



*Via Electronic Mail*

May 5, 2026

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

Re: CLF **Recommends Amending** Senate Bill No. 3225 – Special Joint Legislative  
Commission To Study Sludge Management In Rhode Island

Dear Chair Britto:

The Conservation Law Foundation (“CLF”) appreciates the opportunity to comment on S-3225 that would establish a nineteen (19) member Joint Legislative Commission to Study Sludge Management in Rhode Island. For the following reasons, CLF recommends amending S-3225.

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.

***All methods for disposing sewage sludge have detrimental environmental impacts.*** The key questions to ask center around what particular method will cause what particular environmental harm and who will bear the biggest burden associated with it. The Joint Commission proposed by S-3225 can be an excellent tool to holistically answer these questions, however, the Joint Commission needs to be representative of all Rhode Islanders that will be impacted by their conclusions. Additionally, the deliberations of, and hearings held by, the Joint Commission need to be open to the public, fully transparent, and allow for submission and recording of public comments.

There are four ways a state can dispose of its sewage sludge: (1) spreading it on open fields as a “soil amendment”; (2) dumping it at a landfill; (3) incinerating or processing it through some other form of thermal conversion/anaerobic digestion process such as pyrolysis (although this results in waste products that must be disposed of); or (4) shipping it to an out-of-state facility.

The calamitous folly of choosing options (1) and (2) have been well documented and Rhode Island should rule them out.<sup>1</sup> This leaves options (3) and (4) to contend with. Option (4) is expensive and shifts most of Rhode Island's sludge disposal burden to out-of-state communities, which will most likely be out-of-state environmental justice communities.

Concerning S-3225's proposal to study Option (3), S-3225 is fundamentally flawed. 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, there are no representatives of Port of Providence-adjacent communities, where NBC's principal operation is located, appointed to the Joint Commission.

Without equal representation on the Commission, environmental justice communities in Rhode Island – particularly those 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 Rhode Island's environmental justice communities will no longer tolerate. Accordingly, CLF emphasizes that S-3225 be amended to appoint 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

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<sup>1</sup> IeRM – Institute for Energy & Resource Management; <https://www.ie-rm.org/blog-classic-2-columns/>.