

Appendix A: Public and Agency Comments

Public Comments:

The 30-day public comment period for the revised INRMP began January 5th, 2006 and ended February 6th, 2006. Copies of the INRMP were placed in libraries throughout Onslow County, North Carolina. It was also made available on the Camp Lejeune web site. In addition, a legal notice was published in the Jacksonville Daily News, the Base's "newspaper of record" for NEPA purposes. A news release was also sent to the Globe, the Base's weekly newspaper, for publication. No public comments were received during this time.

Federal and State Agency comments:



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1875 Century Boulevard
Atlanta, Georgia 30345

In Reply Refer To:
FWS/R4/F

NOV 14 2006

Mr. Scott A. Brewer
Director, Environmental Management Division
United States Marine Corps
Marine Corps Base
PSC Box 2004
Camp Lejeune, North Carolina 28542-0004

Dear Mr. Brewer:

The Fish and Wildlife Service's Raleigh Field Office and Southeast Regional Office have reviewed the latest revision of the Integrated Natural Resources Management Plan (INRMP) for the Marine Corps Base Camp Lejeune, North Carolina and have found that, pursuant to Paragraph (a) (2) of the Sikes Act (16 U.S.C. 670a et seq.), the Service and the Base are now in mutual agreement as to the plan's content.

We are providing this letter as recognition of our mutual agreement with regard to the INRMP. We also believe that this INRMP would be sufficient to exempt Marine Corps Base Camp Lejeune from future critical habitat designations for species currently known to occur on the Base and given our current understanding of the exemption criteria. However, actual exemption from critical habitat designation must be made at the time of rule making and following criteria in existence at that time.

Thank you again for the opportunity to comment on the INRMP for this facility. Your concern for and efforts to protect endangered and threatened species are greatly appreciated. If you have any questions, please feel free to contact me at 404/679-4000 or Mr. Tom Sinclair, Regional Sikes Act Coordinator, at 404/679-7324.

Sincerely yours,

for Sam D. Hamilton
Regional Director





☒ North Carolina Wildlife Resources Commission ☒

Richard B. Hamilton, Executive Director

MEMORANDUM

To: John R. Townson, CIV
Environmental Management
PSC Box 20004
Camp Lejeune, NC 28542-0004

From: Robert L. Curry, Chief
Division of Inland Fisheries

Date: July 11, 2006

RE: Camp Lejeune Integrated Natural Resource Management Plan (Plan) Comments

North Carolina Wildlife Resources Commission biologists appreciate the opportunities afforded us in the preparation of the Integrated Natural Resource Management Plan (INRMP) for Camp Lejeune. Our comments are provided in accordance with provisions of the Coastal Area Management Act (G.S. 113A-100 through 113A-128), as amended, the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et. seq.), the Clean Water Act of 1977 (as amended) and the North Carolina Environmental Policy Act (G.S. 113A-1 et seq., as amended; 1 NCAC-25).

MCB Camp Lejeune is commended on a well-prepared INRMP. We understand the difficulty encountered in the preparation of such a document. We also appreciate the continued effort on your part to include changes and additions in response to our previous comments. However, we continue to desire more detail in several areas as noted on the attachment and hope that you will allow us to review these noteworthy additions as developed. We understand the hesitation of including this additional detail in the main body of the INRMP. However, we have previously suggested an appendix dedicated to waterbirds similar to the existing appendix on sea turtles and with our last comments we provided an example for such an appendix.

Again, we are extremely pleased with the response and cooperative nature exhibited by MCB Camp Lejeune in the preparation of this plan. We **concur** with the Integrated Natural Resources Management Plan for Camp Lejeune and look forward to working out solutions to our additional concerns. Thank you for the opportunity to comment. If you have questions or require further information, please contact Steve Everhart at (910) 796-7217.

Outstanding concerns by the NC Wildlife Resources Commission

- **An official Audubon count:**

Section 6.2 discusses the Christmas Bird Count for migratory birds. Currently this count is not an official Audubon count and does not contribute to the Audubon dataset. We recommend that Camp Lejeune take the necessary steps to convert this count to an official Audubon count.

- **Protection of waterbirds using Onslow Beach:**

1. We have previously requested a detailed discussion on how, when and under what circumstances beach nourishment would occur. The two paragraphs added at the bottom of the sea turtle section (p. 4-15) do not fully address this concern. While it may not be an objective of the INRMP to nourish Onslow Beach, it might be an objective of Camp Lejeune in the future in order to protect structures. The INRMP should state that if disposal is planned, Camp Lejeune will avoid the bird and turtle moratorium windows and will work with NCWRC and other agencies to minimize impacts.
2. We continue to be concerned about public access to waterbird sites. While we understand the difficulty in obtaining a base order from the Commanding Officer in regard to waterbird management, we recommend that Environmental Management pursue that end for this and other waterbird management concerns. The plan notes that "... Camp Lejeune will post waterbird sites to discourage pedestrian impacts.", but gives no detail as to how this will be handled. We recommend that the signs state that public entry is prohibited, since the beach can still be accessed during the breeding season by boat and used by recreational boaters. An approach similar to the Bogue Inlet Waterbird Management Plan should be used. This approach maintains reasonable public access while giving significant protection to nesting waterbirds. This is an excerpt from that plan,

"The nesting area will be posted from April 1 through August 31 or until the last chick fledges and will consist of 2 x 2 inch posts placed approximately 30 feet apart. Most posts will support an 8½ x 11 inch sign that states "Waterbird Nesting Area - Do Not Cross Rope Barricade - No Trespassing". The NCWRC phone number will be listed on the signs for people to report wildlife violations and obtain information on nest area protection. Additional 8½ x 11 inch educational signs will be placed on some posts to teach beach-goers about nesting waterbirds. Thin, white string will be tied waist high between each post to encourage people to stay out of the nesting area. Orange flagging will be tied along the string to make it more visible. Nesting area string and post fencing will be removed at the end of the breeding season.

