

March 2, 2023

P567102 Millersville Park- Aquifer Study Comments

The following is in response to the comments received during the comment period for the Aquifer study that was posted online.

Summary

1. The data support the report’s conclusions that the underlying aquifer can meet the water supply demand of the proposed project and that the soils can accept the effluent from an on-site septic system.

Response: Comment noted

2. The report’s implications that the volume and nitrogen content of site runoff will not cause problems for streams are not supported. The study is not a thorough analysis of site runoff and incorrectly assumes that sports fields are pervious. Also, it’s not appropriate to imply that nitrogen loads are acceptable because they are below the high levels released by farmland—this “low bar” is not the right standard for our county parklands.

Response: The Hydrogeologic Feasibility Evaluation was conducted to address concerns about adverse impacts on the subsurface aquifer from the planned park. The report examined the feasibility of developing on-premises groundwater supply and discharge systems. The report did not examine or comment on surface runoff.

Details

3. The athletic fields should not be treated as pervious areas like natural grasslands. Maryland DNR says that the highly compacted soils of sports fields can act as impervious surfaces and contribute to stormwater problems in streams.

Response: Comment noted. Refer to Response #2. MDE is the State agency has jurisdiction over the stormwater design requirements for this project. The County follows all county, state and federal guidelines for the management, which includes quantity and quality, of stormwater runoff. The site will be designed in accordance with current (2008) MDE stormwater management regulations. The cited statement that “sports fields can act as impervious surfaces” is true if the fields are not properly managed. “Highly compacted” soils can lead to a loss of turf. The County avoids this problem by proper field maintenance, which includes mechanical aeration and/or soil additives (gypsum) to prevent the over-compaction of soils. This evident by the lack of standing water in the fields and the health of the grass (it is not drowned)

4. The nitrogen and sediment loads from the proposed park should not be compared to those from agricultural land. The land has not been farmed for 4 or 5 years and is currently treated as a less polluting land use (“turf grass” and “mixed open”) in Maryland’s nutrient management tools. DRP should adopt a

higher standard for our parklands than just being less polluting than farmland.

Response: Comment noted. The Department of Recreation and Parks determines the type and amount of fertilizer needed to be applied on the Bermuda fields based on soils testing. There are guidelines that legally must be followed as to how much of the Nitrogen applied would be slow release versus quick release. The fertilizer we use exceeds the minimum required to be slow release. The Department applies less fertilizer than industry standards of four times a year. The Department fertilizes based on soil needs rather than a pre-determined suggested amount. Last season this was once a year. It should also be noted that the fertilizer used does not contain Phosphorous and is applied by licensed professionals.

5. Millersville Park drains to Sewell Spring and to Jabez Branch, which has been designated for special ecological protection by the State and the County. Those streams have had years to recover from farming activity on the site; and the State, County, and others are restoring part of Jabez Branch. Increased pollution from converting fallow land to sports fields must not be allowed to undo past recovery and ongoing restoration efforts.

Response: Comment noted.

6. Would four toilets and two urinals really be sufficient for the users of such a large field complex?

Response: Currently comfort stations are only located in parks where there is a user group assigned to that location. The County does not install comfort stations in community parks. As the County does not intend to assign this field to a particular organization, and this will be a designated community park, comfort stations will not be built at this time. The County would supply portable toilets for public use during athletic seasons, primarily March through October.

7. The site map showing 5.5 fields would intrude into forested/wetland areas to the northwest of the site that DRP has previously committed to keep in natural status.

Response: This comment is noted. This was stated during the design of a tennis concept. The final layout has not been determined at this time and consideration could be given to this during the design phase.

8. Table 2 reports that the site currently has 13.1 acres of baseline forested area, but the future land use reports no forested area. This would seem to be a violation of the County's Forest Conservation Act.

Response: Forest conservation will reviewed once a final design is determined. The project will comply all forest conservation regulations that are applicable when the project is submitted for permit.

