

**From:** [David Roth](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] NO gun range please!  
**Date:** Thursday, September 3, 2020 8:45:55 PM

---

Dear Mr. Driscoll:

The Cape Cod Climate Change Collaborative (Climate Collaborative) submits this letter in response to the request from the Massachusetts Army National Guard (MAARNG) for comment on its Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the proposed Multi-Purpose Machine Gun Range (MPMG) at Camp Edwards, Barnstable County, Massachusetts. The Climate Collaborative represents businesses, institutions, organizations and citizens of Cape Cod and the Islands of Nantucket and Martha's Vineyard, Massachusetts (Cape & Islands). Its mission is to unite the knowledge, resources, talent and tools of its hundreds of members to mitigate climate change impacts, reduce greenhouse gas emissions, protect natural processes of carbon sequestration and work toward achieving net zero-based goals for the Cape & Islands.

The broad-based membership of the Climate Collaborative Board includes leaders in finance and banking, housing, construction, environment and education, municipal and county government, and faith, youth, and civic climate activism. All are committed to mitigating the climate crisis, which on the Cape & Islands, has become an existential threat. The Climate Collaborative believes that, for the reasons described below, the EA and resulting FONSI are fatally deficient. The proposed MPMG project will have significant climate change impacts, which while ignored in the EA and FONSI, must be identified, quantified and thoroughly analyzed with input from the affected public as required by the National Environmental Act (NEPA).

Specifically, the EA: (1) fails to account for or quantify the obvious and foreseeable impacts stemming from the loss of carbon sequestration capacity in clear cut forest areas; (2) lacks a cumulative impacts analysis; (3) avoids the robust alternatives analysis and mitigation assessment that would be required under an EIS; and (4) fails to involve the affected public in the process, ignoring the past environmental history of pollution at Camp Edwards where remediation is still ongoing. The FONSI's unjustifiable conclusion that there is no significant impact from the proposed MPMG project lacks any support in the EA. For these reasons, the Climate Collaborative believes the EA and FONSI should be withdrawn and a new EA prepared in compliance with NEPA requirements, resulting in a recommendation that a full Environmental Impact Statement (EIS) be prepared.

Thank you for our time and consideration.

David Roth  
Orleans, MA

**From:** [Paula Schnepf](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Extension of Deadline for Public Comment for JBCC  
**Date:** Thursday, September 3, 2020 2:26:43 PM

---

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

---

Dear Mr. Driscoll:

I'm one of thirteen elected Councilors in the Town of Barnstable. Although our Town does not abut Joint Base Cape Cod and we were therefore not included in the list of state and local agencies contacted about the environmental assessment completed for the proposed machine gun range, we are very much affected by the activities conducted on the base.

This matter has come to my attention too late to include on tonight's agenda. What is the possibility of extending the deadline for Public Comment beyond September 7th as we are required to follow strict Open Meeting Laws on what we can discuss and vote on during our meetings.

I would appreciate a response before 4 p.m. this afternoon so I may plan accordingly for tonight's meeting.

Thank you.  
Paula Schnepf

--  
Paula Schnepf  
Barnstable Town Council, Prec. 12  
Marstons Mills, MA  
(508) 733-3475



< Caution-[https://www.avast.com/sig-email?utm\\_medium=email&utm\\_source=link&utm\\_campaign=sig-email&utm\\_content=webmail&utm\\_term=icon](https://www.avast.com/sig-email?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=webmail&utm_term=icon) >  
< #DAB4FAD8-2DD7-40BB-A1B8-4E2AA1F9FDF2 >

Virus-free. Caution-[www.avast.com](https://www.avast.com/sig-email?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=webmail&utm_term=link) < Caution-[https://www.avast.com/sig-email?utm\\_medium=email&utm\\_source=link&utm\\_campaign=sig-email&utm\\_content=webmail&utm\\_term=link](https://www.avast.com/sig-email?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=webmail&utm_term=link) >

**From:** [Roberta Shaw](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] National Guard machine gun range on Cape Cod  
**Date:** Thursday, September 3, 2020 9:50:26 AM

---

Dear Sir,

I write with great concern about the plans to build a machine gun range on Cape Cod without the opportunity for the residents of the area to engage in a public meeting.

The Cape has a very sensitive ecosystem and local scientists are quite concerned about losing as many trees as is being suggested. We believe this forest is an important climate change buffer and natural carbon sink.

I am a Navy brat, familiar with and supportive of our military's important role. I urge those involved in this decision to seek alternate locations for the range.

What about the Fort Devens Range Complex? Could that not be a reasonable solution? What other locations have been considered? Is it not possible to provide an opportunity for residents of the Cape to be part of this decision?

I appreciate your time and consideration, and this opportunity to request further information and involvement of the Cape community.

Respectfully,  
Roberta Shaw  
175 Gorham Rd  
Harwich Port, MA 02646

**From:** [Rosemary Shields](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Fwd: To: Keith J Driscoll, MAARNG, Machine gun range  
**Date:** Thursday, September 3, 2020 5:18:38 PM

---

To: Keith J Driscoll, MAARNG,  
2 Randolph Road, Hanscom Air Force Base, MA 01731, Keith.J.Driscoll.nfg@mail.mil.  
RE: A Multi-Purpose Machine Gun Range is to be installed at Camp Edwards, Joint Base Cape Cod.

