Data Submitted (UTC 11): 6/12/2026 6:10:27 AM
First name: Susan
Last name: Mates
Organization:
Title:
Comments: I feel so lucky to live near a special area like Mt. Hood. It has become a place not just for recreation, but for solace and rejuvenation. As so much habitat is disappearing elsewhere, these protected places become all the more precious for me-and the wildlife it contains.

As a founding member of Treekeepers of Washington County, I am working to protect and advocate for trees here in the Metro area, but the knowledge I have gained through that makes me all the more appreciative of all that Mt Hood offers. And how ephemeral it can be.

I am alarmed by the intent of your "Preliminary Assessment" and associated documentation in regards to the Anvil Vegetation Management project on the Clackamas River Ranger District. The reasons for invoking an Emergency Action Determination (namely uncharacteristically severe wildfires and insect and disease outbreaks) do not seem to bear up under scrutiny.

There does not seem to be an adequate explanation for what hazards threatening human health and safety you are addressing. What are they? How would these mitigations achieve your goals?

There have been many scientific studies that reveal that large, infrequent high-severity? fires have crossed this region repeatedly throughout history, even here on the wetter west side of the Cascades.

They also show that our forests are remarkably resilient. Indeed, there seems to be little evidence that supports the practice of using fuel treatments to prevent small fires from becoming large ones. What has really changed has been the human effects on climate. Fuels have very little to do with the size of fires. It's fire weather that drives them, and the expanding pressures on the RUI.

In fact, recent studies indicate that older, closed-canopy forests with higher biomass are more fire resistant than young plantations with smaller trees under more moderate weather conditions (Lesmeister et al., 2019; Lesmeister et al., 2021; Zald & Dunn, 2018).

Your proposal for commercial thinning/logging in historic clearcuts/plantations under 80 years old, reducing roadside fuels, using prescribed fires, and constructing roads seem to be a waste of taxpayer resources at best, and misguided forest management practices at worst. An emerging theme seems to be that our forests may actually benefit from minimal management interference.

It would seem to be much more useful to promote resilience and protect communities on the westside by utilizing homeowner-focused and community-level strategies. We need more investment in the RUI to implement Firewise USA principles around structures and other techniques that enhance community preparedness.

You state that, "We were unable to thoroughly survey roads planned for fuels reduction (i.e., shaded fuel break) treatment due to insufficient time." (Botany report p. 6) It would seem imperative that botanical surveys be completed before roadside fuels treatments are done.

In addition, it seems that The Road 4600 perched culvert is blocking fish from accessing nearly a mile of critical habitat, but tI don't see any plans for you to address it. I am hoping that you will analyze a proposed action to replace this culvert to allow listed fish species to access critical habitat.

Furthermore, there are a number of roads listed in the transportation report. Please consider closing or

decommissioning these.

I am counting on you to use the best available ecological science as the basis for your decisions to create the most resilient forests.

Thank you for considering my comments.

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Resources

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