

EFFECTIVE COMMUNITY RELATIONS: A KEY TO SUCCESSFUL ENVIRONMENTAL RESTORATION

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ABSTRACT

Federal legislation mandates public involvement in environmental restoration projects that must comply with Superfund and National Environmental Policy Act (NEPA) requirements at U.S. Department of Energy sites. An effective community relations program can achieve positive public understanding and support for these environmental restoration projects. Because each community is unique, tailoring the community relations program to fit that town or city promotes public participation, establishes two-way communication, and facilitates the restoration process.

INTRODUCTION

Superfund (Comprehensive Environmental Response, Compensation and Liability Act/Superfund Amendment and Reauthorization Act [CERCLA/SARA]) legislation

mandates public involvement in the environmental restoration process. Public participation is also an integral part of the Secretary of Energy's policy for implementing the U.S. Department of Energy's (DOE's) Environmental Restoration and Waste Management Program.

Community relations programs can and should do more than fulfill the mandated requirements for public involvement. Effective community relations programs can positively impact the environmental restoration effort by creating and maintaining a two-way communications channel with the affected community that improves understanding and support of the technical activities and reduces the probability of unforeseen public objections. Failure to establish sound community relations could result in misunderstanding and formal intervention by the public until differences are resolved.

The benefits of implementing a responsive public involvement program are both tangible and intangible. Some of the potential tangible benefits are the ability to move smoothly through the cleanup process with minimal disruption of schedule or methodology, no increase in project costs due to delays caused by public intervention, and smoother interactions between Federal, state, and local government representatives. Intangible results include reduction of public fears associated with the materials being remediated, development of public confidence and trust in the expertise and efficiency of the cleanup team, and enhancement of the positive reputations of both the regulatory agencies and private companies involved in the project.

MANDATED PUBLIC INVOLVEMENT ACTIVITIES

Superfund

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP), CERCLA/SARA, and other U.S. Environmental Protection Agency (EPA) policies specify certain requirements for a community relations program. "Community Relations in Superfund--A Handbook (In-

terim Guidance)," prepared by the EPA, is an excellent set of guidelines for implementation of community relations activities before and during remedial responses. The guide provides a near-cookbook approach to developing and implementing public involvement at Superfund sites during each phase of a project.

Definitive requirements exist for basic public involvement for Superfund National Priorities List (NPL) projects. The initial requirement is an agency spokesperson who is the designated primary Point of Contact for public information and inquiries. Table I presents the additional basic requirements and associated actions for public involvement.

National Environmental Policy Act

The National Environmental Policy Act (NEPA) requires involvement by the public and other Federal agencies in the NEPA review process. The principal documents used for environmental restoration projects under NEPA are the Environmental Assessment (EA) and the Environmental Impact Statement (EIS). An EA is prepared when it is unclear whether a proposed action requires preparation of an EIS. Requirements for preparation of an EIS are set forth in 40 CFR 1502; procedures for soliciting and responding to comments in the EIS process are in 40 CFR 1503. The regulations of the Council on Environmental Quality (CEQ) are in 40 CFR 1506.6, which discusses procedures for public notification of all NEPA documents. In the past, public involvement activities under NEPA have been confined primarily to the EIS.

On February 5, 1990, the Secretary of Energy issued Secretary of Energy 15-90 (SEN-15) that directs that revisions be made in the DOE's NEPA compliance procedure. SEN-15 substantially augments public involvement. Table II presents current public involvement requirements and corresponding actions for NEPA projects.

With the implementation of SEN-15, the CERCLA and NEPA public involvement processes begin to match more closely. The DOE is currently in the process of developing guidance for public participation during its environmental restoration activities that will complete this integration process. The final guidance will include requirements under CERCLA, NEPA, and the Resource Conservation and