As a year-round resident of Cape Cod I object to the installation of the machine gun range. The Cape has a single source aquifer and what happens on the land covering the aquifer leeches into the water supply. More than 5,000 acres would be required to accommodate the operation, since it would include the area where projectiles fired on the range would land, based on types of weapons and ammunition used. My assumption is the projectiles will be lead, a very toxic pollutant, and other heavy metals. I believe this area is still under Superfund supervision for toxic waste. How can that possibly contribute to water quality?

It is stated that the project would have no significant environmental impacts, yet it calls for clearing 170 acres of forest and disturbing about 199 acres of land. This is indeed a significant impact.

There is a machine gun range in Camp Ethan Allen in Jericho, Vermont, 270 miles away. Can the National Guard handle the logistics of transporting troops such a distance? I think this would be a great training exercise for you.

Range use at Camp Edwards introduces “significant wildfire hazard into unmanaged and high-risk fuels conditions, through the use of tracers (pyrotechnic charge to show trajectory) and ammunition,” the assessment says. This is unacceptable for the health and beauty of Cape Cod.

For the reasons stated above I am against this project.

Sincerely,  
Rosemary Shields  
P O Box 1283  
Harwich. MA. 02645  
774-273-0279

Commenter

#215

**From:** [Eileen Smith](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Gun range  
**Date:** Thursday, September 3, 2020 8:39:11 PM

---

I'd like to register my opposition to the gun range.

Thank you,

Eileen Smith

Sent from my iPad

**From:** [Mae Timmons](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Opposition  
**Date:** Thursday, September 3, 2020 9:30:29 PM

---

Commenter  
#216

Keith Driscoll  
Massachusetts Army National Guard 2 Randolph Road  
Hanscom Air Force Base, MA 01731

RE: Massachusetts Army National Guard – Camp Edwards Multi-Purpose Machine Gun Range Environmental Assessment and Finding of No Significant Impact

Dear Mr. Driscoll:

I am writing to express my staunch opposition to the proposed deforestation at Camp Edwards in order to build a machine gun practice range. Proponents of this project, and the EA and FONSI reports I have read about it, say that the forest clear cut will have no adverse impact. This is just impossible at worst and misguided at best. To lose 170 acres of forest and report that this loss of forest will not have a negative impact is blatantly ignoring and misrepresenting the degree to which our forest absorbs carbon dioxide emissions. To do this as climate change is being driven by rising levels of carbon in our Cape Cod environment is unthinkable.

I look forward to participating in a public hearing on this issue.

Sent from my iPhone

Mae Timmons  
213 Old Chatham Road  
Brewster MA 02631  
508-237-1170

**From:** [pat.vineis](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Proposed firing range  
**Date:** Thursday, September 3, 2020 1:39:01 PM

---

Commenter  
#217

Dear Mr. Driscoll,

I am writing with concerns about the proposed firing range. While I understand the role of a military base, what I do not understand is the reason behind locating the firing range in such close proximity to a residential and educational zone. Out of the 22,000 acres the base contains, surely there must be another suitable location.

I would appreciate your taking a few minutes to clarify the location decision process.

Best regards,

Pat Vineis

**From:** [Jane B. Ward](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Machine Gun training range proposal for JBCC- citizen feedback  
**Date:** Thursday, September 3, 2020 10:35:28 AM  
**Attachments:** [JW JBCC Machine Gun range letter to Keith Driscoll 3 Sept 20.docx](#)

---

Mr. Driscoll- please see my attached letter expressing my concern and opposition to the expanded machine gun training range proposed for Joint Base Cape Cod.  
I would appreciate your acknowledgment of receipt of my letter.

Thank you for your consideration,

Jane Ward, MD, MPH, Colonel (retired) USAF

To: Massachusetts Army National Guard

3 September 2020

Joint Force Headquarters

Hanscom Air Force Base, MA 01731

Mr. Keith J. Driscoll, MEPA/NEPA Manager

From: Jane Ward, MD, MPH, Colonel (retired) USAF

Centerville, MA

Dear Mr. Driscoll,

My husband, Steve Waller, and I are both USAF physician veterans and colonels, now retired from active duty with 56 years of service between us. We were stationed in Washington DC, Maryland, Massachusetts, Texas, Mississippi, the Philippines, and Germany. We were aware of some of the environmental impact concerns and cleanup efforts at JBCC and Otis AFB in the late 1990's and early 2000's time frame just before we completed our USAF careers.

I am writing to express my strong opposition to further development on JBCC. Instead DoD funding should continue to support Cape Cod's efforts to clean up previous environmental degradation to our fragile aquifer.

A couple of my arguments beyond the environmental destruction would be to point out:

1. I am sure it would take many years, if not decades, for the travel and temporary duty pay for Massachusetts guard members to travel from their various home locations in Massachusetts to Vermont for machine gun training to add up to the nearly \$12 million dollars proposed expenditure for the Cape Cod training range. Cape Cod residents and Town Managers and Selectmen deserve a briefing with this funding issue clearly presented for the various training options.

