

Anacostia River Sediment Project- Community Involvement Plan (February 12, 2014)

Number	Commenter/ Representative	Organization	Type	Section/Table/Figure Nos.	Page No.	Comment	Response
1	Brian Flahaven	ANC6B	Governmental	General	General	We were surprised, however, that ANC 6B was not listed as a key stakeholder in the CIP, particularly since a sizeable portion of the study area borders our commission area. We ask that our commission be added to the stakeholder list and that DDOE engage and update ANC 6B and our constituents as the project moves forward.	Thank you for this comment. We will add ANC 6B to the stakeholder list.
2	Brian Flahaven	ANC6B	Governmental	General	General	we urge DDOE to provide our commission, the public and other key stakeholders an opportunity to weigh in and ask questions at each stage of this project. This could be done by providing updates on a regular basis, asking our commission and others to comment on specific remedies or proposals and/or holding periodic community meetings as each phase of the project is completed.	DDOE has and will continue to provide opportunities for the public to weigh in and ask questions at each stage of this project. In the future, DDOE plans on having meetings in every ward in the District.
3	Irv Sheffey		Resident	General	General	I'd like to suggest that the public meetings (noted on p. 9) be held at a site in each of the four primary Wards (5, 6, 7 & 8) rather than limited to the Department of Employment Services building on Minnesota Avenue NE (Ward 7). I would think that DDOE has a list of potential Metro accessible meeting sites but perhaps the following could host such sessions: Ward 5 - Brooks Mansion near the Brookland/CUA Metro stop Ward 6 - Southeast Library near the Eastern Market Metro stop Ward 7 - DOES, as already planned, near the Minnesota Avenue Metro stop Ward 8 - Thurgood Marshall Academy/Savoy Elementary School near the Anacostia Metro stop.	DDOE has and will continue to provide opportunities for the public to weigh in and ask questions at each stage of this project. In the future, DDOE plans on having meetings in every ward in the District. We will contact each of the locations listed to schedule meetings.
4	Irv Sheffey		Resident	General	General	Once these meetings have been scheduled, how do we get people to actually attend? Environmental issues, though important to me, are not always the top priority of the public as a whole. I have found that two motivators might get people's attention, concern and/or hope. On the concern end of the spectrum, tying public health to an environmental issue can get that attention and attendance at a meeting. People come out to learn more about what's possibly facing them. Though we don't want to be alarmist, owning that the river is impaired and can affect a person's health if they swim or eat fish from it, might prompt attendance. The second motivator is hope. Emphasizing what is possible in a restored river, i.e. hope, is the flip side of concern. That in attending such meetings we can actually begin to return the Anacostia to a viable, healthy river where families can boat, swim and fish safely. That their involvement can actually make a difference. Such an expectation has to be backed up with concrete action and results, which I hope the overall sediment project will accomplish, or we will alienate people's future engagement in this and other environmental initiatives.	The Community Involvement Plan already includes discussion tying public health to the river and at the same time giving hope to residents to restore the river.
5	Irv Sheffey		Resident	General	General	It might serve this project to host a focus group very early in the process, on just that topic: "What motivates you to get involved". Answers to that question would go a long way not only for this project but all future outreach efforts.	DDOE has performed or is performing one-on-one interviews and surveys to interested stakeholders asking pointed questions in an attempt to get the public more involved with the project.
6	Irv Sheffey		Resident	General	General	We need to combine online communication with older, tried and true methods like flyers, door knockers, PSAs on radio and telephone calls. Distribution of flyers and door knockers will require a team of people going out into the community, perhaps at local Metro stops, supermarkets and shopping centers to hand out notices about meetings and the like. That same team could hang notices door to door in a given community, helping to assure that neighbors are aware of an upcoming meeting. Other, old tried and true method is post cards and self-mailers.	DDOE is mailing save-the-dates for their June 17 public meeting to over 20-thousand residents. In addition to communicating to the public via e-mail and other online communications, DDOE plans on communicating with the public on project events via other medias..
7	Irv Sheffey		Resident	General	General	We should record Public Service Announcements (PSA) on radio (and television) to get the word out. I am by no means a master of social media, but Twitter, Facebook and similar products/services can reach people, especially a younger demographic, that traditional email might not. Many people have smart phones that would allow them to access to information sent via these means. Even those have limits, since their effectiveness is often based on having a following. We should begin looking at how we can build such a base.	DDOE is mailing save-the-dates for their June 17 public meeting to over 20-thousand residents. In addition to communicating to the public via e-mail and other online communications, DDOE plans on communicating with the public on project events via other medias.
8	Irv Sheffey		Resident	General	General	In mentioning the PEPSCO CAG, I strongly suggest that a multi-tiered, estuary-wide CAG be formed as early as possible. I would create a CAG for each of the affected Wards (tier 1) and have the leadership of each of those respective CAGs (tier 2)	Thank you for this comment. We will take the suggestion of a CAG under advisement.
