PUBLIC INVOLVEMENT HOW-TO GUIDE
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Foreward

Public involvement is a leader's responsibility.

Public involvement is a command responsibility. Therefore, the U.S. Army Environmental Center has created the *Installation Leaders' Guide to Environmental Public Involvement* as a primer for Army staff whose duties require some aspect of pubic involvement concerning installation environmental programs. This guide also should be used by U.S. Army Corps of Engineers District Commanders who are responsible for cleanup activities at Formerly Used Defense Sites (FUDS). It supplements guidance found in Corps Engineer Regulation 200-3-1

According to the Army's Leadership Field Manual, FM 22-100, "Leadership is influencing people—by providing purpose, direction, and motivation—while operating to accomplish the mission and improving the organization." In making use of public involvement, we are often trying to influence stakeholders so that they understand and accept an Army environmental strategy or decision. However, we must remember that the leader's definition of influence includes improvement. Public involvement's goal is not just to convince others that we are right, but also to use the input from the public to improve our decisions.

Public involvement requires purpose. While we don't need to explain every decision or course of action to our stakeholders, public involvement builds trust. By including stakeholders in our decision-making and listening to their input, we give them a reason to become involved with us in a positive way. Over time, that involvement helps build trust, a basic bond of leadership.

Public involvement needs direction. Left without direction, public involvement could be side-tracked by special interests and lead to effects that are not in the best interests of the American public. The process needs to be guided. Installation leaders must communicate the goals, objectives, and metrics associated with its accomplishment. Leaders must check to assure objectives are being met and that the processes being used are providing value to the organization and the public.

Public involvement requires motivation. The best leaders lead from the front. An organizational climate that encourages communication with and strives to understand its stakeholders will generate the best in public involvement. Like any project, though, it has setbacks as well as successes, challenges, as well as opportunities. The test of leadership is to apply the public involvement concept in the right way so that stakeholders and installation staff can overcome the impasses that sometimes develop in trying to accomplish environmental programs.

1.0: Executive Summary

This guide is aimed at the members of an installation's environmental team. These installation leaders usually include the garrison commander, the director of logistics, the director of public works, the director of training and operations, the environmental coordinator, the range manager, the legal advisor, the safety officer, the natural and cultural resources manager, the preventive medicine officer, and the public affairs officer. The U.S. Army Corps of Engineers' project manager for environmental restoration or its resident engineer may also be included on the installation environmental team, as well as any others deemed appropriate.

1.1: Purpose

To establish and execute a successful public involvement program, it is critical we understand the issues that genuinely affect and concern the public, keep them informed of proposed actions that they perceive to affect their health and safety, and provide them opportunities to meaningfully participate in decisions about these actions. Stakeholders are understandably concerned about any actions the Army may take that could affect their health, safety, quality of life or their environment. They often want a voice in such matters, but may not understand the Army's processes that allow them to become involved.

The Army's public involvement programs are planned efforts to involve citizens in the environmental decision-making process. They should be used to establish and foster relationships within the community, proactively inform and interact with stakeholders, and to prevent or resolve conflicts through two-way communication.

The purpose of this plan is to outline how you can identify environmental laws and regulations that apply to your installation, identify required public involvement activities under those laws, and develop a public involvement plan to carry out these activities in a manner that meets the needs of your stakeholders. The end result of which should be public and Army support for technically and fiscally acceptable solutions to environmental challenges.

1.2: Guidebook Structure

This guide is intended to help Army installation staff meet that challenge by providing the basics that guide a public involvement program and by outlining methods for conducting public involvement for a range of environmental issues.

Section 2.0, *Introduction*, will explain public involvement requirements and link knowledge to action by:

- outlining reasons why public involvement in environmental programs is important for Army installations;
- providing synopses of some of the laws that apply to Army installations and the kinds of public involvement activities these laws require; and
- describing how to assemble a strategic planning team that can support the public involvement planning and implementation process.

Section 3.0, *Stakeholder Assessments***,** explains how you can learn more about your community's information needs, concerns, and preferred methods of communications by:

- outlining the types of information you will need to develop an effective public involvement program;
- discussing how to create a clear and comprehensive picture of your stakeholder groups; and
- listing and describing various methods for getting direct stakeholder feedback regarding community concerns, information needs, and communication methods.

Section 4.0, *Public Involvement Planning***,** describes how to establish a public involvement program that can be measured for success by:

- providing a blueprint for conducting public involvement programs;
- identifying goals, objectives, key messages;
- prioritizing stakeholder groups; and
- describing processes for developing execution plans, as well as evaluation methodologies.

Section 5.0, *Risk Communications*, describes additional communications skills necessary for planning and executing public involvement programs by:

- describing a general approach to risk communications and background information and how the public perceives risk; and
- providing information regarding public health and safety communications, as well as environmental justice issues.

2.0: Introduction

It is the Army's ethical and legal responsibility to provide the public with information and the means to impact the decision-making process regarding environmental issues. The first steps in the public involvement process are to 1) know your requirements, and 2) assemble a team to fulfill these requirements.

There are both federal and Army regulations that guide our environmental programs. These laws generally require various levels of public involvement activities that need to be strategically planned and executed by a team of installation representatives. This section outlines the specific federal and Army regulations that drive environmental programs, their associated public involvement activities, and how to establish a team to ensure these activities are effectively executed.

2.1: Federal Environmental Law

The Federal Facility Compliance Act of 1992 states that federal facilities are subject to federal, state, interstate, and local solid and hazardous waste laws. Essentially, this legislation makes federal facilities subject to the same solid and hazardous waste laws that apply to private industry, and it waives the "sovereign immunity" once allowed for federal facilities, meaning they are subject to legal action from state regulatory agencies. Federal facilities may be held liable for civil penalties and U.S. Environmental Protection Agency (EPA) enforcement actions, but not for criminal penalties. Officers of the federal government can be held liable for criminal penalties resulting from violations of some environmental laws.

