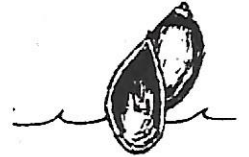


Higgins Lake Swimmer's Itch Organization

2373 S I-75 Business Loop
Grayling, MI 49738



November 2, 2015

Larry A. Harrison, Permits Chief
U.S. Fish & Wildlife Service
Migratory Bird Permit Office
5600 American Blvd. West
Bloomington, MN 55437-1458

RE: Gerrish Township Permit
(Special Purpose - Miscellaneous Permit (MB56627B-0)).
Attachment: HLPOA Letter of Oct. 30, 2015 to Larry A. Harrison, USF&WS

Dear Mr. Harrison,

The Board of the Higgins Lake Swimmer's Itch Organization (HLSIO), representing more than 400 contributors to the comprehensive swimmer's itch program on Higgins Lake conducted by SICON LLC (SICON), strongly support the attached letter sent by the Higgins Lake Property Owner's Association on this same subject. The HLSIO board represents a cross section of the Higgins Lake community including elected leaders of our community, leading members of the business community and lake association leaders.

Our group's mission is to conduct an effective and sustainable swimmer's itch control program for Higgins Lake. For the past year we have supported a jointly managed and funded program on Higgins Lake that retimes the Northpoint Fisheries Management (Northpoint) program. We believe the Northpoint program should begin after July 31 and follow the SICON capture and relocation and nest location and sealing program. We believe that form of joint program emphasizes the humane relocation of common mergansers and uses limited lethal control only when necessary. It avoids a "kill all the ducks" mentality that we believe has developed in support of the Gerrish Township lethal permit. We also believe it ensures that both programs together maximize the qualifications and experience of their respective organizations for the benefit of the lake and reduces the risk of permit violations.

We have recently been made aware of a new Gerrish Township proposal to expand the Northpoint permit to include: 1) an increase in the number of common mergansers lethally taken, and 2) the trapping and relocating of common merganser broods. We are very much opposed to that course of action for two reasons. First, and most importantly, we

remain unconvinced that Northpoint is capable of conducting an effective comprehensive swimmer's itch control program. We are not aware of prior swimmer's itch research or control experience, training, qualifications or equipment by Northpoint to conduct such a complex and important program involving the capture and relocation and nest location and sealing of common mergansers. We believe this also is reflected in the reported permit violations to which we hope you give careful consideration. The second reason we believe this new Gerrish Township plan will have a negative effect on controlling swimmer's itch on Higgins Lake is that, if the plan is approved and permitted, it would be so counterproductive to the program we currently have in place (SICON's science-based, comprehensive plan), that SICON would cease working on Higgins Lake, placing the future of SI research and control (and frankly the future of the lake) solely in the hands of Northpoint Fisheries Management, an ill-qualified group.

Thank you for considering our letter.


Kenneth Dennings, V.P., HLSIO

For the HLSIO Board:

Bill Carey, Law Firm of Carey and Jaskowski PLLC, Grayling, MI
Neal Cooley, Owner – Fred's Restaurant, Roscommon
Dale McDonald, Owner – ReMax of Higgins Lake
Ed Nellist, Supervisor – Lyon Township, Roscommon County
Bob Schneider, Chairman – Roscommon County Board of Commissioners
Jim Vondale, President - HLSIO