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Philip Monsanto, District Ranger
Clackamas River Ranger District
Mt. Hood National Forest
16400 Champion Way
Sandy, OR 97055

Via: https://www.fs.usda.gov/r06/mthood/projects/68848

Subject: Anvil Vegetation Management Project Comments

Dear District Ranger Monsanto,

Please accept the following comments from Oregon Wild concerning the Anvil Vegetation Management Project (Project) being planned in the Clackamas River Ranger District as described in project notification dated October 16, 2025 (Project Notification). Oregon Wild represents 20,000 members and supporters who share the organization's mission to protect and restore Oregon's wildlands, wildlife, and water as an enduring legacy. Oregon Wild's goal is to protect areas that remain intact while striving to restore areas that have been degraded. This can be accomplished by moving over-represented ecosystem elements (such as logged and roaded areas) toward characteristics that are currently under-represented (such as roadless areas and complex old forest). Oregon Wild appreciates the opportunity to provide scoping comments at this stage in the Project development process.

The purpose of the Project is "to improve forest health and diversity and reduce excessive fuel loading primarily along roads." The Project includes various treatments such as thinning, reducing surface fuels, prescribed burning, and roadside treatments. The Project Notification also indicates that the Project presents the opportunity to provide forest products. Within the planning area, approximately 4,000 acres may be proposed for vegetation and fuels management treatment.

Oregon Wild suggests that the Forest Service prepare an EIS to evaluate the impacts of the proposed Project on the environment. The Project may have significant impacts on numerous resources and values, as described further below, so an EIS is the most appropriate tool to consider these potentially significant impacts and various alternatives that may be appropriate to meet the purpose and need of the Project.

As an initial matter, Oregon Wild believes that applying an Emergency Action Determination (EAD) pursuant to Secretarial Memo 1078-006 is inappropriate for this Project. Of the 4,000

acres proposed for treatment in this project, 89% is within the area designated under the Emergency Situation Determination (ESD). The Project Notification indicates that forest is more susceptible to large-scale disturbances, and that past practices have resulted in elevated fuel loading along roads, potentially increasing the risk to firefighters during wildfire response. Fire plays a vital role in the forest ecosystem, and logging to reduce fire risk can be counter-productive by allowing more surface and ladder fuels to grow where canopies have been opened up and surface fuels removed. As of submittal of these comments, we are going into the winter months when fire risk is lower and will stay low for half the year. As such, it's not apparent that an actual emergency exists at this point in time that requires this project to proceed under an EAD rather than going through the NEPA process. And, given that the Forest Service states it is "considering applying this authority to this project," it seems that the Forest Service is also not convinced that an emergency exists at the moment, at least not an emergency requiring urgent action. By evaluating the environmental impacts through the NEPA process, the Forest Service will better understand and assess the trade-offs that the proposed action has on the project area, including on fire risk and how different alternatives can impact fire risk into the future.

Oregon Wild suggests that the Forest Service consider the following in planning the Project and going through the NEPA process:

1. **Thinning in young plantations versus natural stands.**

Oregon Wild is generally supportive of thinning that is carefully planned and implemented in young, dense plantations that are accessible from existing roads. While all logging, including thinning in young stands, includes some adverse impacts and trade-offs, it is generally accepted that the benefits of thinning in very young stands outweighs the adverse impacts of logging by creating some beneficial effects. The Project Notification indicates that treatments will be focused in stands less than 80 years old. Oregon Wild is supportive of this directive, but suggests that the Forest Service go even further by ensuring that treatments *only* occur in stands less than 80 years old. The Northwest Forest Plan (NWFP) recognizes 80 years as a useful place to draw the line between forests that are likely to benefit from silviculture and those that are likely to experience net negative consequences. In thinning young stands, the Forest Service should use treatments that move the characteristics of the forest toward those of late-successional forests, including retaining larger diameter trees, leaving snags and down wood, and incorporating variability in both spacing and sizes of trees. Oregon Wild does not support treatment in stands of trees over 80 years old, especially if the older stands are naturally regenerated. The Project Notification mentions that mature and old-growth plant communities reside in the planning area. Are these plant communities any of the stands proposed for treatment? As a threshold point of information before analysis, the Forest Service should disclose the breakdown of naturally regenerated stands versus plantations for both young and mature stands that are proposed for treatment.

