

To: Sandy Watts and/ or Acting Regional Forester, Southwestern Region, 333 Broadway SE, Albuquerque, NM 87102

From: Verde Valley NO BUILD Alliance (VVNBA), verdeDISconnect, Todd and Diane Scantlebury, Denise Gould, Hilary Barnett, Gail and Milton Pate, and Shannon and Zachary Wolfe. Lead Objector: Todd Scantlebury, [REDACTED]
[REDACTED]

Subject: Objection to Draft Forest Plan amendment proposed for 2018 Coconino Forest Plan to Accommodate Federal No.: YYV-0(209)Z, Yavapai County No.: 1722601 (Verde Connect)

Thank you for this opportunity to comment on and object to the proposed Forest Plan amendment. We have attached three documents: 1) our Dec 7, 2019 request to withdraw the original BUILD grant submitted by Yavapai County and awarded by FHWA, 2) our DEA Comments filed on May 22, 2020, and 3) our Commentary published in the Verde Valley Independent/ Camp Verde Bugle on Aug 15, 2020.

For the past two-years we have opposed and worked to stop the “Expensive Road to Nowhere” (Verde Connect). In brief, our request to withdraw the seed money (BUILD) grant argued that it was supported by inaccurate, outdated and misleading information and that it would NOT achieve stated goals of connecting the “divided” Yavapai-Apache, helping the “economically underprivileged” residents of Middle Verde or positively impacting the region. Our DEA comments argue that the project requires a full Environmental Impact Statement (rather than the abbreviated EA/ FONSI), because DEA impacts were inadequately considered or not considered at all, particularly impacts to the National Forest and human (Middle Verde) environments. The Commentary is a background/ history of opposition to the project, including ongoing political efforts to stop the project, as new Yavapai County officials are elected into office this year.

While the National Forest’s “hands might be tied,” given its relationship with and obligations to FHWA, we request that the above documents be reconsidered by the National Forest, in full. Allowing a 4-lane bridge over one of the last, undammed rivers in Arizona and a paved 2-lane road through 248 acres (4.1 Prescott and 244 Coconino) of National Forest right-of-way profoundly alters the existing character and future uses of the area. We object to the proposed Forest Plan amendment because it would:

1. Allow a road connection through Coconino NF to Middle Verde Rd that would adversely affect and endanger Middle Verde residents (see pages 4 & 5 of our DEA Comments)
2. Adversely affect endangered and threatened species and their critical habitat (see page 8 of our DEA Comments)
3. Produce controversial, unknown or uncertain impacts (see pages 9-11 of our DEA Comments)
4. Impact unique characteristics of the area and its lands (see pages 11-13 of our DEA Comments)
5. Produce cumulatively significant impacts (see pages 13-14 of our DEA Comments)
6. Threaten violation of Federal laws (see pages 14-15 of our DEA Comments)
7. Adversely affect significant cultural and historical resources (see page 15 of our DEA Comments)
8. Inadequately discusses mitigation measures (see pages 18-19 of our DEA Comments)

The Draft Forest Plan Amendment for the Verde Connect Project proposes to amend the forest plan to accommodate the proposed roadway as described in the Verde Connect EA. This includes changes to desired forest management direction for visual resources and stream ecosystems in the Verde Connect Project Area (FW-Scenic-G1 and FW-Rip-Strm-G-1).

The VVNBA letter dated May 22, 2020 provided comments and expressed concern about disturbance within the 100-year floodplain of the Verde River and about how construction of the Build Alternative would result in temporary and permanent impacts of wetlands and other Waters within the study area (p. 11):

Wetlands and Waters of the United States: The Project Area also includes Waters of the United States and wetlands. "The Waters present within the Study Area include 63 unnamed, ephemeral channels; OK Ditch, a manmade irrigation canal; the Verde River; one unnamed perennial drainage; and wetlands." DEA at 119. Four acres of disturbance area will occur in the 100-year floodplain of the Verde River under the Build Alternative." DEA at 118. Indeed, "[c]onstruction of the Build Alternative would result in temporary and permanent impacts of wetlands and other Waters within the study area." DEA at 121.

