

RIVER RUNNERS FOR WILDERNESS

A PROJECT OF LIVING Rivers

Dave Uberuaga
Superintendent
Grand Canyon National Park
PO Box 129
Grand Canyon, Arizona 86023

April 3, 2016

Dear Superintendent Uberuaga,

Thank you for allowing the non-profit River Runners for Wilderness (RRFW) to provide scoping comments on a Grand Canyon National Park Bison Management Plan changing scope to become an Environmental Assessment. RRFW has over 2,000 members and our periodic news releases through our RRFW Riverwire reach well over 10,000 river enthusiasts who care about river running and resource issues pertaining to wilderness rivers.

We apologize for not submitting these comments within the thirty day comment period open between 02/25/2016 and 03/26/2016. Our focus was on our twenty pages of comments on the Backcountry Management Plan Draft EIS, with a closing date of April 4, 2016. While our comments are eight days overdue, we request you add them to the public scoping record for this Environmental Assessment planning process.

We appreciate Grand Canyon National Park (GRCA) releasing a Bison management public scoping newsletter in February of 2016. It is the only supporting documentation from GRCA we have to go by to help in making substantive comments on converting the Grand Canyon National Park Bison Management Plan Environmental Impact Statement into an Environmental Assessment.

We agree that immediate action is required to implement Bison population reduction controls. One way to begin to do this in a timely fashion is to implement a Bison Population Reduction Environmental Assessment.

That said, we do not agree that the Grand Canyon National Park Bison Management Plan Environmental Impact Statement (EIS) should be abandoned or converted to an Environmental Assessment. The EIS should continue while GRCA conducts a much quicker Bison Population Reduction Environmental Assessment. There is nothing in the supporting documentation to justify abandoning a long term planning environmental impact statement for Bison management on the North Rim of Grand Canyon National Park.

The February, 2016, newsletter notes “The NPS and cooperators agree that the free-ranging bison occupying the park’s North Rim lands and adjacent jurisdictions are native wildlife at the southwest edge of their historic range.” This is a huge step forward and we appreciate GRCA planners identifying and agreeing with this key point.

The February, 2016, newsletter also states “The current population density, now estimated between 400 and 600 animals, is not consistent with what biologists would expect to see at the edge of the species’ distribution. The NPS and cooperators also agree the bison should be

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managed collaboratively across a multi-jurisdictional landscape and that the population should be reduced as quickly as possible to minimize potential effects on other natural and cultural resources.”

We concur with all the points raised here. The current population density is too high. It is encouraging to read that multi-agency action will manage this Bison population over a large geographical area that includes, but is not limited to, Grand Canyon National Park. We also concur that action to control and manage the Bison population should be undertaken as soon as possible, with the intent to reduce, but not eliminate, Bison population numbers. We would like to reiterate our earlier support for the continued presence of bison as an integral part of the Grand Canyon National Park high-country ecosystem.

As noted in our earlier comments, under ideal conditions wolves would be the keystone species that would keep the bison population in check. We encourage a multi-agency approach to wolf re-introduction to the high country of the North Rim as an aid in controlling the bison herds' population numbers. At the very least, this multi-agency Bison Management Planning should recognize that at one point in the near future wolves can and should be introduced as a management tool for bison population control at Grand Canyon National Park.

As noted in our earlier comments, we support the use of simple split rail fencing to protect seeps, springs and archeological resources on a case by case basis.

In closing, we encourage Grand Canyon National Park Planners to do everything possible to manage a robust and healthy bison herd at Grand Canyon National Park to encourage the survival of this magnificent species which represents our American heritage.

Thank you again for this opportunity to submit scoping comments on the management of bison in Grand Canyon National Park.

Sincerely,



Tom Martin, Council Member
River Runners for Wilderness