

4

EPA's Community Involvement Plan

4.1 Community Involvement Goals

EPA is committed to involving the public in the cleanup of the Hudson River in a substantial and significant manner and established the following goals for the overall community involvement program. EPA will:

- Provide the public with **accurate, timely, and understandable information** and/or access to the information needed to understand the project as it moves forward;
- Provide the public with the opportunity to give **informed and meaningful input**;
- Ensure **adequate time and opportunity** for the public to provide input;
- **Give full consideration** to community input; and
- Assist the public in **understanding the project decision-making process** during project design and cleanup and the community's role in that process.

Community involvement goals and needs must be considered and balanced with the project's technical and scientific requirements. To date, EPA has focused its community involvement efforts on getting public input on the issues that are most important to community members and organizations.

4.2 Community Involvement Tools and Activities

In the 2003 CIP, EPA identified and developed a wide variety of community involvement tools and activities that would be used to implement this program. The objectives of these tools and activities generally fall into one or more of four categories:

4. EPA's Community Involvement Plan

- **Input** - How EPA receives information from the public.
- **Output** - How EPA shares information with the public.
- **Outreach** - How EPA promotes education and awareness about the project.
- **Involvement** - How EPA encourages public participation in the project.

Some tools and activities cross many categories. These include the Hudson River Field Office (HRFO), Public Availability Sessions, Public Forums, and Public Meetings.

Since the original CIP was released in 2003, many of the tools and activities outlined below have been implemented, and some have been changed or improved to better reflect community needs. EPA continues its commitment to an effective and participatory community involvement effort throughout the cleanup process.

Hudson River Field Office (HRFO)

Hudson River Field Office
421 Lower Main St.
Hudson Falls, NY 12839

Phone: (518) 747-4389
Toll free: (866) 615-6490
HRFO@roadrunner.com

Description: The cleanup of the Hudson River falls under the jurisdiction of EPA's Region 2 office, located in New York City. However, recognizing the strong upriver interest in the project, EPA established a field office in the heart of the upriver community to carry out many of the elements of the CIP. Staffed by a Director and a Community Involvement Coordinator and maintained by Ecology and Environment, Inc., the office serves as a central point to receive information on the project, ask questions of EPA officials, and meet to discuss current and future project activities. Visitors to the field office can review many project-related documents on a designated computer or in print. Because of the size of the site, a Community Involvement Coordinator assigned to the project is also located in EPA's New York City office.

Goal: The HRFO carries out many of the elements of the Community Involvement Plan.

Method: The HRFO is open to the public Monday through Friday from 8 a.m. to 4:30 p.m. and evenings by appointment. The office is closed on weekends and federal holidays. Specially scheduled meetings and open houses are held outside regular office hours from time to time.

 See Appendix A for Hudson River Field Office Information.

Public Availability Sessions



Description: Public availability sessions are effective, informal sessions open to the general public. They feature posters, displays, and interaction between EPA staff and the public. These sessions present detailed information in understandable terms, allow individuals to inquire about issues that most concern them, and afford each citizen a chance to speak freely to EPA personnel and contractors on a one-to-one basis. Public availability sessions do not require the use of court reporters and transcripts, although meeting summaries may be prepared.

Goal: The goal of these sessions is **to educate the public on important project issues and to enable community members to ask questions in a comfortable and informal setting.** Public availability sessions also **provide EPA with feedback from the community** and can uncover issues not fully understood by the community.

Method: Sessions are conducted as needed at convenient times and places. Whenever possible, public notice is given at least two weeks before scheduled public availability sessions.

Public Forums



Description: Public forums are semi-formal public sessions that are characterized by a presentation, a question-and-answer session, and/or a less formal poster/display session. This format allows members of the public to participate in both large and small group settings. Public forums do not require the use of court reporters and transcripts, although meeting summaries may be prepared.

Goal: Public forums are **opportunities to update the community on site developments and address community questions, concerns, ideas, and comments.**

Method: Sessions are conducted as needed at convenient times and places. Whenever possible, public notice is given at least two weeks before scheduled public forums.

Public Meetings

Description: Public meetings are structured, formal meetings open to the general public, featuring a presentation and interaction with the public. Formal public meetings may involve the use of a court reporter and the issuance of transcripts. **Formal public meetings are required only for a Proposed Plan and ROD amendments. A “public briefing” was required upon completion of the reme-**

4. EPA's Community Involvement Plan

dial design. For the Hudson River PCBs Superfund Site, EPA has gone far beyond the minimum requirements by holding public meetings on key project decisions or issues, such as the proposed locations of the sediment processing/transfer facility and engineering performance standards.

Goal: Public meetings are **opportunities to update the community on site developments and address community questions, concerns, ideas, and comments.**

Method: EPA schedules, prepares for, and attends all announced meetings. Whenever possible, public notice is given at least two weeks before scheduled public meetings.

 *See Appendix I for suggested meeting locations.*

EPA's Input Tools and Activities



Hudson River Field Office

Toll-Free:

1-866-615-6490

Local:

1-518-747-4389

HRFO Toll-Free Phone Number

Description: EPA has established toll-free service at the HRFO to improve access to project information.

Goal: The HRFO is located at the northern end of the 200-mile site, in the heart of the upriver community. However, interest in the project runs the length of the site. Extending toll-free access to community members along the entire site helps improve the flow of information between EPA and the community.

Method: EPA routinely publicizes the toll-free number through announcements, events, and publications.

Email

Description: Electronic mail can be used to contact EPA representatives for information or to ask questions about this site.

