



Coalition for Sonoran Desert Protection

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July 10, 2017

Arizona Center for Law in
the Public Interest

Arizona Native Plant
Society

Bat Conservation
International

Cascabel Conservation
Association

Center for Biological
Diversity

Center for Environmental
Ethics

Defenders of Wildlife
Desert Watch

Environmental Law
Society

Friends of Cabeza Prieta

Friends of Ironwood Forest

Friends of Madera Canyon

Friends of Saguaro
National Park

Friends of Tortolita

Gates Pass Area
Neighborhood
Association

Genius Loci Foundation
Native Seeds / SEARCH

Protect Land and
Neighborhoods

Safford Peak Watershed
Education Team

Save the Scenic Santa Ritas

Sierra Club – Grand
Canyon Chapter

Sierra Club – Rincon Group

Sky Island Alliance

Society for Ecological
Restoration

Southwestern Biological
Institute

Tortolita Homeowners
Association

Tucson Audubon Society

Tucson Herpetological
Society

Tucson Mountains
Association

Wildlands Network

Review, MS–1530
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

[Docket No. DOI–2017–0002]

Review of Certain National Monuments Established Since 1996 Public Comment Re: Ironwood Forest National Monument

Dear Secretary Zinke,

We submit the enclosed comments on behalf of the Coalition for Sonoran Desert Protection, founded in 1998 and comprised of 30 environmental and community groups working in Pima County, Arizona and representing over 30,000 people. Our mission is to achieve the long-term conservation of biological diversity and ecological function of the Sonoran Desert through comprehensive land-use planning, with primary emphasis on Pima County's Sonoran Desert Conservation Plan. We achieve this mission by advocating for: 1) protection and conservation of Pima County's most biologically rich areas, 2) direction of development to appropriate land, and 3) appropriate mitigation for impacts to habitat and wildlife species.

One of the first public processes that the Coalition for Sonoran Desert Protection was involved with after our founding in 1998 was the proposal for a national monument northwest of Tucson. This proposal, or more accurately, proposals of varying size, were broadly supported by the public and by elected county, municipal, and tribal boards.

The establishment of Ironwood Forest National Monument (IFNM) was initially proposed by a neighborhood group that resided in private in-holdings that are now within the monument's boundary. This occurred in the context of developing Pima County's Sonoran Desert Conservation Plan, a regional conservation process that began in 1998 and continues to this day. Development of the conservation plan and of local proposals for IFNM were the products of extensive outreach and planning that involved landowners, homebuilders, ranchers, realtors, conservationists, neighborhood organizations, scientists and cultural resource experts, as well as the Tohono O'odham Nation.

The Coalition for Sonoran Desert Protection continues to strongly support the national monument designation for Ironwood Forest. This is rooted in strong public support and adherence to criteria contained in the Antiquities Act. Lands incorporated into IFNM under the Antiquities Act contain "historic landmarks, historic and prehistoric structures, [or] other objects of historic or scientific interest."

The Coalition endorses the detailed comments submitted to you from the National Parks Conservation Association. As such, we are including excerpts from their letter, below:

History and broad public support for IFNM

The impetus for the habitat conservation planning effort was the 1997 federal endangered listing of the cactus ferruginous pygmy-owl, a local subspecies that depends largely on ironwood habitat. As such, an initial Pima County proposal for a preserve grew out of the research on ironwood habitat encapsulated in the *Desert Ironwood Primer*, a report issued in February 2000 by the Arizona-Sonora Desert Museum. This report put forward recommendations for conservation based on a decade of study, and was one of the research products developed in conjunction with Pima County's regional conservation planning effort. The recommendations stemming from the information compiled in the *Primer* included protection of areas of highest-density ironwood and protection of a corridor of "stepping stone reserves" within ironwood habitats for the benefit of species such as the pygmy-owl. The recommendations also included protection of ironwood in wash, rocky slope, and valley/plains habitats. The proposal for the preserve identified Ragged Top (in the central portion of IFNM) and Cocoraque Rock (in the southeastern corner) as priorities due to their significance for biodiversity conservation.

On March 21, 2000, the Board of Supervisors unanimously passed a resolution referring to the ironwood forest as "a quiet but enormously important protector of species diversity within the Sonoran Desert" and requesting that the federal government work with the County in a manner consistent with the Sonoran Desert Conservation Plan to establish a preserve.

Meanwhile, the Coalition for Sonoran Desert Protection and others proposed the inclusion of additional lands in the monument beyond what Pima County proposed, and beyond what was eventually included in the proclamation. The Coalition's proposal, called the "Morris K. Udall Ironwood Forest-Upland Corridor National Monument," included nine "physically distinct but biologically connected units" in Pima County as well as lands in Pinal County to the north. These additional areas were proposed to protect ironwoods and other important species and to allow the recovery of the cactus ferruginous pygmy-owl.

The Silverbell Mountains area, in combination with the Sawtooth Mountains in Pinal County (eventually incorporated into IFNM), was one of those key habitat areas, as were other areas in Pinal County that the conservationists proposed for inclusion in the monument designation. The Nature Conservancy, in a letter to the Department of the Interior, emphasized the importance of the Sawtooth-Silverbell site to the Sonoran Desert Ecoregion and commended the Coalition's proposal for its accurate reflection of the distribution of species, including important corridors for bighorn sheep, and avoidance of areas already developed.

