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Comments: The first time I camped on Mt Hood was a trip 50 years ago with friends in high school. We drove up in the evening, slept by the side of the road and got up before daylight in order to hike to timberline before the day got hot. In the intervening years I have hiked, snowshoed, foraged for mushrooms, camped, swam, and spent many lovely days at a Forest Service cabin on the Zigzag River. I have backpacked the piece of the PCT that runs alongside Timothy Lake and slept on its shores. I have always felt blessed to have the forests and waterways of Mt Hood so close to my home in Portland.

The temperature mature and old growth forests of the Pacific Northwest are, acre for acre, among the best in the world for sequestering and storing carbon. At this time as we are already facing climate chaos our forests are by far the most effective technology we have for creating climate resilience and decisions about stewardship should be made with this fact at top of mind.

I have concerns about the Mt Hood Forest Service Emergency Action Determination for the Anvil Project.

From Bark for Mt Hood:

Bark rejects the need for Emergency Action and does not support the use of Section 40807 of the Infrastructure Investment and Jobs Act (IIJA). The Mt. Hood Forest Service has cited two primary reasons for applying the Emergency Action Determination to the Anvil project: uncharacteristically severe wildfires and insect and disease outbreaks. But neither of these reasons hold up under closer inspection.

The Anvil project area is within moist, western Cascades Douglas-fir and western hemlock dominated forests. The Anvil Public Engagement Letter states: "Historically, frequent low- to mixed-severity fires maintained open forest structure and species composition in this area." This statement is incorrect. While low to mixed severity fires played an important role in creating and maintaining structural diversity and species composition, high severity fires did as well. "Fire history studies and observations of early 20th century fires indicate that large, infrequent high-severity fires are characteristic of historical fire regimes in mountainous areas of the westside".

Paper cited: Cascadia Burning: The historic, but not historically unprecedented, 2020 wildfires in the Pacific Northwest, USA - Reilly - 2022 - Ecosphere - Wiley Online Library

As outlined above, Secretary Rollins's Memorandum 1078-006 states uncharacteristically severe wildfires as one of the reasons the Emergency Action Determination is warranted and needed. The Secretary also claims that "too little active management" has compounded the issue. In the Anvil project area, we reject this reasoning. As you are well aware, the Clackamas River Ranger District was significantly impacted by the Riverside Fire in 2020. Though there is no denying the significant impacts of this fire, "Early records and 20th-century maps of burned areas indicate that the 2020 fires were not unprecedented in size and severity, and either burned within, or in close proximity to, areas that burned in large fires following European colonization." However, to explore the argument that Emergency Actions are warranted to prevent uncharacteristic fires in the Anvil project area, let us assume that the 2020 Riverside Fire was uncharacteristically severe. Even then, the actions proposed by the Anvil project would do nothing to prevent a similar fire in the future. "The influence of forest management on fire severity was minimal and variation in forest structure or fuels played a relatively little role. These results provide little evidence to support the use of fuel treatments to mitigate fire severity under extreme fire weather conditions on the westside". Further, "...our results suggest that manipulation of stand structure is unlikely to mitigate fire effects in wind-driven fires on the westside given the minimal differences in burn severity among stand structure classes".

Finally, commercial thinning of plantations is not one of the authorized emergency actions to respond to emergency situations, yet the Forest Service is still applying the EAD broadly to the entire project.

I worry that the misapplication of emergency status in the Anvil Project will lead to the loss of invaluable forest land.