



FLORIDA FORESTRY ASSOCIATION

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***Promoting the
responsible and
sustainable use of
Florida's forest
resources
since 1923.***

August 12, 2010

Scott R. Koons, Executive Director
North Central Florida RPC
2009 NW 67th Place
Gainesville, FL 32653-1603

RE: Proposed Policy 4.1.6.

Dear Mr. Koons:

The following comments related to proposed policy 4.1.6 (biomass harvesting) are offered on behalf of the Florida Forestry Association. Our Association currently represents approximately 1600 members of Florida's forestry community, ranging from owners of small tracts of forested lands to the largest forest products companies and many others involved in the forestry profession.

Our recommendation is that proposed policy 4.1.6 **not be adopted**. We have several reasons for making this recommendation:

- The proposal is very open-ended and raises many important and troubling questions, such as: 1) Who would set the appropriate levels of biomass harvesting? 2) How will these levels be determined? 3) How would adverse impacts be measured and by whom?
- The term "*limit*", though central to this policy, is very vague and undefined (and therefore threatening). It connotes anything from a complete prohibition, to some unknown level of acceptable harvesting.
- We believe free market forces (supply and demand) are the best regulators of appropriate harvest levels.
- Any artificial limitations on timber harvest will only serve to threaten the forest resource in the region since it will discourage reforestation, which is absolutely essential for a sustainable resource.

If the RPC is to adopt a policy related to biomass harvesting, we believe the following alternative policy would better serve the region:

- **Policy – The North Central Florida RPC will encourage the sustainability of forests identified as "Natural Resources of Regional Significance" by fostering an economic climate conducive to the reforestation of harvested forestlands.**

In addition, it is our belief that the forests in the North Central Florida RPC region, including those designated as Natural Resources of Regional Significance, are already receiving a high level of protection through the application of Silviculture BMPs (of the Florida Department of Agriculture & Consumer Services, Division of Forestry). This is addressed in your current policy plan as follows:

“Policy 4.1.1. Ensure that local government comprehensive plans and Developments of Regional Impact include provisions which encourage the use of silvicultural best management practices for silviculture uses within Natural Resources of Regional Significance.”

In summary, while we oppose the adoption of proposed policy 4.1.6, we are ourselves are very interested in assuring resource sustainability. We just believe there are far more effective and efficient ways for that to be achieved.

Thank you for the opportunity to provide these comments, and we plan to have a representative present during your committee meeting of August 26 where this issue will be further discussed.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Doran". The signature is fluid and cursive, with a large initial "J" and "D".

Jeff Doran, Executive Vice President
Florida Forestry Association