



MARINE CORPS RECRUIT DEPOT/EASTERN RECRUITING REGION PO BOX 19001
PARRIS ISLAND, SOUTH CAROLINA 29905-9001

5090 Ser G4/045

#### MEMORANDUM FOR THE RECORD

From: Commanding General

To: Files

Subj: FINDING OF NO SIGNIFICANT IMPACT FOR THE FOCUSED ENVIRONMENTAL ASSESSMENT ADDRESSING REPAIR OF THE 3RD BATTALION POND CAUSEWAY AT MARINE CORPS RECRUIT DEPOT PARRIS ISLAND, SOUTH CAROLINA

Ref: (a) Council on Environmental Quality, National Environmental Policy Act Implementing Regulations, 40 CFR Parts 1500-1508

(b) MCO 5090.2 Environmental Compliance and Protection Program

1. <u>Situation</u>. Pursuant to the 2020 Council on Environmental Quality regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508) Implementing the National Environmental Policy Act, Navy Regulations (32 CFR § 775), and Marine Corps Order 5090.2, the United States (U.S.) Marine Corps gives notice that a focused Environmental Assessment (EA) has been prepared and an Environmental Impact Statement is not required for the following activities at Marine Corps Recruit Depot (MCRD) Parris Island.

#### 2. Proposed Action

- a. The Marine Corps proposes to repair the 3rd Recruit Training Battalion (3rdBn) Pond Causeway at MCRD Parris Island, South Carolina. Repair entails rehabilitation of the roadway on top of the causeway and construction of two channels to replace the existing reinforced concrete pipe (RCP) culverts. Roadway rehabilitation would entail resurfacing the entire 4,500-foot-long road on top of the causeway with an 8-inch cement stabilized base course and a 4-inch asphalt wearing surface to create a smooth profile. Areas that require further repair would receive full depth replacement of the sub-base. Roadway repairs would provide a pavement service life of 25 years or more; however, resurfacing of the wearing surface would be expected at 6 to 10 years.
- b. The six 84-inch-diameter RCPs that compose the two existing culverts between the marsh and the ponds would be replaced with two 33-foot-wide open channels. The open channels would be lined with interlocking steel sheet piles to eliminate the opportunity for water intrusion to create sinkholes beneath the roadway and cause further roadway settlement. Two flat slab bridges would span the channels. Each bridge would be a single span constructed from reinforced concrete with an 18-inch-thick slab and 20-foot approaches. Each bridge would be 51 feet, 7.5 inches wide and accommodate two 12-foot-wide travel lanes, two 10-foot-wide shoulders, and a single 5-foot-wide sidewalk. The service life of the open channels and bridge system would be 50 to 75 years.
- c. Construction is anticipated to begin during the spring of 2024 and conclude in the summer of 2025. The road atop the 3rdBn Pond Causeway would be closed to all traffic during this period to allow for concurrent roadway

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rehabilitation and construction of both channels and bridges. All traffic would use Malecon Drive to enter and depart the Depot.

3. <u>Purpose and Need</u>. The purpose of the Proposed Action is to ensure public safety and structural standards of the 3rdBn Pond Causeway and to maintain redundant vehicle access to MCRD Parris Island. The Proposed Action is needed because the 3rdBn Pond Causeway is one of only two access roads onto MCRD Parris Island and the causeway is deteriorating to the point that it will no longer meet structural standards and will require closure to ensure public safety. Closure of the causeway would eliminate redundant access to MCRD Parris Island and require all traffic to use Malecon Drive.

