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February 28, 2002

Via U.S Mail

Mr. John Greis
Dr. David Wear
SFRA Program Managers
USDA Forest Service
Southern Region
1720 Peachtree Road, NW
Atlanta, GA 30367

Re: Comments on the draft Southern Forest Resource Assessment

Gentlemen:

This firm represents the Tennessee Paper Council, which is an organization of companies engaged in the manufacture of paper products and the management of forest land in Tennessee. We have reviewed the comments on the draft Southern Forest Resources Assessment ("SFRA") prepared by the American Forest & Paper Association. The Tennessee Paper Council concurs with and supports these comments of the American Forest & Paper Association. Specifically, but without limitation, the Tennessee Paper Council notes the following comments submitted by American Forest & Paper Association:

Executive Summary:

- The SFRA clearly demonstrates that urban sprawl is the most substantial threat to the South's forests, but that strong timber markets encourage landowners to keep land forested.
- While the amount of land used for urban development has increased by 45% between 1982 and 1997, the area in forest cover remained stable (even increasing slightly). And while demand on southern forests has grown to represent over 60% of the nation's total timber production, forest inventories have nevertheless continued to increase.

TERRA

- The report should note that intensively-managed stands could and often do contribute significantly to biological diversity.
- This chapter lists numerous forest management practices that negatively impact wildlife (i.e., pesticides, plantations, heavy site prep, clearcutting, etc.) although little or no data are presented to substantiate claims. In the same token, there should be specific mention of the value of managed forests for wildlife and biodiversity.
- Water quality issues were listed as potential problems for many species; but no mention was made to the rise in Best Management Practices compliance across the south. The increasing

use of Best Management Practices in virtually every state in the south is having a tremendous impact on improving water quality and enhancing habitat conditions and biodiversity.

SOCIO

- The study places excessive emphasis on government subsidies role in the productive state of the southern forest. At best, according to the numbers in the report only 1.5% of landowners are even participating in any type of direct government subsidies. Conversely, this means that 98.5% of the landowners are responding to marketing signals and other management objectives.

TIMBR

- The chapter is well balanced. However, the point could be made that the reason industry cuts trees is to satisfy consumer demand and not just to satisfy an industry's gluttonous appetite for wood fiber as is often implied by environmentalists.

HLTH

- Urban growth is the major threat to future forest productivity in the South. One likely result of urban sprawl, therefore, is an increase in ozone formation in formerly rural forests.

AQUA

- The significant efforts most states are devoting to BMP education programs are not discussed in much detail.
- The reports from individual states on monitoring and addressing "bad actors" is an indication that most of the Southern states are proactive in taking measures to improve BMP implementation, effectively using the Section 319 funds for their monitoring programs.

Sincerely,


J. Andrew Goddard