

**Community Advisory Council to the
Environmental Management Commission
Building 1805
Camp Edwards, Massachusetts
October 13, 2022
6:00 p.m.
Meeting Minutes**

CAC Members:

Mark Harding
John Phelan
Brig. Gen. Virginia Gaglio
Raymond Jack
Mimi McConnell
Heather McElroy

Bob Prohett
Andrew Campbell

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George Slade
Eve Zuckoff

MA ARNG
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240-606-7360
508-372-1394
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Handouts Distributed at Meeting:

1. Draft Meeting Minutes, Community Advisory Council, May 15, 2019
2. Draft Meeting Minutes, Joint Community Advisory Council and Science Advisory Council, July 29, 2020
3. Draft Meeting Minutes, Joint Community Advisory Council and Science Advisory Council, October 8, 2020
4. Draft Meeting Minutes, Community Advisory Council, June 30, 2022
5. Environmental Officer Update, October 2022
6. Camp Edwards Update, 2022
7. Operations, Maintenance and Monitoring Plan, 13 October 2022
8. Climate Resilience at Camp Edwards

Agenda Item #1. Welcome – Ms. Mimi McConnell, CAC Chair

Ms. McConnell welcomed everyone to the Community Advisory Council (CAC) meeting. She announced that Environmental Management Commission Environmental Officer, Len Pinaud, is attending the meeting virtually. She asked for a moment of silence to honor Virginia Valiela, a CAC member who passed away. Four new members have been appointed to the CAC: Jack Phelan, Raymond Jack, Shawn Cody, and CAPT Sean Hannigan.

Agenda Item #2: Review of CAC Minutes and Approval – Ms. Mimi McConnell, CAC Chair

- May 15, 2019, meeting minutes: Ms. McElroy, Mr. Phelan and Mr. Jack abstained; all other members were in favor of accepting the meeting minutes as written.
- July 20, 2020, meeting minutes: Ms. McElroy, Mr. Jack, and Mr. Phelan abstained; all other members were in favor of accepting the meeting minutes as written.
- October 8, 2020, meeting minutes: Mr. Harding, Ms. McElroy, Mr. Jack, and Mr. Phelan abstained; all other members were in favor of accepting the meeting minutes as written.
- Mr. Jack made a motion to accept the June 30, 2022, meeting minutes; Brig Gen Gaglio seconded the motion. Mr. Campbell abstained; all other members were in favor of accepting the meeting minutes as written.

Agenda Item #3: Environmental Officer Update – Mr. Leonard Pinaud, EMC Environmental Officer

Mr. Pinaud, Environmental Management Commission (EMC) Environmental Officer (EO), summarized the activities related to the Upper Cape Water Supply Reserve (the Reserve).

- The Tango Range Design and Operations Maintenance and Monitoring Plan were approved in September 2022. The approval letter was distributed to CAC members.
- Mr. Pinaud is working with Natural Resources and Training Lands Manager, Mr. McCumber, and others on a Prescribed Fire Standard Operation Procedures (SOP) for ignition and suppression of prescribed burns at Camp Edwards.
- An Unexploded Ordnance Response SOP for Camp Edwards has been developed. The SOP formalizes current procedures and is pending signature.
- The EMC is working with the IAGWSP for the PFAS issue in Camp Edwards northern training area. The Massachusetts Department of Environmental Protection and the US Environmental Protection Agency are following this issue and the Environmental Management Commission is involved.

- The EMC will meet on October 27 at 1:30 p.m. Six appointments were made to the CAC; there is currently one vacancy. He is working with the Division of Fish and Game's Chief of Staff to get that filled. There are currently two Science Advisory Council (SAC) vacancies.
- The Environmental Management Commission has its own page on the Executive Office of Energy and Environmental Affairs website. The public can find information on the EMC and the meeting minutes are posted there. Mr. Pinaud asked the CAC to visit the page and provide feedback if they think something needs to be changed or added.
- The Environmental Protection Agency Sole Source Aquifer review status and information is available on the US Environmental Protection Agency website:
<https://www3.epa.gov/region1/eco/drinkwater/capecod.html>.

