

VI. Conclusions and Recommendations

To realize its environmental, social, and economic goals, Delaware's brownfields redevelopment program needs active communities to be a part of the design and implementation process. Meeting the twin objectives of environmental justice and urban revitalization hinge upon this involvement. CEEP's examination of National Brownfields Pilot Projects reveals that community participation has been judged essential by all stakeholders to the pursuit of just and sustainable development.

Do State and City brownfields redevelopment plans and programs provide mechanisms for community participation? The brownfield initiatives that are being implemented by the State and City suggest that community participation issues are being taken into account. In particular, Wilmington's Brownfields Pilot Project indicates that the City has committed itself to community involvement in brownfields redevelopment. Moreover, both the State and City have begun to integrate environmental justice concerns into their programs and policies. But the extent to which these efforts will be effective in initiating meaningful community participation and promoting environmental justice is still largely unknown. CEEP's research of National Brownfields Pilot Projects found that there can be a number of obstacles to meaningful community participation in brownfields redevelopment.

What are the obstacles to meaningful community participation? What actions can the State and City take to address them, thereby ensuring that community-based environmental, health, economic and social goals are integrated in brownfields redevelopment? Before answering these important questions, a brief overview of CEEP's overall findings from its survey of programs around the country is given. These findings are then used to guide CEEP's recommendations on breaking down the barriers to community participation.

Overview of Pilot Research Findings

Examination of the individual National Brownfields Pilot Projects found that since community participation and environmental justice directives from EPA were not specific and federal oversight and evaluation was incomplete, the degree of citizen involvement varied from pilot to pilot. A continuum was constructed to capture the degree of involvement—from reactive to pro-active community participation. In the reactive cases, decisions concerning brownfields redevelopment were made largely among government and business partners, with communities included in largely an advisory role. *In the pro-active cases, communities were involved continuously from the start of the pilot project. The key to pro-active participation was found to be the resource and educational support and explicit institutional recognition given to community involvement in the redevelopment process.*

The difference in capacity to address environmental justice and overall urban revitalization issues was predictable: those projects with a pro-active community participation component proved to be better equipped than their reactive counterparts. Pro-active community participation was the key to successfully promoting environmentally just and sustainable development. *This finding underscores the importance of pro-active community involvement in brownfields programs.*

In many of the pilots examined for this report, residents of affected communities were initially unaware of how they could articulate their views in the brownfields redevelopment process. If the aims of the EPA and the National Environmental Justice Advisory Council (NEJAC) regarding environmental justice and urban revitalization in brownfields are to be effectively met, it is clear that *awareness-building must be included as an important part of the brownfields planning process.*

In many of the pilots, community involvement was initially limited by distrust on the part of community members towards program administrators, regulators and development interests. This distrust was the result of previous policies that had paid little attention to the needs, concerns and goals of communities as defined by their members. One key aspect to securing the initial trust and involvement of communities was the sharing of knowledge and visions between program administrators, regulators and community members. *In order to move from confrontation to collaboration, administrators and regulators need to make sincere efforts to communicate with communities and recognize the significance of community knowledge, concerns and goals in the redevelopment process.*

Some of the pilots also experienced difficulty in sustaining community involvement throughout the brownfields redevelopment process. Community participation, regardless of how successfully implemented it might initially be, will have little lasting value if the affected community does not see concrete results from its involvement. *In order to attract community participation throughout the brownfields process and maintain community trust, pilot projects need to deliver remediation and reuse plans that are actively endorsed by the affected communities.*

Those pilots that were most successful in delivering remediation and reuse plans actively endorsed by communities were ones that allowed communities an influential role in the decision-making process on brownfields redevelopment. Pilots which sought to operationalize community participation and ensure environmental justice by providing mechanisms for community input in the brownfields process were the most successful. Such institutional recognition of and support for community participation was key to maintaining community interest in brownfields redevelopment issues. *This reveals the significance of operationalizing community involvement and environmental justice in brownfields programs through statutes, policies and regulations.*

