

Susanne Goodman Hallstein  
36 South Rd.  
Falmouth, MA 02540

508-548-1482

Commenter

#352

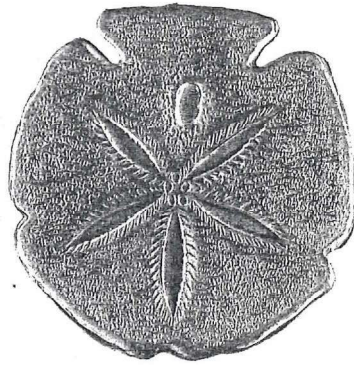
August 26, 2020

Dear Mr. Driscoll,

Imagine a 75 year old, resident of Cape Cod, on her hands and knees begging you not to turn Otis, Camp Edwards, a National Cemetery into a huge firing range.

I came to Cape Cod with my Coast Guard pilot husband forty years ago.

In those 40 years the base poisoned our water, jarred our very core with bombing



noises that rocked my North Falmouth home. - I am not kidding.

I visit the beautiful National Cemetery to put flowers and flags at my late husband's grave.

With tears in my eyes, I plead with you, do not put a ballistic range there.

For me the base represents the end of war and a transformation to natural beauty and peace.

Please let our Veterans rest in peace.

Sincerely,

Susanne Goodman Hallstein



Commenter

#353

August 28, 2020

Keith J. Driscoll  
MAARNG

2 Randolph Rd.

Hanscom Air Force Base, MA 01731

Re: Massachusetts Public Records Request

Dear Mr. Driscoll:

This is a request under the Massachusetts Public Records Law (M. G. L. Chapter 66, Section 10). I am requesting that I be provided a copy of the following records:

I am interested in receiving paperwork and information collected as to the cost (estimate) for removal of trees, vegetation for the proposed machine gun firing range on Joint Base Cape Cod. It is my understanding that cost data was received from local arborist(s) Hamilton Tree. I recognize that you may charge reasonable costs for copies, as well as for personnel time needed to comply with this request.

The Public Records Law requires you to provide me with a written response within 10 business days. If you cannot comply with my request, you are statutorily required to provide an explanation in writing.

Sincerely,

Debra Hennessey

  
569 Currier Rd., East Falmouth, Ma 02536

hnnssyp@comcst.net

To: Keith G. Driscoll  
Subject: mp mg Range

Sept. 1, 2020

Commenter

#354

Dear Mr. Driscoll,

I'm a resident of Forestdale, Ma. I've lived here for 48 yrs. I'm 88 yrs old, with everything that's going on now, there's some thing else for me to be concerned about.

Please rethink this project, the additional noise, activity plus ammunition will affect our area in the worst way.

The National Guard claims that this will have no environmental impact makes no sense,

Don't forget in the 1980's where 12 places on the base were declared Superfund sites of Critical Concern. I believe that clean-up is still on-going from that.

There has to be a better solution for this project, a place where it will have less environmental impact on its region and its citizens.

Looking at the outline the designated surface danger zone where projectiles could land is right in Forestdale's neighborhood.

Sincerely,  
Jessie L. Halland

# Does a military machine gun range fit with your image of Cape Cod?

Commenter #355

By Mary Ann Jones

On page C5 of the Aug. 8 edition of the Cape Cod Times was the Massachusetts Army National Guard's proposal for the "Construction and Operation of a Multi-Purpose Machine Gun Range at Camp Edwards, Joint Base, Cape Cod."

The proposed range would comprise 199 acres plus the 5,197 acres required to accommodate the Surface Danger Zone, covering close to 5,400 acres in total. Will a multi-purpose machine gun range at Camp Edwards fit with your image of Cape Cod's future?

Does the idea of more than 170 acres of forest cleared for said range footprint, the small arms range operations and control area facilities, the addition of lighting, utility extensions access and

maintenance road development and firebreaks jibe with the Draft Finding of No Significant Impact claimed by the Massachusetts Army National Guard? Acres of forest destroyed for machine gun practice and no significant environmental, cultural or socioeconomic effects on us? And what about our wildlife, flora and fauna? No significant impact?

Does the fact that no other Army standard multi-purpose machine gun range exists in Massachusetts move you to want to be the one and only multi-purpose machine gun range for any and all trainees statewide as well as "other military users" assigned training missions?"

