VERDE RIVER

Wild and Scenic River Study
Report and Environmental Impact
Statement
ENVIRONMENTAL IMPACT STATEMENT

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

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

Congressional Delegates

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

County

*Gila County Board of Supervisors
Yavapai County Board of Supervisors
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 Everall  
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  
* AWWW-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.
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 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.

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.
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.

1/ Arizona Office of Economic Planning & Development - Phoenix, Arizona
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 prehistoric 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, 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 way 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 intermingled. 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 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 substandard 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.

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.
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, blue-gill, 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 3/ 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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Fishing along the Verde River west of Perkinsville private lands - Prescott National Forest

James Cowlin, 1980
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/

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.


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

* (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 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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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.

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.
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 9/, 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.

9/ 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.


TABLE 1a
SUMMARY OF OWNERSHIP, RESTRICTIONS, AND USES

River Segment A

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Length of Segment</td>
<td>38.5 miles</td>
</tr>
<tr>
<td>2. Gross Acres in Study Area</td>
<td>12,320 acres</td>
</tr>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

River Segment B

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Length of Segment</td>
<td>50.0 miles</td>
</tr>
<tr>
<td>2. Gross Acres in Study Area</td>
<td>16,000 acres</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Criteria Satisfied</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scenic Value</td>
<td>Yes</td>
</tr>
<tr>
<td>Recreational Value</td>
<td>No</td>
</tr>
<tr>
<td>Geologic Value</td>
<td>No</td>
</tr>
<tr>
<td>Fish and Wildlife Values</td>
<td>Yes</td>
</tr>
<tr>
<td>Historic and Cultural Values</td>
<td>Yes</td>
</tr>
<tr>
<td>Free-flowing River</td>
<td>Yes</td>
</tr>
<tr>
<td>Meaningful Experience Opportunity</td>
<td>Yes</td>
</tr>
<tr>
<td>Water Volume</td>
<td>Yes</td>
</tr>
<tr>
<td>Water Quality</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Scenic Value: The Verde River does possess "outstandingly remarkable" scenic values. Evaluation of scenic qualities using the Forest Service Visual Management System [1/ 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.

1/ 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.

-33-
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.


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.


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.

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 exclosures 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 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.
ALTERNTIVE 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.

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<td>-</td>
<td>-</td>
</tr>
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<td>1,190</td>
<td>1,190</td>
<td>1,190</td>
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</tr>
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<td>-</td>
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</tr>
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<td>+</td>
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<td>NA</td>
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<td>Roadless Areas</td>
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</tbody>
</table>

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>
<thead>
<tr>
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<th></th>
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<tbody>
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<td>3,200</td>
<td>4,984</td>
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<td>5,996</td>
<td>6,191</td>
</tr>
<tr>
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<td>6,000</td>
<td>8,440</td>
<td>9,683</td>
<td>10,047</td>
<td>10,376</td>
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<tr>
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<td>7,995</td>
<td>9,573</td>
<td>10,216</td>
<td>10,470</td>
</tr>
<tr>
<td>Dispersed Motorized Recreation</td>
<td>1,100</td>
<td>1,595</td>
<td>1,500</td>
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<td>0</td>
</tr>
<tr>
<td>Dispersed Nonmotor Recreation</td>
<td>900</td>
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<td>1,615</td>
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<td>1,741</td>
</tr>
<tr>
<td>Hunting</td>
<td>2,000</td>
<td>2,407</td>
<td>2,547</td>
<td>2,547</td>
<td>2,547</td>
</tr>
<tr>
<td>Non-hunting Wildlife</td>
<td>800</td>
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<td>1,336</td>
<td>1,459</td>
<td>1,504</td>
</tr>
<tr>
<td>Fishing</td>
<td>5,700</td>
<td>7,705</td>
<td>9,732</td>
<td>10,101</td>
<td>10,236</td>
</tr>
<tr>
<td>TOTAL</td>
<td>25,200</td>
<td>35,571</td>
<td>41,548</td>
<td>42,273</td>
<td>43,065</td>
</tr>
</tbody>
</table>

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 in-depth 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 fledgings.

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;III, 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**

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
</tr>
</thead>
<tbody>
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<td>Outdoor Recreation (RVU's) 2/</td>
<td></td>
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</tr>
<tr>
<td>Picnicking</td>
<td>4,984</td>
<td>5,562</td>
<td>5,596</td>
<td>6,191</td>
</tr>
<tr>
<td>Camping</td>
<td>8,440</td>
<td>9,683</td>
<td>10,047</td>
<td>10,376</td>
</tr>
<tr>
<td>Water-based Recreation</td>
<td>7,995</td>
<td>9,573</td>
<td>10,216</td>
<td>10,470</td>
</tr>
<tr>
<td>Dispersed Motorized</td>
<td>1,595</td>
<td>1,500</td>
<td>200</td>
<td>0</td>
</tr>
<tr>
<td>Dispersed Nonmotorized</td>
<td>1,300</td>
<td>1,615</td>
<td>1,707</td>
<td>1,741</td>
</tr>
<tr>
<td>Hunting</td>
<td>2,407</td>
<td>2,547</td>
<td>2,547</td>
<td>2,547</td>
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<tr>
<td>Wildlife-Nonhunting</td>
<td>1,145</td>
<td>1,336</td>
<td>1,459</td>
<td>1,504</td>
</tr>
<tr>
<td>Fishing</td>
<td>2,705</td>
<td>9,732</td>
<td>10,101</td>
<td>10,236</td>
</tr>
<tr>
<td><strong>Total Annual Visitor Days</strong></td>
<td>35,571</td>
<td>41,548</td>
<td>42,273</td>
<td>43,065</td>
</tr>
</tbody>
</table>

| 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    |

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<thead>
<tr>
<th>Domestic Livestock</th>
<th></th>
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<td>1,190</td>
<td>1,190</td>
<td>1,190</td>
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<tr>
<td>Annual Costs</td>
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<td>5,600</td>
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<td>225,000</td>
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<td>Annual Maintenance</td>
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<td>$2,041,500</td>
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<td>0</td>
<td>$13,000</td>
<td>$23,000</td>
<td>$25,000</td>
<td></td>
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</table>

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/ RVU's - Recreation Visitor Days, 12-hour use period.
4/ Acres currently withdrawn from mineral entry by Reclamation Withdrawals.
5/ See footnotes at the bottom of pages 39 and 56 for definition of Scenic Easements.
### TABLE 6
EFFECTS ON COMPONENTS OF THE EQ ACCOUNT

