

**Written Testimony of Kya Marienfeld
Wildlands Attorney
Southern Utah Wilderness Alliance**

**Before the House Committee on Appropriations, Subcommittee on Interior, Environment,
and Related Agencies
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Introduction

Chairwoman McCollum, Ranking Member Joyce, and members of the Subcommittee, I represent the Southern Utah Wilderness Alliance (SUWA), a Utah-based non-profit organization with over 15,000 members, dedicated to the preservation of the outstanding wilderness at the heart of the Colorado Plateau and the management of these lands in their natural state for the benefit of all Americans. SUWA and our members thank you for providing the opportunity to present our views on the Subcommittee's support for the Bureau of Land Management's (BLM) financial involvement in Utah's Watershed Restoration Initiative (WRI)—a partnership that has resulted in tens of millions of federal taxpayer dollars wasted on the destruction of native ecosystems throughout public lands in Utah.

While we fully agree with the Subcommittee's concern about the ongoing and worsening drought affecting the western United States, we do not support the Subcommittee's endorsement of BLM's financial partnership with the State of Utah through WRI.¹ The Subcommittee's support for BLM's continued engagement with WRI effectively green-lights the agency to commit millions of dollars each year towards native vegetation removal projects that often do not align with the Subcommittee's stated desire to protect western water resources.

SUWA submits this testimony in order to encourage the Subcommittee to take a closer look at BLM's multimillion-dollar funding of WRI projects, specifically those projects involving large-scale mechanical vegetation removal of pinyon pine, juniper, and sagebrush—done at the expense of native ecosystems, wildlife habitat, and the climate resiliency of BLM-managed public lands. In addition to concerns over the destruction of native ecosystems through WRI-funded projects, we also believe that BLM's continued financial commitment to WRI raises issues of transparency and accountability in agency spending, undermines the persistent claim that BLM is underfunded and cannot properly staff its field offices, and highlights potential conflicts of interest between the State of Utah and the Department of the Interior.

Vegetation Manipulation and WRI Funding

Utah's Watershed Restoration Initiative (WRI)—founded and coordinated by the Utah Department of Natural Resources—is a coalition of public and private entities created to fund and promote vegetation and habitat projects across federal, state, and private lands in Utah. The WRI coalition includes, in part, BLM, the Forest Service, the Utah Division of Wildlife Resources, public land grazing permittees, and hunting advocacy organizations such as

¹ H.R. Rep. No. 116-100, at 14 (2019).

Sportsmen for Fish and Wildlife, the Mule Deer Foundation, and the Safari Club.² Since 2006, WRI has funneled hundreds of millions of dollars toward vegetation manipulation projects on over one million acres of public, state, and private lands throughout Utah.³ The money-pooling function of WRI has inarguably produced a continual increase in vegetation removal on BLM-managed public lands in Utah—from the vast, mountain-ringed wildlands of the Great Basin to the redrock of the Colorado Plateau, including in Wilderness Study Areas and other wilderness-quality lands. While many of the projects funded through WRI are beneficial—such as the removal of invasive species or the restoration of river systems—WRI's bullish funding of landscape-scale, mechanical vegetation removal is resulting in irreparable damage to native pinyon pine, juniper, and sagebrush ecosystems.

In the Report accompanying the Department of Interior, Environment, and Related Agencies' Appropriations Bill for 2020, the Subcommittee highlighted its concern over ongoing drought in the western United States.⁴ In doing so, the Subcommittee overtly endorsed BLM's continued funding of WRI "to develop water resources to benefit the public, wildlife, endangered species, permittees, and other users," and encouraged BLM to "continue to work with the State and other interested entities to identify and pursue the highest priority projects."⁵

But what form do the projects that WRI funds to "develop water resources to benefit the public" actually take? An attempt to find these answers in WRI's public-facing materials falls quite short of specifics and instead turns up glossy fact sheets extolling the program's "protection and rehabilitation of vital habitats for wildlife," how WRI funds help "reduce the risk of catastrophic wildfires," and how WRI works to "increase forage for sustainable agriculture."⁶ All of these goals, it seems, can be accomplished through the very same means: by systematically removing large swaths of native vegetation, most often pinyon pine, juniper, and sagebrush.

Vegetation removal projects—called "vegetation treatments" or "habitat restoration" by BLM and WRI—take many forms. Sometimes the preferred method is prescribed burning or hand-thinning. More commonly, however, WRI invests in projects that employ heavy machinery and extensive surface disturbance. One prevalent method is "mastication," where a machine known as a bullhog masticator is attached to an excavator and is used to mulch vegetation from branch tips to roots, turning entire forests of live trees into thousands of acres of woodchips and stumps. "Chaining," a particularly heavy-handed approach, utilizes a large anchor chain dragged between two enormous bulldozers to rip live trees out of the ground, roots and all. Bulldozers travel back and forth with anchor chains that can weigh more than 20,000 pounds, uprooting hundreds of trees and any other vegetation in its wake with every pass. These chains destroy the fragile living soil crust that is the backbone of the Colorado Plateau ecosystem. Because of public outcry over chaining's particularly devastating impacts, BLM significantly scaled back on

² Utah's Watershed Restoration Initiative, *Restoring Watersheds Through Partnerships*, 3 (2019) available at <https://watershed.utah.gov/wp-content/uploads/2019/07/2019-WRI-Fact-Sheet-Page-1-4.pdf>

³ Utah's Watershed Restoration Initiative, *Utah's Watershed Restoration Initiative By the Numbers*, 1 (2019) available at <https://watershed.utah.gov/wp-content/uploads/2019/11/WRI-by-the-numbers-Infographic-Final-med-res.pdf>

⁴ H.R. Rep., *supra* note 1.

