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Acton Planning Board  
Town Hall  
Acton, MA 01720

Re: Quail Ridge Country Club (QRCC)

Dear Planning Board Members,

ACES has previously expressed concerns regarding the potential adverse human and environmental health effects of the proposed Quail Ridge Country Club. The site is located between two public water supplies (the Conant wellfield and Nagog Pond) and is also proximate to relatively dense residential areas in the form of apartments and single-family homes. ACES supports the Planning Board's ongoing efforts to ensure that this project's environmental impacts are properly mitigated.

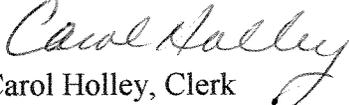
The Planning Board's original Conditions tied in, to a large degree, with this project's assumed acquisition of a Water Management Act Permit and Audubon International Signature Cooperative Sanctuary Program Bronze (or Silver) status. QRCC has recently stated that participation in the Audubon International Signature Program is an impossibility. While this may be the case, the AI program contains criteria that could be incorporated into conditions by the Town without other standards of the Sanctuary Program having been met. One of the primary ten standards pertains to pesticide storage buildings, fuel storage tanks, and equipment wash-down areas, as described in the attached excerpts. In August of 2002, the storage shed at Quarry Hills Golf Course in Quincy caught fire (see attached *Boston Globe* article), posing potential threats to human and environmental health. Per Brent Reagor of the Health Department, this condition would not come under the purview of the Acton's Hazardous Materials Storage Regulations. ACES urges the Planning Board to consider this subset of AI standards, as they are important public and environmental safety factors.

Water usage also appears to be an ongoing issue. An AI condition of approval includes monitoring of evapotranspiration (see attached excerpt). ACES believes that this condition would also be appropriate to consider as part of the environmental measures posed in lieu of AI Signature Cooperative Sanctuary certification. Further, the obtaining of a Water

Withdrawal Permit from the DEP should continue to be a condition of the special permit for QRCC. As of May 3, 2004, QRCC had not submitted water level data in accordance with their Administrative Consent Order, and the DEP believed that a 9-hole golf course and condominiums were to be constructed (see attached email from Barbara Kickham).

ACES remains concerned about the type and quantity of pesticides, herbicides, and other chemicals to be used on the golf course, and their potential impacts on environmental and human health. ACES is encouraged by the Planning Board's desire for a review of the final IPM plan by an independent and duly qualified environmental engineer, and hopes this review will also be conducted with AI's IPM and continual monitoring standards in mind.

Sincerely,

  
Carol Holley, Clerk

Enclosures

Cc: Board of Selectmen  
Conservation Commission  
Board of Health

below]. Maintain the vegetated buffer zones in the same manner around all water bodies after the course is completed.

