

Chapter 28 Community Involvement

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28.1 Introduction

Community involvement can be an important aspect of the risk assessment and risk management process. Participation of local stakeholders, at various levels and in various forms, can help ensure a better understanding of the risk assessment results and will promote buy-in to the selected risk reduction strategies. Encouraging and facilitating community involvement also is sometimes required by law.

This chapter provides a broad overview of community involvement in air toxics risk assessment and risk management and identifies helpful references on this topic. Also included throughout this chapter are descriptions of successful air toxics projects and programs where community involvement was a central component of that success.

This chapter describes the key tools, resources, and other considerations for an effective study area-specific approach. It is not, however, intended to provide all the information about conducting community involvement activities. If additional information is needed, contact the community involvement specialist for your agency.

28.2 Why is Community Involvement Important?

When performing an air toxics risk assessment in a particular geographic area, the **community** is often thought of as the people who live within the area of impact of air toxic sources. However, other parties in the area, such as local industry, also may consider themselves part of the community.

In addition to the people who actually live and work in an area, a number of other stakeholders also may have a stake in the community's concerns (e.g., local officials, health professionals, local media). It is often helpful, when dealing with a community, to keep in mind that many different people (not just the people who live there) may have an interest in the risk assessment and management work being undertaken.

As noted above, many laws recognize and accommodate the idea that government decisions should be open to citizen input before a decision is finalized. This is realized through the required public meetings and public comment periods associated with many government actions. For example, the Clean Air Act (CAA) has a number of requirements to provide an opportunity for the public to review and comment on Agency proposals. In some cases, the public is brought in at an even earlier stage.

When risk assessors and risk managers have the opportunity to do so, they should consider including the public as early as possible in the process. Doing so can lead to some very positive benefits. For example, if the community participates early on and throughout the process, they will be in a better position to understand what assessors and risk managers are doing, and there is a better chance that they will believe that the work being done is in their best interest. The process works best when the community appreciates that assessors and managers are working with them and respecting their input (keeping them informed and involved). Ultimately, a community that is involved early on in the process is a community that may be more willing to support the risk assessment process and results. This may, in turn, foster the development of risk reduction strategies the community as a whole can live with and have a stake in.

In contrast, excluding the public from the process may result in community resentment and rejection of even a sound risk assessment and risk management approach. A “guardian-like” attitude toward the community that treats people as unknowledgeable and incapable of meaningful participation does not foster trust and can eventually undermine the process.

In addition to fostering the trust and acceptance of the community, there are many other positive reasons for early and ongoing involvement. For example, important unrecognized sources of emissions and exposure pathways may be identified through the community involvement process. Ultimately, it is important to recognize that community members know their community and understand the types of solutions that will be most accepted – after all, they live there!

28.3 When to Involve the Community

When appropriate, community involvement should begin at the earliest possible stage and span the entire risk and assessment and management process. The level of participation that community members have in some of the more technical phases of the assessment may be tailored to their background, expertise, and interest; however, this does not mean the community cannot serve an important role in the technical phase, as well. The approach taken, as well as the assumptions and limitations of the analysis, should be clearly explained to the community and their input should be valued in return.

For certain CAA requirements, the question of when to involve the public is established by law. For example, in the Title V permitting process the permitting agency must provide a public notice and an opportunity to comment on a draft new or revised permit when:

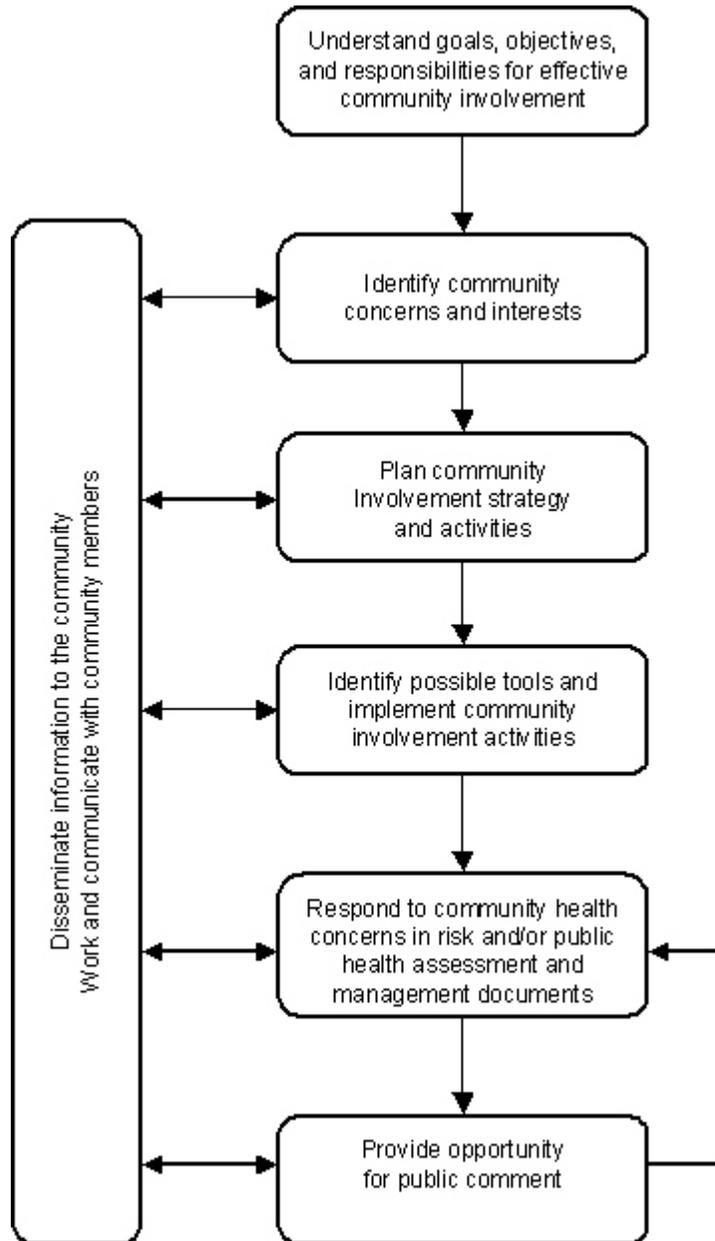
- A facility applies for its first Title V permit;
- A Title V permit is renewed (5 years after issuance);
- The permit is reopened because there is a material mistake in the permit or an update to the permit is needed because of new requirements (review is limited to the part of the permit that is being revised); and
- The facility makes a significant change in its operations and applies for a revision to its permit (review is limited to the part of the permit that is being revised).

For a community-level effort that may include non-regulatory aspects, on the other hand, a community involvement plan will need to be tailored to specific local needs, particularly if the ultimate risk reduction efforts will likely involve voluntary action on the part of industry and/or citizens. As noted above, involving the community at the beginning of and throughout the process will greatly enhance the likelihood that the air toxics risk reduction plan will receive community support (even if the community does not agree with all aspects of the analysis).

28.4 How to Involve the Community

Many different approaches have been developed for involving the community in a risk analysis and management strategy. Exhibit 28-1 illustrates the general framework used both by some programs in EPA and by the Agency for Toxic Substances and Disease Registry (ATSDR). This framework emphasizes the need for involving the community throughout the process.

Exhibit 28-1. ATSDR's Components of Effective Community Involvement



Source: *Community Involvement in ATSDR's Public Health Assessment Process* (see box of additional references at the end of this chapter)

In identifying community concerns and interests, it often is useful to develop a “conceptual map” of the key organizations and decision-making processes in a community. The map would include information such as who speaks for various parts of the community, who serves in formulating perspectives, and what is the process for obtaining consensus within the community.

TIP: Identify local associations or groups by asking community members, respected “elders,” or other associations. This also can go a long way in demonstrating a commitment to involving and mobilizing all stakeholder groups, which helps to build trust and creates a more successful community-involvement process. *But*, in seeking out community members, do not rely solely on existing community organizations. Very often community members are not well organized or represented by existing groups. Just because there is not an organization or group in the study area does not mean that you can bypass that part of the community.

28.4.1 Understand Goals, Objectives, and Responsibilities for Effective Community Involvement

At a minimum, goals and objectives for community involvement should include the following items. All study areas are different, however, and this list is just a suggested starting point (and may need to be expanded).

- Earning trust and credibility through open and respectful communications;
- Including the community in the design and implementation of risk assessment and risk management;
- Helping community members understand what the process involves;
- Assisting communities in understanding the possible health impact of exposure to air toxics;
- Informing and updating communities about risk management activities; and
- Promoting collaboration between decision-makers, communities, and other agencies and stakeholders when carrying out risk management activities.

