



**Summary of Comments
for the
Great Sand Dunes National Park and Preserve
Ungulate Management Plan and Environmental Impact Statement
Preliminary Draft Alternatives
Public Comment Period**

December 2014

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Appendix A – Copies of Correspondence Received

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DEFINITION OF TERMS

Key terms used in the analysis of and response to public comments as defined in PEPC are below.

- **Correspondence:** Any format of feedback received from the public.
- **Code:** Used to represent a topic or subject matter with which the public is concerned. A code is simply a way of organizing similar comments under one topic that represents specific subject matter.
- **Concern:** A statement that summarizes the voice of the public.
- **Comment:** Text selected from correspondence and coded to a particular topic or subject matter.

“The Public Comment and PEPC Step 7: Managing the Comment Analysis Process User Guide”. March 2008.

PEPC Glossary at <https://pepc.nps.gov/help/glossary.cfm>

ANALYSIS OF COMMENTS RECEIVED DURING THE PUBLIC SCOPING PERIOD

INTRODUCTION

On September 3, 2014, Great Sand Dunes National Park and Preserve and the National Park Service (NPS) released a public scoping newsletter for the Great Sand Dunes National Park and Preserve Ungulate Management Plan/Environmental Impact Statement (plan/EIS) for public review and comment. The public was invited to submit comments on the scope of the planning process, the range of preliminary alternatives, and issues to be considered when evaluating future bison and elk management. During the scoping period, two public scoping meetings were held:

- Tuesday, September 16, 2014, from 6:00 to 8:00 p.m. at the Baca Grande POA Meeting Hall, Crestone, Colorado
- Wednesday, September 17, 2014, from 6:00 to 8:00 p.m. at the Alamosa Recreation Center, Alamosa, Colorado

Correspondence received during the public comment period included letters and web forms submitted via the NPS Planning, Environment and Public Comment website (PEPC). The NPS received 17 unique correspondences (18 correspondences were received but two were duplicates), which were distilled into 76 individual comments. One correspondence was a petition that included 940 signatures. Because comments are not accepted on behalf of others, the petition is considered as one correspondence. A summary of the distribution of correspondence received is summarized in Table 1 through Table 4 below.

CODING OF COMMENTS

The NPS analyzed correspondence received regarding the Preliminary Draft Alternative Concepts to identify the topics that were of concern to the public. The correspondence was analyzed using the following steps:

- Aggregate and catalog correspondence using PEPC
- Analyze correspondence and extract individual comments
- Develop coding structure and assign codes to comments

The coding structure was designed to categorize comments based on responses to the four questions posed to the public in the Preliminary Draft Alternatives Newsletter.

Once the comment period closed, all correspondences were reviewed and each comment was assigned a code or codes from those listed in Table 1.

Reading and coding comments aided the NPS in summarizing public feedback regarding the preliminary alternative concepts. Feedback regarding additional alternatives or alternative elements, management tools under consideration and issues will assist in the preparation of the draft EIS.

ORGANIZATION OF COMMENTS

This report contains a summary of comments received regarding the Preliminary Draft Alternatives Newsletter. The comments are organized by the codes listed in Table 1 below. Correspondence received by type (i.e. web form or letter) are presented in Table 2. The distribution of organization types that commented are presented in

Table 3, and the distribution of correspondence received by state are presented in Table 4. All correspondences received originated in the United States. Following the tables, an index of all correspondence received by category and author is presented.

TABLE 1. COMMENT DISTRIBUTION BY CODE

Code	Description	Number of Comments
TQ1-61149	Is this a sufficient range of alternatives? If not, what other alternative(s) should the NPS consider?	15
TQ2-61149	Are there specific elements of the preliminary alternatives, including management tools, which should be changed? If yes, how would you change them?	14
TQ3-61149	What do you like and/or dislike about the preliminary alternatives?	12
TQ4-61149	What issues should the NPS consider when evaluating future bison and elk management?	16
TQ5-61149	Please include any additional comments you have regarding the Ungulate Management Plan/EIS.	6
TQ6-61149	Coordination with USFWS efforts on Baca NWR	7
Total use of codes		70
Total # of comments*		76

*The use of comments exceeds the number of codes because a single code can be associated with multiple comments.

TABLE 2. CORRESPONDENCE DISTRIBUTION BY CORRESPONDENCE TYPE

Correspondence Type	Number of Correspondences
Letter	4
Web Form	13
Total	17

TABLE 3. CORRESPONDENCE DISTRIBUTION BY ORGANIZATION TYPE

Organization Type	Number of Correspondences
Civic Groups	1
Conservation/Preservation	6
State Government	1
Unaffiliated Individual	9
Total	17

TABLE 4. CORRESPONDENCE DISTRIBUTION BY STATE

State	Number of Correspondences
CO	15
DC	1
MT	1
Total	17

INDEX OF CORRESPONDENCE BY TYPE OF AUTHOR

(See Table 1 for a description of codes.)

Each correspondence received identified by organization type based on what the author input in the PEPC system is shown below.

STATE GOVERNMENT

Colorado Parks and Wildlife – Correspondence #14

TQ1-61149, TQ2-61149, TQ3-61149, TQ4-61149

CIVIC GROUP

Habitat Partnership Program – Correspondence #15

TQ2-61149

CONSERVATION/PRESERVATION

Defenders of Wildlife, National Office – Correspondence #17

TQ1-43893, TQ4-43893

Defenders of Wildlife, Rockies and Plains Office – Correspondence #16

TQ1-43893, TQ2-61149, TQ4-43893, TQ6-61149

National Parks Conservation Association – Correspondence #8

TQ1-61149, TQ2-61149, TQ3-61149, TQ4-61149, TQ5-61149

San Luis Valley Ecosystem Council – Correspondence #11

TQ1-61149, TQ2-61149, TQ3-61149, TQ4-61149, TQ6-61149

The Nature Conservancy – Correspondence #9

TQ1-61149, TQ2-61149, TQ4-61149, TQ6-61149

The Wildlife Conservation Society – Correspondence #3

TQ1-61149, TQ2-61149, TQ3-61149, TQ4-61149, TQ5-61149

UNAFFILIATED INDIVIDUAL

9 correspondences were received from unaffiliated individuals.

SUMMARY OF CORRESPONDENCE

Concerns by Category:

Respondents indicated concern about the seeming lack of coordination between the planning efforts of the US Fish and Wildlife Service on the Baca National Wildlife Refuge and NPS. Seven respondents indicated concern over this issue.

Respondents indicated concern over genetic integrity in the bison herd. Seven respondents indicated concern over this issue.

Respondents indicated concern about the lack of natural predators with regards to reintroduction of bison. Seven respondents indicated concern over this issue.

Respondents indicated concern about limitations of the bison herd size presented in the preliminary alternatives. Seven respondents indicated concern over this issue.

Respondents indicated concern over the prohibition of public hunting in the park and/or Medano Ranch generally in response to NPS managed lethal removal of elk and/or bison. Six respondents indicated concern over this issue.

Respondents indicated interest in the potential opportunities for public education and involvement. Six respondents indicated concern over this issue.

Respondents indicated concern about the fencing, or containment in general, ranging from limitations in the range for a bison herd, maintenance of fencing, and effectiveness of containment measures. Six respondents indicated concern over this issue.

SUMMARY OF COMMENTS

Comments from agencies and organizations include the organization name below, if specified. Individual commenters are not identified by name.

Comments by code:

TQ1-61149 Is this a sufficient range of alternatives? If not, what other alternative(s) should the NPS consider?

Correspondence Id: 9 **Comment Id:** 402272

Comment Text: Range of Alternatives - We encourage NPS to expand the range of alternatives in the Draft Plan based on the options for bison management. As currently written, Alternatives 2 and 3 mix two issues related to bison - the origin of the population (existing herd vs. conservation herd) and the size of the range (within the existing fence vs. an expanded range). Alternative 2 currently includes the existing bison and the range within the existing fence, while Alternative 3 currently includes a conservation herd and an expanded range. Alternatives 2 and 3 could be broken out into a total of four alternatives based on bison (note that all alternatives still would involve comprehensive elk management): " Existing bison herd and existing range " Existing bison herd and expanded range " Conservation herd and existing range " Conservation herd and expanded range

Organization: The Nature Conservancy

Correspondence Id: 16 Comment Id: 402255

Comment Text: Defenders finds it somewhat arbitrary that the NPS would present a choice between continuing with the existing TNC herd at approximately the current stocking rate (approximately 400-1,000 head) or bringing in an outside herd at a much reduced number (200 head) to be managed at a much lower stocking rate of 100-400. There is no clear rationale why a conservation herd of outside animals could not be maintained at a much higher stocking rate, or why TNC animals could not be reduced to achieve a much lower stocking rate. These seem to be independent criteria that should be evaluated on their own merits. Defenders supports full ecological recovery of bison on grasslands that will support bison. The San Luis Valley bison landscape (comprised of the Baca NWR, GSDNP, and adjacent federal and private lands) is one of 25 important bison landscapes identified by Defenders and others (e.g., DOI 2014). Defenders would argue that the NPS should manage bison to achieve the highest stocking level possible subject to resource (forage) constraints, regardless of their origin. Second, Defenders, like most conservation organizations, has adopted the recommendations of the IUCN Bison Specialist Group, that concerns about cattle DNA introgression pose potential problems to the future of the wild bison genome in some instances. We therefore also applaud the NPS for considering replacement of potentially cattle-introgessed TNC bison. It may be a better strategy over the long term to go down this path than to discover at some point in the future that deleterious and non-adaptive cattle genes are interfering with bison reproductive success or physiological efficiency. Replacement to a non-introgessed standard may, over time, also result in more consistent management among DOI herds in general.

Organization: Rockies and Plains Office Defenders of Wildlife

Correspondence Id: 14 Comment Id: 402242

Comment Text: Is this a sufficient range of alternatives? If not, what other alternative(s) should the NPS consider? Currently the four proposed alternatives offer non-lethal hazing and lethal removal for dispersal by agency sharpshooters. The last three also include lethal removal for population management by agency sharpshooters. CPW believes that the strict adherence to a tiered approach is flawed as it does not take into account elk behavior. CPW understands NPS's desire to take a tiered approach, allowing time to see what happens and to see what is acceptable. However, our experience is that the reverse approach is actually effective. When using lethal removal early, the elk respond immediately and their dispersal behavior changes significantly. Non-lethal harassment is much more effective used in tandem with or immediately following lethal removal. It has been our experience that we can remove fewer animals if we begin lethal removal early. We suggest this should be added to your range of alternatives. Currently, the Medano Ranch is still in private ownership, where hunting has occurred. Hunting and harvest on the Medano Ranch is incredibly helpful in our ability to manage this elk herd. We suggest that allowing hunting to occur on the Medano Ranch (as long as it is in private ownership, up to and including the final closing if and/or when it sells) should be added to your range of alternatives.

Organization: Colorado Parks and Wildlife

Correspondence Id: 13 Comment Id: 401966

Comment Text: The only alternative missing is the one with a joint management plan for the entire 300,000 acre landscape that includes the Baca, Medano, and NPS lands.

Correspondence Id: 11 Comment Id: 401961

Comment Text: It is sufficient in terms of this DEIS, but it is unfortunate that predator populations will not be considered.

Organization: San Luis Valley Ecosystem Council

Correspondence Id: 10 Comment Id: 401957

Comment Text: yes

Correspondence Id: 8 Comment Id: 401952

Comment Text: Yes, but some important details have yet to be detailed that could change our support for preliminary alternatives. For instance, our organization is likely to support Alternative Concept C, but range size of a conservation herd is an important factor of this plan and is not detailed in the proposal. Similarly, we would only support a plan that incorporates a vigilant ongoing plan to introduce and maintain a brucellosis-free herd, and some of these plans are not yet laid out.

Organization: National Parks Conservation Association

Correspondence Id: 7 Comment Id: 401947

Comment Text: I believe there are a sufficient number of alternatives in the NPS plan. As a Coloradan, I strongly believe in bison reintroduction for the Great Sand Dunes National Park. I have visited this natural area 3 times over the past 4 years. While the scenery is spectacular and unique, I believe addition of bison to the ecosystem would enhance the visitation experience. Large ungulates always enhance the value of parks and add to the ecotourism value both in terms of experience and economic benefit to the local economy.

Correspondence Id: 6 Comment Id: 401938

Comment Text: Yes, this seems to be a sufficient (or excessive) range of alternatives.

Correspondence Id: 5 Comment Id: 401932

Comment Text: No, I think you missed an alternative by not having a "no bison/comprehensive elk" management alternative. In your public meetings and during conversations with park staff, it was noted that the historical occurrence of bison within the SLV was transient. You are trying to place a large hard to contain animal that is supposed to have been transient on a landscape that is not designed to have a permanent resident population. I recommend that you exclude the bison from all of the alternatives and focus on managing the elk population.

Correspondence Id: 4 Comment Id: 401925

Comment Text: While I support part of NPS's Alternative Concept 3, I firmly believe the agency can do more. NPS should aim for full ecological restoration of wild bison. I urge NPS to amend Concept 3 to include the option of increasing the population of wild bison to 1000 animals or more, consistent with resource capacity.

Correspondence Id: 3 Comment Id: 401794

Comment Text: We would suggest you Modify Alternative 3 and advance a full bison conservation option for ungulate management.

Organization: The Wildlife Conservation Society

Correspondence Id: 2 Comment Id: 401283

Comment Text: Yes. From my limited knowledge, it looks like many choices to consider.

Correspondence Id: 1 Comment Id: 389593

Comment Text: There are sufficient.

TQ2-61149 Are there specific elements of the preliminary alternatives, including management tools, which should be changed? If yes, how would you change them?

Correspondence Id: 11 Comment Id: 402278

Comment Text: Elk Management will be a key component of this Bison reintroduction effort and SLVEC initially supports the management tool options introduced in the newsletter. We understand that NPS does not

intend to carry forward predator introduction and we have a general understanding of the reasons why. However, we are compelled to say that humans cannot possibly replace other predators, like Wolves, because carnivore's of this nature carry an entire ecosystem with them regarding their interaction with other species on the landscape. The desired future habitat conditions that NPS will be identifying, highlighting and detailing in the DEIS, will most likely contain conditions that only predators like Wolves, reintroduced onto the landscape, would be able to create and perpetuate. It is unfortunate that we are not culturally ready to fully understand the benefits received by the reintroduction of Wolves into the Sangres and surrounding landscape. SLVEC believes reintroduction has the biological potential to bring health, vitality and some semblance of ecological balance back into this planning area. Perhaps by the time the next NPS Management Plan comes around, cultural barriers and tension will be eased and the reintroduction of a predator as significant as the Wolf will have the potential to become a reality. Just looking at this reintroduction of Predator from an economic perspective, we are now choosing instead to bring in sharp shooters on a "seasonal" basis, who will have to be paid, when we could have a mammal predator on the landscape working to bring balance 24/7. It's not just that wolves don't receive paychecks or pension, but their impact on the movement of herds, grasses and other flora, cannot be replicated by humans. The decision not to study the reintroduction of wolves and replace them with sharp shooters, is financially luxurious and only in a place like the United States, with it's complex, super imposing human infrastructure, could we get away with it, for now.

Organization: San Luis Valley Ecosystem Council

Correspondence Id: 9 **Comment Id:** 402276

Comment Text: Tools - Ensure consistent wording for elk management tools. For example, the terminology lethal take is used in Alternatives 2 and 3 but is described as limited lethal removal in the description of Elk Management Tools on page 4. Also, we recommend that the Park Service mimic predator and animal disease mortality in terms of sex ratio and age distribution when they conduct roundups and lethal removal.

Organization: The Nature Conservancy

Correspondence Id: 9 **Comment Id:** 402274

Comment Text: Range and fencing - Fencing should be done strategically to allow options in the future and make the best use of Park Service funding. The current language about constructing a fence on the western boundary is limiting and may preclude cooperative management with the Baca National Wildlife Refuge. A western boundary fence would prevent bison from ranging onto the Refuge. The Park Service should continue to work with the FWS on management that is in line with the original, long-term vision of this landscape as a single unit, instead of fragmenting conservation outcomes among ownerships. We therefore recommend modifying the language in the Draft Alternatives as follows: NPS may construct a new fence on the western boundary to retain bison on NPS land within the existing bison fence. The decision will depend upon negotiations with FWS, who are considering establishing a bison research area which may lie adjacent to NPS lands. NPS will discuss with FWS the possibility of cross-boundary management of a bison herd. We fully support the concepts in Alternative Concept 3 to expand bison range beyond NPS borders with willing neighbors on adjacent lands. The Nature Conservancy is willing to assist with this process.

Organization: The Nature Conservancy

Correspondence Id: 9 **Comment Id:** 402271

Comment Text: Plan Objectives - We suggest that the bison alternatives address the Plan Objective of Enhancing public awareness. The presence of a bison herd will provide an opportunity for NPS to enhance park visitor experiences and understanding of ecological processes through public tours or potentially drive-by opportunities to view the bison. A bison herd that is visible to visitors is also likely to increase park visitation. This is also consistent with the bison species conservation value of connection of people to nature envisioned by the Vermejo Statement (Sanderson et al., 2008, p. 263).

Organization: The Nature Conservancy

Correspondence Id: 9 Comment Id: 402270

Comment Text: Plan Objectives - For the draft plan, we encourage NPS to develop specific and quantitative objectives so that NPS will be able to demonstrate how the plan does or does not meet them. Our recommendation is to provide more specific examples of how the management tools being considered for each alternative will be used to address resource conditions. We also recommend that the Park Service explain further why certain management tools are not included for consideration in the plan.

Organization: The Nature Conservancy

Correspondence Id: 18 Comment Id: 402261

Comment Text: Elk Herd Management: I strongly support more aggressive elk herd management within the GSRA, including lethal take. The high population is taking a toll on archaeological sites on FS, USFWS and NPS lands in the territory. The lack of natural predators, soil and vegetation types, long term drought and climate change make it impossible to have elk numbers as they are today without severe impacts to the locals systems.

Correspondence Id: 18 Comment Id: 402260

Comment Text: I am support of the Alternative Concept 3: Conservation Herd/Comprehensive Management with a few additional thoughts: Semi-free ranging bison population: I believe it would be optimal to have a rather small conservation herd (>200) given the soils, vegetation types, potential for long term drought, and climate change. Evidence is lacking, but my sense is that bison were not in the San Luis Valley in great numbers as they were in the other mountain parks such as North, Middle and South Parks. My experience doing archaeology in parks to the north suggest a much larger population there given the remains one still finds on the ground. The paucity of written accounts of Valley bison and actual skeletal remains suggest perhaps they wandered the vast valley in small numbers; avoiding the wetlands and often migrating between the Rio Grande and Gunnison watersheds. A lack of natural predators and a continued decrease in federal funding to the Parks may make it very difficult to adequately manage a larger population in a confined area. The herd would need to be moved frequently in order that archaeological sites are not destroyed; especially those around the artesian springs. That all said, a conservation herd may be useful for maintaining a rich genetic pool of native bison in North America, eradicating weeds, and providing a memorable experience to visitors. Tribes that maintain cultural affiliation to the San Luis Valley have also expressed interest in receiving bison meat or parts in the event of a take and have also expressed interest in the take themselves. Several Tribes in the west are well versed in managing their own bison herds in the west (Northern Ute, Lakota). The NPS would need to authorize adequate funding to manage such a herd at the GSRA. The land Between the Lakes Forest service Demonstration Unit also runs a small herd of bison, some of which it auctions off to help off-set the cost of management.

