TOWN OF LOS GATOS

PARKS AND SUSTAINABILITY COMMISSION REPORT

MEETING DATE: 06/01/2026

ITEM NO: 2.

DESK ITEM

DATE: June 01, 2026

TO: Parks and Sustainability Commission

FROM: Nicolle Burnham, Parks and Public Works Director

SUBJECT: Creekside Park Turf Repair (Written Report)

REMARKS:

Attachment 1 contains public comments received before 11:00 a.m. on the day of the Commission meeting.

Attachment Provided with this Desk Item:

1. Public Comments received before 11:00 a.m. on the day of the Commission meeting.

PREPARED BY: Nicolle Burnham
Parks and Public Works Director

From: Andrea Wald
To: PPW Comment
Cc: Rob Moore; Maria Ristow; Mary Badame; Rob Rennie; Matthew Hudes
Subject: 6/1 Parks Commission, Public Comment Item #2
Date: Saturday, May 30, 2026 8:30:49 PM
Attachments: Los Gatos Parks and Rec mtg 6-1 agenda item #2 - supplemental info.docx

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[EXTERNAL SENDER]

Dear Commissioners and City Council members,

The attached document is supplemental material to the previous email I sent. The previous email was a basic summary of my concerns with the study issue. The attached document provides details for my concerns: references, page numbers, screen shots of areas of concern and materials to support those concerns.

I respectfully request that the Commission not accept the study at this time and conduct further review into this issue before conclusions are adopted or recommendations are made.

Once again, thank you for continued service to the Los Gatos community.

Sincerely,

Andrea Wald
Co-Founder, Community for Natural Play Surfaces

1. Problems with Citations and Source Materials

There were several links that I actually tried to view but they did not work and/or referenced something that was not actually what was referred to in the text.

Two Examples from page 6:

"DETAILED ANALYSIS Materials Artificial turf has multiple layers consisting of a base layer made of gravel or stone, artificial grass carpet with backing material and artificial grass fibers, and infill materials that provide cushioning[1"]

The related reference for this statement above is in the link below. The Turi report does not provide support for this statement – why have they referenced it?

1. https://www.turi.org/publications/athletic-playing-fields-2/

And this link, also at the bottom of page 6 does not even work.

2. turi.org/publications/per-and-polyfluoroalkyl-substances-pfas-in-artificial-turf-carpet

2. Organic Natural Grass Maintenance Was Not Adequately Considered

There's a lot of info in the report about environmental impact of natural grass – no explanation why it is perceived as higher than AT. There was even something about not using pesticides and fertilizers on natural grass to lessen the impact – see below.

Natural grass could provide a safer alternative by eliminating chemicals found in the surfacing material or applied to the surface of artificial turf. However, natural grass is often maintained using synthetic pesticides and fertilizers, which may present their own health concerns. See Table 1: Comparing Chemicals and Other Health Hazards or Artificial Turf with Natural Grass.

It is possible to maintain natural grass organically, thereby eliminating any environmental concerns about synthetic pesticides and fertilizers – with fabulous results and actually costing less than chemically treated grass. See links below:

https://beyondpesticides.org/dailynewsblog/2010/03/organic-turf-programs-cost-less-than-chemical-programs-report-shows/

Beyond Pesticides Organic Cost Comparison.pdf

3. Heat Impacts and Climate Assumptions

Screen shot from Page 8 :

Heat Generation
Surface temperatures on artificial/synthetic turf fields is greater than natural grass fields[11]. There has been research testing surface temperatures of alternative infill options compared to the typical black rubber associated with tire crumb infill; however, those alternatives only had the potential to lower surface temperatures by five or ten degrees but would offer little benefits when surface temperatures exceed 150° F[12]. Natural grass fields, in comparison with artificial turf fields, can reduce the heat island effect in urban areas. Heat generation is greater in artificial turf than natural turf, but in mild climates, such as that in the Town of Los Gatos, intense heat may be less frequent and unpredictable.

Our ever increasing and prolonged heat waves have been a topic of many reports and articles. Saying that intense heat in Los Gatos is not of concern is unacceptable. Just recently there were two very well written articles about heat patterns around the world – Los Gatos is no exception.

https://insideclimatenews.org/news/13012026/multiple-reports-show-2025-extreme-global-heat/

https://insideclimatenews.org/news/30052026/fifa-world-cup-extreme-heat/

And then there is the below info from an AI search about increasing heat waves affecting Los Gatos:

Yes, Los Gatos has experienced a significant increase in the frequency and intensity of heat waves over the years. This trend mirrors the broader California heat wave trends driven by global warming, which have doubled the average number of U.S. heat waves since the 1980s. KQED +2

The changing climate dynamics near Sunnyvale and Los Gatos highlight this shift:

- **More Hot Days:** A typical hot day in Los Gatos is considered anything above a "feels like" temperature of 93°F. In recent years, the area has averaged about 7 of these days annually, but models project that number will nearly double to 13 days a year within the next few decades. firststreet.org
- **Deteriorating Climate Score:** Climate analysis indicates a "Very High" climate change severity score for the Los Gatos Climate Change Severity area, having worsened by over 34% in recent long-term assessments. AQI.in
- **Extended Heat Season:** The overall heat wave season length has expanded by dozens of days across the U.S. compared to the 1960s. Locally, inland valleys of the Bay Area have been increasingly battered by prolonged multi-day spikes and unprecedented early-season heat waves, making it much harder for neighborhoods to cool down at night. Center for Climate and Energy Solutions +2

4. Consistency with the Los Gatos General Plan

From page 9 of the report:

General Plan Policy Consistency
Replacement of the artificial turf would align with the Town of Los Gatos *Synthetic Turf Implementation Program* that would determine the appropriate use of artificial turf and consideration of alternative ground covers. The project would implement policies **PFS-1.1** and **PFS-1.2** as listed in the General Plan Chapter 6, Public Facilities, Services, and Infrastructure Element. The turf replacement would also align with the Review ***Open Space Standards Implementation Program*** by implementing policy **OSPR-4.4**. The turf replacement would also align with the ***Adopt Best Management Practices Implementation Program*** by implementing policy **OSPR-7.1**. See **Table 2: General Plan Policy Consistency Analysis** for project consistency with the General Plan. Overall, both options would be consistent with the Town of Los Gatos General Plan but the artificial turf option would align more closely with water conservation efforts.

https://www.losgatosca.gov/DocumentCenter/View/31984/8-LGGP_2040_Environment-and-Sustainability-Element

Screen shot from page 25 of the above document:

ENV-17.8 **Low-Impact Development**

SUS

Encourage Low-Impact Development (LID) measures to limit the amount of impervious surface in new development and redevelopment to maintain or increase the retention, treatment, and infiltration of urban stormwater runoff from pre-development conditions. LID measures should also apply to major remodeling projects and to public and recreation projects where possible.

Water typically runs off artificial turf – especially during heavy downpours, and is not absorbed into the aquifer as happens with natural grass surfaces.

