

Response to Comments

Ten X Campground Expansion Project

Tusayan Ranger District

Kaibab National Forest

This document contains the comments, questions, or concerns received on the draft Environmental Assessment (EA) for the Ten X Campground Expansion Project, and the Forest Service responses to these comments, questions, or concerns. Comments were considered substantive if they provided information to modify alternatives, evaluate new alternatives, improve or modify the analysis, or make clarifications or corrections. The designated 30-day notice and comment period for the draft EA was initiated with a legal notice published in the *Arizona Daily Sun* on May 1, 2019. During this comment period, the Kaibab National Forest (NF) received a total of 11 comment letters; 9 comments within the legal comment period, 1 comment outside the scope of the project, and 2 comments received outside the legal comment period. The comments received did not constitute a change in the analysis, however, there was a need for clarification around the topic of water. This clarification can be found in the EA on page 5 under the heading *Clarification Between Draft and Final Environmental Assessment*. Each unique comment letter was numbered; Table 1 provides a crosswalk between the comment letter number and the identity of the commenter. Comments within each letter were then given a tracking number. For example, comment 2-1 describes comment number 1 within comment letter number 2. Concern statements are intended to capture the thought, idea, or issue of the comment common to all of the associated comments. While this document provides text of comments received, the full comment letters provide additional background and may cite literature for context for the comments.

Table 1. Crosswalk between comment letter numbers, commenters identity, and project record descriptions

Comment Letter Number	Commenter	Project Record Description
1	Rob Jones	20190505Comx1JonesR1x
2	Jo Wichmann	20190509Comx1WichmannJ1x
3	Kevin Eshelman	20190501Comx1EshelmanK1x
4	Zack Summit	20190503Comx1SummitZ1x
5	Steve Gaseau	20190503Comx1GaseauS1x
6	Town of Tusayan	20190530Comx1SandersonC1xTus
7	Joel Brown	20190530Comx1BrownJ1x
8	Caitlin Johnston	20190530Comx1JohnstonC1x
9	Clarinda and John Vail	20180601Comx1VailC1x
10	Margaret Foster*	20190528Comx1FosterM1x
11	Grand Canyon National Park	20190605Comx1BalsomJ1xGCNP

*Outside the scope of the project.

Comment Letter 1 (Rob Jones)

Comment 1-1: I support the expansion of this campground - for campers. Not for RVers, which is NOT camping. RVs destroy the natural quiet (generators, water and other pumps, furnace fans, etc.) and the dark sky (porch lights, rope lights, TVs in lower storage units, etc.). They are accelerating the negative effects of climate change... The ways RVs do not represent "camping" are infinite. No space, none at all, should be made for these climate change accelerating behemoths in the Ten X... The ways RVs do not represent "camping" are infinite. No space, none at all, should be made for these climate change

accelerating behemoths in the Ten X. None. I hope this is clearly stated. All trailers (small I hope) and other RV-type units should be sequestered somewhere in Tusayan, not in our public forests. All RVs need is a level place, and the chambers of commerce can more easily build new parking lots.

Response: National Forest System lands are available to diverse types of recreation. It is an important mission of the Forest Service to provide recreation opportunities free from discrimination. Concentration of RV camping to a campground reduces the amount of resource damage found from dispersed tent and RV camping within the Forest. RVs' are a common and popular use of our public lands and the Forest Service will continue to support this use. Climate change is outside the scope of this project. No further response is needed.

Comment 1-2: My preference and my request is that the Ten X be a tent only facility which prohibits the use of generators or noise makers of any kind. Quiet hours do not work. The only reasonable and effective solution is to ban all generators and pumps and fans and noise-makers 24-hours per day...

Response: The purpose of this project is to provide front country recreation opportunities for the public by increasing the campsites and amenities available at Ten X campground. This includes RV Camping and the associated equipment with that type of camping. Ten X campground currently has quiet hours (10:00 p.m. to 6:00 a.m.), and those will remain in effect during the expansion. Imposing a 24-hour ban on noise is outside the scope of the project.

Comment 1-4: I also recommend that the Ten X expansion be designed like an old FS campground, with lots of space between units to allow camping to occur. The new loops and sites should be designed for use by cars and pickups, not large vehicles. Designing for campers and not for RVs will allow more space between sites while staying within the footprint envisioned by the USFS.