Goal: This provides **another method to help citizens provide input or request information.**

Method: Email the Hudson River Field Office at HRFO@roadrunner.com or EPA's Community Involvement Coordinators for the site at skopect.kristen@epa.gov or kluesner.dave@epa.gov.

 *For full EPA contact information see Appendix A.*

Mailing List Expansion

The Hudson River PCBs Superfund Site public mailing list is expressly intended for distributing project-related information. The mailing list is not public information and is not available for public viewing. While EPA may identify recipients to other agencies (e.g., NYSDEC) for project information distribution, EPA will not release this list to outside parties.

Description: EPA has an extensive mailing list of individuals and organizations. Utilizing several methods, EPA has solicited additional mailing addresses from community members interested in the Hudson River PCB dredging project.

Goal: Mailings effectively **communicate project and event information to a wide and diverse audience and provide information to community members who do not purchase newspapers, use computers, or have access to the Internet.**

Method: Methods for increasing the mailing list have included direct solicitation via visits to the field office, coordination with elected officials using constituent mailing lists, sign-up sheets at public meetings, availability sessions and festivals, and contact with community-based organizations to invite their members to sign up. Community members on the mailing list should notify the HRFO of any changes to their mailing address.

Public Comment Period

EPA is not required nor does it intend to prepare responsiveness summaries for each comment submitted during design. However, EPA will summarize how comments were used or considered in the decision-making process.

Description: This is a formal opportunity for community members to review and contribute comments on various EPA documents or actions. Comment periods are legally required for, among other things, Proposed Plans, Consent Decrees, and the addition or deletion of a site to the National Priorities List (NPL). For the Hudson River PCBs Superfund Site, EPA has gone well beyond these minimum requirements by holding comment periods on key design issues.

Goal: Comment periods **provide people with the opportunity for meaningful input in the process and provide EPA with valuable information for use in making decisions.**

Method: EPA announces comment periods with newspaper postings, listserv notifications, and EPA fact sheets to ensure the public understands what is being presented, when comments will be accepted, how long the comment period will be open, and how to submit comments.

See Appendix H for a list of regional newspapers.

EPA Regional Public Liaison

EPA Region 2 has designated a regional public liaison as a point-of-contact for community concerns and questions about the federal Superfund program in New York, New Jersey, Puerto Rico, and the U.S. Virgin Islands. To support this effort, the EPA has established a 24-hour, toll-free number that the public can call to request information, express their concerns, or register complaints about Superfund. The regional public liaison for EPA's Region 2 office is: George H. Zachos, U.S. EPA, Region 2, 2890 Woodbridge Avenue MS-211, Edison, New Jersey 08837, (732) 321-6621, Toll-free (888) 283-7626.

Public Input

Description: Letters and informal discussions with EPA staff are among the ways the public and EPA can communicate about the project. EPA wants to understand the public's concerns so they can be addressed.

Goal: Verbal comments and letters **allow continued opportunity for the public to give input and, consequently, allow EPA to recognize trends in issues of public concern and identify areas that require more information or clarification.**

Method: Informal comments can be offered at any time, such as during availability sessions, visits to the HRFO, open houses, community visits, and workshops. Written comments may be submitted by mail or via email.

 *See Appendix A for EPA contact information.*

Stakeholder Group Interaction

Description: EPA will coordinate with and, upon request, attend meetings of stakeholder groups.

Goal: Such interaction helps **ensure that members of these organizations receive the information that they need and that EPA receives their input and understands their concerns.** Interaction with stakeholder groups also can extend EPA's outreach by sharing EPA notices of events, site updates, and other information with their members and constituents.

Method: EPA regularly coordinates with and, upon request, will attend meetings of stakeholder groups that have identified the Hudson River PCBs dredging project as a focus of their organization. To conserve limited time and resources, priority is given to groups focused specifically on the PCB dredging project (e.g., issue-specific advocacy groups or dredging task forces/committees) and is based on EPA availability.

 *See Appendix F for a listing of Hudson River Stakeholder Groups.*

Surveys

Description: EPA will consider conducting print or telephone surveys to solicit feedback and has conducted surveys of CAG members.

Goal: Surveys allow EPA to continue to identify and update community concerns and issues along the entire site.

Method: Random surveys may be used as necessary, particularly in communities that have questions and concerns about the project but that have not necessarily had much access to other community involvement activities.

EPA's Hudson River Web Site:

www.epa.gov/hudson

EPA's Dredging Data Web Site:

www.hudsondredgingdata.com

EPA's Output Tools and Activities

EPA's Web Sites

Description: Internet access to major technical reports and updates on the Hudson River PCBs Superfund Site is available on EPA's Hudson River web site: www.epa.gov/hudson. Many other sources of information are available through the EPA homepage at www.epa.gov and through links to the web site. EPA has also established a web site to host information about the performance standard monitoring data that is being generated during dredging, which is available at www.hudsondredgingdata.com.

Goal: EPA's web sites provide key resources for accessing both general and site-specific information about the site and Superfund. Access to EPA's web sites is available through home and public computers at the HRFO and libraries throughout the site area.

Method: EPA posts updates and major technical reports, generally within two business days of their release. Notice of all public meetings, forums, and availability sessions and announcements related to the project are posted. The web site will continue to be updated and enhanced regularly so that users can easily search for information. EPA will provide links to important project-related information posted on other sites. EPA's dredging data web site is updated daily. Monitoring data is reported as it is received.



Fact Sheets



Description: Fact sheets, sometimes called site or project updates, are brief documents written in plain language, often containing user-friendly graphics, to help residents understand highly technical reports, concepts, and information.

