

Southern Oregon Resource Alliance

PO Box 2335, Grants Pass, OR 97528

July 27, 2011

Pilot Joe Demonstration Project
Stephanie Kelleher
Ashland Resource Area
3040 Biddle Road
Medford, OR 97504

RE: PILOT JOE DEMONSTRATION OF THE FRANKLIN-JOHNSON RESTORATION
PLAN FOR THE BLM O&C LANDS OF SOUTHWEST OREGON

Dear Ms. Kelleher:

Southern Oregon Resource Alliance is an association of businesses and individuals concerned about the economic utilization of natural resources in southern Oregon. We have been active since the late 1970s. Our members have participated in the various presentations offered by the BLM regarding Pilot Joe.

SORA objects that the Pilot Joe Project is an unlawful operation, undertaken in an unlawful manner to accomplish an unlawful goal.

The stated purpose of the project is the demonstration of the newly adopted Restoration Principles for the BLM O&C Forests in Southwest Oregon developed by Drs. Franklin and Johnson. SORA suggests that the adoption of a management plan can only be lawfully undertaken after adequate public notice, commentary, hearing and consideration of alternatives. The Franklin Johnson plan was only published in November of 2010. The announcement of the Middle Applegate Watershed Pilot Project demonstration of the newly adopted plan for the O&C followed in February of 2011. Between the publication of the plan and its adoption, there was no scoping and consideration effort comparable to the consideration given the adoption of the Western Oregon Plan Revision which has been summarily cancelled by the Secretary of the Interior. Simply the adoption of the underlying Franklin-Johnson plan as a replacement was not in compliance with applicable CFRs.

SORA notes that the Franklin-Johnson Plan appeared in response to the final report of the Western Oregon Task Force produced in July of 2010 and provides a mantra of scientific justification for the plan recommended by the task force. This task force is represented as being a collaboration between industry and environmentalists to end years of litigation. SORA notes that historically, landed timber interests and environmentalists have shared the same goals. Neither favors public utilization of the timber resources on the BLM, one for purposes of preservation of aesthetic values and one for preservation of market control. Their "collaboration" does not serve the public interest of additional production and additional supply.

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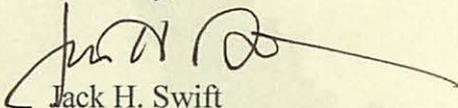
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Again without public notice, the implementation of the Franklin-Johnson Plan was announced in Washington in December of 2010, less than a month after its publication.

The management of these O&C lands has been established by statute to be “for permanent forest production, and the timber thereon shall be sold, cut, and removed in conformity with the principal of sustained yield for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries, and providing recreational facilities.” The adopted plan being demonstrated does not do that.

We object to any implementation of the replacement plan of management for the O&C lands, including pilot demonstration projects without compliance with the lawfully established procedures.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jack H. Swift', with a long horizontal flourish extending to the right.

Jack H. Swift
Vice-Chairman and Legal Counsel