#### 12/7/2021

#### Dear Planning Commission

The discussion on whether to increase the number of homes over the state required number of 1993 homes in the 2040 General Plan is perplexing and debatable. I would like my kids as well as workers, who support our infrastructure like teachers and town staff to be able to afford to live in Los Gatos. I also wish there was more diversity. But before we start deciding to increase housing numbers - let's talk about what affordable means and ask some developers how realistic it is to build housing that is "affordable" for people who support our infrastructure. Land is very expensive in Los Gatos, construction costs have gone up in price as well as many other living expenses. What's the goal by increasing our housing numbers past the 1993 state required number? Is the goal to provide Affordable housing? What's does "affordable" mean what is realistic? You can't find a home for under a million dollars and rents are over \$2,000 a month. What do developers say about developing affordable housing in LG? What does the most affordable housing look like? Where will you put the high density housing? What is the plan? Also, many residents moved to Los Gatos for its small town character, low density, quiet neighborhoods, and safe schools. How will you take the needs of those residents into consideration when making a decision? How will you alleviate the concerns of increased traffic, crowded schools, less safety, and more stress that comes with an increase in density? Do we have the resources and infrastructure in place to accommodate housing over the 1993 homes required by the state. I feel it is irresponsible to increase the number of homes over the 1993 required by the state before we have a clear plan and answer the above questions.

Warmly, Anne Roley This Page Intentionally Left Blank From: Pam Bond

Sent: Wednesday, December 8, 2021 4:12 PM

To: Planning Comment < PlanningComment@losgatosca.gov>

Subject: verbal communications - non agenda item

Dear Planning Commissioners,

I don't think my comment fits with the EIR review for the General Plan but it is in reference to page 6-34 of the General Plan related to artificial turf. I would like to implore you to consider moving artificial turf up in the discussion to the soonest possible time frame in the plan.

A group of concerned parents have been gathering evidence which we have been sending to LGUSD district staff and board cautioning against the use of artificial turf. LGUSD staff have recommended that artificial turf be installed in three elementary school courtyards (Van Meter, Daves and Blossom Hill) as well as a kindergarten yard (at Daves elementary) - decision to be made Dec. 14. The board will also decide whether Van Meter and Daves' fields will be converted to artificial turf, a decision to be made in the Spring. The courtyards will be installed this summer and the fields will be installed over the following two summers.

We first became concerned when we saw Valley Water's recommendation against the use of artificial turf ( see attached pdf). This led us to organizations who have been fighting the installation of turf all over the country. We also learned about Millbrae's recent moratorium on installations in their city until more can be learned. There are so many issues with this material and so many unknown and known human and environmental concerns that it does not seem prudent to allow unrestricted use of this material in our town, particularly with our proximity to an important waterway or two.

I am particularly worried about Creekside Sports Park which has crumb rubber. Two studies, by the EPA and by CalEPA's Office of Environmental Health Hazard Assessment are looking into toxicity and other concerns related to crumb rubber fields. It has already been shown that one chemical found in tire crumb is responsible for massive Coho Salmon decline in Puget Sound which doesn't bode well for the salmon in Los Gatos Creek. I read the MND for Creekside from 9 or 10 years ago and it looks like it was seriously lacking in runoff mitigation and concerns about tire and plastic blades getting into the environment and the creek.

I wanted to just send a message to get this on your radar if it isn't already. I would like to share more if there is an avenue to do so. We also have many expert letters and other information in a website that we cobbled together for the purposes of compiling what we've learned or what has been shared with us about artificial turf. www.questionfakegrass.org

I want to share with you this article linked below that has some big news in the artificial turf debate related to the presence of PFAS chemicals in the plastic blades and a great example of industry efforts at denial. Various experts including Dr. Graham Peaslee and The Ecology Center have tested artificial turf for the presence of PFAS chemicals using a testing method that has not been employed by the turf industry or its experts (like Dr. Green highlighted in the article for her false reporting and lies). The PFAS experts have found PFAS but the industry denied its presence, then admitted recently to a PFAS chemical called PVDF which they asserted to be inert. This article describes much more but reveals that Kristen Mello discovered a research paper wherein PVDF was shown to break apart in sunlight from its inert form into PFAS chemicals that are available to the environment and can wash off into our water supply.

https://www.eenews.net/articles/epa-linked-consultant-undercuts-agencys-pfas-concerns/

This alone should be a huge cause for concern. We have video testimony from Dr. Peaslee, Dr. Bennett and Kristen Mello on our website.

