



UNITED STATES MARINE CORPS  
MARINE CORPS BASE  
CAMP LEJEUNE, NORTH CAROLINA 28542

J.P.  
840726  
File

IN REPLY REFER TO

11000  
EOD  
26 July 84

From: Explosive Ordnance Disposal Officer  
To: Assistant Chief of Staff, Training  
Subj: NREAD COMMENTS CONCERNING K-2 IMPROVEMENT PROJECT

Ref: (a) Director NREAD ltr 11000/4 over NREAD dtd 23 JUL 84  
(b) Ecologists ltr 11000/5 over NREAD dtd 23 JUL 84  
(c) Wildlife Manager ltr 11015/1A over NREAD dtd 23 JUL 84  
(d) Forester ltr 11000/2 over NREAD dtd 24 JUL 84  
(e) Ecologists ltr 11000/5 over NREAD dtd 23 JUL 84

1. References (a) through (e) have been carefully reviewed. The first request for range improvements in the K-2 Impact Area was submitted on 19 January 1984. Since that time numerous offers for NREAD to inspect or review the K-2 Impact Area have been made. Because it is the policy of NREAD not to go into impact areas, even with EOD escort, they have not taken advantage of these opportunities. Their letters while well written are of little value without on site visits of the areas in questions and constantly refer to "MAY AFFECT SITUATIONS". I believe the Amended PEA submitted on 11 July 84 effectively covers all areas of concern. Base on consultation with the Base Environmental Engineer and SJA office and our prepared presentation to the EIRB; I believe the PEA will be recommended for approval by the Commanding General.

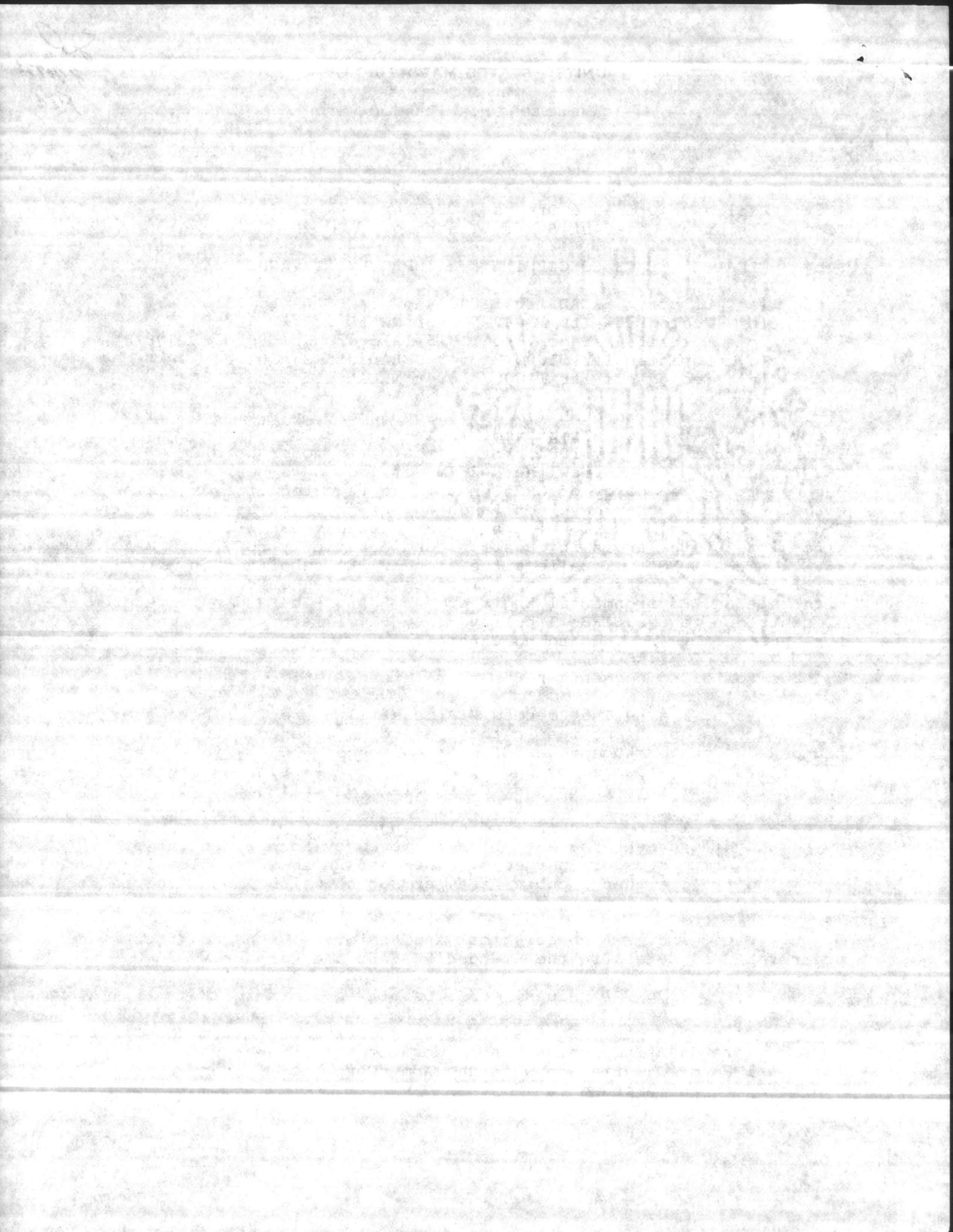
2. The following comments refer to reference (a):

