

From: [Dan Jacoby](#)
To: [City Council](#)
Subject: Letter on tonight's agenda item 8a
Date: Monday, May 15, 2017 3:57:25 PM
Attachments: [Comment_CrumbRubber_170512.docx](#)

Please find attached my letter on the question of using crumb rubber in our parks.
Thank you,
Dan Jacoby

To the Council:

I am writing in support of the PRCS/Tree Board recommendation that the city not use SBR, aka “crumb rubber,” in any fields.

First, I would like to note that the referenced Washington State Department of Health (WADoH) report does not, as the staff report claims, state that crumb rubber “has been deemed safe to use,” but rather that WADoH simply didn’t look for evidence that it was unsafe. This refusal to look was based on the conclusion that despite the apparent cluster of a range of cancers among people playing soccer in fields with crumb rubber there was no point in looking further.

This was a seriously flawed conclusion, based on a flawed assumption, specifically that different, though related, types of cancer should not be grouped together. Had WADoH properly grouped similar types of cancer, the data would have shown a sufficient clustering to support further investigation.

Second, while correlation does not necessarily imply causation, there is good reason to believe that the carcinogenic agents in crumb rubber are a direct cause of cancer clusters. Also, there is a major reason why crumb rubber is so much more threatening than tires – the surface to volume ratio.

There is a certain amount of surface on a tire. Grind that tire up into tiny little pieces, and the surface area expands exponentially. All that extra surface area means that much more likelihood of carcinogens leaching out of the rubber into people’s bodies. The amount of exposure, therefore, is several orders of magnitude higher for crumb rubber than it is for tires.

Furthermore, tires are coated with a release lubricant on their surface before being sent to market; there is no such coating on the vast majority of the surface of the crumb rubber pieces.

I remember having a tire swing as a child. Sometimes I used a tire as a floatation device on a lake when growing up. In both situations my face was near the tire and my body (as I was wearing nothing but swimming trunks) was directly exposed to the rubber. And I wasn’t alone; millions of children had similar experiences. But because of the surface to volume ratio and the coating, the level of exposure I had to the carcinogenic chemicals in tires was miniscule when compared with exposure levels for even fully clothed children playing on crumb rubber fields.

Is it possible that crumb rubber is safe? I cannot rule it out. But is it worth taking the chance with the lives of our city’s children to find out? Absolutely not. I urge you to ban crumb rubber from our city’s fields until and unless it is proven to be safe.

Thank you,
Dan Jacoby