



ARIZONA RIPARIAN COUNCIL

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Michael J Fink, Environmental Coordinator
U.S. Army Corps of Engineers
Los Angeles District
Arizona-Nevada Area Office, Planning Section C
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Dear Mr. Fink,

The Arizona Riparian Council (ARC) submits these comments concerning the Draft Feasibility Report and Environmental Impact Statement for the Rio Salado Oeste project. Now in our 20th year, the ARC is the state's major non governmental organization dedicated to the protection of riparian areas. Naturally, we are most interested in the issues as they relate to riparian habitat.

The ARC supports the Corps' mission for "ecosystem restoration" (5.3.1; page V-6) as it applies in the Draft Feasibility Report and Draft EIS. Furthermore, we support the three planning objectives (5.3.2, page V-7):

- Restore native riparian, wetland, and floodplain habitats and manage undesirable plant, fish, and wildlife species.
- Reduce flood damages to infrastructure and structures.
- Improve passive recreation and environmental-education opportunities.

In many places the two documents list the causes of riparian degradation and loss in the Salt River. This loss is attributable to many factors: dams and water storage reservoirs built first on the Salt River watershed, and then on the Verde River watershed; complete diversion of the base flow in the Salt River that reaches the Granite Reef Dam; pumping of groundwater that formerly contributed to base flow; improper condition of the upland watershed that now produces large spikes in flows, but less base flow; and the dams' capture of suspended solids, silt, and nutrients that formerly sustained the channel bed and riparian habitat through the Phoenix metropolitan area. Sand and gravel mining and the placement of landfills in the river channel have further degraded the river and riparian habitat. Agricultural and residential developments on the riverbanks have encroached into the floodplain. Water management laws of the state have been crafted to allow the removal of the entire natural base flow through the Phoenix area, further contributing to the loss of riparian habitats.

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While we wish to offer support to a project outcome that prospectively will return native riparian habitat to this reach of the Salt River, our enthusiasm for the Oeste project is somewhat tempered by the highly artificial nature of the habitat replacement. That is to say, the Oeste's proposed constructed riparian areas would be quite unconnected from the hydrologic and geologic functions of the Salt River and would be entirely dependent on ongoing inputs of water and management for its very sustainability. As proposed, the constructed habitat areas would be designed to function independently from the Salt River. We find this intentional separation troublesome because it further disconnects what ought to be linked in a true ecosystem restoration. The project as proposed promotes riparian habitat only through use of the leftovers – namely, the effluent from the 23rd Avenue wastewater treatment plant, urban stormwater runoff, and spillover from agriculture. The recommended alternative does little to promote naturally emergent riparian vegetation in the Salt River channel; instead, in the name of flood control, the alternative would apparently continue to remove the woody vegetation that emerges in the channel (although the document is not clear on this point).

The determination by the Army Corps of Engineers that discrete efforts to affect flood control by means of levees are uneconomical was a refreshingly forthright decision and one which we applaud. The fact that some of the habitat enhancement features will inadvertently assist flood amelioration is a welcome outcome. We believe that creation/designation of greenbelt zones along major southwest rivers that allow room for natural river processes to occur, including flooding, are the best type of flood control in any sufficiently long-term analysis.

The project will lead to the expenditure of some \$150,000,000 in construction costs that the Arizona Riparian Council does not think is the best way such a sum could be used in the arena of riparian management. We understand that these funds have eligibility criteria associated with their sources that limit their application, and that the requirement for a local partner to partially fund projects will always mean that such funds are expended in areas where local communities can implement them for local benefit. Still, such sums expended in the protection of watersheds, rehabilitation of headwaters, the purchase of sensitive lands or on projects that inherently reconnect the entire suite of natural processes that lead to healthy riparian systems would undoubtedly be better use of the funds from a riparian management perspective.

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In conclusion, we are in qualified support of the project in that it will provide a semblance of riparian habitat replacement in this reach of the Salt River and will offer an opportunity for the people of the Phoenix metro area to learn about riparian systems and enjoy them. Since the funds are not qualified to be used for projects that might more effectively restore riparian systems in a fundamental sense, this project should go forward with adaptive management and a commitment to making it the best project possible.

Thank you for considering our comments. Please add us to your correspondence lists for communications related to this project. We will be happy to participate further as the project develops.

Sincerely,

Tom Hildebrandt, President
Arizona Riparian Council