



United States Department of the Interior



NATIONAL PARK SERVICE
Great Smoky Mountains National Park
Park Headquarters Building
107 Park Headquarters Road
Gatlinburg, TN 37738

IN REPLY REFER TO:

1.A.2.

Kenderick Arney
Regional Forester
USDA Forest Service, Southern Region
1720 Peachtree Street
Atlanta, GA 30309

October 5, 2021

Re: USDA Forest Service Regional Slow the Spread Project

Dear Mr. Arney:

Thank you for the opportunity to comment on the USDA Forest Service Regional Slow the Spread (STS) Project. Great Smoky Mountains National Park (Park) is supportive of efforts to manage forest insects and diseases and has cooperated with USFS – Forest Health as well as state divisions of forestry in annual gypsy moth trapping throughout the park since the early 1990s. We have delineated our old growth oak forests and worked with cooperators to identify potential non-target invertebrates to consider when treatment becomes necessary. Two species are of particular concern:

Tawny crescent- *Phycoides batesii*-critically imperiled (S1) in TN and imperiled (S2) in NC

Diana fritillary -*Arygynnis diana* -vulnerable (S3) in TN and NC

These species have been identified by NatureServe as vulnerable to gypsy moth control operations. In particular, the Diana fritillary has shown ‘extreme sensitivity’ to Btk in 3rd instar larvae (see the 1998 publication by Peacock *et al* entitled ‘Laboratory Assessment of the effects of *Bacillus thuringiensis* on native Lepidoptera’). Additionally, the well-known monarch butterfly, *Danaus plexippus*, while considered ‘apparently secure’ by NatureServe, has been considered as ‘endangered’ or ‘threatened’ by the U.S. Fish and Wildlife Service. However, listing has been ‘precluded’ by higher priority species. Should the Park be part of an STS larval spray operation, the presence of these species indicates a priority for using the gypsy moth-specific larvicide commonly called ‘Gypchek’. Therefore, we seek further discussion and coordination on these or other methods to prevent impacts to these non-target species within the Park.

With regard to visitors in the backcountry, the 30-day notice for treatment will help the Park notify visitors of any needed area closures.

Interior Region 2 • South Atlantic–Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

We look forward to working together on this important effort. If you have any questions, please contact Supervisory Forester Kristine Johnson at (865) 436-1707 or by email at kristine_johnson@nps.gov.

Sincerely,

A handwritten signature in dark ink, reading "Lisa McInnis". The signature is written in a cursive, flowing style.

Lisa McInnis
Chief, Resource Management and Science