

**4906-4-04**

**PROJECT AREA SELECTION AND SITE DESIGN**

#### 4906-4-04 – Project Area Selection and Site Design

**(A) The applicant shall describe the selection of the project area. Examples of information that are relevant to this description include:**

The general routing process begins with the identification of a study area, which establishes the geographic boundaries for analysis between defined endpoints. Route segments are then developed within this study area to form a preliminary network of potential routes. Routing analysis criteria and associated weights are determined, that encompass environmental, social, and engineering factors. After the route network and evaluation criteria are identified, a quantitative analysis is conducted. For the quantitative analysis of this Project, a Z-score was utilized to normalize diverse data layers on a common scale for objective comparison as well as weighted criteria to run the analysis. Following this quantitative assessment, routes are then qualitatively reviewed for items such as verifying that the route can accommodate construction logistics and the long-term operation of the pipeline.

**(1) A description of the study area or the geographic boundaries of the area considered for development of the project, including the rationale for the selection.**

The Project, as proposed by Columbia, consists of a new 12-inch and 20-inch diameter, high pressure natural gas pipeline. The route selection process employed by Columbia for the Project started with the identification of a Study Area that would be analyzed for routing options for the 20-inch main line. Because the 12-inch pipeline location is dependent on the 20-inch pipeline location, it was not included in the routing options analysis. The Study Area was developed both to provide direct routes between the existing station locations and to provide geographical flexibility for the development of route options. It was defined by the tie-in locations to access the existing system.

Study Area Description: The Study Area, shown in Figure 3, originates directly east of the Ohio State University Airport and extends approximately 4.6 miles east to approximately 1 mile east of Interstate 71 (“I-71”) and Dublin Granville Road. From here, the Study Area extends south approximately 2.2 miles to approximately 1.7 miles east of where I-71 and Morse Road intersect. The Study Area then travels west approximately 4.6 miles before turning back north and extending approximately 2.2 miles back to the northwest corner. The Study Area

is entirely within Franklin County, Ohio. The cities of Columbus and Worthington as well as the Village of Riverlea, and the Townships of Perry and Sharon are located inside the Study Area (Figure 4). These communities include areas of dense residential development, commercial and business areas, schools, religious institutions, and light industrial areas. The Study Area is predominantly residential communities.

Rationale for Selection: The Study Area provides a basis for identifying and comparing routing options for the Project. The Study Area was defined in a manner that allowed consideration of potential Project routing options that met the need to develop a centerline that ties into the existing system at a distinct starting point at the Postlewaite Station and ending point at the Karl Road Station. For the routing analysis, a 50-foot "Routing Study Corridor" width was used for evaluating the potential impacts.

- (2) A map of suitable scale that depicts the boundary of the study area, all siting constraints, and the general sites, routes, and/or route segments which were evaluated.**

Figure 4 shows the boundary of the Study Area, constraints Columbia was aware of within the Study Area, and the route segments which were evaluated.

- (3) A comprehensive list and description of all qualitative and quantitative siting criteria utilized by the applicant, including any weighting values assigned to each.**

As further described in Adm.Code 4906-4-04(A)(4), the process of identifying candidate routes included consideration of, and qualitative comparison of various relevant construction, environmental, cultural, and social categories within the Study Area. Route evaluation consisted first of a comparison of the potential routes based on specific evaluation criteria, which were then assigned a "Z-Score." These criteria address human and environmental factors, cost, and feasibility. Selected criteria can be divided into three categories: engineering, social, and environmental. Not all factors carry equal weight within the Study Area. For instance, though both require consideration, the number of crossed streams is typically of greater concern than the number of major roads crossed. To make the evaluation more sensitive to local conditions, relative weights are applied to each

criterion, which yielded Total Weighted Z-Scores. Higher weights are placed on criteria that should most influence the selection of the proposed project route. Siting criteria and associated weights assigned for this Project are shown in Table 3.

**Table 3: Siting Criteria and Weighting Value**

<b>Route Criteria</b>	<b>Weight</b>
<b>Engineering</b>	
Total length	8
Number of heavy angles (>25 degrees)	3
Number of road crossings	4
Major road crossings	2
Length across slope greater than 15%	4
Trenchless crossings	1
Foreign pipeline crossings	2
Length along institutional land use	2
Length along residential land use	2
Annual average daily traffic	1
Length not through public easement	3
Length through karst/shallow bedrock	5
<b>Environmental</b>	
Woodland within the Routing Study Corridor	5
Wetland within the Routing Study Corridor	6
Length through floodplain	3
River, stream, or waterway crossed	5
Archaeological sites in the Routing Study Corridor	7
National Register of Historic Places (“NRHP”) listed resources within 500 feet of centerline	4
Protected watersheds crossed	6
<b>Social</b>	
Residences within 100 feet of centerline	3
Residences within 101-150 feet of centerline	2
Residences within 151-300 feet of centerline	1
Landowners/crossed by centerline	4
Public facilities within 300 feet of centerline	3
New ROW required	6
Length of public land crossed	9

As evidenced by these Siting Criteria and Weighting Values, the route selection process showed preference for routes that:

- Are shorter and more direct;
- Involve the fewest landowners possible by using larger parcels, multiple parcels with the same owner, and constructing the pipeline within the public ROW;
- Result in minimal change to land use, such as avoiding the clearing of forests for the right-of-way;
- Minimizing residences within close proximity of 100 feet; and
- Cause the fewest impacts to aesthetic and cultural resources, wetlands, streams, and vegetation.

Further evaluation of the Study Area identified that the route options are significantly constrained by several key geographical and man-made features in the Study Area. The Olentangy River presents a major natural barrier, limiting viable crossing points and methods of crossing. Further channeling the potential routes are the existing interstate and railroad corridors, which are formidable linear obstacles that can only be crossed at certain locations where crossing methods are approved since these areas typically cannot be trenched. These combined criteria create a narrow corridor of feasible routing options, shaping the route segment options within the Study Area.

**(4) A description of the process by which the applicant utilized the siting criteria to determine the proposed project area and any alternative area(s).**

To evaluate possible routes within the Study Area to select the proposed Project route and an alternate route, a three-step process was used following development of the Study Area:

- Development of the route segment network
- Performing a quantitative (Z-Score) characterization and analysis of possible routes within the Study Area based on the route segment network.
- Reviewing qualitatively the top scoring routes.

The following information provides additional information on each of these steps.

### *Route Network Development*

Route development is the foundational phase of the selection process. It occurs before quantitative statistical analysis and involves identifying and drawing potential pathways within a designated Study Area. The primary goal is to establish viable route segments that balance engineering feasibility with the need to minimize disruption to landowners, communities, and the natural environment. This development essentially is to draw paths that are preliminary route segments connecting the start and end points. These pathways navigate around identified constraints such as houses and buildings and follow identified opportunities where technically feasible such as public roadways for densely populated areas.

### *Quantitative Z-Score Analysis*

After identifying the initial route options (Figure 5) and confirming their preliminary constructability, the route network analysis begins with the quantitative Z-score analysis using the criteria provided in the response to Adm.Code 4906-4-04(A)(3) as detailed below. The routing evaluation involved diverse, non-comparable criteria, including overall length, acreage, and counts of specific resources. Because of the volume of route options and varying measurement units, comparing the routes required advanced data analysis. To identify a route that minimizes overall impact, a statistical Z-score analysis was used to screen the alternatives and narrow the options to a manageable number for further evaluation.

A Z-score, also known as a standard score, is a statistical measurement that describes a criteria's value relationship to the average (mean) of a group of values. It is measured in terms of standard deviations from the mean. To calculate the Z-scores, the criteria totals were summed for each potential route and evaluated them against the dataset mean. This process involves the following steps:

1. Establish the Mean – Determine the average value for a specific criterion (such as total length) across all proposed routes.
2. Calculate the Deviation – Measure how far each individual route deviates from that average (standard deviation).

3. Assign the Z-Score – A route equal to the average receives a score of zero. A route with above-average impacts receives a positive score, while a route with below-average impacts receives a negative score.
4. Apply Criteria Weights – Multiply each Z-score by a predetermined weight factor (as shown on Table 3) to reflect that certain criteria have a greater influence on project success, social impacts, and environmental concerns than others.
5. Sum the Scores – Combine the weighted Z-scores for every criterion on a given route to produce a total weighted Z-score (“Total Weighted Z-Score”).

Because lower Total Weighted Z-Scores represent fewer overall impacts, the routes were arranged in ascending order, from lowest Total Weighted Z-Score to highest. While Z-scores streamline extensive data into a manageable index, they only reflect quantified criteria. They do not provide a definitive final comparison, but rather serve as a screening tool to identify the most viable options.

#### *Qualitative Constructability Review and Refinement*

Following the quantitative Z-Score analysis, a qualitative review was conducted of the highest-performing routes (based on Total Weighted Z-Score) to assess practical constructability. This review addressed factors that are difficult to quantify, such as the logistics and safety challenges of working within interstate corridors.

Based on this constructability assessment, a few highly ranked routes were eliminated. The remaining top route options were then refined, making minor adjustments such as replacing open-trench segments with HDD alignments to optimize construction and minimize environmental impacts.

- (5) A description of all public involvement that was undertaken in the site/route selection process, including a description of how many and what types of comments were received.**

Columbia held public informational meetings (“PIMs”) for the Project on October 1, 2025; April 8, 2026; and May 7, 2026. The PIMs were open house, drop-in-style events with subject matter specialists from Columbia present to answer questions from community members. Informational boards regarding the Project purpose

and need, environmental and vegetation management, Project planning steps, Project timeline, construction, traffic management, Project map, health and safety, and state and federal requirements were displayed throughout the meeting space for community members to view at their leisure. Examples of the informational boards presented at the PIMs are included in Appendix E.

Approximately 35 individuals attended the October 1, 2025 PIM. The public was able to directly address subject-matter specialists from Columbia and their representatives, submit questions via written questionnaires, mail in questionnaires, and interactive map stations available at the PIM. Eleven written comments were received during the October 1, 2025 PIM. Attendees had the opportunity to mail in questionnaires until October 15, 2025, and none were received. Most of the written questionnaires received at this PIM involved concerns associated with specific details related to construction, specifics related to the overall Project timeline, and Project route. Ten interactive map comments were received during the October 1, 2025 PIM. Most interactive map comments received at this PIM involved concerns associated with ways to mitigate impact to landscaping, ways to mitigate construction impacts and questions about the duration of construction.

Approximately 33 individuals attended the April 8, 2026 PIM. The public was able to directly address subject-matter specialists from Columbia and their representatives, submit questions via written questionnaires, mail in questionnaires, and interactive map stations available at the PIM. Fifteen written comments were received during the April 8, 2026 PIM. Attendees had the opportunity to mail in questionnaires until April 22, 2026, and none were received. Most of the written questionnaires received at this PIM involved concerns associated with requests on the final preferred and alternate route, more robust construction information and environmental concerns. Eleven interactive map comments were received during the April 8, 2026 PIM. Most of the interactive map comments received at this PIM involved concerns associated with ways to mitigate impact to surrounding communities and route preferences.

