

**FINDING OF NO SIGNIFICANT IMPACT (FNSI)**  
**MASSACHUSETTS ARMY NATIONAL GUARD**  
**PROPOSED CONSTRUCTION AND OPERATION OF A MULTI-PURPOSE MACHINE GUN**  
**RANGE**  
**CAMP EDWARDS, JOINT BASE CAPE COD**  
**BARNSTABLE COUNTY, MASSACHUSETTS**

**1. Introduction**

The Massachusetts Army National Guard (MAARNG) prepared an Environmental Assessment (EA) to identify and evaluate potential environmental effects from the proposed construction of a new Multi-Purpose Machine Gun (MPMG) Range at Camp Edwards, which is situated within Joint Base Cape Cod in Barnstable County, Massachusetts. This EA has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA; 42 United States Code [USC] 4321 et seq.), the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and 32 CFR Part 651, *Environmental Analysis of Army Actions*. As set forth in 10 USC §10501 and in Department of Defense (DoD) Directive 5105.77, *National Guard Bureau (NGB)*, the NGB is a Joint Activity of the DoD and, as a Federal agency, must comply with the NEPA.

**2. Description of the Proposed Action and Alternatives**

**Proposed Action.** The Proposed Action includes the construction and operation of an eight lane MPMG Range. Six lanes would be 800 meters long with a width of 25 meters at the firing line; widening to 100 meters at a distance of 800 meters. The two middle lanes would extend an additional 700 meters to a distance of 1,500 meters long to accommodate the use of the .50 caliber M82 sniper rifle and M2 machine gun. The range would include two primary components: (1) the physical range footprint, consisting of the firing positions, targetry, support structures, and associated facilities; and (2) the Surface Danger Zones (SDZs), the area where projectiles fired on the range would land based on the types of weapons and ammunition used. The MAARNG would only use copper ammunition at the proposed MPMG Range, and ammunition impacting the SDZ would be significantly reduced by range design elements to capture and contain fired rounds within the range.

The physical range footprint would consist of firing positions and lanes, targetry, and support structures. Construction activities would include up to 199.0 acres of disturbance and would require up to 170.5 acres of tree clearance to accommodate the range footprint, small arms range operations and control area facilities, utility extensions, access and maintenance road development, and firebreaks to reduce wildfire hazards from tracers. Approximately 5,197 acres would be required for the MPMG Range to accommodate the SDZs associated with the proposed weapons and ammunition. An SDZ is a mathematically predicted area where a projectile could impact upon return to earth, either by direct fire or ricochet. As the SDZ at Camp Edwards is contained entirely within Joint Base Cape Cod (JBCC), there would be no on- or off-post public safety risk from training activities at the new MPMG range.

The MPMG Range would be available for all MAARNG units as well as other DoD organizations as scheduling permits. Under the Proposed Action, it is anticipated that Camp Edwards site usage could increase by up to 18.6 percent (or by up to 17,650 soldier-days) as a result of military personnel utilizing the MPMG Range.

The purpose of the Proposed Action is to provide the requisite range and training facilities at Camp Edwards to allow the MAARNG to efficiently attain small arms training and weapons qualifications requirements within Massachusetts. The MPMG Range would provide soldiers and their units the necessary modernized training capabilities to be effective in contemporary and future operating environments while meeting mission training objectives. The Proposed Action is needed to: 1) address shortfalls in required small arms

training facilities and capabilities within Massachusetts, 2) allow multiple units to attain required weapons qualification levels simultaneously and efficiently, and 3) support the MAARNG's and other military users' Federal and State missions.

An Army National Guard MPMG Range does not currently exist within Massachusetts. To receive training on an MPMG Range and meet weapons qualifications standards and training requirements as set forth under Department of the Army (DA) Pamphlet (PAM) 350-38, *Standards in Weapons Training*, soldiers and units must travel to a nearby MPMG range, with the closest being Camp Ethan Allen in Jericho, Vermont, approximately 270 miles away. The need for travel causes the loss of critical training resources MAARNG units need and reduces the time available for conducting required training exercises at Camp Edwards. Implementation of the Proposed Action would support higher quality, mission-essential training activities at Camp Edwards, while limiting the need for out-of-state travel.

**Alternatives Considered.** NEPA, CEQ regulations, and 32 CFR Part 651 require all reasonable alternatives to be explored and objectively evaluated. Alternatives that are eliminated from detailed study must be identified along with a brief discussion of the reasons for eliminating them. For purposes of analysis, an alternative was considered "reasonable" only if it would enable the MAARNG to accomplish the primary mission of providing land, facilities, and resources at Camp Edwards and to meet the purpose of and need for the Proposed Action. Alternatives that would not enable the MAARNG to meet the purpose of and need for the Proposed Action were dismissed from further analysis. These include: 1) use a training site at another installation; 2) use an undisturbed area at Camp Edwards; 3) use a different existing range at Camp Edwards; 4) implement a standard-size MPMG range; and 5) use an alternate location 100 meters south of the Proposed Action.

