



November 17, 2025

Bobbi Filbert
District Ranger
Prescott National Forest
Bradshaw Ranger District
344 S. Cortez St.
Prescott, AZ 86303

Attn: Bradshaw Vegetation Management 2

Filed Electronically:
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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 has 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 about the future well-being of our forests.

Broads and Sierra Club, agree that "Large, high-intensity wildfire poses a threat to the communities and people that live, work, recreate, and travel in and near the project area." We believe that the ecosystem or landscape has an inherent capacity to maintain its basic structure and organization in the face of disturbances, whether caused by humans wildlife, fire, flooding. Will an environmental Impact Statement (EIS) be produced for this large project?

We believe that there should be a balance between natural wildfire, prescribed fire, and suppressed wildfires.

We believe that literally destroying 65, 575 acres would be harmful. This represents .2796% of the Bradshaw District of the Prescott National Forest (PNF).

Old-Growth Forest

Old-Growth Ponderosa pines are important to the ecosystem. These trees increase genetic diversity. The thick bark makes them pretty much resistant to low-intensity fire. They provide wildlife habitat. In the recent past, we have visited the PNF where logging has taken place and found many old-growth trees removed for sale. This is unacceptable, unless it is necessary to remove them for community protection or where restoration goals must be met. There is some evidence that fires burn even more intensely after logging. Fuel is left behind. Canopies might have been destroyed. Low density might produce heavier winds which fuel wildfires. We understand that you are carefully planning the density of the forest. However, on a personal note, we find it upsetting to see miles of park-like forest instead of the expected deep and dark mystery of the forest. Thank you for keeping out of our wilderness, roadless wildlands. We sincerely hope that the current administration can be stopped from destroying huge amounts of our national forests and even venturing into wilderness areas for financial purposes with no regard for environmental damage.

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Soil and Vegetation

You must not destroy watershed when disturbing soils and removing vegetation.

Carbon Sequestration

It is a given that logging releases more carbon into the air than even vehicles. This makes it very important to preserve as much of our forest as is reasonable for today and the future.

Watershed

We have located a study (PLoS One. 2014 Oct 22;9(10):e1111092.

doi: [10.1371/journal.pone.0111092](https://doi.org/10.1371/journal.pone.0111092), Effects of Climate Variability and Accelerated Forest Thinning on Watershed-Scale Runoff in Southwestern USA Ponderosa Pine Forests. [Marcos D Robles](#) ^{1,*}, [Robert M Marshall](#) ¹, [Frances O'Donnell](#) ², [Edward B Smith](#) ³, [Jeanmarie A Haney](#) ¹, [David F Gori](#) ⁴⁾

which states that “mechanical thinning and fire treatments are planned for 238,000 hectares (588,000 acres) of ponderosa pine (*Pinus ponderosa*) forests across central Arizona, USA . . .

“The widespread pattern of forest drying, evidenced by ecosystem level moisture deficits and larger and more severe wildfires, indicates we are entering a new era of forest management. The 4FRI project is an example of a restoration effort that is addressing this challenge in two ways: establishing objectives to improve resilience and increasing the scale at which management tools are applied. Our study demonstrated that this type of project can increase runoff by approximately 20% compared to unthinned forests, even under simulated drought conditions. If treatments at this scale are completed and repeated over the next several decades, increases in runoff could help offset the current and projected declines in snowpack and stream flow due to warming while improving the resilience of forest stands. As an incidental benefit in an era of dwindling water supplies and projected water shortages, forest thinning could play a role in augmenting river flows on a seasonal basis, improving conditions for water-dependent ecosystems, and benefitting the water supplies of downstream communities. Accelerated forest thinning to reduce water stress and wildfire risk is one of the only management options under our control, and it is probably the most critical to apply over the short term. Because the effects are temporary, it is important to frame accelerated thinning as a reset of ecosystem resilience, not a permanent cure. Rather, accelerated forest thinning creates opportunities to apply other management tools that restore forest resilience at broader scales, whereas management actions at the current pace will likely not be sufficient to address recent and projected changes in forest conditions.”

It is important to note that they state that the effects of thinning are temporary and not a permanent cure. We believe in science and demand that the PNF collect data on watershed issues and others including soil, wildlife, vegetation, climate effects, greenhouse effects, and other results of your vegetation project.

Prepare and Protect your Homes

Because we are in high possible wildfire area, we have experienced insurance companies refusing to insure us. We are subsidizing people who choose to live in the forest by paying higher premiums. We understand that the National Forest has a responsibility in wildfire protection but believe that programs to educate humans living adjacent and surrounded by forest in how to protect their property and structures including clear cutting around their homes and installing fireproof roofs and more. We all need to do our parts in keeping our communities safe from wildfire but never at the expense of the purpose of the PNF as stated herein.

