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A NiSource Company

December 24, 2024

Ms. Tanowa Troupe
Secretary, Office of Administration
Ohio Power Siting Board
180 East Broad Street
Columbus, Ohio 43215

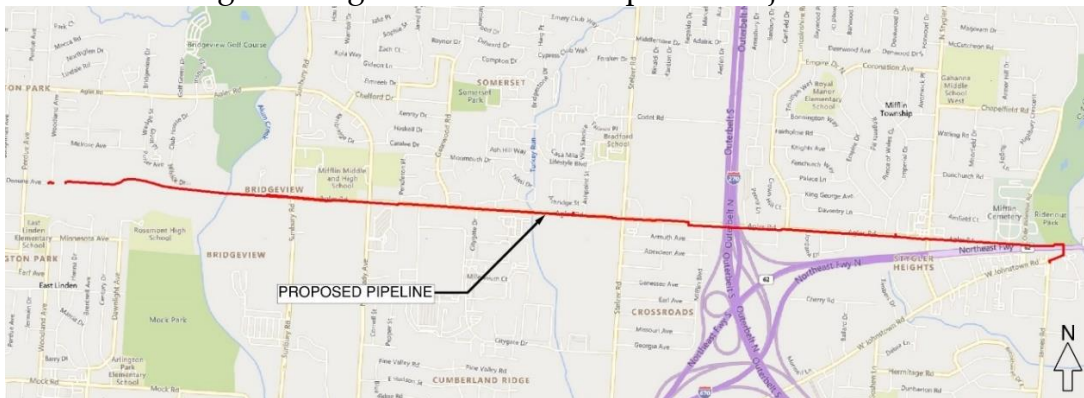
RE: *In the Matter of the Letter of Notification Application of Columbia Gas of Ohio, Inc. for a Certificate of Environmental Compatibility and Public Need for the Agler Road NCHP Pipeline Project*
OPSB Case No. 24-1126-GA-BLN

Dear Ms. Troupe:

Columbia Gas of Ohio, Inc. (“Columbia”) submits this Letter of Notification, pursuant to R.C. 4906.03(F)(3) and Adm.Code 4906-6, concerning a proposed pipeline project known as the Agler Road NCHP Pipeline Project (the “Project”).

Pursuant to Ohio Adm.Code 4906-6-03(B), Columbia respectfully requests expedited approval of this Letter of Notification. Further, in accordance with Ohio Adm.Code 4906-6-04(A)(1) and (2), Columbia has hand delivered a copy of this filing to the offices of the Ohio Power Siting Board along with the required two thousand-dollar payment. Specifically, Columbia requests approval of this Letter of Notification on or before March 14, 2025 in order to complete any tree clearing, if needed, during permitted seasonal tree cutting timeframes.

Figure 1: Agler Road NCHP Pipeline Project Route



As required by Adm.Code 4906-6-05, please be advised of the following:

(B) General Information

(1) The name of the project and applicant's reference number, names and reference number(s) of resulting circuits, a brief description of the project, and why the project meets the requirements for a letter of notification.

Columbia is proposing to construct the Project in Columbus, Ohio and Gahanna, Ohio. The proposed Project will be approximately 19,914 feet (3.8 miles) in length and consist of 24-inch diameter high pressure gas transmission class pipeline.

Much of the 24-inch natural gas main will be constructed within the public road right-of-way within the Cities of Columbus and Gahanna as well as within permanent private pipeline easements from six property owners as listed in Attachment D. Columbia plans to utilize a combination of conventional boring, horizontal directional drilling, and the open cut installation method to construct the Project. If any new information is discovered, and/or for public convenience or safety during construction, Columbia may utilize these methods interchangeably during construction of the Project.

This Project meets the requirements of the Letter of Notification as it is a replacement of gas pipelines or pipeline segments greater than one mile in length but not greater than five miles in length. See Appendix B of Adm.Code 4906-1-01.

(2) If the proposed letter of notification project is a gas pipeline, a statement explaining the need for the proposed facility.

PHMSA has begun implementing a comprehensive, three-part rule, aimed at increasing pipeline safety. These regulations are commonly known as the PHMSA Mega Rule and the entirety of the 24" mainline is being installed to comply with the PHMSA Mega Rule.

Mega Rule Part 1, which went into effect in 2020, involves new regulations for reconfirming the maximum allowable operating pressure ("MAOP") of pipelines and facilities installed before July 1, 2020, that are in certain class locations or high consequence areas ("HCAs"), and do not have available certain traceable, verifiable, and complete ("TVC") records, such as material

attributes and sufficient pressure test records. Operators have until 2035 to comply with these requirements, but 50% of the work in scope must be completed by July 2028. The Project is part of Columbia's plan to comply with the PHMSA Mega Rule.¹

Moreover, replacing the existing pipeline increases the reliability of a critical piece of Columbia's service to the Columbus area through the NCHP system, as well as provides safety benefits. The safety benefits include, but are not limited to, a lower ratio of operating stress to yield strength of the pipeline material and updated pipeline records.

(3) 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 map shown in Attachment A, Drawing Number AG-01: Overview Workspace illustrates the location of the Project in relation to existing transmission facilities in the Project area. The new pipeline is shown in red and the workspace for constructing the new pipeline is a black-dashed line. The existing NCHP pipeline that will be replaced is the blue line.

