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Lessons Learned in the Superfund Process: A Guide for Community Advisory Groups

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LESSONS LEARNED IN THE SUPERFUND PROCESS:

A GUIDE FOR COMMUNITY ADVISORY GROUPS



Terri Nichols

May 2018

LESSONS LEARNED IN THE SUPERFUND PROCESS: A GUIDE FOR COMMUNITY ADVISORY GROUPS

By

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Professional Paper

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For more information about this guidebook, or for a copy of interview guides used to interview Superfund advisory group leaders and EPA Community Involvement Coordinators, contact Terri Nichols at terrifnichols@gmail.com.

Lessons Learned in the Superfund Process: A Guide for Community Advisory Groups

Chairperson: Dan Spencer

ABSTRACT

Superfund Community Advisory Groups (CAGs) and Technical Advisory Groups (TAGs) can influence the clean-up of hazardous wastes in their communities by providing a forum for diverse community interests and concerns in the federal Superfund clean-up process. These volunteer groups may increase local input and engagement in remediation of hazardous wastes, as well as in the ultimate future of their community, through collaboration with community members, U.S. Environmental Protection Agency staff, and parties responsible for contamination. Yet most CAGs and TAGs struggle within the complex, multi-phase Superfund process. Forming a Superfund advisory group is a significant undertaking, requiring understanding of federal policies, scientific and technical information, and the many skills necessary for successful group functioning.

This professional paper aims to provide a missing resource for new Superfund advisory groups: a guidebook based on the real-life experiences of long-serving advisory groups and the EPA staff who work with them. Based on interviews with the leaders of 15 experienced advisory groups and 4 EPA Community Involvement Coordinators in the Intermountain West, as well as observations of one Montana CAG's first year of operations, this guide has one central goal: to help communities establish and sustain effective advisory groups that are capable of fostering a successful, community-informed Superfund clean-up. To achieve this goal, it addresses the following topics:

- Forming a Superfund advisory group.
- Developing a vision and goals for that group.
- Working toward this vision through productive group processes.
- Finding the most helpful resources along the way.
- Achieving goals.
- Winding down and expanding an advisory group's work out into the community.

Acknowledgements

I could not have written this guidebook without the help of many people both within and outside the world of Superfund advisory groups.

First I'd like to thank all the members of the Frenchtown Smurfit-Stone Community Advisory Group in Frenchtown, Montana. Their dedication to working on contamination issues to ensure the health of their community inspired me to create this guidebook.

I am also grateful to the EPA community involvement coordinators who answered my technical questions, shared with me their experiences and expertise, and provided feedback on this guidebook.

I am forever indebted to all the Superfund advisory group leaders who took the time to share their stories and the deep knowledge they've gained working on Superfund issues in their communities. These people embody the idea of engaged citizenship through sincere efforts to make their communities better places to live.

Even with all this help and information at my fingertips, this guidebook would never have existed without my amazing professional paper committee: Laurie Yung, whose understanding of community and natural resource conflicts laid the groundwork for my thinking about public participation in Superfund issues; Neva Hassanein, whose keen ability to sort through my ramblings about research data pointed me in the right direction when I was feeling overwhelmed; and my amazing adviser, Dan, who somehow, no matter how busy he was, always found the time to sit down with me and to listen and give feedback as if my concerns were the only thing that mattered in that moment.

Thank you also to all my friends and my brothers, who patiently listened to me ramble on and on about Superfund advisory groups for over a year. I am extremely grateful to everyone who read draft versions of this guidebook and gave me feedback to help improve it. H el ene Scalliet, Dabney Langellier, and Lisha Meyer gave great insights as non-Superfund-immersed "laypeople." Bonnie Rader and Judy Matson, two highly experienced advisory group leaders, also offered suggestions for improvement. UM Web Services Librarian Jaci Wilkinson gave excellent design tips and feedback.

I have been extremely lucky to have such a supportive community throughout this project. With much gratitude.

– Terri Nichols

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INTRODUCTION

This guidebook is for anyone wishing to form a *Community Advisory Group (CAG)* or *Technical Advisory Group (TAG)* in the federal *Superfund* process. Drawing on lessons learned by experienced advisory groups and U.S. *Environmental Protection Agency (EPA)* staff, it shares practical advice and effective approaches for addressing your community's needs related to *contamination* and *remediation*. The goal of this guide is to help you establish and sustain an effective advisory group – one capable of fostering a successful, community-informed Superfund clean-up.

CAGs are meant to give all affected and interested community members the opportunity to have an active voice in the Superfund clean-up process, by providing a public forum for presenting and discussing their needs and concerns with the EPA.^{1,2} TAGs have the same general function as CAGs, with the added responsibility of interpreting technical and scientific information for the community through the use of EPA *Technical Assistance Grants* that pay for independent technical advisers and other needs.³

To help with understanding how your advisory group can work most successfully, terms and acronyms used in Superfund are italicized on first reference and included in a [Glossary](#) at the end of the guide. Text boxes included throughout help to explain basic concepts (blue boxes) and effective strategies (green boxes). Direct quotes from advisory group leaders and EPA staff I interviewed for this project are in separate, yellow text boxes.

IS AN ADVISORY GROUP RIGHT FOR YOU?

Before you get started, you'll need to ask yourself a key question: Is an advisory group right for you and your community?

CAGs and TAGs may not be appropriate at every Superfund site. They typically work best at sites where the EPA is involved in a long-term clean-up, and community members have time to fully engage in the process. The nature of Superfund advisory groups

Understanding the Basics:

What is Superfund?

Superfund is the common name for the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980. It is a federal government program that authorizes the EPA to identify parties responsible for hazardous waste contamination and to require those parties to either clean up the contamination or reimburse the government for clean-up. When there is no viable *responsible party*, Superfund gives EPA the funds and the authority to clean up contaminated sites using taxpayer money.

Superfund clean-ups are complicated processes consisting of multiple phases. For more information about these phases, see the EPA's [Superfund Cleanup Process](#) web page.

Source: "[What is Superfund?](#)" *Environmental Protection Agency*.

"I think the first question the community always has to ask itself is: 'Is there sufficient interest and energy to take on a stakeholder-driven process?' ... The key is that the people in the community have to have a dedication to self-determination. They have to believe that there is nobody that is better able to identify the priorities and the wishes of that community than the people in the community."

– Leader of Community Advisory Group #1

encourages collaboration and cooperation among community members, EPA staff, and sometimes responsible parties. If your community does not wish to work with the EPA – if, instead, community members prefer to file a lawsuit against responsible parties or hold public protests – an advisory group may not be for you. An advisory group also may not be ideal if you don't have broad community support and a core group of community members who are able and willing to dedicate significant amounts of their time.

“The advice that I would have to offer is be prepared for a long-term relationship. Be prepared for an additional workload. ... But it's so worthy. It's so important that [communities] recognize that we can't sit around and just complain. If we see this as a problem, then we also see this as an opportunity. Then we have to go toward it rather than walk away from it.”

– Leader of Technical Advisory Group #7

Forming and sustaining a Superfund advisory group requires commitment, dedication, and a willingness to work with diverse community *stakeholders* and with the EPA, usually over the course of many years. It is no small undertaking, and there is no one-size-fits all prescription for success. Every community and every Superfund site is unique; so, too, is every advisory group. Each group that contributed to this project faced different challenges that they approached in different ways.

STRATEGIES THAT WORK

At the same time, many strategies emerged that worked well for a number of Superfund advisory groups – including those that reported success in working together and addressing their community's needs. The EPA *Community Involvement Coordinators (CICs)* who contributed echoed and expanded upon these ideas, based on their experiences with multiple advisory groups.

Using advisory group and CIC experiences as a base, this guidebook provides an overview of key steps, strategies, and tools, organized within six chapters:

1. Forming Your Group
2. Developing Your Vision and Goals
3. Working Toward Your Goals
4. Finding the Right Resources
5. Achieving Your Goals
6. Winding Down and Expanding Out

The steps laid out here rarely occur in a linear fashion. They are intertwined, and many happen simultaneously, especially in the beginning stages. They will also happen differently for every group.

BACKGROUND

In March 2017, residents of Frenchtown, Montana and surrounding communities met at the local fire hall to answer a question: “Would we benefit from forming a Community Advisory Group (CAG)?” The former Frenchtown Smurfit-Stone pulp and paper mill, proposed for listing as a federal Superfund site due to heavy metals and cancer-causing synthetic compounds found onsite, lay three miles upstream along the Clark Fork River. The remnants of the 3,200-acre mill site loomed large in the room.

Community members had a lot of questions – some of which had been brewing since Smurfit-Stone closed the mill in January 2010:

- Why was testing for contamination at the site, along with negotiations between the U.S. Environmental Protection Agency (EPA) and the responsible parties, taking so long?
- What were the threats of contamination to human and environmental health?
- Would the site – once a major source of taxes, jobs, and pride – ever again provide economic benefits?
- And, perhaps most importantly for this particular meeting: Could a CAG, with its limited *advisory role*, actually impact clean-up and remediation? Could a volunteer-run advisory group really influence a process ultimately controlled by the EPA, responsible parties, and a long-absent site owner?

In the end, community members opted to give it a shot. Not only Frenchtown residents, but also those from elsewhere in Missoula County, as well as downstream communities and the Confederated Salish and Kootenai Tribes, chose to invest their time and energy into what will be a years-long process. They signed up for a good deal of hard work and uncertainty, in exchange for the possibility of influencing the clean-up to benefit the larger community in the future.

THE IDEA FOR A PRACTICAL GUIDEBOOK

The Frenchtown Smurfit-Stone Community Advisory Group’s dedication, along with what I learned from the group during its first year, are the reasons I wrote this guidebook. Watching the Frenchtown CAG’s initial struggles and first successes laid the groundwork for my understanding of Superfund advisory groups. It also helped me understand the need for practical information based on real-life experiences.

Early on, Frenchtown CAG members expressed a desire to talk with and learn from other, more-experienced advisory groups. There is currently no formal Superfund advisory group network, nor is there any other straightforward way for these groups to get in touch with one another, aside from asking your Community Involvement Coordinator (CIC) to connect you or reaching out on your own. I also found no comprehensive written resources that conveyed real-life lessons learned, aside from three EPA-led reviews of CAGs, conducted decades ago and never including more than six groups.^{4,5,6} There are no similar reviews of Technical Advisory Groups (TAGs).

This guidebook is my attempt to fill this gap – and to help communities just beginning to form Superfund advisory groups to embark on their journey in a more informed way.

MY ROLE AND RESEARCH FOR THIS GUIDE

I attended that first exploratory meeting in Frenchtown, as well the first six months' worth of Frenchtown CAG meetings, as an observer. I am not a member of any of the communities represented within the group's membership, so at first I did not actively participate in meetings or volunteer for any tasks. During those first six months, I heard many more questions arise: about procedures and processes, about how to address differing *interests* and concerns related to the clean-up, and about what, exactly, the group means by the word "*community*," when it represents so many different geographic and cultural communities with a stake in the clean-up. These questions stuck with me, partly because I thought that, as a graduate student in Environmental Studies and Natural Resources Conflict Resolution, I might help answer them.

The first step I took in this direction was to conduct an assessment of stakeholder interests in the former Smurfit-Stone Mill Site clean-up. The purpose of the assessment was to help the Frenchtown CAG better understand the interests, concerns, and priorities of various stakeholders, as well as to inform the group's *mission statement* and *goals*. This involved interviewing 29 stakeholder representatives and compiling their answers into a report for the CAG. (Questions I asked for the Frenchtown CAG *Stakeholder Interests Assessment* are in [Appendix D](#).)

The second project I took on was this guidebook. In-depth interviews were the primary tool I used to learn about advisory groups' experiences and "lessons learned." I interviewed 16 leaders from 15 advisory groups, as well as four current and former CICs, all from the EPA's Region 8, which includes Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming. I used open-ended questions to gain as much information as possible from interview participants. (A list of groups I interviewed is in [Appendix B](#).)

I focused on advisory groups that had existed for at least five years and either were still operating or had recently disbanded. In all, I spoke with five leaders from five CAGs and 11 leaders from ten TAGs. There was only one group that fit my criteria that I was unable to reach: a CAG working on the Colorado Smelter Superfund Site. The CICs I interviewed all had worked with at least three advisory groups over the course of at least five years. There was one CIC who fit my criteria who I was unable to interview.

I read and analyzed interview transcripts along the way, then organized interview data into themes and categories that became the chapters and topics of this guidebook. After I had written the bulk of this guide, I went back through these themes and categories to find quotes that represented the varied experiences and perspectives of interview participants within each theme. I then added quotes to bring key concepts to life and to create a better sense of the real-life situations behind the recommendations in this guide.

Also informing this guide were my observations of and experiences with the Frenchtown CAG. These added additional information and context to the interview data and provided the context of actually seeing a Superfund advisory group forming. My research for the Frenchtown CAG Stakeholder Interests Assessment also contributed to this guide, notably the Outreach and Education section of [Chapter 5](#).

For more information about my research methods, see [Appendix A](#).

BACKGROUND ON SUPERFUND ADVISORY GROUPS

The federal Superfund program requires EPA staff to involve local residents in the investigation and remediation of hazardous waste contamination in their communities. Created by the *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)* of 1980, the Superfund program seeks community input through public meetings, information and outreach campaigns, and other avenues.

In 1986, the *Superfund Amendments and Reauthorization Act (SARA)* approved the Technical Assistance Grant program. This funding allows local nonprofit groups to hire technical advisers to help them and their communities interpret and understand testing, hazardous waste removal, and remediation plans. The first CAGs emerged in 1994, after an Environmental Justice Task Force established by President Bill Clinton recommended them as a way to enhance public involvement – especially involvement of historically marginalized groups such as people of color and people with low incomes, who are more likely to have contaminated sites in their communities.^{7,8,9}

CAGs and TAGs are volunteer groups intended to represent all local stakeholders in a Superfund clean-up and to advise EPA officials about community interests and concerns. Both types of advisory group may form specifically to address a Superfund remediation process, or they may arise from existing groups if those groups are representative of local stakeholders. Not every community with a Superfund site forms an advisory group. The EPA is required to reach out to the community and to address local interests and concerns regardless of whether an advisory group exists. On the flip side, some communities have both a CAG and a TAG, and these groups can work together to enhance public input and understanding.

CAGs and TAGs typically form early in the Superfund process – often during initial testing for contaminants, before a site is officially included on the Superfund *National Priorities List (NPL)* – and they usually operate at least until remediation is complete. (For more information on the many phases of Superfund clean-up, see the EPA’s [Superfund Cleanup Process](#) web page.) This process took an average of eight to twelve years in the early 2000s.¹⁰ More recent research shows that Superfund clean-ups have slowed considerably,¹¹ requiring lengthier involvement by CAGs and TAGs. Due to their longstanding engagement, these groups offer the EPA “a unique opportunity to hear – and seriously consider – community preferences for site clean-up and remediation.”¹² Both previous EPA research^{13,14} and my own interviews with CICs indicate that communities with advisory groups are more likely to influence Superfund clean-ups than those without them.

UNDERSTANDING THE ADVISORY ROLE OF CAGS AND TAGS

One of the biggest frustrations for both CAGs and TAGs – not to mention for the communities they represent – is their lack of decision-making authority. As an “advisory” group, your role will be to provide the EPA with local input and advice, based on the needs and concerns of community members. In the end, the EPA, and the parties responsible for clean-up costs if they can be found, will determine contamination remedies, based on the nine criteria EPA must consider by law.¹⁵ Particularly if you receive any funding or resource assistance from the EPA (see [Chapter 4](#)), your group may not file lawsuits, lobby legislators, or try to change federal laws or policies.

“Some people [would] expect the TAG would have to stand up and be advocates in certain ways. You know, ‘You guys have got to go out and sue EPA and [the responsible party] and stuff. That isn't the role of the TAG. We'll go out and we'll get the information for you. But citizens have to know ... we can't use our TAG money to hire attorneys. It's not allowed in the law. And so I think people would get frustrated. And want instant things done in a Superfund, and nothing's instant.”

– Leader of Technical Advisory Group #1

Understanding the Basics:

How does the EPA choose contamination remedies?

