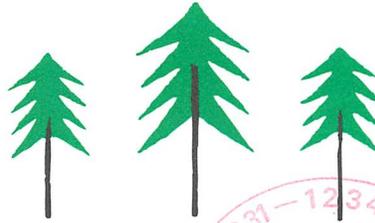


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Stephanie Kelleher
Middle Applegate Pilot Project
Medford District BLM
3040 Biddle Road
Medford, Or 97504

RE: PILOT JOE ENVIRONMENTAL ASSESSMENT

Dear Ms. Kelleher

As you know, the Association of O&C Counties is made up of counties in Western Oregon within which lie a special category of BLM-managed timberlands known as the Oregon and California Grant Lands ("O&C Lands"), as well as other federal timberlands. The O&C Lands are dedicated by federal law to the production of timber for the purpose of supporting local communities. The purpose of the Association of O&C Counties is to cooperate with the BLM in the development of policies for the management of these lands and to work with members of the Oregon Congressional Delegation in matters concerning national legislation and administration of federal laws affecting the O&C Lands. The statutory authority for the management of these lands is the O&C Act of 1937 and Sec 701(b) of FLPMA.

In response to your scoping notice dated April 8, 2011, please incorporate the following comments into the Pilot Joe environmental assessment:

1. Include as additional pilot project objectives: Meeting the sustained yield requirements of the O&C Act, providing jobs to promote economic growth in communities, and generating revenues for the benefit of O&C Counties.
2. Develop and analyze a proposed action or alternative in the EA that meets the management direction in the Western Oregon Plan Revision (WOPR) for dry forests in the Medford District. The Pilot Joe timber sale should meet the management objectives for the Uneven-Age Timber Management Area land use allocation. This includes: 1) Managing the forest to achieve continuous timber production that could be sustained through a balance of growth and harvest; 2) meeting the ten year allowable sale

quantity of 222 mmbf for this land use allocation; and 3) promoting development of fire resistant and fire resilient forests.

3. Develop and analyze a proposed action or alternative in the EA that includes treatments (including commercial timber harvest) in riparian reserves or riparian management areas as described in WOPR. Consult with National Marine Fisheries about ESA fisheries issues.
4. The Pilot Joe Pilot Project is located within the Applegate Adaptive Management Area. The proposed action and all EA alternatives should include practices that will test and analyze a variety of technical and social approaches to achieving ecological, economic and social objectives for sustainable forests and communities.
5. Replicate and analyze the ecological forest management principles applied to this project for all dry forest O&C Lands (not just Matrix or Uneven-Age land use allocations) within the boundaries of the Medford District.

If you have any questions please feel free to contact me at 541-412-1624, rocky@blupac.com , or Van Manning at 253-549-0074, vanbonmanning@comcast.net .

Sincerely,

Rocky McVay
Executive Director
Association of O&C Counties



Cc: Ed Shepard, State Director
Dayne Baron, Medford District Manager