May 4, 2021

The Honorable Deb Haaland
Secretary
Department of the Interior
1849 C Street, N.W.
Washington DC 20240

RE: Hunting of bison inside Grand Canyon National Park

Dear Secretary Haaland:

On behalf of Animal Wellness Action, the Animal Wellness Foundation, the Center for a Humane Economy, SPCA International, and other organizations, we write to express our concern regarding the National Park Service's decision to manage the bison (*Bison bison*) in Grand Canyon National Park (Grand Canyon) with a de facto hunting program. It may be euphemistically called a cull, but the NPS is to conduct a lottery to select participants, allow the lottery winners to enter the park with firearms, and authorize them to gun down bison and leave with the carcass and trophy. This is at odds with the statutory and foundational values for Grand Canyon and this plan must be scuttled and revamped in favor of non-lethal approaches.

The National Park Service (NPS), and the Congress, have long prohibited sport hunting of animals within national parks and national monuments, with very rare exceptions. There is no hunting of elk, deer, and other domesticated animals in Grand Canyon. The NPS should not start hunting programs now. There are vast areas of northern Arizona managed by the U.S. Forest Service, the Bureau of Land Management, and the state of Arizona that allow sport hunting.

While bison may have been reintroduced to Grand Canyon more than a century ago, this area is part of their historical and pre-historical range. Bison species have, since the Pleistocene, ranged from Yukon and Alaska to the Valley of Mexico. They are native to northern Arizona, just as wolves in Yellowstone are native there even though the present populations descend from wolves captured in Canada. The same is true with the recent introduction of wolves to Isle Royale National Park or cougars from Texas reintroduced to turn around inbreeding of Florida panthers at NPS units in South Florida. The bison has an outsized place within the annals of the National Park Service as well, and it is prominently featured on the logo of the agency.

Concerns about bison impacts on the land are exaggerated and more a matter of aesthetics than ecology. These are large animals who gather in herds. Like any animal of its size, they will leave footprints on the land, consume forage and water. NPS's decision to raffle off hunting opportunities is not a serious-minded plan to address meaningful ecological problems, but instead a political action designed to appease a few enthusiasts for trophy hunting of the animals. Not even in Yellowstone National Park, where the treatment of bison by multiple state and

federal agencies has come under intense scrutiny, is the NPS allowing hunters in to kill bison within the boundaries of the park.

In circumstances where NPS makes an argument for population management, those methods must be aligned with the purposes and values of the agency. Even when the NPS in the 1970s and 1980s viewed populations of burros at Grand Canyon as a management problem and a non-native species, it eventually allowed animal protection groups to conduct a large-scale capture and translocation program. In the end, the Park Service did not resort to mass shooting the animals by sharpshooters or hunters, and the public heartily endorsed the compassionate, non-lethal approach, while NPS still honored its management objectives.

The final bison management plan for Grand Canyon, released in September 2017, focuses primarily on managing the bison population through lethal methods and does not sufficiently examine the benefits of a humane, non-lethal, and sustainable population management plan.

The NPS has long used Porcine Zona Pellucida (PZP), an immunocontraceptive vaccine, for management of free-roaming equids and deer. While we recommend no serious intervention with bison in Grand Canyon, it is clear that fertility control would be a very practical strategy for this small, well-habituated population of bison should the NPS insist on a reduction strategy. Disinterested scientists have documented PZP to be safe and effective as a primary tool in managing free-roaming bison herds. On Catalina Island, off the coast of California, the birth rates of bison treated with PZP declined from approximately 67 percent prior to treatment, to 10.4 percent in the first-year post-treatment, and 3.3 percent in the second year after initial treatment.[1] After the initial treatments with the vaccine, no new calves had been observed on Catalina Island, suggesting that bison may not resume normal reproduction for at least three years following repeated applications of PZP.[2]

If the NPS structures a management program properly, and efforts are made to either capture and vaccinate or remotely dart a high proportion of female bison, the herd's reproductive rate could be immediately reduced to levels approaching zero. Park personnel, working with volunteers and other partners, could initially reduce the bison population humanely to desired levels and then, importantly, maintain a stable population thereafter. Indeed, because of the small size and unique geography of the area, and the behavior of the bison, the impact of program would be swift, and federal managers would achieve their objectives, just as the NPS witnessed on Catalina Island.

If the Park Service ignores fertility treatment to manage herds and opts for lethal control, it will essentially obligate the agency to kill bison for years. Surviving bison will increase their rate of reproduction, and calf survivorship will increase. This will land the Park Service on a treadmill, requiring more hunting programs in the future. Fertility control, if actively maintained, can be an enduring solution for this relatively small, accessible population of bison. And it is a relatively

[1] Duncan, C.L., J.L. King, and J.F. Kirkpatrick. 2013. *Romance Without Responsibilities: The use of the Immunocontraceptive Porcine Zona Pellucida to Manage Free-Ranging Bison (Bison bison) on Catalina Island, California*, USA. Journal of Zoo and Wildlife Medicine. 44(4s):S123-S131.

[2] Duncan, C. L., J. L. King, and P. Stapp. 2017. *Assessing ovulation cycling and vaccine reversibility in American bison (Bison bison) treated with porcine zona pellucida (PZP).* Proceedings of the 8th International Conference on Wildlife Fertility Control.

non-controversial approach, solving the management concerns of some observers and accommodating the humane concerns of others.

Millions of Americans and tourists flock to the north rim of Grand Canyon. Hunting will not sit well with them, especially in contrast to a viable, non-lethal method of management. Bison are one of our nation's most iconic animals; tourists come from across the nation to visit and photograph the canyon and its surrounding ecosystem with specific hopes of spying one of these magnificent animals in the wild. Lethal removal of these animals will unfavorably alter the public's perception of park management, and as result, potential tourists may decide to spend their time and money elsewhere, thereby curbing revenues in gateway communities and hurting the local economy. Surviving bison would be wary, and less likely to congregate near park visitors, degrading their wildlife-watching experiences.

We hope you will terminate a thinly disguised public hunting program within Grand Canyon National Park. If you insist on active management of this small herd, there are superior methods far better aligned with the value system of the NPS. One of the world's best-known national park units should strive for a more humane outcome.

Sincerely,

Wayne Pacelle
President
Animal Wellness Action

cc: Mike Reynolds
Ed Keable
The Honorable Raul Grijalva
The Honorable Joe Neguse
The Honorable Kyrsten Sinema