9	Irv Sheffey		Resident	General	General	The simple fact that a meeting is scheduled for a certain date, time and place is not enough. We need to entice that person to come out. We need to borrow from the advertising, public relations and marketing worlds to find "sexy" ways to accomplish just that.	DDOE has community and public relations specialist, who specialize in enticing the public to participate in decision making. DDOE will make use of marketing strategies as the pertinent information becomes available.
10	Irv Sheffey		Resident	General	General	If libraries are going to be used, all communication, on and off-line, must inform people as to where and how to get access to those materials. The current list of repositories is too limited. Every library and especially those in Wards 5, 6, 7 and 8 should have copies. Perhaps the District can request that each library reserve a section of their community bulletin boards to highlight that there are public notices for the patron's attention and to contact the local librarian for access.	DDOE will continue to use Francis A. Gregory Neighborhood Library and Rosedale Neighborhood Library as repositories for major project documents, such as the Remedial Investigation Work Plan and the Community Involvement Plan. All computers with an internet connection, including publicly accessible computers at the library, have access to the DDOE website, which provides links to relevant documents and the administrative record file, which includes all relevant documents considered during DDOE's project. Furthermore, DDOE plans on making the resources available and possibly expanding dissemination to other libraries.

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11	Lori Baranoff	Anacostia Watershed Society	Non-Governmental Organization	General	General	Could you please share with us how DDOE is reaching out to and engaging the communities before the comment period deadline for the CIP?	DDOE has participated in public meetings discussing the Anacostia River Sediment Project. Additionally, the exact purpose of making the CIP available for public comment is to reach out and engage communities before the comment period deadline for the CIP.
12	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Section 1	3	"DDOE will make a concerted effort to inform and involve the public regularly in all phases of the project." The key words here are "all phases." We believe more effort should have been made by DDOE to engage the public during the comment period for the draft RI Work Plan by actively seeking input, which requires using more than one method to reach out to communities. Though the draft Work Plan is a technical document, reaching out to and meeting with community groups (including by hosting a community-focused meeting) at that time would have helped many more community members and leaders become aware of the Project and involved from the start, a concept that EPA Superfund projects aim to achieve (see references in letter). This is why when we discovered that DDOE was not going to host a public meeting for affected communities, we in partnership with other members of United for a Healthy Anacostia River coalition took action and hosted a meeting on February 26, 2014. While we appreciate that DDOE representatives were present to answer questions from the audience, we believe DDOE should have hosted its own meeting.	DDOE wants to keep District residents as informed and as involved as possible with the Anacostia River sediment project. Certainly, not every resident knows about this project, but we have been working to keep the community informed. DDOE participated in multiple meetings in public settings, including an ANC 6D and 6B monthly meeting, meetings with local environmental organizations, one-on-one interviews with members of the public, and received input from over 60 local environmental entities via an project survey. This is not to mention the outreach DDOE has done for the June 17 public meeting, including an e-mail blast to over 60,000 addresses and hard-copy mailing to over 20-thousand residents, and public comments on our remedial investigation work plan and community involvement plan. Moving forward, DDOE plans to have meetings in every ward, where we will communicate project-related information.
13	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Section 1	3	Another missed opportunity to reach out to community groups for input was before and after the release of the CIP. From people we have talked to about this Project over the last several weeks (over the course of both comment periods for the draft Work Plan and CIP), many did not know about it and expressed concern that more action was not taken by DDOE to reach out to them. Our email to DDOE on March 6, 2014 asking how representatives would reach out to communities before the comment period deadline for the CIP (See full message in the enclosed file titled 'Anacostia Watershed Society Mail - Community Engagement for Sediment Project CIP') did not receive a response. We also are not aware of anyone or any organization notified of DDOE's decision to extend the comment deadline for the draft Work Plan. Had we known, we would have continued to promote comment submissions.	DDOE wants to keep District residents as informed and as involved as possible with the Anacostia River sediment project. Certainly, not every resident knows about this project, but we have been working to keep the community informed. DDOE participated in multiple meetings in public settings, including an ANC 6D and 6B monthly meeting, meetings with local environmental organizations, one-on-one interviews with members of the public, and received input from over 60 local environmental entities via an project survey. This is not to mention the outreach DDOE has done for the June 17 public meeting, including an e-mail blast to over 60,000 addresses and hard-copy mailing to over 20-thousand residents, and public comments on our remedial investigation work plan and community involvement plan. Moving forward, DDOE plans to have meetings in every ward, where we will communicate project-related information.