The more extensive monument proposed by conservation groups received enthusiastic support from the Pinal County Board of Supervisors, which sent a letter to Secretary Babbitt endorsing it. In the days leading up to the designation, the Tohono O'odham Nation also expressed support for the more expansive proposal. The Chairman of the Tohono O'odham Nation wrote to Secretary Babbitt that each of the proposed units contained "cultural artifacts and wildlife which hold tremendous significance to the Tohono O'odham" that would only receive necessary protection through monument designation. The Chairman of the San Xavier District of the Tohono O'odham Nation wrote of the necessity of protecting sites of cultural and spiritual significance as well as movement corridors and larger areas for plants and animals "to preserve the sacred maze of life."

On June 9, 2000, President Clinton issued Proclamation 7320 designating IFNM. As designated, IFNM is a contiguous serpentine area that encompasses the important ironwood habitats recommended for inclusion in the preserve based on research compiled in the *Desert Ironwood Primer*. While it excluded biologically-connected but non-contiguous units identified in the Coalition's larger proposal, it did include the Sawtooth Mountains.

After the Bush administration took office, Pima County officials reiterated to his Secretary of the Interior, Gale Norton, that IFNM had emerged "only after numerous meetings with private property owners, ranchers, and other interests, all of whom supported the designation." The officials wrote that to their knowledge, the only group that had opposed the monument's designation was a mining interest.

Ongoing public support, management, and economic benefits

A year after the designation, a public opinion poll found overwhelming support for new national monuments in Arizona and IFNM in particular. Regarding IFNM, 79% of the respondents opposed a mining company's plan to remove some of the lands from IFNM. More generally, 75% of respondents believed that public lands in Arizona that have unique or special features should be protected from logging, mining, road building, and off-road vehicle use.

In recent years, BLM has acquired private inholdings within IFNM using federal funds from the Land and Water Conservation Fund, including 602 acres (a patented homestead in the Silverbell Mountains) in 2016 and 358 acres in 2014 that included habitat for the endangered Nichol Turk's head cactus and a cave serving as a major bat roost.

Today, Ironwood Forest National Monument retains widespread local support and yields economic as well as cultural and scientific benefits to the surrounding communities. On May 16, 2017, the Pima County Board of Supervisors confirmed this in a resolution expressing support for the Antiquities Act and other national monuments in general, and for IFNM in particular. In the resolution, the Board praised the economic benefits from the recreational use of public lands such as IFNM, and noted that travel and tourism accounted for \$2.24 billion in direct spending in Pima County in 2015, as well as for 24,060 jobs, \$115.4 million in state tax revenue, and \$81.9 million in local tax revenue. The Board attributed these benefits at least in part to IFNM, and concluded that the elimination or reduction of IFNM would likewise reduce these benefits.

Important biological resources

Flora

IFNM was named after the ironwood tree because ironwood trees in the area of the monument have more "ecological associates," i.e., provide a better example of ironwood's ability to modify and enrich its habitat, than in any other place where this has been investigated. This is documented in the *Desert Ironwood Primer*. The report compiled previously published literature on ironwood ecology and analyzed data from almost 150 new study areas. The *Desert Ironwood Primer* documented the ecological and cultural importance of the ironwood forest as well as threats to ironwood habitat due to fragmentation resulting from rapid growth of cities, conversion to agricultural land and other factors.

The *Primer* identified Ragged Top (on the boundary of Pima and Pinal Counties in the central part of

IFNM) and the Cocoraque Rock area (in the southeast portion of IFNM) as the cornerstones of the preserve, capable of providing “a regional reserve network to protect the biodiversity associated with ironwood habitats in the Sonoran Desert.” Other areas ultimately incorporated into IFNM provide necessary buffers and corridors around Ragged Top and Cocoraque Rock, as well as “undoubtedly deserv[ing] further study and protection” on their own merits.

The Desert Museum’s post-designation study also documented and mapped the other significant biological elements that IFNM protects, demonstrating that important and varied biological resources are found throughout the lands within IFNM. These include extensive areas of the Arizona Upland subdivision of the Sonoran Desert with dense groves of ironwoods as well as above-average densities of saguaro and foothill palo verde. The Desert Museum survey indicated that saguaro densities in some parts of IFNM approach the densities in Saguaro National Park, “which has the most luxuriant saguaro forests that we know of.” The desert washes within IFNM’s boundaries—which are “highly vulnerable to human disturbance”—serve important ecological functions and provide dispersal corridors for animals and plants. Other important flora documented in IFNM include dense stands of cholla cactus and an area of cactus dunes west of the Sawtooth Mountains. The Desert Museum survey’s authors indicated that they were aware of only one similar area of cactus dunes, and that this other area’s plant and cactus density and diversity were much lower than in the IFNM cactus dune area.

