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Nicholas Larson, District Ranger
Tusayan Ranger District
Kaibab National Forest
P.O. Box 3088
Grand Canyon, AZ 86023-3088

Sent via: USPS and email to nicholaslarson@fs.fed.us

Re: Proposed developments by the Stilo Group in Tusayan Ranger District

Dear District Ranger Larson:

I represent the Havasupai Tribe and these comments are submitted on their behalf and at the request of the Havasupai Tribal Council.

The Stilo Group owns several "inholdings" within the Tusayan Ranger District on which they plan to develop single-family residential housing, multi-family housing, camping and recreational vehicle facilities, resort and conference facilities and other tourist and community amenities. Stilo Group includes the same people who proposed Canyon Forest Village in the late 1990's. CFV was proposed to be built on Forest Service land along Highway 64 that would have been exchanged for these same inholdings.

Stilo Group recently submitted applications to your office for greatly expanded road access and utility corridors to the Ten X and Kotzin inholdings. It is reasonable to assume at this point in the process that the developments on the Ten X and Kotzin inholdings will be similar to those described in the Development Agreement between the Stilo Group and the Town of Tusayan. The potential for impact to forest resources and to the resources of importance to the Havasupai is greater from the current plan to develop inholdings than the impacts would have been from Canyon Forest Village. Therefore, the Forest Service is required to conduct no less comprehensive environmental review and compliance than it did for the Tusayan Growth EIS. The Havasupai Tribe requests that the Forest Service prepare an Environmental Impact Statement that includes examination of the impacts from the proposed development to Havasupai water resources and to the cultural resources in the area of their aboriginal territory.

Granting access for visitors and utilities is a major federal action

The facts of this situation make approval of expanded rights-of-way and a utility corridor major federal actions that have the potential to significantly affect the environment. Development as outlined in the Development Agreement cannot occur without the requested utility corridor and expanded road access. This creates a causal relationship between the Forest Service action and the proposed development requiring an examination of all environmental impacts. The Forest Service, in essence, opens the door to residential housing, increased traffic and greatly increased tourism in the heart of the forest with the potential for significant impacts on forest resources, the resources of the adjacent Grand Canyon National Park and other resources of importance to the Havasupai.

Need for an EIS

The purpose of preparing an EIS is to inform the decision maker *and* to inform the public that the environment has been given due consideration.

The Development Agreement calls for a significant change in use for the private inholdings creating impacts that have not yet been studied. The following includes the range of development options for the Ten X and Kotzin parcels:

Ten X	Single family houses	310 – 456 units
	Multi-family residential units	262 – 410 units
	Acres for resort and conference facilities	35 acres without limit as to rooms or square footage
Ten X Alternative Plan	Single family houses	370 – 534 units
	Multi-family residential units	262 – 455 units
	Acres for resort and conference facilities	35 acres without limit as to rooms or square footage
	Acres for seasonal recreational vehicle park	22 acres without limit as to number of spaces

Kotzin	Single family houses	25 units
	Multi-family residential units	237 - 745

	Acres for commercial and lodging	41 acres without limit as to rooms or square footage
	Acres for resort conference district	10 acres without limit as to rooms or square footage
Kotzin Alternative Plan	Multi-family residential units	474 – 1320 units
	Acres for commercial and lodging	41 acres without limit as to rooms or square footage
	Acres for resort conference district	10 acres without limit as to rooms or square footage

The Kaibab National Forest Management Plan does not address proposed large-scale development on inholdings. The 15 year-old Tusayan Growth EIS discusses the possibility of development on the private inholdings but fact specific information was not available to examine potential impacts.

The potential impact on forest resources and the public health and safety of the people accessing and using the resources must be evaluated. For example; what is the increased danger of wildfire from large-scale development in the forest? What is the potential impact on wildlife management and hunting in the forest? What is the impact on the cultural resources; not just to those located on the private inholdings but to those on the surrounding public lands with the increased visitation this development will bring.

The Tusayan Ranger District is a unique environment in part because of the close proximity and shared boundary with Grand Canyon National Park. Development of this land is likely to be highly controversial. The Tusayan Growth EIS generated thousands of comments from the public, was circulated among hundreds of federal, state, tribal and local entities and the Coconino County zoning decision permitting Canyon Forest Village was overturned in a countywide referendum. It can be anticipated that the proposed Stilo Group development will be similarly controversial.

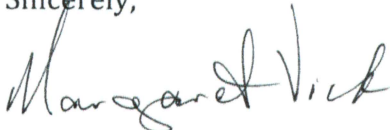
In addition to the Ten X and Kotzin parcels, the Stilo Group or its affiliates own additional private inholdings within the Tusayan Ranger district. An EIS is the start of the process to consider the cumulative impact of development on each of these parcels. Is the Tusayan Ranger District to become the open-space-backyard for thousands of residents and resort visitors within its boundaries?

Potential impact to water and spring resources

Stilo Development has not yet identified a water supply for the proposed developments on Ten X and Kotzin. The Forest Service approved an alternative for the Canyon Forest Village development that did not impact the springs and seeps to which the Havasupai have rights and religious connections. The Forest Service owes the Tribe a trust responsibility to examine alternatives that provide this same level of protection.

Thank you for your consideration of these comments. The Havasupai Tribal Council and I look forward to working with you, the Tusayan Ranger District and the Kaibab National Forest on the preparation of the EIS for the Stilo Group development proposals.

Sincerely,



Margaret J. Vick, JSD

Cc:

Don Watahomigie, Chairman
Havasupai Tribe

Matthew Putesoy, Vice Chairman
Havasupai Tribe

Havasupai Tribal Council Members

Richard W. Hughes, Special Counsel
Havasupai Tribe

Michael Williams, Forest Supervisor
Kaibab National Forest

Steve Hattenbach
USDA, OGC

David Uberuaga, Superintendent
Grand Canyon National Park

Tom DePaolo
Stilo Group