



February 28, 2008

Commissioner Thomas Frieden
Department of Health and Mental Hygiene
125 Worth Street
New York, NY 10013

Via Facsimile and U.S. Mail

Commissioner Adrian Benepe
Department of Parks and Recreation
The Arsenal, Central Park
830 Fifth Avenue, 3rd Floor
New York, NY 10021

Dear Commissioners Frieden and Benepe:

In light of the questionable safety and environmental impact of artificial turf, the Parks Department must issue an immediate moratorium on the installation of this turf and create a replacement schedule for existing turf fields. Additionally, the Department of Health and Mental Hygiene (DOHMH) must complete its literature review of potential adverse health effects of artificial turf in early spring, prior to the busy season in city parks, and conduct physical tests of the different artificial turf fields that have been installed in our City's parks.

The City has a responsibility to protect children and a vested interest in protecting the environment. Yet, even as evidence began to suggest that artificial turf may pose health risks and the DOHMH initiated its review, the Parks Department continued to make plans to install dozens more artificial turf fields. The Parks Department has shown little interest in studying artificial turf's effects on health and the environment, writing in a letter, "There is nothing inherently dangerous" about artificial turf. This brings into question the seriousness of the agencies' commitment to conducting a thorough health and safety review of artificial turf.

Other prominent groups have shown more concern. The Trust for Public Land, which partners with the Department of Education in creating school-based playgrounds, recently announced it will no longer use crumb-rubber-based artificial turf due to the possible health risks.

Health Risks and Environmental Impact

A fact sheet by the Mount Sinai Children's Environmental Health Center entitled "What to Know about Turf Fields," states that there are proven hazards associated with artificial turf, including heat and turf abrasions, which may harbor infections. The center recommends that a "child shower and wash thoroughly after playing on the fields" and that parents take precautions to remove all artificial turf from children's clothing and equipment before leaving the park. The Center's director has called for a moratorium on further installation of artificial turf.

The State of New Jersey recently shut down a 9-year-old artificial turf field after it found lead contamination in surface dust that originated from the artificial turf fibers. The New Jersey Department of Health and Senior

Services is now planning to test other artificial turf fields. Closer to home, the Trust for Public Land announced it will no longer use crumb-rubber-based artificial turf due to the possible health risks.

In addition, we find it troublesome that the Parks Department often highlights the “environmental benefits” of artificial turf but fails to adequately publicize the risks. We know that this technology reduces storm water infiltration and increases the urban heat island effect. Artificial turf fields have been shown to heat up to 160 degrees on hot days.

Analysis of Turf

The New York Community Trust had the foresight to convince the DOHMH to conduct a review and analysis of published studies on the potential risks of artificial turf. However, the DOHMH initiated the study six months ago and have yet to complete the analysis.

Given the recent discovery in New Jersey, existing literature may fail to address all possible environmental and public health concerns. Therefore, it is imperative that the DOHMH go beyond its literature review and immediately conduct physical tests of the different types of artificial turf fields that have been installed in city parks. DOHMH should also create a schedule to test the fields intermittently until the public is assured that the breakdown of the turf from repeated use does not lead to toxic exposure for users, especially young children.

Replacement Schedule for Turf

Because artificial turf disintegrates and the Parks Department does not, to our knowledge, have plans to replace the fields, the department should create and annually update a replacement schedule for all artificial turf fields. This information should be shared with the City Council and community boards. This practice will be essential if it is found that deteriorating turf poses a health risk and useful in properly assessing the long-term costs of using artificial turf.

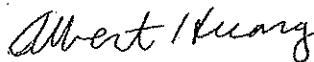
With serious questions being raised about the use of artificial turf the City should, and must, address these legitimate concerns. Given the potential consequences of exposing our children to any hazardous material, and the impact to our environment, the time to act is now. We look forward to your reply.



Betsy Gotbaum, Public Advocate



Christian DiPalermo, Executive Director of New Yorkers for Parks



Albert Huang, Environmental Justice Attorney, Natural Resources Defense Council



Dave Palmer, Staff Attorney, New York Lawyers for the Public Interest