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Comments: I object to the finding of no significant impact on a number of reasons. I am elaborating on my previous comments regarding impacts to trails and the unnecessary damage to our environment with the proposed action. First and foremost, the Final Environmental Assessment grossly under-estimates the impacts that a widening of the ROW and HTZ will have on the recreational trails it crosses in section 3.11. Of all the trails it crosses, Avery Creek Trail (Tr 327) will have the greatest negative impacts as the proposed addition of 25 feet on both sides of the existing ROW, and HTZ removal, would completely change the experience of using this trail from one that has a largely-intact "backcountry" feel to it, to one that would feel much less raw. I have attached photos of the existing trail corridor, as well as a sample of an enlarged ROW in Nantahala National Forest near Panthertown Valley. I also submitted videos to Lauren Onofrio as directed. It should be very clear how much this will change the experience of Avery Creek Trail. The proposed increased ROW crosses Avery Creek Trail northwest of Buckhorn Gap Trail 4 times. Most mountain bike riders using Avery Creek Trail use Buckhorn Gap Trail to exit the drainage back to Avery Creek Road, so they would experience a fifth ROW on that trail, in addition to increased ROW size on Avery Creek Road itself. Using pesticides to keep the lower vegetation at an even more reduced level would expose the trail to even more extreme sun and rainfall would increase erosion on the trail itself. The trail has a lot of clay content so it will hold water extremely well in the winter, and more sun will heat it up faster, causing the freeze/thaw cycle to take place in an even wider swath. I see no access points identified between Number 15 and 16, which suggests new or existing roads/trails will be used to access the corridor stretching from the Club Gap/Avery Creek/Buckwheat/Black Mountain intersection to the Buckhorn Gap Tr and Avery Creek Road intersection. This is not specific enough to ensure that Duke Energy does not use foot/bike trails between those locations to access and perform their work. I see requirements for the USFS to approve any new paths and restricts usages to UTVs, but I do not trust Duke to respect those requirements, nor do I think the USFS will be able to enforce them. It is more likely that Duke will just ram through their work and say "oops, sorry..." Further, the EA suggests that any impacts on recreational activities of this ROW project will be temporary and that is absolutely not true. I have been recreating in Panthertown Valley for over 20 years and the powerline corridor there has never changed--it has always been an eyesore, full of dead and dying vegetation, hot and dry--a stark contrast to the scenic beauty of the whole valley. These changes will be permanent impacts to the experience of recreation in Pisgah throughout this corridor, the trails and impacts to the watershed for at least as long as the power lines exist (and therefore, the ROW/HTZ is maintained).

Additionally, I have attached an email from Korey Meadows (Duke Energy) that clearly contradicts the EA. Mr. Meadows states that "access to and within the ROW will be improved." Yet within the EA, it says that "The proposed action does not include new access points..." (page 67 General #11 response). The same response from the USFS says that "Duke Energy could need to clear a path through vegetation within the ROW to safely access clearing areas and to access hazard trees within the HTZ." This is the same as creating a new trail/road, even if it's only for use with a UTV. In the aforementioned email, Mr. Meadows does not provide a causation-based rationale for the ROW expansion. He does not prove that the vegetation in this HTZ is causing any more of a problem than it would after the updates. Of course he says access will be improved, but per the EA it states that no new access points will be created, so his argument is flawed. I would argue that this ROW expansion is not needed, and there is not enough evidence to prove a causative relationship between the vegetation and reliable power transmission to Canton. In fact, you'll see in some of my photos that the corridor is already wider than they claim in places (75' in one spot along Avery Creek Trail), and there are VERY few trees that could impact the power lines if they happened to uproot and fall over in the longest possible arc to the ground.

In Transylvania County (and across the WNC region), we have also just seen how badly private contractors (which Duke would use for this project) can destroy an ecosystem like they did with the debris removal projects in the French Broad River and others. Given the personnel and funding cuts of this administration, the USFS is not

in a position to firmly monitor this project. Although I applaud all of the rules in place to try and mitigate the impacts of this project, we cannot trust a private company, employing private contractors, under inconsistent supervision from an understaffed and under resourced federal agency to fully comply with all the rules. If anything, all the rules make it even less likely that we won't have major violations that cost taxpayers and energy customers more money to remedy in the end. In one of my videos, I measured out that the existing corridor is in fact larger than 50 feet in its current state (75 feet in the example.) So who is going to confirm that Duke is measuring and will even ensure that the final result is EXACTLY 100 foot ROW and 50 feet of HTZ, for a total of 150 feet? I suspect they will just add onto the existing corridor, so in that example we'd end up with a 175 foot impacted space. Additionally, how will Duke be kept from exceeding necessary HTZ cutting? In one of my photos it appears that there's already adequate tree progression that resembles an HTZ.

Look... we live in a new world. The scoping for this project was initiated immediately after TS Fred completely remade the Avery Creek, South Mills, and Davidson River drainages that this project impacts. And we're still reeling from the effects of Hurricane Helene. Surveying the damage around the entire region, it's clear that the healthiest and least developed areas of our region (i.e., National Forests, and downstream communities) fared the best. We need trees to hold the water and stop the erosion. In Helene, it was flooding and landslides that took out major electrical substations across the region, not just vegetation hitting power lines. Even with 60 mile per hour winds, I do not believe this powerline corridor was directly impacted (i.e., we had a worst case scenario and the corridor was still intact, even if regional power was impacted outside the corridor). We just can't keep saying "nature is the problem. We have to beat it back." I worry greatly about a wider corridor getting hotter, and drier, in a recreational corridor (i.e., where there are people who can make a mistake), and a wildfire starting easier than it would right now when it's tight and damp. Yes, you might remove some threat of vegetation touching the wires (questionable if this is a real problem, or just purported) and igniting a fire in the current state. But you're trading one threat for another. This corridor has functioned fine and Duke Energy can provide no answer other than "it's hard work" to maintain this corridor. We SHOULD. NOT. CARE. that Duke Energy, a private company, has to work hard to use our land. The most benefit for the most number of people is what our National Forests are supposed to be and the negative environmental, recreational, and economic impacts of this ROW widening only to help Duke. Yes they provide power to thousands of people via this corridor, but the corridor is working as-is. They have been doing their job, and figuring out a way to keep power running to Canton through many worst case scenarios. If they want a more reliable corridor, they can go buy one on private land, or build a new plant, or bury some lines. We have a good compromise right now and it is working. I am not compelled by Duke's reasoning.

In closing, I object and advocate that Alternative 1 - no action - be taken. Or that a full EIS be completed. Anyone who says this will have minimal, impermanent impacts on people like me who use this trail weekly, and live directly downstream of the corridor does not have a real on the ground understanding of the situation. I know my comments bounce between objective and emotional, but that's life. NEPA was designed to ensure both were taken into account and I hope you will consider both.