



Rhode Island Forest Conservator's Organization, Inc.



May 6, 2019

RI Department of Environmental Management
Division of Fish and Wildlife
3 Fort Wetherill Road
Jamestown, RI 02835

Re: Hunting Regulations for the 2019-2020 and 2020 – 2021 Seasons

The RI Forest Conservator's Organization, Inc. (RIFCO) is a non-profit organization dedicated to the protection and wise use of RI's woodland resources. We are an association of woodland owners and other conservationists, and our main activities include education and advocacy.

It is well documented that the high population of deer and the resulting impacts to forest health is seriously diminishing the values our forests provide, along with related impacts to public health and safety. We are again providing the Division a Position Paper by the RI Chapter of the Society of American Foresters that outlines the serious forest health implications of the browse impacts on forest regeneration and native plant health.

In the interests of the long-term health and productivity of our woodlands and the values that they provide, including high value forest products, wildlife habitat, recreational amenities, and watershed protection, we provide the following comments with regard to the proposed hunting regulations for the 2019-2021 seasons, and beyond.

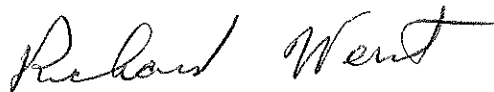
We encourage the Division to increase the take (Rule 9.7.1) and lengthen the season for all methods of hunting through January 31 of each year (Rule 9.7 C) in Zones 1 and 2. An extended firearms season would provide more opportunity to increase takes, especially if the extensions applied to antlerless deer, in an effort to reduce the overall deer population.

Increasing the take of antlerless deer in both Zones 1 and 2 will help reduce the deer population. The specific increase in number of antlerless deer allowed should be established by the RI DEM's professional wildlife resource managers that take into account the health of the forest, as recommended by the above-referenced position paper by the RI Chapter of SAF.

In addition to these specific recommendations to the applicable rules of the Hunting Regulations being promulgated by the RI DEM, Division of Fish and Wildlife, RIFCO supports the expansion of the Rules and Regulations Relating to Deer Damage managed by the RI DEM's Division of Agriculture to forest landowners attempting to regenerate their woodlands, and the implementation of a Deer Management Assistance Program (DMAP) that has been drafted by the DEM, Divisions of Forest Environment and Fish and Wildlife.

Thank you for this opportunity to provide testimony to the Rules and Regulations governing the 2019-2021 Hunting Seasons, and for the opportunity to stress to our state's wildlife biologists and managers the critical condition of the health of RI's forests, along with threats to public health and safety, and that these factors must receive greater influence in determining the hunting program's guidelines.

Respectfully,

A handwritten signature in cursive script that reads "Richard Went". The signature is written in black ink and is positioned below the word "Respectfully,".

Richard Went, President
RI Forest Conservator's Organization, Inc.

Forest Management and White-tailed Deer Herbivory in Rhode Island Forests

A Position Statement of the Rhode Island Chapter of the Society of American Foresters

Issue

White-tailed deer herbivory in many parts of Rhode Island is impacting the ecological function of forests by affecting tree regeneration possibly leading to: change in species composition; reduction of diversity in the shrub layer; negative impacts to forest ecosystem health and long term sustainable forest management for a wide range of wood products, wildlife habitat, and watershed protection values.

Position

The Rhode Island Chapter of the Society of American Foresters (RI SAF) recognizes that white-tailed deer are a valued and important component of Rhode Island's forests.

The long-term health of Rhode Island's forest is dependent on sufficient tree regeneration. These young trees are needed to quickly re-occupy the site when openings in the forest canopy are created through timber harvesting or natural disturbances. Deer herbivory at high population levels limits the amount of regeneration and is a serious problem in many parts of the state that, if not addressed, will continue to impact the forest ecosystem and the ability of the forest to regenerate itself.

RI SAF supports the State of Rhode Island Department of Environmental Management's (RI DEM) Division of Fish and Wildlife efforts of white-tailed deer management through recreational deer hunting.

RI SAF supports RI DEM Division of Forest Environment's (DFE) efforts to become more involved in deer management as it relates to forest health in Rhode Island. In order to maintain forest cover in the future, action needs to be taken now to better understand the status of tree regeneration in RI and the forces, including deer herbivory, that may be limiting it.

RI DEM, through its hunting regulations and targeted programs, should include forest health objectives when setting deer management goals and objectives for the state.

Background

Rhode Island's white-tailed deer population has followed the same path as much of the northeastern United States. For hundreds if not thousands of years predators, including man, kept deer populations and their impact on the environment in balance. As European settlers cleared land for farming, the amount of suitable habitat for deer decreased and over time deer

and the predators (not including man) that relied on deer also decreased. At its lowest point, in the late 1890s, only 25% of the state was forested and few deer remained in the state (Butler & Wharton). In the early 1900s as farms were abandoned they reverted back to forest without excessive deer herbivory so that in the 1960s, forest covered about 65% of RI. As the forests returned, deer increased as well so that in 1957 limited deer hunting was legalized in RI. However, the large predators such as cougar, wolf, bear, and coyote did not return to the state as deer did and some may never return. Deer are a prey species having evolved with predators; once females are 1½ years old they are able to produce offspring every year often times having twins. Deer have only become overabundant in RI over the last several decades. During this same time there has been a decrease in the number of people that hunt. The reason for hunting has also changed for many people, from hunting for meat where either a buck or doe was taken to more recreational hunting that focuses on taking large bucks.

