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September 20, 2012

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Richard K. Sullivan Jr., Secretary  
Executive Office of Energy and Environmental Affairs  
Attn: MEPA Office  
Nicholas Zavalas, EEA # 5834  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: Supplemental Environmental Impact Report – Massachusetts Military  
Reservation Small Arms Range Improvement Project (EEA # 5834)

Dear Secretary Sullivan:

The Association to Preserve Cape Cod (APCC) is a non-profit environmental organization dedicated to the preservation of Cape Cod's natural resources and quality of life. Founded in 1968 and currently representing 5,000 members, APCC is the oldest and largest environmental organization on Cape Cod.

On behalf of APCC and as an individual member of the MMR Science Advisory Council, I am pleased to submit comments on the SEIR – MMR Small Arms Range Improvement Project (EEA # 5834).

As the Massachusetts National Guard moves forward, under the oversight of the Environmental Management Commission and its advisory councils, with future projects and improvements to specific ranges in the Upper Cape Water Supply Reserve, mitigation action should be employed using a broader scope, Reserve-wide approach. APCC recommends that prior to, or concurrent with, improvements to the small arms ranges, mitigation and cleanup should be undertaken on all ranges within the Reserve, including those that are not slated for future improvements and those that are inactive. Such actions would entail removal of debris and residual infrastructure not covered by the Impact Area Groundwater Cleanup Study Program or the Installation Restoration Program, including, but not limited to, old targets, mounds, concrete, wiring, tracks, and tanks.

Additionally, APCC suggests mitigation of the stream bed (old jeep trail) erosion that runs from former A Range towards Wood Road. Recommended

3010 Main Street | P.O. Box 398 | Barnstable, MA 02630-0398

Toll Free: 1-877-955-4142 | Tel: 508-362-4226 | Fax: 508-362-4227 | [info@apcc.org](mailto:info@apcc.org) | [www.apcc.org](http://www.apcc.org)

mitigation would involve leveling the ground, planting native vegetation, and stabilizing the area until planted vegetation can create natural stabilization.

Lastly, there are discrepancies in how the southern boundary of the Reserve/Training Area of Camp Edwards is drawn on maps in the draft SEIR. APCC recommends that this boundary inconsistency in the maps be clarified and officially documented and included in all future documentation and reports.

Thank you for this opportunity to comment.

Sincerely,  
Tara Nye  
APCC, Staff Biologist

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