

Red Rock National Monument Proposal: Concerns and Alternative Plan

by Sandra Cosentino, September 10, 2015

(M.S. Land Use Planning & past experience as a recreation area plan project manager.

Sources: *Coconino National Forest Service planning documents, information from Coconino Forest staff, other research, observations from 25 years living in this area & going to area public meetings on land management issues.*)

The proposed Sedona Verde Valley Red Rock National Monument is the preferred plan of the private group proponent. I present this discussion of concerns, a possible alternative, and current forest management to illustrate there are other ways to address the issues of high use, funding shortfalls and land protections within existing forest management.

My research shows that the Red Rock Ranger District, Coconino National Forest, along with its private and government agency partners, has been effectively implementing the Amendment 12 to the

Sedona-Oak Creek Plan guidelines since adoption in 1998. This detailed plan and its implantation in the past 17 years has extensive pubic involvement.

Despite the increased visitation to Sedona and agency budget shortfalls of recent years, this ranger district has transformed visitor management, vastly increased developed sites (including a new state-of-the-art visitor center) and protections.

The key issue is deepening community-based support to advocate for increased funding for staff and maintenance.

Proposed Action to Create National Monument:

Keep Sedona Beautiful (KSB), a Sedona based non-profit conservation group, is in the process of preparing a proclamation and management guidelines to create the Sedona Verde Valley Red Rock National Monument to be managed by the Forest Service. KSB has stated they plan take it Departments of Interior and Agriculture for review by November 2015 and then to the President to sign by proclamation under the Antiquities Act.

For more information on KSB's assessment of need, map (which may be expanded), guidelines, past history of trying to establish this as a National Scenic Area, please see: <http://redrocknationalmonument.org>.

The site does not provide a copy of their proposed Proclamation, or a map of their final boundaries.

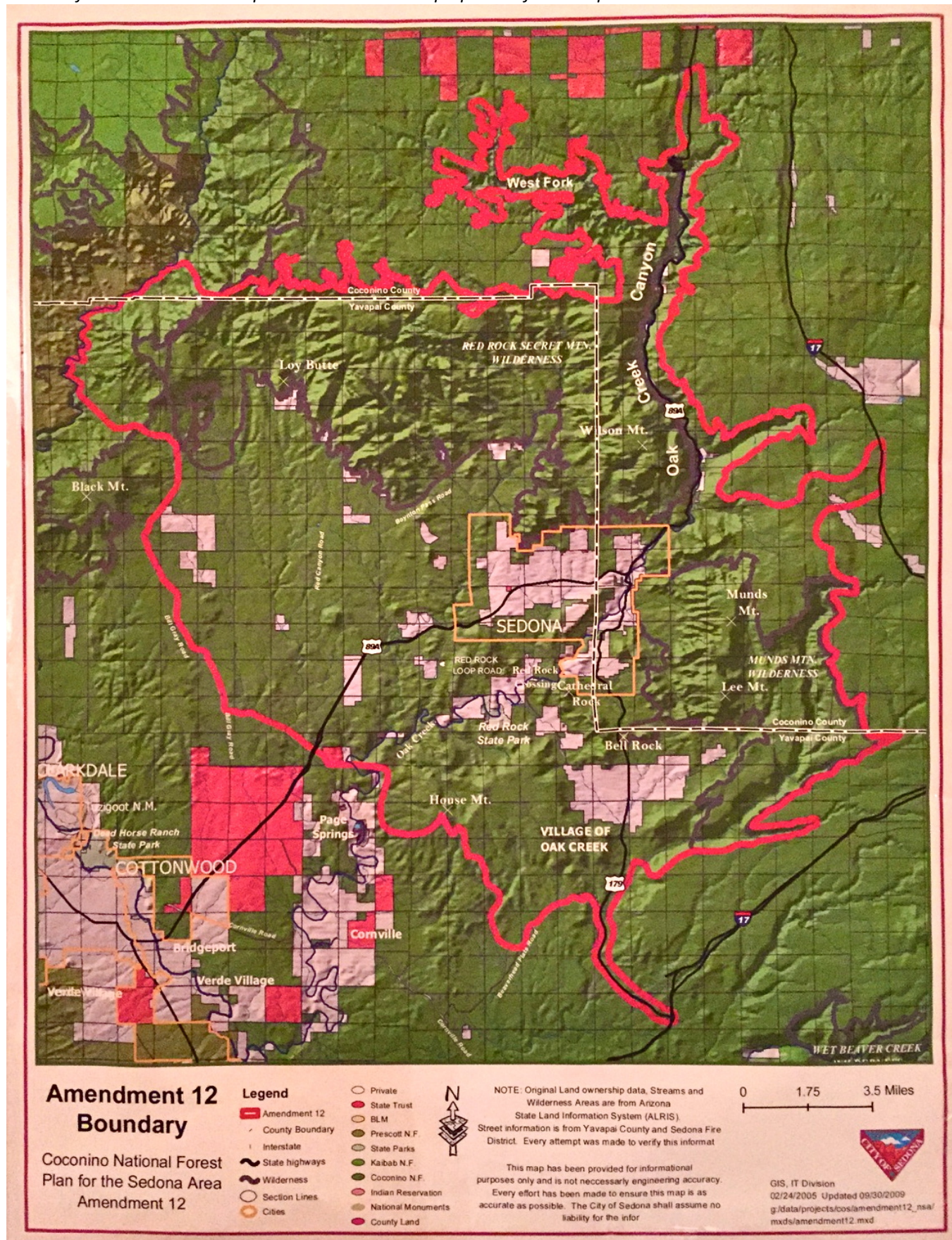
National Monument Signs would be at all the major highway entrances to Sedona from Highways 179 and 89A from the south and on 89A at head of Oak Creek Canyon.

