

From: Thomas Palmer (citizens' group representative)
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To: Chris Ross
MA Dept. of Environmental Protection
Southeast Region Main Office
20 Riverside Drive
Lakeville, MA 02347

Date: December 17, 2009 (via email/PDF)

Re: **DEP file No. 124-1043 Canton/Ponkapoag Golf Course Drainage and Irrigation Improvements**

Dear Mr: Ross:

I have reviewed the letter dated December 10, 2009 from proponent DCR regarding our appeal of Canton Conservation Commission's June 27, 2009 Order of Conditions.

The letter asks that you affirm the Order as is, including wetland mapping which misrepresents approximately five acres of Bordering Vegetated Wetland on fairways 3, 7, and 8 of Course One as uplands.

The letter repeats DCR's original claim that the fairways are uplands, but provides no additional evidence in support of this assertion--namely, documentation of vegetation and other indicators of hydrology in the disputed areas. At the Conservation Commission hearing on June 17, 2009, the Commission was asked to require DCR to provide this information, but declined.

Similarly, when you walked the site with all parties on July 22, 2009, DCR's consultants were asked several times to point out the soil and vegetation indicators that caused them to map the fairways as uplands. They replied that they had no obligation to do so.

I suggest that DCR's obvious reluctance to specify conditions in these areas stems from its awareness that the conditions do not support its claims.

DCR's recent letter contends that its mapping is confirmed by documentation in the Notice of Intent. But that documentation is limited to single data plot in the fairways, a plot that was not located on plans and whose vegetation was simply described as "turfgrasses."

On July 27 and 29 of this year I sampled soils and vegetation at nineteen mapped locations on fairways 3 and 7 according to procedures described in the Department's delineation manual. I documented my findings with photographs and data forms that were provided to all parties on August 1. I found that soils were hydric at all nineteen plots, and that eighteen were dominated by wetland indicator plants. The DCR letter avoids any substantive discussion of these findings, simply stating (pg. 8) that "the portions of the fairways of holes 3, 7, and 8 that are mapped as upland were delineated this way due to the lack of the combination of hydrophytic vegetation, hydric soil, and wetland hydrology." If this is DCR's position, where is the supporting data?

Although the DCR letter repeatedly cites the Canton Conservation Commission's 6/27/09 Order of Conditions as evidence of a consensus that its mapping is accurate, Canton's conservation agent wrote a letter to all parties on August 1 declaring "I do not believe that anyone involved with the project believes that the area subject to the appeal is not wetlands."

In sum, you have considerable evidence before you that the disputed areas meet the definition of bordering vegetated wetlands, and little or none that they do not. We ask that you not affirm proponent DCR's wetland mapping until its accuracy has been demonstrated by the data collection techniques recommended in the Department's wetland delineation manual--namely, a series of transects documenting soils and vegetation on both sides of the proposed wetland boundaries, and including the area of the contemplated detention pond.

The DCR letter further suggests that even if the disputed areas are wetlands, "the Petitioner offers no evidence that Statutory Interests will be adversely affected by the proposed project." But if fairways 3, 7, and 8 are wetlands, they have already been determined to be significant to these interests when they were included in the Fowl Meadow and Ponkapoag Bog Area of Critical Environmental Concern. In the August, 1992 designation of the ACEC, EOEA Secretary Tierney wrote:

I also hereby find that the wetland resource areas included in the Fowl Meadow and Ponkapoag Bog ACEC are significant to the protection of groundwater supply and public and private water supplies, the prevention of pollution, flood control, the prevention of storm damage, the protection of fisheries, and the protection of wildlife habitat - all of which are public interests defined in the Wetlands Protection Act and regulations promulgated thereunder.

Similarly, the Department's preface to the 1983 regulatory revisions, which added wildlife habitat to the protected interests, states:

It is also the Department's view that while engineering solutions can protect the statutory interests at stake in most projects located in or near banks, floodplains and land under waterways and water bodies, this is not the case with bordering freshwater wetlands. The complex natural functioning of these wetlands cannot be replicated, and no amount of engineering will enable such areas to be filled or substantially altered without seriously impairing the statutory interests they serve.

Did DCR consider these statements before it proposed to eliminate the wetlands via filling?

Before I close I would like to comment on DCR's repeated assertions that the wet and sunken fairways at issue "were designed by Donald Ross, the dean of American golf course architects."

There is considerable evidence that famed architect Ross had nothing to do with these holes, which were constructed circa 1938, several years after the original eighteen--which most sources, including the Donald Ross Society website, identify as the only ones Ross is responsible for. For instance, the recent comprehensive study by Ross scholar Bradley S. Klein, *Discovering Donald Ross: the Architect and his Golf Courses* (Sleeping Bear Press, Chelsea, MI; 2001) states on pg. 196:

A year later [1932], Ross's design for 18 holes at Ponkapoag Golf Club in Canton, Massachusetts, opened for play. The public course, undertaken by Boston's

Metropolitan District Commission, was located 14 miles south of downtown and was ultimately expanded in two subsequent phases (1938 and 1956) to 36 holes. Ross's original handiwork is evident today as the front nine of Course No. 2 and holes, 1,2,9,10,14,15,16,17, and 18 of Course No. 1. Not surprisingly, Ross selected the best uplands and avoided the areas for wetland soils. His greens are gently tipped toward the line of play, with many of them displaying the telltale crown at the back that was Hatch's trademark. By contrast, the 1938 greens all betray the same look of three framing mounds. The contrast with the original putting surfaces is marked, as is the soil for these newer holes, which in nearly every case were the peaty wetlands that Ross knew to avoid.

