NRWA
Norwalk River Watershed Association, Inc.

PO Box 7114
Wilton, CT 06897
norwalkriver.org

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To:
Robert Stowers, Director of Recreation and Parks
Cc:
Mayor Harry Rilling
Darlene Young, Chair Recreation, Parks & Cultural Affairs
Lisa Shanahan, Chair Ad Hoc Sustainability and Resilience Committee
Tom Livingston, Council President

Re: Proposal to install additional artificial turf fields in Norwalk

Dear Mr. Stowers,

We are writing in response to a recent article in the Norwalk Hour about the city's possible plans to install three artificial turf fields at Broad River Park across from the Norwalk River and the drinking water resource, the Deering-Kellogg wellfields operated by the First Taxing District.

We write on behalf of the Norwalk River Watershed Association and its over 1000 members and participants, Copps Island Oysters, and the Mayor's Water Quality Committee in opposition to plans for artificial turf fields in Norwalk, but especially at Broad River Park, as proposed. Our concerns are as follows:

PFAS contamination. There is ample evidence, now, that all artificial turf fields contain PFAS, the "forever chemical" which persists in the environment and our bodies forever, moves easily into fresh and marine waters, and can bio-accumulate. When PFAS leaches into drinking water and the environment, it is known to harm aquatic life and to cause cancer and a host of other human health problems. The proposed site for the Broad River fields is across and up the street from the Norwalk River and the Deering-Kellogg wellfields which the First Taxing District uses to supply drinking water to Norwalk. At least one of the wells is already closed due to the presence of PFAS. Bringing more PFAS to this area poses a direct threat to Norwalk's drinking water supply and to the health of the Norwalk River and Long Island Sound. In June the EPA issued interim health advisories stating there is essentially no safe level of PFAS in drinking water.

Academic studies and real-world examples show water around turf fields quickly becomes contaminated. An example of a situation like the one Norwalk potentially faces occurred in the town of Easton, Massachusetts, where fields were installed near a drinking water source. That town is currently paying $9 million in remediation costs to address PFAS found in drinking water since the fields were installed. Kyla Bennett, a town resident and expert on this issue, is available to speak to you directly about the work required in Easton now.

The Recreation & Parks Department has reported that the company Norwalk is working with, Field Turf, claims their fields are PFAS free. This same company, however, is being sued by Portsmouth, NH for false advertising regarding its claims that its product is PFAS-free. A Portsmouth group cut off a section of the new turf that was being installed in their town, and which was advertised as being PFAS-free, and had it tested for PFAS. The tests showed a substantial presence of the chemicals. Studies from Portsmouth, NH, available in the attached PowerPoint, also show over 40ppt of 6 PFAS chemicals in a stream downgradient from the high school turf field after installation.

Professor Graham Peaslee of University of Notre Dame has conducted a study of dozens of different new and used turfgrass samples for total fluorines and found the presence of the chemicals in all of them. Each blade of grass is coated in PFAS, but also all the layers of the field contain PFAS, as well. The machines that make the fields contain PFAS. An overview of the findings is available in the attached PowerPoint. Findings include, for example, 12 ppt of 6 types of PFAS leaching off a new field in Martha's Vinyard, MA, and that amount increasing as the field ages.

Disposal costs. The presence of PFAS also makes these fields, which last 8-10 years (most warrantees are for 8 years), impossible to safely dispose of. From landfills, the PFAS will enter ground water. When incinerated, PFAS remains intact and enters the air for us to breath. Some companies claim that parts of their fields are recyclable, but there are no facilities for this in the US, and, so far, no fields in this country have been recycled.

PFAS in fields is not the only chemical problem. Most fields contain other chemical carcinogens as well as PFAS and also may contain neurotoxins and reproductive toxicants including lead, zinc, phthalates and plasticizers as well as respiratory irritants, like silica, making asthma worse. Many of these chemicals also have been shown to harm aquatic and marine life.

Turf fields shed microplastics over the course of their 8-10-year lifespan. These can be inhaled by players on the field, and they will wash into storm drains, the Norwalk River and Long Island Sound. Studies show that one field sheds 480 pounds of microplastics a year.

Extreme heat conditions are also a health hazard and contribute to urban heat island affect and climate change. Instead of absorbing carbon dioxide the way grass does, these fields release CO2, methane, and a host of other chemicals. The life of one field from manufacture to disposal generates 55.6 tons of CO2. Plastic turf absorbs solar radiation and there is no chance for evaporation, as with natural fields, so surface temperatures have been shown to reach up to

200 degrees F. On average fields are 50 degrees hotter than grass and air temperature at head height is 70 degrees hotter. Watering is used to cool the fields, so watering systems are absolutely necessary. Heat illness is the number one cause of death in high school athletes. The abrasions and 1st and 2nd degree burns from turf are some of the reasons professional athletes demand grass fields and refuse to play on turf. Using infill that is not crumb rubber will reduce the heat a little (about 5 to 10 degrees), but not as much as many companies claim. This study shows why.

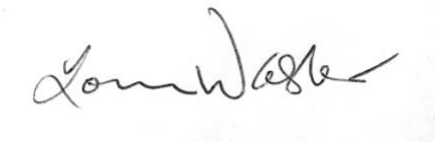
We need to hear from impartial experts on this issue. The mistake many cities have made have has been to rely on safety information from the companies selling and installing these fields. Norwalk needs to consider the many academic studies now available that measure the environmental and human health risks posed by installing fields. One place to start is this webinar by Citizens Campaign for the Environment. We should also hear from towns like Martha's Vineyard and Portsmouth NH which are disputing the safety claims these companies have made.

PFAS can enter the human body through inhalation, dermal absorption, and ingestion. These fields would threaten Norwalk athletes in all three ways. Let's listen to the US Women Soccer team and many pro football teams, which are demanding grass fields because they are safer and better to play on. Our kids deserve the best.

As a coastal city and one with thriving shellfish and fisheries industries, we also have a special responsibility to protect our rivers and Long Island Sound from these chemicals.

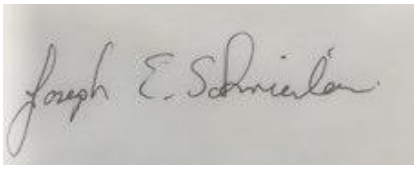
Thank you for your time and patience with this long letter. We are happy to help bring experts on the environmental and health threats of these fields to Norwalk to speak directly to you.

Sincerely,



Louise Washer, President
Norwalk River Watershed Association

Norm Bloom, Copps Island Oysters



Joseph Schneirlien, Chair
Mayor's Water Quality Committee