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Title:
Comments: Pedlar River North Vegetation Project #58783

I am opposed to the proposed project which includes clear cutting. It has been shown to be harmful to the environment and to the local ecosystem. I do a lot of hiking and like to read about the areas I am going to visit. A few years ago I went hiking on the Lolo Trail, the same trail used by Lewis and Clark. One of my readings was a book by Bud Moore: the Lochsa Story: Land Ethics in the Bitterroot Mountains published in 1996. The author, a member of the U.S. Forest Service in the Bitterroot Mountains of Idaho/Montana, describes how he started out thinking his job was to facilitate logging in the government owned land. Over the years he came to realize that the logging, primarily clear cutting, was causing major damage to the ecosystem and that the sustainability of the ecosystem was his primary responsibility. With a lot of opposition from commercial interests, he was able to develop a sustainability model for the use of the resources in what now is called "ecosystem management". I have seen the forest in the Bitterroots where clear cutting was performed on private land. It makes you want to cry.
A holistic approach to forest management considering the long term adverse impact of clear cutting on the forest, especially water quality and drainage issues resulting from the proposed destruction. The potential damage to the Pedlar Reservoir needs to be included in the cost benefit study and the negative impact of the impermeable surfaces on runoff when required roads are made. Where I live, my water supply comes from the Pedlar Reservoir and I am thereby potentially harmed by the proposed project.
The impact of the changing climate needs to be addressed. One of the adverse environmental events that is increasing each year is downpours. With a warming climate, and it has increased world-wide at nearly 1 deg. C since 1950, the atmosphere can hold more water vapor. Each one degree C increase in air temperature results in 7 percent more water vapor. The rain is not always coming down in gentle patterns any more, but as 3-4 -5+ inch downpours. This causes major erosion in clearcut areas and is a high and increasing risk in the Pedlar Reservoir and Project area. The EIS needs to incorporate the negative impacts of these downpours; and to incorporate the increasing numbers and quantity of water and probable impacts in coming years.
A related issue is the loss of the forest cover as a sink for CO_2 . The Environmental Impact Study needs to incorporate the social cost of carbon into its analysis. The social cost should consider the impacts outside the narrow boundaries of the National Forest and the U. S. and use the same discount rate as used for forest roads in other cost benefit studies.
Beyond the loss of the sink capabilities, is the problem of the disposition of the materials removed and the impact of the land disturbance and likely burning involved. The resulting use of the materials as a source of CO_2 needs also to be calculated and incorporated in the EIS. That is, the negative impacts of burning cut and waste materials in terms of impact of additional carbon dioxide emissions.

It is difficult to imagine that an objective analysis of all the negative impacts on the environment and ecosystem would justify clear cutting a beautiful, useful forest.

Please abandon this project.

Thank you,
Gregory T. Haugan, Sr. PhD
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