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VIA EMAIL: 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