Approximately 28 individuals attended the May 7, 2026 PIM. Attendees had the opportunity to engage directly with subject-matter specialists from Columbia and its representatives, submit questions via written or mailed questionnaires, and provide input through interactive map stations available at the meeting. At the

May 7, 2026 PIM, there was an additional “How We Serve You” board added that illustrated the flow of natural gas from the compressor station, through the interstate pipeline, to the city gate metering station where custody of the gas is transferred to the utility, then to the area gas regulator station, and ultimately through the distribution system. Twelve written comments were received during the May 7, 2026 PIM. Most of the written comments received at this PIM involved concerns associated with the route and potential impacts to infrastructure and residences, anticipated construction timeline and process, and potential impacts to landscaping and surrounding community features. Attendees had the opportunity to mail questionnaires until May 21, 2026, and none were received. Fourteen interactive map comments were received during the May 7, 2026 PIM. Most of the interactive Map comments received at this PIM involved concerns associated with disruptions to traffic or community activities and mitigating impact to surrounding landscaping.

Written comments received during the three PIMs are included in Appendix E.

As described in response to Adm.Code 4906-4-06(E)(1), Columbia also established a phone line (800-242-6227) and email address (NCHP@nisource.com) to address specific customer questions and concerns about the Project. Columbia received one comment via its established email on the proposed Project route.

**(B) For a proposed electric generation facility, describe the process of designing the facility layout. Examples of information relevant to this description include:**

- (1) A constraint map showing setbacks from residences, property lines, utility corridors, and public rights-of-way, and any other constraints of the site design.**
- (2) A description of the criteria used to determine the facility layout and site design, and a comparison of any site design alternatives considered, including equipment alternatives where the use of such alternatives influenced the site design.**

Adm.Code 4906-4-04(B) does not apply to this Project.

**(C) For a proposed electric power transmission line or gas pipeline:**

**(1) The applicant shall conduct a site and route selection study prior to submitting an application for an electric power transmission line or gas pipeline, and associated facilities. Examples of information for inclusion in the study include:**

**(a) A description of practicable sites, routes, and route segments for the proposed facility within the study area.**

Please see Columbia's response to Adm.Code 4906-4-04(A)(4) for more information on the routing process utilized. A summary of the results of that process is detailed below.

A total of 35 route segments combined to create 90 unique routes that were analyzed. Refer to Figure 5 for the route segments. No single route was the least impactful across all measured criteria. For example, a route might have the shortest length through a floodplain but contain more wetland acreage within the 50-foot Routing Study Corridor than other route options. Therefore, a comparison was performed of routes across a variety of criteria to identify impact trends and patterns to help select a proposed Project route and an alternate route.

Analyzing the quantified data (Total Weighted Z-Scores) revealed trends among groupings of routes with similar geographic characteristics. The least impactful routes utilized segments 1, 3, and 8. The top 15 routes all began with these segments and achieved Total Weighted Z-Scores of -11.1 or lower. Their low scores were driven primarily by their short overall length, as they extended straight down West Rathbone Avenue entirely within existing public ROW. These routes also scored well in other categories, including foreign pipeline crossings, length through karst and shallow bedrock, floodplain crossings, stream crossings, and length through protected lands.

While routes utilizing segments 1, 3, and 8 performed well overall, specific route configurations using these segments still yielded higher impacts in certain categories, such as trenchless crossings, stream crossings, and archaeological sites within the Routing Study Corridor. However, any route combination that derived from segments 1 or 3 but deviated from the West

Rathbone Avenue alignment incurred more angles, increased length, greater tree clearing, and higher overall Total Weighted Z-Score impacts because it moved outside the public ROW. By comparison, routes using segments 7 and 10 were more impactful than the top options but less impactful than those using segments 4, 5 or 6, which presented greater angles, lengths and woodland impacts.

Following the PIM on October 1, 2025, and residential feedback, it was determined that the alternative route needed more geographic diversity west of the CSX and Norfolk Southern railroad tracks. Additional segments were added to be evaluated since some of the initial segments in that area were determined to not be constructible due to existing constraints such as exclusive easements. Adding these segments required renumbering the route network. Refer to Figure 6 for the adjusted route segments. An additional review of the revised segments to develop an alternate route that provided diversity on the western side from the proposed route to address residential feedback from the PIM on October 1, 2025. This alternate route underwent a qualitative review, resulting in minor alignment adjustments and is shown in Figure 7 with the proposed Project route. This revised alternative route was presented during the April and May 2026 PIMs.

**(b) A description of the routes and sites selected for evaluation, and the factors and rationale used by the applicant for selecting the route or site.**

Refer to Figure 7 for the proposed Project route and the alternative route.

**Proposed Project Route:** The proposed Project route is primarily within existing public ROW. The route begins on Postlewaite Road for approximately 0.1 miles, heads east along Bethel Road for approximately 0.4 miles before turning south on Olentangy River Road briefly and is then proposed to HDD to cross the Olentangy River, surfacing on West Rathbone Avenue. From there, the alignment continues for approximately 0.5 miles along West Rathbone Avenue before transitioning to Morse Road for approximately 0.9 miles before another HDD crosses under the CSX and Norfolk Southern railroads and I-71. After the crossing, the route returns to Morse Road for approximately 1.0 miles, turns north onto Karl Road for approximately 1.4 miles, and concludes by heading east for approximately 0.1 miles to the final tie-in point.

The recommended proposed Project route provides the best balance of potential impacts. It performed better than average in length, angles over 25 degrees, pipeline crossings, length through wetlands, length through woodlands, length through floodplain, stream crossings, new ROW required, length through public/protected lands, and had less residences between 0 and 300 feet of centerline than the average. The proposed Project route performed worse than average in major road crossings, annual average daily traffic (for construction), NRHP listed resources within 200 feet of the centerline, number of parcels crossed, and more public facilities within 300 feet of centerline than the average.

The proposed Project route was chosen as the preferred option primarily for its nearly straight alignment and being situated within existing public ROW. Additionally, it had less residents within 0 and 100 feet from centerline in comparison to other route options.

The proposed Project route is the preferred option due to its greater utilization of public ROW and more efficient design. The proposed Project route, particularly the crossing of the Olentangy River, avoids local parks and prevents the loss of recreational fields during construction. Additionally, the proposed Project route requires fewer fittings and reduces the overall pipe length. This streamlined design places less stress on the system, which can promote greater longevity for the pipeline compared to the alternate route. The proposed Project route also is 1,970 feet away from a known eagle's nest which further away by approximately 980 compared to the alternate route. At time of filing, all of the private landowners are willing to grant easements so condemnation is not anticipated.

**Alternate Route:** The alternate route is also primarily within existing public ROW. The route begins on Postlewaite Road for approximately 0.1 miles, heads east along Bethel Road for approximately 0.4 miles before turning south on Olentangy River Road briefly and is then proposed to HDD to cross the Olentangy River diagonally, surfacing near Kenney Park. From here, the alternate route turns east near a shopping center for approximately 0.2 miles before turning south onto Graceland Avenue. The alternate route extends east along Graceland Avenue for approximately 0.35 miles before turning south on US Highway 23 for approximately 0.25 miles until reaching Morse Road. The alternate route follows the proposed Project route for approximately 1.8 miles

including the HDD crossings under the CSX and Norfolk Southern railroads and I-71 until reaching Kingshill Drive where the alternate route turns north. The alternate route travels along Kingshill Drive for approximately 0.4 miles until it reaches Urban Drive where it then turns east. The alternate route extends along Urban Drive for approximately 0.4 miles and turns north on Atwater Drive for approximately 0.1 miles before heading back east on Norma Road. The alternate route reaches Karl Road after extending 0.25 miles on Norma Road and continues north on Karl for approximately 0.9 miles and concludes by heading east for approximately 0.1 miles to the final tie-in point.

The alternate route performed better than average in length across slope, pipeline crossings, length along institutional areas, length through public easement, length through wetlands, stream crossings, and had less residences between 0 and 150 feet of centerline. The alternative route performed worse than average in road crossings, length along residential areas, length through floodplain, public facilities within 300 feet of the centerline, new ROW required, parcels crossed, residences within 151 and 300 feet of centerline, and length through public and protected lands.

The alternate route is not recommended due to several environmental, logistical, and community impacts. Selecting this path would necessitate condemnation proceedings on the Graceland property, adding at least two years to the construction timeline and incurring more financial impacts and legal fees. Columbia estimates that the alternative route would cost an additional \$17 million to construct based on the additional length of the route. The alternative route would disturb existing baseball parks and soccer fields. The alternate route is also 980 feet closer to the known eagle's nest location compared to the preferred option. Combined with various other environmental criteria, such as the total length crossed through Federal Emergency Management Agency ("FEMA") floodplain and total length through residential areas, the alternate route is less preferred to the proposed Project route. Additionally, there is a "zig zag" through public roads on the eastern side of the alternate route that will require more impacts in residential communities. In this location, the options to HDD are not as preferred so most of this area would be open trenched with reduced workspace and cause impacts and/or closures to driveways. This would lead to more complicated MOT plans and coordination with the city.

***PHMSA Compliance Concerns***

If the alternate route is selected, Columbia has significant concerns about meeting PHMSA requirements. It is anticipated that condemnation will be required to acquire the necessary land rights along this path, specifically through Graceland based on previous conversations with landowners. The resulting legal proceedings and associated timeline delays could jeopardize the Project's ability to serve as Columbia's means of meeting its PHMSA requirements.

- (2) The applicant shall provide a summary table of factors identified in the study. Examples of information for inclusion in the summary table include: a comparison of the routes, route segments, and sites, utilizing the technical, financial, environmental, socioeconomic, and other factors identified in the study; and, the design and equipment alternatives where the use of such alternatives influenced the siting decision.**

The Project is located in part of central Ohio that remains primarily developed residential and commercial in nature. Based on available data, 1,095 potentially occupied residences have been identified within 300 feet of the proposed Project route centerline and 356 potentially occupied residences were identified within 100 feet of the centerline. Comparatively, 1,642 potentially occupied residences have been identified within 300 feet of the alternate route centerline and 419 potentially occupied residences have been identified within 100 feet of the centerline. Table 4 shows a comparison of various parameters evaluated for each Project centerline option. Please see Columbia's response to Adm.Code 4906-4-04(C)(1)(b) for more details on the proposed Project route versus the alternate route.

