



COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
Metropolitan Boston – Northeast Regional Office

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Acting Commissioner

May 19, 2003

Bill Webb, President  
Thomson Country Club  
20 Elm Street  
North Reading, Massachusetts 01864

RE: Water Management Permit Review # 9P2-3-17-213.01

Dear Mr. Webb:

The Massachusetts Department of Environmental Protection (the "Department" or "DEP") has completed its review of all the water withdrawal permits issued in the Ipswich River Basin, including the Permit issued to the Thomson Country Club (the "Club"), Permit # 9P2-3-17-213.01 (the "Permit"). The Permit, as issued in 2000, did not authorize additional volumes beyond the average daily volume of 0.15 million gallons per day (MGD) for 210 days, for a total of 31.5 million gallons per year MGD, that the Club is previously registered from the Ipswich River Basin.

When the Permit was issued in 2000, the Department intended to require the permit holders in the Ipswich River Basin to file for future permit review. The Department delayed that requirement until the United States Geological Survey (USGS) had completed its studies of streamflow and habitat in the Ipswich River. After these studies were nearly complete, on December 13, 2002, DEP issued an Order to Complete requiring the Club to submit additional information. The Club responded to the Order to Complete on March 11, 2003. The Department has reviewed the information from the USGS studies along with the Club's response to the Order to Complete and has issued the Modified Permit (enclosed herein) that reflects a balance between the public's need for a safe and reliable source of drinking water and competing environmental, economic and recreational interests.

As a result of this review, the Department has determined that there is documented evidence that water withdrawals, and to a lesser extent and increase of impervious area and development, along with the export of wastewater to other basins substantially contribute to low flow in the Ipswich River. These low flows significantly impair the ability of the river to

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function as a habitat for aquatic life and wildlife that are adapted to riverine conditions, an area for primary and secondary contact recreation, and a reliable source of safe drinking water. This Modified Permit requires that water conservation measures be employed and that water use restrictions be implemented based upon streamflow triggers. The Department has further determined that since 1997, the Club's actual water withdrawal has been within the authorized volume.

DEP has further determined that unless and until conditions in the Ipswich River significantly improve, it is unlikely that any permittees in the Ipswich River Basin will be approved to increase their authorized withdrawals. In these circumstances, it is essential that all permittees keep their withdrawals at or below their authorized volumes.

#### Proactive Actions by Thomson Country Club

The Department wishes to commend Thomson Country Club for their prioritization of conservation efforts that has in fact reduced their water consumption in recent years. Daily monitoring of soil moisture is conducted by hand probes and computerized irrigation is performed in the evenings with supplemental hand watering in the mornings. Other Best Management Practices are utilized including: the use of wetting agents; the use of growth regulators; leak detection and repair. The Department has previously determined that the lining of the irrigation pond was not practicable.

To enable the Club to comply with the Modified Permit, DEP intends to review at least annually the progress that each permittee has made in complying with the requirements of the Modified Permit. Moreover, DEP will take whatever action it deems appropriate to bring permittees into compliance with the modified permits, including without limitation requiring more stringent restrictions, further modifying the permits in the Ipswich River Basin, and/or initiating enforcement actions with or without the assessment of civil administrative penalties. That being said, DEP remains committed to working with the Club and all the Ipswich River Basin permittees so that the Ipswich River may once again sustain all its uses as a habitat for aquatic life and wildlife that are adapted to riverine conditions, a place for secondary and primary contact recreation, and a reliable source of safe drinking water.

#### Procedure for Appeal

Thomson Country Club has the right to appeal the Modified Permit in accordance with 310 CMR 36.40. Any such appeal must be received by the Department within twenty-one days of the date of receipt of the Modified Permit. Only the portions of the Modified Permit which reflect a modification of the Club's current permit may be the subject of an appeal, since the period for appealing provision within the Club's current permit has expired.

If you have any questions regarding this permit, please contact Zachary Peters at (978) 661-7736. Please note that the Northeast Regional Office of DEP will be moving in mid to late June to One Winter Street in Boston. Please check our website [www.state.ma.us/dep/nero](http://www.state.ma.us/dep/nero) for latest updates.

Very truly yours,

Madelyn Morris  
Deputy Regional Director  
Bureau of Resource Protection

MM/zap

Enclosures: Water Withdrawal Permit  
Certified Mail/Return Receipt Requested

cc: Duane LeVangie, DEP, Water Management, Boston  
Karl Heintzelman, Golf Course Supt., Thomson Country Club, 20 Elm Street,  
North Reading, MA 01864