



Rhode Island
Department of Environmental Management

DIVISION OF FISH AND WILDLIFE

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To: Terrence Gray, P.E. Director, RIDEM

From: Phillip Edwards, Chief of Fish and Wildlife

Date: May 29, 2026

Subject: May 12, 2026 Public Hearing items on the R.I. Importation and Possession Regulations

Written Comment #4 and Exhibit 4 – R.I. Importation and Possession Regulations

Wayne Gerold - I see that DEM is amending TITLE 250, CHAPTER 40, SUBCHAPTER 05, PART 3. The term and definition for "dealer" are being added. What does this change from the current law/regs? Also, are there any other changes regarding captive animals other than the proposed ban on tegus and giant land snails?

The following is added: "Dealer" means any person who sells, exchanges, or donates, or offers to sell, exchange, or donate, animals to another dealer, pet shop, or research facility, or who breeds animals for the purpose of selling or donating to another dealer or pet shop or research facility as cited in R.I. Gen. Laws § 4-19-2(12).

Along with "dealer" being added following the Pet Store in several places. General Exemption for Pet Shops and Dealers. Exemption from individual exotic animal possession permits for Pet Shops and Dealers. Pet shops and dealers that are properly licensed and in good standing pursuant to R.I. Gen. Laws § 4-19-5 and R.I. Gen. Laws § 4-19-7 may be granted by the Department a resale permit in lieu of an individual exotic animal possession permit. The resale permit will allow possession of a reasonable number of a particular species to be kept on the licensed premises for the purpose of resale. Each species will require issuance of a resale permit for that species. The application for a resale permit will be provided by the Department and the fee will be five dollars (\$5.00) per permit issued. Animals held by a pet shop or dealer under a resale permit may only be sold to persons who can demonstrate lawful possession of the particular species, including an exotic animal possession permit if required.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined. Comments received ranged from strongly in opposition to any tegu possession to strongly opposed to any requirements for tegus in Rhode Island.

DEM Recommendation: **Minor Change. The addition of tegus to lizards that require a permit will be removed.**

Written Comments #5–9, 12, 13, 17, 19, 21–26, 28, 29, 31, 33–44, 46–48, 54, 55, 58, 59, 61–63, 65–69, 72, 76, 83–85, 87, 89–92 Exhibits 5–9, 12, 13, 17, 19, 21–26, 28, 29, 31, 33–44, 46–48, 54, 55, 58, 59, 61–63, 65–69, 72, 76, 83–85, 87, 89–92 – R.I. Importation and Possession Regulations

Nelson 5, Cody Swift 6, Kristian Baptista 7, Erica O’neill 8, Kayla Woodbury 9, Legacy Snore 12, Peter Duval 13, Ally Gorman 17, Erin Bloyed 19, Saylor Palmer 21, Rosemary Huard 22, Katie Testa 23, Brie Kramer 24, Casey Silva 25, Madison Proulx 26, Kasey Fielding 28, Landor VanMeter 29, Diane Pardini 31, Jeremy Nava 33, Barry Kennedy 34, Victoria Colacone 35, Justin Corr 36, Monica Fenner 37, Jen Lessard 38, Nick Frati 39, Jean Parkinson 40, Dana Andrews 41, Andrew Bagaglia 42, Victoria Nardolillo 43, Cameron Eldredge 44, Michelle Mercure 46, Myron Medeiros 47, Olivia Testoni 48, Donald Roberts 54, Delaney Roberts 55, Breanna Alvarez 58, Andrew Shappy 59, Chris Bujade 61, MAC 62, Matthew Boyes 63, Melissa Kenyon 65, Larry Brown 66, Sam Dougan 67, Mason Hemond 68, Nico Hemond 69, David Morgan 72, Jennifer Conklin 76, Jennifer Kloc 83, Anne Capezza 84, Adriana Toolin 85, Amanda Cervone 87, Ashley Firth 89, Ash Firth 90, Ashley Firth 91, Tammi Amato 92

- I write today as a Rhode Island resident opposing the proposed ban on two tegu genera, Salvator and Tupinamibis. The species in these genera are common pet lizards. I fully support protecting Rhode Island’s natural resources and wildlife, but these lizards are not an invasive species threat in our state or invasive within 1,000 miles of our state. This ban is unreasonable. There is no valid reason to stop the ownership, trade, and commercialization of this species.

This prohibition is unjust and unfair, with no justification such as invasive species or public safety risks. Thank you, and have a good day.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #10 Exhibit 10 – R.I. Importation and Possession Regulations

Cameron Calkins - You're probably getting a lot of emails that look pretty much the same sentiment. I'd like to appeal to you as the Supervising Wildlife Biologist of RI DEM. My education is in Marine Biology From Roger William University (1983). So we're both grounded in science.

We know that this proposed change is a reaction to the unfortunate events of January with the Tegu found buried in the snow. The emotional response is "we must do something!" But this is an overreach. This is a case of an escaped animal or animal abuse (I do not have the details), and responsible keepers and pet owners should not suffer because of the actions of carelessness or abuse by a single individual. There is no environmental/invasive species threat from Tegus here in New England. There is a Tegu breeding community, so these animals are not being removed from their native range. There no reason to take pets away from people. I know neurodivergent individuals who benefit from their interactions with these animal, and they will suffer from this ban.

I urge you to reject the proposed ban.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #11 Exhibit 11 – R.I. Importation and Possession Regulations

Cameron Huard - Ive learned so much from watching these intelligent creatures. theres no reason they should be banned in RI, as evident by the one found that was unfortunatley released it would have died without human intervention. they cant survive up here. they arent invasive within 1000 miles of us. this is unfair to not only myself, but the thousands of other keepers in RI who keep these intelligent and gentle animals.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #13 Exhibit 13 – R.I. Importation and Possession Regulations

Vee Giusti - I am using a sample letter below as words escape me. The proposed ban on a common exotic pet, that poses no threat to our ecosystem as the animal is unable to survive in the wild of our regional climate strikes me as a vast overreach of power.

