
From: Kurt Dongoske [kdongoske@cableone.net]
Sent: Tuesday, January 05, 2010 8:44 AM
To: Shane Capron; Larry Stevens; Bill Persons; Bill Werner; Perri Benemelis; Heuslein, Amy; Cantley, Garry; Christopher S. Harris; McClain Peterson; William E. Davis; Glen Knowles; Tim Steffen; Caramanian, Lori; Charley Buletts; LeAnn Skrzynski; Mark Steffen; Michael Yeatts; John O'Brien; Rick Johnson; Balsom, Jan; Hahn, Martha; Henderson, Norm; Mietz, Steven; Clifford Barrett; John W. Shields; Dwight Randolph Seaholm; Ted Kowalski; Jay C. Groseclose; Kubly, Dennis M; Ostler, Don; Whetton, Linda A; Crawford, Marianne; Ryan, Thomas P; Robert King; Mary Barger; Clayton Palmer; Kerry Christensen
Cc: Christian Lyons; Alpine, Andrea E; Bennett, Glenn E; Fairley, Helen; Hamill, John F; Kitchell, Kate; Andersen, Matthew E; Daugherty, Mary M; Grams, Paul E; Mankiller, Serena; Melis, Ted
Subject: Re: GCMRC presentation for TWG Conference Call January 5, 2010: Nonnative fish plan, 9-12 MDT

Shane and fellow TWG members,

The Pueblo of Zuni believes that a vote on the Non-native Fish Control Plan is premature at this time for the following reasons:

1. a vote on the Nonnative Fish Control Plan by the TWG at this time will send an unintended message to the Zuni people (and perhaps the other participating Tribes) that their cultural issues surrounding mechanical removal are of little significance to the Glen Canyon Dam Adaptive Management Program; especially since the consultation status of the Zuni issue regarding the mechanical removal of trout raised in Zuni Governor Norman Coeoyate's letters to the Bureau of Reclamation, the U.S. Fish and Wildlife Service, and the Grand Canyon Monitoring and Research Center, remains unresolved.

2. The Department of the Interior and the Pueblo of Zuni are in the initial stages of consultation regarding the mechanical removal issue and the results of that consultation may have an impact on how, where, if and in what form mechanical removal continues as a management action. As part of that consultation and as a component of the AMWG's recommendation to the Secretary of the Interior regarding the FY2010/2011 work plan and budget, the Pueblo of Zuni requested a rigorous evaluation of the science supporting the assumption that rainbow trout predation on young humpback chub is negatively impacting their population numbers. The results of this consultation and the science analysis could impact the assumptions about nonnative fish and mechanical removal that are currently a fundamental part of the Nonnative Fish Control Plan.

3. There is a scheduled consultation meeting on 13 January between the participating AMWG tribal groups and the DOI agencies during which the Pueblo of Zuni anticipates a resumption of the dialogue about mechanical removal. The development of a TWG recommendation to the AMWG on the Nonnative Fish Control Plan is premature on 05 January given that the results of the 13 January consultation meeting could have an affect on a TWG vote; especially how Department of the Interior agencies view this issue.

4. The TWG membership, the TWG chair, and GCMRC are fully cognizant of the Pueblo of Zuni's concerns regarding mechanical removal and that a consultation process regarding this issue has been started; yet, they have decided to move forward with approving a plan that contains the very management component that the Pueblo of Zuni has questioned. This is not the message I think you want to send to the participating tribal entities.

5. To date there has been no efforts to consult with the participating tribes regarding the Nonnative Fish Control Plan. A vote by the TWG on this plan prior to the conclusion of formal consultation with the tribes about this plan appears to be contradictory to the Tribal Consultation Plan developed between the Department of the Interior agencies, Western Area Power Administration, and the tribes. The Tribal Consultation Plan was developed and approved over a long eight year period. GCMRC does not believe it is their responsibility to consult with the tribes regarding this plan leaving the tribes wondering which Interior agency has that responsibility. Clearly this is a disconnect for the entire Adaptive Management Program. In addition, I think it sends an unintended negative message to the participating tribes to disregard the Tribal Consultation Plan on this important issue and prematurely approve the Nonnative Fish Control Plan.

Thank you for considering my concerns regarding this plan and the pending TWG conference call.