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Comments: I thank the USFS for accepting public comments regarding this issue. It has come to my attention that the Service is proposing adding genetically engineered trees to a history of clearcut logging, spraying of toxic herbicides, roadbuilding and other mismanagement of our public lands, and I am compelled to voice my most vehement opposition to it. Our choices have already dangerously compromised the integrity of our natural world--this next move could prove to be our last.

The specific mention of the GE American chestnut by the Forest Service as a reason to open public lands to GE trees demonstrates either a callous disregard for forest health or a fundamental lack of understanding of the threats it poses. The Darling 54/58 GE American chestnut, proposed for USDA deregulation, was a dismal failure. The 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--and the countless other species depending on them!

Even a longtime proponent of this GE American chestnut, the American Chestnut Foundation, 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 GE American chestnut is a concrete example of the unpredictable risks of GE trees--and the risk is not worth the taking. Why? 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.

I urge the USFS to steward our woods in conjunction with nature to preserve nature rather than trying to strong-arm them using nascent, flawed human tech. It is not hyperbole to suggest that our next steps have the potential to spiral out of control into an extinction event. GE trees pose unprecedented, irreversible, and unnecessary threats to forests, and the Service simply must ban them from public forests for the safety of all life. Thank you.