

Herding Cats: The Elusive Nature of Regulating Community Dialogue

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A number of statutes mandate either public involvement in environmental decision making or the public availability of information on environmental performance or potential risk. However, these concepts can be extraordinarily difficult to translate into regulatory requirements. As a result, the importance of a dialogue with stakeholders often goes unexpressed, leaving facility owners or operators, who are focused on regulatory compliance, with little incentive to address community questions or concerns about environmental issues.

This article examines the requirements for public involvement under RCRA's expanded public participation rule as well as the community relations implications of the impending public availability of risk management plans mandated by Section 112(r) of the Clean Air Act. Insights gleaned from the preambles to these two rules, along with other important concepts in community relations, are discussed to shed light on the important process of working with the public.

Working with the public to address concerns about environmental issues is a vital and necessary task, albeit one fraught with paradox and uncertainty. Congress has acknowledged the public's desire to know about and have input into decisions regarding environmental issues by enacting statutory requirements that accommodate this desire. However, despite statutory intent, codifying public involvement is a tough task, given the dynamic and sometimes volatile nature of the public's response to environmental issues.

EPA has essentially taken two routes to implement statutory requirements. Regulations under the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response, Compensation and

Liability Act (CERCLA), for example, prescribe explicit methods for involving the public in decision making. On the other hand, regulations such as those that require reporting of emissions data to the toxics release inventory (TRI) under Title III of the Superfund Amendments and Reauthorization Act (SARA) and, most recently and very notably, regulations requiring the submittal of risk management plans under Section 112(r)(7) of the Clean Air Act, require only reporting and the public availability of information and include no explicit requirements for working with the public. Under these latter regulations, facilities are on their own to determine how best to handle the questions or concerns that can arise from publicly available information.

These two regulatory approaches mirror another set of “either/or” attitudes that community relations specialists frequently encounter among technical and legal personnel: that communicating with the public is no big deal, anyone can do it, and no special preparation is necessary, or conversely, that communicating with the public is a mystical, mysterious process that may or may not work and, because of this, no amount of preparation will help. Both views tend to encourage managers to adhere doggedly to the letter of explicit regulations where they exist, and ignore the need to reach out proactively to initiate dialogues in cases in which regulations require only reporting. Either of these courses of action can lead to disaster in the arena of public perceptions.

This article looks behind the mirror at what some of the regulations and the preambles that accompanied their promulgation tell us about working effectively with the public. It also explores some concepts that will help facility management understand how to engage in effective dialogues about the issues raised by public involvement or the public availability of information.

To gain insights into the concepts and challenges of managing the public dialogue, we will look at two recent and very different regulations. The first, the expanded public participation rule under RCRA, promulgated December 11, 1995, provides some explicit new requirements and valuable insights into factors leading to effective public involvement. The second, the accidental release prevention and risk management program under Section 112(r)(7) of the Clean Air Act, promulgated June 20, 1996, requires only the public availability of reported information. No mention is made within the body of these regulations of the importance of working with the public to supplement this information. Ironically, these regulations are likely to have a much greater impact on the public dialogue than expanded public participation under RCRA, both because of the seriousness of the concerns the information made public may raise and the large number of facilities—estimated at 66,000—that will have to provide information.

Another component of effective community relations is stakeholder empowerment.

There is a dizzying array of terms and definitions associated with the process of working with the stakeholders to address environmental issues. The terms “public involvement” and “public participation” are used in RCRA to refer to the process of involving stakeholders in activities related to permitting actions. “Community relations” is a term commonly encountered in Superfund; the term is also used frequently by both public- and private-sector organizations to describe a wide range of interactions with stakeholders regarding environmental and nonenvironmental issues. The terms “stakeholder involvement,” “community involvement,” and “community outreach” have gained increasing use by persons involved with federal facilities and environmental justice. “Community outreach” is also the preferred term among some industry groups. Many of these terms tend to be used interchangeably.

