

**From:** [Karen Pierson](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Opposing machine gun range and wanton destruction of CO2 retaining trees  
**Date:** Sunday, September 6, 2020 4:04:14 PM

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Dear Mr. Driscoll,

By any standards, Cape Cod is a fragile landscape. Economically, environmentally, and socially as you look at our population strata.

Not quite a year ago, the Boston Globe premiered a series on climate change showing Cape Cod at the edge of a rising ocean, which won a Pulitzer Prize for accuracy and importance of reporting. Those of us who live here have watched water slosh down Commercial Street in Provincetown, seen it scour the Sandwich town beach and toss houses into the water. We watched a car swallowed by a Sand dune outside Wellfleet's Beachcomber, while chunks of coastal bank drop off the edge not only of the powerful Atlantic, but of the calmer Cape Cod Bay.

We are more and more confident that it's not just a big decision, but a confluence of many small decisions that took us down this dangerous path as a nation and a world. The 15 towns on the Cape already set up a Resilience network of fighters who don't use guns but funds, harnessing sheer brain power and creativity to combat the relentless water.

So irregardless of the monstrous thought of a military machine gun training center in a nation that kills more innocents by weapons, who thought that clear-cutting 170.5 acres could possibly be a good idea on a fragile peninsula already buffeted by Mother Nature's wrath? How could there be a finding of no environmental impact?

Read the Globe article cited here and the things they learned. Read the Cape Cod Commission news, look at the Cape Cod Climate Change Collaborative.

Caution-<https://www.bostonglobe.com/metro/2019/09/26/things-learned-researching-climate-change-cape-cod/ydI10vGJ7ummlw1JQLxSAL/story.html?event=event12> < Caution-<https://www.bostonglobe.com/metro/2019/09/26/things-learned-researching-climate-change-cape-cod/ydI10vGJ7ummlw1JQLxSAL/story.html?event=event12> >

According to the US Department of Agriculture in a 2019 report calling trees "superheroes" ...

Here is the super hero part. Through a process called photosynthesis, leaves pull in carbon dioxide and water and use the energy of the sun to convert this into chemical compounds such as sugars that feed the tree. But as a by-product of that chemical reaction oxygen is produced and

released by the tree. It is proposed that one large tree can provide a day's supply of oxygen for up to four people.

Trees also store carbon dioxide in their fibers helping to clean the air and reduce the negative effects that this CO2 could have had on our environment. According to the Arbor Day Foundation < Caution-  
<http://www.arborday.org/trees/treefacts/> > , in one year a mature tree will absorb more than 48 pounds of carbon dioxide from the atmosphere and release oxygen in exchange.

Shame on you all for thinking clear cutting this land was a good idea on our fragile peninsula, with no environmental impact.

Sincerely,  
Karen Pierson  
P.O. Box 1337  
19 Driftwood Lane  
Orleans, MA 02653  
[Karenmpierson@sbcglobal.net](mailto:Karenmpierson@sbcglobal.net)

**From:** [Pam Polloni](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Camp Edwards Multi-Purpose Machine Gun Range Environmental Assessment  
**Date:** Sunday, September 6, 2020 7:23:10 PM  
**Attachments:** [Letter Re Camp Edwards Multi-Purpose Machine Gun Range EA.pdf](#)

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September 6, 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,

As a Cape Cod resident and once a member of the Community Working Group helping to preserve an important part of Cape Cod's natural resources, I agree with others that Camp Edwards and the Upper Cape Water Supply Reserve habitat could be significantly impacted by the clear-cutting of 170 acres of woodland including pitch pine-scrub oak barrens (not to mention impact on the 5000 acres where projectiles could land) and habitat for the rare species occurring there. What we all know now is that with our climate increasingly warming, a project like this limits carbon sequestration and will be a detriment.

Whether the proposed Machine Gun Range is a "compatible use" of the Upper Cape Water Supply Reserve remains to be carefully considered. In my opinion, there is no reason to add to the already well defined, limited, and accepted training facility on Camp Edwards, which is the Upper Cape Water Supply Reserve.

Sincerely,

Pamela Polloni  
48 Wild Harbor Road  
North Falmouth, MA 02556

Commenter

#289

**From:** [David Prosten](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Cc:** [Sarah Flynn](#)  
**Subject:** [Non-DoD Source] Proposed JBCC machine gun range  
**Date:** Sunday, September 6, 2020 10:23:32 PM

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Mr. Driscoll:

My wife and I have homes in Falmouth and Mashpee, the latter being a seasonal cottage. We oppose the creation of a machine gun training center at JBCC. The designated 170 acres are overwhelmingly forested; leveling a forest to create what apparently would be a little-used \$11 million facility is environmentally unsound and financially irresponsible. The army has used nearby states' ranges for years and we urge that arrangement continue.