The General Plan document does not appear to support the statement that replacement of the artificial turf would align with the Town of Los Gatos Synthetic Turf Implementation Program. The document simply says: "determine the appropriate use of artificial turf". This study was one way to answer that question but since it has too many inconsistencies, I believe no conclusion can be drawn.

https://online.encodeplus.com/regs/losgatos-ca/doc-viewer.aspx?secid=154&keywords=artificial#secid-154

6.14 Implementation Programs

	Programs	Implements Which Policy(ies)	Responsible Supporting Department(s)	2020 – 2025	2026 – 2040	Annual	Ongoing
A	**Water Efficient Landscape Ordinance** Review and update the Town's Water Efficient Landscape Ordinance with improved large landscape conservation programs and agency incentives for non-residential customers. SUS	PFS-1.1 PFS-1.2 PFS-1.3 PFS-1.4	Community Development	■			
B	**Water Audit Programs** In collaboration with efforts by local water purveyors, promote water audit programs that offer free water audits to single-family, multi-family, large landscape accounts, and commercial customers. Collaborate with purveyors to enact conservation programs for commercial, industrial, and institutional (CII) accounts and create programs to install ultra-low-flush toilets in facilities.	PFS-1.1 PFS-1.4 PFS-1.5 PFS-1.6	Parks and Public Works / Community Development	■			
C	**Artificial Turf** Determine the appropriate use of artificial turf and consideration of alternative ground covers. SUS	PFS-1.1 PFS-1.2	Parks and Public Works / Community Development	■			

5. Aesthetics, Biodiversity, and Mental Health

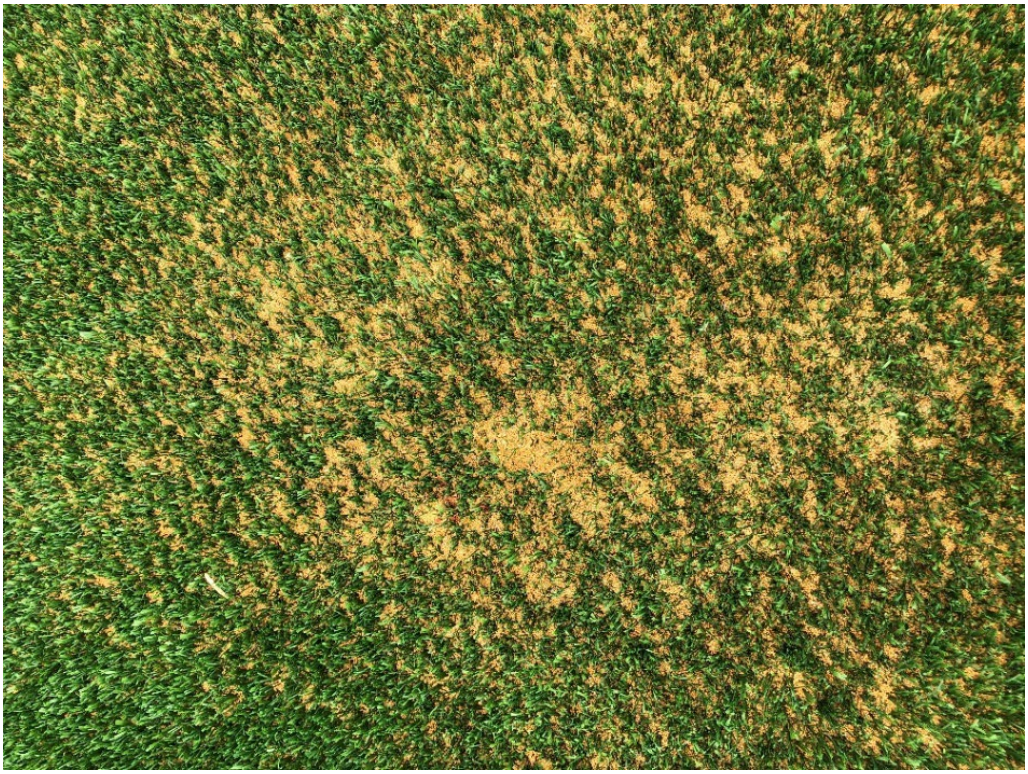
From page 11:

"The color differences between artificial turf and natural grass would vary depending on maintenance upkeep, particularly with natural grass. Natural grass requires consistent watering and can appear patchy due to heavy uses and weathering. An article published by the University of Minnesota Turfgrass Science Program on Turfgrass aesthetics noted that consistently green surfaces help reduce stress, increase energy, and improve overall mood for the viewer. Artificial turf grass would be more durable and maintain its color, resulting in little to no patchy areas. Artificial turf would have consistent green colors proven to be more aesthetically pleasing to viewers than natural grass with greater variability in color shades depending on watering, use (e.g. if one spot had greater activity than others, resulting in increased wear and tear), and weather conditions (e.g. if one area received more sun than others)."

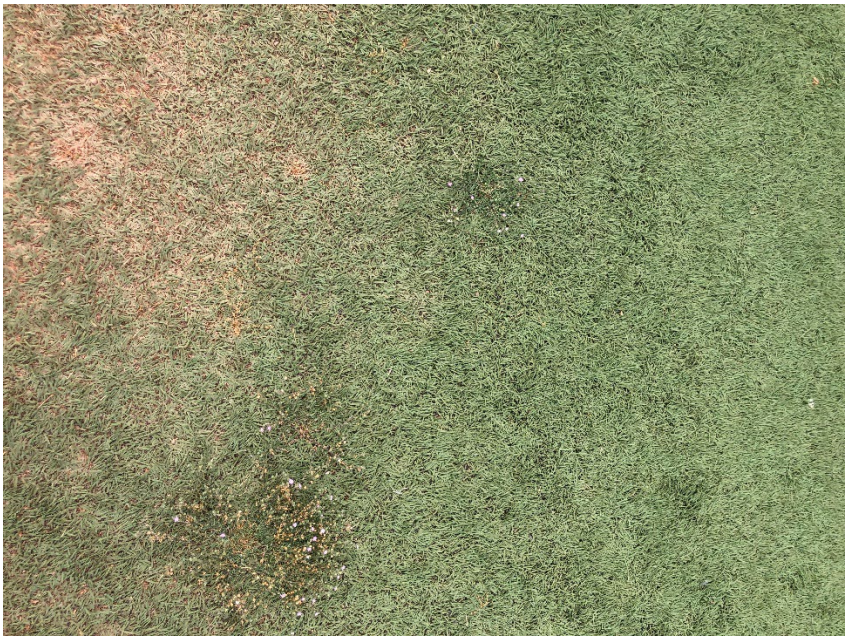
Well maintained natural grass does not have to be patchy. Artificial turf is not always consistent in its appearance. See a few photos from 10-2023 below:

Storm drain near one of the athletic fields at Fremont High School (artificial turf blades that have migrated off the field):

Another photo from Fremont High School's artificial turf field – cork migrates and bunches up – therefore the clean, consistent appearance of artificial turf that was referenced is not always accurate:



AT fields can even have weeds, like natural grass:



Lastly, this field at Cupertino High School shows patched areas of artificial turf:

As for the following statement found on page 11: *"An article published by the University of Minnesota Turfgrass Science Program on Turfgrass aesthetics noted that consistently green surfaces help reduce stress, increase energy, and improve overall mood for the viewer"-*

There are actual studies that show nature and natural materials/surfaces have benefits for mental health and well-being. The only thing "green" about artificial turf is its color! I've provided links and portions of those studies below.