By law, EPA staff must use these nine criteria for evaluating Superfund remediation efforts:

- Overall protection of human health and the environment.
- Compliance with minimum federal or state standards (whichever are more stringent) for individual contaminants. These are known as [Applicable or Relevant and Appropriate Requirements \(ARARs\)](#).
- Long-term effectiveness and permanence.
- Reduction of toxicity, mobility of hazardous contaminants, or volume of hazardous contaminants.
- Short-term effectiveness.
- Ease or difficulty of implementation.
- Cost.
- State acceptance.
- Community acceptance.

Source: U.S. Government Publishing Office. Electronic Code of Federal Regulations. 2018. “Remedial investigation/feasibility study and selection of remedy.” §300.430. [National Oil and Hazardous Substances Pollution Contingency Plan](#).

At the same time, EPA policy requires the agency to “seriously consider community preferences for site clean-up and remediation.”¹⁶ Advisory groups can wield significant power as the “squeaky wheel” that EPA staff must listen to. Among other strategies, building a common *vision* for the future of your Superfund site, cultivating good relationships with EPA staff and any parties found to be responsible for contamination, and using the right resources to get the word out – all topics addressed in this guidebook – will help you gain influence.

Also keep in mind that your advisory capacity does not have to end with clean-up and remediation. Post-clean-up *restoration* and *redevelopment* of contaminated areas is a realm within which your advisory group, and your community, may have much greater influence if you so choose. You may also discover what many groups before you have learned: that your reach can spread far beyond your original goals. Many advisory groups find that their work builds and strengthens resilience, social networks, and general civic capacity in ways that ripple throughout their communities. (See [Chapter 6](#).)

ADVISORY GROUP FRUSTRATIONS AND FACTORS FOR SUCCESS

CAG and TAG members face an “inherent potential for frustration and mistrust ... in the participatory process” due to a lack of formal power in decision-making.¹⁷ Social science researchers Frances Lynn and George Busenberg note similar frustrations when other, non-Superfund advisory groups lack clear roles and powers: “In contrast to the ideal of a CAC [community advisory committee] providing useful advice on behalf of the public following informed deliberation, it is possible for a CAC to accomplish little more than to allow the venting of anxieties or the uncritical legitimization of policy decisions.”¹⁸ Research on public participation in community advisory groups both within and outside the Superfund process reveals that a lack of understanding and mastery of civic engagement processes,^{19,20} as well as different ways of thinking and communicating among community members and EPA officials,^{21,22} also may be a source of frustration and limited progress.

In spite of more than 20 years of CAGs and more than 30 years of TAGs working in communities across the country, there is little documentation of these groups’ experiences overcoming such frustrations. Academic studies specifically on CAGs and TAGs have focused mainly on relationships between these groups and the EPA,^{23,24,25,26} on the specific effects of EPA-funded technical assistance,^{27,28} or on different ways of communicating within the Superfund process.^{29,30} One notable exception is Colleen A. Lux’s 2003 master’s degree thesis on the Libby, Montana, CAG, which is an in-depth study of a specific group and situation.³¹

Fred Ellerbusch and his fellow researchers at Tufts University identify four factors for community success in influencing the Superfund process: 1) common community vision, 2) a cohesive community, 3) opportunities for *collaborative learning*, and 4) a commitment among participants to long-term engagement.³² Other research has looked at Superfund community involvement more broadly, with no specific focus on advisory groups.^{33,34,35}

THE NEED FOR PRACTICAL ADVICE FROM THOSE WHO’VE BEEN THERE

The EPA has published two documents aimed specifically at helping CAGs, including *Guidance for Community Advisory Groups at Superfund Sites*³⁶ and the *Community Advisory Group Toolkit*.³⁷ The first is for Community Involvement Coordinators, and the second is for CAG members themselves. Both focus on basic CAG start-up processes, such as determining membership, writing mission statements, establishing and publicizing meetings, incorporating as a nonprofit, and applying for Technical Assistance Grants. While certainly helpful for getting CAGs started, these papers have no information directly from CAGs.

As noted earlier, the EPA has produced three studies in which agency staff interviewed actual CAG members about their experiences.^{38,39,40} These studies provide a good deal of useful information, including the following “lessons learned,”⁴¹ some of which also arose in the interviews I did for this guidebook:

- The earlier a CAG forms, the better.
- The community, not the EPA, must take the initiative to form and operate a CAG.
- CAGs must act independently.
- CAGs must include all those with a stake in the site and clean-up.
- Access to competent, independent technical assistance is key.

- CAG members must understand what is possible, including the limitations of the Superfund process and their own advisory role, and be willing to work within those limits.
- CAG leaders in particular must be “in it for the long haul.”
- CAGs provide greater and more effective opportunities to resolve community concerns than public meetings do.
- A lack of funding for administrative, technical, and logistical support is a common CAG concern.
- Communities with CAGs can have more influence on EPA decision-making than those without CAGs.
- CAGs can speed up the process of choosing and implementing contamination remedies.

Despite the useful information contained in these studies, they are problematic for three reasons. First, there is an inherent conflict of interest when an agency studies a process it has developed and sponsored. Second, these studies all occurred more than 18 years ago, at a time when the Superfund process was both faster and better-funded.^{42,43} Third, two of the studies focused exclusively on CAGs that had been operating for between 1 year and 2.5 years, limiting the potential for a longer-term perspective from participants.^{44,45} The exception was a case study of one group in Vermont that had been meeting for five years.⁴⁶ However, since Superfund sites and the communities they impact vary widely, it seems unwise to rely on the experience of one CAG that met in Vermont in the late 1990s. Additionally, the EPA has done no similar studies on “lessons learned” from TAGs, which fulfill roles similar to CAGs, along with the additional, grant-funded role of explaining and interpreting technical information to their communities.

In an effort to fill the gaps in practical knowledge about the experiences of long-serving CAGs and TAGs, in a way that is accessible and useful to community members, my research for this guidebook took a broader view to answer the question:

What are the most effective approaches for working within the constraints of a Superfund advisory group to foster a successful, community-informed clean-up?

The findings from my research, laid out in the following six chapters, provide a basis for answering this question.



CLEAN-UP OF MINING CONTAMINATION ALONG THE UPPER CLARK FORK RIVER IN NORTHWEST MONTANA. COMMUNITY INPUT IN THE REMEDIATION, RESTORATION, AND REDEVELOPMENT OF THE UPPER CLARK FORK ARE PART OF THE CLARK FORK RIVER TECHNICAL ASSISTANCE COMMITTEE’S MISSION STATEMENT. PHOTO COURTESY CLARK FORK COALITION.

CHAPTER 1: FORMING YOUR GROUP

This chapter addresses the first steps of forming your advisory group, through the following topics:

- Membership and Representation
- Facilitation
- Making Decisions
- Working Groups (also known as subcommittees)

MEMBERSHIP AND REPRESENTATION

The U.S. Environmental Protection Agency (EPA) requires both Community Advisory Groups (CAGs) and Technical Advisory Groups (TAGs) to represent diverse community *stakeholders* in a Superfund clean-up.^{47,48} What does that mean for your community? How will you define “community”? How will you balance the need to include diverse stakeholders with the reality that some community members may be wary about participating, difficult to reach, or uninterested?

Answering these questions can be particularly difficult when a Superfund site affects more than one geographic area, watershed, or municipality – or when it affects certain people more than others. Resources such as the EPA’s *Community Culture and the Environment* guidebook,⁴⁹ as well as those listed in [Appendix C](#) of this guide, can help you understand the various meanings of community in the context of environmental issues such as contaminated land and water.

What is most important is to be as welcoming and inclusive as possible right from the beginning – especially of those who are most affected by contamination and its related health, cultural, environmental, and economic effects. If your advisory group is composed of mostly middle- and upper-income people, those with lower incomes may not feel comfortable participating. If your group is primarily white, people of color may feel awkward or misunderstood expressing their concerns as part of your group. Although people from such historically marginalized groups may sometimes be the ones forming CAGs and TAGs, this was not the case with the groups I interviewed, and it is frequently not the case in other advisory groups.

Understanding the Basics:

Who are stakeholders?

In the context of Superfund, stakeholders are those who have a “stake” in clean-up activities and outcomes. They may be interested in contamination and clean-up, affected by these issues, or capable of affecting them.

Examples of stakeholders who may be interested or affected include those who live near contaminated areas; local and tribal governments; tribal members; local business owners; schools; and environmental groups. Examples of stakeholders who may affect Superfund issues include owners of contaminated properties; state and federal governments; and responsible parties.

Adapted from: Environmental Protection Agency. 2002. Community Culture and the Environment: A Guide to Understanding a Sense of Place. EPA-842-B-01-003, Office of Water, Washington, DC.

"I think the more diverse you can be, the better off you are. ... [Also] I think you want people on the TAG that are open-minded. If you've got people that have already made up their mind and they're not willing to change their mind or at least listen to all of the science or all of the information that's presented to them, you're not going to get anywhere."

– Leader of Technical Advisory Group #4

Making a genuine and informed effort to encourage diversity right from the get-go may provide your group with a much wider array of knowledge and ideas that ultimately can help your cause and increase your group's legitimacy – both in the community and with the EPA. It is also a good way of including those community members most affected by contamination and clean-up. Consider ways you can actively work to lessen barriers to participation. Are there people who might volunteer to look after young children during meetings, or to drive members who don't have reliable transportation?

Also keep in mind that new stakeholders may emerge as testing, potential remediation activities, and other issues change who is affected, and how. You will likely reach out to new stakeholder groups and add new members as the Superfund process evolves, but how you start out will have the biggest impact on who is comfortable participating.

Here are some additional guidelines for recruiting and choosing advisory group members:

- Seek people who are willing to collaborate and cooperate. You may want to ask new members a question such as, "How will you work together with other members to achieve the vision and goals of the whole community?" Ask yourself this question, too!
- Make sure potential members understand that they must be open to others' ideas, and to changing their own, as the process evolves.
- Ensure that at least some members can commit to what may be a long-term process.
- Pay attention to power dynamics. Sometimes those who have the time, energy, or financial means to commit to joining an advisory group may have more influence than those who do not.
- If your group struggles to include individuals from certain groups, try to reach out to an organization or community leader who may at least partly represent their interests.
- Consider whether you want to include responsible parties in your group, and, if so, in what capacity. For example, many groups include responsible parties in discussions but not in decision-making. (For more information on relationships with responsible parties, see [Chapter 3.](#))

MEMBERSHIP STRATEGIES

Most advisory groups have fairly loose membership rules. Choosing the approach that works best for you will depend on the size and character of your community, as well as the level of conflict related to contamination.

"We have to go out and look for people and ask them would they like to be part of the [TAG]. People aren't knocking on our door to say, 'I want to be a part.'"

– Leader of Technical Advisory Group #9

Strategies:

Four ways of determining membership

1. Allow any community member who attends any meeting to be seen as a member for the purposes of that meeting.
2. Allow anyone who attends an established number of meetings to join the group.
3. Combine welcoming those who attend meetings with actively recruiting those who don't show up initially.
4. Create a formal application process.

Source: Advisory group and EPA staff interviews

Among the four strategies Region 8 advisory groups used, the first may work well for small, relatively cohesive communities where a core group of leaders takes on most responsibilities. However, it may make long-term progress difficult. Allowing anyone who attends an established number of meetings to become a member is a more structured variation of this approach that allows group members to develop deeper levels of trust and understanding, and to take on greater responsibilities.

To achieve good representation and diversity, you will likely want to add to members who “recruit themselves” by actively reaching out to additional stakeholders. Conducting a

Stakeholder Interests Assessment early on may help direct you to those who have been left out. For more information about these and other assessments, see [Appendix D](#).

Using a formal membership application process is less common. This approach is likely to work only if everyone in the community sees the group that chooses members as neutral and trustworthy. This could be a group of local elected officials, civic and business leaders, or others. Advantages to this strategy include the chance to intentionally include a balanced mix of stakeholders, as well as to set a collaborative tone from the get-go by requiring potential members to fill out an application and answer questions about how they would work together with others.

WHAT IS A GOOD SIZE FOR AN ADVISORY GROUP?

You may be concerned about how many members to include in your group. There is no right answer to this question. It is easier to work within a smaller group, but it is unlikely that five or even 10 people will adequately represent your community in a Superfund clean-up. Larger groups can work together effectively if they have good facilitation, clear decision-making rules, and working groups (sometimes called subcommittees). These are the subjects of the next three sections.

FACILITATION

Competent, independent facilitation can make or break an advisory group's efforts. A skilled facilitator whose personality meshes well with your group can help you set ground rules and guide you successfully through conflicts and crucial decisions. Although EPA CICs and advisory group members sometimes facilitate advisory group meetings, this approach leaves room for uncertainty and mistrust. EPA staff and some group members may be highly skilled and well-intentioned facilitators, but they are not neutral parties.

"Having a good facilitator made all the difference in the world, because she just did not allow – and that was one of the rules, too – you were not to make negative remarks about other people. You might not agree with their ideas, but ... [She] just was excellent as a facilitator and keeping the fists down."

– Leader of Community Advisory Group #2

Good facilitation does not just involve a facilitator showing up at your group's meetings and walking you through the agenda. A good facilitator should:

- Understand the issues your group faces.
- Be seen as a neutral party by all community members.
- Mesh well with your group.
- Help you establish and follow ground rules for effective meetings.
- Help you create and follow realistic agendas for each meeting.
- Encourage all group members to participate fully.
- Encourage respectful dialogue among group members as well those who attend your meetings.
- Effectively handle conflicts and strong emotions.
- Communicate with advisory group and working group leaders between meetings.

The EPA can provide both CAGs and TAGs with an independent facilitator, free of charge, through their [Conflict Prevention and Resolution Center](#). Under this program, advisory groups can interview multiple facilitators and choose which one would best meet the group's needs and personality.

MAKING DECISIONS

Before your group can make important decisions, you must first answer a central question: HOW should you make those decisions?⁵⁰ The most common methods of deciding within a group are voting and consensus agreement. These are not mutually exclusive, and in fact are often used together, especially by long-serving advisory groups. Consensus is a decision-making process that requires full participation by all group members; open, honest discussion; and collaborative learning, in which group members come to a shared understanding of the issue at hand, as well as one another's interests related to that issue.

Groups that use consensus-based decision-making usually vote at the end of their deliberations. That voting may require a simple majority but more often calls for a higher level of agreement, such as two-thirds majority, three-quarters majority, unanimity minus one or two, or full unanimity. Rather than a simple "yes" or "no" vote, some groups may use gradients of agreement, such as "whole-hearted endorsement," "support with reservations," "more discussion needed," "don't like but will support," and "serious disagreement."⁵¹

Voting without using a consensus process allows for faster decision-making, especially when not all group members agree and the group does not have time for additional discussion. However, in the context of the often controversial and emotionally charged Superfund clean-up process, failing to base decisions on open, honest discussions among all members, as well as shared understanding of issues and interests, can cause divisions in your group and the larger community. Consensus processes also can result in better decisions that encourage greater understanding among group members, strengthening your group and your community.⁵² Partly for these reasons, many Superfund advisory groups opt to make important decisions using some form of consensus agreement.

As noted above, consensus is not the same as a unanimous decision (although unanimity is one form of consensus). Consensus-based decision-making requires that all members of your group be willing and able to:

- Communicate one another's interests and values clearly and explicitly.
- Respectfully consider a wide range of perspectives.
- Make the time to talk through contentious issues, even if that means putting off a decision until later.
- Gather more information when necessary, to ensure that all group members share a common understanding of the issue and feel they can make an informed decision.^{53,54,55}

"When [advisory group members] feel like we've got a split board, what we do is talk more about it or table it until we can get more information to help inform us about one or the other side of whatever the issue is, and we bring it up again. I think if we couldn't agree on something, if we were split, we wouldn't weigh in on it. ... Why we agree so much is that if a person on the board raises their hand and says, "I really feel that this is a huge issue," we say, "Tell us more about it."