David Prosten and Sarah Flynn  
64 Landfall  
Falmouth MA 02540

49 Duckblind Rd. Mashpee

Sent from my iPad



**From:** [Paula Schnepf](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Comment Regarding Proposed Machine Gun Range at JBCC  
**Date:** Sunday, September 6, 2020 12:22:37 PM

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Dear Mr. Driscoll:

I agree strongly that the Environment Assessment presented for a 30 day Public Comment period is insufficient to support the findings of "no significant impact" to the Upper Cape Water Supply Reserve. An in-depth, comprehensive study of the major issue areas associated with the project needs to be conducted through the preparation of the an Environmental Impact Statement, which must include a 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 barre natural communities and groundwater resources.

As stated in the response from the Association to Preserve Cape Cod (APCC), "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."

As a 26 year resident of Marstons Mills (western edge of Barnstable), I have always been concerned about the environmental impact of past, current and future activities on JBCC (or the former Massachusetts Military Reservation). Given that there is a current alternative for machine gun training for Guard members in Vermont, I can't fathom the reason to destroy forested acres on Cape Cod, risk degradation of our water supply, and increase noise pollution in residential neighborhoods surrounding the base. The availability of funding or a perceived need to keep JBCC relevant should not be the main driver for creating this machine gun range.

I highly recommend that in addition to conducting a full EIS, that the public comment period for this Environmental Assessment be kept open at least another 30 days.

Sincerely,  
Paula Schnepf

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

Commenter  
#291

**From:** [Anne Smaglia](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Machine Gun Range  
**Date:** Sunday, September 6, 2020 10:35:44 AM

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Mr. Driscoll,

I am a resident of Brewster, MA, on Cape Cod, and want to submit my opposition to the development of a Machine Gun Range at Camp Edwards. Mr. Driscoll, Cape Cod is a unique and wonderful natural haven that deserves to have all elements of its environment protected.

The noise to the surrounding community as well as the clear cutting of 170 acres should be discussed at a public hearing. A project that will impact 5000 acres needs careful review by the surrounding community. We need public hearings to fully understand a project of this magnitude.

Thank you for your time and consideration.

Anne Smaglia,  
Brewster, MA

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please note new email address [smagliaa@gmail.com](mailto:smagliaa@gmail.com) < Caution-mailto:smagliaa@gmail.com >  
yes 2 a's at end of Smaglia

Commenter

#292

**From:** [Robert Smaglia](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Machine Gun Range  
**Date:** Sunday, September 6, 2020 10:25:30 AM

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Mr. Driscoll,

I am a resident of Brewster, MA, on Cape Cod, and want to submit my opposition to the development of a Machine Gun Range at Camp Edwards. Mr. Driscoll, Cape Cod is a unique and wonderful natural haven that deserves to have all elements of its environment protected.

The noise to the surrounding community as well as the clear cutting of 170 acres should be discussed at a public hearing. A project that will impact 5000 acres needs careful review by the surrounding community. We need public hearings to fully understand a project of this magnitude.

Thank you for your time and consideration.

Bob Smaglia,  
Brewster, MA

**From:** [M. Suchenicz](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] A full EIS is needed!  
**Date:** Sunday, September 6, 2020 11:09:51 AM  
**Attachments:** [MPMG-EA-Comment-Letter-FINAL.pdf](#)

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Mr. Driscoll,

I am sending this message in opposition to the plan to destroy 170 acres of forest here on Cape Cod. I agree wholeheartedly with the attached letter.

A much more thorough, scientific environmental review is needed!

*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*

Thank you,  
 Myra Suchenicz



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Commenter

#294

**From:** [Margaret Sulanowska](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Machine gun range  
**Date:** Sunday, September 6, 2020 2:42:52 PM

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Dear Sir:

I am concerned about the proposal to clear land on the base for a machine gun range. This area is a large unfragmented habitat providing home for many animals; some are rare. The forest also stores greenhouse gases, providing a buffer for climate change. Cutting all the trees would mean losing a natural sink. This could also have an impact on our groundwater aquifer.

Please refrain from establishing this machine gun range on Cape Cod and use other sites in the NorthEast for such training.

Margaret Sulanowski  
53 Queen St.  
Falmouth, MA 02540

Commenter

#295

**From:** [Karen Watson-Etsell](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Against Machine Gun Range  
**Date:** Sunday, September 6, 2020 2:52:52 PM

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Dear Mr. Driscoll,

Please, please do not allow the proposed machine gun range to go any further. Stop it NOW.

