

# SCOPING REPORT

## Ironwood Forest National Monument Resource Management Plan and Environmental Impact Statement



Prepared for  
**U.S. Department of the Interior**  
Bureau of Land Management  
Tucson Field Office

Prepared by  
**URS**

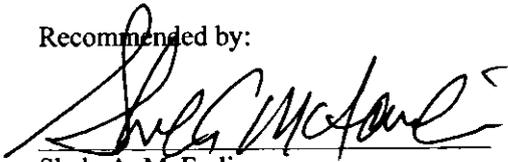


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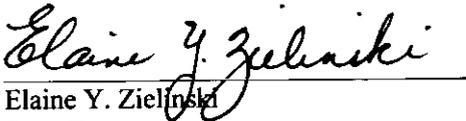


Shela A. McFarlin  
Tucson Field Manager

Date:

2/12/04

Approved by:



Elaine Y. Zielinski  
State Director

Date:

2/12/04

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## LIST OF ACRONYMS AND ABBREVIATIONS

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ACEC	Area of Critical Environmental Concern
ADEQ	Arizona Department of Environmental Quality
ADWR	Arizona Department of Water Resources
AGFD	Arizona Game and Fish Department
ATV	All-terrain vehicle
AUM	Animal Unit Months
AZSDM	Arizona Sonora Desert Museum
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
EIS	Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act
GIS	Geographic Information System
GPS	Global Positioning System
IFNM	Ironwood Forest National Monument
LUP	Land Use Plan
MOU	Memorandum of Understanding
NEPA	National Environmental Policy Act
OHV	Off-highway vehicle
ORV	Off-road vehicle
RMP	Resource Management Plan
SHPO	State Historic Preservation Office
TFO	Tucson Field Office
TON	Tohono O’odham Nation
USFWS	U.S. Fish and Wildlife Service
U of A	University of Arizona
USGS	United States Geological Survey
WSA	Wilderness Study Area

## SECTION 1.0 – INTRODUCTION

---

### 1.1 Overview

The Bureau of Land Management (BLM), Tucson Field Office (TFO), is preparing a Resource Management Plan (RMP) and Environmental Impact Statement (EIS) to analyze BLM's management of public land in the Ironwood Forest National Monument (IFNM) in Arizona (Map 1). The IFNM, which was established on June 9, 2000 with the signing of Presidential Proclamation 7320 (see Appendix A), encompasses approximately 189,600 acres, including approximately 128,900 acres of public land administered by the BLM.

An EIS is being prepared to identify the potential effects of implementing the alternative management approaches within the IFNM and to identify appropriate measures to mitigate potential impacts. The EIS will be prepared in compliance with the National Environmental Policy Act (NEPA) of 1969, Council on Environmental Quality regulations implementing NEPA, the Federal Land Policy and Management Act (FLPMA) of 1976, and other associated regulations. Together, the RMP and EIS will analyze and establish BLM's management practices for these lands in response to the Presidential Proclamation, current legislation and policies, and the demand to use public land and its resources.

#### 1.1.1 Background

BLM-administered public land in the IFNM currently is managed with direction from the Phoenix Resource Area RMP (1989) and the Eastern Arizona Grazing EIS (1987). The purpose of these documents was to provide a comprehensive framework for managing the public land and for allocating resources over a planning period of 15 to 20 years. These documents set forth land use decisions and terms and conditions for guiding the management of activities on public land. Also, wildlife habitat plans, such as the Silverbell Habitat Management Plan, and allotment management plans provided specific management direction and actions for wildlife and range programs on lands within or immediately adjacent to the IFNM. While BLM can make decisions related only to public land and its resources, BLM is responsible for collaboratively planning with adjacent jurisdictions and the public to encourage compatible land uses within a regional context.

Since the Phoenix Resource Area RMP and Eastern Arizona Grazing EIS were developed, numerous changes have occurred that require reconsideration of certain decisions, most significantly the establishment of IFNM for the protection of natural and cultural resources. In addition to the IFNM designation, changes have occurred to land and resource use, including continued urban growth in the Tucson and Marana metropolitan area and surrounding communities, and increased recreational use of BLM-administered public lands.

While some elements of the current management documents are consistent with the Presidential Proclamation establishing the monument and provide appropriate management direction, other elements need revising. Many elements of the current management documents for the area are outdated based on changing circumstances, demographics, resource conditions, and/or policies, or are not consistent with the Presidential Proclamation. BLM intends to carry forward those elements that are working well.

There are many factors to consider in developing the RMP. For example, population growth in the region has increased recreational uses of public land. The Presidential Proclamation establishing the national monument assigns BLM with the responsibility to protect the special qualities for which the monument was designated, while continuing to allow public access within the monument. Factors such as these emphasize the importance of replacing the existing management documents with a plan that addresses the current issues.

BLM is responsible for balanced management of public lands and resources considered in a combination that will serve the needs of the public most effectively. In accordance with FLPMA, management is based on the principles of multiple use and sustained yield; this integration of uses takes into account the long-term needs of present and future generations for renewable and nonrenewable resources. For the IFNM, this planning process also must take into consideration Presidential Proclamation 7320, which defines for IFNM “objects of scientific and historic interest” that must be protected and lists actions necessary to protect IFNM resources. The Presidential Proclamation also reserves all federal lands within the boundaries and withdraws all lands in the IFNM from disposal under public land laws and continues many current uses and authorities. BLM is developing the RMP/EIS to be consistent with current laws and regulations, and is encouraging the public to be involved in the development of the RMP and the planning process for public lands in the IFNM.

Integral to the planning and environmental process is the public participation program, which keeps relevant agencies and the interested public engaged in the project’s progress. Opportunities for public participation include scoping, public meetings and workshops, focus group discussions, project mailings, and hearings. Some of these opportunities have occurred (e.g., scoping), while others will occur at key milestones throughout the process.

## **1.2 Planning Area**

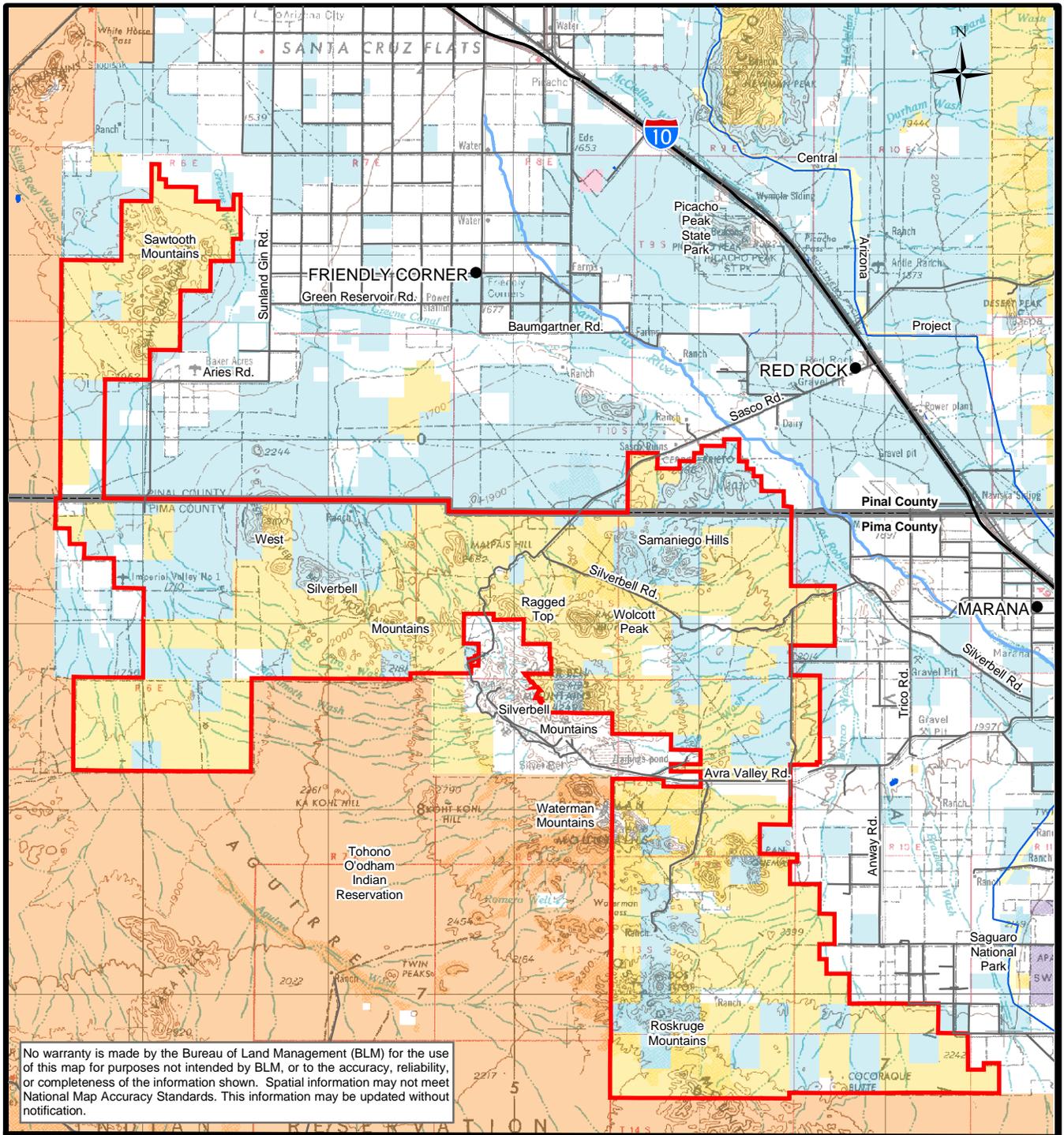
### **1.2.1 Location**

The IFNM is located in south-central Arizona (refer to Map 1). The entire study area in which these BLM-administered lands are located covers approximately 189,600 acres; this is referred to as the Planning Area. Approximately 128,900 acres within the monument boundaries are BLM-administered public land. The balance of the land consists of approximately 54,700 acres of State Trust Land and approximately 6,000 acres that are privately owned. In addition, other agencies may have management responsibilities within the Planning Area; for example, the Arizona Game and Fish Department (AGFD) is responsible for managing wildlife for the state and the Arizona State Land Department holds and manages State Trust Lands. The Tohono O’odham Nation generally lies to the west and south of the IFNM, and a mosaic of BLM, state, and private land abuts the northern and eastern monument boundaries.

### **1.2.2 Description**

The IFNM lies in the heart of the Sonoran Desert ecosystem in southern Arizona, and is a unique scenic area of rolling desert and ironwood woodlands including the Silverbell, Waterman, and Roskrige mountains. Much of the vegetation in this area is classic Sonoran Desert upland habitat dominated by cacti such as saguaro, Bigelow’s cholla, and staghorn cholla. Other common plants include ironwood, paloverde, creosote, brittlebush, triangle-leaf bursage, ocotillo, and white thorn acacia. The upper slopes of the Silverbell Mountains possess a chaparral community dominated by jojoba. The lower bajadas contain inter-braided streambeds that carry water after heavy rains. These desert wash habitats are characterized by large ironwood, blue paloverde, and mesquite trees.

The IFNM encompasses most of the mountain ranges that are important to the diverse wildlife and plant communities associated with the ironwood/saguaro forest. In addition, the IFNM contains habitats for several endangered species and species of concern (e.g., desert tortoise), an Area of Critical Environmental Concern (ACEC) to protect an endangered cactus, and a desert bighorn sheep special management area. IFNM also includes a site listed on the National Register of Historic Places (National



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**Legend**

**Planning Area**

- Ironwood Forest National Monument Planning Area

**Surface Ownership**

- Bureau of Land Management
- National Park Service
- Bureau of Reclamation
- Indian Lands
- Military Reservations
- State
- Private

**General Reference**

- County Boundaries
- Interstate
- Roads
- Railroad
- Rivers

Universal Transverse Mercator  
 Zone 12, Units Meters  
 Clark 1866 Spheroid  
 NAD27 Datum

**Ironwood Forest National Monument Planning Area**



Register), two archaeological districts on the National Register, historic mining camps, and other cultural resources that are eligible for the National Register.

Located along the Tohono O'odham Nation boundary, within an hour of the rapidly growing Tucson metropolitan area, the IFNM offers outstanding dispersed recreational opportunities. The area also is readily accessible from the Phoenix metropolitan area. Access is provided by dirt and paved roads connecting with Interstate 10. In addition to the nearby metropolitan areas and connecting roadways, human modifications within and visible from the IFNM include electrical transmission lines, pipeline facilities, mining operations, fences, and other infrastructure associated with developed areas.

### **1.3 Collaborative Planning**

Collaboration may be used to describe a wide range of external and internal working relationships. According to BLM Handbook H-1601-1, Appendix B, collaboration implies that other federal agencies; tribal, state and local governments; and various members of the public will be involved in the project well before the planning process is officially initiated, rather than at specific points mandated by regulation and policy (BLM 2002). The collaborative process essentially allows the community to communicate to the BLM how public lands should be managed from the public's perspective. The final goal of the process should be that the communities and agencies work together toward a common understanding on the future management of the public lands.

Agency coordination is an important step in a successful collaborative process for several reasons. First, early involvement with other federal, tribal, state, and local governments establishes a solid working relationship with each agency. Next, it builds trust and credibility among agencies that then can be transferred to the public. Finally, it will help ensure BLM develops land use decisions that are supported by and conform to other jurisdictions in any given area to the maximum extent possible.

Similarly, active involvement by the public early in the process helps to ensure alternatives are considered that:

- address the diversity of public interests
- builds trust between BLM and the public
- creates public understanding and acceptance of the eventual management decisions
- develops a working relationship that will carry into the shared implementation of those management decisions.

After the monument was designated, the BLM Tucson Field Office established a collaborative process to build a solid foundation of community trust and respect as the RMP is prepared. Collaborative efforts, such as the Asarco Working Group and volunteer projects, have already supported the BLM in accomplishing its mission and will remain important in fostering continued community support for the plan and its implementation.

#### **1.3.1 Cooperating Agencies**

As a part of initiating multiple planning efforts throughout the state, BLM compiled a list of federal, state, county, and local agencies and Native American tribes that may have a relevant interest in the planning process. A letter was sent to more than 200 agencies to introduce the various RMP/EIS processes, identify the upcoming data gathering efforts, and offer an opportunity to become a cooperating agency in the planning effort. A cooperating agency meeting was held at the BLM Arizona State Office on October 30, 2002. The purpose of the meeting was to discuss BLM's planning process, collaborative

planning, and the meaning and responsibilities of cooperating agency status. Opportunities for involvement in BLM's planning process without becoming a cooperating agency also were discussed. It was made clear that BLM's goal was to encourage involvement by all interested parties using whatever methods the parties wished.

AGFD already has an established Memorandum of Understanding (MOU) with the TFO and plans to use this agreement to work collaboratively with BLM on the IFNM. Pima and Pinal counties are currently reviewing an MOU to establish a cooperating agency relationship with the TFO. Also, the City of Marana has established a specific agreement with the BLM TFO to collaborate throughout the development of the RMP.

### **1.3.2 Agency Coordination**

Though no specific agency scoping meetings were held, BLM has contacted key federal, state, and county agencies to initiate coordination and collaborative efforts that will continue throughout the RMP/EIS process. As of the date of this report, contact has been made with the following agencies:

#### Federal

- Bureau of Indian Affairs, Phoenix Area Office
- Bureau of Reclamation, Arizona, Field Office
- Environmental Protection Agency
- Federal Highway Administration
- National Park Service, Organ Pipe Cactus National Monument, Juan Bautista de Anza National Historic Trail, and Saguaro National Park
- Natural Resources Conservation Service
- Southwest Strategy Coordination Office
- Borderlands Task Group (Interagency)
- U.S. Department of Agriculture, Rural Development, Arizona
- U.S. Department of Defense (Air Force, Marine Corps, Army Corps of Engineers, and National Guard)
- U.S. Department on Homeland Security, Border Patrol, Tucson Office Sector
- U.S. Fish and Wildlife Service, Cabeza Prieta National Wildlife Refuge
- U.S. Fish and Wildlife Services, Arizona Ecological Services
- U.S. Forest Service, Coronado National Forest
- U.S. Geological Survey

#### State

- Arizona Corporation Commission
- Arizona Department of Commerce
- Arizona Department of Emergency Management
- Arizona Department of Environmental Quality
- Arizona Department of Transportation
- Arizona Department of Water Resources
- Arizona Game and Fish Department
- Arizona Governor's Office
- Arizona Mines and Mineral Resources
- Arizona Office of Tourism
- Arizona Office of the Attorney General
- Arizona State Land Department

- Arizona State Mine Inspector
- Arizona State Parks
- State Historic Preservation Office
- State of Arizona

#### County

- Central Arizona Association of Governments
- Pinal County
- Pima County
- Graham County
- Apache County
- La Paz County
- Navajo County
- Cochise County
- Gila County
- Yuma County
- Greenlee County
- Mohave County
- Santa Cruz County

#### Local

- City of Tucson
- City of Marana
- City of Green Valley
- City of Casa Grande
- City of Mesa
- Town of Eloy
- Arizona City
- Town of Sells

Due to the limited response by agencies during the scoping process, BLM TFO has sent a follow-up letter to many of the agencies listed above to invite agency participation and to request data relevant to the IFNM planning process that may be available for BLM's use. Coordination meetings with these and additional agencies will continue throughout the planning process.

BLM also attends the monthly Tucson Basin Managers Meeting to provide briefings on the IFNM planning efforts. This group is comprised of various representatives from federal, state, county, and other local jurisdictions, as well as local environmental organizations. In addition, BLM has provided updates to the Middle Gila Conservation Partnership and the Winkleman Natural Resource Conservation District.

### **1.3.3 Tribal Consultation**

As previously described, multiple governmental organizations have management responsibilities for land or resources within the IFNM, and the IFNM abuts to tribal lands of the Tohono O'odham Nation (though the Tohono O'odham do not manage lands within the IFNM). As part of the scoping effort, BLM contacted the following tribes to initiate consultations and to reiterate the opportunity to be a cooperating agency in the planning process:

- Tohono O'odham Nation

- Gila River Indian Community
- Ak-Chin Indian Community
- Pasqua Yaqui Indian Community

Though the tribes want to participate in the planning process, they are not pursuing cooperating agency status at this time.

The Native American tribal representatives have attended most of BLM's public meetings and provided input on issues that concern them. A coordination meeting was held in January 2002 with the Tohono O'odham Nation, in which the tribe expressed a desire to gain ownership of BLM lands that are part of their ancestral lands, but outside the boundary of IFNM. The tribe also expressed interest in a formal relationship with BLM through an MOU that officially recognizes the Government-to-Government relationship in accordance with the three following Guidance documents: (1) Memorandum for the Heads of Executive Departments and Agencies dated April 29, 1994 entitled "Government to Government Relations with Native American Tribal Governments," (2) Executive Order 13175 of November 6, 2000 entitled "Consultation and Coordination with Indian Tribal Governments," and (3) Executive Order 13007 of May 24, 1996 entitled "Indian Sacred Sites." At other public meetings, the members of the Tohono O'odham tribe made the distinction that the IFNM is part of the tribe's ancestral homeland versus an area containing cultural resources. The tribe expressed further concern about preservation of the natural and cultural resources found on the IFNM.

BLM intends to continue to consult with the Native American tribes to learn more about the values they have with regard to the resources within IFNM. Through this Government-to-Government relationship, BLM can obtain data from interviews with tribal elders, tribal records on cultural resources, and relevant research.

#### **1.3.4 Public Interaction**

The BLM began conducting public informational meetings in August 2000 and continued holding meetings for almost two years until March 2002. The purpose of these meetings was to engage the community in dialogue to determine the future of how the public lands, specifically the monument, should be managed. This process has served to educate the public and agencies about sustaining natural and cultural resource values and the relationship of these resources to economic activities within the community.

These meetings were well attended by a diverse public that included several conservation and user groups as well as local, state, tribal, and federal agencies. During these meetings, the establishment of the monument and its future management were openly discussed. This forum served as a platform to build relationships between the community and BLM and, more importantly, allowed for the community to build relationships with each other. The formation of these relationships allowed the BLM to establish working groups to identify, define, and articulate issues that would need to be addressed in the RMP. These working groups included Lands and Minerals, Vegetation, Wildlife, Recreation, and Cultural Resources.

Public involvement remains critical to the success of the planning process. BLM has performed a variety of public outreach programs to increase awareness of and involvement in the planning process. These efforts have included presentations to community councils, business and social groups, and various organizations as well as public meetings. BLM now has several hundred individuals on its mailing list and the list is continuing to grow. The initial public involvement occurred prior to public scoping, as there was strong public support in establishing the monument and public interest in how the monument is going to be managed. BLM held working group meetings to discuss specific resources or issues with

interested parties. Public scoping for the IFNM planning was initiated on April 24, 2002 with the *Federal Register* publication of the Notice of Intent to prepare the RMP/EIS. Since public scoping, BLM has continued to have informal discussions with agencies, organizations, and individuals interested in the planning for IFNM. BLM also has attended various organized meetings as a guest to provide information regarding the IFNM RMP.

