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MANAGEMENT

Good Practice Guide
GPG-FM-022

Public Participation

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Office of Field Management
Office of Project and Fixed Asset Management

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1. INTRODUCTION

The goal of a public participation plan is to align project interests with public interests so that project decisions reflect community concerns. To ensure the proper level of public participation, planning should begin early, during the project's conceptual phase, so that public participation can be integrated with the decision-making process throughout the project. To ensure consistency and the most efficient use of public participation resources, the project manager must coordinate all public participation activities through the Headquarters Office of Public Affairs or its counterpart in the field. The Public Affairs staff is experienced in communicating effectively with the public and can help the project manager use existing mechanisms for public participation to gain public input. Such coordination may include consulting with other project managers involved in ongoing public participation activities (e.g., public participation coordinators for Environmental Management projects). This Guide explains how public participation works within the project, but the project manager should rely on Public Affairs to direct the effort.

For example, this Guide includes an overview of the elements that should be part of a successful Public Participation Program, but it assumes the project manager will work closely with the public affairs staff. This Guide also explains how and why public involvement is important to the success of a project and describes different public participation tools the project manager, working with Public Affairs, may use.

In implementing this Guide, it is important that the project manager fully understand and enact the intent and requirements of DOE P 1210.1, PUBLIC PARTICIPATION, which sets forth the Department's goals and core values for enlisting public input on project decisions. In her forwarding memorandum of July 29, 1994, Secretary O'Leary emphasized the Department's intent to conduct its business "open to the full view and input of those whom it serves, consistent with applicable laws, regulations, and contracts." The policy statement gives each site the responsibility to develop and implement its own public participation program "tailored to meet specific program, site, and stakeholder needs."

Accordingly, public participation plans may be geared to a site or to a specific project. The site-integrated plan covers all project activities at a site. Although small and/or medium-sized projects may be incorporated into the site-integrated plan, a large project (as defined by cost or project duration) may require its own plan. This Guide lists and explains the minimum components recommended for an effective project-specific public participation plan, but the principles might be applied to a site-integrated plan as well. (See the Bonneville Power Administration Public Involvement Guide for a detailed

discussion of public participation, including an approach to analyzing public participation needs and a catalogue of techniques.)

It is important to note that various public participation requirements are imposed by the following laws, which should be reviewed by the project manager to determine applicability.

- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as revised by the Superfund Amendments and Reauthorization Act (SARA).
- Resource Conservation and Recovery Act (RCRA).
- National Environmental Policy Act (NEPA).

2. PRINCIPLES AND PROCESSES

2.1 Two-way Communication

In the past, many public participation programs relied on one-way communication. Officials used presentations, brochures, press releases, and other public information tools to tell the government's side of the story without inviting public comment.

Those days are over. Besides being required in many cases by law, citizens often demand a say in how—and sometimes if—a project will be carried out in their community. When they don't have the opportunity to participate, they are much more likely to resist and oppose a project, which can present a serious obstacle to success. When people can participate in and affect the decision-making process, however, they are more likely to accept the outcome of that project. In addition, they may be able to share information that increases the likelihood of project success.

2.2 The Public's Role in Decision Making

2.2.1 The Public's Level of Interest

Interest in community issues varies widely. Some individuals or groups are intensely interested and will devote considerable time and energy to learning about issues and participating in decisions. Others participate occasionally. Others do not participate at all.

Effective public participation is graded so that individuals can participate at their level of interest. Accordingly, public participation plans should provide a variety of opportunities for participation. For the most active members of the public, such activities can include participation in citizens' boards, public meetings and hearings, and one-on-one meetings with project representatives (envoys) or public affairs officers. Less active individuals can be reached through news releases, news conferences as appropriate, community newsletters, and direct mailings. Such opportunities are all part of the Public Participation Tool Box discussed in section 2.5.

When overall public interest in project decisions is extremely high or the project is controversial, project managers should be especially mindful of keeping the public informed about the project and opportunities for participation throughout the decision-making process.

2.2.2 Anticipating Controversy

Effective public participation is especially important when a project generates high levels of public interest or is likely to be controversial. Existing public participation programs provide excellent insight into issues that generate public concern. Note the following examples identified in the Fernald Environmental Management Project Community Relations Plan (January 1995).

- Groundwater and surface water contamination.
- Public and worker safety and health.
- Future use of the facility.
- Cleanup progress.
- Budget and costs.
- Public involvement, public information, and communication.

