

Appendix A - Agency Correspondence and Native American Consultation

Table of Contents

Agency Letters	A-2
Native American Consultation Letters	A-110
Massachusetts Natural Heritage and Endangered Species Program Response (16 August 2019)	A-127
US Environmental Protection Agency Response (5 September 2019)	A-130
Massachusetts Department of Conservation and Recreation Response (10 September 2019)	A-133
Environmental Management Commission Response (13 September 2019)	A-134
Memorandum for Record: SHPO Consultation.....	A 138
Memorandum for Record: Native American Consultation.....	A 139
Record of Agency Coordination and Meetings	A-140



DEPARTMENTS OF THE ARMY AND THE AIR FORCE
JOINT FORCE HEADQUARTERS
MASSACHUSETTS NATIONAL GUARD
OFFICE OF THE ADJUTANT GENERAL
2 RANDOLPH ROAD
HANSCOM AFB, MA 01731-3001

7 August 2019

Cape Cod Commission
P.O. Box 226
Barnstable, MA 02630
Attn: Kristy Senatori, Executive Director
Attn: Jonathan Idman, Chief Regulatory Officer

RE: Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) for the Environmental Assessment (EA) for the Multi-Purpose Machine Gun Range, Camp Edwards, Massachusetts

Dear Ms. Senatori and Mr. Idman:

The Massachusetts Army National Guard (MAARNG) is preparing environmental documentation for the proposed construction and operation of a Multi-Purpose Machine Gun Range (MPMG) at Camp Edwards, Massachusetts (**Figure 1**).

Construction of a MPMG Range will provide MAARNG soldiers a modernized small arms training venue to efficiently accomplish mission training to include weapons qualification requirements in a manner that protects both human health and the environment.

The proposed improvements would occur at the existing Known Distance (KD) Range. The KD Range is one of the small arms ranges within Camp Edwards Training Site as shown on **Figure 2**. The parcel is currently leased from the Commonwealth of Massachusetts by the Department of the Army, which in turn licenses the land to the MAARNG.

This project entails the siting and development of range specific engineered structures such as enhanced soil berms behind each target to accomplish to the maximum extent practicable metal recovery and recycling, prevention of fragmentation and ricochets, and prevention of sub-surface percolation of residue associated with the range operations.

The project proposal includes a process for selection of pollution prevention strategies and best management practices through the joint coordinated review efforts of the Environmental Management Commission, the United States Environmental Protection Agency and the Massachusetts Department of Environmental Protection.

An Environmental Assessment (EA) is being prepared under the provisions of, and in accordance with, the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 *et seq.*), the Council of Environmental Quality [CEQ] Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), 32 CFR 651 (*Environmental Effects of Army Actions*) and the National Guard Bureau (NGB) *NEPA Handbook – Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with National Environmental Policy Act of 1969*.

This EA provides a full comparative analysis of the following three alternatives:

- **Alternative 1: Preferred Project Alternative** – This alternative will implement the proposed project by constructing an eight lane MPMG Range at the existing KD Range. The range footprint would consist of eight 800 meters long lanes with a width of 25 meters at the firing line to a width of 100 meters at a distance of 800 meters. The two middle lanes (Lanes 5 and 6) will be an additional 700 meters in length extending to a total overall distance of 1,500 meters for future .50 caliber usage. The extension of the .50 caliber lanes will be constructed at a future date. To accommodate the MPMG range footprint approximately 97 acres of additional ground disturbance/tree clearing is required.
- **Alternative 2: Southerly Location Alternative** – This alternative would implement the Proposed Action at a more southerly location at the KD Range. The construction would fulfill the assigned mission requirements but would result in greater impacts, specifically with noise.
- **Alternative 3: No-Action Alternative** – This alternative would not implement the Proposed Action and would allow the existing training and operations to continue without an MPMG Range. Units would travel to either New York, New Jersey, or Vermont to qualify on the nearest MPMG Range.

The MAARNG is currently identifying environmental resources, issues, and constraints associated with the proposed project area, as identified above, in order to effectively assess potential environmental impacts associated with the proposed action. The MAARNG is requesting baseline information regarding any concern that your Agency may have as related to the potential environmental issues at, or in the vicinity of, the proposed action. Any information your Agency can, or would like to, provide about the vicinity of the sites would be appreciated.

If you are aware of other individuals, organizations, or resource agencies that may have additional environmental information or other pertinent knowledge that may assist us in preparing the EA, please contact us or forward this letter for their review, and include any returned comments with your response. **Attachment 1** provides a list of agencies/offices with which consultation has been initiated.

We look forward to your participation in this NEPA review process. Your response on or before 6 September 2019 will enable us to complete this phase of the project within the scheduled time frame.

If you have any questions concerning this request, please do not hesitate to contact myself or our consultant, Kathryn Barnicle at AECOM at 508-833-6953 or the mailing address listed below. If preferable, you may e-mail your response to kathryn.barnicle@aecom.com.

Sincerely,



Keith J. Driscoll
 NEPA/MEPA Manager
 Massachusetts National Guard
Keith.j.driscoll.nfg@mail.mil
 339-202-3980

Please send responses to:

Kathryn Barnicle
 AECOM
 9 Jonathan Bourne Drive
 Pocasset, MA 02559
Kathryn.barnicle@aecom.com
 508-833-6953

Camp Edwards and Joint Base Cape Cod Barnstable County, Massachusetts

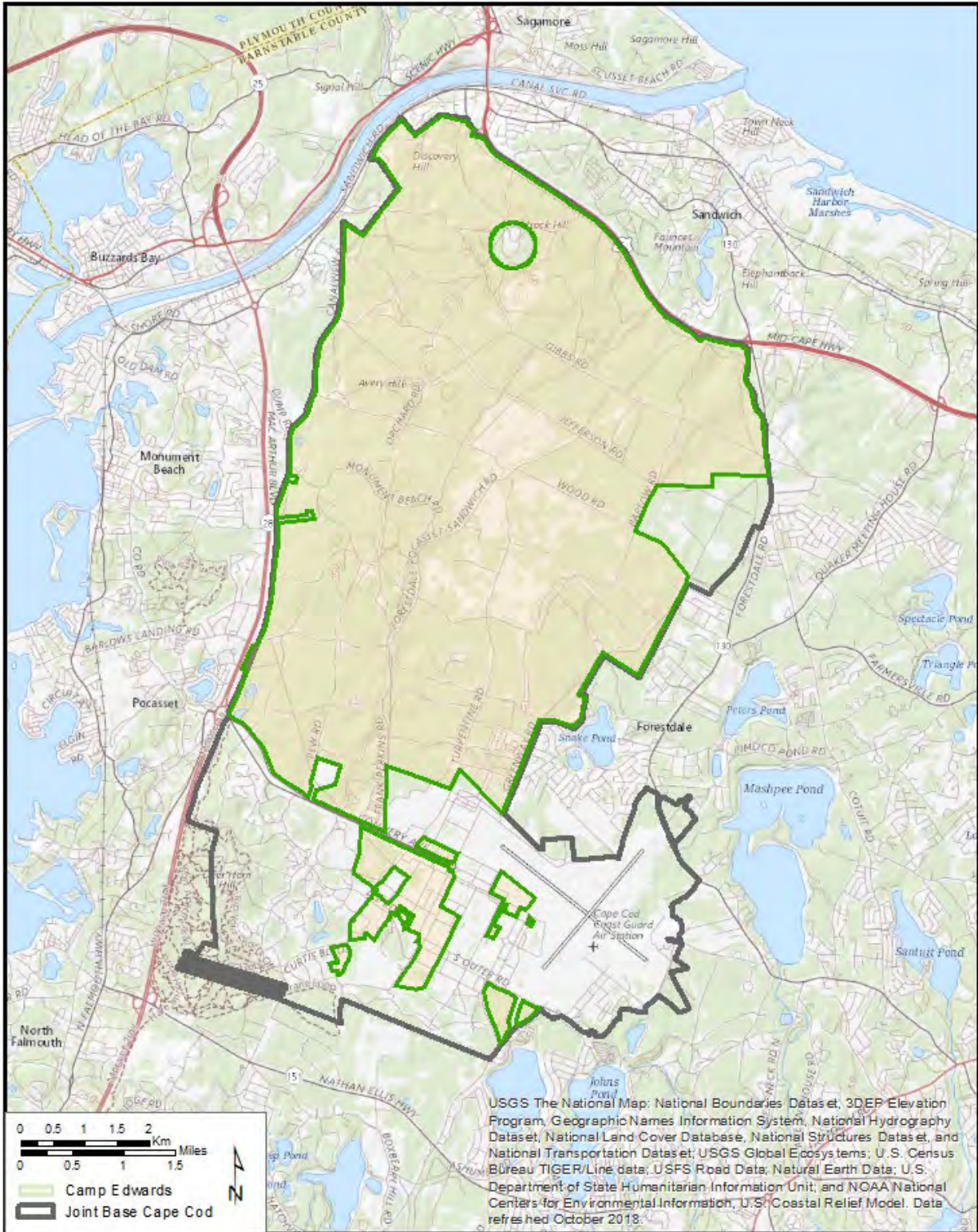


FIGURE 1.

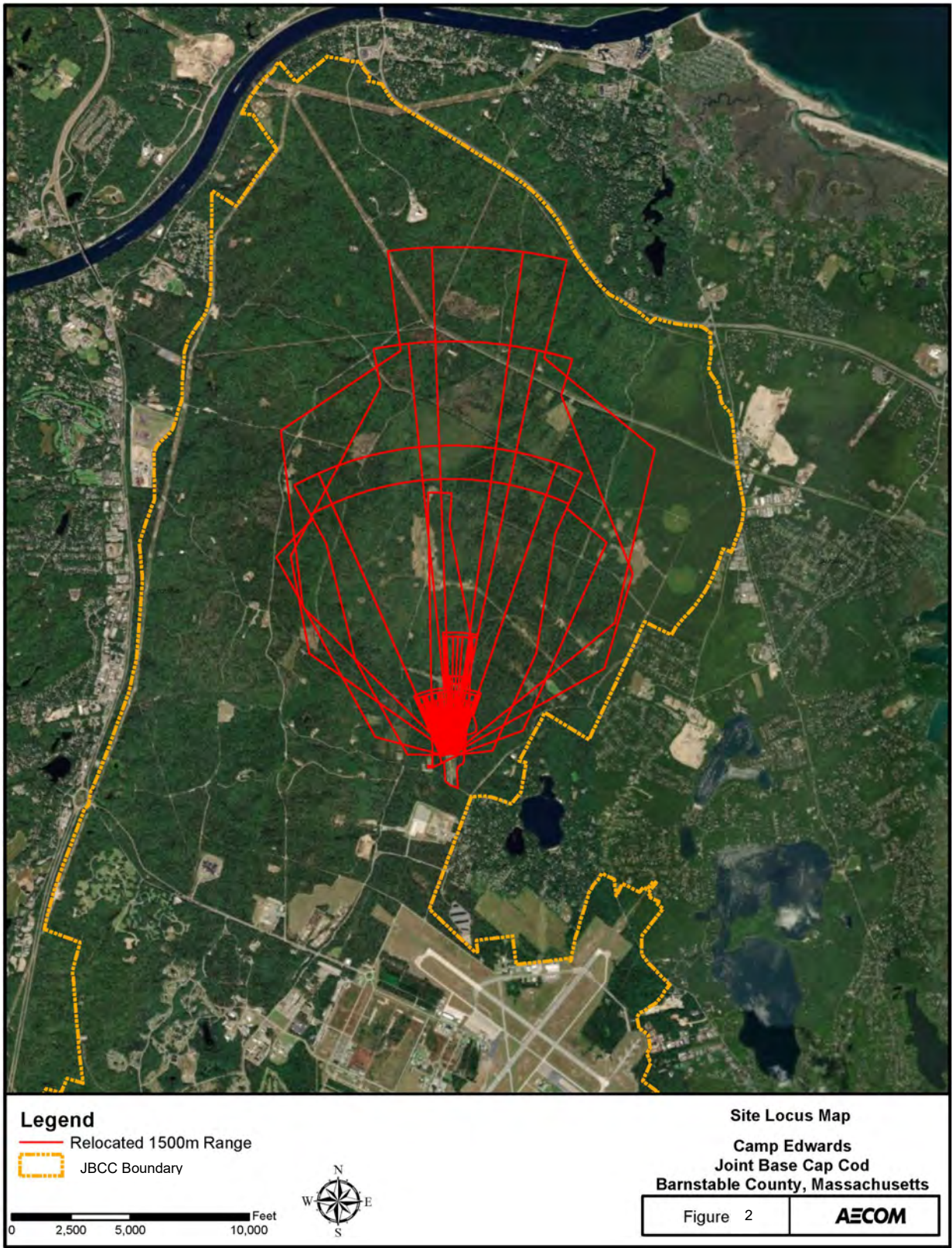


FIGURE 2.

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New England District
696 Virginia Road
Concord, MA 01742-2751
Attn: Col. William M. Conde, District Engineer,
Commander

United States Department of Agriculture
Natural Resources Conservation Service
451 West Street
Amherst, MA 01002-2953
Attn: Nicole Viars, Acting State Conservationist

United States Environmental Protection Agency
Region 1
5 Post Office Square - Suite 100
Boston, MA 02109-3912
Attn: Deborah Szaro, Regional Administrator

United States Fish & Wildlife Service
Office of the Regional Director
300 Westgate Center Drive
Hadley, MA 01035-9589
Attn: Wendi Weber, Regional Director

STATE AGENCIES

Massachusetts Department of Environmental
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One Winter Street
Boston, MA 02108
Attn: Martin Suuberg, Commissioner

Massachusetts Department of Environmental
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Division of Waterways & Wetlands
One Winter Street
Boston, MA 02108
Attn: Stephanie Moura, Division Director

Massachusetts Natural Heritage and
Endangered Species Program
MassWildlife
1 Rabbit Hill Road
Westborough, MA 01581
Attn: Eve Schluter, NHESP Assistant Director

Massachusetts Department of Conservation
and Recreation
Planning and Engineering
251 Causeway Street, Suite 600
Boston, MA 02114-2104
Attn: Leo Roy, Commissioner

Massachusetts Department of Conservation
and Recreation
Division of Water Supply Protection
251 Causeway Street, Suite 600
Boston, MA 02114-2104
Attn: John Scannell, Director

Massachusetts Historical Commission
State Historic Preservation Officer
220 Morrissey Boulevard
Boston, MA 02125
Attn: Brona Simon, Executive Director

Executive Office of Energy and Environmental
Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2524
Attn: Katie Theoharides, Executive Secretary

Cape Cod Conservation District
303 Main Street
W. Yarmouth, MA 02673

Department of Natural Resources Conservation
University of Massachusetts, Amherst
205 Holdsworth Way
Amherst, MA 01003-9285

Environmental Management Commission
Building 1204 West Inner Road
Camp Edwards, MA 02542-5003

LOCAL CONTACTS

Town of Bourne
24 Perry Avenue
Buzzards Bay, MA 02532
Attn: Thomas Guerino, Town Administrator

Town of Mashpee
16 Great Neck Road North
Mashpee, MA 02649
Attn: Rodney C. Collins, Town Manager

Town of Sandwich
130 Main Street
Sandwich, MA 02563
Attn: George Dunham, Town Manager

Town of Falmouth
59 Town Hall Square
Falmouth, MA 02540
Attn: Julian Suso, Town Manager

TRIBAL CONTACTS

Wampanoag Tribe of Gay Head (Aquinnah)
20 Black Brook Road
Aquinnah, MA 02535
Attn: Bettina Washington, Tribe Historic
Preservation Officer

Mashpee Wampanoag Tribe
P.O. Box 1048
483 Great Neck Road South
Mashpee, MA 02649
Attn: David Weeden, Tribal Historic
Preservation Officer

Stockbridge - Munsee Tribe of Mohican,
Wisconsin
W13447 Camp 14 Road
Bowler, WI 54416
Attn: Sherry White, Tribal Historic Preservation
Manager/NAGPRA

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7 August 2019

Cape Cod Conservation District
303 Main Street
W. Yarmouth, MA 02673

RE: Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) for the Environmental Assessment (EA) for the Multi-Purpose Machine Gun Range, Camp Edwards, Massachusetts

To whom it may concern:

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Sincerely,



Keith J. Driscoll
NEPA/MEPA Manager
Massachusetts National Guard
Keith.j.driscoll.nfg@mail.mil
339-202-3980

Please send responses to:

Kathryn Barnicle
AECOM
9 Jonathan Bourne Drive
Pocasset, MA 02559
Kathryn.barnicle@aecom.com
508-833-6953

Camp Edwards and Joint Base Cape Cod Barnstable County, Massachusetts

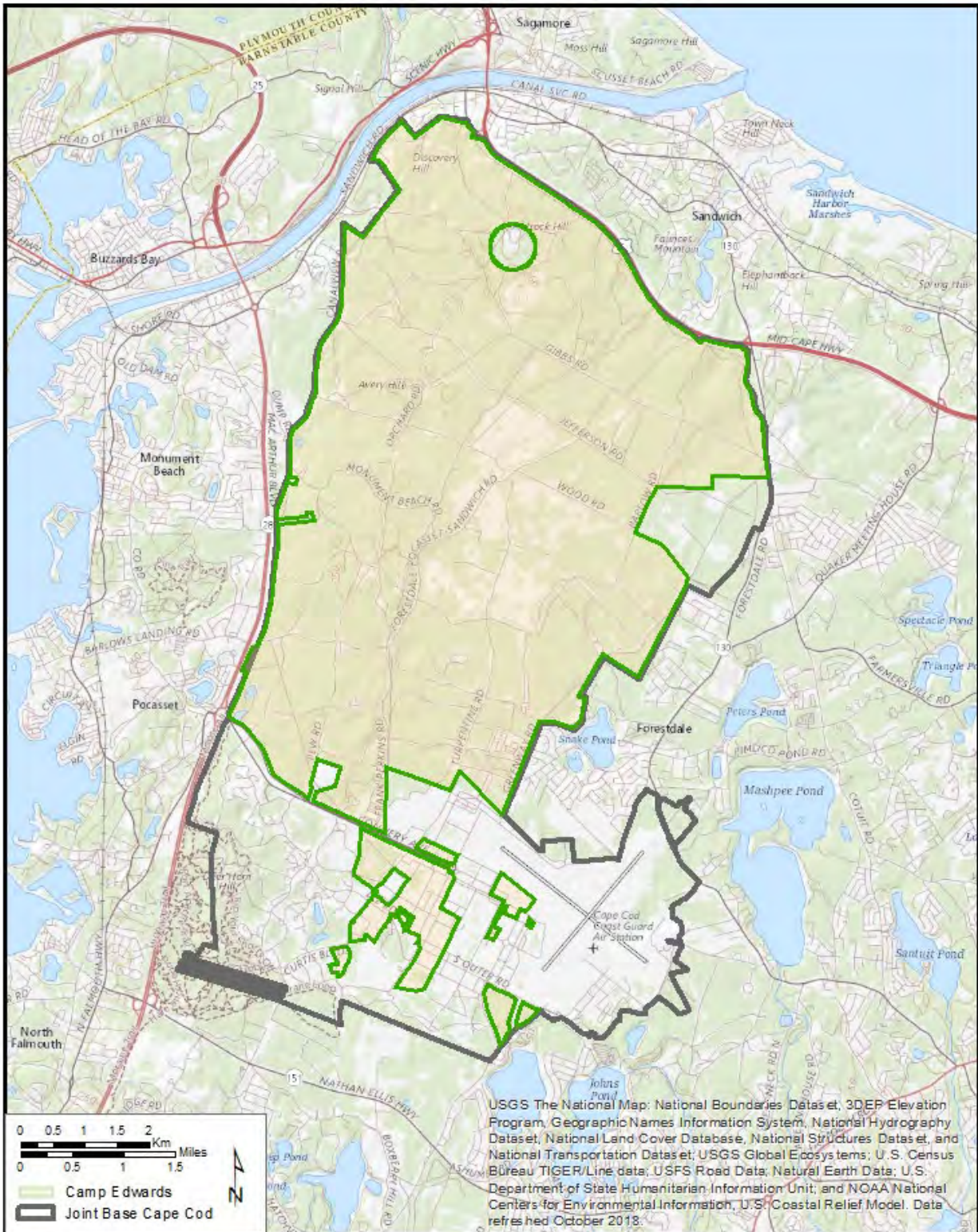


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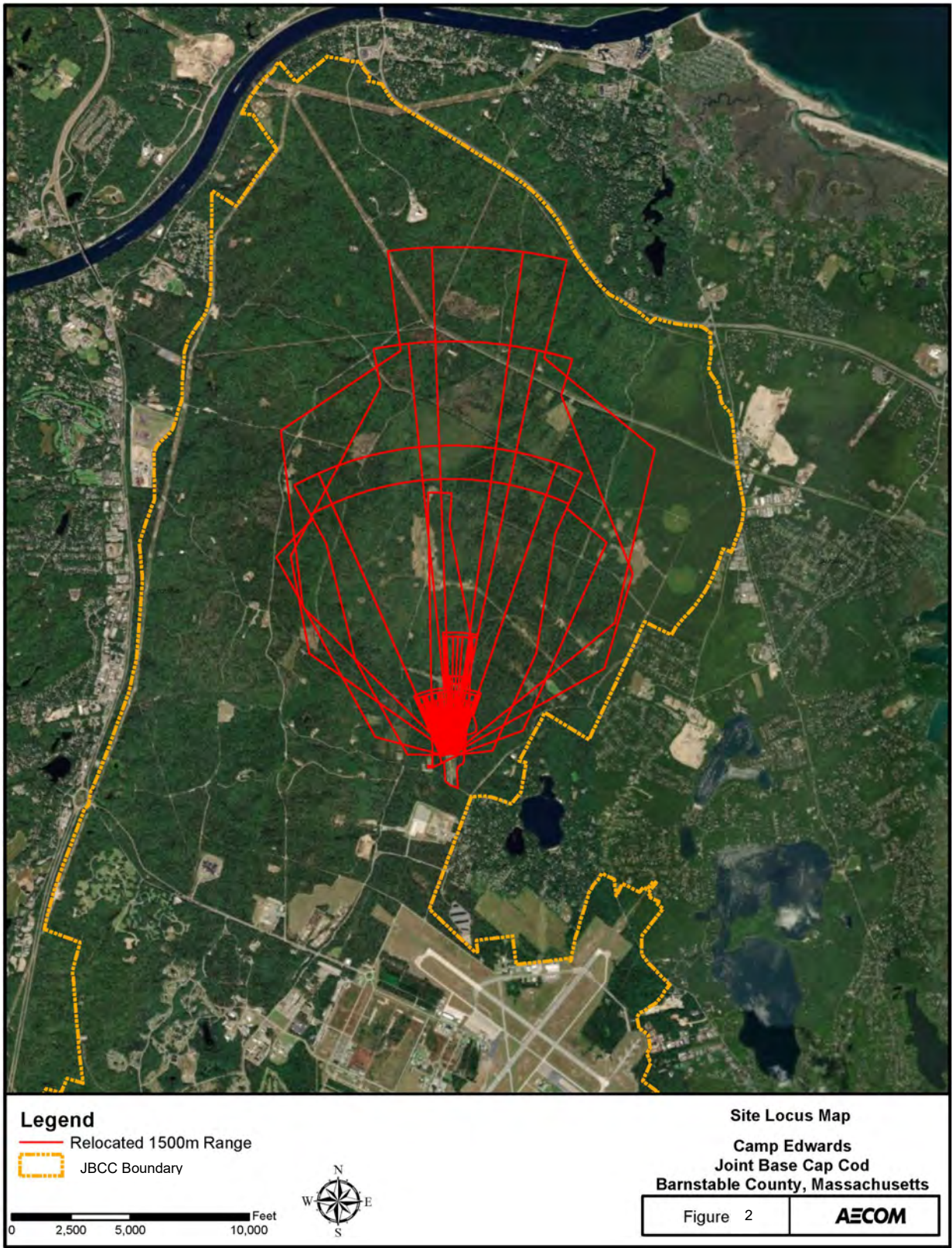


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7 August 2019

Environmental Management Commission
Building 1204 West Inner Road
Camp Edwards, MA 02542-5003
Attn: Mark Begley

RE: Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) for the Environmental Assessment (EA) for the Multi-Purpose Machine Gun Range, Camp Edwards, Massachusetts

Dear Mr. Begley:

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Sincerely,



Keith J. Driscoll
 NEPA/MEPA Manager
 Massachusetts National Guard
Keith.j.driscoll.nfg@mail.mil
 339-202-3980

Please send responses to:
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 Pocasset, MA 02559
Kathryn.barnicle@aecom.com
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Camp Edwards and Joint Base Cape Cod Barnstable County, Massachusetts

