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Forest Service

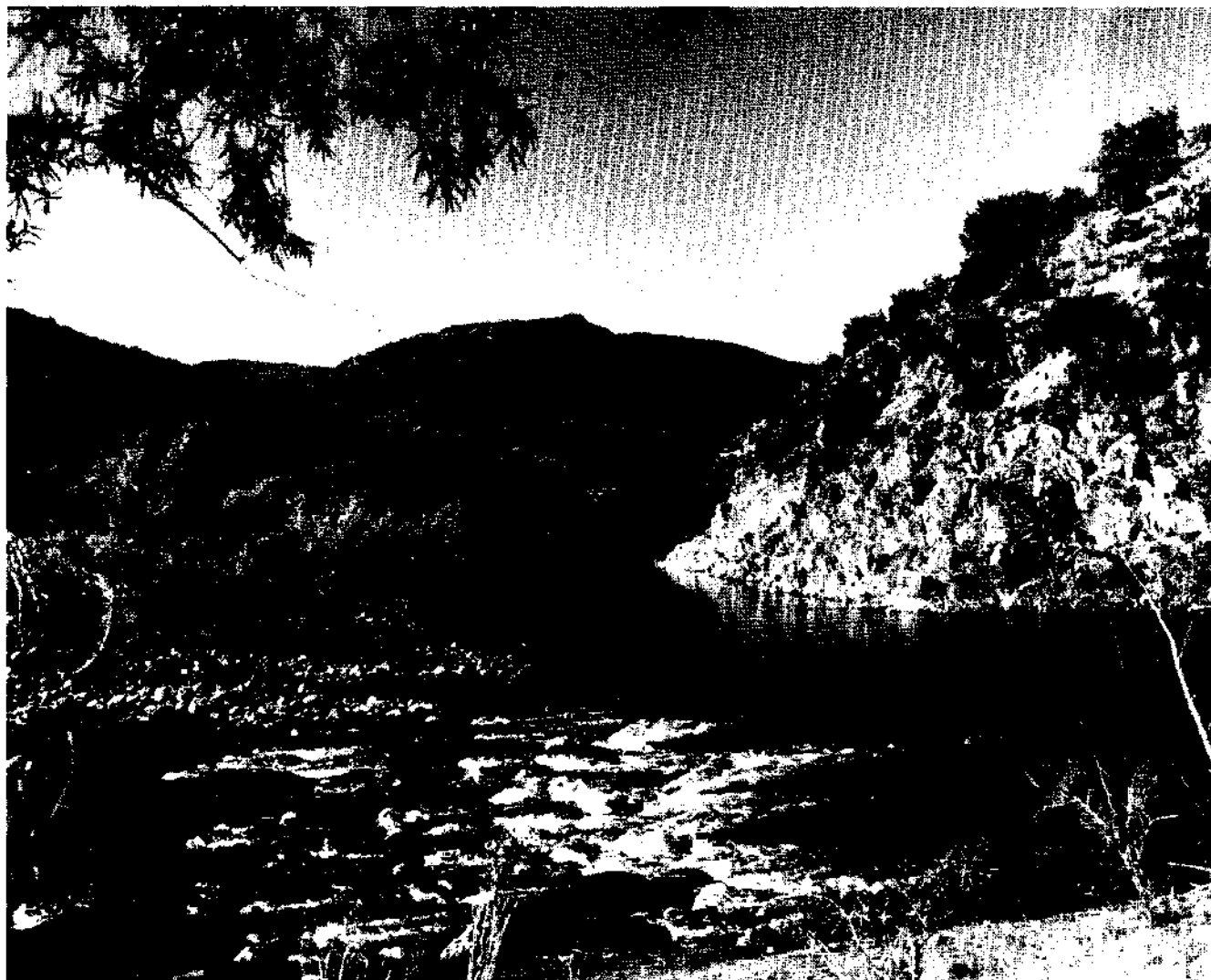
Coconino, Prescott and  
Tonto National Forests

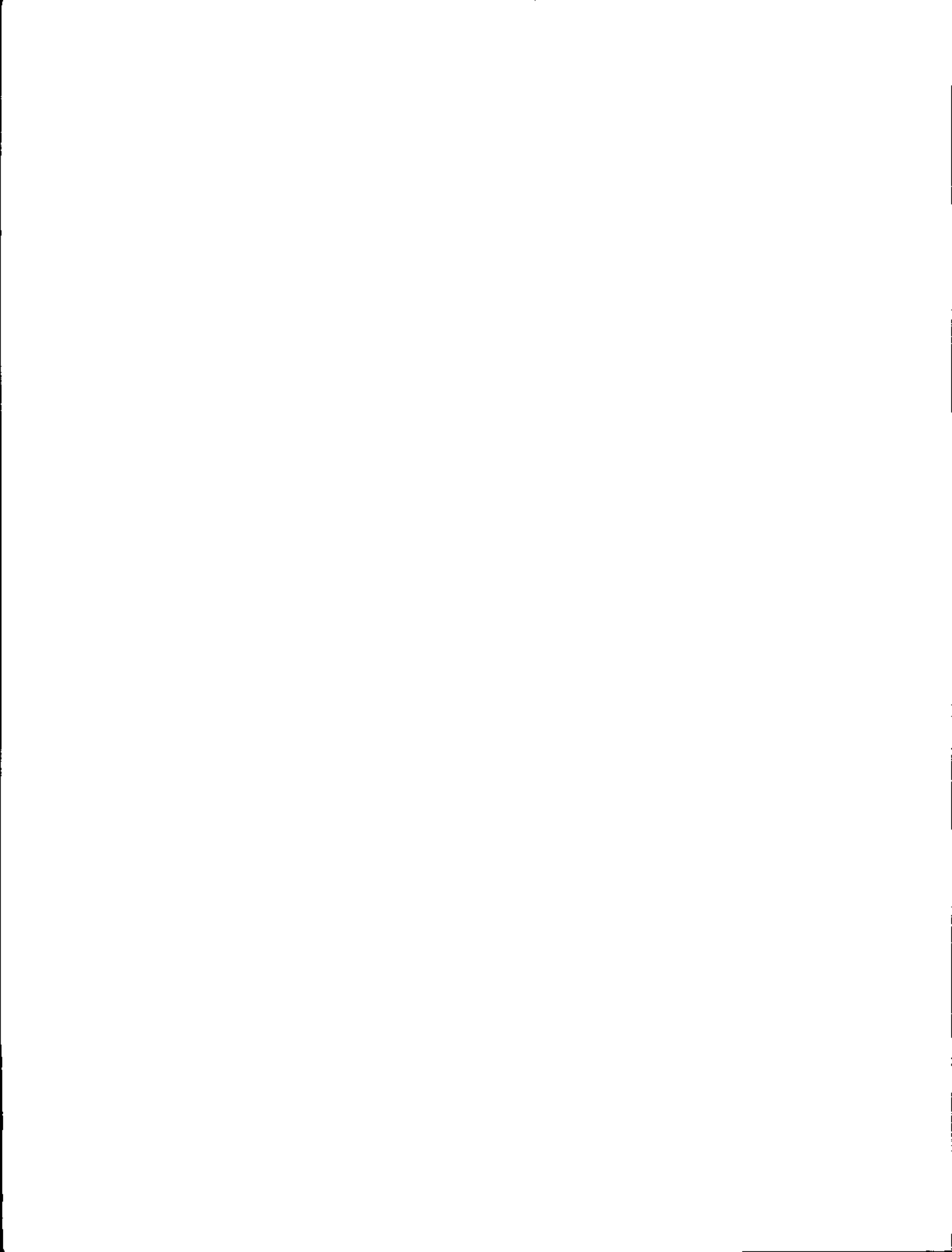
Southwestern Region,  
April 1981



# VERDE RIVER

## Wild and Scenic River Study Report and Environmental Impact Statement





903/D-615

ENVIRONMENTAL IMPACT STATEMENT

Verde River  
Wild and Scenic River Study Report  
Yavapai and Gila Counties, Arizona

Responsible Federal Agency:

USDA-Forest Service

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Flagstaff, Arizona 86001

Prescott National Forest  
P. O. Box 2549  
Prescott, Arizona 86302

Tonto National Forest  
P. O. Box 29070  
Phoenix, Arizona 85038

Responsible Official:

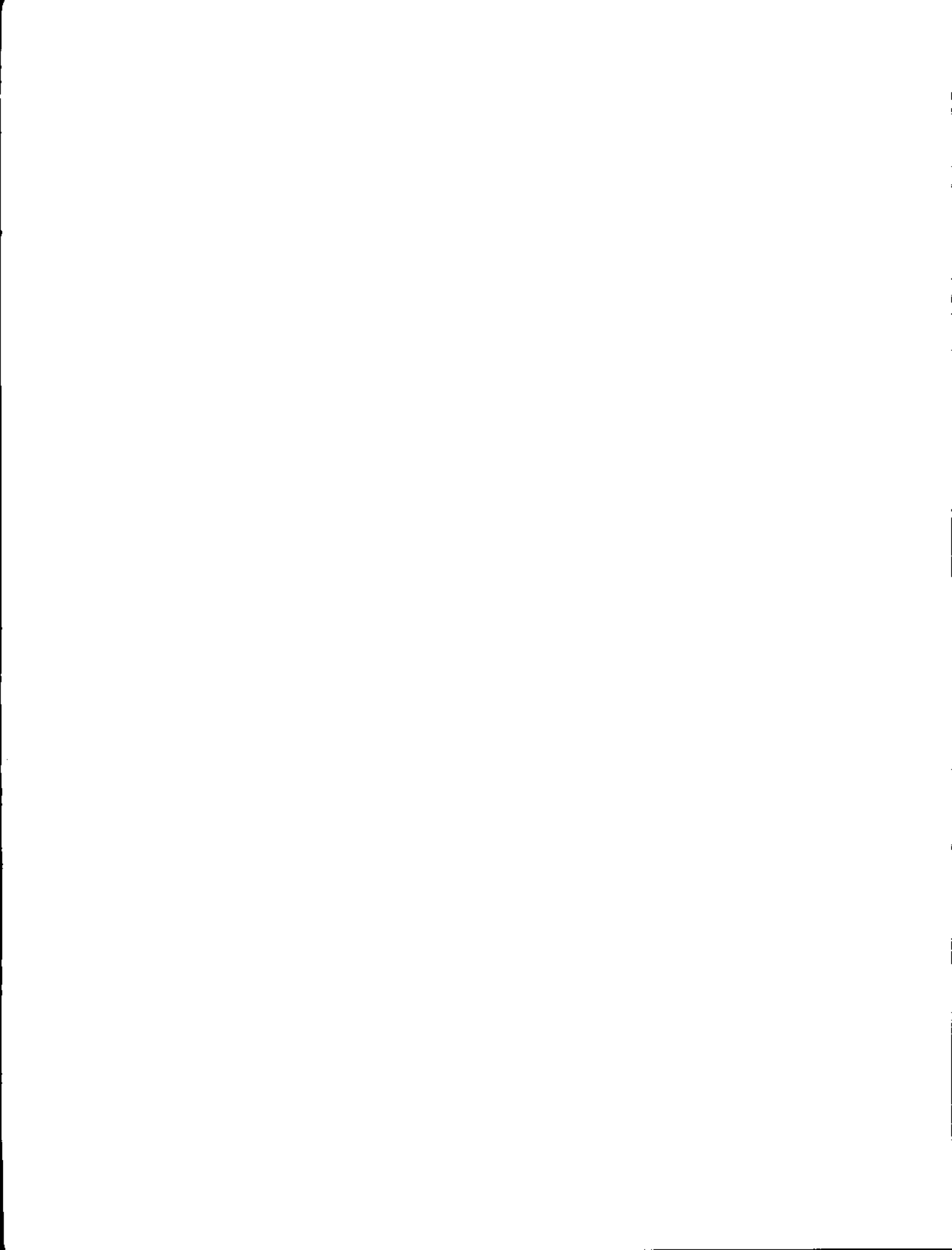
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Abstract:

This Environmental Impact Statement discusses the Verde River's eligibility for inclusion in the National Wild and Scenic Rivers System. The statement describes four alternative actions and the estimated effects of each. Alternative B, a proposal to include 39.5 miles of the river into the National Wild and Scenic Rivers System has been identified as the preferred alternative. The rationale for selecting this action is also discussed.



## SUMMARY REPORT

- I. BRIEF DESCRIPTION OF THE PROPOSED ACTION: The study found that the 78 miles of the Verde River designated for study in the Wild and Scenic Rivers Act, as amended, is eligible for inclusion in the National Wild and Scenic Rivers System. However, the proposed action would designate only 39.5 miles of the river. A 38.5 mile section of the river between the Forest boundary near Paulden and Clarkdale is excluded from the proposal. Of the 39.5 miles of river affected by the action, 22 miles meet scenic river criteria, and the remaining 17.5 miles are suited for a wild river classification.

This recommendation, if implemented, would provide statutory protection of a highly scenic free-flowing river. The action would also provide opportunities for increasing the diversity of dispersed recreation use.

The primary issue emerging from public involvement was, "should the Verde River and its immediate environment (study corridor), or portions thereof, be designated as a component of the National Wild and Scenic Rivers System or should present management direction continue." This question was raised during each public meeting as well as by the Wild and Scenic Rivers Act itself. It is the primary issue addressed in this study.

In addition, several other issues and concerns were identified by the public and are addressed in this study. These issues include:

What is the effect of wild and scenic river designation on opportunities for future development, i.e., diversions, recreation sites, roads, and power transmission line corridors?

If the river and its environment are designated, what would be the extent, provisions, and consequences of easements acquired on private land?

Are there possible conflicts between needs for more water storage and a designation which would maintain a free-flowing river?

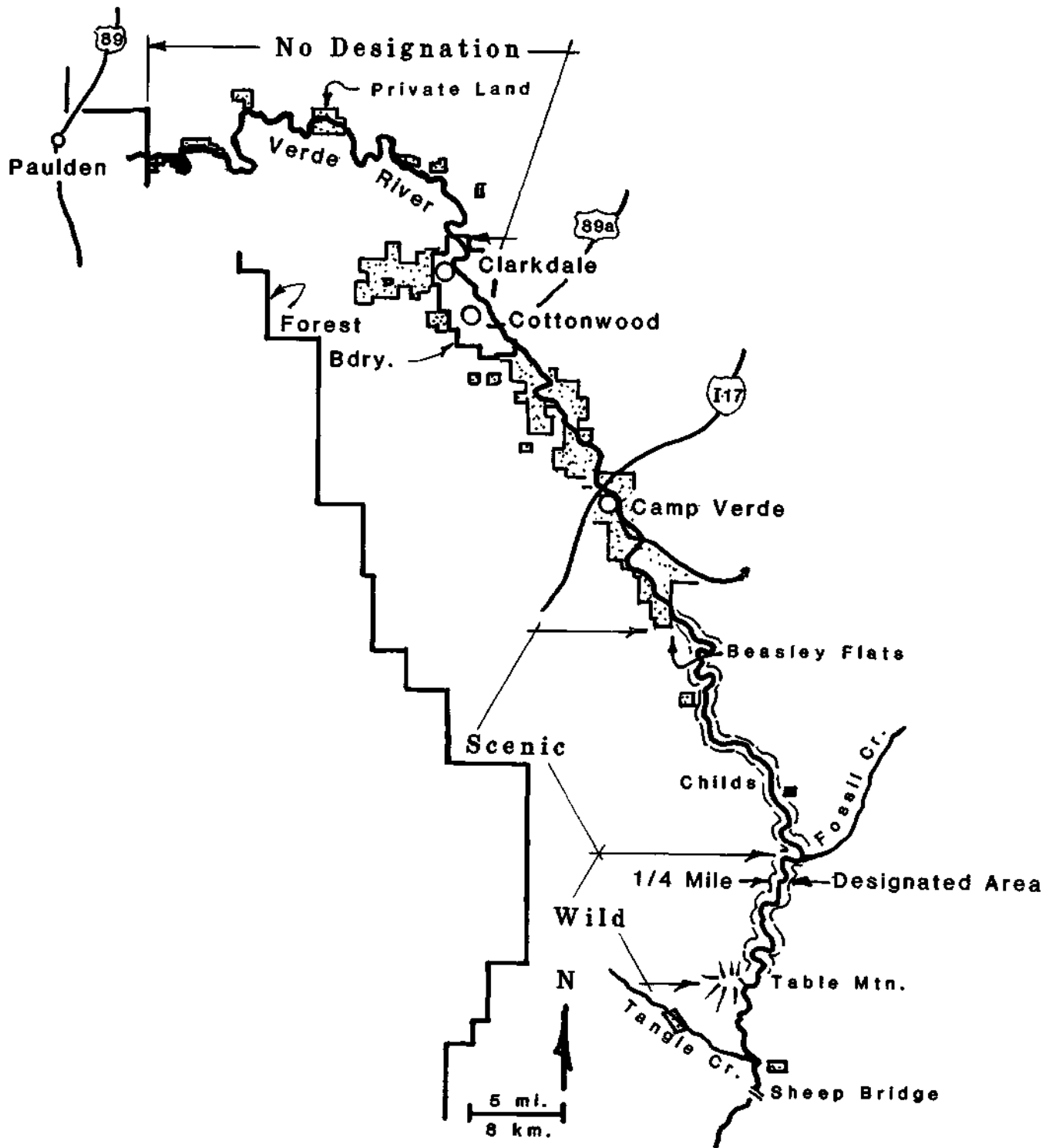
What effect would a wild and scenic river designation have on habitat management for the bald eagle?

What effect would a wild and scenic river designation have on geothermal leasing, exploration, and development?

No other Federal actions are discussed in this Environmental Impact Statement.

II. ALTERNATIVES CONSIDERED: During the study process, five alternatives were considered. However, one alternative which added 10.5 miles to the south end of the designated study area near Table Mountain, was eliminated during the evaluation process.

- A. Alternative A. (No Designation - No Action) Under this alternative, none of the 78 miles of eligible river would be added to the National Wild and Scenic Rivers System. The present management policies and programs of the three National Forests involved would continue. Future management of the National Forest lands would be directed and controlled by the Land and Resource Management Plans developed for the respective Forests in accordance with the National Forest Management Act of 1976. The constraints on existing or future uses of the private lands would be minimal.
- B. Alternative B. (Designation of the segment of the river from Beasley Flats to the vicinity of Table Mountain.) This alternative would designate a total of 39.5 miles of eligible river. The segment from Beasley Flats to the confluence of Fossil Creek, 22 miles, would be classified scenic. The remaining segment, 17.5 miles, would be classified wild. Some access routes would be improved and parking and sanitation facilities would be provided as needed. Emphasis would be placed on protecting the natural values of the river area. Zoning ordinances or the acquisition of a scenic easement may be used to control development of the included private lands. This alternative was selected as the preferred alternative (See map on page iv).
- C. Alternative C. (Designation of all eligible river segments except for a 5.5 mile section of the river at the upstream end of the study segment.) The alternative would designate all eligible segments except for a 5.5 mile section and would total 72.5 miles. The upstream 33 mile segment would be classified recreational and the remainder would be classified as in Alternative B. A portion of the included 737 acres of private land would be subject to land use controls in the form of zoning ordinances, scenic easements or combinations of both. Management and development of the river area would be the same as in Alternative B.
- D. Alternative D. (Designation of all eligible segments.) Under this alternative all eligible segments would be designated for inclusion in the National Wild and Scenic Rivers System. A total of 78 miles of the Verde River would be protected and managed under the Wild and Scenic Rivers Act. This alternative is essentially the same as Alternative C, except an additional 5.5 miles of recreational river would be designated and about 763 acres more of private lands could be subject to land use controls.



Preferred Alternative

III. SUMMARY OF ENVIRONMENTAL EFFECTS: Environmental impacts associated with the proposed action include protection of the free-flowing character of 39.5 miles of the Verde River as well as protection of scenic, fish and wildlife, historic and cultural values. The opportunities for future water impoundments and hydroelectric power developments that would have direct and adverse effects on the designated segments would be foregone.

Improved access routes with associated parking and sanitation facilities would impose minor modification on the natural environment. Increased public use, in the general area of the improvements, would cause minor soil compaction and vegetative alterations. Recreation use is expected to increase as a result of designation.

Zoning ordinances or a scenic easement would restrict the development potential on one parcel of private land within the designated river segment.

IV. CONSULTATION WITH OTHERS: Opportunities for public participation in the study process were provided by five open houses and a workshop session. In addition, contacts were made with Federal and State agency representatives, state-wide user groups, County Board of Supervisors, range permittees, landowners, civic organizations, and other interested individuals. Preliminary alternatives were made available for public review through publication of a newspaper tabloid.

Over eight hundred copies of the Draft Environmental Impact Statement were distributed to the following agencies and organizations, and comments were received by those indicated with an asterisk.

Federal Agencies

Geological Survey	Bureau of Indian Affairs
Water Resources Council	Bureau of Land Management
National Park Service	* The Secretary of Commerce
Fish and Wildlife Service	Federal Highway Administration
* Department of Energy	* Federal Energy Regulatory Commission
* USDA - Soil Conservation Service	* USDI - Water and Power Resources Service
* Environmental Protection Agency	* Dept. of Housing and Urban Development
* Dept. of the Army-Corps of Engineers	Heritage Conserv. and Recreation Service
* USDI - Office of the Secretary	* USDA - Rural Electrification Administ.

Congressional Delegates

Senator Barry Goldwater	Representative John Rhodes
Senator Dennis DeConcini	* Representative Bob Stump
Representative Eldon Rudd	Representative Morris Udall

County

* Gila County Board of Supervisors	Yavapai County Board of Supervisors
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### Arizona State Agencies

- \* NACOG, Region III
- \* State Mine Inspector
- \* Office of Arid Land Studies
- \* State Land Department
- \* Department of Health Services
- \* Center for Public Affairs
- \* Outdoor Recreation Coord. Commission
- \* Agriculture & Horticulture Dept.
- \* Department of Transportation
- \* Prescott Historical Society
- \* OEPAD - Hathaway
- \* Arizona Natural Heritage Program
- \* Department of Game and Fish
- \* Department of Parks and Recreation
- \* Arizona Department of Public Safety
- \* Office of Economic Planning and Develop.
- \* Central Az. Association of Governments

### City Councils

- \* Prescott City Council

### Corporations

- \* Phelps Dodge Corporation
- \* Arizona Public Service Company
- \* Atlantic Richfield Company
- \* Dashney, Steel & Jensen, Incorporated

### Arizona State Legislators

Senator Leo Corbit  
Congressman Frank Kelley  
Congressman Jerry Overall

Senator Boyd Tenney  
Congressman John Hays

### Organizations

- \* Arizona Wildlife Federation
- \* Coconino Sportsmen
- \* Prescott Audubon Society
- \* Tucson Audubon Society
- \* The Prescott Junior Women's Club
- \* The Izaak Walton League of America
- \* KOKOPELI (Adventures in Learning)
- \* Yavapai-Apache Tribe
- \* Arizona Public Service
- \* SAEC-Southern Az. Environ. Council
- \* Northern AZ. Council of Govern.
- \* Earth First (National Wilderness Preservation Organization)
- \* Arizona Resource Council
- \* National Audubon Society
- \* The Wildlife Society
- \* Salt River Project
- \* Four Corners Wilderness Workshop
- \* Arizonans for Wild & Scenic Rivers
- \* Northern Audubon Society
- \* Yavapai-Prescott Tribe
- \* AWW-Arizonans for Quality Environment
- \* Verde Nat. Resource Conservation District
- \* Coconino Nat. Res. Conservation District

### Individuals

Comments were received from 332 individuals. See listing of individuals by preferred alternative in Appendix F of this document.



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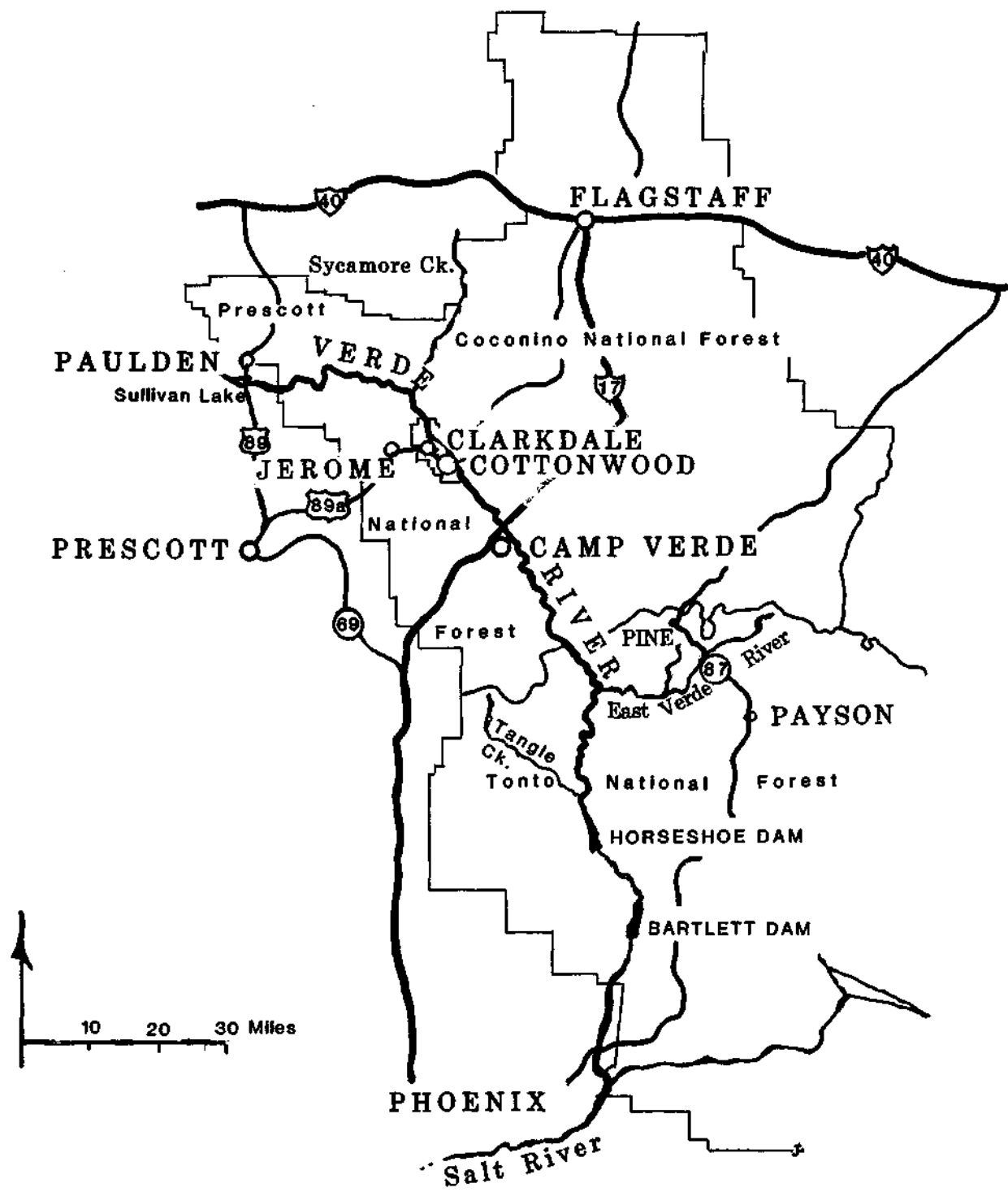
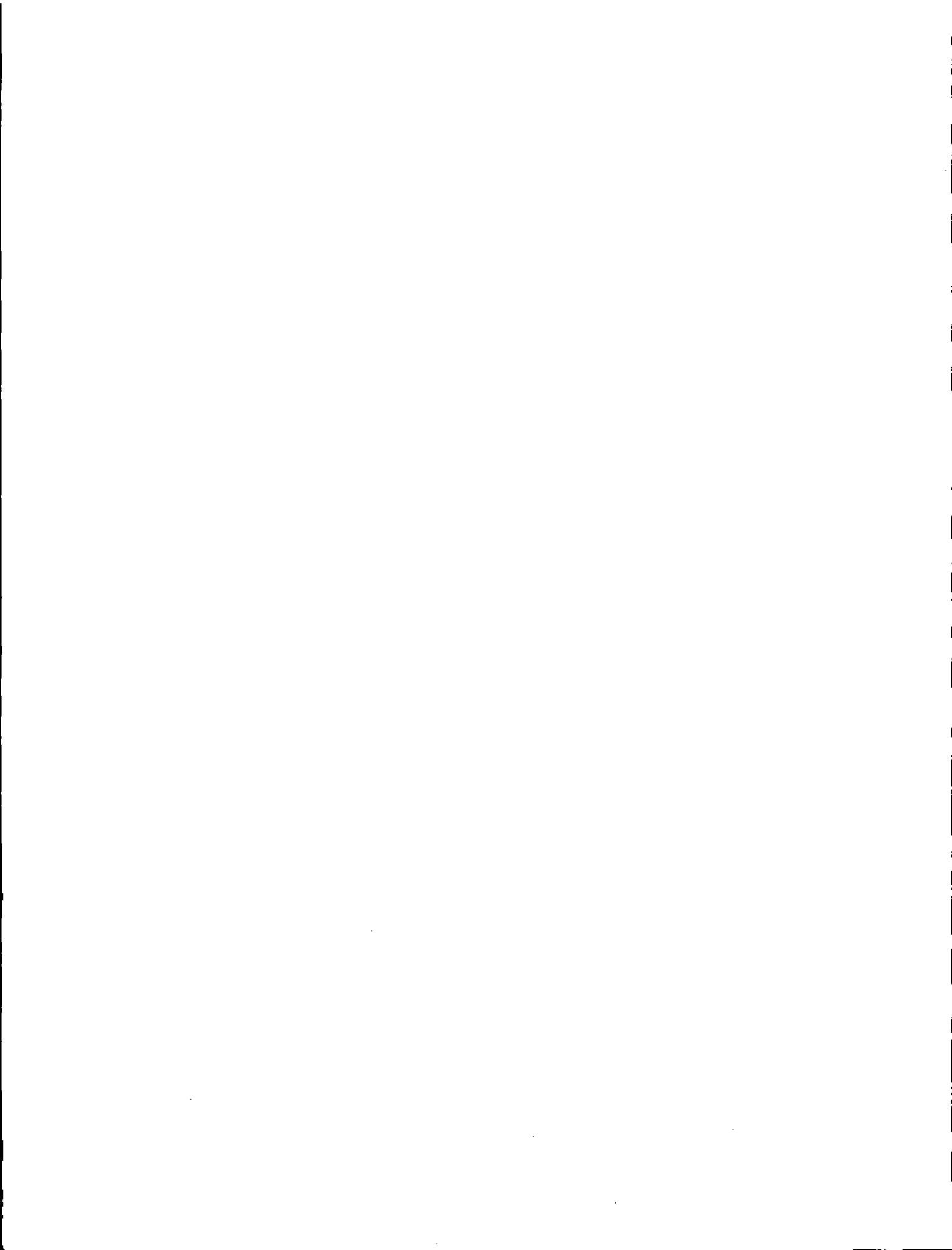


Figure 1 Location Map



## I. INTRODUCTION

### A. Background and Nature of Decision

In 1968, Congress passed the Wild and Scenic Rivers Act (P.L. 90-542) and redirected the water policy of this nation. Congress declared that:

"....the established national policy of dam and other construction at appropriate sections of rivers of the United States needs to be complemented by a policy that would preserve other selected rivers or sections thereof in their free-flowing condition to protect the water quality of such rivers and to fulfill other vital National conservation purposes."

Over the past several years public interest has increased to protect the remaining free-flowing segments of several rivers in Arizona, as well as throughout the United States. With the passage of the National Parks and Recreation Act (P.L. 95-625), the Wild and Scenic Rivers Act was amended by adding 17 rivers for study. Among these was the Verde River.

"The main stem from the Prescott National Forest boundary near Paulden to the vicinity of Table Mountain, approximately 14 miles above Horseshoe Reservoir, except for the segment not included in the National Forest between Clarkdale and Camp Verde, north segment."

Because the phrase "except for the segment not included in the National Forest between Clarkdale and Camp Verde, north segment" required some clarification, Staff from the Subcommittee on Energy and the Environment in the House of Representatives provided the following information:

The legislative intent was to exclude from the study that segment of river from where it leaves National Forest lands north of Clarkdale, Section 33, T17N, R3E, downstream to where it again enters National Forest land near the southwest corner of Section 26, T13N, R5E.

In addition to the designated study segment, the section of river between Table Mountain and the junction of Tangle Creek in Section 35, T9N, R6E, was also evaluated for possible inclusion in the National Wild and Scenic Rivers System. The decision to add the Tangle Creek section to the study was made following a recommendation by the Central Arizona Water Control Study, that the dam site at the Verde River/Tangle Creek confluence be dropped because of unsuitable geology.

## B. Purpose of Report

This report, prepared by the USDA, Forest Service, Prescott, Coconino, and Tonto National Forests, discusses the process used to analyze and evaluate characteristics of the study segment of the Verde River to determine whether it qualifies for designation as a Wild and Scenic River as defined in the 1968 Act. The public had an opportunity to comment on a preliminary decision published in a Draft Environmental Impact Statement (DEIS). A final recommendation based on the DEIS and subsequent public comment is documented in this Environmental Impact Statement. Congress directed that a report on the final recommendation be submitted to them not later than April 1981. At that point, Congress may accept or modify the recommendation when considering the Verde River for possible inclusion in the National Wild and Scenic Rivers System.

In addition to documenting the preferred alternative, the Wild and Scenic Rivers Act requires the report to show the following:

Location (pg. 2); characteristics which do or do not make the area a worthy addition to the system (pg. 31); reasonably foreseeable potential uses of resources enhanced, foreclosed, or curtailed if designated (pg. 60); administering Federal agency if designated (pg. 67); cost sharing by State and local government agencies (pg. 67); and the estimated cost to the United States of acquiring easements, lands, and of administering the area if designated (pg. 51)."

## C. Location

The Verde River originates in Big Chino Valley north of Prescott, Arizona, and is a major tributary of the Salt River, which flows into the Gila River.

The study area is divided into two river segments -- A and B. Segment A extends east from the National Forest boundary near Paulden, Arizona, to the north edge of the private lands in Section 33, T17N, R3E. Segment B extends south from the east edge of the private lands in Section 27, T13N, R5E to the junction with Tangle Creek in Section 35, T9N, R6E. The towns of Clarkdale, Cottonwood, and Camp Verde are located along the river between the two study segments. See maps on pages 14 and 15.



For the purpose of the study, boundaries were established to average about 1/4 mile on both sides of the river. With the exception of approximately 1,500 acres of private lands the study area encompasses National Forest lands. The river flows through Yavapai and Gila Counties.

D. Issues and Concerns

The primary issue emerging from public involvement is, "Should the Verde River and its immediate environment (study corridor), or portions thereof, be designated as a component of the National Wild and Scenic Rivers System or should present management direction continue." This question was raised during each public meeting as well as by the Wild and Scenic Rivers Act itself.

In addition, other issues and concerns, identified by the public, are addressed in this study. The issues include:

What effect would the wild and scenic river designation have on opportunities for future development, i.e., diversions, recreation sites, roads, and power transmission line corridors?

If the river and its environment (corridor) are designated, what would be the extent, provisions, and consequences of easements acquired on private land?

Are there possible conflicts between needs for more water storage and a designation which would maintain a free-flowing river?

What effect would a wild and scenic river designation have on habitat management for the bald eagle?

What effect would a wild and scenic river designation have on geothermal leasing, exploration, and development?

The concerns were:

What is the effect of wild and scenic river designation on rights and responsibilities regarding withdrawals for reclamation purposes?

Section 7(a) of the Wild and Scenic Rivers Act of 1968 prevents the Federal Power Commission, now the Federal Energy Regulatory Commission, from licensing any project directly affecting the river, and also prevents other Federal agencies from making construction loans or grants,

or issuing licenses for water resources projects.

What is the effect of designation on mineral prospecting, exploration, and development?

All prospecting, mining operations and other activities on mining claims which have not been perfected 1/ prior to adding the river to the system shall be subject to such regulations as the Secretary of Agriculture may prescribe to effectuate the purpose of the Wild and Scenic River Act. Also, subject to valid existing rights, the minerals in Federal lands which are part of the system and constitute the bed or bank or are situated within one-quarter mile of the bank of any river segment classified wild are withdrawn from all forms of appropriation under the mining laws and from operation of the mineral leasing laws.

Would the access for maintenance of stream gauging stations and development of additional gauges for an improved flood warning system be affected by designation?

Unobtrusive gauging stations and their continued maintenance are allowed under a wild and scenic river designation if there is no significant adverse effect on the natural character of the area.

If private landownership is retained, would road access through the classified area be allowed?

Rights of reasonable access to private land would not be denied. Road access through a designated area to private land would be allowed to the extent it does not significantly impact the natural character of the area.

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1/ "Subject to valid existing rights, the perfection of or issuance of a patent to any mining claim affecting lands within the system shall confer or convey a right or title only to the mineral deposits, and such rights only to the use of the surface and the surface resources as are reasonably required to carry on prospecting or mining operations and are consistent with such regulations as may be prescribed by the Secretary of Agriculture." (Wild and Scenic Rivers Act P.L. 90-542).

What effect will designation have on grazing of domestic livestock and development and maintenance of range improvements?

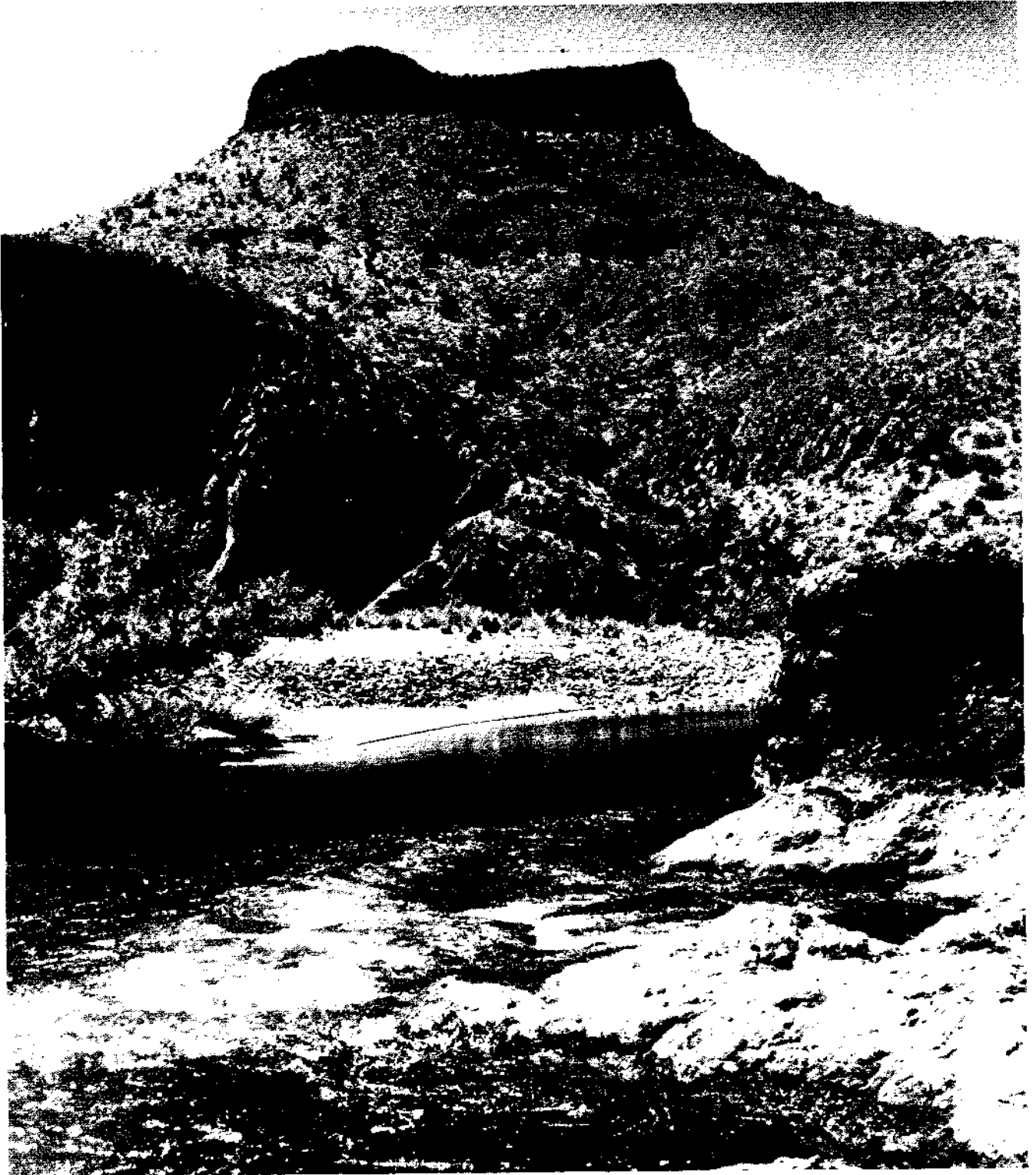
Livestock grazing would continue to the extent it does not detract from the values for which the river was designated and classified under provisions of the Wild and Scenic Rivers Act. Unobtrusive fences and other range improvements would be permitted if there is no significant adverse effect on the natural character of the area. Existing means of access for maintenance of improvements would be allowed to continue as long as they do not destroy the values for which the river was designated.

What is the effect on upstream communities and water users particularly as it relates to maintaining water quality and quantity standards of a designated river?

This concern was expressed by residents of upstream communities located outside of the study area. The Act specifies that the prescribed water quality standards will be maintained. However, this does not relieve the State of their water quality monitoring and enforcement responsibilities. Designation would add emphasis to maintaining the prescribed quantity of water required to maintain a free-flowing river.

What effect would designation have on existing manmade improvements?

Man-made improvements were inventoried during the study process, and their impacts on eligibility and classification were evaluated. Classification would not result in elimination of existing improvements.



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General view of the Verde River near Table Mountain-Tonto National Forest

## II. AFFECTED ENVIRONMENT

### A. Legal Setting

The Verde River flows through private and public lands. The public lands were set aside from the public domain as reserves prior to the Transfer Act of 1905. During the years that followed, there were several name changes, acreage transfers, etc., that resulted in the current boundaries of the Prescott, Coconino, and Tonto National Forests. Except for approximately 1500 acres of private lands contained in eight separate parcels along the river, the study area is managed by the U.S. Department of Agriculture, Forest Service. Since the Forest Service administers all the public lands, it has been designated as lead agency in conducting the study. Other Federal and State governmental agencies, as well as utility companies, statewide user groups, organizations and private individuals were consulted during the study process.

### B. General Setting

The Verde River Study Area is located within the boundaries of the Prescott, Coconino, and Tonto National Forests. Management questions are currently being addressed within the framework of multiple-use guides established for the Chino Valley, Verde, Sedona, Beaver Creek, Payson, and Cave Creek Ranger Districts. General management has been directed toward maintenance of natural conditions along the river corridor.

Because of the rugged terrain and lack of products sought by early settlers, there has been little development or use within the study area. However, there has been and is now, grazing of cattle along the river and its tributary canyons. Some mineral exploration has occurred in the past. However, little evidence of mining activity is evident today. Fire occurrence is low, and recreation use is limited to camping, picnicking, fishing, hunting, and occasional river running during peak flow periods.

### C. Socio-Economic Setting

The local users of the river are from the communities and towns of Bridgeport, Middle Verde, McGuireville, Jerome, Clarkdale, Cottonwood, Cornville, and Camp Verde. In general, these towns developed as service centers for ranching and mining areas surrounding the Verde Valley. The fertile soils adjacent to the river near the town of Camp Verde provided ample agricultural opportunities.

The profile of the valley today has changed considerably. It serves the tourism trade in Northern Arizona with nearby Jerome State Historical Park, Dead Horse State Park, Fort Verde State Park, Tuzigoot and Montezuma Castle National Monuments, National Forests and other scenic attractions, luring thousands of visitors yearly. Retail and wholesale trade is perhaps the largest single economic sector in the valley.

Besides attracting tourists, the valley has become a haven for retirees. The mild year-round climate is the major attractor. It is estimated that 20 percent of the Verde Valley's population is over 65 years of age. 1/

There are a few small ranches in the vicinity of the river that depend on National Forest lands for yearlong grazing. The river often provides the only reliable source of water during drought periods and plays an important part in the overall range management program.

