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July 17, 2020

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
 ON THE
 SINGLE SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

PROJECT NAME : Final Area-Wide Environmental Impact Report for
 Massachusetts National Guard Properties at the
 Massachusetts Military Reservation (MMR) -- MPMG
 Range
 PROJECT MUNICIPALITY : Sandwich
 PROJECT WATERSHED : Cape Cod
 EEA NUMBER : 5834
 PROJECT PROPONENT : Massachusetts Army National Guard (MA ARNG)
 DATE NOTICED IN MONITOR : June 10, 2020

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G. L. c. 30, ss. 61-62I) and Section 11.07 of the MEPA regulations (301 CMR 11.00), I hereby determine that the Single Supplemental Environmental Impact Report (Single Supplemental EIR) submitted for this project **adequately and properly complies** with MEPA and its implementing regulations.

Project Background and MEPA History

The Massachusetts Military Reservation (MMR)¹ Master Plan was designated as a “major and complicated” project and a Special Review Procedure (SRP) was established as further detailed in the Certificate on the Notice of Project Change (NPC) and the Major and Complicated Procedure (issued July 10, 1997). A Certificate on the Draft Area-Wide EIR was

¹ The MMR was renamed the Joint Base Cape Cod (JBCC) in 2013.

issued on October 22, 1999 and a Certificate on the Final Area-Wide EIR for the MMR Master Plan was issued on July 16, 2001. Several NPCs were subsequently filed and Certificates were issued for NPCs on: proposed upgrades at Bravo, Echo and Sierra Ranges (March 24, 2006); a return to the use of lead-bullet ammunition at MMR (November 9, 2006); changes in the Small Arms Range Improvement Project (SAR-IP) (August 10, 2007); installation of an eXportable Combat Training Capability (XCTC) system (January 22, 2010); Soldier Validation Lane (SVL) training activities (May 6, 2011), and construction of a Unit Training Equipment Site (UTES) facility (February 22, 2013). The November 9, 2006 Certificate on the NPC required a Supplemental EIR which was submitted in August 2012. A Certificate on the Supplemental EIR was issued on September 29, 2012 which found the Supplemental EIR was adequate. The remaining NPCs did not require further MEPA review.

The MMR Master Plan divided the property into two separate sections referred to as the Cantonment Area and Camp Edwards Training Area. The 5,000-acre Cantonment Area (referred to as the southern 5,000 acres in the Final EIR) was identified for new military and civilian development projects. Administrative buildings, barracks, vehicle and equipment maintenance shops, housing, and runways are located in this area. The Camp Edwards Training Area (referred to as the northern 15,000 acres in the Final EIR) was set aside for permanent protection of water supplies, wildlife habitat, and open space, while allowing compatible military training, including a small arms range. The Camp Edwards Training Area is coterminous with the Upper Cape Water Supply Reserve Area, which was created by Chapter 47 of the Acts of 2002. The Reserve is public conservation land dedicated to the natural resource purposes of water supply and wildlife habitat protection and the development and construction of public water supply systems, and the use and training of the military forces of the Commonwealth, provided that such military use and training are compatible with the natural resource purpose of water supply and wildlife habitat protection. The Final EIR proposed a set of Environmental Performance Standards (EPS) which restrict certain activities and provide standards for performance that guide both military and civilian users in the protection of natural, cultural, and groundwater resources within the Camp Edwards Training Area.² The Certificate on the Final EIR required MEPA review for future projects within the Camp Edwards Training Area that exceed certain thresholds, including “lowered thresholds” for activities involving any new impervious area, vegetative clearing or other land alteration (as detailed in the Informational Supplement to the FEIR, dated August 15, 2001).

An Expanded NPC for this project was submitted to the MEPA Office in January 2020. The extensive and detailed Expanded NPC included a request that I allow submission of a Single EIR, and in a Certificate issued March 19, 2020, I granted the request for a Single Supplemental EIR. The Scope for the Single Supplemental EIR was limited to clarifying the mechanism for land preservation and potential impacts to groundwater and identifying potential noise and construction period mitigation measures. The Proponent filed a Single Supplemental EIR for the project on June 1, 2020.

² The EPS were formally established in 2001 under Executive Order 443 and Chapter 47 of the Acts of 2002.

