Dear USDA

I have been actively involved for more than 20 years in restoration of American chestnut trees as well promoting the burgeoning number of farms, both large and small, promoting an agricultural hybrid chestnut industry in western Massachusetts and eastern New York.

Though these are 2 separate efforts, they have much in common. Both are emerging as stable and sustainable efforts, with the American Chestnut Cooperators Foundation (ACCF) now releasing 100% pure American chestnut trees after more than 50 years of crossing the best of the best of the relatively few large surviving American chestnuts and finally coming up with a tree that they consider to be blight tolerant. They have many trees that have been thriving and producing for more than 25 years.

Progeny from these trees is being provided to many Cooperators, including the New England Botanic Garden at Tower Hill (NEBG) in Boylston MA. Nearly 200 pure American chestnuts were planted in 2023 and 2024 so far and more than 300 pure American chestnuts are on their way to NEBG. This will add to their collection of ACCF chestnuts that’ve been planted in the wilder regions of the garden property, where remnants of a once robust chestnut forest are still struggling to survive. By 2033 NEBG will be awash in pure American chestnut pollen naturally distributed between the new additions and the native American chestnuts there. **No genetic engineering needed here**, as we already have blight tolerant trees to replant into woodlands and parks. The idea of introducing GE chestnuts into this mixture would be insanely unnecessary when the risks are dconsidered.

There is also a growing network of farmers and orchardists growing hybrid chestnut trees. Finally, after buying and eating chestnuts each year for holiday consumption that have been shipped in from abroad and often not handled or stored properly in this process, we will finally have local supplied organic chestnuts on our supermarket shelves. The simple freshness of these chestnuts compared to imported chestnuts is a huge benefit. **No genetic engineering needed here.** Processing equipment is being researched, purchased and/or built to handle the increasing number nuts being produced from the thousands of hybrid chestnut trees being grown here now. These trees are usually considered “organic” in that tree crops, especially chestnut trees, require very little care once established, and rarely are any chemicals needed on these trees.

While lumber, paper & biofuel companies propose genetically engineered trees, it’s simply an effort to grow trees faster and to engineer them to be beneficial to their industries and for them to easily plant, grow, harvest, process and sell, increasing their profits with no regard to the effects this will have on the land or inhabitants there.

1. Genetically engineered chestnut trees are not needed; we already have blight tolerant trees.
2. Genetically engineered trees will compromise the many home and orchard growers, as chestnuts readily cross pollinate.
3. The risks of GE trees is not known, and cannot be known until these trees undergo stringent tests that would take at least 50 years of observation and recording.
4. Who is proposing these trees? Follow the money!

Lois Breault-Melican

7 Emmett Street

Spencer MA 01562