In order to balance public access with the protection of nesting waterbirds, the spit will be posted in a manner so that a maximum of 70% of the land from the first line of vegetation to the mean high water (i.e., where dry sand ends) will be protected as a nesting area using string and post fencing. A minimum of 30%, which will include

land adjacent to the water, will remain open for public use. This will create a corridor along the shoreline and allow for public access to the oceanfront and inlet beach. If a bird nests outside of the roped area, the nest will be posted using posts only (no string). The signs will be placed 50 yards from the nest to prevent the bird from flushing off its eggs/chicks. The signs will not prohibit access to that land, but will urge beachgoers to stay outside of the area. They will read "Waterbird Nesting Area, Please Do Not Enter".

3. The plan notes on page 5-3 that "Also, Camp Lejeune has actively removed predators from Onslow Beach, and will do so again as appropriate." We request a description of how this removal activity will be determined and if nest success and/or predator populations will be monitored on Onslow Beach and reported.
4. Additional management details related to waterbirds were requested and not included. These included an enforceable leash law on Onslow Beach and a map of important nesting areas to be included. We recommend that the current leash law be referenced.
5. As with point 2 above, we understand the difficulty in obtaining a base order from the Commanding Officer in regard to waterbird management, we recommend that Environmental Management pursue that end for this and other waterbird management concerns. Since vehicles are permitted on the south end outside of the nesting season, we feel it may be necessary to have a protected area for foraging shorebirds during the non-breeding season. Again we suggest incorporating protections like those found in the Bogue Inlet Waterbird Management Plan such as the following example text:

"Vehicles will be allowed on the spit during the driving window, but will be restricted to the shoreline area (within 150 feet of normal high tide) and required to stay out of designated foraging/roosting areas. Signs will be erected at widely spaced intervals along the upper beach to direct traffic to the shoreline area. It is known that beach driving can have negative impacts on waterbirds (Pfister et al, 1992; USFWS, 1996). Beach driving has the potential to negatively impact birds by crushing birds roosting in tire tracks, causing roosting and foraging birds to flush and degrading nesting and foraging habitat. For this reason, vehicle use will be monitored on an annual basis and the "No Vehicle" zone will be modified if it is determined that vehicles are having a negative impact on foraging and roosting birds and/or on waterbird habitat."

Literature Cited

- Pfister, C., B.A. Harrington and M. Lavine. 1992. The impact of human disturbance on shorebirds at a migration staging area. *Biological Conservation* 60: 115-126.
- USFWS, 1996. Piping Plover (*Charadrius melodus*), Atlantic Coast Population, Revised Recovery Plan. Hadley, Massachusetts. 258 pp.



North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor
William G. Ross Jr., Secretary

Division of Marine Fisheries

Preston P. Pate Jr., Director

August 22, 2006

John R. Townson, CIV
Environmental Management
PSC Box 20004
Camp Lejeune, NC 28542-0004

Dear Mr. Townson:

The NC Division of Marine Fisheries appreciates the opportunity given to us to comment on the Integrated Natural Resource Management Plan (INRMP) for Camp Lejeune. Staff biologists have participated in meetings and have reviewed the document.

Marine Corps Base Camp Lejeune is to be commended on the preparation of this INRMP document. This was a monumental task and done well. The NC Division of Marine Fisheries **concurs** with the Integrated Management Plan for Camp Lejeune and looks forward to working closely with you on future projects.

Thank you for the opportunity to comment. If you have questions or require further information, please contact Fritz Rohde at (910) 796-7370.

Sincerely,

Preston P. Pate, Jr., Director
NC Division of Marine Fisheries

PPP/FR/bl

cc: Fritz Rohde



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Raleigh Field Office
Post Office Box 33726
Raleigh, North Carolina 27636-3726

February 27, 2006

Mr. Scott A. Brewer, PE
Director, Environmental Management Division
Marine Corps Base
PSC 20004
Camp Lejeune, North Carolina 28542-0004

Dear Mr. Brewer:

The Fish and Wildlife Service (Service) has reviewed your January 2006 Draft Integrated Natural Resource Management Plan (INMRP) and associated Draft Biological Assessment (BA) forwarded to this office under your cover letter dated January 4, 2006. The purpose of the INRMP is to guide natural resource conservation programs on Marine Corps Base, Camp Lejeune, Onslow County, North Carolina and to ensure that the Base's lands remain environmentally viable in support of the installation's military mission. The Draft INRMP represents a revision of the 2001 INRMP. The revision is considered necessary to account for guidance contained in the Service's Red-cockaded Woodpecker (*Picoides borealis*; RCW) Recovery Plan, 2nd Revision (Service 2003); to modify protective measures that apply to military training activities associated with RCW conservation, based on the results of the recently completed Military Impact Study; and to establish appropriate conservation programs for federally listed species that would enable Camp Lejeune to preclude critical habitat from being designated on the installation, in accordance with the 2004 National Defense Authorization Act. Our comments are provided in accordance with section 7(a)(1) and 7(a)(2) of the Endangered Species Act (Act) of 1973, as amended (16 USC 1531 et seq.).