Project Description

The proposed project includes the construction of an eight lane Multi-Purpose Machine Gun (MPMG) Range at the site of the existing Known Distance (KD) small arms range. The MPMG will have six lanes (each 800 meters long) that are 25 meters (m) wide at the firing line and extend to 100 m wide at a distance of 800 m. The middle two lanes will extend an additional 700 meters to a total length of 1,500 meters to accommodate 0.50 caliber rifles. The range has been designed and will be designated as a copper ammunition-only range. The project also includes construction of a series of structures collectively referred to as Range Operations and Control Areas (ROCA); including: range control tower (657 sf), range operations and storage facility (800 sf), ammunition breakdown building (185 sf), bleacher enclosure (726 sf), range classroom building (800 sf), and covered mess shelter (800 sf). The project also includes installation of strategic firebreaks along the exterior of the MPMG range to reduce the risk of a large wildfire and assist in managing the fighting of fires. Installation of the firebreaks will require 10 acres of new gravel road (approximately 4.5 miles) and 77 acres of mowed firebreak edge.

The purpose of the project is to construct a mission required MPMG Range to allow the MA ARNG to efficiently attain required training and weapons qualifications requirements within the state of Massachusetts. Currently, the three closest MPMG ranges are located at Camp Ethan Allen in Vermont (over 270 miles away), Fort Dix in New Jersey (over 300 miles away), and Fort Drum in New York (over 370 miles away). The project will support higher quality, mission-essential training activities at Camp Edwards, while limiting the need for travel to out-of-state training sites and the attendant loss of critical training time and resources.

Project Site

The project is proposed at Camp Edwards, which encompasses approximately 15,000 acres of the 20,554-acre Joint Base Cape Cod (JBCC; formerly known as the MMR). Camp Edwards is located within Bourne and Sandwich. The land that comprises Camp Edwards is owned by the Commonwealth of Massachusetts and is in custody of the Massachusetts Division of Fish and Game (DFG)'s Division of Fisheries and Wildlife (DFW), which has leased the property to the Department of the U.S. Army. The Army, in turn, licensed the land to the MA ARNG for training. The current lease held by the Army expires in 2051. The MPMG Range therefore will be constructed on state-owned land that is leased to the Federal government. The MPMG Range is proposed at the site of the existing 600-yard KD Range which has a footprint of 38.5 acres (36 acres of managed grasslands and 2.5 acres of supporting range control area). The footprint of the MPMG Range is comprised of the existing KD Range and immature pitch pine, scrub oak, shrub land, pitch pine oak forest, and pitch pine scrub oak. The project site (and 98% of Camp Edwards) is located within Priority and/or Estimated Habitat as mapped by DFW's Natural Heritage and Endangered Species Program (NHESP).

Environmental Impacts and Mitigation

The project will alter 209 total acres of land, of which approximately 38.5 acres has been previously altered (KD Range), and will result in a "Take" of several state-listed rare species.

The project will reduce impervious area by 0.8 acres. Measures to avoid, minimize, and mitigate environmental impacts include: construction-period best management practices (BMPs), permanent preservation of 310 acres of forest, implementation of species-specific protection and monitoring plans, active habitat management activities, and construction of firebreaks and prescribed burnings to reduce the risk of wildfires.

Jurisdiction and Permitting

The MPMG Range project is undergoing MEPA review and required a NPC as directed in the July 16, 2001 Certificate on the FEIR. The project exceeds the mandatory EIR threshold at 301 CMR 11.03(1)(a) because it will result in the direct alteration of 50 or more acres of land (209 total acres). The project also exceeds ENF thresholds for land and state-listed rare species as specified in Sections 11.03(1)(b)(1) and 11.03(2)(b)(2) of the MEPA regulations. The project as proposed, while consistent with the uses envisioned in the Final EIR Master Plan, exceeds the “lowered thresholds” related to the clearing of two or more acres of vegetation and construction of new buildings and structures of more than 500 sf.

The project requires review by the Environmental Management Commission (EMC), which was established by Massachusetts Law (Chapter 47 of the Acts of 2002). It also requires a Conservation and Management Permit (CMP) from the Natural Heritage and Endangered Species Program (NHESP).

The project is being implemented by the MA ARNG as part of its training activities at MMR-Camp Edwards. Because this project is being undertaken by a State Agency, MEPA jurisdiction is broad and extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment as defined in the MEPA regulations.

Review of the Single Supplemental EIR

The Single Supplemental EIR was responsive to the Scope, which was narrow and limited to providing clarifications on land preservation, noise and groundwater monitoring, and construction period mitigation measures. The Single Supplemental EIR described the project and changes since the filing of the Expanded NPC, and described potential environmental impacts and mitigation measures.

The Single Supplemental EIR provided an updated greenhouse gas (GHG) analysis, a response to comments received on the Expanded NPC, and draft Section 61 Findings for use by NHESP, EMC, and MA ARNG. It provided a brief description of applicable statutory and regulatory standards and requirements, and described how the project will meet those standards. It included a list of required State Permits, Financial Assistance, or other State approvals and provided an update on the status of each of these pending actions. The Single Supplemental EIR clarified that the project is exempt from and does not require review by the U.S. Environmental Protection Agency (EPA) pursuant to the Sole Source Aquifer program.

