To: micah_chambers@ios.doi.gov[micah_chambers@ios.doi.gov]; amanda_kaster@ios.doi.gov[amanda_kaster@ios.doi.gov]; Deeley, Blake (blake_deeley@ios.doi.gov)[blake_deeley@ios.doi.gov]; (b) (6) [redacted] @ios.doi.gov[(b) (6) [redacted] @ios.doi.gov]; Todd_Willens@ios.doi.gov[Todd_Willens@ios.doi.gov]; katharine_macgregor@ios.doi.gov[katharine_macgregor@ios.doi.gov]; kathleen_benedetto@ios.doi.gov[kathleen_benedetto@ios.doi.gov]
From: Small, Jeff
Sent: 2017-08-04T12:02:11-04:00
Importance: Normal
Subject: FW: Asarco Comment letter on Ironwood National Monument
Received: 2017-08-04T12:06:13-04:00
Asarco_comment_letter_DOI-2017-0002.pdf
LEACH 2017 Regular LH.PDF
asar.jpg
image002.jpg
image003.png
image004.png
image005.png
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image007.png
image001.png
image008.png
image009.png

Wanted to pass along the below emails and attached docs from Asarco regarding the Ironwood National Monument.

Chairman Gosar and 16 members of the Western Caucus recommended a recession of this monument and others in a letter to the Secretary HERE.

Let me know if you all have any questions or if you would like more info.

Have a good weekend.

Sincerely,

Jeff Small
Executive Director | Congressional Western Caucus
Senior Advisor | Congressman Paul A. Gosar, D.D.S.
2057 Rayburn HOB | Washington, DC 20515
(202) 225 2315 main
jeff.small@mail.house.gov

From: Genevra Richardson [mailto:genevra@govgroupaz.com]
Sent: Thursday, August 03, 2017 2:09 PM
To: Pew, Penny
Cc: Jeremy Browning; Van Flein, Tom; Pearson, Trevor; Small, Jeff
Subject: Re: Asarco Comment letter for Ironwood National Monument

Thanks Penny,

Our folks have also been in contact with David Bernhardt's office as well, since he was just sworn in a couple of days ago, to flag this issue. They have assured us that Asarco's request will be looked at carefully. Any support your office or the Western Caucus can provide in this regard would be much appreciated. I've also attached an aerial picture that further demonstrates the geography of the monument.

Let me know if you have any additional questions.

Thanks
Genevra Richardson
480-703-9112

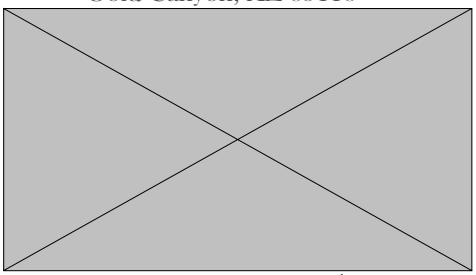
From: Pew, Penny
Sent: Tuesday, August 01, 2017 5:58 PM
To: Genevra Richardson
Cc: Jeremy Browning; Van Flein, Tom; Pearson, Trevor; Small, Jeff
Subject: RE: Asarco Comment letter for Ironwood National Monument

Thanks Genevra!

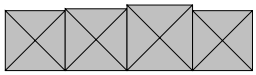
I have copied our Legislative Director Trevor Pearson, the Executive Director of the Western Caucus Jeff Small and our Chief of Staff Tom Van Flein who will be the best point of contact for this monument issue.

Thanks for reaching out to Congressman Gosar's office.

Penny L. Pew
District Director & Intergovernmental Affairs
(928) 308-2033 cell
6499 S. Kings Ranch Road, #4,
Gold Canyon, AZ 85118



Arizona 's 4th District



From: Genevra Richardson [mailto:genevra@govgroupaz.com]
Sent: Tuesday, August 01, 2017 2:29 PM

To: Pew, Penny
Cc: Jeremy Browning
Subject: Asarco Comment letter for Ironwood National Monument
Importance: High

Hi Penny,

Thanks for taking the time to talk with me on the Ironwood National Monument issue. I've attached the comment letter from Asarco – page 10 highlights the issues with the mining claims that were established prior to the monument being declared. Tab 1 and 2 highlights the map with our request for the boundary. I've also attached the letter from Representatives Leach and Finchem and Senator Smith expressing concerns over the boundary. We've also had letters submitted from Southern Arizona Business Coaition.

I really appreciate you calling this to the attention of the Western Caucus and other folks in DC to get DOI's attention.

Thanks
Genevra

Genevra Richardson
President | GovGroup
1437 N. 1st Street, Ste. 102
Phoenix, AZ 85004
480-703-9112

Twitter | Facebook
Lobbying | Government Relations | Advocacy

ASARCO
GRUPO MEXICO

June 30, 2017

Via online submission through www.regulations.gov

Monument Review
MS-1530
U.S. Department of the Interior
1849 C Street N.W.
Washington, D.C. 20240

Attn: DOI-2017-0002

Re: Review of Certain National Monuments Established Since 1996; Notice of Opportunity for Public Comment

Dear Sir or Madam:

On behalf of Silver Bell Mining, L.L.C. and Asarco LLC (collectively referred to as "Silver Bell"), please consider the following comments regarding the notice entitled *Review of Certain National Monuments Established Since 1996; Notice of Opportunity for Public Comment*, 82 Fed. Reg. 22016 (May 11, 2017) (hereafter the "Notice") which is directly related to President Trump's Executive Order 13792 of April 26, 2017, 82 Fed. Reg. 20429 (May 1, 2017) (hereafter "EO 13792").

In particular, these comments will focus on the Ironwood Forest National Monument (the "IFNM") established by President William J. Clinton via Proclamation 7320 issued on June 9, 2000, pursuant to the Antiquities Act of 1906 (the "Act") the boundary of which is depicted on the map attached at **Tab 1**. In the waning days of the Clinton administration (2000-2001), five new national monuments were designated in Arizona, encompassing approximately two million acres.[1] The IFNM includes 189,600 acres of federal, state and private land within portions of Pima and Pinal County, Arizona. Of all the designated monuments in Arizona, the IFNM contains the highest percentage of state and private land (33%) within a monument boundary.

Silver Bell owns 880 acres of fee land and 4,050 acres of unpatented claims within the IFNM but is unable to make economic use of these assets as a direct result of the designation. In addition to the assets trapped within the IFNM, the Silver Bell Mine abuts the southwestern

[1] These include the Agua Fria; Grand Canyon Parashant; Ironwood Forest; Sonoran Desert and Vermillion Cliffs National Monuments. These monuments comprise a land mass comparable to the size of the combined states of Delaware and Rhode Island in a western state with over 80% of its land being public land (federal, state and tribal).

5285 E Williams Circle ♦ Suite 2000 ♦ Tucson ♦ Arizona 85711 Telephone: 520.798.7500

boundary of the monument. The Silver Bell mine has produced copper and other minerals for over 65 years and is located in one of five historic mining districts within and near the IFNM.[2] However, the ability to expand the mine and increase mineral production has been hamstrung by the IFNM designation. Silver Bell has been prevented from conducting exploration activities to determine the full extent of the mineral deposits within its unpatented mining claims, in accordance with the 1872 Mining Law.

Silver Bell requests that the boundary of the IFNM be appropriately modified for the reasons discussed herein. The reasons are specifically responsive to the five factors the Secretary of Interior will consider in reviewing monuments designated or expanded under the Act since 1996 (the "Secretarial Review Period") pursuant to EO 13792. The figure attached at **Tab 2** shows the specific area of 11,056 acres that Silver Bell requests be removed from the IFNM.

I. The Act's requirements and original objectives, including the Act's requirement that reservation of land not exceed "the smallest area compatible with the proper care and management of the objects to be protected".

Congress delegated the President authority to designate national monuments by means of the Antiquities Act of 1906. This law, in relevant part, provides:

> The President of the United States is authorized, in his discretion, to declare by public proclamation *historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest that* are situated upon the lands owned or controlled by the Government of the United States to be national monuments, and may reserve as a part thereof parcels of land, *the limits of which in all cases shall be confined to the smallest area compatible with the proper care and management of the objects to be protected*. [16 U.S.C. § 431 (emphasis added).]

By design, President Clinton's IFNM designation was overly expansive because the identified objects of interest were of a landscape nature. They include drought-adapted vegetation, rugged mountain ranges, views of the Sonoran Desert, ironwood trees, and habitat for threatened and endangered species. This approach (i.e., landscape based designations) was utilized commonly for monument designations made during the Secretarial Review Period.

It is important to understand the genesis of IFNM designation to see the incongruity with the Act. On March 21, 2000 the Pima County Board of Supervisors adopted a resolution to pursue a land preserve to implement provisions of Pima County's Sonoran Desert Conservation

[2] *Ironwood Forest National Monument, Proposed Resource Management Plan and Final Environmental Impact Statement* (Sept., 2011) at Map. 3 8 attached as **Tab 1**.

Plan ("SDCP") which is a regional multi-species habitat conservation plan.[3] The resolution was actually witnessed by then Interior Secretary Babbitt (also a former Arizona governor and state attorney general) who was visiting Pima County to discuss federal coordination efforts associated with Pima County's SDCP. After a well-publicized hike into the area, Secretary Babbitt vowed to secure the permanent protection of certain federal lands identified in the SDCP.[4] Less than *three (3) months later* (emphasis added) the expansive IFNM was designated.

The boundary of the IFNM was remarkably similar to the Pima County "preserve proposal" with the inclusion of additional BLM land to the northwest and adjacent private and state land in between. There was no consideration given to whether the area identified was the "*smallest area compatible* with the proper care and management of *the objects to be protected*" (emphasis added) as there was no time for such analysis to take place even though Silver Bell specifically requested that the boundary be modified.

In fact, in May 2000, Silver Bell's then general counsel met with the Department of Interior Solicitor and staff to express concerns about the monument and discuss a buffer for the Silver Bell mine. Similar meetings were held with the local Bureau of Land Management ("BLM") that same month. On June 5, 2000, senior representatives of Silver Bell's management met with Secretary Babbitt to suggest the creation of a mineral exploration district within the proposed IFNM. Secretary Babbitt indicated he would consider the proposal. Four days later, on June 9, 2000, the monument proclamation was issued and all lands within the IFNM were withdrawn from mineral entry.

Neither the Pima County SDCP "preserve proposal" nor the resulting IFNM designation represent the smallest area compatible with the proper care and management of the objects to be protected. At the outset, there had to be a proper identification of discrete objects of interest as opposed to identification of a landscape. The failure to undertake that identification in a manner that is in keeping with the spirit and intent of the Act led to the expansive designation. The objects protected in the case of the IFNM are not valid objects of scientific or historic interest. Thus, the area designated to protect those unjustified objects is equally invalid.

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[3] Pima County Resolution 2000 63 (Supporting the Establishment of a Silverbell and Ragged Top Preserve on BLM Lands) attached as **Tab 3**.

[4] *See* attached news articles at **Tab 4**.

II. Whether designated lands are appropriately classified under the Act as "historic landmarks, historic and prehistoric structures, [or] other objects of historic or scientific interest".

The legislative history of the Act reveals an intent to protect ancient and prehistoric American Indian archeological sites on federal lands from looting.[5] In fact, the Act's primary purpose is to "preserve the works of man."[6] Unfortunately, regulatory definitions of other terms contained within the Act (consistent with its intended purpose) including "historic landmarks," "historic and prehistoric structures," or "objects of historic and scientific interest" do not exist. Accordingly, the plain meaning of these words must be given due weight. Only the term "historic landmark" connotes something broader than a human artifact (object or structure). Even so, the word "landmark" means "an object (such as a stone or tree) that marks the boundary of land," "a conspicuous object on land that marks a locality," "an anatomical structure used as a point of orientation in locating other structures," "an event or development that marks a turning point or a stage," or "a structure (such as a building) of unusual historical and usually aesthetic interest; especially one that is officially designated and set aside for preservation."[7]

The chart below includes passages from the IFNM proclamation and an assessment of whether the identified characteristic is a "historic landmark, historic or prehistoric structure, or other object of historic or scientific interest."

IFNM Proclamation Passage	Historic landmark, historic or prehistoric structure, or other object of historic or scientific interest?	Comments
The landscape of the [IFNM] is swathed with the rich, drought adapted vegetation of the Sonoran Desert.	No.	Drought adapted vegetation is everywhere in the Sonoran Desert.

[5] Ronald F. Lee, "The Antiquities Act, 1900 1906," in *The Story of the Antiquities Act* (National Park Service, Mar. 15, 2016), https://www.nps.gov/archeology/pubs/lee/Lee_CH6.htm (last visited June 28, 2017).

[6] 54 U.S.C. §§ 320301 03.

[7] *Merriam Webster*, merriam webster.com, https://www.merriam webster.com/dictionary/landmark (last visited June 23, 2017).

IFNM Proclamation Passage	Historic landmark, historic or prehistoric structure, or other object of historic or scientific interest?	Comments
The Monument contains objects of scientific interest throughout its desert environment. Stands of ironwood, palo verde, and saguaro blanket the monument floor beneath the rugged mountain ranges, including the Silver Bell Mountains.	No.	Stands of trees and cactus beneath mountains do not constitute a landmark or object of antiquity.
Ragged Top Mountain is a biological and geological crown jewel amid the depositional plains in the Monument.	Possibly.	A mountain with interesting geologic features may constitute an object of scientific interest, but the protection of the object should be confined to the mountain pursuant to the provisions of the Act.
The Monument presents a quintessential view of the Sonoran Desert with ancient legume and cactus forests. The geologic and topographic variability of the Monument contributes to the area's high biological diversity.	No.	"Quintessential views" and geologic and topographic diversity do not meet the standard.

IFNM Proclamation Passage	Historic landmark, historic or prehistoric structure, or other object of historic or scientific interest?	Comments
The Silver Bell Mountains support the highest density of ironwood trees recorded in the Sonoran Desert.	No.	There are four classes of protected native plants in Arizona. In order of importance and protection they are: (i) highly safeguarded, (ii) salvage restricted, (iii) salvage assessed and (iv) harvest restricted. A.A.C. R3 3 1101 *et seq*. Ironwood trees are within the latter two categories meaning a permit for salvage is required and the plants have enough value if salvaged to support the cost of so doing and may be subject to over harvest. No other protective classification of any type or kind is relevant. Further, this assertion was never true. Even Pima County's published Ironwood Primer documents higher density in Organ Pipe National Monument. [8] Subsequent ironwood surveys conducted in the area of I 10 and Tangerine Road in Tucson evidence densities 5 times greater than in the IFNM.

[8] *Desert Ironwood Primer: Biodiversity and Uses Associated with Ancient Legume and Cactus Forests in the Sonoran Desert*, Arizona Sonora Desert Museum (Feb., 2000).

IFNM Proclamation Passage	Historic landmark, historic or prehistoric structure, or other object of historic or scientific interest?	Comments
The Monument is home to species federally listed as threatened or endangered, including the Nichol's Turk's head cactus and the lesser long nosed bat, and contains historic and potential habitat for the cactus ferruginous pygmy owl. The desert bighorn sheep in the Monument may be the last viable population indigenous to the Tucson basin.	No.	*Nichol's Turk's Head Cactus ("NTHC")*: listed as endangered in 1979, recovery plan in 1986. In 1988 BLM established the Waterman Mountains Area of Critical Environmental Concern (ACEC) solely to protect the cactus.[9] *Lesser long nosed bat ("LLB")*: recently proposed for delisting, 82 Fed. Reg. 1665, 1676 (Jan. 6, 2017). *Cactus ferruginous pygmy owl ("CFPO")*: Arizona distinct population segment listed in 1997, critical habitat designated in 1999; removed from list of endangered and threatened wildlife and critical habitat withdrawn in 2006 (71 Fed. Reg. 19452 (Apr. 14, 2006)). Subsequent petition to relist in 2011 determined not warranted (76 Fed. Reg. 61856, (Oct. 5, 2011)). *Desert bighorn sheep*: a non federally listed big game species in Arizona known to inhabit the Silver Bell Mountains and surrounding area.
Abundant rock art sites. Two areas on National Register of Historic Places, the Los Robles Archeological District and the Cocoraque Butte Archeological District.	Possibly.	Certain of the National Register sites warrant remaining protection but they are discrete areas within the IFNM and the boundaries of the sites should be the extent of the area protected. Individual rock art sites or discrete artifacts may not warrant protection. Additional information on cultural resources is provided in the IFRMP FEIS.[10]

[9] In 1996, Public Land Order 7197 (61 Fed. Reg. 26528) withdrew all Federal Lands in the ACEC from settlement, sale, location or entry for 50 years effective May 28, 1996.

[10] *Ironwood Forest National Monument, Proposed Resource Management Plan and Final Environmental Impact Statement* (Sept., 2011) at pgs. 3 31 thru 3 38 attached as **Tab 5**.

In April 2000, just before the IFNM proclamation, the BLM Tucson Field Office conducted a review of the "Areas of Scientific and Historic Interests" in conjunction with the consideration of the proposed IFNM.[11] Importantly, the review included 150,114 acres which was a prior established BLM special management area known as the Silver Bell Resource Conservation Area (the "Silver Bell RCA"). When designated, the IFNM included 189,600 acres in total, as an additional 39,486 were added to include the Sawtooth Mountains. There is no apparent evidence that the Sawtooth Mountain area was evaluated by BLM prior to the designation and it is unknown as to how or why it was also included.

BLM's analysis did not justify the IFNM designation. BLM's report did not even mention "spectacular views" or "ironwood" or "ancient legume and cactus forests" as plants of concern requiring special management. In fact, the BLM's report supported the establishment of a special management area to protect historic mining activity (such as the Silver Bell Mining District) and management prescriptions to ensure mining could continue, which is exactly what Silver Bell asked Secretary Babbitt to consider prior to the monument proclamation.[12]

In relevant part, excerpts from BLM's report include the following:

- "Setting: . . . Common plants include; ironwood, palo verde, creosote, brittle-brush, triangle-leaf bursage, ocotillo, and thornbush. . . . The [prior established] resource conservation area encompasses most of the mountain ranges that are important to the diverse wildlife and plant communities associated with the saguaro/ironwood forest. . . . In addition, the resource conservation area contains habitat for several endangered species[13] . . . a site on the National Register of Historic places, an archeological district on the National Register of Historic Places, an ACEC to protect an endangered cactus, a Desert Bighorn Sheep special management area, Desert Tortoise habitat, Historic mining camps and scenic open space."

- "Areas of Prehistoric Interest: Although only a portion of the land administered by the BLM in the proposed Ironwood Preserve area has been inventoried for cultural resources, enough documentation has been accomplished to provide a general idea about what types of cultural properties are located there. . . .

[11] Areas of Scientific and Historic Interest (BLM 2000) attached at **Tab 6**. BLM's report was not openly published but was obtained by Silver Bell pursuant to a Freedom of Information Act request dated March 1, 2001 made by Jerry Haggard of Gust Rosenfeld, P.C. following the IFNM designation.

[12] Other national monuments (including the California Coast and Canyons of the Ancients) recognized non renewable resource utilization and allowed oil and gas leasing and production to continue.

[13] "Several" at the time of designation included three listed species: the CFPO which is no longer listed, the LLB which has been proposed for de listing, and the NTHC which remains listed and is protected via an existing ACEC and withdrawal.

> *Numerous historic sites, mostly associated with silver and copper mining during the late 1800's and early 1900's, are located in the area (*emphasis added*)* . . . ; Cocoraque Butte Archaeological District; [t]hese historic sites represent an important aspect concerning the industrial development of southeast Arizona. . . ."

- "Areas of Historic Interest: *Silver Bell Mining District* (emphasis added*)*; Silver Bell Cemetery, Arizona Southern Railroad."[14]

- "Areas of Geologic Interest: *Silver Bell Mining District (*emphasis added*)*; Ragged Top Peak."

- "Areas of Special Management: [t]he Silver Bell RCA, covering 150,114 acres designated in the Phoenix RMP for the purpose of retaining public lands (surface and subsurface estate) and to consolidate public ownership and intensively manage lands in the RCA. The RCA contains several different Special Management Areas ("SMAs") protecting the unique features of the area. These include the Agua Blanco Ranch Multiple Resource Management Area which covers 16,699 acres . . . [t]he 47,976 acre Cocoraque Butte-Waterman Mountains Multiple Resource Management Area . . . ; the Waterman Mountains Area of Critical Environmental Concern ["ACEC"] established in the Phoenix RMP to protect the habitat for the Nichols Turkshead cactus, containing 1,960 acres of Public land . . . ; [t]he 56,800 acre Silverbell Desert Bighorn Sheep Special Management Area to be managed for improved habitat condition for desert bighorn sheep . . ."[15]

The designated lands of the IFNM were not appropriately classified under the Act and were unsupported by any prior analysis. Expansive BLM special management areas already existed to protect the plant and animal species of concern and there was no justifiable reason to designate 189,600 acres as a national monument in this area. It may be that there are cultural resource areas warranting protection under the Act, but further consideration should be given to reducing the size of IFNM to the areas immediately surrounding valid objects of scientific or historic interest.

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[14] All of these supported historic mining activities and nearly three pages of the BLM's report is dedicated to the rich mining history associated with these areas. *See* **Tab 6** at pgs. 4 6.

[15] See attached map at **Tab 7** depicting these special management areas.

III. The effects of a designation on the available uses of designated Federal lands, including consideration of the multiple-use policy in the Federal Land Policy and Management Act as well as the effects on the available uses of Federal lands beyond the monument boundaries.

A. Silver Bell's Unpatented Mining Claims

As stated above, the Silver Bell Mine abuts the southwestern boundary of the IFNM and is located within a historic mining district. The Silver Bell Mining District, has been a source of copper and other valuable mineral products, such as gold, silver, lead, zinc, molybdenum and manganese, for over a century. Asarco LLC has conducted mining and mineral processing in Arizona since 1911 and at Silver Bell since the 1950s (over 65 years). At present, approximately 60,000 tons of ore and waste rock are mined on a daily basis at Silver Bell. Silver Bell's SX-EW plant produces approximately 65 tons of 99.99 percent pure copper cathode each day, helping to supply the nation's need for copper while employing American workers.

Silver Bell holds possessory title to 196 validly located and maintained unpatented mining claims located within the IFNM. All of these claims were located before the monument was created, including 124 claims that were located between 1950-1970. These claims cover approximately 4,050 acres. Just prior to the monument designation, Silver Bell invested $72 million to build a new 50 ton per day SX/EW facility, which was dedicated in 1997. Mine expansion is precluded on the claims within the IFNM as Silver Bell has not been allowed to conduct exploration activities to determine the full extent of the mineral deposits therein, in accordance with the 1872 Mining Law. The IFNM is nothing but a disincentive for continued investment in this mine and in the state and local economy.

The monument proclamation states that it is subject to prior existing rights, but BLM has not administered the monument accordingly. On July 12, 2000 (just after the IFNM designation) Silver Bell filed with BLM a notice of intent to conduct drilling of four exploration holes and associated road clearing on certain of its claims within the IFNM boundary (total disturbance of only 1.4 acres). In response, BLM determined that a plan of operations was required and stated that off-road vehicle use was prohibited on the mining claims within the IFNM. BLM also advised that the approval of any plan of operations would be subject to a validity examination of the mining claims supported by data obtained prior to the establishment of the IFNM that withdrew the land from mineral entry.

Since 1993, Silver Bell has paid $326,000 in claim maintenance fees to the BLM to maintain title to the unpatented mining claims within the IFNM. Silver Bell spent additional funds to explore and maintain its mining claims prior to creation of the monument. In 2000, the economic loss suffered by Silver Bell due to its inability to develop these claims was estimated at $146 million.

B. Effect on Other Types of Multiple Land Uses

The IFNM proclamation prohibited most types of land use of the Federal lands therein. All federal lands and interests in lands within the boundaries of the monument were withdrawn from all forms of entry, location, selection, sale or leasing or other disposition under the public land laws and mining law. All non-emergency motorized and mechanized vehicle use off road is prohibited. Over 17 miles of prior existing roadways have been closed and miles of other roads are restricted to non-motorized traffic. Grazing was, however, allowed to continue for the term of existing leases.

