clerk CIS <clerk.cis@lacity.org>

Your Community Impact Statement Submittal - Council File Number: 24-0602

1 message

LA City SNow <cityoflaprod@service-now.com> Thu, Jun 19, 2025 at 1:38 PM
Reply-To: LA City SNow <cityoflaprod@service-now.com>
To: Clerk.CIS@lacity.org, melanie.labrecque@yahoo.com

A Neighborhood Council Community Impact Statement (CIS) has been successfully submitted to your Commission or City Council. We provided information below about CISs and attached a copy of the CIS.

We encourage you to reach out to the Community Impact Statement Filer to acknowledge receipt and if this Community Impact Statement will be scheduled at a future meeting. Neighborhood Council board members are volunteers and it would be helpful if they received confirmation that you received their CIS.

The CIS process was enable by the to Los Angeles Administrative Code §Section 22.819. It provides that, "a Neighborhood Council may take a formal position on a matter by way of a Community Impact Statement (CIS) or written resolution." NCs representatives also testify before City Boards and Commissions on the item related to their CIS. If the Neighborhood Council chooses to do so, the Neighborhood Council representative must provide the Commission with a copy of the CIS or rResolution sufficiently in advance for review, possible inclusion on the agenda, and posting on the Commission's website.Any information you can provide related to your agenda setting schedule is helpful to share with the NC.

If the CIS or resolution pertains to a matter *listed on the Commission's agenda*, during the time the matter is heard, the designated Neighborhood Council representative should be given an opportunity to present the Neighborhood Council's formal position. We encourage becoming familiar with the City Councils rules on the subject. At the Chair's discretion, the Neighborhood Council representative may be asked to have a seat at the table (or equivalent for a virtual meeting) typically reserved for City staff and may provide the Neighborhood Council representative more time than allotted to members of the general public. They are also permitted up to five (5) minutes of time to address the legislative body. If the CIS or resolution pertains to a matter *not listed on the agenda*, the designated Neighborhood Council representative may speak during General Public Comments.

We share this information to assist you with the docketing neighborhood council items before your board/commission. If you have questions and/or concerns, please contact the Department of Neighborhood Empowerment at empowerla@lacity.org.

******** This is an automated response, please DO NOT reply to this email. ********

Contact Information
Neighborhood Council: Northwest San Pedro
Name: Melanie Labrecque
Email: melanie.labrecque@yahoo.com
The Board approved this CIS by a vote of: Yea(10) Nay(0) Abstain(0) Ineligible(0) Recusal(0)
Date of NC Board Action: 06/09/2025
Type of NC Board Action: For if Amended

Impact Information
Date: 06/19/2025
Update to a Previous Input: Yes
Directed To: City Council and Committees
Council File Number: 24-0602
City Planning Number:
Agenda Date:
Item Number:
Summary: The Northwest San Pedro Neighborhood Council (NWSPNC) is concerned about artificial turf. We also recognize the need for playing fields and other open green spaces. Currently, it appears that grass is the only viable alternative to artificial turf for such fields. However, grass requires water and fertilizer which have their own environmental problems, particularly in light of California’s persistent drought conditions. Therefore, the NWSPNC supports the proposed substitute motion in CF 24-0602 which requests a number of analyses of synthetic turf vs natural grass fields. The motion should, however be AMENDED, to include an investigation and analysis of any newer types of synthetic turf and an

ongoing mechanism for reviewing new types of turf if they become available. Also, if the City is considering mandating the removal/replacement/banning of artificial turf, a CEQA analysis should be required.

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combined 24-0602.pdf
208K

Proposed CIS in Support of CF 24-0602 If Amended

The Northwest San Pedro Neighborhood Council (NWSPNC) is concerned about artificial turf. We also recognize the need for playing fields and other open green spaces. Currently, it appears that grass is the only viable alternative to artificial turf for such fields. However, grass requires water and fertilizer which have their own environmental problems, particularly in light of California's persistent drought conditions.

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Date: 7 May 2025

To: Laurie Jacobs

From: Dean Pentcheff

Subject: Drawbacks of artificial turf for San Pedro's West Harbor development

The primary purpose of the proposed West Harbor development is to bring visitors to the waterfront by making it a high point of attraction for San Pedro[1], a goal we all share. If waterfront amenities are perceived as welcoming, enjoyable, and safe, then people will come. But artificial turf has so many problems that it will inhibit public presence. Therefore an inviting, safe, and natural grass lawn is a much better option.

The problems with artificial turf are multiple. Even if one or more of the reasons below are discounted, the multiplicity of reasons makes the choice of artificial turf undesirable for the San Pedro Waterfront and makes natural grass the desired solution.