Finally, our survey reveals that community-focused resource and educational support is needed for community participation and environmental justice to move from abstract ideas to concrete realities. In order to realize just and sustainable development, community participation needs to be supported in specific ways. Community organizations need staff who focus on these issues and educational and research support so that residents can be informed about the often complex aspects of brownfields redevelopment. *Providing communities with a seat at the table is not enough: actions need to be taken to reaffirm long-term and meaningful community participation in which the needs, concerns and goals of the community, as defined by the community, play a central role in the brownfields redevelopment process.*

Recommendations

1. Need for a Statement of Goals

CEEPs findings indicate that integrating community participation and environmental justice concerns into Delaware's brownfields redevelopment process is an essential element of building sustainable communities. The keys to successfully integrating those elements lies in achieving the following linked program goals:

- Building awareness of community participation and environmental justice in the brownfields redevelopment process at the community level;
- Coordinating community participation and environmental justice efforts across government agencies and between different levels of government;
- Enhancing communication and information dissemination regarding brownfields between government actors, private interests, and community residents;
- Operationalizing community participation and environmental justice through the brownfields redevelopment decision-making process;
- Institutionalizing community participation and environmental justice through the creation of a State Office of Environmental Justice or other environmental actor; and
- Providing the resource means necessary to continue efforts to build capacity and awareness among community resident and organizations.

A statement of such goals reaffirms Delaware's commitment to environmentally just and sustainable development and provides a common context for action amongst stakeholders.

2. Development of Specific Policies, Processes, and Procedures

In order to actualize these interlocking goals, new supporting policies, processes and procedures will need to be put in place.

a. Building awareness at the community level throughout Delaware

Currently, the Urban Environmental Center is Wilmington's community-based partner in the National Brownfields Pilot Project. As such, it is developing and implementing programs to inform, involve, and empower the residents of brownfield areas in the redevelopment process. Although UECs activities are crucial to building sustainable communities, they are limited in scope.

UEC and the City's activities concentrate efforts among a limited number of sites and communities. A broader city-wide effort at building awareness of and empowerment in the brownfields redevelopment process at the community level is needed. Ultimately, a statewide process will also be needed. In order to bring about city-and state-wide awareness and participation Delaware needs to develop and support a Brownfields Community Awareness Program.

The program could build from the UEC model and attempt to expand its efforts across Delaware. Recommendations for a state-wide program include:

- Use of media outlets (television, newspaper and radio) to generate interest in the brownfields redevelopment process;
- Establish educational and public participation workshops geared towards the concerns, needs, and goals of citizens;
- Rely on nonprofit organizations such as the UEC to enhance educational and participation capabilities;
- Develop and disseminate brochures and fact sheets on community participation, environmental justice, and the brownfields process.

b. Coordination of efforts across State and City government agencies

1) Establish a Memorandum of Agreement between State and City government agencies

State and City agencies need to coordinate their community participation and environmental justice efforts. Different missions and goals can often lead to inconsistent and overlapping policies and procedures. Establishing a Memorandum of Agreement (MOA) among the State and City agencies involved in the brownfields redevelopment process that develops common community participation and environmental justice goals can alleviate these difficulties. It can also serve as a template for coordination between the State and other levels of government throughout Delaware.

2) Establish data collection, information sharing, and protocols between relevant agencies

Recently, the State's Department of Natural Resources and Environmental Control and the City of Wilmington entered into an MOA regarding the sharing of information. Information sharing and the designation of information responsibilities can substantially eliminate duplicative efforts and free resources to increase the scope of information available. In this manner they can enhance the effectiveness of the brownfields redevelopment process.

3) Create a forum for coordination, conflict resolution and consensus

Coordination of these efforts, the inevitable conflicts that will arise, and forming consensus among different agencies and levels of government is essential. This may require the creation of an advisory commission to define specific goals and implementation plans towards achieving those goals. Task Forces have been successfully used in other jurisdictions for these express purposes. They can serve as models for Delaware.

c. Enhanced communications between government, private interests and community residents

To promote community participation and environmental justice, enhanced communications between community residents, government actors, and private interests will be needed. Access to technical, health, cleanup, and redevelopment information needs to be available to community residents and organizations in a user-friendly format. In addition, community residents possess

the knowledge of neighborhood environmental and social problems that is essential to the pursuit of just and sustainable development. This knowledge needs to be recognized and documented as part of the redevelopment process.