TABLE I
Public Involvement in Superfund National Priorities List Projects

<u>REQUIREMENT</u>	<u>ACTION</u>
Agency Spokesperson	Designate a primary Point of Contact for public information and inquiries.
Community Relations Plan (CRP)	Prepare a Community Relations Plan, based on community interviews, for all remedial actions longer than 45 days duration. The Plan is generally considered a "primary" document under Federal Facilities Agreements and Inter-Agency Agreements and becomes part of the Administrative Record.
Administrative Record and Information Repositories	Provide public access to project decision documents at or near the site and at a central location. Maintain these documents for the life of the project.
Notice of Availability of Remedial Investigation/ Feasibility Study (RI/FS)	Place a public notice of availability of RI/FS and the announcement of a public comment period in a major local newspaper with general circulation.
Public Meeting on the RI/FS and Proposed Plan	Explain the RI/FS and Proposed Plan to the public at a public meeting or a formal public hearing. Receive and consider both oral and written comments prior to issuance of a Record of Decision (ROD).
Preparation of the Responsiveness Summary	Prepare a Responsiveness Summary that responds to each of the significant comments, criticisms, and new data submitted on the proposed RI/FS. The Responsiveness Summary accompanies the ROD.
Public Notice After Selection of Alternative	Make the final remedial action plan or ROD available to the public and publish a notice stating the basis and purpose of the selected action after the selection of the remedy and before the remedial action begins.
Revision of the CRP	Revise the CRP during remedial design, if necessary, based on community concerns discovered during interviews and other activities pertaining to the remedial design and construction phase.
Explanation of Significant Differences	After adoption of the final remedial action plan, publish a notice of any planned significant differences from the remedy in the ROD and the reasons for the differences.
Remedial Design Fact Sheet	Prepare a fact sheet explaining the final engineering design and make it available to the public.
Notice of Intent to Delete	Publish proposed addition and deletion rules in the <i>Federal Register</i> and in a local newspaper of general circulation with a request for comments during a formal comment period.
Responsiveness Summary Prior to De-Listing	Prepare and publish, as part of the final ruling, a Responsiveness Summary that documents comments received on the Notice of Intent to Delete and responses to the comments.
Technical Assistance Grants (TAG)	Advise the community of the availability of the TAG Program and place related information in the Information Repository.

TABLE II
Public Involvement In Nepa Projects

<u>REQUIREMENT</u>	<u>ACTION</u>
Notification of Start of NEPA Process	Notify affected states of DOE's initial decision to prepare either an EA or an EIS.
Environmental Assessment Impact (FONSI)	Provide EA to affected states for a 14- to 30-day pre-approval review. The length of the comment period depends on the nature of the project evaluated and the extent of the analyses conducted.
Finding of No Significant	Once an EA has been approved, a decision is made to prepare an EIS or to issue a FONSI documenting the decision not to prepare an EIS. The DOE notifies the public of the availability of both an EA and a FONSI.
Notice of Intent (NOI) to Prepare an EIS	When DOE actions require preparation of an EIS, an NOI is published in the <i>Federal Register</i> to alert the public. The NOI invites comments and suggestions on the proposed scope of the EIS, including environmental issues and alternatives, and invites public participation in the NEPA process. Notices are also placed in local newspapers of general circulation, and mailing notifications are sent to interested or affected parties, including Federal, state, and local officials; interested citizens; community groups; and Indian tribes.
Notice of Public Scoping Meeting	Publish notice of public scoping meeting in local newspaper of general circulation at least 15 days before meeting.
Public Scoping Meeting	Conduct public scoping meeting to explain the EIS process and the project scope, to answer questions, and to receive public input on the proposed scope.
Public Comment Period	Conduct 30-day public comment period to enable the public to comment and offer written suggestions to the EIS scope.
EIS Implementation Plan(s)	Make all EIS implementation plans public for information purposes.
Notice of Availability (NOA) of Draft EIS	The EPA publishes availability of the draft EIS in the <i>Federal Register</i> .
Public Comment Period	Provide a minimum 45-day comment period for the public to comment on the document. The comment period begins with publication of the NOA.
Notice of Public Hearing	The DOE provides notice of a public hearing on the draft EIS at least 15 days before the hearing date.
Public Hearing on Draft EIS	Conduct a public hearing to receive comments.
Responsiveness Summary	Following the end of the public comment period, prepare a response to all comments received and include the response in the final EIS.
Notice of Availability of EIS	The EPA publishes an NOA in the <i>Federal Register</i> , provides the EIS to the public.
Public Review Period	Provide the allowed minimum 30-day review period prior to issuing the ROD.