(4) The alternatives considered and reasons why the proposed location or route is best suited for the proposed facility, including, but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.

The proposed route was developed taking into consideration the current pipeline route, private property, the density of below-grade utilities, impact to the public, and environmental features. The proposed route minimizes the number of residential homes and businesses directly affected by the Project. Installation methods have been selected to further limit impact to high traffic roads, other infrastructure such as railroads, environmental features, and trees. Tree clearing and trimming will occur along the pipeline route as needed for safe construction and pipeline operation purposes along the public right-of-way as well as for permanent and temporary easement areas. Columbia currently plans to HDD under Alum Creek in Columbus to avoid the

¹ See *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of an Alternative Rate Plan*, Case Nos. 23-0046-GA-ALT, *et al.*, Staff Report at 10 (July 7, 2023).

environmental impacts of alternative crossings, and the HDD will continue east of Sunbury Road in order to minimize impacts to the mature trees along that portion of the Project. A second HDD is planned for the Interstate 270 (I-270) crossing at the Columbus and Gahanna city line. This trenchless installation is being pursued to avoid the traffic impacts to this vital thoroughfare. The HDD profiles are shown within Attachment B. The route has 499 structures within 1,000 feet of the centerline, five of which are schools or daycares, and one is a place of worship. Please see Attachment G for the Cultural Memorandum for the details of the cultural study.

(5) Describe the public information program to inform affected property owners and residents of the nature of the project and the proposed timeframe for project construction and restoration activities.

Columbia will provide the notices required by the OPSB rules, including notices to landowners, newspaper notice, a copy of this Letter of Notification (with attachments) posted in libraries, and notices to public officials. Columbia will also be hosting a website dedicated to this phase of its Mega Rule compliance. That website is www.columbiagasohio.com/agler-road-nchp. Columbia will have a dedicated e-mail address to receive inquiries from any interested stakeholder and will be responding to those inquiries.

(6) The anticipated construction schedule and proposed in-service date of project.

At the present time, Columbia anticipates installation of the proposed pipeline to begin around April 2025 and to complete this work by December 31, 2025 with initial tree clearing commencing (as needed) in March. This timeframe and scope of work is subject to change based on evolving project planning and other variables, and Columbia will work with Columbus, Gahanna, Franklin County, and affected residents throughout the construction process.

(7) An area map of not less than 1:24,000 scale clearly depicting the facility and proposed limits of disturbance with clearly marked streets, roads, and highways, and an aerial image.

Attachment B is comprised of the pipeline alignment drawings and the pipeline workspace drawings that contain area maps at a 1"= 40' scale. The

maps and drawings depict the Project centerline, workspaces, and major street crossings. The Project centerline is shown as a dashed red line, and workspaces are shown as cyan-hatched areas bounded by dashed black lines for workspace within public right-of-way; grey-hatched areas bounded by dashed blue lines for permanent easement within private parcels; and pink-hatched areas bounded by dashed black lines for temporary easement within private parcels. Roads, streets, highways, and other crossings are clearly labeled throughout.

Attachment H contains the Management of Traffic (MOT) plans for the construction of the pipeline.

(8) 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.

A list of all adjacent and impacted parcels and entities are listed in Attachment D.

As of the date of this filing, all necessary easements have been secured. Columbia may procure additional temporary easements for the purposes of temporary access and/or workspace as needed.

(9) Technical features of the project.

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

The Project will be tested such that it will have an MAOP of 720 pounds per square inch gauge (“psig”). Columbia will be installing 24-inch main-line piping that is coated steel with a wall thickness of 0.375 inches.

The location of the workspaces, easements, and right-of-way are shown in the drawings included in Attachment B.

(b) For electric power transmission lines that are within 100 feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line, describe:

(i) Calculated electric and magnetic field strength levels at one meter above ground under the lowest conductors and at the edge of the right-of-way for: (a) Normal maximum loading, (b) Emergency line loading, (c) Winter normal conductor rating.

(ii) 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.

Not applicable to this Project as it does not relate to an electric power transmission line.

(c) The estimated capital cost of the project.

The estimated total cost of the proposed Project is \$ [REDACTED].

(10) Social and Ecological Impacts of the Project.

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

The Project is located within the Cities of Columbus and Gahanna, Franklin County, Ohio. The current land use along the route is comprised of mostly residential and commercial properties and one city park. There is an approximately 0.82-mile-long section of the route traversing wooded land. There are also transportation-related land use areas including one Interstate and several road crossings as well as a water crossing (Alum Creek).

Currently, the route has 499 structures within 1,000 feet of the centerline. Five schools or daycares, and one place of worship were identified based on desktop analysis.

There are no new planned residential developments within the Project study corridor that were discovered as part of the survey. The Project is not expected to significantly impact existing or planned land use within the vicinity of the Project. There are no federal lands that will be crossed by the Project. A city owned park is located just east of Alum Creek and will be crossed via HDD.

The municipalities, townships, and counties affected include Franklin County, Mifflin Township, the City of Gahanna, and the City of Columbus.

(b) 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.

No agricultural land or agricultural district land parcels are impacted by the Project.

(c) 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.

