



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF THE DIRECTOR
235 Promenade Street, Room 425
Providence, Rhode Island 02908

February 27, 2025

The Honorable David A. Bennett
Chairman
House Committee on Environment and Natural Resources
82 Smith Street
Providence, Rhode Island 02903

RE: H 5340 An Act Relating to State Affairs and Government – Department of Environmental Management

Dear Chairman Bennett,

Thank you for providing the Department of Environmental Management (DEM) the opportunity to comment on H 5340, which would require DEM to administer a chain of custody requirement for artificial turf installed on sports and playing fields. DEM shares the sponsor's concerns regarding plastic pollution, but we do not believe that this legislation is necessary to ensure the proper disposal of artificial turf.

H 5340 would direct DEM to establish a system to track the chain of custody of artificial turf installed on sports and playing fields. DEM would be required to serve as the repository for chain of custody information submitted pursuant to the law, maintain this information permanently, and develop a publicly accessible website making this information available. At present, disposal of artificial turf at a location other than a licensed solid waste facility would be a violation of Rhode Island's solid waste law and subject to penalties as described in R.I. Gen. Laws § 23-18.9-10. Although we are aware of instances in other states where artificial turf has not been properly disposed, we have not encountered any such instances in Rhode Island to date.

We appreciate the opportunity to offer comments on this legislation and would be pleased to make ourselves available as needed. Please feel free to contact Ryan Mulcahey, DEM Director of Legislative Affairs, at ryan.mulcahey@dem.ri.gov should you have any additional questions or wish to discuss this matter further.

Sincerely,

Terrence Gray, P.E.
Director

CC: Members of the House Committee on Environment and Natural Resources
The Honorable Jennifer Boylan
Nicole McCarty, Chief Legal Counsel to the Speaker of the House
Lynne Urbani, House Policy Director