CAC members discussed the information and asked questions.

What are the open positions on the CAC and SAC?

There is a vacancy for an At-Large member on the CAC. At-Large members represent the public at large. There are several open positions on the SAC. The SAC members are subject matter experts, and Mr. Pinaud needs to review which subject matter experts are now on the SAC and which subject matter experts Chapter 47 of the Acts of 2002 states are needed on the SAC and fill those accordingly.

Agenda Item #4: Camp Edwards Update – *Mr. Matthew Porter, Base Operations Manager, MAARNG, Mr. Alex McDonough, Deputy Base Operations Manager, MAARNG*

Mr. McDonough provided a Camp Edwards update to the CAC.

- Staff updates: Mr. McDonough is now the Deputy Base Operations Manager. The position is a Title 5 federal technician, which is a civilian position.
- Training updates: The second year of Operation Viking was planned by the 412 Civil Affairs Battalion; 450-500 soldiers were trained and utilized the US Coast Guard Airfield for static line jumps and the Northern Training Area, where they qualified on their weapons and completed civil affairs tasks. Five hundred soldiers were trained during Patriot Crucible; engineers and the firefighting detachment were the main participants preparing for multi-domain operations. Engineers participated in military decision-making exercises and live fire base defense. In five weeks, 1,000 soldiers were trained for collective training tasks.
- Annual training: the MAARNG's Aviation Battalion is preparing to deploy; Camp Edwards support their annual training along with a chemical company which is deploying. There were six additional units from company to battalion to brigade size units were trained during the summer.
- Range update: the small arms range monitoring sampling contract was awarded. The Tango Range OMMP has been approved and the MAARNG is working on developing a backstop upgrade for Lima Range. Originally, netting was utilized on Lima Range to keep the 203 rounds within the range footprint. The netting gets knocked down in high winds; a solution is installing concrete backstops to stop the training rounds from going beyond the range footprint.

Agenda Item #5: Operations, Maintenance and Monitoring Plan Update– *Mr. Alex McDonough, Deputy Base Operations Manager, MAARNG, Mr. Michael Ciaranca, Deputy Director, MANG E&RC*

Mr. Ciaranca gave a presentation on the Operations, Maintenance and Monitoring Plan (OMMP) Update:

- The OMMPs are required by Environmental Performance Standard (EPS) 19. The OMMP requires that the Massachusetts Army National Guard (MAARNG) capture, contain, manage, monitor, and report. An OMMP identifies operations and management of the ranges and Best Management Practices (BMPs) for Small Arms Ranges (SARs) at Camp Edwards and it is established so the MAARNG can meet current and future training requirements.

- The MAARNG employs maximum feasible use of Pollution Prevention (P2) and BMPs to avoid any contamination with groundwater in the Upper Cape Water Supply Reserve, which is also designated as a MassDEP Water Supply Zone 2.
- An OMMP is a living document; user changes, regulatory changes and BMP changes may take place at the request of the users, regulatory bodies, and the MAARNG command structure.
- The MAARNG is updating its OMMPs and will be asking for input on several topics including environmental monitoring, capture and containment, well, lysimeters, soil sampling, and filtered versus unfiltered sampling.
- The OMMPs will be updated for consistency, to be up to date regarding pollution prevention, and implementable for Camp Edwards' users.
- At the SAC's last meeting, the MAARNG asked the SAC if unfiltered porewater and groundwater samples be collected and analyzed to determine the contribution of colloids to any transport of potential contaminants of concern? Unfiltered samples will be collected.

CAC members and attendees asked questions.

With the vacancies on the SAC, does the MAARNG feel the expertise is there; is there expertise we wish we had?

- There are SAC members with expertise in water, and subject matter experts may be sought out to be added to the SAC Ad Hoc committee.

Is sampling for heavy metals and if the samples are double blinded?