What all of these terms have in common is the process of communicating with the public and cultivating relationships with stakeholder groups. In order for community relations programs to be effective, the communication must be two-way—it must solicit feedback as well as provide information—and the relationships must engender sufficient trust and understanding to support the communication effort. More often than not, working with the public to explore questions or concerns about environmental issues is akin to herding cats—stakeholders have minds and timetables of their own, and the process needs to be sufficiently flexible and dynamic to accommodate excursions to the left or right (or backwards). Patience and focus are necessary characteristics for persons involved in dialogues with stakeholders.

Another component of effective community relations is stakeholder empowerment. Regulatory requirements that make information available to stakeholders or that provide opportunities for public comment empower stakeholders to participate in public dialogues regarding environmental issues. The empowerment component is very clear in prescribed public

involvement activities (such as public comment periods during RCRA permitting actions). It is less clear in regard to the public availability or disclosure of information. It should be noted that, in some situations, simple public availability of information can have a greater effect on the public dialogue than formal public involvement in decision making.

RCRA EXPANDED PUBLIC PARTICIPATION

Section 7004(b) of RCRA requires EPA “to provide for, encourage, and assist public participation in the development, revision, implementation, and enforcement of any regulation, guideline, information, or program under the Act.” Public participation under RCRA includes requirements at various points in the permitting process to hold public comment periods and issue fact sheets and public notices.

On December 11, 1995, EPA issued a final rule expanding its public participation requirements. The preamble to this final rule provides a succinct explanation of why the RCRA public participation process was expanded:

Many stakeholders have expressed the concern that the current RCRA permitting process does not involve the public at an early stage in the process, does not provide adequate information, and does not provide an equitable opportunity to participate.¹

Provisions for expanded public participation reflect a significant advance in the proactive and meaningful inclusion of stakeholders into the dialogue that accompanies environmental decision making. The rule added a number of requirements under Parts 124 and 270 in Title 40 of the Code of Federal Regulations (40 CFR) and applies to facilities that are undergoing Part B permitting or permit modifications under Subtitle C (permits for facilities that treat, store, or dispose of hazardous wastes). The following paragraphs explore several of the more important changes in the rule.

Pre-Application Public Meeting and Notification

The most notable aspect of the rule involves moving up the timetable for public participation by requiring pre-application notices and meetings with community stakeholders. Under the expanded requirements, a facility must publicize and hold at least one informal public meeting *before* the permit application is submitted to the agency or before renewal of a permit that proposes a significant change in facility operation. The intent of this addition is to allow the public into the process early on, when comments and suggestions are most easily incorporated into the permit application. These front-end activities are the responsibility of owners or operators of facilities, rather than the agency—another significant aspect of the expanded public participation concept.

According to the preamble, the intent of the pre-application meeting is to “solicit questions from the community and inform the community of proposed hazardous waste management activities.”² The facility’s owner or operator must include in the Part B permit application a summary of the meeting, along with the names and addresses of meeting attendees and copies of any written comments or materials submitted at the meeting.

To publicize the pre-application meeting, facilities are required to provide at least 30 days’ advance notice using the following means:

- A display advertisement in a newspaper of general circulation in the county or similar jurisdiction. The agency may also require the facility to place an advertisement in a newspaper serving other jurisdictions if potentially affected persons reside there.
- “A visible and accessible sign” with the notice on or near the facility, in a location that is visible and readable from public access points.
- An announcement that must be broadcast at least once on at least one local radio or television station. Where applicable, another medium may be used with prior approval of the permitting agency’s director.

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These notices must include such information as the date, time, and location of the meeting; a brief description of the purpose of the meeting and of the facility and proposed operations; and the name, address, and telephone number of a contact person for the facility. The rule builds significant flexibility into the notification requirements, allowing them to be tailored in a manner that fits the community. These requirements are about as prescriptive as possible and still acknowledge that the effectiveness of different communication vehicles varies from community to community.