Rather than the refuge it has become in a pandemic, is our fragile peninsula to become a military designation and our two aged and structurally

compromised bridges to be replaced to accommodate the influx of military?

We are in the grips of uncertain times, politically sensitive times. The money spent on this venture is better used for environmental, cultural and socioeconomic survival. War games are past. What is needed in the current battle for technology and information is not more machine gun training, but more technical training.

We have less than a month to submit comments on this proposal. Send to Keith J. Driscoll, MAARNG, 2 Randolph Road, Hanscom Air Force Base, MA 01731 or email Keith.J.Driscoll.nfg@mail.mil.

This is urgent. Do it now.

Thank you for doing your part in preserving Cape Cod. Mary Ann Jones is a resident of West Harwich.

8/26 CC Times

7/2

I AM WAITING  
EXPRESS MY  
DISPLEASURE AT  
THE IDEA OF  
CLEARING AWAY A  
FOREST OF TREES  
AND IMPACT ON THE  
WILDLIFE!  
SINCERELY,  
Lynn J. [unclear]



Commenter  
#356

Keith J. Driscoll,  
MAARNG,  
2 Randolph Road  
Hanscom AFB,  
MA 01731

We ask you to give further consideration to the negative ramifications from a machine gun range at Camp Edwards.

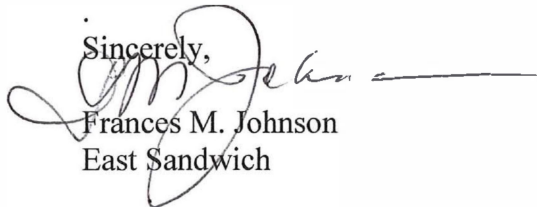
The citizens on Cape Cod continue to suffer with clean water supply from contamination from a previous gun range at Otis AFB. Noise was also an issue.

Our fragile water plume is our connection to clean water...of course the environment and air quality is also of concern. The clearing of trees and acres of foliage will greatly effect the environment and prove to be detrimental. We have two aged bridges connecting us to the mainland. Traffic is an issue presently. The range would add to the congestion and traffic.

We are in a wholesome family community and have become neighbors with the bases. Please respect us as your neighbors as well. We hope to keep the Cape and our town a safe home for future generations. The Cape with its many quaint towns is not the correct real estate for such a range.

We live in Sandwich the oldest town on Cape Cod --certainly other locations are available and more suitable for the range that is being proposed for Cape Cod.

Sincerely,



Frances M. Johnson  
East Sandwich

Commenter  
#357

# np Edwards

*machine guns,  
shot guns, grenades  
& Pistols*  
How to submit  
comments

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*NO*  
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The public may submit written  
comments on the environmental  
assessment of the proposed  
machine gun range until Sept.  
8 to Keith J Driscoll, MAARNG,  
2 Randolph Road, Hanscom Air  
Force Base, MA 01731, or via  
email to Keith.J.Driscoll.nfg@  
mail.mil.



September 3, 2020

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

Mr. Driscoll:

The proposal to install a military machine gun range at Camp Edwards, the Massachusetts Army National Guard area at Joint Base Cape Cod is extremely inappropriate. There are elder citizens living in very close proximity to the area, as well as young elementary school children within a very short distance who would be subjected to this machine gun barrage.

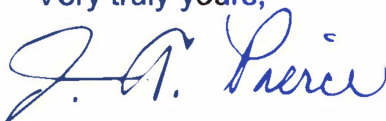
Our family has been here long enough to remember the range shooting at the base when our homes were shaken with the explosives, children and pets frightened and cracks appeared in our home walls.

Your proposal would bring back the same horrors. To state that the "noise in surrounding neighborhoods would be varied" is preposterous. The intense noise, peaking at 130 decibels, would not be contained within the base as you state. How ridiculous and untrue that statement is.

As you know, our two antiquated Cape Cod bridges (not including the railroad bridge) are presently over burdened. The three-season tourists are backed up for miles. Presently, we are planning two replacement bridges in the next decade. How are our merchants, restaurants and small business people to tolerate more traffic from your proposed installation?

