



## PIMA COUNTY BOARD OF SUPERVISORS

### DISTRICT 3

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**SHARON BRONSON**  
CHAIR

July 10, 2017

The Honorable Ryan Zinke, Secretary  
United States Department of the Interior  
1849 C Street NW  
Washington, DC 20240

**Re: Congressional Western Caucus Letter of June 30, 2017 Regarding Review of National Monuments under Executive Order 13792**

Dear Secretary Zinke:

I write to you as the Chair of the Pima County Board of Supervisors to respond to the June 30, 2017 letter from the Congressional Western Caucus and to express my dismay at their comments and recommendations.

On May 16, 2017, the Pima County Board of Supervisors adopted Resolution 2017-33, *"Resolution of the Pima County Board of Supervisors Recognizing the Importance of the 1906 Antiquities Act and Supporting the Ironwood Forest National Monument Designation in Pima County Consistent with the Sonoran Desert Conservation Plan."* We filed this Resolution in Docket ID: DOI-2017-0002-0001 at regulations.gov.

I am frankly astounded that the Congressional Western Caucus (CWC), including three Arizona Congressional members, recommended elimination of all four Arizona National Monuments subject to E.O. 13792 – Ironwood Forest, Sonoran Desert, Grand Canyon-Parashant, and Vermilion Cliffs.

Not only did the CWC disregard the broad support for these monuments from their constituents, not one Arizona representative on the CWC contacted me as Chair of the Pima County Board of Supervisors regarding the importance and benefits the Ironwood Forest National Monument and all Arizona monuments have to our community and to the Tohono O'dham Nation and Pascua Yaqui Tribe. Nor did they inquire as to what impacts to our local economy or environment would result if these monuments were eliminated. Instead, their lack of contact demonstrates they have no regard or respect for the broad interests of their constituents whom these elected officials are supposed to represent.

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Not only do these monuments preserve sacred and ancestral sites of Native peoples and habitat for endangered species and game species, the Ironwood Forest National Monument (IFNM) and others continue as working landscapes and provide enormous economic benefits to Arizona from outdoor recreation and tourism.

In fact, the CWC seems to have little understanding of, or interest in, how these monuments are actually managed on the ground or what activities are allowed on monument lands. Intentionally or otherwise, the CWC asserts several outright falsehoods in its justification for rescinding the IFNM, relying on incorrect information regarding its management, which frankly calls into question all of the recommendations made in this poorly researched letter.

For example, the CWC letter states that, *"This monument [IFNM] prevents multiple-use on State Trust lands and has subsequently caused harm to the common schools beneficiary, K-12 education."* However, as the Arizona representatives are surely aware, State Trust lands are not managed with any type of multiuse mandate, as the CWC statement clearly implies. In fact, Arizona state lands are not even considered public lands. According to the Arizona State Land Department (ASLD) itself: *"Arizona State Trust lands are not 'public lands' ... Federal 'public lands' are managed for the benefit and use of the public, while State Trust lands are managed for the benefit of 13 Trust beneficiaries..."*<sup>1</sup> Any public use of State Trust lands, whether or not within a national monument designation, requires a permit from the ASLD. In spite of what the CWC claims, the IFNM designation did not make any changes to how State Trust Lands can be used within the monument's boundaries.

The CWC is also deeply misleading when it states, *"The [IFNM] monument proclamation explicitly prohibited...OHV use"* on monument lands. This is simply not true. The proclamation states that the Interior Secretary *"shall prohibit all motorized and mechanized vehicle use off-road."* However, Off-highway Vehicle (OHV) use is not prohibited anywhere in the monument designation or in its Resource Management Plan or Travel Management Plan. In fact, OHVs are explicitly allowed on monument lands; they are simply required to stay on designated roads and trails. It is worth noting that this restriction on off-road travel also applies to OHV use on all Arizona State lands,<sup>2</sup> including those lands within monument boundaries, as well as most other federal lands in southern Arizona, because of the severe damage taking vehicles off-road can inflict on natural and cultural resources in this arid region.

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<sup>1</sup> Arizona State Land Department website. General FAQ. <https://land.az.gov/faq/general-faq>. Accessed July 7, 2017.

<sup>2</sup> Arizona State Land Department website. Off-Highway Vehicle FAZ. <https://land.az.gov/faq/highway-vehicle-faq>. Accessed July 7, 2017.