The flora documented in the Desert Museum survey comprised 560 taxa, including 271 taxa that were uncommon, rare, or of limited distribution. Researchers have continued to discover additional taxa, and by 2015 the documented flora included 593 taxa. One plant species—the Nichol Turk’s head cactus—is listed as endangered under the federal Endangered Species Act and is known from only three locations in the world. In the IFNM, however, there are 2,240 acres of Nichol Turk’s head habitat within public land in the Waterman Mountains.

IFNM protects and preserves floral diversity in other ways as well. For example, it is the sole U.S. home for Mexican devil’s claw (on Ragged Top), false grama, and vainoro, and it is home for a number of other plant species protected under Arizona law. This diversity is not just of scientific interest; IFNM also has areas of reliable “and sometimes spectacular” wildflower blooms in the Silverbell, Waterman, and Roskruge ranges.

Each different part of IFNM contributes to this diversity by contributing habitats and microhabitats not found in other areas in the monument, or found only in limited amounts. For example, 76 IFNM taxa were found only on Ragged Top and nowhere else, and 20 IFNM taxa were found only in the Sawtooth Mountains.

In summary, although IFNM is much more than just its flora, this flora by itself would justify designation as a monument. IFNM holds exemplar assemblages of several floral communities in addition to those of the ironwood. IFNM’s floral assemblages also comprise a remarkable diversity of species fostered by IFNM’s topographic, geological, and biological microhabitats, including species endangered and protected under federal and state law as well as species known from nowhere else in the U.S. These assemblages have special scientific value because they are relatively pristine, with only limited encroachment by exotic invaders.

Wildlife

IFNM provides crucial habitat for an array of animal species. One of these, the endangered lesser long-nosed bat—a nectar-feeding bat that migrates from Mexico to establish maternity colonies and give birth to their young—is believed to make use of IFNM as foraging grounds or as a stopover during its migration along “nectar corridors” populated by their food plants such as the saguaro. IFNM also contains historic and potential habitat for the cactus ferruginous pygmy-owl, as well as habitat for the Sonoran desert tortoise and Tucson shovel-nosed snake.

The management area for desert bighorn sheep covers a broad sweep of IFNM territory, and the IFNM population of desert bighorns may be the last viable population indigenous to the Tucson basin. In 2016, however, two desert bighorns appeared for the first time in 60 years in Saguaro National Park, just across the Avra Valley from IFNM, and it was determined they came from IFNM. IFNM is part of a regional habitat network that is allowing the desert bighorns to re-colonize their historic domain.

Antiquities Act

IFNM easily meets the requirements and original objectives of the Antiquities Act that reservations of land not exceed “the smallest area compatible with the proper care and management of the objects to be protected.” Indeed, as the binational report referenced above shows, the weight of scientific evidence establishes that IFNM is, if anything, not large enough. It is in keeping with the Antiquities Act that IFNM’s landscape and the resources it hosts be considered in its entirety and at a landscape scale, in order for IFNM’s historic and scientific objects to receive “proper care and management.”

Uses of designated Federal lands

One area in which you seek comments is “the effects of a designation on the available uses of designated Federal lands.” The federal lands within IFNM’s perimeter are open to a wide variety of compatible uses. Recreational uses include desert touring on improved roads for viewing the natural and cultural landscape as well as desert touring on semi-primitive routes using off-highway vehicles. Hiking, horseback riding, biking, camping, and wildlife viewing are also available, and hunting is permitted in accordance with Arizona hunting regulations. Grazing has continued to be a permitted use within IFNM consistent with the longstanding historical use of the area. As noted earlier in this letter, IFNM also is a venue for scientific research efforts across multiple disciplines.

Public use

Visits to IFNM have increased substantially since its designation. A 2004 report on IFNM access and visitor use indicated that approximately 12,000 to 15,000 visitors travelled through IFNM annually. In the 2014 fiscal year, an estimated 47,000 people visited IFNM, and in fiscal year 2016, an estimated 23,600 visited. Non-profit organization such as Friends of Ironwood Forest, Sierra Club, and Arizona Native Plant Society-Tucson Chapter partner with BLM on recreational and education events, as well as on efforts to control invasive species such as buffelgrass.

In conclusion, the Coalition for Sonoran Desert Protection urges the administration to maintain the current protections of the Ironwood Forest National Monument. We believe that your office should provide the leadership necessary to continue the protections that decades of study have shown IFNM’s biological, geological and cultural treasures so manifestly deserve.

Local governments, environmental organizations, ranchers, and the Tohono O’odham Nation all endorse the preservation of these quintessential Sonoran Desert resources and the cultural, scientific,

and economic benefits they provide. Ironwood Forest National Monument is a unique, rich desert landscape worthy of its current designation and wholly in keeping with the intention and written purpose of the Antiquities Act.

Thank you for your consideration of these comments. **We call on your administration to maintain and support all of our country's national monuments, including the Ironwood Forest National Monument, in order to help heal and protect these ancestral lands while leaving a lasting legacy for all Americans.**

Sincerely,

A handwritten signature in black ink that reads "Carolyn Campbell". The signature is written in a cursive style with a large, prominent 'C' at the beginning.

Carolyn Campbell, Director