TABLE II, Cont'd

Record of Decision

The DOE publishes the ROD in the *Federal Register* and makes it available to the public. A similar notice is generally published in the local newspaper.

Recovery Act of 1976 (RCRA), as amended by the Hazardous and Solid Waste Amendments (HSWA) for corrective actions for Federal facilities.

THE THREE Cs OF EFFECTIVE COMMUNITY RELATIONS

All of the listed public involvement requirements form the base level of activities in a Community Relations Plan (CRP). A multitude of additional communication tools exist that can and should be used to tailor the program to the community.

The key to developing and implementing a positive and effective relationship is how and when these tools are applied. Determining the right communications to use means developing a sound understanding for and appreciation of the uniqueness of each community. Perhaps the most important step in developing that understanding is the community interviews that are done prior to development of the original CRP. However, these interviews are only the first step. The project team must then continue the interactions and remain open to any changes in public attitudes and concerns.

The environmental restoration teams at Chem-Nuclear Geotech, Inc. (Geotech), strive to keep those channels open by applying the three Cs of effective community relations: consideration, candor, and common sense.

Consideration means letting people know ahead of time about key steps in the process and their potential involvement in those steps. Whether the step is a technical milestone or a major project decision point, the public wants to feel involved. The public does not want to feel that the process is rolling on without any consideration of its reactions or of the impacts that might be experienced. It is really a case of common courtesy. People do not like to be ignored or believe that their opinions have no value. Human nature is such that assimilation of change is easier when we know what is coming. This is especially important when working with local and state governments. The goal is to build a partnership of all regulatory agencies with the common objective of a successful remediation process.

Candor means being straightforward when communicating, even when the news is not good or when all the facts are not known. Too often the project team arrives in town following a schedule of basic public involvement requirements, executes a fast and often too technical presentation,

and then departs, leaving the community with the classic feeling of being told "we are the experts, do not question what we are doing, we know what is best."

Common sense is perhaps the hardest quality to incorporate into a community relations program. Most of the intervention surprises seem to come from the public's reaction to what is considered a minor technical problem by the technical staff but is considered a major inconvenience by the community. Transportation and disposal selections are a good example of program phases where conflict can arise. The technical team may feel it is economically and environmentally sound, with minimal safety risks, to truck materials from point A to point B. The community sees only the issues of increased heavy vehicle traffic on its roads, road damage, noise and dust problems, and the specter of a radioactive or hazardous materials spill. Common sense means recognizing the culture and the values of the community and then trying to accommodate those values or at least consider them in the planning and execution steps of a remedial action. As hackneyed as it might sound, one of the ways to achieve success in working with a community is to sincerely try to put yourself in the average resident's place.

Geotech achieved several major environmental restoration milestones during the past years with community acceptance by carefully considering the community's uniqueness, information needs, values, and attitudes; and by applying the consideration, candor, and common sense principles. Those major milestones include the successful negotiation of one of the first Federal Facilities Agreements between the DOE, the EPA, and an affected state; completion of more than 3,400 separate remediations since 1986; issuance of three Records of Decision for NPL and non-NPL projects during 1990, and recognition as part of the National Superfund Project Team of 1990.

CASE STUDIES

The following case studies illustrate application of the principles discussed earlier.

Uranium Mill Tailings Remedial Action Vicinity Property Program, Grand Junction, Colorado

Since 1984, the DOE Grand Junction Projects Office and its prime contractor, Chem-Nuclear Geotech, completed remediation of more than 3,400 private properties as part of the Uranium Mill Tailings Remedial Action (UMTRA) Project. The UMTRA Project is charged with

the responsibility of remediating 24 inactive uranium mill sites nationwide and their adjacent vicinity properties. Vicinity properties are private lands, homes, and businesses where mill tailings were used for construction purposes.

Removing mill tailings from the grounds and basements of private homes and businesses is as intrusive and personal as a remedial action program can get. The potential for distraught, dissatisfied property owners is high. Because of close interaction with the public early in the program, steps were initiated to minimize property-owner stress. This was accomplished by developing a variety of written information vehicles to explain the program and the process with a realistic time line set forth for the property owner. A period of 1 to 2 years can elapse from the original identification of a property needing remediation to the end of construction.

