



ATTN: USACE Debris Removal Team, City of Asheville Staff and Consultant

Re: Formal Request to Abandon or Significantly Curtail Debris Removal proposed for Hominy Creek Greenway

*(via email)*

Through an agreement with the City of Asheville, the Friends of Hominy Creek Greenway (FOHCG) maintain and steward the Hominy Creek Greenway corridor through the efforts of an elected board, membership, and community participation. Under the leadership of FOHCG, over 1000 hours of volunteer labor have been invested in the corridor since Hurricane Helene, including community-funded trail resurfacing effort to repair damage to the natural surface trail. Since Helene, the FOHCG have also acquired a \$50,000 grant from the Community Foundation for Western North Carolina to conduct streambank restoration and flood resiliency activities in the corridor, a project which is currently in planning for anticipated construction in Fall 2025. Since its inception, the FOHCG with assistance from Asheville GreenWorks and the community at large have completed various infrastructure development and environmental restoration projects along the corridor with volunteer, grant and other efforts estimated at well over \$500,000.

FOHCG has reviewed plans to access Hominy Creek through City property with their Water Resources Engineer, City staff and FEMA consultant, and the US Army Corps of Engineers' (USACE) contractor, AshBritt. **After careful and thoughtful review, FOHCG is strongly opposed to the proposed access through City of Asheville park property along the Hominy Creek Greenway by the USACE and their contractor AshBritt for the purpose of debris removal, now proposed to commence on Monday, May 5th.** The FOHCG are in favor of, and grateful for, the removal of human-caused and excessive debris from waterways, including natural debris that presents an obvious future flood risk or threat to infrastructure due to its magnitude or location within waterways and watersheds.

The FOHCG were only notified on Thursday May 1st of potential access plans that were to commence as early as Friday May 2nd for the purpose of debris removal. notified due to the presence of new plantings in the potential access area from recent Phase 2 Trail Restoration and Stormwater Resiliency project construction efforts overseen by FOHCG. The FOHCG were not consulted on the scope and scale of proposed debris removal until late Thursday, and the exact intended scope is still unknown, although certain presumed removal targets have been identified via email by AshBritt. It is unclear whether, or to what degree, the City and their FEMA consultant were notified in advance of the proposed scope, scale of proposed activities, and potential access route.

**FOHCG's Water Resources Engineer, who is familiar with construction in rivers and with the corridor, has identified various shortcomings with the current site access plan.** The access that is understood to have been forwarded by AshBritt as their preferred option involves on the order of 1000 linear feet of



impact to the streambed of Hominy Creek and is anticipated to require the removal of stable and pre-existing woody material as well as the creation of a haul road down the center of the creek channel to traverse with debris hauling equipment. The proposed access options near the Sandhill parking entrance also require traversing up and down the riverbank at a location where both sanitary sewer and water mains must be crossed, the latter being shallow (<3') to the ground surface. Alternative access exists through private property on the western side of Hominy Creek which would negate the need to travel heavy equipment through the creek channel, however this option would require additional coordination. **The proposed approach favors the ease of existing access through City property over the extra coordination effort that would be required to manage the effort with a higher degree of environmental stewardship.**

No clear scope of work has been provided to FOHCG. FOHCG are a major stakeholder in this corridor and have site knowledge and ongoing projects that must be considered as part of proposed access and debris removal activities in this corridor. FOHCG acknowledges the authority that the USACE has been granted by the Disaster Declaration and under the mission that they have been engaged to perform by the Federal Emergency Management Agency (FEMA) and local government. **The stated purpose of this work is to remove debris from waterways to restore natural flow and reduce the risk of future flooding** with a focus on risk to infrastructure.

Hominy Creek, through the greenway corridor, is a sandbed stream. Wood is an integral structural component of Hominy Creek, also forming habitat diversity through the corridor. While wood will often shift and migrate within and through the corridor, wood also becomes a stable component of banks and integral to bank stability in the reach. The current wood in the corridor is typical of normal wood loading and influence. Currently, only one debris jam of significance exists in the corridor. Such debris jams have occurred on an annual or similarly regular basis in the corridor and resolve themselves without intervention. No debris jams have been removed from the stream during the City's ownership of the greenway. The current debris jam is judged to be a low concern with respect to bank stability in its current configuration and presents no overarching risk to existing infrastructure or the existing stream buffer.

Based on an evaluation conducted by FOHCG's water resource engineer, whose area of specialization includes stream geomorphology, hydraulics, floodplain management and watershed restoration, **no flood risk currently exists within the corridor** and the volume of wood loading in the corridor is consistent with background conditions and does not pose sufficient downstream risk so as to warrant intervention, particularly given the impacts of such intervention. The Friends has conducted a series of community workdays over the last 6 months to clean up the corridor and also engaged in a trail resurfacing effort to repair damage to the natural surface trail. **The natural flow of Hominy Creek includes moderate to heavy wood influence on flow and habitat.** The current minor debris jam has passed recent elevated flows with no impact to streambanks.



While USACE has publicly condemned over-clearing, limited contractor and oversight personnel training, oversight consistency with staff often coming from out of state and staying for only one month, the lack of engagement with river and biological experts in the region, and contractual terms incentivizing maximum removal of materials have led to violations of the USACE Debris Manual requirements as well as regional best practice recommendations from the North Carolina Wildlife Resources Commission. **The FOHCG is concerned about the removal of any wood beyond the aforementioned debris jam from this corridor.** Nor do we believe that the impact required to remove the debris jam is commensurate with the benefit; we note that such debris jams are normal and self-resolving in the corridor. Furthermore, the FOHCG is committed to ensuring that this debris jam is properly addressed during upcoming future planned construction activities which will provide a suitable opportunity to address any remaining concerns associated with the feature in the fall of 2025.

**We request that plans to remove debris in this corridor be abandoned.** If plans are to proceed in light of our objection, access should be from the opposite end of the corridor off Shelburne Road. The greenway should be traversed to the “beach” area where suitable access from the top of bank to the edge of water can be obtained without the impact and risk of the currently contemplated route and with half of the linear impact to the stream bottom. A dead locust and one other tree would require removal. The cross drainage pipe crossings on the greenway should be protected if possible (with additional cover or plates). **Only the creek-wide debris jam removal is necessary within the allowable scope of debris activities in this corridor and we object to the removal of any other wood or trees, dead or alive, within the corridor.** As stated, most or all hurricane related debris has been removed during community workdays. Photos of current conditions in the corridor are linked below.

Thank you for your attention to and consideration of this request.

Sincerely,

Nancy Benoit, President/Trustee, Friends of Hominy Creek Greenway  
Lewis Lankford, Trustee, Friends of Hominy Creek Greenway  
Jack Igelman, Trustee, Friends of Hominy Creek Greenway  
Tim Watkins, Trustee, Friends of Hominy Creek Greenway  
Holland Youngman, Trustee, Friends of Hominy Creek Greenway  
Emma Castleberry, Trustee, Friends of Hominy Creek Greenway  
Jacob P. McLean, Professional Engineer, Certified Floodplain Manager

Attachments\\ Existing Conditions Photographs (links to online photographs)

[Debris Jam photographs](#)

[Smaller woody debris noted by AshBritt which should be left as stable and/or preexisting](#)

[Other photos of wood and proposed haul route through creek](#)