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July 11, 2012

Dr. Russ Mason  
Chief  
Department of Natural Resources  
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*Sent via electronic transmission*

Dear Dr. Mason:

On behalf of The Humane Society of the United States (HSUS) and our 415,000 Michigan members, and Karen Stamper, and the members of the Michigan Save Our Swans Committee, I thank you for our recent meeting on the status and management of free ranging mute swans in the state of Michigan. We appreciated the opportunity to present our proposal to you, and at your request, I am summarizing the points we made in our meeting and detailing the resultant proposal via this letter.

Initially I should note that The HSUS is pleased to enter into this dialog with the Michigan Department of Natural Resources (DNR) over the proper and sustained management of free ranging naturalized mute swans in Michigan. We have worked together with Michigan DNR for many years on similar management issues and a cooperative management program with respect to (resident) Canada geese in Michigan. We are certain that the lessons we have learned and the cooperative approach that our two agencies have taken will be beneficial to developing a comprehensive and humane management program for naturalized mute swans in Michigan.

As you know, many residents of Michigan are justly furious over the recent killings of numerous naturalized free-ranging mute swans. Indeed, they have been as upset by the callous and brutal nature of the killings as they are with the apparent procedural inadequacies and lack of adequate public notice and involvement that has accompanied issuance of swan killing permits in local districts. In addition, another complicating factor is the semi-owned status that some of these birds have in more heavily urbanized waters. Moreover, there are

significant biological questions regarding the justifications which have been put forth by DNR personnel to justify the killing of these magnificent birds. All of these matters need to be thoroughly addressed in the preparation of a comprehensive plan.

In that light and with that background, we have assiduously examined all of the documents we could acquire describing, explaining and justifying the so called Mute Swan "Conservation Order", as embellished by the Mute Swan Management and Control Program Policy and Procedures document (hereinafter "Program Policy document"). Neither document provides more than summary assertions as to the presumably negative activities or behaviors attributed to free-ranging mute swans that could justify killing individual swans, much less the wholesale destruction of 10's of thousands envisioned in the Order or Program Policy. Indeed, there are no supporting data or case studies that suggest the need for mass killing. There are no benchmarks or baseline data against which to measure results, and there seem to be no concrete objectives short of unjustified lethal population reduction. Taken together the two documents are not a professional management plan at all—they are just a blueprint for large scale killing of mute swans.

We are also particularly concerned that Program Policy document sets an arbitrary and unjustified numerical population goal for mute swans. In our experience, it is not practical or prudent to establish a specific population threshold number at which to attempt to manage the mute swan population. More detailed and costly survey protocols would need to be developed and it would be difficult to put in context the environmental impacts or lack thereof of local mute swan populations relative to a single specified statewide population number. The requisite removal of "excess" swans exceeding a specific population number could become an expensive, undesirable annual management practice that would result in more swans being euthanized in the long term. Also, once swan numbers exceeded a designated threshold, controversial decisions would need to be made on which swans are removed from the population. It is, we believe, far more prudent and biologically defensible to adopt an impact based approach to dealing with alleged problems caused by mute swans whereby potential problems are reported, evaluated and, if verified, solved using the most humane and least harmful methodology available.

Moreover, there is no mention of the responsibilities and duties that DNR has to manage mute swans for the benefit of Michigan's citizens. DNR has responsibility for managing all wild animals in the State whether migratory or resident and whether native or introduced, and all are the property of the people of the State. There are more than 35,000 lakes and ponds in Michigan and the DNR plan suggests that 2000 to 3000 swans would remain at the end of the proposed 18-year population reduction. Yet there is no suggestion as to where swans would remain and how stewardship and proper management would be provided. In short, any plan for addressing the issue of free-ranging mute swans in Michigan should recognize that mute swans have high aesthetic value and provide public enjoyment which needs to be considered and accommodated to the extent feasible in the context of DNR's broader resource management and environmental responsibilities.

Finally, there are no mechanisms for involving concerned citizens in non-lethal and humane solutions to perceived problems that may be attributed to free-ranging and naturalized mute swans. Our experience shows that this could be a critical component of garnering citizen support

and cooperation, and is a necessary part of an integrated and publicly supported management plan.

