



CAPE COD  
CLIMATE  
CHANGE  
COLLABORATIVE

October 3, 2020

Submission for *My Turn*

Last month, the Cape Cod Climate Change Collaborative submitted comments to the Massachusetts Army National Guard regarding the Environmental Assessment and Finding of No Significant Impact for the proposed multi-purpose machine gun range on the Upper Cape Water Supply Reserve at Camp Edwards.

The Climate Collaborative is a coalition of organizations, businesses and citizens committed to mitigating climate change impacts, protecting natural carbon sequestration and working toward achieving net zero carbon emissions goals for the Cape & Islands. It is from this perspective of climate responsibility that the Climate Collaborative determined the project's EA and FONSI to be fatally deficient.

The Climate Collaborative believes the proposed range will have significant climate change impacts, which were ignored in the initial review. These impacts must be identified, quantified and thoroughly analyzed, with public input, through the more rigorous review of an Environmental Impact Statement, in compliance with the National Environmental Policy Act. The EA lacks the cumulative impacts analysis, robust alternatives analysis and mitigation assessment required under an EIS. And, the EA failed to adequately involve the public in the process, ignoring the environmental history of pollution at Camp Edwards where remediation is ongoing.

Of greatest concern, the EA failed to account for or quantify the impacts from the loss of carbon sequestration in clearcutting 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 capture and store the carbon pollutants that drive climate change. Research on carbon sequestration indicates mature forests, such as those on Camp Edwards, can potentially sequester between 1 and 1.6 metric tons per acre per year.

The National Guard purports to go through the motions of considering climate change in its assessment, but the outcome fails to reflect NEPA's purposes. NEPA's decision-making requirements are clear: An EA must consider direct, indirect and cumulative environmental impacts of a proposed action 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 thorough analysis and public involvement.

In reviewing the EA, it is clear the National Guard failed to conduct sufficient research to determine and quantify the sequestration losses, and attendant carbon releases, associated

with clear-cutting 170 acres of forest. To determine the climate impacts associated with the project, the EA looked only at emissions associated with vehicle travel to and from the existing range, suggesting the project could have a beneficial impact on climate by eliminating those emissions. As a result, the Cape & Islands region is left with less carbon storage capacity and more GHG emissions.

Consequently, the Climate Collaborative calls for the EA and FONSI to be withdrawn and a new EA prepared in compliance with NEPA, and that a full EIS be prepared.

The state's Environmental Management Commission, which is responsible for enforcement of the environmental performance standards created to ensure protection of water resources and wildlife habitat on the Upper Cape Water Supply Reserve, has the final say on whether the proposed machine gun range is a compatible use for the area. The Climate Collaborative now looks to the Commission, with input from the Citizens Advisory Council and Science Advisory Council, to make the appropriate determination that this project, at the very least, needs to undergo a much more comprehensive—and public—review.

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