Information Repositories

The expanded public participation rule also requires that information repositories be established in situations in which community stakeholders may not have sufficient access to information about a permit application or facility operations. The need for an information repository is made by the permitting agency's director on a case-by-case basis, depending on such variables as the level of public interest, the type of facility, the presence of an existing repository, and the proximity of the community to the nearest copy of the administrative record. The director can decide at any time after the submittal of a permit application to order the establishment of a repository.

If such a determination is made, the owner or operator of the facility is required to establish and maintain the information repository throughout the time period specified by the director. The information repository must contain all documents, reports, data, and information that the director considers important to fulfill the purposes of the repository. The director also specifies the requirements the facility's owner or operator must meet for notifying the public about the existence of the repository.

Environmental Justice and "Equitable Public Participation"

EPA has attempted to address concerns about environmental justice in RCRA permitting actions through principles of "equitable

public participation," which are embodied in the expansion of public participation. The concept of environmental justice speaks to concerns that minority or low-income populations have been disproportionately affected by environmental degradation. As the preamble states, "insufficient opportunity for communities to become involved in environmental decision-making is a contributing factor to environmental justice concerns."³ The preamble goes on to explain that "today's rule provides all communities with a greater voice in decision making and a stronger opportunity to influence permit decisions early in the process."⁴

EPA had originally proposed to address environmental justice concerns through regulation. However, recognizing that these issues need to be handled at the local level and on a site-specific basis and, thus, were not amenable to a prescriptive approach, EPA instead chose to address environmental justice through guidances and by expanding public participation to encourage greater involvement by all stakeholders.

Behind the Mirror:

Discussion of Important Points

At a minimum, the regulations added under expanded public participation can only require facilities to provide information to the public. The regulations cannot ensure the quality of the communication, or that facility owners or operators gain the types of insights they need to engender a substantive and positive dialogue. Scrutiny of the intent of the regulations as published in the preamble can point facilities in the right direction, however. As this article discusses, there are concepts that, meshed with the regulatory requirements, will help facility owners and operators understand how to work successfully with community stakeholders.

The following paragraphs discuss several aspects of RCRA expanded public participation that provide insight into the factors that can lead to successful interactions with stakeholders.

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Interaction with Stakeholders Early in the Permitting Process

Providing information and a forum for stakeholder questions and input early in the permitting process defuses one of the major sources of public anger and concern regarding the permitting of RCRA facilities—that the community has been “kept in the dark,” and that it is too late in the process for meaningful input into decisions regarding the permit. This criticism can also be applied to situations involving contamination, the harvesting of natural resources, and land use issues. Community relations/public involvement specialists can attest that anger over the belief that a permit is a “done deal” and that stakeholders have not been involved in the process until late in the game can easily eclipse concerns about the actual hazardous waste operation.

Additionally, information about permitting activities and the management of hazardous wastes is frequently unfamiliar to community residents. In order for stakeholders to be able to provide informed input into the permitting process—or to gain a level of familiarity and comfort with these topics—they need to be exposed to information several times. The motto of community relations specialists is to communicate “early and often.” Soliciting frequent community input promotes familiarity and can prevent the anger that accompanies the belief that stakeholders have no real say in the permitting process.

The use of pre-application meetings has the potential in many cases to minimize the contentiousness that can accompany the RCRA permitting process and, thus, minimize both monetary and managerial costs on the facility and agency sides, and emotional (and, not infrequently, social and political) costs on the public side. The “early and often” concept is also vital to managing dialogue about other environmental issues.

Use of Multiple Methods for Communicating with the Public

Not only is it usually necessary to use multiple communication vehicles to reach

most or all community stakeholders, but looking critically at who is likely to be reached by a given medium is itself an important exercise in understanding how the communication process works in a specific community. Effective community relations/public involvement programs typically use several approaches to reach stakeholders—and the specialists who design such programs assess potential approaches to ensure that all stakeholders can be reached. Not only does requiring facilities to use multiple methods for notifying the public of the pre-application meeting likely ensure a greater awareness among community residents than the use of only a single method, it will hopefully encourage the more perceptive facility owners or operators to consider a wide range of possibilities for creating ongoing dialogues with the public.

