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OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

OWSER Directive #9230.0-20

MEMORANDUM

SUBJECT: Innovative Methods to Increase Public Involvement in Superfund Community Relations (Superfund Management Review Recommendation #43.A)

FROM: Henry L. Longest II, Director
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TO: Director, Waste Management Division,
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Region IX
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Purpose: To discuss and present innovative techniques for increasing public involvement in Superfund Community Relations.

Background: The Superfund Management Review found that citizens question whether they actually influence EPA's decisions regarding Superfund sites. Many citizens believe EPA's community relations program is just "sophisticated public relations" and not a program to involve citizens in the decision-making process.

Although Superfund is improving in its efforts to listen to citizen concerns, and where applicable, to incorporate them into site decisions, there still is room for more improvement. Rather than merely acknowledge and occasionally utilize citizen input, Superfund should actively encourage such participation. Superfund must go beyond that which is required, and establish new and creative methods of community outreach.

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Implementation: The six techniques described below have proven effective in increasing public involvement in the Superfund process. While some are recent innovations, others were developed many years ago, but new and better ways of using them have bolstered their effectiveness. The list does not pretend to be exhaustive. Instead, it shows some of the outreach vehicles Regions have found to be particularly effective in encouraging citizen participation. Regions should make every effort to integrate as many as possible of these activities into the cleanup process.

1) **Citizen Work Groups:** Since the mid 1980s, citizen work groups -- also known as technical information committees, citizen information committees, or community work groups -- have been established at sites across the country. Widely recognized as one of the best mechanisms for increasing public involvement in the decision-making process, citizen work groups are structured organizations for the discussion and exchange of information between decision-makers and the affected public. Work groups have become more widespread and sophisticated as people realize their effectiveness.

Citizen work groups generally consist of State and local officials, representatives from community groups, and EPA staff including at least the Remedial Project Manager (RPM) and the Community Relations Coordinator (CRC). The size of the group and the number of meetings it holds depends on the public's interest in the site, activity at the site, and material to be reviewed.

A successful citizen group does not guarantee agreement about technical issues, nor does it eliminate controversy between citizens and EPA. Regions state that successful work groups help EPA identify and understand community concerns that are important to address during the cleanup process. The groups also give citizens an opportunity to gain a better understanding of the complexity of the cleanup process, as well as the technical aspects of the remedial alternatives available. Armed with this kind of technical knowledge and given a forum in which to discuss their concerns, citizens provide relevant and valuable information to aid in decision-making.

A few factors limit the effectiveness of a work group. Occasionally, one or two well-organized community interests dominate the group, squelching other important interests or obscuring the community's real concerns. In other instances, members of the group will fail to report back to their constituents, limiting the dispersal of information. To avoid these obstacles, work groups should contain a wide representation of the community and develop ground rules for the meetings that allow all groups to participate equally.

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Work groups are highly labor-intensive and time-consuming. Also, the additional information citizens receive through the work group may occasionally result in EPA extending comment periods to allow them time to understand the technical issues and prepare comments. Most Regions agree, however, that the benefits of having the group outweigh any negative aspects. Their experience demonstrates that work groups are an effective way to give the public a greater role in the decision-making process at a Superfund site.

2) Citizen Superfund Workshop: Few citizens understand the complexity of the Superfund process. This frustrates citizens who want to be involved at the site and contributes to their distrust of the Agency. One Region recently developed a six-hour Citizen Superfund Workshop for all Regions that provides citizens with an overview of the Superfund program. Through lecture, discussion and case studies, the workshop provides participants with a general summary of the cleanup process, as well as an explanation of the various opportunities for public involvement.

The success of the pilot workshop held in Spring 1990 indicates that it could be a very effective way of increasing public involvement at Superfund sites. Not only does it familiarize citizens with the Superfund process, but it also tells them when and how to become involved in the process. In addition, the workshop itself gets citizens involved with EPA, and it gives both parties a chance to meet one another and begin developing rapport.

The workshop is especially effective if given early in the Superfund process. An ideal time is during development of the Community Relations Plan. Regions should convey to participants that the workshop is not a debate on the merits of the Superfund program or a precise indication of how work will be conducted at their site, but a lesson on how the program operates in general.

