

27 Moseley Avenue  
Westfield, MA 01085

September 8, 2020

Douglas Sederholm, Chair  
Martha's Vineyard Commission  
P.O. Box 1447  
Oak Bluffs, MA 02557

Ewell Hopkins, Chair  
Town of Oak Bluffs, MA Planning Board  
P.O. Box 132  
7 Oak Bluffs, MA 02557

Dear Chair Sederholm, Chair Hopkins, and Commission and Planning Board Members,

Salutations from Westfield, Massachusetts. I write to you because I have learned you are weighing options for playing fields, and I would like to share our experience with you for your consideration.

In 2016, Westfield residents learned that— like the Vineyard — our water supply had been contaminated by Per- and Polyfluoroalkyl Substances (PFAS) from aqueous film forming foam used in fire fighting training. That same year, a developer applied for (and received) permits to install artificial turf playing fields in another area of the City, adjacent to wetlands, and in an aquifer recharge zone.

In October 2019, we learned from an Intercept article by Sharon Lerner that the manufacturing process of extruding the artificial turf materials requires lubrication of the machinery with PFAS, and that these chemicals were leaching into nearby waterways.

<https://theintercept.com/2019/10/08/pfas-chemicals-artificial-turf-soccer/>

We then learned from The Atlantic and from your own Martha's Vineyard Times that the fields were not being recycled as claimed.

<https://www.theatlantic.com/science/archive/2019/12/artificial-turf-fields-are-piling-no-recycling-fix/603874/>

<https://www.mvtimes.com/2020/02/04/questions-raised-mvrhs-field-project/>

You can imagine what these revelations have done for us here in Westfield. I am writing to suggest that you consider all the potential consequences of the choice before you. Artificial turf may carry with it more far than you see.

None of us wants to be responsible for contributing to additional PFAS contamination because we trusted the lab report of someone who was trying to sell us something.

Given that there are between 5,000-10,000 distinct PFAS in commercial use, it is exceptionally important to note that the Cooperstown Environmental proposal for testing is missing a number of critical tests that could actually assess whether or not the artificial turf you are considering contains PFAS. **Specifically, it is missing the EPA 533, the Total Oxidizable Precursor Assay (TOP assay), and the Total Organic Fluorine (TOF) analyses. This proposal also does not list any non-targeted PFAS analyses for any samples or any PFAS testing (EPA 537.1 or 533) for the groundwater sample.**

While TOP, TOF, and non-targeted analyses are not EPA certified, they are vital to our assessment of the thousands of PFAS not included in the EPA methods - AND - they are available: TOP commercially, and the others from researchers at UMASS Amherst. On an island with a sole source aquifer and a proposed site in a Zone II, all of the above are essential.

If this project moves forward, I strongly suggest that the Martha's Vineyard Commission and Oak Bluffs Planning Board mandate the testing of the groundwater for PFAS -- using EPA 537, 533, TOP, TOF, and non-targeted analysis -- both before groundbreaking and after installation and the first heavy rain.

Beyond water quality, please also consider whether or not you want your athletes and coaches, their families and younger siblings, playing, lounging, crawling around, falling, sliding, and getting injuries on synthetic polymers coated in significant concentrations of endocrine disrupting "forever chemicals". Whether dermal absorption, wound contact, or hand-to-mouth ingestion, this is an exposure to persistent, bioaccumulating, toxic chemicals (and a tremendous liability) that is entirely avoidable.

Eventually MassDEP and the regulations will catch up with this waste dumping artificial turf industry. Consider carefully whether or not your community wants to pay for installation AND removal and disposal of what could be declared "hazardous materials" in just a few years. Alternatively you could choose to create your fields on real grass turf and treat it with care, as if the water you drink is under it....because it is.

Thank you for considering these comments during your deliberation. Please don't hesitate to contact me should you wish to discuss any of these comments further.

Sincerely,



Kristen Mello  
Director / Co-founder  
Westfield Residents Advocating For Themselves (WRAFT)  
klm.wraft@gmail.com