14	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Glossary	13	The definition of a Community Advisory Group (CAG) is provided in the glossary of the CIP, but there is no mention of a CAG in the body of the plan. We recommend that DDOE form or assist in the formation of a CAG for this project to help a diverse group of community representatives stay informed and in regular communication. The EPA not only encourages CAGs for Superfund projects because there have been numerous success stories, but it also provides administrative support for some of the sites (see references in enclosed letter). If there is concern about community interest when deciding on whether or not a CAG should be convened, the community and key stakeholder interviews provide an opportunity for DDOE to gauge that level of interested in such a committee; after all, DDOE should make sure community groups are aware of community assistance mechanisms like this. There is currently an active and well organized CAG in DC for the Pepco Benning Road RI/FS, of which we are a member. Some of the other members have expressed their appreciation for this opportunity and believe it would be a good mechanism to use for this Project as well. The two people DDOE has identified to coordinate community engagement could assist in the formation of a CAG	Thank you for this comment. We will take the suggestion of a CAG under advisement. DDOE wants to keep the public involved as much as possible with this project.
15	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Section 1	3	We appreciate that DDOE can update or revise the CIP as needed. We urge that this be done and that public notice be provided (using a mix of methods described above) for important content changes, and that this is included in the CIP.	DDOE will revise the CIP according to formal and informal public comments on the CIP and other project-related activities.
16	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Section 3	7	We recommend that the schedule of activities be updated periodically to reflect when certain milestones have been achieved or complete and that DDOE note this in the CIP and provide public notice when such changes are made.	DDOE will periodically update the CIP as certain milestones are achieved. All updates related to this project will be noted on the DDOE website.
17	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization			It was a missed opportunity to not hold a "Kick-off Community Meeting" during the comment period for the draft Work Plan or for the release of the CIP, especially after we expressed several times before the release of these documents that community engagement is important and that the affected communities should be involved from the start of this process.	DDOE wants to keep District residents as informed and as involved as possible with the Anacostia River sediment project. Certainly, not every resident knows about this project, but we have been working to keep the community informed. DDOE participated in multiple meetings in public settings, including an ANC 6D and 6B monthly meeting, meetings with local environmental organizations, one-on-one interviews with members of the public, and received input from over 60 local environmental entities via an project survey. This is not to mention the outreach DDOE has done for the June 17 public meeting, including an e-mail blast to over 60,000 addresses and hard-copy mailing to over 20-thousand residents, and public comments on our remedial investigation work plan and community involvement plan. Moving forward, DDOE plans to have meetings in every ward, where we will communicate project-related information.
18	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization			The only other comment period left for the public after the CIP as listed on this schedule is for the Proposed Plan. Per CERCLA and National Oil and Hazardous Substances Contingency Plan (NCP), we recommend that opportunities for public comment also be given for: Remedial Actions [NCP, at 40 CFR § 300.415(n)(2)(ii) or (iii)];5; this is listed under the Activity column. It should also be made known in the CIP that comment periods will be given if: Consent Decrees are entered [CERCLA Section 122(d)(2)(B)]6 [NCP, at 40 CFR § 300.430(c)(5)(ii)]5, and A Revised Proposed Plan is needed [NCP, at 40 CFR § 300.430(f)(3)(ii)(B)]5 (See references in enclosed letter)	DDOE is conducting this project according to the federal law that governs this cleanup, commonly known as the Comprehensive Environmental Response, Compensation, and Liability Act or CERCLA for short. Additionally, we are following CERCLA's implementing regulations and the District's own cleanup authority. As this is the case, DDOE will provide, at the least, public comment periods during the legally prescribed stages of this project.

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19	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization			We also recommend a public meeting be held by DDOE after the release of the Record of Decision and when milestones are achieved during the Remedial Design and Remedial Action phases of the process in order to provide updates to the community.	DDOE will keep District residents as informed and involved as possible with the Anacostia River sediment project. Moving forward, DDOE plans to have meetings in every ward, where we will communicate project-related information. Additionally, DDOE plans on holding public meetings in the future after the release of major project documents. Specifically, the Proposed Plan, which issued before the record of decision, is subject to public comment and review, and a public hearing on the plan is required.
20	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	General	General	We recommend including the following information (Issues and Concerns section of CIP, page 5), to acknowledge that there have been concerns in the past regarding toxics projects, with explanations of DDOE's plans to address them in this process:	See below.
21	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization			Community concerns regarding the Superfund process include a desire and need: <ul style="list-style-type: none"> • For basic information, • For independent technical assistance when necessary so that all interested can fully understand results of the investigation, • To be heard on all things related to the process, and • For all input from the community to be seriously considered before decisions are made. 	<ol style="list-style-type: none"> 1) DDOE has and will continue to give basic project information to the public. 2) Public comments, including those from organizations independent from DDOE (NOAA, NPS, Earthjustice, and others) have given Public comments on the remedial investigation work plan and others have commented on the Community Involvement Plan. 3) DDOE wants to keep District residents as informed and as involved as possible with the Anacostia River sediment project. Moving forward, DDOE plans to have meetings in every ward, where we will communicate project-related information. 4) DDOE will consider meritorious comments before project decisions are made.
