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# Forestry

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March 1, 2002

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

Dear John and Dave:

On behalf of the 2,700 members of the North Carolina Forestry Association, I commend you for the work done on producing the Southern Forest Resource Assessment (SFRA). The forest products industry, private forest landowners and forest managers as well as consumers share a keen interest and stake in the sustainability of southern forests. We believe the results of this work provide the scientific basis necessary for developing sound policies and programs aimed at forest sustainability. The agency should be commended for its leadership in producing this landmark regional environmental study.

As Team Leaders for the project, you both did an excellent job and successfully and impartially organized and managed the diverse group of researchers and issues addressed by the Assessment. All interested parties had the opportunity to identify and comment on important issues. Stakeholders were kept well informed of the Assessment's status through the SFRA website and progress meetings. Overall, the SFRA is a milestone in the long and storied history of research on southern forests and significantly contributes to our understanding of forest conditions and trends in the region.

We are aware of and generally agree with the detailed comments submitted by the American Forest and Paper Association (AFPA). We encourage you to examine and address these comments. In particular, we agree that the TERRA-4, TERRA-5, SOCIO-6, and AQUA-2 chapters overlooked important information and/or contain sufficient inaccuracies to warrant more thorough technical editing and review.

Finally, a note on additional research highlighted in the SFRA chapters. While many of the suggested areas for more intensive research are admirable, we urge the agency to establish priorities as part of its regular research program rather than undertake any new initiatives directly based on this Assessment. The SFRA is a comprehensive look at southern forests on a regional scale and deals adequately with most of the sustainability issues of interest and concern. The Forest Service is contemplating "small area assessments" as a subsequent task. We do not believe that these small area assessments will produce significant new insights beyond the findings of the SFRA. In fact, such a narrow focus would likely produce misleading findings. We have heard that parts of North Carolina are being considered for such a study. We do not support this and note that NC State University and Duke completed a similar 2-year study in 2000 which essentially confirms the findings of the SFRA. Nothing more is needed or warranted. In fact, the agency has already encountered substantial controversy in attempting to identify geographical areas for small area assessments, suggesting that any such studies might be compromised by a high risk of political influence and bias. We strongly believe that the agency should instead focus its attention and limited resources on improving and expanding data collection efforts such as the annualized FIA system.

Again, we appreciate this opportunity to offer comments on the SFRA and look forward to working with you in any way that can be helpful as completion of this project nears.

Sincerely,



Robert W. Slocum, Jr.  
Executive Vice President

Cc: NCFE Executive Committee  
NCFE Board of Directors  
NCFE Forest Management and Environment Committee