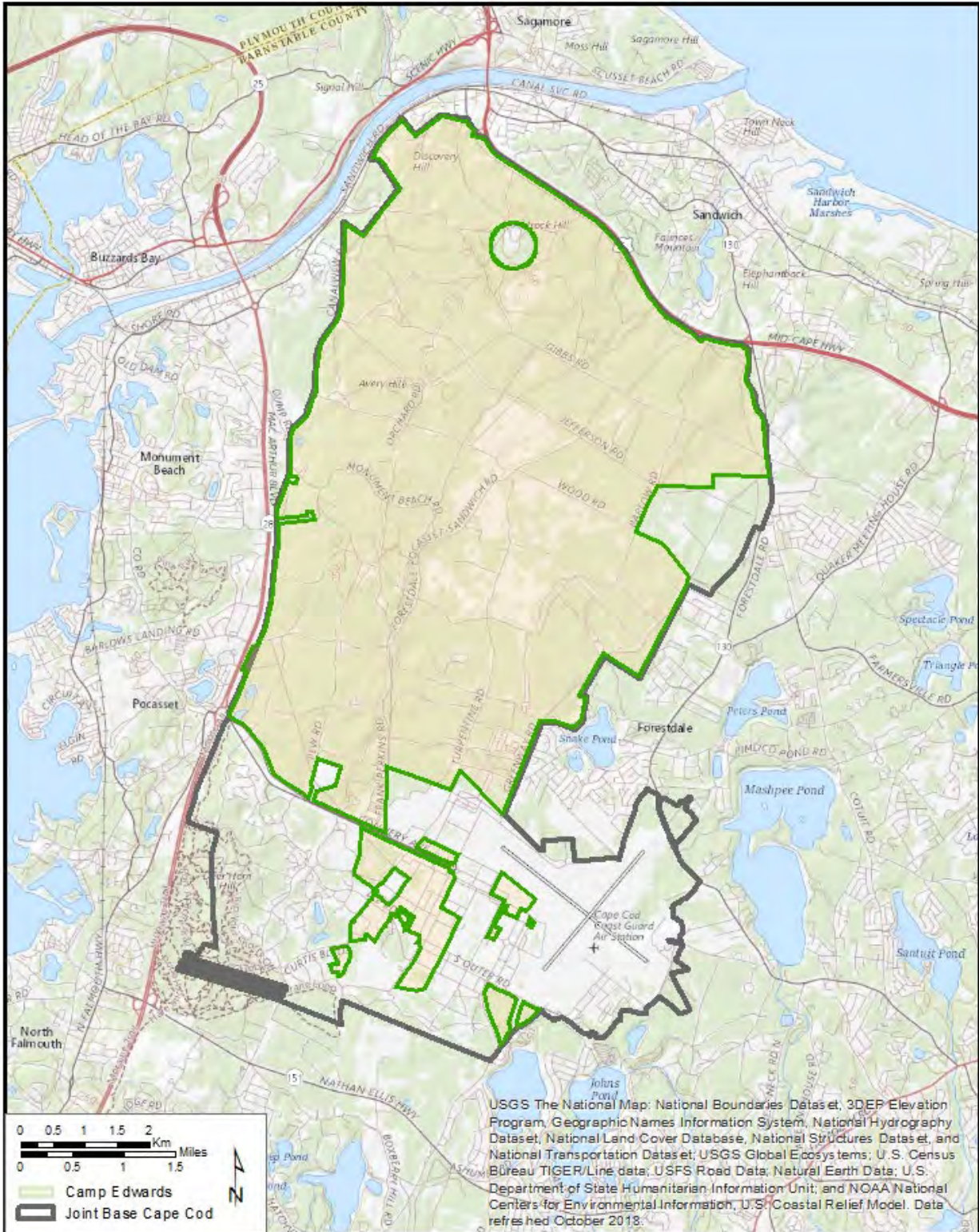


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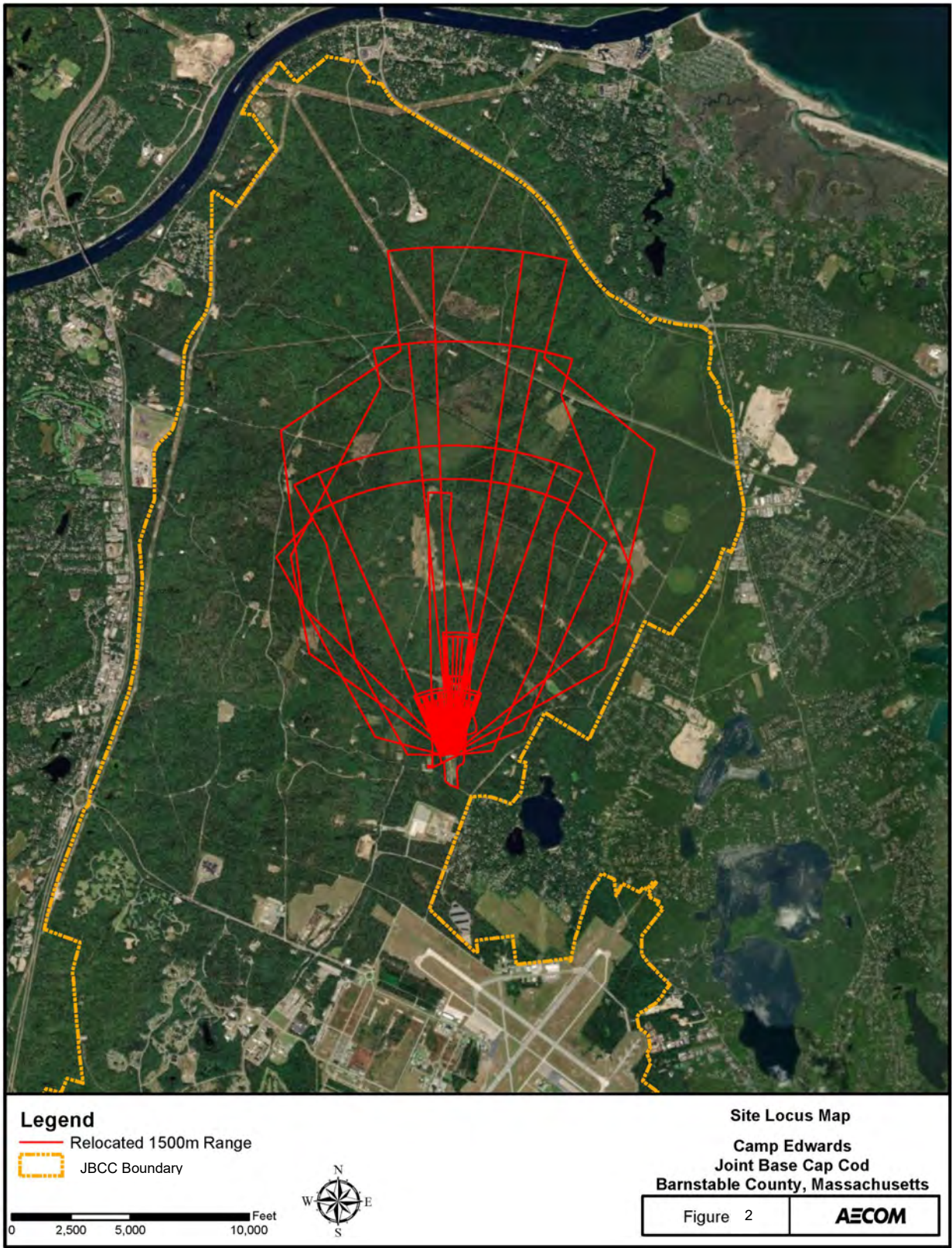


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Attn: Sherry White, Tribal Historic Preservation
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Attn: Jonathan Idman, Chief Regulatory Officer



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Sincerely,



Keith J. Driscoll
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Keith.j.driscoll.nfg@mail.mil
 339-202-3980

Please send responses to:

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Camp Edwards and Joint Base Cape Cod Barnstable County, Massachusetts

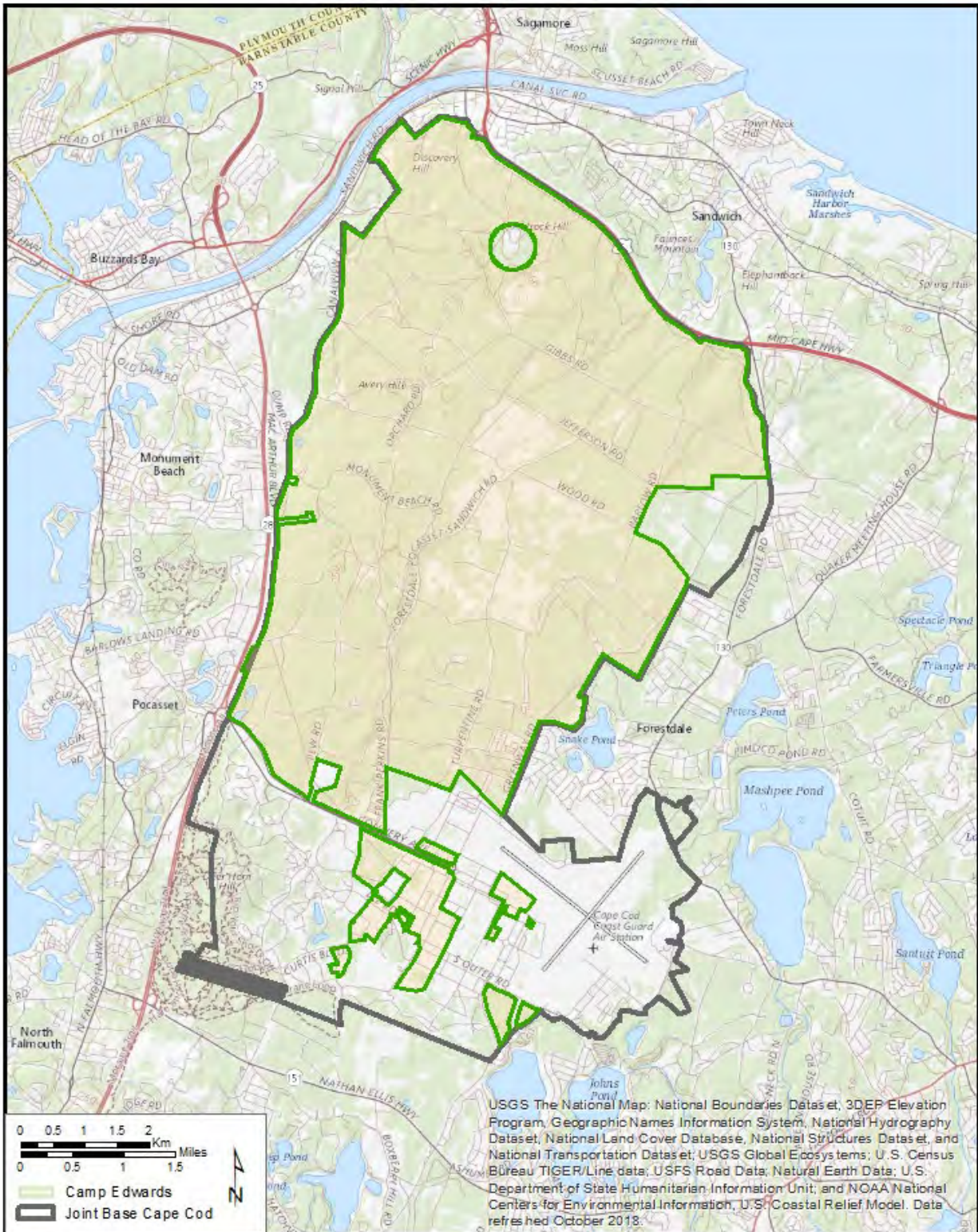


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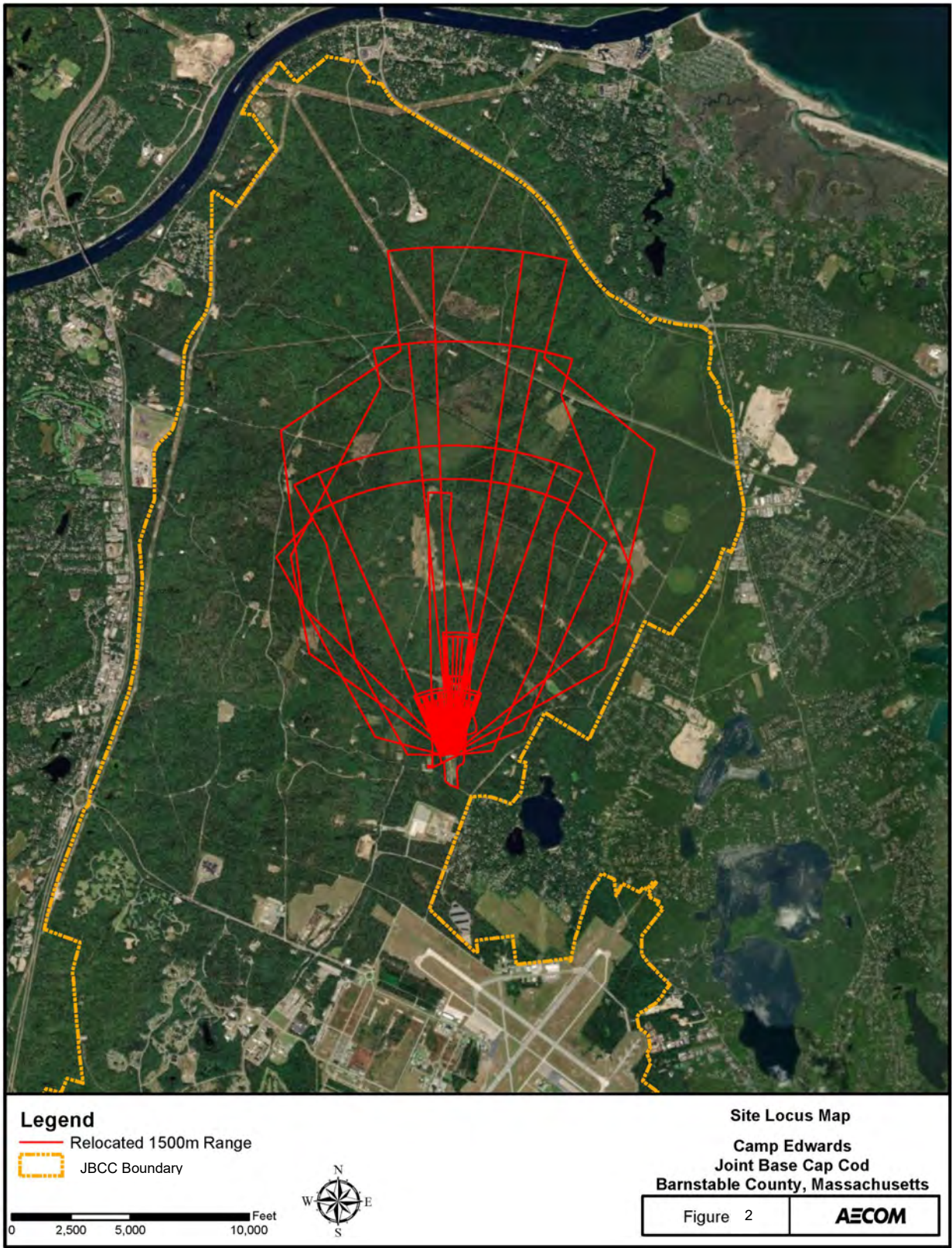


FIGURE 2.

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State Historic Preservation Officer
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Attn: Brona Simon, Executive Director

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HANSCOM AFB, MA 01731-3001

7 August 2019

Massachusetts Department of Environmental Protection
Division of Waterways & Wetlands
One Winter Street
Boston, MA 02108
Attn: Stephanie Moura, Division Director

RE: Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) for the Environmental Assessment (EA) for the Multi-Purpose Machine Gun Range, Camp Edwards, Massachusetts

Dear Ms. Moura:

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The proposed improvements would occur at the existing Known Distance (KD) Range. The KD Range is one of the small arms ranges within Camp Edwards Training Site as shown on **Figure 2**. The parcel is currently leased from the Commonwealth of Massachusetts by the Department of the Army, which in turn licenses the land to the MAARNG.

This project entails the siting and development of range specific engineered structures such as enhanced soil berms behind each target to accomplish to the maximum extent practicable metal recovery and recycling, prevention of fragmentation and ricochets, and prevention of sub-surface percolation of residue associated with the range operations.

The project proposal includes a process for selection of pollution prevention strategies and best management practices through the joint coordinated review efforts of the Environmental Management Commission, the United States Environmental Protection Agency and the Massachusetts Department of Environmental Protection.

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This EA provides a full comparative analysis of the following three alternatives:

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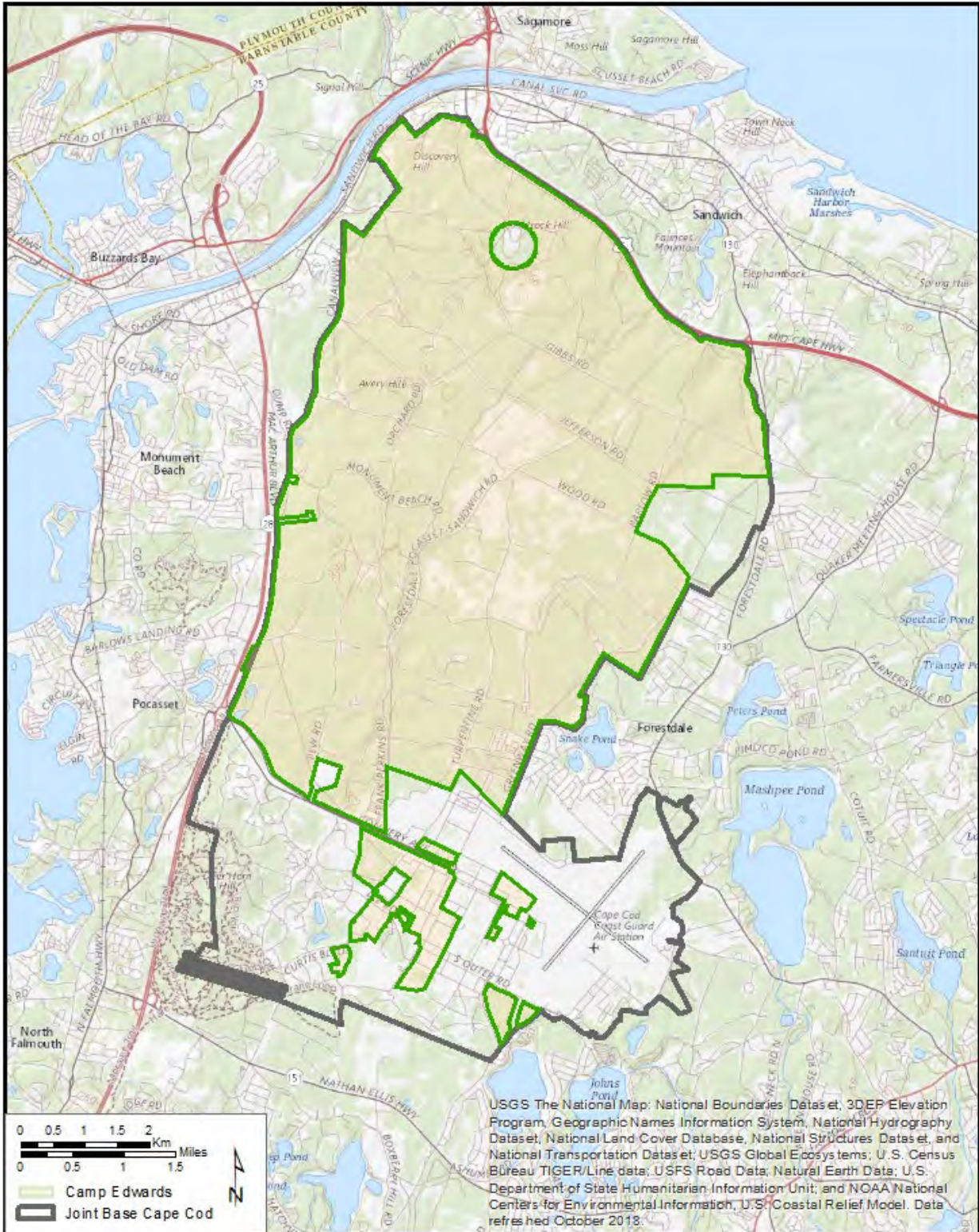
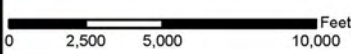


FIGURE 1.



Legend

- Relocated 1500m Range
- - - JBCC Boundary



Site Locus Map
Camp Edwards
Joint Base Cap Cod
Barnstable County, Massachusetts

Figure 2



FIGURE 2.

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7 August 2019

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Planning and Engineering
251 Causeway Street, Suite 600
Boston, MA 02114-2104
Attn: Leo Roy, Commissioner

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Dear Mr. Roy:

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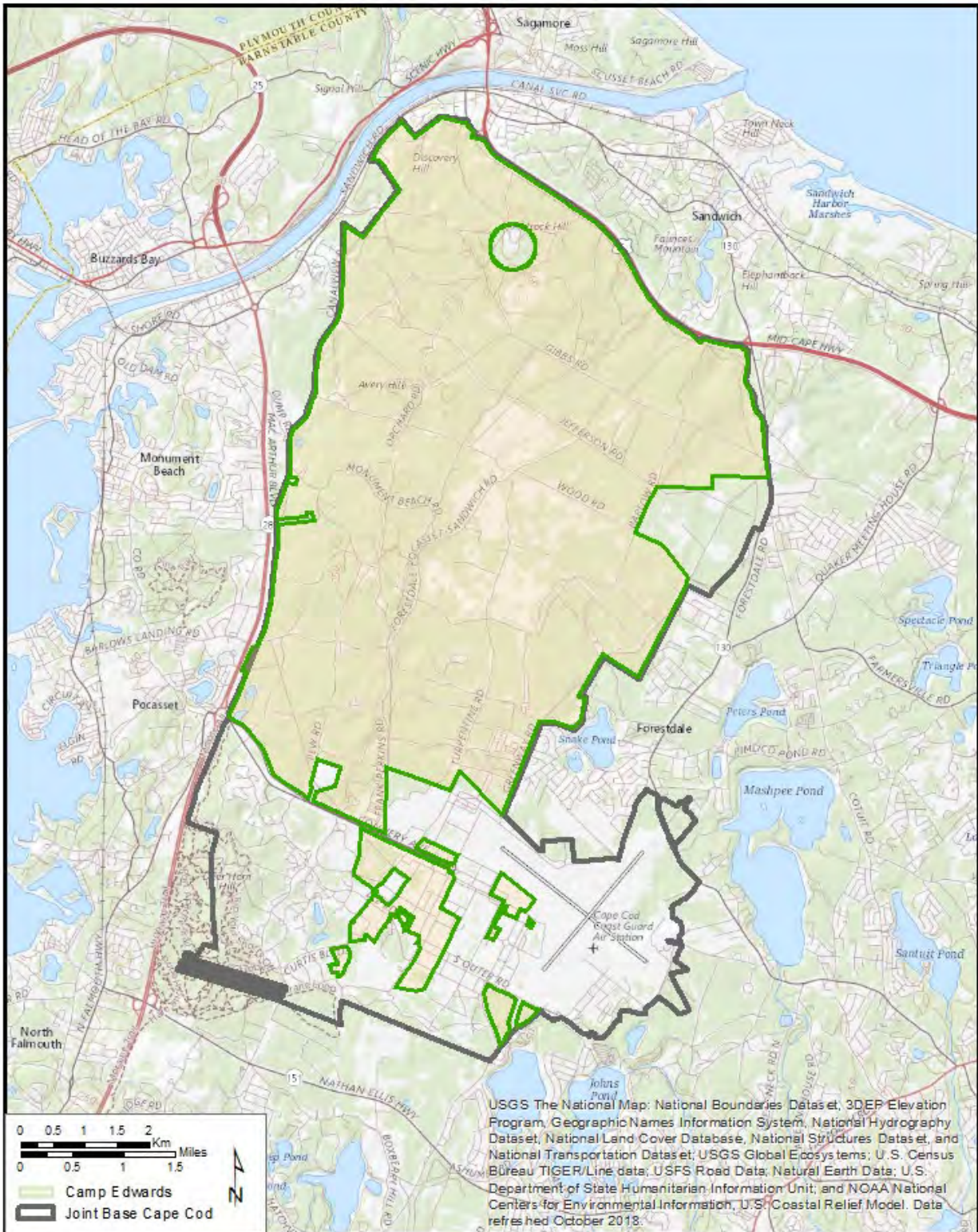


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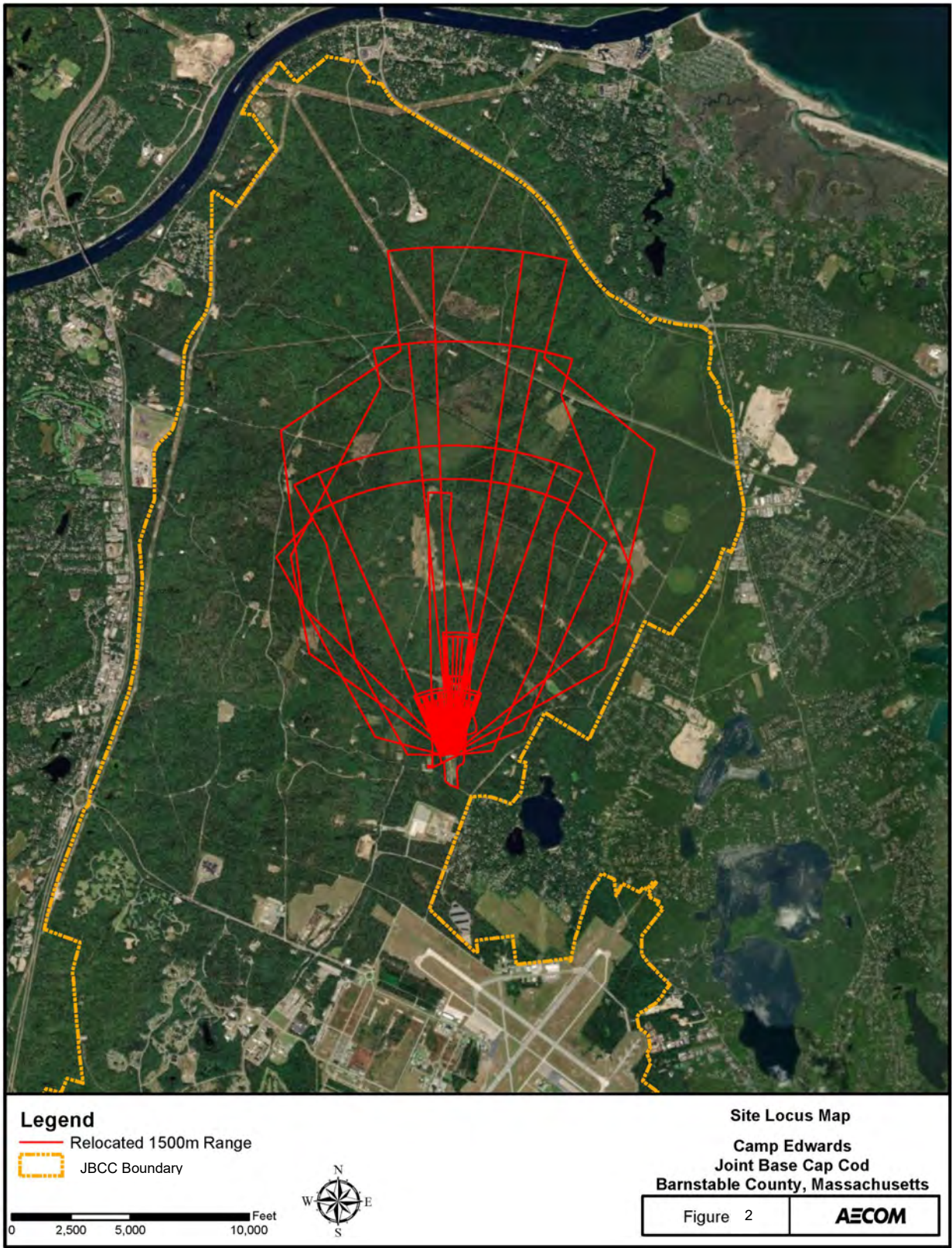


