

To: The Maine Legislative Agriculture, Conservation, and Forestry Committee

American Forest Management (AFM) manages over 970,000 acres of forestland for BBC Land, LLC (BBC) in Maine creating a multitude of jobs across the state. AFM implements a variety of silvicultural tools to properly manage this forestland including the use of clearcutting and planting trees to increase the productivity of the forest. I am writing to express the opposition of BBC to LD 125.

Some of the reasons that passing proposed legislation LD 125 will harm the forest products industry are:

- Banning aerial applications of herbicides shuts down tree planting on Maine's commercial forestlands and eliminates a management tool for foresters in natural regeneration management. The growing challenge to protect trees from invasive species is also threatened by this ban.
- This practice has been a proven and safe silvicultural and agricultural tool for decades, similar to thinning plants in your garden. Forest sites are treated once or at most twice over a 40- to 80-year crop rotation.
- The use of herbicides for forestry is regulated by the EPA and Maine DEP, including rates of application and allowed application sites. The effects of glyphosate have been extensively studied by the EPA and federal agencies and it is considered safe. The outright ban on all synthetic herbicides eliminates any options because there are no organic treatment options.
- The Maine Board of Pesticide Control (BPC) has the authority to regulate pesticides in Maine. The BPC has expertise in pesticides, investigatory staff, and civil penalty authority for misapplications. At the request of the 129<sup>th</sup> Legislature, the BPC authorized an independent assessment by SCS Global Services of conformance to State of Maine pesticide use regulations by industrial forest management companies engaged in aerial application of herbicides on forestland. SCS reported: "At bottom line, no evidence was gathered during the course of the verification audit to contradict the following overall conclusion: The State of Maine regulatory framework, within which aerial application of herbicides in forest operations takes place, is functioning as designed,"
- It would be a mistake to take away this essential tool at a time when Maine's forest products industry is rebounding. The wood that supplies our mills today is a result of a variety of silvicultural practices used by professional foresters in the past, we need every tool at our disposal to grow the forests of the future, this bill works against that principle.

I urge you to not pass legislation that will take away this very important and safe silvicultural tool from the forest products industry.



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