22	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization			The following are past concerns expressed by members of the community regarding the Superfund process that are quite relevant to this Project. The community wants: <ul style="list-style-type: none"> • A clear explanation of its role and responsibilities in DDOE's decision-making process; (Guidelines on the aspects of the Project in which community members have influence be provided and made clear.) • A process that is transparent; (Transparency means that the public can easily obtain information about the District's decision-making on the project and that all aspects of decision-making are understandable to the public. Providing adequate information alleviates perceptions that aspects of the project are being concealed.) • All efforts be made to properly identify any and all responsible parties for contaminants in the river and to hold those parties accountable for cleaning up the contamination; • A process that is meaningful; (DDOE's involvement must focus attention on tasks and issues in which public input will have a tangible influence on future decisions. DDOE must follow through on commitments made.) • To be adequately supported, especially with key information; (Participants need to be informed in a timely manner about issues, meetings, and upcoming decisions so they can prepare for participation. Participant information (written in plain language) that is provided early enough to be assimilated and used in the community involvement process. In addition, time considered before final decisions are made.) • A process responsive to the needs of all involved; (Members of the public want assurance that DDOE values their input. The process must include feedback to stakeholders about how their input was decisions made by DDOE.) 	<ol style="list-style-type: none"> 1) We will take this comment under advisement and will consider including a portion on the public's role in DDOE's decision-making process related to this project. 2) DDOE will make this project as transparent as possible, which includes taking public comments on draft documents such as this Community Involvement Plan, and making all relevant project documents available for the public to view in the administrative record file. 3) Those responsible for the pollution will be held responsible, but right now we are studying the nature and extent of river contamination. The assessment of parties' liability is not done at this stage; we will assess the liability of potentially responsible parties at a later point in this project. 4-6) See response to comment 17.
23	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Section 1	5	<ul style="list-style-type: none"> • A process that is flexible; (The process should include a wide variety of approaches and strategies for involvement. DDOE should evaluate its participation efforts throughout needed.) • A process that is inclusive and allows for the formation of a well-represented Community Advisory Group. (The process must involve a broad and representative range of interests. Broad participation increases the legitimacy of decisions that are made.) 	See response to comment 8 and 17.
24	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization			Community members have expressed concerns about the short- and long-term impacts of the resulting cleanup of the river. The primary concerns are: <ul style="list-style-type: none"> • Human Health (What affects will the cleanup activities have on those living in the impacted areas? Will the cleanup plans be effective in reducing the risks of humans coming in contact with contaminated sediments?) • Quality of Life (Will cleanup procedures involve sensory effects that will impact those living in the area?) • Economic Impacts (If all the sediments are cleaned up does this mean it will be more attractive to new comers and that economic forces result in displacement of current residents? During the cleanup, will traffic patterns be impacted?) • Fish and Wildlife 	All of these questions relate to selecting and performing a remedy for the river's sediments. Unfortunately, we are only at the stage of studying the nature and extent of sediment contamination. These questions will be addressed at a later stage of the project.

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25	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization			The community feels that in past investigations conducted in specific locations along the river that there was not enough of a commitment from the responsible party to make sure that the community was informed in multiple ways and formats, had a chance to voice their concerns about procedures before final decisions were made, and was satisfied with the level of involvement permitted.	Responsible parties will be held responsible for their pollution in the river. However, right now we are only at the stage of studying the nature and extent of sediment contamination. This investigation will help us determine who is/are responsible for river contamination. DDOE will not hold parties responsible for pollution until much later in the project.
26	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Cover Page		The title of the CIP should include the Project name; without it, it seems too general and readers would have no context for the "Anacostia Study Area." We suggest "Community Involvement Plan, Anacostia River Sediment Project." The title of the Work Plan used the actual name of the Project and it is likely that all other Project documents will as well. Consistency and uniformity among documents associated with the Project is important.	We will take this comment under advisement.
27	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Section 1	3	A map of the study area would be more informative here than the map of the entire watershed (alternatively, include both here or include the watershed map as an Appendix).	We will take this comment under advisement, however, there is a map of the study area in the remedial investigation work plan.
28	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Section 1	3	Providing a list of the legacy sites as mentioned would be helpful for context with a reference to the Work Plan for more detailed information. Recommended Legacy Sites List: Kenilworth Park Landfill, Pepco Benning Road, CSX Benning Yard, Washington Gas Light Company, Polar Point, Washington Navy Yard, Southeast Federal Center, Joint Base Myer-Henderson Hall, Joint Base Anacostia-Bolling	We will take this comment under advisement.
29	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Section 1	3	Under "The CIP Goals," the following bullets should be added to the list: o Keep the public informed of ongoing and planned activities; o Provide a mechanism to consider amending planned actions based on public comments or concerns; and o Explain to citizens how their comments were considered, what DDOE plans to do, and why it reached particular decisions.	1) The CIP already has a similar goal to this in the bullet list. 2) The public comment period on the draft remedial investigation work plan and the draft community involvement plan, as well as comments received during one-on-one meetings and surveys, is the mechanism that DDOE has used to consider and amend planned actions. 3) the response to public comments discusses how public comments were addressed.
