

Public Participation in 201 Projects

A Review in Regions I, III, V, VI and IX

Facility Requirements Branch
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for
2000

RECOMMENDATIONS AND CONCLUSIONS

The result of a survey of public participation in five regions indicates that a strong commitment by EPA regional personnel, the water division director, and the regional administrator in each region exists towards public participation. EPA personnel are far ahead of most grantees and States in encouraging public participation in the 201 program.

It has been found in all regions that public participation in 201 projects often provides for:

1. A better public facility plan;
2. A less costly project;
3. Improvements in the environmental quality of the project;
4. A review of more alternatives, especially small systems and land application;
5. A better job by the consulting engineer;
6. A more detailed facility plan;
7. A better review of environmental impacts.

The development of citizen participation has been an evolutionary process for both the grantee and EPA. The first 201 projects had virtually no public participation, except for the public hearing that was required at the end of a facility plan. At that time objections were noted and the project proceeded. While this process is still evident in many communities, EPA is no longer allowing communities to disregard opposition to a project or public scrutiny. All regions are now requiring the grantees to openly discuss costs of projects and have the public involved prior to the time when decisions are made. Some regions require applicants to discuss public participation in the initial Plan of Study and show when the public can participate in facilities planning. All regions agree that the regulations governing public participation should either be amended or clarified through a PRM to require:

1. A public participation plan in the Plan of Study or a plan for public participation at about the ten percent completion phase;
2. Public meetings or workshops soon after a Step 1 grant has been made;

3. Public participation in the planning process before an alternative has been chosen;
4. Better advertisement than a legal notice, containing information on anticipated costs and proposed workshops, meetings, hearings, agendas and availability of reports.

As experience with 201 projects progressed, public participation was found to be an extremely useful tool in assessing, at an early date, whether the project was controversial. This enabled many regions to make an early decision on whether an environmental impact statement was necessary, and often saved time in getting a project underway as the piggyback method was used. In some instances, controversies were arbitrated through public participation, which allowed the project to go ahead more smoothly. As a result of public participation some projects that were controversial at the start did not need an EIS.

In several projects where the boundary of 208 and 201 projects were similar, the public participation program was merged effectively. This works only in limited areas and for limited projects.

Regions interpret eligibility for public participation differently, and it would help all regions if eligibility for public participation was clarified. It is recommended that a policy statement be issued which would indicate that public participation is eligible for EPA funding through Step 3. Special mention should include newspaper, advertising, newsletters, radio, and other advertising; staffing citizen advisory committees, and a grantee's public relations staff.

Public participation should be continued beyond Step 1 so that an effective forum for public input exists. A project may indicate no opposition through the Step 1 and Step 2 processes, then generate opposition when the Step 3 construction project is awarded. At that time, the region will have to decide whether an Environmental Impact Statement should be written and if Step 1 should be revised--a long and costly delay. Other experiences indicate that in building the treatment works, there should be public participation when it is necessary to phase wastewater treatment works and inform the public about construction, street closures, and other effects of the 201 program.

The addition of a public involvement professional at the regional level to assist project officers, applicants and their engineers in the 201 program is deemed an absolute necessity. Region V has such a person; their experience with the staff position of a public involvement professional is extremely favorable.

A public involvement professional has expertise in the use of the communications media and public participation, and that person has the knowledge which provides for an effective two-way forum to discuss controversies, alternatives, environmental issues, costs and other construction grant program issues. Such a person needs experience and training in working with the communications media and should have some knowledge in dealing with civic action programs. Such a person should also train project officers in public participation.

A major shortcoming of the 201 program is the inability of project officers to meet with the grantees and to attend public meetings. There is a vast amount of misrepresentation of EPA programs by local engineers, local officials, consulting engineers, and city attorneys at public hearings, due to misunderstanding of EPA programs. For example, in an Indiana project, a city attorney moderated a public hearing and stated that EPA was not interested in costs, then threw out all questions on costs as irrelevant. In a public hearing in another Indiana project a local engineer refused to discuss small systems, stating that only a treatment facility and long interceptor sewers would be permitted by EPA and the State. In Illinois there were a number of engineers that told small communities that they had to have a sewage treatment plant with collection sewers in order to comply with EPA regulations. In that case the State had to put a moratorium on acceptance of small systems for placement on the priority list. Some public participation functions may be delegated to States, which may require EPA to establish public participation strategies on its 201 program.

Travel money for EPA staff would be an investment that would pay extensive dividends both in catching problems early and in making EPA policy known to potential grantees regarding small systems, costs, and environmental considerations. In the case of Region V, there is a fear that if travel for water division staff continues at the present rate, there will be no travel money after July.

There is a need for a national public relations program to tie together regional and local programs with a unifying theme. Such a program would help stimulate participation on the local level through public information on EPA's public participation programs. A comparable program is Interior's "Smokey the Bear" fire prevention program. EPA would let the nation know that it is trying to clean the nation's water and that individuals can do something within their communities to bring this about through public participation in the 201 program.

The dollar commitment in public participation is not necessarily a measure of good public participation. Some communities used minimal funds, but had good public participation, while others used large sums and had poor public participation. The resourcefulness of the involved officials and engineers plays a much greater role than dollars committed.

PUBLIC PARTICIPATION SURVEY SUMMARY

Communities Surveyed

| | |
|------------|-----------|
| Region I | 11 |
| Region III | 6 |
| Region V | 30 |
| Region VI | 4 |
| Region IX | <u>10</u> |

Total Number of Projects 61

Public Participation Effort Made 26

Effect of Public Participation

| | |
|----------------------------------|----|
| No Effect | 15 |
| Increased Total Cost | 1 |
| Decreased Total Cost | 16 |
| Improved Environmental Quality | 17 |
| Hurt Environmental Quality | 0 |
| Relocated Sewage Treatment Plant | 4 |
| Relocated Sewers | 3 |

Public Hearing

Publicized Beyond Legal Requirements 27
Issues Raised 23

Effect

| | |
|------------------------------------|----|
| No Effect | 18 |
| Changes suggested, changes made | 19 |
| Changes suggested, no changes made | 3 |

Assistance to Public

Staff 15
Consultant 17

Note: A project may have had more than one answer. For example, a project may have, through public participation, decreased total costs, improved environmental quality, relocated STP, relocated sewers, had consultant assistance.

REGION I

Public participation review in Region I consisted of reading Region I's Step 1 report of several random sample 201 projects recently completed. Further information was given by Gerald Potamis and Sharon Francis, who directs two public participation professionals in Region I's Public Participation Office. The Region I Step 1 Task Force consists of EPA staff as well as outside citizens, consultants, and municipal and State officials. This Task Force reviewed the adequacy of facility planning and developed recommendations for ways to improve public participation and consider alternative systems. The following review of State projects is based on the Task Force working papers.

Connecticut

The cities of Putnam and Shelton were reviewed by Group I. In Putnam there was evidence of a public hearing which was well summarized and showed that issues were raised by the public, but gave no detail of the consultant's or community's response to these issues. In Shelton there were about 20 public meetings with the consultant which included preparations for a referendum. The Shelton referendum passed by 80 percent of the vote.

Massachusetts

The cities of Gardner and Mansfield were reviewed by Group I. There was no mention of public participation in Gardner in the facility plan; however, a public meeting was held and separate transcripts were submitted of the public hearing. No controversies appeared at the public hearing.

In Mansfield there was a public hearing, but no transcript was submitted.

New Hampshire

The cities of Ossipee, Salem, Stratford, and Concord were examined by Group I.

Several meetings took place prior to the public hearing to which the public was invited in Ossipee. The proposed plan was not the one that the public preferred; however, it was the most cost-effective solution.

In Concord a public hearing was attended by about 50 people. Some modifications were made in the facility plan due to public participation. It was speculated that earlier citizen involvement would have brought about better results.

Only the required public hearing was held in Salem. Based on the review of the plan and project file, there was ample opportunity for public participation.

Rhode Island

The Town of Tiverton had one public hearing on the facility plan, as provided in the regulations. The minutes of the meeting showed that some lively discussion took place regarding costs. Land use issues were raised. It was speculated that public participation at an earlier date would have been helpful to resolve various issues raised at the public hearing.

Vermont

A public hearing was held in Hyde Park but an incomplete transcript of the meeting was submitted with the facility plan. As a result, it was difficult to determine the result of public participation in this 201 project.

