Norwalk River Watershed Association, Inc.

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norwalkriver.org

February 13, 2023

To: Lynne Vanderslice, First Selectman

Cc: Selectmen Joshua Cole, Kimberley Healy, Basam Nabulsi, and Ross Tartell
Director Environmental Affairs, Mike Conklin
Conservation Commissioners Jackie Algon, Sadiqua Azad, Jeff Lapnow, Colleen O'Brien, David Silvia
Inland Wetlands Chair, Rick Stow
Director of Parks & Recreation, Steve Pierce

Re: Request for independent environmental and public health risk assessment of proposal to install artificial turf field at Allens Meadows

Dear Lynne,

I write on behalf of the Norwalk River Watershed Association and its over 2000 members and participants to request that before the town votes to add an artificial turf field at Allens Meadows, it conducts a risk assessment and public information session and discussion that addresses the known threats to the environment and drinking water posed by the many harmful chemicals and toxins, including micro-plastics and PFAS "forever chemicals," documented to be present in turf fields, including those without crumb rubber infills.

While we understand that the town has identified the need for a new playing field with a dome, we are concerned that the public and town officials may not be aware of the health hazards associated with installing artificial turf fields, especially so close to the Norwalk River and directly over an aquifer identified by the State as future drinking water for the town.

Our concerns are best presented in this recent webinar by health experts (skip the intro). We have also listed some of them here:

PFAS contamination. There is evidence, now, that **all** artificial turf fields contain PFAS, the "forever chemical" which persists forever and bio-accumulates in the environment and our bodies and moves easily into fresh and marine waters (see attached Powerpoint from Notre Dame). 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 (CDC report outlining health risks). The proposed site for this field, Allens Meadows, is roughly 300 yards from the Norwalk River and is bisected by Goetzen Brook which drains into the river. Allens is also situated over an aquifer designated as future drinking water. In Norwalk, three drinking water wells operated by the First Taxing District water company are already

closed due to the presence of PFAS, so this is a real and present threat in our watershed. Baseline testing of the waters in and around Allens conducted by NRWA through a certified lab shows that several PFAS chemicals are already present in the Norwalk River and Goetzen Brook, but at small levels. Protecting this area from additional PFAS contamination is important for protecting public health and our fish and wildlife populations as well as property values, potentially, of homes that rely on well water. 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 Wilton 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, and will be a speaker at our March 1st webinar, *The Hazards of Artificial Turf.* Connecticut Water, one of the State's largest providers, is suing 3M and other manufacturers of PFAS to recover costs needed for removing PFAS from drinking water. Senate Bill 100, this legislative session, provides funding to municipalities for PFAS testing and remediation. Cleanup of PFAS will fall to the town, so we need to be careful about adding it to our environment.

Field Turf, one of the largest suppliers, 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 (contained in PFAS chemicals) and found the presence of these chemical elements 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.

The Norwalk River feeds into the Sound at the epicenter of Connecticut's $30 million shellfish industry. We have a responsibility to protect the seafood that benefits our community. In Florida, oysters have been found to be contaminated with PFAS, and here in our watershed, the Norwalk Shellfish Commission is extremely concerned about the threat posed by PFAS.

Disposal costs. The presence of PFAS also makes Turf 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 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.

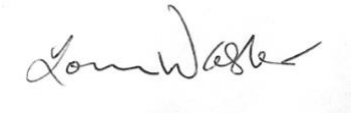
Extreme heat conditions are also a health hazard and contribute to urban heat island affect and climate change. Instead of absorbing carbon dioxide the way grass does, these fields release CO2, methane, and a host of other chemicals. The life of one field from manufacture to disposal generates 55.6 tons 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 towns have made has been to rely on safety information from the companies selling and installing these fields. Wilton 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 mentioned above 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. Please join the webinar NRWA is hosting on this issue on March 1 at 6:30PM—Register Here.

PFAS can enter the human body through inhalation, dermal absorption, and ingestion. These fields would threaten Wilton athletes in all three ways. Let's listen to the US Women's 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.

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 Wilton to speak directly to you and to answer the public's questions. We hope you will join the webinar March 1 here.

Sincerely,



Louise Washer, President
Norwalk River Watershed Association