The project has not changed significantly from what was previously described in the Expanded NPC. Project revisions are limited to the layout of the targets within the MPMG

Range. These revisions do not result in changes to the environmental impacts as previously disclosed in the Expanded NPC.

Comments from the Massachusetts Department of Environmental Protection (MassDEP) and the EMC state that the Proponent has adequately addressed the issues identified in their prior comment letters and do not identify any outstanding issues. Comments from the Cape Cod Commission (CCC) indicate that the mitigation package is consistent with various natural resources goals and purposes set out in the Cape Cod Regional Policy Plan and in the enabling legislation for the Reserve.

Rare Species

The Single Supplemental EIR indicated that the Proponent submitted the CMP application to NHESP in April 2020. Comments from the NHESP acknowledge the Proponent has and continues to work constructively with the agency to address rare species issues and permitting requirements and indicate the project will meet the necessary performance standards of a CMP. The Single Supplemental EIR acknowledged that long-term habitat management and monitoring of the Pine Barrens Focal Area (551 acres) and Grassland mitigation Area (36 acres) will be a condition of the CMP and is required in perpetuity. It clarified that these actions will be incorporated into the Integrated Natural Resource Management Plan (INRMP) as objectives and management projects, to be funded and implemented at a return interval and scope deemed sufficient by MA DFW and Camp Edwards to ensure compliance with the CMP and the required long-term net benefit for state-listed species. The INRMP is a requirement established by the Sikes Act Improvement Act (SAIA) of 1997, 16 USC § 670a *et seq.* As previously described in the Expanded NPC, the INRMP integrates all aspects of natural resources management within the rest of MA ARNG's mission, and is the primary tool for managing the ecosystems and habitats at Camp Edwards while ensuring the successful accomplishment of the military mission at the highest possible levels of efficiency. The most recent INRMP (2009) is currently being updated. As requested by the Scope, the Single Supplemental EIR provided an update on the timeframe for finalizing the INRMP. Formal stakeholder meetings and comment periods on the draft INRMP have been completed and review by Sikes Act partners is nearing completion. Agency reviews should be completed in summer 2020 and the INRMP is anticipated to be finalized by the end of the fiscal year. As noted above, commitments to preserve and manage forests and grasslands will be enforced and ensured in perpetuity through conditions in the CMP and the INRMP. The INRMP process requires annual meetings between all Sikes Act partners, including DFW, MA ARNG and the US Fish and Wildlife Service. These annual meetings will review the compliance and progress of the objectives established in the CMP.

As requested by the Scope, the Single Supplemental EIR clarified how the project will facilitate management of the scrub oak shrublands and frost bottom habitat located north of the KD Range. The Single Supplemental EIR clarified that this area is located within the Impact Area³, which precludes habitat management and fire management, resulting in the scrub oak shrubland area becoming overgrown. The extension of the two 1,500-m lanes and adjacent firebreaks into this habitat will allow for management and enhancement of the scrub oak shrubland habitat. Prescribed burns will be planned and implemented to improve open Pine

³ The Impact Area is formally designated as off-limits due to the potential presence of unexploded ordnance.

Barrens conditions for dependent species, including improvement of frost bottom. This will occur only after the unexploded ordnance has been removed. The Single Supplemental EIR also described how the 1,500-m lanes were sited and designed to reduce impacts to frost bottom habitat.

As previously described in the Expanded NPC, the CMP application describes a Camp Edwards-wide approach to mitigation that is intended to be used for future projects, in addition to the MPMG Range. The CMP application provided with the Single Supplemental EIR identified potential future projects that may draw upon the bank, including: gym expansion, transient troop headquarters, tango range expansion, sierra range expansion, and infantry squad battle course. I note these projects will require MEPA review if they meet/exceed a review threshold identified at 301 CMR 11.03 or one of the “lowered thresholds” as detailed in the Informational Supplement to the FEIR, dated August 15, 2001.

Greenhouse Gas (GHG) Emissions

The project is subject to the GHG Policy because it exceeds thresholds for a mandatory EIR. The Policy requires Proponents to quantify carbon dioxide (CO₂) emissions and identify measures to avoid, minimize or mitigate such emissions. Projects that alter over 50 acres of land are also required to analyze the carbon sequestration loss associated with permanent removal of trees and soil disturbance during the construction period. The Single Supplemental EIR identified a change to the construction phase which will reduce the amount of mobile source emissions generated during the construction period. Specifically, the project will reuse approximately 24,000 cubic yard (cy) of soil generated during construction of a transfer station by Eversource on an easement on Camp Edwards. This will reduce the need to truck in fill from off-site which will result in a reduction of construction hours by 2.4% which will reduce GHG emissions by an additional 3 tpy (from 897 tpy to 894 tpy). The updated GHG calculations reflecting this reduction of truck traffic are provided in the table below.