⁵ *Id.*

⁶ Utah's Watershed Restoration Initiative, *supra* note 2.

the practice in the 1990s, but in the last decade we've seen its re-emergence as a favored method of "treatment" throughout Utah.

Proponents of large-scale mechanical vegetation removal argue that although not aesthetically-pleasing, these projects are necessary for restoring a natural ecosystem—that they benefit wildlife like deer, elk, and other ungulates, and that they help prevent wildfires and rejuvenate watershed health. However, the problems with these treatments aren't merely aesthetic, and the best available science shows that, more often than not, large-scale mechanical vegetation removal has either non-significant (at best) or detrimental (at worst) effects on metrics like wildlife, fire prevention, and watersheds.

According to an extensive 2019 review of all existing scientific literature on mechanical vegetation removal, these projects have just one in three odds of improving forage for ungulates.⁷ Two-thirds of the time, mechanically removing vegetation has either a non-significant or negative effect on forage for these species.⁸ Regarding fire prevention, "recent studies suggest that climate has a greater influence on fire activity than fine fuels and biomass," and surface disturbances associated with mechanical vegetation removal may actually facilitate the expansion of cheatgrass and other invasive species that lead to increased fires.⁹ According to the report, "there is little research supporting the contention that removing pinyon and juniper reduces fire."¹⁰

Mechanical vegetation removal projects also disturb soils, which frequently leads to an increase in erosion and desertification. This is especially true in southern Utah, where ecosystems rely on biological soil crusts as an integral component of soil stability. In existing scientific literature, only 4% to 7% of treatments resulted in a decrease in runoff and erosion, with most research concluding that "treatments do not reliably increase water yield on a watershed scale, although water availability may increase in local areas."¹¹

All told, BLM is spending millions of dollars a year on projects with no proven track record of success and with no real game plan to develop the science necessary to increase those odds. While preventing drought and fire and protecting watersheds are laudable goals for BLM, science tells us that the large-scale disturbance of Utah wildlands resulting from WRI-funded vegetation removal can actually make these problems worse. Furthermore, WRI's funding regime has created a tail-wagging-the-dog situation—as the pool of WRI money has grown, so has the size and scale of vegetation removal projects proposed by BLM.

⁷ Alison Jones, lead ed., *Do mechanical vegetation treatments of pinyon-juniper and sagebrush communities work? A review of the literature*, 25-27 (2019) available at https://static1.squarespace.com/static/57c5f6aa579fb31d71581457/t/5c746d0a9140b757cca49418/1551133978337/2019_MechVegTrt_LitReview.pdf

⁸ *Id.*

⁹ *Id.* at 5.

¹⁰ *Id.*

¹¹ *Id.* at 6.

Since 2006, BLM has contributed over \$80 million dollars in funding to support WRI projects.¹² In 2019 alone, BLM contributed over \$10 million dollars to WRI.¹³ Looking at treatments listed by acreage, it appears that only a small percentage of BLM funding to WRI actually directly benefitted watersheds and riparian resources.¹⁴ This subverts the Subcommittee's intent in encouraging the partnership between BLM and WRI for protecting water resources.

Despite making these “big picture” numbers available to the public, it is exceptionally difficult to follow the trail of financing from congressional appropriation to BLM funding of large-scale vegetation removal projects through WRI. Because of this, SUWA is concerned that discretionary agency monies are being moved away from other needs—such as filling critical staffing vacancies throughout Utah BLM field offices in positions ranging from law enforcement officers to biologists and archaeologists—and is instead being transferred to a money-pooling coalition largely controlled by the State of Utah. Rather than protecting water resources, this taxpayer money is being used to fund the removal of native vegetation, which results in a degraded ecosystem where the only consistent beneficiaries are grazing interests. The concern over a lack of transparency in regard to BLM appropriations is heightened when considering the recent revolving door between leadership at the Department of Interior and the State of Utah.¹⁵

We are not advocating that truly degraded ecosystems can never benefit from human help, but rather that the Subcommittee should not continue to effectively grant BLM blanket approval to fund large-scale, heavy-handed, and destructive vegetation removal projects through the WRI partnership. We believe that additional appropriations oversight is necessary to ensure that BLM's funding pipeline for "vegetation treatment" or "habitat restoration" projects is transparent, that projects are grounded in high-quality science and monitoring, and that discretionary BLM funds are not being diverted from necessary staffing and resource needs towards WRI. As was made clear in the 2019 scientific report, “[a]s changing climatic conditions make predicting the results and risks of mechanical treatments even more uncertain, public land managers should aim for more transparency in the decision process to explain the expectations for a project and the science guiding the planning effort.”¹⁶

Conclusion

Thank you for the opportunity to submit testimony regarding the Subcommittee's support for BLM's financial involvement in WRI. We encourage the Subcommittee to take a hard look at its endorsement of this partnership, issues of accountability both through BLM's funding process as well as when public funds are in WRI's hands, and WRI's continual promotion of projects that benefit small economic interests at the detriment of all other resource values.

¹² Press Release, BLM Utah Announces Five-Year Agreement with the Utah Department of Natural Resources as a Part of Utah's Watershed Restoration Initiative (Dec. 31, 2019) available at <https://www.blm.gov/press-release/blm-utah-announces-five-year-agreement-wri-dnr>

¹³ *Id.*

¹⁴ *Id.*

¹⁵ "Herbert picks a top national BLM official and former Stewart aide to lead Utah Department of Natural Resources," Salt Lake Tribune (April 29, 2019), available at <https://www.sltrib.com/news/environment/2019/04/29/herbert-picks-top/>

¹⁶ Jones, *supra* note 7, at 7.