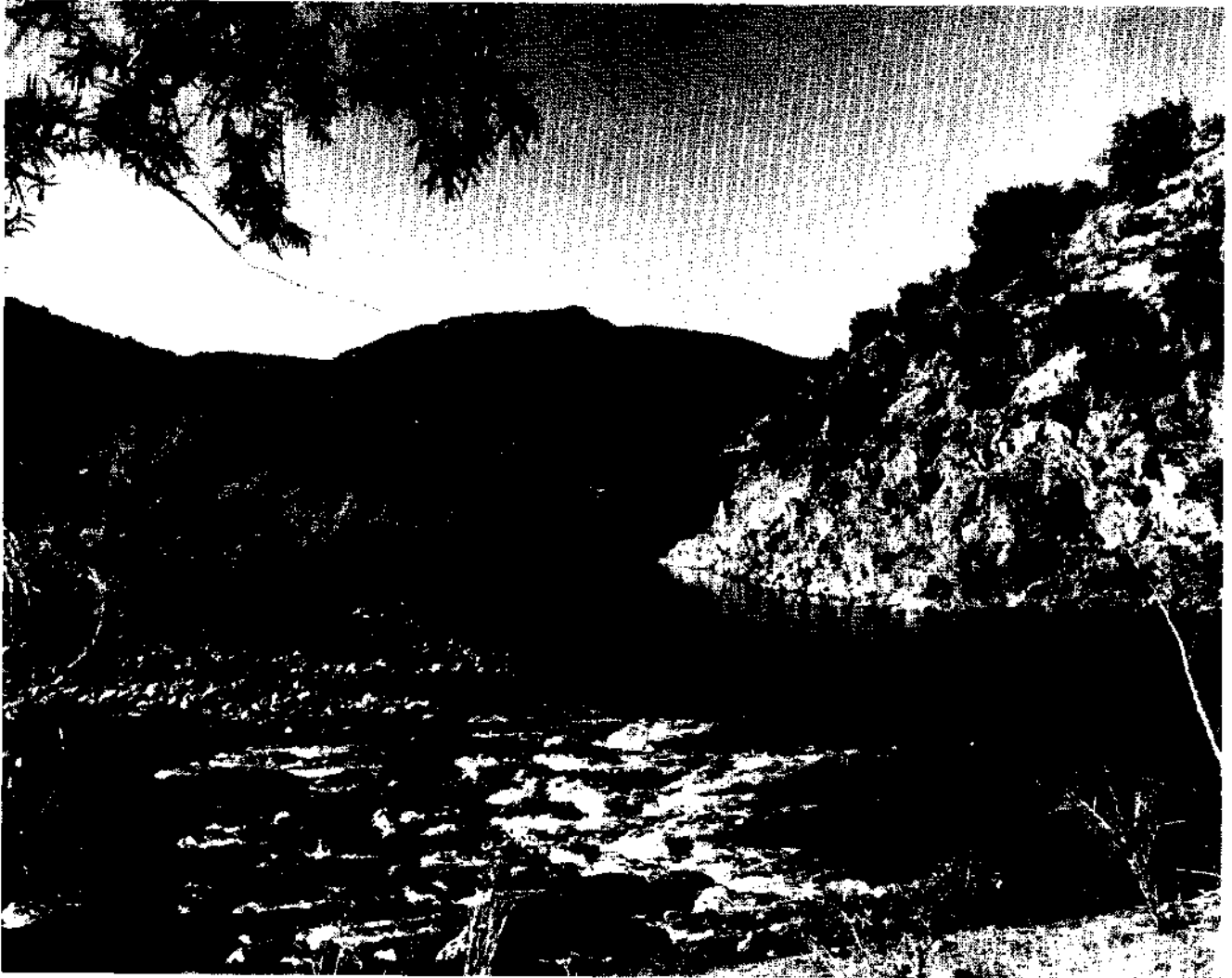
The local economy is growing at a low to moderate rate. Mining activities are restricted to production of cement by the Phoenix Cement Company in Clarkdale and other small amounts of "deposited" type minerals - gypsum, dolomite, halite, etc. If Phelps-Dodge Corporation elects to open-pit mine the low grade copper deposits beneath the town of Jerome, there will be a rapid social and economic change in the Verde Valley.

The local public interest in National Forest lands, as well as the river, is quite high because the Forest provides a substantial part of their outdoor recreational needs. Generally, the Verde valley residents favor a full range of uses with a minimum of constraints, rather than land classification, which may preclude some existing or potential land uses.

The larger surrounding towns of Prescott, Chino Valley, Ashfork, Williams, Sedona, and Flagstaff, are not as dependent on the river for recreation as the local population. However, it does provide a variety when compared to their predominantly "high country" recreation use opportunities. The river also is an attraction for the residents of the Phoenix metropolitan areas and out-of-state visitors. This use is expected to increase if the river is designated in the Wild and Scenic Rivers System.

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1/ Arizona Office of Economic Planning & Development - Phoenix, Arizona



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Verde River at the confluence of East Verde River-Tonto National Forest

#### D. Climate

The climate along the Verde River is characterized by hot summers, mild winters, moderate precipitation and abundant sunshine. Weather records have been maintained at Childs, Arizona, since 1915. The hottest temperature recorded at this site was 118°F in 1958. Normally, July is the hottest month, with the average daily maximum being 102°F. During January, temperatures sink to their lowest, with the average daily minimum being 33°F. The coldest temperature ever recorded was 2°F in 1937.

Precipitation averages approximately 16 inches per year (Sellers & Hill, 1974). Almost half is received between November and March as gentle rains, with much of the remainder falling during the summer thunderstorm period.

#### E. Cultural and Historical Background

The Verde River has long been known for its wealth of pre-historic and historic sites and played an important role in the development of Arizona. Six major divisions of this history can be made.

Paleo-Indian Period (12,000 B.C. to 8,000 B.C.) People of this era were primarily hunters who followed the movements of big game herds. Although no remains of this period have been verified, sites may be buried beneath alluvial and colluvial deposits.

Archaic Period (8,000 B.C. to A.D. 1) As the climate changed, the game herds died out, and people became more knowledgeable of other food resources, more emphasis was placed on the gathering of wild plant foods. Possible camp sites of this period are known and consist primarily of isolated projectile points and scatters of flaked stone.

Agriculturalists (A.D. 1 to 1425) Most prehistoric sites in the area date to this period. These valley inhabitants were known as the Southern Sinagua. Although probably developing from the earlier Archaic tradition, their culture was influenced by nearby groups. Earliest sites are pit house villages in the uplands, suggesting a hunting and gathering food base supplemented by farming areas along the Mogollon Rim. Later, pueblos in the open as well as cliff dwellings came into use, culminating in the large pueblos such as Tuzigoot and Montezuma's Castle.



Historic Hunters and Gatherers (A.D. 1425 to 1865) When the first Spanish explorers entered the Verde Valley in 1583, they found it occupied by the Northeastern Yavapai Indians. The Yavapai lifestyle was similar to that of the Archaic Period, being dependent upon a seasonal cycle of hunting and wild plant food harvesting. Some irrigation farming was also practiced.

The Pioneer Settlers (1865-1875) Farmers first entered the Valley from Prescott in 1865. Hostilities with the Yavapai Indians developed as increasing numbers of settlers moved into the Valley, disrupting the traditional Yavapai lifestyle by restricting access to food collecting areas. Fort Verde was established as a military base to control these conflicts and later became a reservation. The Yavapai Indians were moved out of the area in 1875 but returned to Fort Verde after 1898.

Miners and the Railroads (1875 to Present) In 1876, copper mines near Jerome that had been used in prehistoric times were rediscovered. In 1886, the Atlantic and Pacific Railroad was completed into Prescott. Ore could then be hauled by mule train from Jerome to Prescott, causing an economic boom in the Valley. When copper prices fell in 1891, the cost of hauling ore by mule became prohibitive. Consequently, a narrow gauge railroad from Jerome to Chino Valley was built and used until the smelter at Jerome was moved to a new site on the Verde River. This became the company town of Clarkdale. The Verde Valley Railroad was constructed in 1911 to connect Clarkdale with the Ash Fork-Prescott Railroad and is still used today.

#### F. Vegetation

The Verde River, as it meanders through the rugged terrain, creates a deciduous riparian forest and woodland subformation. The adjacent landscape beyond the river's influence consists of two distinct vegetative subformations. The pinyon-juniper woodland type dominates the river segment north of Clarkdale and gradually gives away to the Sonoran desert type with large inclusions of semi-desert grasslands in the segment south of Camp Verde.

The dominant plant species arrangement outside the riparian zone is a shrub overstory with a grass understory. Pinyon and juniper are often intermixed. The principal shrubby species are mesquite, catclaw, shrub oak, prickly pear, and creosote bush.

The dominant grasses include sand dropseed, three-awn species, galleta, blue grama, and sideoats grama.

The Verde River is virtually unsurveyed for threatened and endangered plant species. However, it is suspected that nine plants, that are listed or proposed for listing as threatened or endangered, exist in the study segments. See list in Appendix B of this document.

The riparian vegetation along the river is strongly influenced by physical features such as geology, channel width, and stream gradient which influence the existence of alluvial benches. Other factors which also affect the riparian vegetation are grazing and water level fluctuations due to seasonal flooding and withdrawals. Extrapolation of Forest Service research <sup>2/</sup> indicates that less than 20 percent of the river's length from the Forest boundary near Paulden, Arizona, to the Tangle Creek junction near Horseshoe Reservoir, is capable of producing quality riparian vegetation. The most productive sites are contained in the river segment between Beasley Flats and Tangle Creek.

As a general rule, the riparian areas are dominated by hardwoods and shrubs. The principal species are cottonwood, willow, ash, Arizona oak, hackberry, seepwillow, burrobrush, baccharis, desert willow, mesquite, salt cedar, and occasional Arizona sycamore. The herbaceous ground cover is primarily annual grasses and forbs with a high percentage of bermuda grass.

For the most part, the lands within the study area are rocky, steep and classified as not suitable for production of commercially valuable wood products. The minor amounts of Pinyon-Juniper available for fuelwood is used by the general public for recreation purposes.

#### G. Transportation

The study segments are not accessible by paved Federal, State, or County highways. However, US Highways 89, Alt. 89, and State Highway 79, provide access to county and Forest developed roads that serve the river. See river segment location maps on pages 14 and 15.

Access to both study segments of the river is limited. The two major problems are public access through private lands and sub-standard roads. Vehicle users can be separated into two major groups. The larger group consists of the general public seeking a recreation experience, and the second group is made up of range permittees, private landowners, and utility operators.

<sup>2/</sup> Action Program for Resolution of Livestock - Riparian Conflicts on the Salt River and Verde River, July 5, 1979, US Forest Service.

1. River Segment A Access

There are five low standard dirt access roads in this segment. They are Morgan Ranch Road (FS #638), Bear Siding Road (FS #182), Verde Ranch Road (FS #635), Perkinsville Road (FS #354) and the Packard private lands access road (FS #131). These roads all pass through private lands within the study corridor. The Forest Service does not have rights-of-way or easements granting the general public access.

The Verde Ranch Road and Perkinsville Road can be driven by passenger cars. The other three roads usually require a high clearance vehicle. In addition to the listed major roads, there are several unconstructed trails and cross-country routes, that provide access to the rim above the river. Most of these require 4-wheel drive vehicles.

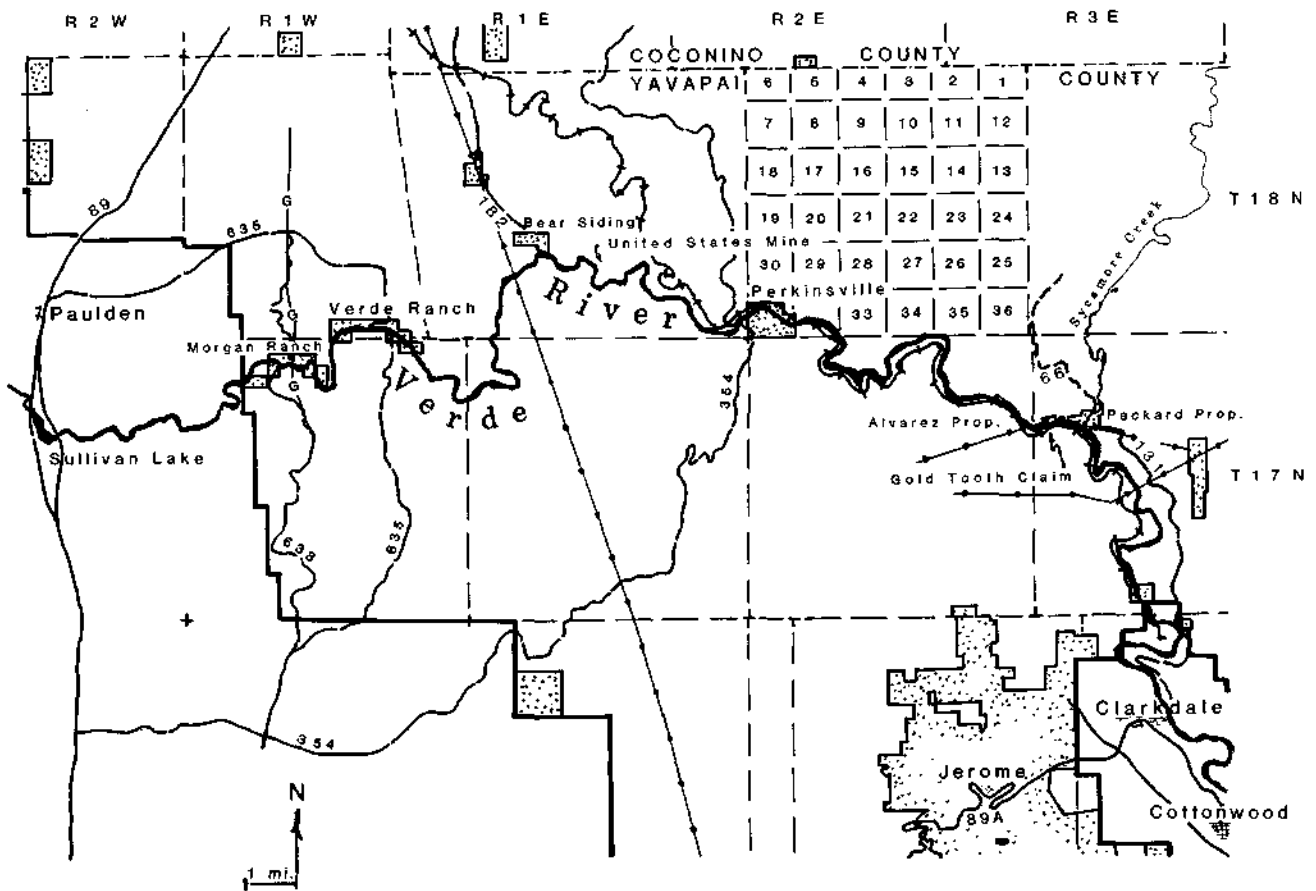
The Verde Valley Railroad enters the study corridor two miles west of Perkinsville. It remains in the corridor for 20 miles until it climbs out of the river bottom, between the Packard private lands and Clarkdale. The railroad was constructed in 1911 to connect Clarkdale with the main Ashfork-Prescott line. It does not carry passengers and generally makes one trip a day transporting cement from the Phoenix Cement Company in Clarkdale.

2. River Segment B Access

The north portion of this segment is accessible by six primitive dirt roads. They are Beasley Flats Road (FS #334), the Falls-Sycamore Creek Road (FS #500), Brown Springs Road (FS #574), Childs Access Road (FS #502), Powerline Road (FS #16), and 4-wheel Drive Road (FS #57). The roads are constructed to various standards, requiring high clearance and 4-wheel drive vehicles during wet conditions. Horseback and foot access to this section of the river is provided by Forest trails 41, 66, 67, and the powerline trail extending north from Childs.

The south section of this segment, from the junction of Fossil Creek to the boundary of the study area near Tangle Creek, is accessible by Forest Roads Nos. 269 and 479. Both roads join the river at the Sheep Bridge near the junction of Tangle Creek. Road No. 269 is constructed to the highest standard and provides primary access. Forest Trails 41, 11 and 20 provide the only other developed access to this portion of the river.

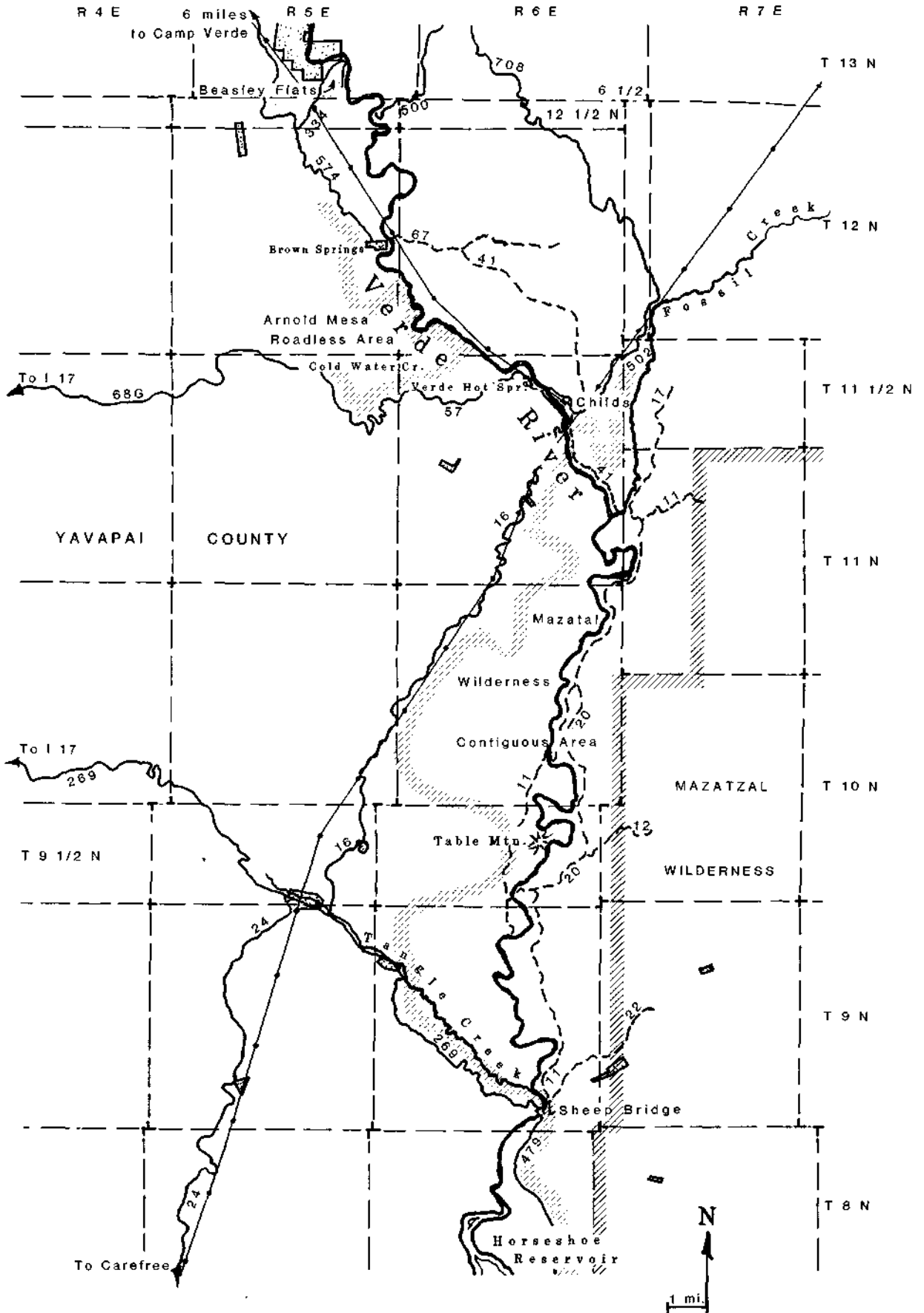
# RIVER SEGMENT A



## LEGEND

Road	
Trail	
Railroad	
Powerline	
Gasline	
Land net	
Private land	
Forest boundary	

# RIVER SEGMENT B





The Verde Valley Railroad was constructed in 1911 to connect Clarkdale with the Ashfork - Prescott Railroad and is still used today - Prescott National Forest.

## H. Recreation

Since access to most of the Verde River within the study area is limited, recreation use is lower than on some other rivers in Arizona. The absence of developed recreation sites coupled with limited access, concentrates the recreation use around areas served by the few improved roads. Most of these roads were constructed to provide access to the private land parcels located along the river. This creates conflicts between the recreation users and private landowners.

The majority of the picnicking and camping occurs in river segment A, north of Clarkdale. The alluvial flats adjacent to the river provide the water, cover, and firewood necessary for these activities.

There are several areas in both river segments that have good fishing potential. Catfish is the most sought after species but other fish, such as largemouth and smallmouth bass, bluegill, and other sunfish are also harvested. Local residents visiting their favorite fishing hole account for most of the fishing use.

In general, hunting does not occur in the study area as frequently as in the more accessible surrounding area. Upland birds and ducks are the most popular game animals.

The river segment north of Clarkdale has limited potential for extended float trips. The average flow rate is less than 200 cfs and limits floating to innertubes, rafts, and occasionally short canoe trips.

The river segment south of Camp Verde has good potential for floating during the peak March-April flow period, but is often hazardous because of rapids and tree obstacles. Documented float trips <sup>3/</sup> indicate that when the flow is below 800 cfs there is trouble with sand and gravel bars and above 3,000 cfs the river is turbulent and dangerous. The average flow rate is less than 500 cfs.

There are a few popular swimming holes within the study area. The most popular area is the Verde Hot Springs. The springs are surrounded by the remains of a twenty-room, two-story lodge and spa that operated under a Forest Service special-use permit. Although the resort building was destroyed by fire in 1962 and the special-use permit terminated, the hot springs still draw large crowds.

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<sup>3/</sup> W. G. Weinel, U.S. Forest Service, 1973 and 1975.



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Fishing along the Verde River west of Perkinsville private lands -  
Prescott National Forest



The recent RARE II 4/ process identified five roadless areas that extend into the study area. The Muldoon, Hackberry, and Sycamore Canyon Wilderness contiguous areas were recommended for resource management other than wilderness. The Arnold Mesa and Mazatzal Wilderness contiguous areas were recommended for further planning and will remain essentially undeveloped until Forest Land and Resource Management Plans 5/ are completed.

The Arnold Mesa roadless area begins approximately .5 miles south of Brown Springs below Camp Verde and extends 4 miles down river to the vicinity of Cold Water Creek. It is located entirely on the west side of the river. The Mazatzal Wilderness contiguous area begins approximately .5 miles south of Childs and includes both sides of the river down to the junction of Tangle Creek for a distance of 20 miles. See map on page 15.

#### I. Water

The Verde River originates outside the study area in Big Chino Valley northwest of Prescott. From its origin, it flows generally south, 125 miles through State, private, and National Forest lands. The river empties into Horseshoe Reservoir and Bartlett Lake, where it is stored for use downstream in the Phoenix metropolitan area. The major tributaries are Sycamore Creek (north of Clarkdale), Oak Creek, Beaver Creek, West Clear Creek, Fossil Creek, and the East Verde River.

Water quality samples collected by the U.S. Geological Survey above and below Camp Verde do not represent a complete testing program. However, they do indicate the water inside the study area meets the standards set by the State of Arizona for recreation, wildlife, fisheries and agricultural uses. 6/

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4/ The Roadless Area Review and Evaluation process (RARE II) is a comprehensive process, instituted in June 1977, by the Forest Service to identify roadless areas and undeveloped land areas in the National Forest System and to determine their general uses for both wilderness and other resource management and development.

5/ Forest Management Plan required by Section 6 of the National Forest Management Act of 1976 (P.L. 94-588).

6/ U.S. Geological Survey Water-Data Reports.



Spring river running of the Verde River at 4,000 cubic feet per second -  
Tonto National Forest

The U.S. Geological Survey maintains four gauging stations on the Verde River. The maximum, minimum, and average discharges are as follows:

TABLE 1

<u>Station</u>	<u>Years</u>	<u>Maximum</u> <u>(cfs)*</u>	<u>Minimum</u> <u>(cfs)*</u>	<u>Average</u> <u>(cfs)*</u>
Paulden	1963 to Present	8,080	15	35.7
Clarkdale	1915 to 1921 & 1965 to Present	50,600	55	187
Below Camp Verde	1971 to Present	41,000	13	378
Tangle Creek	1945 to Present	91,400	61	489

\* (cfs) - cubic feet per second.

The maximum flows usually occur during spring and winter months. The minimum flows are recorded during dry summer months.

There are no diversions, dams or other waterway modifications in river segment B. However segment A, north of Clarkdale contains three sets of diversions. The uppermost of the diversions lies in Section 31, T18N, R2E (Perkinsville private lands). The structure consists of a windrow of rock and earth extending into the stream channel, forcing water into the irrigation system by gravity flow. The second diversion is similar in construction to the first and is located in Section 12, T12N, R2E (Alvarez private lands). It provides water for agricultural purposes and serves a pasture permitted by a special-use permit on National Forest lands. The third diversion is located in T17N, R3E, Section 33, just inside the study area. The water, which is used for irrigation, is diverted out of the river into a ditch which leads to a private land parcel. These diversions do not affect the free-flowing character of the river.

That portion of the river not designated for study between Clarkdale and Camp Verde (Verde Valley) contains, or is subject to, numerous agricultural and domestic diversions. Water is drawn from the river by direct diversion and wells. It is partially consumed in agriculture and domestic use, yet a

portion of what is diverted is also returned to the river but is delayed, by routing through irrigation systems.

The water rights on the Verde River are in the process of adjudication. Until adjudication is complete, no positive statement can be made about water rights. See Appendices C and D.

Northern Arizona communities, including Prescott, Pine, Payson, and Camp Verde and other Verde Valley communities have been tentatively granted a share of Colorado River water when the Central Arizona Water Project (CAP) is completed into Arizona. Salt River Project (SRP) currently claims all unappropriated Verde River water. Some of these communities have expressed an interest in exchanging their CAP allocation to SRP for Verde River water. This could result in water being removed directly from the Verde River or its tributaries. However, since the CAP project will not be completed until approximately 1987, it is impossible to determine what affect this exchange of water rights will have on the river.

#### J. Fish and Wildlife

The riparian community and the river itself provide niches for over 60 percent of the vertebrates that inhabit the three National Forests involved in this study. For example, 255 of the 383 vertebrates known to exist on the Prescott National Forest can be found along the river and its immediate environs. Many of these animals reproduce and complete their entire life cycles in the same community. Others use the river for reproduction and/or feeding, but seasonally. Still others use the unique riparian zone as a highway for travel from summer to winter areas and return.

The river provides valuable winter waterfowl habitat. The low elevation promotes ice-free conditions which encourage use by migratory birds during January and February. Also, the year-round climate is such that a few waterfowl take up yearlong residence.

Little is known about the furbearer population. The species known to occur throughout the river influence zone are beaver, coyote, bobcat, weasel, skunk, and raccoon. River otters, listed by the State as endangered, are native to the system, but have disappeared. The Arizona Game & Fish Department is currently considering the feasibility of re-establishing the otter in the study area.

The primary game species inhabiting the area, but are not dependent on the riparian habitat, are mule deer, white-tail deer, javelina, morning dove, quail, and cottontail rabbits. Occasionally, a mountain lion or black bear will be observed passing through the area.

The water quality for river segment A north of Clarkdale rates high. A limited sample, taken near the Packard Place by Forest Service personnel in 1974, indicated that dissolved oxygen was at or close to saturation and water temperatures were well within the range to sustain a warm water fisheries. Dissolved solids, a good indicator of pollution, was well within the range necessary for supporting a good mixed fish population. Bottom fauna collected during the study also indicated good water quality.

River segment B south of Camp Verde is expected to be somewhat lower in quality than segment A, due to urban development. The towns of Clarkdale, Cottonwood, and Camp Verde are situated on the banks of the river and are suspected of contributing pollutants into the system. The extent of the pollution problem is not known at this time. However, a special task force has been assigned by the Northern Arizona Council of Governments (NACOG) under the 208 Water Quality Program to study and propose solutions to existing and projected future quality problems.

There are 25 species of fish known or suspected to occur in the study area. Of these, 14 species are big enough to be caught on a hook and line. The most popular game fish are catfish, bass, bluegill and other sunfish. Suckers and carp are sought by some people but usually are caught incidental to fishing for other species.

The entire Verde River and one-quarter mile on both sides has been identified 7/ as essential habitat for bald eagles. The bald eagle is listed as an endangered species on both the State and Federal lists. Bald eagles nesting north of Arizona use the river for wintering, and a local population of bald eagles use it for nesting and rearing young during the spring and summer.

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7/ Action Program for Resolution of Livestock - Riparian Conflicts on the Salt River and Verde River, July 5, 1979, US Forest Service.



The Verde River provides nesting sites and foraging areas for the bald eagle.

There are only 13 known active nesting territories in Arizona and New Mexico. The nesting birds tend to require the river environs more than the wintering birds. Observations and studies indicate the southern segment of the Verde River is used for nesting, and the total length is used for winter foraging. During the winter period, the eagles have been observed as far as eight miles from the river canyon.

Many wildlife observers are of the opinion that regeneration of cottonwood and other riparian hardwood trees along the Verde River essentially ceased with the advent of unrestricted cattle grazing about a century ago. The existing trees are nearing the end of their natural life span and attrition by death, floods, etc., is occurring at an alarming rate. This situation concerns many wildlife managers and observers who feel that the bald eagles prefer trees to cliff sites for nesting. The same managers and observers are quick to point out that cliff sites are unsuitable alternatives to trees because of reduced fledgling survival. Trees are also important as streamside foraging perches for capture of fish, the primary food source for the eagles.

The Forest Service has been aware of the importance of the riparian habitat along the Verde and other rivers for some time. However, only in comparatively recent times has the probable adverse effect on the bald eagle been of concern. In 1978, the Maricopa Audubon Society contacted the Forest Service and expressed their concern that the eagle habitat was not being adequately protected and managed. As a result, the Forest Service developed a position statement and proposed to proceed with a short-range program of direct habitat improvement in areas crucial to the nesting pairs accompanied by a longer term program of range management designed to improve the entire riparian resource on the Verde River. The short-range program consists of excluding livestock in selected areas, fencing of key areas and planting cottonwood cuttings. The Audubon Society has endorsed both the short and long-range programs.

In addition to the bald eagle and river otter, the Verde River and its immediate environs provide suitable habitat for 16 other threatened, endangered or special interest 8/ wildlife and fish species. See species list in Appendix A.

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8/ Special interest includes wildlife species listed by the State of Arizona that are in danger of being eliminated, may be in jeopardy in the near future, or because of limited distribution within the State.



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The Verde River is an important source of water for livestock.



#### K. Range

Since the introduction of grazing, the Verde River has served as a primary watering and foraging source. As a result, the River and the adjacent bench lands have been areas of livestock concentration. This use, coupled with the physical nature of the river corridor (climatic and edaphic), has somewhat changed the ecology of the area.

Parts of 18 National Forest grazing allotments occur within the study area. Administration limitations, resulting from financial and/or personnel constraints, have produced management variations between the allotments. The overall net result is that the grazing resource is not being managed to its potential; thus adversely impacting other resources, uses, and activities.

Range improvements consist of allotment boundary and pasture division fences, water gaps <sup>9/</sup>, corrals, tractor constructed cattle trails, and salt grounds. A range headquarters is maintained on National Forest lands north of Childs. These improvements are permitted by a special-use permit and consist of a bunkhouse, barn, and corral. They are used in management of the Skeleton Ridge grazing allotment.

Along river segment A, north of Clarkdale, there are 17 water gaps located on both Forest and private lands. They are seldom all in place at the same time and present a minor hazard to river runners.

The Forest Service is currently implementing a program to resolve an apparent conflict between livestock grazing and the riparian habitat along the Verde River. The alternatives range from complete removal of livestock to partial exclusion of grazing by fencing key areas and scheduled utilization under an approved management plan.

#### L. Minerals

Most of the Federal lands located in the study corridor between Mormon Pocket (Sec. 3, T17N, R2E) and the junction of Tangle Creek are withdrawn from mineral entry by Reclamation Withdrawals. There are no known mineral production sites within the river section between Mormon Pocket and the west Prescott National Forest boundary, which is open to mineral entry.

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<sup>9/</sup> Fences across the river that break away during periods of high water flows.

Prospecting has shown a very limited amount of base metals within or adjacent to the study area. Numerous non-metallic discoveries have been made within three miles of the river; however, only one quarry is located inside the study area and it is presently inactive.

The area from Camp Verde to Bear Siding forms the southern boundary of lands determined as prospectively valuable for oil and gas. The rest of the study area is not considered valuable for oil and gas.

Verde Hot Springs currently produces surface hot water, and U.S. Geological Survey reports show that water as hot as 120°C could exist at depths of 6,000 feet. These reports indicate the Verde Hot Springs area has very little potential for electrical power generation, but the area has potential for direct use of the geothermal resource. 10/

#### M. Air Quality

The air quality over the Verde River is good 11/. The largest single pollutant in the general area is dust which is largely the result of wind erosion from relatively undisturbed areas and vehicular travel along the low standard dirt roads.

The large metropolitan area of Phoenix, Arizona, is located approximately 40 miles south and west of the extreme south end of the study corridor. The prevailing southwest winds bring some smog into the general vicinity of the river. However, seldom can it be visually detected within the study area.

Future expansion of mining activities in the Jerome area would increase the probability of contaminants reaching the study area. Also, improvement of the unpaved roads adjacent to the river may result in increased traffic and related dust.

#### N. Landownership, Restrictions, and Uses

The Verde River flows through Yavapai and Gila Counties. All the private lands within the study area are located in Yavapai County.

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10/ State of Arizona, Bureau of Geology and Mineral Technology.

11/ Arizona Department of Health Services, 1978.

TABLE 1a

## SUMMARY OF OWNERSHIP, RESTRICTIONS, AND USES

River Segment A

1.	Length of Segment	38.5 miles
2.	Gross Acres in Study Area	12,320 acres
	Acres Under Forest Service Administration	10,846 acres
	Acres in Private Ownership	1,474 acres
3.	Number of Privately Owned Parcels <u>1/</u>	94
4.	Number of Private Landowners	11
5.	Land Uses in Study Area	
	Gas Pipeline <u>2/</u>	1 crossing
	Railroad <u>2/</u>	20 miles
	Power Transmission Lines <u>2/</u>	4
	Water Diversions <u>2/</u>	3
	Special Use Pastures <u>2/</u>	2
	Storage Yard <u>2/</u>	1
	Water Gauging Stations <u>3/</u>	2
	Reclamation Withdrawal <u>4/</u>	1
	Water Gaps (Fences) <u>2/</u>	17

River Segment B 5/

1.	Length of Segment	50.0 miles
2.	Gross Acres in Study Area	16,000 acres
	Acres Under National Forest Administration	15,974 acres
	Acres in Private Ownership	26 acres
3.	Number of Privately Owned Parcels	1
4.	Number of Private Landowners	1
5.	Land Uses in Study Area	
	Power Transmission Lines <u>2/</u>	3
	Range Headquarters <u>2/</u>	1
	Water Gauging Station <u>6/</u>	1
	Reclamation Withdrawal	Total Length
	Childs Power Plant <u>7/</u>	1

1/ These parcels vary in size from a large 446 acre tract down to small lots.

2/ Authorized by special use permit or easement.

3/ Both gauging stations have access roads.

4/ The east 1/2 of T17N, R2E and the west 1/2 of T17N, R3E have been withdrawn for waterpower development purposes.

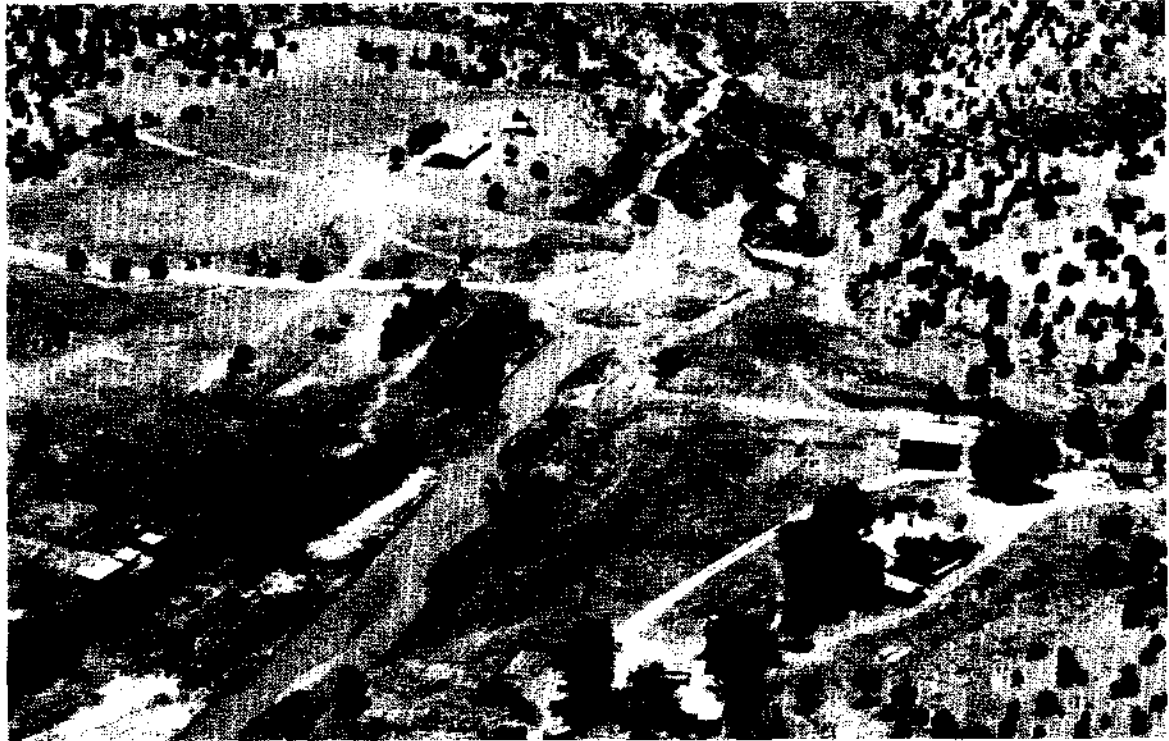
5/ Includes 10.5 mile river section between Sheep Bridge and Table Mtn.

6/ This water gauging station is maintained by helicopter.

7/ The powerhouse and appurtenant facilities are located within the study area. The water is diverted out of Fossil Creek, a tributary of the Verde River. No water is diverted out of the Verde River for power production.



Verde Valley Railroad crosses the Verde River on the east side of Perkinsville private lands - Prescott National Forest.



Ranch headquarters located in study segment A of the Verde River - Prescott National Forest

### III. EVALUATION CRITERIA

#### A. Eligibility Criteria and Analysis and Determination

The first step in the study process is to determine if the river is eligible for inclusion in the National Wild and Scenic Rivers System. In order to make this determination it is necessary to understand Section 1(b) of the Wild and Scenic Rivers Act (Public Law 90-542) which states that:

"It is hereby declared to be the policy of the United States that selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations."

To evaluate whether the river is outstandingly remarkable, eligibility criteria were written to reflect the intent of the Wild and Scenic Rivers Act as it applies to streams in Arizona below the Mogollon Rim, an area which includes the Salt, San Francisco, and Verde Rivers. These criteria are definitions of the terms "outstandingly remarkable" scenic, recreational, geologic, fish and wildlife, and historic and cultural values.

Because this evaluation can be highly subjective, the evaluation criteria were reviewed and modified at a public workshop. The accepted criteria are as follows:

##### 1. Scenic Value:

Landform - terrain highly varied and distinctive, may include vistas with sharp peaks and/or sharply serrated ridges or isolated peaks with distinctive color contrasts, deep canyons or distinctive gorges with vertical or near vertical walls and/or unusual configuration or color.

Vegetation - highly varied distinctive with strongly defined patterns formed by combinations of vegetative communities, dramatic displays of seasonal color; specimen stands of vegetation which may create unusual forms, colors or textures. Outstanding examples of threatened and endangered plants or native riparian habitat are present.

Water - Natural waterforms consist of rivers and streams of a perennial nature (consistent flow), river or stream

character varies from still pools or slow moving water to waterfalls, cascades and rapids and may have unusual channel configuration.

2. Recreational Value: Variety of uses is high or numerous; river is accessible to wide variety users, quality of recreation is high and use is commensurate with values; significance of the recreational opportunity extends at least statewide and may be regional or national.
3. Geologic Value: Formations and structures carved by wind and water erosion are unusual and worthy of study and observation, they are unusually old or show many periods and variety or unusual geological features, e.g., fossils, faults, etc., and either rocks are rare or uncommon, or exposed minerals are unusual or distinctive, or outcrops are colorful and of different forms or shapes.
4. Fish and Wildlife Values: Fish populations are self-sustaining and abundant, distinctive or highly visible; threatened and/or endangered species are self-supporting, isolated species are found away from their main geographic ranges, wildlife and fish communities show unique associations, symbiosis, competition or unusual food chains, abundance and/or variety of wildlife and/or fish is unusual for the area.
5. Historic and Cultural Values: Sites are easily viewed or interpreted, are geographically important; show distinct characteristics of time period, construction or workmanship, are associated with significant events in the nation's, state or local history or pre-history.

In addition to the eligibility criteria written in response to the Wild and Scenic Rivers Act, there are four criteria contained in the "Guidelines for Evaluating Wild, Scenic and Recreational River Areas---" written by the U.S. Department of Agriculture and the Interior in 1970. They are:

1. Free-Flowing River: The river must be in a free-flowing, natural condition.
2. Meaningful Experience Opportunity: The river must be long enough to provide a meaningful experience for river users.
3. Water Volume: The river should contain sufficient water volume to permit, during the recreation season, full enjoyment of water-related outdoor recreation activities generally associated with comparable rivers.

4. Water Quality: Water quality should meet the criteria for fish, other aquatic life, and wildlife as defined in the chapter on Aesthetics - General Criteria of Water Quality Criteria, Federal Water Pollution Control Administration, April 1, 1968.

The study team, when applying the first five eligibility criteria definitions, considered that if one or more elements of each criteria definition applied, the river then had outstandingly remarkable attributes for that particular criteria. The application of these criteria to the study segments of the Verde River led to the determination that the two segments are eligible for inclusion in the National Wild and Scenic Rivers System. The two segments meet three of the eligibility criteria for "outstandingly remarkable" values and also meets the four additional criteria. Table 2 is an analysis of the criteria as they apply to the Verde River Study Segments.

TABLE 2  
SUMMARY OF CRITERIA SATISFACTION

<u>Criteria</u>	<u>Criteria Satisfied</u>
Scenic Value	Yes
Recreational Value	No
Geologic Value	No
Fish and Wildlife Values	Yes
Historic and Cultural Values	Yes
Free-flowing River	Yes
Meaningful Experience Opportunity	Yes
Water Volume	Yes
Water Quality	Yes

Scenic Value: The Verde River does possess "outstandingly remarkable" scenic values. Evaluation of scenic qualities using the Forest Service Visual Management System <sup>1/</sup> concluded that both segments of the river and visual surroundings classified as Variety Class A. This means the scenic qualities of landform, vegetation, and waterform within the study area are extremely high, with great variety and distinction. This free-flowing perennial stream provides a unique situation in the typical southwestern landscape.

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<sup>1/</sup> The Visual Management System contains the management direction and techniques for the protection and enhancement of visual characteristics. Documents are available for review at the Prescott, Coconino, and Tonto National Forests supervisors' offices.

Recreational Value: Although the Verde River provides an excellent opportunity for diverse recreation use and many people feel it does provide a quality recreation experience, it does not meet the "outstandingly remarkable" recreational value criteria. The recreational opportunities are many, however, none are considered outstanding or unique. The current use is not high, and at the present time, the majority of the river is not readily accessible to a variety of users.

Geologic Value: Although the geology of the river does contribute significantly to the outstanding scenery of the Verde River and presents an interesting geologic display, it is not considered "outstandingly remarkable." The geologic characteristics are quite common to the area and do not display unique or unusual geologic features or provide evidence of geologic processes which are unique or unusual in character.

Fish and Wildlife Values: "Outstandingly remarkable" fish and wildlife values result because of the high quality habitat for threatened and endangered species and the variety of resident and visitor wildlife species. The presence or suspected presence of 21 threatened, endangered or special interest wildlife species is sufficient to support the unique status of the study corridor. The entire Verde River has been identified as essential habitat for the bald eagle, an endangered species. The lower river segment, south of Camp Verde, is currently recognized as critical nesting territory.

Historic and Cultural Values: Only limited surveys have been conducted along the Verde River, however, information gained from the recorded sites shows the area to contain "outstandingly remarkable" historic and cultural values. Many of the sites are considered to be geographically significant and also represent an important era in the development of the Southwest. Further investigation is expected to produce many sites of National Register significance which will probably give insight into changing land use strategies and their relationship to changing social organization through time.

Free-Flowing River: The minor existing diversions and associated impoundments within the study area do not affect the free-flowing character of the River.

Meaningful Experience Opportunity: The study segment provides a variety of meaningful experiences as identified in the discussions of scenery, recreation, and fish and wildlife.

Water Volume: The average annual flow varies from 35.7 cubic feet per second (cfs) near Paulden to 489 cfs near Tangle Creek. The lowest recorded flows range from 15 cfs near Paulden to 61 cfs at Tangle Creek. Although there is a significant drop in



flow during the driest periods, the flow is considered sufficient to permit full enjoyment of water-related outdoor recreation activities.