The workshop is inexpensive and requires only one or two instructors. Guidance materials necessary to conduct the workshop have been developed and distributed to all Regions.

3) Bilingual Communication: Bilingual communication helps break language barriers that prevent non-English speaking citizens affected by a Superfund site from becoming involved or aware of activities at the site. Regions have used bilingual fact sheets for many years, most notably in the Spanish and Portuguese languages. Recently, a few Regions have expanded their bilingual services to include translating other informational materials besides fact sheets, developing bilingual summaries of publicly available technical documents, and

providing translators at public meetings and hearings. These techniques give non-English speaking citizens access to more information about Superfund sites and enable them to participate more broadly and effectively in community relations activities.

4) Citizen Awards for Participation: For a citizen to be highly involved at a Superfund site -- organizing and running a community group for instance -- requires a good deal of time and dedication on the person's part, especially because activities at sites span many years. This can deter some citizens from ever becoming involved at a site and lead to "burn out" among those that do. One Region is encouraging public involvement -- and recognizing the dedication it takes -- by presenting the "Citizen Participation Award." The award is bestowed on an individual, usually representing a citizen group, who has significantly contributed to public involvement at a Superfund site in the Region. The Region states that the award demonstrates to the community the value EPA places on public involvement, and thus encourages further participation.

5) Increased Interviews: Increasing the number of interviews with citizens is one of the most effective methods to enhance citizen participation. Many Regions conduct, where necessary, more than the required 15 - 25 interviews to be used as a basis of the Community Relations Plan. Depending on the site, Regions have conducted anywhere from dozens to hundreds of interviews. Regions should not hesitate to increase the number of interviews to reflect both the complexity and the level of citizen interest at a site. Although this effort may require substantial labor and resources at the outset of community relations work, it helps ensure that the Region identifies and focuses attention on those issues that are most important to the community.

Regions should first determine the scope and history of any problems at the Superfund site, using interviews with local officials and key citizens, and an availability session or public forum. If EPA determines, based on this evaluation, that the site will likely require more aggressive community involvement, the Agency should make plans to significantly expand its interviewing efforts.

Regions have found interviews to be a particularly effective way to gather information. Often issues emerge during the interviews that some citizens would hesitate to air during a public meeting. Increasing the number of interviews enables the Region to develop a highly responsive program for addressing citizens' concerns and involving the community in the decision-making process.

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6) Open Houses/Availability Sessions: Some citizens find public meetings intimidating and may be afraid to voice their concerns at them. Open houses -- or availability sessions -- provide an informal, personal setting in which citizens can discuss their concerns one-on-one with EPA officials. While open houses are not new to public involvement, their use is steadily increasing. Regions are beginning to move beyond only the customary "ice-breaker" open house, toward a more consistent offering of these valuable opportunities throughout the process.

Open houses usually take place at convenient public locations where the Region can set up displays containing information about the site, provide staff to discuss technical information with citizens, or just meet with the community in an informal manner. Regions say that the open houses help the community learn more about the site and about the EPA officials that will be working on it. It helps, one community relations coordinator said, "to show the community that the RPM and other EPA officials are just people." Another said it enabled the Region to "hear from other citizens besides the vocal minority that tends to dominate public meetings." Others use open houses to mark strategic points in the cleanup process.

Open houses are relatively inexpensive, but require planning and participation from a variety of EPA officials who are knowledgeable about the site.

Conclusion: The techniques discussed in this memorandum require additional cost and effort. However, by taking a proactive approach to community relations, and going a step beyond the required activities, the Superfund program will better avoid or resolve conflict with citizens. By encouraging mutually satisfactory two-way communication and promoting increased public involvement in site decision-making, the Superfund program will move closer toward acceptance of citizens as legitimate partners in the cleanup process. The techniques for increasing citizen participation outlined in this memorandum will help achieve this goal.

For further information regarding public involvement in Superfund, please contact Melissa Shapiro or Jeff Langholz of my staff at FTS 398-8340 and FTS 398-8341, respectively.