a. Para. 1.a. - The Amended PEA is still correct. There are no known endangered species in the area to be cleared. The newly found Red-Cockaded Woodpecker Site is on Range K-303's right flank and will not be affected by the clearing. The American Alligators and their habitat in Whitehurst Creek will be avoided during clearing.

b. Para. 1.b. - Ditching and clearing operations in the Whitehurst and Mill Creek area have been reviewed by Earnie Jenkins of the U. S. Army Corps of Engineers. Increase fresh water flow is estimated at less than 5 cubic feet per second which is an acceptable amount.

c. Para. 1.c. - Archaeological and Historical considerations are covered in detail in the Amended PEA and are correct.

d. Para. 1.d. - A request for a permit to drain the K-2 wetlands was requested from the U. S. Army Corps of Engineers and has been accomplished. Correspondence is forthcoming from the Corps of Engineers granting permission to conduct the project under a "National Permit". Liaison with the Army Corps of Engineers was addressed in the Amended PEA.



e. Para. 1.e. - There is no requirement to file a Federal Consistency Statement with the North Carolina Office of Coastal Management because there will be no construction within 75' of tidal waters.

f. Para.1.f. - A Sedimentation Control Plan is not required to be submitted to the State of North Carolina as per SJA opinion of 10 September 1980. However, sedimentation control is addressed in the Amended PEA and good construction practices will be followed.

g. Para. 1.g. - This project is not a major federal action and does not require a EA. It is classified as Routine Range Maintenance and will not change the primary purpose of the Range.

h. Para. 2 - A Sedimentation Control Plan is not required to be submitted to the State of North Carolina as per SJA opinion of 10 September 1980. However, sedimentation control is addressed in the Amended PEA and good construction practices will be followed.

i. Para. 3 and 4 - I am not involved in these two projects.

j. Para. 5 - I don't agree that the SJA and the Environmental Engineer have provided inaccurate information. However, I do agree that there are some conflicts within the NREAD staff and other sections.

3. The following comments refer to reference (b):

a. Para. 1.a. - Previously addressed in this letter para.2.b.

b. Para. 1.b. - Previously addressed in this letter para. 2.d.

c. Para. 1.c. - Previously addressed in this letter para. 2.a.

