

October 7, 2015

Ms. Heather C. Provencio, Supervisor  
Kaibab National Forest  
800 South 6th Street  
Williams, AZ 86046  
Via Email: hcpovencio@fs.fed.us

**Re: Tusayan's Request for Special Use Permit to Facilitate Massive Development  
Should Be Rejected**

Dear Supervisor Provencio:

Welcome back to northern Arizona.

As Kaibab National Forest Supervisor, you have the honor of protecting a forest rich in cultural importance, biodiversity, and history, as you are tasked with overseeing public lands adjacent to the Grand Canyon. One of the most momentous and potentially damaging decisions you will have to make in the coming months will be whether to approve the Town of Tusayan's request for a special use permit that would pave the way for the construction of a huge and inappropriate commercial and residential development on the doorstep of Grand Canyon National Park.

Because of the threat the development poses to the water, wildlife, cultural, and other resources of Grand Canyon National Park, and to the tribes, other communities, and businesses of northern Arizona, the undersigned groups, businesses, and individuals strongly urge you to reject Stilo's permit.

The Forest Service can and should reject the application because it is not in the public interest. The purpose and effect of the easements Tusayan seeks is to facilitate Stilo Development Group's plans for a massive development just outside Grand Canyon National Park—a World Heritage Site—and one of the world's most recognized, iconic, awe-inspiring, and beloved landscapes. With the increased access and utilities sought in Tusayan's application, Stilo proposes to build nearly 2,200 new housing units and more than 120 acres of commercial development, which could amount to three million square feet of new commercial space. This development would hugely expand the commercial footprint of Tusayan (which is now less than 150 acres) and could increase the Town's population from a little over 500 to more than 5,000.

Such an enormous development threatens the water, wildlife, visitor experience, and infrastructure of Grand Canyon National Park, and the cultural and natural resources that are vital to the identity and survival of numerous American Indian tribes. It also threatens natural and recreational resources on the Kaibab National Forest itself. Of primary concern is the fact that in this arid environment, Stilo has no defined plan for providing water to the thousands of residents and visitors the development will bring to the area. Studies indicate that pumping groundwater for the development is almost certain to have a direct negative effect on spring flows in Grand Canyon National Park. Stilo's development will also dramatically alter the town of Tusayan, and may harm other businesses across northern Arizona.

The easements and development are opposed by the undersigned, other Flagstaff businesses, the National Park Service, tribes, and former Park Service employees. More than two hundred thousand members of the public wrote the Forest Service earlier this year opposing the project. This project thus does not serve the public interest, and the Forest Service can and should reject it.

The Forest Service has grounds to reject, or at least suspend, Tusayan's application until the Town has provided the agency with sufficient information to conduct an adequate analysis of the easements' impacts. As noted, Tusayan has failed to disclose the water source that will be required to maintain thousands of dwelling units and the potential millions of square feet of commercial space. Without these key data, the Forest Service may find it difficult to predict the magnitude of the development's threat to South Rim springs, the tribes, and Grand Canyon's wildlife.

If the Forest Service nonetheless decides to analyze the application under the National Environmental Policy Act (NEPA), the Forest Service must prepare a full EIS because the development will have significant impacts on Grand Canyon National Park and its water, wildlife, visitors, and infrastructure, as well as on the Kaibab National Forest and the surrounding environment. The Forest Service must disclose the development's full impacts because the easements' purpose and effect is to make that development possible. Disclosing the impacts of the development will serve to further underscore the need to reject this proposal.

Finally, while Stilo may argue that the Alaska National Interest Lands Conservation Act (ANILCA) *requires* the Forest Service to approve Tusayan's permit application, that assertion is false. The law requires the Forest Service to provide "adequate access" to inholdings, which Stilo and Tusayan already have via existing Forest Service roads. Further, any "access" ANILCA requires applies only to travel to and from the property, not to the many utilities (sewer, water, gas, cable, etc.) for which Tusayan has applied.

Thank you for your attention to this matter. We will be in touch with your office to arrange a meeting with you to discuss this further.

Sincerely,



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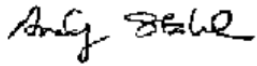
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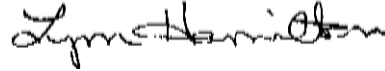
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