Many individuals and organizations have weighed in describing all the reasons this is not a good idea for Cape Cod, APCC among them -- noise pollution, water pollution, air pollution, ground pollution, increased military transport vehicles creating increased traffic on our already busy bridges. If Joint Base Cape Cod has acreage that it does not need, rather than creating a machine gun range, consider returning it to local municipalities to create more housing. Or how about creating a Camp Edwards Institute to teach de-escalation strategies and techniques, rather than better killing rates through improved marksmanship?

I am 76 years old and have lived in Orleans and Brewster for 50 years. During that time in our nation, gun violence has become a major public health issue. We don't need to train military machine gun users on this fragile penninsula we call home. Cape Cod is a special place where people come to find a sense of peace and tranquility in nature. Please do not destroy any more of the trees which help to clean our air and shelter animals and humans alike.

Karen Watson-Etsell  
[kwatsonetsell@gmail.com](mailto:kwatsonetsell@gmail.com) < Caution-mailto:kwatsonetsell@gmail.com >

I hope to read soon that this idea has been shelved permanently.

**From:** [Felicity Young](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Forestdale, MA- Machine Gun Range  
**Date:** Sunday, September 6, 2020 9:32:04 PM

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Commenter  
#296

Hello,

I'm writing to express my concern with the proposed machine gun range in Forestdale, MA. My family lives here- I have two small children. My children will eventually attend Forestdale School. The articles/reports available to the public have had very little and vague information about the impact to our community. Words like "varied" and "minimal" are terribly concerning for residents because they are deliberately evasive. Residents deserve a public hearing. We live here year around. Our children are growing up here. We deserve the right to have the facts and full picture before such changes are forced upon our community.

Thank you,

Felicity Young

Commenter

#297

**From:** [Judith Beams](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Opposition to Machine Gun Range on Cape Cod  
**Date:** Monday, September 7, 2020 11:11:19 AM

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Dear Mr. Driscoll,

I am a resident of Orleans MA, on Cape Cod, and want to submit my opposition to the development of a Machine Gun Range at Camp Edwards. Mr. Driscoll, Cape Cod is a unique and wonderful natural haven that deserves to have all elements of its environment protected.

Without a comprehensive study of the major issue areas associated with the project, there is no way to know the total environmental consequences. Specifically we need to understand 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.

Additionally, 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,

Judith Beams  
89 Fox meadow drive  
Brewster, MA



**From:** [Alan Burt](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] re: camp Edwards multi-purpose machine gun range proposal  
**Date:** Monday, September 7, 2020 3:29:45 PM

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September 7, 2020

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

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

My name is Alan Burt. I am a licensed social worker LICSW and have been a homeless advocate on Cape Cod since 1993. I have worked with several thousand homeless men and women over the years and can tell you that the number one cause of homelessness is a lack of affordable housing. I have held a homeless memorial service on Dec 21st for the past 20 years to pray for the hundreds who have died in the state of homelessness on the streets of Cape Cod.

Whereas you have land available, I would ask, I would plead, that you not use it for killing practice and instead use it to prevent further needless deaths on Cape Cod by allowing the land to be used for affordable housing projects. Over the years, statistics indicate that nearly a third of the homeless are veterans. I would suggest that one good use of the land be used for affordable housing projects for veterans with particular emphasis on housing those most in need first and then go from there. I would recommend your contacting Housing Assistance Corporation and Falmouth Housing Corporation for proposals. I would like to think that they would be very interested in providing project proposals. Another importance resource to talk to about providing affordable housing projects would be contacting Beth Alpert at Barnstable County Department of Human Services.

Sincerely,

Alan R. Burt LICSW  
508-648-2246

Commenter

#299

**From:** [Larry Cole](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] Proposed Machine Gun Firing Range at JBCC  
**Date:** Monday, September 7, 2020 8:05:05 PM

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Mr. Driscoll,

I support the granting of an extension for public consideration of the proposed machine gun range. However, I'm inclined to support the National Guard's plan, assuming it would be implemented as carefully as the plans for opening the other ranges have been, which I observed first hand during about 15 years of membership on the Community Advisory Council.

As it happens, I was assigned to a machine gun squad in an infantry rifle platoon in Korea during the war. Thorough, rigorous training is absolutely essential to its effective deployment.

Larry Cole  
MSG USAR (Ret)  
S. Weymouth, MA

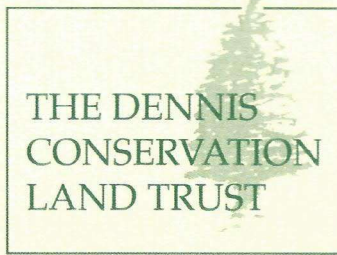
**From:** [Pat Cronin](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] JOINT BASE CAPE COD  
**Date:** Monday, September 7, 2020 11:08:53 AM

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Commenter  
#300

Please honor this request to extend the public comment period re the National Guard's plan to create a machine gun range at Joint Base Cape Cod's Camp Edwards for an additional 30 days. The public deserves this time to review the request for this facility. It came out of the blue at the busiest time of the year here on the Cape, hence this request.