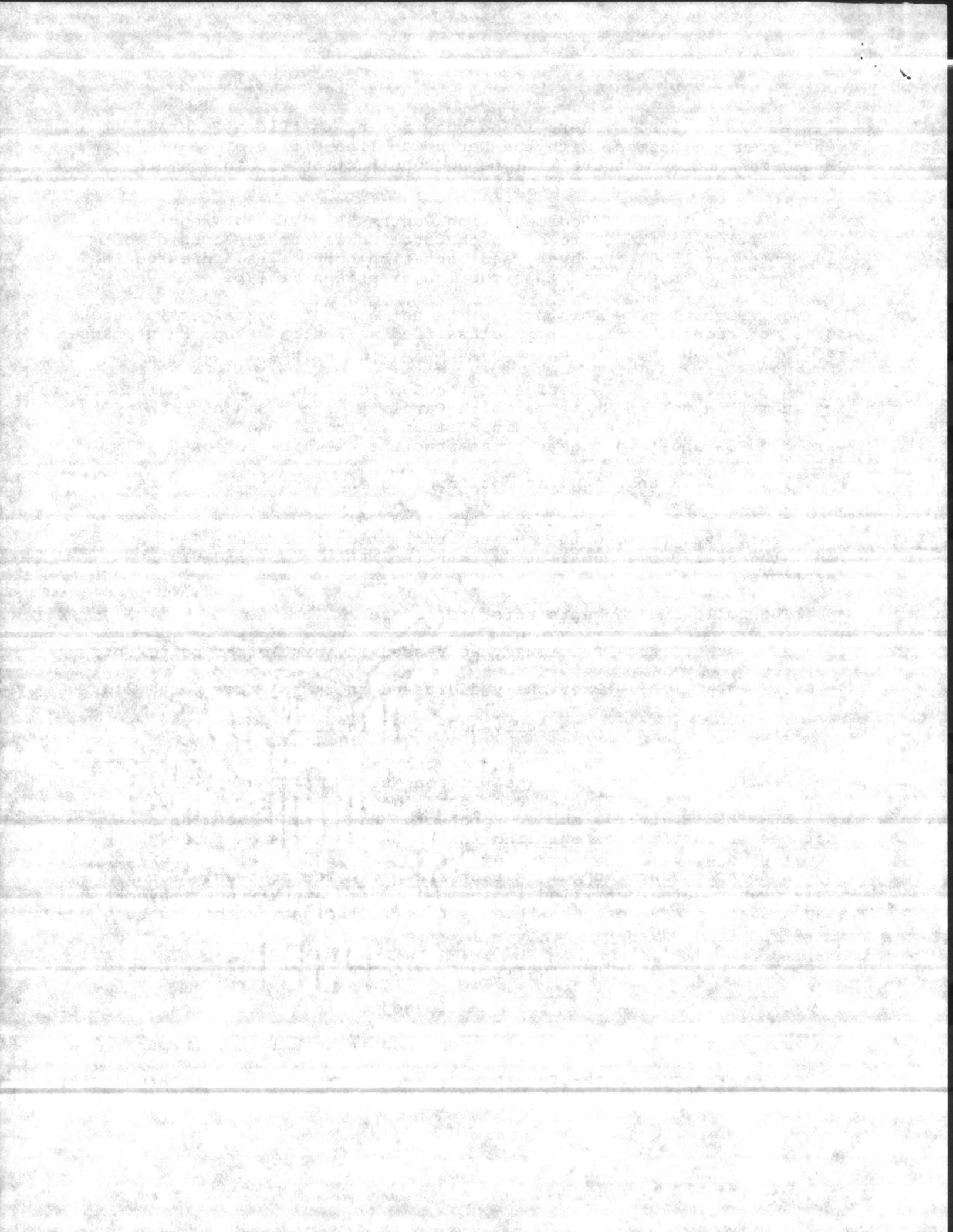
d. Para. 1.d. - The habitat of the American Alligator is addressed in this letter para. 2.a. The *Dionaea Muscipula* (Venus Fly Trap) and *Sarracenia* (Pitcher Plants) are identified as endangered species that MAY BE AFFECTED by the subject project. However, these plants have not been identified as existing in the K-2 Impact Area in any known previous studies. I believe these plants have been misclassified by NREAD as endangered but in fact are protected species. These same plants were identified in the G-10 Improvement Project by NREAD and to date no evidence has been submitted indicating that these plants were damaged.

e. Para. 2.a. - Previously addressed in this letter in para.2.e.

f. Para. 2.b. - Previously addressed in this letter in para. 2.f.

g. Para. 2.c. - Previously addressed in this letter in para. 2.a.

h. Para. 2.d. - Previously addressed in this letter in para. 2.g.



i. Para. 3 - Previously addressed in this letter in para. 2.g.

j. Para. 4 - I disagree; the K-2 project should be put before the EIRB. NREAD has advisory members on the EIRB and have the opportunity/responsibility to present the EIRB with all available information. It is the responsibility of the EIRB not NREAD to determine whether proposed projects meet all legal and moral requirements before recommending approval to the Commanding General. NREAD is the only agency at Camp Lejeune that is represented by two voting members (AC/S, Facilities and Base Maintenance Officer) on the EIRB. Even if the EIRB approves a project that does not meet with the approval of NREAD there are procedures for writing a Minority Opinion. The final decision rests with the Commanding General.

4. The following comments refer to reference (c):

a. Para. 1 - Previously addressed in this letter para. 2.a.

b. Para. 2 - Previously addressed in this letter para. 2.a.

c. Para. 3 - Previously addressed in this letter para. 2.b., 2.d., and 2.e.

d. Para. 4 - Previously addressed in this letter para. 2.c.

5. The following comments refer to reference (d):

a. I find no faults with the comments provided by the Base Forester. He obviously knows his job and has provided the most accurate information available.

b. It is my opinion that the sale of timber in K-2 is worthwhile. However, because of the short lead time remaining, I believe it will be overcome by events.