Several environmental laws with which the Army must comply establish minimum standards for public involvement. The following is a summary of the primary federal laws most likely to impact Army installations and require some level of public involvement. More information on these environmental laws, as well as information on additional laws, is included in Appendix X.

2.1.1: Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

This law outlines the requirements for conducting environmental restoration activities and generally requires the most public involvement activities. It created a special tax that goes into a trust fund, commonly known as the *Superfund*, to investigate and clean up sites where hazardous materials or chemicals are adversely impacting the environment. However, this fund does not pay for cleanup at military sites, as Congress specifically appropriates necessary funds through the Defense Environmental Restoration Program.

There are regulatory requirements for public involvement contained in the National Contingency Plan, depending on what type of action is being taken. See 40 CFR 300.430(c) and 430(f)(3) for remedial actions, and 40 CFR 300.415(n) for removal actions. Installations that are home to CERCLA sites where cleanup is expected to take 120 days or longer are required to prepare a Community Relations or Community Involvement Plan. CIPs are developed based on community interviews

and will outline the effective and measurable execution of the required CERCLA community involvement activities. EPA guidance suggests that depending on the status of your installation, CIPs be written to cover a five-year period and updated every three years. CIP updates are also recommended in the event of a major program shift.

2.1.2: Superfund Amendment and Reauthorization Act (SARA)

This law, passed in October 1986, modified CERCLA. It includes a provision that federal agencies must comply with the provisions of CERCLA, but must fund their own cleanup programs, rather than use funds from the Superfund Trust Fund. It established the Defense Environmental Restoration Program and through that program the Army's cleanup fund, Environmental Restoration, Army (ER,A) account.

2.1.3: Resource Conservation and Recovery Act (RCRA)

This law established a regulatory system to track hazardous wastes from generation to disposal. RCRA requires permits for hazardous waste treatment, storage, and disposal facilities. RCRA public involvement activities are associated with obtaining and renewing permits to operate facilities, and cleanup activities at sites of hazardous waste operations conducted under RCRA rather than CERCLA.

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2.1.4: National Environmental Policy Act (NEPA)

NEPA requires an assessment of virtually all significant federal decisions likely to impact the environment. This act was passed to ensure that decision-makers are aware of the environmental consequences of decisions, and permit the public to comment on both the scope of an environmental impact study and the alternatives under consideration. The Army's requirements are based on the underlying regulations of the White House Council of Environmental Quality, published as Code of Federal Regulations (CFR) 1500-1508.

2.1.5: Endangered Species Act

To comply with the Endangered Species Act, installations planning actions that may have an impact on federal species must consult, formally or informally, with the U.S. Fish and Wildlife Service (USFWS). Documents prepared under consultation may include biological assessments, environmental assessments, or environmental impact statements. Installations must consult with the USFWS if any ongoing or proposed actions may affect plant or animal species covered by this act.

2.1.6: Safe Drinking Water Act

As a supplier of drinking water to customers, an Army installation which operates its own treatment plant is required to notify its customers of how it is meeting specific water discharge requirements and any anticipated plant modifications. It is also required to produce consumer confidence reports.

2.1.7: Clean Air Act

This Clean Air Act requires the EPA publish criteria for determining air quality and information on techniques to control air pollution in the Federal Register, and that copies of this published information also be made available to the general public. It requires each state to prepare plans for notifying the public on a regular basis when air quality does not meet regulatory standards. The state must keep the public informed of the health hazards associated with the air pollution and made aware of measures that can be taken to reduce air pollution levels. Most fixed facilities discharging regulated air pollutants must obtain a permit from the EPA or their state. The application process for new or modified permits usually involves public notice and/or public meetings.

2.1.8: Clean Water Act (Federal Water Pollution Control Act)

This act requires the EPA administrator to maintain a continuing program of public information and education on recycling and reusing wastewater, using land treatment for wastewater, and reducing the volume of wastewater. The law also empowers the EPA administrator to require owners and operators of point sources of water pollution to establish and maintain records of their discharges; report them on a regular basis to the appropriate regulatory agencies; and install, use, and maintain equipment to monitor discharges. All unclassified records must be made available to the public. Opportunities for public hearings must be provided before certain permits can be issued, renewed or modified.

2.2: Army Directives

One Army environmental regulation, AR 200-1, summarizes most of what you must know to meet Army expectations for public involvement. In this publication, you will find descriptions of the Army's most important environmental programs and a list of additional Army regulations, with the directives of the Department of the Defense and other federal agencies. Other Army publications that describe requirements for public involvement is the Installation Environmental Program Management Guide, U.S. Army Environmental Center, 2002, and the US Army Corps of Engineers Regulation for the FUDS Program, 200-3-1.

2.3: Strategic Planning Team

Every person on an installation has the potential to impact public perception of Army activities, through the decisions they make on the job or through interaction within the community. The installation environmental team must work closely together for a public involvement program to succeed. Leaving public involvement planning solely to either the public affairs or environmental staff won't work, as the environmental staff who must assist in implementing the plan and the primary installation spokesperson, the garrison commander, should be leading the creation of it.