Activity	No Build (US tons)	Preferred Alternative (US tons)
Transportation	724	60
Construction	0	894
Range Operations	0.3	1.3
Land Clearing (Biomass Removal)	0	39,649
TOTAL CO₂ Emissions	724.3	40,604.3

As previously analyzed in the Expanded NPC, to mitigate for this impact, the project includes the preservation of 310 acres of forest and active management of 551 acres of forest. While these forested areas currently exist (i.e., the Proponent is not creating new forestland), the mitigation package offers the benefit of preserving these resources in perpetuity. The annual GHG sequestration and lifetime sequestration from these measures remains unchanged from that presented in the Expanded NPC. The Single Supplemental EIR reiterated that construction of the MPMG Range would represent 1.3% of the carbon sequestered in the total forests at Camp Edwards. The release of CO₂ from the project will be mitigated in 3.5 years based on just the annual GHG sequestration provided by the total forested land at Camp Edwards. The lifetime sequestration provided by the land preservation, forestry management MPMG-specific

mitigation activities will mitigate the project's GHG emissions and the one-time loss of carbon associated with land clearing.

Water Resources

The MPMG Range is located adjacent to land undergoing active remediation in accordance with the Impact Area Groundwater Study Program (IAGWSP). The Single Supplemental EIR indicated that the MA ARNG will coordinate with the IAGWSP to protect and/or relocate any existing groundwater quality monitoring wells currently located within the site. Construction and operation of the MPMG Range will be coordinated with the IAGWSP regarding their monitoring and treatment programs to ensure the remediation programs will continue without interruption during construction of the project. The Single Supplemental EIR also addressed how groundwater will be monitored to determine whether operation of the MPMG Range will impact the aquifer. The Operations, Maintenance, and Monitoring Plan (OMMP) for the range, required by the EPS, will include requirements for baseline and post-construction sampling to monitor soil and groundwater. If the monitoring identifies changes to groundwater quality beneath the MPMG Range, the MA ARNG will work with the EMC to identify the source/cause of the impact and appropriate measures and/or changes in practices to mitigate or address the impact. The location of the groundwater monitoring wells will be identified based on consultation with the IAGWSP, the EMC, and MassDEP. Comments from the CCC emphasize the importance of continued review and coordination with state and federal agencies to ensure that the MPMG Range will not interfere with ongoing site investigations and groundwater monitoring activities.

Noise

As previously described in the Expanded NPC, the United States Army Public Health Center (USAPHC) performed a Noise Assessment for the proposed MPMG Range in 2015 and in May of 2019 which concluded that there would be noise impacts to the community during range use. Based on these results, the location of the MPMG Range was shifted to the north to reduce noise within adjacent residential areas. The Single Supplemental EIR indicated a new noise study will be performed once the MPMG Range is operational to determine if additional mitigation measures are necessary. The construction of a wall or a berm will be considered as a mitigation strategy as necessary following the results of the new noise study. The Single Supplemental EIR acknowledged that construction activities are not exempt from 310 CMR 7.10 and confirmed construction activities will comply with Massachusetts Noise Regulations.

Construction Period

Construction of the project is anticipated to occur in a five year period from 2020 through 2025. The range is anticipated to become operational in 2023. Extension of the two lanes from 800-m to 1,500-m is anticipated to occur from 2022 through 2025. Work will occur Monday through Friday from 7:00 AM to 5:00 PM. The Single Supplemental EIR identified the construction period impacts of the project including truck traffic, air quality (dust), noise, and construction waste. Mitigation measures to address these impacts include: preparation of site-specific erosion and sedimentation control plan, implementation of stormwater management

BMPs, implementation of a dust control plan and suppression measures, installation of signage to ensure compliance with the Massachusetts Idling regulation at 310 CMR 7.11, and noise mitigation measures (described below). If oil and/or hazardous materials and/or unexploded ordnance are found during construction, the Proponent will notify MassDEP in accordance with the Massachusetts Contingency Plan (310 CMR 40.00). The project must comply with MassDEP Solid Waste and Air Pollution Control regulations during construction. All construction should be undertaken in compliance with the conditions of all State and local permits.

As requested by the Scope, the Single Supplemental EIR identified specific measures to address potential noise impacts. According to the Single Supplemental EIR, the MA ARNG will require the contractor to prepare and implement a noise-abatement plan and implement additional measures to reduce noise. Construction equipment and truck traffic routes will be located as far away from sensitive receptors as possible. The contractor will also be required to operate equipment in the quietest manner possible (e.g. speed restrictions, retarder brake restrictions, engine speed restrictions, etc.) and to shut down noise-generating heavy equipment when not needed. Additional noise reduction BMPs will be incorporated into construction contracts.