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The CWC letter also vaguely implies ranchers have concerns regarding access; however, ranching continues on the IFNM since its designation, and ranchers have had significant input on the IFNM Travel Management Plan (TMP), specifically as it relates to access. According to the 2014 TMP, *“Livestock grazing is permitted on Monument lands under 11 leases that are entirely or partly within the proclaimed boundary ... Lease operators provided information during the development of the proposed TMP on their administrative access needs related to grazing operations. This information was used to determine the number, type and width of gates needed for administrative access, and identify roads in poor condition.”*

In addition to having no meaningful understanding of how these monuments are managed, I am also appalled that the CWC Arizona representatives have so little knowledge of the geography of the state they represent and the actual locations of these monuments. The CWC letter notes that the Sonoran Desert National Monument is located in *“southeastern Arizona... in “proximity to our nation’s southern border...”* The letter makes further note that *“the Sonoran Desert National Monument’s proximity to the U.S.-Mexico border presents a unique challenge as it pertains to land management,”* and that *“this designation jeopardizes national security.”* The letter goes on to imply the Monument is actually adjacent to the international border, citing statistics regarding the percentage of federally owned lands that *“abut”* the U.S.-Mexico border, clearly leading the reader to believe the Sonoran Desert National Monument belongs in this category of lands on the international border.

I would like to correct the CWC and Arizona Congressmen, as well as the official record. The Sonoran Desert National Monument is not located in southeastern Arizona, and it does not in any way *“abut”* the border, as the CWC misleading statements imply. In fact, the monument is located in central Arizona west of Phoenix, over 100 miles north of the U.S.-Mexico border. Unless the CWC also wants to cede the Gadsden Purchase back to Mexico, this clear error is seemingly designed to mislead the public about this monument designation and undermine its broad and unwavering support in the local community.

Contrary to the CWC assertion that the monument jeopardizes national security, I would argue the Sonoran Desert Monument benefits national security and military training because it abuts and buffers the Barry Goldwater Air Force Bombing Range. If the CWC were actually concerned about national security, they would consider how the elimination of this monument would affect US Air Force training.

To conclude, I find the claims in the CWC letter disingenuous and lacking in any local constituent input. As stated in Resolution 2017-33, Pima County supports retaining the full text and authorities of the 1906 Antiquities Act as one of the nation’s most important conservation laws to safeguard and preserve public lands. As Chair of the Pima County Board of Supervisors, I strongly affirm Pima County’s continued support for the designation

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of the Ironwood Forest National Monument and all other designated National Monuments in Arizona.

Sincerely,



Sharon Bronson, Chair  
Pima County Board of Supervisors

SB/mk

Attached: Pima County Resolution 2017-33

c: Senator John McCain (AZ)  
Senator Jeff Flake (AZ)  
Representative Tom O'Halleran (AZ-1)  
Representative Martha McSally (AZ-2)  
Representative Raúl Grijalva (AZ-3)  
Representative Paul Gosar (AZ-4)  
Representative Andy Biggs (AZ-5)  
Representative David Schweikert (AZ-6)  
Representative Ruben Gallego (AZ-7)  
Representative Trent Franks (AZ-8)  
Representative Kyrsten Sinema (AZ-9)  
Edward Manuel, Chairman, Tohono O'odham Nation  
Robert Valencia, Chairman, Pascua Yaqui Tribe  
Verlon Jose, Vice Chairman, Tohono O'odham Nation  
Peter Yucupicio, Vice Chairman, Pascua Yaqui Tribe  
Chuck Huckelberry, Pima County Administrator  
Thomas Weaver, Chief Civil Deputy Pima County Attorney  
Lesley Lukach, Deputy Pima County Attorney

RESOLUTION 2017 - 33

**RESOLUTION OF THE PIMA COUNTY BOARD OF SUPERVISORS  
RECOGNIZING THE IMPORTANCE OF THE 1906 ANTIQUITIES ACT  
AND SUPPORTING THE IRONWOOD FOREST NATIONAL MONUMENT  
DESIGNATION IN PIMA COUNTY CONSISTENT WITH THE SONORAN  
DESERT CONSERVATION PLAN**

**The Board of Supervisors of Pima County, Arizona finds:**

1. Since 1872, the United States National Park System has grown from a single, public reservation now called Yellowstone National Park to embrace over 450 natural, historical, recreational, memorial, and cultural areas throughout the United States under the control and protection of the Secretary of the Interior.
2. The Antiquities Act of 1906, (P.L. 59-209, formerly 16 U.S.C. §§ 431-433, now 54 U.S.C. §§ 320301-320303), the cornerstone of our nation's cultural heritage protection laws, was passed by the United States Congress and signed into law by President Theodore Roosevelt on June 8, 1906.
3. Section 2 of the Antiquities Act gives the President the authority to set aside for protection "...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."
4. In 1998, the Pima County Board of Supervisors entered into Resolution 1998-250 with the Secretary of Interior to support the Endangered Species Act and to work with the Department of Interior to develop the Sonoran Desert Conservation Plan.
5. In 1999, the Board of Supervisors adopted the Sonoran Desert Conservation Plan that encompasses five conservation elements – riparian areas, habitat protection, mountain parks, ranch conservation, and cultural and historic site preservation.
6. In 2000, scientific findings concluded that the Ragged Top Mountain and Cocoraque Butte areas had the highest levels of species richness due to the Ironwood tree forest in the study area, as well as numerous cultural resource sites, and that these areas should be identified as priorities for new protection and for strengthened conservation management.
7. In 2000, the Pima County Board of Supervisors passed Resolution 2000-63, witnessed by the Secretary of Interior, to pursue the establishment of a Ragged Top and Silverbell Mountains Ironwood Preserve "up to and including a National Monument designation...."

