# **Upper Kanab Creek Watershed Vegetation Management Project**

Environmental Assessment # UT-040-09-03



Aerial photo of land slated for vegetation devastation. Photo by Ray Bloxham

# **Summary of Proposed Project**

- The Upper Kanab Creek vegetation devastation project covers 130,000 acres, including 90,000 acres of arid, high-elevation deserts of southern Utah managed by the Bureau of Land Management (BLM). The BLM proposes to remove old-growth pinyon and juniper trees, and sagebrush on 51,600 acres of land.
- The EA leaves open the possibility that adjoining lands managed by the U.S. Forest Service, private landowners, and the State and Institutional Trust Lands Administration could also be "treated" to remove pinyon and juniper trees, as well as sagebrush.
- The purported purpose of the project is to "rehabilitate" vegetation and reduce the risk of catastrophic fire in areas that are dozens of miles from the nearest towns. BLM proposes to use a variety of tools, including large machines that crush pinyons and junipers, reducing them to sawdust and wood chips in a matter of seconds, toxic chemical herbicides, prescribed fire, seedings, and short-term modifications of domestic livestock grazing.
- The project will destroy 90–100% of the live pinyon and juniper in some areas, as well as substantial amounts of sagebrush.

# Located in Grand Staircase-Escalante National Monument and Adjacent Proposed Wilderness Areas



Upper Kanab Creek proposed wilderness area. Photo by Ray Bloxham

- The vegetation devastation project is planned for the western portion of the Grand Staircase-Escalanate National Monument and BLM lands west of the Monument.
- The vegetation devastation would occur in two areas proposed for wilderness in America's Red Rock Wilderness Act: 1) Timber Mountain which lies entirely within the Monument, and 2) Upper Kanab Creek which is partially within the Monument and extends west of the Monument.
- The project area is near the Utah/Arizona border and north of the community of Kanab, Utah. The area is characterized by high, forested plateaus of steep and scenic Navajo Sandstone walls. These cliffs form one of the principle steps in the Grand Staircase and offer a striking view for travelers along Highway 89. These wild and remote areas boast narrow and convoluted slot canyons that have been carved into the sandstone throughout the ages.
- In addition to the prominent and colorful canyon walls, these areas are home to a variety of vegetation, including stands of ponderosa pines, manzanita, oak, yucca, cacti, sagebrush, and pinyon and juniper. These natural ecosystems provide excellent habitat for elk and the famed Paunsaugunt mule deer herd, and their predators, including the elusive mountain lion.
- In addition to these natural treasures, the plateaus, canyons and valleys of this area contain extensive artifacts from past human cultures, including pit houses and decorated pottery sherds that are many hundreds of years old.

#### **Science**

- SUWA has reviewed relevant scientific literature and has consulted with professional ecologists, botanists and soil scientists about this proposed project, and these scientists have expressed concerns with the proposal.
- This proposed project is particularly inappropriate given what we know about climate change and the effects of dust from disturbed desert soils on early snowmelt in Colorado. In order to capture carbon, reduce dust, and combat climate change, southwestern Utah's soils and ecosystems must remain undisturbed and intact.
- In addition, ground disturbance and the loss of native plant life encourages the spread of highly flammable weeds like cheatgrass.
- It is important for BLM to understand the historical range and site-specific ecological dynamics of pinyon-juniper forests before conducting treatments. New research shows that shifts in climatic factors have been instrumental in defining the expansion pinyon-juniper forests.

## See the following scientific articles linked on the Press Release page:

- Schwinning, S., Belnap, J., Bowling, D.R., and Ehleringer, J.R., Sensitivity of the Colorado Plateau to Change: Climate, Ecosystems, and Society, ECOLOGY AND SOCIETY (Vol. 13, Iss. 2, Art. 28) (2008)
- Thomas H. Painter et al., Impact of Disturbed Desert Soils on Duration of Mountain Snow Cover, Geophysical Research Letters, Vol. 34, L12502 (June 2007)
- Belnap, J. and Gillette, D.A., *Disturbance of Biological Soil Crusts: Impacts on Potential Wind Erodibility of Sandy Desert Soils in Southeastern Utah*, LAND DEGRADATION & DEVELOPMENT, Vol. 8, 355-362 (1997)
- Neff, J.C., et al., Soil Carbon Storage Responses to Expanding Pinyon-Juniper Populations in Southern Utah, ECOLOGICAL APPLICATIONS (2008)
- Reid, Chad R., Goodrich, Sherel, and Bowns, James E., *Cheatgrass and Red Brome: History and Biology of Two Invaders*, USDA Forest Service Proceedings (2008)
- Romme, William, et al., *Historical and Modern Disturbance Regimes, Stand Structures,* and Landscape Dynamics in Pinon-Juniper Vegetation of the Western U.S., Colorado Forest Restoration Institute (June 4, 2008)
- Barger, Nichole, et al., *Influence of Livestock Grazing and Climate on Pinyon Pine (Pinus edulis) Dynamics*, RANGELAND ECOLOGY AND MANAGEMENT, Vol. 62, 531-39 (November 2009)

### **BLM's Environmental Assessment is Inadequate**



Area in central Utah following mechanical vegetation devastation. Photo by Tiffany Bartz

- Although BLM's proposal suggests that pinyon-juniper trees have encroached into other ecosystems, BLM's EA fails to provide documentation of the pinyon-juniper forests' historic range.
- Although the Utah BLM has conducted vegetation devastation projects for decades, the EA fails to provide documentation or evidence that such projects are successful, or that the "treated" areas thrive in the long term, especially in arid, high desert lands similar to the Upper Kanab Creek project area.
- The EA fails to assess the carbon sequestration provided by pinyon-juniper forests (from both trees and soils), and the likely impacts from removing the trees and disturbing the surrounding soils. The EA likewise fails to take into account the current long-term drought, and the effects of climate change.
- The EA states that one purpose of the proposal is to reduce hazardous fuels and risk to life and property. However, this project is not proposed for a wildland-urban interface where risks of catastrophic wildfire are a concern.
- BLM's EA fails to adequately consider the impacts of domestic livestock grazing on the vegetation and wildlife habitat. The EA fails to include an alternative that analyzes the benefits to wildlife and vegetation of reducing domestic livestock grazing in the project area.
- The EA fails to adequately consider the impacts of the proposal on wilderness values.
- The project is incompatible with the Proclamation and management plan for the Grand Staircase-Escalante National Monument, which emphasize that the Monument must be managed to protect the natural resources of the Monument.
- The EA fails to include a comprehensive monitoring plan that would aid the BLM in determining what "treatments" are effective and what treatments are failures.
- There might be circumstances when expansive vegetation manipulation is appropriate, such as invasive species control. However, this type of invasive manipulation is not appropriate in the Upper Kanab Creek area.