Recommendations for enhancing communications include:

1) Establish cleanup and redevelopment roundtables

If community residents are only consulted during the latter stages of the brownfields redevelopment process, the valuable knowledge that members may have can be lost. Forums involving community residents with government and industry actors can maintain community input throughout the redevelopment process. Information, goals, and visions can be exchanged and communications with community residents can be made more effective.

2) Create an Internet resource on brownfields for community use

A free electronic network can be developed to serve the needs of organizations and individuals working on brownfields issues. It should provide valuable services that could significantly enhance communications among community organizations and residents on environmental justice, sustainable development and other environmentally relevant dimensions. The internet resource should offer electronic mail, world wide web use, a commons/discussion section, and a data bank of information. These services could help community residents stay in contact with one another, keep abreast of the latest developments, and learn from the experiences of other communities. DiamondNet, an online community network for Delaware organizations maintained by the Center for Community Development and Family Policy of the University of Delaware, could provide the platform for creating a community-focused electronic resource to address brownfields and related environmental concerns. Community groups and individual residents often do not have the financial resources necessary to take advantage of electronic resources. To overcome this impediment, library computers can be used and computing sites can be established in communities with computers provided through donations from both educational institutions and the business community in Delaware.

3) Improve electronic resources provided by government actors

Government actors need to make their information and data regarding brownfields and brownfield-related issues available to the community through electronic resources. For example, currently DNREC's SIRB has designed a website at <http://sirb.awm.dnrec.state.de.us> to disseminate information on and better facilitate the brownfields redevelopment process. Although the website is a valuable resource for information, community groups and individual residents have not been able to use it due to access impediments. DNREC should consider the development of interactive workshops to learn from communities the information they seek and the problems encountered in obtaining it. It can then revise its website to be responsive to community needs and to provide training to community groups on how to use their system.

d. Operationalize efforts through permitting, licensing, and statutes

In order to promote pro-active community participation, community members must have more than an advisory role in the brownfields redevelopment process. The operationalization of community participation and environmental justice efforts through permitting, licensing, and statutes is an essential ingredient toward the overall goal of having the community meaningfully participate in the decision-making process. Planning, zoning and licensing issues must be made subject to community review. Having communities involved in these processes is essential to building sustainable communities.

e. Institutionalize efforts by establishing state-level responsibility for the pursuit of environmental justice goals

In order to advise, provide policy recommendations, and set and evaluate steps to meet state-wide goals of environmental justice that should accompany brownfields redevelopment in Delaware's future, a state-level institutional responsibility needs to be defined. A number of states (California, Florida, Texas and Wisconsin among them) have created environmental justice commissions whose purpose is to evaluate the degree of environmental inequity in their states and propose changes in environmental policy to reduce it. Other mechanisms such as state offices of environmental justice, inter-agency committees, and executive advisors are used in different jurisdictions to address this need. The State of Delaware should consider the creation of an institutional actor with clear lines of responsibility to prioritize environmental justice concerns and ensure that the future will be an environmentally just and sustainable one built on pro-active community involvement.

f. Establishment of a state-supported fund for capacity- and awareness-building efforts by community organizations

For communities to play an active role in brownfields redevelopment and, more broadly, to contribute to goals of environmental justice and sustainable development, targeted resources will be needed. Community organizations will need to train their own staff and initiate campaigns to make their constituencies aware of the range of environmental issues that must be resolved if we are to build just and sustainable communities for the future. Because such activities offer Delaware-wide benefits and because their execution is directly tied to State policy and regulation in the environmental field, financial support for pro-active community involvement should be provided by the State of Delaware. Such financial support will need to be coordinated with other State programs such as the Brownfields Assistance and Voluntary Cleanup Programs.