2024 April 16, Kings College London, **Biodiversity is key to the mental health benefits of nature, new study finds**
https://www.kcl.ac.uk/news/biodiversity-is-key-to-the-mental-health-benefits-of-nature-new-study-finds
"Researchers found that environments with a larger number of natural features, such as trees, birds, plants and waterways, were associated with greater mental wellbeing than environments with fewer features, and that these benefits can last for up to eight hours … 'To our knowledge, this is the first study examining the mental health impact of everyday encounters with different levels of natural diversity in real-life contexts. Our results highlight that by protecting and promoting natural diversity we can maximize the benefits of nature for mental wellbeing' … The study took place between April 2018 and September 2023, with 1,998 participants completing over 41,000 assessments. Each participant was asked to complete three assessments per day over a period of 14 days."

2024 April 16, Nature, **Smartphone-based ecological momentary assessment reveals an incremental association between natural diversity and mental wellbeing**
https://www.nature.com/articles/s41598-024-55940-7
"Environments which included a larger range of natural features, such as trees, plants and birdlife (high natural diversity) were associated with greater mental wellbeing than environments including a smaller range of natural features (low natural diversity). There was evidence of a mediating effect of natural diversity on the association between natural environments and mental wellbeing. These results highlight the importance of policies and practices that support richness of biodiversity for public mental health …

The aim of the present study was to investigate the impact of natural diversity on self-reported mental wellbeing, a strong predictor of mental health in the general population. Here we define natural diversity based on the perceived number of different natural features (e.g. trees, plants, birds, water) within the surrounding environment. This approach allows us to examine whether a combination of different natural elements, rather than just the presence of green space or actual species richness, has an increased effect on mental wellbeing. This may be particularly relevant given the current limited understanding of the impacts of natural diversity on mental wellbeing …

Demographic characteristics such as age, gender, ethnicity, education, and occupational status were included as potential confounding variables. These were self-reported during the initial momentary assessments …

While being in natural environments had a significant positive impact on mental wellbeing independent of natural diversity, amount of natural diversity did account for 23.4% of the overall relationship. Specifically, for every additional natural feature, there was a 0.91 (95% CI: 0.83, 0.99) average increase in mental wellbeing when individuals were in natural environments. This indirect effect through natural diversity suggests that not just the presence of natural environments, but also their diversity, plays a crucial role in the impact on mental wellbeing.

These findings hold significant implications for both environmental conservation and urban planning policies …

[It's] important to recognize that in densely populated areas like cities, promoting biodiversity can sometimes lead to human-environmental conflicts, ranging from minor conveniences, such as the presence of flies or spiders, to more significant concerns such as increased risk of Lyme disease[41], lack of an accessible path or reduced feelings of safety[39]. However, it should also be recognized that low biodiversity poses its own challenges to human health, including increased vulnerability to trans-species transmission of disease and infectious agents[57]. Land management, maintenance and education efforts around residential areas with high levels of natural biodiversity can help create balanced coexistence between humans and the natural environment. Striking this balance is crucial as we work towards developing urban environments that support human health through increased biodiversity, while ensuring the safety and comfort of those living in the cities …

In the current study we defined natural diversity as the number of distinct perceived natural features in one's environment (e.g., trees, plants, birds, water). This simple measure of natural diversity is likely to be associated with more nuanced measures of biodiversity, such as intra-species richness …

We found significant evidence supporting the time-lasting positive impact of individual natural features on mental wellbeing. We also report a significant time-lasting incremental effect of natural diversity on mental wellbeing."
2022 Frontiers in Public Health, **Getting Out of the Classroom and Into Nature: A Systematic Review of Nature-Specific Outdoor Learning on School Children's Learning and Development**
https://pubmed.ncbi.nlm.nih.gov/35651851/
"**Connecting children with natural spaces has been shown to benefit their physical and mental health; however, the utility of nature-specific outdoor environments as a setting for curricular and non-curricular learning has yet to be clearly established. Our aim was to undertake a narrative synthesis of international evidence of nature-specific outdoor learning and its benefits for personal and social development, wellbeing and academic progress** …
This systematic review searched publications between 2000 and 2020 in nine academic databases for evidence of socio-emotional and academic benefits of nature-specific outdoor learning in school-aged educational settings, using concise search criteria registered with PROSPERO. The total search results of 17,886 records were initially screened by title, and then two reviewers made blind reviews of the title and abstract of 1,019 records …
Learning settings ranged across outdoor adventure education, school gardens, field trips, and traditional school subjects taught in natural environments. Study characteristics were summarized, and risk-of-bias tools assessed quality of research as generally moderate, although with a wide range. **The reported benefits of learning in natural outdoor settings include: increased student engagement and ownership of their learning, some evidence of academic improvement, development of social and collaborative skills, and improved self-concept factors** …
Nature-specific outdoor learning has measurable socio-emotional, academic and wellbeing benefits, and should be incorporated into every child's school experience with reference to their local context."

6. Field Lifespan and Usage Capacity

From page 12:

"Field-use Capacity and Lifespan A study conducted by the San Francisco Recreation & Parks Department estimates the average life span of artificial/synthetic fields is approximately 10 to 15 years. However, some manufacturers suggest that artificial grass can last up to 20 to 25 years with proper quality, installation, and maintenance[28]. The life span of a natural grass field varies depending on usage and maintenance but typically requires a major overhaul every ten years, maximum[29]. However, based on our experience, for optimal rehabilitation natural grass fields need to be rested each year during a growing season for a continuous and uninterrupted six to eight week period, then removed from service and replaced every five years."

[28] Bella Turf, 2024, How Long Does Artificial Grass Actually Last?, Available at https://bellaturf.ca/blog/how-long-does-artificial-grass-actually-last/#:~:text=Conclusion,and%20under%20the%20optimal%20conditions.
[29] San Francisco Recreation & Parks, 2005, Natural and Synthetic Turf: A Comparative Analysis, Available at: http://www.cityfieldsfoundation.org/Comparison_fieldturf.pdf

The links referenced to support this statement do not work. How can one trust this information if one cannot even read the report? Who sponsored these reports? What do they actually say?

