



September 1, 2020

Andrew Gottlieb
Executive Director

Keith J. Driscoll

BOARD OF DIRECTORS

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President

2 Randolph Road

Hanscom Air Force Base, MA 01731

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RE: Camp Edwards Multi-Purpose Machine Gun Range Environmental Assessment

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Dear Mr. Driscoll:

Jack Looney
Clerk

The Association to Preserve Cape Cod (APCC) has reviewed the Environmental Assessment (EA) for the proposed Multi-Purpose Machine Gun (MPMG) Range at Camp Edwards, Joint Base Cape Cod. Based on our review, APCC questions the thoroughness of the EA along with its findings of “no significant impact.” APCC calls for the completion of an Environmental Impact Statement (EIS) for the proposed project to carefully study the impacts this project would create, propose appropriate mitigation and reexamine the potential viability of the rejected project alternatives.

John Cumbler

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Founded in 1968, APCC is the leading regional nonprofit environmental advocacy and education organization on Cape Cod. Supported by thousands of members from every Cape Cod town, APCC’s mission is to promote policies and programs that foster the preservation of the Cape’s natural resources. APCC focuses its efforts on the protection of groundwater, surface water, and wetland resources, preservation of open space, the promotion of responsible, planned growth and the achievement of an environmental ethic.

Cheryl Lubin

Elysse Magnotto-Cleary

Blue Magruder

Eliza McClennen

Stephen Mealy

Kris Ramsay

Over the years, APCC has been actively engaged in actions to protect and restore the natural resources found on Joint Base Cape Cod. APCC was a leading voice in the 1980s and 1990s calling for cleanup of toxic plumes originating from the base that contaminated groundwater in the four Upper Cape towns. APCC also spearheaded efforts that led to the designation of Camp Edwards—the northern 15,000 acres of the base—as the Upper Cape Water Supply Reserve, which was created for the protection of drinking water resources and wildlife habitat and compatible military training.

Robert Summersgill

Taryn Wilson

According to the EA, the proposed MPMG project would be located at Camp Edwards on the Upper Cape Water Supply Reserve. The project consists of construction and operation of an eight lane MPMG range that would require 199.0 acres of land disturbance, including 170.5 acres of forest area that would be clear cut “to accommodate the range footprint, small arms range operations and control area facilities, utility extensions, access and maintenance road development, and firebreaks to reduce wildfire hazards from tracers and other ignition sources.” The project plan also includes approximately 5,197 acres (over one-third of the 15,000-acre Upper Cape Water Supply Reserve) that would be required for the MPMG range to accommodate the Surface Danger Zones area where projectiles fired on the range would land.

The EA analysis conducted by the MAARNG determined that the known and potential adverse impacts from the project would be “less than significant” on land use and cover, air quality and climate, noise, soils, groundwater, biological resources, infrastructure, and hazardous and toxic materials and wastes. The MAARNG concluded that no EIS would be required and no mitigation was necessary for any potential impacts the project may generate.

APCC finds the MAARNG’s conclusions to be questionable and unacceptable. Clearing 170.5 acres of forested land does have an impact on the area habitat, on loss of carbon sequestration value of the trees and on loss of valuable forest for water recharge for the Upper Cape's drinking water supply.

Habitat and Land Use Impacts

APCC maintains that there is a regional interest in preserving the unfragmented nature of Camp Edwards and the Upper Cape Water Supply Reserve. The proposed land clearing would be, by far, the largest single land clearing project on Cape Cod in recent memory. The loss of this forest cover on Cape Cod would, in and of itself, be a significant regional environmental impact.

As noted in the EA, Camp Edwards is “the largest intact area of relatively unfragmented forest remaining on Cape Cod and serves as an important refuge for wildlife which require large ranges of interior forest habitat.” The area also supports an important pitch pine-scrub oak barrens community. The Massachusetts Natural Heritage and Endangered Species Program has ranked the pitch pine-scrub oak barrens natural community as “Imperiled in Massachusetts.” According to the project EA, the footprint of the proposed MPMG range that is targeted for clearing consists of high value pine barrens habitat (pitch pine-scrub oak, pitch pine oak forest, immature pitch pine) as well as some disturbed land. The project area is also mapped for Priority and Estimated Habitat for Rare Species, some of which are associated with pitch pine-scrub oak barrens habitat.