Pat Cronin



Commenter  
#301

A private non-profit land trust founded in 1988

September 7, 2020

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

RE: Camp Edwards Proposed Multi-Purpose Machine Gun Range

Dear Mr. Driscoll,

The Dennis Conservation Land Trust (DCLT) strongly opposes the proposed Multi-Purpose Gun Range plan at Camp Edwards in Bourne, MA that would result in the clear-cutting of 170+ acres of forested land.

I am writing on behalf of the DCLT, whose mission is to protect land and other natural and cultural resources in the town of Dennis, 29 miles to the east of Camp Edwards on Cape Cod. We support and encourage sustainable development when it does not negatively impact the sensitive coastal, marine and inland ecology of the region. We are very concerned about the clear-cutting of 170+ acres of forested land to accommodate the gun range, "surface danger zones" where fired projectiles would land, and ancillary site elements such as roadways.

Residents of Cape Cod appreciate the value of the training that has occurred on the base since 1911 - preparing soldiers for combat, training nurses for field stations, housing POWs, and scrambling jets on September 11, 2001 among other things. As Americans, we believe in the best training for our military. We rely on the military to protect our communities, but we also believe it is the military's responsibility to cause no harm to our quality of life unless absolutely necessary to their mission. Quality of life includes access to clean drinking water, a healthy ecosystem, and the absence of noise or chemical pollution.

In the past, the military has needed the local community to sound the alarm about environmental issues. In the 1950's, Dr. Alfred C. Redfield and other scientists from the Woods Hole Oceanographic Institution alerted the military to the dangers of storing radioactive on the top of our groundwater supply. Fortunately, the military listened. In 1989, after reports of drinking water contamination in local communities, Joint Base Cape Cod was designated a "Superfund Site." Years of fire training, improper landfill disposal, petroleum fuel storage and disposal, and other toxic chemical spills had created plumes of contaminated groundwater. Again the military

Post Office Box 67 · East Dennis, Massachusetts 02641

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Mr. Keith Driscoll  
September 7, 2020  
Page Two

responded and began a clean-up program. The most recent five year review of the clean-up notes that the contamination has decreased but still exists, with exposure to groundwater from the original seven plumes in some areas resulting in increased risk rates for cancer (p. 141). Section 3.9 refers to the need for more sustainable engineering practices in a world concerned with climate change (p. 52) including concern for "impacts on land and ecosystems."

The DCLT, its Board of 17 and over 600 members, strongly urge the Massachusetts National Guard to revisit, reconsider, and revoke the recent proposal to clear-cut 170+ acres of forestland on the base for a multi-purpose machine gun range. We depend on the National Guard to make the right decisions with our health and welfare paramount. We call upon the National Guard to acknowledge the significance and stewardship responsibilities for some the last remaining large areas of forestland on Cape Cod. Please continue to listen to and honor the wider civilian community on Cape Cod, and consider alternatives to your current proposal. Our trees contribute oxygen to the air we breathe, reduce the impacts of climate change, and are integral to the overall ecological health of our environment.

We also ask you to please consider adding more public representation to your decision-making process. Our mutual health and well-being depend on your making the best, most informed decisions for Cape Cod now and into the future.

Sincerely,

*Joseph Masse*

Joseph Masse  
President

\*References

Cape Cod Today (www.capecod.today) December 29, 2007. "Today in Cape History: Camp Edwards recommended for nuclear processing plant" - 1958.

Final Fifth Year Review, 2012-2017, Joint Base Cape Cod Superfund Site, Otis Air National Guard Base, MA; September 2018, AFCEC/JBCC, Installation Restoration Program, Otis ANGB, MA 02542.

Massachusetts Executive Order 414: Establishing the Upper Cape Water Supply Reserve and Commission. 1999.

US Environmental Protection Agency, <https://www.epa.gov/superfund/superfund-success-stories-epa-region-1#otis>.

US Geological Survey. Fact Sheet 2006-3096. Cape Cod Toxics Substances Hydrology Research Site. June 2006.

**From:** [Grove Harris](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] aghast at proposed clearcutting at Camp Edwards  
**Date:** Monday, September 7, 2020 3:41:47 PM

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Dear Mr. Driscoll,

I write in great dismay over the very idea of clearcutting about 170 acres of mature forest on Cape Cod. This has a huge environmental impact, and represents unnecessary destruction, out of touch with the current climate emergency. Sharing resources with Vermont to conduct training there is reasonable- why on earth destroy more forest just to have a Massachusetts range? People will still have to travel to access it.