In addition to these issues, storage and transportation of radioactive and other hazardous materials have proved to be controversial.

If the project raises one of the above issues, it may be controversial and should be handled accordingly. Any project with implications concerning safety and health, the use of tax dollars, reduction in the number of jobs, reduction in the value of real estate—any marked change in the status quo—is likely to generate public concern, making an effective public participation program necessary. In addition, the following elements should be considered in gaging the amount of controversy associated with a project.

- Do advocacy groups already exist for particular outcomes, either within a site or among stakeholders? Such advocates, either internal or external, are likely to generate controversy in an effort to ensure their preferred outcome prevails. It is best in such instances to provide a forum so that these individuals—and others with different opinions—can debate their ideas in an effort to resolve the issues.
- Is the decision primarily a technical choice, or does it require one public concern to be weighed against another? Decisions that are primarily technical usually require minimal public involvement. Decisions that require choices between public concerns are more likely to generate interest and controversy.

- Is the technical basis for the decision subject to significant disagreement or uncertainty? If so, even technical decisions are likely to be controversial. Uncertainty about the technical basis of a decision, particularly when it involves some level of risk to public or worker health and safety, becomes the basis for people to argue against decisions they do not like.

Managers should make informed judgments about which level of activity is appropriate by consulting with Public Affairs, other managers who have conducted similar public participation programs, and major stakeholders who can provide insight into the level of public interest.

2.3 Public Affairs Staff

Although a dynamic public participation program adds to the duties of project managers, most of this effort should be assumed by the Public Affairs staff. During the conceptual phase, the project manager should request that a Public Affairs staff member be assigned to the project. This individual, whose job is to translate technical ideas into public information, works with the project manager to develop communications and public participation plans. (See Attachment 1, Sample Communication Plan). This individual should also develop and maintain project-specific summaries of community concerns, based on the ongoing public participation process. (See section 2.4.1.)

Public Affairs counselors also help ensure the timely dissemination of factual information to Federal, State, and local officials, key stakeholders, educators, the media, and special interest groups, as well as the public.

General Public Affairs services include the following.

- Management of media relations.
- Development of written materials that provide technical, engineering, or environmental information to the public.
- Graphic design, video production, and photography services.
- Review of technical documents for community concerns.
- Public opinion research.
- Employee communication.

- Community outreach services.
- Training in public speaking and risk communication.

2.4 Public Participation Plan

Good timing is critical to the successful integration of public participation with the project's decision-making process. If the public does not have the opportunity to provide input soon enough in the project, their information may be received too late to be used effectively, leading them to believe that their interests have been ignored. On the other hand, if they are asked for input too soon, before the project and related decisions are adequately defined, the public may feel their input is meaningless. Either way, DOE may lose credibility.

For these reasons, it is important to establish the public participation plan early in the project. Depending on the size and length of the project, it may be advisable to have stakeholders review the public participation plan before it is finalized; stakeholders may provide useful insight about the best ways to gather public input. The plan should be updated continuously to reflect changes in the project and the decision process—and public input. (See Attachment 2 for a sample of public participation activities)

The plan should define project goals for public participation. Goals may include compliance with laws and regulations; the National Environmental Policy Act, for example, requires that procedures be developed to ensure the "fullest practicable provision of timely public information and understanding of Federal plans and programs with environmental impact in order to obtain the views of interested parties." Additional goals include responding to specific community issues, such as land use and health concerns; in so doing, the project manager may seek to reduce or eliminate costly delays caused by public objections. To meet such goals, the public participation plan should indicate the level of public involvement needed, the specific interest groups that should be consulted, and the time frame required.

The decision-making process for a particular project or project activity may be simple or complex (see *Engineering Tradeoff Studies*, GPG-FM-003), but the basic steps of public involvement consist of the following, which should be used to develop a public participation plan.

- Conduct a community assessment.
- Consult the public.

- Identify potential alternatives that deal with public concerns.
- Inform stakeholders of the alternatives being considered.
- Evaluate and refine the alternatives.
- Present the alternatives to the public.
- Make the decision.
- Evaluate progress continuously and revise the plan accordingly.

2.4.1 Conduct a Community Assessment

Community assessments, which are prepared by Public Affairs, identify the public issues most likely to affect the success of the project and the stakeholder groups most likely to participate in—or object to—the decision-making process.

