

**Plaintiffs' Supplemental Comment on Proposed Scope of Environmental
Impact Statement**

Transmission System Vegetation Management Policy

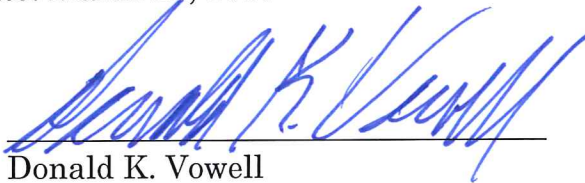
Federal Register, Vol. 82, No. 13, Monday, Jan 23, 2017

**This comment is made by the Plaintiffs in *Sherwood, et al, v. TVA*, and
submitted by their attorney, Donald K. Vowell**

1. With the TVA system already 99.999% reliable, according to TVA's own internal and public relations statements, how could TVA possibly justify supposedly improving that reliability percentage by spending \$170,000,000 or any other vast amount of money to clear the buffer zones and all of the other trees in the right-of-way? Stated another way, how could TVA possibly justify spending that much money to improve reliability by .001%?

2. TVA records indicate that TVA has only been fined by Federal regulators for a vegetation management violation one time in its history, with the fine being \$175,000. That being the case, how could TVA possibly justify clearing its entire right-of-way of trees, at a cost of \$170,000,000 or any other vast amount of money, to avoid similar fines. Stated another way, how could TVA possibly justify spending that much money to supposedly reduce the risk of a similar fine, when the likelihood of such a fine is extremely remote in the first place. (The event leading up to the fine was caused by avoidable employee error or negligence and/or ineffective practices which have now been replaced.)

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Case No. 3:12-CV-00156

United States District Court of the Eastern District of Tennessee