



October 2, 2025

Clairisse Loucks
NEPA Planner and District Environmental Coordinator
Kaibab National Forest
Williams Ranger District
742 South Clover Road
Williams, AZ 86046

Subject: Rain Tank Grazing Reauthorization Project

Submitted Electronically to: objections-southwestern-kaibab-tusayan@usda.gov.

These comments and concerns to the Final Environmental Assessment (EA) and Draft Decision Notice and Finding of No Significant Impact (FONSI) for the Rain Tank Allotment Grazing Reauthorization Project dated September 2025, are submitted by Great Old Broads for Wilderness (Broads) and the Yavapai Group Sierra Club Grand Canyon Chapter (Sierra Club) acting as partners to protect our public lands.

Great Old Broads for Wilderness is a national non-profit grassroots organization established in 1989. We are advocates, stewards, and educators for the preservation and protection of wilderness and wildlands. Broads, through Broadbands across the country, work with agencies in stewardship and monitoring of public lands. Our primary focus is to preserve and protect wilderness and wild public lands. Wild places, once destroyed, may be gone forever.

The Sierra Club, founded in 1892, is a national nonprofit organization of approximately 2.7 million members and supporters dedicated to exploring, enjoying, and protecting the wild

places of the earth; to practicing and promoting the responsible use of the earth's ecosystems and resources; to educating and enlisting humanity to protect and restore the quality of the natural and human environment; and to using all lawful means to carry out these objectives. Sierra Club's Grand Canyon Chapter was organized in 1965, and, prior to that, our members were also involved in protecting Arizona's resources. We have a significant interest in protecting and restoring water quality in Arizona's rivers, lakes, and streams. We are also concerned with protecting the health of the forest and wildlife. It is within that context that we are submitting these comments. Sierra Club – Yavapai Group 202has a long-standing interest in Prescott National Forest. We have participated in the forest planning process. Our members have long enjoyed the forest for hiking, trail riding, hunting, fishing, wildlife watching, and solitude. We conduct service projects in the forest and our members and volunteers are deeply concerned for the future well-being of our forests.

Broads and Sierra Club reiterate our comments submitted in response to the Draft Environmental Assessment dated June 13, 2025.

Permitted Animal Unity Months (AUMs)

We believe that livestock grazing on public lands

- 1. Degrades landscapes and causes deforestation.*
- 2. Threatens native species.*
- 3. Degrades water quality and quantity.*
- 4. Destroys riparian habitat and tramples banks and springs.*
- 5. The leading source of greenhouse gas emissions.*
- 6. Spreads invasive weeds.*
- 7. Skews natural fire regimes.*
- 8. Accelerates soil erosion, damaging riparian and upland ecosystems and forests.*
- 9. Destroys biological soil.*
- 10. Leads to the killing of wildlife such as wolves, prairie dogs, grasshoppers, and beavers in favor of cows.*
- 11. Forage consumed by domestic livestock is not available for native wildlife.*
- 12. Detracts from the wilderness experience of camping, hiking, picnicking, swimming, wildlife viewing, and other uses.*
- 13. Accelerates Climate change. Loss of vegetation combined with increased bare soil has led to loss in carbon and nitrogen storage leading to a rise in temperatures which threaten the ecosystems over the longer term.*

Purpose

Your draft proposed action states: "The purpose of this project is to determine whether to continue to authorize livestock grazing on the Rain Tank Allotment. Additionally, this project would assist in determining how to implement grazing while ensuring livestock

management activities are consistent with the protection of resources within the Monument and other resource desired conditions on NFS lands as stated in the Forest Plan (2014).” You go on to say that “There is a need to adjust the range in AUMs of permitted livestock and rotation strategies to allow for increased flexibility for livestock management on the allotment in a manner that provides for resource protection.”

Currently there are 280 cow/calf pairs for a period of seven months (1,970 AUMs). How would increasing the number of AUMs to as many as 3,500) allow for “increased flexibility for livestock management on the allotment in a manner that provides for resource protection.”? Is there a significant economic benefit to the American taxpayer by increasing the number of cows? Obviously, increasing the number of cows increases the danger from the reasons we list above.

Your draft EA proposes increasing the number of AUMs and along with that a new adaptive management plan. You state: “Change from the currently permitted 1,970 AUMs to a range in permitted AUMs to add flexibility on an annual basis based on resource conditions, such as precipitation, vegetative growth and other rangeland condition indicators determined by monitoring.” Obviously, you are increasing grazing numbers because you believe there are resources to support the increase in cows. On June 7, 2025, Broads drove the roads through the Rain Tank pastures and found minimum amounts of grass.

For you to achieve your objectives, the number of AUMs must be reduced, not increased. We suggest removing as many cows from our wildlands as possible and onto private land where it is available to avoid this environmental damage. The American taxpayers are paying for the devastation of the environment with grazing subsidies and the addition of water diversions and buildings

Sustainability and the Future

Sustainability is the ability to maintain processes or states over time, ensuring resource availability for future generations.

