



December 21, 2017

Senator John McCain

FAX: (202) 228-2862

Attn: Doug Smith ([doug\\_smith@mccain.senate.gov](mailto:doug_smith@mccain.senate.gov)) and Nick Matiella  
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Senator Jeff Flake

FAX: (202) 228-0515

Attn: Chuck Podolak ([chuck\\_podolak@flake.senate.gov](mailto:chuck_podolak@flake.senate.gov))

Dear Senators McCain and Flake,

- RE: (1) Further development at Tusayan will harm Grand Canyon National Park.  
(2) Your attempted bullying of the Departments of Interior and Agriculture on behalf of Stilo Development Group to the detriment of Grand Canyon National Park is highly inappropriate.  
(3) Please retract your July 28, 2017, Stilo advocacy correspondence to the Departments of Interior and Agriculture.

Grand Canyon National Park is already overwhelmed with visitors and inadequate and antiquated infrastructure.<sup>1</sup> Stilo's development will exponentially increase the number of people living in and visiting the area. Water for the Stilo/Tusayan development will result in reduction of flows to Havasupai Falls and the springs and seeps of Grand Canyon National Park.<sup>2</sup>

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<sup>1</sup> NPS Deferred Maintenance by State and by Park FY14, Facility Management Software System, National Park Service, data as of September 30, 2014.; National Parks maintenance backlog: \$11.5 billion, Miranda Leo, Cronkite News, March 23, 2015.; "Grand Canyon sets annual visitation record," Felicia Fonseca, Associated Press/Arizona Daily Sun, December 29, 2017.

<sup>2</sup> Montgomery & Associates, Inc., 1998. Supplemental Assessment of the Hydrologic Conditions and Potential Effects of Proposed Ground Water Withdrawal, Coconino Plateau Groundwater Sub-Basin, Coconino County, Arizona. 85 p., in Appendix of the Final Environmental Impact Statement for Tusayan Growth, Kaibab National Forest.; Kessler, 2002. Grand Canyon Springs and the Redwall-Muav Aquifer: Comparison of Geologic Framework and Groundwater Flow Models, Northern Arizona, December 2002.; Bills, D.J., Flynn, M.E., and Monroe, S.A., 2007, Hydrogeology of the Coconino Plateau and adjacent areas, Coconino and Yavapai Counties, Arizona: U.S. Geological Survey Scientific Investigations Report 2005-5222, 101 p., 4 plates.; Grand Canyon National Park's Objection to Application for Certificate of Convenience and Necessity by Tusayan Ventures, L.L.C.; Docket No. W-20828A-11-0475, Grand Canyon National Park, August 21, 2012.

Stilo Development Group is a foreign developer attempting to build a 3 million square foot commercial mall and 2,100 residential units immediately adjacent to Grand Canyon National Park in Tusayan. Stilo's sprawling "mega complex," as Stilo themselves call it, would increase the population of the tiny town of Tusayan by 1,000 percent.

We have just recently become aware of your correspondence, dated July 28, 2017, to Agriculture Secretary Perdue and Interior Secretary Zinke requesting that they "...respond to the town's request to resume the processing of a 2014 application for a road easement" and "to reinstate good-faith discussions with the Town of Tusayan."

In "National Park Service calls development plans a threat to Grand Canyon," the Los Angeles Times reports,

"...a major housing and commercial development, jeopardizes the fragile ecology and water supply on the arid South Rim plateau. The Tusayan development would add 2,200 homes and 3 million square feet of commercial space to a town two blocks long.

Park officials say existing development around the park and the scarcity of water have already stressed the park's ability to handle visitors. The new projects would only make matters worse.

"They are serious threats to the future of the park," said park Supt. Dave Uberuaga. "When you have that size and scope of potential development that close to the park, it will impact our visitor experience."<sup>3</sup>

As you know, Stilo's development depends completely on an access/right of way easement from the U.S. Forest Service. The Forest Service has refused Stilo this easement recognizing that damaging Grand Canyon National Park and stealing water from the Park and the Havasupai are not in the public interest.

As you also know, on March 4, 2016, in rejecting Stilo's request for the access/right of way easement, the Forest Service stated,

"Based on information received in the record, I [the Kaibab National Forest Supervisor] have determined that the Tusayan proposal is deeply controversial, is opposed by local and national communities, would stress local and Park infrastructure, and have untold impacts to the surrounding Tribal and National Park lands... Given the information above, even if your proposal were to proceed through to second-level screening, based upon the record before me, I find that the proposal would be rejected as there is significant evidence the proposal is not in the public interest, 36 CFR251.54(e)(5Xii)."

Your correspondence, dated July 28, 2017, to Agriculture Secretary Perdue and Interior Secretary Zinke specifically states,

"Earlier this year we asked the U.S. Forest Service to respond to the town's request to resume the processing of a 2014 application for a road easement after the processing was abruptly halted despite the fact that the applicants had made a significant financial investment in the project...we ask you to direct the U.S. Forest

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<sup>3</sup> National Park Service calls development plans a threat to Grand Canyon, Julie Cart, Los Angeles Times, July 6, 2014, <http://www.latimes.com/nation/la-na-grand-canyon-20140706-story.html#page=1>.

Service and National Park Service to reinitiate good-faith discussions with the Town of Tusayan on moving forward with analyses of any future proposals to address housing, water, and telecommunications needs in and near the Grand Canyon National Park.”

Stilo refuses to recognize and admit that their development will hurt the Park. Why can't you?

Since when it is the motivation of Arizona's Senators to advocate for foreign developers simply because that have made “significant financial investment in the project”?

Stilo has made a bad investment. The Departments of Interior and Agriculture owe them nothing. Please retract your errant correspondence.

If you have further questions, please contact Robin Silver, M.D., Center for Biological Diversity, P.O. Box 1178, Flagstaff, AZ 86002, by mail; by phone: (602) 799-3275, or by Email: [rsilver@biologicaldiversity.org](mailto:rsilver@biologicaldiversity.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Robin Silver", written in a cursive style.

Robin Silver, M.D.  
Co-Founder and Board Member  
Center for Biological Diversity