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September 29, 2023

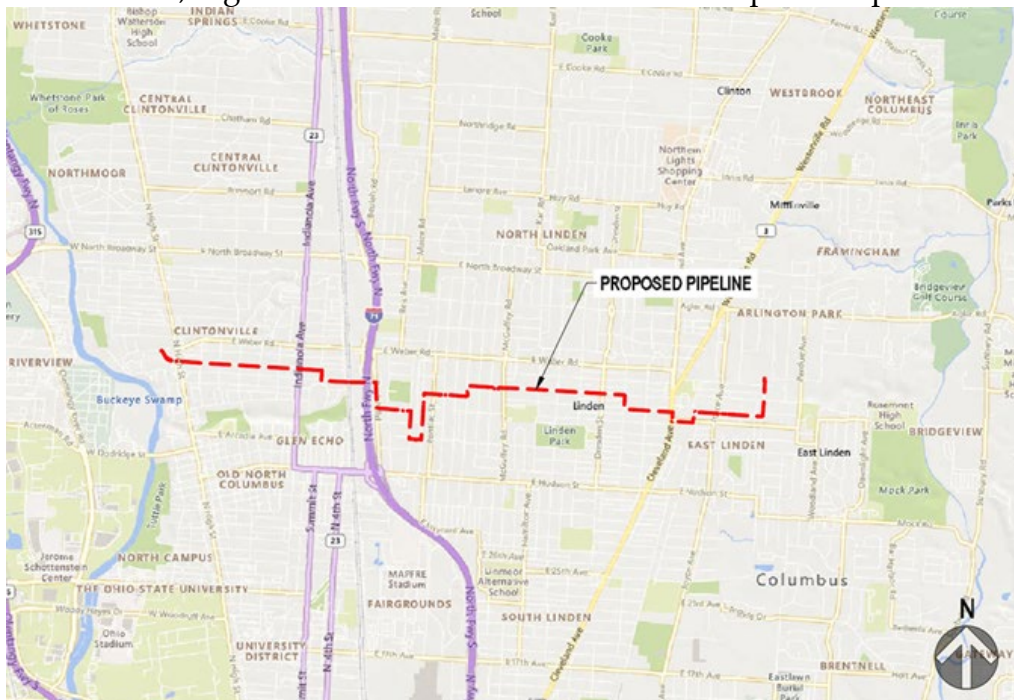
Ms. Tanowa Troupe  
Secretary, Office of Administration  
Ohio Power Siting Board  
180 East Broad Street  
Columbus, Ohio 43215

**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 Central Columbus North Columbus High Pressure (NCHP) System Project OPSB Case No. 23-0888-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 Ohio Adm.Code 4906-6, concerning a proposed pipeline project known as the Central Columbus North Columbus High Pressure (“NCHP”) System Project (the “Project”).

Attachment A, Figure 1: Central Columbus NCHP Proposed Pipeline Route



As required by Ohio 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.**

The proposed Project will be approximately 22,060 feet (4.2 miles) in length and consist of construction of a 20-inch diameter transmission class pipeline to replace the existing 18-inch and 20-inch-high pressure gas line.

Much of the 20-inch natural gas main will be constructed within the public road rights-of-way within the City of Columbus, as well as within permanent private pipeline easements. Exceptions include the crossing of other utility easements such as railroads, interstate roads, and environmental features such as streams and rivers. 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, or for commercially reasonable reasons, Columbia may utilize these methods interchangeably during construction in a manner that does not conflict with the information presented herein.

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 Ohio 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 recently begun implementing a comprehensive, three-part rule, aimed at increasing pipeline safety. These regulations are commonly known as 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.<sup>1</sup>

Moreover, replacing the existing 20-inch pipeline increases the reliability of a critical piece of Columbia's service to the Columbus area through the NCHP system.

**(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: Overview Map 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 yellow line.

