



September 29, 2014

Mr. Terry Fulp
Lower Colorado Region Regional Director
Boulder City , NV
FAX: +1 (702) 293-8333

Dear Mr. Fulp,

RE: Request for Interested Party Status for any attempt to move water from the Colorado River and/or the Central Arizona Project to the Tusayan, Arizona area.

The Center for Biological Diversity (“Center”) is a non-profit, public interest, conservation organization with more than 675,000 members and online activists dedicated to the protection of endangered species and wild places.

A massive new development adjacent to the Grand Canyon National Park will overwhelm the already overburdened infrastructure of the Park. The Associated Press reports,

“...Visitation to the park has remained relatively flat at 4.5 million annually, but parking shuttles from Tusayan are routinely crowded, and the parks’ facilities are overwhelmed, park Superintendent Dave Uberuaga said...”¹

The developer, Stilo, owned by Italy’s Stilo Immobiliare Finanziaria, and represented in the United States by Mr. Thomas De Paolo, plans more than 3 million square feet of commercial space and up to approximately 2,200 new residential dwellings.²

Mr. De Paolo claims to have acquired water options for the massive new development from farmers in Nevada. The Los Angeles Times reports,

“...De Paolo said he has acquired water options from farmers along the Colorado River in Laughlin, Nev. From there, he said, a dormant coal slurry pipeline could be retrofitted to carry water to Tusayan...”³

¹ “Grand Canyon airport expansion planned,” Felicia Fonseca, Associated Press, November 1, 2011.

² <http://tusayan-az.gov/general-plan/>

³ “National Park Service calls development plans a threat to Grand Canyon,” Julie Cart, Los Angeles Times, July 7, 2014.

As you know, the Secretary of Interior, via the Bureau of Reclamation, must approve any transfer of water from the Colorado River, whether via “sever and transfer,” or via exchange of Central Arizona Project water. Since such an action will have a major devastating effect on the Grand Canyon and will be extremely controversial, National Environmental Policy Act evaluation must precede any such approve by any Interior agency.

Please include Dr. Robin Silver and the Center for Biological Diversity as interested parties in any Bureau of Reclamation and/or any Department of Interior action concerning movement of water to support any development in the Tusayan area.

Our contact information follows: Dr. Robin Silver, Center for Biological Diversity, PO Box 1178, Flagstaff, AZ 86002; phone, (602) 799-3275; or email me at rsilver@biologicaldiversity.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Robin Silver", with a stylized flourish at the end.

Robin Silver, M.D.
Co-Founder and Board Member

CC: Interior Secretary Sally Jewel; FAX: +1 (202) 208-6956
Bureau of Reclamation Commissioner Lowell Pimley; FAX: +1 (202) 513-0309