

September 7, 2011
Tusayan Council Hearing: Ten-X Annexation
Presented by Alicyn Gitlin,
Sierra Club Grand Canyon Program Coordinator

Mayor Bryan, Council Members:

Thank you for taking our comments on Tusayan's proposed annexation. My name is Alicyn Gitlin and I am here representing the Sierra Club's Grand Canyon Chapter. Our 12,000 members have significant interest in this area - they enjoy hiking, wildlife viewing, and more in the Grand Canyon and the Kaibab National Forest. We have long advocated for this area's protection.

We respect Tusayan's struggles to improve residents' standards of living, but implore you to first consider the capacity of the land, and the natural resources that draw people from across the planet to enjoy northern Arizona. We hope you will find a way to address the needs of those who live and work here, without squandering precious water and damaging our forests and viewshed.

The Town of Tusayan is considering annexation concurrent with rezoning to allow construction of thousands of new residences, far beyond the needs of the current community. Meanwhile, the Town struggles to identify a reliable water supply. Its wells draw water up a half mile at a tremendous energy cost, with two wells yielding 145 gallons per minute combined (I believe that's 2 out of 3 total wells?) – not enough to supply thousands more people. Montgomery and Associates' water supply study found for the Tusayan Growth EIS, as reported in the Grand Canyon National Park Water Supply Appraisal Study¹: “every gallon of water withdrawn from the Redwall-Muav aquifer would result in a gallon of water being removed from discharge to springs in the Grand Canyon.” That includes springs in the National Park, Havasupai, and Hualapai Reservations. Indian Garden Spring is projected to lose 15% of its flow if Tusayan drills more wells².

The Pre-Annexation and Development Agreement states that “It is Stilo's responsibility to develop a water distribution system that will serve the Stilo Properties...Stilo will do so either through new wells or other sources”³. What other sources? And does this even include providing water to the Town parcel(s)?

Water depletion may sound far off, but please view the loss of our most accessible water sources as an imminent and dangerous reality. The reliance on expensive water brought from 2500 feet down, and trucked-in water as a backup, pose grave safety concerns. What happens if the people, or the town, cannot afford the energy to pump water (or, as is happening in Prescott Valley right now, a pump motor goes out)? What if the wells act to draw uranium-contaminated

¹ pp. 5-4 to 5-5 in Bureau of Reclamation. 2002. Grand Canyon National Park Water Supply Appraisal Study: Coconino, Mohave, and Yavapai Counties, Arizona. Prepared by Bureau of Reclamation Phoenix Area Office, Phoenix, Arizona and Technical Service Center, Denver, Colorado. 217 pp.

² *Ibid.*, Table 4.4, p. 4-43.

³ p. 10, Sec. 11 (a) in Pre-Annexation and Development Agreement Between the Town of Tusayan, an Arizona municipal corporation and Stilo Development Group USA, LP. July 2, 2011. 38 pp.

groundwater closer to the town? We know that high uranium concentrations have been recorded in the Canyon Mine Well⁴. The idea of relying on a new Colorado River pipeline is equally tenuous, considering Arizona's last-place right to Colorado River water during severe drought, and current proposals to build new pipelines in Utah and Colorado.

Beyond the water concern, please also consider the possibility that Kaibab National Forest could consider the proposed infrastructure through the forest: a paved road of at least two lanes or more, water main, electric and phone lines, sewer, and, potentially, internet and natural gas, as contributing to a cumulative impact that would irreparably damage Forest resources. What would happen then? Would Tusayan's housing needs take priority over tourism development? Or could the developer abandon the whole proposal, leaving the Town with nothing?

The Sierra Club is asking for strong, sound, tempered leadership that considers the future of Tusayan and the public lands that draw its residents and visitors. Great leaders in Arizona, on the verge of massive opportunities, have made regrettable and unchangeable decisions. Goldwater gave away Glen Canyon for the benefit of Phoenix's growth- and wept over that decision in the last years of his life. It brought too many to Phoenix, and destroyed the place he loved. Please take seriously the fact that your decisions can harm/destroy Grand Canyon springs and forests rich with wildlife. Do you want to be the ones responsible?

Please ensure that your actions today are above reproach and that there is no appearance of, or real conflict. Make it clear that you are acting in the best interest of the community, its residents, and all our public lands.

Thank you.

⁴ In water sources where high levels of uranium have been found, contaminant levels vary greatly over time. Uranium is highly soluble. Between 1987 and 1992, the Canyon Mine well registered uranium concentrations from 20 to 40 micrograms/liter. In 1989, it spiked above 300 micrograms/liter. The US EPA limit for uranium in drinking water is 30 micrograms/liter.

Source: Table 5, p. 160, and Figure 15, p. 186, *in:* US Geological Survey. 2010. Hydrological, geological, and biological site characterization of breccia pipe uranium deposits in Northern Arizona. USGS-SIR 2010-5025. Reston, VA. 354 pp.