

RE; FSM 2470, Silvicultural Practices #Directives-4178  
project landing page, <https://cara.fs2c.usda.gov/Public/CommentInput?project=Directives-4178>

October 28, 2024

To whom it may be federally concerned, but mostly the public, who are being left out of the true details of climate change solutions being presented by federal agencies in tactics that are massively hidden from the public and even elected office.

This “proposed directive update to the manual to focus on managing forests for climate change” is a major mistake for the future of the natural biodiversity of true nature that we know works!

my concern comes from the updated manual's lack of truth and transparency... specifically the section regarding Biotechnology that leads readers to the thought that only biotech trees will be used; this comment will show that it's NOT simply GE trees... it's much more reckless, Please allow me to explain my viewpoint as I will show how multiple federal agencies will invite the world's “scientists” to do “high risk, high reward” experiments in our public lands by way of federal agencies, and how NGOs will secretly operate under the term of “conservation efforts” and thus far without performing Environmental Impact Statements on new biotechnology techniques that USDA APHIS, FDA, and EPA are currently deregulating/exempting by the command of recent Executive Orders. This major shift in management practices should not be allowed without true transparency to the public.

Let's examine executive orders that secretly drive agencies' reckless decisions on biotechnology. I say “reckless” because there has never been an Environmental impact statement on any of these federal agencies' actions on recent regulation decisions for the use of biotechnology in wildlife!

Multiple entwined Executive Orders have pushed agencies to disregard safety practices, It started shortly after Joe Biden took office with E.O 13990...“restoring science to tackle climate change” (I will use highlights to show the deceitful path of how “science and innovation” will be used in exchange for the term biotechnology) Follow me on this, (there is very little forthcoming in this Order)

> <https://www.federalregister.gov/documents/2021/01/25/2021-01765/protecting-public-health-and-the-environment-and-restoring-science-to-tackle-the-climate-crisis>

Then EO 14081 - “Advancing Biotechnology and Biomanufacturing Innovation for a Sustainable, Safe, and Secure American Bioeconomy”

Note that there is no mention of environmental management practices in [EO 14081](#). However, this requested follow-up report (sec.3, A of the E.O) briefly shows the true intent of biotechnology use in a report called,

“Bold Goals for U.S. Biotechnology and Biomanufacturing:”- 03/23

<https://www.whitehouse.gov/wp-content/uploads/2023/03/Bold-Goals-for-U.S.-Biotechnology-and-Biomanufacturing-Harnessing-Research-and-Development-To-Further-Societal-Goals-FINAL.pdf>

“R&D Needs • Develop genetic engineering and technology tools for high yield crops and forest trees with deeper and more recalcitrant root systems to increase SOC. (Goal 4.1)”

These E.O report recommendations have led to the telling details of the;  
USDA 2023-2026 strategic plan (pdf attached)

<https://www.usda.gov/sites/default/files/documents/usda-science-research-strategy.pdf>

Objective 1.4

“Develop genome engineering, genetic technology, and other technological tools to deliver high yield crops and forest trees for rapid adaption to extreme environmental stresses (e.g., drought) and biological threats.”

And – Priority 4, Cultivating Resilient Ecosystems;

“Key Strategies: Genetically characterize plants and animals within the USDA’s National Genetic Resources Program to better identify and catalog traits that enable future generations to adapt to climate change and to implement innovative solutions that improve sustainability. Develop plant regeneration methods, such as recovering viable plants from single cells or plant organs; for example, for specialty crops or rare/endangered species that have the potential to benefit from genome editing tools. Devise more effective genomic methods to identify and predict desired genetic changes that enable breeders to deliver specific phenotypes to sustainably meet economic, environmental and societal needs”

To verify my concerns, one must understand that USDA APHIS recently had a “public commenting period” for the

“Proposed Exemptions: Movement of Organisms Modified or Produced through Genetic Engineering.” - <https://www.regulations.gov/document/APHIS-2023-0022-0001>

This USDA APHIS 2023 Stakeholders Meeting, time 35:20'ish in this video;

<https://www.youtube.com/watch?v=AuNGzNxts28>, are only two places to reference the details of the biotechnology/genetic engineering "science" being proposed for exemption. Neither APHIS nor I publicly know of any other news on this subject!

Note that the “framework for biotechnology” of all the "proposed Exemptions" will not be decided until December 2024, as stated here,

<https://usbiotechnologyregulation.mrp.usda.gov/eo14081-section8c-plan-reg-reform.pdf>

If this exemption of regulation happens as “proposed” by federal agencies, then biotechnology will be allowed to be unleashed into the biosphere without records, without oversight, and without the knowledge of the public.

Here is more supplemental information from the USDA APHIS 2023 strategic foresight report that is relatively transparent.