Initial public interaction occurred through BLM participation at community meetings, special interest group meetings, and coordination with elected representatives. BLM staff members were invited to speak at meetings held by environmental and recreation groups—including the Arizona-Sonora Desert Museum, Mason Audubon Center, and Coalition for Sonoran Desert Protection—and at meetings in the community of Marana. These informal meetings provided BLM with the opportunity to explain the planning process and timeline and to encourage citizen participation in the planning efforts. The initial public interactions included coordination with multiple special interest groups and non-profit organizations, including (but not limited to):

- Sierra Club
- Tucson Rough Riders
- Red Hills Neighborhood Association
- Center for Biological Diversity
- Coalition for Sonoran Desert Protection
- Desert Watch
- Mule Deer Foundation
- Arizona Desert Bighorn Sheep Society
- Arizona Wilderness Coalition
- Arizona Association of Four Wheel Drive Club
- Desert Gold Diggers
- Blue Ribbon Coalition
- Tucson Hiking Club
- Green Valley Hiking Club

BLM conducted nine public scoping meetings during July 2002. The open house scoping meetings were held in the Arizona communities of Mesa, Casa Grande, Eloy, Arizona City, Tucson, Sells, Picture Rock, Marana, and Green Valley. These meetings are discussed in more detail in Section 1.4.3.

BLM will continue to actively encourage public involvement through the formal planning process, informal community meetings, and other methods.

## **1.4 Scoping Process**

This section describes the scoping process, identifies the techniques that were used to notify the public about their opportunity to be involved in scoping, and gives a brief summary of the public scoping meetings.

### **1.4.1 Description of Process**

Scoping is a timeframe in a planning process when public and agency input is solicited in order to identify the range, or scope, of issues to be addressed during the planning and environmental analysis for a planning project (in this case, the IFNM RMP/EIS). The lead agency (in this case, BLM) solicits comments from relevant agencies and the public, organizes and analyzes all of the comments received, then identifies the issues that will be addressed during the planning and environmental analysis and

compiles this information into an organized report (the Scoping Report). A scoping period is required to be a minimum of 30 days beginning with the publication of a *Federal Register* notice. BLM TFO is encouraging comments at anytime throughout the planning process; however, comments received during scoping are particularly helpful to guide the direction of the studies and analyses. The official scoping period for the IFNM RMP/EIS lasted more than 30 days—from April 24, 2002 to September 30, 2002. Comments received within this period, as well as substantive comments received through August 1, 2003, were used to compile this scoping report.

BLM's intent during the scoping process was to inform agencies and the public about the IFNM RMP/EIS and solicit their comments in order to identify issues and questions to consider when developing the plan. During the scoping period, BLM announced the commencement of the RMP/EIS through various means, invited written comments, and held public scoping meetings. These activities are described below.

### **1.4.2 Announcements**

The RMP/EIS and scoping meetings were announced through the *Federal Register*, newspaper advertisements, the Arizona BLM website, and media releases.

#### *Federal Register*

The IFNM RMP/EIS and public scoping process began officially with the publication in the *Federal Register* of BLM's Notice of Intent to develop the RMP, prepare an EIS, and conduct public scoping meetings. The Notice of Intent to initiate planning on the IFNM was published on April 24, 2002 (Vol. 67, No. 79, Page 20157, [AZ-400-02-1610-DO-089A]).

#### Media Releases and Public Service Announcements

BLM prepared a media release and public service announcement to introduce the project and announce the scoping meetings and their respective locations. The announcement was issued in June and July 2002 to local and regional newspapers, television stations, and radio stations. The following list provides a representative sample of entities that received the media release:

#### **Newspapers**

- *Desert Times*
- *Monument News*
- *Saguaro News*
- *North Valley Chronicle*
- *Green Valley News* (south of Tucson)
- *Tri-Valley News*
- *Desert Leaf*
- *Arizona Daily Star*
- *Tucson Citizen*
- *Arizona Republic*

#### **Television Stations**

- KOLD
- KVOA
- KGUN
- KMSB

- KUAT
- KHRR

**Radio Stations**

- KNST FM
- KFMA FM (Green Valley)
- KUAT FM
- KUAZ AM
- KIIM FM
- KOHT FM (Marana)
- KWFM FM

In addition, this media release was mailed to approximately 400 addresses, which were derived from the lists of participants who attended the working group meetings hosted by BLM prior to public scoping.

Paid Newspaper Advertisements

BLM prepared a newspaper advertisement for the scoping meetings for each geographic location to introduce the project and announce the scoping meetings. Table 1-1 shows the date and publication of each paid newspaper advertisement.

**Table 1-1 – Paid Newspaper Advertisements and Date of Publication**

<b>Publication</b>	<b>Date</b>
Monument News	July 2002
Saguaro News	July 2002
Desert Times	July 2002
Casa Grande Dispatch	June 20, 2002
Arizona City Independent	June 19, 2002
Eloy Enterprise	June 27, 2002
Tucson Citizen	June 26, 2002
Arizona Daily Star	June 26, 2002
East Valley Tribune	June 19, 2002
Green Valley News	July 3, 2002
Ajo Copper News	July 3, 2002

Website

BLM posted a news release of the planning effort on the Arizona State Office website, and meetings were noted on the website calendar of events.

**1.4.3 Public Meetings**

BLM hosted nine public scoping meetings during July 2002 that were attended by 173 persons, as shown in Table 1-2.

**Table 1-2 - Public Scoping Meeting Dates, Locations, and Attendance**

<b>Meeting Date</b>	<b>Meeting Location</b>	<b>Attendance</b>
July 10, 2002	Mesa, Arizona	63
July 11, 2002	Casa Grande, Arizona	10
July 16, 2002	Picture Rock, Arizona	21
July 17, 2002	Tucson, Arizona	33

July 18, 2002	Marana, Arizona	22
July 23, 2002	Sells, Arizona	5
July 25, 2002	Arizona City, Arizona	8
July 30, 2002	Eloy, Arizona	1
July 31, 2002	Green Valley, Arizona	10

Each of the nine meetings was conducted in an open house format, allowing meeting participants to review maps and display boards and ask specific questions one-on-one to BLM staff about the RMP/EIS process.

The media release announcing the scoping meetings, comment worksheets, and fact sheets regarding the various resources were available for the public as handouts at each scoping meeting. A Spanish speaking BLM staff member attended each of the scoping meetings.

A comment worksheet was circulated at each of the public meetings. The comment worksheet inquired about the public's opinions of lands, minerals, cultural, vegetation, and wildlife and recreation information. BLM invited participants to submit comments in formats other than the comment worksheets, including letters and electronic mail (e-mail) messages.

## **SECTION 2.0 – PLANNING CRITERIA**

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### **2.1 Introduction**

The planning criteria provide direction for the plan, and determine how the planning team approaches the development of alternatives as well as the selection of a preferred alternative. The criteria ensure that plans are tailored to the identified issues and ensure that unnecessary data collection and analyses are avoided. They focus on the decisions to be made in the plan and achieve the following:

- Provide an early, tentative basis for inventory and data collection needs.
- Enable the manager and staff to develop a preliminary planning base map delineating geographic analysis units.
- Stimulate the development of planning criteria during public participation.

### **2.2 Issue Categories**

The resource categories and issues for which public scoping comments were received, or where BLM has identified management concerns, include the following:

- Air Resources
- Soils
- Water Resources
- Biological Resources
- Grazing Management
- Fire Management
- Mineral and Energy Resources
- Lands and Realty
- Special Area Designations
- Wilderness Characteristics
- Visual Resources
- Recreation
- Transportation and Access
- Social and Economic Conditions
- Cultural Resources
- Native American Issues
- Law Enforcement and Undocumented Immigrants (including Public Safety)
- Hazardous Materials
- Facilities and Education

### **2.3 General Planning Criteria**

- The IFNM RMP will establish the guidance upon which the BLM will manage the IFNM, and will supersede all other BLM RMPs for the lands covered by the IFNM RMP.
- The RMP will be completed in compliance with FLPMA, Endangered Species Act, NEPA, and all other relevant federal law and executive orders (including wilderness legislation) and management policies of the BLM. The RMP also will meet the requirements of the Presidential

Proclamation to protect the objects of biological, archaeological, historical, and geological value within the IFNM.

- Where planning decisions have previously been made that still apply, they will be re-evaluated to determine if they are compatible with the Presidential Proclamation and then those decisions will be carried forward into the RMP. They also will use information developed and management alternatives proposed in previous studies of the planning area.
- The planning team will work collaboratively with the State of Arizona; Pinal and Pima counties; tribal governments; municipal governments; other federal agencies; the Resource Advisory Council; and all other interested groups, agencies, and individuals. Decisions in the RMP will strive to be compatible with existing plans and policies of adjacent local, state, tribal, and federal agencies, consistent with federal law and regulations.
- Native American tribal consultations will be conducted in accordance with policy, and tribal concerns will be given due consideration. The planning process will include the consideration of any impacts on Indian trust assets.
- Consultation with the U.S. Fish and Wildlife Service (USFWS) will take place throughout the planning process in accordance with the recent National Memorandum of Agreement to identify conservation actions and measures for inclusion in the plan. The TFO has begun the consultation process with the USFWS under a specific Consultation Agreement, which identified the roles and responsibilities of the TFO and the USFWS during the consultation process.
- Coordination with Arizona State Historic Preservation Office (SHPO) will be conducted throughout the planning process.
- The RMP will recognize the State of Arizona's authority to manage wildlife, including hunting and fishing, within the planning area.
- The RMP will establish whether visitor facilities will be located within the monument, while recognizing the desire to maintain the existing natural and cultural landscapes.
- The RMP will set forth a framework for managing recreational and commercial activities in order to maintain existing natural landscapes and provide for the enjoyment and safety of the visiting public.
- The lifestyles of area residents, including activities of grazing, hunting, and backcountry motorized use and recreation, will be considered in the RMP.
- Any lands or interests located within the IFNM boundary, which are acquired by BLM, will be managed consistently with the RMP, subject to any constraints associated with the acquisition.
- The RMP will address transportation and access for all public lands. Within the IFNM, motorized and mechanized routes will be designated.
- The RMP will recognize all existing rights.
- Federal Geographic Data Committee standards and other applicable BLM standards will be followed.

## SECTION 3.0 – COMMENT SUMMARY

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### 3.1 Introduction

Scoping commenced with the publication of the *Federal Register* Notice of Intent on April 24, 2002. While BLM encourages and considers comments throughout the planning process, BLM requested that comments be submitted early in the process, by September 30, 2002 in order to identify the issues to be addressed in the studies and analyses.

During scoping, BLM received a total of approximately 9,100 letters, e-mail messages, and comment forms. BLM also noted comments made during other meetings with agencies and the public.

### 3.2 Comment Compilation

All of the comments were organized, reviewed, and analyzed to identify the preliminary issues that will be addressed during the preparation of the RMP/EIS. The comment letters, and each comment, was entered into an electronic database system that facilitates organization, sorting, and management of the comments in several different ways including type of submitter (e.g., agency, special interest group, individual), geographic location of submitter, and type of issue.

The majority of the comment letters are attributed to two form letters resulting from letter-writing campaigns. Both of the form letters, submitted primarily through the use of e-mail, pertain specifically to the protection of the natural and cultural resources within the IFNM.

One of the form letters (form letter 1), submitted by approximately 5,270 individuals (about 58 percent of all submittals), urges BLM to develop a plan that emphasizes protecting IFNM resources as the highest priority by limiting vehicle routes and preventing destructive activities. This letter also requests that BLM define the status and distribution of species within the IFNM before BLM develops plan alternatives for the EIS.

The other form letter (form letter 2), submitted by approximately 3,420 individuals (about 38 percent of all submittals), urges BLM to fully protect the IFNM from further degradation and misuse, specifically from off-road vehicles and mining activities.

In addition to the two form letters, approximately 416 individuals, agencies, businesses, and/or special interest groups submitted unique comment letters (about 4 percent of all submittals). These letters were received from the following agencies, businesses, and organizations:

#### State

- Arizona State Land Department

#### Businesses

- Asarco Incorporated
- Parsons Biological Consulting
- Silver Bell Mining, LLC
- T & E, Inc.
- Tucson Electric Power

#### Organizations and Interest Groups

- Alaska Center for the Environment
- American Society of Landscape Architects

- Arizona Coalition for the Environment
- Arizona Desert Bighorn Sheep Society
- Arizona Dust Devils
- Arizona Nature Club
- Arizona Trail Riders
- Arizona Virtual Jeep Club
- Arizona Wilderness Coalition
- Avra Valley-Silverbell Conservation Alliance
- Blackbrook Audubon Society of Northeast Ohio
- Blueribbon American Motorcycle Association
- Center for Biological Diversity
- Defenders of Wildlife
- Friends of Arizona Rivers
- Friends of the Earth, et al.
- Heat Dirt Riders
- International Dark Sky Association
- International Mountain Bicycling Association
- Ironwood Conservation Alliance
- National Wildlife Federation
- Natural Trails and Water Coalition
- Pima Trails Association
- Raytheon Dirt Riders
- Sierra Club
- Sky Island Alliance
- Society for American Archaeology
- Sonoran Desert Mountain Bicyclists
- The Phoenix Zoo
- The Preservation of American Wildlands
- The Wilderness Society
- Tucson Audubon Society
- Urban Trails Coalition
- U.S. PIRG (Public Interest Research Group)
- Wild Canid Research Group

Comments were received from every state in the United States as well as the District of Columbia and Puerto Rico. Approximately 900 of the 9,100 submittals were received from 33 foreign countries. Table 3-1 lists the states from which the most comments were received (that is, states submitting at least one percent of the total submittals).

**Table 3-1 – Geographic Sources of Comments**

<b>Location</b>	<b>Number of Comments</b>	<b>Percent of Comment Letters</b>
California	1,213	13.3
Arizona	706	7.8
Colorado	566	6.2
New York	519	5.7
Florida	455	5.0
Texas	339	3.7
Washington	308	3.4

Location	Number of Comments	Percent of Comment Letters
Pennsylvania	299	3.3
Illinois	298	3.3
Ohio	244	2.7
New Jersey	206	2.3
Oregon	206	2.3
Michigan	201	2.2
New Mexico	188	2.1
Virginia	186	2.0
Massachusetts	174	1.9
North Carolina	173	1.9
Wisconsin	147	1.6
Maryland	146	1.6
Missouri	126	1.4
Georgia	125	1.4
Minnesota	125	1.4
Connecticut	92	1.0
Indiana	92	1.0

Also, BLM provided a comment worksheet at each of the public scoping meetings. The comment worksheet inquired about the public’s opinion on the land use opportunities to consider in the IFNM. Completed comment forms were submitted to BLM by 62 individuals, most of whom have Arizona mailing addresses. As noted in Section 1.4.3, a total of 173 people registered their attendance at the nine scoping meetings.

### 3.3 Summary of Public Comments

The public comments received address a variety of resources and resource uses as well as collaboration and the RMP/EIS process. Each comment letter was reviewed, the individual comments were analyzed and separated into categories, and the comments were entered into a digital database. The approximately 1,600 unique comments (though some of these are very similar in nature) in the database focused on 43 different issues, which were generally grouped into the issue categories listed in Table 3-2. The issues are listed in descending order, rather than the order that categories are presented in this report.

**Table 3-2 – Percent of Letters Mentioning Various Issues**

Issue Category	Percent of Comment Letters Mentioning the Issue
Recreation <sup>1,2</sup>	98.0
Transportation and Access <sup>1,2</sup>	97.7
Biological Resources <sup>1,2</sup>	97.7
Mineral and Energy Resources <sup>1,2</sup>	97.6
Cultural Resources <sup>1,2</sup>	96.4
Lands and Realty <sup>1</sup>	59.6
Facilities and Education <sup>1</sup>	58.5
Visual Resources <sup>1</sup>	58.3
Law Enforcement and Undocumented Immigrants <sup>2</sup>	38.3
Air Resources	< 1.0
Fire Management	< 1.0
Grazing Management	< 1.0
Hazardous Materials	< 1.0

<b>Issue Category</b>	<b>Percent of Comment Letters Mentioning the Issue</b>
Native American Issues	< 1.0
Social and Economic Conditions	< 1.0
Soil Resources	< 1.0
Special Area Designations	< 1.0
Water Resources	< 1.0
Wilderness Characteristics	< 1.0

1 This issue was mentioned in form letter 1.

2 This issue was mentioned in form letter 2.

Within each issue category listed in Table 3-2, the following headings were used to organize the information gathered and analyzed: (1) Issues Overview; (2) Representative Comments; (3) Issues to be Used in the Development and Analysis of EIS Alternatives (further organized by Issues Identified by the Public and BLM Management Concerns); (4) Issues That Can Be Addressed Administratively; and, (5) Issues That Will Not Be Addressed.

Though a majority of the issue categories include information under each of the five heading noted above, headings were omitted if no information or comments were relevant to those particular headings. For example, an issue category that does not have a heading for “Issues That Can be Addressed Administratively” indicates that no scoping comments were received requesting actions by BLM that can be handled administratively. Therefore, headings are listed only where applicable for each issue category.

Each of the headings are defined as follows:

The “Planning Criteria” provide direction for the plan, and determine how the planning team approaches the development of alternatives as well as the selection of a preferred alternative.

The “Representative Comments” are actual statements that were made in comments received during the scoping period. Analysts who had reviewed the comments selected these brief issue-related statements to represent the types of comments that were received on the issue. When specified, the agency or organization that made the comment was noted; if the comment was from an individual, the city and state of the commenter’s address were noted with the comment. Most of the comments selected were brief; however, in some cases additional content of the comment statement has been included to provide further context. Some representative comments apply to more than one resource category and may appear more than once within this report. The number of representative comments presented does not necessarily represent the relative number of comments received on the issue; rather, it is more representative of the variety of viewpoints and context in which those issue statements were received. In some cases, minor spelling or typographical corrections were made within the quoted statements. However, no other changes were made to these statements; they are as they appear in the comment forms, letters, and e-mails.

The “Issues Identified By The Public” a subheading under “Issues to be Used in the Development and Analysis of the EIS Alternatives” also may help guide the focus of the analysis. For example, comments were received that address facilities, particularly for visitors. Alternatives that could be developed for facilities might include (a) providing limited facilities within the IFNM (e.g., kiosks, restrooms); (b) providing a visitor center for interpretive information and public safety within the IFNM boundaries; and (c) locating any visitor facilities outside the boundary of the IFNM.

The “BLM Management Concerns” are those concerns that were not identified by the public during the scoping process, but add to the “Issues to be Used in the Development and Analysis of EIS Alternatives.”

The “Issues That Can Be Addressed Administratively” are those that can be resolved through policy or administrative action include those issues that do not require a plan decision but can be addressed immediately through administrative action by BLM. Examples include removing trash from the IFNM.

### **3.3.1 Air Resources**

#### Planning Criteria

Laws, regulations, policies, and guidelines followed for air resources will include, but not be limited to, Presidential Proclamation 7320, FLPMA, NEPA, Land and Water Conservation Fund Act, and Arizona Standards for Rangeland Health.

The planning criterion is to maintain and enhance air quality and visibility in a manner consistent with the Clean Air Act. Under the Clean Air Act, BLM-administered public lands were given a Class II air quality classification unless reclassified by the State. Wilderness areas and national monuments must be classified as Class I or Class II. This classification allows moderate deterioration associated with moderate, well-controlled industrial and population growth.

#### Issues Overview

Very few comments were received that pertain to air quality. Those that were received regard maintaining air quality for the benefit of wildlife and the reduction of dust pollution in accordance with the Clean Air Act. Another issue raised in the comments was the impact of off-road vehicles and other traffic on air quality within the IFNM.

#### Representative Comments

“Wildlife in the area (such as nesting Harris hawks we found by accident) need protection from vehicles, noise, fumes, and other disturbance.” – Individual, Tucson, Arizona

“BLM must develop an alternative that would include maximum provisions for clean air within the monument, especially the reduction of particulate (dust) pollution.” – Center for Biological Diversity, Tucson, Arizona

“An extensive body of scientific literature documents the adverse impact of off-road vehicles on soil, water, vegetation, sensitive habitats, fish and wildlife, public land visitors and cultural and archeological and historical resources. Off-road vehicles are also significant sources of air, water, and noise pollution.” – Natural Trails and Waters Coalition, Missoula, Montana

#### Issues to be Used in the Development and Analysis of EIS Alternatives

##### *Issues Identified by the Public*

- Monitor air quality in the area and any potential effect on wildlife.
- Reduce activities that create dust pollution.

##### *BLM Management Concerns*

- Consider the effect of air quality on the monument resources, including monument viewsheds.
- Consider whether to recommend a change in the Air Quality Class to the State.

### 3.3.2 Soil Resources

#### Planning Criteria

Laws, regulations, policies, and guidelines followed will include, but not be limited to, Presidential Proclamation 7320, FLPMA, NEPA, Land and Water Conservation Fund Act, Arizona Standards for Rangeland Health, and Executive Order 11988.

Proposed decisions will be measured against the Arizona Standards for Rangeland Health, Standard 1: upland soils will exhibit infiltration, permeability and erosion rates that are appropriate to soil type, climate, and land form (ecological site) to ensure long-term soil productivity. Best management practices will be incorporated into programs to minimize soil erosion and compaction resulting from management actions.

#### Issues Overview

There were very few comments raised in public scoping directly relating to soils. The comments received related to impacts on soils, specifically erosion, and their perceived cause by activities within the IFNM such as mining and travel on roads and trails.