The community assessment, described below, is an invaluable resource during the project. In addition to discussing the structure of the community, the profile may describe how the community has reacted to the site in the past, what citizen actions have been taken, how DOE's approach to public participation has changed over the years, and how the community regards the risks posed by the site, focusing on the perceptions of past events and problems. (See Attachment 3, Site Overview, Community Profile and Concerns)

2.4.1.1 Identify Stakeholders.

The term *stakeholder* refers to people who are interested in a project decision because of their proximity, economic interest, use, mandate, or authority, or their vulnerability to environmental, socioeconomic, or cultural impacts.

Stakeholders may be part of one or more of the following groups.

- U.S. EPA,
- U.S. DOT,
- other Federal agencies,
- Native American Tribal Governments,
- State governments,
- local governments,
- elected officials,
- environmental group,
- industry and professional organizations,
- labor organizations,
- education groups,
- citizens groups, or
- community members.

Public participation plans should identify which stakeholders are most likely to take an interest in project decisions and commit their time and resources to participate in these decisions. The plan should link specific stakeholder group(s) with specific technical issues, objectives, and/or other significant features of the project. This information can be used to plan for the participation of that group during project implementation, including the timing of their participation, and the size, type, and cost of related activities.

2.4.1.2 Identify Issues Likely to Affect the Public

To obtain the participation of all major stakeholders, it is important to identify issues at a level that does not automatically rule out all the options they believe should be considered. For that reason, the first step in the public participation plan may be the initiation of an envoy program or citizens advisory group (CAG) to obtain an initial list of the public's concerns. Public Affairs will be instrumental in the success of this effort and can provide valuable information, including public opinion research and community profiles.

If the project manager chose not to consult with opinion leaders, the team would have to develop alternatives by starting with known technical approaches and combining them in various ways. The project team might be able to decide on one alternative, but, by working in isolation from the public, would be likely to prejudge major value issues in favor of technical solutions, perhaps failing to account for public concerns.

When the team works with various stakeholders, however, they are more likely to consider a broader range of alternatives. In fact, the range of choices may be too broad to

allow detailed technical evaluation of each alternative, but stakeholders are far more likely to support the process if they can see that the alternatives considered reflect their concerns.

Typical public issues may include long-term safety, short-term risks, on-site disposal requirements, the impact on natural resources, transportation and off-site disposal requirements, economic impacts and benefits, and cost.

The Fernald Community Relations Plan (January 1995) lists the following community issues.

- Providing truthful information about the site and site activities.
- Involving stakeholders in the decision-making process.
- Site impacts to public health, safety, and the environment.
- Desire to conduct activities of public concern without wasting taxpayers' money.

Such a list makes a useful starting point for determining how to approach the public and encourage their participation in the decision-making process.

2.4.2 Consult the Public

The public participation plan should recognize that once the issues are identified and various alternatives are under consideration, the project manager, in concert with Public Affairs, should publicly announce the various options and seek comments. Depending on the level of public interest, the best avenue for this discussion may be a citizens task force, a public meeting or hearing, or an announcement in the newsletter with an invitation for comment. At this time, the public may suggest additional alternatives or ways to modify existing alternatives to make them more acceptable. The public may also provide reasons for rejecting certain alternatives. This step may more fully define existing alternatives or extend the list further.

2.4.3 Identify Potential Alternatives that Deal with Public Concerns

To maintain credibility and ensure selection of the best alternative among a range of options, the evaluation process should be as objective as possible, taking into consideration the technical and economic feasibility of alternatives while describing the

social, economic, and environmental impacts that would result from each. These impacts should be described so that they are technically verifiable.

Because the number of alternatives may be too great to allow detailed evaluation of each one, this evaluation may necessarily be a "rough-cut." Based on this rough-cut evaluation, the project team may determine that some alternatives are not feasible technically, have too many unacceptable impacts, or are unacceptable to the public. Accordingly, unacceptable alternatives are eliminated and the possibilities reduced to a number that can be reasonably studied at a higher level of detail.

It is not always easy for the public, or even decision makers, to determine which alternatives are best. The best alternative for one group may not be the best for another. Cost may be the project manager's primary consideration, for example, while jobs may be the primary public concern. When the project manager is faced with such choices, public participation is especially important in determining the range of acceptable choices, even though one choice will not please everyone.

2.4.4 Inform Stakeholders of the Alternatives Being Considered

Again, project managers should use the various public information tools to tell stakeholders and the public what alternatives are being considered, the criteria used to discard some, and which seem most promising. The public can offer additional input to help the project team further evaluate and refine the alternatives.