7. Cost Comparisons and Alternative Natural Grass Models

What type of natural grass fields are they talking about that need resting and replacement. The study does not seem to take into account newer, more hearty, drought tolerant grasses, better irrigation systems and regenerative management practices that are producing amazing natural grass fields that rival artificial turf – without all the environmental and health harms of toxic plastic.

More statements below from the study that can be refuted by studies showing comparable usage on natural grass fields.

"The actual hours of use of an artificial turf field range from 1.7 to 7.7 times the use of natural grass fields, based on the consultant's 40 years of experience in the industry. "

"To maintain the same annual level of play currently sustained on the artificial turf field at Creekside Sports Park, the Town could require as many as seven or more natural grass fields."

For a valid report on usage of natural grass, properly managed fields, please check out the link below. One does not need 7 natural grass fields to get the same usage as one artificial turf field.

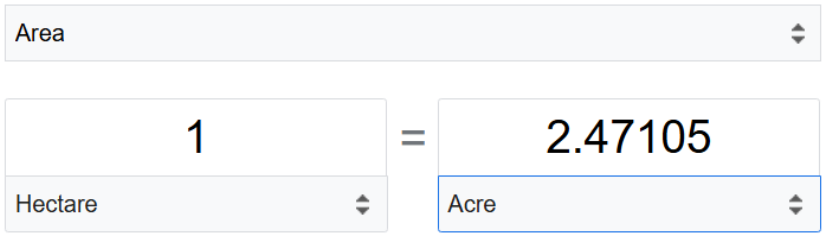
https://www.turi.org/content/download/12156/190509/file/Natural+Grass+Playing+Field+Case+Study+Springfield+MA.+June+2019.pdf

This conclusion on page 13 (shown below) does not take into account what I mentioned above: better grasses, good irrigation and proper maintenance.

"The one element in the comparison that must be understood is that natural grass systems do not accommodate the amount of usage hours annually that artificial turf systems do."

Then there is the consideration of the cost of artificial turf compared to natural grass. Below is information from Sydney, Australia with not only cost information but videos of why their natural grass field has succeeded and why both the sports groups and the environmental groups are very pleased!

A standard soccer field is usually **1.86 acres**, or 81,000 square feet. The FIFA recommends a minimum size of 1.59 acres and a maximum size of 2.07 acres.



A simple cost benefit analysis comparing natural and synthetic turf is all that is often needed to demonstrate how ridiculous synthetic is relative to natural (let alone all the environmental differences). In Sydney for example we recently constructed a natural turf site over 2 hectares in size for $1.2 Million, whereas another council in Sydney is currently constructing a synthetic field over a 1 hectare site which has so far cost more than $5.5 Million (more than 10 times more expensive, yet would have similar maintenance costs).

2 minutes of highlights from this playlist - Can grass fields be superior to plastic fields? Yes! - YouTube

MIDDLEHEAD OVAL CASE STUDY - AgEnviro Solutions (Dr Mick Battam) - YouTube

And finally, I'm including just one relatively current study that pretty much covers all the issues relating to natural grass vs artificial turf drawing the conclusion that natural grass wins.

Artificial Turf Versus Natural Grass: A Case Study of Environmental Effects, Health Risks, Safety, and Cost

https://www.mdpi.com/2071-1050/17/14/6292

screen shot from article:

5. Conclusions

Based on the research conducted, it is recommended that the Township of Verona should replace Centennial Field with a natural grass field. This conclusion was reached based on a combined consideration of all the findings. Specifically, natural grass was found to have a lower environmental impact, be more cost-effective in the long term, and have a lower safety risk in the dimensions of heat and chemical exposure. It was found that a well-maintained natural grass field, even when maintained traditionally with synthetic fertilizers, was found to create much lower levels of pollution. A well-maintained natural grass field was also found to contain fewer compounds that harm the environment and human health and have lower levels of emissions over its lifetime. Safety considerations as a whole also favor natural grass fields. Natural grass does not get as hot as artificial turf, decreasing the risk of heat exhaustion, and it has generally similar or slightly lower injury risks in the categories researched. Although technologies exist that decrease the heat on artificial turf fields, they still do not decrease heat to levels comparable to natural grass fields. Additionally, such technologies are more expensive and have far higher emission rates than traditional artificial turf. Natural grass on average also uses much more water over its lifetime, but other health and environmental considerations were found to outweigh this issue.

8. Request for Additional Review

Now – my own conclusion: There is enough concern about the study issue and materials within that the commission should not accept it and hopefully take the time needed to fully analyze the materials in it as well as comments you have or will be receiving from community members.

Thank you for this opportunity to address the commission and voice my concerns.

Sincerely,

Andrea Wald
Co-Founder, Community for Natural Play Surfaces

From:	Robert Hall
To:	PPW Comment
Cc:	Rob Moore; Maria Ristow; Mary Badame; Rob Rennie; Matthew Hudes
Subject:	6/1 Parks Commission, Public Comment Item #2
Date:	Sunday, May 31, 2026 9:07:25 AM

[EXTERNAL SENDER]

Dear Commissioners and Council Members,

Please think deeply prior to accepting the conclusions of Kimley-Horn. There is a lot at stake.

I. THE FRAMING OF THIS DECISION IS WRONG

An analysis on grass versus artificial turf should not be balancing children's safety against maintenance costs. The fact that it does reveals that the pressure to install synthetic turf is coming from operational interests, with health concerns treated as obstacles to manage rather than reasons to pause.

I oppose any artificial turf installation at Creekside Sports Park. The Kimley-Horn assessment and the staff report present this decision primarily as an operational and financial question, with public health and environmental impacts treated as secondary "disadvantages" to be weighed and managed. We reject that framing.

Children and families who use this park have a right to a playing surface that is not manufactured with known toxicants and persistent pollutants. The burden of proof must be on those who wish to install synthetic materials in a public space — not on the community to prove harm after the fact. On that standard, the case for artificial turf fails.

We call on the Commission to recommend natural grass restoration to the Town Council, and to reject all artificial turf alternatives.

II. PFAS: "FOREVER CHEMICALS" IN EVERY ARTIFICIAL TURF OPTION

The Kimley-Horn assessment acknowledges that artificial grass carpet and backing is typically manufactured with Per- and Polyfluoroalkyl Substances (PFAS) — commonly known as "forever chemicals" — regardless of the infill type selected. PFAS are associated with a wide range of serious health effects including immune system disruption, thyroid disease, kidney and testicular cancers, and developmental harm in children.

The assessment itself concedes that *"direct health effects of PFAS in artificial turf is difficult to determine as there are limited studies."* This uncertainty is not reassurance. Under any precautionary framework, known PFAS-containing materials should not be installed in a public park used by youth athletes unless the Town can affirmatively demonstrate the turf meets PFAS-free standards.

This is not a caveat buried in fine print — it is a structural feature of all artificial turf systems

currently on the market. Choosing BrockFill or PIVOT over crumb rubber does not eliminate PFAS exposure. It changes only the infill. The carpet — the surface children fall on, roll on, and breathe near — remains a PFAS-containing material.

