

April 11, 2022

Upper Verde WSR Suitability Study
Tony Papa, Deputy District Ranger
Bradshaw and Chino Valley Ranger Districts
Prescott National Forest
344 S. Cortez St.
Prescott, AZ 86303

RE: Upper Verde River Preliminary Wild and Scenic River (WSR) Suitability Study Scoping Comments

Tony Papa, Jason Williams, and the Interdisciplinary Team,

American Rivers is pleased to submit comments on the Prescott National Forest's (PNF) *Preliminary Wild and Scenic River Suitability Study*, evaluating the Wild and Scenic suitability for the Upper Verde River, specifically the 38.2 miles of Wild and Scenic eligible river generally west and north of Clarkdale, Arizona and east of Chino Valley, Arizona.

About American Rivers

American Rivers believes a future of clean water and healthy rivers for everyone, everywhere is essential. Since 1973, we have protected wild rivers, restored damaged rivers, and conserved clean water for people and nature. With headquarters in Washington, D.C., and 300,000 supporters, members, and volunteers across the country, we are the most trusted and influential river conservation organization in the United States, delivering solutions for a better future. Because life needs rivers. Our Southwest River Protection Program has offices in Durango, CO, and Flagstaff, AZ, and is deeply committed to the conservation of the most ecologically and culturally important rivers in the Southwest U.S.

Upper Verde River Preliminary Wild and Scenic River Suitability Study

American Rivers wholeheartedly supports the Forest's preliminary determination of "suitable" for all four segments of the Upper Verde River. The Wild and Scenic Rivers Act was created to protect high-value, free-flowing rivers such as the Upper Verde River. We fully agree with the Forest's list of the characteristics that would make the area a worthy addition to the National Wild and Scenic Rivers System (NWSRS).¹ The Upper Verde River has been found to possess Outstandingly Remarkable Values (ORVs) for Culture (54 sites), Scenery, Fish (10 species), Wildlife (17 species), Recreation (12 listed types), Geology, and Botany. Maintaining and enhancing these values is vitally important to help to address biodiversity loss, climate change, aridification, ecological fragmentation, and ever-increasing development in the region.

Free Flow Analysis

We agree that the two fish barriers proposed within the WSR eligible reach by the Bureau of Reclamation (BoR) have the potential to impact the ORVs and free-flowing character of the Upper Verde River. BoR's two preferred barrier designs, proposed to be located at Hell Point and 1.1 miles upstream of Sycamore Creek, almost surely would. However, American Rivers

¹ Section 2.2 Suitability Assessment, Upper Verde River Preliminary Wild and Scenic River Suitability Study, p. 2-6. March 2022.

believes that adding 1-2 fish barriers to the Upper Verde River might be able to be accomplished without compromising Wild and Scenic values. The choice at hand is not a binary one.

Since it appears that BoR's barrier analysis was completed without even considering Wild and Scenic eligibility, free-flowing character, or the ORVs inventoried, it would be worth asking the agency to update its analysis to see if it could propose barrier locations and designs that would maintain or enhance the Wild and Scenic values associated with the Upper Verde River.

To that end, we encourage the PNF to work with BoR to attempt to answer the following questions:

1. Is there a biological need for two fish barriers within the Wild and Scenic eligible reach of the Upper Verde River, when one would be much easier to mitigate?
2. Could the barrier(s) be sited such that they were outside of the Wild and Scenic eligible reach, for example, just above the town of Clarkdale? Or perhaps even lower in the developed portions of the Verde River basin?
3. Could the barrier(s) be designed and sited in ways that would better mimic natural drops, velocity barriers, steps, and other barriers to fish passage without unreasonably diminishing free-flowing character?
4. How might the fish barrier(s) in the Upper Verde River be better designed to maintain or enhance ORVs such as recreation, scenery, wildlife, etc.?
5. How might the fish barrier(s) in the Upper Verde River be designed to pass Section 7 review?