2.4.5 Evaluate and Refine the Alternatives

Most effective decision-making processes go through several iterations. Each time, some alternatives are eliminated, and some added. With each iteration, the alternatives are defined to a greater level of detail in an effort to select the alternative that best suits the technical and cost needs of the project, while recognizing the public's values.

In making these determinations, the project team and Public Affairs should answer the following questions.

- What evaluation methodology should be used?
- Are alternatives consistent with stakeholder concerns?
- Can the alternatives be modified or combined to better accommodate the various factors affecting decision?

- Is more information needed to make the decision?
- If a public concern changed for some reason, would the choice of the alternatives be affected?
- Is more than one course of action acceptable if the situation changes or if new information makes the first choice unacceptable?

2.4.6 Present Alternatives to the Public

Once again, the public participation plan should provide for a public forum to discuss the alternatives. If uncertainties about the alternatives still exist, they should be honestly presented with some estimate of the time required for resolution. At this point, the schedule should allow for further changes.

2.4.7 Make the Decision

In the end, the project manager is responsible for the decision. Obviously, public participation cannot dictate the decision; even the best public participation programs involve only a small percentage of the public. However, when stakeholders care enough to participate in the decision-making process, their participation should mean something, or they will be more upset than if they had not been asked to participate in the first place. For that reason, it is important that the project manager and the project team work to ensure that the public understands how their concerns were considered. Once again, some public forum must be provided to announce the final decision, along with a clear explanation of the process used to make the decision, the criteria used, and the impact of the decision on stakeholder interests.

2.4.8 Evaluate Progress Continuously and Review the Plan Accordingly

Throughout the project, the project team should evaluate decisions as described above, in addition to reevaluating decisions already made, so that they recognize and take advantage of any opportunity to accommodate the public.

The evaluation process can be difficult. For one thing, many of the benefits of a public participation program are intangible and therefore subjective and difficult to measure. For another, the benefits of one public participation activity depend to some extent on the success of other, related public participation activities; the credibility established by one group or during one activity may affect another.

Ultimately, the project manager's ability to evaluate the public participation effort is dependent on how clearly the public participation plan addressed the following elements, which are defined and described in the *Bonneville Power Administration (BPA) Public Involvement Guide*.

- **The major players.** The plan should clearly address who will participate in the public participation program, what each group defines as its objective, and how each group defines success.
- **Measures of success.** As defined in the BPA Guide, "measures are the criteria which will be used to measure how well ... objectives were met." If the project manager's goal is to have as many people involved as possible, a measure might be the percentage of the population participating in some manner. If the objective is something intangible, like trust, the measure might be the number of people who report increased trust by way of surveys or interviews.
- **Standards.** Standards quantify the activity so that it can be judged "good" or "adequate." For example, how many people must respond to a survey for it to succeed? How many people must visit the information center for it to succeed.
- **Evaluation.** By measuring the objective before the public participation program begins and again afterward and comparing the two, the project manager can make some determination as to the success of the program.

2.5 Public Participation Tool Box

2.5.1 Public Meetings and Formal Public Hearings

Public meetings provide a two-way exchange between the public and DOE. Public meetings may include a panel of DOE or independent speakers, informal discussions with speakers, exhibits, and a question and answer period. Public meetings can also include smaller sessions with technical personnel. Providing telephone links to the meeting for those unable to travel to the meeting location, and on occasion, holding evening or Saturday sessions to attract people who find it difficult to attend meetings during the work week are other ways to encourage participation in public meetings.

As opposed to public meetings, public hearings, which follow a more prescribed format, are usually held to fulfill the requirements of laws, regulations, or legal agreements and may be convened by DOE or by a regulating agency (the EPA, for example). Hearings

provide a formal record of public comments on a specific regulatory document for permit application.

Public meetings and public hearings are very visible and for that reason potentially problematic. Depending on the issue and the public's level of interest, the meeting may be well-attended by both the public and the media. If the project is controversial, the meeting may be volatile. For these reasons, Public Affairs should plan and direct the meeting. They can help anticipate problems and plan solutions, including innovative approaches that will enhance the exchange of information.

At the Mound plant, for example, DOE and stakeholders took a fresh look at the DOE budgeting process by playing "Priority," an interactive board game created by DOE employees. This approach informed stakeholders about budget reductions and how they affect programs, helped them to better understand environmental management activities and associated costs, and gathered their input concerning cleanup priorities, given available funding. The approach generated lively discussion on a topic generally considered boring.

