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Comments: Thank you for the opportunity to submit my comments and objection to FSM 2470, Silvicultural Practices #Directives-4178. I strongly object to this project. Proposing the introduction of Genetically Engineered (GE) trees will not provide any benefits to combat climate change, old growth and certainly has nothing to do with use of Indigenous Knowledge.

The American Chestnut Foundation (TACF), has strongly denounced the D54/58 GE chestnut stating that its genetic defect makes it unsuitable for restoration purposes, and opposes its deregulation by the USDA:

"Throughout 2023, TACF and its partners observed disappointing performance results from broad-scale field and greenhouse tests of advanced generations of Darling trees across several geographic locations. [Our] analysis indicated striking variability in Darling trees' blight tolerance, significant losses in growth competitiveness, reduction in overall fitness including stunted growth, leaf browning and curling, and increased mortality. View an outline of the body of evidence concerning Darling's performance issues on the Darling 58 Performance page."

"In Darling 54, the OxO gene has been inserted into a coding region, causing a deletion of 1,069 base pairs in a salinity tolerance gene called SAL1. ..."

"The fact that the 35S OxO construct in D54 interrupts a known gene, and has caused a large deletion of that gene, combined with the disappointing performance of the D54 trees in the field and the observed lethal homozygosity, have led TACF to conclude that this product should not be distributed or propagated beyond permitted sites. TACF believes these genetic issues should not be proliferated into current or future restoration or commercial chestnut populations."

The Darling 54/58 GE American chestnut, proposed for USDA deregulation, was a dismal failure and were found to be defective. If released into forests, they would likely contaminate many of the millions of remaining wild American chestnuts with this defect.

The American chestnut is being restored in spite of the attempts to genetically engineer it. Blight resistant 100% wild American chestnuts are already being grown and distributed.

GE trees should not be introduced into any of our National Forests.