

RECEIVED-DOCKETING DIV

July 12, 2012

2012 JUL 31 PM 1:43

To whom it may concern:

This letter is in reference to the proposed Elk Transmission Line (case 11-4505-EL-BTX) in Vinton County Ohio.

PU600
11-4505-EL-BTX

In August 2011, AEP held a public meeting for affected property owners in the Vinton County Community Building. Shortly before that meeting, AEP submitted an application for a waiver to the route commonality rule for choosing alternative routes (where no two candidate routes can have more than 20% in common). Included with the application for waiver was a supporting memorandum (<http://dis.puc.state.oh.us/DocumentRecord.aspx?DocID=d7813bd4-2e9f-4fda-86b6-3f93609aa7ac>). The document is located here: (<http://dis.puc.state.oh.us/ViewImage.aspx?CMID=A1001001A11H03B15148A33006>). No two of the eight candidate routes have less than 40% commonality. The routes chosen as alternatives (routes 1 and 2) in the application for waiver both include legs of new right-of-way largely parallel to US Route 50 (between points A and B as noted in the memorandum) and have 80% commonality.

An "impact study" for the eight candidate routes is included in the memorandum. Quantitative scoring for each of the following areas are detailed: ecological, cultural, land use, and engineering. Routes 1, 2, 3, and 4 as listed in the memorandum include leg A to B and require new rights-of-way along the entire length of leg A-B. Routes 5, 6, 7, and 8 largely follow existing rights-of-way. The quantitative scoring indicates routes 1 and 2 as the best. How can the "impacts" be more severe along existing rights-of-way (that have already felt the impact, will continue to feel the impact, even if those rights-of-way are not utilized as new routes) than entirely new rights-of-way? Upgrading the lines along routes 5, 6, 7, and 8 from 69kV to 138kV will not have any new significant impact compared to establishing a new 100-foot wide right-of-way along 7 to 8 miles of rural highway as proposed in routes 1, 2, 3 and 4.

As shown in the memorandum, leg A-B of routes 1, 2, 3, and 4 crosses State Route 677 at or near US Route 50. Recent adjustments in that area move the route several hundred yards north of US Route 50. With these adjustments, routes 1, 2, 3, and 4 are not only near, but cut right through the middle of a "Known Threatened or Endangered Species Location". This endangered species location is indicated in the memorandum in figure 2C. This adjustment would affect the results shown in table 2A of the memorandum which scores 0 for all routes in the category of threatened and endangered species.

At the August 2011 public meeting, routes 1 and 2 of the memorandum were presented as the candidate routes. I was told at the meeting that my property would not be affected by either route. Since that time, surveyors have trespassed on my property, cut paths and trees, and set survey pins as part of the "adjustments" being made to routes 1 and 2. All of this has been done without any notification to me and absolutely without permission from me. I still have not been formally notified that my property will be affected by the chosen routes.

Given that the ecological, cultural, and land use impact is somehow more severe along existing rights-of-way, the fact that adjustments to the candidate routes nullify any quantitative study used to select those routes, and the consideration that landowners do not know whether they are affected by the candidate routes because they have not been notified and the routes continue to change, the waiver granted for the two selected routes should be reconsidered AFTER the routes have been established. The impact study detailed in the memorandum in support of the application for waiver was not valid when routes 1 and 2 were initially established, and it is certainly not valid now that routes 1 and 2 have

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.