30	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization		4, 5, 9, 10	Images on pages 4, 5, 9, and 10 all need captions. For example, not everyone knows that the image on page 4 is a Bandalong litter trap on a tributary of the Anacostia River to keep trash from entering the river coming from that tributary. Images in this CIP can be used to help educate the public and captions would help accomplish this. Also, photo credit should be given if these images were not taken by DDOE.	DDOE will take these comments under advisement.
31	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Section 4	8	More detailed information should be provided concerning the Community Profile on page 8. It seems too general and there is not enough information. Other site-specific cleanup efforts along the Anacostia River could be used to compile this information.	To make the CIP more user-friendly, DDOE made the decision to provide broader information related to the community profile.
32	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Section 4	9	There are not enough Information Repositories listed on page 9 to truly be beneficial to communities for a project of this magnitude. We ask that the following libraries (and contact information for each) be included: o Deanwood Neighborhood Library, 1350 49th St NE, Washington, DC 20019 o Dorothy I. Height/Benning Neighborhood Library, 3935 Benning Rd. NE, Washington, DC 20019 o Woodridge Library, 1790 Douglas St. NE, Washington, DC 20018 o Anacostia Neighborhood Library, 1800 Good Hope Rd. SE, Washington, DC 20020 o Southeast Neighborhood Library, 403 7th St SE, Washington, DC 20003 o Southwest Neighborhood Library, 900 Wesley Pl SW, Washington, DC 20024 Other libraries suggested by community groups (ANCs, Civic Associations, etc.) should also be considered as this is an issue of District-wide interest.	DDOE will continue to use Francis A. Gregory Neighborhood Library and Rosedale Neighborhood Library as repositories for major project documents, such as the Remedial Investigation Work Plan and the Community Involvement Plan. All computers with an internet connection, including publicly accessible computers at the library, have access to the DDOE website, which provides links to relevant documents and the administrative record file, which includes all relevant documents considered during DDOE's project. Furthermore, DDOE plans on making the resources available and possibly expanding dissemination to other libraries.
33	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Section 4	8	There is a typographical error on page 8. The email address f or an important contact, Timothy Fields, is incorrect; the "d" is missing in @michaeldbaker.com.	Thank you for this comment-- the typographical error will be corrected.
34	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Appendix A	10	For the community and key stakeholder interviews: o What type of background information will be provided before the questions listed in Appendix A are asked? o Will the term "site" in Question 2 be put into context when asked?	1) Very little background information will be given to simulate what the public actually knows about the project and how DDOE can improve disseminating project information. 2) DDOE will put question 2 in context, so that interviewees understand the question.
35	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Appendix B	11	Under Environmental Organizations we recommend the following: Add contacts for NRDC, Earthjustice, and Anacostia Watershed Citizens Advisory Committee (AWCAC). For our organization, add Dan Smith (i.e., Dan Smith or Lori Baranoff , Anacostia Watershed Society) Update the point of contact for Anacostia Watershed Restoration Partnership. Dana Minerva no longer works for this organization. Update the contact information for Dottie Yunger. She is no longer with the Chesapeake Covenant Community. Add Doug Siglin, United for a Healthy Anacostia River coalition	Thank you for these comments. Appropriate changes will be made.

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36	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization			Under Neighborhood Associations add: Advisory Neighborhood Commission 6D. During a meeting on 3/10/2014, commissioners of this ANC expressed interest to DDOE in being added to this list. Advisory Neighborhood Commission 8B also expressed interest to us in being kept informed regarding this Project.	DDOE will add more neighborhood commissions.
37	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Appendix C		Use lower case "s" on PCBs. Using an upper case letter gives different meaning to the acronym. EPA is listed twice.	Thank you for these comments. Appropriate changes will be made.
38	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	Glossary		Perhaps include information about what the Anacostia River Sediment Project is in the glossary section. The definition of Point Source is incorrect. It should be corrected to read, "Pollution coming from a single discrete place, typically a pipe." Definitions listed on page 17 were all provided on page 16 and therefore do not need to be included again.	The definition of point source is incorrect, and will be corrected. Appropriate changes related to repeated definitions will be made.
39	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	General	General	Thank you for the opportunity to comment on the Community Involvement Plan (CIP) for the Anacostia River Sediment Project (the Project). We appreciate the many efforts undertaken by the District to restore and prevent further damage to the Anacostia River and are especially pleased with the commitment and leadership to address toxics pollution in the river sediments. If thoroughly and expeditiously implemented, this Project will be a major step forward in achieving a swimmable and fishable river so long desired and deserved by residents along the river and throughout the region.	No response necessary.
