

From: [Janet Way](#)
To: [City Council](#)
Cc: [Jessica Simulcik Smith](#); [Debbie Tarry](#); [Knoll D. Lowney](#)
Subject: Risk of Crumb Rubber to the Public on Shoreline Sports Fields
Date: Monday, May 15, 2017 7:44:06 AM
Attachments: [Artificial Turf Proposal - Council Letter.docx](#)

Please read attached letter or pasted document letter below per tonite's meeting.

Thank you.

Janet Way
Shoreline Preservation Society

November 30, 2016

Shoreline City Council
17500 Midvale Ave N
Shoreline, WA 98133

Subject: Twin Ponds Artificial Turf Replacement Proposal

Dear Mayor and Council:

We are writing today to express our concern about the Crumb Rubber Artificial Turf recommended to you by staff at Twin Ponds Park. As you know, the Shoreline Parks Board has now voted unanimously TWICE to reject the crumb rubber infill.

We believe there is high risk of the potential for environmental impact and upon the health and safety of our community, especially for children. Therefor we recommend that Council should reject the current proposal and bid process and direct staff to undertake an EIS to study the real impacts, not simply an “environmental assessment”, as has been conducted thus far. Our citizens should not have to rely on a Peer Review Study from a neighboring school district when it comes to the health and safety of our Parks. Especially when so many other nearby cities and school districts are taking a more cautious approach and imposing moratoriums on Crumb Rubber and installing infill that is considered safer, such as cork. Your staff report only mentions “noise” in its study of environmental impacts. This is entirely inadequate due to the toxic nature of the Crumb Rubber.

We believe there is a likelihood of severe harm adverse impacts to the environment potentially from this proposal which cannot be mitigated. The Shoreline Preservation Society is a local non-profit with a record of advocacy for our local environment, especially when it comes to our watersheds and public health and wellbeing. We request Party of Record status with Legal Standing.

There are two areas of concern that we are highlighting.

*** Environmental Health and Safety Hazards and Environmental impacts to the Critical Area.**

*** Twin Ponds field is located largely within an ECA (Environmentally Critical Area) and buffer.**

As the Shoreline Parks Board, you are charged with strenuously protecting these critical areas in our parks. The Parks Department recently delineated the wetlands at Twin Ponds Park area in conjunction with the recently passed Light Rail Station Area Rezones. Twin Ponds is a part of the Thornton Creek Watershed and is habitat for salmonids. Thornton Creek is habitat to 5 species of salmon and numerous other animals and birds which depend on fish and water quality.

file:///C:/Users/Alan/Desktop/janet/Twin_Ponds_Wtld_Delin_Rpt_7-29-16.pdf

The Crumb Rubber contains many hazardous chemicals, including Zinc which is toxic to fish and other aquatic life. In fact, rubber tires and their derivatives such as Crumb Rubber are considered a “HAZARDOUS WASTE” by the State of Washington.

<http://www.ecy.wa.gov/programs/swfa/tires/>

What means are there in this proposal to contain the runoff containing particles of Crumb Rubber and keep them from flowing into the wetland and creek? We have no information in this staff report thus far to address this issue.

The extreme heat generated by these crumb rubber fields is another important factor regarding impacts to the Critical Area. Temperatures measured in the summer at the Crumb Rubber Field Turf at Kellogg Middle School were at 140 degrees F. The runoff from that heated area into the wetland and creek is very damaging to aquatic life, particularly salmonids. (We will discuss the impacts of this heat affect on the soccer players later as well.)

These two issues alone, extreme heat and toxic chemicals should be enough to trigger a SEPA process, which is why we are requesting an EIS.

*** Environmental Health and Safety Hazards**

There is more than enough credible information and data that supports reasons for concern about replacing the current Crumb Rubber Turf with more of the same.

We should not be using our children as “guinea pigs” in our City owned facilities when there as readily available safer alternatives that are affordable.

There were 96 different chemicals found in Crumb Rubber in a Yale University Study published in 2015. Approximately 20% were considered to be carcinogenic. It is discussed in an article in Southlakes Turf entitled

“New Study – Many Carcinogens Found in Yale Analysis of Crumb Rubber Infill & Playground Mulch Surfacing”

<http://southlaketurf.org/?p=78>

Gaboury Benoit, Ph.D., Yale Professor of Environmental Chemistry and Engineering and lead investigator of the study said, “Not surprisingly, the shredded tires contain a veritable witches brew of toxic substances. It seems irresponsible to market a hazardous waste as a consumer product.”