Water Quality: Water quality data collected by the U.S. Geological Survey indicate the waters inside the study area meet the standards set by the State of Arizona for aquatic and wildlife habitat and full body contact recreation use.

B. Classification Criteria and Determination

The Wild and Scenic Rivers Act provides three classes of rivers in the National System and defines them as follows:

1. Wild river areas: Those rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and waters unpolluted. These represent vestiges of primitive America.
2. Scenic river areas: Those rivers or sections of rivers that are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads.
3. Recreational river areas: Those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past.

These are the criteria by which the study segments of the Verde River were judged. The following analysis indicates how classification for each section of the river was determined.

1. Segment A - This segment of the river contains three water diversions, a gas line crossing, three powerline crossings, 17 water gaps with associated range fences, 20 miles of railroad tracks, two stream gauging stations, and seven parcels of private land. The private lands have been developed as follows:

Morgan Ranch: Undeveloped except for minor livestock handling facilities.

Verde Ranch, Ranch headquarters and livestock handling facilities. A portion of this private land section has been subdivided into more than 75 residential lots. The lots currently remain under one ownership.

Bear Siding: Undeveloped, used for dispersed recreation.

Perkinsville: Ranch headquarters with livestock handling facilities, irrigated pastures and several buildings.

Alvarez Property: Year-round residence and is used for farming and raising livestock.

Gold Tooth Claim: Subdivided into four parcels with one dwelling under construction and one cabin in place.

Packard Place: Non-producing property with caretaker facilities.

The river bed is accessible by five Forest [developed] roads and numerous undeveloped cross-country routes and trails. A primitive four-wheel drive road enters the study corridor near the Verde Ranch and provides access down the river to Duff Springs, a distance of approximately 5 miles. Forest Road No. 354 and the railroad cross the river by separate bridges near the Perkinsville private lands.

After evaluating the combined impacts of the shoreline improvements and numerous access routes, the study team determined that this section of the river does not meet the criteria for wild or scenic classification. However, it could be classified as recreation.

2. Segment B - This segment of the river is totally free of impoundments and diversions. It is divided into two sections based on ease of access and presence of improvements.

- a. North Section: This section extends from Beasley Flats to the junction of Fossil Creek, a distance of 22 miles. The study corridor contains two powerline crossings, ranch headquarters, one stream gauging station, and the Childs Power Generating Plant with its support facilities. A power transmission line extends up the river from the generating station for 5 miles before it leaves the study corridor.

Access is provided by six Forest [developed] roads and four trails. There are also a few four-wheel drive cross-country routes that provide access above the riverbed. The roads are not highly visible from the river and do not detract from the natural setting.

The Brown Springs private lands are located less than one-sixteenth mile from the river. Improvements consist of a modern home, guest quarters, outbuildings, hydroelectric system, and an underground irrigation system.

The study team compared the development in this section to the development in segment A and determined that a more primitive situation existed. The presence of access roads, the Childs Power Plant, and the Brown Springs Ranch preclude wild classification but do not prevent classification of the section as scenic.

- b. South Section: This river section extends south from the junction of Fossil Creek to the Sheep Bridge near Tangle Creek Junction, a distance of 28 miles. It is completely undeveloped and accessible only by foot and horseback. Forest Roads Nos. 269 and 479 provide access to the trail head located near the Sheep Bridge. The study team made the determination that this section of the river meets the criteria for wild classification.

#### C. Criteria for Evaluating Alternatives

These criteria are used to select a preferred alternative for future management of the study segment of the Verde River. They were identified from legislation, regulations, and public and management input relating to this Wild and Scenic Rivers Study.

1. Preserve free-flowing conditions and outstandingly remarkable characteristics of the river and its immediate environment.

Source: Wild and Scenic Rivers Act, Section 1(b).

Comment: The Act identified a national policy of river preservation that is intended to complement a national policy of river development.

2. Conform to availability and suitability of those lands involved.

Source: National Forest System Land and Resource Management Planning Regulations.

Comment: Lands must not only be available for particular resource management, but must also be well suited, i.e., the intended management activities must be appropriate to apply, without unacceptable adverse environmental effects.

3. Minimize impacts on private land rights.

Source: Public meetings.

Comment: This concern was expressed with particular reference to the incidence of trespass and vandalism on private lands. Also, private landowners indicated a concern regarding possible loss of their ownership rights through the scenic easement process. 2/

4. Display a high degree of compatibility with the desire and recommendations of State and local governments.

Source: Wild and Scenic Rivers Act, Section 5c.

Comment: Local governments bear a large portion of the effects, both positive and negative, of Federal designation and management, therefore their input should receive special consideration.

5. Increase the supply of outdoor recreation opportunities and services through Forest Service programs that emphasize dispersed recreation.

Source: A Recommended Renewable Resources Program, Final Environmental Statement, 1976.

Comment: After evaluating five alternative goals for Forest Service outdoor recreation program, this one was selected.

6. Provide a mix of goods and services responsive to local area economic growth.

Source: Special local problem from local open houses.

Comment: The growth of local population due to energy development will cause higher demands on Forest goods and services.

7. Ensure protection and enhancement of habitat for threatened and endangered wildlife species.

Source: Forest Service Resource Managers.

Comment: By law and through mutual agreement with the Audubon Society, the Forest Service will take necessary measures to protect and enhance riverine habitat for threatened and endangered wildlife species.

2/ Under the terms of the Wild and Scenic Rivers Act of 1968, the Secretary of Agriculture is "authorized to acquire lands and interest in lands within the authorized boundaries of any component of the National Wild and Scenic Rivers System..." The options available for acquiring such interest in private lands are to purchase on a willing buyer-seller basis or purchase of development rights through a scenic easement. In either case, an appraised value will have to be established with negotiations being based upon this value.

#### IV. ALTERNATIVES CONSIDERED

##### A. Alternative Formulation Process

Because decisions made in this study affect water development and uses and other related land uses, the Water Resources Council's Principles and Standards for Planning Water and Related Land Resources were considered in the formulation and evaluation of alternatives. See page 49.

In brief, the Principles and Standards require formulation of plans serving co-equal national objectives of National Economic Development (NED) and Environmental Quality (EQ). Once established, the alternatives are analyzed and their effects are displayed in an accounting matrix that considers regional economics and social well-being, as well as environmental quality and national economics.

A no action alternative is also formulated to provide a baseline for comparison of effects of all alternatives. No action does not mean that planned management is absent; to the contrary, it is the deliberate continuation of the current management and existing plans into the future. Under no action, the river would not be designated as a wild and scenic river component since that would be a departure from the current management. Similarly, no major investments for economic benefit would be made unless they are currently planned.

Two conditions underlie the formulation of a NED alternative. First, there must be a need for economically measurable goods and services of a resource and, second, the planning agencies must be able to implement actions that satisfy the needs.

The affected environment section of this statement describes the social and economic character of the region that includes the study segments of the Verde River. Retirement, farming, ranching, and tourism are the mainstays of the local economy. The national economy, as characterized by a NED alternative, could be enhanced by increased or more efficient production of several commodities. Minerals, livestock grazing, water for irrigation, or hydroelectric power, and recreation at developed sites could all be considered as logical components of a NED alternative.

The current management direction aimed toward protection of riparian and bald eagle habitat, as well as the need to maintain grazing within the capacity of the range, indicates that increases in livestock grazing are not possible. While there is some mineral exploration and extraction activity in the region, there is none going on in the study area nor has there been any indications of deposits of economic value. Developed

recreation needs are increasing, but topography, restricted access and lack of suitable sites precludes large scale developments adjacent to the river.

Although several potential water development projects have been considered by various entities, none have economic or other characteristics favorable enough for firm project proposal at this time. The Cliff Dam site, currently being considered by Central Arizona Water Control Study (CAWCS), is located outside the river study area. See Appendices C and D.

From this analysis, the study team concluded that no viable NED alternative exists. The no-action alternative serves the NED objective best by keeping development options open.

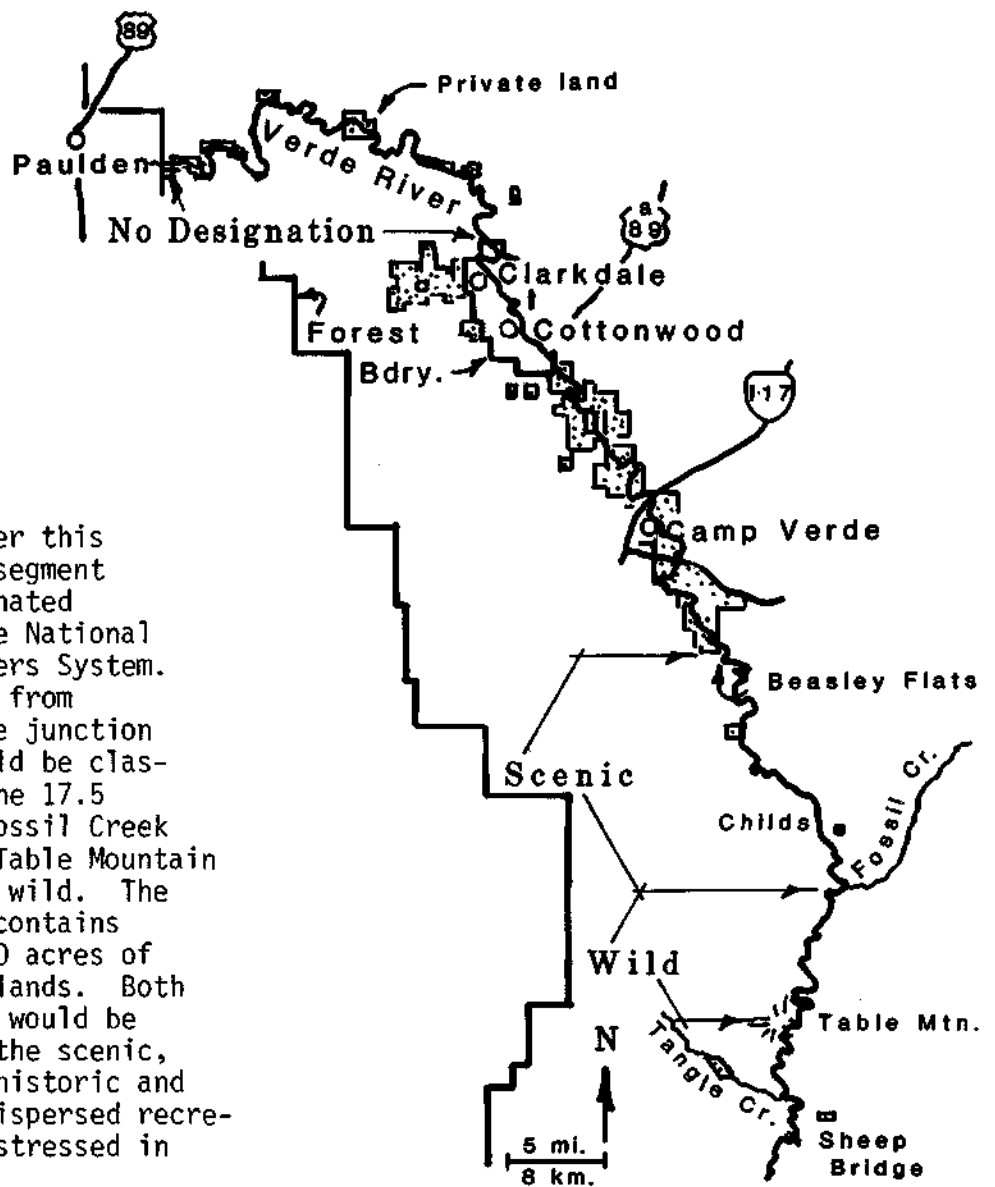
Several Environmental Quality alternatives are possible. They present different degrees of protection of the free-flowing nature of the study segments of the Verde River and protection and enhancement of the outstandingly remarkable scenic, fish and wildlife, historic and cultural values.

#### B. Alternative Descriptions

ALTERNATIVE A - Alternative A is a continuation of present management. The river, its immediate environs, and current land uses would remain essentially unchanged. This alternative includes obtaining legal public access through private lands to the river or construction of short sections of road when easements and rights-of-way cannot be obtained on a willing buyer-seller basis.

Under this alternative, future management of the National Forest lands would be directed and controlled under National Forest Land and Resource Management Plans scheduled for completion in 1982 and environmental assessments of individual proposals. Management decisions would rest with the responsible Forest Supervisors and District Rangers in accordance with current delegated authority.

This alternative would allow development along the river and would place minimal constraints on existing uses and activities, including the planned cattle enclosures for protection of the riparian habitat. The existing power project withdrawals would remain in effect. The temporary mineral withdrawal imposed by the Wild and Scenic Rivers Act would be lifted.



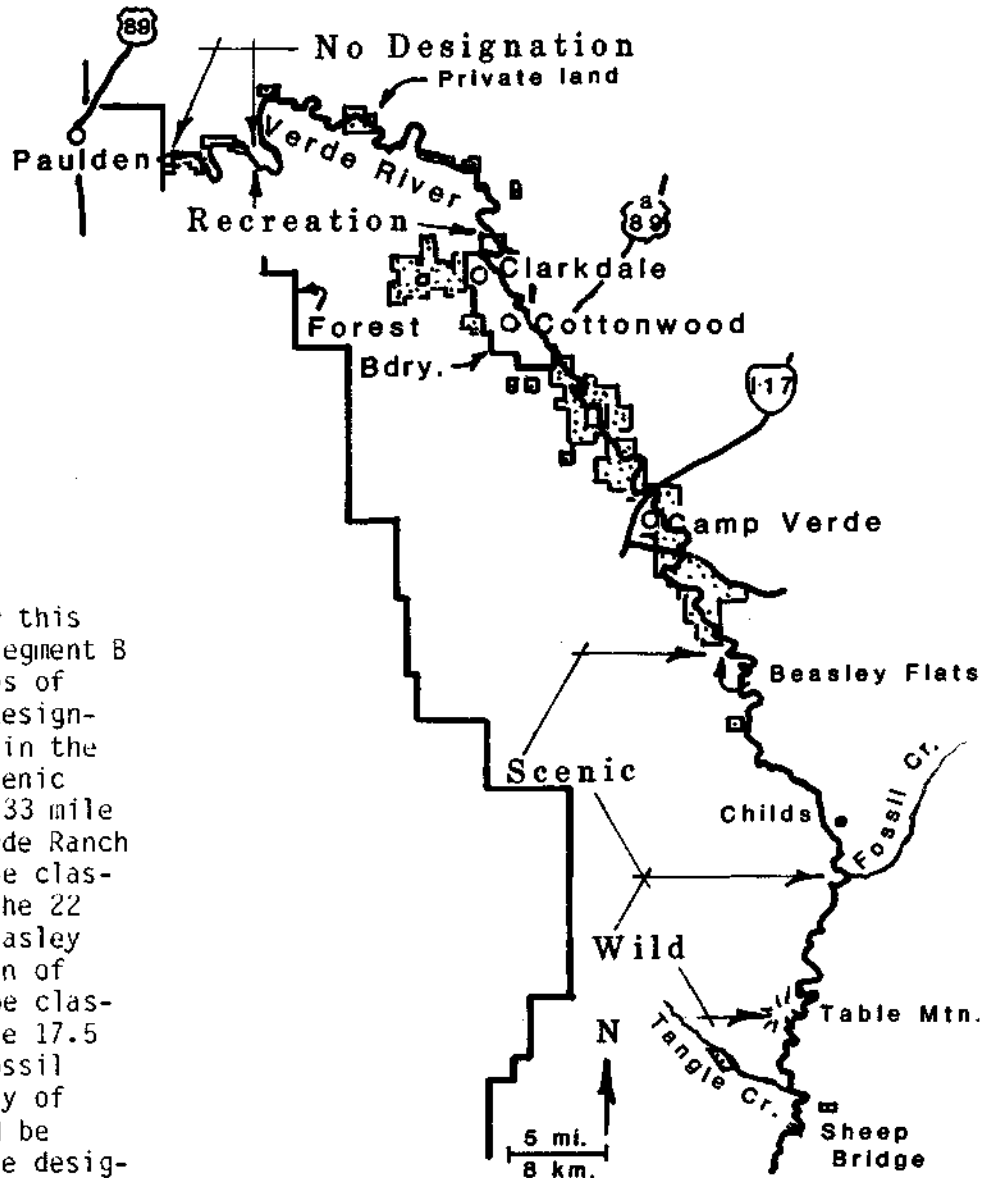
**ALTERNATIVE B** - Under this alternative, river segment B 1/ would be designated for inclusion in the National Wild and Scenic Rivers System. The 22 mile section from Beasley Flats to the junction of Fossil Creek would be classified scenic and the 17.5 mile section from Fossil Creek to the vicinity of Table Mountain would be classified wild. The designated segment contains approximately 12,640 acres of public and private lands. Both classified sections would be managed to enhance the scenic, fish and wildlife, historic and cultural values. Dispersed recreation use would be stressed in management.

River segment A would not be designated under this alternative. Management of this 38.5 mile river segment between the Forest boundary and Clarkdale would be the same as described in Alternative A.

Designation may impose some constraints on the private land parcel located near Brown Springs. The intent is not to change the present private land use, but to prevent future developments that would detract from the values for which the river was designated and classified. The management plan will evaluate the need for scenic easements or county zoning which are desirable but not essential.

Should the river be designated, a detailed study would be made to determine access needs. Roads and trails would be improved or closed as necessary. Also, sanitary and parking facilities would be needed at primary access points.

1/ The 10.5 mile river section between Table Mountain and Tangle Creek was excluded from the study during the analysis and evaluation process (See C. Alternatives Eliminated From Further Consideration, page 44.) The term "study segment B" from this point forward includes only the river section between Beasley Flats and Table Mountain.

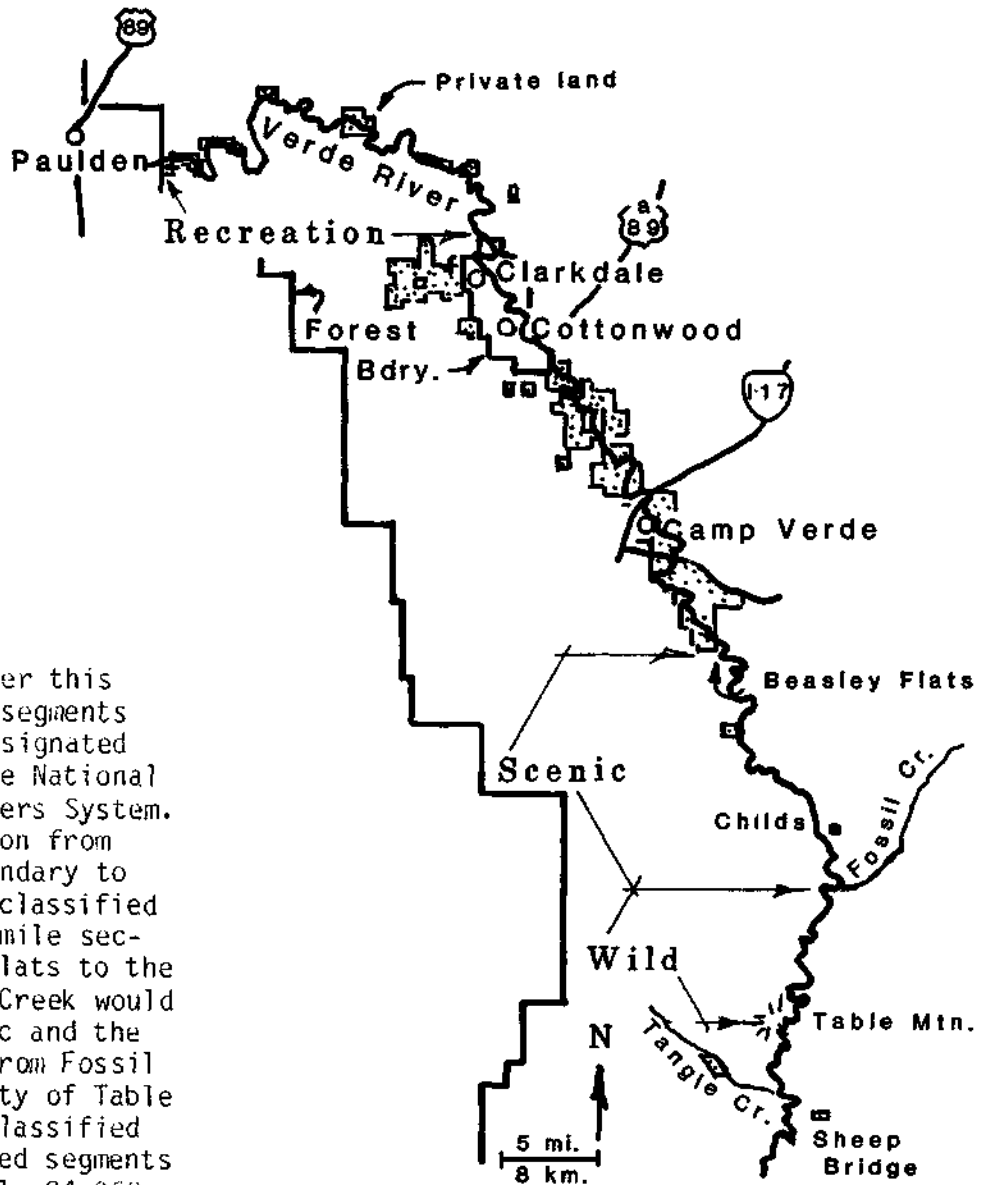


ALTERNATIVE C - Under this alternative, river segment B and all but 5.5 miles of segment A would be designated for inclusion in the National Wild and Scenic Rivers System. The 33 mile section from the Verde Ranch to Clarkdale would be classified recreation, the 22 mile section from Beasley Flats to the junction of Fossil Creek would be classified scenic and the 17.5 mile section from Fossil Creek to the vicinity of Table Mountain would be classified wild. The designated segments contain approximately 23,210 acres of public and private lands. The classified sections would be managed to enhance the scenic, fish and wildlife, historic and cultural values. Dispersed recreation use would be stressed in management.

The 5.5 mile river section between the west Forest boundary and the Verde Ranch would not be designated under this alternative. Management of this section would be the same as described in Alternative A.

There are 737 acres of private lands located along the designated river segments. Designation would impose some constraints on future development of a portion of these lands. The extent of the restrictions and number of acres actually affected would be determined in a study to be conducted if the river is designated. The study would also determine access needs including sanitation and parking facilities. Roads and trails would be improved or closed as necessary.





**ALTERNATIVE D** - Under this alternative, river segments A and B would be designated for inclusion in the National Wild and Scenic Rivers System. The 38.5 mile section from the west Forest boundary to Clarkdale would be classified recreation, the 22 mile section from Beasley Flats to the junction of Fossil Creek would be classified scenic and the 17.5 mile section from Fossil Creek to the vicinity of Table Mountain would be classified wild. The designated segments contain approximately 24,960 acres of public and private land.

This alternative is basically the same as Alternative C, with the addition of 5.5 miles of recreation classified river near the west Forest boundary. Management and development would be the same as described for Alternative C.

There are 763 acres of private lands located along the added 5.5 mile river section. This brings the total private lands that could be affected by designation under this alternative to 1,500 acres.

### C. Alternatives Eliminated From Further Consideration

In a letter dated August 29, 1979, from the Forest Supervisor, Tonto National Forest to the Projects Manager, Bureau of Reclamation (now the Water and Power Resources Service WPRS), the Forest Service indicated its intent to study the Verde River from Table Mountain downstream to Tangle Creek in conjunction with the legislated study. Response from WPRS dated December 3, 1979, indicated the Central Arizona Water Control Study (CAWCS) was reviewing viable alternatives for needed flood control or protection actions on the Verde River. During this same period, the Salt River Project was in the early stages of evaluating the installation or expansion of hydroelectric generation facilities on the river. They indicated enlargement of Horseshoe Dam was a realistic consideration for both flood control and hydroelectric generation. The proposed enlargement of Horseshoe Dam would have resulted in a maximum reservoir level between an elevation of 2,160 and 2,170 feet. This would impound the Verde River approximately eight miles above Tangle Creek.

Flooding in the Salt River Valley below the confluence of the Salt and Verde Rivers is a serious problem - a problem highlighted by the floods of the past three years. All involved agencies and the public agree that some sort of additional flood control actions are needed.

Based on information provided by WPRS, SRP and the need for some type of flood control action on the Verde River, the 10.5 mile river section between Table Mtn. and Tangle Creek was dropped from the study. The alternative that contained the 10.5 mile river section was identified as Alternative E during the initial data gathering stage. The impacts of Alternative E were not evaluated and presented to the public in the Draft Environmental Statement. However, during the analysis and evaluation process, it was determined that the river section did meet both the eligibility and classification criteria in the Wild and Scenic Rivers Act.

Since the release of the Draft Environmental Impact Statement in August, 1980, the CAWCS has published a factbook. The study has been completed through Stage II, which eliminates the raising of Horseshoe Dam as an alternative. The Cliff Dam site is currently being considered for both flood control and regulatory storage. Dam safety of Horseshoe Dam is also being considered in the study. See CAWCS summary in Appendix C.

As a result of the information provided by CAWCS, the reasons for dropping the 10.5 mile river section between Table Mountain and Tangle Creek from the study are no longer valid. However, considering that the impacts of designating the river section into the Wild and Scenic Rivers System were not evaluated in the Draft Environmental Statement and presented to the public, the river section will not be considered in the Selected Alternative section of this report.

V. EFFECTS OF IMPLEMENTATION

A. Alternative Effects

The tables in this section display specific comparisons of uses and consequences of each alternative, including costs and social and economic implications. These values for 1978 are also shown to form a basis for comparison.

TABLE 3  
COMPARISON OF USES FOR THE ALTERNATIVES IN 1990

<u>Activity</u>	<u>1978</u>	<u>Alter. A</u>	<u>Alter. B</u>	<u>Alter. C</u>	<u>Alter. D</u>
Water Yield <u>1/</u>	354,300	354,300	354,300	354,300	354,300
Water Quality	NA	0	+	+	+
Reservoir Construction Opportunities	NA	0	-	-	-
Cattle (AUM) <u>2/</u>	1,190	1,190	1,190	1,190	1,190
Minerals <u>3/</u> Exploration	0	0	0	0	0
Development	0	0	0	-	-
Wildlife Habitat <u>4/</u>	0	0	+	+	+
Fisheries Habitat	0	0	+	+	+
Timber Production	NA	NA	NA	NA	NA
Roadless Areas	0	0	0	0	0

LEGEND

- NA Not applicable
- + Enhanced opportunities, quantity, quality
- 0 No effect, no change
- Negative effect on opportunities, quantity, quality

1/ Data taken from U.S.G.S. water gauging station located 1.3 miles south of Tangle Creek Junction (Average acre feet/year).

2/ Designation under the National Wild and Scenic Rivers Act will not effect livestock grazing capacity of the river corridor. Other management activities such as protection of bald eagle habitat could effect permitted numbers. An AUM is the equivalent of one cow and calf grazing for 30 days.

3/ Oil, gas, hardrock, geothermal.

4/ Including riparian habitat.

TABLE 4

## CHANGES IN RECREATION USE IN 1990 BY ALTERNATIVES

	<u>Present 1/</u> <u>1978</u>	<u>Alter. A 2/</u> <u>RVD's/1990 4/</u>	<u>Alter. B 3/</u> <u>RVD's/1990</u>	<u>Alter. C 3/</u> <u>RVD's/1990</u>	<u>Alter. D 3/</u> <u>RVD's/1990</u>
Picnick- ing 5/	3,200	4,984	5,562	5,996	6,191
Camping 6/	6,000	8,440	9,683	10,047	10,376
Water- based Recreation	5,500	7,995	9,573	10,216	10,470
Dispersed Motorized Recreation	1,100	1,595	1,500	200	0
Dispersed Nonmotor Recreation	900	1,300	1,615	1,707	1,741
Hunting	2,000	2,407	2,547	2,547	2,547
Non-hunt- ing Wild- life	800	1,145	1,336	1,459	1,504
Fishing	5,700	7,705	9,732	10,101	10,236
TOTAL	25,200	35,571	41,548	42,273	43,065

1/ Recreation use for 1978 was estimated using available data collected from the Forest Service Recreation Information Management System, input from Forest Service personnel and other data collected by study team.

2/ Alternative A use increases are based on average activity increases estimated from the Forest Service Recreation Information Management System.

3/ Alternatives B, C, and D use based on Alternative A plus an anticipated increase resulting from designation and improved access.

4/ RVD is defined as a recreation visitor day (12 hours of recreation activity.)

5/ Picnicking - Picnicking is defined as picnicking in other than developed picnicking sites.

6/ Camping - Camping is defined as camping in other than developed camping sites.

Water yield would not be changed under any of the alternatives as there is no opportunity to increase water yield within the study area. Usually, an instream-flow claim for the amount of water needed for wild and scenic river purposes would be included in this report. However, it would be impossible to determine an accurate instream-flow claim with the timeframe of this study. The determination of water needs usually takes an interdisciplinary team several months, if not years, to complete. It would be inadvisable to specify any instream-flow claims in this document that are not fully defensible. Such data and the methodology used to derive it would undoubtedly set off a debate involving water rights issues.

The Verde River has a built-in safeguard against large upstream uses of water. Most of the river's water is currently being used downstream from the study area for agricultural, industrial, and domestic purposes under adjudicated water rights. Therefore, existing downstream water rights should prevent excessive diversion and loss of flow in the study segments.

The completion of the Central Arizona Project (CAP) in 1987, could have an impact on instream-flow of the river. If the communities that have been tentatively granted a share of the Colorado River water are permitted to exchange CAP water for Verde River water, it would be diverted from the study segments, thus reducing the flow. Should the exchange become a reality, an indepth study of the instream-flow needs to maintain the river values will be required under Alternatives B, C, and D.

The required minimum flow would not be evenly distributed. Flow data gathered from 1945 to present indicate that a minimum flow of 61 cfs and a maximum flow of 91,400 cfs can be expected near the Tangle Creek Junction at the extreme southern end of the study area. The past 35 year average flow is 489 cfs.

The existing water quality would be maintained or improved in all alternatives. The State of Arizona has the responsibility to set water quality standards and has designated the Verde River for "Body Contact". Under this designation, the water quality will not be degraded below its existing condition. The State however, could change or rescind the designation.

The increase in recreation use and possible construction/reconstruction of access roads, parking and sanitation facilities is expected to have an impact on water quality under Alternatives B, C, and D. Sedimentation is expected to increase slightly during periods of construction or reconstruction. However, it would decrease below the current level once the facilities are constructed and off-road vehicle travel is restricted to designated travelways. Increased recreation use at river

access points, would tend to compact soils and cause minor vegetative modifications. Periodic closing of highly used access points may be necessary for rehabilitation purposes. The net results of designation on water quality is expected to be positive.

Reservoir construction opportunities would remain unchanged under Alternative A and would be eliminated within the designated segments in Alternatives B, C, and D. There is no merchantable timber within the study area; therefore, designation would have no effect on timber harvesting. Grazing production would also remain unchanged.

Although no known economic minerals occur, the potential to utilize minerals within the study area would be reduced under Alternatives C and D. River segment B is currently withdrawn from mineral entry by existing Reclamation Withdrawals, so classification under Alternative B would have no effect. The potential for geothermal development would be reduced under Alternatives B, C, and D.

No activities to improve fisheries habitat are proposed in any of the alternatives. Increased recreation use due to obtaining legal public access and designation in the National Wild and Scenic Rivers system would perhaps increase pressure on existing fish populations but would have minimal impact on their habitat. The impact on wildlife habitat is expected to remain about the same under all alternatives. However, the opportunities to improve wildlife habitat would increase with Alternatives B, C, and D, as emphasis is given to comply with Section 10 of the Wild and Scenic Rivers Act. The projected recreation use increase could have an adverse impact on wildlife populations, making it necessary to impose administrative constraints on the public during critical periods. For example, it may be necessary to impose a closing order restricting public use on segments of the river, during the nesting period of the bald eagle to promote survival of the fledglings.

Motor vehicle use would be restricted to specified roads within designated sections of the river. Therefore, dispersed motorized recreation use would decline under Alternatives B, C, and D. Most of the current use is occurring in river segment A between the Verde Ranch and Perkinsville; therefore Alternatives C and D would have the greatest impact.

If the current recreation use trend continues, a 36 percent increase in river use can be expected under Alternative A by 1990. The combined projected user increase due to the current trend and designation would be 60 percent for Alternative B, 67 percent for Alternative C, and 71 percent for Alternative D. Designating the Verde River as a component of the National

Wild and Scenic Rivers System would have little effect on big or small game hunting. The increase in use would result primarily from picnicking, camping, water-based recreation and fishing activities. The two roadless areas designated for further planning by the RARE II process would not be affected by any of the alternatives.

B. Economic, Environmental, and Social Effects Displays

Including a river in the National Wild and Scenic Rivers System may have significant environmental, social, and economic effects. Chapter IV described use of guidelines known as the Principles and Standards for Planning and Related Land Resources (Federal Register 38;174;111, Section 19, 1973). As outlined in the Principles and Standards..., the study will include alternative plans for future management of the study area. Generally, this planning should serve two equal objectives of national economic development (NED) and environmental quality, (EQ). The effects of achieving these objectives are displayed in tables called a system of accounts, and include a national economic development account, environmental quality account, regional development account, and social well-being account.

Tables 3 and 4 provide the basic data for the system of accounts displayed in this section. The outputs of the alternatives are expressed as those obtained from the river corridor. They are based on land suitability/capability and past trends.

As previously discussed, no NED alternatives were considered because there are no firm proposals for economic development within the study segments of the Verde River. All alternatives for the river can be considered EQ alternatives although they do have some economic benefit. Because the primary objective of Alternatives B, C and D is environmental protection, and the magnitude of the economic benefits is small, these three alternatives are considered primarily EQ alternatives.

The values used in the analysis are those used in the 1980 RPA recommended program. An economic impact analysis model (developed during the RARE II process for the Coconino, Gila, and Yavapai Counties) was used to determine the impacts on each of several economic indicators for the alternatives.

NED Account. Table 5 displays the outputs by alternatives, annual costs, and the effects on the national economy expressed as annual income and person years employment. Estimated initial cost of acquiring scenic easements, construction of facilities, and planning is also displayed for comparison purposes.

EQ Account. The environmental quality account in Table 6 displays the effects of the alternatives on selected components of the environment.

Regional Development Account. A Regional development account is concerned with economic effects of a proposal on the immediate region of study. It shows the direct and indirect effects on economic activities induced by the alternatives. Table 7 displays the gross Regional product generated, Regional income generated, and Regional employment generated for each alternative.

Social Well-Being Account. Social well-being is defined as the number of choices people can make. When choice is broadened, social well-being is enhanced or improved. Social well-being is displayed for the alternatives in Table 8.



TABLE 5

ALTERNATIVE EFFECTS ON NATIONAL ECONOMIC DEVELOPMENT 1/

<u>Account Component</u>	<u>Alter. A</u>	<u>Alter. B</u>	<u>Alter. C</u>	<u>Alter. D</u>
<u>Outdoor Recreation (RVD's) <u>2/</u></u>				
Picnicking	4,984	5,562	5,596	6,191
Camping	8,440	9,683	10,047	10,376
Water-based Recreation	7,995	9,573	10,216	10,470
Dispersed Motorized	1,595	1,500	200	0
Dispersed Nonmotorized	1,300	1,615	1,707	1,741
Hunting	2,407	2,547	2,547	2,547
Wildlife-Nonhunting	1,145	1,336	1,459	1,504
Fishing	7,705	9,732	10,101	10,236
Total Annual Visitor Days	35,571	41,548	42,273	43,065
Recreation Annual Income	\$168,897	\$201,119	\$212,623	\$217,521
Recreation Annual Cost	\$9,441	\$11,080	\$11,588	\$11,845
Employment Created By Recreation (Private Sector Person Years)	24.37	29.05	30.73	31.44
<u>Domestic Livestock</u>				
Annual Output (AUM's) <u>3/</u>	1,190	1,190	1,190	1,190
Annual Costs	\$2,380	\$2,380	\$2,380	\$2,380
<u>Locatable Minerals</u>				
Acres Withdrawn <u>4/</u>	15,820	15,820	15,820	15,820
Acres Open for Entry	7,640	7,640	7,640	7,640
<u>Leasable Minerals</u>				
Acres Withdrawn	0	5,600	5,600	5,600
Acres Available	23,460	17,860	17,860	17,860
<u>Transportation System</u>				
Development Cost	62,000	118,000	370,000	370,000
Annual Maintenance Cost	\$17,480	\$31,905	\$44,100	\$44,100
<u>Recreation Facilities</u>				
Development Costs	0	102,500	225,000	225,000
Annual Maintenance	0	\$3,600	\$5,400	\$5,400
Scenic Easement Acquisition	0	<u>5/</u>	\$1,075,700	\$2,041,500
Management Plan Preparation	0	\$13,000	\$23,000	\$25,000

1/ Unless otherwise indicated, all costs are expressed in 1980 dollars and are one-time expenditures. The alternative effects are projected to the year 1990.

2/ RVD's - Recreation Visitor Days, 12-hour use period.

3/ AUM's - Animal Use Months.

4/ Acres currently withdrawn from mineral entry by Reclamation Withdrawals.

5/ See footnotes at the bottom of pages 38 and 56 for definition of Scenic Easements.

TABLE 6

## EFFECTS ON COMPONENTS OF THE EQ ACCOUNT

Components	Alternative A No Designation	Alternative B	Alternative C	Alternative D
Free-Flowing River	Option to develop water and power projects remain open.	17.5 miles protected as wild; 22 miles protected as scenic.	17.5 miles protected as wild; 22 miles protected as scenic; 33 miles protected as recreation.	17.5 miles protected as wild; 22 miles protected as scenic; 38.5 miles protected as recreation.
Maintain and Protect Bald Eagle Habitat	Loss of habitat from private land development and inundation could occur.	Habitat will be protected in segment B.	Habitat protected in all but 5.5 miles of study area.	Habitat protected in entire study corridor.
Protect and Preserve Historical Archaeological Sites	Protected by current laws.	Protection would continue under existing laws, however, National designation would attract more visitors which may result in increased damage and vandalism. Identification and protection of sites would be stressed in management plan.		
Maintain Water Quality and Quantity	Existing State and Federal law would be applicable.	Classification assures protection of water quality and quantity.		
Maintain Scenic Qualities	Natural beauty and open space on private land currently regulated by local zoning only.	Only those lands within segment B of the study area would be subject to constraints associated with the Wild and Scenic Rivers System.	A total of 72.5 miles the river would be subject to constraints associated with the Wild and Scenic Rivers System.	All the area within the study area would be subject to constraints associated with the Wild and Scenic Rivers System.
Irreversible or Irretrievable Commitment of Resources	No assurances.	No assurances in segment A. Assures long-term options for nonconsumptive uses in segment B.	Assures long-term options for non-consumptive uses in all but 5.5 miles of the study corridor.	Assures long-term options for non-consumptive uses in the study corridor.

TABLE 7

## ALTERNATIVE EFFECTS ON REGIONAL DEVELOPMENT

<u>Account Component</u>	<u>No Designation</u>			
	<u>Alter. A</u>	<u>Alter. B</u>	<u>Alter. C</u>	<u>Alter. D</u>
<u>Gross Regional Product</u>				
<u>Generated</u>				
Agriculture (livestock)	121	136	142	144
Agriculture (other)	51	60	62	72
Trade & Manufacturing	78,224	92,904	98,393	100,800
Minerals & Energy	337	401	423	442
Services (Rec. & Tourism)	100,913	119,998	126,901	129,885
All Other Economic Sectors	37,847	45,103	47,232	48,098
Total Product	\$217,493	\$258,602	\$273,153	\$279,441
<u>Regional Income Generated</u>				
Agriculture (livestock)	32	36	37	38
Agriculture (other)	16	19	20	20
Trade & Manufacturing	32,551	38,652	40,947	41,955
Minerals & Energy	53	63	64	68
Services (Rec. & Tourism)	52,463	62,488	66,103	67,635
All Other Economic Sectors	13,722	16,352	16,686	17,418
Total Income	\$98,836	\$117,610	\$123,857	\$127,134
<u>Regional Employment</u>				
<u>Generated (Person Years)</u>				
Agriculture (livestock)	.005	.006	.006	.007
Agriculture (other)	.002	.002	.003	.003
Trade & Manufacturing	4.561	5.414	5.736	5.878
Minerals & Energy	.003	.003	.004	.004
Services (Rec. & Tourism)	10.199	12.181	12.898	13.198
All Other Economic Sectors	1.55	1.848	1.93	1.965
Total Employment	16.320	19.454	20.574	21.055

TABLE 8

## SOCIAL WELL-BEING

Component Need	No Action Alternative A	Alternative B	Alternative C	Alternative D
Recreation Experience	Little change from existing status. Could be some gradual decline due to private lands limiting access to river.	Segment B would be protected in near natural condition. Improved access in segment B would encourage more recreation use.	All but 5.5 miles of study area would be retained in near natural condition. Better access would increase number of recreationists.	Full length of river would be retained in near natural condition. Better access would increase number of recreationists.
Freedom of Travel	Some improvement, however many of the current access problems would remain.	ORV travel restricted on study segment B. Improved road and trail access in segment B.	ORV travel restricted on all but 5.5 miles of study area. Improved road and trail access to both segments.	ORV travel restricted on entire study area. Improved road and trail access to both segments.
Private Ownership Rights	Private land rights constrained only by State law and county regulations.	Very limited impact on private land rights.	Moderate impact on private land rights.	This alternative would have the greatest impact on private land rights.
Tax Base	Tax base would not be affected.	Very slight decrease in tax base.	Acquisition of scenic easements could produce a much greater reduction in the tax base but less than Alternative D.	Acquisition of scenic easements could have the greatest reduction on the tax base.
Life, Health, Safety	Neutral for this component.	Neutral for this component.	Neutral for this component.	Neutral for this component.
Emergency Preparedness	Currently, 15,820 acres of the river study corridor is withdrawn from mineral entry by Reclamation Withdrawals. The remaining 7,640 acres are open to entry without restrictions.	No change from Alternative A except approximately 5,600 acres would be withdrawn from mineral leasing.	Approximately 7,160 acres of the open-to-entry lands would be subject to restrictions imposed by designation and approximately 5,600 acres would be withdrawn from mineral leasing.	Approximately 7,640 acres of the open-to-entry lands would be subject to restrictions imposed by designation and approximately 5,600 acres would be withdrawn from mineral leasing.

### C. Summary of Effects

1. Alternative A. The no action alternative would not curtail private land uses or water developments. Power and Reclamation withdrawals would remain in effect. Construction and maintenance of stream gauging stations and other water related improvements would be permitted within normal environmental constraints.

Development of private lands within the study corridor will continue under state and county guidelines. For example, a portion of the Verde Ranch Property has been subdivided into over 75 residential lots. None of the lots have been sold. However, the existence of the subdivision indicates development potential. Similar type developments on private lands could have an adverse impact on the general appearance of the landscape, water quality, and wildlife habitat.

Livestock grazing would continue within a balance of range capacity as defined and directed in current allotment management plans. Range improvements would be considered as needed to effectively manage the river corridor. Cattle enclosures necessary to protect key wildlife riparian areas and the establishment of young cottonwood trees would be constructed as planned without constraints that may be imposed by designation.

Recreation use would continue to increase at a slow to moderate rate. The increase would be in proportion to the general population trend. River use would also increase as other more desirable rivers become congested. Opportunities for future recreation developments would continue to exist.

There are no present plans for constructing new access roads; however, there is a need to resolve the current river access conflict between the using public and private landowners along the river. Obtaining road rights-of-way or construction of short road sections are both viable alternatives. Future road development would be constrained only by the necessary environmental considerations. The same would be true for utility corridors, railroad and pipeline rights-of-way along or crossing the river. Current Federal and State laws and regulations would apply to mining activities.

This alternative does not provide permanent protection of the free-flowing nature of the river. Construction of dams and other developments for irrigation and hydroelectric power would not be precluded.

2. Alternative B. Under this alternative, river segment A between the Forest boundary and Clarkdale would not be designated and segment B between Beasley Flats and Table Mountain would be designated and classified scenic and wild. The effects listed for Alternative A apply to segment A to the extent that any planned actions within the segment do not destroy the free-flowing nature of the designated portion of the river. The following effects apply to river segment B.

Designation and classification may curtail some uses and development on the included parcel of private lands. These constraints could be in the form of State, County, local zoning ordinances or scenic easements 1/ acquired by the Federal Government. Private land uses such as commercial development, erection of signs or billboards, subdivisions and permanent trailers or mobile homes could be curtailed. The private landowner would be fully compensated for loss of development rights should it be necessary to obtain a scenic easement. Present uses would not be affected without the consent of the landowner. The landowner will retain title to the land. Public access provisions would not be included in an easement for the Brown Springs property since the privately-owned lands do not extend to the river's edge. Recreationists and other river visitors would not be allowed on private lands without the owner's permission.

