

Letter of Notification for South Point- Portsmouth 138 kV (Millbrook Park-South Point) Rebuild Project



PUCO Case No. 24-0830-EL-BLN

Submitted to:
The Ohio Power Siting Board
Pursuant to Ohio Administrative Code
Section 4906-6-05

Submitted by:
AEP Ohio Transmission Company, Inc.

September 26, 2024

LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 KV (MILLBROOK PARK-SOUTH POINT) REBUILD PROJECT

The line exhibits conditions similar to those concerns discussed in AEP's presentation to PJM on pre-1930's steel lattice tower lines ("AEP Eastern System Pre-1930s Era Lattice Tower and Transmission Line System", from the December 2019 PJM SRRTEP-Western meeting). Open conditions on the South Point-Portsmouth 138 kV Line were recorded during historical annual aerial inspections, comprehensive ground inspections (last performed in 2019), and a recent unmanned aerial vehicle (UAV) inspection (conducted in January 2024). The most common documented conditions were related to flashover damage, burnt, broken, and chipped insulators. Additional concerns identified during the UAV inspection included corrosion/loss of the galvanizing coating of lattice steel members and ovalization of holes (deterioration of the shape of the connection point) at hanger bar attachment points. Ovalization of holes and rust at the hanger bar connections could lead to failure of the insulator hardware assembly, causing the insulators and conductor to fail and fall to the ground. The rust noted on several components of the steel structures can lead to structural deformation and significantly reduce structural stability, leading to risk of structural collapse.

Lastly, the existing 1930's steel lattice structures fail to comply with current National Electric Safety Code Grade B loading criteria and with current American Society of Civil Engineers structural strength criteria. Present degradation of transmission line components and failure to meet current strength criteria could result in future transmission line outages.

Since 2019, 15 momentary and four permanent outages across three of the four circuits on the South Point – Portsmouth 138 kV Transmission Line (Millbrook Park – South Point 138 kV, Bellefonte – East Wheelersburg 138 kV, and Bellefonte – North Proctorville 138 kV) occurred. Due to the 1930's legacy design, the line itself is inadequately shielded, leaving the overhead conductor more susceptible to lightning strikes. As a result, lightning caused 12 of the 15 momentary outages. Lightning strikes cause flashover damage to insulators as identified in the 2024 UAV inspection. Failure to move forward with the Project will continue to expose customers on the line to outages as the asset continues to deteriorate.

The need and solution for the Project was presented to PJM on 5/20/2019 and 5/22/2020, respectively, and subsequently assigned a PJM identifier s2272. The existing South Point – Portsmouth 138 kV line (Millbrook Park – South Point) is included as planned transmission line in Form FE-T9 of the Company's 2024 Long-Term Forecast Report on page 35 (see Appendix B).

B(3) Project Location

The applicant shall provide the location of the project in relation to existing or proposed lines and substations shown on an area system map of sufficient scale and size to show existing and proposed transmission facilities in the Project area.

The Project is located in Elizabeth Township, Fayette Township, Hamilton Township, Perry Township, Upper Township, and the Village of South Point in Lawrence County and Clay Township, Green Township, Harrison Township, Porter Township, Vernon Township, the Village of New Boston, and the City of Portsmouth in Scioto County, Ohio. Figures 1, 2A-2J, and 3A-3GG in Appendix A show the location of the proposed Project in relation to existing Company facilities, including existing substations and other transmission lines.

LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 KV (MILLBROOK PARK-SOUTH POINT) REBUILD PROJECT

B(4) Alternatives Considered

The applicant shall describe the alternatives considered and reasons why the proposed location or route is best suited for the proposed facility. The discussion shall include, but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.

The goal of selecting a suitable route for the Project was to minimize impacts on land use and natural and cultural resources while avoiding circuitous routes, significantly higher costs, and non-standard design requirements. As such, the majority of the proposed transmission line rebuild work will occur within the Company's existing ROW (see Figures 2A-2J and 3A-3GG in Appendix A) and along the existing transmission centerline. However, approximately 1.3 miles are proposed to be constructed within new ROW due to Project area constraints and encroachments.

The Company conducted an alternatives analysis that included identifying 7 Focus Areas, which are areas along the existing transmission line where rebuilding may not be feasible due to the presence of constraints. Within these 7 Focus Areas, 16 alternative routes were identified (see Figure 4A-4H in Appendix A). Two types of alternative routes were identified: rebuild and reroute. The rebuild alternative routes comprised study segments that will be rebuilt on-centerline. The reroute alternative routes are comprised of the proposed off-centerline study segments in the focus areas. In some focus areas, a single study segment equated to an alternative route, in others multiple study segments were assembled to form an alternative Route. Based on desktop and field examinations, the Company concluded that the Proposed Route, shown on Figure 3A-3GG in Appendix A, was the most suitable route for the Project. The alternative routes selected for the Proposed Route were primarily selected because they avoid residences, outbuildings, and commercial building encroachments within the existing ROW.

The Proposed Route was selected because it utilized the greatest amount practicable of existing ROW, impacted the least number of landowners and parcels, avoided impacts to cultural resources, multi-family dwellings, crossings of interstate highways, railroads, or oil/gas pipelines and designated natural areas, and minimized the amount of tree clearing required within the Wayne National Forest. The Proposed Route is efficient, direct, and represents the most suitable location and most appropriate solution for meeting the Company's needs in the area. Socioeconomic, land use, and ecological information is presented in Section B(10).

B(5) Public Information Program

The applicant shall describe its public information program to inform affected property owners and tenants of the nature of the project and the proposed timeframe for project construction and restoration activities.

The Company will inform affected property owners and tenants about this Project through several different mediums. Within seven days of filing this LON, the Company will issue a public notice in a newspaper of general circulation in the Project area. The notice will comply with all requirements of Ohio Administrative Code ("OAC") Section 4906-6-08(A)(1-6). Further, the Company has mailed (or will mail) a letter, via first class mail, to affected landowners, tenants, and contiguous owners. The letter will comply with all

LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 KV (MILLBROOK PARK-SOUTH POINT) REBUILD PROJECT

requirements of OAC Section 4906-6-08(B). The Company maintains a website (<http://aeptransmission.com/ohio/>) which provides the public access to an electronic copy of this LON. An electronic copy of the LON will be served to the public library in each political subdivision affected by this proposed Project. Lastly, AEP Ohio Transco also retains ROW land agents who discuss project timelines, construction, and restoration activities with affected owners and tenants.

B(6) Construction Schedule

The applicant shall provide an anticipated construction schedule and proposed in-service date of the project.

Construction is planned to start in October 2025 and the anticipated in-service date will be December 2031.

B(7) Area Map

The applicant shall provide a map of at least 1:24,000 scale clearly depicting the facility with clearly marked streets, roads, and highways, and an aerial image.

Appendix A, Figure 2A-2J provides a topographic map with existing and proposed facilities, and clearly marked roads and highways at a scale of 1:24,000 and Figure 3A-3GG provides an aerial map (aerial imagery from 2023) showing roads and highways, clearly marked with Project components, at a scale of 1:7,200. The following U.S. Geological Survey ("USGS") topographic quadrangles are crossed by the Project: Catlettsburg (1985), Ironton (1985), Kitts Hill (1976), Minford (1962), New Boston (1976), Pedro (1976), and Wheelersburg (1985).

To visit the Project from Columbus, merge onto Interstate 71 S, continue for 4.4 miles. Merge onto 270-E, continue for 1.9 miles. Take exit 52 to merge onto US-23 S toward Circleville. Continue on US-23 for 39.9 miles. Take the exit toward State Route 823 and continue for 16.6 miles. Turn right onto US-52 E/Ohio River Scenic Byway and continue for 29.4 miles. Take the Solida Road exit and in 0.2 miles take the 2nd exit in the traffic circle onto Solida Road. Continue for 0.3 miles and then turn left onto N Kenova Road. South Point Station will be straight ahead in approximately 0.5 miles.

B(8) Property Agreements

The applicant shall provide a list of properties for which the applicant has obtained easements, options, and/or land use agreements necessary to construct and operate the facility and a list of the additional properties for which such agreements have not been obtained.

The Project will primarily be constructed within existing ROW. However, portions of the Project will be constructed outside of the existing ROW. A table of property parcel numbers and road crossing names with an indication as to whether the easement/option necessary to construct and operate the facility has been obtained is provided in Appendix C. Appendix C also contains the easement form for the Project, which represents the minimum easement rights the Company would require in order to construct, operate, and maintain these facilities.

LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 KV (MILLBROOK PARK-SOUTH POINT) REBUILD PROJECT

B(9) Technical Features

The applicant shall describe the following information regarding the technical features of the project:

B(9)(a) Operating characteristics, estimated number and types of structures required, and right-of-way and/or land requirements.

The transmission line construction will include the following:

Voltage: 138 kV
Conductors: (6) 795 KCM (26/7) ACSR “Drake”
Static Wire: (1) 7#8 Alumoweld
(1) 96 fiber OPGW
Insulators: Non-ceramic
ROW Width: 100 Feet (primary ROW width)
100 - 200 Feet (varying by individual spans, see Map 3 in Appendix A)
Structure Type: Twenty Six (26) double circuit, steel monopole dead-ends
One Hundred Twenty Seven (127) double circuit, steel monopole suspension
Three (3) double circuit, steel 3 pole dead-ends
Four (4) double circuit, steel 2 pole dead-ends

B(9)(b) Electric and Magnetic Fields

For electric power transmission lines that are within one hundred feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line.

The existing transmission line is located within 100 feet of 41 occupied residences. However, the proposed transmission centerline for the Project reduces the number of residences within 100 feet to 38 occupied residences.

(i) Calculated Electric and Magnetic Field Strength Levels

Three loading conditions were examined: (1) Normal Maximum Loading, (2) Emergency Loading, and (3) Winter Normal Conductor Rating, consistent with the OPSB requirements. Normal Maximum Loading represents the peak flow expected with all system facilities in service; daily/hourly flows fluctuate below this level. Emergency loading is the maximum current flow during unusual (contingency) conditions, which exist only for short periods of time. Winter normal (WN) conductor rating represents the maximum current flow that a line, including its terminal equipment, can carry during winter conditions. It is not anticipated that this circuit of line would operate at its WN rating in the foreseeable future.

LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 kV (MILLBROOK PARK-SOUTH POINT) REBUILD PROJECT

EMF levels were computed one meter above ground under the line and at the ROW edges (50/50 feet, left/right, of centerline). The results, calculated using Electric Power Research Institute's ("EPRI's") EMF Workstation 2015 software, are summarized below.

Millbrook Park-Dogwood Ridge 138 kV Line Circuit 1/Circuit 2					
Condition	Load (A)	Phasing Arrangements	Ground Clearance (feet)	Electric Field (kV/m)*	Magnetic Field (mG)*
(1) Normal Max. Loading[^]	148.7/148.7	A-B-C / A-B-C	34.9/34.9	(0.27/1.85/0.27)	(10.68/20.13/10.68)
(2) Emergency Line Loading^{^^}	226.19/226.19	A-B-C / A-B-C	30.0/30.0	(0.27/1.85/0.27)	(16.24/30.62/16.24)
(3) Winter Conductor Rating^{^^^}	102.62/102.62	A-B-C / A-B-C	34.9/34.9	(0.27/1.85/0.27)	(7.37/13.89/7.37)
Dogwood Ridge-East Wheelersburg 138 kV Line Circuit 1/Circuit 2					
Condition	Load (A)	Phasing Arrangements	Ground Clearance (feet)	Electric Field (kV/m)*	Magnetic Field (mG)*
(1) Normal Max. Loading[^]	148.7/148.7	A-B-C / A-B-C	33.3/33.3	(0.26/1.87/0.26)	(10.73/20.31/10.73)
(2) Emergency Line Loading^{^^}	226.19/226.19	A-B-C / A-B-C	31.2/31.2	(0.25/2.0/0.25)	(17.03/33.16/17.03)
(3) Winter Conductor Rating^{^^^}	102.62/102.62	A-B-C / A-B-C	33.3/33.3	(0.26/1.87/0.26)	(7.41/14.01/7.41)
East Wheelersburg-South Point 138 kV Line Circuit 1/ Circuit 2					
Condition	Load (A)	Phasing Arrangements	Ground Clearance (feet)	Electric Field (kV/m)*	Magnetic Field (mG)*
(1) Normal Max. Loading[^]	148.7/148.7	A-B-C / A-B-C	33.4/33.4	(0.25/2.03/0.25)	(11.44/22.87/11.44)
(2) Emergency Line Loading^{^^}	226.19/226.19	A-B-C / A-B-C	25.0/25.0	(0.25/2.03/0.25)	(17.41/34.79/17.41)
(3) Winter Conductor Rating^{^^^}	102.62/102.62	A-B-C / A-B-C	33.4/33.4	(0.25/2.03/0.25)	(7.9/15.79/7.9)

*EMF levels (left ROW edge/maximum/right ROW edge) computed one meter above ground at the point of minimum ground clearance, assuming balanced phase currents and 1.0 P.U. Voltages. ROW width is 50 feet (left) and 50 feet (right) of centerline, respectively.

[^]Peak line flow expected with all system facilities in service.

^{^^}Maximum flow during a critical system contingency

^{^^^}Maximum continuous flow that the line, including its terminal equipment, can withstand during winter conditions.

For power-frequency EMF, IEEE Standard C95.6TM-2002 recommends the following limits:

	General Public	Controlled Environment
Electric Field Limit (kV/m)	5.0	20.0
Magnetic Field Limit (mG)	9,040	27,100

LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 KV (MILLBROOK PARK-SOUTH POINT) REBUILD PROJECT

The above EMF levels are well within the limits specified in IEEE Standard C95.6TM-2002. Those limits have been established to "prevent harmful effects in human beings exposed to electromagnetic fields in the frequency range of 0-3 kHz."

B(9)(b)(ii) Design Alternatives

A discussion of the applicant's consideration of design alternatives with respect to electric and magnetic fields and their strength levels, including alternate conductor configuration and phasing, tower height, corridor location, and right-of-way width.

Design alternatives were not considered due to the EMF strength levels. Transmission lines, when energized, generate EMF. Laboratory studies have failed to establish a strong correlation between exposure to EMF and effects on human health. However, some people are concerned that EMF have impacts on human health. Due to these concerns, EMF associated with the new circuits was calculated and set forth in the table above. The EMF was computed assuming the highest possible EMF values that could exist along the proposed transmission line. Normal daily EMF levels will operate below these maximum load conditions. Based on studies from the National Institutes of Health, the magnetic field (measured in milliGauss, or mG) associated with emergency loading at the highest EMF value for this transmission line is lower than those associated with normal household appliances like microwaves, electric shavers and hair dryers. For additional information regarding EMF, the National Institutes of Health has posted information on their website: <http://www.niehs.nih.gov/health/topics/agents/emf/>. Additionally, information on electric and magnetic fields is available on AEP Ohio's website: <https://www.aepohio.com/info/projects/emf/OurPosition.aspx>. The information found on AEP Ohio's website describes the basics of electromagnetic field theory, scientific research activities, and EMF exposures encountered in everyday life. Similar material will be made available for those affected by the construction activities for this Project.

B(9)(c) Project Cost

The estimated capital cost of the project.

The cost estimate for the proposed Project, which is comprised of applicable tangible and capital costs, is approximately \$110,700,000 based on a Class 4 estimate. Pursuant to the PJM Open Access Transmission Tariff ("OATT"), the costs for this Project will be recovered in the Company's Federal Energy Regulatory Commission ("FERC") formula rate (Attachment H-20 to the PJM OATT) and allocated to the AEP Zone.

B(10) Social and Economic Impacts

The applicant shall describe the social and ecological impacts of the project:

B(10)(a) Land Use Characteristics

Provide a brief, general description of land use within the vicinity of the proposed project, including a list of municipalities, townships, and counties affected.

LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 KV (MILLBROOK PARK-SOUTH POINT) REBUILD PROJECT

The Project is located within Elizabeth Township, Fayette Township, Hamilton Township, Perry Township, Upper Township, and the Village of South Point in Lawrence County and Clay Township, Green Township, Harrison Township, Porter Township, Vernon Township, the Village of New Boston, and the City of Portsmouth in Scioto County, Ohio. Field observations by the Company's consultant indicated that the Project area is comprised primarily of early successional deciduous forest, second growth deciduous forest, old field, maintained lawn, agricultural field, and pasture habitats. Industrial land, existing paved/gravel roadway, hayfield, commercial land, existing railroad, palustrine emergent wetland, palustrine scrub-shrub wetland, palustrine forested wetland, and clearcut land habitats are present to a lesser extent (see Figure 3 in the Ecological Survey Reports included in Appendix E). The Ecological Survey Reports included in Appendix E also contain photographs and descriptions of specific habitat types and land uses within the Project area. Residential development is primarily located in the northern, central, and southern portions of the Project area and near the towns of Wheelersburg, Portsmouth, New Boston, and South Point. The remainder of the Project area is heavily forested with scattered agricultural fields, old fields, pastures, and maintained lawns present throughout the Project area within non-forested areas.

There are four designated places of worship and four cemeteries located within 1,000 feet of the proposed centerline of the Project. There are no parks, schools, wildlife management areas, or nature preserve lands within 1,000 feet of the Project area. Portions of the Project area are located within the Wayne National Forest, which is also crossed by the existing transmission line. In addition to Wayne National Forest, there are two non-protected/private owned conservation sites (Little Ice Creek Conservation Site and Possum Hollow Conservation Site) located within 1,000 feet of the proposed centerline of the Project.

The Project ROW consists of approximately 491 acres, with approximately 374 acres of tree clearing required for the Project.

B(10)(b) Agricultural Land Information

Provide the acreage and a general description of all agricultural land, and separately all agricultural district land, existing at least sixty days prior to submission of the application within the potential disturbance area of the project.

Based on field survey observations by the Company's consultant, there are approximately 53.3 acres of agricultural land located within the existing and proposed ROW (14.4 acres of agricultural field; 2.6 acres of hayfield; 36.3 acres of pasture; see Figure 3 in the Ecological Survey Reports included in Appendix E). As verified by the Lawrence County Auditor's office on August 21, 2024, there are no landowner parcels within the Lawrence County portion of the Project that are enrolled in the Agricultural District Land program. As verified by the Scioto County Auditor's office on August 23, 2024, the Project contains three landowner parcels in Scioto County that are enrolled in the Agricultural District Land program. These include the following tax parcel numbers: 17-0222.000; 17-0698.000; and 17-0698.002. These three parcels are also crossed by the existing transmission line ROW. A total of 9.6 acres of Agricultural District Land will be crossed by the proposed ROW. It is anticipated that only the small footprint of the proposed pole locations along the proposed route will be converted from agricultural use as a result of the Project.

B(10)(c) Archaeological and Cultural Resources

LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 KV (MILLBROOK PARK-SOUTH POINT) REBUILD PROJECT

Provide a description of the applicant's investigation concerning the presence or absence of significant archaeological or cultural resources that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

Phase I Archaeological and Phase I History/Architectural surveys were completed by the Company's consultant from 2021 through 2024. Similarly, cultural resources survey reports for the Project were completed by the Company's consultant between April 2021 and June 2024. These reports were reviewed by the Ohio History Connection ("OHC") State Historic Preservation Office ("SHPO"). There are no National Register of Historic Places ("NRHP")-listed architectural resources, national historic landmarks, or NRHP-listed historic districts within one mile of the existing or proposed centerline. Additionally, there are no NRHP-listed or eligible archaeological sites within the existing or proposed ROW. One architectural resource aged 50 years old or older was identified within the Area of Potential Effects for the Project and was recommended by the Company's consultant and the SHPO as eligible for NRHP listing. However, the SHPO stated that while the Project area may be visible from the NRHP-eligible resource, the nature of the Project only upgrades the existing transmission line. Therefore, the SHPO concurred that the work as proposed should have no adverse effect on this resource. Additional cultural resources work was not recommended by the Company's consultant or the SHPO and no adverse effects on historic properties are anticipated. Copies of the SHPO correspondence letters received between 2021 and 2024 are included in Appendix D.

B(10)(d) Local, State, and Federal Agency Correspondence

Provide a list of the local, state, and federal governmental agencies known to have requirements that must be met in connection with the construction of the project, and a list of documents that have been or are being filed with those agencies in connection with siting and constructing the project.

A Notice of Intent (NOI) will be filed with the Ohio Environmental Protection Agency for authorization of construction storm water discharges under General Permit OHC000006, and AEP Ohio Transco will implement and maintain best management practices as outlined in the project-specific Storm Water Pollution Prevention Plan to minimize erosion and sediment to protect surface water quality during storm events.

The Federal Emergency Management Agency ("FEMA") Flood Insurance Rate Maps were consulted to identify any floodplains/flood hazard areas that have been mapped in the Project area (specifically, map numbers 39079C0325K, 39087C0241D, 39087C0100E, 39087C0125E, 39087C0230E, 39087C0235E, 39087C0242E, 39087C0265E, 39087C0244E, 39087C0354D, 39087C0351E, 39087C0352E, 39087C0362E, 39087C0353D, 39145C0430E, 39145C0435E, 39145C0290E, 39145C0445E, 39145C0288E, 39145C0267E, 39145C0465E, 39145C0555E, 39145C0269F, and 39145C0268F). Based on these maps, mapped FEMA floodplains are located within the Lawrence County and Scioto County portions of the Project area. Six existing structures are located within FEMA mapped floodplains and will be replaced by six new structures within FEMA mapped floodplains. Therefore, a Special Flood Hazard Area Development Permit may be required from the Lawrence County Floodplain Administrator and/or Scioto County Floodplain Administrator for this Project. If required, the Company will obtain these permits prior

LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 KV (MILLBROOK PARK-SOUTH POINT) REBUILD PROJECT

The ODNR response letters stated that the Project area is within the range of 23 state-listed threatened and endangered mussel species and portions of the Project area are located within one mile of known records of the state species of concern salamander mussel (*Simpsonaias ambigua*) and deertoie (*Truncilla truncata*), as well as the state-listed threatened black sandshell (*Ligumia recta*) and little spectaclecase (*Villosa lienosa*). The ODNR stated that Project must not have an impact on native freshwater mussels at the Project site. If in-water work is planned in any streams that meet the criteria outlined in the Ohio Mussel Survey Protocol (ODNR and USFWS 2020), the ODNR recommends mussel surveys or mussel reconnaissance surveys be conducted and the ODNR recommends that the applicant provide information to indicate no mussel impacts will occur. No in-water work will take place in perennial streams as part of the Project. Therefore, no impacts to mussels are anticipated.

The ODNR response letter stated the Project area is within the range of 16 state-listed threatened and endangered fish species and portions of the Project area are located within one mile of known records of the state listed threatened channel darter (*Percina copelandi*) and river darter (*Percina shumardi*), as well as the state-listed endangered shoal chub (*Macrhybopsis hyostoma*). The ODNR recommends no in-water work in perennial streams from March 15 through June 30 to reduce impacts to these fish species and their habitat. If no in-water work is proposed in a perennial stream, the ODNR stated that the Project is not likely to impact these state-listed fish species.

The ODNR response letter stated that portions of the Project area are located within the range of the timber rattlesnake (*Crotalus horridus*; state-listed endangered and federal species of concern), green salamander (*Aneides aeneus*; state-listed endangered), and eastern spadefoot (*Scaphiopus holbrookii*; state-listed endangered). Therefore, the ODNR recommended that an approved herpetologist conduct a habitat suitability survey to determine if suitable habitat for these species is present within the Project area. Therefore, the Company engaged an ODNR-approved herpetologists to complete timber rattlesnake, green salamander, and eastern spadefoot habitat suitability surveys and reports for applicable portions of the Project in May of 2023. Suitable timber rattlesnake habitat was identified within only the Wayne National Forest portion of the Project. No suitable eastern spadefoot habitat was identified within the Project area. Potentially suitable green salamander habitat was only identified as being present within one rock outcropping located within the Ironwood Switch-Structure 26 portion of the Project and the ODNR-approved herpetologist completed presence/absence surveys for this species within the area of potentially suitable habitat in October of 2023. No green salamanders were observed. Correspondence submitted to and received from the ODNR regarding the timber rattlesnake, eastern spadefoot, green salamander and the Project is provided in Appendix D.

The ODNR response letters stated that portions of the Project is within the range of the midland mud salamander (*Pseudotriton montanus diastictus*; state-listed threatened) and the eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*; state-listed endangered and federal species of concern). The ODNR stated that, due to the location, the Project is not likely to impact these species. The ODNR response letter for the Millbrook Park-East Wheelersburg section of the Project stated that this section of the Project is located within the range of the Allegheny woodrat (*Neotoma magister*), a state endangered species. The ODNR stated that due to the location, the type of habitat within that section of the Project area, and the type of work proposed, this project is not likely to impact this species.

LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 KV (MILLBROOK PARK-SOUTH POINT) REBUILD PROJECT

The ODNR response letters also stated that the Project is located within one mile of known records of several state listed threatened, endangered, and potentially threatened plant species and recommended that the Company contact the ODNR Division of Natural Areas and Preserves' Chief Botanist Rick Gardner for survey coordination. Therefore, the Company contacted Rick Gardner on April 21, 2023 to discuss his recommendations regarding the need for species-specific surveys for any of the plant species known to occur within one mile of the Project area. Mr. Gardner stated that there are known occurrences of gray beard-tongue (*Penstemon canescens*; state-listed threatened) within the vicinity of sections of the Ironwood Switch-Structure 26 and Structure 26-South Point portions of the Project and recommended pre-construction surveys for this species take place for this species within the areas where the known occurrences of this species are located. Therefore, the Company's consultant conducted surveys for this species in June of 2023 within the applicable areas. No gray beard-tongue individuals or populations were observed. Additionally, the Company's consultant completed surveys for U.S. Forest Service (USFS) sensitive plant species within the Wayne National Forest portion of the Project in June of 2023. During these surveys, several individuals and populations of three state-listed endangered, threatened, and potentially threatened plant species were identified, including bushy broom-sedge (*Andropogon glomeratus*; state-listed endangered), dwarf violet iris (*Iris verna*; state-listed threatened), and eastern featherbells (*Stenanthium graminium*; state-listed potentially threatened). Each of these species is currently on the list of plant species recommended to be removed from the list of USFS sensitive plants. The results of gray beard-tongue surveys within the Structure 26-South Point portion of the Project will be provided to Mr. Gardner. Additionally, the results of the gray-beardtongue and USFS sensitive plant species surveys within the Wayne National Forest portion of the Project will be provided to Mr. Gardner and the USFS for further recommendations.

As stated, Table 5 or Table 6 in each of the four Ecological Survey Reports included in Appendix E provides a habitat assessment and potential impacts summary for each of the threatened, endangered, and rare wildlife and plant species mentioned in the correspondence received from the USFWS and/or ODNR (Appendix D). The table provided below includes a summary of remaining avoidance and minimization measures committed to by the Company during construction of the Project.