The 2006 INRMP revision is intended to provide clear instruction for installation natural resource managers to adequately promote conservation of native flora and fauna while sustaining a reusable war-fighter training landscape. Camp Lejeune performs irreplaceable roles in both natural resource conservation and preparing the readiness of Marine fighting forces in defense of our Nation. The revised INRMP demonstrates Camp Lejeune's commitment to integrate natural resource conservation and military mission requirements in a mutually beneficial manner.

The INRMP references a provision of the National Defense Authorization Act of 2004 that enables Department of Defense installations to work with the Secretary of Interior to preclude critical habitat designation on their lands if acceptable conservation measures are written into the approved INRMP. Such an INRMP would need to provide a benefit to threatened and endangered species; the installation would need to provide certainty that the conservation expressed in the plan would be implemented; the plan must be effective in achieving the stated conservation objectives; and should be developed with cooperating agencies including the Service.

Camp Lejeune is home to eight federally listed species, including the RCW, green turtle (*Chelonia mydas*)(Threatened) loggerhead turtle (*Caretta caretta*)(Threatened) rough-leaved loosestrife (*Lysimachia asperulaefolia*) (Endangered), seabeach amaranth (*Amaranthus pumilus*)(Threatened),

bald eagle (*Haliaeetus leucocephalus*)(Threatened) and piping plover (*Charadrius melodus*)(Threatened). A record of the federally listed plant, pondberry (*Lindera melissifolia*) was detected in 2004 but was not confirmed during the 2005 growing season. Of these species only the piping plover has had critical habitat designated by the Service in the State of North Carolina. The closest critical habitat to Camp Lejeune was identified at New Topsail Inlet, just south of the installation. No critical habitat has been designated on Camp Lejeune.

Camp Lejeune believes that the INMRP provides the conservation benefits necessary to preclude the necessity to designate critical habitat on the installation for any species currently known to occur there. We concur with Camp Lejeune's determination that the requirements for precluding the designation of critical habitat, as provided for under the National Defense Authorization Act of 2004 have been met. This determination must be revisited if: (1) new information reveals impacts of this identified action that may affect listed species in a manner not previously considered; (2) this action is subsequently modified in a manner that was not considered in this review; or, (3) a new species is listed that may be affected by the identified action.

Camp Lejeune's current contribution to RCW recovery is a tribute to the efforts of all land management communities on the installation administering programs under the currently operational 2001 INRMP and Mission-compatible Long Range RCW Management Plan of 1999 (1999 RCW Management Plan). Camp Lejeune's RCW population has been consistently monitored since 1986. This monitoring has documented a 161% increase in population size from 31 active clusters in 1986 to 81 in 2005. The number of potential breeding pairs has increased by an average rate of 9% since 1990. These achievements are substantial and provide a standard for all other major federal lands with RCW recovery objectives to observe and emulate.

The revised INRMP features close coordination within the forestry, wildlife and endangered species programs to ensure the Plan is fully implemented. Forest management will continue to maintain a forested environment meeting the needs of the military mission and multiple uses (e.g. clean water, clean air, outdoor recreational opportunities, high quality wood products, etc.) and to benefit the people that work and live at Camp Lejeune and local communities. While working to support these objectives, the installation is shifting forest management to also take into account RCW habitat features that were not traditionally quantified and to promote longleaf pine restoration in a manner that minimizes impacts to native ecological communities.

The revised INRMP introduces the practice of partition-level management to facilitate more accurate application of silvicultural techniques that would advance base-wide RCW recovery. The use of partition-level management will enable natural resource staff to prioritize stand-level treatments in a manner that meets the various habitat-related recovery objectives (e.g. conversion of offsite pine species to longleaf pine, thinnings and hardwood depletion, etc.) in the appropriate time-scale. This management technique will allow forest managers the flexibility to apply stand treatments to partitions needing more immediate attention than the prescribed 10-year cycle.

Forest management described in the draft INRMP will include guidance for restoring longleaf pine into stands currently occupied by offsite species in a manner that minimizes short-term interference of RCW population objectives and that optimizes potential benefits to RCWs in the long term. Stand thinning will be performed in a way that conserves relict trees and maximizes the ability for

treated stands to approach good quality foraging habitat as defined in the RCW Recovery Plan (Service 2003). The installation will use natural regeneration methods and prescribed burning as the primary seedbed preparation method where sites allow.

The revised INRMP includes prescribed burn scheduling based on a Prescribed Burning Prioritization Model. This program assigns priorities based on factors such as time since last burn, RCW cluster maintenance and recruitment cluster preparation. The annual prescribed burning goal for the five-year period addressed by the draft INRMP is approximately 20,000 to 25,000 acres. The installation is minimizing the insertion of new plow lines by using the natural firebreaks (streams, swamps, lakes, etc.) wherever possible. While the INRMP recognizes prescribed burning as the preferred method of midstory hardwood control, the installation has numerous tools for controlling hardwoods in stands being managed to provide good quality RCW foraging habitat. We believe the guidance the draft 2006 INRMP provides regarding RCW management practices are necessary to allow Camp Lejeune's RCW populations to continue to grow at acceptable rates.

