order
EPA	U.S. Environmental Protection Agency
MOU	Memorandum of Understanding
PAH	Polycyclic Aromatic Hydrocarbons
PA/SI	Preliminary Assessment/Site Investigation
PBDE	Polybrominated Diphenyl Ethers
PCB	Polychlorinated Biphenyl
RD/RA	Remedial Design/Remedial Action
RI/FS	Remedial Investigation and Feasibility Study
ROD	Record of Decision
VOC	Volatile Organic Compound

III. COMMUNITY PROFILE

a. History of Makah Tribe and Neah Bay²

Historically, the Makah Tribe was comprised of five winter villages (Waatch, Sooes, Deah, Ozette and Bahaada), with a total population of 2,000-4,000 people. The villages are located on the Northwest point of the modern continental United States along the shores of the Pacific Ocean and Strait of Juan de Fuca. During the summer, Makah tribal members traveled to various camps closer to fishing, whaling and gathering areas. Warmhouse Beach is one such camp.

Makah villages were composed of extended families living in large, cedar plank longhouses. Cultural information was vested within these families, including: songs, dances, and stories owned by the family; land and ocean resources; and inherited cultural privileges, or “tupat.” In the 1700s, thousands of Tribal members died from epidemics of smallpox, tuberculosis, influenza and whooping cough because of indirect contact with Europeans. In 1852, shortly before the Treaty of Neah Bay, successive outbreaks of smallpox reduced the population of the southern-most villages. These deaths created large gaps in extended family units. Because songs, dances and stories could only be performed by specific families or individuals, the loss of these Tribal members disrupted the sharing of traditional knowledge and ways of life.

In 1855, the Treaty of Neah Bay between the United States government and the Makah Tribe established the Makah Indian Reservation. The Reservation, approximately 42 square miles, lies at the Northwest point of the Olympic Peninsula in Washington State. Neah Bay, the central village within the Reservation, is approximately 2.5 miles from the Warmhouse Beach Dump Superfund site.

Under the Treaty, the Tribe ceded approximately 300,000 acres of its native lands. The Tribe reserved its rights to gather, hunt, fish, whale, and seal from the ocean, waters, and uplands of the Reservation and surrounding area to meet its cultural, subsistence and other needs.

2 Makah Cultural and Research Center 2003. <http://makah.com/makah-tribal-info/>

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b. Demographics³

Neah Bay is a census-designated place (CDP) on the Makah Reservation in Clallam County, Washington, United States. In 2000, Makah Tribal members numbered 1,704⁴. Today, there are roughly 1,000 living in and around Neah Bay, not exclusive to Tribal members.

c. Tribal Governance Structure⁵

The Makah Tribal Council is the elected governing body of the Makah Tribe on the Makah Reservation in Neah Bay, Washington. Neah Bay is the central village of the Makah Reservation. The Makah Reservation is located on a portion of the Tribe's aboriginal lands as a result of land cessions made in the 1855 Treaty of Neah Bay, which was ratified by the U.S. Senate in 1859. The Makah Tribal Council operates under a Constitution and Bylaws dated May 16, 1936. Serving the Makah Tribal Council is the Makah Tribal organization, consisting of employees and a managerial level staff of directors under a General Manager. Elections for Tribal Council are held annually and each elected council member serves a staggered three year term. The Tribal government's daily administration is managed by the General Manager. Each program director reports directly to the General Manager.

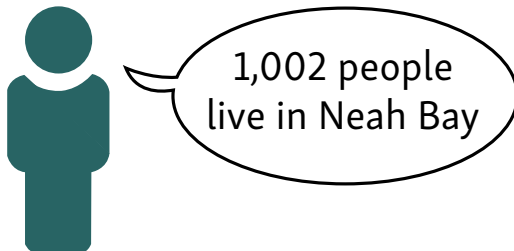
3 2010-2014 American Community Survey 5-Year Estimates and 2010 Census.
<http://factfinder.census.gov/>

4 Census 2000 American Indian and Alaska Native Summary File (AIANSF)
<http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