Mitigation and Section 61 Findings

The Single Supplemental EIR included draft Section 61 Findings for use by State Agencies. It described mitigation measures and contained commitments to implement mitigation. The draft Section 61 Findings will serve as the primary template for State Agency Permit conditions and should be revised, as necessary, in response to this Certificate, and provided to State Agencies to assist in the permitting process and issuance of final Section 61 Findings. The following measures have been proposed in accordance with the project to avoid, minimize, and mitigate environmental impacts:

Land Alteration

- Construction entrance vehicle mats or other methods to reduce off-site soil tracking;
- Implementation of site-specific Erosion and Sedimentation Control Plans, including monitoring or erosion-prevention measures and periodic visual inspections;
- Restoration of disturbed areas with native vegetation; and
- Preservation of land as open space or as habitat areas for rare species (described below).

Rare Species

- Preservation of 133 acres within Camp Edwards in perpetuity as open space through transfer of the land to DFW.⁴ The land is identified as the 133-acre Tract 5 located within the Towns of Falmouth, Bourne, and Sandwich along the JBCC southern boundary and abuts the Crane Wildlife Management Area;

⁴ The Expanded NPC indicated that this Land Transfer occurred in 2019 and that DFW has agreed to provide credit for the land.

- Preservation of 177 acres of land with management of vegetation for rare species, identified as a Forest Canopy Reserve Area within Camp Edwards;
- Preservation of 36 acres for grassland management for rare species, identified as a Grassland Mitigation Focal Area located in the Cantonment Area to optimize conditions for grassland species (Parcel H- Unit K);
- Active management (mechanical forestry and prescribed burns) of 551 acres of pine barren natural community, identified as Pine Barrens Mitigation Focal Areas;
- Implement wildland fire management recommendations outlined in the INRMP and Integrated Wildland Fire Management Plan (IWFMP), as applicable;
- Implementation of turtle sweeps before, during, and after the construction period to remove Eastern Box Turtles from the construction areas;
- Implementation of a NHESP-approved plan to protect state-listed turtle species during the construction phase of the project;
- Provide construction staff with information and materials about presence of state-listed species and appropriate responses to any sightings;
- Post-construction monitoring of Eastern Box Turtles and other species to assess the effectiveness of mitigation measures;
- Implementation of a long-term monitoring and management plan to maintain habitat quality within the pine barrens using the INRMP for guidance;
- Development and implementation of a Range Complex Master Plan; and
- Provision of funds for monitoring and research activities through 2025.

Water Resources

- Coordination with IAGWSP to ensure construction activities will not impact ongoing groundwater remediation program;
- Finalize MPMG Range OMMP which will include requirements for periodic soil and groundwater sampling and analysis to determine whether operation of the MPMG Range will impact the aquifer, and identification of additional measures and/or changes to operations to mitigate said impact if warranted based on monitoring results;
- Development and implementation of an emergency response plan in the event contamination is encountered during construction;
- Use of porta-potties through the construction and operational phase of the MPMG in accordance with the EPS; and
- Development and implementation of a construction-period refueling plan.

Greenhouse Gas Emissions

- Incorporation of conditions into construction contracts to include provisions for reducing air emissions such as use of equipment that complies with US EPA tier emissions limits;

- Preservation of land in perpetuity within Camp Edwards that is presently forested to provide ongoing annual sequestration;
- Replanting and restoration of the MPMG Range area with native grasses; and
- Commitment to provide a self-certification to the MEPA Office signed by an appropriate professional (e.g., engineer, architect, transportation planner, general contractor) indicating that all of the mitigation measures proposed in the Single Supplemental EIR (or their equivalent) have been completed.

Air Quality/Noise

- Implementation of a dust control plan that identifies dust suppression methods to be used during construction and dry weather training activities;
- Restricting vehicle speeds for land clearing equipment to 15 MPH on unpaved surfaces;
- Use of low volatile organic compounds (VOCs) supplies and equipment;
- Provide driver training, periodic inspection by site supervisors, and posting of signage to reduce idling in accordance with 310 CMR 7.11;
- Development and implementation of a Noise Abatement Plan;
- Completion of a follow-up Noise Study for the MPMG Range under full training (firing) conditions and implementation of additional noise mitigation measures (such as a wall or berm) if warranted based on study results;
- Implementation of noise notification and noise complaint protocols;
- Provide prior notification of upcoming training events, including the caliber activity;
- Locate construction equipment and truck routes as far from sensitive receptors as possible; and
- Shut down noise generating equipment when not in use and require operation of equipment in the quietest manner practicable.

