



NEW ENGLAND BACKCOUNTRY HUNTERS AND ANGLERS

May 23, 2023

To: Ashley Schipritt, RI Department of Environmental Management

Re: BHA Comments on Hunting and Trapping Regulations (250-RICR-60-00-9)

Backcountry Hunters & Anglers (BHA) seeks to ensure North America's outdoor heritage of hunting and fishing in a natural setting. Our members advocate for access and opportunity to hunt and fish on public lands and science-based management of wildlife to ensure healthy fish and game populations persist on the landscape.

With these things in mind, we respectfully submit the following comments on the Department's proposed Hunting and Trapping Regulations for the 2023-2024 and 2024-2025 Seasons:

9.9 Cooperative Hunting Programs – Bristol Town Properties Cooperative

BHA supports the proposed changes in 9.9.4, which seek to secure new deer hunting opportunities in Bristol. Currently there is less public hunting land in the east bay than any other part of the state, and there is no public land open to deer hunting in Bristol County. In addition to providing new recreational hunting opportunities in an area of the state where relatively few currently exist, we're hopeful that opening the Bristol Town Properties Cooperative will also help address the disproportionately high rate of deer-vehicle collisions in the area.

BHA commends DEM's Fish and Wildlife staff for working to open new hunting opportunities, recognizing that doing so required working with municipal officials to negotiate entry into DEM's co-op hunting program. We urge DEM's Fish and Wildlife staff to continue working to identify areas where publicly-accessible hunting is compatible, and even beneficial, and continuing to expand the lands accessible to hunters through the co-op program.

9.10 Migratory Game Birds

BHA supports the proposed changes in 9.10 B, which seek to expand the hours for all segments of the dove hunting season to 30 minutes prior to sunrise to sunset. The change would bring the shooting hours for doves in line with virtually all other species of migratory game birds that have open seasons in Rhode Island, and provides additional opportunities for hunters to pursue doves.

9.16 Management Areas

BHA supports the proposed changes in 9.16 N 2, which seek to provide a regulatory framework for the Department to utilize South Shore Management Area for state-sponsored hunter recruitment events. For the last several years BHA has supported mentoring events organized by DEM, and through participation in these events we have seen what is possible in Rhode Island with respect to bringing new hunters into the field. We agree that there is both a need to provide assistance to those interested in hunting, as well a

sufficient abundance of opportunities to hunt on Rhode Island's public lands to accommodate incoming hunters.

9.7 Deer / 9.6 Definitions

BHA doesn't currently have a position on the legalization of dog tracking in Rhode Island (9.7 N). Further, because the proposed regulation is not intended to change the way that the use of night vision and/or drones are regulated in Rhode Island our comments do not convey a position on either issue, although should changes be proposed on these issues at a future date we would almost certainly weigh in.

As currently written, we are concerned that the proposed changes, which involve defining of the recovery of deer as not a "deer hunting activity" (9.6 A. 15), may affect activities other than dog tracking. Specifically, we are concerned that if the recovery of deer is no longer considered a hunting activity under the regulation than other activities currently prohibited while hunting, such as the use of night vision (9.7.2 G) or drones (9.17 M), would no longer be clearly prohibited while tracking and/or recovering deer. In simple terms, we believe that DEM's intent in proposing changes to 9.6 A. 15 is to legalize *only* the tracking and recovery of deer using dogs within the terms of the 9.7 N, and that existing prohibitions on certain activities while hunting remain in effect, including while tracking and recovering deer.

As a result, we urge the Department to clarify its intent by including the following amendments:

9.7.2 Prohibited Activities

G. The use or possession of laser sights that project a beam or night visions equipment while hunting is prohibited, ***including for the recovery and/or tracking of deer.***

9.17 General

M. The use of drones or other remotely operated unmanned aircraft systems and devices to drive or disturb wildlife or aid in the take of wildlife for the purpose of hunting is prohibited, ***including for the recovery and/or tracking of wildlife***

We believe these changes to be minor clarifications rather than substantive alterations that would require an additional hearing.

Thank you for your consideration of our comments and recommendations.

Sincerely,

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