

From: [Andrea Wald](#)
To: [PlanningCommission AP](#); [Green AP](#)
Subject: Study Session - Agenda item A - 6/23 mtg
Date: Thursday, June 18, 2026 10:05:53 PM
Attachments: [Fake Grass Real Issues - 42 pg report from Milbrae.pdf](#)

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Dear Commissioners and staff,

The Study issue you are going to be discussing on Monday – ESD24-01 – focuses a great deal on how the city should manage parks related to the ground cover – being either artificial turf or natural grass. This study issue was supposed to look into these two ground covers for residential and commercial properties as well. I do not believe it provided enough researched material nor feedback for any concrete actions on behalf of the city. I firmly believe that artificial turf has no place in our parks, schools or private properties.

It seems as though in the Parks and Rec commission mtg on 6/10 and the Sustainability commission mtg on 6/15 there was a great deal of discussion, community comments, commissioner questions and input regarding Sunnyvale owned property (parks and also school grounds that the city manages) but very little in regards to private property. Therefore, in this email I am only focusing on private property as I believe the city can and should be more proactive in how they address the MANY artificial turf installations I am seeing all over Sunnyvale.

The community outreach that was done with questions about residential use of artificial turf assumed that those responding are aware of all the known and researched harms of artificial turf. They believe sales pitches by vendors who are profiting from promoting this toxic, non-sustainable, harmful material as saving water and maintenance free.

I support a ban on artificial turf for all private property although I am concerned this is something that the city would have a hard time to vote for, even though there are two other places that I know of that have officially banned it for all private landscaping.

Please see below:

The City of San Fernando has a landscape ordinance that includes a ban on [artificial turf installations](#), Sec. 106-347 and Sec. 106-351.

Within their ordinance are two areas that directly relate to artificial turf.

Sec. 106-345. - Landscaping standards

(6) No vehicle shall be parked in a required landscape area.

Sec. 106-347. - Plant materials and planting standards.

Plant materials shall be of a type and placement compatible with the project site and surrounding land uses as follows:

(1) Artificial turf is prohibited.

The city of Millbrae also passed a ban on artificial turf not just for private property but for all city owned land. Please see the attached document: Fake Grass Real Solutions - the report upon which they voted to ban artificial turf. A great deal of very relevant information that can be applied to our Sunnyvale landscape.

<https://www.ci.millbrae.ca.us/276/Prohibition-of-Artificial-Turf>

Another good source of info on why artificial turf is not needed for private properties can be found in the article below:

<https://sustainablesanmateo.org/sustainability-ideas-bank/>

If the city is not prepared to take the bold move and ban artificial turf for private property I would like to suggest that they institute a permitting process before any artificial turf can be contracted and installed.

I believe most people who install artificial turf on their properties (apt complexes, gas stations, commercial properties, individual homes) are not at all familiar with the product: what it is made of, researched harms to the environment and our health, microplastic shedding into our waterways and eventually our drinking water and our bodies, chemicals that it might contain, excess heat, etc. Brochures only state that artificial turf needs no watering and takes less maintenance. There is not even any mention of what they should do with it once it wears out or they simply want to remove it.

There are no recycling facilities in CA. Worn out artificial turf (12 large athletic fields from the high schools in the Fremont Union High School District) were supposed to be recycled. They actually ending up being shipped to Oregon, infill removed, then the blades and plastic backing supposedly went to another facility in Lincoln, CA called Circular Polymers. Their website talks about recycling old carpet, but no mention of artificial turf. There is no way to verify what actually happened to this material and according to what was stated at a recent Foothill-De Anza College meeting, it seems as though there is no recycling in California. And mentioning that it is recycled because it is made into small pieces for other uses (batting cages, dog parks, residences, etc – all at a very discounted rate) is not recycling – that is “repurposing”. Eventually all those pieces will wear out and will need to be disposed of!

Listen to 5 minutes of the 6/8/26 FHDA board meeting from timestamp 2:15:52 -

2:20:45

https://www.youtube.com/live/MdJ5QUrRUDI?si=xY6-F2tZ8nSsrz_y&t=8152

One artificial turf vendor claims that his company recycles artificial turf in Louisiana. He made this statement at both the Parks and Rec commission and Sustainability commission meetings.