I live in Barnstable County and own my home there- I can tell you first hand that we are seeing the impacts of climate change, and that the deforestation already prevalent on Cape Cod is a tragedy. I appreciate the Massachusetts Army National Guard (MAARNG) for asking 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, and I say to you that the findings are seriously in error, using backward thinking and false measures.

Please rethink the financial investment in this proposed clearcutting, and look for other alternatives, including inviting community input and ideas, prior to extensive development of a proposal that goes in the wrong direction. Any map of the Cape will show the incredible amount of forest lost over recent decades, this simply has to stop as much as possible. Forests are the lungs of our planet, and our collective lives and future. The calls to rewild and reforest grow louder, and your plan flies completely in the face of that, and unnecessarily so. Continuing sharing in Vermont seems sensible, as does considering other already devastated landscapes for repurposing. Clear cutting mature forest is in no way a reasonable option.

Leadership at this time must include new perspectives, not just old solutions and old thinking. The public good is very much put at risk by this plan. Environmental damage leads to conflicts, the very ones you're thinking to control with machine gun training!

Please reconsider.

Yours,  
Grove  
Grove Harris  
95 Fifth Avenue/ PO Box 9  
Barnstable, MA 02672

# Saint Barnabas Episcopal Church

A pathway to God through prayer

Commenter  
#303

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

September 7, 2020

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

Page | 1

Re: Comments on Environmental Assessment for a Multi-Purpose Machine Gun Range at the Known-Distance Range at Camp Edwards, Joint Base Cape Cod.

Dear Mr. Driscoll:

The Outreach Ministry (Outreach) of St Barnabas Memorial Episcopal Church in Falmouth submits this letter on behalf of Outreach members in response to the request from the Massachusetts Army National Guard for comment on its Environmental Assessment (EA) for the proposed Multi-Purpose Machine Gun Range (MPMG) at Camp Edwards, Joint Base Cape Cod, Barnstable County, Massachusetts. First, we appreciate the important role of Camp Edwards as the primary military training facility for National Guard and Army Reserve soldiers throughout New England. We commend your responsive planning to the 2016 publication of *Training Circular (TC) 25-8, Training Ranges*. We are however, deeply concerned about the finding of no significant impact (FNSI) because the EA does not consider the rapid changes in climate and the related ecological devastation between 2016 and present.

Since the initial planning of this range, the broadly accepted state of the climate and likely future outcomes have become substantially worse, with our rate of change matching the Intergovernmental Panel on Climate Change (IPCC) Assessment Representative Concentration Pathway (RCP) 8.5, previously considered an extreme, alarmist scenario <sup>1</sup>. Warming scenarios differ in when certain global changes will be seen, but the progression of every pathway begins with dangerous weather including heat waves, excessive precipitation events, and severe storms. The next phase is catastrophic, with devastating, irreversible losses that are in fact tipping points, global changes that feed into climate change and rapidly push temperatures higher <sup>2</sup>. These catastrophes include altered jet stream flow; changing ocean currents, including thermohaline circulation; the dieback of coral reefs, boreal forests, and rainforests; thawing permafrost; and the loss of polar and glacial ice. The tipping points feed into each other as well as into climate, and as of 2019, nine of the identified 15 tipping points were active, suggesting that we are in a state of planetary emergency <sup>3</sup>. Every week brings additional news of tipping point activity, and we are facing the possibility of reaching the point where we can no longer change Earth's trajectory toward an uninhabitable planet <sup>4</sup>. The climate tipping points tie into biodiversity loss, and we are losing our planet's life and life-support systems in the ongoing 6<sup>th</sup> mass extinction <sup>5</sup>. Finally, deforestation alone is enough to drive human civilization to collapse within two to four decades <sup>6</sup>, and the Army may itself collapse from climate change <sup>7</sup>. Outreach strongly supports Falmouth's declaration of a climate emergency, to be considered at town meeting next week. Further, Outreach is working with others in our diocese to present a resolution of climate and ecological emergency to the convention of the Diocese of Massachusetts. We believe that at this point in time, no deforestation is negligible, and no death is negligible.

To adequately assess the environmental impacts of the MPMG proposal, we assert that the EA should be reevaluated for the air quality, and we ask for a more detailed greenhouse gas (GHG) assessment, breaking out the different types of GHG generated by the different scenarios, and including GHG impacts for the preferred and alternative proposals in the Executive Summary and in Section 5. Comparison of Alternatives and Conclusions. Rather than normalizing GHG to carbon dioxide equivalents, keeping the information broken out to identify the super pollutants (nitrous oxide, halocarbons, methane, etc.) will better predict impacts <sup>2</sup>.