Following designation, a detailed study of the river's access system would be made. Existing roads and trails would be evaluated and upgraded or closed as needed to provide reasonable public access or protect the values which caused the river to be added to the National Wild and Scenic Rivers System. The need for parking and sanitation facilities would also be evaluated during the study. Off-road vehicle travel would not be permitted within the river corridor. New road construction and utility corridors would be permitted immediately adjacent to the classified river sections, if they do not detract from scenic values and meet the existing environmental constraints.

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1/ "Scenic easement" means the right to control the use of land (including the air space above such land) within the authorized boundaries of a component of the Wild and Scenic Rivers System, for the purpose of protecting the natural qualities of a designated wild, scenic, or recreational river area, but such control shall not effect, without the owner's consent, any regular use exercised prior to the acquisition of the easement. (16 U.S.C. 1286) In the case of the Verde River, the terms of the scenic easement would be negotiated with each landowner.

Improved access and designation of the river segment is anticipated to increase recreation use of the river. The majority of the additional users would come from other than local communities, providing some economical benefit to the Verde Valley. Primitive type recreation opportunities would be retained for the designated river segment.

Designation would not preclude geothermal development along the river. However, the developments must be compatible with river segment classification.

Subject to valid existing rights, the minerals in Federal lands which constitute the bed or banks of the river or are within one-quarter mile of the bank are withdrawn from all forms of appropriation under the mining laws or mineral leasing laws for the classified wild river section. Mining activities on valid claims within the scenic classified section would be subject to regulations deemed necessary by the Secretary of Agriculture for the protection of the river values.

Livestock grazing will continue to the extent it does not detract from the values for which the river was selected and designated under the provisions of the National Wild and Scenic Rivers Act. Unobtrusive fences and other range improvements would be permitted if they do not produce a significant adverse impact on the natural character of the river.

Designation would increase the opportunity to enhance the habitat value of the river for the bald eagle and other threatened and endangered wildlife species. Increased recreation use resulting from designation could reach a point where it adversely affects the nesting bald eagle and other wildlife species. Should a user-wildlife conflict result, some user restrictions would be required. The increased number of people using the river would also produce a greater wildfire risk and could have a slight adverse effect on water quality.

Designation would not affect the current operation and maintenance of existing facilities such as Childs Power Plant, gauging stations, transmission lines, fences, etc. Departures from current procedures, including access and new construction that adversely affects the natural character of the area could be prohibited.

This alternative protects the free-flowing nature and outstanding values of the river between Beasley Flats and Table Mountain. Dams and other diversion structures cannot be constructed in this segment.

3. Alternative C. This alternative designates all but 5.5 miles of river segment A and all of segment B into the National Wild and Scenic Rivers System. The effects listed for Alternative A apply to the undesignated portion of the river and the effects listed for Alternative B apply to the designated and classified river segment B. The following discussion applies to the designated portion of river segment A between the Verde Ranch and Clarkdale, which would be classified recreation.

A recreational classification for the designated portion of river segment A would curtail some uses and development on five separate parcels of private lands. The constraints could be in the form of State regulations, local government zoning ordinances, and/or scenic easements acquired by the Federal Government. Landowners would be fully compensated for any loss in the market value of their properties if it is necessary to acquire scenic easements. Present land uses would not be affected without the owner's consent. The landowner will retain title to the land. The necessary rights to assure reasonable public access to and along the river would be acquired.

A portion of the included private lands have potential for subdivision. This type of development could have an adverse impact on water quality. The river would require periodic monitoring and enforcement of State Water Quality Standards.

Following designation, a detailed study of the river's access system would be made. Existing roads and trails would be evaluated and upgraded or closed as needed to provide reasonable public access or protect the values which caused the river to be added to the National Wild and Scenic Rivers System. The need for parking and sanitation facilities would also be evaluated during the study. Off-road vehicle travel would not be permitted within the river corridor. New road construction and utility corridors would be permitted immediately adjacent to the classified river section, if they do not detract from scenic values and meet the existing environmental constraints. Trail access to the river section south of Perkinsville would be required.

There are three potential recreation development sites along the river between Perkinsville and the Verde Ranch. None of the inventoried sites are currently programmed for development.

Except for primitive type improvements, future recreation facilities (campgrounds, etc.) would be located outside the river corridor.



Mining and leasing activities on Federal lands within the boundaries of the Recreation classified river section would be subject to regulations deemed necessary by the Secretary of Agriculture for protection of the river values. Geothermal development would be affected but will not be prohibited.

The effect of designation on livestock grazing and wildlife, including the eagle, would be the same as described for river segment B under Alternative B. Grazing will be permitted and the opportunity for wildlife habitat enhancement would be increased.

The effect of designation on operation and maintenance of existing facilities would be the same as described for river segment B under Alternative B. Deviation from current methods of operation and maintenance that adversely affects the natural character of the area could be prohibited.

The designation of any part of the Verde River in the National Wild and Scenic Rivers System should increase recreation use. Wild and scenic classification of river segment B would tend to increase the number of out of state users, and recreation classification of river segment A with improved access would tend to increase state and local users.

This alternative protects the free-flowing nature and outstanding values of river segment B and all but 5.5 miles of segment A. The river section excluded from designation contains a high percentage of private lands.

4. Alternative D. Under this alternative, all of the eligible river segments would be designated. The 5.5 mile river section between the west Forest boundary and the Verde Ranch would be classified as recreation resulting in total recreational classification for river segment A. River segment B would be classified as scenic and wild as in Alternative C.

The effects of implementing this alternative would be essentially the same as for Alternative C with the added impacts of additional private lands. Scenic easements or zoning restrictions would be required on private lands that lie along 4 miles of the designated 5.5 mile river section.

This alternative protects the free-flowing nature and outstanding values of the two Verde River segments designated for study in the Wild and Scenic Rivers Act, as amended.

D. Relationships Between Short-Term Uses and Long-Term Productivity

1. Alternative A. No loss in long-term productivity of the environment would result from short-term uses in the foreseeable future under this alternative.

This alternative would allow for dams and other developments that could affect the free-flowing nature of the river. These developments could reduce long-term productivity of the river in providing water-based recreation derived from the free-flowing condition of the river. However, these same developments could provide long-term productivity of hydroelectric power, irrigation water, and recreation activities oriented around the use of lakes created by a dam.

2. Alternative B. The short-term uses planned under this alternative would not affect long-term productivity. This alternative designates only segment B of the river between Beasley Flats and Table Mountain. Therefore, potential for water storage and/or power production in segment B would be legislatively removed for the foreseeable future but would remain a potential long-term option. Some opportunities for intensive or incompatible development on one parcel of private land may be eliminated by zoning ordinances or by Federal acquisition of scenic easements. A very small acreage would be committed to roads, trails, parking and sanitation facilities.

The relationship between short-term uses and long-term productivity in river segment A between the west Forest boundary and Clarkdale is the same as Alternative A.

3. Alternative C. This alternative designates all but 5.5 miles of the river within the study area. The constraints on potential water developments within the classified river sections are the same as for Alternative B. This alternative affects 4 additional private land parcels, thus more development options would be foregone. This alternative commits additional acres to roads, parking and sanitation facilities, removing this land from vegetative production.
4. Alternative D. This alternative designates all eligible river segments; therefore, constraints on water developments would be placed on the entire study length. Under this alternative all private landowners could be affected by zoning ordinances or scenic easement acquisition. This alternative would also commit additional acres to roads, parking and sanitation facilities.

E. Summary of Probable Adverse Environmental Effects Which Cannot Be Avoided

1. Alternative A. The probable adverse environmental effects under Alternative A are limited. Additional subdivision of the private lands within the study area could occur. Unless carefully planned, subdivision development can have adverse effects on visual qualities, wildlife habitat, and recreation experiences in the immediate river area. Long-term probable adverse environmental effects are not expected, but could result from implementation of economic development options (reservoirs, highways, etc.) which could occur under this alternative.
2. Alternative B. The probable adverse environmental effects under this alternative are also quite limited. Some modification of the natural environment would occur with the improved road and trail access and the additional parking and sanitation facilities needed in river segment B between Beasley Flats and Table Mountain. Development options on the private land could be constrained by zoning ordinances or Federal purchase of development rights.
3. Alternative C. The probable adverse environmental effects are the same as in Alternative B except additional private land rights could be constrained. Also, some modification of the natural environment would occur because of road construction, trail construction, and additional parking and sanitation needs.
4. Alternative D. The probable adverse environmental effects are the same as Alternative B except all private land parcels within the study area could be affected by scenic easements or local zoning.

F. Irreversible or Irretrievable Commitment of Resources

1. Alternative A. None of the activities proposed under this alternative would result in short-term irreversible or irretrievable commitment of resources.

Economic developments which could occur under this alternative in the future (water storage, hydroelectric development, highway construction, utility corridors, mining) could result in irreversible or irretrievable commitment of resources but would be addressed after specific proposals have been made, through the environmental analysis process.

2. Alternatives B, C, and D. Designation into the National Wild and Scenic Rivers System does not constitute an irreversible or irretrievable commitment for the future, as Congress has the authority to change or rescind the designation if the need occurs. Zoning ordinances could be changed or eliminated and scenic easements could be returned to landowners. The improved roads, trails, and parking areas could be considered as an irreversible commitment of the lands upon which they are constructed.

## VI. EVALUATION OF ALTERNATIVES

In Table 9 the four alternatives are evaluated using the criteria outlined in Section III, C. The ratings used to measure the degree to which the alternatives meet the criteria are for relative comparison purposes only and should not be interpreted to mean absolute criteria attainment. Table 9 is used for a horizontal comparison of the alternatives for each evaluation criterion. The ratings must not be added vertically because the evaluation criteria are not equally important.

TABLE 9

### EVALUATION OF ALTERNATIVES

<u>CRITERIA</u>	<u>ALTERNATIVES</u>			
	<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>
1. Preserving free-flowing conditions and outstandingly remarkable characteristics of the river and its immediate environment.	-	0	++	++
2. Conform to availability and suitability of those lands involved.	+	+	+	+
3. Minimize impacts on private land rights.	++	+	-	- <u>1/</u>
4. Display high degree of compatibility with desire and recommendations of State and local governments.	0	0	0	0
5. Increase supply of outdoor recreation opportunities and services through Forest Service programs that emphasize dispersed recreation.	0	+	++	++
6. Provide a mix of goods and services responsive to local area economic growth.	+	0	-	-
7. Ensure protection and enhancement of habitat for threatened and endangered wildlife species.	0	+	++	++

++ Alternative meets the criteria to a high degree.

+ Alternative meets the criteria to a moderate degree.

0 Alternative meets the criteria to a minimal degree.

- Alternative does not meet the criteria.

1/ Neither Alternative C or D meets the minimum criteria. Alternative D has twice the impact on private land as Alternative C.

Following is a detailed discussion of the summarized information in Table 9.

Criterion 1. Alternative D obviously meets the intent of the Wild and Scenic Rivers Act. Even though Alternative C excludes 5.5 miles of river, it still meets the criterion to a high degree. Alternative B also meets the intent of the Act but to a lesser degree. Alternative A does not provide for long-term free-flowing conditions or protection of outstandingly remarkable values for any portion of the river; therefore, it does not meet this criterion.

Criterion 2. All four alternatives were designated to conform to the availability and suitability of the lands involved; therefore, they all equally meet this criterion. However, the present, undeveloped primitive condition of the river and its immediate environment makes it available and suitable for protection of its free-flowing character and associated values under the National Wild and Scenic Rivers System.

Criterion 3. River designation could result in some loss of development rights by private landowners. Alternative B may require a scenic easement or zoning restrictions on a portion of the Brown Springs private property although these restrictions are not essential they may be desirable. This loss of private land development rights would be relatively minor when compared to Alternatives C and D. Alternative C could impact 737 acres of private lands and Alternative D could impact 1,500 acres of private lands and twelve landowners. Alternative A is preferred by local landowners because it recommends no designation and would have no impact on landownership rights.

Designation in the National Wild and Scenic Rivers System would also place some constraints on the general public. For example, vehicle use would be restricted to designated roads within the river corridor. These restrictions would be viewed by local river users as impacts on their rights to use the river.

Criterion 4. There were seven state agencies that supported designation of the river and seven that did not indicate a preference. The Arizona State Land Department indicated that designation of the river would be premature at this time. They stated that until the watershed has been adjudicated and the water rights of the State of Arizona, including claims to CAP water, has been fixed by court decree, the State Land Department must protest any proposal which may adversely impact the claims of the State.

The Arizona Game and Fish Department strongly supports designation under Alternative C. The Department feels that designation would provide the needed riparian habitat protection, zoning restrictions and enhance the department's efforts to reestablish the river otter.

Comments received from the Arizona Outdoor Recreation Coordinating Commission support the Wild and Scenic River designation. The commission emphasizes the limited opportunities for recreation on free-flowing

ivers in Arizona and believe protection of these rivers is needed as the state's "continued economic and population growth exert increasing pressure on the state's limited resources".

Most of the river's study corridor is located within Yavapai County. Approximately 17 miles along the east side of the river between the junction of Fossil Creek and Table Mountain is located in Gila County. Throughout the study process Gila County has stated its preference for no designation (Alternative A). Reasons include opposition to any classification action which would restrict or reduce present multiple-use of Gila County resources or increase county custodial services and cost, such as Search and Rescue Operations. Yavapai County Board of Supervisors were aware of the river study but did not comment.

The Prescott City Council supports designation of the river under Alternative C. The council stated that this alternative "would avoid or, at least minimize any potential conflict with the future use of Prescott's water needs."

Local ranching interests favor Alternative A, the no designation alternative. They have expressed the concern that there could be restrictions on grazing which would affect the local ranching economy.

Comments received on the Draft Environmental Statement from residents of the Verde Valley indicated 84 percent were in favor of no designation. A summary of all comments received indicates a preference of 51 percent for designation.

Criterion 5. All of the alternatives assure a short-term continuance of dispersed recreation management along the Verde River. However, only Alternatives B, C, and D that contain designated river segments assure dispersed recreation emphasis over the long term. Alternative B designates 38.5 miles of the river's study length and meets the criterion to a moderate degree when compared to Alternatives C and D, which designates for 72.5 miles and 78 miles respectively.

The specific capacities and demands for dispersed recreation use along the Verde River are not currently known. However, it can be anticipated that, at some point in the future, demand will exceed capacity under all alternatives. Alternative A would provide the opportunity for reservoir development and thus increase the capacity for reservoir-related opportunities, while at the same time reducing the opportunities for dispersed recreation use associated with a free-flowing river.

Criterion 6. River designation would have little or no effect on grazing or water outputs on the Tonto, Prescott or Coconino National Forests. Also, the action would not change the Forest's ability to meet rapidly-changing local needs. Designation over the long term could have a minor negative effect on mineral and energy development. Also, river designation prevents some recreation development and

private land development opportunities which could increase revenues in Yavapai and Gila Counties to some degree.

Alternative A best meets this criterion because it does not eliminate future options for development on National Forest and private lands. Alternative B meets this criterion to a higher degree than C or D because river segment A between the Forest boundary and Clarkdale remains open for development.

Criterion 7. Protection and enhancement of habitat for threatened and endangered wildlife species are achieved by all four alternatives. The emphasis currently being placed on management of the riparian resource along the Verde River is the result of a plan prepared by the Tonto, Prescott and Coconino National Forests to resolve livestock-riparian conflicts. The plan contains a development program which is designed to promote the establishment of cottonwood regeneration along the river channel. The exclusion of livestock during the seedling (cutting) establishment period is expected to enhance the habitat for both threatened and endangered and other wildlife species. The program prescribed by the plan will continue to be implemented whether or not the river is designated. River designation could constrain some proposed improvements, but little effect is anticipated.

Scenic easements or zoning restrictions required by Alternatives C and D would prevent development of private lands along the river's edge, reserving these sites for production of riparian vegetation. The private land parcel in Alternative B does not extend to the river's edge; therefore, the potential for destroying riparian habitat does not exist.

River designation with the recommended improved access would increase the number of recreation visitors. This increase could have an adverse impact on wildlife, specifically the nesting bald eagle. The Forest Service is currently placing restrictions on the using public during critical nesting periods. This practice is expected to continue whether or not the river is designated.

Designation under Alternatives B, C and D would ensure protection of the existing eagle habitat by precluding dam construction and excessive diversions on portions of the river. Under Alternatives C and D, river segments B and all or part of river segment A would be designated. These two alternatives would provide more protection insurance for a greater length of river than Alternative B which only designates river segment B. It should be noted that river segment B contains established eagle nesting territories. None have been recognized in river segment A.



## VII. IDENTIFICATION OF THE PREFERRED ALTERNATIVE

### A. Preferred Alternative.

Alternative B is the preferred alternative. This would classify 17.5 miles of the river as wild and 22 miles as scenic. The total area designated as components of the Wild and Scenic Rivers System would encompass about 12,640 acres of which 26 are private, and 12,614 are National Forest System lands. The estimated cost of the action over a 10-year period excluding annual maintenance, is \$220,500. The Forest Service would administer the designated river component and bear would all costs of the recommended action. State and local agencies would be asked to support the designation. See preferred alternative map, page iv.

Alternative B is a compromise between local desires and other public interests. Designation under this alternative would preserve the most pristine segment of the Verde River for future generations. It would also reduce the impacts on private landowners and keep the options open for flood control and exchange of CAP water.

The reasons for selection of Alternative B, which is a change from the preferred alternative in the Draft Environmental Impact Statement (Alternative C), are as follows:

1. The local public (Verde Valley) expressed strong opposition to designation. The Valley residents represented over 46 percent of the total respondents to the Draft Environmental Impact Statement of which 84 percent preferred no designation. The reasons given varied from "get out-leave us alone" to concern for excluding future developments.
2. The cost of implementing Alternative C (\$1,693,700) was questioned by several respondents. Those that preferred designation questioned if the expenditures were necessary. The respondents that preferred to continue current management indicated the cost of implementation was exorbitant and that the American people could not afford the expense at this time.
3. There was a concern that designation would hinder or preclude a possible exchange of Central Arizona Project water with Salt River Project water along the Verde River. This was expressed by several respondents including the Arizona State Land Department and the Department of Interior - Water and Power Resources Service. See discussion on Central Arizona Project in Appendix D.
4. The Central Arizona Water Control Study should resolve the Phoenix Valley flooding problems. However, the flooding of the Verde Valley will continue unless some action is taken. The current flood control study involving the old Clarkdale Dam

site in river segment A has not been released to the public. See CAWCS summary in Appendix C.

5. All private landowners within the river study corridor that responded to the Draft Environmental Impact Statement objected to designation because of the loss of private ownership rights through scenic easements. With the exception of one 26-acre parcel, all private lands involved (1474 acres) are located in river segment A. While desirable, the acquisition of scenic easements or county zoning on segments is not essential for management as a designated river.
6. Many non-Verde Valley respondents that preferred designation gave examples of their personal experiences in river segment B. Some stated they had not yet seen or used the river but would like to keep it free-flowing for future generations. It was apparent from the comments that river segment A receives more use by local residents than by other publics.

Alternative B meets all seven of the selection criteria to a moderate or minimal degree. It presents a reasonable mix of outputs requested or expected by the public. The action would preserve the free-flowing condition and the outstandingly remarkable characteristics of the river segment between Beasley Flats and Table Mountain. It would increase the opportunities for dispersed recreation and protection and enhancement of threatened and endangered wildlife species and plants.

The alternative conforms to the availability and suitability of the lands involved.

Local and County governments were divided with Prescott Town Council favoring designation and Gila County favoring no designation. The responding state agencies that provided substantial comments were also split. The Arizona Game and Fish Department and the Arizona Recreation Coordinating Commission supports designation, whereas the State Land Department prefers deferring action until water rights have been determined and CAP allocations made.

Designation would impose minor restrictions on lands currently open for mining exploration and mineral leasing. Off-road vehicle use would be prohibited. However, this loss to the local economy would be more than offset by income generated by increased recreation use.

#### B. Reason for Non-selection.

Alternative A. This alternative was not selected because it does not insure preservation of any portion of the river in a free-flowing condition, nor would it provide maximum protection for the outstandingly remarkable values. Also, this alternative would not greatly enhance dispersed recreational opportunities, because the funding of improved access and construction of support facilities would receive a relatively low priority without designation of the river.

The alternative meets only one of the selection criteria to a high degree and three to a moderate degree. It would eliminate the impacts of designation on private lands and permit development along the river, which could provide a mix of goods and services to the local area economy.

Alternatives C and D. The criteria evaluation table indicates that Alternatives C and D are rated the same. This is not surprising since the only difference between the alternatives is the designation of the uppermost 5.5 miles of the river. Alternative D satisfies criteria 1, 5, and 7, to a slightly higher degree than Alternative C. However, this satisfaction is offset by criteria 3, where the biggest difference between the two alternatives exists. Since 4 miles of the 5.5 mile section is in private ownership, Alternative D would restrict development on almost twice as many acres of private lands (1,500 acres) as Alternative C, and substantially increase costs associated with obtaining access and scenic easements. Designation of the private land river section would also increase the cost of management plan preparation and decrease the local tax base. Both Alternatives C and D would preclude or restrict flood control and CAP water exchange activities.

Alternative Eliminated (Alternative E). It was determined during the study that the river section between Table Mountain and Tangle Creek qualifies for inclusion in the National Wild and Scenic Rivers System. The only reason the 10.5 mile section was not added to river segment B and recommended for designation under Alternative B was because the effects were not evaluated and presented to the public in the Draft Environmental Statement. We received comments from 73 respondents requesting that the river section be added to Alternative C or D for consideration.

### C. Management Plan.

If the Verde River is designated as a component of the National Wild and Scenic Rivers System, a management plan would be prepared. The objectives of the plan would be to protect and enhance the values which enabled the river to be added to the National System and at the same time, produce minimum impacts on private landowners and existing land use practices.

As a minimum, the management plan would contain the following:

1. Specific boundaries of the designated river segments.
2. A determination of instream-flow needs for Wild and Scenic River purposes.
3. River access system including sanitation and parking facilities.

4. Measures for protection of fish and wildlife resources with particular attention given to the bald eagle and riparian habitat.
5. Measures for protection of scenic, historic and cultural values.
6. An evaluation of private land to determine scenic easement and/or zoning ordinance requirements.
7. A determination of recreation use capacity and controls including off-road vehicle use.
8. An evaluation of public safety requirements.
9. A pollution monitoring system.
10. Measures for protecting water quality.
11. Fire protection considerations.
12. Recurring operation and maintenance needs including law enforcement requirements.
13. Coordination with State, county, and local governments.

## VIII. CONSULTATION WITH OTHERS

### A. Summary of Public Involvement

Public involvement for the study followed the Public Involvement Plan developed to coordinate information dissemination and public participation for simultaneous study of the Salt, San Francisco and Verde Rivers. In March 1979 an issue-scoping meeting was held with Federal and State agency representatives to discuss the study of the three rivers. At this time, initial issues and concerns of these agencies were identified. Represented at the meeting were 19 agencies, Office of the Governor and three Congressmen. Also in March, key citizens and county governments were briefed on the study process and Congressional direction. An issue-scoping meeting was held in April 1979, for representatives of typical statewide user groups and organizations such as ranchers, hikers, campers, river runners, timber industry, environmentalists, outdoor writers, etc. Representatives from 14 organizations and groups attended this meeting.

A public open house was held in Mesa, Arizona in May 1979, to discuss the study and public concerns on the three Arizona rivers. The open house was attended by 16 people. Also in May, an open house was held in Camp Verde, Arizona to discuss specifically the study and public concerns relating to the Verde River. This open house was attended by seven people. Individual briefings on possible impacts of the study were also held with congressional representatives in Phoenix during this period.

All these initial public participation opportunities were announced in advance through statewide and local news media, personal contacts with key individuals, local government officials, organization leaders, and announcement in the Federal Register. A special effort was made to utilize printed and electronic news media for dissemination of information concerning the study.

A briefing was presented on the study of the Verde River at the Yavapai County Board of Supervisor's Meeting in March 1979. The County was invited to participate in developing the eligibility criteria to be used in evaluating the three rivers.

On September 19, 1979, a workshop was held in Phoenix, Arizona to receive input on the eligibility criteria for the three Arizona rivers. The workshop was attended by 42 people representing Federal, State and local government agencies, affected counties, statewide organizations and user groups.

In November 1979, an array of alternatives that considered designation and non-designation of the rivers was presented to the

public by publication of a Forest Service produced Wild and Scenic Rivers newspaper. Included in the newspaper were descriptions of the alternatives with maps, franked return mail comment sheets, and information on public open house meetings scheduled for December 1979. Over 3,000 copies of the newspaper were distributed.

The open house public meetings held in December 1979 in Phoenix and Camp Verde were attended by 78 people. The newspaper and December open house meetings resulted in 77 written comments concerning the Verde River Wild and Scenic Rivers Study.

Throughout the study process there have been multiple contacts with range permittees, landowners, civic organizations, local government representatives and other interested individuals.

The contact methods varied, depending on the anticipated public interest. A radio talk show conducted in Cottonwood, Arizona, prior to the December Verde River open house meeting, produced the largest public audience.

The Draft Environmental Impact Statement was released to the public in August 1980. During the 90-day review period, the study received considerable newspaper, radio and television publicity in the Phoenix, Flagstaff, Prescott and Camp Verde areas. Individual meetings were held with interested private land owners, range permittees, groups, organizations and agencies.

#### B. Summary of Comments Received

The participants at the September 1979 eligibility criteria workshop expressed their opinion that the Verde River, being a free-flowing river located in the semi-arid southwestern region, was in itself, unique. Workshop participants determined that the river has outstanding scenic, fish and wildlife, historic and cultural values.

A total of 379 written responses were received on the Draft Environmental Impact Statement. Substantive input by some respondents resulted in changes in the statement including selection of a new preferred alternative.

Tables 10 and 11 provide a brief summary of the respondents by alternative preference and their residence.

TABLE 10  
SUMMARY OF RESPONDENTS  
BY ALTERNATIVE PREFERENCE

Respondent Represented	Total Respondents	Alternatives				
		A	B	C	D	<u>2/</u> Unknown
Federal Agencies	10			1		9
Congressional Delegates	1	1				
Arizona State Agencies	15	1		6	1	7
State Elected Officials	0					
Counties	1	1				
County-Elected Officials	0					
Town & City Councils	1			1		
Indian Tribes	0					
Corporations	4	2				2
Organizations	19	2	2	6		9
Individuals	332	164	2	75	27	64
Total	383 <u>1/</u>	171	4	89	28	73

1/ There were 379 respondents to the Draft Environmental Statement. Gila County, Prescott City Council, Arizona Outdoor Recreation Coordinating Commission and the Southern Environmental Council responded prior to completion of the draft.

2/ These respondents preferred either Alternative C or D plus designating the additional 10.5 miles of river between Table Mountain and Sheep Bridge.

TABLE 11  
RESIDENCE OF INDIVIDUAL RESPONDENTS  
BY ALTERNATIVE PREFERENCE

	Alternatives					<u>1/</u>
	Total Respondents	A	B	C	D	
Bellefont, AZ	1					1
Bisbee, AZ	1					1
Camp Verde, AZ	78	75	1	2		
Carefree, AZ	1			1		
Chino Valley, AZ	17					17
Clarkdale, AZ	4	2		2		
Cornville, AZ	3	3				
Cottonwood, AZ	35	32		3		
Dewey, AZ	1	1				
Douglas, AZ	1					1
Flagstaff, AZ	16		1	3	3	9
Fredonia, AZ	1	1				
Kayenta, AZ	1					1
Lake Montezuma, AZ	7	7				
McNeal, AZ	1					1
Mesa, AZ	7	6				1
Page, AZ	1	1				
Paradise Valley, AZ	1					1
Paulden, AZ	1					1
Phoenix, AZ	17	7		4	1	5
Prescott, AZ	76	3		49	19	5
Prescott Valley, AZ	1			1		
Rimrock, AZ	5	3		1		1
Scottsdale, AZ	3	2				1
Sedona, AZ	17	4		3		10
Sun City West, AZ	7	7				
Sun Lakes, AZ	1	1				
Tempe, AZ	6	3		1		2
Thatcher, AZ	1	1				
Tuba City, AZ	1					1
Tucson, AZ	10	1		1	4	4
Yuma, AZ	1	1				
Juneau, AK	1			1		
San Francisco, CA	1					1
San Mateo, CA	1			1		
Unknown	5	3		2		
TOTAL	332	164	2	75	27	64

1/ These individual respondents preferred either Alternative C or D plus designating the additional 10.5 miles of river between Table Mountain and Sheep Bridge.



For purpose of analysis, the respondents were divided into two groups. The local group is represented by Camp Verde, Cottonwood, Sedona and communities within and surrounding the Verde Valley. All other comments were analyzed together in the second group.

The local public indicated a strong preference for Alternative A with less than 16 percent favoring designation. Other than local respondents indicated a strong preference for designation with less than 21 percent favoring Alternative A. Combining all individual comments received, slightly over 50 percent preferred one of the designation alternatives (Alternative C was the most frequently preferred).

The most frequent reasons given for preference of a given alternative are summarized as follows:

#### Alternative A

- Retains multiple-use management option.
- Provides for no change, keeps the river as it is.
- Not in favor of adding additional government regulation or controls to the river.
- Provides least interference with private landowner's rights.
- Provides more opportunity for economic development flexibility.
- Designation would hinder needed flood control action.
- Keeps more options open for energy development.
- Designation would be a further burden on the taxpayer.
- Designation would increase recreation use which would increase pollution and other adverse use effects.
- Continuation of present management is the best way to protect and reduce adverse impacts on wildlife.

#### Alternative B

- Designation of the full length of the river would interfere with private ownership rights and traditional uses.
- River segment A is not conducive to most forms of river running.
- This alternative will protect the beautiful lower reaches of the Verde River and the bald eagle.
- The landforms in river segment A are not exceptionally beautiful.

### Alternative C

- This alternative will protect some of the few remaining riparian areas in Arizona.
- Continuing current management will eventually erode the quality of the existing riparian habitat.
- Provides protection for wildlife including threatened and endangered species.
- Designation recognizes the recreation values and opportunities of the river.
- This alternative preserves the river in its free-flowing condition.
- Designation will preserve the river for future generations.
- The river has outstanding scenic beauty which needs to be protected and preserved.
- This alternative prevents development along the river.
- Less impact on private landowners than Alternative D.

### Alternative D

- Designation will protect the scenic, geologic and aesthetic values.
- Provides protection for threatened, endangered and other wildlife species.
- The recreation values are worthy of protection.
- It is important to preserve the wilderness values.
- The remaining few free-flowing rivers should be protected and remain free-flowing.
- It is important to preserve riparian habitat because a large portion has already been lost.
- Entire Verde River should be designated regardless of private ownership.
- Opposed to dams or power plants, there is already abundant power available for Arizona.

Alternative C or D Plus Designation of 10.5 Miles Between Table Mountain and Sheep Bridge

- Provides protection for threatened, endangered or special interest wildlife species - maximum river designation.
- The maximum amount of the river's length should be protected for riparian values considering the small amount currently protected in Arizona.
- Provides maximum recreation opportunities such as hiking, swimming, floating, etc.
- The area contains many sites of historical and cultural values.
- Preserves the free-flowing river.
- Preserves the beauty of the river.
- Let's keep the last one for future generations to enjoy.
- Preserves the river in its natural state.
- The best way to keep the river the way it is is to put it into the National Wild and Scenic Rivers System and maintain the status quo.

The information provided in the preceding portion of this section should not be analyzed as a vote count, but considered a reflection of concerns and a rough indicator of public sentiment toward management of the Verde River. The following conclusions were drawn concerning public response to the Draft Environmental Statement:

1. Private Landowner Rights - A high percentage of the respondents that preferred Alternative A gave the loss of private landowner rights as their reason for non-designation of the river. They expressed their feelings that a private landowner is already faced with too many government controls and that additional development constraints are not needed. All private landowners in the study area that responded to the Draft Environmental Statement expressed their preference for Alternative A.
2. Transportation Development - Several respondents expressed their feelings that additional access routes to the river were not needed. However, some improvement of the existing roads and trails would be desirable if it could be done without increasing the use. There is a concern that increased use will degrade the riverine environment.

3. Recreation Development - There were few responses indicating a need for developing recreation facilities. Most respondents preferred "keeping the river as it is today" serving dispersed recreation users.
4. Multiple Use - Considerable support was expressed for a continuation of present management under Alternative A. Several respondents indicated they would like to see future options left open for geothermal development, oil and gas exploration, mineral extraction and hydroelectric power development.
5. Protection of the River - Respondents that preferred designation and those that did not used "protection of the river" as their reason. Some were satisfied with the protection provided by current management and others preferred Congressional designation to protect the river values. The local public (Verde Valley) expressed a strong preference for continuing current management direction.
6. Wilderness - Wild and Scenic Rivers - Several of the respondents that preferred designation, expressed a desire to keep the river, especially the South Segment (river segment B), in a near wilderness state. The major reasons given were to preserve the river for future generations, protect the wildlife and riparian vegetation, and preserve the natural beauty of the area.
7. Increased Recreation Use - In general, there was a strong opposition to any action that would increase recreation use along the river. The respondents cautioned the Forest Service that increased use could adversely effect the nesting bald eagle population and cause deterioration of the riparian habitat.
8. Protection of the Bald Eagle - Many of the respondents that preferred designation stated protection of the eagle as their reason. They felt that designation would add emphasis to management of threatened and endangered species.
9. Flood Control Needs - Considerable opposition to designation was expressed by Verde Valley residents because it would preclude flood control dams along the river. Excessive flooding has occurred during the past three years which resulted in soil loss and damage to private property. They expressed a strong desire to keep the option open for construction of flood control facilities. See discussion in Appendix C.
10. CAP Water Exchange with SRP - Several agencies and individuals commented they would like to see the option left open to exchange Central Arizona Project water with Salt River Project

water. They felt that designation would hinder or prevent an exchange. See discussion in Appendix D.

11. Keep the River As It Is - This statement was made by many respondents that indicated a preference for Alternative A. In many cases, the same respondent stated they did not want any changes in the river. Statements of this type were difficult to evaluate because of the apparent conflict with the Forest Service selected alternative presented in the Draft Environmental Impact Statement. Alternative A would permit dams and diversions which could dry up the river during heavy use periods. This could change the entire river environment. On the other hand, designation under Alternatives B, C and D would preserve the free-flowing nature of the river and thus be more responsive to "keeping the river as it is."

Several federal and state agencies and organizations responded to the Draft Environmental Statement. Their comments and the Forest Service responses to the comments are included in appendix F of this document.

## APPENDIX A

### STATE AND FEDERALLY LISTED THREATENED AND ENDANGERED SPECIES

#### Bald Eagle - (*Haliaeetus leucocephalus*)

Bald eagles using the Verde River are federally and state listed as an endangered species. The entire Verde River and one-quarter mile on both sides has been identified as essential habitat for both nesting and wintering bald eagles. Migrant bald eagles use the river for wintering and the resident bald eagles use it for nesting and rearing young during the winter, spring, and summer periods.

There are only thirteen known active nesting territories in the entire Southwest United States. Two occur in the Verde River study area and two occur in the Salt River study area. The nesting birds tend to require the river environs more than the wintering birds. Observations and studies indicate the southern segment of the Verde River is used for nesting and both the northern and southern segments are used for winter foraging. During the winter period, the eagles have been observed as far as eight miles from the river canyon.

Many observers are of the opinion that regeneration of cottonwood and other riparian hardwood trees along the Verde River essentially ceased with the advent of unrestricted cattle grazing about a century ago. The existing trees are nearing the end of their natural life span and attrition by death, floods, etc., is occurring at an alarming rate. This situation is of concern to many wildlife managers and observers who feel that the bald eagle prefers trees to cliff sites for nesting. The same managers and observers are quick to point out that cliff sites are unsuitable alternatives to trees because of reduced fledging survival. Trees are also important as streamside foraging perches for capture of fish, the primary dietary item for the eagles.

The Forest Service has been aware of the importance of the riparian habitat along the Verde and other rivers for some time. However, only in comparatively recent times has the probable adverse effect on the bald eagle been of concern. In 1978, the Maricopa Audubon Society contacted the Forest Service and expressed their concern with threat of a lawsuit, that the eagle habitat was not being adequately protected and managed. As a result, the Forest Service developed a position statement and proposed to proceed with a short-range program of direct habitat improvement in areas crucial to the nesting pairs of eagles, accompanied by a long-term program of range management designed to improve the entire riparian resource on both the Verde and Salt Rivers. The short-range program consists of excluding livestock through fencing of key areas and planting young cottonwood cuttings. The Audubon Society is currently evaluating the proposal. Classification of the study area would enhance its value for bald eagle habitat. Bald eagles require isolation from man's disturbing activities, as well as riverine

habitat for feeding and rearing young.

Peregrine Falcon - (Falco peregrinus anatum, a federally and state endangered species)

The peregrine falcon is not known to nest along the Verde River system. However, migrants have been reported in the state. The falcon is a predator of small to medium size birds. The Verde River is a particularly attractive travelway because of the high bird populations associated with the riparian ecosystem. The major portion of the study area has been inventoried and is deemed suitable or marginally suitable. The Tonto National Forest is in the process of declaring their portions of the study area as essential habitat.

Woundfin - (Plagopterus argentissimus)

The woundfin is federally and state listed endangered species of fish. It is a silvery colored minnow that seldom exceeds three inches (75mm) in length. Historic collections of this fish have not been made above the Salt-Verde confluence, however, the woundfin recovery plan (1979) states that there is a good reason to believe that woundfin occurred further upstream on the Verde River. The plan further identifies the Verde River above Horseshoe Reservoir as a prime reintroduction site. Target date for the beginning of transplanting activities is FY 81.

River Otter - (Lutra canadensis)

The river otter, a large mustellid, is native to the Verde River system. It is now extirpated in the Verde. It is listed by the State of Arizona as a species in danger of being eliminated from Arizona (Group II). The Arizona Game and Fish Department, with the support of the United States Forest Service, is currently considering the feasibility of re-establishing the river otter in the upper Verde River.

Gilberts Skink - (Eumeces gilberti)

A large (8-9 inch) olive or brown-colored lizard. An isolated Arizona

population is reportedly located in the Hassayampa River. There is a possibility this species could be along the Verde in the study area. This species is listed by the state as being in danger of being eliminated from Arizona (Group II).

Desert Tortoise - (Gopherus agassiri)

This species is listed by the state as a species whose status in Arizona may be in jeopardy in the foreseeable future (Group III). It may be found in the Sonoran Desert Scrub portion of the study area.

Gila Monster - (Heloderma suspectum)

This unique poisonous lizard of the Southwest is found mainly in the semi-desert grassland portion of the study area. It is listed by the state as a species whose status in Arizona may be in jeopardy in the foreseeable future (Group III).

Black-crowned Night Heron - (Nycticorax nycticorax hoactle)

This medium-sized riparian and water-loving bird has been seen along the Verde River. The state has listed it as a species whose status in Arizona may be in jeopardy in the foreseeable future (Group III).

Zone-tailed Hawk - (Buteo albonotatus)

This medium-sized long-tailed raptor nests in riparian areas along streams in the Southwest. It is another one of the unique raptors of the Southwest. It is listed by the state as a species whose status in Arizona may be in jeopardy in the foreseeable future (Group III).

Black Hawk - (Buteogallus a. anthracinus)

This medium to large-sized bird is another of the riparian nesting raptors that is unique to the Southwest United States. They are known to nest on the Verde River and its tributaries. It is listed by the state as a species whose status in Arizona may be in jeopardy in the foreseeable future (Group III).

Osprey - (Pandion haliaetus carolinensis)

The fish hawk is occasionally seen as a winter visitor along the upper Verde River. It is listed by the state as a species whose status in Arizona may be in jeopardy in the foreseeable future (Group III).

Razorback Sucker - (Xyrauchen texanus)

This large (30-40 inch) fish was once abundant in all large streams in Arizona including the study area. It is now believed to be extirpated. The study area is assumed to be a potential reintroduction site in the absence of a species recovery plan. This fish is listed by the state



as a species whose status in Arizona may be in jeopardy in the foreseeable future (Group III).

Loach Minnow - (Tiaroga cobitus)

This small 2-3 inch minnow is a rifle inhabitant of small to medium rivers in the Gila River Basin. They are thought to be extinct in the upper Verde River. The state lists it as a species whose status in Arizona may be in jeopardy in the foreseeable future. The study area is a possible future transplant site.

Spikedace - (Meda fulgida)

This small fish, although once widespread in the Gila River System, now exhibits a very reduced distribution, with populations occurring in Southeastern Arizona and in the Verde River. Within the Verde River the fish is known to occur only near the river bridge on Forest Road #354 and the Packard Place.

Following is a list of birds, reptiles, and fish that probably occur in the study area. The state lists them as species of special interest because of limited distribution in Arizona (Group IV).

Mississippi kite - Ictinia mississippiensis

Arizona mountain kingsnake - Lampropeltis pyromelana

Narrow-headed water snake - Natrix rufipunctatus

Round-tailed chub - Gila robusta seminuda

APPENDIX B

THREATENED AND ENDANGERED PLANTS  
VERDE RIVER

The study segments of the Verde River are relatively inaccessible and virtually unsurveyed for threatened and endangered plant species. However, some plant species that have been nominated for Federal protection are suspected to exist in the study areas.

Some of these plant species are adapted to the type of micro-environments created by the mist and high humidity from fast, free-flowing, cascading waters. Steep, dark, inaccessible habitats found along these yet unmodified waters afford remnant islands of near pristine habitat conditions. The habitat serves as a final retreat for some plant species trying to survive in a harsh, ever-changing environment. These habitats and plants cannot be sustained or duplicated with placid bodies of water.

The existence or non-existence of currently listed threatened and endangered plant species within the study area has not been verified. Designation of the river is not expected to have an effect on the plants if they do exist. Therefore, it was decided that consultation with the U.S. Fish and Wildlife Service was not necessary.

The following information is based upon collection records, literature review, and probable habitat comparison:

List of Plants That May Occur Within The Proposed Designation Area 1/

Plant Species	Nominated For Federal Protection 2/	
	Category 1 3/	Category 2 4/
<u>Erigeron lobatus</u>	X	
<u>Perityle saxicola</u>	X	
<u>Graptopetalum rusbyi</u>		X
<u>Agave arizonica</u>	X	
<u>Agave toumeyana</u> <u>var. bella</u>	X	
<u>Eriogonum ripleyi</u>		X
<u>Eriogonum capillare</u>	X	
<u>Cheilanthes pringlei</u>		X
<u>Cimicifuga arizonica</u>	X	

1/ Source: Jerry Davis, Tonto N.F.; Reggie Fletcher, R.O.

2/ Endangered and Threatened Wildlife and Plants, Review of Plant Taxa for Listing as Endangered and Threatened Species, Federal Register, December 15, 1980, Part 4, Department of Interior, Fish and Wildlife Service.

3/ Category 1 - Data supports listing as Endangered or Threatened.

4/ Category 2 - Current data indicates probable appropriateness of listing.

## APPENDIX C

### STATUS OF FLOOD CONTROL AND HYDROELECTRIC GENERATING FACILITY PROPOSALS ALONG THE VERDE RIVER

#### Central Arizona Water Control Study (CAWCS) 1/

The CAWCS is a study under the direction of the U.S. Water and Power Resources Service and the U.S. Army Corps of Engineers. The purpose of the study is to identify a preferred plan to reduce flood damage along the Salt and Gila Rivers and provide regulatory storage of water for the Central Arizona area. The Verde River is a major contributor to the Salt River and thus becomes a key element in the study.

The study is currently being conducted in three stages. Stage I was completed in August, 1979. During this stage, one of the four control elements (actions) being considered for the Verde River was dropped. The Tangle Creek Dam was eliminated because of geotechnical problems including hot springs deep under the dam site and unsuitable foundation material for the left abutment. The remaining three control elements modified Horseshoe Dam, Cliff Dam and New Bartlet Dam were carried forward to the next stage.

Stage II was completed in November-December, 1980. It consisted of a "screening" process to select the best option of the remaining three elements. The Cliff Dam was selected for the Verde River because of moderate costs and environmental impacts.

The next step was to formulate concepts using the systems (elements) selected during the screening process. Only those concepts that affect the Verde River will be discussed in the following text.

#### Concept I:

options is to construct or enlarge a single structure on either the Salt or Verde River. Should the Cliff Dam be selected as the preferred structure, it would provide flood control and additional amount of water conservation space for CAP regulatory storage. The Cliff Dam would replace the Horseshoe Dam. The water level elevation based on the additional CAP storage would be 1,991 feet. The flood control level would be 2,043 feet with the crest at 2,090 feet.