Public participation has definitely shaped the facility plan of Stowe. Unfortunately, the public participation was a result of town meetings and subsequent bond votes, rather than the built-in public participation program. The public rejected several plans, after the fact. Early involvement by the public, before decisions of alternatives were made, would have been helpful.

Region I Comments

Due to the fact that no visit was made to Region I, comments were made on the basis of phone conversations with Gerald Potamis and on "Progress Report on Public Participation of EPA Water Programs for New England," by Sharon Francis and Barry Jordan. Other comments were received from Sharon Francis and Lester Sutton. As part of the work of the Step 1 Task Force, a regional policy statement and manual for applicants on public participation techniques have been drafted. A copy of the draft policy is enclosed. Region I's public participation review resulted from the effort of two sub-groups formed out of a larger regional Task Force to develop a regional policy which, when put into effect, would produce the most cost-effective and environmentally sound solution to water quality problems and wastewater related public health problems. The results of one of the sub-groups indicated that a majority of the facility plans reviewed were done well. The sub-group also reported that in many cases the projects had a long history of public involvement. The sub-group recommended that as a minimum, preparers of facility plans provide a summary of all public participation efforts (not just a summary of transcript of the formal hearing) to include significant comments, questions and responses or disposition of major issues.

Another sub-group prepared a draft regional policy statement on public participation (see enclosure) and a draft public participation manual for grantees.

Region I is committed to public participation and has hired Barry Jordan and Sharon Francis as special public participation consultant to serve the 208 and 201 programs, respectively. An effort to educate, and assist officials and engineers in implementing the public participation program is now going on. Region I has had special workshops with project officers and consulting engineers on methods to improve public participation in the 201 program.

The review of Group I's projects indicates that public participation will provide a better 201 project and may, as in the case of Stowe, Vermont, preclude doing several plans before obtaining public acceptance.

There is some frustration in Region I with public participation when opportunities exist and consultants and other officials make great efforts to get the public involved. Few people seem to come to meetings, leaving a small vocal minority with greater influence on public projects than their numbers would ordinarily allow.

Some innovative techniques that have been used in Region I:

- a. A consultant developed a monthly newsletter that was sent to the public.
- b. A community put the public hearing on cable TV.
- c. A radio talk show was used to publicize the project and answer questions.

REGIONAL POLICY STATEMENT
ON PUBLIC PARTICIPATION
IN WASTEWATER TREATMENT
FACILITY PLANNING

BACKGROUND

The Federal Water Pollution Control Act Amendments of 1972 call for mandatory public participation in all phases of the multi-billion dollar clean up of the nation's waters. Congress declared in the law:

"Public participation in the development, revision and enforcement of any regulation, standard, effluent limitation, plan or program under this Act shall be provided for, encouraged, and assisted..."
(Section 101e)

Our experience in New England has shown that an interested public, given adequate encouragement and opportunity, makes important contributions to the planning of treatment facilities. And yet, this aspect of facility planning has not been given as much attention as experience or the statute seem to call for.

Pollution abatement should be carried out with sensitivity to the unique conditions in each community. The public must be satisfied that long-range community goals are being served, that the areas to be sewered should be sewered, that the method of treatment chosen is cost-effective and environmentally sound, that reserve capacity in any facility is allocated in an equitable manner, and that adequate provision is made for operation and maintenance of treatment facilities.

Public participation means consultation with the public. It means a dialogue between government and citizens about decisions that may affect peoples' lives and reshape their communities. It is not enough to inform the public of decisions already made.

A commitment to public involvement can reduce the likelihood of court actions and last minute demands for Environmental Impact Statements which may seriously delay important projects. It may also improve the chances of a favorable vote on a bond issue when the time for construction approaches because public participation helps the engineer to produce an acceptable plan.

PURPOSE

The purpose of this policy statement is to assist applicants for wastewater treatment facilities planning grants in their interpretation of EPA statutes and regulations calling for participation by the public.

Regulations to implement Section 101e of the Water Pollution Control Act Amendments of 1972 on public participation were published in the FEDERAL REGISTER, August 23, 1973 (40 CFR, Part 105), and are incorporated in the Construction Grant Regulations, published February, 1974 (40 CFR 35.917-5). Their "intent...is to foster a spirit of openness and sense of mutual trust between the public and the State and Federal agencies in efforts to restore and maintain the integrity of the nation's waters."

According to the regulations, public participation programs are to cover "each of" the following activities, as they apply to wastewater treatment facility planning: "informational materials," "assistance to public," "consultation," "notification," and "access to information."

POLICY

The policy, adopted by EPA for the New England States, requires certain minimum steps to involve the public in plan development for the following categories of Step 1 facility plans:

- "first time" projects,
- significant expansion of the area to be sewered by an existing facility,
- significant expansion of a treatment plant site or reconstruction on a new site in a residential, commercial or industrial area,
- multi-community projects.

If your community is not certain that these requirements apply, EPA will make a determination prior to the Step 1 grant award.

Applicants should develop public participation tasks as part of the Plan of Study for their project. The tasks should assign responsibilities, identify principal activities, and be fully integrated into the schedule of technical study elements. Applicants are encouraged to consult with interested citizens and members of relevant boards or committees in developing the Plan of Study.

Techniques and processes for public participation will vary from one community to the next. Applicants may consult with EPA's "Manual on Public Participation" and select from a full range of methods and models in shaping a public participation program suited to the character and needs of their community. EPA recognizes the importance of flexibility in developing appropriate public participation measures, and therefore, only a few basic elements are specifically required. The regional policy stresses the following elements:

1. Educational Material for Public and News Media

The consultant should provide timely fact sheets and summaries in non-technical language during the planning period in support of items 2 and 3 below, and at other times as appropriate for informing the public about project developments. These should explain the need for pollution abatement, the alternative methods for achievement, their environmental, financial, social and economic implications and other matters of interest to the community. These should be systematically distributed to a mailing list which includes public officials, interest groups, other interested or affected citizens, and the news media. Copies of each place should also be available for use at a conveniently located depository, along with other documents, meeting summaries, maps and reports on the plan.

2. Public Meetings or Workshops

Because sewers and treatment plants may affect a community's economy and environment in many ways, it is important that their implications be discussed among the full range of interests in the community.

At least two public meetings or workshops should be held, the first early in planning to review and discuss community goals and wastewater treatment needs, and the second, later when planners are identifying alternative solutions to be analyzed. The purpose of these sessions is for the consultant to share his professional experience with citizens and listen to their advice based on knowledge of local conditions. Strong advance publicity and personal contact with public officials and citizen leaders should be conducted to assure adequate attendance. The personal invitation list should include representatives of the selectmen or council, sewer commission, board of health, planning board, regional planning commission, 208 planning agency, conservation commission, industrial development commission, finance committee and citizens representing environmental, sports, civic, business and church groups and other local organizations, as well as those who might be affected by proposed construction. State and Federal EPA officials should also be invited.

3. Public Hearing

A public hearing, also well publicized in advance, should be held after all the alternatives have been analyzed. The purpose of the hearing is to record community preferences for consideration in selection of the final plan. The consultant may recommend a preferred alternative and still assure the community that he will seriously consider other opinions expressed at the hearing.

These minimum requirements for projects in the affected categories may be modified by the Regional Administrator if the applicants and their consultants can demonstrate that other measures are more appropriate and effective.

Completed facility plans should include summaries of public participation, information distributed, meetings held, public comments, and the effect they had on the plans. The States and EPA will review the summaries and may order further efforts if public participation has not been adequate.

REGION III

Direct discussions were held with the water division director, the branch chiefs, project officer and EIS project officers regarding public participation. People that were contacted directly include:

| | |
|-----------------|------------------|
| Greene Jones | William Bulman |
| Robert Blanco | Barbara D'Angelo |
| Joe Galda | Stuart Kerzner |
| Lee Murphy | Ken Christianson |
| Robert Blaszcak | Joe Parisi |
| Ken Anderson | Rochelle Volin |

Region III's water division director asked me to sit in on a conference in which 208 project officers met with Ms. Marcia Kaplan to discuss public participation. In this conference some of the trials and tribulations that project officers found with public participation were aired. I felt, from this meeting, that the staff was committed to public participation in the 208 program, but were frustrated with public response. The disaggregation of public participation - such as 208, 201, HUD program, EPA programs - and the ability of the public to take hold of the programs were also brought out.