**(4) 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 proposed route was developed taking into consideration private property, the density of below grade utilities impact to the public, and environmental features. The proposed route was purposely located within the public right-of-way as much as possible. A route analysis was performed, and the proposed route minimizes the number of residential homes and businesses affected by the proposed Project. Installation methods have been selected to further limit impact to high traffic roads, other infrastructure such as railroads, and environmental features. The proposed route is designed to minimize impacts to forested areas and natural resources. 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. There are multiple cultural resources previously recorded within a 0.5-mile radius of the proposed

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<sup>1</sup> 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).

alignment. The route impacts three property owners and seven parcels and crosses three railroad lines (two railroad companies). The route has 7,181 structures within 1,000 feet of the centerline, nine of which are schools and daycares and 18 are places 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 tenants of the nature of the project and the proposed timeframe for project construction and restoration activities.**

Columbia began reaching out to landowners in 2022 regarding this Project to obtain survey notice access and options for easements. Columbia will be conducting extensive conversations with many of the affected property owners and residents on this Project as Columbia negotiates options for easements. Columbia also plans to further communicate with customers through written communications in the form of mailings ahead of any additional needs of survey and construction start, a project website, as well as in local newspaper advertisement. The first letter will be the affected property communication required by the Ohio Adm.Code 4906-6-08(B).

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

If needed, tree and vegetation clearing is anticipated to begin in January 2024 (or following OPSB approval if not received by January 2024) and will be completed no later than March 31, 2024. Within city road rights-of-way, no trees are to be taken down unless it is necessary to do so, in which case any affected trees will be taken down with permission from the city per the requirements of the City of Columbus. Columbia has reviewed and designed the entire pipeline right-of-way to reduce and minimize environmental impacts to potential Indiana bat (*Myotis sodalis*, federally endangered) and northern long-eared bat (*Myotis septentrionalis*, federally threatened) roosting habitat. Columbia will adhere to the seasonal tree clearing restrictions recommended by federal and state agencies (October 1 to March 31). Columbia will not grind any tree stumps prior to obtaining the necessary stormwater permits for the Project. Installation of the proposed pipeline is scheduled to begin on or about April 15, 2024, and the in-service date

(completion date) of this Project is expected to be on or about September 30, 2024.

**(7) An area map of not less than 1:24,000 scale clearly depicting the facility 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 drawing depict the Project centerline, workspaces, railroads, 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 green lines. 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, Columbia has secured all permanent easements necessary to construct the pipeline route as intended.

**(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 proposed pipeline will be tested such that it will have an MAOP of 190 pounds per square inch gauge (psig). Columbia will be installing 20-inch main-line piping that is coated steel with a wall thickness of 0.375. The wall thickness of the pipe will increase to 0.500 inches where trenchless installation is used.

Columbia has begun contacting property owners along the pipeline route to secure permanent and/or temporary easements. In addition to the 0.24-mile length of the pipeline right-of-way, Columbia will be obtaining land rights for temporary staging areas that will be situated along the pipeline right-of-way and other areas needed during construction. 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. The discussion shall include:**

**(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) 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.**

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

**(c) The estimated 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 City of Columbus, Franklin County, Ohio. The current land use along the route is primarily comprised of residential and commercial properties, with minimal patches of forest. There are also transportation-related land use areas including three railroad crossings.

Currently, the route has 7,181 structures within 1,000 feet of the centerline. Nine schools and daycares and 18 places 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. There are state owned road rights-of-way being crossed by this Project. The majority of impacts anticipated for the proposed construction will be temporary in nature due to Columbia's plan to restore the pipeline right-of-way to the pre-construction contours when the Project is complete.

**(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 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.**

On behalf of Columbia, Colliers Engineering & Design ("CED") conducted a cultural resource desktop review and assessment for the Project. The cultural resource review and assessment of the 4.2-mile pipeline corridor conducted on May 31, 2023, desktop included, but was not limited to, a review of the Ohio History Connection's online database of recorded cultural resources. The Ohio History Connection serves as the State Historic Preservation Office ("SHPO") for Ohio. The database review encompassed both publicly available information and restricted archaeological information that can be accessed by qualified professionals. The desktop review determined that there were no documented above-ground historic or subsurface archaeological sites within the Project area. There are over one hundred previously recorded cultural resources within a 0.5-mile radius. Most of the study area has been disturbed by modern development. Based on information provided and the results of this desktop assessment, it is CED's

opinion that the previously documented resources in the immediate vicinity indicate a moderate to high probability for encountering archeological sites within or adjacent to the Project area. However, as proposed, the Project will not require any federal permitting and does not have any other federal nexus that would trigger the need for Section 106 review. This background review and assessment was conducted in support of Columbia’s compliance with Section 106 of the National Historic Preservation Act (“NHPA”).