– Leader of Technical Advisory Group #5

Strategies:

Conditions that foster consensus-based decision-making

- Everyone shares an overarching vision or goal.
- All stakeholders are represented.
- Everyone participates actively, and no one's voice is left out of the discussion.
- Group members trust one another.
- You have enough time to talk through your decisions.
- You have a skilled facilitator who can lead you through the options and help you choose a decision-making rule.
- Everyone clearly understands the decision-making process you have chosen.

Sources: ["Consensus Decision Making" Seeds for Change.](#)

[Consensus Decision-Making: A Virtual Learning Center for People Interested in Consensus.](#)

Your group's decision-making rules may change as members work together over longer periods of time. In addition to the sources included in this section, additional decision-making resources are listed in [Appendix C](#).

WORKING GROUPS

No matter how skilled your facilitator or how well-thought-out your decision-making rules, it will be difficult to get much work done in your general advisory group meetings. Presentations, public comments, and procedural issues will take up much of your time. Working within larger groups can be challenging and time-consuming – especially if you want to make sure everyone’s voice is heard.

Working groups, also known as subcommittees, allow members to focus on important issues in small groups – often just 3-5 people – between full advisory group meetings. These groups can more effectively tackle crucial tasks, then bring their work back to the full group for a decision, for informational purposes, or for direction on how to move forward. Working groups also allow members to share their skills and expertise in meaningful ways that may not be possible in a large group setting, potentially increasing long-term engagement.

“The main thing is to have the structure of the group divided into task groups. Subcommittees. And have people volunteer, or we assign them to work on those subcommittees. To the extent that those subcommittees are active, people’s interests remain piqued, and to the extent that they’re not, or the subcommittees aren’t effective, then they sort of drift.”

– Leader of Technical Advisory Group #6

Strategies:

Other ideas to consider

During the formation stages, your advisory group may also wish to establish:

- Leadership roles such as chairperson, secretary, treasurer, etc., as necessary.
- Meeting times and locations that are convenient for your members and encourage public attendance.
- Ground rules for respectful communication.
- Rules for creating meeting agendas.
- Standards for recording your meetings through written minutes, video, or both.

Additionally, some groups found it useful to incorporate as a nonprofit organization through a state agency – usually the secretary of state. This relatively cheap and simple move allows advisory groups to accept donations and grants, to set up a bank account, and to protect their members from lawsuits. Check with your secretary of state for more information.

Source: Advisory group and EPA staff interviews

Working groups should fit a community’s needs. Examples of CAG and TAG working groups include:

- Framework committees that develop draft bylaws and other initial rules or guidelines.
- Technical advisory committees composed of those with technical or scientific expertise who can explain EPA documents to the rest of the group.
- History and culture committees that focus sharing your community’s heritage.
- Land-use committees that explore potential redevelopment and restoration efforts.
- Recreation committees that look at future recreation possibilities.
- Public outreach and communications committees that create educational materials, handle media requests, and coordinate community outreach and involvement.
- Education committees that work with local schools and educators.
- Visioning committees that lay the groundwork for building a common vision for the future of the Superfund site and your community.

CHAPTER 2: DEVELOPING YOUR VISION AND GOALS

This chapter addresses:

- Building a Common Vision
- Visioning Strategies
- Putting Your Vision to Work

BUILDING A COMMON VISION

“Those goals and our community vision has been the driver for every effort that we've undertaken.”

– Leader of Community Advisory Group #1

Establishing a common vision for your community's future that incorporates Superfund clean-up and remediation can greatly benefit your work. Such a vision typically extends beyond remediation to one or both of the other “R's”: restoration and redevelopment.

A common vision can:

- Reinforce shared values in your community and within your advisory group.
- Promote collaboration and cooperation among those with differing perspectives.
- Increase community interest in the Superfund process.
- Encourage long-term engagement.
- Provide EPA staff with a blueprint to make sure *remedial actions* are consistent with future development goals.
- Promote future economic, recreation, and/or restoration opportunities.
- Allow community members to “buy in” to specific remedial actions.
- Help your advisory group establish or refine its goals.
- Provide a framework for group decisions.

Understanding the Basics:

The three R's

- **Remediation:** Action taken to clean up or “remedy” contamination. This is the primary goal of Superfund and is covered by funds from responsible parties and/or federal taxpayers.
- **Restoration:** Efforts to return a place to a state of ecological, environmental, and cultural health. Superfund does not pay for restoration, but state agencies often can. Check with state health and environment agencies for more information.
- **Redevelopment:** A way to provide economic and public benefits, typically involving adding or upgrading infrastructure. May include business, housing, recreation, and other uses. Local, state, and private funds may contribute to redevelopment.

Establishing a common vision within the wider community can be extremely challenging. Among the barriers are:

- Private ownership of land.

- Long timeframes that require planning years or even decades into the future.
- Differing interests and values within your community.
- Difficulty defining “the community” when a site encompasses multiple geographic areas and governments.

It is rare for any community to enter the Superfund clean-up process with a clear end goal. Varied viewpoints within the community may at first appear to be irreconcilable. Fear, mistrust, and reams of technical information may leave citizens unable to see beyond immediate fears and concerns. In some cases, when a Superfund site exists outside a community’s political boundaries and does not pose an immediate threat to human health, some may be indifferent to the outcomes.

These barriers are not insurmountable. Working with private landowners and responsible parties can help these stakeholders to develop plans that will both serve their interests and improve their image in the community. Taking the long view can help everyone see what is most important to the community and provide an end goal to move toward. The visioning process can also bring out and emphasize shared interests and values – even among community members who thought their ideas were completely opposed.

“The only thing that I know of that holds us together is this long-term vision. If we just keep at it, if we just keep going, sooner or later this river's going to be clean.”

– Leader of Technical Advisory Group #5

VISIONING STRATEGIES

If your group has adequate representation, good facilitation, clear decision-making processes, and active working groups as laid out in [Chapter 1](#), it may be possible to work toward a common vision at your regular meetings. However, this process can take a lot of time and should involve as many community stakeholders as possible. You are more likely to be successful if you can dedicate a series of community meetings and other activities to this topic.

Below are approaches for facilitating a common vision, all of which can be used jointly or separately:

- An assessment of stakeholders’ interests in contaminated land re-use, based on interviews with representatives of all stakeholders in your community. This approach requires a neutral facilitator or other expert to work with your advisory group to develop a plan, set up interviews, and write a report of findings. More information is available in [Appendix D](#).
- Workshops dedicated to discussing future possibilities. This approach requires careful planning, goal-setting, and facilitation to ensure that attendees remain focused and productive. It is best to begin with a number of potential future visions that community members can comment on and adapt, rather than trying to start from scratch.
- Design workshops. These typically involve drawings or other graphics that help citizens visualize what the Superfund site and the community might look like in the future. Presenting multiple representations may help community members imagine positive outcomes they may not have considered otherwise. As with other visioning workshops, community members can suggest

changes and ideas that planners, architects, and others can incorporate for future charrettes and meetings.

All of the approaches listed above require human and financial resources that may seem out of reach in the beginning stages of developing your advisory group. However, resources are available for visioning activities, including EPA funding, state funding, in-kind donations from local businesses, and advisory group members' own skills and expertise. More information on resources is available in [Chapter 4](#).

Visioning exercises rarely result in one clear, final endpoint. As an advisory group, many factors will be out of your control. Some groups develop one solid vision, while others generate multiple ideas for what may be possible in the future, then refine them over time. Regardless of the initial outcomes, the process of creating a common vision should define or refine your group's goals.

PUTTING YOUR VISION TO WORK: DEFINING OR REFINING YOUR GOALS

You will likely decide on a mission statement and initial goals as your group is forming. These may be broad or narrow, and they may reflect a wide range of values and interests. (Examples of Region 8 advisory groups' mission statements and goals are included in [Appendix B](#).) After you have established a common vision or visions, refine your goals – and possibly your mission statement – based on this over-arching view.

In some cases, an advisory group's goals may be less about the exact future of contamination or the community, and more about improving the process for getting there. Some groups' main goals are ensuring transparency, distributing information, providing a forum for community input, or making sure all local stakeholders have a say individually.

Many advisory groups did not try to achieve a common vision within their communities. In general, these groups worked within the broader goals of sharing information, educating their communities, and working to ensure adequate clean-up levels to protect human health and the environment.

Understanding the Basics:

Vision ... Goals ... Mission ...

What's the difference?

- **A vision** is an over-arching plan for the future of a Superfund site and, sometimes, the larger community. Visions may be broad or specific. Ideally a vision is based on extensive input from community members.
- **Goals** are the smaller steps that move you toward your vision. Superfund advisory groups may develop goals, and often goals within goals, to support the community's vision.
- **A mission statement** is a clear and concise summary of an advisory group's vision and goals. Some groups have a statement of purpose, vision statement, or overarching goal instead of a mission statement.

Source: Advisory group and EPA staff interviews

CHAPTER 3: WORKING TOWARD YOUR GOALS

To make progress on your goals, your advisory group must build relationships both internally and externally. This involves:

- Fostering Trust within Your Group
- Learning Together
- Understanding Technical, Scientific, and Policy Information
- Keeping Your Group Engaged for the Long Haul
- Building Relationships with the Decision-Makers

FOSTERING TRUST WITHIN YOUR GROUP

“Building trust is transparency. It’s putting things in the newspaper. It’s talking about things that are complex in a way that’s not condescending, ever, and when there are disagreements, say so.”

– Leader of Technical Advisory Group #2

Learning to trust your co-members may take time, and trust may not exist among all members at all times. For some advisory groups, simply working together on a common goal can create the necessary conditions for trust. So can achieving small successes along the way. Other groups – especially more diverse groups – must actively work to develop and maintain trust among members with differing interests, values, and backgrounds.

Building trust within your group can have many positive and lasting effects, including:

- Increased respect for one another’s views, and the views of the community members you represent.
- Increased learning within the group and the community.
- Better decision-making.
- Greater community resiliency.
- Life-long friendships.

Strategies:

Ideas for building trust within advisory groups

- Following ground rules for respectful communication.
- Being transparent with information and decision-making.
- Spending time together outside of meetings.
- Taking joint field trips to monitor testing and clean-up progress.
- Eating together. Some groups had food at every meeting; one set up potlucks outside of meetings.
- Giving members the opportunity to share their knowledge through presentations, work on subcommittees, or other contributions.
- Including and respecting diverse points of view in everything you do.

Source: Advisory group and EPA staff interviews

LEARNING TOGETHER

Collaborative learning is the process of gathering information and sharing knowledge as a group, as well as understanding one another's interests and concerns related to the topic at hand. Trust and collaborative learning tend to reinforce each another. The more advisory group members trust one another, the more they trust one another's knowledge and expertise; the more members are able to demonstrate their own knowledge and expertise, the more their co-members tend to trust them. Collaborative learning also provides other benefits, including:

- Understanding different interests, concerns, and perspectives within your community.
- More thoroughly understanding complicated scientific and technical information.
- Allowing local community and environmental knowledge to stand alongside scientific knowledge.
- Putting scientific and technical information in the context of community values and interests.
- Keeping members engaged over time.

Like trust, collaborative learning may happen naturally, as advisory group members listen to one another during regular meetings. However, this does not always occur, especially if some members dominate the conversation and others are reluctant to speak up.

"We'd almost always, when we had public meetings with speakers, we would have three speakers. This is important because we always wanted to show that there were not two sides to the issue, that there were at least three sides or perspectives. ... The Q&A is more engaged because the speakers question each other ... and that helps the learning of the group overall, if you get more back and forth. It becomes a conversation and not a presentation to a group."

– Leader of Technical Advisory Group #2

Here are some ways Superfund advisory groups have encouraged learning within their groups:

- Treating every member as an expert in their own realm of knowledge.
- Allowing members to present topics on which they have expertise.
- Allowing members to create and serve on working groups based on their interests.
- Employing neutral facilitators and technical advisers to help the group learn together productively.
- Encouraging presentations and discussions led by experts from local and regional governments.
- Including multiple (ideally, three or more) points of view on every topic presented.

UNDERSTANDING TECHNICAL, SCIENTIFIC, AND POLICY INFORMATION

Testing for and cleaning up hazardous wastes within the federal Superfund program is a complicated process, based on a wide range of technical and scientific information, as well as government policy. No one can be an expert in all of these areas. There are, however, things you can do to help your group get a better handle on what they need to know to make well-informed decisions. One of these is encouraging collaborative learning – the topic of the previous section.

It is not necessary for every member of your group to understand every aspect of the Superfund clean-up process. It is crucial, however, that everyone develop a common understanding of the basics, to the point where they feel comfortable with decisions the group as a whole is making.

"I think our biggest successes have been the ability to, through the use of a technical adviser, to be able to understand the issues as they relate to the science ... It's been a huge learning curve for all of us. Like I said, there's still a lot of unknowns, but gosh, from where we started we've come such a long way."

– Leader of Technical Advisory Group #4

"It was really open for questions and trying to understand how things worked, and that's a really important part of how the group was working together, too. There were never any stupid questions. Everybody needs to understand what's happening here, so just ask if you don't understand it."

– Leader of Technical Advisory Group #8

Below are ways your group can tackle complicated technical, scientific, and policy information. Most groups use more than one of these approaches, all of which are included in more detail in [Chapter 4](#).

- Include questions about understanding of technical, scientific, and policy information in a Stakeholder Interests Assessment. See [Appendix D](#) for more information.
- Choose and hire a technical adviser or advisers through the EPA's [Technical Assistance Grant](#) program. Ensure that advisers have the proper scientific background to fully understand your specific site. This could include expertise in hydrogeology, microbiology, chemistry, waste treatment and disposal, or other relevant disciplines.
- Allow the EPA to provide an independent technical advisor for you through its [Technical Assistance Services for Communities \(TASC\)](#) program.
- If members of your advisory group have relevant technical, scientific, or policy expertise, ask them to form one or more working groups to review Superfund documents and other related research. Require these groups to explain the information to the full group, in layperson's terms, at general meetings.
- Ask local staff from relevant city, county, state, tribal, and federal government agencies to attend your meetings to provide their expertise (and perhaps become members of your group!).
- Work with local and regional nonprofits and for-profit businesses that may have their own experts, or connections to outside experts.

Strategies:

Tips for understanding

Regardless of how you figure out technical, scientific, and policy information, be sure that you:

- Rely on experts your group trusts and respects.
- Include multiple perspectives from diverse sources.
- Keep an open mind. There are many ways of knowing that shape people's understanding of scientific and technical issues.
- Actively encourage asking questions.

Source: Advisory group and EPA staff interviews

KEEPING YOUR GROUP ENGAGED FOR THE LONG HAUL

The slow pace of Superfund clean-ups means that your group must plan for long-term engagement. Many advisory groups work for 20 years or more, often with the same core group of volunteers. Frustration and burnout are common occurrences, and not all groups make it for the long haul – or want to. Those who do continue their work over many years sometimes do so out of sheer determination to ensure the health of their communities.

“Try to imagine keeping a volunteer citizen group together for close to 25 years. ... It's really hard, because you get fatigued, trying to fight the same battle for 25 years. ... I have to say, many of us are discouraged, and frustrated. And we've gone through ups and downs for sure. ... So I do think the people on the TAG group have to be pretty darn stubborn, because staying involved in a conservation group for 25 to 30 years is asking a lot.”

– Leader of Technical Advisory Group #5

In addition to fostering trust, collaborative learning, and shared understanding, groups have many ways to engage their members. Chief among these are allowing them to contribute to the group's success in tangible ways. Groups have created working groups on community history, education, technical information, redevelopment uses, and restoration possibilities, among others, to make use of specific talents. While it is important not to ask too much of volunteer members, most groups have found that those who do tangible work for the cause are more likely to stick around than those who come to meetings without actively engaging. An added benefit is distributing the work load to keep core members from doing too much and getting burned out.

Other ways to keep members involved include:

- Set clear group goals based on a common vision for the future of the Superfund site and, perhaps, the community itself.
- Actively recruit new members to bring in fresh ideas and enthusiasm.
- Make meetings productive, interesting, and easy-to-understand.
- Hire (or ask EPA staff to provide) a skilled facilitator and an engaging technical adviser who can help the group maintain enthusiasm.
- Celebrate small successes along the way. Praise group members for working well together, setting initial goals, and making progress toward your goals and vision. Mark your one-year anniversary with a potluck. Find every opportunity you can to positively reinforce the good work your group is doing for your community.

