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April 11, 2022

Tony Papa, Deputy District Ranger
cc Jason Williams, Wilderness & Recreation Specialist
Prescott National Forest
344 S. Cortez St.
Prescott, AZ 86303

RE: Upper Verde Wild and Scenic Suitability Study #61191 scoping.

Submitted via <https://cara.fs2c.usda.gov/Public//CommentInput?Project=61191> with email cc to jason.a.williams@usda.gov

Dear Deputy District Ranger Papa,

We appreciate the opportunity to submit this letter serving as scoping comments from Wild Arizona, on the Prescott National Forest's (PNF) preliminary Wild and Scenic River Suitability Study, evaluating Wild and Scenic suitability for the Upper Verde River (38.2 miles of Wild and Scenic eligible river generally west and north of Clarkdale, Arizona and east of Chino Valley, Arizona).

Wild Arizona is a statewide conservation organization working to protect, unite, and restore wild lands and waters across Arizona and beyond. We pursue this mission for the enrichment and health of all generations, and to ensure Arizona's native plants and animals a lasting home in wild nature. Originally founded in 1979 and now with 3000 member/supporters, Wild Arizona has a long history of wilderness and wild rivers advocacy; outdoor events with our supporters; field research, including springs/natural waters surveys; GIS connectivity analysis; habitat and corridor exploration; native fish conservation and translocation, springs and riparian restoration, and planning engagement with agencies including the Prescott NF, AZ Game and Fish Department, US Fish and Wildlife Service, and the Bureau of Reclamation.

Upper Verde River Preliminary Wild and Scenic River Suitability Study

The Preliminary Suitability analysis is very well done and we concur that the four segments are suitable.

We also agree with the PNF's list of the characteristics that make the area a worthy proposed addition to the National Wild and Scenic Rivers System (NWSRS); this list includes these Outstandingly Remarkable Values (ORVs) - Cultural, Scenic, Fish, Wildlife, Recreational, Geology, and Botany.¹ That said, we think it is critical to recognize the importance of seeps and springs within these segments. These keystone riverine ecosystems support the river's baseflow, are indicators of regional aquifer integrity, are essential to all the other ORVs, and are increasingly threatened². Honoring and enforcing the "maintain and enhance" clause of the Wild and Scenic Rivers Act (WSRA) will be essential to protect these riverine values in the face of impacts from biodiversity loss, climate change, aridification, ecological fragmentation, and ever-increasing development in the region.

We wish to note that the Suitability Study is narrowly constrained to only analyze if the proposed fish barriers have the potential to impact the free-flowing condition or outstandingly remarkable values in the eligibility of the Upper Verde Wild and Scenic River (UVWSR) for Congressional designation. It does not therefore consider the full environmental impact of the barriers on the habitat, wildlife, river connectivity, and other ORVs. In fact, we strongly recommend consideration that a full Environmental Impact Statement (EIS) on the proposed fish barriers be conducted; it would have been helpful if this Preliminary Study could have explained the constraints, described what is not considered, and made an explicit commitment to follow with the appropriate NEPA process, which is in our opinion a full EIS³.

Free Flow Analysis

We agree that the two fish barriers proposed within the WSR eligible reach by the Bureau of Reclamation (BoR) could potentially 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, Wild Arizona believes that it might be possible to install 1-2 fish barriers on the Upper Verde River without compromising Wild and Scenic values. Fish barriers are not inherently incompatible with WSR status, and the choice at hand is not necessarily an either/or decision.

The BoR 2010 appraisal study, overall, is an incomplete evaluation, limited to various engineering and cost considerations; this makes it difficult, if not impossible to assess whether the proposed fish barriers would protect or enhance the fish ORV along the Upper Verde River. Furthermore, since it appears that BoR's barrier analysis was completed without considering Wild and Scenic eligibility, free-flowing character, or the ORVs inventoried, PNF should

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

² See Springs Stewardship Institute springstewardshipinstitute.org and access to the Springs Online Database <http://springsdata.org/>

³ 40 CFR 1502.3 Statutory requirements for statements: "... major Federal actions significantly affecting the quality of the human environment..."

request 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. Lastly, the existing analysis of barrier impacts on the provisional ORV's applies to the Scenic section defined in the PNF Eligibility Study. We recommend that the Suitability Study further analyze the effects on a Wild class reach.

On pages 4-5, regarding site one access, the discussion severely understates the difficulty of constructing a road from Hell Point to the river. Constructing a road here would cause severe scarring and unrepairable landscape damage. We also object strongly to road construction with multiple river crossings from the confluence to the barrier site.

Since the Preliminary Eligibility study was completed, the private property known as Rio Verde Ranch has moved into public ownership as part of PNF. The buildings have been removed, except for a historic ranch cabin. As a result, we urge that the river qualifies for Wild status beginning at the PNF western boundary.

Thank you for the opportunity to comment on the Preliminary WSR Suitability Study for the Upper Verde River. Overall, we believe that PNF has drafted a very good analysis, subject to these suggestions. Wild Arizona expresses our strong support of the PNF's preliminary findings of *suitable* for all four sections of the Upper Verde River. We also express our strong support for the conservation of native fish, and emphasize that strategies exist, which could potentially protect both the river's free-flowing character and ORVs while enhancing native fish conservation. We would be happy to discuss any issues related to WSR suitability for the Upper Verde River either in person or over phone/video.

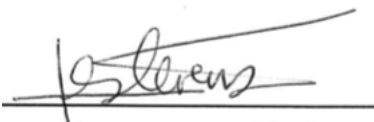
Regards,



Kelly Burke, Executive Director



Joel Barnes, PhD, Rivers Ecologist



Larry Stevens, PhD. Senior Ecologist