



June 14, 2017

Chris Lehnertz
Superintendent
Grand Canyon National Park
PO Box 129
Grand Canyon, AZ 86023

RE: AZSFWC comment on Grand Canyon Bison EA

Comment ID: 1223841-79883/644

On behalf of Arizona Sportsmen for Wildlife Conservation (AZSFWC) thanks for the opportunity to comment on this EA. We have to tell you however that it is quite disappointing that after several years, two Park superintendents, lots of meetings, input and more input, you are now proposing two options to consider with a "*suite of management tools*" that not only prolongs the problems associated with the bison on the park, but does so in an inefficient, costly way that disregards the state ownership and control of the animals, and is predicated on more funding from taxpayers to make it all happen.

The two options you propose fall far short of efficiently and effectively remedying the issues and problems. Alternative 1 is not even realistic! To do nothing allows the Park resources to continue to be degraded, the bison to continue to proliferate, and more sensitive habitat areas destroyed. It's a non-starter.

Alternative 2 seems to be an effort to placate citizen hunters to allow them to help cull some animals once they become trained and "skilled" letting them join teams of volunteers and tribal members in the effort. In addition, the plan calls for the animals to be hazed, rounded up, corralled and captured, whereupon you could give them away to "*willing recipients, such as tribes, the state of Arizona, other federal agencies, and non-governmental organizations.*" We object to this Alternative too!

Most of Arizona's sportsmen and women aren't interested in culling a bison/buffalo in a group setting just for the meat. They want the opportunity to hunt and harvest

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a buffalo in a fair chase setting and if successful, retain the entire animal, including the meat, hide and horns. And, they are willing to pay for the chance to do that!

While you have spent untold hours and money assessing and evaluating this issue, you have literally ignored a common sense, bureaucracy reducing, taxpayer savings, financially prudent solution to too many bison and too much habitat degradation on the Grand Canyon National Park. You are not taking advantage of, nor utilizing the expertise of the Arizona Game and Fish Department (Department) to not only manage this herd, but are also ignoring the opportunity with that partnership to reduce the herd to manageable levels with citizen hunters willing to pay for the chance to hunt them!

You should adopt a model already in use with your agency similar to what transpires on the Grand Teton National Park in dealing with elk.

<https://www.nps.gov/grte/planyourvisit/elkreduction.htm>

We will suggest another alternative we'll call the "Grand Canyon Bison Management Reduction Program":

- First, these bison aka buffalo, were initially purchased by the state of Arizona, are owned by the state of Arizona, and have been managed by the Department since 1929. This should continue in concert with the NPS.
- The North American Model of Wildlife Conservation should govern the management of these state owned animals.
- Management options would be set forth into a timetable to reduce the bison on the Park to 200 animals in 3 to 5 years.
- The Department should manage public hunting opportunities available for all citizens.
- Citizen hunting would invoke the highest level of ethics coupled with the proper treatment and handling of the carcass as a standard, with the meat, head and cape going to the successful hunter.
- Taxpayer dollars should not be used to "cull", butcher and process bison that are shot on the park...let citizen hunters pay for the privilege!
- Other "tools", such as planning, hazing, round up, capture and translocation of these bison owned by the state of Arizona should be carried out jointly with the Department and the NPS, with disposal options going first to the Department.
- We are continually told hunting is not allowed on National Park land, which is not true! As noted elk hunting is allowed on the Grand Teton National Park (Grand Teton) and coordinated with the Wyoming Game & Fish Department.
- In addition, hunting is allowed on 51,097,000 acres of NPS administered lands, 60% of the total!
- <https://www.doi.gov/blog/hunting-and-fishing-national-parks-and-fish-and-wildlife-refuges>

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- Park issues unique to Grand Canyon should be treated in a similar fashion as those that arose with Grand Teton and consider their model as a guideline: <https://www.fws.gov/bisonandelkplan/>

AZSFWC is a 501c-3 non-profit organization consisting of 40 member and affiliate groups representing thousands of sportsmen and women. Our groups and members have a passion for the outdoors ranging from wildlife conservation, hunting, angling, shooting, hiking, camping, youth activities, outdoor education and outdoor related businesses.

AZSFWC and 28 of our member organizations urge you to adopt the measures outlined above, to not only put an end to the habitat and resource degradation on the Park, but to do so in concert with the Arizona Game and Fish Department and citizen hunters who are willing to pay to address the problem.

Thank you!

Jim Unmacht

AZSFWC Executive Director

Cc: Secretary Zinke, Department of Interior

Senator John McCain

Senator Jeff Flake

Arizona Congressional Delegation

Arizona Game & Fish Commission

Arizona Governor Doug Ducey

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**AZSFWC Member Groups Supporting
Suggested Alternative for Bison Management on the
Grand Canyon National Park**

**Anglers United
AZ Antelope Foundation
AZ Bass Federation Nation
AZ Big Game Super Raffle
AZ Bowhunters Association
AZ Catfish Conservation Association
AZ Chapter National Wild Turkey Federation
AZ Chapter Safari Club International
AZ Council of Trout Unlimited
AZ Deer Association
AZ Desert Bighorn Sheep Society
AZ Elk Society
AZ Flycasters Club
AZ Houndsmen
AZ Outdoor Sports
AZ Shooting Sports Education Foundation
Christian Hunters of America
Coconino Sportsmen
Kahuna's Kids
Mohave Sportsman Club
Outdoor Experience 4 All
South Eastern AZ Sportsmen Club
Southwest Wildlife Foundation
SRT Outdoors
The BASS Federation
Valley of the Sun Quail Forever
Xtreme Predator Callers
1.2.3.Go...**

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