At Oak Ridge, the Innovator™, which features modern polling software and audience response keypads, provides immediate and anonymous feedback to DOE. It has been used to assemble an information base of citizen reactions to alternatives.

In addition to project-specific activities, project managers should take advantage of established sitewide public forum activities, such as risk workshops or record of decision meetings, and incorporate them into their public participation plans. Regular attendance and briefings at local township trustee and civic meetings are another means by which the project team can keep community groups informed of events at the site.

2.5.2 Citizens Groups

Citizen groups can include a variety of possibilities, such as roundtable discussion groups, work or technical review committees, or citizen advisory groups (CAGs). Such groups can be established for a specific project, or the project manager can work with groups already established at the site. Note that such groups are regulated by the Federal Advisory Committee Act (FACA, Public Law 92-468). The project manager should study this law and ensure compliance with it.

The single most important component of success for the citizens groups is a sincere commitment by DOE and its contractors to seriously consider its recommendations. Citizens groups can provide independent recommendations on key project decisions, but

all levels of management must be willing to work directly with the citizens task force and its members. Managers who do not understand the significance of public participation should receive additional training to prepare them for the public process. Credibility and trust is most often lost at the working level by managers or engineers who send messages that public input is not important or wanted.

Creating an effective citizens task force is difficult in the same way that any other public participation activity is difficult, not because such boards are difficult to establish, but because DOE must provide information to stakeholders that may invite challenges, troublesome questions, and disagreements. However, citizens groups can bridge this gap by establishing a personal relationship among stakeholders, especially between project representatives and local citizens, which is essential to developing the confidence and trust needed to make cooperative decisions.

A citizens task force provides real public participation, which may increase public understanding and acceptance of the issues while providing DOE decision makers with insight. Such a group can help the project manager focus on issues that may be lost in the project decision-making process and that require significant local involvement. The citizens task force also provides ready access to a knowledgeable group of stakeholders who can act as a sounding board for important and sensitive issues. Finally, the citizens task force can informally disseminate information to the public.

It is important that members understand that they represent the demographics and socioeconomic conditions surrounding the facility. Members should be encouraged to recognize and understand the groups most likely to identify with them and work to ensure those groups are informed of and involved in board activities.

Although it can represent a full range of public concerns, the citizens task force cannot possibly represent everyone. It is important to point out that the citizens task force is not the only stakeholder group that DOE listens to. The citizens task force does not replace any piece of a public participation program, but enhances the effectiveness of direct public involvement in decision making.

2.5.3 Envoy Programs

In most American communities, even big cities, a relatively small group of opinion leaders reflects the values of community groups. If the concerns expressed by these opinion leaders are addressed before a decision is made, the decision is less likely to be overturned.

Using this principle, Public Affairs can establish an envoy program to promote one-on-one communication between site personnel and opinion leaders who represent local community groups. Envoys may access a wide range of stakeholder groups, such as adjacent property owners, business leaders, schools, environmental groups and agencies, and public officials. Envoys should be carefully selected based on their interests, positive attitude, leadership qualities, and willingness to spend personal time to improve the site.

Because the community logically turns to site employees for information about site activities and related issues, it is extremely important that envoys be selected and trained carefully to convey project information appropriately. Ill-prepared envoys can do more harm than good to an otherwise successful public participation program. For that reason, envoys need—in addition to training—complete, current, and accurate information, gathered by Public Affairs from technical experts. Envoys can then relay this information to the public. In exchange, envoys listen to the ideas, suggestions, concerns, questions, and values of the stakeholders, providing this input back to the project manager before decisions are made. With a successful envoy program, public meetings may become less important, serving primarily as group affirmation of understandings reached through person-to-person contacts.

2.5.4 Newsrooms and Information Data Bases

Newsrooms are an innovation adapted from the operation of daily newspapers. Such centers, which provide accurate, up-to-date information about site activities and issues, are especially useful in supporting envoys. The Public Affairs staff gathers information concerning technical issues, such as strategic planning, regulatory compliance, risk assessment, and construction. This information is then provided to envoys to use as needed.

Information provided the newsroom should cover all aspects of the project, including the project team's status in the ongoing decision-making process. Managers or employees report information they receive at meetings or through other means by calling or e-mailing Public Affairs, much the same way that the public calls news organizations with news tips. Public Affairs then compiles the information into an easily accessible, centralized database. This data base functions much like a wire service and is available electronically to managers, employees, and envoys as talking points for person-to-person contacts. The "wire service" should be used in preparing all public information materials to help ensure the consistency and accuracy of facts.