Concept II: Salt and Verde Control - Under this concept, control of both the Verde and Salt Rivers would be obtained through construction of a single structure at the Verde/Salt confluence or a combination of two structures, one on each river. Should the Cliff Dam be selected as one of the structures, it would be designed multi-purposed including flood control and regulatory storage. The Cliff Dam

1/ FACTBOOK, Public Forums, November-December, 1980, Central Arizona Water Control Study, No. 271-0915.

would replace the Horseshoe Dam. The water level elevation for CAP storage would be 1,983 feet. The flood control level would be 2,062 feet with the crest at 2,110 feet.

The CAWCS is currently entering Stage III of the study process. The construction of the Cliff Dam is still a viable alternative under both Concepts I & II.

In summary, it should be noted that neither of the two dams will back water into the Sheep Bridge - Tangle Creek area except during periods of extreme flooding. When this occurs, it will be for very short periods.

#### Relationship Between Safety of Dams and CAWCS

The Inflow Design Floods (IDF) <sup>2/</sup> for the Salt and Verde Rivers were recently reanalyzed. The figures changed dramatically. The new Inflow Design Floods currently being considered are nearly triple the old ones.

The importance of this new standard is that if the Inflow Design Floods were to occur, the dams along the Salt and Verde Rivers would be overtopped by 10-23 feet. As the dams are now, a safety problem would occur long before the IDF level is reached. A study is currently underway to determine what actions can and should be taken.

In one sense, the Safety of Dams study and the CAWCS are completely separate studies. But it is also clear that they are closely inter-related since they might potentially involve the same structure. If, for example, a new dam on the Verde River for flood control and regulatory storage were constructed, it could eliminate the safety danger to Bartlett and downstream development.

Unfortunately, the two programs are not on the same time schedule. Waiting for the Safety of Dams information could delay the Central Arizona Water Control Study three to four months; and as it is, many people are already upset with the length of time involved. Instead, the possibility of Safety of Dam solutions has been taken into consideration in the alternative systems that have been developed in Stage II of CAWCS. In addition, some systems may be carried forward into Stage III which would have been eliminated if only regulatory storage and flood control were factors.

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<sup>2/</sup> Inflow Design Floods (IDF) is a standard set for the amount of water which a dam can withstand either by containing it or passing it on downstream. The standard is established by computing the maximum possible runoff, in peak flow, that could ever occur in the watershed under extreme climatological and meteorological conditions.

## Verde River Flood Control Project

In 1980, Yavapai County requested the Arizona Department of Water Resources to explore the possibility of constructing a flood control dam in the general vicinity of where Sycamore Creek joins the Verde River north of Clarkdale. The study is currently being conducted by Cella Barr and Evans and Associates of Tucson, Arizona.

The report has not been released. However, preliminary information indicates the construction of a dam at that location may not be feasible due to economics.

## Potential Waterpower and Reservoir Sites

The U.S. Department of Interior, Geological Survey provided the following information concerning potential waterpower and reservoir sites in the study area. The responsible local authorities have provided assurance that all but one of the proposals are inactive. The one exception is the Clarkdale reservoir site discussed under Verde River Flood Control Project.

Clarkdale reservoir site was studied by the Bureau of Reclamation. A 240-foot-high dam located on the Verde River in Section 17, T17N, R3E, G&SRM, would provide a storage capacity of 150,000 acre-feet at a water surface altitude of 3,775 feet. The reservoir would inundate portions of land in unsurveyed Sections 2 to 5, inclusive, and 9 to 13, inclusive, T17N, R2E, Sections 32, 34, and 35, T18N, R2E, and Sections 7 and 8, and unsurveyed Sections 17 and 18, T17N, R3E, G&SRM.

Gittings waterpower site was studied by the Geological Survey. A 200-foot-high dam located on the Verde River in Section 28, T17N, R3E, G&SRM, would provide a storage capacity of 100,000 acre-feet at a water surface altitude of 3,635 feet. The reservoir would inundate portions of land in unsurveyed Sections 2, 3, 11, 12, and 13, T17N, R2E, and Sections 7, 8, 16, 21, 22, 27, and 28, and unsurveyed Sections 17, 18, and 20, T17N, R3E, G&SRM. This site has a potential installed capacity of 2.7 MW.

Camp Verde waterpower site was studied by the Geological Survey. A 210-foot-high dam located on the Verde River in unsurveyed Section 1, T12N, R5E, G&SRM, would provide a storage capacity of 478,000 acre-feet. The reservoir would inundate land along the Verde River below an altitude of 3,100 feet in Sections 13, 24, and 25, T14N, R4E, unsurveyed Sections 1, 2, and 3, T12N, R5E, Sections 5 to 9, inclusive, Sections 16, 17, 20, 21, 22, 26, 27, and 28, and Sections 33 to 36, inclusive, T13N, R5E, and Sections 29 to

32, inclusive, T14N, R5E, G&SRM. This site has a power potential of 6.9 MW.

Arizona Hydraulic Power Company waterpower project would consist of a storage reservoir, diversion dam, two conduits, and three powerhouses. A 165-foot-high dam located on the Verde River in unsurveyed Section 30, T12N, R6E, G&SRM, would provide a storage capacity of 35,660 acre-feet at a water surface altitude of 2,900 feet. The reservoir would inundate land along the Verde River in unsurveyed Sections 1, 2, 11, 12, 13, 14, and 25, T12N, R5E, unsurveyed Section 36, T12 1/2 N, R5E, and unsurveyed Sections 6, 7, 19, and 30, T12N, R6E, G&SRM. Powerplant No. 3 would be located directly below the storage dam. Powerplant No. 1 would consist of a 20-foot-high diversion dam located on the Verde River in unsurveyed Section 14, T11N, R6E, G&SRM, a 21,084-foot-long conduit, and a powerhouse located in unsurveyed Section 36, T11N, R6E, G&SRM. A 36,000-foot-long conduit would lead from the tail race of Powerplant No. 1 to Powerplant No. 2 located in unsurveyed Section 34, T10N, R6E, G&SRM. This waterpower development has a potential capacity of 6.4 MW.

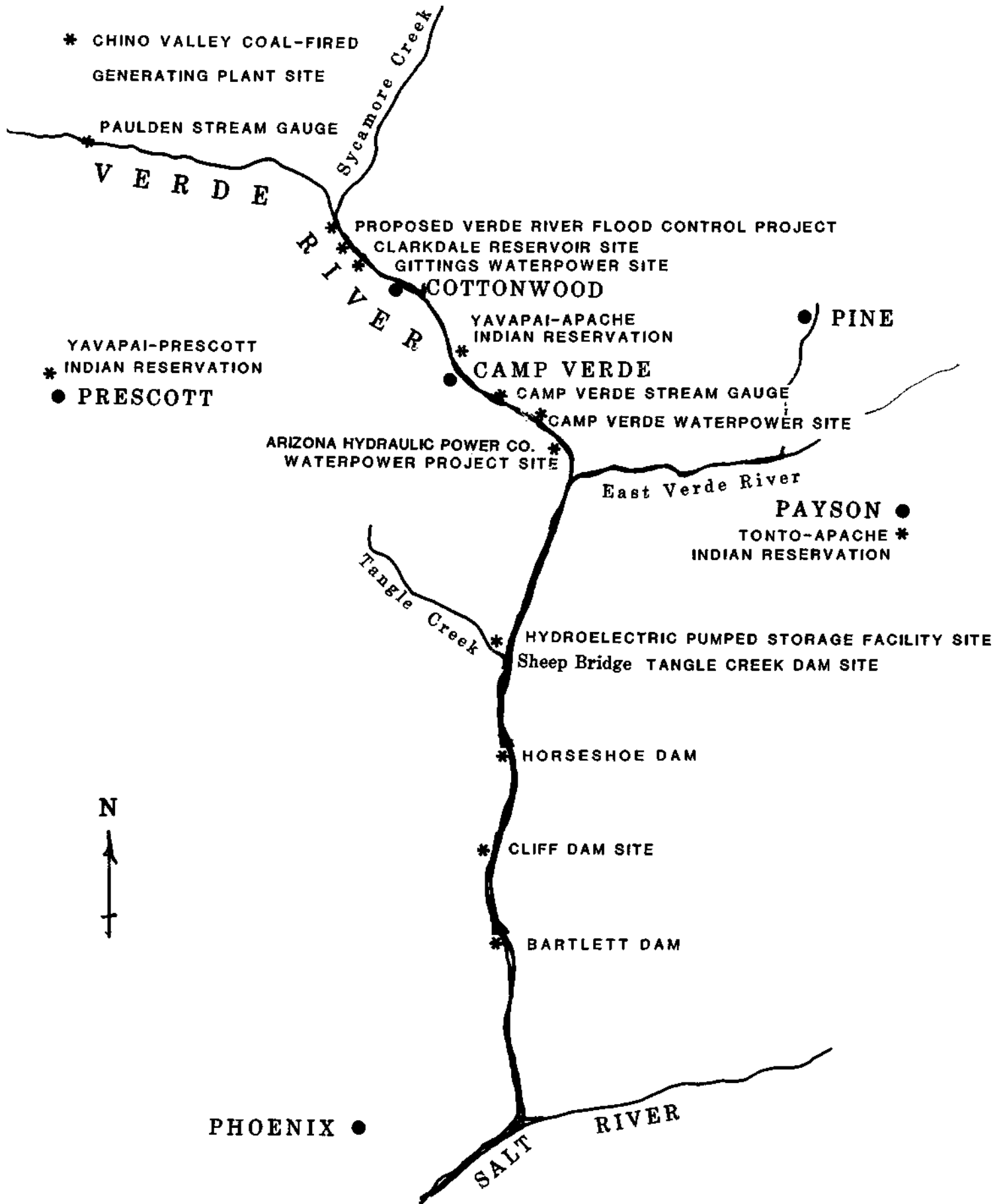
#### Other Proposals

The following proposals are not located within the study area; however, they could have an effect on designation.

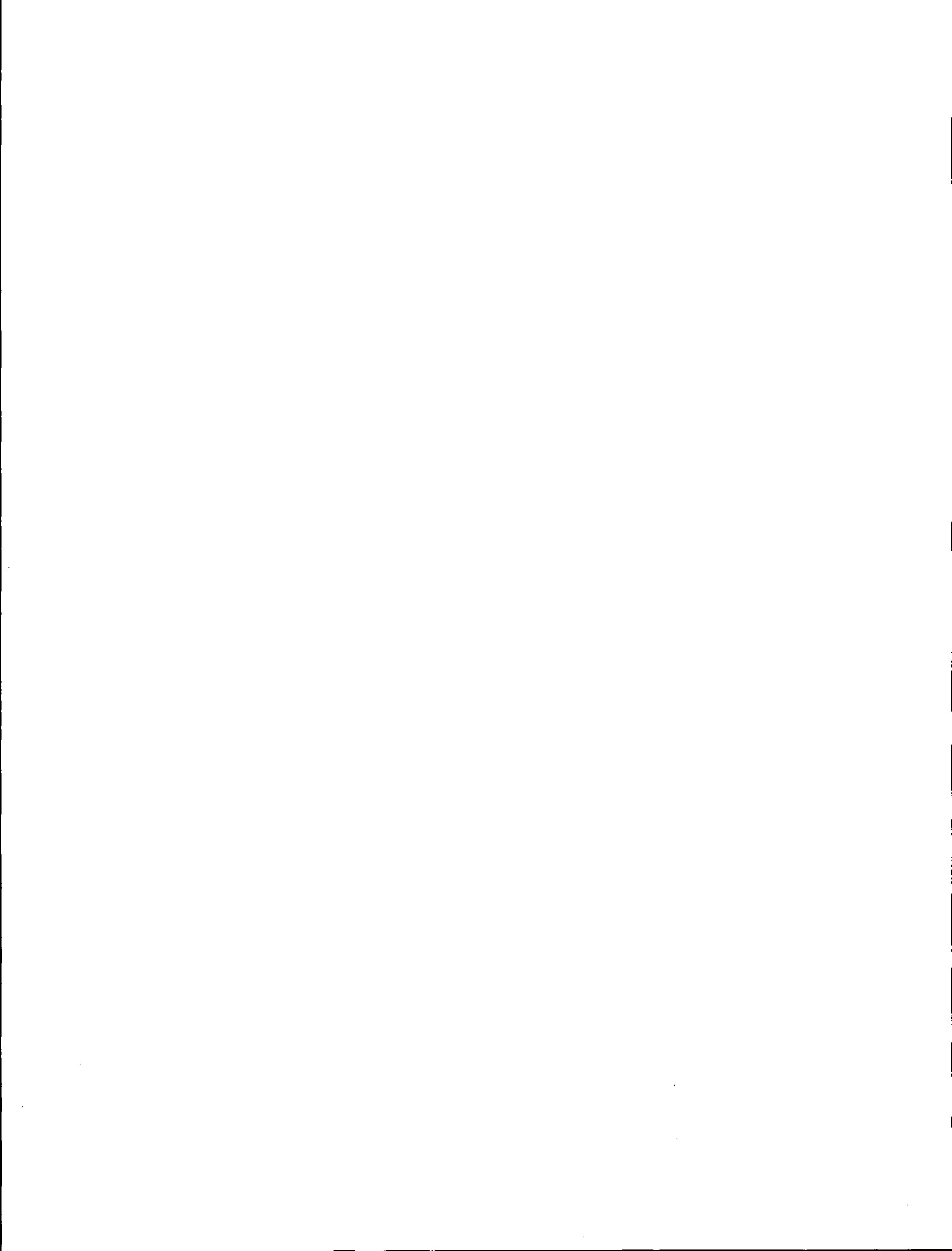
Chino Valley Coal-fired Generating Plant site is located in or near Big Chino Wash, which is a major tributary to the Verde River (Sections 26 and 27, T19N, R4W, G&SRM). A power plant requires water source - in this instance, groundwater. The Verde River headwaters are primarily fed by springs that are thought to result from a groundwater aquifer which underlies Big Chino Wash. Groundwater pumping would probably have a noticeable effect on Verde River flows especially in the north portion of study Segment A.

The possibility of developing the coal-fired plant was brought to our attention by Salt River Project (SRP) in a letter dated July 31, 1979. To our knowledge, no action is currently being taken on the proposal.

Verde River/Tangle Creek Confluence Potential Hydroelectric Pumped Storage Facility Site was identified in 1978 by Salt River Project (SRP). The site was dropped from consideration late in 1978 when on-site geological studies showed the area to be unsuitable for construction of either a dam or the necessary underground facilities. The findings were substantiated by the Central Arizona Water Control Study recommendations that the area be dropped as an alternative dam site because of unsuitable geology. SRP indicated the pump storage proposal is probably dead for this entire river area; however, they further stated that other sites probably could be found that are suitable for smaller flood control structures.



FLOOD CONTROL/HYDROELECTRIC MAP





APPENDIX D

Central Arizona Project (CAP)

The Central Arizona Project will bring water to Phoenix, and eventually to Tucson, via aqueducts from the Colorado River. Since a number of states are dependent on water from the Colorado River, the amount of water which can be taken from the river under normal conditions is strictly prescribed by law. However, at times extra water is available when the Colorado River reservoirs are essentially full or spilling. During these periods, CAP would be able to withdraw water.

As stated on page 22 of this report, northern Arizona communities, including Indian tribes located along the Verde River, have been tentatively granted a share of CAP water. It is likely that this allocation of CAP water will be effectuated through water exchanges with the Salt River Project (SRP). 2/

On August 8, 1980, the Secretary of the Interior made proposed allocations of CAP water for Indian use. The proposed allocations included three tribes which could take water from the Upper Verde or its tributaries:

Yavapai-Prescott-----	500 acre-feet per year
Yavapai-Apache (Camp Verde)-----	1,200 acre-feet per year
Tonto-Apache-----	110 acre-feet per year

In addition, the Arizona Water Commission (AWC) in 1977 recommended that the Secretary of the Interior allocate CAP water to five municipal entities along the Upper Verde River. Prescott, Cottonwood and Camp Verde could divert water directly from the Verde River above or in the study area. The other two (Pine and Payson) could divert water from the East Verde or its tributary, Pine Creek. The AWC recommendations are currently being revised, but the October 1980 Department of Water Resources staff recommendations for the five municipalities increase from an aggregate of 4,533 acre-feet per year in 1985 to 18,396 acre-feet per year in 2034.

It is proposed by the Water and Power Resources Services that the city of Prescott and Yavapai-Prescott tribe receive up to 8,859 acre-feet of water by year 2084. This could be diverted directly from the river considering the minimum average daily flow at the Paulden stream gauge 2/ is 15 cubic feet per second (see page 21 of report). The average

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1/ United States Department of Interior, Water and Power Resources Services letter dated November 18, 1980.

2/ See Flood Control/Hydroelectric map in Appendix C for location of stream gauges.

daily diversion rate would be over 12 cubic feet per second. This could result in removal of approximately 80 percent of the water which would elevate stream temperature and reduce the saturated level for dissolved oxygen. The continual diversion would have a significant adverse effect on downstream fisheries.

The existence of a reservoir site along the upper reaches of the Verde River to serve Prescott area is a probability. The size of the storage facility would depend on the needed delivery method and the schedule of water use. It is possible to design a reservoir that would collect water during peak flows, deliver it when needed for domestic and agricultural purposes and provide for a water release that would support downstream fisheries.

The proposed CAP allocation for Camp Verde area is approximately 5036 acre-feet of water by year 2034. To provide this amount of water, a direct diversion of over seven cubic feet per second would be required daily. It is doubtful that the water will be available for direct diversion considering the recorded minimum flow at the gauging station below Camp Verde is 13 cubic feet per second and Prescott area's diversion would be located upstream. A high percentage of the water that passes through the Camp Verde gauge is seepage back into the river from irrigation use. It is obvious that if the CAP water is to be used during the growing season (five-to-six-month period), the demand would be over 14 cubic feet per second and require some type of water storage facility.

The Pine-Payson area diversions from East Verde or its tributary, Pine Creek, could be made with minimum impacts on the flow in the Verde River. It would be desirable to specify a minimum flow between the Camp Verde area diversions and the confluence of East Verde with the Verde River to maintain the existing fisheries and riparian habitat.

In summary, it appears that some type of reservoir in River Segment A would be needed to provide the proposed CAP/SRP water to the Verde Valley area during the active irrigation period. The facility could be designed to meet both the Prescott area and Camp Verde area needs and at the same time maintain the free-flowing characteristics of River Segment B.

APPENDIX E

List of Preparers

Portions of this study were prepared by the Statewide Rivers Coordinating Team. The members were:

James F. Rathbun, Regional Coordinator, R-3  
Philip M. Gilman, Statewide Coordinator, Tonto National Forest  
Arthur H. Clinchy, Public Information Officer, Tonto National Forest  
Charles L. Redding, Recreation and Lands Staff, Apache-Sitgreaves National Forest  
Vearl Haynes, Land Management Planner, Apache-Sitgreaves National Forest  
H. Dewayne Morgan, Land Management Planner, Prescott National Forest  
Richard M. Harris, Lands Staff, Coconino National Forest

The Interdisciplinary Team members for the Verde River Study are:

H. Dewayne Morgan, (Team Leader), Forester, Prescott National Forest  
Philip M. Gilman, (Member), Land Management Planner, Tonto National Forest  
Richard M. Harris, (Member), Lands Staff, Coconino National Forest

Specific input and/or review for the study was provided by the following:

Washington Office

Charles R. Hartgraves, Director, Land Management Planning  
Roy W. Feuchter, Director, Recreation Management  
Robert H. Tracy, Director, Watershed Management  
Melvin L. Yuhas, Acting Director, Lands  
Douglas W. Shenkyr, Land Management Planning

Regional Office

Donald A. Renton, Director, Land Management Planning  
William D. Zeedyk, Director, Wildlife Management  
Don D. Seaman, Director, Range Management  
Stanley Randall, Program Planning and Budget

Prescott National Forest

Donald H. Bolander, Forest Supervisor  
Emilio Lujan, District Ranger, Chino Ranger District  
Richard Rhea, District Ranger, Verde Ranger District  
Charles Snyder, Forest Engineer  
Thomas Dix, Fire, Timber, and Watershed Staff  
John Bohning, Range and Wildlife Staff  
Bruce Lamb, Recreation and Lands Staff  
Robert Anderson, Hydrologist

Prescott National Forest(Continued)

Carl Frounfelker, Wildlife Biologist  
Neil Dickey, Geologist  
Harlow Yaeger, Para-professional Archeologist  
James Shores, Forester  
Donald Ranne, Forester  
Vernon Laney, Range Technician

Coconino National Forest

Michael A. Kerrick, Forest Supervisor  
Robert Gillis, District Ranger, Sedona Ranger District  
Don Howard, District Ranger, Beaver Creek Ranger District  
Jack Utley, Timber Staff  
Loyd Barnett, Watershed and Soils Staff  
Don Freeman, Recreation and Lands Staff  
Bill Buck, Fire Staff  
Marlin Johnson, Land Management Planner  
Gerald Mundell, Range and Wildlife Staff  
Jerry McConnell, Forest Engineer  
Peter Pilles, Archeologist  
Thomas Holden, Landscape Architect  
Bill Norrid, College Student  
Gary Bell, Fisheries Biologist  
Patrick Jackson, Hydrologist  
Howard Hudak, Wildlife Biologist

Tonto National Forest

James L. Kimball, Forest Supervisor  
Gerald Tower, District Ranger, Cave Creek Ranger District  
Hugh Thompson, District Ranger, Payson Ranger District  
William Pint, Range and Wildlife Staff  
Walter Taylor, Recreation and Land Staff  
Ernest McCrary, Watershed, Timber, and Fire Staff  
Larry Forbis, Wildlife Biologist  
Jerry Davis, Wildlife Biologist  
Gary Holder, Range Conservationist  
Rich Martin, Hydrologist  
Ted Oliver, Landscape Architect  
Scott Wood, Archeologist

APPENDIX F

PUBLIC COMMENTS ON THE DRAFT ENVIRONMENTAL STATEMENT  
AND FOREST SERVICE RESPONSE

Written comments on the Draft Environmental Statement were separated by Alternative Preference. Each alternative section is organized as follows:

1. Names and locations of respondents
  - a. State agency
  - b. County
  - c. City
  - d. Organization
  - e. Corporation
  - f. Congressional Delegates
  - g. Individuals
2. Letters that need a response
3. Example letters that do not need a response\*

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Alternative C.....	F-115
Alternative D.....	F-128
Alternative C or D Plus 10.5 Tangle Creek Section.....	F-133
Alternative Preference Unknown.....	F-142

\*Due to the large number of responses received, it was decided to summarize the contents in Section VII, pages 72 through 79. Only those responses that require Forest Service comment and letters from Federal, State, and County organizations and Congressional delegates are reproduced in this appendix.

Alternative A (Oppose Designation)

Arizona State Land Department

Gila County Board of Supervisors

Verde Natural Resource Conservation District

Coconino Natural Resource Conservation District

Phelps Dodge Corporation

Dashney, Steele & Jensen, Inc., Consulting Engineers

Congressman Bob Stump

Karen Tavasci, Clarkdale 86324	Clarence Finch, Camp Verde 86322
Jim Bergstrom, Cottonwood 86326	William Jik, Sedona 86336
Joe Harrcock, Cottonwood 86326	William Thompson, Dewey 86327
Mr. & Mrs. Jay Roseberry, Thatcher	Lois Hall, Camp Verde 86322
Hans Odelberg, Camp Verde 86322	Merlyn Talbot, Camp Verde 86322
A. J. Mackey, Camp Verde 86322	Florence Mackey, Camp Verde 86322
Harold Avery, Camp Verde 86322	W. P. Meyer, Lake Montezuma 86432
Herschel Lewis, Lake Montezuma	Betty Lewis, Lake Montezuma 86432
James Sheltrow, Lake Montezuma	Neil Landers (no town)
Mr./Mrs. O.D. Arrowsmith, Mesa 85203	Mike Foree (no town)
Jo Thomson, Sun Lakes	William Foree (no town)
Frank Macek, Sun City 85375	Edwin Wangberg, Sun City 85375
Marlin Ranck, Lake Montezuma 86342	Larry Biller, Lake Montezuma
Cleo Tissaw, Cottonwood 86326	Mr./Mrs. Geo. Tissaw, Cottonwood
Jerry Torstveit, Phoenix 85006	Betty Foree, Tempe 85283
J. L. Varga, Sun City 85351	Warren Carlson, Cottonwood 86326
Doyt Hirl, Camp Verde 86322	Lorene Weed, Camp Verde 86322
Mrs. R. E. Hargus, Camp Verde	Kelly Dunham, Prescott 86301
Diana Ward, Camp Verde 86322	Pete Peterson, Prescott 86301
Paul Webb, Rimrock 86335	Virginia Webb, Rimrock 86335
Imogene Heiskell, Camp Verde	Bud Teoque, Camp Verde 86322
Phyllis Teoque, Camp Verde	Gene Hollamon, Camp Verde 86322
Evelyn Renner, Cottonwood	Paul Renner, Cottonwood 86326
Teri Owen, Camp Verde 86322	O. E. Gonzales, Camp Verde 86322
Florence Gonzales, Camp Verde	Mary Denletman, Cottonwood 86326
W. J. Raithel, Scottsdale	Henry Skill, Lake Montezuma 86342
Shirley Barnes, Camp Verde	Joe Neff, Camp Verde 86322
Betty Lovett, Camp Verde 86322	Craig Lacey, Camp Verde 86322
Marjorie Lacey, Camp Verde	W. F. Lacey, Camp Verde 86322
Anna Sawers, Camp Verde 86322	Paul Sawers, Camp Verde 86322
Loft Hollamon, Camp Verde	Dewayne Barnes, Camp Verde 86322
Harold Friedman, Camp Verde	Pat Friedman, Camp Verde 86322
Mr./Mrs. Lester Boren, Camp Verde	Dolly Bliss, Camp Verde 86322

Alternative A

Virginia Zellnes, Camp Verde  
Bob Barkes, Camp Verde 86322  
Harold Callahan, Camp Verde  
Wayne Liuth, Camp Verde  
Dr./Mrs. J.F. Moon, Tucson 85719  
Wayne Greer, Camp Verde 86322  
Mrs. C.L. Aston, Cottonwood  
James Giles, Sedona 86336  
Dorothy Carlson, Cottonwood  
Mr./Mrs. Wm. Moore, Camp Verde  
Elaine Lee, Camp Verde  
Minnie Maeck, Camp Verde  
Kenneth Wade, Cottonwood 86326  
Marion Moon, Sun City 85375  
Gary Hall, Tempe 85282  
Valerie Harroun, Mesa 85202  
Robert Harrow, Mesa 85202  
Glenora Hackett, Cottonwood  
Charles Mead, Cottonwood 86326  
Carroll Dintelman, Cottonwood  
Gary Green, Phoenix 85021  
K. A. Green, Phoenix 85021  
Mike & Wanda Purinton, Camp Verde  
Wilson Eldridge, Sun City 85375  
Jim French, Camp Verde 86322  
Leonard Staff, Tempe 85282  
Nook & Donna Scott, Phoenix, 85031  
Mr./Mrs. W. Miller, Camp Verde  
Arnold Abbey, Camp Verde  
Harry McCracken, Camp Verde  
Mona & Norman Rask, Camp Verde  
Charles Pettijohn, Camp Verde  
O.J. Blewer, Camp Verde  
Candace Murdock, Camp Verde  
Bob Jackman, Prescott 86301  
Elizabeth Tedford, Rimrock  
Rosa Gates, Camp Verde  
Allen Owen, Camp Verde  
Mr./Mrs. David Wallin, Camp Verde  
J. H. Scroggins, Cottonwood 86326  
Betty Scroggins, Cottonwood  
Arthur Holmgren, Cottonwood  
Clinton Self, Cottonwood  
F. D. Dosips, Cottonwood  
Inez Neff, Camp Verde  
A. E. Mahan, Cottonwood  
Wilfred Kinch, Cottonwood  
Mr./Mrs. Donald Scarsdale, Phoenix 85019  
Mrs. Lyle, Price, Cottonwood  
Joe Kinnelbieu, Cottonwood  
David Gipe, Yuma 85364  
Imogene Callahan, Camp Verde  
Jon Huskell, Camp Verde 86322  
Melanie Myers, Camp Verde  
Doris Inman, Cottonwood 86326  
Don & Fran Murdock, Camp Verde  
Thelma Giles, Sedona 86336  
Theodore Morris, Camp Verde  
Mr./Mrs. S.J. Steven, Sedona  
Randi Campbell, Fredonia 86022  
Johnny Lee, Camp Verde  
Russell & Dorothy Felton, Camp Verde  
Mary Ann Hokes, Camp Verde  
John W. Moon, Sun City 85375  
Carole Kelley, Phoenix  
Mr./Mrs. Walt Jenkins, Phoenix 85029  
Robert Haugh, Camp Verde  
Myrtle Mead, Cottonwood 86326  
Nels Peterson, Cottonwood 86326  
Geo. W. Tignor, Cornville 86325  
Henry Simonsgaard, Cornville 86325  
Henry Golla, Scottsdale 85254  
Gene Bullock, Mesa 85201  
Janet Eldridge, Sun City 85375  
Amy Mihailow, Mesa 85207  
Gordon & Joan Huffaker, Page 86040  
Elizabeth Foree, Mesa 85201  
Irma Johnson, Camp Verde  
Jesse Reeves, Camp Verde  
Dwight Reeves, Camp Verde  
Lavonna McCracken, Camp Verde  
Laura Blewer, Camp Verde  
E. Jodek, Camp Verde  
Steve Murdock, Camp Verde  
Truman Hall, Camp Verde  
William Gates, Camp Verde  
Jeff Dutt, Camp Verde  
Morgan Harper, Camp Verde  
John Edge, Camp Verde  
Darvin & Vivian Weitcamp, Camp Verde  
Mrs. S.E. Gerken, Cottonwood 86326  
Ralph Blackburn, Cottonwood  
Nancy Self, Cottonwood  
J. R. Stevenson, Cottonwood  
Dave Perkins, Clarkdale 86324  
O.H. McDaniel, Cottonwood  
Ruth Harvel, Camp Verde  
L.R. Nickerson, Cottonwood



Arizona  
State Land Department

1434 WEST ADAMS  
PHOENIX, ARIZONA 85007  
602-255-4634



November 19, 1980

USDA - Forest Service  
Prescott National Forest  
P.O. Box 2549  
Prescott, AZ 86302

Gentlemen:

In regard to your recent draft on the "Verde River Environmental Statement and Wild and Scenic River Study", we wish to make the following comments and observations:

- 1) As noted, the Verde River watershed has been petitioned for adjudication under the jurisdiction of the State of Arizona Superior Court (Maricopa County). The statement in the report that certain "water rights were lost and the right to divert forfeited", is questionable, since such findings of fact can only be determined by a court of law within the context of the adjudication process.
- 2) The statement, "...since Salt River Project presently claims most of the water, it is doubtful that any additional diversions will occur", is misleading since the State of Arizona, through the State Land Department, has claims to water rights on the Verde River watershed which have not as yet been determined or quantified. Designation of any portion of the river as "wild and scenic" could adversely impact those claims prior to the adjudication.
- 3) Since the report states that "it is impossible to determine what effect this (CAP) exchange of water rights will have on the river", we question how an appropriate evaluation of the impact of a wild and scenic river designation on water rights and uses can be made at this time.

In summary, it would appear that the proposed designation of the Verde river, or any portion thereof, as a wild and scenic river is premature at this time. Until this watershed has been adjudicated, and the water rights of the State of Arizona, including claims to CAP water, been fixed by court decree, the State Land Department must protest any proposal which may adversely impact the claims of the State.

Your consideration in this matter is appreciated.

Sincerely,

Joe T. Fallini  
State Land Commissioner

157-D 3-3-A

Forest Service Response to Arizona State Land Department's Comments:

1. The statement "other diversions have been made in the past, but through non-use, water rights were lost and the right to divert forfeited" was deleted on page 21.
2. The statement "However, since Salt River Project presently claims most of the water, it is doubtful that any additional diversions will occur" was deleted on page 22.
3. We agree that it is impossible to determine what effects a possible CAP exchange of water rights would have on the Verde River. Until such time the actual allocations have been made and delivery methods determined, we can only speculate as to the possible results. See the section on Central Arizona Project (CAP) in Appendix U.

11-24-80

Prescott National Forest Supervisor  
PO Box 2549  
Prescott, AZ 86302

Dear Mr. Bolander,

I am strongly in support of Alternative A, calling for leaving the river and its tributaries as they are now. Present regulations are adequate.

Further regulations would alter the rights of local citizens by forbidding the development of any type of industry or the right to maintain existing activities such as agriculture and cattle raising.

A government agency established for the enforcement of further regulations would be costly to taxpayers and would not be a benefit to local citizens.

I am in support of Alternative A.

Sincerely,

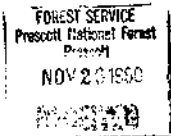
F. D. Dobyas

Property owner

Forest Service Response to F.D. Dobyas' comments:

New developments that are not compatible with the Wild and Scenic River designation would be prohibited, however, designation would not affect existing activities such as agriculture and cattle raising.





GARY A. DASHNEY, P.E.  
 TRAVIS C. STEELE, P.E.  
 LYNN H. JENSEN, R.L.S.

Dashnev, Steele & Jensen, Inc., Consulting Engineers

Mr. Tolson	
Mr. DeLoach	
Mr. Mohr	
Mr. Bishop	
Mr. Casper	
Mr. Callahan	
Mr. Conrad	
Mr. Felt	
Mr. Gale	
Mr. Rosen	
Mr. Sullivan	
Mr. Tavel	
Mr. Trotter	
Tele. Room	
Miss Holmes	
Miss Gandy	
Mr. [unclear]	
Mr. [unclear]	
Mr. [unclear]	
Mr. [unclear]	
Mr. [unclear]	
Mr. [unclear]	
Mr. [unclear]	
Mr. [unclear]	
Mr. [unclear]	
Mr. [unclear]	
Mr. [unclear]	
Mr. [unclear]	
Mr. [unclear]	
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Mr. [unclear]	
Mr. [unclear]	
Mr. [unclear]	
Mr. [unclear]	
Mr. [unclear]	
Mr. [unclear]	
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Mr. [unclear]	
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Mr. [unclear]	
Mr. [unclear]	

Page 2.

- 7. Failure to accommodate for this future need carries all of the same ramifications and implications as outlined in our Salt River report. We urge you to heed all of the precautionary statements stressed in this report prior to making a decision which could eliminate viable alternatives to an even greater problem to the people of central Arizona.
- 8. We therefore highly recommend the postponement of any decision on designation of any portion of the Verde River until the full flood control needs concerning the upper watershed of the Verde River can be assessed. Areas further upstream from the aforementioned area such as Camp Verde to Cottonwood may also require such facilities.

Sincerely yours,

*Phillip Anderson*  
 Phillip Anderson, Geologist

*Gary A. Dashney*  
 Gary A. Dashney, Civil Engineer

November 22, 1980

Mr. Donald H. Bolander  
 Forest Supervisor  
 Prescott National Forest  
 P.O. Box 2549  
 Prescott, Arizona 86302

Dear Mr. Bolander:

In response to the Verde River Draft Environmental Statement & Wild & Scenic River Study, we are submitting our recent report on the Salt River study since we feel that all of the contents are applicable in principle to the Verde River study. We see the following differences in the two areas under study:

- 1. Due to the fact that a greater portion of the Verde River is accessible to a greater number of Recreation seekers than the proposed study reach of the Salt River, we recognize need for a higher level of environmental protection of river qualities on parts of the river.
- 2. However, Horseshoe and Bartlett storage dams were not designed for flood control in their original concept and consequently they would be very prone to overflow with possible failure during a major flood condition and therefore must be protected from this potential catastrophe.
- 3. To safeguard the above event from occurring, a flood control dam would be required somewhere on the Verde River between the Childs Power Plant and approximately one mile below the junction at the East Verde.
- 4. The major reason for the uncertainty in the location for a flood control dam on the Verde River in this general location is that there is not an ideally situated dam site with good geologic and engineering qualities. Additionally, contribution from Fossil Creek needs to be better assessed.
- 5. Nevertheless, large flows from the Verde River watershed and the great potential of flows from a major event (100-500 year frequency storm) necessitates a flood control dam at some point along this portion of the Verde River located in the upper watershed area.
- 6. Therefore, this portion of the Verde River must remain withdrawn at all costs for the purposes of future flood control facilities, at least until all study of the area for such facilities has been exhausted.

Forest Service Response to Dashnev, Steele & Jensen, Inc., Consulting Engineers' comments:

We have discussed your concerns with the Corp of Engineers, Water and Power Resources Service and Central Arizona Water Control Study (CAWCS) personnel. There seems to be general agreement that some type of flood control measures are needed to protect the Phoenix Valley. However, there appears to be several more viable options to control the flood waters than to construct a dam above Horseshoe Reservoir. See the November-December Central Arizona Water Control Study Factbook No. 271-0915.

Concerning the safety of Horseshoe Dam, we have been told that it is usually more economical to modify the existing dam or take other action rather than construct a new dam upstream. The Cliff Dam, which is the only proposal being considered for the Lower Verde River at this time (CAWCS), takes into consideration the safety of Horseshoe Dam to the extent the existing earthen dam would be breached. The water currently being stored for SRP purposes would be held in the now Cliff Reservoir. See CAWCS section in Appendix C.

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CLAB

JEKEL & HOWARD  
ATTORNEYS AT LAW  
4322 NORTH BROWN AVENUE SUITE E TELEPHONE AREA 604 5588  
SCOTTSDALE, ARIZONA 85251

LOUIS W. JEKEL  
ROBERT G. HOWARD, JR.  
BARBARA J. ROSS

POSITION STATEMENT OF DR. AND MRS. JOHN W. MOON

November 28, 1980

Mr. H. Dewayne Morgan  
Forest Planner  
Prescott National Forest  
P.O. Box 2549  
Prescott, Arizona 86302

RE: Verde River Draft Environmental Statement and  
Wild and Scenic River Study

Dear Mr. Morgan:

Enclosed please find our Position Statement prepared  
on behalf of Dr. and Mrs. John W. Moon, owners of Brown  
Springs Ranch, Yavapai County, Arizona. This Position  
Statement has been prepared by our firm in response to the  
subject Draft Statement and River Study.

Please direct any comments or inquiry regarding the  
enclosed Position Statement to the undersigned.

Sincerely yours,

JEKEL & HOWARD  
Attorneys at Law

*Barbara J. Ross*  
Barbara J. Ross  
For the firm

BJR/br  
Enclosure

cc: Dr. and Mrs. John W. Moon with enclosures

This statement is prepared in response to the Draft  
Environmental Impact Statement on the Verde River. We pro-  
pose that this statement contains assumptions and conclusions  
that have no basis in fact, or were arrived at based upon in-  
complete data and review techniques that should be thoroughly  
re-examined before a final draft of the statement is published.  
Specifically, the information and analysis presented in this  
statement do not adequately support the conclusion that Alter-  
native C is the preferable alternative. Further, selection of  
Alternative C does not advance the purpose of The Wild and  
Scenic Rivers Act, under which authorization for the preparation  
and publication of this statement is prescribed. Therefore,  
it is our position and recommendation that more detailed and  
thorough data be gathered and included in the statement re-  
garding the impact of this proposed alternatives in the state-  
ment on the riparian habitat in the designated section of  
the Verde River that is the subject of this study. We believe  
such a review and analysis will show that Alternative A should  
be designated as the preferred alternative in the final draft  
of the Environmental Statement submitted to Congress.

THE WILD AND SCENIC RIVERS ACT

The purpose of The Wild and Scenic Rivers Act of 1968  
is to institute a National Wild and Scenic Rivers System "to  
preserve selected rivers or sections thereof in their free-  
flowing condition, to protect the water quality of such rivers  
and to fulfill other vital national conservation purposes."

The Act further provided that the National Wild and  
Scenic Rivers System shall be comprised of rivers:

1. Authorized for inclusion by Act of Congress;
2. Designated by an act of legislature in the state  
or states through which the river flows that are  
found by the Secretary of the Interior, upon ap-  
plication to the Governor of the state or states  
concerned, to meet the criteria established in  
the Act.

A wild, scenic or recreational river area is eligible if it  
possesses one or more of the values described above in the  
purpose of this Act.

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In 1978, Section 5(a) of the Act, which prescribes rivers designated for potential inclusion in the National Wild and Scenic Rivers System, was amended to include the following paragraph:

"(63) VERDE, ARIZ. The main stem from the Prescott National Forest boundary near Paulden to the vicinity of Table Mountain, approximately 14 miles above Horseshoe Reservoir, except for the segment not included in the national forest between Clarkdale and Camp Verde, North segment."

Section 4 of the Act prescribes the procedure to be followed in analyzing whether the proposed river should be included in the National Wild and Scenic Rivers System.

"Each proposal shall be accompanied by a report, including maps and illustrations, showing among other things the area included within the proposal, the characteristics which make the area a worthy addition to the system, the current status of the landownership and use in the area, the reasonably foreseeable potential uses of the land and water which would be enhanced, foreclosed, or curtailed if the area were included in the national wild and scenic rivers system..." (emphasis added)

It is clearly the intention of Congress that the focus of the Draft Environment Statement of a river, or section of a river, proposed for designation into the National Wild and Scenic Rivers System should be how inclusion of the subject river or river section will further the purposes set forth in the Act as described hereinabove. The focus of this statement is not so directed.

The analysis and discussion of the impact of the preferred Alternative C on the wildlife and vegetation is cursory and shallow. It contains many statements and conclusions that are not documented and some that are even contradicted by the information contained in the statement. For example, from page 57 of the statement:

"Designation would enhance the habitat value of the river for the bald eagle and other threatened and endangered wildlife species by precluding further developments on private lands adjacent to the river."

① There is no documentation in the statement to support this conclusion that precluding development of the private land adjacent to the river will "enhance the habitat value of the river" for the bald eagle. Further, there is no evidence pre-

sented in the statement that would indicate that the privately owned lands in the designated section of the Verde River present any immediate danger to the riparian habitat. The only potential danger alleged is "future development", which is never defined or fully discussed anywhere in the statement.

② It is clearly a requirement under the Act that specific discussion and analysis of the potential uses of the land, the effect that use will likely have, and how the inclusion of the river will enhance, foreclose, or curtail such uses and the benefits derived therefrom be included. The statement does not adequately meet this requirement.

The paragraph cited above from page 57 of the statement continues as follows:

"Increased recreation use resulting from designation and recognition of boating opportunities of the river could reach a point where it adversely affects the nesting bald eagle and other wildlife species."

Throughout the statement, there are numerous allusions to the increased recreational use of the Verde River that will result from classification of the river, particularly under Alternative C. (See pages 38, 41, 42, 46, 47, 48, 54, 56, 57, 59, 60, 61, 63, 64, 65, 66, 67.) Particularly, from page 59 of the statement: "The designation of any part of the Verde River in the National Wild and Scenic Rivers System should increase recreational use".

Increased recreational use is not justification nor necessarily compatible and in furtherance of the purposes set forth under the Act which can compel inclusion of a proposed river or river section into the National Wild and Scenic Rivers System. In fact, as presented in the statement, increased recreational use of the designated area may adversely affect the preservation and conservation of a proposed area.

For example, in Appendix A of the statement it states that:

"Bald eagles require isolation from man's disturbing activities as well as riverine habitat for feeding and rearing young."  
Page A-1.

③ Even the drafters of the statement acknowledge that an increase in recreational activity will be damaging to the bald eagles and the riverine habitat as cited above. However, the only alternative proposed in the statement which would not increase recreational activity, Alternative A, was not selected as the preferred alternative.

#### THREATENED AND ENDANGERED SPECIES AND PLANTS

Another severe inadequacy of this statement is the lack of adequate research and investigation of the impact of the proposal on endangered and threatened species and plants in the designated section of the Verde River. Appendix A STATE AND FEDERALLY LISTED THREATENED AND ENDANGERED SPECIES and Appendix B THREATENED AND ENDANGERED PLANTS VERDE RIVER (sic) cite endangered and threatened species and plants that have been classified, but contain only cursory and in some cases no discussion of the impact on these cited species and plants this proposal may have. It is clear from the information presented in Appendix A and Appendix B that adequate information was not gathered and that therefore, a proper analysis of the impact on these endangered and threatened species and plants could not be done. The natural conclusion from this defect is that the impact on other species and plants not endangered or threatened were also not adequately researched and analyzed.

④

#### WATER RESOURCES PLANNING ACT

Another important consideration that must be discussed in the statement is the necessity of flood control on the Verde River. The National Wild and Scenic Rivers Act clearly states that:

"Every such study and plan shall be coordinated with any water resources planning involving the same river which is being conducted pursuant to the Water Resources Planning Act." (cite omitted)

There is no discussion of this important issue in the draft statement and its omission is a serious defect in the draft. Further, a discussion and analysis of the impact of flooding on the Verde River on the riparian habitat and other wildlife and vegetation in the designated section of the river is also omitted.