**Table 4: Project Comparisons, Considering Technical, Environmental, and Social Variables, Franklin County, Ohio**

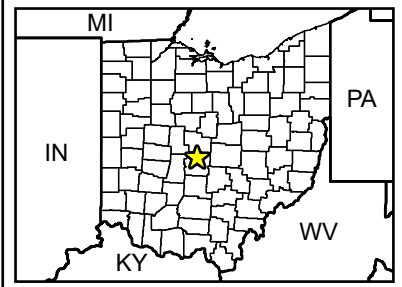
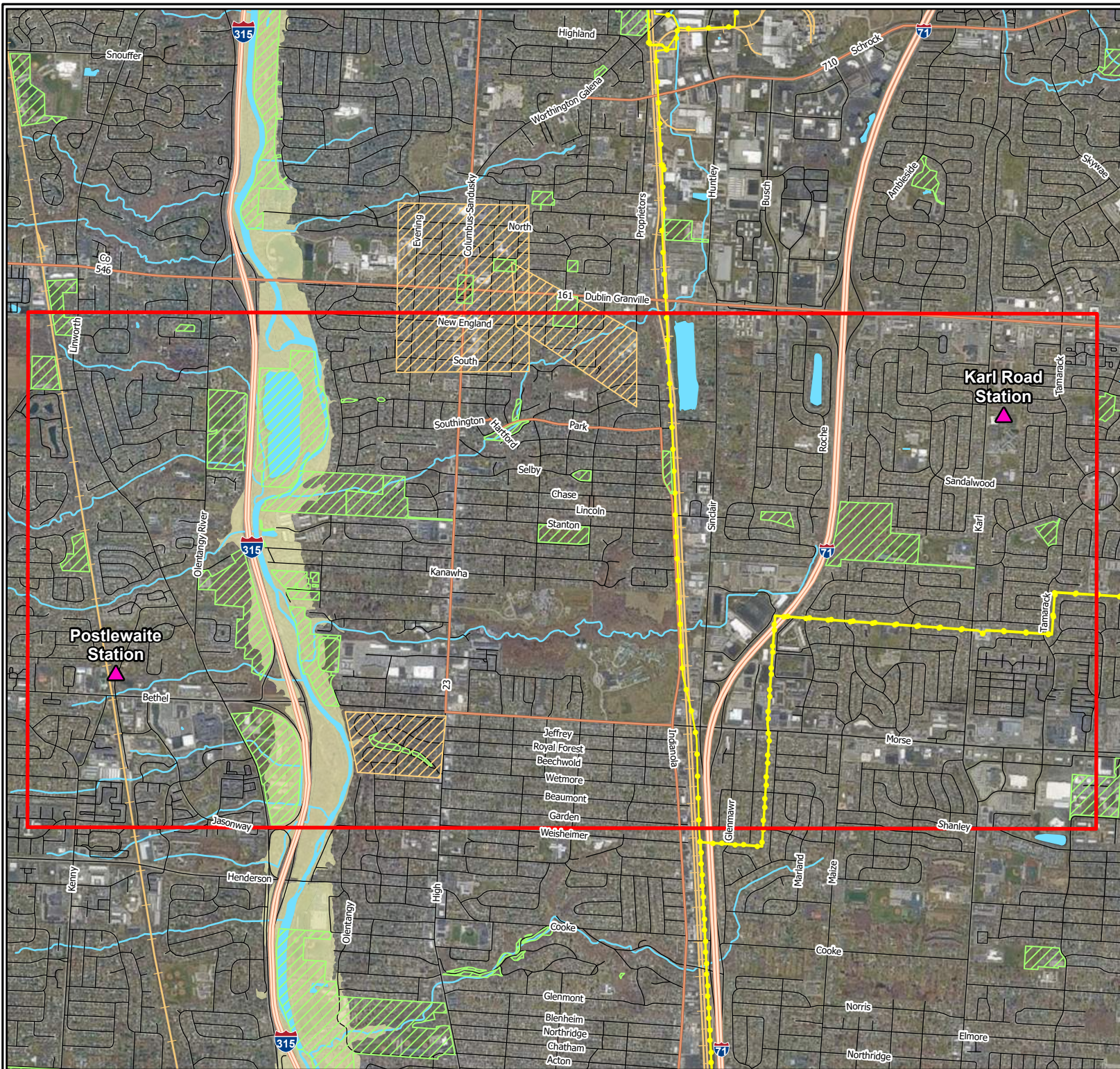
<b>Evaluation Criteria</b>	<b>Proposed Project Route<sup>1</sup></b>	<b>Alternate Route</b>
<b>Engineering</b>		
Number Road crossings (count)	38	48
Angles over 25 degrees (count)	20	32
Length not through public easement (feet)	6,498	12,510
Total length (feet)	28,610	31,645

<b>Evaluation Criteria</b>	<b>Proposed Project Route<sup>1</sup></b>	<b>Alternate Route</b>
<b>Environmental</b>		
Length across slope greater than 15% (feet)	567	400
Trenchless crossings (count)	5	3
Major road crossings (count)	14	18
Foreign pipeline crossings (count)	6	6
Length along institutional (feet)	3,571	3,571
Length along residential (feet)	5,770	7,201
Length through karst/shallow bedrock (feet)	5,732	7,271
Length through woodland in the Routing Study Corridor (feet)	427	439
Length through wetlands in the Routing Study Corridor (feet)	198	172
Length through FEMA floodplain (feet)	848	1,561
Streams/waterways crossed (count)	2	2
Archeological sites in the Routing Study Corridor (count)	0	0
NRHP listed historic resources within 500 feet of centerline (count)	2	2
Protected watershed impacts	1	1
<b>Social</b>		
Residence within 100 feet of centerline (count)	356	419
Residences within 101-150 feet of centerline (count)	83	70
Residences within 151-300 feet of centerline (count)	656	1,153
Number Parcels crossed (count)	16	24
Public facilities within 300 feet of centerline (count)	16	11
New ROW required (acres)	4.8	11.9
Length of public land crossed (feet)	303	2,329

Notes:

1. The length of the proposed Project route in the site selection varies from the current designed route. The proposed Project route has been further refined as engineering and construction reviews have been conducted.

**FIGURE 3**  
**Study Area**



- Legend**
- ▲ Station
  - Study Area
  - Protected Area
  - NRHP Area
  - Existing Transmission
  - Interstate
  - Highway
  - Road
  - Railroad
  - Waterbody
  - FEMA Floodplain

Rev #1  
 Scale: 1:250,000  
 Date: 9/15/2025  
 Data Sources: Burns & McDonnell,  
 ESRI, Source 3, Source 4

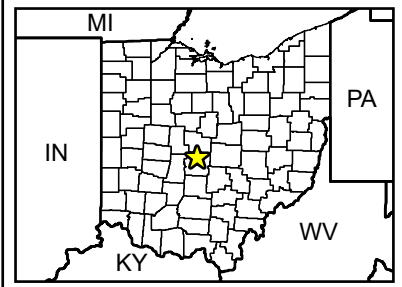
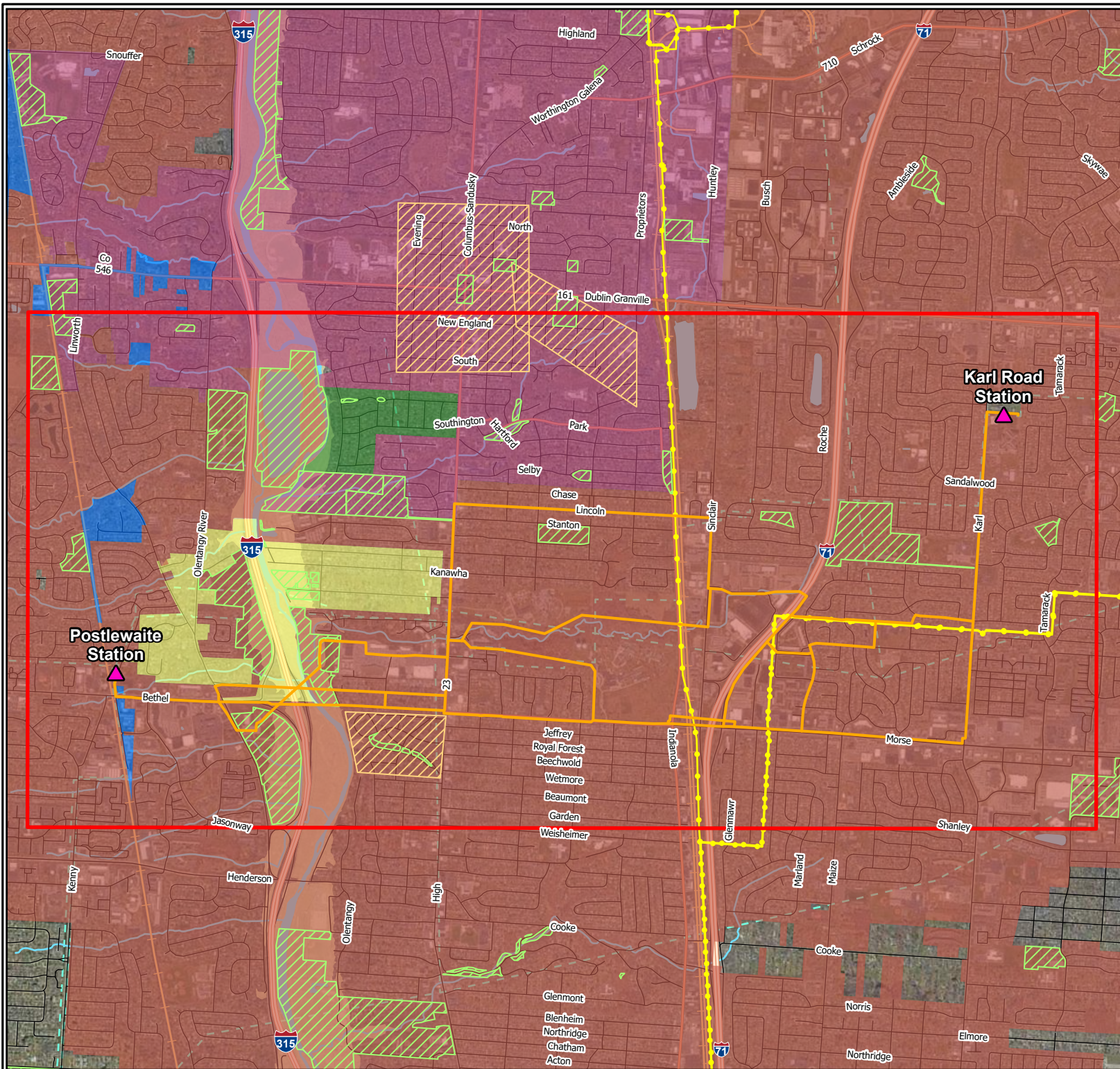
0                      1/2                      1  
 Miles

**Study Area**

Franklin County, OH

**FIGURE 4**

**Study Area Constraints**



**Legend**

- Station
- Study Area
- Route Segment
- Columbus
- Riverlea
- Worthington
- Perry Township
- Sharon Township
- Protected Area
- NRHP Area
- Existing Transmission
- Interstate
- Highway
- Road
- Railroad
- Pipeline
- Waterbody
- FEMA Floodplain

Rev # 1  
 Scale: 1:250,000  
 Date: 5/6/2026  
 Data Sources: Burns & McDonnell, ESRI, Source 3, Source 4