Upon further research I found out that there is a facility in Baton Rouge, Louisiana, owned and operated by TenCate but that they basically remove any infill materials, which they claim can be reused, but that the blades and backing material is shipped off to a facility in Texas for recycling. What happens in Texas is that plastic is incinerated. Not so sure I'd call that recycling.

Feel free to check out the TenCate website:

<https://turfreycling.us/#theprogram>

From the website: "We've launched a recycling solutions pilot program".

Notice the word: PILOT. Many entities keep us hooked because they claim to be fixing issues, but many fail – just like the actual recycling facilities that were supposedly going to handle all AT recycling. That company as ReMatch – which never fully operated (too expensive) and filed for bankruptcy. Below just one of many articles about this failure to succeed.

<https://www.ydr.com/story/news/environment/2026/02/02/artificial-turf-pa-cleanup-re-match/87949674007/>

All this leads me to some questions that should be asked of staff and possibly the consultant:

This issue of recycling of artificial turf in residential applications or smaller uses other than a sports field are of concern. Will they be trucked to someplace to dispose of them? Will they end up in landfill? How does Sunnyvale handle residential artificial turf at the end of its life? Does it go to the Waste Station? Do residents simply put into their own garbage cans?

Please realize, even if there was a possibility to recycle old artificial turf, it makes absolutely no sense to ship the smaller pieces that are used on private properties to Oregon, Lincoln, CA and especially not to Louisiana. The answer: LANDFILL!

As I see more and more artificial turf installations throughout the city I'm concerned about lack of accountability and harms that this will eventually cause us all.

I'd like to suggest that the city consider a permit process that could include a fee for not only the permit but for cost of sending it to landfill at the end of its useful life or when a someone just wants to take it out. Vendors do charge for dealing with the AT from fields – one fee to handle locally and a different, higher fee for shipping back east. I also recommend that the permit process include an educational portion: all about AT, what its made from, possible harms to the environment and health, heat one can be exposed to, how one might dispose of it, etc. and also substantial info on Valley Water's stance on AT and their rebate program.

As a final note, I'd like to share a few of the photos that I've saved that I hope will enhance my reasons for why artificial turf is not needed nor beneficial in our neighborhoods or on any private properties.

This for sure would be prohibited in San Fernando – both the artificial turf and the car parked on it!





Even if the AT is new and has not yet had a chance to grow weeds or fall apart, which would you prefer?

This:



Or this?



Thank you for taking the time to look into and address my concerns.

Andrea Wald, Sunnyvale resident

Fake Grass, Real Issues: Should You Regulate Artificial Turf in your Community?

Andrew Mogensen, AICP - Community Development Director, City of Millbrae

Darcy Kremin, AICP - Senior Principal Planner, ESA

Marina Khrustaleva - Associate Planner, City of San Fernando

Yes, you should

Artificial grass is not without consequences

If it isn't in your community yet, it will be soon

From 2011 and 2016, California faced one of the driest periods in its recorded history.

Governor Brown signed a law in 2016 prohibiting local agencies from banning or regulating artificial turf in an effort to encourage landscaping alternatives that use less water.

Unintended consequences led to the passage of Senate Bill 676 last year, restoring local agencies' ability to regulate artificial turf.

It also ended rebates for the installation of artificial turf as drought-tolerant landscaping.

Why Regulate Artificial Turf?



- Health and Safety of Synthetic Materials
- Environmental Impact
- Stormwater Capture and Percolation
- Quality and Appearance
- Ensure Maintenance and Durability

Millbrae bans artificial turf

Council votes unanimously to prohibit synthetic grass and enact maintenance requirements for current installations

By Alyse DiNapoli
DAILY JOURNAL STAFF

Millbrae City Council passed an ordinance that bans the installment of artificial turf and synthetic grass and mandates proper maintenance of existing turf if it was installed legally.



Andy Mogensen



Anders Fung

The prohibition is a more permanent continuation of the moratorium enacted by the city in 2021 that paused all new synthetic turf installations after negative environmental impacts began to surface.

"We're concerned about the health and safety of synthetic materials. There's plastics, nylon, different kinds of materials in there," said Community Development Director Andy Mogensen. "And we are concerned with its impact on our stormwater, aquatic life and things of that nature," he said.