2.5.5 Prompt, Factual, Accurate Responses to Inquiries

Whenever members of the public or news media have questions or express concerns regarding site developments, events, cleanup plans, and progress, they have presented DOE with an excellent opportunity to increase the public's understanding and gain favor for the project. The project manager should plan in advance for such inquiries, working with Public Affairs and preparing technical staff to respond quickly, preferably within 48 hours.

2.5.6 Print Materials

Print materials include newsletters, fact sheets, employee publications, and progress reports, which provide updates on key activities and events at the site and promote public involvement. While by nature a form of one-way communication, even print materials can be modified to be more interactive. One technique is to introduce a comments/question and answer column into the newsletter, which allows the public to get information about the site without waiting for a public meeting. Such a format has the added benefit of anonymity, which may encourage individuals to speak out or ask questions when they might otherwise remain silent.

2.5.7 Additional Public Information Tools

A number of other tools are available to the project manager, including the following.

- Exhibits at public events and in public buildings.
- Visitors bureau and tours of the facility.
- Public information centers, which provide access to a full range of print materials, including technical reports.
- A speakers bureau to provide speaker services to the community.
- Mailings to interested individuals notifying them of public comment periods or the availability of documents.
- Audiovisual materials, including videotape to provide visual information about the site activities.
- Public reading rooms.
- Educational activities, like the EnvironMENTAL (sic) Fair at Oak Ridge and the Carlsbad-Loving Educational Coordination Council at Carlsbad.

3. MEASURING FOR RESULTS

During the course of the decision-making process, the project manager may want to quantify comments as a means of evaluating alternatives. The Bonneville Power Administration's Public Involvement Guide provides useful guidance in two analytical techniques: content summary analysis and *Codinvolve*, a process developed by the U.S. Forest Service to evaluate a large number of public comments. Such analysis may provide useful information in determining prevailing public concerns, but it should not take the place of sustained public outreach.

Depending on the size of the project and the level of public interest, project managers may want to conduct ongoing evaluations of their public participation programs. Data can be gathered using methods similar to those employed by the program itself (e.g., interviews, telephone and mail surveys, public meeting input). Criteria for determining the success of the program include overall satisfaction with opportunities presented for two-way dialogue and the perceived degree of responsiveness to community concerns and values.

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4. SUGGESTED READING

- U.S. Department of Energy Fernald Field Office: Public Involvement Program for the Fernald Environmental Management Project (November 1993).
- The Focused SSAB: Key Issues and Activities from the Fernald Experience (October 1994).
- Fernald Environmental Management Project Community Relations Plan (January 1995).
- Committed to Results: DOE's Environmental Management Program: An Introduction (pp. 7-8) (April 1994).
- U.S. Department of Energy Environmental Management: How Can I Get Involved? (November 1994).
- U.S. Department of Energy Environmental Management: What Have We Accomplished Together? Public Participation Highlights (November 1994).
- U.S. Department of Energy Environmental Management: Is DOE Serious? Our Commitment to Public Participation (November 1994).
- Fernald Environmental Management Project: Fernald Envoy Program (December 1994).
- Fernald Citizens Task Force: Recommendations on Remediation Levels, Waste Disposition, Priorities, and Future Use.
- How to Use Public Values in TWRS Decision Making.
- Department of Energy Office of Tank Waste Remediation System: Interim Policy Guidance for TWRS/Systems Engineering Public Involvement.
- Bonneville Power Administration Public Involvement Guide.
- DOE Public Participation Policy.
- DOE O 151.1, COMPREHENSIVE EMERGENCY MANAGEMENT SYSTEM (9-25-95).

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5. DEFINITIONS

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6. ASSISTANCE

Questions concerning this Guide may be referred to the Office of Field Management in Washington, D.C. at (202) 586-4041.

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ATTACHMENT 1

Sample Communication Plan

The Preferred Alternative for the South Plume Engineering Evaluation/Cost Analysis

COMMUNICATION PLAN*

OBJECTIVE:

The objective of this plan is to provide a framework for communicating with key stakeholders and interested parties about the preferred alternative identified for the South Plume Engineering Evaluation/Cost Analysis document. The preferred alternative is to pump the contaminated plume of groundwater from the aquifer and to dump it into the Great Miami River. This alternative is likely to be opposed by area residents.