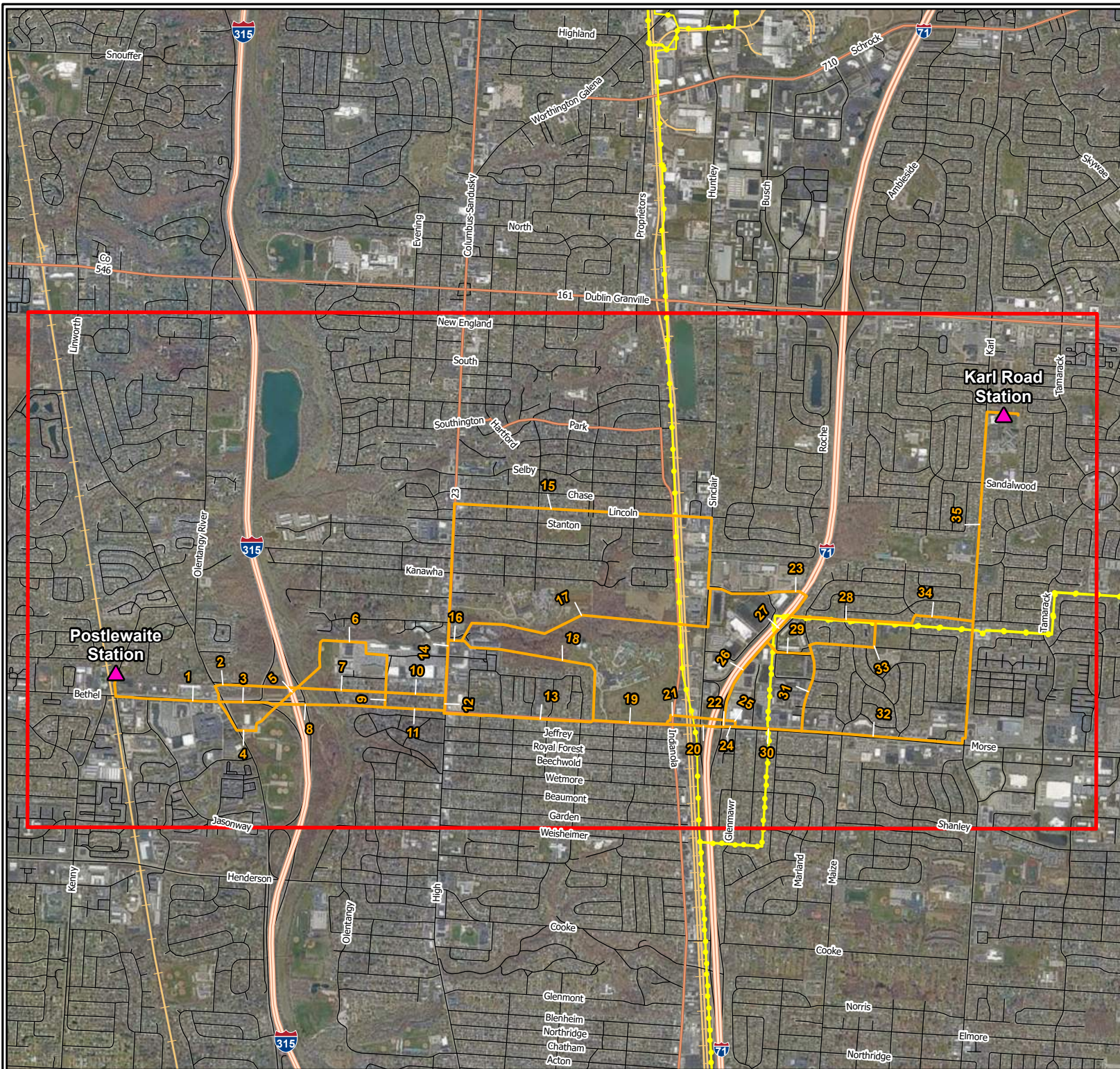
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**Study Area Constraints**

Franklin County, OH

**FIGURE 5**

**Route Segment Network**



**Legend**

- Station
- Study Area
- Route Segment
- Existing Transmission
- Interstate
- Highway
- Road
- Railroad

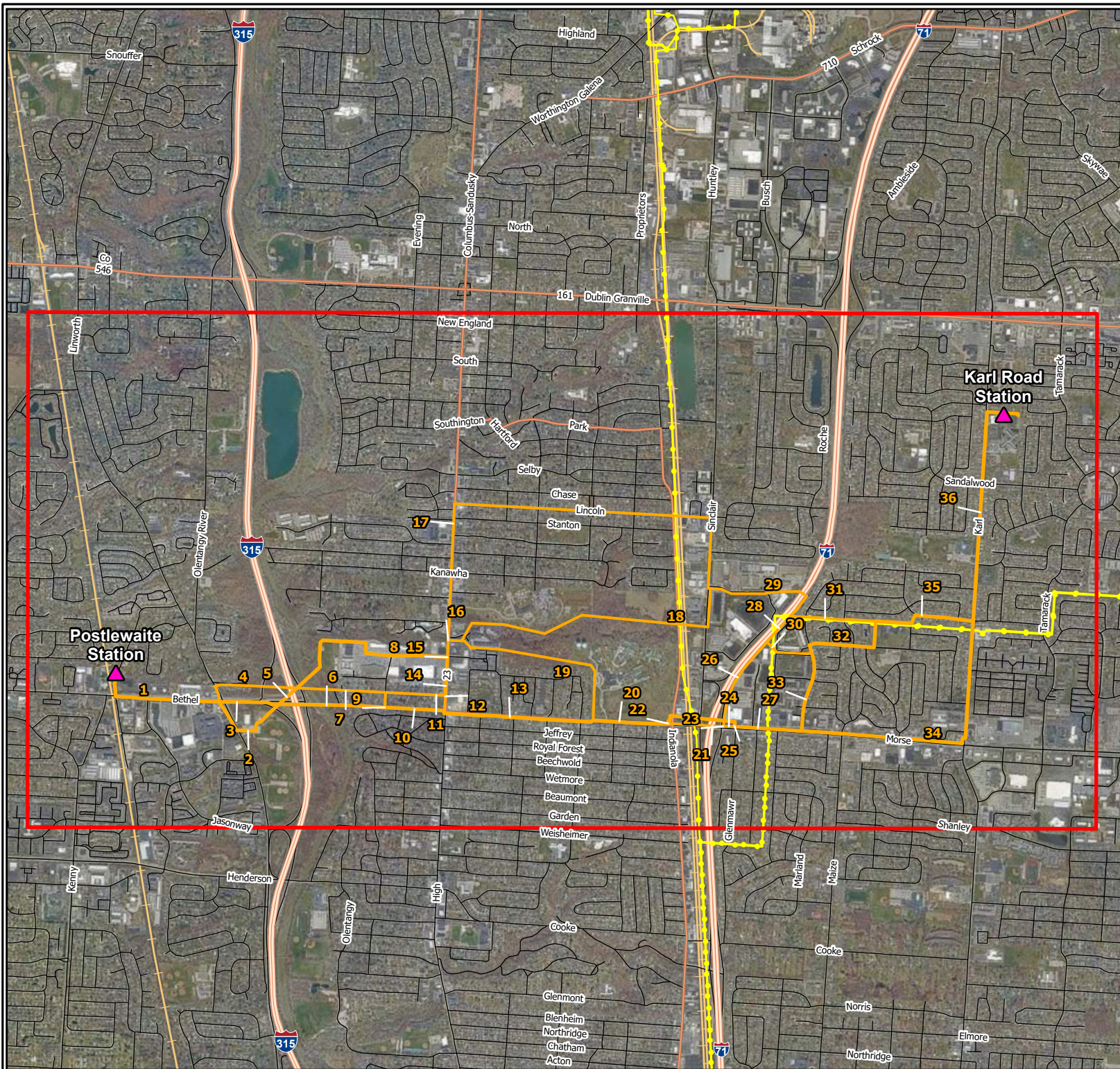
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

**Route Segment Network**

Franklin County, OH


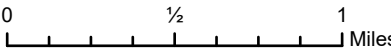
**FIGURE 6**

**Adjustments Route Segments**



- Legend**
-  Station
  -  Study Area
  -  Route Segment
  -  Existing Transmission
  -  Interstate
  -  Highway
  -  Road
  -  Railroad

Rev #1  
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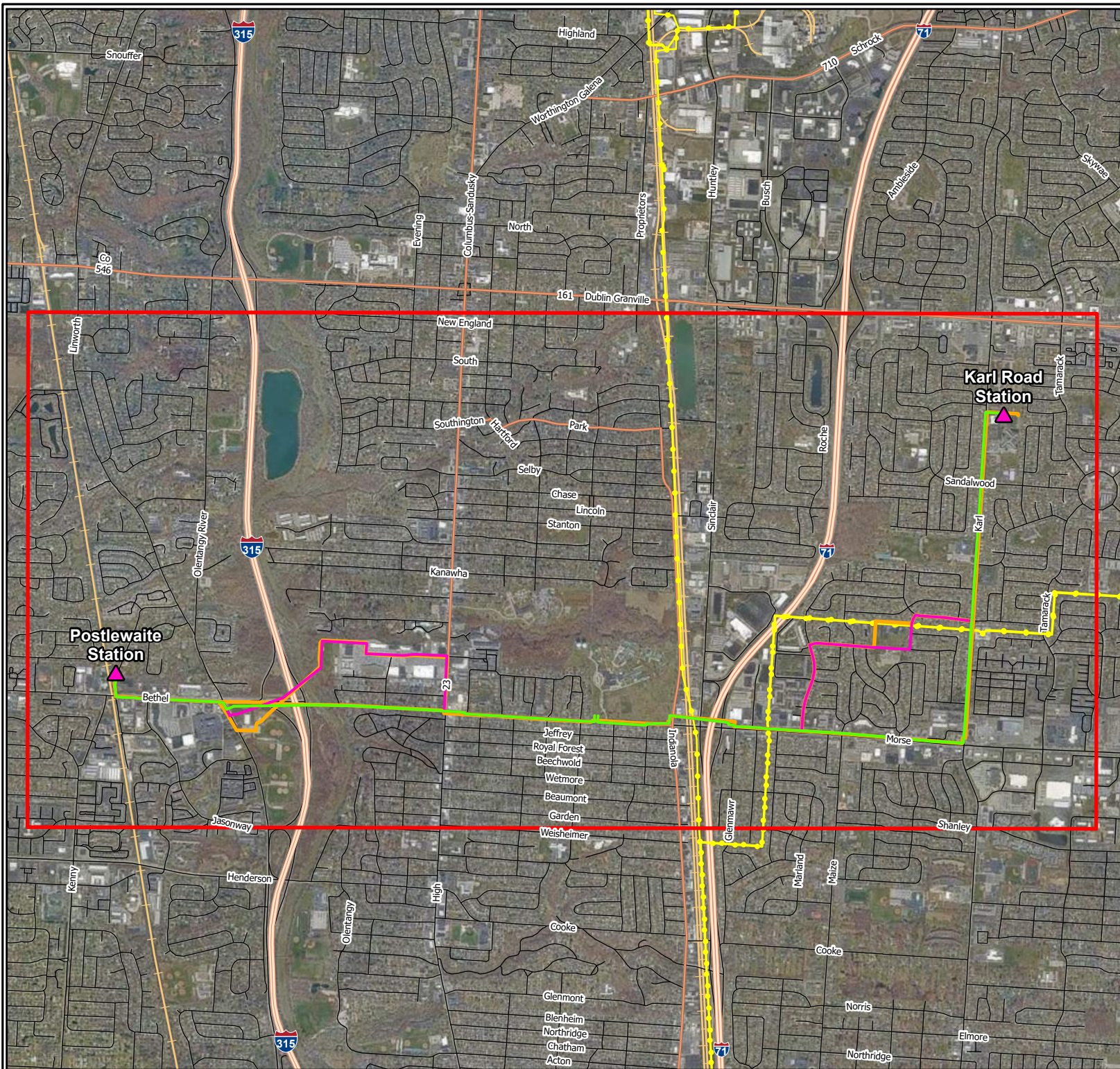
**Adjustments  
Route Segments**

Franklin County, OH



**FIGURE 7**

**Adjusted Proposed and Alternate Routes**



- Legend**
- Station
  - Study Area
  - Route Segment
  - Adjusted Proposed Route
  - Adjusted Alternate Route
  - Existing Transmission
  - Interstate
  - Highway
  - Road
  - Railroad

Rev #1  
 Scale: 1:250,000  
 Date: 3/17/2026  
 Data Sources: Burns & McDonnell, ESRI, Source 3, Source 4

0 1/2 1 Miles

**Adjusted Proposed  
and Alternate  
Routes**

Franklin County, OH

**4906-4-05**

**ELECTRIC GRID INTERCONNECTION**

## 4906-4-05 – Electric Grid Interconnection

**(A) The applicant shall provide a description of the proposed electric power transmission lines or gas pipelines, as well as switching, capacity, metering, safety, and other equipment pertinent to the operation of the proposed electric power transmission lines and gas pipelines and associated facilities, including any provisions for future expansion. Examples of information relevant to future use and expansion include a description of:**

**(1) For electric power transmission lines:**

- (a) Design voltage.**
- (b) Tower designs, pole structures, conductor size and number per phase, and insulator arrangement.**
- (c) Base and foundation design.**
- (d) Cable type and size, where underground.**
- (e) Other major equipment or special structures.**

Adm.Code 4906-4-05(A)(1) does not apply to this Project.