During the staff presentation to the council Tuesday, Oct. 24, Mogensen also explained the draft ordinance would require residents to replace turf currently in place by Jan. 1, 2028. But several councilmembers, such as Angelina Cahalan and Anders Fung expressed concern that a fixed time limit would place undue burden on

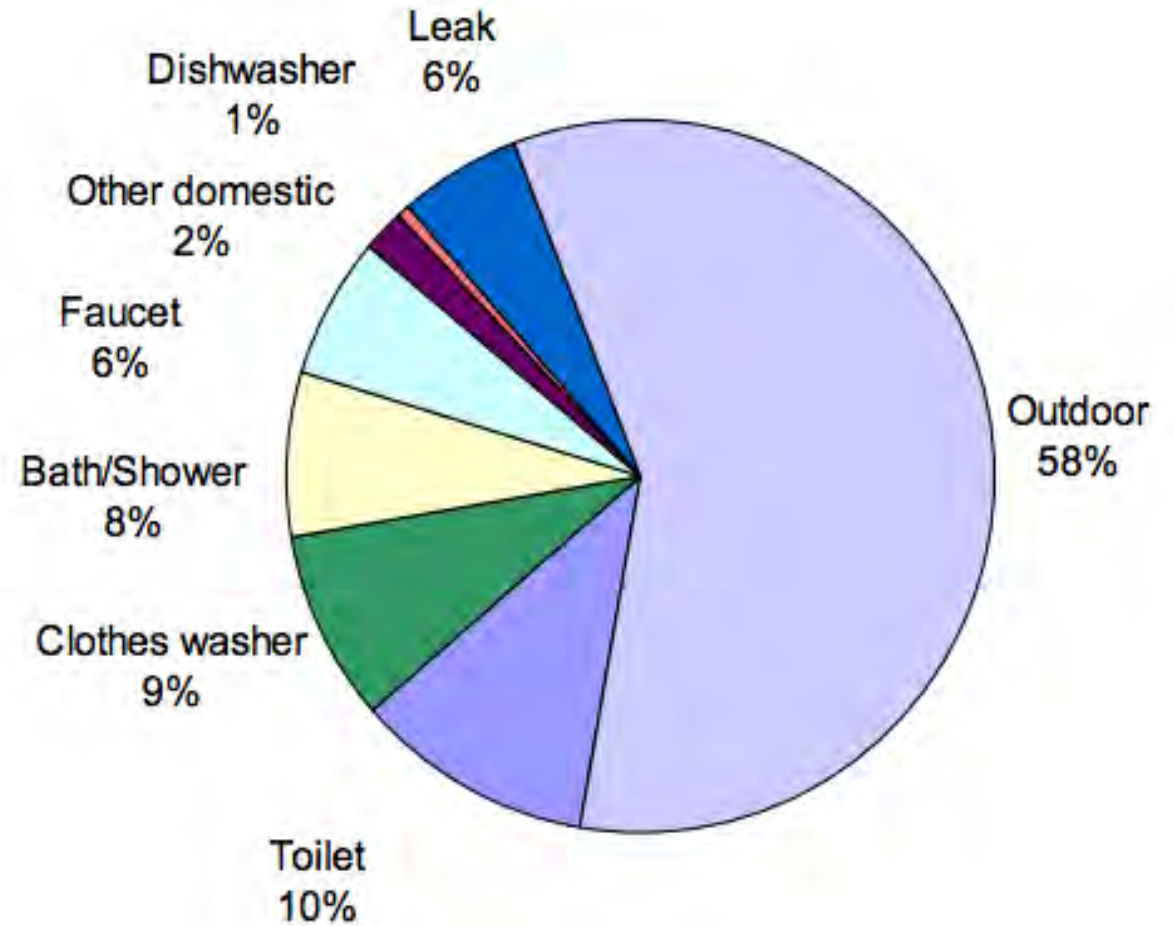
See TURF, Page 17

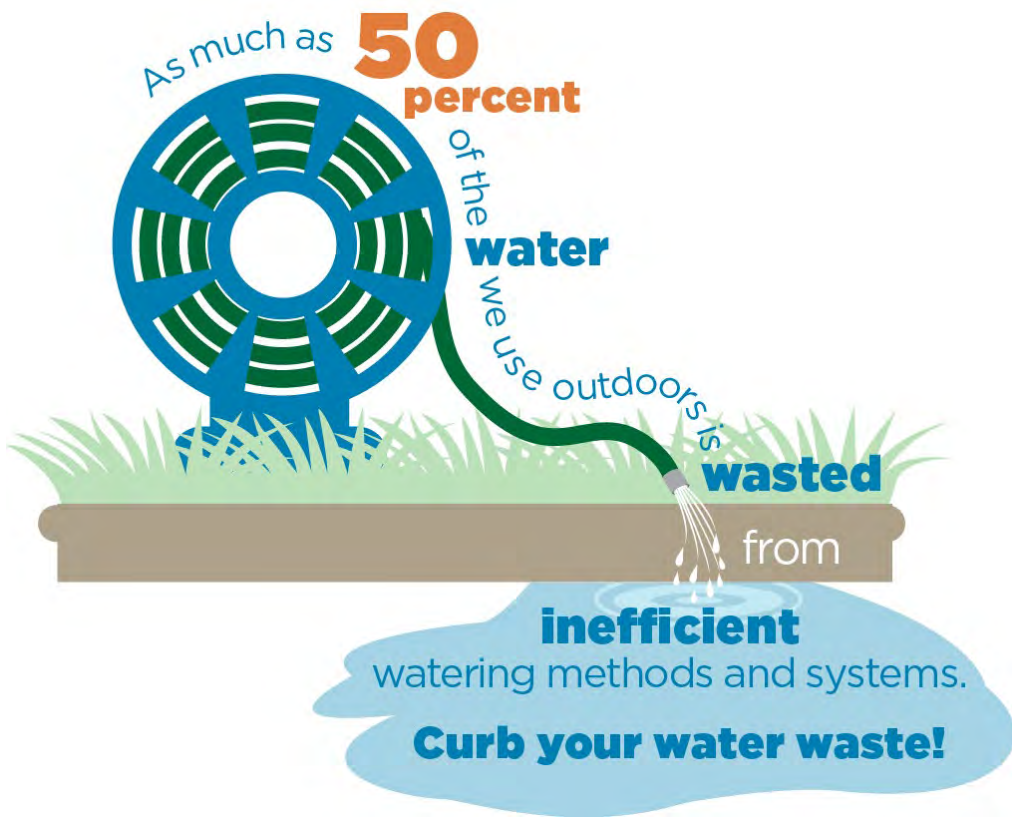


Environmental Factors



Water Use





Water

- Reduce water use 30-60%
- Reduce water waste (~50%)



Water Quality and Runoff

- Microplastics can leach into groundwater and soil
- Runoff is faster with no permeable surfaces

