



MICHIGAN AUDUBON

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TO: Michigan DNR Wildlife Division
ATTN: Ben Luukkonen, LuukkonenB@michigan.gov
FROM: Michigan Audubon
RE: Review of Draft Common Merganser Control Policy and Procedures
DATE: November 6, 2017

MDNR Wildlife Division,

We have reviewed the draft Common Merganser Control Policy and Procedures dated 10/26/2017. After careful review, on behalf of Michigan Audubon and the wildlife management tools and expertise available to us, we submit our comments on the draft below:

While Michigan Audubon recognizes that Swimmer's Itch is a concern for recreational users on inland lakes, we feel **the lethal take of Common Mergansers is an unbalanced response to this issue of human discomfort or inconvenience, especially when effective non-lethal methods of Common Merganser management are available.**

Non-lethal capture and relocation is scientifically proven to reduce local snail infection rates while preserving the Common Merganser population. The Control Policy and Procedures discourages the use of this effective method by:

- 1) offering lethal control as an option;
- 2) requiring comparatively few restrictions for lethal take methods as compared to Capture, Transportation, and Relocation; and
- 3) pricing the permit fee for capture and relocation higher than that of other methods, including lethal harassment and nest and egg destruction.

The lethal take of a migratory bird should be one of last resort, especially when proven, non-lethal solutions are available. This Policy passively encourages the lethal take of Common Mergansers by making non-lethal methods available, more expensive, and more restrictive.

Further, there are many other anthropogenic factors that likely create productive conditions for the Swimmer's Itch cycle including agricultural and residential runoff, herbicide and pesticide use, removal of natural shoreline vegetation, invasive aquatic species, etc. **These unnatural inputs and modifications are reducing the quality of Michigan's inland lakes for people and wildlife; we hope these issues are also being addressed as part of a multifaceted solution to combat Swimmer's Itch.**

Michigan Audubon is dedicated to the protection of Michigan's native waterfowl and maintains that the lethal take of Common Mergansers to control Swimmer's Itch is unnecessary because effective, non-lethal capture and release methods will increase recreational enjoyment for all inland lake users. Common Mergansers, although a game species, are a protected migratory species that many lake residents enjoy and wish to preserve. **Michigan Audubon strongly encourages the DNR to remove all lethal take methods from this Policy and limit control methods to non-lethal only.**

As a conservation stakeholder in our state, we are able and willing to be involved further on this matter and encourage you to contact us at (517) 580-7364 if Michigan Audubon, our Research Advisory Council, or conservation staff can be of assistance in ensuring a suitable, non-lethal management plan is in place for the Common Merganser.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather", with a stylized flourish at the end.

Heather L. Good
Executive Director

**Connecting birds and people for the benefit of both
through conservation, education, and research efforts in the state of Michigan.**