

From: [Leanne McAuliffe](#)
To: [Clerk](#)
Subject: Public Comment Item #9 - Council Meeting 02/06/2024, 7:00pm
Date: Tuesday, February 6, 2024 8:05:52 AM

[EXTERNAL SENDER]

Council Members, thank you for allowing this public comment.

Re: Replacement of Artificial Turf (AT) at Creekside Park.

Why would our town spend \$1 Million on another artificial turf that will almost definitely not meet future regulations? Aside from the fact that this plastic carpet sheds micro and nano plastics into the environment over its entire lifetime, every artificial turf sample tested by The Ecology Center and Dr Graham Peaslee of Notre Dame University has tested positive for PFAS. PFAS are the 14,000 or so "forever chemicals" we are constantly hearing about which are being linked to cancers, infertility, reduced immunity, among others.

Three PFAS are already on the Prop 65 list. (and have been found in AT.)

The EPA is considering classifying 9 as hazardous (eight of which have been found in AT).

Governor Newsom recently vetoed a bill that would regulate PFAS in artificial turf. He did so not because he didn't agree with it but because AB1423 was devoid of any regulatory oversight. So he has passed the issue to the Department of TOXIC Substances Control who are studying artificial turf with a view to regulating it.

The reason for these regulations is to prevent pollution of the air we breath, the soil that supports biodiversity and the water we drink. This is the environment our developing children are dependent on. Developing children are most susceptible to the negative effects of any toxic exposures, via inhalation, ingestion and dermal absorption.

Please pause on artificial turf and sincerely investigate replacing the field with natural grass for the health of our community (especially our children) and the environment. New hybrid grasses are drought tolerant and more resistant to wear which were the old arguments against natural turf.

If anyone tells you artificial turf fields don't shed, ask for the warranty. Many state 50% blade height loss over 8 years is reasonable and not covered. So 50% of the petrochemical derived, PFAS laced blades are "lost" into the environment (and our kids) and that's acceptable according to the artificial turf industry.

If anyone tells you a product is PFAS free, ask for the data. Ask for 3rd part independent testing by leading experts. Industry generally only tests for 70 or so PFAS and often only to parts per million which is not sufficient enough to claim "PFAS free".

To put that into perspective, the EPA advisory for drinking water equates to **0.000000004 ppm**. (= 0.004 parts per trillion).

The artificial turf industry requested **100ppm** limits for AT. This equates to **100,000,000 ppt**.

PFAS and microplastics are not the only issue with artificial turf. There are many reasons that make artificial turf a bad choice which I'm happy to provide information on. Please consider natural turf.

Leanne McAuliffe

Resident of Los Gatos and parent of four.

Side note: There is also reference to a community group contributing up to \$200K for the new carpet. Please make it clear to the whole community what conditions are attached to this contribution. Would Creekside still be a community field or only for that community sub-group? It is essential the field be fairly available to the whole community and not just a sub-group. If you allow the sub-group to choose the new surface and monopolize use then might the ratio of contributions be the wrong way around?

Dear Council Members,

My concern is [artificial turf](#) and its negative impact on the environment and our children. (See the [letter](#) from the Santa Clara County Medical Association to Saratoga High School.) Because the artificial turf industry is unregulated, ***we request a moratorium on artificial turf for all Los Gatos town-managed property or, at the very least, all of the following actions:***

- ***strict regulations that require [PFAS](#) free products (proven by 3rd party testing)***
- ***100% plant sourced infills***
- ***GMAX (field hardness) testing every six months (because of the heavy field use)***
- ***defined policies regarding field closures in response to unsafe field hardness (GMAX)***
- ***defined [policies](#) regarding field closures in response to elevated risk of heat related illness***

I understand that a primary concern for the town is cost. Beware of 20 year cost comparisons as these are often skewed in favor of artificial turf with misleading information as was the case when artificial turf was being considered by LGUSD (eg. omitting a full artificial turf replacement due at year 20). Also, consider the externalized costs ([Story of Stuff](#)). There are potentially irreparable environmental and human health costs, each of which could lead to exorbitant mitigation* and litigation costs especially with regard to PFAS and microplastics contamination of [local water supplies](#) for example. (All artificial turf carpet samples independently tested to date contained PFAS.) ***Note, any artificial turf being considered now will almost certainly exceed the PFAS limits of any future Bills.***

Creekside sports field is a prime example of how artificial turf is typically not maintained adequately. It's also a prime example of how owners typically haven't planned and budgeted to replace it in *advance* of it reaching irreparable field hardness. In 2022 this sports field exceeded recommended impact safety levels. Was this remediated? These fields also continue to disintegrate throughout their lifetime, polluting the environment (Los Gatos Creek) and putting the health and safety of children at risk. Even maintenance doesn't solve the migration of field debris beyond the sportsfield into the greater environment. ***Since the field is up for renewal in the next year or so, we strongly recommend investigating a return to natural turf for the field, because natural turf fields are possible.***

For ornamental purposes, be they town or residential, artificial turf also has negative environmental and human health costs and for that reason [Valley Water](#) does not give rebates for it as a solution to drought tolerant landscaping. For these ornamental spaces, and even dog parks, there are many healthier, safer and natural drought tolerant options.