Combining the above concerns and elements into a proposal, as you requested, we propose as a starting point:

1. That Michigan DNR immediately suspend the Wildlife Division Mute Swan Management and Control Program Policy and Procedures and associated Conservation Order and begin immediately to revise and update the document, because (as suggested herein) revision is critically needed now. Such immediate revision is contemplated at the top of page 2 of the Program Policy.
2. That Michigan DNR immediately appoint local mute swan advisory committees and a statewide mute swan advisory committee, consisting of Michigan Humane Society, the Michigan Save Our Swans Committee and The Humane Society of the United States, among others, to advise on non-lethal management options, and liaise with DNR personnel in development of a Comprehensive Mute Swan Stewardship and Management Plan. We propose that the current Program Policy document be replaced with a balanced Comprehensive Mute Swan Stewardship and Management Plan that would deal comprehensively with the challenges and benefits surrounding free-ranging naturalized mute swans in Michigan.
3. That Michigan DNR declare a voluntary moratorium on the lethal control of free-ranging mute swans except in emergency situations, that would last at least until a Comprehensive Mute Swan Stewardship and Management Plan is completed.

With that as an initial draft proposal, we suggest that specific management objectives could include:

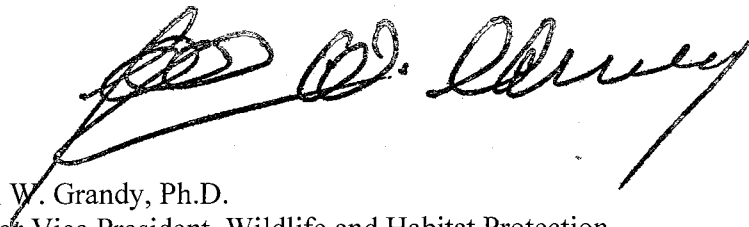
- Educate the public and increase the public's awareness of mute swans to include their aesthetic value; and potential negative impacts on aquatic and wetland ecosystems, vulnerable species of wildlife, and public safety and private property. Increase public recognition, enjoyment and appreciation of mute swans and natural wetland habitats, and provide enlightened stewardship for both.
- Manage the population of free-ranging mute swans in Michigan to minimize negative ecological impacts to relatively natural aquatic and wetland habitats and vulnerable water birds and other wildlife species. Use non-lethal controls to achieve management goals wherever possible.
- Manage mute swan population growth and range expansion in suburbanized habitat and lakes and ponds with adjacent human habitation in association and cooperation with the local adjacent human population.

- Implement all mute swan management options with consideration for public perceptions and sensitivities to mute swan management and for ecological goals and conditions.

By its charter, The Michigan Department of Natural Resources is committed to the conservation, protection, management, use and enjoyment of the state's natural and cultural resources for current and future generations. Proper stewardship by a wildlife resource agency to fulfill this mission requires that a beautiful and treasured natural resource like the mute swan be managed for and consistent with the health of Michigan's ecosystems and that any negative impacts from such a species be managed as humanely as possible and on a case by case basis. We have appreciated the opportunity to prepare this draft proposal for your consideration to help meet those goals. We are mindful of the success we have had working with DNR to alleviate problems with resident Canada goose management and we look forward to working with you to duplicate that cooperative success and achieve a true Comprehensive Plan that meets the needs of Michigan's natural resources and naturalized free-ranging swans.

We are prepared to meet with you and members of your staff as soon as practicable to advance this process.

Sincerely,



John W. Grandy, Ph.D.  
Senior Vice President, Wildlife and Habitat Protection  
The Humane Society of the United States

cc: Governor Richard Snyder  
Keith Creagh, Director, Michigan Department of Natural Resources  
Senator Carl Levin  
Senator Debbie Stabenow  
Interested Members of the Michigan Legislature  
Interested Press  
Karen Stamper, Michigan Save Our Swans Committee  
Linda Reider, Michigan Humane Society  
Jill Fritz, Michigan State Director, The Humane Society of the United States  
Barbara Avers, Michigan DNR, Waterfowl and Wetland Biologist  
Help Our Waterfowl  
Interested Parties