To reach these goals and objectives, the following key principles are important:

- **Be aware of confidentiality and privacy issues.** Any personal information that analysts or decision-makers receive from community members should be respected, as appropriate.
- **Be aware of special needs and cultural differences.** When conveying information about air toxics and the risk management process, agencies should be aware of non-English speaking community members and other citizens who may need help in understanding complicated messages. Also, be sure to consider cultural symbolism. There are notable examples of the use of a symbol that is acceptable in one culture but that has an unacceptable meaning in another.
- **Maintain effective communication.** As part of the trust-building process, analysts and risk managers should keep community members informed of progress, opportunities for community involvement, how community input will be used, how community members can help to reduce exposures, and upcoming issues and events.

TIP: Local public health providers, such as county health departments and hospitals can be a key partner in the risk analysis and management processes. These organizations often have resources (staff and funding) that can be used in community health activities. Because they are locally based, involving them as key partners in the process can create strong local leaders to promote sustainable activities once a study is complete.

- **Respect community knowledge and values.** It is important to recognize that community knowledge can provide valuable information for the deliberative processes of risk assessment and risk management and potentially help to address data gaps. It is particularly important to try to understand people's interests (what they care about) during the process (more discussion of this subject is provided in the next section).

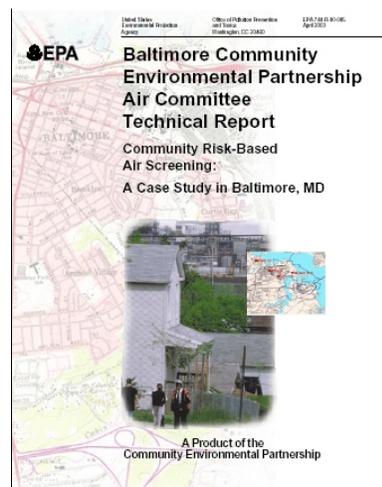
28.4.2 Identify Community Concerns and Interest

One important activity that risk assessors and risk managers can do at the outset of any study is simply to listen to the community. Since their concerns may or may not match those of the assessors and managers, the initial phase of community involvement often involves a fair amount of listening and discussion to help both groups develop a common understanding of what will and will not be studied during the course of the assessment. In those instances where a community concern is outside the scope of what can be studied (e.g., occasional combined stormwater/sewer overflows that cause odors), a willingness on the part of the assessment team to at least help identify resources or connect them to agencies that can address these concerns will go a long way to building trust and credibility. Not listening and not responding to community concerns at the outset may make the process of air toxics assessment and risk reduction more difficult in the long run and may set expectations that are ultimately not met.

28.4.3 Plan Community Involvement Strategy and Activities

Planning a community involvement strategy and activities is one of the most critical components for effective community involvement. The type and nature of communication and involvement activities will depend on (1) the needs and interests expressed by the community during the previous stages, (2) the potential public health issues, and (3) the resources available for communication and involvement activities. Exhibit 28-2 provides a broad list of issues to be considered when developing a community involvement strategy. Not all of these issues must have solutions initially; however, they may need to be addressed eventually.

Community Involvement Example. *Southern Baltimore & Northern Anne Arundel County Community Environmental Partnership (CEP).* In 1996, the residents, businesses, and organizations of five Baltimore, MD neighborhoods joined with local, State, and Federal governments in a CEP to begin a new effort to find ways to improve the local environment and economy. This CEP conducted a comprehensive screening of the cumulative concentration of air toxics from all the industrial and city facilities in and around the neighborhoods and developed a first-for-Maryland survey of cancer incidence at the neighborhood level. Based on this work, the CEP began work with local facilities on pollution prevention. The work of the Baltimore CEP was a learning experience for all of the people who participated. The Partnership tried a lot of new things - some of them worked and some didn't. Lessons learned from this work were carefully documented. The risk screening methodology and lessons learned are being translated into a how-to manual for community use. For more information on this manual and other CEPs, see <http://www.epa.gov/oppt/cahp>.



28.4.4 Identify Possible Tools and Implement Community Involvement Activities

An enormous number of tools and activities exist that risk assessors and managers can use to encourage community involvement – more than can be described here (the additional resources listed at the end of this chapter, however, should provide most of any team’s needs in this regard). They range from the simple phone call, to block parties (at which food may be provided), to the complex mapping of emissions sources and populations. How many and which tools and activities should be used or initiated for a given situation depends on the phase of the risk or public health assessment and management process, the level of community interest, and the degree of hazard a study area poses. The formation of a partnership with stakeholders or community-based coalitions can be an effective way to involve the community, access technical expertise, achieve consensus, leverage resources, and obtain results.