The current largest annual nationwide National Guard live ammunition training event is in Michigan- with units travelling from over 20 states to participate - clearly the travel time and costs have not gotten in the way of this exercise!

[https://www.army.mil/article/236778/northern\\_strike\\_remains\\_guards\\_premier\\_joint\\_fires\\_exercise](https://www.army.mil/article/236778/northern_strike_remains_guards_premier_joint_fires_exercise)



3. “Asymmetric warfare” today rarely involves troops shooting at each other with machine guns-

a. The 911 Terrorist attacks involved hijacked civilian airliners used as missiles to destroy the Twin Towers, part of the Pentagon and a field in Pennsylvania

b. Many, if not most of our injured troops in Afghanistan and Iraq are badly injured or killed from improvised explosive devices which kill troops on foot or in vehicles-

c. Machine guns would not have been useful in these two settings.

Is the Army training for yesterday’s warfare?

Pentagon planners have consistently ranked Climate Change as one of the top threats to US national security since at least January 2017. Clear-cutting a significant number of acres on Joint Base Cape Cod will accelerate climate change and increase our national security threat from extreme weather events and sea-level rise.

- a. <https://climateandsecurity.org/2019/11/update-chronology-of-u-s-military-statements-and-actions-on-climate-change-and-security-jan-2017-november-2019/>
- b. <https://www.militarytimes.com/news/your-military/2019/01/18/dod-majority-of-mission-critical-bases-face-climate-change-threats/>

The Cape is essentially a “fragile sand bar” with a veneer of development eating away from the top as sea rise and increasingly violent storms linked to climate change eat away at the Cape around the edges. Our water supply is in a very precarious state now- even without further development.

I basically don’t agree with the Massachusetts Army Guard that the training requirement has been well thought through and certainly the environmental impact was a complete white wash. It seemed to me that the Guard justification for the machine gun range, was an attempt to justify maintaining the joint base on Cape Cod as a military location. “As Camp Edwards serves as the primary training site for Massachusetts, the proposed action is also needed to ensure the continued and long-term viability of Camp Edwards as a training center.” Associated Press coverage

My suggestion would be for DoD to deed back the majority of JBCC to an environmental trust who could work towards remediation of the environmental and water supply damage with continued DoD funding. A very small presence by the US Coast Guard should be enough military for the Cape.

I think that both the Falmouth and Sandwich Town Boards of Selectmen and town managers should be presented with detailed information sessions by the Mass Army Guard regarding this proposed Machine Gun training range. There should also be information sessions open to the public so that residents from locations impacted most by the activities on Joint Base Cape Cod are able to have all their concerns answered. A careful environmental impact assessment should be done involving many climate change and environmental experts familiar with the challenges on Cape Cod- such as the experts at Woodwell Climate Research Center.

I request an extension until at least 1 October, 2020, of the comment period for citizens and towns to respond to the very late publicity regarding the plans for this machine gun training range. I also request a thorough briefing by the Massachusetts Army National Guard planners regarding this proposal.

Thank you for your attention,

Jane Ward, MD, MPH, Colonel (retired) USAF

Centerville, MA

cc: Town of Falmouth Board of Selectmen

Town of Sandwich Board of Selectmen

Woodwell Climate Research Center

Commenter  
#219

**From:** [Westgates](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Cc:** [kandres@apcc.org](mailto:kandres@apcc.org)  
**Subject:** [Non-DoD Source] Opposing machine gun range  
**Date:** Thursday, September 3, 2020 8:24:03 PM

---

I am writing to oppose the machine gun range proposed for Camp Edwards on Cape Cod.

I cannot imagine what would justify the amount of acreage and the destruction of natural habitat proposed.

I support the Association for the Preservation of Cape Cod in its opposition.

Michael Westgate  
Chatham, MA

**From:** [Bev White](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] strongly opposed to machine gun range  
**Date:** Thursday, September 3, 2020 10:10:57 AM

---

Commenter  
#220

Mr. Driscoll,

I am strongly opposed to the proposed machine gun range. I think it would make a lot more sense to develop this large area as a wildlife sanctuary and/or park.

Without a comprehensive study, there is no way to know the environmental consequences. I suspect that the proposed gun range would have a very negative environmental impacts.

At the very least this area needs to have its environment protected. Also, a reassessment of the project should examine whether this project is an appropriate use for the Upper Cape Water Supply Reserve.

Thank you for your time and consideration.

Beverly White  
92 Gibson Road  
Orleans, MA 02653

**From:** [Elizabeth Aldred](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Camp Edwards machine gun range  
**Date:** Friday, September 4, 2020 12:02:07 PM

---

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

---

To: Keith J. Driscoll  
Date: September 4, 2020

Dear Mr. Driscoll,

I am writing to express my strong opposition to the proposal by the Massachusetts Army National Guard to clear 170 acres of forested land at Joint Base Cape Cod, in order to construct a multi-purpose machine gun range at Camp Edwards.