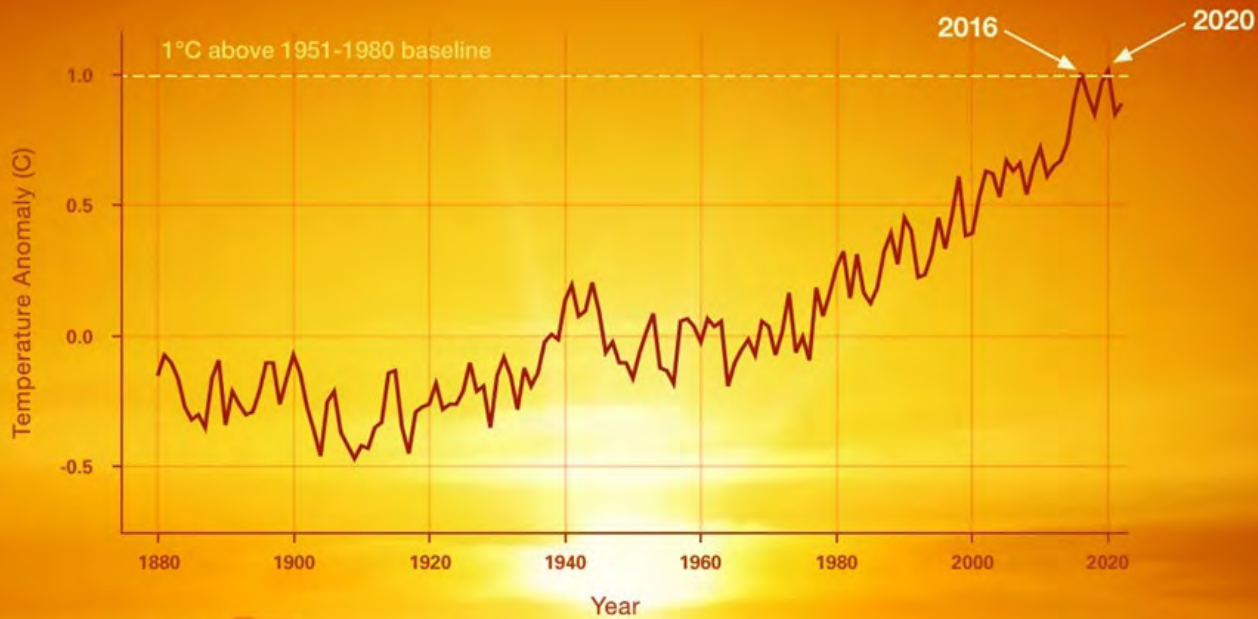
Soil Quality

- Inhibits soil bacteria, affects soil quality
- Dries out soil
- Affects health of adjacent landscaping



Heat Effects

- Artificial turf heats up faster than asphalt
- Artificial turf stays hot longer than natural surfaces
- Surfaces can reach 175° (when air temps are 100°)



Health and Safety

- Nylon or plastic and crumb rubber made from used tires, plastic pellets or sand
- PFAS (aka “forever chemicals”)
- Human health risks



Why do people install artificial turf?

**SAVING WATER / CHEAP /
LOW MAINTENANCE**

Why do people install artificial turf?

SAVING WATER / CHEAP / LOW MAINTENANCE

IS IT?

Cheap?