It is critical to assemble a Public Involvement Strategic Planning Team. This team should be comprised of people who have the authority to speak on behalf of the installation, who have technical expertise, and or a familiarity with public perception or a history of community interaction. Begin by forming a cross-functional decision-making team that includes:

- a representative of the garrison commander
- a public affairs specialist
- environmental managers (could be more than one)
- a medical department representative

Including an installation employee not functionally responsible for environmental matters will help provide insight into the communication needs of the internal installation population. For example, you might want to add a member of the union represented on the installation. The team also may need additional resources such as risk communication expertise if a site on your installation has already created controversy or has the potential to generate health concerns. Additionally, if an impending decision could affect the installation's training, testing or readiness mission, participation of other installation staff such as a range management specialist and a safety specialist will be necessary.

3.0: Stakeholder Assessments

Once you understand the public involvement requirements under applicable environmental laws and have a team assembled, it is critical to assess how effectively you are currently meeting these requirements and the information needs and concerns of your community.

An installation's neighbors need to be given the chance to express their concerns and needs. If you give them an opportunity to voice their opinions, they will tell you about their environmental and health and safety concerns, and what they expect the Army to do to address those concerns. This will allow you to proactively respond through the communication channels that are most convenient and effective for them.

Community-based research can answer three questions essential to developing a public involvement effort focused on, and responsive to, the community's environmental concerns:

- What are people concerned about? Information from surveys, focus groups, community interviews and informal community forums can help identify key concerns.
- Where do they get their information? You should identify channels through which people get the information that creates their perceptions.
- Whom does the community consider credible sources of information? The answer to this question varies greatly between stakeholder groups, so it is critical to identify who/what organizations each group respects.

Remember, effectively communicating issues regarding environmental concerns is not solely fact-based. While our messages must be technically accurate, they must be understandable to community members; they must address community concerns; they must be communicated through media used by our intended audiences; and they must come from credible sources. Otherwise, our efforts are not likely to succeed.

The more you understand about members of the community and your installation, the easier it will be to develop a public involvement program that responds to their concerns and gives them a role in making decisions. One way to start gathering information for the plan is to describe the installation's surrounding community in terms of these characteristics:

- Physical – description of communities near installation, obtained from local government or through observation.
- Demographic – occupation, age, education level, household income, family makeup, place of residence and work, and cultural characteristics. This information is available from the U.S. Census Bureau on the Internet or from the local chambers of commerce.
- Behavioral – media exposure, membership organizations, lifestyle characteristics (e.g., what is the circulation of various area newspapers?). This information is

available from marketing research firms, local news organizations, chambers of commerce and development authorities.
- Psychographic – beliefs, values, opinions, and attitudes toward the installation and environmental issues. This information must be collected directly from the community through interviews, focus groups or similar means.

Once you gather information, you can pick up on trends and preferences among your stakeholder groups. You can use this information to develop a larger public involvement plan, that will outline how you will conduct your required public involvement activities and address community concerns in an effective manner.

3.1: Stakeholder Group Identification

To obtain feedback from stakeholders, you first need to have a clear and complete picture of who your stakeholders are. Identifying those who perceive themselves as having a stake in the installation activities is a matter of identifying groups that need to be informed or influenced as opposed to those who want to influence the decision-making process (e.g., activist groups). When making these distinctions, the following questions are useful:

- Who has previously expressed interest in or been involved with this issue?
- Which groups are likely to be affected directly by the operation?
- Which groups are likely to be upset if they are not consulted or alerted to the issue by the installation before they see media coverage of it?
- Which groups should be consulted because they have information that could be useful to the project?
- Which groups would provide a balance of opinions?
- Which groups may not especially want input but do need to know what the installation is doing?
- Are your own civilian and military employees well-informed about the issue?

Some common affected and/or interested parties in installation communities are:

federal and state regulators	elected officials
employees	religious organizations
contractors	ethnic and national origin/heritage associations
unions	residential installation neighbors
nearby business neighbors	public interest, activist groups
emergency response organizations	civic organizations
youth groups	educational and academic organizations
recreational groups	news media
government agencies	professional or trade associations

3.2: Community Interviews

The primary way to collect information regarding public concerns and preferred methods of communication is the community interview process. Although time consuming, face-to-face interviews produce a variety of benefits. Primarily, they give participants the chance to give specific feedback and have their opinions documented and heard.

To initiate this process, the installation staff needs to the distribute letters to neighbors and community leaders explaining that the installation is conducting interviews to determine how its communicating with the public and identify and community concerns. Letters should be distributed to a variety of different stakeholders, who represent the diversity of the community. The recommended number of interviews varies at each installation, based on size, level of public interest, emerging issues, etc. Include the following categories of people in interviews:

- randomly selected neighbors near the installation
- community leaders (bankers, school superintendents, principals)
- influential persons or opinion leaders (church leaders, civic association presidents, etc.)
- environmental advocacy groups
- municipal officials (fire, police, emergency, and disaster planning)
- elected officials (mayor, county executive, health officer, Congressional staffers)
- environmental justice groups
- Native American tribes

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After a week or so, follow up the letter with personal phone calls to determine interest and to schedule an interview.

Limit interviews to 20 to 30 minutes and give interviewees a card with a name and phone number of a person at the installation they can call for additional information. If the same team conducts all of the interviews, the information will be more consistent and reliable. Because using only one interview team is not always possible, all interviewers must coordinate their efforts to collect information. Thank all participants for their participation with a personalized letter and keep them informed about the progress of projects to address environmental concerns.

Some questions to include in the questionnaire:

- How aware are you about site or environmental issues? (Ask them about general topics and let them discuss specifics.)
- What concerns do you have about the installation's impact on the local environment?
- What kind of information do you want from the Army?
- How often do you want to receive information?
- Where do you currently get information about installation matters? About environmental issues?
- Whom do you trust to give you reliable information about the installation?
- Would you like to become more involved in installation activities?