Exhibit 28-2. Issues to Consider When Developing Community Involvement Strategies

Community health concerns:

- How many community members are concerned about the study area?
- What is the level of the community’s concern?
- Is the level of community concern higher (or lower) than the actual risk would suggest?
- Are community concerns unknown?
- Would a physician enhance outreach at community meetings?
- Is information/outreach/health education available now or can this wait until reports are generated?

Demographics:

- How many community members are potentially affected?
- Are there any potentially sensitive populations that may be exposed?
- Do socio-demographic data suggest need for additional resources, such as translation?
- How do the community members receive information (e.g., newspaper, radio, word-of-mouth)?

Community interest in the risk assessment and management process:

- How involved in the process would the community like to be?
- How would the community like to be kept updated and informed (e.g., newsletters, e-mails)?
- How many community groups or activist groups are involved? How active are they?
- Should the risk assessment/management team facilitate the creation of a community group if one has not been formed?
- Can information be disseminated at cultural centers? Informal gatherings?

Media support:

- What has the community already heard from the media? Are there misconceptions that need to be dispelled?
- Will media support require more community involvement resources than usual?

Support of the community:

- Are there Native American communities affected by the pollution? Should a relevant agency be involved?
- Does the pollution involve an environmental justice issue, air toxics “hot spot,” or other type of special sites?
- What past experiences has the community had with “the government”? Other agencies?
- Is there a higher than average need for resources, such as for more frequent community updates?
- How active will any regional agency representatives or other agencies be in community involvement efforts?

**Exhibit 28-2. Issues to Consider When Developing Community Involvement Strategies
(Continued)**

Public health:

- Is the study area a designated public health hazard? Is hazard acute or chronic?
- Are environmental health risks largely unknown?
- Is the study area considered a high priority? By whom?
- Is there already some risk or health outcome results? Are biological data available?
- Is a health connection plausible between contaminant exposures and community health concerns?
- Are data available for review now ? When will they be available?
- Are there toxics reduction steps already in process?

Community culture and setting:

- What are the current community priorities and projects?
- What are the community organizations?
- Who are the community leaders (unelected)?
- What activities constitute community life?

Other:

- How many people on the study area team? Does everyone know their role?
- What is the time-frame for report development and communication?
- Will any special clearances will be required? At what levels?
- Will document or graphics development resources be needed?
- Are there schools or locations where community meetings can be held?

28.4.5 Provide Opportunity for Continued Public Interaction

While a risk assessment is underway, primary communication and involvement goals include updating the community on the status of the assessment, obtaining ongoing feedback on the process, obtaining additional information as needed or available from the community for the assessment, and recommending public health actions, if needed, about how community members can reduce exposures. Throughout this process, the risk assessment/management team should continue to listen to community concerns and clearly explain how they will respond to these concerns. The team also should leverage community outreach resources whenever possible. For instance, federal agencies, state health and environmental agencies, local health departments, citizens' advisory groups, and medical advisory groups may have funds for involving community members in the risk assessment/management process. Collaborating with partner organizations can strengthen community outreach depth and coverage.

Generally, community involvement strategies are situation-specific – risk assessment/management teams should determine which community

**Non-English Speakers and
Other Special Needs?**

To ensure the participation of everyone in the community, agencies often use one or more of the following strategies:

- Offer translators and signers at community meetings, and check for wheelchair accessibility.
- Provide additional sessions of meetings that are offered exclusively in the community's secondary language(s).
- Seek out advocates for the severely disabled or others with special needs.
- Provide education and outreach materials in both English and secondary languages.
- Develop understandable and culturally appropriate messages and materials.

involvement strategies are appropriate given the potential seriousness of the risk, the abilities and involvement of the community, and the resources available for communication, training, and outreach. If resources for community outreach are limited, the team may wish to consider how they can best prioritize resources for community involvement.

When resources are limited, the team should look for community outreach opportunities during other community activities, if it would be culturally acceptable. For a determination of cultural acceptability, ask community leaders or “trusted elders.”

Finally, some community analyses foster highly interactive relationships with community members and other stakeholders. For example, the risk assessment and risk management teams may establish ad hoc working groups to work on specific issues. These groups may include advisory members from the community or their representatives (e.g., community consultants) and may be more or less formal, as the circumstances require.