Response: It is the intent of the Kaibab National Forest that Ten X campground will remain a development scale three campground which means it will be a recreation opportunity spectrum (ROS) of roaded natural. This ROS class is a predominantly natural appearing environment with moderate evidence of the sights and sounds of other humans. Interaction between users may be low to moderate, but the evidence of other users is prevalent. New construction will be designed to maintain the current natural character with well-spaced campsites. See response to comment 1-1 for information on RV camping.

Comment Letter 2 (Jo Wichmann)

Comment 2-1: In much of the information that you have provided you refer to the campground sites as "small" and not large enough for big rig rv's. I can tell you that these sites are some of the largest around. We see sites and have stayed in sites at 10-X that can accommodate 2 or MORE 35'+rigs in ONE SITE. You also have referenced that RV's have had to go the wrong way on the entrance roads in order to "fit". Rv-ers go in backwards not because they don't fit but because they want to open up to the forest rather than the road. It's all about the "experience" of camping where you can wake up to see trees and wildlife and have room to breathe without another camper right next to you like Mather and many other campgrounds.

Response: While there are a small number of sites that can accommodate larger RVs' currently in Ten X campground, the number of sites available to accommodate large RVs' is inadequate to meet the demand. Additionally, RV capacity is limited not only by campsite design, but how narrow the road is and how tight the turns are. It is the intent of the Kaibab National Forest that Ten X campground will remain a development scale three campground (see response to comment 1-4 for more information). New construction will be designed to maintain the current natural character with well-spaced campsites

Comment 2-2: With respect to the water issue which I have raised previously, I know that at one point the town of Tusayan was not able to expand because the lack of water was an issue. Again, even if you truck it in from a private source it seems wasteful to use it for the campground. If existing running water

spigots is a concern as you mentioned and your solution is to build a water station, then just build the water station for the existing sites and remove the spigots.

Response: Potable water is a necessary amenity to provide at Ten X campground because many visitors are inexperienced campers and are not prepared to provide water for themselves. All water at Ten X campground would be used as drinking water only; no showers or flush toilets would be provided. To limit the amount of water waste at the campgrounds, the Kaibab National Forest is proposing to decommission the old water infrastructure and install a water station in one common area instead of all loops. These new spigots will include conservation measures such as auto-shut off valves. This would limit the amount of people that are doing dishes, bathing, and leaving the faucets running. The new spigots will have auto-shut off valves and other water conservation measures associated with them.

Comment 2-3: I am opposed to the expansion of the 10-X campground as it is proposed. If an expansion is deemed truly necessary then please limit the number of new sites to fewer than an additional 70 sites.

Response: The purpose of this project is to provide front country recreation opportunities for the public by increasing the campsites and amenities available at Ten X campground. The proposed number of sites was determined based on current demands at the campground, current levels of dispersed camping, as well as predicted future demand. There is an increase in visitation to the Grand Canyon National Park, which has limited camping opportunities. By increasing Ten X campground to about 300 sites, we would be limiting the amount of resource damage within National Forest System lands from the overflow campers from the Park.

Comment Letter 3 (Kevin Eshelman)

Comment 3-1: I'd more like to see a dedicated pull through driveway for a campsite off the main road.

Response: This concern is one of the reasons the Kaibab National Forest is expanding the campground; this is addressed in the analysis and design for Ten X campground. No further response is needed.

Comment 3-2: My only other concern would be the fact drinking water has to be trucked in a number of miles. What would any expansion do for the water situation?

Response: See response to comment 2-2 within this document.

Comment 3-3: With future expansion, at least part of the CG should be on the NRRS/US.gov reservation system. Both US.Gov and Reserve America are excellent resources to research the CG's. Possibly, a part of the expanded CG could be left to first come, first served.

Response: This is already in effect and would continue to be in effect with the expansion of the campground. Currently about half of the campground sites are able to be reserved and half are walk-in. No further response is needed.

Comment 3-4: Some expanded nature trails would be nice. Maybe even a paved trail connecting with GC park.

Response: The addition of nature trails is already a part of the project. This can be found in the EA on page 7, "*The Ten X Campground Expansion project would include new nature and interpretive trails, a trail connecting to the Arizona National Scenic Trail (AZNST), and would have the potential to connect with the proposed Town of Tusayan trail system.*" Having a paved trail connecting the Grand Canyon National Park to Ten X campground is outside the scope of the project. No further response is needed.