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7 August 2019

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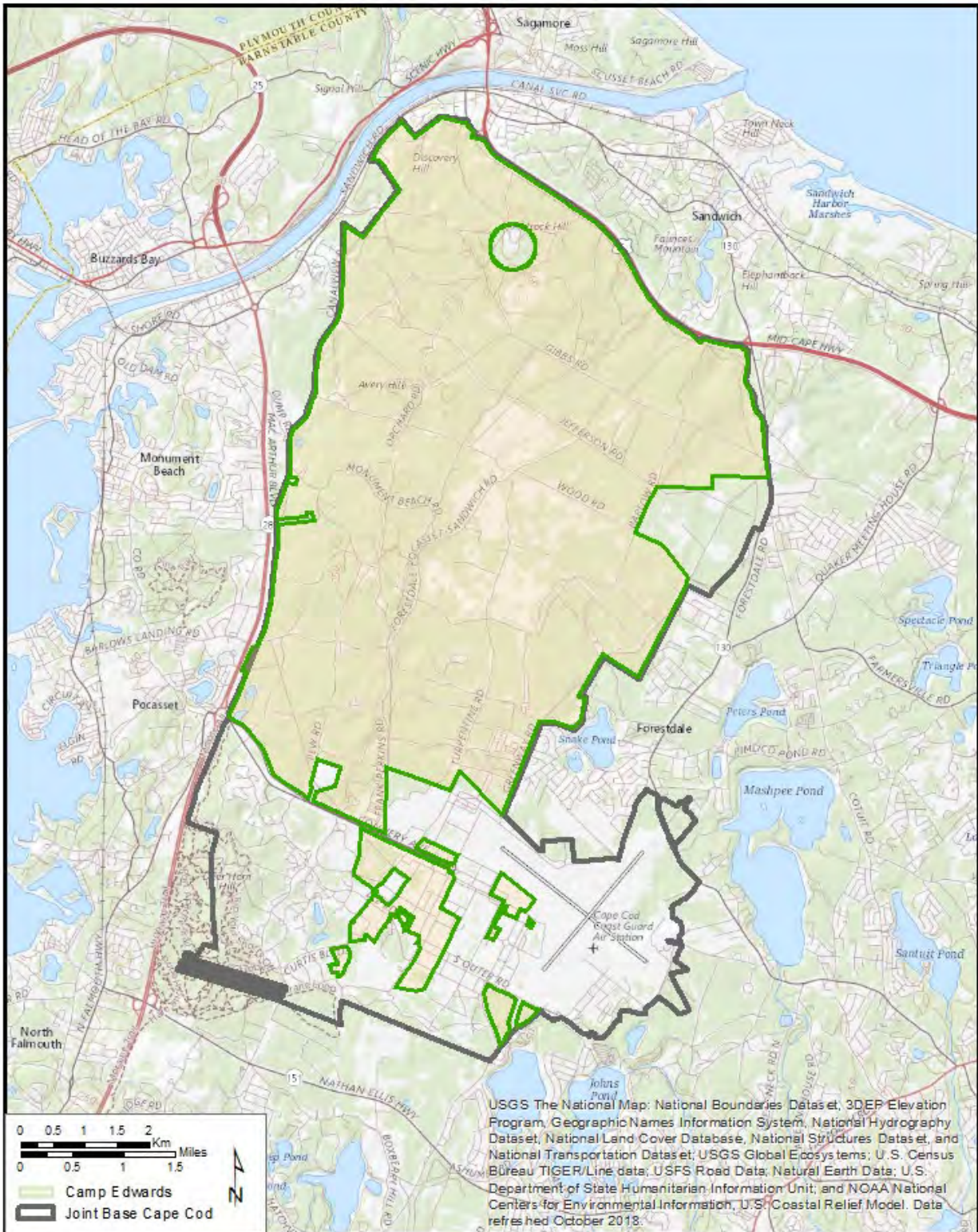


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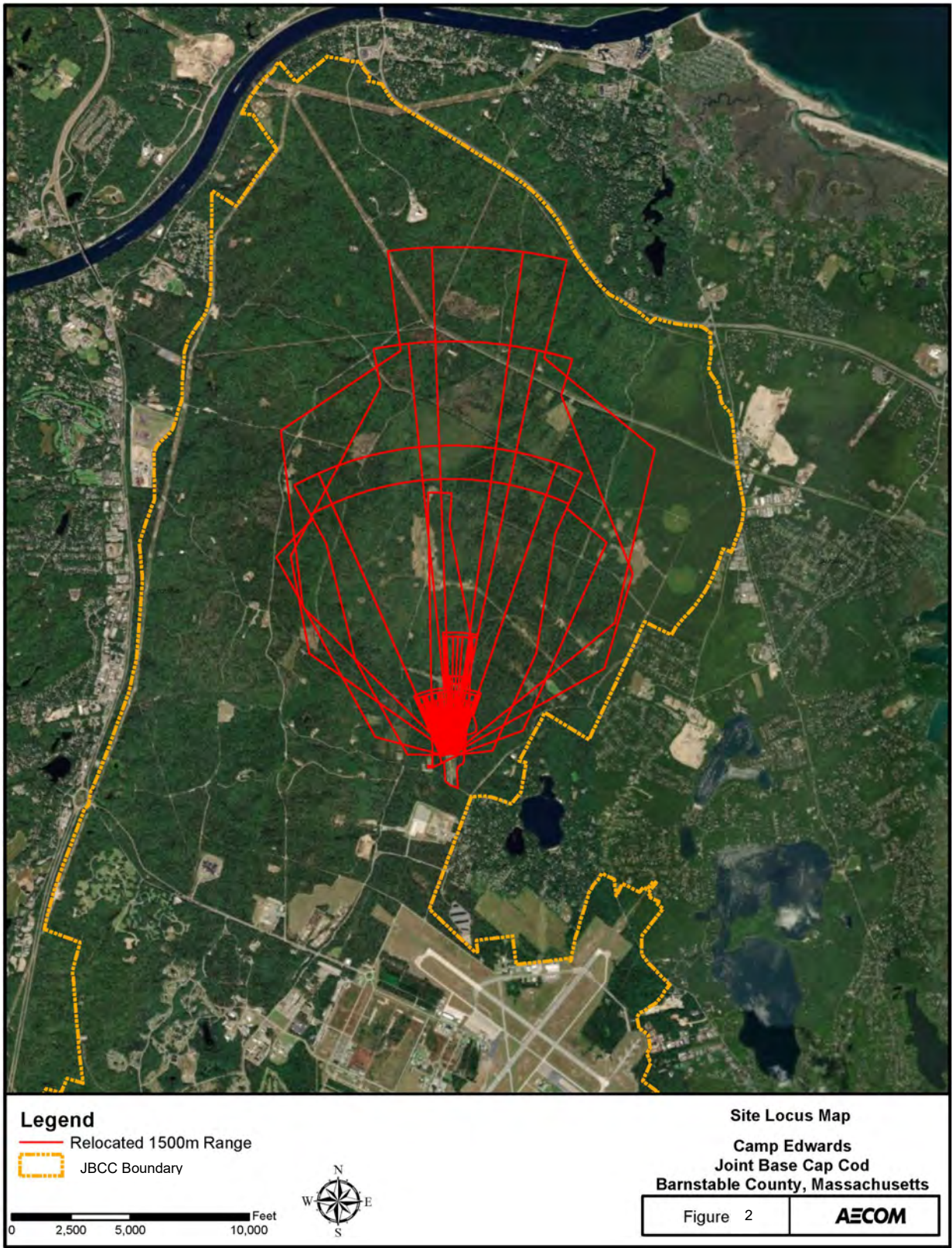


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7 August 2019

Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2524
Attn: Katie Theoharides, Executive Secretary

RE: Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) for the Environmental Assessment (EA) for the Multi-Purpose Machine Gun Range, Camp Edwards, Massachusetts

Dear Ms. Theoharides:

The Massachusetts Army National Guard (MAARNG) is preparing environmental documentation for the proposed construction and operation of a Multi-Purpose Machine Gun Range (MPMG) at Camp Edwards, Massachusetts (**Figure 1**).

Construction of a MPMG Range will provide MAARNG soldiers a modernized small arms training venue to efficiently accomplish mission training to include weapons qualification requirements in a manner that protects both human health and the environment.

The proposed improvements would occur at the existing Known Distance (KD) Range. The KD Range is one of the small arms ranges within Camp Edwards Training Site as shown on **Figure 2**. The parcel is currently leased from the Commonwealth of Massachusetts by the Department of the Army, which in turn licenses the land to the MAARNG.

This project entails the siting and development of range specific engineered structures such as enhanced soil berms behind each target to accomplish to the maximum extent practicable metal recovery and recycling, prevention of fragmentation and ricochets, and prevention of sub-surface percolation of residue associated with the range operations.

The project proposal includes a process for selection of pollution prevention strategies and best management practices through the joint coordinated review efforts of the Environmental Management Commission, the United States Environmental Protection Agency and the Massachusetts Department of Environmental Protection.

An Environmental Assessment (EA) is being prepared under the provisions of, and in accordance with, the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 *et seq.*), the Council of Environmental Quality [CEQ] Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), 32 CFR 651 (*Environmental Effects of Army Actions*) and the National Guard Bureau (NGB) *NEPA Handbook – Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with National Environmental Policy Act of 1969*.

This EA provides a full comparative analysis of the following three alternatives:

- **Alternative 1: Preferred Project Alternative** – This alternative will implement the proposed project by constructing an eight lane MPMG Range at the existing KD Range. The range footprint would consist of eight 800 meters long lanes with a width of 25 meters at the firing line to a width of 100 meters at a distance of 800 meters. The two middle lanes (Lanes 5 and 6) will be an additional 700 meters in length extending to a total overall distance of 1,500 meters for future .50 caliber usage. The extension of the .50 caliber lanes will be constructed at a future date. To accommodate the MPMG range footprint approximately 97 acres of additional ground disturbance/tree clearing is required.
- **Alternative 2: Southerly Location Alternative** – This alternative would implement the Proposed Action at a more southerly location at the KD Range. The construction would fulfill the assigned mission requirements but would result in greater impacts, specifically with noise.
- **Alternative 3: No-Action Alternative** – This alternative would not implement the Proposed Action and would allow the existing training and operations to continue without an MPMG Range. Units would travel to either New York, New Jersey, or Vermont to qualify on the nearest MPMG Range.

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We look forward to your participation in this NEPA review process. Your response on or before 6 September 2019 will enable us to complete this phase of the project within the scheduled time frame.

If you have any questions concerning this request, please do not hesitate to contact myself or our consultant, Kathryn Barnicle at AECOM at 508-833-6953 or the mailing address listed below. If preferable, you may e-mail your response to kathryn.barnicle@aecom.com.

Sincerely,



Keith J. Driscoll
 NEPA/MEPA Manager
 Massachusetts National Guard
Keith.j.driscoll.nfg@mail.mil
 339-202-3980

Please send responses to:

Kathryn Barnicle
 AECOM
 9 Jonathan Bourne Drive
 Pocasset, MA 02559
Kathryn.barnicle@aecom.com
 508-833-6953

Camp Edwards and Joint Base Cape Cod Barnstable County, Massachusetts

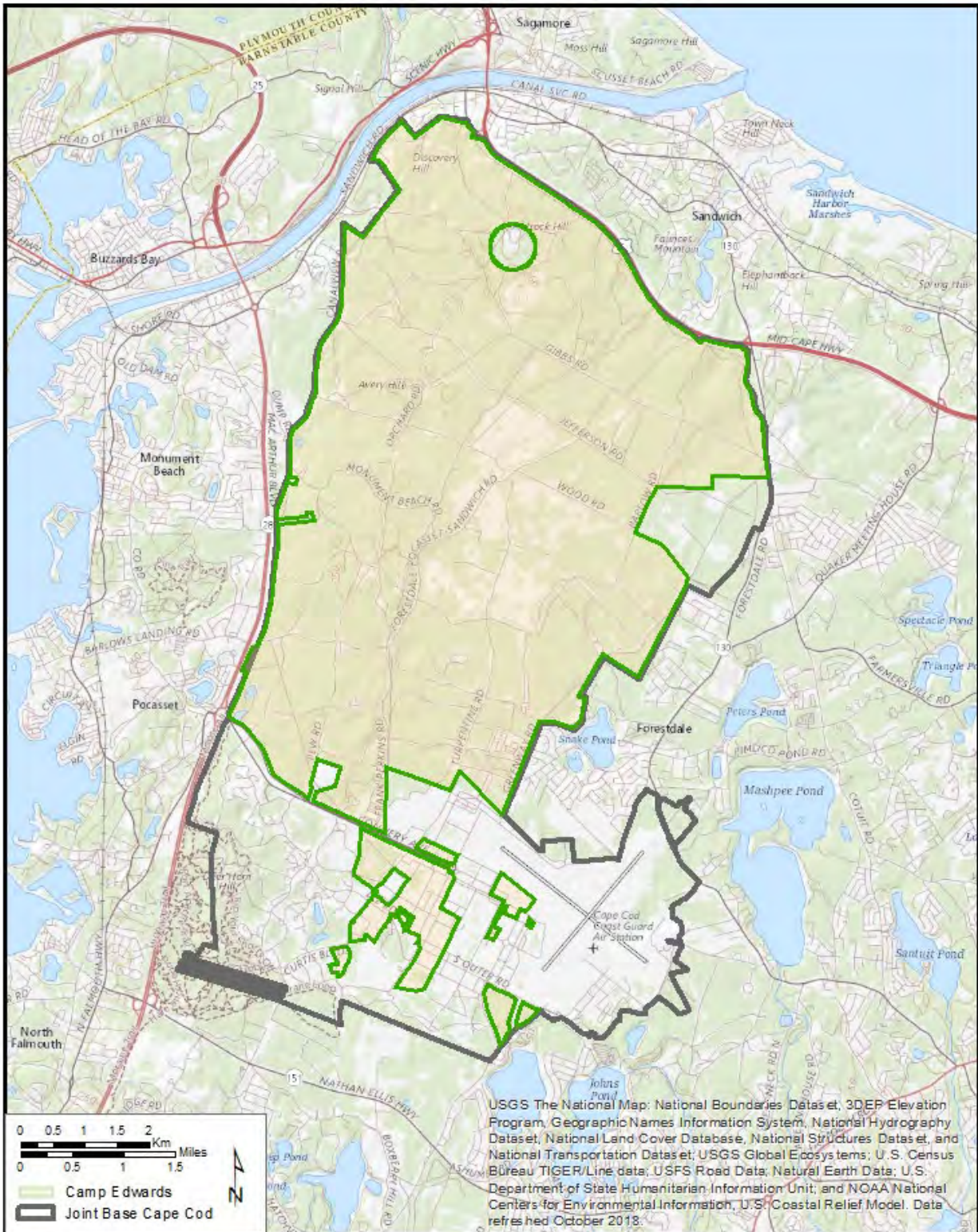
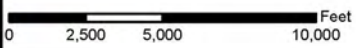


FIGURE 1.



Legend

- Relocated 1500m Range
- - - JBCC Boundary



Site Locus Map
Camp Edwards
Joint Base Cap Cod
Barnstable County, Massachusetts

Figure 2



FIGURE 2.

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7 August 2019

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Attn: Eve Schluter, NHESP Assistant Director

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Keith.j.driscoll.nfg@mail.mil
 339-202-3980

Please send responses to:

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Camp Edwards and Joint Base Cape Cod Barnstable County, Massachusetts

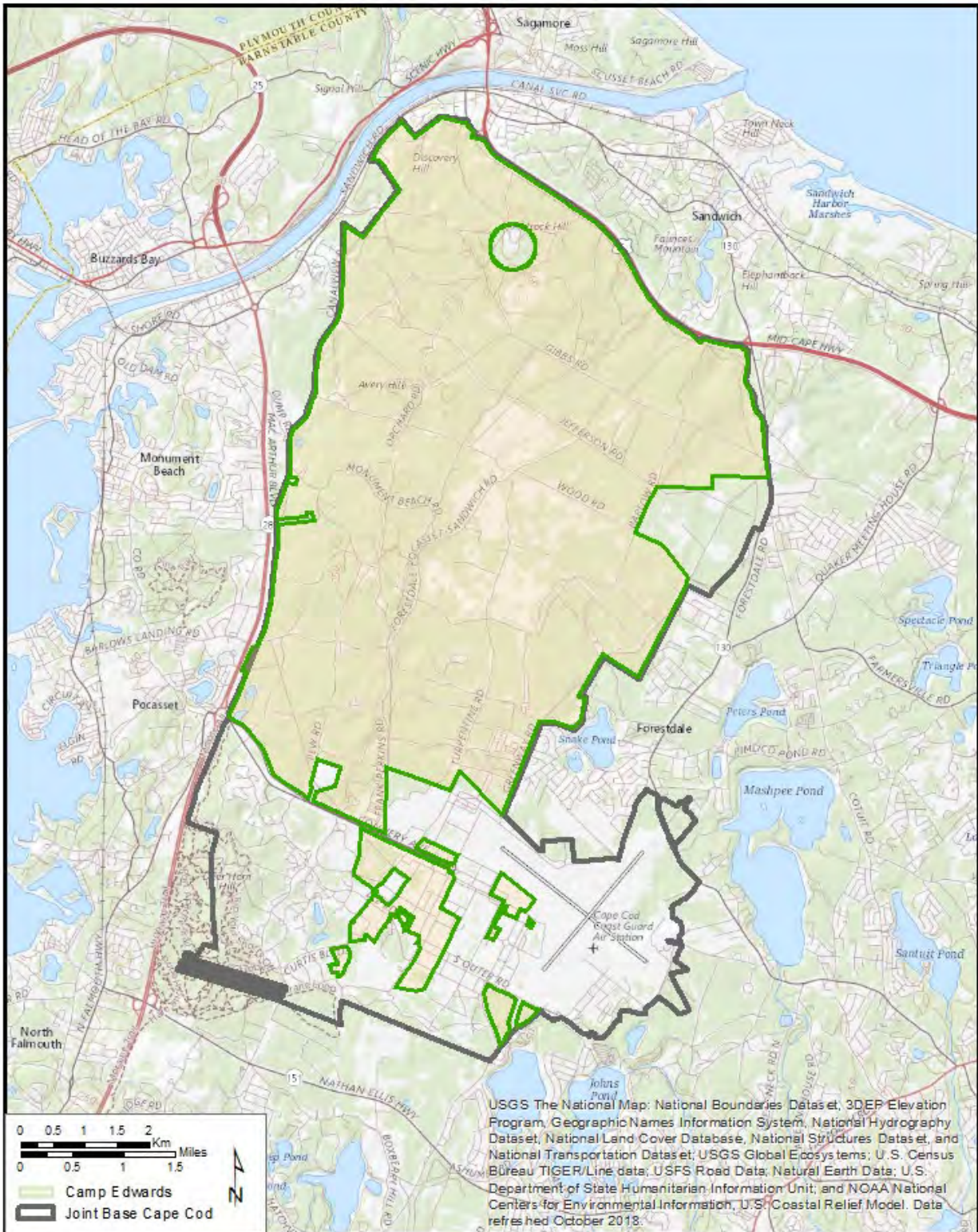


FIGURE 1.

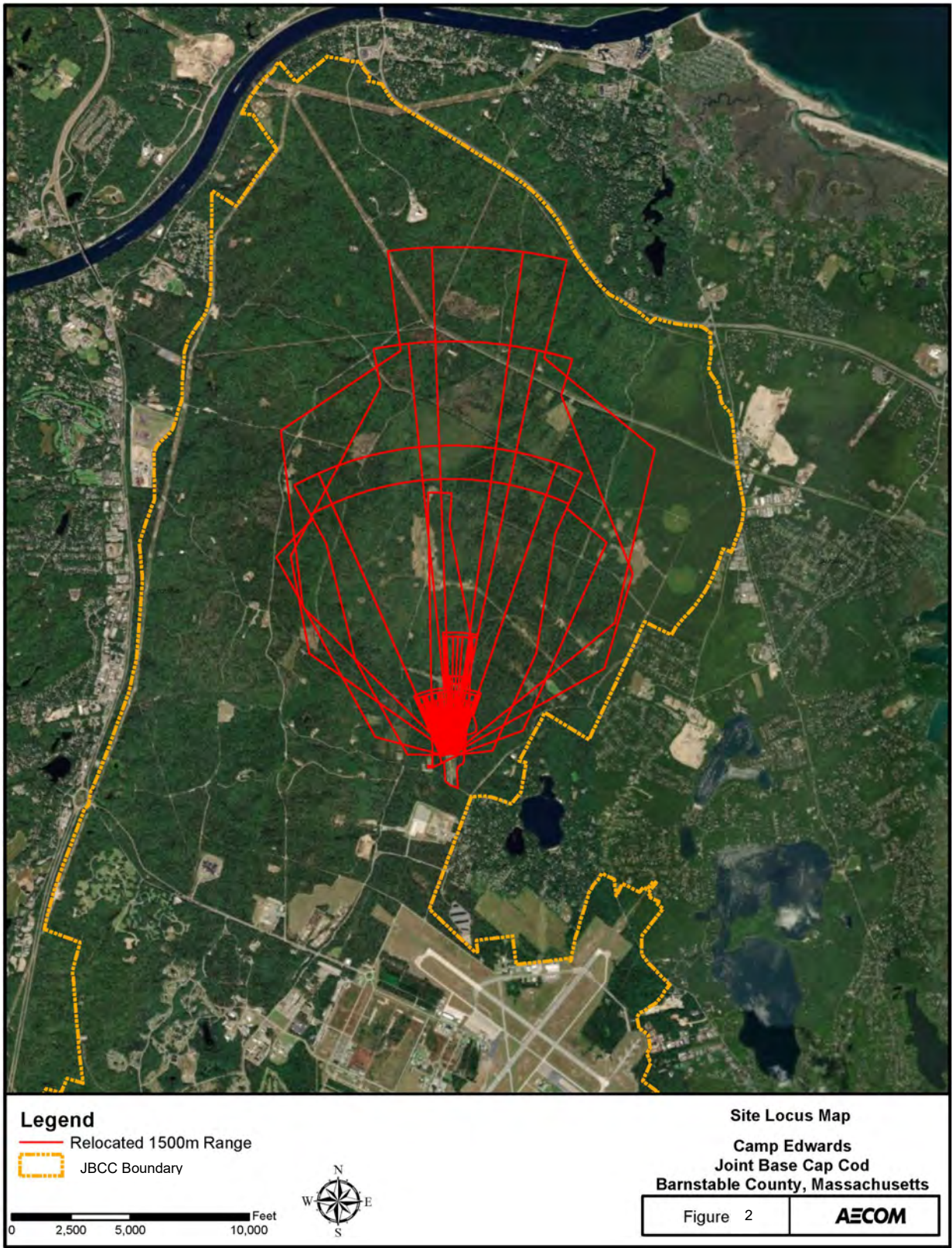


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7 August 2019

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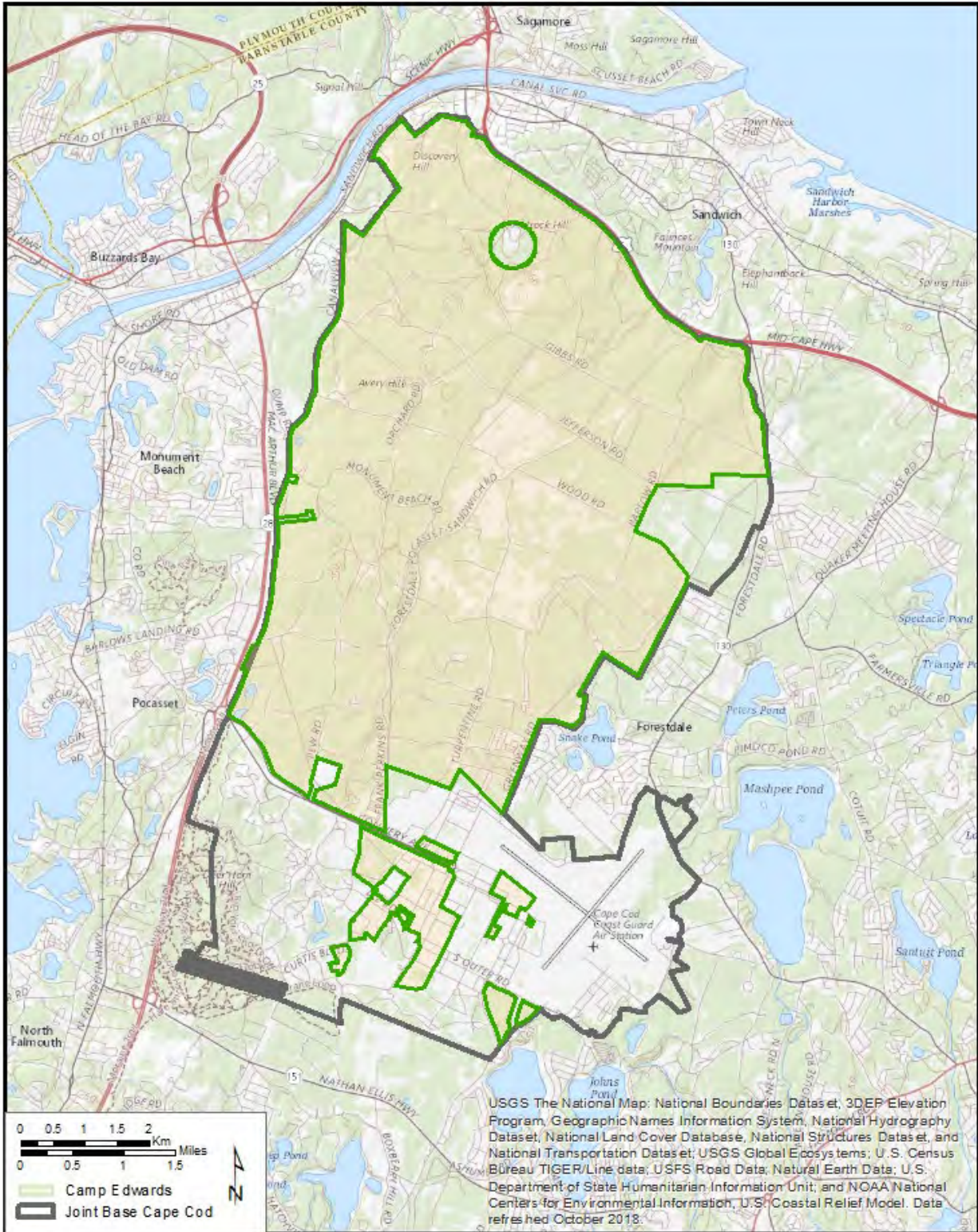