I write today as a Rhode Island resident opposing the proposed ban on two tegu genera, Salvator and Tupinamibis. The species in these genera are common pet lizards. I fully support protecting Rhode Island's natural resources and wildlife, but these lizards are not an invasive species threat in our state or invasive within 1,000 miles of our state. This ban is unreasonable. There is no valid reason to stop the ownership, trade, and commercialization of this species.

This prohibition is unjust and unfair, with no justification such as invasive species or public safety risks. Thank you, and have a good day.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #15 Exhibit 15 – R.I. Importation and Possession Regulations

Jill Miller - I write today as someone who is highly passionate about responsibility keeping reptiles, the education on wildlife, and the protection of the environment. I am opposing the proposed ban on two tegu genera, Salvator and Tupinamibis. The species in these genera are common pet lizards. I fully support protecting Rhode Island's natural resources and wildlife, but these lizards are not an invasive species threat in our state or invasive within 1,000 miles of our state. This ban is unreasonable. There is no valid reason to stop the ownership, trade, and commercialization of this species.

This prohibition is unjust and unfair, with no justification such as invasive species or public safety risks. Thank you, and have a good day.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation

change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #16 Exhibit 16 – R.I. Importation and Possession Regulations

Meighan Belanger - I'm writing as a Rhode Island resident to oppose the proposed ban on the tegu genera Salvator and Tupinambis. These are commonly kept pet lizards and there isn't any evidence that they pose an invasive threat here or even anywhere close to our region in New England.

I absolutely support protecting Rhode Island's wildlife and natural resources but this ban just doesn't make sense. There's no valid reason to restrict the ownership, sale or breeding of these animals when they aren't a risk to our environment or public safety.

This feels like an unnecessary and unfair restriction without real justification.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #18 Exhibit 18 – R.I. Importation and Possession Regulations

Linda Bigden - As one of the millions who became aware of the snowstorm Tegu rescued in Providence RI, I am respectfully asking that the proposed ban for these reptiles in RI not be passed. This reptile would not have survived in the RI climate, were it not for the quick response of a resident who saved her from certain death from freezing and the intervention of vets. She is in the care of ET Reptiles and living her best life. Reptiles like her rather than be banned should and could serve as wonderful pets and sources of learning and education opportunities for youth and adults in our state. This species is not native to RI. They are not invasive reptiles in RI. A ban for Tegus from being owned by private persons and responsible businesses such as ET Reptiles in RI would be unjust and unreasonable; not only to her but to responsible individuals who would like to have such a reptile. I am asking that rather than ban her and others of her species, more awareness and education as to responsible ownership be made as to the care of Reptiles

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #27 Exhibit 27 – R.I. Importation and Possession Regulations

Kendall Brinson - I am writing as a Rhode Island resident to express my opposition to the proposed ban on tegu species in the genera Salvator and Tupinambis.

I fully support efforts to protect Rhode Island's natural resources and wildlife. However, tegus do not pose an invasive species threat in our state, nor are they established as invasive anywhere within a significant geographic range of New England. A statewide ban is not supported by ecological evidence and does not reflect the realities of our climate.

This proposal appears to be a reaction to a single, unfortunate incident this past winter involving the escaped or released tegu. While concerning, the actions of one owner should not dictate policy that impacts responsible keepers across the entire state. Broad prohibitions are not an effective or fair response to isolated cases of neglect.

Instead, I strongly encourage the state to consider alternatives that promote responsible pet ownership. Educational outreach and community engagement would be far more effective in preventing similar situations in the future. Local organizations such as ET Reptiles, which responsibly rehabilitated the animal in question, and groups like the New England Herpetological Society are well-positioned to support public education efforts, husbandry guidance, and outreach initiatives.

Policies should be rooted in science, fairness, and practical solutions. This proposed ban does not meet those standards and would unnecessarily impact responsible pet owners, small businesses, and educational communities.

Thank you for your time and consideration.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #32 Exhibit 32 – R.I. Importation and Possession Regulations

Michael Welker - Tegus make great pets. This ban is animal rights BS! If one was to happen to escape they could not survive in the wild in Rhode Island this ban is utterly ridiculous. Please fire whoever came up with this ridiculous ban that takes away the rights of Rhode Island citizens. I have been a herpetologist for over 40 years.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #45 Exhibit 45 – R.I. Importation and Possession Regulations

Kimberly Alpert-I am a concerned member of the reptile community with some questions about the proposed changes to RI law pertaining to Tegus.

Are there any studies proving Rhode Island can support a wild tegu population? If so, could that documentation be provided so we can read it for furthering our knowledge?

If the permitting process did go through, what is the plan for a grandfathering process to those who already own tegus?

Additionally Where would these seized tegus be housed if someone was found to own one without a permit? Would they all be euthanized? Looking forward to your reply and thank you in advance.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation

change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #49 Exhibit 49 – R.I. Importation and Possession Regulations

Pia Vartabedian- As a resident of Cranston, I support stronger regulations to protect tegus. While a complete ban on the possession of tegus would be the most responsible course of action, the DEM's proposed regulation requiring a permit to possess them is a step in the right direction. When tegus escape their enclosures, or are purposely released, the outcome can be detrimental to the tegu and native wildlife.

I strongly support the DEM's proposal to require a permit to possess tegu species in the genera Salvator and Tupinambis. Thank you for your time and attention.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #50 Exhibit 50 – R.I. Importation and Possession Regulations

Lorraine Shelly-At the very least permits and microchipping (if possible) should be required for owning Tegus such that the owner can be traced if the animal is lost or intentionally released. Minimal habitat requirements should be developed and enforced for the safety and well being of animals that are not native to RI.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #51 Exhibit 51 – R.I. Importation and Possession Regulations

Nancy Robinson-I know the best course here (and should be the only course) is leaving these beautiful creatures in their natural habitat without selfish human intervention. Banning them is another, but what happens to the ones that are already here, spending their lives in captivity because someone decides they want one for no other reason than 'it's cool'?