Greater Mandated Involvement in the Permitting Process by Facility Owners or Operators

Assigning greater responsibility to facility owners or operators for communicating about permitting activities ultimately benefits facility owners or operators by encouraging the establishment of an early and substantive dialogue with community stakeholders—if owners or operators will continue the communication. Any facility having an impact or perceived impact on the environment needs to have open lines of communication with stakeholders. Unfortunately, facility management is often reluctant to make these connections, or makes them only after a crisis or within the context of an adversarial relationship. By requiring facility owners or operators to conduct a pre-application meeting, EPA is providing the initial push that many facility managers need to begin communicating with stakeholders. Hopefully, facility management will recognize the value in continuing the process so that an ongoing dialogue and positive relationships will develop.

Emphasis on Reaching Out to All Stakeholders To Promote Equitable Public Participation

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broader and more inclusive definition of stakeholders and stakeholder involvement. Attempts by both public- and private-sector organizations to ensure that all stakeholder groups—including minority or low-income populations—are included in dialogues about environmental issues has raised the quality of community relations/public involvement programs by encouraging managers who are responsible for such programs to look more closely at communities and the stakeholders within them. The importance and goals of equitable public participation should be embraced by facility owners and operators.

CAA ACCIDENTAL RELEASE PREVENTION AND RISK MANAGEMENT PROGRAM

Although the final rule for the Clean Air Act (CAA) Accidental Release Prevention and Risk Management Program does not address public participation, the public availability of information submitted under this rule is likely to have a much greater effect overall on the public dialogue than RCRA's expanded public participation. These regulations, which were published in the *Federal Register* on June 20, 1996, are based on Section 112(r)(7) of the Clean Air Act. The intent of Section 112(r)(7) is to prevent accidental releases to the air and to mitigate the consequences of such releases by focusing prevention measures on those chemicals that pose the greatest potential risk to the public and the environment.

Reporting Requirements Under Section 112(r)

Under the regulations, facilities that produce, handle, or store certain toxic or flammable chemicals in amounts above threshold quantities must develop and implement risk management programs that include hazard assessments, prevention programs, and emergency response programs. The hazard assessment must include calculations of the potential off-site extents of worst-case and alternative release scenarios and a five-year accident history for the facility. The risk management program must be described in a risk management plan (RMP) that must be sub-

mitted to a central point specified by EPA prior to June 21, 1999. The RMPs will be made available to the public.

As stated in the preamble to the final rule, EPA estimates that approximately 66,000 facilities will be required to submit RMPs. Types of facilities that will have to comply cover a wide range, including chemical and other types of manufacturers, drinking water and wastewater treatment works, food and cold storage facilities, electric and gas utilities, and military installations.

The RMPs will contain information that is likely to raise questions and concerns among some, possibly many, community residents. Types of information that could be quite alarming to residents are highlighted below.

Worst-Case Release Scenarios

The regulations require facilities to calculate the potential off-site extent of worst-case release scenarios. The worst-case release scenario is defined by the regulations as the release of the largest quantity of a regulated substance from a vessel or process line failure. In the case of toxic substances, facilities will use air dispersion models to determine the distance to "endpoints," which, according to the preamble, are based on either the "maximum airborne concentration below which nearly all individuals could be exposed for up to an hour without experiencing or developing irreversible or other serious human health effects or symptoms that could impair their ability to take protective action,"⁵ or some other measure of toxicity. "Endpoints" for flammable substances are based on calculations regarding the force of explosive pressures, radiant heat, and the flammability limits of airborne vapors.

Facilities must report one worst-case release scenario for all flammables and one worst-case release scenario for all toxics. EPA states in the preamble to the rule that the worst-case scenario is designed primarily to support a dialogue between the facility and the community on release prevention, and not to serve as the sole or main focus for local

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emergency planning. EPA believes that worst-case release scenarios will inform the broadest range of individuals that they could be affected by a release from the facility and, thus, encourage them to participate in a dialogue about prevention, preparedness, and emergency response actions. However, this dialogue could get lost in damage control if the facility has not worked with stakeholders before the RMP information is released.

