



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, D.C. 20240

**MAY 11 2015**

Mr. Robert Bonnie  
Undersecretary for Natural Resources and Environment  
Department of Agriculture  
1400 Independence Avenue, SW  
Washington, DC 20250

Dear Mr. Bonnie:

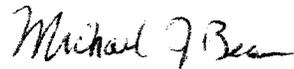
Under the terms of the National Historic Preservation Act, the Secretary of the Interior is charged with coordinating U.S. participation in the World Heritage Convention, and that responsibility has been delegated to my office. The United States has successfully nominated 22 sites to the World Heritage List including Grand Canyon National Park which was inscribed in 1979. In nominating these U.S. sites, the U.S. government pledged to the international community to protect them in perpetuity. While the overall direction and coordination of U.S. participation in the Convention is assigned by law to the Secretary of the Interior, the commitments made by the United States in signing the treaty are the responsibility of the entire Federal government and thus every Federal agency.

On behalf of the Department of the Interior and the National Park Service, I would like to urge that this responsibility be considered by the U.S. Forest Service in its evaluation of the request for a Special Use Authorization sought by the town of Tusayan from the Kaibab National Forest for rights-of-way to permit large-scale residential and commercial development on an inholding within the National Forest in close proximity to Grand Canyon National Park. Specifically we believe that the Forest Service's environmental analysis should consider impacts, including cumulative impacts, beyond the immediate footprint of the rights-of-way. If granted, the Special Use Authorization will facilitate development which could result in a variety of negative impacts to the Park and, importantly, to its "Outstanding Universal Value" (OUV), i.e., what makes the Park significant at a global level. In particular, if the development taps into groundwater sources it could present irretrievable loss in water resources and attendant biota associated with seeps and springs in the Park. It is our understanding that, to date, neither the town of Tusayan nor the developer has identified a source of water for the development. Until a water source has been identified, it may be premature to begin an environmental analysis.

In the last few months, we have received inquiries from the World Heritage Centre, the Secretariat of the World Heritage Committee, which administers the World Heritage Convention, on this matter. The Committee requested that potential impacts to the Outstanding Universal Value of Grand Canyon National Park be specifically considered in any environmental review pertaining to the Tusayan development. The Department agrees that considering impacts to OUV should be an explicit part of any environmental analysis and that doing so is in keeping with U.S. commitments under the Convention. We would be pleased to work with the Forest Service to provide information on the OUV of the site to help give a clear understanding of why the Park has been recognized internationally and what values we are committed to preserving.

Thank you for your consideration of this matter.

Sincerely,



Michael J. Bean  
Principal Deputy Assistant Secretary  
for Fish and Wildlife and Parks

cc: Dave Uberuaga, Superintendent, Grand Canyon National Park  
Sue Masica, Regional Director, Intermountain Region