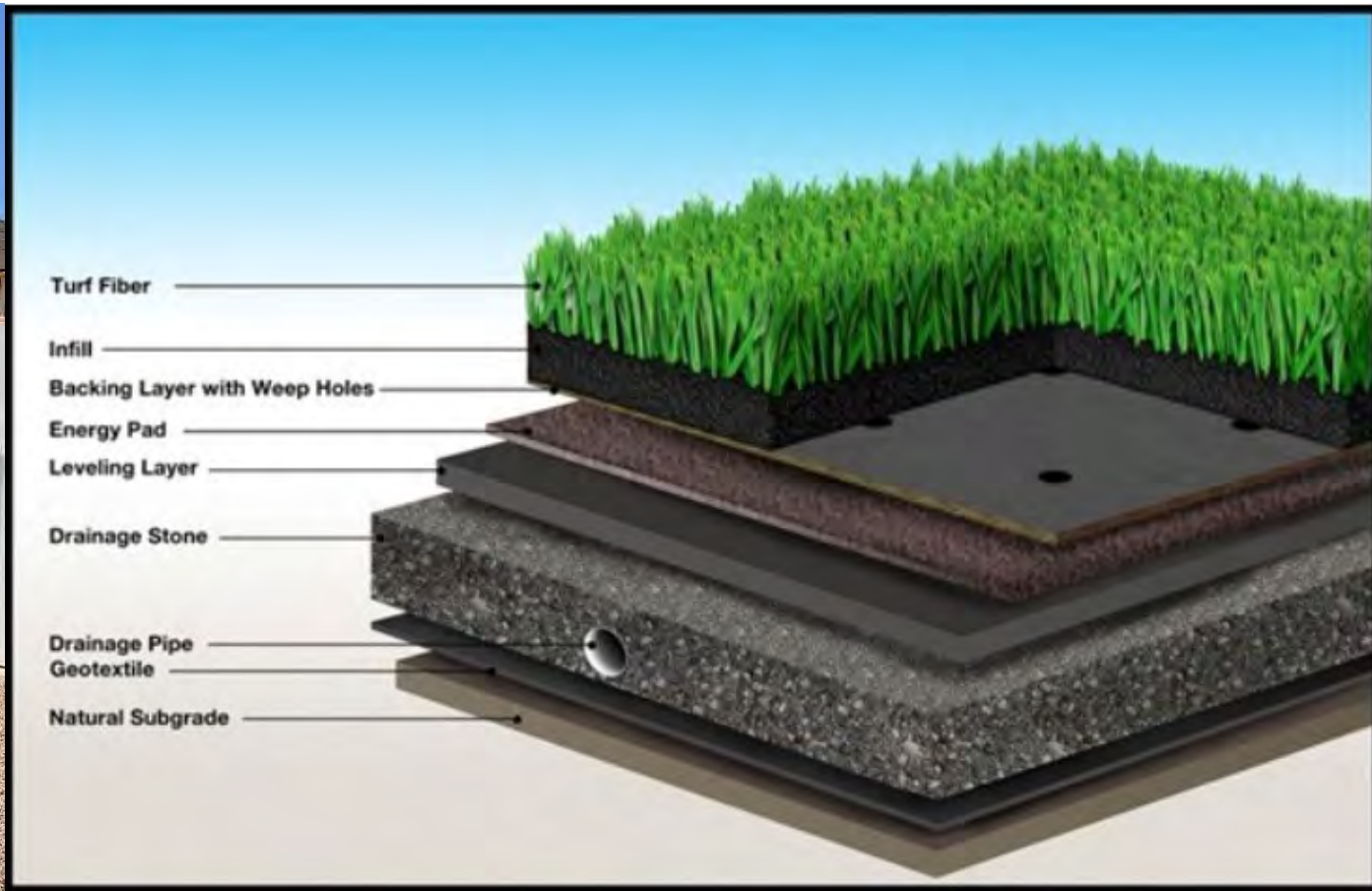


This is cheap

Cheap?



This is cheap



This is not!

This might be cheaper



Cost of sod + drip irrigation + lawn mowing

Water Saving

- In 2021, Governor Gavin Newsom declared a drought emergency in the State of California, requesting a voluntary 15 percent water usage reduction for counties from their 2020 levels.
- Cities introduces emergency measures restricting sprinkler irrigation to 1-2 days a week.
- Lawns started drying.



THE CITY OF SAN FERNANDO
KNOW YOUR WATERING DAYS

Beginning October 16, 2022, watering lawns will be limited to **ONE DAY EACH WEEK**

Between 5 pm and 10 am No more than 10 minutes per station

	MON	TUE	WED	THU	FRI	SAT	SUN
ODD Addresses	Watering						
EVEN Addresses		Watering					
	LUN	MAR	MIE	JUV	VIE	SAB	DOM

Directrices IMPARES
Directrices PARES



Residents got creative

**NO GRASS -
NO PROBLEM**



Residents got creative



You still need to use water...



to rinse

You still need to use water...



to wash

You still need to use water...



and to cool

Additional long-term costs



Tree replacement

Additional long-term costs



Habitat restoration

Additional long-term costs



Hauling & recycling (?)

Crafting an Effective Ordinance

- **Definitions**
- **Coverage / Placement**
- **Materials**
 - ✓ **Durability**
 - ✓ **Infill Material / Base Material**
 - ✓ **Density of Material**
 - ✓ **Color**
 - ✓ **Warranty**
- **Installation**
- **Maintenance**



Coverage & Placement

- Consider a maximum percentage of lot coverage