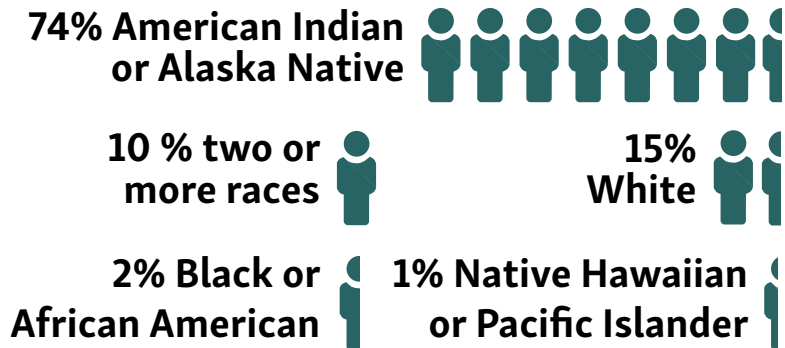
5 Excerpted verbatim from Makah Website. www.makah.com

COMMUNITY DATA FOR NEAH

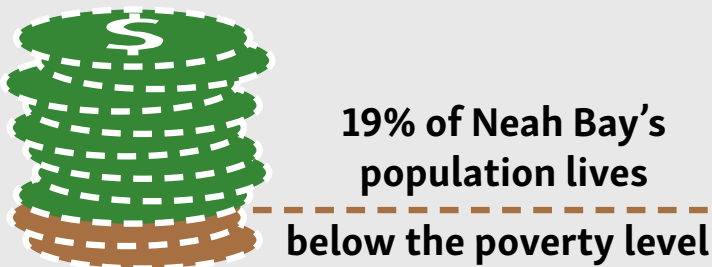
TOTAL



RACE

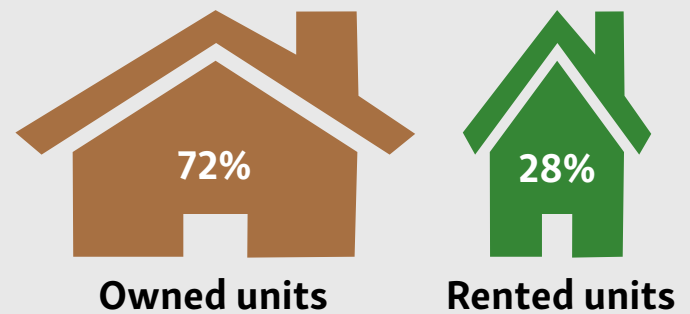


POVERTY



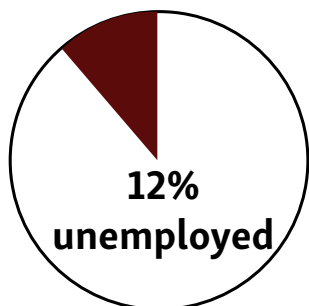
In WA, 13% lives below poverty level

HOUSING



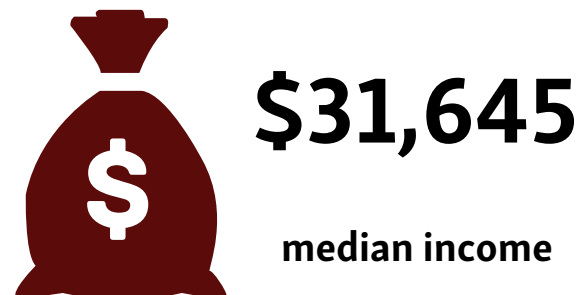
In WA, 62% of units are owned; ~38% are rented.

EMPLOYMENT



In WA, the unemployment rate is 4%

INCOME

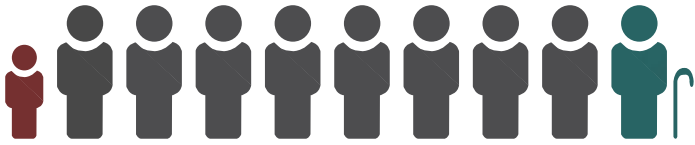


In WA, the median income is \$61,366

**Data collected from the 2014 American Community Survey; Data includes non-Tribal members*

MAKAH BAY*

AGE

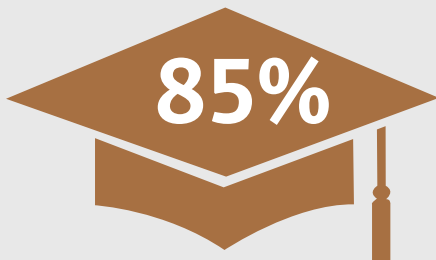


10% is under 5 years old

11% is 65 years or older

*In WA, 6% is under 5 years;
13% is 65 years or older*

EDUCATION



High school graduate or higher

In WA, 90% graduated from high school

TOP OCCUPATIONS



**Management,
Business,
Science, &
Arts**



**Natural
Resources,
Construction, &
Maintenance**



Sales



*Photo: Makah beaches provided a place
for social, subsistence and ceremonial
activities, as well as canoe landings
and launch sites, circa 1910.*

Source: Asahel Curtis

IV. WARMHOUSE BEACH DUMP SITE INFORMATION⁶

The 7-acre Warmhouse Beach Dump is an open dump located entirely on tribally owned trust land above Warmhouse Beach on the Strait of Juan de Fuca. This land was cleared in a 1966-67 timber harvest and the dump opened in the early 1970's (no later than July 1972). The dump closed in October 2012 when the Makah opened the Makah Transfer Station.

