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Organization:

Title:

Comments: I am writing to submit public comment on the Anvil Vegetation Management Project.

I am a frequent user of the forests within and adjacent to the project area. I have conducted volunteer field surveys within the planning area.

I have support for some aspects of this project as proposed. I also have some concerns. Finally, I have strong objections regarding the use of the Emergency Action Determination.

Areas of support:

I support the withdrawal of proposed treatment in mature forest stands and riparian areas that were included in the initial proposal.

I support the proposal to include extensive use of fire, through broadcast burning and pile burning.

I support the retention of large-diameter overstory trees in roadside fuels treatment and plantation thinning areas. Generally, I recognize that active management, including limited commercial harvest, is necessary and beneficial to restore forest health conditions under certain circumstances, such as departure from historic conditions due to past management practices and fire exclusion.

Concerns:

Comprehensive botanical surveys for rare and sensitive plants, and for non-native invasive plants, in roadside fuels treatment areas have not been conducted. These surveys must be completed before implementation of roadside fuels treatments, by agency staff or agency contractors.

The agency has not analyzed any action alternatives besides no-action.

The culvert at the Pot Creek crossing of Forest Road 4600 is perched, prohibiting fish passage, which conflicts with ACS Objective 2 specifically requires that agencies "maintain and restore watershed connectivity." The proposed actions fail to remedy this.

The Forest Service has not engaged in meaningful engagement with regional Tribal nations to develop the proposed project. Sending a letter to Tribal Chairs is inadequate and does not fulfill trust obligations to Tribes.

Objection to use of Emergency Action Determination:

Projects carried out under the authority of the Emergency Action Determination are not subject to objection under the pre-decisional review process. This limits meaningful public engagement. Public engagement is a fundamental right of our democracy. I object to the exclusion of opportunity to object.

The agency's Preliminary Assessment and specialist reports do not establish that all the proposed treatment units are experiencing conditions meeting the EAD criteria. The PA includes proposed treatments (Variable Density Thinning to improve forest health and provide timber) that are not Authorized Emergency Actions (under section 40807) on 2,053 acres.

Under the statute (Infrastructure Investment and Jobs Act or 'IIJA'), an "emergency situation" means a situation

for which immediate implementation of one or more Authorized Emergency Actions (AEA) is necessary to achieve relief from (1) relief from hazards threatening human health and safety, or (2) mitigation to threats to natural resources.

The Silvicultural report estimates that the Anvil Project would be sold in 2030, which is not immediate. The Silviculture report analyzes the benefits of the proposed VDT in short-term, mid-term, and long-term projections, in the years 2038, 2076, and 2136, respectively. None of those years are in the immediate future.

None of the stands identified for treatment are identified as currently experiencing high mortality due to insects or disease. The Forest Health Protection specialist report states that a number of insect and disease species are likely present, and that "Currently, drought related mortality is evident in the western hemlock and Pacific silver fir and is likely the most damaging agent to consider in these stands."

Therefore, the decision to pursue Emergency Action Determination for the Anvil Project is not warranted or authorized under the law. As written, the PA is a mash-up of authorized conditions and actions (roadside fuels treatment), and other conditions and actions which do not meet the EAD criteria. Lumping these together under EAD serves only to limit analysis and public engagement.

As I stated at the beginning of this letter, I am in general support of many (not all) aspects of this proposal. However, the application of the EAD as a blanket over the whole project undermines the legitimacy of the whole project.

I urge the Forest Service to revise the Anvil Vegetation Management Project. One possible way to do this is to withdraw the proposed actions (VDT for forest health and timber production) that do not meet EAD criteria, and to repackage that as a separate project, while proceeding with roadside hazard and fuels treatments under the EAD.

I am confident that the highly skilled, experienced, and dedicated staff of Mt Hood National Forest can revise this project, meet all necessary obligations, and maintain robust public engagement.

Respectfully,
Mia Pisano