3.3: Telephone Surveys

The objective of public opinion surveys is to obtain responses to uniform questions from a select number of people (the sample) thought to represent the community. Because of the size of most installation communities, professional survey organizations often rely on a sample size of 800 to 1,000 people selected from specific ZIP codes or area codes.

Interviewers can add questions to the questionnaire to identify responses from employees at the installation.

Telephone polls can generate reliable information quickly when a qualified, reputable organization conducts them. Interviews must not be too long or too complex. Pretest questionnaires for bias and to make sure most respondents would understand the questions. Professional polling organizations, universities, think tanks, news media organizations, public relations firms, and advertising and marketing organizations conduct telephone surveys. The capabilities of contracted interviewers should be evaluated carefully before they are retained to assist in canvassing the community. Here are some items to ask for:

- names and phone numbers of two stakeholders who recently made an inquiry (do not include members of the media)
- a sample of the format for reporting results
- verification of their process of selecting participants randomly
- name, address, phone number, and credentials of any subcontractors involved in the project (e.g., telemarketing firms)
- a written research design, including dates for delivering preliminary and final reports
- a copy of the raw data on computer disk
- a valid sample questionnaire

TELEPHONE SURVEYS	
Pros	**Cons**
• quantitative, statistically valid data • opinions obtained from a cross-section of the community • data that allows generalization about wider community values • quick completion of the interview process • baseline results that can be used for future comparisons	• costly • limits the number of questions that can be asked • provides no opportunity for feedback or discussion • requires experts to design the questionnaires and interpret the data • people generally avoid telemarketers

3.4: Focus Groups

Focus groups supplement other types of community research by providing insights into target audience perceptions, beliefs and language. Focus group interviews are usually conducted with a group of eight to twelve people for one to two hours. Using a discussion outline, a moderator keeps the session on track while allowing respondents to talk freely and spontaneously. As new topics related to the outline emerge, the moderator probes further to gain useful insights. Focus group sessions are often recorded or videotaped for later review.

Focus groups can be useful for pre-testing such materials as brochures, newsletters and videotapes before these products are completed. Internal focus groups, comprised of installation employees, can be useful in evaluating how effectively the command

communicates to installation personnel and their family members. Such internal focus groups can also assist the installation in determining the level of resources that should be devoted to on-post public involvement programs.

As with all survey respondents, those selected for focus groups should be typical of the intended target audience. Various subgroups within the workforce or community may be represented in separate group discussions, especially when discussing sensitive or emotional subjects such as health concerns. Installation staff can arrange focus group sessions, but an outside moderator should conduct the session and compile the report. The process for organizing and conducting a focus group includes:

1. Select or hire a moderator
2. Determine the characteristics of the group
3. Develop a recruitment screening script and questionnaire
4. Recruit diverse participants
5. Develop a discussion guide and test materials
6. Coordinate logistics:
    - Find easily accessible location
    - Arrange for compensation, if applicable
    - Provide transportation and child care when necessary
    - Arrange audio or videotaping or both
    - Arrange for transcripts
7. Conduct focus group session
8. Evaluate the results and write a report

4.0: Public Involvement Planning

It is important to distinguish between public involvement plans and tactics. Plans include the whole program – a detailed set of goals and objectives, specific strategies, a variety of tactics or tools, and an evaluation process. Tactics are the methods and tools for carrying out the strategies outlined in the plan. A public involvement plan is a strategy; a visit with local reporters is a tactic or tool.

With your public involvement requirements identified and your stakeholder assessments complete, you can begin to develop an execution strategy, or public involvement plan, to comply with laws and regulations and to meet your community's needs.

The following is a step-by-step process for developing a public involvement plan. It affords you the opportunity to identify and learn about your stakeholders and audiences, determine what you want to communicate to them, and how you will carry out the communication.

4.1: Define Goals and Objectives

Before you proceed through the information-gathering phase, you should identify what you would like to achieve with your public involvement program. These communication goals should be written in a manner that supports larger installation and Army goals and objectives, as well as respond to feedback garnered through the stakeholder assessment process.

Your objectives are the deliberate steps you must take to accomplish the broader goals. They describe the outcome, but not the specific activities involved in obtaining it, as you will design strategies for getting there later. Objectives are written to articulate what your program is intended to do. There may be several objectives for each goal. They should be specific, attainable, prioritized to direct the allocation of resources, measurable, and time-specific.

Example:

> **Goal**: To increase opportunities for stakeholders to participate in environmental decision-making.
>
> **Objective**: Determine interest in the establishment of an installation Restoration Advisory Board
>
> **Objective**: Hold quarterly environmental forums to discuss environmental issues on the installation with community leaders.

4.2: Identify and Prioritize Stakeholder Groups

The installation's audience is not a single, monolithic group. There are many publics, and each has its own interests, concerns, information needs, and priorities. Each installation must allocate its resources efficiently in planning a community involvement effort that

addresses all appropriate audiences and their concerns. It is critical to identify all interested stakeholder groups and prioritize them based on their potential impact and their concerns. Most likely the identification process was completed during the stakeholder assessments. However, it is prudent to review your list and update as necessary. Overall, this will help you address your information requirements, thus ensuring they receive accurate information through the Army, rather than inaccurate information through alternative sources.

4.2.1: Prioritize Stakeholder Groups

Segmenting and categorizing the community into primary and secondary audience groups will lay the groundwork for an effective program and for later evaluation of effectiveness.

Use data collected in the stakeholder assessment process to develop profiles of your stakeholder groups. Use the information to create a matrix that lists the specific concerns or interests of each group and the group's primary or preferred sources of information.