Colliers Engineering & Design (CED) was contracted by NiSource Inc. (NiSource) to perform a cultural resource background review for the Agler Road NCHP Pipeline Project (Project) in Columbus, Franklin County, Ohio. This background review and desktop assessment has been prepared in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966. This regulation requires project proponents to consider a project's effects on historic properties depending on potential permitting requirements and/or funding sources. The purpose of the document is to outline any previously recorded cultural resources that may be impacted by the proposed Project in support of Columbia's compliance with Section 106 of the NHPA. The goal is also to provide information for project planning and development, as well as estimates on possible future work that may be required for regulatory compliance. A cultural resources survey was not conducted as an element of this research.

The Project area consists mostly of suburban neighborhoods with a few commercial buildings and a small, wooded area on the easternmost side. The Project area has been subject to heavy disturbance from residential and commercial construction activities for many years. The Project area is bordered on all sides by further residential and commercial development.

The following information was gathered as part of the desktop review to identify previously recorded cultural resources within a 0.5-mile (0.8-km) radius of the Project area. The background review consisted of a cultural resources and literature review of the Project area. A CED archaeologist reviewed the online database hosted by the Ohio History Connection (OHC), the State Historic Preservation Office (SHPO) of Ohio, for any previously recorded surveys, historic or prehistoric sites, and cemeteries located in or near the Project. Site files, relevant maps, and National Register of Historic Places (NRHP) locations were also examined. Aerial photographs, topographic maps, and the NRCS Web Soil Survey were also examined for historical and environmental information related to the Project area.

The background review revealed that two (2) previous archaeological surveys have been conducted in portions of the Project area. The first was a “Phase I Cultural Resource Management Investigation of the 2.725 Ha (6.734 A.) Proposed Construction Site for the Providence Glen Apartments and the Corban Commons Apartments in Mifflin Township, Franklin County, Ohio” conducted in 1998, and the second one was “Phase I Cultural Resources Management Investigation for the 25.6 Ha (63.3 A.) Proposed Construction of the United States Postal Service Facility in Mifflin Township, Franklin County, Ohio” conducted in 1999. Both surveys intersect the Project area at Agler Rd and Gatewood Rd. Several additional surveys have also been conducted within a 0.5-mile (0.80 km) radius of the Project area (OHC 2023).

Based on the desktop review, there are no archaeological sites or above-ground historic resources documented within the Project area; however, there are multiple cultural resources documented within a 0.5-mile (0.80 km) radius of the Project area.

Historical topographic maps and aerial photography revealed existing suburban housing near the Project area from at least 1954 to the present (USGS 1954, 1955, 1964, 1965a, 1965b, 1995a, 1995b, 2010a, 2010b; Nationwide Environmental Title Research [NETR] 2022a, b, c, and d). The vicinity has remained mainly developed land with large areas of gridded residential structures that gradually increased over time from the 1960s to the present (NETR 2022a-d).

Based on the information provided and the results of this desktop assessment, CED would recommend a cultural resources survey should the Project proceed. Previously documented resources in the immediate vicinity including

Mifflin Cemetery indicate a moderate to high probability for encountering archaeological sites within or adjacent to the Project area. This background review and assessment was conducted in support of Columbia compliance with Section 106 of the NHPA.

A copy of the Cultural Report is included in Attachment G. Columbia will provide the response from SHPO upon receipt.

(d) A list of the local, state, and federal government 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 copy of this Letter of Notification has been sent to the following public officials concurrently with its submittal to the Ohio Power Siting Board.

| Franklin County | |
|------------------------------|------------------------------|
| Kevin L. Boyce | Erica C. Crawley |
| Franklin County Commissioner | Franklin County Commissioner |
| President | 373 S. High Street |
| 373 S. High Street | Columbus, Ohio 43215 |
| Columbus, Ohio 43215 | 614-525-3600 |
| 614-525-3600 | |
| | |
| John O'Grady | Maryellen O'Shaughnessy |
| Franklin County Commissioner | Clerk of Courts |
| 373 S. High Street | 373 S. High Street |
| Columbus, Ohio 43215 | Columbus, Ohio 43215 |
| 614-525-3600 | 614-525-3600 |
| | |
| Brad Foster, P.E., P.S. | |
| Franklin County Engineer | |
| 970 Dublin Road | |
| Columbus, Ohio 43215 | |
| 614-525-3600 | |

| Mifflin Township | |
|---------------------------------|---------------------------------|
| Kevin Cavener | Richard Angelou |
| Mifflin Township Chair | Mifflin Township Vice-Chair |
| 400 W. Johnstown Rd., Suite 200 | 400 W. Johnstown Rd., Suite 200 |
| Gahanna, OH 43230 | Gahanna, OH 43230 |
| (614) 471-4494 | (614) 471-4494 |
| | |
| Jamie Leeseberg | Kelly Cararo |
| Mifflin Township Trustee | Mifflin Township Fiscal Officer |
| 400 W. Johnstown Rd., Suite 200 | 400 W. Johnstown Rd., Suite 200 |
| Gahanna, OH 43230 | Gahanna, OH 43230 |
| (614) 471-4494 | (614) 471-4494 |

