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October 10, 2017

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

Hand Delivered; and via email: Joy Brewer, Committee Clerk, joybrewer@house.mi.gov

Re: Opposition to SB 316, House Natural Resources Committee Meeting, October 11, 2017

Dear Representative 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. The organization's Board of Directors voted to **oppose SB 316**.

The bill would repeal MCL 324.45501, a part of the Natural Resources and Environmental Protection Act which sets minimal protections for frogs and which has been in place for nearly 90 years. Without these protections (which prevent year-round hunting of frogs and hunting them using artificial lights), more expansive hunting regulations are likely. This is unwise based on current science (as stated in the letter submitted on this bill when it was being considered by the Senate, by the Detroit Zoological Society, which is included below) and on policy. Importantly, **it would subject more frogs to a painful and slow death.**

By repealing MCL 324.45501, the legislature abdicates its authority to set minimal standards for hunting frogs, and turns over full power to the NRC. The legislature represents the entire population of Michigan—those who care about wildlife and those who don't; those who hunt and those who don't; those who oppose the consumptive use of wildlife and those who believe it is the centerpiece of wildlife management. The Natural Resources Commission, on the other hand, represents a much smaller constituency within the Michigan population.

If SB 316 becomes law, the NRC through the DNR is free to consider revising the regulations (and likely will, given the DNR's testimony in support at the Senate Natural Resources Committee hearing, May 17, 2017¹).

However, there simply is not enough data on current frog populations to justify expanding the hunting of frogs.

¹ http://www.senate.michigan.gov/committees/files/2017-scm-nat_-05-17-1.pdf

ATTACHMENT A

The Detroit Zoological Society (DZS) urges voting *against SB316*, which, by repealing Section 45501 of Michigan's Natural Resources and Environmental Protection Act, would allow hunting of frogs year-round and allow hunting of frogs with the use of a spear ("gigging") and an artificial light. DZS created the world's first institution devoted specifically to the conservation of amphibians, the National Amphibian Conservation Center. It is a leader in global amphibian conservation, and is highly and uniquely qualified to comment on the conservation and management of amphibians.

Amphibian populations all over the globe are declining in the face of what is widely called an amphibian extinction crisis. Amphibian populations need protection in order to prevent irreversible population decreases. The current Michigan Natural Resources and Environmental Protection Act, Section 45501, states that frogs cannot be hunted from November 16th through late spring. This protects frogs during their breeding cycle. Stripping this protection could result in devastation of Michigan's frog populations as a result of hunting of breeding adults.

In addition to preventing hunting of frogs during their breeding cycle, the current Section 45501 of the Michigan Natural Resources and Environmental Protection Act prohibits the hunting of frogs using a spear ("gigging") with the aid of an artificial light. Studies have shown that frogs feel pain, and that death in this manner is incredible slow and agonizing. While a frog may appear dead, it often takes many hours to actually die from spearing. It is important that protections against this inhumane practice remain in place in Michigan state wildlife policy.

DZS feels strongly that SB316 would repeal protections for frogs, put in place by Section 45501 of Michigan's Natural Resources and Environmental Protection Act, which are necessary to protect populations of amphibians and to minimize suffering of frogs. We strongly urge our lawmakers to vote against this effort to strip protection of Michigan's wild amphibians.

Sincerely,



Ruth Marceec, DVM, PhD
Director, National Amphibian Conservation Center
Detroit Zoological Society



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