Example:
Group – Adjacent homeowners
Information needs/concerns – lead levels in soil of a nearby playground on land that was previously used as a shooting range
Preferred information sources - direct mail, speaker's bureaus, community newsletter

Once you have listed potential audience groups and evaluated their concerns, you should categorize them as either primary or secondary. There may be several primary audience groups with which you may want especially to emphasize communicating because of their influence on others. For example, employees influence their families who, in turn, may directly influence their friends and neighbors with information they share about the installation.

Secondary audience groups are those that influence the primary audience groups. For example, local news coverage may influence the opinions of installation neighbors. Installation employees are often an important secondary audience group because they directly affect how their families perceive facility operations.

4.3: Develop Key Messages

Consistent use of key message points in communications will add credibility to public involvement programs and an installation's overall mission.

Based on community interview results, the concerns identified for your stakeholder group, and your overarching communication goals, develop key message points for your community involvement program. These key messages will be woven into all communications with stakeholders, regardless of the specific issue at hand. To develop key messages, brainstorm the following questions:

- What are the two or three or four most important things we need to communicate and emphasize?
- What are some different ways to talk about this information?
- Will our stakeholders understand these messages and how will they react? Will the message:
  - attract attention?
  - inform?
  - educate?
  - persuade?
  - initiate dialogue?
  - affect attitudes, perceptions or behavior?
- How does the message address community interests or concerns identified in the community involvement plan?

4.4: Identify Tools and Tactics

The key to successful and thorough public involvement is using and employing an appropriate combination of tools and tactics in a targeted and measured way that ensures key messages are effectively disseminated. It is important to ensure that your public involvement program uses a wide array of tools and tactics – one tool does not work for all and will not reach all audiences. Additionally, it is critical that each installation is familiar the types of community involvement tools and tactics that are available to assist in complying with both the letter and spirit of the environmental laws and regulations described in Section 2. A document with specific guidance for best practices in developing and using these tools and tactics, as well as stakeholder assessments, is the EPA Superfund Community Involvement Toolkit. It can be found online at http://www.epa.gov/superfund/tools/.

4.4.1: Public Notices

Public notices are published in the major area newspapers notifying citizens of opportunities for public participation, specifically announcing the release of technical documents and dates of public comment periods, meetings, etc. Public notices should not merely be relegated to a small legal notice buried in small type far back in the local newspaper. Public notices should be published as display ads, noticeable, easy-to-read and placed in frequently read sections of the major daily and smaller newspapers.

4.4.2: Public Comment Periods

Formal public comment periods are held to provide the public opportunities to review and comment on environmental program documents. These may be held as required by law and/or based on individual needs and potential community impacts. Public comment periods generally last at least 30 days. Complex or highly controversial issues should have extended public comment periods. They are generally advertised through public notice. Other effective means of advertising these and other public involvement activities include public service announcements that are submitted to and aired by local radio and television stations free-of-charge. Written public comments are accepted directly by an official point of contact, as are comments offered at official public meetings.

4.4.3: Public Meetings

Public meetings are generally held to support public comment periods and afford the public an opportunity to submit written or oral comments. Public meetings are structured around an agenda outlining the order of any speakers, briefings, questions and answer sessions, and opportunities for official public comment. The meeting date and time should be well advertised in the news media, through public service announcements and newspaper display advertisements, as well as communicated directly to interested stakeholders. Transcripts of the meeting should be recorded, made public, and filed in the administrative record locations.

4.4.4: Public Availability Sessions

Public availability sessions are types of public meetings that facilitate face-to-face communications between the community and the Army. Public availability sessions provide additional avenues for public participation and allow Army officials to interact with the public in a less formal and, often, a less adversarial setting. They can be used in lieu of public meetings as long as formal public comments can be recorded. They do not include agendas or briefings, and generally involve an informal poster session and provide community members opportunities to have one-on-one interaction and conversations with Army officials and regulators. Site activities and public interest will determine the scheduling of these events, as these are not required under environmental law. They should be advertised in the community similar to public comment periods and meetings.

4.4.5: Administrative Record

An administrative record is the complete record of all decision documents developed and official correspondence transmitted for an environmental program and is required by the environmental laws cited earlier in this guide. Hard copy and on-line versions should be maintained.

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4.4.6: Information Repository

An information repository is similar to a very small library. It contains documents specific to an installation and remediation efforts at the site. The repository includes information materials such as fact sheets, brochures, and press releases. It also generally is used as a location where the public can access technical documents for review and comment. Common places for information repositories include local libraries, colleges/universities, community visitor's centers, etc.

4.4.7: Information Products

Installations can produce several types of information products to communicate technical information to the public in language that is easy to understand and ways to get additional information. They can highlight various topics of interest such as historical and background information, status updates, technical milestones, and success stories. They can be distributed at public meetings or at special events, such as site tours, as well as be made available at libraries or other public places of interest. It is suggested that branding techniques are used to create these products and that similar visual elements, colors, etc., are carried throughout the graphic design for each type of information product to create an identity for your program.

These branding elements can also be incorporated into press release templates, your Web site, any display ads, etc. Types of information products include:

- fact sheets
- newsletters
- brochures
- briefing charts
- annual reports
- videos

4.4.8: Success Stories

The installation should capture its success stories and communicate them through the appropriate channels as press releases, feature stories, or simple summaries. These stories can be marketed to media outlets, elected officials, regulators, and internal audiences. They should also be passed up the chain of command to further promote Army successes in such products as reports to Congress.

4.4.9: Media Advisories/News Releases

Media advisories are distributed to news media in advance of an event in an effort to encourage media attendance. Media advisories specify the who, what, when, where, and why of an event rather than narrate a story about an event. News releases tell a story about an event through the use of the key message points. News releases communicate important information such as the completion of program milestones and official quotes.