Records indicate that multiple parties used the dump. Available information shows the U.S. Air Force used the site to dispose of household and hazardous waste until the Makah Air Force Station closed in 1988. These reports also disclose that the U.S. Air Force disposed of paint cans, paint, paint thinner, pesticides, lubricants, waste oil, asbestos-containing materials, and sewage sludge at Warmhouse Beach Dump.

The Makah Tribe referred the site to EPA due to concerns about contaminants from the site affecting surface water and shell fishing beaches on the reservation. Small creeks drain the western, northern and eastern slopes of the dump. The southern part of the dump's drainage is in a former ravine flowing into East and West Creeks. West Creek and an unnamed stream on the northwestern part of the dump flow to Warmhouse Beach. East Creek, discharges to Kydikabbit Creek, which empties onto East Beach, just west of the Kydikabbit Point.

Contaminants found in soil at the Warmhouse Beach Dump include metals, dioxins, polychlorinated biphenyls (PCBs), perchlorate, polycyclic aromatic hydrocarbons (PAHs), and pesticides. Contaminants found in sediment in nearby creeks include metals, dioxins, PCBs, pesticides, and PAHs. Contaminants found in surface water in nearby creeks include metals, perchlorate, PAHs, and volatile organic compounds (VOCs). East and West Beach sediment, mussels and animals may have been impacted by releases from the dump.

⁶ *National Priorities List: Makah Reservation Warmhouse Beach Dump. December 2013. Preliminary Assessment Report: Makah Reservation Warmhouse Beach Open Dump. TechLaw, Inc. November 2010. Site Inspection: Makah Reservation Warmhouse Beach Dump. Ecology and Environment, Inc. April 2012. Technical documents are available online at <http://go.usa.gov/3GuXA>*

(PAHs), and pesticides. Contaminants found in sediment in nearby creeks include metals, dioxins, PCBs, pesticides, and PAHs. Contaminants found in surface water in nearby creeks include metals, perchlorate, PAHs, and volatile organic compounds (VOCs). East and West Beach sediment, mussels and animals may have been impacted by releases from the dump.

Releases from wastes disposed of at Warmhouse Beach Dump appear to be the source of contamination in its soil, sediment, and surface water, possibly impacting people and cultural and ecological resources. The waste is also a physical threat to pedestrians.

In response to a petition from the Tribe, EPA added the Warmhouse Beach Dump to the Superfund National Priorities List in 2013. EPA's Superfund program has started the Remedial Investigation/Feasibility Study (RI/FS) phase of assessing and addressing contamination at the dump.

The Superfund RI/FS process identifies the nature, extent and migration of site contaminants (i.e. which contaminants are present, in what concentrations and locations within or off the site). Looking at the concentrations of these contaminants assesses unacceptable risks to people's health and the environment, and identifies potential cleanup alternatives.

Polychlorinated Biphenyls (PCBs) belong to a broad family of man-made organic chemicals known as chlorinated hydrocarbons that do not readily break down once in the environment. PCBs have been shown to cause cancer, as well as a number of serious non-cancer health problems in animals, including: effects on the immune system, reproductive system, nervous system, endocrine system and other health impacts.⁷

Polycyclic aromatic hydrocarbons (PAHs) are a class of chemicals that occur naturally in coal, crude oil, and gasoline. Several PAHs and some specific mixtures of PAHs are considered to be cancer-causing chemicals.

For more information on common contaminants found at Superfund sites, visit <https://www.epa.gov/superfund/contaminants-superfund-sites>

⁷ Learn about Polychlorinated Biphenyls.

<http://epa.gov/superfund/community-involvement-tools-and-resources>

SUPERFUND CLEANUP PROCESS



**MAKAH
TRIBAL
COUNCIL**



National Priorities List

- List of contaminated sites in the US



Remedial Investigation

- Find out nature and extent of contamination.
- Assess risks to people and environment.



