



**WATER MANAGEMENT DISTRICT**

Henry Dean, Executive Director  
John R. Wehle, Assistant Executive Director  
Charles T. Myers III, Deputy Assistant Executive Director

**POST OFFICE BOX 1429 PALATKA, FLORIDA 32178-1429**  
TELEPHONE 904/329-4500 SUNCOM 904/860-4500  
TDD 904/329-4450 TDD SUNCOM 860-4450  
FAX (EXECUTIVE/LEGAL) 329-4125 (PERMITTING) 329-4315 (ADMINISTRATION/FINANCE) 329-4508

August 29, 1995

Kevin Gartland, Director  
Environmental Division,  
Facilities and Environmental Department  
Naval Air Station Jacksonville  
Jacksonville, FL 32212-5000

NAS Jacksonville Administrative Record  
Document Index Number

**32212-000**  
**13.01.00.0013**

Re: NAS Jax RAB, TRC, and NRT processes.

*Kevin*  
Dear Mr. Gartland:

Following up on our discussion after the Restoration Advisory Board (RAB) meeting of August 15, 1995, Ms. Nepshinsky and I offer the following:

While we recognize the benefits and value of the RAB process in the public understanding of Installation Restoration at NAS Jax, the concomitant demise of the Technical Review Committee (TRC) has caused an important loss of opportunities for communication between the professional scientific and regulatory staffs at St. Johns River Water Management District (SJRWMD), NAS Jax, and your consultants, ABB Environmental.

Past TRC meetings were occasionally tedious and sometimes became a forum for one or two individual's agenda, but always offered the opportunity for us to engage in an informal exchange of ideas, and many cost- and time-saving procedures were developed as a result. Concerns were discussed as soon as they appeared and were often resolved immediately rather than much later (during the formal "review" process). Goals of long-range programs like the Lower St. Johns River Basin SWIM program, potential changes in regulatory procedures, and concerns regarding adequacy of data acquisition and field procedures were often productively managed in a few minutes rather than becoming contentious issues during mandatory Reviews.

The present "Partnering" meetings are, of course, necessary for active discussions between regulatory agencies and NAS Jax, but now are limited (by both need and function) to Florida Department of Environmental Protection (FDEP), U. S. Environmental Protection Agency (EPA) and NAS Jax representatives. These meetings assume that all environmental issues are within the expertise of the participating FDEP and EPA representatives: many complex non-point source pollutant and habitat issues are concerns of SJRWMD and, at present, may only become apparent upon review of Final Draft documents rather than during data gathering or analysis. SJRWMD may not

- Patricia T. Harden, CHAIRMAN  
SANFORD
- William Segal, VICE CHAIRMAN  
MAITLAND
- Dan Roach, TREASURER  
FERNANDINA BEACH
- Otis Mason, SECRETARY  
ST. AUGUSTINE
- Kathy Chinoy  
JACKSONVILLE
- Griffin A. Greene  
VERO BEACH
- James H. Williams  
OCALA
- Reid Hughes  
DAYTONA BEACH
- James T. Swann  
COCOA

021-0555

need to attend every Partnering session, but may need more opportunities for input than the present scenario allows. (We were unaware, for example, of the newly shortened timeframe for review of the Draft RI/FS for OU 1 until an informal conversation with Jorge Gaspar of FDEP at the 8/16/95 RAB meeting.) Similarly, the present Natural Resources Trustee (NRT) group meets only once per year, and does not offer a timely interaction on many ongoing IR projects.

We fear that NAS Jax may embark on extensive, expensive programs without the benefits of local knowledge that the SJRWMD staff may offer. Our past interactions regarding fish toxicity, fish population abundance, benthic bioconcentration of toxins and manatee/endangered species habitat are all examples of how the TRC process and informal peer review of ideas benefited the Navy and the environment. Several of the ABB project managers and their sub-contractors (e.g.: Norm Richardson, Laurie Shenowsky, Derralyn Rennix, Janet Burris) could also attest to the value of our past informal consultations.

We hope that you and your staff will consider some modification of the present process that will allow us at SJRWMD the desirable inputs without increasing timeframes, administrative workload or causing any delays in the difficult IR process.

Sincerely,

*Bob*

Bob Brody, Manager  
Natural Systems Sub-program  
Lower St. Johns River Basin Management Program

RB:rcs

c: *JN* Janis Nepshinsky, Environmental Engineer  
Department of Resource Management

cc: D. Gaskins, SouthDiv  
J. Tremaine, ABB  
LSJ-NSS