Following the IFNM monument proclamation, it took BLM 13 years to complete the IFNM Resource Management Plan (the "IFRMP").[16] The management prescriptions in the IFRMP further tightened the grip on prohibited land uses by establishing a panoply of "special management areas" as detailed below:

- No utility corridors can be authorized within the IFNM. The entire IFNM is classified as an "avoidance area" (which includes the development of renewable energy resources) subject to recognition of valid prior existing authorizations.[17]

- The IFRMP established a 29,820 acre Desert Bighorn Sheep Wildlife Habitat Area ("WHA") where closures to human entry can be implemented annually from January 1 through April 30 as needed.[18] Boiled down, that means nearly 1/4 of the IFNM can be closed to human entry for over 1/3 of any given year. Notably, the WHA is immediately adjacent to the entire northern half of the Silver Bell Mine.

- The IFRMP established the Ragged Top Vegetation Habitat Management Area (VHA) where only restricted camping is allowed. Interestingly, no specified vegetation management is prescribed.[19] Additionally, the Ragged Top VHA surrounds the Silver Bell Mine.

- Two-thirds of the entire IFNM is classified as a Class II Visual Resource Management Area (i.e., retain the visual character of the landscape).[20] Management prescriptions include "managing activities that result in fugitive-dust

[16] *Ironwood Forest National Monument, Record of Decision and Approved Resource Management Plan* (Feb., 2013).

[17] *Id.* at pg. 74.

[18] *Id.* at pg. 43 and Map 3.

[19] *Id.* at pg. 45 and Map 4.

[20] *Id.* at pg. 56 and Map 5.

to protect visual quality" and "managing visual resources consistently on lands adjacent to the Monument lands."

- The entire IFNM is designated as a Special Recreation Management Area ("SRMA") to be managed for its undeveloped character. The result is a concentration of recreational uses at specified locations which has the effect of directing motorized traffic to Silver Bell's privately owned property (via Avra Valley Road and Silverbell Road) in order to gain access to the IFNM. BLM's published IFNM maps identify trailheads, interpretive sites and historic sites for which there is no public access making these amenities accessible only via trespass across Silver Bell's private property.[21]

- Finally, 9,510 acres of the IFNM was designated as "lands managed to protect wilderness characteristics." Not surprisingly, the largest of this land classification abuts the Silver Bell Mine encompassing many of Silver Bell's unpatented claims.[22] Management prescriptions within these areas include naturalness, solitude, and primitive and unconfined non-motorized recreation.

The designation of 9,510 acres of "lands managed to protect wilderness characteristics" is perhaps the most troubling aspect of the IFRMP. In March 2007 BLM published the draft environmental impact statement ("EIS") for the IFRMP. In reliance on BLM IM 2003-275, Change 1, (Consideration of Wilderness Characteristics in Land Use Plans) and an Arizona Wilderness Society Proposal, BLM concluded that 36,990 acres within the IFNM possessed wilderness characteristics (Alternative B within the draft and final EIS).[23] BLM did not publish the final EIS until September 29, 2011 and the final record of decision ("ROD") was not issued until February 2013. During the period between the draft EIS and the final EIS (on July 15, 2011), BLM adopted new policies for consideration of lands with wilderness characteristics contained within IM 2011-154 which placed BLM Manuals 6301, 6302 and 6303 in abeyance until further notice.[24] BLM did not conform the final EIS discussion to follow the newly adopted

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[21] *Id.* at pg. 75 and Map 9. The BLM's later approved IFNM Travel Management Plan confirmed and exacerbated this situation. Access to many parts of the IFNM can only be gained via trespass on Silver Bell's private property and there is no approved public access agreement on Silver Bell's land.

[22] *Id.* at Map 6.

[23] *Ironwood Forest National Monument, Draft Resource Management Plan and Environmental Impact Statement* (Mar., 2007) at pg. 3 37 and Map 2 10.

[24] BLM IM 2011 154 (Requirement to Conduct and Maintain Inventory Information For Wilderness Characteristics and to Consider Lands with Wilderness Characteristics In Land Use Plans (July 25, 2011) was issued in direct response to a Secretary of Interior Memorandum to the BLM dated June 1, 2011 issued by Secretary Salazar confirming that BLM would not designate any lands as "Wild Lands" (thus rescinding prior Secretarial Order 3310) and would strictly adhere to the requirements of Section 201 of

requirements of IM 2011-154, which contained detailed and specific factors for consideration and particular planning process steps that must be followed in conjunction with consideration of wilderness characteristics.[25] In particular, those processes require a comparison of wilderness characteristics as discrete units such that differing management prescriptions can be considered and later applied depending on the selected alternative. Accordingly, the 9,510 acres of land BLM ultimately designated in the IFRMP as "lands managed to protect wilderness characteristics" (Alternative C within the draft and final EIS) should not have been so designated. BLM should be required to undertake a plan amendment to conduct a proper wilderness characteristic inventory and analysis regardless of whether the IFNM's boundaries are modified.

IV. The effects of a designation on the use and enjoyment of non-Federal lands within or beyond monument boundaries.

As stated above, Silver Bell's desire to expand its mining operations onto adjacent BLM land has been hamstrung by the IFNM designation. Despite the fact that Silver Bell's unpatented claims are located on land administered by the BLM, they constitute a property right. Unpatented mining claims, located under the Mining Law of 1872, are recognized as estates in real property that cannot be taken without payment of just compensation. "The Supreme Court has established that [an unpatented] mining 'claim' is not a claim in the ordinary sense of the word – a mere assertion of a right – but rather is a property interest, which is itself real property in every sense, and not merely an assertion of a right to property." *Shumway*, 199 F.3d at 1099-1100 (citing and discussing *United States v. N. Amer. Transp. & Trading Co.*, 253 U.S. 330 (1920), *Bradford v. Morrison*, 212 U.S. 389 (1909), and *Benson Mining & Smelting Co. v. Alta Mining & Smelting Co.*, 145 U.S. 428 (1892)).[26] *See also Wilbur v. United States ex rel. Krushnic*, 280 U.S. 306, 316-17 (1930) ("[W]hen the location of a mining claim is perfected under the law, it has the effect of a grant by the United States of the right of present and exclusive possession. The claim is property in the fullest sense of that term."). Since the designation, Silver Bell has not been able to use or enjoy its unpatented claims nor will it in the future with the restrictive management provisions set forth in the IFRMP.

Silver Bell also owns 880 acres of fee land within the IFNM. This fee land includes a substantial segment along both sides of the primary access road to the Silver Bell Mine (called Avra Valley Road). Public trespass from this road to the IFNM (by virtue of inclusion of Silver

---

FLPMA requiring BLM to maintain an inventory of all lands, including those with wilderness characteristics.

[25] *Ironwood Forest National Monument, Proposed Resource Management Plan and Final Environmental Impact Statement* (Sept., 2011) at pg. 3 41.

[26] In *North American*, for example, the Supreme Court held that the federal government could not reserve land for a military base without paying the owner the value of an unpatented mining claim located on the site. 253 U.S. at 337 38.

Bell's land in the monument) is a constant issue and BLM's management has made it worse. Many of BLM's trailheads, interpretive signs and historic site designations can only be accessed via trespass on Silver Bell's property. Moreover, the massive road closures in the IFNM and designation of only a few "Roaded Natural Areas" (where motorized vehicles are allowed) forces motorized traffic to Avra Valley Road and Silverbell Road (both traversing Silver Bell's private property).[27]

There has been no regard for ongoing industrial activity associated with the Silver Bell Mine or the maintenance burdens associated with BLM's management practices. Safety concerns should be paramount as Avra Valley Road is heavily trafficked by mine employees and industrial vehicles (including big rig trucks carrying copper and acid) with much larger profiles than passenger cars. In addition, Silverbell Road (located entirely on Silver Bell's private property) outside of the IFNM is used routinely by the public to access the northwestern side of the monument from Avra Valley Road. Silverbell Road is in very close proximity to active mining operations. These facts have been ignored by the BLM and there is no provision in the IFRMP or the related Travel Management Plan to address the inability of BLM to provide safe, legal access into the core areas of the IFNM.

The designation of the IFNM has had a profound impact on Silver Bell's ability to use and enjoy its private lands and roads and its real property interest in thousands of acres of unpatented mining claims located in the historic Silver Bell Mining District.

V. The concerns of State, tribal and local governments affected by a designation, including economic development and fiscal condition of affected States, tribes, and localities.

Arizona's mines produce approximately 65% of the nation's newly-mined copper, along with significant amounts of associated valuable co-products (e.g., gold, silver, selenium, tellurium and molybdenum). As of 2014, the Arizona copper industry employed approximately 11,500 people and had an estimated direct and indirect impact on the Arizona economy of nearly $5 billion. In recent years, nearly $500 million in state and local taxes have been paid annually by the mining industry in Arizona.

The Silver Bell Mine directly employs 175 people. In 2016, Silver Bell Mining, L.L.C. paid $12,1 million in wages, salaries and benefits, $2.6 million in severance and sales taxes and spent $41.8 million on materials (energy, fuel and supplies) directly benefiting the state and local

[27] *See* **Tab 8** containing Map 7 from the Ironwood Forest National Monument, Record of Decision and Approved Resource Management Plan (Feb., 2013). The dark orange areas are the only "Roaded Natural Areas" where a variety of modes of travel are authorized. There are only five "Roaded Natural Areas" serving as entry into the IFNM. Entry into the IFNM from Avra Valley Road and Silverbell Road (on Silver Bell's private property) are two of the five entrances and the most commonly utilized as they are the most direct route to the "crown jewel" of the IFNM.

economy. When major producers, like Silver Bell, are prohibited from fully utilizing their assets and expanding their operations, there are clear and measurable economic impacts to the fiscal condition of the state and local governments.

It is important to give historical context and perspective to the IFNM designation. In April 2001 then Arizona Governor Jane Dee Hull exchanged correspondence with then Secretary of Interior Gale Norton that is worth close examination.[28] One of Governor Hull's fundamental concerns was the process by which the IFNM was established (i.e., a Washington-centric exercise without meaningful state consultation or participation). Incredibly, Governor Hull noted that "neither I nor any member of my cabinet was ever invited to a public meeting to discuss the potential declaration of any monument." Further, Governor Hull stated that "the only sign that an area was under consideration for monument status was a visit to this state by the former secretary [Secretary Babbitt] for a short hike to which a handful of supporters and selected media were invited." Her account of the events was accurate. There was virtually no stakeholder involvement or consideration of the economic or other effects of the designation. Pima and Pinal County were the only local authorities involved and we know of no other state, tribal or local government dialogue or input in the short three month period of consideration.

From an economic standpoint, Governor Hull expressed concern about the high percentage of state land within the IFNM and that 95% of the revenue from those state trust lands within the IFNM belongs to Arizona's public schools. Governor Hull cited to current revenues from leases for grazing, agriculture, rights of way and commercial leases and the loss of future potential revenue from similar activities. With respect to mining, Governor Hull noted that there were several thousand acres of mineral estate within the IFNM and that state land was within the path of the projected trend of mineralization of the Silver Bell mine and that the new mining on those state lands was "stymied due to the restrictions placed on adjacent federal lands." Incredibly, she estimated a potential loss to the State of $100 million in mineral rights held by the State. The concerns she raised have proven to be true and will remain relevant in the future until the IFNM's boundaries are substantially reduced.

VI. Conclusion

Silver Bell urges the Secretary to thoroughly review the IFNM designation and to recommend modification of the monument boundary to include only the smallest area of land needed to accomplish the care and management of the valid historic and scientific objects within the IFNM. Such a review should include consideration of:

[28] *See* **Tab 9** including a copy of Governor Hull's letter to Secretary Norton dated April 6, 2001, redacted to include comments specific to IFNM.

1. historic and ongoing mining and mineral production in the Silver Bell Mountains, which has been a productive mining district since the 1800s, and the benefit of such activities to the American economy;

2. whether the Silver Bell Mountains and adjoining areas with valuable mineral resources are legitimate "objects" subject to protection under the Antiquities Act;

3. the existence of private and state land within the IFNM, and how to ensure that such lands are not subject to trespass and can remain productively utilized, as opposed to being treated as de facto parts of the IFNM and subject to the control of the BLM; and

4. the lack of coordination with stakeholders having significant interests impacted by the IFNM at the time it was created by President Clinton.

Silver Bell contends that a boundary adjustment is warranted. At a minimum, Silver Bell specifically requests a carve-out of certain of its unpatented claims as shown on the map attached hereto as **Tab 2**. If such an adjustment is undertaken, clarification must be provided to the BLM that the provisions of the IFRMP are no longer applicable and land management shall revert to the management prescriptions set forth in the Phoenix Resource Area RMP (1989). Regardless of the outcome of this review exercise, the BLM should be required to undertake an IFRMP amendment to properly inventory and evaluate management of lands with any wilderness characteristics in accordance with currently applicable BLM policy.

We truly appreciate the opportunity to provide comments pursuant to the Notice and are willing to answer any questions or provide further information if needed.