## 4. Alternatives Analyzed

- a. The Marine Corps analyzed the Proposed Action and the No Action Alternative in the focused EA. The Marine Corps considered various alternatives including constructing a land bridge on top of the causeway, constructing a water bridge through the marsh adjacent to the causeway, and sliplining the existing RCPs; however, these alternatives were eliminated from analysis in the focused EA for failing to meet several selection standards.
- b. No Action Alternative. For the No Action Alternative, the Marine Corps would not repair the 3rdBn Pond Causeway at MCRD Parris Island. Rehabilitation of the roadway on top of the causeway, construction of the two channels to replace the existing RCP culverts, and construction of two flat slab bridges would not occur. The existing culverts would remain in service, and water intrusion at the headwalls would continue to create sinkholes beneath the roadway potentially exposing contaminated fill material. The 3rdBn Pond Causeway would continue to deteriorate and reach a point where it would no longer provide safe vehicular access for the Depot. Closure of the causeway would eliminate redundant access to MCRD Parris Island by diverting all traffic onto Malecon Drive. The No Action Alternative would not meet the purpose and need as described above and is not considered a reasonable alternative, although this alternative was carried forward for purposes of analyses.
- 5. Environmental Effects. As summarized below, the environmental resource areas analyzed in the EA include Biological Resources, Water Resources, Land Use (including Coastal Consistency Determination), Hazardous Materials and Wastes, Cultural Resources (including visual impacts), Utilities and Transportation, Air Quality, and Noise. Because potential impacts were negligible or nonexistent, the following resource areas were not evaluated in the EA: Airspace, Geological Resources, Golden Eagles, Health and Safety, South Carolina Department of Health and Environmental Control (SCDHEC) Critical Area Regulation, Socioeconomics, and Environmental Justice. The level of detail in the summary analysis is commensurate with the level of potential effect to the resource.

## a. Biological Resources

(1) Construction would require the temporary and complete impoundment of the 3rd Battalion Ponds using coffer dams to prevent tidal inundation during construction. The loss of tidal exchange during construction would result in temporary water quality impacts to the ponds due to stagnation and evaporation from increased water temperature and salinity and decreased

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dissolved oxygen content. Aquatic organisms inhabiting the ponds may experience a decline in habitat and resource availability (i.e., food, shelter) from evaporation and temporarily have increased risks of desiccation and predation. However, to minimize adverse impacts of elevated temperatures and low dissolved oxygen content on aquatic biota within the ponds, the temporary coffer dams would be used only during the coldest months (i.e., October 2024 to April 2025).

- (2) Potential impacts on protected species are expected to be minimal as most species are not expected to be in the project area. Conservation measures would be used to avoid and minimize effects to the maximum extent practicable.
- (3) Impacts on migratory birds would occur if construction coincides with the breeding season of those species with the potential to nest within the project area. Construction may adversely affect nesting birds and their young, but these impacts would be temporary and limited and would depend on the duration of the construction activities. The U.S. Fish and Wildlife Service National Standard Conservation Measures would be followed to minimize impacts on migratory birds.
- (4) A single, active bald eagle nest is known to exist within the project area. This nest is within 0.5 mile of the causeway but outside of the 660-foot National Bald Eagle Management Guidelines minimum distance for a construction activity to avoid disturbance to the nest. New, additional nesting by bald eagles in the active construction zone is unlikely; if new nests are identified prior to construction within 0.5 mile of the active construction zone, the National Bald Eagle Management Guidelines would be followed. Additional bald eagles have the potential to occur in the vicinity of the project area and use the 3rd Battalion Pond or tidal marsh habitat for feeding. For these reasons, the Proposed Action may affect, but is not likely to adversely affect the bald eagle.
- (5) The Proposed Action has potential to impact Essential Fish Habitat (EFH) through the temporary impoundment of the ponds and loss of tidal exchange during construction. Temporary impacts may include changes to water quality and temperature, increased risks of desiccation and predation to organisms inhabiting the pond, and reduced resource availability (i.e., food, shelter) which, in turn, could result in temporary changes to the species composition and community structure until tidal exchange to the ponds is resumed. Few permanent impacts on EFH are expected, and these impacts result from the loss of approximately 0.06 acre due to the placement of fill (riprap). However, the Proposed Action would also provide an ecological benefit for oyster reef habitat by providing structure for colonization (up to 0.13 acre), resulting in a net gain of up to 0.07 acre of EFH. It is anticipated that there would be no impacts to the managed species that have the potential to use EFH within or in the vicinity of the project area.
- (6) No sensitive plant communities have been identified within the project area. The areas disturbed during construction would primarily consist of maintained areas of bermudagrass and minimal salt marsh vegetation. To the maximum extent practicable, the Proposed Action would be implemented in stages so that only areas that are in active construction are exposed. Additionally, the proposed construction is not expected to result in the introduction or spread of any non-native vegetation.

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- (7) Therefore, the Proposed Action would not result in significant impacts to biological resources.