| City of Gahanna | |
|---------------------------------|---|
| Laurie Jadwin | Merisa Bowers |
| City of Gahanna Mayor | Gahanna Council President Member at Large |
| 200 S Hamilton Rd | 200 S Hamilton Rd |
| Gahanna, OH 43230 | Gahanna, OH 43230 |
| 614-342-4045 | 614-342-4090 |
| | |
| Trenton Weaver | Michael Schnetzer |
| Gahanna Council Vice President | Gahanna Council Finance Chair |
| 200 S Hamilton Rd | 200 S Hamilton Rd |
| Gahanna, OH 43230 | Gahanna, OH 43230 |
| 614-342-4090 | 614-342-4090 |
| | |
| Jamille Jones | Nancy McGregor |
| Gahanna Council Member at Large | Gahanna Council Member at Large |
| 200 S Hamilton Rd | 200 S Hamilton Rd |
| Gahanna, OH 43230 | Gahanna, OH 43230 |
| 614-342-4090 | 614-342-4090 |
| | |
| Kaylee Padova | Stephen Renner |
| Gahanna Council Member | Gahanna Council Member |
| 200 S Hamilton Rd | 200 S Hamilton Rd |
| Gahanna, OH 43230 | Gahanna, OH 43230 |
| 614-342-4090 | 614-342-4090 |
| | |
| Jeremy VanMeter | Sophia McGuire |
| Gahanna Clerk of Council | City of Gahanna Deputy Clerk of Council |
| 200 S Hamilton Rd | 200 S Hamilton Rd |
| Gahanna, OH 43230 | Gahanna, OH 43230 |
| 614-342-4090 | 614-342-4090 |
| | |

| City of Columbus | |
|-------------------------------------|------------------------------------|
| Hon. Andrew Ginther | Shannon G. Hardin |
| City of Columbus Mayor | City of Columbus Council President |
| 90 W. Broad Street | 90 W. Broad Street |
| Columbus, Ohio 43215 | Columbus, Ohio 43215 |
| 614-645-7671 | 614-645-7671 |
| | |
| Rob Dorans | Nicholas J. Bankston |
| City of Columbus, Council President | Columbus City Council |
| Pro Tempore | 90 W. Broad Street |
| 90 W. Broad Street | Columbus, Ohio 43215 |
| Columbus, Ohio 43215 | 614-645-7671 |
| | |
| Lourdes Barroso de Padilla | Nancy Day-Achauer |
| Columbus City Council | Columbus City Council |
| 90 W. Broad Street | 90 W. Broad Street |
| Columbus, Ohio 43215 | Columbus, Ohio 43215 |
| 614-645-7671 | 614-645-7671 |
| | |
| Shayla Favor | Melissa Green |
| Columbus City Council | Columbus City Council |
| 90 W. Broad Street | 90 W. Broad Street |
| Columbus, Ohio 43215 | Columbus, Ohio 43215 |
| 614-645-7671 | 614-645-7671 |
| | |
| Emmanuel V. Remy | Christopher L. Wyche |
| Columbus City Council | Columbus City Council |
| 90 W. Broad Street | 90 W. Broad Street |
| Columbus, Ohio 43215 | Columbus, Ohio 43215 |
| 614-645-7671 | 614-645-7671 |
| | |
| Andrea Blevins | Toya Johnson |
| City of Columbus City Clerk | City of Columbus Deputy City Clerk |
| 90 W. Broad Street | 90 W. Broad Street |
| Columbus, Ohio 43215 | Columbus, Ohio 43215 |
| 614-645-7671 | 614-645-7671 |
| | |
| | |

In addition to submitting this Letter of Notification to the Ohio Power Siting Board, the Project is subject to the following federal, state, and local agency reviews and authorizations to be received prior to construction beginning:

- U.S. Army Corps of Engineers (USACE) Nationwide Permit 12 Evaluation;
- U.S. Fish & Wildlife Service (USFWS) Ohio Ecological Field Office Section 7 Threatened and Endangered Species Consultation;
- Ohio State Historic Preservation Office Section 106 Historic Resources Consultation;
- Ohio Department of Natural Resources (ODNR) State Threatened and Endangered Species Consultation;
- Ohio Environmental Protection Agency (OEPA) Section 402 National Pollutant Discharge Elimination System (NPDES) and Construction Stormwater Permit and Stormwater Pollution Prevention Plan (SWPPP) requirements;
- City of Columbus Department of Public Service ROW Excavation Permit;
- City of Gahanna ROW Permit;
- Franklin County Permit;
- Ohio EPA Hydrostatic Test Water Discharge Permit; and
- Ohio Department of Transportation Right-of-Way and Utility Permit.

(e) A description of the applicant’s investigation concerning the presence or absence of federal and state designated species (including endangered species, threatened species, rare species, species proposed for listing, species under review for listing, and species of special interest) 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.