The draft INMRP and associated draft BA have identified sources of incidental take of RCWs that may occur in implementation of the revised INRMP. The Base's 1999 RCW Management Plan and the Service's 1999 Biological Opinion identified the potential for incidental take to occur regarding various forest management and training-related activities in the Greater Sandy Run Area (GSRA) for the period covered by that plan. There were no known active clusters within the GSRA in 1999. The Biological Opinion authorized take on as many as 50 active clusters in the GSRA for a five-year period. Camp Lejeune's installation recovery goal (173 active clusters) does not rely on the formation of any recruitment clusters within the GSRA to be achieved. Therefore Camp Lejeune suggests that this level of incidental take for any existing or future RCW groups formed in the GSRA should be authorized in the implementation of this Proposed 2006 INRMP. We believe the information contained in the draft INMRP and associated draft BA is sufficient to enable the Service to evaluate potential effects to RCWs in the GSRA.

At the time of implementation, the Base's 1999 RCW Management Plan was covered by an incidental take statement for the potential loss of up to six RCW groups in the Base cantonment areas, incidental to infrastructural development. There were no known active RCW clusters in the cantonment area. Camp Lejeune's installation recovery goal doesn't require the formation of recruitment clusters in the cantonment area to be met. Therefore, the installation suggests that the level of take authorized for the 1999 RCW Management Plan (six active clusters) be considered appropriate for the 2006 revised INRMP. We believe the draft INRMP and BA documents contain sufficient information to evaluate potential effects to RCWs in the Base cantonment area.

The 1999 RCW Management Plan and its related BA included a "may adversely affect" determination regarding the construction and operation of a Mechanized Assault Course (MAC) in proximity to five RCW clusters in the G-10 Impact Area. The Service's 1999 Biological Opinion authorized incidental take on up to five existing RCW clusters in the vicinity of the project. However, the MAC was not constructed.

The 2006 draft INMRP and BA suggest that future development associated with the 2020 Range Transformation Plan could cause the removal of as many as seven active clusters in the G-10 Habitat Management Area (HMA). The Service is aware of the role RCW groups in the G-10

HMA serve in maintaining stability within the sub-populations on Camp Lejeune. Further, the RCW Recovery Plan reveals greater detail regarding population dynamics of this species that were relatively unknown during creation and review of the installation's 1999 RCW Management Plan. In a meeting hosted by your staff on July 27, 2005 John Hammond of the Service's Raleigh Field Office suggested that Camp Lejeune confer with Dr. Jeffery R. Walters to run a spatially-specific population dynamics model (referred to as the Letcher model) to evaluate the potential impact the range construction may have on RCWs. We are aware that the model has been run using population-specific information from Camp Lejeune and that the examination indicates destabilizing effects to Camp Lejeune's base-wide RCW population are likely.

Continued discussion on the 2020 Range Transformation Program should include a review of the model simulation report and a detailed review of any pertinent information regarding the installation's ability to offset, avoid, or minimize habitat fragmentation related to the range development program. We are attaching the Service's "Implementation Procedures for Use of Foraging Habitat Guidelines and Analysis of Project Impacts under the Red-cockaded Woodpecker Recovery Plan: Second Revision" to serve as a starting point for developing the information the BA would need to appropriately assess the 2020 Range Transformation Program element of the draft 2006 INRMP.

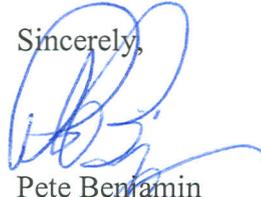
A new source of incidental take of RCWs is related to Camp Lejeune's interest in adopting the 1996 U.S. Army Guidelines for RCW protection and plans to implement a strategy to increase RCW population growth, decrease military training restrictions and continue monitoring impacts to RCW groups during training (referred to as "High-use Training Areas, Population Milestones, and Monitoring"). This process will require the installation to promote RCW population growth in areas that were previously considered low priority for RCW growth (e.g. High-use Training Areas; HUTAs). Although clusters and associated foraging habitat established in HUTAs will be managed consistent with the Recovery Standard, these clusters will not be marked and will be subject to incidental take from military training activities. The Draft BA states that unmarked clusters on Camp Lejeune will not be considered supplemental (according to the Army-wide guidelines) and may not be subject to incidental take at the time Camp Lejeune meets its recovery goal. We believe the draft BA and draft INRMP contain sufficient information regarding this proposed strategy to enable the Service to evaluate its affects according to section 7 of the Act.

Camp Lejeune has recently changed its regulations for recreational driving on Onslow Beach. Recreational driving south of the south tower is prohibited from April 1 through August 31. We believe this regulation will be beneficial to nesting sea turtles, the seabeach amaranth and migratory birds, including the piping plover.

Page 4-2 of the INRMP contains a list of federally listed species that are known to occur seasonally in the waters adjacent to Camp Lejeune (Whales, sea turtles not known to nest on Camp Lejeune, shortnose sturgeon, etc.) and indicates that the installation will consult with National Oceanic and Atmospheric Administration-Fisheries for actions that may affect marine species. Please note that the West Indian manatee (*Trichechus manatus*) falls under the authority of the Service. We are attaching guidance for protecting manatees where projects are proposed in aquatic environments that may contain manatees.