There is so much I could share but what I'd like to mention is that UCSF's Pediatric Children's Health Department echoes concerns of Mt. Sinai Children's Environmental Health in saying that they do not recommend the use of artificial turf and they cannot say that it is safe, particularly for schools and children. The long term health effects are unknown and testing of the materials is imperfect. A recent report shows that there there is huge cause for concern related to the use of plastic. "There are thousands more chemicals in plastic than we thought" (link ot research paper in this article) <a href="https://www.fastcompany.com/90649480/there-are-thousands-more-toxic-chemicals-in-plastic-than-we-thought">https://www.fastcompany.com/90649480/there-are-thousands-more-toxic-chemicals-in-plastic-than-we-thought</a>

Thank you for considering and if you have time, we have a lot of information compiled on our website.

Sincerely,

Pam Bond Los Gatos, CA Louise Van Meter Elementary Parent Girl Scout Leader Home and School Club garden program lead















# PFAS polymers pose serious health and environmental threats

Per- and polyfluoroalkyl substances (PFAS) are toxic chemicals used in thousands of products ranging from cookware and clothing to paint and firefighting foam. Known as "forever chemicals" because they remain in the environment for such a long time, PFAS have contaminated more than 2,300 sites across 49 states<sup>1</sup>, including drinking water of an estimated 200 million Americans.<sup>2</sup> The threat of these toxic and persistent chemicals is so great that many states, manufacturers and retailers are phasing out PFAS in products and processes. The state of Maine<sup>3</sup> and the European Union<sup>4</sup> are in the process of eliminating all uses of PFAS.

The backlash against PFAS has scared the chemical industry.

Manufacturers are now falsely claiming that many polymer versions of PFAS are safe, but this simply isn't true.

As we have learned with Teflon®, PFAS polymers have a toxic lifecycle.

PFAS polymers<sup>5</sup> are a type of plastic used in a vast array of products such as smartwatch bands, nonstick pans, and waterproof clothing. The chemical industry, which previously claimed that the mostly phased-out first generation of PFAS chemicals were totally safe, now claims the same thing about many PFAS polymers. But the fact is that these compounds have a toxic lifecycle that threatens human and environmental health.

Water supplies for millions of people have been contaminated by the highly toxic and persistent PFAS chemicals DuPont and 3M used to make the PFAS polymer known as Teflon<sup>®</sup>. Many people have fallen ill after being exposed to the toxic byproducts of Teflon<sup>®</sup> manufacturing, and exposures continue today.<sup>6,7</sup> With this history, the chemical industry's claims that PFAS polymers are safe must be recognized as highly suspect.

### Why all PFAS polymers must be phased out:

#### PFAS polymer production and use creates toxic PFAS pollution

PFAS polymers are made using other harmful PFAS chemicals, which are subsequently released into the environment when waste byproducts enter air and waterways. In fact, when scientists studied the fate of a commonly used group of toxic PFAS, they estimated 80% of those chemicals made since the 1950's have been released to the environment from PFAS polymer "manufacture and use." Certain PFAS polymers release toxic PFAS chemicals during their use, posing acute and chronic risk to human and ecological health. Workers in plants making or using PFAS polymers also may be exposed to serious hazards.