Feasibility

- Describe possible alternatives
- 9 evaluation criteria

ATSDR



Public

- Evaluation

time frame

| 2013

| 2016



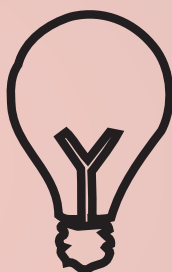
Community Involvement Plan

- EPA documents best ways to get information about the site to the community and records community concerns about the site.



Feasibility Study

Describe and compare
cleanup
alternatives using EPA's
evaluation criteria.



Proposed Plan

- Present EPA's preferred cleanup option.
- Hold formal public comment period.



Record of Decision

- Issue cleanup decision.

Remedial Action

- Carry out site cleanup.



Public Health Assessment

Identify potential risks to public health

V. SUPERFUND OVERVIEW AND PROCESS

A. Superfund Process

EPA's Superfund program is responsible for cleaning up some of the nation's most contaminated land and responding to environmental emergencies, oil spills and natural disasters.⁸ The section below provides a general description of steps in the Superfund process, from initial investigations through removal of the site from the National Priorities List. A Community Guide to EPA's Superfund Program is available online at: <https://semspub.epa.gov/work/HQ/175197.pdf>.

1) Site Discovery

The first step in the Superfund process is called Site Discovery. This term applies to all of the different ways that EPA becomes aware of the need to consider a site for cleanup. The Makah Tribe referred the site to EPA due to concerns about contaminants from the site affecting surface water and shell fishing beaches on the reservation.

2) Preliminary Assessment/Site Investigation (PA/SI)

Following Site Discovery, EPA reviews any existing information, including prior sampling results, in a step called the Preliminary Assessment. This is followed by a site visit or additional sampling, called the Site Investigation. EPA completed the Preliminary Site Assessment Report in 2010.

3) National Priorities List (NPL)⁹

The NPL is the Superfund list of high-priority hazardous waste sites across the nation, identified for cleanup. The NPL is intended primarily to guide EPA in determining which sites warrant further investigation. EPA received a letter of support for placing the Warmhouse Beach Dump on the NPL from the Makah Tribe, which confirms the Tribe considers its cleanup its highest environmental priority. EPA added the site to the NPL in 2013.

⁸ <https://www.epa.gov/superfund>

⁹ *National Priorities List: Makah Reservation Warmhouse Beach Dump*. December 2013. <https://semspub.epa.gov/work/10/501000026.pdf>

4) Coordination and Involvement with the Tribe

In order to support Tribal participation in the Superfund process, a Memorandum of Understanding (MOU) is established between EPA and Makah Tribal Council. The MOU details how the Tribe and EPA shall coordinate on a government-to-government basis in their efforts to meet their respective responsibilities under Superfund and other applicable Federal or Tribal law to address the releases or threatened releases of hazardous substances associated with the site.

For example, the MOU requires that EPA coordinates review of Superfund documents with the Makah Tribe, and responds to Tribal input throughout the Superfund process. Additionally, EPA and the Makah Environmental Department have regular meetings to discuss the ongoing Superfund work.

5) Community Involvement

Engaging the community early on and in a meaningful way is critical to EPA's Superfund process. After the site is listed on the NPL, EPA conducts stakeholder interviews and discussions to help understand the unique concerns and issues about the site, and how to get information to, and input from, the community. This information informs a Community Involvement Plan (CIP) which organizes and guides EPA's public participation efforts. The CIP is a "living document" which is typically updated after the site cleanup decision, or the Record of Decision (ROD), is issued. Community involvement is tailored to meet the community's needs and is ongoing throughout the Superfund cleanup process. Input will help design a cleanup that considers community needs and interests.

6) Remedial Investigation & Feasibility Study (RI/FS)

Following NPL listing, EPA designs a complete investigation of the site, characterizing both the area affected and to what depth, and the types and concentrations of contaminants. This usually involves a significant soil, surface water, groundwater, and/or biota sampling process, often with multiple sampling events.

The Remedial Investigation includes a risk assessment. Superfund risk assessments characterize the current and potential threats to people's health and the environment posed by contaminants at the site. The risk assessment

addresses the unique contaminants, and the existing pathways of exposure at the Superfund site. The risk assessment also estimates current and future harm if no cleanup actions are taken. Superfund's risk managers use risk assessment information, along with other site factors, to determine if site risks are high enough to warrant cleanup, and if so, to select the best cleanup strategies to manage risks to acceptable levels.

