

Memo

Date: March 30, 2004
To: Debbie Kring, Community Coordinator, EPA, Omaha Lead Site
From: Shireen S. Rajaram, Ph.D., Community Advisory Group (CAG) member
Cc: Community Advisory Group and other interested people
Re: Comment on the EPA Community Involvement Plan (CIP) for the Omaha Lead Site, March 2004 draft.

This is a good start for the Community Involvement Plan (CIP) that is designed to “enable the U.S. Environmental Protection Agency (EPA) to work effectively with community members affected by or interested in the Site.”

Here is some feedback that I would like the EPA to consider:

- Please provide more details on the demographic background (from Census 2000) of both Omaha, and the Superfund site. For example, provide details on home-ownership, age of homes, income, race/ethnicity, number of children, etc. This will allow people to get a good idea of the both the Omaha community and the area affected by the Superfund.
- Delineate the different concerns of the different groups of people and outline strategies to address the different concerns raised.
- The report states that community concerns were determined primarily from face-to-face interviews of 150 residents. Who conducted the interviews and what is her/his training/experience in qualitative interviews? What software if any was used to analyze the data? Does the person live in Omaha and is s/he familiar with the Superfund area? How was the sample determined? Who are the people that were interviewed? For example, how many were residents that had their soil remediated? Which zip code did they live? Age? Did they have young children? Who were the community leaders? How many African Americans, Latinos, Sudanese-Americans, etc., given that these ethnic groups comprise the majority of affected residents.
- On page 9-10, it is stated that EPA held a series of meetings to engage citizens in the Superfund process. How many were held in North Omaha and in South Omaha? As you know half of the Superfund area is in North Omaha and the other half is in South Omaha. How many people attended each meeting? Was an interpreter present to meet the needs to the Spanish speaking population? It appears that only one meeting was held in South Omaha (south of Dodge Street) where the Latino population mainly resides. It is my recollection that only 2 people attended the meeting in South Omaha. If this is the case, CIP might need to consider what evaluation process exists to improve the community engagement. Merely holding meetings without proper outreach does little to engage the community in the Superfund process.
- Page 6-7, please indicate location of LSOC (24th and Lake), how often community

meetings are held (generally every other month), and where (TAC building in North Omaha).

- In your information dissemination channels please include: the *Omaha Star* one of the oldest African American newspapers in the mid-west serving the Omaha African American community since 1936; *El Perico*, a Spanish-English language newspaper; and *La Maquina* (97.7) a Spanish language radio station. Notice of availability sessions and dissemination of other EPA information needs to be advertised through these outlets including the Omaha World Herald and *Nuestro Mundo*. Please note that some of these newspapers are biweekly or monthly.
- In Appendix A, in the Community Involvement Plan, only one Community Based Organization (CBO), LSOC has been listed. Making contact with and building trust with other CBOs is highly recommended. In your Informal Briefings and in dissemination of EPA community meetings, etc., please include: Chicano Awareness Center located in South Omaha 4821 South 24th Street that is a key community based organization that serves the immigrant Latino population; Southern Sudan Community Association, 4819 Dodge St; Heartland Refugee Resettlement 120 S. 24th St; Nebraska Urban Indian Health Coalition, 2240 Landon Court, etc., etc. You will need to network with many of the area churches and mosques as well.
- What evaluation mechanisms exist to monitor the effectiveness of the CIP? Process as well as outcomes evaluation using quantitative and qualitative data? How will community input be solicited and how will information be disseminated to the residents. Please provide details.
- In Appendix E, on Cardinal Rules of Risk Communication you might want to include a fundamental rule of ensuring linguistic and cultural competence for people who have Limited English Proficiency (LEP). For broad guidelines, please consult Title VI of the Civil Rights Act of 1964, and other LEP guidance documents.
- What plans does the EPA have to translate information into languages other than Spanish (e.g., Arabic, Nuer, Vietnamese, etc.) to meet the needs of the Omaha Site.
- Page 4, explain “PRPs.”

Finally, effective implementation of a good CIP will require the full-time presence of an EPA community coordinator in Omaha, who is bilingual (Spanish/English), familiar with the Superfund area and can work with a multiethnic community.

Thank you for your continued community outreach efforts in Omaha and for soliciting feedback on the CIP draft. Please let me know if I can assist you in any way.