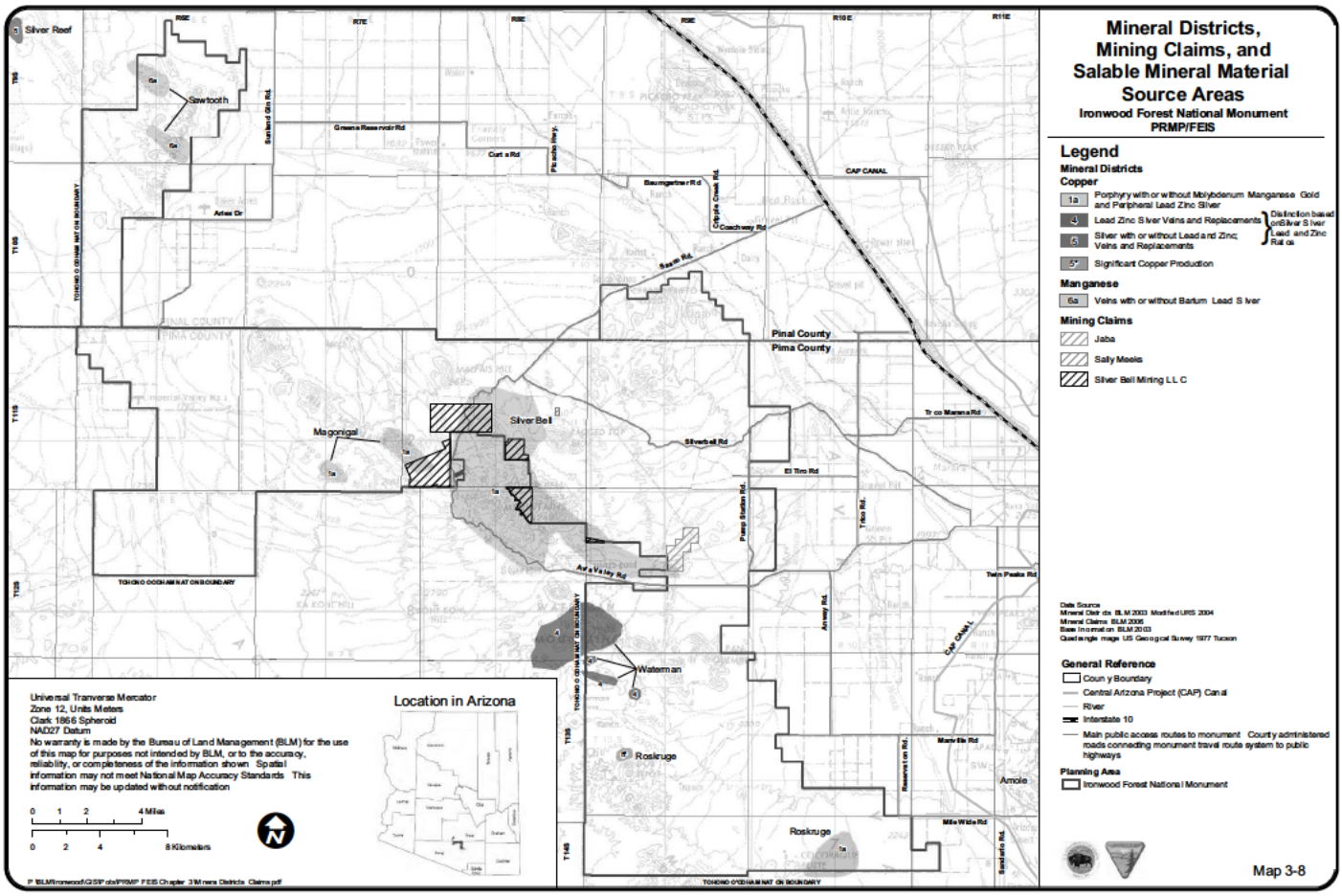
Sincerely,

Nancy Johannesmeyer, PE
Senior Manager, Environmental Affairs
Asarco LLC

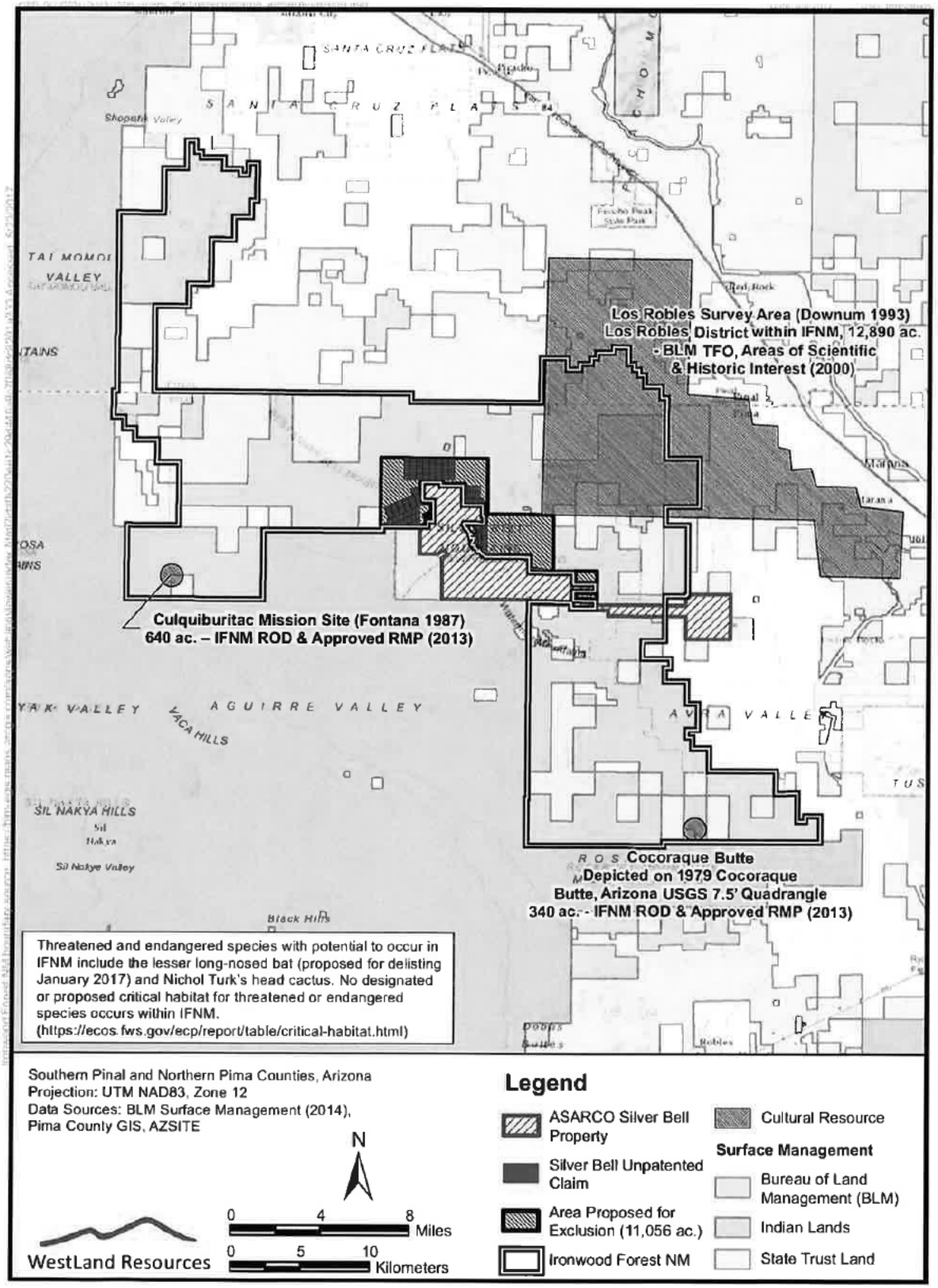
Enclosures

13000413.3/011797.0011

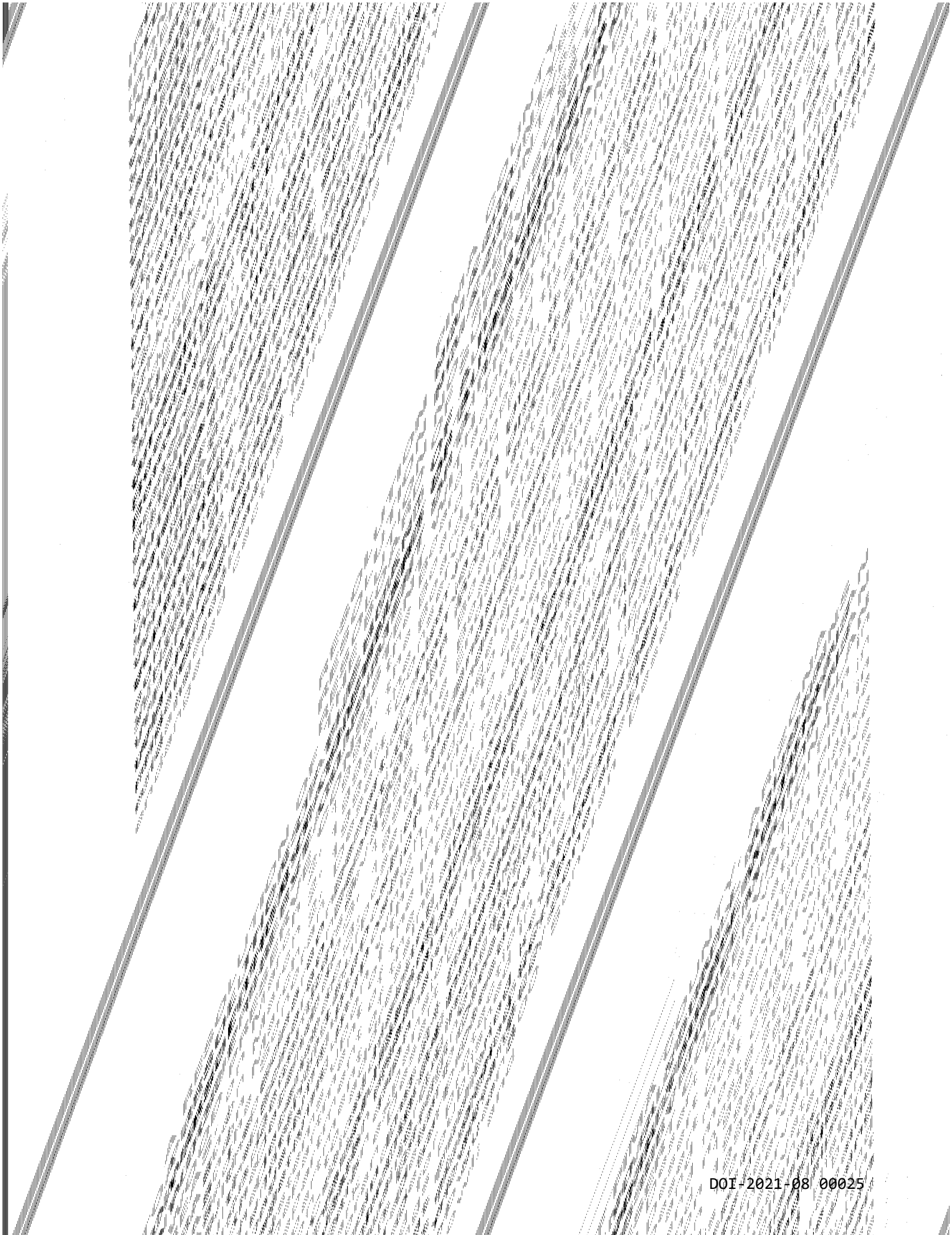
Tab 1

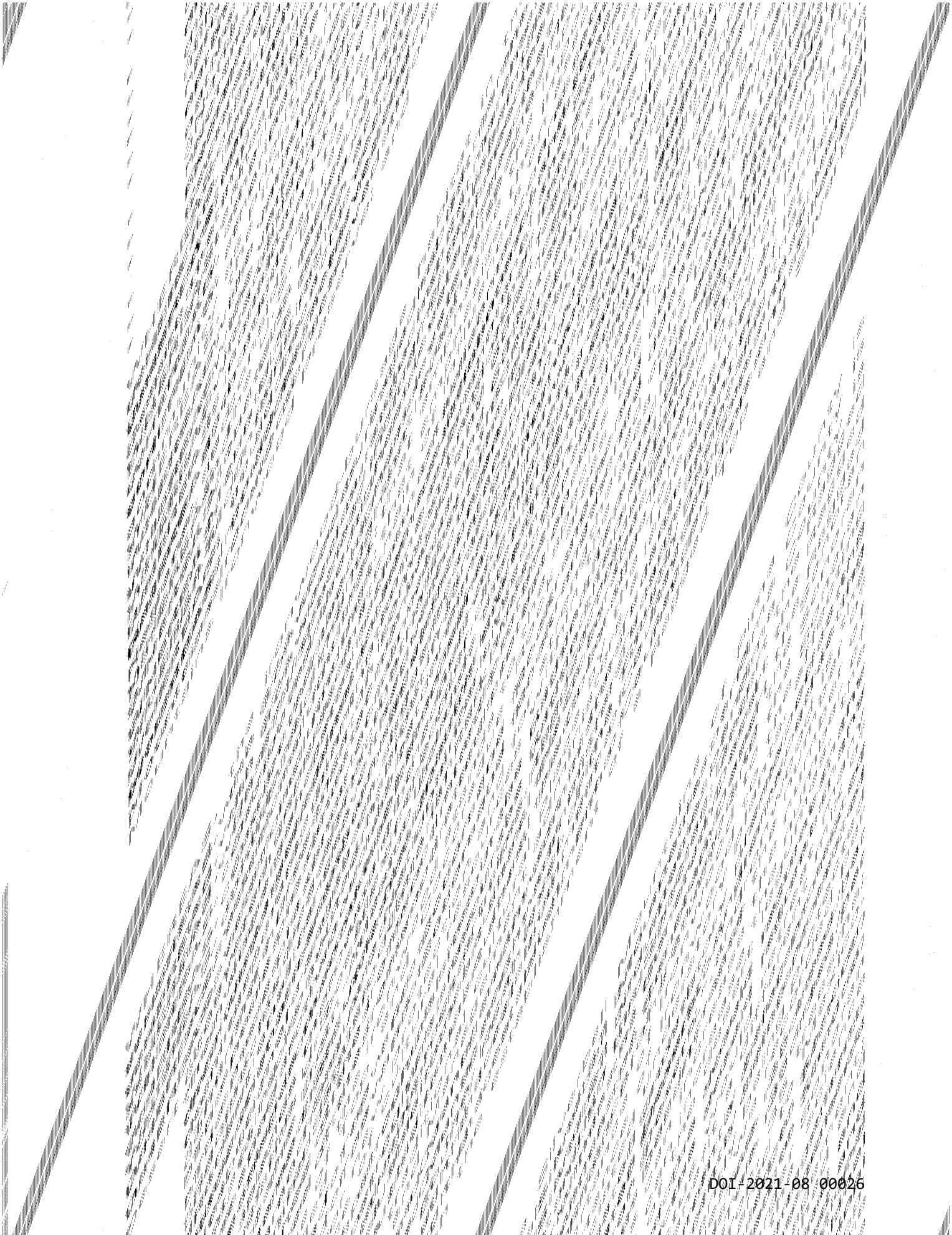

Mineral Districts, Mining Claims, and Salable Mineral Material Source Areas
Ironwood Forest National Monument
PRMP/FEIS
Legend
Mineral Districts
Copper
1a Porphyry with or without Molybdenum Manganese Gold and Peripheral Lead Zinc Silver
4 Lead Zinc Silver Veins and Replacements
5 Silver with or without Lead and Zinc; Veins and Replacements
Distinction based on Silver Silver Lead and Zinc Ratios
5* Significant Copper Production
Manganese
6a Veins with or without Barium Lead Silver
Mining Claims
Jaba
Sally Meeks
Silver Bell Mining LLC
Date Source
Mineral Districts BLM 2003 Modified URS 2004
Mineral Claims BLM 2006
Base Information BLM 2003
Quadrangle maps US Geological Survey 1977 Tucson
General Reference
County Boundary
Central Arizona Project (CAP) Canal
River
Interstate 10
Main public access routes to monument County administered roads connecting monument travel route system to public highways
Planning Area
Ironwood Forest National Monument
Map 3-8
Silver Reef
Sawtooth
Greene Reservoir Rd
Curtis Rd
Pinaleno Hwy
Baumgartner Rd
Coyote Creek Rd
Coachway Rd
Sasabe Rd
CAP CANAL
Arias Dr
Pinal County
Pima County
Magonigal
Silver Bell
Silverbell Rd
El Tiro Rd
Tucson Manana Rd
Pump Station Rd
Tiro Rd
Ajo Valley Rd
Twin Peaks Rd
Arivaca Rd
Waterman
Roskruge
Marsilia Rd
Reservation Rd
Arivaca
Mile Wide Rd
Sandario Rd
TOHONO OODHAM NATION BOUNDARY
Universal Transverse Mercator
Zone 12, Units Meters
Clark 1866 Spheroid
NAD27 Datum
No warranty is made by the Bureau of Land Management (BLM) for the use of this map for purposes not intended by BLM, or to the accuracy, reliability, or completeness of the information shown Spatial information may not meet National Map Accuracy Standards This information may be updated without notification
0 1 2 4 Miles
0 2 4 8 Kilometers
Location in Arizona

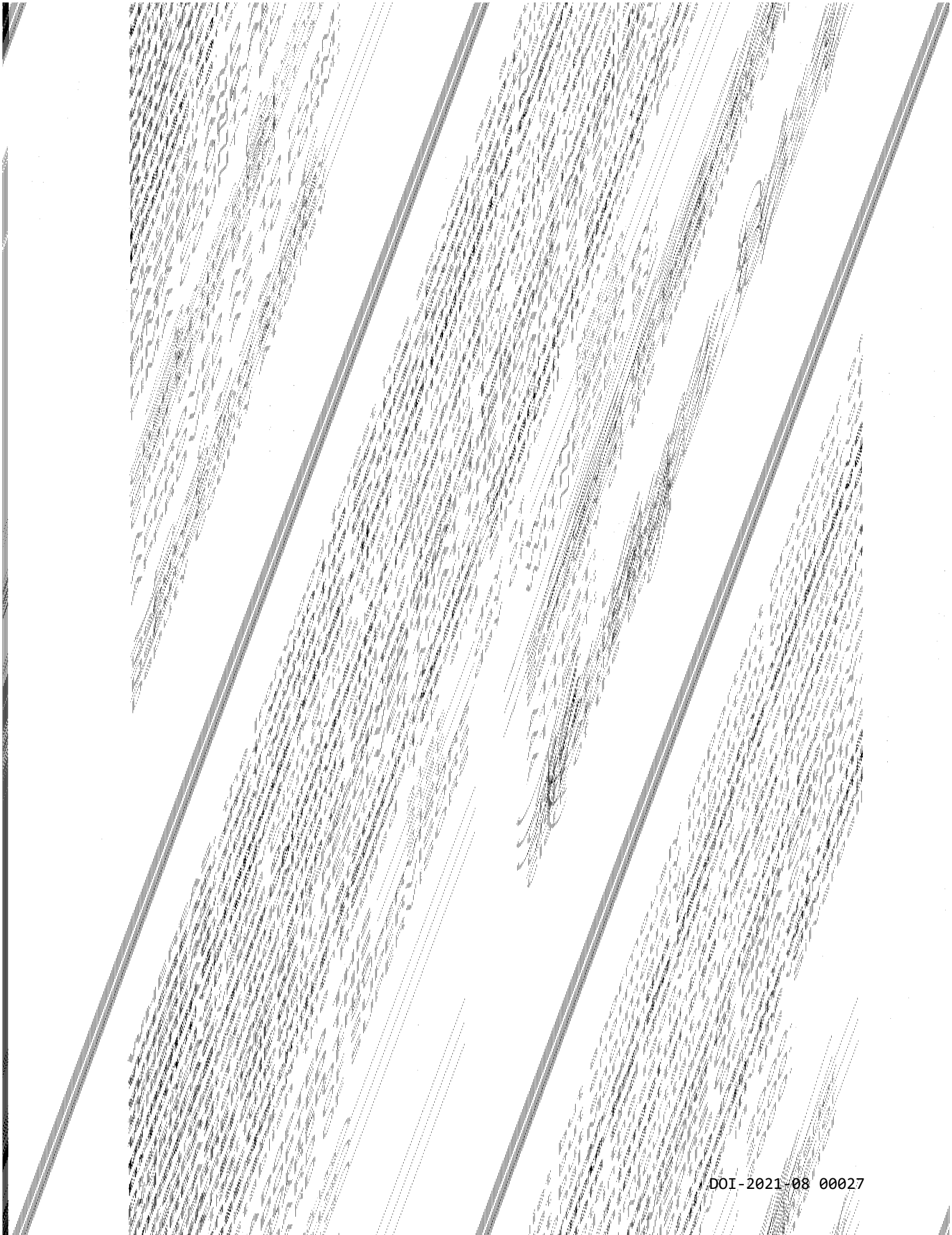
Tab 2


SANTA CRUZ FLATS
Shopaik Valley
TAI MOMOI VALLEY
Los Robles Survey Area (Downum 1993)
Los Robles District within IFNM, 12,890 ac.
- BLM TFO, Areas of Scientific
& Historic Interest (2000)
Culquiburitac Mission Site (Fontana 1987)
640 ac. – IFNM ROD & Approved RMP (2013)
AGUIRRE VALLEY
VACA HILLS
SIL NAKYA HILLS
Sil Nakye Valley
Cocoraque Butte
Depicted on 1979 Cocoraque
Butte, Arizona USGS 7.5' Quadrangle
340 ac. - IFNM ROD & Approved RMP (2013)
Black Hills
Threatened and endangered species with potential to occur in IFNM include the lesser long-nosed bat (proposed for delisting January 2017) and Nichol Turk's head cactus. No designated or proposed critical habitat for threatened or endangered species occurs within IFNM.
(https://ecos.fws.gov/ecp/report/table/critical-habitat.html)
Southern Pinal and Northern Pima Counties, Arizona
Projection: UTM NAD83, Zone 12
Data Sources: BLM Surface Management (2014),
Pima County GIS, AZSITE
N
0 4 8 Miles
0 5 10 Kilometers
WestLand Resources
Legend
ASARCO Silver Bell Property
Silver Bell Unpatented Claim
Area Proposed for Exclusion (11,056 ac.)
Ironwood Forest NM
Cultural Resource
Surface Management
Bureau of Land Management (BLM)
Indian Lands
State Trust Land

Tab 3







Tab 4

KANEEN
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Tucson, Arizona 85712
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Fax 520.885.0311

IRONWOOD FOREST NEWS MEDIA COVERAGE

Newspaper Coverage

Arizona Daily Star	03/21/00	Babbitt's help sought to protect Pima ironwoods
Tucson Citizen	03/21/00	County seeks U.S. ironwood preserve
Arizona Daily Star	03/22/00	Babbitt favors saving iron-wood wonderland
Tucson Citizen	03/22/00	Residents split on national monument plan
Tucson Citizen	03/22/00	Babbitt says he'll work to preserve ironwoods
Arizona Republic	03/23/00	Babbitt's aid sought in protecting forest
Arizona Daily Star	03/24/00	Fitz's View – cartoon
Arizona Daily Star	03/24/00	Editorial – Protect the ironwoods
Tucson Citizen	03/29/00	Editorial - Our Opinion: Monument Plan
Tucson Citizen (related map)		Development encroaches on ironwood forest (map)

more

Television Coverage

March 21, 2000

KVOA (NBC)	Noon
KGUN (ABC)	Noon
KOLD (CBS)	Noon
KVOA (NBC)	5:00 PM
KGUN (ABC)	5:00 PM
KVOA (NBC)	6:00 PM
KGUN (ABC)	6:00 PM
KOLD (CBS)	6:00 PM
KUAT (PBS)	6:30 PM
KGUN (ABC)	10:00 PM

March 24, 2000

KUAT (PBS)	6:30 PM

March 27, 2000

KOLD (CBS)	6:00 PM

Babbitt's help sought to protect Pima ironwoods

By Joe Salkowski
The Arizona Daily Star

The Pima County Board of Supervisors is set to ask Interior Secretary Bruce Babbitt today to push for federal protection of up to 95,000 acres of ironwood-forested land on the county's northwest edge.

The proposed Ironwood National Monument would encompass federal and state land in the Silver Bell and Ragged Top mountains northwest of Tucson. It would preserve the county's thickest stand of ironwood trees, which provide critical habitat for the endangered pygmy owl and a variety of desert species.

"The land has great ecological value as well as archaeological value," said Board Chairwoman Sharon Bronson, a Democrat whose district includes the Silver Bell-Ragged Top area. "It's really just prime habitat."

Babbitt, a former Arizona governor and state attorney general, agreed to attend today's supervisors' meeting to discuss the county's Sonoran Desert Conservation Plan, which would safeguard 400,000 acres from development. The area of the proposed monument is targeted for protection in the plan.

The county has yet to complete a study designed to identify areas where preservation efforts would have the most ecological impact. But a recent study by the Arizona-Sonora Desert Museum highlights the importance of ironwood trees found in the Silver Bell-Ragged Top area.

The area, which borders the Tohono O'odham Reservation on the west and the Pinal County line on the north, is also home to a number of ancient petroglyphs and the remains of a Hohokam village.

Most of the land proposed for preservation is owned by the federal Bureau of Land Management, while the rest is

See IRONWOODS, Page 12A

Front Page AZ Daily Star 3-21-00

Ironwoods

Continued from Page One

owned by the state. Some mineral mining has occurred on the land, but that would stop if the area were designated a national monument, Bronson said.

County staff has prepared two proposals for supervisors to consider. The first would ask Babbitt to press for protection of 96,000 acres in the Silver Bell-Ragged Top area as well as in the Waterman-Roskruge mountains. The second proposal would exclude the Waterman-Roskruge area and protect 73,600 acres.

County Manager Chuck Huckelberry said the proposal should be popular with area residents.

"They have actually requested special protection for that area, which was originally left out of the mountain park area," he said. "Our interest is parallel with theirs. We haven't heard any specific objection to this proposal."

County seeks U.S. ironwood preserve

By BLAKE MORLOCK
Citizen Staff Writer

U.S. Interior Secretary and former Arizona Gov. Bruce Babbitt was to meet today with county officials seeking creation of a national monument on the Northwest Side.

Pima County officials want to protect more than 71,000 acres of ironwood forest from development. They planned to ask Babbitt for help in persuading President Clinton to create a 96,000-acre public preserve. The preserve would encompass parts of the Waterman-Roskruge and Silverbell mountain ranges that are made up entirely of state and federal land, County Administrator Chuck Huckelberry said.

The president could unilaterally establish the Ragged Top and Silverbell Mountains Ironwood National Monument acres, to present to Babbitt.

Neither BLM nor state land manages land to be preserved. Both are available for commercial interests such as grazing and, in some instances, development.

Babbitt is in town to hear an update on the Sonoran Desert Conservation Plan, a broader effort to protect the lush desert from growth.

Huckelberry said the preserve would be a "significant step" in the conservation plan.

The ironwood forest is high on a list of priorities for protection because the trees make soil richer and provide cover for wildlife. In the Ragged Top-Silverbell area, there are 14 ironwoods per acre.

The ironwoods are also prime habitat for the endangered pygmy owl.

The preserve is in the district of Sharon Bronson, chairwoman of the county Board of

3-21-00 Tucson Citizen Fro

Babbitt favors saving ironwood wonderland

By Joe Salkowski
The Arizona Daily Star

Interior Secretary Bruce Babbitt says the proposed Ironwood National Monument is a pristine desert wonderland worthy of long-term protection.

He should know: After hearing the Pima County Board of Supervisors make a pitch for the monument at its meeting yesterday, the former Arizona governor hiked to a high mountain pass in the area to take in the view for himself.

"It's a spectacular corner of the county," Babbitt said from a crest atop Ragged Top, a craggy peak about 30 miles northwest of Tucson.

Supervisors voted unanimously yesterday to call for federal protection of 96,000 acres of land encompassing the Silver Bell-Ragged Top range and the Waterman-Roskruge mountains.

Babbitt stopped short of endorsing their recommendation, saying he needs to study the land further. In particular, he said, he'd like to consider preserving existing copper mining operations west of the Silver Bell Mountains.

"An hour's hike is just the beginning of an inquiry into the history and meaning of this land," he said. "We've got a lot of work to do."

Babbitt said he didn't know much about the land before walking into yesterday's meeting, where he was told the area is home to Pima County's thickest stand of ironwood trees.

"Ironwood ecosystems provide habitat for more than 500 species of plants and animals," said Richard H. Daley, executive director of the Arizona-Sonora Desert Museum.

"Ironwood habitat is being fragmented badly, making the remaining major populations of ever-increasing significance," Daley told Babbit and the supervisors. "In some areas, up to 50 percent of the ironwood habitat is being damaged directly by development."

That isn't the case in the proposed preserve, a thick desert forest where ironwood trees mingle with saguaro cacti and palo verde trees. Mineral mining operations present the most immediate threat to vegetation in the area, Pima County Administrator Chuck Huckelberry said.

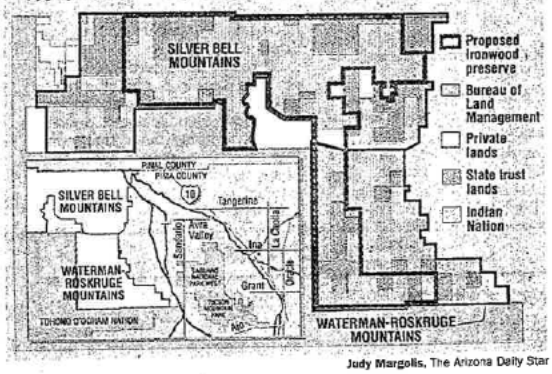
The area was targeted for protection by the county's Sonoran Desert Conservation Plan, which would safeguard 400,000 acres around the county from further development.

While most land in the area is fed-

See IRONWOOD, Page 7A

Proposed Ironwood National Monument

The Pima County Board of Supervisors asked Interior Secretary Bruce Babbitt yesterday to push for federal protection of 96,000 acres of mountainous land northwest of Tucson. The land is home to the county's thickest stand of ironwood trees, which provide critical habitat for the pygmy owl and other desert creatures.



Judy Margolis, The Arizona Daily Star

FOIA001:01728005

Babbitt says he'll work to preserve ironwoods

■ But he won't go out on a limb by vowing to back monument status.

By BLAKE MORLOCK
Citizen Staff Writer

Interior Secretary Bruce Babbitt yesterday vowed to work to preserve Pima County's thickest ironwood forest. But he stopped short of promising a national monument.

With Ragged Top Mountain's two jagged peaks on both sides of him, Babbitt took in a panorama of the ironwood-studded Sonoran Desert.

Back down at the foot of the steep, rocky slopes on the far Northwest Side, he vowed to help preserve the county's thickest ironwood forest from development.

"I didn't realize there was anything this special out here," Babbitt said. "This is as fine a piece of Sonoran Desert as I've seen. It needs our attention."

Yet Babbitt, who served as Arizona's governor from 1980-88, said he's not convinced the county's proposal to turn 71,680 acres of U.S. Bureau of Land Management property into a national monument is the best option.

"I'm not in the business of surprises," Babbitt said. "There will be no strokes of lightning creating monuments here today. These things need to be worked out."

Babbitt said he first wants to talk with the people with an interest in this expanse of desert before recommending President Clinton convert it into the Silverbell and Ragged Top Ironwood National Monument.

Babbitt made the trek into the mountains with media, his staff, and County Administrator Chuck Huckelberry to see what he couldn't see on maps at an earlier Pima County supervisors' meeting.

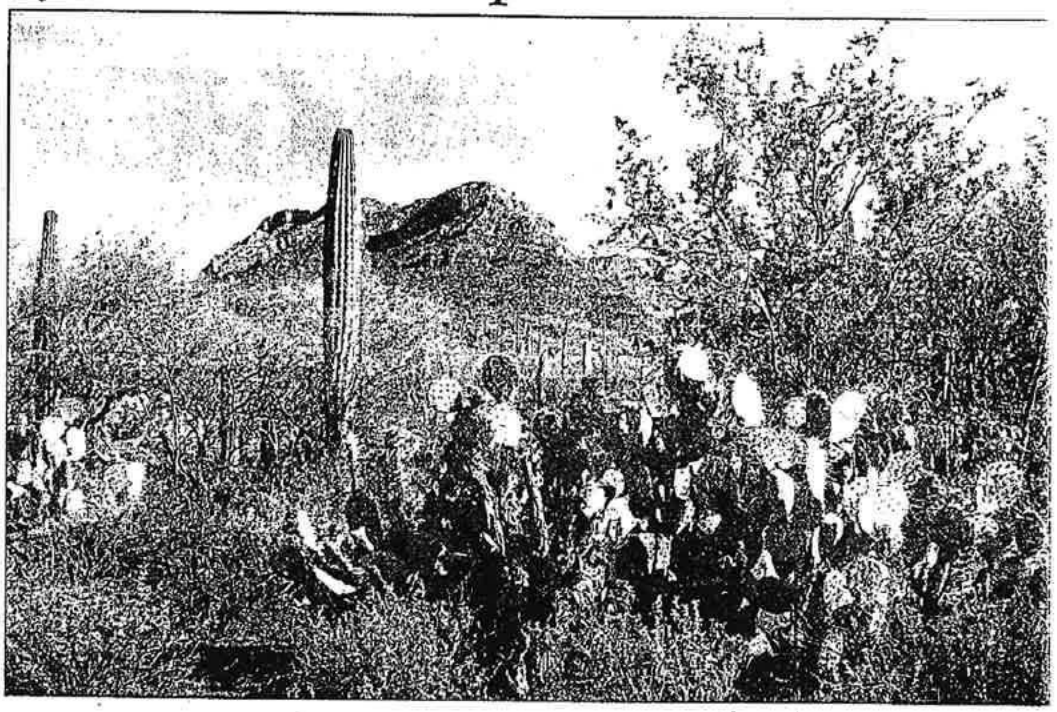
During the meeting, he lavished praise on Pima County for its ambition and speed in creating the framework for the Sonoran Desert Conservation Plan.

The plan would protect endangered species, cultural resources and vast portions of desert from development.

Babbitt also pledged to help by crafting federal land policy to match Pima County's public will.

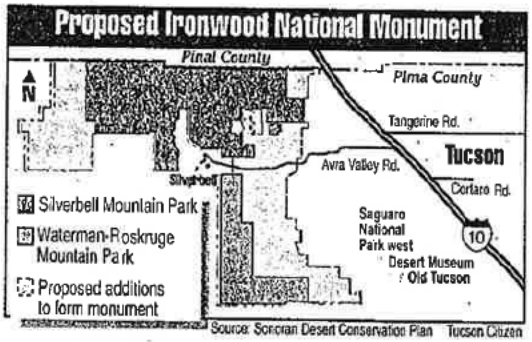
"My desire on my watch is to make certain your public lands are aligned to give maximum boost to get your (Sonoran Desert

BABBITT, continued/4C



Photos by NORMA JEAN GARGASZ/Tucson Citizen

This desert vista would be protected from development under a proposal to set aside 90,000 acres northwest of Tucson as Ironwood National Monument. The area is home to thousands of ironwoods, including the one in the background at right.



U.S. Interior Secretary Bruce Babbitt discusses national monument plans with Myra Smith, who lives near its proposed boundaries.

DOI-2021-08 00034

Babbitt says he'll work to preserve ironwoods

Continued from Page 1C

Conservation) Plan completed," Babbitt said.

Protecting ironwood is a big part of that plan.

Richard H. Daley, executive director of the Arizona-Sonora Desert Museum, said ironwood is a bellwether species, measuring the health of its ecosystem.

"Ironwood forests are being fragmented badly, making the remaining populations of ever-increasing significance," Daley said.

"In some areas as much as 50 percent of ironwood is being lost to development."

The forests surrounding the Silver Bell, Ragged Top and Waterman-Roskruge mountains – some 35 miles from downtown Tucson – top Huckelberry's list for preservation.

Huckelberry said the proposed national monument's ironwood density is four times greater than that of any other ironwood forest in Pima County.

During the meeting, Huckelberry proposed setting aside 71,680 acres of BLM property and 24,320 acres of state land as a national monument.