We urge the Commission to require, as a condition of any artificial turf contract, that:

<!--[if !supportLists]-->• <!--[endif]-->The turf manufacturer provide a full material disclosure and certify the product is manufactured without intentionally added PFAS.

<!--[if !supportLists]-->• <!--[endif]-->Independent third-party testing verify PFAS levels in carpet backing prior to installation.

The Commission should ask staff directly: Has any manufacturer on the bid list provided a credible PFAS-free certification? If not, no artificial turf option is acceptable.

III. CRUMB RUBBER: THE CHEAPEST OPTION IS ALSO THE MOST DANGEROUS

Staff's report continues to list crumb rubber infill as a viable option — noting it is the lowest-cost alternative and citing it as the industry standard. We object to this framing. Crumb rubber derived from recycled tires contains a documented mixture of hazardous substances:

<!--[if !supportLists]-->• <!--[endif]-->Metals including zinc (at levels toxic to aquatic organisms), lead, and cadmium

<!--[if !supportLists]-->• <!--[endif]-->Polycyclic aromatic hydrocarbons (PAHs), many of which are known or probable carcinogens

<!--[if !supportLists]-->• <!--[endif]-->Volatile organic compounds (VOCs) including benzene, toluene, naphthalene, and styrene

<!--[if !supportLists]-->• <!--[endif]-->Over 350 distinct chemicals with potential to off-gas, leach, or become airborne as particles

<!--[if !supportLists]-->• <!--[endif]-->Potential latex allergens that may trigger allergic and asthmatic responses

The Kimley-Horn report itself notes that VOC emissions from recycled crumb rubber increase with temperature. Field surface temperatures on synthetic turf routinely exceed 150°F in direct sun — conditions under which these chemicals off-gas at their highest rates, directly into the breathing zone of athletes running on the field.

The State of California's March 2026 OEHHA report on synthetic turf — which the Town's own staff acknowledges was "long-awaited" by the public health community — must be reviewed and publicly presented before this Commission takes any vote. We request that the Commission defer its recommendation until that report has been formally presented and discussed.

Saving approximately $90,000–$140,000 in construction cost compared to PIVOT or BrockFill does not justify exposing children and youth athletes to avoidable chemical risks. No cost-benefit analysis makes that trade acceptable.

IV. HEAT: A HAZARD THAT ALTERNATIVES CANNOT SOLVE

The Kimley-Horn assessment acknowledges that artificial turf surfaces generate significantly higher temperatures than natural grass, and that alternative infills reduce heat by only five to ten degrees — offering "little benefits when surface temperatures exceed 150°F." Research has documented surface temperatures on synthetic fields exceeding 150°F to 200°F under direct sunlight.

This is not a manageable risk — it is an inherent property of all synthetic surfaces. No infill selection resolves it. The Commission should be clear-eyed: recommending any artificial turf system means recommending a surface that will regularly reach temperatures capable of causing burns on contact and significantly elevating heat illness risk for youth athletes during summer practices and games.

We recommend the Commission require — at minimum, should artificial turf proceed despite our opposition — that:

- <!--[if !supportLists]-->• <!--[endif]-->Clearly posted heat advisory signage specify conditions under which use must be modified or suspended.
- <!--[if !supportLists]-->• <!--[endif]-->A formal heat management protocol be included in all user permit agreements, especially for youth leagues scheduling summer practices.
- <!--[if !supportLists]-->• <!--[endif]-->Shade structures be evaluated for the east and west sidelines to reduce radiant exposure.

V. ENVIRONMENTAL HARM: RUNOFF, MICROPLASTICS, AND CARBON

A. Stormwater Runoff and Water Quality

The report confirms that artificial turf, classified as an impervious surface, generates greater stormwater runoff than natural grass. Multiple independent studies have found artificial turf produces higher runoff volumes and lower rainfall infiltration than living turf. The Kimley-Horn assessment further acknowledges that contaminated runoff from artificial turf — carrying zinc, PAHs, and microplastics — poses real water quality risks.

Notably, the assessment itself concedes that an organic natural grass alternative *"would not result in water quality issues and water pollution."* That sentence should be the end of the environmental analysis. The Commission's own consultant acknowledges that natural grass is the water-safe choice.

B. Greenhouse Gas Emissions

The Kimley-Horn report acknowledges that greenhouse gas emissions associated with artificial turf are greater than natural turf, and that natural grasses sequester greenhouse gas emissions unlike artificial turf. A 2021 Life Cycle Assessment by Zurich University of Applied Sciences found that filled artificial turf fields produce the highest greenhouse gas emissions per hour of use among all surface types studied. Given the Town's General Plan sustainability commitments, this is not a minor consideration — it is a direct conflict with stated Town policy.

C. End-of-Life Disposal: A Landfill in Ten Years

The Kimley-Horn report acknowledges that mechanical recycling of artificial turf "has been difficult to implement" due to the diversity of materials in turf yarn and backing. Chemical recycling faces its own challenges. The practical reality is that most artificial turf ends up in landfills. A 70,600 square foot field represents a substantial volume of synthetic material — carpet fibers, crumb rubber, and backing — that will need to be disposed of in 8-10 years.

The Commission should understand that voting for artificial turf today is also voting for a future landfill disposal problem. No vendor has offered a financially guaranteed recycling plan. The Town should not accept that liability.

VI. NATURAL GRASS IS VIABLE AND COST-COMPETITIVE AT REALISTIC SCALE

The staff report and Kimley-Horn assessment portray natural grass as prohibitively expensive and operationally impractical. We challenge both assumptions.

A. Recent Real-World Natural Grass Costs

Recent examples of natural grass installations completed at comparable facilities demonstrate that high-quality fields can be delivered at far lower costs than the Kimley-Horn lifecycle model suggests:

- <!--[if !supportLists]-->• <!--[endif]-->Newport Harbor and Costa Mesa High Schools — Football field renovations: $166,020 + $16,000 bid allowance
- <!--[if !supportLists]-->• <!--[endif]-->Blair Park, San Bernardino (May 2024) — Three baseball diamond renovations in conjunction with Dodgers Foundation: $390,000
- <!--[if !supportLists]-->• <!--[endif]-->LA Chargers Practice Fields (June 2024) — Three field installations, 220,000 sq ft: $4,000,000
- <!--[if !supportLists]-->• <!--[endif]-->UCLA Soccer Fields renovation (June 2024): $550,000
- <!--[if !supportLists]-->• <!--[endif]-->LA Football Club Practice Fields renovation (July 2024): $60,000
- <!--[if !supportLists]-->• <!--[endif]-->Point Loma Nazarene University, San Diego (August 2024) — Irrigation systems, baseball and football field installations: $1,400,000

B. Current Sod Pricing (April 2025)

West Coast Turf current wholesale pricing for Bermuda hybrid sod (April 2025):

- <!--[if !supportLists]-->• <!--[endif]-->$0.60/sq ft for Coachella, Tahoma, Tifturf, and Santa Ana varieties
- <!--[if !supportLists]-->• <!--[endif]-->$0.58/sq ft for other Bermuda varieties
- <!--[if !supportLists]-->• <!--[endif]-->Delivery: $100 for 500–1,000 sq ft; $50 for anything over 1,000 sq ft
- <!--[if !supportLists]-->• <!--[endif]-->For a regulation-sized 84,000 sq ft playing field: $50,450 in sod materials alone
- <!--[if !supportLists]-->• <!--[endif]-->All grown in Coachella Valley for the Los Angeles/Southern California region

Note: Excludes design, CEQA filings, soil testing, amendments, irrigation/drainage systems, and installation labor.

