



City of New York Parks & Recreation



**New York City Council
Committee on Parks & Recreation**

**Introduction 739 of 2008
(Prohibiting the use of certain synthetic turf on surfaces used for recreational purposes)**

**Introduction 896 of 2008
(Requiring signage warning of heat dangers of playground mats)**

**Introduction 918 of 2009
(Surface Areas of Playgrounds and Playing Fields)**

February 9, 2009

**Testimony by
Liam Kavanagh
First Deputy Commissioner**

INTRODUCTION

As you know, it is the Parks Department's mission to provide clean and healthy spaces for New Yorkers to get exercise and enjoy the outdoors. Across the city, Parks are havens for New Yorkers to use playgrounds, go for a swim, walk a dog, or play their favorite sports. To achieve our mission, we have to look for safe and creative ways to build, operate and maintain the myriad of facilities and resources the public demands. To that end, I am happy to be here today to speak about Introductions 739, 896, and 918. I also want to thank Nancy Clark from the Department of Health for her introduction. The Parks Department works closely with the Health Department on a variety of public health issues impacting parks and most recently on studying the safety of synthetic turf fields.

USE OF SYNTHETIC TURF AND SAFETY SURFACE – INTRO 739

Synthetic turf has become a widely used alternative for cities, sports teams, and universities across the country. While we consider New York City to be at the forefront of the urban open space management, we are not alone in using synthetic turf as a tool to increase fitness opportunities for park users of all ages. There are at least 6,000 of synthetic fields in the world and 3,000 fields in North America. In 2008, 700 fields were installed worldwide. In New York State, there are over 200 fields. Locally, these types of fields can be found at Giants Stadium, Rutgers University, Columbia University and Fordham University and at a number of other colleges and universities in the metro area, along with public, private, and parochial schools in the region. They are used by 21 NFL teams, 74 NCAA Division I teams, many more Division II and Division III teams, 3 Major League Baseball teams and 3 Major League Soccer teams.

BENEFITS OF SYNTHETIC TURF

Obviously, from the breadth and scope of installation in 2008 alone, many have found synthetic turf to be a tremendous benefit, opening up and expanding recreational opportunities and access for our youth and athletic-minded park users. These fields provide New Yorkers of all ages with greater access to places where they can exercise, which helps them fight obesity. Additionally, improved safety, increased versatility, higher durability to support more field use, and carbon footprint with no required weekly mowing, watering, fertilizing, seeding, or other time-intensive maintenance tasks, make synthetic turf fields an asset to our users and staff. Additionally, they are usable year-round, can be played on after heavy rain, and wear out much more slowly. A synthetic turf field is expected to last 8 to 10 years, whereas a heavily used natural grass field wears down quicker without adequate rest, reseeding, and extensive care.

These new fields have a transformative effect on our field system. They fill a critical shortage of available ballfield space in New York City. With a population growing both in size and diversity, New Yorkers need more field space, because more sports are being played than ever before. While many New Yorkers still play baseball and football, soccer has become extremely popular, and cricket, rugby, ultimate Frisbee, and lacrosse are also growing in popularity. These sports also tend to be high impact games and create a great deal of wear-and-tear on field surfaces.

To fill those critical shortages, we have been able to provide more fields by converting asphalt yards to synthetic turf fields. Conversions of asphalt yards to synthetic turf have led to the single biggest increase in usable field time. We have been able to increase access to fields in neighborhoods like East and Central Harlem that did not have many available fields. Young people and adults can now play their favorite sports right in their neighborhood. And thanks to the Mayor's PlaNYC, we will be converting 25 more asphalt lots to new fields.

SAFETY AND TESTING OF SYNTHETIC FIELDS

Parks takes great efforts to ensure we are installing the safest materials at all of our Parks sites throughout the city. Synthetic turf has existed in some form or fashion since the 1950s and has evolved into the current sophisticated technology we use today. These new fields are designed to protect against all sorts of sports-related injuries. Very often, when we've chosen a certain type of field to install at a particular site based on the specifications and needs of that field, we know that new emerging technologies are always coming to market that will provide safer, more cost-effective protection to our park users in the future.

In December 2007, at an oversight hearing of this committee, Commissioner Benepe discussed the safety benefits of synthetic turf fields. He discussed how synthetic turf fields are tested by an independent party to ensure compliance with Consumer Product Safety Commission standards, which address serious potential head and fall injuries. However, knowing that our fields protect against head trauma is not enough. We need to know that our fields are non-toxic and provide a safe and chemical-free playing environment. That is why Parks has continued to work closely with the Department of Health and Mental Hygiene on a number of projects involving synthetic turf fields. Last April, DOHMH issued a comprehensive literature review of existing scientific research into the health impacts of synthetic turf fields. Funded by a grant from the New York

Community Trust, the report found that exposure to crumb rubber is unlikely to increase the risk for any adverse health impact.

Parks has adopted a number of recommendations from the review, including establishment of a new procurement protocol requiring testing of all synthetic turf materials prior to their installation in a park. The report noted that elevated heat levels associated with synthetic turf fields could increase the risk of heat-related illnesses among field users. Parks has since posted signs at all synthetic turf fields cautioning the public about heat-related illnesses, stopped use of black crumb rubber from recycled tires in new projects and is using a number of alternative infill materials that retain less heat than crumb rubber. We are exploring new technologies that are safe and better for the environment, including carpet style turf and alternative infill materials such as thermoplastic granules, a virgin rubber product known as EPDM, ground coconut or walnut shells and sand coated with acrylic or food grade elastomer. We've also started to install water "mistlers" near the benches of fields that might get particularly hot in an effort to allow players to cool down more easily and continue to look for ways to reduce the summertime temperatures on synthetic turf fields.

The DOHMH report also found that there was little research into air concentrations of chemicals of potential concern above outdoor synthetic turf fields. DOHMH agreed to conduct those tests at two Parks Department fields: Thomas Jefferson Park in Manhattan and Mullaly Park in the Bronx.

While establishing background levels for chemicals of potential concern at both fields, a sample of crumb rubber from Thomas Jefferson Park was found to exceed the EPA standard for lead in outdoor playgrounds. None of the other chemicals of potential concern were found to exceed EPA standards. There is no EPA standard for lead levels in crumb rubber, but using the EPA standard for bare soil is appropriate and protective for assessing lead in crumb rubber. To test these fields, Parks and DOHMH adopted the standard for playground soil as the closest equivalent. At the request of DOHMH, Parks conducted a series of tests which confirmed the elevated lead levels found by DOHMH. The average lead content for the thirty-one samples taken was 502 parts per million (ppm), with 15 samples falling below the 400 ppm standard and 16 coming in above that level. The field was closed due to the elevated lead levels and will be replaced this winter. We expect to have the field open for play by the end of April.

Using protocols developed by DOHMH, Parks is currently testing of all synthetic turf fields for lead content. To date, we are pleased to report that all fields with crumb rubber infill have tested negative (with the exception of Thomas Jefferson) for elevated lead levels. We are continuing to test all "carpet style" fields and turf and carpet play areas, and will share those results when we expect to complete the testing by the end of February, weather-permitting.

CONCLUSION – INTRO 739

Intro 739 bans the use of crumb rubber infill material, calls for a moratorium on new synthetic turf installations and replacement of existing synthetic turf fields over a 12-month period. However, given the benefits of synthetic turf and absent substantial data supporting a legitimate health or safety issue, a replacement program as currently outlined in Intro 739 is not in the city's best interest. The total ban on crumb rubber infill material appears to be overly broad. The

DOHMH literature review mentioned earlier did not find evidence of an elevated human health risk due to chemicals contained in crumb rubber infill. A moratorium on new synthetic turf installations will only delay needed renovations, leaving the public with fewer opportunities to use safe, high quality playing fields. Similarly, replacing all existing synthetic turf fields over a 12-month period would disrupt the schedules of hundreds of youth and adult leagues.

SIGNAGE IN PLAYGROUNDS – INTRO 896

Safety is and will remain the Parks Department's highest priority at our playgrounds. Thankfully, New York City's playgrounds are the best and safest in the country, due to protective safety surfacing that meets all industry and regulatory codes. Complementing the quality of our equipment, we have an extensive signage system that promotes safety. Throughout the city, over 2,000 signs are posted at playgrounds reminding park patrons to wear shoes and appropriate clothing, especially when it gets hot. And, we will continue to ensure that signs are posted at every playground and in different languages where appropriate.

As we mentioned, ensuring the safety of users is a primary concern when designing parks and playgrounds. The rubber safety mats that are used in playgrounds are considered state-of-the-art and have prevented many serious injuries. We inspect all play equipment regularly using the most comprehensive playground and park inspection system in the country, and we have been nationally recognized for safety. All play equipment complies with the rigorous standards established by the American Society for Testing and Materials and the U.S. Consumer Product Safety Commission.

Now, we recognize that when temperatures rise, all outdoor surfaces get hot. Where possible, we are proactively building roofs over play equipment and planting trees to help provide shade. Some have questioned if different colors other than black were used on our safety surface if there would be a significant reduction in temperature. We are not aware of evidence of significant benefits coming from a change of color, but continue to track new technologies to be implemented should we see benefits to health and safety for our users.

We appreciate the thoughtfulness put into the crafting of Introduction 896. While we think our work in this area renders the bill duplicative, we hope we can continue to work with you on these issues and address concerns you may have.

AGENCY COLLABORATION ON PLAY AREA SURFACES – INTRO 918

Lastly, I'd like to thank my colleagues from the Department of Health and Mental Hygiene for addressing Introduction 918. We support their analysis and articulation of their position, and look forward to a continued great working relationship on these and many other important issues.

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FOR THE RECORD

February 9, 2009

**Statement of American Youth Soccer Organization Region 473 (Brooklyn) to
New York City Council Committee on Parks and Recreation Regarding Turf Ball Fields**

To the Committee:

I am the Safety Director and Camp Director of AYSO Region 473, a national volunteer-run youth soccer program. We use the ball fields at the Parade Grounds. In addition, I am the Risk Manager for the Cosmopolitan Junior Soccer League, offering youth soccer programs for 75 years – before the formation of USSF.

The introduction of turf fields has transformed youth soccer and the way ball fields are used. Communities are using the ball fields for longer periods of time, promoting more healthy lifestyles and in the case of athletics sportsmanship. Our competitive programs consistently deliver soccer players to the youth national programs, keeping NYC players at the forefront of soccer and open college opportunities not otherwise available to these players.

In June of 2008, the CDC and National Council for Environmental Health issued a notice of concern specifically relating to field turf made with nylon or nylon/polyethylene composite fibers. In discussions with the Parks department and their landscape architect Christian Zimmerman, we confirmed that the material used at the Parade Grounds for our synthetic fields – polyethylene - are not the type indicated by CDC to have potential lead problems. In a review of CDC notices and announcements this material is not included in the CDC warning.

Further, and with respect to concerns regarding heat, we have not experienced the very high temperatures reported in the tabloids. Surface and reflective temperatures are significantly lower than those at the beaches. Because this turf does not absorb and then reflect heat the way the nylon and composites do, there is little of the degradation that would cause nylon (or nylon blend) to release dust containing levels of lead that would pose a public health concern. The CDC notice of 6/18/08 states "Tests of artificial turf fields made with only polyethylene fibers showed these fields contained very low levels of lead and do not pose a public health concern."

This said, every responsible program must have a heat protocol rigorously applied, including scheduled (and "free") water breaks and shade breaks every 15-20 minutes, the use of water sprayers, both for the players and on the fields and constant supervision to ensure the safety of the players. Most organized athletic programs have a heightened awareness of heat management protocols, and we believe that it is the unsupervised child, and not those participating in supervised activities that may be at risk.

Well before the issue of heat became a public concern, in fact when the fields were put into service, the ball field managers from the Parks Department and Prospect Park Alliance made hoses and water reel sprayers available.

As you advance your findings of fact and deliberate on how our ball fields will be safely used, I sincerely hope that both the CDC findings and reliance on the good judgment of the supervisors of the many youth programs using the ball fields will ensure the continued use of the existing ball fields.

Thank you for your consideration.

FOR THE RECORD

My name is Ken Baer. I reside at 91 6th Avenue in Brooklyn and I am a candidate for City Council in the 33rd C.D.

I oppose the installation of artificial turf in both public and private parks and playing fields.

Artificial turf contains a host of heavy metals, including lead, arsenic and cadmium. These are carcinogens that people, and especially children, should not be exposed to. Fields that use crumb-rubber infill have tested positive for high levels of lead. The soil around artificial turf in Riverside Park has tested positive for polycyclic aromatic hydrocarbons (PAHs) that exceed the safety levels established by the NY State Department of Environmental Conservation. Benzo(a)pyren was also detected there at more than 8 times the acceptable level.

New York City has passed a lead paint law to protect children from this heavy metal. New York City should be thorough in its protection of children from dangerous substances, and eliminate all artificial turf fields. The city should be installing natural grass which emits oxygen into the air, fixes carbon dioxide and filters out harmful particulate matter.

Another argument against the use of artificial turf is the excessive and dangerous heat it produces. A report by Patrick Arden documented that the temperature on an artificial turf field in Cadman Plaza in Brooklyn was 165 degrees in June, 2008. Skin can be easily burned at this level. Risks also exist for dehydration and heat exhaustion at this temperature.

Professional sports teams have also found reason to replace artificial turf with natural turf in their stadiums. It was found that there were significantly more injuries on artificial turf than there were on grass. Pro teams invest millions of dollars in their players and want to protect their investments. We should be similarly protective of our children.

Grass fields do not have to wear out from excessive use. After a field gets roughed up a bit from use or is excessively wet, it should be cordoned off until it recovers. Rotating portions of fields makes better sense than exposing humans to carcinogens.

Thank you.



New York City Council Parks and Recreation Committee

Int. 739, 896 and 918 and Res 1782: Artificial turf and Playground safety surfacing

New Yorkers for Parks Testimony
February 9, 2009

Good morning. My name is Sheelah Feinberg and I am the Director of Government and External Relations at New Yorkers for Parks (NY4P), the only independent watchdog for all the city's parks, beaches, and playgrounds. We would like to thank the Parks Committee for holding this very important hearing.

Background

For more than three years, New Yorkers for Parks has been closely researching and following the synthetic turf issue, beginning with our 2006 position paper, "A New Turf War." For the past year, New Yorkers for Parks and a coalition of environmental and health groups have been working with the City Parks Department, Health Department, and Office of Long-term Planning and Sustainability to address the research needs and findings around artificial turf.

The NYC Parks Department has now installed more than 100 artificial turf surfaces throughout the city or the equivalent of 365 acres. We understand that there is great demand for playing time by many sports leagues on the City's fields both natural and artificial. As the Council is aware, in December the Parks Department was forced to close down the soccer field at Thomas Jefferson Park due to high levels of lead. In response to that situation, The Parks Department now requires manufacturers to test their fields for lead and chromium prior to purchasing and installing new fields, which is a great first step. Still, we feel that many other issues including stormwater and the urban heat island effect must be studied, and that testing must continue on an ongoing basis throughout the lives of these fields to ensure that they

remain safe. Simply put we worry about the longevity of these fields and want to be sure they are safe to use in year one AND year three.

Though the NYC Parks Dept. is the largest purchaser of synthetic turf, this surfacing is also used at Department of Education and New York City Housing Authority (NYCHA) sites. Therefore, a citywide policy is needed to guide the testing, installation, and removal of turf surfacing to ensure that all agencies are adhering to a protocol.

A Citywide Policy for Turf

New Yorkers for Parks would like to work with the City Council to create a policy, which should: 1) require testing of all new types of turf to measure specific health and environmental impacts such as heat, stormwater, etc., and would serve as a general environmental impact review (GEIS) for new fields 2) require annual testing and maintenance inspections throughout the life of the field, 3) outline specific removal methods for the field, again according to a GEIS and 4) ensure community feedback in field surface decisions. Such a policy would go a long way in reassuring concerned parents and community members, and could serve as a model for policies across the country.

Safety Surfacing

New Yorkers for Parks board member Ann Bittenweiser advocated for the introduction of safety surfacing in New York City's parks in the 1960s due to the serious injuries sustained by children who fell from play equipment onto asphalt. The need for such surfacing remains today. Clearly the black color of the safety surfacing retains more heat, and indeed is a threat to bare feet; but the safety surfacing has prevented countless injuries. We are pleased that the Parks Department posts heat warnings at all playgrounds and purchase lighter colored safety surfacing. But these postings should be in several languages and there should be more maintenance dedicated to worn down safety surfacing.

The lead found on Thomas Jefferson Park's field and the heat problems that have been associated with safety surfacing further prove the need for a citywide policy that requires testing of materials before they are installed in parks.

Legislation

Regarding today's proposed legislation, we offer the following comments.

Int 739 - Prohibiting the use of certain synthetic turf on surfaces used for recreational purposes

- We do not support this legislation because we do not believe there is a need at this time for a moratorium.
- Rather than institute a citywide moratorium on one type of turf, the best approach is to create a citywide policy so that all future types of turf will be subject to the same health and safety requirements.

Int 896 - Requiring signage warning of heat dangers of playground mats.

- We agree the signage is necessary in different languages to warn parents of the potential extreme temperatures that can be reached on playground safety surfacing and urge the Council to fast track its passage.

Int 918 - Surface areas of playgrounds and playing fields

- We agree that all surfaces should be subject to health and safety tests; however, rather than offering piecemeal legislation, we feel that an entire policy should be adopted that outlines the requirements for the lifetime of such surfaces.

Res 1782 - Playground equipment and the Department of Parks and Recreation to require a temperature test for all equipment installed in parks and playgrounds.

- We agree the temperature testing should be mandated; however, we feel, again, that this should be written into a larger citywide policy governing the use of artificial surfaces in City parks.

In summary, the City needs to create sound policy, conduct test, and conduct environmental reviews to ensure the safety of our children and of our environment.

Thank you.



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February 6, 2009

The Honorable Christine C. Quinn
Council Speaker
City Hall
New York, NY 10007

Dear Speaker Quinn,

The Board of the New York Chapter of the American Society of Landscape Architects urges the City Council to support a balanced view toward the use of Field Turf in public spaces throughout the five boroughs. Use of field turf in the proper ecological and social context of the city provides great public benefit.

The American Society of Landscape Architects, founded in 1899, is a national association representing the interests of over fourteen thousand landscape architects across the country. As part of the larger organization the NYASLA, advocates for the concerns of landscape architects and allied professionals from the downstate, Long Island and New York City region. Important to our mission is responsible decision making regarding public health and safety. We would not advocate for the use of field turf if we felt that it posed a great danger to the public.

The issue is complex and has many nuances. Arguments can be made on both sides suggesting enhanced environmental performance but given the extreme conditions that often exist in areas where turf is proposed, we feel that its use should be continued.

This statement is not to say that every lawn or landscape should be recreated in plastic and rubber but rather that turf is among the many elements that should be made available to park designers to help manage maintenance in heavily impacted outdoor spaces replacing asphalt and other hard or compacted surfaces.

We have enclosed for your reference two charts that list specific data relating to the issue to help clarify many of the realities as well as urban myths. Thank you for your consideration.

Sincerely,

Susannah C. Drake RLA, ASLA
President
New York Chapter

CC Helen Foster, Chair Parks & Recreation Committee

ARTIFICIAL TURF - ENVIRONMENTAL CONCERNS : PRO

| DATA | SOURCE |
|------|--------|
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Artificial turf recycles 1/12 of the 300 million auto tires that are withdrawn from use each year; the average soccer field can contain crumb rubber made from 27,000 tires at a density of about 4 to 15 lbs of infill per square foot. (Counterpoint: About 80% of the scrapped tires currently go to end-use markets instead of going to a landfill. In 2003, 44% of scrap tires were used as tire-derived fuel. Other uses were in road construction and playground and sports surfacing. Source USDE- Energy Efficiency and Renewable Energy.)

Industry expansion [of artificial turf] allows us to make a positive impact on the environment by conserving water, lowering the usage of pesticides and fertilizers and recycling materials.

Each FieldTurf field saves over one million gallons of fresh water every year. It needs no herbicides, fungicides or pesticides - eliminating some of the eight billion pounds of these harmful chemicals used each year in natural grass fields.

Maintaining a FieldTurf field produces no pollutants from lawn mowers or other equipment normally used to look after playing fields.

The frequent mowing required for natural grass lawns and fields also results in emissions of hydrocarbons and carbon monoxide (up to 5% of such emissions in the United States, according to the Environmental Protection Agency)

Discarded artificial turf materials can be cleaned and reused, put to another purpose, such as rubber asphalt, incinerated, or used in place of soil to separate landfill layers.

Rick Doyle, president of the Synthetic Turf Council, as stated in Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".

25 January 2009 "Study seeks answer: Are artificial turf fields safe?" Bridgeport Connecticut Post, Connecticut.

Environmental Intelligence - The Truth about Synthetic Turf By Jason Smollett, FieldTurf representative

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Texas A&M University Cooperative Extension, "Water Management on Turfgrass," stated in Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".

Rick Doyle, president of the Synthetic Turf Council, as stated in Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".

ARTIFICIAL TURF - ENVIRONMENTAL CONCERNS : CON

| DATA | SOURCE |
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Artificial Turf has a 10-12 year lifespan, and then is typically placed in a landfill.

*Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".
EHHI study, as stated in Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".*

25 different chemical species and 4 metals (zinc, selenium, lead and cadmium) could be released into water from rubber infill. Because synthetic turf is unable to absorb or filter rain water, chemicals filter directly into storm drains and into the municipal sewer system without the beneficial filtration that live vegetation provides.

Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".

Although one environmental argument is that artificial turf needs no irrigation, however, in hot temperatures water misters are needed to cool the surface of the playing field and additional some college teams saturate the synthetic fields before each practice and game to increase traction.

Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".

Many physical properties of synthetic turf-- including its dark pigments, low density mass and lack of ability to vaporize water and cool the surrounding air-- make it particularly efficient at increasing its temperature when exposed to the sun. This is not only a hazard for users, but also can contribute to the heat island effect in which cities become hotter than surrounding areas because of heat absorbed by dark man-made surfaces such as roofs and asphalt.

*Turfgrass Producers International, as stated in Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".
10 September 2008, Sigrun N. Gadwa, MS, PWS, Ecologist, Registered Soil Scientist, Cheshire, CT.*

Natural grass increases pollution control, absorption of carbon dioxide, a cooling effect, water infiltration, and prevention of soil erosion.

Fields with soil and live grass generate oxygen, sequester carbon dioxide, and provide natural cooling through transpiration.

10 September 2008, Sigrun N. Gadwa, MS, PWS, Ecologist, Registered Soil Scientist, Cheshire, CT.

It is not generally realized how much nitrogen is in atmospheric fallout; N concentration in roof runoff is typically 2.0 mg/l or more (NYDEC). Nitrogen is a water pollutant, and an artificial turf field is effectively an impervious surface, shedding its nitrogen in field drainage, and impacting downgradient waterways. Natural grass fields, that are organically maintained, without soluble fertilizers and pesticides, do not cause algal blooms and scum in downgradient streams and ponds.

10 September 2008, Sigrun N. Gadwa, MS, PWS, Ecologist, Registered Soil Scientist, Cheshire, CT.

Zinc is leached from vulcanized tire rubber crumb materials, and reaches high enough concentrations in field drainage water to harm downgradient aquatic life (though not people), substantially exceeding the Connecticut toxicity criteria (0.065 mg/l). Over time zinc accumulates in sediments and becomes increasingly hazardous to sediment-dwelling organisms. It moves up the food chain when invertebrates are eaten by larger creatures like birds, fish, and turtles.

Marcha Johnson, NYC Dep't. of Parks and Recreation, 2005

"Fieldturf" has been shown to raise the ground temperature by 10-15 degrees through retaining sunlight, adding to the urban heat island effect caused by asphalt, concrete and other urban surfaces.

Marcha Johnson, NYC Dep't. of Parks and Recreation, 2005

To function correctly, plastic turf fields have to be dead level. Converting natural landscapes to such fields can disrupt natural drainage patterns, and when there are large numbers of fields together, it creates the need for artificial drainage systems. The most recent artificial turfs do a much better job of infiltrating water into the ground, but they still contribute to the flashy urban runoff which floods the subways, erodes topsoil in vulnerable areas and overwhelms the city storm sewers. When storm water soaks into the soil beneath vegetated areas, it is filtered and cleansed by helpful bacteria and fungi; this is not the case beneath artificial turfs which contribute no organic matter to the soil and starve the complex of microorganisms which purify water on its way to the harbor.

Marcha Johnson, NYC Dep't. of Parks and Recreation, 2005

The combination of living soil organisms including microbes, and the porous nature of soil has many benefits which are lost when planted landscape is converted to plastic. Green living lawns produce oxygen; grass and soil together provide food and habitat; dozens of species benefit from the presence of lawns in NY: dogs, bees, butterflies, robins, dragonflies...none of them benefit from plastic grass.

ARTIFICIAL TURF - HEALTH & SAFETY CONCERNS : PRO

| DATA | SOURCE |
|---|---|
| <p>The concern about lead is focused mostly on older, nylon fields built by AstroTurf's former U.S. owner, Southwest Recreational Industries, which went out of business in 2004.</p> | <p>McCarthy, M and S Berkowitz. 2008. <i>Artificial turf: health hazard?</i> USA Today May 7.</p> |
| <p>There have been no known reported cases of illness attributed to the fields.</p> | <p>McCarthy, M and S Berkowitz. 2008. <i>Artificial turf: health hazard?</i> USA Today May 7.</p> |
| <p>The U.S. Consumer Product Safety Commission found that young children are not at risk from exposure to lead from playing on these fields.</p> | <p>25 January 2009 "Study seeks answer: Are artificial turf fields safe?" Bridgeport Connecticut Post, Connecticut.</p> |
| <p>New Jersey public health officials had determined that the lead levels from older, worn synthetic fields could exceed acceptable levels, but that the problem was not an issue with newer surfaces.</p> | <p>25 January 2009 "Study seeks answer: Are artificial turf fields safe?" Bridgeport Connecticut Post, Connecticut.</p> |
| <p>The material, made from ground-up tires, has been used for almost 50 years as a surface for running tracks and under playground equipment.</p> | <p>25 January 2009 "Study seeks answer: Are artificial turf fields safe?" Bridgeport Connecticut Post, Connecticut.</p> |
| <p>Synthetic turf is an off-shoot of the carpet industry, and carpeting often contains low levels of lead that cause no public health threat. So do other plastics, such as twisting telephone cords. Any lead found in artificial turf grass is inert and encapsulated in plastic</p> | <p>John Amato, a member of the Synthetic Turf Council, an industry group in Westford, PA, found in: 19 January 2009 "In fake grass, some see real threat." Boston Globe, Massachusetts.</p> |
| <p>Lead in artificial turf can be avoided without any extra cost, industry specialists said. FieldTurf, the largest artificial turf manufacturer in North America, sells lead-free artificial turf.</p> | <p>19 January 2009 "In fake grass, some see real threat." Boston Globe, Massachusetts.</p> |
| <p>"Testing on FieldTurf fields have consistently shown 10-20 ppms or less than 5% of the lead level regarded as problematic. No cases of elevated blood lead levels in children have been linked to artificial turf on athletic fields in New Jersey and elsewhere."</p> | <p>The Center for Disease Control (CDC), July 2008</p> |
| <p>"Lead chromate levels are well below that necessary to cause harm to children and athletes using the popular playing field surfaces. No acute health risks due to use of artificial turf fields, and risks due to chronic and repeated exposure are unlikely."</p> | <p>New Jersey Department of Health and Senior Services (NJDHSS), July 2008</p> |
| <p>"Using the EPA wipe test used to evaluate hospitals and school surfaces, a child would have to wipe his fingers on the turf and put them in his mouth 750 times in a day to receive enough lead to equal the CPSC threshold level."</p> | <p>Dr. Davis Lee, Ph.D. - Synthetic Organic Chemistry, Executive in Residence at the Georgia, Institute of Technology School of Polymer, Textile, and Fiber Engineering, July 2008</p> |
| <p>"Using the most extreme scenario it is virtually impossible for a child to be at risk from synthetic turf: a 50 lb. child would have to ingest over 100 lbs. of synthetic turf in one 24 hour period."</p> | <p>Dr. David Black, Ph. D. - Diplomate of the American Board of Forensic Toxicology (D-ABFT), of the American Board of Clinical Chemistry (D-ABCC) and a Fellow of the American Institute of Chemists (FAIC). July 2008</p> |
| <p>"The lead levels that were discovered are isolated to the core samples of the turf, and did not appear in the samples of dust, wipes and blades of artificial grass taken from the field - in other words, the lead is encapsulated in the fibers inside the turf and not leaching out to the surface to be ingested".</p> | <p>Patrick Guilmette - PMT Group; premier environmental and consulting engineering firm in NY, NJ, CT, PA, July 2008</p> |
| <p>Results concluded that the children had blood lead levels equal to or less than those tested in other areas of New Jersey who had not been exposed to other synthetic turf fields.</p> | <p>Eddy Bresnitz, - New Jersey Deputy Commissioner and State Epidemiologist, in studying the Ironbound fields and neighborhoods, July 2008</p> |

In urban areas like NYC, where the maintenance costs of natural grass lawn cannot be accommodated, an artificial turf lawn provides the only means of recreational space which promotes active, outdoor recreational activities to young people in neighborhoods where little of these opportunities exist. Exercise, outdoor air, and team-based sports are all positive healthy activities that need promotion in many urban NYC neighborhoods.