BLM land may be mined, grazed and cut. Creating a national monument would allow for a custom-made set of protections and allowances.

It could prevent mining – one of the more immediate threats to the land, for example – but allow grazing.

The president has the authority to establish national monuments on federal land but the state must approve preservation of its trust land.

Huckelberry said because the State Land Department adheres strictly to its constitutional requirement to sell land for the highest value, preserving that portion of the monument could be tricky.

Babbitt and Huckelberry said BLM could trade land outside the national monument for state land inside the boundaries.

Babbitt is already proposing such a trade to create Las Cienegas National Conservation Area.

Environmentalists are largely in favor of the national monument proposal, with caveats.

David Hogan of the Center for Biological Diversity said swapped state land could entice developers to ring the monument with subdivisions, contributing to more sprawl and harm to the forest.

"Basically it's a good idea," he said. "We just want to pay special attention to the kinds of land swaps they are proposing."

BABBITT'S PROPOSED PLAN

Interior Secretary Bruce Babbitt could pursue several options in protecting federal land that Pima County wants kept free from development.

■ National park: This is the highest form of protection and requires an act of Congress. Park status means limited motor vehicle access, rules for just about all activities and stringent regulations on land development.

■ National monument: It would establish some protections and restrict land uses. The amount would depend on how the law creating the monument were customized.

The president may create a national monument by signing an executive order. Death Valley National Monument, for example, was established on Herbert Hoover's last day in office. No president has ever revoked national monument status.

Mineral withdrawal: This allows the secretary of the Interior to revoke current and future mining rights on federal land. It does not affect grazing or other types of development.

■ National conservation area: Does not prevent uses, but allows private land owners to set aside land for preservation in exchange for tax credits or land elsewhere.

Source: Department of the Interior

FOIA001:01728005

Ironwood

Continued from Page One

erally owned, the proposed monument encompasses some 24,000 acres of state trust land that might someday be developed, Huckelberry said.

That threat would be removed, though, if those acres were ceded to the federal government in a swap for other federal land.

Babbitt said land swaps would likely be part of any plan to protect the region. His options include asking President Clinton to declare the land a national monument, petitioning Congress to do the same thing or asking Congress to create a National Conservation Area.

The protections offered by those designations are subject to negotiation, Babbitt said. He also said he might consider less dramatic designations that would simply restrict mining operations to certain areas.

"We haven't done enough talking yet with people around this area to see what they want to do," he said.

Babbitt was dressed in a suit and tie for yesterday's meeting but changed into casual clothes for a visit to the proposed monument.

"It's amazing out here," he said, looking up from the desert floor toward Ragged Top. "It's like the Saguaro National Monument with this dramatic backdrop."

After reaching the base of Ragged Top, Babbitt declared that he wanted to climb the mountain to get a better look at the land. Seeing no obvious trail to the top, he started off anyway, climbing under a barbed wire fence with help from a few aides.

He led a group of reporters and government aides through the rugged desert terrain, keeping a merciless pace that his companions — dressed in smooth shoes and business attire — had difficulty matching.

Upon reaching the top, he marveled at the view for a moment before quizzing a winded Huckelberry and anyone else within earshot about the land now spread before him. He investigated a topographical map and sounded anxious to get his hands on geological data for the proposed monument.

"This land richly deserves permanent protection as part of the Sonoran Desert Conservation Plan," he pronounced. Existing mineral mines west of the Silver Bell Mountains might have to be exempted from any preservation plan, he said.

"But that shouldn't affect the rest of this," he said, looking out over the distant valley floor. "This is pristine land."

James S. Wood, The Arizona Daily Star

John Wiens, horticulturist, left, Babbitt, Pima County Administrator Chuck Huckelberry and Babbitt assistant Gail Kobetich discuss the proposed Ironwood National Monument.

DOI-2021-08 00036

Babbitt's aid sought in protecting forest

AZ Republic 3-23-00

By Arthur H. Rotstein
Associated Press

TUCSON — Campaigning for a new national monument that would protect an ironwood forest near Tucson, Pima County supervisors this week lobbied for creation of a nearly 100,000-acre preserve as a first step.

They did so with Interior Secretary Bruce Babbitt — hoping to persuade him to lobby President Clinton on their behalf.

Babbitt on Tuesday hiked through a portion of the Ragged Top Mountains, part of a rugged 96,000-acre expanse in northwestern Pima County that encompasses the Silverbell Mountains. The area includes more than 71,000 acres owned by the Bureau of Land Management, one of the agencies Babbitt oversees.

The proposed preserve also would encompass about 24,000 acres of state land and would provide a buffer along the Tohono O'odham Indian Nation.

Under the Antiquities Act of 1906, Clinton can create a national monument by executive order without congressional action, but Babbitt did not commit himself to urging Clinton to do so.

"What I see once again really interests me," Babbitt said. "And I am eager to hear suggestions for how it is we can make certain that that land ultimately becomes a part of the Sonoran Desert (Conservation) Plan."

Babbitt called that conservation plan "the best in the West, pure and simple."

Land use studies and conservation efforts are under way in communities across the country, "but in terms of the progress and enthusiastic vision, I've got to tell you, none of them match the effort that is going on here," the former Arizona governor said.

Babbitt said that the ironwood forest proposal deserves study but that mineral mining operations west of the Silver Bell Mountains might have to be exempted from any preservation plan.

Meanwhile, Babbitt criticized the state of Arizona's approach to the sale of state land within the proposed Las Cienegas National Conservation Area southeast of Tucson.

He proposed a state-federal land exchange in which the state's school trust would yield the lands within the Las Cienegas site and would select other lands of equal value appropriate for development outside such rural communities as Kingman, Safford, Yuma, Lake Havasu City and Bullhead City.

A hearing last week on legislation sponsored by Rep. Jim Kolbe, R-Ariz., to create the Las Cienegas National Conservation Area was moderately contentious, he said.

Babbitt said he refrained from discussing alternatives then, "but they're out there, and it remains my hope that we can get a legislated national conservation area."

"There is no question that that would be best," he said.

The Las Cienegas National Conservation Area is almost all BLM or state public land. The problem, Babbitt said, is that the state insists that its land should yield the maximum dollar return to the state trust — its interpretation of a legal requirement.

Unless something is done, "maximum dollar" could mean subdividing and developing the state lands — about 100,000 of the 210,000 acres in the proposed national conservation area, Babbitt added.

Of the state holdings, the Land Department would bar development on only 4,219 acres within Las Cienegas, less than 4 percent, Babbitt said: "The state response so far really isn't what it ought to be."

Several people, including the executive director of the Arizona-Sonora Desert Museum and area residents, urged Babbitt to act on the ironwood preserve. Residents said some ironwood trees several hundred years old already have been lost because of a sand-and-gravel operation at Ragged Top.

"Ironwood habitat is being fragmented badly, making remaining populations ever-increasing of importance," museum director Richard Daley said.

"In some areas, up to 50 percent of the ironwood habitat is being damaged directly by development," he said.

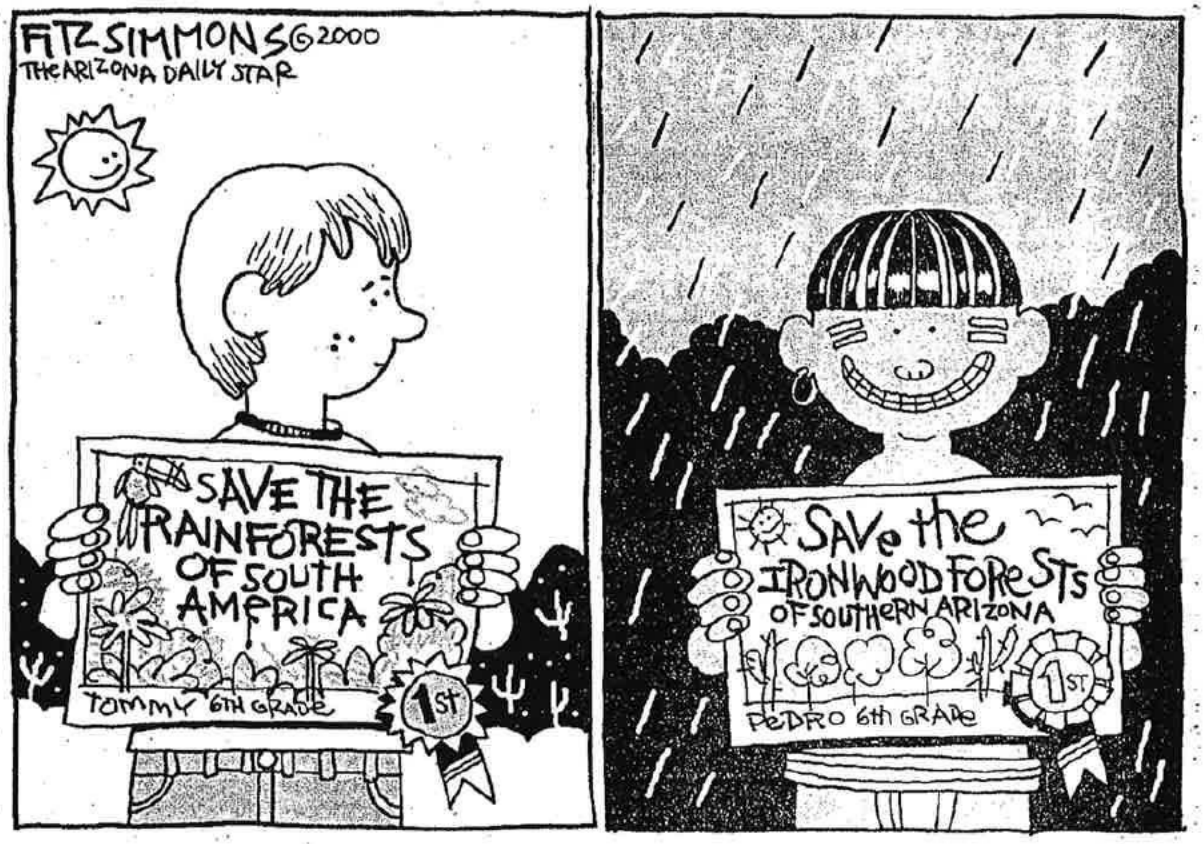
Ragged Top is the densest area of ironwood forest in Pima County, providing habitat protection for about 500 plant and animal species, including the endangered cactus ferruginous pygmy owl.

Associated Press

Interior Secretary Bruce Babbitt hikes the Ragged Top Mountains, part of the proposed preserve.

Tucson, Friday, March 24, 2000

FITZ'S VIEW



FOIA001:01728005

3-24-00

Comment

The Arizona Daily Star

Founded 1877

Jane Amari, Editor and Publisher

James M. Kiser, Editorial Page Editor

Bobbie Jo Buel, Managing Editor

EDITORIALS

Protect the ironwoods

We hope Interior Secretary Bruce Babbitt adds Ironwood National Monument to his already impressive record of preserving Western lands.

Babbitt listened to the Pima County Board of Supervisors' proposal to preserve 96,000 acres in the Silver Bell and Waterman-Roskruge mountains.

"Ironwood ecosystems provide habitate for more than 500 species of plants and animals," said Richard H. Daley, executive director of the Arizona-Sonora Desert Museum. Daley told Babbitt: "Ironwood habitat is being fragmented badly, making the remaining major populations of ever-increasing significance. In some areas, up to 50 percent of the ironwood habitat is being damaged directly by development."

Andrew A. Lipsky, a biologist for Arizona Fish and Game points out that 160 species of plants and 80 bird species use ironwood trees. The trees do not provide nesting places for birds. However, cacti that grow beneath them fulfill that function. The trees attract insects. Birds and reptiles are attracted to insects.

Lipsky says Ironwoods reach 45 feet and live as long as 1,500 years. As the tree grows, it provides shelter for fauna and flora. It matures into a micro habitat. The temperature beneath the tree can be 15 degrees cooler than desert five feet away. It acts as a nursery for starting saguaros and other plants.

County Administrator Chuck Huckleberry said the greatest threat to the area is from mining. Most of the land is federally owned. But 24,000 acres is state trust land, which means it could be developed. The state land could be traded for other federal land.

Babbitt climbed to the crest of one the mountains. "It's a spectacular corner of the county," he said.

That it is.

It should be protected.

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March 29, 2000

S.az Southern Arizona Online • A publication of the Tucson Citizen

Our opinion: Monument plan

Plans to create a national monument to protect 96,000 acres of state and federal land in northwestern Pima County would block further mining of the ironwood forest area.

That alone is reason to support the plan being pitched by Interior Secretary Bruce Babbitt.

ASARCO Inc. already has mining rights on eight square miles of land near the proposed preserve. Nothing can be done about that. But the threat of future mining claims is the biggest threat to the area, according to County Administrator Chuck Huckelberry.

Ironwood forests are prime habitat for the endangered pygmy owl, whose presence on the Northwest Side led to a long legal battle and delays in building a new elementary school in the Amphitheater school district.

Babbitt wants President Clinton to create the new monument by executive order to avoid potential obstacles in Congress.

Clinton should do just that.

Section front Home

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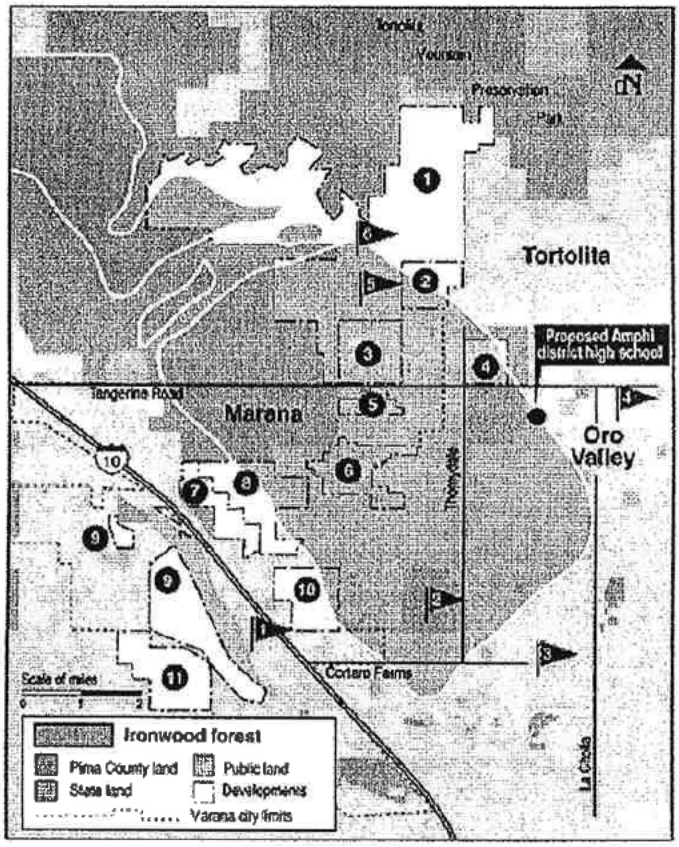
Development encroaches on ironwood forest



Nearly a dozen developments are zoned for a combined 34,000-plus homes in and around 30 square miles of ancient ironwood forest in northwest Tucson.

Developments

	Development	Acres	Homes
1	Dove Mountain	5,600	9,000
2	Foothills	414	1,471
3	For sale	840	-
4	Forest City	309	1,199
5	Tangerine Hills	196	784
6	Hartman Hills	500	4,376
7	Northgate	487	1,401
8	Acacia Hills	600	3,627
9	Continental Ranch	2,310	9,434
10	Hartman Vistas	500	-
11	Pima Farms	738	2,770

Numbers of acres are estimates; numbers of homes are targets

Golf courses

1. The Links at Continental Ranch
2. Arthur Pack Desert Golf Course
3. Omni Tucson National Golf Resort
4. El Conquistador Country Club
5. Heritage Highlands Golf & C.C.
6. The Gallery Golf Course

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Babbitt says he'll work to preserve ironwoods

Continued from Page 1C

ed," Babbitt said.

Protecting ironwood is a big part of that plan.

Richard H. Daley, executive director of the Arizona-Sonora Desert Museum, said ironwood is a bellwether species, measuring the health of its ecosystem.

"Ironwood forests are being fragmented badly, making the remaining populations of ever-increasing significance," Daley said.

"In some areas as much as 50 percent of ironwood is being lost to development."

The forests surrounding the Silver Bell, Ragged Top and Waterman-Roskruge mountains – some 35 miles from downtown Tucson – top Huckelberry's list for preservation.

Huckelberry said the proposed national monument's ironwood density is four times greater than that of any other ironwood forest in Pima County.

During the meeting, Huckelberry proposed setting aside 71,680 acres of BLM property and 24,320 acres of state land as a national monument.

BLM land may be mined, grazed and cut. Creating a national monument would allow for a custom-made set of protections and allowances.

It could prevent mining – one of the more immediate threats to the land, for example – but allow grazing.

The president has the authority to establish national monuments on federal land but the state must approve preservation of its trust land.

Huckelberry said because the State Land Department adheres strictly to its constitutional requirement to sell land for the highest value, preserving that portion of the monument could be tricky.

Babbitt and Huckelberry said BLM could trade land outside the national monument for state land inside the boundaries.

Babbitt is already proposing such a trade to create Las Cienegas National Conservation Area.

Environmentalists are largely in favor of the national monument proposal, with caveats.

David Hogan of the Center for Biological Diversity said swapped state land could entice developers to ring the monument with subdivisions, contributing to more sprawl and harm to the forest.

"Basically it's a good idea," he said. "We just want to pay special attention to the kinds of land swaps they are proposing."

BABBITT'S PROPOSED PLAN

Interior Secretary Bruce Babbitt could pursue several options in protecting federal land that Pima County wants kept free from development.

■ National park: This is the highest form of protection and requires an act of Congress. Park status means limited motor vehicle access, rules for just about all activities and stringent regulations on land development.

■ National monument: It would establish some protections and restrict land uses. The amount would depend on how the law creating the monument were customized.

The president may create a national monument by signing an executive order. Death Valley National Monument, for example, was established on Herbert Hoover's last day in office. No president has ever revoked national monument status.

Mineral withdrawal: This allows the secretary of the Interior to revoke current and future mining rights on federal land. It does not affect grazing or other types of development.

■ National conservation area: Does not prevent uses, but allows private land owners to set aside land for preservation in exchange for tax credits or land elsewhere.

Source: Department of the Interior

FOIA001:01728005

Pima County proposes site for preserve

By Judd Slivka
The Arizona Republic

Pima County wants the federal government to set aside nearly 100,000 acres of desert, some of the last undeveloped open space along Interstate 10 between Phoenix and Tucson, to protect a rare tree and other wildlife.

The proposed Ironwood Preserve plan, which some environmentalists want declared a national monument, was given to Interior Secretary Bruce Babbitt during a recent visit to Tucson.

The proposed area would stretch from west of Marana to the eastern edge of the Tohono O'odham Reservation, and from the Silver Bell Mountains north toward Casa Grande.

If the Ironwood plan, named for one of the largest ironwood tree stands in the Southwest, is approved, it will allow for a federally protected wilderness area along the sprawling Phoenix-Tucson axis.

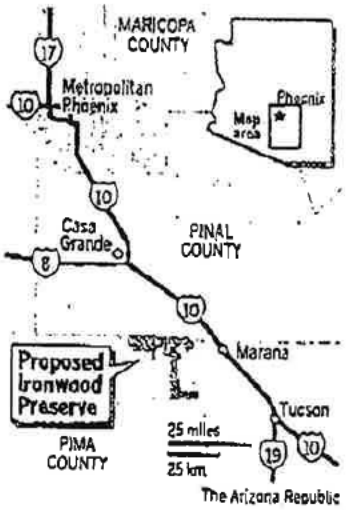
The area is home to the endangered pygmy owl and the desert tortoise, as well as a migratory pathway for bighorn sheep. It also has extensive Hohokam ruins and petroglyphs.

"The area has one of the highest levels of species richness anywhere," said Craig Miller of Tucson, a spokesman for the national environmental group Defenders of Wildlife.

"Ironwoods, what the plan is named for, are an umbrella species. They host many organisms," Miller said.

There are two proposals before the Interior Department. The larger proposal would incorporate the Ragged Top and Cocoraque areas and include buffer land around the Tohono O'odham Reservation. It would incorporate more than 71,000 acres of U.S.

See PRESERVE | Page B7



From Page B1

Bureau of Land Management land and about 24,000 acres of state land.

The smaller proposal would protect the Ragged Top area and would bring about 57,000 acres of federal land and more than 16,600 acres of state land under protection.

In either plan, provisions would have to be made for companies or individuals that have prior land-use rights, typically for mining or grazing.

The area around Tucson has been under consideration for some kind of preservation, be it as a series of parks or as preserves, under Pima County's Sonoran Desert Conservation plan.

But the Ironwoods plan is a marked departure from established protocol. The Pima County Board of Supervisors approved it and presented it to Babbitt, requesting national monument status, rather than the federal government deciding on its own what to protect.

Miller, the wildlife advocate, would like to see the proposal expanded to allow a corridor east to the Tortolita fan, the better to connect the pygmy owls in one area to pygmy owls in the other.

The Interior Department, meanwhile, has several of these projects to decide on, including Las Cienegas wilderness reserve south of Tucson. The department has taken no position on the Ironwoods plan, except to say it is studying it.

A spokesman for the federal agency also would not say whether the area was being considered for a wilderness, which would add more protection, a preserve or a national monument.

"Our folks are going to look at it," Babbitt spokesman Tim Ahern said. "We need to gather a lot more facts on it. But we can move pretty fast on these if we have to."

Reach the reporter at Judd.Slivka@ArizonaRepublic.com or (602) 444-8097.

AZ Republic
4-6-00

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Tucson Citizen 4-5-00

Letters to the editor

Can we trust county leaders?

The March 25 article, "Part of ironwood preserve is ASARCO's," quoted County Administrator Chuck Huckelberry as saying, "If we included (ASARCO land), it was a mistake and we'll fix it." Again, later in the article, he was quoted, "You ask for what you want and then you lose some around the edges. . . . If you don't ask for it, though, you don't get it."

The last quote makes the first one suspect. He is saying that he included ASARCO land (asked for it) knowing he might not get it. Otherwise, if it truly was a mistake, it still makes us unsure of being able to trust him. That is too big of a "mistake." Either way it is a sad commentary on what taxpayers are receiving for the high salary that is paid to him.

The reporting did not seem to be as accurate as it should be, either. I do not know much about mining claims, but if anyone, either a company or an individual, has a properly recorded and properly maintained deed to a mining claim, there is no need to "grandfather" those claims. The legal deed supersedes any new procedure that any level of government might institute.

County Supervisor Raul Grijalva is quoted as saying, "It would be an uphill fight" to "get around those basic rights." For a governmental representative – elected or hired – to even suggest the possibility of taking away such rights is unethical. Government at any level should be protecting "basic rights," not be looking for a way to "get around" them.

Again, sadly, I ask, can we trust our county leadership? Can we trust them to set a good example by doing what is legally and ethically proper? The article made it sound like we cannot trust them.

ARTHUR W. COATS

Acm

D.J.D.

MAR 29 2000

March 29, 2000

S.az Southern Arizona Online • A publication of the Tucson Citizen

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Clinton should do just that.

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Homesick Babbitt is done with politics

By Jeff Barker
Republic Washington Bureau
April 30, 2000

AP Photo/Heesoon Yim

Interior Secretary Bruce Babbitt at his office in Washington.

WASHINGTON - Interior Secretary Bruce Babbitt, weary of Washington's "witch-hunting mentality" and homesick for Arizona, says he'll return to the state when his service in the Clinton Cabinet ends, but he won't run for governor in 2002.

"You'll be seeing a lot more of me in Arizona now," the former Arizona governor said in an exclusive interview.

"People have asked me, 'Why is it that you are involved so deeply in these growth and open-space issues in Arizona? And you know, do you have some kind of agenda? Are you coming home to run for governor again?' "

"My answer is, 'I'm out of politics, but I am back to Arizona,' " Babbitt said. "I've been away from Arizona for a long time. I'm a little bit homesick. I want to re-engage in Arizona as a citizen."

Babbitt said a painful, 19-month independent counsel investigation that ended last year actually had a positive impact of sorts: "It caused me to focus on what I really wanted to do. I guess I can console myself by saying well, maybe I was the poster child for the repeal of the independent counsel statute."