These figures demonstrate that the material cost of natural grass sod for a field the size of Creekside is approximately $50,000 — a fraction of any of the artificial turf alternatives under consideration. The Kimley-Horn lifecycle cost model's conclusion that natural grass costs $801 per use over 20 years is driven by assumptions about usage intensity (2,120+ hours/year) that reflects a policy choice, not a physical constraint. The Town could choose to manage field usage differently. It cannot choose to make artificial turf PFAS-free.

VII. MY REQUESTS TO THE COMMISSION

I ask the Commission to take the following actions at this meeting:

<!--[if !supportLists]-->1. <!--[endif]-->Defer any vote on a recommendation to Town Council until the California OEHHA March 2026 synthetic turf report has been formally presented, reviewed, and discussed on the public record.

<!--[if !supportLists]-->2. <!--[endif]-->Direct staff to return with a natural grass restoration option that reflects current market pricing, including the West Coast Turf wholesale rates above, and revised usage management scenarios that reduce annual hours to a level natural grass can sustain.

<!--[if !supportLists]-->3. <!--[endif]-->Exclude crumb rubber infill from further consideration. Its documented chemical hazards, combined with the availability of alternatives, make it indefensible as a public health matter.

<!--[if !supportLists]-->4. <!--[endif]-->If the Commission proceeds toward any artificial turf recommendation despite this opposition, require mandatory PFAS-free certification, vendor-backed recycling guarantees and evidence of past recycling promises met, robust leachate-specific stormwater filtration, and a formal heat management protocol as non-negotiable contract conditions.

<!--[if !supportLists]-->5. <!--[endif]-->Commission an independent health impact assessment — separate from the Kimley-Horn operational analysis — that specifically evaluates PFAS exposure, VOC off-gassing, and microplastic ingestion risks for youth athletes using the field at the currently projected 2,120 annual hours of use.

VIII. CONCLUSION

The children and families who use Creekside Sports Park deserve better than a cost-optimized synthetic surface that generates PFAS exposure, chemical off-gassing, toxic runoff, and a landfill problem in fifteen years. Natural grass — the surface children have played on throughout human history — is available, affordable at the sod level, and free of the chemical hazards inherent in all synthetic turf systems.

I urge the Commission to stand on the right side of this question: children's health over operational convenience.

Sincerely,

Bob Hall

From:	Susan Hinton
To:	PPW Comment
Subject:	Parks & Sustainability Commission 6/1; Public Comment Item #2. Creekside Park Turf Repair (Written Report)
Date:	Sunday, May 31, 2026 9:48:17 AM
Attachments:	Screenshot 2026-05-29 at 18.17.37.png Screenshot 2026-05-29 at 16.41.02.png Screenshot 2026-05-29 at 18.03.55.png

[EXTERNAL SENDER]

Subject: Public Comment on Item #2. Creekside Park Turf Repair (Written Report)

Dear Los Gatos Parks and Sustainability Commissioners,

I urge the Parks and Sustainability Commission to reject, that is to not accept, Kimley Horn's Creekside Sports Park Artificial Turf Replacement Assessment.

This request is based on the odd and inconsistent life cycle and installation costs listed on

- page 16, **Table 4:** Comparison of Natural Grass Field and Artificial Turf **Life Cycle Costs (20 Year Cycle) with 3% Annual Escalation**
- page 15, **Table 3:** Comparisons of Conceptual **Installation Costs** for Artificial Turf Fields and Natural Grass Field.

According to costs listed on page 16 in the Table 4 box titled "Natural Turf Field," the entire field must be "refurbished" every 4 years, meaning, one assumes, that the entire field must be resodded every 4 years. This overall cost, resodding 5 times over 20 years, is said to total $4,428,000. A curious person would want to how this figure was determined.

Table 4: Comparison of Natural Grass Field and Artificial Turf Life Cycle Costs (20 Year Cycle) with 3% Annual Escalation

Note that on the previous page, 15 of 108, the **Table 3 box Natural Grass Field Replacement, puts the cost of "furnishing and installing sod" at $211,800**. So if this was redone every 4 years — which is not needed at other successful grass sports fields — the total cost would be:

5 x $211,800 = $1,059,000

Now one might argue - "But if the cost goes up by 3% every single year, this will give a much much larger cost over 20 years." However, doing so yields:

every 4 years with an annual 3% inflation:
$238,383 (year 4) + $268,302 (year 8) + $301,976 (year 12) + $339,877 (year 16) + $382,534 (year 20) = Total $1,531,072

which is still less that $4.4 million.

Table 3: Comparisons of Conceptual Installation Costs for …
Natural Grass Field Replacement

Landscape and Irrigation					
9	Shrubs (Bioswale)	625	SF	$6.00	$3,750
10	No-float Compost Mulch (Bioswale)	625	SF	$0.50	$313
11	Soil Prep and Amendments (6" deep) to Remediate Lime-Treated Soil	70,600	SF	$0.50	$35,300
12	Install Drain Rock Layer for Sod (4" deep)	870	CY	$100.00	$87,000
13	Install Sand Base for Sod (9" deep)	1,960	CY	$45.00	$88,200
14	Furnish and Install Sod	70,600	SF	$3.00	$211,800
15	Irrigation System (Overhead Spray)	70,600	SF	$4.00	$282,400
16	120 Day Maintenance Period	1	LS	$24,000.00	$24,000
				Subtotal	$732,763

Also note there's an additional consistency problem because the carpet replacement cost is not increased in a similar fashion.

I say this because **today, at the end of May 2026, replacing the plastic turf carpet and refurbishing everything that goes with it — which is what they are proposing to do now at the existing Creekside Sports field** (and which was originally installed 14 years ago, in 2012) according to them in Table 3:

> **Replacing & refurbishing artificial turf in 2026 costs between: $1,174,071 and $1,343,511.**
>
> *So increasing this amount by 3% every year for 12 years means that in 2038, 12 years from 2026,*
>
> > **Replacing and refurbishing artificial turf will cost between $1,673,945 and $1,915,525**
> >
> > **Here is a calculation table showing a 3% increase over 12 years for the cost of $1,174,071.** This demonstrates that $1,174,071 today will be inflated to $1,673,945 by 2038, in 12 years.

