



March 25, 2024

Re: SF3869/HF3705 OPPOSE

Dear Chair Hawj and members of the committee,

Clean Water Action was founded in 1972 with the mission to protect the land on which we live, the air we breathe, and the water we drink. We represent over 132,000 Minnesota members, and we are writing to share our concerns regarding SF3869/HF3705, which addresses synthetic turf.

We must protect our waters and aquatic habitats from contamination from false solutions and supporting the addition of synthetic turf to the best management practices to control stormwater runoff is just that - a false solution.

While we appreciate the intent of this bill and the fact that PFAS is specifically prohibited as a component of artificial turf, we still have many concerns regarding encouraging the use of synthetic turf both in general and as a method to manage stormwater runoff.

- **Prevalence of microplastics** - Depending on the size of the turf field, 200-3200 pounds of microplastics are released into the environment each year (Dublin). Microplastics have been found throughout the human body, including in breast milk, cord blood, sperm, the brain, the colon, and blood. In fact, over 90% of humans have microplastics in their systems. One study estimated the average adult takes in up to 121,000 microplastic particles per year through air, food, and beverages (*Microplastics Facts & Figures*, n.d.). The fact that humans are consuming so many microplastics is concerning because of the long-term impact associated with exposure to microplastics. These impacts include reduced food consumption, impaired growth, behavior problems, reduced fertility, and damage to cells and DNA, among other concerns (*Microplastics Facts & Figures*, n.d.).

We are also increasingly seeing fish consumption advisories because of high levels of microplastics found in aquatic animals. This is a problem impacting every aspect of human life.

- **Turf contains many toxic chemicals with negative human health impacts:**
 - Benzene: known human carcinogen
 - Arsenic: known human carcinogen
 - Styrene: anticipated to be a human carcinogen
 - Polycyclic aromatic hydrocarbons (PAHs): anticipated to be a human carcinogen
 - Zinc: neurotoxicant
 - Cadmium: known human carcinogen
 - Chromium: known human carcinogen; respiratory irritant
 - VOCs and SVOCs (e.g. benzothiazole, hexane, toluene, formaldehyde): respiratory irritants or asthma triggers
 - Neurotoxicants: some are known human carcinogens
 - Phthalates: reproductive toxicant

- Crystalline Silica: known human carcinogen; respiratory irritant
- Latex: allergen
- Particulate matter: respiratory irritant or asthma trigger
- Turf replaces natural grass and harms pollinators (Dubin, 2023)

Turf is not a solution to manage stormwater. It ends up in a landfill at the end of its lifecycle. With 98 out of Minnesota's 101 landfills leaching into the groundwater, this directly impacts our water quality. It's vital that to protect the ecosystem we encourage native vegetation rather than synthetic and false solutions.

We appreciate your time and consideration and strongly urge a no vote on SF3869/HF3705.

Sincerely,

Avonna Starck
Minnesota State Director
Clean Water Action

Dubin, C. (2023, April 28). *Synthetic Turf is HAZARDOUS — Beyond Plastics - Working To End Single-Use Plastic Pollution*. Beyond Plastics. Retrieved March 25, 2024, from <https://www.beyondplastics.org/fact-sheets/synthetic-turf>

Microplastics Facts & Figures. (n.d.). Ocean Conservancy. Retrieved March 25, 2024, from <https://oceanconservancy.org/wp-content/uploads/2023/02/Microplastics-Fact-Sheet-FINAL-2.3.23.pdf>