4.4.10: Site Tours

Site tours offer stakeholders the opportunity for first-hand views of sites, actions, and technologies. Specific audiences may be targeted for tours, which will be conducted as requested or as the need arises. Stakeholder groups benefiting from a site tour may include local government and elected officials, school groups, social organizations, and businesses.

4.4.11: Editorial Boards/ Media Days

To foster more positive and open relationships with news media, installations can conduct editorial board visits, during which installation officials and PAOs visit with the editors of local media outlets. These events can evolve into larger media days that combine the editorial boards with site tours. In addition to learning more about the site and getting an in-depth understanding of the program, this will provide an opportunity for the media to take stock photos and video footage of the site for later use.

4.4.12: Speakers' Bureaus

Speakers' bureau programs consist of a series of briefings by key Army staff to the public in smaller group settings. They should be focused on presenting key messages to community groups that represent various stakeholders' attitudes and demographics. Speakers' bureaus should also provide community members with an opportunity to ask questions. They serve as another medium, by which the Army

can distribute its messages, gather informal feedback, and foster relationships with community members through direct interaction with credible Army sources.

4.4.13: Web Sites

Installation Web sites should be used as another means to provide the public with up-to-date installation messages and to distribute information products. All Web sites must be compliant with security and accessibility requirements. They should also be easily navigable to ensure access to public-friendly products. Public documents such as studies requiring public comment, news releases, fact sheets, site updates, and presentations should be kept current on an installation's Web site. In addition, community concerns should be addressed by topic as they develop or are expressed. Web sites can also have special pages specifically targeted to the media, that includes all press releases, media advisories, approved photos and captions, etc. Web sites can be used to gather input from the public. However, Web sites cannot be your only method of receiving public comment, as many people do not have access to computers.

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4.4.14: Community Groups/Restoration Advisory Boards

Current Army policy strongly encourages installations with environmental cleanup programs to solicit community interest in forming a RAB, document the solicitation process, and form these citizen advisory groups where community interest is found. RAB membership includes representatives of the Department of Defense (DoD), the EPA, state and local government, and public representatives of the potentially affected community. RAB members can provide individual input to the Army's environmental restoration program at both operating and closing or realigning installations. If an installation does not have an active RAB, it should re-evaluate community interest every two years.

RABs must be established at installations where property is being transferred to the public and where there is sufficient, sustained community interest in the environmental restoration program. Additional information on RABs is outlined in Appendix X.

4.4.15: TAPP Contractors

The Defense Department supports a program that enables RABs to acquire outside technical assistance to help members understand all facets of an installation's environmental cleanup program. Through the use of government purchase orders, the Technical Assistance for Public Participation (TAPP) program provides community members of RABs access to independent technical support. This technical support provides independent assistance with interpreting scientific and engineering issues such as the nature of environmental contamination and cleanup activities at an installation. RABs must apply for TAPP assistance.

Army installations initiate and manage TAPP contracts. Current policy limits TAPP expenditures to an annual maximum of $25,000, or one percent of the cost to complete environmental cleanup activities at a site, whichever is less. There is an

overall maximum of $100,000 for TAPP assistance for the entire "lifetime" of a cleanup project. These limits may be waived for certain extenuating circumstances.

4.4.16: Award Programs

Installations may promote its success stories by nominating its achievements for environmental awards such as the Secretary of the Army's Environmental Awards, the White House's Closing of the Circle Award and state sponsored awards.

4.4.17: Question and Answer Documents

Especially when preparing to respond to emerging issues or any subject that could generate public concern, it is useful to create a list of questions that could be posed to Army officials regarding specific environmental issues. Once a list of questions is completed, you can draft official answers to these questions that spokespeople can use as talking points when responding to questions from the stakeholders or media. These questions should provide easy-to-understand, non-technical answers. They should also cover the most difficult questions that could be asked, provide coordinated answers to these questions, and weave in your program's key messages.

4.5: Develop Implementation Schedule

With all the major components in place, begin developing an implementation schedule that will guide the targeted distribution of your key messages to specific stakeholder groups in a deliberate fashion. Review your prioritized list of stakeholders and map out the following for each group:

- The tools, tactics and key messages you will use to meet the information needs and preferred methods of communication
- Opportunities to implement feedback mechanisms with your tools and tactics that allow you to track and assess your progress towards your overall communications goals (examples would be comment cards in newsletters or at public meetings, direct mail surveys, etc.)
- A schedule for development and deployment of these tools and tactics based on program milestones and urgency of any emerging issues

4.6: Conduct Evaluation Activities

It is critical that you take advantage of opportunities to collect feedback from your stakeholders. Whether it be through casual conversations with stakeholders at community events or more formal data collection methods, this information will help you to continuously monitor the effectiveness of your communication with stakeholders and identify new opportunities for public interaction. You can develop sophisticated surveys about a particular issue or public concern or get basic information such as:

- Was the information provided clear and easy-to-understand?
- Do you still have questions regarding this environmental issue? If so, what are they?
- How often would you like updates regarding the installation's environmental program?

- Are you interested in being added to our mailing list?
- Are you part of a community group that would be interested in a presentation regarding the environmental program?

Take this data and use it to amend your community involvement approach, both in terms of how you develop and use specific tools and tactics and your larger public involvement plan. Follow up with stakeholders who participated in your initial assessment process to determine how effectively you were able to respond to their needs, as well as additional ways to improve Army communications.