- Identify locations where coverage is prohibited
 - Leave room for stormwater absorption
 - Parkways and medians can be problematic
 - Avoid adjacent high foot traffic areas
 - Consider prohibiting placement within the *dripline of a tree (*the outer circumference of a tree's canopy)
- Consider also limiting the total hardscape



Coverage / Placement



Think about runoff capture and stormwater percolation

Must be permeable!

Prohibit installation on hardscape & non-permeable surfaces

Setbacks with natural landscaping and bioswales help limit material loss and runoff onto streets and neighbor's properties.

Material Composition



What are the blades made from?



Non-allergenic, non-toxic, flame resistant



Prohibit Polyfluoroalkyl Substances (PFAS)



Should have a percolation rate of at least 20 inches per hour



Material Composition

- **Infill / base material should be clean silica sand, zeolite or 100% organic material**
- **Petroleum-free backing and infill mix**
- **Prohibit crumb rubber & recycled tires**
- **Prohibit the use of plastic sheeting and impermeable weed barriers – they prevent percolation and dry out the underlying soil**



Material Durability

- ✓ **Tear strength of at least 200 lbs.**

Tear strength is the measurement of force necessary to tear when pulled laterally.

- ✓ **Triple layer primary backing with a tuft bind strength minimum of 10 lbs.**

Tuft bind strength is the measurement of force needed to pull turf blades from backing.