Severe over-browsing alters plant species composition, distribution, and abundance, and reduces understory structural diversity (due to the inability of seedlings to grow beyond the reach of deer). These changes have a negative impact on other wildlife species, which also depend on healthy vegetative systems for food and cover (Northeast Deer Technical Committee).

There has been no statewide research in Rhode Island specifically looking at the impact that deer are having on forest productivity and health. There is no mention of white-tailed deer and their effects on the forest in *Rhode Island Forest Resources Assessment and Strategies "A Path to Tomorrow's Forests"* dated June 2010; *Forests of Rhode Island, 2014* dated July 2015; or *The Economic Importance of Rhode Island's Forest-Based Economy* dated 2015.

Deer are listed as a threat for many community types in the *2015 Rhode Island Wildlife Action Plan- Habitat Profiles, Threats and Actions by Community Type*. Actions to take include: Encourage the taking of more deer (special permits, etc.); allow hunters to take more; introduce more hunting capacity if existing hunter population is insufficient; get more people into hunting (women, etc.); and temporary regulations to reduce the population, followed by increased efforts to maintain a more healthy population level.

The Nature Conservancy's *Forest Regeneration in New York State* (2010) indicates that nearly one-third of New York's forest may not have sufficient regeneration to replace the forest in the future and list deer browsing as one of the factors playing a role in limited tree regeneration.

A study on the Scituate Reservoir has found that despite five years of deer hunting very little evidence of enhanced growth in the forest understory has been found. The contrast between the vegetation growing inside versus outside deer exclosures is becoming more dramatic. There appears to be some evidence that certain low-preference species, such as E. white pine

(*P. strobus*), Glossy buckthorn (*Frangula alnus*) and American beech (*F. grandifolia*), are achieving some modest height growth, which might be attributed to hunting. But these forests are still suffering from excessive browse damage. Most tree species are not able to successfully regenerate. Forest disintegration is occurring as canopy gaps become more frequent. The structure of the forest remains open and park-like in many places, with little undergrowth for birds that depend on such. Most wildflowers do not grow large enough to produce flowers. The overall prognosis for this forest is bleak unless the deer impact can be reduced further.

A study at University of Rhode Island's W. Alton Jones Campus involving two half-acre deer exclosures demonstrate the dramatic effect that an overpopulation of white-tailed deer is having on native plants and trees. Installed in 2011 by the Rhode Island Natural History Survey as part of its Forest Health Works Project, the deer exclosures clearly show how deer are reducing the density and diversity of native plants and exacerbating the expansion of invasive species.

Summary

Excessive white tailed deer herbivory in Rhode Island forests is impacting native tree regeneration and sustainable forest management. Other effects include reduced understory diversity that many other species of wildlife depend on and the expansion of non-native invasive plants. The effects on the forest can be reduced but a fuller and quicker recovery will only happen after the extent of the issue is documented so deer impacts can be reduced to levels that allow forest regeneration to meet quantitative standards for hardwood and mixed oak forests.

Literature Cited

Butler, B. and Wharton, E. editors, September 2003. *The Forests of Rhode Island*. United States Department of Agriculture, Forest Service, Northeast Research Station.

McLeish, T. (n.d.). Study at URI Alton Jones Campus finds abundant deer causing decline of native plants, expansion on invasives. Retrieved June 17, 2013.

Natural Resource Consultants, Inc., October 7, 2009. *Deer Management Plan for Providence Water Supply Board Scituate Reservoir Tunk Hill Study Area*.

Northeast Deer Technical Committee, March 2008. *An Evaluation of Deer Management Options*.

Rawinski, T., MacMillan, R., and Riely, C. March 30, 2015. *White-tailed deer Impact Monitoring at Scituate Reservoir, Rhode Island 2010-2014*. USDA Forest Service, Northeast Area State and Private Forestry, Durham, NH. Not published.

Shirer, R and Zimmerman, C. September 2010. *Forest Regeneration in New York State*. The Nature Conservancy, Eastern New York Chapter, Albany, NY.

Dear Fish & Wildlife Staff:

During the Hunting regulations portion of the hearing on May 6, 2019, Jack Peters spoke regarding Section 9.7.2 paragraph E.

I am very opposed to allowing more than one (1) weapon in the field at a time for hunting purposes. His comments ignore common sense and has the potential to increase safety issues.

As a Hunter Ed instructor, Mr. Peters should be very aware of safety issues, but in this situation, seems to have overlooked safety for some bizarre bigger picture.

As a hunter and former H.E. instructor, I choose where I hunt and the clothing I will wear that day. I also choose what weapon I will hunt with – all prior to heading for the woods. Yes, there have been times I wished I had chosen differently, that that is part of the hunting experience.

The average hunter is not starving. Hunting is not the only way to put food on the table these days and having 2 weapons in the field will not dramatically reduce the deer herd as Peters claims. There is no need to have 2 weapons “just in case”.

Across the nation, the emphasis on Hunter Education has been safety. There have always been injuries and fatalities associated with hunting, but statistically the numbers have declined for many years. Now, someone wants to DOUBLE the chances of an injury or fatality – just to help reduce the deer herd by 1 animal? Seems a bit of a stretch.

I do not believe that allowing more than 1 weapon in the field is a responsible or logical act and I hope that the DEM staff will agree and not make the change requested.

With respect,

Matt H. Smith

9 Prosser Trail

Charlestown, RI 02813

May 14, 19

To Whom it may concern

I don't believe the bag
limit should be changed at this
time I had no problem catching
my limit but had to work at
it because of the rain every three
or four days and warmer weather
I know two other trappers that
didn't have a problem catching their
limit

It should be left a 4 fur
at least another year to see what
happen then

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