5.0: Risk Communications

For this guidebook, risk is defined as environmental harm or adverse health effects that could result from human activities or exposure to the environmental conditions at a site. Risk communication is at the heart of effective public involvement. Virtually any decision affecting air, land, and water requires a discussion of risk to public health or the environment. Whenever a risk-related incident occurs, the Army must effectively communicate that risk and the plans for responding to the emergency. Working with the community requires more than a cursory understanding of this specialized task. The stakes are high whether you are speaking at a local public meeting or being interviewed by national news media.

Risk communication differs from the daily personal communication we have with our peers, family, and friends. Personal communication occurs most often in situations that can be described as "high-trust/low-concern." There is an established relationship with the other party that gives us credibility, and we usually know the background and ability to understand our audience. These established relationships and levels of comfort and understanding don't usually exist between the Army and the community groups with which it must communicate about risk.

If a community perceives itself as powerless against an institution as large and powerful as the Army, it will often distrust Army sources of information because of a perceived historical pattern of "decide, announce, and defend." Environmental justice issues may also impact how a community regards the Army. A community's mistrust may be compounded by its concern about the consequences of the Army's decisions for the community. Community concerns frequently lead to anger, hostility, and what communication experts call "outrage factors." These include feelings of:

- lack of control over the risk
- involuntary acceptance of risk
- unfamiliarity with the risk

Outrage factors affect how people perceive risks. For example, people living near an installation may believe a risk - such as unexploded ordnance buried underground three miles from their neighborhood - is unacceptable because:

- The Army, which they perceive as a large uncaring institution that has lied to the American public in the past, put it there. The Army also controls the hazard; thus, the source of both the problem and the solution lacks credibility.
- They feel they have little control over a problem that has the potential to harm them, their families, and their property values.
- The risk is "hidden" from them. The buried ordnance is worse than a visible risk because they cannot see it.

Regardless of how unlikely it is that an environmental condition will actually affect their health and safety, they may become angry and outraged at the risk and the perceived

source of the problem. Statistics really don't matter to them. In fact, in "low-trust/high-concern" communication, numerical assessment of risk is the least persuasive and least important element in the communication.

What is important? Here are three key findings from community-based research and practice in risk communication:

1. Perception equals reality. First, recognize that the Army's perception and your own understanding of the facts related to the installation's environmental problems may not resemble the public's perceptions. The first step in building a public involvement program should be learning how members of your community think, talk about, and perceive risks associated with the installation's missions and functions.

When you understand the community's perceptions, you can begin to address its concerns. Provide members of the community an opportunity to voice their concerns and then work toward strategies that give people a sense of having more control over their community. Help them to become more familiar with the hazard and its associated risks, but don't try to "win them over" with facts, facts, and more facts. For example, RABs allow people to participate in the decision-making process and can reduce their perceived lack of control and feelings of powerlessness.

2. Trust and credibility are essential. Credibility is hard to earn and easily lost. When people feel an installation's environmental problems may jeopardize their health, safety, and property values, they will hold Army representatives personally responsible. To gain credibility, you must consistently provide excellent environmental performance, personal accountability for "fixing the problem," and a willingness to put in the time required to build relationships with members of the community. Supporting a decision-making process that is open, visible, and gives some ownership to the community will foster an atmosphere of trust.

Trust is the bedrock of effective risk communication. The credibility of an information source like the Army plays a major role in how risk is perceived. National surveys show that nurses, physicians, and other health professionals are among the most trusted sources of information on health-related environmental questions. Fire chiefs and emergency response officials are considered highly credible sources on safety issues. Government and industry officials ranked lowest in trust and credibility as sources of environmental safety and health information, even though they are also considered to be the most knowledgeable on these subjects.

As a result, the Army will be unable to communicate risk information successfully to the community unless it earns its trust. Indeed, an environmental activist recently noted in a public meeting that he would never trust the military, but he could develop "some level of confidence in the people running the place, [if they] proved themselves to be competent and caring."

The primary way to build trust is to proactively and consistently communicate with stakeholder groups in layman's terms, i.e., providing factual information in a manner that is easy to understand on a regular basis. However, it is also helpful to foster relationships

with credible third parties, who can vouch for your good intent and support your key messages. These third party advocates should be well-respected in the community and serve as independent, non-partisan, people or organizations.

3. Communication skills must be learned and practiced. Risk communication research indicates that in "low-trust/high-concern" situations, people evaluate a communicator's credibility in 30-60 seconds based on their observations and prior knowledge of four characteristics. These characteristics, identified in marketing research, are:

- empathy and caring
- competence and expertise
- commitment and dedication
- honesty and openness

Empathy and caring account for about half of a source's credibility in a "low-trust/high-concern" situation. Competence, commitment, and honesty represent equal shares of the other half. This instant evaluation drives home the importance of good communication skills in presenting messages. In a dialogue with the community, whether at a public meeting or a RAB meeting, Army communicators really have less than a minute to convince listeners that they care about them and their concerns. If they spend that critical first minute dismissing fears, spouting statistics or using defensive, negative language, they lose an opportunity to build credibility.

The good news: even if people believe the Army lacks credibility, they can develop trust and confidence in individuals who work for the Army, provided those individuals demonstrate empathy for the community's concerns and commitment to an open working relationship. In addition to the resources referenced in this handbook, the Army offers risk communication training courses to assist personnel who communicate with the public about environmental issues.

For more information about risk communication course schedules, call the U.S. Army Center for Health Promotion and Preventive Medicine at DSN 584-2953 or commercial (410) 436-2953.

5.1: Public Health and Safety Communications

Many of the suggestions found in the various regulatory guidelines for public involvement are intended to encourage facility personnel to go beyond their legal requirements and responsibilities. Although they are generally helpful in maintaining good relations with local citizens, the constrained resources and staff shortages at many Army installations may place practical limits on the level of effort that can be committed to involving the public in ***all*** environmental decisions.