A copy of the Cultural Report and correspondence with SHPO is included in Attachment G.

**(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 the letter of notification has been sent to the following public officials concurrently with its submittal to the Ohio Power Siting Board.

Franklin County	
John O’Grady	Kevin L. Boyce
Franklin County Commissioner	Franklin County Commissioner
President	373 S. High Street
373 S. High Street	Columbus, Ohio 43215
Columbus, Ohio 43215	
Erica C. Crawley	Kenneth N. Wilson
Franklin County Commissioner	Franklin County Administrator
373 S. High Street	373 S. High Street
Columbus, Ohio 43215	Columbus, Ohio 43215
Jennifer Fish	Cornell R. Robertson, P.E., P.S.
Franklin County Soil and Water	Franklin County Engineer
1404 Goodale Boulevard, Suite 100	970 Dublin Road
Columbus, Ohio 43212	Columbus, Ohio 43215

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



Mitchell J. Brown	Nicholas Bankston
Councilmember	Councilmember
90 W. Broad Street	90 W. Broad Street
Columbus, Ohio 43215	Columbus, Ohio 43215
Lourdes Barroso de Padilla	Rob Dorans
Councilmember	President Pro Tem
90 W. Broad Street	90 W. Broad Street
Columbus, Ohio 43215	Columbus, Ohio 43215
Shayla Favor	Emmanuel V. Remy
Councilmember	Councilmember
90 W. Broad Street	90 W. Broad Street
Columbus, Ohio 43215	Columbus, Ohio 43215
Scott Messer	Jennifer Gallagher
City of Columbus Director	City of Columbus Director
Department of Building and Zoning Services	Department of Public Service
111 N. Front Street	111 N. Front Street
Columbus, Ohio 43215	Columbus, Ohio 43215

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;
- 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) Construction Stormwater Permit and Stormwater Pollution Prevention Plan (SWPPP) requirements;
- City of Columbus Department of Public Service ROW Excavation Permit;
- Norfolk Southern Railroad Right of Entry Permit;
- Norfolk Southern Railroad Wireline and Pipeline License;

- CSX Right of Entry Permit;
- CSX Utility Permit;
- Ohio Department of Transportation Right-of-Way and Utility Permit; and
- Ohio EPA Hydrostatic Test Water Discharge 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.**

An Information for Planning and Consultation (IPaC) Official Species List was completed on May 22, 2023, on the USFWS website (<https://ipac.ecosphere.fws.gov/>). The USFWS Official Species Listed yielded three federally listed species, which include the Indiana bat (endangered), northern long-eared bat (endangered), and the round hickorynut (threatened). For the full Threatened and Endangered species memorandum, please see Attachment E. An excerpt of Attachment E is below:

According to the ODNR – Division of Wildlife, state-listed species for Franklin County (as of May 22, 2023), the following are listed as threatened and endangered species for Franklin County: Indiana myotis (*Myotis sodalis*; endangered), black bear (*Ursus americanus*; endangered), northern long-eared bat (*Myotis septentrionalis*; threatened), upland sandpiper (*Bartramia longicauda*; endangered), American bittern (*Botaurus lentiginosus*; endangered), cattle egret (*Bubulcus ibis*; endangered), lark sparrow (*Chondestes grammacus*; endangered), northern harrier (*Circus hudsonius*; endangered), sandhill crane (*Grus canadensis*; threatened), least bittern (*Ixobrychus exilis*; threatened), black-crowned night-heron (*Nycticorax nycticorax*; threatened), barn owl (*Tyto alba*; threatened), caddisfly (*Chimarra socia*; endangered), Iowa darter (*Etheostoma exile*; endangered), spotted darter (*Etheostoma maculatum*; endangered), tonguetied minnow (*Exoglossum laurae*; endangered), goldeye (*Hiodon alosoides*; endangered), northern brook lamprey (*Ichthyomyzon fossor*; endangered), shortnose gar (*Lepisosteus platostomus*; endangered), popeye shiner (*Notropis ariommus*; endangered), lake chubsucker (*Erimyzon sucetta*; threatened), tippecanoe darter (*Etheostoma tippecanoe*; threatened), paddlefish (*Polyodon spathula*; threatened), butterfly (*Ellipsaria lineolata*; endangered), elephant-ear