# Saint Barnabas Episcopal Church

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*A pathway to God through prayer and service.*

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Related to the air quality, the GHG impact of the forest loss and the changes in the soil's organic matter should also be included. Soil organic matter and soil organisms are important in carbon cycling and carbon sequestration<sup>8</sup>. The EA states, "The evaluation performed within this EA concludes there would be no significant adverse impact, either individually or cumulatively, to the local environment of quality of life." The use of the word "cumulative" here does accurately apply over time because the GHG analysis did not take into account the annual carbon sequestration of the forest vs the land use changes.

We also believe the effects of forest fragmentation should be reassessed. According to 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 with require large ranges of interior forest habitat." Habitat fragmentation reduces biomass and biodiversity, and alters nutrient cycling<sup>9</sup>.

We suggest the impacts to soil and aquifer be re-evaluated to include toxicity and impacts on the animals, microbes, and plants, and well as humans.

Finally, moving beyond the scope of EA comments, yet relevant in 2020, we suggest a high-level reconsideration of mission priorities in light of the 2019 reports by the US Army War College and Department of Defense regarding the impacts of climate change<sup>7,10</sup>. Risk assessment and mitigation strategies may affect land use priorities at Camp Edwards because of its temperate location in the northeast corridor, and its position on an aquifer. Preserving infrastructure, especially the grid, in the populated region, preserving freshwater resources, and providing new services if bases in the southwest US become unusable.

Thank you in advance for your consideration of these comments.

Respectfully submitted,



Bette Hecox-Lea  
St Barnabas Outreach Ministry Chair  
508-367-3748 (cell)  
[stboutreach@gmail.com](mailto:stboutreach@gmail.com) (Outreach email)

cc: St. Barnabas Rector  
St. Barnabas Vestry  
St. Barnabas Office



References:

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**From:** [hughes.p](mailto:hughes.p)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](mailto:Driscoll, Keith J NFG NG MAANG (USA))  
**Subject:** [Non-DoD Source] Machine Gun Range Proposal Has Environmentalists Up in Arms  
**Date:** Monday, September 7, 2020 11:13:19 AM

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Commenter

#304

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.

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Caution-<https://bit.ly/3jALJH6>

We wish to object to this proposal due to environmental and noise concerns.  
Deb & Paul Hughes  
11 Hampton Ct  
Mashpee, Ma 02649

Sent from my Verizon, Samsung Galaxy smartphone

Commenter

#305

**From:** [Mary Ann Jones](#)  
**To:** [Driscoll, Keith J NFG NG MAANG \(USA\)](#)  
**Subject:** [Non-DoD Source] machine gun range  
**Date:** Monday, September 7, 2020 1:05:40 PM

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The overall threat to Cape Cod is climate change. Your project flies in the face of the science and outcome of climate change, already happening, already a known danger, the encroaching sea menacing the land, the homes, and livelihood of Cape Codders. You must be aware that the Northeast coast is considered the canary in the coal mine in the fallout from climate change, that the drop line from what the Maine coast is already experiencing falls directly to Cape Cod. Yet, you propose a massive onslaught of building, clear cutting, and military activities that will only exacerbate the dangers we face. What good are machine guns against climate change? What is the motive for this invasion other than to assert scale and dominance? Land swaps, berm building, catching lead and copper bullets, these things will not placate those of us who fear the loss of unique environment. We are citizens with certain rights and privileges. We will not put our concerns aside nor see them relegated to collateral damage. This project cannot go forward.

I am,

Mary Ann Jones  
Harwich Resident  
508-432-3114

# RESTORE:



Commenter  
#306

September 7, 2020

**Submitted via email to: Keith.J.Driscoll.nfg@mail.mil**

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

**RE: Comments on Draft Finding of No Significant Impact for the Massachusetts Army National Guard Proposed Construction and Operation of a Multi-Purpose Machine Gun Range, Camp Edwards, Joint Base Cape Cod, Barnstable County, Massachusetts**

Dear Mr. Driscoll:

I am writing on behalf of RESTORE: The North Woods to comment on the draft Finding of No Significant Impact (FONSI) for the *Massachusetts Army National Guard Proposed Construction and Operation of a Multi-Purpose Machine Gun Range, Camp Edwards, Joint Base Cape Cod*. RESTORE has hundreds of members and supporters across the Commonwealth of Massachusetts who have a direct interest in ensuring the health of the Cape Cod ecosystem and of people who live in and visit the area. Our staff and board have more than 35 years of experience in reviewing, commenting on, and appealing documents and decisions produced under the National Environmental Policy Act (NEPA).

In the draft FONSI, Col. Anthony Hammett states:

*After careful review of the EA, I have concluded that implementation of the Proposed Action would not generate significant controversy or have a significant impact on the quality of the human or natural environment. [p. 3]*

On the contrary, we believe that this project is extremely controversial among the people who have learned about it. And we believe the Environmental Assessment (EA) provides only a superficial review that does not adequately assess the true impacts of moving forward with this project. Therefore, we strongly oppose the construction of this facility and recommend that the proposal be abandoned.

