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Comments: Thank you to USFS staff for receiving public comments on the Preliminary Assessment of the Anvil Vegetation Management Project (VMP) and the Emergency Action Determination (EAD) thereof, the latter under authorization of USDA Secretarial Memo 1078-006 titled, "Increasing Timber Production and Designating an Emergency Situation on National Forest System Lands."

I am writing as someone who has worked over 13 years in local government and conservation, and as a Portland resident who has valued and enjoyed the beautiful forests of Mt. Hood for the last 20, and understands their deep value environmentally, culturally, recreationally, as critical habitat and corridor space for wildlife, and economically. I am writing also as an individual citizen and not in any official work capacity. I also have helped extensively survey several areas in the Anvil MVP in a volunteer capacity, and am familiar with on-the-ground forest conditions in the proposed areas.

I write because I have serious reservations about and objections to the proposed Anvil VMP, and it does not seem legal or actionable under the EAD in many ways. I am left uncertain what mitigation the Forest Service hopes to achieve here, or how the proposed actions "achieve relief from hazards to human health and threats to natural resources."

First and foremost, it seems there is no defined "emergency situation" that warrants this determination in the first place. The well-defined statutes require a situation that achieves relief from "hazards threatening human health and safety, or (2) mitigation to threats to natural resources". 16 U.S.C. § 6592c(b)(2). In order to even invoke the authority, the agency must explain what the emergency is and why it requires immediate implementation of one or more authorized emergency actions, and why those actions are necessary. Neither the Preliminary Analysis nor the associated specialist reports do this at all.

Nor are there any sudden or unforeseen conditions. According to reports from the agency: there is no insect or disease outbreak in the project area. There are no sudden changes according to the fuels report either, just gradual changes, and nothing warranting emergency action. It is my understanding also that botanical surveys in the area were not completed either, and I would ask how the roadside fuels reduction treatments could even be applied given this.

Finally, variable density thinning is not even an authorized emergency action, and the 2,053 acres slated to be thinned this way would not be a legal application of the EAD even if there -were- a determined emergency situation, which there apparently is not.

I urge the USFS to completely withdraw the EAD and reevaluate how to best manage the Anvil lots based on actual on-the-ground conditions and in accordance with all laws and statutes, and based on information on the region developed by surveying and reporting. I believe this area can be managed well and responsibly in a way that does mitigate risks and dangers, but that what is being presented here does not achieve that or demonstrate the proposed treatments' necessity.

Thank you.