Sending them to a sanctuary if they can never be released back into their natural habitat is the only recourse.

No one for any reason should ever think they have the right to 'own' any animal.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #53, 56, 57, 64, 70, 93, 94 Exhibit 53, 56, 57, 64, 70, 93, 94 – R.I. Importation and Possession Regulations

Jaiden Velez 53, Cameron Eldredge 56, Victoria Nardolillo 57, Jerelle Gaiter 64 Aaron Smith 70, Stanley Koziol 93, Jill Miller 94

- I am a Rhode Island resident and responsible animal owner who opposes the onerous exotic animal permit for two genera of tegu lizards. This is unfair to current owners who now need to meet the new requirements to be compliant. For many reasons, these new permit stipulations may prove too burdensome or even unattainable for current owners, who will then be required to euthanize or rehome their animals. DEM regulations must be reasonable and responsible reptile owners deserve legitimate, scientific, and rational reasons for the heavy permitting on tegus. If there is a valid rationale, there needs to be a less onerous regulation for current owners, such as waiving the permit requirements to make it a simple registry. This should also be considered for future owners. Please do not let the negligent actions of one person lead to the collective punishment of the many responsible reptile owners in the state. Thank you for your consideration, and have a good day.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #60 Exhibit 60 – R.I. Importation and Possession Regulations

Nicole Waybright-I am a lifelong Rhode Islander and resident of Woonsocket.

I am writing to you in support of the DEM's proposal to require a permit to possess tegu species in the genera Salvator and Tupinambis.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #71 Exhibit 71 – R.I. Importation and Possession Regulations

JoAnn Algasso-I have been made aware that you are considering requiring a permit to own a tegus. As a resident of Warwick, I fully support this. The more protection the better for them or any animal is essential

There are far too many people that get an animal that they are not prepared for and either end up releasing them to fend for themselves or put them in an abusive situation. Unfortunately there are also people who acquire animals with bad intentions. Safeguards are a good thing.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation

change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #73 Exhibit 73 – R.I. Importation and Possession Regulations

Tylor Faria- My name is Taylor Faria, and I am a reptile keeper, educator, and co-owner of a reptile store in Rhode Island. I am writing in opposition to the proposed restrictions on tegus because the current permitting process is already overly complicated, and these additional regulations will negatively affect responsible owners, educators, rescues, and small businesses across Rhode Island. Our business works directly with these animals every day, and we currently house and care for the tegu that was rescued during the blizzard this winter. Through firsthand experience, we have seen how intelligent, manageable, and educational these animals can be when kept responsibly.

To be clear, the issue is not the \$5 permit fee itself. The issue is the complexity and inconsistency of the permitting process, particularly the second page requirements and approval standards. Many highly experienced and respected reptile keepers in our community have still been denied permits despite having excellent husbandry practices and years of experience. That creates uncertainty and discourages responsible people from participating in the system at all.

Rhode Island already has a permitting structure in place for monitor lizards and other larger reptiles. In practice, many people who are interested in large, intelligent lizards choose tegus specifically because they are a more practical and accessible alternative. Responsible keepers who do not want or cannot obtain monitor permits have found tegus to be an excellent option.

Many reptiles, including tegus, are also used for educational programs that teach children and the public about animal care, conservation, and responsible ownership. These animals help replace fear with understanding, and responsible keepers play an important role in that education. Our tegus are regularly used to educate families and customers about proper husbandry, conservation, and respect for exotic animals.

The problem with overly restrictive permitting is that it discourages responsible people from reaching out for guidance, veterinary support, or husbandry advice because they fear penalties or losing their animals.

That creates the opposite of what these regulations are supposed to accomplish. It pushes ownership underground instead of encouraging responsible, transparent care.

Small businesses, breeders, rescues, and educators will also be hurt by the paperwork, delays, uncertainty, and inconsistent approvals these regulations create. Responsible reptile keepers are not against regulation. We support practical standards for safe housing and responsible ownership. But this proposal creates barriers that many ordinary people and small businesses realistically cannot keep up with.

Punishing responsible owners because of isolated incidents or hypothetical concerns is not the right approach. Rhode Island's climate already makes long-term survival and establishment in the wild extremely unlikely, and regulations should focus on practical, workable standards that encourage education, cooperation, and responsible care instead of pushing people away from the system.

I respectfully ask that you reconsider these restrictions and work with responsible keepers, educators, veterinarians, and small businesses to create fair and effective regulations that actually improve animal welfare and public safety.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation

change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #74 Exhibit 74 – R.I. Importation and Possession Regulations

Emari Green- I write today as a Rhode Island resident opposing the proposed ban on two tegu genera, Salvator and Tupinambis. The species in these genera are common pet lizards. I fully support protecting Rhode Island's natural resources and wildlife, but these lizards are not an invasive species threat in our state or invasive within 1,000 miles of our state. This ban is unreasonable. There is no valid reason to stop the ownership, trade, and commercialization of this species.

I want to add that I work at a small business that cares for these species and have had firsthand experience with them for years. These restrictions make it harder for people, such as myself, to educate others on responsible keeping and proper conservation efforts for exotic animals.

Tegus thrive in the proper environment set up at home, not out in Rhode Island's natural climate, which is why we push for education on these animals rather than restricting access to them. The lack of education about them leads to tedious permitting processes that are typically not done by keepers themselves, often ending with responsible owners unable to be approved.

