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February 25, 2026

**Written Testimony of Bryan Jacob**

Vice President of Sustainability,  
Watershed Geo

In Opposition to H.7736

Rhode Island House Committee on Environment and Natural Resources

Thank you for the opportunity to submit testimony. My name is Bryan Jacob, and I serve as Vice President of Sustainability at Watershed Geo, a company specializing in innovative environmental solutions for infrastructure challenges, including landfill closures. I am writing in strong opposition to House Bill 7736, which threatens to ban one of our core technologies — ClosureTurf® Final Cover System — in the State of Rhode Island.

ClosureTurf is a three-component engineered turf capping system designed for use in lieu of conventional vegetative landfill covers. It meets EPA Subtitle D performance criteria as an alternative closure system and has been selected by four different landfill sites in Rhode Island<sup>1</sup>, including:

- Cranston (22 acres, 2015)
- Coventry (18.5 acres, 2019)
- Tiverton (33 acres, 2022)
- as well as 18 acres of Central Landfill in Johnston (2017).

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<sup>1</sup> Other noteworthy ClosureTurf projects in New England include the Southbridge landfill in Massachusetts along with several ash landfills for Covanta Energy; as well as the Materials Innovation and Recycling Authority (MIRA) site in Hartford, Connecticut which also has solar on top. More than 100 projects representing over 5,000 acres of ClosureTurf have been installed across the United States.

Two of these sites—Cranston and Coventry—have also installed solar photovoltaic arrays atop ClosureTurf, demonstrating its compatibility with renewable energy development. Cranston added solar ([3.43 MW](#)) in 2021, and Coventry’s solar installation ([5.4 MW](#)) went live just last month.

While I cannot speak on behalf of landfill operators, common reasons they choose ClosureTurf include the need to permanently address slope instability, erosion, and sedimentation/runoff issues. Cost is also a significant factor. Each design is unique, but ClosureTurf reduces annual maintenance costs by approximately 90% throughout the 30-year post-closure period and typically offers a total life-cycle cost savings of around 15% compared to conventional vegetative closures.

From an environmental standpoint, ClosureTurf delivers substantial benefits:

- 65–75% lower greenhouse gas emissions than conventional closure systems
- 97% improvement in runoff water quality (turbidity)
- Elimination of approximately 260 truckloads of soil per acre -- reducing traffic, noise, emissions, and safety risks

Customers often ask questions about microplastics as well as per- and poly-fluoroalkyl substances (PFAS). Although not directly referenced in H.7736, allow me to address both of those topics.

ClosureTurf fibers are manufactured with proprietary UV inhibitor additives and are specified to be installed using mineral aggregate infills (e.g. coarse, angular, crushed aggregate), avoiding the use of polymeric infill materials. ClosureTurf applications are generally passive and installed in locations with minimal to no mechanical abrasion (i.e., foot or vehicle traffic) which minimizes the release of microplastics throughout the product’s service life.

The manufacturer of the turf component of our ClosureTurf product has a Chemicals Policy that prohibits the use of PFAS to make the raw materials used in their products. They have confirmed through supplier disclosures and periodic third-party analytical testing that no PFAS are used to make the turf product used in ClosureTurf, including manufacturing processing aids.

An additional advantage of ClosureTurf is that it can extend the operational life of landfills. Conventional vegetative caps require two feet of soil, which counts against the permitted elevation. ClosureTurf’s thinner profile allows that volume to be used for additional waste

disposal. At Central Landfill, for example, this could translate to a meaningful extension of service life.

I urge the Committee not to remove this decision from the hands of landfill operators who are best positioned to evaluate site-specific needs. ClosureTurf is a proven, sustainable technology that supports both environmental protection and economic efficiency.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Bryan Jacob", with a long, sweeping horizontal flourish extending to the right.

Bryan Jacob  
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