An Owner Relations group was established with the charter of working with property owners on a one-on-one basis. Each home or business owner is assigned a property administrator who acts as an information source, complaint department, and interface with the survey and construction crews. This has been a highly successful system and has given the property owner a real person to work with rather than an impersonal Federal agency.

Additionally, mini-community relations plans were developed and implemented for projects with significant impact on the community or with high visibility. One example of the success that can be achieved by considering the community's culture and information needs on specific projects is the Main Street Shopping Park remediation in downtown Grand Junction.

A four-block area of Grand Junction's downtown shopping area was scheduled for mill tailings removal from beneath the sidewalks. The Shopping Park is considered the "heart" of the downtown area with a variety of specialty stores, art galleries, dinosaur museum, restaurants, theaters, and tree-shaded esplanade. Some 180 businesses were impacted by the remediation.

Approximately 2 years before construction started, regular meetings of a working group began whose members included representatives from the city of Grand Junction, Downtown Development Authority, Merchant's Association, DOE, and Chem-Nuclear Geotech. During the course of these ongoing meetings, the working group discussed and came to agreement on every aspect of the project. DOE and its contractor made every effort to accommodate the business owners' need for pedestrian access during construction and the potential economic impact on customer traffic. It was decided that the least disruptive schedule would be to do the construction during the evening and night hours. Construction subcontracts were put out for bid on a block-by-block basis to run concurrently within a 9-week construction window. Wide, sturdy, handicap-access-

sible bridges with handrails were constructed for each business entrance. Construction staging areas were set up on side streets to minimize public traffic flow disruption. A traffic control plan was developed and approved by the city, and safety fencing and signs were put in place and maintained.

The Mayor and representatives of the Downtown Development Authority and Merchant's Association officiated at the sidewalk-breaking ceremony. An office was set up on Main Street during construction to serve as a central information point. A mailing list of city officials, business owners, media, and other interested parties was established, and weekly status reports were sent to the mailing list. The 11 weeks of status reports provided the public with a running update on work completed, work scheduled for the next week, suggestions to merchants on safety precautions, and a listing of contacts for information or emergency assistance.

During the course of construction, Geotech worked with the merchants and media to keep the buying public aware that the downtown area was open for business. Some of the merchants showed great creativity in their window displays, decoration of the access bridges, and advertising.

As the project neared completion (ahead of schedule), Geotech worked with the Merchant's Association to plan a completion ceremony that was dubbed the "George Jackhammer Ball." A sidewalk sale, street dance, and barbecue culminated the Main Street Project with the Mayor and city officials presenting the DOE Grand Junction Projects Office Manager and the Geotech President with plaques of appreciation. Ongoing relationships with the downtown business community have remained very positive; a Geotech representative was asked to serve on the board of directors of the Downtown Development Authority and the Merchant's Association.

Monticello Millsite Remedial Action Project and Vicinity Properties Program in Monticello, Utah

The environmental restoration being conducted in Monticello is similar to the Grand Junction, Colorado, work--uranium mill tailings cleanup at private properties and permanent remediation of an inactive millsite. However, the Monticello millsite and vicinity properties are on the EPA's National Priorities List that requires involving multiple agencies, including the DOE, the EPA, and the State of Utah. Great care has been taken to ensure that communication with the community is coordinated between all of the players. Monticello is a quiet, rural community of 1,700 nestled at the foot of the Abajo Mountains in southeastern Utah. The small population results in a community where elected officials know, and are known by, most of the area's residents. The current economy has remained de-

pressed since the demise of the domestic uranium mining and milling industry.

Monticello relies heavily on agriculture, ranching, and tourism as its main income source. The people of Monticello are predominantly descendants of Mormon pioneers. Strong family ties, self-sufficiency, and practicality are community values. Additionally, as is frequently found in small Western towns, there is a suspicion of the intentions of outsiders, particularly big government.

Meetings with city and county representatives are frequent and generally held in a relaxed, informal setting--literally over a cup of coffee at the local diner or overlooking the millsite while leaning on a pickup. Government interactions are on a first-name basis. When formal meetings are required to fulfill the public involvement requirements of Superfund, care is taken to keep the government representative count as low as possible, to have the briefers avoid the three-piece-suit look, to keep the meeting proceedings as conversational as possible, and to really listen to what the community is saying.