Once the extent of contamination is documented, and risk to people's health and the environment is understood, EPA develops scenarios to address unacceptable risk, which includes the presumptive landfill remedy, as well as a total removal alternative as requested by the Makah Tribal Council. The tools, techniques and processes are then organized into alternatives and evaluated using established criteria, including protecting people's health and the environment, compliance with Tribal and federal laws and regulations, ease of implementation, cost, and time to reach cleanup goals.

ATSDR Public Health Assessment

Within three years of listing, the Agency for Toxic Substances and Disease Registry (ATSDR), a federal Public Health Agency under the U.S. Department of Health and Human Services, is required to provide an assessment of health priorities related to the site. During the RI, ATSDR participates in reviewing the data collection process and results evaluating exposures and potential health issues. If a concern arises, ATSDR may recommend actions to protect public health. In addition to working with the community to understand concerns, ATSDR will also work collaboratively with the Sophie Trettevick Indian Health Center to gather concerns heard by health care providers and provide helpful health messages.

7) Proposed Plan (PP)

A Proposed Plan is a technical document posted on EPA's web page, and sent to EPA's mailing list upon request. EPA writes a plain-language fact sheet summarizing the Proposed Plan, which is distributed to the community. The Proposed Plan summarizes the findings of RI/FS, compares options to address site contaminants, identifies EPA's preferred alternative, and explains how to provide public comments.

8) Record of Decision (ROD)

The cleanup method ultimately chosen for the site, and the reasons for the selection, are set forth in the Record of Decision (ROD). The ROD is a public document which explains EPA activities prior to selection of a cleanup method, and describes how the cleanup method will be protective of people's health and the environment. It also contains the responsiveness summary and shows how those comments were factored into the final decision.

9) Remedial Design (RD)

Remedial Design (RD) is the development of engineering drawings and specifications for a site cleanup. This phase follows the remedial investigation/feasibility study.

10) Remedial Action (RA)

Remedial Action (RA) is the building of treatment facilities, removal of waste piles, containment of contamination, implementation of institutional controls or other action that completes the cleanup decision. This phase includes the testing and certifying of any facilities in operation.

11) Five Year Review

This is an analysis prepared every five years to determine if site remedies remain protective of people's health and the environment. Prior to the Five Year Review process beginning, the community is notified and asked to provide information about the operations of the current remedy, and issues and concerns that have arisen. When the Five Year Review report is complete, the community is notified of the results.

12) Delisting

When a site has met its cleanup objectives, it can be removed from the National Priorities List (NPL or the Superfund List), at which point the public is notified and a comment period is held.

Paper copies of documentation regarding the Superfund process will be available at the repository located at the Environmental Division of Tribal Offices.

Warmhouse Beach Dump Superfund Website—<http://go.usa.gov/3GuXA>

B. Opportunities for public input

EPA is committed to meaningful community involvement throughout the Superfund cleanup process. EPA values and respects the Makah Tribal Council and community input, and strives to be clear, transparent, and culturally sensitive in communications. EPA welcomes questions and ideas at any time during the cleanup process – see Contact Information on Page 3.

The main milestone for gathering and responding to public input is EPA's formal public comment period on the preferred cleanup alternatives for the site, called the Proposed Plan. Typically, the Proposed Plan public comment period runs 30 days, and can be extended upon request. During the public comment period, EPA holds a formal public meeting to take verbal and written comments. At the end of the comment period, the agency carefully considers and responds to all comments. EPA's responses are documented in a Responsiveness Summary, which is issued at the same time as the cleanup decision, called the Record of Decision. These documents will be available to the community.

EPA will tailor community engagement activities to the community's needs as much as possible. Some examples would be: holding meetings with the Makah Tribal Council and the broader community to distribute information on risk pathways found at the site, updates on results from sampling events, holding Community Dinner presentations or Q&A sessions on the Superfund process and/or cleanup progress, and identifying and acting on other opportunities as they arise.

For further information on EPA's Environmental Justice Policy for Working with Recognized Tribes and Indigenous Peoples, contact:

Running-Grass

Regional Environmental Justice Coordinator

U.S. EPA, Region 10

Office of Ecosystems, Tribal and Public Affairs

grass.running@epa.gov

(206) 553-2899

C. Fostering Environmental Justice

Under Executive Order (EO) 12898, EPA is directed to identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law.¹⁰ EPA's strategy to integrate environmental justice (EJ) into all of its programs is outlined in its Environmental Justice 2014 and 2020 Action Agendas.¹¹ Through these strategies, EPA will cultivate strong partnerships to improve on-the-ground results, achieve better environmental outcomes and reduce disparities in the nation's most overburdened communities.