Technician LD Date Processed 7-31-12

513-839-0759
aepelk@sameprecision.org

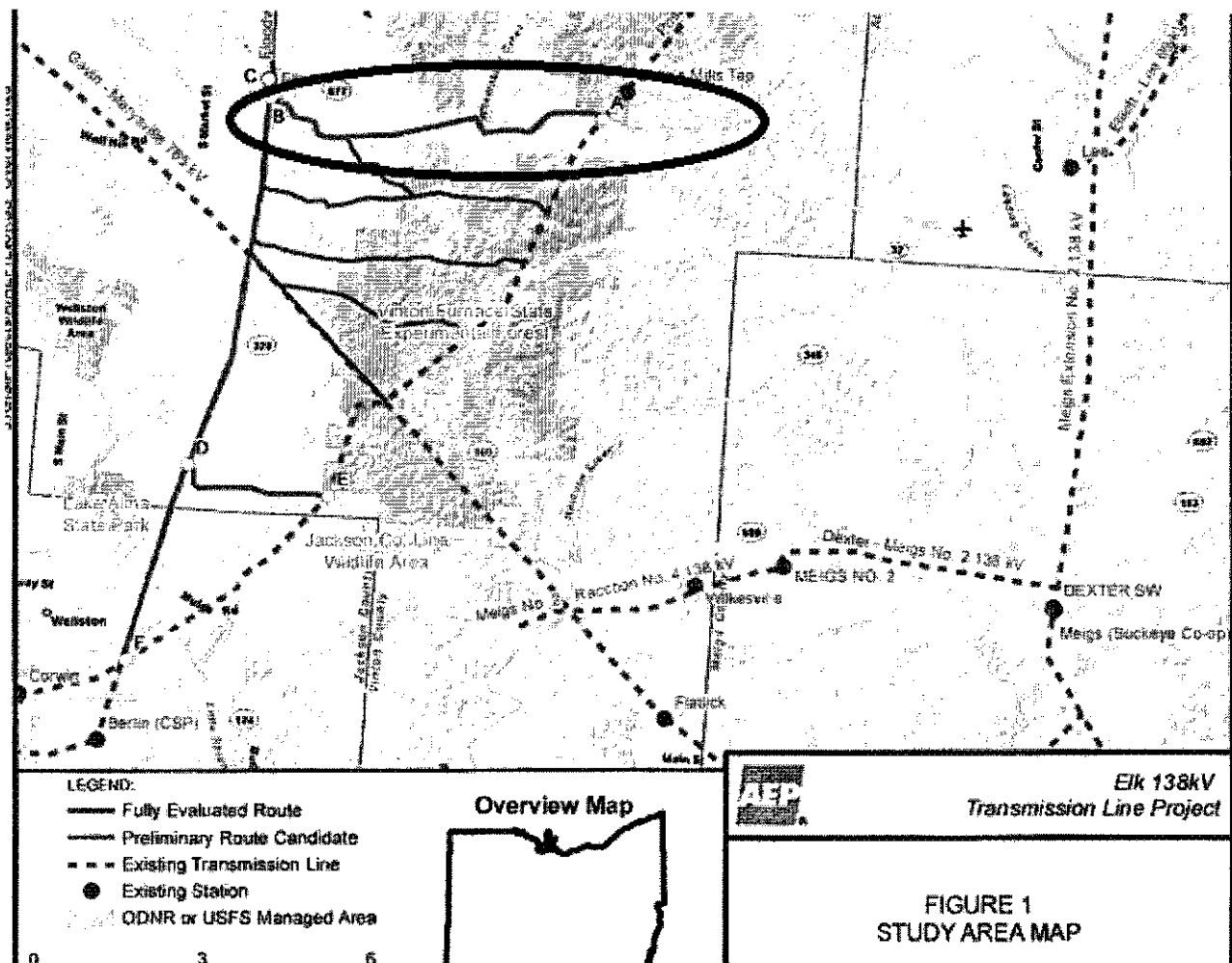


TABLE 2A
QUANTITATIVE ECOLOGICAL ROUTING COMPARISON

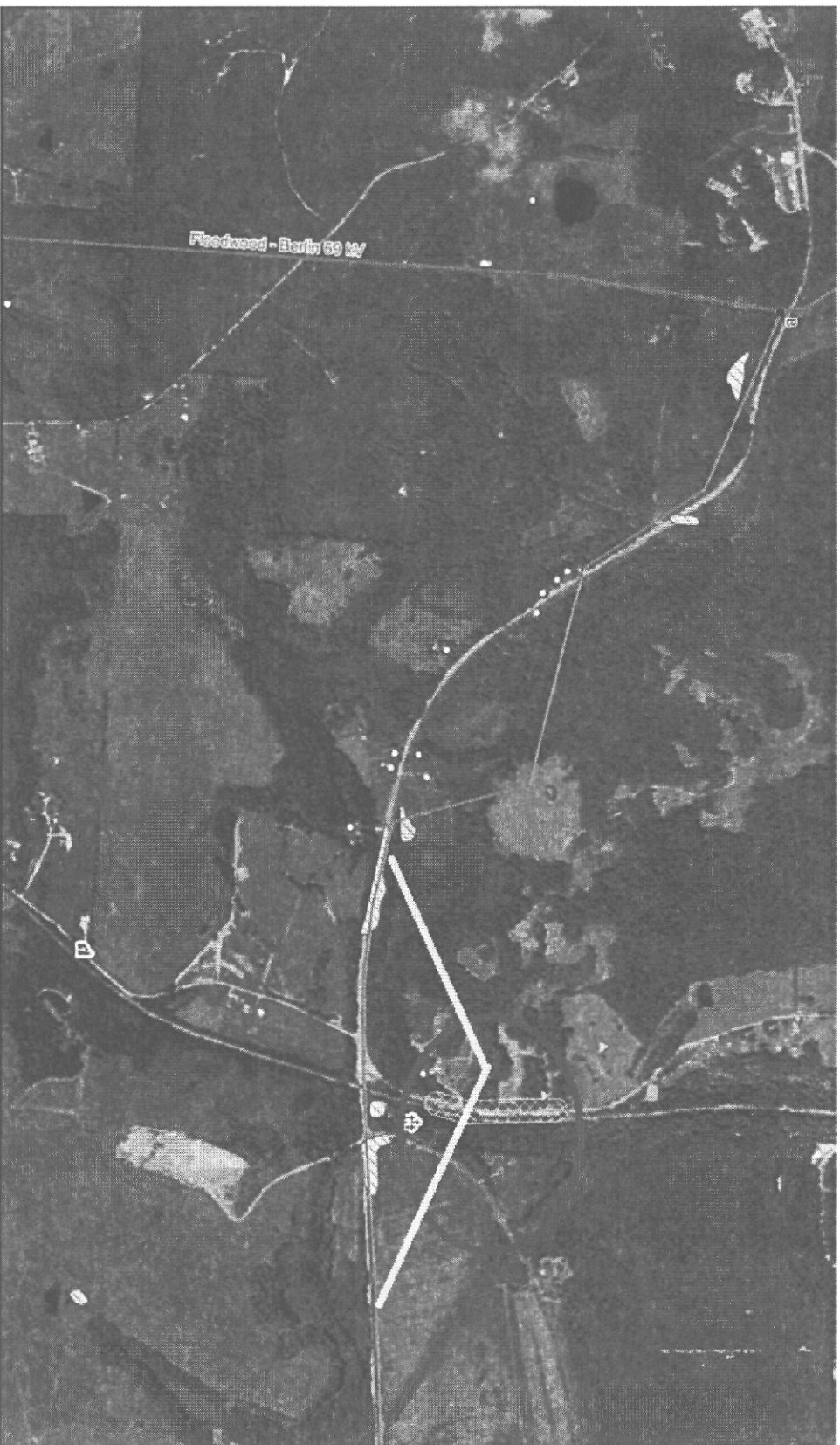
ROUTE			ECOLOGICAL							
			Woodlots		Wetlands		Streams		Threatened and Endangered Species	
Route	Route Length (ft)	Route Length (mi)	Area of Woodlots within 100-foot Right-of-way (acres)	Normalized Score for Area of Woodlots within 100-foot Right-of-way	National Wetland Inventory (NWI) Wetlands within 100-foot Right-of-way (acres)	Normalized Score for Area of NWI Wetlands within 100-foot Right-of-way	Number of Streams Crossings (c)	Normalized Score for Streams Crossings	Threatened and Endangered Species Listings within 100 feet (d)	Normalized Score for Threatened and Endangered Species Listings within 1,000 feet
(1) A-B-C-B-D-E	86,674	16.42	37	0	5	0	13	3	0	0
(2) A-B-C-B-D-F	90,975	17.23	38	4	5	2	16	13	0	0
(3) A-B-C-G-H-I	152,707	28.92	87	99	18	100	35	92	0	0
(4) A-B-C-G-I	150,777	28.56	88	100	15	79	37	100	0	0
(5) E-D-B-C-G-H-I	167,984	31.82	78	81	15	78	31	75	0	0
(6) E-D-B-C-G-I	166,054	31.45	79	82	12	57	33	83	0	0
(7) F-D-B-C-G-H-I	172,473	32.67	85	95	15	82	34	88	0	0
(8) F-D-B-C-G-I	170,543	32.30	86	96	12	60	36	96	0	0
Minimum	86,674	16.42	37		5		13		0	
Maximum	172,473	32.67	88		15		37		0	
Range	85,799	16.25	51		13		24		0	