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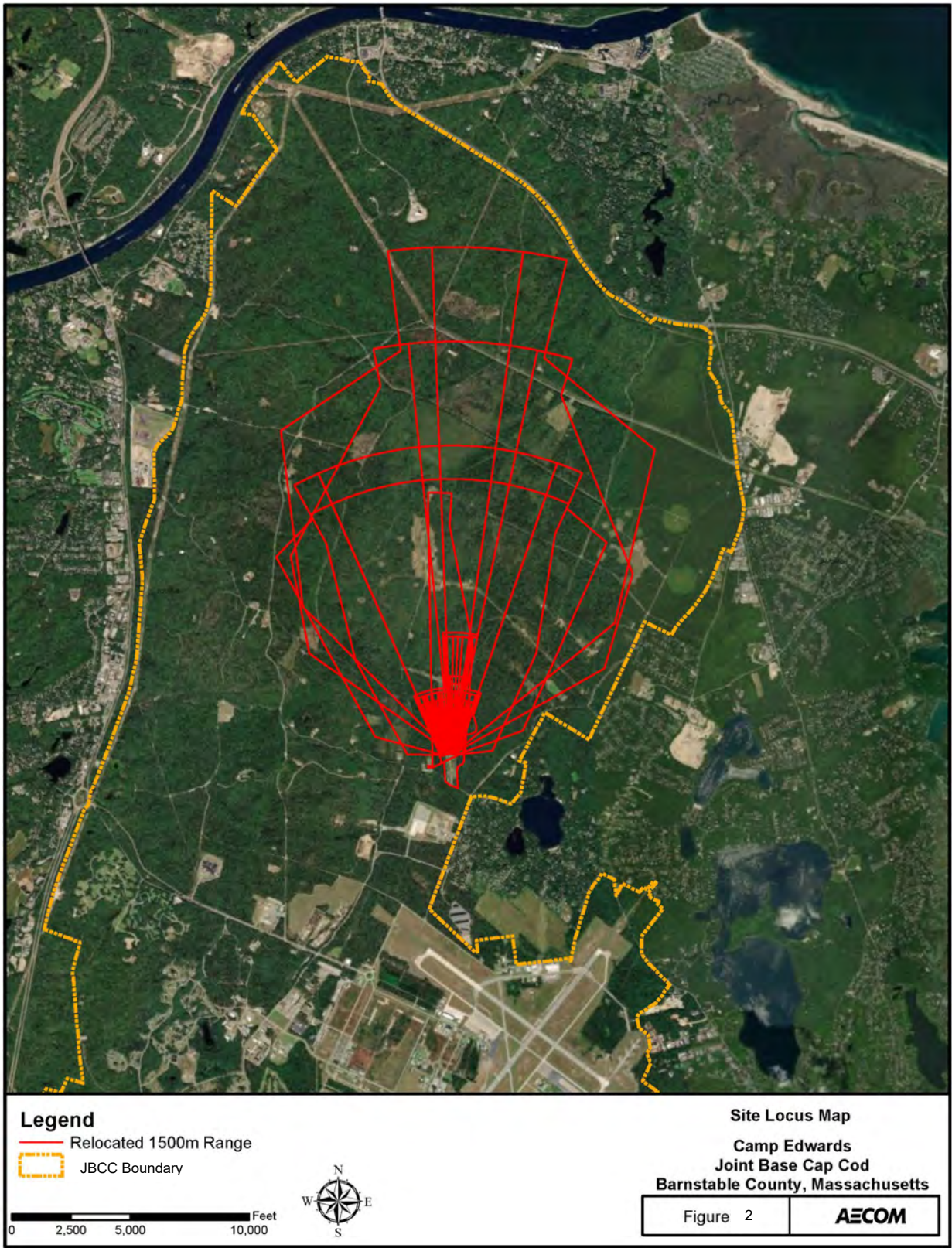


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The Massachusetts Army National Guard (MAARNG) is preparing environmental documentation for the proposed construction and operation of a Multi-Purpose Machine Gun Range (MPMG) at Camp Edwards, Massachusetts (**Figure 1**).

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Sincerely,



Keith J. Driscoll
 NEPA/MEPA Manager
 Massachusetts National Guard
Keith.j.driscoll.nfg@mail.mil
 339-202-3980

Please send responses to:

Kathryn Barnicle
 AECOM
 9 Jonathan Bourne Drive
 Pocasset, MA 02559
Kathryn.barnicle@aecom.com
 508-833-6953

Camp Edwards and Joint Base Cape Cod Barnstable County, Massachusetts

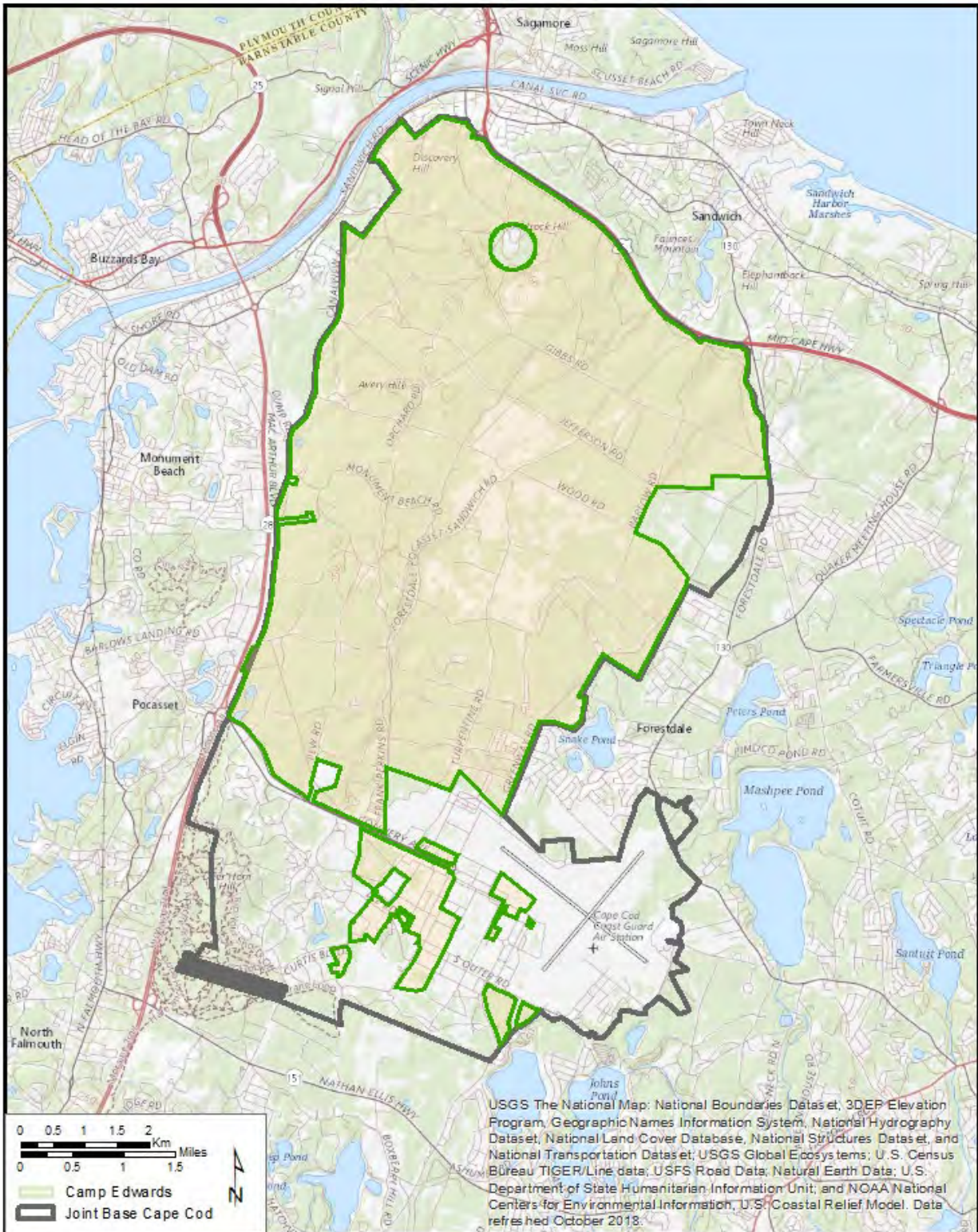
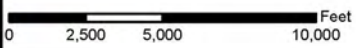


FIGURE 1.



Legend

- Relocated 1500m Range
- - - JBCC Boundary



Site Locus Map
Camp Edwards
Joint Base Cap Cod
Barnstable County, Massachusetts

Figure 2



FIGURE 2.

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Attn: Nicole Viars, Acting State Conservationist

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Attn: Wendi Weber, Regional Director

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Attn: Martin Suuberg, Commissioner

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Division of Waterways & Wetlands
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Attn: Stephanie Moura, Division Director

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Attn: Eve Schluter, NHESP Assistant Director

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State Historic Preservation Officer
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Boston, MA 02125
Attn: Brona Simon, Executive Director

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Boston, MA 02114-2524
Attn: Katie Theoharides, Executive Secretary

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W. Yarmouth, MA 02673

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Amherst, MA 01003-9285

Environmental Management Commission
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Attn: George Dunham, Town Manager

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Attn: Julian Suso, Town Manager

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Attn: David Weeden, Tribal Historic
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Stockbridge - Munsee Tribe of Mohican,
Wisconsin
W13447 Camp 14 Road
Bowler, WI 54416
Attn: Sherry White, Tribal Historic Preservation
Manager/NAGPRA

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P.O. Box 226
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Attn: Kristy Senatori, Executive Director
Attn: Jonathan Idman, Chief Regulatory Officer



DEPARTMENTS OF THE ARMY AND THE AIR FORCE
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HANSCOM AFB, MA 01731-3001

7 August 2019

Town of Mashpee
16 Great Neck Road North
Mashpee, MA 02649
Attn: Rodney C. Collins, Town Manager

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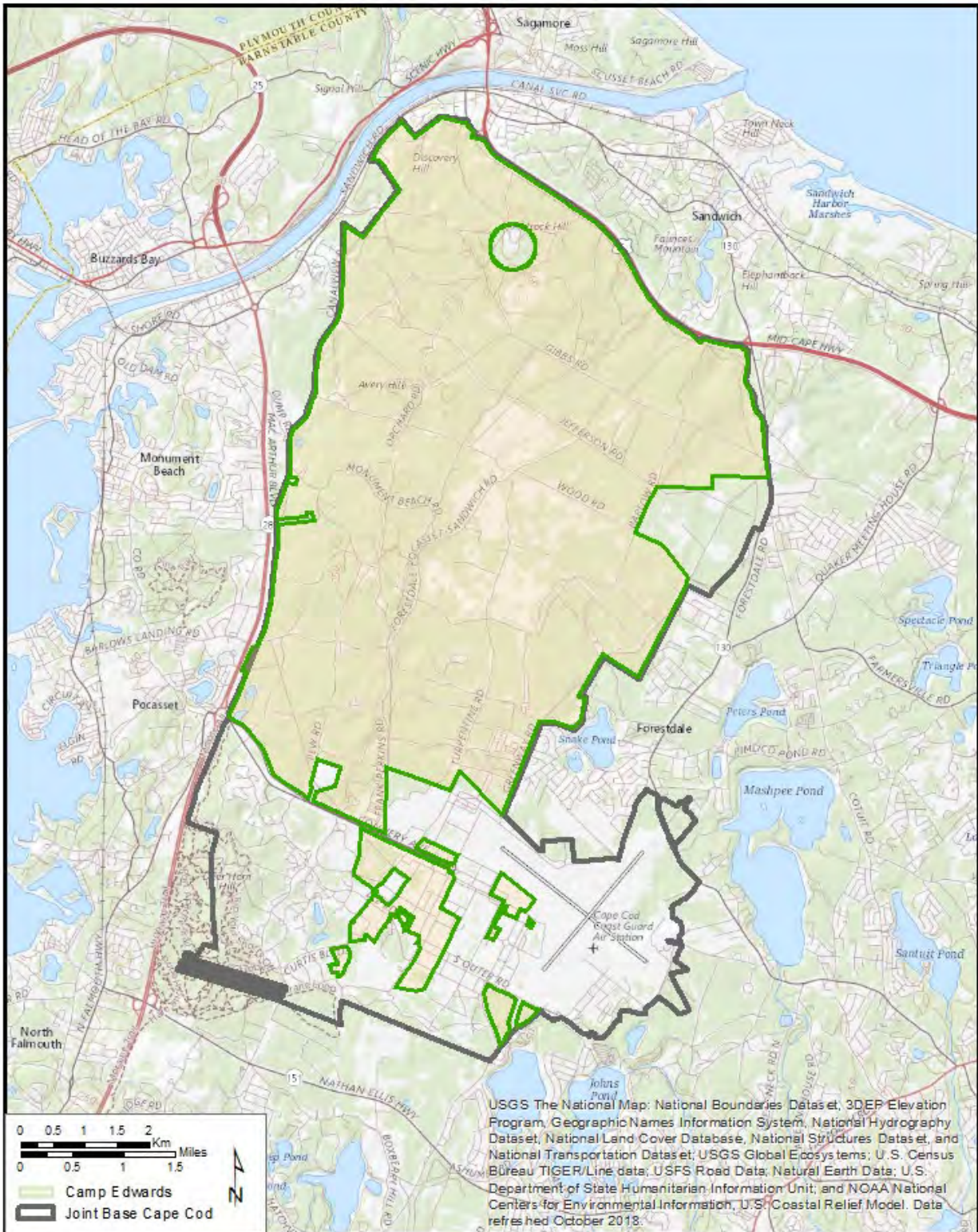


FIGURE 1.

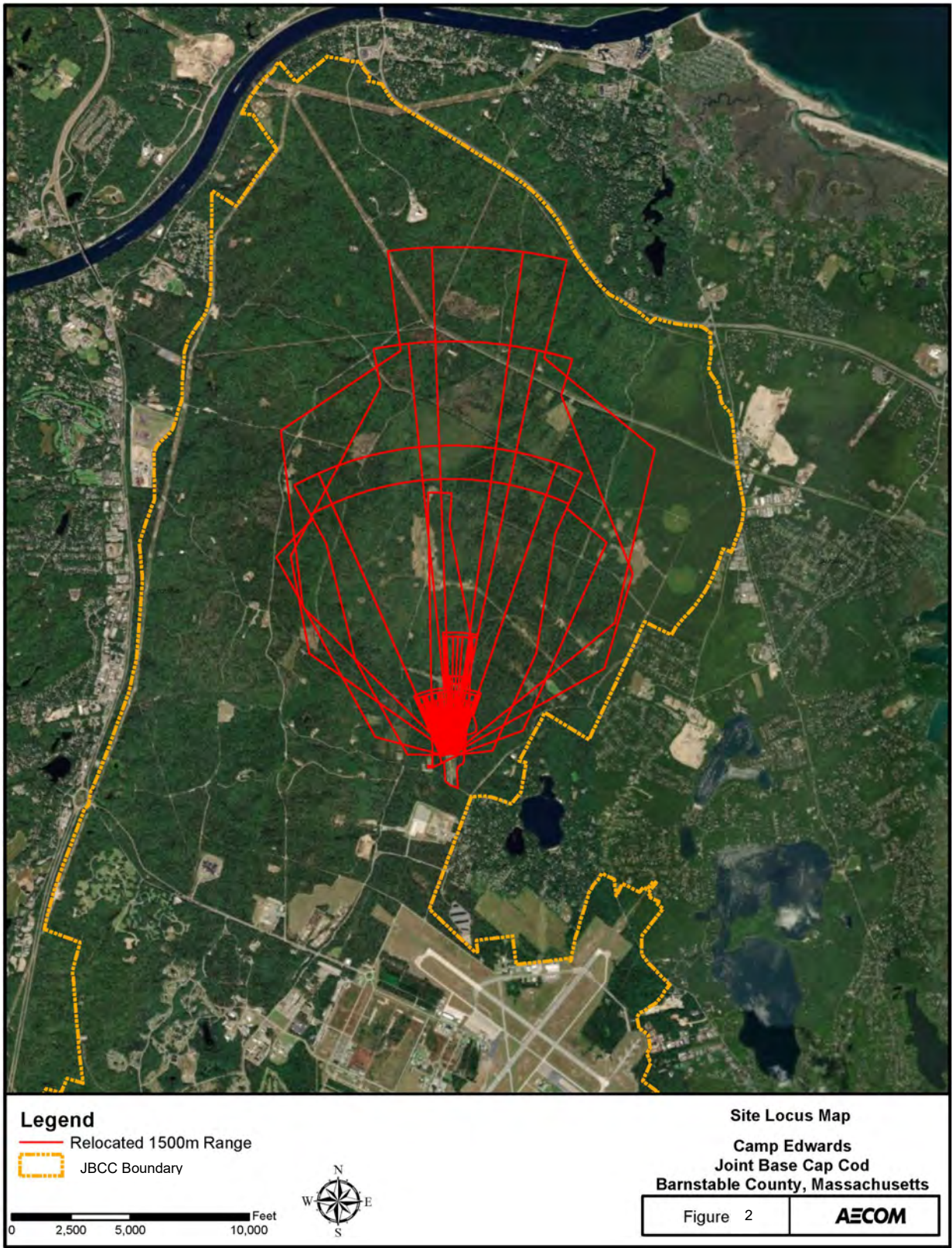


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7 August 2019

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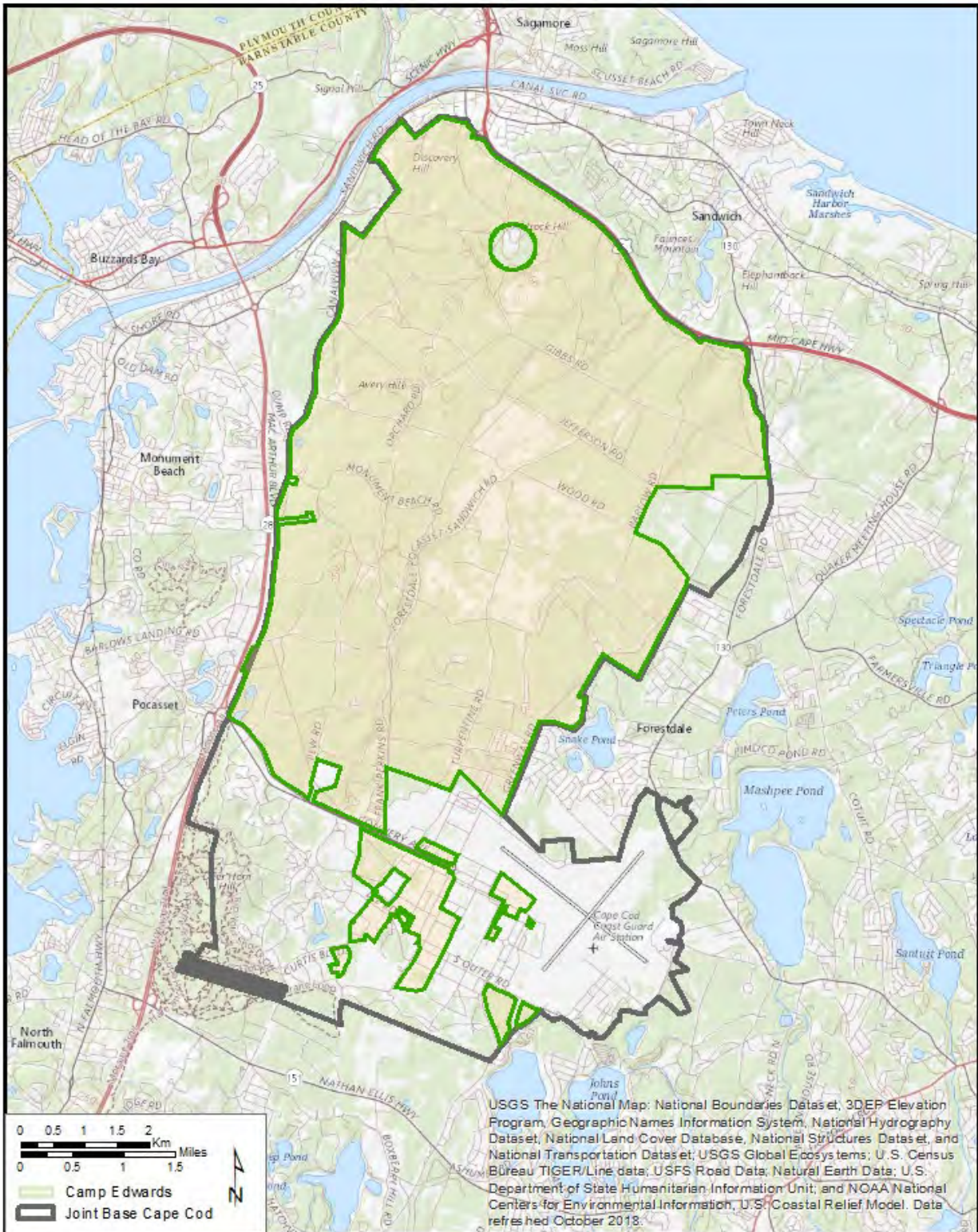


