



June 19, 2026

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

In Reply To: Anvil Vegetation Management Project Preliminary Assessment

Dear Mr. Monsanto:

American Forest Resource Council (AFRC) is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Mt. Hood National Forest, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of Oregon's forest sector employs approximately 61,000 Oregonians, with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

EMERGENCY SITUATION DETERMINATION

AFRC is pleased to see that the Clackamas River District (CRD) has been authorized to utilize the Emergency Situation Determination (ESD) under section 40807 of the Infrastructure Investment and Jobs ACT (IIJA) to implement this project. The Agency, as a whole, has often struggled to initiate and implement projects designed to restore or impart resilience in Western Forests at a pace and scale which reflects the need for treatment on-the-ground.

By utilizing this ESD and, correctly, identifying the need for treatment in this popular recreation area, we believe that the Forest is making progress towards common sense land management that the public widely supports. As a result of your effort, this area will become more resilient to natural disturbances, public roadways will become safer, future wildfires will be easier and safer to contain, and we hope that

some public trust in the Agency can be restored. **The Forest deserves credit for taking this approach, and we thank the Forest for utilizing this authority.**

PURPOSE AND NEED

AFRC believes that timber harvest is an integral component of forest restoration and fuels reduction in Oregon forests. We appreciate the Forest for including commercial timber harvest as a component of the Anvil VMP. We are concerned, however, that commercial harvest was listed as a *secondary objective* for this project. When the Northwest Forest Plan (NWFP) placed over 80% of the federal land base into reserves, where commercial timber can only be removed as a byproduct of treatments focused on restoration, the remaining Matrix LUA was assumed to be the only area where sustainable timber harvest is the primary objective. As a result, the management of these acres represents a critical component for purchasers throughout the NWFP area. The Anvil VMP project area overwhelmingly targets treatments within the Matrix LUA.

From AFRC's perspective, any project which proposes management in the Matrix LUA should establish within the purpose and need statement a *need* to provide forest products. Our members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. Furthermore, we firmly believe that the project's *primary objectives* to "improve forest health and vigor", "shift the structure and composition of forested stands towards desired conditions", "provide safer ingress and egress for firefighters", and to "reduce the risk of high-intensity wildfires" will require treatment across the entire diameter spectrum, regardless of the removed trees' commercial viability. **We urge the CRD to include "provide forest products" as a primary objective within the Purpose and Need statement for the Anvil VMP EA.** This may seem trivial, but we believe that including this provision as a primary objective for the project may help ease implementation obstacles later.

WET SEASON OPERATIONS

We appreciate your language in PDC A2, PDC A3, and PDC E1, which allows purchasers the opportunity to apply for wet season waivers to resume ground-based operations, including road maintenance and reconstruction, in the event that unusually dry conditions persist during the wet season.

We are similarly pleased with your language in PDC H4, which allows for haul during the wet season, provided roads are rocked to sufficient depth and strength to avoid rutting, runoff, and pooling. Proper road design and layout should pose little to no negative impacts on water quality or slope stability. Consistent and steady operation time throughout the year is important for our members not only to supply a steady source of timber for their mills, but also to keep their employees working. These two values are intangible and hard to quantify as dollar figures in a graph or table, but they are important factors to consider. The ability to yard and haul timber in the winter months will often make the difference between a sale selling and not. We thank the CRD for being proactive in this effort.

ROADSIDE FUELS TREATMENTS

We are disappointed that the entire proposed 406 acres of roadside fuels treatments will receive a strict diameter limit of 10 inches DBH. We understand the CRD's hesitancy to propose commercial

treatment in LSR or AWA LUAs that intersect with proposed fuel breaks. However, for the majority of proposed shaded fuel breaks that intersect previously-managed stands and/or Matrix LUA, this decision is concerning to us for a number of reasons.

First, it is not clear to us what rationale the CRD used to determine what intensity of management was necessary along these fuel breaks to create a resilient and fire-resistant stand condition. There is no discussion on desired relative density, crown continuity, inter-tree competition, or any other metric which would illustrate the effectiveness of proposed treatments. Instead, there is only a sweeping diameter cap of 10 inches in stands, with no stated reasoning. It's true that understory thinning will reduce the horizontal fuel profile within these fuel breaks. For fires originating from the roadway, this may help to minimize the likelihood of a fire quickly spreading into the crowns of adjacent overstory trees. But fuel breaks are not only meant to be effective at reducing the likelihood of conflagration at the point of ignition. Their effectiveness should also be measured in their ability to give firefighters an opportunity to control or suppress the volatility of an approaching crown fire.

Second, we worry that if a severe fire were to occur in this project area, and quickly overcame one of these fuel breaks, then that may undermine the perceived effectiveness of fuels reduction and tree thinning as a means of preventative forest maintenance. The public may view fuel breaks as ineffective when, in fact, the control lines were never adequately treated to begin with.

Finally, we are concerned with any project proposal which increases logging costs while also delivering less timber volume to local purchasers. As your Preliminary Assessment identifies, the majority of proposed fuel breaks will intersect with previously managed plantations and/or the Matrix LUA. There should be little, if any, concern for proposing treatment in stands that exhibit similar stocking and structure as stands proposed for commercial treatment elsewhere in the Anvil VMP project area.

Again, we agree that some form of fuels treatment is necessary along these proposed fuel breaks to prepare the landscape for the inevitable future wildfire. We also agree that many of these fuel breaks will intersect with stands that require only pre-commercial treatment in order to be meet desired stand condition. We only contend that, when determining management intensity along these fuel breaks, there should be more consideration than a single, arbitrary, one-size-fits-all diameter limit. **We urge the CRD to reconsider this approach and allow commercial removal within proposed roadside fuel treatments, wherever appropriate.**

ROAD DECOMMISSIONING

We appreciate language in the Anvil VMP Preliminary Assessment which indicates that only those temporary non-system roads within the project area will be proposed for decommissioning. The land base covered in the project area is to be managed for a variety of forest management objectives. Removal of adequate access to these lands would compromise the agency's ability to achieve these objectives.

QUARRY DEVELOPMENT

We are pleased to see the CRD include allowance for contractors to utilize existing Forest Service-owned rock pits to source suitable materials for road construction within the project area. Maintaining a nearby rock source will help the economic viability of future timber sales resulting from the project.

TETHERED ASSIST (TA) YARDING

We appreciate the CRD including tethered assist (TA) as a potential harvest system for slopes up to 60% in timber sale units in the Anvil VMP project. We also appreciate your language in PDC C9, which permits purchasers to apply for wet season waivers to utilize TA during the wet season, provided certain conditions are met. The technology associated with this equipment, and the availability of contractors who employ this technology, has grown significantly over the past several years. New machines are being built lighter with less impact on the ground that they operate on. A track-mounted loader, for example, would be tethered at the landing. This displaces the weight to the source of the tethering and reduces the psi generated by the tracked equipment. In other words, TA is proving itself, not only as a more economical and safe means of logging on steep slopes, but the system can be less impactful to soil resources when compared to conventional cable systems.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision-making process for the Anvil VMP project. Should you have any questions regarding the above comments, please contact me at 541-521-9143 or cbingaman@amforest.org.

Sincerely,



Corey Bingaman
Western Oregon Field Coordinator
American Forest Resource Council