

From: [Kristen Mello WRAFT](#)
To: [Carol Ann Desiderio](#)
Cc: [Friends of Roosevelt Park](#)
Subject: Re Roosevelt Park remediation and renovation
Date: Tuesday, March 28, 2023 5:15:29 PM

Dear Madam City Clerk,
Would you please be so kind as to forward this email with the entire City Council?
Thank you very much, in advance.
Sincerely,
Kristen Mello

Dear Honorable City of Malden City Council Members,

I have been asked to share the following information with you regarding the Lead remediation and field renovation at Roosevelt Park.

First, after your Board of Health meeting, I am relieved to see the City moving forward with soil excavation, removal, and clean fill replacement in this overburdened Environmental Justice Community. Thank you for taking this very necessary step.

Second, I caution you to think carefully about your choice of field materials in the Roosevelt Park renovation project. There are many good reasons to choose natural grass playing fields, among them being: oxygen production, carbon sequestration, stormwater absorption and transpiration, temperature reduction (artificial playing fields are heat islands), player injury, and hazardous materials and chemicals leaching from field system components. (full references available upon request)

However... There is another very important reason to reconsider your options and choose a natural grass field. **Artificial Turf is Impervious Surface according to the EPA** and the City of Malden has an ordinance that requires that open space not be impervious.

"All openspace shall be pervious, visible to the public and a minimum of 50% shall be located in yard setback areas, where setbacks are required."

From: https://malden.municipalcodeonline.com/book?type=ordinances#name=12.16.080_USABLE_OPEN_SPACE_REQUIREMENTS_FOR_ALL_DISTRICTS

Looking at EPA's General Permit for Stormwater Discharges From Small Municipal Separate Storm Sewer Systems (MS4 Permit) (<https://www.epa.gov/npdes-permits/massachusetts-small-ms4-general-permit>)

In its Appendix A is the definition for Impervious Surface, on page 2 of 8 states:

"Impervious Surface- Any surface that prevents or significantly impedes the infiltration of water into the underlying soil. This can include but is not limited to: roads, driveways, parking areas and other areas created using non porous material; buildings, rooftops, structures, **artificial turf** and compacted gravel or soil."

From: <https://www3.epa.gov/region1/npdes/stormwater/ma/2016fpd/appendix-a-2016-ma-sms4-gp-mod.pdf>

Further, according to PennStateExtension

- One inch of rainfall on an acre of impervious surfaces produces 27,000 gallons of stormwater to manage.
- Stormwater runoff from 1 acre of impervious surface = runoff from 20 acres of grassland

This could become a problem with climate change increasing storm severity and sea-level rise, because impervious surfaces generate a LOT more stormwater to manage.

Please do your best to provide the safest, most natural environment for the growing children and families of this overburdened community. Soil and grassland are vital, dynamic, living ecosystems, please do not force this EJ community to give that up for toxic, synthetic, contamination-leaching materials for their children to play on.

Thank you for considering these comments as you deliberate the items before you tonight. Please feel free to reach out to me with any questions.

Very sincerely yours,

Kristen Mello

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