1	$1,174,071.00	$35,222.13	$1,209,293.13
2	$0.00	$36,278.79	$1,245,571.92
3	$0.00	$37,367.16	$1,282,939.08
4	$0.00	$38,488.17	$1,321,427.25
5	$0.00	$39,642.82	$1,361,070.07
6	$0.00	$40,832.10	$1,401,902.17
7	$0.00	$42,057.07	$1,443,959.24
8	$0.00	$43,318.78	$1,487,278.02
9	$0.00	$44,618.34	$1,531,896.36
10	$0.00	$45,956.89	$1,577,853.25
11	$0.00	$47,335.60	$1,625,188.84
12	$0.00	$48,755.67	$1,673,944.51

$1,673,945 to $1,915,525 for refurbishing an artificial turf field in 12 years therefore clearly costs more than resodding a grass field every 4 years.

The foregoing ought to be enough evidence showing that the consultant report figures are not consistent, and therefore the report should not be accepted.

—

However there is more. For example, the stated artificial turf Maintenance Cost in the document, put at $16,400 annually for the first year, is already too low.

A quick look at a real world Los Gatos Town memo written expressly for artificial turf maintenance over a 5 year period **states that, in Fiscal Year 2026-27, "Turf Maintenance at Creekside Sports Park … [includes] a Base Year Not-To-Exceed Amount of $27,690,"** that that there will be inflationary increases going forward. ($27,690 in the real-world memo is clearly larger than Kimley Horn's estimate of $16,400.)

> **Town of Los Gatos Memo from May 5, 2026**
> https://mccmeetingspublic.blob.core.usgovcloudapi.net/losgatos-meet-3744f4da1cc54d5bb6ac8bdea3608087/ITEM-Attachment-018-8e58f5a144404f6289457ef99f4990a1.pdf
>
> "**Authorize the Town Manager to Execute a Five-Year Agreement for Services with FieldTurf USA, Inc. to Perform Turf Maintenance at Creekside Sports Park with a Base Year Not-To-Exceed an Amount of $27,690 for FY 2026-27 and Subsequent Annual Adjustments Based on the Consumer Price Index**"
>
> Note that the Los Gatos City Council approved the payments to FieldTurf; Item 6 in the May 5, 2026 Council Meeting minutes was passed unanimously after discussion.
> https://mccmeetings.blob.core.usgovcloudapi.net/losgatos-pubu/MEET-Minutes-3744f4da1cc54d5bb6ac8bdea3608087.pdf

Again, the foregoing ought to be enough evidence showing that the consultant report figures are unrealistic, and therefore the report should not be accepted.

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Now I would also like to turn to the end of the document, to look at the three documents attached in the Appendix — **Appendices A, B, and C**.

On page 24 of 108, **Appendix A references a 2011** "Review of Benefits and Issues Associated with Natural Grass and Artificial Turf" playing fields, as though there have not been advances or interesting new topics in the past 15 years. **Rather than go line by line through this 74 page document, I would like to bring attention to more recent documents, from 2025.**

The following comparison documents focus on sustainability as well as on cost which should be of particular interest, given that Los Gatos co-locates responsibility for its parks and sustainability in the Parks and Sustainability Commission:

> Montclair State University (June **2025**): **Published in Sustainability, this case study highlights the environmental risks and cost inefficiencies of artificial turf compared to managed natural grass.**
> https://www.mdpi.com/3396042

> University of British Columbia (August **2025**): **Dr. Natasha research for the UBC Sustainability Scholars Program concludes that artificial turf undermines municipal climate goals.**

https://sustain.ubc.ca/sites/default/files/2025-042_Understanding and Managing Artificial Turf_Klasios.pdf

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On page 99 of 108, **Appendix B** references a 2021 document from Zurich, Switzerland, which on page 100 includes a **disclaimer: "**This report is based on sources believed to be reliable. **The ZHAW and the authors give no guarantee as to the completeness of the information provided and disclaim any legal liability for damages of any kind."** Note that such a disclaimer is unusual for vetted scientific studies.

Furthermore this **study relies on a widely discredited model of Life Cycle Assessment (LCA) "analysis," well known to have scoping problems, data gaps and subject matter omissions due to difficulties in assessment, as well as the fact that such assessments can be and have been steered to meet foregone conclusions.**
(https://www.bakerinstitute.org/research/sustainability-and-life-cycle-assessments-occams-razor-does-not-apply and https://incpen.org/limitations-of-lifecycle-assessment-lca-carbon-measurements/)

> **Even Wikipedia recognizes critques of the "LCA" (Life Cycle Approach) assessment:** https://en.wikipedia.org/wiki/Life-cycle_assessment
>
> "Criticisms have been leveled against the LCA approach, both in general and with regard to specific cases (e.g., in the consistency of the methodology, the difficulty in performing, the cost in performing, revealing of intellectual property, and the understanding of system boundaries). When the understood methodology of performing an LCA is not followed, it can be completed based on a practitioner's views or the economic and political incentives of the sponsoring entity (an issue plaguing all known data-gathering practices)."

In short, LCA is neither thorough nor reliable, perhaps explaining why the study's authors felt compelled to include a disclaimer.

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On page 108 of 108, note that **Appendix C references two studies, both by Kimley Horn**, referred to as "this consultant**."**

Both Kimley Horn studies, the **Charlotte-Mecklenburg Study** and the **Denver Study**, are short on details. No date supplied for either study. There is no URL leading to a more complete document. Instead there are a few bullet points providing figures with no reference or backup material.

As seen above, calculations and figures presented in Kimly Horn's current document are demonstrably inconsistent, raising serious questions about its reliability.

For these reasons I again urge the Parks and Sustainability Commission not to accept Kimley-Horn's Creekside Sports Park Artificial Turf Replacement Assessment.

Sincerely,

Susan Hinton
Plastic Pollution Prevention Committee Chair
Sierra Club Loma Prieta Chapter

https://www.sierraclub.org/loma-prieta/plastic-pollution-prevention

From: Leanne McAuliffe
To: PPW Comment
Subject: Public Comment for June 1, 6pm meeting, Other Business, Item 2 - Creekside Park Turf Repair
Date: Sunday, May 31, 2026 10:39:46 PM

[EXTERNAL SENDER]

Dear Parks and Sustainability Commissioners,

Public Comment: June 1, Agenda Item 2 under Other Business - Creekside Park Turf Repair

I am deeply concerned that a "final" Kimley-Horn report, which allowed no opportunity for any input from the public or independent experts, was only made available for the first time this past Friday and may be used to guide a recommendation to the Town Council tomorrow (Monday).

The Parks and Public Works Director has stated their recommendation is based on two things, The Kimley-Horn Report and the OEHHA Report. The former is wholly lacking in its current state and is largely based on 15 year old data, and the OEHHA report does not give artificial turf a clean bill of health by any means. I can elaborate on this with data and references IF given sufficient time. One weekend, which I had already booked up, is not sufficient time.

