

I live in Portland, and Mt. Hood National Forest is effectively my backyard — it's where I go for food, for quiet, and for a break from the city. For years, my wife and I have hunted, fished, camped, and backpacked through the Shellrock area of the Clackamas River Ranger District. One of our first backpacking trips together was in this stretch of forest, and I've harvested venison there that's fed my family more than once. I don't think of this as "public land" in some abstract sense — it's a place I know on foot, in the dark, in the rain, and it's part of how I feed myself and stay grounded. What I value most about these forests is exactly that mix: working landscapes that still function as habitat, still hold clean cold water, and still feel wild enough to get lost in.

That's the lens I'm bringing to this project. I remember the summer of the Riverside Fire well — the smoke that hung over the city for days, the closures, and that unsettled feeling that this place I knew so well might not come back the same, or that some of it might be gone for good. I don't doubt the Forest Service's concern about fire risk. But I'm concerned about the way this project is being pushed through under an Emergency Action Determination, and I'd like the Forest Service to address the following directly in the EA response to comments:

1. What specific hazards to human health and safety, and what specific threats to natural resources, is the Forest Service identifying as the basis for applying the Emergency Action Determination to the Anvil project?
2. What kind of mitigation or relief is the Forest Service trying to achieve with each category of proposed action — the 2,053 acres of commercial thinning, the 1,499 acres of roadside fuels reduction, the 942 acres of prescribed fire, and the ~7 miles of temporary road construction?
3. Do all of these actions actually fall within the categories of Authorized Emergency Actions under Section 40807 of the IIJA?
4. Specifically — where does commercial thinning of plantation stands fit within the AEA categories? If it doesn't fit cleanly, has the Forest Service explained why it's being authorized as an emergency action anyway?
5. For each action, does the EA explain what hazard or threat it addresses and what relief or mitigation will actually result, as required by the statute?
6. How, specifically, will logging 2,000+ acres of plantation forest and building new temporary roads provide "relief from hazards threatening human health and safety and threats to natural resources" in this watershed?

I'd ask the Forest Service to answer these questions plainly rather than relying on general references to wildfire risk in the Cascades. The area I hunt and fish in is part of this same forest type — moist, mixed-severity Douglas-fir and hemlock — and I know from spending time in these stands that a lot of what's being proposed looks like routine plantation management, not emergency hazard mitigation. If that's the case, it deserves the normal environmental review process, not an emergency designation that shortens the public's ability to weigh in.

Two more specific asks, tied directly to how I use this land:

Botanical surveys before roadside fuels work. I understand the Forest Service has acknowledged it didn't have time to fully survey the roads slated for fuels reduction, and is instead relying on sale layout staff and contractors to identify and protect any rare or sensitive plants during implementation. That's a conflict of interest, and it's backwards — surveys should happen before ground is disturbed, not during. I'd ask that no roadside fuels treatments proceed in forests over 80 years old until proper botanical surveys are completed.

The Road 4600 culvert. I've fished this drainage for years, and I'd ask the Forest Service to analyze a proposed action to replace the perched culvert on Road 4600 that's currently blocking fish from roughly 0.8 miles of habitat upstream. The Aquatic Conservation Strategy doesn't just call for maintaining connectivity — it calls for restoring it. A project of this scale, in this watershed, is the obvious place to do that work, and leaving it out feels like a missed opportunity rather than a neutral choice.

Thank you for considering these comments.