

ROUTING SLIP APR 24 1982

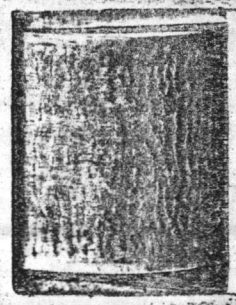
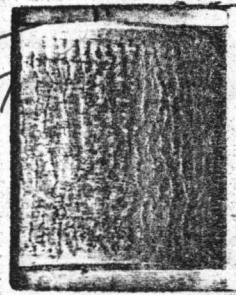
ACTION INFO INITIAL

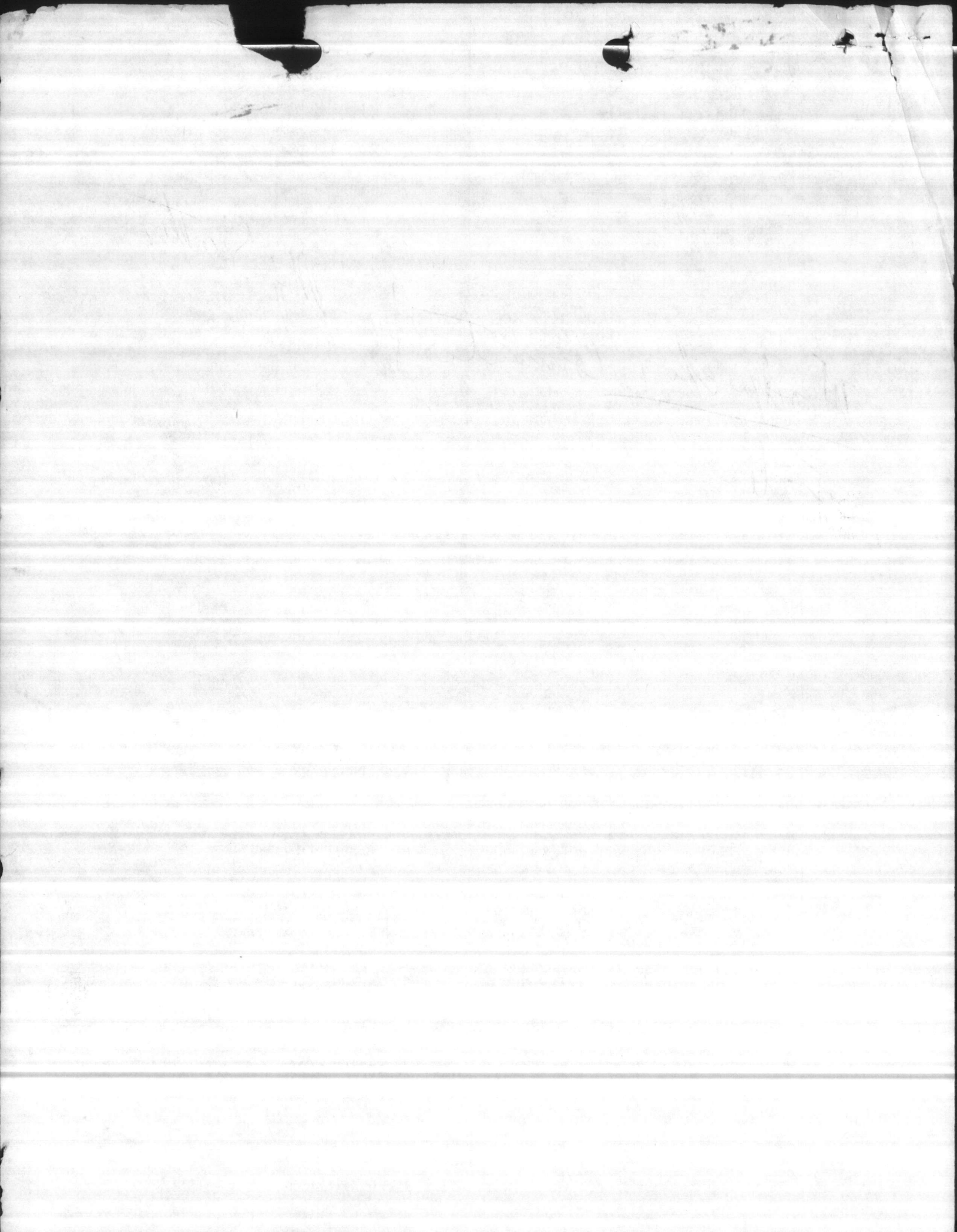
BMO			
ABMO		✓	<i>SW</i>
ADMIN			
ENVIOR AFF	✓		
F&A SEC			
MAINT NCO			
M&R			
OPNS			
PROP			
UMACS			
UTIL			
SECRETARY			

COMMENTS:

*Woodpecker Comments from Maj. Sautter*

*File*







ASSISTANT CHIEF OF STAFF, FACILITIES  
HEADQUARTERS, MARINE CORPS BASE

Date 23 Mar 82

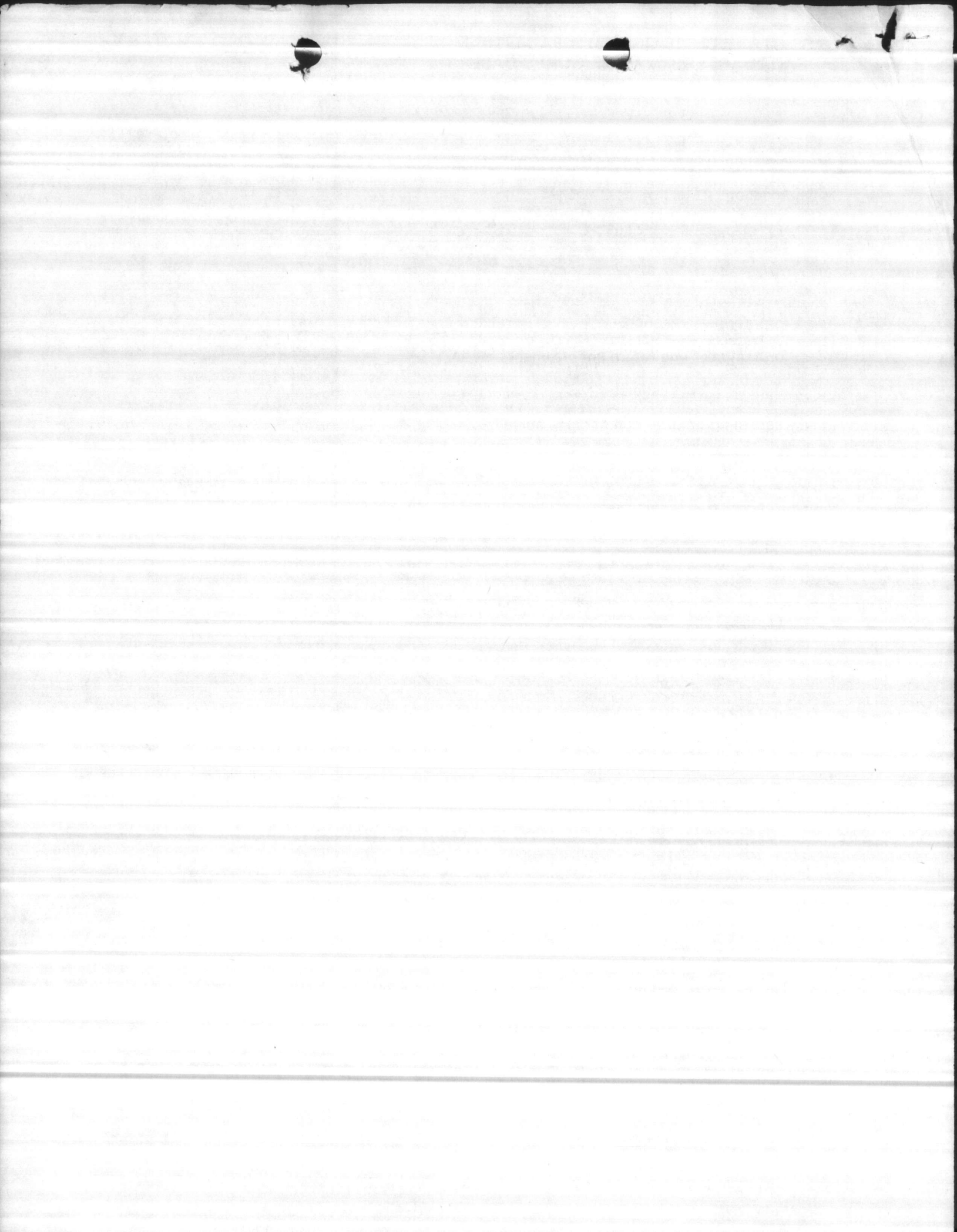
To: [Base Maintenance Officer] Col Mount  
Public Works Officer  
Communications - Electronics Officer

Subj: STIA comment on Endangered  
Species Violations

1. Forwarded, approved.
2. Forwarded, for information action.
3. Forwarded, for comment and return endorsement hereon.
4. Forwarded, requesting cost estimate.
5. Forwarded, requesting light/air conditioning survey.
6. Forwarded, for your files.

7. In light of recent violations of endangered species habitats, I thought that you'd be interested in a comments by Maj Scudder, (Envr Counsel) while she was reviewing a preliminary staff study on <sup>the</sup> environmental mgmt program.

VIR  
JMM





OFFICE OF THE STAFF JUDGE ADVOCATE  
Marine Corps Base  
Camp Lejeune, North Carolina 28542

CLO/LLS/bp  
5800  
18 March 1982

From: Civil Law Officer

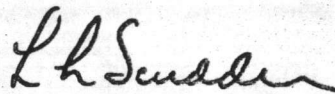
To: Major Marapoti

Subj: Environmental Staff Study

1. After examining the subject staff study, it is apparent that one of the results of the current environmental office organization includes ongoing violations of laws for which the Commanding General may be liable.
2. It is recommended that the following language be added to the first paragraph on page 9 following the word "initialed" on line 20:

"Currently there is reason to believe that there are ongoing violations of some or all of the foregoing laws. This is evident by the lack of hazardous materials/wastes collected and properly disposed of at Marine Corps Base. Typical materials would include motor oil, battery acids and solvents, all of which are used in large quantities at this command. The fact that these used materials are not being collected and stored at the center designed for that purpose nor disposed of by Property Disposal in accordance with pertinent regulations indicates that these materials are being improperly disposed of. Suspected forms of improper disposal includes dumping into drains and storm sewers, pouring directly onto the ground or burial. The result of such improper disposal would include run-off or leachage into area water supplies, affecting water quality both at Camp Lejeune and areas downstream.

"Another area of concern regards the Endangered Species Act. An environmental study located the areas of habitation by the red cockaded woodpecker and these areas were clearly marked by painting rings around selected trees and by signs indicating the restricted area. Violations of these zones occur so frequently (approximately weekly) and are so flagrant (foxholes, tree-cutting, tracked vehicle entry and sign destruction) that such violations must be characterized as intentional. The ongoing damage is documented, photographed and reported, but it is apparent that little or no effort is being made to curtail the destruction. As a result, the habitat protected by law is being destroyed, thereby further endangering this protected species."

  
L. L. SCUDDER