Common Name	Status	Applicable Portion(s) of Project	Avoidance Dates	Action to Avoid Impacts
Indiana bat	Federally Endangered; State-listed Endangered	Entire Project	April 1 - September 30; March 16 - November 14	Avoid tree clearing between March 31 and October 1 or March 15 to November 15, as applicable within specific project sections.
Northern long-eared bat	Federally Endangered; State-listed Endangered	Entire Project	April 1 - September 30; March 16 - November 14	Avoid tree clearing between March 31 and October 1 or

LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 KV (MILLBROOK PARK-SOUTH POINT) REBUILD PROJECT

Common Name	Status	Applicable Portion(s) of Project	Avoidance Dates	Action to Avoid Impacts
				March 15 to November 15, as applicable within specific project sections.
Tricolored bat	Proposed Federally Endangered; State-listed Endangered	Entire Project and Opening 9 within Ironwood Switch - Structure 26 portion of Project	April 1 - September 30	Avoid tree clearing between March 31 and October 1. Before clearing trees within vicinity of Opening 9, have permitted bat biologist search Opening 9 for tricolored bats. If found, coordinate with ODNR before clearing trees within vicinity of Opening 9.
Little brown bat	State-listed Endangered	Entire Project	April 1 - September 30	Avoid tree clearing between March 31 and October 1.
Timber rattlesnake	State-listed Endangered	Wayne National Forest portion of Project	April 15 - November 1	Have ODNR-approved herpetologist conduct monitoring for timber rattlesnakes if construction takes place from April 15 to November 1.
Bushy broom-sedge	State-listed Endangered	Wayne National Forest portion of Project	Not Applicable	Coordinate with ODNR to determine applicable avoidance and minimization
Dwarf violet iris	State-listed Threatened	Wayne National Forest portion of Project	Not Applicable	

LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 KV (MILLBROOK PARK-SOUTH POINT) REBUILD PROJECT

Common Name	Status	Applicable Portion(s) of Project	Avoidance Dates	Action to Avoid Impacts
Eastern featherbells	State-listed Potentially Threatened	Wayne National Forest portion of Project	Not Applicable	measures during construction in areas where these plant populations were identified.

According to the ODNR environmental review request response letters, a search for unique ecological sites, scenic rivers, state nature preserves, wildlife areas, national wildlife refuges, parks, state or national forests, and other protected natural areas indicates that the following sites occur within or adjacent to the Project area: Wayne National Forest - Ironton District, Little Ice Creek Conservation Site, and Possum Hollow Conservation Site. A Conservation Site is an area deemed by the ODNR Natural Heritage Database to be a high quality natural area not currently under formal protection. It may, for example, harbor one or more rare species, be an outstanding example of a plant community or have geologically significant features, etc. Additionally, the ODNR stated that the following are known from within one mile of the Ironwood Switch-Structure 26 portion of the Project area: natural arch or bridge, Appalachian oak forest plant community, floodplain forest plant community, and mixed mesophytic forest plant community.

B(10)(f) Areas of Ecological Concern

Provide a description of the applicant's investigation concerning the presence or absence of areas of ecological concern (including national and state forests and parks, floodplains, wetlands, designated or proposed wilderness areas, national and state wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, and wildlife sanctuaries) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the Project area (Appendix D). The existing transmission line currently crosses the Wayne National Forest, as well as the proposed transmission line. Other than the Wayne National Forest, the ODNR response letters stated that no records of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state forests, national wildlife refuges, or other protected natural areas occur within the Project area (Appendix D).

Ecological Survey Reports were completed by the Company's consultant in July of 2023 and May of 2024 (Appendix E). During the ecological field surveys, 36 palustrine emergent wetlands, one palustrine scrub-shrub wetland, one palustrine forested wetland, 126 ephemeral streams, 90 intermittent streams, and 22 perennial streams were identified within the Project area. See Appendix E for more information regarding these aquatic resources. No existing structures are currently located within wetlands and none of the proposed new structures will be installed within wetlands as part of the Project. Several wetlands will be temporarily impacted by timber mat access roads and/or by timber mat structure workspaces. The

LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 KV (MILLBROOK PARK-SOUTH POINT) REBUILD PROJECT

remaining wetlands within the Project area will be avoided. No structures or culverts for access roads are proposed within streams. Streams will either be avoided or crossed using timber mat bridges/air bridges.

The Federal Emergency Management Agency (“FEMA”) Flood Insurance Rate Maps were consulted to identify any floodplains/flood hazard areas that have been mapped in the Project area (specifically, map numbers 39079C0325K, 39087C0241D, 39087C0100E, 39087C0125E, 39087C0230E, 39087C0235E, 39087C0242E, 39087C0265E, 39087C0244E, 39087C0354D, 39087C0351E, 39087C0352E, 39087C0362E, 39087C0353D, 39145C0430E, 39145C0435E, 39145C0290E, 39145C0445E, 39145C0288E, 39145C0267E, 39145C0465E, 39145C0555E, 39145C0269F, and 39145C0268F). Based on these maps, FEMA floodplains are located within the Lawrence County and Scioto County portions of the Project area. Six existing structures are located within FEMA mapped floodplains and will be replaced by six new structures within FEMA mapped floodplains.

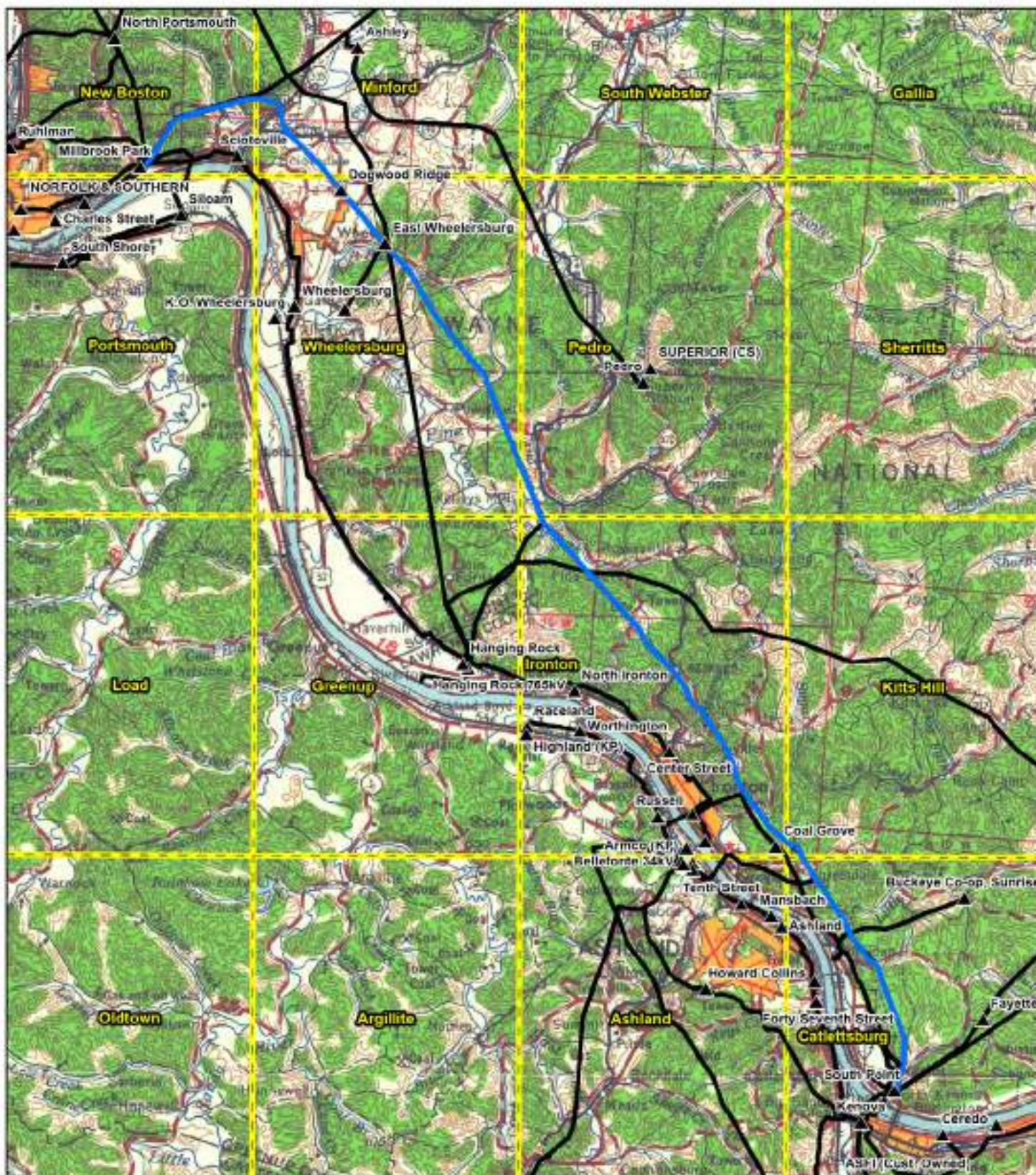
B(10)(g) Unusual Conditions

Provide any known additional information that will describe any unusual conditions resulting in significant environmental, social, health, or safety impacts.

To the best of the Company’s knowledge, no unusual conditions exist that would result in significant environmental, social, health, or safety impacts.

**LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 KV (MILLBROOK PARK-
SOUTH POINT) REBUILD PROJECT**

Appendix A Project Maps



- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- USGS 7.5' Topographic Lines

Data Sources: AEP, USGS
1:250,000 Topographic
Quadrangles, HIFLD,
Pennwell

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



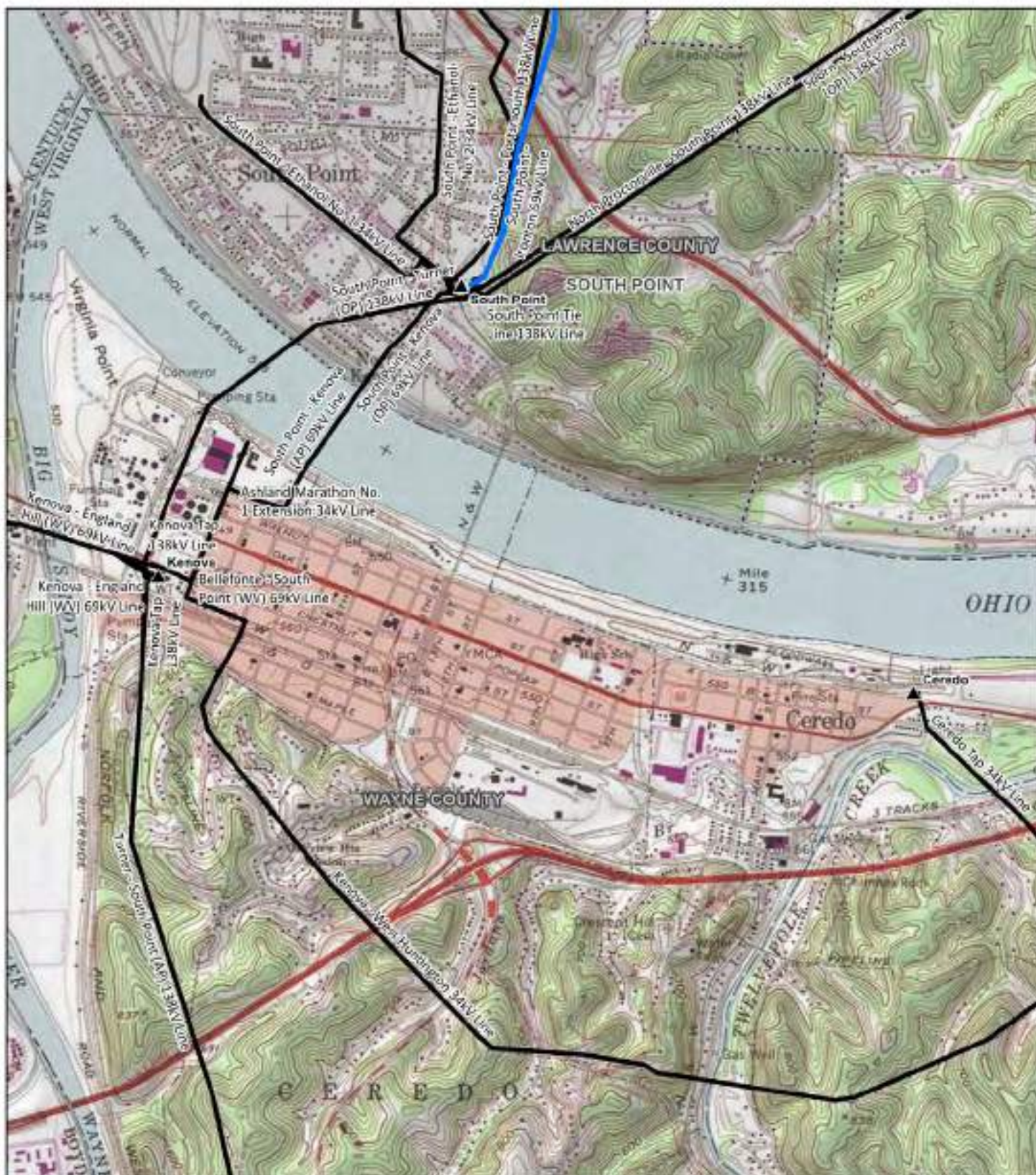
September 24, 2024



FIGURE 1 TOPOGRAPHIC OVERVIEW

South Point-Portsmouth 138kV
(Millbrook Park-South Point)
Rebuild Project

0 0.88 1.75 2.63 3.5
Miles



- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- USGS 7.5' Topographic Lines
- Municipal Boundary

Data Sources: AEP, USGS 7.5'
Topographic Quadrangles,
HIFLD, Pennwell

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet

September 24, 2024



FIGURE 2A TOPOGRAPHIC MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project

0 1,000 2,000
Feet



- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- USGS 7.5' Topographic Lines
- Municipal Boundary

Data Sources: AEP, USGS 7.5'
Topographic Quadrangles,
HIFLD, Pennwell

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet

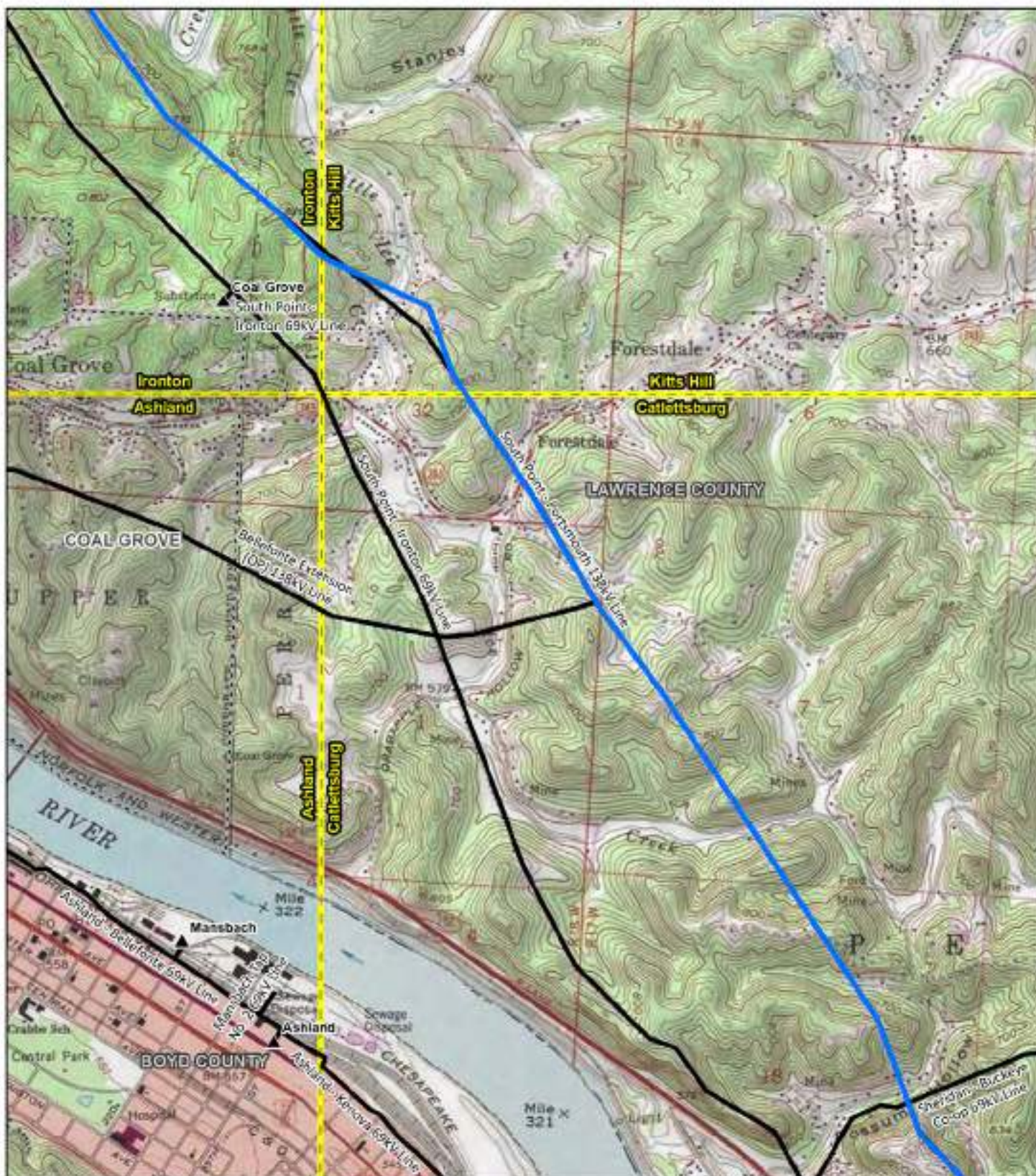


FIGURE 2B TOPOGRAPHIC MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project

0 1,000 2,000
Feet



- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- USGS 7.5' Topographic Lines
- Municipal Boundary

Data Sources: AEP, USGS 7.5' Topographic Quadrangles, HIFLD, Pennwell

Coordinate System and Datum
NAD 83 State Plane
Ohio South, Feet

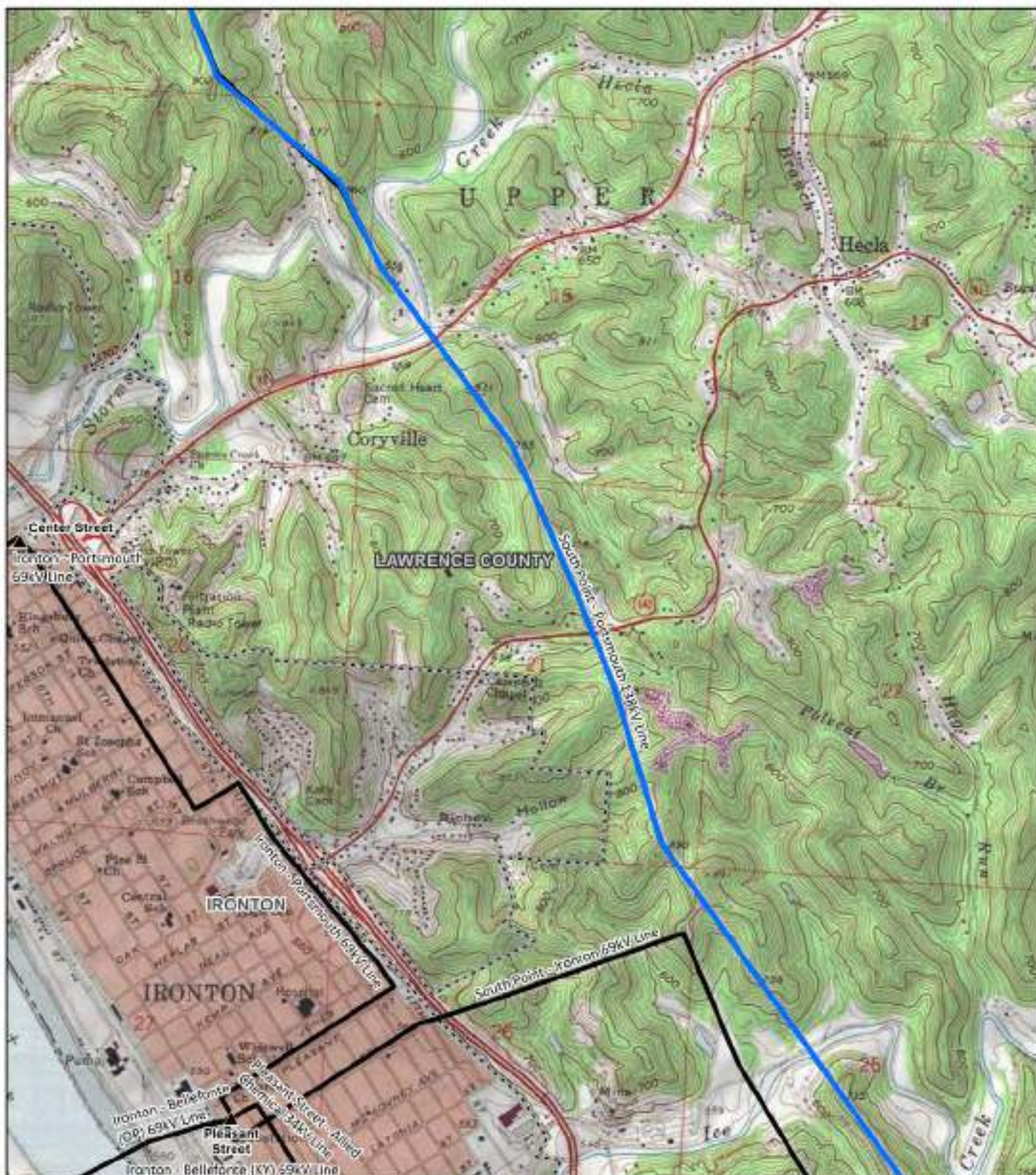


FIGURE 2C TOPOGRAPHIC MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project

0 1,000 2,000
Feet



- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- USGS 7.5' Topographic Lines
- Municipal Boundary

Data Sources: AEP, USGS 7.5'
Topographic Quadrangles,
HIFLD, Pennwell

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



September 24, 2024

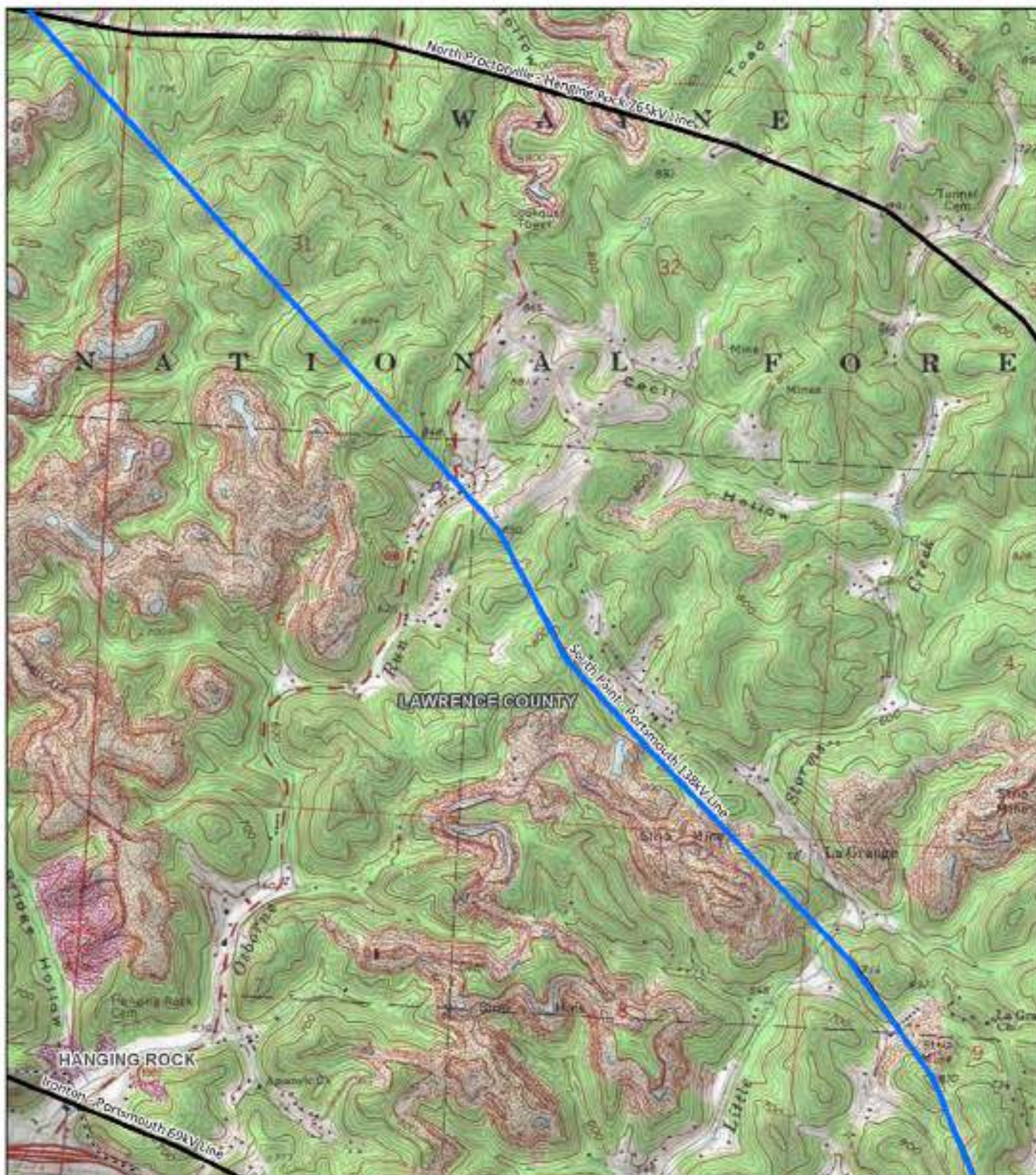


FIGURE 2D TOPOGRAPHIC MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project

0 1,000 2,000
Feet



- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- USGS 7.5' Topographic Lines
- Municipal Boundary

Data Sources: AEP, USGS 7.5'
Topographic Quadrangles,
HIFLD, Pennwell

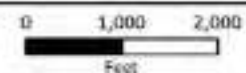
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet

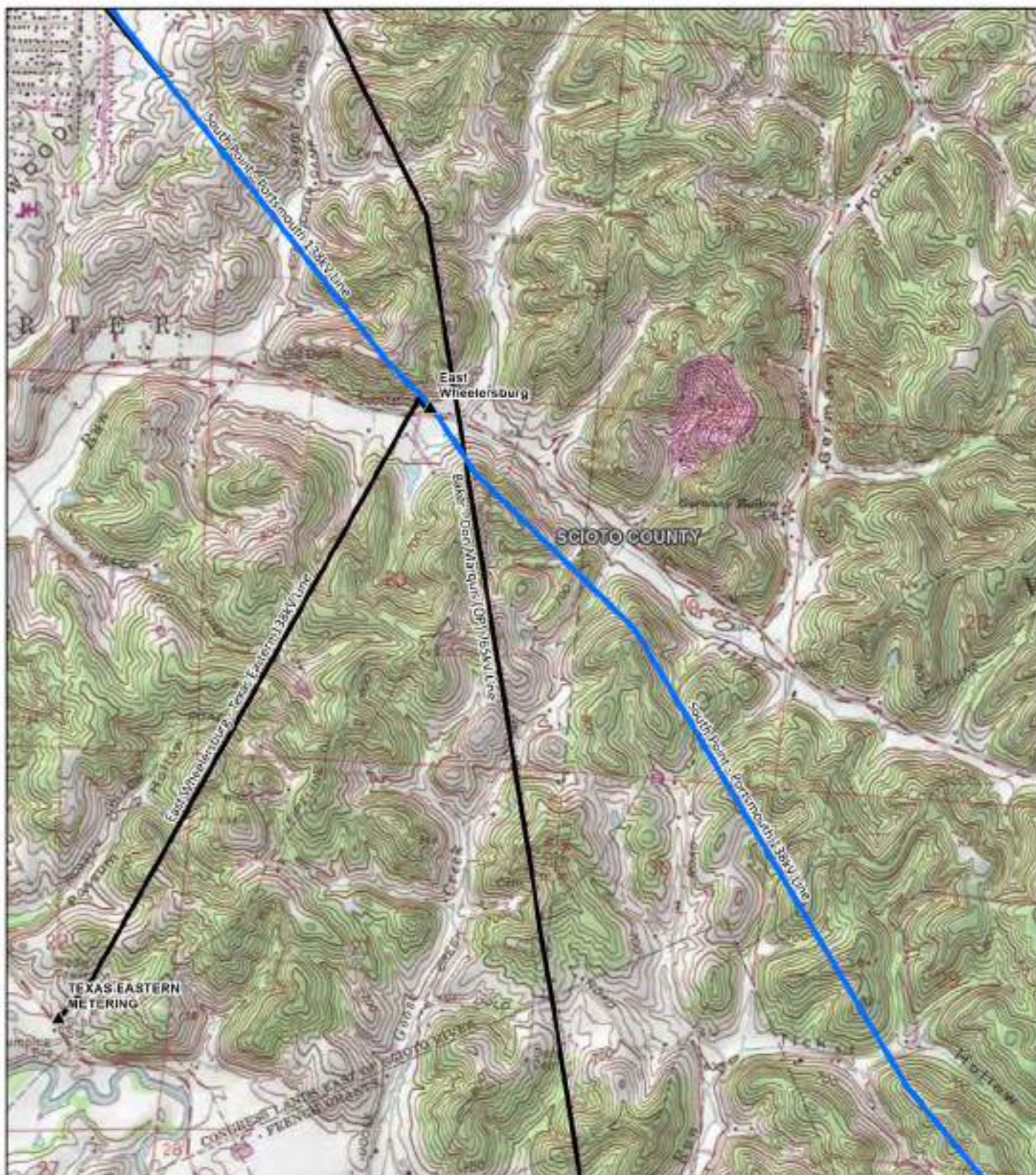


FIGURE 2E TOPOGRAPHIC MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- USGS 7.5' Topographic Lines
- Municipal Boundary

Data Sources: AEP, USGS 7.5'
Topographic Quadrangles,
HIFLD, Pennwell

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



FIGURE 2H TOPOGRAPHIC MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project

0 1,000 2,000
Feet



- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- USGS 7.5' Topographic Lines
- Municipal Boundary

Data Sources: AEP, USGS 7.5'
Topographic Quadrangles,
HIFLD, Pennwell

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



September 24, 2024



FIGURE 21
TOPOGRAPHIC MAP



South Point-Portsmouth 138kV
(Millbrook Park-South Point)
Rebuild Project

0 1,000 2,000
Feet



- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- USGS 7.5' Topographic Lines
- ▭ Municipal Boundary

Data Sources: AEP, USGS 7.5'
Topographic Quadrangles,
HIFLD, Pennwell

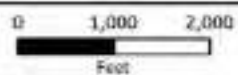
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet

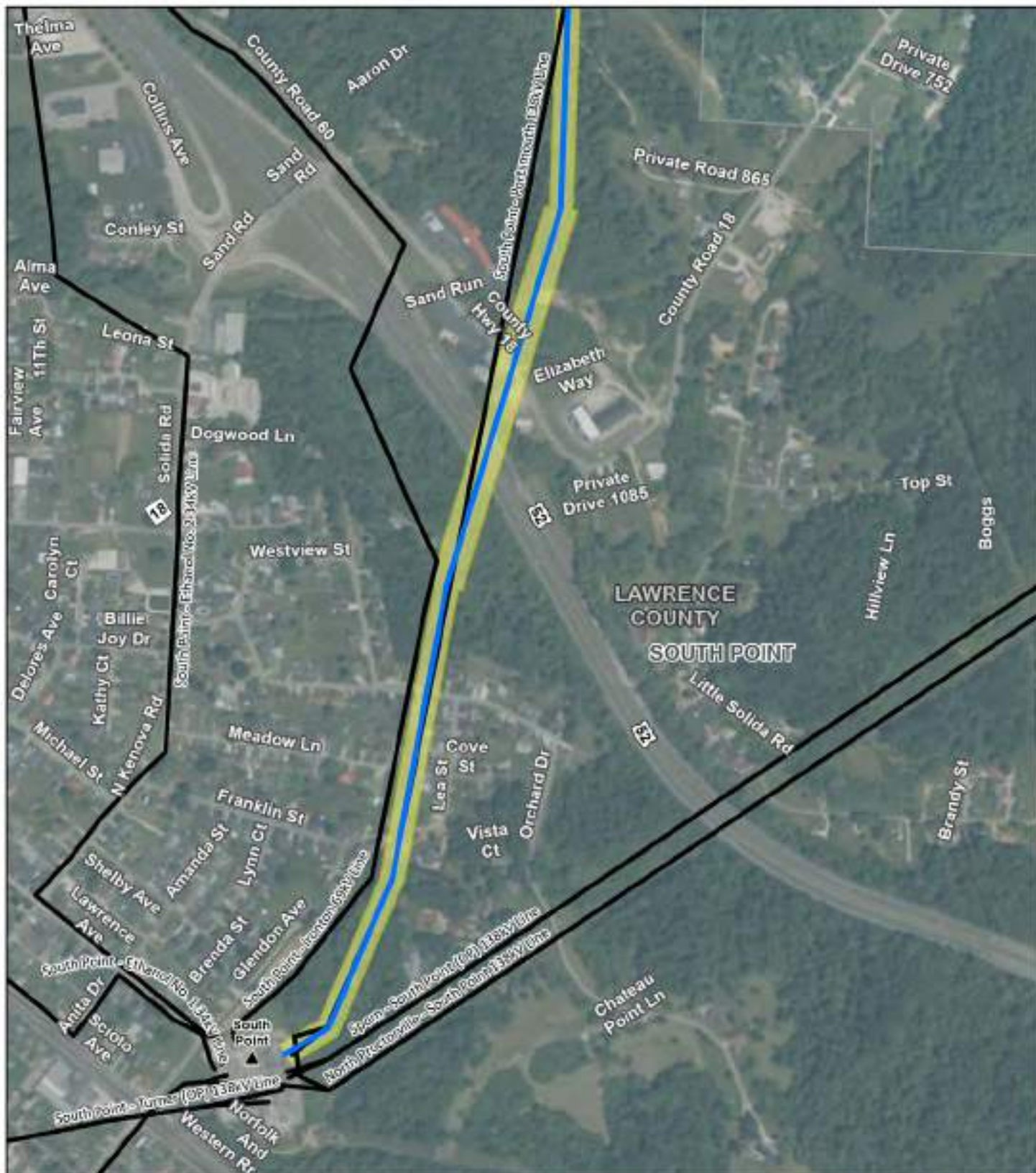


FIGURE 2J
TOPOGRAPHIC MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⛔ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

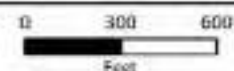
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet

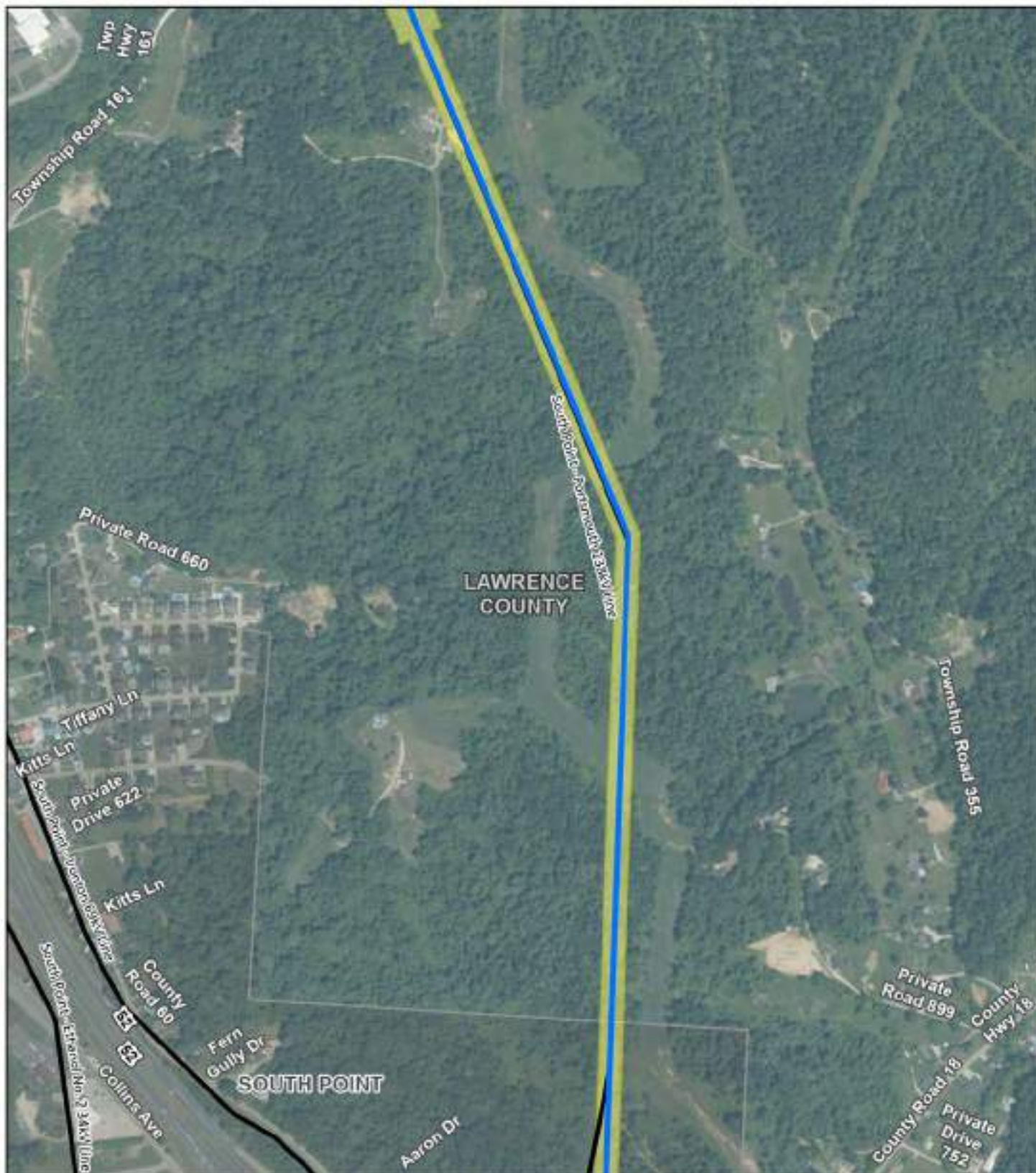


**FIGURE 3A
AERIAL MAP**



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

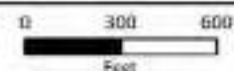
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



**FIGURE 3B
AERIAL MAP**



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



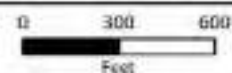
September 24, 2024

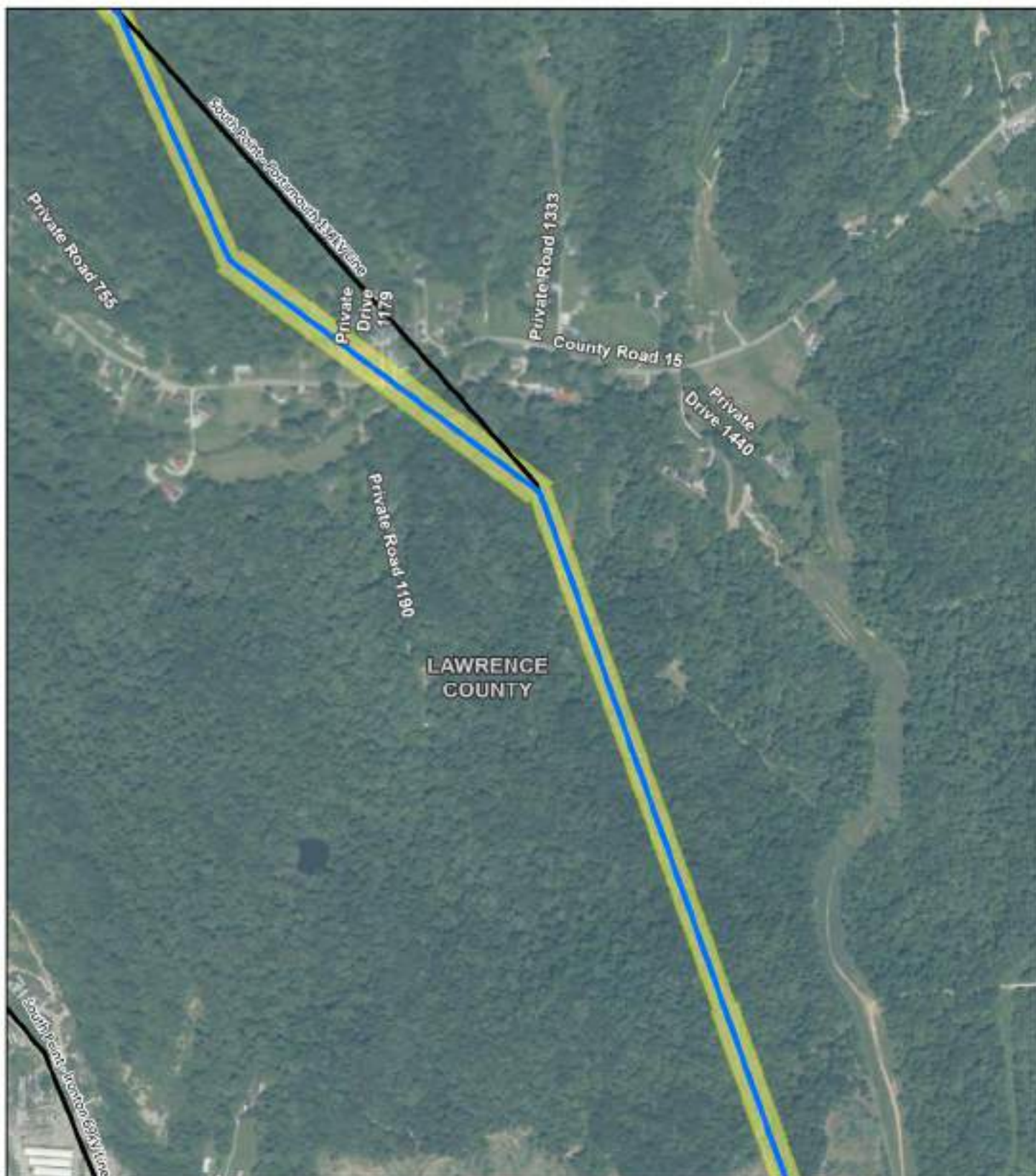


FIGURE 3C AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⚰ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

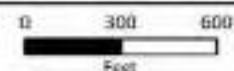
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



FIGURE 3D AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



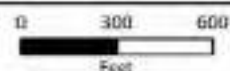
September 24, 2024



FIGURE 3E AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

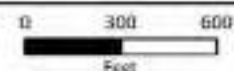
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet

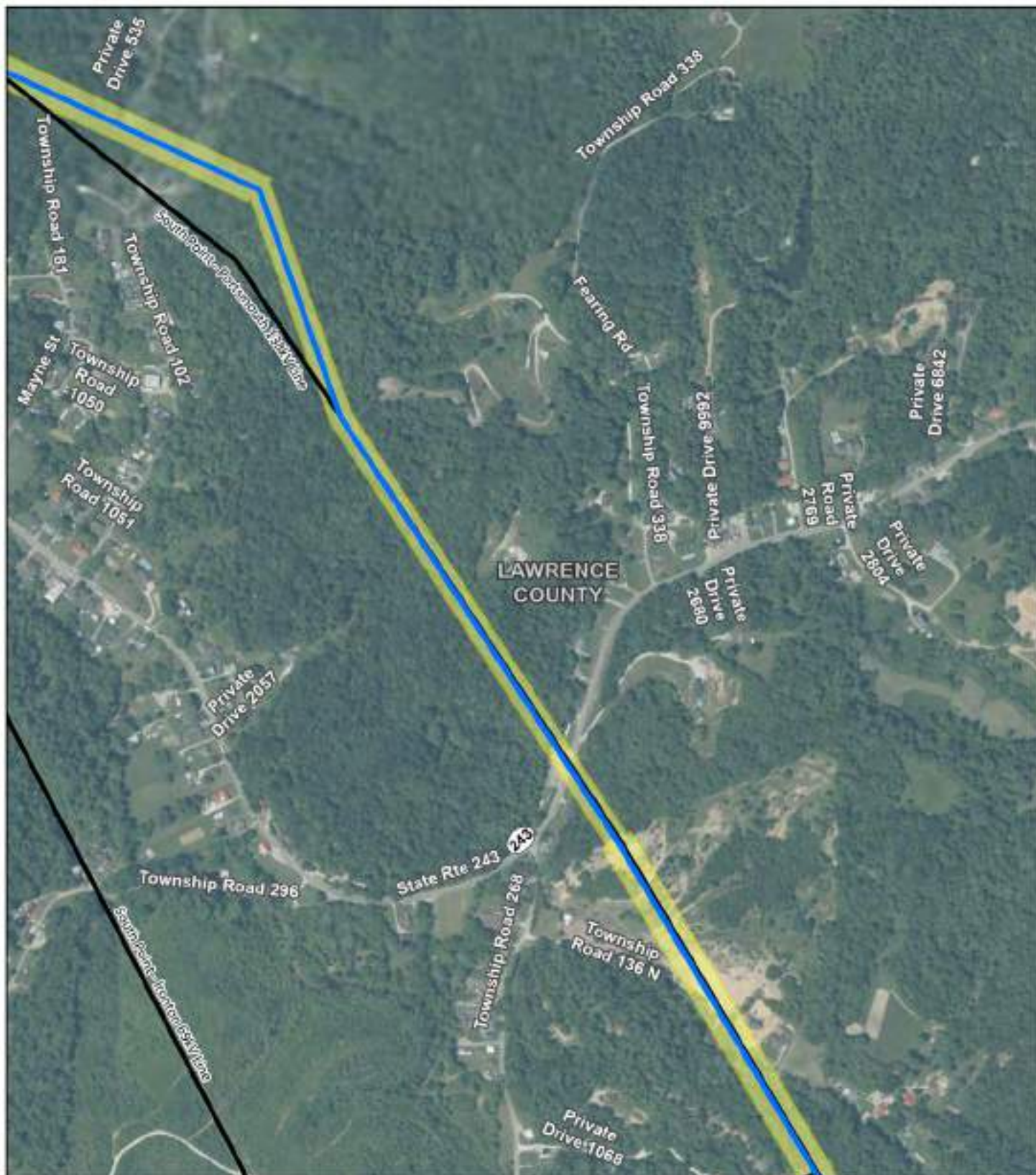


**FIGURE 3F
AERIAL MAP**



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⛔ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

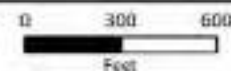
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet

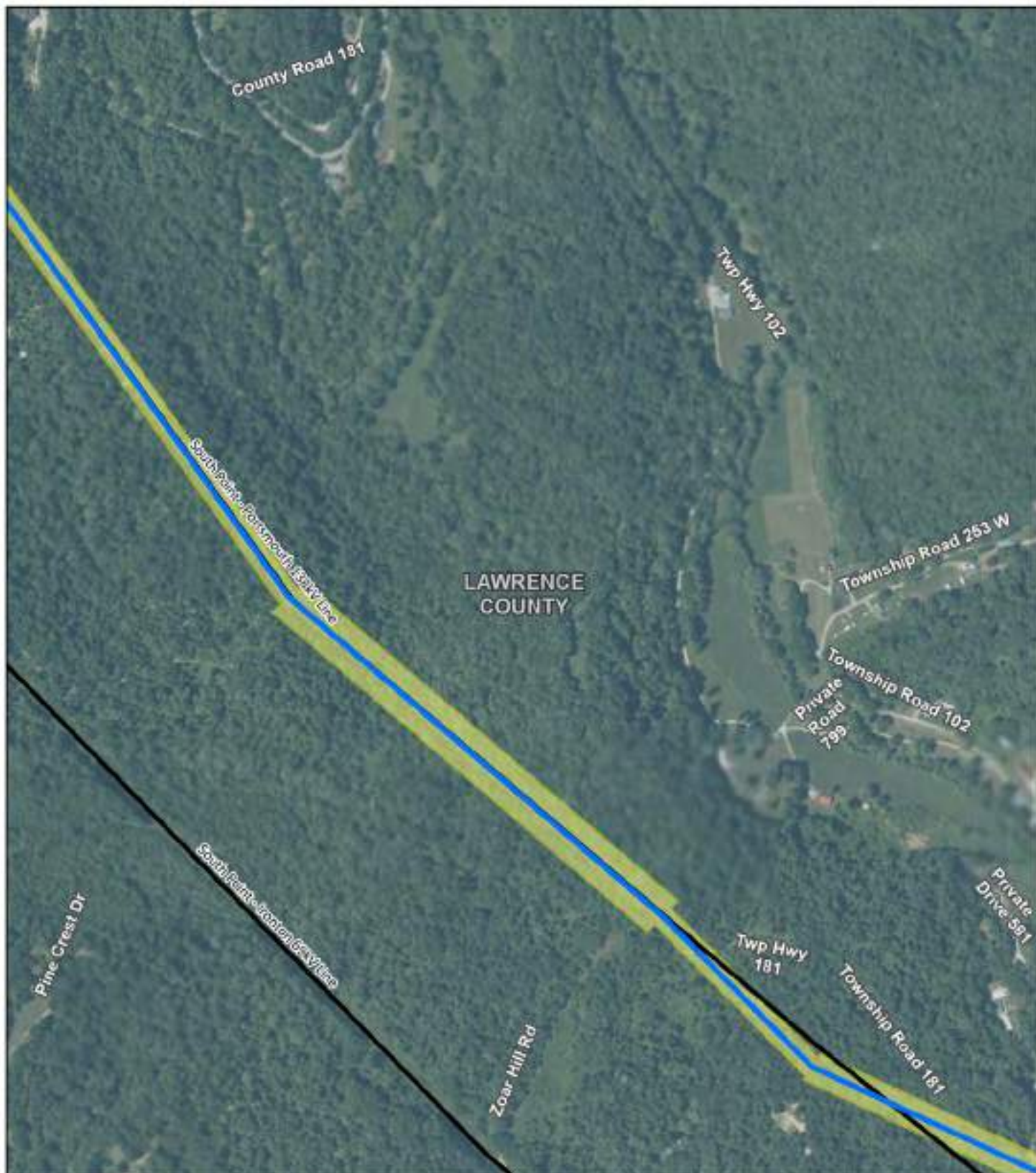


**FIGURE 3G
AERIAL MAP**



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



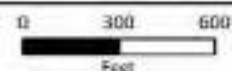
September 24, 2024

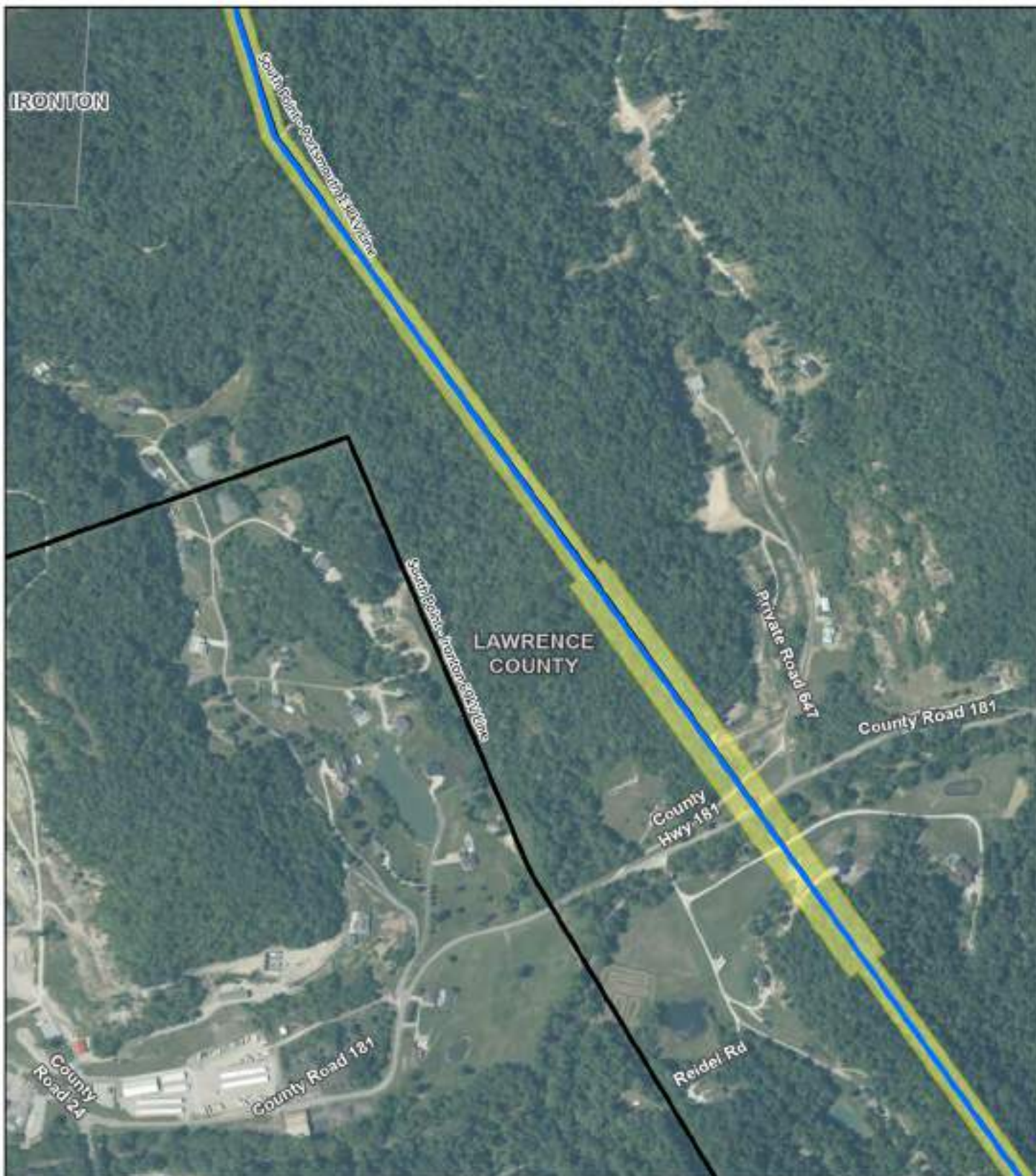


FIGURE 3H AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⛔ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