Correspondence Id: 17 Comment Id: 402258

Comment Text: I, therefore, support full ecological restoration of wild bison on the Baca National Wildlife Refuge and in the Great Sand Dunes National Park, as well as connectivity between the two via purchase of key lands from the Nature Conservancy, which is consistent with the purposes of the Refuge and the Park. To this end, I urge the NPS to amend Alternative Concept 3 to include the option of increasing the population of bison to 400-1,000 (or more), consistent with resource capability, and for the FWS to adaptively manage, rather than experiment, with a bison population consistent with that target.

Organization: Defenders of Wildlife

Correspondence Id: 16 Comment Id: 402256

Comment Text: Fencing As we discussed above, managing this herd separately from any herd established on the Baca NWR seems ludicrous given the obvious linkages between environmental elements and the current

management regime of bison on the Medano Ranch . . . therefore the need for a fence along the western boundary of the Park is unneeded and unwarranted. Based on our comments, we cannot describe the area of adjacent NPS lands that might warrant a fence along the western border of the Park. Indeed, this seems to be an ideal question that would be better suited to a joint management plan that took into account preferred bison habitats and obvious connectivity between preferred bison habitats. Second, Defenders recommends that any fencing used in the park to confine bison should be permeable to other wildlife. Defenders has worked extensively with a number of Tribes and others on bison containment, and can provide numerous examples and specifications for wildlife-friendly bison fencing. Defenders will not support any alternative that envisions bison separated from other wildlife by an impermeable fence. Public access While Concept 3 discusses public viewing of bison, and fencing will be done to maximize access to the bison to the Park, it's important to note that many wildlife refuges and National Parks have bison present on the landscape and public hiking trails, drive-through roads, pullouts, picnic tables, campgrounds and so forth exist within areas where bison are also present on the landscape. With few exceptions, most due to poorly policed human behavior, are there any negative interactions between people and bison. Defenders therefore supports keeping bison access open to the public. Separating wildlife from people via a fence simply reinforces misconceptions about the bison as wildlife. Opportunities for viewing bison without being separated by a barrier

Organization: Rockies and Plains Office Defenders of Wildlife

Correspondence Id: 15 **Comment Id:** 402246

Comment Text: Mount Blanca HPP is supportive of the NPS plan to establish an active elk management plan which meets the population objectives established by Colorado Parks and Wildlife. Given the current elk population within the GSD Park, lethal take as a population reduction arrangement should be strongly considered as well as elk dispersal plans. Regarding the next few years to develop and implement an elk management plan Mount Blanca HPP would like for GSD to consider re-establishing elk hunting on Nature Conservancy Land within the Park. Even with a small amount of hunting within the Park it will help to keep elk population in check and allow for distribution of elk where harvest may be achieved within the regular elk seasons. At this time the Mount Blanca HPP has no comment regarding bison management.

Organization: Habitat Partnership Program

Correspondence Id: 14 **Comment Id:** 402243

Comment Text: Are there specific elements of the preliminary alternatives, including management tools, which should be changed? If yes, how would you change them? Please see previous comments with regard to dispersal techniques and hunting the Medano Ranch. Wilderness - CPW normally supports wilderness designations for remote, high elevation areas where elk do not congregate, except during the summer months, and are most often forced out as snow begins to accumulate. Wilderness designation on elk winter range creates an entirely different situation. In the context of the Great Sand Dunes National Park, elk could congregate in the area proposed for wilderness and find refuge from hunters or agency personnel. A minimum tools analysis would need to be done for agency personnel to conduct management actions, and the inability to use certain tools could severely hinder CPW's ability to effect management. This is especially true when time is of the essence to address a serious wildlife conflict or management situation. For the most flexibility for elk management, CPW recommends no wilderness designation or completion of a minimum tools analysis up-front to ensure that CPW staff have the ability to manage big game efficiently and without additional fiscal burdens.

Organization: Colorado Parks and Wildlife

Correspondence Id: 13 **Comment Id:** 401970

Comment Text: Comment 1: I favor Alternative Concept 3 because it supports the directive from our Leadership in DOI on the DOI Bison Conservation Initiative (Department of Interior 2014). I applaud the National Park Service and Great Sand Dunes National Park specifically for having a broad conservation vision, and being willing to support bison conservation and the goals of DOI. However I have concerns about the

limitations on the number of bison in that alternative. What science is it based on? Gross and Wang (2005) clearly state that a minimum viable population for genetic conservation would be 1000 animals, so I don't understand why NPS would limit the herd size to 400. According to the Bison Conservation Initiative report (Dratch and Gogan 2010): "The participants established the criteria for a wild bison herd as one with a large enough population size to prevent loss of genetic variation and with low levels of cattle or subspecies introgression, and subject to some of the forces of natural selection, including competition for breeding opportunities. The desired minimum size of a population to maintain genetic variation in bison over two centuries is estimated at 1,000 individuals (Gross and Wang 2005, Gross et al. 2006, Boyd et al. 2010). This could be achieved through establishment of a single population or management of several smaller populations as a metapopulation." Also, in Boyd (2003) the minimum population size for a viable population was suggested to be 400 individuals. Yet 400 is the maximum number of bison listed in Alternative Concept 3. What is the number 400 based on? I think the habitat condition should guide your management, and clearly if the habitat is stressed, managers will want to respond with appropriate adaptive management. However, the carrying capacity of the landscape has been established to be much larger (Wockner et al. 2014), so what is the justification for limiting the size to 400?

Correspondence Id: 13 **Comment Id:** 401967

Comment Text: I think you did a great job of articulating that NPS will manage elk in a step-wise fashion, starting with milder treatments and progressing to culling if needed. It would really anger your NPS constituency if GRSA is opened to hunting.

Correspondence Id: 10 **Comment Id:** 401958

Comment Text: I think limited, controlled hunting of elk inside the park would be beneficial and could save resources if staff or hired contractors did not have to haze them on to adjacent land.

Correspondence Id: 8 **Comment Id:** 401953

Comment Text: Management tools for bison are not well defined.

Organization: National Parks Conservation Association

Correspondence Id: 7 **Comment Id:** 401948

Comment Text: Since the USFWS has similar plans to reintroduce a wild bison herd to the San Luis Valley National Wildlife Refuge, I would urge the NPS to combine their efforts with the USFWS and develop a common bison management plan that would allow the bison to have a larger area to range. This combined management effort would also lend strength to the program and benefit the bison over the long term.

Correspondence Id: 6 **Comment Id:** 401939

Comment Text: I don't know what management tools should be changed, if any, if you are already using them and they are working. The range of alternatives will require expansion of staff to manage the already diverse aspects of running a park and adding a previously managed herd of bison along with elk "management" (which is not really management if you consider ranching management of cattle and sheep as an effective form of management, which does not allow dispersal by hazing onto other people's property or onto public lands.) Don't create jobs for more folks when staffing under current federal economics is already stretched to the limits.

Correspondence Id: 5 **Comment Id:** 401933

Comment Text: The elk population has persisted throughout time in the area and is at way over the recommended CPW herd population numbers. Because of the high elk densities and the refuge status of the NP, the elk herd is causing un-repairable damage to riparian and upland habitat types. The park personnel focus on/and maintain that it is an elk distribution problem and refuses to admit that there are too many elk on the landscape. We all know that elk are a very mobile and resilient creature and the only way to manage elk

distribution is with lethal methods. I would like to see a lethal elk management strategy timed to coincide with outside hunting seasons. This would keep the animals on the move and expose them to additional, off the NP hunting pressure. For this to be effective it must be maintained for several days, as short bursts of activity without follow-up are ineffective as the elk will return within 24 hours. Hazing is mentioned as the initial response to elk distribution problems. In an environment of shrinking budgets and additional demands on park personnel it is unrealistic that the park can maintain any effective changes in distribution of the elk population with this as the first wave of management. Also it is mentioned several times in the alternatives that dogs will or can be used to haze the animals. I do not recommend this, as it is a direct violation of CPW rules and regulations and is a very unacceptable management strategy to most people that manage the elk resource.

Correspondence Id: 3 Comment Id: 401795

Comment Text: We recommend a modified Alternative 3 that will maximize the conservation efforts for American Bison while protecting other natural resources in the area. Specifically we would ask for an expanded geography for bison to roam and minimal fencing to give bison access to the resources at large scale. Enabling bison to range as widely as possible across these conservation lands will increase the ecological influence they could express and maximize their functionality in this ecosystem. We believe that by doing so NPS may greatly benefit other species and better emulate the natural processes that accompany grazing as a natural ecological force.

Organization: The Wildlife Conservation Society

TQ3-61149 What do you like and/or dislike about the preliminary alternatives?

Correspondence Id: 18 Comment Id: 402260

Comment Text: I am support of the Alternative Concept 3: Conservation Herd/Comprehensive Management with a few additional thoughts: Semi-free ranging bison population: I believe it would be optimal to have a rather small conservation herd (>200) given the soils, vegetation types, potential for long term drought, and climate change. Evidence is lacking, but my sense is that bison were not in the San Luis Valley in great numbers as they were in the other mountain parks such as North, Middle and South Parks. My experience doing archaeology in parks to the north suggest a much larger population there given the remains one still finds on the ground. The paucity of written accounts of Valley bison and actual skeletal remains suggest perhaps they wandered the vast valley in small numbers; avoiding the wetlands and often migrating between the Rio Grande and Gunnison watersheds. A lack of natural predators and a continued decrease in federal funding to the Parks may make it very difficult to adequately manage a larger population in a confined area. The herd would need to be moved frequently in order that archaeological sites are not destroyed; especially those around the artesian springs. That all said, a conservation herd may be useful for maintaining a rich genetic pool of native bison in North America, eradicating weeds, and providing a memorable experience to visitors. Tribes that maintain cultural affiliation to the San Luis Valley have also expressed interest in receiving bison meat or parts in the event of a take and have also expressed interest in the take themselves. Several Tribes in the west are well versed in managing their own bison herds in the west (Northern Ute, Lakota). The NPS would need to authorize adequate funding to manage such a herd at the GSRA. The land Between the Lakes Forest service Demonstration Unit also runs a small herd of bison, some of which it auctions off to help off-set the cost of management.

Correspondence Id: 14 Comment Id: 402244

Comment Text: What do you like and/or dislike about the preliminary alternatives? CPW appreciates the cooperation and coordination that has occurred in the development of these alternatives. They clearly reflect the on-going effective communication between our agencies.

Organization: Colorado Parks and Wildlife

Correspondence Id: 13 **Comment Id:** 401968

Comment Text: I don't like that FWS is getting part of the Medano. I think NPS should purchase all of it. NPS has a conservation vision for this amazing landscape. FWS apparently does not, judging from their CCP.

Correspondence Id: 11 **Comment Id:** 401963

Comment Text: The alternatives are human centered, but sufficient.

Organization: San Luis Valley Ecosystem Council

Correspondence Id: 10 **Comment Id:** 401959

Comment Text: I like the plan for removing the cow-bison animals and bringing in a small population of genetically pure American Bison from the few existing herds in the country in order to begin a new herd and assist in the genetic diversity of this American icon. I like the proactive management/thinning of the elk population to secure the health of the herd and the habitat in the absence of natural predators. I would like the reintroduction of natural predators to be a possibility.

Correspondence Id: 8 **Comment Id:** 401954

Comment Text: Alternatives 1-3 acknowledge the ecological contributions of bison to the GRSA landscape and the importance of maintaining herds of these native animals in the park. We also appreciate that these alternatives consider the relationship between populations of large, grazing ungulates on one another and strive to maintain a balance between them. We prefer Alternative 3 because we feel that the introduction of a conservation herd with stronger genetic integrity is more consistent with the DOI's and NPS' bison conservation objectives, and because we feel that fostering more genetic integrity in a Western American bison population will benefit the species in the long-term.

Organization: National Parks Conservation Association

Correspondence Id: 7 **Comment Id:** 401949

Comment Text: See response to question 2. Also, I believe that the agency should move forward more rapidly and reintroduce bison to the Sand Dunes ecosystem.

Correspondence Id: 6 **Comment Id:** 401940

Comment Text: I like the Alternative Concept 1: no bison/active elk management multi-species management (adding bison) requires added managers with expertise in handling, upkeep of facilities for handling, and marketing or culling the herds. The recent 15 years of drought have caused elk to overrun private ranchlands and herd size is not being effectively managed. Feed issues have been a problem so elk herd size needs attention before taking on any new stuff.

Correspondence Id: 5 **Comment Id:** 401934

Comment Text: I like to see that the National Park service is attempting to actively manage the wildlife resources on their parks and have realized that a hands-off approach on the limited landscapes that they manage, impacts more than just the park itself.

Correspondence Id: 4 **Comment Id:** 401926

Comment Text: The proposed bison population levels and management area are not adequate or sustainable. Numbers and acreage should be increased, in cooperation with the Baca National Wildlife Refuge and the U.S. Fish & Wildlife Agency.

Correspondence Id: 3 **Comment Id:** 401796

Comment Text: WCS dislikes the small vision for the ranging of genetically reputable bison. Small ball at this stage will not advance the conservation of the species. Expanding the range of bison in a modified Alternative 3 will also enable greater opportunity for public hunting. Lessons from Yellowstone National Park illustrate the importance of having a large landscape available for hunting to optimize the use of this important tool as a population regulation method. To cluster hunting into small acreages is not desirable and can cause harm to the image of this harvest method while increasing safety risks to hunters.

Organization: The Wildlife Conservation Society

Correspondence Id: 2 **Comment Id:** 401284

Comment Text: I like that GRSA proposes to manage these elk & bison herds, in any form of range management. They will continue to grow, roam, and migrate, regardless of set boundaries. I like that GRSA would not consider introducing wolves- bad idea. I like the adaptive management concept, so that future changes could be made, if needed. I don't like the lethal shooting to manage an elk or bison herd; I would prefer public hunting to harvest the meat, and allow for sportsman to hunt. I like having a Round-Up for translocation (see comment below). I don't like introducing any more bison. You have enough animals to manage without introducing more of them. I question the fencing; bison migrate during storms regardless of boundaries.

TQ4-61149 What issues should the NPS consider when evaluating future bison and elk management?

Correspondence Id: 8 **Comment Id:** 402284

Comment Text: Employ Brucellosis Quarantine as a Tool for Maintaining a Disease-Free Herd NPCA cannot underscore enough the importance that any bison herd at GRSA, whether derived from wild or domesticated stock, be tested and regularly demonstrated to be free of brucellosis, a disease caused by a non-native bacteria likely introduced into the bison population by cattle. Brucellosis increases the incidence of stillbirth and non-viable calves in bison and other ungulate populations. Up to two-thirds of the wild bison population in the U.S. is infected with the disease. As a result of concerns about high infection rates in the Greater Yellowstone (GYA) population in particular, the Interagency Bison Management Plan for the State of Montana introduced the brucellosis quarantine protocol as a tool for separating and safely transferring uninfected bison to other lands for species conservation purposes. While the quarantine protocol has yet to be formally adopted and some questions about it have yet to be resolved, it raises the possibility of introducing bison that have been tested to be seronegative for brucellosis into GRSA, and to implement management practices that would keep a GRSA herd free of the disease in the future.

Organization: National Parks Conservation Association

Correspondence Id: 11 **Comment Id:** 402279

Comment Text: Elk Management will be a key component of this Bison reintroduction effort and SLVEC initially supports the management tool options introduced in the newsletter. We understand that NPS does not intend to carry forward predator introduction and we have a general understanding of the reasons why. However, we are compelled to say that humans cannot possibly replace other predators, like Wolves, because carnivore's of this nature carry an entire ecosystem with them regarding their interaction with other species on the landscape. The desired future habitat conditions that NPS will be identifying, highlighting and detailing in the DEIS, will most likely contain conditions that only predators like Wolves, reintroduced onto the landscape, would be able to create and perpetuate. It is unfortunate that we are not culturally ready to fully understand the benefits received by the reintroduction of Wolves into the Sangres and surrounding landscape. SLVEC believes reintroduction has the biological potential to bring health, vitality and some semblance of ecological balance back into this planning area. Perhaps by the time the next NPS Management Plan comes around, cultural barriers and tension will be eased and the reintroduction of a predator as significant as the Wolf will have the potential to become a reality. Just looking at this reintroduction of Predator from an economic perspective, we are now choosing instead to bring in sharp shooters on a "seasonal" basis, who will have to be paid, when we

could have a mammal predator on the landscape working to bring balance 24/7. It's not just that wolves don't receive paychecks or pension, but their impact on the movement of herds, grasses and other flora, cannot be replicated by humans. The decision not to study the reintroduction of wolves and replace them with sharpshooters, is financially luxurious and only in a place like the United States, with its complex, super imposing human infrastructure, could we get away with it, for now.

Organization: San Luis Valley Ecosystem Council

Correspondence Id: 9 Comment Id: 402275

Comment Text: General - We fully support comprehensive elk herd management and the creation of a specific plan with herd size targets. We support the reduction of the elk herd as a restoration strategy since natural predators and predation have been eliminated or reduced. Elk are currently consuming a large portion of the available forage and therefore having some impacts on vegetation that are not likely to have occurred pre-historically. Finally, reduction in elk numbers would be a key step to the maintenance of a restoration/conservation herd of bison, reducing resource conflicts that are a result of inflated numbers of elk (Schoenecker 2012). As elk have been successfully restored in Colorado, bison have no conservation herds in Colorado.

