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Officially known as the Zuni Tribe of the Zuni Indian Reservation

**GOVERNOR VAL PANTEAH, SR.'S STATEMENT
ON THE PROPOSED STOCKING OF RAINBOW TROUT AT LEES FERRY
BY ARIZONA GAME AND FISH DEPARTMENT
PRESENTED TO THE GLEN CANYON DAM ADAPTIVE MANAGEMENT WORK GROUP
PHOENIX, ARIZONA
FEBRUARY 14TH, 2018**

I appreciate this opportunity to address the Secretary's Designee and members of the Glen Canyon Dam Adaptive Management Work Group on the proposed stocking of rainbow trout at Lees Ferry by the Arizona Game and Fish Department. The Pueblo of Zuni was made aware of the intent to stock rainbow trout during the last Technical Work Group's teleconference meeting on January 25, 2018. Today, you heard Mr. DeVos further explained his agency's decision to consider stocking rainbow trout within the Lees Ferry reach. The Pueblo of Zuni would like to share with you several concerns related to this proposed action.

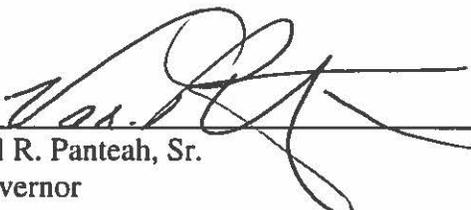
Foremost, over the past fifteen years, federal and state agencies have consistently asserted that the primary threat to the continued existence of the endangered native Humpback chub came from predation and competition by the non-native rainbow and brown trout. Rainbow trout were regarded as a greater threat simply because of their substantially larger numbers. From 2003-2006, mechanical removal efforts occurred at the confluence of the Little Colorado and Colorado Rivers specifically targeting the removal and euthanasia of rainbow trout in response to their perceived threat. This perspective has apparently not changed over the succeeding years, because currently the National Park Service, in response to increasing numbers of non-natives, is generating an environmental assessment on a proposed expanded non-native aquatic species management plan for Glen Canyon National Recreation Area and the Grand Canyon National Park. Underscoring the National Park Service's position, is the fact that mechanical removal and trout suppression flows are part of the Biological Opinion conservation measures associated with the Long Term Experiment and Management Plan for the Glen Canyon Dam.

The Pueblo of Zuni is concerned that the proposed stocking of rainbow trout at Lees Ferry is incompatible and in management conflict with the National Park Service's efforts to develop an expanded non-native aquatic species management plan and with the adaptive management program's developed goal to enhance the population of Humpback chub and other native fish species within the Colorado River ecosystem through Grand Canyon. Moreover, the Pueblo of Zuni is concerned about the potential for unintended consequences resulting from this stocking should rainbow trout population numbers rise to a point that triggers implementation of a mechanical removal management action. Should such a scenario occur, whether directly or indirectly, as a result of the proposed stocking, it will result in disproportionately negatively affecting the Zuni people, our special relationship to this sacred place, and our familial and stewardship responsibility to the Colorado River aquatic life. This negative impact on the Zuni community

will raise significant environmental justice issues necessitating the responsible federal agency and the Adaptive Management Work Group's reconsideration of the program's resource goals and the level of commitment of all participating stakeholders to those goals.

I am confident that every member of the Adaptive Management Work Group is very familiar with the Pueblo of Zuni's established objection to management actions that entail the taking of life, especially aquatic life. I am disappointed at the absence of prior federal notification and consultation to inform Zuni about this proposed stocking effort. It is our understanding that the U.S. Fish and Wildlife Service is contributing funding to this stocking effort which should have initiated compliance with Section 106 of the National Historic Preservation Act and necessitated consultation with the Pueblo of Zuni. Additionally, the National Park Service may have a compliance responsibility associated with authorizing access and release of rainbow trout into the Colorado River at Lees Ferry. If that is indeed the case, then Zuni expects the National Park Service to carry out meaningful consultation with the Pueblo of Zuni.

The Zuni's historical, cultural, and spiritual relationship to the Colorado River and the Grand Canyon was established a millennia prior to the arrival of Europeans to this continent. In spite of an unfortunate oppressive history, the Zuni have maintained our spiritual connection to this important sacred place. As such, Zuni knowledge sovereignty of the Colorado River and Grand Canyon must be respected and treated on an equal basis with Western science generated knowledge by this adaptive management program.



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