There have been alarming rates of cancer reported among soccer players, both professional and amateur, particularly among goalies who inhale and ingest the dust from the crumb rubber at the highest rates. According to new research done there is up to 1000 times higher cancer risk than “normal” with the combined effects of the carcinogens in crumb rubber fields.

There are concerns about many health aspects impacted by these crumb rubber fields, including asthma, injuries, cuts and abrasions, and even staph infections have been documented.

<http://www.synturf.org/staphnews.html>

The extreme heat generated on these crumb rubber fields is yet another serious health concern.

Locally, at Kellogg Middle School a field temperature was measured during the summer to be 140 degrees F! That temperature is clearly too hot for children and young adults to be safe on these fields.

And the volatility of the crumb rubber dust at these temperatures must also be an additional concern.

One of the youth members on the Parks Board stated that she never plays on those fields in the summer because of the extreme heat. She also complained about the smelly crumb rubber getting stuck in her hair and clothing during play to such a great extent that it was hard to wash out.

There are many, many articles and news stories published in the last few years detailing health concerns of utilizing crumb rubber, particularly for use by children.

This is a digest listing many of those:

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Here is a news broadcast on NBC Nightly News from last year and another on Health Hazards:

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In your staff report, you've utilized a "peer review" by Industry specialist Elisabeth Black. While she dismisses many potential hazards (which a reasonable person would consider cause for concern), even she admits that the Carbon Black substance, which makes up a large portion of the material is a potentially dangerous substance. Possibly carcinogenic. She also admits that there is Lead present, and the recent concerns nationwide of lead being present in drinking water clarify that no level of lead is considered safe for children.

*** Other Alternatives to Crumb Rubber:**

There are numerous alternatives to replacing the current field with the same material such as, coconut, cork, sand, coated rubber and others. The City of Seattle Parks Department elected to use a cork alternative at the Cal Anderson Park. (see photo from Earth Day 2017)

<http://www.capitolhillseattle.com/2016/05/cal-andersons-bobby-morris-rubber-crumb-turf-to-be-replaced-by-new-cork-alternative/>

Other cities and school districts across the country are electing to take a more cautious

approach, in order to protect the health of children using these fields. Los Angeles and other cities, including Kirkland are either using alternatives or moratorium to take a cautious approach.

Staff has asked you to simply comply with their recommendations stating “The board is requested to concur” and approve the Styrene Butadiene Rubber (SRB) crumb rubber for \$1.6 MILLION utilizing state and other grant monies without further ado.

We recommend a more thoughtful process including directing staff to recommend an EIS to truly ascertain the environmental impacts of replacing the material with new Crumb Rubber fill. We suggest that both the Hippocratic Oath (“First, do no harm.”) and the Precautionary Principle should be applied in this case.

<http://sehn.org/precautionary-principle/>

“The Science and Environmental Health Network is working to implement the precautionary principle as a basis for environmental and public health policy. The principle and the main components of its implementation are stated this way in the 1998 Wingspread Statement on the Precautionary Principle:

“When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically. In this context the proponent of an activity, rather than the public, should bear the burden of proof. The process of applying the precautionary principle must be open, informed and democratic and must include potentially affected parties. It must also involve an examination of the full range of alternatives, including no action.” – [Wingspread Statement on the Precautionary Principle](#), Jan. 1998

The precautionary principle, virtually unknown here six years ago, is now a U.S. phenomenon. In December 2001 the [New York Times Magazine](#) listed the principle as one of the most influential ideas of the year, describing the intellectual, ethical, and policy framework SEHN had developed around the principle.

In June 2003, the Board of Supervisors of the City and County of San Francisco became the first government body in the United States to make the precautionary principle the basis for all its [environmental policy](#).

Read [Frequently Asked Questions](#) for a quick overview of the precautionary principle or this

[White Paper](#) for full background.

Understanding the Role of Science in Regulation. The Wingspread Statement and the European Union in [Environmental Health Perspectives](#) Volume 117 Number 3 March 2009.

We suggest that you the Shoreline City Council take the time needed to fully analyze this proposal and delay a decision if you need more information, if necessary. Please consider other alternatives that will be safer and better for our environment. Crumb Rubber is a hazardous material and should not be utilized as a play surface for our children and has a toxic history that would endanger wildlife and our rights to clean water.

We ask to be kept informed of any and all meetings and notices planned in this matter.

We thank you for your attention and service.

Respectfully Submitted,

Janet Way, President

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