The machine gun range should be installed at Camp Ethan Allen in Vermont or in upstate New York, in less populated areas than Cape Cod.

Very truly yours,



J. A. Pierce  
30 Emerald Way  
Forestdale, MA 02644-1530

cc: Bud Dunham, Sandwich Town Manager  
EPA  
C. Legere, CCT

Commenter  
#359

## Diane Richardson

30 David Street  
Osterville  
Massachusetts 02655  
508-420-5072

August 27, 2020

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

Subject: Proposed machine gun range at Camp Edwards

Dear Mr Driscoll,

I am very dismayed by the proposal to establish a machine gun range at Joint Base Cape Cod.

Not only is it out of character for a place that is visited by vacationers and has substantial water contamination issues, it is also a sacred place where our truly courageous men and women that have served our Country in wars have been laid to rest at the National Cemetery - which is across from the proposed machine gun site.

I recently laid my husband to rest at the National Cemetery in Bourne, just across from where the machine gun range has been proposed, and where I visit several times a week to sit in quiet with my thoughts and prayers. My husband, David E. Richardson was a Major in the Army. He served two tours in Korea and one in Vietnam during military conflicts in both regions. He served for 22 years putting his life at risk to protect our Country and its values.

To disrupt and disturbed such a sacred place as The National Cemetery with the noise of war is of utmost concern to me and , I feel, disrespectful to the lives lost in war and those that passed after such dedicated service to our country. In addition, as a

frequent visitor to this sacred place the disturbance of the noise of war can only serve to even further upset (and remind) those left behind after the loss of a loved one.

I understand the need for weapons practice by our military and our Countries need to have a well trained and ready force, however I have to believe that within the Unites States we have a better place to establish this training. One that is not as close to neighborhoods, one that is not a place that is a rest bit for vacationers, one that does not operate on an acquirer that provides clean water throughout Cape Cod and **surly** one that does not disrespect our deceased members of the military and the many family and friends that come to visit with them. Quite provides healing for those left behind, a time to ponder on memories and “speak” with their loved ones. Out of respect and dignity I beg you to reconsider this decision.

Please consider the many reasons that this proposed place is not the right place for this kind of activity.

Sincerely,

  
Diane L. Richardson

Cc: Senator Ed Markey

Senator Elizabeth Warren

State Senator Julian Cyr

State Representative William Crocker

Commenter  
#360

To: Keith Driscoll  
MAA Eng  
2 Randolph Rd.  
Hanscom Air Force Base  
MA 01731

September 3, 2020

I am a resident of the Town of Chatham and am writing to express my opposition to the proposed construction and operation of a Multi-Purpose Machine Gun Range (MPMG) on Camp Edwards. There are many reasons for MAARNG to reconsider its decision to develop a MPMG range on Cape Cod.

Certainly, paramount among them is that Cape has suffered enough from pollution caused by past practices on the base. Until all pollution has been contained and cleaned up no further construction should take place at Camp Edwards. We still have water plumes in the groundwater which are a serious threat. Plumes of groundwater still flow from under the Central Impact Area into the vicinities of public water supplies, residential wells and surface waters.

The Cape, as I am sure you know, is a single source aquifer. Therefore, the degradation at the top of the aquifer migrates and causes degradation to all. The MPMG Range has the potential for adding toxic chemicals to the air and groundwater so definitely should not be allowed in the middle of a regional watershed.

To be built and serviced, the proposed Range calls for the clear cutting of over 170 acres of forest, the development of new roads and the extension of utility lines. This type of destruction on top of decades of previous harm caused by military weapons practice and live artillery fire is simply unnecessary. We have documented incidents of soil and groundwater contamination with toxic substances which contaminated millions of gallons of the Upper Cape's drinking water.

According to MAARNG's own report, situating a MPMG Range on Cape Edwards will increase traffic by 18.6% or up to 17,650 man-days. Cape Cod is currently suffering from traffic problems on our roads and bridges and this increased traffic

will cause further air and water pollution. It is costing local communities millions of dollars to clean up contaminated groundwater and this won't help.

The environmental impact report concludes that there will be "less than significant impacts." However, there has been no investigation or even consideration of the cumulative impacts of decades of pollution and degradation in this area. Why should we trust the report when residents had to fight for years to get the government to take seriously their complaints and begin a major clean-up at the base and in areas around it.

