



February 3, 2025

To: Environment, Climate, and Legacy Committee
Re: **OPPOSE SF 540: Impact of eagles on loons study requirement provision**

Dear Members of the Environment, Climate, and Legacy Committee,

On behalf of our Minnesota members and supporters, the Humane Society of the United States respectfully requests that this committee reject SF 540 for the reasons that follow.

First, the study that this bill requires would be redundant, as new research has already addressed that same question.¹ Published in 2023 in the scientific journal *Avian Conservation and Ecology*, “Survival of Common Loon chicks appears unaffected by Bald Eagle recovery in northern Minnesota” studied interactions between bald eagles and loons in Voyageurs National Park and found that:

- Loons are resilient to bald eagle predation;
- Loon chick survival in Voyageurs National Park was high, at 82%; and
- Loon chick mortalities are linked to factors including the parent loons’ experience, attacks by animals of the same species, disease, pike fish predation, modification of loon habitats and boat collision.

Additionally, even if such a study were to find a threat by bald eagles on loons, no predator control operation on eagles could be authorized because eagles are protected under the Bald and Golden Eagle Protection Act.²

Finally, the Audubon Upper Mississippi River chapter’s 2024 letter to this committee outlined loon natural history and death-loss information relative to this topic,³ including a 2017 study that suggests that most loons die from poisoning by ingesting lead fishing tackle.⁴

For all these reasons, the Humane Society of the United States respectfully requests that this committee reject SF 540 as such a study would be redundant and would do little to fix the underlying anthropogenic problems that loons face.

Sincerely,

Aaron Zellhoefer
Minnesota State Director
azellhoefer@humanesociety.org

¹ Cruz, J., S. Windels, W. E. Thogmartin, S. M. Crimmins, and B. Zuckerberg. 2023. Survival of Common Loon chicks appears unaffected by Bald Eagle recovery in northern Minnesota. *Avian Conservation and Ecology* 18(1):7. <https://doi.org/10.5751/ACE-02395-180107>

² See <https://www.fws.gov/law/bald-and-golden-eagle-protection-act>

³ See https://assets.senate.mn/committees/2023-2024/3130_Committee_on_Environment_Climate_and_Legacy/SF-4534-Audubon-Comment-Letter.pdf

⁴ Grade, T.J., Pokras, M.A., Laflamme, E.M. and Vogel, H.S. (2018), Population-level effects of lead fishing tackle on common loons. *Jour. Wild. Mgmt.*, 82: 155-164. <https://doi.org/10.1002/jwmg.21348>