- ✓ **Minimum 8-year warranty guarantee, resistance to staining, weather, insects, rot, mildew and fungus growth.**



Material Density

- Consider the pile height – short or long?
- Pile height between 1¾” and 2½” is appropriate for a front yard
- Short piles like putting greens are best placed in the rear yard
- Blade density & variety makes a noticeable difference





Material Color

- Consider the color – *yes, people do that*
- Noticeable when different products are used adjacent to one another

Installation

- ✓ Placed on a level surface – taught and flush with subgrade
- ✓ Don't install on a slope or hill - maximum slope of 5% to 10%
- ✓ Consider requiring a solid barrier or bender board between synthetic turf and live plant material or soil
- ✓ Require removal of pre-existing irrigation
- ✓ Seams must be firm, tight and anchored with the grain pointing in a single direction
- ✓ Seams can't be visible.



Maintenance

- **Maintained in an attractive and clean condition (define what that is)**
- **Must not contain holes, tears, stains, discoloration, seam separations, lifted surfaces, buckling, heat degradation, or excessive wear**
- **Damaged or worn areas must be repaired or removed and replaced**
- **Weed and litter-free**
- **Don't allow vehicle parking**
- **How busy are your Code Enforcement staff??**



What do other cities do?

City of Carson regulates height of piles and method of installation to provide sufficient drainage.

City of Cerritos provides guidelines to residents and requests an eight (8) year warranty for artificial turf.

City of Cypress provides standards pertaining to the quality/character of the materials and requests a warranty.

City of Glendale allows to calculate artificial turf toward the total lot area requirement for landscaping, but does not allow to calculate it toward the live plant material requirement.

City of Long Beach used to have a citywide moratorium for artificial turf. Since 2019, non-permeable paving and non-permeable artificial turf cannot cover more than thirty percent (30%) of open on-site area.

City of Norwalk limits the permitted area of artificial turf by 70% of the landscape area; balance of the landscape area shall contain live, natural plant materials. The City regulates height of piles and color of artificial turf (a minimum of two shades of green), and requests permeable sub-base.

Cities of Millbrae, San Marino, and San Fernando banned artificial turf.



Are you looking to replace your front lawn or use artificial turf?



BE AWARE:

Artificial turf and synthetic grass is temporarily prohibited in San Fernando

City Code requires 50% of your front yard to have living plants

The City is exploring modification to front yard landscape standards

Your landscape project may qualify for a Turf Replacement Program offered by MWD*

Before starting your landscape project...

Contact the Community Development Department to learn about permit requirements, *sign-up for FREE turf replacement workshops, and get recommendations for creating a beautiful climate-appropriate landscape.

For more information:

SFCITY.ORG/Community-Development/#Lawn-Replacement

CommunityDevelopment@sfcity.org | (818) 898-1227 |



Let people know it's banned

Water-bill inserts are a good option

Educate



Residential Turf Replacement Program

About the Program

This program rewards landscape designs that incorporate water-saving plants, technology, irrigation systems and hardware. Replace your lawn with a beautiful California Friendly® and native landscape that helps you save a significant amount of water and provides a home for birds, butterflies and beneficial pollinators. Rebates start at \$2 per square foot and may be more depending on additional local water agency incentives.

Eligibility

- A maximum of 5,000 square feet of turf removed per home is eligible for funding each fiscal year.
- The project must have a minimum of 250 square feet of turf removed in the front yard, or if the entire front yard is less than 250 square feet, all turf must be removed.
- There is a limit of one application per home per year.
- Areas which have already had turf removed are not eligible.
- Eligible areas for transformation include front yards and back yards.

Program Requirements

Turf replacement projects must include:

Three California Friendly® and native plants per 100 square feet of lawn transformed.

A stormwater retention feature to help keep water in your yard when it rains. Rock gardens and rain barrels are among several sustainable landscaping approaches you can take.

Permeable hardscapes that allow water to flow through the surface and slowly filter into the ground.

A replacement or modification of overhead spray sprinklers to a more water efficient irrigation system.



FREE TURF REPLACEMENT & TREE PLANTING REBATE WORKSHOP!

LEARN ABOUT:

- ✓ Application process
- ✓ Sustainable and water-wise landscaping
- ✓ Other efficient irrigation and device rebates
- ✓ \$100 rebate for planting a tree
- ✓ Risks of using artificial turf

Bring Your Questions!



PRESENTED BY

THE METROPOLITAN
WATER DISTRICT
OF SOUTHERN
CALIFORNIA



SCAN ME!