The Service recognizes Camp Lejeune's commitment to protection and recovery of federally listed species and appreciates the installation's contributions to conserving fish, wildlife and their habitats for the continuing benefit of Marines, Sailors, and the American people. If you have any questions regarding this matter, please contact Mr. John Hammond at (919) 856-4520 (ext. 28). Thank you for your continued cooperation with our agency.

Sincerely,



Pete Benjamin
Ecological Services Supervisor

cc: Ralph Costa, USFWS
Tom Sinclair, USFWS



North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor

February 6, 2006

William G. Ross Jr., Secretary

Col. Adele Hodges
AC/S
I&E/EMD/ECON
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

Dear Col. Hodges:

Thank you for the opportunity to comment on the draft Integrated Natural Resource Management Plan (INRMP).

The North Carolina Natural Heritage Program recognizes both the importance of Camp Lejeune to the military training mission of the Marine Corps, as well as the unique ecological asset the Base represents to the conservation of North Carolina's natural diversity. We appreciate that the INRMP strives to balance the conservation of rare plants, rare animals and the most significant natural communities with the Corps's training mission.

We applaud the decision reflected in the INRMP to continue protection of the two Registered Natural Heritage Areas, Longleaf Pine Ridge and Wallace Creek Swamp. We are also pleased to note that protection has been extended to the rarest natural communities on the Base. These rare communities constitute significant resources to the State of North Carolina and, in some instances, the Nation. Wherever possible, we recommend that all other habitats within natural areas which have been identified by the Natural Heritage Program be given similar protection.

We also applaud the inclusion of regional conservation considerations in the INRMP, particularly continued participation in the Onslow Bight Forum. This initiative, recognized by the White House, continues to be an excellent forum for the identification of shared priorities among the Corps and the State.

We appreciate the strong relationship we share with Camp Lejeune and look forward to its continuation.

Sincerely,

Linda Pearsall

Director, NC Natural Heritage Program



☒ North Carolina Wildlife Resources Commission ☒

Richard B. Hamilton, Executive Director

MEMORANDUM

To: John R. Townson, CIV
Environmental Management
PSC Box 20004
Camp Lejeune, NC 28542-0004

And

Melba McGee, Environmental Coordinator
DENR/Office of Legislative and Intergovernmental Affairs
1601 Mail Service Center
Raleigh, NC 27699-1601

From: Steven H. Everhart, PhD
Southern Coastal Coordinator
NCWRC/Habitat Conservation
127 Cardinal Drive Ext.
Wilmington, NC 28405

Date: February 3, 2006

RE: Camp Lejeune Integrated Natural Resource Management Plan Comments (OLIA Project No. 06-0217, Due Date 02/06/2006)

North Carolina Wildlife Resources Commission biologists appreciate the opportunities afforded us in the preparation of the Draft Integrated Natural Resource Management Plan (INRMP) for Camp Lejeune. Our comments are provided in accordance with provisions of the Coastal Area Management Act (G.S. 113A-100 through 113A-128), as amended, the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et. seq.), the Clean Water Act of 1977 (as amended) and the North Carolina Environmental Policy Act (G.S. 113A-1 et seq., as amended; 1 NCAC-25).

MCB Camp Lejeune is commended on a well-prepared draft INRMP. It is extremely well-organized and represents numerous man-hours of analysis and preparation. We understand the difficulty encountered in the preparation of such a document and feel that you have done outstanding work. We also appreciate the continued effort on your part to include changes and additions in response to our previous comments.

We offer the following recommendations in regard to the INRMP:

- Currently, MCB CL is doing a good job with its sea turtle management and should be encouraged to continue. A few things relevant to turtles should be addressed in the document, in the spirit of completeness.
 - Page 4-2: the leatherback is listed as occurring in the water only. However, given the recent increase in leatherback nests in NC over the past several years, and given that leatherbacks nested on Bogue Banks in 2005, it is possible that Onslow Beach will be used by nesting leatherback females in the near future. The current management plan covers this possibility, but we feel leatherback nests should be recognized as a *distinct* possibility.
 - DEA (Appendix A) page 1-4: nourishment may also have impacts on sea turtles and their nests.
 - DEA (Appendix A) page 3-2: loggerhead and green turtles should be added to the list of T&E species that occur in waters off the beach.
- Beach nourishment needs to be addressed (under what conditions, if any will Onslow Beach receive dredged material). This either needs to be addressed in the INRMP or in the Onslow Beach Master Plan and referenced in the INRMP. The potential effect of beach nourishment to various wildlife species should be stated in the INRMP, and what might be done to ameliorate for these impacts if beach nourishment is necessary to protect structures, to maintain training areas, etc.
- Section 5.1.3 states "Impacts from human disturbance are not considered a likely threat." Thus posting waterbird nest sites will not prohibit foot traffic. Even low levels of human disturbance inside colonial waterbird and shorebird nesting sites can inhibit or cause abandonment of nesting waterbirds. We feel Onslow Beach should prohibit foot traffic around these traditional nesting areas (and around new areas as they are established during the nesting season). As requested, below is a list of other federal, state and privately owned locations in NC that follow this protocol. This includes almost every site where colonial waterbirds and shorebirds nest with regularity:
 - Federal
 1. Cape Lookout National Seashore
 2. Cape Hatteras National Seashore
 3. Pea Island National Wildlife Refuge
 4. Currituck national Wildlife Refuge
 5. Woods Island (Bogue Sound)
 6. Raccoon Island (Pamlico Sound)
 - State
 1. All Wildlife Resources Commission owned islands