<table>
<thead>
<tr>
<th>Components</th>
<th>Alternative A</th>
<th>Alternative B</th>
<th>Alternative C</th>
<th>Alternative D</th>
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<tr>
<td>Free-Flowing River</td>
<td>Option to develop water and power projects remain open.</td>
<td>17.5 miles protected as wild; 22 miles protected as scenic.</td>
<td>17.5 miles protected as wild; 22 miles protected as scenic; 33 miles protected as recreation.</td>
<td>17.5 miles protected as wild; 22 miles protected as scenic; 33 miles protected as recreation; 38.5 miles protected as recreation.</td>
</tr>
<tr>
<td>Maintain and Protect Bald Eagle Habitat</td>
<td>Loss of habitat from private land development and inundation could occur.</td>
<td>Habitat will be protected in segment B.</td>
<td>Habitat protected in all but 5.5 miles of study area.</td>
<td>Habitat protected in entire study corridor.</td>
</tr>
<tr>
<td>Protect and Preserve Historical Archaeological Sites</td>
<td>Protected by current laws.</td>
<td>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.</td>
<td>Classification assures protection of water quality and quantity.</td>
<td></td>
</tr>
<tr>
<td>Maintain Water Quality and Quantity</td>
<td>Existing State and Federal law would be applicable.</td>
<td>Only those lands within segment B of the study area would be subject to constraints associated with the Wild and Scenic Rivers System.</td>
<td>A total of 72.5 miles the river would be subject to constraints associated with the Wild and Scenic Rivers System.</td>
<td>All the area within the study area would be subject to constraints associated with the Wild and Scenic Rivers System.</td>
</tr>
<tr>
<td>Maintain Scenic Qualities</td>
<td>Natural beauty and open space on private land currently regulated by local zoning only.</td>
<td>A total of 72.5 miles the river would be subject to constraints associated with the Wild and Scenic Rivers System.</td>
<td>Assures long-term options for nonconsumptive uses in all but 5.5 miles of the study corridor.</td>
<td>Assures long-term options for nonconsumptive uses in all but 5.5 miles of the study corridor.</td>
</tr>
<tr>
<td>Irreversible or Irretrievable Commitment of Resources</td>
<td>No assurances.</td>
<td>No assurances in segment A. Assures long-term options for nonconsumptive uses in segment B.</td>
<td>Assures long-term options for nonconsumptive uses in all but 5.5 miles of the study corridor.</td>
<td>Assures long-term options for nonconsumptive uses in the study corridor.</td>
</tr>
</tbody>
</table>
TABLE 7
ALTERNATIVE EFFECTS ON REGIONAL DEVELOPMENT

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td><strong>Gross Regional Product</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Generated</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agriculture (livestock)</td>
<td>121</td>
<td>136</td>
<td>142</td>
<td>144</td>
<td></td>
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<tr>
<td>Agriculture (other)</td>
<td>51</td>
<td>60</td>
<td>62</td>
<td>72</td>
<td></td>
</tr>
<tr>
<td>Trade &amp; Manufacturing</td>
<td>78,224</td>
<td>92,904</td>
<td>98,393</td>
<td>100,800</td>
<td></td>
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<tr>
<td>Minerals &amp; Energy</td>
<td>337</td>
<td>401</td>
<td>423</td>
<td>442</td>
<td></td>
</tr>
<tr>
<td>Services (Rec. &amp; Tourism)</td>
<td>100,913</td>
<td>119,998</td>
<td>126,901</td>
<td>129,885</td>
<td></td>
</tr>
<tr>
<td>All Other Economic Sectors</td>
<td>37,847</td>
<td>45,103</td>
<td>47,232</td>
<td>48,098</td>
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</tr>
<tr>
<td><strong>Total Product</strong></td>
<td>$217,493</td>
<td>$258,602</td>
<td>$273,153</td>
<td>$279,441</td>
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<tr>
<td><strong>Regional Income Generated</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agriculture (livestock)</td>
<td>32</td>
<td>36</td>
<td>37</td>
<td>38</td>
<td></td>
</tr>
<tr>
<td>Agriculture (other)</td>
<td>16</td>
<td>19</td>
<td>20</td>
<td>20</td>
<td></td>
</tr>
<tr>
<td>Trade &amp; Manufacturing</td>
<td>32,561</td>
<td>38,652</td>
<td>40,947</td>
<td>41,955</td>
<td></td>
</tr>
<tr>
<td>Minerals &amp; Energy</td>
<td>53</td>
<td>63</td>
<td>64</td>
<td>68</td>
<td></td>
</tr>
<tr>
<td>Services (Rec. &amp; Tourism)</td>
<td>52,463</td>
<td>62,488</td>
<td>66,103</td>
<td>67,635</td>
<td></td>
</tr>
<tr>
<td>All Other Economic Sectors</td>
<td>13,722</td>
<td>16,352</td>
<td>16,686</td>
<td>17,418</td>
<td></td>
</tr>
<tr>
<td><strong>Total Income</strong></td>
<td>$98,836</td>
<td>$117,610</td>
<td>$123,857</td>
<td>$127,134</td>
<td></td>
</tr>
<tr>
<td><strong>Regional Employment</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Generated (Person Years)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agriculture (livestock)</td>
<td>.005</td>
<td>.006</td>
<td>.006</td>
<td>.007</td>
<td></td>
</tr>
<tr>
<td>Agriculture (other)</td>
<td>.002</td>
<td>.002</td>
<td>.003</td>
<td>.003</td>
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<tr>
<td>Trade &amp; Manufacturing</td>
<td>4.561</td>
<td>5.414</td>
<td>5.736</td>
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<td></td>
</tr>
<tr>
<td>Minerals &amp; Energy</td>
<td>.003</td>
<td>.003</td>
<td>.004</td>
<td>.004</td>
<td></td>
</tr>
<tr>
<td>Services (Rec. &amp; Tourism)</td>
<td>10.199</td>
<td>12.181</td>
<td>12.898</td>
<td>13.198</td>
<td></td>
</tr>
<tr>
<td>All Other Economic Sectors</td>
<td>1.55</td>
<td>1.848</td>
<td>1.93</td>
<td>1.965</td>
<td></td>
</tr>
<tr>
<td><strong>Total Employment</strong></td>
<td>16.320</td>
<td>19.454</td>
<td>20.574</td>
<td>21.055</td>
<td></td>
</tr>
<tr>
<td>Component</td>
<td>No Action</td>
<td>Alternative A</td>
<td>Alternative B</td>
<td>Alternative C</td>
<td>Alternative D</td>
</tr>
<tr>
<td>----------------------------</td>
<td>-----------</td>
<td>---------------</td>
<td>---------------</td>
<td>---------------</td>
<td>---------------</td>
</tr>
<tr>
<td>Recreation Experience</td>
<td>Little change from existing status. Could be some gradual decline due to private lands limiting access to river.</td>
<td>All but 5.5 miles of study area would be retained in near natural condition. Better access would increase number of recreationists.</td>
<td>Alternative B would be protected in near natural condition. Improved access in segment B would encourage more recreation use.</td>
<td>Full length of river would be retained in near natural condition. Better access would increase number of recreationists.</td>
<td></td>
</tr>
<tr>
<td>Freedom of Travel</td>
<td>Some improvement, however many of the current access problems would remain.</td>
<td>ORV travel restricted on study segment B. Improved road and trail access in segment B.</td>
<td>ORV travel restricted on all but 5.5 miles of study area. Improved road and trail access to both segments.</td>
<td>ORV travel restricted.</td>
<td></td>
</tr>
<tr>
<td>Private Ownership Rights</td>
<td>Private land rights constrained only by State law and county regulations.</td>
<td>Very limited impact on private land rights.</td>
<td>Moderate impact on private land rights.</td>
<td>This alternative would have the greatest impact on private land rights.</td>
<td></td>
</tr>
<tr>
<td>Tax Base</td>
<td>Tax base would not be affected.</td>
<td>Very slight decrease in tax base.</td>
<td>Acquisition of scenic easements could produce a much greater reduction in the tax base but less than Alternative D.</td>
<td>Acquisition of scenic easements could have the greatest reduction on the tax base.</td>
<td></td>
</tr>
<tr>
<td>Life, Health, Safety</td>
<td>Neutral for this component.</td>
<td>Neutral for this component.</td>
<td>Neutral for this component.</td>
<td>Neutral for this component.</td>
<td></td>
</tr>
<tr>
<td>Emergency Preparedness</td>
<td>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.</td>
<td>No change from Alternative A except approximately 5,600 acres would be withdrawn from mineral leasing.</td>
<td>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.</td>
<td>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.</td>
<td></td>
</tr>
</tbody>
</table>
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 exclosures 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

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

++ 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
rivers 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 assurance 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 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 that 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.