Many Rhode Island residents are very passionate about reptile keeping, especially tegus in specific. Restrictions shouldn't be based on one off incidents that do not represent the average owner, so we ask for your help to not go through with this ban. This prohibition is unjust and unfair, with no justification such as invasive species or public safety risks. Thank you, and have a good day.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #75 Exhibit 75 – R.I. Importation and Possession Regulations

Maria Stambler-As a resident of Warwick, I support stronger regulations to protect tegus. When tegus escape their enclosures—or are purposefully released—the outcome can be detrimental to the tegu and native wildlife. Therefore I fully support the DEM's proposal to require a permit to possess tegu species in the genera Salvator and Tupinambis.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #77 Exhibit 77 – R.I. Importation and Possession Regulations

Gabriel Montague-Department of Environmental Management,

I have been a zookeeper for over 20 years and a resident of RI for the last 11. I am also a responsible animal owner who opposes the onerous exotic animal permit for two genera of tegu lizards. This is

unfair to current owners who now need to meet the new requirements to be compliant. For many reasons, these new permit stipulations may prove too burdensome or even unattainable for current owners, who will then be required to euthanize or rehome their animals.

DEM regulations must be reasonable and responsible reptile owners deserve legitimate, scientific, and rational reasons for the heavy permitting on tegus. If there is a valid rationale, there needs to be a less onerous regulation for current owners, such as waiving the permit requirements to make it a simple registry. This should also be considered for future owners. Please do not let the negligent actions of one person lead to the collective punishment of the many responsible reptile owners in the state. Thank you for your consideration, and have a good day.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #78 Exhibit 78 – R.I. Importation and Possession Regulations

Landon VanMeter- Department of Environmental Management,

I am a Rhode Island resident and a responsible animal owner who opposes the onerous exotic-animal permit for two genera of tegu lizards. This is unfair to current owners who now need to meet the new requirements to be compliant. For many reasons, these new permit stipulations may prove too burdensome or even unattainable for current owners, who will then be required to euthanize or rehome their animals.

DEM regulations must be reasonable and responsible. Reptile owners deserve legitimate, scientific, and rational reasons for the heavy permitting on tegus. None of the tegus pose invasive-species risks, and there needs to be less onerous regulation for current owners, such as waiving permit requirements and establishing a simple registry instead. This should also be considered for future owners if DEM provides a valid rationale for requiring permitting. Please do not let the negligent actions of one person lead to the collective punishment of the many responsible reptile owners in the state. Thank you for your consideration, and have a good day.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #79 Exhibit 79 – R.I. Importation and Possession Regulations

Aanya Sorenson- I write today to share my thoughts on the “invasive “ tegu act ban for the Salvator and Tupinambis. These are common captive tegus and I fully support protecting and keeping the wildlife safe but those tegus are not a threat to society. They are not an invasive species , the reality is people are the problem for these animals, people SHOULD NEVER get an exotic pet if they won't care for it and keep it captive where it belongs, the animals aren't the harm if it's anything it's the people. And banning species is simply unnecessary it's not fair to anyone especially the animals, they show no harm to be considered a invasive species there is no valid reason to stop the ownership of these animals That would be completely inhumane to these animals,- have a good day

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #80 Exhibit 80 – R.I. Importation and Possession Regulations

Marco Gomez- As a Rhode Island resident, I implore you to stop the excessive exotic animal permit for two genera of tegu lizards. While I support animal welfare and responsible pet ownership, this new proposal is extremely unnecessary and overreaching. The permit stipulations are too burdensome and unattainable for most current owners, which means a lot of us will rehome our pets. As someone who has had a pet tegu for almost a decade, I feel that I am being unjustly punished without any legitimate rationale. Pets are members of our family, so it is devastating to hear that I will have to potentially get rid of what is essentially one of my family members. Overall this proposal is extremely far-reaching and all it will do is punish ordinary citizens instead of just the bad actors. Please for the sake of all tegu owners in Rhode Island, reconsider this excessive proposal.

Thank you for your time and consideration on this matter. Have a good day.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #81 Exhibit 81 – R.I. Importation and Possession Regulations

Greg Mertz- We're happy to talk with you about tegus as pets. My sense is that no tegu would survive the winters here in New England out of doors. Also, it is rare(I think this is the first one) for us to see an escaped tegu. The tegu we treated with the frostbite on tongue and toes was lucky because he was found early in his outdoor adventure. He was in rough shape when he was presented to us.

We're happy to talk further with you if you wish.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #82 Exhibit 82 – R.I. Importation and Possession Regulations

Emily Arpin- I wanted to reach out after attending the meeting last Tuesday, May 12th regarding the proposed regulation that would add Salvator and Tupinambis to the list of species requiring an exotic animal possession permit. My name is Emily Arpin and I am the co-owner of ET Reptiles, a reptile-based shop located in Warwick. I not only am a responsible keeper of exotic animals, but

also actively educate our local community on proper reptile care and husbandry. Although I had spoken at the meeting that night, I would like to address my concerns in writing, as well as some points I may have missed.

I would first like to address a publication from USGS, "Modeling current and future distribution of invasive tegu lizards along geopolitical boundaries in the contiguous United States: Implications for invasive threat" from July of 2025. Through this publication, it is suggested that under three different climate scenarios the most considered states are Louisiana, Georgia, and Florida, where their climates are warmer. Even when assessing climate changes such as a rise in temperature across the U.S., there was a "negligible impact" on their findings towards Rhode Island and New England states as a whole. The publication's concerns are addressing the Western and Southeastern states, as well as states where sightings have already been occurring.