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FOIA001:01728005

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Wednesday afternoon
March 22, 2000

A dinner you can't refuse
Taste: 'Sopranos' inspires feast

SPORTS/1D
NFL scouts rate UA players

LOCAL/1C
Legislature OKs bill to sue HMOs

Tucson Citizen

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First Edition

Residents split on national monument plan

By MITCH TOBIN
Citizen Staff Writer

You might think never having to worry about developers spoiling your view of a choice swatch of Sonoran Desert because your back yard is a national monument would have lots of appeal to homeowners.

But folks who live and work near the proposed Ironwood National Monument northwest of Tucson have mixed opinions on the county's efforts to persuade U.S. Interior Secretary Bruce Babbitt to recommend the monument be created.

Some say it would put the brakes on an unwanted housing boom endangering the solitude of the area, which teems with wildlife.

Others described it as an unnecessary land grab that could imperil livelihoods and limit access to the cactus- and ironwood-studded desert about 35 miles from downtown.

"We've already got enough monuments around here," said Brian Kuykendall, who works at the Silverbell copper mine, which would be nearly surrounded by the proposed monument.

"It could make it harder to do business," said Kuykendall, who also worried he would no longer be able to hunt birds and javelina in the national monument.

But Sandalee Moring, a court reporter who lives near the monument's proposed boundaries, called the plan to set aside up to 90,000 acres of state and federal land for the monument

RESIDENTS, continued/3A

■ **MONUMENT PLANS:** U.S. Interior Secretary Bruce Babbitt says he likes the idea of preserving Ironwood forests northwest of Tucson. But he's not promising a national monument. Page 1C

Cindy Coping and her husband, Bob, live within the proposed boundaries of Ironwood National Monument. The Copings say they fear grazing would be prohibited if the government makes their land a national monument.
NORMA JEAN GARGASZ/Tucson Citizen

Summer soak may follow dry spring

By DAVID J. CIESLAK
Citizen Staff Writer

While forecasters are expecting a warm, dry spring in Tucson, the approaching monsoon season could produce heavy rainfall and cool temperatures, meteorologists said.

"The chances are that it's favorable for an active monsoon," said Richard Okulski, a meteorologist with the National Weather Service.

As monsoon season approaches, lower temperatures will prevail, thanks to a weather system known as La Niña, he said.

"There's some correlation between La Niña and a

Turbulent skies

America West struggles with reputation for poor service

Stories by Lorrie Cohen

Tucsonans have a love-hate relationship with America West: It's the airline they seem to love to hate.

'They have a "We-don't-care" attitude, and I don't think they do care about Tucson passengers or the market here.'

Common complaints from Tucsonans include:

– Little non-stop service. Nearly all flights from

Sales tax boost for education proposed

The Associated Press

PHOENIX – Gov. Jane Hull and schools superintendent Lisa Graham Keegan are proposing a sales tax increase to pay for education improvements such as fixing substan-

"I'm not interested in being a part of that," said Sen. Ken Bennett, a Prescott Republican and a former president of the state Board of Education. "People are very interested in putting money in education as long as we get

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Residents split on county proposal to create Ironwood National Monument

Continued from Page 1A

"a wonderful idea . . . there's so much wildlife back there, it's phenomenal." Moring fears the state land in the area would eventually be sold to developers

A ranching couple who live on 37 acres in the proposed monument's boundaries hadn't heard about the proposal, which county officials pitched to Babbitt here yesterday. But they were suspicious of it.

"No one that's come up with the plan has stopped out here to talk to us about it," said Bob Coping, whose property is 13 miles off Avra Valley Road, down a serpentine dirt road

The Copings' nearest neighbor lives eight miles away. This is a place where cattle and desert bighorn sheep outnumber humans and where coyotes and mountain lions take down calves in the middle of the night.'

"The people who are the most affected have the least amount of say because there aren't many of us," added Cindy Coping

The Copings said they feared grazing would be prohibited if the federal government made their land into a national monument.

"It sounds anti-cattle to me," Cindy Coping said, noting that other ranchers have been hurt in "land grabs" by the federal government.

"I just don't trust the Clinton administration," she said.

But turning the land into a national monument might increase the number of law officers in a remote area that has its share of serious crimes, she said.

On Monday, the bodies of two men were found in a burned-out car a few miles from the Coping ranch. Sheriff's detectives believe the men, who were burned beyond recognition, were killed in a drug transaction

"This is a pretty convenient place to stick a body," Cindy Coping said

Creating a new monument might help business for Gary Perry, who runs the restaurant at the Valley Mart convenience store, at Avra Valley and Anway roads. Perry said he already gets some business from tourists who have lost their way heading to Saguaro National Park.

"I'm all for it because I think they've already ruined enough desert," Perry said. "I moved out here three years ago to get away from that."

Perry said 200 homes are being built down the road from the Valley Mart and the county can't keep up with road maintenance in the area.

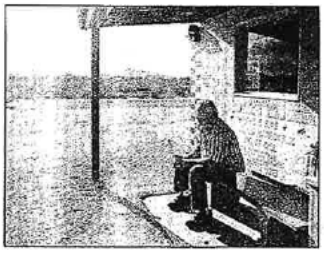
But David Huntley offered a different view. The retired ironworker, who has lived in the area since 1972, said the government should privatize its property and allow people to develop it.

"Too many people want to do nothing with it," he said while leaving Valley Mart. "They take your taxes to pay for state land and then tell you what you can do on it. That's wrong."

By the gas pump, Joseph Catalan gave the plan a thumbs up.

"I don't like this encroachment. There's too many houses and buildings going up," said the 24-year area resident. "I don't know where all these people are coming from. But they're coming."

Mitch Tobin's e-mail: mtobin@tucsoncitizen.com



Avra Valley resident Gary Perry said he favors the proposed Ironwood National Monument, to protect the land from big developers. NORMA JEAN GARGASZ/ Tucson Citizen

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Fifth-grader Cassandra Flores, above, is hard at work on a practice AIMS test at Ford Elementary School. At left, Rosie Delgado studies a preparatory booklet while her father, Charles Delgado, watches.

Benjie Sanders, The Arizona Daily Star

8A

third-grader at Holaway Elementary School, 3500 N. Cherry Ave.

"All these kids were screaming and some were falling off," he said last night. "My horse started running really fast, an started sliding off on the right side. I was trying to hold on

See STAMPEDE, Page 1

The Arizona Daily S

Jeffry Scott, The Arizona Daily St

Walking Winds Stables owner Lloyd Armour, amid the horses that spooked, injuring 12 children.

Babbitt's help sought to protect Pima ironwoods

By Joe Salkowski
The Arizona Daily Star

The Pima County Board of Supervisors is set to ask Interior Secretary Bruce Babbitt today to push for federal protection of up to 95,000 acres of ironwood-forested land on the county's northwest edge.

The proposed Ironwood National Monument would encompass federal and state land in the Silver Bell and Ragged Top mountains northwest of Tucson. It would preserve the county's thickest stand of ironwood trees, which provide critical habitat for the endangered pygmy owl and a variety of desert species.

"The land has great ecological value as well as archaeological value," said Board Chairwoman Sharon Bronson, a Democrat whose district includes the Silver Bell-Ragged Top area. "It's really just prime habitat."

Babbitt, a former Arizona governor and state attorney general, agreed to attend today's supervisors' meeting to discuss the county's Sonoran Desert Conservation Plan, which would safeguard 400,000 acres from development. The area of the proposed monument is targeted for protection in the plan.

The county has yet to complete a study designed to identify areas where preservation efforts would have the most ecological impact. But a recent study by the Arizona-Sonora Desert Museum highlights the importance of ironwood trees found in the Silver Bel Ragged Top area.

The area, which borders the Tohon O'odham Reservation on the west an the Pinal County line on the north, i also home to a number of ancient pet roglyphs and the remains of a Hohokan village.

Most of the land proposed for preser vation is owned by the federal Bureau o Land Management, while the rest

See IRONWOODS, Page 12

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"These affluent societies — Europe, Japan, North America —

The report found that Japan

Ironwoods

Continued from Page One

owned by the state. Some mineral mining has occurred on the land, but that would stop if the area were designated a national monument, Bronson said.

County staff has prepared two proposals for supervisors to consider. The first would ask Babbitt to press for protection of 96,000 acres in the Silver Bell-Ragged Top area as well as in the Waterman-Roskruge mountains. The second proposal would exclude the Waterman-Roskruge area and protect 73,600 acres.

County Manager Chuck Huckelberry said the proposal should be popular with area residents.

"They have actually requested special protection for that area, which was originally left out of the mountain park area," he said. "Our interest is parallel with theirs. We haven't heard any specific objection to this proposal."

FOIA001:01728005

Babbitt favors saving ironwood wonderland

By Joe Salkowski
The Arizona Daily Star

Interior Secretary Bruce Babbitt says the proposed Ironwood National Monument is a pristine desert wonderland worthy of long-term protection.

He should know: After hearing the Pima County Board of Supervisors make a pitch for the monument at its meeting yesterday, the former Arizona governor hiked to a high mountain pass in the area to take in the view for himself.

"It's a spectacular corner of the county," Babbitt said from a crest atop Ragged Top, a craggy peak about 30 miles northwest of Tucson.

Supervisors voted unanimously yesterday to call for federal protection of 96,000 acres of land encompassing the Silver Bell-Ragged Top range and the Waterman-Roskruge mountains.

Babbitt stopped short of endorsing their recommendation, saying he needs to study the land further. In particular, he said, he'd like to consider preserving existing copper mining operations west of the Silver Bell Mountains.

"An hour's hike is just the beginning of an inquiry into the history and meaning of this land," he said. "We've got a lot of work to do."

Babbitt said he didn't know much about the land before walking into yesterday's meeting, where he was told the area is home to Pima County's thickest stand of ironwood trees.

"Ironwood ecosystems provide habitat for more than 500 species of plants and animals," said Richard H. Daley, executive director of the Arizona-Sonora Desert Museum.

"Ironwood habitat is being fragmented badly, making the remaining major populations of ever-increasing significance," Daley told Babbit and the supervisors. "In some areas, up to 50 percent of the ironwood habitat is being damaged directly by development."

That isn't the case in the proposed preserve, a thick desert forest where ironwood trees mingle with saguaro cacti and palo verde trees. Mineral mining operations present the most immediate threat to vegetation in the area, Pima County Administrator Chuck Huckelberry said.

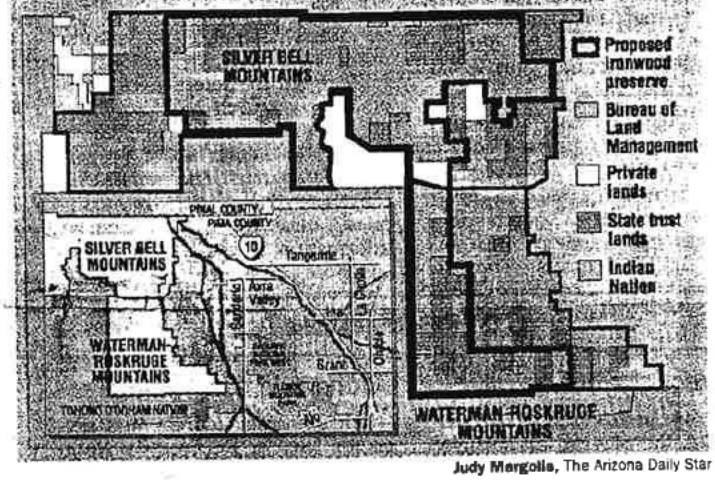
The area was targeted for protection by the county's Sonoran Desert Conservation Plan, which would safeguard 400,000 acres around the county from further development.

While most land in the area is fed-

See IRONWOOD, Page 7A

Proposed Ironwood National Monument

The Pima County Board of Supervisors asked Interior Secretary Bruce Babbitt yesterday to push for federal protection of 96,000 acres of mountainous land northwest of Tucson. The land is home to the county's thickest stand of ironwood trees, which provide critical habitat for the pygmy owl and other desert creatures.



Judy Margolis, The Arizona Daily Star

zona Daily Star
ıwood

st diabetes

ı of the Tohono O'odham Nation.
It's wiping us out," he said, noting that
dical complications following a diagno-
of diabetes hastened the deaths of his
ndmother, two aunts, an uncle and —
month — a niece.
n severe cases, diabetics suffer kidney
d need dialysis to cleanse their
toxic wastes. These cases can
heart problems and early death, or
t them limbs.
here are an estimated 250,000
erican Indian and Mexican Indian dia-

Christine Johnson, a Tohono O'odham, makes good, loud use of her gourd rattle as hikers and their friends dance to native music at the Arizona-Sonora Desert Museum. The walkers finished their 12-day, 230-mile trek there yesterday.

Joshua Trujillo

DOI-2021-08 00051

Tab 5

3.1.6.3 Migratory Birds

Various species of migratory birds summer, winter, and/or migrate through the IFNM. The habitat diversity provided by the broad expanses of Sonoran Desertscrub vegetation zones (including paloverde-cacti-mixed scrub, jojoba chaparral, creosote-white bursage, and xeroriparian communities) support numerous species of migratory birds. The most characteristic species include turkey vulture (*Cathartes aura*), northern harrier (*Circus cyaneus*), Cooper's hawk (*Accipiter cooperii*), white-winged dove (*Zenaida asiatica*), elf owl (*Micrathene whitneyi*), lesser nighthawk (*Chordeiles acutipennis*), black-chinned hummingbird (*Archilochus alexandri*), ash-throated flycatcher (*Myiarchus cinerascens*), purple martin (*Progne subis*), Bell's vireo (*Vireo atricapillus*), Lucy's warbler (*Vermivora luciae*), and sage sparrow (*Amphispiza belli*). Species such as killdeer (*Charadrius vociferous*), great blue heron (*Ardea herodias*), mallard (*Anas platyrhynchos*), and black-necked stilt (*Himantopus mexicanus*) may be found where suitable habitat exists.

3.1.7 Fire Ecology and Management

The BLM categorizes historic/natural fire regimes current for fire conditions in Arizona based on the results of a nationwide coarse-scale assessment and mapping effort (Schmidt et al. 2002; USGS 1999). In Arizona, BLM lands fall into four of the five identified historic/natural fire regimes, ranging from Category I (0 to 35 year frequency and low severity) to Category IV (35 to 100+ year frequency, stand replacement severity). The IFNM is characterized as a Category III historic/natural fire regime (i.e., having a 35- to 100-year frequency with a mixed severity of fires).

The current condition classes include Class 1 (i.e., lands where vegetation species, composition, and structure are intact and functioning within historic range), Class 2 (i.e., lands where fire size, frequency, intensity, severity, and/or landscape pattern and vegetation have been moderately modified), and Class 3 (i.e., lands where fire size, frequency, intensity, severity, and/or landscape pattern and vegetation have been significantly altered from historical range). All of the lands within the IFNM Decision and planning areas are designated as current condition Class 1. The BLM's Arizona Statewide Land Use Plan Amendment for Fire, Fuels and Air Quality Management provides general direction for fire management to meet statewide goals (USDI, BLM 2003a). Fuels treatments would occur on a case-by-case basis, generally in areas where treatments would be necessary for removal of invasive or exotic species.

3.1.8 Cultural Resources

Research in the Tucson vicinity and southern Arizona has outlined the cultural history of the region (Reid and Whittlesey 1997). Human occupation of the area can be separated into six periods that represent changing adaptations and lifeways. These include the Paleoindian (circa 12,000–8000 B.C.), Archaic (circa 8000–1500 B.C.), Late Archaic/Early Agricultural (circa 1500 B.C.–A.D. 650), Formative (circa A.D. 650–1400), Ethnohistoric (aboriginal protohistoric and historic, circa A.D. 1400–1950), and Euro-American historic (circa A.D. 1500–1950) eras.

Paleoindian occupation began at least as early as 12,000 B.C. during the late Pleistocene era when expansive ice sheets were retreating from the North American continent. Paleoindians hunted species that became extinct at the end of the Ice Age, such as mammoths. Although significant Paleoindian hunting sites have been found in southeastern Arizona, evidence of the Paleoindian era in the vicinity of the IFNM is limited to isolated spear points (Agenbroad 1967; Ayres 1970; Doelle 1985; Huckell 1984).

The subsequent Archaic era, beginning at approximately 8000 B.C., represents an adaptation based on hunting wild game and gathering indigenous plant foods within a climatic regime similar to modern conditions (Sayles 1983; Sayles and Antevs 1941).

Several Late Archaic/Early Agricultural era sites have been discovered along the course of the Santa Cruz River southeast of the IFNM (Gregory and Mabry 1998; Mabry et al. 1997). Late Archaic/Early Agricultural sites on the Santa Cruz River include some of the oldest canal systems and oldest pottery vessels found in southern Arizona (Gregory 1999; Heidke 1997; Heidke and Ferg 1998; Mabry 1999).

Sites of the Formative era dominate the regional archaeological record. These sites reflect an adaptation focused on farming villages, although wild game and indigenous plant foods continued to be exploited. Around A.D. 500, a culture known as the Hohokam began to flourish and occupied much of what is today southern and central Arizona for approximately a millennium. Marine shell jewelry, obsidian flaked stone artifacts, turquoise, copper bells, and macaws indicate the Hohokam traveled well beyond their core area of settlement or traded with groups in surrounding areas.

The current condition of cultural resources is characterized by discussing three indicators: (1) inventory and evaluation, (2) threats to the historical integrity of resources and responses to those threats, and (3) public and professional interpretation of cultural resources.

3.1.8.1 Extent of Inventory and Evaluation

Cultural resource survey is labor intensive and costly, and simple inventory and evaluation is a major challenge for managing cultural resources. Archaeological sites reflecting both prehistoric and historic-era occupation of the region are abundant, and the sites that have been recorded represent only a small percentage of the cultural resources within the IFNM. Twenty-one documented surveys have, in the aggregate, inventoried approximately 21,194 acres (33.1 square miles) for cultural resources within the IFNM (Table 3-7). (Approximately 30 additional cultural investigations have been conducted in the IFNM, but are not well documented.) The surveys encompass about 12 percent of the public land and about 9 percent of the nonpublic lands within the IFNM.

Table 3-7: Summary of Cultural Resource Inventory Data

	State and Private Lands	Federal Public Lands (Surface Estate)	Planning Area (Entire IFNM)
Size (acres)	60,221	128,398	188,619
Size (square miles)	94	201	295
Surveyed for cultural resources (acres)	5,622	15,572	21,194
Surveyed for cultural resources (square miles)	8.8	24.3	33.1
Percentage surveyed	9.3%	12.1%	11.2%
Recorded cultural resources	64	279	343
Density (sites/square mile)	7	11	10
Projected number of resources	700	2,300	3,000

SOURCES: AZSITE 2003; Dart and Gibson 1988; Gibson 1987a, 1987b; Heilen 2004; U.S. Department of the Interior, Bureau of Land Management 2004a

NOTE: Numerous errors regarding site jurisdiction were noted in the AZSITE database. Jurisdiction was determined by overlaying a current geographic information system jurisdictional map onto the site locations. If any part of a site was on public land, it was treated as being within the decision area. BLM has no authority or responsibility to manage cultural resources on State Trust and private lands within IFNM.

The various surveys within the IFNM have recorded a total of 343 archaeological and historical sites. More than 80 percent of the recorded sites (279) are on BLM surface estate, and the other are on State Trust land (61) and private lands. The average density is about 11 sites per square mile on public land and about 7 sites per square mile on State and private land. The survey data suggest there could be approximately 3,000 sites within the IFNM (with about 2,300 on the BLM surface estate. The University of Arizona recently completed a more statistically rigorous sample survey that indicates that there could be about twice that many sites within the IFNM (Heilen and Reid 2006). The survey also recorded almost

3,400 isolated finds indicating that there could be on the order of 125,000 isolated artifacts and features within the IFNM.

About 89 percent of the 343 sites recorded within the IFNM reflect the aboriginal occupation of the region, and about 7 percent reflect historical Euro-American occupation. About 3 percent of the sites have both aboriginal and Euro-American components, and the cultural and temporal affiliations of the remaining sites are unknown.

The only possible evidence of Paleoindian occupation identified in the IFNM is a broken spear point found on sites with Archaic and Hohokam components. Five recorded sites have been identified as dating to the Archaic era and 19 other Archaic components have been recognized on other multicomponent sites.

Evidence of the Hohokam occupation of the region dominates the archaeological record of the IFNM; 201 of the recorded sties have been classified as Hohokam or probably Hohokam sites, and 34 other Hohokam components have been recorded at multicomponent sites. The cultural affiliations of 63 other recorded sites and 2 components at sites with historical Euro-American components have been classified as reflecting unidentified prehistoric occupation. Nine sites have been classified as reflecting protohistoric or historic period O'odham use of the IFNM, and 13 other O'odham components have been identified at multicomponent sites. Two components at sites with O'odham components have been tentatively identified as possibly reflecting affiliations with the Patayan culture, which was centered along the lower Colorado River west of the Hohokam territory, and a possible Apache component has been recorded on a Hohokam site.

About 25 to 30 of the sites recorded in the IFNM appear to represent Hohokam habitation sites, ranging from small farmsteads to large villages. Features noted at these sites include trash mounds, roasting pits, rock piles, rock alignments, and petroglyphs (rock art), along with numerous artifacts. A focus of Hohokam habitation that overlaps the northeastern corner of the IFNM has been designated as the Los Robles Archaeological District. About 130 archaeological sites have been recorded within the 20.7-square-mile district. Many of the sites within the district are on State Trust land, including the large villages known as Cerro Prieto and Pan Quemado. The Los Robles platform mound site at the core of the district also in on State Trust land north of the IFNM. Twenty-one of the significant sites within the Los Robles Archaeological District are located on BLM surface estate.

Another Hohokam habitation focus has been designated as the Cocoraque Butte Archaeological District. There are at least two Hohokam habitation sites and many petroglyphs in the district, which encompasses two large buttes, three smaller hills, and the surrounding flats on public and private land in the southeastern part of the IFNM.

Most of the other aboriginal sites appear to reflect seasonal habitation or camps, or temporary work locations where activities such as collection and processing of indigenous resources (such as cactus fruits) were pursued. These sites consist of scatters of artifacts such as broken pottery and pieces of flaked and ground stone. About one-third of the artifact scatters have archaeological features of various types, such as roasting pits, rock piles, rock alignments, clearings, check dams, petroglyphs, stone tool quarries, and bedrock grinding stones. About 45 of the recorded sites have petroglyphs.

A unique historic-period site is the Santa Ana de Cuiquiburitac Mission, which was the location of a *visita* (chapel served by a visiting priest) built in 1810-1811. The building is no longer extant, but artifacts and features are scattered across the site, which also has an O'odham component.

Twenty-four historic-period sites have been classified as having or probably having Euro-American affiliations. These sites include the Silver Bell Cemetery and the alignment of an abandoned railroad that

served the mining town of Silver Bell, located in the Silver Bell Mountains just outside the IFNM. Other Euro-American sites include a gravesite, a camp, three mining prospects, a road segment, and trash scatters. Two minimally recorded sites have yielded no clues about their cultural affiliations.

There is limited information pertaining to specific places within the IFNM identified as having traditional cultural significance, but an inventory study has not been conducted. Tribes with traditional cultural affiliations with the region are known to have concerns about treatment of human remains, funerary objects, sacred objects, and objects of cultural patrimony that are sometimes present within archaeological sites. Members of the Tohono O'odham Nation, which borders the IFNM, also might consider some places within the IFNM that were used traditionally, such as stands of saguaro where fruit was collected, as having cultural significance (Nabhan 1987, 1982). The Cocoraque Butte area is also known to have some significance as a traditional cultural place. BLM plans to work closely with the Tohono O'odham Nation and other concerned tribes to implement cultural resource management that accounts for the extensive historic use of the area by local tribes, and that acknowledges tribal knowledge of and concern for the cultural resources of the IFNM. Additional discussion of tribal interests is provided in Section 3.4.

Prior to the designation of the IFNM, which provides recognition and a measure of protection for all of the cultural resources within the IFNM, three historic properties had been recognized as having special significance by being listed in the National Register of Historic Places (Table 3-8). These include the Los Robles Archaeological District, Cocoraque Butte Archaeological District, and the Santa Ana de Cuiquiburitac Mission Site. The transfer of cultural resources eligible for the National Register is, by regulatory definition, an "adverse effect." BLM approval of the land exchange implies that overall it resulted in public benefits. In 1986, the Arizona State Legislature authorized development of a state park to preserve and publicly interpret the Los Robles Archaeological District, but development of the park was not pursued and it was declassified as a state park in 1988.