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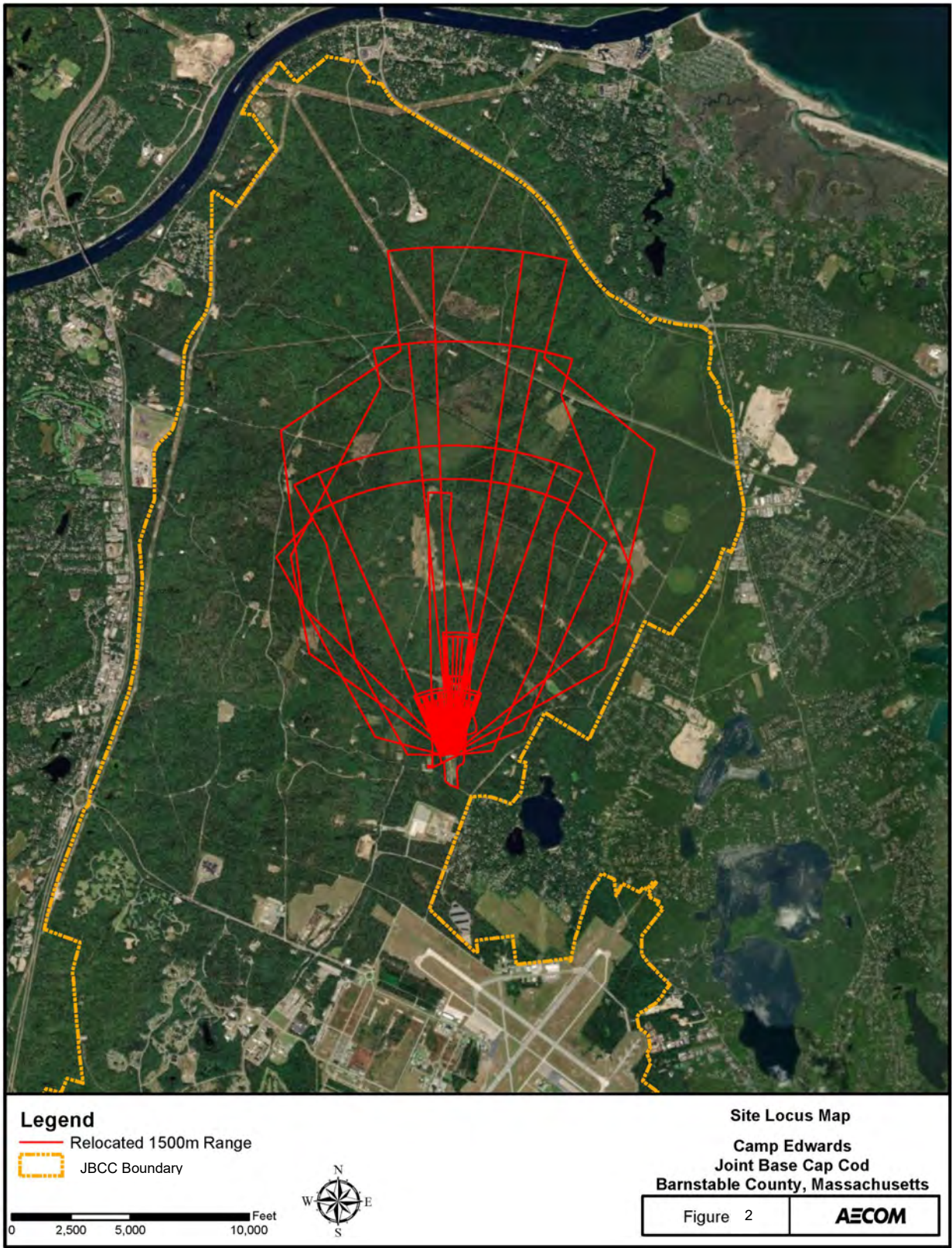


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Sincerely,



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Keith.j.driscoll.nfg@mail.mil
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Please send responses to:

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Camp Edwards and Joint Base Cape Cod Barnstable County, Massachusetts

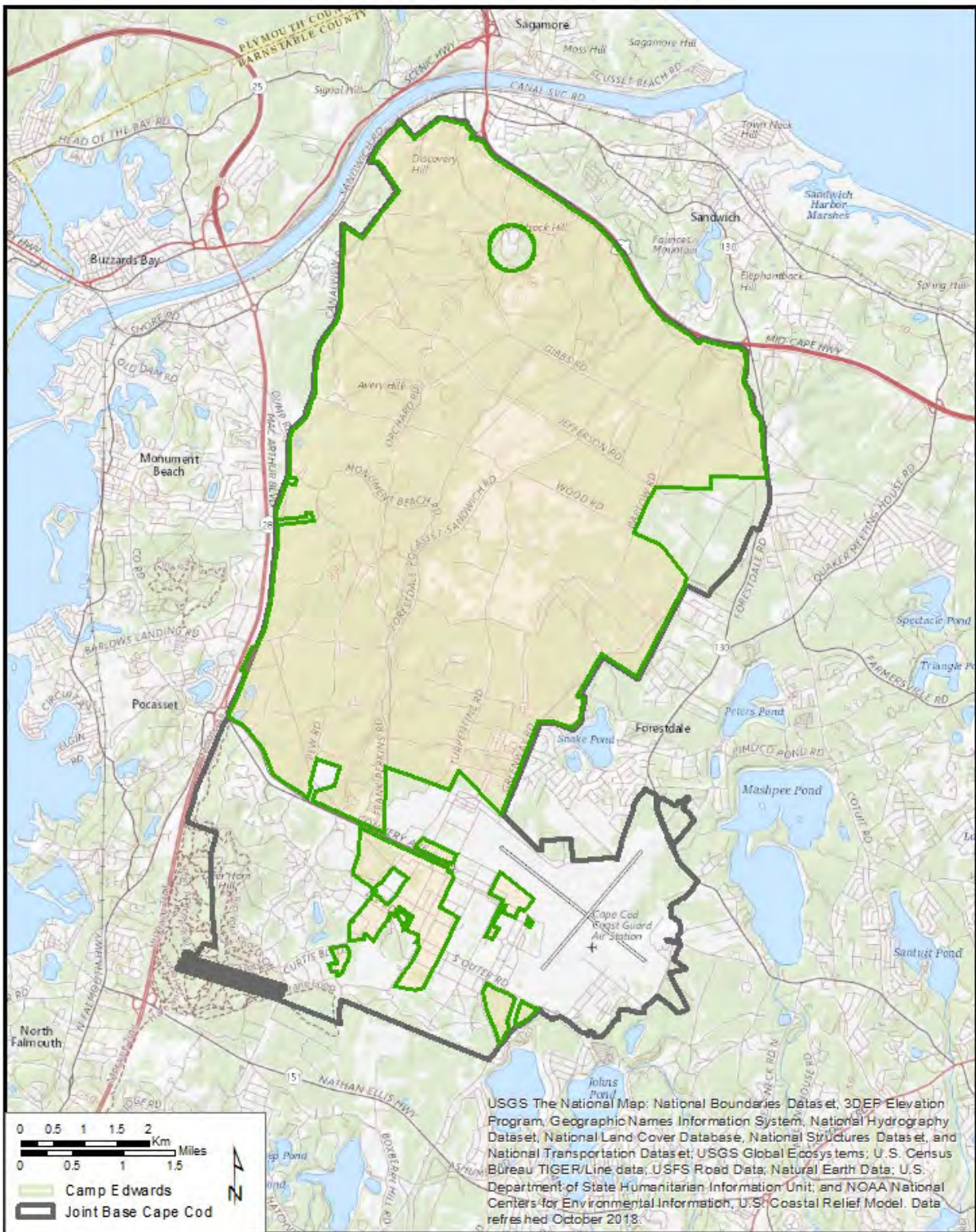


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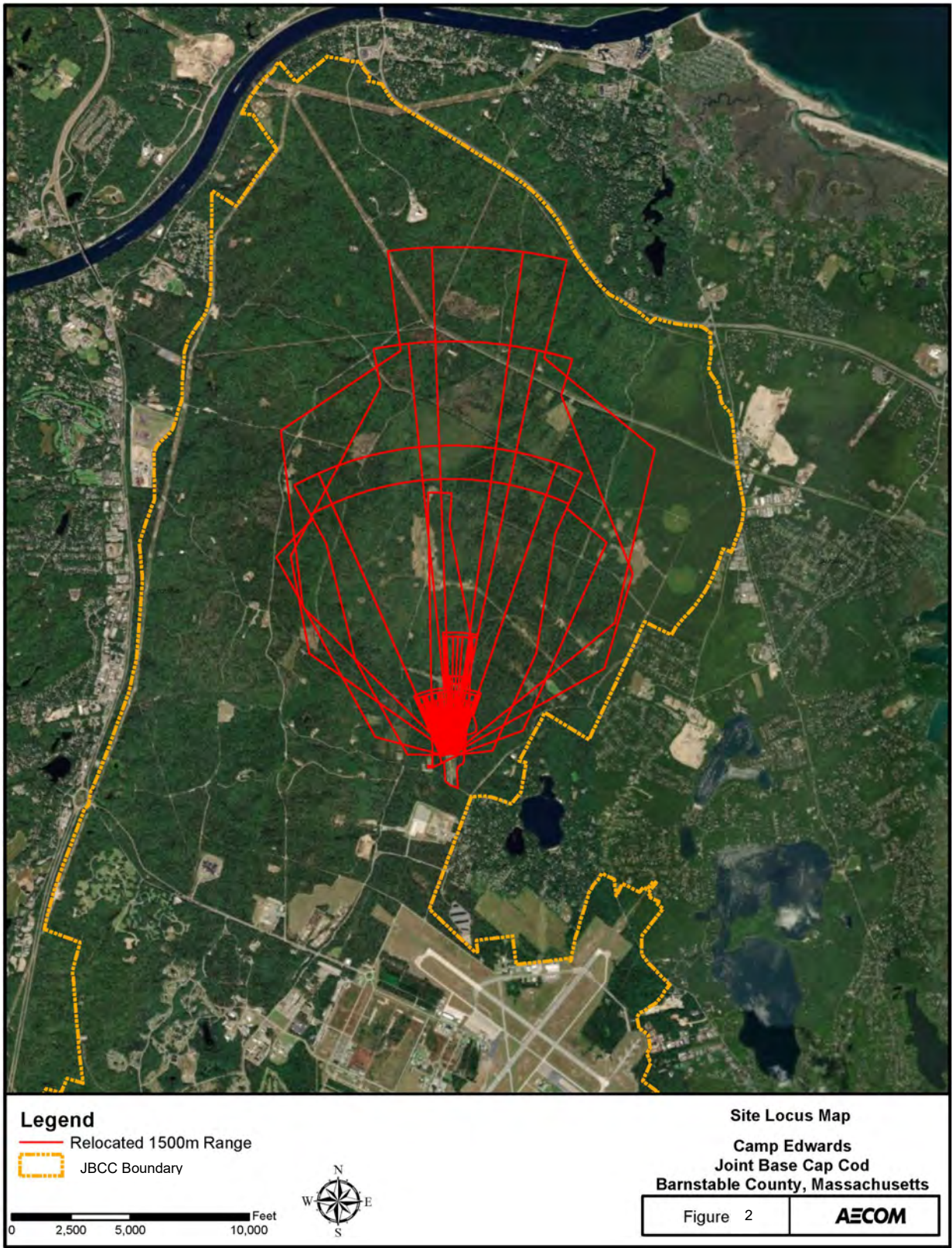


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7 August 2019

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Attn: Col. William M. Conde
District Engineer, Commander

RE: Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) for the Environmental Assessment (EA) for the Multi-Purpose Machine Gun Range, Camp Edwards, Massachusetts

Col Conde:

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Construction of a MPMG Range will provide MAARNG soldiers a modernized small arms training venue to efficiently accomplish mission training to include weapons qualification requirements in a manner that protects both human health and the environment.

The proposed improvements would occur at the existing Known Distance (KD) Range. The KD Range is one of the small arms ranges within Camp Edwards Training Site as shown on **Figure 2**. The parcel is currently leased from the Commonwealth of Massachusetts by the Department of the Army, which in turn licenses the land to the MAARNG.

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The project proposal includes a process for selection of pollution prevention strategies and best management practices through the joint coordinated review efforts of the Environmental Management Commission, the United States Environmental Protection Agency and the Massachusetts Department of Environmental Protection.

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This EA provides a full comparative analysis of the following three alternatives:

- **Alternative 1: Preferred Project Alternative** – This alternative will implement the proposed project by constructing an eight lane MPMG Range at the existing KD Range. The range footprint would consist of eight 800 meters long lanes with a width of 25 meters at the firing line to a width of 100 meters at a distance of 800 meters. The two middle lanes (Lanes 5 and 6) will be an additional 700 meters in length extending to a total overall distance of 1,500 meters for future .50 caliber usage. The extension of the .50 caliber lanes will be constructed at a future date. To accommodate the MPMG range footprint approximately 97 acres of additional ground disturbance/tree clearing is required.
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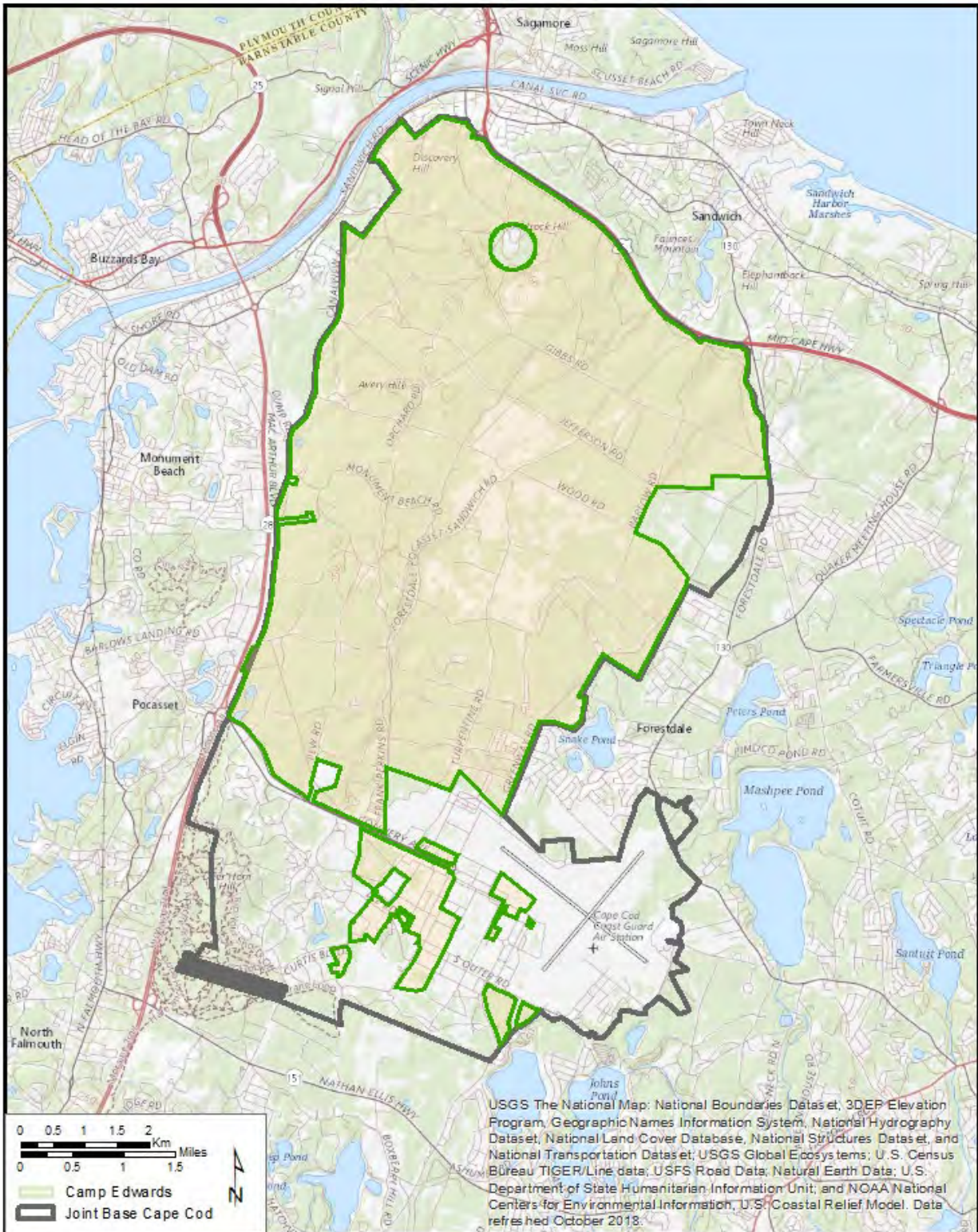


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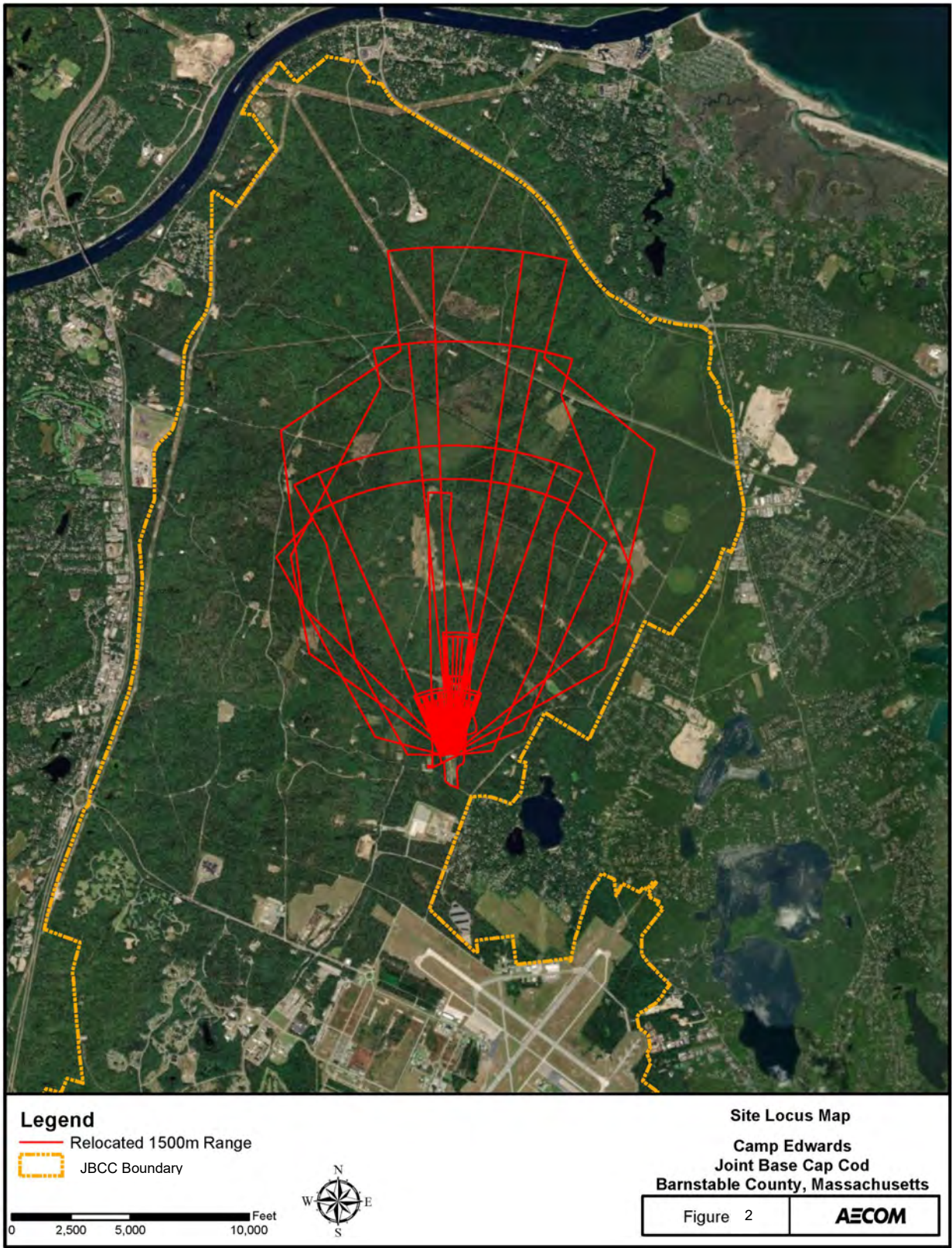


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7 August 2019

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451 West Street
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Attn: Nicole Viars, Acting State Conservationist

RE: Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) for the Environmental Assessment (EA) for the Multi-Purpose Machine Gun Range, Camp Edwards, Massachusetts

Dear Ms. Viars:

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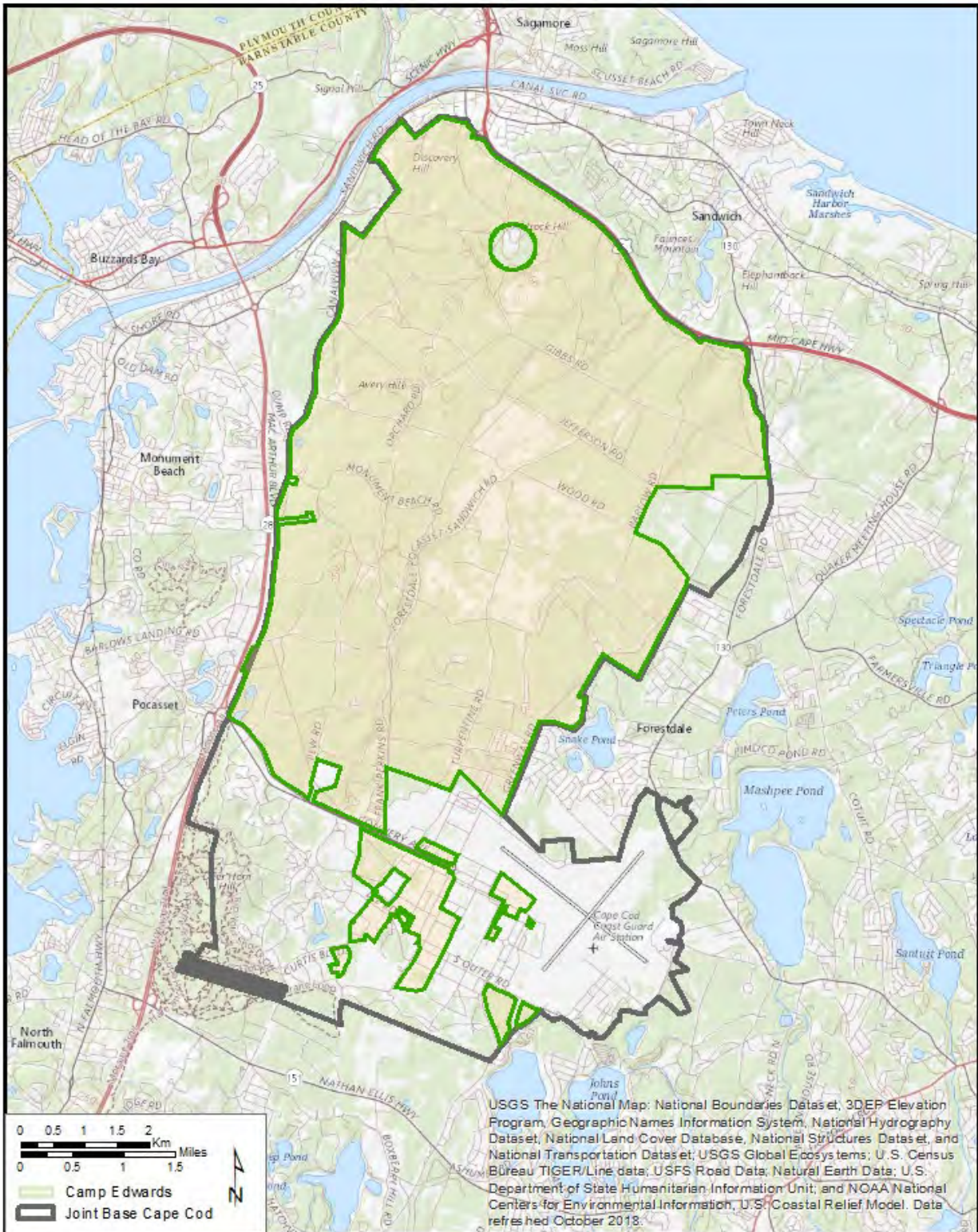
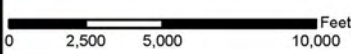


FIGURE 1.



Legend

- Relocated 1500m Range
- JBCC Boundary



Site Locus Map
Camp Edwards
Joint Base Cap Cod
Barnstable County, Massachusetts

Figure 2



FIGURE 2.