Wildlife

You propose destroying up to 28% of forest vegetation. Birds and animals will suffer. They eat and spread seeds. Wildlife needs the protection of the dense forest from predators. Thank you for your consideration of the endangered Mexican Spotted Owls, Northern goshawks and others. With your “fire prevention” project, you are decreasing their essential habitat.

Grazing

Grazing is a major cause of wildfires. Cows deplete the fine fuels that prevent fires traveling into the crowns of our forest trees. 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.

Climate Change

Some research implies that climate change is responsible for increasing wildfires across the western United States. It is reasonable to say that with climate change – drier and hotter weather, fires will certainly continue to get bigger, and more disastrous. We are concerned about the sustainability of your actions. Climate change impacts are a result of interactions between climate, vegetation, topography, humans, wildlife, and more. Because of the complexity of these interactions, we feel that sustainability which is conditions that support native species, ecosystem services, and ecological processes when influences on them have not resulted in significant depletion or permanent damage, will not be met. That your actions are drastic and might actually accelerate climate change. Other stresses on climate change might include insects, pathogens and grazing.

All Fire Is Not Bad

As we have covered herein, we agree with what the Wilderness Society has published regarding the myths of wildfires:

1. Myth: Wildfires are natural and should be allowed to burn freely

Reality: Driven by climate change, wildfires pose a huge threat and demand careful forest management practices

2. Myth: Logging forests prevents wildfires

Reality: Fires may burn more intensely in logged forests

3. Myth: All wildfires are bad and should be stopped immediately

Reality: Protecting people is top priority, but fires play an important ecological role

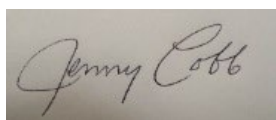
Purpose of the Prescott National Forest (PNF) and the Importance of Protecting it

On a field trip several years ago, Forester Roe educated us on the history of the PNF, emphasizing that their primary goal since 1948 was to suppress wildfire. However, the original purpose when the Prescott National Forest, was set aside in 1898 was to protect water sources for area communities. Today, the Forest provides clean water, range for livestock grazing, minerals, timber, and habitat for fish and wildlife. Breath-taking scenery and excellent year-round recreational opportunities fuel the economy with demand for sporting goods, food and lodging, field guides, and transportation. PNF 1.25 million acres, 8 wilderness areas. "Prescott National Forest is guardian of 950 miles of scenic trails and more than 100,000 acres of wilderness. Its mild climate allows for outdoor adventures year-round. From picnicking, developed campsites and gentle trails to rock climbing, bouldering, dispersed camping and rafting on more than a million acres of incredible landscapes, there's something for everyone to see and do!" "Humans have occupied what is now Prescott National Forest for at least 12,000 years. The desert Southwest holds an extraordinary record of the past. Rock shelters, cliff dwellings, pit house villages, pueblos, incredible rock art, and the remains of historic homesteads, railroads, and "ghost towns" are but a few of the wonders that await your discovery. Archeological sites give visitors the opportunity to peer into the past which can spark wonder, delight, surprise, and reflection. More-recent Forest history was shaped by mining, grazing, and timber harvested to satisfy the needs of settlers of European descent. This rich past can still be found in many recreation sites across the Forest."

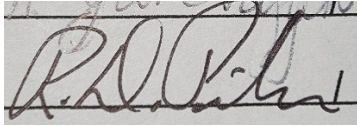
Obviously the PNF is important to everyone who lives here, and the economy in the form of visitors with the main attraction being the forest itself with wilderness, trail, archeological/history, wildlife viewing, scenic views, camping, bicycling, and even finding a gold nugget. We ask that you do not destroy that ambience by destroying a large part of the PNF with your thinning project. Do a little first, and record and scientifically study those results before going ahead with more based on the need for sustainable wildlife and human habitat, water supply, healthy air, and recreational opportunities. Our wildlands must be preserved for today and the future of our planet and humans and wildlife who reside on her.

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.

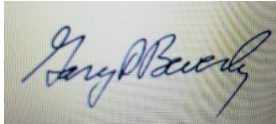
Environmental Partners for the Wild,

A handwritten signature in cursive script that reads "Jenny Cobb". The signature is written in dark ink on a light-colored, slightly textured background.

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A handwritten signature in dark ink, appearing to read "R. Pilcher", written over a horizontal line.

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A handwritten signature in blue ink, appearing to read "Gary Beverly", written over a horizontal line.

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