Organization: The Nature Conservancy

Correspondence Id: 9 Comment Id: 402273

Comment Text: Herd Genetics and Size - We understand the NPS's interest in establishing a conservation herd based on objectives of the DOI Bison Conservation Initiative and we support the goal of a conservation herd as a key contribution at the continental scale. If the Sand Dunes are considered a location that is important to the North American strategy for a conservation herd, the plan should establish a restoration goal that can be achieved over time through adaptive management. Such a goal should strongly consider the paper by Wang and Gross (2005), which recommends a herd size of at least 1,000 animals as sufficient for the long-term management for genetic viability. The Bison Conservation Initiative also states that, Maintaining or creating herds or metapopulations in excess of 1,000 animals is considered as likely essential to the long-term genetic viability of individual bison within the herds (Bison Conservation Initiative, p.9). Additional reasoning for using a viable/sustainable number of bison is that it would assure that the herd would be buffered against future problems of off-site herd availability, challenging politics or policy, and concerns about the introduction of other problems. As an alternative, if a herd of 1,000 animals with no detectable bovine alleles is not feasible, we urge NPS to use the existing TNC herd because: 1) it has a high representation of bison genetic diversity, 2) the herd is in place, knows the landscape, and there are few issues with bison breaking through fence, 3) there is broad, local acceptance of current TNC herd in the San Luis Valley, and 4) the herd has a very low level of detected bovine genetic material and is being improved through management on the Medano Ranch. Regarding herd size, we would encourage NPS to consider recent research and to identify quantitative resource objectives, such as for species composition and density, in order to determine carrying capacity. Forthcoming research shows that the NPS lands alone can support a herd of up to 1,000 bison. If the Baca Refuge allowed for bison, a herd of up to 3,500 would be possible (Schoenecker et al., In Press). We also encourage NPS to describe the composition of the herd in the draft plan, considering age and gender. We would be happy to work with NPS on determining an optimal herd composition if that would be helpful.

Organization: The Nature Conservancy

Correspondence Id: 18 Comment Id: 402261

Comment Text: Elk Herd Management: I strongly support more aggressive elk herd management within the GSRA, including lethal take. The high population is taking a toll on archaeological sites on FS, USFWS and NPS lands in the territory. The lack of natural predators, soil and vegetation types, long term drought and climate change make it impossible to have elk numbers as they are today without severe impacts to the local systems.

Correspondence Id: 18 Comment Id: 402260

Comment Text: I am support of the Alternative Concept 3: Conservation Herd/Comprehensive Management with a few additional thoughts: Semi-free ranging bison population: I believe it would be optimal to have a rather small conservation herd (>200) given the soils, vegetation types, potential for long term drought, and climate change. Evidence is lacking, but my sense is that bison were not in the San Luis Valley in great numbers as they were in the other mountain parks such as North, Middle and South Parks. My experience doing archaeology in parks to the north suggest a much larger population there given the remains one still finds on the ground. The paucity of written accounts of Valley bison and actual skeletal remains suggest perhaps they wandered the vast valley in small numbers; avoiding the wetlands and often migrating between the Rio Grande and Gunnison watersheds. A lack of natural predators and a continued decrease in federal funding to the Parks may make it very difficult to adequately manage a larger population in a confined area. The herd would need to be moved frequently in order that archaeological sites are not destroyed; especially those around the artesian springs. That all said, a conservation herd may be useful for maintaining a rich genetic pool of native bison in North America, eradicating weeds, and providing a memorable experience to visitors. Tribes that maintain cultural affiliation to the San Luis Valley have also expressed interest in receiving bison meat or parts in the event of a take and have also expressed interest in the take themselves. Several Tribes in the west are well versed in managing their own bison herds in the west (Northern Ute, Lakota). The NPS would need to authorize adequate funding to manage such a herd at the GSRA. The land Between the Lakes Forest service Demonstration Unit also runs a small herd of bison, some of which it auctions off to help off-set the cost of management.

Correspondence Id: 17 Comment Id: 402259

Comment Text: As a Coloradan, I urge the National Park Service (NPS) and the U.S. Fish and Wildlife Service (FWS) to collaborate on establishing a publicly owned herd of wild, wide-ranging bison on the Baca National Wildlife Refuge and in the Great Sands Dunes National Park. This is a great opportunity to bring two Department of Interior agencies together to help restore our wildlife legacy. I support in part the FWS_ Alternative B2 and the NPS Alternative Concept 3, to the extent that they create habitat for bison on Refuge and Park lands. Together, these proposals would create thousands of acres of habitat for publicly-owned wild bison and opportunities for Coloradans to experience bison at a scale that would be an inspiring wildlife spectacle. However, both agencies must do more. The FWS proposal to study bison for five to ten years ignores the fact that bison on a nearby Nature Conservancy property have provided ample experience on how bison will use this habitat, and we believe the FWS can move much more quickly to expand habitat for wild bison. Additionally, the NPS should aim for full ecological restoration of wild bison, not settle on an arbitrary choice of either high-density domestic bison or low-density wild bison. Furthermore, I hope that the Park and Refuge will not maintain separate herds but instead jointly manage a larger herd that can roam across a larger area. Maintaining two separate herds and two separate management programs seems not only an incredible waste of public resources but also of an opportunity to demonstrate to the public that federal agencies can cooperate for the greater good.

Organization: Defenders of Wildlife

Correspondence Id: 16 Comment Id: 402257

Comment Text: The NPS should articulate its strategy for maintaining population targets for bison. This has proven to be controversial in some Park units, but amazingly uncontroversial in others. Defenders believes that the public will be more supportive of future management actions if it knows and is willing to buy into population regulation strategies that are developed as part of a reintroduction plan. Again, if this plan is developed with other key landowners in bison management, there may be a wider range of alternatives for managing bison surpluses than the Park is able to do on its own. Defenders suggests that the NPS consider the

following: - Introduce small conservation bison herd of outside origin (e.g., 25-1 00) - Bison introduced would report negative for diseases of regulatory concern - Work with the FWS to create a management plan that integrates bison management on both jurisdictions - Expand bison fencing to maximize bison range on NPS land during the life of the plan - Bison managed within a population range as resource conditions allow (e.g., 400-1,000) - Minimum human handling/intervention except as needed to protect resources - Potential to expand bison range beyond NPS borders with willing neighbors on adjacent lands - Develop interpretation/ education opportunities along Alamosa County Road Lane 6 North (e.g., vehicle pullouts) and public access trails.

Organization: Rockies and Plains Office Defenders of Wildlife

Correspondence Id: 14 **Comment Id:** 402245

Comment Text: What issues should the NPS consider when evaluating future bison and elk management? Elk and bison are both large ungulates that can impact habitats significantly. Elk also have the capability of rapid population growth under some conditions. This population of elk exhibits low calf recruitment, which may slow or limit population growth somewhat. However, this elk herd is significantly over population objectives. While the landscape may appear able to sustain significantly more grazing, there are large tracts of land that are not utilized by elk or bison. Elk and bison have "preferred habitats" that they are reluctant to leave, often until the habitat is over utilized or damaged.

Organization: Colorado Parks and Wildlife

Correspondence Id: 13 **Comment Id:** 401969

Comment Text: Don't be afraid to manage both elk and bison on this landscape. It's not going to be that difficult.

Correspondence Id: 11 **Comment Id:** 401964

Comment Text: Predators.

Organization: San Luis Valley Ecosystem Council

Correspondence Id: 10 **Comment Id:** 401960

Comment Text: I think the key issue is to attempt to return the habitat to its most natural state while maintaining areas for controlled public enjoyment before the chance to preserve this sizable area is lost.

Correspondence Id: 8 **Comment Id:** 401955

Comment Text: Ensuring close monitoring of both populations (and their relationship with other ungulates in the park, such as deer and pronghorn) to ensure that species conservation and other ecological goals are being met will be critical. We feel that, should Alternative 3, or any other alternative that incorporates bison into the park, should include a vigilant approach to ensuring a herd free of brucellosis. Additionally, we cannot underscore enough the importance of maintaining close collaboration with public, private and tribal stakeholders, and providing opportunities for meaningful input in NPS' adaptive management bison on an ongoing basis.

Organization: National Parks Conservation Association

Correspondence Id: 7 **Comment Id:** 401950

Comment Text: At some point, bison (and elk) will achieve numbers that might be considered to be in excess of what the ecosystem can provide. A hunt ultimately is chosen to "manage" such herds in the absence of natural carnivores. Therefore, I believe some upper limits should be included in the plan in terms of striking a need to cull the herds or open the areas to hunting. This part of the plan should be stated up front so as to let the public know that there is an upper limit to the proposed size of the herd. RMNP has dealt with this issue for 100 years and has had a lot of bad publicity in terms of not knowing when or how to manage their elk herd.

Correspondence Id: 6 Comment Id: 401941

Comment Text: You are not responsible for creating a three-ring circus (wider spectrum for public interest): the Sand Dunes, Medano Creek, archeology, educational programs, and visitor center with other features already provided is enough. Drop the bison. The elk have already displaced populations of deer in the past 35 years, let's try to restore some balance.

Correspondence Id: 5 Comment Id: 401935

Comment Text: I would like to see the park accept that they are a land management agency and see them manage park landscapes to preserve the wildlife diversity on those landscapes. This means utilize all of the current tools to conserve wildlife habitats and not just take a preservationist, no management, view on natural processes. I would like to see a more liberal view on the use of natural ignition fires and additional forest management that mimics pre-European settlement of the area.

Correspondence Id: 4 Comment Id: 401927

Comment Text: This plan offers an opportunity for the NPS and FWS to work together, jointly managing a larger, more sustainable herd across both the wildlife refuge and national park.

Correspondence Id: 3 Comment Id: 401797

Comment Text: We also encourage inviting the suitable tribal partners in the region to consult and engage the decision process and future management of ungulates. Tribal partners can bring a sense of relationship and respect to the management of bison resources. In addition, they may be offered harvest opportunities to help with population regulation while enriching their cultural connection to the species. The need for large places where more than 1000 bison can roam to enrich and inspire human cultures is very important to the ecological future of this species

Organization: The Wildlife Conservation Society

Correspondence Id: 2 Comment Id: 401285

Comment Text: Has NPS inquired with the South Dakota, Custer State Park about their annual Bison "Buffalo Round-Up" every September. Some of the bison herd is auctioned-off to ranchers. I believe then, they either continue to raise, or harvest this meat for market. You would have to find out their process. It has been very successful for managing the bison herd. Has the NPS determined the acreage needed for grazing for the elk and bison? How many elk, and bison, can be supported on this acreage proposed? Once determined, does the NPS have the resources, both financially and man-power to care for these herds annually? Why cannot the elk herds be transplanted? Is this not a viable way to cull the herd without killing them? If not, then why not allow public hunting for a more 'ethical' approach rather than 'lethal removal' (If I read this correctly, I am not hearing any harvest of the meat.) At least, a public hunt; then use sharp shooters only if the herd is obviously too large.

Correspondence Id: 1 Comment Id: 389594

Comment Text: Consider that the natural predators are gone so reintroducing bison would be detrimental to the area.

TQ5-61149 Please include any additional comments you have regarding the Ungulate Management Plan/EIS.

Correspondence Id: 17 Comment Id: 402259

Comment Text: As a Coloradan, I urge the National Park Service (NPS) and the U.S. Fish and Wildlife Service (FWS) to collaborate on establishing a publicly owned herd of wild, wide-ranging bison on the Baca National Wildlife Refuge and in the Great Sands Dunes National Park. This is a great opportunity to bring two

Department of Interior agencies together to help restore our wildlife legacy. I support in part the FWS Alternative B2 and the NPS Alternative Concept 3, to the extent that they create habitat for bison on Refuge and Park lands. Together, these proposals would create thousands of acres of habitat for publicly-owned wild bison and opportunities for Coloradans to experience bison at a scale that would be an inspiring wildlife spectacle. However, both agencies must do more. The FWS proposal to study bison for five to ten years ignores the fact that bison on a nearby Nature Conservancy property have provided ample experience on how bison will use this habitat, and we believe the FWS can move much more quickly to expand habitat for wild bison. Additionally, the NPS should aim for full ecological restoration of wild bison, not settle on an arbitrary choice of either high-density domestic bison or low-density wild bison. Furthermore, I hope that the Park and Refuge will not maintain separate herds but instead jointly manage a larger herd that can roam across a larger area. Maintaining two separate herds and two separate management programs seems not only an incredible waste of public resources but also of an opportunity to demonstrate to the public that federal agencies can cooperate for the greater good.

Organization: Defenders of Wildlife

Correspondence Id: 7 **Comment Id:** 401951

Comment Text: See response to question 4. As stated, my impression upon travelling around most of Colorado is that there are millions of acres that could have large ungulate populations but do not. This, I believe is a result of over-hunting and poor management of these species across Colorado, making it impossible to establish permanent populations of wildlife. It is time for wildlife management in Colorado to accept that ecotourism and the value of viewing wildlife in the state trumps the value from hunting. Therefore, I strongly support reintroduction of wildlife in the state.

Correspondence Id: 6 **Comment Id:** 401942

Comment Text: Fencing is expensive and requires upkeep. The Great Sand Dunes is not a zoo.

Correspondence Id: 3 **Comment Id:** 401798

Comment Text: You will be more likely to succeed in the conservation program for bison if you think at large scale and consider what ecological role bison may play in the future of this landscape. To repeat the mistaken strategy of keeping bison strictly confined in small spaces will be a tragedy. Few opportunities arise in the temperate grasslands, mountain valley and steppe habitats for a large scale restoration of bison...this is a great chance to advance that vision. This idea is consistent with the state objectives of the DOI bison report that was just released this past summer and consistent with the guidelines of the IUCN bison specialist group.

Organization: The Wildlife Conservation Society

Correspondence Id: 2 **Comment Id:** 401286

Comment Text: Again, I encourage the NPS to speak with other agencies, namely, Custer State Park, South Dakota, to learn how they manage their bison herd. As for the elk, if they become over-populated there is a good chance they will become diseased, and die-off naturally. No matter what means are determined to cull the herd, remain open to changing management practices in the future. I think that wildlife biologists, and wildlife management teams in other states, other local and regional agencies are your best resource for gathering input on how to manage these herds.

TQ6-61149 Coordination with USFWS efforts on Baca NWR

Correspondence Id: 17 **Comment Id:** 402283

Comment Text: As a Coloradan, I urge the National Park Service (NPS) and the U.S. Fish and Wildlife Service (FWS) to collaborate on establishing a publicly owned herd of wild, wide-ranging bison on the Baca National Wildlife Refuge and in the Great Sands Dunes National Park. This is a great opportunity to bring two

Department of Interior agencies together to help restore our wildlife legacy. I support in part the FWS Alternative B2 and the NPS Alternative Concept 3, to the extent that they create habitat for bison on Refuge and Park lands. Together, these proposals would create thousands of acres of habitat for publicly-owned wild bison and opportunities for Coloradans to experience bison at a scale that would be an inspiring wildlife spectacle. However, both agencies must do more. The FWS proposal to study bison for five to ten years ignores the fact that bison on a nearby Nature Conservancy property have provided ample experience on how bison will use this habitat, and we believe the FWS can move much more quickly to expand habitat for wild bison. Additionally, the NPS should aim for full ecological restoration of wild bison, not settle on an arbitrary choice of either high-density domestic bison or low-density wild bison. I, therefore, support full ecological restoration of wild bison on the Baca National Wildlife Refuge and in the Great Sand Dunes National Park, as well as connectivity between the two via purchase of key lands from the Nature Conservancy, which is consistent with the purposes of the Refuge and the Park. To this end, I urge the NPS to amend Alternative Concept 3 to include the option of increasing the population of bison to 400-1,000 (or more), consistent with resource capability, and for the FWS to adaptively manage, rather than experiment, with a bison population consistent with that target. Furthermore, I hope that the Park and Refuge will not maintain separate herds but instead jointly manage a larger herd that can roam across a larger area. Maintaining two separate herds and two separate management programs seems not only an incredible waste of public resources but also of an opportunity to demonstrate to the public that federal agencies can cooperate for the greater good. Thank you for the opportunity to comment and for this fantastic opportunity to grow a very special conservation herd of bison in a restored grassland of North America.

Organization: Defenders of Wildlife

Correspondence Id: 16 **Comment Id:** 402282

Comment Text: Defenders requests the Park Service and Fish and Wildlife Service to collaborate on establishing a publicly-owned herd of wild, wide-ranging bison on Refuge and Park lands. This is a great opportunity to bring two Department of Interior agencies together to help restore America and Colorado's wildlife legacy, and is consistent with the Department of Interior's Bison Initiative. To this end we support, for bison, and in part, the Refuge's Alternative B2, together with the NPS's Alternative Concept 3, to the extent that they create habitat for bison on FWS and NPS lands. Together, these proposals could create thousands of acres of habitat for publicly-owned wild bison and opportunities for Coloradans to experience bison at a scale that would be an inspiring wildlife spectacle. However, we would argue that the NPS cannot realistically execute bison management independent of the FWS. By all rights, planning for bison, and probably for a host of other species which transit the two jurisdictions, should be conducted under a single planning process that addresses the unique responsibilities and regulatory frameworks for both agencies. We therefore urge the NPS to adopt additional language in its preferred alternative that would establish a common planning process for bison that would apply to both the FWS and NPS lands where bison are contemplated to be managed, and to incorporate by reference the outcome of that joint plan as part of the ungulate management plan to guide bison management going forward.

Organization: Rockies and Plains Office Defenders of Wildlife

Correspondence Id: 13 **Comment Id:** 402281

Comment Text: Why aren't FWS and NPS developing a joint management plan for the Baca NWR and NPS lands together? When The Nature Conservancy procured the Luis Marie Baca land grant and made it available to the federal agencies, they envisioned the federal agencies working as partners, not coming up with 2 separate management plans that would split a contiguous landscape in two. For many stakeholders and Colorado conservationists, it looks like the feds won't work together. More importantly, it is a waste of a conservation opportunity. There is tremendous evidence in the scientific literature on the benefits of larger landscapes to meet conservation goals. Larger more contiguous landscapes can support more biological diversity, better preserve evolutionary processes, and absorb ecological perturbations with more resilience than smaller

landscapes. To best manage for global climate change, the land should be managed as one landscape, not two separate plans. So why is there no joint agency management plan for the Baca/GRSA landscape?

Correspondence Id: 11 Comment Id: 402280

Comment Text: We encourage the collaborative partnership between NPS with US Fish and Wildlife Service and continuing to work closely with their National Wildlife Refuge Bison reintroduction study to determine the sharing of a publicly owned wild Bison herd on adjacent Department of Interior properties.

Organization: San Luis Valley Ecosystem Council

Correspondence Id: 9 Comment Id: 402269 C

Comment Text: Coordination with FWS - We urge NPS to coordinate bison restoration and management with FWS and to state this intent accordingly. The Alternative 3 language, Potential to expand bison range beyond NPS borders with willing neighbors on adjacent lands implies coordination but we would encourage NPS to state it even more directly. The decisions of each agency on where to allow bison can guide the size and origin of the bison herd as well as the location of fencing. Coordination with FWS could also lead to efficiencies with adaptive management and monitoring.

Organization: The Nature Conservancy

Correspondence Id: 7 Comment Id: 402268

Comment Text: Since the USFWS has similar plans to reintroduce a wild bison herd to the San Luis Valley National Wildlife Refuge, I would urge the NPS to combine their efforts with the USFWS and develop a common bison management plan that would allow the bison to have a larger area to range. This combined management effort would also lend strength to the program and benefit the bison over the long term.

