

## **Comment Submitted on Regulations.gov**

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### **Comment:**

On behalf of Friends of Sligo Creek, we express our strong opposition to any DOI or interagency effort to include synthetic turf as part of the America the Beautiful initiative.

Friends of Sligo Creek is a nonprofit organization dedicated to protecting, improving, and appreciating the ecological health of Sligo Creek Park and its surrounding watershed in Montgomery and Prince George's counties in Maryland.

We have read that DOI is considering including synthetic turf as "conserved land" in its work. If this reporting is accurate, the inclusion of synthetic turf in this initiative gives a lie to a project which emphasizes nature, the health of Americans and the restoration of the natural world. Synthetic turf has no place in this initiative. In fact, overall it should be eliminated as natural land is reclaimed and thus conserved.

It is documented that synthetic turf carpeting and tire/synthetic rubber surfaces are damaging and dangerous to people's health and well-being. Scientific research identifies a number of toxic chemicals (including some forever chemicals) and petroleum products present in synthetic turf (even so-called next generation products) and rubberized surface products. As well, synthetic turf surfaces are always the hottest around, by far. On hot days which are increasingly common, they make surroundings even hotter and pose a risk to anyone coming in contact – particularly children.

In view of the chemical content of synthetic turf and consequent effects on the living world, it is impossible to understand how this could be part of an America the Beautiful initiative. In its America the Beautiful report, DOI states "we know that nature is essential to the health, well-being, and prosperity of every family and every community in America" and "President Biden has issued a call to action that we work together to conserve, connect, and restore 30 percent of our lands and waters by 2030 for the sake of our economy, our health, and our well-being".

Synthetic turf also poses a very tough waste disposal challenge (including its tendency to shred while in place), which is also degrading our natural spaces, air and waters today. With the toxic chemical composition, the heat problem and waste disposal challenge, the inclusion of synthetic turf in this initiative would also contravene the basic climate change agenda of President Biden's Executive Order 14008, Tackling the Climate Crisis at Home and Abroad.

Moreover, the UN - supported by the Administration - is making considerable progress internationally in limiting plastics, which have degraded our lands, water and air. Synthetic turf consists significantly of plastic and is a candidate for banning – not protecting (or conserving).

Thank you for your consideration on this issue.

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