#### b. Water Resources

- (1) The permanent loss of approximately 0.06 acre of tidal area wetlands from rip-rap placement would result in minor, adverse impacts. These impacts would occur at the outfalls of the existing RCPs and would be necessary to protect the new channel from being undermined from tidal forces, and the bulk of the work would occur in the existing footprint of the causeway and existing culverts. Clean Water Act permitting would be required for wetland impacts and coordinated with the Pre-Construction Notification under the Nationwide Permit requirements and limitations. Of all alternatives considered, the Proposed Action would result in the least environmental damage regarding potential jurisdictional Waters of the United States, and there is no practicable alternative to the Proposed Action. The Proposed Action would include all practicable measures to minimize harm to wetlands that may result from construction. The Proposed Action complies with Executive Order (EO) 11990.
- (2) Impacts on floodplains would occur because some construction would occur within the Federal Emergency Management Agency-designated flood Zone X. Of all alternatives considered, the Proposed Action would result in the least environmental damage regarding floodplains, and there is no practicable alternative to the Proposed Action. The Proposed Action would not entail construction of any facilities deemed too risky to be sited within a floodplain and would not endanger public health or safety by creating or worsening flood hazard conditions. The Proposed Action complies with EO 11988.
- (3) Therefore, the Proposed Action would not result in significant impacts to water resources.

## c. Land Use

- (1) The Proposed Action would be compatible with the existing and future land use of the Support District, and land use controls for OU 3 (Causeway Landfill) would continue. Construction plans would be approved by MCRD Parris Island, The U.S. Environmental Protection Agency (USEPA), and SCDHEC because demolition of the existing RCP culverts, introduction of the new sheet piles, construction of bridge pile foundations, and relocation of underground utilities have the potential to penetrate the remedial cover over the fill material. With these approvals, no impacts on land use would occur.
- (2) A federal coastal consistency assessment identified no effects on the coastal zone from the Proposed Action. The Proposed Action would occur entirely within the boundaries of MCRD Parris Island and would not affect state resources and qualifies for a Negative Determination under the Coastal Zone Management Act.
- (3) Therefore, the Proposed Action would not result in significant impacts to land use.

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#### d. <u>Hazardous Materials</u> and Wastes

- (1) Impacts would occur from the use of hazardous materials and petroleum products and the generation of hazardous wastes during construction. Contractors would be responsible for the disposal of hazardous wastes in accordance with federal and state laws. All hazardous materials, petroleum products, and hazardous wastes used or generated would be contained, stored, and managed appropriately in accordance with applicable regulations to minimize the potential for releases. Construction equipment would be maintained according to the manufacturer's specifications and drip mats would be placed under parked equipment as necessary.
- (2) Impacts would occur from potential disturbance of contaminated materials associated with OU 3. Contaminated material encountered during construction would be managed in accordance with federal, state, and local regulations to minimize impacts on human health and the environment. A project-specific Waste Management Plan would be developed and approved by MCRD Parris Island, USEPA, and SCDHEC, and soil, sediment, and landfill waste removed from the boundaries of OU 3 would be managed in accordance with the Waste Management Plan.
- (3) Therefore, the Proposed Action would not result in significant impacts to hazardous materials and wastes.

#### e. Cultural Resources

- (1) The causeway—including the two reinforced concrete culvert structures being demolished and replaced under the Proposed Action—was not completed until 1975 and was modified in 2000 with the addition of the current paved road. Therefore, the causeway is not considered to be a historic structure of significance.
- (2) Construction would not occur within the footprint of any archaeological site. Construction of new weirs at both culverts would ensure the current water storage capacity of the ponds is maintained, and no impacts would occur to Site 38BU2045, located on the northeast edge of the southern 3rd Battalion Pond. MCRD Parris Island has applied the Assessment of Adverse Effects, found in 36 CFR Part 800.5, to this undertaking and has determined that it would not adversely affect any significant cultural resources including Site 38BU2045. The South Carolina State Historic Preservation Officer has concurred with this determination. MCRD Parris Island has also consulted with federally recognized Native American tribes on this determination.
- (3) Therefore, the Proposed Action would not result in significant impacts to cultural resources.

# f. Utilities and Transportation

(1) Construction would result in a temporary, negligible increase in the demand for electricity from the operation of electric-powered tools and a construction office trailer. Temporary and short duration electric and communication service interruptions might occur when service lines are relocated. No long-term changes to utility demand or capacity would occur.

