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*Park:* Grand Canyon National Park  
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Arizona Sportsmen for Wildlife Conservation (AZSFWC) is a non-profit 501(c)(3) organization made up of 27 member organizations with over 5000 sportsmen and women supporting conservation work in Arizona. On June 6, 2014 we submitted comments on your Bison Management Plan and EIS during that Public Scoping period. Now almost 2 years later, you have changed the process to an EA, so here we are again.

As concerned sportsmen and women, we appreciate the challenges faced with managing bison and have some firsthand experience and reference with the magnitude of that task due to our working relationship with the AZ Game & Fish Department (AZGFD). Many of our members and supporters also have a strong desire and passion to hunt bison from this House Rock herd, as it is one of the few remaining free ranging herds in North America. In fact we have sportsmen and women who have tried for literally decades to get drawn for one of these coveted tags from the AZGFD!

In our June 2014 comments, we supported many of the proposals put forth in your "suite of management tools" for you to utilize in the proposed bison management efforts. Our organization continues to support a variety of efforts to help mitigate further damage the bison may inflict on the Grand Canyon National Park(Park). Some of those suggestions include: •Construction of bison proof ex-closures to protect riparian areas, other water sources and sensitive archaeological and historical sites. •Development of a bison education plan for park visitors, including a history of the bison in and around the park, the ongoing management plan underway, as well as safety matters when encountering these animals. •This would

*Comments:* also allow park visitors to continue viewing this native, iconic animal, which just

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happens to be on the National Park Service(NPS) logo. •Develop plans to enhance the bison herd's migration away from sensitive areas. •Work at improving forage, range and water sources for the herd to ensure migration efforts are successful to desired locations. •Most importantly, if baiting, soft handling, herding and hazing don't work to move the bison, any lethal removal of the animals should be coordinated with the AZGFD, using "skilled public volunteers" aka sportsmen with tags, not paid sharpshooters!

We understand "hunting" is currently not allowed on the Park, but it only makes economic sense to utilize "skilled public volunteers" who are willing to pay to harvest/lethally remove a bison, versus having the NPS pay a contractor to do it!

These population reduction measures on the Park could use "skilled public volunteers" selected through the AZGFD draw application process, and would be licensed accordingly. The successful applicants could attend an information session prior to the pursuit to harvest, similar to what they do now. The controlled harvests could be scheduled at such times when access to the Park is limited by road conditions or the season, and could be undertaken with both the guidance of AZGFD and NPS personnel as well. In addition to the potential harvest of designated animals, compliance with all rules and regulations both by the NPS and AZGFD would be understood, including designated weapon type, proper firearms handling, and elimination of any wanton waste of a harvested animal.

AZSFWC strongly encourages the NPS to work in concert with the AZGFD to mutually solve the bison issues and problems. We believe this cooperation will not only help solve the problems bison are causing in the Park, but also preserve future hunting and harvest opportunities for sportsmen and women in Arizona, and from across the country.

Some will argue there is no "hunting" on the Park, but that is not the case in other National Parks, so it shouldn't be a road block here! For decades, wildlife management efforts across North America have had "hunting" in the tool box of State game and fish agencies, and not just on public land, but also on military reservations, National Monuments and even urban areas where public health and safety concerns need to be taken into consideration.

AZSFWC believes a coordinated effort with AZGFD utilizing licensed and trained hunters can not only effectively, efficiently and expeditiously "cull" the potential 400 animals you want removed from the Park, but can do so without the financial burden the NPS would be subjected to if it paid sharpshooters to do the culling. In a time when the NPS is under financed and deeply in the red, it simply makes economic sense to let hunters in to help!

Yours in Conservation, Jim Unmacht AZSFWC President

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