To Whom It May Concern,

This letter is in response to the Prescott National Forest scoping request regarding the upper Verde River Wild and Scenic River suitability study; in particular the possible construction of fish dams on the upper Verde River.

I own and operate the Aboriginal Living Skills School that has been based in Prescott, Arizona since 1991. My school teaches modern outdoor survival skills, primitive living skills and urban preparedness. Many of our courses are field based and include locales on the Verde River.

My intention for this letter is two-fold: one, concern as a business owner, and two, concern as a lover of wild places and respect for the natural world. My situation is unique in that we require *both* wild areas to hold courses *and* populations of fish and game as part of our curriculum. I understand both sides of the coin.

For more than 30 years, I have been intimately acquainted with certain locations on the Verde River, including where the proposed fish dams would be constructed. This experience involves hands-on knowledge of the plants and wildlife of the Verde River, how resources were most likely used in pre-history as sustenance by Native peoples, and the comparatively recent changes in fish populations. As an example, there is no question that native fish populations have dropped over the years, particularly after a Game and Fish program years ago that involved multiple people electroshocking miles of river in an effort to remove nonnative fish species. (From my experience, which involves literally being in the water and feeling under the banks for fish – before and after the electroshocking - the upper Verde River has never recovered from this action.)

The following bullet points, both comments and questions, are concerns that I have about the possible fish dams that are the main impetus for this PNF scoping request.

- The Verde River, in regards to the locations being scoped for the possible fish dam project, is truly an irreplaceable wild and scenic riparian environment. Any possible benefit derived from the dams would be wildly outweighed by the sheer inappropriateness of massive concrete barriers that would forever disrupt this wild landscape. Anyone who will take the time to hike this area of the river should understand for themselves that this is not an appropriate location for this type of infrastructure.

- As above, infrastructure of this magnitude would require continued maintenance, ensuring that there would always be disruptive activity in the middle of a wild and scenic place.

- Based upon our schools other negative experiences with Forest Service access “upgrades” to the Verde River, *any* access points, such as those used for maintaining the dams, *will* be abused by locals in off road vehicles to illegally access the river and drive *in* the river. Such access will further inflame the degradation of sensitive riparian flora and fauna.

- All of the above actions will degrade my business as an Outfitter Guide as I will lose access to these wild training areas due to the development. This effects my school curriculum and my financial bottom line as free flowing rivers in Yavapai County, and the resources they provide for my teaching curriculum, are extremely limited.

- While I am all for healthy native fish populations, the main damage I have witnessed to native fish populations in the Verde River were caused from people attempting to “fix the river.”

-As such, I am particularly against rotenone treatment of the river. As witnessed from the fish shocking results of nearly 20 years ago, in which it is now difficult to find any species of fish in the upper Verde River, rotenone application would be a disaster not just for whatever remaining fish are left, but for the other wildlife that depends on organisms, seen and unseen, for their survival.

-Over time, as nonnative fish will invariably be found upstream from the proposed fish dam, will the prospective dams prevent these fish from washing down into the native fish “safe zone” during the Verde Rivers typical flood season?

-What is the success of these fish dams at other locations?

-What is the research that shows these dams would produce viable results on the Verde River?

-What studies have been conducted to support the application of rotenone in the Verde River?

-What other species in the Verde River could be expected to be compromised from the application of rotenone?

-What safeguards have/will be taken to prevent the inability of river otter to obtain food after rotenone application?

-What, scientifically and historically, does a healthy native fish population look like in the Verde River and is this narrative obtainable in this part of the river by using fish dams?

-How would the dams effect the possible designation of the Verde River as a Wild and Scenic River?

-What are the names and organizations of the people supporting fish dams on the Verde River and where is the data showing that this will be successful for native fish populations?

-Has any study been conducted as to the impact - before, during, and after - caused by the construction of these fish dams in an extremely remote and sensitive riparian habitat?

-Who would pay for the dams and their continued upkeep?

-What other options have been studied to increase native fish populations in the upper Verde River besides concrete fish dams, and if so, have these ideas been applied in the field? If not, why not?

In closing, the upper Verde River is not appropriate for this type of large scale, invasive infrastructure that these dams epitomize. Knowing many of the wilderness variables at play in this area, there is no way that these dams would provide a permanent fix to the fish population of the Verde River. What would be permanent, however, is thousands of tons of concrete and rebar carved into a beautiful, remote riparian habitat, forever a monument to a bad idea for this sensitive area. Massive concrete fish dams in remote and disappearing Southwestern riparian habitat is not the appropriate response for reclaiming native fish habitat. Surely there are less invasive, more holistic options that would provide a win-win scenario for riparian wilderness and the wildlife that depend on it.

Sincerely, Cody Lundin

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