A threatened and endangered species review was conducted to become aware of the potential presence of Endangered or Threatened listed species that are located within the Project Study Area or within the vicinity. The United States Fish and Wildlife Service (USFWS) web page was reviewed to determine species that have Federal protection in Franklin County, within the state of Ohio. A refined search, using the USFWS Information for Planning and Consultation (IPaC) database, was performed to provide a more detailed list of species and critical habitat under USFWS jurisdiction that are known or expected to occur within the Project Study Area. The table below provides the USFWS IPaC Species List for the Project Study Area.

| Table 1. USFWS Ipac Species List for Project Study Area | | |
|---|------------------------|----------------------|
| Common Name | Scientific Name | Status |
| Insects | | |
| Monarch Butterfly | Danaus plexippus | Candidate Species |
| Mammals | | |
| Indiana Bat | Myotis sodalis | Federally Endangered |
| Northern Long-eared Bat | Myotis septentrionalis | Federally Endangered |
| Tricolored Bat | Perimyotis subflavus | Proposed Endangered |
| Clams | | |
| Round Hickorynut | Obovaria subrotunda | Federally Threatened |

In addition to the review of federal databases, CED conducted a review of the Ohio Department of Natural Resources (ODNR) web page regarding natural heritage resources surrounding the Project Study Area. The ODNR provides results of potential occurrences of rare species, natural communities, and federally listed species that have been documented within the immediate vicinity of the Project Study Area. Table 2 lists species that, as of May 22, 2023, potentially occur in Franklin County.

| Table 2. ODNR Franklin County Species List as of May 22, 2023 | | | |
|---|----------------------------------|--------------------|----------------------|
| Common Name | Scientific Name | State Status | Federal Status |
| Mammals | | | |
| Indiana Myotis | <i>Myotis sodalis</i> | Endangered | Federally Endangered |
| Black Bear | <i>Ursus americanus</i> | Endangered | - |
| Northern Long- eared Bat | <i>Myotis septentrionalis</i> | Threatened | Federally Threatened |
| Star-nosed Mole | <i>Condylura cristata</i> | Species of Concern | - |
| Big Brown Bat | <i>Eptesicus fuscus</i> | Species of Concern | - |
| Red Bat | <i>Lasiurus borealis</i> | Species of Concern | - |
| Hoary Bat | <i>Lasiurus cinereus</i> | Species of Concern | - |
| Snowshoe Hare | <i>Lepus americanus</i> | Species of Concern | - |
| Woodland Vole | <i>Microtus pinetorum</i> | Species of Concern | - |
| Ermine | <i>Mustela erminea</i> | Species of Concern | - |
| Little Brown Bat | <i>Myotis lucifugus</i> | Species of Concern | - |
| Tri-colored Bat | <i>Perimyotis subflavus</i> | Species of Concern | - |
| Deer Mouse | <i>Peromyscus maniculatus</i> | Species of Concern | - |
| Smoky Shrew | <i>Sorex fumeus</i> | Species of Concern | - |
| Southern Bog Lemming | <i>Synaptomys cooperi</i> | Species of Concern | - |
| Badger | <i>Taxidea taxus</i> | Species of Concern | - |
| Common Gray Fox | <i>Urocyon cinereoargenteus</i> | Species of Concern | - |
| Evening Bat | <i>Nycticeius humeralis</i> | Special Interest | - |
| American Bison | <i>Bison bison</i> | Extirpated | - |
| Birds | | | |
| Upland Sandpiper | <i>Bartramia longicauda</i> | Endangered | - |
| American Bittern | <i>Botaurus lentiginosus</i> | Endangered | - |
| Cattle Egret | <i>Bubulucus ibis</i> | Endangered | - |
| Lark Sparrow | <i>Chondestes grammacus</i> | Endangered | - |
| Northern Harrier | <i>Circus hudsonius</i> | Endangered | - |
| Sandhill Crane | <i>Grus canadensis</i> | Threatened | - |
| Least Bittern | <i>Ixobrychus exilis</i> | Threatened | - |
| Black-crowned Night-Heron | <i>Nycticorax nycticorax</i> | Threatened | - |
| Barn Owl | <i>Tyto alba</i> | Threatened | - |
| Sharp-sinned Hawk | <i>Accipiter striatus</i> | Species of Concern | - |
| Henslow's Sparrow | <i>Ammodramus henslowii</i> | Species of Concern | - |
| Grasshopper Sparrow | <i>Ammodramus savannarum</i> | Species of Concern | - |
| Great Egret | <i>Ardea alba</i> | Species of Concern | - |
| Common Nighthawk | <i>Chordeiles minor</i> | Species of Concern | - |
| Sedge Wren | <i>Cistothorus platensis</i> | Species of Concern | - |
| Black-billed Cuckoo | <i>Coccyzus erythrophthalmus</i> | Species of Concern | - |
| Northern Bobwhite | <i>Colinus virginianus</i> | Species of Concern | - |

