

Bradford, Delana

From: Cynthia Fan
Sent: Wednesday, May 17, 2023 3:56 PM
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Subject: Public Comment for May 17, 2023 Parks Commission meeting regarding Lucchesi Turf Replacement

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We all want the **same** thing: accessible playing fields that keep children and our environment safe and healthy, both now and long-term.

Given all the downsides and risks that accompany artificial turf, we need to thoroughly explore the feasibility of high-use, natural grass fields affordably being kept in safe condition under the management of a Certified Sports Field Manager (CSFM).

Those advocating for artificial turf are likely primarily doing so because they are understandably skeptical that natural grass fields can sustain high use while affordably being kept in safe condition. However, **if** confidence could be established that natural grass fields can sustain high use while affordably being kept in safe condition under CSFM management and **if** the City articulated a plan to put the field under CSFM management, natural grass would likely be the clear preference of most everyone.

While commission members, council members, City staff, landscape architects, construction managers, engineering firms, groundskeepers, and the public can all cite examples of poorly-managed natural grass fields and offer opinions on whether natural grass fields could theoretically sustain high use while affordably being kept in safe condition, none of those listed are, on their own, experts in determining what is truly feasible when it comes to modern sports field management of modern natural grass cultivars. For that, the input of a CSFM is needed. A professional with this credential has the unique qualification of being able to assess the feasibility, at this site, of a high-use, natural grass field affordably being kept in safe condition under CSFM-management.

Lack of CSFM-managed, high-use, natural grass playing fields in our climate does not necessarily mean such fields are infeasible or unaffordable. Also, note that CSFMs are not just employed to manage fields for professional sports; Municipalities and school districts around the country put fields under the care of a CSFM.

If a CSFM-managed, high-use, natural grass field is a feasible and affordable option, then this option needs fair consideration.

Accordingly, my ask is that you have City staff, in direct consultation with a CSFM and other appropriate professionals:

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3. explore the feasibility of having a CSFM-managed natural grass
4. field (with a modern drought-tolerant cultivar) successfully maintained (using modern best management practices) in safe condition while supporting the field's high usage and
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8. compare the 30-year cost to own and operate such a field against

9. an artificial turf system maintained in safe condition (including the cost of replacement shockpad, the cost of requisite watering to periodically keep the system hygienic, and the cost of requisite water to cool the system for users as it, with increasing
10. frequency, reaches dangerous temperatures).
- 11.

Not only has the City neglected, to my knowledge, to ever consult directly with a CSFM, much has changed in the years since the City last formally compared natural grass and artificial turf. During this period of time:

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- Turf cultivars and sports field management have both evolved.
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- More evidence has accumulated regarding the risks, on artificial
- turf, of lower extremity injuries, traumatic brain injuries, heat-related illnesses, and exposures to the chemicals in an artificial turf system.
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- We've learned that alternative infills do not adequately mitigate
- artificial turf's heat.
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- The climate crisis, plastics crisis, and PFAS crisis have all continued
- to escalate, and more evidence of artificial turf's contributions has accumulated. For example, the fact that artificial turf sheds PFAS was only discovered in 2019.
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Given all the above, the option of CSFM-managed natural grass warrants proper evaluation by the City.

Nobody wants more PFAS in children or the watershed. PFAS are toxic in exceedingly small amounts and they accumulate in both humans and in the environment. Diagnoses of health consequences may be many years after PFAS exposure, similar to asbestos exposure. So if you ultimately approve of artificial turf, please insist the City require, in the purchase contracts, PFAS-free materials backed by independent third-party testing that includes UV exposure and leaching tests of the turf system. Beware that while a manufacturer may volunteer that a given system component has passed an Environmental Protection Agency PFAS test, some manufacturers are referring to a targeted test, and misleadingly neglecting to explain that such tests only check for a small fraction of the thousands of PFAS chemicals. Manufacturers also neglect to mention when they haven't tested *all* of the artificial turf system's components. Such claims are therefore not an adequate reassurance you are getting a PFAS-free artificial turf system. Prop 65 compliance is also not reassurance you are getting a PFAS-free artificial turf system. If a manufacturer is selling you a PFAS-free artificial turf system, they should be willing to have that validated with comprehensive tests and proof should be a welcome condition of the purchase contract. If they're not selling you a PFAS-free system, find a manufacturer that will. If you're buying a system that is not PFAS-free, parents deserve to be notified before they register their children for activities on the system.

Thank you for the consideration,
Cynthia Fan