The Community Involvement Plan is one of the means by which EPA aims to support environmental justice with Tribes and indigenous peoples. In accordance with EPA Policy on Consultation and Coordination with Indian Tribes, EPA has consulted with the Makah Tribal Council on a government-to-government basis regarding significant decision points during the Remedial Investigation and development of the Community Involvement Plan.¹² Throughout the development of the Community Involvement Plan, EPA has followed recommended communication methods, and has sought to understand cultural and communication differences in order to establish common understandings of, and opportunities to address, environmental concerns.

10 *Executive Order (E.O.) 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. 1994.

<https://www.epa.gov/laws-regulations/summary-executive-order-12898-federal-actions-address-environmental-justice>

11 *Environmental Justice 2020 Action Agenda*.

<https://www.epa.gov/environmentaljustice/ej-2020-action-agenda>

12 *EPA Policy on Consultation and Coordination with Indian Tribes*. 2011.

<https://www.epa.gov/sites/production/files/2013-08/documents/cons-and-coord-with-indian-tribes-policy.pdf>

VI. Community Issues and Concerns

To better understand the community, culture and concerns, EPA contractors collected community feedback on the Warmhouse Beach Dump site and EPA process through a series of interviews and open house events. EPA representatives, contractors, and Tribal representatives conducted interviews in Neah Bay in December 2015 through February 2016. Interviews and discussions were held as one-on-one informational meetings in Q & A format. Interviews were conducted on several occasions in order to collect information from a broad range of residents in Neah Bay.

- Open house/dinner;
- Online survey (22 respondents);
- In-person interviews with community residents (188 respondents, including homebound elders); and
- Outreach Table at Makah Days 2015 (40 respondents)

A large number of respondents had knowledge and first-hand experience of the Warmhouse Beach Dump. The area around the dump was used to harvest food such as berries. Some interviewees said they found items in the dump for personal use or resale. Many respondents knew about it from being taken there as children or going up there themselves to use the dump when it was open. Many of those who were introduced to the dump as children continued to make use of it well into their adult years. They referenced the toxic and household materials dumped there, as well as fires that frequently occurred there, either spontaneously or intentionally lit to reduce the volume of the dump. Elder residents had the most anecdotal knowledge about the dump, while others stated that the dump has not been a point of conversation since it closed several years ago, and they had not heard about concerns from other community members.

What the Community Told Us

Public Health

The main concern people voiced was contamination of air, soil, plants, water, and terrestrial/avian/marine life surrounding the dump. Community members are concerned about people being exposed through eating foods harvested from the area, and direct exposure from visiting the area. Because many Tribal members identify deeply with the local ecosystem, wildlife and natural resources, there was also concern about contamination of the coastal environment at large, and the cultural and health implications for future generations.

Respondents reported that materials known to be dumped at the site included: toxic materials, cars, paint, ammunition, household waste, oil, asbestos, washing machines, refrigerators, dead animals, batteries, tires and needles. They expressed concern about resulting contamination of groundwater, soil and shellfish beds, as well as public health hazards related to asbestos, smoke from fires and live ammunition. Exposure to contamination would worsen existing public health problems such as asthma. Most Tribal members prefer to have the dump completely removed.

Economic Development and Education

It was apparent that people value the economic development potential of cleanup activities. Many people wanted to know about job training and employment opportunities related to the Superfund cleanup process. There was also interest in integrating an educational component, such as using the cleanup process as an opportunity to teach young people about proper waste disposal, remediation, restoration, and related technical skills. There was a strong focus on targeting the younger generation to get involved in the cleanup process as an example of environmental stewardship.

Community members are interested in opportunities for training, education and local jobs, targeting youth and young adults in particular. This strategy was stressed as a high priority in interviews with community members. People want a robust local economy with well-paying jobs and opportunities for development. People are proud of the Makah Tribe's rich cultural heritage and history, and want to continue the legacy of environmental stewardship.

Consider Impact on Tourism

Tourism is a leading source of commerce and employment for the area. People are concerned that public communication and news about contamination from the dump would have a negative impact on tourism near Warmhouse Beach and Neah Bay, and disrupt the business generated by angling, shell fishing, surfing and other recreational attractions. There was also concern that road blockages during construction would limit access to campsites, fishing areas and recreation areas.