Table 2 Continued. ODNR Franklin County Species List as of May 22, 2023

| Common Name | Scientific Name | State Status | Federal Status |
|----------------------------|-----------------------------------|--------------------|----------------|
| Birds Continued | | | |
| Bobolink | <i>Dolichonyx oryzivorus</i> | Species of Concern | - |
| American Coot | <i>Fulica americana</i> | Species of Concern | - |
| Common Gallinule | <i>Gallinula galeata</i> | Species of Concern | - |
| Red-headed Woodpecker | <i>Melanerpes erythrocephalus</i> | Species of Concern | - |
| Vesper Sparrow | <i>Poocetes gramineus</i> | Species of Concern | - |
| Sora Rail | <i>Porzana carolina</i> | Species of Concern | - |
| Prothonotary Warbler | <i>Protonotaria citrea</i> | Species of Concern | - |
| Virginia Rail | <i>Rallus limicola</i> | Species of Concern | - |
| Cerulean Warbler | <i>Setophaga cerulea</i> | Species of Concern | - |
| Northern Shoveler | <i>Anas clypeata</i> | Special Interest | - |
| Green-Winged Teal | <i>Anas crecca</i> | Special Interest | - |
| American Black Duck | <i>Anas rubripes</i> | Special Interest | - |
| Veery | <i>Catharus fuscescens</i> | Special Interest | - |
| Hermit Thrush | <i>Catharus guttatus</i> | Special Interest | - |
| Brown Creeper | <i>Certhia americana</i> | Special Interest | - |
| Least Flycatcher | <i>Empidonax minimus</i> | Special Interest | - |
| Wilson's Snipe | <i>Gallinago delicata</i> | Special Interest | - |
| Dark-eyed Junco | <i>Junco hyemalis</i> | Special Interest | - |
| Yellow-crowned Night-Heron | <i>Nyctanassa violacea</i> | Special Interest | - |
| Nashville Warbler | <i>Oreothlypis ruficapilla</i> | Special Interest | - |
| Northern Waterthrush | <i>Parkesia noveboracensis</i> | Special Interest | - |
| Golden-crowned Kinglet | <i>Regulus satrapa</i> | Special Interest | - |
| Blackburnian Warbler | <i>Setophaga fusca</i> | Special Interest | - |
| Magnolia Warbler | <i>Setophaga magnolia</i> | Special Interest | - |
| Red-breasted Nuthatch | <i>Sitta canadensis</i> | Special Interest | - |
| Yellow-bellied Sapsucker | <i>Sphyrapicus varius</i> | Special Interest | - |
| Winter Wren | <i>Troglodytes hiemalis</i> | Special Interest | - |
| Golden-winged Warbler | <i>Vermivora chrysoptera</i> | Special Interest | - |
| Bell's Vireo | <i>Vireo bellii</i> | Special Interest | - |
| Insects | | | |
| - | <i>Chimarra socia</i> | Endangered | - |
| Two-spotted Skipper | <i>Euphyes bimacula</i> | Species of Concern | - |
| - | <i>Agroperina lutosa</i> | Species of Concern | - |
| Precious Underwing | <i>Catocala pretiosa</i> | Species of Concern | - |
| Slender Clearwing | <i>Hemaris gracilis</i> | Special Interest | - |

Table 2 Continued. ODNr Franklin County Species List as of May 22, 2023

| Common Name | Scientific Name | State Status | Federal Status |
|------------------------|------------------------------------|--------------------|----------------------|
| Fish | | | |
| Iowa Darter | <i>Etheostoma exile</i> | Endangered | - |
| Spotted Darter | <i>Etheostoma maculatum</i> | Endangered | - |
| Tonguetied Minnow | <i>Exoglossum laurae</i> | Endangered | - |
| Goldeye | <i>Hiodon alosoides</i> | Endangered | - |
| Northern Brook Lamprey | <i>Ichthyomyzon fossor</i> | Endangered | - |
| Shortnose Gar | <i>Lepisosteus platostomus</i> | Endangered | - |
| Popeye Shiner | <i>Notropis ariommus</i> | Endangered | - |
| Lake Chubsucker | <i>Erimyzon sucetta</i> | Threatened | - |
| Tippecanoe Darter | <i>Etheostoma tippecanoe</i> | Threatened | - |
| Paddlefish | <i>Polyodon spathula</i> | Threatened | - |
| Muskellunge | <i>Esox masquinongy</i> | Species of Concern | - |
| Blue catfish | <i>Ictalurus furcatus</i> | Species of Concern | - |
| Blacknose Shiner | <i>Notropis heterolepis</i> | Extirpated | - |
| Longhead Darter | <i>Percina macrocephata</i> | Extirpated | - |
| Clams/Mollusk | | | |
| Butterfly | <i>Ellipsaria lineolata</i> | Endangered | - |
| Elephant-ear | <i>Elliptio crassidens</i> | Endangered | - |
| Purple Cats paw | <i>Epioblasma obliquata</i> | Endangered | Federally Endangered |
| Snuffbox | <i>Epioblasma triquetra</i> | Endangered | Federally Endangered |
| Longsolid | <i>Fusconaia subrotunda</i> | Endangered | - |
| Pink Mucket | <i>Lampsilis abrupta</i> | Endangered | Federally Endangered |
| Pocketbook | <i>Lampsilis ovata</i> | Endangered | - |
| Washboard | <i>Megaloniaias nervosa</i> | Endangered | - |
| Clubshell | <i>Pleurobema clava</i> | Endangered | Federally Endangered |
| Ohio Pigtoe | <i>Pleurobema cordatum</i> | Endangered | - |
| Rabbitsfoot | <i>Theliderma cylindrica</i> | Endangered | Federally Threatened |
| Rayed Bean | <i>Villosa fabalis</i> | Endangered | Federally Endangered |
| Black Sandshell | <i>Ligumia recta</i> | Threatened | - |
| Threehorn Wartyback | <i>Obliquaria reflexa</i> | Threatened | - |
| Fawnsfoot | <i>Truncilla donaciformis</i> | Threatened | - |
| Pondhorn | <i>Unio merus tetralasmus</i> | Threatened | - |
| Elktoe | <i>Alasmidonta marginata</i> | Species of Concern | - |
| Purple Wartyback | <i>Cycloniaias tuberculata</i> | Species of Concern | - |
| Wavy-rayed Lampmussel | <i>Lampsilis fasciola</i> | Species of Concern | - |
| Creek Heelsplitter | <i>Lasmigona compressa</i> | Species of Concern | - |
| Round Pigtoe | <i>Pleurobema sintoxia</i> | Species of Concern | - |
| Kidneyshell | <i>Ptychobranchnus fasciolaris</i> | Species of Concern | - |