“Don't be disappointed when your participation lacks for some reason. Certainly make efforts to try and get them back, but realize that that's standard I think. That's normal. It's going to be hard to get participation meeting in meeting out. It's just human nature. People are busy and would much rather be home watching TV than going to some meeting in town. ... Anticipate that. It's going to happen. And don't be discouraged, and don't give up either. Keep going.”

– Leader of Community Advisory Group #3

At the same time, understand that not every member of your group will stay engaged for years. You will most likely rely on a core group of members, along with others who participate for shorter lengths of time.

BUILDING RELATIONSHIPS WITH THE DECISION-MAKERS

The relationships you cultivate with EPA staff, state agencies, and, when possible, parties responsible for contamination, will hugely affect what you can accomplish. CAGs and TAGs have positively influenced remediation, restoration, and redevelopment by cultivating mutually beneficial relationships with those who make the decisions.

The EPA typically works with a state agency to carry out the Superfund clean-up process, and in some cases the state agency takes the lead role in this partnership. Every state agency works differently, and the EPA-state partnership is different at every site. For these reasons, this guidebook does not focus on relationships with state agencies. However, much of the advice given for working with EPA staff also applies to state-level staff.

Working with those who control the Superfund process can be challenging. Individual personalities on all sides play a crucial role, both for good and for ill. Due to turnover among EPA and state agency staff, you may have to build relationships with multiple people over the years. It can also be difficult to overcome the inherent power imbalances between those who will determine the outcomes of a clean-up and your community, which will have to live with the consequences.

Strategies:

Building good relationships

- Remember that agency and responsible party representatives are people, too.
- Frame these relationships as partnerships, and encourage agency and responsible party staff to do the same.
- Find ways to hold these partners accountable without being hostile.
- Get to know agency and responsible party staff one-on-one.
- Get a rough timeline of testing and clean-up activities from the EPA and responsible parties. This can help keep everyone on the same page, even if timelines change (as they most certainly will.)

Source: Advisory group and EPA staff interviews

RELATIONSHIPS WITH EPA STAFF

“Make sure that every time [EPA staff] come to town, there's an opportunity at least once to have a beer with them and find out – hell, I found out stuff about [our Project Manager's] mom. Get to know them, because when you get to know them, then they get to know you and then they start caring a little bit more about your community than maybe one that is giving them a hard time.”

– Leader of Technical Advisory Group #9

In most cases, the EPA Community Involvement Coordinator (CIC) and *Project Manager* will be your main points of contact. As their name suggests, CICs are responsible for involving the community, as well as for serving as a liaison between the agency and the community. Project Managers are in charge of the technical and scientific aspects of Superfund clean-ups.

It is important to get to know these people outside of your regular meetings. When they are in town, invite them to lunch, dinner, or to join you for a drink. The more they get to know you, the more they will understand, and perhaps empathize with, you and your community.

Also don't be afraid to contact other state agency or EPA employees who may be able to answer specific questions, especially if you don't feel that the responses you're getting from your CIC or Project Manager are helpful. Push the agency – respectfully – for the clean-up that your community needs.

At the same time, understand that both funding and federal law⁵⁶ constrain what EPA staff can do. EPA staff must work within the parameters of agency policy, current staffing levels, and available resources.

Additional suggestions for working with EPA staff include:

- Assign one member of your advisory group to be the primary EPA contact person. (But don't restrict other members from calling to voice their personal interests and concerns.)
- Create clear bylaws so EPA staff understand how your group works.
- Establish a common vision and goals that let EPA staff know where you're headed.
- Hold EPA staff accountable by keeping detailed, written records of your communications with them and following up if they don't address particular concerns when they say they will.
- If EPA staff say something in a public meeting that you feel is inaccurate, offensive, or unhelpful, contact them after the meeting, in private, to explain your concerns.

"We give the squeaky wheel the grease, so push, push, push. ... That's how we kept getting more resources, because [one advisory group] kept going higher and causing more headaches. ... We're not going to change certain things we do, because we have to follow the law depending on whatever clean-up technologies are around. ... So also realize to temper your expectations on what all that pushing may get you. But it'll get you a lot more than if you don't say anything at all."

– Community Involvement Coordinator #4

"A couple of people seem to think that we should not antagonize the agencies. Well, sometimes in order to get results, in order to get answers, you have to have a little bit of an antagonistic relationship with the agencies. I mean, not to the point where you're demanding things, but just digging. ... Sometimes it feels almost like they go, 'Okay. You have it your way this time.' Little victories like that make them know that we're on top of things, too."

– Leader of Community Advisory Group #4

RELATIONSHIPS WITH RESPONSIBLE PARTIES

Not every site has a responsible party that is able and willing to work with the EPA on remediation. Responsible parties may have died, disappeared, gone bankrupt, or otherwise be incapable of paying for clean-up costs. When responsible parties are able to contribute, the EPA must negotiate with them to determine their specific responsibilities surrounding testing and remediation, as well as how much they will be required to pay.

Negotiations between the EPA and responsible parties can slow the clean-up process. They also can frustrate your advisory group members, since these talks are typically held in secret, and you may never know their details. In some cases, local governments are responsible parties, adding a layer of complexity to advisory groups' relationships. At the same time, working with a responsible party also can provide advantages and opportunities.

“What I think is the greatest obstacle to being effective in moving forward with the process is to perceive of ‘them’ and ‘us.’ ‘They’re the bad guys. We’re the good guys. We’re going to make the best outcome happen.’ We still want to make the best outcome happen. But the only way we’re going to do that is to be open to engagement opportunities, and to communicate effectively and create invitations to meet and to hear from [the responsible party].”

– Leader of Technical Advisory Group #7

If a responsible party owns all or part of your Superfund site, that company has an incentive to work with your advisory group to find clean-up and redevelopment solutions that are beneficial to your community. Even if the responsible party is not the site owner, the potential for good or bad publicity surrounding the site can be a strong motivator as well.

Many of the same strategies for working with EPA staff apply to responsible party representatives. Others include:

- Communicate directly with responsible party representatives, rather than always relying on EPA staff to be an intermediary. This can both speed up decision-making and provide you with more information.
- Invite responsible party representatives to attend your advisory group meetings; remember that they are stakeholders, too. Whether you allow responsible parties to participate in decision-making will be up to your group and your particular situation. Keep in mind that advisory groups receiving resources from responsible parties are not eligible to receive Technical Assistance Grants.
- Find opportunities to publicly praise responsible parties for their efforts so far, especially in the media. The more good press they receive, the more likely they are to sympathize with your community.
- Encourage EPA staff to take their time negotiating agreements with responsible parties. The more detailed these agreements are, the lower the likelihood of disputes and clean-up slow-downs.

“Our main strategy was to constantly thank [the responsible party]. ... In fact, I think that that was one of the best things about the way the group worked is that we worked really closely with [the responsible party], and they weren't the bad guy all the time. We would constantly say, ‘My god. They spent \$80 million cleaning stuff up, and it made a huge positive difference.’”

– Leader of Technical Advisory Group #2

CHAPTER 4: FINDING THE RIGHT RESOURCES

No advisory group can accomplish its goals alone. Luckily, a wealth of resources exists to help you on your way. These include:

- Advisory Group Members with Specific Skills and Expertise
- EPA Community Involvement Coordinators
- Technical Assistance Grants
- Other EPA Funding and Assistance
- Additional Government Resources
- Elected Officials
- Colleges and Universities
- Nonprofit Organizations
- Business Partners
- Other Superfund Advisory Groups

When seeking resources, prioritize your efforts based on your vision and goals. Determine which will provide the most benefits for the time it takes to seek them out. For example, partnerships with other organizations can provide major long-term benefits, but they require a lot of initial groundwork and relationship building. Carefully consider partnerships and funding to make sure the goals of partners and donors align with those of your group and reflect positively on your work in the eyes of the community.

This chapter focuses primarily on resources that may be available within your community. A list of additional resources – including national organizations, websites, and printed materials not included here – comprise [Appendix C](#).

ADVISORY GROUP MEMBERS WITH SPECIFIC SKILLS AND EXPERTISE

Before you go looking for outside resources, don't forget to use the resources you have within your group. Community members often join advisory groups because they feel they have something to offer. Allowing them to use their skills and knowledge can help with long-term engagement as well as the success of your group. Among the many skills and areas of expertise your group may find useful are:

- The ability to take good notes and record minutes.
- Writing and editing skills for writing letters and press releases.
- Publishing and design experience to create newsletters, websites, and other communications materials.
- A large social network to which they can reach out and engage.
- Social media expertise.
- Local or traditional environmental knowledge.
- Technical knowledge, such as a background in engineering or restoration.
- Scientific knowledge in such fields as hydrology, chemistry, biology, and many others.
- Grant-writing and fundraising experience.

- Teaching experience.
- Administrative skills to keep your group organized.
- Cooking skills. Having food at your meetings can boost morale, forge good relationships, and increase attendance.

Before choosing to rely on advisory group members to take on such tasks, an atmosphere of trust and collaborative learning must be present. (Fostering Trust and Learning Together are topics addressed in [Chapter 3](#).) If there is a chance that conflict will arise if a member takes on an important or controversial task, it is best to either form a multi-member working group or use independent outside resources instead.

EPA COMMUNITY INVOLVEMENT COORDINATORS

As their title indicates, the role of EPA Community Involvement Coordinators (CICs) is to involve community members in decision-making on issues that affect them. This includes helping interested community members establish advisory groups. The CIC assigned to your community has a wealth of knowledge about EPA resources, advisory group dynamics, and strategies for working well together. They also work closely with the Project Manager and others assigned to work on contamination in your community. In short, your CIC can be one of the most useful resources you have.

TECHNICAL ASSISTANCE GRANTS

[Technical Assistance Grants](#) (also known as [TAGs](#)) provide initial funding of up to \$50,000 annually for advisory groups to hire an independent technical adviser – or multiple advisers – to help them interpret and assess documents about contamination, testing, remediation, and other Superfund issues. Groups that receive Technical Assistance Grants become known as TAGs – Technical Advisory Groups or Technical Assistance Groups. Only nonprofit organizations may apply for these grants, so your group must either incorporate through the appropriate state agency – usually your secretary of state but sometimes another agency – or partner with an existing nonprofit that is a member of your group and can apply for the funds on your behalf.

Strategies:

Nonprofit incorporation

Incorporating as a nonprofit to allow your group to receive a Technical Assistance Grant is relatively simple and inexpensive. For example, in 2018 the Colorado Secretary of State charged a \$50 initial fee and \$10 for annual renewal fee for nonprofit corporations, and the Montana Secretary of State charged \$20 annually. Incorporating at the state level also requires far less paperwork than incorporating as a 501(c)(3) nonprofit through the federal Internal Revenue Service. Unlike 501(c)(3) organizations, state-endorsed nonprofit organizations are not tax-exempt, and donations to state nonprofits cannot be deducted from donors' own taxes.

Sources: Community Advisory Group Toolkit: For the Community. Environmental Protection Agency. EPA 540-R-97-037, Phone conversations with staff from Montana and Colorado secretaries of state.

Advisory groups also may use Technical Assistance Grants to pay for office supplies; memberships in organizations that assist with capacity building; and other miscellaneous expenses. Advisory groups can use up to 20% of their Technical Assistance Grants to hire a grant administrator to handle paperwork and reporting. Even with this provision, some CICs discourage communities from taking on these grants, mainly because the large amount of work involved can take away from an advisory group's primary vision and goals.

Some TAGs also expressed frustration at the amount of paperwork and complicated rules surrounding Technical Assistance Grants. A few recommended seeking funding sources not associated with the EPA – especially other grants but also donations from businesses, and individuals. Most, however, said that Technical Assistance Grant funding had been essential to becoming fully informed about contamination and proposed remediation and in sharing that information with their communities. Some TAG leaders said the ability to choose a technical adviser or advisers – as opposed to having one assigned to you, as is the case with other EPA technical assistance programs listed in the following section – is a key benefit of Technical Assistance Grants. One stressed the importance of hiring technical advisers with the scientific background to fully understand your specific site. This could include expertise in hydrology, geology, chemistry, waste treatment and disposal, or other relevant disciplines.

Finally, be aware that your group will be ineligible to receive a Technical Assistance Grant and become a TAG if you receive support from any of the following groups. This includes financial support as well as including anyone from these groups as members of your advisory group:

- Responsible parties.
- Academic institutions, including colleges and universities.
- Local government, including cities, counties, and “other groups established or supported by government.”⁵⁷

Understanding the Basics:

Technical Assistance Grants

More information about Technical Assistance Grants is available through the EPA's [Technical Assistant Grant Program](#) website, as well as in the brochures listed below, all of which are available from your CIC or free through the [National Service Center for Environmental Publications](#). (For more information about searching in the Center for Environmental Publications, see [Appendix C](#).)

- *Superfund Technical Assistance Grants*. 1993.
<https://nepis.epa.gov/Exe/ZyPDF.cgi/10001X33.PDF?Dockey=10001X33.PDF>. EPA 540-K-93-001.
- *Technical Assistance Grant (TAG) Program: Fact Sheet*. 2003.
<https://nepis.epa.gov/Exe/ZyPDF.cgi/2000L24C.PDF?Dockey=2000L24C.PDF>. EPA 540-F-03-002.
- *Technical Assistance Grant (TAG) Program: Managing Your TAG*. 2003.
<https://nepis.epa.gov/Exe/ZyPDF.cgi/P100PGXS.PDF?Dockey=P100PGXS.PDF>. EPA 540-R-01-11.
- *Technical Assistance Grants (TAG): How to Find and Select a Technical Advisor*. 2005.
<https://nepis.epa.gov/Exe/ZyPDF.cgi/P100A0UE.PDF?Dockey=P100A0UE.PDF>. EPA 540-F-05-010.

Source: National Service Center for Environmental Publications, Environmental Protection Agency.
<https://www.epa.gov/nscep/how-search-publications-using-simple-search>.

OTHER EPA FUNDING AND ASSISTANCE

The EPA also can provide Community Advisory Groups (CAGs) with an independent technical adviser through the agency's [Technical Assistance Services for Communities \(TASC\) Program](#). Through TASC, the EPA hires a contracted technical adviser for the CAG, based on the issues specific to the particular site and community. This program does not allow CAGs to choose their technical adviser, but the group also does not have to spend time applying for grants or hiring the adviser.

Independent facilitators are available to both CAGs and TAGs through the EPA's [Conflict Prevention and Resolution Center](#). Advisory groups may interview multiple facilitators and choose the one who best works with their needs and personalities, but the EPA pays for the facilitator directly, allowing the advisory group to avoid managing a grant.

Additional EPA resources are available on the [Superfund Community Involvement Tools and Resources](#) web page. Although these materials are aimed at CICs, they can help your group improve community outreach and education efforts. They may also provide insights into how the EPA approaches outreach and involvement. Among the resources available here are:

- A [Technical Assistance Needs Assessment \(TANA\)](#) to determine whether your community would benefit from a technical adviser or other EPA technical assistance.
- Additional information on the TASC and TAG programs.
- Advice for using social media.
- Strategies for communicating with the public.
- Information on creating brief, easy-to-understand fact sheets.
- Posters detailing the Superfund process.

ADDITIONAL GOVERNMENT RESOURCES

Local, state, tribal, and federal government agencies all may provide assistance – especially technical expertise related to water quality, natural resources, wildlife, cultural sites, and numerous scientific disciplines. Having staff from these agencies as members of your advisory group can be a huge help. Be aware, however, that local government officials – whether elected or not – cannot serve on or provide resources to advisory groups that receive TAG grants. Even if they are not members of your group, agency staff may be available to present additional information and points of view during meetings and discussions.

Which government agencies you work with will depend on:

Strategies:

Examples of government agencies that may work with your group

- Local water quality districts.
- City and county planners.
- State environmental agencies.
- State wildlife agencies.
- Tribal natural resources departments.
- Tribal councils.
- U.S. Forest Service.
- U.S. Fish and Wildlife Service.