I discussed public participation with project officers on specific 201 projects in Region III, as follows:

Maryland

The three Maryland projects reviewed were East New Market - Secretary, Cambridge, and Kent-Narrows-Stevensville-Gresonville, F.P.

The East New Market-Secretary project was a combined sewer of two towns with a combined population of 750 people. The public was aware of the project and the wastewater treatment works generated little controversy. Two, well advertised, public hearings took place, which brought out an attendance of about 5 percent of the population. Public participation did not influence the project. The main controversy was whether there should be joint or separate sewage treatment plants. A single treatment plant was chosen. Comments were asked for; none were received.

In Cambridge, with a population of 50,000, there was no public participation, though a public hearing was held, there was no response.

The Kent-Narrows Stevensville-Gresonville, F.P., with a population of 10,000 had what Region III considered good public participation. Special public meetings took place prior to the public hearing. Due to public input there were relocations in the sewer line and elimination of

service to an area which did not require a collection system. The controversy in the project involved the local desires for more extensive service. Reduction in the service area were due to PRM 77-8 and cost. The overall project appeared to satisfy the needs and desires of most people.

Pennsylvania

In Pennsylvania, Lynn Township and Rush-Ryan-Delano Joint Sewer Authority Projects were reviewed.

In Lynn Township, a community of 720, a sewage treatment plant and interceptor sewers were built. No public participation took place prior to the public hearing, and minimal legal notification of the meeting took place. As a result, the public did not participate in Step 1 planning.

Rush-Ryan-Delano Joint Sewer Authority, with a service population of 3500, had a planned public participation program. Meetings were held in each town before the public hearing and the news media was involved in publicizing the program. As a result of public participation there was improvement in the environmental quality of the project.

Virginia

The City of Chincoteague, with a population of 5300, developed a treatment plant and sewer plan. A plan to involve the citizens was established prior to the development of the facility plan. Public meetings were planned and held which were well advertised and publicized. As a result of the public participation, a project that was estimated to cost some \$6,000,000 was not built. The reason for the no action alternative was due to the fact that this project was near a National Park where sewers would have had a major impact on wetlands.

West Virginia

The Lake Floyd Public Service District project, which sewers a population of 1300 people, had public participation only at the required hearing. The public participation had no effect on the project.

In Virginia and West Virginia the region has informally delegated public participation to the State and a State representative is at every meeting.

The region assumes public participation to be an eligible cost and feels that regulations should require early public participation.

A case-by-case review of public participation plans should be left to the discretion of the region.

Where applicable, 208 and 201 public participation should be coordinated.

The region brought up the fact that lack of public participation often creates problems. For example, a facility plan may be approved after a public hearing has been held. The applicant receives its design (Step 2) grant. When construction money is allocated (Step 3) and construction begins, a major controversy may take place, requiring the region to go back and prepare an EIS. This holds up a project and could require the redoing of Steps 1 and 2.

When a project is planned, there may be controversy for one or more elements. Better public participation may, at the least, point out the controversy so that an EIS would be done early and not hold up a project. Public participation through the construction phase is desirable.

When major efforts were made to involve the public, both in 201 and 208 programs, project officers were often disappointed by the lack of public response.

REGION V

In Region V, due to the number of large populated states involved, an average of five communities per state were examined. In addition I met with staff persons, including Ms. Annette Nussbaum, with whom I was so impressed that an entire chapter is devoted to Ms. Nussbaum's public-participation efforts. Others I met with in Region V were:

- Charles Sutfin
- Charles Orzechoskie
- Robert Goltz
- Cynthia Wakat
- Doug Hall (State of Minnesota - telephone)
- William Benjey
- Michael Mikulka
- John Piccininni
- Al Kraus
- Gene Wojcik
- Ron Drainer (State of Illinois - telephone)

PROJECTS REVIEWED

1. Minnesota

Beinidji
Moorehead
Annandale
Green Lake Sanitary District
Orno Long Lake Interceptor

2. Wisconsin

Delfield-Heartland
Sun Prairie
Heart of the Valley
Hurley, Wisconsin - Iron Wood, Michigan
Lancaster

3. Ohio

Indian Lakes
Columbus
Springfield
Plain City
New Concord

4. Michigan

Bay City
Bear Lake
Ecorse Creek
Lincoln Twp
NW Ottawa Facilities Plan
Central Branch County

5. Illinois

Ogden
Rankiu
Martington
Rockford

6. Indiana

Stueben Lakes
New Palestine
Marshall & Bloomingdale
Laporte

Minnesota

The City of Beiniidji, population of 11,480, developed a Step 1 facilities plan for a \$6,000,000 sewage treatment plant. The project was begun in 1970-1971 and EPA became involved around 1975-1976.

The consultant went ahead with the facility plan and proposed a land application sewage treatment system. This was proposed at the required public hearing where enormous controversy took place, requiring EPA to do an EIS, which is now underway. Several hundred people attended the required public hearing, where they objected to land treatment. As a result of the public hearing and public reaction, the consultant came up with a treatment discharge program, and EPA asked for further review, because the land application was most cost effective.

This project is a clear indication where public participation would have indicated controversy and where public input would have affected a choice of alternatives. Due to the lack of public participation the project was held up and the facility plan had to be redone after it had been completed.

The City of Moosehead held three separate public hearings for a \$9,000,000 treatment plant. In addition, there were meetings with special interest groups prior to making choices on alternatives. All meetings were well advertised and publicized.

As a result of the public participation the sewage treatment plant was located in a different part of the service area than originally anticipated by the engineer. Step 1 is not yet completed, and it is not possible to determine the effect on the environment or on costs that were due to citizen involvement.

The Town of Annandale, population 1600, required a \$724,000 sewage treatment plant. There was no plan for citizen participation. As a result, 20 to 30 people showed up at the public hearing.

In this project the engineer decided to use a stabilization pond. Public participation changed the engineer's design (with the active encouragement of the State of Minnesota and EPA) from a stabilization pond to land application. The end result was a less costly system which also was less environmentally damaging.

Earlier citizen participation might have speeded up the Step 1 process.

The Green Lake Sanitary District sewers two communities, New London and Spicer, with a service population of 3000. The two communities have separate treatment systems; a lake near these communities has homes sewerred by septic tanks. Within the towns phosphorous removal is a problem.

Prior to the required public hearing there was no public participation. At the public hearing controversy appeared, which required EPA to prepare an EIS. The controversy was primarily due to costs. In this project early citizen participation would have surfaced the controversy sooner.

Orono-Long Lake Interceptor is located in the Twin Cities Area. The City of St. Paul holds a public hearing once a year on its capital improvement program, which it (St. Paul) considered adequate to meet the required public participation objectives. The State of Minnesota required the City to notify affected land owners and hold hearings. As a result of public participation and State involvement, the project was removed from wetlands and a program for easements rather than outright purchase was used, which enabled the landowners to use the surface area.

Ely

An existing sewage treatment plant sewers the Town of Ely, which was built by EPA as a research and development demonstration program. Due to the high operating cost of this project, the town plans to abandon the plant. Public discussion is now underway whether the town should take over this plant or develop a new plant with lower operating costs.

There is an excellent relation between EPA and the State of Minnesota.

Wisconsin

The City of Lancaster proposed sewage treatment plant improvements at its existing site for its 10,000 inhabitants. At the regular hearing, that was not well advertised, complaints and 15 letters were received. As a result, EPA required a second public hearing. EPA agreed to the proposed project after the second public hearing.

A Hurley, Wisconsin and Iron Wood, Michigan lift station and force main for \$200,000 with respective populations of 2300 and 8000 was proposed. The required public hearing was held. This project was simple and non-controversial. Additional citizen involvement would have had no effect in this project.

The Heart of the Valley project sewers several counties and a population of 300,000. A new sewage treatment plant and interceptors costing \$19,000,000 was proposed. Good newspaper coverage of the project and consultant presentations before civic groups took place prior to choices being made on the alternatives. Citizen interest was passive.

The project was in a river bed which was not adequately brought out at the first public hearing. A second public hearing was held and every property owner along the river front was notified. Eighty percent of the river front property owners were at the second hearing. They all wanted the project.

Sun Prairie, a community of about 20,000, had public participation both before and after its public hearing. In this \$7,000,000 sewage treatment plant and interceptor sewer project, public participation caused some changes in the public facility plan and some changes in the details that the facility plan dealt with. A better facility plan did come about due to public participation, but no changes in the alternative occurred. Due to the public participation some issues were raised and discussed. The Regional Planning Commission participated in meetings with the public and helped to explain the program.