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

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<th>Respondent Represented</th>
<th>Total Respondents</th>
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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

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<th>Alternatives</th>
<th>Total Respondents</th>
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**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 affect 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 U.

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 canadenesis)*

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
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/

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<th>Plant Species</th>
<th>Nominated For Federal Protection 2/</th>
<th>Category 1 3/</th>
<th>Category 2 4/</th>
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<td>Perityle saxicola</td>
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<tr>
<td>Agave toumeyana var. bella</td>
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<tr>
<td>Eriogonum ripleyi</td>
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</tr>
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<td>X</td>
<td></td>
</tr>
<tr>
<td>Cheilanthes pringlei</td>
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</tr>
<tr>
<td>Cimicifuga arizonica</td>
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<td>X</td>
<td></td>
</tr>
</tbody>
</table>

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

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) 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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2/ 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
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, R5E, 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 tailrace 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.
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).

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 is 15 cubic feet per second (see page 21 of report). The average

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:

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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:

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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

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Richard Rhea, District Ranger, Verde Ranger District
Charles Snyder, Forest Engineer
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John Bohning, Range and Wildlife Staff
Bruce Lamb, Recreation and Lands Staff
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Prescott National Forest (Continued)

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

Coconino National Forest

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Jack Utley, Timber Staff
Loyd Barnett, Watershed and Soils Staff
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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
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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 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
Jim Bergstrom, Cottonwood 86326
Joe Harrcock, Cottonwood 86326
Mr. & Mrs. Jay Roseberry, Thatcher
Hans Odelberg, Camp Verde 86322
A. J. Mackey, Camp Verde 86322
Harold Avery, Camp Verde 86322
Herschel Lewis, Lake Montezuma
James Sheltrow, Lake Montezuma
Mr./Mrs. O.D. Arrowsmith, Mesa 85203
Jo Thomson, Sun Lakes
Frank Macek, Sun City 85375
Marlin Ranck, Lake Montezuma 86342
Cleo Tissaw, Cottonwood 86326
Jerry Torstveit, Phoenix 85006
J. L. Varga, Sun City 85351
Doyt Hirl, Camp Verde 86322
Mrs. R. E. Hargus, Camp Verde
Diana Ward, Camp Verde 86322
Paul Webb, Rimrock 86335
Imogene Heiskell, Camp Verde
Phyllis Teque, Camp Verde
Evelyn Renner, Cottonwood
Teri Owen, Camp Verde 86322
Florence Gonzales, Camp Verde
W. J. Raithel, Scottsdale
Shirley Barnes, Camp Verde
Betty Lovett, Camp Verde 86322
Marjorie Lacey, Camp Verde
Anna Sawers, Camp Verde 86322
Loft Hollamon, Camp Verde
Harold Friedman, Camp Verde
Mr./Mrs. Lester Boren, Camp Verde

Clarence Finch, Camp Verde 86322
William Jik, Sedona 86336
William Thompson, Dewey 86327
Lois Hall, Camp Verde 86322
Merlyn Talbot, Camp Verde 86322
Florence Mackey, Camp Verde 86322
W. P. Meyer, Lake Montezuma 86432
Betty Lewis, Lake Montezuma 86432
Neil Landers (no town)
Mike Foree (no town)
William Foree (no town)
Edwin Wangberg, Sun City 85375
Larry Biller, Lake Montezuma
Mr./Mrs. Geo. Tissaw, Cottonwood
Betty Foree, Tempe 85283
Warren Carlson, Cottonwood 86326
Lorene Weed, Camp Verde 86322
Kelly Dunham, Prescott 86301
Pete Peterson, Prescott 86301
Virginia Webb, Rimrock 86335
Bud Teoque, Camp Verde 86322
Gene Hollamon, Camp Verde 86322
Paul Renner, Cottonwood 86326
O. E. Gonzales, Camp Verde 86322
Mary Denietman, Cottonwood 86326
Henry Skill, Lake Montezuma 86342
Joe Neff, Camp Verde 86322
Craig Lacey, Camp Verde 86322
W. F. Lacey, Camp Verde 86322
Paul Sawers, Camp Verde 86322
Dewayne Barnes, Camp Verde 86322
Pat Friedman, Camp Verde 86322
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
Glennora Hackett, Cottonwood
Charles Mead, Cottonwood 86326
Carroll Vientelman, 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 Selves, 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
Uoris 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, Sedona
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. Wait 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
Irina 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
Jesse Reeves, Camp Verde
John Edge, Camp Verde
Darwin & 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
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 these 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 until this watershed has been adjudicated, and the water rights of the State of Arizona, including claims to CAP water, have been filed 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 L. Fisher
State Land Commissioner

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 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 21.

3. We agree that it is impossible to determine what effect a new 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 D.
Mr. Donald H. Boltander
Forest Supervisor
P.O. Box 2549
Prescott, Arizona 86302

Dear Mr. Boltander:

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.

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 a destination 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, Geologist
Gary A. Dashney, Civil Engineer

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.

Concerning the safety of Horseshoe Dam, we have been told that it is ideally 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), is taken into consideration the safety of Horseshoe Dam to the extent the existing structure would be breached.

The water currently being stored for SRP purposes would be held in the new Cliff Dam. See CAWCS section in Appendix C.
November 28, 1980

Mr. H. Dewayne Morgan
Forest Planner
Prescott National Forest
P.O. Box 2049
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 Draft Environmental 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

This statement is prepared in response to the Draft Environmental Impact Statement on the Verde River. We propose that this statement contains assumptions and conclusions that have no basis in fact, or were arrived at based upon incomplete 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 Alternative C is the preferred 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 regarding the impact of the proposed alternatives in the statement 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 of exceptional scenic, recreational, or other values as wild rivers in their natural 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 Congress in the state or states through which the river flows that are found by the Secretary of the Interior, upon application 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.
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 Pavilion 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."

Sections 4 of the Act provides the procedures 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 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 which will result from classification of the river, particularly under Alternative C. (See pages 58, 60, 62, 64, 65, 66, 67.) Particularly, from page 60 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."

From 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.
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 Forest Service, in its comments submitted to the drafters of the statement, indicated that a preference for designation (Alternative A). There are many other interested groups, such as the Verde Valley Audubon Society who the statement indicates are interested in protecting the Verde River. There is no discussion of this important issue in the statement.

The method used by the drafters of the statement to determine support is not indicated. Actual comments submitted to the drafters were not included in the statement, and it is unclear what public support exists for the designation. Neither, actual numbers of comments and other interested people should be included rather than local residents. The exclusion of this information and statistics are necessary to support a conclusionary statement such as the one cited above that appears in the statement.

**Conclusion**

This Position Statement contains specific challenges to the accuracy and adequacy of the information and analysis contained in the Draft Environmental Impact Statement on the Verde River. It contains specific references to defects in the scope and content of the statement which are not supported and further analysis 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 conclusion 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, and 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 controlled if the area is included in the National Wild and Scenic Rivers System. That this study be conducted in conjunction with any water resource 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 continue under the control of the Prescott National Forest and the limited number of private landowners.

Forest Service Response to Rev. A 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 5 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 controlled 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 riparian 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 result 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 61 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.