Source: Advisory group and EPA staff interviews

- Which agencies are present in your community.
- Which agency staff have the knowledge and expertise that would be most helpful to you.
- Which agency staff community members trust.
- Which agencies have the time and resources available to help.

At the state and federal levels, grant money may also be available to support either your group or specific clean-up-related activities. In particular, some state agencies may provide funding for restoration, redevelopment, water-quality monitoring, or education efforts.

ELECTED OFFICIALS

Elected officials – especially U.S. senators, congressional representatives, governors, and state legislative representatives – are in a unique position to influence the EPA and state agencies on behalf of your community. Reach out to your elected representatives early and often, to ensure that they are aware of Superfund issues in your community. Use their authority sparingly, however. Although legislators have spoken out loudly on behalf of communities where Superfund sites pose a serious and immediate public health threat, they may be reluctant to weigh in on every situation.

When choosing to work with elected officials, also consider your relationships with EPA and state agency staff, as well as responsible parties. Working with these partners to solve problems as they arise may prove more productive than using an elected representative as a go-between – a situation that could cause unnecessary conflict and erosion of relationships.

COLLEGES AND UNIVERSITIES

A college or university near your community may offer a huge number of resources. Professors and instructors may provide technical expertise or research into a wide range of issues, ranging from health problems to water quality testing to conflict resolution. Many college programs require service learning or internships, and students especially may be willing to work with your group on specific projects. Though students may work for free, consider paying them if you have the resources available – especially if you wish to work with students from less-privileged backgrounds who may provide valuable perspectives on your work but cannot afford to work for free.

Keep in mind that advisory groups that receive resources from academic institutions may not receive Technical Assistance Grants.

Strategies:

Ways colleges and universities can help

- Building websites and blogs.
- Creating outreach and educational materials.
- Researching contamination issues.
- Interpreting scientific and technical information.
- Helping resolve and mediate conflicts.
- Reaching out to segments of the community that have not been involved with your advisory group.
- Helping organize community visioning workshops, fundraisers, and other events.

Sources: Advisory group and EPA staff interviews, personal experience

Through the [Partners in Technical Assistance Program \(PTAP\)](#), advisory groups may work with selected colleges and universities to obtain assistance with information, education, technical, conflict resolution, or capacity-building needs. Only schools that have received grants from the National Institute for Environmental Health Sciences Superfund Research Program grants may work through PTAP.

NONPROFIT ORGANIZATIONS

Partnering with a local nonprofit organization with goals similar to your own may provide a number of benefits. Among these are the nonprofit's ability to apply for, manage, and disperse grants and charitable donations. Community foundations in particular may be set up to act as "fiscal agents" – meaning they can sponsor another organization by receiving and administering grants and charitable donations, then charging that organization a small administrative fee for this service. This allows you to raise funds without incorporating as a nonprofit yourself.

Additional benefits of working with local nonprofits may include:

- Access to grant-writing, fundraising, public outreach, and other skills.
- Access to trainings and other assistance to build your group's own capacity.
- A built-in network of supporters that already are involved with your nonprofit partner and may come to support your group as well.

BUSINESS PARTNERS

Businesses in your community may be willing to contribute to your advisory group, especially if they already have connections to your members or your goals. Those involved in outdoor recreation, tourism, real estate development, ecological restoration, architecture, and other industries that rely on a clean and healthy local environment may be obvious partners, as may businesses that your members work for or own. However, since nearly all local businesses have a stake in healthy communities, you may cast your net even wider.

Some businesses may offer monetary donations, but most will be more comfortable donating in-kind services. These may include goods and services such as:

- Drawings of potential redevelopment or restoration of contaminated lands by landscape architects.
- Food for meetings and events.
- Equipment for educational activities.
- Website development.
- Printing services and other office supplies.
- Donated items to be auctioned at fundraisers.

OTHER SUPERFUND ADVISORY GROUPS

Outside your community, there is no better resource than other Superfund advisory groups. Contacting CAGs and TAGs that have been working on contamination issues for years can be a huge help. Most advisory group members will be more than happy to talk with you about their successes, struggles, and lessons learned. Aside from gaining practical and professional insights from such connections, you may also find a sense of camaraderie among others engaged in similar struggles.

When contacting other advisory groups, keep in mind that every community and every Superfund site is unique, as are the experiences of individual groups. No advisory group has all the answers.

A list of the advisory groups with whom I spoke for this guidebook is included in [Appendix B](#), along with links to the websites of those that have them. Your CIC can also connect you with nearby groups, or with groups facing similar Superfund situations.



AERIAL VIEW OF THE U.S. MAGNESIUM SITE ALONG THE SOUTHWESTERN SHORE OF THE GREAT SALT LAKE, IN TOOLE COUNTY, UTAH. THE NONPROFIT FRIENDS OF GREAT SALT LAKE RECEIVED A TECHNICAL ASSISTANCE GRANT TO PROVIDE INPUT IN THE CLEAN-UP OF WASTES AT THE STILL-OPERATING MAGNESIUM PLANT. GOOGLE IMAGE COURTESY FRIENDS OF GREAT SALT LAKE.

CHAPTER 5: ACHIEVING YOUR GOALS

Now that you've laid the groundwork and found the resources to support your goals, how will you achieve them? Whether your goals support a clear common vision for the future, a general range of possible outcomes, or processes that ensure adequate community input, reaching them will be no small accomplishment. With no official decision-making power, your success will rely almost entirely on your ability to first understand, and then clearly and strategically convey, the needs of your community. Within these limitations are a wide range of pathways to accomplishing your goals. All fall roughly within two categories:

- Fostering community input through outreach and education.
- Advising the EPA directly.

FOSTERING COMMUNITY INPUT: OUTREACH AND EDUCATION

Effective outreach and education campaigns are essential to help members of your community have a say in the clean-up, as well as to keep them engaged throughout the Superfund process. Without knowing and understanding both contamination and the remediation process, community stakeholders cannot effectively voice their interests and concerns. Getting stakeholders involved also is key to forming a common vision and adding legitimacy to your group's work.

"We pick up the phone. We go to meetings. We invite people to meet with us. Engagement, I think, is everything."

– Leader of Technical Advisory Group #7

Keep in mind that outreach and education are both two-way streets. You will need to educate community members about contamination, the Superfund process, and the advisory group's role. At the same time, you will also need to learn from your fellow community members, who often know a great deal about past contamination and can help you understand perspectives and interests other than those represented among advisory group members. This back and forth exchange among advisory group members and their community constituents is what fosters greater understanding, better solutions, and, ultimately, a clean-up that addresses the widest possible range of community needs.

Outreach and education often go hand-in-hand, and both will evolve as you go. As advisory group members learn more about contamination issues, as well as the needs of various segments of the community, they will be better able to share and articulate these. A Stakeholder Interests Assessment or activities in the EPA's *Community Culture and the Environment*⁵⁸ guidebook can help you evaluate the information needs of various stakeholder groups, taking into account education levels, cultural backgrounds, disabilities, and other factors.

No matter how savvy your outreach campaigns or how interesting and accessible your educational materials, you will not reach everyone. Some community members simply may not be interested, even if they seem to have an obvious stake in the process. Others may be interested but still may not engage due to a number of factors, including lack of time or lack of comfort with the federal advisory group process. Don't give up on community members who don't participate or appear to be uninterested. Do the best you can to reach out to them, given the time and resources you have available. At the same time, accept that not everyone will respond to your efforts, and work with what you have.

Strategies:

Outreach and education

In addition to specific community considerations, here are some general outreach and education tips:

- Know your audience. Talk to neighbors and other community members to learn how they prefer to receive information.
- Target your efforts. Who are you trying to reach? Your plan for reaching high school students may be quite different from your plan for reaching senior citizens.
- Be strategic. Which efforts will reach the most people?
- Consider additional strategies for stakeholder groups who may be outside your regular social circles. What are the best ways to reach those who have been left out?

Sources: Advisory group interviews and interviews with stakeholders in the clean-up of the former Smurfit-Stone Mill Site in Frenchtown, Montana.

USING MEDIA TO REACH STAKEHOLDERS

Both social and traditional media outlets can help your cause. Building relationships with local reporters can earn you more and better publicity. If a new reporter shows up to one of your meetings, remember that person represents an opportunity to get your message across to others who may be new to the information you're trying to share. Take the time to explain to them key issues, as well as your advisory group's role. Below are additional ways to get the word out through traditional media:

- Maintain an e-mail list and send out regular e-mail updates to anyone who has attended one of your meetings or otherwise expressed interest.
- Write letters to the editor.
- Write articles for school and church newsletters, or for a local government or nonprofit's website.
- Don't forget the power of a well-placed poster. Put up signs around town advertising your meetings, your website, your Facebook page, or other ways of getting more information.

- Create your own newsletter or Q&A document to pass out at meetings and other events.

Social media present unique opportunities not only to educate and inform but also to network with others. Here are some tips for effectively using social media to support your work:

- Use your social media accounts to start a discussion. Ask a question about community members' interests or concerns about the Superfund clean-up, and see what they say.
- Network with other advisory groups across the country. Like and follow their social media accounts, message them, and find out how they're handling issues similar to those you're dealing with.
- Post photos or videos that illustrate contamination issues, or clean-up underway.
- Install a webcam to livestream clean-up progress.
- Build your own website or blog. Ask community stakeholders to write guest posts. You can also post surveys to get additional input.
- Create only as many social media accounts as you are able to keep up with. Remember: the key to social media is being responsive to your followers.

Strategies:

The content of your communications

To increase the chances that people will actually read and understand the information you put out:

- Skip or explain the jargon. Most people don't know what CAGs, TAGs, dioxins, PAHs, or PRPs are.
- Ask the EPA to provide a list of acronyms and technical terms relevant to the Superfund site in your community. Or make your own.
- Use bullet points and short blurbs. Long paragraphs can be intimidating.
- Include links to more information, so people can click if they want to learn more.
- Have your technical advisor or technical working group write up short executive summaries that highlight the main points of EPA documents.
- Frame your educational materials as Q&A documents.
- If some community members primarily use a language other than English, translate all materials. The EPA can provide funds for this and should already be doing so with its own documents.

Sources: Advisory group and EPA staff interviews, Interviews with stakeholders in the Frenchtown, MT Smurfit-Stone Mill Site clean-up

FACE-TO-FACE TIME

There's nothing like a real-life conversation for building trust, understanding, and, ultimately, community. You can also use in-person interactions to recruit new members and get feedback on your group's efforts. Here are some easy ways to reach out and inform members of your community face-to-face:

- Host a table at the county fair, farmers market, and other community events.
- Ask to speak at your church, at PTA meetings, and at meetings of local service or outdoor recreation organizations.

- Contact local cultural organizations, chambers of commerce, and business organizations that cater to people of color and other potentially hard-to-reach stakeholder groups.
- Talk with those you see regularly: the grocery store cashier, the barber, your co-workers and neighbors.
- Expand your network by working with local businesses and nonprofits that have similar goals and can reach out to their own clients and members.
- Work with local teachers and schools to incorporate lessons about contaminated lands, clean-up, and impacts on the community into the curriculum.
- If possible, engage community members in restoration and clean-up monitoring efforts. Planting trees, stabilizing streambanks, taking water quality samples, and counting and evaluating fish health are just some of the efforts you may be able to take on as clean-up progresses.
- Make each advisory group member responsible for talking with a certain number of people every month, sharing with them the latest Superfund news and then asking for their input. Then, at every meeting, each member can give a brief report on the views of their contacts. This allows your group to establish a larger network of informed citizens who can share their interests and feedback.

MAKING YOUR MEETINGS INVITING AND ACCESSIBLE

Attending a meeting about contamination and remediation can be intimidating, especially if it's your first time. Consider how you can make your group's meetings more inviting and accessible to community members. Though you'll need to take into account your community's particular needs and dynamics, here are some considerations that work well in most situations:

- For community members who have limited access to transportation, volunteer to pick them up and take them to meetings.
- Create a one-page Q&A document to pass out at every meeting. This sheet could include:
 - Basic information about Superfund advisory groups.
 - Your group's mission statement and overall goals.
 - A brief run-down of contamination issues.
 - A shortened version of the steps in the Superfund clean-up process.
 - Contact information for your group, your website, social media accounts, etc.
- Have a list of acronyms and technical terms available at every meeting.
- Ask all speakers and presenters to avoid jargon, spell out acronyms, and use language understandable to the average citizen.
- At the start of each meeting, tell everyone they should feel free to ask questions if anything isn't clear. Set an example by doing this yourself.
- Assign one or more advisory group members to warmly welcome anyone who is attending for the first time. This can happen before or after the meeting and should include:
 - Getting their name and contact information to add to your e-mail list.

"Not everybody understands what's going on all at once, so you have to really be patient with that process. You have to just repeat yourself all the time for people that come in and don't really know what's going on. Or even if you talked to them already, you still have to repeat what's going on. You just have to be patient with that."

– Leader of Technical Advisory Group #8

- Learning about their interests in the clean-up.
- Finding out what questions they have, including if any parts of the meeting were difficult to understand.
- Asking if they would like to set up a time to talk more, either over the phone or in person.

ADVISING

To effectively advise EPA staff on your community’s needs, your group should:

- Understand [the nine criteria the agency uses to evaluate clean-up remedies](#).⁵⁹
- Have a shared understanding of community needs and issues related to contamination in your community.
- Know when and how EPA staff will accept input from your group.
- Cultivate good relationships with your EPA contacts – a topic addressed in more detail in [Chapter 3](#).

“What’s worked well is presenting our case clearly, and unemotionally. And presenting information to EPA that points out that a CAG is more valuable than not. Being patient. There’s things going on behind the scenes that we don’t know about. ... We all just set our goals and just walked in and told them what we wanted, and just kept moving down the road. ... And every time [EPA staff] would do something that helped the CAG move forward, everybody would say thank you.”

– Leader of Community Advisory Group #5

There are times when federal law requires the agency to accept official public comments, including when considering listing the site on the National Priorities List (NPL) and once the results of a *Remedial Investigation (RI)*, *Feasibility Study (FS)*, or *Record of Decision (ROD)* are released.⁶⁰ In many cases, EPA staff will also accept official comments at other points during the development of these documents – especially from established advisory groups who ask.

Be sure to talk with EPA staff assigned to your community to ensure that your group has as many opportunities for providing input as possible. It is much easier to influence a key investigation or document while it is being developed than it is to try to make changes at the end.

Other key elements of successful advising include:

- Whenever something is unclear, ask questions.
- Put all your official comments and input in writing, at every stage of the process.
- Address all correspondence to the appropriate EPA staff.
- Copy other parties as necessary and appropriate, including additional EPA staff, state agency staff, responsible parties, local government officials, and others.

“Once it’s in writing then they have to respond to it. If you just have discussion it can get lost in the weeds. If it’s in writing you have it.”

– Leader of Technical Advisory Group #4

- Use language that aligns with that used in EPA documents and shows that your group (or at least your technical advising team) has a firm grasp on technical, scientific, and policy issues.
- Together with EPA staff, determine a reasonable timeframe for the agency to respond to and address your input and issues you raise.
- Follow up with EPA staff to ensure that they understand and address your interests and concerns.



THE FORMER COTTER URANIUM PROCESSING MILL IN CAÑON CITY, COLORADO. RADIOACTIVE MATERIALS FROM THE SITE HAVE CONTAMINATED SOILS, SURFACE WATER, AND GROUNDWATER FORMERLY USED BY RESIDENTS IN THE NEARBY LINCOLN PARK NEIGHBORHOOD. THE LINCOLN PARK COTTER SUPERFUND COMMUNITY ADVISORY BOARD'S MISSION INCLUDES INVOLVING COMMUNITY MEMBERS TO ENSURE THAT CLEAN-UP PROTECTS BOTH HUMAN HEALTH AND THE ENVIRONMENT. ILLUSTRATION COURTESY OF THE DENVER POST.