The Project map indicates that most units proposed for logging occur in the Matrix allocation under the NWFP. What are the ages of these specific stands? Additionally, some of the proposed units, and many of the proposed units that appear to be roadside treatments, fall within the riparian reserve land use allocation under the NWFP. Please also provide detailed information

regarding stand ages and treatment prescriptions within all riparian reserve units. Finally, the Project map shows that one logging unit and several miles of roadside treatment are proposed within the Late Successional Reserve allocation. What are the ages in stands located in the LSR, and why is the Forest Service proposing to treat these? Under the NWFP, LSRs are to be managed to protect and enhance conditions of late-successional and old growth forest ecosystems. The trade-offs of logging in mature stands are significant. The negative effects on soil, dead wood and dead wood recruitment, wildlife habitat, microclimate, natural fire resilience and other resources and values generally outweigh any beneficial outcomes. The Forest Service should drop the unit proposed in the LSR and perform a detailed analysis of the effects of proposed roadside treatment within the LSR.

2. **Impacts to northern spotted owl.**

Oregon Wild is concerned about the impact of the proposed project to the northern spotted owl. A significant portion of the planning area is within designated critical habitat for the northern spotted owl. Some of the proposed units abut with northern spotted owl activity centers in LSR and some of the proposed roadside treatment units both abut and cut through northern spotted owl activity centers in LSR, as shown on one of the Project maps. Accordingly, the Forest Service must give special attention to conserving owl habitat and mitigating threats to the species, including threats caused by the barred owl.

The Forest Service should also consider the cumulative impacts that this project will have to northern spotted owl when considered along with other projects taking place in the Mt. Hood National Forest. Past, present and future projects immediately near the Anvil planning area include Basin Thinning and Stone Creek Vegetation Management. Further to the northeast, other projects in the forest include Gibson Insect and Disease, South Fivemile Insect and Disease, 27 Road Fuel Break, Hootnanny Insect and Disease, South Pen Insect and Disease, Grasshopper Restoration, and Gate Insect and Disease. The Forest Service should analyze the Anvil Project in light of the effects that will occur to the northern spotted owl from the projects listed in this paragraph and any other projects the Forest Service is aware of in the Mount Hood National Forest.

Overall, it's clear that the Project may have direct and indirect significant impacts on the northern spotted owl and that the Project may also have cumulative impacts on the species. The Forest Service should therefore prepare an EIS to evaluate these impacts.

3. **Fuel breaks.**

Fuel breaks can have significant trade-offs, especially when accomplished with commercial logging, temporary roads, and significant canopy reduction. Fuel breaks in the form of roadside treatment, especially when conducted in LSRs or riparian reserves, can degrade habitat for late successional species including northern spotted owl, snag-associated species, and big game that need cover to cross roads. Oregon Wild suggests that the Forest Service mitigate the negative effects of fuel breaks by thinning only the minimum width along the road necessary to accomplish a fuel break in harmony with other forest values and resource conservation. The

Forest Service should also ensure that fuel breaks remain densely shaded. This will help reduce the risk that surface and ladder fuels will flourish in the newly opened-canopy, reduce future maintenance cost, reduce the risk of weeds, and reduce barriers to wildlife movement. Ideally, fuel breaks along roads should be implemented non-commercially and include a 7-9" dbh limit to reduce the need for roads and help maintain canopy cover to maintain a cool and moist microclimate.

Please provide details on the treatment prescription that is proposed in roadside units, and describe how the Forest Service intends to maintain fuel breaks over time. Will the Forest Service clear out new surface and ladder fuels on a regular basis? If not, roadside fuel treatments have the potential to increase fire risk in the long-term even if there are short-term reductions to fire risk.

4. **Effects of roads.**

While many of the proposed units for treatment occur along existing roads, many other proposed units will likely require construction of additional roads to implement treatment prescriptions. Oregon Wild is concerned about the need to build additional roads within the Project area. Roads fragment landscapes and modify wildfire behaviors, increase likelihood of erosion and risk of landslides, introduce sediment into waterways, spread invasive weeds, increase risk of fire starts, and introduce trash. Even "temporary" roads are not truly temporary and carry environmental harms and risks after closure. The Forest Service should analyze the significant impacts that road construction will have within the Project area on soil, water, vegetation, wildlife, and fire risk. The Forest Service should also aim to minimize new road construction as much as possible, and should avoid wet weather hauling. The Forest Service's road network is already massive and in need of repair, and building more unnecessary roads will only add to the Forest Service's backlog of required road work while degrading the environment.

5. **Effects to adjacent wilderness areas.**

The Project area is immediately adjacent to two wilderness areas. In the south, the project area abuts a portion of the Clackamas Wilderness ad there is a nearby proposed unit. In the north and northwest, the project area abuts the Roaring River Wilderness. Here, proposed units along the road network are on the boundary with the wilderness area. The Forest Service should consider the impacts that the proposed treatment will have on wilderness values and characteristics. The effects of logging on these values and characteristics is relevant to the NEPA analysis

Thank you for considering these comments.

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