

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST DISTRICT OFFICE
89 S. CALIFORNIA STREET, SUITE 200
VENTURA, CA 93001
(805) 585-1800



W13.1a

ADDENDUM

December 12, 2023

TO: Coastal Commissioners and Interested Parties

FROM: South Central Coast District Staff

SUBJECT: **ADDENDUM TO ITEM W13.1a, Notice of Impending Development UCS-NOID-0002-23 (Baseball Stadium Turf) FOR THE COMMISSION MEETING OF Wednesday, December 13, 2023**

I. CORRESPONDENCE RECEIVED

The purpose of this addendum is to address comments in letters received following publication of the staff report. A total of 13 letters were received, with six in support of the staff recommendation and seven in opposition. All letters have been included in the correspondence document posted with the staff report on the Commission's online agenda.

The majority of the seven letters in opposition were submitted by the applicant, their representatives, and industry representatives supportive of artificial turf technology. Letters in opposition to the staff recommendation assert that the proposed project would result in significant water savings and would not result in water quality impacts, end of life disposal challenges, or offsite migration of field debris that could result in microplastic pollution. These topics were addressed in the staff report.

Letters from representatives of AstroTurf and Brock USA provided additional information on the chemical composition of the materials that would be used in the proposed artificial turf field. These letters indicate that the AstroTurf field materials (grass, carpet backing) and the underlying Brock USA shock pad have each been thoroughly tested for per- and polyfluoroalkyl substances (PFAS). Specifically, the commenters assert that the field materials (grass, carpet backing) do not contain PFAS compounds within detectable limits, and the underlying shock pad does not contain PFAS compounds or organic fluorine. The letter from Brock USA also indicates that the proposed woody infill would promote evaporative cooling at the field due to natural absorbency and that the shock pad has a 25-year lifetime. According to comments received from AstroTurf, the field (which, according to UCSB has a ten-year lifetime), can be recycled at "TRP facilities" (acronym unknown). It

appears that the closest TRP facility is located in Banning, CA, nearly 200 miles from UCSB. No further details regarding recycling feasibility were received.

Additionally, the letter from AstroTurf asserts that the proposed field would result in water savings of 2.5M gallons annually. In a separate letter from UCSB in response to the staff report, they assert that the field would result in water savings of 3.0M gallons annually. Neither assertion was supported by additional detail or analysis, and both differ from figures previously provided by UCSB which state that the proposed field would require 12,000 gallons annually— compared to the 45,000 gallons required annually for the current natural turf field. Regardless of the differing quantities, these figures do not address the primary concern in relation to water demand, which is the proposed switch from use of reclaimed water to the use of potable water, which is a resource of much greater value in a region with high water demand and known to be impacted by drought conditions of increasing frequency and severity.

Finally, while several letters of opposition assert that the proposed project would successfully mitigate for the potential of field debris and microplastics to be transported offsite and into nearby waterways and other sensitive habitats, no additional information or analysis was provided that includes a description of microplastic transport and transport mitigation beyond the material previously reviewed by staff.