Correspondence Id: 4 Comment Id: 402267

Comment Text: This plan offers an opportunity for the NPS and FWS to work together, jointly managing a larger, more sustainable herd across both the wildlife refuge and national park.

REFERENCES

U.S. Department of the Interior National Parks Service. (2001). Director's Order #12: Handbook for Environmental Impact Analysis. <http://home.nps.gov/applications/npspolicy/DOrders.cfm>

Appendix A - Copies of Correspondence Received

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PEPC Project ID: 25517, DocumentID: 61149

Correspondence: 1

Author Information

Organization Type:

I - Unaffiliated Individual

Correspondence Information

Status: New

Park Correspondence Log:

Date Sent: 08/30/2014

Date Received: 08/30/2014

Number of Signatures: 1

Form Letter: No

Contains Request(s): No

Type: Web Form

Notes:

Correspondence Text

Topic Question 1:

There are sufficient <http://parkplanning.nps.gov/projectHome.cfm?projectID=53971>.

Topic Question 4:

Consider that the natural predators are gone so reintroducing bison would be detrimental to the area.

Comments:

PEPC Project ID: 25517, DocumentID: 61149

Correspondence: 2

Author Information

Organization Type:

I - Unaffiliated Individual

Correspondence Information

Status: New

Park Correspondence Log:

Date Sent: 10/19/2014

Date Received: 10/19/2014

Number of Signatures: 1

Form Letter: No

Contains Request(s): No

Type: Web Form

Notes:

Correspondence Text

Topic Question 1:

Yes. From my limited knowledge, it looks like many choices to consider.

Topic Question 3:

I like that GRSA proposes to manage these elk & bison herds, in any form of range management. They will continue to grow, roam, and migrate, regardless of set boundaries. I like that GRSA would not consider introducing wolves- bad idea. I like the adaptive management concept, so that future changes could be made, if needed. I don't like the lethal shooting to manage an elk or bison herd; I would prefer public hunting to harvest the meat, and allow for sportsman to hunt. I like having a Round-Up for translocation (see comment below). I don't like introducing any more bison. You have enough animals to manage without introducing more of them. I question the fencing; bison migrate during storms regardless of boundaries.

Topic Question 4:

Has NPS inquired with the South Dakota, Custer State Park about their annual Bison "Buffalo Round-Up" every September. Some of the bison herd is auctioned-off to ranchers. I believe then, they either continue to raise, or harvest this meat for market. You would have to find out their process. It has been very successful for managing the bison herd.

Has the NPS determined the acreage needed for grazing for the elk and bison?

How many elk, and bison, can be supported on this acreage proposed? Once determined, does the NPS have the resources, both financially and man-power to care for these herds annually?

Why cannot the elk herds be transplanted? Is this not a viable way to cull the herd without killing them?

If not, then why not allow public hunting for a more 'ethical' approach rather than 'lethal removal' (If I read this correctly, I am not hearing any harvest of the meat.) At least, a public hunt; then use sharp shooters only if the herd is obviously too large.

Topic Question 5:

Again, I encourage the NPS to speak with other agencies, namely, Custer State Park, South Dakota, to learn how they manage their bison herd.

As for the elk, if they become over-populated there is a good chance they will become diseased, and die-off

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naturally. No matter what means are determined to cull the herd, remain open to changing management practices in the future.

I think that wildlife biologists, and wildlife management teams in other states, other local and regional agencies are your best resource for gathering input on how to manage these herds.

Comments:

PEPC Project ID: 25517, DocumentID: 61149

Correspondence: 3

Author Information

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Correspondence Information

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Correspondence Text

Topic Question 1:

We would suggest you Modify Alternative 3 and advance a full bison conservation option for ungulate management.

Topic Question 2:

We recommend a modified Alternative 3 that will maximize the conservation efforts for American Bison while protecting other natural resources in the area. Specifically we would ask for an expanded geography for bison to roam and minimal fencing to give bison access to the resources at large scale. Enabling bison to range as widely as possible across these conservation lands will increase the ecological influence they could express and maximize their functionality in this ecosystem. We believe that by doing so NPS may greatly benefit other species and better emulate the natural processes that accompany grazing as a natural ecological force.

Topic Question 3:

WCS dislikes the small vision for the ranging of genetically reputable bison. Small ball at this stage will not advance the conservation of the species.

Expanding the range of bison in a modified Alternative 3 will also enable greater opportunity for public hunting. Lessons from Yellowstone National Park illustrate the importance of having a large landscape available for hunting to optimize the use of this important tool as a population regulation method. To cluster hunting into small acreages is not desirable and can cause harm to the image of this harvest method while increasing safety risks to hunters.

Topic Question 4:

We also encourage inviting the suitable tribal partners in the region to consult and engage the decision process and

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future management of ungulates. Tribal partners can bring a sense of relationship and respect to the management of bison resources. In addition, they may be offered harvest opportunities to help with population regulation while enriching their cultural connection to the species. The need for large places where more than 1000 bison can roam to enrich and inspire human cultures is very important to the ecological future of this species

Topic Question 5:

You will be more likely to succeed in the conservation program for bison if you think at large scale and consider what ecological role bison may play in the future of this landscape. To repeat the mistaken strategy of keeping bison strictly confined in small spaces will be a tragedy. Few opportunities arise in the temperate grasslands, mountain valley and steppe habitats for a large scale restoration of bison...this is a great chance to advance that vision. This idea is consistent with the state objectives of the DOI bison report that was just released this past summer and consistent with the guidelines of the IUCN bison specialist group.

Comments: In North America, many wide-ranging mammals have experienced significant declines within the last 200 years. This loss of bears, cougars, wolves, elk, moose, pronghorn, and bison has resulted in fewer landscapes rich with large mammals and lower densities of mammals in many other landscapes. Nowhere is this more dramatic than in the case of North American bison, which experienced an ecological loss at a scale unparalleled in our modern history. Only 200 years ago, 30-50 million plains bison (*Bison bison*) roamed the grasslands and shrub steppes from Mexico to central Canada. To the north, wood bison (*B. b. athabasca*) ranged from boreal forests to the Arctic plain. In herds that numbered up to ten thousand animals, bison were an ecological keystone species on the Great Plains, northern boreal forest and montane grasslands. Their migrations, grazing patterns, and behavior shaped the physical environment as well as their myriad ecological interactions with other native species. Bison were integrally linked with the spiritual and economic lives of Native American cultures, and embodied the frontier for many Americans. Massive over-hunting and land-use change pushed bison to the brink of extinction, and by the 1870s bison had been decimated. By 1889, only about 1,000 bison were left.

Today bison remains a unique icon of North American culture and natural history. The numerical restoration of bison, which now number approximately 450,000, could be considered a conservation success story. However, the bison's important ecological roles in these landscape have not been restored in concert with their numerical restoration, as over 95% of these animals are being raised for meat in confined and managed circumstances. Today, bison exist in vastly differing management circumstances, herd dynamics, states of genetic integrity, and ecological settings than in the past. Bison are absent from most of their former range; their grazing does not influence the grassland fire or nutrient cycling regimes, and they rarely create habitat (or provide food) for other native species.

In order to restore the ecological role of bison across their original range, the Wildlife Conservation Society (WCS), an international science-based organization committed to conserving wildlife and wildlands, has set up a multi-stakeholder, transboundary initiative. This decision is rooted in WCS long history with bison: William Hornaday, WCS first director, conducted the 1889 survey that revealed how alarmingly close bison were to extinction. He, Theodore Roosevelt, and others formed the American Bison Society (ABS) in 1905. The ABS launched a national campaign to create wild bison reserves, stock them with bison from WCS Bronx Zoo and elsewhere, and educate the public about the bison's endangered status. The ABS helped reestablish bison by securing individuals from captive and private herds, raising funds, and lobbying for reserve establishment. In 1907, WCS shipped 15 bison to the Wichita Reserve Bison Refuge in Oklahoma by cart and rail car. In 1910, the ABS helped buy the nucleus herd for the National Bison Reserve.

In 2005, on the 100th anniversary of the ABS, WCS assessed the state of bison conservation and realized that there was a need for an umbrella group to work with the community of bison experts and managers in a second phase of the original ABS mission. As a result, on its 100th anniversary, WCS revitalized the American Bison Society with

the objective of working with partners to achieve ecological restoration of both wood and plains bison across North America. In May 2007 WCS published a multi-stakeholder report detailing the goal of ecological restoration and how it might be achieved (Redford and Fearn 2007). Without a concerted effort to accomplish large scale ecological restoration in places like the San Luis Valley and Great Sand Dunes NP, we may alter the natural evolutionary path for bison and lose the species to domestication and small population genetic effects (Hedrick 2009).

Efforts to ecologically restore American bison are badly needed as the future of wild bison is not yet secure. Recently COSEWIC evaluated the status of plains bison and found them to be threatened in Canada. Opportunities to enable bison to function as an ecological force are rare. Most plains bison herds in North America (75%) are isolated and in populations less than 400. We encourage the NPS to fully explore opportunities to build a cooperative bison restoration program with USFWS and TNC partners in the San Luis Valley.

We recommend a modified Alternative 3 that will maximize the conservation efforts for American Bison while protecting other natural resources in the area. Specifically we would ask for an expanded geography for bison to roam and minimal fencing to give bison access to the resources at large scale. Enabling bison to range as widely as possible across these conservation lands will increase the ecological influence they could express and maximize their functionality in this ecosystem. We believe that by doing so NPS may greatly benefit other species and better emulate the natural processes that accompany grazing as a natural ecological force.

Expanding the range of bison will also enable greater opportunity for public hunting. Lessons from Yellowstone National Park illustrate the importance of having a large landscape available for hunting to optimize the use of this important tool as a population regulation method. To cluster hunting into small acreages is not desirable and can cause harm to the image of this harvest method while increasing safety risks to hunters.

We also encourage inviting the suitable tribal partners in the region to consult and engage the decision process. Tribal partners can bring a sense of relationship and respect to the management of bison resources. In addition, they may be offered harvest opportunities to help with population regulation while enriching their cultural connection to the species. The need for large places where more than 1000 bison can roam to enrich and inspire human cultures is very important to the ecological future of this species

We realize that conserving one of North America's most iconic species, the bison, has become a broader and more complex endeavor than it was a century ago when Hornaday and Roosevelt supported the American Bison Society's pivotal demographic rescue of the species - what could be called the First Bison Restoration. The Second Restoration - establishing ecologically functioning bison populations, may require another century. The ecological restoration of American Bison will certainly require collaboration among a broad range of partners, including government agencies, NGOs, universities, producer groups, and Native American groups. Despite this challenge WCS believes that bison belong on our continent forever, moving in large herds and interacting significantly with grassland ecosystems, while inspiring and sustaining human cultures. We urge NPS to consider a full bison conservation alternative in your ungulate management plan that explores a large scale cooperative venture with BACA National Wildlife Refuge, TNC and even neighboring private ranches that are willing partners. Enabling bison to fulfill their ecological role across large scale multi-jurisdictional landscapes is a rare opportunity in North America and we hope the Department of Interior will advance such initiatives when opportunities arise.

Hedrick, P.W. 2009. Conservation genetics and North American bison (*Bison bison*). *Journal of Heredity* 100:411-420.

Redford, K. H., K. Aune, and E. Fearn. 2009. The second recovery of bison: Ecological recovery of North America's largest mammal. *The Wildlife Professional*, Vol 3: 46-50.

PEPC Project ID: 25517, DocumentID: 61149

Correspondence: 4

Author Information

Organization Type:

I - Unaffiliated Individual

Correspondence Information

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Topic Question 1:

While I support part of NPS's Alternative Concept 3, I firmly believe the agency can do more. NPS should aim for full ecological restoration of wild bison. I urge NPS to amend Concept 3 to include the option of increasing the population of wild bison to 1000 animals or more, consistent with resource capacity.

Topic Question 3:

The proposed bison population levels and management area are not adequate or sustainable. Numbers and acreage should be increased, in cooperation with the Baca National Wildlife Refuge and the U.S. Fish & Wildlife Agency.

Topic Question 4:

This plan offers an opportunity for the NPS and FWS to work together, jointly managing a larger, more sustainable herd across both the wildlife refuge and national park.

Comments: Bison are a fundamental part of America's natural heritage, and we should do everything we can to re-establish wild populations in suitable habitat. The current management plan for the Great Sand Dunes National Park and Preserve Ungulate Management Plan is an excellent opportunity that must not be missed. My family and I have thrilled at the sight of wild bison in Yellowstone- --one experience, as the sun rose over the Lamar Valley, is my favorite all-time wildlife viewing memory. Colorado can not only offer the same opportunity for families in the future but be an essential part of ensuring that wild bison will continue their recovery from near-extinction.

PEPC Project ID: 25517, DocumentID: 61149

Correspondence: 5

Author Information

Organization Type:

I - Unaffiliated Individual

Correspondence Information

Status: New

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Correspondence Text

Topic Question 1:

No, I think you missed an alternative by not having a "no bison/comprehensive elk" management alternative. In your public meetings and during conversations with park staff, it was noted that the historical occurrence of bison within the SLV was transient. You are trying to place a large hard to contain animal that is supposed to have been transient on a landscape that is not designed to have a permanent resident population. I recommend that you exclude the bison from all of the alternatives and focus on managing the elk population.

Topic Question 2:

The elk population has persisted throughout time in the area and is at way over the recommended CPW herd population numbers. Because of the high elk densities and the refuge status of the NP, the elk herd is causing un-repairable damage to riparian and upland habitat types. The park personnel focus on/and maintain that it is an elk distribution problem and refuses to admit that there are too many elk on the landscape. We all know that elk are a very mobile and resilient creature and the only way to manage elk distribution is with lethal methods.

I would like to see a lethal elk management strategy timed to coincide with outside hunting seasons. This would keep the animals on the move and expose them to additional, off the NP hunting pressure. For this to be effective it must be maintained for several days, as short bursts of activity without follow-up are ineffective as the elk will return within 24 hours.

Hazing is mentioned as the initial response to elk distribution problems. In an environment of shrinking budgets and additional demands on park personnel it is unrealistic that the park can maintain any effective changes in distribution of the elk population with this as the first wave of management. Also it is mentioned several times in the alternatives that dogs will or can be used to haze the animals. I do not recommend this, as it is a direct violation of CPW rules and regulations and is a very unacceptable management strategy to most people that manage the elk resource.

Topic Question 3:

I like to see that the National Park service is attempting to actively manage the wildlife resources on their parks and have realized that a hands-off approach on the limited landscapes that they manage, impacts more than just the park itself.

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Topic Question 4:

I would like to see the park accept that they are a land management agency and see them manage park landscapes to preserve the wildlife diversity on those landscapes. This means utilize all of the current tools to conserve wildlife habitats and not just take a preservationist, no management, view on natural processes. I would like to see a more liberal view on the use of natural ignition fires and additional forest management that mimics pre-European settlement of the area.

Comments:

PEPC Project ID: 25517, DocumentID: 61149

Correspondence: 6

Author Information

Organization Type:

I - Unaffiliated Individual

Correspondence Information

Status: New

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Correspondence Text

Topic Question 1:

Yes, this seems to be a sufficient (or excessive) range of alternatives.

Topic Question 2:

I don't know what management tools should be changed, if any, if you are already using them and they are working. The range of alternatives will require expansion of staff to manage the already diverse aspects of running a park and adding a previously managed herd of bison along with elk "management" (which is not really management if you consider ranching management of cattle and sheep as an effective form of management, which does not allow dispersal by hazing onto other people's property or onto public lands.) Don't create jobs for more folks when staffing under current federal economics is already stretched to the limits.

Topic Question 3:

I like the Alternative Concept 1: no bison/active elk management

multi-species management (adding bison) requires added managers with expertise in handling, upkeep of facilities for handling, and marketing or culling the herds. The recent 15 years of drought have caused elk to overrun private ranchlands and herd size is not being effectively managed. Feed issues have been a problem so elk herd size needs attention before taking on any new stuff.

Topic Question 4:

You are not responsible for creating a three-ring circus (wider spectrum for public interest): the Sand Dunes, Medano Creek, archeology, educational programs, and visitor center with other features already provided is enough. Drop the bison. The elk have already displaced populations of deer in the past 35 years, let's try to restore some balance.

Topic Question 5:

Fencing is expensive and requires upkeep. The Great Sand Dunes is not a zoo.

Comments:

PEPC Project ID: 25517, DocumentID: 61149

Correspondence: 7

Author Information

Organization Type:

I - Unaffiliated Individual

Correspondence Information

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Correspondence Text

Topic Question 1:

I believe there are a sufficient number of alternatives in the NPS plan. As a Coloradan, I strongly believe in bison reintroduction for the Great Sand Dunes National Park. I have visited this natural area 3 times over the past 4 years. While the scenery is spectacular and unique, I believe addition of bison to the ecosystem would enhance the visitation experience. Large ungulates always enhance the value of parks and add to the ecotourism value both in terms of experience and economic benefit to the local economy.

Topic Question 2:

Since the USFWS has similar plans to reintroduce a wild bison herd to the San Luis Valley National Wildlife Refuge, I would urge the NPS to combine their efforts with the USFWS and develop a common bison management plan that would allow the bison to have a larger area to range. This combined management effort would also lend strength to the program and benefit the bison over the long term.

Topic Question 3:

See response to question 2. Also, I believe that the agency should move forward more rapidly and reintroduce bison to the Sand Dunes ecosystem.

Topic Question 4:

At some point, bison (and elk) will achieve numbers that might be considered to be in excess of what the ecosystem can provide. A hunt ultimately is chosen to "manage" such herds in the absence of natural carnivores. Therefore, I believe some upper limits should be included in the plan in terms of striking a need to cull the herds or open the areas to hunting. This part of the plan should be stated up front so as to let the public know that there is an upper limit to the proposed size of the herd. RMNP has dealt with this issue for 100 years and has had a lot of bad publicity in terms of not knowing when or how to manage their elk herd.

Topic Question 5:

See response to question 4. As stated, my impression upon travelling around most of Colorado is that there are millions of acres that could have large ungulate populations but do not. This, I believe is a result of over-hunting and poor management of these species across Colorado, making it impossible to establish permanent populations of wildlife. It is time for wildlife management in Colorado to accept that ecotourism and the value of viewing wildlife in the state trumps the value from hunting. Therefore, I strongly support reintroduction of wildlife in the state.

Comments: As mentioned, I strongly support reintroduction of bison in the Great Sand Dunes National Park and Preserve area, and wish that the effort would move forward quickly and in combination with the USFWS in its plan for reintroduction in the San Luis Valley Refuge.