#### Representative Comments

“Erosion and pollution from mining far surpasses that made by OHV [off-highway vehicle] users.”  
– Individual, San Carlos, California

“Once identified, the BLM must assess all legal travel ways for their impact on monument objects including their potential impact on soil compaction and erosion, exotic plant germination and distribution, water drainage and watershed quality, fragmentation of wildlife habitat and travel corridors, disruption or damage of archaeological and cultural sites, damage or obliteration of historic trails, air quality (dust pollution), natural quiet, and interruption of scenic qualities.” – Defenders of Wildlife, Tucson, Arizona

#### Issues to be used in the Development and Analysis of EIS Alternatives

##### *Issues Identified by the Public*

- Evaluate erosion impacts from mining.
- Evaluate erosion impacts for other activities such as off-highway vehicle use and other uses on travel ways.

##### *BLM Management Concerns*

Concerns regarding soils to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Establish reclamation goals for disturbed areas that will ensure that soils are stable.
- Evaluate existing erosion control structures and the need for additional structures.

### 3.3.3 Water Resources

#### Planning Criteria

Laws, regulations, policies, and guidelines followed for water resources will include, but not be limited to, the Presidential Proclamation 7320, FLPMA, NEPA, Land and Water Conservation Fund Act, and Arizona Standards for Rangeland Health.

Water Quality – Section 319 of the Clean Water Act obligates federal agencies to be consistent with state non-point source management program plans and relevant water quality standards. Section 313 requires compliance with state water quality standards. BLM will coordinate with the Arizona Department of Environmental Quality (ADEQ) regarding their total maximum daily load program and other relevant water quality programs. BLM will incorporate applicable best management practices or other conservation measures for specific programs and activities into the RMP. Water quality will be maintained or improved in accordance with state and federal standards. Proposed decisions within the planning area will be in compliance with the Clean Water Act, federal and state water quality standards, and BLM/ADEQ agreements.

Water Rights – Where the need for water rights is identified on the public lands, BLM will file for water rights in accordance with state law and in accordance with the IFNM Presidential Proclamation.

#### Issues Overview

A considerable number of comments were received concerning water resource issues such as groundwater, surface water, artificial waters, and water rights. The majority of the comments received were related to potential impacts on water quality from activities within the monument such as mining, vehicles, grazing, etc. Additionally, several comments were concerned with protecting waters for the benefit of wildlife and biodiversity in the IFNM. Very few comments were received regarding water rights and artificial water development.

#### Representative Comments

“Close and rehabilitate all vehicle routes that threaten cultural and historic sites, fragment wildlife habitat, damage plants, soils and local hydrology; and endanger public safety and private property.” – Individual, Tucson, Arizona

“BLM should test and monitor the quality of groundwater resources to ensure local mining and ranching operations are not polluting the monument aquifer.” – Individual, unspecified community

“[Off road vehicles] threaten and destroy cultural resources, habitat for wildlife, catchments for clean and healthy drinking water, a variety of recreational opportunities and solitude.” – Alaska Center for the Environment, Anchorage, Alaska

“Create a transportation system that will provide reasonable access while safeguarding wildlife habitat, plant species, soil and local hydrology.” – Individual, Green Valley, Arizona

“I am concerned about water quality issues and possible well contamination due to mining in the area.” – Individual, Marana, Arizona

“Please protect and restore springs and seeps, for critical wildlife water sources.” – Individual, unspecified community

“The scoping process should consider the impact of reserving water upon present existing water rights, particularly for important existing economic interests such as the Silver Bell Mine. [No] water rights that are legally held should be impacted by the management plan.” – Silver Bell Mining, LLC, Marana, Arizona

“BLM should file for ownership of any water rights on newly developed wells or springs. We discourage development of artificial waters, however.” – Individual, Cortaro, Arizona

### Issues to be Used in the Development and Analysis of EIS Alternatives

#### *Issues Identified by the Public*

- Protect groundwater resources from contamination from activities such as mining, vehicle use, and ranching.
- Identify an aquifer protection plan including groundwater monitoring.
- Review water rights and potential impacts to those rights.
- Discourage development of artificial waters.

#### *BLM Management Concerns*

A concern regarding water resources to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), is as follows:

- Identify any watersheds designated by ADEQ as Category I watersheds and identify decisions or restoration actions that should be considered.

### **3.3.4 Biological Resources**

#### ***3.3.4.1 Vegetation and Noxious Weeds***

##### Planning Criteria

#### *Vegetation and Noxious Weed Management*

Laws, regulations, policies, and guidelines followed for vegetation and noxious weed management will include, but are not limited to, Arizona Standards for Rangeland Health and Guidelines for Grazing Administration, BLM Grazing Regulations 43 CFR 4100, Executive Order 13112, FLPMA, Federal Noxious Weed Act of 1974, Federal Pollution Control Act, NEPA, Presidential Proclamation 7320, Public Rangelands Improvements Act, Soil Conservation and Domestic Allotment Act, Taylor Grazing Act, and the Watershed Protection and Flood Control Act.

Proposed decisions on vegetation and noxious weed management will be measured against various state and federal laws and regulations to ensure the continuance of desired plant communities, which provide for biodiversity, and protection and restoration of native species. Desired plant community descriptions will be developed that emphasize the protection of the diversity of natural communities specified in the proclamation. Vegetation will be managed to achieve desired plant communities (considering the ecological site potential) that provide for biodiversity as well as protection and restoration of native species. The plant communities will be managed to protect, improve, and restore communities to provide wildlife habitat.

Noxious weeds (invasive species) are defined as “alien species whose introduction does or is likely to cause economic or environmental harm or harm to human health” (Executive Order 13112). BLM will work with county, state, tribal, and federal agencies, and individuals to monitor, manage, and control

noxious weeds and invasive species within the monument. Noxious weed control will be considered in the RMP in accordance with the integrated weed management guidelines and design features identified in national, state, and local BLM programs and policies. Noxious weed infestations will be prevented, contained, and/or reduced on BLM-administered public land using an integrated pest management approach. Proposed decisions will be assessed to determine whether or not they would contribute to the introduction or spread of noxious weeds or invasive species in accordance with the federal Noxious Weed Act and Executive Order 13112. Management practices that prevent and control invasive species will be emphasized.

### Issues Overview

A majority of the comments received regarding vegetation and noxious weeds for the monument concerned the existing status and distribution of the vegetative communities and management thereof to ensure retention and enhancement of biodiversity. Comments regarding vegetation focused primarily on protection of the ironwood tree and small cacti species. Impacts on flora species from recreational, land development, grazing, and mining activities were the prominent concerns. Additionally, comments emphasized the importance of the ironwood tree as a nursery plant as well as for forage and shelter for a wide range of fauna species. Comments received regarding noxious weeds stressed the importance of off-road vehicle management and grazing management practices within the monument to avoid the introduction of noxious weeds. Remediation of existing noxious weeds also was a concern because of the detrimental effects on biodiversity.

### Representative Comments

“Botanical communities require a long time to grow and recover and all life depends on the communities.” – Individual, unspecified community

“[Protect] diverse desert habitat, rare cacti species, dense stands of ironwood trees [and desert bighorn sheep].” – Individual, Scottsdale, Arizona

“Ironwood cannot be [easily] reclaimed. If it is destroyed, restoring it will not be easy.” – Individual, unspecified community

“A major objective of the management plan must be to protect [ironwood trees], which in turn will also help protect other species.” – Individual, Santa Barbara, California

“The ironwood system provides roosts for hawks and owls, burrows for desert tortoise, forage for desert bighorns, nests for white-winged doves and nearly [an additional] 150 bird species.” – Alaska Center for the Environment, Anchorage, Alaska

“Grazing should be scientifically managed to limit damage to soils, plants, and effects on wildlife.”  
– Individual, Glendale, Arizona

“Please let us have a baseline assessment first of the flora/fauna which will be affected, the impact of off-road vehicles and the economic impact of mining, development and vehicular traffic versus the economic importance of low impact eco-tourism in this area.” – Individual, Lakeland, Florida

“BLM’s goal should be to manage for a natural range of native plant associations. Prevent introduction and spread of exotic plants. Monitor and assess rangeland conditions to ensure cattle or existing ranching practices are not introducing or encouraging the spread of exotic plants.” – Individual, unspecified community

“Eliminate noxious and exotic species of plants from IFNM” – Individual, Tucson, Arizona

“We realize that roads are one of the prime vectors of exotic species as well as trash. This is one of the primary reasons suggesting road closures.” – T&E, Inc., Cortaro, Arizona

### Issues to be Used in the Development and Analysis of EIS Alternatives

#### *Issues Identified by the Public – Vegetation*

- Close and rehabilitate all the vehicle routes that threaten vegetation.
- Develop a baseline assessment of vegetative communities.
- Protect ironwood trees and rare cacti species from human activities.
- Restore native plant species.
- Ban target shooting to protect vegetation.
- Recognize that ironwood trees cannot be easily reclaimed.

#### *Issues Identified by the Public – Noxious Weeds*

- Eradicate existing noxious weeds.
- Close roads that serve as a transfer source of noxious weeds.
- Monitor and assess rangeland conditions to ensure cattle or existing ranching practices are not introducing or encouraging the spread of exotic plants.

#### *BLM Management Concerns*

- Ensure that management actions and uses within the IFNM are not introducing or spreading non-native or noxious plants.
- Determine which vegetative products, if any, should be available for collection (e.g., firewood).

### Issues That Can Be Addressed Administratively

- Require Asarco mining operation to restore vegetation in areas of illegal mining activities. Asarco has reclaimed the areas of trespass within the IFNM and vegetative monitoring will continue in this area.

#### ***3.3.4.2 Special Status Species***

##### Planning Criteria

Laws, regulations, policies, and guidelines followed for special status species management will include, but are not limited to, Arizona Standards for Rangeland Health and Guidelines for Grazing Administration, BLM Manual 6840, Desert Bighorn Sheep Range Wide Plan and Sonoran Desert Tortoise Range Wide Plan, Endangered Species Act, Executive Order 13112, FLPMA, NEPA, Nichol’s Turks Head Recovery Plan, Presidential Proclamation 7320, Public Rangelands Improvements Act, Sikes Act, and the Taylor Grazing Act.

Special status species (federally designated threatened, endangered, or agency designated sensitive species or species of concern) are flora and fauna species that need increased protection due to dwindling numbers or loss of habitat. Proposed management decisions for this planning effort will be designed to enhance and maintain habitat for special status species. Management actions authorized, funded, or implemented by BLM will be done so as to not jeopardize the continued existence of federally listed

threatened or endangered flora or fauna species or result in the destruction or adverse modification of critical habitat. Species proposed for federal listing and proposed critical habitat will be given the same consideration as listed species. Candidate species, BLM-sensitive and AGFD-listed species will be managed so as not to contribute to the need to list as threatened or endangered. The intent is to recover listed species and maintain healthy populations of all other species and therefore avoid the need for further listing of any species as threatened or endangered.

In addition, BLM adheres to BLM's Manual 6840, which outlines the conservation management procedures of threatened and endangered species and the habitat on which they depend; ensures that all actions that BLM authorizes, funds, or implements comply with the Endangered Species Act; requires cooperation with the USFWS in the planning and recovery of threatened and endangered species; states the BLM policy for managing special status candidate species. BLM also will follow terms and conditions implemented by Biological Opinions and Conservation Agreements when making special status species management decisions for the IFNM.

### Issues Overview

The comments received regarding special status species were concerned mostly with habitat restoration and protection from human encroachment and recreational activities. A majority of the concern expressed for special status species included emphasis that BLM assess existing road and dirt tracks associated with recreational activity and propose closure of those roads and activities that occur near habitat of special status species. Many of the comments request that BLM give precedence to protection and restoration of habitat for threatened, endangered species, and species of concern (as listed by AGFD) that have been assembled within the Sonoran Desert Conservation Plan.

### Representative Comments

“Prohibit new mining, purchase nearby lands for ecological integrity and protecting habitat for species of concern.” – Individual, Grand Canyon, Arizona

“Imperiled species should be a top concern in management decisions.” – Individual, Davis, California

“Budget to restore and protect habitat for endangered and protected species.” – Individual, Arivaca, Arizona

“Protect and restore habitat for threatened and endangered species.” – Individual, Tucson, Arizona

“Exclude the private lands in held to Ironwood Forest National Monument from [Pima] County's proposed Section 10 permit [under the Endangered Species Act for a regional, multi-species conservation plan].” – Ironwood Conservation Alliance, Tucson, Arizona

### Issues to be Used in the Development and Analysis of EIS Alternatives

#### *Issues Identified by the Public*

- Preserve open space, wildlife habitat, and protect the area's endangered species.
- Protect and restore priority vulnerable species as identified in the Sonoran Desert Conservation Plan.
- Consider special status species concerns in transportation and access planning, including desert tortoise.

## *BLM Management Concerns*

Concerns regarding special status species to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Evaluate potential closure areas to human access or regulate land use to prevent potential disturbance to sensitive plant and animal resources.
- Determine what management actions are necessary to reduce the chance of habitat degradation for desert tortoises and still provide for increased human visitation and historical uses such as grazing, hunting, recreation, etc.

### ***3.3.4.3 Wildlife and Wildlife Habitat***

#### Planning Criteria

Laws, regulations, policies, and guidelines followed for wildlife and wildlife habitat management will include, but are not limited to, Arizona Standards for Rangeland Health and Guidelines for Grazing Administration, BLM Manual 6840, Desert Bighorn Range Wide Plan and Desert Tortoise Range Wide Plan, Endangered Species Act, FLPMA, Presidential Proclamation 7320, Public Rangelands Improvement Act, Sikes Act, and the Silverbell-Baboquivari Habitat Management Plan.

Proposed wildlife and wildlife habitat management activities for the IFNM include re-establishment of native species, protection and enhancement of the habitat of these native species, and development of policies and guidelines designed to prevent harm to the health of these species or degradation of their habitats. State regulations govern the taking of wildlife not listed as threatened or endangered by the USFWS.

BLM works in cooperation with the AGFD on management plans, studies, and permits as well as the USFWS to manage wildlife and wildlife habitat on its public lands. Additionally, BLM coordinates with Pima County on the Sonoran Desert Conservation Plan to achieve levels of consistency on wildlife protection, including migration corridors. BLM also manages habitat for game animals on public lands. Currently, for the game management units within the IFNM, hunting seasons are established for mule deer, javalina, desert bighorn sheep, mountain lion, and small game such as quail, rabbits, and doves.

#### Issues Overview

A majority of the comments received regarding biological resources within the monument expressed concern for wildlife and wildlife habitat. These comments stated that BLM should make wildlife and wildlife habitat protection and enhancement the utmost priority within the RMP. Concern for the desert bighorn sheep and the impact from human activity was prominent. Most people that commented would like BLM to implement seasonal closures near bighorn sheep habitat and lambing areas. Additionally, comments stressed the importance of managing mining, grazing, recreational shooting, camping activities, and land development as they relate to wildlife habitat and wildlife corridors. Concern about recreational off-road vehicles and the associated effects on wildlife and habitat were numerous; the comments note the noise pollution these vehicles generate and the myriad trails created by them. Other comments state that BLM should implement ongoing enforcement actions for recreational activities within the monument to avoid habitat destruction. Many comments urge BLM to purchase State Trust Land near wildlife habitat areas to ensure future protection of these habitats. Others stressed the importance of wildlife conservation versus wildlife preservation. Some comments state that wilderness designation would be the best approach to protect wildlife and habitat. Concern for wildlife and habitat from illegal activity and undocumented immigrant activity also was expressed.

## Representative Comments

“I urge you to develop a plan that makes protecting the Monument's biological resources the highest priority by appropriately limiting vehicle routes and preventing destructive activities like mining.”

– Alaska Center for the Environment, Anchorage, Alaska

”BLM should include full consideration of wildlife populations including the desert bighorn, in their management plans. This means mining, activities; off-road travel and inappropriate development should not be permitted.” – Individual, Gunnison, Colorado

“Wildlife in the area (such as nesting Harris hawks we found by accident) need protection from vehicles, noise, fumes, and other disturbance.” – Individual, Tucson, Arizona

“Wildlife is important to this area and must be protected. Wildlife corridors, migration, routes and access to forage must be kept intact.” – Individual, Beaverton, Oregon

“Mining poses a considerable threat to this important wildlife habitat.” – Individual, Denver, Colorado

“Purchase State Trust Lands and private lands critical to maintain ecological integrity and wildlife populations.” – Individual, Tucson, Arizona

“This land was created in part as a refuge for the Bighorn Sheep that live there.” – Individual, Sherman Oaks, California

“Consider prohibiting the husbandry of domestic sheep within a 15-mile radius of known bighorn sheep habitat for the purpose of avoiding domestic sheep botfly larvae from infecting the wild sheep population.” – Individual, Tucson, Arizona

“[It] is necessary that those responsible for the stewardship of the land make themselves aware of the baseline of present flora and fauna within their operations.” – Individual, unspecified community

“Off-road vehicles and mining can destroy the ancient trees and the diverse wildlife populations of the monument and should be strictly curtailed.” – Individual, Federal Way, Pennsylvania

“Protect the biodiversity, integrity and population viability of wildlife within the monument.”  
– Individual, Orrville, Ohio

“Please limit all development within the Monument so the wildlife within and without (that which makes use of the area in migration or foraging routes) will be protected.” – Individual, unspecified community

“Consider seasonal closures for Ragged Top and other areas during breeding and lambing [of bighorn sheep].” – Individual, Tucson, Arizona

“This plan should include: Careful monitoring of the monument lands and wildlife.” – Individual, Pacific Grove, California

“Help create a huge wildlife corridor by extending or connecting the Monument to the Tortolita Mountain Preserve.” – Individual, Tucson, Arizona

“Target shooting is harmful to the bighorn sheep.” – Individual, Marana, Arizona

“Management of predators on the monument by Arizona Game and Fish -per state policy- ensures the sheep population for the future.” – Individual, Tucson, Arizona

“BLM should do as little as possible to protect so called endangered species, extinction is a normal process and no one really cares if some rat or weed dies off.” – Individual, Phoenix, Arizona

“Once identified, the BLM must assess all legal travel ways for their impact on monument objects including their potential impact on soil compaction and erosion, exotic plant germination and distribution, water drainage and watershed quality, fragmentation of wildlife habitat and travel corridors, disruption or damage of archaeological and cultural sites, damage or obliteration of historic trails, air quality (dust pollution), natural quiet, and interruption of scenic qualities.” – Individual, Tucson, Arizona

“Of primary concern to the [Arizona Desert Bighorn Sheep Society, Inc.] is that the establishment of the Ironwoods Monument does not compromise, restrict or unnecessarily delay sound wildlife management and conservation activities.” – Arizona Desert Bighorn Sheep Society, Inc., Phoenix, Arizona

### Issues to be Used in the Development and Analysis of EIS Alternatives

#### *Issues identified by the Public*

- Close Ragged Top to all forms of entry and activity (and other areas important to desert bighorn sheep) seasonally during bighorn sheep lambing and breeding seasons.
- Close roads that fragment wildlife habitat.
- Keep off-road vehicles on designated trails to prevent habitat fragmentation.
- Prevent inappropriate development in the monument that can damage wildlife corridors.
- Acquire more land for additional habitat.
- Ban target shooting to protect wildlife habitat.

#### *BLM Management Concerns*

Concerns regarding wildlife and wildlife habitat to be addressed in the plan, identified by BLM (but not addressed by other agencies or the public during scoping) are as follows:

- Identify what indicators or limits of acceptable change will be used to determine when wildlife populations are being impacted to an unacceptable degree.
- Integrate habitat management with other resource programs to minimize impacts on wildlife species and their habitats while still providing for other uses on the public lands within the IFNM.
- Determine what management actions are necessary to encourage movement of desert bighorn sheep from the Silverbell Resource Conservation Area into other areas to increase genetic exchange and to improve the health of the herd.
- Implement recovery and conservation plans for special status species through management practices.
- Evaluate the use of wildlife water catchments in the IFNM.

### Issues That Can Be Addressed Administratively

- Require Asarco mining operation to restore land that it illegally trespassed near wildlife habitat.

### 3.3.5 Grazing Management

#### Planning Criteria

Laws, regulations, policies, and guidelines followed for livestock grazing management include, but are not limited to, Arizona Standards for Rangeland Health and Guidelines for Grazing Administration, BLM grazing regulations 43 CFR 4100, Desert Bighorn Sheep Range Wide Plan, Desert Tortoise Range Wide Plan, Eastern Arizona Grazing EIS (BLM 1986), Endangered Species Act, Presidential Proclamation 7320, Public Rangeland Improvement Act, Safford/Tucson Grazing Biological Opinion 2-21-96-F-160 (as amended), and the Taylor Grazing Act.

With this planning effort, BLM will provide for livestock management in the IFNM and will determine if allotments are open or closed to grazing in accordance with the Taylor Grazing Act and, if open, in what manner. Decisions will include a strategy for ensuring that proper grazing practices are followed while preserving habitats for sensitive plant and wildlife species. The RMP will incorporate the statewide standards and guidelines established by the BLM State Director and approved by the U.S. Secretary of the Interior. It will include a strategy for ensuring that proper grazing practices are followed while preserving habitats for sensitive plant and wildlife species. Appropriate best management practices will be followed to protect rangeland resources and, where necessary, to mitigate any conflicts with other uses and values. Administrative actions to assure compliance with existing permit/lease requirements, to modify permits and leases, to monitor and supervise grazing use, and to remedy unauthorized grazing use will continue.