Goal: Fact sheets provide site-related information in an easy to understand format.

Method: Fact sheets have and will continue to be produced throughout the project design and cleanup process to promote understanding of the individual elements of the remedy. Fact sheets are posted on the EPA web site, and are available at the HRFO and at public forums and may be distributed to individuals and organizations on the mailing list.

Infield Notification

Description: This type of information consists of advisories, restrictions, and explanatory signs posted to clearly mark project work areas and river-access restrictions.

Goal: Advisories, restrictions, and explanatory signs are intended to keep the public informed and maintain safety.

Method: All advisories, explanatory signs, and restrictions on river access or to project work areas will be clearly posted, including on locks and river buoys.

Information Repositories

Description: Information repositories are local public buildings such as libraries, universities, or government offices where site-related and supporting documents are available for review. There are a total of seven information repositories for the Hudson River PCBs Superfund Site located in Glens Falls, Ballston Spa, Fort Edward, Albany, Poughkeepsie, New York City, and Edgewater, New Jersey. All repositories have printed copies of major documents. Information repositories, as well as most public libraries throughout the site, have public-use computers that provide access to additional information. Three repositories also house the full Administrative Record.

Administrative Record
The body of documents that “forms the basis” for the selection of a particular response at a site. For example, the Administrative Record for remedy selection includes all documents that were “considered or relied upon” to select the remedy through the Record of Decision. An AR must be available at or near every site to permit interested individuals to review the documents and to allow meaningful public participation in the remedy selection process.

Goal: Information repositories **provide accessible public locations where residents can read and copy official documents** and other pertinent information about the site, EPA activities, and the Superfund process.

Method: EPA maintains seven information repositories from Glens Falls to New York City and will continue to add documents as they become available.

How EPA shares information with the public



- Community Advisory Group
- EPA's Web Site
- Fact Sheets
- Hudson River Field Office (HRFO)
- Infield Notification
- Information Repositories
- Listserv
- Maps / Visual Aids, Displays, and Events Outreach Materials
- Media Distribution / Media Events
- Newsletters
- Public Availability Sessions
- Public Forums
- Public Meetings
- Project Road Map
- Public Notices
- Public Service Announcements
- Reports / Document Summaries / Work Plans

See Appendix J for a descriptive listing of all information repositories.

Listserv

Description: The EPA-Hudson listserv is a free, subscription-based electronic news distribution system used by EPA to distribute updates, notifications, and progress reports via email and is the fastest way to get the latest information. The listserv cannot be used to transmit graphics and photos. All information conveyed via the listserv is text-only. EPA will make graphics-rich documents available on the Agency's Hudson River web site in .pdf format.

Goal: The goal of using listserv is **to disseminate information as quickly and effectively as possible to large numbers of interested parties.**

Method: Information about how to subscribe to the listserv is available at www.epa.gov/udson/listserv.htm.

See Appendix J for listserv information.

Maps and Visual Aids

Description: Maps and visual aids help people understand the geography of the site and the locations of activities and resources.

Goal: The objective of using visual aids is **to communicate complex issues effectively.**

Method: EPA regularly uses maps, photographs, and other visual aids in documents and fact sheets, at public sessions, at the HRFO, and on the web site.

Media Distribution/Media Events



EPA Deputy Regional Administrator, George Pavlou, presenting a statement during the dredging commencement ceremony on May 15, 2009.

Description: EPA provides updates and information to key local newspapers and radio and television stations and encourages them to further distribute this information on a regular basis. EPA representatives provide information and are accessible to the news media.

Goal: News releases and other types of information distribution to the media help EPA **to reach a large audience quickly and to reinforce and distribute information further. Media stories help explain technical information and track sequences of events** for the public.

Method: Common methods of providing information to the media include the distribution of press releases on developing issues related to the project, individual interviews with project staff, or statements made by EPA representatives during public and CAG meetings. Media briefings before public sessions may be used by EPA to summarize the purpose and main points of the event and to enhance accuracy of media coverage.

See Appendix H for a list of media contacts.

Project Roadmap

Description: EPA has mapped the project schedule to illustrate the general sequence of events during the design period leading up to, and including, dredging. The Roadmap describes the interrelationship of major project elements, discusses technical reports and documents and identifies the opportunities for public input.

Goal: Project roadmaps **help the public see the big picture.**

Method: A timeline that uses graphics to identify elements and their relationships is displayed at the HRFO and is available in fact sheet form. The project roadmap may also be presented at meetings and events.

See Table 3-1 for the Roadmap of Key Events and Public Involvement Opportunities.

Public Notices

Description: Public notices can be advertisements published in local newspapers or mailings that announce public comment periods for EPA decisions, public meetings, and major project milestones.

4. EPA's Community Involvement Plan

Goal: The goal of public notices is to communicate an important announcement to as many people as possible in the community.

Method: EPA uses public notices to announce public comment periods and public meetings. In certain cases, EPA will supplement published notices with radio announcements.

See Appendix H for a list of regional newspapers and other media outlets.

Reports/Concept Documents/Work Plans

Examples of Reports, Concept Documents, and Workplans:

Reports

Phase 1 Final Design Report, March 2006

Concept Document
Facility Siting Concept Document, December 2002

Work Plans

Remedial Design Work Plan, August 2003

Description: These reports detail the investigations, studies, findings, and decisions about the site and have been made available at the repositories and, in most cases, on EPA's Hudson River web site for public access.

Goal: To allow the public access to detailed information on the process and decision-making.

