

## Rub Some Dirt on It...or Rubber?

For San Francisco 49er football fans across the country, and football fans in general, nothing is harder to stomach than seeing a player's season get cut short due to injury. Injuries hurt the team, hurt the sport, hurt the viewing experience and literal hurt the player. The two most common locations for a football injury to occur are the knee and ankle.<sup>1</sup> Of these injuries, the most infamous is when an NFL player tears their anterior cruciate ligament (ACL), which is a ligament located within the knee. Once torn, an ACL requires surgery and carries an eight-to-nine-month recovery timetable.<sup>2</sup> With the NFL season lasting only six months (seven with pre-season), an ACL tear is considered season ending.

Unfortunately, such a devastating injury is all too common of an occurrence, with ESPN even creating an "ACL Club" where they report the yearly ACL tears.<sup>3</sup> In 2021, the NFL's Health and Safety data reported 71 ACL injuries, an increase in 20 from the previous season. To put those numbers in perspective, an entire NFL team only consists of 53 players. So almost one and a half teams worth of players were lost solely to ACL tears in 2021. Players, coaches, general managers, and fans are all looking for ways to lessen the occurrence of this ominous ACL specter which continuously haunts the league.

One place to look, which has recently re-picked up steam, is in the makeup of the playing field itself. There are two types of NFL playing surfaces: those consisting of real grass and those consisting of artificial turf.<sup>4</sup> In 2010, New England Patriots Coach Bill Belichick blamed horrible turf for knocking star wide receiver Wes Welker out for the season with an ACL tear.<sup>5</sup> In 2011, NFL punter Brett Hartmann's foot got caught on the playing turf causing him to tear his ACL. At the time, these injuries led the NFL's Injury and Safety Panel to analyze the past "2002-08 NFL seasons, comparing games played on grass to those on FieldTurf."<sup>6</sup> The report found that ACL injuries were 88 percent higher on turf than real grass.<sup>7</sup>

Despite the report, the NFL implemented no rule addressing the type of playing surface teams must use in their stadiums.<sup>8</sup> Instead, the decision to use real grass or turf is left up to the owner of each stadium. This lack of action left a controversy brewing in the wings. A controversy, which due to the recent uptick in ACL injuries highlighted earlier, has once again boiled over. 49ers general manager John Lynch, in 2020, said, "the 49ers would be very happy if they never saw another artificial turf field this season. Or ever, for that matter."<sup>9</sup> A response to losing two star players, Nick Bosa and Solomon Thomas, to ACL injuries while playing on a turf field. Two years later, the NFL Players Association President J.C. Tretter released a statement calling for the ban and replacement of turf fields in a number of stadiums, citing "statistically

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<sup>1</sup> <https://www.sportskeeda.com/nfl/what-common-nfl-injury>; <https://nflps.org/faqs/what-are-the-most-common-injuries-and-medical-problems-among-football-players/>.

<sup>2</sup> <https://www.uchealth.org/today/acl-tears-how-long-does-it-take-to-recover-and-return-to-sports/>.

<sup>3</sup> [https://www.espn.com/fantasy/football/story/\\_id/34267692/fantasy-football-injury-outlook-2022-acl-club-christian-mccaffrey-michael-thomas-more](https://www.espn.com/fantasy/football/story/_id/34267692/fantasy-football-injury-outlook-2022-acl-club-christian-mccaffrey-michael-thomas-more).

<sup>4</sup> <https://www.nbcsports.com/washington/football-team/which-nfl-stadiums-have-artificial-turf-vs-real-grass>.

<sup>5</sup> Jennifer Simile, *Intentional Grounding: Field Quality in the NFL and the Legal Ramifications for Choice of Playing Surfaces*, 47 J. Marshall L. Rev. 115, 115-17 (2014).

<sup>6</sup> <https://www.espn.com/nfl/news/story?id=4988136>.

<sup>7</sup> *Id.*

<sup>8</sup> *Supra* note 4.

<sup>9</sup> <https://www.nbcsports.com/bayarea/49ers/49ers-gm-john-lynch-hopes-nfl-switches-all-grass-fields-someday>.

higher in-game injury rates.”<sup>10</sup> A sentiment supported by Super Bowl winning tight end Travis Kelsey who on a podcast stated, “I know it's magnified by 10 whenever I play on turf. Every single step in the fourth quarter you feel in the knees and in the joints and in the ankles – at least this is just for me. I hate playing on turf.”<sup>11</sup>

The counterargument is that turf provides a consistent year-round surface and unlike the turf fields studied from 2002-2008, doctors say that turf fields have drastically improved over the past fifteen years.<sup>12</sup> Grass can be grown in stadiums located in the southern half of the country, but, in northern stadiums, grass dies in the winter. Playing on painted dead grass can result in serious injuries whereas artificial turf, with rubber pellets for cushioning, is easier on a player's body.<sup>13</sup> In further support of this argument, the Tennessee Titans who are building a new stadium examined injury statistics from the 2018-2021 seasons and determined that turf fields resulted in the “best and safest” playing condition for players.<sup>14</sup> Relying on this data, the Titans have decided to switch from a grass field to a turf field in their new stadium. All injury talk aside, it also cannot be ignored that turf fields are cheaper to maintain, not needing any fertilizer or thousands of gallons of water.<sup>15</sup>

This playing surface debate shows no sign of slowing down, but maybe the solution lies with what some term “real” football. European soccer stadiums implement hybrid fields, combining real and artificial grass.<sup>16</sup> The mixture allows soccer fields to remain “in great condition throughout the year.” For now, however, the debate appears to remain a binary choice.

-- Ryan Elson

Blog Post Summary: In the NFL there has been a recent uptick in the debate regarding playing surfaces in stadiums. The grass versus turf discussion is alive and well with the Tennessee Titans most recently deciding to switch from a grass to a turf field.

Personal Summary: Ryan Elson is a current 2L law student from San Francisco, California. He is still salty over the Eagles beating his 49ers, thank you Chiefs...although I'm still salty over losing to the Chiefs as well.

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<sup>10</sup> <https://nflpa.com/posts/nfl-player-health-safety-lies-beneath-the-surface>.

<sup>11</sup> <https://www.foxnews.com/sports/nflpa-calls-immediate-replacement-ban-slit-firm-turf-fields>.

<sup>12</sup> *Id.*; <https://titanswire.usatoday.com/2023/01/31/titans-switching-to-turf-at-nissan-stadium-in-2023/>.

<sup>13</sup> <https://www.sportsrec.com/6582480/why-turf-is-better-than-grass-in-football>

<sup>14</sup> Titans, *supra* note 12.

<sup>15</sup> <https://www.sportsrec.com/6582480/why-turf-is-better-than-grass-in-football>.

<sup>16</sup> <https://sqaf.club/premier-league-real-grass-hybrid-pitches/>.