Due to the public interest, meetings were held after the public hearing. The facility plan looked at several alternatives, including regionalization and land application, but settled on advanced water treatment prior to discharge into a river.

The Delefield-Heartland sewage treatment plant and interceptors which sewer about 30,000 people, costing about \$12,000,000, was developed without citizen participation, but became a political issue. The first facility plan was submitted when elections were about to take place. The election issue centered around the wastewater treatment facility. As a result, new officials were elected.

The new officials fired the engineer and hired another engineer to redo the project. Two additional public hearings took place besides the original public hearing.

The news media were involved. Some citizens asked for an EIS.

The State of Wisconsin provides excellent cooperation and coordination on EPA projects.

Ohio

Indian Lake is a resort community whose seasonal population varies from about 10,000 to 93,000. A 23 million dollar sewage treatment plant and interceptor sewer project was planned for this community without any public participation.

Lack of public information about the project led to "investigative reporting" by the local newspaper. As a result, just prior to the public hearing, the local newspaper came out with a headline and story stating that sewers could cost \$50 per month to local residents. As a result of the newspaper articles, about 900 people showed up at the public hearing, including a representative of the State of Ohio. The

State officials added fuel to the controversy by threatening to "close down the community" if the wastewater treatment facilities were not built. The County Commissioner, who moderated the public hearing, failed to answer any questions. The public hearing lasted from about 7:00 PM to 1:00 AM.

After the public hearing about 120 letters were sent to EPA's regional office objecting to the project. A later petition was submitted. EPA Ohio was confused with U.S. EPA by local residents, which was reflected in the letters.

Lack of public participation and the objections filed caused U.S. EPA to send the project back to the State of Ohio to take a look at possible alternatives.

No decision has yet been made on whether EPA will do an EIS. The applicant held two additional public hearings and plans no further public participation.

Columbus, a city with a population approaching one million, prepared a facility plan costing between 60 and 80 million dollars. At the present time EPA is doing an EIS primarily because there was poor public participation. Citizens complained to EPA that they were not well enough informed prior to the choice of alternatives to provide public input.

There is likely to be increased cost to the project due to citizen participation, since the cost escalation of construction will occur while the EIS is being written.

This project is an example of poor public participation in a major city.

In Springfield, a \$12,000,000 project award was made, which is being held up due to a law suit against Summit County. There is speculation in the regional office that the law suit might not have occurred if public participation would have been better handled. A citizen group was formed to oppose the project due to costs.

Plains City planned to build a \$4,700,000 oxidation ditch for its 2400 people. No public participation took place until the required public hearing. It is speculated that public participation would have been responsible for a better project by looking at alternatives.

New Concord held the minimum required public hearing for its sewage treatment plant and interceptor sewers, which together cost about 1½ million dollars. The 2800 people in the town were not involved. Even the public hearing consisted merely of public officials and the consulting engineer.

It was speculated by EPA that public participation would have brought about a better project.

Michigan

Bay City is a community of 200,000 where a \$60,000,000 sewage treatment plant and sewers were proposed. The consultant was very familiar with the community, which helped him to develop a coordinated public participation program at the outset. Not only did the consultant do an excellent public relations job, but he coordinated with county officials. As a result, the people were well informed.

One of the things the consultant did was to talk to industries at an early date. As a result, Dow Chemical Company donated 75 acres for a sewage treatment plant, of which 50 acres will be used as a park.

Public meetings were held before the decision on alternatives took place. Costs were fully explained and publicized.

As a result of citizen participation there was a definite decrease in costs and improved environmental quality. One hundred and fifty people attended a well advertised meeting. Issues were raised at the public hearing that affected the final plan.

Bear Lake's facilities plan calls for an expenditure of \$5.5 million for a sewage treatment plant and sewers. The consultant mailed questionnaires to the entire community before starting the project. Only 15% of the populace received the questionnaires. The tourists to Bear Lake generally failed to participate, but wrote to EPA to voice their objections.

A property owners association was formed to oppose the project, due to costs, which caused public participation. As a result, extra public meetings were held during the summer.

About 100 people attended the public hearing, after which two more hearings were held.

It was felt by EPA that public participation could have been handled better by the applicant.

Ecorse Creek is in populous Wayne County. A sewer separation project, serving almost 400,000 people, was proposed with public participation.

As a result of public participation and EPA policy, which forced many changes and which delayed the project, the cost was decreased from an originally estimated \$175 million to \$60 million, sewer lines were relocated, which improved both the environmental quality and the social conditions. Between 200 and 300 people attended the public hearing.

Lincoln Township, population 10,000, planned to develop collection sewers, a force main, and a pump station costing \$8.5 million dollars.

The consultant sent out 2600 questionnaires and received 1600 replies. These questionnaires and a public meeting allowed local participation to occur before a decision on alternatives was made.

The consultant made about 300 telephone calls the day before the public hearing asking people to attend the public hearing. As a result of the open policy of the consultant, strong support for the project took place.

In addition to the public participation, the consultant coordinated his project with the regional planning agency, which submitted an early, favorable A95 support statement.

The facility plan was completed in a very short time period - about 6 months. Public participation helped speed the project.

The Northwest Ottawa Facilities plan for sewers serving 13,800 people in Ottawa County, is estimated to cost \$17,500,000. This area is in desperate need of sewers and is high on the State's priority list.

Several township meetings were planned prior to the public hearing to involve citizens prior to decisions on alternatives. However, there was poor citizen participation at these meetings.

The Lake Michigan Federation petitioned EPA to provide changes. The citizen participation resulted in lower costs for the project and improved environmental quality as some sewers were not built on sand dunes.

Central Branch County's facility plan requires an all new system for its people, costing \$12 million. Almost 250 people attended the public hearing. After the public hearing the facility plan had to be revised. Land application with spray irrigation on leased land is now being proposed. A new public hearing for a decreased cost and an improved environmental quality project is to be held.

Illinois

The City of Ogden proposes a collection system with sewage treatment facilities for its 543 people. The State of Illinois sees no demonstrated need at this time.

Public participation did not exist on this project except for the required public hearing. This project is not expected to go ahead.

In the Town of Ranken, population 727, a sewage treatment plant and collection sewers were proposed. No public participation, except the public hearing took place. The State of Illinois has returned the project to the community so it could evaluate using the existing treatment system.

In Martington, population 300, a clustered septic tank system was deemed adequate and was proposed by the consultant. Public participation included special meetings with citizen and public meetings with citizen groups. The consultant had to sell this system to the community and compared the user costs of \$13 per month to the next lowest cost of \$17 per month.

As a result of public participation this lower cost system was approved by the community and by the State.

The City of Rockford, with a population exceeding 100,000, had made an effort to involve its citizens in public participation in various sewer projects by scheduling different public hearings in neighborhoods. Very few people attended the hearings. An apathetic community did not affect the project.

In the State of Illinois there were many consulting engineers that convinced very small communities that they needed sewers and treatment facilities to meet EPA requirements. As a result there were a very disproportionate number of small projects submitted for State prioritizing. The State issued a moratorium for small community systems until a review of applications could be made. This is an example of outright misrepresentation of EPA by local engineers.

The State of Illinois requests (not requires) communities to use larger ads to publicize public hearings. It also encourages communities to have early public meetings.

Larger communities in Illinois are not finding the public concerned with the 201 program, according to State officials.

Indiana

Steuben Lakes is a resort community whose population varies from 6000 permanent residents to 22,000 seasonal residents. A 2 MGD STP and sewers costing \$14 million is proposed. An EIS by EPA is now underway.

The consultant scheduled one meeting with each Lake Council and eventually met with public groups on a weekly basis, getting good public response.

The resulting citizen participation increased the total project cost and hurt the environmental quality through relocation of sewer lines. About 80 people attended the public hearing.

New Palestine is located about 6 miles from Indianapolis with a population of 863.

New Palestine is an example of poor public participation and shows the need for EPA attendance at public hearings. The public hearing was moderated by the city attorney. At this public hearing all questions relating to costs were deemed inappropriate and, hence, were not answered.

The New Palestine project dates back to 1972 when a P.L. 660 grant was made to the applicant. Litigation occurred as EPA was sued to prepare an EIS. EPA requested the town to prepare an environmental assessment. As a result EPA issued a negative declaration in March, 1977.

