

April 26, 2022

Attorney General Maura Healey

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Sent by email only.

Ref: Proposed Multi-Purpose Machine Gun Range Project on the Upper Cape Water Supply Reserve at Camp Edwards, Joint Base Cape Cod

Dear Attorney General Healey:

As you prepare to represent the constituents of Commonwealth of Massachusetts as Governor, a coalition of environmental, faith, civic and climate justice groups representing thousands of constituents in the Cape Cod region, bring to your attention our unified opposition to the proposed 8-lane, multi-purpose machine gun range proposed by the Massachusetts National Guard on the Upper Cape Water Supply Reserve at Camp Edwards, Joint Base Cape Cod (JBCC).

Our coalition opposes this plan because it violates the state statutes to permanently conserve the area for water and natural habitat protection. The outcome of this project would be a threat to public health and to our water supplies which are provided by a sole source aquifer. It would endanger significant habitats and rare species, and adversely impact regional carbon sequestration efforts.

As Governor, you will have the power to stop this project, which is inconsistent with environmental protection and promotion of our community well-being, from moving forward.

We urge you to pledge to stop the project if you are elected, and even in your present capacity. We also urge you to communicate your opposition to the state's [Environmental Management Commission \(EMC\)](#), [the EMC 's Community Advisory Committee \(CAC\)](#) and [the Science Advisory Committee \(SAC\)](#).

To build the proposed range, more than 170 acres of rare pine barren forest would be clear-cut to make way for six 800-meter-long firing lanes and an additional two 1,500-meter middle lanes to accommodate the use of the .50 caliber M82 sniper rifle and M2 machine gun. The range would consist of firing positions, targetry, support structures, and ancillary roads; and a 5,000-acre Surface Danger Zone (SDZ), where projectiles fired on the range would land based on the types of weapons and ammunition used.

Under Chapter 47 of the Acts of 2002 which established the Upper Cape Water Supply Reserve, the 15,000-acre northern training area of Joint Base Cape Cod was set aside as public conservation land dedicated to three purposes:

1. Water supply and wildlife habitat protection;
2. Development and construction of public water supply systems; and
3. Use and training of the military forces of the Commonwealth, provided that such military use and training is compatible with the natural resources purposes of water supply and wildlife habitat protection.

The machine gun range fails to satisfy the definition of "compatible military training" required under the establishment of the Upper Cape Water Supply Reserve. The proposed project is, in our opinion, one of convenience and not necessity.

Given the magnitude of the project and the potential for health and environmental risks, our coalition has repeatedly called for an Environmental Impact Statement to be conducted.

Currently, the E.P.A. is investigating whether the proposed range could create a significant public health hazard by contaminating the drinking water that runs beneath the base. The findings of the investigation will be compiled in a draft report known as a Sole Source Aquifer Determination to be released this fall. Once released, a 30-day public comment period will begin.

We note that our state elected officials, Senator Julian Cyr, Senator Susan Moran and Representative Dylan Fernandes, oppose this project. Our federal delegation, Senator Markey, Senator Warren and Representative Keating, have expressed their opposition as well.

The attached Executive Summary provides further detail related to our opposition to the proposed gun range. We will be happy to speak with you more about this issue, and look forward to your response.

Respectfully,

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cc: Senator Ed Markey
Senator Elizabeth Warren
U.S. Congressman Bill Keating
MA State Senator Julian Cyr
MA State Senator Susan Moran
MA Rep. Dylan Fernandes

EXECUTIVE SUMMARY
Opposition to Proposed Multi-Purpose Machine Gun Training Range
at Camp Edwards, Joint Base Cape Cod
Prepared by Anti-JBCC Gun Range Coalition Members
Submitted April 26, 2022

Following is detailed information on the Cape Cod Coalition's reasons for opposing JBCC's proposed Multi-Purpose Machine Gun Range project:

Inconsistency with the Purpose of the Upper Cape Water Supply (UCWS)

Under Chapter 47 of the Acts of 2002, the 15,000-acre, northern training area was set aside as public conservation land dedicated to three purposes:

1. water supply and wildlife habitat protection;
2. the development and construction of public water supply systems; and
3. the use and training of the military forces of the Commonwealth, provided that such military use and training is compatible with the natural resource purposes of water supply and wildlife habitat protection.