I have lived and worked on Cape Cod for more than 50 years and my children grew up and attended school here. I have watched with dismay the increasing threats to this vulnerable place posed by climate change. By sequestering carbon from the atmosphere, trees play an essential role in our efforts to mitigate the devastating effects of the warming process that drives the climate crisis which is affecting us all. We cannot afford to lose those 170 acres of forested land.

Our livelihoods, our homes and businesses, all are at risk. We cannot undo the damage that has already been done, but we CAN choose not to wreak further unnecessary destruction on our fragile ecosystem. Please respect this place we call home and those of us who earn our living here. Do NOT construct the machine gun range at Camp Edwards, Joint Base Cape Cod.

Sincerely,

Elizabeth Aldred

73 Eagle Pt. Cartway

POB 931

Brewster, MA 02631

elizabethaldred@c4.net < Caution-mailto:elizabethaldred@c4.net >

Commenter

#222

**From:** [Jana Bertkau](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Deforestation of Cape Cod  
**Date:** Friday, September 4, 2020 7:46:45 AM

---

Dear Mr. Driscoll,

I oppose this project which calls for 199 acres of land disturbance including the clear-cutting of 170+ acres of forested land to accommodate a gun range.

The Environmental Assessment's (EA) unsubstantiated findings of "No Adverse Environmental Impacts." is premature. It is essential that we are good stewards of our precious land and that we not contribute to climate change through this project.

Sincerely yours,  
Jana Bertkau

12 Coffins Field Road  
West Tisbury, MA  
508.687.9773 home  
203.246.3041 mobile

**From:** [Ann Canedy](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Cc:** [Leonard Pinaud](#); [Mimi McConnell](#)  
**Subject:** [Non-DoD Source] Machine Gun Range Joint Base Cape Cod E0EEA#5834  
**Date:** Friday, September 4, 2020 10:15:31 AM

---

Commenter  
#223

Mr. Driscoll:

Good morning. I am a member of the Community Advisory Council of the Environmental Management Commission for Joint Base Cape Cod. I am writing as an individual interested party however and my comments do not purport to represent the collective opinion of the Council.

I am writing to ask respectfully that you extend the comment period for the proposal to install a machine gun firing range on the Base. I realize that as a Council we have received some briefings about this over the past few years but as this has drawn to conclusion we have not, as a Council or as a community, fully focused on the details and ramifications of the proposal. I attribute this to the difficulties of effective communication under COVID constraints.

In addition to an extension of the public comment period, I would like to suggest a CAC meeting solely dedicated to this issue. It would of course be a public meeting but I leave it up to the CAC Chair Mimi McConnell and Leonard Pinaud as Managing Officer, if such a meeting is scheduled, to determine whether members of interested stakeholders should be invited to participate. I would advocate for their conclusion, either at the CAC presentation or at a separate CAC led meeting.

The bottom line is I think the public needs to feel like they are being included in the decision making as much as feasible and at a minimum, given a rationale for the proposed use.

Thank you for your consideration. I think the Military does an admirable job balancing the important need for military readiness with our sensitive environmental issues. Extending the courtesy of an additional 30 days comment period and a community outreach on this subject would I believe go along way furthering this goal.

Ann Canedy  
Box 23  
Cummaquid, MA 02637

**From:** [Roslyn Coleman](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Cc:** [Roz Coleman](#)  
**Subject:** [Non-DoD Source] Opposition to Gun Range  
**Date:** Friday, September 4, 2020 7:44:07 AM  
**Importance:** High

---

Commenter  
#224

Cape Cod needs its trees and taking 200 acres of trees and wildlife off line for a machine gun range is a desecration of the limited land of Cape Cod.

"...the Environmental Assessment and resulting Finding of No Significant Impact are fatally deficient. The proposed MPMG project will have significant climate change impacts, which while ignored in the (reports), must be identified, quantified and thoroughly analyzed with input from the affected public as required by the National Environmental Act (NEPA). Specifically, the EA: (1) fails to account for or quantify the obvious and foreseeable impacts stemming from the loss of carbon sequestration capacity in clear-cut forest areas; (2) lacks a cumulative impacts analysis; (3) avoids the robust alternatives analysis and mitigation assessment that would be required under an EIS; and (4) fails to involve the affected public in the process, ignoring the past environmental history of pollution at Camp Edwards where remediation is still ongoing."

Bill and Roslyn Coleman  
600 Orleans Road  
North Chatham, MA 02650



**From:** [Jeanne Cosgrove](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] No to deforestation project & gun range  
**Date:** Friday, September 4, 2020 7:09:42 AM

---

Commenter  
#225

I am writing to express opposition to the deforestation and gun range project at the base. Given the past history of polluting Cape Cod's sole source aquifer, this project clearly should not happen.

This project would negatively impact Cape Cod environment, drinking water, and climate.

Sincerely,

Jeanne Cosgrove  
Sent from Jeanne's iPhone



Commenter  
#226

VIA EMAIL: [Keith.J.Driscoll.nfg@mail.mil](mailto:Keith.J.Driscoll.nfg@mail.mil).