#### Issues Overview

Most of the comments received concerning livestock grazing management in the IFNM stress that BLM must conduct an inventory of current grazing practices and assess rangeland conditions and allotment plans prior to developing management criteria. Some comments state that livestock grazing activity should not occur within the IFNM at all, while others would like to retain their existing grazing allotments and animal unit months (AUMs). Some comments state that livestock grazing activities should be phased out slowly from the monument. The concern for wildlife competing with livestock is important to some people, whereas others urge BLM to develop a quality grazing management plan for multi-use activity within the IFNM.

#### Representative Comments

“Inventory and assess rangeland conditions and implement allotment management plans.” – Individual, Tucson, Arizona

“Grazing levels should also be closely monitored to ensure that no degradation is taking place through inappropriate or over-stocking.” – Individual, Davis, California

“Please assess and mitigate negative grazing impacts on grassland animals and desert tortoise habitat.” – Individual, unspecified community

“Evaluate the impact of livestock on cultural and historical monument objects. Cattle should be removed from sensitive archaeological and historical sites.” – Individual, unspecified community

“The BLM must consider all the scientific evidence that livestock negatively impact soil, native plant communities, watershed function, endangered species, game animals, songbirds, cultural and historic resources, scenic and recreational values.” – Center for Biological Diversity, Tucson, Arizona

“Eliminate cattle grazing.” – Individual, Tucson, Arizona

“Preclude domestic livestock grazing in riparian and other environmentally sensitive areas.” – Individual, Minneapolis, Minnesota

“Consider prohibiting the husbandry of domestic sheep within a 15-mile radius of known bighorn sheep habitat for the purpose of avoiding domestic sheep botfly larvae from infecting the wild sheep population.” – Individual, Tucson, Arizona

“Livestock should be removed from areas where they compete with monument wildlife objects, such as in critical rare cactus habitat and bighorn sheep lambing grounds, and should be removed from areas where they pose a significant threat to cultural and historic resources.” – Defenders of Wildlife, Tucson, Arizona

“We want to keep our cattle business intact, without loss of AUMs or grazing land or our home.”  
– Individual, Tucson, Arizona

“I fully support ranching and mining activities in this area.” – Individual, Phoenix, Arizona

“Environmentally sound grazing practices need to be implemented and then kept in place inside the Monument.” – Individual, Mesilla Park, New Mexico

“Grazing should be scientifically managed to limit damage to soils, plants, and effects on wildlife.”  
– Individual, Glendale, Arizona

“BLM needs to hire a range specialist to defend any opposition towards grazing.” – Individual, unspecified community

“A single range management plan would not be appropriate for all allotments in the entire monument.”  
– Avra Valley-Silverbell Conservation Alliance, Tucson, Arizona

### Issues to be Used in the Development and Analysis of EIS Alternatives

#### *Issues Identified by the Public*

- Inventory and assess current rangeland conditions.
- Monitor grazing activities.
- Address and restore overgrazed areas.
- Remove cattle from locations near sensitive flora and fauna species habitat.
- Preclude grazing from environmentally sensitive areas.
- Implement allotment range management plans.
- Consider the impact of grazing on wildlife.
- Support the presence of economically viable ranches.

#### *BLM Management Concerns*

- Determine what management actions are necessary to reduce the chance of habitat degradation for desert tortoises and still provide for increased human visitations and historical uses such as grazing, hunting, recreations, etc.
- Evaluate grazing leases that were issued for the lands within the IFNM prior to the establishment of the monument; many of the ranches have been mapped for ecological sites for coordinated ranch plans through the Natural Resources Conservation Service.

- Determine fire and grazing management strategies that will be employed on lands within and adjacent to the IFNM to protect regeneration of native plants.
- Determine the appropriate levels of livestock grazing for the IFNM.
- Determine the role of livestock grazing in the IFNM as it relates to the tourism industry.
- Determine if livestock grazing supports dude ranching or commercial off-highway vehicle tours in the IFNM.
- Determine areas within the IFNM where livestock grazing is not appropriate, determine areas for seasonal use grazing, and determine class of livestock that should be allowed.
- Determine how monitoring and adaptive management will be used to manage grazing in the IFNM.

#### Issues That Can Be Addressed Administratively

- Ensure monies available for ranch assistance are spent on range management activities.

### **3.3.6 Fire Management**

#### Planning Criteria

Fire management is divided into two categories: wildfire and prescribed fire. Fire management decisions and prescriptions made in the Arizona Statewide Land Use Plan (LUP) Amendment for Fire, Fuels, and Air Quality and Environmental Assessment (U.S. Department of the Interior, BLM 2003) will be incorporated into the IFNM RMP. Adjustments to the fire decisions, if required, will be consistent with the Federal Wildland Fire Policy, the National Fire Plan, and all other BLM policy.

Fire suppression will be accomplished with the least amount of surface disturbance and to protect significant cultural or paleontological values. Public lands and resources affected by fire will be rehabilitated in accordance with the objectives identified for the affected area, subject to BLM policies and available funding.

#### Issues Overview

Very few comments noted fire management as an issue. Those comments received generally focused on maintaining open roads to ensure that sufficient access is available to fight wildfires and taking protective measures to prevent human-caused wildfires.

#### Issues to be Used in the Development and Analysis of EIS Alternatives

##### *Issues Identified by the Public*

- Consider fire control and fire fighting when evaluating roads for closure.

##### *BLM Management Concerns*

- Wildfire risk is greater where non-native vegetation is present, which can threaten native plant communities.
- Determine availability of firewood for collection.

#### Issues That Can Be Addressed Administratively

- Take protective measures to prevent human-caused wildfires.

### 3.3.7 Mineral and Energy Resources

#### Planning Criteria

Minerals management will be consistent with the General Mining Law of 1872 (as amended), FLPMA, Mining and Minerals Policy Act, National Materials and Minerals Policy, Research and Development Act, and current BLM mineral resources policy.

Additionally Presidential Proclamation 7320 withdrew all public lands within IFNM from entry, location and leasing under the mineral leasing and mining laws. In order to establish valid existing rights for a mining claim, a validity examination must be conducted to determine if the claim supported a discovery of a valuable mineral deposit prior to the Proclamation.

#### Issues Overview

There were many comments relating to mining activities in the IFNM. Those opposed to mining were concerned with impacts on wildlife, water quality, and erosion. Most of the comments relating to mineral and energy resources are general comments opposed to mining access and activities in the area without stating specific reasons for the opposition. A large number of comments indicate opposition to mining activities due to the potential impact on wildlife and vegetation in the area. A small number of comments indicate opposition to mining because of the impacts on water quality and erosion from mining operations. Several comments supported mining access and operations in the IFNM.

In addition to those comments discussed above, a large number of comments received relating to mineral and energy resources discuss the issue of historical environmental damage by mining companies. These comments suggest that those responsible should restore areas that have been disturbed by past mining operations. Some of these comments refer specifically to the Asarco Silver Bell mining operations.

#### Representative Comments

“Prohibit any new mining or mine expansion within the Monument.” – Tucson Audubon Society, Tucson, Arizona

“There is no place in units of the National Park System for ATV's, motorized personal water craft, snowmobiles, or commercial operations like logging, grazing or mining.” – Individual, Billings, Montana

“I believe that the [IFNM] should be left as pristine and unspoiled as possible, with no off-road vehicles of any type allowed (including bicycles), vehicles restricted to designated roadways only, and no mining, logging, grazing, or other commercial activities allowed.” – Individual, Phoenix, Arizona

“Protect [Ironwood Forest National Monument and all other National Parks and Monuments] from the ravages that are caused by mining, clear cut logging and especially off-road vehicles.” – Individual, Copperopolis, California

“Consider both the mineral and economic potential of the area and reinstate the ability to locate mining claims in the areas of the district with good mineral potential.” – Individual, Tucson, Arizona

“The Monument has the potential to impact the Silver Bell Mine in the following ways: 1) jeopardizing existing operations, 2) threatening near term plans for expansion or replacement of mineral reserves on Asarco land, 3) threatening the ability to prove and develop Asarco's mining claims within the Monument boundary, negatively impacting longer term prospects for expansion or replacement of reserves. [Each] of these impacts would be affected by the nature of the RMP for the Monument.” – Silver Bell LLC, Marana, Arizona

“I am against mining, exploration and mine expansion in the area since it will significantly threaten the last viable population of bighorn sheep indigenous to the Tucson basin.” – Individual, Tempe, Arizona

“Mining will significantly threaten big horn sheep and their habitat and should not be allowed.”  
– Individual, San Diego, California

“Preserve and protect Ironwood, its flora, fauna and environment from the predators that would devour it. Predators such as Asarco, heedless off-road vehicle users, and the many who think concerns such as these are quaint.” – Individual, unspecified community

“I do not believe that sensible mining practices would significantly threaten bighorn sheep and their habitat.” – Individual, Rockwell, North Carolina

“I am concerned about water quality issues and possible well contamination due to mining in the area.”  
– Individual, Marana, Arizona

“BLM should test and monitor the quality of groundwater resources to ensure local mining and ranching operations are not polluting the monument aquifer.” – Individual, unspecified community

“If an environmental impact survey has been made, it may conclude that erosion and pollution from mining by far surpasses that made by OHV users.” – Individual, San Carlos, California

“Please restore all areas and watersheds damaged by off-road vehicle use and help in their recovery from ATV, grazing or other extractive industry damage.” – Individual, Minneapolis, Minnesota

“Asarco should be required to restore fully the land it illegally disturbed.” – Individual, San Diego, California

### Issues to be Used in the Development and Analysis of EIS Alternatives

#### *Issues Identified by the Public*

- Prohibit mining or mine expansion.
- Consider how mining may contribute to the disturbance of desert bighorn sheep or destruction of desert bighorn sheep habitat.
- Keep the monument free from destructive practices such as mining.
- Consider avenues for the restoration of habitat disturbed by historical mining operations.
- Bar any interference with current or future mining activities at the Silver Bell mine location.

#### *BLM Management Concerns*

Concerns regarding mineral and energy resources to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Establish reclamation goals for mining disturbance that stabilize the site and conform with designated past mining land uses and established land use objectives.
- Retain ability to use mineral material for administrative purposes within the IFNM.
- Consider general requirements for protecting resource values of the public lands, including stipulations and construction and/or operating standards to apply to surface disturbing activities.

### 3.3.8 Lands and Realty

#### 3.3.8.1 *Land Tenure Adjustments*

##### Planning Criteria

Laws, regulations, policies, and guidelines followed for land tenure adjustments will include, but not be limited to, Presidential Proclamation 7320, FLPMA, NEPA, Federal Land Exchange Facilitation Act, Recreation and Public Purposes Act, Land and Water Conservation Fund Act, and Arizona Standards for Rangeland Health.

All lands and interest in lands within the monument will be retained in federal public ownership. The RMP will evaluate the opportunity for acquiring non-federal lands within or adjacent to the monument that could protect or enhance management of monument resources. Acquired lands and interests within the monument boundary will be added to the monument. Decisions to acquire lands will be based on public benefits, management considerations, and public access needs. Specific actions to implement RMP land tenure decisions will include full public participation.

Presidential Proclamation 7320 withdrew the monument from all forms of entry, location, selection, sale, or leasing or other disposition under public land laws, including but not limited to withdrawal from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposes of the monument.

##### Issues Overview

The comments received on land tenure adjustments resources. Several comments also note that BLM should pursue acquisition of private lands for similar reasons focus on the inholdings of private and State Trust Land within the monument boundaries. Some commenters suggest that BLM should work with the Arizona State Land Department to adjust land ownership patterns to protect natural resources. Other comments indicate that BLM should not change ownership patterns within the monument or that BLM should recognize private property rights. In addition, one comment requests that BLM consider whether the monument and its planning would affect trespass on State Trust Land.

##### Representative Comments

“A majority of the 54,773 acres of State Trust land within the IFNM boundaries are in large blocks on the monument’s periphery. It is, therefore, conceivable that these trust lands could be excluded from the IFNM boundary without diminishing its integrity or purpose, since they are not actually part of the monument.” – Arizona State Land Department, Phoenix, Arizona

"State Trust Lands and private lands critical to maintain ecological integrity and wildlife populations should be purchased." – Individual, Albuquerque, New Mexico

“BLM should do nothing that harms private property rights of those in the monument area.” – Individual, Phoenix, Arizona

“Establish a plan that will accurately map out a strategy for dealing with the state and private land inholdings in the Monument. A strategy [should be] developed to acquire them.” – Individual, Tucson, Arizona

“Maintain the status quo of land ownership and land uses within the IFNM.” – Individual, unspecified community

## Issues to be Used in the Development and Analysis of EIS Alternatives

### *Issues Identified by the Public*

- Acquire inholdings, including private and State Trust Land.
- Assure that private property rights will be protected.
- Examine the possibility of using conservation easements, in lieu of land acquisition, to prevent excessive development from occurring in or adjacent to the monument.

### *BLM Management Concerns*

Concerns regarding land tenure adjustment to be addressed in the plan, identified by BLM (but not necessarily other agencies or the public during scoping), are as follows:

- Develop criteria for prioritizing lands for acquisition.
- Determine recommended management for lands that may be acquired within the monument.
- Evaluate existing Recreation and Public Purposes Act leases for the potential for patent or modification.

### **3.3.8.2 Right-of-Way Corridors, Communications Sites, and Renewable Energy Sites**

#### Planning Criteria

Laws, regulations, policies, and guidelines followed for right-of-way corridors, communication sites, and renewable energy sites will include, but not be limited to, Presidential Proclamation 7320, FLPMA, NEPA, Land and Water Conservation Fund Act, and Arizona Standards for Rangeland Health.

Existing and proposed land use authorizations (e.g., corridors, communication sites, renewable energy sites, apiary permits, etc.) will be evaluated for compatibility with protecting the monument resources. Existing right-of-way corridors and communication sites from previous plans may be modified, removed, or carried forward. Additional right-of-way corridors and communication sites, and new renewable energy sites, including wind and solar energy, will be considered based on consideration of monument resource protection, along with established criteria, procedures, and policy, and in association with industry demand and resource protection objectives. New locations for right-of-way corridors, communication sites, and renewable energy sites also will consider environmental quality, economic efficiency, security, safety, and good engineering and technological practices. Decisions will consider preferred locations and exclusion areas to protect significant resource values.

#### Issues Overview

A small number of comments were received regarding utilities and communication facilities within IFNM, and no comments were received pertaining to renewable energy sites. Utility comments (received from the energy generating and transmission industries) indicate that the IFNM creates potential restrictions to energy distribution in southern Arizona. A comment received from an individual expresses opposition to limiting utility corridors because these facilities provide needed access to remote areas of the IFNM. Commenters that are opposed to the new utility corridors urge the BLM, in general, to keep the IFNM free of development, including power lines.

#### Representative Comments

“Without consultation with electric utilities in general, and TEP in particular, segments of these necessary [extra high voltage] facilities have been recently designated as part of the IFNM. The result has been the

creation of potential restrictions to existing electric energy distribution and/or to plans for other southern Arizona system enhancements that may cost hundreds of millions of dollars to change.” – Tucson Electric Power, Tucson, Arizona

“Prohibit any proposed power lines from crossing land contained within the Monument.” – Individual, Arivaca, Arizona

“I am opposed to [limiting power lines]. Power lines create roads vital to provide access to remote areas.” – Individual, Phoenix, Arizona

### Issues to be Used in the Development and Analysis of EIS Alternatives

#### *Issues Identified by the Public*

- Do not allow power line development.
- Allow existing electric infrastructure to remain and continue to serve their respective customer loads.

#### *BLM Management Concerns*

Concerns regarding right-of-way corridors, communication sites, and renewable energy sites to be addressed in the plan, identified by BLM (but not necessarily other agencies or the public during scoping), are as follows:

- BLM must comply with federal regulation pursuant to 43 CFR 2800 for all right-of-way renewals, which would include the NEPA process and the review of the holder’s services provided under the existing rights-of-way, and determine if the renewal of the existing BLM right-of-way authorization would conflict with the values of the Monument and the Presidential Proclamation.
- For right-of-way corridors, consider the following:
  - Types of right-of-way facilities to be allowed
  - Right-of-way activities to be allowed or restricted
  - Non-right-of-way activities to be allowed, restricted, or prohibited within the proposed right-of-way corridor or right-of-way use area
  - Non-standard or administrative (i.e., resource protection) terms and conditions to be applied to specific right-of-way facilities that may be subsequently located within the right-of-way corridor or right-of-way use area
  - Ancillary facilities and “perpendicular” access needed to efficiently gain access to the right-of-way corridor or right-of-way use area

### **3.3.8.3 Land Use and Development**

#### Planning Criteria

Existing development and facilities on public land will be evaluated for compatibility with protecting monument resources. BLM will consider new permanent development or facilities in the monument only for recreation purposes to the extent they are compatible with IFNM resource protection. Decisions for placing any new facilities will consider preferred locations and exclusion areas to protect significant resource values.

## Issues Overview

The comments received on land use and development within the IFNM focus on the potential for additional development, including visitor facilities, to occur within the monument. Several comments note that nearby urban development is encroaching upon the IFNM and its resources, and that as one of the greatest threats facing the IFNM, this “urban sprawl” should be managed. A large proportion of the comments favor limiting or prohibiting any additional development within the monument, including visitor facilities. A few comments note that the encroachment of development results in negative effects on visitor experiences, natural landscapes, or wildlife populations and habitat.

## Representative Comments

“Ironwood Forest National Monument must be protected from development of any kind – mining, roads, housing – forever.” – Individual, Lake City, Minnesota

“The three greatest threats to the integrity of the monument that I recognize are: uncontrolled recreational use of the monument; grazing and the ever expanding impacts of the urban and suburban interface.”  
– Individual, Phoenix, Arizona

“Development within the monument should be limited and visitor services should be placed outside the monument in nearby communities.” – Individual, Ben Lomond, California

“Development in the monument should be limited, but visitor services should not be forced outside the monument.” – Individual, Rockwell, North Carolina

“Inappropriate development will degrade the integrity of wildlife habitat.” – Individual, Brooklyn, New York

## Issues to be Used in the Development and Analysis of EIS Alternatives

### *Issues Identified by the Public*

- Limit development within the monument.
- Limit new uses within the monument to those consistent with the monument Proclamation.
- Manage the urban-wildland interface to prevent encroachment.

### *BLM Management Concerns*

Concerns regarding land uses and development to be addressed in the plan, identified by BLM (but not necessarily other agencies or the public during scoping), are as follows:

- Develop a proactive approach to address urban interface issues.

### **3.3.8.4 Boundary Changes**

#### Planning Criteria

Pursuant to the Proclamation establishing the IFNM, “All Federal lands and interests in lands within the boundaries of this monument are hereby appropriated and withdrawn from all forms of entry, location, selection, sale, or leasing or other disposition under the public land laws, including but not limited to withdrawal from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposes of the monument.”

## Issues Overview

Comments received regarding boundary changes requested that BLM expand the IFNM boundaries to provided wildlife corridors connectivity with adjacent mountain preserves. Comments also requested that BLM consider the threat of future encroachment. Other comments asked that BLM does not consider any boundary changes.

## Representative Comments

“Help create a huge wildlife corridor by extending or connecting the Monument to the Tortolita Mountain Preserve.” – Individual, Tucson, Arizona

“The RMP should address the reality of administrating such an odd shaped parcel of land (irregular boundaries) with numerous in holdings as the ongoing threat of further encroachment.” – Individual, Phoenix, Arizona

“Don't do anything, don't disturb anything by adding buildings. Don't expand or explore in the Monument.” – Individual, Scottsdale, Arizona

“Do not consider or recommend any change to the boundaries of the IFNM.” – Individual, Coon Rapids, Minnesota

### **3.3.9 Special Area Designations**

#### Planning Criteria

Special area designations on public lands include national monument designations, ACECs, national trails, wild and scenic rivers, and backcountry byways. Special areas that may be considered in this plan include ACECs, national trails, backcountry byways, and other administrative designations that are consistent with federal law as well as policies and procedures. Management requirements for designated special areas will be identified in the plan.

Existing ACECs selected for continued management as ACECs will be managed with site-specific plans or guidelines established in the RMP. ACECs will be designated where special management attention is required to protect historical, cultural, or scenic values, natural resources or processes, or human life and safety.

## Issues Overview

Comments received related to special area designations generally requested stronger protection (e.g., ACEC designation) for sensitive areas.

## Representative Comments

”Protect areas with substantial significance such as significant historic, cultural or scenic values, rare or relic plant communities, important wildlife habitat, or special riparian and wetland areas.” – Individual, Minneapolis, Minnesota

“We strongly encourage designation of Areas of Critical Environmental Concern for an additional layer of protection for especially sensitive or dangerous areas.” – Individual, Cortaro, Arizona

## Issues to be Used in the Development and Analysis of EIS Alternatives

### *Issues Identified by the Public*

- Consider the importance of maintaining access to existing areas of economic activity (e.g., mines, ranches) when considering special management designations.
- Designate ACECs for protection of sensitive resources.

### *BLM Management Concerns*

Concerns regarding special management areas to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Consider special area designations, if appropriate, to achieve resource management goals.
- Determine the applicability of special area designations within a national monument.