40	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	General	General	We believe that: • A robust and thorough community engagement process will result in a cleanup remedy that best serves the long term interests of the community, • An expeditious cleanup is best achieved by setting a 2017 goal for completion of the Project's Remedial Investigation and Feasibility Study (RI/FS) and for the District to issue the Record of Decision (ROD), and • An essential (and efficient) part of involving the public is to establish a Community Advisory Group (CAG).	The first major step in a CERCLA cleanup is to assess the nature and extent of pollution in the river, this is done by sampling river sediment and fish for a wide variety of chemicals. This investigative phase is called the "Remedial Investigation" or "RI." This is the phase that DDOE has just entered. A "Feasibility Study," which assesses the available methods and technologies for cleanup, follows the RI. The Feasibility Study provides a thorough analysis of all possible cleanup alternatives. Then, DDOE will select a preferred remedy identified in the Feasibility Study and issue what is called a "Proposed Plan." According to CERCLA, there are seven required criteria by which selected remedies are evaluated. The Proposed Plan identifies a preliminary recommendation concerning how best to address contamination at the site, presents alternative cleanup options that were evaluated, and explains the reasons for a recommended preferred alternative. The Proposed Plan is subject to public comment and review, and a public hearing on the plan is required. After receiving public comment, and providing appropriate responses, DDOE will enter a "Record of Decision"—the official selection of a remedy(is) that we will use to clean up the river. The Record of
41	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	General	General	With passage of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly referred to as Superfund, in 1980, (the law DDOE is following to conduct the Project) Congress ensured that public involvement would also be included in cleanup procedures so that those affected by contaminated sites and any cleanup action of those sites would have an opportunity to provide input on the process. While this was a great accomplishment, some felt more could be done to make the public involvement process more effective; as a result, Congress passed amendments to Superfund and EPA made administrative reforms. A memo from the Acting Director of the Office of Emergency and Remedial Response of the U.S. EPA to Superfund National Policy Managers underscores this need for effective community engagement and describes six methods that should be used for Superfund projects in order to provide "early and meaningful involvement." (See letter for references)	DDOE has and will continue to provide opportunities for the public to weigh in and ask questions at each stage of this project. In the future, DDOE plans on having meetings at every ANC in every ward in the District.
42	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization			We would also like to note the following statement from this memo, page 3, because it reinforces our concern for early community engagement: "Soliciting input before the start of the RI/FS on its scope and approach is a concrete demonstration that you take early involvement seriously."2 The U.S. EPA uses this memo as guidance for Superfund cleanups and even recommends going above and beyond CERCLA requirements for community involvement.1 Therefore, we recommend that DDOE use this and other related EPA policy documents (available here: epa.gov/superfund/community/policies.htm) for this Project. (See letter for references)	DDOE has and will continue to provide opportunities for the public to weigh in and ask questions at each stage of this project. Additionally, in regards to going above and beyond, DDOE was not required to release the remedial investigation and community involvement plan to make them available for public comment. Yet, DDOE released the documents to go "above and beyond CERCLA requirements for community involvement." In the future, DDOE plans on having meetings at every ANC in every ward in the District.
43	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	General	General	According to the EPA Superfund Community Involvement Handbook, these are some reasons why public engagement in Superfund is important: • "Most communities, including those that appear unconcerned, want to be informed of EPA's activities even when there appears to be nothing going on at the site. It is a mistake to believe that if there is nothing significant to share with the community, there is no need to talk to the community." • "The long-term success of the project is enhanced by involving the public early and of ten. Carefully considering the public's concerns throughout the process leads to better decision making." • "By allocating sufficient time and resources for community involvement at the outset, the Site Team can successfully address community concerns in site decisions." • "In some instances, public input has saved EPA from mistakes and unnecessary costs. It is more cost-effective to spend time, energy, and money working with the public regularly than to deal with resistance created when a community believes it has been left out of the process." This information is applicable to this Project and should be fully considered by DDOE.	DDOE has and will continue to provide opportunities for the public to weigh in and ask questions at each stage of the project. And, DDOE will consider these comments moving forward.

Anacostia River Sediment Project- Community Involvement Plan (February 12, 2014)

Number	Commenter/ Representative	Organization	Type	Section/Table/F igure Nos.	Page No.	Comment	Response
44	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	General	General	We are disappointed with the approach DDOE has taken this far to engage affected communities in the Project. DDOE has made it clear from the first announcement of this Project and with the release of the Statement of Work last spring that it is committed to informing, addressing concerns from, and providing involvement opportunities for the public throughout the process. To date, DDOE has fallen short on this promise.	DDOE has and will continue to provide opportunities for the public to weigh in and ask questions at each stage of the project.
45	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	General	General	Our email to DDOE on March 6, 2014 asking how representatives would reach out to communities before the comment period deadline for the CIP (See full message in the enclosed file titled 'Anacostia Watershed Society Mail - Community Engagement for Sediment Project CIP') did not receive a response. We also are not aware of anyone or any organization notified of DDOE's decision to extend the comment deadline for the draft Work Plan. Had we known, we would have continued to promote comment submissions.	These comments do not go to the substance of the community involvement plan document.