September 4, 2020

Keith Driscoll  
Massachusetts Army National Guard  
2 Randolph Road  
Hanscom Air Force Base, MA 01731

RE: Massachusetts Army National Guard – Camp Edwards Multi-Purpose Machine Gun Range  
Environmental Assessment and Finding of No Significant Impact

Dear Mr. Driscoll:

The Cape Cod Climate Change Collaborative (Climate Collaborative) submits this letter in response to the request from the Massachusetts Army National Guard (MAARNG) for comment on its Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the proposed Multi-Purpose Machine Gun Range (MPMG) at Camp Edwards, Barnstable County, Massachusetts.

The Climate Collaborative represents businesses, institutions, organizations and citizens of Cape Cod and the Islands of Nantucket and Martha's Vineyard, Massachusetts (Cape & Islands). Its mission is to unite the knowledge, resources, talent and tools of its hundreds of members to mitigate climate change impacts, reduce greenhouse gas emissions, protect natural processes of carbon sequestration and work toward achieving net zero-based goals for the Cape & Islands. The broad-based membership of the Climate Collaborative Board includes leaders in finance and banking, housing, construction, environment and education, municipal and county government, and faith, youth, and civic climate activism. All are committed to mitigating the climate crisis, which on the Cape & Islands, has become an existential threat.

The Climate Collaborative believes that, for the reasons described below, the EA and resulting FONSI are fatally deficient. The proposed MPMG project will have significant climate change impacts, which while ignored in the EA and FONSI, must be identified, quantified and thoroughly analyzed with input from the affected public as required by the National Environmental Act (NEPA). Specifically, the EA: (1) fails to account for or quantify the obvious and foreseeable impacts stemming from the loss of carbon sequestration capacity in clear cut forest areas; (2) lacks a cumulative impacts analysis; (3) avoids the robust alternatives analysis and mitigation assessment that would be required under an EIS; and (4) fails to involve the affected public in the process, ignoring the past environmental history of pollution at Camp Edwards where remediation is still ongoing.

The FONSI's unjustifiable conclusion that there is no significant impact from the proposed MPMG project lacks any support in the EA. For these reasons, the Climate Collaborative believes the EA and FONSI should be withdrawn and a new EA prepared in compliance with NEPA requirements, resulting in a recommendation that a full Environmental Impact Statement (EIS) be prepared.

NEPA's decision-making requirements are clear. Under NEPA, an EA must consider direct, indirect and cumulative environmental impacts of a proposed action in order to determine whether the comprehensive environmental assessment contained in an EIS is required. NEPA's procedural requirements are designed to ensure that a decision-making process provides a thorough analysis and public involvement. In this case, the EA and the FONSI do neither. MAARNG was charged with deciding whether any environmental impact associated with the MPMG is "significant." To determine the significance of potential impacts, the EA contains only the most cursory discussion of the project's possible environmental impact. To determine the climate change associated with the MPMG project, the EA looked only at emissions associated with vehicle travel to and from the Camp Edwards site, finding that the project could have a beneficial impact on climate by eliminating those emissions.

The Climate Collaborative's review of the EA is particularly focused on the MPMG's calls for clear-cutting 170 acres of forest. The Climate Collaborative is categorically opposed to forest destruction for any reason and has issued a formal position statement opposing tree cutting, even to accommodate solar arrays. This position is based on studies examining forests' ability to provide significant storage and sequestration of the carbon pollutants that drive climate change. Research on carbon sequestration indicates that mature forests, such as those on Camp Edwards, can potentially sequester between 1 and 1.6 metric tons per acre per year. It is clear that MAARNG failed to conduct any research to determine and quantify the sequestration losses, and attendant carbon releases, associated with clear-cutting 170 acres of forest lands. These impacts must be analyzed and quantified.

The MAARNG purports to go through the motions of considering climate change in its assessment, but the outcome fails to reflect NEPA's purposes. As a result, the Cape & Islands region is left with less carbon storage capacity and more GHG emissions. This significant loss is not quantified or even addressed anywhere in the EA or the FONSI.

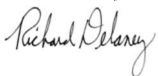
We close our comments with the recommendation by the United States Army War College in [Implications of Climate Change for the US Army](#), published in 2019:

*1.1 Problem: The Lack of a Culture of Environmental Stewardship*

***Recommendation:*** *Army leadership must create a culture of environmental consciousness, stay ahead of societal demands for environmental stewardship and serve as a leader for the nation or it risks endangering the broad support it now enjoys. Cultural change is a senior leader responsibility. **Implementation Timing:** Now*

The time to create a "culture of environmental consciousness" is now. That begins with rejection of the fatally flawed EA and FONSI and undertaking of a full EIS including an examination of alternatives, mitigation measures, a thorough vetting of environmental and climate concerns, and a deep dive into the science regarding the climate impact(s) of de-forestation. Such a process must also include a robust schedule of public hearings.