Comment Letter 4 (Zack Summit)

Comment 4-1: The Wildland Trekking Company, a CUA holder in Grand Canyon National Park, is **in favor of the proposed expansion** of Ten X Campground.

The National Forest, particularly around FR 302, has seen dramatically increased use and impacts over the last several years from dispersed camping and RV's in particular. While these areas should be left open to dispersed camping, additional sites at Ten X would reduce the amount of human waste, trash, and illegal fire rings that are accumulating in the National Forest around Tusayan.

Small dispersed pull-offs off of FR 302 are not well-suited to accommodate large RV's and these vehicles should have a more appropriate destination at an established campground.

Response: Thank you for your comment and your support of the Ten X Campground Expansion Project. The comment also reiterates the beneficial effects of the project. No further response is needed.

Comment Letter 5 (Steve Gaseau)

Comment 5-1: Build it. Make it nice!

Response: Thank you for your comment and your support of the Ten X Campground Expansion Project.

Comment Letter 6 (Town of Tusayan)

Comment 6-1: The Town of Tusayan wholeheartedly supports the proposed Ten X Campground Expansion...

Response: Thank you for your comment and your support of the Ten X Campground Expansion Project.

Comment Letter 7 (Joel Brown)

Comment 7-1: I oppose the size and scope of the proposed campground expansion. Going from 70 sites to 300 is way too many. I believe your current analysis underestimates the human impact on the environment. The proposed expansion will create a negative impact on the surrounding land and resources. RV camping, in particular, should not be expanded in any way. This area should not allow larger RVs.

Response: This expansion is an effort to limit the negative impacts to the environment from dispersed camping. Dispersed camping is a greater impact to the environment as it is less controlled than a developed campground. Developed campgrounds have hardened surfaces and are designed for more intense use. The purpose of and need for this project is *"The purpose of this project is to provide front country recreation opportunities for the public by increasing the campsites and amenities available at Ten X campground (Ten X). There is increased demand for sustainable recreation opportunities on the Tusayan Ranger District of the Kaibab NF due to increased visitors at the GCNP. The Ten X Campground Expansion project would reduce resource damage associated with the increase in dispersed camping, while also reducing the risk of human-caused wildfire."* In regards to RV camping, see responses to comments 1-1, 1-2, and 2-1. No further response is needed.

Comment 7-2: I oppose the proposed Ten X campground expansion. This area is in a sensitive flood plain. 300 campsites in this area is too many. If the area floods, it would be too difficult to safely evacuate that many people. Also, the human impacts to the land are vastly underestimated. This project should not be approved.

Response: Flood zones are geographic areas defined by the Federal Emergency Management Agency (FEMA) according to varying levels of flood risk. These zones are depicted on a community's Flood

Insurance Rate Map (FIRM) or Flood Hazard Boundary Map. Each flood zone reflects the severity or type of flooding in the area. Across the project area flood zone “X” occurs. This flood zone is defined as areas of minimal flood hazard and low risk (Kiesow, 2019). More information is available upon request at the Williams Ranger District Office.

Comment Letter 8 (Caitlin Johnston)

Comment 8-1: I oppose the size and scope of the proposed campground expansion. Going from 70 sites to 300 is too big of a increase. I believe your current analysis underestimates the human impact on the environment. The proposed expansion will create a negative impact on the surrounding land and resources. I have been to Havasupai Falls and it is a beautiful place that needs to be preserved. People from all over the world come to witness the Grand Canyon. It is our job to make the responsible decision. RV camping, in particular, should not be expanded in any way. This area should not allow larger RVs.

Response: See responses for comments 1-1, 1-2, 2-1, and 7-1 within this document. No further response is needed.

Comment Letter 9 (Clarinda and John Vail)

Comment 9-1: Regarding the Tusayan Campground Expansion Project. We do know we are just past the deadline. Still felt it important to send this letter in complete support of this expansion project. We think it is years past due to add on to this wonderful campground and perhaps prevent some campers spread into the less developed areas of the nearby forest.

Response: Thank you for your comment and support for the Ten X Campground Expansion Project.

