

From: Moore, Nikki
To: [Bowman, Randal](#)
Cc: [McAlear, Christopher](#); [Kathleen Benedetto](#); [Michael Nedd](#); [John Ruhs](#); [Sally Butts](#); [Timothy Fisher](#); [Raymond M Suazo](#); [Rawhouser, Deborah](#); [Aaron Moody](#); [Kenneth Mahoney](#); [Timothy Spisak](#); [Kristin Bail](#); [Peter Mali](#); [Matthew Allen](#)
Subject: Ironwood Forest NM Initial Data Request: Exec Summary, Data Summary, New Information Request Responses
Date: Saturday, June 03, 2017 6:27:37 PM
Attachments: [Ironwood NM Data Summary 6 2 2017.docx](#)
[Ironwood NM Executive Summary 6 2 2017.docx](#)
[Ironwood NM New Information Requested 6 2 2017.docx](#)

Hi Randy,

We have completed our review of the initial responses provided in response to the April 26, 2017 Executive Order 13792 and initial data request for the Ironwood Forest National Monument. Please find attached an executive summary and data summary. These two summary documents along with the requested data and supporting sources of information have been uploaded to the respective Google Drive folder for the Ironwood Forest National Monument.

Per your request, I have also attached the responses to the new, additional information requested in a word document. ("Ironwood NM_New Information Requested_6_2_2017").

Nikki Moore
Acting Deputy Assistant Director
National Conservation Lands and Community Partnerships
Bureau of Land Management, Washington D.C.
202.219.3180 (office)
202.740.0835 (cell)

Call for Data Related to Review of National Monuments under EO 13792 (April 26, 2017)

Ironwood Forest National Monument

1. Documents Requested
 - a) Resource Management Plans/Land Use Plans
 - i. The Ironwood Forest National Monument Approved Resource Management Plan (RMP) and Record of Decision (ROD) is located within this drive ([1ab.IFNM_mgmt_plan.pdf](#))
 - b) Record of Decision
 - i. RMP Record of Decision (ROD) approved February 2014. It is included in the RMP document located within this drive ([1ab.IFNM_mgmt_plan.pdf](#))
 - c) Public Scoping Documents
 - i. RMP Scoping report, completed February 12, 2004, is located within this drive ([1c.IFNM_scoping_report](#))
 - d) Presidential Proclamation
 - i. Presidential Proclamation 7320- Establishment of the Ironwood Forest National Monument, June 9, 2000 is located within this drive ([1d.IFNM_proclamation](#))
2. Information on activities permitted at the monument, including annual levels of activity from the **date of designation to the present**

Designation Date for IFNM is June 9, 2000.

- a) Recreation - annual visits to site
 - i. IFNM uses the Recreation Management Information System (RMIS) to report recreation use, which is calculated from limited traffic counts. BLM is currently working on changes to RMIS that will improve our visitation reporting and addressing an anomaly for 2016 data.

YEAR	VISITS
2001	15,900
2002	11,974
2003	21,025
2004	27,550
2005	22,500
2006	16,200
2007	17,100
2008	17,900
2009	19,300
2010	23,026
2011	26,000
2012	30,373
2013	43,640
2014	47,435

2015	58,020
------	--------

Note: The 2014 IFNM RMP closed the monument to recreational target shooting activity.

- b) Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any)
- No production of coal, oil, gas or renewable energy has occurred on IFNM since designation.
 - The amount of energy transmission infrastructure on IFNM has not changed since designation. Current energy transmission infrastructure on IFNM is listed in the table below.

SERIAL NUMBER	Sum Miles	Comment
A-19136	0.3	Electric Transmission
A-2024	5.8	Electric Transmission
A-2205	0.7	Electric Transmission
A-7274	5.7	Electric Transmission
A-7872	7.3	Electric Transmission
A-7874	1.7	Electric Transmission
AR-023490	20.7	Electric Transmission
AR-025949	1.4	Electric Transmission
AR-030401	5.1	Electric Transmission
AR-031023	2.1	Electric Transmission
AR-03905	3.0	Electric Transmission
AR-05586	1.8	Natural Gas
AR-0612	2.0	Electric Transmission
AZA-23405	1.1	Electric Transmission
PHX-083253	8.8	Natural Gas
PHX-084351	1.7	Electric Transmission
PHX-086067	6.9	Natural Gas