#### PFAS polymers can leave PFAS in our environment forever

Many PFAS polymers are extremely persistent in the environment, which poses unique concerns. Other types of PFAS polymers break down, only to form persistent PFAS chemicals. As a recent scientific paper noted: "if a chemical is highly persistent, its continuous release will lead to continuously increasing contamination" that will take "decades, centuries or even longer to reverse" and lead to "increasing probabilities of the occurrence of known and unknown effects." With few exceptions, highly persistent organic chemicals should never be used. 14

#### PFAS polymers can cause illness and injury

Respiratory illnesses associated with normal consumer uses of PFAS polymer-containing products such as waterproofing agents and sealants remains an ongoing problem that has "occurred for many years in many different countries." The Centers for Disease Control and Prevention have reported cases of "severe acute respiratory illness" linked to the use of a PFAS polymer-based shoe spray which was later recalled by the manufacturer. The Plastics Industry Association has noted in their own materials that PFAS polymer exposure can cause the flu-like condition known as "polymer fume fever." It has also been known for decades that fumes from Teflon® pans can kill birds. The chemical industry simply can't claim that PFAS polymers are safe when exposures during production and use have caused illness and injury.

### • PFAS polymer production emits "climate super-pollutants"

PFAS polymer production emits climate super-pollutants such as HCFC-22 and HFC-23, which are 5,280 and 10,800 times respectively more potent at warming the atmosphere than carbon dioxide, on a twenty year timescale. <sup>19</sup> The emissions of these two compounds from just a single PFAS polymer manufacturing plant are the equivalent of the annual carbon dioxide pollution from 750,000 passenger cars. <sup>20</sup> HCFC-22 also destroys the health-protective stratospheric ozone layer. <sup>21</sup>

#### Disposal of PFAS polymers poses serious threats

Landfilling of PFAS polymers can lead to contamination of nearby soil and groundwater and can contribute to releases of microplastics and, in some cases, other PFAS chemicals.<sup>22</sup> <sup>23</sup> Deep well injection of manufacturing waste relocates the threat and creates the possibility of

spills and leaching into drinking water.<sup>24</sup> Incineration of PFAS polymers creates toxic emissions that can harm frontline communities and spread far beyond their source. Most municipal incinerators are not designed to handle highly corrosive materials formed when PFAS polymers break down.<sup>25</sup> These same serious disposal issues are also present for the PFAS chemicals used to make the polymers.

#### Safer alternatives exist for many PFAS polymer uses

In many cases, safer alternatives to PFAS polymers are readily available and being used in products. For some applications, they were never necessary in the first place: no one needs their watch band or dental floss to be made from a PFAS polymer. For other uses where alternatives are not yet available, immediate efforts should be made to develop replacements, or products should be redesigned to eliminate the use of PFAS polymers. In the meantime, all currently avoidable uses should be phased out as quickly as possible.

The PFAS crisis began with polymers – let's not repeat history
 PFAS pollution first came to light from DuPont's manufacture of the PFAS polymer Teflon®
 which led to massive contamination still causing harm today.<sup>26,27</sup> We should learn from this
 disastrous history and take action to protect public health and the environment from these
 persistent toxic chemicals.

#### References:

<sup>1</sup> Environmental Working Group. (2021). Mapping the PFAS Contamination Crisis: New Data Show 2,337 Sites in 49 States. https://www.ewg.org/interactive-maps/pfas contamination

<sup>2</sup> Andrews, D., Naidenko, O. (2020). Population-Wide Exposure to Per- and Polyfluoroalkyl Substances from Drinking Water in the United States. Environmental Science & Technology Letters. 7, 12, 931-936. https://pubs.acs.org/doi/10.1021/acs.estlett.0c00713

<sup>3</sup> Associated Press. (2021, July 17). Maine requires so-called PFAS to be phased out by 2030. https://apnews.com/article/business-government-and-politics-environment-and-nature-maine-be458f81f85f3c01d509ccfa2573b6cd

<sup>4</sup> European Comission. (2021). The EU's chemicals strategy for sustainability towards a toxic-free environment. https://ec.europa.eu/environment/strategy/chemicals-strategy\_en

<sup>5</sup> Polymers are very large molecules with repeating individual units linked up to form chains or networks; some polymers are made up of hundreds or thousands of individual units. While there are a few different categories of PFAS polymers (including fluoropolymers and side-chain fluorinated polymers), all of them present serious health and environmental concerns.

