

F. Appendix VI: Public Comments

Below is a summary of the public comments received during and shortly after the public review period from September 21, 2005 through January 15, 2006. **The comments refer to the NJ Wildlife Action Plan draft that was posted online September 21, 2005.** Comments were reviewed and where appropriate, were incorporated into the NJ Wildlife Action Plan (dated July 26, 2006). The comments have been organized by topic.

A. Trap, Neuter, Release Program & Feral Cats

No.	Comment
1	Department of Health and Senior Services (DHSS), Office of Animal Welfare has jurisdiction over feral cats...not Department of Environmental Protection (DEP) (Statute: NJSA 8:23A-1.10).
2	Statute (NJSA 8:23A-1.10) also requires trap and containment for seven days in a shelter...if the NJ Division of Fish and Wildlife (DFW) approves "trap & kill" method, DFW will incur a great cost as they will have to abide by this statute.
3	DHSS should be included as partners in Trap, Neuter, Release Program (TNR) and feral cat issues including public outreach.
4	DEP supports TNR.
5	Opposes NJ Wildlife Action Plan (Plan) on issues of being anti-TNR...wants all references to such removed from the Plan.
6	Opposes Plan on issue of banning the feeding of feral cat colonies.
7	Opposes Plan on issue of banning the TNR programs.
8	Opposes Plan on issue of supporting trap and kill programs.
9	Opposes any anti-feral cat colony statements, goals, and actions.
10	TNR works if developed properly & includes sterilization of feral cat colonies.
11	The DFW should assist TNR managers.
12	The state should create mandatory spay/neuter programs.
13	State needs improved enforcement of current abandonment laws.
14	Target TNR in urban areas or less "wildlife sensitive" areas.
15	The Plan and DFW should advocate private and non-profit financial support for TNR programs.
16	State needs to improve funds for spay/ neuter assistance program.
17	Improve the "low cost" spay-neuter assistance program to focus the limited funds on NJ residence receiving public assistance (food stamps, Medicaid, rental assistance, etc.) and/or to feral cat colony managers & caretakers.
18	Change the potential partners in the Plan to include DHSS, Animal Protection Institute, Stray Catz, Inc., and shelters.

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Trap, Neuter, Release Program & Feral Cats (cont'd)

No.	Comment
19	Plan identifies American Bird Conservancy, Cat Indoors, and NJ Audubon Society as partners regarding feral cat issues & outreach, but none of these are considered experts in the field re: feral cats and this presents a skewed view of the feral cat issue. [We] recommend partnership with DHSS' Office of Animal Welfare (OAW) and believe this would be the most effective partnership as OAW meets w/ organizations on "both sides" of the issue.
20	Recruit volunteers to assist in managing feral cat colonies.
21	"Cat sanctuaries" are not plausible and are deemed inhumane.
22	Public outreach must be a collaborative partnership & effort between DFW, shelters, rescue centers, & other feline-related organizations.
23	Feral cats vs. free-roaming pet cats cannot be distinguished...pets will be killed.
24	Tax credits should be given to cat sanctuaries & barn cat owners who spay/ neuter & care for their cats.
25	Encourage the adoption of feral cats when they can be domesticated.
26	In extreme cases, encourage & provide infrastructure to transport feral cats to a sanctuary or barn.
27	Page 16 of the Plan, the statement "Free-roaming house cats kill millions..." is about the nation...the Plan should identify a figure that refers to NJ only and specifically with regards to the number of species of conservation concern that are killed. Please revise as such.
28	The Plan does not provide any literature citations that support the argument that free-roaming cats kill "millions of birds, small mammals and reptiles each year in the United States" as stated in the Plan. Studies that have been conducted used small study sets in isolated areas and then applied the results across the town, state, country, etc.
29	There is a partnership between the NJ Audubon Society (NJAS) and Burlington County Feral Cats Initiative to develop a model within the county for the successes of the TNR program and feral cat colony management. Why can't this be done throughout the state or at least allow counties/ municipalities to make decisions?
30	Traps used today (leg holds, conibears, and snares) are inhumane and kill non-target (including endangered and threatened) species.
31	Hunting of feral cats is cruel and an ineffective means of controlling their populations.

B. Hunting

No.	Comment
1	Pro-immunocontraception; should include on-going research and evaluation of immuno-contraceptive drugs for deer and bears.
2	Deer are not to blame for forest understory growth & destruction, exotic Plants are the problem and deer can help reduce their presence.
3	Hunting disturbs the natural balance of the deer herd, the stability by not permitting natural selection to function appropriately.
4	"...no reason for [hunting] other than beastiality."
5	Deer are not overabundant especially in view of bobcat and coyote presence...along with reputed mountain lions. If we stop killing the predators (coyotes and bobcats), they'll help control the deer population.