Justification. In community presentations in July and August, KSB has stated that the current management, protections and budget for the Red Rock Ranger District are inadequate and that national monument status will provide permanent protection and higher likelihood of obtaining funding and grants. We are told: "nothing will change in management of our area."

See: Amendment 12 Boundary Map in this packet. Forest service planning area boundary is red. This is the proposed Monument boundary (unless KSB expands it to upper Verde River and Beaver Creek east of I-17).

- The southern boundary is adjacent to Page Springs, within a few miles of Cottonwood and Cornville. Parts of 3 wilderness areas are included to the north and the east.
- The bright red lands are state lands: the large block of state land south of the boundary may be annexed into the city of Cottonwood.
- The grey-pink areas are private lands. Note the block of original pioneer homesteads along Oak Creek south-east-north of Sedona.
- The dark purple line defines wilderness areas on north-west-east sides of planning area. Development is not allowed in Wilderness areas.

Proposed national monument boundary is same as the Amendment 12 boundary shown in red.
Wilderness area boundaries are in purple. Several of the private lands in the upper left red cliff area have become forest land since last private land ownership update of this map.



Concerns/Critique-- of some of the proposed national monument management guidelines:

There are many **guidelines, some of which seem to conflict with each other**--this may tie the hands of the land manager, lead to years of dissention and even lawsuit, and dramatically change allowed uses and access to the land.

- management of antiquities is “overriding focus”
 - How this is interpreted in management plan may create **problems in the future**—e.g., is a pottery scatter a reason not to allow a trail or access? Thousands more ancestral outside the proposal boundary all over the Verde Valley.
*A small percent of the public **vandalizes sites in monuments** and other public lands.*
 - Verde Valley Archaeology Center just received grants that will allow **expansion of the site steward program**, monitoring, and public education programs.
*"As far as we can tell this program we've developed would **do much more to protect archaeology sites than re-designation as a monument**. The Board of the VVAC has taken no position on this because no one has explained how designation as a monument would do anything more to protect the archaeology sites. As far as we can tell this program we've developed would do much more to protect archaeology sites than re-designation as a monument. The Board of the VVAC has taken no position on this because no one has explained how designation as a monument would do anything more to protect the archaeology sites." Ken Zoll, Executive Director*
- continue to be managed by the Forest Service who will incorporate existing management plan into new one “where compatible with Monument proclamation and guidelines “
 - It is at least a 3 year process to create a new management plan: **why devote staff time and budget to a new management plan** when the Red Rock Ranger District is effectively continuing implementation of the existing detailed plan **and** a viable alternative exists to deepen protections within the existing plan?
 - VVAC just received grants that will allow expansion of the site steward program and monitoring and signs—this will expand after this first year
 - *"As far as we can tell this program we've developed would do much more to protect archaeology sites than re-designation as a monument. The Board of the VVAC has taken no position on this because no one has explained how designation as a monument would do anything more to protect the archaeology sites." Ken Zoll, Executive Director*
- Recreational uses and commercial tour activities to continue subject to new guidelines. A new process to be created to “evaluate recreational activities, their safety, impacts and compatibility with Monument values.”