- Samples are 100-point, multi-increment samples with two replicates. Samples are taken for antimony, copper, lead, and substances that may mobilize antimony in soil. The samples are collected, combined, and analyzed and are validated.
- A contractor takes the samples, they are provided to a laboratory which does the analysis and validation. The results are provided to the MAARNG. The results are provided to the EMC, SAC, and CAC and the EPA.

Agenda Item #6: Climate Resilience at Camp Edwards – Mr. Jake McCumber, Natural Resources and Training Lands Manager

Mr. McCumber gave a presentation on climate resilience at Camp Edwards.

Mr. McCumber gave a presentation on climate resilience at Camp Edwards. Climate resilience is planning, preparedness, and science-driven policy and action. It requires detailed understanding of ongoing changes and predictions, root causes, scales of impact and affected resources, and complexity of situation and concurrent challenges, such as biodiversity. Resilience is the ability of this system to persist and recover from the threats already ongoing and those that are forecast. Resilience is an important context for focus for future discussions. He discussed major natural threats; the concurrent crises of climate change vulnerabilities and the biodiversity crisis; planning solutions and key objectives including maximizing diversity, providing healthy natural communities that are a regional or local conservation priority, increasing or stable populations of site or regional priority species, decreasing fire hazard, and maximizing carbon storage while meeting other key objectives through best management practices, land-level planning and long-term ecosystem health.

CAC members and the audience discussed the information and asked questions.

Mr. Jack said he strongly recommends that government factor climate change into their project plans.

Dr. Burns asked which NGOs the MAARNG is working with/associated with.

- The MAARNG collaborates with the Southeastern Massachusetts Pine Barrens Alliance and is working with Woodwell Climate Research Center on the climate resilience plan, as well as Mass Audubon and others.

Agenda Item #7: Public Comment – Ms. Mimi McConnell, CAC Chair

Ms. Carey, of 350 Cape Cod and representing the Cape-wide Coalition Against the MPMG, read a letter on behalf of the coalition, regarding the proposed Multi-Purpose Machine Gun Range. Ms. Carey said, “the coalition signed this letter: Thank you for the opportunity to send these comments. I am speaking on behalf of the Cape-wide coalition of faith, civic, climate and justice groups representing thousands of constituents in the Cape Cod region. Our coalition adamantly opposes this plan because it violates state statutes to permanently conserve the area for water and natural habitat protection. I go on to repeat the three purposes of the EMC, which I don’t need to define to you. Basically, we feel the plan as proposed is inconsistent with the three purposes of the EMC for myriad reasons that have been submitted in public comments by over 300 Cape Codders, in letters to the editor, in social media, and the reasons I’ll quickly summarize: its potentially deleterious impacts to the Upper Cape water supply, lack of public engagement in the approval process, failure to account for the loss of carbon sequestration resulting from the massive clearing of mature trees and the resulting climate impacts, loss of habitat for flora and fauna including endangered species, increased health burdens on the base’s Upper Cape neighbors from firing range noise. Lastly, we feel the range is unnecessary. Currently available options, especially the new firing range at Fort Devens, which does not sit atop a sole source aquifer, have not been adequately considered. The EMC has the power to stop this project from moving forward and we urge you to do so at the earliest opportunity.

Mr. Slade, who is the liaison from the Town of Bourne on the Military-Civilian Community Council, stated that: “We just had a presentation from the military at the selectmen’s meeting. I’m back here just to speak to the range, and I want to make a comment that the presentations were impressive. If this involved a few decades ago we would have had CH2m Hill and all the contractors that have been making their life careers working here remediating problems. That said, I’m still concerned a little bit about the MPMG expansion. I believe it’s an \$11 million investment; I don’t know if that figure has changed. I think to make that cost effective, I think it was said we are going to be attracting units as far away as New York state and pretty much the northeast. We would become the destination for machine gun training, I believe, to make this \$11 million investment pay off. And that said, the testing that’s being done, they sound like legitimate tests that are being performed. You’re talking about worst case scenarios, but that could be a whole new dimension of worse case scenarios if were to be attracting huge numbers of units from all over the northeast and this would be the destination. It’s a concern I have. I think there is more work to be done. I just want to make that point. Thank you very much.”

