

HOT SITES TEMPLATE

DESCRIPTION

The template, or matrix, provides a visual reference you can use to plan your site-specific communications work. It is designed to help you assess the likelihood that a site will become contentious, or “hot.” Understanding the potential of a site to become controversial gives you an advantage in preventing serious issues before they arise and in saving time and resources.

USING THE RESOURCE

The template helps you:

- Classify site communities by their potential to become contentious, or hot;
- Identify the appropriate level of effort to mitigate that potential;
- Allocate limited time and resources across your sites according to their potential for becoming hot;
- Identify specific communication needs;
- Develop a communications strategy specific to each site community;
- Set realistic goals and measures of progress; and
- Assess which influencing factors are present and which sites demand the most attention.

Although some sites will become contentious regardless of what you do, this is not a reason to avoid analyzing your communities and planning accordingly. Rather, it emphasizes the importance of such efforts. If you recognize the potential for problems at the site, plan accordingly, and implement appropriately, you can be reasonably confident that you are prepared to deal with the site.

WHEN TO USE

The hot sites template is useful at any time, even if a site has already gone hot. While it is too late to avoid problems at a site that already has done hot, you still have to deal with them. The best way to address existing problems is to figure out why they occurred and focus on correcting the underlying causes. The hot sites template is an excellent tool for identifying the factors that led to problems and where future communication efforts will provide the biggest payoff in terms of lessening controversy.

The hot sites template is most effective if it is applied very early in the Superfund process. To get the most out of the information gathered from preliminary interviews that the SAM (Site Assessment Manager) and, possibly, the RPM (Remedial Program Manager) did with community members. This information can be helpful in identifying the factors that could affect the community’s relationship with EPA. Your research will provide additional information that will help make the template more effective. Refer to your *Community Interviews* and do some research into local news coverage of the site including editorials and letters to the editors, and assess their tone (positive or negative) toward EPA’s involvement at the site.

If the hot sites template is not applied during the PA/SI (Preliminary Assessment / Site Investigation) stage, or if sufficient information is not available, use the template after the *Community Interviews* are held.

 [See Community Interviews, Tab 5](#)

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How to Use

You can use the sample template at the end of this tool to classify and rank your sites according to their communications risk. Write your site names across the top of the matrix in the boxes provided. Down the left side, you will see a list of factors, or site attributes, that are often present at Superfund sites. A **Glossary of Site Attributes** appears at the end of this tab. Refer to it to gain a better understanding of each attribute and to refine the definition to meet your needs.

The attributes are listed in descending order, with those most likely to contribute to contentiousness at the top. Evaluating one site at a time, place a check mark next to any factor that you know or believe to apply to your site. Generally, the more factors checked, the greater the possibility the site will become hot. However, be aware that a single factor, such as incineration or political interest, can by itself make a site enormously challenging. This is a qualitative as well as a quantitative tool.

Completing the template provides a visual guide for developing and targeting communications efforts. Your communication plan should target efforts towards alleviating those attributes that could most easily cause a community to become contentious.

After completing the attributes for each site, rank sites according to how much attention they need. To help with this, the attributes divided into three groupings, according to the combinations of factors most likely to make a site contentious. The grouping at the top contains the most dangerous combination of factors, and the danger lessens as you go down the list. The EPA Region that developed the template chose to use four levels, with level 4 presenting the greatest risk. The breakdown of the guidelines is found at the end of this tab under **Suggested Guidelines for Ranking Sites**. However, since sites are not static, you may find it useful to redo the checklist from time to time (at least once a year) to see if site circumstances have changed. Then, with this new information, you can consider revising your strategy or level of attention for each site.

RANKINGS OR CLASSIFICATIONS

For the CIC (Community Involvement Coordinator): you can use your site rankings to direct resources towards those sites most likely to become hot, and to structure your time and assure that you are handling differing sites appropriately and effectively. You will find a sample **LOE (Level of Effort) Guide**, based on the rankings, at the end of this tab. The following offers a very basic example:

- A Level 1 site presents an “acceptable risk” for minimal communications. You may be able to “babysit” these sites with minimum effort.
- A Level 2 site is slightly more demanding but still does not pose much risk of contention. It should receive a bit more attention to ensure it stays non-threatening.
- A Level 3 site is potentially volatile and merits close watching to keep it from becoming contentious; it might merit some activity on a regular basis.
- A Level 4 site is contentious or has all the makings of becoming so; it will require the most attention and greatest level of effort, perhaps one form of community communications a month.

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Once the sites are ranked, use the information to help develop your communications strategy for each site. This should be part of, or an addendum to, your *Community Involvement Plan*. While developing your strategy, explain your plan to the RPM and get the RPM's "buy in." In most cases, the RPM will be receptive to your ideas.