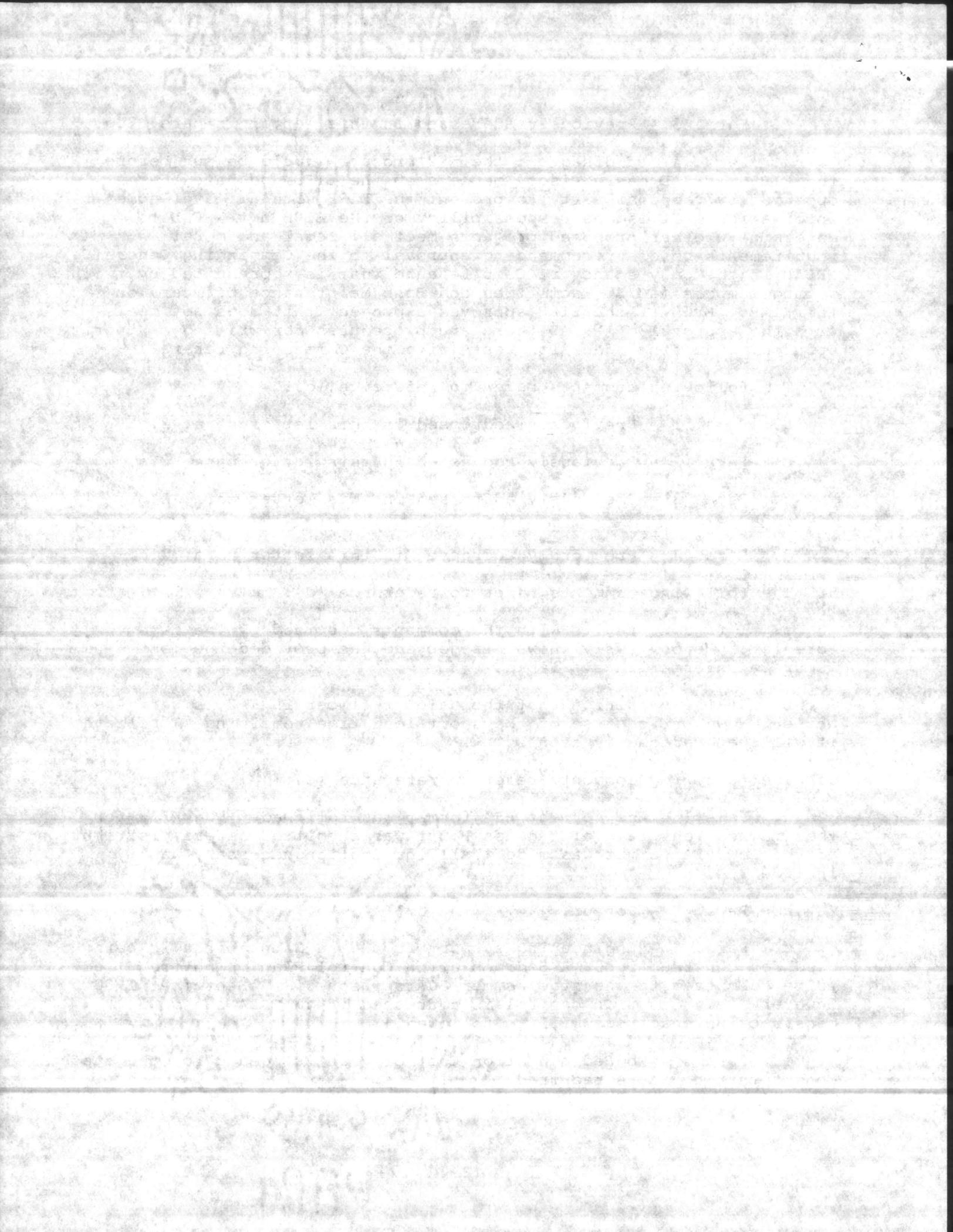
6. The following comments refer to reference (e):

a. Para 1 - The correct PEA format was followed. The PEA for the Tracked Vehicle Trail Rhodes Point was submitted before distribution of the new PEA format was made. All information necessary was included.

b. Para. 2 - Concur.

c. Para. 3 - Engineering support from Base Maintenance is being used for construction. A Sedimentation Control Plan is not required to be submitted to the state as per SJA opinion of 10 September 1980. However, sedimentation control is addressed in the PEA and good construction practices will be followed.

d. Para 4 - No Sedimentation Control Plan is needed for the state. Concur that no EA is required.



7. It is my opinion that any "Environmental Study" done on past or currently under way range projects will show that NO SIGNIFICANT ENVIRONMENTAL DAMAGE HAS BEEN DONE! I believe that we should and do follow the "Letter of the Law" but leave the interpreting of those laws to the legal experts. Additional information on the proposed projects is and has been available upon request for anyone having a valid interest. I believe it is time to stop throwing poison pens at each other and get to work fulfilling the mission of this base.

*H. B. Redmond Jr.*  
H. B. REDMOND JR.

Copy to:  
Range Control Officer



U.S. DEPARTMENT OF JUSTICE

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