Total	76.1 Miles	
-------	------------	--

- c) Minerals - annual mineral production on site
- i. Since monument designation, no mineral production has occurred on federal land within the IFNM boundary.
 - ii. Mining claims existing at the time of monument designation and remaining active would require a validity exam and Mining Plan of Operation before mineral production. Monument lands were withdrawn from mineral entry by the proclamation.
 - iii. The 4200-acre Silver Bell copper mine on adjacent private land was discovered, after designation, to have an unauthorized pipeline across monument land. The operator moved the pipeline and completed the regrading and revegetation required by the BLM, as this was less expensive than completing a Mining Plan of Operations in order to authorize the pipeline. Although authorizing the pipeline after designation would have also required a validity exam, whereas authorizing the pipeline prior to designation would have only required a Mining Plan of Operations, in either case moving the pipeline was less expensive and therefore the more appealing option for the operator.
 - iv. The 120-acre Pioneer Materials mineral materials quarry on adjacent private lands has not been impacted by activities on the monument since designation. BLM issued and administers a right-of-way for hauling material across monument lands.
 - v. The 40-acre Kalamazoo minerals material quarry opened on adjacent private land after monument designation. This quarry was permitted by the Arizona State Mine Inspector.
- d) Timber - annual timber production on site (in board-feet, CCF, or similar measure)
- i. No timber production has occurred on IFNM since designation. The Sonoran Desert ecosystem has no timber resource nor provides timber products.
- e) Grazing – annual grazing on site (AUMs permitted and sold)
- i. The number of AUMs permitted (7,849) has not changed since designation. The number of AUMs sold each year is at the lessee’s discretion based on weather and forage production, with numbers being lower during drought years. See tables located within this Drive: [2e.IFNM Billed AUMs](#), [2e.IFNM Permitted Active AUMs by Allotment as of 2017-5-23](#)
- f) Subsistence - participation rates for subsistence activities occurring on site (fishing, hunting, gathering); quantities harvested; other quantifiable information where available
- i. No subsistence activities have occurred on the IFNM since designation. There are no formal subsistence activities outside of Alaska. IFNM does provide for the

collection of certain natural materials by Native American Indians. There have never been sport fish on the IFNM. The terms of the Proclamation ("The establishment of this monument is subject to valid existing rights. 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.") state that regulation of hunting and fishing in the monument remains with the State.

- ii. Arizona Game and Fish Department does not measure hunting participation rates for the IFNM separate from the remainder of the Game Management Unit in which the monument is located.
- g) Cultural - list of cultural uses/values for site; number of sites; other quantifiable information where available
- i. Cultural resources data are compiled from the *Ironwood Forest National Monument Proposed RMP and Final EIS* (2011), the AZSite online database (administered by the Arizona State Museum), and the cultural heritage program files at the BLM Tucson Field Office.
 - ii. To date, approximately 12.5 percent of BLM-administered lands within the monument (~16,000 acres) has been inventoried for cultural resources. Roughly half of the current survey data was generated after the date of the Monument Proclamation, resulting in a net doubling of the number of known and/or documented cultural resources sites within the monument.
 - iii. The various surveys within the monument have resulted in the documentation of 310 archaeological and historical sites; approximately half of the known sites have been identified and documented since the date of Monument Proclamation. Analysis of current data provides an average density of approximately 11 cultural resources sites per square mile on BLM-administered lands with a projected total estimate of 3,000 to 6,000 sites likely to exist across the entirety of the monument.
 - iv. Cultural Values. Evidence of Paleoindian occupation (circa 12,000-8,000 B.C.) within the monument is currently limited to isolated spear points (Agenbroad 1967; Ayres 1970; Doelle 1985; Huckell 1984). Several Late Archaic/Early Agricultural era sites (circa 1,500 B.C.-A.D. 650) have been discovered along the course of the Santa Cruz River southeast of the monument (Gregory and Mabry 1998; Mabry et al. 1997); these sites include some of the oldest known canal systems and pottery types in southern Arizona (Gregory 1999; Heidke 1997; Heidke and Ferg 1998; Mabry 1999). Formative era sites (circa A.D. 650-1400) dominate the regional archaeological record and reflect an adaptation based on farming villages. Around A.D. 500, a culture referred to as the Hohokam began to flourish and occupied much of what is now southern and central Arizona for approximately a millennium. Evidence of the Hohokam occupation dominates the archaeological record of the monument. Other identified cultural affiliations

include historic-era Euro-American, Protohistoric and/or historic O'odham, possible Patayan components, and a possible Apache component.

