

Dear Mr. Cordts: I was not able to attend the public meeting on "Genetically Engineered Forest and Fruit Trees" on July 8-9, however I would like to register my opinion on regulation of transgenic trees.

Transgenic technology is a tremendous opportunity to enhance productivity per unit land area. As a Florida resident, I see the dramatic impacts of urbanization on taking agricultural and forest land out of production. The most ecologically and environmentally sound way to meet the growing needs of society for wood products, is genetic improvement. Because transgenic technology accelerates the pace of genetic improvement, it is a key part of what we need to do: grow more wood on fewer acres.

I am concerned that "over-regulating" the commercialization of transgenic trees will effectively kill the technology by driving up costs. No one will make and use transgenic trees if the cost is prohibitively expensive due to elaborate requirements for government approval. So, philosophically I would like to see potential risks of transgenic trees evaluated on an individual trait and species basis. Required measurements should be scientifically justifiable and reasonable, achievable, and practical.

Too much good can come from transgenics in forestry, to allow this technology to be stopped dead in its tracks by over-regulation. The southeastern region enjoys a long history of tree improvement, plantations, and intensive production forestry. In fact, the southeast has become the nation's woodbasket in part due to a reduction in old growth timber harvests in the Pacific Northwest. In fact, this is perhaps as it should be - we should harvest wood from plantations to protect certain natural areas. But competition from South America threatens jobs in the region as well as the industry itself. Transgenic technology is the next logical step in our long history of tree improvement, and I hope that the commercialization of transgenic trees is facilitated through a scientifically reasonable process.

Thank you for an opportunity to comment on this important process.

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