

Zoning Board of Appeals
ZBA 2015-83 Wellesley Country Club
March 10, 2016 7:30pm Town Hall

My name is Sarah Little and I have lived in Wellesley for 20 years. I have a Ph.D. in Geophysics from MIT. I spent 5 years as the Town of Wellesley's Pesticide Awareness Coordinator and 10 years working with a regional non-profit that trains professional landscapers in organic land management techniques. I was the project manager for their "Standards for Organic Land Care," and "Organic Lawn and Turf Handbook" and I wrote "An Introduction to Organic Lawns and Yards."

As Pesticide Awareness Coordinator I worked with the Health Dept., the Natural Resources Commission, the DPW and the Schools to create our Town's IPM plan that uses organic land management techniques and prohibits synthetic chemicals on all town-owned fields, parks, and water bodies except in health or environmental emergencies. Using this plan, Morse's Pond weed and algae problems are successfully managed with a weed harvester and a phosphorus filtering system upstream of the pond.

A separate state law, "An Act Protecting Children and their Families from Harmful Pesticides," requires IPM plans for all schools and prohibits the use of any carcinogenic pesticides. Four of these prohibited chemicals are in the WCC IPM plan.

In this law, SECTION 1. (a) "The general court finds that:

(2) pesticides contain toxic substances, many of which may have a detrimental effect on human health and the environment and, in particular, have developmental effects on children;"

Pesticides, a term which encompasses insecticides, herbicides, pre-emergents, as well as fungicides and other "-icides", are specifically listed in ZBA regulations as Toxic or Hazardous Materials.

Under Design and Operation Standards, Safeguards, "Provision shall be made to adequately protect against toxic or hazardous material discharge."

As a citizen of the town I would like to ask on this golf course project for the following items in order to adequately safeguard 1) our children who will be attracted to using the smaller, child-sized golf course, 2) our town's drinking water supply, and 3) the groundwater and surface water in the local environment:

1) **Install the Short Course with the organic golf course management installation methodology** to allow for a transition to organic management techniques sometime in the future if necessary. Organic management is a compelling option for this project because of it being: 1) Used by children, 2) a smaller area, 3) in a wellhead protection Zone II, and 4) having a potentially sympathetic client base of parents. There is a premier, 100% organic course on Martha's Vineyard. Successful organic management begins at the installation stage for any kind of organic turf.

2) **Use the monitoring wells to test for the chemicals that are actually applied.** Only one of the 25 chemicals on the state's drinking water list of Synthetic Organic Compounds list is used on the course, according to the WCC IPM plan. It doesn't make sense to test for chemicals that aren't applied. Conversely, it makes sense to test for chemicals that are applied, the 19 chemicals that aren't on the SOC list. This way the monitoring wells can be used as an early warning system to protect the town's drinking water from toxins that aren't regularly tested for. Miacomet Golf course on Nantucket is required to test the water in their monitoring wells for the chemicals used.

3) **Link a contingency plan to detection of chemicals in the monitoring wells**, such as re-examining the IPM plan, assessing the turf management needs, changing tolerance for pests, reducing the chemical use, and moving closer to organic management.

4) **Test any fill brought in from off-site** for heavy metals, petroleum and industrial hydrocarbons, solvents, and persistent organic pollutants.

5) I also have **concerns with excess nitrogen and phosphorus** application and run-off both from a health standpoint and because of the danger of accelerated eutrophication of surrounding streams and wetlands.

6) Finally, I would ask that you **consider the requests of the NRC** for transparency in reporting pesticide and fertilizer use to the NRC as well as in asking WCC to achieve the Audubon Cooperative Sanctuary Program Certification.

Sincerely,

Sarah Little
14 Montvale Rd
Wellesley, MA