46	Jim Foster	Anacostia Watershed Society	Non-Governmental Organization	General	General	Community members with experience in somewhat similar projects have indicated to us and potentially responsible parties involved that the most effective ways of communicating with them are newsletters or fact sheets mailed directly to their homes, periodic meetings, access to information on a website, and to receive information via email. A variety of methods should be used to provide the public with information. While some methods are mentioned in a general sense throughout the CIP, specific activities need to be identified. Therefore, we suggest DDOE employ and include the following activities and methods: <ul style="list-style-type: none"> • Keep a dedicated Project website updated regularly; • Use the mail service to provide people with information when major milestones are reached, to distribute fact sheets, to announce public comment periods, and to announce public meetings; • Compile and regularly update a list of email addresses of interested parties that can be used when announcements and notifications need to be made; • Create a frequently asked questions sheet and distribute via email, mail, and on the website; • Provide all communications materials in Spanish in addition to English and make equally available; • Make every effort to let community groups know that DDOE is willing to attend and present information at community meetings. 	DDOE has and will continue to provide opportunities for the public to weigh in and ask questions at each stage of this project. In the future, DDOE plans on having meetings at every ANC in every ward in the District. DDOE will keep a regularly updated website, which will contain an administrative record file (which is also updated regularly). Additionally, DDOE send out over 20-thousand flyers via the mail to promote its June 17 public meeting. DDOE plans on using multiple medias to update the public on major project milestones. DDOE will consider creating a FAQ sheet and providing communication in multiple languages.
47	Brenda Lee Richardson		Resident	General	General	Public meetings should have been held in every Ward in partnership with each Councilmember to ensure that 657,000 residents in the District of Columbia were at least aware of this effort and then they would have to determine whether or not they wanted to attend a public meeting. I am very concerned that an issue of this nature is often limited to the environmental community for their input and they are considered the community.	DDOE wants to keep District residents as informed and as involved as possible with the Anacostia River sediment project. Certainly, not every resident knows about this project, but we have been working to keep the community informed. DDOE participated in multiple meetings in public settings, including an ANC 6D and 6B monthly meeting, meetings with local environmental organizations, one-on-one interviews with members of the public, and received input from over 60 local environmental entities via a project survey. This is not to mention the outreach DDOE has done for the June 17 public meeting, including an e-mail blast to over 60,000 addresses and hard-copy mailing to over 20-thousand residents, and public comments on our remedial investigation work plan and community involvement plan. Moving forward, DDOE plans to have meetings in every ward, where we will communicate project-related information.
48	Brenda Lee Richardson		Resident	General	General	For those who are not savvy of the environmental language, it would be pretty challenging for the every day citizen to fully comprehend what this CIP is all about and what kind of impact it would have on our health, our homes, our neighborhoods and environment.	DDOE will make every attempt to simplify the Community Involvement Plan, in what is a scientifically and technically complex project and subject.
49	Gwen Hunnicut		Resident	General	General	Throughout this plan you talk about the importance of community involvement, however, you put this document together without community involvement.	The Community Involvement Plan was put together after reaching out to interested District stakeholders. Additionally, the draft CIP was published with intentions to solicit additional public feedback. This feedback was received and changes to the work plan and community involvement plan have been made accordingly.
50	Gwen Hunnicut		Resident	General	General	Plan does not mention any pact toxic chemicals have on humans , why?	Impacts on human health are mentioned throughout the document.
51	Gwen Hunnicut		Resident	General	General	Hold public hearings on this issue	Public meetings/hearings have been held and will be held in the future.
52	Gwen Hunnicut		Resident	General	General	Form a CAG to work with this body to learn and communicate with the community.	Thank you for this comment. DDOE will take this comment under advisement.
53	Gwen Hunnicut		Resident	General	General	Robo calls need to go out as well as ads in the Washington Post paper	DDOE will make every practicable effort to communicate project events to the public in different media.
54	Gwen Hunnicut		Resident	General	General	Conduct a health study on people impacted in the community	This comment does not go to the substance of the Community Involvement Plan, but DDOE will consider the comment.
55	Gwen Hunnicut		Resident	General	General	Hire a Scientist to represent community to interpret your findings and what you give in the of raw data	DDOE will take these comments under advisement.
56	Emily Ferguson	National Park Service	Governmental	General		Please consider following EPA guidance more closely. This Plan is missing some key elements: Site Description, Community Profile, Community Needs and Concerns; Action Plan (perhaps re-purposing the Project Time Frame diagram), and, if necessary, References	DDOE followed EPA guidance when developing this CIP, but we will take this comment under consideration for future plans and documents.