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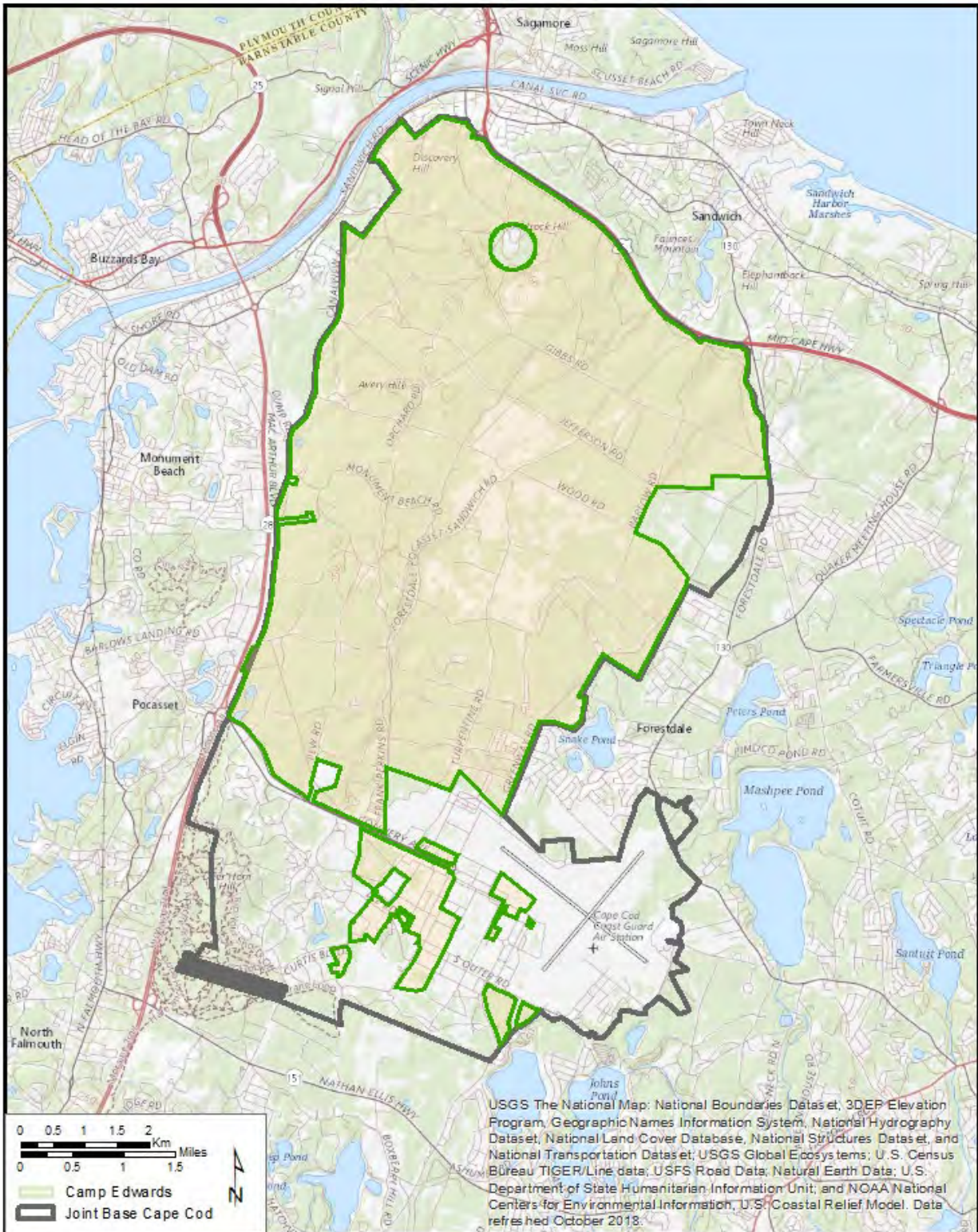


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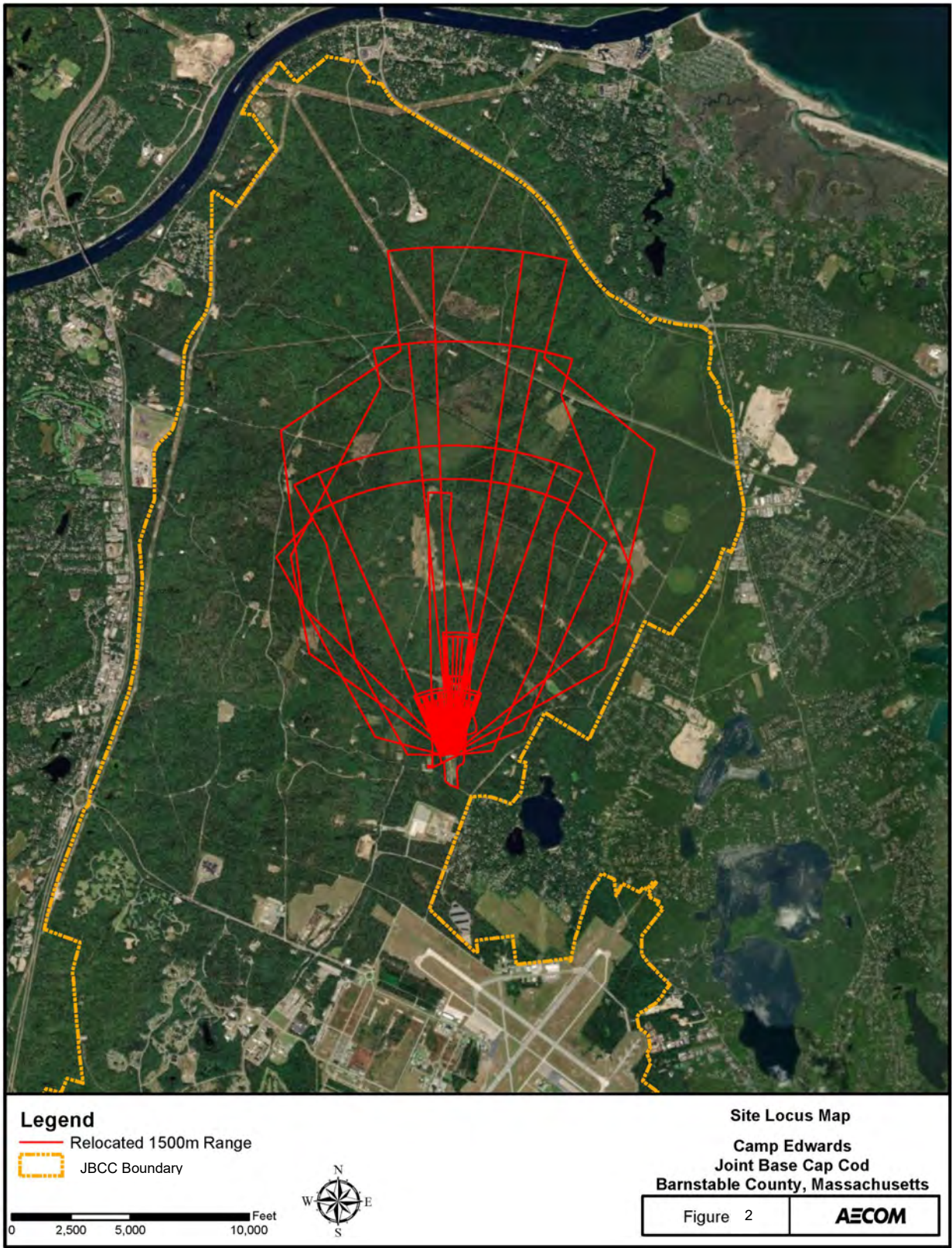


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Attn: John Scannell, Director

Massachusetts Historical Commission
State Historic Preservation Officer
220 Morrissey Boulevard
Boston, MA 02125
Attn: Brona Simon, Executive Director

Executive Office of Energy and Environmental
Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2524
Attn: Katie Theoharides, Executive Secretary

Cape Cod Conservation District
303 Main Street
W. Yarmouth, MA 02673

Department of Natural Resources Conservation
University of Massachusetts, Amherst
205 Holdsworth Way
Amherst, MA 01003-9285

Environmental Management Commission
Building 1204 West Inner Road
Camp Edwards, MA 02542-5003

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Town of Falmouth
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Stockbridge - Munsee Tribe of Mohican,
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Bowler, WI 54416
Attn: Sherry White, Tribal Historic Preservation
Manager/NAGPRA

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Cape Cod Commission
P.O. Box 226
Barnstable, MA 02630
Attn: Kristy Senatori, Executive Director
Attn: Jonathan Idman, Chief Regulatory Officer



DEPARTMENTS OF THE ARMY AND THE AIR FORCE
JOINT FORCE HEADQUARTERS
MASSACHUSETTS NATIONAL GUARD
OFFICE OF THE ADJUTANT GENERAL
2 RANDOLPH ROAD
HANSCOM AFB, MA 01731-3001

7 August 2019

United States Fish & Wildlife Service
Office of the Regional Director
300 Westgate Center Drive
Hadley, MA 01035-9589
Attn: Wendi Weber, Regional Director

RE: Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) for the Environmental Assessment (EA) for the Multi-Purpose Machine Gun Range, Camp Edwards, Massachusetts

Dear Ms. Weber:

The Massachusetts Army National Guard (MAARNG) is preparing environmental documentation for the proposed construction and operation of a Multi-Purpose Machine Gun Range (MPMG) at Camp Edwards, Massachusetts (**Figure 1**).

Construction of a MPMG Range will provide MAARNG soldiers a modernized small arms training venue to efficiently accomplish mission training to include weapons qualification requirements in a manner that protects both human health and the environment.

The proposed improvements would occur at the existing Known Distance (KD) Range. The KD Range is one of the small arms ranges within Camp Edwards Training Site as shown on **Figure 2**. The parcel is currently leased from the Commonwealth of Massachusetts by the Department of the Army, which in turn licenses the land to the MAARNG.

This project entails the siting and development of range specific engineered structures such as enhanced soil berms behind each target to accomplish to the maximum extent practicable metal recovery and recycling, prevention of fragmentation and ricochets, and prevention of sub-surface percolation of residue associated with the range operations.

The project proposal includes a process for selection of pollution prevention strategies and best management practices through the joint coordinated review efforts of the Environmental Management Commission, the United States Environmental Protection Agency and the Massachusetts Department of Environmental Protection.

An Environmental Assessment (EA) is being prepared under the provisions of, and in accordance with, the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 *et seq.*), the Council of Environmental Quality [CEQ] Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), 32 CFR 651 (*Environmental Effects of Army Actions*) and the National Guard Bureau (NGB) *NEPA Handbook – Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with National Environmental Policy Act of 1969*.

This EA provides a full comparative analysis of the following three alternatives:

- **Alternative 1: Preferred Project Alternative** – This alternative will implement the proposed project by constructing an eight lane MPMG Range at the existing KD Range. The range footprint would consist of eight 800 meters long lanes with a width of 25 meters at the firing line to a width of 100 meters at a distance of 800 meters. The two middle lanes (Lanes 5 and 6) will be an additional 700 meters in length extending to a total overall distance of 1,500 meters for future .50 caliber usage. The extension of the .50 caliber lanes will be constructed at a future date. To accommodate the MPMG range footprint approximately 97 acres of additional ground disturbance/tree clearing is required.
- **Alternative 2: Southerly Location Alternative** – This alternative would implement the Proposed Action at a more southerly location at the KD Range. The construction would fulfill the assigned mission requirements but would result in greater impacts, specifically with noise.
- **Alternative 3: No-Action Alternative** – This alternative would not implement the Proposed Action and would allow the existing training and operations to continue without an MPMG Range. Units would travel to either New York, New Jersey, or Vermont to qualify on the nearest MPMG Range.

The MAARNG is currently identifying environmental resources, issues, and constraints associated with the proposed project area, as identified above, in order to effectively assess potential environmental impacts associated with the proposed action. The MAARNG is requesting baseline information regarding any concern that your Agency may have as related to the potential environmental issues at, or in the vicinity of, the proposed action. Any information your Agency can, or would like to, provide about the vicinity of the sites would be appreciated.

If you are aware of other individuals, organizations, or resource agencies that may have additional environmental information or other pertinent knowledge that may assist us in preparing the EA, please contact us or forward this letter for their review, and include any returned comments with your response. **Attachment 1** provides a list of agencies/offices with which consultation has been initiated.

We look forward to your participation in this NEPA review process. Your response on or before 6 September 2019 will enable us to complete this phase of the project within the scheduled time frame.

If you have any questions concerning this request, please do not hesitate to contact myself or our consultant, Kathryn Barnicle at AECOM at 508-833-6953 or the mailing address listed below. If preferable, you may e-mail your response to kathryn.barnicle@aecom.com.

Sincerely,



Keith J. Driscoll
 NEPA/MEPA Manager
 Massachusetts National Guard
Keith.j.driscoll.nfg@mail.mil
 339-202-3980

Please send responses to:

Kathryn Barnicle
 AECOM
 9 Jonathan Bourne Drive
 Pocasset, MA 02559
Kathryn.barnicle@aecom.com
 508-833-6953

Camp Edwards and Joint Base Cape Cod Barnstable County, Massachusetts

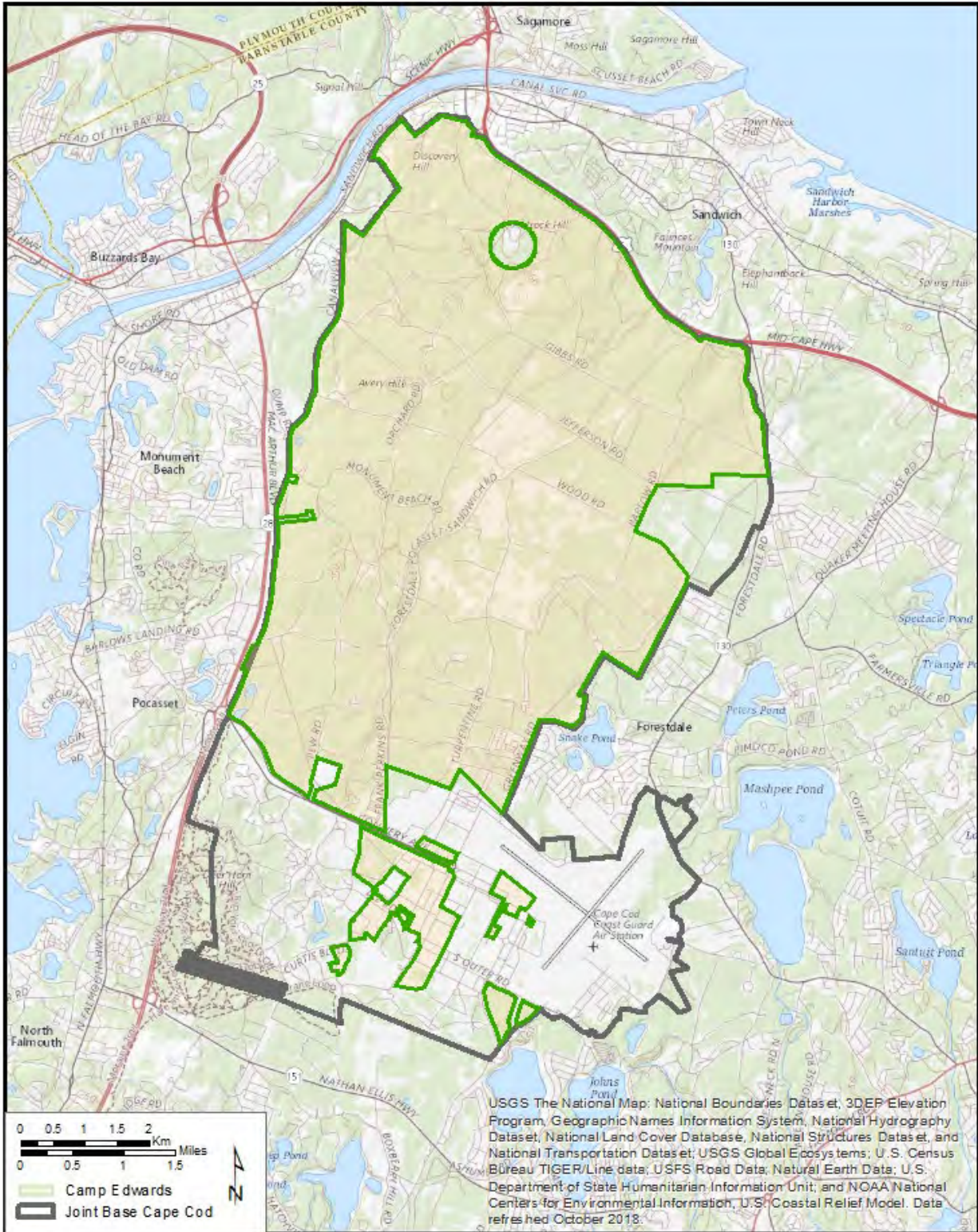


FIGURE 1.



Legend

- Relocated 1500m Range
- JBCC Boundary

0 2,500 5,000 10,000 Feet



Site Locus Map
 Camp Edwards
 Joint Base Cap Cod
 Barnstable County, Massachusetts

Figure 2



FIGURE 2.

ATTACHMENT 1
CONSULTATION INITIATED WITH THE FOLLOWING AGENCIES AND INDIVIDUALS

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Attn: Deborah Szaro, Regional Administrator

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300 Westgate Center Drive
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Attn: Wendi Weber, Regional Director

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Attn: Martin Suuberg, Commissioner

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Attn: Stephanie Moura, Division Director

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W13447 Camp 14 Road
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Attn: Sherry White, Tribal Historic Preservation
Manager/NAGPRA

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P.O. Box 226
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Attn: Kristy Senatori, Executive Director
Attn: Jonathan Idman, Chief Regulatory Officer



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2 RANDOLPH ROAD
HANSCOM AFB, MA 01731-3001

7 August 2019

Stockbridge - Munsee Community, Band of Mohican Indians of Wisconsin
W13447 Camp 14 Road
Bowler, WI 54416
Attn: Shannon Holsey, President

RE: Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) for the Environmental Assessment (EA) for the Multi-Purpose Machine Gun Range, Camp Edwards, Massachusetts

Dear Ms. Holsey:

The Massachusetts Army National Guard (MAARNG) is preparing environmental documentation for the proposed construction and operation of a Multi-Purpose Machine Gun Range (MPMG) at Camp Edwards, Massachusetts (**Figure 1**).

Construction of a MPMG Range will provide MAARNG soldiers a modernized small arms training venue to efficiently accomplish mission training to include weapons qualification requirements in a manner that protects both human health and the environment.

The proposed improvements would occur at the existing Known Distance (KD) Range. The KD Range is one of the small arms ranges within Camp Edwards Training Site as shown on **Figure 2**. The parcel is currently leased from the Commonwealth of Massachusetts by the Department of the Army, which in turn licenses the land to the MAARNG.

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The project proposal includes a process for selection of pollution prevention strategies and best management practices through the joint coordinated review efforts of the Environmental Management Commission, the United States Environmental Protection Agency and the Massachusetts Department of Environmental Protection.

An Environmental Assessment (EA) is being prepared under the provisions of, and in accordance with, the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 *et seq.*), the Council of Environmental Quality [CEQ] Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), 32 CFR 651 (*Environmental Effects of Army Actions*) and the National Guard Bureau (NGB) *NEPA Handbook – Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with National Environmental Policy Act of 1969*. The MAARNG is also conducting a review of this project to comply with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR Part 800.

This EA provides a full comparative analysis of the following three alternatives:

- **Alternative 1: Preferred Project Alternative** – This alternative will implement the proposed project by constructing an eight lane MPMG Range at the existing KD Range. The range footprint would consist of eight 800 meters long lanes with a width of 25 meters at the firing line to a width of 100 meters at a distance of 800 meters. The two middle lanes (Lanes 5 and 6) will be an additional 700 meters in length extending to a total overall distance of 1,500 meters for future .50 caliber usage. The extension of the .50 caliber lanes will be constructed at a future date. To accommodate the MPMG range footprint approximately 97 acres of additional ground disturbance/tree clearing is required.
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The MAARNG is currently identifying environmental resources, issues, and constraints associated with the proposed project area, as identified above, in order to effectively assess potential environmental impacts associated with the proposed action. The MAARNG is requesting baseline information regarding any concern that your Agency may have as related to the potential environmental issues at, or in the vicinity of, the proposed action. Any information your Agency can, or would like to, provide about the vicinity of the sites would be appreciated.

Review of the Camp Edwards GIS layers for cultural resources indicates that no previously recorded archaeological site, tribal areas or historic buildings lie within the parcel. The MPMG Range is primarily located at the KD Range with cultural grasslands and the adjacent wooded area where vegetation consists of pitch pine scrub oak communities and pitch pine oak forests. Based on the prehistoric and historic archaeological sensitivity maps provided in the PAL's report Intensive (locational) Archaeological Survey, Massachusetts Military Reservation, Regional Water Supply Project, Cape Cod, Massachusetts (Fragola and Ingham 2000), and updated in September 2009 with the Final Integrated Cultural Resources management Plan Revisions for Sites and Training Installations of the MAARNG (Engineering-Environmental Management, Inc.) the Parcel lies in an area categorized as having low sensitivity for archaeological sites. In addition, a review of the site was performed in 2016 with no finds reported. No historic buildings or structures appear to be present within the viewshed of the proposed project.

Based on our review of the project area of potential effects and the archaeological sensitivity map, the MAARNG considers the proposed project would have no effect on archaeological or architectural resource. An intensive (locational) archaeological survey is not recommended prior to construction.

If you are aware of other individuals, organizations, or resource agencies that may have additional environmental information or other pertinent knowledge that may assist us in preparing the EA, please contact us or forward this letter for their review, and include any returned comments with your response. **Attachment 1** provides a list of agencies/offices with which consultation has been initiated.

We look forward to your participation in this NEPA review process. Your response on or before 6 September 2019 will enable us to complete this phase of the project within the scheduled time frame.

If you have any questions concerning this request, please do not hesitate to contact myself or our consultant, Kathryn Barnicle at AECOM at 508-833-6953 or the mailing address listed below. If preferable, you may e-mail your response to kathryn.barnicle@aecom.com.

Sincerely,



Keith J. Driscoll
NEPA/MEPA Manager
Massachusetts National Guard
Keith.j.driscoll.nfg@mail.mil
339-202-3980

Please send responses to:

Kathryn Barnicle
AECOM
9 Jonathan Bourne Drive
Pocasset, MA 02559
Kathryn.barnicle@aecom.com
508-833-6953

Camp Edwards and Joint Base Cape Cod Barnstable County, Massachusetts

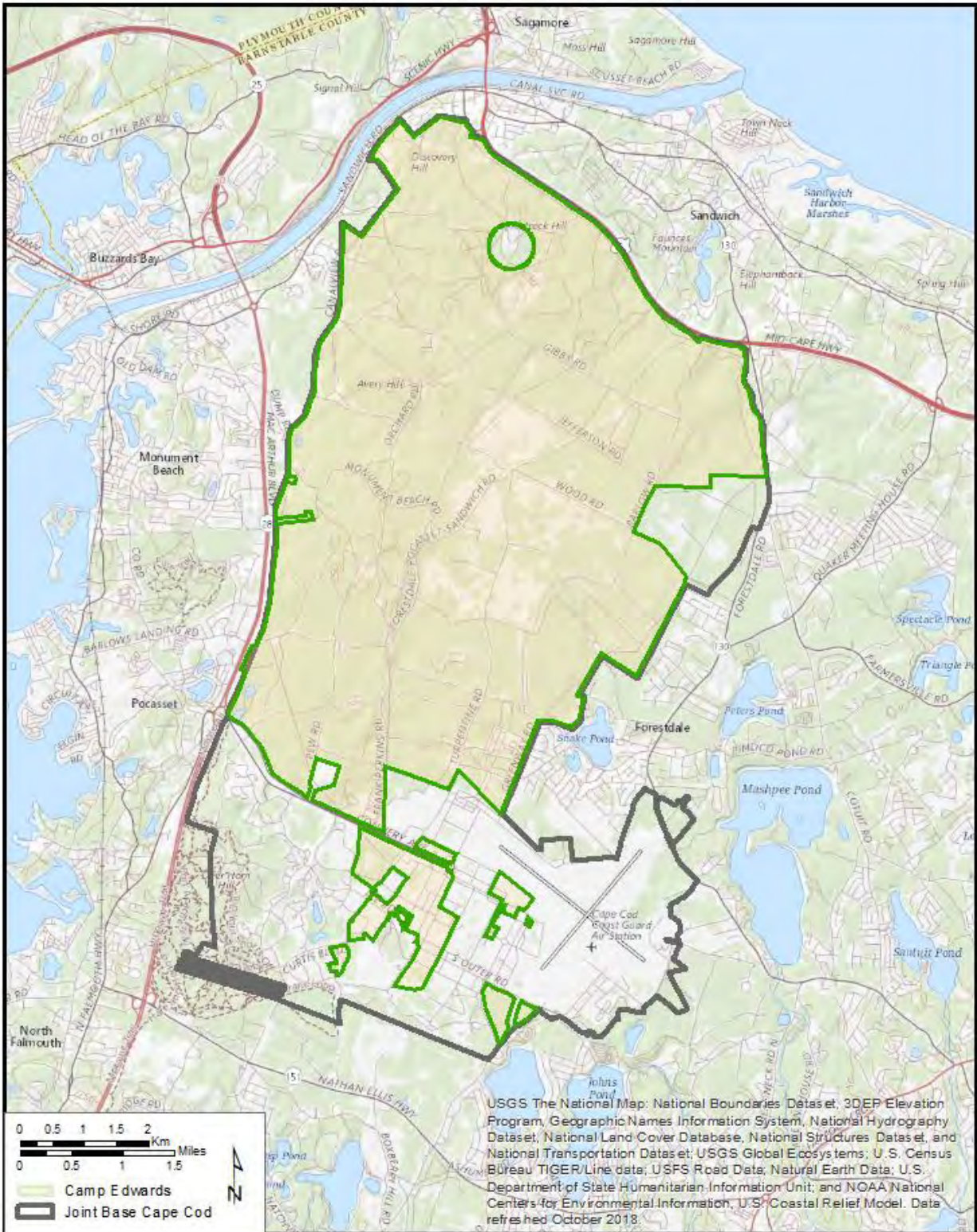
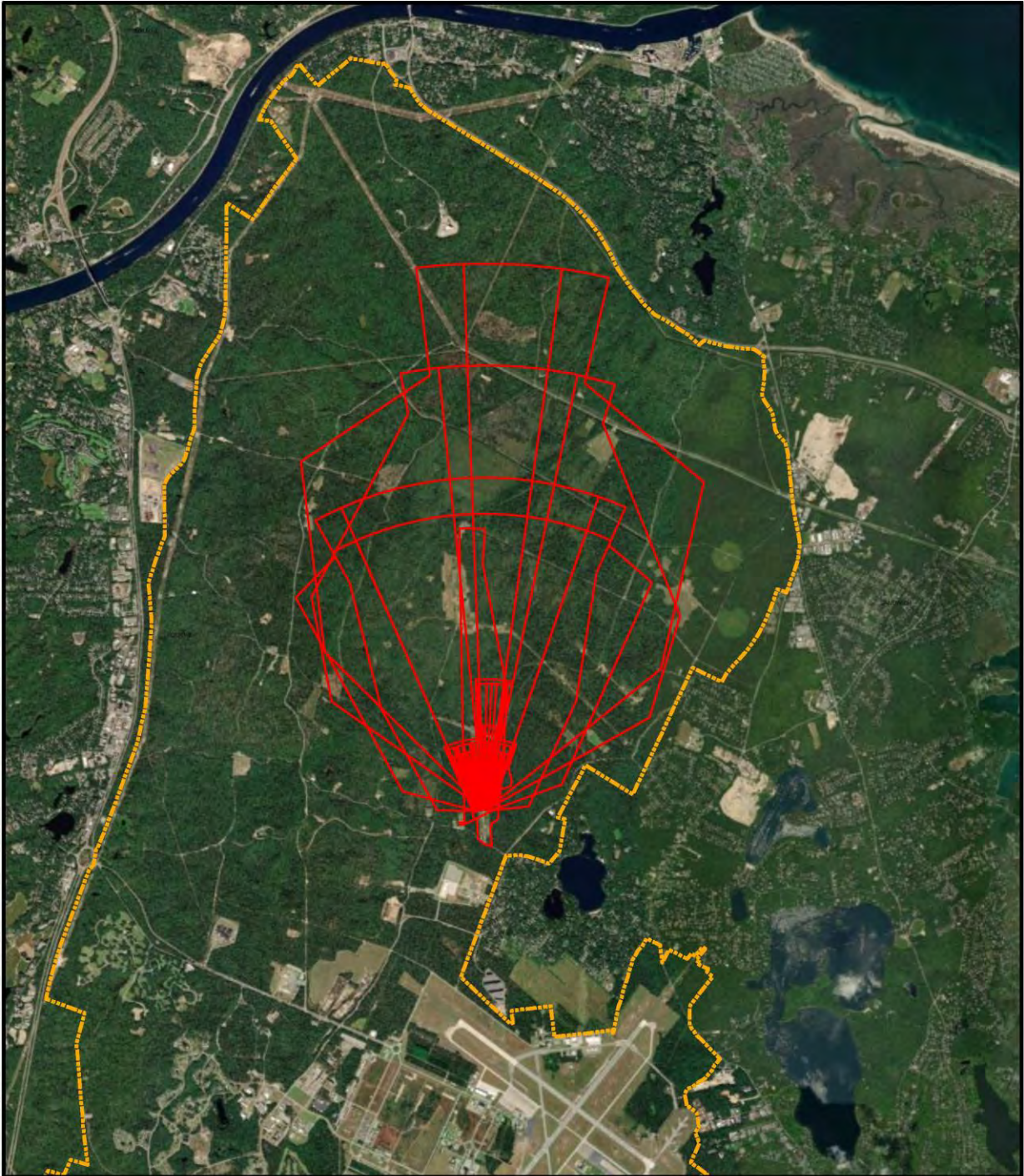
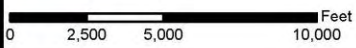


FIGURE 1.