Training facilities must exist elsewhere. Why should Cape Cod residents once again have to pay the price of additional damage to our drinking water, our soil, our ponds and our health?

Sincerely,

A handwritten signature in cursive script that reads "Florence Seldin".

Florence Seldin  
321 Deer Meadow Lane  
Chatham, MA 02633



Commenter

#361



9/1/20

Mr. John D. Sullivan

Keith Driscoll

As a former Army  
Nat'l Guard, I'm  
call for this gun  
range. This  
New Jones is at least  
20-25 miles from  
Camp Edwards

Nobody wants to  
go to Vermont or Eldestate  
New York for 2 weeks  
on back of deer  
and a half to shoot  
guns.

John Sullivan  
508-775-5703

## Machine gun range of Cape

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Commenter

#362

2 September 2020

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

Dear Mr. Driscoll:

I am writing as a Cape Cod resident in strong opposition to the Construction and Operation of a Multi-Purpose Machine Gun Range at Camp Edwards, Joint Base, Cape Cod.

The Association to Preserve Cape Cod has called for a thorough Environmental Impact Study "to carefully study the impacts this project would create, propose appropriate mitigation and reexamine the potential viability of the rejected project alternatives."

Clear-cutting 1700 acres will surely impact the environment. Cape Cod Commission Executive Director Kristy Senatori cautions that "clearing or development activities of the scale proposed by this project in a water supply area could negatively impact underlying water and natural resources."

Your own Environmental Assessment notes that noise from the range will affect "multiple residential neighborhoods as well as an elementary school."

In addition the base is still cleaning up 42 Superfund Sites of Critical Concern. It's hard to imagine how more runoff from more spent ammunition -- also a fire hazard -- will aid the clean-up.

In short, this project requires more assessment and, importantly, more communication with the Cape Cod towns and residents who will have to live with the noise, pollution, and other hazards this project will bring.

Thank you,



Mary Hunter Utt  
10 Captain Linnell Road  
Orleans, MA 02653  
mary.h.utt@gmail.com

Commenter

#363

I am against  
the Military Run  
Range —  
Lucile White  
Box 398  
10 Dolphin Way  
Dennis, MA  
02628

8/8/2020

Commenter  
#364

My View

Questioning the Militarizing of Cape Cod: The Construction and Operation of a Multi-Purpose Machine Gun Range at Camp Edwards, Cape Cod (Aug. 8, 2020 Cape Cod Times, back page notification, C-5.)

Does a multi-purpose machine gun range at Camp Edwards fit into my future image of Cape Cod? The proposed MPMG range would comprise 199 acres, plus the 5,197 acres required to accommodate the Surface Danger Zone, whatever that entails.

Does the idea of 170+ acres of forested land cleared for said range footprint, the small arms range operations and control area facilities with the addition of lighting, utility extensions, access and maintenance road development and firebreaks jibe with the Draft Finding of No Significant Impact (FNSI) claimed by the Massachusetts Army National Guard? Acres of forest cleared away and replaced by machine gun practice and no significant environmental, cultural, or socioeconomic effects on us, to say nothing of our wild life? Far-fetched claim.

Does the fact that there is no other Army standard MPMG Range in Massachusetts cause you to want this designation for Cape Cod, to become the ONE, the only multi-purpose machine gun range in Massachusetts, hosting any and

all trainees in all of Massachusetts, and, as stated, “other military users’ assigned training missions”<sup>1</sup>? Such as the “Homeland Security” in Portland recently?

Instead of the refuge it has become in a pandemic, is our fragile peninsula to play host to all military who will presumably travel over our two aged and structurally compromised bridges? Is this why the Army Corp of Engineers finally agreed that replacement was due?

We are in the grip of uncertain times, politically sensitive times, the money spent on this venture is better used for environmental, cultural and socioeconomic survival. War games are past. What is needed in the current battle for technology and information is not more machine gun training, but more comprehensive training in technology and communications.

To give us less than a month to submit comments on this proposal is a strategy I object to, as much as I object to the proposal itself with its hidden agenda.