Comment Letter 10 (Margaret Foster)

Comment 10-1: To the Town of Tusayan, In a time of increased division in our country and world, natural beauty is uniquely unifying. It is essential to protect the Grand Canyon as a symbol of American pride and unity. Accordingly, I ask that you please consider halting Ten X and deny The Stilo Development Group from building near the canyon. If the Ten X project continues to go through with the plans, then the Grand Canyon is at great risk. The only water source available is ground water which pumps water to important springs in the Grand Canyon. More ground water pumping would result in many of the springs being destroyed. This development project will also increase road, air, noise and light pollution around the Canyon... Yet it would inevitably erode the site's beauty, and endanger the human lives and communities that rely on it. I beg you to rethink this project.

Response: Due to this project being a National Forest project and not a Town of Tusayan project, this comment is outside the scope of the project. An email was sent to the commenter for clarification. No further response is needed.

Comment Letter 11 (Grand Canyon National Park)

Comment 11-1: Water: GRCA currently supports KNF water use, at both the administrative site and the campground. As we all know water in our region is limited, and the on-going issues with water delivery and reliability of this scarce resource continues to be a concern for GRCA managers. We suggest, in addition to referencing upgrading of water pipelines in the campground and maintaining health and safety standards, the EA and plan include specific direction related to water conservation measures and a commitment to maintaining water use at current or reduced levels into the future. Conservation measures such as water harvesting, pay station for water, or water recycling features are just a few ideas KNF could consider. Unless the KNF has identified another source of water, we believe the campground will continue to be reliant on GRCA water deliveries, a situation that may not be sustainable in the future. Our

goal is to work collaboratively with KNF to address this issue, and it is important, in this planning effort, to be realistic about expectations for water delivery into the future. Our staff experts, working with your staff, should develop a water supply estimate and program for the future.

Response: Clarification regarding water was added to the EA on page 5. Water conservation measures will be determined during implementation using adaptive management. The topic of water was also addressed in the *Response to Comments* documents for both the scoping and comment periods. Please see responses to comments 2-2 and 3-2 within this document. No further response is needed.

Comment 11-2: Transportation: We discussed several items related to transportation on April 24 that are not reflected in the EA. It would be great to see this plan tie into the Town of Tusayan trails plan and the Tusayan Multi-Modal Transportation Initiative. Both attempt to bridge the gap for recreational users and visitors who recreate both inside and outside the park boundary, often using Tusayan or Ten X as their home base. We are supportive of encouraging visitors to bike into the Park, a recreational opportunity supported by the KNF and the Town, and suggest including operational flexibility in the design plan to include bike friendly services (whether it be dedicated bike paths, connections to forest roads or the greenway trails, Arizona Trail, or bike rental facilities).

Response: This was addressed in the EA on page 7 “*The Ten X Campground Expansion project would include new nature and interpretive trails, a trail connecting to the Arizona National Scenic Trail (AZNST), and would have the potential to connect with the proposed Town of Tusayan trail system. By connecting these trails and adding interpretive trails, the Kaibab NF would be increasing recreation and educational opportunities for hikers, mountain bikers, campers, and the public.*” No further response is needed.

Comment 11-3: Shuttle Bus: In addition to the general discussion of transportation, we suggest including the possibility of hosting a park shuttle bus stop, and turnaround as part of the Ten X expansion project. As we discussed in our April 24th meeting, campers from Ten X could keep their vehicles at the campground if/when the park extends shuttle bus service to Ten X. GRCA already provides service to Tusayan, and extending to Ten X is a consideration that would benefit the variety of park and forest users should it prove economically viable.

Response: This is included in the multi-service central location for the campground. Exact design details will be developed during implementation through adaptive management. No further response is needed.

Comment 11-4: Education/Interpretation: We believe the project has the potential to allow greater outreach to our collective visitor base through increased education and interpretation at the site. A shared interpretive center, virtual or actual, could be a piece of the expanded campground, allowing both KNF and GRCA staff to provide enhanced interpretive and educational materials. We suggest including a statement that proposes improving outreach and education at the campground through partnerships. While this is not necessarily a physical improvement, space to allow it to happen could be identified in the common areas of the plan.

Response: This is addressed in the EA on page 7 “*With the expansion, there is a possibility to have an interagency visitor center to provide area information as well as the history of the Forest Service, Park Service, and surrounding tribes.*” No further response is needed.

Comment 11-5: Seasonality: The importance of Ten X, as a recreational site, cannot be understated. As GRCA visitation topped 6.3 million in 2018, we believe, in addition to an expanded campground, the project allow for an expanded season. We did not see a discussion of expanding the season and suggest an affirmative statement related to seasonality of use be included.

Response: This comment is outside the scope of the project. No further response is needed.