⑤

#### SECTION IV EVALUATION OF ALTERNATIVES

Section IV Evaluation of Alternatives of the statement is another important area in the proposal that does not receive adequate information and analysis. For example, under Criteria 4, page 64:

"In general, there seems to be support for designation of the Verde River into the National Wild and Scenic Rivers System..."

In fact, the only support appears to come from the Forest Service, which is the agency responsible for the preparation and publication of this statement, the Arizona Recreation Coordinating Commission and the Prescott City Council. Gila County, local ranching interests and at least 55% of local residents of Sedona, Jerome, and the Verde Valley are cited in the statement as indicating a preference for no designation (Alternative A). There are many other interested groups, i.e. the Maricopa Audubon Society who the statement indicates on page A-1 of Appendix A contacted the Forest Service and expressed their concern with threat of lawsuit, that the eagle habitat was not being adequately protected and managed", whose preference for designation or other comments were not included in the statement.

The method used by the drafters of the statement to determine support or non-support is not indicated. Actual comments submitted to the drafters should be included in the statement to indicate what public support exists for the designation. Further, actual numbers of residents and other interested people should be included rather than total percentages. The inclusion of this information and statistics are necessary to support a conclusionary statement such as the one cited above that appears in the statement.

⑥

#### CONCLUSION

This Position Statement contains specific challenges to the accuracy and adequacy of the information and analysis contained in the Draft Environment Impact Statement on the Verde River. It contains specific references to defects in the focus and scope of the statement which are not compatible and in furtherance of the purposes and procedures set forth in the National Wild and Scenic Rivers Act. Based on the information and challenges presented in this Position Statement, it is our recommendation that a more detailed and thorough investigation of the impact of the proposal on the riparian habitat and other wildlife and vegetation in the designated area be conducted; that a more detailed and thorough study be conducted of the reasonably foreseeable potential uses of the land and water which would be enhanced, foreclosed, or curtailed if the area is included in the National Wild and Scenic Rivers System; that this study be conducted as prescribed in the Act in coordination with any water resources planning being conducted pursuant to the Water Resources Planning Act. It is our position that such a detailed and

thorough investigation and analysis of these relevant issues will reveal that the most desirable alternative will be not to include the proposed section of the Verde River into the National Wild and Scenic Rivers System, but to let it remain under the control of the Prescott National Forest and the limited number of private landowners.

Forest Service Response to Dr. & Mrs. John W. Moon's Position Statement:

1. We agree that precluding development on private lands would not enhance the habitat value for the bald eagle and other threatened and endangered species. However, the control of developments through zoning or scenic easements would provide the opportunity to add constraints that would prevent adverse impacts on the existing habitat. The statement on page 57 of the document has been revised to reflect your concern.
2. Throughout the document, especially in Section IV, Effects of Implementation, an attempt was made to analyze and discuss the reasonably foreseeable potential uses of the land and water which would be enhanced, foreclosed or curtailed if the area were included in the National Wild and Scenic Rivers System. Please note the United States Environmental Protection Agency (EPA) has rated the Draft Environmental Impact Statement as adequate.
3. It has been acknowledged throughout the document that recreation use of the river would increase in the future. This would happen whether or not the river is designated into the National Wild and Scenic Rivers System. The driving force behind the increase is the current population trend and the need for water-based recreation. We also stated that an additional increase can be expected as the result of designation. It is obvious that at some point in time, if recreation use is not controlled, the riverine environment would start to deteriorate. The necessary controls would be prescribed in the management plan discussed on pages 69 and 70 of this document.
4. We agree that an in-depth study of both threatened and endangered wildlife and plant species along the Verde River would be desirable. However, in evaluating the proposal it was found that the only factor that could adversely affect either plants or wildlife was the slight increase in recreation use. The interdisciplinary team in consultation with wildlife biologists from the three National Forests involved decided that people pressure could be controlled through existing authority. Therefore, the discussions in this report were focused on the bald eagle, which is currently receiving management emphasis. Both Appendices A and B were revised as the results of public and agency comments.
5. We agree that flood control on the Verde River is of prime concern. See added Flood Control section in Appendix C.
6. Criterion 4 on page 64 has been revised to reflect your concern regarding designation support. Actual numbers of residents and other interested people, by preference, have been displayed in TABLES 10 and 11 on pages 73 and 74.

In 16 years old and ive  
been hunting and fishing on  
the river for a long time and  
so hes my dad and i think  
its pretty stupid you trying to  
tell me when to hunt and fish.  
Why dont you just leave it  
alone and go make a recreation  
area somewhere else

Signed

Steve Murdock

Forest Service Response to Steve Murdock's comments:

Steve:

The intent of including the river into the Wild and Scenic Rivers System is to keep it free-flowing and prevent dams and other structures that would remove water from the river. As you can see, without water there would be no fish and very few species of wildlife to hunt. Designation does not prevent hunting or fishing nor does it tell you where you can or cannot hunt or fish.

Should the river be designated as a Wild and Scenic River, the Forest Service will try to keep the stream and surrounding area like it is today. Young people like yourself will be able to continue enjoying the river values.

To: H. Dwayne Morgan, Forest Planner  
Prescott National Forest  
P.O. Box 2549, Prescott, Az. 86302

Comments and Discussion: Verde River Draft Environmental  
Study and Wild and Scenic River  
Study

By: Dr. and Mrs. John W. Moon  
13215 Pomegranate Drive  
Sun City West, Az. 85375

Owners: Brown Springs Ranch  
Yavapai County, Az.

The Draft Environmental Impact Statement on the Verde River (to be referred to as the Blue Book) was first brought to our attention in mid October, 1980. Although we are the only private property owners on Segment B of the Blue Book proposal, the Forest Service failed to notify us. Therefore, this is our first opportunity to comment. Our time for preparation of these comments has been short - too short to cover many of the topics before the November 24, 1980 cut-off date set by the Prescott National Forest. However, we have solicited information from (1) National Forest personnel; (2) the Salt River Project; (3) the Arizona Cattle Grower's Association; (4) the Audubon Society attorney, Richard Katz; (5) various individuals from Camp Verde and private landowners from Segment A, and (6) the Water and Power Resources Service. Because we have hiked, back-packed, camped and fished the Verde River from Beasley Flats to the East Verde's beginning and down to Horseshoe Dam, during all seasons of the year, we believe we are acquainted with the Verde River below Camp Verde. We have combined what we have learned from the above sources with our practical knowledge gained from living on the Verde River for over 20 years in preparing this statement.

We recommend that Alternative A be selected for the final draft to be prepared for submission to Congress in April of 1981.

- ① **Recommend:** A more detailed comment on the impact of an increase in dispersed recreational activity on wildlife.

**Discussion:** The Blue Book indicates the Forest Service plans to "increase the supply of outdoor recreation opportunities and services through Forest Service programs that emphasize dispersed recreation" (page 38). This is supported by the proposed budget figures allocating \$225,000 for development costs of recreation facilities and \$170,000 for costs of road development (page 51). Also during an interview Mr. Morgan, Planner stated that there would be a "large" increase in recreational use during the first few years. Mr. Rhea, Forest Ranger, estimated there would be a "300%" increase in use during the first few years. Use is then expected to gradually diminish. This increase in use will be produced by the advertising effect of including the Verde River into the System which will attract national attention.

The impact of increased recreation, motorized especially, but also dispersed, will be adverse upon the wildlife and especially the bald eagle. This is recognized by your statement on page 66. "River designation with the improved access would increase the number of recreation visitors. This increase could have an adverse impact on wildlife, specifically the nesting bald eagle . . ."

The efforts thus far have been to hide the eagles and down-play public attention to their location. The selection of Alternative C will reverse that effort. Brown Springs Road (FS#574) passes through an area of maximum interest to those people intent on preserving and improving their habitat. From personal observation we can state there has been a steady decrease in motor traffic on FS #574 over the past 20 years. It is surprising to us that an accurate count on motor, foot, horseback and boat traffic has not been done on this vital area. There never has been heavy traffic in the river corridor by foot, horseback or boat as the Verde River is not a good recreational river. Under present management all forms of traffic in the river corridor and on the road are minimal.

The Blue Book places a definite emphasis on increasing recreational use of the Verde River under Alternative C (pages 38, 41, 42, 46, 47, 48, 54, 56, 57, 58, 59, 60, 61, 63, 64, 65, 66, 67). Also the advantage of Alternative A is clearly stated on page 72 in this regard. "Alternative A avoids recreation use stimulus due to classification."

Therefore, we believe one of the most serious errors of the Blue Book is that Alternative C is the best way to protect the wildlife and their habitat. There is no question that under present management impact on wildlife is minimal and we believe Alternative A is preferable unless further clarification to support the selection of Alternative C is forthcoming in the final statement.

- ② **Recommend:** Correction or deletion of statements:

"During the study process, the primary issue emerging from the public involvement was 'should the study segment of the Verde River . . . be designated as a component of the National Wild and Scenic Rivers System?' This issue was raised by local governments, Salt River Project, Local Cattlemen, mining interests, private landowners, and individual citizens as well as by the Wild and Scenic Rivers Act itself. It is the primary issue addressed in this study". (page 11)

**Discussion:** The Verde River is being considered for inclusion in the system at the request of Congressman Morris Udall. That is common knowledge. We object to the attempt of the Blue Book to justify this study by implying it is at the public's request. We believe it would be difficult for you to document significant statewide interest in this proposal being brought up for study by those you list above. An exception would be the Audubon Society which you have not included in your above list. The Salt River Project refuses to make a statement but from a telephone conversation with a high-ranking official we were informed that they are not in favor of this proposal. Therefore, we feel your above statement is inaccurate and misleading. It should be corrected.

- ③ **Recommend:** (1) A change manner of reporting under "Summary of Comments Received". (page 71)

- ④ (2) A correction in the statement that all private landowners were contacted in person or by letter. We were not contacted as has been pointed out.

**Discussion:** In studying the Blue Book we have found it to contain many gross exaggerations, half truths, and poorly substantiated guesses. All of which tend to support the bias of the Forest Service that adoption of the Verde into the system is desirable. It is now apparent to us that the implementation technique of the Forest Service is to take their predetermined goals; hold public meetings to obtain proof they solicited popular opinion on the project (there will always be a Sierra Club member in attendance to support the Forest Service' position); and, thus justified by such public "input", they can proceed towards their goal protected by this facade of democratic process demanded by the law.

To support our contention we reviewed the roster of those in attendance at the public meetings on the Blue Book. The number in attendance was small and many of those were representatives of other state and federal agencies. Also during our interview with Mr. Morgan, Planner, he stated that the Forest Service tends to disregard written input, i.e. letters, regarding the Blue Book if they simply state preference for Alternative A, or "no action". Such expressions are considered nonconstructive. It appears that no matter how many letters you receive expressing a preference for Alternative A, the Forest Service has already predetermined that Alternative C is what will be submitted to Congress. The procedure appears to mock the democratic process that the Forest Service so diligently appears to encourage. It is a matter of the Planners to know what is best for us.

Therefore, we request that a meaningful tabulation of all written comments be included in the final statement. Express the tallies, not in percentages, but in actual numbers in favor of each of the Alternatives. The responses should be further tabulated as (1) local - or Verde Valley (2) from within Arizona (3) from without Arizona (4) member of Audubon Society (5) member of Sierra Club or (6) state or federal government employee.

**Recommend:** A more detailed report on the impact of the proposal on flood control in the Salt River Valley and on the riparian habitat of the Verde River.

**Discussing Flooding:** The Blue Book Planners state there are certain environmental advantages to the passage of the Proposal. In response to direct question as to why is the Forest Service convinced that Alternative C is preferable over A - Devayne Morgan, Planner, replied that it would eliminate any future dams on the Verde River. However, as the BB points out "flooding in the Salt River Valley below the confluence of the Salt and Verde Rivers is a serious problem - a problem highlighted by the floods of the past three years... page 44 .. The Verde River is a major contributor to the flooding problem and it is likely that additional flood control facilities on the river will be recommended in the CAWCS study". This draft does not include any input from the governments of the cities so drastically affected by those floods. There is no statement from the CAWCS since December, 1979, and there has been much in the local news to indicate there is considerable interest in flood control on the Verde. For example: The Cliff Dam site has been mentioned as a viable alternative to the Orme Dam, etc. The question of whether or not this proposal if adopted will hamper necessary flood control for the Salt River Valley should have greater discussion and clarification.

The recent floods have not only caused problems for populated communities, they have devastated much of the riparian habitat on the Verde River. The destruction of old and young trees, the scouring away of alluvial shelves and all vegetation, the total altering of the river bottom from a green belt to a boulder-strewn wasteland has to be seen to be believed. This topic is not discussed in the Blue Book. The impact of the floods, past and future, on the riparian habitat is of importance in planning.

**Request:** More accurate data be included in the final statement to support the estimated cost of \$1,693,700 to implement Alternative C.

**Discussion:** "The estimated cost of implementing the preferred Alternative, excluding annual maintenance is \$1,693,700." (page 67) This figure is misleading. Of that total, over \$1 million is allocated for scenic easement acquisition. However, no appraisal data is included and evidently has not been done. When we inquired of one of the top planners as to how the allocation was made for scenic easements, he admitted it was a guess and stated that "it's unrealistic but we had to put something down".

Therefore, we recommend that more accurate cost data be included in the final statement on the cost of Alternative C. Let us suggest that, since the maximum cost for scenic easements will be in Segment A, we recommend an MAI appraisal of representative river frontage private land which would be included in scenic easement negotiations. A spot check type of approach could be extrapolated to a meaningful cost estimate of this major expense item. It will give credibility to the report which is now lacking. The political reality of today emphasizes the need for accuracy in cost estimates as well as frugality.

**Request:** Correction of reference to Brown Springs as a ranch headquarters. Also a correction of the statement regards the improvements. (Page 36)

**Discussion:** Brown Springs Ranch is a 50-acre parcel of deeded property which lies on the west side of and adjacent to the Verde River about 17 miles downstream from Camp Verde. We have improved this property for over 20 years. We have built a modern home and guest quarters, a large steel barn, a work and storage shed, a hydroelectric system, and have installed an extensive underground domestic and irrigation water system. A few head of stock are raised on the property. We have no grazing permit on the National Forest although the surrounding area is known as the Brown Springs Allotment. Small grain crops, pasture, wood lot, orchard, and truck garden crops are raised, mainly for home use. Another family lives in their own quarters on the place and work with us. The property does not extend to the river's edge as noted on page 56. Our only access is a graded FS Road #574 also known as Brown Springs Road.

**Recommend:** That the final report include a statement specifically assuring us of unrestricted access to Brown Springs Ranch via FS #574 or Brown Springs Road.

Discussion: Under each Alternative A, C and D (pages 41, 42, 43) the Blue Book states "Roads and trails will be impounded or closed as necessary". And, page 48, "For example, it may be necessary to impose a closure order restricting public use on segments of the river, during the nesting period of the bald eagle . . . .". Again on page 56, "Existing roads and trails will be evaluated and upgraded or closed as needed to provide reasonable public access or protect the values which cause the river to be added to the National Wild and Scenic Rivers System".

On page 4 under question 4 "If private landownership is retained, will road access through the classified area be allowed?"

The answer: "Rights of reasonable access will not be denied. Road access through a designated area to private land would be allowed to the extent it does not significantly impair the natural character of the area."

Since FS #574, Brown Springs Road is the only road to Brown Springs Ranch, and since Brown Springs Ranch is the only private property affected in Segment B by the proposal, a direct statement assuring the owners of the property of unrestricted access should be included in the final statement.

*John W. Moon*  
11/14/86

Forest Service Response to Dr. & Mrs. John W. Moon's comments.

1. See Forest Service response to the position statement submitted by Jekel & Howard on behalf of Dr. and Mrs. John W. Moon.
2. The primary issue statement in Subsection D, Issues and Concerns on page 3 has been revised to reflect your concern. The intent of the statement was not to imply that the study was being done based on public demand. See page 1 for explanation as to why the study is being conducted.
3. As recommended, a tabulation of respondents by residence is included in Section VIII of this report. We did not attempt to tabulate State and Federal government employees or Sierra Club and Audubon Society members because most of the respondents did not provide this information. See Summary of Public Comments, Appendix F.

4. The statement on page 71 that "All private landowners were contacted" was revised to reflect that a reasonable attempt was made to contact all private landowners. It was unfortunate that we sent preliminary information concerning the study to the wrong Dr. Moon (your father) and that you did not receive the message we left with your private land caretaker in Camp Verde.
5. Your statement concerning a discussion with Mr. Morgan is somewhat misleading. Mr. Morgan is a member of the interdisciplinary team preparing this report, and he indicated that his response to you regarding how public comments were to be used was "written input that states why a specific alternative was preferred over another alternative would be more helpful in making the final decision than a simple, I prefer alternative..." All written comments received on the Draft Environmental Statement were considered in preparing the Final Environmental Impact Statement.
6. See summary report of Flood Control activities along the Verde River in Appendix C.
7. We admit that the costs included in the report are our best estimates based on current land values and a cursory review of scenic easement impacts on private lands. However, the study team decided that an in-depth MIA appraisal would add little to the report considering the actual impacts of scenic easements will not be known until the management plan for the river has been completed. The management plan will not be done unless the river is designated. Also, the exact cost of scenic easements will not be known until each proposal has been negotiated with individual landowners.
8. The reference on page 36 to Brown Springs as a ranch headquarters has been corrected. Also, the listing of improvements has been updated.
9. To assure you of unrestricted access to Brown Springs private property via FS #574 would be outside the scope of this study. Therefore, we have elected to provide you an answer to this question through normal Forest Service procedures. I trust the response you have received to date has been satisfactory.



# ATTENTION!

## FROM THE SILENT MAJORITY OF THE VERDE VALLEY

With regards to the Wild and Scenic River Study for the Verde River, November 24, 1980 is the deadline to inform the Prescott National Forest Supervisor of our choice of either Alternative A\*B\*C\*D.

We of the Silent Majority have reviewed the Wild and Scenic River Study and recommend that out of the four alternatives given, Alternative A is our recommendation. Alternative A states that we do not want to change the status of the Verde River.

By remaining silent you're voting for Alternative C which the government favors and it will mean:

1. More government control over private lands.
2. Increase of people along the river.
3. No new or reconstruction of fences, buildings, or irrigation ditches.
4. Livestock grazing will be limited.
5. No flood control dams could be built on the Verde River.
6. No hunting would be permitted.

### **-STOP THIS ACT BEFORE CONGRESS VOTES IT INTO LAW-**

Write to the Forest Supervisor today, stating that you are in favor of Alternative A

### **DO NOT WAIT-WRITE NOW**

Please write: Prescott National Forest, P.O. Box 2549, Prescott, Arizona 86302  
Attention: Mr. Bolander

\*Also send a copy to your Congressman.

#### Forest Service Response to Silent Majority's newspaper article:

This news article was published on November 20, 1980 in the Verde View, a weekly newspaper which is circulated throughout the Verde Valley. We are not sure what influence it had on written comments received following publication, but statements 3, 4, and 6 were in error or misleading.

3. The statement "no new or reconstruction of fences, buildings or irrigation ditches" is misleading. The third paragraph on page 57 of the document states that "unobtrusive fences and other range improvements will be permitted if they do not produce a significant adverse impact on the natural character of the river." The report further states on page 56 that "present uses would not be affected" by designation "without the consent of the landowner." The Scenic Easement which will be negotiated with each private landowner will be the document that places restrictions on private lands. Note that affected landowners will be fully compensated for any loss of development rights.
4. The statement "livestock grazing will be limited" is also misleading. The third paragraph on page 57 states that "livestock grazing will continue to the extent it does not detract from the values for which the river was selected and designated under the provisions of the National Wild & Scenic Rivers Act." It is expected that livestock grazing would continue within a balance of range capacity as defined and directed by the current management trend. This includes consideration for the bald eagle, watershed, vegetation, water quality and other land management elements.
6. The statement that "no hunting would be permitted" is completely in error. The Arizona Game and Fish Department manages wildlife populations and controls hunting of individual species. Designation does not relieve the State of this responsibility. To our knowledge, there are no plans to close the river to hunting. Perhaps the "area closure" actions recently employed by the Forest Service and agreed to by the Arizona Game and Fish Department were interpreted as a trend toward a no-hunting policy. This is not true. The closures are necessary to protect the active nesting sites of the bald eagle and will probably continue with or without designation.

11-22-80

Mr. Morgan,

I recommend that Alternative A be selected for the final draft to be prepared for submission to Congress in April of 1981.

The recommended proposal will hinder if not stop the much needed flood control for the Salt River Valley. Also there is no way that the eagles will remain hidden from public attention if roads are made more passable, parking lots established and sanitation facilities are provided.

I feel the study is extremely inaccurate in many statements made -

Example: Estimated cost of implementing the preferred Alternative, excluding annual maintenance is \$1,693,700." (pg 67)

I am sick of seeing Federal control being placed on everything. The Federal Gov't has enough Arizona Land! What's even worse is when a group such as the Sierra Club can place such an overwhelming effect over a private land holder such as the Brown Spring Ranch!  
Elizabeth B. Force  
11-22-80

Forest Service Response to Elizabeth A. Force's comments.

The cost of implementing Alternative C referred to on page 67 was derived from Table 5 on page 51. The following costs were included:

Transportation System Development.....	\$ 370,000
Recreation Facilities Development.....	225,000
Scenic Easement Acquisition.....	1,075,700
Management Plan Prescription.....	23,000
TOTAL	\$1,693,700

Considering the time available for the study, the best available information was used to make the cost estimates.

Clatsop, Oregon

12 Nov. 1980

President National Forest  
Prescott's Office  
Dear Sir,

We want to express a few of our comments  
on the <sup>new</sup> proposed government statement on the  
lands and stream near farm for the  
Forest Service.

We are many other homeowners in the  
area, we strongly opposed to the plan  
We are free that it would, if passed into law,  
be detrimental in many ways to all property  
owners living on the river and especially  
those living within 1/4 mile of it.

We live on a small parcel of land at  
approximately 150 yards from the river.  
This land has been in the family since  
the 1800s, and we feel that the Government  
certainly should recognize homeholder rights  
of the people in the stream and that we  
should be free to build a farm, house,  
chicken house or anything else that is  
necessary in making a living on your  
own private property.

We, as many homeowners in the

area, are retired and with a very limited  
income. We feel that if passed into  
law, the plan would seriously jeopardize  
the water rights which some depend  
on in order to have a garden, fruit trees  
or feed for their livestock, all of which  
are necessary in making a living.

Many of us feel, and we are sure that  
you will agree, that there is little or  
no question when the Government can  
take your land you own or cannot do with  
your own private property, for that they  
can buy your property at the lowest minimum  
price or if you refuse to sell they  
will condemn it and leave you with  
nothing.

We certainly hope that the plan is not  
passed into law and that you will do  
everything possible to prevent it.

Sincerely,  
Mr. & Mrs. George A. Tissan

Forest Service Response to Mr. & Mrs. George A. Tissan's comments:

The Wild and Scenic Rivers Act does not give the Forest Service the right to buy private property at the "lowest minimum price" or to "condemn and leave the land owner with nothing".

If the river is designated, the Forest Service will not have the authority to condemn for fee title. It can condemn for scenic easements. The scenic easement cannot prohibit, without the landowner's permission, any current regular use exercised prior to the acquisition of the easement. Scenic easements are purchased at the fair market value.

David R. Gipe

1150 Avenue C  
Yuma, Arizona 85364  
(602) 783-8638

November 19, 1980

Forest Supervisor  
Prescott National Forest  
P. O. Box 2549  
Prescott, Arizona 86302

Dear Sir:

The following are my official comments in regard to the "Verde River Draft Environmental Statement and Wild And Scenic River Study."

In general, I have a number of questions as to the accuracy and credibility of the entire report. In Table 4 the report says that in 1978 the Verde had 28,800 recreational visitor days. Having property on the Verde and having spent a lot of time on the river over the past 8 years, I believe this figure to be grossly exaggerated. The same table indicates that Alternative C (the report's preferred alternative) will increase the use of river by 17,923 recreational visitor days by 1990. Of this increase, 4,716 recreational visitor days (or 26% of the total) are projected to be in the area of water-based recreation. This seems highly improbable when the report itself states that the river does not meet the criteria for "outstandingly remarkable" recreational value. The only recreational value that the river has in Segment A is swimming. The river is too shallow for tubing, canoeing, or boating. I make this statement without fear of contradiction because I have raised four children who have on numerous occasions tried the above without success.

Looking further at Table 4, the increase in recreational visitor days from 1978 to 1990 (under Alternative C for picnicking, camping, and water-based recreation) amounts to 11,559 recreation visitor days...an increase of 64% of the total projected increase. For a river that does not have "outstandingly remarkable recreational value," this increase (even if the incoming base for 1978 was absolutely correct) will not happen.

The report projects a cost for Alternative C to be \$1,693,000. If the report is accurate as to construction costs and also in projecting 17,923 increased recreational visitor days, then this amounts to a cost of \$94.46 per recreational

Forest Supervisor  
Prescott National Forest  
November 19, 1980

-2-

visitor day for initial construction in the implementation of Alternative C. Using the same scenario, Alternative B would cost \$233,500 and would result in an increase of 17,198 recreational visitor days, for a "per RVD" implementation cost of \$13.58. I doubt that Alternative C meets any reasonable benefit-cost test. If any designation on the river has to be, then Alternative B certainly comes much closer to a favorable benefit-cost relationship. This is particularly important to consider in light of the fact that the river does not possess "outstandingly remarkable" recreational value. The Verde should therefore NOT be designated for recreation as is defined under the Act.

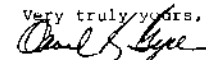
In this period of high inflation the voice of the American people seems to be saying to the government that it should cut out costly ineffective programs. I cannot believe that any individual using the river for recreational purposes between now and 1990 would be willing to pay \$94.46 per day of use. If the people would recognize that this is not a good deal and is not worth what it costs, why should the government even consider going forward?

The above costs are based upon the report's own figures as to use and construction cost. If both are exaggerated favorably by 50%, then the cost per day of use would increase fourfold to around \$400 per day of use.

I believe it goes without saying that in all probability the use of the river will increase over the next ten years without the government spending any money.

Alternative C adversely impacts 737 acres of private land. Alternative D adversely impacts 1500 acres of private land. Both are totally unacceptable when weighed against the benefit-cost relationship for the entire project.

On July 7, 1979 I addressed a letter to the Forest Supervisor on this same subject, but more from the vantage point of a permittee operating a cattle business on the forest. These comments are still appropriate and are attached hereto as a part of my official response.

Very truly yours,  
  
David R. Gipe  
1150 Avenue C  
Yuma, AZ 85364

att.

David R. Gipe

1150 Avenue C  
Yuma, Arizona 85364  
(602) 783-8638

July 7, 1979

Mr. Donald H. Bolander  
Forest Supervisor  
Prescott National Forest  
P.O. Box 2549  
Prescott, Arizona 86302

Dear Mr. Bolander:

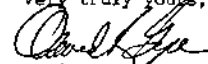
Thanks for your letter of May 24 in regard to the Wild and Scenic River Study involving the Verde River. In keeping with your suggestion I have visited with Dewayne Morgan.

After giving the matter considerable thought I have serious reservations about any of the designations. I think that any official designation would have an adverse effect on ownership of deeded land on the river. There would be increased traffic flow, increased pressure to grant rights of ingress and egress, and impairment of ownership by limiting right to develop - a right that is paramount.

As a Permittee using the Forest Service lands I think that any designation would cause greater difficulty in the ranching operation and in the proper management of the resource. My experience is that increased use brings about greater pollution - much of it in the form of outright filth. Many of the people that use the river are totally irresponsible when it comes to the basic rules of health and hygiene. Until I witnessed it I would not have believed what I have seen after heavy use periods on holiday weekends.

In addition I have great concern about loss of cattle through theft. Many people think that it is alright to kill a calf and help themselves to the meat - as long as they don't get caught. It is obvious that the country is so vast that proper surveillance and law enforcement cannot be adequately maintained. The greater the traffic the greater this problem will be.

When the study is completed could you please send me a resume of the findings. I would like to reserve the right to comment further after the studies are completed and I have had opportunity to review the findings.

Very truly yours,  
  
David R. Gipe

Forest Service Response to David R. Gipe's comments:

1. Based on your concern that the recreation use figures in TABLE 4 were too high, we reviewed the methodology used to make the estimates. We found that the procedures used were adequate. However, an error was found in the 1978 base data for fishing use which reduced the total estimated recreation use to 25,200 RVD's. The necessary corrections have been made in both TABLES 4 and 5. We agree that recreation use is light in the general vicinity of the Verde Ranch and other private lands located at the north end of river segment A. However, the relatively high use near Clarkdale, Beasley Flats and Verde Hot Springs must also be considered when computing total use of the river.
2. A river does not have to possess "Outstanding Remarkable" recreation values to experience an increase in visitor use days. The increases in this report are based on past use records, general population increases and a slight increase due to designation.
3. Your cost analysis of the alternatives is interesting. It assumes that the development costs will be amortized in one year and only the increased recreation visitors in 1980 will benefit from designation. We agree that Alternative B is perhaps more cost effective than Alternative C. However, it should be noted that the cost of acquiring scenic easements on private lands is the major cost element. Recreation classification is not dependent on the amount of recreation use being received by a river. The classification is based on degree of development along the shoreline, access, dams and diversions. See section B, Classification Criteria and Determination on page 3b.

Leonard Staff, Jr., D.O.  
OSTEOPATHIC PHYSICIAN  
2400 MOUNTAIN AVENUE, STE. 200  
TAMPA, FLORIDA 33606  
(813) 977-6200

November 22, 1980

De Wayne Morgan  
Forest Planners  
Prescott National Forest  
P.O. Box 2549  
Prescott, Az. 86302

Dear Sir:

It has been brought to my attention some of the actions pending in the Prescott Forest area.

Therefore, please register my protest against the proposed designation of the Verde River for one quarter mile on each side from Beasley Flats to Table Mountain into the Wild and Scenic River status.

This would be an infringement on people's rights of reasonable access to the area.

I would like to suggest that "Alternative A" be strongly considered and accepted.

Sincerely yours,

*Leonard Staff Jr.*  
Leonard Staff Jr., D.O.

Forest Service Response to Leonard Staff, Jr.'s comments:

The Verde River Draft Study identified sub-standard roads and lack of legal access through private property as the two major problems restricting public access. The management plan described on pages 69 and 70 would analyze the access needs and prescribe road standards. Legal access to and along the river would also be determined.

ORV access would be curtailed, however, the study team has concluded that any access lost to ORV's would be offset by improving the sub-standard roads and providing legal access to and along the river.

BOB STUMP  
30 CONGRESS, ARIZONA  
811 CONGRESS MALL OFFICE BUILDING  
WASHINGTON, D.C. 20515  
(202) 328-4376  
DISTRICT OFFICE:  
3001 FEDERAL BUILDING  
PHOENIX, ARIZONA 85022  
(602) 351-4222

Congress of the United States  
House of Representatives  
Washington, D.C. 20515

ARMED SERVICES COMMITTEE  
SUBCOMMITTEE  
PROCUREMENT AND NUCLEAR  
SYSTEMS  
HATO

October 20, 1980

The Honorable Bob Bergland  
Secretary  
Department of Agriculture  
14th Street & Independence Avenue, SW  
Washington, D.C. 20250

Dear Mr. Secretary:

I am opposed to the designation of the three river segments, comprising 109 miles of Arizona rivers, as part of the Federal Wild and Scenic Rivers System.

Some of the reasons for not including these segments of the Verde, Salt, and San Francisco Rivers are:

- 1) Current efforts toward vital flood control measures could be hindered.
- 2) Designation of approximately 33,210 acres of land on the river banks as "wilderness."
- 3) Lost economic value to private ownership, mining, timber and railroad interests.
- 4) Lost development potential.
- 5) Historical use of rivers by residents.
- 6) Continued withdrawal of public lands from multiple use.

Though I would prefer to have Arizona lands removed from federal control and placed back into local control, the only acceptable alternative proposed in the Draft Environmental Statement and Wild and Scenic River Studies is that which leaves the rivers and their immediate environs and current land uses essentially unchanged. Even this alternative allows for continued federal control of too much Arizona land.

Sincerely,

BOB STUMP  
Member of Congress

BS:cd



**Coconino  
Natural Resource Conservation District**

P.O. Box 2778 Flagstaff, Arizona 86001

November 23, 1980

H. Dewayne Morgan, Forest Planner  
Prescott National Forest  
P.O. Box 2549  
Prescott, AZ 86302

Dear Mr. Morgan:

The Coconino Natural Resource Conservation District Board met on November 16, 1980 and discussed the outcome of the Verde River Wild and Scenic River Study. The following was agreed upon and passed by the Board.

The existing river should be maintained in a "Multiple Use" concept. In future planning of such a concept we recommend:

1. Grazing be an important factor in planning use.
2. Stream bank vegetation should be managed for nesting and cavity dwelling species of wildlife and only those trees removed that are absolutely necessary.
3. With the drastic increase in rafting and boating use, aquisition of scenic easements be undertaken where long stretches of private exist and present Forest Service managed lands be used as scenic access.
4. That the management concept be kept up to date and that prime riparian vegetation protection be a major priority in that management concept.
5. That an exerted effort be made to follow the Clean Water Act and that the river remain free flowing through the designated study area.

Sincerely,

*James R. David*  
James R. David  
Chairman of the Board



Verde Natural Resource Conservation District  
2717 North Fourth St., Suite 130  
Flagstaff, Az. 86001

November 7, 1980

Prescott National Forest  
P.O. Box 2549  
Prescott, Az. 86302

Dear Sirs:

We have reviewed the Draft Environmental Impact Statement, Verde River Wild and Scenic River Study Report.

We feel the only alternative that should be considered is Alternative A, (no designation - No action).

With this alternative the following can be obtained:

1. retention of multiple-use management options
2. more opportunity for maximum economic development flexibility
3. more options kept open for energy development
4. no interference with private landowner rights.

Sincerely,

*John Edge*  
John Edge  
Chairman

*Henry Simonsgaard*  
Henry Simonsgaard  
Secretary- Treasurer

*Werner Meyer*  
Werner Meyer

*Charles Van Gorder*  
Charles Van Gorder

Merlynn Talbot

*Merlynn Talbot*

63-24-3-A



November 10, 1980

Mr. Donald H. Bolander  
Forest Supervisor  
Prescott National Forest  
P. O. Box 2549  
Prescott, Arizona 86302

Dear Mr. Bolander:

The following comments on the Verde River Draft Environmental Statement and Wild and Scenic River Study are provided for your consideration. The Forest Service has prepared a detailed and well organized report considering the time constraints involved.

Phelps Dodge Corporation recommends Alternative A (Continuation of Present Management), as the preferred alternative rather than Alternative C which is preferred by the Forest Service and designates 72.5 miles for inclusion in the National Wild and Scenic Rivers System.

Alternative A retains multiple use management options, but still generally provides the amenities available through the other alternatives. There is no reason to conclude that past Forest Service multiple use management has been wanting. The case for the burgeoning management requirements, that accompany Wild, Scenic or Recreation River Designation, is weak at best.

The Forest Service report did not find outstandingly remarkable recreation opportunities on the Verde River Study Area, and yet, a Recreation Designation is preferred for the upstream 33 mile segment. Although minor recreational improvements (mainly access) would be planned under this Designation, they would be little more than those available under present management. There are 711 acres of private land, including a ranch headquarters, in this upstream segment alone. In addition, a railroad that usually receives daily commercial use traverses the area for about 20 miles upstream from Clarkdale.

The Forest Service has recognized the value of riparian tree regeneration and bald eagle habitat. Thus, appropriate cattle exclosures in sensitive areas are already included under present management plans and these exclosures would be constructed "without constraints that may be imposed by designation," as stated in the report.

The report also states that "existing water quality would be maintained or improved in all alternatives" to meet the standards of the State of Arizona. In addition, there are built-in safeguards that preclude large upstream uses of water. This preserves essentially natural free-flowing river conditions without Wild and Scenic River Designation. Most river water is used downstream and, according to the report, "existing water rights should prevent excessive diversion and loss of flow in the study segments."

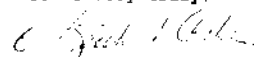
The report concludes that a projected recreation use increase in the study segments could have an adverse impact on archeological sites or wildlife populations, including nesting bald eagles. Although recreation use is expected to increase, regardless of the alternative chosen, it is interesting to note that, with current trends, the increase would be nearly twice as great with Wild and Scenic River Designations than under continuation of present management. Thus, adverse impacts on wildlife and damage or vandalism to archeological sites would apparently be least likely to occur with a continuation of present management options.

Present management serves the dual objectives of proper economic development and environmental quality. Both have been served effectively in the past. Any Wild and Scenic River Designation would foreclose future development opportunities as well as the multiple use management concept that provides a mix of goods and services welcomed by residents in the area. The positive aspects of designation are outweighed by the negative aspects and by lost opportunities. In addition, the anticipated amenities are already largely available without designation and will be preserved under a continuation of present management as noted above.

We recommend that Alternative A, the "no action" alternative, be selected. Of course "no action" does not mean that management is absent. On the contrary, continuation of present management will provide the Forest Service the necessary flexibility to maintain an attractive free-flowing river environment as it has in the past without an additional layer of bureaucratic restrictions that appear to represent regulatory overkill.

I appreciate the opportunity to provide this response on the Verde River Wild and Scenic River Study.

Yours very truly,

  
Keith J. Coke  
Chief Geologist &  
Resident Agent

KJC/I

77-2-5-3-A



Alternative B (Prefer Designation of River Segment B)

Arizona Wildlife Federation

Arizona Resource Council

Arthur Geldon, Flagstaff 86001

Marie Wheat, Camp Verde 86322



**ARIZONA WILDLIFE FEDERATION**  
 P.O. Box 27573 • Phoenix, Arizona 85061 • Phone (602) 264-3884



November 11, 1980

Forest Supervisor  
 Prescott National Forest  
 P.O. Box 2549  
 Prescott AZ 86302

Regards to comments on the draft notice of the Draft Environmental  
 Impact Statement of Verde Valley, Arizona.

After due consideration, The Arizona Wildlife Federation executive  
 board supports the premise that the area on the Verde River from Beasley  
 Flats to Table Mtn. should be conserved in the principal of multiple use.

The major use of this area should be managed for the benefit of the  
 public in that it has some natural Wildlife and Scenic benefits. Any  
 private construction or home building that would take place on the land  
 could be detrimental, thus depriving the general public of an area that  
 has natural beauty to be used for their enjoyment and appreciation of  
 their heritage.

Alternative "B" and "C" are the most highly considered alternatives  
 of the four being offered. If left with no other choice than to choose  
 one of the alternatives it would be "B". However, those areas to be  
 considered for alternative "C" we would make the recommendation that the  
 private developer leave a park area on the river front for the publics  
 access and enjoyment.

Because of the possibility of a dam being build just south of the  
 Table Mtn. area on the Verde River we would suggest that the Wild design-  
 nation area at the confluence of the Fossil Creek and Verde River point  
 to the Table Mtn. be considered to have some other designation that  
 would not prohibit the controls of water through the Verde River area.

The main reason for this is in time of drought the wildlife suffer  
 because of lack of water. The bald eagle which resides in this area  
 would be limited in its food supply.

Respectfully Submitted,

*Tom Camp*  
 Tom Camp Vice President  
 Arizona Wildlife Federation

TC

nb

Published 1977 by Formerly The Arizona Game Protective Association • State Affiliate of The National Wildlife Federation, Washington, D.C.

76-24-3 B/c

*CR 148*

Arizona Resource Council  
 P.O. Box 790  
 Glendale, AZ 85311

November 12, 1980

Forest Supervisor  
 Prescott National Forest  
 P.O. Box 2549  
 Prescott AZ 86302

In regards to comments on the draft notice of the Draft Environmental  
 Impact Statement of Verde Valley, Arizona.

After due consideration the Arizona Resource Council supports  
 Alternative "B", which encompasses the Verde River from Beasley Flats  
 to Table Mtn. and should be considered in the principal of multiple  
 use.

Areas to be considered for Alternative "C" we would make the recom-  
 mendation that the private developer leave a park area on the river front  
 for the publics access and enjoyment.

Lastly, it is our understanding that the management of the river and  
 surrounding land would remain in the hands of the Forest Service after  
 the inclusion into the Act and that little to no improvements would be  
 done until warranted. We understand the need to keep our wild rivers  
 just that, wild and natural and the inclusion into the Wild and Scenic  
 Rivers Act seems to do just that, protect our lands from industrial  
 and commercial expansion.

However, we do not understand why it took a National Act to get  
 people to look over the situation. Why couldn't the state of Arizona  
 implement this Act without the help of the rest of the nation. Surely  
 Arizona would have a better understanding of the situation than anyone  
 else.

Respectfully,

*Nita S. Heeter*  
 Nita S. Heeter President  
 Arizona Resource Council

nh  
 dw

*Darlene K. Weber*  
 Darlene K. Weber Vice President  
 Arizona Resource Council

93-24-3-B

114

Alternative C (Prefer Designation of River Segments A & B, Excluding  
5 1/2 Mile Private Land Section)

Arizona Game and Fish Department

\*Center for Public Affairs

\*Department of Health Services

\*Arizona Department of Public Safety

\*NACOG, Region III

\*Central Arizona Association of Governments

AORCC, Arizona Outdoor Recreation Coordinating Committee

Prescott City Council

Coconino Sportsmen

National Audubon Society

Prescott Audubon Society

The Wildlife Society

The Prescott Junior Women's Club

Salt River Project

U.S. Department of Agriculture - Soil Conservation Service

\*Submitted State Clearing House Standard Form - "Proposal is Supported  
as Written"

Geoffrey Platts, Carefree 85377  
Mrs. Buster Estes, Sedona 86336  
David Duckett, Prescott  
Peri Harkins, Prescott  
May Overton, Prescott  
Francis Moore, Prescott  
George Pearson, Prescott  
Larry Langstaff, Tempe  
Peter Corbett, Clarkdale  
Marcia Herriott, Prescott  
Bill Fleishmann, Prescott  
Lester Womack, Prescott

A. W. Scott, Prescott 86301  
Bert Leper, Clarkdale 86324  
Bill Brent (no town)  
William Gaud, Flagstaff  
Arthur Frost, Sedona  
Virginia Miller, Prescott  
M.E. Pearson, Prescott  
Eloise Moore, Prescott  
Vera Walters, Prescott  
Phil Herriott, Prescott  
Thomas Fleishmann, Prescott  
Beverly Womack, Prescott

Alternative C

Roy Houser, Prescott  
Berdella Bancroft, Prescott  
Edward Backas, Prescott  
Gertrude Armitage, Prescott  
Carl Tomoff, Prescott  
David Preston, Prescott  
Margaret Laird, Prescott  
Peggy Ford, Prescott  
Charles Spenser, Prescott  
Don Williams, Phoenix  
Mr./Mrs. R.O. Withers, Prescott  
Peg Briney, Prescott  
Alma Greene, Sedona  
William Evans, Prescott  
Thomas Ferrell, Rimrock  
Kenneth Hodges (no town)  
John Heckman, Prescott  
Maria Carccia, Prescott  
Anne Bower, Prescott  
Susan Kiesel, Prescott  
Wayne Watson, Phoenix  
Rick Alexander, Prescott  
Sam Vaughns, Camp Verde  
Grace Palmer, Prescott  
Gary Vesperman, San Mateo, CA  
Lynn Jacobs, Cottonwood

David Wolf, Flagstaff  
Ruth Backas, Prescott  
Charles Armitage, Prescott  
Peg Boyce, Prescott  
Douglas Hulmes, Prescott  
Sandra Scott, Prescott  
Georgette & Robert Sullivan, Prescott  
James Spenser, Prescott  
Frank Lett, Prescott  
Nolan Hester, Prescott  
Anne Valentine, Prescott Valley  
Alan Loeake, Tucson  
Steve Fletcher, Prescott  
Jo Ellen Bernstein, Prescott  
Jeanne Clarke, Prescott  
Loucile Heckman, Prescott  
Lin Sonnenberg, Juneau, AK  
Sandy Simpson, Prescott  
Jeff Dann, Prescott  
Mr./Mrs. John Crane, Camp Verde  
Peggy Chaikin, Flagstaff  
Robert Rothrock, Cottonwood  
Mrs. Dale Carlsen, Cottonwood  
Jim McCarthy, Phoenix  
James Cowlin, Phoenix

BRUCE BABBITT, Governor

Commissioners:

C. GENE TOLLE, Phoenix, Chairman  
WILLIAM H. BEERS, Prescott  
CHARLES F. ROBERTS, O. D., Globe  
FRANK FERGUSON, JR., Yuma  
FRANCES W. WEBNER, Tucson

Director  
ROBERT A. JANTZEN

Deputy Director  
ROGER J. GROENEWALD



**ARIZONA GAME & FISH DEPARTMENT**

2222 West Greenway Road Phoenix, Arizona 85023 942-3000

November 21, 1980

Mr. Donald H. Bolander  
Forest Supervisor  
Prescott National Forest  
P. O. Box 2549  
Prescott, Arizona 86302

Re: Verde River - Draft  
Environmental Statement  
and Wild & Scenic River  
Study

Dear Mr. Bolander:

The Arizona Game and Fish Department has reviewed the referenced documents, and the following comments are provided:

The Department strongly supports the preferred alternative, Alternative C. This alternative will provide much needed riparian habitat protection, zoning restrictions, and enhance the Department's efforts to reestablish the River Otter.

