

BARNSTABLE COUNTY COMMISSIONERS

SUPERIOR COURTHOUSE
3195 MAIN STREET
P.O. BOX 427
BARNSTABLE, MASSACHUSETTS 02630
PHONE: (508) 375-6648
FAX: (508) 362-4136

HOME RULED CHARTERED
IN 1989

RONALD BERGSTR
Chatham

MARK R. FOREST
Yarmouth

SHEILA R. LYONS
Wellfleet

Environmental Management Commission
Building 3468
Beaman Street
Camp Edwards, MA 02542-5003

September 15, 2021

RE: Proposed Multi-Machine Gun Range in the Upper Cape Water Supply Reserve

Dear Commissioners Amidon, Suuberg and Montgomery:

We are writing to urge you to reject the Massachusetts Army National Guard's proposal to construct a new Machine Gun Range within the Upper Cape Water Supply Reserve. As you may be aware, Barnstable County government was established to protect the natural resources of Cape Cod and the public health of its residents, which would be harmed by the proposed project.

Our reasons are as follows:

1. The project is inconsistent with the 1998 Base Master Plan developed by the Cape Cod Commission and the Community Working Group. This Master Plan was developed in partnership with the Weld-Celluci Administration and was intended to provide a consensus vision for the future uses of Joint Base Cape Cod, then referred to as the Massachusetts Military Reservation.
2. The project was vetoed and removed from the 1998 Master Planning process by then Governor Paul Cellucci - because his administration considered it to be inconsistent with the goals of protecting the Upper Cape's water supplies and the ecologically significant habitat documented in the new Master Plan.
3. The Environmental Assessment filed by the Massachusetts Army National Guard for the project is biased and lacks any objective independent analysis and or evidence to support its conclusions.
4. The proponents of the project have a history of hiding or covering up their proposals and opposing efforts by officials and environmental regulatory agencies -- including the

Environmental Protection Agency -- to investigate and remediate groundwater contamination from previous Army National Guard activities and training practices. Most of the improvements to natural resource management and clean-up of groundwater pollution have been the result of pressure and enforcement actions from environmental regulatory agencies.


5. The process for reviewing the project lacks transparency and, according to our Special Counsel, the project as proposed is illegal as it is inconsistent with the Act Establishing the Upper Cape Water Supply among other laws.
6. In the meantime, pollution emanating from the Joint Base Cape Cod continues to impact water resources and drinking water supplies in Upper Cape towns. In the case of Mashpee, for example, the military refuses to take full responsibility for its own actions, placing significant burdens on residents and taxpayers. The Upper Cape Water Supply Reserve was intended to be a resource for communities that need new drinking water supplies, especially in those cases where these resources are lost due to pollution from the military base.

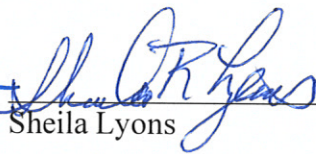
In closing, we oppose this project as it would harm the natural resources of Cape Cod and negatively impact the health and safety of its residents. Based on the analysis by our Special Counsel, the Barnstable County Commissioners are prepared to take legal action, if necessary, to protect the Upper Cape Water Supply Reserve.


We once again urge you to reject this misguided project.

Sincerely,

Barnstable County Board of Regional Commissioners


Ronald Bergstrom


Sheila Lyons


Mark Forest