Legend

- Relocated 1500m Range
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Site Locus Map
 Camp Edwards
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FIGURE 2.

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2 RANDOLPH ROAD
HANSCOM AFB, MA 01731-3001

7 August 2019

Wampanoag Tribe of Gay Head (Aquinnah)
20 Black Brook Road
Aquinnah, MA 02535-1546
Attn: Cheryl Andrews-Maltais, Chairwoman

RE: Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) for the Environmental Assessment (EA) for the Multi-Purpose Machine Gun Range, Camp Edwards, Massachusetts

Dear Ms. Andrew-Maltais:

The Massachusetts Army National Guard (MAARNG) is preparing environmental documentation for the proposed construction and operation of a Multi-Purpose Machine Gun Range (MPMG) at Camp Edwards, Massachusetts (**Figure 1**).

Construction of a MPMG Range will provide MAARNG soldiers a modernized small arms training venue to efficiently accomplish mission training to include weapons qualification requirements in a manner that protects both human health and the environment.

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The project proposal includes a process for selection of pollution prevention strategies and best management practices through the joint coordinated review efforts of the Environmental Management Commission, the United States Environmental Protection Agency and the Massachusetts Department of Environmental Protection.

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This EA provides a full comparative analysis of the following three alternatives:

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Based on our review of the project area of potential effects and the archaeological sensitivity map, the MAARNG considers the proposed project would have no effect on archaeological or architectural resource. An intensive (locational) archaeological survey is not recommended prior to construction.

In accordance with the Memorandum of Understanding between the MAARNG and the Wampanoag Tribe of Gay Head – Aquinnah, the MAARNG is requesting the Tribal Historical Preservation Office (THPO) comment on this proposed undertaking.

If you are aware of other individuals, organizations, or resource agencies that may have additional environmental information or other pertinent knowledge that may assist us in preparing the EA, please contact us or forward this letter for their review, and include any returned comments with your response. **Attachment 1** provides a list of agencies/offices with which consultation has been initiated.

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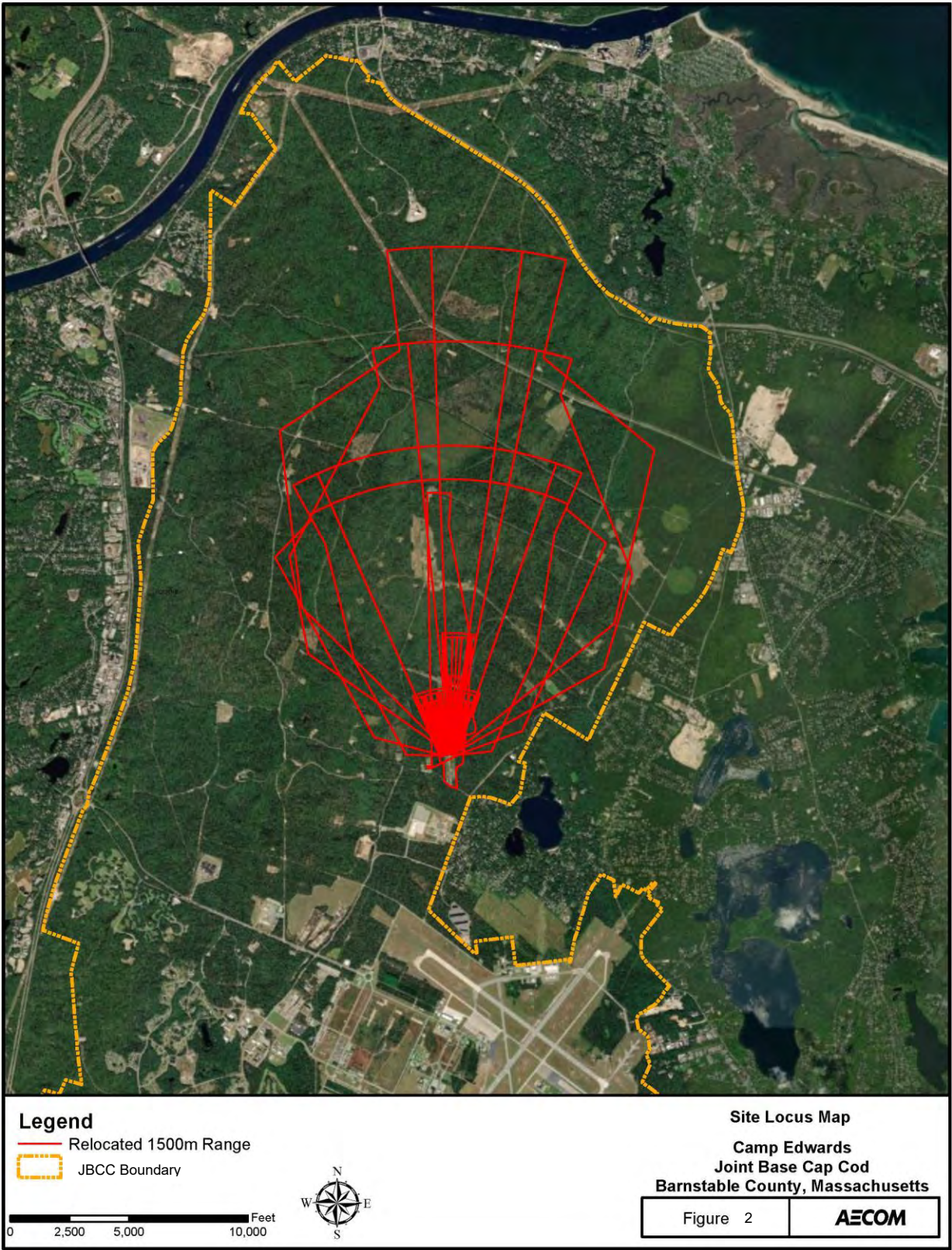


FIGURE 2.



DEPARTMENTS OF THE ARMY AND THE AIR FORCE
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7 August 2019

Mashpee Wampanoag Tribe
P.O. Box 1048
483 Great Neck Road South
Mashpee, MA 02649
Attn: Cedric Cromwell, Chairman

RE: Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) for the Environmental Assessment (EA) for the Multi-Purpose Machine Gun Range, Camp Edwards, Massachusetts

Dear Mr. Cromwell:

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An Environmental Assessment (EA) is being prepared under the provisions of, and in accordance with, the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 *et seq.*), the Council of Environmental Quality [CEQ] Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), 32 CFR 651 (*Environmental Effects of Army Actions*) and the National Guard Bureau (NGB) *NEPA Handbook – Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with National Environmental Policy Act of 1969*. The MAARNG is also conducting a review of this project to comply with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR Part 800.

This EA provides a full comparative analysis of the following three alternatives:

- **Alternative 1: Preferred Project Alternative** – This alternative will implement the proposed project by constructing an eight lane MPMG Range at the existing KD Range. The range footprint would consist of eight 800 meters long lanes with a width of 25 meters at the firing line to a width of 100 meters at a distance of 800 meters. The two middle lanes (Lanes 5 and 6) will be an additional 700 meters in length extending to a total overall distance of 1,500 meters for future .50 caliber usage. The extension of the .50 caliber lanes will be constructed at a future date. To accommodate the MPMG range footprint approximately 97 acres of additional ground disturbance/tree clearing is required.
- **Alternative 2: Southerly Location Alternative** – This alternative would implement the Proposed Action at a more southerly location at the KD Range. The construction would fulfill the assigned mission requirements but would result in greater impacts, specifically with noise.
- **Alternative 3: No-Action Alternative** – This alternative would not implement the Proposed Action and would allow the existing training and operations to continue without an MPMG Range. Units would travel to either New York, New Jersey, or Vermont to qualify on the nearest MPMG Range.

The MAARNG is currently identifying environmental resources, issues, and constraints associated with the proposed project area, as identified above, in order to effectively assess potential environmental impacts associated with the proposed action. The MAARNG is requesting baseline information regarding any concern that your Agency may have as related to the potential environmental issues at, or in the vicinity of, the proposed action. Any information your Agency can, or would like to, provide about the vicinity of the sites would be appreciated.

Review of the Camp Edwards GIS layers for cultural resources indicates that no previously recorded archaeological site, tribal areas or historic buildings lie within the parcel. The MPMG Range is primarily located at the KD Range with cultural grasslands and the adjacent wooded area where vegetation consists of pitch pine scrub oak communities and pitch pine oak forests. Based on the prehistoric and historic archaeological sensitivity maps provided in the PAL's report Intensive (locational) Archaeological Survey, Massachusetts Military Reservation, Regional Water Supply Project, Cape Cod, Massachusetts (Fragola and Ingham 2000), and updated in September 2009 with the Final Integrated Cultural Resources management Plan Revisions for Sites and Training Installations of the MAARNG (Engineering-Environmental Management, Inc.) the Parcel lies in an area categorized as having low sensitivity for archaeological sites. In addition, a review of the site was performed in 2016 with no finds reported. No historic buildings or structures appear to be present within the viewshed of the proposed project.

Based on our review of the project area of potential effects and the archaeological sensitivity map, the MAARNG considers the proposed project would have no effect on archaeological or architectural resource. An intensive (locational) archaeological survey is not recommended prior to construction.

If you are aware of other individuals, organizations, or resource agencies that may have additional environmental information or other pertinent knowledge that may assist us in preparing the EA, please contact us or forward this letter for their review, and include any returned comments with your response. **Attachment 1** provides a list of agencies/offices with which consultation has been initiated.

We look forward to your participation in this NEPA review process. Your response on or before 6 September 2019 will enable us to complete this phase of the project within the scheduled time frame.

If you have any questions concerning this request, please do not hesitate to contact myself or our consultant, Kathryn Barnicle at AECOM at 508-833-6953 or the mailing address listed below. If preferable, you may e-mail your response to kathryn.barnicle@aecom.com.

Sincerely,



Keith J. Driscoll
NEPA/MEPA Manager
Massachusetts National Guard
Keith.j.driscoll.nfg@mail.mil
339-202-3980

Please send responses to:

Kathryn Barnicle
AECOM
9 Jonathan Bourne Drive
Pocasset, MA 02559
Kathryn.barnicle@aecom.com
508-833-6953

Camp Edwards and Joint Base Cape Cod Barnstable County, Massachusetts

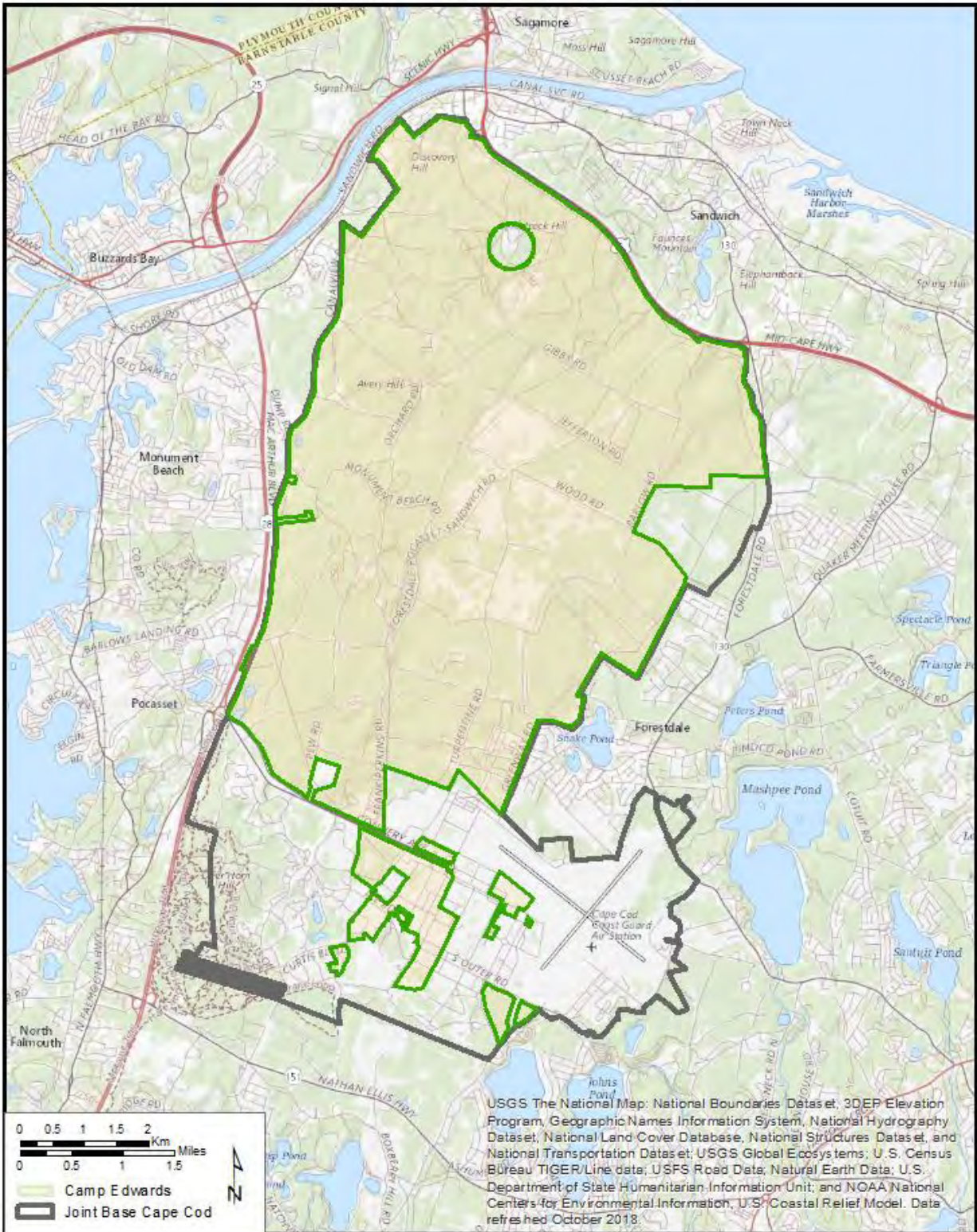


FIGURE 1.

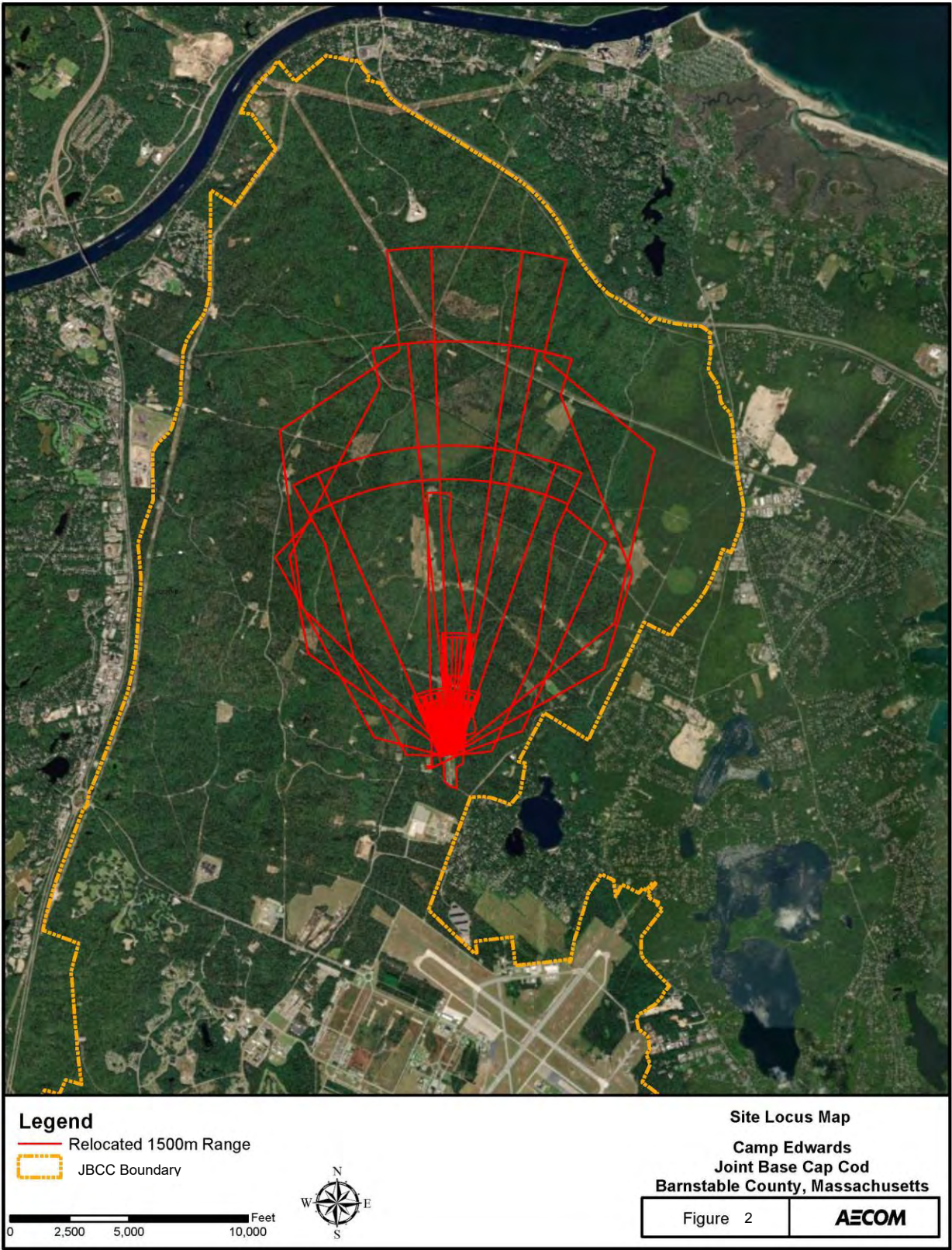


FIGURE 2.

August 16, 2019

Jake McCumber
Massachusetts Army National Guard
Natural Resource Office, Bldg 2808
Camp Edwards MA 02542

RE: Project Location: Camp Edwards, Joint Base Cape Cod
Town: BOURNE
NHESP Tracking No.: 17-37200

To Whom It May Concern:

Thank you for contacting the Natural Heritage and Endangered Species Program of the MA Division of Fisheries & Wildlife (the "Division") for information regarding state-listed rare species in the vicinity of the above referenced site. Based on the information provided, this project site, or a portion thereof, is located **within** *Priority Habitat 490* (PH 490) and *Estimated Habitat 435* (EH 435) as indicated in the *Massachusetts Natural Heritage Atlas* (14th Edition) for the following state-listed rare species:

<u>Scientific name</u>	<u>Common Name</u>	<u>Taxonomic Group</u>	<u>State Status</u>
<i>Scaphiopus holbrookii</i>	Eastern Spadefoot	Amphibian	Threatened
<i>Cicindela purpurea</i>	Purple Tiger Beetle	Beetle	Special Concern
<i>Ammodramus savannarum</i>	Grasshopper Sparrow	Bird	Threatened
<i>Bartramia longicauda</i>	Upland Sandpiper	Bird	Endangered
<i>Caprimulgus vociferus</i>	Eastern Whip-poor-will	Bird	Special Concern
<i>Circus cyaneus</i>	Northern Harrier	Bird	Threatened
<i>Poocetes gramineus</i>	Vesper Sparrow	Bird	Threatened
<i>Abagrotis nefascia</i>	Coastal Heathland Cutworm	Butterflies and Moths	Special Concern
<i>Acronicta albarufa</i>	Barrens Dagger Moth	Butterflies and Moths	Threatened
<i>Callophrys irus</i>	Frosted Elfin	Butterflies and Moths	Special Concern
<i>Catocala herodias gerhardi</i>	Gerhard's Underwing Moth	Butterflies and Moths	Special Concern
<i>Chaetagnela cerata</i>	Waxed Sallow Moth	Butterflies and Moths	Special Concern
<i>Cicinnus melsheimeri</i>	Melsheimer's Sack Bearer	Butterflies and Moths	Threatened
<i>Cingilia catenaria</i>	Chain Dot Geometer	Butterflies and Moths	Special Concern
<i>Cycnia inopinatus</i>	Unexpected Cycnia	Butterflies and Moths	Threatened
<i>Dargida rubripennis</i>	The Pink Streak	Butterflies and Moths	Threatened
<i>Euchlaena madusaria</i>	Sandplain Euchlaena	Butterflies and Moths	Special Concern
<i>Hemaris gracilis</i>	Slender Clearwing Sphinx	Butterflies and Moths	Special Concern
<i>Hemileuca maia</i>	Barrens Buckmoth	Butterflies and Moths	Special Concern
<i>Lycia ypsilon</i>	Pine Barrens Lycia	Butterflies and Moths	Threatened
<i>Metarranthis pilosaria</i>	Coastal Swamp Metarranthis Moth	Butterflies and Moths	Special Concern

<u>Scientific name</u>	<u>Common Name</u>	<u>Taxonomic Group</u>	<u>State Status</u>
<i>Papaipema sulphurata</i>	Water-Willow Borer Moth	Butterflies and Moths	Threatened
<i>Psectraglaea carnosa</i>	Pink Sallow	Butterflies and Moths	Special Concern
<i>Speranza exonerata</i>	Pine Barrens Speranza	Butterflies and Moths	Special Concern
<i>Zale lunifera</i>	Pine Barrens Zale	Butterflies and Moths	Special Concern
<i>Eulimnadia agassizii</i>	Agassiz's Clam Shrimp	Crustacean	Endangered
<i>Enallagma recurvatum</i>	Pine Barrens Bluet	Damselfly	Threatened
<i>Myotis septentrionalis</i>	Northern Long-eared Bat	Mammal	Endangered
<i>Data Sensitive Species*</i>		Plant	Endangered
<i>Eleocharis ovata</i>	Ovate Spike-Sedge	Plant	Endangered
<i>Juncus debilis</i>	Weak Rush	Plant	Endangered
<i>Malaxis bayardii</i>	Bayard's Green Adder's-Mouth	Plant	Endangered
<i>Ophioglossum pusillum</i>	Adder's-Tongue Fern	Plant	Threatened
<i>Rhynchospora torreyana</i>	Torrey's Beak-Sedge	Plant	Endangered
<i>Scleria pauciflora</i>	Papillose Nut-Sedge	Plant	Endangered
<i>Triosteum perfoliatum</i>	Broad Tinker's-Weed	Plant	Endangered
<i>Terrapene carolina</i>	Eastern Box Turtle	Reptile	Special Concern

The species listed above are protected under the Massachusetts Endangered Species Act (MESA) (M.G.L. c. 131A) and its implementing regulations (321 CMR 10.00). State-listed wildlife are also protected under the state's Wetlands Protection Act (WPA) (M.G.L. c. 131, s. 40) and its implementing regulations (310 CMR 10.00). Fact sheets for most state-listed rare species can be found on our website (www.mass.gov/nhesp).

*This species is considered a "Sensitive Species". This species is highly susceptible to collection and is therefore of high concern to Natural Heritage. Information about this species (including presence/absence) cannot be released to anyone (especially including release to third parties or published) unless such release is agreed to in writing by the Natural Heritage Program (See Massachusetts Public Records law: M.G.L. chapter 66 section 17D).

Please note that projects and activities located within Priority and/or Estimated Habitat must be reviewed by the Division for compliance with the state-listed rare species protection provisions of MESA (321 CMR 10.00) and/or the WPA (310 CMR 10.00).

Wetlands Protection Act (WPA)

If the project site is within Estimated Habitat and a Notice of Intent (NOI) is required, then a copy of the NOI must be submitted to the Division so that it is received at the same time as the local conservation commission. If the Division determines that the proposed project will adversely affect the actual Resource Area habitat of state-protected wildlife, then the proposed project may not be permitted (310 CMR 10.37, 10.58(4)(b) & 10.59). In such a case, the project proponent may request a consultation with the Division to discuss potential project design modifications that would avoid adverse effects to rare wildlife habitat.