"There are millions of square feet of synthetic turf already installed on fields around the country, and not one environmental impact statement has been issued."

Environmental Health Perspectives, vol. 116, no. 3, March 2008, *Environews*
Focus: "Synthetic Turf, Health Debate Takes Root".

Geoffrey Croft, president of New York City Parks Advocates, a nonprofit promoting public funding and increased park services.

ARTIFICIAL TURF - HEALTH & SAFETY CONCERNS : CON

| DATA | SOURCE |
|------|--------|
|------|--------|

The state Department of Health issued a fact sheet in October 2007, finding no reason to stop installation of new crumb rubber fields. The fact sheet noted that volatile organic compounds including toluene are released from the rubber, and that inhalation and ingestion of these chemicals is possible. BUT DPH concluded that "based upon the current evidence, a public health risk appears unlikely."

25 January 2009 "Study seeks answer: Are artificial turf fields safe?" *Bridgeport Connecticut Post, Connecticut.*

The CDC issued guidelines that include not eating or drinking on the synthetic surfaces, and that users thoroughly wash their exposed skin and their clothes as soon possible after leaving the field.

25 January 2009 "Study seeks answer: Are artificial turf fields safe?" *Bridgeport Connecticut Post, Connecticut.*

The CDC has said that age, weathering, exposure to sunlight, and wear and tear can cause [lead] dust to form on older or well-used fields.

19 January 2009 "In fake grass, some see real threat." *Boston Globe, Massachusetts.*

The CDC issued an official health advisory in June saying the "potentially unhealthy levels of lead dust" found on the New Jersey fields raised concern and warranted additional testing. The Consumers Union has also advocated for additional testing of the fields.

19 January 2009 "In fake grass, some see real threat." *Boston Globe, Massachusetts.*

We collected seven samples of rubber granules and one sample of artificial grass fiber from synthetic turf fields at different ages of the fields. We analyzed these samples to determine the contents (maximum concentrations) of polycyclic aromatic hydrocarbons (PAHs) and several metals (Zn, Cr, As, Cd, and Pb). We also analyzed these samples to determine their bioaccessible fractions of PAHs and metals in synthetic digestive fluids including saliva, gastric fluid, and intestinal fluid through a laboratory simulation technique. Our findings include: (1) rubber granules often, especially when the synthetic turf fields were newer, contained PAHs at levels above health-based soil standards. The levels of PAHs generally appear to decline as the field ages. However, the decay trend may be complicated by adding new rubber granules to compensate for the loss of the material. (2) PAHs contained in rubber granules had zero or near-zero bioaccessibility in the synthetic digestive fluids. (3) The zinc contents were found to far exceed the soil limit. (4) Except one sample with a moderate lead content of 53 p.p.m., the other sample

Zhang J, I-K Han, L Zhang and W Crain. 2008. Hazardous chemicals in synthetic turf materials and their bioaccessibility in digestive fluids. *Journal of Exposure Science and Environmental Epidemiology* 18:600-607.

Relatively low concentrations of lead (3.12-5.76 p.p.m.), according to soil standards. However, 24.7-44.2% of the lead in the rubber granules was bioaccessible in the synthetic gastric fluid. (5) The artificial grass fiber sample showed a chromium content of 3.93 p.p.m., and 34.6% and 54.0% bioaccessibility of lead in the synthetic gastric and intestinal fluids, respectively.

Older fields, which are now being replaced with newer surfaces, need to be disposed of properly.

Zhang J, I-K Han, L Zhang and W Crain. 2008. Hazardous chemicals in synthetic turf materials and their bioaccessibility in digestive fluids. *Journal of Exposure Science and Environmental Epidemiology* 18:600-607.

Although many chemicals were found, the four compounds that were conclusively identified with confirmatory tests were benzothiazole; butylated hydroxyanisole; n-hexadecane; and 4-(t-octyl) phenol. Approximately two dozen other chemicals were indicated at lower levels. The four chemicals found have the following reported actions:

- Benzothiazole: Skin and eye irritation, harmful if swallowed. There is no available data on cancer, mutagenic toxicity, teratogenic toxicity, or developmental toxicity.
- Butylated hydroxyanisole: Recognized carcinogen, suspected endocrine toxicant, gastrointestinal toxicant, immunotoxicant (adverse effects on the immune system), neurotoxicant (adverse effects on the nervous system), skin and sense-organ toxicant. There is no available data on cancer, mutagenic toxicity, teratogenic toxicity, or developmental toxicity.
- n-hexadecane: severe irritant based on human and animal studies. There is no available data on cancer, mutagenic toxicity, teratogenic toxicity, or developmental toxicity.
- 4-(t-octyl) phenol: corrosive and destructive to mucous membranes. There is no available data on cancer, mutagenic toxicity, teratogenic toxicity, or developmental toxicity.

VOCS from rubber infill can be aerosolized into respirable form during sports play.

49 chemicals could be released from tire crumbs, and given a gastric simulation test of the rubber crumbs, OEHHA calculated a cancer risk of 1.2 in 10 million assuming a one-time ingestion over a lifetime.

A hand wipe experiment calculated an increase cancer risk of 2.9 in 1 million for ingestion of chrysene (a suspected human carcinogen found in rubber tires) via hand to mouth contact with crumb rubber infill.

infill containing a sand/rubber mixture in artificial turf has 50,000 times higher levels of bacteria than infill made of rubber alone.

Environment and Human Health Inc. (EHHI), a 10-member, nonprofit organization composed of physicians, public health professionals and policy experts dedicated to protecting human health from environmental harm through research, education and improving public policy, and the the Connecticut Agricultural Experiment Station data conducted in 2008, from: 24 January 2008, "Health Implications unclear with synthetic turf fields." by Nancy Alderman, Atlanticville News.

Norwegian Institute of Public Health, "Artificial Turf Pitches: An assessment of the Health Risks for Football Players." 2006, as stated in Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".

California Office of Environmental Health Hazard Assessment (OEHHA), "Evaluation of Health Effects of Recycled Waste Tires in Playground and Track Products." January 2007, as stated in: Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".

California Office of Environmental Health Hazard Assessment (OEHHA), "Evaluation of Health Effects of Recycled Waste Tires in Playground and Track Products." January 2007, as stated in: Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".

Sprinturf, synthetic turf manufacturer, as found in Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".

ARTIFICIAL TURF - COST & MAINTENANCE : PRO

| DATA | SOURCE |
|------|--------|
|------|--------|

The upfront costs to install a synthetic field run from \$400,000 to several million dollars. But the fields can last 10 years or more and withstand the kind of non-stop pounding that would turn a natural grass field into dirt.

McCarthy, M and S Berkowitz. 2008. Artificial turf: health hazard? USA Today May 7.

Densely populated urban areas have to use artificial fields, says Bob Hurley, director of parks and recreation for Jersey City... The fake grass allows local teams to "play twice as many" football, baseball and soccer games, says Hurley, a well-known high school boys basketball coach at St. Anthony. "If it rains, half an hour later everything has soaked through and we're able to play."

McCarthy, M and S Berkowitz. 2008. Artificial turf: health hazard? USA Today May 7.

The low maintenance, along with the fact that the artificial surfaces can withstand much heavier usage than traditional grass fields, balances the higher initial cost, officials said. A crumb rubber turf field can cost \$800,000 or more, compared to about \$250,000 for dirt and grass.

25 January 2009 "Study seeks answer: Are artificial turf fields safe? "Bridgeport Connecticut Post, Connecticut.

FieldTurf can survive over ten years of daily abuse from football, soccer, baseball, lacrosse, rugby, field hockey, gym class, band practice.

Environmental Intelligence - The Truth about Synthetic Turf By Jason Smollett, FieldTurf representative

Natural grass sports fields can require up to 1.5 million gallons of water per acre per year.

Texas A&M University Cooperative Extension, "Water Management on Turfgrass," stated in Environmental Health Perspectives, vol. 116, no. 3, March 2008, Envirenews Focus: "Synthetic Turf, Health Debate Takes Root".

Artificial turf can be installed relatively quickly and, once functional, can be used almost continuously. In contrast, grass field need time to take root and must be closed periodically for proper maintenance.

Environmental Health Perspectives, vol. 116, no. 3, March 2008, Envirenews Focus: "Synthetic Turf, Health Debate Takes Root".

Average synthetic turf soccer field costs \$1.4 million compared to \$690,000 of natural grass field, but when costs are prorated over the expected lifespan of the field, including maintenance, the difference in cost narrows to less than \$15,000 more for the natural grass.

"A New Turf War" as stated in Environmental Health Perspectives, vol. 116, no. 3, March 2008, Envirenews Focus: "Synthetic Turf, Health Debate Takes Root".

ARTIFICIAL TURF - COST & MAINTENANCE : CON

| DATA | SOURCE |
|------|--------|
|------|--------|

The \$15,000 cost savings for artificial turf vs. lawn over the lifespan of a field is "negligible considering the many unknowns about artificial turf."

Christian DiPalermo, executive director of New Yorkers for Parks, as stated in Environmental Health Perspectives, vol. 116, no. 3, March 2008, Envirenews Focus: "Synthetic Turf, Health Debate Takes Root".

Synthetic turf owners must disinfect their fields as often as twice a month, with more frequent cleanings for sideline areas, where contaminants concentrate.

American Sports Builders Association, "Synthetic Turf Sports Fields: A Construction and Maintenance Manual," 2006, stated in Environmental Health Perspectives, vol. 116, no. 3, March 2008, Envirenews Focus: "Synthetic Turf, Health Debate Takes Root".

These fields need regular vacuuming; when geese and dogs roam around, the resulting fecal matter is hard to clean.

Marcha Johnson, NYC Dep't. of Parks and Recreation, 2005

ARTIFICIAL TURF - AESTHETIC AND USE-BASED CONCERNS : PRO

| DATA | SOURCE |
|------|--------|
|------|--------|

"Many [NYC] districts have no green parks, not even one." Installing synthetic turf fields along with additional recreational facilities, lawns, and natural grass fields, provides a better means to "...confront this issue."

Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".

Synthetic turf can be open for use 28% more of the time in a year than natural grass fields because they can withstand heavy use.

New York City Dep't of Parks and Recreation, as stated in Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".

"Even the wealthiest professional sports teams and Ivy League universities have concluded that grass fields are a losing proposition for intense-use sports such as football or soccer... There is also the reality that natural turf fields used for high intensity sports must be replaced every few years, unless you severely restrict use."

Adrian Benepe, director of NYC Dep't of Park and Recreation, as stated in Rick Doyle, president of the Synthetic Turf Council, as stated in Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".

"More maintenance cannot overcome overusage of a natural grass sports field... And overusage of a natural grass sports field or usage during a rainstorm or in months of dormancy will produce an unsafe playing surface."

Rick Doyle, president of the Synthetic Turf Council, as stated in Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".

ARTIFICIAL TURF - AESTHETIC AND USE-BASED CONCERNS : CON

| DATA | SOURCE |
|------|--------|
|------|--------|

Many studies have shown a direct benefit to humans from seeing/ experiencing natural cycles such as the change of seasonal colors, flowering, fragrances (such as freshly mown lawn) and growth.

Marcha Johnson, NYC Dep't. of Parks and Recreation, 2005

A poll conducted by the National Football League Players Association in 1995 showed that more than 93% of players believed playing on artificial surfaces increased their chances of injury.

Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".

10% more injuries when games are played on synthetic turf than when played on grass surfaces.

The American Journal of Sports Medicine, 1 October 2004, as stated in: Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".

"Today's children largely grow up in synthetic, indoor environments... Now with the growing popularity of synthetic turf fields, their experience with nature will be less than ever."

Turfgrass Producers International, as stated in Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".

Direct temperature measurements conducted during site visits showed that synthetic turf fields can get up to 60 degrees hotter than grass, with surface temperatures reaching 160 degrees on summer days.

Environmental Health Perspectives, vol. 116, no. 3, March 2008, Environews Focus: "Synthetic Turf, Health Debate Takes Root".



**RIVERSIDE
PARK FUND**

Testimony to the New York City Council
The Use of Synthetic Turf in Recreational Facilities

Parks & Recreation Committee
February 9, 2009

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New York, NY 10115

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My name is Jim Dowell, and I am President of Riverside Park Fund, the non-profit conservancy organization for Riverside Park, stretching along the Hudson River in Manhattan from 59th to 158th Street. While we work closely with the Parks Department, we are an independent membership organization of over 5,000 families who care enough about the Park to volunteer in it and to give personal financial support for it.

We work with a very diverse population along those 99 blocks to help the Parks Department maintain, beautify, improve, and restore Riverside. The children, youth, and adults who use the Park's playing fields are very important to us. We know the significant health benefits of recreational activity on our fields – organized leagues, school classes, informal use – and we have worked hard to help develop exemplary facilities that encourage an active lifestyle. Some utilize synthetic turf; some are natural grass. We have helped to fund both. Before our first artificial turf project in the Park, we sought out experts and asked many questions about any potential health or safety risks. Certainly such hazards would be inconsistent with our goal of fostering good health. We found nothing that was even close to providing valid scientific evidence of dangers.

As you know, field space in New York City is precious. The three synthetic turf fields in Riverside Park are heavily utilized, very popular, and greatly appreciated, serving literally thousands of users a year. On weekends, they often are used continually from 8:00 am until sunset, and they remain in excellent condition. They do not have to be closed to dry out after a rain or to recuperate from constant use. In fact, they tolerate heavy use extremely well. It is important to realize that the real choice for these fields, especially those on which soccer is played, is not natural grass versus synthetic turf. It is synthetic turf versus dirt.

We at Riverside Park Fund certainly believe it is the City's responsibility, as well as ours, to keep health and safety concerns uppermost and to stay abreast of new information in that respect. In the absence of such concrete, verifiable scientific evidence, however, to mandate the removal of artificial turf surfaces would be very ill-advised. We respectfully urge you to study rigorously and to evaluate specific facilities based on pertinent facts rather than to mandate blanket action. Please move judiciously. Our citizens deserve no less.

Conserving • Improving • Beautifying



"Play For Your Cause"

Hon. Helen Foster
Chair, Committee on Parks & Recreation
250 Broadway, Room 1770
New York, NY 10007

February 9, 2009

Re: Use of Field Turf in NYC Parks & Recreation Fields and City Council Int. No. 739

Dear Councilmember Foster and Members of the Committee on Parks and Recreation:

As a very active user of many of New York City's outdoor fields, both grass and artificial turf (Astroturf and field turf = aka crumb rubber infill), and the father of two boys ages 2 and 4, I wanted to provide my feedback to your committee regarding the use of field turf as a playing surface. First, please allow me to introduce myself and my organization.

ZogSports – Represents 60,000 Young Professionals in NYC and are heavy users of NYC Parks Department fields as well as State Parks, NYC Department of Education fields and private facilities. We are also planning to launch youth sports programs in 2010.

I founded and run ZogSports – a charity-focused, co-ed sports league in New York. We represent about 60,000 young professionals in their 20s and 30s, 99+% of who live and/or work in New York City. We also organize volunteer opportunities and have donated over \$525,000 to charity since I founded ZogSports 6+ years ago after my close call on 9/11. ZogSports plays co-ed touch football, outdoor soccer, softball, kickball and touch rugby on Parks Department fields. In an average week in the spring/summer/fall, ZogSports is able to provide a sports outlet for 10,000-15,000 people using these outdoor facilities.

Arguments for Field Turf (Crumb Rubber Infill) Fields

- 1. Maximize the amount of time park patrons can use the field** – fields available for use within minutes of rain. With grass fields, we need to cancel about 25-30% of all games due to field conditions.
- 2. Heavy, heavy usage** – ZogSports has the fortunate problem of very heavy demand for our sports leagues. Thus, we are always searching for new fields and more time on existing fields. Very often, we come onto a field such as Riverside Park Fields #6 & 7 (107th-108th Streets), Queensbridge Park or Randall's Island as soon as another organization is finished and then play until either another group comes on after us or it gets dark. These fields are used from 8:00am until dark every weekend and 2:00pm (often throughout the day) until dark every weekday as often as the field is open.
- 3. Significant extended playing time/season on the field** – artificial turf extends the season year-round (all 12 months). These fields can remain open every day of the year, while the only way to keep grass fields in reasonable condition is the Central Park model which is unfortunately to close the fields whenever wet, "rest" the fields during the week, limit the types of activities played on those fields and reduce the length of the playable season (5-6 months/year) v. 12 months/year for artificial turf. For example, ZogSports is running a Winter Co-ed Touch Football league starting in January and we are using only NYC Parks Department turf fields to accommodate over 3,000 city residents at Riverside Park, East River Park, Chelsea Park and Queensbridge Park.
- 4. Provide maximum flexibility of field for multiple sports** (i.e., touch football, soccer, softball, touch rugby, etc.) – Certain sports such as soccer and touch football and certain participants (adults v. kids) cause more wear and tear on fields than others. Artificial turf fields can handle the impact much better than grass fields which allows city residents to play any sport they want and not be limited to low impact sports.
- 5. Reduce amount of maintenance of field and security (to keep people off the fields in bad weather)**



"Play For Your Cause"

Field Turf v. AstroTurf

Field Turf is the grass-like turf with the crumb rubber infill that is being discussed in this hearing. AstroTurf is the harder, flat carpet-like turf that is down at Chelsea Park and Asphalt Green. Simply put, our 60,000 participants overwhelmingly prefer field turf to AstroTurf because it is much more similar to grass, significantly softer which reduces injuries and stress on joints and less slippery after rain.

NYC Parks Very Heavy Community Use – Hundreds of Permit Holders

ZogSports is one of thousands of youth, school, community and adult permit holders at NYC Parks Department fields. The parks benefit hundreds of thousands of New Yorkers each year. So maximizing the playable hours on our shared fields is very important to accommodate the largest number of participants.

Response to Int. No. 739

1. **Exposure to individuals limited** – I'm not a scientist, but exposure to these fields would be limited to 1-2 hours/week for any individual. Also, people are standing up and running on these fields and thus generally not lying down or ingesting the crumb rubber infill.
2. **Incredibly disruptive to large population of NYC** – tearing up these fields, as proposed in Int. No. 739, without the funding to replace them or a synthetic alternative that would maintain the same number of hours of playing time would prevent tens of thousands of residents of all ages from playing sports for years
3. **As a parent**, I take my two kids to Riverside Park to play soccer on crumb rubber infill fields. I am more concerned as a parent that they get outside and exercise than I am about the field surface in question. In fact, I much prefer the synthetic field over grass because when using grass fields, we contend with poor drainage, injuries due to the uneven playing surface (some grass and mostly dirt) and even goose feces

I would be very happy to discuss this further and answer any questions. Please feel free to call me at 646-442-2042.

Best regards,

Robert

Robert I. Herzog
CEO & Founder
ZogSports

About ZogSports

ZogSports is a charity-focused, co-ed, social sports club that promotes charity and social action amongst young professionals in New York. ZogSports organizes sports leagues (touch football, soccer, volleyball, kickball, softball, dodgeball and basketball), trips, social events and volunteer opportunities for people in their 20s and 30s. ZogSports donates a portion of all proceeds to charity and helps participants Play For Your Cause™ through charitable donations to winning teams' charities of choice. In four years, ZogSports has about 60,000 people participating in their activities and has donated approximately \$525,000 to charity.

Robert Herzog conceived ZogSports after his close call on 9/11. He decided to build on the tremendous charity and social action he witnessed post 9/11 and build community in New York. Through ZogSports' athletic, social and social action opportunities, we encourage New Yorkers to maintain perspective and a more balanced lifestyle by having fun while also giving something back to the community.

**Testimony Opposing the Abolition
of Synthetic Turf Fields in New York City**

**Submitted by Dana DiPrima, Commissioner, West Side Soccer League
on behalf of the children and families who participate in the League**

February 9, 2009

On behalf of a community of over 8,000 parents and more than 4,000 children who participate in recreational soccer in Manhattan via West Side Soccer League throughout the year, I submit the following 5 key concerns about the laws proposed regarding artificial turf, in particular regarding Introduction No. 739 proposed by Council Members Baez, James and Gioia and later supported by Council Member Mark-Viverito.

The overwhelming majority of league members call for a rational process that does not assume all is bad or all is good, but rather hopes that the City Council will use facts to determine policies with regard to our health and safety. They also hope that the City Council will use a rational process that does not leave our children without suitable places to play sports.

1. Introduction No. 739 seems reactionary.

One turf field was closed because it tested positive for unacceptable levels of lead. Good move. But now all turf fields and their infill - which did not test positive for unacceptable levels of lead should be removed or replaced? If that is the logic we are using then when one child fails a math test, all children should be given a failing grade. When one apple in the barrel is rotten, all the apples should be thrown out. It is reactionary - reckless even -- to throw out perfectly safe turf fields or to abolish the materials they are made with because one failed to meet standards.

2. Introduction No. 739 does not take into consideration the science of the matter.

Thomas Jefferson Field tested positive for 502 ppm of lead. This measurement failed to meet the standard federal EPA guideline that warns of risk to children under 6 at lead levels over 400 ppm.

Under the same testing guidelines, other turf fields that were tested including three fields that were renovated, in part, with support from West Side Soccer League and its families - 101st, 103rd and 107th Street fields in Riverside Park - showed NO indication for lead at all or in the case of 107th, showed a mere 40 ppm of lead indication (less than one tenth of the base level for warning).

If we allow the science lead us, we can take a rational approach to preserving our City's recreational resources.

3. Introduction No. 739 does not take into consideration the expense of the proposed solution or suggest from where such funds might come.

How do the council members proposing this law suggest that all of the turf fields in the City be replaced in the next 12 months? With whose funds? Taxpayer dollars? Private funds? When will those become available? How do they propose that all of these projects be completed so that our children do not have to miss one, two, three or more seasons of recreational sports?

4. Introduction No. 739 does not take into consideration what preceded some of our city's turf fields.

Fields that are now synthetic turf were at one vacant lots, asphalt playgrounds or, in some cases, grass. While the grass lasted, sports were only allowed when conditions were optimal. Mother nature and lack of proper maintenance quickly turned the grass fields into dust bowls and mud pits. When the grass left so, often, did the community of families. A new community moved in. They left behind broken bottles, syringes and other health hazards.

Even some of the best-maintained grass fields - in prime locations with considerable financial support from private and government sources - are frequently closed to recreational sports to protect the grass when it's too wet or too cold. The need to protect grass fields can jeopardize up to half of an athletic season, easily. Turf fields provide a practical complement to grass fields in the city - offering playable surfaces when grass fields are closed -- and are preferable in locations where maintenance is underfunded or unlikely.

5. Introduction No. 739 does not consider the health benefits that having ample fields provide.

Without citing national or local statistics, our PE programs are limited and waning and our kids are suffering from a lack of physical activity resulting in serious health concerns, including an alarming increase in the rate of childhood obesity. It seems the energy focused on synthetic fields that pose no evident health risk would be better spent on figuring out how to get more of our kids outside for more physical activity, not diminishing the limited resources they have.

While the City Council and the Committee on Parks & Recreation are forced - by proposals like Introduction No. 739 -- to consider fixing something that isn't broken, it is neglecting the many spaces that could be converted into playgrounds and athletic fields where children who need them most are waiting.

* * * * *

On behalf of West Side Soccer League, I implore the City Council and its members, especially the members who proposed Introduction No. 739, to consider a more rational, science-based, financially prudent, health-first, child-friendly approach that does not suggest we throw out all the apples because of one bad one.

From: Nathan Newman <natefit@nyc.rr.com>
Subject: **Re: Proposed Legislation RE: Turf Fields**
Date: February 8, 2009 10:14:31 AM EST
To: commish@wssl.org
Cc: Michael Titowsky <michael.titowsky@mdafny.com>, Jimmy Coffey <jcoffeywssl@gmail.com>

Clearly we need more info: Is the lead airborne? How great is the risk to a 12 yr old vs a toddler? Etc...

I coached a season at the 114th field. Its a disaster for a variety of reasons, including the friction with the locals. Close it down. However, as far as fields that test fine...

At this point, Its a total overreaction. And if they start closing turf fields it will be the end of WSSL, especially in Spring when we have no access to Central Park. As a certified athletic trainer for over a decade, a coach, and most of all a parent, Im willing to "risk" my daughter being exposed for a few hrs total over the course of a 2 1/2 month season, against losing the numerous benefits of exercise. We live in nyc and are exposed to a constant barrage of toxins every day. If you want pristeen, go live in the Colorado mountains.

Nathan Newman

On Feb 8, 2009, at 9:40 AM, AYSO on behalf of Dana DiPrima wrote:

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

Many of you have written me recently to inquire about proposed city legislation that would ban all synthetic turf fields. This is, indeed, a serious issue.

This fall, after the close of our soccer season, I got a call from the commissioner of fields letting me know that Thomas Jefferson Field on 114th and 1st Avenue was being closed because it tested positive for lead. All other turf fields were tested as well, but tested fine with no alarming lead or other indications. Thomas Jefferson Field, it seems, has sparked concern with the City Council resulting in legislation proposals that would eliminate all turf fields... even the ones that pass health and safety tests. It is important to know that Thomas Jefferson is significantly older than our other turf fields and did not benefit from the new technology that we have incorporated into new projects. Our latest field renovation, on 101st in Riverside Park, uses ecofill, a combination of rubber from recycled sneakers instead of tires and sand.

For your information, the proposed legislation -- three proposals that I know of -- calls for testing and evaluation of surfaces/materials used (sounds like a good idea), signage warning regarding the potentially hot temperatures of artificial surfaces (ok, if you must) and the REMOVAL of all fields that use rubber fill of any kind and all synthetic fields, period (now, that sounds a bit draconian to me). The latter proposed legislation states,

From: Spiro Condos <spirocondos@nyc.rr.com>
Subject: Re: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 10:20:34 AM EST
To: commish@wssl.org

To whom it may concern,

This past fall, my daughter Olivia had three rainouts out of ten games because she was playing on real grass in Central Park. The prior spring she had no rainouts at all while she played on the artificial turf at 101st and Riverside. She played on the hottest days at both fields and was equally tired and sweaty on both surfaces. She has suffered no ill effects from playing on artificial turf and I wholeheartedly support using artificial turf so we can simply play soccer without having to worry about the weather.

Yours truly,

Spiro Condos,
Olivia Condos' father and coach
On Feb 8, 2009, at 10:07 AM, AYSO on behalf of Dana DiPrima wrote:

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

Many of you have written me recently to inquire about proposed city legislation that would ban all synthetic turf fields. This is, indeed, a serious issue.

This fall, after the close of our soccer season, I got a call from the commissioner of fields letting me know that Thomas Jefferson Field on 114th and 1st Avenue was being closed because it tested positive for lead. All other turf fields were tested as well, but tested fine with no alarming lead or other indications. Thomas Jefferson Field, it seems, has sparked concern with the City Council resulting in legislation proposals that would eliminate all turf fields... even the ones that pass health and safety tests. It is important to know that Thomas Jefferson is significantly older than our other turf fields and did not benefit from the new technology that we have incorporated into new projects. Our latest field renovation, on 101st in Riverside Park, uses ecofill, a combination of rubber from recycled sneakers instead of tires and sand.

For your information, the proposed legislation -- three proposals that I know of -- calls for testing and evaluation of surfaces/materials used (sounds like a good idea), signage warning regarding the potentially hot temperatures of artificial surfaces (ok, if you must) and the REMOVAL of all fields that use rubber fill of any kind and all synthetic fields, period (now, that sounds a bit draconian to me). The latter proposed legislation states, verbatim:

b. It shall be unlawful to use crumb rubber or crumb rubber infill for any purpose in any park or for any surface intended for use at any time for recreational purposes within the

From: "Berti, Mark" <mark.ber ti@us.mizuho-sc.com>
Subject: Re: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 10:22:12 AM EST
To: commish@wssl.org
Cc: susanberti@aol.com, foster@council.nyc.gov

Dana,

We've been parents in the WSSL for ~14-15 yrs. Our three children have played on fields by the Boat basin at W79th St (mostly dirt), Ward's Island (subject to rain, often cancelled), RSD Park South (goose feces contaminated), CP's North Meadow (excellently maintained grass, never a full season), Dyckman (poorly maintained grass, mostly dirt), RSD Park at 101 St (carpet) and 107 St (rubber crumb, hands down the best).

If that wasn't enough, our kids attended St Hilda's and used the dusty, horribly maintained fields in RSD Park before the turf went in.

We agree 100% with you. We couldn't have said it better.

Mark & Susan Berti

From: AYSO on behalf of Dana DiPrima
To: Berti, Mark
Sent: Sun Feb 08 09:55:43 2009
Subject: Proposed Legislation RE: Turf Fields

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

Many of you have written me recently to inquire about proposed city legislation that would ban all synthetic turf fields. This is, indeed, a serious issue.