2. Hammocks Beach State Park
 3. Fort Fisher State Recreation Area
 4. Rachel Carson Estuary NCNERR
 5. Bird Isle NCCR
 6. Masonboro Island NCNERR
- Private
1. Lea Island
 2. Hutaff Island
 3. Sunset Beach
 4. Bald Head Island
 5. Wrightsville Beach
 6. Figure Eight Island
 7. Emerald Isle
 8. All Audubon owned islands

Additionally, management would include protection of the colonies/nests from predation. As an enclosure to this memorandum, we have provided the waterbird management plan for Bogue Inlet/Town of Emerald Isle. Modification of this plan and its inclusion in the INRMP, much as the red-cockaded woodpecker recovery plan has been, would greatly improve the INRMP in regard to the management of waterbirds.

- Section 10.2 suggests that dune creation will restore foraging habitat for piping plovers. We recommend that any reference to piping plover habitat be removed from this section. Overwash is extremely important for roosting and foraging plovers and the creation of dunes actually destroys piping plover habitat by eliminating overwash and preventing its creation.

Again, we are extremely pleased with the response and cooperative nature exhibited by MCB Camp Lejeune in the preparation of this important document. We look forward to a continued close working relationship with its preparers. Thank you for the opportunity to comment. If you have questions or require further information, please contact me at (910) 796-7436.

Encl-1 Bogue Inlet Waterbird Management Plan



North Carolina
Department of Administration

Michael F. Easley, Governor

Britt Cobb, Secretary

February 24, 2006

Mr. Tom Barbee
United States Marine Corps
PSC Box 20004
Camp Lejeune, NC 28542-0004

Dear Mr. Barbee:

Re: SCH File # 06-E-0000-0217; EA; Draft Integrated Natural Resource Management Plan (INRMP) for Marine Corps Base (MCB) Camp Lejeune (January 2006) is available at <http://www.lejeune.usmc.mil/emd>. The INRMP will replace the initial November 2001 publication

The above referenced environmental impact information has been submitted to the State Clearinghouse under the provisions of the National Environmental Policy Act. According to G.S. 113A-10, when a state agency is required to prepare an environmental document under the provisions of federal law, the environmental document meets the provisions of the State Environmental Policy Act. Attached to this letter for your consideration are the comments made by agencies in the course of this review.

If any further environmental review documents are prepared for this project, they should be forwarded to this office for intergovernmental review.

Should you have any questions, please do not hesitate to call.

Sincerely,

Chrys Baggett / srb

Ms. Chrys Baggett
Environmental Policy Act Coordinator

Attachments

cc: Region P

Mailing Address:
1301 Mail Service Center
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Telephone: (919)807-2425
Fax (919)733-9571
State Courier #51-01-00
e-mail Chrys.Baggett@ncmail.net

Location Address:
116 West Jones Street
Raleigh, North Carolina



North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor

William G. Ross Jr., Secretary

MEMORANDUM

TO: Chrys Baggett
State Clearinghouse

FROM: Melba McGee *MB*
Environmental Review Coordinator

SUBJECT: 06-0217 Camp Lejeune Integrated Natural Resource Management
Plan

DATE: February 20, 2006

The Department of Environment and Natural Resources has reviewed the proposed information. The attached comments are for the applicant's information.

Thank you for the opportunity to review.

Attachments

1601 Mail Service Center, Raleigh, North Carolina 27699-1601
Phone: 919-733-4984 \ FAX: 919-715-3060 \ Internet: www.enr.state.nc.us/ENR/

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North Carolina Department of Environment and Natural Resources
Division of Coastal Management

Michael F. Easley, Governor

Charles S. Jones, Director

William G. Ross Jr., Secretary

February 6, 2006

Melba McGee
Environmental Coordinator
Office of Legislative & Intergovernmental Affairs
Department of Environment and Natural Resources
1601 Main Service Center
Raleigh, NC 27699-0001

SUBJECT: Draft Integrated Natural Resource Management Plan for Marine Corps Base Camp Lejeune, Onslow County, North Carolina (SCH#06-0217, DCM#20060005)

Dear Ms. McGee:

Thank you for the opportunity to review the U.S. Marine Corps' draft update for the "Integrated Natural Resource Management Plan for Marine Corps Base (MCB) Camp Lejeune" (IRMP) in Onslow County, North Carolina. Additionally, the draft environmental assessment on the draft IRMP was also reviewed. According to the request for review, the environmental process is in the "Draft" phase and has been distributed for comment. The purpose of the draft phase is to solicit comments regarding the adequacy of the draft environmental assessment (Draft). DCM's comments will be on both documents. DCM has not reviewed the other appendixes.

