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March 24, 2006

CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS ON THE NOTICE OF PROJECT CHANGE

PROJECT NAME	: Massachusetts National Guard Properties at Massachusetts Military Reservation
PROJECT MUNICIPALITY	: Bourne, Falmouth, Mashpee, Sandwich
PROJECT WATERSHED	: Cape Cod
EOEA NUMBER	: 5834
PROJECT PROPONENT	: The Massachusetts National Guard
DATE NOTICED IN MONITOR	: February 22, 2006

Pursuant to the Massachusetts Environmental Policy Act (G.L. c. 30, ss. 61-62H) and Section 11.10 of the MEPA regulations (301 CMR 11.00), I have reviewed the Notice of Project Change (NPC) submitted on this project and hereby determine that it **does not require** the preparation of a supplemental Environmental Impact Report (EIR).

The proposed project involves upgrades to three firing ranges located within the Camp Edwards Training Area at the Massachusetts Military Reservation (MMR). Proposed activities at two of the ranges (Sierra range and Echo range) involve replacement of target control and support systems to meet U.S. Army range standards. Proposed activities at the Bravo range involve installation of a STAPP bullet catcher system, which will be pilot-tested as part of the National Guard's groundwater management plan. Project activities include vegetation clearing, site grading and drainage work associated with range improvements.

The proponent has submitted a NPC in accordance with the requirements of the Certificate on the Final Area-Wide EIR for the MMR Master Plan, which was issued on July 16, 2001. As part of the MMR Master Plan, the Camp Edwards Training Area (referred to as the northern 15,000 acres in the Final EIR) was set aside for permanent protection of water supplies, wildlife habitat, and open space, while allowing compatible military training. The Certificate on the Final EIR required MEPA review of future projects within the Camp Edwards Training Area that exceed certain thresholds. These thresholds include: the stand-alone review thresholds set forth in Section 11.03 of the MEPA regulations; any new or

expanded buildings or structures, roadway paving or improvements, or wastewater infrastructure; and “lowered thresholds” for activities involving any new impervious area, vegetative clearing or other land alteration.

The project as proposed, while consistent with the uses envisioned in the Final EIR Master Plan, exceeds the “lowered thresholds” for impervious area (more than 0.5 acres), vegetative clearing (more than 2 acres) and new building or structure of more than 500 square feet (sf). Environmental impacts associated with the proposed project include 6.5 acres of vegetation clearing, one acre of impervious area, and approximately 2,000 sf of new structures. Project activities are proposed within priority habitat of rare species and in the vicinity of a vernal pool, and include lighting system installation with potential impacts on rare moths.

The Division of Fisheries and Wildlife, Natural Heritage and Endangered Species Program (NHESP) has determined that upgrades proposed for the Sierra range will not adversely affect habitat for rare species provided certain conditions are adhered to as further detailed below and in the comment letter from the NHESP. As mitigation for the clearing of 6.5 acres of pitch pine/scrub oak vegetation, the proponent has committed to allow a 55-acre area on-site to re-vegetate (including an area between the 300 meter and 800 meter distance at the Sierra range). The lighting system proposed is for safety purposes and NHESP has determined that occasional use will not significantly disrupt breeding, migration, or other natural movement patterns of state-listed moths.

As further detailed in the comment letter from the Department of Environmental Protection (DEP) and the Environmental Management Commission (EMC), project activities could potentially interfere with on-going soil sampling, groundwater monitoring and related remediation activities. Close coordination with the appropriate agencies, as further detailed below and in the comment letters received, will be necessary to ensure project activities do not conflict with environmental assessment and remediation.

Based on review of the NPC and comments received, and after consultation with relevant state agencies, I am satisfied that potential impacts associated with the proposed range improvements can be adequately avoided and minimized or mitigated providing the conditions of this Certificate are met. My determination that no further review is required for the proposed project is conditioned as follows.

Rare Species

- The proponent should ensure that there is no net loss of pitch pine (*Pinus rigida*)/scrub oak (*Quercus illicifolia*) habitat across the site as a whole. The proponent should allow the rear part of the range complex (approximately 55 acres) to return to a native system that would include a mix of pine barrens community types.
- All soils used for grading should come from sources within the MMR.
- Any re-seeding necessary to prevent erosion should only use native seed mix or re-vegetate naturally as further detailed in the NHESP comment letter.