This fall, after the close of our soccer season, I got a call from the commissioner of fields letting me know that Thomas Jefferson Field on 114th and 1st Avenue was being closed because it tested positive for lead. All other turf fields were tested as well, but tested fine with no alarming lead or other indications. Thomas Jefferson Field, it seems, has sparked concern with the City Council resulting in legislation proposals that would eliminate all turf fields... even the ones that pass health and safety tests. It is important to know that Thomas Jefferson is significantly older than our other turf fields and did not benefit from the new technology that we have incorporated into new projects. Our latest field renovation, on 101st in Riverside Park, uses ecofill, a combination of rubber from recycled sneakers instead of tires and sand.

For your information, the proposed legislation -- three proposals that I know of -- calls for testing and evaluation of surfaces/materials used (sounds like a good idea), signage warning regarding the potentially hot temperatures of artificial surfaces (ok, if you must) and the REMOVAL of all fields that use rubber fill of any kind and all synthetic fields, period (now, that sounds a bit draconian to me). The latter proposed legislation states, verbatim:

From: David Warren <david@warren1.net>
Subject: Re: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 11:05:09 AM EST
To: commish@wssl.org

Please add this letter:

To Whom it May Concern,

Of course, safety of our children and all New Yorkers should be of utmost priority. But in a nation that is becoming increasingly obese, we simply must provide opportunities for our children (and everyone) to get outdoors more and get exercise. The introduction of synthetic turf fields in Manhattan over the last few years has provided *dramatically* more opportunities for outdoor exercise. My own son had his fall soccer scheduled on grass fields in Central Park. No fewer than 4 of his Sunday matches were "rained out" and two of the others were played in complete mud. This does not encourage him to want to play again. Friends of mine have children who played on synthetic turf fields, were able to play every week and are now lifelong soccer lovers.

There are simply too many of us in too little space on this island to deprive our citizens of the pleasures of outdoor activity. Most professional football teams now play on synthetic turf and no tests have shown any adverse health effects of playing once or twice per week on such surfaces. I beg the city council to reconsider hasty legislation that would deprive so many on unproven health worries.

Sincerely,

David Warren

On Sun, Feb 8, 2009 at 9:46 AM, AYSO on behalf of Dana DiPrima <inleague@wssl.org> wrote:

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

Many of you have written me recently to inquire about proposed city legislation that would ban all synthetic turf fields. This is, indeed, a serious issue.

This fall, after the close of our soccer season, I got a call from the commissioner of fields letting me know that Thomas Jefferson Field on 114th and 1st Avenue was being closed because it tested positive for lead. All other turf fields were tested as well, but tested fine with no alarming lead or other indications. Thomas Jefferson Field, it seems, has sparked concern with the City Council resulting in legislation proposals that would eliminate all turf fields... even the ones that pass health and safety tests. It is important to know that Thomas Jefferson is significantly older than our other turf fields and did not benefit from the new technology that we have incorporated into new projects. Our latest field renovation, on 101st in Riverside Park, uses ecofill, a combination of rubber from

From: lkuslansky@trialgraphix.com
Subject: Re: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 11:06:25 AM EST
To: commish@wssl.org

Hi Dana,

Thank you for updating us. I would request scientific research that proves harm from non-lead-containing artificial turf under conditions similar to those on the fields we use.

In addition, I would discuss the risk/benefit, i.e., many NYC playgrounds have significantly decreased injuries from hard surfaces thanks to softer landings.

Finally, I would come armed with comparisons that show the differences between the older and newer surfaces to show why the newer ones are safe(r).

Good luck and thank you.

Laurie R. Kuslansky, Ph.D., Director of Business Development, Jury Consulting
TrialGraphix | Kroll Ontrack
216 E. 45th Street, New York, NY 10017
212-687-7100 | Fax 212-687-0411 | Cell 917-488-8640
www.trialgraphix.com | www.krollontrack.com

From: Tom Ruggieri <truggieri@advisen.com>
Subject: RE: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 11:40:53 AM EST
To: commish@wssl.org
▶ 1 Attachment, 6.7 KB

Dear Dana,

I agree whole heartedly with your analysis and commend the improvements we have witnessed over the last decade. We need more fields that can be maintained easily not less. We have all experienced the disasterous conditions of the dustbowl fields of yesteryear and we should not go back to that. Ofcourse it makes sense to assure that none of them would have chemicals harmful to our children (and if they test positive then close and rebuild them), and heat is something one should monitor on anygiven time - certainly signage would assist the uninformed, but doing away with these fields would be plain stupidity.

Regards
Tom

Thomas P Ruggieri
Father of 3

From: AYSO on behalf of Dana DiPrima [<mailto:inleague@wssl.org>]
Sent: Sun 2/8/2009 9:53 AM
To: Tom Ruggieri
Subject: Proposed Legislation RE: Turf Fields

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

Many of you have written me recently to inquire about proposed city legislation that would ban all synthetic turf fields. This is, indeed, a serious issue.

This fall, after the close of our soccer season, I got a call from the commissioner of fields letting me know that Thomas Jefferson Field on 114th and 1st Avenue was being closed because it tested positive for lead. All other turf fields were tested as well, but tested fine with no alarming lead or other indications. Thomas Jefferson Field, it seems, has sparked concern with the City Council resulting in legislation proposals that would eliminate all turf fields... even the ones that pass health and safety tests. It is important to know that Thomas Jefferson is significantly older than our other turf fields and did not benefit from the new technology that we have incorporated into new projects. Our latest field renovation, on 101st in Riverside Park, uses ecofill, a combination of rubber from recycled

From: prest7on@aol.com
Subject: Re: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 11:48:52 AM EST
To: commish@wssl.org

Dana,

Hi - it's Jan. Hope all is well. As the head referee for Region 611 for over ten years, ending last year, and as a parent of a WSSL player for 12 years, along with being a certified referee in both the WSSL and WSSF for that long, after reading what you just emailed me, I totally agree with your concerns and issues about the fields. If they are SAFE, then they are safe, if they are not, then they need to be fixed. To have our children suffer because legislation puts a "blanket ban" on all turf fields because "some" are indeed not safe is abusive to our children, nothing less. Let these people come down to the fields and let them see our kids play before they make a blanket, uncaring and thoughtless rule. As you know, this law will affect over 4,000 children. Let them focus there work on the economy and let our children play. What these people need to do, is to do their due diligence and proper research before they go about disrupting our children, our league and our neighborhood.

Jan

-----Original Message-----

From: AYSO on behalf of Dana DiPrima <inleague@wssl.org>
To: prest7on@aol.com
Sent: Sun, 8 Feb 2009 9:52 am
Subject: Proposed Legislation RE: Turf Fields

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

Many of you have written me recently to inquire about proposed city legislation that would ban all synthetic turf fields. This is, indeed, a serious issue.

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For your information, the proposed legislation -- three proposals that I know of -- calls for testing and evaluation of surfaces/materials used (sounds like a good idea), signage warning regarding the potentially hot temperatures of artificial surfaces (ok, if you must) and the REMOVAL of all fields that use rubber fill of any kind and all synthetic fields, period (now, that sounds a bit draconian to me). The latter proposed legislation states,

From: Deborah Johnson <djonlex@yahoo.com>
Subject: Re: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 11:59:02 AM EST
To: commish@wssl.org
▶ 1 Attachment, 12.2 KB

Honorable Helen Foster Chair, Committee on Parks & Recreation,

I am a single parent of two healthy boys who require an enormous amount of exercise to stay fit and healthy. Each year as they get older after school sports get cut because of too few playing fields. I have relied on AYSO a parent run organization to play sports on Saturday, so that my children could play soccer one day a week every weekend since 2001. This has given our family, a parent child bonding, and cheering experience of love. To loose all our playing fields based from the concerns of one contaminated field will close the dreams of many children growing up now.

The beauty of sports ties in our education, that we learn to play together, get along as a team, build muscles healthy bodies, sports creates self esteem, make friends and live with tremendous memories. The how to solve the astro turf problem in a time where money is cut from everywhere may leave our children to the streets of NYC. Playing on our streets will come next if all the astro turf playing fields are closed for repairs. We can find danger in everything we do, could we take a longer look into all of the ramifications of this proposal. Could parents sign a release allowing their children to play their team sports on the fields till the problem as perceived is stopped? To ban all astro turf fields will make these coming years unbearable for all children who need more play time as it is. This proposal to ban all astro fields will create a different health risk for us all. Please take creative care on how you decide on this proposal.

Deborah Johnson



<http://www.DeborahJohnsonNYC.com>
212-288-1362

Deborah Johnson
djonlex@yahoo.com

From: gshalperin@aol.com
Subject: Artificial Turf Proposed Legislation
Date: February 8, 2009 11:59:01 AM EST
To: foster@council.nyc.gov
Cc: commish@wssl.org

Dear Hon. Foster:

I am a resident of the Upper West Side and a parent of a 13 year old boy who has been enrolled in West Side Soccer League (WSSL) for a good portion of his life. I understand that there is proposed legislation before the City Council regarding the use of certain types of rubber in any park or for any surface intended for recreational use. While I certainly appreciate the City Council's efforts to provide a safe environment for our children, my only hope is that before acting the City Council will fully investigate the matter so that it can reach the proper conclusion. One of the greatest things that have happened in the city's parks over the years is the use of artificial turf. While I would love nothing more than to be able to have my child play on natural turf, there is simply no way that natural turf can be maintained given how often the fields are used. Before artificial turf was installed on the fields in Riverside Park where many of WSSL games are played, the children were forced to play on fields that were veritable dustbowls strewn with rocks and, oftentimes, broken glass. While I do not give short shrift to the potential health issues of artificial turf, I hope that the City Council will not make a "knee jerk" reaction to the problem but will carefully study it before taking action.

I lend my full support to Dana DiPrima, the Commissioner of WSSL, who I understand is intending to address the City Council tomorrow on this issue. I believe that Ms. DiPrima represents the opinions of many parents of children in WSSL.

Respectfully yours,

Guy S. Halperin
201 West 89th Street - Apt. 5A
New York, NY 10024

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From: Heidi Snellenburg <heidims@nyc.rr.com>
Subject: Re: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 12:55:43 PM EST
To: commish@wssl.org

As you say, while it makes sense to test surfaces for contaminants, it makes no sense to remove or cease production of fields using materials which have been tested and found safe. This is an ignorant and alarmist response, wasteful of resources previously committed and potentially wasteful of future resources (labor for example) that could be much better spent elsewhere.

Heidi Snellenburg
parent

----- Original Message -----

From: AYSO on behalf of Dana DiPrima
To: heidims@nyc.rr.com
Sent: Sunday, February 08, 2009 9:49 AM
Subject: Proposed Legislation RE: Turf Fields

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

Many of you have written me recently to inquire about proposed city legislation that would ban all synthetic turf fields. This is, indeed, a serious issue.

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For your information, the proposed legislation -- three proposals that I know of -- calls for testing and evaluation of surfaces/materials used (sounds like a good idea), signage warning regarding the potentially hot temperatures of artificial surfaces (ok, if you must) and the REMOVAL of all fields that use rubber fill of any kind and all synthetic fields, period (now, that sounds a bit draconian to me). The latter proposed legislation states, verbatim:

- b. It shall be unlawful to use crumb rubber or crumb rubber infill for any purpose in any park or for any surface intended for use at any time for recreational purposes within the city of New York.
- c. All parks or other surfaces intended for use at any time for recreational purposes within the city of New York that presently contain crumb rubber or crumb rubber infill

From: YYAA14@aol.com
Subject: Yorkville Youth Athletic Association
Date: February 8, 2009 2:06:58 PM EST
To: commish@wssl.org
Cc: lancewill3@live.com

Dana DiPrima,

My name is Arlene Virga and I represent the Yorkville Youth Athletic Association. Our league used the fields at Thomas Jefferson that were closed this winter due to lead. One of our parents forwarded me your excellent letter regarding the turf field issue. After speaking with Scott from Randall's Island, I felt that this would be a non-issue and opted to not miss another day at my day job.

However, after reading your e-mail to your constituents I feel I should send a representative to speak for our program. My request is two fold. Can you meet Lance Williams tomorrow and help him get into City Hall and please tell me the time and room that the hearing will be held in. I have testified several times on different issues but I did not keep the paper work on this issue after speaking with Scott. Perhaps you can scan it to me at yyaa14@aol.com and to lancewill3@live.com I would appreciate your help very much.

Sincerely,
Arlene Virga
Executive Director
Yorkville Youth Athletic Association

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From: "A.J. Bosco" <ajbosco@sprintmail.com>
Subject: **Re: Proposed Legislation RE: Turf Fields**
Date: February 8, 2009 2:49:37 PM EST
To: commish@wssl.org
Cc: Alan Madison <armjam@verizon.net>
Reply-To: "A.J. Bosco" <ajbosco@sprintmail.com>

Dana:

Thanks for sending out this email. As a parent of two children who use NYC parks as their main place of recreation - both within organizations (eg. WSSL, WSL) and on their own, I am against this proposal. Have the safety issues with artificial turf fields been thoroughly enough proven to warrant such drastic action? If turf fields are removed, how and when will they be replaced and at whose expense? Where will children play in the meantime? I would think that playing on turf fields in Riverside Park is just as safe, if not safer than playing next to a sewage treatment plant on Ward's Island. The League has done a great service to its players and the entire upper westside community in getting these fields installed and ripping them up would be a huge waste.

Also, I was at the Westside Little League annual meeting this morning and this issue was not mentioned. Do they have a rep testifying tomorrow too?

Good luck,

A.J. Bosco

-----Original Message-----

From: AYSO on behalf of Dana DiPrima
Sent: Feb 8, 2009 10:09 AM
To: ajbosco@sprintmail.com
Subject: Proposed Legislation RE: Turf Fields

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

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From: Gregg Solomon <gmsolomon5@aol.com>
Subject: Proposed Legislation re: Turf Fields
Date: February 8, 2009 3:46:01 PM EST
To: foster@council.nyc.gov

Ms. Foster,

I am a 23 year resident of the Upper West Side and my three sons have collectively played about 15 seasons of West Side Soccer League and West Side Little League. I am presently on the West Side Soccer League Board of Directors and serve as its chief referee.

I understand that in the aftermath of finding lead at the Thomas Jefferson Field on 114th Street and 1st Avenue, that field has been temporarily closed, and that even though all other city turf fields have been since tested and passed safety tests, there is legislation being proposed that would cause all turf fields in Manhattan to be ripped up. I applaud what appears to be a quick response at Thomas Jefferson Field but am appalled by what seems to be an extreme, unfounded, and irrational legislative response to other turf fields.

In the last six months I refereed West Side Soccer League games in Central Park (North Meadows, grass fields), 101/Riverside (brand new turf field), 103/Riverside (few years old turf field), 107/Riverside (few years old turf field) and Trump Park (grass/dirt field). Previously, my sons played soccer on grass fields at Dyckman Field and Kantor Fields and the turf field at 101/Amsterdam and have played baseball on grass/dirt fields up and down Riverside Park and the turf field at 103/Riverside.

It appears to me from this collective experience that the city struggles to find a proper balance between maintaining its grass fields and allowing the fields to be used. The North Meadow fields, which are in a pristine setting, suffer from poor drainage. An inch of rain on a Thursday generally results in fields to be closed on Saturday. I would estimate over the past several years that close to 1/3 of West Side Soccer League games in North Meadow were cancelled due to wet conditions. By way of contrast, soccer games can be played on the turf fields under all conditions (as a practical matter, about 5% of the soccer games on the turf fields have been cancelled the past few seasons due to extreme weather, such as Noreasters blowing through). All else equal, as a parent I would much rather my children be able to play soccer or baseball on Manhattan's turf fields than on its grass fields.

The game I refereed at Trump Park last Fall is an example of the worst of the city grass field experience. The field had so little grass that it reminded me of stories of Oklahoma during the great depression, when the land was stripped bare due to poor farming practices and a long drought. I don't think the children risked meaningfully greater risk of injury by playing on that field vs. a grass or turf field, but playing in dust rather than on an acceptable surface takes a lot of the fun out of the game for all participants.

As the city faces a wrenching financial outlook, it is inconceivable to me that it will be able to apply enough resources to keep its grass fields from turning to dust fields. I have never seen a financial analysis comparing the upfront cost of installing turf vs. the annual savings in maintenance, but I can tell you that the turf fields at 101, 103 and 107/Riverside, where I spent a lot of time this past fall seasons, offer the players (and referees) a resilient, comfortable, and from I can tell, safe surface on which they can play.

I have seen various studies of the pros and cons of turf fields. I am certainly not an expert in the possible risks associated with turf fields, but do not think that there is any definitive science that shows risks of a

magnitude that begin to approach the benefits of the turf fields.

The 101/Riverside field, which was recarpeted in the last year, is a great example of a significant upgrade. Eventually, with use, turf fields need to be replaced. The technology and safety of the turf has apparently improved over time. I expect that the city will get years and years of quality use from that field, with state of the art, safer materials. If the field had been converted to grass, I suspect it would have in short order suffered from the neglect and overuse problems I observed at Trump Park.

I strongly encourage the city to reject any extreme legislation that might call for the removal of any existing turf fields that are in compliance with all existing safety standards.

Sincerely,

Gregg Solomon

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From: John Irwin <irwin100@earthlink.net>
Subject: Re: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 4:42:21 PM EST
To: commish@wssl.org

Dear Ms. DiPrima

Thank you for all you do. My family has been in the WSSL every season since Emily turned 5, six years ago. It's one of the handful of first class organizations I have been part of in my life. You do a great job.

For what's worth, the only angle you don't have covered in your approach below is cost. The city was rich for 15 years, but now resources will be scarce again. The city should not destroy facilities that have been tested and shown safe unless in the same action it allocates funds to restore (and if grass, maintain) them. It can't afford to do this, so the fields will be withdrawn from use indefinitely. People (not just WSSL families) will go bananas.

I'll be glad to send a letter to Ms Foster as well.

John Irwin

On Feb 8, 2009, at 10:00 AM, AYSO on behalf of Dana DiPrima wrote:

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

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For your information, the proposed legislation -- three proposals that I know of -- calls for testing and evaluation of surfaces/materials used (sounds like a good idea), signage warning regarding the potentially hot temperatures of artificial surfaces (ok, if you must) and the REMOVAL of all fields that use rubber fill of any kind and all synthetic fields,

From: Tom Milne <trobbinsmilne@yahoo.com>
Subject: Re: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 4:57:36 PM EST
To: commish@wssl.org
Reply-To: trobbinsmilne@yahoo.com

Dana,

While it's terrific news that folks are looking to remove lead from the fields, eliminating all artificial turf fields seems like a huge overreaction. It's just so cool to be able to play on Saturdays when it rains a bit on Friday.

I'd be very surprised if the Kantor fields are any healthier, especially after a good rain.

Thanks for letting us all know, I'll send a note in to the folks looking into this.

-- On **Sun, 2/8/09, AYSO on behalf of Dana DiPrima <inleague@wssl.org>** wrote:

From: AYSO on behalf of Dana DiPrima <inleague@wssl.org>
Subject: Proposed Legislation RE: Turf Fields
To: trobbinsmilne@yahoo.com
Date: Sunday, February 8, 2009, 9:42 AM

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

Many of you have written me recently to inquire about proposed city legislation that would ban all synthetic turf fields. This is, indeed, a serious issue.

This fall, after the close of our soccer season, I got a call from the commissioner of fields letting me know that Thomas Jefferson Field on 114th and 1st Avenue was being closed because it tested positive for lead. All other turf fields were tested as well, but tested fine with no alarming lead or other indications. Thomas Jefferson Field, it seems, has sparked concern with the City Council resulting in legislation proposals that would eliminate all turf fields... even the ones that pass health and safety tests. It is important to know that Thomas Jefferson is significantly older than our other turf fields and did not benefit from the new technology that we have incorporated into new projects. Our latest field renovation, on 101st in Riverside Park, uses ecofill, a combination of rubber from recycled sneakers instead of tires and sand.

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b. It shall be unlawful to use crumb rubber or crumb rubber infill for any purpose in any park or for any surface intended for use at any time for recreational purposes

From: John Irwin <irwin100@earthlink.net>
Subject: Proposed Legislation re Turf Fields
Date: February 8, 2009 5:42:27 PM EST
To: foster@council.nyc.gov
Cc: commish@wssl.org

To: Hon Helen Foster
Chair, Committee on Parks and Recreation
New York City

Dear Ms Foster

I understand from the West Side Soccer League, where my daughter has played and I have coached and refereed for six years, that the city is considering legislation regarding playing fields made of artificial turf, and that one of the proposals would effectively ban turf fields. The legislation contains the provision:

" All parks or other surfaces intended for use at any time for recreational purposes within the city of New York that presently contain crumb rubber or crumb rubber infill shall be changed within one year from the enactment of this legislation to materials that do not contain crumb rubber or crumb rubber infill."

My understanding from the WSSL is that the fields were tested for lead and other harmful substances and all but one were found to be safe. These fields ought to be left alone. In the city's current straitened situation, the effect of "changing" the fields, as the legislation puts it, would be to close them indefinitely. There will be no budget for rebuilding them, for planting grass, or for maintaining grass.

The fields are well-liked, heavily-used, attractive facilities built at great expense. Any proposal that would provide only a theoretical protection against chemicals should be weighed against an estimate of the cost of rebuilding them--and against the more likely cost, that of having them withdrawn from use indefinitely.

We are lucky to have the parks facilities that the city has built during its recent prosperous years. It would be a shame to make the public afraid of them, or to risk wasting them based on unfounded fears. I urge you to steer the debate to a result based on good sense.

Thank you very much.

John Irwin
62 West 89th Street

From: Martin Wolff <mjwolff@nyc.rr.com>
Subject: RE: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 6:20:37 PM EST
To: commish@wssl.org

Although I appreciate the concern for the well being of players on synthetic turf, I also agree with your feeling that the proposed legislation is "draconian." As a coach who has been frustrated by Saturday night drizzle and a father who is concerned about the well-being of my daughter, I would prefer a more measured approach that includes testing for all fields that are found to be hazardous. Quite frankly, for the present economic conditions I think that an appropriate response to a positive lead test would be a prominently posted warning for a low level of lead and immediate replacement for a high level of lead. Given the disaster with the Randall's Island fields, the City can hardly afford to cut back on the number of available fields – except in true interest of residents' safety.

Furthermore, I would prefer to see legislation that required proof of material safety before approval for usage, instead of banning a group of materials, some of which may well be safe. The current proposed legislation smacks of micromanagement and may deprive our City of valuable playing fields. I sincerely hope that the City government is capable of better wording.

Sincerely,

Martin Wolff

From: AYSO on behalf of Dana DiPrima [<mailto:inleague@wssl.org>]
Sent: Sunday, February 08, 2009 9:56 AM
To: mjwolff@nyc.rr.com
Subject: Proposed Legislation RE: Turf Fields

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

Many of you have written me recently to inquire about proposed city legislation that would ban all synthetic turf fields. This is, indeed, a serious issue.

This fall, after the close of our soccer season, I got a call from the commissioner of fields letting me know that Thomas Jefferson Field on 114th and 1st Avenue was being closed because it tested positive for lead. All other turf fields were tested as well, but tested fine with no alarming lead or other indications. Thomas Jefferson Field, it seems, has sparked concern with the City Council resulting in legislation proposals that would eliminate all turf fields... even the ones that pass health and safety tests. It is important to know that Thomas Jefferson is significantly older than our other turf fields and did not benefit from the new technology that we have incorporated into new projects. Our latest field renovation, on 101st in Riverside Park, uses ecofill, a combination of rubber from recycled sneakers instead of tires and sand.

For your information, the proposed legislation -- three proposals that I know of -- calls for testing and evaluation of surfaces/materials used (sounds like a good idea), signage warning regarding the potentially hot temperatures of artificial surfaces (ok, if you must) and the REMOVAL of all fields that use rubber fill of any kind and all synthetic fields, period (now, that sounds a bit draconian to me). The latter proposed

From: Kimberly and Zachary White <zkwhite@gmail.com>
Subject: Re: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 7:18:00 PM EST
To: commish@wssl.org

Just like to agree with you. It is ridiculous and illogical to ban surfaces that have been tested and proven safe, merely because they *resemble* another surface that is not safe.

Kimberly White

On Sun, Feb 8, 2009 at 10:15 AM, AYSO on behalf of Dana DiPrima <inleague@wssl.org> wrote:

The following email was sent by Dana DiPrima via the inLeague system.

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This fall, after the close of our soccer season, I got a call from the commissioner of fields letting me know that Thomas Jefferson Field on 114th and 1st Avenue was being closed because it tested positive for lead. All other turf fields were tested as well, but tested fine with no alarming lead or other indications. Thomas Jefferson Field, it seems, has sparked concern with the City Council resulting in legislation proposals that would eliminate all turf fields... even the ones that pass health and safety tests. It is important to know that Thomas Jefferson is significantly older than our other turf fields and did not benefit from the new technology that we have incorporated into new projects. Our latest field renovation, on 101st in Riverside Park, uses ecofill, a combination of rubber from recycled sneakers instead of tires and sand.

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- b. It shall be unlawful to use crumb rubber or crumb rubber infill for any purpose in any park or for any surface intended for use at any time for recreational purposes within the city of New York.
- c. All parks or other surfaces intended for use at any time for recreational purposes within the city of New York that presently contain crumb rubber or crumb rubber infill shall be changed within one year from the enactment of this legislation to materials that do not contain crumb rubber or crumb rubber infill.
- d. For six months following the enactment of this legislation, there shall be no construction or renovation in any park or of any surface intended for use at any time for recreational purposes within the city of New York that utilizes any material made in whole or in part from synthetic or artificial turf.

From: Fran Kemp <fran.kemp@verizon.net>
Subject: RE: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 8:08:46 PM EST
To: commish@wssl.org

I am really upset by this. my son has been playing for WSSL for seven years & it's one of the best things he does. I sent an email to Foster. if there is anything else we can do, please let me know. thanks.

Fran Kemp (soccer mom)

-----Original Message-----

From: AYSO on behalf of Dana DiPrima [<mailto:inleague@wssl.org>]
Sent: Sunday, February 08, 2009 09:38 AM
To: fran.kemp@verizon.net
Subject: Proposed Legislation RE: Turf Fields

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

Many of you have written me recently to inquire about proposed city legislation that would ban all synthetic turf fields. This is, indeed, a serious issue.

This fall, after the close of our soccer season, I got a call from the commissioner of fields letting me know that Thomas Jefferson Field on 114th and 1st Avenue was being closed because it tested positive for lead. All other turf fields were tested as well, but tested fine with no alarming lead or other indications. Thomas Jefferson Field, it seems, has sparked concern with the City Council resulting in legislation proposals that would eliminate all turf fields... even the ones that pass health and safety tests. It is important to know that Thomas Jefferson is significantly older than our other turf fields and did not benefit from the new technology that we have incorporated into new projects. Our latest field renovation, on 101st in Riverside Park, uses ecofill, a combination of rubber from recycled sneakers instead of tires and sand.

For your information, the proposed legislation -- three proposals that I know of -- calls for testing and evaluation of surfaces/materials used (sounds like a good idea), signage warning regarding the potentially hot temperatures of artificial surfaces (ok, if you must) and the REMOVAL of all fields that use rubber fill of any kind and all synthetic fields, period (now, that sounds a bit draconian to me). The latter proposed legislation states, verbatim:

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- d. For six months following the enactment of this legislation, there shall be no

From: Georgia Levenson Keohane <glevenson@yahoo.com>
Subject: Re: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 8:23:50 PM EST
To: commish@wssl.org

Hi Dana,

this seems to make no sense.

(1) I am having trouble understanding the difference between turf and rubber fill. Are they categorizing them differently, or banning both? Isn't rubber infill the same substance that they now use for ALL city playgrounds? Are they proposing closing those as well?

(2) there is no way, in this economic climate, that the city can or will rebuild new fields. Therefore, if they shut them down, they will be closing vital recreational facilities in neighborhoods that, for the most part, aren't exactly awash in community resources <http://www.nycgovparks.org/befitnyc/soccer>. The odds that these fields will be replaced by new and improved ones any time soon are pretty slim. (Unless a portion of NYC's stimulus dollars were directed to this project... an interesting idea).

(3) What is wrong with testing all the fields, and closing those indicate the presence of lead (I might add that these kids are mostly running on the fields, not eating them). Or if that is too complicated or time consuming, closing the ones of a certain age, and testing the rest?

What time is the hearing tomorrow? Good luck. I'd love to know the outcome. And if it's possible to get a transcript, please let me know (I write on public policy issues, often related to NYC, and it's possible I could turn this into an op-ed).

Georgia

--- On **Sun, 2/8/09, AYSO on behalf of Dana DiPrima <inleague@wssl.org>** wrote:

From: AYSO on behalf of Dana DiPrima <inleague@wssl.org>
Subject: Proposed Legislation RE: Turf Fields
To: glevenson@yahoo.com
Date: Sunday, February 8, 2009, 10:03 AM

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

Many of you have written me recently to inquire about proposed city legislation that would ban all synthetic turf fields. This is, indeed, a serious issue.