**(2) A description of the proposed major equipment, such as:**

- (a) Breakers.**
- (b) Switchgear.**
- (c) Bus arrangement and structures.**
- (d) Transformers.**
- (e) Control buildings.**
- (f) Other major equipment.**

Adm.Code 4906-4-05(A)(2) does not apply to this Project.

**(3) For gas pipelines:**

- (a) Maximum allowable operating pressure.**

The proposed pipeline MAOP is 190 psig.

**(b) Pipe material.**

The proposed pipeline will be carbon steel pipe with fusion-bonded epoxy coating.

**(c) Pipe dimensions and specifications.**

The proposed pipelines will have outside diameters of 20- and 12-inch pipe nominal wall thickness for all the pipelines will be 0.375 inches, and pipe lengths of approximately 40 feet (double random length). The 20- and 12-inch pipe will be manufactured in accordance with American Petroleum Institute (“API”) Specification 5L, Grade X-52 (specified minimum yield strength of 52,000 pounds per square inch). The MAOP of the 20-inch and the 12-inch pipeline will be 190 psig. The Project is designed to a design pressure of 720 psig on the 20-inch and 12-inch steel replacement. When installed and tied in, the newly installed segments will have an MAOP of 190 psig, consistent with the entire NCHP system. While there are no current capacity or pressure concerns on the system, Columbus has been a significant area of growth in Ohio, and the state continues to advocate for energy-dependent economic development projects in the central Ohio region. Testing the newly installed facilities to enable a 720 psig design pressure allows for useful additional reserve capacity to empower future flexibility without the need to replace and/or interrupt and retest the NCHP system in the future.

**(d) Control buildings.**

Adm.Code 4906-4-05(A)(3)(d) does not apply to this Project.

**(e) Heaters, odorizers, and above-ground facilities.**

No permanent odorization is currently anticipated for the Project. However, temporary odorization to support pickling of the new pipeline system may be required.

Above ground facilities will include pipeline markers and test stations along the pipeline.

**(f) Any other major equipment.**

No other major equipment is required.

**(B) Additional examples of relevant information requirements for electric generation facilities include:**

- (1) A description of how the facility will be connected to the regional electric grid.**
- (2) Information on interconnection of the facility to the regional electric power grid, including:**
  - (a) Information relating to their generation interconnection request, including interconnection queue name, number, date, and website.**
  - (b) System studies on their generation interconnection request, including, but not limited to, the feasibility study and system impact study.**

Adm.Code 4906-4-05(B) does not apply to this Project.

**4906-4-06**

**ECONOMIC IMPACT AND PUBLIC INTERACTION**

#### 4906-4-06 – Economic Impact and Public Interaction

- (A) The applicant shall state the current and proposed ownership status of the proposed facility, including leased and purchased land, rights-of-way, structures, and equipment.**

Columbia will construct, own, operate, and maintain the proposed pipeline and appurtenances. The majority of the proposed Project route is within public ROW and Columbia is working with jurisdictional authorities. For the portion of the Project within private rights, Columbia has been in contact with property owners to begin negotiating and acquiring easements for the centerline. A list of landowners is included in Appendix C.

One property will be leased to serve as laydown site.

- (B) The applicant shall provide information regarding construction costs. Examples of relevant construction cost information include:**

- (1) Estimates of applicable capital and intangible costs for the facility and various applicable alternatives that is classified according to federal energy regulatory commission uniform system of accounts prescribed by the public utilities commission of Ohio for utility companies, unless the applicant is not an electric light company, a gas company or a natural gas company as defined in Chapter 4905 of the Revised Code (in which case, capital and intangible costs classified in the accounting format ordinarily used by the applicant in its normal course of business). Examples of relevant cost estimates include:**

- (a) Land and land rights.**

Columbia has budgeted [REDACTED] for land acquisition. This estimate is prior to all land rights being acquired.

- (b) Structures and improvements.**

Pipeline markers and test stations costs are included in Columbia's response to the rule requirement of Adm.Code 4906-4-06(B)(1)(i).

**(c) Substation equipment.**

Adm.Code 4906-4-06(B)(1)(c) does not apply to this Project.

**(d) Poles and fixtures.**

Adm.Code 4906-4-06(B)(1)(d) does not apply to this Project.

**(e) Towers and fixtures.**

Adm.Code 4906-4-06(B)(1)(e) does not apply to this Project.

**(f) Overhead conductors.**

Adm.Code 4906-4-06(B)(1)(f) does not apply to this Project.

**(g) Underground conductors and insulation.**

Adm.Code 4906-4-06(B)(1)(g) does not apply to this Project.

**(h) Underground-to-overhead conversion equipment.**

Adm.Code 4906-4-06(B)(1)(h) does not apply to this Project.

**(i) Pipes.**

The estimated cost of 20-inch and 12-inch pipes, including engineering and design, materials, and installation, is [REDACTED].

**(j) Valves, meters, boosters, regulators, tanks, and other equipment.**

Adm.Code 4906-4-06(B)(1)(j) does not apply to this Project.

**(k) Right-of-way clearing and roads, trails, or other access.**

The estimated cost for clearing and access is [REDACTED].

**(1) Any other material cost items.**

Adm.Code 4906-4-06(B)(1)(l) does not apply to this Project.

The total Project cost is approximately [REDACTED].

**(2) A comparison of the total costs (per kilowatt for generation facilities or per mile for electric power transmission lines and gas pipelines) with the applicant's similar facilities, and explain any substantial differences.**

Total planned Project cost per mile of the Project is estimated to be [REDACTED] million per mile. This compares to three previously completed phases of the NCHP Project:

- West-Central NCHP Project Phase 2A - \$26.5M/mi
- Agler Road NCHP Project Phase 3B.1 – \$26.3M/mi
- Central Columbus NCHP Project Phase 1B - \$22.8M/mi

**(3) A tabulation of the present worth and annualized cost for capital costs and any additional cost details as required to compare capital cost of alternates (using the start of construction date as reference date), and describe techniques and all factors used in calculating present worth and annualized costs.**

As all capital costs are budgeted to be spent in 2026 and 2027, the estimates are equal to the present worth.

**(C) The applicant shall provide information regarding operation and maintenance expenses. Examples of information relevant to these expenses include:**

- (1) Applicable estimated annual operation and maintenance expenses for the first two years of commercial operation that is classified according to federal energy regulatory commission uniform system of accounts prescribed by the public utilities commission of Ohio for utility companies, unless the applicant is not an electric light company, a gas company or a natural gas company as defined in Chapter 4905 of the Revised Code (in which case the operation and**

**maintenance expenses classified in the accounting format ordinarily used by the applicant in its normal course of business).**

Columbia estimates that the annual O&M expenses for the Project will be approximately \$7,173.

- (2) A comparison of the total operation and maintenance cost (per kilowatt for generation facilities or per mile for electric power transmission lines and gas pipelines) with applicant's similar facilities and explain any substantial differences.**

Columbia estimates that the current annual O&M expenses from the existing pipeline are approximately \$1,328/mile compared with the estimated annual O&M expenditures for the Project of approximately \$1,067/mile.

- (3) A tabulation of the present worth and annualized expenditures for operating and maintenance costs as well as any additional cost breakdowns as required to compare alternatives, and describe techniques and factors used in calculating present worth and annualized costs.**

Columbia estimates that the annual O&M expenses for the Project will be approximately \$7,173. Columbia estimates that the current annual O&M expenses from the existing pipeline are approximately \$1,328/mile compared with the estimated annual O&M expenditures for the Project of approximately \$1,067/mile. Columbia calculated these estimates by utilizing current O&M costs for patrols, leak surveys, corrosion test stations, and critical valve inspections which were applied to the new pipe that is being installed through this Project.

- (D)The applicant shall provide information regarding the economic impact of the project. Examples of relevant economic impact information include:**

- (1) An estimate of the annual total and present worth of construction and operation payroll.**

Columbia anticipates an estimated construction payroll of approximately [REDACTED] over the construction period, which is anticipated to last approximately one year. In addition, spillover from this payroll into the broader

local economy, while not specifically calculated, is expected to be strong as income is spent locally on nondiscretionary and discretionary expenses that will support nearby commercial businesses and employment therewithin. Because this Project replaces existing infrastructure, Columbia does not anticipate any incremental operational payroll as a result of the Project.

**(2) An estimate of the construction and operation employment and estimate the number that will be employed from the region.**

Columbia estimates ■■■ full-time equivalent direct jobs (approximately ■■■ labor hours) to be supported over the construction period. While contractors have not been selected to perform the Project, Columbia expects that approximately 65% of the construction labor will be employed from the region. The ongoing operations labor will continue to be employed from the region.

**(3) An estimate of the increase in county, township, and municipal tax revenue accruing from the facility.**

Columbia estimates local (City of Columbus) and state income taxes generated by construction employment will result in a one-time tax revenue addition of \$1,130,693. Additionally, newly-installed pipeline is estimated to generate public utility personal property tax revenues of approximately \$60.80 million over the 30-year period after which it is installed and assessed fully. Of the increased property tax revenues over a 30-year period, below is an estimate of the distribution of taxes by levy type based on current tax rates:

- Franklin County: \$10.63 million
- City of Columbus: \$1.60 million
- Sharon Township: \$0.30 million
- Perry Township: \$0.08 million
- Columbus City Schools: \$45.78 million
- Columbus Metropolitan Libraries: \$2.24 million
- Columbus State Community College: \$0.17 million

**(4) An estimate of the economic impact of the proposed facility on local commercial and industrial activities.**

Among commercial and industrial enterprises with five or more employees in the broader NCHP impact area, estimated annual revenue is \$30.4 billion. Additionally, an estimated 248,294 jobs are associated with the estimated 9,366 businesses with five or more employees in this area. As stated previously, while this Project physically takes place in a limited geographic area of northern Columbus, the broader NCHP system relies on this Project to flow natural gas at appropriate capacities and pressures to commercial and industrial customers throughout northern Franklin County.

The revenue and employment of these businesses represented above cannot be attributed solely to Columbia Gas distribution infrastructure; however, given the criticality of natural gas to many commercial and industrial enterprises for process and space heating, these figures demonstrate the totality of the area's continued impact on Franklin County's economy.

**(E) The applicant shall provide information regarding public interaction. Examples of relevant public interaction information include:**

- (1) A description of the applicant's program for public interaction during the siting, construction, and operation of the proposed facility in the area in which any portion of such facility is to be located, including detailed information regarding the applicant's public information and complaint resolution programs as well as how the applicant will notify affected property owners and residents about these programs at least seven days prior to the start of construction.**

Columbia has developed a multi-pronged public engagement plan to inform the affected property owners and residents and adjacent properties (collectively, the "Project Stakeholders") of the Project. Columbia has taken several pre-application steps to communicate with the public about the Project. Initially, Columbia established a website (<https://www.columbiagasohio.com/our-company/about-us/regulatory-information/woodward-park-nchp-project>) to provide the public with information and frequently asked questions about the Project. Columbia has

a dedicated public affairs project specialist who will directly manage customer outreach for the Project, including managing an established phone line (800-242-6227) and email address (NCHP@nisource.com) to address specific customer questions and concerns about the Project. Columbia intends to maintain this website to communicate with customers during the siting and construction of the Project.