- v. Tribal Interests. The BLM regularly consults with five Native American tribes who claim ancestral and/or traditional interest in the lands and resources of the monument: the Hopi Tribe, Pascua Yaqui Tribe, Tohono O'odham Nation, White Mountain Apache Tribe, and the Yavapai-Apache Nation. There is limited information regarding specific places within the monument that have been identified as having traditional cultural significance; however, tribes with ancestral ties to the region are known to have concerns about the treatment of human remains, funerary objects, sacred objects, and objects of cultural patrimony.

Members of the Tohono O'odham Nation, which borders the monument to the west, likely consider stands of saguaro where fruit was or may be collected as having significance (c.f., Nabhan 1987, 1982). The Cocoraque Butte area also is known to have some significance as a potential traditional cultural place. Tribal interests in the lands and resources of the monument as expressed through ongoing consultations with the O'odham include indigenous plant resources, access for tribal members (various purposes), protection/preservation of archaeological and historical O'odham sites, coordinated management of archaeological sites that overlap the monument-Tohono O'odham Nation boundary, and an overarching concern about the impacts of encroaching development.

3. Information on activities occurring during the **5 years prior to designation**

- a) Recreation - annual visits to site
 - i. No estimates of recreation use were made prior to designation. A recreation study completed shortly after monument designation indicated approximately 10,000 annual visits for various dispersed recreational activities (OHV driving for pleasure, hunting, sightseeing, hiking, camping).
- b) Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any)
 - i. No coal, oil, gas, or renewable energy production occurred on the site during the five years prior to designation.
 - ii. All existing energy transmission infrastructure was developed prior to designation, including a total of 76.1 miles of right of way.
- c) Minerals - annual mineral production on site
 - i. Jenott Mining operated a 5-acre mineral material sale quarry on IFNM which ended production prior to monument designation. Reclamation was complete one year after designation.
 - ii. Prior to designation, a Mining Plan of Operation was required for active mining

- over 5 acres or more of unpatented claims.
- iii. The adjacent Silver Bell copper mine, on private land, was not impacted by activities on BLM land prior to designation. The Silver Bell mine was permitted by the Arizona State Mine Inspector.
- iv. The adjacent Pioneer Materials mineral materials quarry, on private land, was not impacted by activities on BLM land prior to designation. The main product is limestone aggregate. The Pioneer quarry was permitted by the Arizona State Mine Inspector.
- d) Timber - annual timber production on site (in board-feet, CCF, or similar measure)
 - i. No timber production occurred on IFNM in the 5 years prior to designation. The Sonoran Desert ecosystem has no timber resource nor provides timber products.
- e) Grazing - annual grazing on site (AUMs permitted and sold)
 - i. Designation did not change the number of AUMs permitted; 7,849 AUMs were permitted each of the five years prior to designation. The number of AUMs sold each year is at the lessee's discretion based on weather and forage production, with numbers being lower during drought years.
See tables located within this Drive: [2e.IFNM Billed AUMs](#), [2e.IFNM Permitted Active AUMs by Allotment as of 2017-5-23](#)
- f) Subsistence - participation rates for subsistence activities occurring on site (fishing, hunting, gathering); quantities harvested; other quantifiable information where available
 - i. No subsistence activities have occurred on the IFNM since designation. There are no formal subsistence outside of Alaska. IFNM does provide for the collection of certain natural materials by Native American Indians. There have never been sport fish on the IFNM. The terms of the Proclamation ("The establishment of this monument is subject to valid existing rights. 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.") state that regulation of hunting and fishing in the monument remains with the State.
 - ii. Arizona Game and Fish Department does not measure hunting participation rates for the IFNM separate from the remainder of the Game Management Unit in which the monument is located.
- g) Cultural - list of cultural uses/values for site; number of sites; other quantifiable information where available
 - i. In the five-year period prior to monument designation, approximately 8,000 acres of BLM-administered land that later became the monument had been inventoried for cultural resources. These surveys were primarily conducted in support of BLM-permitted activities associated with grazing, mining, and/or utility line construction projects.