Climate, prey availability, competition with native wild species, land cover attributes such as vegetation all play an important role to tegus sustainability, the ability to reproduce, and become an invasive species within our state. There is no official data or established trend showing multiple tegus being dumped or escaping their homes in Rhode Island, showing that escapees are extremely rare. Pet tegus are generally known for their intelligence and can become highly socialized animals when properly cared for, which has contributed to their growing popularity in the reptile community. Frankie, the "Blizzard Lizard", was found in January of this year under 20 inches of snow with frostbitten tips of the fork of her tongue, a full-body stuck shed that was frozen to her body, and minimal movement in any of her limbs. While her recovery is miraculous and we are grateful for having the opportunity to rehab this tegu, her story strongly demonstrates that tegus do not pose a threat in Rhode Island or that the current reptile keeping community as a whole is irresponsible or uncaring. Frankie's story was only made possible due to our dedicated veterinarians, who had to reference human frostbite case studies because this level of injury had not been documented in a reptile case that they could compare it to. Frankie's case received significant local and national attention precisely because survival under her circumstances is so extraordinary.

As a business that works directly with Rhode Island's local reptile keepers every day, we consistently see how responsible and dedicated this community truly is. Many keepers invest significant time, money, education, and effort into proper husbandry, veterinary care, enclosure standards, nutrition and enrichment for their animals. The vast majority of people we interact with care deeply about the wellbeing of their reptiles and actively seek guidance to ensure they are providing the highest standard of care possible. The current population of responsible reptile keepers in Rhode Island will be the ones most likely to comply with any regulations set into place, while irresponsible owners and animal dumpers usually ignore laws entirely. I fear that adding this regulation only risks transparency of trusted, built relationships between keepers and educators that can provide husbandry advice or help when needed due to fear of confiscation or being fined.

Another concern is that the proposed permitting process appears far more extensive than what would reasonably be necessary if the primary goal is to simply document where these animals are being kept in the event of an escaped animal. If the intent is location awareness and accountability, it is difficult to understand why the application additionally requires source information, detailed husbandry explanations, signed approval from animal control officers, confirmation that this animal is not invasive from the Chief of RI DEM Division of Fish and Wildlife, and three personal references. The overall process feels less like a registration system and more of a highly restrictive barrier to ownership, even for experienced and responsible keepers. There also does not appear to be a clearly defined standard outlining under what specific circumstances a permit could be denied if an applicant has fully completed all required procedures and documentation. Clear standards and expectations are important for not only fairness and consistency, but also for encouraging confidence and participation in regulations.

This regulation feels less focused on protecting this species in captivity and more directed towards restricting a group of knowledgeable, ethical, and experienced keepers based largely on the reaction to a single highly publicized incident. While public safety and environmental concerns should be absolutely taken seriously, broad regulatory measures should be rooted in consistent data, long-term trends, and collaborative discussion with the reptile keeping community members who already prioritize responsible containment, husbandry and animal welfare.

To conclude my outreach email, I would like to urge the Department of Environmental Management to work directly with experienced keepers and businesses on a reasonable, science-based solution rather than regulations that could unintentionally harm responsible owners and small local businesses. Regulations should directly address neglect, abandonment, and unsafe housing practices rather than create unnecessary barriers for responsible reptile keepers.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #86 Exhibit 86 – R.I. Importation and Possession Regulations

Dylan Jones- I hope this letter finds you well. Unfortunately, I write today as not only a Rhode Island resident but also as a long time tegu owner who is opposed to the proposed ban on two tegu genera, Salvator and Tupinambis.

The species in these genera are common pet lizards. I fully support protecting Rhode Island's natural resources and wildlife, but these lizards are not an invasive species threat in our state or invasive within 1,000 miles of our state.

This ban is unreasonable. There is no valid reason to stop the ownership, trade, and commercialization of this species. This prohibition is unjust and unfair, with no justification such as invasive species or public safety risks. Thank you, and have a good day.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Written Comments #88 Exhibit 88 – R.I. Importation and Possession Regulations

USARK via Phil Gross- Re: Opposition to Proposed Exotic Wild Animal Permit Requirement for Tegus in

Salvator and Tupinambis Under 250-RICR-40-05-3

Dear Mr. Kalb and Rhode Island Department of Environmental Management,

The United States Association of Reptile Keepers (USARK) respectfully submits the following public comment regarding the Rhode Island Department of Environmental Management's proposed amendments to the regulations governing the Importation and Possession of Wild Animals, 250-RICR-40-05-3.

USARK OPPOSES adding tegus in the genera Salvator and Tupinambis to the list of animals requiring an Exotic Wild Animal possession permit. While the proposal is not

framed as a complete prohibition, the existing Exotic Wild Animal permit application is burdensome, discretionary, and unclear as applied to current lawful tegu owners. In practice, a discretionary permit system is a de facto ban if permits are denied or conditioned on requirements that ordinary responsible pet owners cannot reasonably satisfy.

Need for Transparency Before Adoption

Stakeholders should not be required to support or oppose a permit system without knowing what DEM will actually require of tegu owners. The Exotic Wild Animal permit application states that the Department may waive certain requirements depending on the species, but it does not specify which requirements will apply to tegus or which may be waived. That uncertainty is unfair to current owners and prevents meaningful public comment.

If DEM has legitimate grounds to require permitting for tegus, USARK respectfully requests that DEM publish, before adoption, the specific permit requirements that would apply to tegus, including any inspection, veterinary, facility, experience, and reporting requirements, fees, and standards for approval or denial.

Since tegus are not a justifiable invasive species threat in Rhode Island, if other bona fide concerns exist for the Department, a simple registry system would address those concerns without imposing oppressive burdens on responsible animal owners.

The USGS Paper Does Not Justify Burdensome Permitting in Rhode Island

DEM justifies restricting tegus by citing the recent USGS habitat-suitability paper, Kissel et al. (2025), which models the potential future distribution of tegu lizards in the United States under extreme future climate scenarios. This paper does not provide evidence that tegus can establish self-sustaining populations in Rhode Island under current or near-term conditions. It models theoretical habitat suitability based primarily on climate matching, not actual establishment risk. Most recent climate-matching models for potentially invasive reptiles rely on mean (average) temperatures and ignore other factors, such as coldest temperatures, days below the tolerable temperature, suitable habitat, and appropriate resources. A flawed “climate match” alone is not grounds to argue an invasive species threat.

