



May 28, 2015

The Honorable Jim Inhofe
Chairman
Senate Environment and Public Works Committee
410 Dirksen Office Building
Washington, DC 20510

The Honorable Barbara Boxer
Ranking Member
Senate Environment and Public Works Committee
456 Dirksen Office Building
Washington, DC 20510

The Honorable Rob Bishop
Chairman
House Committee on Natural Resources
1324 Longworth House Office Building
Washington, DC 20510

The Honorable Raul Grijalva
Ranking Member
House Committee on Natural Resources
1324 Longworth House Office Building
Washington, DC 20510

Re: Support for H.R. 1443 and S. 782, the Grand Canyon Bison Management Act.

Dear

Safari Club International supports H.R. 1443 and S.782, the Grand Canyon Bison Management Act. This legislation will provide sportsmen and women with a unique opportunity to participate in sustainable-use conservation in Grand Canyon National Park and will help the National Park Service better manage the Park's wildlife.

The National Park Service (Service) already has the authority to allow "skilled public volunteers" to assist in the reduction and management of wildlife populations on National Parks. In *WildEarth Guardians v. National Park Service*, the U.S. District Court for the District of Colorado and the U.S. Tenth Circuit Court of Appeals each affirmed the Service's authority to authorize members of the hunting community to act as volunteers during wildlife management operations. H.R. 1443 and S.782, however, contain three important elements that go beyond the scope of authority provided to the Secretary of the Interior in existing law. First, the bills

obligate the Secretary to utilize skilled public volunteers to reduce the bison population within the Park. Second, they require the Secretary to publish a management plan to reduce the bison via lethal culling by skilled public volunteers within six months of enactment of the Act, rather than give the Service the discretion to wait several years before producing a management plan that includes the utilization of skilled volunteers. Third, the legislation provides the skilled public volunteers with the opportunity to remove the meat from any harvested bison from the Park for themselves and/or to share with others.

Without congressional authorization, the Service has (1) the authority rather than the direct mandate to utilize members of the hunting community as volunteers; (2) the ability to postpone the planning necessary for this wildlife management effort; and (3) the opportunity to deprive volunteers from retaining the meat resulting from the cull. To address this last concern, H.R. 1443 and S.782 make it possible for volunteers to enjoy the harvested bison and engage in the sustainable use of these animals. In other programs in which the Service has utilized volunteers to reduce wildlife overpopulations, the Service has prohibited volunteers from retaining the meat from the animals they took, even though the Service allowed others to participate in lotteries for portions of the meat. In effect, the Service penalized the volunteers for participating. This legislation would remedy an inexplicable inequity in the volunteer process. Safari Club International strongly supports sustainable-use conservation and management involving the participation of members of the hunting community.

Using skilled public volunteers to cull the bison is a sound and workable solution to a wildlife management problem. The Service will be afforded an opportunity to better manage the overpopulated herd, while spending less money by using volunteer agents rather than hiring professional sharpshooters. The volunteers will be able to participate in a unique conservation opportunity and be able to take home the meat as an added benefit.

Safari Club International strongly supports H.R. 1443 and S. 782. If you require any additional information, please do not hesitate to contact Anna Seidman, Safari Club International's Director of Litigation at aseidman@safariclub.org or 202-543-8733.

Sincerely,

Craig Kaufman
President
Safari Club International