Columbia provided notice of the Project-to-Project Stakeholders through mailed notices and newspaper advertisements inviting Project Stakeholders to a series of public informational meetings. Notice for the October public informational meeting was mailed on September 9, 2025, and included information about the Project as well as an invitation to attend the public informational meeting held on October 1, 2025. Notice for the first 2026 public informational meeting was mailed on March 17 and March 18, 2026, and the meeting was held on April 8, 2026. A second 2026 public informational meeting was held on May 7, 2026, with notice for that meeting distributed on April 9 and 10, 2026. The dates are summarized in Table 5 below.

During each of the PIMs, Columbia solicited written comments from attendees via a feedback form on the public informational meeting and via an interactive map where attendees could leave comments on the map. Additional information on feedback received during these meetings is included in the response to Adm.Code 4906-4-04(A)(5) and the written responses are included in Appendix E.

**Table 5: Summary of Public Notices and Informational Meetings**

<b>Outreach Method</b>	<b>Associated Meeting</b>	<b>Notice Distribution Date(s)</b>	<b>Meeting Date(s)</b>
<b>Mailed Notices</b>	October public informational meeting	September 9, 2025	October 1, 2025
<b>Newspaper Advertisements</b>	October public informational meeting	September 11, 2025	October 1, 2025
<b>Public Informational Meeting</b>	October public informational meeting		October 1, 2025
<b>Mailed Notices</b>	April public informational meeting	March 17 and 18, 2026	April 8, 2026

<b>Outreach Method</b>	<b>Associated Meeting</b>	<b>Notice Distribution Date(s)</b>	<b>Meeting Date(s)</b>
<b>Newspaper Advertisements</b>	April public informational meeting	March 24, 2026	April 8, 2026
<b>Public Informational Meeting</b>	April public informational meeting		April 8, 2026
<b>Mailed Notices</b>	May public informational meeting	April 9 and 10, 2026	May 7, 2026
<b>Newspaper Advertisements</b>	May public informational meeting	April 22, 2026	May 7, 2026
<b>Public Informational Meeting</b>	May public informational meeting		May 7, 2026

On Columbia’s Project website, Columbia posted a PDF of the proposed Project route and alternate route to Project Stakeholders and provided an interactive map. The interactive map allowed Project Stakeholders to zoom in and leave comments on their properties. During construction, Columbia will host monthly office hours to address community concerns. In addition to these avenues, Columbia is also utilizing its social media channels to reach out to customers.

Columbia plans to mail oversized postcards to Project Stakeholders at least 7 days in advance of Project construction. These postcards will include an overview of the nature of the Project, specific contact information of personnel who are familiar with the Project, the proposed Project schedule for construction and restoration activities, and a complaint resolution process. Columbia plans to include on the postcard a QR code and URL for Project Stakeholders to share compliments or complaints on the Project via a feedback form. The feedback form will contain information on the complaint resolution process.

Post construction, Columbia has a dedicated customer care and regulatory compliance team that addresses customer concerns submitted to Columbia. Columbia also has a dedicated social media that responds to customer concerns and comments on our Facebook and X (formerly Twitter) platforms.

- (2) A description of any insurance or other corporate programs for providing liability compensation for damages, if such should occur, to the public resulting from construction, operation, or decommissioning of the proposed facility.**

Columbia is self-insured and maintains excess liability and property damage insurance as well. Columbia provides liability compensation for damages, if such should occur, as a result of Columbia's negligence in construction or operation of the proposed facility.

- (3) An evaluation and description of the anticipated impact to roads and bridges associated with construction vehicles and equipment delivery, and any measures that will be taken to improve inadequate roads and repair roads and bridges to at least the condition present prior to the project.**

Pipelines will be installed using a combination of open-trenched and trenchless construction methods. In instances where pipelines will be installed in roadways using open-trenched construction, construction equipment will be limited to working within the limits of disturbance depicted in the included engineering drawings in Appendix D with equipment deliveries being made using flaggers to coordinate safe traffic conditions. After pipeline installation, all excavations will be padded, backfilled, and graded. Backfill and pavement will meet the specifications from the City of Columbus and excerpts of those requirements are included in Appendix B. Roads will be repaired in accordance with Section 250 of the Construction and Material Specifications and Pavement & Utility Cut Repair Standards of the City of Columbus Standard Drawing 1441 and other permit conditions. In instances where open-trenched pipeline installation must be temporarily paused, all excavations within roadways will be barricaded off or covered with steel plating to maintain public safety and flow of traffic. Pipelines installed using trenchless methods will be located in areas and at depths designed to minimize potential risk to existing bridges and roadways.

- (4) A list of all transportation permits required for construction and operation of the project, and describe any necessary coordination with appropriate authorities for temporary or permanent road closures, lane closures, road access**

**restrictions, and traffic control necessary for construction and operation of the proposed facility.**

The construction and operation of the Project will require an Ohio Department of Transportation (“ODOT”) Utility Permit and City of Columbus Excavation Permit. Maintenance of Traffic (“MOT”) plans will be generated for the entire Project, which will be refined after discussions with each jurisdiction to ensure the plans are in accordance with local and state traffic standards. Once Columbia receives the ODOT Utility Permit and the City of Columbus approval of the MOT, Columbia will file these permits in this docket.

- (5) Except as to electric power transmission lines and gas pipelines, applicant’s description of the plan for decommissioning the proposed facility, including a discussion of any financial arrangements designed to assure the requisite financial resources. For a jurisdictional wind or solar facility, applicant’s plan description should be consistent with sections 4906.21 to 4906.222 of the Revised Code and rule 4906-4-09 of the Administrative Code.**

Adm.Code 4906-4-06(E)(5) does not apply to this Project.

- (6) A list of counties, townships, villages, and cities within the project area.**

The Project area consists of Franklin County, City of Columbus, Perry Township, and Sharon Township.

- (7) A list of the public officials contacted regarding the application, including their office addresses, email addresses, and office telephone numbers.**

**Table 6: List of Public Officials and Contact Information**

<b>Public Official</b>	<b>Office Address</b>	<b>Email Address</b>	<b>Office Telephone Number</b>
<b>City of Columbus</b>			
Christopher L. Wyche	90 W. Broad Street Columbus, Ohio 43215	clgolterman@columbus.gov Legislative Aide	(614) 645-3091 Legislative Aide
Shannon G. Hardin	90 W. Broad Street Columbus, Ohio 43215	jnclinger@columbus.gov Legislative Aide	(614) 645-6354 Legislative Aide

<b>Public Official</b>	<b>Office Address</b>	<b>Email Address</b>	<b>Office Telephone Number</b>
Rob Dorans	90 W. Broad Street Columbus, Ohio 43215	radorans@columbus.gov	(614) 645-7994 Legislative Aide
Nicholas J. Bankston	90 W. Broad Street Columbus, Ohio 43215	jpgdorval@columbus.gov Legislative Aide	(614) 645-2898 Legislative Aide
Lourdes Barroso de Padilla	90 W. Broad Street Columbus, Ohio 43215	jjcaceres@columbus.gov Legislative Aide	(614) 645-7032 Legislative Aide
Nancy Day-Achauer	90 W. Broad Street Columbus, Ohio 43215	jadilley@columbus.gov Legislative Aide	(614) 645-5292 Legislative Aide
Melissa Green	90 W. Broad Street Columbus, Ohio 43215	hegerken@columbus.gov Legislative Aide	(614) 645-0076 Legislative Aide
Emmanuel V. Remy	90 W. Broad Street Columbus, Ohio 43215	pdmejia@columbus.gov Legislative Aide	(614) 645-7565 Legislative Aide
Tiara N. Ross	90 W. Broad Street Columbus, Ohio 43215	mdwiley@columbus.gov Legislative Aide	(614) 645-6546 Legislative Aide
Hon. Andrew J. Ginther	90 W. Broad Street Columbus, Ohio 43215	officeofthemayor@columbus.gov Mayor's Office	(614) 645-7671 Mayor's Office
Scott Messer	111 North Front Street, 1 <sup>st</sup> Floor, Columbus, Ohio 43215	SSMesser@columbus.gov	(614) 645-7776
Kelly Scocco	111 North Front Street, 1 <sup>st</sup> Floor, Columbus, Ohio 43215	kbscocco@columbus.gov Public Service Department	(614) 645-3111 Public Service Dept.
<b>Franklin County</b>			
John O'Grady	373 S. High Street Columbus, Ohio 43215	AnnieRyznar@franklincountyohio.gov	(614) 525-5615 Policy Director
Kevin L. Boyce	373 S. High Street Columbus, Ohio 43215	chelsea.barnett@franklincountyohio.gov	(614) 525-6300 Policy Director
Erica C. Crawley	373 S. High Street Columbus, Ohio 43215	Dayla.Murphy@franklincountyohio.gov	(614) 525-3461 Policy Director
Adam W. Fowler	970 Dublin Road Columbus, Ohio 43215	fracoeng@franklincountyengineer.org	614-525-3030 Franklin County Engineer's Office
Kenneth N. Wilson	373 S. High Street Columbus, Ohio 43215	cmwallac@franklincountyohio.gov	(614) 525-4132 Senior Executive Assistant

<b>Public Official</b>	<b>Office Address</b>	<b>Email Address</b>	<b>Office Telephone Number</b>
Jennifer Fish	1404 Goodale Boulevard, Suite 100 Columbus, Ohio 43212	jfish@franklinswcd.org	(614) 486-9613 Office
<b>Sharon Township</b>			
Laura Kunze	95 E Wilson Bridge Road, Worthington, OH 43085	lakunze@sharontwp.us	(614) 885-5115 x3
John Oberle	95 E Wilson Bridge Road, Worthington, OH 43085	joberle@sharontwp.us	(614) 885-5115 x5
Michael Farley	95 E Wilson Bridge Road, Worthington, OH 43085	mdfarley@sharontwp.us	(614) 885-5115 x4
<b>Perry Township</b>			
James Roper	7125 Sawmill Road Dublin, OH 43016	Jroper@perrytwp.org	(614) 889-2669
Andy English	7125 Sawmill Road Dublin, OH 43016	aenglish@perrytwp.org	(614) 889-2669
Chet J. Chaney	7125 Sawmill Road Dublin, OH 43016	cchaney@perrytwp.org	(614) 889-2669

- (8) For an electric generation facility that applies for a certificate after the effective date of the adoption of this chapter, the following requirements apply.**
- (a) The applicant shall file a copy of the final complaint resolution plan on the public docket.**
  - (b) At least seven days prior to the start of construction and at least seven days prior to the start of facility operations, the applicant shall notify via mail affected property owners and residents, including those individuals who were provided notice of the public informational meeting, residences located within one mile of the project area, parties to this case, county commissioners, township trustees, emergency responders, airports, schools, and libraries, as well as anyone who has requested updates regarding the project. These notices shall provide information about the project, including contact information and a copy of the complaint resolution plan.**

- (c) The start of construction notice shall include written confirmation that the applicant has complied with all preconstruction-related conditions of the certificate, as well as a timeline for construction and restoration activities.**
- (d) The start of facility operations notice shall include written confirmation that the applicant has complied with all construction-related conditions of the certificate, as well as a timeline for the start of operations.**
- (e) During the construction and operation of the facility, the applicant shall submit to staff a complaint summary report by the fifteenth day of January and July of each year through the first five years of operation. The report shall include a list of all complaints received through the applicant's complaint resolution process, a description of the actions taken toward the resolution of each complaint, and a status update if the complaint has yet to be resolved, though the name and other personal identifying information can be redacted at the request of any complainant.**
- (f) The applicant shall file a copy of all preconstruction notices and complaint summaries on the public docket.**

Adm.Code 4906-4-06(E)(8) does not apply to this Project.