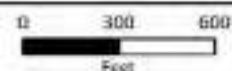
September 24, 2024



**FIGURE 3I
AERIAL MAP**



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⛔ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

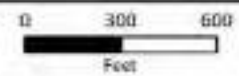
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet

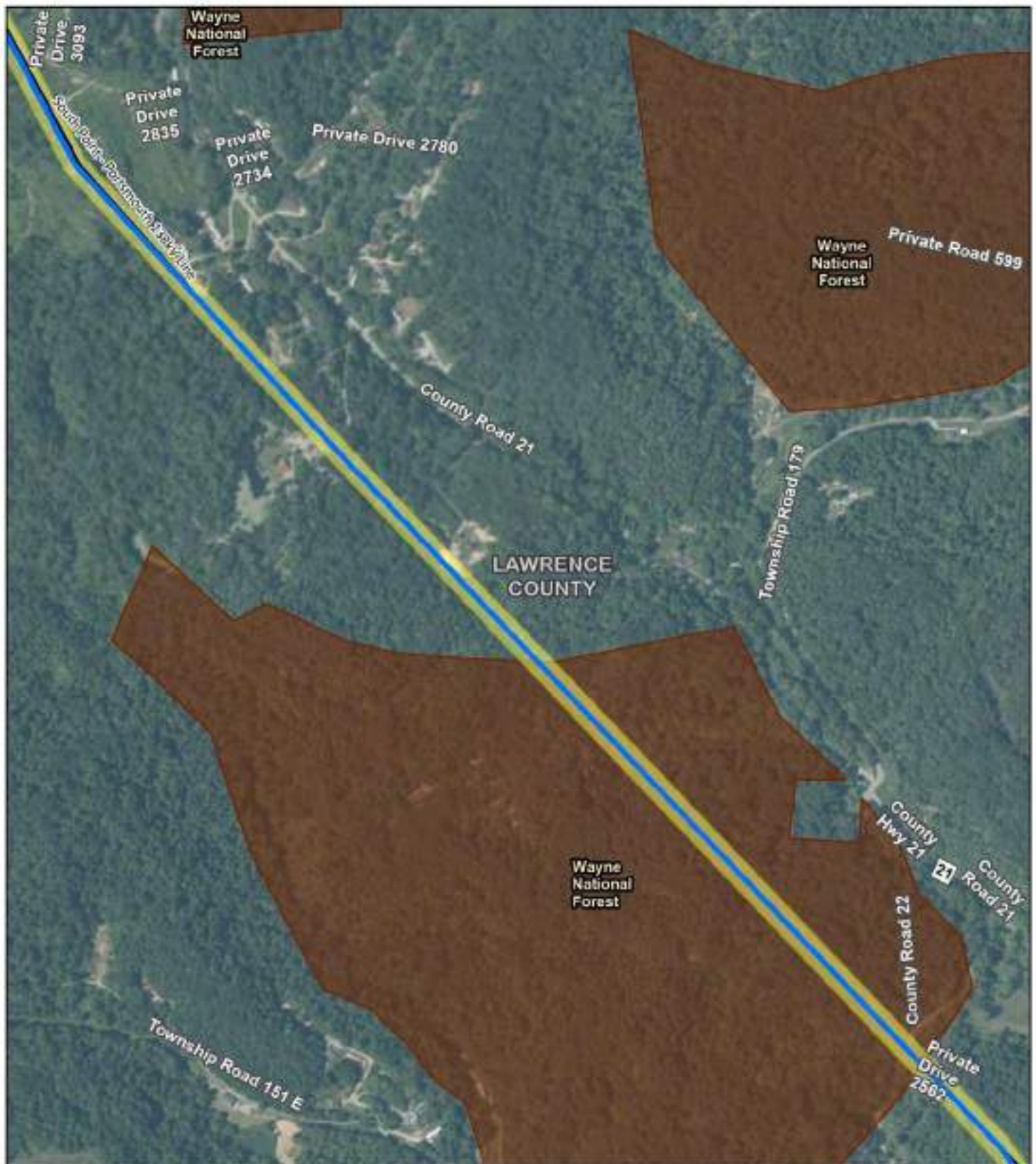


**FIGURE 3L
AERIAL MAP**



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



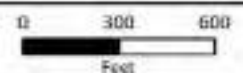
September 24, 2024

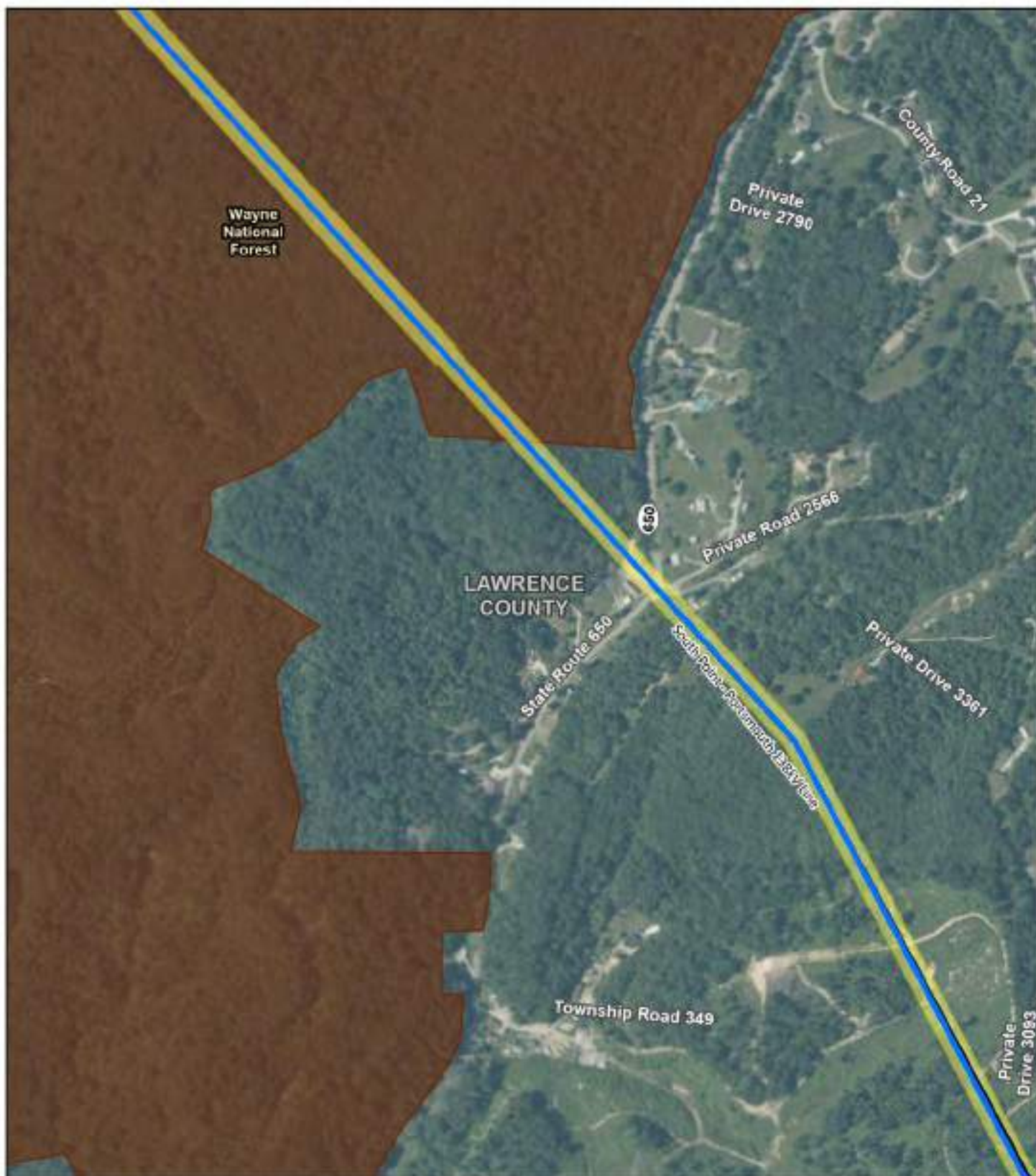


FIGURE 3M AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⛔ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

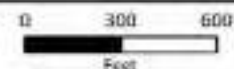
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet

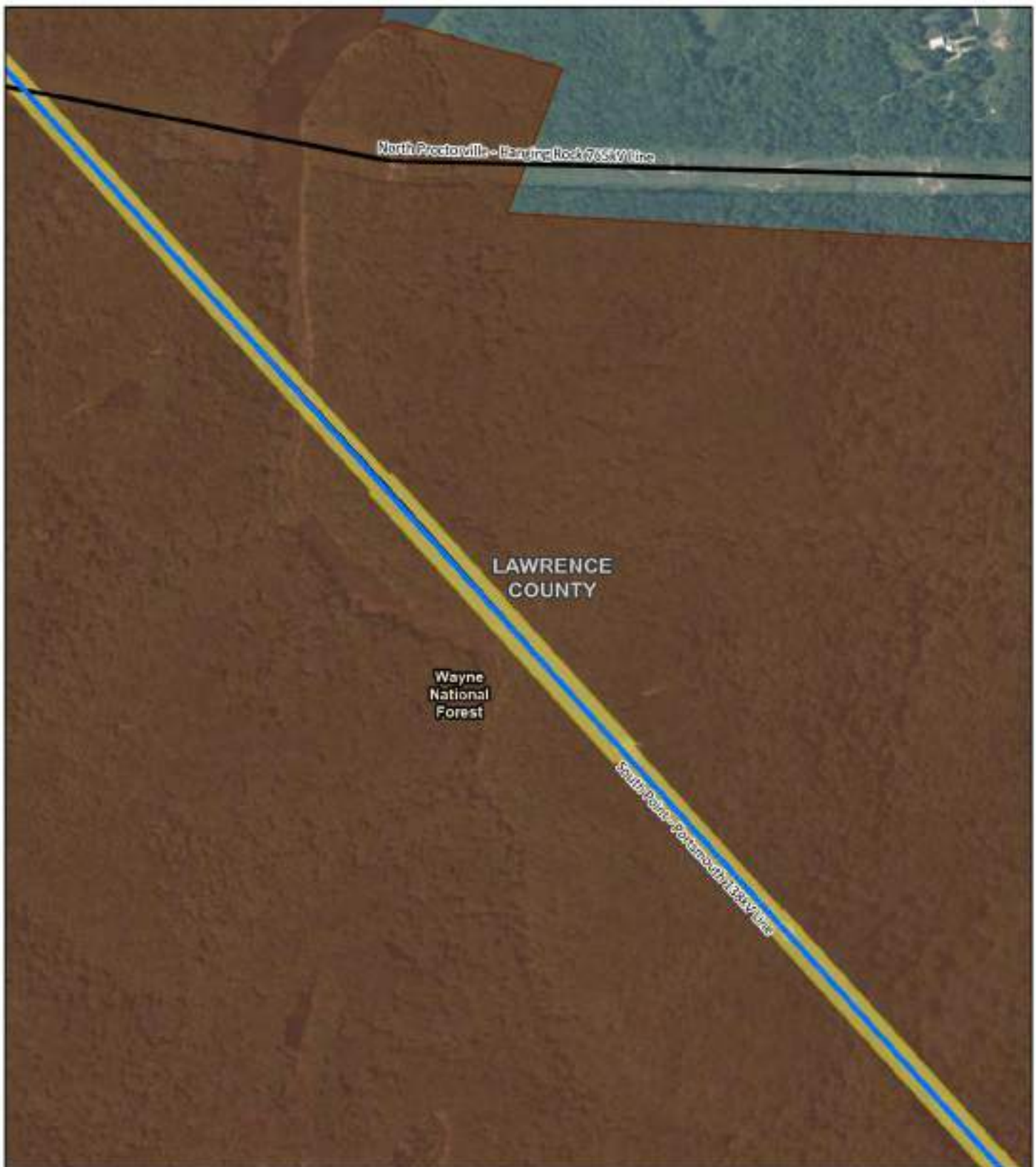


FIGURE 3N AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⛱ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

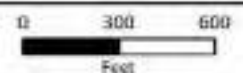
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet

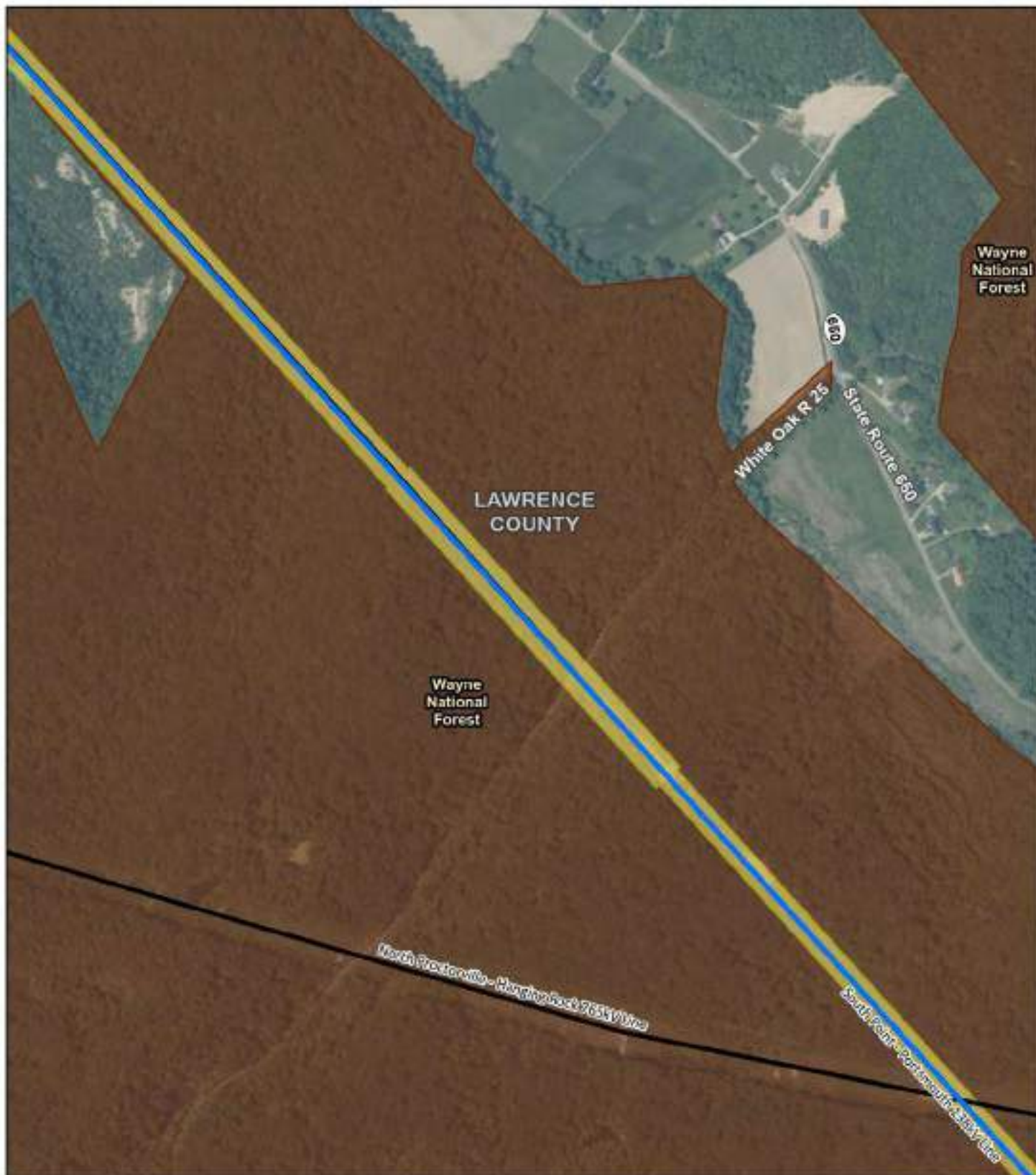


**FIGURE 30
AERIAL MAP**



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⛔ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

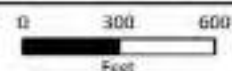
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



FIGURE 3P AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⚰ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet

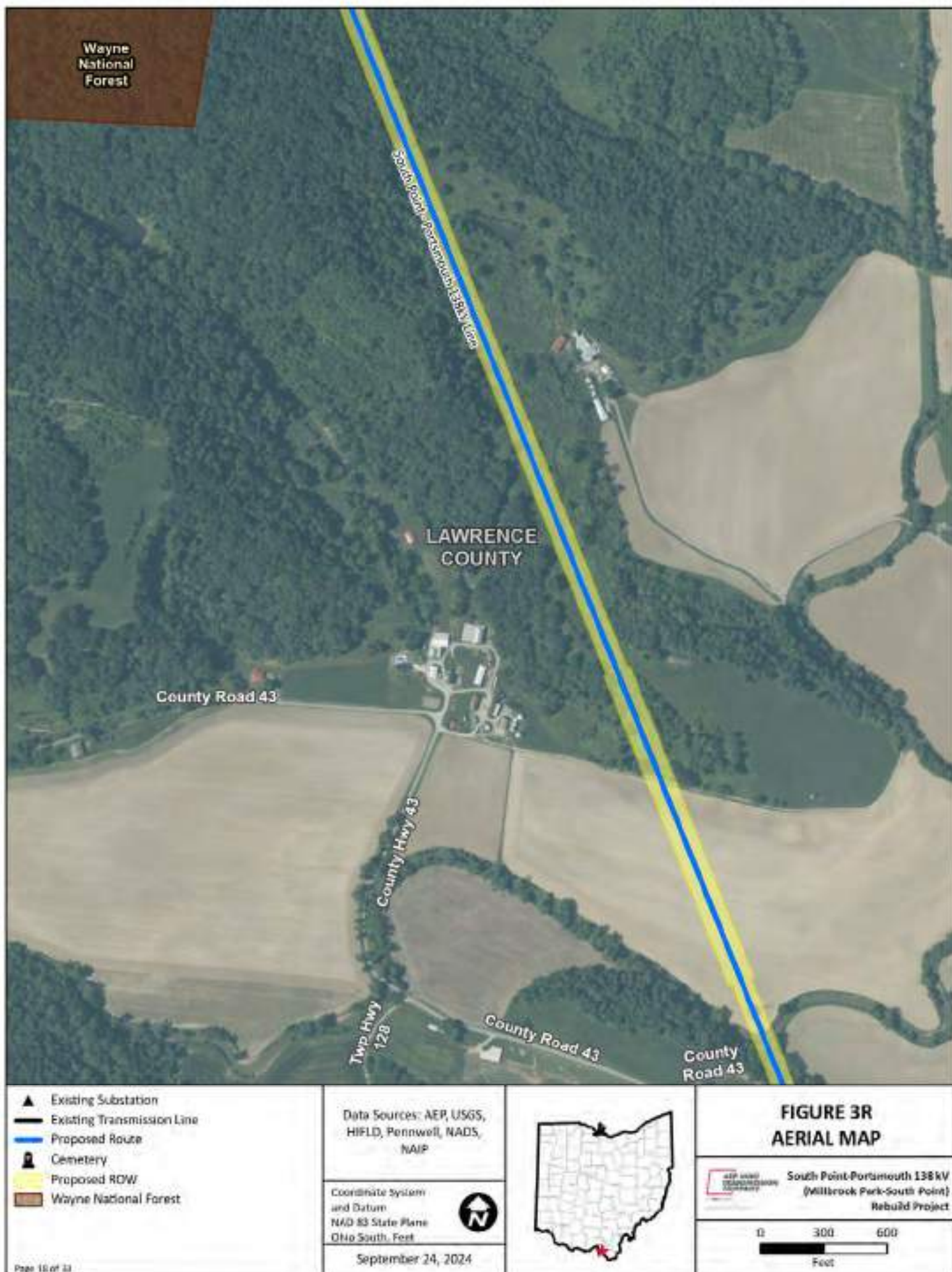


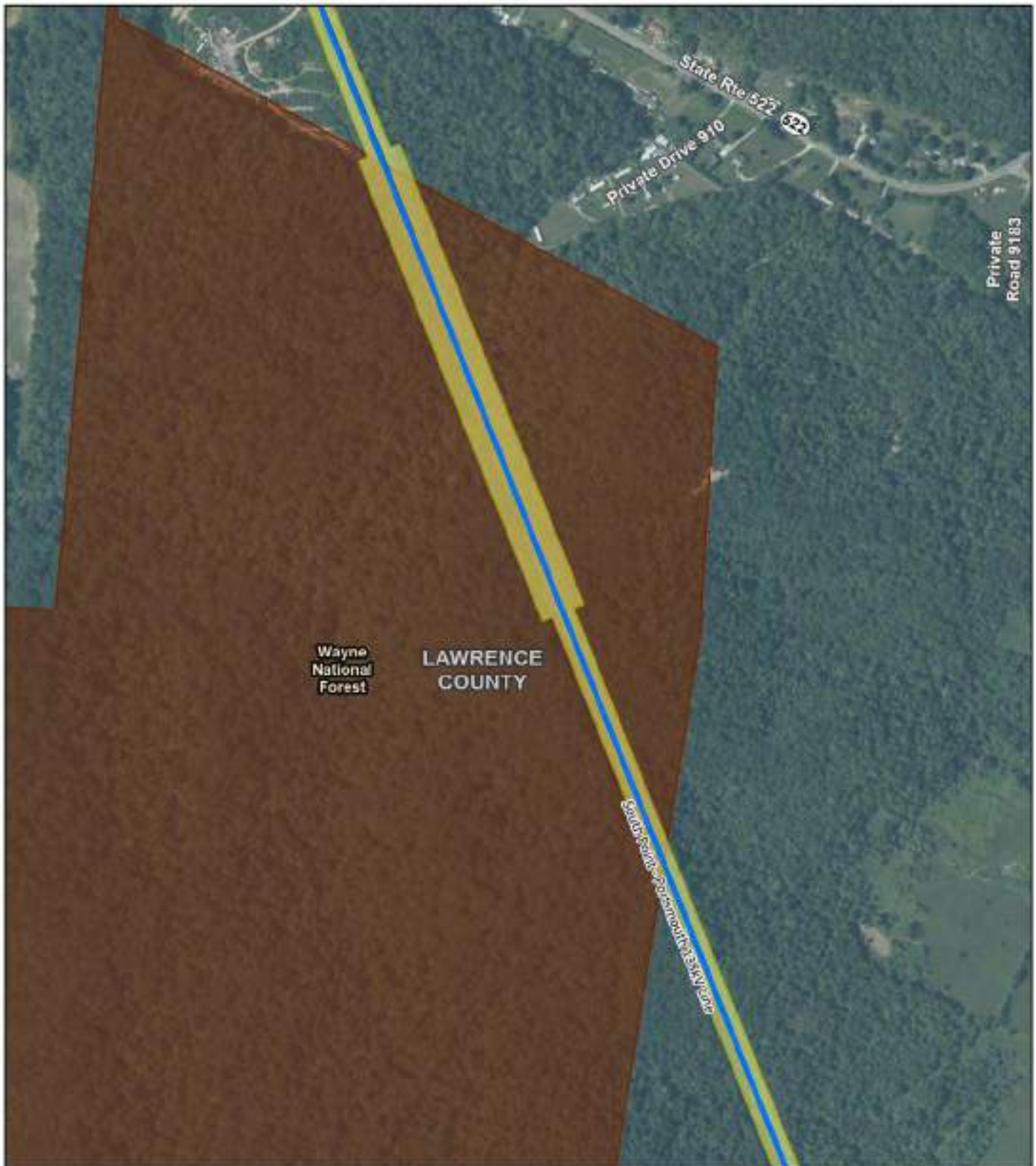
**FIGURE 3Q
AERIAL MAP**



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project

0 300 600
Feet





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⚰ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

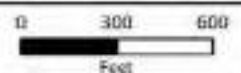
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



FIGURE 3S AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⛔ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



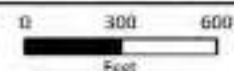
September 24, 2024



FIGURE 3T AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⛔ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



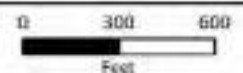
September 24, 2024



FIGURE 3U AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⛔ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



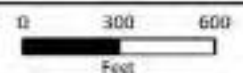
September 24, 2024

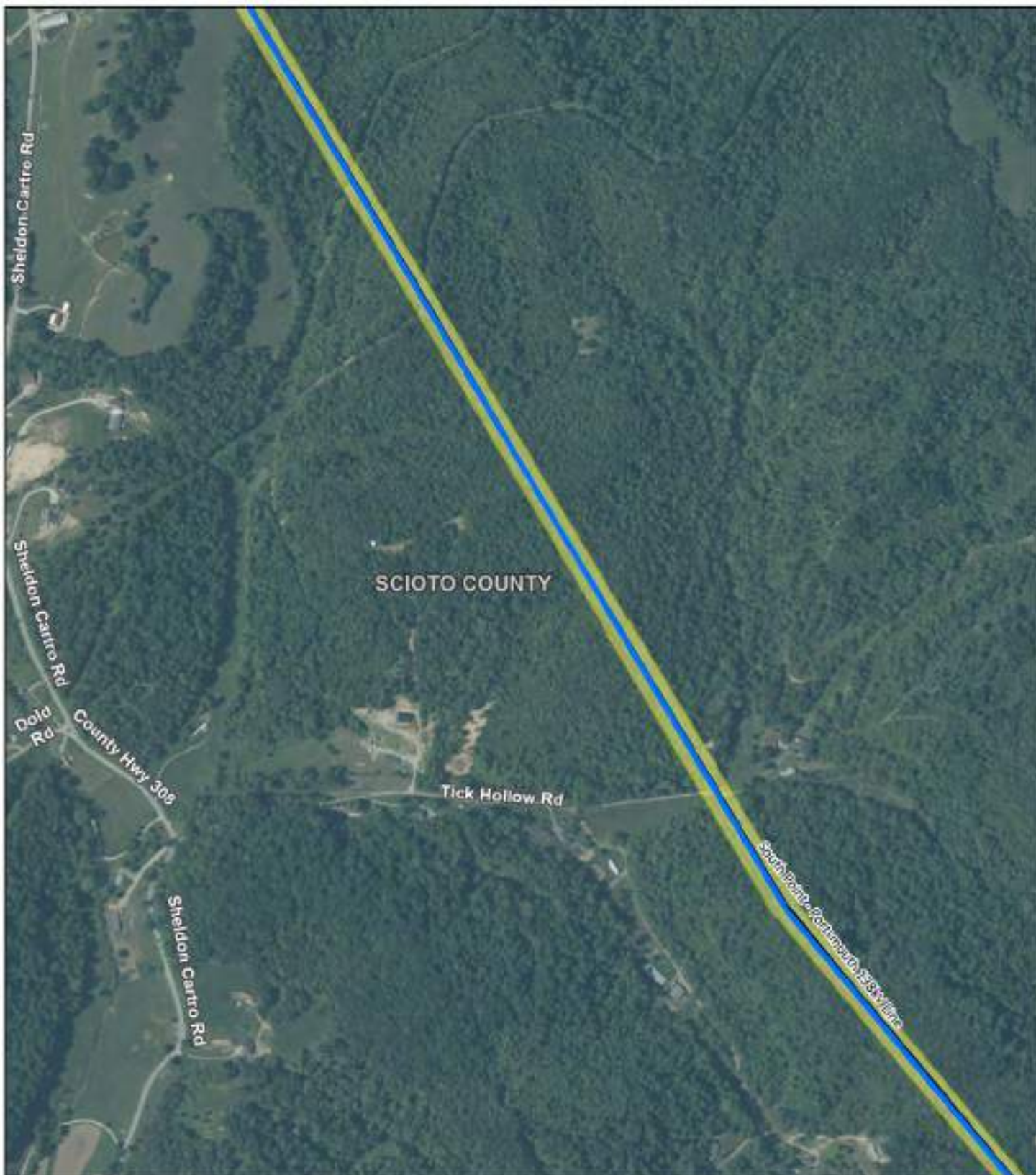








FIGURE 3V AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





-  Existing Substation
-  Existing Transmission Line
-  Proposed Route
-  Cemetery
-  Proposed ROW
-  Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