PEPC Project ID: 25517, DocumentID: 61149

Correspondence: 8

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Topic Question 1:

Yes, but some important details have yet to be detailed that could change our support for preliminary alternatives. For instance, our organization is likely to support Alternative Concept C, but range size of a conservation herd is an important factor of this plan and is not detailed in the proposal. Similarly, we would only support a plan that incorporates a vigilant ongoing plan to introduce and maintain a brucellosis-free herd, and some of these plans are not yet laid out.

Topic Question 2:

Management tools for bison are not well defined.

Topic Question 3:

Alternatives 1-3 acknowledge the ecological contributions of bison to the GRSA landscape and the importance of maintaining herds of these native animals in the park. We also appreciate that these alternatives consider the relationship between populations of large, grazing ungulates on one another and strive to maintain a balance between them. We prefer Alternative 3 because we feel that the introduction of a conservation herd with stronger genetic integrity is more consistent with the DOI's and NPS' bison conservation objectives, and because we feel that fostering more genetic integrity in a Western American bison population will benefit the species in the long-term.

Topic Question 4:

Ensuring close monitoring of both populations (and their relationship with other ungulates in the park, such as deer and pronghorn) to ensure that species conservation and other ecological goals are being met will be critical. We feel that, should Alternative 3, or any other alternative that incorporates bison into the park, should include a vigilant approach to ensuring a herd free of brucellosis. Additionally, we cannot underscore enough the importance of maintaining close collaboration with public, private and tribal stakeholders, and providing opportunities for

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meaningful input in NPS' adaptive management bison on an ongoing basis.

Topic Question 5:

Please see comments submitted below and contact vmazal@npca.org if additional comments do not come through.

Comments: October 28, 2014

Ms. Lisa Carrico
Superintendent
Great Sand Dunes National Park & Preserve
11500 State Highway 150
Mosca, CO 81146

Submitted Electronically

RE: Public Comments on DEIS Alternatives for Bison Reintroduction/Ungulate Management Plan

Dear Superintendent Carrico,

National Parks Conservation Association (NPCA) submits the following input in consideration of draft environmental impact statement (DEIS) alternatives for the proposed ungulate management plan at Great Sand Dunes National Park & Preserve, under the requirements of the National Environmental Policy Act (NEPA) process. NPCA is a national, privately-funded non-profit organization with over one million members and supporters whose mission is to protect and enhance Americas National Park system for present and future generations.

NPCA has been actively involved in issues pertaining to bison management on National Park Service (NPS) lands through our Washington, D.C.-based headquarters, and Northern Rockies and Southwest regional offices. We offer the following comments on the GRSA draft ungulate management options, in light of both the regional objectives stated in the Department of Interiors (DOIs) 2008 Bison Conservation Initiative Framework and 2011 National Park Service Call to Action, and findings outlined in DOIs June, 2014 report entitled DOI Bison Report: Looking Forward, as well as the specific park management objectives stated in the September 2014 GRSA Ungulate Management Plan and Environmental Impact Statement, Newsletter 2.

Background: Bison at Great Sand Dunes National Park

In accordance with the DOIs 2008 Bison Conservation Initiative and 2011 National Park Service Call to Action, which together lay out objectives for regional bison reintroduction in the Western United States, the National Park Service (NPS), is considering alternatives for restoring American plains bison (*Bison bison*) to Great Sand Dunes National Park & Preserve (GRSA) in south-central Colorado. Located in the foothills of the Sangre de Cristo Range, the park and the adjacent preserve, managed by Colorado Parks & Wildlife, serve as a gateway between the plains of eastern Colorado and the San Luis Valley, an 8,000 square mile, high-altitude basin that forms the northern stretch of the Rio Grande Rift. In its recent June 2014 report, DOI identified GRSA as a potentially suitable habitat for further American bison restoration, albeit with high level management considerations as compared other DOI-owned lands.

Until the last century, bison were an important aspect of the ecology at Great Sand Dunes. Both the San Luis Valley and the eastern Colorado Plains are known to have been range for resident bison populations. Substantial historic and archaeological evidence also suggests that bison regularly migrated through the Great Sand Dunes areas network of public lands and private lands, which includes Great Sand Dunes National Park and Preserve; The

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Nature Conservancy-held Medano-Zapata Ranch; and the US Fish & Wildlife-managed Baca National Wildlife Refuge, although evidence is less conclusive that the area supported established, resident large bison herds. (USFWS is seeking input on bison restoration plans on the Baca refuge under a separate NEPA process.) Since 1989, a commercial herd of domesticated bison, presently numbering about 1,700, has grazed on the 103,000-acre Medano-Zapata Ranch, owned and operated by The Nature Conservancy (TNC) since 1999, within the designated park boundary. The current DEIS alternatives anticipate that NPS will successfully acquire the ranch as an addition to the park.

NPS is considering four draft alternative concepts as part of its current ungulate management DEIS, which deals with elk and bison. As NPCA understands, management of either of these two large, grazing ungulates has implications for the other since they compete for resources and both lack substantial populations of natural predators within the park. Factoring this dynamic and the ecological carrying capacity of GRSA lands in terms of range and vegetation, the management alternatives presented include:

" No Action alternative would continue the direction of a 2007 General Management Plan and Record of Decision to graze the current herd of TNC-managed bison on the Medano-Zapata ranch until NPS acquires the TNC property, at which point the existing fence and the herd would be removed. Under this alternative, NPS would not enact elk management activities. (Note: the 2007 GMP calls for elk management but does not specify options.)

" Alternative Concept 1 would reflect No Action management for bison, with the addition of non-lethal elk management tools consisting of hazing and fencing, and then limited lethal removal as a secondary course of action (i.e., would result in no wild bison and a managed elk population).

" Alternative Concept 2 proposes to retain the existing TNC herd of domesticated bison, and construct a fence along the western edge of NPS property when the Medano-Zapata ranch is acquired. (The ranch boundary spans anticipated future additions to both the USFWS-managed refuge and the NPS-managed park.) This option would also enact a full suite of elk management activities, including non-lethal and lethal removal, as well as lethal take as needed.

" Alternative Concept 3 proposes to remove the TNC domesticated herd and introduce a new, small population (initially 25-100) of more genetically pure, wild bison of Yellowstone origin within the existing bison fence on NPS land, and construct a new fence on the western boundary of the park until bison management decisions are resolved on the USFWS Baca National Wildlife Refuge. The herd would be managed adaptively with a goal of ultimately growing both the size of the herd (to 100-400) and its range, as allowable by social and natural conditions, in concert with a full suite of elk management tools, as per Concept 2.

Considering the proposed draft alternatives above, NPCA generally supports the principles described under management Alternative Concept 3 as presented in the DEIS. However, should establishing a new conservation herd prove prohibitive, transferring management of the existing TNC herd to NPS would be an acceptable, although less preferable alternative, under certain conditions.

The rationale for NPCAs support of this alternative, as well as our concerns and considerations, is detailed below:

1. GRSA offers an historically and ecologically appropriate setting for wild plains bison reintroduction in support of DOIs and NPS objectives

Wild plains bison were prolific on Western landscapes until the early 20th century, and played crucial roles in Americas cultural and political histories. They were an integral part of both plains- and woodland-dwelling American Indian cultures, and as a keystone species, performed important ecological functions wherever they ranged - - across desert, plains, and alpine environments. While domesticated bison, which have been cross-bred

with cattle, continued to be raised as livestock, wild, free-roaming plains bison were almost eradicated in the late 1800s, when their numbers dwindled to a small herd of less than 50 in Yellowstone National Park.

NPCA commends DOI and NPS for their long-standing stewardship of wild plains bison. Were it not for DOI's efforts - along with those of its state, tribal and private partners - - to restore wild plains bison populations, this native North American species would have been permanently lost. Today, DOI agencies manage 17 herds totaling approximately 10,000 head on over 4.6 million acres of public and adjacent lands in 12 states, according to the department's June 2014 bison report.

Further, we support DOI's ambitions to expand its conservation efforts to restore wild bison to appropriate American landscapes, per its 2008 Bison Conservation Initiative (BCI) framework, as well as NPS's own mandate to restore and sustain three wild bison populations across the central and western United States in contribution to DOI's goals. The BCI framework lays out several important action items that serve as principles for DOI's reintroduction program. Among them are the goals to:

- " prevent and control non-native diseases;
- " establish bison meta-populations with high levels of genetic integrity; and
- " conserve genetic variation and promote natural selection of DOI bison herds.

Accounting for these principles, the DOI bison report issued earlier this year details specific opportunities and challenges for expanded bison conservation efforts on DOI lands in five states - Colorado, New Mexico, Arizona, Nebraska, and South Dakota. The report analyzed 27 locations and deemed 20 of them suitable, noting levels of reintroduction and management complexity.

In the 2014 bison report, GRSA and the adjacent network public and private lands is examined among three potential bison reintroduction locations in Colorado. It emerges as the only location in the state deemed suitable for expansion on the eastern slope of the Rocky Mountains, where plains bison are believed to have once been most numerous.

The TNC-managed herd is currently fenced in a 32,000 -acre enclosure that spans the Baca National Wildlife Refuge, Great Sand Dunes, and the TNC-owned Medano-Zapata Ranch. Under the proposed plans in Alternative Concept 3, a fence would need to be erected to keep bison off of the USFWS-managed Baca Refuge until a decision is reached on whether to introduce bison at the refuge, reducing the size of their range by approximately 6,000 acres. However, NPS would expand the bison's range within the park (details TBD), and possibly on adjacent lands in the future, as conditions allow. Ongoing studies suggest that a significant portion of the park's valley floor is likely suitable as bison habitat.

Collectively, GRSA's area network of lands offer significant range expansion opportunities, but even the expanded area within the park boundary would present suitable range for the introductory herd of the size proposed in Alternative 3 (initially approx. 20,000-30,000 acres for up to 100 bison, with range and herd size expanded as conditions allow).

NPCA believes that wild, free-ranging bison could contribute to restoring the natural ecological system within GRSA, benefitting the park's other wildlife and vegetation in the long-term.

Considering their historic cultural significance and ecological contributions of bison to the Great Sand Dunes area and eastern Colorado, and accounting for known details of the proposal, such as range appropriateness and size, NPCA believes that GRSA should be considered for wild bison reintroduction.

2. Phase Bison Reintroduction Using an Adaptive Management Approach

NPCA concurs with the plans presented in Alternative 3 to phase bison reintroduction using an adaptive management approach, underscoring that the goal should be to actively seek opportunities to increase both the range and herd size. Historic and ecological evidence indicates that larger herds and expanded range would more accurately reflect the areas historic natural conditions, and could ultimately yield greater ecological benefits, including maintaining more robust genetic herd composition. However, studies also support close monitoring of bison conservation activities to ensure that both genetic goals and other ecological objectives are being met.

Additionally, a phased, adaptive management approach will allow more time to educate and engage with the public and impacted stakeholders to ensure that their concerns are being addressed as the herd and range grow.

As GRSA bison herd is integrated into the park, elk population management objectives should also aim to accommodate an increasing bison herd size. The Great Sand Dunes Ecosystem Elk and Bison Carrying Capacity Model and subsequent studies offer guidance and tools for achieving balance between these two ungulate populations in the future management of the Great Sand Dunes area.

3. Strive to Conserve Wild Bison Genetic Diversity

Genetic testing has revealed introgression with cattle genes in most U.S. bison herds, including the one grazing at the Medano-Zapata Ranch. (This herd exhibits approximately 5% cattle gene introgression, relatively low for a private herd.) While genetic introgression does not inherently affect bison's fitness or reproductive success in the short term, it does impact their physical characteristics and behavior, and may alter their resilience to naturally occurring viruses or ecological conditions, as well as the nature of their ecological functions as a keystone species. The domesticated herd at the Medano-Zapata ranch have contributed significantly to scientific research regarding the impacts of grazing ungulates on the ecology of the Great Sand Dunes area, and may even have produced similar ecological benefits as a genetically pure herd would have. However, as a non-native species, they benefit neither the DOI's wild bison conservation goals nor GRSA's wildlife management goals.

Thus, NPCA's strong preference is that every effort should be made to introduce a more genetically pure conservation bison herd from one of DOI's conservation herds exists. Only in the event that efforts to introduce a new conservation herd prove infeasible should NPS and GRSA consider the proposal to retain the existing TNC-managed herd, as put forth in Alternative Concept 2. Candidate herds to draw from include the Yellowstone herd, Henry Mountain herd, managed by the state of Utah, and Wind Cave herd, all of which have been tested to reflect the strongest genetic integrity among bison herds on DOI lands. All of these derive from Yellowstone herd lineage, so may not present the ideal geographic adaptability traits for conditions at GRSA, but we believe that preserving plains bison species genetic integrity should be prioritized over other selection characteristics.

Bringing genetically-pure wild bison to Great Sand Dunes National Park and Preserve would help DOI achieve its regional reintroduction objectives to diversify the genetic makeup of the Western wild plains bison population, improving its resilience and long-term stability.

We recognize that the challenges of removing the existing, domesticated herd and transporting a new, quarantined, wild herd to the park contribute to the complexity of the GRSA wild bison reintroduction plan, but we feel that the potential long-term benefits outweigh the short-term costs.

4. Employ Brucellosis Quarantine as a Tool for Maintaining a Disease-Free Herd

NPCA cannot underscore enough the importance that any bison herd at GRSA, whether derived from wild or domesticated stock, be tested and regularly demonstrated to be free of brucellosis, a disease caused by a non-native

bacteria likely introduced into the bison population by cattle. Brucellosis increases the incidence of stillbirth and non-viable calves in bison and other ungulate populations. Up to two-thirds of the wild bison population in the U.S. is infected with the disease.

As a result of concerns about high infection rates in the Greater Yellowstone (GYA) population in particular, the Interagency Bison Management Plan for the State of Montana introduced the brucellosis quarantine protocol as a tool for separating and safely transferring uninfected bison to other lands for species conservation purposes. While the quarantine protocol has yet to be formally adopted and some questions about it have yet to be resolved, it raises the possibility of introducing bison that have been tested to be seronegative for brucellosis into GRSA, and to implement management practices that would keep a GRSA herd free of the disease in the future.

NPCA encourages NPS to adopt strict adherence to a brucellosis quarantine protocol, as well as routine brucellosis testing on an ongoing basis, and to develop a plan for mitigating against the spread of the disease should it occur in the GRSA herd in the future. Addressing the prevalence of brucellosis is critical to alleviating public concerns about the reintroduction of bison on Western public lands, especially among those who raise cattle and other livestock on adjacent parcels. Testing information should be made publicly available so that other stakeholders can actively help mitigate the spread of the disease in domestic livestock and other wildlife populations.

5. Foster Ongoing Collaboration with Private, Tribal and Public Stakeholders in Bison Management

As DOI aptly notes in the 2014 bison report as well as in the 2008 BCI, collaboration with potentially impacted segments of the public, affected tribes, cooperating federal and state agencies, and other stakeholders, is critical to the success of a bison conservation program within the National Park system. NPCA commends the staff at GRSA for its efforts to directly outreach to and seek input from several of these outside groups and institutions. In particular, we understand that affiliated American Indian tribes who have had a direct connection to the GRSA park lands have been included in the decision processes about wild bison reintroduction.

NPCA also encourages GRSA to involve Plains tribes, who may have a less immediate relationship to GRSA, in this decision. For instance, the southern Cheyenne and Arapahoe, Pawnee, Kiowa and Comanche tribes are all historically buffalo-hunting tribes with ties to southern Colorado, and may consider themselves stakeholders to the GRSA ungulate management plan as it relates to bison reintroduction.

Further, it is important for GRSA and NPS to include clear, meaningful opportunities for stakeholder input and participation in its ongoing adaptive management approach, should it decide to introduce wild bison to NPS lands. Too often, input is sought only during the planning phase, but impacted organizations and individuals can also provide useful information to aid in effective management after a plan is implemented. Cultivating ongoing management relationships with other stakeholders will result in more defensible decisions and more robust management outcomes. Moreover, wild bison reintroduction is an issue that has emotional, cultural, economic and ecological implications, and it is important for NPS to have inclusivity at the center of its approach.

6. Capitalize on Bison Conservation Education and Engagement Opportunity

Finally, wild bison in Great Sand Dunes National Park and Preserve offer tremendous educational and engagement opportunities for park visitors, as well as cultural experiences for American Indian Tribes affiliated with the park and buffalo. The current herd is only viewable by the public in a limited capacity. GRSA should develop its bison range so as to provide opportunities for the public to view the animals and to become educated. For instance, we understand the historic Medano homestead would be part of the land transfer. This historic site could offer an ideal educational and viewing facility. In any case, GRSA should be prepared to interpret its bison program for a broad audience and seek to engage the public in bison conservation efforts. This may ultimately require additional

interpretive resources, roads and trails, and/or visitor facilities.

NPCA also encourages NPS to actively seek to develop cultural engagement opportunities with American Indian tribes. The return of free-roaming bison to this part of Colorado is very meaningful for tribes and could help to reintroduce or preserve traditional cultural practices.

Summary

Considering the historic cultural and natural significance of bison in eastern Colorado, and factoring the appropriateness of the habitat and range size, NPCA believes that every effort should be made to reintroduce wild bison to Great Sand Dunes National Park and Preserve. Factoring range and habitat appropriateness, wild bison reintroduction to Great Sand Dunes would present an extraordinary step toward achieving DOI's conservation goals.

However, GRSA should be vigilant about ensuring a disease-free bison herd to protect the health of other wildlife and livestock, and one with strong genetic make-up to foster a more robust wild bison population in the region for the long-term. Further, GRSA and NPS should closely monitor ecological conditions to ensure that a wild bison program is achieving its intended goals.

Finally, GRSA and NPS should remain highly attuned to the socio-political landscape, and actively seek collaboration from public, private - - and especially tribal - - stakeholders in the process on an ongoing basis.

Sincerely,

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1. See, for example, Meany, C. and Van Vuren, D., Recent Distribution of Bison in Colorado West of the Great Plains, Proceedings of the Natural Museum of History of Denver, Series 3, Number 4, December 15 1993.
2. See Shoenecker, K. et al., Annual Progress Report 2005: Elk and Bison Grazing Ecology in Great Sand Dunes National Park, USGS, NPS 2005, and Wockner, Boone, et al., Great Sand Dunes Ecosystem Elk and Bison Carrying Capacity Model: Description and Scenario Results Natural Resource Ecology Laboratory, Colorado State University and USGS Ecological Resources Division, 2010.
3. Hedrick, P.W., Conservation genetics and North American bison, Journal of Heredity 100:411-420, 2009.
4. See Wockner, Boone, et al., 2010.
5. Gates, C.C., et al., American Bison: Status Survey and Conservation Guidelines 2010, IUCN, Gland, Switzerland, 2010.