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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.
The Verde River Draft Environmental Impact Statement, to which we refer as the Blue Book, was brought to our attention in late October, 1980. Although we are not the only private property owners on Segment C 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 3, 1980 cut-off date set by the Prescott National Forest. However, we have collected information from (1) National Forest personnel; (2) the Salt River Project; (3) the Arizona Fish & Game Association; (4) the Audubon Society; (5) various individuals from Camp Verde and private landowners from Segments A and C; and (6) the Verde and Power Resources Service. Because we have hiked, backpacked, camped and fished the Verde River from Bean Town to the East Verde's beginning and back to Kachina Dam, during all seasons of the year, we believe we are acquainted with the Verde River below Camp Verde. We have learned what we have learned from experience, not from reading. 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.

Recommend: [Both]

Discussion: The Blue Book indicates the Forest Service plans to increase the supply of outdoor recreation opportunities and access through Forest Service programs that emphasize dispersed recreation (page 38). This is supported by the proposed budget figure of $425,900 for development costs of recreation facilities and $370,000 for costs of road development (page 51). Also during an interview Mr. Morgan, Planner suggested there would be a "large" increase in use during the first few years. Mr. Knox, Forest Ranger estimated there would be a "500%" increase in use during the first few years. 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, not dispersed especially, but also dispersed, will be adverse upon the wildlife and especially the bald eagle. This is recognized by your statement on page 60, "River destination with the improved access would increase the number of recreational visitors. This increase could have an adverse impact on wildlife, specifically the nesting bald eagle...."

The efforts thus far have been to hide the agencies and downplay the public's attention to their location. The selection of Alternative C will reverse that effort. Brown Springs Road (PFEPA) passes through an area of maximum interest to those people focused on preserving and improving their habitat. From personal observation we can state there has been a steady decrease in motor traffic on FS 9574 over the past 20 years. It is surprising to us to know there isn't an accurate count on motor, foot, horseback and boat traffic has not been done in this wild area. There never has been heavy traffic in the river corridor by foot, horseback or boat on the Verde River in 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, 45, 46, 47, 48, 49, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67). Also the advantages of Alternative A is clearly stated on page 72 in this regard, "Alternative A avoids recreation use stimulus for classification."

Therefore, we believe one of the most serious errors of the Blue Book is that Alternative C is the only 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.

Recommend: Correction or deletion of statement:

"During the study period, the primary issue arising from the study involved a "should" the study concern 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, 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 77)

Discussion: The Verde River is a major consideration for inclusion in the system at the request of Congressman Maurice Udall. That is common knowledge. We object to the attempt of the Blue Book to justify this study by implying it is in the public's interest. We believe it would be difficult for you to document significant widespread interest in this proposal being brought up for study in the study list above. An exception would be the Audubon Society which you have not included in your above list. The Salt River Project relies on a statement made by 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.

Recommend: (1) A change of wording reporting under "Summary of Comments Received". (Page 77)

(2) A correction in the statement that all private landowners were contacted in person 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 of 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 law.

To support our contention we reviewed the roster of those 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 an interview with Mr. Morgan, Planner, he stated that the Forest Service tends to regard 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 we 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 be the facade of 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 results of the numbers would be better tabulated as (1) Local - or Verde Valley (2) from within Arizona (3) from without Arizona (4) members of Audubon Society (5) number of Sierra Club (6) state or federal government employee.

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

DISCUSSING FLOODING: The Blue Book Planner states that there are certain environmental advantages to the passage of the Proposal. In response to direct question as to why the Forest Service convinced that Alternative C is preferable over A - Dewey Morgan, Planner, replied that it would eliminate any future dams on the Verde River. However, page 16 points out "Floodings in the Salt River Valley below the confluence of the Verde and Salt Rivers in the past three years have ... 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 CANCS study". This draft does not include any input from the governments of the cities that are dramatically affected by those floods. There is no statement from the CANCS since December, 1975, 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 Box site has been mentioned as a viable alternative to the Dam. The question of whether or not this proposal is adopted will keep necessary flood control for the Salt River Valley.

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 new trees, the scouring away of alluvial shelves and vegetation, the total altering of the river bottom from a green belt to a boulder-strewn wasteland has to be considered. This topic is not discussed in the Blue Book. The impact of the flood on Downstream lives and future, 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 6) This figure is misleading of the total, over $1 million is allocated for annual purchase of land. 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. In our suggestion, since the maximum cost for scenic easements will be in Segment A, we recommend an appraisal of representative riverfront 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 towards the improvements. (Page 36)

DISCUSSION: Brown Springs Ranch is a 500-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 stone barn, and a storage shed, a hydroelectric system, and have installed an extensive underground domestic and irrigation water system. About a half mile of road is cut in to the property. We have an operating permit on the National Forest although the surrounding area is known as Brown Springs Addition. Small grain crops, pasture, wool 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 in the river's edge as noted on page 36. Not only access to a graded FS Road #574 also known as Brown Springs Road.

Recommend: That the final report include a statement specifically warning us of ungravelled access to Brown Springs Ranch via FS Road #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 50, “Twisting roads and trails will be evaluated and upgraded or closed as needed to provide safe, reasonable public access or protect the values which cause the river to be added to the National Wild and Scenic Rivers System.”

On page 6 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 4576, Brown Springs Road is the only road to Brown Springs Ranch, and since Brown Springs Ranch is the only private property affected in Segment A by the proposal, a direct statement assuring the owners of the property of unrestricted access should be included in the final statement.

John W. Morgan
1/4/86

Forest Service response to Mr. & Mrs. John W. Morgan’s comments.

1. See Forest Service response to the position argument submitted by Jack A. Howard on behalf of Mr. & Mrs. John W. Morgan.

2. The primary issue statement in Subsection B, 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 7 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 employee 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 7 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 Mr. Morgan (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 considering how public comments were to be used was "written form that status 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 Impact Statement were considered in preparing the Final Environmental Impact Statement.

6. See summary report of flood control activities along the Verde River in Appendix E.

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 NIA 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 is negotiated with individual landowners.

8. The reference on page 30 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, a staff visit would be outside the scope of this study. Therefore, we have elected to respond to this request through normal request service protocol. I trust the response you have received to date has not 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, or D.

We, 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 newspaper 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 and 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.
considering the need for further development, data on the available funds was used to make the cost estimates available in the appropriate cost tables.
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 prevent, without the landowner's permission, any current regular use described prior to the acquisition of the easement. Scenic easements are purchased at the fair market value.
Pre~cutt Prescott, Dear Sir:

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

November 19, 1980

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 21,600 recreational visitor days. Having property on the Verde and having spent a lot of time on the river over the past 15 years, I believe this figure to be greatly 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 (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 general, is swimming. The river is too shallow for tubing, canoeing, or boating. I make this statement without fear of contradiction because I have rared four children who have on numerous occasions tested the above without success.

Looking further at Table 4, the increase in recreational visitor days from 1978 to 1990 (under Alternative C for paddling, camping, and water-based recreation) amounts to 11,559 recreational 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 U.S. is going 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 visitor day for initial construction in the implementation of Alternative C. Using the same scenario, Alternative B would cost $933,500 and would result in an increase of 17,196 recreational visitor days, for a "per KBD" implementation cost of $54.35. 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 me to be saying to the government that it should cut out costly ineffective programs. I cannot believe that any individual would now 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 this program 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 56%, than 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 10 years without the government spending any money.

Alternative C adversely impacts 717 acres of private land.

Alternative C adversely impacts 1,200 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 permitted operating a cattle business on the forest. These comments are still applicable and are attached hereto as a part of my official response.