The UCWS supplies drinking water to more than 130,000 residents of Bourne, Falmouth, Mashpee, Sandwich, and Barnstable, and feeds the sole source aquifer that supplies drinking water to all Upper Cape communities. The proposed machine gun range poses needless risk of contamination to this critical watershed, and any project involving the potential migration of metals and chemicals as well as the deforestation which could ultimately further degrade our water supply.

Lack of necessity / Failure to Consider Alternative Uses

The expressed reason to site the Machine Gun Range at Joint Base Cape Cod is to reduce inconvenience to National Guard personnel by reducing travel times to New York or Vermont training sites. We question whether there is a justifiable need to expand the existing training range, and whether the \$11.5 million taxpayer dollars could be better spent on solutions that present fewer risks to the environment and the community. Moreover, the Environmental Assessment failed to analyze, as an alternative site in Massachusetts, [the nearly \\$8 million gun range to be built at Ft. Devens in Ayer.](#)

We are convinced that a proposal to locate a machine gun range along the Quabbin Reservoir, or on any other fragile watershed in Massachusetts dedicated to drinking water protection, would not be tolerated. The inconvenience to troops pales in comparison to the potential detrimental effects imposed on 130,000 Upper Cape year-round residents and an estimated 5.3 million annual summer visitors to Cape Cod, many of whom rely on clean water drawn from the Upper Cape's sole source aquifer.

History/Current Pollution from the Joint Base

The legacy of toxic pollution at the Joint Base is well known, well-documented and remains

substantially unresolved. Nine areas of the JBCC are still listed as Superfund sites. Elevated cancer rates on the Upper Cape were also investigated, possibly linked to toxic pollution. According to the official website of the Joint Base Cape Cod:

[“The Installation Restoration Program”](#) began in the early 1980s investigating and then cleaning up source areas and groundwater contamination at Joint Base Cape Cod (JBCC). The Base was listed on the Superfund National Priorities List in 1989. The Air Force Civil Engineer Center (AFCEC) assumed managerial control from the Air National Guard in 1996... There are over 100 locations on JBCC that have been evaluated as part of the Air Force cleanup efforts. Many of those locations were confirmed as source areas that contributed to soil and/or groundwater contamination at some point in the past and over 70 have been cleaned up. Sixty-one source areas have been delisted as Superfund sites. Several potential source areas are being investigated under the Military Munitions Response Program and for emerging contaminants which were recently added to the AFCEC program.”

To this day, several new potential source areas of contamination and new contaminants continue to be investigated under the Military Munitions Response Program; and the 2019 Joint Base CC Cleanup Update lists 11 new contamination sites. The JBCC’s assurances of impeccable environmental stewardship are undermined by the presence of these un-remediated sites and inadequate proposals for mitigating or off-setting potential environmental effects, such as forest management and tree-planting at alternate sites. When considered against a backdrop of reports of brain, breast, liver, and other cancer clusters in Upper Cape towns (also possibly linked to the Joint Base activities), the public has strong reason to question the safety of the project and conclude that the past is likely to be repeated.

Lack of Analysis, Transparency, and Public Engagement

The proposal to site a machine gun range at JBCC received Pentagon approval in 2012, virtually unbeknownst to Upper Cape residents. In 2015, \$11.5 Million was allocated for the project on Camp Edwards, again without the knowledge of most Upper Cape residents. The project was finally brought to public attention with a small announcement in [The Cape Cod Times](#) on August 8, 2020, eight years after the project was approved by the Pentagon. Though the proposal did indeed pass through the various stages of review as required by the Commonwealth, members of the public were largely left out.

The Environmental Assessment (EA) conducted by the Army Guard provided insufficient analysis of the likely impacts resulting from this project. According to the August 8, 2020 public announcement, “This EA evaluates the potential environmental, cultural, and socioeconomic effects of establishing a new Multi-Purpose Machine Gun (MPMG) Range at Camp Edwards, Joint Base Cape Cod in Barnstable County, Massachusetts.”

This commitment was not met, nor was the charge completed. No evidence exists that JBCC personnel undertook a comprehensive evaluation of the “potential environmental, cultural, and socioeconomic effects” of this project.