Sincerely,



Richard F. Delaney, President  
The Cape Cod Climate Change Collaborative

**From:** [David Duncan Dow](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Cc:** [David Duncan Dow](#)  
**Subject:** [Non-DoD Source] Comments on Multi-purpose Machine Gun Range at Camp Edwards on Joint Base Cape Cod  
**Date:** Friday, September 4, 2020 2:17:01 PM

---

I am commenting as a grassroots environmental activist and retired marine scientist living on Cape Cod. I have been engaged in the SDWA/CERCLA cleanup on Joint Base Cape Cod, since the late 1970's (the Ashumet Valley Plume lies underneath the Yearling Meadows development where I live in East Falmouth). In addition, I represented the Sierra Club on the Community Working Group which helped frame the compromise of military training that is consistent with the conservation of State-listed species and the protection of groundwater from toxic chemicals from military training. I have learned that the military likes to train like it fights, since Army National Guard troops get deployed throughout the world to defend US treaty obligations and business interests. These are my personal comments and don't represent the view of the Massachusetts Chapter/Cape Cod Group- Sierra Club Executive Committees.

Recently I have been focused on commenting on 1, 4- dioxane in the CS-10 plume, but was concerned by reporting on the Multi-purpose Machine Gun Range in the Cape Cod Times by Christine Legere & WCAI's story by Eve Zuckoff. My scientific colleague, Dr. Chris Neill (Woods Hole Research Center), expressed concerns about this endeavor & I respect his views as a terrestrial climate change scientist and habitat expert. My climate change activism is focused on the mortalities of North Atlantic right whales from entanglements in American lobster gear. My sense is that the important habitats for state-listed species on Camp Edwards is Savannah and grasslands and not scrub oak/pitch pine forests, but will leave it up to the Massa. Division of Fisheries & Wildlife to comment on this issue. My concerns focus on the 5000 acres of land which will be effected by the 170 acre machine gun range which is a significant portion of the land at Camp Edwards. This is bound to have negative consequences on wild things, wild places at JBCC.

I feel that the Army National Guard should conduct a cumulative impact assessment (CIA) and utilize an adaptive, ecosystems-based management approach that allows responses to unexpected changes from climate disruption & increased noise/ human activities within a large area at JBCC. There should be some type of public hearing to review the CIA and discuss management alternatives. As the COVID-19 Pandemic health and socioeconomic effects have shown, we live in a complex world which is not at equilibrium/ exhibits non-linear interactions that effect both human activities and the natural environment. In my experience neither the Ma. EOEEA MEPA process nor Cape Cod Commission Assessments include this new reality and assume the continuation of a steady state natural/human system which is at equilibrium (the marine equivalent of this is the Northeast Continental Shelf Ecosystem conceptual model which ignores climate change; increased ocean noise; effects of other human activities on the "productive capacity of Essential Fish Habitat; 2020 Ecosystem Status report for the Mid-Atlantic/New England regions shows that "natural mortality" increases as fish/shellfish species and their prey change in space/time; etc.).

Many years ago, I pointed out to AFCEC (Air Force Civil Engineering Center) that the "natural attenuation" of toxic contaminants of concern in the soil at JBCC would be effected by climate change. After the glaciers our earthworms came from Europe which has a much more temperate climate than what currently occurs here on Cape Cod. The biogeochemical cycles are based upon interactions between soil microbes/microfauna/earthworms, so that if

one converts forests to grassland or Savannah habitats changes are bound to occur which could lead to unexpected consequences in a dynamic complex natural world. For many years I have warned about PFAS and contaminants of concern pollution of Ashumet pond, but it was only recently that PFAS was discovered in the water column and sediments. This newly discovered PFAS source (in addition to the Fire Training Area/old Wastewater Treatment Plan) has caused the down gradient Ashumet Valley Plume to become a big blob which has contaminated public and private drinking water wells in Falmouth and Mashpee with PFOS and PFOA.

This is one reason why we need a cumulative impact assessment for the Multi-purpose Machine Gun Range at Camp Edwards to avoid surprises (like the PFAS contamination of Ashumet pond). If such surprises are detected an A, EBM approach would allow an appropriate response to negative effects on wild places, wild things in the surrounding environment. As a marine scientist I am especially concerned about noise effects on wildlife and losing greenhouse gas storage in trees/roots as the Cape Cod Commission moves to develop a Climate Action Plan by January 21, 2021. Changes in the soil biogeochemistry could effect plants and natural cycles of toxic substances in the soil. More attention needs to be given to the biological aspects of this cycling/natural attenuation process (perhaps the US Geological Survey could provide more insights on this process).

Thanks for your consideration of my comments.

Dr. David D. Dow  
East Falmouth, Ma.

**From:** [Dunham, George](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Cc:** [Rendon, Paul E NFG NG MAARNG \(USA\)](#)  
**Subject:** [Non-DoD Source] RE: {EXTERNAL} RE: Hi & Range Location Question  
**Date:** Friday, September 4, 2020 11:17:38 AM

---

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

---

Thank you, Keith!

At the Sandwich Board of Selectmen meeting last night, the Board really had three areas of concern they wanted me to look into:

1. Confirming how many acres were going to be cleared as part of the range construction and operation;
2. If there was noise attenuation or barriers put in place to minimize the sound impact on surrounding neighborhoods; and
3. Clarifying what time of day or parts of the week the range would be used.

