

## Fish and Wildlife Regulations Cost Benefit Analysis

Department of Environmental Management

Rules and Regulations for Hunting and Trapping Regulations for the 2021 – 2022 and 2022 – 2023 Seasons, Governing the Importation, Feeding, and Baiting of Cervids in Rhode Island, and Rules and Regulations Governing Importation and Possession of Wild Animals

### COST BENEFIT ANALYSIS

Rhode Island Department of Environmental Management | March 23, 2021

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#### Introduction

The Rhode Island Department of Environmental Management (DEM) has taken regulatory action to amend three sets of regulations, Rhode Island hunting and trapping (250-RICR-60-00-9), Governing the Importation, Feeding and Baiting of Cervids in Rhode Island (250-RICR-60-00-2), and Governing Importation and Possession of Wild Animals (250-RICR-40-05-3). The final sets of rules when promulgated are meant to facilitate the Departments selection of hunting seasons for multiple species available to hunt in Rhode Island, establish a procedure for the issuance of permits for the importation and possession within Rhode Island, and to protect the general public's safety and native wildlife resources of the state and to prevent the introduction of wildlife diseases into Rhode Island.

#### Changes to Regulations

The **R.I. Hunting and Trapping Regulations** that are being brought forward for promulgation to establish the hunting and trapping season, set possession and bag limits; and regulate the manner of hunting and trapping in order to efficiently manage the wildlife resources of Rhode Island. The **Rules and Regulations Governing importation and Possession of Wild Animals** establish a procedure for the issuance of permits for the importation and possession within Rhode Island of those exotic or native wild animals that are free of diseases and that do not pose a threat to humans, livestock and other domesticated animals, and native wildlife. These regulations also ensure that endangered and threatened species are not imported / possessed in the State of Rhode Island without a permit. The Importation regulations also allow importation / possession by only those persons who can demonstrate to the satisfaction of the DEM that they have adequate facilities, adequate knowledge of, animal health and husbandry, and the ability and resources to care for the subject animals in order to ensure public safety as well as the health and well-being of the imported / possessed exotic or native wild animal. The final regulation being discussed in this cost benefit analysis is the **Rules and Regulations Governing the Importation, Feeding, and Baiting of Cervids in Rhode Island**. This set of regulations is to protect the general public's safety and native wildlife resources of the state

and to prevent the introduction of multiple wildlife diseases into RI by prohibiting persons from importing, transporting, or possessing live cervids, carcasses or parts thereof in the State of RI as well as restricting the certain feeding and baiting practices that have been demonstrated to facilitate the spread of disease amongst animals.

The regulatory changes to the hunting and trapping regulations that will be discussed in this cost benefit analysis are the tagging requirements for hunters and a new section regarding propagation permits. The additional tagging language will make it possible for a hunter to transport their harvest out of the field in multiple pieces and have their animal taken to both a butcher, and to a taxidermist while following legal tagging requirements. The additional changes to the propagation language provide DEM additional information regarding the number and origin of birds imported to RI for hunting purposes and reduces the disease risks, wildlife population dynamic alterations and human safety concerns associated with releasing game birds.

In regard to the Importation and Possession of wild animals the Division added language in regard to short term exhibition which limits the amount of time that animals can be brought into the State, which will close a loop hole that is being created that is allowing exhibitors to keep wild animals as pets.

The final change that will be discussed in this cost benefit analysis is the new clarification language added to the Importation, Feeding, and Baiting of Cervids in Rhode Island. The change to this section is to protect the wildlife and domestic animals in RI from diseases that could be brought into the State.

The remaining changes to all the regulations have to do with language clarifications, tagging requirements, updating hunting season dates, reduction of muzzleloader check stations and permit clarification.