Concern is likely to be higher, however, for issues that potentially impact public health and safety, such as cleanup decisions under the Army's Installation Restoration Program, or an installation's use, storage or transport of toxic or hazardous materials. It is critical that Army installations commit the resources necessary to involve the public in decisions that

may have health implications; be prepared to provide regulatory agencies with information that enables the public to be aware of potential hazards to their health and safety; and be prepared to minimize hazards to the public and facilitate emergency response if accidents occur. Failure to meet these requirements may result in regulatory fines or penalties, and public controversy over health and safety issues has hampered installation operations in some cases.

This section addresses public involvement in response to issues based on health and safety concerns, such as the **Emergency Planning and Community Right-to-Know Act** (EPCRA) and the **Toxic Release Inventory** reporting program required under EPCRA and presidential Executive Order 12856.

5.1.1: Emergency Planning and the Community's Right to Know

The Emergency Planning and Community Right-to-Know Act (EPCRA) resulted from a cloud of methyl isocyanate gas that escaped on December 4, 1984, from a Union Carbide chemical plant in Bhopal, India, killing or permanently injuring several thousand people.

EPCRA requires that detailed information about the nature of hazardous substances in or near communities be made available to the public.

Military installations and other federal facilities are responsible for:

- immediately reporting releases of hazardous substances that exceed reportable quantities
- gathering information on the hazardous chemicals they use and store and providing this information to state and local commissions
- completing the Toxic Release Inventory annually

5.1.2: Executive Order 12856 and the Toxic Release Inventory

In August 1993, then President Clinton issued Executive Order 12856, *Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements*. This order requires federal facilities to comply with EPCRA and the Pollution Prevention Act of 1990. EPCRA's Toxic Release Inventory requires certain facilities with toxic releases above specified amounts to report toxic chemical releases and off-site transfers to the EPA and state governments.

The EPA compiles this data into a database known as the Toxic Release Inventory (TRI), which is released to the public. Executive Order 12856 requires federal facilities, like private industry, to submit annual TRI reports to the EPA.

The EPA's TRI program provides the public with information on the release of toxic chemicals in their communities. Facilities must report on both routine and accidental releases of toxic chemicals, the maximum amount of the listed chemical on-site during the calendar year, and the amount of chemical contained in wastes transferred off-site. The EPA posts information obtained from facilities' TRI reports on the Internet and makes it available in other formats. The intent is full disclosure,

and installations that show significant releases or transfers of toxic chemicals are likely to be the subject of public concerns and media interest.

At the installation level, there are several important aspects of public information and involvement to keep in mind when dealing with public interest in this issue:

- Under the law and by executive order, the public has a right to information about toxic releases. The EPA will make this information public, but follow-on questions from local communities or news media should be anticipated.

- Information released must be closely coordinated within the installation's environmental team to assure the accuracy and consistency of information. In keeping with the principles of environmental risk communication, as outlined previous in this chapter of this guide, information must be presented in a way that is accurate and easily understood by the lay person, and that prevents misunderstanding and undue alarm. The installation environmental team should work together to ensure that information, while explained in understandable terms and not technical jargon, is accurate.

5.2: Environmental Justice Issues

As federal entities, military organizations must promote the fair treatment of people of all races, income levels, and cultures with respect to activities, programs and policies with the potential to adversely impact the environment or human health. One way to promote the fair treatment of all groups and economic classes of Americans is to ensure they are fully and effectively included in the environmental decision-making process.

To develop and implement a public involvement strategy that is inclusive of everyone within local communities, Army installations should review the available demographic information about the population immediately surrounding the installation. It is necessary to consider this information when addressing public health and safety issues, planning actions with the potential to affect the environment and in all aspects of Public Involvement.

What does this mean for public participation at the installation level? In essence, Army installations must strive to achieve the following goals as an integral part of their environmental program:

- improving opportunities for minority and low-income communities to have access to, and share, information on Army policies and practices that affect their health and the environment.
- enhancing existing methods of encouraging participation by minority and low-income citizens in Army activities that affect their health and the environment, or, where possible, devising better methods of encouraging participation.
- providing translation of crucial public documents and interpreting hearings or public meetings where practicable and appropriate.
- improving existing community involvement and communication systems to ensure inclusiveness.

There are several ways to achieve the above goals, depending on the communities involved. At some installations, effective community involvement has been conducted through contacts with the local chapter of the National Association for the Advancement of Colored People (NAACP). Some minority, ethnic, or low-income communities have been reached most effectively through church or civic organizations. Environmental and public affairs staff may have to do some research and determine what works best for each community. Spanish and other appropriate foreign language mass media and social organizations have also been effective.

It is important to note that American Indians and Alaska Natives may make up a segment of communities, or may be communities in their own right, near installations. Native Americans who belong to state, but not federally recognized tribes, or tribes or bands not recognized by either the state or federal government, may be treated by any other individual or group. Some of these will be covered in your communications to minority, and other demographic groups, but sometimes it may be prudent to attempt to contact recognized tribes or bands or associations. It is critical that in planning for public involvement with tribal governments, installations consider and communicate with all impacted tribes, any umbrella organizations or forums on a regional level with other local tribes, or any national affiliations such as the National Congress of American Indians, Association on American Indian Affairs, and the American Indian Anti-Defamation Council. Established protocols dictate how federal agencies or departments are to seek participation from representatives of federally recognized tribes and Alaska natives. Department of the Army Pamphlet 200-4, *Cultural Resources Management*, outlines this process. Information is also available via the Army Environmental Center information hotline at 1-800 USA-3845.