

Dear Mr. Shanahan and TWG members,

The Pueblo of Zuni has received and reviewed the “**Potential August 8 Motion on the Budget Recommendation to the Adaptive Management Work Group**” developed unilaterally by the Bureau of Reclamation and presumably other Department of the Interior agencies. Zuni is extremely disappointed that the proposed Zuni language addition to the July 31, 2024 TWG meeting draft motion to AMWG was unilaterally dismissed and deleted by Reclamation without prior communication and engagement of official Zuni representatives to the GCDAMP. Unfortunately, this is not surprising, but is consistent with the failure of the DOI to engage the Pueblo of Zuni in meaningful and productive consultation, and further promotes the one hundred and seventy-four years of colonial oppression that characterizes the U.S. government’s treatment of Southwestern sovereign tribal nations since the Mexican American War.

The GCDAMP has for close to thirty years implemented a Department of the Interior consultation practice that can be categorized as disingenuous; consistently characterized by federal public rhetoric regarding collaborative Tribal engagement that is often and repeatedly contradicted by federal agency actions as this new proposed motion and the recent final LTEMP SEIS confirms. Furthermore, within the past year, the Acting Secretary’s Designee and Reclamation’s Chief of the Adaptive Management Program met with the Zuni Governor and Tribal Council in Zuni. This was considered a perfect opportunity for a candid and productive conversation with Zuni about the long-standing Zuni issue of objection to lethal management action on non-native aquatic species in the Glen and Grand Canyons. During this meeting, various Zuni Tribal Council representatives asked directly and repeatedly of the federal representatives, “what is it that you don’t understand about the Zuni position on the sanctity of life and the adverse effects to Zuni from lethal management actions in a sacred place?” The Bureau of Reclamation representatives remained silent and a meaningful opportunity to directly and productively address this issue was lost. Once again, demonstrating that Zuni tribal issues are not consider worthy of respect from the U.S. government.

Similarly, in a recent meeting between the Grand Canyon Monitoring and Research Center and the Zuni Governor and Tribal Council regarding the draft triennial work plan and budget collegial exchange of information was achieved, but it lacked a meaningful discussion or response to the Zuni issues and concerns regarding the proposed triennial work plan that were conveyed in the Zuni July 22, 2024 letter to Dr. Andrew Schultz, Chief, GCMRC.

Zuni would like to take this opportunity to remind Reclamation, GCMRC and the varied DOI agencies represented in the GCDAMP that consultation must not be conducted deceptively. That is, its purpose and outcomes predetermined or decided unilaterally. It must not be shrouded in the opaqueness of bureaucratic jargon or purposeful exclusionary bureaucratic densities. It must not build walls of hollow mathematical complexities for scientists beholden to settler colonial power to hide behind to enjoy undeserved sanctuary from critics from other fields and the public. It must not be disrespectful or dismissive of Tribal self-determination and political and “knowledge sovereignty.” Most vitally, it must not work to undermine federal responsibilities of and for equity and justice—as it continuously does when approached as “nonbinding, for advisory purposes only” reviews, burdensome “procedural hoop[s]”, and “rote and less-than-rigorous” hollow “box-checking” exercises. Unfortunately, the DOI’s consultation with Zuni concerning the proposed 2025-2027 triennial work plan and budget **has successfully met all the criteria of what consultation must not be.**

The Pueblo of Zuni objects to the proposed “potential August 8 motion” because it has unilaterally deleted the proposed Zuni paragraph for AMWG consideration that stated:

“GCMRC and Reclamation shall carry out government-to-government consultation, with mindfulness to include the various relevant Executive Orders issued by President Biden since January 2021, with the Pueblo of Zuni Tribal Council regarding the draft 2025-2027 triennial work plan and budget.”

Furthermore, the statement “The following tribal prioritization of unfunded projects in the proposed TWP may be proposed when funding is available through the Reclamation budget or non-GCDAMP funds” is erroneous in that Zuni never participated in the four Tribes prioritization exercise and refused to do so because of the Zuni objections to many of the proposed listed projects (D.4, D.5, and J.3) which have not been appropriately or meaningfully discussed or resolved. This statement also presents the Tribes as monolithic in the GCDAMP and fails to identify the five Tribal Nations as sovereign political entities with specific knowledge that is critical and necessary to the Department of the Interior in stewarding and managing this sacred place, but is apparently being consistently ignored by the DOI agencies.

The Pueblo of Zuni identifies these practices of marginalizing or altogether eliding the specificities of Zuni Indigenous Knowledge and the Pueblo of Zuni as the sovereign holders of aspects of best available science as ongoing reproductions and perpetuations of what the White House recently acknowledges has occurred and continues to occur “from a lack of awareness, unfamiliarity and methodological dogma, and, too often, racism and imperialism.” In these unethical acts that appear are meant to again normalize and impose white possessive biases, epistemologies, and axiologies on all Native concepts, relationships, and practices of land, water, space, time, and society, Reclamation and GCMRC are once again demonstrating that the processes identified by the White House that these are in fact three entangled efforts to continue containing and erasing the Pueblo of Zuni from our ancestral lands, airs, and waters. These are not “objective,” “neutral,” or “value-free” acts by Reclamation and GCMRC staff and personnel, but purposeful regenerations of imperialistic and racist processes of attempted erasure.

The Pueblo of Zuni chooses to not participate in the Technical Work Group’s virtual conference call tomorrow as an *act of protest* to the unethical way the triennial work plan and budget is being advanced to the Adaptive Management Work Group in spite of the stated insufficient consultation with the Pueblo of Zuni and as an apparent self-serving effort by the Bureau of Reclamation and the Grand Canyon Monitoring and Research Center. Through this email the Chair of the Technical Work Group is notified that Zuni votes “**No**” to the draft motion proposed, or any offered revised motion, to move this triennial work plan and budget forward to the AMWG. As an intended result, the TWG will not be able to report a consensus in moving this motion forward to the AMWG; Zuni requests

and expects the Chair of the Technical Work Group to read verbatim this email as part of the Chair's report to AMWG. Be it further known that the Pueblo of Zuni will begin the official process of requesting government-to-government consultation directly with the Secretary of the Interior concerning this program and the repeated failures of the Department of the Interior to meaningfully and respectfully comply with multiple Executive Orders concerning tribal consultation, tribal equity and tribal knowledge sovereignty. This is an unfortunate state of affairs, but the Pueblo of Zuni believes it is the only appropriate approach forward, because past and current Zuni attempts to be collaborative have been exploited or ignored by the DOI agencies.

Respectfully,

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Zuni Cultural Resource Enterprise