Given that artificial turf is made with PFAS laden petrochemical plastic which then disintegrates into micro- and nano- plastics over its entire lifetime, the environmental, human health and financial costs will last for generations. The best way to avoid future potential mitigation* and litigation costs associated with artificial turf is to simply NOT install it in the first place. ***On this basis I urge the council to consider a moratorium on artificial turf or, at the very least, stringently regulate it as defined above. The [United States Environmental Protection Agency's PFAS Strategic Roadmap 2021-2024](#) requires local governments to prevent new PFAS contamination. Here is an opportunity for the Los Gatos Town Council to do just that.***

The following page lists just a few cost concerns with artificial turf sports fields, many of which also apply to town and residential artificial turf installations in general. Please don't hesitate to reach out to us for any questions, further information or discussion on this important matter. Thank you for your time!!

Kind regards,

Leanne McAuliffe, Concerned Resident of Los Gatos and Mom of Four.

FINANCIAL COSTS

- **Installation** - Artificial turf sports fields (AT) cost millions at first installation.
- **Maintenance** - If maintained correctly, the maintenance cost of AT would be similar to natural turf with a lawn mower simply being traded for multiple maintenance and grooming machines ([FieldTurf maintenance manual](#)). AT not maintained correctly opens up injury liabilities and voids warranty.
- **Replacements** - Carpet and infill replacement costs after 8 to 10 years are often higher than initial installation and can leave buyers surprised and without enough funds to replace worn out, unsafe fields. Replacements with shockpad at around the 20 year mark are even more expensive.
- **Converting back** - If it all goes wrong ([PFAS deception](#)), converting AT back to natural grass is said to be costly if soil replacement is required. This can make buyers feel locked into AT.
- **Mitigation* and Litigation** - AT environmental pollution and human health effects (heat related injuries, concussions, CTE, death, PFAS exposure, cancers etc.) may lead to [mitigation](#) and [litigation](#) costs.

HUMAN HEALTH COSTS (especially to our [kids who are uniquely vulnerable](#))

- **PFAS, Toxins, Microplastics** - AT potentially exposes our children to toxins (PFAS, microplastics, phthalates, heavy metals, methane, ethylene, etc.) through dermal contact, inhalation and ingestion, jeopardizing their short and long term health and safety. Chemical exposures have been listed as a potential cause of the [62% decline in sperm count](#) and [50% increase in cancer rates in children](#).
- **Heat** - AT can have a "[heat island](#)" effect leading to heat exhaustion, heatstroke (potentially fatal) and thermal burns. Many argue that excessive rain is an issue with natural turf. Excessive heat is the same for AT which can easily reach 40-70° hotter than local air temp with cork infill. In our town, heat is far more of an issue than rain, and properly managed natural turf fields can and do easily handle rain.
- **Injuries** - AT is associated with a [higher rate of injuries](#), concussions, friction burns etc.
- **Unregulated** - AT is [unregulated](#) at this time meaning no government organization currently categorically deems AT safe for children to play on.

ENVIRONMENTAL COSTS

- **Pollution** - AT pollutes the soil, [water](#) and air with PFAS, other chemicals, gasses and microplastics at site of manufacture, use and disposal. As AT disintegrates due to age, use, maintenance, UV and heat exposure, the level of pollution potentially increases.
- **End of Life Disposal** - AT is [NOT recycled](#). ("Chemical recycling" is [incineration](#).) A small amount is repurposed but the vast majority ends up in landfills and some is even illegally disposed of.
- **Biodiversity/Soil/Trees** - AT [destroys soil health](#) and biodiversity and can lead to the demise of surrounding shallow, wide rooting trees like redwoods.
- **Pesticides** - AT requires [pesticides](#) and herbicides as well as fungicides, biocides, anti-statics, cleaning agents. Some AT component products even include antibacterials as ingredients. Every AT "feature" equals more chemicals. And AT itself is chemicals. Compare this to organically managed grass.
- **Water** - AT advocates argue it uses less water which is crucial in times of drought. However, to provide a cool, safe, playable surface, irrigation amounts for AT are [greater](#) than for natural warm-season turf. Water is also required to clean AT and for maintenance purposes to meet warranty conditions. New [drought tolerant grasses](#) use dramatically less water and continue to improve with research and development.

If realistic water and maintenance costs between properly maintained artificial turf and natural turf sports fields are similar, why would we give up ALL the benefits of natural turf for ALL the negative and potential [costs](#) of artificial turf?

**You can only mitigate PFAS, you can not remediate. There is NO 100% solution to PFAS pollution, because there are no viable remediation methods at present. PFAS are called "forever chemicals" for a reason. They are mostly Persistent, Bioaccumulative Toxins (PBTs). This means they are essentially impossible to completely remove from soil, water, air and human bodies. Combine this with emerging data on the negative health and environment effects of PFAS, and the fact that thousands of PFAS have yet to even be studied, and it becomes clear that it's IMPERATIVE to STOP using PFAS wherever possible to prevent further and new contamination.*