The paper, and by extension DEM, relies on hypothetical future warming scenarios of +2°C and +4°C to justify this proposed restriction. Those scenarios are speculative longterm projections, not current or near-term Rhode Island conditions. Current and near-term weather in Rhode Island has not been shown to provide suitable habitat for tegu establishment. The only black-and-white tegu (*Salvator merianae*) found free-roaming in Rhode Island was suffering from severe frostbite and would not have survived the rest of the winter, or likely even a few more hours, had it not been rescued.

Even under extreme future climate-change scenarios, the paper provides no evidence that tegus would be able to survive and establish self-sustaining populations in Rhode Island. At best, it suggests theoretical climatic suitability in some areas under modeled assumptions. It does not address the practical biological question that matters for regulation: whether tegus can persist, reproduce, establish populations, and spread in Rhode Island.

It is also important to keep climate assumptions in context. The level of climate change associated with the most aggressive projections would have major consequences for Rhode Island, including increased coastal flooding, erosion, storm-surge risk, and sealevel-rise impacts. It is not reasonable to rely on long-term, potentially extreme climatechange scenarios to impose immediate permit burdens on present-day owners. We have witnessed some invasive-species climate speculations that would wipe humans from the

planet, yet they claim there is a concern for invasive-species spread, even though we would no longer be here to care about it.

USARK does not believe that DEM should ignore climate science, but that it should apply it reasonably and be critical of the methodology and bias. We have seen “scientific” claims that Maryland has a climate suitable for Burmese pythons and that Montana could have a climate suitable for sustaining Burmese pythons by 2050. Neither claim is factual or good science. Current conditions do not justify restricting tegus in Rhode Island. If future conditions do, the issue should be revisited.

Species-Specific Evaluation Is Required

USARK urges DEM to evaluate tegus on a species-specific basis rather than as a blanket group. Tegus differ significantly in biological traits, climate tolerances, prevalence in the pet trade, and likelihood of escape or release. Some species are more cold-tolerant than others, while others are tropical. A blanket listing of both genera fails to account for these differences and risks imposing restrictions unsupported by species-specific evidence.

The proposed language would place all tegus in the genera *Salvator* and *Tupinambis* into the same regulatory category. That is overbroad. Tegus in the genus *Tupinambis* are almost exclusively found in the tropics. While species in *Tupinambis* may risk establishment in southern Florida, even under the most extreme climate predictions, these tropical species will not be able to survive a Rhode Island winter.

Even if DEM insists on regulating or banning tegus in the genus *Salvator*, those in the genus *Tupinambis* are not adequately restricted under the logic of their potential invasiveness.

A Registry or Targeted Escape-Prevention Rule Is a Less Restrictive Alternative

If DEM insists that greater oversight is necessary, a simple registry and indoorkeeping/escape-prevention requirement would be more reasonable than the Exotic Wild Animal permit process. Rhode Island already uses this less burdensome approach for reared slider turtles, requiring responsible possession conditions and recordkeeping rather than a comprehensive discretionary permit for exotic animal possession.

A registry would enable DEM to identify lawful owners, provide educational materials, communicate expectations for husbandry and escape prevention, and respond to legitimate concerns without imposing a de facto ban.

USARK supports responsible ownership and effective enforcement against negligent release or escape. USARK opposes unclear, burdensome permitting requirements for responsible owners who have lawfully kept these animals.

Fair Treatment of Current Lawful Owners

At a minimum, any rule must include a clear grandfathering provision allowing current lawful owners to register their animals. Current owners should not be forced to surrender, rehome, or euthanize animals that were lawful when acquired because of oppressive permits. If DEM proceeds with any new requirement, current owners should be allowed to keep their animals through a simple registration process, without being subjected to the full Exotic Wild Animal permit process.

A new rule should not retroactively penalize pet owners for conduct that was lawful at the time. Nor should the actions of a single negligent person result in collective punishment of the broader responsible herpetocultural community.

USARK's Requested Action

USARK respectfully requests that DEM:

1. Remove tegus in the genera *Salvator* and *Tupinambis* from the proposed Exotic Wild Animal possession permit requirement;
2. Publish the specific scientific basis and risk assessment relied upon for Rhode Island,

- including any species-specific analysis;
3. Publish the exact permit requirements that would apply to tegus before adopting any final rule;
 4. Provide an additional public comment period after that information is released;
 5. Adopt a simple registry and escape-prevention approach rather than a comprehensive discretionary permit system if DEM believes some regulation is necessary; and
 6. Grandfather current lawful owners through a simple registration process without forcing them into burdensome permit requirements.

Additionally, several responsible Rhode Island herpetoculturists are willing to collaborate with DEM. They have requested a workshop focused on Rhode Island's herp regulations and the Exotic Wild Animal possession permit. Please consider working with dedicated herp keepers in Rhode Island on this and future regulations. They, as well as USARK, support practical and reasonable regulations.

Conclusion

USARK supports science-based wildlife policy and reasonable regulatory measures. However, the proposed permit requirement for tegus is not justified by the current record. The USGS paper is too speculative to justify burdensome permitting in Rhode Island, and DEM has not demonstrated that current or near-term Rhode Island conditions support tegu establishment.

USARK respectfully asks DEM not to include tegus in Salvator or Tupinambis in the Exotic Wild Animal possession permit requirement. If DEM proceeds with regulation, it should adopt a transparent, less restrictive registry-based approach and ensure fair treatment of all current lawful owners. We also request that DEM involve responsible herpetoculturists in any future rulemaking during the drafting and research process, rather than proposing rules without that collaboration.