Alternative Release Scenarios

Facilities are also required to identify possible situations (e.g., line failure, loading/unloading) that could lead to alternative release scenarios. An alternative release scenario must be reported in the RMP for each toxic substance held above the threshold quantity at the facility, the release of which could have off-site consequences. One alternative scenario must be reported that represents all flammables held above the threshold. In many cases, we anticipate that alternative release scenarios are likely to lead to significantly more debate than worst-case scenarios, both because they will be viewed as more likely to occur and because facilities are allowed to take credit for both active and passive mitigation when calculating their effects. Some stakeholders will no doubt object to the assumption that mitigation will work while pointing out the greater potential for such releases to occur.

Public and Environmental Receptors

In addition to calculating the potential extent of worst-case and alternative release scenarios, facilities must identify “public receptors” and “environmental receptors” that could be affected by a release. Providing an indication of actual geographic boundaries, even if they only are based on the modeling of a *potential* release under specific atmospheric circumstances, will likely make these data very real to many stakeholders. Thus, community residents will know what areas might fall within the toxic plume—and wonder if the extent has, in fact, been understated.

Five-Year Accident History

Other information that must be included in RMPs that could cause concerns or raise questions is the five-year accident history for substances covered by the rule. The accident history is a double-edged sword that may cut in either direction, depending on stakeholders’ perceptions and their overall opinions or beliefs about a facility or industry in general. To some, the occurrence of past accidents may cause consternation about the competence of facility personnel, while to others it may indicate that the facility knows how to respond and that “accident” does not automatically equal “catastrophe.” On the other hand, a “clean” accident record will satisfy some, while others may mutter darkly that such a record simply means that the facility is “due” for an accident.

Communication Implications of Section 112(r)

Although the regulations themselves do not discuss either the purpose of or the role played by public availability of RMPs, the preamble to the final rule elaborates at length on EPA’s thinking and goals, as these excerpts show:

With today’s rule, EPA continues the philosophy that it embraced in implementing the Emergency Planning and Community Right-To-Know Act of 1986 (EPCRA). Specifically, EPA recognizes that regulatory requirements, by themselves, will not guarantee safety. Instead, EPA believes that information about hazards in the community can and should lead public officials and the general public to work with industry to prevent accidents. . . . EPA intends that officials and the public use this information to understand the chemical hazards in the community and then engage in a dialogue with industry to reduce risk. In this way, accident prevention is focused primarily at the local level where the risk is found.⁶

Alternative release scenarios are likely to lead to significantly more debate than worst-case scenarios.

EPA is still seeking input from stakeholders as it develops the method for submitting RMPs so that this information can be made available to "all interested parties." EPA favors the concept of having the RMPs available electronically and wants to use a standardized format, particularly for certain "data elements" of the RMPs, so that persons who are reviewing the plans will be able to compare RMPs for various sites across the country. The RMP will also include an executive summary that EPA intends, according to the preamble, will provide facilities an opportunity to explain their risk management programs in a manner that will be easy for community residents to read and understand.

The lack of prescriptive communications guidance from EPA related to the RMP rule is understandable but ironic. Understandable, as discussed later in this article, because of each community's strongly individualized need for and flow of information, but ironic because emergency planning and response holds stakes much higher than most types of community relations situations. Some facilities (perhaps many) could face another kind of worst-case scenario: a communications emergency that could be as inflammatory, toxic, and alarming to citizens and as damaging to the facility as a hazardous materials incident. As facilities plan for how they will fulfill the technical requirements of the RMP regulations, they should have in place a parallel community relations plan for analyzing and dealing proactively with potential community reaction to the information contained in the RMP. Beyond simply meeting EPA's logistical intent for the rule to "stimulate dialogue between industry and the public," facilities have a golden opportunity to use thoughtful and proactive RMP communications planning as a catalyst for (1) establishing or improving a level of trust with their communities and (2) creating an integrated information network.

Facilities that choose to take a proactive communications approach to support the information made available under Section 112(r) may want to keep in mind the following considerations.