*Even though KSB has repeatedly stated “nothing will change with uses within the monument, this guideline **sets the stage to totally re-evaluate and change** public access to the forest, allowed uses, and commercial use.*
- closes the area to land disposal “through public land laws”
 - This was KSB’s main concern in the 2010-2013 national scenic area proposal and I perceive, is the reason for inclusion of thousands of acres of private land in the monument boundaries. The Sedona area has been removed from the base for **land exchange**. Retention of these nationally and internally recognized high value public lands is the goal of the Coconino Forest Plan. There have been NO exchanges since Amendment 12.
 - **To amend this restriction on land exchange requires extensive analysis and public review.**
 - Only a few hundred acres in the Dells area south of Sedona by the sewer system can be used to exchange for a high value site *within* this planning area. But 6 of the 8 high value properties the forest service identified as lands they would exchange with willing sellers have been purchased from 1999-2004 by the federal land conservation fund.

- **Other very limited authority the forest service has to dispose of federal lands are:**
 - **for public sites needed by municipalities under the Townsite Act** (this is how Sedona obtained waste treatment lands and the high school site)
 - use **Small Tracts Act to make minor adjustments** such as and unneeded rights-of-ways. The Forest Plans calls for the for: Village of Oak Creek golf course, Chapel, small acreage within Slide Rock State Park—these small parcels will only will be sold to these specific entities—not for development.
 - Very **limited authority to sell an administrative site** such as the 11-acre sale of the Brewer Road Ranger Station, which provided funds for building a modern visitor center and ranger station as a gateway facility on Hwy. 179.

This arbitrary guideline will preclude the Forest Service from providing needed community sites in the future such as for a school and from making small adjustments.

- mineral entry withdrawn; no oil and gas leases
 - ***Geology of the area makes mineral or oil and gas development a **non-issue**.***
- no commercial energy development
 - What if in the future a site is needed for alternative energy that could be placed in a visually unobtrusive location? **The community may need this!**
- “laws, regulations, and policies followed by the agency in issuing and administering grazing permits or leases to continue”; next guideline, however, says “no new land-use leases shall be granted within the Monument”
 - ***Evidence from other western monuments, such as Escalante, show that the **stricter and stricter guidelines make it economically unfeasible for ranching to continue**. All 7 ranchers in this monument went out of business.***
- mandates an invasive species inventory
 - ***Much of this work has been done, why mandate an agency staff/budget item? Given the funding shortfalls, why tie the hands of the land manager with **overly explicit work items** such as this?***

Other Concerns & Unknowns with the Proposed National Monument

National Monuments. National monuments under the Antiquities Act are created to protect specific historic or prehistoric sites. Important geologic features are now also covered under the Antiquities Act. About 30% of national monuments have been converted to national parks.

In our research, we have found *no other national monument that includes cities, towns and large tracts of private land within its boundaries. Parks & monuments are a form of tourism development that could bring an even higher level of visitation to already saturated roads.*

Diverse qualities within planning unit. The forest service Amendment 12 plan divides this into different planning areas such as: Neighborwoods surrounding communities; Savannah for open lands out by Bill Grey and FR 525; Red Cliff, Red Cliff Front Country and Schnebly Rim for the most

scenic high public use areas: Dry Creek Basin: Gateway; Oak Creek Canyon.