57	Emily Ferguson	National Park Service	Governmental	Introduction and Background	3	Please include references to regulations requiring this CIP - CERCLA and NCP	DDOE will include references to CERCLA, the NCP, and the District's response authorities.

Anacostia River Sediment Project- Community Involvement Plan (February 12, 2014)

Number	Committer/ Representative	Organization	Type	Section/Table/Figure Nos.	Page No.	Comment	Response
58	Emily Ferguson	National Park Service	Governmental	Text Box - first bullet	3	Please consider using another word or phrase to replace 'understandable' - maybe 'in plain language' or 'meaningful'. The use of the word understandable comes up in the RI Work Plan as well as this document - please considering changing this throughout both.	The word understandable is sufficient.
59	Emily Ferguson	National Park Service	Governmental	Map	3	Please clearly label the map with places referenced in the text - for example, Bladensburg, Washington Channel, Northwest and Northeast Branches	Thank you for your comment. DDOE will take this comment under advisement.
60	Emily Ferguson	National Park Service	Governmental	Assessment and Cleanup and Anticipated Timeline	6	Please consider moving the purpose of the assessment and steps in the clean up process into the Introduction for the Site. Please also reference EPA Guidance about the cleanup process.	DDOE will consider these comments.
61	Emily Ferguson	National Park Service	Governmental	Assessment and Cleanup and Anticipated Timeline	6	In descriptions a-h please include the cleanup process name to avoid confusion between text and schematic. For instance, (f) select a final remedy (documented in the Record of Decision).	DDOE will implement these changes.
62	Emily Ferguson	National Park Service	Governmental	Assessment and Cleanup and Anticipated Timeline	6	Please make mention of the Administrative Record in this section.	DDOE will include discussion of the administrative record file within the CIP.
63	Emily Ferguson	National Park Service	Governmental	Project Time Frame	7	Please include cleanup process names: Administrative Record, RI Work Plan field implementation (instead of investigations)	DDOE will consider these comments any may make changes as necessary, for clarity purposes of the document.
64	Emily Ferguson	National Park Service	Governmental	Glossary	13-17	This glossary includes a number of terms not mentioned in the document. Perhaps tailoring this to you CIP would be better.	Thank you for this comment. DDOE will take this comment under advisement to provide clarity to the public.
65	Nicholas Alberti	ANC6A	Governmental	General		At a regularly scheduled and properly noticed meeting! on March 13, 2014, our Commission voted 7-0-0 (with 5 Commissioners required for a quorum) to urge the District Department of the Environment to complete the Anacostia Rive Sediment Project and for the District to issue the Record of Decision (ROD) by 2017.	The first major step in a CERCLA cleanup is to assess the nature and extent of pollution in the river, this is done by sampling river sediment and fish for a wide variety of chemicals. This investigative phase is called the "Remedial Investigation" or "RI." This is the phase that DDOE has just entered. A "Feasibility Study," which assesses the available methods and technologies for cleanup, follows the RI. The Feasibility Study provides a thorough analysis of all possible cleanup alternatives. Then, DDOE will select a preferred remedy identified in the Feasibility Study and issue what is called a "Proposed Plan." According to CERCLA, there are seven required criteria by which selected remedies are evaluated. The Proposed Plan identifies a preliminary recommendation concerning how best to address contamination at the site, presents alternative cleanup options that were evaluated, and explains the reasons for a recommended preferred alternative. The Proposed Plan is subject to public comment and review, and a public hearing on the plan is required. After receiving public comment, and providing appropriate responses, DDOE will enter a "Record of Decision"—the official selection of a remedy(is) that we will use to clean up the river. The Record of Decision will include DDOE's analysis of cleanup options, and provide our rationale for selecting the remedy(is). Once the Record of Decision is complete, then the "Remedial Design" phase can begin. During the Remedial Design, DDOE plans all of the details required to implement the remedy selected in the Record of Decision, e.g. permits, disposal area, staging areas, etc. Upon completion of the Remedial Design, the "Remedial Action" phase can begin. The Remedial Action is where the actual cleanup begins, and may encompass a much longer timeframe depending on the remedy. DDOE will efficiently move through the process, but we cannot commit to a cleanup beginning in January 2017 because of the multi-step and complex nature of the cleanup. In fact, many CERCLA cleanups often take longer than three years just to complete the RI. A CERCLA cleanup is a process that does not lend itself to outside deadlines, and rushing through any stage could hinder the project's overall effectiveness while potentially compromising the likelihood of cost recovery against those who polluted the river. The <u>current schedule accounts for delays in an inherently complicated process.</u>
66	Nicholas Alberti	ANC6A	Governmental	General		We urge DDOE to develop and implement a robust and thorough engagement process to help this goal. In addition, we recommend that the DDOE form a Community Advisory Group (CAG) so our community can stay fully informed and has an ongoing conduit to inform DDOE of community concerns as the project progresses.	Thank you for this comment. We will take the suggestion of a CAG under advisement.