



March 19, 2024

Maryland General Assembly
Education, Energy and the Environment Committee
Senate Office Building
Annapolis, MD 21401

Written Testimony in opposition of: House Bill No. 457:

Submitted by:
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Synthetic Turf Council (STC)
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Dear Chair Feldman, Vice Chair Kagan and members of the Education, Energy and the Environment Committee:

My name is Melanie Taylor and on behalf of the Synthetic Turf Council (STC), I am writing in opposition to House Bill No. 457. While we greatly appreciated the opportunity to meet with the bill's sponsor to provide our perspective, we continue to have strong concerns about the bill's proposed language.

As a 501(c)6 trade association representing the synthetic turf industry, the STC office is headquartered in Harford County, Forest Hill, Maryland. Founded in 2002, the STC represents over 200 members and promotes industry excellence through voluntary guidelines, certifications, and other learning platforms. Our membership includes representatives from every stage of installing and maintaining a turf field, including builders, design professionals, civil engineers, testing labs, maintenance providers, manufacturers, suppliers, installation contractors, infill and shock pad suppliers and specialty service companies.

The STC has three primary concerns with House Bill 457:

1. **Definition of "custodian"** – As written, a custodian includes "a person that owns or is in control of synthetic turf in the state" or "any current or subsequent owner of a property on which there is existing synthetic turf". We recommend a clearer definition of custodian as

the owner of the turf system to help narrow the responsible parties so that when a new field is installed, only one party reports it one time.

2. **Threshold of 5,000 square feet minimum** – We believe sports fields average at 75,000 square feet and playfields 30,000 to 50,000 square feet. Anything below that would include residential, commercial and recreation applications, which are not defined in the bill and typically have a longer lifespan than sports fields. Moreover, the difference in size and functionality between field turf and residential/commercial synthetic turf means that the installers of the latter differ—and make up a completely different industry—from those of the former, which may lead to confusion in jurisdictions. As a result, many synthetic turf systems will be “orphaned” and left untracked by the government’s database.
3. **Amendment to disclose maintenance and replacement costs.** Maintenance costs can vary based on how and how often a synthetic turf field is used, making them hard to estimate. However, despite these costs being merely an estimate, STC members already provide this information to customers upon request.

The STC is committed to protecting the environment and currently provides the latest guidance and resources on the best ways to reuse and/or recycle each component of a synthetic turf field. We are happy to provide counsel on such bills that would further codify established industry guidelines that effectively encourage sustainability and proper end-of-life handling.

Thank you for your consideration.

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