

INTERNATIONAL  PAPER

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USDA Forest Service
Southern Region
1720 Peachtree Road, NW
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attn: John Greis

Dear Mr. Greis,

Thank you for the opportunity to provide comments on the "Southern Forest Resource Assessment" draft report. International Paper is a worldwide producer of printing papers, packaging, and forest products. Headquartered in Stamford, Connecticut, the company is the largest private landowner in the United States today, owning and managing approximately 11 million acres of forests primarily in the southern and eastern U.S. Additionally, International Paper procures wood fiber and timber from thousands of private non-industrial landowners for our numerous mill and manufacturing facilities. Clearly, the health, productivity, and sustainability of the southern forest are critical to our company's future. We commend the interagency team for leading the most comprehensive assessment of southern forests ever undertaken.

As a member company of the American Forest & Paper Association, we support the detailed comments being provided under separate cover on behalf of its 200+ member companies and affiliate associations. However, we want to emphasize some points of particular importance to our company.

We strongly support the process that was used in developing the draft report to assure that it remained a science-based document without undue influence of interest groups advocating their specific agendas. Having each chapter and the summary anonymously reviewed by a minimum of three technical experts prior to the draft report's release helped to ensure technical rigor of the document. The broad involvement of over 100 technical experts in reviewing the various chapters assured that the best available scientific expertise was tapped during the review process. Scientific credibility was further enhanced by drawing reviewers from state and federal agencies, academia, conservation organizations, forest industry and the general public.

We concur with key conclusions of the draft report including the following:

- The southern forest continues to be a sustainable, plentiful, resilient and healthy and renewable resource. This is true despite historical widespread conversions to non-forested uses and current pressures, especially from human population growth and urbanization.

- While demand on southern forests continues to grow, forest inventories are keeping pace and will continue to do so in the future, as long as modern forest technology and active management remains unfettered, private landowners are provided incentives to keep their lands forested, and some currently non-forested land is converted to healthy, working forests.
- While southern forests are generally in excellent condition from an ecological, economic and social perspective, stakeholders need to collaboratively address conservation of some at-risk forest communities such as Atlantic white cedar, longleaf pine, bottomland forest, wetlands, barrens and spruce-fir forests.
- Solutions to at-risk forest issues should recognize the contribution that managed forests make in providing much of the same biodiversity found in these forest communities. Even intensively managed forests can and do provide multiple ecological, social and economic benefits. Solutions should also recognize the current economic pressures on private landowners and use incentive-based, collaborative approaches to assure such ownerships remain in forest cover.

We also offer the following specific comments related to individual chapters in the report for your consideration:

Terra 1: Most southern biodiversity is secure, despite hundreds of years of intensive and widespread human land use for multiple purposes. Peer-reviewed scientific research supports the fact that industrially managed forests make significant contributions to biodiversity conservation. Many species associated with at-risk forest communities (e.g., red-cockaded woodpecker) can thrive in other forest communities (such as loblolly plantations) depending on forest stand structure and availability of specific microhabitat elements.

Terra 2: Contrary to oft-stated opinions of some groups, southern forests have a long history of management and conversion among different usages, pre-dating European settlement.

Terra 4: This chapter needs revision throughout with special attention to including only facts that can be backed up with peer-reviewed, current scientific studies. There is ample scientific evidence to show that managed forests and plantations can provide much of the same biodiversity, and sometimes even more biodiversity, than "natural" forests depending upon forest structure.

Terra 5: The chapter needs revision so that only species included in the scope of the study are used for trend analysis included in the document. The chapter should also explicitly recognize the contributions made to biodiversity conservation by industrial forests through both standard management, as well as special management provisions incorporated into federally-approved habitat conservation plans (e.g., Red Hills salamander and red-cockaded woodpecker HCPs that International Paper has in place). The chapter should be edited with special attention to including only facts that can be backed up with peer-reviewed, current scientific studies.

Socio 2: The survey on which the chapter's findings are based was poorly designed and narrowly focused. As a result, the conclusions drawn are severely biased. Various uses of forests are cast as mutually exclusive and complimentary relationships are ignored, although forests can serve multiple purposes simultaneously. This chapter is largely based on public opinion research. The survey development and execution in public opinion research is analogous to study plan design and implementation in forestry research. Valid results are achievable only if the research survey and the study plan are properly designed. The conclusions noted in this chapter are not credible because of inadequacies in the survey design.

Socio 5: The forest products industry contributes significantly to outdoor recreation and this should be acknowledged. A broader discussion of public access programs, fishing, hunting leases, etc. available through state wildlife commissions, is also warranted.

Socio 6: The chapter should be edited with special attention to including only facts that can be backed up with peer-reviewed current scientific studies. The comments made above on Socio 5 chapter are appropriate here as well.

Socio 7: The chapter should better recognize the forest product industry's contribution to the local tax base which helps lead to a better quality of life for many local communities.

Health 2: The chapter does not acknowledge the negative effects of passive (or total lack of) management of public lands on the forests of adjoining landowners.

Aqua 2: This chapter should better explain how the apparent loss of wetland habitats under the various categories is, in part, a function of natural succession.

Aqua 3: Acknowledgment should be included that the miles of stream impaired by forest practices is extremely small relative to other practices. This fact has been repeatedly documented by the U.S. Environmental Protection Agency.

Aqua 4: Sustainable Forestry Initiative program requirements on implementation of best management practices and logger training have contributed broadly to the overall use and effectiveness of BMPs throughout the region. This is a significant fact that should be acknowledged in the report.

Aqua 5: Comments on the Aqua 4 chapter are appropriate here as well, since effective implementation of BMP's is a key component in protection of aquatic species of concern.

If you need further information regarding these comments, please do not hesitate to contact me. Thank again for the opportunity to provide input on the draft report.

Sincerely,



Sharon G. Haines