Method: EPA will continue to make these documents public. However, the complexities of these reports can make them difficult to understand for those without technical or scientific expertise. EPA recognizes that these reports need to be supported with other community involvement activities to give the public a clear understanding of the material presented in these documents. Fact sheets and various types of public meetings have been prepared and conducted to ensure that the public is educated about project activities and afforded an opportunity to provide input. All reports are available at the Hudson River Field Office and site repositories.

EPA's Outreach Tools and Activities

Community Events

Description: EPA attends community events, such as fairs and festivals, to distribute information and provide answers to questions.

Goal: Community events provide EPA with the opportunity to build and maintain good relationships with residents. Community events also allow EPA to understand and appreciate the daily lives of community members and the events and activities that are important and enjoyed by them.

Method: EPA will supply and staff an information booth at appropriate events.



Environmental Justice Activities

EJ
Environmental Justice

How EPA receives information from the public



- Community Advisory Group
- Email
- Hudson River Field Office (HRFO)
- Mailing List Expansion
- Public Availability Sessions
- Public Comment Period
- Public Input
- Public Forums
- Public Meetings
- Stakeholder Group Meetings
- Surveys

Description: Environmental Justice (EJ) activities encourage participation from communities that may not have direct access to project information due to language and cultural barriers. This is especially important because members of low-income and non-English speaking communities along the site continue to catch and consume fish from the Hudson River.

Goal: The primary goal is to **increase awareness and information about the project, especially in communities that may not know how to access information or that may not have many opportunities or methods to do so.**

Method: EPA will seek assistance from agencies who work with immigrant, low-income, and non-English speaking communities to distribute materials that describe the project and explain the New York State Department of Health fish consumption advisories.

In addition, a representative from the EJ community (Arbor Hill Environmental Justice Corporation) holds a seat on the CAG. The seat to address the subsistence fishing interest was added based on public comments received on the CIP. EPA will continue to coordinate with the CAG, environmental interest groups, and New York State to evaluate outreach needs, activities, and resources to develop and implement additional EJ activities.

See Appendix A for EPA Environmental Justice information and contacts.

Project Site Visits/Tours

Description: Small groups are given guided tours to view site activities when such tours are feasible, appropriate, and safe.

Goal: Site visits give the public a **better understanding of the project work.**

Method: EPA staff will lead tours of the sites and explain what is occurring. Field demonstrations are based on interest and safety considerations.

Public Television/Public Access Television Shows

Description: EPA will consider using community-oriented public access and public television shows to disseminate project information.

Goal: The goal of using television shows is similar to the use of other media: **to increase awareness and understanding of the project and project issues.**

Method: EPA may contact show producers about featuring the Hudson River cleanup project.

How EPA promotes education and awareness about the project



- Community Advisory Group
- Community Events
- Community Poster
- Hudson River Field Office (HRFO)
- Public Availability Sessions
- Public Forums
- Public Meetings
- Project Site Visits / Tours
- School / Education Outreach Activities
- Toll-free Hotline
- Video Productions
- Workshops / Seminars

School/Education Outreach Activities

Description: EPA will provide project information to interested schools and will assist them in developing educational projects related to the Hudson River PCBs Superfund Site.

Goal: Educational activities help **expand awareness and understanding of the project and strengthen ties to the community.**

Method: Educators and students can visit or call the HRFO for information, arrange a field trip to the HRFO for a presentation, request a visit to their school from an EPA representative, or visit any of these pages on the EPA Web site: www.epa.gov/hudson, www.epa.gov/kids, www.epa.gov/students, or www.epa.gov/teachers.

Video Productions

EPA will consider producing videotape recordings representative of some project activities, such as sediment sampling and testing, dredging operations, and sediment processing and transfer activities.

Goal: These videos will allow members of the community **to view examples of project activities.** Videos also can be used as **a tool to explain how activities are occurring.**

Method: EPA will research and determine the most effective means for producing project-related videotapes.

4. EPA's Community Involvement Plan

Workshops/Seminars

Description: Workshops and seminars are classroom-style sessions used to provide more detailed technical information for interested citizens. Workshops can be used to explore project-specific topics, such as how dredging operations occur, or more general scientific topics, such as how statistics are used in the project.

Goal: Workshops can be used to **educate small groups of citizens on the chosen topics** and address issues identified in the CIP.

Method: If there is sufficient interest, EPA will conduct targeted workshops to educate the public on the basics of dredging operations and related project topics.

Involvement Tools and Activities

Coordination with Local Government and Agencies

Description: EPA coordinates with local governments and agencies to keep them informed and to get feedback on their concerns. EPA will continue to communicate with these representatives and agencies through all phases of the project.

Goal: EPA's goal is to ensure that **local government officials and agencies are informed of project activities** that may occur in their jurisdiction and to help minimize the impacts of project activities.

Method: EPA will continue to foster relationships with local representatives and agencies through meetings and dialogue.

Technical Assistance Grant (TAG)

TAG
Technical Assistance
Grant

Description: Technical Assistance Grants (TAGs) are grants of up to \$50,000 issued by EPA to a qualified group of people who live near and are affected by an NPL site. The TAG can be used to hire a technical advisor, an expert who can explain technical information and help articulate the community's concerns about it. An additional \$50,000 may be made available to the TAG recipient, if requested, at complex sites.

Goal: Grants **enable a representative group of the community to understand technical aspects** of cleanup projects.