The town is trying to build a sewage system that will induce development. Those opposed to the extensive sewerage are anxious to preserve agriculture in the County. A conflict occurs regarding future land use development which affects this project. Some conflict of interest questions have also been raised. Better public participation would have surfaced these conflicts sooner.

LaPorte's sewage treatment plant, costing \$6,000,000, is to serve the city of 18,000. Two meetings were held prior to the decision on the alternatives at which time people living downstream from the treatment plant were very concerned.

As a result of public participation the cost was decreased and environment improved. Of the 50 people attending the final public hearing, 40 came from outside the sewage service area, living downstream from the discharge point.

Marshall and Bloomingdale are two small communities with populations of 365 and 391 respectively. These communities were several miles apart. A proposed connecting sewer and sewage treatment plant were proposed by the consulting engineer, costing \$2,000,000. No public participation took place until the required public hearings. Twenty-two citizens attended a public hearing in Marshall and nine citizens attended a public hearing in Bloomingdale.

The engineer stated that the two communities were presently in violation of the law and that the proposed system (no alternatives) he designed would be the only system which would bring about compliance with the existing law.

Bloomingdale rejected the proposed plan due to costs.

This project had virtually no public participation.

Public Participation Comments - Region V Staff

EPA should establish new regulations on public participation which would:

- a) require meetings soon after grant has been made;
- b) require meetings before alternatives are chosen;
- c) require publication of user costs;
- d) require better advertisements, including large advertisement in paper - not just legal ad - public service announcements on radio, etc.;
- e) there must be a method to enable the communities to meet public participation requirement if the community does not start public participation early (catch up).

The regional staff believes that coordination between 201 project public participation and 208 project public participation should be done wherever applicable. Some staff feel that the broadest coordination should take place. Most staff are reluctant to broaden public participation of 201 programs beyond the 208 program, feeling that 201 projects would get lost among other projects.

More field work by EPA staff is needed. Project officers should be more visible and accessible. One project officer felt that all government employees were viewed in small communities as "the bad guys".

EPA employees should, it is generally felt:

- a) hear problems in communities first hand;
- b) forestall engineers from "pulling the wool" over public's eyes;

1) Examples:

- a) City Attorney in an Indiana city who moderated the public hearing stated that EPA is not interested in costs. He then determined all questions on cost were irrelevant and not to be discussed. This is not untypical in Region V.
- b) In an other Indiana city, the enineer did not prepare alternative solutions, implying that the community had to build this system (one he designed) to conform with existing Federal laws. More detailed analysis of non-conventional systems should have been made.

- c) In Illinois, before emphasis on small treatment systems became popular, engineers visited small communities throughout the State claiming that the community had to have a sewage collection system and treatment plant or they would violate the law.

Better facility plans occur when the public participates in a 201 planning program in the following ways:

- A) Allows public to know about project and its scope before final decisions are made;
- B) Generally puts the engineer in a position where he must think things through, and by being responsible to public scrutiny, he will do a better job;
- C) Enables the project to have input by people who are affected, such as those living downstream of the discharge point, at an early time. This often brings out controversy before there is a commitment to any specific solution and may result in an early EIS decision;
- D) Public participation may have eliminated the need for an EPA EIS in many instances or identify where early start up (piggy-back) is possible;
- E) Environmental concerns would surface early.

Region V is committed to public participation and encourages such public participation in all 201 projects. The region is far ahead of local and State officials in its support for public participation. In most instances the best public participation programs came about through the regional office's direct involvement and suggestions that early public participation take place. Project officers often had to prod local agencies and consultants to start the public participation programs early.

The dollar commitment in public participation is not necessarily a measure of good public participation. Some communities used minimal funds, but had good public participation, while others used large sums and had poor public participation. The resourcefulness of the involved officials and engineers plays a much greater role than dollars committed.

At the present time there is extensive staff travel. At the rate of existing staff travel, the present travel budget in the water division will be depleted by July. Yet it is important not only to make EPA visible in 201 projects, but also to visit State agencies, especially with new delegation provisions of the Cleveland-Wright amendments, and visits to Corps of Engineers offices.

Many problems could be solved if EPA and the State met with the applicant and engineer early.

It is desirable to advertise costs in the required notice of public hearing. The advertisements should be more than tiny legal notices.

One suggestion, that a minimum number of people should attend a public hearing, was made. The project officer thought that EPA should establish a quorum requirement.

PRM 77-8 requires that engineer be educated. Some engineers don't know how to design alternate systems - critical in small communities.

The 208 public participation experience in Region V has prompted many project offices to ask for similar 201 assistance in public participation. The use of a trained person who can direct the use of spot announcements, movies, and advertising to make people aware that they can partake in public policy is deemed a necessity.

Care needs to be taken so that interested people living outside the immediate service area, such as downstream residents, are as informed of the public participation opportunities as the people within the 201 project area.

Establish new regulations requiring early public participation, but leave maximum implementation discretion to regions.

REGION VI

I visited Region VI and among the staff I met were the following:

Ned Burleson
Hendon Crane
Joe Haney
Richard Harper
Bob Hillery
Dave Neligan
Gene Wossum

Texas

San Antonio began a citizen participation plan early. The consultant included citizen participation as one element in his Plan of Study and participated in meetings and workshops.

In San Antonio two consultants were hired; one to do the facility plan without the environmental impacts and one to do an environmental impact statement - piggyback. The estimated total costs were \$36,000,000 for a sewage treatment plant and \$100,000,000 for sewers.

In the early stages of the project EPA and the grantee met and determined that a broad-based citizens advisory committee should be formed which consisted of members from following:

| | |
|--|-------------------------|
| Federal/Military Impact | 1 Representative |
| Spanish-American Community for Economic Development | 1 Representative |
| The Business Community | Several Representatives |
| Aquifer Protection | 1 Representative |
| Mayor of a Small Community | 1 Representative |
| City Council | 1 Representative |
| San Antonio Redevelopment Authority | 1 Representative |

The advisory committee meets monthly, at which time both consultants bring progress reports and EPA and the State are present. In addition, San Antonio hired a public relations man who spends about 80 percent of his time on the 201 project.

A local brewery sponsored a bus tour for the advisory committee so that members could see existing and proposed facilities from the ground.

The advisory committee sponsored workshops for special interest groups to broaden public involvement. When the consultant was ready to do sewer smoke tests, special flyers were distributed to residents warning of the tests and explaining to the public that manholes would emit smoke. This public awareness resulted in good public relations, and no unnecessary fire calls.

The advisory committee recommended a solution that was not the most cost-effective and might increase the total cost; it also established a priority system in which sewer construction for interceptors and collectors was phased to meet anticipated revenues over a period of time.

The Citizen Advisory Committee is expected to function through the construction period. It will notify people of construction progress and traffic impedments due to construction.

Citizen participation may have held up the project by one or two months, but it probably justified its existence by surfacing public concerns at an early date and having no major controversies at the end of Step 1.

By contrast, in Houston there was little public participation in the 201 planning. The public was aware of the need to sewer the city and provide new sewage treatment facilities.

Oklahoma

Bartlesville proposed \$4 million expenditures on a treatment plant and \$5 million on sewers in its Step 1 program.

Public meetings were planned and held prior to the decisions on alternatives. Newspapers and radio provided excellent coverage before the public hearing.

A citizens advisory committee, made up of engineers, was appointed. Both public and private meetings were scheduled with the advisory committee.

As a result of the controversy, which was in large part due to the location of the sewage treatment plant, many petitions were received by EPA, both for and against the project. The Regional Administrator went to Bartlesville to personally conduct a public hearing before accepting Step 1.

A bond election for sewers was approved with a 9:1 majority. Later three councilmen who were opposed to the facility plan were defeated in their bid for re-election.

The Tulsa Regional Metropolitan Utility Authority is developing a plan for an \$80,000,000 wastewater treatment facility consisting of a treatment plant and sewer lines.

In this project public participation did not take place until after major decisions were made on alternatives. At the public hearing there emerged controversy over the discharge location into a local creek.

Citizen group involvement took place after the public hearing and after a special meetings with EPA staff. EPA organized an ad hoc committee which looked into alternatives, one of which was an outfall sewer to the Arkansas River.

Citizen involvement will affect the project by decreasing the cost of the project and improving the environmental quality. Earlier citizen involvement would surely have saved time.