Table 3-8: National Register Status of Cultural Resources Recorded within the IFNM

National Register Status	Total Sites	%	Owner			
			BLM	%	Private/ State	%
Properties listed						
Los Robles Archaeological District						
Sites within IFNM identified as contributing properties	53	15%	21	40%	32	60%
Sites within IFNM identified as noncontributing properties	4	1%		0%	4	100%
Sites within IFNM not identified in nomination	1	<1%		0%	1	100%
Subtotal of sites within Los Robles Archaeological District in IFNM[1]	59	17%	21	36%	38	64%
Cocoraque Butte Archaeological District	1	<1%	1	100%		0%
Santa Ana de Cuiquiburitac Mission Site	1	<1%	1	100%		0%
Recommended eligible	175	51%	175	100%		0%
Recommended ineligible	22	6%	22	100%		0%
Unknown or unevaluated	86	25%	59	69%	27	31%
Totals	343	100%	279	81%	64	19%

SOURCES: AZSITE 2003; Dart and Gibson 1988; Gibson 1987a, 1987b; Heilen 2004; U.S. Department of the Interior, Bureau of Land Management 2004a

NOTE: [1] The Los Robles Survey assigned a total of 158 sites numbers. Some of these were combined when site numbers were assigned in the Arizona State Museum survey system. A total of 119 sites with Arizona State Museum numbers are classified as contributing sites in the Los Robles District, and 10 as noncontributing sites. Approximately 45 percent of the sites within the listed district are within IFNM.

The recorders of 175 other sites have recommended that they be considered eligible for the National Register, and 22 sites have been evaluated as ineligible. The eligibility of the remaining sites within the IFNM has not been evaluated.

Subsequent to the issuance of the draft EIS, two surveys inventoried cultural resources along 126.25 miles of selected roads within and adjacent to the INFM (Fischler and French 2007; Whitney and others 2008). The surveys covered 30-foot-wide corridors along approximately 111.5 miles of roadways on Federal public land managed by BLM within the IFNM, 7 miles of roadways on State Trust land within the IFNM, and 7.75 miles on Arizona State Trust land adjacent to the IFNM. With the completion of those surveys, all but about 15 miles that the proposed Alternative C designates as remaining open for motorized use have been inventoried for cultural resources.

The surveys found 10 previously recorded sites and discovered 80 other archaeological and historical sites (Table 3-9). (Thirty-five of the other previously recorded archaeological and historical sites are located along 21.4 miles of roads covered by prior surveys on public land within the INFM.) Fifty-seven of the discovered sites were along roads on public land managed by BLM within the IFNM. Nine of the sites are on State Trust land within the IFNM, and the other 14 sites are on State Trust land adjacent to the IFNM.

Table 3-9: Summary of Supplemental Cultural Resource Road Surveys

	Federal Public Land	State Land within IFNM	State Land adjacent to IFNM	Totals
Extent of Supplemental Survey				
Miles surveyed within IFNM	111.5	7.0	7.75	126.25
Sites Discovered				
Archaic	2	0	0	2
Hohokam artifact scatter	19	5	6	30
Hohokam habitation	3	0	3	6
Prehistoric (unidentified period)	9	0	3	12
Historical O'odham	11	1	0	12
Historical Euro American	10	2	0	12
Prehistoric/Historic	3	1	2	6
Total Sites Discovered	57	9	14	80
National Register of Historic Places Evaluations				
Recommended eligible	50	9	14	73
Recommended potentially eligible	5	0	0	5
Recommended not eligible	2	0	0	2

The discovered sites were similar to those previously recorded on the IFNM. Fifty of the sites reflect prehistoric occupation of the area. Twelve of those could not be more precisely dated, but 2 were identified as dating to the Archaic period and 36 to the Hohokam period. Twelve sites were identified as historical Tohono O'odham sites, and 12 were identified as historical Euro-American sites. Six sites had both prehistoric and historical components.

Most of the prehistoric sites seem to reflect seasonal camps or temporary use locations, but six sites appear to be remnants of permanently occupied Hohokam habitations. The historical sites include trash dumps, camps, windmills, cairns, mine shafts and prospects, and other features associated with mining and ranching activities.

The BLM has not formally evaluated the National Register eligibility of the 80 discovered sites, but the recorders evaluated 73 of them as having potential to yield important information and recommended that they be considered eligible for the National Register under Criterion D. The recorders recommended that five of the historical Euro-American sites be considered potentially eligible pending the results of further

archival research, and they also concluded that two historical trash dumps had no values that warrant preservation, and recommended that they be considered ineligible for the National Register.

3.1.8.2 Extent of and Responses to Threats

Three factors threaten the integrity of cultural resources, including (1) disturbance or destruction by various types of development projects or land uses (including travel by undocumented immigrants and smugglers), (2) natural erosion, and (3) unauthorized excavating and artifact collecting by vandals or uninformed recreational users.

Review of potential impacts on cultural resources due to authorized uses of public land within what is now the IFNM began in the 1970s in response to the passage of the National Historic Preservation Act. Prior to that time, the most substantial use of the area was related to livestock grazing and prospecting and the most substantial impacts on cultural resources probably were due to development of roads. Projects or land uses reviewed since the 1970s have included electrical transmission lines, microwave communication sites, roads, mineral exploration, range improvements (such as fences, cattle guards, waterlines, and reseeding projects), and an ultralight airfield. The only approved project that has resulted in an adverse effect on cultural resources in the vicinity of IFNM was a land exchange with ASARCO for expansion of the Silver Bell Mine. Three prehistoric and eight historical sites immediately adjacent to IFNM were studied before they were transferred from Federal ownership (Slawson and Ayres 1994, 1992). Two sites on the National Register have sustained notable damage over the last few years. Petroglyphs within the Los Robles Archeological District on BLM land have been vandalized and defaced by imposter (new) petroglyphs. Other sites on State Trust land within the District have also been extensively damaged. BLM regularly monitors this site. The Santa Ana de Cuiquiburitac Mission site was damaged by the creation of an unauthorized immigration route through the foundation of the chapel. In collaboration with the Tohono O'odham Nation, BLM has placed a barrier of approximately 35 boulders around the chapel foundation to prevent vehicular travel across the site. This barrier has proven to be an effective protection measure. Both the BLM and Tohono O’odham Nation currently monitor the site. Additionally, BLM and the Tohono O'odham Nation intensively mapped the site and surface features as part of the stabilization process.

There are only meager data regarding the extent to which erosion is threatening the historic integrity of cultural resources within the IFNM. Responses to the threats of erosion include stabilization and restoration.

Unauthorized collection of cultural materials by persons uninformed of cultural resource protection laws and intentional vandalism, such as target shooting and graffiti, are the most serious threats to cultural resources on public land within the IFNM. However, there is little quantitative data about the extent of the problem. Current responses to the threat of vandalism include site monitoring, reconnaissance, and law enforcement. BLM cooperates with the State Historic Preservation Office in supporting a statewide site-steward program. Volunteers regularly monitor selected sites and report vandalism or other damage to appropriate land managing agencies. This has been one of the most successful strategies for protecting cultural resources on public land. The Tucson Field Office currently is working with approximately six volunteer site stewards and a local landowner who monitor archaeological sites within the IFNM. Sites are monitored throughout the IFNM with a special focus on the Los Robles and Cocoraque Butte Archaeological Districts and Silver Bell Cemetery. When vandal excavations and damaged or stolen cultural materials are noted, they are reported to BLM rangers for follow-up investigations.

Other protection measures include placing signs at sites to inform visitors of laws protecting cultural resources and penalties for unauthorized collection and excavation. The only signs, fences, and gates installed to protect cultural resources within the IFNM are in the vicinity of the Cocoraque Butte Archaeological District; but installation of signs to protect other sites is planned. Administrative measures

such as road closures or special management designations also can be used to protect cultural resources. Roads have been closed at Cocoraque Butte, but these closures have been difficult to enforce.

3.1.8.3 Interpretation of Cultural Resources

The primary motivation for protecting and preserving cultural resources is to enhance public and professional interpretation and appreciation of our cultural heritage. Public interpretation within the IFNM has been limited primarily to occasional guided tours of Hohokam petroglyph sites. Future opportunities for public interpretation include heritage publications, other media products, interpretive signs and kiosks, and visitor centers.

Professional interpretation of cultural resources within the IFNM has been more intensive. The IFNM has been used as an "outdoor laboratory" for training student and avocational archaeologists. University of Arizona faculty and students have conducted two major research investigations of archaeological resources within IFNM. One of these studies involved an extensive survey that documented the Hohokam Los Robles platform mound community and the Cerro Prieto trincheras site, and resulted in the listing of the Los Robles Archaeological District in the National Register (Downum 1993). The second study was a University of Arizona research project that surveyed 5,186 acres in sample parcels distributed throughout the IFNM in order to better understand the distribution of archaeological resources within the IFNM (Heilen 2005; Heilen and Reid 2006). The survey doubled the number of recorded sites within the IFNM. The third study involved an evaluation of the Santa Ana de Cuiquiburitac visita site (Reid and Heilen 2005).

3.1.9 Paleontological Resources

Paleontological resources constitute a fragile and nonrenewable scientific record of the history of life on earth. Once damaged, destroyed, or improperly collected, the scientific and educational values of these resources are reduced greatly or lost forever. In addition to their scientific, educational, and recreational values, paleontological resources can be used to understand interrelationships between the biological and geological components of ecosystems over long periods of time.

The fossils found on public lands are considered part of our national heritage and are therefore afforded protection. Vertebrate fossils or other noteworthy occurrences of invertebrate and plant fossils are considered significant by the BLM. Invertebrate and plant fossils are typically more abundant, and therefore, the BLM does not ordinarily consider them to be of significance.

Areas containing vertebrate fossils or noteworthy occurrences of invertebrate or plant fossils are managed under one of four management classes:

> ***Class 1 (low sensitivity)***: Igneous and metamorphic geologic units and sedimentary geologic units where vertebrate fossils or uncommon nonvertebrate fossils are unlikely to occur
>
> ***Class 2 (moderate sensitivity)***: Sedimentary geologic units that are known to contain or have unknown potential to contain fossils that vary in significance, abundance, and predictable occurrence
>
> ***Class 3 (moderate sensitivity)***: Areas where geologic units are known to contain fossils but have little or no risk of human-caused adverse impacts and/or low risk of natural degradation
>
> ***Class 4 (high sensitivity)***: Areas where geologic units regularly and predictably contain vertebrate fossils and/or uncommon nonvertebrate fossils, and are at risk of natural degradation and/or human-caused adverse impacts

The IFNM is mainly Class 1 and Class 2, though there are a few Class 3 areas. Acres within each management class are summarized in Table 3-10.

Table 3-10: Classification of Lands within the IFNM for Fossil Sensitivity

Management Class	Approximate acres within the Planning Area	Approximate acres administered by BLM
Class 1	62,610	43,800
Class 2	107,050	71,630
Class 3	20,040	12,970

SOURCE: U.S. Department of the Interior, Bureau of Land Management 2005

Paleontological resources in southern Arizona are typically found in the Quaternary deposits. There are a few limited known occurrences of paleontological resources on the IFNM; however, no significant fossils are known to occur within the monument. Several neotoma (packrat) middens located in late Pleistocene and subrecent deposits have yielded various animal and plant species in the Wolcott Peak area of the IFNM (USDI, BLM 1980a). Vertebrate fossils in southern Arizona include remnants of early horses, elephants, dogs, gomphotheres, camels, mammoths, llamas, birds, fish, beavers, rats, foxes, weasels, squirrels, lizards, snakes, chipmunks, mice, gophers, tortoises, bats, marmots, wolves, bears, badgers, skunks, ground sloths, woodchucks, cats, donkeys, rhinoceros, peccaries, deer, elk, and bison. These are typically found in the unconsolidated silt, sand, and gravel deposits of the Quaternary (Holocene and Pleistocene), as well as the Tertiary sedimentary units. Some of these have been discovered during major earth-moving activities, such as during highway and building construction projects. Others have been discovered as ongoing erosional processes expose fossil remnants (Ratkevich 1993; Scarborough 2003; USDI, BLM 1980a). Some of the Jurassic-aged sedimentary units in southern Arizona have yielded fragments of dinosaur (believed to be tritylodontid) and crocodile (McCord and Tegowski 1996). Some Cretaceous-aged dinosaurs (stegosaurian or archosaurian) have been found in the Comobabi Mountains to the west of Tucson (McCord and Tegowski 1996). These older fossils are not abundant, but they may occur in some geologic units in the planning area. Mammal tracks have been reported in Tertiary volcanic sedimentary rocks in the Sawtooth Mountains (Scarborough 2002).

Various invertebrate fossils have been noted in southern Arizona and include corals, brachiopods, gastropods, foraminifera, holothurians, ostracods, bryozoans, crinoids, trilobites, cephalopods, pelecypods, echinoids, blastoids, and others.

The BLM has developed objectives for paleontological resources (BLM Manual H-8270-1, General Procedural Guidance for Paleontological Resource Management) to provide protection of the resources. It is the policy of BLM to manage paleontological resources for these values and to mitigate adverse impacts on them.

3.1.10 Visual Resources

The IFNM is a landscape of contrasts. Its broad, flat valleys are interrupted by rugged, steep-sloped mountains, and punctuated by isolated hills. The gently sloping bajadas that soften the transitions between jagged mountain and valley floor are dissected by dry, desert washes that nevertheless support a variety of colors. A variation of green-hued vegetation is found in abundance, and the reds and yellows of native flowers appear in their seasons. The richness of the ecosystem is manifest in the sometimes dramatic, sometimes subtle variations in colors and textures that cover, yet fail to obscure, the striking landforms that hint at the geological processes that formed this southwestern region of the United States. The sculptural forms of Sonoran Desert cacti add an almost museum quality to some of the landscapes within the IFNM.

Tab 6

2

Silverbell

Areas of Scientific & Historic Interests

Prepared by:

Tucson Field Office

April 27,2000

SETTING

The Silverbell Resource Conservation Area is a unique, scenic area of rolling desert and Ironwood woodlands around the Silverbell, Waterman and Roskruge mountains. Located along the Tohono Reservation boundary, within an hour of the rapidly growing Tucson metropolitan area, the Resource Conservation Area offers outstanding dispersed recreation opportunities but is also highly vulnerable to the impacts of growth. In addition to Tucson, the area is readily accessible from the Phoenix Metropolitan area. Access into the area is provided by dirt roads connecting with Interstate Highway10.

Much of the vegetation in this area is classic Sonoran desert upland habitat dominated by cactus; saguaro, Bigelow's cholla, and staghorn cholla. Common plants include; ironwood, palo verde, creosote, brittle-bush, triangle-leaf bursage, ocotillo, and thornbush. The upper slopes of the Silver bell Mountains possess a chaparral community dominated by jojoba. The lower bajadas contain inter-braided stream beds which carry water after heavy rains. These desert wash habitats are characterized by large ironwood, blue paloverde, and saguaro.

The resource conservation area encompasses most of the mountain ranges that are important to the diverse wildlife and plant communities associated with the saguaro/ironwood forest.. In addition, the resource conservation area contains habitat for several endangered species, a site on the National Register of Historic Places, an archaeological district on the National Register of Historic Places, an ACEC to protect an endangered cactus, a Desert Bighorn Sheep special management area, Desert Tortoise habitat, Historic mining camps and scenic open space.

The resource conservation area encompasses 150,114 acres in southeast Arizona roughly bounded by the Santa Cruz river valley on the north and east, Tohono Reservation on the west and on the south.

AREAS OF PREHISTORIC INTEREST

Name: **Areas Of Prehistoric Interest**

Description: Although only a portion the land administered by the BLM in the proposed Ironwood Preserve area has been inventoried for cultural resources, enough documentation has been accomplished to provide a general idea about what types of cultural properties are located there. Stone tools found along ancient gravel shoals, which seem to be situated over intermittent, subterranean streams, indicate that Archaic hunter/gatherers roamed the area at least 4,000 years ago. Later prehistoric cultures, including the Hohokam, Trincheras, and Tohono O'odham, are represented at several hundred recorded sites in the area. Valuable scientific information could be learned about the use of water by these ancient cultures, and about their relationship with the desert environment. Numerous historic sites, mostly associated with silver and copper mining during the late 1800's and early 1900's, are located in the area. These historic sites represent an important aspect concerning the industrial development of southeast Arizona. All the information associated with both the prehistoric and historic cultural properties in the proposed preserve area is important in terms of its humanistic and scientific value to the people of the United States.

Location: Silverbell RCA

Significance: National

Source: Urban and Mayro, BLM files

Name: **Cocoraque Butte Archaeological District**

Description: The Cocoraque Butte Archaeological District was listed on the National Register of Historic Places on October 10, 1975. This district is composed of 480 acres of public land administered by the BLM, which are located in the proposed preserve area. Widely known and studied for the numerous petroglyphs (rock art) located on the granite boulders composing the butte formation, this archaeological district includes an adjacent, moderately extensive Hohokam village site.

The rock art at this site is of special merit because of its wide variety of prehistoric, decorative motifs and the evidently long time period during which it was created. Increased destruction of southern Arizona rock are sites through land modification projects, vandalism and theft enhances the value of sites like Cocoraque Butte. The village at this site contains archaeological materials which could provide important information about how the Hohokam adapted their technology and social structure to the desert foothill regions of southeast Arizona. Valuable information about the environment, climate and weather that existed during the time that the Hohokam occupied this site could, at sometime in the future, be recovered through systematic, scientific investigation. Some of the rock art at this site may date back to the Archaic Period, from roughly 6000 B.C. to around A.D. 250. Most of the designs and motifs are characteristic of the

Hohokam culture and date to between A.D. 500 to A.D. 1450.

Also, a significant quantity of rock art is located on a 160 acre parcel of privately owned land adjacent to the Cocoraque Butte Archaeological District. This land is part of an historic ranch owned for several generations by the same family. The owner has been very protective of the rock art there. Consequently, it has been protected against vandalism and theft and most of it is in a state of excellent preservation.

Location: Silverbell RCA
Significance: National
Source: Urban and Mayro, BLM files

Name: **Los Robles Archaeological District**
Description: The Los Robles Archaeological District was placed on the National Register of Historic Places on May 11, 1989. It encompasses 12,89 acres of land, most of which are located in Pinal County, Arizona, north of the proposed preserve area boundary. Approximately 1,920 acres of public land administered by the BLM are included in this archaeological district. Approximately 6,500 acres are owned by the state of Arizona and the remainder is privately owned. The district is named for Los Robles Wash, which runs along its eastern edge. It encompasses the northern prominences of the Samaniego Hills, including two volcanic formations known as Cerro Prieto and Pan Quemado. Highly significant prehistoric archaeological sites are located at each formation, primarily on State Trust and privately owned land.

Cerro Prieto rises some 700 feet above the surrounding desert valley floor and is believed by archaeologists to have been an important focal location for prehistoric habitation and perhaps as a defensive refuge. The archaeological site here is a large, complex, hillside "Trincheras" village which includes more that 250 masonry rooms and numerous stone compounds, terraces, walls and other features. Archaeological materials and features at Cerro Prieto indicate that this hillside settlement was occupied sometime between A.D. 1100 to A.D. 1300, which is roughly synonymous with the Hohokam Classic Period, A.D.1100 to A.D. 1450. Exactly how the Trincheras people might have related to the neighboring Hohokam in the near-by Los Robles community is the subject of current archaeological inquiry and debate. One of the central questions in this inquiry is whether the Trincheras people represented a separate and distinct culture from the Hohokam or were simply a variant of the Hohokam culture. Although a number of Trincheras sites have been documented in southeast Arizona, and the Tucson area, they are most abundant in northern Sonora along the Altar and Magdalena rivers. The question about how they relate to the Cerro Prieto has yet to be answered.

Pan Quemado, along with the bedrock outcrops and volcanic hills in the Ragged Top and Silver Bell Mountains, is unusual for the amount, variety and complexity of prehistoric rock that has found along its slopes. Some may date back to the Archaic Period, while most seems to be characteristic of the Hohokam and is most probably associated with the Los Robles Hohokam community.

Location: Los Robles Archaeological District, North East end of Silverbell RCA
Significance: National
Source: Urban and Mayro BLM files

Name: **Robles Platform Mound Community**
Description: The Robles Platform Mound Community is located approximately one and one-half (1 ½) miles southeast or Pan Quemado. It is in Pima County, on Arizona State Trust Land adjacent to public land administered by the BLM, and is inside the proposed preserve area. This site includes an earthen platform mound, constructed during the Hohokam Classic period, which rises six to eight feet above the surrounding desert floor. It is surrounded by partly buried trash mounds. The probability is high that adobe walls and pit house remains are buried in the ground surrounding the mound. The possible relation between this mound and community with the Trincheras at Cerro Prieto and the local Hohokam is the subject of intense interest within the archaeological community.

Location: Los Robles Archaeological District, North East end of Silverbell RCA
Significance: National
Source: Urban and Mayro BLM files,

AREAS OF HISTORIC INTEREST

Name: **Silver Bell Mining District**
Description: Most of the historic cultural sites located within the proposed preserve area are associated with the Silver Bell Mining District. Exactly when the first mining operation opened in this district is not known. Unsubstantiated information holds that the first operation began in 1865 at the Old Boot Mine. The first, recorded claim at this location was made by E.O. Shaw and Edward N. Fish in 1879. Historic records show that the first mine was put into operation in 1873, by Charles O. Brown, representatives of Tully, Ochoa & Company, and E.M. Pearce, who formed a partnership and sank a shaft on the Mammoth lode at the Old Boot Mine and began to recover native copper with good silver values. By the end of 1874, the Young America Mine in the Silver Mountain Mining District, located six miles southeast of the Old Boot Mine, was sufficiently productive to justify the construction of a small smelter. Today, slag deposits and wall foundations that can be seen along the county road near ASARCO's Silver Bell Unit may be the remains of this smelter.

Fluctuations in the price of copper during the following decades determined the level of production and success of mining ventures in the Silver Bell Mining District. During the 1880's several new mines opened and numerous mining camps evolved into life.

Between 1988 and 1991, a Class III cultural resources inventory was conducted over 4,448 acres of public land administered by the BLM in the Silver Bell Mining District in preparation for a land exchange between ASARCO and the BLM. A total of twenty-three sites were recorded. Data recovery was carried out at historic and prehistoric sites determined eligible for listing on the National Register of Historic Places.

Historic sites located outside the ASARCO exchange land, but inside the proposed preserve area include the Silver Bell Cemetery and several small, mining camps represented as tin can and glass scatters. Several isolated historic graves have also been reported.

Location: Southwest side of the Silver Bell Mountains
Significance: Regional
Source: BLM files

Name: **Silver Bell Cemetery**
Description: The Silver Bell Cemetery is located on public land administered by the BLM within the proposed preserve area. About thirty graves, dating from around 1880 to 1930, are located in the cemetery. Several isolated historic graves have also been found in the area.
Location: Northwest side of the Silver Bell Mountains
Significance: Regional
Source: BLM files

Name: **Arizona Southern Railroad**
Description: The Arizona Southern Railroad began hauling copper and silver ore between the towns of Silver Bell and Red Rock in 1904. Initially the ore was hauled to a smelter in Douglas, Arizona. However, by 1907, enough ore was being produced in the Silver Bell Mining District to make it economically viable for the Southern Arizona Smelting Company (SASCO) to build a smelter, where the town of Sasco was located. The railroad tracks and the smelter were dismantled in 1933. Today, the railroad bed is used as a road and is maintained by Pima County.
Location: North end of the Silver Bell Mountains
Significance: Regional
Source: BLM files

AREAS OF GEOLOGIC INTEREST

Name: **Silver Bell Mining District**

Description: The Silver Bell Mining District contains porphyry copper mineral deposits. These deposits are typical in that they are associated with intrusions of quartz monzonite porphyry and they consist of disseminated chalcopyrite, an enriched zone of chalcocite, and an overlying zone of copper oxide.

Mining dates back to 1873. Open pit mining began in 1954 and was discontinued in 1984, after which leaching of dump material continued. Open pit mining from two deposits, El Tiro and Oxide, yielded 83.5 million metric tons of ore from 1954 to 1984 averaging 0.76% copper and 0.55 grams per metric ton silver. ASARCO began mining the Silver Bell North deposit in July, 1997. This deposit was reported in 1990 to have 185 million metric tons averaging 0.61% copper. ASARCO produces 16,000 metric tons of copper annually from oxide ore from the new pit as well as some leaching in the El Tiro and Oxide pits. Copper cathode is produced in a new solvent extraction - electro winning plant.

