



February 25, 2026

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

RE: H. 7736 – Relating to Health and Safety – Rhode Island Resource Recovery Corporation (RIRRC)

Dear Chairman Bennett,

I write regarding House Bill 7736 and respectfully ask that the House Environment and Natural Resources Committee consider the following three concerns as it evaluates the legislation.

First, one of the biggest benefits of using artificial turf over natural vegetative covers is that it increases the amount of disposal capacity available in the area to be covered by reducing the amount of soil needed between the capping membrane and the final permitted landfill elevation. In the Central Landfill example, if RIRRC were to be prohibited from using artificial turf for all the remaining permitted sections of the landfill yet to be covered, the State would lose 429,000 tons of disposal capacity. To put this in perspective, this equates to more than a year's worth of disposal capacity for Rhode Island's 39 cities and towns. At the current municipal tipping rate of \$63/ton, this represents the loss of more than \$27,000,000.00 worth of disposal capacity. At the current non-subsidized commercial gate rate of \$115/ton, this equates to approximately \$49,000,000.00 in lost disposal capacity.

RIRRC's next concern relates to the proposed requirement that it undertake a "landfill plant cover pilot project program." In the corporation's opinion, this effort would be duplicative, as it is already well versed in establishing vegetative covers on the Central Landfill. In fact, the corporation has installed and currently maintains 113 acres of vegetative cover, and the last two areas capped in this manner were planted with wildflower and grass seed mixtures native to our region. Perhaps more importantly, however, please recognize that the pollinator benefits of any vegetated cover installed in capping the landfill are, and will continue to be, severely limited by the regular mowing that is required in these areas to ensure the safe operation, maintenance, and integrity of the landfill's impermeable cap, its stormwater controls, and its landfill gas extraction system.

Finally, accurately tracking the volume and weight of artificial turf brought to the landfill for disposal as proposed presents significant safety, efficiency, and cost concerns when dealing with turf that may be brought in co-mingled with other materials. In such instances, these "mixed loads" would first have to be tipped at the working face of the landfill. RIRRC staff and equipment would then be needed to sort out the turf from the remaining materials, load the turf into separate trucks, transport it back down to the Scalehouse for weighing, and then back up to the landfill again for final tipping and disposal. All of this additional activity would go well beyond standard practice, place staff in harm's way, hinder operational efficiency, and generate additional costs for what appears to be a relatively limited informational benefit.

Finally,

Thank you for considering these points in your continued deliberations.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lou Vergato". The signature is fluid and cursive, with a large initial "L" and a long, sweeping underline.

Lou Vergato
Executive Director

Cc: House Environment and Natural Resources Committee