28.4.6 Release of Risk Assessment and Risk Management Documents

At the end of the analysis phase, the next stage of community involvement generally begins (i.e., after a draft risk assessment is written). Since the process of data gathering, analysis, and risk assessment preparation can take many months to years, community interest may have decreased significantly. However, once the risk assessment is ready for release, public interest often peaks again. To help ensure a fair and balanced release of information, the risk assessment/management team and their partners may consider using a more formal process to release the risk assessment. For example, the team may release the draft for a period of time for people to read and comment. During the review period, meetings may be held to help describe the results and how the analysis was done. Once the risk assessment document is finalized, there typically is a need to communicate the key results, limitations, and recommendations through a variety of materials including fact sheets, press releases, public meetings, and websites. The risk management strategy may be presented in a similar fashion, with a draft and final document presented to – if not also partly written by – the community.

If an agency or other parties will be conducting any follow-up activities in the area (such as additional environmental sampling or emissions monitoring, cost analyses, health education, health studies), then additional appropriate community involvement may be planned.

Additional References

Public Health Assessment Guidance Manual (2002 Draft Update) describes the process that ATSDR uses to sort through the many hazardous waste sites in the U.S. and to determine where, and for whom, public health actions should be undertaken. Chapter 4 addresses community involvement and communication. See www.atsdr.cdc.gov/HAC/PHAManual/cover.html.

The Annual EPA Community Involvement Conference brings together public participation and community involvement professionals from across all EPA programs, as well as their local, State, Federal, and tribal partners. Conference presentations are designed to emphasize the process of public participation and community involvement by focusing on techniques and approaches used in EPA's national and regional community involvement programs. See epancic.org for upcoming conferences as well as the proceedings of past conferences.

Public Involvement in Environmental Permits: A Reference Guide (2000) at www.epa.gov/permits/publicguide.htm was developed by EPA to help make it easier for state and local agencies to facilitate public participation in environmental permitting decisions for businesses and facilities under your authority. This guide provides basic information about public participation requirements and gives examples under several major permits issued by EPA's air, water, and waste programs. This guide also details what public participation activities are required under these programs, as a minimum, as well as those suggested activities that serve to augment the regulatory requirements.

Air Toxics Community Assessment and Risk Reduction Projects Database at yosemite.epa.gov/oar/CommunityAssessment.nsf/Welcome has been compiled to provide a resource of planned, completed, and ongoing community level air toxics assessments across the country. By sharing information about efforts at the local level to measure, understand, and address air toxics emissions, this database will help ensure that communities designing and implementing their own assessments will be able to build upon past efforts and lessons learned.

Community Involvement in ATSDR's Public Health Assessment Process (2002) provides an overview of how ATSDR works to involve communities in the public health assessment (PHA) process. It describes how ATSDR develops community involvement strategies and plans community involvement activities.

Additional References (continued)

Superfund Community Involvement Web Site provides communities with a range of tools, including guidance documents and other information to increase their understanding of Superfund and the services available to them (e.g., the Technical Outreach Services for Communities Program, Technical Assistance Grants). See www.epa.gov/superfund/action/community/index.htm.

Superfund Community Involvement Handbook (2002) presents legal and policy requirements for Superfund community involvement and additional suggestions for involving the community in the Superfund process. This handbook also provides guidance for community involvement outside of Superfund. See www.epa.gov/superfund/tools/cag/ci_handbook.pdf for more information.

Community Culture and the Environment: A Guide to Understanding a Sense of Place (2002) addresses the social and cultural aspects of community-based environmental protection. The document offers a process and set of tools for defining and understanding the human dimension of an environmental issue. The report, published by EPA's Office of Water, is available on the web from EPA's publication Web site. The report number is EPA/842/B-01/003.

Community Air Screening How To Manual: A Step-by-Step Guide to Using a Risk-based Approach to Identify Priorities for Improving Outdoor Air Quality (to be published in 2003) is being developed by the EPA's Community Assistance Technical Air Team to make air quality assessment tools more accessible to communities. It will present and explain a step-wise process that a community can follow to form a partnership, identify and inventory all local sources of air pollutants, review these sources to identify the hazards and potential risks, and set priorities and develop a plan for making improvements.

References

1. Agency for Toxic Substances and Disease Registry (ATSDR). 2002. Public Health Assessment Guidance Manual (Update): Draft for Public Comment.. Available at: <http://www.atsdr.cdc.gov/HAC/PHAManual/cover.html>.