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Dear Forest Service Representatives,

I am writing to urge you to decline the town of Tusayan's request for easements that would allow infrastructure needed for residential and commercial development of Forest Service inholdings near the town and near Grand Canyon National Park. I will be direct, these easements are necessary for Gruppo Stilo to move forward expeditiously with their development plans, and Tusayan is making the request on behalf of its financiers. Approving these easement requests would make the USFS complicit in these developments, and therefore responsible for all effects of the developments.

Let us be clear, this not a request from a free and open municipality. The town of Tusayan has been corrupted and its political process is beyond suspect. Its very creation is an end-run on the Arizona constitution financed and ramrodded by foreign investors who have stopped at nothing to subvert local political process. In considering this request, I ask the USFS to consider that the request does not originate from a bona fide entity or stakeholder. Please consider that the incorporation of Tusayan is suspect and the political processes of the ?town? make it clear that it does not function as a true democratic municipality, but rather as a puppet of foreign investors. Yes, it seems that foreign investors have created their own ?governmental entity? in the United States. Gruppo Stilo and Tusayan are in reality synonyms, and transparency would require that these request originated with Gruppo Stilo. Further, one of the easement requests is for a parcel that is not currently part of the incorporated town of Tusayan, and I ask that the USFS evaluate whether or not the town has the legal status to request an easement for a property that is not included in its current boundaries.

Although Gruppo Stilo has multiple proposals on the table for providing water to the developments these easements seek to support, the use of groundwater is most likely, and is still on the table. Thus, these easement requests must be considered under the ?worst case? (most likely) assumption that groundwater use will increase. Recent studies indicate that groundwater depletion in and around Grand Canyon is resulting in reduced and extinguished flow at seeps and springs. As Vasey's Paradise slows to a trickle, we continue to fiddle with proposals that will lead to sucking up yet more life-giving groundwater? These springs are essential not only to wildlife in the area, but also to the use of GCNP by outdoor enthusiasts. For example, the Tonto Trail from South Bass to Hermit's Rest can only be traversed because of ephemeral springs and seeps along the route. Depletion of groundwater in this area is likely to dry up these, and other, water sources along the Tonto Trail, rendering vast swathes of the Canyon unusable by backpackers and other recreationists. Loss of these springs is also a threat to the safety of backpackers and recreationists who have come to rely on these historically safe permanent sources in an extremely arid environment. A variety of wildlife, including endemic species, will also be affected by groundwater depletion associated with granting these easements to the town of Tusayan. The USFWS has been petitioned to list at least 2 of these species as endangered under the ESA. I urge you to fully investigate the probability that this easement will result in groundwater depletion that will affect these species and recreationists. Please use, and defer to, peer-reviewed science whenever possible.

I urge you to also assiduously explore and consider the local economic implications of granting this easement, which opens the door to development. These easements will allow development that will result in clearly foreseeable local economic strains. These easements will increase the burden on GCNP infrastructure, which is currently underfunded and incapable of supporting increased strain without severe ecological and economic

impacts to adjacent National Park and National Forest lands. Further, these easements will direct important and historic tourism revenue away from the towns of Flagstaff and Williams, Arizona (and to a lesser degree, Kanab, UT) to Tusayan, Arizona. Flagstaff and Williams have evolved slowly with increases in tourism to Grand Canyon and are uniquely suited to serving Grand Canyon National Park tourism. These easements will likely depress job opportunities in the county as a whole, albeit increasing jobs on the doorstep of the national park. The infrastructure of Tusayan will be impacted, increasing local traffic, strain on local public resources, etc.

Granting these easements will also create increased demand for air tourism over Grand Canyon National Park. While air tourism is managed by other agencies, granting these easements will shift the balance of power and will increase political pressure in favor of increased air tourism allotments (or reduced regulation of air tourism), and this factor must be considered when considering the request for these easements. Air tourism is an almost exclusively Tusayan-based industry, it is owned by one of the proponents and financiers of this easement request, and it would be naive at best, to suppose that increased development of Tusayan will have no effect on this industry and the effects of air tourism on the public's ability to enjoy Grand Canyon National Park from the ground.

This requested easement will inevitably increase light pollution in one of the darkest corners of our state. Currently, Tusayan is visible from many points on the north rim of Grand Canyon as a relatively small arc of light on the southern horizon. That arc will grow if you grant these easements. The ability to see the night stars will be hindered for miles around the Tusayan, including just 6 miles away in the south rim visitor area, where the park receives most of its visitors.

I am one of 3 people who have hiked the length of Grand Canyon (from Lee's Ferry to Pearce Ferry) below the rim on both sides of the river. My perspective on Grand Canyon is therefore unique, and has changed dramatically over the course of my explorations. It is a place that affords citizens the opportunity to, briefly, experience true wilderness. OUR wilderness. Grand Canyon is unique among most of our National Parks in the "lower 48" because so much of it is difficult to access. It is dark at night. Much of it is quiet. Grand Canyon is at once, fragile and foreboding. There are SO FEW places like it left. PLEASE, do not sacrifice yet another slice of our wilderness to development. Although there is no federal act to protect it, wilderness itself is endangered, and wilderness is finite. Soon, we will have nothing left to compromise away with developers. The time has come to say NO to development that squanders this irreplaceable national treasure for the pecuniary interests of the very, very few. To be plain, granting this easement will sell wilderness that belongs to the citizenry of the US to a few foreigners.

These easements will change the character of this National Park, and the town of Tusayan for the worst. These easements will move Grand Canyon incrementally closer to an Amusement Park, instead of helping to retain it as one of the last treasured wilderness areas in the continental U.S.

I strongly encourage you to act in the interests of the vast majority of the people of the United States by preserving this wilderness for future generations and for the wildlife that lives here. Reject this request for an easement that serves only the investors who created the "town" of Tusayan.

Listen to the lessons of history. Listen to the wisdom of the man who established Grand Canyon as a National Monument on January 11, 1908.

Sincerely,

Andrew T. Holycross, Ph.D.
Biologist and Backpacker