Send to Keith J. Driscoll, MAARNG, 2 Randolph Road, Hanscom Air Force Base, MA 01731 or e-mail . This is urgent. Do it now. Thank you for doing your part in preserving Cape Cod.

Mary Ann Jones



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<sup>1</sup> As stated in Cape Cod Times Notice of Availability (Aug.8, 2020) p. C-5.



28 Jasper Moore Trail

Harwich, MA 02645

August 9, 2020

Commenter  
#365

Keith J. Driscoll, MAARNG

2 Randolph Road

Hanscom Air Force Base,

MA 01731

Dear Mr. Driscoll: RE: New multipurpose MPMG Range at Camp Edwards

This is to respond to the proposed MPMG Range at Camp Edwards in which 170.5 acres of forested land is to be cleared and converted to grassland in the control area on the Joint Force Military Base. Cape Cod, on which the military base is located, is a fragile ecological piece of land, that is, essentially an island because of the canal. To site such a shooting range within these confines seems unreasonable. The justification being that such an Army standard MPMG Range does not exist within Massachusetts seems absurd when one considers that Massachusetts is the 8<sup>th</sup> most forested land in the United States with 60.4 percent of our state forested. We here in Massachusetts have 3.1 million acres of such land (though 79% are in private ownership). Surely it is possible to site a multipurpose machinegun range in a more sparsely populated, less vulnerable place than Cape Cod where accommodation could be made to achieve the desired Surface Danger Zone.

This is a tourist centered area which is reached by two bridges spanning The Cape Cod Canal that are famously overcrowded with traffic backlog. Our existing joint military base need not be added to with those units coming here for deemed necessary practice. Plenty of forested land exists elsewhere in Massachusetts.

Additionally I have issue with the use designation of other military users' assigned training missions. In the light of our most recent controversial use of quasi military and Para-military personnel, I am concerned with the usurpation of local military guard and local police under the control of our state governor to that of the national guard being activated under the federal government and the President. Furthermore, I would discourage any enlistment of local people to those uses of MPMG Range. I caution the possibility of such use in the conversion of locals by the federal government in the intervntional use of "other military users" of such forces within our state boundaries.

Hence I ask that the use of such a machine gun range, if and when it is established, be strictly limited to those clearly and specifically designated traditional military forces.

Respectfully  
Kathleen O'Brien

**Commenter**  
**#366**

**From:** Timmermann, Timothy <[Timmermann.Timothy@epa.gov](mailto:Timmermann.Timothy@epa.gov)>  
**Sent:** Wednesday, September 16, 2020 2:39 PM  
**To:** Driscoll, Keith J NFG NG MAANG (USA) <[keith.j.driscoll.nfg@mail.mil](mailto:keith.j.driscoll.nfg@mail.mil)>  
**Cc:** Timmermann, Timothy <[Timmermann.Timothy@epa.gov](mailto:Timmermann.Timothy@epa.gov)>; Dolan, Jane <[Dolan.Jane@epa.gov](mailto:Dolan.Jane@epa.gov)>, Loughlin, Anni <[loughlin.anni@epa.gov](mailto:loughlin.anni@epa.gov)>  
**Subject:** [Non-DoD Source] Comments on the EA/FONSI for the Multi-Purpose Machine Gun Range at Camp Edwards

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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Dear Mr. Driscoll:

We are writing to comment on the EA/FONSI for the proposed Multi-Purpose Machine Gun Range at Camp Edwards. Although we offered scoping comments prior to the preparation of the EA we did not receive a copy of the EA/FONSI when it was published. We worked promptly to prepare the comments below when we became aware of the document. We appreciate your willingness to consider our comments as you work to finalize the EA and FONSI for the project.

General Comments

We recommend that additional information be provided in the EA/FONSI to more fully describe the potential environmental impacts associated with the Proposed Action and to support any conclusion reached regarding the magnitude of the expected impacts.

The Proposed Action is for the Massachusetts National Guard (MAARNG) to be able to train with the M249 and M240 (5.56 mm and 7.62 mm) weapons systems; however, Table 2-2 indicates that additional weapons systems and ammunition are proposed to be used on the proposed range.

