Public Comment: Best Practices & Sample Submissions

Please consider voicing your opinion by submitting a public comment

The State University of New York College of Environmental Science and Forestry (ESF) has filed a petition with the United States Department of Agriculture's Animal and Plant Health Inspection Service (USDA-APHIS) which, once approved, will clear the way for restoration planting programs and large scale reintroduction. The USDA-APHIS 60-day public comment period is now open. Review the PCP FAQ's for more information.

BEST PRACTICES FOR PUBLIC COMMENTS

- Make sure your comment is **concise** and **original**.
  - Do not cut and paste a comment from a generic template.
  - USDA-APHIS reads each comment individually and "form-letter" comments have less impact.
  - Note comments are limited to 5,000 characters; you can also choose to upload comments on the site
- Be **authentic**.
  - An opening statement identifying who you are and what your experience is can help establish credibility.
- Clearly **identify any specific issues** you are commenting on within the regulatory action.
  - Include a **heading** that states the regulation name **Petition for Determination of Non-regulated Status: State University of New York College of Environmental Science and Forestry; Blight-Resistant Darling 58 American Chestnut (Docket Number: APHIS-2020-0030)**
  - This demonstrates you are taking the time to carefully review the document.
- Provide accurate **scientific evidence and data** (if you have it).
  - Clearly communicate implications of any research you present.
  - Comments from academics/scientists are especially persuasive to USDA-APHIS. We encourage academics/scientists to outline evidence that supports the scientific basis for the petition in their comments.
  - Include attachments to any relevant research reports, data, links to studies, and/or documents that support your comment.
- Consider incorporating any of these **messaging points** within your public comment submission.
  - These are factual conclusions and supporting logical points that are addressed in SUNY-ESF's Petition that are likely to have the most relevance to USDA-APHIS's decision-making.

SAMPLE PUBLIC COMMENTS (remember, this is not for cutting and pasting but to give you an idea of sample language and tone)

Sample 1 (individual comment/general, non-science background)

As a concerned citizen and environmental activist, who believes that we must take immediate action to combat the negative impacts of climate change, I believe that Nonregulated Status for the Blight-Tolerant Darling 58 American Chestnut will allow scientists to save an important species from extinction.

ESF's research has shown that successful restoration of the American chestnut can have many environmental benefits ranging from mitigating the negative impacts of carbon emissions to possibly even serving as a model for restoration of other endangered species in the future. And the scientists involved with this project have gone above and beyond to ensure that the Darling 58 tree is safe for both humans and the environment. Without human intervention, the American chestnut will surely go extinct. If we have the means to save this species, or others, we must do so.

I urge USDA-APHIS to rule in favor of **Petition for Determination of Non-regulated Status: State University of New York College of Environmental Science and Forestry; Blight-Resistant Darling 58 American Chestnut (Docket Number: APHIS-2020-0030)** and allow the restoration of the American chestnut to the forests.

Sample 2 (individual comment/chestnut background)

I have been growing chestnut trees for more than 13 years, so I was very interested to see this petition for a blight resistant American chestnut (Nonregulated Status for the Blight-Tolerant Darling 58 American Chestnut).

I understand that one of the key points that APHIS has to address in this review process is whether the modified plant might pose any weed-like risks. Based on my chestnut growing experience, I would like to weigh in on that. To me, a weed is a plant that is: 1. Not native, 2. Not wanted, and 3. Fast-spreading. American chestnut trees do not fit ANY of these descriptions. They are clearly native, forming an important part of our continent's history for thousands of years. They are desirable by humans for food, lumber, wildlife support, and aesthetic beauty. And while they can grow quickly, they don't spread quickly on their own. In fact, I spend a great deal of time and money just ensuring that young chestnut trees stay alive for the first few years after planting! Dealing with unexpected volunteer chestnut trees is simply not a concern, at least for the first several decades after planting.

I've dealt with trees that are weeds: black locust, tree-of-heaven, Norway maple, Bradford pear, and some poplars come to mind. American chestnut clearly does not fit into the same category as these. And most importantly, the new modification of blight resistance from OxO shouldn't change the non-weedy characteristics of American chestnut. The chestnut wasn't weedy before blight arrived in the U.S., so a blight-resistant version shouldn't be weedy now. Also, the Chinese chestnuts and fast-growing hybrids in my orchards are generally quite blight resistant, but that does not make them weedy. It's just not conceivable that adding blight resistance to an American chestnut tree would make it a weed. And while I probably won't grow pure American chestnuts in my orchards (transgenic or not), I am very excited that we have the possibility of bringing back this amazing tree, so I fully support the idea of using transgenic chestnuts for forest restoration.

Sample 3 (individual comment/science background)

As a plant physiologist with [insert qualifications or affiliations as appropriate] I would like to comment specifically on the oxalate oxidase enzyme that is expressed in Darling 58 transgenic chestnuts. This particular enzyme from wheat (EC 1.2.3.4), along with oxalate oxidases with similar activity from other plants, are familiar to almost anyone who studies monocot germination or plant responses to necrotrophic fungal pathogens. Many monocots express oxalate oxidases during seed germination processes, which is why they are also known as germins (Lane et al. 1993, J. Biol. Chem v268). The resulting enzymatic activity is likely involved in both cell wall formation and liberating calcium needed for germination and growth, which is otherwise sequestered in the form of calcium oxalate crystals (Dumas et al. 1995, Plant Physiol. v107). The same enzymes are also widely employed by monocots in response to fungal pathogens: some of these pathogens secrete oxalate, but in other cases, the oxalate oxidase stimulates other disease response pathways in the plants (Yarullina et al. 2016, Appl. Biochem. Microbiol. v52).

The reason I'm explaining this is to emphasize that oxalate oxidase is not a risky or unfamiliar compound. On the contrary, it is widespread and well-understood in cultivated food and natural systems. I am not aware of any scenario in which oxalate oxidase would be considered dangerous or risky to plants, animals, or people. Oxalate oxidases are actually being tested as treatments for both people and plants, since oxalate is toxic to both types of organisms (Zhao et al. 2018, Nano. Res. v11; Yang et al. 2019, Transgenic Res. v28). In fact, since monocots have presumably been employing oxalate oxidase as a defense against necrotrophic pathogens since these pathogens have existed, oxalate oxidase shouldn’t even present a novel risk to the blight fungus. Given its ubiquity and familiarity, and the noteworthy lack of risks that have been observed with oxalate oxidase in many other systems, it's extremely unlikely that this enzyme could somehow become risky when expressed in chestnuts.