

July 27, 2011

To: Pilot Joe Demonstration Project  
Stephanie Kelleher  
Ashland Resource Center  
3040 Biddle Road  
Medford, OR 97504



## PILOT JOE DEMONSTRATION PROJECT EA COMMENTS

### **I support Alt. 1 – No Action**

#### **Comments on Alt. 2:**

Alt. 2 requires perpetual study and continuance of the Demonstration Project. If chosen (page 2-19 EA), future work (timber sales) would build on the Pilot Joe Project. I am opposed to the open ended continuance of the Alt. 2 Ecosystem Restoration because the underlying O&C lands would not be primarily managed for commercial timber sale production as required by the 1937 McNary Act. The costs of extensive monitoring and preservation of hardwoods would not be economically beneficial to the O&C counties nor to the federal government.

Alt. 2 has an incomplete financial analysis for future required monitoring. There is no evidence in the EA of any estimate of future costs of continuing Ecosystem Restoration projects, nor of the study projects. There is no evidence in the EA of cost/benefit ratios for the future. Therefore, the project analysis is incomplete.

As an aside, this is no time, during America's debt crisis, to be adding more expenses to the federal government.

#### **Comments on Restoration:**

Throughout the EA there are priority references to "modifying the ecosystem" and "restoration". Following the mention of ecosystem come the mentions of social and economic concerns, almost as afterthoughts. Again the McNary Act must be followed and highest and best timber management and sales must be implemented as a priority.

**Conclusion:**

I support the legal mandate of the McNary Act to manage the O&C lands for maximum commercial production of timber and sales to benefit the O&C counties and the federal government.

I oppose the experimental treatment and study of the O&C Lands for Ecosystem Restoration back to conditions at some time in our historic past. The lands need to be currently managed for the highest and best qualities for commercial timber production and sales as per the McNary Act.

I support the management for commercial timber harvesting as well as fuels reduction, both of which, by the way, are not precluded with the choice of Alt. 1. (EA page 2-1).

**Therefore:**

**I support Alt. 1 – No Action.**

Thank you for this opportunity to comment.

Yours truly,

[Redacted signature]

[Redacted address]

[Redacted footer]