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November 18, 2002

TO: Melissa Griffin, NAVSTA Newport IR Site Manager

FR: Dave Brown, RAB Public Information Committee Chair

CC: Information Committee Members; Other Committee Chairs; Citizen Co-chair; Jim Shafer, Navy North

RE: ***The OCT. 2002 DRAFT PROPOSED PLAN FOR OFFTA CLEANUP:  
IS IT LIKELY TO BE UNDERSTOOD BY CITIZENS AND TO ADDRESS THEIR  
QUESTIONS?***

At the October 16 RAB meeting, I suggested that it might help if some of us provided you Navy folks with our reactions and constructive suggestions on this draft. This would be from the standpoint of effective communication with lay citizens who take part in the upcoming public open house/ hearing and comment exercise. It was left that we individually feed you our comments prior to, or at, the November 20 RAB meeting. (Somehow this didn't show up in the minutes.)

My own comments follow. They relate only to how clearly the draft may be understood and how it relates to likely citizen concerns. *I am not addressing the proposal and technical content itself. My comments should not imply endorsement of the plan that the Navy is pushing, or agreement with the points made about the various options.* In fact I haven't yet reached a conclusion about which option to favor. I still need more information and clarifications. A number of the criticisms raised by EPA appear valid (see the Oct. 8 letter to Jim Shafer from Kymberlee Keckler). And the Navy's answers to questions raised by us at RAB meetings have not been entirely reassuring.

1. Overall, the draft Proposed Plan strikes me as quite easy to understand. It has few technical terms. There is effective use of boxes and lists to highlight important points. It has helpful maps. It is not too long or complicated for a lay person with at least high school education who is seriously interested in cleanups and OFFTA.
2. For persons with only casual interest, or for journalists who want the bare bones to start with, one could argue for a snappier one- or two-page brief also being made available.
3. It's not blatant, but there could be the nubbin of too much Navy PR in its style. I urge that the final version not make it appear as though the favored options are the only possible choices. Unlike some sites, the best answers for OFFTA (the offshore sediment especially) are not clear-cut. The write-up should tell about the points that can validly be made for other options, and explain candidly why the Navy has come to favor its particular choices. Citizens and the press are almost sure to be turned off if it looks like a one-sided "snow job."
4. This draft tries to address the criteria officially required by CERCLA, as shown on p. 6. But real people do not fit official lists. As brought out in RAB meetings, additional considerations will probably be on citizens' minds. Anything that can be done to avoid making the Plan sound official and stilted, and to have it address questions like the following would be all to the good:

- a) "So the offshore sediment is contaminated, but you're not wanting to do anything about it now, in hopes that either i) the problem will go away or ii) the causes will become better known. What could happen to make the contamination go away, or better explained, that the OFFTA studies haven't already disclosed? Isn't it pretty clear that most of the bad stuff is already there and has stayed that way for some time?"
- b) "Who would monitor the sediment and decide whether the problem is going away? Doesn't the Navy itself have an incentive to turn a blind eye toward it?"
- c) "You say that keeping people away from the contaminated offshore area will be no problem for the Navy. Yet we've seen people get pretty close to Navy sites to fish and such even when they aren't supposed to. And also what about storms causing the sediment to drift out into the Bay?"
- d) "I don't see any mention of the danger of people eating contaminated shellfish, if the marine sediment is left. Can we assume that this is not a problem?"
- e) "As OFFTA is right on the Navy base, I think it can be up to the Navy itself to decide how far to go with the cleanup now, so long as it doesn't affect non-Navy persons or the ecology nearby. To what extent is it sure that civilians and/or other places won't be harmed by not doing a complete cleanup now?"
- f) "I can see the Navy's point about not unnecessarily tearing up the near-shore ecology (lower p. 9). But I understand that EPA wants the sediment cleaned up now. What are the arguments for that?"
- g) "The idea of saving taxpayers' money by not cleaning up things unnecessarily is appealing. But the other side of the coin is: Why not do a first-class cleanup job at OFFTA now, which will probably be cheaper, safer and neater overall than monitoring, and doing studies all over again, and having cleanup clutter later on?"
- h) "If we go along with the Navy's saving money by not doing the offshore OFFTA cleanup now, how does the community stand to gain? Will the \$\$ savings be used to clean up some other NSN sites more quickly? Or will it just be dribbled away for cleanups somewhere else or non-environmental purposes?"
- i) "Especially with all the talk about war with Iraq and such, if the need to clean up the OFFTA offshore sediment or groundwater becomes reaffirmed a few years from now, how can we be sure that the Navy would have any cleanup funds left? Isn't a bird in hand worth two in the bush?"
- j) "It's said that recently the Navy changed the fences and opened up a new parking lot on part of OFFTA itself. How does this square with the flap we had a few years ago, when it was said that Katy Field is contaminated, and should be fenced off from people and cleaned up? If it isn't all that dangerous, why clean it up at all? If it is dangerous, or still seeping contaminants offshore, then shouldn't we clean it up now, instead of using it for a parking lot and exposing innocent people? Confusing. How can the Navy have it both ways?"

- k) "This groundwater business isn't clear [no pun intended]. Where is the water coming from? Where is it going? Is the water coming mainly from the parking lot, from underneath Katy Field, or from someplace else on the Island? And where do the drainpipes come from and go to? Can you show us a side-view, aquifer-type diagram of where the groundwater flows?"
- l) "Re the community impacts (p. 11, lower box), wouldn't there be other minus factors of the Navy plan? Like: dangerous contamination still remaining at/near OFFTA for some years into the future; restrictions on how the groundwater can be used; no swimming or fishing; bad appearance of the fences and other barriers on the nice NAVSTA campus?"

- m) "What do other citizens think about this proposal?"

Especially if the public meeting is cafeteria style, it might be good to urge RAB citizen members to be on hand to give their "take" as individuals. The Aquidneck Island Citizens Advisory Board (AICAB), which does independent assessments of cleanup proposals, might also be invited to have representation.

It should not be yet asserted that the RAB as a group has endorsed the Navy's preferred plan: The internal discussion of OFFTA that we had back in July was based on incomplete information and intended mainly to zero in on aspects needing clarification. Only nine citizen members were there, and only a straw vote was taken to indicate preliminary leanings (7 of the 9 were inclined to endorse the Navy plan if no new bad effects were to come to light).

5. The p. 12 box, "What's a Formal Comment," is confusing, to me at least. Will the Navy provide a written response only to *written* comments submitted during or shortly after the public meeting? Or to "*formal*" *oral* comments also? If so, what do you have to do (or who do you have to be) to get your oral comment to be considered to be formal? Get on a speakers list at the start of the meeting? Comments later on, after the Comment Period, will be accepted in writing but are not considered formal and don't have to be responded to?
6. What if an interested person/group can't be there but, besides seeing the library materials afterwards, would like to know what happened at the meeting? As discussed at the October RAB meeting, maybe the Navy can videotape that session and make copies available in the local libraries? If so, the final version of the Plan, or the meeting announcements, could mention this.
7. Finally, a couple of minor editorial questions:
- P. 6, rt. col., para. 1 ...options for each *media*. Should be *medium* (singular) or use another phrase, like "*each OFFTA component.*"
  - P. 7, top half, last para. ...is given a *GB* classification... Might explain GB.