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January 14, 2020

Representative Gary Howell  
Chair, Natural Resources and Outdoor Recreation Committee  
Michigan House of Representatives

Via email to Amy Rostkowycz, Committee Clerk, [arostkowycz@house.mi.gov](mailto:arostkowycz@house.mi.gov)

**Re: Opposition to HR 154, House Natural Resources Committee Meeting, January 14, 2020**

Dear Rep. Howell and Committee Members:

Thank you for the opportunity to provide information to the committee. Attorneys for Animals, Inc. (AFA) is a Michigan non-profit and 501(c)(3) organization of legal professionals and animal advocates. Our **Board of Directors voted to oppose HR 154.**

This resolution calls upon the National Park Service (NPS) to establish a moose tag lottery hunt to assist in controlling the moose population on Isle Royale.

The resolution makes no mention of the NPS June 2018 Final Environmental Impact Statement to Address the Presence of Wolves<sup>i</sup>, a thorough and in-depth study that not only considers wolves, but also the overall ecological balance of Isle Royale.

The NPS does not deny concerns about moose overpopulation and resultant risks to vegetation.<sup>ii</sup> However, the agency has considered – and clearly rejected – a moose tag lottery hunt as a solution, concluding: **“Public hunting would be inconsistent with existing laws, policies, and regulations for the park because public hunting is not allowed by federal statutory law at the park”<sup>iii</sup>** (emphasis added).

It is important that this committee and all other legislators who consider the resolution, be aware that the NPS has dismissed the suggestion. We urge this committee to not report the resolution.

Very truly yours,

Beatrice M. Friedlander, JD  
Board President

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<sup>i</sup> <https://parkplanning.nps.gov/document.cfm?parkID=140&projectID=59316&documentID=86353>

<sup>ii</sup> EIS, *supra* at page 29 of 234, “in the absence of predation, an overabundance of moose could result in more dramatic swings in the moose population and change moose population demographics, and alter forest/vegetation community successional trajectories.”

<sup>iii</sup> EIS, *supra* at page 208 of 234:

“Commenters suggested establishing a public hunt to manage the island’s moose population and restore ecosystem balance. Commenters felt that harvested meat could be donated, profits of the public hunt could be cycled into the park and other public programs, and community and political participation and investment could increase. The public hunt could include a lottery for hunting tags, bow hunts, the use of hunting guides, and could support a humane method of culling moose. (Concern ID 59542)

Response: A dismissal of managed culling or public hunting is included in chapter 2 of the final EIS. Public hunting would be inconsistent with existing laws, policies, and regulations for the park because public hunting is not allowed by federal statutory law at the park. Also, a managed moose cull would not meet the purpose of and need for the plan and is outside the scope of this plan.”