Solid/Hazardous Waste

- Development and implementation of a Hazardous Waste Management Plan and Spill Prevention, Control, and Countermeasure (SPCC) Plan;
- Ensure all MA ARNG field staff are trained in spill response;
- Provide UXO safety and awareness training for all utility and construction personnel;
- Ensure all oil and hazardous waste used or generated is handled and disposed of in accordance with applicable state regulations and EPS
- Removal or abatement of regulated asbestos-containing material in accordance with the requirements of 310 CMR 7.00;
- Development of specific recovery plans for removal and proper disposition of spent projectiles, residues, and solid waste associated with the weapons, ammunition, target systems, and/or their operation and maintenance; and

- Recycling of ammunition projectiles (copper) when removed from the range during maintenance of the target and auxiliary berms.

Conclusion

Based on a review of the Single Supplemental EIR, comment letters and consultation with State Agencies, I find that the Single Supplemental EIR adequately and properly complies with MEPA and its implementing regulations. No further MEPA review is required. The project may proceed to permitting. The Proponent and State Agencies should forward copies of the final Section 61 Findings to the MEPA Office for publication in accordance with 301 CMR 11.12.

July 17, 2020
Date

K. Theoharides

Kathleen A. Theoharides

Comments received:

- 07/06/2020 Natural Heritage and Endangered Species Program (NHESP)
- 07/10/2020 Cape Cod Commission (CCC)
- 07/10/2020 The Environmental Management Commission (EMC)
- 07/10/2020 Massachusetts Department of Environmental Protection (MassDEP)

KAT/PRC/prc



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
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July 10, 2020

Secretary Kathleen A. Theoharides
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office, Ms. Tori Kim, Director
100 Cambridge Street, Suite 900
Boston, Massachusetts, 02114

Project Name: Multi-Purpose Machine Gun (MPMG) Range
Proponent: Massachusetts National Guard
Location: Camp Edwards, Joint Base Cape Cod, Massachusetts
Document: Single Environmental Impact Report (SEIR), Multi-Purpose Machine Gun (MPMG) Range at the Known Distance (KD) Range, Camp Edwards, Joint Base Cape Cod, Sandwich, Barnstable County, Massachusetts, EOEEA #5834, dated June 1, 2020

Dear Secretary Theoharides;

The Environmental Management Commission (EMC) was created within the Executive Office of Energy & Environmental Affairs (EOEEA) by Chapter 47 of the Acts of 2002 and Executive Order (EO) 433. The purpose of the EMC is to provide permanent protection of the drinking water supply and wildlife habitat of the Upper Cape Water Supply Reserve (the Reserve), created as public conservation land by Chapter 47 of the Acts of 2002, by oversight, monitoring and evaluation of all military and other activities on the Reserve to ensure they are consistent with this purpose. The Camp Edwards Training Ranges, which include the Known Distance (KD) Range and therefore the proposed Multi-Purpose Machine Gun (MPMG) Range, are co-located with and are within the Reserve.

The EMC finds that comments submitted by the EMC to the Executive Office of Energy and Environmental Affairs MEPA Office dated March 12, 2020 regarding the Notice of Project Change for the MPMG Range, EOEEA #5834, have been fully addressed in the SEIR. The EMC has no additional comments on the SEIR.

The EMC will review the Massachusetts Army National Guard (MAARNG) MPMG Operations, Maintenance and Monitoring Plan and Spill Prevention, Control and Countermeasure Plan for approval, and will coordinate with the MAARNG for review of the Integrated Natural Resources Management Plan and the Integrated Wildland Fire Management Plan. The EMC will continue to work closely with the MAARNG and their consultants, as well as

with the Department of Environmental Protection and the Division of Fisheries and Wildlife to provide guidance and compliance assistance with regard to environmental issues unique to the proposed MPMG Range and with regard to compliance with the EMC Environmental Performance Standards.

Thank you for the opportunity to provide comments on behalf of the EMC. If you have any questions regarding these comments, please contact me at 339-202-9487 or at 508-946-2871.

Sincerely,



Leonard J. Pinaud
Executive Director/Environmental Officer
Environmental Management Commission

Ec: Commissioner Amidon, Department of Fish and Game
Commissioner Suuberg, Department of Environmental Protection
Commissioner Montgomery, Department of Conservation and Recreation
Environmental Management Commission Science Advisory Council
Environmental Management Commission Community Advisory Council

Mr. Gary Moran, Deputy Commissioner, Department of Environmental Protection
Mr. Jason Zimmer, MassWildlife, Southeast Wildlife District
Mr. David Paulson, MassWildlife, Natural Heritage and Endangered Species Program
Ms. Page Czepiga, MEPA
Ms. Jane Dolan, USEPA Region 1

