

## VI. INTERAGENCY COORDINATION

In this section, we discuss mechanisms that facilitate conflict anticipation and avoidance among the federal, state, and local agencies of government, and those that foster the resolution of problems among agencies at all levels.

One of the criteria used to select cases for this study was that at least two federal agencies were involved in a cooperative way at the site, and that, in addition, they were active in community participation efforts. In all but one of the communities included in our study, ATSDR was involved with either EPA, DOE, or both. Two cases involved ATSDR, DOE and EPA, and one involved only EPA and DOE. Table 6-1 lists the federal, state, and local government participants in the seven sites studied.

**Table 6-1: Agency Involvement at the Sites**

	<b>Federal</b>	<b>State</b>	<b>Local</b>
<b>Bartlesville</b>	ATSDR + EPA	ODEQ + OSDH	City of Bartlesville
<b>Saltville</b>	ATSDR+ EPA	VDEQ	Town of Saltville
<b>Chattanooga</b>	ATSDR + EPA + TVA	TN DHE	
<b>South Valley, Albuquerque</b>	ATSDR + EPA	Groundwater Bureau Superfund Section UST Program	City of Albuquerque Departments of Public Works and Environmental Health
<b>Sandia, Albuquerque</b>	DOE + EPA	NMED	Bernallilo County Health Department
<b>Rocky Flats</b>	ATSDR + DOE + EPA	CDPHE	City and County Governments
<b>St. Louis</b>	ATSDR + DOE + EPA	MO DNR + MO DOH	City and County Governments

Inevitably, there are always several governmental agencies involved in contaminated communities, even if the federal involvement is limited to one agency. State and local governments are frequently important actors. ATSDR, one of the sponsors of the present study, has made a particular effort to formalize its relationships with state and county health departments through grants for health assessments and studies at contaminated sites. ATSDR has also worked closely with the National Association of

County and City Health Officials (NACCHO) through a series of workshops and meetings to develop a common vision concerning public involvement [ATSDR/NACCHO 1996; Cole, 1996]. In contrast, EPA operates at contaminated sites through its regional offices and does not usually delegate responsibility for studies or assessments to state departments of environmental protection, although many of these are state agencies are active at the sites, often precedent to federal involvement. The DOE similarly utilizes its regional offices but also engages independent contractors at the sites. DOE was involved at three of our cases and necessarily interacted with state and local government more than EPA because of its direct role in cleanup activities.

The complex pattern of multi-agency and multi-level involvement is both a source of confusion for the community, as well as an opportunity for interagency coordination, cooperation, and synergy. All agencies have developed similar protocols for community participation, but coordination efforts with other agencies reflect ad hoc and unsystematic approaches, depending on the particular history and dynamics of the site. This is not to say that coordination did not occur in the absence of well-thought out plans, but rather that more thought and planning about this aspect vis-a-vis public participation efforts might have led to even greater success. EPA and ATSDR have complementary roles as defined by Superfund legislation, but no guidance is given on their interactions for public participation or environmental justice activities.

In earlier work at MIT [Ashford et al., 1991], we identified several generic mechanisms that we thought might enhance interagency coordination:

- 1) Designated person(s) for interagency coordination at all levels of government
- 2) Federal Interagency working groups
- 3) State or local interagency working groups
- 4) Multi-level interagency working groups
- 5) Establishment of formal administrative protocols for coordination

Experience from the cases in the current study reinforces the importance and potential value of these generic mechanisms.

The fourth type of generic mechanism (multi-level interagency working groups) was used in Bartlesville, where two state agencies (ODEQ and OSDH) and two federal agencies (EPA and ATSDR) formed an Interagency Task Force to: (1) address recommendations stemming from the ATSDR health consultation; (2) coordinate related activities; and (3) divide responsibilities for specific projects, e.g., soil testing, blood-lead screening of West Side children, and coordination of agency public involvement activities. By careful attention to the delegation and assumption of different responsibilities across the federal-state divide, the Task Force was able to more quickly

accomplish activities important to the community. Moreover, a cross-agency focus on community involvement activities provided a bridge to interagency cooperation on a host of issues related to the site. Staff members from all four agencies were enthusiastic about the level of interagency cooperation that emerged from the Task Force, which provided a structured process for interagency communication and conflict avoidance. Most importantly, the cooperation engendered by the Task Force fostered an ability for the agencies to support each other and stand together in the face of strong opposition to cleanup by some of the more powerful sectors on the community.

The same type of mechanism was used successfully in Saltville, where the Saltville Team, consisting of representatives from ATSDR, EPA, and the state environmental agency (VDEQ) created a joint decision-making process for the agencies and coordinated communication and citizen participation in the cleanup of both NPL and non-NPL sites in the town through public meetings. The Team met monthly and made all decisions by consensus. The Team had decision-making authority and their decisions were not second-guessed or reversed by their agencies. This helped enhance accountability and credibility with the local community.

In Chattanooga, while state and local government cooperated successfully through the Chattanooga Creek Task Force (the third type of generic mechanism listed above) for the limited purpose of providing local residents with information about a TVA study of contamination in the creek, the federal agencies (ATSDR and EPA) interacted with each other and with the state and local authorities on a more informal basis. The informal communication and cooperation activities were considered successful by the agencies, and community residents did not voice confusion about the activities of the different agencies.

At the South Valley site in Albuquerque, a variety of initiatives contributed to the success of public participation efforts, including a TAG grant, a structured committee (the Design Review Committee) established by EPA to discuss cleanup strategies, and an intensive public forum (the Summit). It was not due to *federal* interagency cooperation efforts, which operated only informally in the San Jose community at the time of the study. For example, at least five federal agencies (DOE, EPA, ATSDR, DOD, and SBA) participated in the Summit. There were, however, more formal state and local interagency efforts. The Design Review Committee involved representatives from four state and local regulatory agencies, numerous PRPs, and a well-respected and active community organization, the San Jose Community Awareness Council.