### **3.3.10 Wilderness Characteristics**

#### Planning Criteria

Consistent with BLM policy, the Secretary of the Interior letter to Senator Robert Bennett (dated April 11, 2003), and the settlement in the case of Utah v. Norton (dated April 14, 2003), BLM has the authority to discuss and incorporate wilderness values into the land use plan, in accordance with the public process incorporated in all land use planning efforts. Thus, BLM is committed to listening to public input through the land use planning process and, where appropriate, managing specified areas of land for wilderness values. However, BLM has no authority to establish new wilderness study areas (WSAs) or to report such areas to Congress. BLM can protect areas in their natural state using a wide range of land use tools other than the WSA designation process. The BLM will review, through this planning process, lands within the planning area with that may possess remote or primitive characteristics.

#### Issues Overview

Comments regarding wilderness/wilderness characteristics focused primarily on the issue of designating or managing the IFNM as wilderness (or a WSA). Many comments urge BLM to adopt the Arizona Wilderness Coalition proposal for WSAs. Other comments in support of protecting wilderness values through the designation of WSAs state that such designation would protect sensitive wildlife, wildlife habitat, and cultural resources. Comments in opposition to new wilderness designations also were received. Some of these comments express the view that wilderness areas (or WSAs) are not needed within the IFNM, as the IFNM offers protection to the area already. Opponents of wilderness (or WSAs) stated that misguided management of wilderness in other locations has had a detrimental effect on wildlife, as it prohibits proactive management of resources.

#### Representative Comments

“The Arizona Wilderness Coalition (AWC) recommends the following four areas for consideration as Wilderness Study Areas in the Ironwood Forest National Monument (IFNM): Ragged Top, Silver Bell Mountains, West Silver Bell Mountains, and Sawtooth Mountains.” – Arizona Wilderness Coalition, Tucson, Arizona

“Closely scrutinize any attempt at creating more wilderness/roadless areas.” – Individual, Tucson, Arizona

“[Arizona Desert Bighorn Sheep Society] has witnessed the detrimental effects to wildlife caused by misguided wilderness management. We would not support recommendations for additional wilderness area designations within IFNM.” – Arizona Desert Bighorn Sheep Society, Inc., Phoenix, Arizona

### Issues to be Used in the Development and Analysis of EIS Alternatives

#### *Issues Identified by the Public*

- Recognize and protect outstanding wilderness resources and values.
- Provide protection for wilderness values, while allowing a reasonable range of recreational opportunities

#### *BLM Management Concerns*

The concern regarding areas with wilderness characteristics to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), is as follows:

- Consider wilderness characteristics when making land and resource allocations.

### **3.3.11 Visual Resources**

#### Planning Criteria

Laws, regulations, policies, and guidelines followed for visual resources will include, but not be limited to, Presidential Proclamation 7320, FLPMA, NEPA, Arizona Standards for Rangeland Health, and BLM’s Visual Resource Management Manual 8400.

A visual resource management classification will be conducted to address the public’s concerns about open space and natural vistas. Some areas may be subject to special measures to protect resources or reduce conflicts among uses. The monument will be managed to protect visual resources consistent with the purposes for which the monument was established.

#### Issues Overview

There were many comments that attest to the beauty of the land and the need to protect the natural landscape; several comments reference scenic views/open space. A large portion of the comments on visual resources stated that the threats to scenic values are development (urban sprawl and visitor facilities) and impacts of recreational use (in particular, off-road vehicle use). One commenter notes that lighting within the monument should be minimized.

#### Representative Comments

“The beauty of the land was meant for the quiet enjoyment of people.” – Individual, Wilmette, Illinois

“Inappropriate development in the monument can damage the integrity of wildlife corridors, migration routes, and access to forage. It also damages the experience of visitors who come to see natural landscapes, natural diversity, and to hear natural sounds and quiet.” – Submitters of a Form Letter

“One of the special qualities of this place is the sheer remoteness and openness of the landscape. Planning strategies that ensure these qualities remain a lasting resource will serve the burgeoning populations of the Desert Southwest as well as the nation as a whole.” – Arizona Chapter of the American Society of Landscape Architects, unspecified community

“I believe it is possible to set up a multiple use area within the IFNM while maintaining the natural beauty and cultural resources.” – Individual, Gilbert, Arizona

“We recommend the BLM vision statement for the National Monument convey the intent of Proclamation 7320 and, accordingly: Protect, conserve and restore the special values of the landscape including natural and cultural resources.” – Friends of the Earth, National Wildlife Federation, Sierra Club, The Wilderness Society, and U.S. Public Interest Research Group, and several individuals

### Issues to be Used in the Development and Analysis of EIS Alternatives

#### *Issues Identified by the Public*

- Protect the natural beauty and wildlife indigenous to the monument.
- Limit recreation, grazing, and road development to protect visual resources.
- Address how development could seriously damage natural landscapes.
- Protect the remoteness and undeveloped character of the monument.

#### *BLM Management Concerns*

Concerns regarding visual resources to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Protect visual resources, consistent with the protection the natural and cultural resources, by designating appropriate visual resource management classes.
- Rehabilitate disturbed areas that do not meet the visual resource management class requirements.

### Issues That Can Be Addressed Administratively

- Stripped and vandalized cars can be seen in the monument, and remain for long periods of time.

### **3.3.12 Recreation**

#### Planning Criteria

Laws, regulations, policies, and guidelines followed for recreation management will include, but not be limited to, Federal Land Policy and Management Act of 1976, Americans with Disabilities Act of 1990, Land and Water Conservation Fund, 43 CFR 8300, BLM Recreation Management regulations, 43 CFR 2930, BLM Special Recreation Permits regulations, BLM Manual 8300 – Recreation Management, Presidential Proclamation 7320, and the Arizona Standards for Rangeland Health.

The Presidential Proclamation, in designating management of the monument to the BLM, “pursuant to applicable legal authorities, to implement the purposes of this proclamation,” establishes that the FLPMA shall be the basic policy for management of the monument. Among other things, FLPMA requires management under the principles of multiple use and sustained yield and provides for outdoor recreation and use.

The RMP/EIS will set forth a framework for managing recreational and commercial activities in order to maintain existing natural landscapes and to provide for the enjoyment and safety of the visiting public. The lifestyles of area residents, including activities of grazing, hunting, and motorized use and recreation, will be considered in the plan.

### 3.3.12.1 General Recreation

#### Issues Overview

General recreation comments received refer to those comments that did not focus on just one type of recreational use (e.g., hunting). Several of the comments suggest that recreational activities should be limited to protect the resources in the IFNM from degradation. Other comments state that opportunities should be available for a variety of activities, including motorized uses. A large portion of the comments support the continuation of currently allowed recreational uses.

While some visitor use services issues are addressed here, Section 3.3.19 provides additional information about the facilities issues.

#### Representative Comments

“Recreational activities need to be appropriately managed, not just removed from the monument, so they do not compromise natural and cultural resources. The RMP should provide for reasonable vehicular access and promote dispersed recreation. These lands should continue to provide for multiple public uses including hunting, and other wildlife dependent recreational uses.” – Arizona Desert Bighorn Sheep Society, Inc.

“We support visitation and recreational use of the National Monument especially low impact activities carried out in a responsible fashion such as backpacking, bird watching, hunting, and fishing.” – Friends of the Earth, National Wildlife Federation, Sierra Club, The Wilderness Society, and the U.S. Public Interest Research Group, and several individuals

“The management plan must address this pressure [from visitors regarding recreational activities] by first determining which activities are compatible with protection of the Monument and its objects, allowing only those activities which have been determined to have no adverse impacts to the sensitive biological, geological and archaeological objects for which the monument was created.” – Individual, Tucson, Arizona

“BLM must also carefully plan and manage recreation opportunities that do not conflict with the protection of the monument objects, including the Sonoran Desert ecosystem itself.” – Arizona Wildlife Coalition et al.

“I encourage you to seek ways to provide suitable opportunities for both motorized and "quiet" recreation. Set aside periods of the year, week, or day for quiet recreation.” – Individual, Santa Fe, New Mexico

“[Recommend] passive recreational use such as horseback riding, hiking, bird watching, etc. within the Monument.” – Individual, Tucson, Arizona

“Development within the monument should be limited [and] recreational activities that can be carried out at many other locations should not be allowed within the monument.” – Individual, Santa Barbara, California

“Hiking should be strictly controlled as these people are filthy and leave trash all over any place they visit.” – Individual, Phoenix, Arizona

“Draft a management plan that puts protection first and foremost. This means no resource extraction (i.e. mining, grazing, or logging). This means minimal development of infrastructure (i.e. no more roads, close most existing roads, and no campgrounds or [recreational vehicle] dump stations, etc.). This especially means no off-highway vehicles.” – Individual, Tucson, Arizona

“Put the perpetuation of wildlife species ahead of human recreation.” – Individual, Mesa, Arizona

“Access should be restricted to cultural sites, however tours should be provided to those interested. Other areas roads should not be closed. People need to access to biking and hiking trails.” – Individual, Marana, Arizona

“Hikers leave trash and waste and have no respect for other people's right to visit our public lands. Hikers should be educated that they need to go on one of the many wilderness areas to hike.” – Individual, Phoenix, Arizona

“Hiking should be banned in this monument [because] the Border patrol cannot tell who is an American and who is an illegal Mexican criminal.” – Individual, Phoenix, Arizona

“BLM must monitor visitor uses and impacts and curtail or modify recreational uses that threaten to harm monument objects.” – Individual, unspecified community

“Recreation is part of a multi-use management plan. Limited use in the monument differs from limited use in a park or wildlife refuge. This is still BLM land, which is meant for public access.” – Individual, Avondale, Arizona

### Issues to be Used in the Development and Analysis of EIS Alternatives

#### *Issues Identified by the Public*

- Provide suitable opportunities for both motorized and "quiet" recreation.
- Limit recreation use to what is sustainable/protective of the national monument.
- Do not allow for recreational activities that can be carried out at many other locations.
- Protect IFNM from intensive/destructive/intrusive recreational use.
- Continue to allow hiking.
- Continue to allow hunting.
- Continue to allow mountain biking.
- Continue to allow camping.
- Continue to allow horseback riding.
- Continue to allow for and plan for dispersed recreational opportunities.
- Do not establish campgrounds/Recreational Vehicle (RV) facilities.
- Consider seasonal closures for Ragged Top and other areas during lambing and breeding seasons for bighorn sheep.
- Allow only those recreational activities that are compatible with the protection of the monument and its objects.
- Appropriately manage recreational uses rather than just prohibiting them within the monument.
- Monitor visitor use and impacts.
- Recommend passive recreational use such as horseback riding, hiking, bird watching, etc. within the monument.
- Prioritize the protection of monument objects/wildlife over recreation.
- Plan for all visitor use services to be established outside of the monument.

## *BLM Management Concerns*

Concerns regarding general recreation to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Establish criteria of unacceptable recreation use impacts and develop a monitoring plan.
- Evaluate appropriate Recreation Opportunity Spectrum classes or zones.
- Establish a specific policy for Special Recreation Permits including services, uses, and limitations, including commercial use permits and hunting/outfitting guide concessions.
- Develop criteria to guide issuance of Recreation Use Permits for individual use.
- Plan for the location, financing, and placement of a visitor center for the IFNM.
- Evaluate needs for visitor facilities on IFNM (besides a visitor center or signs).
- Address administrative policies regarding large group activities and the associated problems including refuse, woodcutting, off-road vehicle use, resource damage, and reckless motor vehicle operation (e.g., driving under the influence, collisions).
- Continue monitoring uses of visitors to understand use trends over time and modify management, as needed.

### Issues That Can be Addressed Administratively

- Control litter from recreational use.
- Educate the visiting public about the value of public lands and rules, such as rules of conduct for waste disposal (littering).

### **3.3.12.2 *Camping***

#### Issues Overview

There were a few comments regarding the management of camping within the monument. There were concerns that camping continued to be allowed in the monument with some specifying dispersed or primitive camping. Several comments suggest that campsites be designated in areas compatible with such use and in consideration of the transportation and access plans, and that the information about the designated campsites be provided to the visiting public.

#### Representative Comments

“Designated camping sites should not be developed, but must be clearly signed as campsites. Interpretive signs at the entrances to the monument must provide maps and information clearly showing the public transportation network and designated camping sites.” – Tucson Audubon Society, Tucson, Arizona

“Manage the monument to provide "designated dispersed camping." Designated existing dispersed camping sites that do not destroy native plants or interfere with the survival or travel of bighorn sheep, or other monument objects.” – Tucson Audubon Society, Tucson, Arizona

“Camping should be banned in the heart of the monument.” – Individual, Phoenix, Arizona

“All undesignated campsites should be rehabilitated in the same fashion as undesignated motorized travel was.” – Individual, Tonopah, Arizona

“Designate existing dispersed camping sites that do not destroy native plants or interfere with the survival or travel of bighorn sheep, or other monument objects.” – Individual, Tonopah, Arizona

“I would strongly suggest that the area be left "primitive," that no pavements, restrooms, or developed camping areas be created.” – Individual, unspecified community

“Please make sure access is preserved, hunting continues to be allowed and camping is still permitted.” – Individual, Glendale, Arizona

“Please designate a minimal road network. My wife and I car camp as she is handicapped; a few pullouts are always nice, we mean a few.” – Defenders of Wildlife et al.

“In this management plan, BLM [should consider] where there are appropriate sites for camping, where there will be no adverse impacts on the monument's sensitive biological and archaeological objects, and preferably where there are existing campsite footprints. BLM will need to consider providing adequate visitor information regarding these designated sites to direct visitors to these sites and away from less appropriate areas.” – Individual, Tucson, Arizona

### Issues to be Used in the Development and Analysis of EIS Alternatives

#### *Issues Identified by the Public*

- Continue to allow for camping.
- Continue to allow for dispersed/primitive camping.
- Address camping for handicapped.
- Rehabilitate undesignated campsites.
- Designate campsites in existing dispersed camping sites that do not conflict with resource management, but do not develop the sites. Provide adequate visitor information to direct visitors to the designated campsites.
- Ban camping in the heart of the monument.

#### *BLM Management Concerns*

Concerns regarding camping to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Consider guidelines for what is permissible in areas where vehicles are prohibited from driving off of established routes, particularly with regard to pulling off the road to camp or otherwise park vehicles.
- Address large-group camping.

### ***3.3.12.3 Hunting***

#### Planning Criteria

The plan will recognize the State's authority to manage wildlife, including hunting and fishing, within the planning area.

#### Issues Overview

Comments regarding hunting generally support continued hunting opportunities in the future. Some note the role of the AGFD in managing hunting and wildlife management. Many who support continued hunting, also support continued opportunities for other recreational uses, such as camping and OHV use.

## Representative Comments

“Hunting [should be permitted], by permit only, as we believe the proper restrictions are in place to do this responsibly.” – Individual, Marana, Arizona

“Maintain hunting and wildlife management by AGFD. Realize that hunting is the cornerstone of wildlife conservation.” – Individual, Tucson, Arizona

“Maintain hunting and reasonable access.” – Arizona Desert Bighorn Sheep Society, Phoenix, Arizona

“Please make sure access is preserved, hunting continues to be allowed and camping is still permitted.” – Individual, Glendale, Arizona

“Ensure future hunting on the monument.” – Individual, Tucson, Arizona

“Allow continued hunting of sheep and other big and small game under existing AGFD regulations.” – Individual, Scottsdale, Arizona

“We support visitation and recreational use of the National Monument especially low impact activities carried out in a responsible fashion such as backpacking, bird watching, hunting, and fishing.” – Friends of the Earth, National Wildlife Federation, Sierra Club, The Wilderness Society, and the U.S. Public Interest Group, and several individuals

“The EIS should address hunting/shooting opportunities.” – Individual, Tucson, Arizona

## Issues to be Used in the Development and Analysis of EIS Alternatives

### *Issues Identified by the Public*

- Continue to allow hunting by permit only.
- Maintain/ensure the future of hunting in the monument.
- Maintain hunting and wildlife management by AGFD.
- Realize that hunting is the cornerstone of wildlife conservation.
- Continue to allow hunting of the big game and small game species as well as predator and furbearers under existing AGFD regulation.

### *BLM Management Concerns*

Concerns regarding hunting to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Recognize that a hunting license is also one way to gain access to state lands in lieu of having a use permit.

## Issues That Can be Addressed Administratively

- Prevent illegal hunting.

### **3.3.12.4 Recreational Shooting**

#### Issues Overview

Recreational shooting is meant to describe target-shooting activities as opposed to hunting for game species. There are two general types of recreational shooting—dispersed target shooting by individuals or small groups of individuals using sporting firearms and organized shoots by large groups in a concentrated location using a wide variety of firearms, which may include fully automatic weapons. There were comments opposing recreational shooting within IFNM as well as comments supporting the continued opportunity for recreational shooting within IFNM. A large number of comments suggest that recreational shooting should be prohibited in certain areas and/or only permitted in certain designated areas. Those that support the prohibition or some form of restriction on recreational shooting cite concerns for resource protection and/or public safety. Some comments relate the recreational shooting issue to the transportation and access issue as well as other issues such as vandalism and litter.

#### Representative Comments

“As an avid hiker and amateur archaeologist, I'm annoyed at seeing shell casings, destroyed signs, and defaced petroglyphs, bullet ridden saguaro cactus and other evidence of unrestricted target shooters.”  
– Individual, Tucson, Arizona

“BLM should consider establishing some shooting areas or ranges.” – Individual, Sun Lakes, Arizona

“The EIS should address hunting/shooting opportunities.” – Individual, Tucson, Arizona

“Target shooting anywhere on the monument should be prohibited until such time as BLM is in a position to devote adequate resources and staff to its management.” – Defenders of Wildlife, Tucson, Arizona

“All shooting should be moved outside the monument.” – Individual, Prescott, Arizona

“Prevent target practice in or around the monument.” – Individual, Tucson, Arizona

#### Issues to be Used in the Development and Analysis of EIS Alternatives

##### *Issues Identified by the Public*

- Prohibit recreational shooting within IFNM.
- Prohibit recreational shooting near residential areas, ranching areas, roads, and popular visitor areas.
- Ban target shooting within the monument to protect monument wildlife and plant objects and to ensure public safety.
- Prohibit recreational shooting in resource sensitive areas (consider desert bighorn sheep).
- Prohibit automatic weapons use.
- Provide a designated shooting area or range within the monument.
- Restrict target shooting to one small designated shooting area or range within the monument.
- Consider using State and local funds available for developing a designated shooting area or range.
- Continue to allow recreational shooting throughout the monument where the law allows for it.
- Do not ban the use of firearms.
- Ensure an open space for shooting.

- Recognize that the U.S. Forest Service has already closed one shooting range in Tucson and that closing the monument to shooting would add to the reduction for this recreational opportunity in the area.
- Prohibit recreational shooting until BLM can devote adequate resources and staff to manage this activity.
- Consider recreational shooting in context of the transportation and access plan and other users, especially residences and ranches.

### *BLM Management Concerns*

Concerns regarding recreational shooting to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Recreational shooting has been a long-standing issue in the Tucson basin, but there has not been a lot of dialogue with the community or among land management agencies. The Udall Center for Studies in Public Policy is currently conducting a recreational shooting assessment for the entire Tucson basin, which identifies the community interests in, need for, and criteria to guide whether and where such activities should take place. The results of the Udall Center study will be incorporated into the RMP/EIS planning process.
- Adopt recommendations that result from the Tucson Basin Recreational Shooting Dialogue that address education, environmental issues, and safety.
- Educate the public about the impacts of recreational shooting, including damage to resources such as vegetation and cultural resources and shooting in an irresponsible manner such as across roads, toward buildings, etc. Efforts to inform the public that such actions are illegal and punishable by fine if caught have had some effect, but the problems with resource damage and concerns for safety persist.

### Issues That Can be Addressed Administratively

- Enforce existing laws regarding recreational shooting.
- Address inadequate law enforcement.

### **3.3.13 Transportation and Access**

The issues related to transportation and access touch on many of the multiple use and resource management issues as well as multi-jurisdictional concerns that will be addressed in the planning process for IFNM. Because of their interrelatedness, it is difficult to categorize the scoping comments regarding transportation and access into subtopics. However, for the purposes of this Scoping Report, this section has been divided into two discussions – one regards general access issues and the other more specifically addresses the transportation management concerns. General access issues are those that are related to access to specific areas (including public lands, State lands, inholdings, interest sites, etc.) within the monument boundaries and access to the monument as it relates to adjacent multi-jurisdictional lands.

#### ***3.3.13.1 General Access***

##### Planning Criteria

Laws, regulations, policies, and guidelines followed for general access will include, but not be limited to, Presidential Proclamation 7320, Land and Water Conservation Fund Act, 43 CFR 2200 (which provides for acquisition of easements), subsequent regulations in 43 CFR 8340, Executive Order 11644, and the Americans with Disabilities Act of 1990.

The RMP will include transportation and access needs for motorized and non-motorized uses, and all public lands will be designated as open, limited, or closed to motorized vehicles. The plan will designate a network of vehicle routes. Public safety, resource protection, current and future user access needs and conflict resolution will be considered in making these decisions. The BLM route inventory will provide a basis for considering route management.

### Issues Overview

Issues related to access include access points to the monument as well as access to and from adjacent lands and communities. Some comments regard access for a specific purpose or use. Multijurisdictional concerns were noted in relation to State and private lands located within the planning area as well as adjacent State, private, and Tohono O'odham Nation lands. Among those commenters that support continued access in some form or another, a strong sentiment that the public lands should be accessible to Americans was often noted. Some comments note general access concerns that principally regard the designation of special management areas and areas with wilderness characteristics; these comments are addressed in Section 3.3.9 and 3.3.10, respectively.