New Mexico

A steering committee, meeting monthly with citizens and special interest groups, was organized in Albuquerque for its \$25,000,000 wastewater treatment project. Citizen participation took place early, and steering committee meetings had as many as 100 people attend monthly meetings.

Partially as a result of public participation, an EIS was piggy-backed, which saved time.

Public participation improved the environmental quality of the project, but had no effect on costs. The facility plan was responsive to citizen scrutiny, and changes were made due to citizen participation.

Forty-five people attended the public hearing for the facility plan.

Region VI Public Participation

Region VI considers each community to contain unique conditions to which it tries to be sensitive. The region is fully committed to public participation and believes that when the public is involved in facility planning, everyone benefits.

Region VI requires a plan for public participation in the plan of study. As a minimum, the plan must encompass preparation and distribution of a fact sheet about the project, news releases to the press and a public hearing before the final plan is selected. A draft regional policy statement for Region VI is attached.

It is suggested by Region VI that Headquarters issue guidance on eligible funding for public participation. For example, is a community eligible for reimbursement for their public relations employees' time spent directly on public participation? Can the tour of existing plants and proposed STP sites by an advisory group be an eligible cost?

The regional staff often finds it frustrating to promote citizen participation and find few who attend public meetings and hearings.

REGION VI POLICY STATEMENT ON PUBLIC PARTICIPATION
IN STEP I FACILITY PLANNING GRANTS

EPA's commitment to public participation in planning wastewater treatment facilities arises from our concern that Federal requirements for pollution abatement be carried out with sensitivity to the unique conditions in each community.

The national construction grants program is vital to clean water goals. The primary goal of the program is to improve the water quality in our rivers and lakes.

To accomplish this, Congress has provided, and is expected to continue to provide, billions of dollars for the Federal portion of the costs of building municipal wastewater treatment facilities. Millions of those tax dollars are being spent in communities throughout Region VI.

The community is where the action is. When the public becomes interested and involved in planning treatment facilities, everyone benefits.

The public has a right to be assured that long-range community goals are being served and that the plan adopted is cost-effective and environmentally sound. Public participation means consultation with the public. It means a dialogue between government officials and citizens about decisions that may affect peoples' lives and the shape of their communities. It means informing the public about alternatives and options and making sure that public responses are incorporated into final project decisions.

Early and effective public involvement is the way to avoid time-consuming last minute court actions and demands for further environmental studies.

Adequate public participation increases the probability that the completed facility plans will have sufficient support throughout the community to be implemented as expeditiously as possible.

Public participation is required under section 101e of the Federal Water Pollution Control Act which states: "Public participation in the development, revision, and enforcement of any regulation, standard, effluent limitation, plan, or program under this act shall be provided for, encouraged, and assisted..."

In line with this requirement, it is EPA policy that the public must be involved at the earliest possible time in the development of all Step I facility plans. It is therefore Region VI policy that:

*A plan of public participation must be outlined in the Plan of Study and summarized in the completed facility plan. As a minimum, the plan must encompass preparation and distribution of a fact sheet about the project, news releases to the media, and a public hearing before final selection of the plan.

*In situations where there is substantial indication that the project may be controversial, an Environmental Impact Statement, if needed, will be prepared concurrently with the plan development and the public will be so advised.

*In controversial situations, a citizens advisory committee should be established at the beginning of the planning process.

Development of an effective plan of public involvement, for each Step I grant project, will help assure maximum efficiency in the expenditure of tax dollars allocated to your community through the U.S. Environmental Protection Agency.

Adlene Harrison
Regional Administrator

RECOMMENDED STEPS TO ENCOURAGE PUBLIC PARTICIPATION

Identify the individuals and groups in the community most likely to be affected and/or concerned about the project. Compile a mailing list of individuals and community groups, such as agriculture, business, industry, consumer, women, environmental, labor, minorities, urban, youth and public interest.

Identify the issues of public concern to be addressed in the course of plan development. These should be included in a fact sheet in laymen's terms about the project given wide distribution as early as possible. Public involvement activities should begin 60-90 days before any public hearings are scheduled.

Distribute a news release announcing the project to all local media plus the general mailing list. Participation of local officials in the pre-application conference might be used as a "news peg" to make the announcement. News releases should be issued at each major step in the plan development process.

Schedule and publicize at least one informal public meeting/workshop to discuss the issues identified above. Names of those attending should be added to the mailing list. Follow-up public meetings should be scheduled as necessary.

Form an advisory committee representing a cross section of the community to spearhead the public participation program.

A field trip to the proposed site or sites might be undertaken especially in controversial situations.

Schedule and publicize the required public hearing before a decision on the facility plan is made.

[illegible]

REGION IX

In Region IX, I discussed public participation with regional staff. Among the people I talked with were:

Richard Coddington
Mark Zuckerman
Fred Krieger
Bill Helphingstine
Loraine Pearson
Doris Lee
Mark Brucker
Val Danos
Chirs Carroll

The following projects were examined:

California

Central Contra Costa
Los Angeles Wastewater Facilities Plan
Orange County Sanitation District
East Bay Discharge Authority
Los Angeles County - Joint Outfall System Facilities Plan

Arizona

Globe
Pheonix

Nevada

Clark County Sanitary District
Las Vegas
Dayton
Sun Valley

California

The Central Contra Costa facility plan involved citizens prior to the decision on alternatives for its \$50 million sewage treatment plant through a series of community workshops. This project considered the need to provide for growth, which became a major issue. The area is struggling with air quality, unemployment and costs. There also was a question regarding the use of solid refuse in the treatment plant as fuel.

The facility plan and EIS have been completed. One hundred and fifty people attended the public hearing, which was well advertised with an eight page Sunday supplement in the local newspaper. There is no indication that public participation had an effect on the project.

The City of Los Angeles developed a facility plan with piggyback EIS for its \$300 million wastewater treatment facilities. Through its community action planning staff the City of Los Angeles involved the public and obtained public participation. An eight page supplement to the Los Angeles newspapers was produced for distribution to the public for EIS meetings and citizen comment.

There appear to be no major effects due to citizen participation as citizen turnout was exceedingly light for public meetings, public hearings and workshops. In any case, there was ample opportunity for citizens to participate in the decision making process.

The Orange County Sanitation District selected a task force from different locations and interested citizens in the county who acted as a citizen advisory committee and developed workshops throughout the proposed service area. Their main concentration was on the EIS that was piggybacked with the facility plan.

Numerous press releases were issued by regional staff on the EIS to all media. An eight page special Sunday supplement was placed in local newspapers inviting comments. Five workshops were held, bringing out about 200 people to each workshop.

There were some improvements in the final facility plan due to the workshops and citizen participation. It is difficult to determine how the cost of the public participation could be justified, based on attendance.

In Los Angeles County a joint outfall system facility plan was proposed, together with an EIS that was piggybacked. A plan for citizen participation was developed prior to beginning the facility plan, which included a citizens committee to be formed with many workshops.

Public participation did take place. In addition, an eight page Sunday supplement was put into newspapers. A slick summary of the EIS was mailed to each household prior to the public hearing.

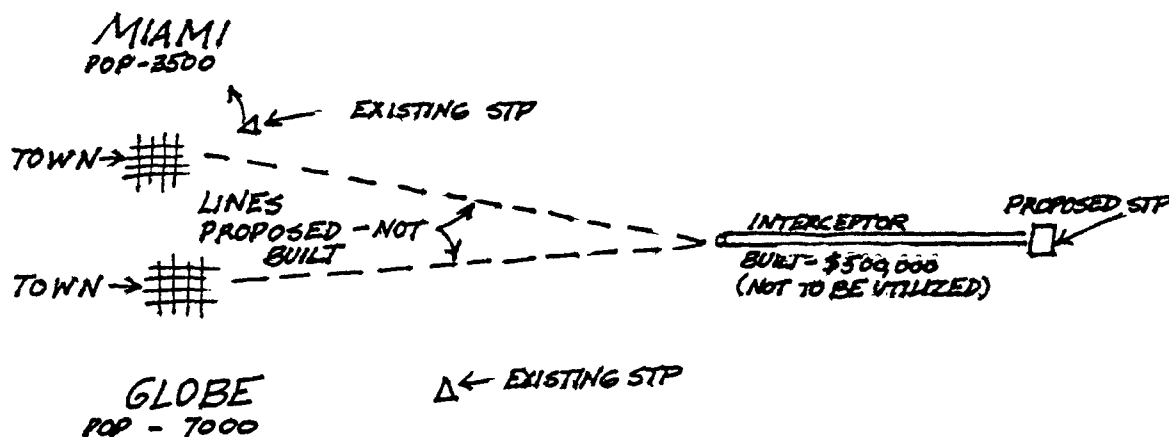
Arizona

The City of Globe developed a facility plan for a required treatment system with the Town of Miami in 1972. Globe received a grant for Steps 1, 2, and 3, and were given out simultaneously. Construction for a \$500,000 interceptor was completed in 1972 before construction halted due to local controversy. In 1975, Region IX made a decision to do an EIS to resolve local controversy before proceeding with the project. The EIS process had an active public participation program and a final EIS was issued in April, 1976. In essence, it refuted the earlier project concept of a regional treatment system, and recommended two separate treatment systems. The \$500,000 inteceptor, already built, was not to be utilized.

