



Maryland Chapter

7338 Baltimore Avenue, Suite 102

College Park, Maryland 20740

October 2, 2018

Dr. Wallace D. Loh, President
University of Maryland
1101 Main Administration Building
College Park, MD 20742-6105

Dear President Loh,

We are writing on behalf of the Maryland Chapter of the Sierra Club in opposition to the University's proposal, circulated in a powerpoint presentation by Vice President Colella, to construct playing fields, a 600-space surface parking lot, and a track and field complex on the University Golf Course. The Sierra Club is the nation's largest and oldest environmental organization. The Maryland Chapter has more than 70,000 members and supporters, including UMD students, graduates, and faculty and neighbors of the College Park campus. The Maryland Chapter office is on Knox Road, across from the University Campus. Since we became aware of this proposal in August, we have been researching the justification for and the environmental sustainability of the golf course and other proposed uses.

We are surprised that the proposal exists only as a powerpoint presentation showing alternative locations for the facilities,¹ not as a written proposal with a justification based on the University's Facilities Master Plan (FMP).² The 2011-2030 FMP was drawn up over several years with the help of consultants and committees of University faculty, staff, and students, based on background papers and surveys.³ It "... projects a future for the campus to realize fully its mission and meet the mandates of... the Environmental Stewardship Guidelines (2003); the University Strategic Plan (2008); and the University of Maryland Climate Action Plan (2009)."⁴ It also responds to "... new state and federal regulations regarding stormwater and wastewater, ... and the need for an increase in recreational space for students."⁵ The 2017-2030 Update⁶ was approved by the Board of Regents in February 2018. Proposed facilities should be grounded in this document, and departures from the plan should be justified with new evidence.

Based on our research, presented in an Annex to this letter, we conclude that this proposal to construct playing fields, a track and field complex, and a surface parking lot on

¹ Carlo Colella, UM Vice President for Administration and Finance. "University of Maryland: Track and Field Relocation and New Recreational Fields," powerpoint presentation for the Friends of the Golf Course, 7/24/2018. A call to his office confirmed that there is no formal proposal document behind this presentation.

² University of Maryland. 2011. "Facilities Master Plan 2011-2030." (*Henceforth FMP.*)

³ FMP, Appendix G: Facilities Master Plan Committees, Charge and Member List (pp. 150-154).

⁴ FMP, p. 1.

⁵ *Ibid*, p. 1.

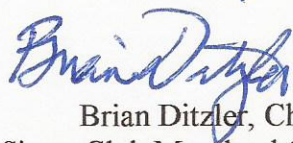
⁶ University of Maryland. 2018. "Facilities Master Plan: 2017-2030 Update." (*Henceforth Update.*)

the golf course cannot be justified on environmental sustainability grounds, nor is it consistent with the principles and proposed projects in the FMP or the Update.

- We note and adopt the observations, concerns, and evidence of the adverse environmental impact of the proposal on the restoration of the Anacostia River in the letter signed by the Anacostia Watershed Society, the Anacostia Riverkeeper, the Audubon Naturalist Society, the Potomac Conservancy, and other environmental groups.
- The golf course is an environmental and community asset and is being maintained sustainably. The FMP and Update designate it as one of eight campus Districts, to be retained as a golf course, with investments in improvements and maintenance over the planning period. There is no proposal in the FMP to construct new playing fields, a track, or surface parking on the golf course. The proposal under consideration would reduce its environmental benefits, increase runoff, reduce wildlife habitat, and possibly result in eliminating the viability and existence of the golf course.
- Four additional playing fields are already proposed by the FMP and Update to be located on Fraternity Row. Others are authorized on the roof of a parking garage.
- There is no evidence or support from the FMP for building a 600-car surface parking lot anywhere on campus. To the extent that parking is supported by the FMP, it is entirely structured parking. However, the FMP did not study the impact of the three Purple Line stations on parking demand, which in theory could reduce the demand for *all* new parking.
- The Purple Line alignment is compatible with leaving the Kehoe Track in place; Metro is willing to finance moving the field events area to the southwestern side of the Track.