There was minimal public notice regarding the availability of the draft FONSI and final EA. It is highly likely that few people on Cape Cod, much less elsewhere in Massachusetts, have even heard about the project. It appears that no nonprofit organizations were officially notified. Our organization only learned about the availability of the documents for public comment a few days ago. Yet, the process only allows a 30-day public comment period. This is a completely inadequate timeframe for citizens to review the 111-page document, analyze its contents, and compile and submit comments. We urge you to extend the public comment at least another 30 days and to reach out

In light of the short timeframe, our comments only touch on a few of our questions and concerns.

### Negative Impacts on Wildlife and Ecosystems

The Final EA states

*Construction activities would include up to 199.0 acres of disturbance and would require up to 170.5 acres of tree clearance to accommodate the range footprint, small arms range operations and control area (SAROCA) facilities, utility extensions, access and maintenance road development, and firebreaks to maintain or improve pitch pine and scrub oak (PPSO) and scrub oak shrubland (SOS) conditions while reducing wildfire hazard from tracers and other ignition sources. Approximately 5,197 acres would be required for the MPMG Range to accommodate the SDZs associated with the proposed weapons and ammunition [p. ES-1].*

In other words, 170.5 acres of forest would be liquidated and a far greater area would be severely degraded. Cutting down a large tract of forest will release significant amounts of carbon and worsen climate change, spread invasive species, churn the thin soil, and increase fire risk by opening the forest to increased heat and drying. Although the EA claims this forest liquidation would “maintain” or “improve” PPSO and SOS conditions, but there is no evidence in the EA to substantiate any substantive ecological benefits that would be provided.

On the other hand, the EA acknowledges

*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 proposed MPMG Range footprint is primarily comprised of disturbed land, immature pitch pine, pitch pine oak forest, and pitch pine scrub oak. One Federally listed and 34 state-listed wildlife species have been documented at Camp Edwards. [pp. ES-3 to ES-4]*

The full footprint of the MPMG Range project would be much larger than the area of the forest that is obliterated. More than 5,000 acres would be turned into an industrial zone where the firing of heavy weapons would override all other values.

This is a vast area that would be permanently stripped of its natural ecological values. Yet, the EA glosses over the impacts, claiming the project would have:

*Long-term, **less-than-significant** adverse impacts on wildlife species from potential habitat loss and training range operations. [p 2-6; emphasis in original]*

The claim of “less-than-significant” is purely a subjective judgment, and no objective measures or standards for evaluation are offered to ensure that this will be the case.

### Negative Impacts on Groundwater

The EA is shockingly blasé about the potential for serious negative impacts on Cape Cod’s fragile aquifer. The document acknowledges that this aquifer is unique and critically important:

*The predominant source of groundwater is the Sagamore Lens of the Cape Cod Aquifer, designated as a sole-source aquifer under the Safe Water Drinking Act. In 2015, the four military agencies at JBCC (Joint Base Cape Cod) signed a Memorandum of Agreement to*

*implement the JBCC Groundwater Protection Policy to enforce protections for the existing and future water supplies at the JBCC. The groundwater beneath Camp Edwards provides up to three million gallons of clean drinking water daily to Camp Edwards and the towns of Sandwich, Bourne, Falmouth, and Mashpee. [pp. ES-3 to ES-4]*

The EA acknowledges egregious toxic pollution and contamination as a result of past operation of the military base.

*The JBCC's use as a military training area has resulted in potential and confirmed contamination at the installation, resulting from munitions, firefighting activities, chemical/fuel spills, legacy landfills, and sewage treatment facilities (Cape Cod Commission, 2020). Past operations and waste disposal practices have resulted in subsurface contamination in areas near the Impact Area, where the existing KD Range is located. Contaminants include fly ash, bottom ash, waste solvents, waste fuels, herbicides, and transformer oil. Additionally, seven groundwater plumes in the Impact Area are undergoing extraction and treatment. The nearest plume, located on L Range, is approximately 0.5 mile to the east of the KD Range. The plume is being remediated and is unlikely to affect conditions at the KD Range. Affected Environment Final Environmental Assessment, Proposed Construction and Operation of an MPMG Range 3-24 Camp Edwards, Sandwich, Massachusetts August 2020 monitoring and operation and maintenance of treatment systems are expected to continue until groundwater cleanup levels are met.*

