

Data Submitted (UTC 11): 9/20/2021 5:09:07 PM

First name: Michael

Last name: Schafale

Organization: North Carolina Natural Heritage Program

Title: Ecologist

Comments: The Natural Heritage Program supports the Slow the Spread project and gypsy moth eradication treatments where appropriate. Gypsy moth is an introduced species that is a major threat to many natural resources, including many of the rare species, significant natural communities, and natural areas on the National Forests in North Carolina. The current proposal is very general, encompassing a broad range of possible treatments and not giving specific locations. Because some of the proposed treatment options would be harmful to non-target native Lepidoptera and, indirectly, to native ecosystems, it is helpful that a Sensitive Resource Protection Phase is included in the implementation framework. We would recommend that sensitive resources receiving special consideration include not just the categories specifically listed in the framework, but all known locations of rare butterfly or moth species, current and proposed Special Interest Areas, and other natural areas identified by the Natural Heritage Program. We would request notification and consultation with the Natural Heritage Program if identified natural areas are involved. While many of these areas would not need special treatment, those with rare, small, or isolated habitats may harbor local species which may not be able to return if they are extirpated. For such areas, treatment with the more specific options such as nucleopolyhedrosis virus and mating disruption pheromones may be a better option.

Thank you for your consideration.