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Comments: 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.