For the CI (Community Involvement) Manager: To reap the biggest rewards from the template, work it with the entire team of CICs in your Region. You get the added benefit of having all of the Region's sites ranked. With this additional information, the CI Manager can use the rankings to help balance the workload among CICs. In the Region that developed the template, the CI Manager used the template to ensure that the workload was distributed appropriately among the staff. The template is also useful for assigning workload to new CICs and recognizing professional growth. For example, the new CIC might receive only levels 1 and 2, while the senior CIC might receive a load consisting only of Level 3 and 4 sites.

Tips

- Adapt the tool to make it work best for you. Brainstorm with other CICs in your Region to identify communication risk factors and ranking criteria.
- The template is most useful during the beginning stages of work at a site. However, site classification is useful at any time. Review your site rankings at least annually. Consider whether the plans you have developed for communicating at each site level work, and adjust your site rankings and plans accordingly.
- Use the template as part of an overall management strategy.
- Use the site ranking to establish guidelines for communication.
- Remember, there is no way of knowing whether your efforts prevented a situation, and there is no way of knowing whether a situation could have been prevented.

RELATED TOOLS/RESOURCES IN THE TOOLKIT

- [Community Interviews, Tab 5](#)
- [Community Involvement Plan, Tab 7](#)
- [Informal Activities, Tab 20](#)

ATTACHED ITEMS WITHIN THIS RESOURCE

- Attachment 1: Blank Template
- Attachment 2: Glossary of Site Attributes
- Attachment 3: Suggested Guidelines for Ranking Sites
- Attachment 4: Suggested Level of Effort for Site Rankings

 [See Community Involvement Plans, Tab 7](#)

ATTACHMENT 1: BLANK TEMPLATE

Site factors are listed in descending order and grouped into three categories according to importance. Insert your site names across the top and use this template as it appears, or use it as a guide to develop your own. An electronic version is included on the disk. Technical factors appear in boldface type.

Attribute/Site													
Politics													
Hostile PRP													
Media													
Location													
Demographics													
Staff Turnover													
Slow Action													
Economics													
Site Security													
State History													
Land Use													
Contaminants													
Inconsistent EPA Policy													
Activist PR													
Community Perception													
Local Agenda													
Complexity													
Poor EPA Communication													
Local Government Initiative													

ATTACHMENT 2: GLOSSARY of SITE ATTRIBUTES

Note: The following are provided to help you understand the criteria assigned to the various site attributes or characteristics. The criteria are not mutually exclusive and may overlap. They are provided as a guide only; you should develop your own interpretations as well as the manner in which you will apply them before proceeding.

ACTIVIST PR: Public relations activities undertaken by local, regional, or national activist groups. As used here, it is assumed to be negative: the more of this you have, the more contentious the site will be. If there is negative activist PR directed at your site, mark this characteristic on the template.

COMMUNITY PERCEPTION: The view the community has of the site, of Superfund, and of EPA. Also consider the community's perceptions on environmental justice as applied to them. If you are aware of negative community perceptions, mark this characteristic on the template.

CONTAMINANTS: Some contaminants, such as dioxin, are more emotionally charged than others and, therefore, have an alarming effect on residents. Some chemicals may be commonly accepted, but can be more harmful than the more well known chemicals, which means that you may encounter problems getting people to understand why EPA is working in their community. If emotionally charged contaminants are present, or if you sense a consensus of community concern over the contaminants, mark this characteristic.

DEMOGRAPHICS: Concentrations of young children or elderly near a site generally mean higher levels of concern. Higher education levels tend to bring higher levels of public interest, involvement, and even political pressure. The predominance of home owners or renters typically brings different interests and concerns. Now that environmental equity has become a national issue, the population's racial and socioeconomic makeup and location (urban, suburban, rural) will have an impact on Superfund involvement at sites. If any of these demographic factors that generally lead to high concern or interest at a site are present, mark this characteristic. Also mark this characteristic if some unique aspect of the population surrounding your site exists and you suspect it will lead to high interest.

ECONOMICS: Does Superfund threaten the well being of a major employer or the community's tax base? Is there someone or some entity who wants to develop this site and who views Superfund as an obstacle? Does the community see the Superfund designation as an opportunity for a windfall if they can force EPA to buy them out? Are property values a major concern (they usually are)? Is the viability of the community's business district a consideration? If questions like these are an issue, mark this characteristic.

HOSTILE PRP (Potentially Responsible Party): Some PRPs will step up to the plate, accept responsibility, and work with EPA. More often, however, the PRPs will fight EPA, even while presenting a facade of being cooperative. Most will mount some level of public relations activities against what EPA is trying to do—usually with information that is skewed or inaccurate. Some PRPs may become very aggressive, to the point that you cannot match their resources or level of effort. Some may attempt to threaten the community with layoffs or shut down; some may harass employees or even concerned citizens who cooperate with EPA. If such is the case in your community, mark this characteristic on the template.

INCONSISTENT EPA POLICY: This tends to become more obvious as the process evolves. It refers to EPA's inconsistency on its decisions, actions, staffing, and so forth. It can be one of those things that will turn a neutral or positive community into a negative one. If this is an issue, mark this characteristic on the template.