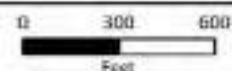
September 24, 2024

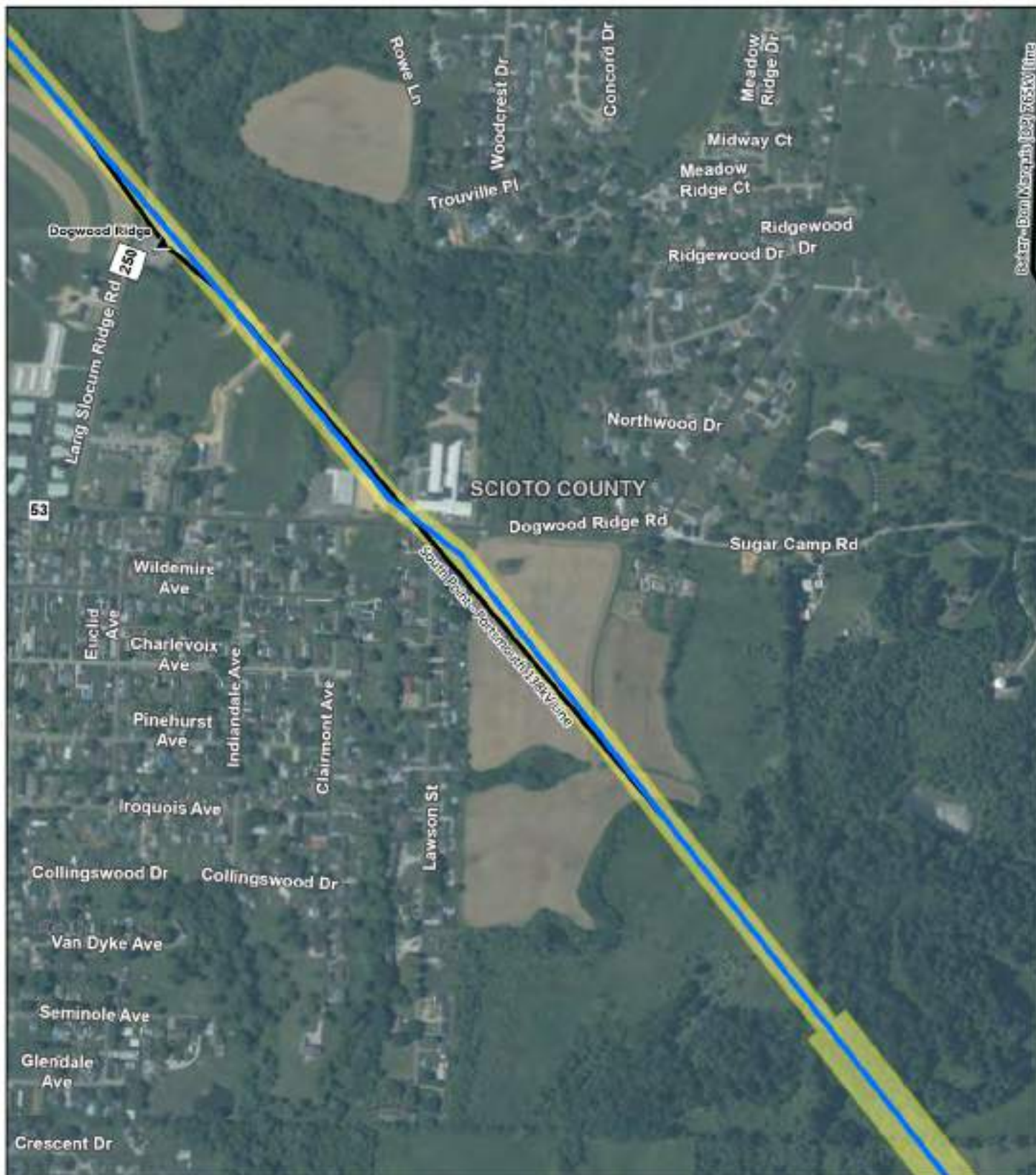


FIGURE 3W AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





Carter-Dani Morgan 10/27/2023

- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



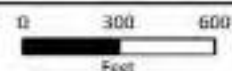
September 24, 2024

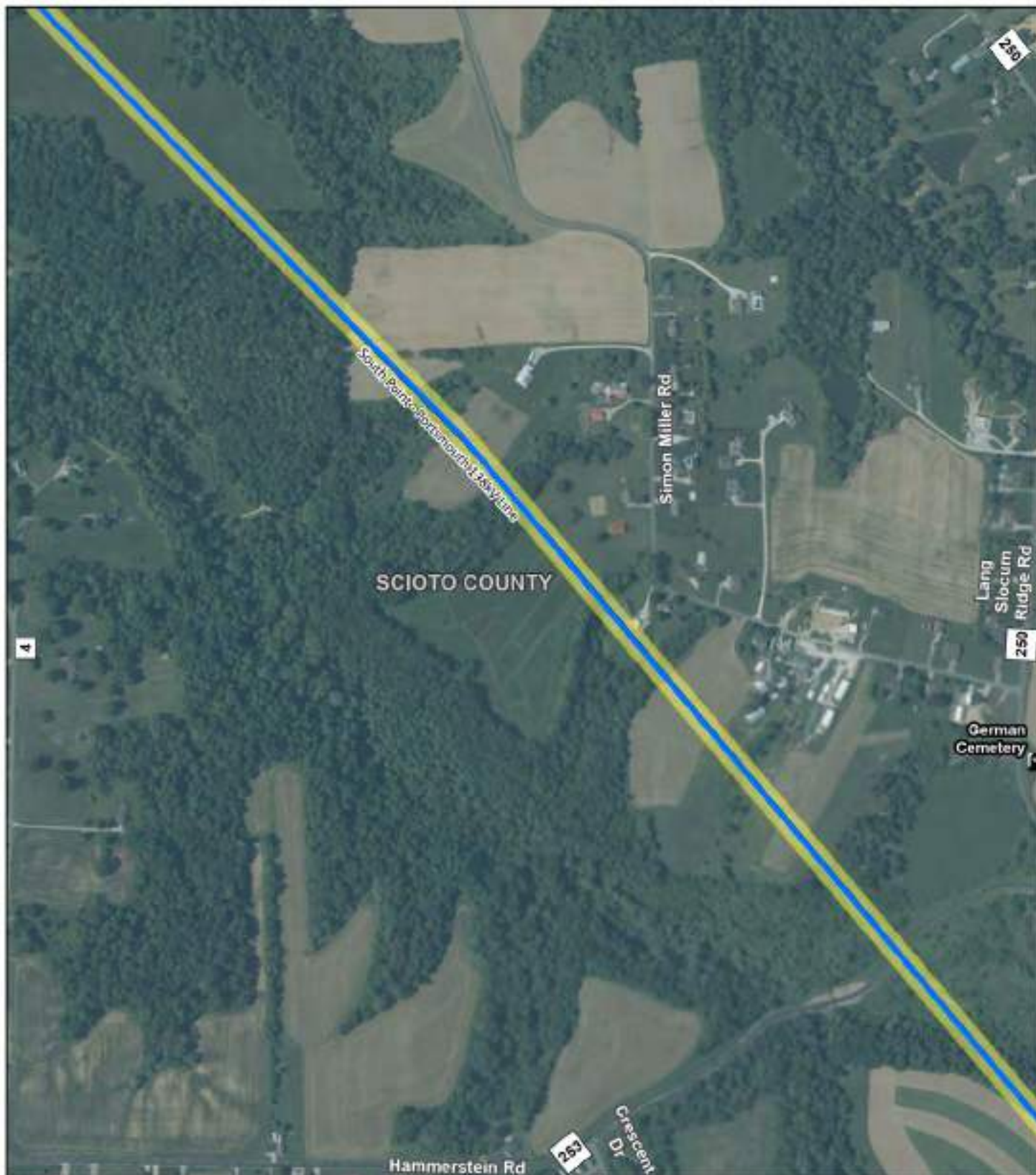


FIGURE 3Z AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet

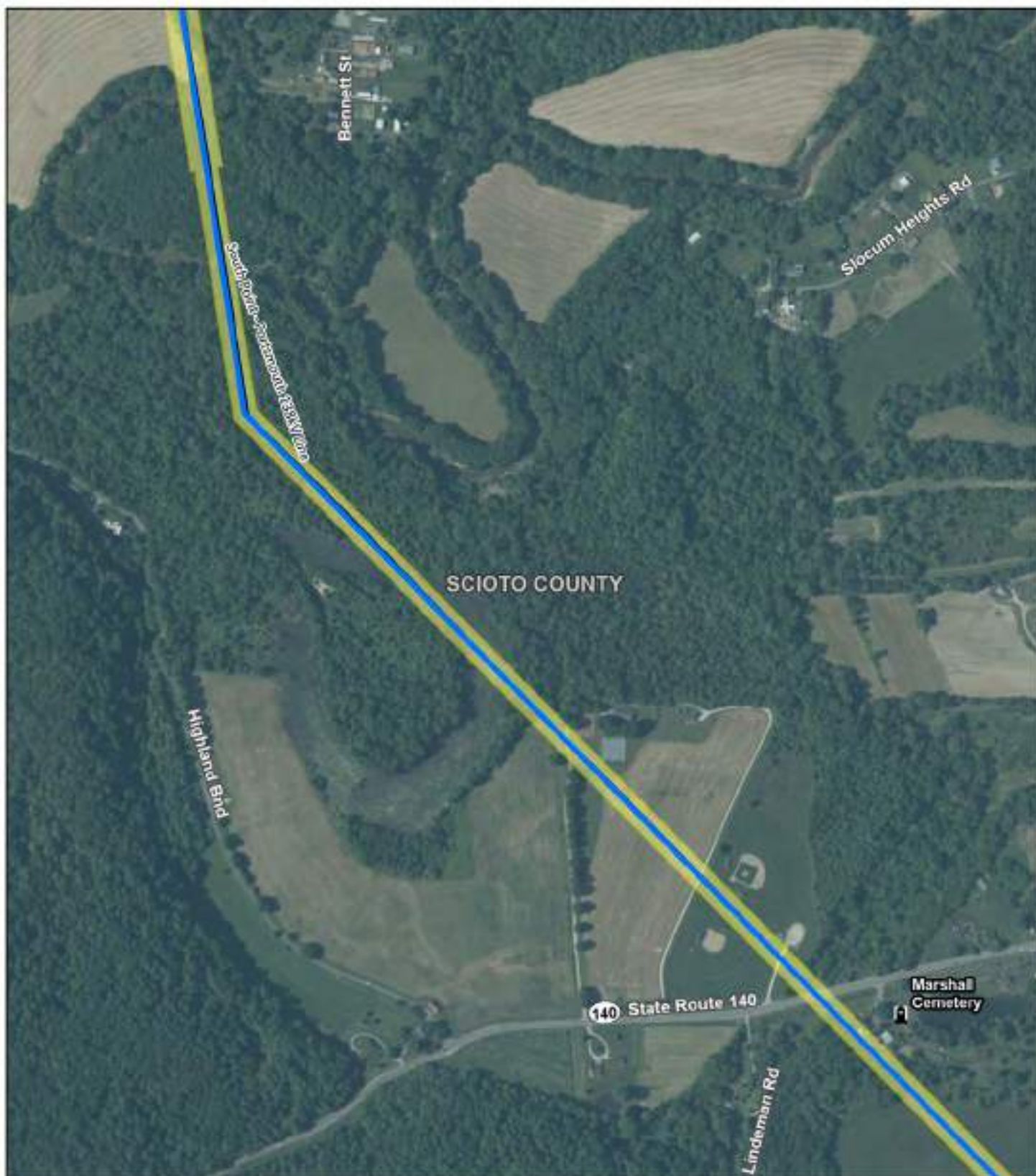


FIGURE 3AA AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project

0 300 600
Feet



- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⛔ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

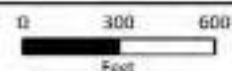
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



FIGURE 3BB AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⚰ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

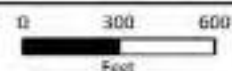
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



FIGURE 3CC AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⛔ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



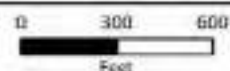
September 24, 2024

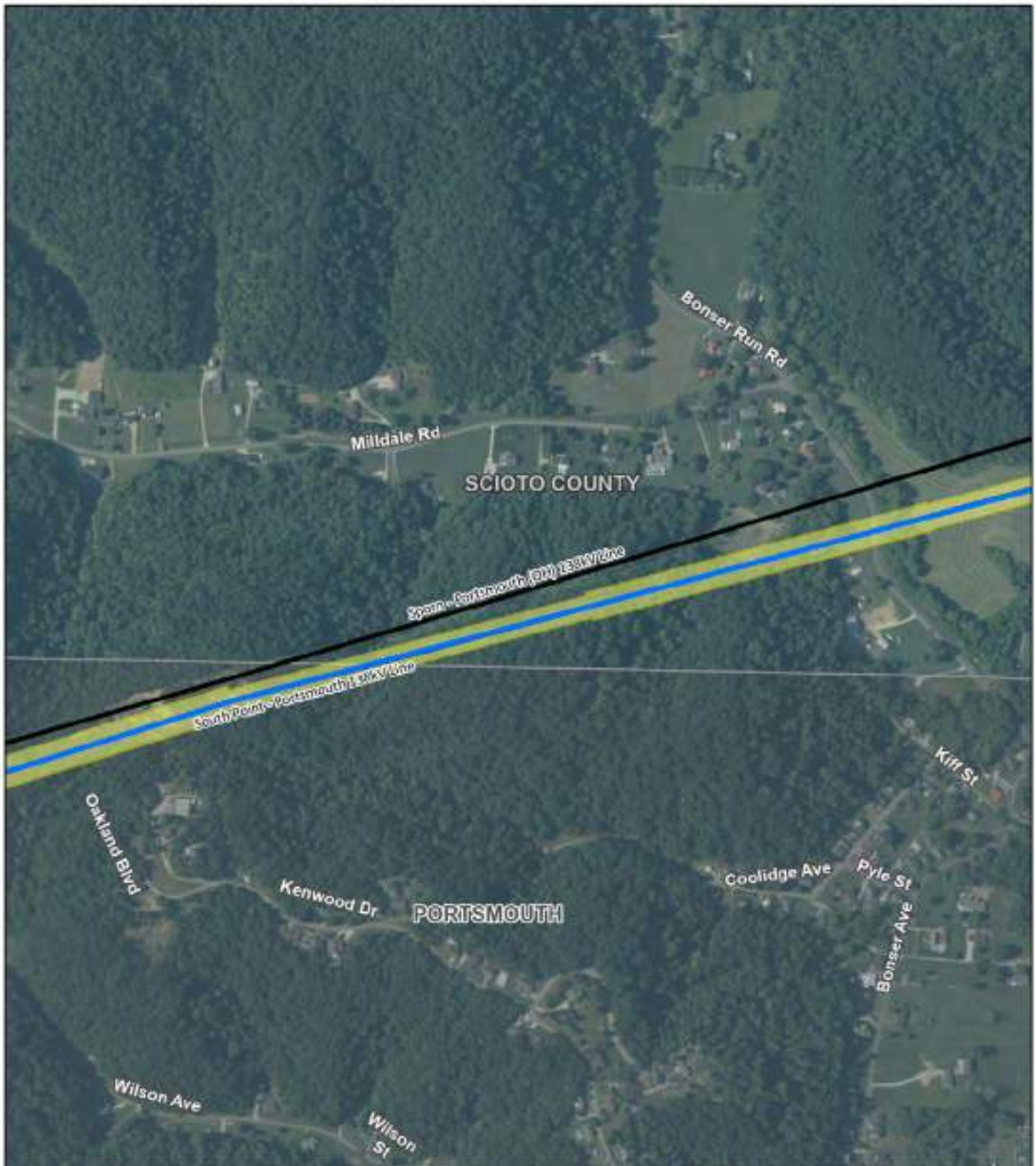


FIGURE 3DD AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⚰ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



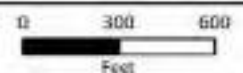
September 24, 2024

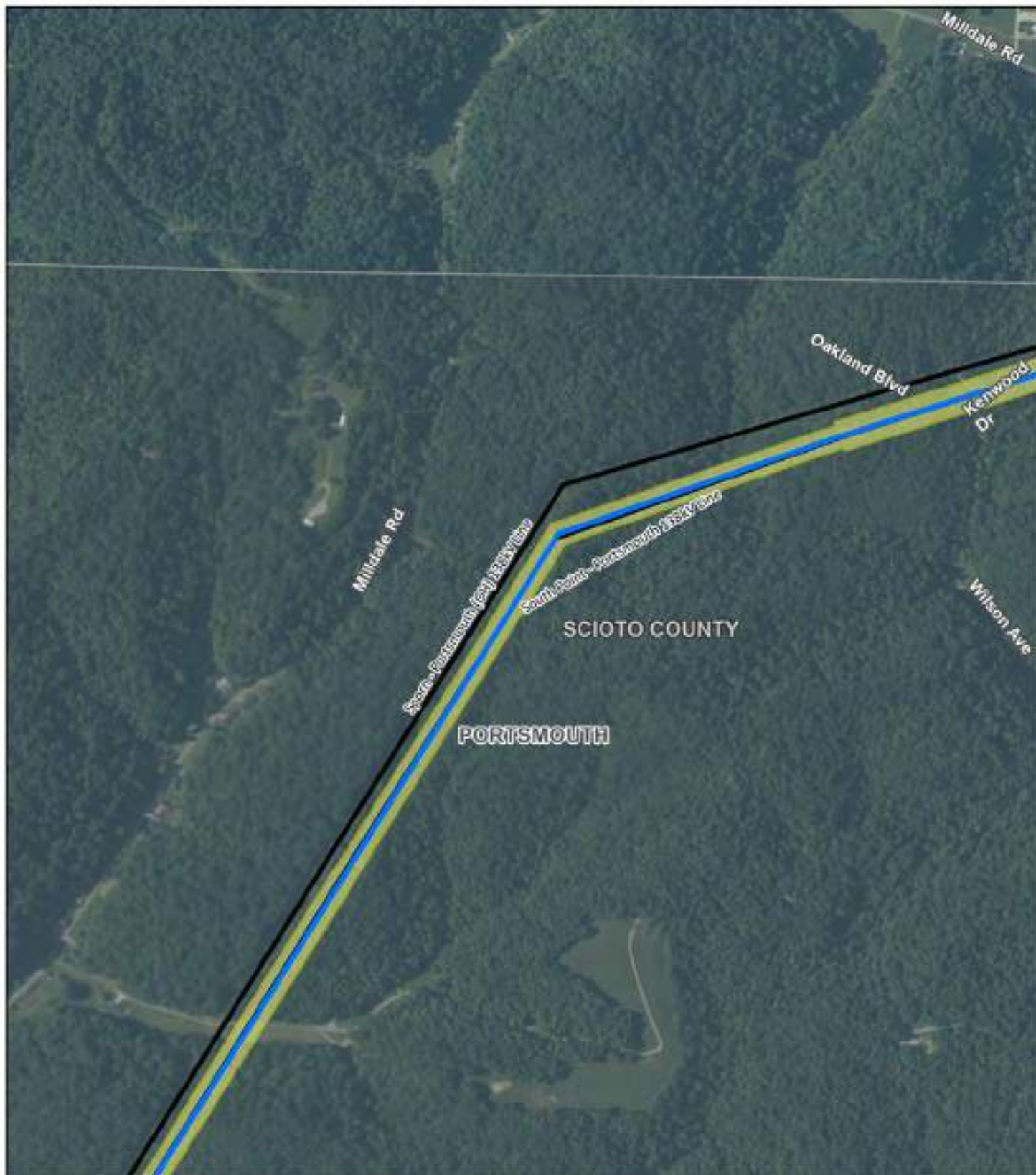


FIGURE 3EE AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⚰ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

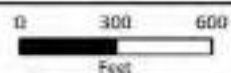
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet

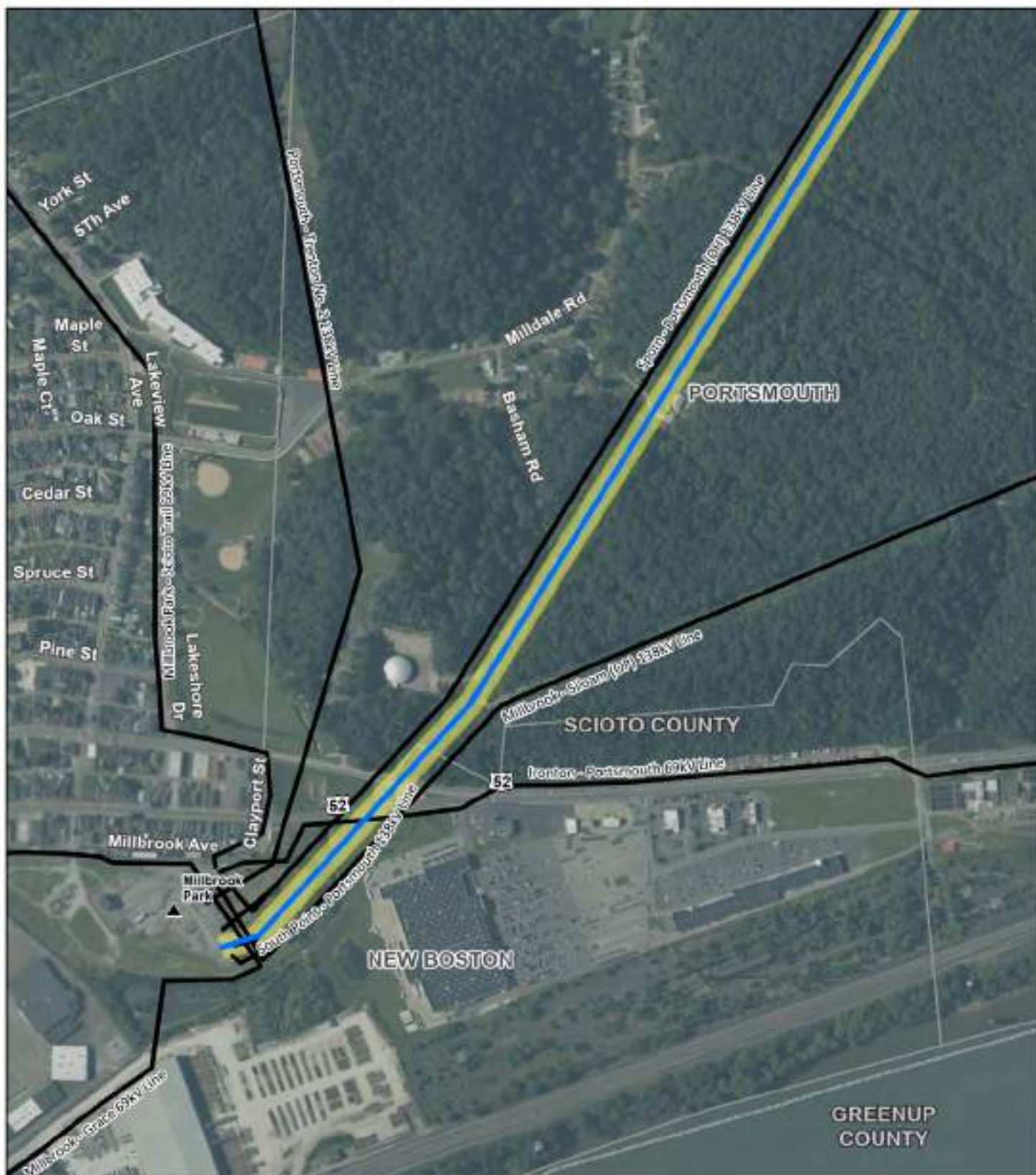


FIGURE 3FF AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Proposed Route
- ⚰ Cemetery
- Proposed ROW
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

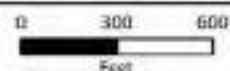
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet

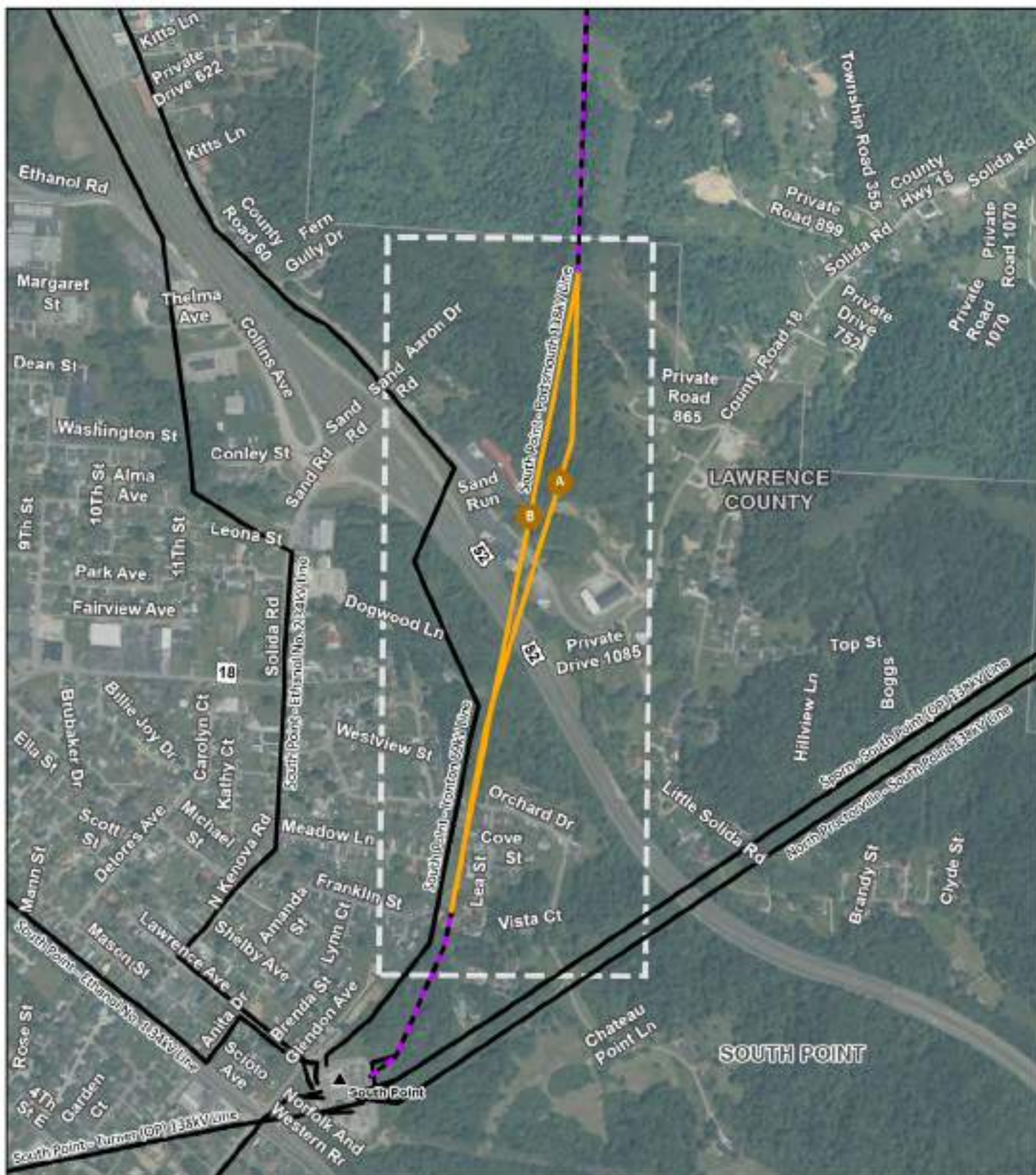


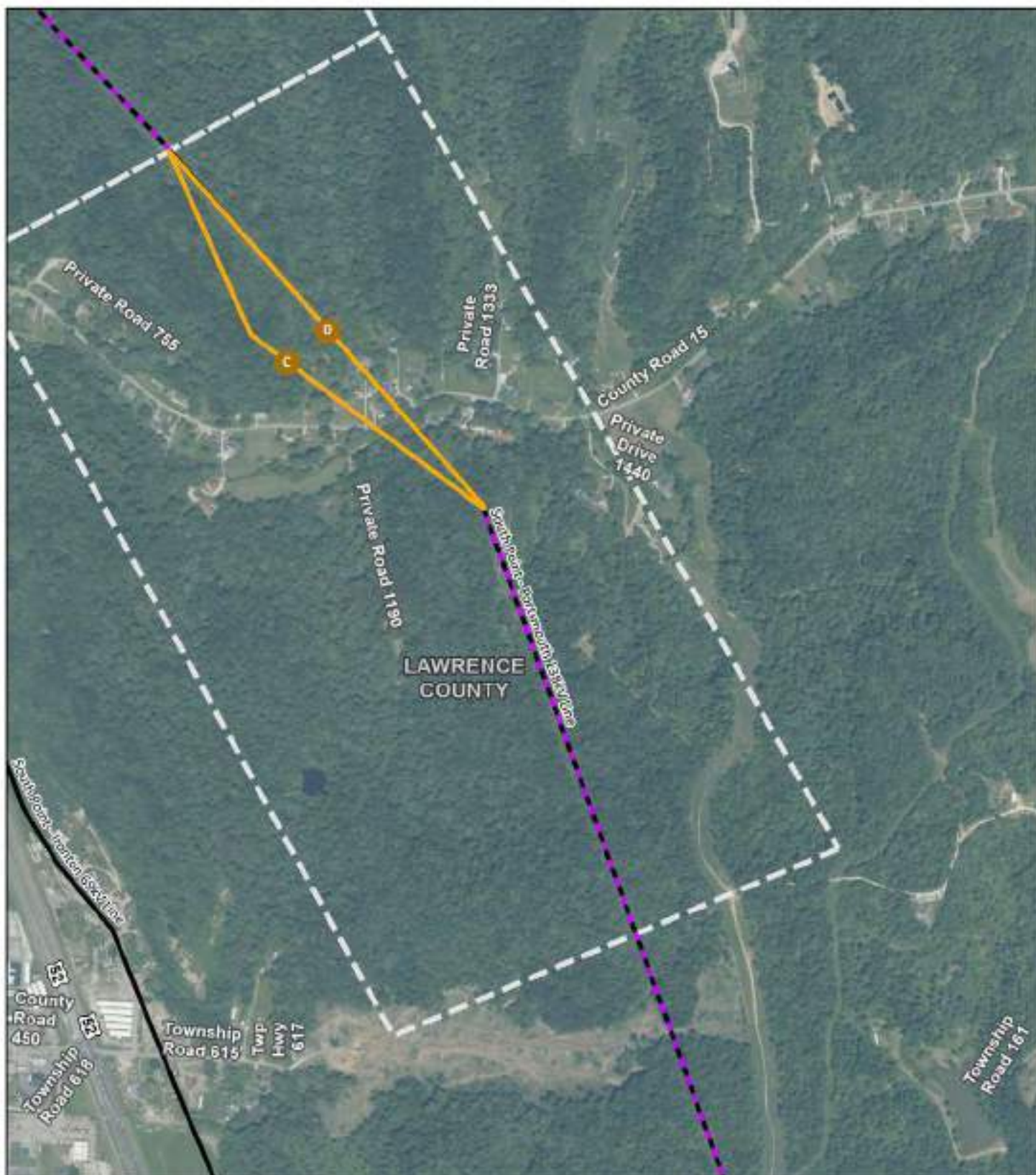
FIGURE 3GG AERIAL MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project







- ▲ Existing Substation
- Existing Transmission Line
- Alternative Route
- - - Rebuild on Centerline
- Focus Area
- ⛔ Cemetery
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

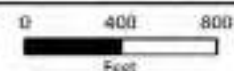
Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet

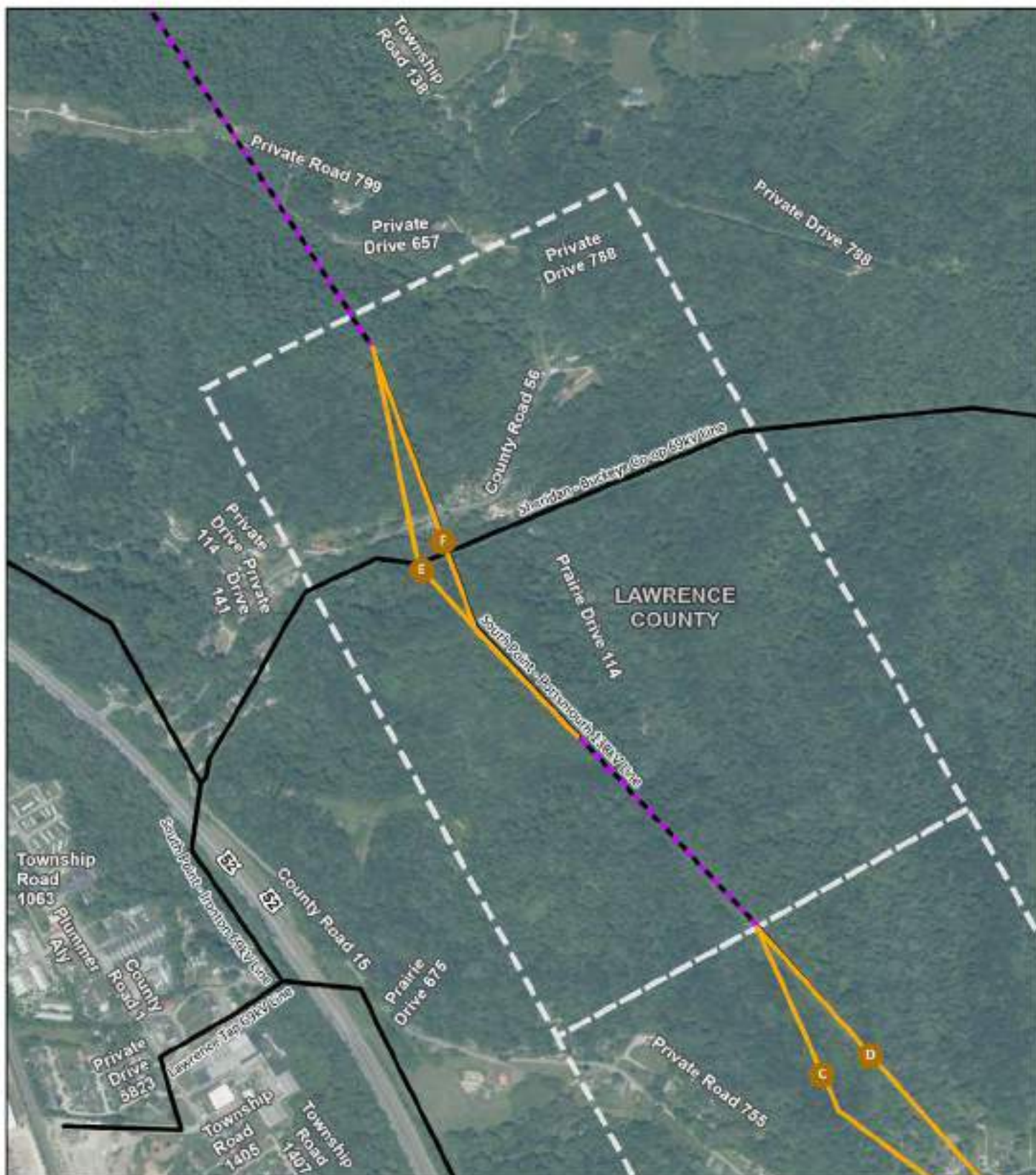


FIGURE 4B ALTERNATIVE ROUTES MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project





- ▲ Existing Substation
- Existing Transmission Line
- Alternative Route
- - - Rebuild on Centerline
- Focus Area
- ✕ Cemetery
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



September 24, 2024

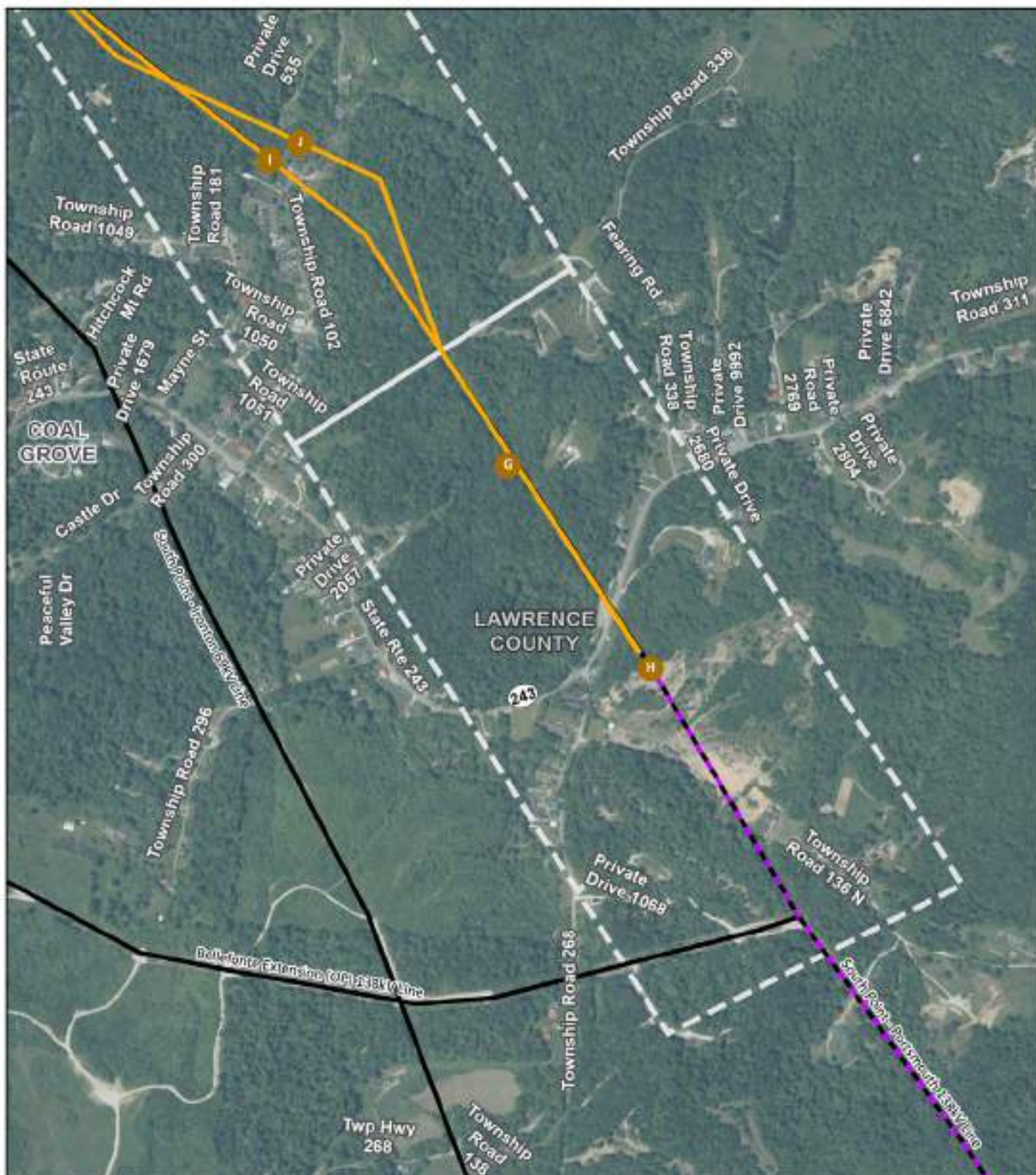


FIGURE 4C ALTERNATIVE ROUTES MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project

0 400 800
Feet



**FIGURE 4D
ALTERNATIVE ROUTES MAP**

South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project

0 400 800
Feet

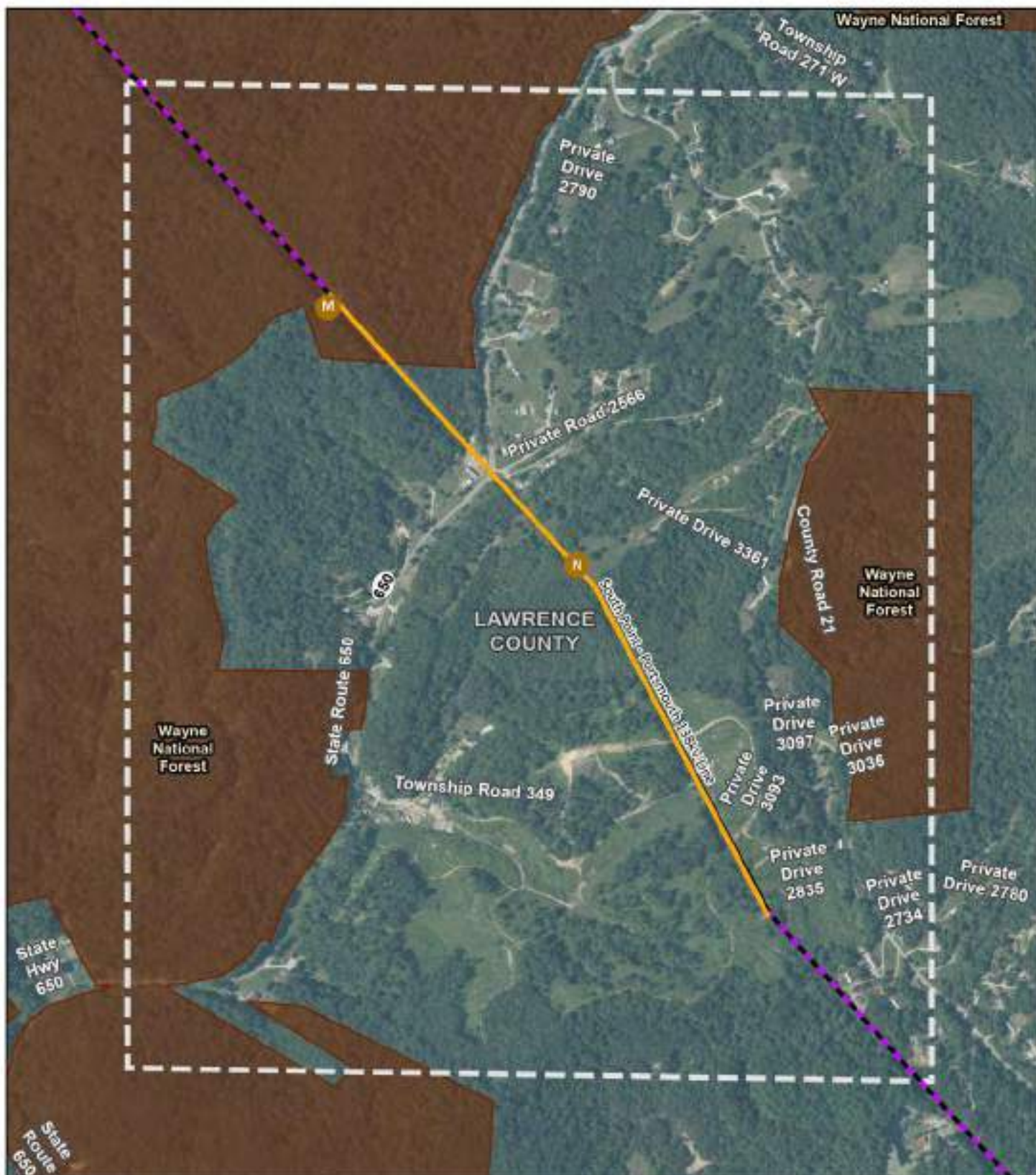
- ▲ Existing Substation
- Existing Transmission Line
- Alternative Route
- - - Rebuild on Centerline
- Focus Area
- ⛔ Cemetery
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



September 24, 2024



- ▲ Existing Substation
- Existing Transmission Line
- Alternative Route
- - - Rebuild on Centerline
- Focus Area
- ⚰ Cemetery
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



FIGURE 4G ALTERNATIVE ROUTES MAP



South Point-Portsmouth 138 kV
(Millbrook Park-South Point)
Rebuild Project

0 400 800
Feet



Center - Don Marquis (303) 555-1111

- ▲ Existing Substation
- Existing Transmission Line
- Alternative Route
- Rebuild on Centerline
- Focus Area
- Cemetery
- Wayne National Forest

Data Sources: AEP, USGS,
HIFLD, Pennwell, NADS,
NAIP

Coordinate System
and Datum
NAD 83 State Plane
Ohio South, Feet



September 24, 2024



FIGURE 4H ALTERNATIVE ROUTES MAP



South Point-Portsmouth 138kV
(Millbrook Park-South Point)
Rebuild Project

0 400 800
Feet

**LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 KV (MILLBROOK PARK-
SOUTH POINT) REBUILD PROJECT**

Appendix B PJM Submittal and Long-Term Forecast Report



AEP Transmission Zone M-3 Process Millbrook Park-South Point Rebuild

Need Number: AEP-2019-OH025

Process Stage: Solutions Meeting 05/22/2020

Previously Presented: Needs Meeting 05/20/2019

Supplemental Project Driver: Equipment/Material/Performance/Risk

Specific Assumptions Reference: AEP Guidelines for Transmission Owner Identified Needs (AEP Assumptions Slide 8), Presentation on pre-1930s lines

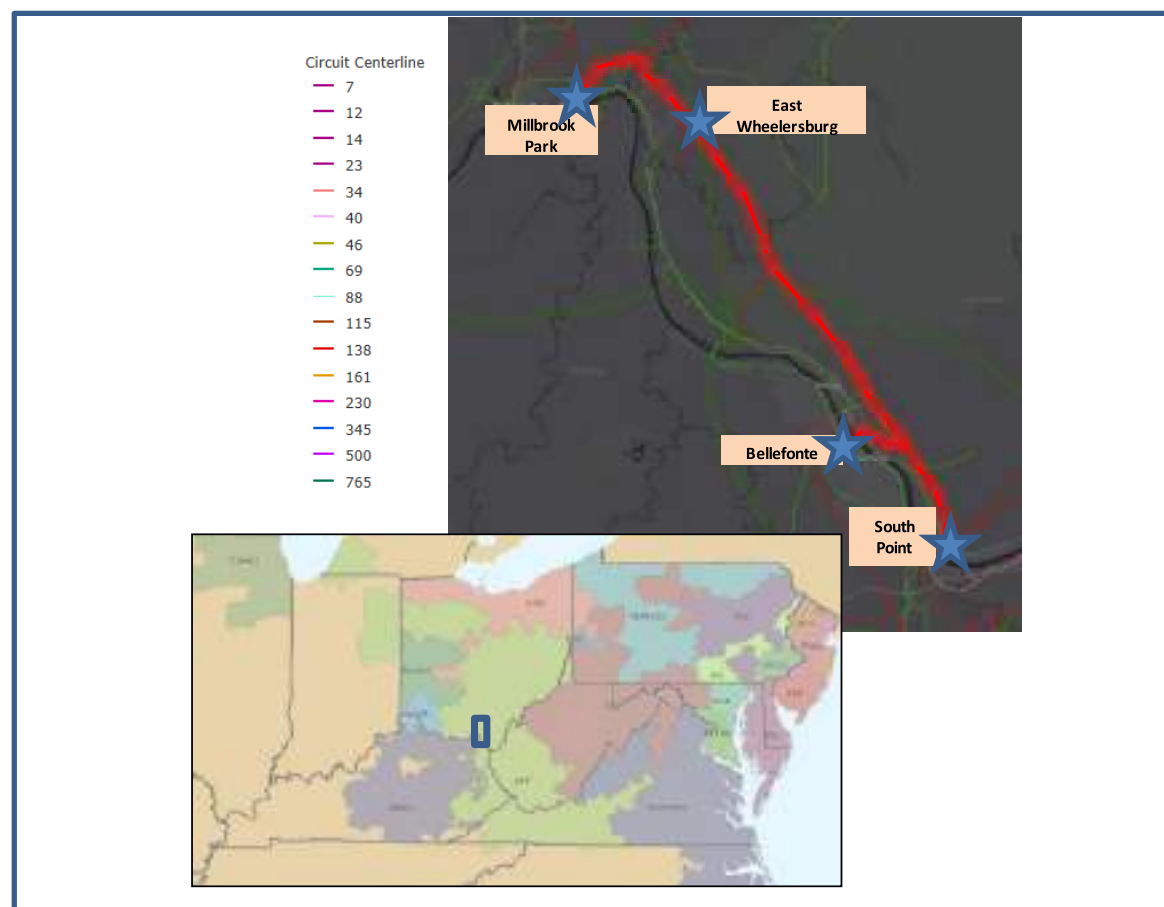
Problem Statement:

- The South Point – Portsmouth 138 kV double circuit is 34.7 miles and the Bellefonte 138 kV Extension is 4 miles in length.
- The conductor is primarily 397.5 ACSR (167 MVA).
- The South Point-Portsmouth line was originally constructed in 1929, with the majority of the structures and conductor being original.
- There are 45 open conditions on the line, including conductor issues, burnt/broken insulators, and loose/broken conductor hardware.
- Insulators of this vintage have shown heightened failure rates.

In general, several issues impact 1920 lattice tower lines:

- The steel conductor attachment plates have significant wear resulting in a loss of 50% of its strength.
- The cross arm hanger tension members are single mode of failure elements that are deteriorated and undersized due to the original design criteria.
- Lattice towers of this vintage do not meet current design requirements for wind and ice loading.
- Foundations are undersized for modern wind loading.
- Towers are beginning to show corrosion.

Model: N/A





AEP Transmission Zone M-3 Process Millbrook Park-South Point Rebuild

Need Number: AEP-2019-OH025

Process Stage: Solutions Meeting 05/22/2020

Proposed Solution:

Rebuild the 35-miles of the South Point- Portsmouth double circuit 138 kV line between Millbrook Park – South Point; with 795 ACSR (257MVA) or equivalent conductor. **Estimated Cost: \$128.0M**

Rebuild the 3.8-miles of the Bellefonte Extension Line from the South Point – Portsmouth line to Bellefonte; with 795 ACSR (257MVA) or equivalent conductor. **Estimated Cost: \$20.1M**

Remote end work at South Point station. **Estimated Cost: \$0.6M**

Total Estimated Transmission Cost: \$148.7M

Alternatives Considered:

Rebuild the Millbrook Park – South Point 138 kV corridor as single circuit by retiring the existing Millbrook Park – South Point 138 kV circuit and rebuilding the Millbrook Park – Bellefonte – North Proctorville 138 kV circuits.

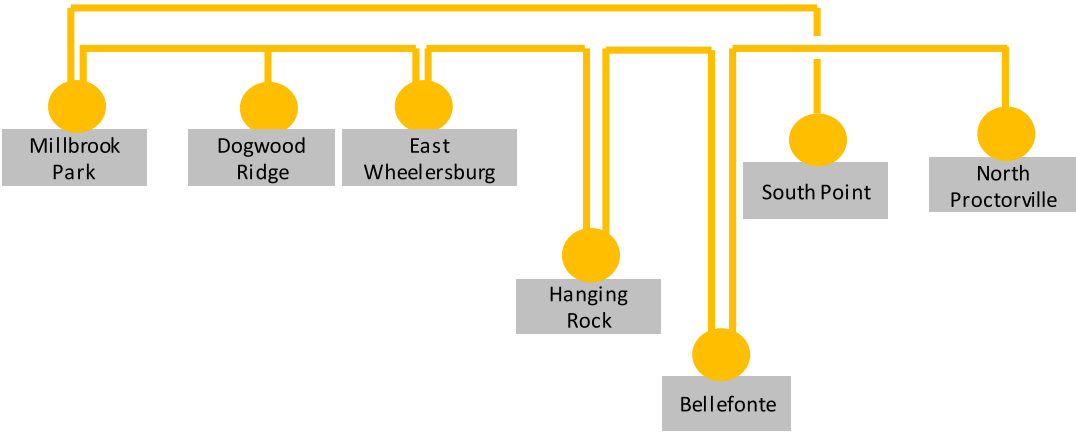
The area that the line traverses consistently receives a significant amount of large load inquiries due to its proximity to the Ohio River and railways. Reducing the corridor to a single circuit would greatly diminish the ability to support new load in the area due to the existing connections to the area’s 69 kV system. Flexibility in how to address the area’s existing 69 kV system in the future would also be greatly limited.