### Representative Comments

“Closing existing gates will lead to concentrated and congested use sites.” – Individual, Marana, Arizona

“Equal access to the wonders of the Sonoran Desert for children, the elderly, and the disabled [is necessary].” – Individual, Tucson, Arizona

“All Americans should have unlimited access to our beautiful deserts.” – Individual, unspecified community

“I support reducing the number of access points to the monument.” – Individual, Tucson, Arizona

“Protect, restore, and acquire desert bighorn sheep habitat, travel corridors, and lambing grounds. Institute seasonal closures for Ragged Top and other areas during breeding and lambing.” – Individual, Tucson, Arizona

“If these roads are closed the area will become inaccessible and virtually will be a wilderness. Multiple use activity in the past is what made this a desirable place for national monument designation. If you allow roads to be closed, you are denying the public access to their land.” – Individual, Tucson, Arizona

“Maintain reasonable access – don't restrict roads without accomplishing an outreach program and public review.” – Individual, Tucson, Arizona

“Foot traffic should have total access to non-road areas.” – Individual, Sahuarita, Arizona

“All wilderness areas and all federal and state land should be off limits to human intrusion for at least 20 years and afterwards access should be only on foot.” – Individual, Cottonwood, Arizona.

“I purchased land adjacent to BLM land solely because of the access to public lands for horseback riding.” – Individual, Marana, Arizona

### Issues to be Used in the Development and Analysis of EIS Alternatives

#### *Issues Identified by the Public*

- Coordinate designation of gates/access points with adjacent land owners/managers.

- Reduce the number of access points.
- Consider how closure of access points could lead to concentrated/congested use areas.
- Provide for convenient access to the road/trail system from adjacent private lands and communities.
- Consider equal access for children, the handicapped, and the disabled.
- Comply with provisions of the Americans with Disabilities Act that require consideration of access needs for special populations.
- Consider access to inholdings.
- Designate the Blanco Wash Trail south of Tucker Road and at the extreme south end of Blanco Wash through a small strip of city property and the Trico utility easement be used for public access.
- Allow foot access to all areas of the monument.
- Continue to allow for access for all groups of users.
- Do not allow a minority of the public ruin access for the majority of the public.
- Consider whether the planning for the monument will encourage the public to trespass on State land.
- Consider the importance of maintaining access to existing areas of economic activity including Silver Bell Mine and ranching as well as access to inholdings.
- Limit public access to the monument.
- Limit access to cultural resource sites.
- Consider seasonal closures for Ragged Top Mountain and other areas during desert bighorn sheep breeding and lambing season.
- All management problems can be directly or indirectly connected to access, particularly by motorized vehicles of all types.
- Limit access to portions of the Tohono O’odham Indian Reservation

### *BLM Management Concerns*

Concerns regarding general access to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Address legal access easements needed to secure public access and/or administrative access (including access points and transportation network) across State and private lands in order to secure access to public lands.

### Issues That Can be Addressed Administratively

- Provide opportunity for public review and input with regard to changes to access.

### ***3.3.13.2 Transportation***

#### Planning Criteria

Laws, regulations, policies, and guidelines followed for transportation will include, but not be limited to, BLM Manual 9110, Transportation Facilities, BLM Handbook H-9110-1, Transportation Planning Americans with Disabilities Act of 1990, Arizona Standards for Rangeland Health, 43 CFR 8340 – Off Road Vehicles, 43 CFR 8360 – Visitor Services, and BLM’s National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands.

Consistent with the Proclamation, all motorized and mechanized vehicle use off-road will be prohibited, except for emergency or authorized administrative purposes. The plan will designate a network of routes for motorized and mechanized vehicle use. Protection of the monument resources, public safety, current and future user access needs, and conflict resolution will be considered in making these decisions. The BLM route inventory will provide a basis for considering route management.

### Issues Overview

Transportation issues were among the most prevalent concerns raised during the scoping process. The comments ranged from simple statements about allowing or prohibiting off-road use to complex, legal arguments about how BLM should address transportation issues in the RMP/EIS process. Before further describing these comments, a few things should be noted about transportation terminology. While BLM generally uses the term OHV to refer to those types of vehicles that are capable of driving off road and OHV use as the act of driving that vehicle, the public comments used various terms, most frequently off-road vehicle and off-road vehicle use, but also all-terrain vehicles (ATV) and ATV use (which is a slightly more specific term since not all OHV/off-road vehicles would be considered ATVs), as well as use by jeeps, 4x4s, dirt bikes, etc. Comments regarding use under any of these terms sometimes seem to refer to the act of driving cross-country off of established roadways versus the use of these types of vehicles on established routes. The most difficult to interpret is the use of the term off-road vehicle because it could most easily be interpreted in various ways. Therefore, the terminology used by the commenters was left unchanged.

The majority of the comments were in favor of limiting or restricting motorized transportation by some means or another, most specifically motorized off-road use. The adverse impacts of driving off-road/off-road vehicle use to various natural and cultural resources were noted in many public comments opposed to off-road vehicle use. The specific concerns most prevalently noted were for desert bighorn sheep, cultural sites, and monument objects. Other concerns were for Harris hawk, desert tortoise, soils, hydrology, public health and safety, noise, driving in washes, and endangerment to private property. Many who suggest limiting vehicle routes also oppose uses such as mining, grazing, and rights-of-way development. Among those advocating limiting motorized vehicle use in some way, few suggest prohibiting the use altogether, although some do – more particularly with regard to ATVs than other types of motorized vehicles that have the capability to go off-road. There were several comments that note that Presidential Proclamation 7320 prohibits motorized and mechanized vehicle use off of roads. Resource concerns related to non-motorized vehicle trail uses were fewer, but there were concerns for the impacts of such uses to desert bighorn sheep as well as cultural sites.

While some comments advocate the minimum road network necessary for monument management, many advocate providing for reasonable access (usually with a caveat similar to “as consistent with the purpose of the monument”). Still others advocate leaving all existing trails open and some suggest the consideration of additional roads. Reasons cited in favor of retaining roads include recreational value, public safety, emergency response, fire control/fighting, economic benefit, and monument management issues related to criminal activity and sanitation. Many comments advocate non-motorized trail use, including mountain bike, equestrian, and hiking trails. A considerable number of comments encourage the development of a comprehensive recreation trail system that would consider motorized and non-motorized uses with suggestions such as separation between motorized vehicle use and other types of non-motorized recreation use/“quiet” recreation, as well as popular areas for recreational driving, mountain biking, hiking, equestrian use, etc. A transportation plan for IFNM was submitted by some monument residents, ranchers, and conservation groups.

In addition to management of the transportation network, there were substantial comments regarding management oversight of transportation use such as user education, providing signs and maps, and sufficient enforcement of transportation policy.

## Representative Comments

“The transportation plan that the BLM will write should leave open only those roads that are the minimum necessary for management of the monument. Other dirt tracks and trails should be closed to protect the objects of scientific and historic interest the monument is meant to safeguard.” – Submitters of a Form Letter

“Off-road vehicles are strictly prohibited on all but designated roads within the monument. You should close and restore all vehicle routes that threaten cultural and historic sites, fragment wildlife habitat, and endanger public safety and private property.” – Submitters of a Form Letter

“Protect the resources of the Monument by closing "outlaw" roads and making sure mining interests are prevented from damaging any part of the property that belongs to the American people.” – Individual, Tyler, Texas

“If taxes are collected in the state of Arizona for registration of off-road vehicles (like California) any revenue from green sticker funds from off-road funds should be more than adequate to create designated OHV riding areas including its maintenance.” – Individual, San Carlos, California

“Create a transportation system that provides reasonable access while upholding monument purposes. Close and rehabilitate all vehicle routes that threaten cultural and historic sites; fragment wildlife habitat; damage plants, soils, and local hydrology; and endanger public safety and private property.” – Individual, Tucson, Arizona

“Most people who travel to a national monument expect to see pristine lands, not tire tracks. Off-road vehicles are not compatible with the goals of national monument designation, therefore, unofficial roads should be closed and clearly marked.” – Individual, Fort Collins, Colorado

“I urge you to keep our national monuments wild and free of development, which includes new roads, new communication lines and off-road permits.” Individual, unspecified community

“Designate a transportation network that is consistent with the preservation purposes for which the Monument was created, retaining the minimum routes needed to provide reasonable access and closing extraneous or little-used routes.” – Individual, Minneapolis, Minnesota

“Off-road vehicles owners need to have a place to ride them.” – Individual, Rockwell, North Carolina

“ORVs need to stay away from sensitive areas.” – Individual, Santa Clara, California

“Protect the monument from off-road vehicles. They must be kept on designated trails only.” – Individual, unspecified community

“Travel [needs] to be restricted to vehicles that are necessary for monument management. This especially means no off-road vehicles.” – Individual, Woodland Hills, California

“Please consider revising your management approach to preserve public access to public lands, including motorized vehicle trails...I believe in equal access to the wonders of the Sonoran Desert for children, the elderly and the disabled, and this generally means via vehicle. Non-use public lands should be limited to selective areas where use has not previously occurred.” – Individual, Mesa, Arizona

“Fix the problems that threaten the Monument in the form of extensive off-road vehicle abuse, urban sprawl and overgrazing. Please ensure that the IFNM is managed for all people and all generations, not just the short-term interests of a few.” – Individual, Las Cruces, New Mexico

“I encourage BLM [to keep] existing routes open [and look] for opportunities to add routes.” – Individual, Tucson, Arizona

“Off-road vehicles are probably the most destructive factors in this area and should definitely be restricted to only designated trails.” – Individual, Mesa, Arizona

“I would like to see dirt roads and tracks closed and sensible travel restrictions applied to ORVs.” – Individual, Bethesda, Maryland

“Motorized vehicles are a nuisance and should be prohibited over all but a designated, small portion of the monument. That area should be where road development has occurred.” – Individual, Tucson, Arizona

“The Proclamation prohibits use of motorized and mechanized vehicles off-road.” – Individual, Alpine, Arizona

“A properly managed OHV trail system requires equal elements of education, communication, and design to prove successful.” – Individual, Tucson, Arizona

“We would like to see most of the trails stay open to recreational use on existing trails.” – Individual, Avondale, Arizona

“I enjoy hunting and OHV use in this area. I am concerned the Monument designation will limit access by motorized vehicles and limit hunting. Please do not close these public lands.” – Individual, Gilbert, Arizona

“Providing continued access through existing roads is also critical to safety, as well as management of the monument itself, including issues related to criminal activity, fire fighting, and sanitation.” – Individual, Marana, Arizona

“Based on the widespread, serious and long-lasting impacts associated with off-road vehicle use, developing an effective and legally sound travel management component of any Monument plan will be absolutely crucial to safeguarding the historic, scientific, and other objects of interest for which Ironwood National Monument was established.” – Individual, Missoula, Montana

“I support OHV access to the areas under consideration for closure. Most OHV users have gotten a bad rap – I am an avid believer in the “tread lightly” campaign. OHV users would think twice about leaving an existing trail if they knew they could receive a \$1,000 fine or have their OHV seized.” – Individual, Tucson, Arizona

“The Monument, particularly the Waterman and West Silverbell Mountains, are popular mountain bicycling areas, and [Sonoran Desert Mountain Bicycles] urges the BLM not only to preserve existing roads and routes used by mountain bicyclists, but to consider additional trails for non-motorized users.” – Sonoran Desert Mountain Bicycles, Phoenix, Arizona

“The U.S. Border Patrol exacerbates the problem with its own wildcat roads, an open invitation to destructive off-road vehicle use.” – Individual, Alloway, New Jersey

## Issues to be Used in the Development and Analysis of EIS Alternatives

### *Issues Identified by the Public*

- Create a transportation system that provides reasonable access while upholding monument purposes.
- Close and rehabilitate all vehicle routes that threaten cultural and historic sites; fragment wildlife habitat; damage plants, soils, and local hydrology; and endanger public safety and private property.
- Adopt the Ironwood Forest Transportation Plan submitted by conservation groups, monument homeowners, and ranchers.
- Establish a recreation trail system with designated access points that provides a range of opportunities for mountain bikers, hikers, and equestrians.
- Restrict motorized use to what is minimally necessary for maintenance of the monument.
- Provide for vehicular recreation in areas that are not as susceptible to long-term damage from such use.
- Make the roads safe.
- Allow access by only trucks, cars, and street bikes on designated roads only; prohibit all other types of motorized vehicles.
- Retain all major access roads as open to the public, including Avra Valley Road, Red Rock (SASCO) Road, Silver Bell (Marana Road), and El Tiro Wash Road near the Silver Bell Cemetery.
- Prohibit motorized access in all but a small portion of the monument where road development has occurred.
- Implement the directive from the Presidential Proclamation, which states that all motorized and mechanized vehicle use off road, except for emergency or authorized administrative purposes, should be prohibited for the purpose of protecting the monument objects.
- Consider the rights of OHV users; off-road vehicles owners need to have a place to ride them.
- Address control of and damage from ATV use.
- Consider leaving roads open for emergency response/access purposes and for fire control/fighting; safety; and monument management, including issues related to criminal activity and sanitation.
- Keep existing roads open and evaluate opportunities to add roads.
- Prohibit motorized vehicles in washes.
- Close roads not constructed by BLM through the NEPA process.
- Designate roads available for off-road vehicle use based on a set of objective and legally-based criteria, NEPA review, and public comment -- it can not merely adopt any or all "existing" travel ways as "designated" roads for the purpose of complying with the Proclamation.
- Do not use categorical exclusions to shield actions related to off-road vehicle use from NEPA review.
- Rehabilitate/restore closed roads.
- Retain roads and trails as defined by existing maps as open.
- Retain most of the trails open for public use.
- Do not close frequently used roads.
- Close all "wild"/"wildcat"/"outlaw" roads.
- Close dirt roads/tracks/trails.

- Designated routes as open, closed, or limited through the plan.
- Designate and sign roads as closed/open.
- Adopt a closed unless posted open policy that would allow off-road vehicles to be used only on roads specifically marked with signs as open to such vehicles.
- Impose travel restrictions on off-road use.
- Prioritize the protection of monument objects over providing/identifying recreation opportunities for off-road vehicle use through a route inventory process.
- Consider how roads can promote the spread of exotic species and trash.
- Do not allow organized motorized recreation events.
- Consider how revenues from State taxes of off-road vehicles may be used to create designated OHV riding areas including maintenance.
- Trail design and maintenance standards should be applied consistent with the desired level of use (primitive and non-motorized) and, thus, more use should be provided for riders, hikers, and mountain bikers.
- Differentiate roads from routes/tracks/trails.
- Anything identified as a road should meet the legal definition of a road as set forth in FLPMA.
- Preserve existing popular roads and routes used by mountain bicyclists, particularly the Waterman and West Silverbell Mountains, and consider additional trails for non-motorized users.
- Inform the public about accessible areas, roads designated open/closed.
- Educate the users using signs, maps, brochures, website, etc.

#### *BLM Management Concerns*

Concerns regarding transportation to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- The IFNM Proclamation requires preparation of a transportation plan.
- Determine a plan for road and trail maintenance.
- Address the fact that considerable illegal use occurs on existing roads and has resulted in significant trails or vehicle tracks where smuggling routes or undocumented immigrant pick-up areas occur.
- Current management limits use of motorized vehicles to “existing roads or trails,” or “designated roads and trails,” but these have not yet been identified.

#### Issues That Can be Addressed Administratively

- Take advantage of assistance being offered by local user groups and experts being offered for the development of a trail system.
- Enforce restrictions/limitations on OHV use.
- Keep off-road vehicles on designated routes only.
- Strictly enforce limitations on OHV use.

### 3.3.14 Social and Economic Conditions

#### Planning Criteria

The effects of proposed plan decisions will be evaluated for socioeconomic impacts. The impacts of decisions on disadvantaged communities will be evaluated, consistent with BLM's environmental justice policy and Executive Order 12898.

#### Issues Overview

The comments received on socioeconomics were few and varied widely. There were several comments about the monument's potential economic impact to the community. These comments suggest creating economic opportunities for surrounding communities by placing monument services (such as visitor center) in these communities. This would, according to the comments, foster stewardship and a sense of ownership of the monument while providing jobs and other economic benefits to the communities. Several other comments suggest weighing the economic benefits of mining, ecotourism, and access against conservation efforts that may negatively impact these potential economic benefits. Finally, comments were received outlining the importance of current mining operations on the community and the Arizona economy in general and were concerned that the management plan would limit access to economic development opportunities within the IFNM.

#### Representative Comments

"Please let us have a baseline assessment first of the flora/fauna which will be affected, the impact of off road vehicles and the economic impact of mining, development and vehicular traffic versus the economic importance of low impact ecotourism in this area." – Individual, Lakeland, Florida

"Visitor services should be placed outside the Monument in nearby communities which brings with it the added advantage of an economic boost to those towns." – Individual, Austin, Texas

"According to the Western Economic Analysis Center, Silver Bell has a direct impact on the Arizona economy of \$24.5 million and indirect economic impact of state of \$74.5 million for a total economic benefit to the state of \$99 million. The scoping process must take into account the important contribution the Asarco Silver Bell Mine makes to the local, state and national economies. Particular emphasis should be placed on these economic contributions in developing elements of the management plan that would potentially negatively impact the mine's operations and its ability to expand and develop new mineral reserves." – Individual, Marana, Arizona

"We recommend the BLM vision statement for the National Monument convey the intent of Proclamation 7320 and, accordingly: [Build community relationships to foster cooperative stewardship. For example, locating visitor services in surrounding communities builds ownership within those communities for the long-term protection, conservation, and restoration of the landscape and creates economic opportunities for citizens]." – Friends of the Earth, National Wildlife Federation, Sierra Club, The Wilderness Society, and the U.S. Public Interest Research Group, and several individuals

#### Issues to be Used in the Development and Analysis of EIS Alternatives

##### *Issues Identified by the Public*

- Recognize how these lands contribute to the social and economic welfare of local residents and industry.
- Recognize that mining contributes to local and regional economies, and efforts to limit these activities may have negative effects on the economy.

- Consider a cost/benefit analysis of the economic potential of the lands versus the intrinsic value of the lands.

### *BLM Management Concerns*

Concerns regarding socioeconomics to be addressed in the plan identified by BLM (but not necessarily by the public or other agencies during scoping) are as follow:

- Ensure planning decisions do not disproportionately impact disadvantaged communities consistent with BLM’s environmental justice policy and Executive Order 12898.

### **3.3.15 Cultural Resources**

#### Planning Criteria

Laws, regulations, policies, and guidelines followed will include, but not be limited to, Presidential Proclamation 7320, FLPMA, NEPA, Arizona Standards for Rangeland Health, National Historic Preservation Act of 1966, Archaeological Resources Protection Act of 1979, Executive Order 11593, and Executive Order 13007.

Identify cultural and paleontological resource localities and manage them for public, scientific, and cultural heritage purposes. Conserve and protect designated cultural and paleontological resources for future generations. Fulfill responsibilities to appropriate Native American groups regarding heritage and religious concerns. Cultural and paleontological resources will be managed to maintain or enhance significant scientific, educational, and recreational values. Cultural resource sites that meet National Register criteria will be protected and managed as eligible sites. Coordination with the Arizona SHPO will be conducted throughout the plan.

#### Issues Overview

Nearly all of the comments received pertained to cultural resources concerning the need to recognize and protect these resources. Some comments stress the importance of giving cultural resource protection high priority. Several recommend that a cultural resources inventory be conducted in the monument. A large number of the comments indicate concern with travelways providing unnecessary access to potentially sensitive cultural areas. Many suggest closing travelways that lead to or near sensitive cultural sites. Some comment concerning off-road vehicle use in the area specifically state that off-road vehicles threaten and destroy resources. Many of these comments support closing vehicle routes in areas sensitive in nature. A few of those who commented were concerned about other activities within the monument endangering cultural resources such as grazing, camping, and the presence of undocumented immigrants. Some comments indicate the need to consult with tribes regarding the importance of cultural resources in the area. Several comments refer to the Arizona Wilderness Coalition proposal to incorporate WSAs in the monument and suggested that WSAs would be a way to protect cultural resources. No comments were received pertaining specifically to paleontological resources.

#### Representative Comments

“The transportation plan BLM is required to write should leave open only those roads that are the minimum necessary for management of the monument. Other dirt tracks and trails should be closed to protect the scientific, historic, and biological resources that the Monument is meant to safeguard.”

– Individual, Anchorage, Alaska

“Please do a cultural inventory of monument.” – Individual, Tucson, Arizona

“Incorporate Arizona Wilderness Coalition proposal for Wilderness Study Areas; Ragged Top, Silver Bell Mountains, West Silver Bell Mountains, and Sawtooth Mountains. Wilderness is the strongest form of multi-species protection, and an excellent way to protect the natural and cultural objects for which the monument was created.” – Individual, Tucson, Arizona

“ORVs are strictly prohibited on all but designated roads within the monument. You should close and restore all vehicle routes that threaten cultural and historic sites, fragment wildlife habitat and endanger public safety and private property.” – Individual, Thornton, Colorado

“Consult with local tribes on important cultural areas and sites. Fund surveys and mapping of archaeological sites and sensitive areas within the monument.” – Individual, unspecified community

“Undocumented immigrants impact cultural resources.” – Individual, Prescott, Arizona

“Livestock should be removed from areas where they compete with monument wildlife objects, such as in critical rare cactus habitat and bighorn sheep lambing grounds, and should be removed from areas where they pose a significant threat to cultural and historic resources.” – Individual, Tucson, Arizona

### Issues to be Used in the Development and Analysis of EIS Alternatives

#### *Issues Identified by the Public*

- Give priority to archaeological site protection because of their vulnerability and sensitivity to vandalism.
- Close travelways to or near sensitive cultural sites.
- Evaluate the impact of grazing, camping, and off-road vehicle use on cultural sites.
- Identify tribes that may have interest in cultural resources in the area.
- Evaluate the inclusion of WSAs in the monument and their impact on cultural resources.
- Assess the impact of undocumented immigrants on cultural resources in the monument.
- Protect cultural resource sites from looters, thieves, artifact collectors, etc.

