



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION FISH & WILDLIFE

OFFICE OF THE ASSISTANT COMMISSIONER

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To: Dawn M. Mount, Municipal Clerk, Princeton

Through: Jim Oxley, NJDEP Fish and Wildlife

From: Jodi Powers, NJDEP Fish and Wildlife

Date: August 12, 2025

Subject: Application for a Permit to Inhibit Wildlife Reproduction

NJDEP Fish & Wildlife (NJFW) is in receipt of Princeton's application for a Permit to Inhibit Wildlife Reproduction (PIWR). NJFW accepts your offer to meet in Princeton; a site visit of the proposed sterilization areas would be very helpful. NJFW wants to remind Princeton that per 7:25-5.32(d)5 and 7:25-5.37, a PIWR is an addition to a Community Based Deer Management Program (CBDMP) permit and cannot be issued alone. NJFW anticipates that Princeton will apply for a CBDMP. In the interim, NJFW has reviewed the PIWR application and is notifying you of several items that require edits, clarifications and/or additional information. Kindly address the following concerns and comments:

Below are items that require revisions for the application to be forwarded to the Fish and Game Council:

- 1) A Community Based Deer Management Program permit requires that written consent from any affected private landowner is obtained if access to private property is required to implement the plan. Please provide any written consent obtained from private property owners and a detailed plan on how consent will be obtained if it has not been secured at the time of application.
- 2) Page 13 of the application states, "Given these significant differences in projectile performance, a safety setback requirement is not warranted." The Fish and Game Council has determined that a 450ft safety buffer is warranted. Future revisions of the application should reflect this requirement.
- 3) Page 5 of the application states, "DVCs in Princeton rose sharply as of July 2024 compared to 2023". Please provide DVC data for that period.
- 4) Page 6 of the application states, "...objective is to sterilize >95% of female deer in accessible areas". Please define the "accessible areas" with reference to the study areas with details on how this would affect study area sterilization rates.

Below are items that would be helpful for NJDEP Fish & Wildlife to present a clear picture to the Fish & Game Council:

- 1) In discussing potential links between fertility control and DVCs, you cite Staten Island as an example. Please provide DVC data from Staten Island, including three years prior to the initiation of the sterilization project up to the most recent available year for our reference. Please include a brief description of the data acquisition process for these years.
- 2) Page 10 of the application states, “darting and euthanasia is another option for deer management, it creates several challenges which preclude consideration for this research proposal. One issue is the need to properly dispose of carcasses, which can be logistically complex”. This option needs to be investigated more thoroughly. Disposal of deer under a CBDMP is determined under 7:25-5.32(b)11 and 7:25-5.32 (d)8. Disposal of a deer that has been darted and euthanized is no more difficult than field dressing and transporting to a butcher.
- 3) We suggest a survey of residents in the research areas. This will give all parties more information and something tangible the Fish and Game Council can consider. The survey answers could also serve as permission if stipulated clearly in the survey. Services like ESRI Survey123 would facilitate a simple digital survey that could automatically map the properties who responded and map specific responses to questions (i.e. all property owners who responded yes for access for darting show as green on the map, etc.).

For example:

- Their address (so the results can be mapped upon receipt)
- Do they support
 - deer management in their neighborhood
 - capture and euthanasia
 - capture, sterilize, and release
- Do they grant permission for White Buffalo to dart from the roadways within 450ft of their properties
- Do they grant permission for White Buffalo to retrieve anesthetized deer from their property