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- (2) Impacts on transportation would occur during construction. The temporary closure of the causeway during construction would eliminate redundant access to the Depot and require all traffic, including construction-related traffic, to use Malecon Drive to access the Depot. Although Malecon Drive has sufficient capacity, heavier traffic volumes might be noticeable at the beginning of the workday, at lunch, and at the end of the workday. Increased traffic volumes might also be noticeable on U.S. Route 21 in Port Royal and on Malecon Drive from construction workers and equipment arriving and leaving the Depot; however, the volume of daily construction traffic is anticipated to be a negligible proportion of the total traffic volume. No long-term changes to traffic volumes or patterns would occur.
- (3) Therefore, the Proposed Action would not result in significant impacts to utilities and transportation.

#### g. Air Quality

- (1) Emissions of criteria pollutants and greenhouse gases (GHGs) would be directly produced from the operation of heavy construction equipment, heavy duty diesel vehicles hauling materials, construction workers commuting daily, and ground disturbance; however, these emissions would be temporary in nature and only produced when construction activities are occurring. The air pollutant of greatest concern is particulate matter, such as fugitive dust, generated from ground-disturbing activities and combustion of fuels in construction equipment. Best management practices (BMPs) and environmental control measures would be incorporated to minimize fugitive dust emissions, which could reduce uncontrolled particulate matter emissions by approximately 50 percent. Air emissions produced would not meaningfully contribute to the potential of global climate change and would not noticeably increase the total GHG emission produced by the state. No long-term impacts on air quality would occur.
- (2) Therefore, the Proposed Action would not result in significant impacts to air quality.

## h. Noise

- (1) Impacts on the ambient sound environment in the vicinity of the causeway would occur from construction activities. Noise levels from construction would vary depending on the types of equipment being used and the distance to the receptor from the generating source. With multiple items of equipment operating concurrently, noise levels would be high within several hundred feet of the construction site and some people living or working near the causeway may notice or be annoyed by the construction noise. Pile driving would be the loudest activity associated with construction and confined to the culvert locations. The nearest housing may experience up to 127 A-weighted decibels from pile driving. Although this sound level is very loud, it would be consistent with that already experienced from weapons and explosives training exercises at MCRD Parris Island's ranges. BMPs would be employed during construction to reduce adverse noise effects.
- (2) Therefore, the Proposed Action would not result in significant impacts to noise.

# i. Reasonably Foreseeable Actions and Environmental Trends

- Subj: FINDING OF NO SIGNIFICANT IMPACT FOR THE FOCUSED ENVIRONMENTAL ASSESSMENT ADDRESSING REPAIR OF THE 3RD BATTALION POND CAUSEWAY AT MARINE CORPS RECRUIT DEPOT PARRIS ISLAND, SOUTH CAROLINA
- (1) The Marine Corps identified only a handful of reasonably foreseeable actions anticipated to occur on MCRD Parris Island during the timespan of the Proposed Action (i.e., 2024 and 2025), and each action would not have a reasonably close causal relationship to the Proposed Action (40 CFR 1508.1(g)). These actions would only be connected to the Proposed Action through construction-related traffic accessing the Depot. When the causeway is temporarily closed during construction, all traffic would use Malecon Drive to access the Depot. Malecon Drive is anticipated to have sufficient capacity to accommodate the 4,968 daily vehicles that use the causeway, the construction-related traffic associated with the Proposed Action, and the construction-related traffic associated with the reasonably foreseeable actions.
- (2) No specific environmental trends have been identified for the MCRD Parris Island region. The 3rd Battalion Pond Causeway would be susceptible to the environmental trends from climate change whether the Proposed Action is implemented. However, the Proposed Action may improve the Marine Corps' resilience to climate change environmental trends by improving vehicle access onto the Depot and protecting the remedial cover of OU 3 during floods and from sea level rise.
- (3) Therefore, the Proposed Action would not result in significant impacts when also considering reasonably foreseeable actions and environmental trends.
- 6. <u>Public Involvement</u>. For this project, which will affect lands within the boundaries of MCRD Parris Island, a project Factsheet and the Final focused EA were published to the Depot's website and public notices were published in The Beaufort Gazette and The Island Packet. Questions pertaining to the focused EA can be directed to the Marine Corps at the following phone number: 843-228-4294.
- 7. Finding of no Significant Impact (FONSI). Based on analysis presented in the Final focused EA and FONSI, the Marine Corps finds that implementation of the Proposed Action will not significantly impact the quality of the human or natural environment or generate significant controversy. Therefore, the preparation of an Environmental Impact Statement will not be required.

WM Till