We also ask the PNF to work the U.S. Fish and Wildlife Service and Arizona Game and Fish Department to explore the ecological efficacy of the proposed barriers: How long is native fish habitat predicted to persist in the Upper Verde River under a warming climate? If less than 50 years, would the proposed barriers likely cause negative impacts or genetic bottlenecks for any other species in the Upper Verde River? Since free-flowing rivers are in themselves incredibly important to species in facing a warming climate, how are the federal agencies weighing and prioritizing the potential intermediate-term tradeoffs between fish barriers and interconnected river systems?

Native Fish Habitat Structures and Wild and Scenic Rivers

American Rivers is committed to supporting the continued restoration and recovery of sensitive, threatened, and endangered native fish in the Southwest U.S. Not only should WSR eligible streams providing critical habitat for spokedace, roundtail chub, Sonora sucker, desert sucker, longfin dace, and speckled dace qualify for Fisheries ORVs under the Wild and Scenic Rivers Act (as the Upper Verde River does), but such streams should also be prioritized for continued recovery work by the U.S. Fish and Wildlife Service and the Arizona Game and Fish Department under the Act's "maintain or enhance" standard for Fish ORVs.²

The federal Interagency Wild & Scenic Rivers Coordinating Council (IWSRCC) gives guidance on the construction and placement of native fish habitat structures on Wild and Scenic Rivers. Generally, structures to enhance fish and wildlife habitat are allowed if they:

1. Allow the area to remain natural in appearance;
2. Are compatible with the river's classification (wild/scenic/recreational); and

² Protection, conservation, and recovery work should also equally balance the conservation of imperiled non-fish species such as the Mexican garter snake, narrow-headed garter snake, Arizona toad, and lowland leopard frog.

3. Harmonize with the surrounding environment.

Even some structures that may affect the free-flowing nature of the river are sometimes allowed, provided they:

1. Mimic naturally occurring events (such as trees falling in/across the river, beaver dams, rock outcrops, opening or closing of existing secondary channels, etc.);
2. Do not create unusual hazards for recreation; and
3. Do not prevent naturally occurring events such as bank erosion or debris movement.

Structures should be made of native materials (logs, boulders, etc.) placed in locations, positions or quantities that mimic natural conditions, and anchoring materials such as cables and rebar should be installed in such a manner as to be visually acceptable. We believe that warranted, well-sited structures using “minimum tool” standards can be constructed to preserve other ORVs including non-fish imperiled species, free-flowing character, cultural sites, and recreational uses while aiding in the recovery of endangered fish. Examples of such fish barriers can be found on the Wild and Scenic Fossil Creek in AZ, and on the Wild and Scenic eligible Cabin Creek in MT.

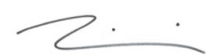
In addition to the criteria listed above, American Rivers advocates that fish barriers are created with the forethought that they might be temporary, meaning that future conditions and new data might warrant their removal. This potentiality should be built into all barrier designs.

In cases where proposed fish barriers would impact the free-flowing character of a river, other important terrestrial or aquatic species, cultural sites, and/or other ORVs; American Rivers recommends either 1) mitigating the design of the barrier to better balance maintaining or enhancing all stream values, 2) locating the barrier upstream or downstream of the Wild and Scenic eligible, suitable, or designated reach, or 3) in extreme cases, removing the proposed fish barrier site from the eligible, suitable, or designated reach of river. In the case of the Upper Verde River, there appear to be potential barrier sites upstream and downstream of the WSR eligible section of river, as well as potential design improvements, that have not been sufficiently analyzed by BoR. These sites and designs may be more expensive to develop or present other challenges, but in our estimation the long-term ecological and cultural integrity of Upper Verde River requires the added effort and potential expenses.

Conclusion

Thank you for the opportunity to comment on the preliminary WSR suitability study for the Upper Verde River. American Rivers strongly supports the Forest’s preliminary findings of “suitable” for all four sections of the Upper Verde River. We also believe strongly in the conservation of native fish, and that strategies exist that could potentially protect both the river’s free-flowing character and ORVs while enhancing native fish conservation. As always, we would be happy to discuss any issues related to WSR suitability for the Upper Verde River either in person or over the phone.

Sincerely,



Michael Fiebig
Director, Southwest River Protection Program
American Rivers