I will await Col. Porter's outreach, but if it could be recorded what the Sandwich Board of Selectmen concerns are as part of the official record for the project, that would be appreciated.

Thank you again for getting back to me. Have a great holiday weekend.

- Bud

---

**From:** Driscoll, Keith J NFG NG MAANG (USA) [Caution-mailto:keith.j.driscoll.nfg@mail.mil]  
**Sent:** Friday, September 4, 2020 10:13 AM  
**To:** Dunham, George  
**Cc:** Rendon, Paul E NFG NG MAARNG (USA)  
**Subject:** {EXTERNAL} RE: Hi & Range Location Question

Hello Mr. Dunham-

Thank you for reaching out with your questions. If the Camp Edwards Base Commander Colonel Porter hasn't contacted you as of yet he will shortly with an informational project fact sheet that will provide your with the answers to your questions and further information on the project.

I have recorded your questions and comments for the projects administrative record.

Thank you.



COMMONWEALTH OF MASSACHUSETTS  
**THE GENERAL COURT**  
STATE HOUSE, BOSTON 02133-1053

**Commenter**  
**#229**

September 4, 2020

Mr. Keith J. Driscoll  
Massachusetts Army National Guard  
Hanscom Air Force Base, MA 01731

Dear Mr. Driscoll,

We are writing to you today regarding the recently announced plans to construct a machine gun firing range on Joint Base Cape Cod. As the elected State Senators for the affected communities we would like to share our concerns and those of our constituents that the public review process for this decision is being rushed. We respectfully request that you reconsider the decision to close the comment period on September 8 and provide a 30-day extension to allow for more discussion and review of this important decision.

As you know, Joint Base Cape Cod includes the largest piece of undeveloped land on Cape Cod which is home to 37 protected species. The base also sits atop an underground aquifer that supplies the drinking water for the Upper Cape communities we represent. Since the National Guard took up residence in 1911, it has been a steward of this land and a valued community partner. The communities of the Upper Cape have worked with the National Guard on numerous occasions, most recently regarding the water processing plant currently operated on the base. I have no doubt that you recognize the value of this partnership in the same way our communities have valued the ability to work with you over the years.

We understand and respect that as the steward of 22,000 acres of land on Cape Cod you appreciate the tenuous environmental balance our communities must navigate. While deforesting 170 acres may not seem impactful in the grand scheme of the base, it may have an outside impact on our communities by changing the quality of our groundwater, drinking water, and air.

In light of these hazards, we respectfully request an extension of the comment period on these plans. Given the ecologically diverse and fragile land you plan to develop, we and our constituents believe this plan needs more time and analysis. Thank you for your consideration of this request. Please feel free to contact our offices should you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Susan Moran".

**Senator Susan Moran**  
*Plymouth and Barnstable*

A handwritten signature in black ink that reads "Julian Cyr".

**Senator Julian Cyr**  
*Cape and Islands*

Commenter

#230

**From:** [Brooke Eaton-Skea](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Gun range  
**Date:** Friday, September 4, 2020 11:58:30 AM

---

Dear Mr Driscoll - I've just learned of the proposal to clear cut a large forest to make room for a gun range on the upper Cape. I have lived in Brewster for 16 years and am very concerned about the impact this clear cutting would have on our environment. I am adamantly opposed to this idea.

Thank you.

Sincerely,  
Brooke Eaton-Skea  
115 Bog Pond Road  
Brewster MA 02631

Sent from my iPhone



**From:** [FRED GAECHTER](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Deforestation  
**Date:** Friday, September 4, 2020 12:43:51 PM

---

Mr. Driscoll,

I write in vehement opposition to the deforestation program proposed on JBCC for a gun range and peripheral functionality.

I am the President of the Truro Conservation Trust and a member of the Town of Truro's Climate Change Action Committee.

Both these organizations have programs to plant trees throughout our town for water conservation and purification, for environmental protection from erosion and development, and for carbon sequestration. Similar organizations, in other Cape towns have comparable programs.

What all these organization would accomplish would be more than negated by the one gun range program as proposed, thereby, defeating Cape Cod's volunteer efforts to protect the Cape's environment, improve air quality, and respond to climate change impacts on our rural communities and way of life.

It's just unimaginable that JBCC could be so insensitive to your neighbors on this very special peninsula. And for what, an MPMG. My God, what an insult to all of us who live and make a living here.

We request, for the good of the citizens of Cape Cod and Massachusetts that this unnecessary and harmful project be cancelled.

Respectfully,

Alfred Gaechter (a Vietnam Era Air Force Veteran)

PO Box 729

North Truro, MA 02652

Commenter

#232

**From:** [grandzy@aol.com](mailto:grandzy@aol.com)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Deforestation  
**Date:** Friday, September 4, 2020 10:57:56 AM

---

The beauty of Cape Cod will be hampered greatly by the deforestation that is supposed to take place at camp Edwards. Who is responsible for this action? Is this really necessary? There are very few pristine places left on the Cape and this would be a shame If it were to go forward. Please do the right thing and we consider this action.