4. EPA's Community Involvement Plan

Method: Only one TAG is awarded per NPL site. The availability of the TAG for the Hudson River PCBs Superfund Site was announced in 1990 and was issued to the environmental group Scenic Hudson, Inc. on September 29, 1995. Scenic Hudson, Inc. applied for and was granted an extension of its TAG funding period through 2008. TAG has been officially closed out since 2008.

Technical Assistance Services for Communities Contract (TASC)

CERCLA
Comprehensive
Environmental Response,
Compensation, and
Liability Act

TASC
Technical Assistance
Services for Communities
Contract

RCRA
Resource Conservation
and Recovery Act

CAG
Community Advisory
Group

Description: TASC is a program which provides independent, non-advocacy educational and technical assistance to communities affected by hazardous waste sites regulated by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the Resource Conservation and Recovery Act (RCRA). The purpose of the TASC is to help communities have a better understanding of the hazardous waste issues so they can participate in the hazardous waste cleanup process more effectively. TASC replaces the Technical Outreach Services for Communities (TOSC) program.

For more information visit:

<http://www.epa.gov/superfund/community/tasc/index.htm>.

Goal: TASC provides eligible communities with **an independent understanding of technical, scientific, and hazardous substance contamination issues** so they can participate effectively in the decision-making process.

Method: EPA has acquired TASC support, which is available to site communities. In spring 2008, EPA Region 2 contacted TASC with a formal request for assistance to ensure that members of the Community Advisory Group (CAG) were well-informed regarding the findings of a recently released technical report, which described Phase 2 of GE's dredging plan (Phase 2 Dredge Area Delineation Report). TASC selected a Technical Assistance Specialist with a background in sediment geochemistry who prepared a PowerPoint presentation outlining the report's major sections and information highlights. The Technical Assistance Specialist presented to the CAG during their June 4, 2008 meeting and answered the group's questions to ensure that the technical elements of the report were well understood.

General Electric's Output Tools and Activities

GE's Community Involvement Activities

The following activities have or will be undertaken by GE and its contractors in addition to the outreach activities conducted by EPA outlined above.

Community Education and Notification Program

Elected officials, local residents, and the public participated in the development of a Community Education and Notification Program (CENP) that is designed to:

1. Provide timely and understandable project information to the public.
2. Make project information easily accessible to the public.
3. Quickly disseminate information about project emergencies to the public so they can avoid needless interaction with emergency responders.

Components of the CENP include:

- Progress reports;
- GE project web site: www.hudsonredging.com;
- Toll-free hotline: (888) 596-3655;
- Listserv/mailling list;
- Email communication;
- Public meetings;
- Notice to mariners;
- Notice to shoreline owners; and
- Designated community liaison.

GE Project Web Site:

www.hudsonredging.com

GE Toll-Free Hotline:

(888) 596-3655

Complaint Management Program

Additionally, a Complaint Management Program (CMP) was developed to manage all project-related complaints, including those associated with air quality, odor, noise, lighting, navigation, and water quality. The goals of the CMP are to enable the public to register project-related complaints during work activities and provide complainants with timely and accurate notification of efforts to address the subject of their complaints.

More information about the CENP and CMP is available in the [Phase 1 Remedial Action Community Health and Safety Plan](#).

Phase 1 Remedial Action CHASP Web Link:

www.epa.gov/region2/superfund/udson/pdf/chastp_ph1rev2.pdf

4.3 The Hudson River PCB Superfund Site Community Advisory Group (CAG)

The purpose of the CAG is to provide a way for members of communities and stakeholders along the entire Hudson River site to present and discuss their needs and concerns related to the site design and cleanup decision-making process. It offers EPA an opportunity to hear and consider community input on the design and impacts of the selected remedy.

While not a required community involvement activity, the presence of a CAG at a Superfund site can greatly enhance the community involvement process. Not only does it serve as a forum for the community and EPA, an active CAG can help improve communication between community members.

CAGs can promote greater public participation in cleanup projects and help citizens and EPA make better-informed decisions. At a few Superfund sites, CAGs have remained functional beyond the life of the project and now work to promote public involvement in a variety of environmental issues.



It is important to note that a CAG adds value to but does not replace the broad spectrum of community involvement activities outlined elsewhere in this CIP. Every member of the community has the opportunity to express an opinion about the project and its elements at any time and does not have to rely on the CAG to convey that message.

A CAG is intended to provide a forum through which a broad and diverse sample of community needs and interests are represented. A CAG does not serve as a decision-making body. It is not a voting entity and does not set policy or make decisions regarding project design and implementation.

The CAG for the Hudson River PCBs Superfund Site is designed to:

- Promote broad, balanced representation of communities and stakeholders along the entire site;
- Encourage more routine and consistent communications and coordination between EPA and the community;
- Solicit ongoing recommendations about ways to enhance community involvement;
- Provide an avenue for the community to voice its needs and concerns; and
- Provide for a consistent source of feedback for EPA to gauge interests and needs.

CAG meetings also allow members to provide comments on project-related issues, such as:

- Community health and safety plans;
- Quality of life issues (e.g., noise, odor, lights);
- Community impacts;
- Community resources and events;
- Environmental justice;
- Cultural resources;
- Habitat plans and reports;
- Project education; and
- Evaluation of community outreach and involvement.

4.3.1 General Framework

CAGs are autonomous entities that rely on EPA for organizational and informational support. EPA's role in the formation of the CAG is to initiate its development and offer organizational and financial support through the hiring of an independent, neutral facilitator.

The size of a CAG depends on the needs of the affected community. A CAG should include enough members to adequately reflect the diversity of community interests but should be small enough to function effectively. Typically, CAGs have approximately 15 to 20 members.