At the Sandia site in Albuquerque, the technology transfer program created between DOE and Bernalillo County Health Department (a single federal agency-single local agency example of interagency cooperation) was important for local capacity building and should be regarded as a successful multilevel interagency cooperative effort.

At Rocky Flats, arguably the most complex of the sites in the study, two activities relevant to interagency coordination are worthy of note. The Public Participation Focus

Group (P2) was convened by a local public participation mechanisms (the Rocky Flats Local Impacts Initiative/RFLII) and several federal and state agencies to coordinate public involvement activities and to design a strategy to integrate public concerns and priorities into all the activities at Rocky Flats. P2 was composed of community relations professionals from the EPA, CDPHE, and DOE and its primary contractor (an example of a type four generic mechanism), as well as members of the CAB and RFLII. It is an interesting approach to interagency cooperation, in that it includes representatives from two of the more active community-based public involvement mechanisms. It is reported that the group's efforts to coordinate public involvement activities in Rocky Flats have been recognized and appreciated by the stakeholders.

The DOE, EPA, and CDPHE implemented the interagency Quality Action Team (a type four generic mechanism) to help them work cooperatively to regulate and cleanup Rocky Flats. The agencies collectively developed 22 principles to guide their negotiation process, including setting priorities based on risk, public involvement, economic development, waste storage, and improved/streamlined cleanup. This group sought to develop a comprehensive regulatory agreement, the final details of which were put into place at a meeting also attended by officials from the office of the Governor and the Lt. Governor, the site contractor, and the Defense Facilities Safety Board. The group developed a written consensus proposal of a conceptual vision for the future of Rocky Flats, which set goals for cleanup and closure activities.<sup>1</sup> The group also determined that enhanced interagency cooperation could help achieve more results with the available resources. To this end, they established a multi-agency group to evaluate alternative cleanup standards and provide a single regulator and/or single set of consistent requirements over particular activities at the site.

In St. Louis, local officials established the St. Louis County Municipal League Select Committee on Radioactive Waste to enable a more effective translation of their collective municipal interests into political pressure. The group included two dozen elected state, municipal, and county officials, as well as an environmental activist and a representative from the DOE (this should probably be considered a type three generic mechanism because DOE did not have a major voice on the committee). They engaged in a variety of political and lobbying activities to express, with a united voice, the municipalities' strong opposition to the DOE consolidation proposal.

In addition to reinforcing the value of interagency coordination through a variety of generic mechanisms, more particularized lessons emerge from the site investigations.

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<sup>1</sup> As described elsewhere, this interagency vision statement generated considerable displeasure in the community. Despite these problems, the effort to develop a comprehensive interagency agreement on how to handle a complex site is commendable.

! By working together, agencies accomplish some tasks more efficiently. In Bartlesville, for example, ATSDR funded the state to do the blood lead studies, eliminating the necessity of having to go through its own peer review process before results could be released.

! An agency can use its credibility with the affected community to build credibility of other historically mistrusted agencies.

! Public participation activities can be the impetus for interagency cooperation on a host of issues related to the site.

It is not a surprise that a more deliberate commitment to agency coordination can facilitate time and cost savings. What may not have been fully appreciated is that increases in interagency coordination can result *in*, or result *from*, an agency commitment to increased public involvement. Regarding the last point, some of the issues and lessons discussed in Section V on enhancing public participation also have direct bearing on agency coordination issues.

For example, from St. Louis, we learn that public meetings perceived as too tightly controlled by agency representatives result in the public feeling insulted and disrespected. More coordination between agencies -- especially federal and local agencies -- may foster a more sharing (and less controlling) attitude on the part of federal agency participants towards local agencies and community residents who participate in these meetings.

From Rocky Flats, we see the value of participatory mechanisms that create opportunities for local government officials and community members to work together. Such opportunities may be enhanced by coordinated efforts of federal and local agencies in the context of federally-lead, but not dominated, public involvement activities. Rocky Flats also suggests that the credibility of any citizen participation process is undermined when agencies do not explain why the public's input, suggestions, or recommendations have not been accepted or incorporated into the agency's decisions. Increased interagency coordination may help diminish the chance that a particular agency -- especially the lead agency -- at a site appears to or has actually disregarded the public's concerns. Other agency partners involved in coordination efforts may serve as a check on this undesirable result.

On the issue of *which* agency personnel should participate in community-government activities, lessons from Sandia, Chattanooga, and Saltville are instructive and have implications for interagency coordination. From these communities, we learn:

! The appointment an agency person as public participation coordinator or community liaison does not signal a real agency-community partnership.

! When agencies send only lower level personnel to public meetings, agency interest in and commitment to the public participation process and to shared decision-making is seen as highly questionable.

! It is important that agency people who are in the position to make or influence decisions participate in public participation activities and events. It is not sufficient to relegate these activities to public relations or community involvement staff.

! Interagency coordination and cooperation, while good in itself, is not an adequate substitute for public participation.

All these observations from the cases suggest that higher-level agency personnel should be involved in both interagency coordination *and* in public involvement activities. In this way, a *coordinated* public participation initiative can develop. This reinforces a valuable lesson from the Sandia site, i.e., that agencies need to train their own bureaucrats in the value and use of public participation. Further, these lessons suggest that training agency personnel in interagency coordination skills and strategies at the same time might also be well-advised and beneficial. After all, interagency coordination and public participation are conceptually linked through the principle of *maximum involvement of the major actors*.