Estimated Alternative Transmission Cost: \$138.7M

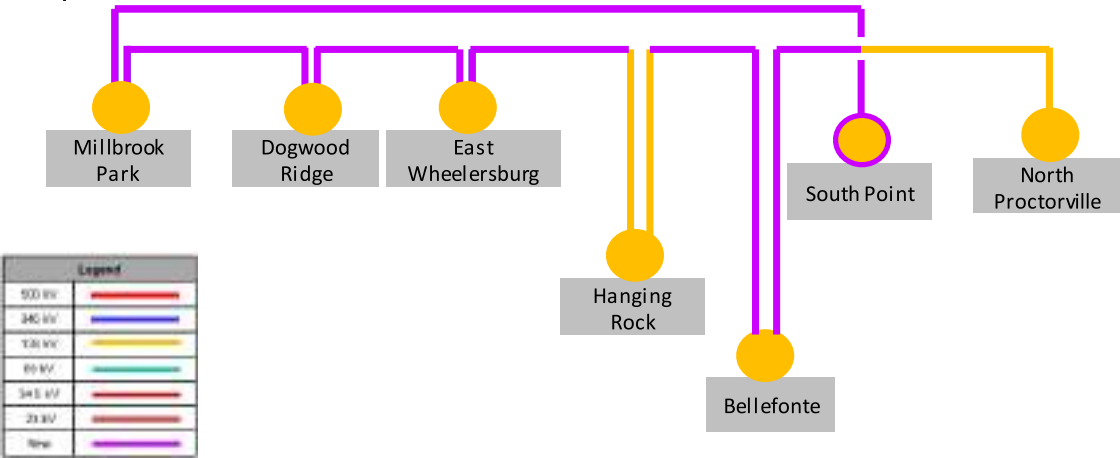
Projected In-Service: 12/15/2025

Project Status: Scoping

Existing:



Proposed:



7.	CAPITAL INVESTMENT:	\$25M
8.	PLANNED SUBSTATION:	N/A
9.	SUPPORTING STRUCTURES:	Steel
10.	PARTICIPATION WITH OTHER UTILITIES	N/A
11.	PURPOSE OF THE PLANNED TRANSMISSION LINE	Rebuild of existing 138 kV line
12.	CONSEQUENCES OF LINE CONSTRUCTION DEFERMENT OR TERMINATION	Increased risk of equipment failure.
13.	MISCELLANEOUS:	
1.	LINE NAME AND NUMBER:	Millbrook Park - South Point / Millbrook Park - E. Wheelersburg - Bellefonte - N. Proctorville - S. Point (s2272) TP2019104
2.	POINTS OF ORIGIN AND TERMINATION	Millbrook Park, South Point INTERMEDIATE STATION - Dogwood Ridge, East Wheelersburg, Hanging Rock, Bellefonte, North Proctorville, South Point
3.	RIGHTS-OF-WAY: LENGTH / WIDTH / CIRCUITS	38 mi / 100 ft / 2 circuit
4.	VOLTAGE: DESIGN / OPERATE	138 kV/ 138 kV
5.	APPLICATION FOR CERTIFICATE:	2023
6.	CONSTRUCTION:	2024-2026
7.	CAPITAL INVESTMENT:	\$140M
8.	PLANNED SUBSTATION:	N/A
9.	SUPPORTING STRUCTURES:	Steel
10.	PARTICIPATION WITH OTHER UTILITIES	N/A
11.	PURPOSE OF THE PLANNED TRANSMISSION LINE	Rebuild of existing 138 kV line
12.	CONSEQUENCES OF LINE CONSTRUCTION DEFERMENT OR TERMINATION	Increased risk of equipment failure.
13.	MISCELLANEOUS:	Double circuit accounts for on Millbrook Park - South Point, Millbrook Park - East Wheelersburg, East Wheelersburg - Bellefonte, Bellefonte - North Proctorville, North Proctorville - South Point 138 kV
1.	LINE NAME AND NUMBER:	Groves - Shannon (s2282), TP2019017

**LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 KV (MILLBROOK PARK-
SOUTH POINT) REBUILD PROJECT**

Appendix C Property Parcel Table and Easement Form

Property Parcel Number	Agreement Type	Easement Agreement Obtained (Yes/No)
04-072-0400.000	Supplement Existing Easement	Yes
04-072-0400.002	Supplement Existing Easement	Yes
04-071-1500.000	Supplement Existing Easement	Yes
04-069-0500.000	Supplement Existing Easement	Yes
04-071-1200.000	Supplement Existing Easement	Yes
04-070-0100.000	Supplement Existing Easement	Yes
04-070-0300.000	Supplement Existing Easement	Yes
04-070-0200.000	Supplement Existing Easement	Yes
04-070-1200.000	Supplement Existing Easement	Yes
04-070-0800.000	Supplement Existing Easement	Yes
04-070-0605.000	Existing Easement Rights	Yes
04-065-0800.000	Supplement Existing Easement	No
04-065-0400.000	Supplement Existing Easement	Yes
04-065-0500.012	Supplement Existing Easement	Yes
04-065-0500.001	Supplement Existing Easement	Yes
04-064-1800.000	Supplement Existing Easement	Yes
04-065-0700.000	Supplement Existing Easement	Yes
04-064-1300.000	Supplement Existing Easement	Yes
04-064-1000.000	Supplement Existing Easement	Yes
25-0951.000	Supplement Existing Easement	Yes
25-0057.003	Supplement Existing Easement	Yes
25-0593.000	Supplement Existing Easement	No
25-0057.000	Supplement Existing Easement	Yes
25-0058.000	Supplement Existing Easement	Yes
25-0058.001	Supplement Existing Easement	Yes
25-0139.000	Supplement Existing Easement	Yes
25-0140.000	Supplement Existing Easement	Yes
25-0977.000	Supplement Existing Easement	Yes
25-0346.000	Supplement Existing Easement	Yes
25-0274.000	Existing Easement Rights	Yes
25-0640.000	Existing Easement Rights	Yes
25-1009.000	Existing Easement Rights	Yes
25-0590.000	Existing Easement Rights	Yes
25-0410.000	Supplement Existing Easement	Yes
25-0413.000	Existing Easement Rights	Yes
25-0404.000	Supplement Existing Easement	Yes
25-0376.007	Supplement Existing Easement	Yes
25-0376.006	Supplement Existing Easement	Yes
25-0376.005	Supplement Existing Easement	Yes
25-0376.004	Supplement Existing Easement	Yes
25-0376.003	Existing Easement Rights	Yes
25-0377.000	Existing Easement Rights	Yes

Property Parcel Number	Agreement Type	Easement Agreement Obtained (Yes/No)
25-0378.000	Existing Easement Rights	Yes
25-0194.001	Supplement Existing Easement	Yes
25-0994.000	Supplement Existing Easement	Yes
25-0591.001	Supplement Existing Easement	Yes
25-0591.000	Supplement Existing Easement	Yes
25-0094.000	Supplement Existing Easement	Yes
25-0451.000	Supplement Existing Easement	Yes
17-0749.000	Existing Easement Rights	Yes
17-0677.000	Existing Easement Rights	Yes
17-4510.000	Existing Easement Rights	Yes
17-4513.000	Existing Easement Rights	Yes
17-4512.000	Supplement Existing Easement	Yes
14-069-0900.000	Supplement Existing Easement	Yes
14-069-0100.000	Supplement Existing Easement	Yes
14-069-0300.000	Supplement Existing Easement	Yes
14-069-0300.001	Supplement Existing Easement	Yes
14-069-0200.000	Supplement Existing Easement	Yes
14-069-0200.001	Supplement Existing Easement	Yes
14-068-0200.000	Supplement Existing Easement	Yes
14-061-0800.000	Existing Easement Rights	Yes
14-067-1800.001	Supplement Existing Easement	Yes
14-067-1800.000	Existing Easement Rights	Yes
14-060-0500.000	Existing Easement Rights	Yes
14-060-0700.000	Existing Easement Rights	Yes
14-059-1100.001	Existing Easement Rights	Yes
14-059-1000.000	Supplement Existing Easement	Yes
14-063-0400.000	New ROW Needed	Yes
14-062-1700.000	New ROW Needed	Yes
14-058-0100.000	New ROW Needed	Yes
14-058-0400.000	New ROW Needed	Yes
14-058-0300.000	New ROW Needed	Yes
14-058-0200.000	New ROW Needed	Yes
14-056-0700.001	New ROW Needed	Yes
14-056-0700.000	Supplement Existing Easement	Yes
14-056-0600.000	Supplement Existing Easement	No
14-055-1300.000	Supplement Existing Easement	No
14-056-0200.000	Supplement Existing Easement	No
14-056-0300.000	Supplement Existing Easement	No
27-104-0600.000	Supplement Existing Easement	No
14-055-1000.000	Supplement Existing Easement	No
27-104-0700.000	Supplement Existing Easement	Yes
27-101-1600.001	Supplement Existing Easement	Yes

Property Parcel Number	Agreement Type	Easement Agreement Obtained (Yes/No)
27-101-1600.000	Existing Easement Rights	Yes
27-101-1700.001	Supplement Existing Easement	Yes
27-101-1700.004	Existing Easement Rights	Yes
27-101-1700.000	Supplement Existing Easement	Yes
27-101-1700.002	Supplement Existing Easement	Yes
27-101-1700.003	Supplement Existing Easement	Yes
27-102-0400.000	Supplement Existing Easement	Yes
27-102-0400.031	Supplement Existing Easement	Yes
27-102-0400.038	Supplement Existing Easement	Yes
27-102-0400.045	Supplement Existing Easement	Yes
27-102-0400.003	Supplement Existing Easement	Yes
27-102-0400.030	Supplement Existing Easement	Yes
27-102-0400.042	Supplement Existing Easement	Yes
27-103-0300.004	Supplement Existing Easement	Yes
27-094-0400.000	Supplement Existing Easement	Yes
27-094-0400.001	Supplement Existing Easement	Yes
27-094-0400.002	Supplement Existing Easement	Yes
27-094-0300.008	Supplement Existing Easement	Yes
27-094-0300.001	Supplement Existing Easement	Yes
27-094-1500.000	Supplement Existing Easement	Yes
27-092-0900.000	Supplement Existing Easement	Yes
27-092-1000.001	Supplement Existing Easement	Yes
27-091-0100.000	Supplement Existing Easement	No
27-091-1101.000	Supplement Existing Easement	Yes
27-091-0300.000	Supplement Existing Easement	Yes
27-092-0300.000	Supplement Existing Easement	No
27-091-1100.000	Supplement Existing Easement	Yes
27-094-1400.000	Existing Easement Rights	Yes
27-091-1300.000	Existing Easement Rights	Yes
27-062-1900.000	Supplement Existing Easement	No
27-063-1400.000, 27-063-1500.000	Supplement Existing Easement	Yes
27-069-0200.000	Supplement Existing Easement	Yes
27-069-0200.002	Supplement Existing Easement	Yes
27-069-0500.000	Supplement Existing Easement	Yes
27-073-0300.000	Supplement Existing Easement	Yes
27-074-1000.000	Supplement Existing Easement	Yes
27-075-0500.000	Supplement Existing Easement	Yes
27-076-0300.000	Supplement Existing Easement	Yes
27-075-1000.000	Supplement Existing Easement	Yes
27-074-1301.000	Supplement Existing Easement	Yes
27-074-1200.000	Supplement Existing Easement	Yes

Property Parcel Number	Agreement Type	Easement Agreement Obtained (Yes/No)
27-073-0200.000	Supplement Existing Easement	Yes
27-020-0100.000	Supplement Existing Easement	Yes
27-019-1300.000	Supplement Existing Easement	Yes
27-020-1400.000	Existing Easement Rights	Yes
27-019-0500.000	Supplement Existing Easement	Yes
27-011-1100.000	Supplement Existing Easement	Yes
27-013-1000.000	Supplement Existing Easement	No
27-013-1500.000	Supplement Existing Easement	Yes
27-014-0300.000	Supplement Existing Easement	Yes
27-014-0200.000	Supplement Existing Easement	Yes
27-014-0600.000	Existing Easement Rights	Yes
27-012-1100.000	Existing Easement Rights	Yes
27-012-1301.000	Existing Easement Rights	Yes
27-012-1300.000	Supplement Existing Easement	Yes
27-012-0600.000	Supplement Existing Easement	Yes
27-011-1800.000	Supplement Existing Easement	Yes
27-012-0100.000	Supplement Existing Easement	Yes
27-015-0800.000	Existing Easement Rights	Yes
27-015-1200.000	Supplement Existing Easement	Yes
27-015-1100.000	Supplement Existing Easement	Yes
08-001-0300.000	Supplement Existing Easement	Yes
08-002-1800.000	Supplement Existing Easement	Yes
08-002-0600.000	Supplement Existing Easement	Yes
08-002-0400.001	Supplement Existing Easement	Yes
08-001-1200.000	Supplement Existing Easement	Yes
08-002-0400.000	Supplement Existing Easement	Yes
Unknown	Unknown	No
04-052-0600.000	Supplement Existing Easement	No
04-052-0500.000	Supplement Existing Easement	No
04-073-1405.000	Supplement Existing Easement	No
04-073-1300.000	Supplement Existing Easement	No
04-073-1300.001	Supplement Existing Easement	No
04-074-0600.004	Supplement Existing Easement	No
04-074-0600.003	Supplement Existing Easement	No
04-074-0600.005	Supplement Existing Easement	No
04-074-0600.000	Supplement Existing Easement	No
04-072-0100.001	Supplement Existing Easement	No
04-072-0100.000	Supplement Existing Easement	Yes
17-4617.000	Existing Easement Rights	Yes
17-482.9000	Supplement Existing Easement	No
17-022.2000	Supplement Existing Easement	Yes
17-071.9000	Supplement Existing Easement	Yes

Property Parcel Number	Agreement Type	Easement Agreement Obtained (Yes/No)
17-0081.000	Supplement Existing Easement	Yes
17-0082.000	Supplement Existing Easement	Yes
17-0083.000	Existing Easement Rights	Yes
17-0084.000	Supplement Existing Easement	Yes
17-0085.000	Supplement Existing Easement	Yes
17-0443.000	Supplement Existing Easement	Yes
17-3777.000	Existing Easement Rights	Yes
17-0066.000	Existing Easement Rights	Yes
17-0066.003	Existing Easement Rights	Yes
17-4784.001	Supplement Existing Easement	Yes
17-0441.000	Supplement Existing Easement	Yes
17-0441.001	Existing Easement Rights	Yes
17-0647.000	Existing Easement Rights	Yes
17-0648.000	Existing Easement Rights	Yes
17-0434.000	Existing Easement Rights	Yes
17-0295.000	Existing Easement Rights	Yes
17-0435.000	Existing Easement Rights	Yes
17-0611.000	Existing Easement Rights	Yes
17-0290.001	Existing Easement Rights	Yes
17-0290.000	Existing Easement Rights	Yes
17-0698.002	Existing Easement Rights	Yes
17-0698.004	Existing Easement Rights	Yes
17-0698.000	Existing Easement Rights	Yes
17-0298.001	Existing Easement Rights	Yes
17-0633.000	Existing Easement Rights	Yes
16-0133.004	Existing Easement Rights	Yes
16-0340.000	Existing Easement Rights	Yes
16-0032.000	Existing Easement Rights	Yes
16-0133.008	Existing Easement Rights	Yes
16-0133.003	Existing Easement Rights	Yes
16-0133.000	Existing Easement Rights	Yes
16-0133.006	Existing Easement Rights	Yes
16-0133.007	Existing Easement Rights	Yes
16-0133.001	Existing Easement Rights	Yes
16-1472.000	Existing Easement Rights	Yes
16-1451.000	Existing Easement Rights	Yes
16-0148.000	Existing Easement Rights	Yes
16-0186.000	Existing Easement Rights	Yes
16-0187.000	Supplement Existing Easement	Yes
16-0092.000	Supplement Existing Easement	Yes
16-1079.000	Supplement Existing Easement	Yes
16-0693.000	Supplement Existing Easement	Yes

Property Parcel Number	Agreement Type	Easement Agreement Obtained (Yes/No)
07-066-0700.000	Supplement Existing Easement	Yes
07-066-0600.002	New ROW Needed	Yes
07-054-0605.000	Supplement Existing Easement	Yes
07-055-0900.001	Existing Easement Rights	Yes
07-055-1400.000, 07-055-1401.000	New ROW Needed	Yes
07-056-1800.000, 07-056-1801.000	Supplement Existing Easement	Yes
07-056-0400.000	New ROW Needed	Yes
07-056-1200.000	Supplement Existing Easement	Yes
07-055-1501.000	New ROW Needed	Yes
07-056-1000.000, 07-056-1100.000	Supplement Existing Easement	Yes
07-055-1503.001	Supplement Existing Easement	Yes
07-055-1504.001	New ROW Needed	Yes
07-056-0300.000	Supplement Existing Easement	Yes
06-071-1000.000	Existing Easement Rights	Yes
06-071-1100.001	Existing Easement Rights	Yes
06-072-1600.000	Existing Easement Rights	Yes
06-071-0600.000	Existing Easement Rights	Yes
06-071-0900.000	Existing Easement Rights	Yes
06-071-0300.000	Supplement Existing Easement	Yes
06-069-1100.000	Supplement Existing Easement	Yes
06-069-1200.000	Supplement Existing Easement	Yes
06-070-1400.000	Supplement Existing Easement	Yes
06-069-1000.001	Supplement Existing Easement	Yes
06-069-1000.000	Supplement Existing Easement	Yes
06-069-0900.000	Supplement Existing Easement	Yes
06-069-0700.000	Supplement Existing Easement	Yes
15-123-1800.000	Supplement Existing Easement	Yes
06-069-0400.000	New ROW Needed	Yes
15-123-1700.000	Supplement Existing Easement	Yes
15-123-1400.000	Supplement Existing Easement	Yes
15-135-1800.000	Existing Easement Rights	Yes
15-135-1700.000	Existing Easement Rights	Yes
15-109-1600.000	Supplement Existing Easement	Yes
15-114-0300.000	Supplement Existing Easement	Yes
15-118-1400.000	Existing Easement Rights	Yes
15-106-1100.000	Supplement Existing Easement	Yes
15-106-0801.000	Supplement Existing Easement	Yes
15-105-0800.000	New ROW Needed	Yes
15-106-1000.000	New ROW Needed	Yes

Property Parcel Number	Agreement Type	Easement Agreement Obtained (Yes/No)
15-106-0800.000	New ROW Needed	Yes
15-106-0800.001	New ROW Needed	Yes
15-106-0900.000	New ROW Needed	Yes
15-101-1500.000	New ROW Needed	Yes
15-100-1300.000	New ROW Needed	Yes
15-100-1200.000	New ROW Needed	No
15-100-1800.003	New ROW Needed	Yes
15-100-1800.000	New ROW Needed	No
15-108-0100.000	Supplement Existing Easement	Yes
15-087-1300.000	Supplement Existing Easement	No
15-089-0900.001	Supplement Existing Easement	Yes
15-095-1300.004	Supplement Existing Easement	Yes
15-095-1300.000	Existing Easement Rights	Yes
15-095-1500.000	Supplement Existing Easement	Yes
15-091-0300.000	Supplement Existing Easement	Yes
15-091-0700.000	Supplement Existing Easement	Yes
15-091-0800.000	Supplement Existing Easement	Yes
15-090-1600.000	Supplement Existing Easement	Yes
15-090-0400.000	Supplement Existing Easement	Yes
15-090-0300.000	Supplement Existing Easement	Yes
15-090-0102.000	Supplement Existing Easement	Yes
15-089-1500.000	Supplement Existing Easement	Yes
14-024-1100.000	Existing Easement Rights	Yes
14-024-1200.003	Existing Easement Rights	Yes
14-024-0900.001	Existing Easement Rights	Yes
14-024-0900.000	Existing Easement Rights	Yes
14-021-0501.000	Existing Easement Rights	Yes
14-024-0800.000	Existing Easement Rights	Yes
14-024-0700.000	Supplement Existing Easement	Yes
14-024-0700.001	Supplement Existing Easement	Yes
14-021-1200.002	Supplement Existing Easement	Yes
14-021-1200.000	Supplement Existing Easement	Yes
14-021-1200.001	Supplement Existing Easement	Yes
14-021-1200.003	Supplement Existing Easement	Yes

Original Line Name: Ironton - Portsmouth
Original Line No.: TLN160:00058
Line Name: Millbrook Park – South Point
Line No.: TLN380:OH279
Easement No.:

SUPPLEMENTAL EASEMENT AND RIGHT OF WAY

WHEREAS, Ohio Power Company, an Ohio corporation, a unit of American Electric Power, whose principal business address is 1 Riverside Plaza, Columbus, Ohio 43215 (“AEP”) is the owner of an easement agreement dated [Month], [Day], [Year] and recorded at Volume [X], Page [X], of the [County] County Recorder’s Office (the “Original Easement”).

On this _____ day of _____, 20__, in consideration of Ten and NO/100 Dollars (\$10.00), and other valuable consideration, the receipt and sufficiency of which is hereby acknowledged, and the covenants hereinafter set forth, [Landowner(s)], married / unmarried / marital status unknown, whose address is [mailing address] (“Grantor”), whether one or more persons, hereby grants, sells, conveys, and warrants to Ohio Power Company, an Ohio corporation, a unit of American Electric Power, whose principal business address is 1 Riverside Plaza, Columbus, Ohio 43215 (“AEP”) and its successors and affiliates, a supplemental permanent easement and right of way (“Easement”) for a single electric transmission line not to exceed 138 kV, [for distribution purposes,] and for internal communication purposes related to the supply of electricity (the “Transmission Line”), being, in, on, over, under, through and across the following described lands of Grantor, situated in the State of Ohio, County of [County], and Township of [Township] and being a part of [Legal Description from easement or title report] (“Grantor’s Property”).

[Names of all dower interest parties] join herein for the purpose of releasing all dower rights in regard to the Easement.

Grantor claims title by [name of vesting instrument] dated x/xx/xxxx from [insert name of first grantor, et al.], recorded on x/xx/xxxx in [record volume, page] in the [County] County Recorder’s Office.

Auditor/Key/Tax Number: [Insert Parcel Information]

The Easement Area is more fully described and depicted on Exhibit “A”, a copy of which is attached hereto and made a part hereof (“Easement Area”).

Grantor and AEP each acknowledge that Grantor’s Property, as identified herein, contains existing electric lines and related facilities and infrastructure installed thereon that are currently operated by AEP pursuant to an easement agreement dated [month], [day], [year] and recorded at Volume [X], Page [X] of the [County] County Recorder’s Office. Upon completion of construction, removal of all de-energized transmission line infrastructure, and restoration activities in both the Easement Area and in the easement area to be released, each as identified on the attached Exhibit “A,” and so long as the new line within the Easement Area is the sole energized line in both the Easement Area and in the easement area to be released, AEP’s right, title and interest in the area designated for release on the attached Exhibit “A” will automatically terminate and revert to Grantor.

Upon completion of construction, removal of all de-energized transmission line infrastructure, and restoration activities in both the Easement Area and in the easement area to be released, each as identified on the attached Exhibit “A,” and so long as the new line within the Easement Area is the sole energized line in both the Easement Area and in the easement area to be released, AEP’s right, title and interest in the portion of the Original Easement area designated as “Easement Area Released” on the attached Exhibit “A” will automatically terminate and revert to Grantor.

GRANTOR FURTHER GRANTS AEP THE FOLLOWING RIGHTS:

The right, now or in the future, to construct, reconstruct, operate, maintain, alter, improve, inspect, patrol, protect, repair, remove, replace, upgrade and relocate within the Easement Area, structures and appurtenant equipment necessary for the Transmission Line.

The right, in AEP’s discretion, now or in the future, to cut down, trim or remove, and otherwise control, any and all trees, overhanging branches, vegetation or brush situated within the Easement Area and any temporary access roads or temporary workspaces identified on Exhibit “A” outside the Easement Area. Provided, however, that AEP shall not use herbicides or similar products for these purposes on any portions of the Grantor’s Property maintained for residential or agricultural use. AEP shall also have the right to cut down, trim or remove trees situated on Grantor’s Property which adjoin the Easement Area within the Tree Protection Zone when in the reasonable opinion of AEP those trees are dead, dying, diseased, leaning, or structurally defective and may endanger the safety of, or interfere with the construction, operation or maintenance of AEP’s facilities or ingress or egress to, from or along the Easement Area. The Tree Protection Zone extends eighty feet on all sides of the Easement Area depicted in Exhibit A.

AEP shall also have the right of reasonable ingress and egress over, across and upon the Easement Area only, unless additional access routes are depicted in the attached Exhibit A. Provided, however, that in the event access over, across and upon the Easement Area – and access routes, if any, shown in Exhibit A – shall become blocked or otherwise rendered unsafe or hazardous for use, AEP may temporarily access the Easement Area from other points across Grantor’s Property, so long as that access is both reasonable and limited to the duration of the interference or safety hazard. AEP shall return the access area to its preexisting condition or pay damages to Grantor.

AEP shall also have the right to use temporary workspaces and temporary access roads outside the Easement Area, if any are shown on Exhibit A, in connection with its initial construction of the Transmission Line. AEP may shift the location of such temporary workspaces and/or temporary access roads, if any, up to twenty (20) feet in any direction, as field conditions or other requirements dictate. Upon completion of the overall Transmission Line project, but in no event later than two (2) years following the start of construction on Grantor's Property, AEP shall remove its equipment from all such temporary workspaces and temporary access roads outside the Easement Area, and AEP's temporary rights outside of the Easement Area shall automatically cease, terminate and revert to Grantor. AEP shall return any such areas to their preexisting condition or pay damages to Grantor as soon as practicable.

THIS GRANT IS SUBJECT TO THE FOLLOWING CONDITIONS:

Grantor reserves the right to cultivate annual crops, pasture, construct fences (provided gates are installed that adequately provide AEP the access rights conveyed herein) and roads or otherwise use Grantor's Property encumbered by this Easement in any way not inconsistent with the rights herein granted. In no event, however, shall Grantor, its heirs, successors, affiliates and assigns plant or cultivate any trees or place, construct, install, erect or permit any temporary or permanent building, structure, improvement or obstruction including but not limited to, storage tanks, billboards, signs, sheds, dumpsters, light poles, water impoundments, above ground irrigation systems, swimming pools or wells, or permit any alteration of the ground elevation, over, or within the Easement Area. AEP may, at Grantor's cost, remove any structure or obstruction if placed within the Easement Area, and may re-grade any alterations of the ground elevation within the Easement Area.

AEP agrees to repair or pay Grantor for actual damages sustained by Grantor to crops, fences, gates, irrigation and drainage systems, drives, or lawns that are permitted herein, when such damages arise out of AEP's exercise of the rights herein granted.