CHAPTER 6: WINDING DOWN AND EXPANDING OUT

It may be difficult to imagine when you are just starting out, but your advisory group's efforts can have a significant impact on your community – and not just on contamination issues. Advisory groups I talked with reported many wider impacts from their efforts and service, even when they didn't achieve all of their initial goals. Aside from effecting tangible change, your group can increase your community's level of civic engagement, which, according to *Civic Engagement: A Guide for Communities*:

“occurs when citizens [defined as all those who contribute to community well-being] work together as partners, collaboratively and with mutual respect, acknowledging that their own best interests are irrevocably tied to the good of the entire community.”⁶¹

This chapter addresses these “ripple effects,” as well as how to disband your advisory group when your work is done.

CONCLUSION AND CLOSURE

Knowing when to end your advisory group's work can pose an unexpected challenge. After meeting regularly for years, sharing common goals, struggles, and triumphs, parting ways can be extremely difficult. Many of your members will become lifelong friends, or, at least, highly respected partners. What's more, the long, complicated nature of the Superfund clean-up process can make “the end” seem like a nebulous, even unimaginable, state. Even after clean-up is complete, the site, or even your entire community, may experience related redevelopment, restoration, and change.

“Superfund, in a lot of people's minds, it must be over. And there's still stuff going on. Perhaps not as much, and that's reflective in some of the work of the TAG right now. ... And there's even been some discussion: ‘Is the TAG reaching its real life of usefulness? Have things become so institutionalized, that – are we being useful?’”

– Leader of Technical Advisory Group #1

For Technical Advisory Groups (TAGs), the end is slightly more concrete: when you stop receiving Technical Assistant Grant funding, you are expected to be finished. (Though some TAGs have continued working with other sources of funding and support even after they stopped receiving EPA grant money.) For CAGs, a conclusive ending becomes even hazier. Even after you've disbanded, Superfund's regular schedule of five-year reviews to determine if clean-up remedies are working may prompt you to rally your members and community networks again in the future.

Within this context, how will you know when to conclude your efforts? Ultimately, no one can decide this for you. Some groups disband once a final Record of Decision outlining clean-up remedies and activities is complete. Others wait until the clean-up itself is complete. For groups whose vision and goals include restoration or redevelopment efforts post-clean-up, a conclusion can be even further in the future. Regardless of when and how you disband, here are some ideas for making the transition a little easier:

- Celebrate! Regardless of ultimate outcomes, your group certainly has had an impact. Host a party to acknowledge all you accomplished and to thank all those who helped you along the way.
- Stay in touch. Regular social gatherings or reunions can help.
- Stay involved. If any of the land that has been cleaned up is open to the public, volunteer to help with restoration, maintenance, monitoring, or fundraising efforts. If health issues remain a problem in your community, volunteer at a local clinic or health education project.
- Hold five-year reunions for five-year reviews. When the time comes to evaluate the effectiveness of clean-up remedies, mark it as an occasion to re-connect.
- Expand on what you've learned. The skills and expertise you gained through your advisory group aren't applicable only to the Superfund process. Consider contributing your hard-won skills to other organizations and causes that benefit your community.

RIPPLE EFFECTS

Superfund advisory groups rarely influence just the clean-up of contaminated land and water. Some long-serving advisory groups evolve into entirely new organizations, with new visions and goals. More commonly, their members remain engaged in local health, environmental, and social justice issues, joining existing groups or forming new ones. Below is a brief list of ways that Superfund advisory groups and their members have had wider impacts within their communities:

- Supporting free health clinics.
- Becoming involved in environmental and social justice issues.
- Engaging in ongoing restoration efforts.
- Forming environmental nonprofits aimed at restoring watershed health.
- Forming local development corporations to market formerly contaminated lands and attract new businesses.
- Creating historical and cultural museums.
- Establishing community councils in unincorporated areas.
- Working with schools to incorporate real-life examples of contamination, clean-up, restoration, economic development, and other issues into lessons and curricula.

Your group's reach may also extend far beyond your original goals. Regardless of clean-up outcomes, the civic capacity that you build will travel with each of your members, as well as with others in your larger networks. You may find that your efforts support community renewal and resilience well into the future.

"It has been and continues to be a classic civics lesson, in how you can be effective, and the limits of that effectiveness. ... It's also been a great pleasure to work with like-minded folks, at something that really builds the community."

– Leader of Technical Advisory Group #6

Many advisory group leaders I spoke with expressed feelings of personal satisfaction, pride, and fulfillment related to their efforts.

Taking on the work of a Superfund advisory group is no easy task. But the process of bringing together a group of diverse community members who share a common purpose can provide great benefits, both to your community and to yourselves as more engaged members of that community.

GLOSSARY

Words contained in this glossary are *italicized* on first reference in the text of this guidebook. Additional terms can be found in the EPA's [Superfund Glossary](#) – the source of some of the definitions listed below.

Advisory role: A primary function of a Superfund advisory group: to give local advice and recommendations to the Environmental Protection Agency (EPA). This role does not include the power to change federal policies or make decisions on clean-up and remediation.

Community Advisory Group (CAG): According to the [Superfund Community Advisory Groups web page](#): A group “made up of representatives of diverse community interests” designed to “provide a public forum for community members to present and discuss their needs and concerns related to the Superfund decision-making process.”

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA): Also known as the Superfund Act, CERCLA was passed by Congress in 1980 to remediate lands and waters contaminated by hazardous wastes, to identify responsible parties and hold them liable for contamination, and to establish the Superfund trust fund to pay for clean-up when the EPA cannot identify responsible parties. More information is available on the EPA's [CERCLA Overview web page](#).

Community: There are nearly infinite ways to define a community, and often there are multiple communities involved in a Superfund clean-up. This guidebook includes in its definition both *place-based communities* (for example: watersheds, neighborhoods, cities, and counties) and *communities of interest* (for example: ethnic groups, environmental groups, or business organizations such as chambers of commerce). Some stakeholder groups, such as Native American tribes, may encompass both types of communities.

Collaborative learning: A way of gathering information and sharing knowledge and expertise as a group to promote shared understanding.

Community Involvement Coordinator (CIC): The EPA staff member charged with involving communities in the Superfund clean-up process by creating a Community Involvement Plan specific to each Superfund site. This person is responsible for reaching out to community members through one-on-one interviews, public meetings, and outreach and informational campaigns. CICs also are the main point of contact for any advisory groups that form in the communities where they work.

Community member: Anyone who is part of a community, as defined earlier. Members of a community affected by a Superfund site are stakeholders in the clean-up of contamination at that site.

Contamination: For the purposes of Superfund, any substance that is hazardous to human or environmental health. Typically found in soils, groundwater, surface water (such as streams, lakes, ponds, etc.) or sediments. Many Superfund sites host more than one contaminant of concern.

Environmental Protection Agency (EPA): An agency of the U.S. federal government, created in 1970 to protect human and environmental health. The EPA enforces laws passed by Congress to prevent and regulate pollution; remediate contaminated lands and waters; and conserve energy. The agency administers the federal Superfund clean-up program as part of its duties.

Feasibility Study (FS): Investigation of a contaminated site to evaluate possible remedial actions, recommend the most cost-effective actions, and prepare a tentative design, cost estimate, and timeline for completion. An FS informs the final Record of Decision (ROD) for a site.

Goals: Smaller steps that move an advisory group toward its vision.

Interests: Needs, desires, concerns, and fears that lie behind a person's stated position or viewpoint. An example of a position is: "The EPA should clean up the contamination as quickly as possible." Examples of interests that may lie behind this position are: "We need jobs and economic redevelopment as quickly as possible," or "If clean-up takes too long, I'm afraid groundwater contamination will reach our wells."

Mission statement: A summary of an advisory group's vision and goals, sometimes called a statement of purpose.

National Priorities List (NPL): A list of sites that are known to be contaminated and have been prioritized for clean-up based on a ranking of hazards to human health and the environment. Sites listed on the NPL are known as Superfund sites. Sites may also go through the Superfund clean-up process if they have been proposed for listing on the NPL but have not been added to the list.

Project Manager: The EPA staff member in charge of investigation and remediation of contaminants at a Superfund site. Sometimes known as a Remedial Project Manager (RPM).

Record of Decision (ROD): An EPA document explaining which clean-up alternative or alternatives, among those detailed in the Feasibility Study, will be used to remedy contamination at a Superfund site.

Redevelopment: A way to provide economic and other public benefits, typically involving adding or upgrading infrastructure. Redevelopment at a Superfund site may include business, housing, recreation, and other uses.

Remedial action: Actual implementation of the clean-up alternative or alternatives listed in a Record of Decision, through contaminant removal, water treatment, construction, or other activities. Numerous remedial actions may be required to clean up a Superfund site.

Remedial Investigation (RI): Testing of a contaminated site meant to gather information necessary to: 1) determine the nature and extent of contamination; 2) establish criteria for clean-up; 3) identify potential remedial actions to be included in a Feasibility Study (FS); and 4) support analyses of potential remedial investigations in the FS.

Remediation: A remedy for contamination. Remediation may involve a number of remedial actions, such as removing contaminants, treating contaminants on site, or covering contaminated soils and leaving them in place.

Responsible party: Any individual, company, or government agency found to be fully or partially responsible for contamination at a Superfund site. Responsible parties may include site owners, managers, transporters, or waste generators. They are liable for the costs of clean-up under CERCLA. When the EPA is still investigating contamination liability, these parties are known as Potentially Responsible Parties (PRPs), and often EPA staff and advisory group members continue to use the term "PRPs" even after an individual or company has been found to be responsible.

Restoration: Efforts to return a place to a state of ecological, environmental, and cultural health. Restoration may include returning streams and rivers to their natural courses, planting trees and other vegetation, re-introducing native fish, installing natural features to prevent erosion, and other actions.

Superfund Amendments and Reauthorization Act (SARA): An amendment to CERCLA, passed by Congress in 1986, which made a number of changes to the Superfund law, including increasing the size of the Superfund trust fund and establishing Technical Assistance Grants. More information is available on the EPA's [SARA web page](#).

Stakeholder: Anyone who has a “stake” in the clean-up of contamination, including those who are interested in, affected by, or capable of affecting contamination or clean-up. Stakeholders may include those who live near contaminated areas, local and tribal governments, local business owners, environmental groups, schools, owners of contaminated properties, and responsible parties.

Stakeholder Interests Assessment: A report on stakeholders' interests, concerns, and priorities on a particular issue, as well as a way of fostering greater community involvement and inclusion. Based on in-depth interviews with representatives of all stakeholder groups. Also known as a Situation Assessment. More information on stakeholder interests assessments is available in [Appendix D](#).

Superfund: A federal program to clean up contaminated sites, created with the passage of CERCLA in 1980. Superfund initially included a trust fund for cleaning up sites where responsible parties could not be identified, were bankrupt, or otherwise could not be made to pay for contamination. A tax on chemical and petroleum industries supplied the fund, which stood at \$4 billion in 1995. Congress did not reauthorize the Superfund tax that year, and the trust fund ran out of money in 2003. Today Congress allocates general taxpayer funds to the Superfund trust fund. More information is available on the EPA's [What is Superfund? web page](#).

Technical Advisory Group, aka Technical Assistance Group (TAG): An advisory group that has received an EPA Technical Assistance Grant. TAGs operate in many of the same ways as CAGs, but they also are responsible for interpreting technical and scientific information for the community by hiring and working with an independent technical adviser or advisers. TAGs must be incorporated as nonprofit organizations to receive and manage Technical Assistance Grants, and they have more stringent requirements for their operations due to receiving federal government funding.

Technical Assistance Grant: EPA funding to allow community groups to hire an independent technical adviser who can interpret technical and scientific documents. Up to 20% of a Technical Assistance Grant can be used to hire a grant coordinator, and funds also may be used for incidental costs such as printing, office supplies, and capacity-building. Both Technical Assistance Grants and the groups that receive them may be referred to as TAGs, which can sometimes lead to confusion.

Vision: An over-arching plan for the future of a Superfund site and, sometimes, a larger community. Visions may be broad or specific. Ideally a vision is based on extensive input from community members.

APPENDIX A: RESEARCH METHODS

In conducting the research that went into this guidebook, my guiding question was: *“What are the most effective approaches and resources for working within the constraints of a Superfund advisory group to foster a successful, community-informed clean-up?”*

To answer this question in a way that would be helpful to advisory groups working within the federal Superfund process in their communities, I relied on lessons, insights, and advice from long-serving Superfund advisory groups, as well as my own experiences working with the Frenchtown Smurfit-Stone Community Advisory Group (Frenchtown CAG), in Frenchtown, Montana, during its first year. Adequately exploring and sharing these groups’ rich and diverse experiences required a qualitative research approach.

RESEARCH OVERVIEW

I based my research design on Sharlene Nagy Hesse-Biber’s⁶² recommendations for qualitative research, reflecting on my position as a researcher who believes that communities should have genuine opportunities to develop and influence solutions to environmental problems in their communities. I also considered the incredible complexity of individual experiences within the Superfund process. Every contaminated site and every community that goes through the Superfund remediation process is unique.

I did not want to predict the experiences of newer Community Advisory Groups (CAGs) and Technical Advisory Groups (TAGs) based on those of more experienced groups. Instead, I wanted to provide a source of “illumination, understanding, and extrapolation to similar situations” as described by Golafshani.⁶³ I also sought to facilitate collaborative learning among these diverse groups to allow them to serve as their own experts – processes described by Ellerbusch et al.⁶⁴ and Pretty and Ward.⁶⁵ Although a guidebook cannot replace face-to-face collaborative learning within communities described by these researchers, my hope is that this document can be a tool in that process.

In keeping with my goals, I collected data primarily through in-depth interviews, using principles laid out by Hesse-Biber.⁶⁶ I interviewed 16 advisory group leaders representing 5 CAGs and 10 TAGs in the Environmental Protection Agency’s (EPA’s) Region 8. I interviewed two leaders from one advisory group whose leadership had changed after several years and one leader from each of the other groups. I also spoke with four current and former Region 8 Community Involvement Coordinators (CICs), since these EPA staff work directly with Superfund advisory groups.

Additionally, my observations of the Frenchtown CAG over the course of its first 12 monthly meetings shaped my understanding and, to some extent, my interview questions. Interviewing a leader of the Vasquez Boulevard and I-70 (VB/I-70) CAG in Denver, Colorado – a group that, like the Frenchtown group, had been operating for less than a year – also influenced my understanding of the needs and experiences of newer advisory groups.

RESEARCH PARAMETERS

Based on academic research showing differences in the EPA's implementation of Superfund policies and processes among the ten EPA regions,⁶⁷ as well as my own experiences with the Superfund program in Montana, I focused my research within the agency's Region 8, which encompasses Montana, Colorado, North Dakota, South Dakota, Utah, and Wyoming. I also hoped that this attention to geography might increase the possibility of capturing experiences that relate specifically to the Intermountain West, which hosts its own mix of communities and of contaminated lands that often are the product of hard-rock mining and other natural resource extraction industries.

I used purposive sampling as described by Hesse-Biber⁶⁸ to set four criteria for selecting interview participants:

1. The definition of "leader." I used a loose definition of this term, requiring that the interview participant had been a part of the group in some way since it began, and that that person had served in a leadership role, whether official or unofficial. To find representative "leaders," I relied on recommendations from EPA staff and from other advisory group members, as well as the interview participants' own descriptions of their roles.
2. Duration of the group. Because I sought lessons and advice from advisory groups with a good deal of experience, I spoke only with leaders of groups that had existed for at least five years. Actual group duration ranged from five to 30 years. Eleven of the 15 groups I contacted had operated for 10 years or more, and most of the leaders I spoke with had been involved with contamination issues in their communities before they were part of a CAG or TAG.
3. Recent involvement. Wanting to capture information relevant to citizens considering forming a CAG or TAG today, I sought to interview leaders of groups that either were still working or had disbanded within the past five years. Only four of the groups I contacted had disbanded; the rest were all still functioning.

I initially identified 22 existing or recently disbanded Superfund advisory groups in 20 Region 8 communities – all in Colorado, Montana, and Utah. Four of these had existed for fewer than five years, and two were on Army and Air Force bases, respectively. This left me with six CAGs and 10 TAGs working on 14 sites in 14 communities. Montana's Libby Asbestos and Milltown Reservoir Sediments sites both hosted a CAG and a TAG simultaneously. Despite my best efforts, I was unable to reach one of the six CAGs that met my criteria, leaving me with a final sample of five CAGs and 10 TAGs.