<https://www.aphis.usda.gov/sites/default/files/aphis-strategic-foresight.pdf>

Let's examine US Fish and Wildlife Services’ new significant biotechnology role that started with this recap regulatory request.><https://www.fws.gov/project/endangered-species-act-regulation-revisions>

“On June 4, 2021, the U.S. Fish and Wildlife Service (FWS) and the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS), together the "Services," announced a plan to improve and strengthen implementation of the Endangered Species Act (ESA). The plan includes a set of proposed actions that follow Executive Order

13990 (Protecting Public Health and the Environment and Restoring Science To Tackle the Climate Crisis) and will ensure the ESA effectively addresses 21st-century conservation challenges, such as climate change .”

On a side note, to continue showing how deceitful goals are written into strategic plans without disclosing the intent to use biotechnology to reach them, FWS “climate change” link will take you to what I call Reverse-engineering of a solution... No mentioning the true biotechnology processes involved in reaching these goals.

<https://www.fws.gov/glossary/climate-change> Copy/paste from website-

“Climate change presents a growing threat to the nation’s fish, wildlife, plants and their habitats in profound ways. Due to the effects of climate change, some populations may decline, many will shift their ranges substantially, and still others will face increased risk of extinction. Some species will survive in the wild only through direct and continuous intervention by wildlife and fisheries managers.

The challenge of conserving wildlife and ecosystems in the age of climate change will require the U.S. Fish and Wildlife Service and partners to apply the skill, determination, creativity, and commitment to conserving the nation’s natural resources that have defined the American conservation movement since its inception more than 160 years ago.

It is within our power to slow and manage for its effects;

There are two primary ways the U.S. Fish and Wildlife Service is responding to climate change: adaptation and mitigation. The Service is focused on helping fish, plants, and wildlife adjust to the impacts of climate change, as well as moderating the effects of a changing climate using cutting-edge science in conservation, land and species management, and habitat restoration. Adaptation involves adapting and adjusting to the ongoing effects of climate change. This includes planned, science-based management actions that we take to help reduce the impacts of climate change on fish, wildlife, plants, and their habitats.

Adaptation forms the core of the Service’s response to climate change and is the centerpiece of our Strategic Plan. This adaptive response to climate change will involve:

- Strategic conservation of wildlife habitats within sustainable landscapes.
  - Conserving the most climate-vulnerable species through various activities, including but not limited to identifying priority water needs, addressing habitat fragmentation, managing genetic resources, reducing non-climate stressors, and other resource management actions.
  - Informing stakeholders on conservation issues related to energy development and energy policy and help facilitate development of renewable energy sources in a manner that helps conserve species and avoids or minimizes significant impacts to sensitive fish, wildlife, and plant species.
- Mitigation refers to reducing emissions and stabilizing the levels of heat-trapping greenhouse gases in the atmosphere. Mitigation efforts can be as large as a national strategy to reduce greenhouse gas emissions, or they can be as small as a habitat restoration project in your back yard. Mitigation can include reducing our “carbon footprint” by using less energy, consuming fewer materials, and altering our land management practices.

Mitigation is also achieved through biological carbon sequestration, the process in which carbon dioxide from the atmosphere is taken up by plants through photosynthesis and stored as carbon. Sequestering carbon in vegetation such as forests or native prairie grasses can often restore or improve habitat and directly benefit other plants as well as fish and wildlife - and, in many cases, efforts to restore or conserve these ecosystems have cascading effects such as cleaner water, better resilience to wildfire, flooding, and storms, and natural habitats for wildlife and people to

enjoy.

The Service is committed to mitigating the effects of climate change by:

- Developing expertise in biological carbon sequestration — sequestering greenhouse gases in plant biomass, while also creating or restoring priority native plants, fish and wildlife habitats — and foster efforts to sequester carbon on lands it manages.

Facilitating habitat conservation through carbon sequestration at the international level. By working with international partners and stakeholders to help reduce deforestation rates in key areas, such as tropical forests, the Service will help preserve areas critical to biodiversity conservation and support greenhouse gas mitigation.”

This is the Landing page to the federal US Fish and wildlife ESA landing page;

This “program” - Endangered Species

<https://www.fws.gov/program/endangered-species>

“Our Services- To make recovery efforts for listed and candidate species more efficient and effective, we work with others to find ways to invigorate and modernize the implementation of the ESA, using our current conservation tools and developing new ones at every opportunity. Among the tools that play a major part in achieving our conservation and recovery goals are: interagency consultations; incentives for landowners and managers to engage in voluntary conservation partnerships; grants to states and territories, private landowners, and conservation groups to fund conservation projects; and permits that authorize scientific research to learn more about listed species, or activities that enhance the propagation or survival of listed species.”

