

18 June 2026

I am writing to comment on the Anvil Vegetation Management Project on Mt. Hood National Forest. My name is Jensen Sears, and I am a resident of Portland, Oregon. I care about the ecological health of Mt Hood National Forest and want to see this area support wildlife, recreation, and functioning ecosystem services. I also care about thorough, reasonable, and community-involved processes and decisions.

The reasoning, decisions, and process of the Anvil Vegetation Management Project are concerning. This **project does not warrant the use of the Emergency Action Determination (EAD)**, because there is not an urgent emergency and because the proposed actions are long-term management, not emergency actions. Commercial harvest is not permitted for the proposed actions under the Infrastructure Investment and Jobs Act (IIJA). **Commercial harvest needs to be removed from this project in accordance with the IIJA.** The Surveys for this project were cut short and were incomplete. **The incomplete-survey areas need to be specified and either properly surveyed by specialists or removed from the project area completely.** Finally, the Anvil Vegetation Management Project includes proposed commercial harvests after thinning. **Proposed commercial harvests need to be removed from the project, as they are only authorized under the IIJA for sanitation harvests.**

The EAD should not be used in the Anvil Vegetation Management Project because this area does not contain an immediate emergency. The threat that this project aims to address is primarily wildfire risk, but the preliminary assessment does not provide evidence that this is an immediate emergency and instead indicates that all threats to this area including drought, infestation, and fire are gradual, long-term processes. Is there an actual immediate emergency

or threat that the preliminary assessment failed to include and provide thorough assessment, definitions, and reasoning for?

The EAD should not be used for thinning within the Anvil Vegetation Management Project because thinning does not urgently address an emergency. Thinning as management is a long-term action plan, not an action that is necessary to immediately address an emergency. Long-term management is not an immediate emergency response. The use of the EAD, which is designed for urgent circumstances, for a project that focuses on long-term management is concerning and unfounded.

Areas of this project that were not fully surveyed need to be specified and properly surveyed by specialists or removed from the project. The areas of this project that were not properly surveyed for sensitive species should not have been included in the project area. How will this project protect sensitive species if there was not enough time to properly survey for them? The responsibility to identify sensitive species and protect them cannot be the responsibility of contractors and of those cutting these areas. This is a conflict of interest, and it would be disingenuous to propose this as a responsible course of action.

Commercial harvests for thinning are not permitted under the IIJA and need to be removed from the project plan. The IIJA authority states specifically that commercial harvest are only permitted for, “sanitation harvest of trees to control insects or disease, including trees already infested with insects or disease.” The Anvil Vegetation Management Project does not indicate a current infestation nor an urgent risk of infestation, and proposes commercial harvest after thinning, which is not permitted under the IIJA.

I appreciate that community feedback is being welcomed in this project, and I look forward to seeing how the Anvil Vegetation Management Project will change to reflect a proper process and ongoing community input. I would also like to see more efforts from the Forest Service to solicit input from surrounding tribes for land management—both in plan and in action.

Thank you,

Jensen Sears