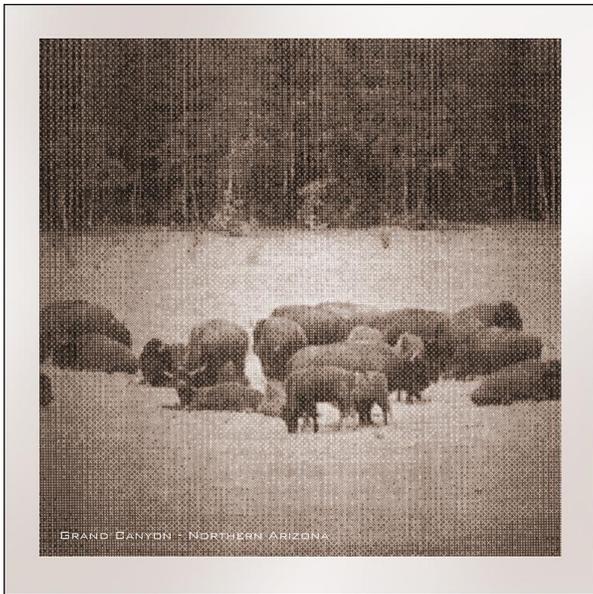


Grand Canyon Hikers and Backpackers Association
Response to the

Public Scoping and Notice of Intent
Regarding the

Bison Management Plan and
Environmental Impact Statement
for Grand Canyon National Park



Presented by:
Christopher Forsyth
President
Grand Canyon Hikers and Backpackers Association

June 5, 2014



GRAND CANYON HIKERS & BACKPACKERS ASSOCIATION

PO Box 30233, FLAGSTAFF, AZ 86003-0233

Superintendent David Uberuaga
Grand Canyon National Park
PO Box 219
Grand Canyon, AZ 86023

June 5, 2014

Dear Superintendent Uberuaga,

The Grand Canyon Hikers and Backpackers Association (GCHBA), founded in 2000, is an organization formed to encourage hikers and backpackers to enjoy the splendid natural backcountry wilderness and corridor resources of Grand Canyon National Park (GRCA) on foot. When we talk to people who do not explore the backcountry of Grand Canyon, as well as members, about bison in Grand Canyon National Park, the reaction to the possibility to see bison in the wild on the North Rim and Kaibab Plateau is for the most part very positive.

With that in mind, we respectfully submit the following scoping comments for GRCA's Bison Management Plan:

1) We Support Bison in Grand Canyon National Park

Our constituents are for the most part very pleased when they see bison in the Park. It is our understanding that the bison in question were brought to an area inside what is now GRCA before the formation of GRCA. It is also our understanding that bison, at least in small numbers, were present on the North Rim of Grand Canyon and surrounding areas as far back as the days of the California Condor, over 13,000 years ago. Our organization supports the presence of a viable bison herd in the park. We do not support the eradication of bison from the park, and would like to see GRCA be part of a natural circuit that the bison would take, spending the summers in the North Rim highlands of the park and wintering in the House Rock Valley. If this seasonal migration were unacceptable to GRCA, we would not like to see GRCA devoid of bison, and would then encourage GRCA wildlife managers to preserve a small viable herd of bison that would remain in the park year-round.

2) We support the concept of managing the herd size to fit the available land base.

The limited availability of viable bison habitat in North America makes the herd presence here at Grand Canyon a truly unique management opportunity. The bison are showing they can sustain themselves unaided within the park, something very important to bison management.

In a recent GRCA Bison Management Plan scoping webinar, it was pointed out that the House Rock Valley (HRV) bison herd was managed at about 100 animals, and that this number was a rough size but was intended to match the number of animals to the land set aside for the bison. We support this concept of matching herd size to available land and range health, and we support including GRCA lands in the range of this bison herd.

If management decisions allow the herd to increase above 100 animals to a new number, based on the addition of GRCA lands being made available to the herd, we would support and encourage such an increase in the herd size as long as park land range health is maintained.



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Ideally, we would like to see wolves introduced on the North Rim to control bison numbers. Until such time as we get to comment on a Grand Canyon National Park Wolf Management Plan, we understand that some sort of bison population control will need to be accomplished to keep the herd and North Rim lands healthy.

Prior to the HRV herd's movement into GRCA, the HRV bison herd's population was historically held in check by sports hunting. We understand that sportsman hunting on the United States Forest Service Kaibab National Forest (USFS) is allowed, while sportsman hunting within the park is not allowed. While we support these restrictions, it is clear that the bison are in the park due to hunting pressures placed on the herd outside the park while there presently is no culling activity within the park.

We therefore encourage culling within GRCA as a means to limit the bison population. That said, culling within the park needs to be done with respect, in such a way that supports the least amount of wasting of this valuable food source, is not done indiscriminately, and does not eradicate bison from the park.

3) We support the concept of using sportsman hunting outside the park and culling within the park as a way to move the herd seasonally in and out of the park.

It was made clear to us that sportsman hunting of this herd in the adjacent United States Forest Service Kaibab National Forest (USFS) is allowed, while sportsman hunting within the park is not allowed. To reiterate, while we support these restrictions, bison are in the park due to hunting pressures placed on the herd outside the park while there presently is no culling activity within the park. Therefore, we encourage culling within GRCA as a means not only to limit the bison population, but as a way to move the herd away from and back into the park seasonally.

We also support using mobile water tanks as a way to move the herd away from and back into the park seasonally.

4) Seeps, Springs and Archeological Resources Must Be Protected.

We support the preservation of seeps, springs and archeological resources within and outside of GRCA. We encourage GRCA to protect park resources with the use of drift fencing. As a way to preserve seeps and springs, we also support the construction of additional transitory watering locations, as is done for the benefit of other wildlife. We do not see the preservation of seeps, springs and archeological resources as a reason to completely remove bison from the park. We suggest that bison and the seeps, springs and archeological resources of the park can and should all be preserved with the park.

5) Are these bison cattle?

We have no expertise in bison-cattle DNA analysis. That said, we understand and have seen that the HRV bison herd is healthy, and they look like bison and act like bison. Given that North American bison were estimated to be in the tens of millions and were hunted down to less than 100 animals, we do not see genetics as a viable argument to restrict the HRV bison from the park.



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6) We encourage NPS to implement a visionary Bison Management Plan.

It is our understanding, based on the GRCA Bison Management Plan scoping webinar, that the Arizona Game and Fish Department (AZGF) and the USFS have a cooperating agreement to manage the bison in a geographical area north and east of GRCA, with AZGF operating the hunting permits for the HRV bison herd. We encourage GRCA to include GRCA lands on the North Rim as part of the USFS-AZGF House Rock Valley (HRV) bison herd range.

The fact that the bison are moving west along the USFS hunting/GRCA no-hunting boundary indicates a desire by the herd to move about and increase its available range. We wholeheartedly support including GRCA lands as bison range for access by the HRV bison herd.

While possibly outside of the scope of this plan, we encourage GRCA planners and managers to work with the Bureau of Land Management and Grand Canyon-Parashant National Monument to explore the possibility of continuing to expand the HRV bison range to include additional lands west of GRCA on the Arizona strip including the Shivwits Plateau.

Thank you again for this opportunity to submit comments on Grand Canyon National Park's Bison Management Plan. We are thrilled that bison are in the park and look forward to seeing them thrive in the park, Kaibab National Forest and the House Rock Valley now and into the future.

Sincerely,

Christopher Forsyth
President
Grand Canyon Hikers and Backpackers Association