Finally, we also have concerns about the lack of transparency on the source of the proposal, its justification, and the approval process. A world-class university such as the University of Maryland should be a model for transparency and evidence-based decision-making. We ask the University to clarify: the specifics of the proposal; the justification and evidence to support it; the timetable and process for public discussion, review, and decision-making; and why it seems to fly in the face of a carefully drafted and recently updated Facilities Master Plan.

Sincerely,



Brian Ditzler, Chair
Sierra Club Maryland Chapter



Martha Ainsworth, Chair

Prince George's Sierra Club Group

Annex: Findings on the Golf Course and the Proposed Facilities

cc: Dr. Mary Ann Rankin, Senior Vice President, Academic Affairs and Provost
Mr. Carlo Colello, Vice President for Administration and Finance, Chief Business Officer
Dr. Linda Clement, Vice President for Student Affairs
Ms. Amy Eichhorst, Executive Director, University Alumni Association
Mr. Norman Starkey, Chair, Maryland Golf Course Coalition

ANNEX: Sierra Club Findings on the Golf Course and the Proposed Facilities

The Golf Course

The proposal presented by Vice President Colella to place these facilities on the golf course (in four alternative configurations) would reduce it from a championship 18-hole course to either 9 or 14 holes. The surface area impacted and the amount of impervious surface introduced on the golf course is not included in the proposal. It would clearly require leveling much of the undulating terrain, removal of some forest, and damage to significant wetlands.

The FMP describes a 301-acre Golf Course District, one of eight districts on the main campus. It notes that:

“The University Golf Course and its woodlands (7.68 acres of which are in Forest Conservation Easement) are the upland areas of the Campus Creek headwaters and watershed, and thus part of the watershed and wildlife corridor of Campus Creek and the Paint Branch. The course was chartered as an Audubon Cooperative Sanctuary in 2002, and it has retained its Audubon Certification for the past nine years. The 150-acre University Golf Course boasts over 27 documented species of trees, 11 different mammals, and 28 different birds, and there are plans to build upon this diversity.”⁷

Sierra Club representatives toured the course and received substantial documentation of its sustainable management, primarily using Bermuda grass that requires very little water and fertilizer.⁸ They observed abundant wildlife, a Monarch sanctuary, forested areas, wetlands, two ponds, waterways, and three rain gardens built in the Club House parking lot with funding from the Chesapeake Bay Trust, the Prince George’s Department of the Environment, and the Anacostia Watershed Society, to capture stormwater runoff. The course is maintained in conformance with the Standard Environmental Management Practices developed by Audubon International for application to golf courses. The University Golf Course is one of 19 International Certified Audubon Cooperative Sanctuary Golf Courses in Maryland.⁹

The FMP and Update propose new investments to maintain and improve the Golf Course.¹⁰ They make no mention of any plans to reduce the size of the golf course or to build playing fields, parking, or a track in that district. Doing so would reduce forest cover, increase impervious surfaces and polluted stormwater runoff, destroy wildlife habitat, create light and

⁷ FMP, p. 104.

⁸ (1) “Best Management Practices/Golf Course Sustainability: University of Maryland Golf Course.” Undated. (2) Dr. Thomas Turner, Turfgrass Specialist, “Nutrient Management Guidelines for Golf Courses in Maryland” *University of Maryland Turfgrass Technical Update* TT118-December 2013, University of Maryland Department of Plant Sciences & Landscape Architects.

⁹ “Best Management Practices/Golf Course Sustainability: University of Maryland Golf Course.” p. 1.