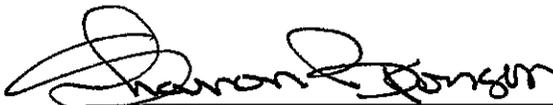
8. On June 9, 2000, President William J. Clinton signed a Proclamation declaring the establishment of the Ironwood Forest National Monument in on public lands in Pima and Pinal counties to be managed by the Bureau of Land Management.
9. There are currently 22 National Parks, National Monuments, Historic Sites, Trails and Memorials managed by the National Park Service in Arizona, and five National Monuments that are managed by the Bureau of Land Management.
10. On April 26, 2017, President Trump signed Executive Order 13792 instructing the Department of Interior to review 27 national monuments designated under the 1906 Antiquities Act. The order specifically instructs the Department of Interior to review monuments over 100,000 acres and designated since 1996, to decide whether these should be retained, eliminated or reduced in size. Public comment will be taken after May 12, 2017, for a period of 60 days.
11. Four out of the five National Monuments in Arizona managed by the Bureau of Land Management are under review, including Ironwood Forest, Sonoran Desert, Grand Canyon-Parashant, and Vermilion Cliffs National Monuments.
12. These four Arizona National Monuments conserve a great diversity of natural and cultural resources, protect magnificent landscapes, preserve countless archaeological sites considered sacred by Arizona tribal nations, provide habitat for endangered species and game species, provide public access and enjoyment of some of the Nation's best remaining wildlands, and ultimately provide enormous economic benefits to the state of Arizona from outdoor recreation and tourism.
13. The economic benefits to the Mountain West states, especially in rural areas including Arizona, from outdoor recreation on public lands resulted annually in direct spending of \$104.5 billion; 925,000 jobs; federal tax revenues of \$7.7 billion; and state and local tax revenues of \$7.2 billion, according to the Outdoor Recreation Association Economic Benefits Report 2017.
14. In Pima County in 2015, travel and tourism accounted for \$2.24 billion in direct spending; 24,060 jobs, \$115.4 million in state tax revenue, and \$81.9 million in local tax receipts, and because of tourism and visitor spending, each Pima County household had their tax burden reduced by \$490, according to Visit Tucson Economic Impact of Travel and Tourism Report 2017.
15. Should the Ironwood Forest National Monument be eliminated or reduced in size, Pima County could expect less tourism based on outdoor recreation, fewer visitors, diminished economic benefits, and less in state and local tax receipts and benefits to the local economy.
16. Should the Ironwood Forest National Monument be eliminated or reduced in size, Pima County will experience the loss of protections for the Monument's natural

resources and cultural and historic sites that would lessen the effectiveness of landscape level protections and objectives of the Sonoran Desert Conservation Plan.

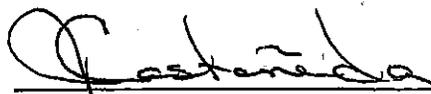
NOW, THEREFORE, BE IT RESOLVED that the Pima County Board of Supervisors:

1. Supports retaining the full text and authorities of the 1906 Antiquities Act, signed by President Roosevelt, as one of the nation's most important conservation laws to safeguard and preserve public lands, natural wonders, and cultural and historic sites for all Americans to enjoy.
2. Reaffirms its support for the designation of the Ironwood Forest National Monument consistent with the findings and objectives of the Sonoran Desert Conservation Plan.
3. Concludes that the Ironwood Forest National Monument and all designated National Monuments deserve to be safeguarded and retained as proclaimed under the 1906 Antiquities Act.
4. Finds that numerous values, including enormous economic benefits, accrue from the designation and protection of National Monuments throughout the United States, and that their value to the American people should not be questioned or threatened with diminished protections.
5. Authorizes and directs the County Administrator and appropriate staff to effect this resolution and urge the United States of America through the Secretary of Interior and Arizona's Congressional delegation to retain the full text and authorities of the 1906 Antiquities Act and to retain the full designation and protections of the Ironwood Forest National Monument.

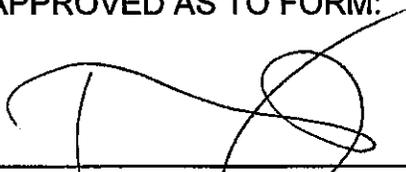
Passed, adopted and approved, this 16 day of May, 2017.

 MAY 16 2017  
Sharon Bronson, Chair, Pima County Board of Supervisors

ATTEST:

  
Julie Castañeda, Clerk of the Board

APPROVED AS TO FORM:

  
Thomas Weaver, County Attorney