I therefore request that the Parks and Sustainability Commission pause both acceptance of the report and any consideration of a recommendation to Town Council and allow sufficient time to:
a) seek public and independent expert feedback and incorporate it into the report and
b) actually process the copious amounts of information in the more complete report.

Please, do not accept the Kimley-Horn Report in its current state.
Please, do not make an underinformed recommendation to the Town Council at this time.
Please, allow a reasonable amount of time to receive and incorporate public comment.
(Afterall, it's not like you are replacing the field anytime soon since a contract was just approved for maintenance of the current field for 5 years.)

This report, once accepted, will be on record and inform future decisions so now is the time to get it right.

Kind regards,

Leanne McAuliffe
Very concerned resident, Los Gatos

From: Zack Holm
To: PPW Comment
Subject: Creekside Sports Park Artificial Turf
Date: Monday, June 1, 2026 3:37:00 AM

[EXTERNAL SENDER]

Dear Members of the Parks and Sustainability Commission,

I am a sports field management professional with over 15 years of experience managing and consulting on athletic fields at the municipal, collegiate, and professional levels. After reviewing the Creekside Sports Park Artificial Turf Replacement Assessment, I wanted to share a few observations.

First, the report itself acknowledges several environmental sustainability advantages of natural grass, including carbon sequestration, lower surface temperatures, reduced runoff, and the absence of microplastic concerns associated with synthetic turf. These considerations seem particularly relevant when evaluating a project through a sustainability lens.

Second, the report makes claims regarding natural grass field reconstruction and replacement cycles that do not reflect my professional experience. The suggestion that a natural grass field must be removed and replaced every four to five years is simply not representative of properly designed, constructed, and maintained sports fields. Well-managed natural grass fields can remain in service for decades with routine renovation practices such as aerification, overseeding, topdressing, and periodic surface restoration.

Finally, I am concerned by the report's characterization of field-use capacity. The document suggests that good field conditions are limited to approximately 200 hours of annual use. Field performance is driven primarily by maintenance practices, resources, and management, not by a single annual-use threshold. A field receiving only 200 hours of use with inadequate maintenance can still perform poorly, while properly maintained fields can sustain substantially higher use. I have personally managed professional natural grass fields exceeding 500 hours of annual use without the use of sod replacement while maintaining high-quality playing conditions professional soccer players expect.

I encourage the Commission to seek additional input from experienced sports turf managers and field operators before accepting assumptions regarding natural grass performance, lifecycle costs, and usage capacity. The choice between natural grass and synthetic turf should be based on realistic maintenance expectations and current industry best practices rather than generalized assumptions about play-hour limitations

Thank you for your time and consideration.

Zack Holm, CSFM

From: Leanne McAuliffe
To: PPW Comment
Subject: Public Comment - Meeting June 1, 6pm - Other Business - Item 2 - Creekside Park Turf Repair
Date: Monday, June 1, 2026 10:40:50 AM

[EXTERNAL SENDER]

Dear Parks and Sustainability Commissioners,

Public Comment - Meeting June 1, 6pm - Other Business - Item 2 - Creekside Park Turf Repair

One note on PFAS and plastic turf. The report itself states the focus on PFAS in plastic turf is recent. True. The presence of PFAS in plastic turf was only discovered in 2019 by an independent scientist after plastic turf industry reps had denied for the longest time that PFAS were used in their product. This discovery being recent also means the environmental and human health implications of the PFAS presence in plastic turf is yet to be established. So:

- Does it make sense to accept this report and essentially subject kids to this unknown risk of plastic turf throughout the crucial developing years of their lives?
- Does it make sense to recommend that this huge 70,000ish square feet of PFAS laced plastic turf be installed in the environment for the kids to play on as it slowly disintegrates to pollute the soil, air and water and potentially the kids themselves?

To date, there is no such thing an plastic turf product having no PFAS. Industry has constructed it own way of defining PFAS Free which does not equate to zero PFAS. See attached image.

Palo Alto recently installed a plastic field and tested for PFAS ***after*** installation. (Yes, a decision that was consciously and collectively made.) The testing result on two samples (without identifying which PFAS) identified a total amount of PFAS at 8,700,000 and 11,000,000 parts per trillion. The drinking water limit for PFOA and PFOS is 4 (yes, FOUR) parts per trillion. Requests to Palo Alto to do further testing to identify which PFAS these are are no long being responded to. It seems Palo Alto are satisfied with being told by industry that these PFAS were unintentionally added. Here is where I stand on that as a consumer and parent who cares about our kids health, which means I have to care about their environment as a whole. **IT DOES NOT MATTER** if the PFAS were intentionally added or not. The fact is they are there. So there is a duty to establish what PFAS they are and how much of each there is. There is also a duty to test ***before*** installation. This not only helps inform immediate decisions, like whether to install or not, but, should a decision be made to install plastic turf regardless of PFAS presence, it will help with major future decisions like how to remediate pollution, and how to address and reduce litigation costs (being able to prove the absence of substances) and it will allow the purchaser to ensure compliance with PROP 65 as new PFAS get added to the list.

When the holistic picture of unsustainable plastic grass is considered it's hard to see how it can be recommended over sustainable natural grass aside from a "perceived" ability to provide more hours. Even if slightly more hours are achievable, are all the short and long term trade offs in every other aspect with plastic turf worth it? I therefore request that the Parks and Sustainability Commission do not accept the Kimley-Horn Report at this time and that any recommendation on the Creekside field be paused until sufficient time has been given to allow for the Kimley-Horn Report to comprehensively incorporate information on PFAS in plastic turf and the risks that pertain therein.

Leanne McAuliffe
Resident of Los Gatos

Side note for the Parks and ***Sustainability*** Commission

No, PFAS (per- and polyfluoroalkyl substances) are universally considered unsustainable.

[1, 2, 3, 4]

Known as "forever chemicals," they are completely incompatible with the principles of sustainability and green chemistry due to the following reasons: [1, 2, 3, 4]

- Extreme Persistence: PFAS contain exceptionally strong carbon-fluorine bonds that do not break down in nature. They can linger in the environment for thousands of years, contaminating soil and water systems. [1, 2]
- Bioaccumulation: Because they do not degrade, these chemicals accumulate in the bodies of humans, wildlife, and throughout the food chain. [1, 2]
- Toxicity and Health Risks: Exposure to even low concentrations has been linked to severe health issues, including certain cancers, liver and kidney damage, reproductive harm, and weakened immune systems. [1, 2, 3]
- Strict Global Phase-Outs: Major regulatory bodies consider them a severe hazard to future generations, actively phasing out non-essential uses and regulating them in drinking water. [1, 2]

Because of their environmental and biological persistence, many sustainability experts recommend avoiding PFAS entirely and phasing them out in favor of degradable, non-toxic alternatives. [1]