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October 27, 2014

Lisa Carrico, Superintendent
Great Sand Dunes National Park
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Subject: Comments on the Ungulate Management Plan and Environmental Impact Statement - Preliminary Draft Alternatives, Great Sand Dunes National Park and Preserve

Dear Lisa,

The Nature Conservancy would like to thank you for the opportunity to provide comments on the Ungulate Management Plan and Environmental Impact Statement (EIS) Preliminary Draft Alternatives for Great Sand Dunes National Park and Preserve. We appreciate the Park Services efforts to give thoughtful consideration to the management of bison and elk in the Park and Preserve. We support some combination of Alternatives 2 and 3: Bison restoration with a conservation herd or the existing herd, an expanded bison range, and comprehensive elk management. Our detailed comments are provided on subsequent pages.

The Conservancy greatly values its partnership with the National Park Service (NPS). Our organizations share many Correspondences - Ungulate Management Plan/EIS - PEPC ID: 25517

goals and an important overlap in mission - ensuring the preservation of natural resources. We have a long history with the Park and are proud of the role that the Conservancy was able to play in the purchase of the Baca Ranch, the creation of the Great Sand Dunes National Park, and the formation of the adjacent Baca National Wildlife Refuge. We look forward to working with the National Park Service on the implementation of the Ungulate Management Plan.

Thank you for your consideration. Please don't hesitate to contact us with questions.

Best Regards,

/s/ Tim Sullivan

Tim Sullivan, State Director

The Nature Conservancy in Colorado_____

GENERAL COMMENTS

Great format - We would like to compliment the NPS on developing concise Preliminary Draft Alternatives and presenting them in such a simple and easy-to-understand format. It was very easy to digest and comment on the options. Thank you!

Adaptive management - We fully support NPS's stated intent to use adaptive management under all of the action alternatives (p.5). We appreciate the inclusion of specific adaptive management approaches in all three action alternatives in order to assess indicators and guide management actions (e.g., active elk management tools utilized in phased approach, bison managed within a population range as resource conditions allow, etc., p.3).

Plan Objectives - For the draft plan, we encourage NPS to develop specific and quantitative objectives so that NPS will be able to demonstrate how the plan does or does not meet them. Our recommendation is to provide more specific examples of how the management tools being considered for each alternative will be used to address resource conditions. We also recommend that the Park Service explain further why certain management tools are not included for consideration in the plan.

BISON

General - As NPS is aware, we fully support the restoration of bison on NPS lands as a key part of a restoration landscape that was identified in the Southern Rocky Mountains Ecoregional Assessment (Neely et al. 2001). Our scoping comments from 2006 provide rationale (Attachment 1).

Plan Objectives - We suggest that the bison alternatives address the Plan Objective of Enhancing public awareness. The presence of a bison herd will provide an opportunity for NPS to enhance park visitor experiences and understanding of ecological processes through public tours or potentially drive-by opportunities to view the bison. A bison herd that is visible to visitors is also likely to increase park visitation. This is also consistent with the bison species conservation value of connection of people to nature envisioned by the Vermejo Statement (Sanderson et al., 2008, p. 263).

Range of Alternatives - We encourage NPS to expand the range of alternatives in the Draft Plan based on the options for bison management. As currently written, Alternatives 2 and 3 mix two issues related to bison - the origin of the population (existing herd vs. conservation herd) and the size of the range (within the existing fence vs. an expanded range). Alternative 2 currently includes the existing bison and the range within the existing fence, while

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Alternative 3 currently includes a conservation herd and an expanded range. Alternatives 2 and 3 could be broken out into a total of four alternatives based on bison (note that all alternatives still would involve comprehensive elk management):

- " Existing bison herd and existing range
- " Existing bison herd and expanded range
- " Conservation herd and existing range
- " Conservation herd and expanded range

The Nature Conservancy's vision and conservation goal has been, from prior to the acquisition of the Medano-Zapata Ranch, the restoration of bison into a landscape from which they have been extirpated. As such we strongly support the consideration of an alternative that includes:

" A conservation herd of bison of sufficient size to maintain genetic viability, or keeping the TNC bison herd (as in Alternative 2), if/when NPS acquires Medano Ranch.

" Expanded bison fencing to maximize bison range on NPS land during the life of the plan (as in Alternative 3).

Consideration of this alternative could also permit flexibility in managing bison across administrative boundaries, pending bison decisions in the U.S. Fish and Wildlife Service (FWS) Comprehensive Conservation Plan. Comments about coordination with FWS, herd genetics and size, and range and fencing are below.

Coordination with FWS - We urge NPS to coordinate bison restoration and management with FWS and to state this intent accordingly. The Alternative 3 language, Potential to expand bison range beyond NPS borders with willing neighbors on adjacent lands implies coordination but we would encourage NPS to state it even more directly. The decisions of each agency on where to allow bison can guide the size and origin of the bison herd as well as the location of fencing. Coordination with FWS could also lead to efficiencies with adaptive management and monitoring.

Herd Genetics and Size - We understand the NPS's interest in establishing a conservation herd based on objectives of the DOI Bison Conservation Initiative and we support the goal of a conservation herd as a key contribution at the continental scale. If the Sand Dunes are considered a location that is important to the North American strategy for a conservation herd, the plan should establish a restoration goal that can be achieved over time through adaptive management. Such a goal should strongly consider the paper by Wang and Gross (2005), which recommends a herd size of at least 1,000 animals as sufficient for the long-term management for genetic viability. The Bison Conservation Initiative also states that, Maintaining or creating herds or metapopulations in excess of 1,000 animals is considered as likely essential to the long-term genetic viability of individual bison within the herds (Bison Conservation Initiative, p.9).

Additional reasoning for using a viable/sustainable number of bison is that it would assure that the herd would be buffered against future problems of off-site herd availability, challenging politics or policy, and concerns about the introduction of other problems.

As an alternative, if a herd of 1,000 animals with no detectable bovine alleles is not feasible, we urge NPS to use the existing TNC herd because: 1) it has a high representation of bison genetic diversity, 2) the herd is in place, knows the landscape, and there are few issues with bison breaking through fence, 3) there is broad, local acceptance of current TNC herd in the San Luis Valley, and 4) the herd has a very low level of detected bovine genetic material and is being improved through management on the Medano Ranch.

Regarding herd size, we would encourage NPS to consider recent research and to identify quantitative resource objectives, such as for species composition and density, in order to determine carrying capacity. Forthcoming research shows that the NPS lands alone can support a herd of up to 1,000 bison. If the Baca Refuge allowed for bison, a herd of up to 3,500 would be possible (Schoenecker et al., In Press). We also encourage NPS to describe the

composition of the herd in the draft plan, considering age and gender. We would be happy to work with NPS on determining an optimal herd composition if that would be helpful.

Range and fencing - Fencing should be done strategically to allow options in the future and make the best use of Park Service funding. The current language about constructing a fence on the western boundary is limiting and may preclude cooperative management with the Baca National Wildlife Refuge. A western boundary fence would prevent bison from ranging onto the Refuge. The Park Service should continue to work with the FWS on management that is in line with the original, long-term vision of this landscape as a single unit, instead of fragmenting conservation outcomes among ownerships. We therefore recommend modifying the language in the Draft Alternatives as follows: NPS may construct a new fence on the western boundary to retain bison on NPS land within the existing bison fence. The decision will depend upon negotiations with FWS, who are considering establishing a bison research area which may lie adjacent to NPS lands. NPS will discuss with FWS the possibility of cross-boundary management of a bison herd. We fully support the concepts in Alternative Concept 3 to expand bison range beyond NPS borders with willing neighbors on adjacent lands. The Nature Conservancy is willing to assist with this process.

Management - Alternatives 2 and 3 provide general descriptions of bison management (e.g., Active bison population management required in Alternative 2). Please identify the tools from Page 4 that would and would not be utilized under each alternative. We support the use of all tools currently listed.

ELK

General - We fully support comprehensive elk herd management and the creation of a specific plan with herd size targets. We support the reduction of the elk herd as a restoration strategy since natural predators and predation have been eliminated or reduced. Elk are currently consuming a large portion of the available forage and therefore having some impacts on vegetation that are not likely to have occurred pre-historically. Finally, reduction in elk numbers would be a key step to the maintenance of a restoration/conservation herd of bison, reducing resource conflicts that are a result of inflated numbers of elk (Schoenecker 2012). As elk have been successfully restored in Colorado, bison have no conservation herds in Colorado.

Tools - Ensure consistent wording for elk management tools. For example, the terminology lethal take is used in Alternatives 2 and 3 but is described as limited lethal removal in the description of Elk Management Tools on page 4. Also, we recommend that the Park Service mimic predator and animal disease mortality in terms of sex ratio and age distribution when they conduct roundups and lethal removal.

TNC lands - We would allow and potentially encourage the use of the elk management tools listed in the alternatives on our land, while we own it, to help with elk management issues.

Attachment 1. Excerpt from TNCs scoping comments (2006) supporting bison reintroduction on NPS lands.

The Conservancy strongly supports consideration of restoring a bison herd to Park lands, and we concur with the statement that bison are native to the San Luis Valley (p.71). Bison were abundant before the 1850s and were extirpated as a wild species from Colorado and the Southern Rocky Mountain ecoregion when the last individuals were killed in South Park in 1897 (Armstrong 1972). Today, there are no significant herds present in the ecoregion that are managed for the benefit of the species except on the Medano Ranch. Analyses completed by the Conservancy and partners demonstrate that possible repatriation sites are rare and include the Great Sand Dunes landscape. Therefore, the Park Services elimination of bison restoration from detailed consideration (p. 71) will compromise the long-term persistence of one of the Parks unique ecological resources. The Conservancy would

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strongly support the restoration of bison for several reasons:

1. Bison are one of only four native mammal species not currently present in a near-wild state in the ecoregion;
2. Bison are a critical driver of ecosystem processes; and
3. Restoration would provide the Park Service with unique and invaluable opportunity to play a significant role in the restoration of bison locally and in North America.

In addition:

4. Bison restoration would conform with NPS reintroduction policy; and
5. There are alternate views of the reasons that NPS stated for not considering bison restoration.

Each of these points is described in detail below.

1. Bison are one of only four native mammal species not currently present in a near-wild state in the ecoregion. The four species not currently present include bison, wolves, grizzly bears, and wolverine. Of these, land owners and managers are most likely to support the restoration of bison due to the economic and ecological benefits they can provide.

2. Bison are a critical driver of ecosystem processes and are needed to meet the Parks long-term management goals. Our strong support for bison on the Park is based on the fact that bison, and large grazers in general, are significant drivers of ecosystem processes everywhere they occur (Coppock et al, 1983; Frank & McNaughton, 1992; Gibson, 1989; Lott, 2003). Bison have well-demonstrated effects on grassland and soil processes, plant diversity, abundance, and distribution (Cid, 1987; Collins, 1998; Lott, 2003; Yellowstone National Park, 1997), and the diversity and abundance of many other species such as prairie dogs (Krueger, 1986). Their wallows have been shown to have both short and long-term effects on landscape heterogeneity and complexity (Coppedge et al., 1999), as well as plant distribution and abundance (Lott, 2003). The role that bison play in grassland communities affects so many other species both directly and indirectly that they are sometimes referred to as a keystone species.

Because of bisons critical importance to ecosystem functionality, not including its restoration in the Park plan is a critical decision that would seriously limit the Parks potential to restore the systems full spectrum of natural processes. Such a decision would also result in the Parks potential failure to fully protect the long-term persistence of the unique resources for which it was created. In addition, we feel that restoration of bison to Park lands may have an impact on the outcome of the U.S. Fish and Wildlife Services consideration of such a possibility when they complete their long-term management plan for the Baca National Wildlife Refuge.

3. Bison restoration would provide the Park Service with a unique and invaluable opportunity to play a significant national and international role in the restoration of bison.

There are only a handful of places in the United States where non-commercial bison herds currently roam over large landscapes (e.g., Yellowstone National Park, Badlands National Park, Wind Cave National Park, and Custer State Park). To the Conservancys knowledge, the herd on the Medano is the only large, non-commercial herd in Colorado. Opportunities to restore bison are relatively few due to fragmented land ownership patterns, unsupportive policies of some land owners or land managers, and other factors. The Southern Rocky Mountains Ecoregional Assessment (Neely et al. 2001) reported that the Great Sand Dunes National Park and vicinity has the unique situation of having both a landscape and agency policy that can support bison restoration. In addition, bison were native to these lands, and their restoration in the National Park would be relatively cost-effective and efficient due to the presence of bison handling facilities, fencing, and bison management experience on contiguous Conservancy lands. The bison facilities at the Medano Ranch are state-of-the art and only used as absolutely necessary to maintain herd population size.

From a global perspective, bison restoration is a critical issue. There are approximately 500,000 bison in North America, but only about 20,000 are considered conservation viable stock (Joel Berger, Wildlife Conservation Society Senior Scientist, personal communication). The vast majority, some 480,000 animals, are managed as

commercial herds that are usually genetically impure and managed and culled in a manner that makes them of minimal value from a conservation standpoint. Bison that are performing a relatively natural ecological function in native habitat are very rare. Thus, it is critically important to take advantage of significant opportunities to restore bison- -particularly non-commercial herds- -to native lands. This opportunity is particularly important because of the long-term potential for the species within the Great Sand Dunes Complex.

4. Bison restoration would conform with NPS policy. The restoration of bison within the Great Sand Dunes National Park & Preserve would clearly meet NPS policy requirements as described below:

" Adequate habitat exists to support the species. The Conservancy herd of 1200 animals occupies approximately 40,000 acres on the Medano Ranch. Based on observations by the Conservancys Senior Ecologist, the animals range freely within the confines of the fence, require minimal management, and appear to be well below carrying capacity based on the degree of forage utilization even during times of severe drought such as that of 2002. Addition of the Park lands acquired from the Baca Ranch would almost double the size of the bison range and allow a considerably larger herd than now exists on the Medano. A herd of several thousand individuals would be at a level that can sustain genetic diversity over time (Berger & Cunningham, 1994).

" The species can be managed so as not to pose a serious threat to the public. Bison are no more dangerous than other large ungulates, far less dangerous than bears and mountain lions, and there have been extremely few safety problems for humans in parks and preserves where bison/human contacts occur (Lott, 2002). The Conservancy has had no serious encounters or injuries from the bison population on the Medano Ranch even with significant increases in the number of humans interacting with the herd. Bison could easily be restricted by fencing them off from areas of high visitor use, which, in the case of the Great Sand Dunes National Park is the east face of the dune field.

" Genetically pure bison stock is available. Virtually all of the large, public bison herds have been tested for genetic purity, as have many of the private herds. A representative from Yellowstone National Park has stated that Yellowstone will be able to provide genetically pure, brucellosis-free animals for restoration projects in the near future. Wind Cave is already providing genetically pure animals for conservation projects. The nearby private herd on the Vermejo Park Ranch has genetically pure stock in its Castle Rock Herd and its owner expressed in 2005 a willingness to distribute animals from that herd to groups that intend to contribute to the conservation of the species. In addition, the Conservancys Medano herd has been genetically tested and a low level of bovine alleles was found. The Conservancy is currently creating a genetically pure herd by identifying the pure animals (complete) and selectively culling and adding pure stock (planned).

" The species disappeared as a direct result of human-induced change. To the Conservancys knowledge, no one disputes the fact that bison disappeared from the San Luis Valley due to human-induced changes, over-harvesting or introduced ungulate diseases.

5. There are alternative views of NPSs justification for eliminating the possibility of bison restoration. The Draft plan states the following reasons for this elimination. An alternative view of each issue follows:

" Questionable presence of bison. From the available literature, it is difficult to ascertain whether or not the modern species of bison (*Bison bison*) had continuous presence in the San Luis Valley (p. 71). Alternative view: As noted in the draft on page 71, first hand accounts plus the fossil record leave little doubt that bison lived in and migrated through the Valley. While it is true that documentation for the presence of bison in the Valley is scant at best (p.71), the information that does exist is convincing. For example, it is highly likely that bison roamed the San Luis Valley year-round and in sizable numbers based on the amount and type of forage and water available and on their proven ability to prosper on the Medano Ranch year-round. Bison fossils have been found in many of the valleys of the

Central Rockies as far west as Grand Junction (Joe Truett, Turner Endangered Species Fund, personal communication). Bison occurred in other montane parks in Colorado (Armstrong 1972, Meaney and Van Vuren 1993) and at least in South Park occurred year-round.

In the most thorough reviews of bison ecology, it is clear that movements of the species were unpredictable even in the 19th century (Roe 1970; Shaw and Meagher 2000). In other words, they were nomadic rather than migratory (with migratory indicating movements from predictable place to place). Nomadic behavior is a response to variable forage and/or water, so bison wandered to find places of resources and compatible conditions if they were unpredictable or highly variable. In the San Luis Valley, however, forage and water have been relatively predictable and thus would have been appealing to resident bison. This predictability of resources could have reduced their need to move to other locales.

" Insufficient habitat. Today, available bison habitat within the Park is very limited compared to that needed by a wild (unconfined) bison herd on a year-round and year-to-year basis (p. 72). Alternative view: For a herd on Park and TNC lands combined, there is sufficient habitat for a bison herd of a size large enough to allow for a desirable level of genetic diversity (effective population size of at least 500 breeding adults), natural social structure, seasonal movements amongst seasonally preferred habitats, and forage diversity. The fitness and ecological success of the Medano herd attests to the suitability of the dunes complex landscape for the species. Whether a fenced herd can be considered wild or not is a semantic distinction, not applicable to considering a bison herd on Park lands. There are no free-ranging bison herds in the U. S.; all are either fenced in or fenced out. As mentioned above, The TNC herd of 1200 animals (plus this years young) occupies approximately 40,000 acres on the Medano ranch. The animals range freely within the confines of the fence and appear to be well below carrying capacity based on the degree of forage utilization even during times of severe drought such as that of 2002. Their herd behavior conforms to those of other herds in larger areas. Addition of the Park lands acquired from the Baca Ranch alone would almost double the size of the bison range and allow a considerably larger herd and/or more movement.

" Insufficient forage. Also, the abundance of bison forage is quite variable in this area due to limited precipitation and high elevation (p. 72). Alternative view: The amount of bison forage on the Medano Ranch is sufficient for an estimated herd of 2000-4000 animals, even during times of drought. It is likely that the unique hydrological features of this landscape provide for a more consistent abundance of forage than some other parts of the San Luis Valley as indicated in the vicinity of Sand Creek, Big Spring and Little Spring. Therefore, the Conservancy herd of 1200 animals is well below carrying capacity and the addition of Park lands would provide additional forage for a herd that roamed over both Conservancy and Park lands.