BG Christopher Faux, JBCC Executive Director
COL Matthew Porter, Commander, Camp Edwards
Mr Keith Driscoll, Massachusetts National Guard NEPA/MEPA Manager
Mr. Paulo A. Baganha, Massachusetts National Guard Environmental Program
Dr. Michael Ciaranca, Massachusetts National Guard Environmental & Readiness Center, Camp Edwards
Mr. Shawn Cody, National Guard Bureau Impact Area Groundwater Study Program



Commonwealth of Massachusetts
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July 10, 2020

Kathleen A. Theoharides
Secretary of Environment and Energy
Executive Office of Energy and
Environmental Affairs
100 Cambridge Street, Suite 900
ATTN: MEPA Office
Boston, MA 02114

RE: SEIR Review. EOEEA 5834
SANDWICH.Multi-Purpose Machine Gun
(MPMG) Range at Joint Base Cape Cod
(JBCC) Camp Edwards

Dear Secretary Theoharides,

The Southeast Regional Office of the Department of Environmental Protection (MassDEP) has reviewed the Single Environmental Impact Report (SEIR) for the Multi-Purpose Machine Gun (MPMG) Range at Joint Base Cape Cod (JBCC) Camp Edwards, Sandwich, Massachusetts (EOEEA #5834). The Project Proponent provides the following information for the Project:

The MPMG Range is proposed to be constructed at the existing location of a Known Distance (KD) Range (38.5 acres) which is located within mapped rare species habitat (see Figures 1.2 to 1.5). The KD Range was previously used for past ranges and training including disturbed areas that due to inactivity of the range are comprised of grassland habitat and immature pitch pine. The existing KD Range is not presently used for live fire training but is used for other training operations like unmanned aerial systems (UAS) training.

The proposed Project change consists of design plans for the MPMG Range proposed at the KD Range. This NPC is being submitted to satisfy the requirements of MEPA review to document a material change to a project. The MAARNG asserts that the MPMG Range project does not represent a significant change. As greater than 50 acres will be altered for this project, an Environmental Impact Report (EIR) will be required. We are requesting a Single EIR for this NPC. In addition, a Greenhouse Gas (GHG) Analysis is included in the NPC.

The Department's Comment

The Department is pleased to report that the Project Proponent has adequately addressed the issues raised by the Bureau of Water Resources, Air and Water, and Waste Site Cleanup. The Department, therefore, has no further comment.

Section 61 Findings

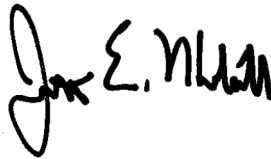
Pursuant to MEPA Regulations 301 CMR 11.12(5)(d), the Proponent has prepared Proposed Section 61 Findings and included them in the SEIR in a separate chapter updating and summarizing

proposed mitigation measures. In accordance with 301 CMR 11.07(6)(k), this chapter has also included separate updated Section 61 Findings for each State agency that will issue permits for the Project. The Section 61 Findings contain clear commitments to implement mitigation measures, estimates the individual costs of each proposed measure, identifies the parties responsible for implementation, and contains a schedule for implementation. The “Certificate of the Secretary of Energy and Environmental Affairs on the Final Environmental Impact Report (FEIR)” may indicate that this Project requires further MEPA review and the preparation of a Supplemental Final Environmental Impact Report (SFEIR)

Other Comments/Guidance

The MassDEP Southeast Regional Office appreciates the opportunity to comment on this SEIR. If you have any questions regarding these comments, please contact George Zoto at (508) 946-2820.

Very truly yours,



Jonathan E. Hobill,
Regional Engineer,
Bureau of Water Resources

JH/GZ

Cc: DEP/SERO

ATTN: Millie Garcia-Serrano, Regional Director
David Johnston, Deputy Regional Director, BWR
Gerard Martin, Deputy Regional Director, BWSC
Seth Pickering, Deputy Regional Director, BAW
Jennifer Viveiros, Deputy Regional Director, ADMIN
Dan Gilmore, Wetlands and Waterways, BWR
Leonard Pinaud, Chief, Federal Facilities, BWSC
Mark Dakers, Solid Waste, BAW
Alison Cochrane, Solid Waste, BAW
Allen Hemberger, Site Management, BWSC



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July 6, 2020

Kathleen A. Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
Page Czepiga, EEA No. 5834
100 Cambridge St.
Boston, Massachusetts 02114

Project Name: Multi-Purpose Machine Gun (MPMG) Range at the Known Distance (KD) Range
Proponent: Massachusetts Army National Guard
Location: Camp Edwards, Joint Base Cape Cod
Document Reviewed: Single Environmental Impact Report (SEIR)
EEA No.: 5834
NHESP No.: 18-37434

Dear Secretary Theoharides:

The Natural Heritage & Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife (the Division) has reviewed the SEIR for the proposed Multi-Purpose Machine Gun (MPMG) Range at the Known Distance (KD) Range and would like to offer the following comments regarding state-listed rare species and their habitats.