For your immediate attention to this matter,  
Maureen Grandmont  
116 Kilkore Dr.  
Hyannis

Sent from my iPhone

**From:** [Dawna Hammers](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Totally Oppose Expanded Machine Gun Range  
**Date:** Friday, September 4, 2020 4:54:10 PM

---

Commenter  
#233

Dear Mr. Driscoll,

I am writing to tell you that I am VERY CONCERNED about the proposed machine gun range at Joint Base Cape Cod!

We don't need more machines of death! We need trees of life! Our humanity, democracy and planet are at a crucial time of change & survival.

It is unconscionable of the National Guard to cut down 170.5 acres of precious & environmentally crucial trees for this selfish, dangerous & deadly reason at this crucial time.

This smells of Trumps White Supremacy's ruthless killing of unarmed, peaceful protestors in the name of justice for the Black Lives Matter Movement. It's appalling!

Who on God's good earth want to kill or be killed by a machine gun? Why do men not care about their fellow human beings and animals habitat?

This shooting range will only devastate our natural wildlife, water, air, quiet & peace of mind but it will also unleash a militia of killers upon our soil.

Please for the love of God, the people, animals, trees and peace upon the Earth  
STOP THIS PROJECT FROM HAPPENING.

Your family and grandchildren will be proud of you in the end for having a heart and taking a moral stand against death & destruction.

Regretfully, Dawna Hammers

Commenter

#234

**From:** [PHYLLIS HELFRICH](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Proposed shooting range on Cape Cod  
**Date:** Friday, September 4, 2020 12:02:08 PM

---

Dear M. Driscoll,

I am writing to voice my strong opposition to the proposal for building a machine gun shooting range on Cape Cod, so close to my home. You cannot cut down almost 200 acres and say you are not having an impact on the environment. I live in Forestdale and will be impacted by the noise. I don't want the children of Forestdale School to be subjected to that noise either. Children have enough problems concentrating without that added. Also, Cape Cod is a tourist destination. This noise will be heard at Snake Pond, a favorite beach for residents and visitors.

LISTEN TO THE PEOPLE!!!.

Phyllis Helfrich

7 Jeannes Way

Forestdale, MA 02644



Commenter  
#235

September 4, 2020

Keith J. Driscoll  
MAARNG 2  
Randolph Road  
Hanscom Air Force Base, MA 01731

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

Dear Mr. Driscoll:

The Southeastern Massachusetts Pine Barrens Alliance (SEMPBA) is a nonprofit organization whose mission is to raise awareness about the need for urgent action to conserve, protect and restore the globally rare Massachusetts Coastal Pine Barrens ecoregion, and to facilitate cooperative action among federal, state, municipal and tribal agencies, conservation organizations and landowners in furtherance of that mission.

SEMPBA has reviewed the Environmental Assessment for a proposed Multi-Purpose Machine Gun (MPMG) Range at Joint Base Cape Cod and has concluded the project should not go forward.

On a very basic level, Cape Cod and the adjacent communities of Southeastern Massachusetts encompass a particularly rare and fragile ecosystem which is ill-suited to projects of this kind.

We also concur with a review of the proposal by the Association to Preserve Cape Cod (APCC) which publicly questions the “the thoroughness of the projects’ EA (environmental assessment) along with its findings of ‘no significant impact.’”

Additionally, SEMPBA is concerned that the MPMG proposal is a large step in the wrong direction, in terms of the status of Joint Base Cape Cod and, in general, development of Camp Edwards located within one of the few remaining large tracts of Coastal Pine Barrens.

Since the conclusion of World War II, the military infrastructure within the base has gradually diminished—and major cooperative efforts have taken place to address the pollution of groundwater resulting from irresponsible practices of the military managers of the site in the past—to the point that today the perceived value of the majority of the grounds *within the fences* has been understood to be its significant forests, habitat and aquifer recharge capabilities—all of which had, to date, been capably managed by the Natural Resources and Integrated Training Area Management program manager for the Massachusetts Army National Guard.

The 5000+ acres that are part of the MPMG proposal would represent a major loss for the region’s environment: it is nearly a quarter of the base’s total acreage and includes hundreds of acres where the forest would be clear-cut for a firing range and the remainder off-limits to guard against accidentally exposure to live fire and unexploded munitions.

Though this area includes the second largest remaining expanse of coastal pine barrens left in the world, the reality is that only 10 percent of the natural communities that once comprised this ecoregion remain.

Every acre of remaining Pine Barrens is therefore critical to the regions’ continued environmental vitality, as those intact natural communities protect our air, our aquifers, and the more than 200 state listed (rare or endangered) species of plant and animal found herein: in short, the Pine Barrens protects our quality of life.

Southeastern Massachusetts Pine Barrens Alliance, Inc. • 158 Center Hill Road at the Center Hill Preserve  
Plymouth, MA 02360 • 774-773-9982 • [sempba@pinebarrensalliance.org](mailto:sempba@pinebarrensalliance.org) • [www.pinebarrensalliance.org](http://www.pinebarrensalliance.org)

Shaul Heller