

General Turf Talking Points

Specific DOE items in red

Synthetic Turf (General):

- In 2008, we engaged with PUC staff regarding synthetic turf when three of their staff (Paula Kehoe, Eleen Levin and Arleen Navarret) were on the task force as subject matter experts as it related to PUC input on synthetic turf. (task force report attached)

Worked closely with Chris Gieger at DOE on specification requirements on toxic reduction goals. He was also a member on the task force.

- RPD worked with PUC staff on several projects that sit over the west side aquifer to address any storm drainage concerns related to synthetic turf by installing a dual drainage system separated by an impermeable membrane to address any potential public concerns about groundwater.* This was at South Sunset and Beach Chalet. Currently all water is collected and sent to the west side treatment plan for processing, similar to all stormwater.*

Note [1]

Note [2]

- In 2010, RPD staff worked with PUC team members (Jeff Gilman) to complete a synthetic turf monitoring plan to examine and test storm water that passed through our two of our fields. We conducted this exercise at South Sunset and Garfield Square. (monitoring plan and test results attached)*

Note [3]

- This past winter, PUC conducted stormwater testing at two of our park facilities (Beach Chalet and Minnie Lovie). Test results haven't been shared yet but draft comment is that the results don't show issues of concern.* Need to engage with them to get a more formal response. PUC plans to conduct additional testing this coming winter. Sites have not been determined/communicated yet.

Note [4]

- Staff continued to work with PUC staff (Jeff Gilman) on the evolving development of our synthetic turf procurement specs.* Requested feedback on testing protocols for organic infill options when they first came to market.

Note [5]

- We work with PUC stormwater team members to make sure our synthetic turf projects meet the PUC storm water ordinance requirements.*

Note [6]

- RPD has been working with a third part environmental consultant on the initial development of our turf procurement specifications and update the specifications prior to each project to make sure it's up to date with current state and federal testing protocols.
- RPD agreed to participate in the State's OEHHA study which just published a draft in July of this year. The state selected independent/ blind sites across the state to

examine SBR (tire crumb infill material). Not sure if San Francisco sites were part of their study. See attached link to study with findings that SBR is not a risk to public or environment. <https://oehha.ca.gov/sites/default/files/media/2025-03/DraftTurfReport031325.pdf> *

Note [7]

• The Department has one of most stringent turf procurement specifications based on feedback from turf companies. (specification attached for reference). Our turf purchases meet these requirements. *

Note [8]

• We just tested playground turf with a more robust PFAS testing requirement and the turf passed.* We are in the process of testing our athletic turf project against this new specification. (see playground turf test results)

Note [9]

Recycling-

We've been working with DOE Zero Waste Team on recycling options and requirements for turf. Our specs require that turf company recycle the turf and don't send to landfill or burn for energy. Working with James Slatter (C&D Zero Waste Sr. Coordinator) and Christopher Lester and Eric Pasewalk of their team.

I just visited Fieldturf's first phase of their recycling process (Kimbell Field) which is up in Portland. Second phase of recycling goes to north California for second phase of recycling (down cycling)* to a company called Circular Polymer.* Below is information from Circular Polymer and the organizations that endorse their operation

Note [10]

Note [11]

Dan,

I would like to invite you to Circular Polymers to witness the recycling of Field Turf.

Circular Polymers is a leader in recycling carpet. Field Turf is simply outdoor carpet.

Our patented proprietary technology converts carpet (field turf) waste into a raw material for the circular economy.

Below is a link to a 6-minute video on our process. Our plant is located in Lincoln, California.

https://www.youtube.com/watch?v=voJTqIn_4xU

I encourage you to reach out to others who have vetted our company and process: Cal Recycle, National Stewardship Action Council (NSAC), California Product Stewardship Council (CPSC), Carpet America Recovery Effort.

As Heidi Sandborn, the Executive Director of NSAC and Doug Kobald, the Executive Director of CPSC are extremely well known and trusted environmental organizations, I can provide you their contact information if you wish to contact them as a reference.

I encourage you to see the process for yourself. We are 2 hours from SF without traffic.

I have included recognition we have received below.

We look forward to having you witness the recycling for yourself.

Notes from Keep Crocker Real

1. PUC memo confirms rainwater falling on Minnie & Lovie Ward and Beach Chalet fields is diverted to sewer. Extensive rainwater catchment system is planned for Crocker Amazon ballfields.

PUC memo: "Because drinking water standards were exceeded in samples collected four or more years after the synthetic turf was installed, these fields may provide an ongoing contaminant source as a result of degradation of the turf materials."

2. "Currently all water is collected and sent to the westside treatment plan [sic] for processing, similar to all stormwater."

False. Stormwater on natural grass fields is not diverted to the sewer, it soaks into the soil.

3. Report is missing a dataset released in a database export (LIMS). LIMS data showed toxin levels exceeding EPA and CA thresholds.

4. The results showed unacceptable levels of Antimony, Chromium, Copper, Nickel and Zinc. Did not test for PFAS or 6PPD. Did not quantify microplastics in runoff.

5. The specification of the turf requirements appears to be copied from the description of the turf they plan to purchase.

6. The projects FAIL to meet PUC stormwater requirements. See "Draft memo on SF policy synthetic turf drainage and GW quality protection 190919.pdf", pages 2-3, A-5, A-6, B3-4, Tables B3, B4.

7. This mischaracterizes the study's findings. The study concludes exposure to artificial turf field-related chemicals (in "worst-case scenarios") can cause:

- developmental and reproductive toxicity for athletes aged 11 to 70 years
- chronic toxicity in spectators of 0 to 2 years old
- excess cancer risk in infant spectators and athletes 16 to 30 years

The management of SF Rec and Park may be comfortable with those risks, but they do not have the right to inflict exposure on us.

8. The document we have seen included recycling requirements. These requirements were NOT met in 2017 when 27,008 pounds of turf removed from Franklin Square were shipped to Malaysia. The RPD requires documentation from its turf vendors when turf is removed. We have asked for the documentation from all field replacement projects to date.

9. They used EPA Method 1633 to test for 40 of the approximately 17,000 PFAS chemicals. There is a newer test (EPA Method 1621) that indicates the presence of PFAS chemicals without directly testing for individual compounds. The EPA says Method 1621 is an effective screening method for PFAS. We would like to see RPD use this test.

10. Acknowledges that the artificial turf is not recycled.

11. Joanne Brasch, Director of Advocacy at the California Product Stewardship Council, stated in an email that: "Circular Polymers is a collector, sorter, and pre-processor; they do not actually recycle."