#### *BLM Management Concerns*

Concerns regarding cultural resources to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Assign appropriate use categories for cultural resource sites, consistent with BLM Manual 8110, Identifying Cultural Resources.
- Identify sites suitable for public interpretation, while maintaining appropriate protection for the site.
- Consider how to best manage cultural and paleontology sites in areas where extensive recreational uses occur.

#### Issues That Can Be Addressed Administratively

- Conduct an inventory to identify, locate, and evaluate cultural and paleontological resources because without an accurate and complete resource database, even well-intentioned actions may prove destructive. Seek citizen volunteers to help with the inventory if BLM’s budget cannot accommodate the inventory.

### **3.3.16 Native American Issues**

#### Planning Criteria

Native American tribal consultations will be conducted in accordance with policy and tribal concerns will be given due consideration. The planning process will include the consideration of any impacts on Indian trust assets.

#### Issues Overview

Very few comments were received relating to Native American issues. Several comments suggest consulting with tribes on the importance of cultural resources in the monument. Another comment suggests evaluating access to and from the Tohono O'odham Nation.

#### Representative Comments

“The EIS should address access to and from the TON [Tohono O’odham Nation].” – Individual, Tucson, Arizona

“Consult with local tribes on important cultural areas and sites. Fund surveys and mapping of archaeological sites and sensitive areas within the monument.” – Individual, unspecified community

#### Issues to be Used in the Development and Analysis of EIS Alternatives

##### *Issues Identified by the Public*

- Consult with tribes when evaluating the cultural resources within the IFNM.
- Evaluate access issues involving the Tohono O'odham Nation.

##### *BLM Management Concerns*

Concerns regarding Native American issues to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Coordination with all tribes interested in the monument including but not limited to, Tohono O'odham Nation, Ak Chin Indian Community, and Gila River Indian Community, and involve tribes in the planning process and decisions to be made.

#### Issues That Can Be Addressed Administratively

- Consult with tribes when evaluating the cultural resources within the IFNM.

### **3.3.17 Law Enforcement and Undocumented Immigrants (including Public Safety)**

#### ***3.3.17.1 Law Enforcement and Public Safety***

##### Planning Criteria

The plan will develop a framework to protect public health and safety, including addressing hazardous sites and activities; incorporating requirements to meet the Clean Air Act, Clean Water Act, and other environmental laws and regulations; and considering other potential hazards.

## Issues Overview

Law enforcement issues identified by the public focused on off-road vehicle traffic, recreational shooting, resource damage, trash (including both littering and dumping), and undocumented immigrants. Most of the comments noting public safety as an issue were submitted from various individuals in one of the form letters. Additional letters, which varied from the form letter, include similar language indicating that vehicle routes that endanger public safety should be closed and restored. In addition, many comments state that additional law enforcement is needed in the IFNM, with respect to existing permitted activities. Other comments note that recreational shooting poses a hazard to public safety. The few comments regarding undocumented immigrants, which suggest illegal immigrants harm the land and resources, are described more completely in the next section.

## Representative Comments

“There is damage occurring from undocumented alien traffic, drug smuggling, Border Patrol use, off-road driving, shooting, littering, wildcat dumping, etc. Current law enforcement is woefully inadequate and this issue must be addressed immediately and in a manner consistent with the mandate laid out in the proclamation.” – Individual, Arizona City, Arizona

“You should close and restore all vehicle routes that threaten cultural and historic sites, fragment wildlife habitat, and endanger public safety and private property.” – Submitters of a Form Letter

“The Management Plan [should] include a section on Ranger Safety, specific policies for Rangers working with other agencies, and emergencies procedures as they relate to the unique situation and circumstances of the Ironwood Monument.” – Individual, unspecified community

“Enforcement of the restrictions already in place [is] necessary.” – Individual, unspecified community

“Prevent target shooting near residential areas, ranching areas, and popular visitor areas and protect monument residents, visitors, landscape, archaeology and wildlife by diverting flow of illegal cross-border traffic and accompanying law enforcement activities to areas outside the monument.” – Individual, Tucson, Arizona

“BLM must consider the likelihood, for the life of the plan, of adequate law enforcement rangers and resources staff to regularly patrol, monitor, and enforce permitted activities on the monument.” – Center for Biological Diversity, Tucson, Arizona

## Issues to be Used in the Development and Analysis of EIS Alternatives

### *Issues Identified by the Public*

- Have park rangers and safety patrols.
- Ban shooting within the monument to protect public safety.
- Close roads that threaten public safety.
- Increase the presence of law enforcement in the monument.
- Increase enforcement of existing laws.
- Restrict target shooting to safe and nondamaging locations.
- Address trespass, vandalism, and other illegal issues.
- Consider BLM’s ability to monitor and enforce permitted activities.

## *BLM Management Concerns*

Concerns regarding public health and safety and law enforcement to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Identify and consider safety issues at historic mine sites, which are often popular visitor destinations.
- Consider the increasing concern regarding undocumented immigrant traffic and smuggling activities on the public lands relative to public and employee safety.
- Determine what level of maintenance should be provided on roads to maintain access and to protect both public safety and natural and cultural resources.
- Consider appropriate management of sites and areas that pose a threat to public health and safety, whether man-made or natural (e.g., rocky cliff areas).
- When developing resource management objectives, consider the need for an enforcement aspect, including developing appropriate penalties.
- Enforce federal laws and regulations pertaining to use, management, and development of the public lands and their resources. Particularly, evaluate options to effectively enforce vehicle laws.

### Issues That Can Be Addressed Administratively

- Address the need for more law enforcement to address illegal activities (e.g., cross-country vehicle travel).
- Address the need for an adequate number of rangers for the number of visitors.
- Secure staff and funding needed to enforce rules and regulations.

### ***3.3.17.2 Undocumented Immigrants and Smugglers***

#### Planning Criteria

No issue-specific planning criteria have been identified for law enforcement regarding undocumented immigrants and smugglers.

#### Issues Overview

Less than two dozen comments indicated that undocumented immigrants are an issue in the IFNM. A majority of the comments acknowledge that some type of resource damage or trash dumping is occurring from undocumented immigrants or Border Patrol activities. Several of the comments state that BLM should increase law enforcement and eliminate illegal immigrant use of lands in the monument.

#### Representative Comments

“Plan and ensure that no illegal immigration is allowed using monument territory.” – Individual, Newport, Pennsylvania

“All Border Patrol activities within the monument must cease immediately unless it can be conclusively demonstrated that their activities have either a zero or a positive net effect upon the cultural and natural resources of the monument.” – Individual, Arizona City, Arizona

“Open the border to day labor immigrants.” – Individual, Tucson, Arizona

“A complete revision of the current US Border Policy which forces migrants into the most remote regions of the southwestern U.S. is needed.” – Individual, Tucson, Arizona

### Issues to be Used in the Development and Analysis of EIS Alternatives

#### *Issues Identified by the Public*

- Address the trash left behind by undocumented immigrants and drug smugglers.
- Lessen impacts on resources by undocumented immigrants and Border Patrol activities.

#### *BLM Management Concerns*

Concerns regarding undocumented immigrants and drug smuggling to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Collaborate with other agencies to address the impacts on resources caused by undocumented immigrants and drug smugglers.
- Develop strategies to encourage undocumented immigrants to remain on existing roads, to not litter, and to protect and respect natural resources.
- Undocumented immigrants and drug smugglers often drive vehicles off of roads, leave behind trash, and burn campfires. This has resulted in management concerns including resource damage (to soils, vegetation, wildlife habitat, cultural resources, etc.), unsanitary human waste disposal, costly clean-up of trash, and the potential for wildfire.
- Safety is another significant management concern. Undocumented immigrants are frequently ill-prepared for the harsh environmental and climatic conditions they encounter, particularly in the summer. This can result in the need for search and rescue operations. Recently, the illegal activities also have resulted in an increased concern for employee and visitor safety as drug smugglers and guides leading the undocumented immigrants (also known as coyotes) have been carrying and sometimes using lethal weapons.

### Issues That Can Be Addressed Administratively

- Address the undocumented immigrants (and drug smugglers) and their impacts on the land.
- Address impacts of border law enforcement on the land.

### **3.3.18 Hazardous Materials**

#### Planning Criteria

Laws, regulations, policies, and guidelines followed for hazardous materials will include, but not be limited to, Presidential Proclamation 7320, FLPMA, NEPA, and the Resources Conservation and Recovery Act of 1986.

#### Issues Overview

Very few comments were received relating to hazardous materials issues. One comment received suggests that recreational shooting in the monument is damaging to natural resources in the area and can create waste products (that contain lead). Several comments address concern for hazardous materials management associated with mining operations, including transport and spill response management.

## Representative Comment

“There is serious ecological damage to the cactus and other plants and the trash and targets are often hazardous in nature.” – Individual, unspecified community

## Issues to be Used in the Development and Analysis of EIS Alternatives

### *Issues Identified by the Public*

- Evaluate extent of recreational shooting and damage in the monument, including waste from shell casings and target remnants.
- Consider management of waste (including with lead content) in locating a designated shooting area within the monument.

### *BLM Management Concerns*

Concerns regarding hazardous materials to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Evaluate the extent and damage of hazardous materials dumping within the monument.
- Address that industry, such as the Silver Bell Mine has the potential for chemical spills that may affect the monument and its resources.
- Address compatibility concerns on travel routes used to transport chemicals for mining operations and increasing public traffic.

## Issues That Can Be Addressed Administratively

- Manage illegal dumping with BLM law enforcement personnel.

### **3.3.19 Facilities and Education**

#### Planning Criteria

The RMP will consider what facilities are needed to provide visitor safety, information, interpretation, and disabled access. Laws, regulations, policies, and guidelines followed for facilities will include, but are not be limited to, Presidential Proclamation 7320, FLPMA, NEPA, Americans with Disabilities Act, Rehabilitation Act, and Architectural Barriers Act.

#### Issues Overview

A majority of the comments that were received on facilities oppose placement of any visitor facilities within the monument boundaries. Many of these comments suggest putting visitor facilities in nearby communities that already are developed, which would provide an economic benefit to the respective communities. A few comments suggest that facilities (or development) should not be definitively excluded from within the monument.

#### Representative Comments

"Visitor services such as visitor centers, restroom facilities, interpretive exhibits, and signage should be designed to match not only the level of visitation desired, but also the level of maintenance and staffing available to BLM." – Arizona Chapter of the American Society of Landscape Architects

“All visitor facilities, where possible, should be located in nearby local communities.” – Friends of the Earth, National Wildlife Federation, Sierra Club, The Wilderness Society, U.S. Public Interest Research Group, and several individuals

“Road construction and concessionaires such as gas stations, lodges and restaurants should be limited or excluded from the monument.” – Individual, Fort Collins, Colorado

“Development in the monument should be limited, but visitor services should not be forced outside the monument.” – Individual, Rockwell, North Carolina

### Issues to be Used in the Development and Analysis of EIS Alternatives

#### *Issues Identified by the Public*

- Place visitor services outside the monument.
- Do not limit visitor services to locations outside the monument.

#### *BLM Management Concerns*

Concerns regarding facilities to be addressed in the plan, identified by BLM (but not necessarily by other agencies or the public during scoping), are as follows:

- Determine which, if any, facilities are needed within the IFNM for administrative purposes (e.g., law enforcement or public safety).
- Determine where facilities can be placed to promote partnerships within the community.
- Establish criteria to guide permitting of research coordination, and related educational activities to further the purposes of the IFNM.

### Issues That Can Be Addressed Administratively

- Determine what resources should be allocated for interpretation and environmental education.

## **3.4 RMP/EIS Process**

A review of the comments indicate a strong desire for the protection of the rich biological diversity and integrity of the IFNM through inventory, assessment, and monitoring. This includes cultural resources, roads, native and endangered species, wildlife habitat, wildlife migration patterns, rangeland conditions, trails, and utility corridors. The ability to store all of this information in a spatial format (i.e., geographic information system [GIS]) also was suggested as a practical and effective method to enhance the planning process, and protect the IFNM for future generations. Conducting baseline studies, continually monitoring all resources within the IFNM, and assessing the conditions on a regular basis could eliminate deterioration of resources within the IFNM.

Other comments suggest both using and not using any portion of previous planning documents for the area. The justification for not using the previous documents is that management plans are outdated and irrelevant, especially given the designation of the IFNM. Justification for using previous documents includes that certain elements worked well, and therefore, should be preserved in the new RMP/EIS.

Partnering with universities and private institutions to assist BLM in research purposes also was suggested as part of the RMP/EIS process. This approach would be a collaborative working relationship, creating a win-win situation for all involved. BLM would obtain data required to complete the RMP/EIS, and researchers would gain practical experience.

Ensuring broad-based public participation throughout the planning process also was a noted concern. Several comments indicate BLM should consider comments equally, despite the geographic origin of the comment. Local input was acknowledged as important, but should not be considered more valid than a comment given from an individual thousands of miles away from the IFNM.

The remaining comments regarding the RMP/EIS process varied. Some comments indicate that before doing an inventory of roads, BLM must first define what constitutes a road within the IFNM. Other comments suggest the RMP/EIS should maximize access while preserving the resources within the IFNM.

### **3.5 Collaboration**

A few of all comments received were directed specifically at BLM's collaboration with other federal agencies, state agencies, tribes, individuals, or groups. These comments encourage the BLM to continue working proactively with AGFD, private landowners adjacent to the IFNM, and other interested parties to establish a plan consistent with regional resource objectives. Another viewpoint expressed is that the creation of the IFNM should not result in changes to the successful work BLM has already conducted in the area.

Comments also document the need for BLM to continue working with local businesses, mainly mining and utility companies that own property within the IFNM. Letters received from Tucson Electric Power and Asarco indicate the importance of the designation of the IFNM and the need to protect the resources within the monument. Frequent communication between BLM and these companies can help ensure an effective working relationship and protection of the IFNM. Some comments reflect the community's desire to participate with management of the IFNM, by offering to assist BLM with management activities (e.g., trash clean up).

In addition to comments received, BLM identified management concerns related to collaboration, particularly with respect to community partnerships. BLM recognizes that there is a need to address how multiple agencies and organizations will participate in the management of the IFNM.

### **3.6 Decisions Anticipated To Be Made**

In accordance with the FLPMA, BLM is responsible for balanced management of public land and its resources based on the principles of multiple use and sustained yield. Management direction is provided by a land use plan, in this case an RMP. The RMP is developed to determine decisions regarding appropriate multiple uses and allocation of resources, develop strategy to manage and protect resources, and establish systems to monitor and evaluate the status of resources and effectiveness of these management practices over time. Also, the management direction developed through the planning process needs to be adaptable to changing conditions and demands over the life of the RMP. Development of the RMP will be in accordance with the guidance set forth in BLM *H-1601-1 – Land Use Planning Handbook*.

The IFNM planning process also must take into consideration Presidential Proclamation 7320, which defines for IFNM "objects of scientific and historic interest" that must be protected and lists actions needed to protect IFNM resources. It also reserves all federal lands within the boundaries and withdraws all lands in IFNM from disposal under public land laws and continues many current uses and authorities.

In anticipation of this planning process, BLM developed an initial list of questions that reflect the kinds of decisions that will need to be made. These planning questions can be found in BLM TFO's Pre-Plan Analysis for the IFNM dated February 9, 2001, which is available for review at the TFO.

In light of the public scoping process and the resource-specific planning criteria, public issues, and BLM management concerns identified in Section 3, the key planning questions identified to be addressed in the development and analysis of RMP/EIS alternatives (in no particular order) are as follows:

- How does BLM's management need to be adjusted in order to implement the purposes of the monument Proclamation?
- How can BLM protect the natural and cultural resources of the monument consistent with the Proclamation and continue to meet existing and future demand for use of public lands and resources, pursuant to applicable legal authorities?
- How can potential conflicts and inconsistencies associated with the intermixed land ownership of the monument be minimized through integrating management with agencies and individuals that have jurisdiction or responsibility for management of lands in or near the monument?
- How can BLM allow and manage for public use and enjoyment, including recreation and access, while meeting requirements, goals, and objectives for resource management?
- What can BLM do to address urban interface issues?
- What facilities and infrastructure are needed to provide visitor services and administration of IFNM?

### **3.7 Existing Management To Be Carried Forward**

BLM-administered public land in the planning area is managed with direction from two documents: Phoenix Resource Area RMP (1989) and Eastern Arizona Grazing EIS (1992). Since these plans were implemented 11 to 14 years ago, numerous changes have occurred in the area that require reconsideration of certain management decisions. BLM has determined that some of the existing management decisions are not current with changing circumstances, demographics, resource conditions, and/or policy (e.g., fire management, noxious weed management, energy production and transport). In addition, the designation of the IFNM necessitates the development of an RMP specific to management of the monument's resources.

Based on demonstrated experience, many elements of the existing plans work well and remain valid, and BLM intends to carry these management decisions forward. Determining which existing management decisions will be carried forward is a part of the planning process. As part of the Management Situation Analysis, BLM will review the existing condition of the environment, review the existing management situation, and identify which existing management decisions should be carried forward and where there are opportunities to modify existing management direction and/or develop new management direction.

## SECTION 4.0 – DATA

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### 4.1 Data Summary

The TFO staff has identified data that are required to address resource and use issues and develop and analyze impacts of plan alternatives. These are summarized below. In many cases, existing resource information available in the BLM TFO will be used in formulating resource objectives and alternative management actions. Much of the data, however, will have to be updated, compiled, and converted into digital format (e.g., GIS) for use in the planning process and for development of resource maps for the plan. GIS files are the building blocks to quantify resources, create maps, and manipulate information during alternative formulation, especially the preferred alternative.

In addition to existing information, new data also are needed in a number of areas to provide the baseline resource condition information. The RMP may recommend that certain additional resource data be gathered in implementing an action, or gathering data may be a recommended action. All GIS data developed for the RMP will meet the data and metadata standards identified by BLM as appropriate. The projected data needs by issue/concern are described in the following sections. Where BLM is identified as developing data, BLM may choose to contract for that data development.

#### 4.1.1 Water Source and Use Assessment

Water source and use assessment baseline data are needed to assess valid existing rights and resources available to support IFNM purposes. The sources for these data include Arizona Department of Water Resources (ADWR) water rights and well databases and GIS data, and Phoenix Field Office and TFO water rights paper files and electronic files. Water rights are currently specified by 1/4 and 1/16 sections on paper maps, paper files, and ADWR GIS data. BLM will convert any necessary data for the planning process into a GIS format.

#### 4.1.2 Wildlife

In order to manage wildlife species effectively, it is necessary to have a clear understanding of the status and distribution of the species present within IFNM. This understanding will be enhanced by literature searches of recent studies to be found at the University of Arizona (U of A) and the Arizona Sonora Desert Museum (AZSDM), and by fieldwork to do wildlife inventories. BLM will digitize polygons at a scale of 1:100,000.

The impacts of increased human-use disturbance on wildlife populations are a major concern and data are required to determine the upper limits of these disturbances (limits of acceptable use). U of A researchers will gather these data and sensitive area polygons will be digitized at a scale of 1:100,000.

A portion of the IFNM contains proposed critical habitat for the cactus ferruginous pygmy-owl, with other areas potentially containing suitable habitat for this species. Baseline data will be needed to determine the quality of the habitat and the presence or absence of the pygmy-owl. These data are essential for proper management of this endangered species. These data will be obtained by fieldwork and presented as polygons digitized at a scale of 1:100,000. Field sightings and nests will be at a scale of 1:24,000. Similar field studies to determine the habitat quality and presence or absence of lesser long-nosed bats and desert tortoise will be conducted and reported on the same map scales. Personnel of U of A, AZSDM, and AGFD will conduct field studies and prepare GIS data.

Finally, IFNM contains the last viable population of desert bighorn sheep within the Tucson Basin. Baseline data to determine habitat quality, distribution, and migration patterns of these sheep will be

conducted by AGFD and reported as polygons at a scale of 1:100,000 with field sightings at a scale of 1:24,000.

#### **4.1.3 Vegetation**

In order to manage vegetative communities effectively, data are needed to determine the status and distribution of these communities, including exotic/introduced species. These data will be gathered using literature searches of recent studies (U of A and AZSDM) and through vegetation inventories by AZSDM. Results will be reported as polygons at a scale of 1:100,000.

Three vegetation species (saguaro, ironwood, and paloverde) are extremely important in the IFNM. Data are needed to determine whether management objectives are compatible with acceptable levels of regeneration to sustain these species. These data will be supplied through contracts with U of A and AZSDM as management zone polygons digitized at a scale of 1:100,000. These two contractors will supply similar data for fire assessment and natural history studies of the ironwood forest vegetative community.