This fall, after the close of our soccer season, I got a call from the commissioner of fields letting me know that Thomas Jefferson Field on 114th and 1st Avenue was being closed because it tested positive for lead. All other turf fields were tested as well, but tested fine with no alarming lead or other indications. Thomas Jefferson Field, it seems, has sparked concern with the City Council resulting in legislation

From: "Alan E. Scholnick" <scholnick@nyc.rr.com>
Subject: RE: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 9:15:47 PM EST
To: commish@wssl.org

Dana,

I am fully behind your sensible approach and judgment. I think this lead issue is probably overblown. Bottom line: let's not let one rotten apple spoil the barrel! And I doubt even the one field is a real health hazard. My daughter just played there this past fall and she seems as normal as she ever was. I would keep the one field in question open until the funds are available to replace it unless someone tells me that running and falling on it provides a health risk cutaneously. If eating it poses the only health risk, then put the older kids there as I am sure they have outgrown any such temptation. And just to be extra careful, we could suggest showers after the game.

Yours in soccer,

Alan

Please note my new email address: alanscholnick@gmail.com

From: AYSO on behalf of Dana DiPrima [<mailto:inleague@wssl.org>]
Sent: Sunday, February 08, 2009 9:57 AM
To: scholnick@nyc.rr.com
Subject: Proposed Legislation RE: Turf Fields

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

Many of you have written me recently to inquire about proposed city legislation that would ban all synthetic turf fields. This is, indeed, a serious issue.

This fall, after the close of our soccer season, I got a call from the commissioner of fields letting me know that Thomas Jefferson Field on 114th and 1st Avenue was being closed because it tested positive for lead. All other turf fields were tested as well, but tested fine with no alarming lead or other indications. Thomas Jefferson Field, it seems, has sparked concern with the City Council resulting in legislation proposals that would eliminate all turf fields... even the ones that pass health and safety tests. It is important to know that Thomas Jefferson is significantly older than our other turf fields and did not benefit from the new technology that we have incorporated into new projects. Our latest field renovation, on 101st in Riverside Park, uses ecofill, a combination of rubber from recycled sneakers instead of tires and sand.

For your information, the proposed legislation -- three proposals that I know of -- calls for testing and evaluation of surfaces/materials used (sounds like a good idea), signage warning regarding the potentially hot temperatures of artificial surfaces (ok, if you must) and the REMOVAL of all fields that use rubber fill of any kind and all synthetic fields, period (now, that sounds a bit draconian to me). The latter proposed legislation states, verbatim:

From: awleverenz@aol.com
Subject: Re: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 9:26:21 PM EST
To: commish@wssl.org

Dear Dana:

I am a parent whose daughter played for 11 years in the WSSL. Most of those years she had to play on dirt and sand fields, fields with exposed pebbles, fields with poor footing and puddles of water. I've witnessed players slipping and injuring themselves on these fields. No one wants to go back to the days when the Riverside Park "dust bowl" fields discouraged public use and created unsafe footing during and after wet weather. No parent wants their child to miss at least a third of a soccer season because of wet weather canceling games one or two days after a storm passes through, especially during the fall hurricane season.

Athletic fields maintained by the Parks Department are for the benefit of public use. Installing synthetic fields satisfied the need for safe and stable surfaces for kids and adults who play soccer, baseball, and other outdoor sports. The all-weather surface greatly increases a field's usability and availability. These fields eliminate the need for frequent re-seeding, watering, and re-sodding in order to maintain a playable grass surface throughout the year.

If artificial fields pass a health and safety test it does not make sense for the city to waste millions of dollars of money provided by New York families to have these fields built in the first place. Of course, the cushioned substances built into these fields should pass health and safety standards. Rather than rush to remove or place a moratorium on artificial fields, I recommend that the city establishes safety standards for existing and future synthetic fields and work with the appropriate stakeholders to assure these standards are adhered to.

Best regards,
Alan Leverenz
West Side Soccer League Parent Volunteer

-----Original Message-----

From: AYSO on behalf of Dana DiPrima <inleague@wssl.org>
To: awleverenz@aol.com
Sent: Sun, 8 Feb 2009 9:57 am
Subject: Proposed Legislation RE: Turf Fields

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,
Many of you have written me recently to inquire about proposed city legislation that would ban all synthetic turf fields. This is, indeed, a serious issue.
This fall, after the close of our soccer season, I got a call from the commissioner of fields

From: Nick Shearer <nick@deplano.com>
Subject: Re: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 11:13:14 PM EST
To: commish@wssl.org

Dear Dana,

This is, of course, complete BS from the politicians as usual: an over-reaction based on unfounded scaremongering, misinformation and isolated examples of lead levels (in Jersey 2 out of 12 fields tested had slightly higher lead levels than normal - what DOESN'T have lead in NJ? - meaning 10 were fine), as well as insidious lobbying by the sod and grass industry. The field at 114th and 1st where lead was found (Thomas Jefferson), as you say, is an ancient turf field laid before the new kind of surface was perfected.

We all know if this happens, there is scarcely any money to replace these fields - meaning children throughout the five boroughs will lose thousands of venues and places where they can play, whether competitively or otherwise. Of course we want our children to be safe, but we also want them to have physical exercise. Please consider the following when this is discussed tomorrow. I play in leagues with Metro Soccer and Urban Soccer on many of these fields. And, of course, my 5 year old can't wait to start in the Fall with you guys.

- Independent studies have determined synthetic fields safe.
- Rising obesity levels have dogged NYC school children for decades and now the politicians are in effect looking to take their sports programs away.
- As anyone who has played on Randall's Island or other grass field in the City, these fields are often covered in goose feces, which are probably far more toxic than anything in artificial turf.
- Thousands and thousands of NYC children, their parents and voters in New York City play regularly without incident on artificial turf. It's not just soccer, it's baseball, softball, football, lacrosse, ultimate and many other sports and recreational activities.
- FIFA, the world governing body of soccer, has qualified Field Turf brand as an acceptable field surface for major competitions. U-20 international tournaments have been staged on FieldTurf fields.
- The US Soccer Foundation in partnership with Nike and Field Turf have awarded dozens of synthetic fields over the last 10 years to applicants all over the United States. This program continues with Adidas as the benefactor.
- Dozens of New York City High Schools, Colleges and Universities, public and private have installed synthetic fields on their campuses without incident. They join the thousands of similar institutions nationwide who have successfully converted their fields to Field Turf and other synthetic surfaces.
- Municipal parks departments all over the country have converted their fields to synthetic

I've played on all surfaces in this city for 20 years. Since grass is not a viable option in NYC - at least in Manhattan - the new turf has opened up new opportunities for all sports players of all ages. It would be tragic if hysteria and ignorance were to end this. Thanks for listening. Please don't allow our fields to be taken away.

Yours,
Nick Shearer

From: AYSO on behalf of Dana DiPrima [mailto:inleague@wssl.org]
To: nshearer@deplano.com
Sent: Sun, 08 Feb 2009 09:41:35 -0500
Subject: Proposed Legislation RE: Turf Fields

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

From: marthahart.eddy@verizon.net
Subject: **Legislating for Children's Health - making outdoor recreational spaces available in NYC - Monday's Action**
Date: February 8, 2009 11:19:25 PM EST
To: foster@council.nyc.gov
Cc: Rebecca Feuerstein <rebeccaeddy@nyc.rr.com>
Reply-To: marthahart.eddy@verizon.net

Dear Ms. Foster,

As a long time resident of East Harlem (1957 - 1998) I was saddened to see the Jefferson Park field off-limits when I walked through El Barrio from my sister's home on 118th to my father's house on 105th street on Christmas Day. I currently live in Morningside Heights and have a daughter who plays soccer regularly. I am now also concerned about the potential closing of the fields near our home as well.

While I laud the work of the Parks and Recreation Committee to keep our playgrounds and recreational fields safe for children (and adults) I am concerned about the closing of all fields and playgrounds with rubber crumb components or with synthetic turf while research is being done. I see two negative consequences of the currently proposed legislation:

- 1) the loss of perfectly usable fields or playgrounds in neighborhoods throughout NYC possibly for many months (ostensibly only if they need repairs or renovations)
- 2) further delay in prioritizing the repair of fields in neighborhoods like East Harlem that so often get less attention due to potentially competing demands in other neighborhoods with more skilled advocacy or resources.

I am sure that the committee has answered the questions:

What are the studies that make a viable case for the removal of both rubber in-crumb and all synthetic turfs? Have these studies been analyzed carefully for their validity? Are there cases of children suffering in all the described settings that can clearly be attributed to these specific environmental conditions?

My question is have the following additional concerns been addressed before writing the proposed legislation:

What are the outcomes that result from periods of when there is little access to locations for exercise and physical activity? Have all interactive factors been adequately weighed in choosing to shut down fields that have been tested as safe or that have not yet been "repaired" even though we have known that they are unsafe for many months.

Ideally all children's needs will be advocated for in considering how to most quickly upgrade the verified "risk-filled" play areas. Quickly is a key adverb. We live in a litigious world but please be a voice for not letting fear inhibit healthy options for children and choosing to

close what have been viable parks while the process of working out solutions (and impending cut-backs) slowly takes its course. With proper strategizing all needs can be met by finding the right sequence of action and by fighting hard in hard times for the needed fiscal support for opening safe play areas in all neighborhoods. The city can choose to work to bring speed to testing processes. It can also include in its rationale for recreational safety an integration of the results of research from BOTH the domains of environmental safety in recreational areas and behavioral support for pediatric development including the importance of physical activity on the physical, emotional, and cognitive d!

velopment of children across economic classes. Children can not wait 6 - 12 - 18 months, during their pivotal growing years to play. When sports or recreation are not available during key age periods in a growing child's life it can also mean missing out in a developing a skill that will affect "lifelong physical activity." Citizens can read reports daily that speak of the public health consequences of lack of adherence to physical exercise on both children and adults (e.g. the long-term costs of diabetes, heart disease, and even cancer treatment).

As a movement analyst born and raised in El Barrio when swings sets were over concrete strewn with broken glass bottles, I can report from personal history that a lack of rubber has had numerous negative consequences that are similar to shutting down parks and playgrounds. Children dont get to play (parents keep them out) or want to play (their own self-protective instincts set in) or injuries are incurred. It is great that the committee want to improve play areas.

And, we need BOTH safe and open play areas.

Without open or safe play areas motor skills are dampened, obesity increases, and even gender gaps deepen. Studies exist for these phenomenon. We need our playgrounds and fields in good order as fast as possible, in all neighborhoods.

In East Harlem and other similar low-income neighborhoods playgrounds and fields are especially needed given that local children dont have easy access to other recreational activities or areas. Of course we dont want lead poisoning either. We need public places for play brought to code quickly, and for those places that are not known to be seriously harmful to remain open.

If you need any help with developing plans using information from this area of expertise please be in contact with me at the Center for Kinesthetic Education. There are many people in NYC poised to provide data and support.

Thank you your attention to, and advocacy for, this important issue.

Dr. Martha Eddy, CMA, RSMT, Ed.D.
Developmental Movement Therapist
Director
Center for Kinesthetic Education
www.WellnessCKE.net
212 414 2921

From: PAUL SPELLISSY <paulspellissy@msn.com>
Subject: RE: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 10:31:43 AM EST
To: commish@wssl.org

Dear Dana -

I agree with your assessment - this is a 'knee-jerk' over-reaction to an isolated issue. The advantages of all weather turf fields are significant - greater % of time available for use, much lower maintenance cost vs. grass, etc. Turf fields (even ones that use crumb rubber) are routinely used at colleges and in professional sports like (American) football, baseball, etc.

As for fields getting hot during hot weather...well the sand at the beach does too...shall we eliminate sand at Jones Beach?

I agree that the correct response is that fields should be checked to ensure there is no lead or other hazardous materials present, and then allow them to be used.

Given current city budget crisis, removal of existing crumb fields and replacement with grass fields will not happen - the city will just close and fence off the existing fields...period.

Thanks for your efforts.
Regards
Paul Spellissy

Date: Sun, 8 Feb 2009 06:35:45 -0800
From: inleague@wssl.org
To: paulspellissy@msn.com
Subject: Proposed Legislation RE: Turf Fields

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

Many of you have written me recently to inquire about proposed city legislation that would ban all synthetic turf fields. This is, indeed, a serious issue.

This fall, after the close of our soccer season, I got a call from the commissioner of fields letting me know that Thomas Jefferson Field on 114th and 1st Avenue was being closed because it tested positive for lead. All other turf fields were tested as well, but tested fine with no alarming lead or other indications. Thomas Jefferson Field, it seems, has sparked concern with the City Council resulting in legislation proposals that would eliminate all turf fields... even the ones that pass health and safety tests. It is important to know that Thomas Jefferson is significantly older than our other turf fields and did not benefit from the new technology that we have incorporated into new projects. Our latest field renovation, on 101st in Riverside Park, uses ecofill, a combination of rubber from recycled sneakers instead of tires and sand.

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From: Ira Gershenhorn <ira@gershenhorn.com>
Subject: Re: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 10:38:19 AM EST
To: foster@council.nyc.gov
Cc: commish@wssl.org

Hon. Helen Foster
Chair, Committee on Parks & Recreation
250 Broadway, NY NY 10007

Dear Helen Foster,

Dana DiPrima advises me there is pending city legislation to remove existing turf fields and crumb rubber in turf fields.

I had not known about this. I read the NY Times regularly. What's the big secret? Where should I be looking?. I just searched the NY Times online for 'turf' and the latest article was May 15 2008 titled Study Finds No Evidence of Risk in Synthetic Turf. Granted the NY Times doesn't report everything but I feel I am truly blindsided by this.

I think it is IDIOTIC to make blanket statements about turf fields as they all seem to be constructed differently.

And even if studies find potential health problems with particular turf fields then, those fields should be considered for remediation only if a mechanism can be found where such potential issues can be transported into a human body.

The only word for this is BIG PICTURE.

You cannot legislate little bits of human activity and expect they achieve the big picture goals, and this stinks of fiddling.

The result of this legislation is likely a city devoid of playable surfaces. A city of very bored people. Bored people get involved in bad and harmful activities. I guarantee that the result of this legislation will be a rise in crime.

I also guarantee there is NO MONEY to remove the crumb rubber. Is there money set aside in the legislation? We will end up with large fields surrounded by yellow tape and people not belonging to organizations will violate that yellow tape and the legislators will be able to tell their constituents how they protected them from lead and at the end of the day there will be no change.

Choose your poison well. Small unsubstantiated danger from turf fields vs bored, obese, crime-ridden populace, still no less poisoned by lead.

The law of unintended consequences will prevail.

Recently, I told the Riverside Parks Administrator that there was a big problem at the 101st and 107th street fields with car tire noise from the West Side Highway that runs

along the west side of those fields. It is REALLY LOUD. I suggested that even a 4 foot high concrete barrier would deflect much of that noise. It would also do double duty of protecting the pedestrians who walk, bike, run along that highway. If you've ever driven on that highway, you know that there are crazy drivers that cut you off and weave irresponsibly. I was told that the concrete barriers were not available. I was told my idea would not work. I strongly disagree. There was no test. I believe I was just blown off by someone who had already too much work to do.

Why am I telling you this? I am telling you this, because I do not believe you have the interests of the users in mind with whatever legislation you want to pass. You are doing it on behalf of some black and white debt to someone who you think got you elected.

Passing this legislation will not help to keep anyone in office.

Sincerely,

Ira Gershenhorn
320 Riverside Drive
New York NY 10025
Parent of student of Booker T Washington Middle School
Co-Treasurer of Booker T Washington Middle School
Volunteer park tender in Riverside Park
User of Riverside Park

From: Marc Michel <marc.michel@michelcapital.com>
Subject: Re: Proposed Legislation RE: Turf Fields
Date: February 8, 2009 10:43:25 AM EST
To: commish@wssl.org

Dear Dana, thank you for alerting us to this proposed legislation. This is the classic case of good intentions gone bad. Of course, the health department should disallow the use of any sports fields whether synthetic or natural that pose grave health risks to our children. However, to just paint all fields with the same brush simply because they are labeled synthetic would be a huge and devastating mistake. The synthetic fields that have been installed over the last several years on the West Side have been of huge benefit to our kids. New York kids suffer from a lack of fields to begin with relative to kids who grow up outside of city confines where land is abundant. As a result our kids tend to get less exercise and are at greater risk for obesity. In addition, the mental health benefits that accrue to kids as a result of exercise are also well known. As a soccer coach, I attest to this first hand. Hence we need to afford our kids as much of an opportunity to participate in athletics as we can. The benefit of the synthetic fields is that they are usable even in poor weather conditions. Natural grass fields can not be used in rainy conditions because they get too damaged. Hence, play that is scheduled on the natural grass fields gets cancelled far more often than the synthetic fields, thus depriving our kids of that exercise they so critically need.

The city's ban on all synthetic fields without regard for their true health risks is therefore the wrong course of action. I urge the City Council to rethink their position on this.

Sincerely,

Marc H. Michel
450 Park Avenue South
9th Floor
New York, NY
212 794 4474
212 772 3538
marc.michel@michelcapital.com

----- Original Message -----

From: [AYSO on behalf of Dana DiPrima](#)
To: marc.michel@michelcapital.com
Sent: Sunday, February 08, 2009 9:45 AM
Subject: Proposed Legislation RE: Turf Fields

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

Many of you have written me recently to inquire about proposed city legislation that would ban all synthetic turf fields. This is, indeed, a serious issue.

This fall, after the close of our soccer season, I got a call from the commissioner of fields letting me know that Thomas Jefferson Field on 114th and 1st Avenue was being closed because it tested positive for lead. All other turf fields were tested as well, but tested fine with no alarming lead or other indications. Thomas Jefferson Field, it seems, has sparked concern with the City Council resulting in legislation proposals that would eliminate all turf fields... even the ones that pass health and safety tests. It is important to know that Thomas Jefferson is significantly older than our other turf fields and did not benefit from

From: "AJ Willmer" <ajwbusn@ajdj.com>
Subject: [BHUSD] CPSC finds NO dangerous lead levels in synthetic turf fields
Date: July 30, 2008 7:30:49 PM EDT
To: "Kari McVeigh" <kmcveigh@bhusd.k12.ca.us>, "Myra Demeter" <myralsd@aol.com>, "Roderick Wood" <rwood@beverlyhills.org>, "Barry Brucker" <bbrucker@independentink.com>
Cc: "Steve Miller" <smiller@beverlyhills.org>, "Michael Karlin" <mjkarlin@karlinks.com>
▶ 1 Attachment, 29.0 KB

Superintendent McVeigh, President Demeter, Manager Wood, Mayor Brucker:
(cc/ Steve Miller, Michael Karlin)

There has been a fair amount of news and concern recently about the possibility of dangerous lead levels in the pigments of synthetic turf fields. Here is the U.S. Consumer Product Safety Commission (CPSC) findings that were released today indicating that there are NO dangerous lead levels in synthetic turf.

<http://www.cpsc.gov/cpscpub/prereel/prhtml08/08348.html> and I have attached a PDF of the testing protocol and the data.

WASHINGTON, D.C. - The U.S. Consumer Product Safety Commission (CPSC) staff today released its evaluation (pdf) of various synthetic athletic fields. The evaluation concludes that young children are not at risk from exposure to lead in these fields.

CPSC staff evaluation showed that newer fields had no lead or generally had the lowest lead levels. Although small amounts of lead were detected on the surface of some older fields, none of these tested fields released amounts of lead that would be harmful to children.

Lead is present in the pigments of some synthetic turf products to give the turf its various colors. Staff recognizes that some conditions such as age, weathering, exposure to sunlight, and wear and tear might change the amount of lead that could be released from the turf. As turf is used during athletics or play and exposed over time to sunlight, heat and other weather conditions, the surface of the turf may start to become worn and small particles of the lead-containing synthetic grass fibers might be released. The staff considered in the evaluation that particles on a child's hand transferred to his/her mouth would be the most likely route of exposure and determined young children would not be at risk.

Although this evaluation found no harmful lead levels, CPSC staff is asking that voluntary standards be developed for synthetic turf to preclude the use of lead in future products. This action is being taken proactively to address any future production of synthetic turf and to set a standard for any new entrants to the market to follow.

As an overall guideline, CPSC staff recommends young children wash their hands after playing outside, especially before eating.

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NEWS from CPSC

U.S. Consumer Product Safety Commission

Office of Information and Public Affairs

Washington, DC 20207

FOR IMMEDIATE RELEASE

July 30, 2008

Release #08-348

CPSC Hotline: (800) 638-2772

CPSC Media Contacts: (301) 504-7908

CPSC Staff Finds Synthetic Turf Fields OK to Install, OK to Play On

WASHINGTON, D.C. - The U.S. Consumer Product Safety Commission (CPSC) staff today released its [evaluation](#) (pdf) of various synthetic athletic fields. The evaluation concludes that young children are not at risk from exposure to lead in these fields.

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Consumers can also view a [video clip \(transcript\)](#) about lead and synthetic turf. This is in "[streaming video](#)" format.

Send the link for this page to a friend! The U.S. Consumer Product Safety Commission is charged with protecting the public from unreasonable risks of serious injury or death from thousands of types of consumer products under the agency's jurisdiction. The CPSC is committed to protecting consumers and families from products that pose a

fire, electrical, chemical, or mechanical hazard. The CPSC's work to ensure the safety of consumer products - such as toys, cribs, power tools, cigarette lighters, and household chemicals - contributed significantly to the decline in the rate of deaths and injuries associated with consumer products over the past 30 years.

To report a dangerous product or a product-related injury, call CPSC's hotline at (800) 638-2772 or CPSC's teletypewriter at (800) 638-8270, or visit CPSC's web site at www.cpsc.gov/talk.html. To join a CPSC email subscription list, please go to <https://www.cpsc.gov/cpsclist.aspx>. Consumers can obtain this release and recall information at CPSC's Web site at www.cpsc.gov.

CPSC Staff¹ Analysis and Assessment of Synthetic Turf “Grass Blades”

CPSC staff identified synthetic turf products for analysis of total lead content and accessible lead. Staff obtained samples of turf that had been left over after installation or that became available when a field was dismantled. Staff also visited in-service synthetic turf fields, and used portable X-ray Fluorescence (XRF) testing equipment to detect the presence of lead in the product, as well as a portable field wiping apparatus to measure the exposure potential to the lead.

The staff considered that exposure to the lead present in some synthetic turf products could occur if some of the lead gets on children’s hands, perhaps when synthetic grass blades break or become worn and release small particles of lead-containing material. The lead on the children’s hands may then get transferred from their hands to their mouths through normal hand-to-mouth activity during or after playing on the field.

Analytical Methods

Lead Content

Small pieces of synthetic grass blades were dissolved in concentrated nitric acid using a microwave digestion. The digested sample solutions were then analyzed for lead content using inductively coupled plasma atomic emission spectroscopy.

Accessible Lead (Wipe Sampling)

Products found to contain lead were tested for accessibility of the lead; *i.e.*, whether children using the product could be exposed to the lead that is present.

Staff adapted the approach for estimating exposure to lead from contact with lead-containing synthetic turf fields from the approach used to assess children’s exposure to arsenic from playing on playground structures built using chromated copper arsenate (CCA) pressure-treated wood (Appendix A).

The wipe testing methodology developed for testing pressure-treated wood was used to measure transfer of lead from synthetic grass blades, with one modification. Ghost Wipe™ was used in place of the polyester cloth wipe used in the wipe sampling for wood. Ghost Wipe™ is a commercially available wiping material, 15 cm x 15 cm, pre-moistened with deionized water, and sold in individually sealed packets. Company literature indicates that the Ghost Wipe™ meets all ASTM E1792-96E² specifications for sampling materials for lead in surface dust.

The general method involves attaching a Ghost Wipe™ to a 1.1 kg weighted disk, 8 cm in diameter, installed in a device built to provide a standardized and consistent surface wiping. The disk is dragged down a 50-cm length of turf sample for 10 back and forth strokes. The wipe is then removed for analysis.

¹ These comments are those of the CPSC staff, have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

² ASTM Standard E1792-96E, “Standard Specification for Wipe Sampling Materials for Lead in Surface Dust,” ASTM International, West Conshohocken, PA, www.astm.org.

Results

Several of the products obtained by staff contained lead in the synthetic grass with concentrations ranging from 0.09 percent lead by weight to 0.96 percent. The testing showed that lead content varied between synthetic turf installations, and also within a field depending on color.

The data show that wiping of the surface of lead-containing synthetic turf with firm pressure results in transfer of some lead or lead-containing material to the wipe medium (Ghost Wipe™).

Exposure Assessment and Results

If it is assumed that transfer of lead-containing residue from the surface of synthetic turf has similar characteristics to transfer of arsenic-containing residue from wood (Appendix A) (*i.e.*, that the amount of residue collected does not increase infinitely, but plateaus at some point during play), then the amount of lead that might collect on the hands of children as they play on turf fields can be estimated from laboratory studies of synthetic turf.

As discussed in Appendix A, the experimental wipe method using polyester cloths overestimated the amount of residue that might be transferred to a person's bare skin by a factor of between five and 13 times, depending on whether a wet or dry cloth was used. Although the relationship between surface residue removal by a Ghost Wipe™ and bare skin has not been fully characterized, preliminary tests indicate that the Ghost Wipe™ overestimates to a similar degree the transfer of material from the turf surface to bare hands.

The staff believes that dividing the results obtained through use of using Ghost Wipes™ by five is a reasonable approximation of the amount of lead-containing material that may transfer to children's hands.

The exposure assessment described above concerns the accessibility of the lead. Another important point to consider is the bioavailability of the lead, which relates to the amount of lead that is absorbed by the body. The staff assumed, in this case, that the bioavailability of lead from the material that transfers to skin from contact with lead-containing synthetic turf is the same as the bioavailability of lead from food and drink in the epidemiological studies of lead exposure.

The staff's approach, based on the assessment of exposure to arsenic in pressure-treated wood, is that during play, lead-containing residue is transferred to a child's hands and then a portion of that "handload" is transferred to the mouth during the day. The staff practice for assessing whether exposure to a product would result in excessive lead exposure is to assume that about half of the residue that collects on a child's hands ends up in their mouths (*i.e.*, transfer efficiency is 50 percent).

The staff used the wipe-testing data to estimate transfer of lead to children's hands during contact with a synthetic turf surface during play. Each wipe value was divided by five to correct the overestimation of transfer using the Ghost Wipe™, and divided by two to account for the amount of lead that is transferred from the hands to the mouth.

CPSC staff recognizes a level of 10 micrograms of lead per deciliter of blood (10 µg/dL) as a level of concern with respect to lead poisoning. To prevent children from exceeding this level, the staff suggests that chronic ingestion of lead from consumer products should not exceed

15 μg lead/day³. This value was determined from epidemiological studies of ingestion of lead through food and drink (as discussed above with respect to bioavailability).

The results (Table 1) for this set of tested synthetic turf fields show no case in which the estimated exposure for children playing on the field would exceed 15 μg lead/day.

Study Limitations

This assessment is subject to a number of limitations including the accuracy of the wipe sampling method for estimating exposure to lead-containing residue from touching or other contact with the synthetic turf surface; the accuracy of the assumptions about the capacity of bare skin to collect surface residues during a typical play event at a field; and the accuracy of the assumptions related to hand-to-mouth transfer of lead-containing residues. Further, the staff did not make adjustments in its assessment to account for the non-uniformity of lead content of synthetic turf fields; *i.e.*, some fields had striped areas that contained lead that constitute only a small part of the total playing surface of the field that otherwise had no detectable lead levels. Children playing on such fields might have some contact with the lead-containing striped areas, but most of their contact with the surface would be expected to be with the other parts of the turf (not lead-containing). Finally, the bioavailability of lead from synthetic turf may not be the same as it is for the food and drink exposures that were the basis of the dose-response assessment used to determine the staff's recommended 15 μg /day exposure limit for lead.

³ 16 C.F.R. § 1500.230. Codified Guidance Policy for Lead in Consumer Products (63 FR 70648; December 22, 1998).

Appendix A

The staff's previous assessment⁴ of children's exposure to arsenic from playing on playground structures built using chromated copper arsenate (CCA) pressure-treated wood informed the current approach to analysis of synthetic turf surfaces and the assessment of potential exposure to the lead contained in the turf "grass" fibers. Lessons learned from the CCA studies include:

- 1) Development of a treated wood sampling method: A saline-wetted polyester cloth wipe was attached to a 1.1 kg weighted disk, 8 cm in diameter. The disk was dragged down a 50-cm length of wood for 10 back and forth strokes. When compared to results of residue transfer using volunteers with bare hands, the polyester cloths picked up approximately 13 times more residue; the experimental values were multiplied by a conversion factor of 0.076 to get human skin equivalent handloadings. When the polyester cloths were used dry, they picked up, on average, about 5 times more residue than the volunteer's bare hands did.
- 2) Understanding of some of the characteristics of treated wood surface residues: Removal of surface residue arsenic correlated with several experimental design features including the material used to wipe the surface, whether the material was wetted or dry, the amount of force applied during wiping, and the area wiped. A key observation was that the amount of dislodged residue did not necessarily simply increase with changes in method that would likely remove more residue. Rather, the amount of dislodged residue approached a plateau, *i.e.*, it appeared that the transfer of material depended on the capacity of the transfer medium (whether the skin of hands of volunteers or wipes made of cloth or other materials) to collect residue, which was not infinite.
- 3) Understanding of the nature of children's contact with playground structures and potential exposure to surface residues: The data, in conjunction with activity analysis of children playing on playgrounds, led to the conclusion that despite the large variability in children's playground activities and time spent at a playground, their hands would likely collect surface residues from the wood structures they happened to touch fairly quickly in a play session—what the staff termed "maximum handloading". For the exposure and risk analysis, then, the staff assumed that a child's hands would become contaminated with an amount of arsenic as determined by the experimental study of residue transfer. Data from cloth wipes were adjusted for the finding that the cloth wipes always picked up more residue from the wood surfaces than the bare skin of volunteers.