Although the project's Single Environmental Impact Report filed for MEPA states that the MAARNG proposes to preserve 310 acres of forest and conduct active management of 551 acres of forest, these forests already exist and do not replace the forest area to be cleared by the project. No additional forested land will be created in place of the 170.5 acres.

Climate Impacts

The carbon sequestration value of the to-be-cleared forest will be a net loss in the total carbon sequestration contribution made by Cape Cod's forested lands. Massachusetts' State Hazard Mitigation and Climate Adaptation Plan (SHMCAP), which was codified in the state's 2018 Environmental Bond, stresses the use of nature-based solutions for climate adaptation and mitigation. It highlights the value of preserving forests for their use as an important source of carbon sequestration, stating that "Massachusetts forests currently absorb more than 15 percent of the carbon generated in Massachusetts every year." APCC strongly supports the state's policy to protect existing forestland as a means to address climate change.

In addition to the carbon sequestration loss of the forest if it is cleared, the anticipated increase in training activity at the base described in the EA will increase travel to the Cape and thus add to vehicle carbon emissions in Barnstable County, further exacerbating the local climate impact from this project.

Environmental Assessment Findings

Considering the above, it is therefore puzzling and rather implausible that the EA concludes the following in the analysis of potential impacts (emphasis is APCC's):

For land use and cover:

- The No Action Alternative (not going forward with the project) would have "long term, potential significant adverse impact on future land use from a reduction in training use of Camp Edwards."
- The Preferred Alternative would have "long-term, less-than-significant adverse impacts on land cover from clearing 170.5 acres and permanent conversion of forested areas to maintained grasslands," and a "long-term, beneficial impact on land use by maximizing training value of Camp Edwards."

For impacts to air quality:

- Long-term, less-than-significant adverse impact on climate change from continued vehicle-generated GHG emissions.
- Long-term, less-than-significant adverse impact on air quality from increased emissions due to training and firing operations.
- Long-term, beneficial impacts on air quality from decreased emissions due to reduced out-of-state travel.



For impacts to groundwater:

- The Preferred Alternative would have "long-term, less-than-significant adverse impacts on groundwater from inadvertent release of contaminants during site maintenance and training operations."

For biological impacts:

- The Preferred Alternative would result in "long-term, less-than-significant adverse impacts on vegetation from the permanent loss of 170.5 acres of forested land," "long-term, less-than-significant adverse impacts on wildlife species from potential habitat loss and training range operations," and "long-term, less-than-significant adverse impacts on special status species from potential habitat loss and training range operations."

Consideration of Other Alternatives

APCC questions whether land clearing of the scale described in the EA within the protected area of the Upper Cape Water Supply Reserve exceeds the threshold of "compatible training" as mandated in the establishment of the reserve. According to the EA, the potential alternative of choosing another MAARNG installation for the location of the training site was dismissed from further analysis. APCC wonders why such an alternative was quickly dismissed from consideration, when another base in Massachusetts may have the capacity for the training site and would result in less impact on environmentally sensitive land and natural resources.

Conclusion

It is clear to APCC that this project proposal needs to be revisited. An in-depth, comprehensive study of the major issue areas associated with the project needs to be conducted through the preparation of an Environmental Impact Statement, which must include a more thorough analysis of the potential adverse impacts the proposed large-scale forest clearcutting in this region of Cape Cod would have on carbon sequestration, rare species habitat, high-value pine barren natural communities and groundwater resources. Any analysis conducted in an EIS must also include a more serious look at appropriate mitigation and viable alternatives. More importantly, a reassessment of the project should examine the larger question of whether this project is an appropriate use for the Upper Cape Water Supply Reserve.

Sincerely,



Andrew Gottlieb
Executive Director