



SOUTHERN GROUP OF STATE FORESTERS
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October 13, 2020

Docket No. APHIS-2020-0030,
Regulatory Analysis and Development, PPD, APHIS,
Station 3A-03.8,
4700 River Road Unit 118,
Riverdale, MD 20737- 1238

To Whom It May Concern:

The Southern Group of State Foresters (SGSF) supports the Petition for Determination of Nonregulated Status: State University of New York College of Environmental Science and Forestry; Blight-Resistant Darling 58 American Chestnut (Docket Number: APHIS-2020-0030). SGSF represents the interests of the state government forestry agencies from a 13-state area of the southern United States, with a majority of our states in the historic range of the American Chestnut. The SGSF mission is to provide leadership in sustaining the economic, environmental, and social benefits of the South's forests.

One of the greatest challenges in our state-level and regional work is combating forest health threats, including insects and disease. The story of the decline of the American Chestnut at the hands of the invasive chestnut blight fungus was one of the first examples of what has become sadly more prevalent in our region and our nation – the susceptibility of forest tree species to insects and disease that threaten the health and integrity of entire ecosystems. Recent invasive pest infestations of Emerald Ash Borer, Hemlock Woolly Adelgid, and many others give testimony to the myriad threats our native forest species face.

The decision to allow genetically modified organisms (GMO) into our nations forests is not one that should be taken lightly, and without due diligence on assessing the potential benefits as well as risks from introduction. Our support of this specific petition should not be construed in any broader fashion to be supporting GMO use writ large. We believe the case of this petition for Blight-Resistant Darling 58 presents the hallmarks of appropriate and targeted GMO use.

First and foremost, the intent of its use is restoration of a native species, the American Chestnut. Genetically, save for the addition of a single gene, Darling 58 is identical to the American Chestnuts that once dominated much of the forest land in the eastern U.S. The American Chestnut is unlikely to be restored as a viable part of the American forest landscape in the near future without the use of the blight-resistant gene to amplify the cross-breeding work already being done throughout the species range.

Second, and equally important, is the work that has gone into its development and other Chestnut-related efforts from the forestry research community, which have shown no evidence of potential negative side effects from cross-breeding or manipulating the genetic composition of chestnut species. This is not a hasty idea, but one that is the result of diligent research and collaboration across multiple disciplines in an effort to address one of the most visible and impactful forest species declines of the 20th century.

As forestry professionals, we support the content expressed in the Society of American Foresters (SAF) Position Statement on Regulation of Genetically Modified Trees¹. Like SAF, we support well researched GMO efforts that play a role in native species restoration. In addition, we encourage policymakers to “diminish regulations that make field tests excessively costly, burdensome, or that limit duration of these tests. These sorts of excessive regulations impede the ability to complete economically and ecologically significant research and, thus, impede timely understanding or realization of the benefits or costs to society of this new technology.”

The use of Darling 58 in repopulating the American Chestnut across the east would be the first instance to our knowledge of using GMO to help restore a native species. However, it will sadly certainly not be the last species restoration challenge the forestry community takes on in the face of a growing invasive species problem. Using technology, including GMO development, in forging a new frontier in species restoration will be necessary. We support the Darling 58 petition, and hope APHIS allowing its use will encourage scientists and foresters to think boldly about future restoration research.

Sincerely,

A handwritten signature in blue ink that reads "Scott L. Phillips". The signature is written in a cursive style and is centered on a light-colored rectangular background.

Scott Phillips
State Forester, South Carolina
Chair, Southern Group of State Foresters

¹ https://www.eforester.org/Main/Issues_and_Advocacy/Statements/Regulation_of_Genetically_Modified_Trees.aspx