⁴ Briefing Package, Petition to Ban Chromated Copper Arsenate (CCA)-Treated Wood in Playground Equipment (Petition HP 01-3), February 4, 2003.

Table 1. Turf Sample Exposure Results and Health Hazard Evaluation

| Firm | Description | Subsample | Lead content (%) | Wipe Sampling Result (μg) * | Estimated daily ingestion of lead (μg) †† |
|------|---|-----------------|------------------|--|--|
| 1 | Green, installed 1999; removed 2008 | 1 | 0.54 | 65.8 | 6.6 |
| | | 2 | 0.56 | 98.7 | 9.9 |
| | | 3 | 0.55 | 39.9 | 4.0 |
| | | Average | | 68.1 | 6.8 |
| 1 | Green, indoor field; installed 2000; in use | | 0.88 | 14.3 | 1.4 |
| 1 | Green; new, 2008 | 1 | 0.1 | 1.2 | 0.12 |
| | | 2 | 0.09 | 1.2 | 0.12 |
| | | 3 | | 0.9 | 0.09 |
| | | Average | | 1.1 | 0.11 |
| 1 | Green; new, 2008 | 1 | 0.42 | 1.3 | 0.13 |
| | | 2 | 0.47 | 0.4 | 0.04 |
| | | 3 | | 0.4 | 0.04 |
| | | Average | | 0.7 | 0.07 |
| 2 | Green and other colors; installed 2005; in use | | nd | nt | neg |
| 2 | Green; unused sample sent to lab for analysis | | nd | nt | neg |
| 2 | Green; unused sample sent to lab for analysis | | nd | nt | neg |
| 2 | Green; unused sample sent to lab for analysis | | nd | nt | neg |
| 2 | Green; unused sample sent to lab for analysis | | trace | nt | neg |
| 2 | Green; unused sample sent to lab for analysis | | nd | nt | neg |
| 2 | Red; unused sample sent to lab for analysis | | nd | nt | neg |
| 2 | Yellow stripes; field in use | Sideline,1 | 0.53 | 0.9 | 0.09 |
| | | Sideline,2 | | 0.5 | 0.05 |
| | | Midfield | | 2.4 | 0.24 |
| 3 | Green with yellow stripes; installed 2007; in use | Green | nd | nt | neg |
| | | Yellow,18 | 0.96 | 0.7 | 0.07 |
| | | Yellow,19 | | 1.4 | 0.14 |
| | | Yellow,20 | | 0.8 | 0.08 |
| | | Yellow, Average | | 1.0 | 0.1 |
| 4 | Green; white stripes; installed 2004; in use | | nd | nt | neg |

Note: nd = none detected; nt = not tested; neg = negligible

* Amount of lead collected on Ghost Wipe™ during wipe testing; if multiple wipes were conducted on a sample, the result of the first wipe is shown; all values are total lead removed during wipe.

† Laboratory wipe results divided by 5 to account for differences in lead residue removal efficiency of the Ghost Wipe™ and bare skin. The factor of 5 was taken from the staff's CCA studies; a similar trend was found in limited hand sampling of synthetic grass blades. Staff assumes that half of the residue that collects on a child's hands will be transferred to the mouth and ingested. Thus, the estimated daily ingestion of lead is the Ghost Wipe™ result divided by 5 divided by 2.

‡ The estimated daily ingestion of lead is an estimate of exposure for children playing on a synthetic turf field. Each estimate in this analysis may be compared to the 15 µg/day level that CPSC staff suggests not be exceeded in order to prevent young children from exceeding the 10 µg/dL blood lead level of concern.

From: John Graziano <johngraziano@nyc.rr.com>
Subject: RE: Proposed Legislation RE: Turf Fields
Date: February 9, 2009 7:10:39 AM EST
To: commish@wssl.org
Cc: foster@council.nyc.gov

To Whom It May Concern:

Many years ago synthetic turf field manufacturers used lead as a UV stabilizer to keep the green from fading so quickly. This most likely is the source of the high lead levels.

Not all synthetic turf fields are the same. I am a design consultant for playgrounds and do a lot of business in New York City. In addition to this my company is the exclusive representative for DESSO – a Belgium synthetic turf producer. DESSO has never used lead in any of their products and they do use a rubber infill that is free of toxic substances. DESSO is the world's premiere synthetic turf manufacturer – we have over 800 soccer fields around the world and the NFL in America has started to catch on (Steelers, Broncos, Eagles to name a few) with major universities also ordering from our company.

The infill you seek to eliminate has no toxic substance and should be regarded as safe. We use the sand and rubber combination for a reason – athletes need this for their own ability to run, turn, cut and stop on a level field that is as close to natural ground as can be. Turf companies are trying to sell a product that does not require infill but this will not work – if it did DESSO would have led the charge years ago.

The real problem is with the City now allowing my company to do business in the athletic fields – we were approved by the city and we were specified for the Harlem River Field – but a contractor provided an “equal” which, in fact, was anything but an equal. The real reason DESSO is not found in New York City is the price. We are about .30 cents higher in price – and that's the cost for superior quality. Because there is no real oversight in the bidding process, the City rubber stamps whatever the contractor provides in the bid documentation and the “equal” wins the day – at no savings to the taxpayers because the contracts have already been granted. The contract bids for X, find a supplier who can give to him for Y and they pocket the difference.

The City of New York refuses to hold spec and therefore DESSO gets thrown to the curb. The people of this great City deserve better but the contractor's have made it impossible to get quality.

Look at Riverside Park – the fields that are being installed there now – not even one year old, are already failing. I was at Riverside and 107th on Saturday and can see where the seams are breaking – something that would not happen with DESSO. The City is throwing millions of dollars down a drain and my company just shakes our collective heads and we move on. I have the best possible working relationship with the New York City Parks Department. You can call there and speak to the director of budgets and specifications and she will tell you about my reputation for quality and professionalism. But it is the contractors who run the show.

I advise you not to eliminate rubber and sand infill. My own 13 year old son plays with the Manhattan Soccer Club – he started out with AYSO – and he needs a safe field to play on. It's just

too bad he can't play on a DESSO field. Our fields are FIFA approved – World Cup Soccer gets played on DESSO fields. New Yorkers play on products produced in Asia with no quality control and these fields do not last three years.

Best regards,

John Graziano, CPSI
GameTime Playgrounds
Design Consultant
Marturano Recreation Company, Inc.
212-426-2092 p
212-426-4986 f
917-574-8240 c

From: AYSO on behalf of Dana DiPrima [<mailto:inleague@wssl.org>]
Sent: Sunday, February 08, 2009 9:52 AM
To: johngraziano@nyc.rr.com
Subject: Proposed Legislation RE: Turf Fields

The following email was sent by Dana DiPrima via the inLeague system.

Dear Parents,

Many of you have written me recently to inquire about proposed city legislation that would ban all synthetic turf fields. This is, indeed, a serious issue.

This fall, after the close of our soccer season, I got a call from the commissioner of fields letting me know that Thomas Jefferson Field on 114th and 1st Avenue was being closed because it tested positive for lead. All other turf fields were tested as well, but tested fine with no alarming lead or other indications. Thomas Jefferson Field, it seems, has sparked concern with the City Council resulting in legislation proposals that would eliminate all turf fields... even the ones that pass health and safety tests. It is important to know that Thomas Jefferson is significantly older than our other turf fields and did not benefit from the new technology that we have incorporated into new projects. Our latest field renovation, on 101st in Riverside Park, uses ecofill, a combination of rubber from recycled sneakers instead of tires and sand.

For your information, the proposed legislation -- three proposals that I know of -- calls for testing and evaluation of surfaces/materials used (sounds like a good idea), signage warning regarding the potentially hot temperatures of artificial surfaces (ok, if you must) and the REMOVAL of all fields that use rubber fill of any kind and all synthetic fields, period (now, that sounds a bit draconian to me). The latter proposed legislation states, verbatim:

- b. It shall be unlawful to use crumb rubber or crumb rubber infill for any purpose in any park or for any surface intended for use at any time for recreational purposes within the city of New York.
- c. All parks or other surfaces intended for use at any time for recreational purposes within the city of New York that presently contain crumb rubber or crumb rubber infill shall be changed within one year from the

enactment of this legislation to materials that do not contain crumb rubber or crumb rubber infill.
d. For six months following the enactment of this legislation, there shall be no construction or renovation in any park or of any surface intended for use at any time for recreational purposes within the city of New York that utilizes any material made in whole or in part from synthetic or artificial turf.

As a community of concerned parents who want healthy playing surfaces for our children as well as the opportunity to play sports -- organized and otherwise -- on fields that are safe and easy enough to maintain that we do not have to cancel games on a sunny day because it drizzled the night before, I thought you should know.

If you would like to add your two cents, you can send them to me for inclusion in my testimony tomorrow and/or submit them directly to the council member at the email, fax or mail address below.

Hon. Helen Foster
Chair, Committee on Parks & Recreation
250 Broadway
NY NY 10007
Fax: 718-588-7500
Email: foster@council.nyc.gov

Yours in soccer, Dana DiPrima, Commissioner WSSL

This message was sent to:

- All Parents
- All Board Members

Replying to this email: when you press 'reply', it should automatically go to commish@wssl.org and not inleague@wssl.org, but check and be sure. Emails sent to inleague@wssl.org are automatically discarded.

To opt out from receiving emails from AYSO, login to your [Family Profile](#) (<https://www.wssl.org/new/inleague/>) (click on "Family Profile" after you log in). Click on your name to update your account information and select "I do not wish to receive email from AYSO." Please note that you will not receive any emails regarding your children, team assignments, or important updates.

This email was sent to johngraziano@nyc.rr.com.

From: Jeff Horowitz <jeff_horowitz@hotmail.com>
Subject: RE: Proposed Legislation RE: Turf Fields
Date: February 9, 2009 7:25:17 AM EST
To: commish@wssl.org

Hello,

The problem I have is a complete lack of trust in the government and what they tell us. This issue about the fields has been known to many for at least a couple of years and yet all that time nothing was done. Testing did not occur until someone got sick. And now I am supposed to believe only one field was deemed unsafe? I don't believe anything that comes from the city. They could test and interpret tests anyway they want.

I am for banning all fields with the chopped up rubber.

Do you think we know for sure where the rubber on the newer fields comes from? No way. The manufacturers and the city governmental agencies will not tell the truth whenever it suits their purposes with no regard to the health and safety of the kids or adults.

- Jeff

Date: Sun, 8 Feb 2009 07:13:21 -0800
From: inleague@wssl.org
To: jeff_horowitz@hotmail.com
Subject: Proposed Legislation RE: Turf Fields

The following email was sent by Dana DiPrima via the inLeague system.

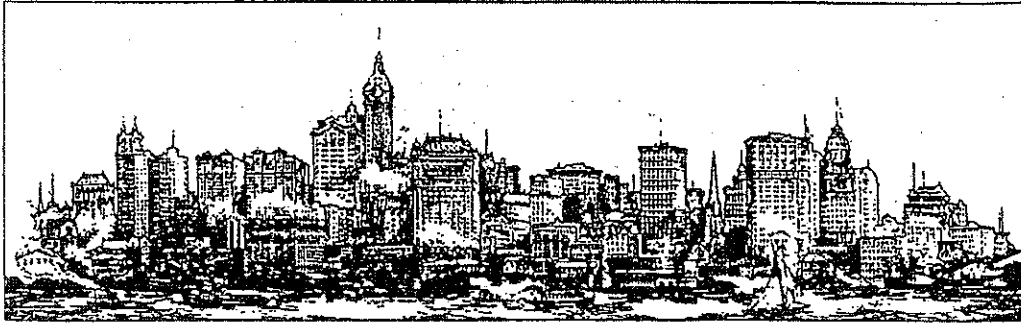
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- c. All parks or other surfaces intended for use at any time for recreational purposes within the city of New York that presently contain crumb rubber or crumb rubber infill shall be changed within one year



THE SOCIETY FOR THE ARCHITECTURE OF THE CITY

Statement of support for Int. No. 739, limiting the use of synthetic turf

City Council Parks and Recreation Committee, February 9, 2009

The Society for the Architecture of the City is an all volunteer historic preservation advocacy group based in Greenwich Village. We are here to thank the sponsors of Int. No. 739, and to support it.

Clearly most important is the health issue. Fake grass has been accused of overheating, tearing skin, and shedding carcinogens. The Parks Department has already studied this issue and come to the wrong conclusions, shuffling the deck to argue that not all the products are the same, and not all critical studies are reliable. Nevertheless, the safety and healthfulness of the product are not established. It is not what any reasonable person would want children playing on today.

Fake grass first came to our attention in connection with a sports field adjoining the landmarked King Manor. In terms of landmarks regulation, the lurid color and strange texture of this product were at war with traditional landscaping, which uses living plants. The Parks Department took the position that it was impossible to maintain a heavily used soccer field without using this product. On a personal note, as a child attending a public school in Ann Arbor, Michigan, I played soccer and baseball on a dirt and gravel sports field. There are alternatives to fake grass, not least, real grass. The destructive policy of eliminating landscaping jobs and punting what should be routine maintenance into the capital budget has gone too far.

An example of this capital budget mania is Parks' plan to landfill the decommissioned Ridgewood Reservoir. The reservoir presently encloses a wild area of woodland, marsh and open water, home to an amazing variety of birds—ducks, woodcocks, warblers. Parks wants to obliterate this historic and natural resource, fill in the basin, bury the handsome 19th century stone walls, and cover it with, yes, fake grass for playing fields.

Stopping the use of fake grass would have health benefits, and make the Parks Department rethink its destructive contracting priorities. New Yorkers deserve real playing fields with natural surfaces.

Christabel Gough, Secretary

February 9, 2009

45 CHRISTOPHER STREET APT. 2E, NEW YORK, N.Y. 10014 (212) 741-2628

Ronald Kopnicki, President • Matt McGhee, Treasurer • Christabel Gough, Secretary

The Society for the Architecture of the City, Inc. publishes the review, *Village Views*



Synthetic Turf Council Testimony

Presented by STC Member Marty Sergi, President of PermaLife Products, LLC

February 9, 2009

I'm excited to be here on behalf of the Synthetic Turf Council, an association which provides the public with objective information and resources about synthetic turf.

My name is Marty Sergi and I am President of PermaLife Products. My company has recycled over 100 million auto and truck tires into hundreds of products used in your car, your home, your kid's school and your local athletic field. I am joined by Stanley Greene, Synthetic Turf Council Board Member and CEO of Sprinturf, a leading builder of safe synthetic turf fields.

Plants that recycle rubber into a wide array of products work under various permits. Here in New York our local plant operates under permits issued by the State of New York Department of Environmental Protection, and by OSHA and the U. S. EPA.

Today there's been a lot of discussion about the crumb rubber infill used in synthetic turf fields. Most synthetic turf sports fields use this resilient material to provide enhanced durability and cushioning to prevent injuries and keep playing surfaces safe for our children and community. From playgrounds to running tracks and sports fields, the crumb rubber pellets have been used for more than ten years with an unblemished record of safety.

Most of us don't think of crumb rubber as something we encounter in our every day lives - but it is. And I'd like to begin by putting into context not only how safe crumb rubber is, but also how often we come in contact with it.

To put things into perspective:

- Crumb rubber is made from recycled auto and truck tires made from styrene butadiene rubber, one of the most widely used polymers in the world today. Introduced in the 1930's, SBR is predominantly used for the production of car and light truck tires, but it has many more uses, including surgical gloves, sanitary products, children's rubber toys, food packaging, and even chewing gum. There has

never been a danger associated with the use of SBR in these products. For years it's been safe to use in our every day lives and it is no different with the SBR used in the crumb rubber found in synthetic turf playing fields.

- Some organizations have published laboratory test results that identify toxins contained in SBR crumb rubber that MIGHT present a human health or environmental risk, if the toxins were somehow able to leach from the rubber, which does not occur in real world testing. Among the most commonly cited toxins are certain polycyclic aromatic hydrocarbons, or PAHs. Did you know that one charcoal-grilled hamburger has more than three times the amount of PAHs, a widespread organic chemical compound, than an artificial turf field? What this means is that you're exposed to a lot more of this naturally occurring substance at your neighbor's barbeque than you are at a local soccer game on a synthetic turf field.

Impact of crumb rubber-based synthetic turf:

- Now that you know how frequently we come in contact with the same kind of rubber used in the crumb rubber in synthetic turf fields, I'd like to share some information on the impact synthetic turf is having on our communities. In New York, it's creating greater opportunities for youth to play outside, participate in sports and be active.
- Synthetic turf playing fields that use crumb rubber also exponentially increase playing and practice time because they can be used daily and in all types of weather, without worry of damage. Synthetic turf can be utilized around 3,000 hours per year with no "rest" required, more than three times that of natural grass, without the need for millions of gallons of water, or thousands of pounds of fertilizers. This is especially beneficial in New York City, considering the city's limited recreational space, an ever-increasing demand for safe sports fields and playgrounds, and the impracticality of restricting usage to allow for the proper maintenance of natural grass fields.

The Facts about the Safety of Crumb Rubber Infilled Synthetic Turf Fields:

We've covered the every day use and benefits of the crumb rubber found in synthetic turf fields. Now I'd like to address the most important issue of all – safety. From Norway to Great Britain and even here in New York, studies of synthetic turf across the globe have validated the safety of crumb rubber.

- The New York City Department of Health and Mental Hygiene released in May of 2008 a 180-page review and assessment of available research and scientific knowledge attesting to the safety of crumb rubber infilled synthetic turf.
- Just last month an independent study conducted by the independent engineering firm Milone & MacBroom concluded that crumb rubber infilled synthetic turf is safe and that human health and the environment are not threatened by the leaching or off-gassing of any toxic chemicals.
- The U.S. Environmental Protection Agency says crumb rubber is safe too. Their position is that the scrap tires used are not a hazardous waste, and they even recommend using crumb material from granulated used tires for playgrounds, running tracks, and sports fields. The use of crumb rubber in playing fields has also provided the opportunity to recycle 25 million used auto tires per year, tires that would otherwise end up in U.S. landfills.

Conclusion:

For 40 years, under EPA oversight and OSHA-regulated manufacturing, not one person has ever reported ill effects related to ANY materials associated with synthetic turf. Crumb rubber has been safely used in synthetic turf sports fields since it was introduced in 1997, and in playgrounds and tracks for much longer.

At a time when federal, state, and local governments are looking for sound investments in infrastructure improvements, a synthetic turf sports field represents an excellent use of public funds – it promotes a healthy lifestyle; it can be installed on short notice; it uses local labor; and it creates a highly visible benefit for the community or public school. In short, a synthetic turf sports field is good economics and good politics.

If you would like to review any of the current, credible, independent studies available on this topic, or resource materials the Synthetic Turf Council has developed for the general public, please visit our website at: www.syntheticurfCouncil.org. In addition to this testimony, an STC position paper will also be submitted for the record.

We urge you, as the voice of reason, to consider these important facts. The Synthetic Turf Council is open and willing to help the committee create policy that will allow New York City residents to enjoy a safe and productive playing environment. Thank you for your time.



Synthetic Turf: Research Verifies Numerous Usage Benefits and Minimal Health & Environmental Risks

These days, synthetic turf seems to be everywhere. It helped the Tampa Bay Rays reach the World Series, empowered the Barrow Whalers to become the first Arctic high school football team in northern Alaska and provides water-saving landscapes for places ranging from Disneyland to the Wynn Hotel. The escalating need for durable fields that accommodate multiple sports teams, coupled with increasing maintenance, water usage costs and climatic shifts, have prompted a rising number of schools and parks to turn to synthetic turf to balance their program needs. Today's synthetic turf is designed to simulate the experience of practicing and playing on a grass-like surface year round. Demand has grown to the point where over 1,000 multi-use synthetic turf sports fields are installed annually in North American schools, colleges, parks and professional sports stadiums. Almost half of all NFL teams currently play their games on synthetic turf, and it has been approved for World Cup soccer matches.

The Issue

As the popularity of synthetic turf escalates, so does scrutiny about its usage. Insightful and responsible questions are being asked regarding synthetic turf's potential negative impact on the environment and health of its users. The STC acknowledges the concerns of parents, school boards, athletic directors, local officials and environmental and regulatory groups in this regard. As the industry's trade organization, it is our responsibility to address these issues in an unbiased and judicious manner, referring to the large amount of science available.

In July 2008, a U.S. Consumer Product Safety Commission staff report approved the use of synthetic turf by children and people of all ages. Released in early 2009, an independent, year-long study conducted by environmental engineering firm Milone & MacBroom focused on the water quality, air quality, and temperature of three scholastic synthetic turf athletic fields infilled with crumb rubber and silica sand in Connecticut. Addressing water quality from the runoff that passes through the synthetic turf, the surface temperature of the turf, and the air quality on and surrounding the synthetic turf, they concluded that the fields were safe.

During May 2008, the New York City Department of Health and Mental Hygiene released a 180-page review and assessment of available research and scientific knowledge attesting to the safety of crumb rubber infilled synthetic turf. Just two months later, the Rubber Manufacturers Association released a comprehensive review of the exposure to recycled tire rubber found at playgrounds and synthetic turf fields. Conducted by an independent environmental consulting organization, it concluded that "no adverse human health or ecological health effects are likely to result from these beneficial reuses of tire materials."

These findings are the latest in the significant library of independent, credible research about synthetic turf that has been conducted worldwide, and is ongoing. Reputable governmental bodies and scientists in the United States, Norway, Sweden, Canada, Great Britain, New Jersey, California and Connecticut, international sports organizations such as FIFA (the international governing body on soccer), and trade institutes have examined the health and environmental aspects of synthetic turf. These exhaustive efforts have concluded that there is every reason to use synthetic turf while perceived or proposed environmental and health problems have a negligible impact.

Environmental Advantages of Synthetic Turf

The environmental impact of synthetic turf is significant. Benefits include substantially decreased water usage, the essential elimination of chemical treatments, reduced man hours and power equipment operations, which are all needed to maintain a grass field. In fact, it is common for grass sports fields to require a minimum of 15,000 gallons of irrigation water per week during growing season and thousands of pounds of fertilizers and pesticides annually. Assuming a 33 week growing season, the installation of over 1,000 new synthetic turf fields last year conserved an estimated 500 million gallons of water and reduced the use of fertilizers by well over 1.25 million pounds. With approximately 4,500 synthetic turf fields currently in use, the total amount of water saved in 2008 exceeded 2.2 billion gallons - enough water to supply the average home for 75 years.

Crumb used tire rubber has been safely utilized as a popular infill option in synthetic turf sports fields since it was introduced in 1997, and in playgrounds and tracks for much longer. The U.S. EPA's position is that scrap tires are not a hazardous waste, and recommends using crumb material from granulated used tires for playgrounds, running tracks, and sports fields. This decree has afforded the opportunity to recycle 25 million used auto tires per year, tires that would otherwise end up in U.S. landfills.

User Benefits of Synthetic Turf

Increasing demand for higher quality playing surfaces and intense competition for field accessibility have given rise to a new generation of synthetic turf systems that replicate the look and feel of manicured natural grass. Synthetic turf is supplanting its grass counterpart in record numbers because of the numerous benefits it affords, including: exponentially increased playing time, as synthetic turf can be used daily and in all types of weather without worry of damage; improved playability, as synthetic turf fields remain uniform and consistent season after season; increased safety, because the fields are infilled with resilient materials that provide a high level of impact attenuation; reduced maintenance costs; and environmental friendliness in terms of origin, application, use, disposal, sustainability and resource conservation. In addition, while turf grass managers recommend against using a natural field for more than 20 – 24 hours per week or 680 to 816 hours per year for a three season window, synthetic turf can be utilized around 3,000 hours per year with no "rest" required.

STC Position

At the STC, we believe that reliable scientific data should be the foundation of any discussion regarding synthetic turf's safety and utility. After reviewing the available research from a

diverse group of third party experts, our organization is confident that the benefits of synthetic turf to players, schools, communities and the environment are documented and substantially outweigh any potential, minimal risks.

Claims of toxicity are generally based on extreme laboratory testing such as the use of solvents and high temperatures to generate pollutants. Rarely replicating actual field conditions, this laboratory work does not represent realistic material characteristics. More often than not, even with laboratory testing, results in levels of pollutants are below existing background levels within the environment. Given these facts, the environmental concerns have been deemed insignificant by third-party experts. This position is consistent with recommendations of regulating agencies and organizations, such as the U.S. CPSC, U.S. EPA and FIFA, that sports fields is an acceptable use for recycled SBR tire rubber.

Individuals need to weigh the facts themselves to determine if synthetic turf best meets their needs. A collection of unfiltered, credible studies conducted by experts worldwide have been posted on our Web site (www.syntheticurfCouncil.org) for review. In addition, we have launched a Public Outreach & Education Campaign to provide answers to commonly asked questions, as well as educational materials and position papers.

About the Synthetic Turf Council

Based in Atlanta, the Synthetic Turf Council was founded in 2003 to promote the industry and to assist buyers and end users with the selection, use and maintenance of synthetic turf systems in sports field, golf, municipal parks, airports, landscape and residential applications. The organization is also a resource for current, credible, and independent research on the safety and environmental impact of synthetic turf. Membership includes builders, landscape architects, testing labs, maintenance providers, manufacturers, suppliers, installation contractors, infill material suppliers and other specialty service companies. For more information, visit www.syntheticurfCouncil.org.

Anne & Richard Casson Statement
February 9, 2009

Good morning. My name is Richard Casson and I am a father of 3 children – Margaret, age 7, John, age 5, and William Casson, age 3. In May 2007, William, who was 18 months old, suffered 2nd degree burns to his feet on an 84 degree day at Carl Schurz Park on the Upper East Side. I support the Intro bill and Resolution bill ____ regarding playground safety because the use of black vulcanized rubber mats as a safety surface has no place in City playgrounds.

My son was playing in the sandbox, kicked off his sneakers, climbed out, and called for his mother, Anne, to chase him. My wife grabbed his shoes and gave chase. He ran across concrete, asphalt, and then onto the black vulcanized rubber mats. Within 5 seconds of stepping on the mats, the bottoms of his feet were seared and he screamed in pain. The resulting 2nd degree burns put him in the New York Presbyterian burn unit for 4 days.

During our time there, we learned that about 6 children each summer are admitted to that particular burn unit for burns to the feet and hands from these mats. We first thought, “How could the City not know about this hazard with at least 6 cases per summer.” Then we thought, “Maybe the City is unaware, because they would obviously rectify the problem or at least warn parents about the risk if they did know.”

Despite numerous requests, including a June 7, 2007, letter to Mayor Michael Bloomberg with copies to Parks Commissioner Adrian Benepe and other City Officials, the City refused to speak with us about the burn dangers these mats pose. Instead, they claimed that responsible adults would never let children be without shoes. Their logic that responsible adult supervision would prevent these burns must also mean there is no need for window guards in buildings or child safety caps on medicine.

The City defends itself by saying common sense tells you that surfaces get hot in the summer. However, common sense does not tell you that black vulcanized rubber mats can be 40 degrees hotter than the surrounding asphalt and playground equipment. The City has known for years that children suffer severe burns on these black vulcanized rubber mats, even holding a City Council hearing about them on October 24, 2005. During this hearing, Bill Castro, the Manhattan Borough Commissioner of the NYC Department of Parks and Recreation stated, “I know the Council is concerned with the performance of safety surface during the

hot summer, in particular the possibility that children could burn their feet. On a warm summer day, black asphalt, obviously is used in many of our streets of course and playgrounds, is hotter than the surface temperature of our rubber safety surfacing. He also testified that "Now we've started to post signs that remind people to have footwear on. Not all of our signs say that but we've started to do that." We now know that both of these statements are totally false. If the City Council had not negligently failed to follow through with their recommendations from that hearing, William would not have been burned. Many parks today have signs that state no bare feet. Others have computer generated signs stating that footwear must be worn. However, signs advocating no bare feet and footwear will never help prevent the burns to toddlers' hands. I have never seen an official sign warning of the extreme heat and burn dangers of the safety surface.

The Mayor states the mats are not dangerous. Our pictures tell a different story. A surface that heats to 167 degrees and burns toddlers feet and hands in under 5 seconds is dangerous and has no place in City playgrounds. If these black rubber mats were in our backyard and a neighborhood child suffered 2nd degree burns, we would immediately replace them with another safety surface.

In our letter to Mayor Bloomberg, we stated "Our hope is that William will be the last child burned by these dangerous mats in New York City parks." Unfortunately we have thus far failed in our efforts. We know of at least 8 children who have been severely burned by these mats last summer. For the safety of our children, the City Council must immediately enact legislation to place permanent, specific signs warning of the burn dangers, begin replacing these mats with a lighter colored safety surface that does not reach extreme temperatures, and temperature test all playground equipment and safety surfaces.

