

Commissioner Amanda Beal
Maine Department of Agriculture, Conservation and Forestry
28 State House Station
Augusta, ME 04333

Dear Commissioner Beal,

I am writing to respectfully encourage the Department to examine whether Maine's current forestry policies place too heavy a reliance on herbicide-assisted regeneration and whether a greater emphasis on alternative silvicultural methods could strengthen both forest productivity and ecological resilience across the state's working forests.

Herbicide use has become a common tool in regenerating forests following clearcut harvests, particularly where the objective is to suppress hardwood competition and promote softwood species for fiber production. While this approach can simplify regeneration and reduce short-term vegetation competition, a growing body of research from Maine, Canada, and other northern forest regions suggests that productive forests do not require extensive herbicide use to remain economically viable. In fact, many silvicultural systems have demonstrated that maintaining mixed-species forests can sustain strong timber yields while also supporting broader ecosystem health.

In Canada, Quebec eliminated herbicide use on public forest lands in 2001 and has since relied primarily on mechanical release treatments, thinning, and other integrated vegetation management approaches. Forestry operations there continue to produce substantial timber volumes while maintaining mixedwood forest structures. This experience demonstrates that productive forestry can be sustained without heavy reliance on chemical vegetation control when silvicultural systems are designed to work with natural forest succession rather than suppress it.

Research across North America has also shown that mixed-species forests frequently perform as well as or better than single-species plantations over time. Mixedwood stands often demonstrate greater overall productivity, improved resistance to pests and climate stress, and more stable long-term yields compared to simplified monoculture systems. Studies from the University of Maine and the U.S. Forest Service have similarly documented that partial harvest systems and mixedwood management can successfully guide regeneration across multiple tree species while maintaining stand productivity.

Several practical alternatives exist that allow forest managers to control competition and guide regeneration without widespread herbicide application. Mechanical release and precommercial thinning can selectively reduce competing vegetation while maintaining species diversity within regenerating stands. Shelterwood systems, group-selection harvests, and other partial harvest approaches allow foresters to influence stand composition while preserving structural complexity. These methods may require more planning and labor than herbicide-based release treatments, but they also maintain greater ecological integrity within the forest landscape.

Encouraging greater use of these approaches can also produce broader environmental benefits. Diverse mixedwood forests tend to support healthier wildlife populations by maintaining varied browse, shrub, and canopy layers important to species such as moose, deer, and ruffed grouse. Greater vegetation diversity also supports more robust insect communities, which form the base of many forest food webs. From a water perspective, mixed forests help maintain more stable riparian ecosystems and contribute organic inputs such as leaf litter that sustain aquatic insect populations critical to species like native brook trout.

Soil health also benefits from maintaining forest diversity. Mixed-species stands often produce more varied root structures and litter inputs that support soil microbial communities and nutrient cycling. These processes help maintain long-term site productivity and reduce the risk of soil degradation that can occur when forest systems become overly simplified.

The purpose of raising these points is not to criticize forestry as an industry. Maine's working forests are a critical component of the state's economy and rural communities. Rather, it is to highlight that productive forestry and ecological diversity are not mutually exclusive goals. In many cases, they reinforce one another.

For this reason, it may be worth considering whether Maine's forestry policies could encourage greater use of alternative silvicultural methods that maintain mixedwood forests while reducing reliance on herbicide treatments. Such an approach would help ensure that Maine's forests remain both economically productive and ecologically resilient in the decades ahead.

I spent a great deal of time in the Northern Maine woods. It is very difficult to witness what JD Irving is doing to the forest of Maine. If one truly assesses the impacts to the land, soil, water and wildlife as compared to the practices of the Seven Islands company, it is SHOCKINGLY different and very noticeable.

Thank you for your time and for the Department's continued work supporting Maine's forests and natural resources. I appreciate your consideration of these ideas and would welcome any opportunity to discuss them further.

Sincerely,

A gravely concerned citizen of Aroostook County