Nomination and Membership

The development of the Hudson River CAG began with the convening of an Interim Advisory Group (IAG) shortly after release of the proposed CIP in April 2003. This allowed for immediate interaction and flow of communication between EPA and the interests that would later be represented on the CAG.

Initially, EPA reached out to elected officials, agencies, and community leaders from a variety of areas and interests to serve as nominating organizations for CAG membership. CAG members were ultimately chosen because they represented an interest group that would likely be affected by the remedy and were drawn from among residents and owners of residential, agricultural, commercial, and industrial properties near the site; others who may be directly affected by site releases; minority and low-income groups; local environmental or community groups; local government units; local labor representatives; and local businesses. In this way,

IAG
Interim Advisory Group

4. EPA's Community Involvement Plan

viewpoints from communities along the entire site would be represented, allowing a broad range of interests to be heard and considered. The process of nominating citizens for CAG membership was not designed to encourage any particular outcome.

In addition, the following criteria for selection were used:



- Each member should have some knowledge of the goals, objectives, and impacts of the project;
- Each member should in some way be affected by or have a central interest in the decision to dredge the Upper Hudson River; and
- Each member should be willing to assume the responsibility for attending meetings and communicating information back to the community.

Before they agreed to participate, individual members were made aware of the following expectations:

- Willingness to accept that the CAG will not revisit the decision to dredge the river;
- Willingness to work in a collaborative environment and refrain from personal challenges to other members;
- Ability to attend general and sub-committee meetings of the CAG, other related events, and to read all preparatory materials (6 to 10 hours per month);
- Willingness to work with an independent facilitator in a collaborative process;
- Willingness to convey information from the CAG to their respective constituencies in a constructive and timely fashion.

CAG Members and Changes to the CAG

During the 30-day public comment period on the proposed CIP (April 28 to May 28, 2003), EPA received approximately 27 written comments. This input from the public resulted in a decision to increase the members of the CAG from 17 to 25.

Current CAG membership and interests as of January 1, 2009 are shown in Table 4-1.

Table 4-1 CAG Membership as of January 1, 2009

Interest	Organization	Number of Seats
Fishing	Hudson River Fishermen's Association	1
Subsistence Fishing	West Harlem Environmental Action, Inc.	1
Environmental Justice	Arbor Hill Environmental Justice Corporation	1
Agriculture	Vacant	1
Economic Development, Tourism, Recreation	Saratoga County Chamber of Commerce Washington County Department of Planning and Community Development	2
Labor	New York State Building and Construction Trades Council	1
Commercial Transportation	New York State Marine Highway Transportation Company LLC	1
Recreational Boating	Hudson River CARE	1
Community Group – Upper Hudson	Citizen Environmentalists Against Sludge Encapsulation (CEASE) Hudson River CARE	2
Environmental Group – Upper Hudson	Sierra Club Hudson - Mohawk Group	1
Environmental Group – Mid-Hudson	Hudson River Sloop Clearwater	1
Environmental Group – Lower Hudson	Riverkeeper	1
Environmental Group – At Large	Scenic Hudson	1
Project Area River Communities	Town of Fort Edward Town of Stillwater	2
County Government: Saratoga	Town of Moreau Town of Waterford Town of Halfmoon	3
County Government: Washington	Town of Greenwich Town of Fort Edward Town of Easton	3
County Government: Albany	Albany County Economic Development, Conservation and Planning	1
County Government: Rensselaer	Rensselaer County Public Health Department	1

4.3.2 Convening the CAG

EPA set a goal of having a CAG in place and functioning within four months following the release of the CIP in August 2003. In keeping with this goal, the Director of the Hudson River Field Office convened the first meeting of the CAG on January 6, 2004. Between January 2004 and January 2009, 38 CAG meetings were held at various locations in Fort Edward, Saratoga Springs and Albany, New York. CAG meetings are generally held on the fourth Thursday of the month. All meetings are open to the public.

Facilitator – The Consensus Building Institute (CBI)

At the outset, EPA assisted the CAG by hiring an independent neutral facilitator. There are a number of advantages to using a meeting facilitator:

- The independent facilitator prevents one interest or group from dominating the discussion;
- A facilitator enforces the meeting guidelines and structure more easily than a group member and keeps the meeting focused and on track;
- The facilitator serves as CAG recorder and prepares meeting reports and summaries and coordinates formal CAG comments with EPA;
- The facilitator is an expert in engaging people to generate options, build consensus, and create plans for implementation and follow-through; and
- The facilitator is a subcontractor who does not directly report to EPA.

In consultation with the CAG, the Consensus Building Institute (CBI) was selected to facilitate the CAG in 2003. In addition to facilitating CAG meetings, CBI e-mails meeting notices, minutes, and report summaries and provides additional informational and organizational support as needed.

Working with CBI, the CAG initially addressed the following issues:

Understanding Its Role

The goal of the CAG is to serve as a forum for conveying community preferences about the design and mitigation of the impacts of the selected remedy. Members of the CAG are offered the same opportunity to review and comment on EPA documents and plans as members of the general public, and any information available to the CAG is also made available to the general public. The CAG does not receive information in advance of the general public unless EPA determines that it is appropriate. More importantly, the CAG does not receive additional review time beyond that allowed to the public.

The CAG is encouraged to take on additional roles, such as helping EPA to expand its outreach and helping to promote educational activities in schools and within the community.