Due to time and resource constraints, I was able to interview just one person from each advisory group, with the exception noted above, in which one group lacked one continuous leader. Even interviewing two or three members from every group likely would not have captured the diversity of experience within each group, and since I was unable to interview a larger sample, I chose breadth (a larger number of groups) over depth (a larger number of members within a smaller number of groups).

In selecting EPA staff to interview, I sought current Region 8 CICs who had worked with at least three advisory groups over the course of at least five years. Four people fit this description, and I was able to interview three of the four. In addition, several people recommended I speak with a former Region 8 CIC who had played a key role in developing the EPA's CAG guidance documents in the 1990s and had worked with advisory groups in more recent years. These four current and former CIC interview participants had worked with between three and seven advisory groups each over the course of eight to 16 years.

Due to a communication error on my part, I also interviewed a leader of the VB/I-70 CAG in Denver, which, as noted earlier in this section, had existed for less than a year. However, asking the same interview questions of this person gave me additional insights into the experiences and needs of newer advisory groups. While the VB/I-70 CAG clearly hadn't reached some of the stages that many older groups had, this group leader expressed many of the same needs and frustrations as those expressed by longer-serving CAG and TAG leaders.

My observations of the first 12 monthly meetings of the Frenchtown CAG also provided crucial context for this guidebook, as did interactions among CAG members outside of meetings. Throughout my time observing the Frenchtown CAG, I took detailed notes on not only what group members and community members said at meetings, but also how they reacted and responded to one another and to those outside the group. I also participated in numerous unofficial conversations with CAG members before, after, and in-between meetings.

As I mentioned in the Background section at the beginning of this guidebook, watching the Frenchtown CAG's formation and earliest efforts prompted me to take on this project in the first place. Along with my review of existing academic research on CAGs, TAGs, and other government-sponsored advisory groups, the Frenchtown CAG's successes and struggles in its first year helped to inform my interview questions as well as, to some extent, my overall research perspective.

Beginning in January 2018, I conducted an assessment of stakeholder interests for the group as part of my practicum in Natural Resources Conflict Resolution at the University of Montana. Based on interviews with 29 community members who had a stake in the clean-up of the former Smurfit-Stone Mill Site, again using an interview guide with set, open-ended questions (included in [Appendix D](#)), the assessment addressed these goals:

1. Increase understanding of stakeholder interests, concerns, and priorities.
2. Encourage and support community input in the site clean-up.
3. Inform the CAG's mission, goals, and priorities.
4. Provide a foundation for developing a common vision for the future of the former Smurfit-Stone Mill Site, if the CAG chooses to pursue this path.

Since I worked on the Frenchtown Stakeholder Interests Assessment and this guidebook simultaneously, the two projects inevitably influenced each other, as well as my understanding of each project. I included a preliminary analysis of data collected for this guidebook within a section of the assessment entitled, "Lessons Learned from Other Advisory Groups." At the same time, the insights I gained from interviewing stakeholders in the former Smurfit-Stone Mill Site clean-up – some of whom were Frenchtown CAG members, most of whom were not – gave me additional perspective on the needs of a specific community and the role of a Superfund advisory group within that community.

In some cases – particularly in the Outreach and Education section of [Chapter 5](#) – I included information from stakeholders I interviewed for the Frenchtown Stakeholder Interests Assessment. In others – notably the Facilitation and Making Decisions sections of [Chapter 1](#) – I drew on my studies in natural resources conflict resolution, including some of the research in this field, in addition to my own research.

DATA COLLECTION

The 16 interviews I conducted with long-serving CAG and TAG leaders each lasted between 35 minutes and 144 minutes, with a median duration of 79 minutes. Most interviews were in the 60- to 90-minute range. Due to long distances among sites throughout Montana, Colorado, and Utah, all interviews happened over the phone, with the exception of one in-person interview with a leader of the nearby Milltown Redevelopment Working Group. I recorded all interviews after receiving permission from participants.

I used the same set of open-ended questions for each interview participant, with minor modifications of question wording for groups that were still working vs. groups that had disbanded. I designed interview questions to elicit a broad range of responses consistent with individual experiences, and, for the most part, I asked follow-up questions as appropriate to clarify my understanding of participants' answers and to prompt additional or more in-depth responses. Interview questions focused on themes found in existing academic research, as well as areas where I had seen the Frenchtown Smurfit-Stone CAG struggle. Questions I asked advisory group leaders focused on:

- How their groups formed.
- Whether and how groups developed goals and common visions.
- Community representation within their groups.
- Whether and how they kept members engaged long-term.
- How their groups made decisions.
- Whether and how group members established trust and learned together.
- Their groups' relationships with EPA staff and parties responsible for contamination.
- Successes and struggles their groups had experienced.
- What advice they might give to newer advisory groups.

Four of the first seven interview participants spoke at length about their groups' relationships with responsible parties, which prompted me to add two questions on this subject to my interview guide. This required me to call back the other three initial interview participants to seek their responses on this matter as well. I was only able to get back in touch with two of the three, so I lacked data on this subject for one of the 15 advisory groups represented in my research.

CIC interviews lasted between 26 minutes and 71 minutes. All of these interviews occurred over the phone. I used a different set of open-ended interview questions for CICs, using the same questions for each CIC interview participant. As with CAG and TAG leader interviews, in most cases I asked follow-up questions of CICs where appropriate or necessary for full understanding. I recorded all interviews after receiving permission from participants. Questions I asked CICs focused on:

- Advice they offer to new CAGs and TAGs.
- Elements needed for advisory group success, including specific examples from groups they'd worked with.
- Struggles they'd seen groups encounter, including specific examples.
- Whether and how developing a common vision was helpful to advisory groups.
- Relationships among advisory groups, EPA staff, and responsible parties.

DATA ANALYSIS

To analyze the data from all 21 interviews (16 longstanding CAG and TAG leaders, one new CAG leader, and four CICs), I first paid someone to transcribe all audio recordings. I then analyzed my first six advisory group interview transcripts in detail before reflecting on potential themes and categories of experience to include in this guidebook. From there, I went back and forth between analyzing interviews – using both open-ended coding and focused coding techniques laid out by Hesse-Biber⁶⁹ – and reflecting on common themes and experiences, as well as outlier data from group leaders who had different experiences.

I also analyzed CIC interview transcripts in a more focused way, paying attention to the differences in perspective that often emerged there, though many of the general themes in these interviews were consistent with those in the advisory group leader interviews. Since I conducted CIC interviews after finishing my advisory group leader interviews, my interpretation of this data likely was influenced more by advisory group interviews than the other way around.

The themes that emerged from the interview data became the topics of this guidebook. While there were many consistencies in the strategies used by groups that reported significant successes, different experiences among groups required me to incorporate variations as well. Examples of this included the various ways groups chose their members and made decisions, as well as the fact that most groups did not form a common vision.

As a result, when writing this guidebook I generally did not rank or otherwise distinguish lessons learned by large numbers of interview participants vs. just one or a few. Rather, I focused on strategies, approaches, and resources that worked well for those who used them. I included specific experiences and advice in this guidebook when I noticed one or more of the following:

- Interview participants reported that these items worked well for the groups with which they worked.
- Interview participants whose groups used particular strategies, approaches, and resources described their efforts as generally successful, useful, or fulfilling.
- Interview participants stressed particular strategies, approaches, or resources, either in my specific question about what advice they would give to newer groups, or elsewhere in the interview.

I took this approach partly because the non-academic audience most likely to read this guidebook probably is not interested in reports of how many interview participants had a similar experience or endorsed a certain approach. Mostly, however, I did this in recognition of the unique experiences of each advisory group. What worked well for 12 or even 15 groups may not necessarily work well for one specific group, while a strategy or resource used successfully by just one group may be exactly what another group needs.

After I had written most of this guide, I went back through the interviews to find quotes that represented the varied experiences and perspectives of interview participants within each theme. I then added quotes to bring key concepts to life and to create a better sense of the real-life situations behind the recommendations in this guide. I did my best to choose quotes that were representative of the recommendations, as well as some that reflected alternative strategies or perspectives. When

presenting alternative views – whether through quotes or overall recommendations – I made sure to present them as such in the text of this guide.

LIMITATIONS OF MY RESEARCH

A primary weakness of my research for this guidebook lies in the very nature of my research question. Superfund sites and the communities and advisory groups they impact vary widely on an almost infinite number of parameters. For this reason, it is inherently difficult to derive a common set of effective approaches and resources for a guidebook aimed at numerous other, also vastly different, advisory groups. Yet commonalities did exist, and varied individual experiences also may be useful, either to specific groups or simply in terms of providing a wide array of possibilities for navigating the Superfund advisory process.

Another major limitation of this endeavor was the apparent lack of diversity among the advisory groups who were at the center of my research. With two exceptions, all the groups I contacted emerged from small- to medium-sized mountain towns. The exceptions were the Lowry Landfill Community Advisory Group, based in Aurora, Colorado, a city of about 362,000 people, and FRIENDS of Great Salt Lake, a nonprofit TAG recipient based in Salt Lake City. Through questions I asked about groups' membership and representation, I did not get the impression that they were very diverse in terms of different racial, ethnic, or socioeconomic populations in their communities. These factors are important to note, since environmental justice research has found that communities of color and those with lower income levels are more likely to have hazardous wastes disposed of in their communities.^{70,71} Notably, the Frenchtown Smurfit-Stone CAG is diverse in terms of its representation of the community's ethnic and tribal background, but I did not interview anyone from the Frenchtown CAG specifically for this guidebook, and the group still represents a small mountain town.

My choice to interview only CAG and TAG leaders rather than including multiple group members may be seen as a limitation as well. Although leaders are often assumed to represent an entire group, this is often not the case. As I learned through the Stakeholder Interests Assessment in Frenchtown, a wide range of interests, views, and concerns may exist outside the leadership of a "representative" group, as well as within a single, supposedly homogenous stakeholder group. Asking one person to speak for many may be a nearly impossible request. It was also impossible for me as an interviewer to assess, based on one phone interview, the extent to which individual leaders did or did not speak for the rest of their advisory groups, whose interactions I was unable to observe. CIC interviews and my observations of the Frenchtown CAG did help to broaden my perspective in this regard, however.

The limited number and scope of interviews I conducted may also be seen as problematic. This guidebook would certainly have been more comprehensive if I had been able to interview five or six members from each advisory group, as well as a larger number of CICs. Future research could benefit from a focus on the perspectives of others who work with CAGs and TAGs, including EPA Superfund Project Managers; independent technical advisers and facilitators; responsible parties; and representatives of state agencies that work with the EPA on federal Superfund clean-ups.

APPENDIX B: ADVISORY GROUPS INTERVIEWED

Below is a list of all 15 of the long-serving Community Advisory Groups (CAGs) and Technical Advisory Groups (TAGs) whose leaders I spoke with for this guidebook. I spoke with one leader from 14 of the groups, and two leaders from one of the groups. Included with each group's name are:

- A brief description of the Superfund site the group is or was working on, including a link to the EPA web page for that site.
- A link to the advisory group's website, if the group has one. In some cases where groups didn't have their own websites, I included the website of a group with which they are affiliated. For one group that didn't have its own website, I included a link to a Colorado Department of Public Health and Environment web page that has information about the group.
- Copies of the group's mission statement, statement of purpose, overarching goal, or similar statement.

**Note that the order of advisory groups listed here does not correspond to the numbers assigned to group leaders for quotes used earlier in this guidebook.*

COMMUNITY ADVISORY GROUPS

Lincoln Park Cotter Superfund Community Advisory Board

Canon City, Colorado

[Lincoln Park Superfund Site](#): The 2,600-acre site includes a former uranium processing mill as well as the nearby Lincoln Park neighborhood. Radioactive materials including uranium, vanadium, and molybdenum have contaminated soils, surface water and sediments in Sand Creek, and groundwater formerly used by Lincoln Park residents.

[Mission Statement](#): The CAG's mission statement is to assemble a representative body of concerned community members, regulators and Cotter representatives in an innovative environment designed to facilitate an exchange of ideas to ensure efficient clean-up that is protective of human health and the environment.

[Goal of the CAG](#): The overarching goal of the CAG is to obtain the best possible clean-up of the Cotter/Lincoln Park Superfund Site for our community.

Libby Community Advisory Group

Libby, Montana

[Libby Asbestos Site](#): Highly toxic tremolite-asbestos, also known as Libby Amphibole asbestos (LA), has been found throughout the town of Libby, including in homes, schools, and parks, due to the use of vermiculite insulation and vermiculite mining operations at the former Libby Mine.

May be reached via the [Libby Area Technical Assistance Group website](#)

[Statement of Purpose](#): The Libby CAG's purpose is two-fold: to provide a conduit for formal and regular communication between the people of the Libby community and EPA and to provide advice and/or recommendations to EPA and others such as MT congressional delegation.

In 2004 and 2005, the CAG added three additional items to its purpose: facilitating the creation of new organizations as needed; causing the release of information; and serving as a point of contact with Lincoln County for Montana's Governor and others.

Lowry Landfill Community Advisory Group

Aurora, Colorado

Lowry Landfill: Liquid and solid wastes – including about 138 million gallons of industrial wastes – were disposed of in unlined pits beginning in the 1960s and have since contaminated soil, groundwater, surface water and sediments with hazardous chemicals. Contaminants include pesticides, industrial solvents, sewage sludge, and small amounts of radioactive materials.

[Lowry Landfill Community Advisory Group Website](#)

The Lowry CAG does not have a mission statement or statement of purpose, but an addendum to the group’s operating procedures states: The common goal of all CAG participants is the protection of human health and the environment.

Milltown Redevelopment Working Group

Milltown and Bonner, Montana

Milltown Reservoir Sediments: Part of the larger Clark Fork River Superfund Complex, the reservoir contained about 6.6 million cubic yards of sediments contaminated by arsenic and heavy metals from upstream mining activity. These mining-related wastes contaminated sediment, surface water, and groundwater behind the dam, which was removed in 2008.

The CAG has disbanded, but members may be reached via the [Friends of 2 Rivers](#) website.

Working Group Charter: The Milltown Superfund Site Working Group brings together diverse interests and expertise from local and neighboring communities. The group will evaluate how EPA’s Milltown clean-up plan can be implemented and supplemented to best benefit the public. Through a collaborative process, the group will create and recommend a redevelopment plan to Missoula County that strongly reflects local preferences and is compatible with the site remedy and restoration. The redevelopment plan may include, but need not be limited to recreational, environmental, economic, historic and infrastructure developments.

Willow Creek Reclamation Committee

Creede, Colorado

Nelson Tunnel/Commodore Waste Rock Pile: The abandoned Commodore Mine Complex includes the Nelson Tunnel, which discharges acid mine drainage into West Willow Creek, as well as a waste rock pile that has released elevated levels of arsenic, cadmium, lead, manganese and zinc into the creek.

[Willow Creek Reclamation Committee Website](#)

Mission Statement: The WCRC mission is to improve water quality and habitat, reduce flood risks, reclaim areas impacted by mining, and preserve historic structures in the Willow Creek watershed in ways that are practical, cost effective, and beneficial to the economic sustainability of the Creede community.

TECHNICAL ADVISORY GROUPS

Arrowhead Foundation, Inc.

Anaconda, Montana

Anaconda Co. Smelter: Historic processing and smelting of copper ore produced high concentrations of arsenic, lead, copper, cadmium, and zinc that have contaminated soil, groundwater and surface water in a 300-square-mile area.

Arrowhead Foundation Website

Mission Statement: The Arrowhead Foundation has been working for 30 years to ensure that the community is informed and up to date on Superfund issues. It is our mission to interpret information for the public, make it accessible and insure that at times of remediation decision the community is informed and involved.

Black Eagle Civic Club Technical Advisory Committee (BETAC)

Black Eagle, Montana

ACM Smelter and Refinery: Historic processing and smelting of zinc and copper ore produced high concentrations of copper, zinc, arsenic and cadmium that have contaminated soil, groundwater, surface water, and sediments in the Missouri River. The contaminated area encompasses not only the 427-acre former smelter and refinery site, but also the unincorporated community of Black Eagle and portions of the Missouri River.

