



Andrew Gottlieb  
Executive Director

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Gina McCarthy  
White House National Climate Advisor

The White House  
1600 Pennsylvania Ave NW  
Washington, DC 20500

Dear Administrator McCarthy:

On behalf of the Association to Preserve Cape Cod (APCC), I am writing to bring your attention to a proposed project on Joint Base Cape Cod in Massachusetts that is of great concern to the citizens of the Cape region and that is grievously inconsistent with the Biden Administration's progressive, ambitious and much-needed policies for confronting our national and global climate crisis.

Founded in 1968, APCC is the leading regional nonprofit environmental advocacy and education organization on Cape Cod. Supported by thousands of members from every Cape Cod town, APCC's mission is to promote policies and programs that foster the preservation of the Cape's natural resources. (APCC.org)

The National Guard Bureau has signed off on a Finding of No Significant Impact (FONSI) for a multi-purpose machine gun range that is to be located on the Upper Cape Water Supply Reserve—the northern 15,000-acre portion of the military base that was established in 2002 to protect drinking water and wildlife habitat and for military training that is compatible with the environmental protection purposes of the reserve. The proposed machine gun range calls for the disturbance of 200 acres of land and clear-cutting 170.5 acres of pine barren forest. The plan also includes approximately 5,000 acres (over one-third of the water supply reserve) for a Surface Danger Zone area where projectiles fired on the range would land.

In addition to great concerns about adverse impacts to the region's water supply, loss of rare species habitat and the largest land clearing on Cape Cod in recent memory, we are particularly concerned about loss of carbon sequestration from the forest clearing. The mitigation proposed by the Guard does not replace the lost

forest or, therefore, its carbon sequestration value, nor does the project analysis adequately or accurately consider the regional climate impacts of the project.

This proposed plan is at odds with the Biden Administration's national climate mitigation policies, which include the utilization of our forests to sequester carbon. Indeed, as you know, President Biden's "30 by 30" plan calls for the protection of 30 percent of the nation's forests and open lands by 2030 as a strategy for mitigating the climate crisis. The Guard's ill-conceived and unnecessary clearcutting of nearly 200 acres of pine barren forest habitat on Cape Cod violates the standards that the military should be following in the greater national effort to reduce the effects of climate change, and to do so while protecting our finite natural resources.

The carbon sequestration value of the to-be-cleared forest will be a net loss in the total carbon sequestration contribution made by Cape Cod's forested lands. The Woodwell Climate Research Center (formerly Woods Hole Research Center) estimates clearcutting the 170.5 acres would release 16,895 metric tons in CO<sub>2</sub> emissions and eliminate the capacity to remove 313 metric tons of CO<sub>2</sub> from the atmosphere each year. And, this does not factor in the added emissions from travel to the Cape from Massachusetts-based Guard troops and the likely addition of future Guard troops from out-of-state, further exacerbating the local climate impact from this project.

Here in Massachusetts, the State Hazard Mitigation and Climate Adaptation Plan (SHMCAP), which was codified in the state's 2018 Environmental Bond, stresses the use of nature-based solutions for climate adaptation and mitigation. It highlights the value of preserving forests for their use as an important source of carbon sequestration, stating that "Massachusetts forests currently absorb more than 15 percent of the carbon generated in Massachusetts every year." This recognition of the value of protecting existing forestlands as a tool against climate change was further reinforced through An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy, comprehensive climate legislation adopted in early 2021 that codifies the importance of "natural solutions" to mitigate climate change.

Recently, Representative William Keating and Senators Elizabeth Warren and Edward Markey wrote a letter to the National Guard Bureau expressing concerns about the project and calling for greater scrutiny of its potential environmental impacts. We respectfully ask that you look into this matter further to ascertain its consistency with the Biden Administration's policies and objectives relating to battling our climate crisis and protecting our natural resources. We hope you will agree with APCC, other Cape Cod environmental organizations and over 90 percent of Cape Cod citizens who submitted public comments on the project in concluding that it is incompatible with national climate policy standards and should not go forward. We are hopeful

that the Biden Administration will put a stop to this ill-conceived project.

Thank you in advance for taking this issue under consideration. I would be most happy you discuss this further with you or your staff if you have any questions or desire additional information. I can be reached at [agottlieb@apcc.org](mailto:agottlieb@apcc.org) or 508-619-3185.

Sincerely,



Andrew Gottlieb  
Executive Director

cc: Secretary John Kerry  
Senator Elizabeth Warren  
Senator Edward Markey  
Representative William Keating  
Governor Charlie Baker  
Lieutenant Governor Karyn Polito  
Attorney General Maura Healey  
Senator Julian Cyr  
Senator Susan Moran  
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