Artificial turf infill is hazardous

Artificial turf is made of plastic "grass" blades stabilized and cushioned using "infill" — material laid down under and between the blades. The West Harbor DSEIR (page 2-29) states: "The approximately 50,000-square-foot lawn area, as proposed, would use FieldTurf™ or a similar product specially designed for festivals and event spaces. FieldTurf fibers are made of ultraviolet-stabilized polyethylene with polyurethane-coated backing layers that are 100-percent permeable. Unlike artificial turf on a sports field, ground rubber infill would not be used for the lawn. Instead, the infill materials would be sand, ground cork, granulated olive cores, or some other combination of similarly inert materials."

Ground rubber infill is so notorious for its chemical contamination that it has been banned across numerous U.S. and other jurisdictions, notably by LAUSD (Zuccaro et al. 2022). Avoiding crumb rubber infill is similar to asserting that leaded gasoline will not be used.

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[1] **West Harbor DSEIR ES.4.2 Project Purpose and Objectives**
The purpose of the Proposed Project includes:
1. Enhancement and revitalization of the existing SPW [San Pedro Waterfront] area by including a substantially larger outdoor concert amphitheater and entertainment lawn venue/park space and additional attractions… to attract visitors to the SPW area, thereby increasing the positive public visibility of San Pedro in general and the waterfront specifically…

The infill proposals offered by the makers of FieldTurf do indeed have offerings similar to the listed "… sand, ground cork, granulated olive cores, or some other combination of similarly inert materials." These infill options, however, are not as clean as they may seem.

Start with "sand". What is actually used in artificial turf infill is not sand, but "silica sand" (Turf Network 2023). That is a product manufactured by mining quartz and grinding it into sand and dust. The particles, therefore, do not resemble naturally occurring sand from riverbeds or ocean shores, which has undergone extensive "weathering" and smoothing of the particles from washing and sediment movement. Instead, silica sand is an angular, unweathered product of industrial scale mining. Inhalation of silica particles causes the incurable respiratory disease "silicosis" — one of the world's most prevalent respiratory diseases (Healthline 2013, Liu et al. 2023). Using a manufactured material that is known to cause incurable disease in industrial settings is a bad strategy for building public surfaces designed for grownups and children to play. This is so widely accepted that there are entire businesses selling recreational sand free of silica sand, for example: "Safe Sand Company: Delivering safety-tested play sand everywhere in the USA since 2001 — no crystalline silica, lead, or asbestos" (Safe Sand Company n.d.).

Next, FieldTurf's "PureSelect… made from olive cores (patent pending)" (FieldTurf n.d.). The patent appears to be Patent Application US 2021/0254290 (recorded as having been "abandoned" in 2022 due to failure to respond to the Patent Office). Though the product includes crushed olive cores, it is combined with silica sand as an infill, bringing the same problems as with a pure silica sand infill. The same problem (being combined with silica sand) also applies to FieldTurf's "PureFill" cork infill product.

Not one of these infill products is as desirable as the natural soil under natural turf grass.

PFAS are almost certainly present in artificial turf

PFAS (per- and polyfluoroalkyl substances) are a large class of industrially useful chemicals that we now know can be extremely harmful to people (Fenton et al. 2021, US EPA 2021, Blackburn 2024, Loria 2024, CDC 2024, Blake 2025). West Harbor developers have claimed either "… the amount of polyfluoroalkyl substances (PFAS) would be inconsequential…" (DSEIR p. 229) or "[t]he artificial turf proposed for the West Harbor amphitheater will not contain any PFAS (per- and polyfluoroalkyl substances) forever chemicals." ("West Harbor's Amphitheater Turf Lawn Fact Sheet", personal communication sent to Laurie Jacobs 2025-04-23).

Sadly, it is likely that there are, indeed, PFAS in the proposed artificial turf products. This can happen without malicious intent on the part of the site developers or even the artificial turf supplier. Here's the problem: there are over 5,000 chemicals in the PFAS class but only about 100 of them can be identified and quantified with targeted tests (Cancer Free Economy Network n.d.). The standard tests that are usually used (California Proposition 65 tests and US EPA Method 537) generally test for only a handful of specific chemicals, enabling them to miss many potential PFAS contaminants (Gearhart 2020). Independent testing by organizations unaffiliated with artificial turf producers generally find PFAS in artificial turf, sometimes in every sample tested (Ecology Center 2019).

Only total fluorine analysis or total oxidizable precursor assays are capable of finding PFAS chemicals besides the few that can be specifically identified (Toxics Use Reduction Institute 2020). As one might imagine, these analyses are not performed by artificial turf suppliers (or the industrial sources of their materials).

