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Officially known as the Zuni Tribe of the Zuni Indian Reservation

06 February 2017

Mr. Brent Rhees, Regional Director
Acting Secretary's Designee
Glen Canyon Dam Adaptive Management Program
Bureau of Reclamation
Upper Colorado Region
125 South State Street, Room 8100
Salt Lake City, Utah 84138-1147

Dear Mr. Rhees,

For the past nine (9) years the Pueblo of Zuni has voiced disapproval and opposition to all management actions involving taking of life within the Grand Canyon and the Colorado River ecosystem below Glen Canyon Dam. This objection is founded on the Zuni familial relationship to all aquatic life and our deep cultural, religious, and spiritual reverence for all life. Over the years, the Federal Government responded to Zuni concerns by designing stricter mechanical removal triggering criteria based on humpback chub population estimates and requiring that all brown trout removed from Bright Angel Creek be respectfully processed for human consumption, an acknowledgement of beneficial use requested by Zuni. The Pueblo of Zuni recognizes and appreciates this level of consideration and effort that the Bureau of Reclamation, the National Park Service and the U.S. Fish and Wildlife Service have demonstrated in response to these expressed Zuni concerns.

It has been brought to my attention, however, that during the recent Annual Reporting meeting and subsequent Technical Work Group meeting, presentations were made on the increasing numbers of brown trout in the Lees Ferry reach causing concern for their potential negative effect on the rainbow trout fishery at Lees Ferry and the population viability of the endangered humpback chub. Management options currently under consideration to control those increasing numbers include the mechanical removal of brown trout within the Lees Ferry area. Presentations also suggested that the increasing numbers of brown trout in the Lees Ferry reach may be an unintended consequence of several recent annual fall high flow experimental releases (HFEs) from Glen Canyon Dam that stimulated brown trout reproduction.

The purpose of this letter is to notify you and reiterate the Pueblo of Zuni's position against any management action designed to control brown trout numbers involving electro-fishing and the euthanizing of captured non-natives from the Colorado River downstream (Lees Ferry) from Glen Canyon Dam. It is disconcerting to me that the Pueblo of Zuni was first made aware that this potential management option was under consideration during a public annual reporting meeting and that Zuni was not afforded the courtesy of being consulted prior to its public announcement.

In my, 04 May 2016, letter to the Bureau of Reclamation and the National Park Service transmitting the Pueblo of Zuni's comments on the public draft of the Glen Canyon Dam Long Term Experimental and Management Plan Environmental Impact Statement, I underscored the Zuni perception of a cause/effect relationship that exists

between the Grand Canyon and the Pueblo of Zuni. As an example of this relationship, I conveyed the Zuni religious leaders expressed concern that the ongoing mechanical removal of trout from Bright Angel Creek was perceived as contributing to the increasing number of Zuni community members dying on a daily basis at Zuni. The Zuni religious leaders emphasized that what happens on the Colorado River in Grand Canyon directly impacts Zuni. It was further stated that the implementation of trout removal and trout management flow program characterized in the preferred alternative would result in unknown and un-quantifiable negative effects at Zuni that may include an increase in social problems and mounting psychological stress among Zuni individuals. I criticized the document's failure to adequately address and consider the long-term physical and psychological impacts to the Zuni community that may result from implementing non-flow management actions that are purposefully designed to destroy thousands of non-native fish and perhaps collaterally annihilate countless numbers of aquatic insects, amphibians, and other life forms. Given the current discussion of brown trout removal in the Lees Ferry reach, I am left wondering whether the gravity of the Zuni concern expressed in my letter was fully comprehended by the Glen Canyon Dam Adaptive Management Program.

My concern that the Glen Canyon Dam Adaptive Management Program has not fully appreciated the ramifications of the expressed Zuni concerns with the taking of life in the Grand Canyon is strongly supported by recent management actions implemented by the National Park Service to control green sunfish. In both incidents, piscicides were released into the Colorado River to euthanize the invasive non-native green sunfish. Today, the problem is with brown trout and the proposed typical solution is to mechanically remove-euthanize-the trout. This is indeed troubling to Zuni, because, in part, it demonstrates the program's reliance on a reactionary ecosystem management philosophy rather than implementing a more proactive philosophy that seeks to identify and control antecedent conditions before they become undesired conditions. The Zuni religious leaders were consulted prior to the implementation of the past management actions to control the green sunfish during which the Zuni religious leaders acquiesced with an understanding that this would be an exceptional, not a common, event. Yet, less than six months later, the use of lethal measures to control brown trout numbers within the Colorado River ecosystem is again being seriously considered despite the Adaptive Management Program having been informed on how this will impact Zuni. This sends a strong negative message to the Zuni people.

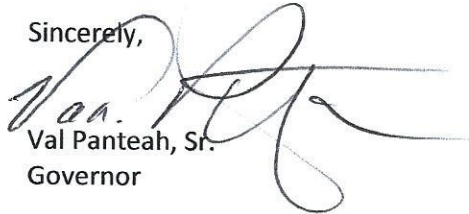
I would like to remind Reclamation that in 2010 the Zuni Tribal Council passed Resolution M70-2010-C086 which calls upon the United States Department of the Interior to "consult in good faith with the Zuni Tribe in seeking and reaching agreement with the Zuni Tribe about measure to avoid, reduce, compensate for, or otherwise mitigate any adverse effects on tribal cultural and spiritual values and interests in the Grand Canyon that are the result of mechanical removal management actions." In addition, the Resolution asserts "... that the Grand Canyon, from rim-to-rim, and all specific places located therein including the confluence of the Colorado and Little Colorado Rivers, topographic and geologic features, springs, archaeological sites, mineral and plant collection areas, and any other places it so identifies as historically, culturally, or spiritually important to the Zuni Tribe within the Grand Canyon must, as a matter of the United States government's trust responsibility toward the Zuni Tribe, be assumed by all federal agencies to be eligible for the National Register of Historic Places." Any proposed mechanical removal of brown trout from the Lees Ferry reach will be viewed by the Pueblo of Zuni as an adverse effect on this Zuni traditional cultural property that is eligible for listing on the National Register of Historic Places.

Any future consideration of brown trout removal and/or efforts to initiate environmental and historic preservation compliance must, by law, include meaningful involvement and consultation with the Pueblo of Zuni by the Bureau of Reclamation. The Pueblo of Zuni anticipates a candid and productive dialogue with Reclamation regarding the brown trout issue currently under consideration and the expressed Zuni concerns contained in this

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letter. If you have any questions or need further information please contact Mr. Kurt Dongoske, Tribal Historic Preservation Officer and Technical Work Group representative at 505.782.4814.

Sincerely,

A handwritten signature in black ink, appearing to read "Val Panteah, Sr.", with a large, stylized flourish extending to the right.

Val Panteah, Sr.
Governor