" Resource limitations. Bison would have to be intensively managed to maintain herd size and mimic natural grazing impacts. Such management would require a significant amount of the time and energy that would divert resources from other Park needs and projects (p. 72). Alternative view: Management assistance and funds could be found to defray the costs of fencing and personnel to manage a bison herd on Park lands. With herd size maintained within a suitable range, the management of grazing is a simple outcome of natural bison behavior in the landscape.

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PEPC Project ID: 25517, DocumentID: 61149

Correspondence: 10

Author Information

Organization Type:

I - Unaffiliated Individual

Correspondence Information

Status: New

Park Correspondence Log:

Date Sent: 11/02/2014

Date Received: 11/02/2014

Number of Signatures: 1

Form Letter: No

Contains Request(s): No

Type: Web Form

Notes:

Correspondence Text

Topic Question 1:

yes

Topic Question 2:

I think limited, controlled hunting of elk inside the park would be beneficial and could save resources if staff or hired contractors did not have to haze them on to adjacent land.

Topic Question 3:

I like the plan for removing the cow-bison animals and bringing in a small population of genetically pure American Bison from the few existing herds in the country in order to begin a new herd and assist in the genetic diversity of this American icon. I like the proactive management/thinning of the elk population to secure the health of the herd and the habitat in the absence of natural predators. I would like the reintroduction of natural predators to be a possibility.

Topic Question 4:

I think the key issue is to attempt to return the habitat to its most natural state while maintaining areas for controlled public enjoyment before the chance to preserve this sizable area is lost.

Comments: DEAR SUPERINTENDANT CARRICO,

MY NAME IS _____. I AM A RESIDENT OF THE HIGH MOUNTAINS ABOVE SAN

LUIS. MY HUSBAND AND I HAVE LIVED IN THE SANGRE DE CRISTO RANCHES SINCE 2011 AND HAVE BEEN LAND OWNERS, FOUR PARCELS IN THE RANCHE SINCE 2006.

THANK YOU FOR PROVIDING A VENUE FOR PUBLIC INPUT O THIS IMPORTANT DEVELOPMENT IN THE AREA'S HISTORY.

THE AMERICAN BISON IS ICONIC. AS AKID IN THE 50'S I REMEMBER LOOKING THROUGH ALL MY DAD'S CHANGE IN SEARCH OF THE INDIANHEAD OR "BUFFALO" NICKEL WITH THE AMERICAN BISON ON THE BACK AND LEARNING ABOUT THE MILLIONS THAT ROAMED IN HERDS ON THE PLAINS AND PROVIDED SUSTANANCE FOR NATIVE AMERICANS. I ALSO LEARNED OF THE NEAR EXTINCTION OF THE SPECIES BY DROUGHT, COMMERCIAL HUNTING AND SLAUGHTER IN THE 1800'S.

I HAVE VISITED YELLOWSTONE, THE SANDSAGE RANGE IN KANSAS AND THE WICHITA MOUNTAIN WILDLIFE REFUGE IN OKLAHOMA AND JUST LOVED SEEING THOSE BIG BEAUTIFUL

Correspondences - Ungulate Management Plan/EIS - PEPC ID: 25517

ANIMALS AND THEIR ADORABLE CALVES. HAVING DEDICATED SPACES FOR THESE GREAT BEASTS IS SO IMPORTANT TO OUR AMERICAN LEGACY.

SO I WAS THRILLED TO HEAR OF THE PENDING ACQUISITION OF THE MEDANO RANCH, CURRENTLY OWNED BY THE NATURE CONSERVANCY, BY THE SAND DUNES PARK AND PRESERVE AND THE POSSIBILITY OF REINTRODUCTION OF BISON IN THE BACA WILDLIFE REFUGE. WE LIVED IN CLOSE PROXIMITY TO CONSERVANCY LAND IN A RURAL DEVELOPMENT IN THE DAVIS MOUNTAINS OF WEST TEXAS FOR 21 YEARS AND SAW THE POSITIVE EFFECTS OF HABITAT CONSERVATION AND PRESERVATION-BASED MANAGEMENT ON WILDLIFE AND MIGRATORY BIRDS IN THE AREA. THOUSANDS OF VISITORS ANNUALLY CAME TO THE AREA FOR THE EXPERIENCE OF WILDERNESS AREAS AND TO WATCH THE MIGRATING BIRD SPECIES. THE LAND WAS SO VISIBLY IMPROVED BY THE CONSERVANCY PRESENCE!

TO THINK THAT NOW, HERE IN MY BACKYARD IS THE INCREDIBLE POSSIBILITY OF THE SAN LUIS VALLEY, OUR PART OF THE COUNTRY BEING ABLE TO SET ASIDE A REALLY IMPACTFUL PACE FOR THE AMERICAN BISON IS SO EXCITING. FOR YOUR GROUP TO BE ABLE TO BRING IN GENETICALLY UNCORRUPTED INDIVIDUALS AND START TO COLONIZE A HERD THAT CAN BE VIRTUALLY FREE-ROAMING IN A MANNER SIMILAR TO THEIR ORIGINAL LIVES IS SO FORWARD THINKING. I BELIEVE THIS IS THE PERFECT TIME TO MOVE FORWARD WITH THIS ENDEAVOR, RIGHT ON THE HEELS OF OUR GREAT RECOGNITION ON THE U.S. QUARTER! GENERATIONS OF AMERICANS WILL BENEFIT FROM THIS PARTNERSHIP.

THANK YOU AGAIN FOR YOUR CONSIDERATION OF MY INPUT AND THE CARE YOU HAVE TAKEN TO SEEK COMMUNITY COMMENTS.

PEPC Project ID: 25517, DocumentID: 61149

Correspondence: 11

Author Information

Keep Private: No
Name: Christine Canaly
Organization: San Luis Valley Ecosystem Council
Organization Type: P - Conservation/Preservation
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Crestone, CO 81101
USA
E-mail: SLVWATER@FAIRPOINT.NET

Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 11/02/2014 Date Received: 11/02/2014
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:

It is sufficient in terms of this DEIS, but it is unfortunate that predator populations will not be considered.

Topic Question 2:

Please read comments

Topic Question 3:

The alternatives are human centered, but sufficient.

Topic Question 4:

Predators.

Comments: November 2, 2014

Lisa Carrico, Superintendent
Great Sand Dunes National Park and Preserve
11500 Highway 50
Mosca, CO 81146-9798

RE: Ungulate Management Plan and Draft Environmental Impact Statement (DEIS)

Superintendent Carrico;

These brief comments are in response to the Preliminary Draft Alternatives provided in Newsletter 2, published September 2014. We support the National Park Service (NPS) and your efforts to move forward with this Ungulate

Correspondences - Ungulate Management Plan/EIS - PEPC ID: 25517

Management Plan DEIS.

The SLV Ecosystem Council (SLVEC) participated within the Advisory Council for the Great Sand Dunes National Park & Preserve Management Plan, completed in 2007, so we are aware of the "unfinished business" regarding the Ungulate issue. Various Native American tribes attended Advisory Council meetings requesting that the reintroduction of Bison be considered as part of the Management Plan. SLVEC is encouraged to see this issue get the attention it deserves. The eastern unit Elk population, has been an ongoing concern for at least a decade now, so it's essential that these ungulate populations receive scientific study and planning efforts.

The World Wildlife Fund (WWF) announced in early October that there is now only half the mammal population left on earth since baseline estimations were recorded in the 1970's. Most of this mammal hunting, harvesting and loss of habitat have occurred in our oceans, but it serves as a giant indicator regarding the current dilemma of habitat loss concerning these precious species.

SLVEC supports the purpose and objectives of this Ungulate plan, especially regarding the attainment of desired habitat conditions. We look forward to reviewing the details of what NPS prioritizes as a desired condition and how that will be obtained.

We encourage the collaborative partnership between NPS with US Fish and Wildlife Service and continuing to work closely with their National Wildlife Refuge Bison reintroduction study to determine the sharing of a publicly owned wild Bison herd on adjacent Department of Interior properties.

Elk Management will be a key component of this Bison reintroduction effort and SLVEC initially supports the management tool options introduced in the newsletter. We understand that NPS does not intend to carry forward predator introduction and we have a general understanding of the reasons why.

However, we are compelled to say that humans cannot possibly replace other predators, like Wolves, because carnivore's of this nature carry an entire ecosystem with them regarding their interaction with other species on the landscape. The desired future habitat conditions that NPS will be identifying, highlighting and detailing in the DEIS, will most likely contain conditions that only predators like Wolves, reintroduced onto the landscape, would be able to create and perpetuate.

It is unfortunate that we are not culturally ready to fully understand the benefits received by the reintroduction of Wolves into the Sangres and surrounding landscape. SLVEC believes reintroduction has the biological potential to bring health, vitality and some semblance of ecological balance back into this planning area. Perhaps by the time the next NPS Management Plan comes around, cultural barriers and tension will be eased and the reintroduction of a predator as significant as the Wolf will have the potential to become a reality.

Just looking at this reintroduction of Predator from an economic perspective, we are now choosing instead to bring in sharp shooters on a "seasonal" basis, who will have to be paid, when we could have a mammal predator on the landscape working to bring balance 24/7. It's not just that wolves don't receive paychecks or pension, but their impact on the movement of herds, grasses and other flora, cannot be replicated by humans.

The decision not to study the reintroduction of wolves and replace them with sharp shooters, is financially luxurious and only in a place like the United States, with it's complex, super imposing human infrastructure, could we get away with it, for now.

Thanks for your time, devotion and consideration.

Sincerely,

Christine Canaly
Director

PEPC Project ID: 25517, DocumentID: 61149

Correspondence: 12

Author Information

Keep Private: No
Name: Christine Canaly
Organization: San Luis Valley Ecosystem Council
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Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 11/02/2014 Date Received: 11/02/2014
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:
See previous comments

Comments: November 2, 2014
Lisa Carrico, Superintendent
Great Sand Dunes National Park and Preserve
11500 Highway 50
Mosca, CO 81146-9798

RE: Ungulate Management Plan and Draft Environmental Impact Statement (DEIS)

Superintendent Carrico;

These brief comments are in response to the Preliminary Draft Alternatives provided in Newsletter 2, published September 2014. We support the National Park Service (NPS) and your efforts to move forward with this Ungulate Management Plan DEIS.

The SLV Ecosystem Council (SLVEC) participated within the Advisory Council for the Great Sand Dunes National Park & Preserve Management Plan, completed in 2007, so we are aware of the "unfinished business" regarding the Ungulate issue. Various Native American tribes attended Advisory Council meetings requesting that the reintroduction of Bison be considered as part of the Management Plan. SLVEC is encouraged to see this issue get the attention it deserves. The eastern unit Elk population, has been an ongoing concern for at least a decade now, so it's essential that these ungulate populations receive scientific study and planning efforts.

The World Wildlife Fund (WWF) announced in early October that there is now only half the mammal population left on earth since baseline estimations were recorded in the 1970's. Most of this mammal hunting, harvesting and

Correspondences - Ungulate Management Plan/EIS - PEPC ID: 25517

loss of habitat have occurred in our oceans, but it serves as a giant indicator regarding the current dilemma of habitat loss concerning these precious species.

SLVEC supports the purpose and objectives of this Ungulate plan, especially regarding the attainment of desired habitat conditions. We look forward to reviewing the details of what NPS prioritizes as a desired condition and how that will be obtained.

We encourage the collaborative partnership between NPS with US Fish and Wildlife Service and continuing to work closely with their National Wildlife Refuge Bison reintroduction study to determine the sharing of a publicly owned wild Bison herd on adjacent Department of Interior properties.

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However, we are compelled to say that humans cannot possibly replace other predators, like Wolves, because carnivore's of this nature carry an entire ecosystem with them regarding their interaction with other species on the landscape. The desired future habitat conditions that NPS will be identifying, highlighting and detailing in the DEIS, will most likely contain conditions that only predators like Wolves, reintroduced onto the landscape, would be able to create and perpetuate.

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The decision not to study the reintroduction of wolves and replace them with sharp shooters, is financially luxurious and only in a place like the United States, with it's complex, super imposing human infrastructure, could we get away with it, for now.

Thanks for your time, devotion and consideration.

Sincerely,

Christine Canaly
Director

PEPC Project ID: 25517, DocumentID: 61149

Correspondence: 13

Author Information

Organization Type:

I - Unaffiliated Individual

Correspondence Information

Status: Reviewed

Park Correspondence Log:

Date Sent: 11/02/2014

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Number of Signatures: 1

Form Letter: No

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Type: Web Form

Notes:

Correspondence Text

Topic Question 1:

The only alternative missing is the one with a joint management plan for the entire 300,000 acre landscape that includes the Baca, Medano, and NPS lands.

Topic Question 2:

I think you did a great job of articulating that NPS will manage elk in a step-wise fashion, starting with milder treatments and progressing to culling if needed. It would really anger your NPS constituency if GRSA is opened to hunting.

Topic Question 3:

I don't like that FWS is getting part of the Medano. I think NPS should purchase all of it. NPS has a conservation vision for this amazing landscape. FWS apparently does not, judging from their CCP.

Topic Question 4:

Don't be afraid to manage both elk and bison on this landscape. It's not going to be that difficult.

Topic Question 5:

Thank you for your dedication to the park resources. This is important to me and to my children.

Comments: Thank you for the opportunity to provide comments on the Alternatives for the Ungulate Management Plan for Great Sand Dunes National Park. I appreciate the opportunity to be part of the planning.

Comment 1: I favor Alternative Concept 3 because it supports the directive from our Leadership in DOI on the DOI Bison Conservation Initiative (Department of Interior 2014). I applaud the National Park Service and Great Sand Dunes National Park specifically for having a broad conservation vision, and being willing to support bison conservation and the goals of DOI.

However I have concerns about the limitations on the number of bison in that alternative. What science is it based on? Gross and Wang (2005) clearly state that a minimum viable population for genetic conservation would be 1000 animals, so I don't understand why NPS would limit the herd size to 400.

According to the Bison Conservation Initiative report (Dratch and Gogan 2010):

"The participants established the criteria for a wild bison herd as one with a large enough population size to prevent

Correspondences - Ungulate Management Plan/EIS - PEPC ID: 25517

loss of genetic variation and with low levels of cattle or subspecies introgression, and subject to some of the forces of natural selection, including competition for breeding opportunities. The desired minimum size of a population to maintain genetic variation in bison over two centuries is estimated at 1,000 individuals (Gross and Wang 2005, Gross et al. 2006, Boyd et al. 2010). This could be achieved through establishment of a single population or management of several smaller populations as a metapopulation."

Also, in Boyd (2003) the minimum population size for a viable population was suggested to be 400 individuals. Yet 400 is the maximum number of bison listed in Alternative Concept 3. What is the number 400 based on?

I think the habitat condition should guide your management, and clearly if the habitat is stressed, managers will want to respond with appropriate adaptive management. However, the carrying capacity of the landscape has been established to be much larger (Wockner et al. 2014), so what is the justification for limiting the size to 400?

My second comment has to do with the vision for the Baca-GRSA landscape.

Comment 2: Why aren't FWS and NPS developing a joint management plan for the Baca NWR and NPS lands together?

When The Nature Conservancy procured the Luis Marie Baca land grant and made it available to the federal agencies, they envisioned the federal agencies working as partners, not coming up with 2 separate management plans that would split a contiguous landscape in two. For many stakeholders and Colorado conservationists, it looks like the feds won't work together. More importantly, it is a waste of a conservation opportunity. There is tremendous evidence in the scientific literature on the benefits of larger landscapes to meet conservation goals. Larger more contiguous landscapes can support more biological diversity, better preserve evolutionary processes, and absorb ecological perturbations with more resilience than smaller landscapes. To best manage for global climate change, the land should be managed as one landscape, not two separate plans. So why is there no joint agency management plan for the Baca/GRSA landscape?

Thank you for considering my comments. I appreciate being able to participate in proposed plans for this magnificent landscape. And I admire NPS for your vision and leadership. Please continue to persevere for those of us that want and need to have wild places. Please continue to advocate for your NPS constituents.

References:

Boyd, D.P. 2003. Conservation of North American bison; status and recommendations. Master's Dissertation, University of Calgary.

Department of Interior. 2014. DOI bison report: Looking forward. Natural Resources Report NPS/NRSS/BRMD/NRR-2014/821. National Park Service, Fort Collins, Colorado.

Dratch, P. A., and P. J. P. Gogan. Bison Conservation Initiative: Bison Conservation Genetics Workshop: report and recommendations. Natural Resource Report NPS/NRPC/BRMD/NRR-2010/257. National Park Service, Fort Collins, Colorado.

Gross, J. E., and G. Wang 2005. Effects of population control strategies on retention of genetic diversity in National Park Service bison (*Bison bison*) herds. Final Report Submitted to Yellowstone Research Group USGS-BRD, Bozeman, Montana.

Wockner, G., Boone, R., Schoenecker, K.A., and Zeigenfuss, L.C., 2014, Modeling elk and bison carrying capacity for Great Sand Dunes National Park, Baca National Wildlife Refuge, and The Nature Conservancy's Medano Ranch, Colorado: U.S. Geological Survey Open-File Report 2014-1200, 23 p., <http://dx.doi.org/10.3133/ofr20141200>.

PEPC Project ID: 25517, DocumentID: 61149

Correspondence: 14

Author Information

Keep Private: No
Name: Rick Basagoita
Organization: Colorado Parks and Wildlife Official Rep.
Organization Type: S - State Government
Address: Monte Vista Office
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USA
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Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 10/28/2014 Date Received: 10/28/2014
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Letter
Notes:

Correspondence Text

On behalf of the Colorado Parks and Wildlife (CPW), I would like to thank you for the continuous, long-term cooperation between our agencies and the opportunity to comment on the UNGULATE MANAGEMENT PLAN AND EIS as provided by the National Park Service (NPS). My staff and I have reviewed the newsletter, including the suite of alternatives and are providing comments in the format of the questions you pose.

Our comments focused primarily on elk management. Without increased harvest the elk population in this unit will continue to exceed the population objective. In the past 20 years elk have sought refuge and established themselves on areas that are now part of the Great Sand Dunes National Park (GRSA). Without an effective elk dispersal plan elk numbers will continue to grow and a resident herd established, to the point that elk cause great resource damage to the landscape and negative impacts to other wildlife.

The State of Colorado considers bison domestic livestock, so CPW has little role in their management and will have few comments in their regard. Bison are additional AUMs on the range and need sufficient habitat. Bison may out-compete native wildlife for limited resources and may limit habitat utilization by other species.