Location: Southwest side of the Silver Bell Mountains

Significance: Regional

Source: Arizona Department of Mines and Mineral Resources - Arizona's Mining Update - 1998 (http://www.admmr.state.az.us/minupdat.htm).

Name: **Ragged Top Peak**

Description: Ragged Top is the eroded remnant of a volcanic rhyolite dome of Oligocene age extruded along the Ragged Top fault. Erosion of this resistant rock has created spectacular spires, domes and pinnacles. Ragged Top is a familiar landmark in the Silver Bell Mountains.

Location: North side of Silver Bell Mountains

Significance: local

Source: Nowlan, G.A., Peterson, J.A., Pitkin, J.A., Hanna, W.F., Kreidler, T.J., 1989, Mineral resources of the Ragged Top wilderness area, U.S. Geological Survey Bulletin 1702-H, 22 pp.

AREAS OF BIOLOGICAL INTEREST

Name: **Sensitive Wildlife Species**

Description: The diversity of vegetative communities and topographical features provide habitat for a diversity of sensitive wildlife species including

Location: throughout entire RCA

Significance: Statewide

Source: BLM Files; Arizona Game and Fish Department.

Diversity of Avian Species

The Sonoran desert contains a diverse avian community. Gila wood pecker, common flickers, and ladder-backed woodpeckers create cavities in ironwood, palo verde, saguaro, and mesquite Elf owl, screech owl, kestrel, ash-throated flycatcher, and pygmy owl (mentioned above) take advantage of these cavities once they are abandoned by their original occupant. Other desert species include roadrunner, cactus wren, curve-billed thrasher, verdin, Bullock's oriole, pyrrhuloxia, black-throated sparrow, Gambel's quail, white-winged dove, Harris hawk, red-tailed hawk, Cooper's hawk, and loggerhead shrike. As urban sprawl advances other species; house sparrow, common grackle, starling, and cowbird (which benefit from human modification of habitat); move into desert habitats and usurp niches occupied by native species.

Name: **Cactus ferruginous pygmy owl:**

Description: The cactus ferruginous pygmy owl feeds on small mammals, birds, lizards, and insects. Its preferred habitat is the Sonoran desert where shrub vegetation is dense and saguaro, ironwood and paloverde offer cavities for nesting. This small owl has recently been listed as endangered by US Fish and Wildlife Service. The area is not listed as critical habitat however suitable habitat is present in desert washes where large ironwoods and saguaros are present in abundance. This species is primarily endangered due to loss and degradation of habitat.:

Location: Saguaro/Ironwood/Palo Verde vegetation association

Significance: National

Source

Name: **Peregrine falcon**:

Description Recently removed from the endangered species list, this raptor has been observed during nesting season in the area, preying on swallows and swifts. Inaccessible cliffs are preferred as nesting habitat.

Location: Ragged Top

Significance: National

Source:

Name: **Diversity of Mammals**

Description: A number of mammal species occur in the area. The largest predator is the mountain lion. Bobcat, grey fox, and ring-tailed cat occur in the more rugged areas with dense vegetation. Kit fox occur on open deserts flats and bajadas. Coyote, the one predator which is well adapted to humans, is common throughout. Desert mule deer are relatively scarce but can be found. Collared peccary (or javelina) occur in family groups usually in association with prickly pear cactus, their favored forage plant. A myriad of small rodents and rabbits provide the forage base for hawks, owls, snakes, and other predators previously mentioned.

Location: US and Mexico.

Significance: National
Source: Hoffmeister, Donald Frederick: Mammals of Arizona. University of Arizona Press, Arizona Game and Fish Department, Tucson.

Name: **Bat diversity**:
.When in bloom, the dense saguaro forest surrounding the Ragged Top Mountain, provides a feeding ground for the nectar feeding, lesser long-nosed bat. This endangered species may roost in natural caves or mine shafts in the area. Other bat species which may occur include Mexican long-tongued bat (a nectar feeder) and the insectivorous Yuma myotis, Cave myotis, Townsend's big-eared bat, California leaf-nosed bat, and Mexican freetailed bat.

Name: **Desert bighorn sheep**:
Description:This area contains one of the last remaining native bighorn sheep populations in southeastern Arizona. This species inhabits the rugged slopes and steep hillsides, consuming a wide variety of shrubs, grasses and annual plants. Herd size of less than one hundred animal make this population vulnerable to decline due to disease outbreaks, predation, or natural variations in climate and forage quality. Whereas a large herd would be able to recover from such losses and maintain itself over the long run, this small herd may becomes extinct without intervention. Also important to the health of the herd are movement corridors between areas of rugged terrain with the Silver Bell Mountains as well as movement corridors to and from other mountain ranges. Road, fences, mining, and housing development is gradually blocking the opportunities for sheep to move within and between ranges. In order to improve the habitat for sheep the Arizona Desert Bighorn Sheep Society, Arizona Game and Fish Department, and Bureau of Land Management have developed several water holes and closed critical lambing areas to motor vehicles.
Location: Silverbell Bighorn Sheep Special Management Area
Significance: National
Source: Hoffmeister, Donald Frederick: Mammals of Arizona. University of Arizona Press, Arizona Game and Fish Department, Tucson.

Name: **Mule Deer**
Description: A medium-sized ungulate and premier game animal of the inter-mountain west. Brown in winter, reddish in summer. Males are characterized by broad branching antlers and dark facial patch. Feeds on a wide variety of shrubs and herbaceous plants, seldom on grasses. Usually found in open deserts and woodlands
Location: Arizona
Significance: Regional
Source: Hoffmeister, Donald Frederick: Mammals of Arizona. University of Arizona Press, Arizona Game and Fish Department, Tucson.

Name: **Collared peccary**

Description: Collared peccary (also called javelina) is member of the "new world" pig family, usually 30 to 40 pounds. Dark gray in color, with a light colored "collar" over the shoulders. Travels in groups. Feeds, often by digging, on cactus, succulent plants, roots, and tubers. Found in almost all habitats in southern Arizona.
Location: Mostly southern Arizona north to the Mogollon Rim
Significance: Regional
Source: Hoffmeister, Donald Frederick: Mammals of Arizona. University of Arizona Press, Arizona Game and Fish Department, Tucson.

Name: **Mountain Lion**
Description: The largest felid of the region, rivaled only by the jaguar. More common than observation would support, but is very secretive on only rarely observed. Feeds on any animal it can catch and kill.
Location: Canyons, woodlands, and other similar areas.
Significance: Regional
Source: Hoffmeister, Donald Frederick: Mammals of Arizona. University of Arizona Press, Arizona Game and Fish Department, Tucson.

Reptile and Amphibian diversity:

Due to variety in elevation, geology, and vegetation, a wide variety of amphibians reptiles inhabit the area. These include Couch's spadefoot toad, Woodhouse's toad, Colorado rover toad, banded gecko, desert iguana, lesser earless lizard, zebra tailed lizard, collared lizard, desert spiny lizard, regal horned lizard, western whiptail, Sonoran whipsnake, coachwhip snake, gopher snake, kingsnake, western ground snake, banded sand snake, night snake, coral snake, western diamondback, sidewinder, and Mojave diamondback..

Name: **Desert tortoise:**
Description: .The most sensitive reptile (that is most likely to be affected by modifications of the habitat) in the area is the desert tortoise. The desert tortoises found in the Silver Bell Mountains are part of the Sonoran population. This herbivorous species is found throughout the area but prefers hillsides and bajadas with boulders and desert washes with caliche banks for den sites. The Silver Bell Mountain area includes Category 1, 2 and 3 desert tortoise habitat. These classifications refer to the habitat quality as it relates to 4 criteria: stability, density, and viability of tortoise populations and manageability of the habitat. Tortoise densities in the area vary from low to high depending on the specific site. Tortoise feed on a wide variety of grasses, annual plants, flowers, and shrubs. Tortoise are negatively affected by mining, grazing, road construction, collection for pets, and off-road vehicles. Population declines have been linked to disease, such as upper respiratory tract disease. Habitat degradation may be a significant factor in these disease outbreaks.

Location: Throughout the RCA
Significance: Regional
Source: Schwalbe, Cecil. Reptiles & Amphibians of Arizona. University of Arizona Press.

Name: **Gila monster**
Description: One of only two venomous lizards, Gila monster can be found in throughout the area. It feeds on a variety of prey including small mammals, birds, eggs, and small lizards. It seeks shelter in burrows, under rocks, in woodrat nests, or brush thickets when not actively hunting. Likely the tortoise it is affected by mining, road construction, collection for pets, and off-road vehicles.
Location: Throughout the RCA
Significance: Regional
Source: Schwalbe, Cecil. Reptiles & Amphibians of Arizona. University of Arizona Press.

Name: **Vegetation**
The planning area is located within the Southeastern Arizona Basin and Range. The area can be further subdivided into resource units and their corresponding ecological sites:

(12-16 inch PZ)Sonoran Semidesert Grassland
(7-12 inch PZ)Upper Sonoran Desert Shrub Mix

This area is one of the most diverse ecological areas in North America. Plant communities found on these ecological sites are strongly influenced by the soil's ability to capture the intense summer thunderstorms.

The current potential natural vegetation for most of the area is upper-sonoran desert shrub. Three-awn species dominate the grass understories. Ironwood, saguaro, cholla, prickly pear, triangle-leaf bursage, ocotillo and mesquite overstories occur throughout the area. Ironwood trees are predominant along the stream beds and sandy washes.
Location: Silverbell resource conservation area
Significance: International
Source: U.S. Department of Agriculture, Soil Conservation Service. *Land Resource Regions and Major Land Resource Areas of the United States.* Agriculture Handbook 296. Washington, D.C.: Government Printing Office.

Special Status Plants

Name: **Nichols Turkshead Cactus**
Description: Although the planning area has a high diversity of plants, only three are considered of special concern for management. The Nichols Turks head cactus (*Echinocactus [= Neolloydia] horizontalonius* var *nicholii*) is a federally listed species found in

eastern Pima county. Typically the cactus is found on open sites dominated by desert grassland or mixed shrub vegetation.
Location: Waterman Mountains Area of Critical Environmental Concern
Significance: National
Source: BLM TFO Files

Name: **Pima Indian Mallow** *(Abutilon parishii)*
Description: The pima indian mallow is a former catagory 2 candidate species and BLM sensitive species that grows at 3,000 to 4,800 feet in elevation, almost exclusively in thecanyons with south or west exposures. It has been found in 17 mountain ranges from central Arizona to Sonora, Mexico. In 1991, the Pima Indian Mallow was found on Ragged Top peak.
Location: Silverbell RCA
Significance: National
Source: BLM TFO Files

Name: **Tumamoc Globeberry** (*Tumamoca macdougalii*)
Description: The Tumamoc Globeberry was federally listed as endangered, but has since been delisted, and BLM sensitive species. It has been found in the Avra valley near gullys and sandy washes of hills and valleys. Potential habitat for the species is in all areas of the RCA below 3,000 feet elevation.
Location: Silverbell RCA
Significance: Regional
Source: U.S. Department of the Interior, Fish and Wildlife Service. Endangered and Threatened Wildlife and Plants; http://ifw2es.fws.gov/EndangeredSpecies/lists/

AREAS WITH SPECIAL MANAGEMENT

Name: **Silverbell Resource Conservation Area**
Description: The Silver Bell RCA, covering 150,114 acres was designated in the Phoenix RMP for the purpose of retaining public lands (surface and subsurface estate) and to consolidate public ownership and intensively manage lands in the RCA. The RCA contains several different Special Management Areas (SMA's) protecting the unique features of the area. These include the Agua Blanco Ranch Multiple Resource Management Area which covers 16,699 acres, and has an activity plan for the Agua Blanco Ranch Multiple Resource Management Area to improve watershed condition, increase soil cover, and reduce sediment. The 47,976 acre Cocoraque Butte-Waterman Mountains Multiple Resource Management Area has an activity plan for the Cocoraque Butte-Waterman Mountains Multiple Resource Management Area and manage to improve watershed condition, increase soil cover, reduce sediment yield, improve ecological site condition to good and promote the recovery of an endangered plant. vegetation condition, improve

	native fish habitat, reintroduce native fish, if feasible, enhance water quality and stream flow, increase soil cover, reduce sediment yield and improve ecological site condition to good.
Location:	Surrounding proposed Ironwood preserve
Significance:	National
Source	Phoenix Resource Management Plan and Final Environmental Impact Statement, December 1988

Name:	**Agua Blanco Ranch Multiple Resource Management Area**
Description:	The Agua Blanco Ranch Multiple Resource Management Area which covers 16,699 acres, and has an activity plan for the Agua Blanco Ranch Multiple Resource Management Area to improve watershed condition, increase soil cover, and reduce sediment
Location:	Southeast part of the RCA
Significance:	Regional
Source	Phoenix Resource Management Plan and Final Environmental Impact Statement, December 1988

Name:	**Cocoraque Butte-Waterman Mountains Multiple Resource Management Area**
Description:	The 47,976 acre Cocoraque Butte-Waterman Mountains Multiple Resource Management Area has an activity plan for the Cocoraque Butte-Waterman Mountains Multiple Resource Management Area and manage to improve watershed condition, increase soil cover, reduce sediment yield, improve ecological site condition to good and promote the recovery of an endangered plant. Also to improve vegetation condition, improve native fish habitat, reintroduce native fish, if feasible, enhance water quality and stream flow, increase soil cover, reduce sediment yield and improve ecological site condition.
Location:	Southwest part of the RCA
Significance:	Regional
Source	Phoenix Resource Management Plan and Final Environmental Impact Statement, December 1988

Name:	**Waterman Mountains Area of Critical Environmental Concern**
Description:	ACEC established in the Phoenix RMP to protect the habitat for the Nichols Turkshead Cactus , containing 1,960 acres of Public land.
Location:	Waterman Mountains.
Significance:	National
Source:	Phoenix Resource Management Plan and Final Environmental Impact Statement, December 1988

Name:	**Avra Valley Cultural Resource Management Area**
Description:	The 2,720 acre Avra Valley Cultural Resource Management Area contains 14

	archaeological sites to be managed for for information potential and 1 for conservation values.
Location:	Southwest side of the RCA
Significance:	National
Source:	Phoenix Resource Management Plan and Final Environmental Impact Statement, December 1988

Name:	**Silverbell Desert Bighorn Sheep Management Area**
Description:	The 56,800 acre Silver Bell Desert Bighorn Sheep Management Area is to be managed for improved habitat condition for desert bighorn sheep. Up to 17,630 acres of state and private land in the Silver Bell Desert Bighorn Sheep Management Area were identified for acquisition in the Phoenix RMP.
Location:	Silverbell and West Silverbell Mountains
Significance:	Regional
Source:	Phoenix Resource Management Plan and Final Environmental Impact Statement, December 1988

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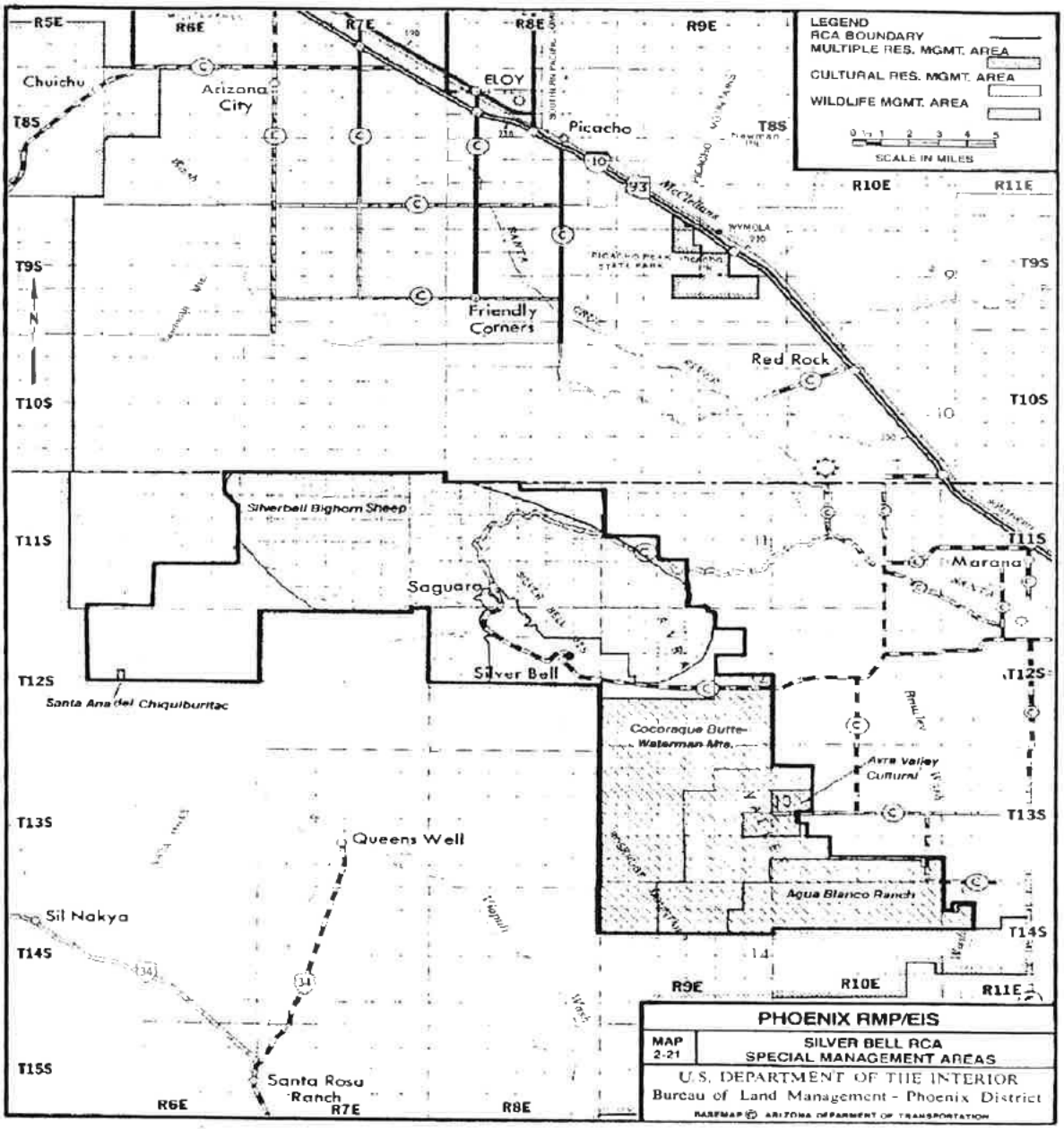
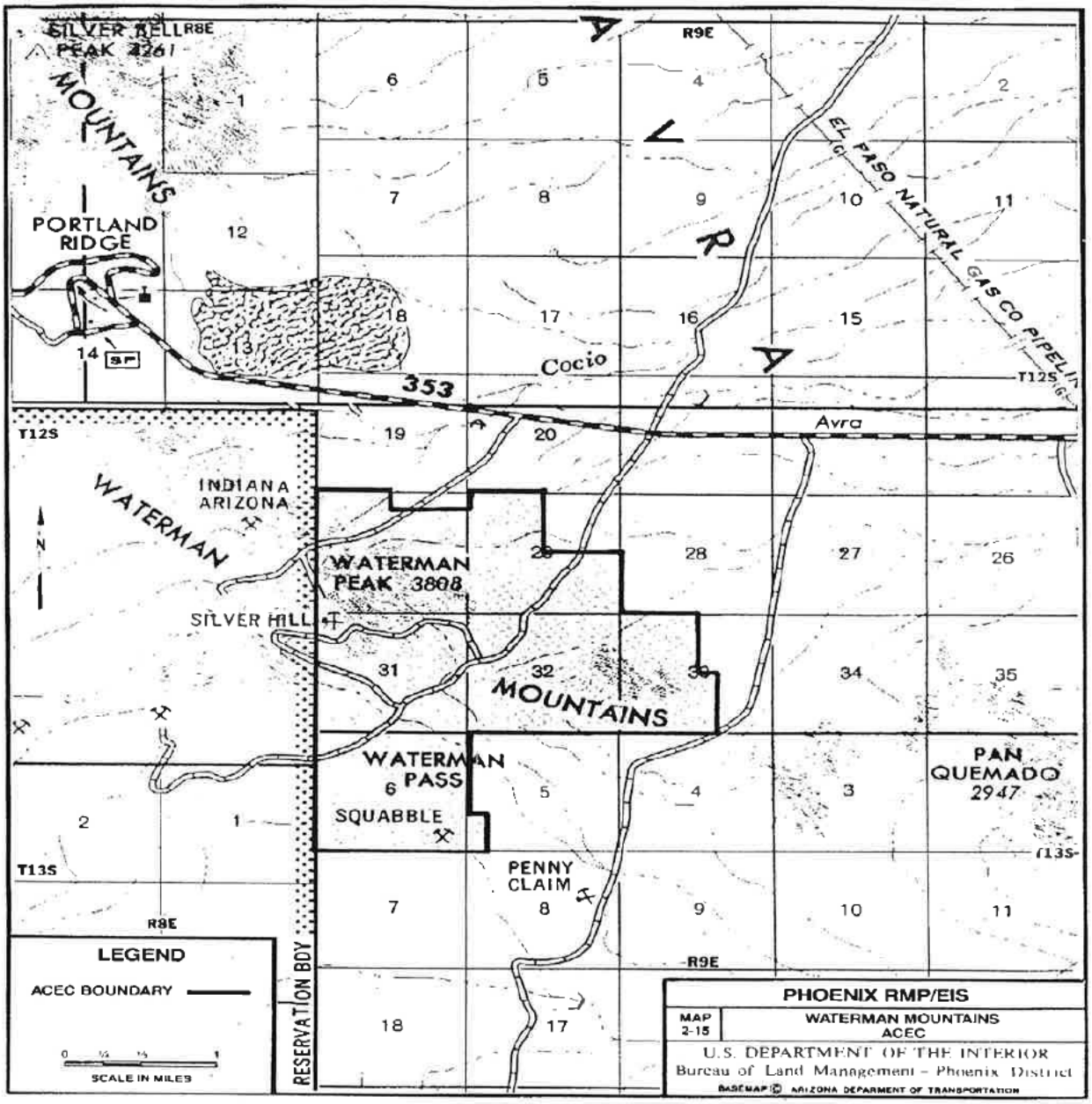

LEGEND
RCA BOUNDARY
MULTIPLE RES. MGMT. AREA
CULTURAL RES. MGMT. AREA
WILDLIFE MGMT. AREA
SCALE IN MILES
R5E
R6E
R7E
R8E
R9E
R10E
R11E
T8S
T9S
T10S
T11S
T12S
T13S
T14S
T15S
Chuichu
Arizona City
ELOY
Picacho
Friendly Corners
Red Rock
Silverbell Bighorn Sheep
Saguaro
Silver Bell
Marana
Santa Ana del Chiquiburitac
Cocoraque Butte-Waterman Mts.
Avra Valley Cultural
Queens Well
Agua Blanco Ranch
Sil Nakya
Santa Rosa Ranch
PHOENIX RMP/EIS
MAP 2-21
SILVER BELL RCA SPECIAL MANAGEMENT AREAS
U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Phoenix District
BASEMAP © ARIZONA DEPARTMENT OF TRANSPORTATION


SILVER BELL
PEAK 2261
R8E
R9E
MOUNTAINS
PORTLAND RIDGE
EL PASO NATURAL GAS CO PIPELIN
Cocio
353
T12S
Avra
INDIANA ARIZONA
WATERMAN
WATERMAN PEAK 3808
SILVER HILL
MOUNTAINS
WATERMAN PASS
SQUABBLE
PAN QUEMADO 2947
PENNY CLAIM
T13S
RESERVATION BDY
LEGEND
ACEC BOUNDARY
SCALE IN MILES
PHOENIX RMP/EIS
MAP 2-15
WATERMAN MOUNTAINS ACEC
U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management - Phoenix District
BASEMAP © ARIZONA DEPARMENT OF TRANSPORTATION