| Table 2 Continued. ODNR Franklin County Species List as of May 22, 2023 | | | |
|---|--|---------------------|----------------|
| Common Name | Scientific Name | State Status | Federal Status |
| Clams/Mollusk Continued | | | |
| Deertoe | <i>Truncilla truncata</i> | Species of Concern | - |
| Mucket | <i>Actinonaias ligamentina ligamentina</i> | Extirpated | - |
| Rough Pigtoe | <i>Pleurobema plenum</i> | Extirpated | - |
| Reptiles/Amphibians | | | |
| Smooth Greensnake | <i>Opheodrys vernalis</i> | Endangered | - |
| Eastern Cricket Frog | <i>Acris crepitans crepitans</i> | Species of Concern | - |
| Four-toed Salamander | <i>Hemidactylium scutatum</i> | Species of Concern | - |
| Flowering Plants | | | |
| American Sweet-flag | <i>Acorus americanus</i> | Proposed Threatened | - |
| Gattinger's-foxglove | <i>Agalinis gattingeri</i> | Threatened | - |
| Spreading Rock Cress | <i>Arabis patens</i> | Endangered | - |
| Prairie False Indigo | <i>Baptisia lacteal</i> | Proposed Threatened | - |
| Prairie Brome | <i>Bromus kalmii</i> | Proposed Threatened | - |
| Pale Umbrella- sedge | <i>Carex acuminatus</i> | Endangered | - |
| Cypress-knee Sedge | <i>Carex decomposita</i> | Proposed Threatened | - |
| Tall Larkspur | <i>Delphinium exaltatum</i> | Proposed Threatened | - |
| One-sided Rush | <i>Juncus secundus</i> | Proposed Threatened | - |
| Scaly Blazing-star | <i>Liatrix squarrosa</i> | Proposed Threatened | - |
| Weak Spear Grass | <i>Poa saltuensis ssp. Languida</i> | Proposed Threatened | - |
| Abor Vitae | <i>Thuja occidentalis</i> | Proposed Threatened | - |
| Three-birds Orchid | <i>Triphora trianthophora</i> | Proposed Threatened | - |
| Rock Elm | <i>Ulmus thomasii</i> | Proposed Threatened | - |

A project review request letter was submitted to ODNR on May 26, 2023, seeking review of the potential impacts of the Project on federal and state listed species and their habitats within the Project area. A response was provided by ODNR on June 28, 2023, which identifies nine State-listed species that occur within one mile of the Project limits: Lark sparrow (*Chondestes grammacus*, Endangered), Yellow-crowned night-heron (*Nyctanassa violacea*, Special Interest), Purple wartyback (*Cyclonaias tuberculata*, Species of Concern), Elktoe (*Alasmidonta marginata*, Species of Concern), Wavy-rayed lampmussel (*Lampsilis fasciola*, Species of Concern), Black sandshell (*Ligumia recta*, Species of Concern), Round pigtoe (*Pleurobema sintoxia*, Species of Concern), Kidneyshell (*Ptychobranchnus fasciolaris*, Species of Concern), and Rayed bean (*Villosa fabalis*, Endangered, Federally Endangered).

These species are not specifically recorded within the Project area itself. Due to the ongoing nature of the Project, an updated list was requested on May 24, 2024 and a response was received on June 26, 2024. No additional species were identified in the updated list provided by the ODNR.

Based on a review of the Northeast Columbus and New Albany Ohio Quadrangle USGS Map and historical aerial photographs, the Project Study Area appears to be mainly residential/commercial properties and forested areas comprise about 22%. The Project Study Area is relatively flat with elevations that range from 750 to 950 feet above mean sea level (MSL). The Project Study Area is located in the Eastern Corn Belt Plains ecoregion.

The habitat within the Project corridor is urban and primarily consists of residential and commercial areas with maintained lawn. Approximately 22% of forested habitat are also present within the Project area. During the wetland delineation study, an on-site habitat assessment was performed to identify potential habitat for federally and state protected species within the Project area. Common tree species observed within the Project area during the study include sweetgum (*Liquidambar styraciflua*), loblolly pine (*Pinus taeda*), red maple (*Acer rubrum*), and American beech (*Fagus grandifolia*). Please see the pipeline alignment and workspace drawings in Attachment B for impacted locations of forested habitat.

In addition, Columbia will adhere to seasonal tree clearing timeframes recommended by both USFWS and ODNR as the Project will result in brush

and tree clearing/trimming in the immediate habitat surrounding the Project area. By adhering to the timeframe referenced (tree cutting completed by 3/31/25), habitat removal is unlikely to result in significant impacts to bat species. Based on this information and the minimization and avoidance measures planned to be implemented by Columbia, it is not likely that direct impacts to the Indiana bat or northern long-eared bat will occur.