(a) source: Woodlots as digitized from aerial photography

(b) source: NWI wetland areas as identified by United States Fish and Wildlife Service (USFWS)

(c) source: USGS Topographic Maps

(d) source: ODSR Biodiversity Database



LEGEND:

- Route Node
- Candidate Route
- - - Existing Transmission Line
- Existing Station
- Residence
- ⌂ School
- ⛪ Church
- ▨ ODNR Managed Area
- ▨ Wayne National Forest Boundary
- Ⓢ National Register of Historic Places Structure
- △ Known Archaeological Site
- Ohio Historic Inventory Structure
- †† Cemetery
- ▨ Known Threatened or Endangered Species Location
- ▨ NM Area



BASE MAP SOURCE
Ohio Statewide Imagery Program, 2007
Vinton County, Jackson County

**Elk 138kV
Transmission Line Project**

**FIGURE 2C
CONSTRAINT MAP**

CREATED BY: AG	DATE: 06/24/11
CHECKED BY: JN	SCALE: 1" = 1,000'
JOB NO. 1494984	URS

From: s
To: ContactThePUCO
Subject: Case SMCC073012GL
Received: 7/30/2012 1:27:40 PM
Message:

The attached comments in reference to case 11-4505-EL-BTX were originally submitted on 7/12/2012 via email to webmaster@puc.state.oh.us (the confirmation received is below). I am re-submitting these comments as I did not receive any response/confirmation.

----- Original Message -----

Subject:RE: Comments for Case 11-4505-EL-BTX

Date:Thu, 12 Jul 2012 20:56:46 +0000

From:webmaster <webmaster@puc.state.oh.us>

To:sam mccoy <aepelk@sameprecision.org>

CC:webmaster <webmaster@puc.state.oh.us>, ContactThePUCO <ContactThePUCO@puc.state.oh.us>

Thank you for contacting the PUCO. I am forwarding your comments to the PUCO Consumer Call Center. Call Center Staff will be able to assi
The Consumer Call Center is available 8 a.m. to 5:00 p.m., Monday through Friday. Please contact your local emergency agencies or your local

Consumer Call Center
(800) 686-PUCO (7826)
(800) 686-1570 (TTY-TDD)
Fax (614) 752-8351

Mailing Address
180 East Broad Street
Columbus, Ohio 43215

Sincerely,
Jeff McNaughton
Public Utilities Commission of Ohio
Business Resources
Webmaster
(614) 466-8070
PUCO.ohio.gov

-

-----Original Message-----

From: sam mccoy [<mailto:aepelk@sameprecision.org>]

Sent: Thursday, July 12, 2012 4:43 PM

To: webmaster

Subject: Comments for Case 11-4505-EL-BTX

Please forward this message to the appropriate recipient.
Thank you,
Sam McCoy