



81 Crown Mountain Place
Building C, Suite 200
Dahlonega, GA 30533

706.867.0051
info@gafw.org
www.gafw.org

September 20, 2021

USDA Forest Service
Southern Region (R8)
1720 Peachtree Street, NW
Atlanta, GA 30309

Re: Regional Slow the Spread Project

Dear Mr. Arney,

Thank you for the opportunity to comment on the proposed action to treat certain areas of the Chattahoochee Oconee National Forest and adjacent private, state and other federal lands within surrounding counties under the "Slow the Spread" and eradication programs of the United States Department of Agriculture's (USDA's) National Gypsy Moth Management Program.

Upon review of the proposed actions Georgia ForestWatch provides the following comments on the "Slow the Spread" eradication programs targeting the invasive Gypsy Moth.

- Expanded focus and funding for detection trapping. With the limited recent infestations in Georgia the Forest Service should prioritize trapping in the potential infestation zones. Abundant trapping allows for a clear picture of infestations when they are small and manageable and will reduce the need for post infestation treatments saving both resources and potential negative effects of those treatments.
- If an infestation is found the geographic and treatment scope should be as limited as possible to address the issue.
- The first line of treatments should be an individual treatment or a selective combination of the Nucleopolyhedrosis virus (NPV) and/or mating disruption via pheromones administered in a manner that is as environmentally friendly as possible.
- Only as a last resort to a resilient and expanding infestation should *Bacillus thuringiensis* var. *kurstaki* (Btk) be used as it has potentially negative effects on non-target natives.
- Provide public notification in advance of any and all treatments options planned and scheduled.

GAFW appreciates the proactive approach of the Forest Service as it addresses the invasive Gypsy Moth infestation. If our organization can provide any additional input or assistance, please do not hesitate to ask.

Sincerely,

J.D. McCrary
Executive Director
Georgia ForestWatch
81 Crown Mountain Place, Bldg. C, Suite 200
Dahlonega, GA 30533
(706) 867-0051

CC: Christopher D. Jones, Interdisciplinary Team Leader