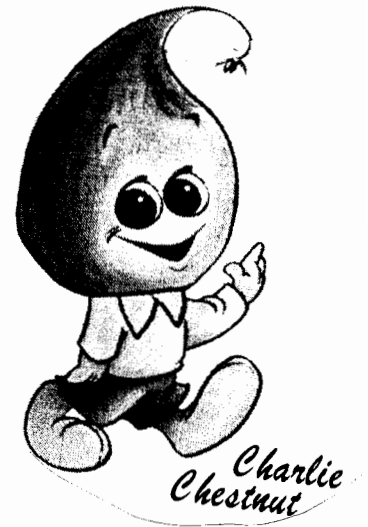




NEW YORK STATE CHAPTER
AMERICAN CHESTNUT FOUNDATION, INC.

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August 1, 2003

Mr. John M. Cordts,
Biotechnology Regulatory Services, Unit 147
USDA/APHIS
4700 River Rd.
Riverdale, MD 20737

Dear Mr. Cordts,

As President of both the New York State Chapter of the American Chestnut Foundation and the National American Chestnut Foundation, I have been involved for more than a decade with the researchers conducting genetic enhancement of the American chestnut (*Castanea dentata*). Our long-term goal is the restoration of this once-magnificent species to the forests of the Eastern United States.

I was not able to attend the July 8-9 USDA-APHIS public meeting in Washington, but two areas expressed at that meeting were brought to my attention and deserve special comment. They are; 1.) the duration of field trials, and 2.) allowing the blight resistant transgenic trees to breed with wild populations.

Field Trial Duration

The tree breeder on our advisory board tells me that great progress was made in the last half of the 20th century in learning how to conduct short term genetics trials to predict long term performance. Some traditional tree breeding programs now make selections at five years of age or less. This knowledge is directly applicable to transgenic trees. Requiring full-life-cycle testing of transgenic trees is completely unnecessary and will pose an absolutely insurmountable barrier, both for the American chestnut project and for implementation of genetic engineering of forest trees in general. Tree ring counts showed that some of the old-growth chestnuts that were killed by the blight were over 400 years old! We suggest a reasonable target would be flowering age plus a year or two, so that the nuts could be evaluated for edibility by humans and wildlife. Beyond that age, very little additional information would be obtained and only at the cost of great delays.

Containment

Requiring containment of the final release product will significantly hold back our program, and serves no useful purpose. The current containment standards for isolation zones, monitoring and removal of flowers, and following the test site for several years after the trees are removed, all

make good sense - for field trials. However, once all reasonable efforts have been made to insure that a new genetic construct is effective, safe, stable, and poses no observable risk to humans or the environment, it should be truly "released". It should be treated no differently from any other source of genes.

The movement of blight resistant genes into natural chestnut populations will be a key part of TACF's Genetic Restoration Program. For more than a century the American chestnut has been dwindling away toward extinction. Although dramatically reduced from what it was, at the start of the 20th century, the remnant gene pool, in the form of stump sprouts scattered throughout the original range, still contains a great deal of untapped genetic variation. The best way to ensure the long-term survival of this species is to carefully introduce our blight resistant transgenic trees into these remnant populations, then allow cross pollination to occur between the blight-resistant introduction and the blight-susceptible remnant populations. I feel that the genetic enhancement of the existing American chestnut population is the best approach to keep the species from becoming extinct.

The American Chestnut Foundation is turning a biological disaster into an environmental success. To this end we ask your assistance in making this happen as safely and as soon as possible.

LONG LIVE THE AMERICAN CHESTNUT!

A handwritten signature in black ink, appearing to read "Herbert F. Darling". The signature is fluid and cursive, with a large loop at the top.

Herbert F. Darling, President
THE AMERICAN CHESTNUT FOUNDATION