Federal agencies leave out the planned use of biotechnology at every possible opportunity. Genetic engineering will likely be the normal for Endangered Species, like the cloning of the black-footed ferret. (Not released into nature yet... But, looking into the California condor or South West wolf re-population, I highly suspect that G.E is already currently being used but I would need to put in a FOIA to find out, however, My past submitted FOIAs have never be processed)

<https://www.fws.gov/press-release/2024-04/innovative-cloning-advancements-black-footed-ferret-conservation>

Let me show you how the new rules of the Endangered Species Act, “E.S.A” the rules will assist the new NEPA Act with Genetic engineering, This educational video does a good job of quickly overviewing HPCs (Habitat Conservation Plans), and ITPs (Incidental Take Permits), it also shows how the "applicant" can be "anonymous" and how they are issued by "consulting with self" and are not liable for their actions if "unintended consequence" arises and the "no surprise clause." is extremely reckless when saying that producers of these experiments will not be held accountable for unintended consequences of their experiments. Category exclusions (C.Es) are how biotechnology will be categorized and used if genetic engineering doesn't fall under the “Exemption” rules. Please watch 1:07:48 to 1:15:00

<https://www.youtube.com/watch?v=6f9npmO-fCM>

Also, for your records, here are the new official ESA text details.

<https://public-inspection.federalregister.gov/2024-07602.pdf>

These Executive Orders that made the new rules for the ESA are also in coordination with the implementation of the recently revised NEPA Act (July 1st, 2024), which seems to exclude

public participation when it comes to opinion on “science-based processes” and, in-turn mandates and the use of “science-based solutions” in all possible ways. See CEQ phase 2 (final rule) landing page, May 2024 (a lot of insightful information)

<https://ceq.doe.gov/laws-regulations/regulations.html>, then use the link to>: “Federal registry notice” (Long read- however, CEQ conversates on how they determine that “science” supersedes public opinion. There are other concerns like requiring FOIAs for the public to review EIS, Making public meetings “discretionary,” and a bunch of words that are changed from “shall” to “May” regarding public involvement and also allowing NGOs / Applicants to prepare EAs or EIS consistent with agency procedures...

to further prove the intent Also see 05/1/2014 Q&A on FDA Regulation of Intentional Genomic Alterations in Animals

<https://www.fda.gov/animal-veterinary/intentional-genomic-alterations-igas-animals/qa-fda-regulation-intentional-genomic-alterations-animals>

“Q: How does FDA address potential environmental risks associated with IGAs in animals? Are concerns different for different kinds of animals?

A: Any potential environmental issues would be a function of the traits introduced into those animals and the conditions under which those animals would be raised. For example, a biopharm animal intended to be kept in a contained environment poses a different set of risks from an animal with an IGA that is intended to be released into the environment. FDA will consider potential environmental effects on a case-by-case basis as required by the National Environmental Policy Act. In general, we recommend that early in development developers consult FDA about potential environmental issues and that they consult with FDA prior to developing their approaches to environmental assessments so that we can agree on the risk questions to be addressed and the resulting scope of the environmental review.”

June 20, 2024 EPA Publishes its 2024-2027 Climate Adaptation Plan.

<https://www.epa.gov/newsreleases/epa-publishes-its-2024-2027-climate-adaptation-plan-0>

More programs in the name of climate change to use biotechnology.

<https://www.sustainability.gov/federalsustainabilityplan/resilience.html>

Here are some things that should be publicly addressed before changing management practices,

I request a specific analysis of biotechnology and its possible effects on the biosphere with an environmental impact statement, as none of the federal agencies that I have shown you have conducted a proper EIS on this relatively new technology this 2020 EIS conducted by USDA APHIS is filled with flaws and outdated past practices. (like the GE chestnut tree that history has shown is not what is reflected in the report.)

<https://www.aphis.usda.gov/sites/default/files/340-secure-rule-eis.pdf>

The idea that satellites will monitor the spread of biotechnology is a course for disaster. It can fail due to EMPs, war, or other natural disasters. Satellites should not be trusted to monitor the biosphere solely. Forests should not need a man to watch over nature to make sure it is safe from itself. Please Find a designated area for this kind of experiment that is removed from possible destruction of the most valuable forest areas.

Biotechnology usage information should be disclosed and easy for the public to access. The public should not need to submit a FOIA, as the New Nepa Act suggests, to request information.

In my history of general reading on the NEPA act, I remember that there is a rule that says that a person should explain a rule to a rational degree... My point is, please make it make sense from what I am showing you and explain the true intent of biotechnology to the public.

I would like to request a follow-up public meeting on this biotechnology topic being used and be invited to it. The meeting should include in assessments that fully disclose the proposed amendment's potential effects.

We, the people, have made the American culture and the resources should be accessible by the local inhabitants to the greatest extent naturally manageable. This plan takes us away from that right.

I hope you will represent the plans with biotechnology shown as intended to be used... The public has the right to know what we are investing in.

Please don't forget your role is to serve the interests of all Americans, not special interests. If there is any dignity left in the US Forest Service. Then Please Mandate an EIS before release!

Josh Wilson – President, By and for the People  
byandforthepeople.org