Leadership and Operating Procedures

In consultation with CBI, CAG Operating Procedures were developed in April 2004 and revised in August 2005 to include media ground rules. The CAG Operating Procedures describe:

- The purpose of the CAG;
- Working group membership;
- Responsibilities of the CAG membership;

CBI Consensus Building Institute

Contact:
Patrick Field &
Ona Ferguson
238 Main Street
Suite 400
Cambridge, MA 12142
Tel. (617) 492-1414

Washington, D.C. Office:
1201 New York Avenue NW
Suite 625
Washington, D.C. 20005
Tel. (202) 289-8780

<http://cbuilding.org>

4. EPA's Community Involvement Plan

- Responsibilities of the EPA and CAG liaisons;
- Communication among members and meeting attendees;
- Developing group input and providing input within the CAG's scope;
- Role of facilitators;
- Meeting summaries and meeting notification;
- Public attendance, public comment and the media;
- Agenda planning; and
- Chairs, annual reviews, and other issues.

Because the group is facilitated, the CAG did not designate a chair. Initially, group membership in the CAG was established for a period of one year, beginning in January 2004. After that time, the CAG could add new interest groups and/or organizations by consensus at any time if it identified interests or concerns that were not represented. Since 2004, three new interest groups have been added: commercial transportation, recreational boating, and project area river communities.

Once selected for membership, each CAG member group chose a representative to participate in the CAG. Some groups also designated an alternate who is responsible for staying informed about the CAG's work, attending meetings when the primary member cannot attend, and is available to join the group should the primary member not be able to fulfill his or her term. Once appointed, membership is individual and not assigned to specific organizations. While it is important that the overall membership of the CAG be representative of the diverse interests and viewpoints of community members concerned about the Hudson River project, individual members are free to participate in an open-minded and collaborative atmosphere. CAG members agree to serve on the CAG for at least one year. An agenda planning committee was established by the CAG that works with CBI and EPA to develop meeting agendas and coordinate overall group direction.

EPA is not a member of the CAG but attends CAG meetings on a regular basis. Several entities serve as liaisons to the CAG because of their role in the overall remediation effort. Liaisons include: NYSDEC, NYSDOH, NYSCC, and GE. EPA is the lead agency with the CAG and is the primary respondent to issues regarding the Hudson River PCB site, remedial design, and implementation. Liaisons are encouraged to actively participate but are not CAG members.

Since 2004, CAG meetings have included presentations by EPA, GE, NYSDEC, NYSCC, and NYSDOH on topics related to project design, dewatering facility siting, water quality protection, dredg-

4. EPA's Community Involvement Plan

ing logistics, floodplain sampling, archaeological studies, quality of life and engineering performance standards, and the Community Health and Safety Plan, among others. All meetings provide an opportunity for CAG members to ask questions and provide input.

Sharing Information

Members of the CAG are encouraged to exchange information and ideas regularly. It is important that CAG members are aware of the actions of other groups in the community. Over the past five years, the CAG has explored opportunities to share information and work together with other groups toward common objectives and to limit duplication of effort.

Members of the CAG, as appropriate, receive copies of EPA-issued project documents as soon as they are released to the public.

CAG Web Site

Access to all relevant CAG materials is available on the CAG Web site: www.hudsoncag.ene.com. The CAG Web site includes key contact information and group resources, including meetings agendas, minutes, meeting presentations, operating procedures and meeting ground rules. The date and location of upcoming meetings are posted on the site as they are scheduled.

CAG Web Site:
www.hudsoncag.ene.com

4.4 The Plan

The action plan (see Table 4-2) matches the community concerns identified in Section 3 with the community involvement tools and activities identified in Section 4.1. EPA recognizes the public's need for two-way communication about decisions made regarding the Hudson River PCBs Superfund Site and the public's opportunities to be involved in that process. EPA is currently addressing these issues and will continue to do so throughout the project.

4.5 Summary of Community Involvement Activities

See Table 4-2.

4.6 Updates to the Community Involvement Plan

As additions, changes, and improvements to the CIP are identified, EPA will continue to update it, notify the public of changes via the listserv and other communication tools, and post the revised version of the document on the web site.

Table 4-2 Community Involvement Issues and Tools

Community Involvement Issues	Community Involvement Tools
Concerns about the Process	
The community wants a clear explanation of its role and responsibilities in EPA's decision-making process.	<ul style="list-style-type: none"> ▪ Community Advisory Group ▪ Project Roadmap
The community wants a process that is transparent.	<ul style="list-style-type: none"> ▪ Community Advisory Group ▪ Fact Sheets ▪ Hudson River Field Office (HRFO) ▪ Newsletters ▪ Project Roadmap ▪ Public Availability Sessions ▪ Public Forums ▪ Reports/Concept Documents/Work Plans
The community wants a process that is meaningful.	<ul style="list-style-type: none"> ▪ Community Advisory Group ▪ Fact Sheets ▪ Hudson River Field Office (HRFO) ▪ Project Roadmap ▪ Public Availability Sessions ▪ Public Forums ▪ Public comment or input on some documents
Community involvement must be adequately supported, especially with key information.	<ul style="list-style-type: none"> ▪ EPA's Web Site ▪ Fact Sheets ▪ Hudson River Field Office (HRFO) ▪ Infield Notification ▪ Information Repositories ▪ Listserv ▪ Maps, Visual Aids, Displays, and Events Outreach Materials ▪ Media Distribution/Media Events ▪ Newsletters ▪ Project Roadmap ▪ Project Site Visits/Tours ▪ Public Availability Sessions ▪ Public Forums ▪ Public Meetings ▪ Public Notices ▪ Public Television/Public Access Television Shows ▪ Public Service Announcements ▪ Reports/Concept Documents/Work Plans ▪ School/Education Outreach Activities