## **Cost-Benefit Analysis**

### **Statement of Need for the Proposed Plans**

#### **R.I. Hunting and Trapping Regulations for the 2021 – 2022 and 2022 – 2023 Seasons**

##### **Additional Tagging Requirements**

This requirement is more of an incentive for the hunter which will provide more options so that the hunter can choose how they wish to process their animal. Hunters will now be able to partially process animals to reduce the burden of taking out a whole animal and disposing of the unwanted portions in municipal waste facilities. This change also allows the simultaneous processing of harvested animals by both a butcher and a taxidermist so that both can legally have tagging requirements met and proper labelling of animal parts. The change may entice hunters to bring their game to an additional processor if they know they can legally tag both parts, however at this time we do not have numbers to determine either the number of hunters

that have their animals mounted nor the number that have their deer processed by a third party partially due to lack of oversight regarding transportation of deer parts between states. Hunters in Rhode Island currently have to print their own hunting license and tags in order to hunt, with this addition to the regulations it allows the hunters to print duplicate tags to attached to each part of the deer so the hunter nor the butcher or taxidermist could get into legal trouble for the possession of untagged deer parts. In 2020 the Division sold 18,008 deer tags to Non-residents and residents. In addition, hunters will now be able to transport deer out of the woods in parts which can save time and is easier to complete. It may also be safer for hunters that do not have the physical ability to drag an entire carcass out whole.

### **Propagation Permits**

The Division currently has nine private, registered shooting preserves in the State of Rhode Island, some charge visiting hunters per event they attend. With the change to the regulations it will provide the Division a clearer picture of how many birds are coming into the State, from which state(s) they are coming, and to provide information of the possibility of disease risk and concerns. The Division and hunters will benefit from this change as it will provide additional data to the Division proving that the animals that are being brought into hunt will be healthy and that there won't be a possibility of multiple diseases being brought into the State.

This change also places a cap on the total number of birds that can be released in a single day to prevent flooding the landscape with game birds. An overabundance of birds in a single area increases the risk of wounding animals, spreading disease and unsustainably bolstering predator populations in a single area. Additionally, too many game birds released in areas highly populated could increase the potential for disease transmission. Currently there is no limit on the number of birds that can be released in RI by day or by hunter numbers. Research suggests that most shooting preserves in the US release 8 – 15 birds per hunter and this cap is not anticipated to affect revenue or cause a decline in participation at shooting preserves.

### **Rules and Regulations Governing the Importation, Feeding, and Baiting of Cervids in Rhode Island**

#### **Importation of Cervids into Rhode Island**

The Division currently does not have any way to acquire data regarding the importation of cervids into RI. With the proposed changes to the regulation it would restrict the importation of cervids to RI to those that are licensed to do so through DEM which will require certification paperwork from a license Veterinary Inspection to prove that the cervid is negative from bovine tuberculosis, epizootic hemorrhagic disease, brucellosis, anaplasmosis, bluetongue, or other diseases as may be required by the RI DEM's Division of Agriculture. A single positive animal brought to RI could decrease revenue from hunting for years if not longer. The proposed change would also make it mandatory that the imported cervid be tagged which would make the animal trackable if it was able to escape from its enclosure. These proposed changes would provide security to the Division and citizens of RI that wild deer are not exposed to diseases

from imported animals. Preventing cervids from outside RI from entering the state is the best practice to reduce or prevent the transmission of several serious diseases especially CWD an untreatable deer disease that is fatal to infected animals.

### **Rules and Regulations Governing Importation and Possession of Wild Animals**

#### **The addition of the language non-resident and short-term**

The Division is aware of mobile exhibitors that come into the state with Wild Animals for shows for the public. Most of these exhibits or shows only last a short period of time, less than thirty days. This new language requirement would prohibit anyone being able to keep in their possession any wild animal for longer than thirty days, which in the State of Rhode Island it is illegal to possess wild animals. This proposed change would make it illegal for anyone other than short-term exhibitors, zoos and other licensed facilities to retain wild animals in Rhode Island. Specifically, this closes a loophole to prevents RI residents from taking wild animals as pets.

### **Alternatives**

The Division considered three alternatives to the regulatory changes being brought forward.

1. Status quo
2. Accept and move forward with proposed changes
3. Wait a regulatory cycle and bring forward again with the potential of diseases being brought into the State or new wild animals being retained as pets in the state.

Alternatives 1 and 3 in the long term could reduce the State license sales and permit sales if diseases were to be brought into the State and spread to the existing wild herd. A single positive animal brought to the state could result in the spread to wild animals and thereby cause significant declines in hunting related revenue. If the deer herd were to get sick it would mean less hunting opportunities and less revenue dollars coming into the State. Hunting annually provides Rhode Island an \$18 million benefit. The Division is looking to move forward with alternative 2 as accepting these changes. The enforcement of these proposed changes would not cause additional action or burden.