The proposal lacks analysis to support why all of these diverse areas should be within a national monument.

Public Process. KSB has no authority to run a public process on management of federal lands. KSB is presenting their preferred solution without discussion of effects of this action and delivering it directly to the President hoping it will get included in end-of-term new monuments. There is no willingness on the part of KSB to explore alternative boundaries or other ways to create needed “protections”.

The public does not have a clear idea of the process KSB will use to achieve their goal. We are told they will go first to Departments of Agriculture and Interior--it appears one or both of these departments must

support KSB's proposal before it goes to President. *Who specifically will it be submitted to? How can the affected public and communities have a chance to send their comments to these same agency decision-makers?*

Professional Process Needed. The Forest Service has not done a detailed scenic analysis for the Amendment 12 area. Analysis of all the factors would guide designation of scenic unit boundaries and additional protections. *Public involvement would be a key part of refining and shaping the boundaries and guidelines.*

Lack of Information. The public does not have adequate information about what changes in management of multiple use lands to national monument status means and how it will affect the area. The time frame is too short for real analysis. The forest land manager is not involved in this private process. *What are the impacts and unintended consequences?*

KSB is presenting an idealized vision of the positive benefits of their proposal—but not presenting a full picture of the actual management of this area.

Geology of the area makes mineral or oil and gas development a non-issue. There are thousands more ancestral sites outside the proposal boundary. Sedona area has been removed from the base for land exchange. Retention of these valuable public lands is the goal—to amend that requires extensive analysis and public review.

Rural and Outdoor Lifestyle Impacts. There is a long history in the area of homes with livestock; farms, ranches, grazing, hiking-exploring, art & photography on the land, open camping. Forest service land is literally near the back door of thousands of homes. Evidence suggests that access becomes more restricted under monument status and that locals have to go farther to access public lands. Many locals fear that cross-country foot travel may be prohibited.

Evidence shows a rise in property values, which make the area less affordable for residents to continue to live here. Monuments more easily attract funds to buy out inholdings and over time could change the area to a tourist park feeling with less sense of local community.

From Vision and Guiding Principles, USFS, Red Rock Ranger District, Amendment 12 Plan, 1998

I believe this vision statement. Hundreds of us local citizens participated in this planning process. We were heard...the incredible values of this area were recognized. The implementation still goes on today in a collaboration of Forest Service professionals and active partnerships with citizens and other agencies.

A Shared Vision for the Redrock Country

"We recognize the national and international importance of the Sedona/Oak Creek ecosystem.

We will not regard the area as a potential theme park for commercial exploitation at the expense of nature.

We will not sell the day to profit the hour. *Our actions will reflect a variety of interests and will be based on honest dialogue and responsible, creative partnerships with the community and with local and state governments. Together with the Forest Service, these partners will endorse and take actions to improve the stewardship of the land. We will honor the need to act collaboratively in order to preserve the area's values for future generations."*

Alternative to Monument Proposal:

Goals of this alternative:

- ❖ Keep the current management status of the Sedona-Oak Creek Planning Area as is unless site-specific analysis along with a public process is done for specific high-value sites/areas.
- ❖ Focus increased management attention to the famous red cliff areas that attract high visitor use, but do not turn the whole area into a "Park-like atmosphere" that will attract an even higher level of use.
- ❖ Balance the visitor management with keeping a community feeling for the Neighborwoods; keeping the Savannah area as dispersed, multiple use area without visitor facilities.
- ❖ **Red Rock Scenic Area signs** would be limited to actual management area: would not be seen from Highway 179 until north of the Village of Oak Creek --would be at top/north end of Oak Creek Canyon on 89 --on Dry Creek Road and NOT be placed on 89A south of Sedona.

See: Alternative Map on next page.

Additional management prescriptions can be developed by the forest service through a public process.