Community members asked EPA to consider the potential community perception of the content and delivery method of information and how these may effect community livelihoods and businesses. It is also requested that EPA use care and discretion when distributing information beyond the Tribal community: some community members preferred that any dump site information stay local, rather than being posted in papers or on news sites, so that news of the dump does not negatively affect tourism.



Photo: Warmhouse Beach Dump. Source: Makah Tribe

The Cleanup: Methods and Process

People expressed a wide range of concerns about cleanup methods—the decision about which cleanup alternative(s) to pursue, the cleanup process, and follow up afterward. Some respondents were concerned about “capping” the dump, which they felt would leave hazardous waste in the area and might result in persistent contamination over time. There was also concern about the dump sliding into the ocean as it is close to the cliff edge. Because rats were frequently seen at the dump, respondents were concerned that rats might migrate from the dump to residential areas, and suggested that preventative strategies be taken as a part of cleanup activities.

There were also concerns expressed about the effect of cleanup activities on traffic and road access, tourism and air quality. Respondents also emphasized the importance of proper training and protective gear for workers exposed to the site, safe disposal of hazardous materials including ammunition, and ongoing monitoring to test for any persisting contamination or public health risks.

Makah Tribal Council requested and received resolutions from the Affiliated Tribes of Northwest Indians (ATNI) and the National Congress of Americans (NCAI) in support of the Tribe’s goals for the site.

Cultural Preservation

Because cultural artifacts were reported at the site, many indicated that cleanup activities should include methods for the recovery and preservation of fossils and archaeological and cultural artifacts that might be found at the dump.

Some people recommended that the area be restored to its natural state before its use as a dump. People felt this restoration is critical for ecological health, and is a way of preserving cultural practices and the legacy of environmental stewardship. From their perspective, ecological health includes the health of botanical and marine organisms, and small and large land mammals.

Responsibility and Accountability

Community residents and the Makah Tribal Council inquired about the decision-making process for determining the appropriate cleanup alternative, and the financial responsibility for cleanup and long-term management. Another

common question related to the schedule and how long the cleanup would take, and whether the cleanup would be supported and funded through completion and ongoing monitoring. Some asked about the objectivity, accuracy and comprehensiveness of data collection and analysis. People have concerns about the long-term implications of the dump, cleanup actions and transparency.

Meaningful Involvement

In order for the public to provide meaningful input on the Superfund process, and particularly on the Proposed Plan when it is opened to Public Comment, community members should be informed throughout the process. For example, EPA should distribute information about significant decisions, studies or actions early on, allowing ample time before carrying out any actions. EPA should continue to coordinate closely with the Tribe's Environmental Project Manager. This has two outcomes: 1) the public has the context, information and understanding from which to provide informed, effective comments, and 2) the process honors the importance of community members and the significance of the dump to public health.

Because many community members lack access to internet or are homebound, communications to address the concerns and issues described above will require particular attention and investment of time, innovative communication strategies specific to Neah Bay, and reaching out in accordance with the communication preferences listed below.

VII. COMMUNICATION METHODS

EPA plans to act on the recommendations from the community, as appropriate, documented in this Community Involvement Plan. The community's preferences will guide how to prepare and distribute information on the Warmhouse Beach Dump Superfund site cleanup. For example, EPA will continue to meet regularly with the Tribe's Environmental Project Manager and Makah Tribal Council and will be open and transparent regarding project findings, status, and schedule. This includes updates on sampling events and findings about risks to people, animals, and marine life.

Based on the interviews with local residents, EPA will direct communication about the Superfund process, studies and cleanup actions toward those stakeholders whose livelihood and health are most affected. Interviews identified a number of key stakeholder groups including:

- Tribal Elders and residents using the area for sustenance harvest of plants, fish and shellfish;
- Residents and visitors engaging in recreational angling and shell fish harvesting;
- Visitors such as surfers, tourists and campers; and
- Residents from nearby towns such as Sekiu and Clallam Bay.

Frequent Communication

EPA will communicate about the site consistently throughout the process, and not just during peak times of activity. This is so residents can be aware of the activities in their area before they occur.

Distribution of Information in Print

EPA understands that respondents want information to be sent directly to them by mail. The majority of those interviewed stated that they would like general information, some technical information, and information on how to access technical reports if they decided they wanted to. Several respondents stated that fact sheets would accomplish this goal. Others stated that sending general information, while making technical information available in paper copy somewhere local would be another solution. EPA will provide information via:

- PO Box mail: Many residents have Post Office Boxes, to which EPA can distribute printed communications for a fee;
- Whale Tale: EPA will provide information via this community newsletter available locally in print; and
- Fact sheets: EPA will provide 1-4 page documents which summarize larger technical documents, written in clear, non-technical language with explanatory graphics. Fact sheets include EPA contact information and refer readers to online resources for more detail.