It is evident that an effective public participation program in 1972 may have demonstrated that controversy existed and an EIS done earlier or the controversy might have been resolved and an EIS might not have been necessary.

An early, effective citizen participation program might have saved as much as \$500,000 in facility planning, design and false construction.

Diagrammatic Sketch of Project as Proposed in Globe



The City of Pheonix developed its facility plan, with an estimated cost of \$50 million, for a wastewater treatment plant and sewers with an EIS piggybacked.

Three citizens advisory committees were organized and many workshops took place. In this case the 208 mechanism for public participation was used in the 201 project and close coordination between 201 and 208 planning took place.

Meetings in Pheonix were well advertised. The results from the advisory group are becoming very helpful; it reviews the content, presentations, conclusions and other aspects of the facility plan. Some improvements in environmental quality of the project are evident.

The chairman of one of the advisory groups works for the State of Arizona and is given time off to be active on the advisory committee. As a result, the chairman spends considerable time on the project.

The three committees meet two to three times per month, each.

Meetings of the advisory committee take up about half a day per month. EPA attends few meetings and the EIS and facility planning consultants are paid to attend meetings. In addition, 208 staff serve the committee.

The project is still underway and no final public hearings have been held. In this project, the regional EPA staff met with the city and insisted on public workshops. The city chose the 201-208 advisory committee as the tool for citizen participation.

Nevada

The Clark County Sanitary District and the Torgabe National Forest got together to develop a facility plan in an area that has many second homes and is primarily a seasonal community. Concern with possible septic tank failures prompted the joint study.

A citizen participation plan was developed in which public meetings took place in December and flyers went out through the 208 agency.

The first public workshop had four people in attendance; 50 persons showed up for the second.

In this community public participation was deemed a failure, since few showed up and few commented on the proposed plan.

A non-structural solution is being proposed. The final public hearing has not yet been held.

The Town of Dayton, population 800, had no public participation plan prior to developing its facility plan. However, controversy forced citizen participation which resulted in a number of workshops for the \$600,000 sewage treatment plant and sewer project. Questionnaires were completed at the second workshop and the residents have taken an active role in the facility plan. As a result of public participation, some changes were made.

In Sun Valley, population 900, there were a number of public meetings held even though there was little planning for such meetings when the facility plan was started. The community was involved through the citizen participation process prior to the decisions on alternatives.

The district encouraged public participation through the use of a monthly newsletter.

Region IX Comments on Citizen Participation

Region IX is committed to public participation and is willing to pay for it. Furthermore, Region IX takes the position that public participation should go on throughout the grant program -- through Step 3 -- until the total program is implemented.

Community public relations programs which explain the effects of construction such as street closures, traffic rerouting, and the like should be eligible cost items. Where large communities have existing staff for public relations, these communities can handle public relations adequately.

In Region IX it is generally felt that public participation:

- a) provides for better projects;
- b) builds public support where lack of public support could delay or derail a project;
- c) provides liason with the community;
- d) should be started early in the planning process and be continued through Step 3;
- e) expounds the communication link between the State, the grantee, the consultant and EPA.

Require a public participation plan in the first phase of the facility plan.

Leave the mechanics used for public participation such as advisory group, task force, workshops and the like up to the grantee, State and region. Minimum guidelines should be issued from Headquarters.

Small and medium sized communities need assistance from someone other than the engineer in implementing public participation, possibly the EPA project officer. In some instances, a public participation consultant may be hired. Large communities have their own public relations staff.

A policy statement on public participation and changes to the public participation regulations are needed which would specify minimum criteria.

SPECIAL COMMITMENT OF REGION V TO PUBLIC PARTICIPATION -- MS. ANNETTE NUSSBAUM

Region V hired Ms. Annette Nussbaum in its water division specifically to help implement the public participation requirements of the 208 programs, which had previously been floundering. Ms. Nussbaum comes from a background, unique in EPA, which includes newspaper work, radio, television, advertising and theater. As a result Ms. Nussbaum knows how public participation can be promoted, knows how to program public meetings in order to obtain the maximum public participation, and is capable of channeling citizen participation into constructive actions that give credit to the Agency. Every EPA project officer that I talked with, who was involved in the 208 program, had high praise for Ms. Nussbaum's work.

Among the things Ms. Nussbaum has done are:

1. Preparation of EPA display material that can be used in State Fairs, regional meetings, and other public gatherings. Several of the display packages - which consisted of questions and a choice of three answers - (where a light comes on when the correct answer is chosen) have been worn out by the public. While the display machine was being used, EPA brochures and public material were picked up. Previous similar booths were passed by.
2. Records for radio spot announcements were made to advise people to, "come, come on in...the water's going to be fine...if you help on planning for clean water".
3. Newspaper advertisements that address specific issues exceedingly well.
4. Special handouts for 208 agency use at public meetings or prior to public meetings.
5. A brochure that explains PL 92-500 in the language that a citizen can understand.
6. Region V bulletins.
7. Films that dramatize the benefits of clean water -- fishable and swimable -- in layman's terms.
8. Provides special assistance to 208 project officers and occasional assistance to 201 project officers in providing for public participation.

The uniqueness of Ms. Nussbaum is that she occupies a position on the staff within the water division. Her success in the 208 program has been recognized by the entire region, and there is some talk about coordinating all public relations activities through the regional public affairs officer -- expanding the program to clean air, 201 and other EPA activities. The water division is opposed to this policy because they fear that it would take away their staff and thereby dissipate Ms. Nussbaum's effectiveness. The Municipal Construction Division should support the water division in Region V.

The expansion of Ms. Nussbaum's activities into the 201 program through additions in her staff is highly recommended. A professional public relations person like Ms. Nussbaum can help direct public participation expenditures and programs. further.

Ms. Nussbaum is an example of the value of a public relations professional in the regional office water division. A similar position should be established in other regions and the present position should be expanded, with additional staff, as applicable, to work on 201 public participation programs.

Region VI, by contrast, uses their Office of Public Awareness to assist in public participation programs.

It has been demonstrated in the previous analysis of 201 projects that the consulting engineer is generally not qualified to handle public participation, and often opposed to public involvement. Regional project officers have been in the forefront in promoting public participation, and they need the assistance of a professional in order to aid them in a field that is becoming increasingly important.