Additionally, local, state, and federal government officials should have known that this proposal would generate public concern. Failure to enlist feedback from the public until August 8, 2020 severely limited transparency and community engagement. Once public awareness of the project grew among citizen stakeholders, opposition has been fierce and widespread:

- During the 30-day period ending on September 7, 2020 more than 900 public comments were filed, the vast majority of which were opposed, which provides evidence that the proposal is of deep concern to Cape residents. The Environmental Assessment’s “Finding of No Significant Impact (FONSI)” and “No Significant Controversy” conclusions failed to account for these concerns.
- Nearly 2,500 Cape Cod residents have signed a [petition](#) to the Environmental Management Commission and Massachusetts state and federal elected officials opposing this project.
- Over 200 Cape Cod citizens – from Provincetown to Falmouth – attended a virtual meeting of the Environmental Management Commission’s Science Advisory Council, with the vast majority speaking in opposition to the project.

Failure to Consider Climate Impacts

Faced with the existential crisis of climate change, we should be using every tool in the toolbox to dramatically reduce our carbon emissions in the next decade. Yet, the project proposes to clear cut 170 acres of mature trees, losing existing future near-term carbon sequestration values and other ecological and water protection services offered by the trees. This climate impact was not quantified in the EA. The massive removal would also impede the Commonwealth’s net zero GHG emissions goals by 2050.

The JBCC’s pledge to replant juvenile trees on existing conservation land provides an inadequate remedy. It relies on planting on existing conservation land, providing little or no net gain in carbon sequestration. Moreover, decades will pass before the newly planted trees provide the mitigation functionality of the existing trees. Given climate emergency realities and recent federal and state mandates, an environmental impact study should fully examine climate emergency mitigation impacts of the deforestation of more than 170 acres of wooded land over the next ten years.

Environmental Justice / Moral Imperative

The proposal, if approved, would subject people (as well as wildlife) in neighboring communities to increased noise, traffic, air pollution, risk of contaminated drinking water, and loss of residential property value. These impacts would fall hardest on those with compromised health, inadequate housing, and lack of access to quality health care. Most impacted may be our children who are most vulnerable to toxic pollution and young adults who are already experiencing epidemic levels of anxiety. We provide two examples below:

1) The Forestdale School in Sandwich is within sound range of the proposed machine gun range. This means that elementary school age children will be exposed to constant sounds

of gunfire. Though the full impacts are not known, there is evidence from existing research that exposure to routine shooting normalizes the sound of guns, desensitizes individual response to gun violence, and can be tied to increased emotional anxiety. At a time when gun policy is being scrutinized due to mass shootings in schools in the United States, the oversight of the impact of the proposed machine gun range on children needs to be addressed by inclusion in a more holistic assessment of the proposal.

2) The Massachusetts National Cemetery is adjacent to the proposed machine gun range and is the burial site for more than 46,000 veterans. The irony in the machine gun range proposal is that the constant sound from the range would disturb the peace attribution related to honoring the dead, in this case veterans who died in service to our nation. Cemeteries are typically quiet and green to offer opportunity for quiet reflection.

Given the climate emergency and recent federal and state mandates, the proposed gun range should be stopped, or a comprehensive environmental impact study should fully examine the impacts of the deforestation of more than 170 acres of wooded land over the next ten years, as well as the potential harm to human health, wildlife and Cape Cod's fragile ecosystems.

Coalition Against the Proposed Machine Gun Range at JBCC

350 Cape Cod

Association to Preserve Cape Cod

Brewster Conservation Trust

Buzzards Bay Coalition

Cape Cod Climate Change Collaborative

Cape Cod Group, Sierra Club

Citizens Climate Lobby South Shore and Cape Cod Chapter

Coalition for Social Justice

Compact of Cape Cod Conservation Trusts

Faith Communities Environmental Network

Falmouth Climate Action Network (FalCAN)

Harwich Conservation Trust

League of Women Voters Cape Cod Area

League of Women Voters Falmouth, Natural Resources Committee

Lower Cape Indivisible

Massachusetts Chapter, Sierra Club

Orenda Wildlife Land Trust

Sustainable Practices