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Comments: In this directive, the USFS is adding language that would open the door to the use of genetically engineered (GE) trees on public National Forest lands. This is terrible public policy.

Attempts to develop a GE American chestnut tree have failed spectacularly. GE trees pose unknown, unknowable and irreversible risks to forest ecosystems, including songbirds, wildlife, beneficial fungi, soils and other biodiversity.

The specific mention of the GE American chestnut tree by the Forest Service as a reason to open public lands to GE trees is an example of why this proposed language must NOT become official Forest Service policy. The Darling 54/58 GE American chestnut tree, proposed for USDA deregulation, was a dismal failure. These GE trees were defective. If released into forests, they would likely contaminate many of the millions of remaining wild American chestnuts with this defect, dooming their recovery.   A longtime proponent of this GE American chestnut, the American Chestnut Foundation, has strongly denounced the D54/58 GE chestnut tree. Their position is that the D54/58 GE chestnut tree has a genetic defect that makes it unsuitable for restoration purposes. Consequently, the American Chestnut Foundation opposes its deregulation by the USDA.

The D54/58 GE chestnut tree is a concrete example of the unpredictable risks of GE trees. Restoration of the American chestnut is being accomplished in spite of the attempts to genetically engineer it. Blight resistant 100% wild American chestnuts are already being grown and distributed.

In summary, GE trees pose unprecedented, irreversible and unnecessary threats to forests. I urge the Forest Service to ban GE trees from public forests, and delete any language to the contrary in this Directive or any other Forest Service directive.