

Chattooga Conservancy
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The Chattooga Conservancy respectfully submits these comments concerning ***Regional Slow the Spread Project #60529***

The Chattooga Conservancy is a non-profit conservation organization working to protect, promote, and restore the natural ecological integrity of the Chattooga River watershed ecosystems; to ensure the viability of native species in harmony with the need for a healthy human environment; and, to educate and empower communities to practice good stewardship on public and private lands. The Chattooga Conservancy has an organizational interest in the proper and lawful management of public lands within the Chattooga River watershed, including the Sumter, Nantahala and Chattahoochee-Oconee National Forests. Our members, staff and board members participate in a wide range of activities on these national forest lands, including those areas that would be impacted by the proposals set forth in the subject documents. We represent approximately 600 total members that support the Chattooga Conservancy's work. Our members seek solitude, forested scenery, old growth stands, clean water, as well as opportunities for nature study and a wide variety of recreational activities within Chattooga River watershed including portions of the project area that would be affected by the proposed *Regional Slow the Spread Project*. Our collective membership also includes citizens whose private lands would be directly impacted by the *Regional Slow the Spread Project*.

Ecological & Health Concerns:

We understand the scope of damage caused by *L.dispar* to our native hardwood forests, and agree with the need to slow their spread. However, we hold concerns over some of the treatment options proposed for this project.

Primarily, we hold significant skepticism over the collateral damage that could result from Treatment Options 2 and 2b, which include the aerial spraying of harmful pesticides that are not at all target-species specific. The proposed widespread use of either Foray 48b or 76b, proprietary blends of *Bacillus thuringiensis* var. *kurstaki* (Btk,) will, by nature, disrupt and devastate populations of native and beneficial Lepidoptera. As per the product label for Foray 48b: "*This product must not be applied aerially within 1/4 mile of any habitats of threatened or endangered Lepidoptera.*" The proposed scoping notice is entirely devoid of any plan to scout, identify, and delineate any spray areas that could be hosts to threatened or endangered Lepidoptera. We are unconvinced that the eradication of the *L.dispar* through widespread aerial spraying at the expense of other Lepidoptera is neither ethical, ecologically sound, nor wholly necessary.

Furthermore, the language used in your Scoping Notice to assuage public concern over the health & safety of the inert ingredients in these Btk mixes is underwhelming, to say the least. An astounding **87.35%** of Foray 48b ingredients, and **81.56%** of Foray 76b ingredients, are kept secret as proprietary information by their manufacturer, Valent BioSciences. Labelling these ingredients as “**typically** food-safe”, and promoting that they appear on a “Generally Recognized as Safe” FDA list, does not promote public confidence.

Procedural Concerns:

While technically legal under NEPA guidelines, we are disappointed that the Forest Service is planning to **not allow** an additional comment period when they release a final Environmental Assessment (EA) in 2022. To opt to simultaneously release a Findings of No Significant Impact (FONSI) with an EA, without first receiving public comments on said EA, is a deviation from an established norm on public participation, and one we hope the Forest Service chooses to review.

Summary:

Of all proposed treatment options, we strongly advocate for the use of Mating Disruption via Splat-GM Organic wherever and whenever possible. As large outbreaks of *L. Dispar* occur sparingly (every 8-10 years), we believe this species-specific, low-impact treatment option to be ideal for both ecosystem health and *L. Dispar* control. However, whenever *L. dispar* population densities are categorically deemed too high for solely utilizing Mating Disruption, we suggest the application of Treatment Option 3b (Gypchek Use & Mating Disruption). As a general rule, we are vehemently against the use of widespread, non-species specific pesticide application, and urge the Forest Service to consider Treatment Options that pose the least amount of risk to other Lepidoptera species.

We appreciate the opportunity to submit our comments and concerns about the *Regional Slow the Spread* project, and look forward to hearing your response.

Sincerely,



Eric Boatti
Program Associate
Chattooga Conservancy