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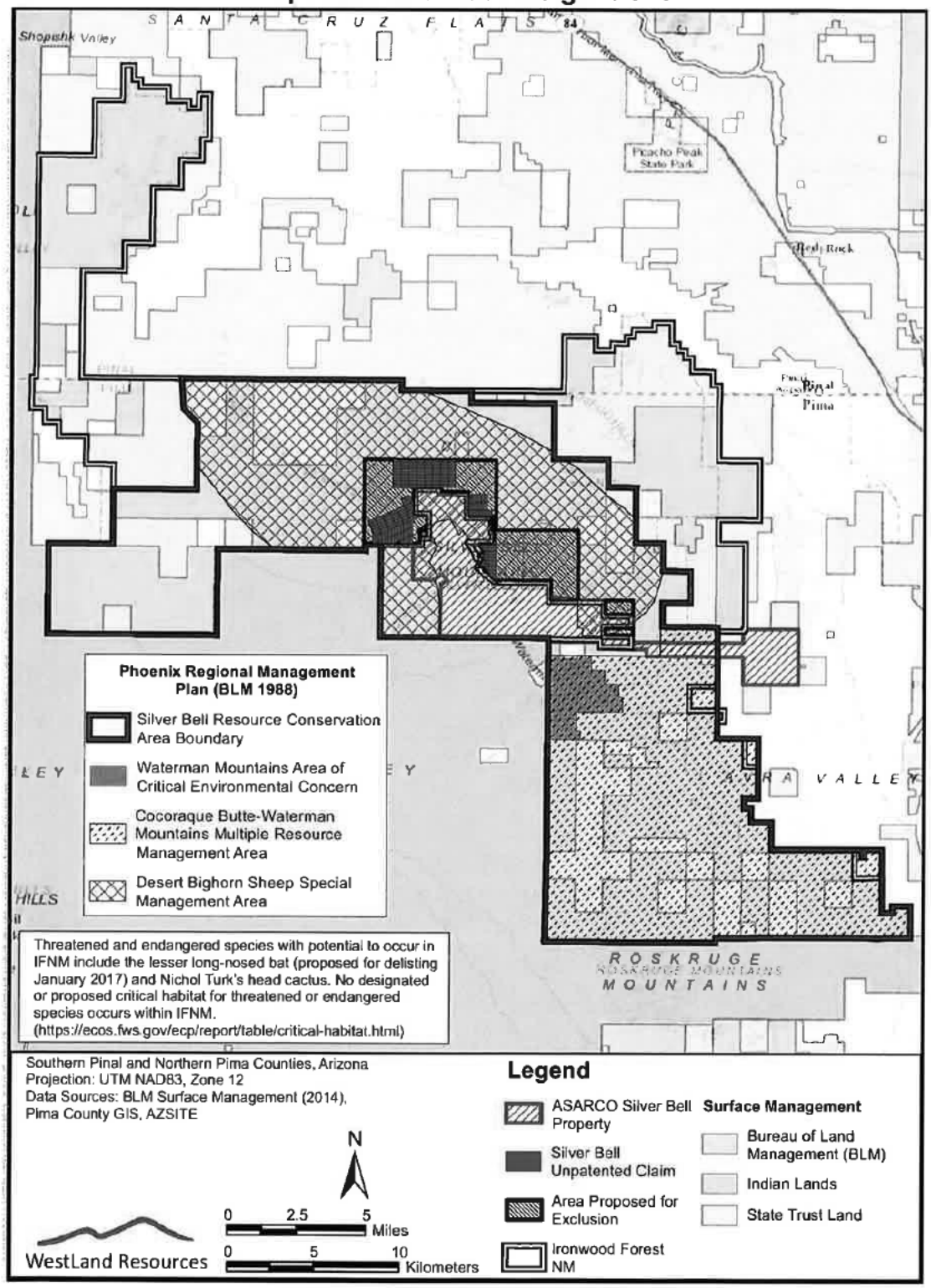
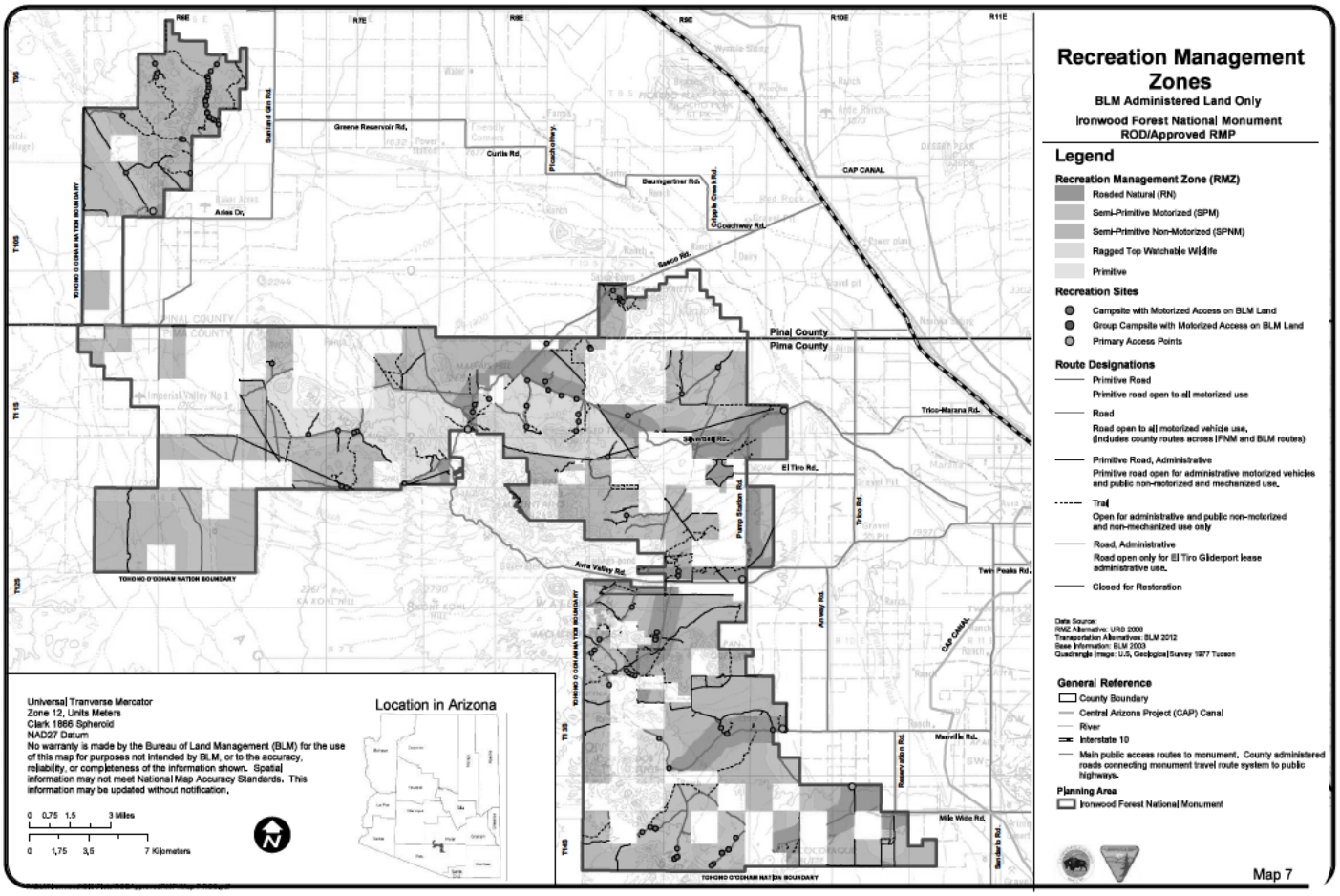
Page 19.

Tab 7

BLM Phoenix Regional Management Plan
Special Land Use Designations



Tab 8


Recreation Management Zones
BLM Administered Land Only
Ironwood Forest National Monument
ROD/Approved RMP
Legend
Recreation Management Zone (RMZ)
Roaded Natural (RN)
Semi-Primitive Motorized (SPM)
Semi-Primitive Non-Motorized (SPNM)
Ragged Top Watchable Wildlife
Primitive
Recreation Sites
Campsite with Motorized Access on BLM Land
Group Campsite with Motorized Access on BLM Land
Primary Access Points
Route Designations
Primitive Road
Primitive road open to all motorized use
Road
Road open to all motorized vehicle use. (Includes county routes across IFNM and BLM routes)
Primitive Road, Administrative
Primitive road open for administrative motorized vehicles and public non-motorized and mechanized use.
Trail
Open for administrative and public non-motorized and non-mechanized use only
Road, Administrative
Road open only for El Tiro Gliderport lease administrative use.
Closed for Restoration
Date Source:
RMZ Alternative: URS 2008
Transportation Alternatives: BLM 2012
Base Information: BLM 2003
Quadrangle Image: U.S. Geological Survey 1977 Tucson
General Reference
County Boundary
Central Arizona Project (CAP) Canal
River
Interstate 10
Main public access routes to monument. County administered roads connecting monument travel route system to public highways.
Planning Area
Ironwood Forest National Monument
Map 7
Universal Tranverse Mercator
Zone 12, Units Meters
Clark 1866 Spheroid
NAD27 Datum
No warranty is made by the Bureau of Land Management (BLM) for the use of this map for purposes not intended by BLM, or to the accuracy, reliability, or completeness of the information shown. Spatial information may not meet National Map Accuracy Standards. This information may be updated without notification.
0 0.75 1.5 3 Miles
0 1.75 3.5 7 Kilometers
Location in Arizona
Pinal County
Pima County
TOHONO O'ODHAM NATION BOUNDARY
CAP CANAL
Greene Reservoir Rd.
Curtis Rd.
Baumgartner Rd.
Coachway Rd.
Sasco Rd.
Aries Dr.
Silverbell Rd.
El Tiro Rd.
Pump Station Rd.
Trico-Marana Rd.
Twin Peaks Rd.
Avra Valley Rd.
Marvin Rd.
Mile Wide Rd.
Sandario Rd.
Reservation Rd.
Sandland Gin Rd.
Flowing Wells Rd.
Imperial Valley No 1

Tab 9

JANE DEE HULL
GOVERNOR
STATE OF ARIZONA

April 6, 2001

Ironwood

The Honorable Gale Norton
Secretary of Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Secretary Norton:

Thank you very much for your letter of March 28, 2001 in regard to the impact of National Monument designations within the State of Arizona.

As you know, during the past year, five new National Monuments were declared in Arizona encompassing an estimated two million acres of Arizona. This is an area approximately equivalent in size to the combined states of Delaware and Rhode Island. A land mass of such notable size carries with it a number of impacts, and I am grateful for the opportunity to share my perspective on those impacts.

As a preliminary matter, I would like to say that much of the land that lies within the boundaries of our five new National Monuments is exquisite and certainly worthy of conservation. In Arizona, we are aggressive in our pursuit of conservation, and we have several ongoing programs and projects that allow us to set aside our most magnificent scenery. Even now, we are supporting state legislation that will enable Arizona to engage in land exchanges that will result in the conservation of special State Trust lands.

My fundamental concern with the five new National Monuments is the inadequate selection process through which they were established. As a result of planning that occurred almost exclusively in Washington D.C., and not in Arizona, we have monuments with boundaries that do not protect the best of the terrain, do not give due consideration to wildlife management, do not allow vital energy transmission to cross into regions of the state, render hundreds of thousands of acres of School Trust land nearly valueless, prohibit essential roads, create uncertainty in the state's long-term water supply, and diminish the use of thousands of acres of private property.

I believe the inadequacy of the selection process was the direct result of a nearly complete failure on the part of the former administration of the Department of the Interior to provide meaningful opportunity for Arizona residents and qualified experts to participate. To highlight the absence of that participation, please note that neither I nor

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any member of my cabinet was ever invited to a public meeting to discuss the potential declaration of any monument. Moreover, three of the monuments were declared with virtually no public process. The only sign that an area was under consideration for monument status was a visit to this state by the former secretary for a short hike to which a handful or supporters and select media were invited.

Please review your records to verify this claim. It would be very interesting to learn what the file has to say in regard to public participation prior to each declaration in Arizona.

Other concerns I have in regard to the monuments are site specific, and I have attached for your review a list of concerns my cabinet and I have compiled on each monument. You will notice the same concern often arises with multiple monuments. Where possible, we have also listed potential solutions to the issues raised. While the solutions may not be perfect, they certainly reflect more closely the will of those who make their home in this state.

Please note before you review this list that I am not suggesting the repeal of any monument in Arizona, nor a reduction in the size of any monument. I am simply asking that boundaries and proclamation language be amended where necessary to protect the best interests of the citizens of this state, including the certainty of their water and electricity supplies, school funding, necessary roads and sound wildlife management.

I appreciate your consideration of the following lists. If you need any additional information, I would be delighted to provide it.

Sincerely,

Jane Dee Hull

JANE DEE HULL
Governor

IRONWOOD FOREST

NATIONAL MONUMENT

Summary of Impacts of Monument Designation on Existing or Planned Activities on State Trust lands Within the Specific Monuments

Ironwood Forest - Approximately 54,700 acres of State surface and 37,600 acres of State mineral estate are within the 201 square mile Monument located in south central Arizona. Most of the State land within the Monument is best described as being large blocks of Trust lands located on the periphery of targeted federal lands. State Trust lands make up almost half (43%) of the Monument.

1. Livestock grazing - Approximately 53,300 acres (97%) of the State land within the Monument is currently leased for livestock grazing under eight grazing leases. The Monument designation is subject to existing valid rights including livestock grazing. These rights, however, can be regulated in order to protect the purpose of the Monument. Generally the State grazing lands are used in conjunction with federal lands within one lessees ranch allotment. If grazing is reduced or eliminated on the federal land within the Monument, the lessees may be forced to reduce their livestock herds, fence off the federal lands, construct additional improvements (i.e. water, corrals, fencing, etc.) and periodically request to graze additional livestock on the remaining State lands. Eventually the lessees may be forced out of business due to the reduced availability of range land resources.

2. Agriculture - The Monument encompasses an active 680 acre agricultural lease (SESE Section 16, All Section 22, T11S, R6E). The agricultural lease is located on the western boundary of the Monument and does not appear to fit any criteria described as the purpose of the Monument.

3. Commercial - One State commercial lease (3.67 acres, Section 26, 27, T10S, R 9E) for communication purposes and 495 acres of commercially classified lands (unleased) are located within the Monument's eastern boundary. The town of Marana has expanded to within four miles of the Monument's eastern boundary while rural residential development is occurring in the area.

4. Rights of Way - There are 14 existing rights of way across State land for various purposes within the Monument, mostly confined to the northern position of the Monument. Expansion of these rights of way may be restricted resulting from restrictions on adjacent federal lands. New rights of way may be rerouted away from State lands due to their inclusion in the Monument. A major gas line (El Paso Natural Gas) crosses the northeastern portion of the Monument and includes State land.

5. Access - Motorized and mechanized vehicle travel off-road is prohibited within the Monument other than for administrative or emergency purposes. Vehicular traffic is confined to existing roads and trails. No new roads may be developed. Future road closures and travel restrictions may be enforced to protect the Monument. These closures may impact access to the State lands.

6. Mining - There are no mining leases or prospecting permits on State land within the Monument. New mining claims or mineral leases are prohibited as the federal lands within the Monument are withdrawn from the 1872 Mining Law as well as other mineral leasing acts and related laws. The Monument entraps ASARCO's Silver Bell mine between the Monument and the Tohono O'Odham Indian Reservation. The State has several thousand acres of mineral estate within the Monument and adjacent to the Silver Bell mine. State land is included within the projected trend of mineralization being mined by ASARCO. Silver Bell Mine or initiation of new mining on the State lands is effectively stymied due to the restrictions placed on adjacent federal lands. The Department reports that the Monument lies within a zone identified as having potential for multiple undiscovered copper deposits. State estimates potential loss of $100 million in mineral rights held by State.

CURRENT REVENUES (2000-2001) OF STATE LAND CONTRACTS

Ironwood Forest National Monument (54,772.79ac)

53,274.39 acres 8 Grazing leases	$3,196
3.67 acres 1 Commercial lease	$1,500
680.00 acres 1 Ag lease	$10,000
2.00 acres 2 Ag Slups (leased)	$1,000
320.00 acres 1 Grazing Slup (unleased)	$100
various acres 6 (10yr. Pay Rights of Way)	$5,600
495.25 acres Unleased Commercial	

Note: Perpetual rights of way that have paid in full are not reflected in annual rent

Ninety-five percent of the State Trust Lands within this monument belongs to the Public Schools.

Arizona Game and Fish Department Comments on the Federal Lands Within the Ironwood Forest National Monument

Presidential Proclamation

Wildlife conservation represents one of the primary purposes of the National Monument. To reaffirm the importance of wildlife management and maintaining and enhancing wildlife resources and wildlife-related recreation within the Monument, the Arizona Game and Fish Department recommends adding the following language to the Proclamation (after the description of natural/wildlife resources in the introduction; page 1):

Wildlife conservation shall be a high priority within the monument. Management actions will ensure the continued well-being of existing, re-introduced, supplemented or expanded populations of wildlife. Necessary management actions within the monument could include releases of wildlife into currently unoccupied habitats, maintenance of existing wildlife water developments, construction of new wildlife water developments, and implementation of other wildlife habitat improvement projects.

Surface disturbance and vegetation manipulation (e.g., chaining, disking, burning) that is necessary to maintain the wildlife management, research, and ecological restoration purposes of the Monument shall be allowed.

To address our specific concerns regarding wildlife management and wildlife-related recreation, we recommend changing several of the standard paragraphs, as follows [each statement from the Proclamation (pages 2 and 3) is followed by our recommended language]:

For the purpose of protecting the objects identified above, all motorized and mechanized vehicle use off road will be prohibited, except for emergency or authorized administrative purposes.

The use of motorized vehicles will continue to be allowed on existing roads and trails within the monument. For the purposes of protecting the objects identified above, motorized vehicle use off road will be prohibited, except for emergency or authorized administrative purposes. Necessary wildlife management activities will be considered authorized administrative purposes for off-road vehicular use in the Monument.

The Secretary of the Interior shall manage the monument through the Bureau of Land Management, pursuant to applicable legal authorities, to implement the purposes of this proclamation.

The Secretary of the Interior, through the Bureau of Land Management, shall manage the land within the monument, pursuant to applicable legal authorities. The State of

Arizona, through the Arizona Game and Fish Department, shall manage the wildlife within the monument. The Arizona Game and Fish Department shares management authority for migratory, threatened, endangered, and candidate fish and wildlife species with the U.S. Fish and Wildlife Service.

The Secretary of the Interior shall prepare a transportation plan that addresses the actions, including road closures or travel restrictions, necessary to protect the objects identified in this proclamation.

The Secretary of the Interior, through the Bureau of Land Management, shall prepare a transportation plan that addresses the actions necessary to protect the objects identified in this proclamation. The transportation plan shall reflect the mutual agreement of the State of Arizona, through the Arizona Game and Fish Department.

Should the decision be made to close a road or trail, or portion of a road or trail, within the monument, consideration must be given to providing alternative vehicular access to that area.

Nothing in this proclamation shall be deemed to enlarge or diminish the jurisdiction of the State of Arizona with respect to fish and wildlife management.

Nothing in this proclamation shall be deemed to diminish the jurisdiction and necessary management activities of the State of Arizona with respect to wildlife management, including the establishment of wildlife population goals and the regulation of hunting, within the monument.

The BLM will consult with the Arizona Game and Fish Department prior to any action or decision that may affect wildlife resources and wildlife management with the Monument.

AGFD comment - The statement, "Warning is hereby given to all unauthorized persons not to appropriate, injure, destroy, or remove any feature of this monument and not to locate or settle upon any of the lands thereof" should be modified to clarify the specific type(s) of action(s) that will be prohibited within the monument. If this prohibition applies on all public lands managed by the BLM (which is likely the case under FLPMA) - the "warning" statement should be deleted.

Arizona Game and Fish Department Comments on the Federal Lands Within the Ironwood Forest National Monument

Interim Management Policy

Under, "Adhere to direction in the President's Proclamation:", Add: *Wildlife conservation shall be a high priority within the monument.*

Modify: The State's responsibilities, authorities, *and abilities* regarding wildlife management, including fishing and hunting, within the Monument are unaffected by the Proclamation *and shall be unaffected by this policy and the new management plan for the Monument.*

Add: *Interim wildlife management will focus on completing wildlife projects that were started prior to the area being designated as a Monument.*

Add: *Prepare a new wildlife management plan in cooperation with the Arizona Game and Fish Department. The new wildlife management plan must reflect the mutual agreement of the agencies.*

Attachment 1-1 Discussion of Specific Activities – first paragraph -

Add: *Proposed restrictions that have the potential to impact fish and wildlife resources, or the management of those resources, shall include coordination and consultation with the Arizona Game and Fish Department.*

Wildlife management activities by the Arizona Game and Fish Department generally do not conflict with the established purposes of the Monument. The BLM will consult with the Arizona Game and Fish Department prior to any action or decision that may affect wildlife resources and management with the Monument.

Under, "Animal Damage Control", Delete, "...specifically targeting individual predators rather than predator populations.".

Add, *This will not affect the Arizona Game and Fish Department's predator management objectives and activities, including contracting with Wildlife Services for predator management activities, with the Monument.*

Under, "Hunting and Fishing", Add - *Hunting and fishing shall be allowed within the monument in accordance with applicable laws and regulations of the United States and the State of Arizona. The use of wheeled game carriers shall be allowed within the monument for the retrieval of downed big game.*

Attachment 1-2

Off-Road Vehicles – Delete: "Motorized and mechanical vehicular use should only occur on designated roads or routes."

Add – *Necessary wildlife management activities will be considered authorized administrative purposes for off-road vehicular use in the Monument.*

Add – *Should the decision be made to close a road or trail, or portion of a road or trail, within the monument, consideration must be given to providing alternative vehicular access to that area.*

Roads – Add (first sentence) – *The use of motorized vehicles will continue to be allowed on existing roads and trails within the monument. Should the decision be made to close a road or trail, or portion of a road or trail, within the monument, consideration must be given to providing alternative vehicular access to that area.*

Scientific, Archeological, and Historical Investigations – Modify the last sentence, as follows -- "but surface disturbance should be avoided" *to the greatest extent possible.*

Vegetation Manipulation – Replace the existing sentence, with – *Chaining or other methods that cause surface disturbance but are necessary for wildlife management or an authorized science-based ecological restoration project shall be permitted.*

Wilderness Study Areas – Replace the first sentence, with - *Future Wilderness designation within the Monument is inconsistent with the Proclamation and will not be considered during interim and future management of the area.*

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DISTRICT 11

COMMITTEES:
APPROPRIATIONS
APPROPRIATIONS SUBCOMMITTEE ON PUBLIC SAFETY, INFRASTRUCTURE & RESOURCES, CHAIRMAN
ENERGY, ENVIRONMENT & NATURAL RESOURCES
WAYS & MEANS, VICE-CHAIRMAN

JOINT COMMITTEE ON CAPITAL REVIEW
JOINT LEGISLATIVE BUDGET COMMITTEE

July 7, 2017

Monument Review
MS-1530
U.S. Department of the Interior
1849 C Street N.W.
Washington, D.C. 20240

Subject: DOI-2017-0002, Review of Certain National Monuments Established Since 1996; Notice of Opportunity for Public Comment

To Whom It May Concern:

Thank you for the opportunity to provide public comments regarding the review of specific Arizona National Monuments over 100,000 acres designated since 1996. We are providing these comments relative to the Ironwood Forest National Monument ("IFNM") as it is located in our 11th Arizona Legislative District. We request that the Department of Interior modify the boundaries of the IFNM to take into account the property rights of the private land owners and the State of Arizona within the IFNM.

President William Clinton hastily designated the Ironwood Forest National Monument on June 9, 2000, without a public review or public input process. The lack of public input led to the creation of the IFNM which is comprised of approximately 33% State Trust land and other private land holdings. The inclusion of these lands has created a situation where these lands cannot be fully utilized or developed, which negatively impacts the private property owners and the State of Arizona. The inclusion State Trust land negatively impacts the beneficiary of the trust, Arizona's public school system. Additionally, the IFNM is adjacent to the historic Silver Bell Mining District, which has been producing minerals for over a century, and prevents current mining operations from future exploration. Governor Jane Dee Hull, in a letter to then Secretary of Interior Gale Norton dated April 6, 2001, estimated that this represented a potential loss of $100 million to the State of Arizona. This is an unacceptable loss for Arizona and for our legislative district.

Over 50% of Arizona's land is held by the federal government, which significantly impacts Arizona's economy. In the last years of President Clinton's administration, approximately 2 million additional acres were designated as new national monuments in Arizona. Due to the lack of public input and the inclusion of an unprecedented amount of State Trust and private land, we request that the boundaries of the Ironwood Forest National Monument be formally reviewed to take into account state and private property rights.

Sincerely,

Representative Vince Leach
Legislative District 11

Representative Mark Finchem
Legislative District 11

Senator Steve Smith
Legislative District 11