A seasonal construction office is maintained in Monticello with plans for year-round staffing once work on the millsite begins in the fall of 1991. Local businesses are used whenever possible, and potential local construction subcontractors are provided with as much information and assistance as possible to allow them to qualify to bid on project work.

Emphasis is placed on providing Monticello residents with as much information as possible in plain language and in a timely manner. Prior to the start of a significant phase or when major milestones are achieved in the vicinity properties or millsite remediations, either a fact sheet is sent to the master mailing list or a public information meeting is held.

The master mailing list includes almost every family in the town, as well as town, county, State, and Federal contacts. Once millsite remediation starts, if community interest warrants, an 800 telephone number will be installed to provide direct access to the DOE Grand Junction Projects Office Public Affairs Officer at no cost to the caller. Currently, the Geotech Public Relations Director visits the community on a regular basis to meet with key contacts and opinion makers. The number of visits will probably increase as construction activities escalate. Telephone contact is maintained throughout the year.

Prior to each season's construction start, local sensitivities or problems are taken into consideration. For example, the Monticello area has a semiarid climate. For the past several years, the Western states have experienced near-drought conditions. In 1990, restrictions on water use for lawns were probable and were subsequently put into effect. Considering public reactions to seeing their lawns slowing

drying up while water was being used as dust control for the tailings removal, arrangements were made with private water sources to supply what would be needed rather than using municipal water sources. Those arrangements were then communicated to the public.

EPA Denver Radium Superfund Site, Denver, Colorado

The Denver Radium Superfund Site consists of some 44 properties widely scattered throughout Denver, Colorado, that were contaminated by radioactive residues resulting from the processing of radium in the early 1900s. The 44 properties have been grouped into 11 Operable Units based on location or similar site characteristics. The EPA's Region VIII office is the lead agency with responsibility for site cleanup. On the basis of the extensive remedial action experience of the DOE Grand Junction Projects Office and Chem-Nuclear Geotech, EPA requested assistance with planning and remedial action management for this project.

The public involvement process for Denver Radium follows the classic EPA requirements and then expands the community relations effort to fit a major metropolitan area with a diverse culture and economy. Communications strategies are developed and implemented for each significant cleanup phase or by Operable Unit. In some instances, information materials are produced in both English and Spanish to accommodate a large Hispanic population. Close liaison is maintained with a variety of neighborhood associations. Information updates, fact sheets, and briefing meetings are tailored to meet the information needs and concerns of the neighborhoods around each Operable Unit. Transportation and disposal was identified as a key city-wide community concern because of the heavy vehicle and railroad traffic throughout the Denver area. A specific communications strategy was developed for this phase, including maintaining communications with key officials in Colorado, Wyoming, and Utah--the rail route for transporting materials to a final repository in Utah. The Denver Radium Superfund Site Project team was named the National Superfund Project Team of the Year for 1990, based on the progress of the cleanup to date and the public acceptance of the project.

CONCLUSION

Geotech's practical and successful experience leads us to recommend consideration of the following common sense aspects of community relations:

Community Presence--If the project is going to have an impact on the community for a period longer than a couple of months, base at least one person in that community who can be a Point of contact and information source.

Community Support--Encourage those who will be working in the community to get involved in the community through civic, church, charitable, fraternal, or educational

groups. Private contractors should provide some visual sign of community support, whether it is participation in the local United Way/Community Chest campaign or support to local environmental or educational projects.

Keep Listening--Subscribe to the local newspaper and read it regularly. Newspapers and newscasts can provide a wealth of information on what concerns a community and who its leaders are, as well as provide valuable feedback on how your efforts are being perceived.

Keep Talking--Maintain a flow of information that is reader friendly. Project status reports can be short and easily produced and will serve to keep the community in touch with what is happening.

Environmental restoration projects can be successfully conducted in diverse communities, ranging from the rural small town to the megapolis. Public understanding and support of the project can be achieved. Winning and maintaining that support takes time and effort. However, success can be realized by following the public involvement guidance provided by the regulatory agencies and enabling legislation and by applying the consideration, candor, and common sense principles of effective community relations.

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