#### **4.1.4 Transportation Management**

Data will be provided by U of A contracts to evaluate the existing route system using United States Geological Survey (USGS) digital orthophotography, other maps, on the ground verification, and road condition evaluations. BLM will digitize all existing routes and their condition for inclusion in the GIS system.

#### **4.1.5 Facilities Management**

Field data and data from BLM records will be used to determine existing facilities within the IFNM, their condition, access potential, and maintenance needs. Global positioning system (GPS) data will be collected by BLM, as necessary.

#### **4.1.6 Recreation**

Data are required to identify recreational visitor characteristics, use areas, and specific sites in order to develop management that reflects current activities, preferences, and perceptions. These data will be collected in the field and with visitor surveys by BLM personnel and U of A contractors. GIS data of user zones will result from BLM and U of A efforts.

#### **4.1.7 Land Ownership**

In order to conduct basic planning and ensure notification of interested parties about the ongoing planning effort, it will be necessary to determine current surface and subsurface ownership within the planning area and adjacent areas. This will be accomplished by BLM by using master title plats and county records, which will be digitized into the correct GIS format. For accurate township and range lines, section lines, and general resource assessments, Arizona Land and Resource Information System (which is at a scale of 1:24,000) will be used.

#### **4.1.8 Cultural Resources**

Only about 2 percent of IFNM has been surveyed for cultural resources. In order to accomplish IFNM planning goals, it will be necessary to do Class I and II surveys. In some specified areas, Class III surveys will be conducted. U of A researchers will use GIS technology to map site locations; U of A researchers will submit the information to AZSITE (Arizona Archaeological Site and Survey Database).

#### **4.1.9 Geology and Minerals**

Data collection is required for geologic resources and for determining the location of existing mining claims and saleable mineral resources for planning purposes. These data will be obtained from the Arizona Geological Survey, TFO, BLM Arizona State Office, and Pima and Pinal County Recorder offices, and digitized to either a scale of 1:24,000 or 1:100,000, whichever meets data requirements.

#### **4.1.10 Wastes and Hazardous Materials**

Data on wastes and hazardous materials will be collected to identify where they occur on IFNM. This will be accomplished by BLM via field reconnaissance, and locations will be identified and documented using GPS.

#### **4.1.11 Unlawful Activities**

In order to plan for effective law enforcement within the IFNM, data will be collected on the number and kinds of illegal activities that occur and where they occur. Patterns and trends of these activities, including dumping and resource theft, will be mapped. These data can be obtained from the LawNet database, paper case files, reports, and citations.

#### **4.2 GIS Data Inventory**

Table 4-1 presents the data BLM have gathered to date and those data that are missing, but needed for the RMP.



Table 4-1 – GIS Data Inventory

Data Description	Coverage Name	Format	Data Source (if not BLM)	Notes, Contacts, Collection Method
<b>Base Data</b>				
DRG's				URS Data Library
DEM's				
DOQQ's				URS Data Library (Pima County Only)
Aerial Photography				
Topography				URS Data Library
County Boundaries	Azcountybnd	shape		URS Data Library
BLM Field Office Boundaries	Azfos697a	shape		URS Data Library
PLSS	Azsecplss:trplss	shape		URS Data Library
Planning Area Boundary	ifnmgcbbdy: IRONWOODPAB	shape		
Decision Area Boundary				
<b>Lands &amp; Access</b>				
Surface Land Ownership	ifnmlst:ltr	shape		ownership with local edits to update known errors in the FO
ROW Exclusion/Avoidance Areas				
ROW Corridors				
Border Patrol Areas				
City Boundaries				URS Data Library
Access	ifnm-access-pts	shape		
Main regional access routes	ironwoodtrn	shape		
Withdrawal Area Boundaries				
State/Federal Exchange				
State/Private Exchange				
Route Inventory				
City Parks				
County Parks				
Monuments				
Realty Management Locations				
Land Tenure				
Land Tenure Joint Management Areas				
Undocumented Immigrant Routes				
<b>Air Quality</b>				
Class 1				
PM-10 Non-attainment Areas - Pima/Pinal Counties				
<b>Cultural Resources</b>				
AZSITE				
Historic Structures				
Historic Trails				
Cult. features identified during the travel route inventory	cultural_lst	shape		
<b>Energy &amp; Minerals</b>				
Subsurface Mineral Ownership				
Subsurface Estate				
Renewable Energy Resources (wind, solar)			NREL	<a href="http://www.nrel.gov/gis/index_of_maps.html">http://www.nrel.gov/gis/index_of_maps.html</a>
Mineral Districts	mineraldistrict_utm12	shape		
Mining Activities	minerals-merge	shape		Mining related features from UA route inventory
Lithology				
Mineral Production Facilities				
Abandoned Mine Lands				
Mining Claims	ifnmclaims	shape		
Oil & Gas Leases				
Coal Leases				
Physiographic Sections				

Table 4-1 – GIS Data Inventory

Data Description	Coverage Name	Format	Data Source (if not BLM)	Notes, Contacts, Collection Method
Oil & Gas and Coal Fields				
Mineral Occurrences				
Mineral Resource Potential (Coal, Coal bed Methane, O&G)				
Past, Present, Project Mineral Development				
Saleable and Locatable Minerals (sand, gravel, decorative rock)				
<b>Environmental Justice</b>				
Census Data Summary Tape 1 (1990 & 2000)				URS Data Library
Census Data Summary Tape 3 (1990 & 2000)				URS Data Library
<b>Geology</b>				
Geology			AGS	URS Data Library (AGS Map 35, Richard, et. all 2002)
Tectonic Index Map				
Fault Lines				
Caves				
Paleontological Resources				
<b>Hazardous Materials</b>				
Active/Closed Landfills				
Non-point Source				
Superfund Sites				
UST Sites				
LUST Sites				
CERCLA Sites				
RCRA Sites				
Trash, Waste or Junk Dump sites	trashdum-merge	shape		
<b>Land Use</b>				
Existing Land Use (points, lines, polygons)				
Proposed Land Use (points, lines, polygons)				
<b>Range Resources</b>				
Allotment Boundaries	grazallot	shape		
Range Improvements	fences_ifnm:gate-merge	shape		
Range Facilities	rangefac0lst	shape		salt licks-corrals-water
Wild Horse/Burro Management Areas				
Cattleguards	cattlegu-merge	shape		
livestock waters	rangewaterbuf402	shape		
<b>Recreation</b>				
Recreational Sites (geocaching, gold panning, rockhounding, climbing, etc.)	reccitelst	shape		UA Recreation study
Backpacking Areas				
Horseback Riding Areas				
Mountain Bike Use Areas				
Target Shooting Areas				
Hiking Trails				
Recreation & Public Purpose Act lands				
Visitor Facilities				
Recreation Opportunity Spectrum Classes				
OHV Trails/Areas	ifnmohv	shape		
Drainages with OHV use	wash_orv	shape		
OHV Drainage Access from existing roads	washrun_ifnm:washrun110702	shape		
Areas of unauthorized/unregulated OHV Use				
Historic Trails				
ERMAs				
SRMAs				
Seasonal RV Camping Areas				
Traffic counter locatons	counters	shape		

Table 4-1 – GIS Data Inventory

Data Description	Coverage Name	Format	Data Source (if not BLM)	Notes, Contacts, Collection Method
travel routes	ifnmtrnbdylst	shape		Preliminary from UA data
travel routes	ifnmrout27bdy	shape		linear disturbance features from photointerp. of 1996 aerials
travel routes	ifnmrout27	shape		same as above, outside ifnm
travel inventory merged GPS	itrm-merge	shape		Preliminary from UA data
Signs	sign-merge	shape		
<b>Special Management Areas</b>				
ACEC's	watermanacec	shape		URS Data Library
Nominated ACEC's				
Wilderness Boundaries	wildblm;wildfs;wildfws;wildnps	shape		URS Data Library
Research National Areas				
Wilderness Characteristics (BLM or Citizen proposals)				
<b>Soils</b>				
Soils				
Prime and Unique Farmlands				
Erosive and Fragile Soils				
Erosion problems along roads	erosions-merge	shape		
<b>Transportation</b>				
Interstates	azclass1rds	shape		URS Data Library
Major Roads	azclass2rds	shape		URS Data Library
Secondary Roads	Class345rdsse	shape		
Light Duty Roads	Class345rdsse	shape		
4-Wheel Drive Roads	Class345rdsse	shape		
Railroads				URS Data Library
Scenic Byways				
Closed Roads				
Road Barriers/Obstructions	barrier-merge	shape		
Potential safety hazards along roads	hazardsi-merge	shape		
<b>Utilities</b>				
Right-of-Way				
Right-of-Way Avoidance Areas				
Communication Sites	ifnm-commsite	shape		
Pipelines	pipeline	shape		URS Data Library
Electric Transmission Lines	powerline	shape		URS Data Library
Utility Corridors (proposed)	powerlinep	shape		
Wind Powered Generation Sites				
Utility Withdrawals				
<b>Vegetation</b>				
Vegetation	gapveg_ifnm	shape		
Standard Habitat Sites				
Wetlands				
Riparian				URS Data Library (SDCP Inventory)
Noxious weeds/non-native plants				
Ecological Study Plots				
Rare Plants				
Vegetation Trend				
Vegetation Condition	vegetati-merge	shape		Vegetation Condition along UA travel routes
Vegetation Treatment				
<b>Visual Resources</b>				
Scenic Quality				
Landscape Character				
Sensitive Viewpoints				
Distance Zones				
VRM's				

Table 4-1 – GIS Data Inventory

Data Description	Coverage Name	Format	Data Source (if not BLM)	Notes, Contacts, Collection Method
<b>Surface Water Resources</b>				
Annual Precipitation				<a href="http://www.climate-source.com/">http://www.climate-source.com/</a>
Watershed Basins				URS Data Library (8 digit HUC Code)
Streams/Lakes/Playas	hydroper_lse;hydroint_lse	shape		URS Data Library
Waters of the US				
FEMA Floodplains				
Wells (Base Waters;springs, wells, tanks)	ifnmwellreg;waterfac-merge	shape		ADWR 2000; dams, tanks, wells, trough from UA Route Inventory
Wellhead Protection Areas				
ADEQ Category 1 Watersheds				
Road/Drainage Crossings	drainage-merge	shape		
<b>Groundwater Resources</b>				
Aquifers				
Underground Water Basins "TEC"				
Declared Underground Water Basins				
<b>Wildlife Resources</b>				
Wildlife Migration Corridors				
Habitat Management Plan Boundaries				
AGFD Hunt Units	azgmu	shape		URS Data Library
Desert Tortoise Habitat Areas	torthab	shape		URS Data Library (2003 BLM Transfer)
Habitat Areas (individual species)				
Wildlife Reintroduction Areas				
Species Distributions (T&E, AZ Sp. of Concern, BLM Sens. Sp.)				
T&E Reintroduction Areas				
Inland Native Fish/Anadromous Fish				
Critical Habitat			USFWS	URS Data Library
Proposed Critical Habitat				
Proposed Recovery Habitat				
Willow-Flycatcher Areas				
Big Horn Sheep Wildlife Management Areas	sibishwma	shape		
Wildlife Waters	guzzler	shape		
Cactus Ferruginous Pygmy-owl Critical Habitat	cfpo	shape		
Wildlife related features	wildlife-merge	shape		from UA route inventory
<b>Special Project Areas</b>				
Available Lands DOI/Governor Agreement				
Cross-border Issue Areas with Mexico				
<b>Timber/Fire Resources</b>				
Wildfire History				
Fuel Loading Areas				
Fuel Reduction Areas				
Prescribed Burn Areas/Boundaries				
Urban Interface Risk Areas				
Fire Management Plan Boundary				

## SECTION 5 – SUMMARY OF FUTURE STEPS

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### 5.1 Planning Process

BLM's planning process employs nine basic steps, which are listed below and described in the planning regulations (Manual 1617, Section 42):

- Identification of issues
- Development of planning criteria
- Data and information collection
- Management situation analysis
- Formulation of alternatives
- Estimation of effects of the alternatives
- Selection of the preferred alternative(s)
- Selection of the plan
- Monitoring and evaluation

The process requires the use of an interdisciplinary team of resource specialists to complete each step. An important part of the BLM's planning process is to develop an RMP that will have community and political support. To achieve this, BLM is committed to continuing to engage the public and relevant agencies in a planning process. Land use planning often provides the catalyst for bringing communities, agencies, other groups, and individuals together to reach mutually beneficial goals. Over the past few years, BLM has incorporated collaborative approaches to planning and land stewardship projects. A collaborative approach to planning entails BLM working together with tribal, state, and local governments; other federal agencies; and interested organizations and individuals, from the earliest stages of, throughout, and beyond the planning process to address common needs and goals within the planning area. Collaboration increases community involvement with and support for management decisions and implementation – it establishes a long-term commitment by the participants for a shared responsibility and stewardship for the land.

#### 5.1.1 Identification of Issues

Issues were identified through the scoping process, which initiated the planning process. The scoping process and the issues identified are documented in this Scoping Report.

#### 5.1.2 Development of Planning Criteria

Planning criteria establish constraints and guidelines for the planning process; establish standards, rules, and measures; set the scope of inventory and data collection; help identify the range of alternatives; and estimate the extent of analysis. Based on the issues identified and on BLM management concerns, BLM drafted the planning criteria as described in Section 2.0 of this document.

#### 5.1.3 Data and Information Collection

As explained in Section 4.0, much of the data and information will be extracted and used from existing data on file at BLM TFO, BLM Arizona State Office, or through other local agencies and academic institutions. Other data and information will be obtained from current studies being conducted by BLM and through relevant sources to update and/or supplement BLM's data. Data include published and

unpublished reports, maps, and digital format for use in a GIS. Generally, the resources and resource uses to be addressed include the following:

- Land (tenure) and real estate
- Geology
- Soils
- Water resources
- Air quality
- Vegetation
- Wildlife
- Special status species
- Grazing management
- Noxious weeds
- Cultural resources
- Paleontological resources
- Recreation
- Visual resources
- Special management areas
- Social and economic conditions
- Fire management
- Public health and safety

During the data and information collection step of the process, BLM will initiate specific coordination with agencies, including the USFWS for Section 7 consultation and SHPO for Section 106 consultation, to ensure these processes are completed in conjunction with the RMP process.

#### **5.1.4 Management Situation Analysis**

The purpose of the Management Situation Analysis is to conduct a deliberate assessment of the current situation in the planning area. The documentation is a compilation of information appropriate to and commensurate with the planning issues. The Management Situation Analysis provides a profile of the existing condition of the environment, description of the existing management (e.g., laws, regulations, policies, management direction), and analysis of opportunities to continue or modify the existing management situation.

#### **5.1.5 Formulation of Alternatives**

BLM, in collaboration with relevant agencies and the public, will develop a range of reasonable alternatives (i.e., combinations of management strategies) to the existing management situation that address the issues identified during scoping, comply with BLM's planning regulations and policies, comply with the FLPMA requirement of managing for sustained yield and multiple use, and comply with other laws and regulations. Also, an alternative for no action will be addressed. The no-action alternative assumes that existing management will continue.

This is the most prominent milestone task for collaboration and public participation. Because the development of alternatives is a critical step for which careful and thorough collaborative planning is needed, several public workshops will be scheduled to discuss the alternatives for the planning area. The meetings will be informal, open house meetings with the public, interested organizations, and agencies. Following approval of the alternatives by the BLM Arizona State Director, additional public meetings will be held to present and explain the alternatives to the public.

### **5.1.6 Estimation of Effects of the Alternatives**

BLM then will assess the potential effects of the RMP alternatives.

### **5.1.7 Selection of the Preferred Alternative**

Based on the information generated in the previous step, the Tucson Field Manager will identify and recommend a preferred alternative to the BLM Arizona State Director. The Draft RMP/EIS will be prepared and distributed to the public for review and comment for a period of 90 days. Public meetings will be scheduled during the comment period. The availability of the Draft RMP/EIS and public meetings will be announced via *Federal Register*, media, planning bulletin, and on the website.

### **5.1.8 Selection of the Plan**

Based on the results and thorough consideration of the public and agency comments on the Draft RMP/EIS, the Tucson Field Manager will recommend to the BLM Arizona State Director the Proposed RMP and publish the RMP along with the Final EIS. A final decision will be made after a 60-day Governor's Consistency Review and simultaneous 30-day protest period. The Record of Decision and approved RMP then will be published. The availability of the Proposed RMP/Final EIS will be announced via *Federal Register*, media, planning bulletin, and on the website.

### **5.1.9 Monitoring and Evaluation**

Over time, BLM will monitor and evaluate actions, resource conditions, and trends to determine the effectiveness of the RMP and to ensure that implementation of the RMP is achieving the desired results. The RMP will be kept current through minor maintenance, amendments, or revisions as demands on resources change, as the resources change, or as new information is acquired.

## SECTION 6 – REFERENCES

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U.S. Department of the Interior, BLM. 2003. Arizona Statewide Land Use Plan Amendment for Fire, Fuels, and Air Quality Management Environmental Assessment. AZ State Office. September.

\_\_\_\_\_. 2002. Land Use Planning Handbook. BLM Handbook H-1601-1. August 22 release.

## **APPENDIX A**

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Presidential Proclamation 7320

Monday, June 12, 2000

Volume 36, Issue 23; ISSN: 0511-4187

Proclamation 7320--Establishment of the Ironwood Forest National  
Monument  
William J Clinton

June 9, 2000

By the President of the United States of America

A Proclamation

The landscape of the Ironwood Forest National Monument is swathed with the rich, drought-adapted vegetation of the Sonoran Desert. 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. Ragged Top Mountain is a biological and geological crown jewel amid the depositional plains in the monument.

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. Ironwoods, which can live in excess of 800 years, generate a chain of influences on associated understory plants, affecting their dispersal, germination, establishment, and rates of growth. Ironwood is the dominant nurse plant in this region, and the Silver Bell Mountains support the highest density of ironwood trees recorded in the Sonoran Desert. Ironwood trees provide, among other things, roosting sites for hawks and owls, forage for desert bighorn sheep, protection for saguaro against freezing, burrows for tortoises, flowers for native bees, dense canopy for nesting of white-winged doves and other birds, and protection against sunburn for night blooming cereus.

The ironwood-bursage habitat in the Silver Bell Mountains is associated with more than 674 species, including 64 mammalian and 57 bird species. Within the Sonoran Desert, Ragged Top Mountain contains the greatest richness of species. The monument is home to species federally listed as threatened or endangered, including the Nichols 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.

In addition to the biological and geological resources, the area holds abundant rock art sites and other archeological objects of scientific interest. Humans have inhabited the area for more than 5,000 years. More than 200 sites from the prehistoric Hohokam period (600 A.D. to 1450 A.D.) have been recorded in the area. Two areas within the monument have been listed on the National Register of Historic Places, the Los Robles Archeological District and the Cocoraque Butte Archeological District. The archeological artifacts

include rhyolite and brown chert chipped stone, plain and decorated ceramics, and worked shell from the Gulf of California. The area also contains the remnants of the Mission Santa Ana, the last mission constructed in Pimeria Alta.

Section 2 of the Act of June 8, 1906 (34 Stat. 225, 16 U.S.C. 431), authorizes the President, 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 to 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.

Whereas it appears that it would be in the public interest to reserve such lands as a national monument to be known as the Ironwood Forest National Monument:

Now, Therefore, I, William J. Clinton, President of the United States of America, by the authority vested in me by section 2 of the Act of June 8, 1906 (34 Stat. 225, 16 U.S.C. 431), do proclaim that there are hereby set apart and reserved as the Ironwood Forest National Monument, for the purpose of protecting the objects identified above, all lands and interests in lands owned or controlled by the United States within the boundaries of the area described on the map entitled "Ironwood Forest National Monument" attached to and forming a part of this proclamation. The Federal land and interests in land reserved consist of approximately 128,917 acres, which is the smallest area compatible with the proper care and management of the objects to be protected.

All Federal lands and interests in lands within the boundaries of this monument are hereby appropriated and withdrawn from all forms of entry, location, selection, sale, or leasing or other disposition under the public land laws, including but not limited to withdrawal from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposes of the monument.

For the purpose of protecting the objects identified above, the Secretary of the Interior shall prohibit all motorized and mechanized vehicle use off road, except for emergency or authorized administrative purposes.

Lands and interests in lands within the proposed monument not owned by the United States shall be reserved as a part of the monument upon acquisition of title thereto by the United States.

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 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 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.

This proclamation does not reserve water as a matter of Federal law. Nothing in this reservation shall be construed as a relinquishment or reduction of any water use or rights reserved or appropriated by the United States on or before the date of this proclamation. The Bureau of Land Management shall work with appropriate State authorities to ensure that any water resources needed for monument purposes are available.

Nothing in this proclamation shall be deemed to enlarge or diminish the rights of any Indian tribe.

Laws, regulations, and policies followed by the Bureau of Land Management in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the monument.

Nothing in this proclamation shall be deemed to revoke any existing withdrawal, reservation, or appropriation; however, the national monument shall be the dominant reservation.

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.

In Witness Whereof, I have hereunto set my hand this ninth day of June, in the year of our Lord two thousand, and of the Independence of the United States of America the two hundred and twenty-fourth.

William J. Clinton

[Filed with the Office of the Federal Register, 10:47 a.m., June 12, 2000]

NOTE: This proclamation will be published in the Federal Register on June 13.