Very truly yours,

David R. Gipe

1150 Avenue C

Yuma, Arizona 85364

(602) 783-8658
David R. Gipe
1150 Avenue C
Yuma, Arizona 85364
(602) 783-6638

July 7, 1979

Mr. Donald H. Bolander
Forest Supervisor
Prescott National Forest
P.O. Box 2149
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 Dwayne 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 divided land on the river. There would be increased traffic flow, increased pressure to own property, and impairment of ownership by limiting the 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 property. 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 could 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 data for fishing use which reduced the total estimated recreation use to 25,300 UVP. The necessary corrections have been made in both TABLES A and B. We agree that recreation use on the Verde Ranch and other private lands located in the north part of the river segment A. However, the river use near Clarkdale, Verde 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 Recreational" river values to qualify for an increase in visitation use days. The increases in visitation 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 seems 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 E is perhaps more cost effective than Alternative G. However, it should be noted that the cost of acquiring scenic easements on private lands is in 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, days, and diversions. See section B, Classification Criteria and Determination on page 26.
Leonard Staff, Jr., D.O.
DISTRICT ATTORNEY

DSTEDP.

ur,
November 22, 1980

De Wayne Morgan
Forest Planner
Prescott National Forest
P.O. Box 2549
Prescott, Ariz. 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., D.O.

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

Leonard Staff Jr., D.O.

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 controlled, 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
Member of Congress

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

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) Possession of approximately 33,210 acres of land on the river banks as "wilderness."
3) Lost economic value to private ownership, mining, timber, fishing 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
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, acquisition 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
Chairman of the Board

November 7, 1980

John Edge
Chairman

Henry Simonsgaard
Secretary-Treasurer

Werner Meyer

Charles Van Gorder

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

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.

Phillips 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 designated 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 even Forest Service multiple use management has been waiting. The case for the burgeoning management requirements, that accompany Wild, Scenic or Recreational 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 23 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 exclusions in sensitive areas are already included under present management plans and these exclusions would be constructed "without constraints that may be imposed by designation," as stated in the report.

The report also states that "existing water rights 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 archaeological 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 archaeological sites would apparently be less likely to occur with a continuation of present management options.

Present Management across the dual objectives of proper economic development and environmental quality. Both have been served effectively in the past. Any Wild or 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. Cole
Chief Geologist &
Resident Agent

November 10, 1980

Kei Prescott, Forest
Mr. Donald H. Bolander
your
Statement
The following
Prescott
Dear Mr. Bolander:
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 designated 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
even Forest Service multiple use management has been waiting.
The case for the burgeoning management requirements, that
accompany Wild, Scenic or Recreational 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
23 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

...
Alternative B (Prefer Designation of River Segment B)

Arizona Wildlife Federation

Arizona Resource Council

Arthur Geldon, Flagstaff 86001
Marie Wheat, Camp Verde 86322
November 11, 1980
Forest Supervisor
Prescott National Forest
P.O. Box 2549
Prescott AZ 86302

Regard 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 then 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 public's access and enjoyment.

Because of the possibility of a dam being built just south of the Table Mtn. area on the Verde River we would suggest that the wild designation 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 involved in its food supply.

Respectfully Submitted,

Tom Camp, Vice President
Arizona Wildlife Federation
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  A. W. Scott, Prescott 86301
Mrs. Buster Estes, Sedona 86336  Bert Leper, Clarkdale 86324
David Duckett, Prescott  
Peri Harkins, Prescott  
May Overton, Prescott  
Francis Moore, Prescott  
George Pearson, Prescott  
Larry Langstaff, Tempe  
Peter Corbett, Clarkdale  
Marcia Herriott, Clarkdale  
Bill Fleishmann, Prescott  
Lester Womack, Prescott  
Bert 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 Vaughts, 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 Loake, 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
November 21, 1980

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

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 wild & scenic portions of the draft document, however, we do have several specific suggestions that would more accurately depict species occurrence and resource values.

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.

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

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
- 1 -

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.

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 13-17

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 25-27

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 58

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

Sincerely,

Robert A. Jantzen, Director
Habitat Evaluation Coordinator
Planning and Evaluation Branch

cc: Levi Packard, Supervisor, Flagstaff Regional Office

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 25.

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 to 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 Regional Forest
P. O. Box 2549
Prescott, Arizona 86301

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

No such question was included in previous SRP comments.

Page 4, Fourth Paragraph: 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.

Page 35, Eighth Paragraph (Segment B):

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 E, South Section):

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.
Page 2
November 21, 1980

Page 27, Section C. Criteria for Evaluating Alternatives:

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.

Page 41, Footnote: The change from the original "study segment A" 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 B (proposed for Recreation designations) and the upper portion of Segment A (proposed for Scenic designations) could be made unusable as potential sites for coal-fired power plants and water exchanges by Verde Valley residents for GNP 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.

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 at no road access except to road. 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 River designations per se, we see, as mentioned above, concerns 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 affected by such designations, the Salt River Project will not oppose it.

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 suggest that this effect may occur on the Verde River, should it be designated, with resultant water quality problems and other environmental impacts. This Draft EIS 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 affect the existing stream gaging stations or the operation and maintenance actions that will be associated with them.

Sincerely,

[Signature]
Glenn E. Norris
Environmental Services Department
SRP

Forest Service Response to Salt River Project's comments:

1. The primary issue statement in sub-section D on page 5 has been revised to reflect your concern.

2. The importance of the Wild and Scenic Rivers Act requires a Management Plan to be developed for each river included in the National System. This document will be based on more in-depth 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 criteria for evaluating the project 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—e.g., 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 Elimination from Further Consideration.

7. The fifth paragraph on page 37 has been rewritten to reflect your concern.

8. See the last paragraph on page 47.
November 26, 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.

1. 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.

2. 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 #183), 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.

3. 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 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 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.

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

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
President

November 26, 1980

Mr. Donald H. Bolander

1. We have added the localities to the river segment maps on pages 13 and 19. Thank you for bringing this oversight to our attention.

2. The section on Alternatives Eliminated From Further Consideration on page 44, has been revised. See 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.
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 E 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 30). 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 8 & 9. 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 needs died out...."

EDGAR T. BOSWELL SEP 3 1980
Director Basin and Area Planning

Forest Service Response to Soil Conservation Survey's comments:

1. Due to the number of comments received regarding the NED alternative, the study team reanalyzed the NCE account and concluded no true NED alternative exists. See statements on pages 30, 31 and 46.

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 continued reforestation regardless of designation action taken.

3. We have made the change on page 10 as suggested. Thank you for your concern.
neighbor swimming area near the springs. As it 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 area, with a miscellaneous number from Tucson and occasional visitors from as far away as Minneapolis and Washington. I believe that the number of people willing to swim a fairly long distance (an excess of 2 miles) with a significant distance of shot rock indicates that the area also provides "outstanding," if not "remarkable" recreational opportunities.

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 was the "outstandingly remarkable" recreational opportunities that they provide, in their use as a "clothing optional" area despite our national Parks Service regulations to the contrary. These regulations, which are put into effect in 1972, have different meaning. 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 the regulations should be rescinded and the area, at least in the viewing of the heating pool, be officially designated as at least as a "clothing optional" area. Verde Hot Springs in the Verde River forest of the Lower Verde River, provide a very pleasant area for recreation for each and all people. The "clothing optional" people are the ones who use most of the maintenance of the area. Picking up trash, carrying out trash, cleaning the Pavilions, fields, 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 the Sabino Reservoir and Thumb Cave: the Verde Springs Road (15 miles) and the Chuck Road (15 miles). The PMPB Road (15 miles) up from Camp Verde, a very long, very hot and, since road requiring high clearance, almost dry, and very careful driving. The Thumb Road (15 miles), which begins across the Verde River is now north of Chuck, is shorter but no better. The old road, 15 miles, starts south of Chuck.