<sup>6</sup> DiStefano, J. (2015, Aug 13). DuPont's toxic Teflon problem (Updated): Scientists knew the danger; managers kept it quiet. Philadelphia Inquirer. https://www.inquirer.com/philly/blogs/inq-phillydeals/321772182.html

<sup>7</sup> House Committee on Oversight and Reform. (Oct 21, 2020). Chairman Rouda Seeks Information on Continued Detection of Cancer Causing PFAS Chemicals at DuPont and Chemours Facilities. https://oversight.house.gov/news/press-releases/chairman-rouda-seeks-information-on-continued-detection-of-cancer-causing-pfas

<sup>8</sup> Lohmann R, Cousins IT, DeWitt JC, Glüge J, Goldenman G, Herzke D, Lindstrom AB, Miller MF, Ng CA, Patton S, Scheringer M, Trier X, Wang Z. (2020). Are Fluoropolymers Really of Low Concern for Human and Environmental Health and Separate from Other PFAS? Environ Sci Technol. Oct 20;54(20):12820-12828. doi: 10.1021/acs.est.0c03244

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<sup>12</sup> Ecology Center. (2020). What's Cooking? Non-stick Pan Study: Worker Rights, Health and Safety in Pan Production. https://www.ecocenter.org/healthy-stuff/pages/worker-rights-health-and-safety-pan-production <sup>13</sup> Cousins IT, Ng CA, Wang Z, Scheringer M. (2019). Why is high persistence alone a major cause of concern? Environ Sci Process Impacts. May 22;21(5):781-792. doi: 10.1039/c8em00515j. Erratum in: Environ Sci Process Impacts. 2019 May 1; PMID: 30973570.

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<sup>18</sup> Stove Fumes Killing Caged Birds. (1986, March 9). Chicago Tribune.

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## **Artificial Turf**

Santa Clara Valley Water District

Through the Landscape Rebate Program, the Santa Clara Valley Water District is helping to promote water conservation while at the same time encouraging the installation of healthy, sustainable landscapes that will enhance our local environment. The district is not only responsible for safe, clean drinking water, we are also stewards of our entire watershed and have designed our program to go beyond simply saving water.

While artificial turf requires less water than a natural turf lawn, there are healthier and more ecologically sound alternatives that we would like to promote with our Landscape Rebate Program. For the following reasons, artificial turf is not included in our Landscape Rebate Program.

# Artificial turf is not a living landscape and does not:

- Increase biodiversity of plant, animal and insect populations;
- Provide habitat for local fauna;
- Foster healthy soils (healthy soils increase moisture holding capacity, support healthy microbes and insects, filter pollutants and improve water quality);
- Cool surrounding air temperatures (artificial turf can get significantly hotter than surrounding air temperatures, contributing to the heat island effect by increasing air temperatures in urban settings);
- Sequester carbon or produce oxygen like living plant material can.

### Artificial turf is not water free

- For sanitation purposes, water is needed to periodically clean the turf. Chemicals may also be needed occasionally.
- Because artificial turf can get very hot in direct sunlight, water is sometimes needed to cool the turf before it can be used comfortably.



An example of a front yard lawn conversion that reduces water use while also creating a sustainable landscape.

# Artificial turf has potential environmental concerns

- Runoff from artificial turf may contain
  pollutants like heavy metals and chemicals
  that can reach surface water or groundwater.
  Results may vary for different artificial turf
  products, but more scientific research is needed
  (See report from Environmental and Human
  Health, Inc: http://www.ehhi.org/reports/turf/
  and the district's report on artificial turf fields at:
  http://valleywater.org/Programs/
  conservationannualreports.aspx).
- Artificial turf is a synthetic material with a relatively short lifespan ranging from 10-20 years that may eventually end up in landfills.

Fortunately, the Landscape Rebate Program allows many beautiful, low water using options that result in more sustainable and beneficial landscapes. For additional information about the Landscape Rebate Program or our extensive Qualifying Plant List, please call the Water Conservation Hotline at 408-630-2554 or visit www.valleywater.org.