(*Elliptio crassidens*; endangered), purple cat's paw (*Epioblasma obliquata*; endangered), snuffbox (*Epioblasma triquetra*; endangered), longsolid (*Fusconaia subrotunda*; endangered), pink mucket (*Lampsilis abrupta*; endangered), pocketbook (*Lampsilis ovata*; endangered) washboard (*Megaloniaias nervosa*; endangered), clubshell (*Pleurobema clava*; endangered), Ohio pigtoe (*Pleurobema cordatum*; endangered), rabbitsfoot (*Theliderma cylindrica*; endangered), rayed bean (*Villosa fabalis*; endangered), black sandshell (*Ligumia recta*; threatened), threehorn wartyback (*Obliquaria reflexa*; threatened), fawnsfoot (*Truncilla donaciformis*; threatened), pondhorn (*Unio merus tetralasmus*; threatened), smooth greensnake (*Opheodrys vernalis*; endangered), Gattinger's foxglove (*Agalinis gattingeri*; threatened), spreading rock cress (*Arabis patens*; endangered) and pale umbrella-sedge (*Cyperus acuminatus*; endangered).

A project review request letter was submitted to ODNR on May 26, 2023, seeking review of the potential impacts of the proposed Project on federal and state listed species and their habitats within the Project area. The response from ODNR is included in Attachment E. Due to the Project type, size, location, and proposed implementation of seasonal tree cutting to avoid impacts to the federally listed bat species, Columbia anticipates that the Project, as proposed, is not likely to adversely affect the Indiana bat or northern long-eared bat.

The habitat within the proposed Project corridor is urban and primarily consists of residential and commercial areas with maintained lawn. Minimal patches 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*). Impacts to forested habitats will be avoided and minimized to the maximum extent practicable during construction. 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. Therefore, 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.

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). If there is a federal nexus for this Project, no tree clearing should occur on any portion of the Project area until consultation under Section 7 of the ESA is completed. The proposed Project does not require a federal permit, federal review, and/or authorization, or the use of federal funding to complete the Project. Therefore, Section 7 consultation is not required for the proposed Project.

**(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 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. 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. As indicated above, 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, or for commercially reasonable reasons, Columbia may utilize these methods interchangeably during construction in a manner that does not conflict with the information presented herein. 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. Specifically, map numbers 39049C0169K, 39049C0188K, and 39049C0189K mapped the area of the proposed Project were reviewed. The FEMA FIRM identified a regulated floodplain west of the Project. The floodplain is associated with the Scioto River. The proposed pipeline would not impact any mapped floodplain areas. 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.

A review of the National Wetlands Inventory (NWI) database does not identify any NWI-mapped feature identified within the route. A copy of the NWI maps for the Project is included as Figure 3 in the Wetland Delineation Report located in Attachment C.

A wetland and waterbody field survey was conducted in a study corridor that encompassed a 100-foot-wide survey corridor for a length of 4.2 miles on March 2 and 3, 2022 and May 19, 2023. During the field survey, no wetlands or waterbodies were identified. The study corridor surveyed during the wetland delineation included the Project corridor and a 100-foot buffer centered along the proposed centerline. The proposed route will include a nominal 75-foot wide (50-foot permanent easement and 25-foot temporary easement) construction footprint. The Project alignment avoids such regulated environmentally sensitive features. A copy of the Wetland Delineation Report is included in Attachment C.

Impacts to vegetation along the proposed pipeline route will be minimal. Forested habitat impacts have been minimized to the maximum extent practicable and will consist of clearing of landscaping trees, fence rows, and trees within small patches of forested habitat. Common tree species observed within the Project area include sweetgum, loblolly pine, red maple, and American beech.

**(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/ Joseph M. Clark

**Attachment A**

**Project Map**