

STORMWATER PARTNERS NETWORK OF MONTGOMERY COUNTY



Montgomery County Planning Board Hearing

Downtown Silver Spring

Project Plan Amendment: 91998005C, Site Plan Amendment: 81999002M

June 18, 2020

Dear Chair Anderson and members of the Planning Board,

We, the Stormwater Partners Network of Montgomery County,¹ hereby submit this targeted testimony regarding the use of synthetic plastic turf carpet (Synturf, and specifically in this case SYNlawn's SYNTipede 343 product) on the pedestrian plaza of Ellsworth Drive. Overall, we strongly support the idea of continuing to invest in Ellsworth Drive as the heart of a walkable, livable, downtown Silver Spring. The farmers market, festivals, and other neighborhood amenities draw people to this transit-accessible area. **But we oppose glueing synthetic turf to the road surface for the following reasons:**

- We recognize that the SYNTipede product will be used without an underlying layer of padding or crumb rubber bits, which is most commonly seen as the microplastic pollution that comes from turf fields. However, even without the crumb rubber particles, the "blades" of artificial grass themselves will detach, degrade, and flow into the storm drains. While we understand that the Department of Environmental Protection has tested and found that the storm drain settling tanks should capture the majority of large particles, there will no doubt be some that escape into Sligo Creek.
- Additionally, DEP has not conducted any chemical testing to identify degraded microplastic particles smaller than the existing filter sizes nor any dissolved component chemicals, such as from the underlying adhesive, that may flow with the water into the creek.
- We are also concerned about the cleaners that may be used, such as antimicrobials or fabric softener being used. Generating such "non-stormwater discharges" would be a violation of the county MS4 permit, and these types of pollutants would not be trapped by a particulate settling tank.

¹ The Stormwater Partners Network is composed of organizations and individuals who support more effective stormwater policies and management in Montgomery County, MD, with the goal of clean and healthy streams throughout the county. We currently represent 36 organizations active in Montgomery County. A full list of our current membership can be found on our website.

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- Any of these particles and constituent chemicals may flow into Sligo Creek, then the Anacostia River, and then the Potomac River and the Chesapeake Bay. Some of them are known, and others are untested, hazards to aquatic life once ingested or absorbed.

Since 2010, Stormwater Partners Network has been concerned about the use of artificial turf products in Montgomery County and at that time issued a resolution requesting a moratorium on the use of artificial turf fields. That moratorium resolution² is attached to this letter and all the concerns described therein still apply.

We support the additional, more detailed testimony delivered by our individual and member organizations on this topic, including Friends of Sligo Creek and Safe Healthy Playing Fields, Inc.

If you have any questions, please contact Jeanne Braha (jbaha@rockcreekconservancy.org) or Eliza Cava (eliza.cava@anshome.org), co-chairs of the Stormwater Partners Network.

Sincerely,

Eliza Cava, Director of Conservation, Audubon Naturalist Society

Jeanne Braha, Executive Director, Rock Creek Conservancy

Co-Chairs, Stormwater Partners Network

² [Stormwater Partners Network \(2010\). Resolution on Artificial Turf.](#)