

11000/5  
NREAD  
23 July 1984

From: Supervisory Ecologist  
To: Director, Natural Resources and Environmental Affairs  
Division

Subj: PROPOSED PROJECT TO CLEAR AND DRAIN THE K-2 IMPACT AREA

Ref: (a) Executive Order 11990  
(b) NCAC Title 15, Chap 4, Sedimentation Control  
(c) Endangered Species Act of 1973 as Amended  
(d) MCO P11000.8B  
(e) Chairman, EIRB ltr 5420/2 FAC of 18 July 1984

1. The subject project has the following significant environmental impact:

- a. Will cause accelerated rates of discharge of freshwater and sediment to primary nursery areas (as identified by State fisheries regulations).
- b. Alteration of several types of wetlands specifically protected by reference (a) by channelization/drainage.
- c. Affects the habitat of the endangered species, *Dendrocopos borealis* (Red-Cockaded Woodpecker).
- d. May affect the endangered species *Dionaea muscipula* (Venus Fly Trap); several species of *Sarracenia* (Pitcher Plants), and alligator *mississippiensis* (American Alligator).

2. The subject project requires implementation of the following procedural requirements:

- a. Filing of a Federal Consistency Determination with the North Carolina Office of Coastal Management.
- b. Submittal of a Sedimentation Control Plan required by reference (b).
- c. Consultation with United States Fish and Wildlife Service (USFWS) and North Carolina Wildlife Resources Commission as required by reference (c).
- d. Submittal of an Environmental Assessment (EA) to Headquarters Marine Corps as required by reference (d).



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 TO: [Illegible]  
 SUBJECT: [Illegible]

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3. The considerations listed in the foregoing are almost the same as those pointed out by NREAD during the Environmental review of the recently completed G-10 Impact Area clearing project. At that time the Environmental Engineer, AC/S Facilities and members of the Staff Judge Advocate's (SJA) office cooperated in refuting the NREAD position. In my opinion, inaccurate information was provided by the Environmental Engineer and SJA which resulted in possible violations of references (a), (b) and (c). It must be assumed that the Environmental Engineer and SJA will take the same position on the subject project. The approach used by the Environmental Engineer and SJA has, in my opinion, seriously harmed previously excellent working relationships between the Base and both the USFWS and the Wilmington District, U. S. Army Corps of Engineers.

4. It is recommended that K-2 Impact Clearing and Drainage Project PEA provided by reference (c) not be put before the Environmental Impact Review Board unless the board members are provided thorough background which includes all of NREAD's comments on both the K-2 and the G-10 project. The Board should also be advised that the Wilmington District U. S. Army Corps of Engineers has made the USFWS aware that the areas of Red-Cockaded Woodpecker habitat in the G-10 have been cleared and that habitat is also present in the K-2 Impact Area.

D. D. SHARPE

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