¹⁰ An indoor driving range (GC1) in 2017-2020; golf course maintenance (GC2) and grounds maintenance replacement (GC3) in 2021-2030 (Update, p. 36). Renovation is planned of the Indoor Practice Facility (Bldg 309) in 2021-2030 (Update, p. 39). Planned landscape improvements for 2021-2030 include: (GC_L1) Holman Short Game Expansion; (GC_L2) Golf Course Ponds and Storm Water Management Improvements; and (GC_L3) Perimeter Landscape Improvements, University Boulevard and Adelphi Road (Update, p. 40)

noise pollution, and impact wetlands. It would violate many key priorities, recommendations, and principles of the FMP and the Update:

- Stewardship strategic priority: "...the university... plays a significant role in protecting the land and environmental features that are of major importance to the regional ecology."¹¹
- Sustainability strategic priority: "The university will continue its national leadership in sustainability. ...[it] will serve as a laboratory and model for best practices. ...efficient management of wastewater and stormwater runoff, and reduction of carbon emissions are among our goals."¹²
- Recommendations on Environmental Stewardship and Sustainability:¹³ "Design with educational opportunities in mind to maximize use of campus as a living laboratory of sustainability best practices and to become a model sustainable community." "...conserve and interpret the campus forest as a key component of the Climate Action Plan." "Increase the ability of the campus natural hydrologic cycle to deal appropriately with stormwater runoff."
- Physical Planning Principles: "The campus plan will protect and enhance existing natural environments (woodlands, wetlands, and floodplains) and create connections with adjacent habitats."¹⁴ "Campus design will affirm the essential importance of open spaces—natural areas, lawns, malls, plazas, patios, places to sit, etc.—to the image, organization, and quality of the campus environment."¹⁵

In summary, there is no support in the FMP or Update or among environmental experts to construct the proposed facilities (playing fields, track, surface parking lot) on the golf course.

Surface Parking Lot

Given that the campus is near a Metro station and will soon be accessible to three Purple Line stations, the most puzzling aspect of the proposal is the request for a 600-space surface parking lot. Whether on the Golf Course or elsewhere on campus, this would increase impervious surfaces, exacerbate stormwater runoff, encourage automobile use, and increase greenhouse gas emissions. It would seem to be the least justifiable part of the proposal.

The FMP and Update discourage use of private cars and recommend that additional parking be accommodated in structured parking garages.¹⁶ The Update describes no planned

¹¹ FMP Update, p. 18.

¹² *Ibid*, p. 18.

¹³ *Ibid*, p. 26.

¹⁴ *Ibid*, p. 22.

¹⁵ *Ibid*, p. 23.

¹⁶ "...transportation demand management strategies have been implemented to reduce the number of personal vehicles needing to park on campus. Parking spaces total 17,399 and are projected to reduce by 920 by 2019. Structured parking garages with some parking combined with new facilities are proposed as the solution for future parking demand." Update, p. 30. "Encourage the Use of Transportation other than Personal Vehicles: Plans for development will reduce the number of automobiles on campus and encourage alternative modes of transportation—shuttle busses, bicycles, new light rail or Metro line – in order to minimize vehicular congestion and support the Climate Action Plan and campus sustainability priorities." (*Ibid*, p. 22) Three of the 13 recommendations for the vehicular and pedestrian circulation systems are: (1) "Install infrastructure which supports and enhances the use of

construction of surface parking, and no construction of *any* parking from 2017 to 2020. For 2021 to 2030, it proposes construction of the Paint Branch Parking Garage, phases 1, 2, and 3, for a total of 900,000 square feet, and the Campus Drive Parking Garage with 2,200 spaces and 660,000 square feet.¹⁷

However, it appears that the original FMP did *not* do any calculations on the impact of the Purple Line stations on or near campus on the demand for parking, so that even these two proposed garages may not be necessary. A single table in Appendix D, entitled “Parking Impact,” estimates the lost spaces at existing facilities because of planned new construction projects – a total of 3,304 spaces.¹⁸ There’s a line to include the reduction of parking demand due to the Purple Line, but no number – “input needed from MTA” is noted.