BETAC does not have a mission statement

Citizens' Technical Environmental Committee (CTEC)

Butte, Montana

Silver Bow Creek/Butte Area: Mining wastes, including arsenic, cadmium, copper, lead, mercury, zinc, and other toxins, have been found throughout the Butte area, including in residential soils, streamside tailings, groundwater in the Berkeley open-pit mine and elsewhere, and the Clark Fork River for 120 miles downstream.

Montana Pole and Treating: A former wood-treatment facility contaminated soils, groundwater, surface water, and sediments with hazardous chemicals, including pentachlorophenol (PCP) and creosote.

Butte CTEC Website

Mission Statement: The mission of CTEC is to help people living in the Butte-Silver Bow Creek area understand and respond to complex technical information related to the area's environmental problems, in order to enable them to participate in a meaningful manner in local, state, federal and industrial deliberations regarding solutions to these problems.

CTEC's vision is of a clean and healthy environment in Butte achieved through an informed and engaged citizenry and public servants.

Clark Fork River Technical Assistance Committee (CFRTAC)

Silver Bow, Deer Lodge, and Missoula Counties, Montana

The Clark Fork River Superfund Complex, including Milltown Reservoir Sediments: Approximately 120 miles of the Upper Clark Fork River have been contaminated by arsenic, cadmium, copper, lead, mercury, zinc, and other toxins resulting from mining activities in and around the towns of Butte and Anaconda. These mining-related wastes have contaminated sediment, surface water, and groundwater from the Clark Fork's headwaters at Silver Bow Creek to the Milltown Dam, which was removed in 2008.

CFRTAC Website

Mission Statement: CFRTAC is a volunteer citizens' organization whose mission is to help residents make informed choices and participate in the Superfund remediation, restoration and redevelopment of the Clark Fork River and its affected communities from Butte to Missoula.

Eagle Mine Limited (EML)

Part of the Eagle River Watershed Council (ERWC)

Minturn, Colorado

Eagle Mine: Former gold, silver, zinc, and copper mine covering 235 acres. Heavy metals, including arsenic, cadmium, lead, and zinc have contaminated soils, sediments, surface water, and groundwater.

[EML Website](#)

[ERWC Website](#)

Mission Statement:

The mission of EML is to:

- Develop technical information about the Eagle Mine Site and the Water Quality of the Eagle River into a format more readily accessible to the people of Eagle County and the State of Colorado
- Present that information in public meetings and through this website
- Facilitate public input in decisions being made by State and Federal agencies in cooperation with local governmental entities.

FRIENDS of Great Salt Lake

Tooele County, Utah

U.S. Magnesium: The 4,525-acre site along the southwest shore of the Great Salt Lake includes the still-operating U.S. Magnesium facility as well as surrounding waste disposal areas. Contaminants include heavy metals, acidic wastewater, polychlorinated biphenyls (PCBs), dioxins, furans, and polycyclic aromatic hydrocarbons (PAHs), which have been released into the air, soil, surface water, and groundwater.

[FRIENDS of Great Salt Lake US Magnesium website.](#)

FRIENDS Mission Statement:⁷² The mission of FRIENDS of Great Salt Lake is to preserve and protect the Great Salt Lake Ecosystem and to increase public awareness and appreciation of the Lake through education, research, advocacy, and the arts.

Lefthand Creek TAG Coalition

Part of the Lefthand Watershed Oversight Group

Ward, Colorado

Captain Jack Mill-Lefthand Canyon: Lead, arsenic, thallium, zinc, manganese, copper, magnesium, and other heavy metals released by gold and silver mining near have contaminated groundwater, surface water, and sediments in Lefthand Creek, which provides drinking water to about 15,000 people.

[Lefthand Watershed Oversight Group Website](#)

Mission Statement: The purpose of the Lefthand Creek TAG Coalition is to use United States Environmental Protection Agency's Technical Assistance Grants (TAGs) to assess and protect the quality of water in Lefthand Creek; to serve as a hub of communication about abandoned mine clean-up efforts; to foster positive relationships between citizens and the state and federal government, and to educate the community about environmental and health issues concerning Lefthand Creek and/or the clean-up of abandoned mine sites.

Libby Area Technical Assistance Group (LATAG)

Libby, Montana

[Libby Asbestos Site](#): Highly toxic tremolite-asbestos, also known as Libby Amphibole asbestos (LA), has been found throughout the town of Libby, including in homes, schools, and parks, due to the use of vermiculite insulation and vermiculite mining operations at the former Libby Mine

[LATAG Website](#)

[Mission statement](#): Libby Area Technical Assistant Group's (LATAG) mission is to ensure that the cleanup of Libby Amphibole contamination is completed in a comprehensive, complete and timely manner, ultimately resulting in the elimination of the asbestos threat to Libby community members.

Standard Mine Technical Advisory Group (SMTAG)

Part of the Coal Creek Watershed Coalition

Crested Butte, Colorado

[Standard Mine](#): Heavy metals from historic silver mining have contaminated soils, surface water, and groundwater in Elk Creek, which flows into Coal Creek, the source of Crested Butte's drinking water.

[SMTAG Website](#)

[Mission Statement](#): The mission of the SMTAG is to assure that Standard Mine clean-up activities and the final outcome of the clean-up process are beneficial to the environment and to affected persons and communities; to assess and protect the quality of water in Elk Creek and Coal Creek; to serve as a hub of communication about abandoned mine cleanup efforts; to help foster positive relationships between citizens and the state and federal government; and to educate the community about environmental and health issues concerning Elk Creek, and Coal Creek and/or the cleanup of abandoned mine sites.

Superior Technical Assistance Committee

Superior, Montana

[Flat Creek Iron Mountain Mine and Mill \(IMMK\)](#): Lead, arsenic, antimony, cadmium, and manganese from historic hard rock mining up Flat Creek contaminated soil, surface water, sediments, and groundwater, including Superior's drinking water supply and residential soils.

[Mission Statement](#): The Superior Technical Assistance Committee will provide the Communication, Cooperation, and Coordination needed to achieve a successful EPA Clean-up and Restoration and to make our Community a Healthier and Safer place to live.

APPENDIX C: RESOURCE LIST

There is a huge array of websites, publications, and organizations that may be of use to your advisory group. Those I've included here all fall roughly within the following categories:

- Information about Superfund
- Meetings and Decision-Making
- Community Outreach, Education, and Assessment
- Technical Assistance Resources
- Watershed Protection

INFORMATION ABOUT SUPERFUND

Superfund Community Involvement Handbook. 2016.

<https://semspub.epa.gov/work/HQ/100000070.pdf>. This guide is intended for EPA staff but has excellent information about steps in the Superfund process and how communities can become involved at each step. It also has a list of common Superfund acronyms.

This is Superfund: A Community Guide to EPA's Superfund Program.

<https://semspub.epa.gov/work/HQ/175197.pdf>.

This brochure provides a simplified explanation of the Superfund process for communities. EPA-540-R-11-021

"Superfund Cleanup Process."

<https://www.epa.gov/superfund/superfund-cleanup-process>. Another simplified explanation of Superfund cleanups, focusing on the main steps in the process and what each involves.

"Superfund Glossary."

<https://www.epa.gov/superfund/superfund-glossary>.

"Superfund Community Advisory Groups."

<https://www.epa.gov/superfund/superfund-community-advisory-groups>.

"Superfund Training and Learning Center."

<https://www.epa.gov/superfund/superfund-training-and-learning-center>. This website provides links to hundreds of courses and trainings, via webinars, videos, online courses, and other resources. Most are aimed at a

Strategies:

Finding more EPA publications

EPA publications listed in this appendix, as well as many more, are available free through the [National Service Center for Environmental Publications](#). Here you can download PDF documents and order books with no shipping or other charges.

Using the [simple search tool](#), you may search for publications using their "EPA" number, typically listed at the top of the document, but sometimes at the bottom. Enter this number into the "Search Publications" box, minus the letters "EPA" and minus any dashes. For example, search for document EPA 540-F-05-010 by typing "540F05010" into the search box. You can also search by title for documents that do not have "EPA" numbers, or by subject or keyword.

Source: *National Service Center for Environmental Publications, Environmental Protection Agency.*

<https://www.epa.gov/nscep/how-search-publications-using-simple-search>.

technical or professional audience and may not be helpful to the average advisory group member. However, they may be useful to members with more technical or scientific backgrounds. Some trainings are aimed at a general audience.

MEETINGS AND DECISION-MAKING

Managing Effective Meetings. 2003. Public Policy Research Institute and Consensus Building Institute. <http://naturalresourcespolicy.org/docs/collaboration-conflict-resolution/managing-effective-meetings.pdf>

“Consensus Decision-Making: A Virtual Learning Center for People Interested in Consensus.” <https://www.consensusdecisionmaking.org/>

“Consensus Decision Making.” Seeds for Change. <https://www.seedsforchange.org.uk/consensus#conditions>.

The Center for Natural Resources & Environmental Policy (CNREP) provides additional resources on its [Collaboration & Conflict Resolution web page](#). These include links to professional associations and government agencies involved in natural resource collaboration and consensus-building, as well as best practices and selected guidebooks.

COMMUNITY OUTREACH, EDUCATION, AND ASSESSMENT

“Superfund Community Involvement Tools and Resources.” <https://www.epa.gov/superfund/superfund-community-involvement-tools-and-resources#main-content>. Aimed at EPA staff but potentially useful to advisory groups as well. The Community Involvement Toolkit Documents listed at the bottom of the page include numerous public outreach, education, and engagement tools, including brochures on:

- [Planning for site reuse and redevelopment](#)
- [Developing communications strategies](#)
- [Creating easy-to-understand fact sheets](#)

Community Culture and the Environment: A Guide to Understanding a Sense of Place. 2002. EPA 842-B-01-003. This book provides information, activities, and assessments for better understanding and working within your community’s unique culture – or cultures – in the context of environmental issues. You can order this book from the [National Service Center for Environmental Publications](#), free of charge.

Civic Engagement: A Guide for Communities. 2006. <http://naturalresourcespolicy.org/docs/collaboration-conflict-resolution/civic-engagement.pdf>. A guide for increasing and improving engagement in issues of concern to your community. Also includes additional resources on conflict resolution, consensus building, civic organizing, and cross-cultural communication.

TECHNICAL ASSISTANCE RESOURCES

Technical Assistance Needs Assessment. <https://semspub.epa.gov/work/HQ/100000144.pdf>. This brochure is aimed at Community Involvement Coordinators who are deciding whether a community will need a technical adviser or other technical assistance.

“Technical Assistance Grant Program.” <https://www.epa.gov/superfund/technical-assistance-grant-tag-program>.

“Technical Assistance Services to Communities Program.” <https://www.epa.gov/superfund/technical-assistance-services-communities-tasc-program>. Provides information on how to get an EPA-funded independent technical adviser without applying for a Technical Assistance Grant.

“Partners in Technical Assistance Program.” <https://www.epa.gov/superfund/partners-technical-assistance-program-ptap>. Information on an EPA-sponsored program to link advisory groups to selected colleges and universities for assistance with information, education, technical assistance, conflict resolution, or capacity-building. Only schools that have received grants from the National Institute for Environmental Health Sciences Superfund Research Program grants may work through PTAP.

Superfund Technical Assistance Grants. 1993.
<https://nepis.epa.gov/Exe/ZyPDF.cgi/10001X33.PDF?Dockey=10001X33.PDF>. EPA 540-K-93-001.

Technical Assistance Grant (TAG) Program: Fact Sheet. 2003.
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Technical Assistance Grant (TAG) Program: Managing Your TAG. 2003.
<https://nepis.epa.gov/Exe/ZyPDF.cgi/P100PGXS.PDF?Dockey=P100PGXS.PDF>. EPA 540-R-01-11.

Technical Assistance Grants (TAG): How to Find and Select a Technical Advisor. 2005.
<https://nepis.epa.gov/Exe/ZyPDF.cgi/P100A0UE.PDF?Dockey=P100A0UE.PDF>. EPA 540-F-05-010.

WATERSHED PROTECTION

River Network. <https://www.rivernetwork.org/events-learning/resources/>. The River Network links local organizations working to protect rivers and water quality nationwide. The organization provides publications, tools, templates, and webinars free to the public, as well as additional resources to its members. Manuals, templates, webinars, and other tools are available on the River Network’s [Resources page](#).

The Clean Water Act Owner’s Manual. River Network. <https://www.rivernetwork.org/product/the-clean-water-act-owners-manual/>. This manual costs \$5 and was highly recommended by one TAG leader.

Tools for Protecting Your River. Prairie Rivers Network. <https://www.rivernetwork.org/wp-content/uploads/2015/10/watershedtoolkit.pdf>. Information on organizing a river protection or restoration group.

APPENDIX D: STAKEHOLDER INTERESTS ASSESSMENTS

A Stakeholder Interests Assessment (SIA) is an exploration of stakeholders' interests, concerns, and priorities, commonly used to gain a better understanding of community needs around a specific issue, such as contamination or Superfund clean-up. Advisory groups also can use an SIA to learn more about how community members wish to be involved in the clean-up conversation – information that can foster greater inclusion and community input.

More commonly known as a Situation Assessment, an SIA is based on confidential, in-depth interviews using open-ended questions to allow stakeholders to express their interests as fully as possible. An SIA details findings from the interviews in a neutral way that does not rank or prioritize ideas but simply lays out all the interests represented by interview participants. An assessment may also recommend options for moving forward, based on interview findings. Examples of non-Superfund-related Situation Assessments are available through the University of Montana's [Center for Natural Resources & Environmental Policy](#).

Only someone who is a neutral, independent party and who CAG and community members trust should conduct an assessment for your group. Your facilitator is likely the best person for the job. Colleges and universities may also fill this role if students or faculty have expertise in this area. Whoever does your SIA should do so in close coordination with your group to ensure they are reaching representatives of all stakeholder groups and asking questions that will be beneficial to your work.

Benefits of an SIA may include:

- Increased understanding of stakeholders' concerns.
- Identification of stakeholders who are not represented on your advisory group.
- Encouraging community input in a Superfund clean-up as well as your advisory group's work.
- Informing your advisory group's goals and priorities.
- Laying the groundwork for a common vision for the Superfund site and the larger community.

SIA questions should be tailored to your group and your community. They may include anything you wish to know about Superfund-related interests and concerns. As an example, here are the questions I asked of stakeholders in the Frenchtown Smurfit-Stone Mill Site clean-up for the Frenchtown CAG SIA:

1. In what ways, if any, is the Mill Site important to you?
2. What are your interests in the Mill Site clean-up?
3. What would a successful clean-up of the Mill Site look like to you?
4. What do you think is a reasonable amount of time for a successful clean-up to take place?
5. What is your biggest concern about the Mill Site clean-up?
 - What other concerns do you have about the site clean-up?
6. What benefits do you think the Mill Site might provide for the community in the future?
7. What kind of development do you think might provide those benefits?
8. How are you currently receiving information about the Mill Site?
9. Is this the best way for you to receive information?
 - If not, what would be the best way to provide information to you?
10. Is the information you're receiving about the Mill Site easy to understand? Why or why not?

11. Do you think there are stakeholders in the community who are not having their concerns addressed?
 - If so, who could I speak with to learn of these stakeholders' needs?
12. Is there anything else you would like to share about the Mill Site that we haven't already touched on?

More examples of questions you might use in your own SIA are available in the EPA's [Community Interviews Tool](#). Although these questions are generally intended for Community Involvement Coordinators to ask when creating a Community Involvement Plan or Technical Assistance Needs Assessment, many are appropriate for an independent SIA as well.

Other types of assessments that rely on in-depth interviews also may be useful to your group. Examples include:

- Needs Assessments, which can help determine what resources your advisory group is lacking and how you might fill those needs.
- Community Visioning assessments, which focus on how community members envision the future of a Superfund site, or their community as a whole, and how Superfund clean-up might affect their visions.
- Technical Assistance Needs Assessments, which EPA Community Involvement Coordinators may use to help determine whether a community needs assistance with technical information, and, if so, what types of technical assistance might be most useful.

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