The Project was also assessed for the presence of habitats that could potentially support other listed species. No suitable habitat for the listed species was identified within the Project area. In addition, two streams and one wetland feature have been delineated within the Project area that will be crossed by the proposed pipeline.

Section 7(a)(2) of the Endangered Species Act (ESA) directs all Federal agencies to ensure that any action they authorize, fund, or carry-out does not jeopardize the continued existence of an endangered or threatened species or designated or proposed critical habitat (collectively, referred to as protected resources). The crossing of jurisdictional streams by the proposed pipeline will be subject to a USACE Nationwide Permit 12 (reporting or non-reporting). This action creates a federal nexus for this Project; therefore, no tree clearing will occur on any portion of the Project area until consultation under Section 7 of the ESA is completed.

(f) 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.

An environmental review of the Project area was conducted on behalf of Columbia by its contractor, Campos EPC, LLC. According to the USFWS, there are no federal wilderness areas, wildlife refuges, or designated critical habitat within the vicinity of the Project area. Streams identified in the Project area are not part of a National or State wild and scenic river. For the full Wetland Delineation Report, please see Attachment C, and see the Inadvertent Release Plans for the horizontal directional drills (HDDs) in Attachment F. An excerpt of Attachment C is below:

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) were reviewed to identify any flood hazard areas that have been mapped for the proposed pipeline route. The Survey Corridor does contain a floodway and a floodplain according to FEMA Floodplain Panel Maps 39049C0189K, 39049C0193K, 39049C0194K, 39049C0213K, and 39049C0214K.

A copy of the aerial map with FEMA floodplain and floodway information for the Project area is included as Figure 4 in the Wetland Delineation Report located in Attachment C.

The Project Study Area is comprised of a 100-foot-wide survey corridor centered on the proposed pipeline alignment for 3.8 miles. The Project Study Area or “Survey Corridor” includes the proposed installation of 3.8 miles of 24-inch pipeline and additional workspaces. The additional workspaces are located along the alignment in the central and eastern end of the alignment. The Survey Corridor was investigated to identify potential jurisdictional Waters of the U.S. (WOTUS) and wetlands subject to Federal or State regulatory jurisdiction. The delineation methodologies developed by the USACE and the USEPA, as described in the 1987 Corps of Engineers Wetlands Delineation Manual, Technical Report Y-87-1 and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region (Version 2.0) and the subsequently issued USACE regulatory guidance regarding the identification of jurisdictional stream channels through the recognition of field indicators of an ordinary high-water mark within drainage features (Environmental Laboratory, 1987; USACE 2012; USACE 2005) were utilized during our investigation. The location and size of jurisdictional areas delineated are shown in Figure 5, Delineation Results, in the Wetland Delineation Report located in Attachment C.

Six (6) wetland features, three (3) palustrine unconsolidated bottom (pond) features, and seventeen (17) stream features were delineated within the Survey Corridor by CED on March 2nd and 3rd, 2022 and October 24, 2022. A total of 2.02 acres of palustrine forested (PFO) wetland, 0.46 acres of palustrine emergent (PEM) wetland, 0.39 acres of pond (palustrine unconsolidated bottom – PUB), 2,131 linear feet of perennial (R3) stream, and 1,525 linear feet of intermittent (R4) stream were delineated. Field investigations were conducted in accordance with the manuals, methodologies, and regulatory guidance procedures as stated in Section 5.0 Wetland and Surface Water Delineation Methodology.

It is CED's professional opinion that Wetland Features "1" through "3" and "5" through "7" and Stream Features "002" through "10" and "13" through "20" are considered jurisdictional WOTUS since they are and/or drain into Walnut Creek Rocky Fork Creek, Alum Creek. These stream and wetland features can be considered jurisdictional WOTUS since they connect to Walnut Creek, Rocky Fork Creek, and Alum Creek which eventually drains to the Scioto River. The location and size of jurisdictional areas delineated are shown on Figure 5. Delineation Results

Impacts to vegetation along the proposed pipeline route will be minimal. Tree clearing and trimming will occur along the pipeline route as needed for safe construction and pipeline operation purposes along the public right-of-way as well as for permanent and temporary easement areas. Representative plant species within the wetland areas include the following: green ash (*Fraxinus pennsylvanica*), red maple (*Acer rubrum*), sycamore (*Platanus occidentalis*), sugar maple (*Acer saccharum*), amur honeysuckle (*Lonicera mackaii*), multiflora rose (*Rosa multiflora*), and common rush (*Juncus effusus*).

Representative plant species within the upland areas include the following: sweetgum (*Liquidambar styraciflua*), loblolly pine (*Pinus taeda*), red maple, American beech (*Fagus grandifolia*), Christmas fern (*Polystichum acrostichoides*), common greenbrier (*Smilax rotundifolia*).

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

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

Should staff of the Ohio Power Siting Board desire further information or discussion of this application, please do not hesitate to reach out to me at the information listed above.

Respectfully submitted,

/s/ John Ryan

Attachment A

Project Map

Attachment B

Alignment and Workspace Drawings

Attachment C

Wetland Delineation Report

Attachment D

Right-of-Way Contact List/Affected Property Owners

Attachment E

Threatened and Endangered Species Memorandum

Attachment F

Inadvertent Release Plans

Attachment G

Cultural Memorandum