For the most part, we believe the Service did an excellent job in the wildlife portions of the draft document, however, we do have several specific suggestions that would more accurately depict species occurrence and resource values.

① Page A-2, Gray Hawk

There is only one record of Gray Hawk north of the Gila River and no breeding records. Listing this species here is probably not warranted.

② Page A-2, Tiger Salamander

Ambystoma tigrinum stebbinsi does not occur in this part of Arizona, though other more common subspecies do.

Page A-4

③ The Buff-breasted flycatcher may possibly occur in this part of Arizona, although there are no recent records. Even when formerly

Mr. Donald H. Bolander - 2 -

November 21, 1980

Page A-4 (Cont'd)

more common in the State, the area in question was at the extreme northern limits of its range.

④ Gila robusta seminuda is restricted to the Virgin River and does not occur in the Verde River. Minckley (1973) lists G. r. robusta in the Verde, not G. r. grahami.

Pages 25-27

⑤ The Department supports the proposed program of excluding livestock grazing in areas of vital riparian habitat along the Verde River. This habitat is essential to maintaining those qualities that have made wild and recreational designations possible. Removal of livestock will effectively enhance and protect the long-term value of the river.

Pages 32-34

⑥ The report states that the river did not meet the criteria for "recreation value" because it didn't have one or more of the elements of that criteria. With all the hunters, fishermen, backpackers, birdwatchers, picnickers, and others that are attracted to the Verde on weekends, it is hard to believe that the river didn't meet a criteria based on variety of users.

Page 68

⑦ In several areas of the report, the need for increased accessibility and facilities is stressed as necessary, due to a protective designation. This would certainly seem to contradict and defeat the objectives of the proposed management plan. Certainly there is a need for sanitation facilities at some points along the river, even now, but there is no apparent need to increase access. The wildlife and the primitive nature of the river will be jeopardized if roads are built and increased use is encouraged. The main directive of the Forest Service should be to maintain and improve, where possible, the natural qualities of the area.

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**Salt River Project**  
WATER POWER

Mr. Donald H. Bolander

- 3 -

November 21, 1980

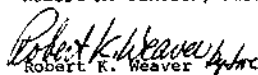
BOX 1980 PHOENIX, ARIZONA 85001

TELEPHONE 273-5900

The Department appreciates the opportunity to review the subject documents and to offer comments.

Sincerely,

Robert A. Jantzen, Director

  
Robert K. Weaver

Habitat Evaluation Coordinator  
Planning and Evaluation Branch

RKW:dd

cc: Levi Packard, Supervisor, Flagstaff Regional Office

Forest Service Response to Arizona Game & Fish Department's comments:

1. The Gray Hawk was removed from the Threatened and Endangered Species List as suggested.
2. The Tiger Salamander was removed from the Threatened and Endangered Species List.
3. Considering there are no recent records of the Buff-breasted Flycatcher in the Verde River area and the river being at the extreme northern limits of its range, the bird was removed from the Threatened and Endangered Species List.
4. Gila Robusta Seminuda was removed from the Threatened and Endangered Species List as suggested.
5. Please note that the current policy of excluding livestock grazing in areas of vital riparian habitat along the Verde River is not the result of this study. See statement on page 26.
6. The study team did agree that the recreation opportunities were many along the Verde River. However, considering the current use is comparatively low and access is limited it was decided that the river did not have "outstanding remarkable" recreation value. The situation could change if legal access is obtained and the need for stream-side recreation increases in the future. See Recreation Value section on page 34.
7. There are no current plans to construct new access roads to the river. All references in the report to construction and/or reconstruction apply to existing roads. Some new construction would be necessary in the vicinity of the river to avoid private lands or to provide a satisfactory river crossing. The proposed improvements consist of sanitation facilities and parking areas which are needed for obvious reasons.

November 21, 1980

Mr. Donald H. Bolander, Supervisor  
Prescott National Forest  
P. O. Box 2549  
Prescott, Arizona 86302

Dear Mr. Bolander:

RE: Verde River Wild and Scenic River Study -  
Draft Environmental Statement

The above report has been reviewed by several departments within the Salt River Project and we have the following comments:

SPECIFIC COMMENTS

Page 3, Second Paragraph: The Draft EIS states that:

① "The primary issue emerging from public involvement is, "Should the Verde River and its immediate environment (study corridor), or portions thereof, be designated as a component of the National Wild and Scenic Rivers System?" This question was raised by local governments, Salt River Project, ..."

No such question was included in previous SRP comments.

Page 4, Fourth Paragraph: This reads:

② "Unobtrusive gauging stations and their continued maintenance are allowed under a wild and scenic river designation if there is no significant adverse effect on the natural character of the area."

Definitions should be provided for the terms "unobtrusive" and "significant adverse effect."

Page 35, Eighth Paragraph (1. Segment A):

③ This should mention that there are two stream gaging stations located on this segment: Verde River Near Paulden and Verde River Near Clarkdale. Access to both gages is by road.

Page 37, Second Paragraph (Reference to Segment B, South Section):

④ It should be mentioned here that an existing SRP stream gaging Station (Verde River Below East Verde River) is located on this stream segment. Helicopters are the only operational means of access.

257-2-4-3-c

Mr. Donald H. Bolander  
Page 2  
November 21, 1980

Page 37, Section C, Criteria for Evaluating Alternatives:

- ⑤ These criteria should include consideration of potential need for future stream flow monitoring facilities and water resource developments as may be needed to meet local and downstream power, water and flood control requirements.

- ⑥ Page 41, Footnote: The change from the original "study segment B" to a new "study segment B'" that is about 11 miles shorter is confusing. The modified study segment should have been called something else.

GENERAL COMMENTS

This draft report appears to be well written, comprehensive and readable. We would like to complement the authors on an unusually clean and complete report.

Should Alternative C be adopted as recommended, the lower portion of Segment A (proposed for Recreation designation) and the upper portion of Segment B (proposed for Scenic designation) could be made unusable as potential sites for coal-fired power plants and water exchanges by Verde Valley residents for CAP water could become impossible. It is our understanding that Recreation designation would have no effect on the operation and maintenance of either the Verde River Near Paulden or the Verde River Near Clarkdale stream gaging stations.

While we have concerns about the need for future water development and flood control facilities and so have some reservations about placing any restrictions on such actions within the SRP watershed, SRP will not object to the recommended Recreation and Scenic designations.

- ⑦ Under Alternative C the lower portion of Segment B would be assigned a Wild River designation. The Draft EIS does not specifically discuss the SRP Verde River Below East Verde River stream gaging station that is located within this area. This gage is maintained by helicopter as no road access exists. We doubt that this gage would be considered to be "unobtrusive" and doubt that it can be made less conspicuous. As you are aware, stream flow monitoring is a major concern of SRP, state and federal agencies and the residents of the Phoenix area. Any actions that could impact the operation, maintenance, and even the replacement of any gaging station would be met by strong opposition. While SRP is not opposed to wild and scenic rivers designations per se, we are, as mentioned above, concerned about limiting opportunities for future water supply and flood control actions, and, especially, about adverse impacts on existing and future stream gaging stations.

If the Wild River designation can be written in such a manner that this gaging station and all future reconstruction or replacement, operation and

maintenance actions, including helicopter access, will not be effected by such designations, the Salt River Project will not oppose it.

⑧ It appears that designation of an area as wilderness or wild and scenic river tends to attract user attention to the designated area. The resulting increased use often is accompanied by severe impacts on the very values that were to be protected by the designation. We suspect that this effect may occur on the Verde River, should it be designated, with resultant water quality problems and other environmental impacts. This Draft E.I.S. does not address this possibility, and we believe that it should.

In summary, the Salt River Project can support the recommended Alternative C, provided that the proposed designations will not adversely effect the existing stream gaging stations or the operation and maintenance actions that will be associated with them.

Sincerely,

*Glenn D. Harris*

Glenn D. Harris  
Environmental Services Department

GDH:rsq

Forest Service Response to Salt River Project's comments:

1. The primary issue statement in sub-section D on page 3 has been revised to reflect your concern.
2. The Wild and Scenic Rivers Act requires a Management Plan to be developed for each river included into the National System. This document will be based on more indepth studies and will address the terms and definition you want clarified. SRP will be contacted for their input during the development of the plan.
3. The two stream gauging stations have been added on page 35.
4. The stream gauging station has been added on page 37.
5. The evaluation criteria were developed early in the study process from existing legislation, regulations and public input. They were written broad enough to cover the issues and concerns voiced during our early scoping meetings. The study team has considered your request and have concluded--even though not specifically mentioned in the evaluation criteria, stream flow monitoring facilities and water resource developments are involved in one or more of the criteria.
6. The study segments were not modified. The study of the additional 10.5 miles was considered as a separate Alternative E. See page 44, Alternative Eliminated From Further Consideration.
7. The fifth paragraph on page 57 has been rewritten to reflect your concerns.
8. See the last paragraph on page 47.



THE WILDLIFE SOCIETY

ARIZONA CHAPTER

P. O. BOX 35414 PHOENIX, ARIZONA 85069

November 20, 1980

Mr. Donald H. Bolander, Forest Supervisor  
Prescott National Forest  
P. O. Box 2549  
Prescott, Arizona 86302

Dear Mr. Bolander:

Thank you for sending a copy of the Verde River Draft EIS and Wild and Scenic River Study. The following are suggestions you might find useful in preparing the final EIS.

We concur with the U.S. Forest Service's recommendation that Alternative C, the preferred alternative, should be implemented on the Verde River. We support adequate protection for the wetland and aquatic habitats of the river, thereby helping to ensure the continued survival of numerous wildlife species which are dependent on these habitats for their survival.

Several localities mentioned in the text of the report do not appear to be listed on any map. Locating these names on a map in the final EIS would be helpful:

- 1) Page 13 - Bear Siding Road (FS #182), Packard private lands access road (FS #131), and Forest Trails 41, 66 and 67.
- 2) Page 19 - Brown Springs, Cold Water Creek, Sycamore Creek, Oak Creek, Beaver Creek, West Clear Creek, and East Verde River.

We also urge a reevaluation of the section "Alternatives Eliminated From Further Consideration" beginning on page 44, before the writing of the final EIS. By January 1981, the Central Arizona Water Control Study (CAWCS) should have eliminated several structural and nonstructural elements and formulated five or six systems (combinations of elements) for flood control and regulatory storage. If a modified Horseshoe Dam, New Horseshoe Dam and the two larger size Cliff Dams are not part of the formulated systems, then the section of the Verde River between Tangle Creek and Table Mountain should be included in

Mr. Donald H. Bolander - 2 -

November 20, 1980

the final EIS as proposed for wild river designation. If any of the aforementioned elements are included in the proposed systems, then the consideration and evaluation process for this section of the Verde River should be delayed until completion of Stage II of the CAWCS. If the selected system for flood control and regulatory storage will not impact this section of the Verde River, then the evaluation process for wild river designation should be resumed.

③ If possible, in Table 4 on page 46, the future with and future without date of 1990 should be extended farther into the future.

② Finally, a Literature Cited section or Bibliography should be included in the final EIS and would be most helpful.

We thank you again for considering our suggestions. We look forward to reviewing the final EIS.

Sincerely,

*Bob Barsch*  
Bob Barsch  
President

BB:dd

Forest Service Response to the Wildlife Society's comments:

1. We have added the localities to the river segment maps on pages 14 and 15. Thank you for bringing this oversight to our attention.
2. The section on Alternatives Eliminated From Further Evaluation, page 44, has been revised. See section in Appendix C on Flood Control Activities (CAWCS) and Section VII, Identification of the Preferred Alternative, page 67.
3. In making the recreation use projections to year 1990, we have assumed that the past use trend will continue in the future. To project the expected recreation use for a period of more than 10 to 12 years would involve many more variables such as energy shortage, employment, inflation, and etc. For the purpose of this report, it was decided the information in Table 4 was adequate.
4. Considering the limited amount of published literature cited in the document, it was decided a bibliography section would not be required.

156-2-4-3-C





Subject INTERA - Wild and Scenic Rivers -  
Verde River, Arizona

Date SEP 23 1980

To: Charles R. Hartgraves, Director, Land Management Planning  
Forest Service

We have reviewed the Verde River Draft Environmental Statement and Wild and Scenic River study as requested in your August 22, 1980, memorandum. The report clearly lays out four alternatives. It is our considered opinion that Alternatives B or C offer the most compatible configuration given all involved factors. Alternative C appears to be a wise selection as the preferred alternative. It presents a mix of outputs expected by both local and broader interest groups.

The Principles and Standards require formulation of plans serving coequal national objectives of National Economic Development (NED) and Environmental Quality (from page 39). Alternative A is considered the NED alternative, as it does not foreclose future development. There are no firm proposals for development. Conjecture of future development was not used to establish possible value of future development. Consequently, no monetary value was determined for the option of future development. This distorts the effects shown in tables 5 & 7. According to these tables, Alternative D is the best NED plan.

Regeneration of hardwood concerns wildlife managers according to the second paragraph on page 25. The statement implies cattle grazing is the cause of the problem. Will regeneration occur with implementation of management plans prepared under the alternatives?

The Cultural and Historic Background on page 10 is interesting. We suggest reversing the first two phases of the Archaic Period to read, "As the climate changed, the game herds died out...."

EDGAR H. NELSON SEP 23 1980  
Director  
Basin and Area Planning

Forest Service Response to Soil Conservation Service's comments:

1. Due to the number of comments received regarding the NED alternative, the study team reanalyzed the NED account and concluded no true NED alternative exists. See statements on pages 34, 40 and 49.
2. As stated on page 25, the Forest Service has completed an action program for resolution of the apparent livestock - riparian conflicts. It has been determined that the program, with minor constraints on fence construction, is compatible with designation. Livestock will be excluded from key riparian areas that need cottonwood regeneration regardless of designation action taken.
3. We have made the change on page 10 as suggested. Thank you for your comment.

Don Williams  
4025 W. Camelback, Apt N-10  
Phoenix, AZ 85019

Forest Supervisor  
Prescott National Forest  
P.O. Box 2509  
Prescott, AZ 86301

Verde River Draft Environmental Statement of  
Wild & Scenic River Study

In general, I strongly agree with most of the findings in this document and with the preferred alternative. I do not feel qualified to make any comment about Study Segment A as I have spent little time in that area. I have, however, spent a good deal of time in Study Segment B, from Cottonwood Basin to the junction of the Verde and East Verde Rivers.

First, I did catch one error of fact. The Verde Hot Springs resort building did not burn in 1958 as is stated on page 17 but on January 14, 1962. In 1958 it underwent the last change of ownership. The deck area around the bathing pools, the steps down to the bathing pools, and the suspension bridge that used to span the river at the bathing pools were all constructed by the new owners after 1958.

I do disagree strongly with the statement, on page 34 under "Recreational Value", that the Verde provides no "outstandingly remarkable" recreational opportunities.

My current "hot button", the Verde Hot Springs do provide a recreational opportunity that is both outstanding and unique within the state! These are the last of the hot mineral springs in Arizona that are open to the public. They are also the only ones in Arizona on a perennial stream with cool

water swimming areas near the springs. As is mentioned on page 17, Verde Hot Springs still draw large crowds. The majority of the people seem to be from the Phoenix-Mesa-Tempe and Flagstaff areas with a significant number from Tucson and occasional out-of-state visitors from as far away as Minnesota and Washington. I believe that the numbers of people willing to drive a fairly long distance (in excess of 100 miles) with a significant distance of dirt road indicates that the area does provide "outstanding" if not "remarkable" recreational opportunity.

Over a fairly long period of observation and increasing interest in the area (approximately 10 years), I have concluded that a very large part of the Verde Hot Springs' attraction and the "outstandingly remarkable" recreational opportunities that they provide lie in their use as a "clothing optional" area despite an explicit Forest Service regulation to the contrary. This regulation, which was put into effect in 1977, has been enforced rarely; I know of only a single instance of its enforcement. Based on observation of the people who use Verde Hot Springs, I strongly believe that the "public nudity" portion of this regulation should be rescinded and the area, at least in the vicinity of the bathing pools, be officially designated and posted as a "clothing optional" area. <sup>2</sup> Spence Hot Springs in the Santa Fe National Forest in New Mexico provide at least one precedent for such official designation. The "clothing optional" people are the ones who do most of the maintenance of the area; picking up trash, carrying out trash, cleaning the bathing pools, etc.


I have mixed feelings about the "improved access" mentioned several times in the document. Currently, there are only two reasonably good roads into the area between Cottonwood Basin and Tangle Creek; the Brown Springs Road (FS 574) and the Childs Road (FS 502). The Penitence Road (FS 16) up from Bloody Basin is a very long, very bad dirt road requiring high clearance, 4-wheel drive, and very careful driving. The Dugas Road (FS 57), which joins FS 502 at the Verde River 3 miles north of Childs, is shorter but no better. FS 16 joins FS 502 just south of Childs. Improving any one of the 3 roads that come in to the Verde near Childs would probably just increase the crowding at Verde Hot Springs. Improving the Dugas Road (FS 57) could provide an element of safety, however. Current access to this area is on the northeast side of the river while the springs are on the southwest side. During spring run-off there is considerable danger to people trying to cross the river to get to the springs. An improved Dugas Road would provide access to the springs without a river crossing.

Sanitation facilities are probably needed at Verde Hot Springs despite the results of this study are any increase in crowding that they might encourage. Too many people are currently using the area and sanitation facilities are needed for reasons of health.

I am also concerned about the effect of designation as a "Sage River" on the archeological sites in the area. The Draft has very little to say on this subject although there are numerous sites in the area. Improved access to the area for recreational use would mean an increase in the number of "pot hunter" in the area also.

I believe that the Environmental Statement should address the matter of protection, investigation, research, and even restoration of these sites. Over the years, the site at Towel Creek has almost been destroyed. I also believe that the matter of historical research should be addressed. I recently went through almost a year of investigation trying to find the history of the Verde Hot Springs resort and know that next to no historical data on the area from Cottonwood Basin to Fossil Creek exists.

I tend to consider the northern part of Study Segment B to be "my" river and strongly favor any measures to protect and preserve it for my enjoyment. I am not sure that "improved access" or camp and recreational area developments are measures that would preserve and protect it.

Sincerely,  


Forest Service Response to Don William's comments:

1. Thank you for bringing to our attention the error on page 17. We have corrected the year the Verde Hot Springs Resort burned to 1962.
2. As stated on page 68 of the report, a management plan would be prepared if the Verde River is designated as a component of the National Wild and Scenic Rivers System. The existing "public nudity" policy would be reviewed at that time.

January 16, 1980

Mr. Dewayne Morgan  
 U. S. Forest Service  
 Prescott National Forest  
 P. O. Box 2549  
 Prescott, Arizona 86302

Dear Mr. Morgan:

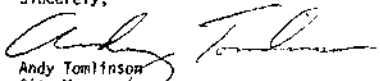
In response to the National Forest Service's request for reactions and comments to the alternatives proposed for management of the Verde River under the Wild and Scenic Rivers Act, the Prescott City Council considered this matter at its January 14, 1980 meeting. However, first, I would like to take this opportunity on behalf of the City of Prescott to express our appreciation for encouraging comments on these river management proposals. Participation and cooperation such as this certainly helps to insure more compatible and acceptable use of our natural resources.

After an explanation and discussion of the proposed alternatives, the Council unanimously passed a motion endorsing Alternative "C" and opposing Alternative "D".

The explanation of each alternative as provided in the December, 1979 issue of "Wild and Scenic Rivers of Arizona", along with consideration by the Council as to which alternatives would completely avoid or, at least, minimize any potential conflict with the future use of Prescott's water needs, led to this particular endorsement.

Again, the opportunity to comment upon this matter is very much appreciated, as is the consideration you will give this endorsement. If any further elaboration on this matter is desired, please contact me at your convenience.

Sincerely,

  
 Andy Tomlinson  
 City Manager

AT:vbs

**CITY OF PRESCOTT**

P.O. BOX 2069, PRESCOTT, ARIZONA 86302



Prescott Audubon Society  
544 Glenwood Avenue  
Prescott, Arizona 86301  
3 November 1980

Donald H. Bolander, Forest Supervisor  
Prescott National Forest  
P.O. Box 2549  
Prescott, Arizona 86302

Dear Mr. Bolander:

Members of the Prescott Audubon Society, comprising over 200 individuals, have reviewed the Verde River Draft Environmental Statement and Wild and Scenic Rivers study and offer the following comments for your consideration.

We feel that Congress was wise in redirecting the water policy of our nation and instructing us to set aside riparian areas in their natural state. There are very few undisturbed riparian habitats left in the arid Southwest and, as the study stated, over 60% of the vertebrates in Forest Service lands near the Verde river use or require this habitat for survival. These include the endangered Southern Bald Eagle and Ferruginous Falcon. Some of the most complex biological communities, not only in the Southwest, but in the entire United States, occur along the Verde.

We firmly believe that the Verde River should be preserved in its free-flowing condition and given as much protection as possible. It is clear from our review of your comprehensive study that large portions of the Verde meet the exacting qualifications for Wild and Scenic status. To ignore this and do nothing, as alternative A suggests or to make only a token effort, as implied by alternative B, would be a betrayal of public trust. Although some members prefer alternative C, which provides maximum protection, others consider it less practical to implement and support alternative D.

Therefore we wish to go on record as supporting the Forest Service in selecting either alternative C or D.

Thank you for the opportunity to participate in this planning process. We offer our name and support in this effort. If we can be of further assistance in this or in other resource matters, please feel free to call on our organization.

Respectfully submitted,

*Carl S. Tomoff*  
Carl S. Tomoff, President

*Ray Hansen*  
Ray Hansen, Conservation Chairman

91-2-4-2-9/0

(16.91)

## NATIONAL AUDUBON SOCIETY

P.O. BOX 3557 • BOULDER, COLORADO 80507 • (303) 449-0210

October 29, 1980

Mr. H.D. Morgan  
Prescott National Forest  
P.O. Box 2549  
Prescott, Arizona 86302

Dear Mr. Morgan,

Our regional office would like to go on record as supporting either alternative C or D for the Verde River Wild & Scenic Rivers Act proposal.

I am quite familiar with several stretches of this very important river as my family lived in the immediate area for close to 15 years. Good riparian habitat is an endangered commodity in the Southwest and as experts have pointed out, provides extremely important habitat to most species of wildlife.

Sincerely,

*Robert K. Turner*  
Robert K. Turner  
Regional Representative

AMERICANS COMMITTED TO CONSERVATION

## Coconino Sportsmen

P.O. BOX 1301  
FLAGSTAFF, ARIZONA 86002

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### VERDE RIVER

### DRAFT ENVIRONMENTAL STATEMENT

AND

### WILD AND SCENIC RIVER STUDY

Forest Supervisor  
Prescott National Forest  
P.O. Box 2549  
Prescott, AZ 86302

Dear Sir:

Enclosed are our comments and selection of a desired alternative to the Draft E.I.S. as headlined above. We will comment on several specific items, not necessarily the total Draft.

**SCENIC VALUES**--While in some instances scenic values affected in this study are not of notable interest or are in areas not visited by the majority of travelers or users, this value cannot be totally overlooked. This is especially true if said values are compromised by development, roadways, electrical facilities or water/flood control impoundment devices. Thusly, scenic easements, including corridor air space, should be placed into effect, as listed in Statute 16 U.S.C. 1286. Scenic values such as land formations, riparian vegetation belts, freely flowing waterways and wildlife cannot many times be equated in dollar values comparable to effects of their loss. Once compromised or lost to whatever type of development, these values never again are nor can be enhanced or replaced to their original conditions or values. The Verde River's scenic values are indeed significant enough to be included

### LIFE MEMBERS

PAUL J BARRETT  
GORDON EVANS SR  
MILTON EVANS  
MAX HAMILTON  
ARTHUR HOLMGREN  
WILLIAM MATHIAS  
C B WILSON JR

## Coconino Sportsmen

P.O. BOX 1301  
FLAGSTAFF, ARIZONA 86002

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MILTON EVANS  
MAX HAMILTON  
ARTHUR HOLMGREN  
WILLIAM MATHIAS  
C B WILSON JR

-2-

in the National Wild and Scenic River Inventory.

**FREELY FLOWING RIVER**--Here again, the value of this item cannot be computed in a positive value. Adverse conditions during flooding, revenue from electrical devices or dams, and irra-

gation values can easily be computed. However, as our wild and scenic rivers are subjugated, are economic values a viable measuring stick as to the total value of a project. We believe they are not. Other measures must needs be considered for flood control/losses, hydro-electrical desires, and increased flood-impingment. This last include also heavy demand on the river's waters by irrigation pump systems.

**WATER QUALITY**--The quality standards of the Verde River need to be further defined, tested and controlled. The needs of quality water supplies to fish, wildlife, cattle and human consumption should not be ignored or compromised. High concentrations of silt from farming, chemicals, phosphates would seriously provide adverse impacts to those mentioned in this paragraph.

**FISH AND WILDLIFE**--This item/issue is one of our greatest concerns. Each of the issues concerned in this Draft will either directly or indirectly affect this value. In lieu of general economic/protective views and needs this would only commit increasingly adverse impacts as time goes on. Economic and residential demands and activities would serve to significantly decrease wildlife values, numbers, and quality both of non-endangered and endangered species. High voltage transmission lines, should they be constructed in this area, would serve as an increased hazard to hawks and eagles. As this area

39-2-4-3-C

## Coconino Sportsmen

P.O. BOX 1301  
FLAGSTAFF, ARIZONA 86002

### LIFE MEMBERS

PAUL J. BAGBITT  
LEONOR EVANS SR  
MILTON EVANS  
MAX HAMILTON  
ARTHUR HOUNGREN  
VILLIAM MORRILL  
C. B. WILSON, JR.

-3-

involves a high number of bald eagles, this species would be significantly adversely impacted. Changes in water flow, depth and quality would seriously affect the food chain of waders leading to further decreases in their numbers in

both mature birds and hatching young. As such found placed on wildlife habitat cultivation, inclusion of the Verde River into the Wild and Scenic classification would serve to stabilize or decrease these demands.

WILDSCE--To insure the alternatives included in the Verde River System as Wild and Scenic maintain quality values in all respects to all receptors, we recommend the following needs and criteria.

1. Cattle Grazing--This is a viable product within the Wild and Scenic concept. This activity can be and should be allowed as provided by sound conservation and range management values. Allotments and range improvements or maintenance should be controlled by sound management decisions and practices.
2. Recreational Use--While it is possible that this item may increase, it probably would not be for the Wild and Scenic designation alone. Continued population expansion will place increased demands on the River System regardless. We believe that this should be controlled by limiting camping and access so as to restrict or limit user numbers to a reasonable number, to limit intrusion on wildlife values, yet permit adequate recreational needs.
3. Access--Reasonable access to useable areas within the plan concept is acceptable and necessary. However, access on roads already existing

## Coconino Sportsmen

P.O. BOX 1301  
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### LIFE MEMBERS

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LEONOR EVANS SR  
MILTON EVANS  
MAX HAMILTON  
ARTHUR HOUNGREN  
VILLIAM MORRILL  
C. B. WILSON, JR.

-4-

may prove sufficient for all needs except emergency.

Upgrading of present roadways and trails is also acceptable.

We would however, preclude any new roadways to be built to raise user numbers for "use" alone. Part of the values

included in a Wild and Scenic concept is the desire for space and wilderness type experiences. This would be provided only by as low a density of users as can be adequately maintained and managed. Thus, we alternate the use of existing access.

4. Land Acquisition--We would advocate this item to enhance riparian values and wildlife needs.
5. Water Treatment/Flow Facilities--We find no adverse impact in the present facilities or the addition of limited additions of like equipment. No further water reservoir construction should be considered.
6. Flood Control--While this item does in fact bring adverse impacts to our state population in some areas, to divert, or control by flood control dams, etc. would severely impact the Wild and Scenic values and concepts. We would advocate that other concepts for this purpose be explored in viable areas and designs where the Verde River in it's Wild and Scenic state would not be affected.
7. Other--We therefore advocate that management of the Verde River System within the outline of the Draft E.I.S. be that which would incorporate, enhance, conserve and in some cases protect all the values necessary to qualify and maintain this area as truly Wild and Scenic.

## Coconino Sportsmen

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FLAGSTAFF, ARIZONA 86002

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NORTH STAR AMMO & GUN  
THE CUCI SERVICE  
T. A. PHARMACY  
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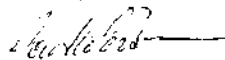
-5-

Also that wildlife and wildlife habitat of all species be given priority status within any and all management plans.

We realize that some economic and social potential will be adversely impacted within the designated corridor planned. We do not necessarily condemn economic growth of any fashion where viable, without compromising wildlife values or concepts as in this study. While some constraints, restrictions and compensations will affect landowners within the plan concept, the values preserved and enhanced in the long term will become more significant in value for both ours and future generations.

We therefore concur and select alternative "C" as our proposed alternative, and management of this alternative to be as described within the E.I.S., or as may be necessary to implement the concepts and design of the Verde River as a Wild and Scenic Waterway.

Sincerely,

  
Ace H. Peterson, Pres.  
Coconino Sportsmen

cc:  
E. Max Peterson  
Coconino Nat. Forest Supervisor  
Tonto Nat. Forest Supervisor  
Arizona Wildlife Federation

815 N. 4th St.  
Cottonwood, AZ  
86326  
11/24/80

Forest Service Supervisor  
P. O. Box 2549  
Prescott, Az. 86302

Dear Sir:

I am writing to comment on the Verde River Wild & Scenic Program. Having read the majority of the Environmental Impact Statement, I feel in favor of retaining the river's free flowing condition. I feel these habitats are desirable and warrant protection. However, I question the need for obtaining property easements in order to meet these objectives. Can you clarify this policy?

Yours truly,  
Robert Rothrock

Alternative D (Prefer Designation of River Segments A & B, Including  
5 1/2 Mile Private Land Section)

Arizona Outdoor Recreation Coordinating Commission

Laura Corbin, Tucson  
C.O. Minckley, Flagstaff  
Edward Zuk, Prescott  
Daniel Fischer, Tucson  
David Palmer, Prescott  
Grace Palmer, Prescott  
Martha Fabian, Prescott  
Charles Aid, Prescott  
Cari Bloor, Prescott  
Renee Mason, Prescott  
Madeline Alston, Prescott  
Letitia Morris, Prescott  
Kim Reynolds, Prescott  
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Michael Berry, Tucson  
W. Gary Lockrow, Flagstaff  
Douglas Hulmes, Prescott  
C.J. de Ward, Tucson  
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Philip Latham, Prescott  
Kathaleen Fletcher, Prescott  
Joanne Mecs, Prescott  
Marianne Locke, Prescott  
Joel Barnes, Prescott  
Kate Udall, Prescott  
Maria Patterson, Prescott



11-10-80

19 September 1980  
2820 N 1st Street  
Flagstaff, Arizona 86001

Forest Supervisor  
Prescott National Forest  
P. O. Box 2549  
Prescott, Arizona 86302

Dear Sir,

I have just reviewed the Verde River Draft Environmental Statement and Wild and Scenic River Study, and have comments on the status of the spikedace and aquatic snails occurring in the Verde River and along the proposed corridor.

The spikedace, *Meda fulgida*, although once widespread in the Gila River system, now exhibits a very reduced distribution, with populations occurring in southeastern Arizona and in the Verde River. Within the Verde River, this fish has been found to occur only in a 1/2 mile reach near the river bridge on FS #354, in River Section A. Why this fish only occurs in this section is unknown, but makes it imperative that this area be preserved, if this species is to survive in the Verde River. This fact was not apparent in your report, and I feel it should have been brought out.

Also, in relation to the aquatic snail fauna, several endemic, undescribed species, exist in the proposed area, and should have also been addressed, in my opinion. Such species are present in the Verde Hot Springs and Browns Spring, and I am sure several other species are present in the proposed corridor. I would suggest you contact Mr. Jerry Landye, 3465 N. Jamison, Flagstaff, an expert on southwestern snails, for additional information on these interesting invertebrates.

Additionally, in response to the overall plan, I would prefer to see Alternative D implemented, followed by C and B. I find Alternative A unacceptable.

Sincerely,

*C. O. Minkley*  
C. O. Minkley

Forest Service Response to C.O. Minkley's comment:

Thank you for bringing the spikedace to our attention. We have included the additional information on page 83 in the Appendix.

Forest Supervisor  
Prescott National Forest  
P.O. Box 2549  
Prescott, Arizona 86302

*These are comments on the Draft Environmental Statement regarding Wild and Scenic River Designation for segments of the Verde River.*

*The Forest Service's preferred alternative, C, is not the optimum choice for the Verde. Alternative D which designates all eligible segments of the Verde is the best alternative for River.*

8/7-2-2-3/10 (UR-87)

protection.

The reasons given for selecting Alternative Cover D are sparse; it is apparent that political considerations weighed more heavily than the actual characteristics of the river corridor.

The report, though generally well written, was not clear on several points. For example, page 52 tabularizes environmental effects of the different alternatives. The table leads one to believe that no vandalism of historic sites occurs now, but will increase if the river is designated. This may be true, but those sites will be protected just as they are now by current laws.

①

The table on page 53 shows that alternative D would clearly generate the most economic benefits, yet the table on page 63 shows D exerting a negative influence on local area economic growth (points). This inconsistency should be clarified.

Point three on that table is somewhat confusing. It appears that the assessment of impact is not based on kind of impact, but the raw amount of land affected. I must argue that the minimal constraints inherent in designation should not be assumed compounded if the number of private inholdings affected is nine instead of seven.

The computations used to project

① user days (page 46) should be shown so the reader can see what the numbers are based on.

I'd like to encourage the Forest Service to manage all lands adjacent to the study areas in a manner that will enhance and protect the river corridors. This would be especially important for the proposed 'wild' section of study area "B".

The report gave welcome recognition to the protection of wild life habitat. Perhaps the final report could explain the grazing regulations and their operation, which is independent of river designation.

I'll be looking forward to the final report.

- Joni Raul

Forest Service Response to Joni Bosh's comments:

1. Table 6 has been revised.
2. The table on page 53 evaluates economic affects of designation based solely on the flow of recreational expenditures. For analysis of the alternatives, this was the only factor that could be quantified. Criterion 6 on page 65 evaluates both the short and long-term ability to provide a mix of all goods and services. The study team felt that the future options of development eliminated by Alternative D more than offsets the increased revenue brought into the area by the recreationist.
3. The study team decided that for comparative purposes, the number of private land acres were important. The individual affect of scenic easements cannot be determined until the Management Plan is written.
4. One of the requirements of the "Regulations for Implementing the National Environmental Policy Act" is to keep the document short and analytical. For this reason, we did not include much of the support material. This data is on file at the Forest Supervisor's Office, Prescott National Forest, Prescott, Arizona.



DAB

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Public Affairs Director: Mary Alice Blyden

1333 West Camelback Road • Suite 206 • Phoenix, Arizona 85013 • (602) 256-6113

December 13, 1979

Mr. Phil Gilman  
Wild and Scenic Rivers  
Tonto National Forest  
P.O. Box 29070  
Prescott, AZ 86301

Dear Phil:

In response to the proposed alternatives for Wild, Scenic or Recreation designations of portions of the Salt, Verde and San Francisco Rivers, the Arizona Outdoor Recreation Coordinating Commission (AZORCC) would like to convey the following general comments for your consideration in selecting the Forest Service's preferred alternatives.

As you are well aware, opportunities to recreate on or near free-flowing rivers and streams are extremely limited in Arizona. As continued economic and population growth exert increasing pressure on the state's limited resources, these opportunities may continue to diminish, especially near urbanized areas.

The Forest Service, however, will play a pivotal role in securing recreational use for many of the remaining unaltered river resources of the State. Incorporation of the study segments of the Salt, Verde, and San Francisco Rivers into the National Wild and Scenic Rivers System will provide legislative, hence perpetual, protection for these critical streams while insuring recreational use by the general public.

Therefore, in recognition of the tremendous demand for river-related recreation and the shrinking supply of free-flowing rivers, AZORCC supports the following alternatives:

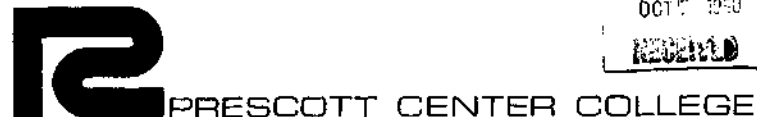
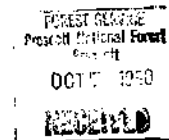
San Francisco River - Alternative B  
Verde River - Alternative D  
Salt River - Alternative B

I urge you to give the fullest consideration to recommending for designation under Wild, Scenic, and Recreation River classifications all study rivers and segments that qualify and meet the criteria for inclusion in the System.

Thank you for providing us the opportunity to review and comment on this extremely important proposal. We look forward to receiving the draft environmental impact statements for these rivers.

Sincerely,

*Mary Alice Blyden*  
Mary Alice Blyden  
Director/State Liaison Officer



October 3, 1980

Prescott National Forest  
P.O. Box 29070  
Prescott, AZ 86301

To Whom It May Concern:

I am writing in regards to the recommended designation of Wild and Scenic River Status for the Verde. I would like to commend your office for producing the well written management plan. I personally would like to offer my support for Alternative D giving the maximum amount of protection for the Verde River. I do feel that Alternative C is also acceptable, and being unfamiliar with the characteristic of private ownership on the 5.5 miles near Pauldon, I will trust your judgement in making the wisest choice.

I have spent a considerable amount of time on the lower section of the Verde in numerous capacities. In 1971-72 I participated in an extensive bird study of Riparian Communities along the Verde under the supervision of Dr. Roy Johnson and Dr. Steve Curuchers of the Museum of Northern Arizona. I have participated in YCC conservation projects at the sheep bridge near Table Mtn. and I have rafted and hiked most of the area being considered.

I have noted bald eagle, golden eagle, black hawk, and the highest species diversity of birds in AZ along the Verde. The recreational potential for whitewater rafting and kayaking is excellent. The Wilderness quality and opportunity for solitude is also high.

I feel it is vitally important that these sections of the Verde River be given Wild & Scenic Status in order to maintain and protect the Wilderness, recreational, and ecological values of this river.

Sincerely,

*Douglas Hulmes*

Douglas Hulmes  
Professor of Environmental Studies

16-2-2-2 *DE* VE-16

220 GROVE AVENUE / PRESCOTT, ARIZONA 86301 / (602) 778-2090

Alternative C or D Plus 10.5 Mile Tangle Creek Section

Earth First (A National wilderness preservation organization)

KOKOPELI (Adventures in learning)

Four Corners Wilderness Workshop

Arizonans for Wild & Scenic Rivers

The IZAAK Walton League of America

Tucson Audubon Society

AWWW (Arizonans for Quality Environment)

Northern Audubon Society

Southern Environmental Council

Steven Rouzek, Karpenta  
Steven Thompson, Tuba City  
Mike Schultz, Phoenix  
Michael Hilty, Phoenix  
Sylvia Forbes, Tempe  
Alan Seegert, Bisbee  
Joan Field, Phoenix  
Rudi Lambrechtse, Bellemont  
Bill Williams, Flagstaff  
Daniel Kaplan, Prescott  
Kelene Kaplan, Prescott  
Jim Rooney, Chino Valley  
James Foster, Chino Valley  
Kate Allison, Chino Valley  
Fred Snyder, Sedona  
Rob Little, Prescott  
Heather McKay, Flagstaff  
Carrie Nevill, Chino Valley  
Michael Boswell, Tucson  
Dan Daggert, Flagstaff  
James R. David, Flagstaff  
Rita Wuehrmann, Chino Valley  
William Hence, Chino Valley  
Wayne & Sharon Haughton, Chino V.  
Sheila Thompson, Chino Valley  
Wm. & Evelyn Helmeke, Sedona  
Deborah Camly, Flagstaff  
Trish Jahnke, Flagstaff

Rebecca Peck, Douglas  
Marie Burling, McNeal  
W. G. Walker, Phoenix  
Carolyn Downey, Tempe  
Bruce Berger, Paradise Valley  
James Posedly, Tucson  
John Guild, Scottsdale  
Julianne Weigel, Tucson  
Gary Lewallen, Chino Valley  
Deede Lewallen, Chino Valley  
Dave Healey, Flagstaff  
Linda Wilson, Prescott  
Nigel Dickens, Chino Valley  
Pat Dickens, Chino Valley  
Gregory Vanuk, Prescott  
Douglas Koppinger, Tucson  
Gref Green, Flagstaff  
Betsy McKellan, Flagstaff  
Patty McDaniel, Flagstaff  
Hank Chaikin, Flagstaff  
C.R. Wueben, Chino Valley  
Gary Beverly, Chino Valley  
Molly Beverly, Chino Valley  
Warren Wasser, Mesa  
Eugene Thornesberry, Chino Valley  
Anita MacFarlane, Sedona  
R. J. Longtin, Sedona  
Will Osborn, Sedona

Alternative C or D Plus 10.5 Mile Tangle Creek Section

Sidney Hyde, Rimrock

Jane Welton, Sedona

Wayne Van hoorhis, San Francisco

Jim Vaaler, Phoenix

Donna Baken, Sedona

Maleese Black, Sedona

Sandra Lopez, Paulden

## Arizonans for Wild and Scenic Rivers

Box 87  
Cortaro, AZ 85230  
November 18, 1980

Mr. Donald Bolander, Supervisor  
Prescott National Forest  
P.O. Box 2549  
Prescott, AZ 86302

Dear Mr. Bolander:

Please enter these remarks as part of your public review period for the draft environmental statement and wild and scenic river study for the Verde River.

Our organization has carefully examined your alternatives and do not support any of your alternatives. We support the following:

1. Recreation designation for river from Forest boundary near Paulden to Beasley Flats (38.5 miles) including the five and a half miles of private land.
2. Scenic designation for the 22 mile section from Beasley Flats to the junction of Fossil Creek.
3. Wild designation for 27.5 miles from Fossil Creek to Sheep Bridge, a short distance below Tangle Creek.

The Central Arizona Water Control Study August, 1980 newsletter states that the enlargement of Horseshoe Dam has been eliminated from consideration on the basis of having the greatest environmental impact. Earlier, the Tangle Creek/Verde River confluence dam was dropped from consideration due to unsuitable geology. There are no dam sites being actively sought now in the 27.5 mile segment. With this in mind and the fact that our rivers diminish daily, we can only urge that this lower segment achieve full protection.

We disagree with your analysis of the recreational value of the Verde River including your statements on page 34. We feel that any river that affords the desert dweller a white water experience of the quality that the Verde affords is providing an outstandingly remarkable recreation experience. Length of river use season is of no bearing when discussing a desert river's white water quality.

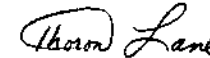
2

How many places in the world can one drive a few hours from a large metropolitan center, toss a raft, tube, canoe, or kayak in the water and flow through a Saguaro landscape on a river that still flows free?

Realizing that over 10,000 dams constrict streams or rivers in this country and that .003% of vegetation in Arizona is considered riparian, it is essential that we place major portions of Arizona's rivers in the National Wild and Scenic River System.

We are pleased to have the opportunity to comment on the draft and look forward to hearing from you in the future.

Sincerely



Thoron Lane  
Chairman

### Forest Service Response to Thoron Lane's comment:

1. As stated in the report, the evaluation criteria were reviewed and modified at a public workshop. Pages 31-34 of the document explain how the determination was made. While there has been some question as to whether or not the river has "Outstanding Remarkable" recreation value, the study team decided to accept the workshop's recommendations.

Wayne Van Voorhies  
USARP-McMurdo  
Antarctica  
FPO San Fran., Calif.  
96692

11/13/80

Dear Forest Service,

It was with considerable interest that I read the Draft Environmental Statement for the Verde River. I have had extensive experience with the Verde River both in rafting and kayaking the stretch between Beasley Flats and Horseshoe Dam as well as a kayak trip from the base of Sullivan Lake to the dam. From my experience the Verde certainly classifies as a wild and scenic river and one which deserves to stay in that state. It is important to appreciate and protect our unique natural resources of which the Verde River is one.

I support you in wanting to designate all eligible river segments except for a 5.5 mile section of the River (Alternative C). Personally I would like to see the lower section between Table Mountain and Tangle Creek also designated as "wild" as this is a fine stretch of river with high aesthetic value. However I realize that this would be difficult to do in view of flood control plans for the Verde River.