The EA examines three alternatives in-depth, the Preferred Action Alternative, which would carry out the Proposed Action; the Reduced-Scale Alternative, which would carry out a modified, smaller version of the Proposed Action; and the No Action Alternative, which would not carry out the Proposed Action but is carried forward to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required in CEQ Regulations (40 CFR §1502.14). Currently, Military Construction (MILCON) funding has not been appropriated for the implementation of the Preferred Action Alternative. At the time of programming the MPMG MILCON funding request, the MAARNG did not include a provision for the additional M2 (.50 caliber) lanes. As such, the additional features associated with this alternative (e.g., extension of the two middle lanes from 800 feet to 1,500 feet) are not currently funded. These additional features would need to be constructed at a later date.

### **3. Environmental Analysis**

The potential environmental impacts associated with the Proposed Action are fully described in the EA. The EA identifies the environmental resources that could be affected by the Proposed Action, and determines the significance of the impacts, if any, to each of these resources. Based on the EA's analysis, the MAARNG determined that the known and potential adverse impacts from the Proposed Action would be less than significant on land use and cover, air quality and climate, noise, soils, groundwater, biological resources, infrastructure, and hazardous and toxic materials and wastes. The implementation of Best Management Practices (BMPs) and Regulatory Compliance Measures specified in the **Section 4.11** of the EA, such as establishing a Noise Notification Protocol and implementing a 24-hour noise complaint point of contact, would further avoid or reduce less-than-significant impacts. In addition, all ranges at Camp Edwards have Operations, Maintenance, and Monitoring Plans (OMMP) that are reviewed regularly to ensure all range use and maintenance is compliant with the Environmental Performance Standards established under Chapter 47 the Acts of 2002 (M.G.L.) to protect water supply resources and wildlife habitat protection in the Upper Cape Water Supply Reserve. Camp Edwards has also obtained a Conservation & Management Permit (CMP) from the state's Natural Heritage and Endangered Species Program, and will comply with permit conditions to further ensure no significant adverse impacts on biological resources. Regional air

quality may experience long-term beneficial impacts. The Proposed Action would have no effect on cultural resources.

#### **4. Mitigation**

Under the Preferred and Reduced-Scale Alternatives, no significant adverse environmental impacts would be anticipated; therefore, no mitigation measures are required to reduce site specific adverse environmental impacts to below significant levels.

#### **5. Regulations**

The Proposed Action would not violate NEPA, the CEQ Regulations, 32 CFR Part 651, or other Federal, state (including the Massachusetts Environmental Policy Act), or local environmental regulations.

#### **6. Commitment to Implementation**

The NGB and the MAARNG affirm their commitment to implement this EA in accordance with NEPA. Implementation is dependent on funding, and this project will be a Military Construction funded project. The MAARNG and the NGB will ensure that adequate funds are provided to achieve the goals and objectives set forth in this EA.

#### **7. Public Review and Comment**

The MAARNG solicited public comments on the Final EA and Draft FNSI during a 30-day public review period between 8 August 2020 and 7 September 2020. The general public, government agencies, and other stakeholders were notified of the opportunity to comment on the Final EA and Draft FNSI via a Notice of Availability published in the *Cape Cod Times* on 8 August 2020. Copies of the Final EA and Draft FNSI were made available for public review online at <https://www.massnationalguard.org/ERC/publications.htm>.

During the 30-day public comment period, the MAARNG received a total of 367 individual comments from 352 commenters. Comments were further broken out into specific sub-comments and cataloged according to their main topic of concern to ensure all comments received a complete and accurate response. Using this method, the MAARNG identified 916 sub-comments from the 367 individual comments received.

All comments received thorough subject matter expert and legal review. No comments were found to identify specific impacts that were not already sufficiently addressed through the NEPA process and supporting analysis. All public comments received, and MAARNG's corresponding responses, are set forth in the attached ***Public Comment Summary Report for the Multi-Purpose Machine Gun (MPMG) Range at the Known Distance (KD) Range Environmental Assessment (EA)***.

#### **8. Finding of No Significant Impact**

After careful review of the EA and the public comments received by the MAARNG, I have concluded that implementation of the Proposed Action would not have a significant impact on the quality of the human or natural environment. Per 32 CFR Part 651, the Final EA and draft FNSI were made available for a 30-day public review and comment period. The MAARNG and NGB have reviewed and provided written responses to all comments received on the Final EA and Draft FNSI, and have determined that there were no comments that warranted revisions to the Final EA. Therefore, a FNSI is appropriate and the Proposed Action will be implemented. This analysis fulfills the requirements of NEPA and the CEQ Regulations. An Environmental Impact Statement will not be prepared, and the NGB is issuing this FNSI.

30 April 2021

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Date

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