A streamlined joint MESA/WPA review process is available. When filing a Notice of Intent (NOI), the applicant may file concurrently under the MESA on the same NOI form and qualify for a 30-day

streamlined joint review. For a copy of the NOI form, please visit the MA Department of Environmental Protection's website: <https://www.mass.gov/how-to/wpa-form-3-wetlands-notice-of-intent>.

MA Endangered Species Act (MESA)

If the proposed project is located within Priority Habitat and is not exempt from review (see 321 CMR 10.14), then project plans, a fee, and other required materials must be sent to Natural Heritage Regulatory Review to determine whether a probable Take under the MA Endangered Species Act would occur (321 CMR 10.18). Please note that all proposed and anticipated development must be disclosed, as MESA does not allow project segmentation (321 CMR 10.16). For a MESA filing checklist and additional information please see our website: <https://www.mass.gov/regulatory-review>.

We recommend that rare species habitat concerns be addressed during the project design phase prior to submission of a formal MESA filing, as avoidance and minimization of impacts to rare species and their habitats is likely to expedite endangered species regulatory review.

This evaluation is based on the most recent information available in the Natural Heritage database, which is constantly being expanded and updated through ongoing research and inventory. If the purpose of your inquiry is to generate a species list to fulfill the federal Endangered Species Act (16 U.S.C. 1531 et seq.) information requirements for a permit, proposal, or authorization of any kind from a federal agency, we recommend that you contact the National Marine Fisheries Service at (978)281-9328 and use the U.S. Fish and Wildlife Service's Information for Planning and Conservation website (<https://ecos.fws.gov/ipac>). If you have any questions regarding this letter please contact Emily Holt, Endangered Species Review Assistant, at (508) 389-6385.

Sincerely,



Everose Schlüter, Ph.D.
Assistant Director



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

OFFICE OF THE
REGIONAL ADMINISTRATOR

September 5, 2019

Keith J. Driscoll
NEPA/MEPA Manager
Massachusetts National Guard
2 Randolph Road
Hanscom AFB, MA 01731-3001

RE: Scoping Comments for the Environmental Assessment for the Multi-Purpose Machine Gun Range, Camp Edwards, Massachusetts

Dear Mr. Driscoll:

This letter is provided in response to your August 7th request for input regarding key issues that should be addressed in the Environmental Assessment (EA) for the proposed Multi-Purpose Machine Gun Range at Camp Edwards. According to your letter the project will create a modern small arms range that will support mission training and allow soldiers to meet weapons qualifications requirements. The range is proposed on land leased from the Commonwealth of Massachusetts on an existing area referred to as the Known Distance (KD) Range.

We appreciate the opportunity to comment in advance of the preparation of the EA for the project. Our comments below provide background information and suggestions regarding potential environmental issues relevant to the proposed action that we recommend be considered as you work to develop the EA.

The KD Range has been subject to investigation and cleanup under Section 1431(a) of the Safe Drinking Water Act (SDWA), 42 USC § 300i(a), as amended, and two Administrative Orders (AOs) concerning response actions issued thereunder (U.S. Environmental Protection Agency Region 1 (EPA) AO SDWA 1-97-1019 (AO1) and AO SDWA-1-2000-0014 (AO3)). The Administrative Record containing key supporting documents from the investigation and cleanup is available at the Impact Area Groundwater Study Program Office (IAGWSPO), 1807 West Outer Road, Camp Edwards, MA. Mr. Shawn Cody is the point of contact for that information and he can be reached at 339-202-9370.

The final cleanup remedy under AO3 for the KD Range is contained in two (2) separate Decision Documents (DD). The February 2019 Training Areas Operable Unit DD (KD West is one of 36 sites or locations contained within this DD) presents the selected remedy for the KD West Range. The selected action for KD West was data review and/or confirmatory soil sampling and geophysical screening. Details of these proposed actions are contained in Appendix F to the DD. These actions are ongoing and the findings memo for all Training Areas post-DD work will be

prepared in 2020. The need for Land Use Controls (LUCs) will be determined after completion of the investigations as described in the Decision Document.

The September 2015 Small Arms Ranges (SAR) DD (KD East is one of 40 locations contained within this DD) presents the selected remedy for the KD East Range. The selected action for KD East was confirmatory soil sampling and potential removal actions. Details of these proposed actions are contained in Appendix D to the DD. These actions have been completed and the findings memo for all SAR post-DD work is currently being drafted. LUCs have been established in the DD to protect groundwater monitoring wells and other environmental sampling equipment on and around the small arms ranges.

EPA established use restrictions at the KD Range in May 1997 with the issuance of AO2 (SDWA I-97-1030), but those restrictions were lifted in May 2017 when EPA issued a Final Response to a 31 August 2016 Massachusetts National Guard (MANG) Request to modify the AO2 Scope of Work ("SOW"). EPA modified Sections II.A.1.a and Section II.A.1.f of the SOW to not prohibit firing of lead ammunition or other "live" ammunition at small arms ranges at or near the Training Range and Impact Area to the extent those actions receive approval and oversight from the Environmental Management Commission (EMC) in accordance with the Environmental Performance Standards.

- The authorization was conditioned upon continued compliance with all conditions established by the EMC.
- The authorization was conditioned upon MANG requesting and then receiving funds necessary to ensure compliance with the approved Operations, Maintenance, and Monitoring Plan.
- The authorization does not extend to any other ammunition or training device.
- The proposed use of this ammunition or training device was authorized only to the extent it does not interfere with the completion of investigation and cleanup activities.
- This decision will be reviewed as appropriate, but no less often than every five years. The purpose of the review is to revisit the appropriateness of the decision in providing adequate protection of human health. The scope of the review will include, but is not limited to, the following questions: are the ranges operating as designed (i.e., monitoring or maintenance); have any of the cleanup standards changed since the decision; and is there any new information that would warrant modifying or withdrawing the decision? If appropriate, additional actions (including, if necessary, reopening the decision) may be required as a result of these reviews. EPA retained all its enforcement authorities pursuant to existing Administrative Orders.

Your letter also describes that the proposed project "...includes a process for selection of pollution prevention strategies and best management practices through the joint coordinated review efforts of the Environmental Management Commission, the United States Environmental Protection Agency and the Massachusetts Department of Environmental Protection." As such, the EMC should continue to be consulted during the range design and development process, including the selection of pollution prevention strategies and best management practices that will be codified in an Operations, Management, and Maintenance Plan (OMMP) for the Multi-Purpose Machine Gun Range. These strategies and practices should also be developed to adhere

to the conditions described above. It may also be a worthwhile exercise for the EA to consider how the adaptive management strategies employed during the Juliet, Kilo, Tango and Sierra Range pilot periods might apply to development and use of the KD Range.

Thank you for the opportunity to offer comments in advance of your work to prepare the EA. Please contact me at 617-918-1025 with any comments or questions. We look forward to reviewing the EA when it is available.

Sincerely,



Timothy Timmermann
Director, Office of Environmental Review

cc:

Kathryn Barnicle
AECOM
9 Jonathan Bourne Drive
Pocasset, MA 02559

Kathryn.barnicle@aecom.com



September 10, 2019

Keith J. Driscoll
NEPA/MEPA Manager
Massachusetts National Guard
2 Randolph Road
Hanscom AFB, MA 01731

Kathryn Barnicle
AECOM
9 Jonathan Bourne Drive
Pocasset, MA 02559

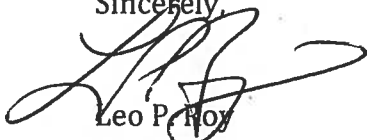
Dear Mr. Driscoll & Ms. Barnicle,

Thank you for the letter regarding Interagency and Intergovernmental Coordination for Environmental Planning for the proposed construction and operating of a Multi-Purpose Machine Gun Range at Camp Edwards.

The Department of Conservation and Recreation is represented on the Environmental Management Commission (EMC) and Leonard Pinaud is our point of contact. We will prepare comments through the EMC process. We have included Leonard Pinaud as a CC to this letter so that the EMC can be added to this process.

Thank you for your continued support of DCR and our programs which benefit so many Massachusetts citizens and other visitors.

Sincerely,



Leo P. Roy
Commissioner

CC: Leonard Pinaud, EMC
Commissioner Martin Suuberg, MassDEP
Commissioner Ronald Amidon, Dept. of Fish and Game

COMMONWEALTH OF MASSACHUSETTS · EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS

Department of Conservation and Recreation
251 Causeway Street, Suite 600
Boston MA 02114-2119
617-626-1250 617-626-1351 Fax
www.mass.gov/dcr



Charles D. Baker
Governor

Karyn E. Polito
Lt. Governor

Kathleen Theoharides, Secretary, Executive
Office of Energy & Environmental Affairs

Leo Roy, Commissioner
Department of Conservation & Recreation



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
ENVIRONMENTAL MANAGEMENT COMMISSION
Building 3468, Beaman Street, Camp Edwards, MA 02542-5003

CHARLES D. BAKER
Governor

KARYN E. POLITO
Lieutenant Governor

KATHLEEN A. THEOHARIDES
Secretary

RONALD AMIDON

MARTIN SUUBERG

LEO ROY
Commissioners

September 13, 2019

Mr. Keith Driscoll
NEPA/MEPA Manager
Joint Force Headquarters
Massachusetts National Guard
2 Randolph Road
Hanscom AFB, MA 01731-3001

AECOM
Attn: Ms. Kathryn Barnicle
9 Jonathan Bourne Drive
Pocasset, MA, 02559

Project Name: Multi-Purpose Machine Gun (MPMG) Range
Proponent: Massachusetts National Guard
Location: Camp Edwards, Massachusetts
Document: Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) for the Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA)

Dear Mr. Driscoll/Ms. Barnicle;

The Environmental Management Commission (EMC) was created within the Executive Office of Environmental Affairs by Chapter 47 of the Acts of 2002. 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 are co-located with and are within the Reserve. The EMC has the following comments on the above referenced IICEP for the EA in accordance with NEPA:

Overview:

As described in the IICEP, the Massachusetts National Guard is preparing environmental documentation for proposed construction and operation of a Multi-Purpose Machine Gun (MPMG) Range at Camp Edwards,

(508) 968-5127 Telephone (508) 968-5128 Facsimile

Website: www.thenationsfirst.org/ERC/emc

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ENVIRONMENTAL MANAGEMENT COMMISSION

Massachusetts. Construction of a MPMG Range will provide National Guard personnel with a modernized small arms training venue to efficiently accomplish mandatory soldier tasks and mission training to include meeting weapons qualification requirements in a manner that protects human health and the environment.

The proposed MPMG Range would be built over and improve on the existing Known Distance (KD) Range, and is proposed to be developed with range-specific structures to include soil berms and potentially other types of engineered solutions for projectile capture. The KD Range parcel is owned by the Commonwealth and is currently leased to the Department of the Army, with licenses to the Massachusetts National Guard.

The Massachusetts National Guard is currently identifying environmental resources, issues and constraints associated with the proposed project area to effectively assess potential environmental impacts associated with the proposed action. The Massachusetts National Guard is requesting baseline information regarding potential environmental issues at, or in the vicinity of, the proposed project area.

The EMC has been working closely with the Massachusetts National Guard and their consultants to provide guidance and compliance assistance with regard to environmental issues unique to the proposed Project. A site visit to the Project site by the EMC Environmental Officer was made on August 8, 2019 with the Massachusetts National Guard and their consultants, as well as with a representative from the Massachusetts Environmental Policy Act within the Executive Office of Energy and Environmental Affairs and with representatives of the MassWildlife Natural Heritage and Endangered Species Program. In addition, the Massachusetts National Guard has presented information regarding the proposed MPMG Range location and design to the EMC and its advisory councils, the Science Advisory Council (SAC) and the Community Advisory Council (CAC). The CAC assists the EMC by providing advice on issues related to the protection of the water supply and wildlife habitat on the reserve; and the SAC assists the EMC by providing scientific and technical advice relating to the protection of the drinking water supply and wildlife habitat on the Reserve. Finally, the EMC has participated in meetings with the Massachusetts National Guard and MassWildlife to establish a mitigation bank and overall strategy to facilitate implementation of long-term planning efforts including modernization of the Camp Edwards range complex and infrastructure.

General Comment:

EMC Environmental Performance Standards (EPS): The construction, operation and maintenance of the proposed MPMG Range must comply with the current revision of the Environmental Performance Standards, dated April 6, 2017. The final design and the operation, maintenance and monitoring plan for the MPMG Range will require approval by the EMC prior to construction and operation.

Specific Comments:

Solid and Hazardous Waste: The Massachusetts National Guard is advised that there may be soils contaminated with oil and hazardous materials (OHM) and munitions items located at the proposed project location. A plan for the management of OHM and munitions items which may be found during construction should be developed by the Massachusetts National Guard. (EPS 14.0-16.0)

Construction Management Plan: A construction management plan should be provided which defines the limits of the proposed work area, how construction vehicles and personnel will be controlled to remain within work areas, construction and laydown areas, erosion control, dust suppression, vehicle parking and refueling areas and noise during construction. (EPS 4.5, 4.6, 5.0, 8.0, 9.0, 12.0)

ENVIRONMENTAL MANAGEMENT COMMISSION

Refueling During Construction: EPS 15.3.3 states that no storage or movement of fuels supporting field activities, other than in vehicle fuel tanks is permitted except in approved containers no greater than five gallons in capacity. The Massachusetts National Guard is advised that a waiver of EPS 15.3.3 may be granted by the EMC for the duration of the construction period subject to EMC review and approval of a site specific Spill Prevention, Control and Countermeasure Plan. All construction-related refueling and equipment maintenance activities must be conducted in accordance with an EMC-approved refueling plan.

Access Control/Coordination/Communication: The Massachusetts National Guard is advised to develop an access control and communications plan during construction activities with Camp Edwards Range Control personnel. This plan will be particularly important during the National Guard Annual Training cycle and for the recreational hunting program at Camp Edwards.

Ammunition: The EMC recommends that the MPMG Range be designated as a copper ammunition-only range. (EPS 19.0)

Alternative 2: Southerly Location Alternative: The IICEP states that this alternative would result in greater noise impacts to the community. The Massachusetts National Guard has performed an on-site noise study and noise modeling for the MPMG. The studies concluded that there would be noise impacts to the community during range use (the nearest off post community is approximately 500 meters to the southeast and 1000 meters to the east). The EMC has recommended additional noise studies to be performed during training activities at the MPMG to determine if nuisance conditions exist and if noise mitigation is necessary. (EPS 9.0)

MPMG Range Operation and Maintenance: The EMC recommends that appropriate funding be appropriated to ensure that the MPMG Range will be adequately staffed to ensure operation and maintenance activities are compliant with the required Operation, Maintenance and Monitoring Plan. (EPS 19.0)

Finally, the Massachusetts National Guard should continue to work closely during the permitting and the execution of the Project with the Massachusetts Department of Environmental Protection, the Environmental Management Commission, and the Massachusetts Division of Fisheries and Wildlife, who maintains custody, care and control of the Upper Cape Water Supply Reserve. Early coordination with Commonwealth and municipal resource agencies is recommended with regard to rare species and wetland resources which may be impacted by the proposed project.

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 508-968-5127 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 Roy, Department of Conservation and Recreation
Environmental management Commission Science Advisory Council

ENVIRONMENTAL MANAGEMENT COMMISSION

Environmental management Commission Community Advisory Council

Mr. Jason Zimmer, Massachusetts Division of Fisheries & Wildlife, Southeast Wildlife District

Mr. David Paulson, Massachusetts Division of Fisheries & Wildlife, Natural Heritage and Endangered Species Program

BG Christopher Faux, JBCC Executive Director

LTC Matthew Porter, Commander, Camp Edwards

Mr. Paulo A. Baganha, Massachusetts National Guard Environmental Program

Dr. Michael Ciaranca, Massachusetts National Guard Environmental & Readiness Center, Camp Edwards



DEPARTMENTS OF THE ARMY AND THE AIR FORCE
JOINT FORCE HEADQUARTERS
MASSACHUSETTS NATIONAL GUARD
OFFICE OF THE ADJUTANT GENERAL
2 RANDOLPH ROAD
HANSCOM AFB, MA 01731-3001

11 February 2020

MAAR-CFMO-ENV

MEMORANDUM FOR RECORD

SUBJECT: State Historic Presentation Office (SHPO) Consultation for the development of the Environmental Assessment (EA) of the Multi-Purpose Machine Gun Range, Camp Edwards, Massachusetts

1. The Massachusetts Army National Guard (MAARNG) is consulting and coordinating with the State Historic Presentation Office (SHPO) which is the Massachusetts Historical Commission (MHC) in accordance with Section 106 of the National Historic Preservation Act (NHPA) and AR 200-1 (Environmental Protection and Enhancement). The Proposed Action is considered an undertaking as defined by 36 CFR Part 800.3
2. Federal agencies are to consider the effect an undertaking may have on historic properties; its implementing regulations, 36 CFR Part 800, describe the procedures for identifying and evaluating historic properties; assessing the effects of Federal actions on historic properties; and consulting to avoid, reduce, or minimize adverse effects.
3. Two letters have been submitted to the MHC requesting comment on the project:
 - a. 7 August 2019 Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) letter
 - b. 5 November 2019 Project Notification Form (PNF)
4. On 9 January 2020, Edward L. Bell, Senior Archaeologist for the MHC was contacted by phone to discuss if the MHC would be responding to the two letters noted above. Mr. Bell indicated that they would not be responding and identified that this action falls under **36 CFR 800.3(c)(4) Failure of the SHPO/THPO to respond**. If the SHPO/THPO fails to respond within 30 days of receipt of a request for review of a finding or determination, the agency official may either proceed to the next step in the process based on the finding or determination or consult with the Council in lieu of the SHPO/THPO.

Keith J. Driscoll
NEPA/MEPA Manager
Massachusetts Army National Guard



DEPARTMENTS OF THE ARMY AND THE AIR FORCE
JOINT FORCE HEADQUARTERS
MASSACHUSETTS NATIONAL GUARD
OFFICE OF THE ADJUTANT GENERAL
2 RANDOLPH ROAD
HANSCOM AFB, MA 01731-3001

11 February 2020

MAAR-CFMO-ENV

MEMORANDUM FOR RECORD

SUBJECT: Native American Consultation (NAC) for the Environmental Assessment (EA) for the Multi-Purpose Machine Gun Range, Camp Edwards, Massachusetts

1. In accordance with the Department of Defense Instruction (DoDI), 4710.02, the Massachusetts Army National Guard (MAARNG) has prepared this Memorandum for Record (MFR) regarding NAC with federally-recognized tribes' Tribal Historic Preservation Office (THPO).
2. The three tribes invited to participate included:
 - Mashpee Wampanoag Tribe
 - Wampanoag Tribe of Gay Head (Aquinnah)
 - Stockbridge-Munsee Community, Band of Mohican Indians of Wisconsin
3. NAC letters were mailed to the three tribes on 7 August 2019 requesting comments on the preparation of the EA
4. Copies of the Notice of Project Change (NPC) submitted under the Massachusetts Environmental Policy Act (MEPA) to the Massachusetts Executive office of Energy and Environmental Affairs (EOEEA) were mailed to the three tribes on 3 February 2020.
5. A follow up call was made to the THPO's on 7 February 2020.
6. As of 11 February 2020, there has been no formal or informal responses from the THPOs.
7. In accordance with the 2011 NEPA Handbook Volume II, Section 8.8.6, the tribes will be notified again when the Final EA/draft Findings of No Significant Impacts (FNSI) public review period begins.

This concludes the MAARNG CFMO-ENV's review of the Proposed Action, as it relates to responsibilities stated in the DoDI 4710.02. If any significant changes to the Proposed Action occur, the MAARNG CFMO-ENV will review the changes, in order to determine if additional consultation is warranted.

A handwritten signature in black ink, appearing to read "K. Driscoll".

Keith J. Driscoll
NEPA/MEPA Manager
Massachusetts Army National Guard

Agency Coordination

The following is a tabulation of the agency coordination that has occurred within the past few years regarding the MPMG Range. This is not an exhaustive list and there are likely additional meetings and correspondence not captured here. This list highlights the extensive efforts and thorough pre-planning the MAARNG has had with local, State, and Federal agencies and with community groups. This pre-planning has been in addition to the long-term planning that has occurred for the MPMG Range dating back to the 1980s within the MEPA process. Communication and coordination between MAARNG and these State agencies continues regarding the MPMG Range Project. The MAARNG has established mutually respectful relationships with these agencies and the four towns in which Camp Edwards resides (Bourne, Falmouth, Mashpee, Sandwich). The MAARNG meets regularly with the EMC, the SAC, and the CAC including pre-application meetings, development of presentations, public meeting facilitation, outreach, and informal and formal consultations as described below. This list provides a comprehensive summary of the type of reporting, discussions, or actions that involved the MPMG Range.

Annual State of the Reservation Reports

In accordance with the provisions of the final MEPA certificate issued on 16 July 2001, the Camp Edwards Environmental & Readiness Center (E&RC) publishes an Annual State of the Reservation Report for each training year. As required by Chapter 47, Acts of 2002, copies of the report have been provided to the EMC, SAC, and CAC. Copies are made available at the town libraries in Bourne, Sandwich, Mashpee, and Falmouth. A notice of availability is published in the Environmental Monitor annually.

Community Advisory Council (CAC)

The 15-member CAC consists of one representative from each of the surrounding towns (Bourne, Falmouth, Mashpee, and Sandwich), one resident of base housing, two representatives from the military, one representative from the Cape Cod Commission, one representative from the Upper Cape Regional Water Supply Cooperative, one representative from the Wampanoag Tribe, and five other members appointed by the Governor.

- Minutes of Meeting 2 May 2018
- Minutes of Meeting 4 October 2018

Science Advisory Council (SAC)

The SAC assists the EMC by providing scientific and technical assistance to the EMC as it relates to protection of natural resources of the Reserve. The SAC, appointed by the Governor, consists of scientists and engineers recognized for their expertise in the areas of public health, water protection, wildlife habitat management, and land use management.

- Minutes of Meeting 2012 September
- Minutes of Meeting 18 May 2017
- Minutes of Meeting 10 May 2018

- Minutes of Meeting 20 September 2018

Environmental Management Commission (EMC)

The EMC was created within the EOEEA by EO 443 and Chapter 47 of the Acts of 2002. 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, created as public conservation land, by oversight, monitoring and evaluation of all military and other activities on the Reserve. EMC has reviewed the MPMG Range plans at the 20%, 30%, and 65% design stages.

- Minutes of Meeting 8 June 2016
- Minutes of Meeting 25 October 2018
- Minutes of Meeting 23 May 2019

NHESP

The NHESP implements MESA and has been working closely with the MAARNG to develop a comprehensive rare species mitigation plan for the MPMG Range for the net benefit of the species at Camp Edwards.

- Conference Call 26 February 2019
- Updated Species List 16 August 2019
- Conference Call 17 December 2019
- Upcoming Meeting 5 February 2020

Massachusetts Historical Commission (MHC)

A Project Notification Form (PNF) was submitted to MHC for comment on 23 October 2019. No comments were received and a Memorandum For Record (MFR) documenting this correspondence has been developed.

State Agency Site Visit

Recently, on 8 August 2019, the MAARNG hosted a site visit for State agencies to view the proposed MPMG Range site and rare species mitigation areas within Camp Edwards. In attendance were representatives from the EMC, MEPA, and NHESP.

- MEPA, EMC, NHESP 8 August 2019

Neighborhood Mailings

Camp Edwards conducted a test fire at KD Range in August 2015, to simulate noise from the proposed MPMG range in the Southern Location Alternative. A mailing was sent to neighbors identifying the time and date that the noise test was to take place and requested comments regarding the test any noises heard.

- Noise Test mailing to 700 neighbors (14 responses) 2015

Interagency and Intergovernmental Coordination for Environmental Planning (IICEP)

IICEP is required as part of the Federal NEPA process in order to request information from local, State, and Federal Agencies, and other interested parties for input in the preparation of the EA. Letters were sent on 7 August 2019 to the following agencies. Only three comment letters were received from the EMC, USEPA, and the MassDCR. The comment letters received were used to assist in the preparation of this NPC.

- Cape Cod Commission
- Cape Cod Conservation District
- EMC
- EOEEA
- MassDCR
- MassDEP
- MHC
- NHESP
- Town of Bourne
- Town of Falmouth
- Town of Mashpee
- Town of Sandwich
- University of Massachusetts Amherst
- U.S. Army Corps of Engineers
- U.S. Department of Agriculture
- USEPA
- USFWS

Native American Consultation (NAC)

A separate but similar process to the IICEP occurred under the Native American Consultation (NAC). Letters were sent on 7 August 2019. No comment letters have been received.

- Mashpee Wampanoag Tribe
- Wampanoag Tribe of Gay Head (Aquinnah)
- Stockbridge-Munsee Community, Band of Mohican Indians of Wisconsin

Special Military Reservation Commission (SMRC)

The MMR (now JBCC) was established by the Massachusetts legislature in Chapter 196 of the Acts of 1935, which created the Special Military Reservation Commission and authorized it to acquire certain lands in the towns of Sandwich, Bourne, Falmouth and Mashpee for military purposes.

- Meeting 10 April 2019
 - The SMRC voted on this date to transfer SMRC Tracts 1-4 (128 acres) to the Massachusetts Department of Fish and Wildlife. The transfer of these parcels along with the previously transferred Parcel 5 (135 acres) is an integral part of the mitigation strategy for the MPMG.

Impact Area Groundwater Study Program (IAGWSP)

The MAARNG is coordinating with the IAGWSP regarding any UXO removal and to ensure the proposed MPMG Range construction and activities do not interfere with ongoing site investigations, restorations, and monitoring activities.