I created this map to **depict the key red cliff scenic management units—red on map--** from Amendment 12 map

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- **Red + high use parts of the Pink could be formed into a special Red Cliff Scenic management unit** as part of the on-going implementation of Amendment 12 by Coconino National Forest.
The red areas PLUS trail accessible edges of the Wilderness areas—***pink on map*** (e.g., Boynton Canyon, Long Canyon, West Fork Trail, Bell Rock, other trails accessible from highways) are the high public use areas that attract the majority of the visitor use.
- ***Neighborwoods—left white on map--are the forest lands surrounding the communities of Sedona, Village of Oak and Red Rock Loop area.***
- ***Savanna area—yellow on map—is a rolling hills, plains, grass, shrub and juniper zone with no developed facilities, trailheads.***

Management Units guidelines.

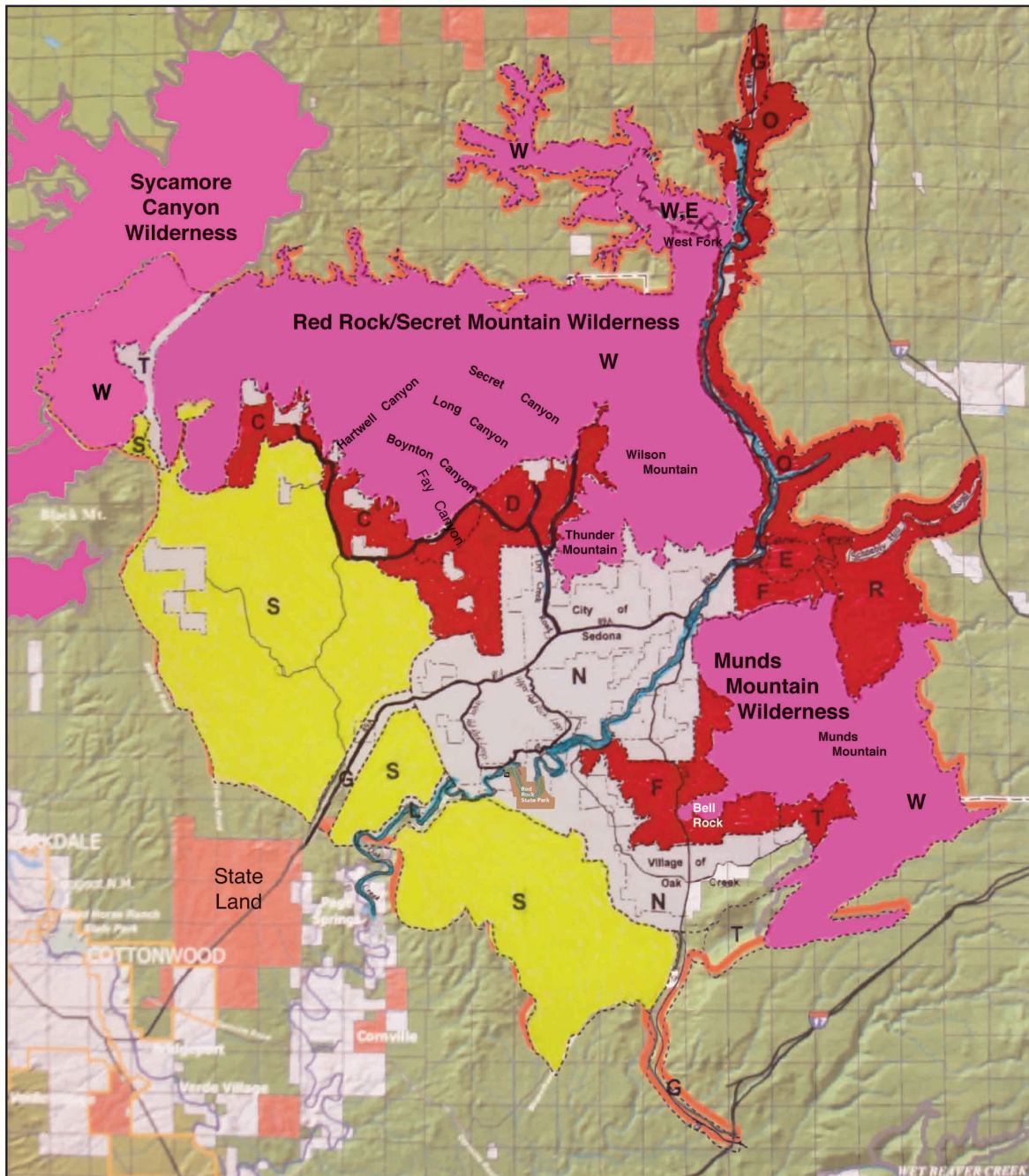
- ❖ **Red Cliff Scenic Management Area** (20,248 acres) —do detailed analysis to update management guidelines, protections, actions and boundary needed for this key scenic and high public use area. This Red Cliff Scenic management unit could also be evaluated for possible nomination as a National Scenic Area in the future *if there is justification of need and public support for this.*
- ❖ **Wilderness Areas** (approximately 80,000 acres)—evaluate high use areas to see if additional management prescriptions are needed and if portions of it should be included in the Scenic Area Management Unit.
- ❖ **Neighborwoods** (15,151 acres) continue to manage for community interface, protection of Oak Creek as per the plan: **Strong community partnerships for stewardship of Sedona’s backyard; support resident health, safety and quality of life. Relatively quiet, easily accessed forest lands that supports wildlife, scenic viewing and experiencing nature.**
- ❖ **Lower Oak Creek** (754 acres): As per plan: non-motorized, uncrowded, disperse, opportunity for solitude.
- ❖ **Savanna** (39,203 acres) keep this grasslands, hills area dispersed use area, maintain the rural character, allow grazing. No developed trails, trailheads or campgrounds here to attract visitors. Keep the motorized corridor use. 1998 plan guidelines: improve and expand wildlife forage (birds, antelope); decrease shrub overgrowth of recent decades with firewood cutting, low intensity fire; opportunity for natural uncrowded environment, to experience quiet and solitude, wildlife viewing

