



March 30, 2022

Submitted via email: comments-southwestern-kaibab-north-kaibab@fs.fed.us

Randall Walker, District Ranger
North Kaibab Ranger District
Kaibab National Forest
430 S. Main
Fredonia, AZ 86022

RE: Scoping for the House Rock Wildlife Area Bison Management Improvements Project

Arizona Sportsmen for Wildlife Conservation (AZSFWC) appreciates the opportunity to comment on Scoping for an Environmental Assessment (EA) covering a series of infrastructure improvements on the House Rock Wildlife Area (HRWA), managed by the Arizona Game and Fish Department (AZGFD).

AZSFWC is a 501c-3 non-profit organization dedicated to wildlife conservation, habitat improvement, youth recruitment and retention, as well as educating outdoor enthusiasts on issues important to their passions. AZSFWC member, affiliate, and associate groups reach across the spectrum of hunting, angling, shooting, outdoor recreation, and businesses from across Arizona. Our member groups represent more than 16,000 people from Arizona.

Our organization and members have a keen interest in the management of HRWA and its bison herd. The area has a unique history and provides unparalleled opportunities to pursue bison, the hunt of a lifetime for many Arizonans. The 2019 Arizona Bison Management Plan provided updated guidance for HRWA, which we fully supported. We appreciate the close collaboration between the Kaibab National Forest (Forest) and AZGFD in implementing this plan, of which the forthcoming EA is a major part.

AZSFWC agrees that the proposed infrastructure improvements; fencing, a new catchment water development, and new cattle guards on existing Forest Service roads, are essential to meet goals of the plan. Those objectives include concentrating bison on HRWA, facilitating bison handling, growing the herd in balance with habitat carrying capacity, and establishing a Conservation Herd to support broader bison restoration efforts.

AZSFWC letter supporting HRWA Bison Management Improvements Project – 3-30-2022

Arizona Sportsmen for Wildlife Conservation
PO Box 75731 New River, AZ 85087

The scoping package includes two fencing options on the northwest boundary of HRWA. Option #1 would reconstruct an existing fence line along the adjacent Saddle Mountain Wilderness. Option #2 would add 13 miles of new fencing east of the wilderness boundary.

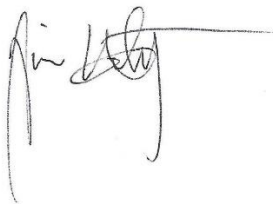
After reviewing the two options, AZSFWC believes that Option #1 is the most appropriate course of action based on the following:

- Rebuilding/upgrading the existing fence is far more cost efficient with respect to labor and materials. Constructing new fence also adds significant expenditures for planning and compliance, including cultural resource surveys. Our understanding is that the Forest does not have funding for this infrastructure work and AZGFD will bear the full cost.
- The new fence alignment is located in areas where fencing has not been present historically and includes acute angles which can function as "traps" for bison, mule deer, and other wildlife. This approach does not appear particularly "wildlife-friendly" and could incur additional long-term maintenance issues.
- Construction of new fence creates additional, undesirable visual impacts on the landscape. It appears that under Option #2, the old boundary fence would not be removed and AZGFD would be required to maintain it. This translates into additional costs (without resource benefits) and cumulative impacts to visual resources.
- The new fence option decreases the net area of habitat available to bison on HRWA.

We understand that projects proximate to, or within wilderness can be a concern to some members of the public, however, it appears that Option #1 can be readily implemented in full compliance with the requirements of the Wilderness Act.

Accordingly, AZSFWC and 27 of our member organizations (list follows) request that the Forest move forward with Option #1 in the forthcoming EA.

Thank you for your consideration!



Jim Unmacht
Executive Director



AZSFWC Member Organizations Supporting HRWA Bison Improvements Project Option #1

Anglers United
AZ Antelope Foundation
AZ Bass Federation Nation
AZ Big Game Super Raffle
AZ Chapter of Safari Club International
AZ Council of Trout Unlimited
AZ Deer Association
AZ Desert Bighorn Sheep Society
AZ Elk Society
AZ Flycasters Club
AZ Houndsmen's Association
AZ Outdoor Sports
AZ Predator Callers
AZ State Chapter of National Wild Turkey Federation
Ben Avery Clay Busters
Christian Hunters of America
Mogollon Sporting Association
No Excuse Hunting and Outdoors
Outdoor Experience 4 All
Southern AZ Quail Forever
Southwest Wildlife Foundation
SRT Outdoors
The BASS Federation
Theodore Roosevelt Conservation Partnership
Trust for Public Land
Valley of the Sun Quail Forever
Yuma Valley Rod & Gun Club

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