



April 11, 2022

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

Submitted via public comment portal at <https://cara.fs2c.usda.gov/Public//CommentInput?Project=61191>

RE: Comments on NEPA Project 61191: Upper Verde Preliminary Wild and Scenic Suitability Study and Free Flow Analysis

Dear Mr. Papa,

American Whitewater would like to thank the Prescott and Coconino National Forests for the opportunity to provide our support for the preliminary suitability findings on the Upper Verde River in Arizona. In our below comments, we provide feedback on the preliminary suitability and free flow analysis reports.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with over 6,000 members and 100 local-based affiliate clubs, representing whitewater enthusiasts across the nation. American Whitewater's mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. The organization is the primary advocate for the preservation and protection of whitewater rivers throughout the United States and connects the interests of human-powered recreational river users with ecological and science-based data to achieve the goals within its mission. Our vision is that our nation's remaining wild and free-flowing rivers stay that way, our developed rivers are restored to function and flourish, that the public has access to rivers for recreation, and that river enthusiasts are active and effective river advocates.

American Whitewater played a key role in the original passage of the 1968 Wild and Scenic Rivers Act, is a founding member of the National Wild and Scenic Rivers Coalition, and has worked to protect numerous rivers under the Wild and Scenic Rivers Act. American Whitewater and our members highly value the Upper Verde river for all of its Outstandingly Remarkable Values (ORVs), including both recreation and native fish.



Preliminary Wild and Scenic Suitability Report

Suitability Determinations and Recreation ORV

American Whitewater applauds the Forest Service for its work on the preliminary Wild and Scenic Suitability Report and we strongly agree with the suitability determinations for all four segments of the Upper Verde River.

As the NEPA process for suitability continues, more detail will be needed describing the recreation ORVs. Especially since the suitability determinations and the ORVs that are the basis of those determinations will help determine if the fish barriers should be constructed and how they will be designed. American Whitewater is available to provide additional guidance on the outstanding river recreation opportunities that exist on the Upper Verde and we provide an overview below.

Canoes, kayaks, rafts, and, more recently, pack rafts enjoy the Upper Verde river between Sullivan Lake and Beasley Flats, downstream from Clarkdale. The optimal flow season is from January to May, but the Verde can often be run all year-round. The perennial nature of the river provides a very unique river floating experience in Arizona and one that is accessible to a broad range of crafts and abilities.

The river corridor above Perkinsville has been described as “a verdant forest and beautiful tree-lined riverbanks in the oasis of central Arizona that is surrounded by desert.”¹ The section between Perkinsville and Beasley Flats is known as a “beautiful and scenic river valley characterized by desert riverbanks, willow and cottonwood trees, ocotillo, Saguaro cactus and a verdant ground cover of desert scrub.”² Floaters come from around Arizona and beyond to float and camp along the wild and untouched River.

River recreationists travel to and enjoy the Upper Verde not only for the experience of floating down a river, but for all of the values that make the river special, including both a wild river free of manmade obstructions and for healthy fish habitat. American Whitewater requests that all four segments retain their suitability determination and that significant resources are dedicated to determining how native fish habitat can be achieved in harmony with the Wild and Scenic Rivers Act and current Forest Service management to protect all identified ORVs in the river corridor.

Segment Classifications

The Forest Service should further assess the preliminary classifications of the segments and American Whitewater recommends that Segment 3 be classified as “Wild”. Since the previous classification determinations, significant changes in landownership and development have occurred. As the Forest Service notes in the Preliminary Suitability Report³ the Rio Verde Ranch is now in public ownership

¹ <http://southwestpaddler.com/docs/verde2.html>

² <http://southwestpaddler.com/docs/verde3.html>

³ United States Forest Service. (2022). Upper Verde River Preliminary Wild and Scenic Suitability Study. Page I-8.



within the Prescott National Forest and all of the structures have been removed except for the historic ranch cabin. As part of the Suitability Study, the FS needs to assess all of the relevant changes to the river corridor that have occurred since the previous classification effort. American Whitewater and our partners look forward to being involved in this process and providing information and recommendations on

Free-flow Analysis Report

The location of the two fish barriers are being proposed on one of Arizona's most iconic multi-day river floats and on one of Arizona's few perennial rivers. This segment would undoubtedly be impacted by the construction of a new, permanent fish barrier. We appreciate that the Bureau of Reclamation, Forest Service, and other project partners have been working diligently together to complete all the necessary steps before the barriers are approved, including the Wild and Scenic Suitability analysis. However, it is clear that the preliminary barrier designs would cause significant alteration and harm to the river corridor and its values, especially the intensive construction required and the permanent nature of the barriers. American Whitewater is supportive of the native fish recovery efforts on the Upper Verde and believes there is an opportunity here to balance the needs of native fish habitat with the numerous other river values, but there is significantly more work that needs to be done amongst all interested parties.

The Forest Service is on the right track with the process so far, including the below steps that are mandated by the Wild and Scenic Rivers Act and/or the USFS Handbook:

- Identifying that the proposed fish barriers may impact the free-flow of the river and the eligible river segments.
- Completing a Free Flow Analysis and determining that the barriers, as proposed, will have numerous impacts to the river corridor and its values, with river running being the recreational activity that will be affected the most.⁴
- Initiating a Suitability Study to further analyze the river segments and a preliminary determination of Suitability for all four segments prior to beginning an Environmental Assessment or Environment Impact Assessment* of the fish barriers.
- Facilitating opportunities for public input.

Following these initial steps, American Whitewater requests that the below actions are taken:

- Continue the Suitability Study process with robust opportunities for public input and consider American Whitewater's strong recommendations to identify all segments as suitable and reevaluate the classification of Segment 3.
- *Complete a full Environmental Impact Analysis instead of an Environmental Assessment for the fish barriers in order to dedicate sufficient resources and opportunities for public input.

⁴ United States Forest Service. (2022). Upper Verde River, W&S Suitability Study & EA Free Flow Analysis Preliminary Wild and Scenic Suitability Study. Page 4-7.



- Work directly with the Bureau of Reclamation, public stakeholders, and other project partners to determine *if* the two identified barriers are the *best* possible option for fish recovery with the *least* impact to the river corridor, its preliminary classification, and the identified ORVs.

Based on the preliminary Suitability Study, Free Flow Analysis, and the preliminary fish barrier designs, it is clear that significantly more work needs to be done to determine a fish recovery plan that meets the legal, administrative, ethical, intrinsic, and fiscally responsible needs of the Upper Verde river corridor.

Thank you for considering American Whitewater's comments on NEPA Project 61191 and we look forward to working with the Forest Service, Bureau of Reclamation, and other interested parties during this process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kestrel Kunz'.

Kestrel Kunz

kestrel@americanwhitewater.org

Associate Stewardship Director

Southern Rockies Program

American Whitewater