The proposed action will be occurring within Onslow County; a coastal county within the meaning to the Coastal Zone Management Act of 1972, as amended (CZMA). The CZMA requires that Federal agencies proposing activities¹ within a State's coastal zone provide the State, in this case, the NC Division of Coastal Management with a consistency determination prior to implementing the activity to document that the proposed activity complies with the enforceable policies of North Carolina's approved coastal management program and will be conducted consistent with the State's coastal program. Conformance of the proposed Federal activity with the enforceable policies of the State's certified coastal management program was not evaluated in the Draft.

Though **not** a requirement, 15 CFR 930.37 allows a Federal agency to use its NEPA documents "as a vehicle" for its consistency determination. Inclusion of the consistency analysis into the environmental documents simplifies the environmental review process and focuses the decision-making process by condensing the required documentation into one document. At this point in time, the Marine Corps may

¹ Federal activities subject to consistency review are specified in 15 CFR 930.31. The term "Federal agency activity" means any functions performed by a Federal agency, such as the adoption of a management plan, that will have a reasonably foreseeable effect on any coastal use or coastal resource.

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either incorporate the consistency analysis into the final IRMP and/or environmental assessment or it may prepare a stand-alone consistency determination. Additionally, DCM recommends that if the IRMP is to be used for consistency purposes that IRMP Sections 1.2.1 (Purpose), 1.2.5 (IRMP Resource Agency Coordination), 1.2.8 (Environmental Compliance), 2.4 (History and Land Use), 15.4 (Compliance with Other Environmental Requirements) be revised to incorporate a review of the proposed action with the Coastal Zone Management Act and North Carolina's coastal management program. DCM recommends that similar modifications be made to the environmental assessment. Prior to implementing the proposed IRMP the Marine Corps will need to submit to DCM a consistency determination and obtain the concurrence of DCM.

North Carolina's coastal zone management program consists of, but is not limited to, the Coastal Area Management Act, the State's Dredge and Fill Law, and the land use plan of the County and/or local municipality in which the proposed project is located. In preparing the consistency determination the USFWS will need to review these documents and to evaluate the conformance of proposed comprehensive conservation plan with the State's coastal program. The website for the Division of Coastal Management can be found at: <http://dcm2.enr.state.nc.us/index.htm>. The State's consistency webpage is located at: <http://dcm2.enr.state.nc.us/Permits/consist.htm>. Additionally, NOAA's Office of Ocean and Coastal Resources Management (OCRM) has a webpage on the consistency process at: http://coastalmanagement.noaa.gov/czm/federal_consistency.html.

The Marine Corps may also wish to broaden the scope of the IRMP to minimize the requirement of the Marine Corps to submit consistency determinations to DCM for proposed projects that are to be implemented under the IRMP. Pursuant to 15 CFR 930.33(4), the Marine Corps may request that environmentally beneficial activities be relieved from further consistency review by DCM. Potential activities under this approach would be proposed habitat enhancement projects and the proposed removal of exotic and non-native plants.

Additionally, 15 CFR 930.36(c) allows for general consistency determinations. Under this section of the Federal Regulations, the Marine Corps may request a onetime concurrence from DCM for proposed projects that are repetitive where the incremental actions do not affect coastal resources when performed separately. Silviculture activities, as discussed in Chapter 7 (Forest Management), potentially apply. DCM suggests that the Marine Corps review CAMA §113A-103(5)(b) for other types of activities that the Marine Corps may wish to have included in a general consistency determination for implementing the proposed IRMP.

The draft IRMP is deficient in land-use style graphics². For example, page 3-7 of the environmental assessment notes the existence of two natural areas. However, no graphic depicting these areas seem to be contained in the draft IRMP. Action Item 5-01 (on page 2-3 of the environmental assessment) calls for the designation of conservation areas when the protection would not interfere with military training areas. DCM encourages the Marine Corps to provide land-use style graphics in the final IRMP.

The draft IRMP discusses the existence of the Greater Sandy Run Wetland Mitigation Bank (Page 9-2 of the IRMP). Many proposed activities, such as the recently approved modifications to the SR-7 range³, will use mitigation credits from the Greater Sandy Run Wetland Mitigation Bank. To formally track the creation/use/balance of these credits DCM recommends the implementation of an "accounting" system to

² DCM acknowledge the implications of the text on page 1-4 of the environmental assessment that states "The ESA was amended to prohibit the designation of critical habitat for endangered species on a military installation when the Secretary of the Interior determines that the installation's INRMP provides a benefit to that endangered species."

³ Consistency concurrence CD05-046 dated September 26, 2005.

document the mitigation credits available in the Greater Sandy Run Wetland Mitigation Bank. DCM suggests that the implementation of the accounting system also be added as an action item to the IRMP.

DCM commends the Marine Corps for taking an ecosystem approach to managing Camp Lejeune's natural resources as outlined in Section 1.4.2 (Ecosystem Management Approach) of the draft IRMP.

Should the Marine Corps have any questions on the consistency process relative to the proposed IRMP, I would encourage the Marine Corps to give me a call. Thank you for your consideration of the North Carolina Coastal Management Program.