AUDIENCE:

- Local residents of the Fernald site
- State and national environmental groups
- Local township trustees and county commissioners
- Fernald Residents for Environment, Safety and Health, the local watchdog group
- Concerned state agencies
- U.S. and Ohio Environmental Protection agencies
- Regional news media
- Fernald employees

STRATEGY:

The overall strategy is to conduct a workshop on the document, with presentations emphasizing that the preferred alternative is simply a recommendation; not a final decision. The workshop will be held from 7 to 9 p.m. on May 30, 1990 at Crosby Elementary School, 1234 New Haven Road,

Harrison, Ohio. There will be three DOE panelists: One to speak on the South Plume document, one to address risk concerns, and one to talk about public participation.

A flip chart will be used at the meeting to list general concerns expressed by participants, but a court reporter also will attend to capture comments. The handouts include:

- The Engineering Evaluation and Cost Analysis document
- A progress report on the South Plume, the nature and extent of the problem
- The Fernald site overview fact sheet
- A schedule of the activities required for the Remedial Investigation and Feasibility Study under the Amended Consent Agreement

MESSAGE:

- No decision has been made on the South Plume removal action alternative; the public still has ample opportunity to voice its concerns
- Discussions of the removal action process and how the preferred alternative for the South Plume was identified

TACTICS:

- Publicity will include a news release, distribution of flyers in the surrounding communities, advertisements in the three local newspapers, and an invitation letter to key stakeholders.
- DOE will conduct individual courtesy calls/briefings with members of the news media and key community leaders.
- Township liaisons and other Fernald envoys will announce the workshop with their groups.
- Public Service Announcements will be sent to the electronic news media.

-The employee publications will promote the workshop.

BACKGROUND:

-This Engineering Evaluation/Cost Analysis is the first to be generated for the Fernald site; public interest is high.

-The South Plume groundwater contamination has been of concern since it was identified in 1989, and the plume is traveling toward a public water supply well field at a rate of 200 feet each year. Without any action, the plume will reach that well field in 5 years.

-Several residents who have had elevated levels of uranium in their wells now receive bottled water, paid for by DOE.

-The Engineering Evaluation/Cost Analysis document has been delivered to U.S. and Ohio EPA.

SENSITIVITIES:

-People who have been drinking from their wells are concerned about the potential health risks associated with the uranium contamination in the South Plume; they want DOE to pay to extend the public water supply and pay for their hookups.

-Area residents have historically opposed any dumping into the Great Miami River, which has some recreational value for fishing and boating. They are concerned about the impacts to the river from increased dumping.

**This plan addresses a hypothetical situation; it is included only to illustrate the elements of a communication plan.*

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Attachment 2

**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT
Required and Supplemental Public Involvement Activities¹**

Required Public Involvement Activities

- Provide DOE Spokesperson and Community Point of Contact
- Establish and Maintain Information Repository
- Brief Local Officials
- Conduct "Kickoff" Meeting(s)
- Notify Public of Availability of Feasibility Study and Proposed Plan
- Public Notice
- Conduct Public Comment Period
- Provide Public Meeting with Transcript
- Notify Public of Availability of ROD and Responsiveness Summary
- Prepare Explanation of Significant Differences (if any)
- Revise CRP, if necessary
- Notify Public of Remedial Design
- Prepare Fact Sheet on Final Remedial Design
- Notify Public Prior to Beginning of Remedial Action

Supplemental Public Involvement Activities

- Conduct Briefings
- Contact Community Members
- Conduct Public Meetings and Availability Session
- Develop Mailing List
- Designate Agency Contact
- Solicit Citizen Input for Evaluating FS Alternatives
- Respond to Media Inquiries
- Maintain Public Dialogue
- Develop and Distribute Fact Sheet
- Issue News Releases

¹ Derived from Figure 5-1 of Fernald Community Relations Plan.

- Offer Public Meeting
- Issue News Releases
- Offer Public Meeting, Availability Session, and Workshop
- Offer Public Meeting on Remedial Design Work Plan and Approach
- At Preliminary and Pre-Final Design Phase Offer Public Meeting; Prepare Public Information Tools (e.g., Fact Sheet(s), Newsletter Article(s), News Release, etc.); Notify Public of Documents of Significance
- Maintain Public Involvement and Dialogue
- Conduct Site Tours
- Provide Briefings at Township and Community Meetings
- Provide Briefings at Township and Community Meetings
- Issue Fact Sheets and Newsletters to Provide Periodic Updates Describing Cleanup Activities
- Conduct Press Briefing and Issue News Releases
- Review/Revise CRP

ATTACHMENT 3

Site Overview Community Profile and Concerns

Site Overview

The Fernald site is bounded by Ohio Route 126 to the north, a transmission line to the east, Willey Road to the south, and Paddy's Run Road and the Chesapeake and Ohio railroad to the west. It occupies 1,050 acres, of which about 850 lie in northern Hamilton County and about 200 in adjacent Butler County. The site is about 17 miles northwest of Cincinnati.

