



Via Electronic Mail

May 5, 2026

The Honorable Robert Britto
Chair, Senate Commerce Committee
Room 212, State House
Providence, RI 02903

Re: CLF **Supports with Conditions** Senate Bill No. 3224 – Prohibition On Thermal Waste Conversion Facilities at Quonset Point/Davisville Industrial Park

Dear Chair Britto:

The Conservation Law Foundation (“CLF”) appreciates the opportunity to comment on S-3224 that would prohibit the development of thermal waste conversion facilities at the Quonset Point/Davisville Industrial Park until January 31, 2027. For the following reasons, CLF supports S-3224 with the following conditions.

Founded in 1966, CLF is a member-supported non-profit advocacy organization working to protect public health and the environment and build healthy communities in Rhode Island and throughout New England. Through its Communities and Toxics Program, CLF aims to ensure that environmental justice communities in Rhode Island are meaningfully involved in the policy formation and decision-making process related to statewide solutions for the disposal of sewage sludge in Rhode Island.

On October 25, 2024, Rhode Island Commerce Corporation, acting by and through its agent and attorney in fact Quonset Development Corporation, and Global Soil Solutions, LLC entered into a Non-Binding LOI regarding a potential long-term ground lease of approximately 9.34 acres of land located along All American Way, North Kingstown, Rhode Island for the installation and operation of a biosolids biochar manufacturing facility (“QDC Thermal Waste Conversion Facility”).¹ It appears that S-3224 has been filed to ensure that further development of the QDC Thermal Waste Conversion Facility would not move forward until the proposed commission created by Senate Resolution 3225 - CREATING A SPECIAL JOINT LEGISLATIVE COMMISSION TO STUDY SLUDGE MANAGEMENT IN RHODE ISLAND – completes its

¹ Non-binding Letter of Intent dated October 25, 2024, between the Rhode Island Commerce Corporation, acting by and through its agent and attorney in fact, Quonset Development Corporation (“QDC”) and Global Soil Solutions, LLC (“GSS”) (the “Non-Binding LOI”); <https://quonset.com/wp-content/uploads/2026/04/QSS-Biosolids-Lease-Notice-4-23-26.pdf>.

work and the findings of this Commission are used to influence the decision of whether or not to proceed with the QDC Thermal Waste Conversion Facility.

With respect to S-3225, the wastewater industry is heavily represented on the Commission, including members from the Rhode Island Clean Water Association, the Narragansett Bay Commission (“NBC”), a representative of a treatment facility, Northeast Biosolids & Residuals Association, and a representative of a private company involved in biosolids management. However, CLF there are no representatives appointed to the Commission from environmental justice organizations representing environmental justice communities located adjacent to the Port of Providence (where NBC’s principal operation is located).

Without equal representation on the Commission, Rhode Island environmental justice communities in Rhode Island – particularly the environmental justice communities located adjacent to the Port of Providence – will, as repeatedly been the case, bear the cumulative burden from this lack of representation for the benefit of the remainder of the state. This is a result that the environmental justice communities will no longer tolerate. Accordingly, CLF supports S-3224 and emphasizes that S-3225 should be amended to include an environmental justice representative representing the environmental justice communities located adjacent to the Port of Providence as a full member of the Commission.

Thank you for your time and consideration of this testimony.

Respectfully submitted,



Richard Stang
Senior Attorney, Rhode Island
Conservation Law Foundation

cc: Members of the Senate Commerce Committee
Senator Bridget Valverde
Senator Alana M. DiMario
Senator Dawn Euer
Darrèll Brown, Vice President, Rhode Island, Conservation Law Foundation