Pursuant to R.C. 163.02, Grantor possesses a right of repurchase pursuant to R.C. 163.211 if AEP decides not to use Grantor's Property for the purpose stated in the appropriation petition and Grantor provides timely notice of a desire to repurchase.

[Except as supplemented and amended herein, the Original Easement shall remain in full force and effect, and the Original Easement shall keep its priority in title as of the date of its recording.] This instrument [and the Original Easement] contains the complete agreement, expressed or implied between the parties herein and shall inure to the benefit of and be binding on their respective successors, affiliates, heirs, executors, and administrators.

This Easement may be executed in counterparts, each of which shall be deemed an original, but all of which, taken together, shall constitute one and the same instrument.

Any remaining space on this page left intentionally blank. See next page(s) for signature(s).

IN WITNESS WHEREOF, said Grantor have hereunto set their hand(s) and seal(s) as of the last date set forth below.

GRANTOR

[FOR A BUSINESS ENTITY / TRUST]

[name of entity/trust with kind of business association identified]

By: _____

Print name: _____

Its Authorized Signer

State of Ohio

§

§ SS:

County of _____ §

This instrument was acknowledged before me on this _____ day of _____, 20____ by _____, the _____ of [entity/trust], a/an [state of incorporation] [type of entity/trust], on behalf of [entity/trust].

Notary

[FOR AN INDIVIDUAL]

[name of individual]

State of Ohio

§

§ SS:

County of _____ §

This instrument was acknowledged before me on this _____ day of _____, 20____ by [name of individual].

Notary

This instrument prepared by Marland Turner, American Electric Power Service Corporation, 1 Riverside Plaza, Columbus, OH 43215 for and on behalf of Ohio Power Company, a unit of American Electric Power.

When recorded return to: American Electric Power – Transmission Right of Way, 8600 Smith's Mill Road, New Albany, OH 43054.

**LETTER OF NOTIFICATION FOR SOUTH POINT-PORTSMOUTH 138 KV (MILLBROOK PARK-
SOUTH POINT) REBUILD PROJECT**

Appendix D Agency Correspondence

APPENDIX D Agency Correspondence

USFWS and ODNR Correspondence Structure 26-South Point 138 kV Line Rebuild Section

From: [Ohio, FW3](#)
To: [Gillette, Tyler](#)
Cc: nathan.reardon@dnr.state.oh.us; [Parsons, Kate](#); [Teitt, Matthew](#); [Grant S Stuller](#)
Subject: Proposed AEP's Structure 26 – South Point 138 kV Line Rebuild Project in Lawrence County, Ohio
Date: Wednesday, April 13, 2022 2:55:00 PM
Attachments: [image.png](#)
[image.png](#)



UNITED STATES DEPARTMENT OF THE INTERIOR
U.S. Fish and Wildlife Service
Ecological Services Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / Fax (614) 416-8994



Project Code: 2022-0012778

Dear Mr. Gillette,

The U.S Fish and Wildlife Service (Service) has received your recent correspondence requesting information about the subject proposal. We offer the following comments and recommendations to assist you in minimizing and avoiding adverse impacts to threatened and endangered species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA).

Federally Threatened and Endangered Species: The endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and breed that may also include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. Roost trees for both species include live and standing dead trees ≥ 3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves, rock crevices and abandoned mines.

Seasonal Tree Clearing for Federally Listed Bat Species: Should the proposed project site contain trees ≥ 3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, we recommend removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see <http://www.fws.gov/midwest/endangered/mammals/nleb/index.html>), incidental take of

Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present.

If implementation of this seasonal tree cutting recommendation is not possible, a summer presence/absence survey may be conducted for Indiana bats. If Indiana bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

Section 7 Coordination: If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus it is important to conserve the functions and values of the remaining wetlands in Ohio (https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf). We recommend avoiding and minimizing project impacts to all wetland habitats (e.g., forests, streams, vernal pools) to the maximum extent possible in order to benefit water quality and fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the U.S. Army Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. Disturbed areas should be mulched and revegetated with native plant species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, coordination with the Service should be initiated to assess any potential impacts.

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, Acting Environmental Services Administrator, at (614) 265-6387 or at mike.pettegrew@dnr.state.oh.us.

If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or ohio@fws.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrice Ashfield". The signature is fluid and cursive, with the first name "Patrice" and last name "Ashfield" clearly distinguishable.

Patrice Ashfield
Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW
Kate Parsons, ODNR-DOW



Ohio Department of Natural Resources

MIKE DEWINE, GOVERNOR

MARY MERTZ, DIRECTOR

Office of Real Estate

John Kessler, Chief

2045 Morse Road – Bldg. E-2

Columbus, OH 43229

Phone: (614) 265-6621

Fax: (614) 267-4764

April 20, 2022

Matthew Teitt
Stantec
1500 Lake Shore Drive Suite 100
Columbus OH43204-3800

Re: 22-0301; AEP Structure 26 - South Point Line Rebuild Project

Project: The proposed project includes the rebuild of an existing 138 kV transmission line.

Location: The proposed project is located in Perry Township, Lawrence County Ohio.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

Natural Heritage Database: The Natural Heritage Database has the following data at or within one mile of the project area:

Virginia Dwarf-dandelion (*Krigia virginica*), T
Maypop (*Passiflora incarnata*), T
Gray Beard-tongue (*Penstemon canescens*), T
Coville's Scorpionweed (*Phacelia covillei*), E
Southern Pearlwort (*Sagina decumbens*), E
Green Salamander (*Aneides aeneus*), E
Shoal chub (*Macrhybopsis hyostoma*), E
Channel Darter (*Percina copelandi*), T
River Darter (*Percina shumardi*), T
Eastern Spadefoot (*Scaphiopus holbrookii*), E
Black Sandshell (*Ligumia recta*), T

The review was performed on the specified project area as well as an additional one-mile radius. Records searched date from 1980. Conservation status abbreviations are as follows: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; U = state status under review; X = presumed extirpated in Ohio; FE = federally endangered, and FT = federally threatened.

ODNR appreciates the opportunity to provide these comments. Please contact Mike Pettegrew at mike.pettegrew@dnr.ohio.gov if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator

From: [Godec, Daniel](#)
To: Richard.Gardner@dnr.ohio.gov
Cc: [Shannon T Hemmerly](#)
Subject: Gray Beardtongue Locations Shapefiles Request - AEP Structure 26-South Point and Ironwood Switch-Structure 26 138 kV Line Rebuild Projects
Date: Friday, April 21, 2023 12:52:00 PM
Attachments: [TE_Map_Vascular_Plants_Millbrook_Park-South_Point_138_kV_Line_Rebuild_AEP.pdf](#)
[22-0302- Stantec - AEP Ironwood Switch-Structure 26 Line Rebuild Project Comments.pdf](#)
[22-0301- Stantec - AEP Structure 26 - South Point Line Rebuild Project Comments.pdf](#)

Hello Rick,

As discussed during our call earlier today, can you please send us GIS shapefiles with the locations of gray beardtongue that were previously documented within the Structure 26-South Point and Ironwood Switch-Structure 26 portions of the Millbrook Park-South Point 138 kV Line Rebuild Project, as mentioned in the attached ODNR environmental review response letters? Also, if the ODNR completes additional surveys in 2023 for gray beardtongue within the Wayne National Forest portion of the Ironwood-Switch-Structure 26 138 kV Line Rebuild Project, can you please send us GIS shapefiles with the locations of gray beardtongue individuals/populations you find during those surveys?

Thanks in advance for your help!

Dan

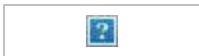
Dan Godec

Senior Environmental Project Manager

Direct: 513 842-8200

Mobile: 513 265-9763

Daniel.Godec@stantec.com



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From: Nathan.Reardon@dnr.ohio.gov
To: [Godec, Daniel](#)
Cc: Ann.Schweitzer@dnr.ohio.gov; Mike.Pettegrew@dnr.ohio.gov; [Shannon T Hemmerly](#)
Subject: RE: Additional Coordination Regarding Green Salamander - ODNR Project Numbers 22-0301 and 22-0302
Date: Friday, October 27, 2023 7:58:41 AM
Attachments: [image008.png](#)
[image005.png](#)
[image007.png](#)
[image002.png](#)
[image006.png](#)

Hi Dan,

The DOW appreciates AEP's and Stantec's efforts to ensure that the green salamander is not impacted by the transmission line rebuild project. The DOW concurs with Mr. Davis's assessment that because the green salamander was not detected during the survey effort, the green salamander is not likely present in the project area. Therefore, impacts to this species are not likely. No additional avoidance/minimization measures or further coordination is warranted.

Thank you,
Nathan

Nathan Reardon
Compliance Coordinator
ODNR Division of Wildlife
2045 Morse Road
Columbus, OH 43229
Phone: 614-265-6741
Email: nathan.reardon@dnr.ohio.gov

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From: Godec, Daniel <Daniel.Godec@stantec.com>
Sent: Tuesday, October 24, 2023 2:47 PM
To: Reardon, Nathan <Nathan.Reardon@dnr.ohio.gov>
Cc: Schweitzer, Ann <Ann.Schweitzer@dnr.ohio.gov>; Pettegrew, Mike <Mike.Pettegrew@dnr.ohio.gov>; Shannon T Hemmerly <sthemmerly@aep.com>
Subject: RE: Additional Coordination Regarding Green Salamander - ODNR Project Numbers 22-0301 and 22-0302

Hello Nathan,

Based on your September 12, 2023 email below and at the request of AEP, Stantec subcontracted ODNR-approved herpetologist Jeff Davis to complete green salamander presence/absence surveys within the potentially suitable green salamander habitat he identified within the Ironwood Switch-Structure 26 138 kV Line Rebuild Project (ODNR Project No. 22-302). No green salamanders were found by Mr. Davis during these presence/absence surveys. Attached are the green salamander presence/absence survey report and a cover letter summarizing these surveys and results.

Please review these items when you have the time and let us know if you concur with Mr. Davis's findings and recommendations.

Thanks again for your assistance!

Dan

Dan Godec
Senior Environmental Project Manager
Direct: 513 842-8203
Mobile: 513 265-9763
Daniel.Godec@stantec.com



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From: Nathan.Reardon@dnr.ohio.gov <Nathan.Reardon@dnr.ohio.gov>
Sent: Tuesday, September 12, 2023 10:57 AM
To: Godec, Daniel <Daniel.Godec@stantec.com>
Cc: Ann.Schweitzer@dnr.ohio.gov; Mike.Pettegrew@dnr.ohio.gov; Shannon T Hemmerly <sthemmerly@aep.com>
Subject: RE: Additional Coordination Regarding Green Salamander - ODNR Project Numbers 22-0301 and 22-0302

Hello Dan,

Because tree clearing within the transmission line right-of-way will extend to the top of the cliff, the DOW recommends a presence/absence survey be conducted within the identified green salamander habitat. However, if a buffer can be implemented to maintain a canopy over the cliff face, a survey would not be warranted. Also, if Jeff Davis believes that the amount and extent of tree clearing does not have the potential to alter the potential habitat along the cliff face, a survey would not be warranted.

Thank you,
Nathan

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From: Godec, Daniel <Daniel.Godec@stantec.com>
Sent: Tuesday, September 5, 2023 12:45 PM
To: Reardon, Nathan <Nathan.Reardon@dnr.ohio.gov>
Cc: Schweitzer, Ann <Ann.Schweitzer@dnr.ohio.gov>; Pettegrew, Mike <Mike.Pettegrew@dnr.ohio.gov>; Shannon T Hemmerly <sthemmerly@aep.com>
Subject: RE: Additional Coordination Regarding Green Salamander - ODNR Project Numbers 22-0301 and 22-0302

Hello Nathan,

Just following up on this email from August 23 to see if you had any other comments or questions regarding the green salamander and this project.

Thanks,

Dan

From: Godec, Daniel
Sent: Wednesday, August 23, 2023 12:08 PM
To: Nathan.Reardon@dnr.ohio.gov
Cc: Ann.Schweitzer@dnr.ohio.gov; Mike.Pettegrew@dnr.ohio.gov; Shannon T Hemmerly <sthemmerly@aep.com>
Subject: RE: Additional Coordination Regarding Green Salamander - ODNR Project Numbers 22-0301 and 22-0302

Hello Nathan,

Shannon and I discussed this today and it does sound like tree clearing within the transmission line right-of-way will extend south to the top

of the cliff but it won't be required beyond the cliff within the cove area with the potential green salamander habitat. The hatched areas/tree clearing avoidance areas shown in the screenshot below do overlap the potential green salamander habitat.

Let us know if you have any other questions or comments.

Thanks,

Dan

From: Godec, Daniel

Sent: Tuesday, August 8, 2023 11:34 AM

To: Nathan.Reardon@dnr.ohio.gov

Cc: Ann.Schweitzer@dnr.ohio.gov; Mike.Pettegrew@dnr.ohio.gov; Shannon T Hemmerly <sthemmerly@aep.com>

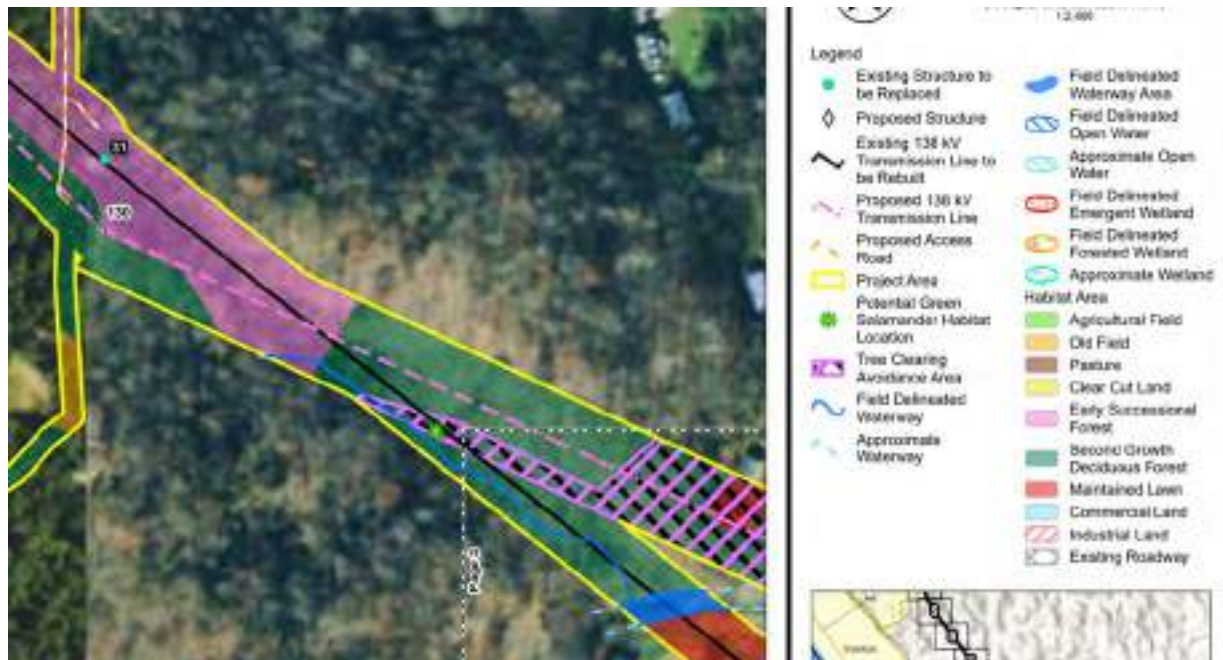
Subject: RE: Additional Coordination Regarding Green Salamander - ODNR Project Numbers 22-0301 and 22-0302

Hello Nathan,

As seen on page 4 of the attached map set and in the screenshot below, there is a tree clearing avoidance area that overlaps the cliff area and cove with the potential green salamander habitat. Shannon appears to be on vacation this week, but I will discuss this with her when she gets back from vacation to see how much of a buffer there is that is between the cliff face and the proposed right-of-way tree clearing areas and we will get back to you with our findings.

Thanks,

Dan



From: Nathan.Reardon@dnr.ohio.gov <Nathan.Reardon@dnr.ohio.gov>

Sent: Tuesday, August 8, 2023 8:08 AM

To: Godec, Daniel <Daniel.Godec@stantec.com>

Cc: Ann.Schweitzer@dnr.ohio.gov; Mike.Pettegrew@dnr.ohio.gov; Shannon T Hemmerly <sthemmerly@aep.com>

Subject: RE: Additional Coordination Regarding Green Salamander - ODNR Project Numbers 22-0301 and 22-0302

Dan,

Thank you for the information. Will the tree clearing extend right to the top of the cliff face? Or is there an opportunity to maintain a buffer between the tree clearing and the cliff face. If a buffer can be maintained, impacts to green salamander habitat would be unlikely, and no further action would be warranted.

Thank you,
Nathan

Nathan Reardon
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From: Godec, Daniel <Daniel.Godec@stantec.com>
Sent: Thursday, August 3, 2023 1:01 PM
To: Reardon, Nathan <Nathan.Reardon@dnr.ohio.gov>
Cc: Schweitzer, Ann <Ann.Schweitzer@dnr.ohio.gov>; Pettegrew, Mike <Mike.Pettegrew@dnr.ohio.gov>; Shannon T Hemmerly <sthemmerly@aep.com>
Subject: RE: Additional Coordination Regarding Green Salamander - ODNR Project Numbers 22-0301 and 22-0302

Hello Nathan,


I have circulated your questions highlighted below to the project team and they have confirmed that tree clearing will be confined to the top of the cliff face of the east wall and that no tree clearing will be necessary within the cove-like hollow.

Let us know if you have any other questions or if you need any other information at this time.

Thanks,

Dan

Dan Godec
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From: Nathan.Reardon@dnr.ohio.gov <Nathan.Reardon@dnr.ohio.gov>
Sent: Thursday, August 3, 2023 10:21 AM
To: Godec, Daniel <Daniel.Godec@stantec.com>
Cc: Ann.Schweitzer@dnr.ohio.gov; Mike.Pettegrew@dnr.ohio.gov
Subject: RE: Additional Coordination Regarding Green Salamander - ODNR Project Numbers 22-0301 and 22-0302

Hello Dan,

In reviewing the area identified as suitable habitat (AOI 1) by Mr. Davis, and "Figure 2 Potential Green Salamander Habitat Map" of where tree removal will be necessary, it appears that tree clearing will be necessary within close proximity to the suitable habitat.

Will tree clearing be confined to the top of the cliff face of the east wall as seen in Figure 5.A (page 10) of Mr. Davis report? Or will also be necessary within the cove-like hollow of AOI 1? A concern here will be that tree removal may create dryer conditions along the cliff face, reducing the amount of suitable habitat in the area, which may impact the green salamander if they are present.

Thank you,

Nathan

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From: Godec, Daniel <Daniel.Godec@stantec.com>

Sent: Thursday, July 27, 2023 4:26 PM

To: Pettegrew, Mike <Mike.Pettegrew@dnr.ohio.gov>

Cc: Shannon T Hemmerly <sthemmerly@aep.com>

Subject: FW: Additional Coordination Regarding Green Salamander - ODNR Project Numbers 22-0301 and 22-0302

Hello Mike,

On behalf of American Electric Power (AEP) and as requested in the attached Ohio Department of Natural Resources (ODNR) Environmental Review request response letters for the Structure 26-South Point 138 kV Line Rebuild Project (ODNR Project No. 22-301) and Ironwood Switch-Structure 26 138 kV Line Rebuild Project (ODNR Project No. 22-302), ODNR-approved herpetologist Jeff Davis completed habitat assessment field surveys for potential green salamander (*Aneides aeneus*; state-listed endangered) habitat within these project areas. Attached is the green salamander habitat assessment report prepared by Mr. Davis. The ODNR Environmental Review response letters also stated that the Natural Heritage Database has known records of the green salamander within one mile of these project areas.

No potential green salamander habitat was identified within the Structure 26-South Point 138 kV Line Rebuild Project area. One area of potential green salamander habitat (described as Area of Interest 1 in the attached green salamander habitat assessment report), consisting of cliffs with horizontal cracks and crevices, was identified by Mr. Davis within the Ironwood Switch-Structure 26 138 kV Line Rebuild Project area. The location of this potential green salamander habitat is shown on the attached project location map (Figure 1) and Potential Green Salamander Habitat Map (Figure 2). Figure 2 also shows the locations of vegetation communities and forested habitats located within the Ironwood Switch-Structure 26 Project area. Areas where tree clearing will not be required are shown as Tree Clearing Avoidance Areas, one of which overlaps the area of potential green salamander habitat identified by Mr. Davis.

No impacts to the actual potential green salamander habitat (cliffs with horizontal cracks and crevices/Area of Interest 1) will be required for construction activities associated with the project. Therefore, we are requesting your concurrence that green salamander presence/absence surveys will not be warranted/required for the project prior to initiation of tree clearing and construction activities.

Thanks in advance for your assistance!

Dan

Dan Godec

Senior Environmental Project Manager

Direct: 513 842-8200

Mobile: 513 265-9763

Daniel.Godec@stantec.com

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From: Nathan.Reardon@dnr.ohio.gov
To: [Godec, Daniel](#)
Cc: Ann.Schweitzer@dnr.ohio.gov; Mike.Pettegrew@dnr.ohio.gov; sthemmerly@aep.com
Subject: RE: Additional Coordination Regarding Timber Rattlesnake - ODNR Project Numbers 22-0300, 22-0302, and 22-0303
Date: Thursday, August 3, 2023 8:39:45 AM
Attachments: [image002.gif](#)
[image001.png](#)

Hello Dan,

The DOW concurs with Mr. Wynn's habitat suitability assessment. In addition, the DOW concurs that the mitigation measures outlined in the report are sufficient in avoiding and/or minimizing impacts to the timber rattlesnake. Please continue to coordinate with Mr. Wynn. If there are any questions, please let me know.

Thank you,
Nathan

Nathan Reardon
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From: Godec, Daniel <Daniel.Godec@stantec.com>
Sent: Thursday, July 27, 2023 4:29 PM
To: Pettegrew, Mike <Mike.Pettegrew@dnr.ohio.gov>
Cc: Shannon T Hemmerly <sthemmerly@aep.com>
Subject: Additional Coordination Regarding Timber Rattlesnake - ODNR Project Numbers 22-0300, 22-0302, and 22-0303

Hello Mike,

On behalf of American Electric Power (AEP) and as requested in the attached Ohio Department of Natural Resources (ODNR) Environmental Review request response letters for the Millbrook Park-East Wheelersburg 138 kV Line Rebuild Project (ODNR Project No. 22-300), Ironwood Switch-Structure 26 138 kV Line Rebuild Project (ODNR Project No. 22-302), and East Wheelersburg-Ironton 138 kV Line Rebuild Project (ODNR Project No. 22-303), ODNR-approved herpetologist Doug Wynn completed a habitat suitability survey for potential timber rattlesnake (*Crotalus horridus horridus*; state-listed endangered) habitat within these project areas. Attached is the timber rattlesnake habitat suitability

survey report prepared by Mr. Wynn. The ODNR Environmental Review response letters did not state that the Natural Heritage Database has known records of the timber rattlesnake within one mile of these project areas.

As outlined in the attached report, Mr. Wynn only identified potential timber rattlesnake habitat within the Wayne National Forest between existing structures 61 and 72 in the Ironwood Switch-Structure 26 138 kV Line Rebuild Project area. The location of this potential timber rattlesnake habitat is shown on page 8 of the attached timber rattlesnake habitat suitability report and on the attached project location map (Figure 1). The attached potential timber rattlesnake habitat map (Figure 2) also shows the location of the potential timber rattlesnake habitat identified by Mr. Wynn as well as the locations of vegetation communities/habitat types present within this area of potentially suitable timber rattlesnake habitat. Mr. Wynn did not identify any potentially suitable timber rattlesnake habitat within the Millbrook Park-East Wheelersburg 138 kV Line Rebuild Project area or the East Wheelersburg-Ironton 138 kV Line Rebuild Project area.

Mr. Wynn recommend that the removal and replacement of the existing structures 61-72 be done in the offseason for timber rattlesnakes. That is roughly the time period between November 1 and April 15. Mr. Wynn stated that if the construction activities in that area take place during that timeframe, then no mitigation would be necessary as the snakes would be underground. If that is not possible (construction would occur between April 15 and November 1), then the following items are suggested by Mr. Wynn when the proposed line removal and replacement begin:

- 1). An ODNR-approved herpetologist should conduct a brief orientation on timber rattlesnakes for the workers to cover safety issues, explain our activities and answer questions. This should ideally involve the use of a live timber rattlesnake. The orientation should be repeated as new workers arrive at the construction sites;
- 2). The approved herpetologists should give construction personnel our contact information and encourage them to contact us if a rattlesnake is sighted;
- 3). The construction supervisor should provide the approved herpetologists with their work plans every morning so that the herpetologists can implement the safety procedures;
- 4). The approved herpetologists will survey the sites in the mornings before construction begins to "clear" the sites. This will become more important as the season progresses and the snakes emerge from their dens. The approved herpetologists will continually clear the roads throughout each day that construction or vehicle movement occurs. At the end of each day of construction an approved herpetologist will survey each road to determine if any mortalities occurred;
- 5). Any staging or preparation areas need to be identified to the approved herpetologist so that precautions to protect workers or snakes can be taken if necessary;
- 6). Any potential sensitive habitats will be flagged to indicate an area of no disturbance and those areas should be clearly identified and discussed with any construction supervisors. Potential dens must be treated with caution and dealt within a case by case manner. Many factors would need to be considered including their characteristics and the time of the year;
- 7). After the structures are constructed, additional workers may haul out the old towers and other sets of workers may restore the habitats. Thus, many of the above protocols may need to be repeated with the new activities and workers;
- 8). If a timber rattlesnake is captured or observed any subsequent actions will be conducted on a case by case basis – depending upon the situation and experiences of the approved herpetologists. The snake may be surgically implanted with a transmitter to monitor its location. Arrangements will have been made for transmitters and surgical equipment to be on standby. This will not involve any additional costs and will be consistent with procedures that are supported and approved by the ODNR Division of Wildlife at other sites throughout Ohio;
- 9). If requested, the approved herpetologists will provide information for status reports that may be submitted to AEP. As with any project involving an endangered species, the approved herpetologists will provide the ODNR Division of Wildlife with either formal or informal status reports in response to their inquiries; and
- 10). The approved herpetologist will determine and have knowledge of the nearest medical facilities and important phone numbers in the event of a Timber Rattlesnake bite.

We are requesting your concurrence on the timber rattlesnake habitat suitability surveys and findings outlined in Mr. Wynn's report, as well as concurrence on Mr. Wynn's mitigation recommendations if the project construction activities between the existing structures 61 and 72 cannot be completed between November 1 and April 15. Thanks in advance for your assistance!

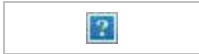
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Senior Environmental Project Manager

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Mobile: 513 265-9763

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