Archaeology Site Protections:

- ❖ Support expansion of the Verde Valley Archeology Center **Site Steward, Education and Site Monitoring** Program.
- ❖ **Designate special heritage sites** to be managed by a fenced area with entry gate and site steward, such as the Verde Valley Archaeology Center, and only be open certain hours (such as has been done at Palatki and Honanki, which attracted a very large grant for site protection and trail improvements).
- ❖ Could request the National Park Service to consider adding V-V or Sacred Mountain to **Montezuma Castle National Monument if evaluation analysis proves it warranted.**

Red + high use parts of the Pink could be formed into a special Red Cliff Scenic management unit as on-going implementation of Amendment 12 by Coconino National Forest. (Some upper left white lands now public.

Alternative Plan: Red Rock Scenic Management Unit



Amendment 12 Management Area Key:

W Wilderness
 O Oak Creek Canyon
 E Special Areas
 D Dry Creek Basin
 G Gateway
 L Lower Oak Creek
 N Neighborhoods
 C Red Cliff
 F Redrock Frontcountry
 S Savannah
 R Schnebly Rim
 T Transition

- Wilderness Areas** — portions with high pubic use should be evaluated for inclusion in scenic area unit.
- High Scenic and Public Use Areas** — main red cliff visitor attraction units
- Savanna** — open hills with junipers: dispersed use, less visitors, no trail heads/campground; grazing and motorized use allowed
- Forest "Neighborhoods" and Private lands** are white areas

Alternative map prepared by Sandra Cosentino; Graphics by Linda Rettinger Sept 3, 2015

Coalition of citizen supporters to help with key needs:

A coalition of citizen supporters (Red Rock Stewards Council) could meet with the Red Rock Ranger District and explore ways to increase staff and maintenance funds such as:

- Build local support for raising Red Rock pass daily/weekly fees to help pay for visitor services maintenance and patrols. In 2014, \$780,000 in revenue was generated from this.
- Explore ways for citizen council to *lobby for increased funding for the Red Rock Ranger District in the forest budget*, particularly for trail, patrols and archaeological staff; road maintenance and trash pick up.
- Create a volunteer and student intern *ambassador program* such as the Oak Creek Watershed Council does.
- Support expansion of the Verde Valley Archeology Center Site Steward and Site Monitoring Program.
- Work with the *National Geographic Sustainable group* to obtain funding to address increased use that will come from this program such as increase Sedona Red Rock Trail Fund.
- Work with the *City of Sedona* to increase their annual trail maintenance contribution to the Red Rock Ranger District.
- Write grants such as for specific projects needed by the Ranger District.