Thank you for listening to our story about and our family's, painful experience, and for your immediate attention to this most serious safety issue for our City's children.

Anne and Richard Casson

Statement

2-9-09

page 2/2

Testimony on New York City Council
Synthetic Turf Bills 739 and 918.
William Crain, The City College of New York

For three years, I have been conducting research, in collaboration with Dr. Jim Zhang at Rutgers, on possible toxicants in synthetic turf. Our study on lead and other chemicals in synthetic turf in the December issue of the *Journal of Exposure Science and Environmental Epidemiology* was the first peer-reviewed study (and the only such study to date). (The abstract is attached).

Our study performed simulation of the digestive process to see what would happen if lead in the rubber granules and plastic (polyethylene) fibers of new generation synthetic turf were ingested. The results revealed that substantial portions of the lead are likely to be absorbed into the body.

Lead has consistently been found in the rubber granules. Plastic (polyethylene) grass fibers sometimes contain lead, too. (1) True, the concentrations are often low, but medical researchers have concluded that any lead at all can cause neurocognitive damage to children (and, for instance, produce IQ loss). (2) So our finding that lead in the granules can be absorbed into the body if ingested is important. Because young children are the most vulnerable to toxicants, and because they tend to put everything in their mouths, the city should stop letting children under the age of 6 years onto the fields.

Our research has found that other potential toxicants in the fields include polycyclic aromatic hydrocarbons and high levels of zinc. Other investigators have found other risks. We need to examine not just ingestion, but other exposure routes—including inhalation and skin contact. Researchers are only just beginning to investigate all the potential toxicants and exposure routes.

Until more is known, a moratorium on new installations is a very modest step. Wherever possible, the fields with rubber granules should be removed and replaced with natural grass.

In a better world, the safety of the fields would have been studied before installations. Now we're in the terrible position of assessing their safety after over 100 have been installed. This is a public health nightmare. The least our government can do is begin to act with new precaution.

As a final statement, I would like to make a plea on behalf of the natural world. Children today grow up in increasingly sterile, artificial environments. They need contact with nature. It calms them down and helps their concentration. (3) Birds and other wildlife also need natural soil and vegetation; they need it to survive.

Let's get over the idea that synthetic inventions are superior to nature. Let's take a stand in defense of what lives and grows. We've paved over enough of this city with artificial surfaces. We need to stop smothering the earth with synthetic surfaces and protect the little nature that is left. Let's be stewards of the earth in our care..

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Abstract

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www.nature.com/jes

Hazardous chemicals in synthetic turf materials and their bioaccessibility in digestive fluids

JUNFENG (JIM) ZHANG^a, IN-KYU HAN^{a,b}, LIN ZHANG^a AND WILLIAM CRAIN^c

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Many synthetic turf fields consist of not only artificial grass but also rubber granules that are used as infill. The public concerns about toxic chemicals possibly contained in either artificial (polyethylene) grass fibers or rubber granules have been escalating but are based on very limited information available to date. The aim of this research was to obtain data that will help assess potential health risks associated with chemical exposure. In this small-scale study, we collected seven samples of rubber granules and one sample of artificial grass fiber from synthetic turf fields at different ages of the fields. We analyzed these samples to determine the contents (maximum concentrations) of polycyclic aromatic hydrocarbons (PAHs) and several metals (Zn, Cr, As, Cd, and Pb). We also analyzed these samples to determine their bioaccessible fractions of PAHs and metals in synthetic digestive fluids including saliva, gastric fluid, and intestinal fluid through a laboratory simulation technique. Our findings include: (1) rubber granules often, especially when the synthetic turf fields were newer, contained PAHs at levels above health-based soil standards. The levels of PAHs generally appear to decline as the field ages. However, the decay trend may be complicated by adding new rubber granules to compensate for the loss of the material. (2) PAHs contained in rubber granules had zero or near-zero bioaccessibility in the synthetic digestive fluids. (3) The zinc contents were found to far exceed the soil limit. (4) Except one sample with a moderate lead content of 53 p.p.m., the other samples had relatively low concentrations of lead (3.12–5.76 p.p.m.), according to soil standards. However, 24.7–44.2% of the lead in the rubber granules was bioaccessible in the synthetic gastric fluid. (5) The artificial grass fiber sample showed a chromium content of 3.93 p.p.m., and 34.6% and 54.0% bioaccessibility of lead in the synthetic gastric and intestinal fluids, respectively. *Journal of Exposure Science and Environmental Epidemiology* (2008) 18, 600–607; doi:10.1038/jes.2008.55; published online 27 August 2008

Keywords: synthetic turf, PAHs, lead, heavy metals, bioaccessibility.

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HARLEM RBI
PLAY • LEARN • GROW

Vincent M. Coleman – Harlem RBI

Good morning. My name is Vince Coleman and I am the Director of Baseball and Softball Programs at Harlem RBI. I would first like to thank Chairperson Foster and the members of the Committee for allowing me to testify here today.

The dream of Harlem RBI began in 1991, when a group of volunteers transformed an abandoned, garbage-strewn lot in the middle of East Harlem into two magnificent baseball diamonds for the children of the neighborhood. Harlem RBI's programs expanded quickly and outgrew this limited space in no time. Without the use of Department of Parks and Recreation baseball and softball fields, we would not be able to provide 700 boys and girls yearly with the opportunity to **Play, Learn and Grow** using the power of teams to **Coach, Teach, and Inspire**.

Several of the fields we use are turf fields, which have many benefits that are passed along to groups like us who use them. These fields drain water much faster than natural grass fields. This means that the fields are available for play more quickly than natural grass fields, allowing our youth to get back to the game they love – the game that teaches them the importance of teamwork, sportsmanship, and physical fitness – that much faster.

Turf fields are also much less costly to maintain. I know because Harlem RBI's own "Field of Dreams" on East 100th Street is a natural grass field. Its upkeep is extremely expensive and time-consuming, requiring a significant investment of staff, equipment, and labor. Don't get me wrong: we love having a natural grass field of our own, but the costs are significant and the work is never ending. If we had to take care of more than one field, we would not be able to afford much of the other good work that we do. By contrast, turf fields require much less maintenance and save the city significant amounts of money, and we know how important that fact is, especially important during this time of fiscal crisis.

The current budget cuts that are being made throughout New York City will be felt most strongly by the neediest and most vulnerable New Yorkers, many of whom live in the community we serve. Asking New Yorkers to spend millions of dollars on the conversion of turf fields at this time just does not feel right to us, especially as we are faced with cuts to existing revenue streams from agencies like the Department of Youth and Community Development that support much of Harlem RBI's work off the field of play.

Finally, it is worth noting that turf fields are often much safer than their natural grass counterparts. While Harlem RBI's Field of Dreams is pristine, many other natural grass fields around the city that do not have the benefit of significant maintenance budgets have rocks, glass and water that can cause injuries. While excess heat on turf fields has been raised as an issue of concern, I can report that no Harlem RBI youth has ever had a heat-related injury while playing on a turf field. If we felt that heat was a health hazard, we would not let our youth play on these fields. Maintaining a safe place for our youth to play baseball and softball is an important part of the Harlem RBI mission – as I am sure it is for all youth sports organizations in New York City – and turf fields allow us to successfully fulfill this portion of our mandate.

In summary, Harlem RBI has had a positive experience with the city's turf fields and supports their continued use.

Thank you.

**** PLEASE SEND THIS LETTER!!!! **** Stop Artificial Turf!****

Mayor Michael Bloomberg
City Hall
New York, NY 10007

Ban Toxic Turf



Dear Mayor Bloomberg,

This letter is to draw your attention to the environmental and health hazards of artificial turf.

There are an enormous array of potential environmental and public health impacts of using artificial turf in New York City parks. Unfortunately, despite strong public support for local environmental policy initiatives, artificial turf continues to replace natural grass playing fields, moving New York in the opposite direction of becoming a sustainable PlaNYC 2030 city. Please oppose further installation of artificial turf until a comprehensive study is conducted that addresses the environmental and public health concerns.

Top among these concerns is the fact that artificial turf exacerbates the City's combined sewer overflow (CSO) problems. The low water retention rate of artificial turf, which maximizes the recreational potential of such fields, is also a stormwater nightmare. Water glides off of these surfaces with ease and either adds to the City's already overloaded sewer system, or, in the case of waterfront parks, may simply wash directly into our rivers and into New York Harbor.

Also, in contrast to natural playing surfaces such as grass, synthetic fields not only increase run-off, but this run-off is potentially toxic, as it contains rubber tire crumbs from the fields, which are comprised of polycyclic aromatic hydrocarbons (PAHs), a group of chemicals that includes compounds classified as known or probable human carcinogens. See: http://riverkeeper.org/campaign.php/pollution/we_are_doing Artificial turf is also known to contribute to an increase in serious sports injuries.

As you know, Assemblymember Steven Englebright announced his introduction of a new bill (Assembly 9503) that would prevent further installation of synthetic or artificial turf until the NYS Departments of Health and Environmental Conservation complete a study of the potential adverse environmental and public health impacts of this material, and require that any proposed installation of artificial turf should be subject to scrutiny of State and City Environmental Quality Review laws. The cumulative effect of the installation of over a hundred of these fields citywide in a short period of time certainly warrants proper review.

Mr. Mayor, please mandate a moratorium on the development and installation of artificial turf fields until the Parks Department, working with other agencies and independent consultants as needed, has conducted a comprehensive study on the environmental and public health effects of artificial turf. In addition, explore methods to convert synthetic fields back to natural grass fields.

Please reply in writing with an update of your action steps on this issue.

Sincerely,

Name: _____

Address: _____

_____ Email: _____

**** Thank you for your time and attention! ***

Casson, Anne R./Pediatrics

From: Geoffrey Croft [gmcroft@verizon.net]
Sent: Sunday, February 08, 2009 11:50 PM
To: Casson, Anne R./Pediatrics; Richard P. Casson; Anne Regan Casson
Subject: Statement of Reyhan Mehran

Statement of Reyhan Mehran

February 9, 2009 - New York City Council

Good morning, my name is Reyhan Mehran and I am the mother of two children, ages three and five. I support the Introductions and Resolution regarding playground safety. My son Kian, was just 14 months old when he was severely burned on a black rubber mat in a Brooklyn playground in 2004. No parent should ever have to see their child suffer days in a burn center because they touched a material in a playground for a couple of seconds.

Products that reach extremely high temperatures on normal sunny days have no place in our City's playgrounds. Maximum contact temperature standards must be promulgated and testing required for all materials installed in outdoor playgrounds where they can be exposed to direct sunlight. I was stunned to learn that such requirements, which exist for products that adults may be exposed to in work settings, do not exist for products that children are exposed to in parks and playgrounds. My family has spent over four years trying to persuade the City to make simple changes to protect the most vulnerable users of our City's parks and playgrounds. Families of children who were burned in the years prior to my son's injuries have been working at this task even longer.

After all these years, we are all still unable to understand why the Parks Department would not immediately test and replace materials that they know is severely burning children in playgrounds every single summer with one of the many perfectly acceptable available alternatives. To this day, parents, grandparents, and caregivers have no idea that some surfaces in New York City's playgrounds, specifically certain black rubber tile mats, get hot enough to endanger children. Who would think that a black rubber safety mat or a ramp installed in a children's playground would get hot enough to cause second or third degree burns after a few seconds of contact? There is no excuse; these materials should be removed and alternatives must be used.

Until hazardous materials are replaced, we support an interim measure to immediately install adequate signage that clearly indicates to caregivers which surfaces are of concern. Almost no park user has the training needed to distinguish a safe mat from one that has the potential to inflict severe burns to exposed skin. We oppose inadequate or misleading signage which provides park users with a false sense of security. Signs need to be clear and legible and placed in close proximity to the play equipment. Signs should be placed adjacent to specific equipment that are known to be hazardous since many playgrounds include a mixture of both safe and unsafe playground equipment. Signage needs to specify that play equipment, including mats are of concern when exposed to direct sunlight and that this hazard is not limited to hot days. Fact sheets should be available which provide more information on the hazard at the playgrounds known to include dangerous surfaces. Signs reminding park users to wear shoes are woefully inadequate. Tiny hands, faces, knees and arms of infants and toddlers are just as susceptible to second and third degree burns as are feet.

Our family and the many families that have pursued this cause before us continue to be frustrated by the City's inaction. Although the City had been notified of similar skin burns on black rubber mats two summers before our son was injured, the families of children burned the following year were told by the City that they had no prior knowledge of the hazards of the mats. I provided testimony on Kian's injuries at a City Council oversight hearing on the heat dangers of black rubber playground mats in October 2005, one year after he was hospitalized. To our knowledge, no follow up from that hearing ever occurred.

The Mayor and park commissioner's insensitive response to our efforts last summer to warn the public of severe heat dangers in playgrounds has been eye opening. We have been talking about gruesome injuries sustained by infants and toddlers who touched a playground surface for only a few seconds. These are injuries which are entirely preventable. The burns on the hands and feet of infants, toddlers, or disabled children are seen by hospital staff every summer in New York City yet the Mayor continues to respond by mocking parents, telling them that "if the slide's hot, don't sit on it," or the parks commissioner's "simple solution" to avoid burns is to wear shoes. They are either grossly misinformed or extraordinarily insensitive. The mats we are referring to for instance get far hotter than the adjacent asphalt or metal slides and can reach extreme temperatures on average sunny days even when the air temperature is comfortable.

Contrary to the Mayor and commissioner's implications, common sense would not lead anyone to think that a black rubber mat could get hot enough to cause severe contact burns. It is common sense however that products should first be tested before our children are exposed to such dangers. Common sense should also lead the City to immediately begin to remove hazardous materials. Both the City the State must add temperature testing to the required safety standards for all equipment installed in playgrounds. We are therefore pleased to see the proposed Introductions and Resolution relating to installing adequate signage and requiring the testing of all equipment in playgrounds for heat dangers before they are installed.

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Statement of

JONATHAN LEVY

Director, of State and Local Programs

Institute of Scrap Recycling Industries

Washington, D.C.

Before the

New York City Council

Committee on Parks and Recreation

February 9, 2009

Chairwoman Foster and Members of the Committee. Good Afternoon. My name is Jonathan Levy and I am the Director of State and Local Programs for the Institute of Scrap Recycling Industries.

Introduction

ISRI is the world's largest trade association of recyclers with 1,600 member companies who process, broker, and industrially consume scrap commodities, including metals, paper, plastics, glass, rubber, textiles and electronics. For more than a quarter century, the tire recycling industry has explored innovative ways to use recycled tires as a raw material in the manufacture of new products. These innovations have turned what might have become a waste into specification grade recyclable commodities. Scrap tire recycling is a sophisticated, capital-intensive industry and the first link in the manufacturing supply chain. Tire recyclers process end-of-life tires and turn them into a specification grade feedstock for use in the manufacture of a variety of goods. Tire recycling is also an environmentally friendly activity that reduces greenhouse gas emissions and conserves natural resources.

ISRI is concerned that the proposed legislation, Intro. No. 739, may have an adverse impact on tire recycling since this legislation would negatively affect the activities of scrap tire recyclers, hinder environmental protection and cause difficulties for the proper management of scrap tires.

Health Concerns Surrounding Crumb Rubber Are Unfounded

Crumb rubber is a resilient material that is used in a wide array of products. From molded products such as brake pads, rubber mats and speed bumps to playground surfaces and synthetic turf fields, crumb rubber has found a niche that many other materials have difficulty in filling. The difference between crumb rubber and crumb rubber infill is the size of the material. Crumb rubber used in molded products is generally the size and consistency of fine sand or flour. This material requires the use of industrial machinery to press and shape the crumb rubber (along with other binders and materials) to make the desired shape needed for the application. Crumb rubber infill is more coarse in consistency and is used as the layer that holds the “blades” of grass upright. It also serves as the under layer that provides the stability and cushion that is felt when stepping on a turf field. It is important that the City Council realize this difference. Using the terms interchangeably can have unintended consequences.

The rationale to prohibit the use of crumb rubber or crumb rubber infill for any purpose in any park or for any surface intended for recreational purposes within the city of New York on the basis of negative health impacts is misplaced. All, save one, of the studies ISRI is aware of suggest that crumb rubber poses little risk to human health.

Indeed, a study released by the New York City Department of Health and Mental Hygiene (NYC Health Study) illustrates this point:

“Eleven human health risk assessments were identified that evaluated exposure to the constituents in crumb rubber. Although each risk assessment was conducted using distinct assumptions...all had a similar conclusion: exposure to COPCs¹ from crumb rubber may occur, however the degree of exposure is likely to be small through ingestion, dermal or inhalation to increase the risk for any health effect.”²

Further, in October of 2007, the Connecticut Department of Public Health stated that based on the current evidence, a public health risk appears unlikely³. This study goes on to state that their review *did not find any reason to stop installation of these fields*⁴. Other reports from as far away as

¹ COPCs – Chemicals of Potential Concern

² *A Review of the Potential Health And Safety Risks From Synthetic Turf Fields Containing Crumb Rubber Infill* (New York: New York City Department of Health and Mental Hygiene, 2008), ES-3.

³ *Fact Sheet Artificial Turf Fields: Health Questions* (Connecticut Department of Public Health Environmental & Occupational Health Assessment Program, 2007), 2.

⁴ Ibid.

Norway⁵ have come to similar conclusions: that crumb rubber used in synthetic turf applications do not pose a health risk.

Aside from the chemical composition of crumb rubber, ISRI is aware of concerns that have been raised regarding the potential heat build-up that may occur on a field that uses crumb rubber infill on days when temperatures may exceed 90°F. While we agree that this issue ought to be considered, banning the use of turf that utilizes crumb rubber is not the solution. The more sustainable solution is to design fields to mitigate heat generated on excessively hot days. A report released by the consulting firm Milone & MacBroom⁶ has stated that significant cooling could be achieved if water in quantities as little as one ounce per square foot was applied. The very same report indicated that the crumb rubber infill was 16°F cooler than the fibers or “blades” of grass. Additionally, the New York City Health study recommended that fields be landscaped properly to address the heat issue⁷. For example, fields should provide shady areas and access to drinking water.

Developing End-Use Markets for Crumb Rubber Is Essential for a Sustainable Tire Recycling Market.

In today's economy, synthetic turf made from crumb rubber provides a growing market for tire recyclers, which brings confidence to the market and thus furthers industry investment. New York City currently operates 89 synthetic turf fields and countless playgrounds that have crumb rubber surfaces. Due to the vast number of parks, playgrounds and other recreational facilities the city operates, it is a major consumer of crumb rubber. By generating a demand for crumb rubber, the City is helping to strengthen markets for recyclable tires and support an economically sustainable model for tire recycling while at the same time providing an environmentally suitable use for crumb rubber.

The blanket prohibition on the use of crumb rubber in Intro. No. 739 is so sweeping in its scope, it will likely have unintended consequences should the legislation be enacted. The legislation would require the City to remove every playground surface that utilizes crumb rubber. It would require the removal of every molded product utilizing crumb rubber in a City park. It would also require every one of the City's synthetic turf fields to be removed. If New York City is serious about promoting responsible tire recycling, and we believe it is, then, with all due respect, it is counterintuitive to promote legislation that would reduce demand for crumb rubber and its associated products without any proof that there is a health risk. For example, on its website, the City encourages its citizens to recycle tires and counsels its citizens on the proper way to do this.

It is important to note that every day thousands of New Yorkers trade in their end-of-life tires for new ones. In fact, it is estimated that New York State generates 20.7 million scrap tires every year. On a more local level, New York City generates approximately 5 million scrap tires annually. Without markets that generate a sufficient demand for recycled rubber the options for specification

⁵ *Potential health and environmental effects linked to artificial turf systems – final report* (Norwegian Building Research Institute, 2004), 16.

⁶ *Evaluation of the Environmental Effects of Synthetic Turf Athletic Fields* (Milone & MacBroom, 2008), 18.

⁷ *A Review of the Potential Health And Safety Risks From Synthetic Turf Fields Containing Crumb Rubber Infill* (New York: New York City Department of Health and Mental Hygiene, 2008), ES-5

grade commodity materials derived from processing tires are limited. Should the ban on crumb rubber be enacted, it would impact the way tire dealers and others that collect scrap tires throughout the city manage this resource. Without a destination, the scrap tire would sit in a mechanic's garage, a tire dealer's store, a scrap tire recycling facility or worst of all, and most likely, in an illegal tire pile where it would pose health risks as well as the risk of fire.

Without key markets for crumb rubber, the ability to sustain end use markets diminishes. In the alternative, without responsible recycling options, tires could be directed to less sustainable options:

- 1) Used as Tire Derived Fuel (TDF) for energy recovery;
- 2) Sent to landfills;
- 3) Discarded along roads, backyards and other places.

ISRI does not consider burning tires to be recycling. While burning for energy recovery may be a beneficial reuse of that material, the best option is to recycle it responsibly. If option three were selected, we would be taking a huge step backward to the days when unsightly tire piles dotted the landscape. That will be accompanied by the fire and health risks discussed above. Option two is currently unavailable as §27-1911 of the New York State Environmental Conservation Law currently prohibits tires to be disposed of in a landfill.

Unquestionably, the highest value and best option is to responsibly recycle the tire. In fact, the state's Waste Tire Management and Recycling Act of 2003 mandates that the Department of Economic Development

"...assist private market development with new technologies for waste tire reuse and recycling with an emphasis on higher-value end uses in order to further create and enhance sustainable markets."⁸

A moratorium or prohibition on the use of crumb rubber would impose severe impediments to developing these markets. Approximately 13 percent of all recycled rubber generated in New York State goes to a synthetic turf market. With a moratorium in place the delicate balance of supply and demand would be disrupted and the recycled rubber would be forced to flow to other markets. From an environmental perspective, tire recycling serves to ensure tire piles are not created and protects the public health by removing breeding grounds for vermin such as rats and mosquitoes. Scrap recyclers are working diligently to eliminate dangerous tire piles. These tires, and indeed all scrap tires, need an end use market. Without such markets, there will be no place for the processed rubber to go. This is why it is so important for a market driven policy, such as the one that New York State uses to ensure specification grade recycled rubber is sent to a market that demands its use, be given all reasonable consideration.

There is one last key point to consider. New York City is one of the world's premiere cities. Across the country, if not the world, municipalities look to New York City for guidance on a whole host of issues. Should the City Council adopt Intro. No. 739, it would send a signal to other municipalities across the nation that crumb rubber is not a safe product. As discussed earlier, New York City's Department of Health and Mental Hygiene has indicated this material is safe for recreational

⁸ Waste Tire Management and Recycling Act, §27-1909.

purposes. We urge you to consider the science, instead of emotion and do what is best for our environment and the citizens of New York who rely on these recreational facilities that might not otherwise exist in such good condition if crumb rubber was banned.

For all the reasons stated above, and for the good of the athletic and recreational citizens of this great city, we urge you to defeat Intro No. 739.



TESTIMONY OF WILLIAM BIALOSKY
PRESIDENT, DOWNTOWN MANHATTAN SOCCER LEAGUE
PARKS AND RECREATION OVERSIGHT COMMITTEE
NEW YORK CITY COUNCIL

FEBRUARY 9, 2009

Good Morning. My name is William Bialosky. I am an architect, a parent, a soccer coach, and the President of Downtown Manhattan Soccer League, a community-based not-for-profit serving 900 children. I speak today for my own organization, as well as for other large leagues in my area, including the Downtown Football League (serving 400 kids), and Downtown Little League, which will enroll another 800 kids this Spring.

In general, as the Committee is aware, the large, mainstream recreation providers – from the Little Leagues to the soccer leagues, to the YMCAs, and so on – have supported and applauded this Committee's desire to explore sensible, workable ways to make the City's overused, overstressed playing fields safe, healthy – and available.

The legislation now before this Committee – Bill 739 in particular – will not advance these goals in any way. Indeed, the all-but certain outcome would be the shutting down of many existing sports fields and delays in the opening of others.

By far the biggest health crisis we face in this City in relating to sports fields is the lack of them. Epidemics of obesity and diabetes are rampant in New York, with a

proven connection to lack of physical activity. Kids who play sports are less likely to be depressed, to commit suicide, to drop out of school, or get into other kinds of trouble. Why are more and more kids – and adults – being turned away from recreation programs? Because there aren't enough open, accessible fields.

For this reason, a broad coalition of community leaders, from PTA presidents to community board committee chairs, as well as over twenty league presidents, wrote to this Committee to oppose a prior moratorium on all-weather field upgrades. I attach a copy of that letter as an exhibit to my testimony.

Like the ill-concieved moratorium scheme of last year, the main intuitive before this Committee today -- Bill 739 – would be destructive and disruptive to virtually all users of public sports fields. 739 would halt or delay many immensely popular park upgrades, which neighborhood residents have long been fighting for. The requirement that approximately 90 fields be closed unless Parks meet an arbitrary and unrealistic goal of a total retrofit with one year, would lead to the widespread padlocking of these fields in many communities, especially in the current budgetary environment.

This bill would be a disaster for community recreation programs in all five boroughs and we would urge our parents and those of our affiliated programs to oppose it strongly.

Thank you.

William Balosky

bill@bialosky.com

917-749-8247

THE GREEN LEAGUES ALLIANCE OF NEW YORK
c/o 295 Greenwich Street, Box 157, New York, NY 10013
Email: Info @ GreenLeagues.org

February 3, 2008

Hon. Helen D. Foster
Chair, Committee on Parks and Recreation, New York City Council
1377 Jerome Ave
Bronx, New York, 10452

cc: Mayor Michael Bloomberg
New York City Council Speaker Christine C. Quinn
Councilmember Joseph P. Addabbo, Jr.
Councilmember Dennis P. Gallagher
Councilmember Alan J. Gerson
Councilmember Letitia James
New York City Parks Commissioner Adrian Benepe

Re: All-Weather Turf and City Playing Fields

Dear Council Member Foster,

We write to you as leaders of local not-for-profit recreational providers serving over fifteen thousand kids across the City. Recently, there has been discussion of a potential ban on new athletic fields using all-weather turf. A ban would block desperately needed fields. A ban would keep our kids on dirt, mud and dangerous asphalt. We oppose such a ban and would urge our families to speak out strongly against any such measure.

We do not believe that all asphalt yards or browned-out fields should be upgraded to artificial turf unless communities have asked for this. Nor are we satisfied that the crumb rubber infill currently favored by the Parks Department is the only appropriate synthetic design option for New York. We do believe, however, that well-maintained all-weather fields of the "greenest" possible specifications can play an indispensable role in meeting the vast demand for year-round youth and adult recreation.

A one-size-fits-all moratorium is a simplistic, insensitive, and completely disempowering approach to a complex and deeply local issue. Where year-round fields are justified by proven and vocal community demand, we ask your committee to speed, and not delay, the creation of these highly popular facilities.

Thanks for your continued advocacy for our parks.

Sincerely,

s/David Aronowitz
President
South Riverdale Little League
The Bronx

s/Alex Martinez
President
Inwood Little League
Manhattan

s/Burt Wilkes
President
Brooklyn Cosmopolitan
Junior Soccer League

s/Jim Svendsen
Athletic Director
Sporting Club Gjoa
Soccer of Brooklyn

s/Rich Caccappolo
President
Greenwich Village Little League

s/Richard Berlin
Executive Director
Harlem RBI, Inc

s/Bob Townley
Executive Director
Manhattan Youth, Inc.
& Downtown Day Camp

s/Don Schuck
President
Downtown Soccer League
Manhattan

s/Tobi Bergman
President
Pier, Park & Playground Association

s/Francisco Perez
Director
New York Gothams Baseball

s/Jim Gilliam
President
Manhattan Kickers Soccer Club

s/Frank Florio
President
Yorkville Little League & Girls Softball

s/Michael Conlon
President
Peter Stuyvesant Little League

s/Ken Burns
Co-Founder
Gorillas Travel Baseball of
Brooklyn & Manhattan

s/Cindy Sirko
Downtown United Soccer Club
Gotham Girls Football Club

s/Kevin Doherty
2007 President
PS 234 Parent Teachers Assoc.

s/Brian Giffen
President & Founder
Downtown Youth Giants Football

s/Ann DeFalco
Chair
South Bridge Parent & Youth
Association, Inc.

s/Mark Costello
President
Downtown Manhattan Little League

s/Elizabeth Lamere
Co-Founder
Financial District Family
Association (FiDiFA) of Manhattan

s/John DeMateo
Director of Athletics
Manhattan of Technology
Jacob Riis School (P.S. 126)
Chinatown

TESTIMONY RE: INT. NO. 739 BY LYN SELTZER

My name is Lyn Seltzer. I am the fields' coordinator for the Manhattan Kickers' Travel soccer program, and am here representing the Cosmopolitan Junior Soccer League as well. I wish to speak about which I am most familiar, the three turf fields in East River Park.

Prior to the installation of artificial turf early this decade, the fields were all of extremely poor quality. Built on landfill, natural grass could not be sustained, resulting in surfaces of dirt, rock, and brick that were not conducive to quality play and were quite dangerous. Furthermore, the fields were often rendered unplayable by even a moderate rainfall.