Sincerely,



Stephen Rynas, AICP
Federal Consistency Coordinator

cc: Charles Jones, Division of Coastal Management
Doug Huggett, Division of Coastal Management
Tere Barrett, Division of Coastal Management
Martin Korenek, US Marine Corps, Camp Lejeune



☒ North Carolina Wildlife Resources Commission ☒

Richard B. Hamilton, Executive Director

MEMORANDUM

To: John R. Townson, CIV
Environmental Management
PSC Box 20004
Camp Lejeune, NC 28542-0004

From: Steven H. Everhart, PhD
Southeastern Permit Coordinator
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Date: August 10, 2005

RE: Camp Lejeune Integrated Natural Resource Management Plan Comments

North Carolina Wildlife Resources Commission biologists attended the meeting to discuss the Preliminary Draft Integrated Natural Resource Management Plan (INRMP) for Camp Lejeune held on July 27, 2005 and are familiar with wildlife resources in the area. Our comments are provided in accordance with provisions of the Coastal Area Management Act (G.S. 113A-100 through 113A-128), as amended, the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et. seq.), the Clean Water Act of 1977 (as amended) and the North Carolina Environmental Policy Act (G.S. 113A-1 et seq., as amended; 1 NCAC-25).

We share concerns with the US Fish and Wildlife Service (USFWS) and the NC Division of Marine Fisheries (DMF) and offer the following comments in regard to the Plan:

Section 4.3.6 - Piping plovers

- 1) States "...suitable habitat is available for nesting and overwinter foraging." It should be noted that Onslow Beach is also important for migrating birds and contains habitat not just for foraging but also for roosting.
- 2) This section also states that protective measures will be put in place for nesting piping plovers if a nest is found. Protective measures may be warranted if a pair is present during the breeding season even if a nest isn't found. Birds need to be able to court and set up nesting territories without disturbance. We previously recommended posting the

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best habitat by April 1st. If breeding behavior is observed in areas outside of the posted areas, these areas should also be protected.

- 3) There is no mention of beach stabilization and efforts to minimize impacts to piping plovers (as well as other waterbirds). This should be addressed somewhere in the Plan since disposal, nourishment, artificial dune creation, etc. can negatively impact piping plovers and other waterbirds.
- 4) If possible, Brown's Island should be surveyed for breeding and non-breeding piping plovers.

Section 5.1.3 - Shorebirds and Colonial Nesting Waterbirds

- 1) States that "Traditional nesting sites and new nesting sites will be protected as conservation areas." We recommend that nesting areas be posted with symbolic fencing (post/rope/signs) April 1 - Aug. 31st. Human disturbance and predator issues should be addressed. There should be specific language that says how nesting areas for piping plovers as well as other non-listed beach nesting birds will be posted.
- 2) States "...protected as conservation areas only where such protection does not interfere with military training". There are many things that could and should be done that don't interfere with training. Some discussion of activities that will be accomplished should be provided.

Section 5.1.4 - Other Species

- 1) The following species should probably be included:
painted bunting (federally listed as a species of special concern and Lejeune is extremely important to the state's population); eastern coral snake (state listed as endangered); timber rattlesnake, southern hognose snake, pigmy rattlesnake, common tern (all state listed as a species of special concern). There may be some small mammals as well...check most recent Natural Heritage list.
- 2) Onslow Beach/Browns Island should be surveyed for the new species of skipper found on Radio Island. This butterfly is also found on Bear Island which is just north of Browns Island and Onslow Beach.
- 3) There should be some discussion on the needs of the Eastern Painted Bunting, and the military's commitment to providing shrub/scrub habitat for this bird.
- 4) No mention is made of fresh water fish species that may inhabit the many ponds and freshwater streams aboard Camp Lejeune. We expect Fritz Rohde (DMF) to provide further comment on this matter.

Section 6.1 Migratory Birds

Other conservation plans applicable to Camp Lejeune include:

- Waterbird Conservation for the Americas - The North American Waterbird Conservation Plan (<http://www.waterbirdconservation.org/pubs/>)
- The U.S. Shorebird Conservation Plan (<http://www.fws.gov/shorebirdplan/>)

Section 11.3.5 Waterfowl

- NCWRC needs to be able to coordinate air space in the New River for winter waterfowl surveys
- Some coastal waterfowl species need to be added.

Section 11.4 Sport Fisheries Management

- Creel and/or population sampling surveys should be part of management and evaluation of management efforts.

Appendix – RCW Management Plan

4.4.8 - While the preliminary results of the marked vs. unmarked clusters study may demonstrate no difference in rates of abandonment between the two treatments, there are no data presented (nor collected) to indicate that there was a difference in training activity between marked and unmarked clusters. This study should not be used as justification for reducing the marking radius from 200 feet around the cluster perimeter to 50 feet around each cavity tree.

In General

MCB Camp Lejeune is commended on a well-prepared draft INRMP. It is extremely well-organized and represents numerous man-hours of analysis and preparation. We understand the difficulty encountered in the preparation of such a document and feel that you have done outstanding work.

However, we are disappointed that our concerns expressed with the Beach Management Plan provided over a year ago were not addressed in this version of the INRMP. Since beach nourishment has the potential to affect piping plovers, this is a major concern.

This issue and the other beach issues have direct impact on the exemption you are seeking from critical habitat. NCWRC must agree that the INRMP satisfies us with respect to piping plover issues.

Beach nourishment can have impact on sea turtles as well. The plan should include a very detailed discussion of how, when, and under what circumstances beach nourishment would occur. We could find no such description in this document. Beach issues were not sufficiently addressed in the last INRMP and, as yet, they have not been addressed in the current Plan.

Thank you for the opportunity to comment on this INRMP. If you have questions or require further information, please contact me at (910) 796-7436.