- The ranges should be monitored regularly for invasive plant species, and these species should be removed if found.
- The lighting system proposed for safety purposes may be used occasionally but should not be left on continuously nor controlled by a timer or other mechanism which would light the firing range automatically at regular intervals or in a continuous manner.

Contaminated Soils Management

- As further detailed in the DEP comment letter, additional sampling is proposed at the Sierra range pursuant to the Massachusetts Contingency Plan (MCP) due to concentrations of the propellant 2,4-DNT in soils. The sampling proposed by the Impact Area Groundwater Study Program should be performed before any project activities involving disturbance of the range area. If the area proposed for sampling has already been disturbed, the proponent should submit a Scope of Work for sampling the disturbed area to DEP, prior to any further work on the project site, to determine the nature and extent of any remaining semi-volatile organic compounds (SVOCs) in soils.
- The proponent should develop and implement a Soil Management Plan (SMP) for ranges where activities are proposed as recommended by the EMC. The SMP should be designed to avoid and minimize the mixing of soils that are relatively free of metals associated with projectiles from soils that have high metal/heavy metal content.
- The proponent should coordinate with the EMC and relevant clean-up programs, including the US Army Environmental Center (USAEC) and DEP's Bureau of Waste Site Clean-up (BWSC), to ensure that any reworking of soils does not interfere with assessment of contamination.

Groundwater Protection

- The proponent should coordinate closely with the USAEC to ensure that the installation of the proposed bullet catcher system at the Bravo range will not interfere with the USAEC tungsten study. As further detailed in the comment letter from DEP, the Bravo range is one of three ranges at which the USAEC is conducting a sampling and analysis program for soil and groundwater to determine the fate and transport of metallic tungsten from small caliber ammunition at Camp Edwards. The study is due for completion in the Fall of 2006.
- The proponent should consult with the EMC and USAEC regarding the results of the tungsten study. As noted by EMC in its comment letter, the proponent should allow for flexibility in the location or relocation of the proposed bullet catcher system to accommodate any additional research or other activities associated with tungsten in groundwater.

Pollution Prevention/Range Management Plan

- The proponent should complete the pollution prevention/range management plan by December 2006 and include the completed plan in the next annual State of the Reservation Report, which is due to be issued in January 2007

Annual Reporting

- The annual State of the Reservation reports should be submitted to the MEPA Office as required by the Certificate on the Final EIR for the MMR Master Plan.
- The next annual report, due in January 2007, should include the results of the USAEC tungsten study, the pollution prevention and soils management plans, and other information as required by the Certificate on the Final EIR.

Communication and Coordination

- Prior to filing the NPC, the proponent initiated project activities resulting in clearing of 6.5 acres of pitch pine/scrub oak vegetation, which exceeded the lowered thresholds established for MEPA review. I will expect the proponent to establish an effective communication and coordination mechanism to ensure appropriate consultations and MEPA filings in advance of any future projects. The next annual report should provide an update on management plans and agreements, and coordination mechanisms established, to demonstrate consistency with the requirements of the Final EIR Certificate.

I will expect the proponent to coordinate closely with the USAEC, DEP and EMC prior to and during project implementation to avoid any conflicts with environmental assessment and remediation activities. The proponent should also continue consultations with NHESP to finalize rare species mitigation plans. The NPC has adequately described the proposed project and identified potential impacts and mitigation measures. I am satisfied that any outstanding issues can be adequately addressed by adherence to the conditions of this Certificate and the requirements of other state and local agencies. The project as proposed in the NPC requires no further review under MEPA.

March 24, 2006

DATE



Stephen R. Pritchard, Secretary

Cc: Mark J. Begley, Environmental Officer, Environmental Management Commission

Comments received:

3/14/06 Executive Office of Environmental Affairs, Environmental Management Commission
 3/14/06 Department of Environmental Protection, Southeast Regional Office
 3/16/06 Division of Fisheries and Wildlife, Natural Heritage and Endangered Species Program

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