



TOHONO O'ODHAM NATION  
OFFICE OF THE  
CHAIRMAN AND VICE CHAIRMAN

EDWARD D. MANUEL  
CHAIRMAN

VERLON M. JOSE  
VICE CHAIRMAN

O'ODHAM HA-WE:HEJED

*"For the People"*



July 10, 2017

The Honorable Ryan Zinke, Secretary  
Monument Review, MS-1530  
U.S. Department of the Interior  
United States Department of the Interior  
1849 C Street NW  
Washington, D.C. 20240

Re: Comments Regarding Review of National Monuments under Executive Order 13792

Dear Secretary Zinke,

As Chairman of the Tohono O'odham Nation, I am writing to provide comment regarding the review of national monuments under Executive Order (EO) 13792. I fully support the current designated national monuments in Arizona, and oppose any attempt to diminish their boundaries.

This EO directs the review of at least twenty and as many as forty national monuments, which all tribal nations recognize are of critical importance. Two of these national monuments, Ironwood Forest National Monument and Sonoran Desert National Monument, are lands that O'odham people have lived in, thrived in, and found sacred since time immemorial. These monuments protect parts of our historical homeland and they celebrate and share our deep history on this landscape and our very existence in concert with the desert.

In making your assessment, you were directed to consider seven factors. 82 Fed. Reg. 20429-20430 (May 1, 2017). Both Sonoran Desert National Monument and Ironwood Forest National Monument are appropriately classified under the Antiquities Act based on an analysis under those factors.

Sonoran Desert National Monument contains significant archeological and historic sites, including rock art sites, lithic quarries, and scattered artifacts. Large villages occur throughout the monument and Vekol Wash was an important trade corridor for our ancestors. In addition, the Bureau of Land Management has designated approximately 25,000 acres of land in the Maricopa Mountains as critical habitat for the desert tortoise. The desert tortoise is an important species to the Tohono O'odham.

Ironwood Forest National Monument also contains significant archeological and historic sites, including numerous rock art sites. More than 200 sites have been recorded in area from our ancestors, including two area listed on the National Register of Historic Places – the Los Robles Archeological District and the Cocoraque Butte Archeological District. In addition, the monument contains the remnants of the Mission Santa Ana, the last mission constructed in Pimeria Alta.

In accordance with the factors set out in this EO, both monuments' boundaries are limited to the smallest area compatible with the proper care and managements of the cultural and ecological resources being protected; are appropriately classified under the Antiquities Act as "historic landmarks, historic and prehistoric structures, [or] other objects of historic or scientific interest"; are consistent with the multiple-use policy of the Federal Land Policy and Management Act; and support the use and enjoyment of the Tohono O'odham Nation, which is adjacent to the monuments. Finally, the Tohono O'odham Nation, a federally recognized tribe, would be concerned if these lands were not managed as monuments.

In addition to the importance these national monuments have to the Tohono O'odham Nation, it should be noted that they also play a significant role in the state and regional economy. Research has shown that conservation of public lands benefits surrounding communities by attracting tourism and improving quality-of-life for residents. Arizona would quite literally be a poorer place without these protected lands.

As a result, on behalf on the Tohono O'odham Nation, I support the continued designation of these lands as national monuments. Like other tribes across the United States, the Nation also urges you to take more steps to preserve our quickly dwindling natural treasures.

Sincerely,

A handwritten signature in black ink, reading "Edward D. Manuel". The signature is written in a cursive style with a large, prominent "E" and "M".

Edward D. Manuel

Chairman of the Tohono O'odham Nation