(b) (5)

5. Changes to boundaries - dates and changes in size

- i. The IFNM boundary encompasses 188,628 acres of land; this number of acres has not changed since designation. At designation, 128,398 of these acres were BLM-administered. The balance of the land consisted of approximately 54,700 acres of State Trust land (administered by the Arizona State Land Department [ASLD]) and approximately 6,000 acres of privately owned land, and a 299-acre Department of Defense withdrawal. The decisions in the Approved RMP (2012) currently apply to approximately 129,358 acres within the monument boundaries which is public land administered by the BLM.
- ii. There have been no changes to the monument boundary since monument designation. Acquisitions since designation have all been private land within the boundaries of the monument, from willing sellers.
- iii. In 2014, the BLM acquired 358 acres of private land within the monument from willing sellers, with the assistance of Land and Water Conservation Funds and

the Arizona Land and Water Trust. The majority of the acreage was patented mining claims in the Waterman Mountains in habitat for the Endangered Nichol Turks-head cactus, and containing a major bat roost.

- iv. In 2016, the BLM acquired 602 acres of private land within the monument from willing sellers, with the assistance of Land and Water Conservation Funds and the Arizona Land and Water Trust.

6. Public Outreach prior to Designation - outreach activities conducted and opportunities for public comment

- i. BLM conducted no public outreach activities prior to designation. Monument designation was a citizen's proposal.
- ii. The Board of Supervisors of Pima County, Arizona, proposed the establishment of an "Ironwood Preserve" and signed Resolution 2000-63 "Request(ing) that the United States of America through the Secretary of the Department of the Interior, consistent with the Sonoran Desert Conservation Plan, work cooperatively with Pima County to establish the Ragged Top and Silverbell Ironwood Preserve in the Silverbell Mountains." in March of 2000.

7. Terms of Designation

- i. The terms of designation are from the Presidential Proclamation 7320- Establishment of the Ironwood Forest National Monument, June 9, 2000, which is located within this Drive ([1d.IFNM proclamation](#)):

Executive Summary of Review of National Monuments under EO 13792 (April 26, 2017)

Key Information about Ironwood Forest National Monument

Ironwood Forest National Monument (IFNM) was established by Presidential Proclamation 7320 on June 9, 2000. Prior to designation, the area was managed by the BLM and continues to be following designation. The Proclamation designated “approximately 128,917 acres” and states that acreage is “the smallest area compatible with the proper care and management of the objects to be protected.” The BLM manages for multiple use within the Monument (hunting, recreation, grazing, and valid existing rights such as mining claims, etc.), while protecting the vast array of historic and scientific resources identified in the Proclamation and providing opportunities for scientific study of those resources. The resources identified in the Proclamation include biological, geological and archaeological objects. Overall, multiple use activities are allowed in Ironwood Forest National Monument that are compatible with the protection of resources and objects identified in the Presidential Proclamation. Multiple use activities are subject to decisions made in current and future BLM resource management planning efforts which include public participation. National Monuments and other conservation areas managed by the BLM continue to allow for multiple uses according to the Federal Land Policy and Management Act (depending on proclamation language).

Summary of Public Engagement Prior to Designation

The BLM conducted no public outreach activities prior to designation. Monument designation was a citizen’s proposal. The Board of Supervisors of Pima County, Arizona, proposed the establishment of an “Ironwood Preserve” and signed Resolution 2000-63 “Request(ing) that the United States of America through the Secretary of the Department of the Interior, consistent with the Sonoran Desert Conservation Plan, work cooperatively with Pima County to establish the Ragged Top and Silverbell Ironwood Preserve in the Silverbell Mountains.” in March of 2000.

Summary of Public Scoping in Development of Resource Management Plan

The BLM engaged in a collaborative planning process in developing the RMP. The BLM conducted public informational meetings August 2000 - March 2002. Working groups for Lands and Minerals, Vegetation, Wildlife, Recreation, and Cultural Resources were established to identify, define, and articulate issues that would need to be addressed in the RMP. Public scoping was initiated on April 24, 2002, followed by informal scoping at community meetings, special interest group meetings, and coordination with elected representatives. The BLM conducted nine public scoping meetings in an open house format during July 2002, in the Arizona communities of Mesa, Casa Grande, Eloy, Arizona City, Tucson, Sells, Picture Rock, Marana, and Green Valley. A Spanish-speaking BLM employee attended each of these meetings to provide translation. Media releases were sent to over 400 addresses, and releases and Public Service Announcements went to more than 23 newspapers, television and radio stations.