Recommendation: We recommend that the EA/FONSI list the constituents of the propellants, primers, bullets, and cartridge cases for all weapons systems and bullets (including grenade launcher MK19) proposed for use on the range and why adverse environmental impacts from the use of these weapon systems and ammunition are considered less than significant. List the constituents of tracers, flares, and simulators that are proposed for use on the proposed range and why adverse environmental impacts from these training activities are considered less than significant.

The EA/FONSI would benefit from a more complete description of the baseline and expected contaminant loading of project area soils due to the firing of ammunition on the proposed range.

Recommendation: We recommend that the EA/FONSI describe the baseline and expected contaminant loading of project area soils due to the firing of ammunition on the proposed range. It may be appropriate to summarize and reference the findings from the KD Range Post-DD Confirmatory Geophysical and Soil Investigation performed by IAGWSP in accordance with AO3 and the Training Ranges and Small Arms Ranges Decision Documents.

The June 2020 SEIR explains that the range has been designed and will be designated as a copper ammunition only range. This design parameter was not highlighted in the EA/FONSI.

Recommendation: We recommend that the copper only ammunition designation be highlighted in the EA/FONSI as it bears directly on the potential for environmental impacts from the proposed range. We recommend that the EA/FONSI specifically explain whether this measure will apply to all training devices to be used at the facility. Please note that in a letter dated 8 January 2012 concerning the MAARNG's proposed use of M855A1, 5.56mm, copper ball ammunition (Enhanced Performance Round (EPR)) at Sierra and Tango Ranges, EPA stated that the use of the proposed EPR did not appear to violate the terms of EPA's Administrative Order No. 2. EPA urged MAARNG to complete a full review of all the environmental effects of the bullets, and urged MAARNG to coordinate closely with the EMC on the development and implementation of any further studies and the establishment and implementation of appropriate Operation, Maintenance and Monitoring requirements for range use. It is EPA's understanding that MAARNG has consulted closely with the EMC during the range design process and we recommend that coordination be referenced in the EA/FONSI.

The EA does not include a discussion of hazardous and toxic materials and waste.

Recommendation: We recommend that the EA and FONSI list all hazardous and toxic materials and waste proposed to be used or generated during construction activities, and during training operations and site maintenance.

### Specific Comments

Line 562 – Please explain how projectiles would be captured, how these projectiles would be collected and recycled/disposed, and how potential impacts to the environment would be measured and at what frequency.

Line 592 – Please describe the specific components of the antiterrorism and force protection (AT/FP) measures for the proposed range and whether they would result in environmental impacts.

Line 1445 – “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.” Please explain where these contaminants were detected. “Additionally, seven ground water 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.” EPA notes that the L range plume does not travel in the direction of the KD Range. Please describe the current (baseline) and expected future ground water quality beneath and in the vicinity of the proposed range.

Line 1741 – “Construction of the Preferred Alternative would result in short-term, *less-than-significant* adverse impacts on groundwater. During land conversion activities, the use of construction equipment and materials could inadvertently release contaminants or toxic materials (e.g., fuel and other petroleum products) into groundwater. Similarly, site maintenance and training operations could lead to the inadvertent release of contaminants, creating a long-term, *less-than-significant* adverse impact on groundwater. Section 4.12 discusses potential pollution (i.e., from chemicals, fuels, etc.) impacts attributable to the Preferred Alternative and identifies BMPs that would minimize impacts to the extent practicable.” Section 4.12 does not identify the BMPs that would minimize impacts. Please describe the pollution prevention and mitigation measures related to hazardous and toxic materials and waste (HTMW).

Line 1974 – “Under the Preferred Alternative, short- and long-term, *less-than-significant* adverse impacts associated with HTMW would be anticipated due to minor land conversion activities, as well as maintenance and training operations. The Preferred Alternative would produce minor increases in handling, storage, use, transportation, and disposal of HTMW, resulting from vehicle and equipment during vegetation removal activities and site maintenance. These proposed activities would have potential contamination sources (e.g., diesel fuel, oil, antifreeze, and lubricants). Even without major release events, multiple minor releases could have potential effects to the environment at the proposed firing point locations. Releases over a long period of time could potentially lead to soil and/or groundwater contamination, and thus could require some form of remediation.” Please describe the pollution prevention and mitigation measures for HTMW.