LAND USE: Future use of the site is generally a major concern within the community, and if EPA has not taken this into account in its planning, land use can become a major contributor to contention. Mark this on the template if land use is an issue at your site.

LOCAL AGENDA: Various elements within the community may have their own designs on the site. They may have ideas of how they can further their causes, which may or may not relate directly to the site, by becoming actively involved. Private citizens often see the site as a way to gain power within the community. It is possible to have multiple agendas at work at the same time, even multiple agendas working at odds to each other. If local agendas are apparent at your site, mark this characteristic on the template.

LOCAL GOVERNMENT INITIATIVE: Local governments may have their own designs on the site that might conflict with EPA's objectives. This may or may not be the same as a local agenda, but it is certainly different from politics. If this is the case, mark this characteristic on the template.

LOCATION: The size of the "affected community" directly impacts the level of community involvement efforts. For example, when a large population is at risk, the task of keeping everyone informed is greater (increased fact sheet mailings, more inquiries, larger and more frequent meetings). Proximity to schools, play grounds, hospitals, nursing homes, or churches increase the potential for contention or, at least, citizen involvement. Consider whether site location may lead to greater involvement or concern over the site, and if so, mark this on the template.

MEDIA: The level of media interest has a direct impact on how hot a site may become. Not all reporters are as objective as we would like to believe. At most hot sites, media attention is very high, demanding increased media relations by the CIC. This level of attention does not necessarily mean interest from a lot of media outlets; it could mean a lot of interest from just one major outlet, such as a very popular and trusted local newspaper. Couple this with a negative bias from the beat reporter, and you have the makings for a contentious site. If the level of media interest in your site is high or coverage seems negative, mark this on the template.

POLITICS: Local and state politicians often see Superfund sites as their ride to bigger and better things. The interest and involvement of local, state and/or federal officials impacts EPA's progress at sites. Intense political interest will inevitably create a hot site, and should be marked on the template.

POOR EPA COMMUNICATION: Nothing can transform a neutral or positive community into a contentious one faster than this. Citizens want and have a right to know what a government agency is doing in their community, why they are doing it, and what it will mean to them and to their quality of life. EPA sometimes makes the mistake of assuming that they do not care, that they will not understand, that it is "just business as usual," that it is not an issue, or should not be an issue, all of which leads to controversy, lack of trust, and contention. Unfortunately, this is something that evolves over time. However, you can look at what was done during discovery, site assessment, and the initial stages of the RI (Remedial Investigation) to get a good idea of what confronts you. If EPA has not actively communicated with local residents, mark this characteristic on the template.

SITE SECURITY: This is almost always a concern. Is it easy for people, especially kids, to get onto the site? This often ties in with perception—if the residents perceive that they are at risk from any level of exposure, ease of access becomes an issue regardless of whether they are actually at risk. Until some form of security is installed, such as a locked fence around the site, this will be a bone of contention, and should be marked on the template.

SLOW ACTION: A recurring issue at many sites is the long time it takes EPA to clean up a site. The public's perception of "wasted time" can impact EPA's actions at sites. Again, this is not always evident up front, unless there has been PRP propaganda, activist PR, or other factors at work. If slow action is a problem or is perceived to be a problem by local residents, mark this characteristic on the template.

STAFF TURNOVER: Many residents complain that EPA turns over staff too often and that they end up having to train the new people. It is not unusual to find citizens with more site knowledge than team members. Be alert for this as the site moves through the pipeline. If there has been a great deal of turnover at your site, mark this characteristic on the template.

STATE HISTORY: If your initial research reveals state activities that were ineffective, or that residents disapproved of, you may suffer a transfer of that sentiment and find yourself with a contentious, or at least distrusting, community before you even get started. If this is the case, mark this characteristic.

TECHNICAL COMPLEXITY: The more technically complex a site, the more CI efforts are needed. For example, sites having multiple operable units are more difficult for citizens to understand, take longer to complete, and require more overall communications. If your site is technically complex, mark this characteristic on the template.

ATTACHMENT 3: SUGGESTED GUIDELINES FOR RANKING SITES

The following are provided as a guide; you are encouraged to develop your own strategy for ranking sites.

Sites are ranked according to how many and which factors are present at each site:

- Level 4 = 4 hits from the top category; or 3 hits from the top category + 1 or more from the middle category
- Level 3 = 0 hits from the top category and 4 or more hits from the middle category; or 2 hits from the top category and 3 or more from the middle category
- Level 2 = 0 hits in the top category, 2 or fewer hits from the middle category, and 0 to 5 hits from the bottom category
- Level 1 = Any combination of hits from the bottom category alone



ATTACHMENT 4: SUGGESTED LEVEL of Effort for Site RANKINGS

Level 4: some form of interaction monthly

Level 3: some form of interaction quarterly

Level 2: some form of interaction semiannually

Level 1: some form of interaction annually

Interactions include but are not limited to:

- Fact sheets
- Public meetings
- Public availabilities/poster sessions
- Workshops
- Phone calls
- Informal visits
- Conference calls