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Hunting (cont'd)

No.	Comment
6	Public education promoting hunting “for the better” of our wildlife and natural communities is unethical. Hunting is a personal choice and should not be “pushed” onto NJ citizens.
7	General opposition to any increased hunting opportunities.
8	“Serious consideration should be given to Sunday hunting (like in NY).”

C. Legal Off-road Vehicle (ORV) riding areas

No.	Comment
1	There is no proof that the establishment of “legal riding areas” will reduce illegal off-road use. Emile DeVito (NJ Conservation Foundation) once stated that the legal ORV riders are not the same people as the illegal set of riders and that without a mandatory creation of “point of sale registration and license plates for all ORV’s, money for law enforcement, and new rules...[legal riding areas] will have little or no effect on alleviating environmental damage from ORV use on conservation lands.”
2	Page 27 of the Plan: line 5, “Provide areas where off-road vehicle recreation is permitted...” and line 31, “Conduct surveys of ORV users...to determine their level of satisfaction...” are activities that should be conducted by the private industry and not by those focusing on habitat and wildlife conservation.
3	Page 27 of the Plan: line 37, “...Scenarios for siting ORV parks must be investigated to develop the least disruptive and destructive areas for residents...” will do little to accomplish the primary mission of wildlife protection.

D. Goals and Implementation

No.	Comment
1	Love the Plan...wants the DEP and DFW to “take it to the next level” by setting wildlife population goals and habitat acreage goals per region. For example, in the Skylands, 1) create 5000 acres of managed grassland, 2) support nesting population of 200 pairs of kestrels, 3) support a nesting population of 1,000 grasshopper sparrows, 4) maintain 3,000 acres of scrub-shrub habitat, 5) maintain 10,000 acres of early successional forest, 6) support 500 nesting pair of golden-winged warblers, and 7) support 1,000 pairs of ruffed grouse.

E. Forestry

No.	Comment
1	Please add foresters to the list of potential partners to deliver conservation.
2	Silviculture does not contribute to forest fragmentation.
3	Forest service and NJ Foresters Association should participate and the Plan should include active woodland harvest. The Plan ignores ongoing tree farming and forestry practices of the region.
4	The Plan is “full of potential restrictions to landowners, but is bereft of specific compensation recommendations. [The Plan] should require direct (personal) notification of individual landowners directly impacted.”

(Appendix VI continued)

F. Miscellaneous

No.	Comment
1	The Plan should include the evaluation of the impacts of communication towers & buildings with artificial lighting as potential problems for migrating birds (and/or bats) through increasing collisions and confusion.
2	The Plan should identify poisons/ chemicals that negatively affect wildlife and deter usage of these chemicals (i.e. anticoagulant rodenticides).
3	The extended public comment period of Dec. 31, 2005, was not enough time to review the Plan and as such the NJ Animal Rights Alliance (NJARA) “reserves the right to challenge the actions of the DEP in connection with the preparation, publication, and adoption of the” Plan.
4	Page 19 of the Plan: lines 27-29 & 32-34, states that the clearing of upland vegetation around wetlands is a threat due to increased runoff, higher temperatures, etc. [We] feel that this activity is more directly related to the threat on the wildlife inhabiting this area. NJ needs stronger regulations protecting the vegetative buffer around wetlands to protect waterways and wetlands and for upland habitats.
5	DEP should dedicate staff and funds to urban/ suburban comprehensive surveys to fill in data gaps. These gaps present problems especially when policies and regulations are created or enforced using the Landscape Map.
6	The Plan does not provide goals and strategies focused on plan development for coordinated response to events threatening habitat and species (i.e. oil spill response, coastal storms, flood tides, fires, etc.). There are no partnerships with animal rehabilitators nor plans to evacuate endangered animals from such facilities during emergencies.
7	Under the goal to “Protect...unique habitats...” – please add North Jersey District Water Supply Commission to an area where natural communities will be mapped in a cooperative fashion.
8	“...a thorough consistency and funding analysis should be done and provided with the Plan to all stakeholders.”
9	The background data and methodology supporting the GIS mapping determination of habitat speculated by the Plan should be thoroughly detailed and undergo independent confirmation for conclusions by neutral third party peers.
10	The Plan should require public approval for implementation where restrictions on land use will result.
11	The Plan should include partnerships with Quail Unlimited and farmers to manage and create lands for quail and other native species.
12	The Plan should include the evaluation of the benefits of beaver activities and the use of humane non-lethal means of mitigating conflicts where dams pose a risk to human structures.
13	Increase differential dog license from \$3 to \$25 to deter owners from not neutering their dogs.