**4906-4-07**

**COMPLIANCE WITH AIR, WATER, SOLID WASTE, AND  
AVIATION REGULATIONS**

#### 4906-4-07 – Compliance with Air, Water, Solid Waste, and Aviation Regulations

**(A) The information requested in this rule is used to determine whether the facility will comply with regulations for air and water pollution, solid and hazardous wastes, and aviation. Where appropriate, the applicant may substitute all or portions of documents filed to meet federal, state, or local regulations. Existing data may be substituted for physical measurements.**

Columbia will comply with federal, state, and local requirements for air, water, solid waste and aviation regulations as applicable to the Project.

**(B) The applicant shall provide information on compliance with air quality regulations. Examples of information relevant to this determination include:**

**(1) Information regarding preconstruction air quality and permits, including:**

**(a) Available information concerning the ambient air quality of the proposed project area and any proposed alternative project area(s).**

The Environmental Protection Agency (“EPA”) has set National Ambient Air Quality Standards (“NAAQS”) in an effort to regulate air pollutants that could negatively impact the health of citizens or the environment. For six pollutants that were deemed harmful, a maximum concentration and safety margin were set. These six pollutants are carbon monoxide, lead, nitrogen oxide (“NO”), ozone, particulate matter (“PM”), and sulfur dioxide (“SO<sub>2</sub>”).

Regional areas are measured daily to assess their meeting of the NAAQS. If an area exceeds the maximum concentration for one of the pollutants, it is categorized as a nonattainment area. If an area meets or is below the maximum concentration, it is categorized as an attainment area. If a nonattainment area begins to meet or fall below the maximum concentration threshold, it is considered a maintenance area.

The Project is in Franklin County, Ohio and within the boundary of Columbus, Ohio. Franklin County, Ohio is not listed as a nonattainment region for any of

the tracked pollutants.<sup>5</sup> The Project, a pipeline, does not require air permitting for either construction or operation. Since air quality permits are not required, the data requirements of this section do not apply to the Project.

- (b) A description of the air pollution control equipment for the proposed facility. Stack gas parameters including temperature and all air pollutants regulated by the federal or state environmental protection agency as described for each proposed fuel. These parameters apply to each electric power generation unit proposed for the facility. Include tabulations of expected efficiency, power consumption, and operating costs for supplies and maintenance. Describe the reliability of the equipment and the reduction in efficiency for partial failure.**

Air pollution control equipment is not required for the construction or the operation of the Project.

- (c) A description of applicable federal and/or Ohio new source performance standards (NSPS), applicable air quality limitations, applicable national ambient air quality standards (NAAQS), and applicable prevention of significant deterioration (PSD) increments.**

There are no applicable federal or state NSPS, air quality limitations, NAAQS, or prevention of significant deterioration (“PSD”) increments to the Project.

- (d) A list of all required permits to install and operate air pollution sources. If any such permit(s) have been issued more than thirty days prior to the submittal of the certificate application, list of all special conditions or concerns attached to the permit(s).**

No air permits will be required for the Project.

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<sup>5</sup> EPA. 2026. Nonattainment Areas for Criteria Pollutants. Accessed online: <https://www.epa.gov/green-book>

**(e) Except for wind farms and solar facilities, a map of at least 1:100,000 scale containing:**

- i. The location and elevation (ground and sea level) of Ohio environmental protection agency primary and secondary air monitoring stations or mobile vans which supplied data used by the applicant in assessing air pollution potential.**
- ii. The location of major present and anticipated air pollution point sources.**

No permitted sources will be created due to this Project and therefore a map is not applicable.

**(f) A description of how the proposed facility will achieve compliance with the requirements identified in paragraphs (B)(1)(c) and (B)(1)(d) of this rule.**

No air permits are required for this Project, and therefore there are no applicable requirements identified in paragraphs (B)(1)(c) and (B)(1)(d) of this rule.

**(2) A description of plans to control emissions and fugitive dust during the site clearing and construction phase.**

During the construction phase of the Project, air emissions may be elevated within the vicinity due to vehicular traffic of personnel and construction equipment. Construction equipment and personnel vehicles emit carbon dioxide, NO, particulates, volatile organic compounds (“VOC”), sulfur dioxide, and hazardous air pollutants. The estimated amount of emissions released during construction is expected to be negligible due to the Project’s short construction timeline and limited scale. Additionally, this Project is occurring alongside active roadsides, where vehicles that produce emissions are also occurring, limiting the increased exposure to areas with existing emissions.

Vehicles and construction equipment will be regularly maintained for proper functionality and reduce unexpected emissions. The emissions present during construction are not expected to significantly impact the air quality in the area.

Construction activities will also potentially increase the amount of dust within the air due to exposure of soil and increased vehicular traffic in the area. To address this, the Project will use Best Management Practices (“BMPs”) within the industry to reduce the amount of dust created, such as using water to help suppress the dust. Additionally, vegetated areas that are disturbed during construction will be revegetated following construction to reduce exposed soil. Due to the Project following industry BMPs the amount of dust expected should not impact the air quality, and any increase in dust or emissions will be temporary, limited, and not likely to adversely impact the area.

**(3) Except for wind farms and solar facilities, information regarding air quality for the operation of the proposed facility, including:**

No air permitting is expected for this Project.

**(a) A description of ambient air quality monitoring plans for air pollutants regulated by the federal or state environmental protection agency.**

Because no air permit is required for the Project, no ambient air quality monitoring plans will be required.

**(b) A map of at least 1:24,000 scale, show three isopleths of estimated concentrations that would be in excess of the U.S. environmental protection agency-defined “significant emission rates” when the facility is operating at its maximum rated output. The intervals between the isopleths should depict the concentrations within a five-mile radius of the proposed facility. A screening analysis may be used to estimate the concentrations.**

Emissions above “significant emission rates” are not expected therefore a map is not applicable.

**(c) A description of procedures to be followed in the event of failure of air pollution control equipment, including consideration of the probability of occurrence, expected duration and resultant emissions.**

The Project will not have air pollution control equipment.

**(C) The applicant shall provide information on compliance with water quality regulations. Examples of relevant information include:**

**(1) Information regarding preconstruction water quality and permits.**

A wetland delineation was conducted in the field along the proposed Project route. Additional details on the studies and results are included in Adm.Code 4906-4-08.

**(a) A list of all permits required to install and operate the facility, including water pollution control equipment and treatment processes.**

Relating to water quality permits, the Project is anticipated to require a Section 10 Permit and Section 404 Nationwide Permit 12 from U.S. Army Corps of Engineers, National Pollutant Discharge Elimination System ("NPDES") Ohio Environmental Protection Agency ("OEPA") General Construction Permit (OHC000006), a Hydrostatic Test Water General Permit, and Stormwater Pollution Prevention Plan ("SWPPP") review permits from both the City of Columbus and Franklin County, Ohio.

**(b) A map of at least 1:24,000 scale, show the location and sampling depths of all water monitoring and gauging stations used in collecting preconstruction survey data, including samples collected by standard sampling techniques and only in bodies of water likely to be affected by the proposed facility. Information from U.S. geological survey (USGS), Ohio environmental protection agency, and similar agencies may be used where available, provided that the applicant identifies all such sources of data.**

Based on the Project being a gas pipeline project, water monitoring and gauging stations are not anticipated to be needed for the construction of the Project.

**(c) A description of the ownership, equipment, capability, and sampling and reporting procedures of each station.**

Based on the Project being a gas pipeline project, water monitoring and gauging stations are not anticipated to be needed for the construction of the Project.

**(d) A description of the existing water quality of the receiving stream based on at least one year of monitoring data, using appropriate Ohio environmental protection agency reporting requirements.**

The Project should not introduce an increase in water pollution to the surrounding areas. Preconstruction water quality was assessed through publicly accessible information online.

The Project crosses one named water body, the Olentangy River. The Olentangy River is categorized as an artificial path by the USGS with an annual mean flow of 493 cfs and a velocity of 1.51 f/s.

Utilizing the Environmental Protection Agency's ("EPA") How's My Waterway? Tool, information on the water quality within the Olentangy River is accessible. The river is considered impaired by the EPA for aquatic life and swimming and boating. This impairment is indicated by a high amount of *Escherichia coli* (E. coli), caused by human or animal waste, and pollutants from urban stormwater.<sup>6</sup> These impairments were detected in 2024 and have led to an urging to not swim within the Olentangy River.

The watershed surrounding the Olentangy River, labeled Mouth Olentangy River by the EPA, is also considered impaired for aquatic life, although it is good for shellfish and fish consumption, and unknown for swimming and boating. The watershed has tested high for both sedimentation/siltation and found a flow regime modification in 2018, leading to its impaired status.<sup>6</sup>

Within the Mouth Olentangy River area, there are four companies with permits to discharge into the watershed. Two of these companies have violations identified, including one with a Category I Noncompliance, considered a more severe issue.<sup>6</sup>

The preconstruction water quality is impaired and does not represent prime water quality or stream habitat. The Project does not anticipate to negatively impact the water quality from its preconstruction status due to a lack of direct

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<sup>6</sup> U.S. Geological Survey. 2026. How's My Waterway? Accessed online: <https://mywaterway.epa.gov/>

discharging into the watershed, use of SWPPPs, and the waters already impaired nature.

- (e) Available data necessary for completion of any application required for a water discharge permit from any state or federal agency for this project, including comparable information provided for the proposed site and any proposed alternative site(s).**

If a hydrostatic test permit is required, the permit application will include detailed information on the proposed discharge plan. Columbia and its designated contractor will collaborate with the governing agency to evaluate all water disposal options. This will determine whether discharges can be managed appropriately on-site or if the water must be collected and transported for disposal at an approved off-site facility.

**(2) Information regarding water quality during construction.**

- (a) A map of at least 1:24,000, that indicates the location of the water monitoring and gauging stations to be utilized during construction.**

Based on the Project being a gas pipeline project, water monitoring and gauging stations are not anticipated to be needed for the construction of the Project.

- (b) An estimate of the quality and quantity of aquatic discharges from the site clearing and construction operations, including runoff and siltation from dredging, filling, and construction of shoreside facilities.**

There are no direct aquatic discharges anticipated from site clearing and construction of the Project. The Project has been specifically designed to avoid impacts on water bodies by minimizing disturbance. The crossing of the Olentangy River is planned to be accomplished using HDD. This method is a trenchless construction method that installs the pipeline deep beneath the bed and banks of the water body, completely avoiding any in-stream work.

- (c) A description of any plans to mitigate the above effects in accordance with current federal and Ohio regulations.**

HDD methodology will be utilized to reduce the impact on the watershed in places where trenching will not be completed over a culvert. As the Project will not impact jurisdictional streams or wetlands, no mitigation is required at the state or federal level.

- (d) A description of any changes in flow patterns and erosion due to site clearing and grading operations.**

While minor temporary changes to overland water flow patterns may occur during grading activities, appropriate erosion and sediment control BMPs will be installed to prevent erosion.

- (e) A description of the equipment proposed for control of effluents discharged into bodies of water and receiving streams.**

No effluents discharged are anticipated as part of the Project into bodies of water and receiving streams, as such no equipment is required.