The Forest Plan (USDA Forest Service 2014) provides a framework to promote ecological integrity and guide management on the Kaibab NF so that it is environmentally sustainable. Unless there is benefit to the land itself, increasing the number of cows only benefits the permittee. Or, we would not like to imagine, increasing beef production over the protection of the land itself. Beef can be raised on private land. Instead of grazing on private land, ranchers here in the southwest graze our public lands at the expense of the land and subsidized by taxpayers. This photo taken in the Prescott National Forest illustrates the difference between grazed and private pastures.



Private vs. Public Pastures, November 2018 Prescott National Forest,
Photograph by Jenny Cobb

In closing, we understand that it is explicitly stated that grazing is permitted to continue in the National Monument. However, we believe that cattle grazing is detrimental to the forest for the reasons we state above, and that increasing the number of cows does not allow for sustainability, but the opposite by increasing these hazards.

In addition to our original comments, we offer the following response and objection to the Final Environmental Assessment and Draft Decision Notice and Finding of No Significant Impact for the Rain Tank Allotment Grazing Reauthorization Project dated September 2025:

We strongly object to your choice of Alternative A based on the reasons stated in our June 13, 2025 comments, but more particularly because we did not observe sustainable forage for the existing cows grazing in the Rain Tank pastures let alone for the same number or more cows in the future.

In your final EA, you state “The grassland productivity data used in the TCA are based on mean relative difference of current biomass production in pounds per acre and the reference period. The grassland productivity dataset used for analysis covers 81 percent of the allotment area and shows that productivity is considered very good. The dataset does not contain productivity data for the remaining 19 percent of the allotment (USDA, Forest Service 2023b).”

We believe that drought conditions are present and will continue into the future.

Anecdotally, we have been monitoring certain pastureland in the Prescott National Forest, clear-cut several years ago and what we find year after year is no new grass, cactus, mesquites, thistles, sunflowers, and nightshade. The only way grass would grow would be to plant and water this pastureland.

In the EA you state “The Multidecadal Repeat-Dryness Exposure Index indicates that 94 percent of the allotment area received less precipitation than the long-term average from 1948-2021 for 40 to 50 percent of the years from 2000-2022. This means that for 50 to 60 percent of the years from 2000-2022, this area received average or above-average amounts of precipitation. The remaining 6 percent of the allotment area, roughly 4000 acres, received less precipitation than the long-term average from 1948-2021 for 50 to 60 percent of the years from 2000-2022. This means that for 40 to 50 percent of the years from 2000-2022, this area received average or above-average amounts of precipitation (Egan et al. 2024).

While the TCA classified the allotment as experiencing moderate drought conditions, and despite the fact that precipitation across the allotment has been below average roughly 50 percent of the years from 2000-2022, grassland productivity remains high in the area where productivity data are available (81 percent of the allotment).”

If there was above-average precipitation, why isn’t their sustainable forage in these pastures. In June, we did see a small healthy patch of grass growing adjacent to the road across from the old corral.

In conclusion, we do not support your alternatives

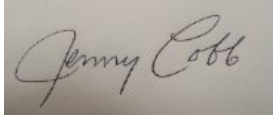
Selected Issues	Alternative A – Proposed Action - Continue to authorize livestock grazing on Rain Tank under updated terms and conditions.	Alternative B – No Livestock Grazing/ No Improvement Projects
-----------------	--	---

We would support an Alternative C, agreeing that that the current status of grazing continue but Instead of increasing the number of cows, we ask that you concentrate your efforts on at least maintaining but hopefully taking action to improving the condition of the grazing pastures. Only repairing and even making structural range improvements when absolutely necessary to maintain the status quo with the current number of AUMs. Further, we would like to see you improve the current conditions for the native wildlife present in these pastures.

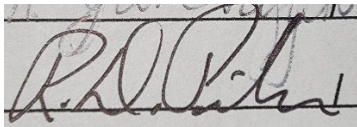
With concern for the future of our wildlands, we ask you to work towards an end goal of retiring grazing permits on public lands before irreputable damage occurs.

Broads and Sierra Club appreciates your time and attention to considering our comments and hope that together we can be responsible stewards of our precious public lands.

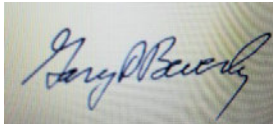
Environmental Partners for the Wild,

A handwritten signature in cursive script that reads "Jenny Cobb".

Jenny Cobb
Leader Yavapai-Prescott Broadband
Great Old Broads for Wilderness

Two lines of contact information that have been completely redacted with black boxes.A handwritten signature in cursive script that reads "Russell Pilcher".

Russell Pilcher
Conservation Chair
Sierra Club – Yavapai Group

Two lines of contact information that have been completely redacted with black boxes.A handwritten signature in cursive script that reads "Gary Beverly".

Gary Beverly, PhD
Chair, Sierra Club – Yavapai Group
PO Box 176 Chino Valley, AZ 86323