*The ECOP Pre-Construction Assessment (PCA) of the KD Range found evidence of potential contamination, specifically from munitions and explosives of concern (MEC) discovered in the surface and potentially existing in the subsurface (MAARNG, 2019). In addition, known propellant and explosive compounds and heavy metals, including lead, resulting from past range activities were previously identified in the soil. Although targeted soil remediation has been performed, there is a possibility that additional contamination is still present. No stationary sources of HTMW occur within the Proposed Action area, although the area is accessed occasionally by military and civilian vehicles, which could act as mobile sources. Examples of hazardous materials often associated with vehicles include antifreeze, motor oil, brake fluid, hydraulic oil, grease, battery acid, fuel oil, diesel fuel, and other fuels for vehicle maintenance.*

We believe this past toxic legacy, and the failure to ensure adequate clean up to this day, is good reason for skepticism regarding how seriously such problems would be addressed in the future in connection with the proposed machine gun range. Yet the EA claims that there would be

*Long-term, **less-than-significant** adverse impacts on groundwater from inadvertent release of contaminants during site maintenance and training operations. [p. 2-15; emphasis in original]*

This claim is made with no credible documentation to support it and without any assurance that, despite past negligence, future management and mitigation of pollution would prevent any significant impacts on groundwater. We find this argument ingenuous and unconvincing.

**Conclusion**

We have only focused here on only two of the most egregious negative impacts likely to result from approval and implementation of the machine gun shooting range project. Based on our assessment, our conclusion is that the EA was written with a pre-determined outcome of approving the project. No other alternative was seriously considered — in apparent violation of the National Environmental Policy Act — and the significant potential impacts on the natural and human environments was glossed over. As a result, the EA is striking in its lack of any serious analysis or conclusions and, as a result, the determination that the project is worthy of a Finding of No Significant Impact is wholly unjustified.

For these reasons, we strongly oppose the approval of the project as now configured and justified. We believe that Massachusetts Army National Guard Joint Force Headquarters needs to put this process on hold, take a fresh look at the purpose and need for the project, reassess the true potential impacts on the environment, issue a revised EA — or, more appropriately, a full Environmental Impact Statement — and open the process up to broad public review and comment.

Thank you for the opportunity to comment on the draft FONSI. We look forward to your timely response to our questions and concerns.

Sincerely,

Michael Kellett  
Executive Director  
RESTORE: The North Woods  
P.O. Box 1099  
Concord, MA 01742  
(978) 392-0404  
kellett@restore.org

Frederick S. Lane  
4 Great Bend Road, East Sandwich, MA 02537  
Telephone: (508) 888-8619 Email: [Lane.Fred@gmail.com](mailto:Lane.Fred@gmail.com)

Commenter  
#307

September 3, 2020

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

Dear Mr. Driscoll:

I am writing to express the outrage of many living here on the Upper Cape regarding the proposed Machine Gun Range for Camp Edwards.

Here are our questions:

1. Why has this proposal suddenly and at the last minute become a topic for public discussion? Why has there been no public forum or hearing? Why has there been – from the beginning – no discussion with the Select Boards or Town managers of the four Upper Cape towns, or with the Barnstable Assembly of Delegates or County Commission, or the Cape Cod Commission? From here, it appears that, in the middle of a pandemic and election season, the MAANG is trying to quietly slip an eight-lane, machine gun range onto Camp Edwards.
2. Why was there no environmental impact assessment by a neutral, outside firm with the expertise and relevant experience? In the fragile environment of the Upper Cape, the prospect of using 5,000 acres and clear-cutting 170 acres of trees for this purpose seems foolhardy. Environmental degradation affecting land, water, air, and animal species seems inevitable, and the ear-shattering noise pollution unimaginable in this setting.
3. Precisely what weapons will be used on this “automated” “multipurpose” range? Are we talking about .50 caliber machine guns, mounted M240B machine guns, and Mk19 grenade launchers? What else?
4. Why are limited temporary trips to existing machine gun ranges in Vermont and New York so difficult? The proposal makes no reference to the increasing use of virtual reality and other technologies to train troops, including the New Jersey National Guard, thereby minimizing travel to live-fire ranges.
5. Why is the proposal insensitive to the considerable experience of those of us living on the Upper Cape with land and ground water contamination at Joint Base Cape Cod/Otis Air



Force/Massachusetts Military Reservation/Camp Edwards. I am told that this area has been the nation's largest government-mandated and government-funded environmental cleanup project.

Congressman William Delahunt proposed closing Camp Edwards in 1998. A year later Massachusetts Governor Paul Cellucci recommended turning the northern 15,000 acres into a state conservation area. Your proposal should be withdrawn – and further suggests that it may be time to completely re-purpose the Camp Edwards area.

Respectfully submitted,

Frederick S. Lane

c: The Honorable Charlie Baker, Governor of Massachusetts  
MG Gary W. Keefe, The Adjutant General, MA National Guard  
BG John J. Driscoll, Commander, Land Component Command, HAFB