

THE WILDLIFE SOCIETY

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8 June 2010

Larry Herrighty
CBBMP
Division of Fish and Wildlife
Department of Environmental Protection
PO Box 400
Trenton, NJ 08625-0400

Dear Mr. Herrighty:

The Wildlife Society appreciates the opportunity to submit comments in favor of the Comprehensive Black Bear Management Policy prepared by the New Jersey Fish and Game Council. The Wildlife Society (TWS) was founded in 1937 and is a non-profit scientific and educational association of over 9,100 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve wildlife professionals—the scientists, technicians, and practitioners actively working to study, manage, and conserve native and desired non-native wildlife and their habitats worldwide.

TWS urges you to implement the Comprehensive Black Bear Management Policy, which is a well-documented plan supported by sound science on the dynamics of the state's bear population. Monitoring by the Division of Fish and Wildlife over the past thirty years has established that New Jersey's black bear population is increasing with robust reproductive and survival rates. The New Jersey bear management policy calls for an integrated strategy of public hunting to reduce and then sustain the bear population and non-lethal techniques, such as an education campaign for residents. Both tactics are necessary to manage New Jersey's bear population; neither of these approaches will work on their own.

TWS endorses hunting as a legitimate and fundamental part of sound wildlife management. New Jersey's plan appropriately calls for regulated public hunting as one method of controlling its black bear population, and The Wildlife Society supports strongly this approach. Hunting has many social and ecological values, including recreation, subsistence, heritage, use of a natural resource to benefit people, and control of overabundant wildlife. Professional wildlife biologists are charged with the responsibility of managing wildlife populations in a scientific, sustainable, and socially acceptable manner. Regulated public hunting, when based on sound science-based information, can be used effectively to help meet this responsibility. The license fees, stamps, permits, and excise taxes paid for by hunters provide the major source of financing for habitat acquisition and improvement, research, and management programs for all wildlife, game and non-game.

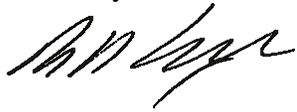
The Wildlife Society also supports wildlife fertility control, in situations where its use is appropriate and effective. However, fertility control and sterilization, by themselves, are not

effective methods for controlling New Jersey's black bear population, from either an efficacy or cost-efficiency standpoint. Thus far, it has not been demonstrated that fertility control will effectively control New Jersey's black bear population and so it is rightfully excluded from the management policy.

Finally, we encourage the Department of Environmental Protection to take the Council's recommendation and work with legislators to amend the state's feeding ban to clarify that all intentional and unintentional feeding of bears is prohibited. The Wildlife Society recognizes the potential problems associated with feeding wildlife, either intentionally or unintentionally, and supports New Jersey's 2003 ban on feeding bears.

The Wildlife Society urges you to follow the advice of the professional biologists within the Department of Environmental Protection's Division of Fish and Wildlife and implement the bear management policy as proposed. Thank you for considering the views of wildlife professionals.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Leopold", written in a cursive style.

Bruce D. Leopold, Ph.D.
President