PFAS are a known harmful ingredient in plastics, and their alleged absence in the proposed artificial turf is highly questionable.

Plastic pollution comes from artificial turf

It is unequivocal that artificial turf releases plastic particles into the environment (Wang et al. 2019, de Haan et al. 2023). Besides the potential for loss of the infill material, the "grass" blades themselves are dispersed over time. We know this with certainty since artificial turf lawns must be replaced, usually on an 8–10 year cycle because they "wear out" — enough plastic has been lost to the environment that the whole surface must be replaced.

This plastic pollution has direct access to our coastal ocean, where we catch fish to eat.

Artificial turf is harmfully hot

Artificial turf gets hotter than natural grass — much hotter. A FieldTurf field at BYU was so hot that coaches were getting blisters through their shoes, prompting an investigation (Williams and Pulley 2002). Average surface temperature of natural turf, through a day, was 78° F. The artificial FieldTurf average was 117° F with highs reaching 200° F. Asphalt averaged 110° F. Yes, on a normal sunny day, artificial turf is hotter than asphalt pavement.

This, and similar findings, have led to safety regulations for athletes and students on artificial turf, including within LAUSD (Laughton 2017). Indeed, the last sentence of a recent study grimly suggests that "… [m]odels [predicting synthetic turf temperature] could be used to

schedule athletic events around periods of potentially hazardous surface temperatures." (Thoms et al. 2014)

We live in Southern California, and expect to enjoy the outdoors during our beautiful sunny days. Much of the use of this proposed space is for concerts and events in the evening, when the ground will have cooled. However, the proposal in the DSEIR is to remove all seating between events — clearly intending this to be a space for passive recreation during the day. Heat from artificial turf is undoubtedly high enough to be unpleasant much of the time, and can be hazardous some of the time.

How is this remediated? By irrigating artificial turf with water. Doing so can cool the surface for up to twenty minutes or half an hour (Williams and Pulley 2002), and hence must be repeated often. The amount of water it takes to keep artificial turf acceptably cool rivals the amount of water it takes to grow natural grass (Kanaan et al. 2020).

Artificial turf requires watering

There is an intuitive sense that artificial turf saves precious water, compared to natural grass. That turns out not to be the case.

Watering artificial turf is essential both to cool it to usable temperatures and to clean it. We might like to imagine that we would use recycled ("purple pipe") water instead of potable water, but that turns out to be impractical. The problem is that recycled water usually contains high levels of dissolved minerals — that stains artificial turf (TurFresh 2025). Removing those stains needs cleaning chemicals (which will directly enter the runoff system). Preventing them requires using filtered, softened, potable water.

To be acceptably cool and clean, artificial turf needs a similar amount of water as natural grass to grow. But only natural grass can use recycled water, since it can handle a higher dissolved mineral load.

Permitting may be a challenge

Attempting to get permits to install an artificial turf lawn at the oceanside may simply fail, leaving natural grass as the only (albeit more desirable) option.

At the State level, SB 676, passed in 2003, prevents municipalities from prohibiting drought-tolerant landscaping but specifically exempts "synthetic grass or artificial turf" — for good reason. Allowing municipalities the right to ban artificial turf was prompted squarely by all the problems above: toxicity, plastic pollution, heating, and illusory water savings.

At the City level, Council File 24-0602 (Blumenfeld and Yaroslavsky, May 24, 2024), directs City agencies to begin the process of transitioning away from installing artificial turf, to finding incentives and rebates for its removal, and to cease watering it.

The California Coastal Commission recently denied an application for an artificial turf baseball field by the University of California at Santa Barbara, requiring a natural grass plan instead (South Central Coast District Staff of the California Coastal Commission 2023).

City and Coastal permits for a large artificial turf installation may not be obtainable.

Natural grass is cheaper than artificial turf

Full lifecycle cost analysis shows that natural grass fields are cheaper than artificial turf. Daviscourt *et al.* (2017) compared five each of natural and artificial fields. They found that the average cost over an eight year life cycle was $821,000 for natural grass and $1,767,000 for artificial turf. Additionally, the authors note that the artificial turf maintenance costs they found may be unusually low, since their study location in Oregon "… prevented the need for antistatic, cleaning, and cooling applications to the fields…" (operations which would be necessary here). Artificial turf costs more to install at first, has comparable maintenance costs, and then needs to be removed, disposed, and replaced after 8–10 years.

Natural grass replaces itself continuously.

Our town

There is a final and, perhaps, overriding factor. West Harbor's intent is to be a premier destination for the South Bay — attracting locals and outsiders for active and passive recreation in our town. Natural grass is friendlier, healthier, and cheaper.

What's our best front lawn — a plastic mat? Or an open field of grass.

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