WHEN & WHERE

🕒 July 18, 2024 at 6:30 pm

📍 City Hall - Council Chambers
117 Macneil Street
San Fernando, CA 91340

CONTACT US

Marina Khrustaleva, Associate Planner

📞 (818) 898-1378

✉️ CommunityDevelopment@fcity.org



bewaterwise.com



Provide alternatives

Natural ground covers



Kurapia



Succulents



Angelina sedum

Provide alternatives

Drought-tolerant landscapes



Thank You!

Andrew Mogensen, AICP - Community Development Director, City of Millbrae

Darcy Kremin, AICP - Senior Principal Planner, ESA

Marina Khrustaleva - Associate Planner, City of San Fernando

From: [Mary Brunkhorst](#)
To: [PlanningCommission AP](#)
Subject: Ban Artificial Turf in City Parks
Date: Thursday, June 18, 2026 10:45:38 PM

WARNING - This email came from an EXTERNAL source. Confirm the sender and its contents are safe before responding, opening attachment or links.

Planning Commissioners,

The Sunnyvale Urban Forest Advocates urges you to ban artificial turf in city parks.

Natural grass provides many benefits to the parks, including ensuring the health of the urban forest. Trees that line fields and walkways provide shade, make a park a pleasant place to visit, and must be protected. When natural grass is watered, the trees and surrounding landscaping also receive that water. Installation of artificial turf will result in less water reaching the trees. The heat reflected off the artificial turf also stresses the trees. If the trees suffer, the quality of the park will be impacted.

It is critical that the health of the entire park and community be considered when changes are made to a park. Natural grass helps regulate the temperature, improves stormwater management, and provides habitat for numerous beneficial insects that maintain the health of the soil and are food for other birds and animals. Natural grass and trees provide a great service to the environment and community.

Preserve natural grass and ban artificial turf in parks.

Thank you,
Mary Brunkhorst
Sunnyvale Urban Forest Advocates

From: [Mary Brunkhorst](#)
To: [PlanningCommission AP](#)
Subject: Ban Artificial Turf in Public Spaces
Date: Thursday, June 18, 2026 10:45:40 PM

WARNING - This email came from an EXTERNAL source. Confirm the sender and its contents are safe before responding, opening attachment or links.

Planning Commissioners,

I urge you to ban artificial turf in public spaces and parks throughout the city.

Community Feedback:

During both the Lakewood Park and Las Palmas Park renovation processes, the community has made clear that it prefers open, general use fields that are available for all to use. Adding artificial turf to parks will limit the use of those spaces, effectively shrinking the public space.

Groups Served:

The artificial turf in parks typically serves only one small segment of the population and is fenced off from other users.

Usage Hours:

While artificial turf fields may be playable in the rainy winter, they will be too hot to use in the summer. Artificial turf manufacturer's instructions detail the temperatures at which the fields should be closed and these guidelines should be followed for safety. Natural grass fields are usable in all temperatures. Natural grass fields may be closed in winter and artificial turf fields may be closed in summer. The expected increase in play time for artificial turf will not be as large as predicted, thus making that calculation erroneous. The fields are used by more people and camps during the summer months and must be open and available to all during this time.

Water Usage:

Artificial turf requires a lot of water to maintain. The fields should be watered regularly to preserve the infill and it should be washed regularly to clean the field of contaminants. Water is also needed to cool the fields. Any significant reduction in water use will harm nearby trees and plants.

Natural Grass Benefits:

The health and safety of the community members and environment should be a priority. Natural grass helps regulate the temperature, improves stormwater management, and provides habitat for numerous beneficial insects that maintain the health of the soil and are food for other birds and animals. Natural grass is also sustainable.

Climate Action Plan:

Natural grass meets the goals of the climate action plan by providing a natural, sustainable surface that sequesters carbon. Natural grass also supports the urban forest, another goal of the climate action plan.

Conclusion:

Decisions should not be based only on costs or convenience, but on how to serve the greatest

number of residents and their varied interests. Public spaces that are available for multiple uses are a vital part of the community. There is no place for artificial turf in our city parks. Improved care of natural grass fields will benefit the community far more than the use of artificial turf.

Ban artificial turf in city parks and public spaces.

Thank you,
Mary Brunkhorst