



January 21, 2015

VIA EMAIL

Los Angeles City Council
Committee on Energy & the Environment

Re: OPPOSE Synthetic Turfs Motion (introduced 11/05/2014) — File No. 14-1197-S1

Dear Los Angeles City Council/Energy & Environment Committee:

On behalf of Seventh Generation Advisors, an environmental nonprofit organization working in Los Angeles and worldwide towards a sustainable world seven generations into the future, we do not support the motion to study artificial turf. We strongly support LA City Council's encouragement of ways for homeowners to address California's drought, but we believe that specifically encouraging the use of Astroturf is an "out-of-the-frying-pan-into-the-fire" approach. We would ask Los Angeles City Council to instead more broadly encourage the use of native plants, and other more ecologically permeable, less toxic ground-cover materials.

GROUNDWATER RECHARGE

While some forms of artificial grass are permeable, as a building material there is a risk that Astroturf may be easily "knocked off" by commercial producers and/or misused by consumers to be impermeable and thereby exacerbate the problems of groundwater recharge (and drought). It will be difficult for consumers to distinguish permeability qualities (especially if less permeable Astroturf is cheaper), and it will be difficult to guide correct installation necessary to accomplish groundwater recharge (best done with layers below the artificial grass). Since groundwater resources play a vital role in maintaining economic and environmental sustainability, it is a dangerous gamble to study (for the sake of encouraging) the use of a single type of consumer product that carries the risk of adding to drought issues--especially since low-cost alternative groundcover is currently available, and carries no such risk. During an average year, California's 515 alluvial groundwater basins and subbasins contribute approximately 38 percent toward the State's total water supply. During dry years, groundwater contributes up to 46 percent (or more) of the statewide annual supply, and serves as a critical buffer against the impacts of drought and climate change. A close assessment of all the basin priorities, including those connected to or in Los Angeles City boundaries, is not likely until after alluvial groundwater basin boundaries are updated in 2016.

INCREASED RUNOFF

Moreover, Astroturf could potentially create additional storm water runoff. Impermeable surfaces increase the risk of flooding and pollution, as the Los Angeles Bureau of Sanitation so well knows. Reducing the volume of storm water runoff is a big impetus

behind many regional and state regulations for low-impact new development. Los Angeles City has worked hard towards decreasing impermeable surfaces that create storm water runoff and pollution. As esteemed Councilmember LaBonge himself knows, public sentiment has moved towards un-armoring and un-paving natural systems like the Los Angeles River. Encouraging Astroturf, however well intended, will only move Los Angeles backward.

MICROPLASTIC CONCERNS

Whether or not Astroturf decreases groundwater recharge and/or increases storm water runoff, it is certain that over time, there will be shedding of plastic Astroturf material into runoff; who has not seen children covered with green plastic particles after playing on artificial turf? Los Angeles City has seen fit to pass many plastic source reduction measures, including most recently a plastic bag ban. To therefore encourage the use of a specific material that adds plastic micro-particles to storm water is regressive and irresponsible.

Even discounting runoff, it would be wise for the committee to review non-industry sponsored studies assuring that human ingestion and inhalation of such plastic microfibers is not harmful, especially since studies increasingly demonstrate endocrine disruption and animal and potential human health impacts from chemicals in micro-plastics. If such studies are not available, then we would encourage the Council to adopt the precautionary principle, given that living, native, affordable, non-toxic alternative groundcover exists.

In sum, with so many deleterious potential impacts, a study on Astroturf is the wrong tactic to use for Los Angeles's drought issues. Astroturf can be available as a consumer product, just without taxpayer dollars going to study it.

Sincerely,



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