The installation of synthetic turf has been a godsend, both to the Cosmopolitan Junior Soccer League, and to our program in particular. The smooth, consistent surface facilitates development of basic soccer skills such as dribbling, passing, and trapping. Kids become more adept, allowing them to enjoy soccer more, and encouraging them to want to play more. Practices and matches almost never have to be cancelled due to weather-related field conditions.

The safety of our kids is of primary concern, and this recent controversy over lead exposure deserves the serious attention you are giving it.

In preparing for this hearing, I researched this matter, and found that virtually every major study conducted in the last couple of years has concluded that synthetic fields do

not pose a significant health risk to children. These include reports issued by the Consumer Product Safety Commission, the Center for Disease Control, and New York City's own Department of Health and Mental Hygiene (attached).

It can be argued, in fact, that synthetic fields are safer than natural grass, which often utilize pesticides, herbicides, and fertilizers that can release harmful chemicals into the air. Also, a study by the American Journal of Sports Medicine found that athletes are far more susceptible to ligament tears and concussions playing on grass fields.

In conclusion, I urge the Council to reject Int. No. 739. While well meaning, this proposed legislation is a gross overreaction to the issue at hand. There should be ongoing testing for lead levels at synthetic fields for sure. However, to order that existing fields be torn up, and to impose a moratorium on the construction of new fields, is unwarranted. Such action would have dire consequences for youth sports programs in the City.

NEWS from CPSC

U.S. Consumer Product Safety Commission

Office of Information and Public Affairs

Washington, DC 20207

FOR IMMEDIATE RELEASE

July 30, 2008

Release #08-348

CPSC Hotline: (800) 638-2772

CPSC Media Contacts: (301) 504-7908

CPSC Staff Finds Synthetic Turf Fields OK to Install, OK to Play On

WASHINGTON, D.C. - The U.S. Consumer Product Safety Commission (CPSC) staff today released its [evaluation](#) (pdf) of various synthetic athletic fields. The evaluation concludes that young children are not at risk from exposure to lead in these fields.

CPSC staff evaluation showed that newer fields had no lead or generally had the lowest lead levels. Although small amounts of lead were detected on the surface of some older fields, none of these tested fields released amounts of lead that would be harmful to children.

Lead is present in the pigments of some synthetic turf products to give the turf its various colors. Staff recognizes that some conditions such as age, weathering, exposure to sunlight, and wear and tear might change the amount of lead that could be released from the turf. As turf is used during athletics or play and exposed over time to sunlight, heat and other weather conditions, the surface of the turf may start to become worn and small particles of the lead-containing synthetic grass fibers might be released. The staff considered in the evaluation that particles on a child's hand transferred to his/her mouth would be the most likely route of exposure and determined young children would not be at risk.

Although this evaluation found no harmful lead levels, CPSC staff is asking that voluntary standards be developed for synthetic turf to preclude the use of lead in future products. This action is being taken proactively to address any future production of synthetic turf and to set a standard for any new entrants to the market to follow.

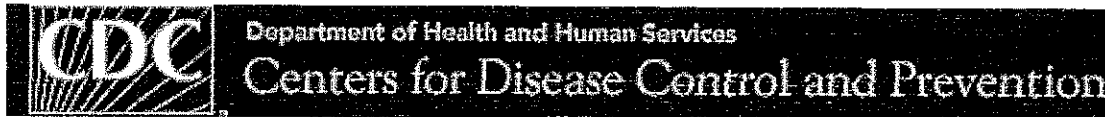
As an overall guideline, CPSC staff recommends young children wash their hands after playing outside, especially before eating.



Consumers can also view a [video clip \(transcript\)](#) about lead and synthetic turf. This is in "[streaming video](#)" format.

Send the link for this page to a friend! The U.S. Consumer Product Safety Commission is charged with protecting the public from unreasonable risks of serious injury or death from thousands of types of consumer products under the agency's jurisdiction. The CPSC is committed to protecting consumers and families from products that pose a fire, electrical, chemical, or mechanical hazard. The CPSC's work to ensure the safety of consumer products - such as toys, cribs, power tools, cigarette lighters, and household chemicals - contributed significantly to the decline in the rate of deaths and injuries associated with consumer products over the past 30 years.

To report a dangerous product or a product-related injury, call CPSC's hotline at (800) 638-2772 or CPSC's teletypewriter at (800) 638-8270, or visit CPSC's web site at www.cpsc.gov/talk.html. To join a CPSC email subscription list, please go to <https://www.cpsc.gov/cpscclist.aspx>. Consumers can obtain this release and recall information at CPSC's Web site at www.cpsc.gov.



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Distributed via Health Alert Network

Wednesday, June 18, 2008, 16:10 EDT (4:10 PM EDT)

CDCHAN-00275-2008-06-18-ADV-N

Potential Exposure to Lead in Artificial Turf: Public Health Issues, Actions, and Recommendations

Public Health Issues

In the course of conducting a routine health investigation at a metal facility in Newark, NJ, the New Jersey Department of Health and Senior Services (NJDHSS) and the Agency for Toxic Substances and Disease Registry (ATSDR) tested a nearby community athletic field for lead contamination. Samples taken from the field showed high levels of lead in the field dust, but the lead did not come from the scrap metal facility.

The Centers for Disease Control and Prevention (CDC) is partnering with its sister-agency, ATSDR, to monitor this situation because of CDC's expertise in lead poisoning prevention.

After determining that the lead source was the artificial turf, NJDHSS began to test other artificial turf fields looking for similar high lead levels in artificial turf fibers. These findings raised concerns about potentially high lead levels in artificial turf used in other locations including fields and playgrounds. NJDHSS tested a limited sample of athletic fields in New Jersey. Any questions regarding the specific fields tested should be directed to NJDHSS.

As determined by NJDHSS, limited sampling of additional athletic fields in New Jersey and commercial products indicates that artificial turf made of nylon or nylon/polyethylene blend fibers contains levels of lead that pose a potential public health concern. Tests of artificial turf fields made with only polyethylene fibers showed that these fields contained very low levels of lead.

Information provided by NJDHSS to CDC and ATSDR indicates that some of the fields with elevated lead in either dust and/or turf fiber samples were weathered and visibly dusty. Fields that are old, that are used frequently, and that are exposed to the weather break down into dust as the turf fibers are worn or demonstrate progressive signs of weathering, including fibers that are abraded, faded or broken. These factors

should be considered when evaluating the potential for harmful lead exposures from a given field.

The risk for harmful lead exposure is low from new fields with elevated lead levels in their turf fibers because the turf fibers are still intact and the lead is unlikely to be available for harmful exposures to occur. As the turf ages and weathers, lead is released in dust that could then be ingested or inhaled, and the risk for harmful exposure increases. If exposures do occur, CDC currently does not know how much lead the body will absorb; however, if enough lead is absorbed, it can cause neurological development symptoms (e.g. deficits in IQ). Additional tests are being performed by NJDHSS to help us better understand the absorption of lead from these products.

In general, children less than 6 years old are more likely to be affected by lead than adults because of increased contact with lead sources in the environment, including lead contaminated house dust and soil. Children also absorb lead more easily. Children's developing nervous systems are also more susceptible to the adverse health effects of lead including developmental delay and behavioral problems.

It should be emphasized that although turf testing has been limited to the state of New Jersey, no cases of elevated blood lead levels in children have been linked to artificial turf on athletic fields in New Jersey and elsewhere. Concerned parents should talk to their child's pediatrician about potential and known sources of lead in their children's environment and whether their children should have a blood lead test. This is a simple blood test that is paid for by most private insurers and by Medicaid.

NJDHSS has asked the United States Consumer Product Safety Commission (CPSC) to investigate this potential problem and CDC and ATSDR are currently waiting for information from CPSC to help guide future public health recommendations and actions.

Interim Public Health Actions Related to Testing Artificial Turf Products and Reducing Potential Exposures to Lead

NJDHSS's testing of artificial turf fields was limited and only sampled turf containing nylon. Since NJDHSS, CDC and ATSDR did not test fields composed of substances other than nylon and nylon/polyethylene blend, we do not know if lead is also a component in other types of artificial turf. Additionally, not necessarily all turf made of nylon contains elevated amounts of lead.

CDC has long recommended ***the elimination of all nonessential uses of lead.*** Because it is unclear whether all artificial turf contains lead at this time, CDC and ATSDR only recommend testing artificial turf fields that appear worn or weathered.

As a precaution, until further guidance is available from CPSC and until we have more information about the absorption of lead from artificial turf products and its capability of harm, CDC and ATSDR recommend:

- Testing turf that has fibers that are abraded, faded or broken, contains visible dust, and that is made from nylon or nylon-blend fibers. Information about testing is provided later in this alert.
 - If the dust contains more than 400 ppm lead, do not allow turf access for children under the age of 6 years.
 - If access is restricted, care should be taken to ensure that alternative sites contain lead levels less than 400 ppm.
- Not testing turf made from polyethylene-only fibers. This recommendation is based on currently available data.
- Not testing turf made from nylon or nylon blends that is not worn and does not

- contain visible dust. These fields should be routinely monitored for wear and dust generation.
- Replacing fields as soon as practicable if worn and dusty, as a precautionary measure.

CDC recommends testing children's blood lead levels in accordance with state guidelines. Concerned parents/caregivers should consult their medical providers for further information.

General Recommendations on the Use of Fields with Artificial Turf

At this time, CDC does not yet understand the potential risks associated with exposure to dust from worn artificial turf. The following precautions can be taken to minimize any potential risk.

- Field managers should consider implementing dust-suppression measures. Suggestions for dust-suppression methods can be found at NJDHSS's website, which is provided in the additional information section.
- Children ages 6 and younger are most susceptible to lead's harmful health effects. To protect the public, in particular young children, consider posting signs indicating that:
 1. After playing on the field, individuals are encouraged to perform aggressive hand and body washing for at least 20 seconds using soap and warm water.
 2. Clothes worn on the field should be taken off and turned inside out as soon as possible after using the field to avoid tracking contaminated dust to other places. In vehicles, people can sit on a large towel or blanket if it is not feasible to remove their clothes. These clothes, towels, and blankets should be washed separately and shoes worn on the field should be kept outside of the home.
 3. Eating while on the field or turf product is discouraged.
 4. Avoid contaminating drinking containers with dust and fibers from the field. When not drinking, close them and keep them in a bag, cooler, or other covered container on the side of the field.

General Lead Poisoning Prevention Recommendations

Especially in houses where children are present, parents, day care providers and other child care providers should **follow lead safety practices** regardless of the type of playing surface. These practices can help prevent children from being exposed to the many sources of lead in the environment.

1. Wash children's hands frequently and always before they eat.
2. Do not eat food or use pacifiers that have been dropped on the floor or outside.
3. Remove shoes when entering the house or use door mats.
4. Have your house inspected for lead if it was built before 1978.
5. Use lead-safe work practices when doing work that disturbs lead-painted surfaces.

Lead Testing of Artificial Turf Fields

Facility managers who choose to have the turf at a field tested for lead should contact their local or state department of health and/or environment about appropriate sample collection and analytic methods. CDC and ATSDR recommend using appropriate U.S. Environmental Protection Agency, National Institute for Occupational Safety and Health, or American Society for Testing and Materials methods.

Additional Information

For additional information about testing, dust suppression measures, and other topics related to NJDHSS's work to address lead in artificial turf visit NJDHSS's artificial turf

website at <http://www.state.nj.us/health/artificialturf/index.shtml>.

For a list of state health departments, visit the Association of State and Territorial Health Officers (ASTHO) site at http://www.astho.org/index.php?template=regional_links.php.

ASTHO also provides a list of state environmental health directors at: http://www.astho.org/index.php?template=enhancing_environmental_health_s.html.

The U.S. Consumer Product Safety Commission regulates consumer products, including artificial turf. Additional information about CPSC and artificial turf can be found at <http://www.cpsc.gov>.

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This page last reviewed: November 10, 2003

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[Department of Health and Human Services](#)

A REVIEW OF THE POTENTIAL HEALTH AND SAFETY RISKS FROM SYNTHETIC TURF FIELDS CONTAINING CRUMB RUBBER INFILL

Prepared for
New York City Department of Health and Mental Hygiene
New York, NY

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Windsor, Connecticut

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May 2008

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EXECUTIVE SUMMARY

1. Background and Purpose of Review

Synthetic turf fields have been installed in many athletic and playing fields throughout New York City (NYC), the United States and the world. The NYC Department of Parks and Recreation (DPR) began installing synthetic turf playing fields in 1997 with a total of 94 installations completed at the time of this report (87 crumb rubber infill fields and 7 carpet-style fields). An additional 68 synthetic turf fields are either planned or under construction around the five boroughs. Of these planned fields, 32 will have crumb rubber infill for use in high impact areas and the other 36 will be carpet-style turf. The carpet-style synthetic fields are part of the PlaNYC effort to address the increased demand for playing space by converting existing asphalt fields into multi-purpose use fields.

Synthetic turf fields are used in NYC parks because they:

- Provide even playing surfaces.
- Have padding that helps prevent injuries.
- Need no watering or mowing.
- Use no fertilizers or pesticides.
- Can be used year-round and in most weather.
- Do not need to be closed to protect or re-sod grass.
- Last a long time with little maintenance.

This report focuses primarily on synthetic turf fields with crumb rubber infill. The infill-type synthetic turf fields in NYC parks contain several layers, including:

- A bottom layer composed of geotextile.
- Middle layers composed of broken stone with plastic perforated pipe for drainage and rubber padding for shock absorbance.
- A top layer composed of carpet with soft, flexible plastic grass.
- Crumb rubber infill made from recycled tires added to the 'grass' layer to provide extra padding, serve as a ballast to hold the carpet down, and keep the grass upright. Sand is sometimes mixed with the crumb rubber.

Recent concern about the potential for exposure to chemicals found in crumb rubber, also known as ground rubber, prompted NYC DPR to request assistance from the NYC Department of Health and Mental Hygiene (DOHMH). In response to this request, and with a grant awarded by the New York Community Trust, the DOHMH contracted a private consultant, TRC, to lead an intensive literature review focusing on the potential exposures and health effects related to synthetic turf fields and to identify gaps in what is known.

This report includes an assessment of the currently available literature and is meant to assist athletic field installers and operators in making decisions related to the selection and use of synthetic turf fields. The report is organized into six chapters. The Executive Summary provides a brief overview of the findings of this report. Chapter 1 provides the background and scope of work. Chapter 2 covers the chemical composition of the crumb rubber infill and develops a list of chemicals of potential concern (COPCs). Chapter 3 covers the potential for exposure to and human health effects from the COPCs. Chapter 4 is a review of the physical health effects associated with synthetic turf systems, including the risks for physical injury, heat-related illness, burns and infections with Methicillin-Resistant *Staphylococcus Aureus* (MRSA). Chapter 5 lists benefits associated with using synthetic turf fields. Chapter 6 provides recommendations for the crumb rubber industry and synthetic turf field operators. A summary of the reviewed articles is included as an appendix under the relevant section headings.

2. General Findings

Components of Crumb Rubber

The crumb rubber used in synthetic turf systems is made primarily from recycled waste tires. The tires themselves contain several COPCs, and undergo minimal processing to become crumb rubber. Direct and indirect methods have been used in studies to determine the presence of these COPCs in the crumb rubber. These studies have found polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), benzothiazole, and certain metals. Studies have also identified phthalates, alkylphenols and benzene, which likely become bonded to tires during their use. Direct analyses confirming the presence of these COPCs in crumb rubber have used vigorous extraction methods. Some COPCs have been identified through indirect methods including analysis of leachate in the environment near where recycled tire products were used or in controlled laboratory studies. Because crumb rubber is a recycled material, the presence and concentrations of COPCs is expected to vary between products and even among batches from the same manufacturer.

Potential Health and Safety Risks Associated with Synthetic Turf Fields

For the COPCs in the crumb rubber to be a health concern for users of the fields, users would have to be exposed to high enough concentrations to increase the risk for health effects. The three possible routes of exposure for COPCs from crumb rubber are inhalation, ingestion,

and dermal absorption. Crumb rubber, or the dust generated from crumb rubber, may be accidentally ingested by placing fingers in the mouth or not washing hands before eating and after playing on the fields. Young children on the fields may eat the crumb rubber itself. Dust may be breathed in from playing on the field, or vapors that volatilize from the turf may also be inhaled. Some COPCs may also be absorbed through the skin by direct contact.

To date, eleven human health risk assessments were identified that evaluated exposure to the constituents in crumb rubber. Although each risk assessment was conducted using distinct assumptions and evaluated different concentrations of COPCs in crumb rubber, all had a similar conclusion: exposure to COPCs from the crumb rubber may occur, however the degree of exposure is likely to be too small through ingestion, dermal or inhalation to increase the risk for any health effect. These risk assessments have been conducted primarily by state agencies, consultants and industry groups. They are based upon quantitative measurement of the chemicals from various forms of tires (scrap tire, shreds, tire crumb rubber, recycled tire flooring, etc) with levels derived from leachate studies or ambient air testing. Risk assessments evaluating oral and dermal exposures used these surrogate concentrations for exposure and a number of assumptions pertaining to ingestion rates, dermal contact rates, bioavailability, etc. Thus, these evaluations are theoretical estimates of exposure and risk. However, the highest available concentrations combined with scenarios which overestimated the duration of the exposure make these risk assessments conservative. Similar to the oral and dermal risk assessments, each of the inhalation risk assessments used conservative estimates of exposure and maximum concentrations of indoor air contaminants.

Children, especially very young children, have many characteristics which make them uniquely vulnerable to environmental exposures. Children breathe more air per pound of body weight than adults in the same environment and physical activity adds an additional factor to exposure through inhalation. Children also engage in hand-to-mouth behavior and very young children may eat nonfood items, such as rubber crumbs while on the fields. The protective keratinized layer of the skin is not as well developed in children and increases dermal absorption of COPCs as well as increasing evaporative loss of water on hot days. Children also have many more years to develop diseases with long latency periods after exposure. Risk assessments looking at inhalation, ingestion, dermal absorption and the risk for heat stress would have to combine these considerations to be as conservative as possible. It appears that these considerations were addressed by the reviewed health risk assessments. However, uncertainties

exist in the magnitude of factors to account for children's increased susceptibility. As our understanding of the impact of low-level environmental exposures during childhood increases, the inclusion of new data in future risk assessments may be warranted.

Due to the distinct physical characteristics of synthetic turf systems, there has also been concern over potential adverse health effects not related to chemical exposure. The potential physical health effects associated with synthetic turf systems include heat-related illnesses, burns, injuries and infections.

Heat-Related Illness - Synthetic turf fields with crumb rubber have heat-absorbing properties and can retain elevated temperatures at their surface. This increase in temperature of the turf system may increase the risk of heat-related illness among field users.

Physical Injuries - Concerns over the potential for increased injuries associated with the use of synthetic turf systems have led to a number of studies among athletes to evaluate any differences in injury rates, injury types, and lost time between synthetic and natural turf materials. These studies have shown either no major differences in the incidence, severity, nature or cause of injuries sustained on natural grass or synthetic turf by men or women, or that injury rates are similar but that the type of injury varies between the two surfaces.

Bacterial Infections - Concerns have been raised over the potential for bacterial infections, such as MRSA infections, to occur in athletes playing on synthetic turf. Studies among school and professional athletes have shown that although synthetic turf abrasions provide a means of access for infections, transmission of infection occurs via physical contact, sharing of equipment, and poor sanitary practices. Another study found that synthetic turf systems are not a hospitable environment for microbial activity. However, an increased number of abrasion injuries could increase the risk of various infections if other safeguards aren't maintained.

3. Data Gaps and Recommendations

Certain knowledge gaps associated with exposure to synthetic turf fields have been identified. Highlighted gaps, and recommendations to address them, are listed below:

Gap: Consistent test methods for determining the chemicals in crumb rubber made from different source materials and from different processing techniques.

Recommendation: The crumb rubber industry should provide information on the COPC content of products and documentation on the testing methods and criteria used to identify COPCs. Consistent and validated testing methods should be established through an objective process and complied with by the industry. This information, along with the heat absorption and injury properties of synthetic turf, should be provided to prospective buyers.

Gap: Outdoor air concentrations of COPCs on both newly installed and older synthetic turf fields. Most of the data generated have been from indoor synthetic turf facilities.

Recommendation: Field operators should measure air concentrations of COPCs and particulate matter above outdoor fields to give more representative data related to use of playing fields in urban parks. Measurements taken on a hot, calm (no wind) day would represent a worst case scenario.

Gap: Background air concentrations of COPCs in New York City. Many of the COPCs found in crumb rubber are also present in the urban environment, but there is little available data on background levels of these COPCs.

Recommendation: When conducting air studies over fields with crumb rubber, air measurements should also be taken simultaneously at nearby off-field sites, as well as on natural and/or asphalt fields, to provide comparative data on exposures related to urban environments.

Additional Recommendations:

Heat: The primary health concern with the use of synthetic turf fields is the potential for causing physical health effects associated with heat stress and dehydration. It is recommended that field operators assess the feasibility of adding shaded areas and easy access to drinking water near playing fields. It is also recommended that field operators educate field management staff, coaches and athletic staff, field users, and parents on the potential for heat-related illnesses, and how to recognize and prevent heat-related symptoms and illness.

Purchasing Protocol: Field operators should adopt protocols for selecting and purchasing synthetic turf and crumb rubber products. Such protocols should include requirements for suppliers and manufacturers to provide available information on: chemical content of products, potential COPC emissions from products over time, heat absorbency characteristics, injury factors and other relevant health and safety information. In addition, protocols should provide for the continuous evaluation of new technologies, health and safety factors, and best practices for use and maintenance of synthetic turf fields.

4. Conclusions

This comprehensive review of the available literature on the potential health effects of crumb rubber infill from synthetic turf fields has demonstrated that the major health concern from these fields is related to heat. COPC concentrations from the crumb rubber vary depending on the type of crumb rubber, the method of extraction used for analysis, and the media measured (crumb rubber, air, leachate). Eleven different risk assessments applied various available concentrations of COPCs and none identified an increased risk for human health effects as a result of ingestion, dermal or inhalation exposure to crumb rubber. However, additional air studies at synthetic turf fields as well as background air measurements would provide more

representative data for potential exposures related to synthetic field use in NYC, particularly among younger field users.

More Artificial Turf Found with Lead, as California Attorney General Files Lawsuits

Sept 02, 2008

Testing shows high lead levels in turf from Field Turf, Tiger Turf, EcoAlliance and turf purchased from Cosco, among other companies

Oakland, CA- The Center for Environmental Health (CEH) announced today that independent testing has found high levels of lead in varieties of artificial turf from ten more companies. The testing found that the lead level in one turf sample, produced by the nation's leading installer of sports fields, Field Turf, was more 150 times higher than federal child safe lead standards that will ultimately come into effect as a result recent Congressional action to ban lead in products for children.

In June, CEH initiated the first legal actions under California law against fifteen other producers and retailers of artificial turf and indoor/outdoor grass carpeting. Today, the California Attorney General, the Los Angeles City Attorney and the Solano County District Attorney filed suit against three of the turf producers identified by CEH, while CEH filed suit against three other producers and notified ten other companies that their turf violates California law.

"Our testing on products from dozens of companies show that artificial turf can contain high amounts of lead that can easily come off onto children's hands when they play on turf fields," said Michael Green, Executive Director of CEH. "The artificial turf industry must understand that their products need to meet our state's strict lead safety standards. We welcome action by the Attorney General and other government officials who are working to clean up this threat to California's children."

CEH has commissioned independent testing to determine if lead from turf wipes off on contact. In every case, samples tested by the laboratory show that when turf contains high amounts of lead, the lead wipes off at levels that exceed California standards. Others have found similar results: testing conducted for the Oregon Statesman Journal on a high school sports field installed by Field Turf found lead levels far in excess of federal and California standards. Children playing on artificial grass can be exposed when lead from turf wipes off onto their hands (from hand-to-mouth behaviors), and young children may be more at risk since they are more likely to swallow turf material. Children can also be exposed when turf degrades in the sun and releases lead-tainted dust. In June, the Centers for Disease Control (CDC) warned that "As the turf ages and weathers, lead is released in dust that could then be ingested or inhaled, and the risk for harmful exposure increases."

CEH is recommending that parents and schools be sure that children wash their hands thoroughly after playing on artificial turf fields. The nonprofit is also announcing that parents, schools or others with artificial turf fields can send samples of turf for free lead testing to the nonprofit's Oakland office.

In July, the federal Consumer Product Safety Commission released an assessment that claimed to find no lead threat from artificial turf, even though their testing found that lead can come off of turf at a level that is almost twenty times higher than the California standard. CPSC looked at only fourteen samples from four companies; to date, CEH has tested over 150 samples from more than two dozen companies, and has found about 30% of the samples contain high lead levels. Last month, Connecticut Attorney General Richard Blumenthal called the CPSC assessment "crudely cursory" and requested that the agency withdraw its report.

Recent reports have found high lead levels in turf on artificial turf playing fields, but the CEH testing shows that artificial grass used by residential installers and sold to do-it-yourselfers can also be a health threat. In addition to Field Turf, the recent CEH testing found high lead levels in turf from nine other companies, including Pregra artificial grass sold at Cosco, and turf produced by Tiger Turf, EcoAlliance, Poly Lawn, Challenger Industries/ X-Grass, Lazy Lawn/Best Turf for Less, Lex Lawn/ProGreen, Turfstore and Taishan Sports. CEH also filed lawsuits today against companies the nonprofit previously notified for their lead-containing turf, including Shaw Industries, Synthetic Turf International, and Turf Headquarters, while the Attorney General and other California officials filed suits against turf makers Field Turf, AstroTurf, and Beaulieu of America. CEH has been in discussions with AstroTurf and has welcomed the company's strong intention to clean up the problem.

CEH initiated legal action against the turf companies under California's Proposition 65 law, and is calling for turf makers to reformulate their products to eliminate the lead risk to children. The turf industry has stated that it will voluntarily comply with the recent federal law banning lead in children's product. Since voluntary industry standards are unenforceable, the CEH effort intends to hold the companies to a legally binding lead standard.

Earlier this summer, the California Assembly passed a bill (SB 1277) sponsored by Senator Abel Maldonado (R-Santa Maria) calling for a state study investigating the health and environmental impacts of natural versus synthetic turf fields.

A CEH report and more information is available here http://www.cehca.org/storage/cehca/documents/lead_in_grass.pdf . Consumers with questions about sending samples for lead testing to CEH can call 510-655-3900.

Connecticut Attorney General's statement is available here.

The Oregon Statesman Journal report is available here.

Information on SB 1277 is available here.

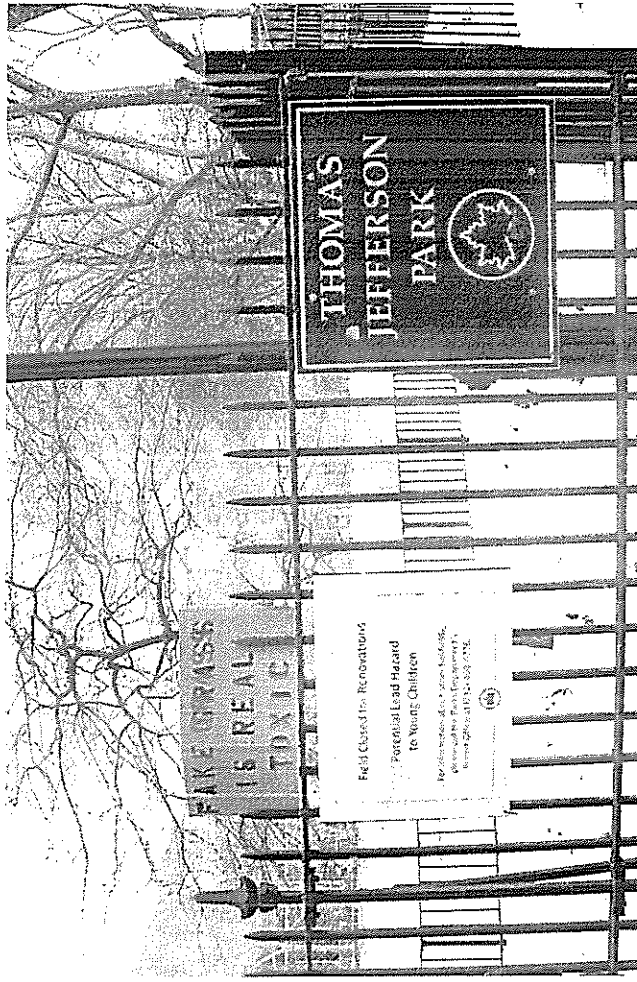
CONTACT: Charles Margulis, 510-697-0615 (cell); Caroline Cox, 541-654-2626 (cell)

forwarded by

New York Environmental Law & Justice Project Joel R Kupferman, Exec. Dir.
www.nyenvirolaw.org Lawproject@earthlink.net 212-334-5551
Chemical analysis reports are posted,



picture taken February 9, 2009



Lexington Avenue at E113th St 12-23-08 Artificial Turf area is fenced off...



Thomas Jefferson Park East Harlem December 23, 2008 ...