| STATE | COMMUNITY | Population in Thousands | Cost in Million Dollars | STP (s); Sewers (i); Both (#) | Environmental Impact Statement | Meet With Special Interest Groups | Flyers | Use of News Media in Planning | Public Meetings | Other | Innovations | Citizens Involved Before Decision on Alternative | Meeting Advertised | Minutes or Summaries | Costs Explained | Costs Publicized | Evidence Public Particip. Affected Plan | Explained Environmental Effects | No Effect | Increased Total Cost | Decreased Total Cost | Improved Environmental Quality | Hurt Environmental Quality | Relocated Sewage Treatment Plant | Relocated Sewers | Publicized Beyond Legal Advertising | Attendance at Public Hearing | Issues Raised Affecting Plan | Response: No Effect | Response: Changes Suggested, Changes Made | Response: Changes Suggested, No Changes Made | Staff Assistance to Citizen Group | Consultant Assistance to Citizen Group | Other | | |
|-------|-----------|-------------------------|-------------------------|-------------------------------|--------------------------------|-----------------------------------|--------|-------------------------------|-----------------|-------|-------------|--|--------------------|----------------------|-----------------|------------------|---|---------------------------------|-----------|----------------------|----------------------|--------------------------------|----------------------------|----------------------------------|------------------|-------------------------------------|------------------------------|------------------------------|---------------------|---|--|-----------------------------------|--|----------|------------|--|
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| STATE | COMMUNITY | Population in Thousands | Cost in Million Dollars | STP (s); Sewers (i); Both (#) | Environmental Impact Statement | Meet With Special Interest Groups | Flyers | Use of News Media in Planning | Public Meetings | Other | Innovations | Citizens Involved Before Decision on Alternative | Meeting Advertised | Minutes or Summaries | Costs Explained | Costs Publicized | Evidence Public Particip. Affected Plan | Explained Environmental Effects | No Effect | Increased Total Cost | Decreased Total Cost | Improved Environmental Quality | Hurt Environmental Quality | Relocated Sewage Treatment Plant | Relocated Sewers | Publicized Beyond Legal Advertising | Attendance at Public Hearing | Issues Raised Affecting Plan | Response: No Effect | Response: Changes Suggested, Changes Made | Response: Changes Suggested, No Changes Made | Staff Assistance to Citizen Groups | Consultant Assistance to Citizen Groups | Other |
|-------|---------------------------------|-------------------------|-------------------------|-------------------------------|--------------------------------|-----------------------------------|--------|-------------------------------|-----------------|-------|-------------|--|--------------------|----------------------|-----------------|------------------|---|---------------------------------|-----------|----------------------|----------------------|--------------------------------|----------------------------|----------------------------------|------------------|-------------------------------------|------------------------------|------------------------------|---------------------|---|--|------------------------------------|---|-------|
| MD | EAST NEW MARKET, SEPTIMAR | 08 | 05.5 | | N | N | N | Y | Y | | | Y | Y | Y | Y | N | N | Y | | ✓ | | | | | | Y | 34 | N | ✓ | | | N | N | |
| MD | CHIMBRIDGE | 50 | | | N | N | N | N | N | | | Y | Y | Y | Y | N | N | Y | | | | | | ✓ | | N | 0 | N | ✓ | | | N | N | |
| MD | WENT. MARFORDS GREENVILLE, E.P. | 6 | 135 | # | N | N | Y | Y | | | | Y | Y | Y | Y | N | N | Y | | | | | | ✓ | | Y | 72 | Y | ✓ | | | N | N | |
| PA | LYNN TWP | 07 | 13 | # | N | N | N | N | | | | N | N | N | N | N | N | N | | | | | | | | N | N | N | ✓ | | | Y | N | |
| VA | ACCOMACK | 5 | 6 | # | Y | N | Y | Y | | | | Y | Y | Y | N | N | Y | Y | | | ✓ | | | | | N | 15 | Y | ✓ | | | Y | NOT KNOWN | |
| WV | LANE FLOYD TOWNSHIP | 13 | 2 | # | N | N | Y | N | | | | Y | Y | Y | N | N | N | Y | | ✓ | | | | | | N | 34 | Y | ✓ | | | Y | | |
| WV | BENNING | 11.5 | 59.5 | S | Y | Y | N | N | N | | | N | Y | Y | Y | N | N | N | | | | | | | | | | | ✓ | | | Y | | |
| MO | MOOREHEAD | 9 | 5 | | Y | N | N | Y | | | | Y | Y | Y | N | N | Y | Y | | | | | | ✓ | | Y | 50 | Y | ✓ | | | | | |
| PA | ALLENHURST | 16 | 07 | 1 | N | N | N | N | | | | N | Y | Y | N | N | Y | Y | | | | | ✓ | | | N | 25 | Y | ✓ | | | | | |
| PA | GREEN LAKE SP | 3 | 6 | 1 | Y | N | N | N | N | | | N | N | N | N | N | N | N | | | | | | | | | | | | | | | | |
| PA | INTERNATIONAL LAKE INTERLAKES | 1 | 1 | | N | N | N | N | | | | N | N | Y | N | N | N | N | | | | | | | | N | 35 | Y | ✓ | | | | | |

REGION 4 POP COST PARTICIPATE REGIONAL REVIEW DOE TO LACK CFA

PROJECT WAS NOT KNOWN

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REGION 4 ROP
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REGION REVIEW
DUE TO LACK CPG

PROJECT WAS
NOT RUL'D

| | STATE |
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| | COMMUNITY |
| Population in Thousands | |
| Cost in Million Dollars | |
| STP (#); Sewers (#); Both (#) | |
| Environmental Impact Statement | |
| Meet With Special Interest Groups | |
| Flyers | |
| Use of News Media in Planning | |
| Public Meetings | |
| Other | |
| Innovations | |
| Citizens Involved Before Decision on Alternative | |
| Meeting Advertised | |
| Minutes or Summaries | |
| Costs Explained | |
| Costs Publicized | |
| Evidence Public Particip. Affected Plan | |
| Explained Environmental Effects | |
| No Effect | |
| Increased Total Cost | |
| Decreased Total Cost | |
| Improved Environmental Quality | |
| Hurt Environmental Quality | |
| Relocated Sewage Treatment Plant | |
| Relocated Sewers | |
| Publicized Beyond Legal Advertising | |
| Attendance at Public Hearing | |
| Issues Raised Affecting Plan | |
| Response: No Effect | |
| Response: Changes Suggested, Charges Made | |
| Response: Changes Suggested, No Charges Made | |
| Staff Assistance to Citizen Groups | |
| Consultant Assistance to Citizen Groups | |
| Other | |

45

| STATE | COMMUNITY | Population in Thousands | Cost in Million Dollars | STP (s); Sewers (1); Both (#) | Environmental Impact Statement | Meet With Special Interest Groups | Flyers | Use of News Media in Planning | Public Meetings | Other | Innovations | Citizens Involved Before Decision on Alternative | Meeting Advertised | Minutes or Summaries | Costs Explained | Costs Publicized | Evidence Public Particip. Affected Plan | Explained Environmental Effects | No Effect | Increased Total Cost | Decreased Total Cost | Improved Environmental Quality | Hurt Environmental Quality | Relocated Sewage Treatment Plant | Relocated Sewers | Publicized Beyond Legal Advertising | Attendance at Public Hearing | Issues Raised Affecting Plan | Response: No Effect | Response: Changes Suggested, Changes Made | Response: Changes Suggested, No Changes Made | Staff Assistance to Citizen Groups | Consultant Assistance to Citizen Groups | Other | |
|-------|----------------|-------------------------|-------------------------|-------------------------------|--------------------------------|-----------------------------------|--------|-------------------------------|-----------------|-------|-------------|--|--------------------|----------------------|-----------------|------------------|---|---------------------------------|-----------|----------------------|----------------------|--------------------------------|----------------------------|----------------------------------|------------------|-------------------------------------|------------------------------|------------------------------|---------------------|---|--|------------------------------------|---|-------|---|
| M1 | BOY CITY | 200 | 60 | 1 | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y |
| M1 | BEAR LAKE | 55 | 5 | 1 | N | Y | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | |
| M1 | ECORSE CREEK | 400 | 60 | 1 | Y | N | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | |
| M1 | LINCOLN TWP | 10 | 85 | 1 | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | |
| M1 | OTTOVA CO | 14 | 18 | 1 | N | N | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | |
| M1 | CENTER BT. CO. | 16 | 12 | 1 | N | N | N | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | |
| IL | OGDEN | 05 | 5 | 1 | N | N | N | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | |
| IL | KANKAKEE | 03 | 3 | 1 | N | N | N | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | |
| IL | METCALFE | 03 | 3 | 1 | Y | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | |
| IL | ROCKFORD | 100 | 100 | 1 | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | |
| IL | STURGEON LAKE | 6 | 6 | 1 | Y | Y | Y | N | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | Y | |

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| IX | CZ | LOS ANGELES COUNTY | STATE |
|----|----|--------------------|--|
| IX | AZ | GILA | COMMUNITY |
| IX | AZ | CRANDALL | Population in Thousands |
| IX | NV | LAS VEGAS | Cost in Million Dollars |
| IX | NV | DAYTON | STP (s); Sewers (i); Both (#) |
| IX | NV | SUN VALLEY | Environmental Impact Statement |
| | | | Meet With Special Interest Groups |
| | | | Flyers |
| | | | Use of News Media in Planning |
| | | | Public Meetings |
| | | | Other |
| | | | Innovations |
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Sanitation Agency

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Sanitation Agency