In the same letter, VVNBA also commented on and expressed concern about lack of analyses (and subsequent impacts) regarding cumulatively significant impacts resulting from increased development, road improvements, increased recreation, and future maintenance of the bridge (p. 13 and 14):

Cumulative effects analyses were silent on activities and uses mentioned (or not mentioned) in the DEA and other associated documents including: *The sale of ASLD land would likely result in the conversion of land that is currently used as range land to a developed

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use, such as commercial or residential (*see*, DEA at 154); *Road improvements to accommodate 4 lanes of traffic will occur in the future (*see*, Biological Opinion at 7); *Increased recreation and trash disposition, habitat fragmentation, fire risk, contamination of surface and groundwater (*see*, Biological Opinion at 37); *Increased urbanization and development may increase use of surface and groundwater in the Verde River drainage and could ultimately reduce flows in the Verde River resulting in significant long term threats to listed species in the action are over the long-term (*see* Biological Opinion at 30, 37); *Future management of the Verde Connect bridge would likely require vegetation removal or modification and possible removal of debris around piers and abutments (*see* Biological Opinion at 37); *Black Canyon Trail and connector (*see* DEA at 63; Increased traffic along the Middle Verde Road and the new road that could increase wildlife-vehicle collisions (Biological Evaluation at 39).

In addition, the Final Environmental Assessment (July 2020) states on p. 58:

Potential indirect impacts include an increase in human activity as tourists and outdoor enthusiasts are likely to be attracted to this stretch of the river once the road has been constructed. Although parking areas near the river corridor ~~would~~ **will** not be provided as part of the project, visitors may stop their vehicles nearby and walk down to the river to partake in recreational activities. *However, the road and bridge will be fenced to exclude this activity. Further, access will require a lengthy walk and the crossing of private property. Given there are numerous other river access points, this impact will be minor.*

We disagree with the statement that the impact of increased river access will be minor or that the fencing will be a sufficient deterrent. In fact, there are numerous nearby locations that access perennial streams with significant recreation use, trash, resource damage, and habitat fragmentation (Beaver Creek, West Clear Creek, Fossil Creek,

and numerous locations on Oak Creek. It is reasonable to expect that similar demand and impacts will occur at this new bridge.

There are additional plan components that should be included in the proposed plan amendment to accommodate the Verde Connect Project.

Forest Plan Management Direction	Current Language	Amendment	Discussion
Guidelines for Riparian Forest Types, FW-Rip-RipType- G-3, p. 43	In riparian forests, recreation activities, permitted uses, and management activities should occur at levels that maintain or allow improvement of soil function, riparian vegetation and water quality at the stream reach scale. This guideline would not apply to fine-scale activities and facilities such as intermittent livestock crossing locations, water gaps, or other infrastructure used to manage impacts to riparian areas at a larger scale.	In the Verde Connect Project area, where the road crosses the Verde River, natural streambank stability, riparian vegetation, and soil function would not be retained or restored on the 4 acres where the bridge columns are sited. This guideline would not be applied to the Verde Connect project.	Constructing, operating, and maintaining the Verde Connect road and associated bridge infrastructure would not meet the intent of the Forest Plan guideline to maintain or improve soil function and riparian vegetation. The project would result in unavoidable effects on riparian vegetation, streambank stability and soil function, as it will produce 4 acres of temporary and permanent disturbance in the 100-year floodplain on the Verde River. The bridge columns are a permanent negative impact larger than the livestock crossing locations and water gaps this guideline was designed to exclude. Although only a small portion of these 4 acres is on the Coconino National Forest, the bridge columns will be a resulting permanent adverse impact on the floodplain area.
Recreation, FW-Rec-All-G-2, p. 110	Recreational activities, locations, and/or settings should be managed to have minimal user conflicts, to be in balance with the capacity of other resources to support them, to promote public health	In the Verde Connect Project area, where the road crosses the Verde River, an almost certain increase in recreational use will occur. This will likely increase the potential for user conflicts	Constructing, operating, and maintaining the Verde Connect road and associated bridge would not retain the desired condition of retaining the natural character of areas used for dispersed