Facilities that have not engaged in outreach into their communities or suffer from downright hostile relations face a stronger challenge.

Using the RMP Methodology To Design RMP Communication

First, as stated earlier in this article, many people approach communications with one of two mindsets: either that communication is something that "anybody" can do, and therefore is not worthy of the kind of detailed planning and analysis that technical subjects require, or that communication requires some sort of mystical, magical, intuitive faculty that is simply beyond their ken. But in fact, risk management planning and communications planning are not all that dissimilar. Concepts such as risk assessment, preventive measures, mitigation, emergency response, receptors, and exposure pathways have as much to do with how information and community relations are safely managed as they do with how toxic or flammable materials are handled.

Facilities need to assess potential communication hazards by analyzing all the individual groups or types of residents within their community, past relations with these groups, and how each group is likely to react to the information in the RMP. Facilities that have already undertaken proactive community relations—that have conducted community assessments, have advisory boards in place, and have previous records of open and honest conversation with local emergency planning committees (LEPCs), neighboring residents, environmental groups, elected officials, and local media—obviously have a strong leg up. RMP communications can easily become an extension of the dialogue and trust that has already been established.

On the other hand, facilities that have not engaged in outreach into their communities or suffer from downright hostile relations face a stronger challenge. These facilities should be starting *now* to evaluate stakeholder relationships, to educate and inform their communities on the requirements and implications of the RMP regulations, and to work collaboratively with community representatives on the accident prevention and emergency response portions of the RMP. June 21, 1999—the deadline EPA has set for submitting the

RMPs—should hold surprises for no one. Communities ideally should already be aware of what a facility's RMP will contain, and facilities should already be aware of what their communities think about that information.

Communication Regarding RMPs Requires Two Approaches

A second consideration is that there are, in essence, two communication processes at work related to Section 112(r). One centers around the public release of the worst-case scenario information published in the RMP itself; the other around the crisis communication plan that results from the RMP information and that should be in place in the event of an actual emergency. Both are important, but both will occur at different stages. A proactive community education and collaboration effort about the intent and substance of the RMP will pave the way for more effective facility-community teamwork in developing a crisis response and communication plan that really works.

Stakeholders as Conduits and Receptors of Information

The role of stakeholders as not only *receptors* of information, but actual *conduits* for information, is a third consideration. In an emergency situation, controlling information is also like herding cats. People who are panicked or fearful will call anyone and everyone whom they think might be a source of information about an incident. Obviously, the facility itself, emergency responders, the media, and local officials are usually on the front line of such inquiries. However, as hours, days, and weeks pass following an emergency, others can also find themselves being approached as probable sources of information, such as union or worker representatives, members of community advisory boards, nonemergency health care providers, attorneys, environmental groups, state legislators, state environmental or health regulators, and high school or college science teachers. The assumed paradigm behind community relations, such as that

detailed in the RCRA expanded public participation rule, generally calls for the facility or the agency to take primary responsibility for disseminating information. Yet, in an emergency situation, there are many other community sources who also may find themselves called on to play a supporting role. The dialogue on accident prevention and emergency planning envisioned by EPA as part of the risk management planning process offers an opportunity and, perhaps, even a subtly implied mandate to stakeholders themselves to take responsibility as part of an integrated information network. Communicating "early and often" about the development of the RMP can open the door to the formation of such an integrated information network.

RESOLVING THE PARADOX OF HERDING CATS

Community relations specialists who read the preambles to either of the rules discussed will easily recognize and identify with EPA's dilemma in attempting to regulate the public's involvement in environmental issues. In both documents, EPA acknowledges that the best course of action will vary from community to community and that only so much can be prescribed.

Public response to environmental issues is highly situational. Different issues in different communities may lead to very different public reactions, both in terms of the magnitude and extent of concern and in regard to the types of information or interactions stakeholders want or need. For example, it is a mistake to believe that community residents will either behave in an "activist" mode or they won't. As many companies discovered with the advent of the toxics release inventory—and many companies have discovered in regard to spills, contaminated sites, or attempts to permit landfills or incinerators—"average" community residents may adopt activist behaviors if they believe that their health or property values are imperiled.