Line 1991 – “In addition, in the event that unexploded ordnance (UXO) or MEC are encountered during construction, an on-call UXO/MEC expert would be contacted immediately for safe handling and removal. This expert would handle all aspects of the removal process to include regulator notification, implementation of safety measures, and removal of such items. The MAARNG would contract an on-call UXO/MEC expert for the duration of the construction phase.” EPA recommends that MAARNG follow IAGWSP protocols established pursuant to the SDWA Orders for the removal of soils under identified UXO/MEC.

Line 2014 – “Under the Preferred and Reduced-Scale Alternatives, no significant impacts would be anticipated; therefore, no mitigation measures are required to reduce potentially significant adverse impacts.” This statement appears to conflict with information provided in Appendix B -A that a significant mitigation plan has been developed to achieve overall net benefit for all potentially impacted state-listed species for this proposed action and other upcoming major construction activities at Joint Base Cape Cod. See also Appendix E.

Lines 2047 and 2057 – No mention is made of the Operations, Maintenance and Monitoring Plan (OMMP) which would be a requirement of the EMC. We recommend incorporating the OMMP in the discussion.

We appreciate your consideration of our comments on the EA/FONSI. Please contact me with any questions.

Timothy L. Timmermann, Director

Office of Environmental Review  
EPA New England-Region 1  
5 Post Office Square, Suite 100  
Mail Code 06-3  
Boston, MA 02109-3912

Email: [timmermann.timothy@epa.gov](mailto:timmermann.timothy@epa.gov) < Caution-mailto:timmermann.timothy@epa.gov >

Telephone: 617-918-1025

E-Fax: 617-918-0025





## The Commonwealth of Massachusetts

House of Representatives  
State House, Boston, MA 02133

Commenter #367

**Dylan Fernandes**  
State Representative  
Barnstable, Dukes & Nantucket

**Legislative Aide**  
Mary Ollen  
[Mary.Ollen@mahouse.gov](mailto:Mary.Ollen@mahouse.gov)

September 7th, 2020

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

Dear Mr. Driscoll,

I write to you today in response to the Environmental Assessment (EA) for the proposed Multi-Purpose Machine Gun Range at Camp Edwards and the EA's findings of "no significant impact." These findings are concerning given the scope of the project and more analysis is needed to understand the potentially harmful impacts of creating this range. I urge you to complete a more comprehensive study through an Environmental Impact Statement (EIS) to examine the loss of carbon sequestration and other climate impacts, create an extensive mitigation assessment, include broader public feedback, and outline alternatives to the project.

The initial Environmental Assessment is an insufficient examination into the short- and long-term impacts of the Machine Gun Range. To say there is no significant impact from clear-cutting 170 acres of forest, the largest deforestation on Cape Cod in recent memory, is incorrect. A more thorough review is needed in order to properly understand the impact of this large-scale project. An Environmental Impact Statement would include:

- A purpose and need statement for the project
- A discussion of reasonable alternatives
- A description of the environment that will be affected
- A broad overview of environmental consequences
- A summary of major conclusions, issues, and areas of controversy

The required report structure of an EIS would allow for a broader analysis of the proposed project and fill in the glaring gaps left by the initial Environmental

Assessment. Public hearings should also be conducted to gather feedback from the greater Cape community.

Climate change is the greatest threat facing our planet and the Cape and Islands are particularly vulnerable to its effects. I am deeply concerned by the EA's disregard for the detrimental impacts of clear-cutting forests. Forests have the potential to sequester over 1 metric ton of carbon per acre per year. Removing 170 acres of forest to create this range would greatly impact the carbon sequestration capabilities of the area. At the very least, if the project moves forward, the National Guard should offset the sequestration losses.

We cannot afford to lose 170 acres of forest on the Cape. Now is the time to take action to prevent climate change, not exacerbate the problem. Instead of the planned 4:1 mitigation ratio, the National Guard should move instead to preserve as much forest as possible, including the 170 acres in question.

The proposed range at Camp Edwards could have devastating environmental consequences and a full Environmental Impact Statement should be prepared before the project advances any further.

Respectfully,

A handwritten signature in black ink, appearing to read "Dylan F", with a stylized flourish at the end.

Dylan Fernandes  
State Representative  
*Barnstable, Dukes and Nantucket*