From:	laura johnson
To:	City Council
Subject:	Twin Ponds Field Replacement- PLEASE DO NOT USE WASTE TIRES AS INFILL
Date:	Monday, May 15, 2017 10:04:54 AM

Shoreline City Council Members, Mayor, and Deputy Mayor,

Two years ago a group of concerned parents started Washington Alliance for Non-toxic Pay and Athletic Fields. Ever since I have been advocating for safer athletic fields for my family and our community. My son loves field sports and although I personally prefer grass, I would consider it a win to have turf fields without the waste tire crumb rubber infill available.

There is no dispute that tires contain toxins- including a number of known carcinogens, reprotoxins, and neurotoxins. The only debate is over the bioavailability of the chemicals. These chemicals are absorbed into bodies during normal play through dermal contact, they are sometimes embedded in wounds, swallowed during play, and inhaled as a microscopic dust. This video by Dr. Stuart Shalet, an expert on pollution and its effect on children's health and Director of the Division of Environmental Health for the School of Public Health at Georgia State University, gives a detailed explanation on turf inhalation and particles.

The science is far from settled and there are a number of reasons waste tires are not a good choice for our children to play on. Only the industry which gains financially from your use of these fields has paid consultants to conclude safety assurances. It is worth pointing out that despite industry assurances, no government agency has concluded that playing on crumb rubber is safe - not the EPA, CPSC, CDC. In fact, these agencies advise players to take precautions when playing on crumb rubber, including:

avoid mouth contact with playground surfacing materials

clean hands and other areas of exposed skin after visiting the playground

avoid eating food or drinking beverages while directly on playground surfaces

wash hands before handling food

consider changing clothes if evidence of tire materials (*e.g.*, black marks or dust) is visible on fabrics

clean any toys that were used on a playground after the visit limit the time at a playground on extremely hot days.

What if we looked to the health effects researchers for advice? They are the epidemiologists, endocrinologists, and other prevention-based fields whose main interest is in preventing and treating disease. These professionals are calling for caution with the use of crumb rubber-especially around children. The American Academy of Pediatrics has stated that ”there are large data gaps in our knowledge of the precise health effects of playing on these surface” and Mt. Sinai Children’s Environmental Health Center states that “given the hazards associated with recycled rubber, it is our recommendation that these products never be used as surfaces where children play.” Barry Boyd, MD: Clinical Professor of Medicine, Yale University School of Medicine, Oncologist at Greenwich Hospital and Affiliate Member of the Yale Cancer Center, warned that “because artificial turf playing fields are disproportionately used by children and adolescents, these childhood exposures to environmental carcinogens may add to the lifelong risk of cancer.”

A growing number of communities around us are choosing not to use the waste tire materials. Seattle Parks and Rec and Seattle Public Schools are moving away from its use. Edmonds just renewed their moratorium on the use of crumb rubber. Shoreline Parks and Rec voted unanimously to recommend alternatives. South Kitsap, Vashon Island, Anacortes, Mercer Island, and Lakewood High Schools, as well as the City of Kenmore, are all choosing not to use waste tires as infill. All around the country schools are moving away from the use of waste tires on athletic fields and playgrounds. Currently, the Minnesota State Legislature is moving to establish a statewide moratorium on the use of waste tires on new parks, fields, and playgrounds, and requiring advisory signage on current fields and playgrounds as a way to educate users on steps to reduce exposure. The state of Connecticut is also moving forward similar legislation.

Some municipalities currently utilizing crumb rubber are beginning to set aside funds for its removal. In April of 2017, the Minneapolis School District took steps to set aside 3.2 million dollars to remove and replace the tire mulch from all 47 of its playgrounds. In May of 2017 Scott Valley Unified School District, in California voted 4-1 in favor of removing crumb rubber mulch from playgrounds, citing lack of comprehensive studies required to answer growing parental concern. may have a different look and feel as soon as the next school year as part of the district’s response to parents concerned about the materials currently in use under the playground equipment.

In April of 2017, the Minneapolis City Council members stated, “that they are now clearly on

record affirming that the potential health risks to people, especially young children, who are exposed to the chemicals in tires on fields and playgrounds are undeniable." And these are just the local municipalities. All around the country schools, Parks and Recreation Departments, City Councils are moving away from the use of waste tires on athletic fields and playgrounds. They are beginning to ask "Do we continue to push for an outdated product with a number of concerns, or do we advocate for safer infill options?" The Huffington Post did an investigative report on how many school districts and cities are abandoning plans to install crumb rubber fields.

In your information packet from staff, you received a study done for ESD/Verdant from Gradient, Corp. A little bit of background on Gradient and the lead for the study, Michael Peterson: In Washington State's 2016 legislative session there was a bill related to crumb rubber and some of the strongest lobbying against legislative protection came from Michael Peterson, a regulatory toxicologist with Gradient Corp. Peterson was in Olympia representing the Recycled Rubber Council, for which he is also a paid adviser. According to Richard Clapp, professor of environmental health at Boston University's School of Public Health, "Gradient's game is product defense. Its services include promoting industry positions in op-eds, providing expert testimony in court, legislative, and regulatory proceedings, and issuing scientific reports…. They wind up defending people who are worried about liability," Clapp says, "although they would say they're there to make sure that there's sound science behind whatever regulatory steps or litigation happens in this country." Gradient is the main focus in the recent series by The Center for Public Integrity titled: "Science for Sale." Gradient Corp. defended Fieldturf in California when their product was found to contain unsafe levels of lead. Gradient has also represented tobacco companies for decades.

Lately, there has been speculation about the Washington State DOH study, which took a list from UW Women's Soccer coach Amy Griffin and compared it against state cancer registry. The study took a list of 35 players with cancer on a list gathered by one soccer coach and, with no additional outreach beyond this one coach of mostly 16-20 something-year-olds, compared it to the entire state's registry of those 6 to mid-20's on the registry and concluded no increase in cancer from playing soccer. The problem is that the primary premise is false, that Amy's List encompasses every soccer player diagnosed with cancer who played on turf fields. They admit that the list likely did not include all of the cases. They did NOT contact families on the Cancer Registry to inquire about sports activities and they did NOT contact soccer families from the WA Youth Soccer Association to verify a number of players in WA

State. Also, they also didn't test a single field.

Besides the toxic risk of the waste tires mix, there are other safety reasons not to choose crumb rubber. Crumb rubber increases heat illness risk during the high-use summer months. Crumb rubber absorbs heat, so the temperature of the fields are much higher than the surrounding air temperature. According to a BYU study, an 80-85°F day can result in temperatures of 120-146°F. This type of increase can add to the risk of heat-related illness during warm summer months. Using alternative infill materials, which do not absorb heat, can lessen the increase and thereby reduce the risk of heat illness, plus allow the fields to be used more during the warm summer months. There is also the environmental concern that the heavy metals in the chemical makeup of the crumb rubber could leach into groundwater, streams, and other bodies of water. and harm aquatic life.

Knowing all of this my family avoids fields with crumb rubber and my son's access to field sports has been drastically reduced since the majority of surrounding fields are crumb rubber. I have hope though that by the time he is in high school the trend towards precaution and alternative infills will continue and that locally we will have safer choices. I do not take my volunteer advocacy work on this issue lightly- I fully understand that the choices that we make on this will likely affect the health of thousands of children.

Your Parks and Recreation Board has seriously considered this matter and voted unanimously- twice- against the use of any recycled rubber infill. I would appreciate the opportunity to meet in person and discuss this issue further. Since time is of the essence with this decision, I will give you a follow-up call to see about setting up a meeting for next week.

Thank you for your serious consideration on this matter,

Laura Johnson