The Division has been in early coordination and consultation with the Proponent for the above referenced project. These discussions have been productive and the Division anticipates that the project will result in a “take” of multiple state-listed species.

Projects resulting in a Take of state-listed species may only be permitted if they meet the performance standards for a Conservation and Management Permit (CMP; 321 CMR 10.23). In order for a project to qualify for a CMP, the applicant must demonstrate that the project has avoided, minimized and mitigated impacts to state-listed species consistent with the following performance standards: (a) adequately assess alternatives to both temporary and permanent impacts to the state-listed species, (b) demonstrate that an insignificant portion of the local population will be impacted, and (c) develop and agree to carry out a conservation and management plan that provides a long-term net benefit to the conservation of the state-listed rare species.

The Applicant has consulted with the Division to avoid, minimize and mitigate impacts to state-listed species and their habitats associated with proposed project. They have submitted a CMP Application (dated 4/29/2020). Based on ongoing consultations with the Applicant and a review of the CMP Application, we understand that the proposed project will include the following measures in consideration of state-listed species concerns:

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- Habitat Preservation
- Habitat Management, Enhancements, and Creation
- Habitat and Species Monitoring

These measures are further detailed in Section 3.0 (Rare Species Impacts and Mitigation) of the SEIR. Although the CMP has not yet been finalized, based on a review of the CMP Application and ongoing coordination, the Division anticipates that the proposed project will meet the necessary performance standards of a CMP. In our view, the Applicant has and continues to work constructively with the Division to proactively address rare species issues and permitting requirements associated with this project.

Please note that the Division will not render a final decision until the Massachusetts Environmental Policy Act (MEPA) review process has been completed. We appreciate the opportunity to comment on this project. If you have any questions about this letter, please contact David Paulson, Senior Endangered Species Review Biologist, at (508) 389-6366 or david.paulson@state.ma.us.

Sincerely,



Everose Schlüter, Ph.D.
Assistant Director

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BARNSTABLE, MASSACHUSETTS 02630



CAPE COD
COMMISSION

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Via Email

July 10, 2020

Kathleen A. Theoharides, Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office, Page Czepiga, Assistant Director
100 Cambridge Street, Suite 900, Boston, MA 02114

Re: Single Environmental Impact Report - Multi-Purpose Machine Gun (MPMG) Range at the Known Distance (KD) Range, JBCC/ Camp Edwards, Sandwich, MA (EEA No. 5834)

Dear Secretary Theoharides:

Thank you for the opportunity to provide comments on the above-referenced SEIR submitted by the Massachusetts Army National Guard (MAARNG). Cape Cod Commission staff has worked with Joint Base Cape Cod (JBCC) in the past on master planning and as a participant on community working groups and advisory councils, and looks forward to continued representation and participation in such capacities. Commission staff supports MAARNG's efforts to mitigate the impacts of this project and to coordinate with appropriate agencies through all phases of development.

MAARNG has proposed mitigation for the Project as described in the SEIR, primarily through a Conservation and Management Permit (CMP) to be approved by the Natural Heritage and Endangered Species Program (NHESP). Commission staff suggests that the mitigation actions proposed as part of the CMP—a combination of land transfers, habitat management, monitoring and research, and establishment of a mitigation bank—are consistent with various natural resources goals and purposes set out in the Cape Cod Regional Policy Plan and in the enabling legislation for the Reserve. While protection of rare species may also protect the water supply and open space, the MAARNG should ensure that protection of these resources is addressed directly as well. Because these mitigation actions will need to be appropriately monitored and tracked to confirm their benefit and effectiveness, Commission staff supports the requirement for annual meetings between MAARNG and MADFW to review the implementation of development projects and mitigation actions and to serve as an audit of overall CMP compliance.

Commission staff encourages MAARNG to continue to coordinate its activities with the Environmental Management Commission, Impact Area Groundwater Study Program, Massachusetts Department of Environmental Protection, and United States Environmental Protection Agency. Any clearing or development activities of the scale proposed by this project in a water supply area could negatively impact underlying water and natural resources. Continued review and coordination with these agencies will ensure that environmental performance standards and protections are in place during all phases of development (i.e. Construction Management Plan, Range Management Plan, Operation, Maintenance

and Monitoring Plan, and Standard Operating Procedure) and that proposed MPMG range construction and operation do not interfere with ongoing site investigations, restorations, and monitoring activities.

Commission staff are available to discuss any questions you might have about this letter.

Sincerely,



Kristy Senatori
Executive Director

Cc: Project File
Keith Driscoll, MAARNG, via email
Bud Dunham, Town Manager, Sandwich via email
Cape Cod Commission Chair via email
Cape Cod Commission Committee on Planning and Regulation Chair via email