Although Hamilton and Butler counties are generally urbanized, the area immediately surrounding the Fernald site is primarily rural and dominated by agriculture, with some light industry. Commercial and public land uses include sand and gravel operations, industrial facilities, some retail businesses, nurseries, schools and parks.

The federally-owned Fernald site is considered part of Hamilton and Butler counties; it does not constitute a federal reservation.

Construction of Fernald began in 1951 and production started in 1952. The facility produced high-quality uranium products, which were used to make nuclear weapons. In July 1989, DOE suspended production. In February 1991, the agency proposed shutting the facility for good and focusing on cleanup. That plan was approved in August 1991.

Since 1952, various radionuclides and other contaminants have been discharged to the air, soil, and water. The principle contaminant of concern is uranium, although some thorium and radon also have been released into the environment. Non-

radioactive hazardous substances, such as hydrofluoric acid, nitric acid, and sulfuric acid, have been handled at Fernald. Known and potential releases of radionuclides were significant enough for the site to be placed on the National Priorities List in 1989.

Community Profile

The combined population of Hamilton and Butler counties is about 1.2 million people. Hamilton County has a population of about 870,000, and Butler County has a population of about 292,000, according to 1990 census figures. Most of the communities surrounding the site are unincorporated towns varying from an estimated population of 39 in the Village of Fernald to about 3,000 in Ross.

The township is the unit of local government in the area in which the Fernald site is located. There are three township governments within the immediate vicinity of the site: Crosby Township in Hamilton County, and Ross and Morgan townships in Butler County. Representatives of these township governments participate in emergency preparedness exercises and receive regular reports about cleanup. Township officials also are notified about unusual activities at the site.

The nearest public schools are about one to two miles from the site. Air monitoring stations and/or emergency warning signs are located near the schools in the vicinity of the site.

Area residents became concerned about environmental issues at Fernald in late 1984 when it was reported that nearly 300 pounds of slightly enriched uranium oxide had been released into the air from a dust-collector system at the plant. The public also learned then that three wells south of the site had been contaminated with uranium since 1981. Several residents in 1984 formed an activist group, Fernald Residents for Environment, Safety and Health (FRESH). The group continues to monitor Fernald activities closely.

In 1985, residents filed a class-action lawsuit seeking damages for emotional stress and decreased property values. The lawsuit was settled, with DOE agreeing to pay a total of \$78 million -- \$73 million for health monitoring and epidemiological studies and \$5 million to local property owners. The U.S. Environmental Protection Agency (EPA) and the Ohio Environmental Protection Agency (Ohio EPA) assumed active oversight responsibilities at the Fernald site.

In 1986, DOE began a remedial investigation and feasibility study to determine the nature and extent of contamination at Fernald, and the best way to clean it up. As the investigation progressed, additional wells were found to contain above-background levels of uranium. The contamination in the groundwater is called the South Plume, and it extends beyond the southern boundary of the site.

DOE agreed to provide bottled water to people whose wells registered elevated levels of uranium. In 1993, DOE agreed to pay the cost of a public water supply system in the area affected by the South Plume.²

Community Concerns

Credibility is a major issue for Fernald officials; past practices, most vividly illustrated by the Cold War's "cult of secrecy," have not inspired confidence among area residents. Even though there has been a warming in the relationship between DOE and the public, DOE and its contractors are judged

solely by their deeds, and not their words. One of the objectives of the public involvement program is to overcome this credibility gap.

After community members learned that the Fernald site was responsible for the release of contamination into the environment, they voiced concern about several issues in a series of meetings held in 1985. They include:

- DOE's credibility and ability to clean up the site
- Lowering of property values because of the contamination
- Long-term health effects of Fernald activities on the surrounding population

To expand and update this information, DOE conducted a series of community interviews in 1986 and 1989. The concerns expressed then were very similar to those first identified in 1985.

Current community concerns include future land use, on- versus off-site disposal of radioactive and hazardous wastes, migration of contaminants during cleanup activities, and cleanup levels.