



**TOWN OF WEST TISBURY
CONSERVATION COMMISSION**

**P.O. BOX 278
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December 9, 2020

Via Electronic Mail

Martha's Vineyard Commissioners
Martha's Vineyard Commission
P.O. Box 1447
Oak Bluffs, MA 02557

Re: Martha's Vineyard Regional High School
Artificial Turf Athletic Fields
Oak Bluffs DRI-352-M4/2020

Dear Commissioners,

The West Tisbury Conservation Commission thanks the Martha's Vineyard Commission for the opportunity to comment on the proposed artificial field at the MV Regional High School as a Development of Regional Impact.

As a body charged with administering the Massachusetts Wetlands Protection Act and the safeguarding of related natural resources, the Commission has grave concerns about the long-term risks of this installation, its maintenance and its ultimate disposal.

Paramount among these concerns is protection of the island's single source aquifer and its fragile ponds. The proposed site lies in the already stressed Sengekontacket and Lagoon Pond watersheds and in a Zone 2 wellhead protection area. Yet the science regarding toxic runoff and leaching from the two-and-a-half acre plastic field and rubber track (similar examples of which have been shown to contain cadmium, benzene and other carcinogens) is unsettled; the impact of repeated applications of as yet unspecified disinfectant and cleaning chemicals unknown.

The MVC hired the environmental firm, Horsley Whitten, to conduct a third-party review of this project. This resulted in a recommendation for comprehensive PFAS testing, to which the applicant has objected. Since PFAS are used in the manufacture of the plastic fibers, we urge that this comprehensive testing be undertaken before any further consideration of the project. Once installed, a plastic field is unlikely to be ever returned to natural grass, so it behooves us to undertake the most comprehensive risk evaluation possible at this time.

In addition to potential risks to wetland and drinking water, the Commission is concerned about the potential fire hazard posed by such a sizeable area of flammable, toxic petrochemical material abutting the State Forest. It is concerned about increased light pollution and the effects on wildlife, including rare and endangered species, since the new field is proposed to be heavily used by the wider community, including during night-time hours. It is concerned about increased vehicle traffic due to the proposed consolidation of island-wide sporting events and practices at the site.

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Finally, at a time when island towns are passing bylaws to reduce plastic use, we are deeply concerned about replacing healthy, cooling, natural grass fields with acres of plastic that will have to be periodically replaced and disposed of, with all the attendant environmental costs and hazards.

Very truly yours,

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Whit Griswold, Chair