Summary of National Monument Activities since Designation

Included below is a summary of monument activities since designation:

- Recreation use has increased from 15,900 visits in 2001 to 23,600 visits in 2016. No production of coal, oil, gas or renewable energy has occurred since designation.
- The amount of energy transmission infrastructure (76.1 miles of right of way) has not changed since designation.
- Since monument designation, no mineral production has occurred.
- No timber production occurred since designation. No timber resource is present.
- The number of AUMs permitted (7,849) has not changed since designation. The number of AUMs sold each year is at the lessee's discretion based on weather and forage production, with numbers being lower during drought years.
- Native American Indians collect some natural materials; no permit is required.
- Sport fish do not exist on the IFNM. Regulation of hunting remains with the State.
- Approximately 12.5 percent of BLM-administered lands within the monument has been inventoried for cultural resources. The number of known and/or documented cultural resources sites has doubled since monument designation. 310 sites have been documented, with an average density of approximately 11 cultural resources sites per square mile. Projected total estimate is 3,000 to 6,000 sites likely to exist across the entirety of the monument.

Summary of Activities in Area for Five years Preceding Pre-Designation

Included below is a summary of monument activities five years preceding designation:

- No estimates of recreation use were made prior to designation. A recreation study completed shortly after monument designation indicated approximately 10,000 annual visits.
- No coal, oil, gas, or renewable energy production occurred on the site during the five years prior to designation.
- All existing energy transmission infrastructure was developed prior to designation, including a total of 76.1 miles of right of way.
- A small mineral material sale (decorative rock) quarry was operating prior to designation. No other mining operations or mineral production occurred on federal lands during the five years prior to designation.
- No timber production occurred on IFNM in the five years prior to designation.
- Designation did not change the number of AUMs permitted; 7,849 AUMs were permitted each of the five years prior to designation. The number of AUMs sold each year was at the lessee's discretion based on weather and forage production, with numbers being lower during drought years.
- In the five-year period prior to monument designation, approximately 8,000 acres had been inventoried for cultural resources, and approximately 150 sites had been documented. The surveys were primarily conducted in support of BLM-permitted activities associated with grazing, mining, and/or utility line construction projects.

Summary of Available Economic Information since Designation

According to the Bureau of Land Management's economic analysis for FY2016, total visitor spending at IFNM was \$1,401,970 and average expenditures per visit was \$59.41. The total non-BLM jobs supported by the Monument is 21 with a total labor income supported of \$726,234. This resulted in a total economic output supported by the Monument of \$1,995,362. An economic snapshot summarizing economic information is located within this drive ([Ironwood Forest NM-Economic snapshot.pdf](#))

Summary of Any Boundary Adjustments since Designation

The IFNM boundary encompasses 188,628 acres of land; this number of acres, and the configuration of the boundary, have not changed since designation. Acquisitions from willing sellers of private land within the monument boundary added 358 acres in 2014 and 602 acres in 2016, bringing the BLM-administered acres from 128,398 at monument designation to 129,358.

June 2, 2017
New Information Requested on Executive Order on the Review
of Designations Under the Antiquities Act

BLM Responses to Additional Questions for Ironwood Forest National Monument

- a) Any legislative language, including legislation in appropriations bills

None.

- b) (b) (5) [REDACTED]
- [REDACTED]

- b) Designated wilderness areas (name, acreage), wilderness study areas (name if there is one, acreage, type), and/or areas managed to preserve wilderness or roadless characteristics that are not WSAs.

There are no designated wilderness areas, or wilderness study areas. Approximately 9,510 acres were identified in the RMP to preserve wilderness characteristics.

- c) Outstanding R.S. 2477 claims within a monument – type of road claimed and history
There are no outstanding R.S. 2477 claims within the monument.

- d) Maps

A map of the IFNM is located within this drive ([Additional Information d.ifnm_map.jpg](#)).

- e) (b) (5) [REDACTED]

(b) (5)



g) Other – general questions or comments

- i. Monument designation was initiated and supported by the local community, which led to formation of the Friends of Ironwood Forest, a non-profit friends group to assist BLM with education, interpretive programs, and outreach.
- ii. The local community support led to increased numbers of volunteers, which allowed the BLM to implement clean up, resource protection, and stewardship education efforts that would not have occurred without monument designation.
- iii. The monument is located in the international border zone. Monument designation brought attention to public safety concerns (to visitors and to neighboring residents) and resource damage due to the high volume of illegal smuggling on the IFNM. As a result, the BLM was allocated funding specifically to mitigate resource impacts and to provide intensive law enforcement operations.