Improving any one of the 3 roads does come in to the Verde Hot Springs area, probably any increase the recreation at Verde Hot Springs. Improving the Thumb Road (15 miles) does provide an element of safety. However, current access to this area is on the northeastern side of the mesa while the springs are on the southwestern side. During spring months there is considerable danger to people heading to cross the mesa to get to the springs. An improved Thumb Road would provide access to the springs without a river crossing.

Sometimes I like to be quietly visited at Verde Hot Springs before the rest of the study and say increase in crowding and they might discourage too. Many people are currently using the area and sanitation facilities are needed for amount of health.

I am also concerned about the effect of recreation at a "Sandy River" on the ecological area in the area. The report has very little to say on this subject although there are numerous sites in the area. Improved access to the area for recreation will would mean an increase in the number of "pot hunters" to the area also.
I believe that the Environmental Statement should mention the range of protection, intervention, research, and even regulations in these sites. Over the years, the site of Verde Creek has almost been destroyed. I also believe that the matter of Verde River research should be addressed. I recently went through all of the year 1980 for regulation changes to find the policy at the Verde Hot Springs resort. My concern is that many of my historical data on this area from Catmanoo Train to Hotels Creek exists.

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

Sincerely,

[Signature]

[Name]

Forest Service Response to Tom'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 88 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 750
Prescott, Arizona 86302

Dear Mr. Morgan:

In response to the National Forest Service's request for reactions and comments on 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 ensure 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,

[Signature]

Andy Tomlinson
City Manager

City of Prescott
P.O. Box 2698, 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 16 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,

[Signature]

Regional Representative

NATIONAL AUDUBON SOCIETY
P.O. BOX 2837 • BOULDER, COLORADO 80307 • 303/447-0219

October 29, 1980

Mr. H.O. 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 16 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,

[Signature]

Regional Representative
Dear Sir:

Enclosed are our comments and selection of a desired alternative to the Draft E.I.S., as mentioned 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 of private interest only or are in areas not visited by the majority of visitors or users, this value cannot be totally overlooked. This is especially true if said values are compromised by development, mining, and electrical facilities or water/flood control impoundment devices. Similarly, scenic elements, 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 ever be equated in dollar values comparable to effects of the 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 in the National Wild and Scenic River Inventory.

VERDE RIVER—Here again, the value of this too cannot be computed in a positive value. Interior conditions during flooding, revenue from electrical devices or dams, and irrigation values may easily be computed. However, as our wild and scenic rivers are protected, the economic values a viable measuring stick as to the total value of a river. We believe they are not. Other measures must exist to ascertain the flood control/flows, hydro-electrical devices, and fish and aquatic recreation. This must include some heavy demand on the river's water or diminished fish species.

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 all toxic farming, fertilizer, phosphates would seriously reduce scenic 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/generation issues and needs that would only permit increasingly adverse impacts as the goes on, economic and recreational demands and activities would serve to significantly decrease wildlife values, numbers, and quality both of understand and endangered species. High voltage transmission lines, should they be constructed in this area, would serve to no increased benefit to fish and aquatic. As this now
Involve a high number of wild species, this species would be significantly adversely impacted. Changes in water level, depth and quality would drastically affect the food chain of western chub in further decreases in their numbers. Further natural phenomena and habitat loss. As such heated planet or satellite habitats, elevation of the Verde River to the Wild and Scenic designation would come to realize or decrease these factors.

We propose the alternative included in the Verde River System as the alternative for both habitat values in all respects in all respects, as shown by the following needs and criteria:

1. Cultural Values: This is a valuable product within the Wild and Scenic concept. This activity can be used to achieve social values and social management needs. Efforts and means improvements of opportunities should be controlled by broad movement decisions and practices.

2. Recreational Use: While it is possible that this feature 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 human numbers to a reasonable number, to limit intrusion on wildlife values, yet permit adequate recreational needs.

3. Access: Reasonable access to usable areas within the Wild and Scenic areas is acceptable and necessary. Surely, access to areas already existing
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 concede economic growth of any fashion where viable, without compromising wildlife values or concepts as in this study. While some constraints, restrictions and complications will affect landowners within the plan concept, the values preserved and enhanced in the long run will become more significant in their own right and future generations.

We therefore consider and select alternative "D" 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

Dear Sir:

I am writing to comment on the Verde River Wild & Scenic Regional Study and the majority of the Environmental Impact Statement. I have found it from the training the river's free flowing condition. I feel these habitats are desirable and warrant protection. However, I question the need for obtaining property 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.U. 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
Randy Bergan, Flagstaff

Michael Berry, Tucson
W. Gary Lockrow, Flagstaff
Douglas Hulmes, Prescott
C.J. de Ward, Tucson
Joni Bosh, Phoenix
Mike Borgen, Prescott
Philip Latham, Prescott
Kathaleen Fletcher, Prescott
Joanne Mees, Prescott
Marianne Locke, Prescott
Joel Barnes, Prescott
Kate Udall, Prescott
Maria Patterson, Prescott
19 September 1980
2620 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 fauna occurring in the Verde River and along the proposed corridor.

The spikedace, Heda fulgida, although once widespread in the Cilia 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 mile reach near the river bridge on FS 225A, 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 small fauna, several ordinate, 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 Brown Spring, and I am sure several other species are present in the proposed corridor. I would suggest you contact Mr. Jerry Landre, 365 E. Janison, Flagstaff, an expert on southwestern smalls. Additional information on these interesting invertibrates.

Additionally, in response to the overall plan, I would prefer to see Alternative B implemented, followed by C and D. I find Alternative A unacceptable.

Sincerely,

C. O. Niering

Forest Service Response to C.O. Niering's comments:

Thank you for bringing the spikedace to our attention. We have included the additional information on page 52 in the Appendix.
protection.

The reasons given for selecting Alternative C over D are spurious: 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 tabulates 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 these sites will be protected just as they are now by current laws.

The table on page 53 shows that alternative D would clearly generate the most economic benefits, yet the table on page 63 shows D having a negative influence on local area economic growth (point 6). This inconsistency should be clarified.

Point three on that table is somewhat confusing. It appears that the assessment of impacts is not based on kind of impacts, but the net amount is being affected. It must argue that the minimal constraints in designation should not be assumed compounded of the number of parcel holdings affected is nine instead of seven.

The computations used to protect
new data (page 46) should be shown as the reader cannot 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 corridor. This would be especially important for the proposed "election of study area A".

The report gave welcome recognition to the protection of wildlife habitat. Perhaps the final report could provide a listing of regulations and their operation, which is independent of river designation.

I'll be looking forward to the final report.

-- Jim R.
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 characteristics of private ownership on the 5.5 miles near Floodo, I will trust your judgment in selecting 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 Sprague 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 bold eagle, golden eagle, black hawk, and the highest species diversity of birds in AZ along the Verde. The recreational potential for Whitewater rafting and anything 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 protect and preserve the Verde, recreational, and ecological values of this river.

Sincerely,

Douglas Holcomb
Professor of Environmental Studies

---

To: Prescott National Forest
From: Douglas Holcomb
Date: October 3, 1980

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 characteristics of private ownership on the 5.5 miles near Floodo, I will trust your judgment in selecting the wisest choice.