@JoelR.Kuyfman

*NEW YORK ENVIRONMENTAL
LAW & JUSTICE PROJECT*

envjed@ix.netcom.com

New York City Council Hearing
Int. No. 739, Int. No. 896

February 9, 2009

Testimony Submitted by:
Tanya L. Murphy
Board Member: Healthy World Healthy Child &
Mount Sinai Children's Environmental Health Center

It's confusing to me that we can allow our children to play on ground rubber recycled tires, which were formerly classified as hazardous waste. As a mother of two young children who are already playing organized sports, I am faced with the very real possibility that they will be playing on synthetic turf athletic playing fields that use ground rubber recycled tire crumbs which are on the surface of the fields by the tons – 100 tons per field I've been told. Ironically, our kids' parks and playing fields, where children should be the safest are now posing a threat to their health and wellbeing.

At risk are our children - unconsenting test subjects in a massive experiment. Currently over 125 million children suffer from cancer, autism, asthma, birth defects, ADD/ADHD and learning and developmental disabilities. Scientific evidence increasingly points to environmental chemicals as contributing to many of these diseases. More than 85,000 chemicals are currently in use in the marketplace today. Many we find in our homes and only about 4,000 of them have been tested for potential toxicity to adults, much less children.

Dr. Philip Landrigan, head of Mount Sinai School of Medicine's Children's Environmental Health Center reminds us that children have a unique vulnerability. Their organs are still developing and their most rapid cellular development is from conception to age 6. Pound for pound they breathe more air and consume more than adults. Because of their behavior they are more at risk too – putting hands in their mouths and being closer to the ground.

Grassroots organizations have worked hard to have pesticide use banned in places where they are unnecessary. In Connecticut, a ban is currently in effect to disallow the use of pesticides in day care centers and elementary schools.

But there's a new monster on our doorstep. We're going from the frying pan and into the fire and the proliferation of synthetic turf athletic fields have made the use of pesticides child's play. Across the country, schools and parks are replacing grass playing fields with the synthetic turf. There are over 3,500 fields in the US today and growing at a rate of 20%.

And athletic fields are just the beginning of this story. Recently the LA Metropolitan Water authority offered a rebate to its residential customers who install synthetic turf in the yards using the same technology (crumb recycled

tire rubber). In an article posted on FieldTurf's website, one of the nation's leading providers of this product, the owner of the California distributorship is quoted as saying, "I have seen the future, and it is (synthetic) turf!"

Here are the main reasons as parents, as a community and as a nation we should be concerned:

As reported on www.synturf.org:

Initial Research Shows: Junfeng Zhang, a professor of environmental and occupational health at the Rutgers University and Environment and Human Health, Inc. (EHHI, www.ehhi.org) have found that the granules contain worrisome levels of zinc and lead which are neurotoxic. Also found were polycyclic aromatic hydrocarbons (PAH's) that are known to be carcinogenic and attributed to asthma. Humans, especially children should not be in contact with these harmful substances, due to their unique vulnerability. Zinc, cadmium and lead were shown to leach into ground water and soil, which are neurotoxic to humans and harmful to aquatic life, in addition to being phytotoxic. (Which potentially could mean that if a field were removed, it would be hard to grow new grass where leaching had occurred.)

Stats: A 300-foot-long field that is 150-feet-wide is 45,000-square-feet, holding more than 450,000 pounds of ground-up rubber tire. The typical athletic game has 25 people playing vigorously on the surface for one hour or more. If a field were used for three hours a day there would be 21 hours of activity a week. That would amount to about 2,000 children/hours of activity a month on each field. It is possible that even on a modestly utilized field, there would be over 10,000 children/hours of use per year.

In addition:

- The Heat Effect: Temperatures have been recorded at 160 degrees which can present a real problem in young children due to heat exhaustion and dehydration. (Grass can actually lower the ambient air by 6 degrees. Have you ever sought refuge from the summer heat by sitting in the cool grass under a tree?)
- Grass and the trees that surround playing fields provides habitat for thousands of living creatures.
- CT Public health officials identified that "turf burns" provide an increased risk to athletes for the antibiotic resistant staf infection, MRSA.
- The cost of a new synthetic turf playing field is anywhere from \$750K to \$1.6 million and must be replaced every 10 years. Replacing a whole field with sod is about \$100K.
- Maintenance cost per square foot for synthetic turf is in excess of \$10, whereas grass/sod is less than \$1.00.
- Injuries – velocity of ball and turf burns much greater on synthetic turf

- Questionable fundraising tactics in Westport include creating a 501c.3 to allow parents from booster clubs and soccer, lacrosse and football associations the ability to donate money tax free, which means total emotional “by-in” by these generous families in wealthy communities. This money was brought to the municipality to take the \$750,000 cost per field out of the decision making equation.
- Organic grass turf field management, by my own estimates, cost around \$30K for the first year. Once the facilities manager is trained, and organic methods are used over a 3 year period, the cost decreases year after year. The grass is stronger, using a variety of fescues, with deeper root systems and the ability to ward off disease more readily using organics.

I encourage you to read “A Silent Spring” by Rachel Carson, the biologist who coined the term the “body burden”. Her message is that our bodies can not tolerate the onslaught of chemical exposures that we subject them to daily, without there being some price to pay.

Or read the new book by Mark Schapiro, of the Center for Investigative Reporting called “Exposed” which tells the story of how toxic chemicals in every day products can be marketed in the US with no oversight by government. In Connecticut last year, our legislature proposed a ban on BPA, a toxic plastic hardener, in kids’ products, only to be visited by a posse of Lego Company lobbyists who killed the bill. Upon leaving the Capital they admitted they already produced a BPA free product for the EU!

And finally, Dr. Bill Crain, a developmental psychologist and professor at City College in NYC says, “There’s a growing body of research suggesting that children need contact with greenery for their mental development. Natural settings help them develop their senses and powers of observation. Nature also stimulates children’s creativity; much of their poetry and artwork, for example, is inspired by grass, trees, water, wind, birds and other animals. Furthermore, natural settings have a calming effect on children.”

At the root of the issue, is that there’s a lot of money to be made without consideration to those who can’t decide for themselves what’s safe and what’s not safe. Our kids want to “make the team” or be a football star. Who am I to tell my son he can’t play football?! As a parent, we should not be put in the position to have to protect our children from threats like these.

Tanya L. Murphy
Board Member:

Healthy Child, Healthy World (www.healthychild.org) &
Mount Sinai School of Medicine’s Children’s Environmental Health
Center (www.cehcenter.org)

To the Parks Committee of the New York City Council - 2/9/09

My name is Rich Caccappolo. I am a business owner in Soho, a parent at PS 41 and MS104, a resident of Greenwich Village and president of Greenwich Village Little League, a youth baseball group with 750 players and 250 parent volunteers. I am here to speak about the fields our leagues use and the importance of sports activities to our families. We are among many thousands of families who will suffer if Intro 739 becomes law.

The first three crumb rubber fields in New York City were installed in our community, and all of the fields in our neighborhood are this type. Our teams play about 1000 games per year on crumb rubber fields.

The crumb rubber field on the roof at Pier 40 was installed in 1997, and based on its success, our home field at JJ Walker Park converted to crumb rubber the next year. JJ Walker was originally natural grass, but had become hardpan, not by neglect but by overplay. The field was unusable for days after a rain, and became a rock hard dust bowl when the sun shone. Ruts caused bad bounces and falls, and injuries were common. At night, the field was used as a dog run. Field turf has served us well for a decade. No mud. No dust. No injuries. No dog doo. The next year, Hudson River Park Trust converted a new natural grass field at Chelsea Waterside Park to crumb rubber because the grass had turned to mud in just one year of intense use by children and adults.

Since then, almost a hundred crumb rubber fields have been installed throughout the city and we believe this has provided a huge step forward in the quality of parks in every community, especially for children. But we also understand there are real concerns about the materials used and we greatly appreciate the diligence of this committee in seeking to take the next step. Your leadership efforts have helped inspire the industry to offer many new solutions. We are hopeful that the ultimate result will represent the next step forward, not a return to a time when many children had no safe place to play. We are here to offer our support and participation as the city moves forward. But we don't agree that fields should be closed except in rare cases where hazards are identified.

The City does not have the resources to replace so many fields at once, so in effect, this law would mandate closing many fields for a year and more. A typical field supports the activities two or more youth leagues and each league may serve 500 to 1000 children. Each field also serves schools whose teams have no place else to play, and many adult teams, too. Now do the math. Multiply times ninety fields. The locking of the gates is unimaginable. It would create an enforcement crisis, pitting the government against families. It would be an international embarrassment for our great city.

Those who don't have children who play sports may not understand the importance of this activity in our lives. It builds healthy bodies and healthy minds and it is an important fount for imagination, inspiration, and aspiration. Children work hard to improve their skills; they learn confidence in themselves and their teammates. For families, the leagues provide a small town experience in the big city, an important and often unique opportunity to create friendships across social and economic boundaries. Closing fields will disrupt community health and happiness not just in CB2, but in every council district.

We are proud that ten years ago our community and our youth sports leagues were leaders in the highly successful citywide initiative that brought the current field technology to our parks and moved our city beyond the disgraceful dust bowls of the 80's and 90's. It is time to begin the next era and we are ready to work with the Council and the Parks Department to help provide the safest, cleanest, and greenest parks in the world.

WEST SIDE LITTLE LEAGUE
c/o Debbie Kling
515 West End Avenue Apt. 16C
New York, NY 10024
February 9, 2009

Chairperson Helen D. Foster
Committee on Parks & Recreation
City Hall
New York, NY 10007

Dear Ms. Foster:

As President of the West Side Little League (WSLL), I am testifying to offer our experience with the new turf fields at 103rd Street in Riverside Park—fields that our organization helped finance and has enjoyed using for almost three years.

WSLL is a baseball and softball league for boys and girls aged 6 to 17. We field almost 100 teams and serve 1300 families, and we are particularly proud of our extensive scholarship program for children from low income families, as well as our Challenger Division, which includes handicapped youngsters from all five boroughs.

The League has been in existence for 24 years, and has always played the majority of its games in Riverside Park. We have three seasons: Spring, Summer, and Fall and play nine months of the year, from early March until late November. More than thirty of our teams now play their games on the new turf fields.

Our experience with these fields has been entirely positive and much superior to our experience with the grass-and-dirt (and stone) fields that preceded them.

As for the comparative advantages to us, as a baseball league, of turf fields—they have made possible the following:

- 1. Fewer cancellations due to rain on the day of the game. Moderate rain no longer makes our fields unplayable.**
- 2. Fewer cancellations due to a hard rain prior to a particular game or weekend. In years past, a hard rain on say, a Thursday or Friday turned our grass-and-dirt fields into muddy swamps, and often required canceling a weekend's games—this, when the weekend itself often proved sunny, or at least, not inclement.**

3. Fewer cancellations due to cold. A field can still be playable in moderately cold weather if the ground is not hard. In the past, the hard ground of late October and November—along with the colder temperatures of those months—often made our grass-and-dirt fields unplayable, limiting the length of our Fall Season.
4. Fewer cancellations due to some inclement combination of moderate rain and moderate cold—particularly common in early Spring and late Fall.
5. Turf fields are safer. The playing surface is even and regular, and balls bounce truer, with fewer “bad hops”. Rocks and stones do not “rise up” from underlying bedrock as often happens when dirt fields are leveled by dragging them.

In addition, the WSLL has been able for the first time to host Little League Tournament games of District 23 (on our dedicated clay-and-turf field). This has, of course, given our own teams a greater chance than in years past to advance in the tournament—and, this past summer, our 9-10's and our 11-12's Tournament Teams both won District 23 Divisional Championships for the first time. And, it has become a source of pride to our families and players to be able to offer this marvelous facility to the larger community.

More important, the new turf fields have been critical to the growth and stability of our league. We can now assure players and families that most scheduled games will be played, that most weekends will be predictable, and that it is worthwhile for their child to make a commitment to the new season and to the West Side Little League.

In sum, turf fields have resulted in fewer cancelled games due to bad weather. Or, to put it more positively—turf fields have produced more games, more activity, more exercise, more physical development, more excitement and more pleasure for the 1300 families of the West Side Little League.

Please feel free to contact me if you have any questions.

Sincerely,



Debbie Kling

President West Side Little League
212-799-5873 / 917-951-3081



RUBBER
manufacturers
association

1400 K Street, NW • Washington, DC 20005 • tel (202) 682-4800 • fax (202) 682-4809 • www.rma.org

Testimony from the Rubber Manufacturers Association
City Council of New York
Resolutions Int. 0739-2008; Int. 0896-2008; Int. 0918-2009
and Resolution 1782-2009.
February 9, 2009

Madam Chair and Council Members, my name is Michael Blumenthal; I am a vice president of the Rubber Manufacturers Association (RMA). The RMA is the principle trade group representing the eight US based tire manufacturers. I appear before the Council to provide testimony in support of Int. 0918-2008, Int. 0918-2008 and Resolution 1782 but in opposition to Int. 0739-2008.

No Federal, state or local jurisdiction classify tires or scrap tires as anything other than a non-hazardous material. Scrap tires are generally classified as either a non-hazardous special waste or material or as a non-hazardous solid waste. Processed scrap tires, in the form of ground (aka crumb) rubber are classified as a non-hazardous material.

I would like to provide some background on the tire manufacturing process. A tire is not merely a sum of its parts. The tire production process consists of four primary steps: preparation of the component materials, production of the components of the tire, and building of the tire and tire curing or vulcanization. The tire is cured with heat and pressure. During curing, the tire components are bound together chemically and physically. Chemical ingredients in the tire become part of the rubber matrix of the tire and are not bioavailable for exposure in the finished tire.

In a recent study prepared for the RMA (Review of the Human Health & Ecological Safety of Exposure to Recycled Tire Rubber found at Playgrounds and Synthetic Turf Fields), the health and ecological risks associated with the use of ground rubber in consumer applications, particularly playgrounds and athletic fields, were evaluated through a thorough review of the literature (126 references).

The review included studies from both advocates and opponents to the use of ground rubber. The conclusions of the report were that no adverse human health or ecological health effects are likely to result from these beneficial reuses of tire materials. I brought a copy of this report for the Council. It is also available on our website at www.rma.org.

Since the release of our study, several other studies have been released. The most recent is from a research company (Milone & MacBroom, Inc) in Connecticut concluded that the playing surfaces containing ground rubber were only a few degrees hotter than the ambient temperature; that off-gassing for compounds of concern was at "very low concentration" or not detected.

Lastly, their conclusion on leachate from tire rubber was consistent with the various field tests that showed that concentrations of various chemicals were well below the concentration thresholds for water quality standards.

National Perspective

In 2007 the United States generated 4612.4 thousand tons of scrap tires, approximately 303 million tires. In 2007, 807 thousand tons of ground rubber was consumed in the marketplace, representing 17 percent of the overall markets for scrap tires. This was a 46 percent increase from the amount of ground rubber consumed in 2005 (552.5 thousand tons). The major growth markets for ground rubber included infill for synthetic turf, playground cover, mulch and molded/extruded rubber products. This is a considerable achievement considering that prior to 1992 no scrap tires were consumed as ground rubber.

Many states actively support scrap tire-derived products. California, Missouri, Kansas and Kentucky have grant programs for the purchase of these products. Other states, such as New York and Florida, support higher, value-added scrap tire markets through educational and research programs. Overall, the scrap tire industry is moving towards increase production of ground rubber products, which serves both the industry and the county well.

RMA Positions on New York City Council Resolutions

The RMA supports Int. 0896-2008, since it is consistent with the findings and recommendations of the American Society of Testing & Materials (ASTM) Committee F08.63 (playgrounds), which recommended that signs be posted by playgrounds warning of elevated surface temperatures.

The RMA supports resolution 1782-2008 that would test the surface temperature for all playground surfaces. Similarly, RMA is in support of Int. 0918-2008. We agree that all playground surfaces should be tested not just for overall potential human health impacts, but which surface provides the greatest level of safety. It should be recognized that the State of Illinois conducted similar tests which revealed that rubber surfacing provided the highest level of impact attenuation. In other words, rubber is the safest material anyone can fall onto.

The RMA is opposed to Int. 0739-2008. There is no valid, scientific data to support banning rubber products in New York City. In fact, the weight of evidence fully supports the use of tire rubber-derived products in playgrounds and as an infill material in artificial sport surfacing.



New York City Installations

IS/HS 43 (July '08)
Staten Island, NY
Joe Spallina (516) 285-5500

Columbia University Baseball
Andy Coackley Field (Nov.07)
New York, NY
Douglas McKean (212) 854-7050

Tottenville High School (Nov. '07)
Staten Island, NY
Cliff Bloom (718) 356-2220

Manhattan College (May. '07)
Bronx, NY
Robert Byrnes (718) 862-7227

William E. Grady High School (Oct. '06)
Brooklyn, NY
Steven LaPlaca (718) 332-5000

Wagner College – Stadium (Aug. '06)
Staten Island, NY
Walt Hameline (718) 390-3488

Sara D. Roosevelt Park (Aug. '06)
New York City, NY
Adrian Benepe (212) 639-9675

Aviator Sports Complex (2 Fields) (May '06)
Brooklyn, NY
Anthony Gusmano (631) 691-2392

St. Joseph By the Sea – Baseball (April '06)
Staten Island, NY
Bob Alegere (718) 984-6500

Saint Peter's Boys High School (May '06)
Staten Island, NY
John Fodera (718) 447-1439

Columbia U-Lawrence Wien Stadium
(July '05)
New York, NY
Dr. Dianne Murphy (212) 854-2538

Randall's Island (June '05)
New York, NY
David Kane (212) 619-5000

Fordham Prep School (June '05)
Bronx, NY
Robert McLaughlin (718) 367-7500

Fordham U-Jack Coffey Field (May '05)
Bronx, NY
Francis McLaughlin (718) 817-4300

Hudson River Pk -Pier 40 Main Level
(Dec. '04)
Manhattan, NY
Rob Balachandran (917) 661-8740

Hudson River Pk -Pier 40 Rooftop (Dec. '04)
Manhattan, NY
Rob Balachandran (917) 661-8740

College of Staten Island - Softball (Dec. '04)
Staten Island, NY
Harold Merritt (718) 982-3150

Monsignor Farrell Catholic HS (Oct. '04)
Staten Island, NY
Louis Baldassano (718)987-2900

College of Staten Island-Soccer (Oct. '04)
Staten Island, NY
Harold Merritt (718) 982-3150

St-John's University – Dasilva Field (July '04)
Jamaica, NY
Dave Masur (718) 990-6191

Moore Catholic High School (July '04)
Staten Island, NY
Bill Sullivan (718) 982-7914

Fordham University-Murphy Field (July '04)
Bronx, NY
Francis McLaughlin (718) 817-4300

FIELDturf[®]

New York City Installations

St. Joseph by the Sea High School (June '04)
Staten Island, NY
Bob Alegere (718) 984-6500

Arena Soccer LLC (June '03)
New York, NY
Frederick Lesort (212) 688-3934

Parade Grounds at Prospect Park (3) (May '03)
Brooklyn, NY
Christian Zimmerman (718) 965-7767

Chelsea Piers – Pier 62 (Sept. '02)
New York, NY
Mike Braitto (212) 336-6800

St-John's U – Belson Soccer (Sept. '02)
Jamaica, NY
Dave Masur (718) 990-6191

Hudson River Park Trust-Segment 4 (Aug. '02)
Manhattan, NY
Rob Balachandran (917) 661-8740

Coney Island Baseball Park (May '02)
Brooklyn, NY
Mike Procops (718) 449-8497

Hudson River Pk-Chelsea Waterside (Mar. '02)
New York, NY
Rob Balachandran (917) 661-8740

Resurrection School (Nov. '01)
New York, NY
Brother Michael Farrell (212) 690-7524

John Adams High School (Sept. '01)
Ozone Park, NY
John O'Donahue (718) 322-0526

Long Island University-LIU Field (Sept. '01)
Brooklyn, NY
John Suarez (718) 488-1030

Parade Grounds at Prospect Park (June '01)
Brooklyn, NY
Christian Zimmerman (718) 965-7767

NYC Pks -J.J. Walker Baseball Field (Sept. '00)
Manhattan, NY
Christian Zimmerman (718) 965-7767

The Met Oval – Nike (Sept. '00)
Queens, NY
Jim Vogt (718) 752-6411

Hudson River Pk-Pier 40 In/Outdoor (Sept. '98)
Manhattan, NY
Andrea Preshley (212) 791-2530



**TESTIMONY OF FIELDTURF
DARREN GILL
DIRECTOR OF MARKETING
DGILL@FIELDTURF.COM**

My name is Darren Gill, representing FieldTurf Tarkett, the world leader in infilled artificial grass systems. Highly recognized for its patented products and installation technologies, FieldTurf is installed in more than 3,000 high profile stadiums, universities, schools and parks worldwide.

Our beloved Giants and Jets play on FieldTurf as do children and athletes at over 200 installations in New York. In the Bronx you can find FieldTurf at Cardinal Hayes High School, Fordham University and Manhattan College.

21 of 32 NFL teams either play or practice on FieldTurf.

42 Division 1-A Football programs, including the likes of Ohio State, Michigan, and Rutgers also play on FieldTurf.

FieldTurf has been given the gold standard FIFA 2 Star rating by soccer's governing body, which means that FieldTurf can be used for FIFA Final Round Competitions.

I hope that qualifies FieldTurf as the best playing surface and while it implicitly suggests playability, cost efficiency, environmental friendliness and to some end safety from physical injury, I recognize that it does not answer the very fair question of whether turf carries any health risk. A question of great importance to us as to anyone in this room.

The technology behind our artificial turf is complex – but easy to understand. Our infill contains rubber that comes from recycled tires... the same tires we

drive on every day that our kids are near every time they go inside a car for a ride or a walk down a street. The rubber makes up 20% of the FieldTurf system. FieldTurf uses only cryogenic rubber, where the tires are frozen cryogenically to minus 112 degrees and then shattered, to remove any non-rubber debris, resulting in a clean, rounded, smooth sided consistent particle. Mixed with similar sized washed silica sand this infill is layered into a synthetic carpet to deliver a system that emulates natural grass.

As we say, it looks like grass, feels like and plays like grass. Yet it's so much safer than grass.

Allow me to clear up one major issue that has been reported on recently, the issue of heavy metals, specifically lead. Lead and artificial turf have been in the news over the past year. You see, our polyethylene fibers used to contain lead chromate. FieldTurf is proud to say that our fibers are now 100% lead free. With that being said, somehow there is a belief that the crumb rubber also contains lead and other heavy metals. This is simply not the case. And by the way our older turf fiber while not lead free has been thoroughly tested and researched by many diverse constituencies, like New York City and the CPSC, and deemed safe.

There has never been one injury reported anywhere in the world, nor has an athlete or anyone else ever fallen sick as a result of inhaling, having skin contact with or by ingestion of artificial turf infill materials. In fact, studies show your Christmas day fireplace or your backyard BBQ release more volatile compounds into the atmosphere than artificial turf fields.

I understand the City Council has continually voted in favor of allocating funds for the construction of synthetic turf fields and parklands. I believe those who have approved these expenditures do so because it's a wise investment of taxpayers' money. It gets rid of the high cost of maintaining natural grass, it eliminates the need for up to one million gallons of water used each year to maintain a grass playing field and eliminates completely any use of herbicides, pesticides and fungicides – of which some 8 billion pounds are used each year to keep America's grass fields looking nice.

There are other concerns with natural grass fields as well. Each year, nearly one-million Americans report injuries sustained during recreational sports, with 82,000 involving brain injuries. Ten percent of all contact sport athletes sustain concussions yearly.

Football injuries associated with the brain occur at the rate of one in every 5.5 games. In any given season, 10% of all college players and 20% of all high school players sustain brain injuries.

A five-year independent study comparing our FieldTurf to natural grass found that our artificial grass resulted in:

- 55% fewer neural injuries
- 45% less time lost to injury (22+ days)
- 38% fewer 3rd degree injuries
- 35% less time lost to injury (1-2 days)

Inhaling is practically negligible because crumb rubber does not give off volatile products.

Direct contact with the skin does not present any real danger, even from the point of view of allergy.

Biological tests have shown the absence of genotoxicity.

In fact, crumb rubber in artificial turf makes up a miniscule amount of the tire product in our world – some 300,000,000 used tires are thrown out in America every year!

Allow me to read the conclusion from a recent report which was issued by the New York City Department of Health and Mental Hygiene titled “A Review of The Potential Health and Safety Risks from Synthetic Turf Fields Containing Crumb Rubber Infill Prepared for New York City Department of Health and Mental Hygiene”

The conclusion states that “eleven different risk assessments applied various available concentrations of Chemicals of Potential Concern (COPCs) and none identified an increased risk for human health effects as a result of ingestion, dermal or inhalation exposure to crumb rubber.”

I wish I could go through all of the studies with you... to show you all of the details. Here are two fat volumes of recent studies. Here is a 30-page bibliography outlining another couple of hundred studies.

We're proud that we've been able to sell 3,000 fields around the globe but we could only have achieved this success because we are able to satisfy ourselves and our customers and the kids, students and athletes that play on FieldTurf, that our fields are safe.

The fact is, hundreds of studies have been completed to uncover any potential risks of artificial turf.

Government health ministries and environmental bodies around the world have commissioned extensive research. So have world health organizations, leading universities and independent scientific committees, and they have all found the following:

No evidence of risk associated with tire crumb and artificial turf.

Our web site fieldturf.com allows visitors to quickly find a field that has been installed near you. I encourage you to see FieldTurf in action in the neighborhoods you serve. Touch it, feel it.

There are two important issues that also must be discussed – Heat and Alternative Infill Systems.

Artificial turf fields do get warmer than natural grass fields. However, they pale in comparison to a blacktop basketball court or your typical parking lot. More importantly, the crumb rubber used in our turf systems is not what

contributes to the majority of the heat. The major transmitter of heat is actually the grass blades. With all that being said, a solution to cool these fibers is right around the corner.

This leads me to my next point – alternative infill systems. We have an alternative infill solution that would satisfy the desires of this group today, and be more profitable to FieldTurf, but we are not convinced that product is safer and believe it compromises the longevity and in some ways the playability of the field. To be clear, we believe in the safety of crumb rubber, feel science has proven this out and invite more research. However like we have done with our turf fiber in eliminating all lead within the field's colors in response to customer concern, we are focused on identifying other infill solutions that satisfy concerns with crumb rubber, without taking away from the numerous benefits of the product."

I'm confident if you go to a FieldTurf field you'll find what millions who play on it every day enjoy – a safe, clean, artificial turf field that; helps the environment by recycling and bringing new life to used tires; by reducing the expensive maintenance; by allowing more of our kids more time to get exercise on a safe field, regardless of the weather; by reducing the incredible waste of clean water used to water grass fields; and by helping to keep some 8 billion pounds of harmful pesticides and other dangerous chemicals out of our ecosystem.

We understand the stakes here and do not discount any health concerns held by this group and their desire to do the right thing. We thank you for the opportunity to share our views and the increasingly full body of research on the subject.

I'd be happy to respond to any questions you might have. And thank you again for your time.

New York City Council
Committee on Parks and Recreation
Monday, February 9, 2009

Contact info:
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ctweedy@asphaltgreen.org

Thank you, members of the Committee, for giving me the opportunity to share with you the wonderful experience that Asphalt Green has had with synthetic turf. This experience has been so good that at this very moment we are ripping up the current Astroturf carpet to install \$750,000 of new field turf.

In the early '80's, the City decided not to bring down the asphalt plant on 90th Street and East End Avenue. It allowed the building to be converted for recreational use and for program to be operated by what was then the Neighborhood Committee for the Asphalt Plant. The adjacent lots would be used for a large athletic field. In 1982, Asphalt Green installed a grass field. In 3 years it was a mud mess. The decision was made, after careful study to lay down an Astroturf field which happened in 1985. We were one of the first synthetic field users in the City. Since that time, we had had to replace the carpet only once, in 1997, and now, 24 years after the first installation, again. Notably, we just have to replace the surface. The underlying drainage system is intact.

The use we get is incredible. We estimate that we have 80,000 scheduled visits and probably 100,000 pick-up visits. One half hour after a torrential rain we can use the field. During the summer, when we have 700 children in day camp, we desperately need this space.

As we approached the need to replace, we were guided by the Department of Parks and Recreation. They shared the available research with us. They have also been vigilant in its monitoring the safety of the site. Most recently they advised us of the need to remove the parcours, individual exercise equipment stations on the field because of splintering wood.

We evaluated vendors and reviewed the research ourselves. We could not ignore the overwhelming advantages offered by a synthetic system. The lower maintenance, a difference of \$ 335,000 over 10 years, was compelling.

Of course, cost cannot be the deciding factor. But the safety statistics – 66% reduction in neural injuries and 50% reduction in cranial/cervical injuries over natural turf is stronger data than the questionable and minimal risks in the use of synthetic turf. And there is another major risk that must be taken into account. That is the risks of child and adult obesity which are well known and are clear and present dangers. Our mission speaks right to this issue and necessitates capital development in a way that promotes maximum activity. We are dedicated to helping people of all ages, backgrounds and abilities achieve lifetime health through sports and fitness. An advisable public health policy is to allow fields which maximize use.

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