Since there is no urgency regarding this issue, remove this tegu permit proposal and revisit it during a workshop with herpetoculturists. Thank you for your consideration of these comments.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Oral Comments from open hearing #1 Exhibit 95 – R.I. Importation and Possession Regulations

Kimberly Alpert- Good evening and thank you for the opportunity to speak tonight regarding the proposed amendments to 250-RICR-40-05-3. My name is Kimberly Alpert and I am the Treasurer of the New England Herpetological Society here to represent our members in Rhode Island. The NEHS is a 501c3 Non-profit dedicated to supporting education and conservation regarding herptiles in the New England area as well as those kept in captivity. I appreciate the Department's responsibility to protect Rhode Island's environment and public safety. However, I respectfully oppose both a ban and the newly proposed permit requirements for tegus because I do not believe there is sufficient evidence showing that additional regulation is necessary in Rhode Island. For years, responsible owners and breeders in this state have safely kept these animals without documented problems involving established wild populations, environmental damage, or widespread public safety concerns. In preparing for tonight, we reviewed available information going back several years, and

we could not find evidence of any meaningful tegu-related problem occurring in Rhode Island. I am aware that recent studies have examined how climate change could potentially expand suitable habitat for certain tegu species in parts of the United States. However, it is important to understand what those studies actually say — and what they do not say. The study most often referenced modeled broad climate suitability across large geographic regions using computer projections. The authors themselves acknowledged important limitations, including that the models do not account for many real-world survival factors such as prey availability, land cover, breeding success, detection uncertainty, and microclimates. Most importantly, the study does not conclude that tegus can establish self-sustaining breeding populations in Rhode Island or throughout the Northeast. In fact, even the researchers noted that their work represents only a theoretical climate suitability model — not proof that populations could successfully survive, reproduce, and spread in a given state. Tegus are reptiles that depend heavily on heat, controlled environments, and specialized husbandry to survive and thrive. In captivity, they require heated enclosures, UVB lighting, regulated humidity, and carefully maintained temperatures year-round. Rhode Island's winters include prolonged freezing temperatures, frozen ground conditions, and extended periods far below the temperature's tegus require for normal activity and survival. Because of these environmental realities, I respectfully question whether there is sufficient Rhode Island specific evidence showing these animals could realistically establish and sustain breeding wild populations here. I am also concerned that creating permit requirements for animals that have been responsibly kept for years may unintentionally burden compliant owners while doing little to address irresponsible behavior. Law-abiding keepers are often the people most willing to cooperate with the Department, maintain proper enclosures, and seek veterinary care when needed. I am additionally concerned about unintended consequences. When regulations become overly restrictive or confusing, some individuals may become fearful about seeking help, rehoming animals responsibly, or remaining transparent about ownership. I do not believe anyone wants policies that could unintentionally increase abandonment, improper release, or animal welfare concerns. Most responsible reptile keepers are not asking for special treatment. We are simply asking that the state continue the approach that has already worked successfully for many years without demonstrated problems. I respectfully urge the Department to reconsider these proposed changes and leave the current regulations in place unless and until there is clear Rhode Island specific evidence showing that additional restrictions are truly necessary. Thank you very much for your time and consideration.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Oral Comments from open hearing #2 Exhibit 96 – R.I. Importation and Possession Regulations
Phil Goss- I am Phil Goss president of the United States Association of Reptile Keepers otherwise known as USARK here on behalf of our members in Rhode Island. USARK is a 501(c)(6) federal nonprofit so we have members in every state and in the United States we even have international members and I speak in issue such as this and have been doing it since 2013 so in honesty I actually appreciate the drive here so. I'm from rural Indiana so I'm happy to see something like this rather than going to the state house to have a meeting like this. So, if you're not that familiar with tegus the ones that are listed to be banned and which USARK opposes the required permit, the closest established invasive population of these is over 1300 miles away. It's nowhere close to Rhode Island

there are several southeast states who have regulated or restricted these species, but they are only breeding in south central and southern Florida. They have found quite a few in Georgia, but they haven't found any hatchlings or babies in Georgia so they're not actually truly invasive in Georgia yet until obviously they're reproducing and hatching in that state. So southern Georgia's about, I don't know, 1100 miles away then you go and add a couple hundred miles from where there's actually feral populations of tegus in the United States. So again about 1300 miles away and clearly, they cannot survive anything close to this climate. I've heard reports with other state agencies that they're listed as invasive in South Carolina and that's not true as of about a year ago. it's kind of the same situation with Georgia. They found I think about 13 the last time I checked. But again, there were adults that we think we know where they came unfortunately from one irresponsible keeper and they're not breeding and they're not hatching out in South Carolina so again they're not actually invasive there. And most of the states except for Florida and Arkansas actually only ban one species so you got several species that are proposed for this permit. Most of the ones again except for those two states that I mentioned only regulate or restrict *Salvator merianae* which is the Argentine black and white tegu and also includes the blue tegu which is a subspecies of the Argentine black and white tegu it doesn't include the red tegus or the other species that are listed on your proposed permit. And if you do go forward with the permit requirement, you know the fees pretty negligible it's only a 5 dollar fee for the permit but the issue you're going to have with getting people to sign up for that permit is page 2 of your permit process it's pretty onerous it's pretty burdensome on people and it's especially not fair for people who already have those animals so that it forces them to jump through all those hoops for animals that they're already keeping responsibly is really unfair if you do go forward with the permit system all of that page 2 and those requirements should only apply to new owners and shouldn't apply to anybody who currently has the animals cause again that's really unfair to ask them to do all that stuff after they've maybe already had the animal for 5 10 or even 15 years because in captivity these lizards can live 20-30 years. and I'll be more than happy to answer any questions. I'm pretty well versed on tegu regulations and those southeastern states. I know you're not; you don't have to engage here but I can answer questions to the best of my ability if you have any questions for me.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Oral Comments from open hearing #3 Exhibit 97 – R.I. Importation and Possession Regulations

