

Grand Canyon National Park  
P.O. Box 129  
Attn: Bison Management Plan EA  
Grand Canyon National Park, AZ 86023

Dear Sir:

This letter is in response to the request for public comment (attachment) on the proposed bison herd reduction on the Grand Canyon's North Rim. Instead of herd reduction, we propose that there is a primary and compelling reason the Arizona Game and Fish Department should remove all bison (*Bison bison*) from the north rim of the Grand Canyon.

In the Initial Bison Herd Reduction Environmental Assessment (Grand Canyon National Park, Arizona, May 2017), the following is indicated (Page 14): "The American bison (*Bison bison*, Linnaeus 1758) had the largest historical range and broadest array of ecological settings of all North American native ungulates—across boreal, coniferous and deciduous forests, Holarctic settings, local riparian to major river deltas, desert and montane grasslands, great and high plains, inter-mountain basins, and from coastal plains upwards towards 10,000 feet elevation."

While a wide distribution of bison across much of North America may have been the norm, there is no evidence cited in the EA that bison herds were pre-historically present along the north rim of the Grand Canyon. Similarly, Truett (1996) found no archeological evidence of bison remains in Arizona north of the Grand Canyon. Unless, compelling data are provided that these mammals were pre-historically present (i.e., prior to Euro-American Settlement) and that the bison introduced by Arizona Fish and Game Department in 1906 are descendants of that original genetic stock, it would seem that the introduced bison are exotic to the area. This is equivalent to introducing species to the North Rim such as Alberta moose (*Alces alces*), musk ox (*Ovibos moschatus*), or some other iconic large herbivore that is a native species somewhere else in North America. It is not really very different as the introduction of feral domestic horses to many areas of the West. They are exotic and deleterious to the native flora and fauna. To keep bison present in the park, at a time when bison populations elsewhere in North America have increased greatly over the last several decades is not warranted on ethical or ecological grounds and is counter to well-established policies of the US Park Service

In addition, there are two supporting reasons why all bison should be removed. These include:

- (1) There are no native large predators along the north rim of the Grand Canyon that would normally be associated with a bison population, i.e., grizzly bears (*Ursus arctos*) and gray wolves (*Canis lupus*). Thus, there are no large mammalian predators in place to mediate bison behavior and/or densities.
- (2) Unimpeded bison herbivory and trampling, as is indicated in the Initial Bison Herd Reduction Environmental Assessment, create numerous adverse impacts to the native biota (plant communities, riparian areas, wildlife) as well as archeological sites, soils, and other park resources. While reducing numbers of bison helps to reduce those impacts, lower

numbers of bison do not prevent these adverse effects from continuing to occur over time. Again, such impacts are counter to Park Service goals and policies.

For the above reasons, we strongly recommend that the Arizona Fish and Game Department, the department that introduced this species over a century ago, be required to remove all bison from the north rim of Grand Canyon National Park.

Sincerely,

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Cited literature:

Truett, J. 1996. Bison and elk in the American southwest: in search of the pristine.  
Environmental Management 20(2): 195-206.

## **Attachment**

**Dated: May 9, 2017**

### **National Park Service Seeks Public Comment on an Initial Bison Herd Reduction Environmental Assessment for Grand Canyon National Park**

**Grand Canyon, Ariz.** – The National Park Service (NPS) has announced that the Initial Bison Herd Reduction Environmental Assessment (EA), which evaluates management actions related to bison on Grand Canyon’s North Rim, is available for public review and comment. The EA was prepared in collaboration with cooperating agencies — the Arizona Game and Fish Department, the U.S. Forest Service, the Bureau of Land Management, and the InterTribal Buffalo Council.

The bison on the park’s North Rim descended from animals brought to northern Arizona in 1906. In the 1990s the bison herd, which the Arizona Game and Fish Department has managed in the House Rock Wildlife Area on the Kaibab National Forest since 1929, began venturing onto the North Rim of the park. Most of the bison herd now spends a majority of its time inside the park.

Biologists estimate that since the early 1990s the herd has grown from approximately 100 bison to between 400 to 600 bison that currently roam the Kaibab Plateau. Estimates also show that this bison herd could grow to nearly 800 bison in the next three years and as large as 1200 to 1500 animals within ten years if further management actions are not taken.

Given the current bison distribution, abundance, and density and the expected growth of this herd, the NPS is concerned about increased impacts on park resources, such as water, vegetation, soils, and archaeological sites; and on values such as visitor experience and wilderness character.

The purpose of the actions evaluated in this EA are to (1) quickly reduce bison population density in collaboration with other agencies with jurisdiction for bison management on the Kaibab Plateau, and (2) protect Grand Canyon National Park resources and values from the impacts of a steadily growing bison population.

Through the preferred alternative, the NPS, working together with cooperating agencies and partners, would reduce the bison herd to fewer than 200 animals using lethal culling with skilled volunteers and non-lethal capture and removal. Considering the size of the current bison population, the proposed herd reduction could be achievable over a period of three to five years and is consistent with recommendations for a herd size that would reduce or prevent impacts on park resources.

The NPS seeks the public’s thoughtful review and comments during the 30-day comment period, which concludes on June 7, 2017. The EA is available on the NPS Planning, Environment and Public Comment (PEPC) website at: [http://parkplanning.nps.gov/grca\\_bison](http://parkplanning.nps.gov/grca_bison).