6. Do not use turfgrass in areas where the game is never played (*e.g.*, backs of tees, between tees, beyond the reach of accepted guidelines for width of rough). Instead, use native and naturalized vegetation in those areas. Where shorelines of water bodies are in play, do not maintain closely manicured turfgrass all the way to those shorelines. Instead, within a 25-foot zone adjacent to any in-play portion of a shoreline, raise the mowing height to at least three inches, to allow the longer turfgrass to slow and filter runoff. (To the extent that a 25-foot-wide zone of three-inch or higher turfgrass cannot be maintained in a particular area, a narrower zone or lower minimum height of cut, as specifically justified to the satisfaction of the Signature Program Director, may be maintained.) [Note also the restrictions in Paragraph 5 above and Paragraph 8(e)(5) below on pesticide and fertilizer use within a 25-foot zone adjacent to water bodies.]
7. In areas where the game *is* played, use turfgrass that is consistent with accepted agronomic principles for the region of the country in which the property is located.
8. Prepare a written Integrated Pest Management Plan that includes and details:
  - (a) the specific pests for which the course will take management measures;
  - (b) the thresholds of tolerance prior to any management actions being taken;
  - (c)
    - (1) a list of cultural practices that will be used on the course when thresholds are exceeded;
    - (2) a list of all pesticide products (chemical, organic, *etc.*) to be used on the course, listed from least toxic to most toxic;
    - (3) a protocol that establishes the U. S. Environmental Protection Agency approved risk assessment procedure that was used to evaluate those pesticides;
  - (d) a description of scouting or other methods to be used to monitor pest activity;
  - (e) a signed agreement committing that the course management will:
    - (1) monitor pest activity on a regular basis,
    - (2) take corrective actions only if established thresholds are met, and then only the minimum actions necessary, and
    - (3) that the order in which these actions will take place is
      - (a) cultural,
      - (b) least toxic to most toxic, and
      - (c) most toxic only as a last resort;
    - (4) not use highly mobile and toxic materials within 50 feet of any water bodies;
    - (5) Establish special management zones around water bodies: the first (Special Management Zone A) runs landward 25 feet from the mean high water line; the second (Special Management Zone B) runs farther landward 25 feet from the outer edge of Special Management Zone A.
      - (a) Within Special Management Zone A, no pesticides may be used and only organic fertilizers may be used.
      - (b) Within Special Management Zone B, only a limited set of pesticides may be used, on the basis of the risk assessment mentioned in paragraph (c)(3) above; and only slow release or organic fertilizers may be used.

9. Any irrigation system must be a prescription system; in other words, a system that puts water only where it is needed, when it is needed, in the amount that is needed. The system must be equipped to monitor evapotranspiration.
10. An NRM must:
- (a) have a pesticide storage building with containment (*i.e.*, barriers or other system to prevent any spills from escaping), separate from the main maintenance building.
  - (b) have an enclosed pesticide mix/load area, with containment.
  - (c) have all concrete floors sealed with a more impermeable protective coating, such as paint or a clear sealant.
  - (d) have all floor drains routed through a filtration system.
  - (e) use natural lighting (*e.g.*, windows, skylights) to the extent practical, to minimize use of electric lights.
  - (f) have only above-ground fuel storage tanks, with containment, unless otherwise mandated by law, or specifically justified to the satisfaction of the Signature Program Director; and have a recessed or "lipped" fuel fill-up area, to contain any spills that may occur during fueling. Unless otherwise specifically justified to the satisfaction of the Signature Program Director, the entire fuel area must be under cover for protection from precipitation and from adverse impacts that can be caused by continuous exposure to the sun.
  - (g) have an equipment wash-down area, with containment, that either recycles rinse water for future wash-down or otherwise treats water before it is re-used either to irrigate turf or, as specifically justified and designed to the satisfaction of the Signature Program Director, to feed into a "created" wetland treatment system.
  - (h) have a used oil recycling system, with containment.
  - (i) present a clean, neat, and professional appearance at all times (*e.g.*, no junk/debris piled in or around the buildings).
  - (j) meet all applicable health, safety, environmental, zoning, code, or other regulations established by responsible local, state, or federal governmental agencies.

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FIRE CREWS KEPT FROM QUINCY BLAZE  
STORAGE BUILDING THOUGHT TO HOLD AN EXPLOSIVE MIX

Boston Globe, The (MA)

August 8, 2002

Author: Todd Wright, Globe Correspondent

**Estimated printed pages: 2**

Thick, black smoke billowed through blown-out windows and bright orange flames streaked to the sky, but more than 30 Quincy firefighters were forced to stand and watch yesterday as a large storage building packed with fertilizer and diesel fuel burned to the ground.

Officials from the state fire marshal's office, city fire commanders, and the state Department of Environmental Protection chose to let the two-alarm fire on the site of the new Quarry Hills Golf Course burn itself out because of the possibility of a huge explosion and potential risks to the environment.

"The worse thing we could have done was put water on that fire," said Quincy Fire Chief Paul O'Connell. "This was not your typical house fire."

No one was hurt and investigators haven't pinpointed the cause of the fire, O'Connell said. He added that firefighters had to resist their training - and the urge to douse the flames - to let the fire do its damage.