	and safety, and/or wildlife access to food, trash, and human waste.	especially with private landowners, will result in trash, sanitation issues, and resource degradation which could contaminate water supplies (public health) and could facilitate wildlife access to trash and human waste. This guideline would not be applied to the Verde Connect project.	recreation nor would it be in balance with capacity of other resources to support them. As mentioned above, human waste and litter, sanitation issues and resource damage are likely given the extremely high demand for access to perennial water on Forest Service lands.
Verde Valley Management Area, MA-VerdeV-G-2, p. 162	Recreation should be managed to reduce user conflicts, to maintain the desired conditions of other resources, and/or to promote public health and safety.	In the Verde Connect Project area, where the road crosses the Verde River, an almost certain increase in recreational use will occur. This will likely increase the potential for user conflicts especially with private landowners, will likely result in trash, sanitation issues, and resource degradation over time which could contaminate water supplies (public health) and could facilitate wildlife access to trash and human waste. This guideline would not be applied to the Verde Connect project.	Constructing, operating, and maintaining the Verde Connect road and associated bridge is likely to increase recreational use, especially at the bridge and shift the types of recreational use that would occur on a paved all season road. Given the proximity of private land, user conflicts are likely to increase. Natural streambank stability, native vegetation and riparian and soil function would not be retained where recreationists and others access the river corridor.
Dispersed Recreation, FW-Rec-Disp-DC-3, p. 113	Areas used for dispersed recreation across the forest retain their natural character to the extent possible and have minimal evidence of human waste and litter, sanitation issues, and resource damage.	Ditto above	Ditto above
Verde Valley Management Area, MA-VerdeV-G-1, p. 162	Projects and activities should be designed and implemented to maintain or improve watershed and riparian function/and/or prevent the introduction or spread of disease, invasive, or undesirable species.	In the Verde Connect Project area, where the road crosses the Verde River, natural streambank stability, riparian vegetation, and soil function would not be retained or restored on the 4 acres where the	Natural streambank stability, native vegetation and riparian and soil function would not be retained where recreationists and others access the river corridor. Although only a small portion of the 4-acres

		bridge columns are sited. This guideline would not be applied to the Verde Connect project.	impacted by the bridge is on the Coconino National Forest, the bridge columns will be a resulting permanent adverse impact on the floodplain area and will not improve riparian function. Mitigation measures do not address the introduction or spread of invasive or undesirable species from sources used for fill or other construction needs.
All Ecosystems, FW-Eco-DC-1, p. 19	Within their type and capability, ecosystems are functioning properly, provide habitat for native species, and are resilient to natural disturbances (such as flooding, fire, and periodic drought) and climate change. Ecosystem processes and contributions (for example, nutrient cycling, water infiltration, and wildlife habitat) are sustained, as vegetation on the Forest adapts to a changing climate.	In the Verde Connect Project area, where the road crosses the Verde River, natural streambank stability, riparian vegetation, and soil function would not be retained or restored on the 4 acres where the bridge columns are sited. This guideline would not be applied to the Verde Connect project.	The riparian ecosystem associated with the bridge and likely future recreation use will not function properly and certain ecosystem processes will not be sustained. These processes include natural streambank stability, native vegetation, and riparian and soil function.

If the forest proposes a site-specific plan amendment for the Verde Connect project because the project does not meet FW-Scenic-G-1, wouldn't the Verde Connect project also not meet FW-SpecUse-G-7 on page 106? This guideline states: "Structures, such as communication sites and utilities, should be designed to reduce contrast with the desired landscape character in accordance with scenic integrity objectives." According to the map in the proposed plan amendment, it appears as if the Verde River is designated as high SIO, and the bridge would not be compatible with this scenery integrity objective. The amendment language and discussion would be similar to that proposed by the forest for FW-Scenic-G-1.

Although there are several approved mitigation measures to reduce or mitigate the spread of invasive or noxious plant species in the final EA, VVNBA is concerned that these measures do not address the fill or other construction material needed for road construction from nearby borrow pits. Borrow pits are often contaminated with invasive/noxious species (such as invasive annual grasses that contribute to increased fire risk and spread) and are significant sources for the establishment and spread of unwanted species. Plan language related to this is located on p. 83:

Guidelines for Invasive Species

FW-Invas-G

- 1 Measures should be incorporated into authorized activities, project planning, and implementation to prevent, control, contain, and eradicate priority infestations or populations of invasive species to ensure the integrity of native species populations and their habitats is maintained.

We appreciate your consideration of the above points and look forward to discussing them with you. The more thoroughly we consider the proposed project, the more likely we are to create the best possible future for not only the National Forest but the entire Verde Valley.

Best Regards, and Wishes for Continued Health,



Todd Scantlebury

Attachments:

- VVNBA Dec 7, 2019 request to withdraw the original BUILD grant submitted by Yavapai County and awarded by FHWA
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