



Community Involvement Plans

Description

A Community Involvement Plan (CIP) is a site-specific strategy to enable meaningful community involvement throughout the Superfund cleanup process. CIPs specify planned community involvement activities to address community needs, concerns, and expectations that are identified through community interviews and other means.

The CIP is both a *document* and the culmination of a *planning process*.¹ As such, the CIP provides the backbone of the community involvement program and serves as a useful reference that the Site Team often turns to during the Superfund cleanup for advice on appropriate activities for community involvement. A well-written CIP will enable community members affected by a Superfund site to understand the ways in which they can participate in decision making throughout the cleanup process.

Required Activity?

Yes. The National Contingency Plan (NCP) requires the lead agency -- in the case of the former Hardesty Federal Complex, U.S. General Services Administration (GSA) -- to prepare a Community Involvement Plan “based on community interviews and other relevant information, specifying the community relations activities that the lead agency expects to undertake during the remedial response.” The NCP specifies that the CIP must be in place before remedial investigation field activities start, “to the extent practicable.”

The NCP further requires that EPA review the CIP prior to initiating the remedial design (RD) “to determine whether it should be revised to describe

further public involvement activities during Remedial Design/Remedial Action (RD/RA) that are not already addressed or provided for” in the CIP.

For removal actions lasting 120 days or more, the NCP specifies that the lead agency must prepare a CIP based on community interviews and other relevant information “by the end of the 120-day period.” For removal actions with a planning period of at least six months, the NCP requires the CIP to be completed prior to the completion of the Engineering Evaluation/Cost Analysis (EE/CA).

These requirements are equally applicable to federal facilities and sites using the Superfund Alternative Approach (SAA).

Making it Work

A carefully prepared CIP provides a game plan or road map for the Site Team’s use throughout the cleanup process. The Community Involvement Coordinator has primary responsibility for the CIP, but all members of the Site Team—the Remedial Project Manager or On-Scene Coordinator, CIC, Risk Assessor, the enforcement case team, EPA contractor, state, tribal, or local agency staff, or others—should be involved in the development and implementation of the CIP.

The CIP should be a “living” document and is most effective when it is updated or revised as site conditions change. The CIP document:

- Describes the release and affected areas (a.k.a., “the site”), including relevant history, type and extent of contamination, and environmental exposures and concerns, both related to the site and in a broader sense;

¹Hellier, Justin, *Planning for Participation: Trends & Opportunities in Superfund’s Community Involvement Plan*, 2010: Report prepared for the U.S. EPA by National Network for Environment Management Studies Fellow. Many of the ideas for this tool were informed by this report.



- Describes the community in a comprehensive Community Profile that includes demographics, local government structure, and any relevant community characteristics;
- Identifies key community needs, questions, and concerns, as well as expectations and unique needs of the community (e.g., translation and disability services) or unique cultural behaviors, customs, and values. This information is typically collected through *Community Interviews* and depicted in the *Community Profile*;
- Describes the need for technical assistance services and, if appropriate, identifies appropriate programs and mechanisms for providing access to *Technical Assistance for Communities*;
- Specifies EPA's planned outreach activities and community involvement mechanisms, including a projected sequence of project milestones tied to site activities (with projected timeframes, whenever possible), and describes the mechanisms that will be used to explain to the public how community feedback is considered during the cleanup process;
- Identifies any additional special services or approaches EPA will use to address unique needs of the community, which may include encouraging the formation of a Community Advisory Group (CAG), providing *Facilitation/Conflict Resolution/Alternative Dispute Resolution (ADR)* services for community meetings or groups, *Translation Services*, or supporting an approach for *Community Visioning* (i.e., allowing open-ended brainstorming for community stakeholders to envision the future potential reuse of the site);
- Allows for community comment on the draft CIP and describes the mechanisms used to receive and consider feedback before issuing the "final" CIP (e.g., formal or informal public comments, community meetings, public meeting, etc.); and
- Describes future plans for updating or revising the CIP.

To get involved in the creation of the Hardesty Complex CIP, contact U.S. General Services Administration at (816) 926-6903 or r6environment@gsa.gov.