

JOHN McCAIN
ARIZONA

CHAIRMAN, COMMITTEE ON
ARMED SERVICES
COMMITTEE ON HOMELAND SECURITY
AND GOVERNMENTAL AFFAIRS
COMMITTEE ON INDIAN AFFAIRS

United States Senate

October 23, 2017

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2201 EAST CAMELBACK ROAD
SUITE 115
PHOENIX, AZ 85016
(602) 952-2410

407 WEST CONGRESS STREET
SUITE 103
TUCSON, AZ 85701
(520) 670-6334

Mr. Michael T. Reynolds
Acting Director
National Parks Service
1849 C Street, NW
Washington, DC 20240

Dear Acting Director Reynolds:

We write to request clarification regarding the Initial Bison Herd Reduction Environmental Assessment (EA) and Finding of No Significant Impact signed on September 1, 2017. Enclosed you will find a letter that expresses concerns about the details of the EA from Mr. James Ammons, the Chairman of the Arizona Game and Fish Commission.

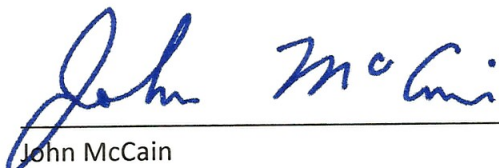
We have long advocated for the development of a comprehensive Grand Canyon Bison Management Plan and a citizen hunt to reduce the unsustainable number of bison that are damaging the Park's environment and affecting visitor safety. While the EA on initial bison reduction appears to be a welcome step forward, we are concerned that the EA may be limited in effectiveness based on the information provided to us by Chairman Ammons.

As we continue to explore legislative options that would direct a bison cull using regulated, skilled volunteer hunters, we would appreciate clarification on certain elements of the EA:

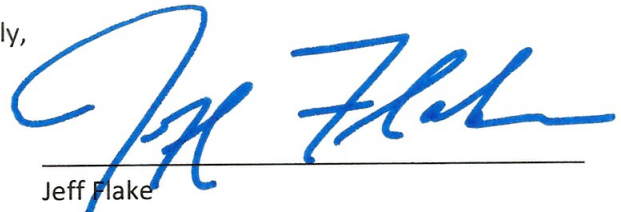
1. Will skilled volunteers be allowed to remove and possess the entire animal harvested, including edible meat, head and hide?
2. Has Grand Canyon National Park yet developed or approved an annual operation plan with the Arizona Game and Fish Commission on Initial Bison Herd Reduction? If not, why?
3. In 2014, the NPS announced it would begin scoping for a comprehensive management plan for the Grand Canyon bison herd. What is the status of the management plan and timeline for further action?
4. The National Park Service has indicated multiple times that bison reduction actions would begin soon, but nothing involving skilled volunteers has occurred to date. Why? Please provide us with dates certain along with a timeline for initial reduction activities.

Thank you for your attention to this request. As always, we ask that this matter be handled in strict accordance with all applicable agency rules, regulations, and ethical guidelines.

Sincerely,



John McCain
United States Senator



Jeff Flake
United States Senator



THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

5000 W. CAREFREE HIGHWAY
PHOENIX, AZ 85086-5000
(602) 942-3000 • WWW.AZGFD.GOV

GOVERNOR
DOUGLAS A. DUCEY

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ERIC S. SPARKS, TUCSON
KURT R. DAVIS, PHOENIX
EDWARD "PAT" MADDEN, FLAGSTAFF

DIRECTOR
TY E. GRAY
DEPUTY DIRECTOR
TOM P. FINLEY



October 5, 2017

The Honorable John McCain
United States Senate
Washington, DC 20510

Re: Grand Canyon Bison Management Plan

Dear Senator McCain,

The Arizona Game and Fish Commission (Commission) has provided input throughout the development of the recent Park Service bison reduction environmental assessment (EA). On September 22, 2017 a supporting finding of no significant impact (FONSI) was released. In reviewing both documents, the Commission finds that its input and concerns have not been adequately addressed. While the EA contains elements that the Commission expected, it fails to address several key matters. The following are not emphasized or required in the Park Service EA and are necessary to provide clarity and to achieve the goal of reducing the herd size to appropriate levels:

- A skilled volunteer must be licensed by the Department to hunt in Arizona
- The hunt should be managed in a manner that is consistent with historically proven, ethical wildlife management in Arizona, and according to state laws
- Hunters should be able to remove and possess the entire animal harvested, including edible meat, head and hide
- A mutually agreed upon annual operational plan and future amendments must have the Department's written approval.
- The Secretary of the Interior must publish a management plan for the Grand Canyon bison herd within 180 days of the passage of legislation.

