

February 5, 2025

Dear Chair Hawj and Members of the Committee,

My name is Dr. Dale Gentry, I am the Director of Conservation for Audubon, Upper Mississippi River. Thank you for the opportunity to comment on SF 0540, which we oppose.

Minnesota's iconic state bird the Common Loon is widely adored. There is abundant research on this species because they are long-lived, a species of conservation concern, and easily identified, captured, and counted.

From this research, we've learned that loons can live to over 30 years old. We know that adult loons die from starvation, predators, fights, competition with other loons, parasitic invasions, and they are even eaten by sharks in the Gulf of Mexico in winter. Loon eggs are eaten by numerous mammals and birds and the eggs that survive, hatch into chicks that grow quickly and are the size of an adult by the time they fly south in the fall. Before they can fly, young loons are injured or killed by snapping turtles, large predatory fish, other adult loons, and other predators including Bald Eagles. The question at hand about the influence of the growing number of Bald Eagles on the survivorship of loons was recently studied and just published in [2023 in the journal Avian Conservation and Ecology](#). Loon chicks that hatch inside Bald Eagle nesting territories in Voyageurs National Park did not have a different survival rate than those that hatched outside of Eagle territories. The researchers stated that Bald Eagles eating chicks appears to be opportunistic and random and Bald Eagles are not targeting loon chicks as a main source of prey.

All of these natural causes of death vary by region and are rarely considered a threat to the stability of loon populations. However, research also shows that humans are responsible for the majority of documented deaths. A 2003 study of common loons found that of 209 causes of breeding season mortality, 83% were caused by humans. Of the 174 human-caused deaths, 111 were from lead toxicosis, 30 by trauma caused by boat strikes, 24 by entanglement in fishing equipment, and 8 by poaching. Thus, we shouldn't be surprised that a [2017 study on Common Loons published in the Journal of Wildlife Management](#), showed population-level effects from loons ingesting lead fishing tackle. They estimated that lead tackle mortality reduced the regional population by 43% during the years of the study.

This pattern suggests that efforts to conserve loons should focus on human causes of mortality as they are responsible for the largest % of deaths, and the causes of death that we can most directly influence and prevent.

Sincerely,



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