"It's hard for a firefighter to sit back and watch something like this. I got guys over there ready to jump in there," O'Connell said.

The fire was reported around 9 a.m. at a 30-by-50-foot tin storage building on Ricciuti Drive. When firefighters arrived minutes later, flames had already engulfed the tin building and a huge column of black smoke stretched 300 feet into the air.

Officials quickly learned that the storage building held a dangerous combination of materials: 6 tons of fertilizer, 500 gallons of diesel fuel, three 5-gallon containers of gasoline, and an undetermined amount of plastic pipe.

At first, fire officials thought the fertilizer contained ammonium nitrate, an inorganic compound that could explode if exposed to fire and gasoline. O'Connell feared that dousing the flames with water would cause the chemicals to mix and perhaps detonate. Ammonium nitrate was one of the key compounds used by Timothy McVeigh in the Oklahoma City bombing in 1995.

Almost two hours later, it was determined the fertilizer had an organic compound instead of ammonium nitrate, O'Connell said. Still, firefighters were advised not to use water on the flames because it might create an environmentally hazardous runoff that could pollute nearby creeks, trigger a toxic algae bloom, and place fish and animals at risk.

"By not putting the fire out, we've done wonders for the environment," O'Connell said.

Employees at the Quincy Auto Auction and Cahill Farmers Exchange were evacuated, but officials said that neighbors were in no real danger. Most employees left on their own after power was cut to nearby

buildings as a precaution.

Caption:

1. Quincy Fire Chief Paul O'Connell taking a breather as smoke rose from a storage building at the new Quarry Hills Golf Course. / GLOBE STAFF PHOTO / GEORGE RIZER
2. Firefighters monitoring a two-alarm blaze as it burned itself out yesterday morning. Officials feared that spraying water would cause a explosive mix or make for a hazardous runoff. / GLOBE STAFF PHOTO / GEORGE RIZER

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## Carol Holley

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**From:** Kickham, Barbara (DEP) [Barbara.Kickham@state.ma.us]  
**Sent:** Monday, May 03, 2004 4:49 PM  
**To:** Carol Holley  
**Cc:** Anderson, Paul (DEP)  
**Subject:** RE: Quail Ridge Country Club in Acton

Impacts to the Conant Well were taken into consideration during the pumping test design. This came up early in the process. Water levels in the Conant Well were measured during the pumping test. Given the distance, volume of water pumped, and that the QRCC well is in the bedrock, it was determined that there would be no measureable impact to the Conant Wells.

As far as we know they are not pursuing an 18 hole GC. They may have some hopes of getting enough members to build the championship course so they are still advertising. If they do, they will be in noncompliance with their Administrative Consent Order as they have not been submitting water level data. I am not sure what enforcement we will take if they don't pursue the 18 hole course. Rest assured they are still on my radar screen.

Thank you for your comments,

Barbara

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Worcester, MA 01608

-----Original Message-----  
From: Carol Holley [mailto:axebros@rcn.com]  
Sent: Friday, April 30, 2004 8:45 AM  
To: Kickham, Barbara (DEP)  
Subject: RE: Quail Ridge Country Club in Acton

Dear Barbara,

A former Acton Board of Health member has gotten interested in QRCC because he is concerned of the potential for negative impact on the Conant well field. He has asked me about the QRCC's progress in fulfilling the conditions of the consent agreement executed with DEP. I am, essentially, forwarding this request for an update to you. This gentleman was on the Board of Health during the WR Grace business in the late 70's through the 80's, and his concern has, frankly, renewed mine.

I was at a Board of Selectmen's meeting recently when Mr. Peabody discussed a 9-hole golf course on part of the land and senior housing on another part, but there are still ads for membership in an 18-hole country club running in the papers, so I'm somewhat confused. Further, the land is not zoned for a 9-hole course.

Please let us know if there are any new developments.

Thanks for all your help,