Attached to this letter is a map of the existing 36 holes with Ross's original 18 hole design, as described above, outlined in red. If DCR truly wants to restore Ross's vision, it should focus on the holes he created, and avoid refilling fairways 3, 7, and 8 of Course One, which were built in wetlands and are wetlands today.

Very truly yours,

Thomas Palmer

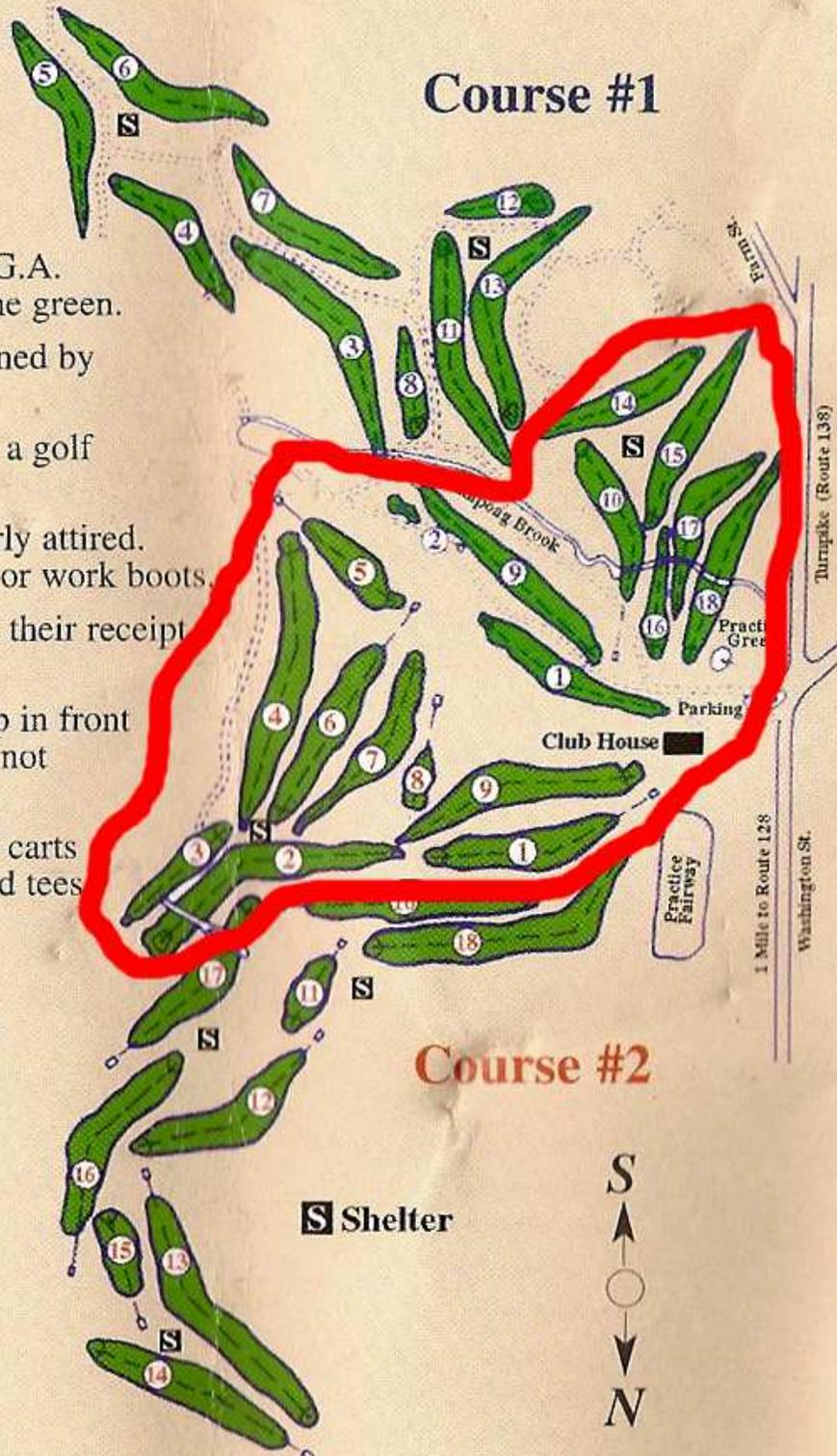
A handwritten signature in black ink that reads "Tom Palmer". The signature is fluid and cursive, with a long horizontal stroke at the end.

on behalf of Citizens of Canton

cc: Mike Misslin, DCR (email/PDF)
Canton Conservation Commission (email/PDF)
Steve Pearlman, Neponset River Watershed Association (email/PDF)

Department of Conservation and Recreation

- U.S.G.A. rules govern all play.
- Please rake bunkers, repair ball marks, and replace divots.
- All yardages are measured from the M.G.A. plate to the center of the green.
- Out of bounds are defined by white stakes.
- Each player must have a golf bag and clubs.
- Golfers must be properly attired. No tank tops, cut offs, or work boots.
- All players must retain their receipt at all times.
- Keep up with the group in front of you. Slow play will not be tolerated.
- Keep all drive and pull carts 30 feet from greens and tees.
- Private coolers are not permitted.
- Rangers are authorized to enforce all rules.



M.G.A. Course/Slope Ratings

Course #1		Course #2	
BLUE	72.0/126	BLUE	70.3/116
WHITE	69.8/120	WHITE	67.5/112
RED	70.8/115	RED	68.5/113