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Comments: Thank you for the opportunity to comment on the Uwharrie Roads Draft Environmental Assessment (August 2022). The Natural Heritage Program works as a partner with the USDA Forest Service in protecting biological diversity, rare species, and significant natural areas on the forest.

When the Uwharrie Roads project was initially described in the scoping letter March 2021, we were very concerned about the proposed impacts to the Dutch John Creek Special Interest Area and populations of NC Threatened and Endangered plants in the area. The new Alternative 3 and the dropping of Alternative 2 is a great improvement in the project. Field investigation indicated that Alternative 2 would result in nearly total destruction of the state's largest population of NC-Endangered Carolina thistle (Cirsium carolinianum), which occurs along the roadsides in the southern part of the project roads, within the footprint of the proposed widening. Alternative 2 would have also impacted a roadside population of NC-Threatened and US-Candidate Georgia Aster (Symphyotrichum georgianum). That proposal would also have required a plan amendment which would have removed protection from Dutch John Creek Special Interest Area and reversed a commitment to protect that area. To our knowledge, amending a Forest Plan to remove protection from a Special Interest Area would be an unprecedented action within the National Forests in North Carolina.

Alternative 3 in the Draft EA has removed the actions that caused our primary concern, yet continues to address the needs identified for the project. Alternative 3 provides for improving the roads that carry heavy traffic and have substantial maintenance problems: Moccasin Creek Road and the northern part of Dutch John Road. Southern Dutch John Road and Green Gap Road, where the endangered plants are located, carry only light traffic. While not being paved, providing turnouts in locations without rare plants will help with any traffic flow issues in this area. Homeowners using these roads for access to their property should experience faster access with the improvement of miles of road, while not seeing an increase in public attraction to their lands that paving roads to their boundary is likely to promote. The existing road is adequate for emergency vehicle access to the private lands.

While we are pleased that Alternative 3 avoids impacts to the rare plants and the Dutch John Creek Special Interest Area, we do note that the Carolina thistle population is entirely confined to the road right of way and would be vulnerable to any grading beyond the road's travel surface where plants occur. Any grading of the wider road corridor would require a NEPA review similar to that done for this project, and should not be considered "routine road maintenance". Care is needed in selecting contractors, communicating maintenance limits, and writing contracts for road maintenance to avoid harming rare plant populations by expanding the roadway footprint.

Once again, we thank you for your consideration and stewardship of our natural heritage in the Dutch John Creek area and throughout the Uwharrie National Forest.