Ms. Vergara, from Senator Moran’s office, stated: “My name is Arielle Vergara. I am here on behalf of Senator Susan Moran; she voiced concern regarding the proposed machine gun range at Camp Edwards. Before proceeding with any action that would undermine decades of local conservation efforts to protect a key water source for the region, (inaudible) over 170 acres of trees, I urge the commission to carefully review the findings of the sole aquifer environmental study currently underway by the EPA. The potential impacts to the Upper Cape Water Supply Reserve have been well documented by applicants. The unique geography of Cape Cod limits the residents’ access to clean water, which is in a single aquifer source that would now be at risk from contamination if the area was clear cut for live fire exercises, which are currently prohibited under Massachusetts Environmental Policy Act’s Environmental Performance Standards. Cape Cod is uniquely positioned as a hub of maritime and undersea innovation and ecological diversity that includes a variety of beaches, shore-side parks, ports and harbors, salt marshes, estuaries, kettle rivers, and other shoreline spaces. As our water resources have become threatened by the climate crisis, the communities of the Cape and Islands recognize the balancing act that is required in preserving these waterways as well as the livelihoods and ecosystems they support. The impact a project of this magnitude may have on this delicate balance should be approached with extreme caution. Joint Base Cape Cod is an important partner and economic driver for the region that we have the pleasure of collaborating with on many occasions. With that said, any project, particularly of this size, needs to prioritize the wellbeing of the community and the environment. We respectfully request any proposal for this project does the same. Thank you.”

Ms. Carey: “I’m reading in letter from the Faith Communities Environmental Network, which is 38 congregations on Cape Cod. Dear Mr. Pinaud and the EMC and the Citizens Advisory Council. So much has become clear since the 2020 discussion by the CAC and SAC regarding the proposed machine gun that is on protected land under your jurisdiction. The federal government is calling to protect 30 percent of all undeveloped land. On Cape Cod, our water quality issues have risen in unprecedented ways. Climate change impacts are painfully present daily around the world and in our own country. The JBCC may be doing wonderful restoration work on parts of the base, but this cannot be seen to offset the harm that destruction of over 170 acres of undisturbed pine barren forest over the top of our sole source aquifer will cause. Whether or not the EPA declares that the water quality meets their standards, we’re sure the EMC knows that it does not make the decision for you. The three (inaudible) are entrusted with protecting the permanent protection of the drinking water supply and wildlife habitat on the Reserve. You can only approve of compatible military activities. As the Faith Communities Environmental Network, 38 faith communities from across the Cape and Islands, we implore you to stand tall and do the right thing to protect these acres and the life, human and wildlife, that is dependent on clean water, clean air, healthy forests, and put an end to all types of pollution caused by the past use of the base. Do not allow any further harm. Please. Sincerely, Faith Communities Environmental Network.”

Ms. Carey read a letter from Keith Lewison of the Cape Cod Sierra Group and the Cape Cod Community Advisory Committee for Superfund Research Program: “Dear Mr. Pinaud, unfortunately, I cannot attend the CAC meeting due to other commitments. I have however been following the issues associated with the proposed MPMG at JBCC for the past several years. I found the process dishearteningly opaque and the Army’s reasoning questionable at best. As a Sandwich resident, I am extremely concerned that this project would have negative impacts on the drinking water protected by the Upper Cape Water Supply Reserve. Given the recent months of dry weather and drought conditions on the cape, combined with yearly increased demand for water and increased discovery of (inaudible) materials such as PFAS in our water across the Cape, the risk of any negative impact would be devastating across the region.”

Ms. Carey said that Mr. Lewiston goes on to ask to read an op ed from Tom Cambareri, a hydrologist on Cape Cod waters, formerly with the Cape Cod Commission. She will submit this.

Agenda Item #9. Adjourn – *Ms. Mimi McConnell, CAC Chair*

The meeting adjourned at 7:45 p.m.