

From: [Robina Suwol California Safe Schools](#)
To: [Lensing, Allison@OEHHA](mailto:Lensing.Allison@OEHHA); [Turf, Synthetic@OEHHA](mailto:Turf.Synthetic@OEHHA)
Subject: Fwd: OEHHA public comment - California Safe Schools
Date: Monday, April 28, 2025 9:59:33 AM

EXTERNAL:

----- Forwarded message -----

From: **Robina Suwol California Safe Schools**
Date: Mon, Apr 28, 2025 at 9:57 AM
Subject: OEHHA public comment - California Safe Schools
To: <Allison.Lensing@oehha.ca.gov>, <SyntheticTurf@oehha.ca.gov>

April 27, 2025

Pesticide and Environmental Toxicology Branch
Office of Environmental Health Hazard Assessment
California Environmental Protection Agency
P.O. Box 4010, MS-12B
Sacramento, California 95812-4010
Attention: Synthetic Turf Study
Sent via email: SyntheMcTurf@oehha.ca.gov

Dear OEHHA Synthetic Turf Study Division,

My name is Robina Suwol and I am the Executive Director of California Safe Schools, a children's environmental health and safety organization founded in 1998.

Our organization has attended and commented at all the OEHHA Synthetic Turf Panel meetings since the creation of the OEHHA Scientific Panel. We are grateful for the opportunity to comment on the OEHHA Synthetic Turf Study Report and appreciate the significant time and effort contributed by the OEHHA Scientific Panelists and staff in preparing this report.

As requested, please find our comments below:

Limited Focus

The report indicates that a total of 35 fields were studied with the focus on risks from Tire Crumb Rubber.

Given the wide variation in materials, age, maintenance, and usage of artificial fields across California,

the limited focus solely on tire crumb rubber, is insufficient to represent the broader landscape and variability of all chemicals in artificial turf installations statewide and their health impacts.

Lack of Real-Time Biomonitoring and Beyond Tire Crumb

A comprehensive health and safety assessment requires real-time biomonitoring of individuals actively using

the synthetic turf fields — including athletes, referees, coaches, and spectators — under normal playing conditions.

The current conclusions of health impacts in the report appear to have been determined by the responses from 1069 participants

who completed OEHHA's online or in-person surveys, and by designated staff observing and noting 40 videotaped

soccer players during five practices and five games involving exposure to tire crumb rubber.

Future research should evaluate all potential pathways,

including not only tire crumb but also synthetic turf fibers, backing materials, and other infill materials, all of which may contribute to health risks.

Moreover, the report lacks critical information such as:

- The specific location of each of the fields
- Screening for potential conflicts of interest among survey respondents and video participants.

Criteria used to determine the selection of the 40 soccer players

- Age, physical address and maintenance status of the fields sampled
- Dates, times, and temperatures at the time of sampling. It would be unconscionable to fail to note that field temperatures are particularly relevant, as artificial turf can reach dangerously high surface temperatures of up to 160°F, posing additional health risks. Luz, D., "Synthetic Turf: Health Debate Takes Root", 2008.

Other issues:

Without real-time full chemical exposure biomonitoring data, the health risk analysis remains speculative.

Cumulative chemical exposures are not adequately addressed

Artificial turf systems are known to release multiple hazardous chemicals, including:

- Carcinogens (e.g., PAHs, heavy metals),
- Neurotoxins,
- PFAS

The OEHHA study does not evaluate the potential cumulative health effects of multiple, simultaneous

chemical exposures on individuals of different ages and health statuses. This is particularly concerning given the

known vulnerability of children and adolescents to chemical exposures. Without cumulative impact analysis, the

data provided cannot constitute a complete Health Risk Assessment.

Vulnerability of Sensitive Populations

Children are particularly vulnerable to chemical exposures due to:

- Higher inhalation rates relative to body weight,
- Increased hand-to-mouth activity,

- Thinner skin barrier, allowing easier chemical absorption,
 - Open wounds and abrasions increasing direct chemical entry
- Adolescents are also vulnerable, as their reproductive and neurological systems continue developing well into their twenties. Similarly, health-compromised adults may experience greater susceptibility to these chemical exposures. Protecting these sensitive populations is imperative.

Community Testimonies: Persistent and Prolonged Secondary Exposure

Through California Safe Schools' testimony at OEHHA meetings — with parent permission — students

and families have reported that synthetic turf materials adhere to skin, clothing, shoes, socks, and personal belongings.

These materials which include but are not limited to, tire crumb rubber, have been found embedded in skin wounds requiring medical intervention.

In addition, contaminated particles are transported into vehicles, homes, and showers, leading to exposures

far beyond the initial time spent playing on the fields. These real-world experiences reflect secondary exposure pathways that

OEHHA's report does mention but does not fully capture.

Given the limitations identified, California Safe Schools respectfully and strongly urges OEHHA to call for a precautionary moratorium on the installation of new synthetic turf fields until comprehensive, peer-reviewed health

and environmental risk assessments, including biomonitoring of active users are completed. The health and safety of our

children, communities, and environment demand the highest protections. Thank you for reviewing our comments.

Sincerely,

Robina Suwol
Executive Director
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