USEPA Comments on the Navy's Communications Plan, Version 1.5, February, 2017

The EPA appreciates the Navy's approach to promoting a two-way communication process while conducting the Tetra Tech, EC, Inc. sampling data investigation at the Hunters Point Naval Shipyard Superfund site (HPNS). The February 8 Navy Open House event solidified that the level of community interest about this issue is high. The Radiological Communication Plan should reflect best practices learned from each event to enhance future activities. In addition, EPA would like the Navy to include in this plan how they plan to introduce the new hired community's technical advisor and communication liaison to the public. EPA has included suggestions on how we would do this process with the general comments.

EPA's general comments are below and specific comments are within the attached tracked Word file.

General Comments:

EPA suggests that the Navy use language in this document that promotes community involvement as an ongoing two-way dialogue, as opposed to only explaining its outreach efforts. To do this, the Navy should incorporate how it has already and will continue to exchange information with interested stakeholders. The document also should explain how the Navy plans to receive and use feedback from the public in its effort to promote a two-way communication process and how it plans to share this information with the public-at-large.

Overview, Purpose, and Approach

EPA suggests explaining the purpose of document after the overview section. This way the document will flow from a big picture view to more specific planned tasks that will be executed. The overview portion should include either a chronological narrative or timeline of events to give a clear picture of how the investigations now requires a more in depth evaluation.

Key Messages:

Please update the Key Messages to be consistent with what Dr. Covello developed with the Tiger Team for the public and media.

Stakeholder

The first paragraph discusses the Navy's distribution lists. It should explain who the stakeholders are, their main concerns, what information is critical to them in this process, and how they best like to receive and give information. The external stakeholders table needs an added column that explains what type of information they should receive and what communication method should be used.

Technical Advisor and Community Liaison Introduction and Activities:

EPA appreciates the proactive approach to quickly bring on a radiation expert as a community technical advisor, and having Dr. Higley attend the February 8, 2017, Open House as a resource.

It is imperative that the Navy include in this plan objectives and tasks a process to help introduce her and the community liaison to the community.

In EPA and DTSC's detailed CI recommendations, we asked that once these positions were filled, as a team they would begin attending established Bayview groups to develop relationships, explain their roles, gather pertinent concerns, and let the community know how they can assist them through the data investigation process. If EPA were doing this community involvement activity, we would expect the following: The Technical Advisor (TA) and Community Liaison (CL) should do the following:

1. Research and learn about the Shipyard and community history and concerns, have a working knowledge of the cleanup status to date, be able to explain progress of the radiological data investigation, and listen to stakeholders voice their concerns.

2. Attend both the technical and community involvement bi-monthly calls to be well informed of progress and provide the team with community feedback.

3. Update the 2014 Community Involvement Plan's list of established Bayview groups that meet regularly and a list of community leaders that should be contacted.

4. Work with the risk communication specialist to develop a set of short talking points to introduce themselves by phone, at meetings as a guest observer, and presenting at established Bayview meetings.

5. Develop a one-page introduction fact sheet. This should include information such as roles, responsibilities, specific activities and resource they can do for the community, add contact information/office hours.

6. Develop a set of FAQs that includes a running list of answers to community questions and be prepared to share information with the team and develop a feedback loop to address those concerns.

7. Call leaders of established Bayview groups to get on their meeting agendas and/or to let them know they plan to attend their meetings.

8. Call community leaders to schedule a "meet and greet" opportunity at their office or at places of convenience. Note: It is-imperative that this two-person team, with the Navy, engage the Environmental Justice (EJ) Task Force leaders to develop trust by scheduling facilitated meetings for updates or attending the Task Force monthly meetings to give updates and discuss concerns. Prior to these types of meetings, it will help to share releasable technical deliverables.

9. Debrief the Tiger Team after meetings and continue to add to the formal FAQs for the investigations. The Community Liaison should keep track of concerns, address them, and record them in a feedback log. The Technical Advisor should review and comment on technical deliverables for the public, keeping in mind the most prevalent concerns of the community when doing so.

Next Public Meeting and Media Process:

Conduct facilitated pre-meetings with most concerned groups to address their issues prior to main meeting.

An embargoed interview should be conducted the day before the Navy public meeting with the CAC to address progress on the investigation and what will be presented at the meeting.

Many reporters may need much faster responses than the Navy stated standard of 14-day turnaround. Otherwise the Navy's messages may not arrive in time to appear in an article.