Thus, the need for additional parking has not been demonstrated; it would be prudent to await the arrival of the Purple Line in 2022 to assess the need. If the Purple Line and other planned transportation investments within the campus are not sufficient to meet expected demand, the FMP says it should be provided in structured parking. There are already two locations for structured parking highlighted in the FMP, and neither is on the Golf Course.

Playing fields

At his presentation in August, Vice President Colella maintained that there is an enormous deficit in the number of playing fields that can be used for club and intramural sports. He was unable to provide the current number of playing fields, to explain how many more would be needed to meet demand, or how greater use of existing under-used varsity team fields might be able to meet that demand. The depictions in his powerpoint presentation advocated from 1 to 4 additional fields on the golf course or alternative locations; in response to a question posed by the Sierra Club, he could not say whether this proposal would entirely satisfy the unmet demand.

The FMP and Update do not quantify the need for additional playing fields, but they do propose construction or upgrading of additional fields: (1) four artificial turf fields on Fraternity Row in 2017-2020;¹⁹ and (2) additional fields in the 2021-2030 time frame, some of them on the roof of the future Paint Branch Parking Garage.²⁰ Beyond this, the FMP and Update commit to expansion and upgrades of numerous facilities for field hockey, soccer, lacrosse, baseball, softball, football, volleyball and/or basketball.²¹

transit.” (2) “Provide programs and practices to encourage the use of transit, carpools, and other alternatives to single occupancy vehicles.” (3) “Reduce personal vehicle congestion on campus.” (*Ibid*, p. 28)

¹⁷ FMP Update, p. 36. No mention is made of the projected number of spaces in each of the three phases of the Paint Branch parking garage.

¹⁸ FNP, Appendix D: Parking Impact, p. 147.

¹⁹ E_L2: “Fraternity Row—multi-field layout, artificial turf (4 fields)” Update, p. 40.

²⁰ N_L2: “Recreation Fields on Paint Branch Parking Garage Roof” (Update, p. 40); NW_L4: “Multi-Sport Recreation Field (220 x 150’, artificial turf)” (Update, p. 41).

²¹ For the period 2021-2030: (N7) “Field Hockey and Lacrosse Complex Expansion”; (N10) “Robert E. Taylor Stadium Expansion” (softball); (W2) “Ludwig Soccer Stadium Upgrades (12,000 – 18,000 seats)”; (W4) “Shipley Field Upgrades” (baseball); (N_L7) “ICA/RecWell Field (infield of track)” (football & soccer); (NE_L7) “Outdoor Volleyball Courts (4 sand or artificial turf, 50’ x 80’ each, including buffer)”; and (NW_L5) “Volleyball and/or Basketball Courts” (Update, pp. 36-37, 41).

If there is immediate demonstrated need for additional playing fields, the FMP says they should be built on Fraternity Row. There is no need to place them on the Golf Course, where they would inflict environmental damage and diminish the utility of the Course. Allowing club and intramural sports to use the varsity sports fields, which are under-used, would provide almost immediate relief for any shortage of playing fields, at little additional expense.

Track relocation

Vice President Colella's powerpoint presentation included re-location of the Kehoe track at Ludwig Field because of its proximity to the Purple Line, which would impinge on the area for field events. However, the rationale for that part of the proposal is undermined by the second slide of the presentation, showing the current track and field location in relation to the Purple Line route. The only part of the complex that is affected by the Purple Line is the field events area. The slide shows an area southwest of the Kehoe Track where the field events could be moved, and Metro reportedly has agreed to finance this displacement. The FMP and the Update propose construction of "(W2) Ludwig Soccer Stadium Upgrades (12,000 to 18,000 seats)" *at its current location* for the 2021-2030 time frame.²²

Thus, no reason has been formally articulated for the Kehoe Track to be moved from its current location; the field events area can be displaced to the southwestern side of the track, and the future soccer stadium upgrades can be accommodated at Ludwig Soccer Stadium's current location.

²² FMP, p. 78; Update, p. 37.