Flyers, Updates and General Information¹³

EPA will provide information for the public via flyers posted at:

- Bulletin Boards at Tribal Council Offices, including Environmental Department
- Tribal Gym Reader Board
- Washburn's General Store
- Makah Mini Mart
- Warmhouse Diner
- Senior Center
- The Wellness Center, part of the Sophie Trettevick Indian Health Center
- Post Office
- Hobuck Cabins
- Big Salmon Fishing Resort
- Churches: Makah Lutheran, Assembly of God, and Makah Presbyterian
- Alcoholics Anonymous/Narcotics Anonymous meetings
- Community Center in Sekiu
- Signs near Warmhouse Beach and Dump: Because the area around the dump is frequented by residents, tourists and surfers, respondents suggested communicating risks and updates on the cleanup activities by posting signs in the area.

Information Available Online

EPA understands that Makah Reservation residents have inconsistent access to the internet. Interview respondents emphasized the importance of not relying on email or technology as a primary means of communication with local residents.

¹³ *Posting information at these locations is an opportunity to verbally share information with proprietors of the bulletin or kiosk, as well as passersby, and to ask for recommendations of locations to post or distribute information.*

Internet access is available at the Tech Center and, most commonly, by personal cell phones.

Similarly, many Elders, residents and highly respected members of the community are home-bound, and therefore lack access to information that is not shared directly with them by word of mouth. For this reason, EPA will communicate critical steps in the Superfund process and cleanup actions in-person and in-print.

In addition to in-person and in-print communications, EPA will provide online information via:

- Social Media;
- Makah.com: and
- Makah Portal (Makah.org): This portal is intended to serve as a medium to quickly and securely disseminate pertinent, useful information to members of Makah Tribe.

In-Person Communication

EPA understands that in-person communication is often the most impactful means of communication and aims to do so for key milestones in the project, which may include:

- Community meetings and dinners in Neah Bay;
- Ask Tribal members and staff to inform friends and family by word of mouth;
- Presentations at the Senior Center; and
- Meetings with Tribal Council.

Prospective Locations for Meetings

EPA received recommendations for meeting locations from community members including:

- Makah Tribal Center;
- Tribal Gym;
- Makah Cultural and Research Center; and
- Makah Marina Conference Room.

Outreach Opportunities at Community Festivals and Events¹⁴

EPA will staff a booth at community festivals and events as appropriate to communicate about key updates in the Warmhouse Beach Dump Superfund site cleanup process, have discussions with community members, and distribute information on human and environmental health. Events that EPA may host a booth at include:

- **Eagle Festival** – A late April event heralding the arrival of the bald eagles when they pair off and build their nests.
- **Halibut Hook-up** – Occurs during the early part of the halibut season in May.
- **4th of July**
- **Makah Days** – A three-day event held on the weekend closest to 26th of August.
- **Hobuck Hoedown** – First weekend in October.

Outreach Opportunities via Groups, Leaders, and Organizations

Community members interviewed offered civic/service clubs, churches and other organizations as a method to get information to the community. As needed, EPA will utilize:

- Churches (Makah Lutheran, Assembly of God, and Makah Presbyterian);
- Makah Tribal Council meetings;
- Narcotics Anonymous/Alcoholics Anonymous meetings;
- Senior Center staff; and
- Neah Bay Chamber of Commerce.

14 <http://www.neahbaywa.com/festivals.htm>

Distributing Communications to the Broader Community

EPA understands that due to the importance of tourism and related businesses to the local economy, communication methods, wording and content should carefully consider the perception of news about the dump, and the potential impacts on the community.

Many community members referenced TV stations, radio stations and local papers as sources of information, but few stated that they actually frequent these sources or use these methods as a reliable source of information themselves.

To ensure broader information sharing, EPA will utilize:

- Forks Forum: Local weekly newspaper covering the news of the West end of Clallam County, available online at forksforum.com;
- Peninsula Daily News;
- Q13 Fox;
- Forks 1490 Radio;
- Fact Line; and
- Port Angeles Evening News.

EPA welcomes input at any time on this Community Involvement Plan or the overall community engagement program. Call or email one of the contacts listed on page 4.