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I have noted bold eagle, golden eagle, black hawk, and the highest species diversity of birds in AZ along the Verde. The recreational potential for Whitewater rafting and anything 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 protect and preserve the Verde, recreational, and ecological values of this river.

Sincerely,

Douglas Holcomb
Professor of Environmental Studies
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
Arizonaans for Wild & Scenic Rivers
The IZZZAK Walton League of America
Tucson Audubon Society
AWWW (Arizonaans 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 Valley
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 Thonesberry, 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
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 Florence 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 receive 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.

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 90% 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,

Theron Lane
Chairman

Forest Service Response to Theron Lane's comments:

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 confusion as to whether or not the river has "outstanding remarkable" recreation value, the study team decided to accept the workshop's recommendations.
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 Ensilry Flats and Horsetooth 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 sections between Table Mountain and Tanger Creek also designated between Table Mountain and Tanger 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 safest means 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 1975 we encountered one fence around 3 miles below Beasty Flats which was much more substantial than your usual "water gap" type fence. This one was made of 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 1975 and that fence was removed several weeks later. However, consideration for big spring floods 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 may have on this. I will be coming up with the Verde River and will then return in late January and will then return in late January and will then return in late January. My address will be 561 Lincoln Ave.

Sincerely,

Wayne D. VanWaynes
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 Bridge stretch.

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 N. Emrick
Chairman

[Signature]

November 24, 1980

Southern Arizona Environmental Council
P.O. Box 4065
Tucson, Arizona 85717

Phil Gilman, River Study Coordinator
Tonto National Forest
P.O. Box 13705
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 that is accomplished, we feel that the Forest Service will be able to propose more logical alternatives: (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.

[Signature]

Arlan M. Colton
President-elect, SAEC
January 9, 1980
Thank you for sending me a copy of the Draft Environmental Statement and Wilde and Barksdale

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Thank you for sending me a copy of the Draft Environmental Statement and Wilde and Barksdale
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. Recreational status for river from forest boundary near Beasley to Deardorff plus to total 35.3 miles. Included in the 33 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 Turtles Bridge.

Now that the Central Arizona Water Control Study has eliminated consideration both the enlargement of Horseshoe Dam and the Verde 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 an outstandingly remarkable but we disagree with you 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 alternative, Alternative C, would prevent this special capability from being utilized. If the private landowners are not informed properly, they can easily misinterpret 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 27, 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 short 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
November 7, 1980

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

Dear Don,

On behalf of NVW 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 and Scenic Rivers System.

The Verde is truly a remarkable river in the Southwest and should receive the utmost protection.

NVW FIRST supports Alternative II with the addition of the river below Table Mountain to the head of Cranmore Reservoir as well.

We also support wilderness designation for all CADIS II areas adjacent to the Verde.

We oppose future visitor development or improvement of access to the river.

Sincerely,

Donavan H. Lyngholm
Box 103
Flagstaff, AZ 86002

November 7, 1980

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 Prumont to Beasley Flats (38.5 miles). We ask for scenic designation for the 22-mile section from Beasely Flats to the junction of Fossil Creek and Wild designation for the 27.5 miles between Sheep Bridge below Tanger Creek.

Sincerely yours,

Donavan H. Lyngholm
Box 103
Flagstaff, AZ 86002
Dear Sir:

I wish to add my letter to you of last week concerning classification of the Verde River. I have just received information that plans on private properties are being dropped.

Therefore, I would like to recommend the following plan for classification:

Keep the Forest Service Alternative D be used for the classification, plus the portion of the river from Oak Creek to Sheep Creek where the classification exists. In other words, classify the river from the mouth of Oak Creek to Sheep Creek to 186, in addition to the lands of Alternative C.

Thank you for including this as my earlier recommendation for classification of the Verde River.

Sincerely yours,

[Signature]

[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 303 575 7577 
J. R. Mitchell 
Public Lands Coordinator 

November 20, 1980 

Forest Supervisor 
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, oil and natural gas development activities have been successfully conducted concurrently 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 11-12 South and 86-7 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 the geothermal potential of this area is promising. The attached map shows 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 

The 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 concluded 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.
Mr. Donald H. Bolander
Forest Supervisor
Prescott National Forest
P.O. Box 1599
Prescott, Arizona 86302

Dear Mr. Bolander:

We have reviewed the Verde River Draft Environmental Statement and Wild and Scenic Study report. Our review was primarily with respect to any effects that the proposed action might 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 affected through water exchanges with the Salt River Project. On August 8, 1980, the Secretary of the Interior issued proposed allocations of CAP water for Indian use. These proposed allocations included three tribes which could take water from the upper Verde at its tributary: Hassayampa-Fresquez - 500 acre-feet per year; Camp Verde - 1,200 acre-feet per year; and Bateo-Abacon - 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 (Flagstaff and Payson) which could divert water from the east Verde or its tributary flow bowls. The AWC recommendations are currently being revised, but the October 1980 Department of Water Resources still recommendation for these five municipalities decrease from an aggregate of 4,515 acre-feet per year in 1975 to 10,194 acre-feet per year in 1985. Such decreases in the magnitude of water could adversely affect existing flow of the Verde River within the study area.

It is our concern that potential CAP-Salt water exchanges may not be precluded or adequately complicated by Verde River designations. The potential diversion of existing 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.

Specific comments on the content of the report follow:

Page 11, par. 2--Verde Hot Springs is a popular recreation area and, as evidenced by the presence of the Judge and ape, 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?

Page 22, par. 1--The most recent data on eagles disagree with your statement that they may be checked. Thirteen nesting territories have been identified in Arizona and New Mexico by Dr. Robert D. O'Callahan 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.

Page 23, par. 1--The referenced report indicates that the Verde Hot Springs area has potential for direct use of the thermal resource. Would designation limit or preclude development of this geothermal resource?

Page 25, par. 1--The paragraph on livestock grazing indicates that designation may impact management on the construction of cattle watering necessary for the establishment of new grassland areas. What is the nature of these constraints?

Page 26, par. 2--The primary threats to eagles in the study area are recreational disturbances and cattle grazing. Since recreation will increase under the alternative and grazing will remain the same, the risk of impacts on eagles and other endangered species as viewed as being advanced.

Appendix Listing--The discussion on endangered plants is totally in error. One listing (Cylindropuntia transylvanica) is incorrect as it has been listed as endangered (EB 54, Oct. 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 endangered species enter into consultation with the U.S. Fish and Wildlife Service to determine the effect of the actions 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 (EB 46, No. 45, March 6, 1979). Two plans are listed incorrectly: Echeveria agavoides should read Echeveria agavoides and Bacoa harleyi should read Bacoa lutea var. deltoidea. "Proposed endangered" is used as opposed to "proposed endangered/"

Considering the inaccuracies and false impressions in the discussion and the requested list, these sections should be either wholly 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 the draft EIS.
Supplemental evaluation for the effects of the proposal as 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,

[Signature]

Forest Service Response to Water and Power Resources Service comments:

1. We agree that an exchange of O.M. 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 effects until the allocations are made and an exchange proposed. See Central Arizona Project (CAP) section in Appendix B.

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 6, Assignment Plan on page 50. Future development of the Hot Springs may be prohibited by designation. However, should it be determined through normal Forest Service procedures that development is desirable, new 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 the above changes. We thank you for bringing this error to our attention.

