



Roy Cooper
Governor

D. Reid Wilson
Secretary, Department of Natural and Cultural Resources

Will Summer
Director, Division of Land and Water Stewardship
Executive Director, NC Land and Water Fund

October 25, 2024

Susan Miller, Uwharrie District Ranger
789 Biscoe Road
Troy, NC 27371

Subject: Lomax Project EA

Dear Ms. Miller:

The Natural Heritage Program commented on the scoping letter for the Lomax project. We have now reviewed the Environmental Assessment for that project. Our initial response to the scoping letter in November 2023 indicated the extremely high ecological significance of some of the proposed treatment units and noted that the proposal was unspecific enough that it was unclear what the impacts would be. As noted in the EA, several Natural Heritage Natural Areas, Special Interest Areas, and Registered Areas are involved in the project. We have focused on the area known as the Lomax Church Longleaf Pine Forest because the entirety of that natural area is proposed for treatments, but the same concerns apply to the other natural areas where treatments are proposed.

Within the Lomax Church Longleaf Pine Forest are substantial areas where restoration of the Piedmont Longleaf Pine Forest ecosystem is essentially complete. They need nothing but continued prescribed burning. Further cutting of trees would not benefit these areas. Operating in these intact Longleaf pine areas would be contrary to the stated intent of national forest management to restore and improve Longleaf pine habitats. Other areas still have significant loblolly pine and could possibly benefit from thinning. These areas were lumped together in the same, extremely heterogeneous, stand units, and all were proposed for uneven-aged management treatment.

Because of the unclarity of the extent of intended cutting, we requested a field meeting with Forest Service staff. At that meeting, we reviewed areas that would be appropriate to cut and areas that would not, as well as areas that should be avoided as buffers to streams and wetlands. The EA that has been published continues to include the entirety of this natural area in treatment units, most of them proposed for uneven-aged management that may include clearcuts up to 40 acres in size. There is no indication of recognition of the highly significant portions. The designated stands continued to be heterogenous and to mix areas in need of restoration with areas where any entry would be harmful. The environmental assessment therefore does not truly indicate the true scope and impact of this project. We thus remain seriously concerned.

We do note that the section on mitigation states:

“Consult with North Carolina Natural Heritage Program (NCNHP) biologist prior to implementing treatments in Registered Natural Areas, and Special Interest Areas (SIA) would occur. Within the proposed project area, this includes the following Registered Natural Areas: Lomax Church Area Longleaf Pine, Spencer Creek Hillside Seepage B (also SIA), Rock Creek Longleaf Pine Forest and Bogs (also SIA), Sand Beach Natural Area. Management activities planned within these rare ecological systems should generally be limited to maintenance or restoration activities addressing their specific composition, structure, or natural system function needs.”

The last sentence in this statement does indicate the appropriate principle with which to approach activities in these highly significant areas. If the intent is to consult further with the Natural Heritage Program about which areas should be included in treatments, as cutting areas are being marked, this would be a way to avoid serious impact to the ecological values.

The Lomax unit is one of the ecological treasures of Uwharrie National Forest. We encourage the utmost care with any timber management activities planned there.

Sincerely,

A handwritten signature in blue ink that reads "Michael P. Schafale". The signature is written in a cursive, flowing style.

Michael P. Schafale
Natural Heritage Program

cc: Victoria Payne