The Commission requests your assistance to ensure clarification from the National Park Service (NPS) and supports legislative action that will result in the actual implementation of a successful management plan to reduce the bison herd on the Grand Canyon National Park (GRCA).

The North Rim bison population is already too high. The National Park Service (NPS), the Arizona Game and Fish Department, the US Forest Service, the InterTribal Buffalo Council and the Bureau of Land Management are working collectively because bison are already causing serious resource impacts at their current population and geographic distribution. If not managed throughout the entirety of their current home range, including on GRCA, the population will continue to increase. We must develop a reasonable, collaborative, interagency plan to professionally manage a completely free ranging herd of bison that move randomly on any given day across invisible jurisdictional boundaries.

Senator John McCain

October 5, 2017

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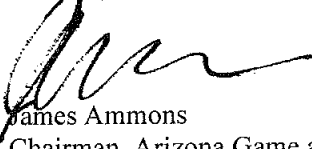
The Department has been invited by the NPS to participate in the development of a plan to reduce bison using the tools provided in the EA, including lethal removal by 'skilled volunteers', but that effort has not started yet. The model for citizen lethal removal identified in the EA is not even remotely consistent with State law, ethical behavior or the North American Model of Conservation. Further, it does not satisfy the Department's requests or statutory responsibility to manage the state's wildlife resource. There continues to be uncertainty regarding the use of capture and relocation compared to lethal removal by citizens, and the numbers of bison to be removed by each method.

NPS has indicated that they hope to begin bison reduction actions next spring, but no firm time line for drafting or implementing a removal plan has been established. The EA explicitly states that not every citizen volunteer would be entitled to the meat from the bison they harvested on the GRCA nor will a citizen volunteer be allowed to retain the head and hide of bison killed on GRCA. While NPS has expressed its intent to make a concerted effort to salvage edible meat for human consumption, the EA clearly reserves the possibility that edible meat could be left to waste in contravention of Arizona state law. Not only is it unlawful to take a game animal and knowingly permit an edible portion to go to waste, it is completely unethical to allow those portions of bison to rot in the field. This waste further denies volunteers a chance to participate in the full richness, tradition, and experience of the harvest of bison.

The Department has managed this herd for eight decades. The current condition of bison spending the majority of their time exclusively on GRCA is a new development that began within the past 10 years. In keeping with its mission to conserve and manage Arizona's diverse wildlife resources for current and future generations the Commission believes legislation is necessary to ensure that we have a more comprehensive bison management plan in place to quickly reduce and redistribute the herd. The Department is Arizona's statutory wildlife authority, providing genuine "boots on the ground" wildlife expertise. The Department's knowledge and experience in wildlife management, including the logistics and challenges of coordinating management efforts, are essential ingredients for the success of this important and timely effort.

Thank you again for introducing the Grand Canyon Bison Management Act during the 114th Congress and voicing the public and environmental need to reduce the bison herd. Your support is needed again this 115th session to manage the herd effectively and protect the native vegetation, sensitive habitats and ensure public safety in Grand Canyon National Park.

Sincerely,



James Ammons
Chairman, Arizona Game and Fish Commission

Cc: Governor Doug Ducey
Hunter Moore, Natural Resource Policy Advisor



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October 5, 2017

The Honorable Jeff Flake
United States Senate
Washington, DC 20510

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Senator Jeff Flake
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Thank you again for co-sponsoring the Grand Canyon Bison Management Act during the 114th Congress and voicing the public and environmental need to reduce the bison herd. Your support is needed again this 115th session to manage the herd effectively and protect the native vegetation, sensitive habitats and ensure public safety in Grand Canyon National Park.

Sincerely,



James Ammons
Chairman, Arizona Game and Fish Commission

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Hunter Moore, Natural Resource Policy Advisor