Some of the additional protections/use management tools forest service can use:

- create a *reservation system* to limit use and to charge user fees
- gate trailheads and *limit hours of use*
- request BLM to *close high public use recreation areas to mineral entry*
- limit commercial permitted use
- close areas to motorized use (60 miles of dirt roads were closed in the ranger district 2 years ago)

Forest Service Management of Recreational Use in Sedona Area

Red Rock Ranger District has been implementing recreation and land protections since Amendment 12 was approved in 1998 following extensive public involvement--a process that continues today—some examples:

- By forest order, camping and campfires restricted around Sedona and VOC (closed road accessible areas on Schnebly Hill, near the communities and along Boynton Pass Road; only Savanna unit allows roadside camping).
- Oak Creek Canyon Recreation Area was closed to mineral entry; parking limited to managed rec sites.
- The Forest Service has removed Sedona area lands from the base for exchange (only the Dells area south of Sedona by the sewer system can be used to exchange for a high value site *within* this planning area).
- The Forest Service has obtained most of the high value properties identified in the plan from willing sellers. These are automatically closed to mineral entry and cannot be exchanged.
- Sale of the old Ranger Station property on Brewer Road paid for the new modern Visitor Center and ranger station on Hwy 179. This beautiful, national park quality center is a gateway that provides visitor information, maps, Red Rock Pass fee collection, and natural history presentations.
- Implemented a several year process to manage outfitter-guide permits. The Forest Service now has authority to limit commercial use by permit (which has become a national standard). Now no new permits will be allowed unless they meet a specific need designated by the Forest Service. For example, mountain bike guide permits were issued based on a prospectus process.
- Closed 60 miles of roads to motorized use and prohibited off-road vehicle travel under the travel management regulations.
- Developed trailhead vistas, parking and signage and information.
- Greatly reduced forest access using engineering such as boulders to block roadside parking and off road access, curbs

along Highway 179 that have blocked all the old points where people could pull off and park to access the forest.

- Re-engineered the trail system and created a larger and more hardened trail system working with volunteer groups. Worked to clean up and stop unauthorized trail building.
- Created several paved parking areas for forest access. When these are full, as they often are, that limits visitor use in the popular areas.
- Created Red Rock Pass program to obtain funds for managing high use impacts, for

education, signs and trailhead toilets, Red Rock Recreation Guide and patrolling.

- Balancing of recreational uses on the forest recognizes the strong demand for inspirational and contemplative benefits in the natural landscape and provide settings that contribute to these benefits.
- No glass in Oak Creek Canyon forest order to protect the stream corridor and wildlife.
- Non-commercial permits are issued for the 4WD Casner Mountain corridor.
- Limited helicopter activities associated with filming around most of Sedona

Partnerships with Private and Public Groups

"We continue to work to balance scenery values with needed recreation and community needs and facilities.

We have worked with the Chamber of Commerce and Arizona State Parks (and others) through partnerships and grants to improve education and interpretation through new kiosks, interactive displays at the visitor information office, having the ranger station constructed on 179 to reach visitors as they enter the community."
(Judy Adams, Lands Team Leader Coconino National Forest)

The Red Rock Ranger district has extensive partnerships with:

- *Oak Creek Watershed Council* who gets grants from Arizona Dept. of Environmental Conservation for watershed protection, work and public information
- *Friends of the Forest* who help build and maintain trails
- *Verde Valley Archaeology Society* who is expanding their site protection and educational outreach program with grants and cooperative work with other agencies
- *Keep Sedona Beautiful* who provides volunteers, expertise and funding such as in support for obtaining high value private properties, does roadside clean up, and much more.
- and many, many more groups