Emily Arpin- Hi, my name's Emily Arpin and I'm with ET Reptiles and I'm both a responsible reptile keeper and small reptile business owner in Rhode Island. I strongly oppose the tegu permit system because we do not believe it reflects realities of our state climate or the responsible reptile community that is based here. Tegus are being portrayed as a major ecological threat however Rhode Island is simply not a suitable environment for them to establish a population or have an opportunity to make server impacts on our local wildlife or native plants. The assumption that is being implied in the discussions around tegus appears to be overstated when considering both their actual dietary intake and environmental restrictions. Our winters are truly harsh, and these animals are not capable of surviving long term outdoors in our climate. Frankie, who is the carrier over there which many know as the blizzard lizard was found in January under 220 inches of snow and while her story in miraculous it was only made possible after many dedicated hours days and weeks of

caring for her frostbite, assisting feeding and multiple surgeries, our veterinarians, involved, had to reference human frostbite case studies because this level of frostbite injury had not been documented in a reptile case that they could compare it to. They either suffer from life threatening injuries at these temperatures or die from exposure, responsible keepers are the people most likely to comply with permits while irresponsible keepers and animal dumpers usually ignore laws entirely. Transparency becomes at risk for fewer finds or confiscation by being kept honest about the animals they keep. Preventing them from seeking husbandry advice, veterinary care, or help when needed. We're concerned that permitting these animals will drive out the very community that funds grants use and educate the public. Ethical breeders produce wild caught demand through captive breeding and supplying. Reptile shops and breeders prioritize screening their customers through education, secure housing, and proper animal care. We respectfully urge the state to work with experienced keepers and businesses on a reasonable science-based solution rather than regulations that could unintendedly harm responsible owners and small local businesses. Laws and regulations should punish neglect abandonment and unsafe housing directly. Not create barriers for responsible reptile owners. Thank you.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Oral Comments from open hearing #4 Exhibit 98 – R.I. Importation and Possession Regulations

Taylor Faria- Good evening and thank you for your time. My name is Taylor Faria. I'm a reptile keeper and business owner and I own, co-own a reptile shop with Emily, and I'm here to oppose the proposal because the permitting process is unnecessarily complicated and will negatively affect responsible reptile owners, educators, and small businesses across Rhode Island. Many reptiles, including tegus, are used for educational programs that teach children and public about animal care, conservation, and responsible ownership. These animals help replace fear with understanding and responsible keepers play an important role in that education. The problem with these overly restrictive permitting processes is that it discourages responsible people from participating in the system at all. When permits become too expensive, which I know they're not in Rhode Island, but they are confusing and difficult to maintain people stop reaching out for guidance, they stop reaching out for veterinarian support and they stop coming to us for husbandry advice because they fear penalties or losing their animals. This creates the exact opposite of what these regulations are supposed to accomplish. It pushes ownership underground instead of encouraging responsible transparent care. Small businesses, breeders, and educators will be hurt by the paperwork that delays and the uncertainty that these regulations create. Responsible reptile keepers are not against regulation. We support practical standards for safe housing and responsible ownership, but this proposal creates barriers that many ordinary people and small businesses realistically cannot keep up with. I ask that you reconsider your restrictions and focus on a practical, workable regulation that encourages education, cooperation, and responsible care instead of pushing people away from the system. Thank you.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation

change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.

Oral Comments from open hearing #5 Exhibit 99 – R.I. Importation and Possession Regulations

Nelson Horton- Actually, I have a question if I may. I was with Kimberly, I was running late from work, so she actually read my prepared statement. I was just wondering if as somebody who lives in the state and has applied for the permits for other species, monitors in particular, the hoops were, I'm going to use the cliché, I had to jump through a lot of hoops only to be at the end denied anyway for reasons that they did not give. They just said no. Now I have had to give them proof of my enclosures, and I have basically zoo quality enclosure built in my basement ready for the animal I was trying to bring in. I had to keep the animal out of state even though I was purchasing it in state from a shop in the state. I had to move the animal out of state to get it vet checked from an out of state vet, to get it brought into the state to get it in state to get it in state vet checked and then keep it out of state until the permit process was done. It just seems like, and again these the people who have already spoken have said the same thing I'm saying, but from real life experience of trying to do this it's, it's over the top hard in Rhode Island to get a permit and I believe it was Scott Marshall was the person I had to deal with and I'm sorry what is your name sir?

You're the man I've been emailing, okay. I'm Nelson Portman. I'm with the New England Herpetological Society. We've been doing reptile education, grants, and processes like that for years and years and years. I'm just saying though from my personal experience it was very, very hard to try and get a permit and then only to be denied at the end for no real apparent reason. So if you're going to do this with tegus especially if theres not grandfathering in for the ones who are here how, how my question is basically say you find 50 tegus that come and apply for permits and you guys deny them and I say you guys but the state denies the permit process are you guys willing to or do you have the facility to house 50 tegus or are you just going to plan on euthanize tegus if they don't get the permit process and cant be relocated quickly enough or what if an existing keeper has the tegu, applies to the permit, sorry let me go back, if the existing keeper doesn't know about the permit process yet they haven't heard about any of this and for some reason police come to their house find a tegu is the tegu going to be confiscated instantly or are they going to be given the chance to apply for a permit these are just questions I dont know the answers to yet, and I feel like its for lack of a better term its kind of a knee jerk reaction to a single incident of whether it be a released or escaped tegu that's causing this and I just I don't want to see us go so far so fast that we loose the ability to keep an animal or another animal with the permit process that's just so hard to do in this state is basically where I'm coming from so that's all I really got to say.

DEM Response: DEM appreciates the outpouring of comments in support and opposition to the proposed tegu permitting process. Due to inconsistencies in regulations and lack of clarity about the permit process and depth of information needed, DEM has decided to postpone this regulation change and will seek to create a workshop regarding tegus and other exotic herpetofauna involved in the pet trade when the language in this regulation section can be fully evaluated and reexamined.

DEM Recommendation: Minor Change. The addition of tegus to lizards that require a permit will be removed.