4. Designation would not preclude additional 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.
In Reply Refer To:
ER A0/942

Honorablc Bob Bergland
Secretary of Agriculture
Washington, D.C. 20250

Dear Mr. Secretary:

We are pleased to provide our comments on the final environmental statement and draft and notice 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) analysis of the four proposed alternatives do not appear to conform to the National Economic Development Council (NED) Principles and Standards for Planning Water and Related Land Resources. Specifically, Table 11 does not identify the period of analysis for the proposed action costs and benefits (land Section IV, F of the NED Principles and Standards). We have the most (relative

... of volcanic--erosional--depositional features located in the Verde River canyon. A potential "Outstandingly Remarkable" geologic value should be reconsidered.

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 S. Ayen, Arizona State Parks Director].

The Arizona Outdoor Recreation Planning 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,

[Signature]

[Assistant to Secretary]

Sincerely,

Honorable Bob Bergland

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 Planning 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,

[Signature]

[Assistant to Secretary]

Sincerely,

Honorable Bob Bergland

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 Planning 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,

[Signature]

[Assistant to Secretary]
Even though the dam and reservoir site appears to be north of the river, Water Resources Development of Prescott would require relocation of Prescott. It would be helpful to show mineral locations on the river segment maps and expand the discussion under 7. Appendix C. Geothermal Water Resource Development.

A potential dam and reservoir site exists between Pauldin, Arizona, and Bullseye Lake for a viable diversion of Verde river water for the city of Prescott. Central Arizona Project water would be supplied to downstream areas with prior water rights through exchange agreements. Municipal properties have been included on the location maps on pages 14, 15, 41, 42, and 43.

General Comments

Mineral Values

Page 27, 40, 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 (69 Stat 681), permits the mining, development, and utilization of the mineral resources of all public lands withdrawn or reserved for power development except those lands ("I") 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 any prospective licensee of the Federal Power Commission. If such prospective licensees have an unexpired 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 Dill and Evans River Systems are also valuable for oil, gas, and mineral resources. A lack of clear definition of just what areas are under examination for classification makes it difficult to be specific about mineral values.

Page 20. The Verde Hot Springs should be shown on a map or their location described in the text. The 120°F reservoir temperature reported by the U.S. Geological Survey in reference citation is given is probably very optimistic. Our interpretation of geothermal temperatures based on the water chemistry suggests that reservoir temperatures do not exceed 90°C and very likely do not exceed 50°C.

The mineral properties are mentioned on page 50 but are not precisely located on any map or in the text. Also, a copper prospect is located in segment A, United States Mines, in sections 37 and 28, T. 18N., R. 2E.; a quarry in 36%4 section 31, T. 18N., R. 2E.; and a gravel pit, SE 1/4 section 31, T. 18N., R. 2E.; and a gravel pit, SE 1/4 section 31, T. 18N., R. 2E. In segment A there is another gravel pit, 1/4 mile north of Beasley Flat in 35%4 section 27, T. 15N., R. 5E.

It would be helpful to show mineral locations on the river segment maps and expand the discussion under 7. Appendix C. Geothermal.

Regional Development

7. The location of the Verde Hot Springs is shown on the river segment map, page 35. 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).

Specific Comments

Page 14, "Preferred Alternative" is also spelled.

The study team has modified the withdrawal situation by lumping the various withdrawals into withdrawals for waterpower purposes. We have checked 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 map, page 35. 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.
This is in response to a letter from your office dated 20 August 1987, which requested review and comments on the "Verde River Draft Environmental Statement (DEIS) and NEPA & Scenic River Study." 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 boaters or other recreationalists decide to use the area how will they be kept free 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 Project 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,

[Signature]

Donald R. Bolander
Deputy Chief, Engineering Division

Forest Service, U.S. Department of Agriculture

1. Discontinuous designation as proposed by the agency's staff.

2. The river has been authorized over the years that it can support the current fish and wildlife populations. Also, the missing 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 7, "Effects of Immediate Action," page 41 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 recreational activities and the necessary controls. It is probable that more than a few minor changes would be necessary except for off-road travel. See page 40.

4. Refer to Arizonaitem and Fish and Wildlife item on this appendix section for their position on establishment of the river segment. Determining the exact area for reconstructing the river after 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 A below Camp Verde where trespass on private lands is a minor problem.
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 definitely be interested in participating in the management plan which will be prepared. I assume 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 actions concerning further actions on this subject:

Ms. Judith Imhoff
Arizona Public Service Co.
P. O. Box 21666
Phoenix, Arizona 85026

Mr. Jesse Thomas
170 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

RE: RF-1279

Forest Service Response to Arizona Public Service Company's comments.

A portion of the summary of effects 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.
OCT 2 1980

United States Department of Agriculture

WASHINGTON, D.C. 20250

TO: Charles R. Hitch Graves  
SUBJECT: Draft Environmental Impact Statement  
Verde River, Arizona

Mr. Charles R. Hitch Graves  
Director, Land Management Planning  
U.S. Forest Service

In response to your request, our staff has reviewed the environmental 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 20, 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 economic and feasibility of utilizing the Verde Hot Springs geothermal source should be reviewed.

3. On Table 3 (page 8) 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 ruled above the designated area.

Thank you for the opportunity to comment. Should you have any questions, please contact Dennis Rankin at 447-7547.

Charles E. Martin  
Chief, Environmental Services Branch  
Environmental and Energy Requirements Division

Draft Response to Rural Electrification Administration's Comment:

1. We have revised page 57 to include new transmission lines.

2. Since there are no new 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 CAWC section in Appendix D.

4. See Appendices C and B.
Dear Mr. Bolander:

The Environmental Protection Agency (EPA) has received and reviewed the Draft Environmental Impact Statement (DEIS) titled YUKON RIVER DRAFT ENVIRONMENTAL STATEMENT AND ADDENDUM.

The EPA's comments on the DEIS have been classified as Category 0--I. Definitions of the categories are provided in the attached enclosure. The classification and the date of the comment is 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, EIA 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).

Recovery 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 action on the environment. EPA has requested that the originating Federal Agency 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 revisions be made to the draft statement.

If a draft impact statement is assigned a Category 3, no final is made of the project or action, since a basis does not generally exist on which to make such a determination.
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 of 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 or 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. Moreover, the proposed action in the report would designate only 72.5 miles of the river. Of the 72.5 miles, 15 miles would meet criteria for a recreational river, 22 miles would meet scenic river criteria, and the remaining 35 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.

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 northeastward 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,

[Signature]

William W. Lindsay, Director
Office of Electric Power Regulation
Thank you for your letter transmitting a copy of the report/article 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,

Honorable Bob Bergland
Secretary of Commerce
Washington, D.C. 20230

THE SECRETARY OF COMMERCE
Washington, D.C. 20230

FROM: Arizona State Council
1201 West Washington Street, Room 2100
Phoenix, Arizona 85007

STATE MAN INSPECTOR
Phoenix 705, West Wing
Capital
Phoenix, Arizona 85001

This report is referred to you for review and comment. Please evaluate it in the following areas:
1. Security of the project
2. Water quality
3. Public involvement
4. Impact on the environment
5. Environmental protection
6. Social and economic impacts
7. Compliance with laws and regulations

Please evaluate as to the following question: After evaluation, return THIS FORM AND THE ATTACHED COPY to the Secretary of the Interior within 15 working days from the date noted on the form. Please provide the Secretary with any additional information or additional time for review.

I certify that I have reviewed this document and will be in touch with you concerning any comments.

Secretary of Commerce

[Signature]

[Date]

[Return Address]

[Office of Regulatory Policy]

[Date]

[Return Address]
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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