Is this a sufficient range of alternatives? If not, what other alternative(s) should the NPS consider? Currently the four proposed alternatives offer non-lethal hazing and lethal removal for dispersal by agency sharpshooters. The last three also include lethal removal for population management by agency sharpshooters. CPW believes that the strict adherence to a tiered approach is flawed as it does not take into account elk behavior. CPW understands NPS's desire to take a tiered approach, allowing time to see what happens and to see what is acceptable. However, our experience is that the reverse approach is actually effective. When using lethal removal early, the elk respond immediately and their dispersal behavior changes significantly. Non-lethal harassment is much more effective used

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in tandem with or immediately following lethal removal. It has been our experience that we can remove fewer animals if we begin lethal removal early. We suggest this should be added to your range of alternatives.

Currently, the Medano Ranch is still in private ownership, where hunting has occurred. Hunting and harvest on the Medano Ranch is incredibly helpful in our ability to manage this elk herd. We suggest that allowing hunting to occur on the Medano Ranch (as long as it is in private ownership, up to and including the final closing if and/or when it sells) should be added to your range of alternatives.

Are there specific elements of the preliminary alternatives, including management tools, which should be changed? If yes, how would you change them? Please see previous comments with regard to dispersal techniques and hunting the Medano Ranch.

Wilderness - CPW normally supports wilderness designations for remote, high elevation areas where elk do not congregate, except during the summer months, and are most often forced out as snow begins to accumulate. Wilderness designation on elk winter range creates an entirely different situation. In the context of the Great Sand Dunes National Park, elk could congregate in the area proposed for wilderness and find refuge from hunters or agency personnel. A minimum tools analysis would need to be done for agency personnel to conduct management actions, and the inability to use certain tools could severely hinder CPW's ability to effect management. This is especially true when time is of the essence to address a serious wildlife conflict or management situation.

For the most flexibility for elk management, CPW recommends no wilderness designation or completion of a minimum tools analysis up-front to ensure that CPW staff have the ability to manage big game efficiently and without additional fiscal burdens.

What do you like and/or dislike about the preliminary alternatives? CPW appreciates the cooperation and coordination that has occurred in the development of these alternatives. They clearly reflect the on-going effective communication between our agencies.

What issues should the NPS consider when evaluating future bison and elk management? Elk and bison are both large ungulates that can impact habitats significantly. Elk also have the capability of rapid population growth under some conditions. This population of elk exhibits low calf recruitment, which may slow or limit population growth somewhat. However, this elk herd is significantly over population objectives. While the landscape may appear able to sustain significantly more grazing, there are large tracts of land that are not utilized by elk or bison. Elk and bison have "preferred habitats" that they are reluctant to leave, often until the habitat is over utilized or damaged.

In summary, elk are an important and charismatic species that is challenging to manage. Where public hunting is not available it is more difficult to conduct elk population management and dispersal. CPW asks that the Greater Sand Dunes Ungulate Management Plan provide as much management flexibility and as many management tools (e.g., harassment and lethal removal techniques along with appropriate minimum tools for wilderness areas) as possible.

Thank you for this opportunity to comment. We appreciate your efforts thus far and look forward to future collaboration. If you have any questions or concerns regarding these comments, please contact Rick Basagoitia at (719) 588-8200 or via email at rick.basagoitia@state.co.us.

Sincerely,

Rick Basagoitia,
Area Wildlife Manager - San Luis Valley
xc: SWRO, Area 17

Correspondences - Ungulate Management Plan/EIS - PEPC ID: 25517

PEPC Project ID: 25517, DocumentID: 61149

Correspondence: 15

Author Information

Keep Private: No
Name: N/A N/A
Organization: Habitat Partnership Program ● Official Rep.
Organization Type: O - Civic Groups
Address: 12487 CR 104 South
Alamosa, CO 81101
USA
E-mail:

Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 11/02/2014 Date Received: 11/02/2014
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Letter
Notes:

Correspondence Text

The Mount Blanca Habitat Partnership Program Committee (Mount Blanca HPP) would like to thank Great Sand Dunes National Park Superintendent, Lisa Carrico and her staff for the NPS presentation of the GSD ungulate management plan at our 2014 September meeting, and for the opportunity to be involved in the planning process. Mount Blanca HPP is tasked with acting as a liaison between agriculture interest and Colorado Parks and Wildlife. These tasks include mitigating or preventing big game damage to agriculture products and to fences. Such solutions are achieved by the Mount Blanca HPP Committee being involved in big game management, distribution and habitat improvement projects utilizing funding provided through the sales of big game licenses.

GSD National Park falls in the Mount Blanca HPP area of focus and includes major agriculture land in the Mosca/Hooper area as well as the Blanca and Fort Garland areas. Allowing a large elk population to establish on the GSD Park will only result in negative relations between agriculture land managers, Colorado Parks and Wildlife, and National Park Service.

Mount Blanca HPP is supportive of the NPS plan to establish an active elk management plan which meets the population objectives established by Colorado Parks and Wildlife. Given the current elk population within the GSD Park, lethal take as a population reduction arrangement should be strongly considered as well as elk dispersal plans. Regarding the next few years to develop and implement an elk management plan Mount Blanca HPP would like for GSD to consider re-establishing elk hunting on Nature Conservancy Land within the Park. Even with a small amount of hunting within the Park it will help to keep elk population in check and allow for distribution of elk where harvest may be achieved within the regular elk seasons.

At this time the Mount Blanca HPP has no comment regarding bison management.

Sincerely,

Mount Blanca HPP Committee

Correspondences - Ungulate Management Plan/EIS - PEPC ID: 25517

PEPC Project ID: 25517, DocumentID: 61149

Correspondence: 16

Author Information

Keep Private: No
Name: Steve Forrest
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Organization Type: P - Conservation/Preservation
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Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 11/02/2014 Date Received: 11/02/2014
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Letter
Notes:

Correspondence Text

On behalf of our 1.2 million members and supporters nationwide, Defenders of Wildlife thanks you for the opportunity to comment on the National Park Services' (NPS) Great Sand Dunes National Park Ungulate Management Plan Environmental Impact Statement. Founded in 1947, Defenders of Wildlife is a nonprofit organization dedicated to the protection and restoration of wildlife and plants in their natural communities. Defenders' distinguished record of leadership on America's conservation efforts includes supporting policies and practices that help maintain populations of all of North America's wildlife species. Defenders' 10-year organizational conservation benchmarks include: 1) Ensuring that more than half of the species currently listed under the Endangered Species Act are stable or improving; 2) Ensuring that 25 of Defenders-identified vulnerable species are secure in important ecosystems and focal landscapes; and 3) doubling the acreage of high priority wildlife habitat that is managed for ecological integrity.

Defenders also has an extensive history in working on bison conservation issues, including membership in the IUCN North American Bison Specialist Group. Most recently, Defenders worked to bring Yellowstone bison to the Fort Peck and Fort Belknap Indian Reservations in Montana in 2012 and 2013, respectively, and to successfully defend legal challenges that opposed establishment of bison populations of Yellowstone genetic stock on these reservations and the legal authority of Montana Fish, Wildlife and Parks to manage wild bison. Defenders has worked with both the Fort Peck Fish and Wildlife Department and Fort Belknap wildlife department to initiate bison programs, expand the land base for those bison, and upgrade bison fencing. Defenders manages, with partners Montana Fish, Wildlife, and Parks and four other NGOs, a bison coexistence program on private lands near Yellowstone National Park to offer landowners financial

Correspondences - Ungulate Management Plan/EIS - PEPC ID: 25517

and technical assistance to fence sensitive areas such as gardens or landscaping from roaming bison.

Defenders will also be commenting on the San Luis Valley National Wildlife Refuge Complex Comprehensive Conservation Plan (CCP) Environmental Impact Statement which runs concurrently with the comment period for this EIS scoping. We are hereby incorporating a number of comments provided to the US Fish and Wildlife Service (FWS) as they are relevant to Defenders' contention that the FWS and the NPS must adopt a joint management planning effort on behalf of bison, and likely other species that share landscape-level resources with both the FWS and the NPS.

Defenders requests the Park Service and Fish and Wildlife Service to collaborate on establishing a publicly-owned herd of wild, wide-ranging bison on Refuge and Park lands. This is a great opportunity to bring two Department of Interior agencies together to help restore America and Colorado's wildlife legacy, and is consistent with the Department of Interior's Bison Initiative. To this end we support, for bison, and in part, the Refuge's Alternative B2, together with the NPS's Alternative Concept 3, to the extent that they create habitat for bison on FWS and NPS lands. Together, these proposals could create thousands of acres of habitat for publicly-owned wild bison and opportunities for Coloradans to experience bison at a scale that would be an inspiring wildlife spectacle.

However, we would argue that the NPS cannot realistically execute bison management independent of the FWS. By all rights, planning for bison, and probably for a host of other species which transit the two jurisdictions, should be conducted under a single planning process that addresses the unique responsibilities and regulatory frameworks for both agencies. We therefore urge the NPS to adopt additional language in its preferred alternative that would establish a common planning process for bison that would apply to both the FWS and NPS lands where bison are contemplated to be managed, and to incorporate by reference the outcome of that joint plan as part of the ungulate management plan to guide bison management going forward.

On the NPS range of alternatives

Defenders finds it somewhat arbitrary that the NPS would present a choice between continuing with the existing TNC herd at approximately the current stocking rate (approximately 400-1,000 head) or bringing in an outside herd at a much reduced number (200 head) to be managed at a much lower stocking rate of 100-400. There is no clear rationale why a conservation herd of outside animals could not be maintained at a much higher stocking rate, or why TNC animals could not be reduced to achieve a much lower stocking rate. These seem to be independent criteria that should be evaluated on their own merits. Defenders supports full ecological recovery of bison on grasslands that will support bison. The San Luis Valley bison landscape (comprised of the Baca NWR, GSDNP, and adjacent federal and private lands) is one of 25 important bison landscapes identified by Defenders and others (e.g., DOI 2014). Defenders would argue that the NPS should manage bison to achieve the highest stocking level possible subject to resource (forage) constraints, regardless of their origin.

Second, Defenders, like most conservation organizations, has adopted the recommendations of the IUCN Bison Specialist Group, that concerns about cattle DNA introgression pose potential problems to the future of the wild bison genome in some instances. We therefore also applaud the NPS for considering replacement of potentially cattle-introgessed TNC bison. It may be a better strategy over the long term to go down this path than to discover at some point in the future that deleterious and non-adaptive cattle genes are interfering with bison reproductive success or

physiological efficiency. Replacement to a non-integrated standard may, over time, also result in more consistent management among DOI herds in general.

Specific elements of the preliminary alternatives, including management tools

Fencing

As we discussed above, managing this herd separately from any herd established on the Baca NWR seems ludicrous given the obvious linkages between environmental elements and the current management regime of bison on the Medano Ranch . . . therefore the need for a fence along the western boundary of the Park is unneeded and unwarranted. We have indicated in our comments to the Baca NWR the following:

"The FWS has not provided any science as to its choice for area selected as bison habitat or estimates of forage production for this unit. While the perimeter identified seems to encompass a large amount of shrubgrass, it also appears to be about 40% sabkha (sandsheet) habitat, and virtually no wet meadow habitat, which is preferred bison habitat (Schoenecker 2012). These wet meadows are highly resilient to grazing (Schoenecker 2012) and would seem to be ideal bison habitat, as opposed to the sabkha, which is avoided by ungulates. Moreover, bison in proximity to but fenced out of adjacent prime habitat are more likely to break out of their confinement to access this habitat if it is not available to them. Finally, if the FWS is interested in understanding the relationship of ungulates and grazing and its effects on other Refuge resources then it needs to include the entire range of habitat types found on the Refuge, not simply shrubgrass and sabkha. The area identified is both inadequate in size and does not encompass actual bison habitat. We suggest that a much larger area that encompasses at a minimum the wet meadows of Cottonwood and Willow Creeks and ideally most of the area to the northeast corner of the Refuge be available to bison. To the extent that the area identified is the fullest extent of expected bison use on the Refuge, the alternative does not appear to represent a viable management option for bison and thus does not actually represent a "range of alternatives" as required by NEPA."

Based on our comments, we cannot describe the area of adjacent NPS lands that might warrant a fence along the western border of the Park. Indeed, this seems to be an ideal question that would be better suited to a joint management plan that took into account preferred bison habitats and obvious connectivity between preferred bison habitats.

Second, Defenders recommends that any fencing used in the park to confine bison should be permeable to other wildlife. Defenders has worked extensively with a number of Tribes and others on bison containment, and can provide numerous examples and specifications for wildlife-friendly bison fencing. Defenders will not support any alternative that envisions bison separated from other wildlife by an impermeable fence.

Public access

While Concept 3 discusses public viewing of bison, and fencing will be done to maximize access to the bison to the Park, it's important to note that many wildlife refuges and National Parks have bison present on the landscape and public hiking trails, drive-through roads, pullouts, picnic tables, campgrounds and so forth exist within areas where bison are also present on the landscape. With few exceptions, most due to poorly policed human behavior, are there any negative interactions between people and bison.

Defenders therefore supports keeping bison access open to the public. Separating wildlife from

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people via a fence simply reinforces misconceptions about the bison as wildlife. Opportunities for viewing bison without being separated by a barrier should be part of the design strategy for incorporating the herd into the Park's wildlife.

Other issues the NPS should consider

The NPS should articulate its strategy for maintaining population targets for bison. This has proven to be controversial in some Park units, but amazingly uncontroversial in others. Defenders believes that the public will be more supportive of future management actions if it knows and is willing to buy into population regulation strategies that are developed as part of a reintroduction plan. Again, if this plan is developed with other key landowners in bison management, there may be a wider range of alternatives for managing bison surpluses than the Park is able to do on its own.

Defenders suggests that the NPS consider the following:

- " Introduce small conservation bison herd of outside origin (e.g., 25-100)
- " Bison introduced would report negative for diseases of regulatory concern
- " Work with the FWS to create a management plan that integrates bison management on both jurisdictions
- " Expand bison fencing to maximize bison range on NPS land during the life of the plan
- " Bison managed within a population range as resource conditions allow (e.g., 400-1,000)
- " Minimum human handling/intervention except as needed to protect resources
- " Potential to expand bison range beyond NPS borders with willing neighbors on adjacent lands
- " Develop interpretation/ education opportunities along Alamosa County Road Lane 6 North (e.g., vehicle pullouts) and public access trails.

Thank you for the opportunity to comment. Defenders looks forward to working with the NPS on bison conservation and for the opportunity this EIS provides to establish a roadmap for an important public conservation herd.

Sincerely,
Steve Forrest
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Rockies and Plains Office
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References Cited

Schoenecker, K. 2012. Ecology Of Bison, Elk, And Vegetation In An Arid Ecosystem. PhD Dissertation, Colorado State Univ., Ft Collins. 95pp.

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Correspondence: 17

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Correspondence Text

On Friday, August 24, 2014 Defenders of Wildlife asked our online community in Colorado to write in support of bison in the Baca National Wildlife Refuge and Great Sands Dunes National Park. Since then, we have collected 940 signees. The petition is as follows:

As a Coloradan, I urge the National Park Service (NPS) and the U.S. Fish and Wildlife Service (FWS) to collaborate on establishing a publicly owned herd of wild, wide-ranging bison on the Baca National Wildlife Refuge and in the Great Sands Dunes National Park. This is a great opportunity to bring two Department of Interior agencies together to help restore our wildlife legacy. I support in part the FWS_ Alternative B2 and the NPS Alternative Concept 3, to the extent that they create habitat for bison on Refuge and Park lands. Together, these proposals would create thousands of acres of habitat for publicly-owned wild bison and opportunities for Coloradans to experience bison at a scale that would be an inspiring wildlife spectacle.

However, both agencies must do more. The FWS proposal to study bison for five to ten years ignores the fact that bison on a nearby Nature Conservancy property have provided ample experience on how bison will use this habitat, and we believe the FWS can move much more quickly to expand habitat for wild bison. Additionally, the NPS should aim for full ecological restoration of wild bison, not settle on an arbitrary choice of either high-density domestic bison or low-density wild bison.

I, therefore, support full ecological restoration of wild bison on the Baca National Wildlife Refuge and in the Great Sand Dunes National Park, as well as connectivity between the two via purchase of key lands from the Nature Conservancy, which is consistent with the purposes of the Refuge and

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the Park. To this end, I urge the NPS to amend Alternative Concept 3 to include the option of increasing the population of bison to 400-1,000 (or more), consistent with resource capability, and for the FWS to adaptively manage, rather than experiment, with a bison population consistent with that target.

Furthermore, I hope that the Park and Refuge will not maintain separate herds but instead jointly manage a larger herd that can roam across a larger area. Maintaining two separate herds and two separate management programs seems not only an incredible waste of public resources but also of an opportunity to demonstrate to the public that federal agencies can cooperate for the greater good. Thank you for the opportunity to comment and for this fantastic opportunity to grow a very special conservation herd of bison in a restored grassland of North America.

Enclosed is a CD containing the names of the signees.

Sincerely,
Defenders of Wildlife

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Correspondence: 18

Author Information

Organization Type:

I - Unaffiliated Individual

Correspondence Information

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Correspondence Text

Thank you for the opportunity to comment on the Draft Ungulate Management Plan and Environmental Impact Statement. I am support of the Alternative Concept 3: Conservation Herd/Comprehensive Management with a few additional thoughts:

Semi-free ranging bison population: I believe it would be optimal to have a rather small conservation herd (>200) given the soils, vegetation types, potential for long term drought, and climate change. Evidence is lacking, but my sense is that bison were not in the San Luis Valley in great numbers as they were in the other mountain parks such as North, Middle and South Parks. My experience doing archaeology in parks to the north suggest a much larger population there given the remains one still finds on the ground. The paucity of written accounts of Valley bison and actual skeletal remains suggest perhaps they wandered the vast valley in small numbers; avoiding the wetlands and often migrating between the Rio Grande and Gunnison watersheds.

A lack of natural predators and a continued decrease in federal funding to the Parks may make it very difficult to adequately manage a larger population in a confined area. The herd would need to be moved frequently in order that archaeological sites are not destroyed; especially those around the artesian springs. That all said, a conservation herd may be useful for maintaining a rich genetic pool of native bison in North America, eradicating weeds, and providing a memorable experience to visitors. Tribes that maintain cultural affiliation to the San Luis Valley have also expressed interest in receiving bison meat or parts in the event of a take and have also expressed interest in the take themselves. Several Tribes in the west are well versed in managing their own bison herds in the west (Northern Ute, Lakota). The NPS would need to authorize adequate funding to manage such a herd at the GSRA. The land Between the Lakes Forest service Demonstration Unit also runs a small herd of bison, some of which it auctions off to help off-set the cost of management.

Elk Herd Management: I strongly support more aggressive elk herd management within the GSRA, including lethal take. The high population is taking a toll on archaeological sites on FS, USFWS and NPS lands in the territory. The lack of natural predators, soil and vegetation types, long term drought and climate change make it impossible to have elk numbers as they are today without severe impacts to the locals systems.

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Thanks so much for the opportunity to comment!
Sincerely,