

---

**File Code: 2200**

**Date: January 22, 2026**

Cyndi Tuell  
Arizona and New Mexico Director  
Western Watersheds Project  
738 N. 5th Ave., Suite 206  
Tucson, AZ 85705

Dear Ms. Tuell,

I appreciate your continued interest in the Tonto National Forest's Rangeland Management program and am responding to your letter regarding management of the Reavis-Tortilla Allotment on the Mesa Ranger District. On January 9, 2024, District Ranger Lane issued a term grazing permit and authorized grazing use by 435 yearling cattle from January 15 through June 15, 2024, on the Reavis-Tortilla allotment. Management direction was provided to the permittee in the AOI dated January 10, 2024. District Ranger Lane's issuance of a term grazing permit in 2024 followed review of the existing Allotment Management Plan and Decision. No new information or changed circumstances were identified in a NEPA Sufficiency Review. Issues identified were mitigated by not allowing use of one pasture containing a stocked population of Gila topminnow. Ranger Lane complied with the Tonto National Forest Land Management Plan. Additionally, his authorization is within the language cited from the Forest Plan Objection Response: additional NEPA is not needed because NEPA has been completed and there have not been significant changes since the previous NEPA was completed. All permits, bills, and annual operating instructions were completed properly, and the permittee is in compliance with the terms of the permit.

Per Forest Supervisor Bosworth's September 2024 response letter (attached), our process for restocking vacant allotments does not require a public process so long as the allotment is authorized to graze in accordance with existing NEPA. The occurrence of fire on an allotment in and of itself does not always result in a changed circumstance that would require additional NEPA before restocking after the fire. In fact, fire on an allotment most often results in increased forage production.

The Reavis-Tortilla allotment had previously been used in the winter of 2021/2022 as a forage reserve for a permittee affected by the Telegraph Fire. It was then authorized for use in 2024 as stated above. The allotment was planned to be used in the winter of 2025, but due to drought conditions, the AOI was rescinded and no use occurred. Recently, following an exceptional fall precipitation season, District Ranger Kilford authorized use of the allotment from December 15, 2025 – June 15, 2026, by 600 yearling cattle and 5 pack and saddle horses.



I would like to extend an invitation to meet with you to discuss any specific concerns you may have regarding our process and policies for stocking vacant allotments. Please contact Jaime Dominguez, Administrative Operations Specialist, at 602-225-5280 or [Jaime.dominguez@usda.gov](mailto:Jaime.dominguez@usda.gov) to schedule a date and time.

Sincerely,

ERICKA  
LUNA

Digitally signed by  
ERICKA LUNA  
Date: 2026.01.22  
10:30:28 -07'00'

ERICKA LUNA  
Acting Forest Supervisor