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April 29, 2026

The Honorable V. Susan Sosnowski, Chair
Senate Committee on Senate Environment and Agriculture
State House
82 Smith St.
Providence, RI 02903

RE: S 2439 – An Act Relating to Health and Safety – Pesticide Control

Dear Chair Sosnowski:

Please accept this letter with concerns regarding S 2439, legislation which would prohibit the application of lawn-care pesticides and rodenticides on the grounds of any public or private preschool and any public or private school with students up to grade 12. The bill provides exceptions that would allow their use in an emergency or on the playing fields and playgrounds of the school, preschool, and childcare center in accordance with an integrated pest-management plan as developed by the Department of Environmental Management (DEM) and the Rhode Island Department of Health (RIDOH). RIDOH would be required to provide any public or private preschool and childcare center with an explanation and the requirements of the pesticide or rodenticide application and notification law. In addition, the bill would create two new task forces.

Although RIDOH applauds the intent of the proposed legislation, it would not be possible for RIDOH to engage in the actions outlined in the bill without adequate resources. S 2439 requires RIDOH to participate in the creation of two task forces and author two different legislative reports, both of which will require considerable staff time from RIDOH. Funding is also needed for the task force to develop and implement methods to promote public education and professional training about pesticides and rodenticides and to enforce regulations related to pesticide and rodenticide use in schools. Given the general timetable associated with the promulgation of regulations, which is designed by statute to ensure maximum public input, it is not likely that RIDOH will be able to promulgate the required regulations by January 1, 2027.

RIDOH does not believe that a task force to examine the health risks associated with PFAS in artificial turf athletic fields is necessary due to the ban on artificial turf containing intentionally added PFAS that will be in effect as of January 1, 2029 (Consumer Ban Act of 2024 - [law24344](#)). Please be informed that RIDOH's drinking water regulations prohibit pesticide or fertilizer application or storage within the protective radius (200 feet-400 feet) of a public water system well. See RIDOH regulations 216-RICR-50-05-1, Sections 1.4(B)(3), 1.4(C), 1.4(G), and 1.23.

Thank you for the opportunity to comment on the proposed legislation. RIDOH would be happy to work with the sponsor(s) and members of the Committee on amendments to further the aims of this bill.

Sincerely,

A handwritten signature in black ink that reads "Jerome M. Larkin" with a long, sweeping horizontal line extending to the right.

Jerome M. Larkin, MD
Director

CC: The Honorable Members of the Senate Committee on Senate Environment and
Agriculture
The Honorable Lammis J. Vargas
Kristen Silvia, Director of Legislation and Deputy Chief of Staff
Patricia Resende, Director of Senate Policy