One question I have concerns fences across the River. Barbed wire fences are the rafters nemesis to be avoided at all costs. Fences are not usually a great problem on the Verde as when the river is high enough to raft it is usually also high enough to wash out the fences. However during the spring of 1978 we encountered one fence around 12 miles below Beasley Flats which was much more substantial than your usual "water gap" type fence. This one was made of a one inch plowshare

steel cable hung across the river with barbed wire suspended underneath. This fence was located just below a major rapid and was a definite hazard to navigation not to mention life and limb. Is there any way to control the placing of such fences? I realize the need to control cattle movement but it seems that this can be adequately done with a small fence which washes out in high water. I have not had problems with fences since that incident in 1978 and that fence was removed several weeks later when the big spring floods came through. However consideration should be given to the river runner before permission is granted to place fences across the river.

I wish you the best of luck in implementing the designation as stated in Alternative "C". I would appreciate receiving any additional reports you come up with on the Verde River. I will be in Antarctica till January and will then return to Prescott where my address will be 561 Lincoln Ave.

Sincerely  
Wayne Van Voorhies

Forest Service Response to Wayne VanVoorhies' comment.

The placement, construction and maintenance of water gaps would be considered in the Management Plan for the river. See Item 8 under C., Management Plan, page 70. The responsible National Forest was notified of the existing hazard upon receipt of your letter.





Standing Committee:  
AIR POLLUTION  
CONSERVATION EDUCATION  
GRAND CANYON  
POPULATION  
WATER  
WILDERNESS  
WILDLIFE

November 24, 1980

Mr. Donald Bolander, Supervisor  
Prescott National Forest  
P. O. Box 2549  
Prescott, AZ 86302

Dear Mr. Bolander:

We would like these comments to be entered as a part of the record of your public review for the draft EIS and Wild and Scenic River Study.

We feel that your recommendations do not give adequate recognition of a valuable, vanishing resource. There are very few stretches of whitewater left in Arizona. Even though the season is short - or intermittent - it does provide unique recreation for a large number of enthusiasts. Protection of the riparian vegetation is essential to the wildlife which occupies that environmental niche.

Since the enlargement of Horseshoe Dam from study by the Central Arizona Water Control Study (Newsletter, August 1980), there are no dam sites under consideration in the Fossil Creek to Sheep Bridgestretch.

We therefore urge the following designations.

1. Recreation designation from Forest Boundary near Paulden to Beasley Flats.
2. Scenic designation for section from Beasley Flats to Junction with Fossil Creek.
3. Wild designation from Fossil Creek to Sheep Bridge.

Sincerely yours,

Roy M. Enrick  
Co-chairman

RME:eac

Southern Arizona Environmental Council  
P.O. Box 40966  
Tucson, Arizona 85717

Phil Gilman, River Study Coordinator  
Tonto National Forest  
P.O. Box 13706  
Phoenix, Arizona 85002

Dear Mr. Gilman,

The Southern Arizona Environmental Council (SAEC) has reviewed initial studies of the Salt, Verde, and San Francisco rivers for wild river status and would like to make the following comments.

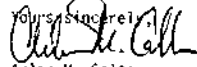
In reference to the portions of the Verde River under study, SAEC believes that a combination of alternatives "D" and "E" would provide maximum protection, both wild and scenic, for the 88 miles of river.

SAEC also strongly supports classifying the 22 mile study area of the Salt River to wild river status. We therefore urge alternative "B" for the Salt.

The San Francisco River initial studies present a greater dilemma for the SAEC to comment on. SAEC cannot support any of the three proposed alternatives because the Forest Service has unfortunately failed to study the full length of the river that was congressionally required for study. Once this is accomplished, we feel that the Forest Service will be able to propose amongst logical alternative: (a) wild river status for the lower San Francisco and the segment of the upper reach between Harden Cienega and the New Mexico border, and (b) recreational status for the stretch between the Forest Service boundary and the cienega.

Overall, we wish to reiterate that the Southern Arizona Environmental Council strongly encourages protection of this scarce resource, Arizona's rivers, wherever possible. Please make sure that we receive any pertinent information in the future.

Thank you for the opportunity to comment.

Yours sincerely,  
  
Arlan M. Colton  
President-elect, SAEC  
January 9, 1980

327-2-4-3-F  
110 207

Mr. Don Bolander  
 Forest Supervisor  
 Prescott National Forest  
 P.O. Box 2549  
 Prescott, Ariz. 86302



17 NOV 80

Dear Mr. Bolander:

Thank you for sending me a copy of the Draft Environmental Statement and Wild and Scenic River Study for the Verde River. Please accept our congratulations for a well done and well balanced study. One notes quickly the usual groups opposing any designation of a Wild and Scenic River alternative for the Verde River. This is unfortunate because so little remains of untouched riparian habitat and relatively free flowing streams in Arizona. We believe it is important to bring note & portion of the Verde River now, under the promotion and support Alternative C - the preferred alternative in the study. This appears to be a good compromise based on the careful review presented.

It is absurd to state that the principal reason for the study and for selecting Alternative C is to save a few nesting pairs of Bald Eagles. This is only

Approved Persons  
 BOY D. CROCKETT  
 DONALD W. GIBSON  
 C. D. BULL-ROSE  
 Administrative President  
 DOB CONDO  
 A. THOMAS SKERRY  
 JAMES H. GLAZIER  
 MURPHY J. CASE

Executive Board  
 HOWARD S. WHITE  
 H. THOMAS SKERRY  
 RAYMOND TAYLOR  
 L. M. JAY LEARNING  
 T. LOVO A. WANDER  
 MRS. DAVID JUDITH SMITH  
 G. R. JONES  
 WILSON'S CONSULTING  
 RICHARD F. DUBIN

Approved Staff  
 GEORGE B. HUBBARD  
 KEE L. VON  
 JAMES H. GLAZIER  
 JOHN F. CLAY  
 GUY CONLEY  
 G. A. JEFFY ELLIS  
 JAMES H. GLAZIER  
 CLAUDE R. HARRIS  
 CLIFF WALKER  
 DR. ALFONSO J. ARETI



a minor side benefit. The interests of flood control in the Verde Valley would be far better served by not building on the flood plain rather than by building another dam on an already overly managed river. On this regard we are aware that the proposed flood control project - enlargement of the Horvath Dam - has been dropped from consideration by the Central Oregon Water Control Study. This action should lead to a will designation for the Verde River from Fossil Creek to Sheep Bridge - a full 27.5 miles, instead of the original 17.5 miles. This action, therefore, should lead to a new alternative - the original "C" plus the lower 10 miles mentioned above. This new alternative would be the choice of our group.

Thank you for the opportunity to comment on the study and please believe these remarks are the official word of this study.

Sincerely yours,  
 William T. Binney

B3



## TUCSON AUDUBON SOCIETY

30-A N. TUCSON BLVD.

TUCSON, AZ 85716

November 20, 1980

Mr. Donald Bolander, Supervisor  
Prescott National Forest  
P.O. Box 2549  
Prescott, AZ 86312

Please enter these remarks as part of your public review period for the draft environmental statement and wild and scenic river study for the Verde River.

The Tucson Audubon Society has carefully examined your draft including all alternatives and we do not support any of your alternatives. We support the following:

1. Recreation status for river from forest boundary near Paulden to Beasley Flats to total 38.5 miles. Included is the 5.5 miles of private land.
2. Scenic designation for the 22 mile section from Beasley Flats to the junction of Fossil Creek.
3. Wild designation for 27.5 miles from Fossil Creek to Sheep Bridge.

Now that the Central Arizona Water Control Study has eliminated from consideration both the enlargement of Horseshoe Dam and the Tangle Creek/Verde River confluence dam, the entire 27.5 mile section should be designated wild. rated

We are pleased you have fish and wildlife values as outstandingly remarkable but we disagree with your recreational value rating. We feel strongly that a river allowing white water sports in the desert can only be rated as outstandingly remarkable. In addition, watching wildlife on such a river can be rated as outstandingly remarkable due to the wide variety of species as well as the opportunity to observe a threatened or endangered species.

The Wild and Scenic Rivers Act is a unique form of legislation allowing federal protection of rivers that flow both through federal and private land as well as through state land. Your preferred

215-243-F

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conservation      education      recreation

alternative, Alternative C, would prevent this special capability from being utilized. If the private landowners are not informed properly, they can easily misconstrue the Act and the intent of the Act. If most of the private landowners along the river have expressed a desire to keep the river as it is today as you say on page 67, the best way would be to put it in the National River System and maintain the status quo. Perhaps the study team did not do a good job of educating these folks or fell down in their public relations. In any case, we cannot support removal of the 5 miles as you suggest.

We are pleased to have the opportunity to comment on the study draft and look forward to hearing of your progress.

Sincerely,

Linnea Holland  
President

*Please note that  
conservation is the  
we have already made  
thank you*

FOUR CORNERS WILDERNESS WORKSHOP  
715 West Apache  
Farmington, New Mexico  
87401

November 13, 1980

November 7, 1980

Mr. Donald Bolander  
Forest Supervisor  
Prescott National Forest  
PO Box 2549  
Prescott, AZ 86302

Dear Dan

On behalf of EARTE FIRST, a national wilderness preservation organization, I would like to offer support for designation of the Verde River as a unit of the National Wild & Scenic Rivers System.

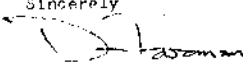
The Verde is truly a remarkable river in the Southwest and richly deserves the maximum protection.

EARTE FIRST supports Alternative B with the addition of the river below Table Mountain to the head of Horseshoe Reservoir as Wild.

We also support wilderness designation for all BARE II areas adjacent to the Verde.

We oppose excessive visitor development or improvement of access to the river.

Sincerely

  
Dave Foreman  
EARTE FIRST  
1802 Sun Ct  
Rio Rancho, NM 87124

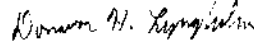
Forest Supervisor  
Prescott National Forest  
P.O. Box 2549  
Prescott, AZ 86302

Dear Sir:

The purpose of our group is to seek measures to preserve examples of many varieties of natural ecosystems in sufficient size to preserve their genetic resources and functional character. Riparian areas in the Southwest are a particularly important habitat type. We strongly support protection of these values along the Verde River.

We join other conservation groups in calling for recreation designation for the Verde River near Paulden to Beasley Flats (58.5 miles). We ask for scenic designation for the 22 mile section from Beasley Flats to the junction of Fossil Creek and Wild designation for the 27.5 miles on to Sheep Bridge below Tangle Creek.

Sincerely yours,

  
Donavan H. Lynchola  
Box 103  
Flagstaff, AZ 86002

92-2-4-5-D

6/24-3-F

# KOKOPELI

Adventures in Learning  
P. O. Box 1557, Flagstaff, Arizona 86002  
602/774-3778

November 19, 1980

Forest Supervisor  
Prescott National Forest  
P.O. Box 2549  
Prescott, Arizona 86302

Please accept these comments regarding the Verde River RIS and Wild and Scenic River Study. Kokopeli Adventures in Learning feels that Alternative D would best serve and protect the Verde River under Wild and Scenic River management, if this alternative were altered to include the section of river from Table Mountain to Sheep Bridge, just below Tangle Creek.

Research study done by the Museum of Northern Arizona on the Verde River (S.W. Carothers, G.R. Johnson, S.W. Aitchison, "Population Structure and Social Organization of Southwestern Riparian Birds," 1974; American Zoologist, #14: 97-108.) shows that riparian habitat is extremely important to birds and other wildlife. With only .003% of all vegetation in Arizona considered riparian and its known importance, this section from Table Mountain to Sheep Bridge should be included in Alternative D for protection.

We appreciate the effort and depth of your study and anxiously await the Final RIS on the Verde River.

Sincerely,

Bill Williams, Director



PO Box 195,  
Rimrock, Az. 86335  
November 24, 1980

Supervisor, Prescott National Forest,  
Prescott, Az. 86302  
PO Box 2549

Dear Sir:

I wish to amend my letter to you of last week concerning classification of the Verde River. I have just received information that plans to enlarge Horseshoe Dam have been dropped.

Therefore, I would like to recommend the following plan for classification:

That the Forest Service Alternative C be used for the classification, plus the section of the river from Table Mountain Sheep Bridge be classified as Wild; in other words, classifying the river from the mouth of Possil Creek to Sheep Bridge as Wild, in addition to the words of Alternative C.

Thank you for including this as my amended recommendation for classification of the Verde River.

Sincerely yours,

*Sidney Hyde*  
Sidney Hyde

(Northern Arizona Audubon Society)

Alternative Preference Unknown

\*Prescott Historical Society

\*Department of Transportation, Socio-Economic Analysis Section

\*State Mine Inspector

\*Agriculture & Horticulture Department

\*OEPAD - Hathaway

\*Office of Arid Land Studies

\*Arizona Natural Heritage Program

Atlantic Richfield Company

Arizona Public Service Co.

U.S. Department of the Interior - Office of the Secretary

U.S. Department of the Interior - Water & Power Resources Service

United States Environmental Protection Agency

Department of the Army - Corps of Engineers

Department of Energy

Federal Energy Regulatory Commission

U.S. Department of Agriculture - Rural Electrification Administration

Department of Housing and Urban Development

The Secretary of Commerce

\*Submitted State Clearing House Standard Form - "No Comments on This Project".

Atlantic Richfield Company 555 Seventeenth Street  
Denver, Colorado 80217  
Telephone 303 576 7577

J. R. Mitchell  
Public Lands Coordinator



November 20, 1980

Forest Supervisor  
Prescott National Forest  
P. O. Box 2549  
Prescott, Arizona 86302

Re: Draft Environmental Impact Statement for Verde River

Dear Sir:

Atlantic Richfield Company appreciates the opportunity to comment on the Forest Service's Draft Environmental Impact Statement (DEIS) regarding the addition of a segment of the Verde River in Arizona into the National Wild and Scenic Rivers System.

Atlantic Richfield Company supports the multiple-use concept for public lands and waterways. Additionally, we support the concept of reasonable environmental protection; and we take the necessary action to assure its protection. We believe that the nation's energy requirements and environmental concerns are not mutually exclusive. The nation can have an improved energy future by using an effective and responsible multiple-use land management plan on public properties under its jurisdiction. Too often, rigidity rather than flexibility has characterized environmental laws and regulations relating to the use of public lands and waterways. This rigidity has resulted in reducing the additions to the nation's domestic energy supply, increasing our dependence on foreign oil imports, reducing the stability of the nation's economy and has endangered our national security. We believe that all efforts should be exerted to find ways in which necessary energy activities may be conducted while providing for reasonable environmental protection and preservation of the scenic values of our rivers.

Industry has shown that petroleum exploration and development activities, environment preservation and other multiple-use needs are a compatible combination. For example, other multiple-use activities have been engaged successfully conducted concurrent with the execution of environmentally sound energy activities on federal and state lands such as the Kenai Moose Range, Prudhoe Bay in Alaska, and wildlife refuges along the Gulf of Mexico.

A small area along the Verde River, within Township 11-J2 South and R6-7 East, has been classified by the Arizona Bureau of Geology and Mineral Technology as being a "region of high chemical geothermometers" and contains the Verde Hot Springs. The Verde location is at the intersection of two major fault systems. This combination suggests that

Forest Supervisor  
November 20, 1980  
Page No. 2

the geothermal potential of this area is promising. The attached maps show the location of these geothermal features. The DEIS should recognize this potential, and an alternative should be developed that would provide access for geothermal exploration along the river system. The outcrop along the river bank frequently affords a unique opportunity to observe the local geology. Therefore, reasonable access to these outcrops would be beneficial to any exploration and development programs related to oil, gas, and geothermal resources which may exist in the area.

Atlantic Richfield Company recommends that the Forest Service provide for reasonable access for energy exploration and appropriate development along the Verde River system in any wild and scenic river alternative that it may select.

Again, we appreciate the opportunity to provide our comments to the Forest Service on this issue. If you need any additional information, please contact us.

Sincerely,

J. R. Mitchell  
Attachments

Forest Service Response to Atlantic Richfield Company's comment:

The study team has analyzed the geothermal and oil and gas data for the area and decided that the area does not contain sufficient potential for development of a special alternative that would allow for exploration and/or development of the resources.



IN REPLY  
REFER TO  
120.0

United States Department of the Interior

WATER AND POWER RESOURCES SERVICE  
ARIZONA PROJECTS OFFICE  
SUITE 2200 VALLEY CENTER  
201 NORTH CENTRAL AVENUE  
PHOENIX, ARIZONA 85073

NOV 18 1980

Mr. Donald H. Bolander  
Forest Supervisor  
Prescott National Forest  
P.O. Box 2549  
Prescott, Arizona 86302

Dear Mr. Bolander:

We have reviewed the Verde River Draft Environmental Statement and Wild and Scenic River Study report. Our review was primarily with respect to any effects that the proposed action would have on Water and Power Resources Service projects. Specific comments as to methodology, content, and conclusions are also provided.

The allocation of Central Arizona Project (CAP) water to municipalities and Indian tribes along the Verde River would likely be effectuated through water exchanges with the Salt River Project. On August 8, 1980, the Secretary of the Interior made proposed allocations of CAP water for Indian use. These proposed allocations included three tribes which could take water from the upper Verde or its tributaries: Yavapai-Prescott - 500 acre-feet per year; Camp Verde - 1,200 acre feet per year; and Tonto-Apache - 110 acre-feet per year. In addition, the Arizona Water Commission (AWC) in 1977 recommended that the Secretary of the Interior allocate CAP water to five municipal entities along the upper Verde River, three of which (Prescott, Cottonwood, and Camp Verde) could divert water directly from the Verde River above or in the study area, and two others (Pine and Payson) which could divert water from the East Verde or its tributary Pine Creek. The AWC recommendations are currently being revised, but the October 1980 Department of Water Resources staff recommendations for these five municipalities increase from an aggregate of 4,533 acre-feet per year in 1985 to 18,396 acre-feet per year in 2034. Diversions of this magnitude could adversely affect instream flow of the Verde River within the study area.

It is our concern that potential CAP-SRP water exchanges not be precluded or unduly complicated by Verde River designations. The potential impacts on instream flow resulting from Verde River diversions should be analyzed prior to designations, since such diversions could affect the river values for which designation is proposed.

①

144

Specific comments on the content of the report follow:

②

Page 17, par. 7--Verde Hot Springs is a popular recreation area and, as evidenced by the remains of the lodge and spa, has excellent potential for recreational development. Would designation preclude private recreational development at the hot springs, or would such development already be precluded under Forest Service land management criteria?

③

Page 25, par. 1--The most recent data on eagles disagree with your figures. We suggest that they be checked. Thirteen nesting territories have been identified in Arizona and New Mexico by Dr. Robert D. Ohmart of Arizona State University.

The present development in the Verde River study area does not threaten eagles, nor is it expected that development of private lands will impact the eagles in the future due to the remote location of the nests.

④

Page 28, par. 2--The referenced report indicates that the Verde Hot Springs area has potential for direct use of the geothermal resource. Would designation limit or preclude development of this geothermal resource?

⑤

Page 55, par. 3--The paragraph on livestock grazing indicates that designation may impose constraints on the construction of cattle enclosures necessary for the establishment of young cottonwood trees. What is the nature of these constraints?

Page 57, par. 4--The primary threats to eagles in the study segments are recreation disturbances and cattle grazing. Since recreation will increase under the alternatives and grazing will remain the same, the sum of the impacts on eagles and other endangered species is viewed as being adverse.

Appendix Listing--The discussion on endangered plants is totally in error. One cactus, *Enchinocereus triglochidiatus* var. *arizonicus* has been listed as endangered (FR 44, No. 208, October 25, 1979) as opposed to your listing it as "proposed endangered." The Endangered Species Act of 1973, as amended, requires that all Federal agencies whose actions may affect an endangered species enter into consultation with the U.S. Fish and Wildlife Service to determine the effect of the action on the species. There is no indication in your draft EIS that this consultation process has been carried out.

The other 18 plants on your list were withdrawn from consideration because they did not meet the requirements of the 1979 amendment to the Endangered Species Act (FR 44, No. 45, March 6, 1979). Two plants are listed incorrectly: *Echeveria orpenti* should read *Crotopetalum rusbyi*; and *Agave bella* should read *Agave Toumeyana* var. *bella*. *Perilyc saxicola* should be listed as "nominated threatened" as opposed to "proposed endangered".

⑥

Considering the inaccuracies and false impressions in the discussion and the appended list, these sections should be either entirely rewritten or eliminated from the draft EIS. The final EIS should discuss your consultation process and the findings of the U.S. Fish and Wildlife Service for *E.t.* var. *arizonicus*.



Supplemental evaluation for the effects of the proposal on the identified Water and Power and Department of the Interior programs, as well as consideration of the above specific comments, would improve the overall quality of the review document.

Sincerely,

*Edward M. Hallenbeck*

FOR Edward M. Hallenbeck  
Project Manager

Forest Service Response to Water & Power Resources Service comments.

1. We agree that an exchange of CAP water for Verde River water would have an impact on maintaining the water flow in the river. However, as stated on page 22 of this document, it would be impossible to determine the actual affects until the allocations are made and an exchange proposed. See Central Arizona Project (CAP) section in Appendix D.
2. The permitted activities or development of Verde Hot Springs would be determined by the Management Plan which would be completed if the river is designated into the National Wild and Scenic Rivers System. See section C, Management Plan on page 69. Future development of the Hot Springs would not be prohibited by designation. However, should it be determined through normal Forest Service procedures that development is desirable, some restrictions would be necessary to comply with the scenic classification of that portion of the river.
3. We have corrected our statement on page 25 of the document to reflect 13 bald eagle nesting territories in Arizona and New Mexico. Thank you for bringing this error to our attention.
4. Designation would not preclude geothermal development of the Verde Hot Springs. However, developments adjacent to the river channel must be compatible with the Scenic classification. Also, other necessary developments would have to be located outside of the river corridor.
5. Designation would impose minor constraints on fence locations. New fences would be located out of sight of the river channel when possible.
6. The Threatened and Endangered Plants Listing in Appendix B has been revised. The section also includes a consensus statement regarding the need for consultation with the U.S. Fish and Wildlife Service.



Department of Energy  
Washington, D.C. 20585

86-821101  
FS

August 15, 1980  
10:39

Dear Mr. Secretary:

Honorable Bob Bergland  
Secretary of Agriculture  
Washington, D.C. 20250

Dear Mr. Secretary:

This is in response to your August 26, 1980, letter requesting comments on the proposed report/draft environmental impact statement recommending designation of two segments of the Verde River for inclusion in the Wild and Scenic Rivers system.

Pursuant to Section 4(b) of the Wild and Scenic Rivers Act, we offer the following comments:

- ① ° The proposed study/draft environmental impact statement does not clearly discuss the impact of a Wild and Scenic River designation on the Childs Power Generating plant located within the study area. In addition, hydroelectric and other energy resource potential of the area cannot be properly evaluated because investigations will not be complete for sometime.
- ② ° The proposed report/draft environmental impact statement does not specifically address the energy resource potential of the study area or the impacts of development on energy resources. An estimated 15,280 acres of land is currently withdrawn from mineral entry by water-power withdrawals. Under Alternative C, an additional 7,160 acres would be subject to regulations imposed by the Wild and Scenic River Act. Geothermal and hydroelectric resource potential as well as oil, gas, helium, and uranium potential has been identified. These potential resources and the impact on them from designation of the Verde River should be quantified through further study.
- ③

We appreciate this opportunity to provide comments and look forward to receiving a copy of the final environmental impact statement.

Sincerely,

*Ruth C. Clusen*  
Ruth C. Clusen  
Assistant Secretary  
for Environment

Forest Service Response to Department of Energy's comments:

1. See page 57 for the affects on Child's Power Plant.
2. See Appendices C and D.
3. Since there are no firm proposals for mineral development and there was insufficient time to undertake the kind of study you propose, we had to rely on other agency's help and data, especially the USGS. We have reviewed their mineral potential data for the area and have amended the various mineral portions of the document accordingly.



United States Department of the Interior

OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20240

DEC 10 1980

345

LMP

In Reply Refer To:  
ER 80/942

Honorable Bob Bergland  
Secretary of Agriculture  
Washington, D.C. 20520

Dear Mr. Secretary:

We are pleased to provide our comments on the draft environmental statement and wild and scenic river study for the Verde River, Yavapai and Gila Counties, Arizona. The report is clearly written and attractively presented. However, we question the designation of Alternative A (No Designation) as the National Economic Development Alternative. Economic (Cost-Benefit) analyses of the four proposed alternatives do not appear to conform to the Water Resources Council (WRC) Principles and Standards for Planning Water and Related Land Resources. Specifically, Table 5 does not identify the period of analysis for the proposed action costs and benefits listed (Section IV, F of the WRC Principles and Standards). Nor have the costs (scenic acquisition, recreation and transportation facilities development) been discounted to permit comparison of annual benefits as annual, average, or Year 1 of plan implementation. Furthermore, increased recreation and service generated income can serve as the basis for the National Economic Development Objective (Section V.B. 1(2)). Comparison of discounted benefits and costs is appropriate to determine which, if any, of the alternatives actually qualifies as the NED alternative. We recommend selection of Alternative D (Designation of all eligible segments).

In regard to the Summary of Criteria Satisfaction (Table 2, page 33), a determination that the geology of the river study segments does not possess "outstandingly remarkable" values should be reconsidered. Enclosed is a brief and map for Hackberry Mountain Caldera, a potential National Natural Landmark. Significant geologic features are described in the brief, including a variety of volcanic--erosional--depositional features located in the Verde River canyon.

We encourage efforts to identify cultural resources and the development of measures designed to prevent damage and vandalism to the resources in the area. This should be done in consultation with the State Historic Preservation Officer (Mr. James E. Ayres, Arizona State Parks Board).

06 - 817309  
FS

④

Honorable Bob Bergland

2

Recreation development proposed in concert with wild and scenic river designation should include consideration of the problems, needs and solutions presented in the Arizona Comprehensive Outdoor Recreation Plan. The Arizona Outdoor Recreation Coordinating Commission, Arizona State Parks Board, the appropriate Regional Councils of Government, and the Gila and Yavapai Counties Park and Recreation Departments should be afforded the opportunity to participate in the planning and development of recreational facilities along the river segments.

Additional comments are enclosed. I hope that these comments will be of assistance to you in finalizing the Verde River environmental statement and study report.

Sincerely,

*James E. Rediesberger*  
James E. Rediesberger  
Special Assistant to  
SECRETARY

14513

Enclosures

Forest Service Response to U.S. Department of Interior comments:

1. Due to the number of comments received regarding the NED alternative, the study team re-analyzed the NED account and concluded no true NED alternative exists. See statements on pages 39, 40 and 49.

The period of analysis for the proposed action costs has been entered as footnote 1/ on Table 5. Thank you for bringing this oversight to our attention.

2. See Forest Service response to the Arizonans for Wild and Scenic Rivers letter in this Appendix section. Based on the results of the workshop, the team concluded the river did not possess "Outstanding Remarkable" geologic values.

3. On pages 52 and 70. The need to identify and protect cultural resources is discussed. This would be done in consultation with the State Historic Preservation Officer.

4. The various recreation groups would be contacted during the writing of the Management Plan.

General Comments

Mineral Values

Pages 27, 48, and 51. We believe that it is incorrect to state that the land withdrawn for waterpower purposes is not open to mineral entry. Public Law 359 of August 11, 1955 (49 Stat. 691), permits the mining, development, and utilization of the mineral resources of all public lands withdrawn or reserved for power development except those lands "(1) which are included in any project operating or being constructed under a license or permit issued under the Federal Power Act or other act of Congress or (2) which are under examination and survey by a prospective licensee of the Federal Power Commission, if such prospective licensee holds an uncancelled preliminary permit issued under the Federal Power Act authorizing him to conduct such examination and survey with respect to such lands and such permit has been renewed in the case of such prospective licensee more than once."

Furthermore, it appears that parts of the area being considered for classification in the Wild and Scenic River System are also valuable for oil, gas, and sodium compounds. A lack of clear definition of just what areas are under consideration for classification, however, makes it difficult to be specific about mineral values.

Page 28. The Verde Hot Springs should be shown on a map or their location described in the text. The 120°C reservoir temperature supposedly reported by the U.S. Geological Survey (no reference citation is given) is probably very optimistic. Our interpretation of geothermic calculations based on the water chemistry suggests that reservoir temperatures do not exceed 90°C and very likely do not exceed 50°C.

Two mineral properties are mentioned on page 36 but are not precisely located on any map or in the text itself. Also, a copper prospect is located in segment A, United States Mines, in sections 27 and 28, T. 18N., R. 1E.; a quarry in NE 1/4 section 31, T. 18 N., R. 2E.; and a gravel pit, SE 1/4 section 31, T. 18N., R. 2E. In river segment B there is another gravel pit, 1/4 section mile north of Beasley Flat in SE 1/4 section 27, T. 13 N., R. 5 E.

It would be helpful to show mineral locations on the river segment maps and expand the discussion under L. Minerals and Geothermal.

Water Resources Development

A potential dam and reservoir site exists between Pauldin, Arizona, and Sullivan Lake for a viable diversion of Verde River water for the city of Prescott. Central Arizona Project water would be supplied to downstream users with prior water rights through exchange agreements. Even though the dam and reservoir site appears to be north of the river segments under consideration, impoundment and diversion may affect

downstream flows and should be considered during the decision-making process for the Wild and Scenic River designation for the Verde River.

Format

Page IX, Figure 1. Communities and recreation areas identified in Section II. C (pages 7 and 8) should be included.

Page 18, Section II. H. Recreation. The RARE II Wilderness Study areas should be shown in a separate figure.

Pages 35 and 36, Section III. H.1. Land uses described in the study segments should be included in the figures on page 14 and 15.

An analysis of the alternatives would be easier if features discussed in the narrative such as tributary streams, access roads, and springs had been included on the river maps provided on pages 14, 15, 41, 42, and 43.

Specific Comments

Page IV, "Preferred Alternative" is misspelled.

Forest Service Response to U.S. Department of Interior comments:

5. The study team oversimplified the withdrawal situation by lumping the various withdrawals into "withdrawals for waterpower purposes." We have corrected the draft to show the most restrictive withdrawal the Reclamation Withdrawal.
6. See page 3 for description of study area (1/4 mile on each side of the river).
7. The location of the Verde Hot Springs is shown on the river segment B map, page 15. The information regarding the temperature of the Hot Springs was provided by the State of Arizona, Bureau of Geology and Mineral Technology (James C. Witcher, September 27, 1979).
8. The mineral properties have been included on the location maps on pages 14 and 15.
9. See Appendices C and D.
10. The maps have been revised as you suggested.



DEPARTMENT OF THE ARMY  
LOS ANGELES DISTRICT, CORPS OF ENGINEERS  
P. O. BOX 2711  
LOS ANGELES, CALIFORNIA 90008

SPLED-E

24 November 1980

Mr. Donald H. Bolander, Forest Supervisor  
United States Department of Agriculture  
Forest Service, Prescott National Forest  
P.O. Box 2549  
Prescott, Arizona 86302

Dear Mr. Bolander:

This is in response to a letter from your office dated 26 August 1980 which requested review and comments on the "Verde River Draft Environmental Statement (DEIS) and Wild & Scenic River Study."

It is not clear if the Verde River section from Table Mountain to Tangle Creek is included in the study area. According to statements on pages 1 and 37, it is included and yet it is not discussed in the alternatives. Page 44 notes that this formerly represented Alternative E which was subsequently eliminated from consideration because of flood control facilities. Since the Corps of Engineers is no longer considering this area for a dam site under the Central Arizona Water Control Study (CAWCS), it appears that it should be considered as an alternative once again and discussed in the DEIS in the same manner as the other four alternatives.

Are the average flows as listed on page 21 great enough such that they will maintain fish and wildlife? Also, can increased recreational use be reasonably expected based on these flows? These considerations should be discussed in the DEIS.

Discussion should be presented in the DEIS as to what type, if any, of recreational uses will be permitted within the designated areas. Discussions of restricted uses within wild and scenic areas as well as the recreational area should be presented in the DEIS.

Reference is made to Section J, Fish and Wildlife, page 21, last subparagraph. This should be amended to indicate the position, if any, that has been taken by Arizona Game & Fish Department as to where they would like to consider reestablishing the otter. Reestablishment of the otter and increased recreational use would be in direct conflict, if they are in the same designated area.

⑤

Since the area between Segment A and Segment B is not included for designation within the study area, problems might arise from the discontinuous designation. For example, if inner-tubers or other recreationalists decide to use the area how will they be kept from entering private lands below Segment A? It is conceivable that trespassing could become a problem.

The wild and scenic designation of the 72.5 miles of the Verde River will have no impact on the Central Arizona Water Control Study especially since the Tangle Creek portion has been dropped from our studies.

Thank you for the opportunity to review and comment on this document.

Sincerely,

*Norman Arino*  
NORMAN ARINO  
Chief, Engineering Division

Forest Service Response to Department of the Army's Comments.

1. Your interpretation of how the river section between Table Mountain and Tangle Creek was treated in the report is correct. The Tangle Creek section was evaluated with the south portion of river segment B and found to possess "Outstanding Remarkable" values. It qualified for wild classification, as noted under item B on page 37. The Tangle Creek section was eliminated from consideration during the alternative formulation process. As stated in your letter, the reason for excluding the Tangle Creek section is no longer valid. Therefore, we have reconsidered adding the river section back into the Preferred Alternative. See page 44.
2. The river has demonstrated over the years that it can support the current fish and wildlife populations. Also, the existing recreation use as well as the projected use could be considered light as compared to other rivers located near populated areas. For these reasons and considering the Forest Service already has the responsibility to maintain fish habitat and the authority to control recreation use, it was decided that information other than provided in Section V, Effects of Implementation, page 45 was not needed to support the recommendations in this study.
3. As stated on page 69, a management plan would be prepared for the river if it is designated into the National Wild and Scenic Rivers system. A determination would be made at that time as to permitted recreation activities and the necessary controls. It is doubtful that more than a few minor changes would be necessary except for off-road travel. See page 48.
4. Refer to Arizona Game and Fish Department's letter under Alternative B of this appendix section for their position on establishment of the river otter. Determining the exact area for reintroducing the otter along the Verde River is outside the scope of this study.
5. Discontinuous designation of the river would not create a trespass problem that does not already exist. As noted in the report, river segment A has limited potential for floating or boating. These types of activities are generally restricted to river segment B below Camp Verde where trespass on private lands is a minor problem.

3.28-7 (4) 5

November 18, 1980

Mr. Donald H. Bolander  
Forest Supervisor  
U. S. Department of Agriculture  
Forest Service  
Prescott National Forest  
P. O. Box 2549  
Prescott, Arizona 86302

Dear Mr. Bolander:

Thank you for sending us a copy of the Verde River Draft Environmental Statement and Wild & Scenic River Study. We have reviewed it thoroughly and believe it is a good study.

Arizona Public Service Company, as you know, is a certificated utility. This means we are legally bound to serve all persons who request service and who meet the terms and conditions set up by the Arizona Corporation Commission. This is why we already have several distribution and transmission lines crossing the Verde River.

We are concerned about our ability to operate, maintain or replace these facilities with major facilities, when required. It is not clear from the EIS how your proposed designations on the river would affect our ability to do these things. The EIS states that it would be possible to establish a corridor paralleling the boundaries of the classified river sections, but we are certain it will be necessary to also provide for future river crossings.

We would most definitely be interested in participating in the management plan which will be prepared. I presume you will be asking for public input. If so, will you please place the two people listed below on your mailing list for any future notices concerning further actions on this subject:

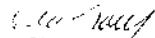
Ms. Judith Imhoff  
Arizona Public Service Co.  
P. O. Box 21666  
Phoenix, Arizona 85036

Mr. Donald H. Bolander  
November 18, 1980  
Page 2

Mr. Jesse Thomas  
120 N. Marina Street  
Station 4717  
Prescott, Arizona

Again, thank you for giving us the opportunity to comment to this statement.

Very truly yours,

  
R. E. Kary, Ph.D., Manager  
Environmental Management

REK:RF:cah

Forest Service Response to Arizona Public Service Company's comments.

A portion of the summary of affects on page 57 has been rewritten to more specifically cover your concerns. As requested, we have also added the two people's names to our mailing list.



United States  
Department  
of Agriculture

Rural  
Electrification  
Administration

Washington  
D.C.  
20250

OCT 02 1980

SUBJECT: Draft Environmental Impact  
Statement  
Verde River, Arizona

TO: Charles R. Hartgraves  
Director, Land Management  
Planning  
U.S. Forest Service

In response to your request, our staff has reviewed the referenced impact statement and offers the following comments:

1. There should be some discussion regarding the effect of river category designation and the potential for a transmission line to cross the river. On page 58 it states that utility corridors would be permitted immediately adjacent to classified areas; however, there is no discussion of a transmission/distribution line crossing a classified area.
2. On page 28, it states that the Verde Hot Springs has little potential for electrical power generation, but the area has potential for direct use of the geothermal resource. The potential for direct use of this resource should be discussed in more detail. The economics and feasibility of utilizing the Verde Hot Springs geothermal source should be examined.
3. On Table 3 (page 45) the Forest Service's preferred alternative (Alter. C) would preclude the development of reservoirs on the Verde River in the study area. There should be a discussion on reservoir development and potential site identification.
4. There is no discussion on water usage or withdrawal by power plants or other projects that may be sited above the designated area.

Thank you for the opportunity to comment. Should you have any questions, please contact Dennis Rankin at 447-7447.

CHARLES T. CROWLEY  
Chief, Environmental Services Branch  
Environmental and Energy  
Requirements Division

Forest Service Response to Rural Electrification Administrations' Comments.

1. We have revised page 57 to include new transmission lines.
2. Since there are no firm proposals for geothermal development and there was insufficient time to undertake the kind of study you propose, we had to rely on other agency's help and data, especially the USGS. We have reviewed the existing data and have amended the various geothermal portions of the document accordingly.
3. See CAWCS section in Appendix C.
4. See Appendices C and D.



DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, D.C. 20410

OFFICE OF THE ASSISTANT SECRETARY  
FOR COMMUNITY PLANNING AND DEVELOPMENT

SEP 16 1980

Honorable Bob Bergland  
Secretary of Agriculture  
Washington, D. C. 20250

Dear Mr. Secretary:

This is in response to your letter to Secretary Moon Lavigne dated August 26, 1980 regarding your proposed Verde River Draft Environmental Impact Statement and Wild and Scenic River Study Report, Yavapai and Gila Counties, Arizona. In accordance with 24 CFR Part 56 Protection and Enhancement of Environmental Quality, Department of Housing and Urban Development procedures, particularly Section 50.61 of our Regulations, we are forwarding this document to the HUD Regional Environmental Officer in our San Francisco Regional Office. He will review and comment as appropriate, directly to you by your due date.

Thank you for providing us the opportunity to review the above Draft Environmental Impact Statement.

Sincerely,

Robert C. Emby, Jr.  
Assistant Secretary



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
215 Fremont Street  
San Francisco, Ca. 94105

Project #D-AFS-R61051-AZ

Donald H. Bolander, Forest Supervisor  
Prescott National Forest  
P.O. Box 2549  
Prescott, AZ 86302

Dear Mr. Bolander:

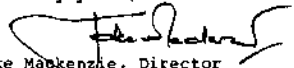
The Environmental Protection Agency (EPA) has received and reviewed the Draft Environmental Impact Statement (DEIS) titled VERDE RIVER DRAFT ENVIRONMENTAL STATEMENT AND WILD AND SCENIC RIVER STUDY.

The EPA's comments on the DEIS have been classified as Category LO-1. Definitions of the categories are provided by the enclosure. The classification and the date of the EPA's comments will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed Federal Actions under Section 309 of the Clean Air Act. Our procedure is to categorize our comments on both the environmental consequences of the proposed action and the adequacy of the environmental statement.

The EPA appreciates the opportunity to comment on this DEIS and requests five copies of the Final Environmental Impact Statement when available.

If you have any questions regarding our comments, please contact Susan Sakaki, EIS Review Coordinator, at (415) 556-7858.

Sincerely yours,

  
Jake Mackenzie, Director  
Surveillance and Analysis Division

Enclosure

Environmental Impact of the Action

LO--Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

ER--Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EU--Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1--Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2--Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3--Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

FEDERAL ENERGY REGULATORY COMMISSION  
WASHINGTON 20426

In Reply Refer To:

OEPR-DHRA  
Federal Project Review  
Verde River Wild and Scenic  
River Study

OCT 23 1980

Mr. Charles R. Hartgraves  
Director, Land Management Planning  
Forest Service  
U.S. Department of Agriculture  
Washington, D.C. 20013

Dear Mr. Hartgraves:

This is in response to your letter of August 26, 1980, requesting comments on the draft environmental impact statement and wild and scenic river study on the Verde River, Yavapai and Gila Counties, Arizona.

We have reviewed the draft report to determine the effects of the proposal on the Commission's responsibilities under the Federal Power Act, Natural Gas Act, and other authorities. Such responsibilities relate to the licensing of non-Federal hydroelectric power projects, participation in the planning of Federal water and power resources projects, and the regulation of construction and operation of natural gas pipelines.

According to the material furnished, 78 miles of the Verde River designated for the study in the Wild and Scenic Rivers Act, as amended, would be eligible for inclusion in the National Wild and Scenic River System. However, the proposed action in the report would designate only 72.5 miles of the river. Of the 72.5 miles, 33 miles would meet criteria for a recreational river, 22 miles would meet scenic river criteria, and the remaining 17.5 miles are suited for a wild river classification.

The powerhouse and appurtenant facilities of the existing Childs hydroelectric project, licensed by the Commission as Project No. 2069, are located within the scenic area. The Childs powerplant operates with water taken from Fossil Creek, a tributary of the Verde River. Operation of this project would not be affected by the proposed designation. There are no known potential hydroelectric projects within the study area.

Mr. Charles R. Hartgraves

-2-

An examination of the available information indicates that two pipeline companies own pipelines that may cross the Verde River. El Paso Natural Gas Company operates a 20-inch diameter pipeline in Yavapai County that runs from Ash Fork south to Prescott. Southern Union Gas Company operates a small 4-inch diameter pipeline in Yavapai County that runs from Jerome north-southward to Sedona.

There does not appear to be any oil or gas exploration or development in the project area. Some exploration activity is expected to the south and west of the proposed wild and scenic river designations.

In conclusion, based on information contained in the draft environmental statement and wild and scenic river study, there does not appear to be any conflict between the recommended proposal and matters pertaining to the Commission's responsibilities.

Sincerely,

  
William W. Lindsay, Director  
Office of Electric Power Regulation



pk-758761  
FS



THE SECRETARY OF COMMERCE  
Washington, D.C. 20230

SEP 11 1980

320

LTD

SEP 15 3:18

Dear Bob,

Thank you for your letter transmitting a copy of the report/draft environmental impact statement on the proposed addition of a segment of the Verde River into the National Wild and Scenic Rivers System. This document has been referred to the Office of Regulatory Policy for coordination of review and comment.

We appreciate the opportunity to review this document and will be in touch with you if we have any comments concerning it.

With best wishes,

Sincerely,  
*Phil*

Secretary of Commerce

Honorable Bob Bergland  
Secretary of Agriculture  
Washington, D.C. 20250

TO:

State Mine Inspector  
Room 705, West Wing  
Capitol  
Phoenix, AZ 85007

FROM: Arizona State Clearinghouse  
1700 West Washington Street, Room 505  
Phoenix, Arizona 85007

State Application Number: IS&M

SEP 9, 1980 State AZ No 80-80-0055

Mineral Resources	Health
Game & Fish	Power
Transportation	Water
Ag. & Hort.	Parks
Mine Inspector	Land
Arid Lands Studies	AORCC
Center for Public Affairs	
Prescott Historical Society	
Museum of Northern Arizona	
Public Safety	
Renewable Natural Resources	
Bd. of Geology & Mineral Tech.	
Salt River Indian Clearinghouse	
DEPAR: M. Nrona	
P. Bergthold	
R. Hathaway	
Arizona Natural Heritage Programs	
Region III	
Region V	

This project is referred to you for review and comment. Please evaluate as to the following question. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 12 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-8004 if you need further information or additional time for review.

Reviewer as this project  Project is supported as written  Comments as indicated below

1. Is project consistent with your agency goals and objectives?  Yes  No  Not Pertinent to this agency
2. Does project contribute to statewide and/or areawide goals and objectives of which you are familiar?  Yes  No
3. Is there evidence of duplication with other state agency or local responsibilities and/or goals and objectives?  Yes  No
4. Will project have an adverse effect on existing programs with your agency or within project impact area?  Yes  No
5. Does project violate any rules or regulations of your agency?  Yes  No
6. Does project adequately address the intended effects on target population?  Yes  No
7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar?  Yes  No

Additional Comments (Use back of sheet, if necessary):

255-333-3-?

1/1 2/1

Reviewers Signature *James H. McCall*

Date September 11, 1980

Title State Mine Inspector

153

APPENDIX G

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ENVIRONMENTAL IMPACT STATEMENT

Verde River

Wild and Scenic River Study Report  
Yavapai and Gila Counties, Arizona

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