

## UNITED STATES MARINE CORPS Natural Resources and Environmental Affairs Division Marine Corps Base Camp Lejeune, North Carolina 28542

IN REPLY REFER TO: 11000/4 NREAD 23 July 1984

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune To: Assistant Chief of Staff Facilities, Marine Corps Base, Camp Lejeune

- Subj: Environmental Enhancement/Impact Review Board Meeting Agenda for 24 July 1984; comments concerning-
- Ref: (a) AC/S FAC memo 5420/2 FAC of 18 July 1984
- Encl: (1) Comments on Proposed K-2 Impact Area/Drainage and Clearing
  - (2) Comments on Tracked Vehicle Trail
  - (3) Comments on LAV Operations in Hoffman Forest
  - (4) Comments on LZ Bluebird Repair Project

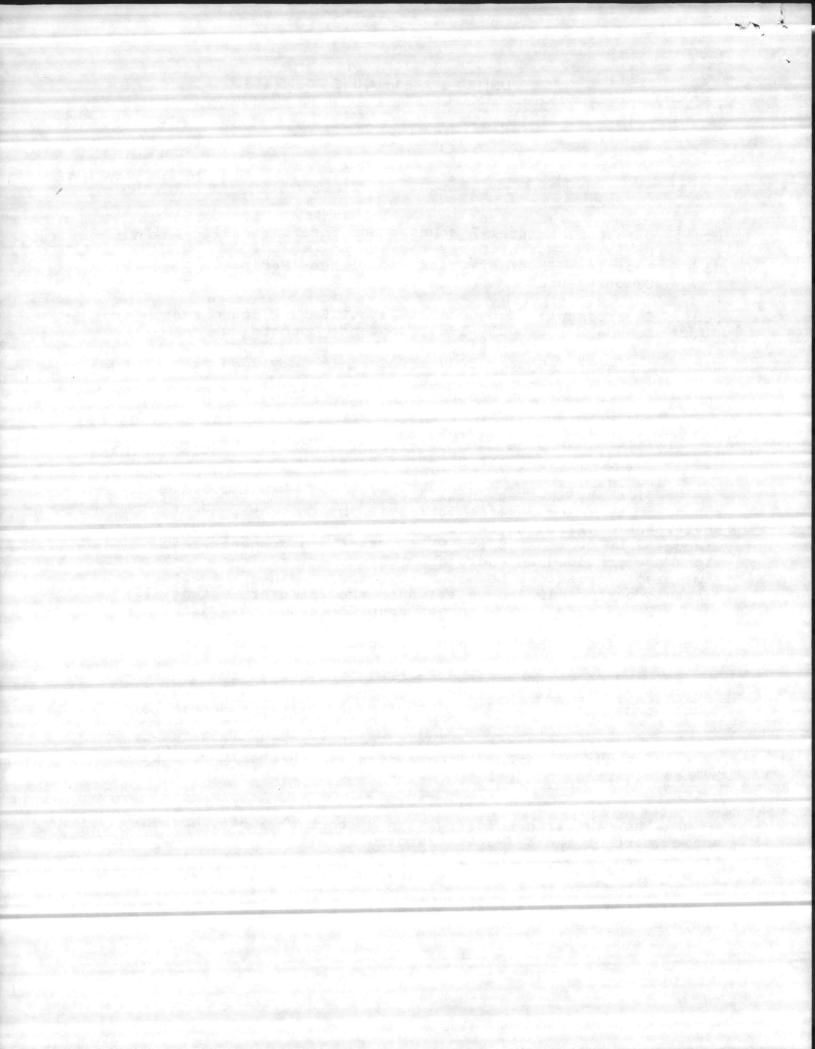
1. Preliminary Environmental Assessments (PEA) furnished and scheduled by the reference for review by the Environmental Impact Review Board (EIRB) on 24 July 1984 have been reviewed and discussed by members of the NREAD staff and comments/recommendations are provided as enclosures (1) - (4). Although there are some minor variations between Mr. Peterson and Mr. Sharpe's comments our conclusion relative to the PEA's are essentially the same. Pertaining to K-2 Impact Area Clearing and Drainage Project, the following issues are not addressed or are not adequately addressed or there are inaccurate statements, i.e.:

a. There are endangered species (Red-Cockaded Woodpeckers and American Alligators) in the proposed project area requiring formal consultation with the US Fish and Wildlife Service.

b. Whitehurst Creek and Mill Creek are classified by state as primary nursery area. These areas will probably be impacted by the clearing and drainage of K-2 due to accelerated freshwater flow.

c. The Base Archaeological and Historical Survey of 1981 showed part of the K-2 area as being sensitive and it is recommended consultation with the state Archives and History personnel be completed before clearing and drainage work begins.

d. Drainage of K-2 area wetlands requires review by the Army Corps of Engineers before work begins.



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e. File a Federal Consistency Statement with the NC Office of Coastal Management.

f. Submittal of a sedimentation control plan to the state prior to beginning the work in the K-2.

g. In my opinion, outside agencies may consider the K-2 project a major federal action because of impacts on endangered species, wetlands, primary nursery areas and archaeological and historical resources. In my opinion an Environmental Assessment (EA) is required by Headquarters Marine Corps because of both the environmental impact and the patential . for controversy.

The reference gives the Director, NREAD credit for preparing 2. the PEA for the construction of track vehicle trail from Rhodes Point to TLZ Cardinal. NREAD provided information for the PEA but did not prepare the document. It is this Division's position that a sedimentation control plan approved by the state is required.

Pertaining to LAV operation in Hoffman Forest, NREAD is of 3. the opinion there will be conflict between LAV and general public use of the area. Headquarters Marine Corps approved EA is required. A state approved sedimentation control plan is required.

4. Pertaining to LZ Bluebird repair, it is recommended base consult with the State Department of Archives and History pertaining to possible artifacts under the matting, as well as adjacent areas. A state approved sedimentaiton control plan is required.

Earlier this year I discussed conflicts that were arising 5. between the Environmental Engineer and me and my staff with you. Also, I expressed concern about some of the comments I was hearing from LtCol Cummings pertaining to NREAD matters and how the base should handle the matter as related to management and consultation with off base personnel. Pertaining to paragraphs 3 and 4 of Mr. Sharpe's portion of enclosure (1), I agree with Mr. Sharpe's statement that the Environmental Engineer and SJA have provided inaccurate information which has the base in a potentially embarrassing position.

J. J. WOOTEN

