



THE LEAGUE  
OF  
HUMANE VOTERS®  
*of New Jersey*

POLITICAL ACTION FOR ANIMALS

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The League of Humane Voters of New Jersey (LOHVNJ) object to the New Jersey Forestry Task Force framework and object to the process by which the framework was adopted.

In general, the framework is overly vague and leaves too much discretion for a "scientific advisory panel." The framework's vagueness (such as planning based on "sound science and data") allows for almost any kind of forest policy. Science is not policy. Science can be used to say cutting down a percentage of trees will not endanger the survival of any species, but science says nothing about whether cutting down trees is desirable as a matter of policy. A scientist from a logging company will have very different positions from a scientist from an environmental NGO.

The framework's reliance on public comments in the rulemaking process under the Administrative Procedures Act to counter any proposed regulations that go against public policy is misplaced. The NJDEP has a known history of adopting regulations despite overwhelming public opposition, and challenging such adoptions in court is extremely difficult, given the deference that the court gives to state agencies.

Allowing the sale of wood, for profit, under certain circumstances (Recommendation 15) creates an incentive to cut trees and remove wood when there would otherwise be no incentive. Since there is no ecological reason to remove wood, allowing the sale of wood for profit should not be in the framework at all. If a fallen tree is blocking a road or threatening power lines, it can be moved back into the forest.

Increasing funding to the NJDEP is premature when the policies have not even been developed yet. The statement "all recommendations discussed above require funding" is simply untrue when some recommendations are so vague and some recommendations (i.e. cessation of deer feeding plots on state lands) require no funding.

We also object to prescribed burns, which create the edge habitat that is preferred by deer. While APLNJ and LOHVNJ believe that deer have been unfairly blamed for eating leaves and saplings while developers and loggers continue to clearcut vast swaths of forest for more residential and commercial development, we object to practices that increase the deer population.

Furthermore, regarding deer, the NJDEP has been managing state wildlife management areas for decades to increase the deer herd and grow trophy bucks through practices like prescribed burns and clearcutting

(to create edge habitat), food plots for deer and farm leases that require farmers to leave crops standing for deer. The NJDEP even partners with private hunting clubs to plant food plots for deer, and then gives awards to the hunters who kill the biggest bucks with the biggest racks. Allowing the sale or donation of venison has nothing to do with reducing the deer herd when the NJDEP keeps the deer herd artificially abundant for hunters. As a side note, such meat is not inspected by the USDA and may be unsafe, and staff at one food bank has told us they have no interest in venison donations from hunters.

APLNJ and LOHVNJ also object to the statement, "None of the recommendations are intended to interfere with current approved forest management plans and their associated activities." The state should be reassessing their forest management plans and there is no reason to wait for those plans to expire before adopting new plans that will fight climate change, sequester carbon, protect trees, and preserve wildlife habitat.

APLNJ and LOHVNJ also object to the process by which the framework was approved. While task force members were allowed to submit proposals, we were not allowed to communicate with each other and were not allowed to author any part of the framework.

The entire framework was written by the four co-chairs. Communication was always through the co-chairs, and the co-chairs decided which proposals would be included in the framework or even discussed at meetings. Task force members were prohibited from emailing all other members, and chat among members was disabled during the Zoom calls, so the discussion was under the co-chairs' complete control. When a member was allowed to present their proposal to the entire task force, there was no vote on the proposals. The co-chairs decided in what way, if at all, a proposal would be included in the framework. Because members were not allowed to communicate with each other and the co-chairs authored the entire framework, this framework does not represent the views of the task force members. Lastly, the task force presented unrealistic deadlines for submitting proposals and for commenting on the final framework. Proposals were originally due June 30, 2022 and representatives of several organizations pointed out that there was not enough time to obtain approvals from their organizations, so the deadline was pushed back to July 5: a 5-day extension over a 3-day holiday weekend. One of the co-chairs even joked that task force members should spend their holiday weekends writing proposals.

Similarly, the voting process is completely opaque and unjust. Task force members were told that the votes of organizations will count more than the votes of individuals, which is fair, but some organizations were given more votes than others, based on an unfair assessment of whether an organization's members count as "members."

And now, task force members are being required to submit their views on the final proposed framework during the last two weeks of December. For many organizations, this requires getting board approval. We suspect that we are not the only members to be spending our holidays and family gatherings writing, discussing, and approving our positions in order to meet the task force's unrealistic deadlines. The task force deadlines have had the effect of minimizing proposals and minimizing dissenting opinions, appearing to intentionally make it extraordinarily difficult to do anything more than say, "We agree."

Prepared by Doris Lin, LOHVNJ NJ Forest Task Force representative.