Ultimately, the probability of a successful outcome rests on how well those charged with working with the public "read" the commu-

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nity. Community relations specialists use a process called community assessment to perform a systematic examination of the social, political, and economic issues and dynamics in a community to determine how best to reach out to stakeholder groups using methods that will encourage feedback and provide the information they want or need to receive. Properly performed, the assessment process provides a comprehensive view of the community that enables a facility to make the following key determinations necessary to establish a substantive dialogue:

- Who are *all* of the stakeholders in this community and how do they interact? What issues interest or concern them, and how do they want to be involved in the community relations process regarding this specific issue? Stakeholders include persons or groups who *perceive* that they are affected as well as those who actually may be affected. It is also very important to determine the *perceived* geographic extent of interest or concern, as this will vary from area to area, and from issue to issue.
- How do we need to communicate with stakeholder groups? What are their preferences and usual methods for communicating about important issues? Do we need to use different methods to reach different groups? If the community relations effort involves an issue, such as an RMP that may affect more than one community, do we need to use different methods of communication in each community? After all, in community relations, one size *does not* fit all.

- What are the other sensitivities, issues, or concerns that will influence how stakeholders react to messages about the issue in question? Other environmental issues, such as incidents at other facilities, will invariably color stakeholder perceptions in a way that must be considered when designing messages. Other community issues, such as the nearby development of property or heated political battles, may also have an effect on the community relations process.

Community assessments provide insight into the *context* in which specific environmental issues will be viewed. Such information will allow a community relations specialist to design a targeted approach to working with stakeholders that is appropriate to the community.

As stated at the beginning of this article, working with the public is fraught with paradox. Achieving a successful dialogue with stakeholders is both as simple and as complex as knowing the community. The rich and complex dynamic of community dialogue, which eludes and defies prescriptive regulation, can be remarkably productive when facility managers know who they are talking to, what their concerns are, and how they want to be involved.

NOTES

1. 60 Fed. Reg. 63418.
2. 60 Fed. Reg. 63422.
3. *Id.*
4. *Id.*
5. 61 Fed. Reg. 31685.
6. 61 Fed. Reg. 31669-31670.

The community assessment process and community relations program planning and implementation are covered in detail in a new book, *The Practical Guide to Environmental Community Relations*, coauthored by Carol J. Forrest and Renee Hix Mays and published by John Wiley & Sons, Inc., 1-800-225-5945. *The Practical Guide* offers a comprehensive hands-on framework for working successfully with community residents and other stakeholders to prevent, resolve, or minimize conflicts about environmental issues. In addition to covering the community assessment process and community relations program development, the book includes chapters on communication, community relations techniques, regulatory requirements, and cutting-edge issues, such as environmental justice.

Carol J. Forrest and **Stephanie J. Reith** have collaborated on community assessments and community relations program design. Ms. Forrest is president of Equinox Environmental Consultants, Ltd., of Wheaton, Illinois. She specializes in community relations and environmental communication and has worked on projects for public- and private-sector clients throughout the United States. She is coauthor of the recently released book, *The Practical Guide to Environmental Community Relations*, published by John Wiley & Sons, Inc. She also teaches community relations/public involvement and business strategy concepts in a graduate-level course in the environmental management program at the Illinois Institute of Technology's Stuart School of Business. Ms. Reith is Senior Community Relations Manager for the consulting firm Rust Environment and Infrastructure in its Chicago area office. She has more than 20 years of communication experience, ten of that specifically in environmental community relations and group facilitation. She has designed and managed more than 50 community relations programs in 16 states for, among others, the U.S. EPA Superfund Program, the Department of Defense Installation Restoration Program, private industry, and local municipalities and utilities. She has won several awards for her writing and publishing activity and is author of a set of communication analysis worksheets that aid clients in identifying and evaluating audiences, messages, and communication methods and pathways.