4. EPA's Community Involvement Plan

Table 4-2 Community Involvement Issues and Tools

Community Involvement Issues	Community Involvement Tools
	<ul style="list-style-type: none"> ▪ Toll-free Hotline ▪ Video Productions ▪ Workshops/Seminars
The community involvement process must be responsive to the needs of stakeholders.	<ul style="list-style-type: none"> ▪ Community Advisory Group ▪ Progress Reports/ Newsletters
The community wants a process that is flexible.	<ul style="list-style-type: none"> ▪ There are almost 40 separate community involvement activities identified in the CIP. Together they serve as a toolkit for EPA's public participation program at the site and provide the public with myriad opportunities for involvement and participation in the project.
Community involvement must be broad-based and representative.	<ul style="list-style-type: none"> ▪ Community Advisory Group ▪ Community Events ▪ Community Poster ▪ Environmental Justice Activities ▪ Mailing List Expansion ▪ Public Availability Sessions ▪ Public Forums ▪ School/Education Outreach Activities
Concerns about the Remedy	
Effects on Human Health	<ul style="list-style-type: none"> ▪ Community Advisory Group ▪ Fact Sheets ▪ Information Repositories ▪ Public Availability Sessions ▪ Public Input ▪ Public Forums ▪ Technical Assistance Grant ▪ Technical Assistance Services for Communities
Effects on Quality of Life	<ul style="list-style-type: none"> ▪ Community Advisory Group ▪ Fact Sheets ▪ Information Repositories ▪ Public Availability Sessions ▪ Public Input ▪ Public Forums ▪ Technical Assistance Grant ▪ Technical Assistance Services for Communities
Economic Effects	<ul style="list-style-type: none"> ▪ Coordination with Local Government and Agencies ▪ Infield Notification ▪ Information Repositories ▪ Public Input ▪ Stakeholder Group Meetings
Effects on Agricultural Operations	<ul style="list-style-type: none"> ▪ Coordination with Local Government and Agencies ▪ Fact Sheets ▪ Information Repositories ▪ Public Input ▪ Stakeholder Group Meetings

4. EPA's Community Involvement Plan

Table 4-2 Community Involvement Issues and Tools

Community Involvement Issues	Community Involvement Tools
Effects on Fish and Wildlife	<ul style="list-style-type: none"> ▪ Coordination with Local Government and Agencies ▪ Fact Sheets ▪ Information Repositories ▪ Public Availability Sessions ▪ Public Input ▪ Public Forums ▪ Technical Assistance Grant ▪ Technical Assistance Services for Communities
Effects on Cultural and Archaeological Resources	<ul style="list-style-type: none"> ▪ Fact Sheets ▪ Information Repositories ▪ Public Availability Sessions ▪ Public Input ▪ Public Forums
Effects on River Navigation	<ul style="list-style-type: none"> ▪ Coordination with Local Government and Agencies ▪ Infield Notification ▪ Information Repositories ▪ Public Input ▪ Public Service Announcements
2002 Record of Decision Community Involvement Commitments	
Quality of Life Performance Standards	<ul style="list-style-type: none"> ▪ Community Advisory Group ▪ Coordination with Local Government and Agencies ▪ Fact Sheets ▪ Public Availability Sessions ▪ Public Input ▪ Public Forums ▪ Technical Assistance Grant ▪ Technical Assistance Services for Communities ▪ Workshops/Seminars
Engineering Performance Standards	<ul style="list-style-type: none"> ▪ Community Advisory Group ▪ Coordination with Local Government and Agencies ▪ Fact Sheets ▪ Public Availability Sessions ▪ Public Input ▪ Public Forums ▪ Public Meetings ▪ Technical Assistance Grant ▪ Technical Assistance Services for Communities ▪ Workshops/Seminars
Sediment Processing/Transfer Facility	<ul style="list-style-type: none"> ▪ Community Advisory Group ▪ Coordination with Local Government and Agencies ▪ Fact Sheets ▪ Public Availability Sessions ▪ Public Comment Period ▪ Public Input ▪ Public Forums

4. EPA's Community Involvement Plan

Table 4-2 Community Involvement Issues and Tools

Community Involvement Issues	Community Involvement Tools
	<ul style="list-style-type: none"> ▪ Public Meeting ▪ Reports/Concept Documents/Work Plans ▪ Technical Assistance Grant ▪ Workshops/Seminars
Habitat Replacement/Dredged Areas Backfilling	<ul style="list-style-type: none"> ▪ Community Advisory Group ▪ Coordination with Local Government and Agencies ▪ Fact Sheets ▪ Public Availability Sessions ▪ Public Input ▪ Public Forums
Community Health and Safety Plans	<ul style="list-style-type: none"> ▪ Community Advisory Group ▪ Coordination with Local Government and Agencies ▪ Fact Sheets ▪ Public Availability Sessions ▪ Technical Assistance Services for Communities ▪ Public Input ▪ Public Forums ▪ Technical Assistance Grant ▪ Workshops/Seminars
Cultural and Archaeological Resources	<ul style="list-style-type: none"> ▪ Community Advisory Group ▪ Coordination with Local Government and Agencies ▪ Fact Sheets ▪ Public Availability Sessions ▪ Public Input ▪ Public Forums ▪ Technical Assistance Grant ▪ Technical Assistance Services for Communities ▪ Workshops/Seminars

