

Dear Honorable Selectmen, Selectwomen and Board of Education Members of North Haven,

I understand that you are considering installing an artificial turf field composed of infill made with recycled tire rubber or crumb rubber. As the Connecticut Director for Clean Water Action (CWA) and the Coordinator of the Coalition for a Safe and Healthy CT (Coalition), I strongly urge you to consider other options. CWA and the Coalition have worked for many years to raise awareness on the scientific evidence linking exposure to recycled tire rubber mulch in fields and playgrounds with serious health impacts and are deeply concerned about the presence of highly toxic chemicals in recycled tire rubber that very likely contributes to an exposure hazard for children and young adults that play on these fields. I write to strongly urge you consider safer alternatives and offer the following reasons.

1) The potential risks of exposure to toxic chemicals outweigh the benefits of recycled tire rubber turf.

Tires contain numerous chemicals known to cause cancer, including benzene and butadiene. Tires also pick up numerous hazardous chemicals as they travel across roads, including heavy metals that are often neurotoxic and polyaromatic hydrocarbons (PAHs) that are linked to cancers. Research conducted on exposure to these chemicals from playing on turf have not been sufficiently designed to determine all risks of exposure. Children and young adults playing on these fields may be exposed to highly toxic chemicals through inhalation, ingestion and absorption through the skin. The brains and nervous systems of children and young adults eighteen years of age and younger are still developing and remain at higher risk than adults for health impacts associated with exposure to toxic chemicals. The recent TENDR report documents that 1 in 6 children in the U.S. have neurobehavioral developmental disorders and determined that this "silent, global pandemic" is cause for alarm and actions to reduce environmental exposure are urgently needed. CWA and the Coalition believe that a shift in how we evaluate risk to children is warranted in this context when we know hundreds of toxic chemicals exist in recycled rubber tire turf. While artificial turf offers many benefits, particularly for those fields that get a lot of active use, town officials should consider the long-term benefits versus the risks of exposure and potential health impacts to children and young adults, particularly when safer alternatives exist.

2) The federal government recognizes gaps in the scientific research and is concerned enough to conduct a federal study.

The U.S. Environmental Protection Agency (EPA) recognized the potential risks of exposure and gaps in scientific research and is currently studying the health impacts of exposure from playing on these fields. Knowing this to be the case, installation of a recycled tire rubber field before the reported outcome of this study is premature and should not occur.

3) Recycled tire rubber fields are costly and not maintenance-free

¹ https://www.epa.gov/chemical-research/federal-research-recycled-tire-crumb-used-playing-fields

Artificial turf fields made with recycled tire rubber are expensive to purchase, install and reported to last 8-10 years, though this varies widely depending on the frequency and type of use. They require routine watering to keep the temperature of the turf at a safe level, particularly on hot summer days when temperatures on these fields can exceed 160 degrees Fahrenheit. Recycled tire rubber fields also are subject to tears, rips and holes which must be repaired both to ensure safety and to reduce exposure to the tire rubber infill. At the end of life, towns will incur significant removal and disposal costs as the material, just like tires, is not suitable to be put in landfills. These costs should be factored in to the overall decision when weighing pros and cons of artificial turf.

4) Safer alternatives exist

Many safe options exist for artificial turf fields and should be considered, including those that are made with coconut fiber and cork. These safer alternative fields do not contain toxic chemicals, provide the benefits of an artificial turf field, can alleviate fears of concerned parents and residents and will likely cost less to dispose of at the end of their useful life.

I'm sure you have heard many opinions both opposing and supporting the installation of recycled tire rubber turf. I hope the information provided is helpful and I am happy to answer any questions. As a nurse, with years of experience in environmental health, I urge you to adopt a precautionary approach, as called for in the TENDR report, and hope that you will consider alternatives for your town's fields.

Sincerely,

Anne Hulick, RN, MS, JD

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