**(3) Information on water quality during operation of the facility.**

- (a) A map of at least 1:24,000 scale, that indicates the location of the water quality monitoring and gauging stations to be utilized during operation.**

No point source water discharge is anticipated for this Project during the operations of the facility. Therefore, monitoring and gauging stations are unnecessary and a map is not required.

- (b) A description of the water pollution control equipment and treatment processes planned for the proposed facility.**

The description of water pollution control equipment and treatment processes is not applicable, as there will not be equipment or a treatment process that would necessitate such controls for a gas pipeline project.

- (c) A description of the schedule for receipt of the national pollution discharge elimination system permit.**

An operational NPDES permit is not needed for the Project.

- (d) A quantitative flow diagram or description for water and water-borne wastes through the proposed facility, showing the following potential sources of pollution, including:**

- i. Sewage.**
- ii. Blow-down.**
- iii. Chemical and additive processing.**
- iv. Waste water processing.**
- v. Run-off and leachates from fuels and solid wastes.**
- vi. Oil/water separators.**
- vii. Run-off from soil and other surfaces.**

Water-borne wastes or water discharge is not expected in the Project; therefore, a flow diagram is not required.

- (e) A description of how the proposed facility incorporates maximum feasible water conservation practices considering available technology and the nature and economics of the various alternatives.**

The operation of a pipeline does not have an ongoing need for water; therefore, a water conservation strategy is not required.

- (D) The applicant shall provide information on compliance with solid waste regulations. Examples of relevant information include:**

- (1) Information regarding preconstruction solid waste.**

- (a) The nature and amount of debris and solid waste in the project area.**
- (b) Any plans to deal with such wastes.**

Vegetation clearing, including tree trimming, prior to construction will require debris removal from the Project area. Shrubs that are cleared will be removed and

disposed of by a contractor. General construction debris and waste removal will follow all federal, state, and local regulations.

**(2) Information regarding solid waste during construction.**

**(a) An estimate of the nature and amounts of debris and other solid waste generated during construction.**

**(b) The proposed method of storage and disposal of these wastes.**

Solid waste will be produced during the construction phase of the Project. Debris will likely include concrete and metal from current roadways, cardboard, plastic, and wood from supplies and equipment on site, erosional control devices after they have been used, and garbage from the crews working on site. Dumpsters will be on-site to collect waste and collection will occur regularly. Recyclable materials, to an extent practical, will be separated from the general waste and recycled.

Disposal of waste materials will follow all regulations laid out by local, state, or federal agencies, including the Ohio EPA. For all chemicals on-site, a product Safety Data Sheet ("SDS") will be used to determine appropriate disposal. Dumpsters on-site will be managed by a contractor who will empty regularly and remove the debris to a licensed facility. Dumpsters will be located throughout the Project site to ensure they are accessible to all workers.

**(3) Information regarding solid waste during operation of the facility.**

**(a) An estimate of the amount, nature, and composition of solid wastes generated during the operation of the proposed facility.**

**(b) Proposed methods for storage, treatment, transport, and disposal of these wastes.**

No solid waste is expected to occur as part of the operation of the pipeline Project. If solid waste is produced for any performed maintenance activities, it will be disposed of following all local, state, and federal laws.

**(4) Plans and activities leading toward acquisition of waste generation, storage, treatment, transportation and/or disposal permits. If any such permit(s) have**

**been issued more than thirty days prior to the submittal of the certificate application, a list of all special conditions or concerns attached to the permit(s).**

No disposal or treatment permits are anticipated for the Project. No waste is anticipated to be produced by the operation of the pipeline.

**(E) Information on compliance with environmental and aviation regulations. Examples of relevant information include:**

**(1) The height of the tallest anticipated installed, above ground structures.**

Pipeline markers and test stations will be less than 48 inches in height.

**(2) A list of all airports, heliports, landing strips, medical use heliports, and seaplane landing sites within six nautical miles of the project area or property within or adjacent to the project area, and show these facilities on a map(s) of at least 1:24,000 scale. For all structures located within the six nautical miles, an indication of the maximum possible height of construction equipment, and a list of air transportation facilities, existing or proposed, and copies of any correspondence with the federal aviation administration and the Ohio office of aviation. Additionally, confirmation that the owners of these facilities have been notified of the proposed facility and any impacts it will have on aviation operations.**

Within six nautical miles, approximately 6.90 miles on land, there are two airports and nine heliports. The airports, Ohio State University airport and John Glenn Columbus International Airport, are approximately 1.5 and 6.2 miles from the Project, respectively. Of the nine heliports, six are associated with hospitals and 3 are privately owned. The aforementioned heliports and airports are shown on Figure 8. The Project will not impact aviation within the area.

Correspondence with the FAA, Ohio office of Aviation, and airport/heliport owners are not required due to the Project being an underground natural gas pipeline and structures associated with the Project being four feet or less. Additionally, the maximum height of construction equipment is anticipated to not exceed 35 feet, which would not require Columbia to file notice with the FAA for

construction. Refer to Appendix F.3 for FAA pre-screening results for construction equipment.

- (3) A description of the FAA filing status of each structure and describe any potential conflicts with air navigation or air traffic communications that may be caused by the proposed facility.**

No FAA filing is required for the Project.

- (4) A description of whether the proposed facility or a specific structure that is part of the proposed facility has any 14 CFR part 77 impacts.**

There are no 14 CFR Part 77 impacts.

- (5) A list and brief discussion of all licenses, permits, and authorizations that will be required for construction of the facility.**

Table 7 lists the agencies Columbia may need authorizations or permits from, or that Columbia may consult with, for the construction of the Project.

**Table 7: Agencies, Type of Permit or Approval Necessary, and Miscellaneous Details Related to the Project, Franklin County, Ohio**

Agency	Permit/Approval Necessary
U.S. Army Corps of Engineers (“USACE”) – Section 404 (Nationwide Permit 12)	The Project will open cut stream channels and wetland areas; therefore, a Nationwide Permit (“NWP”) 12 is required for this Project. The USACE will require a 90–120-day review period of the Pre-Construction Notification (“PCN”) for coverage under NWP 12 permit. The permit will be secured by Columbia and/or any of their authorized agents.
Section 10 – Rivers and Harbors Act Permit	The Project will cross the Olentangy River in a location that is designated a Section 10 Navigable Water; therefore, a Section 10 Permit will be required. The USACE will require a 90–120-day review period, however, a Section 10 Permit can be submitted to the USACE concurrently with the PCN for a NWP. The permit will be secured by Columbia and/or any of their authorized agents.
USFWS	The Project has been reviewed by the USFWS to determine if the Project will have adverse effects on federally listed threatened and endangered species. Information on consultation is included in Appendix F.1.

Agency	Permit/Approval Necessary
OEPA – General Permit Authorization for Storm Water Discharge Associated with Construction Activity	Coverage under the General Permit for Storm Water Discharges Associated with Construction Activities under the National Pollutant Discharge Elimination System (OHC000006) will be required for this Project. The review time by OEPA for this permit is 21 days and will be secured by Columbia and/or any of their authorized agents.
OEPA – General Permit Authorization for Hydrostatic Test Water Discharge Associated with Construction Activity	A National Pollutant Discharge Elimination System general permit for hydrostatic test water discharge (OHH000004) may be required for this Project. If required, this will be obtained prior to discharge activities.
ODOT – Utility and Lane Closure Permits	A utility permit to cross under and work within ODOT ROW for all state routes within the Project. Including any requested lane closures. ODOT has 90 days to review the permit application and the permit will be secured by Columbia and/or any of their authorized agents.
ODNR	The Project has been reviewed by the ODNR to determine if the Project will have impacts on state listed threatened and endangered species. Information on consultation is included in Appendix F.1.
Franklin County Right of way	A right-of-way permit to cross under and work within the Franklin County road right-of-way. Franklin County has 30 days to review the permit application and the permit will be secured by Columbia and/or their authorized agents and will be provided to the contractor for use and enforcements prior to construction.
SWPPP Review – Franklin County	Project is located within Sharon Township and Franklin County handles reviews within this township. Engineer for Franklin County will require a SWPPP plan review. Anticipated review is 3 weeks.
SWPPP/CC Plan and Design Review and Approval – City of Columbus	Columbus will require a new SWPPP/CC Plan to be designed for any portion of the Project outside of Columbus ROW and reviewed separately from other plans. Portions inside ROW will be reviewed during excavation permitting process.
Right of Way and Excavation Permit – Perry Township	Any work within or excavation on Township roads. Anticipated review timeframe is two weeks.
City of Columbus Roadway permits	A roadway permit to cross under and work within the City of Columbus road right-of-way for all roads within the Project may be required for this Project. The City of Columbus has 90 days to review the permit application and the permit will be secured by Columbia and/or any of their authorized agents.
Railroad Permit	A railroad permit is anticipated from CSX and from Norfolk Southern for crossing the tracks.

- (6) A description, quantification and characterization of debris that will result from construction of the facility, and the plans for disposal of the debris.**

While construction work is ongoing, the construction work area will be kept clean of all rubbish and debris resulting from the work. All trash and construction debris will be stored in covered containers. Non-hazardous materials and waste shall be disposed of in an approved landfill and/or recycled at an appropriate facility.

- (7) Confirmation of the process that will be used to control storm water and minimize erosion during construction and restoration of soils, wetlands, and streams disturbed as a result of construction of the facility.**

The SWPPP will be developed following the OEPA General Permit Authorization for Storm Water Discharge Associated with Construction Activity (OHC000006).

- (8) Confirmation of plans for disposition of contaminated soil and hazardous materials generated from clearing of land, excavation or any other action that would adversely affect the natural environment of the project site during construction. This confirmation is in recognition of that responsibility for removal of contaminated soil is limited solely to soil and material from clearing of land, excavation, or any other action that would adversely affect the natural environment of the project site, and does not include additional remediation measures beyond the scope of the project.**

**Contaminated Soil:** Waste materials, including contaminated soil, will be properly stored and disposed of in accordance with local regulations.

**Hazardous Materials:** Hazardous materials will be managed and disposed of in accordance with Columbia policies and federal, state, and local regulations.

- (9) A description of the plans for construction during excessively dusty or excessively muddy soil conditions.**

**Dusty Soil:** Dust Control methods recommended by *ODNR Rainwater and Land Development* (ODNR Division of Soil and Water Conservation 2006) include maintaining vegetative cover and timely temporary and permanent seeding, mulching areas (not areas of construction traffic), leaving soil in a rough state, watering roads, and chemical stabilizers or wetting agents.

**Muddy Soils:** Rock construction entrances (as described in the *NiSource Environmental Construction Standards*) are needed to maintain safe vehicle operation and prevent tracking soil and mud onto public roads. These installations are designed to remove mud from vehicle tires and tracks before accessing the road. Access to the site should be limited to the stabilized construction entrance(s).

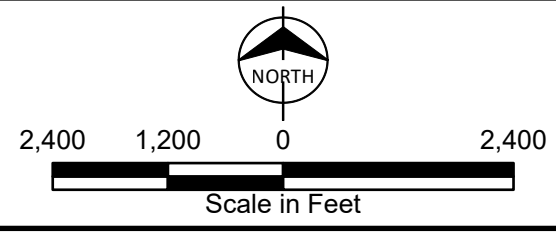
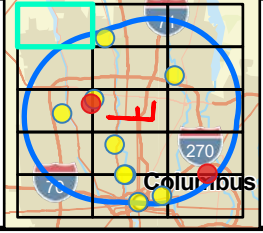
**FIGURE 8**

**Aviation Facilities Map**

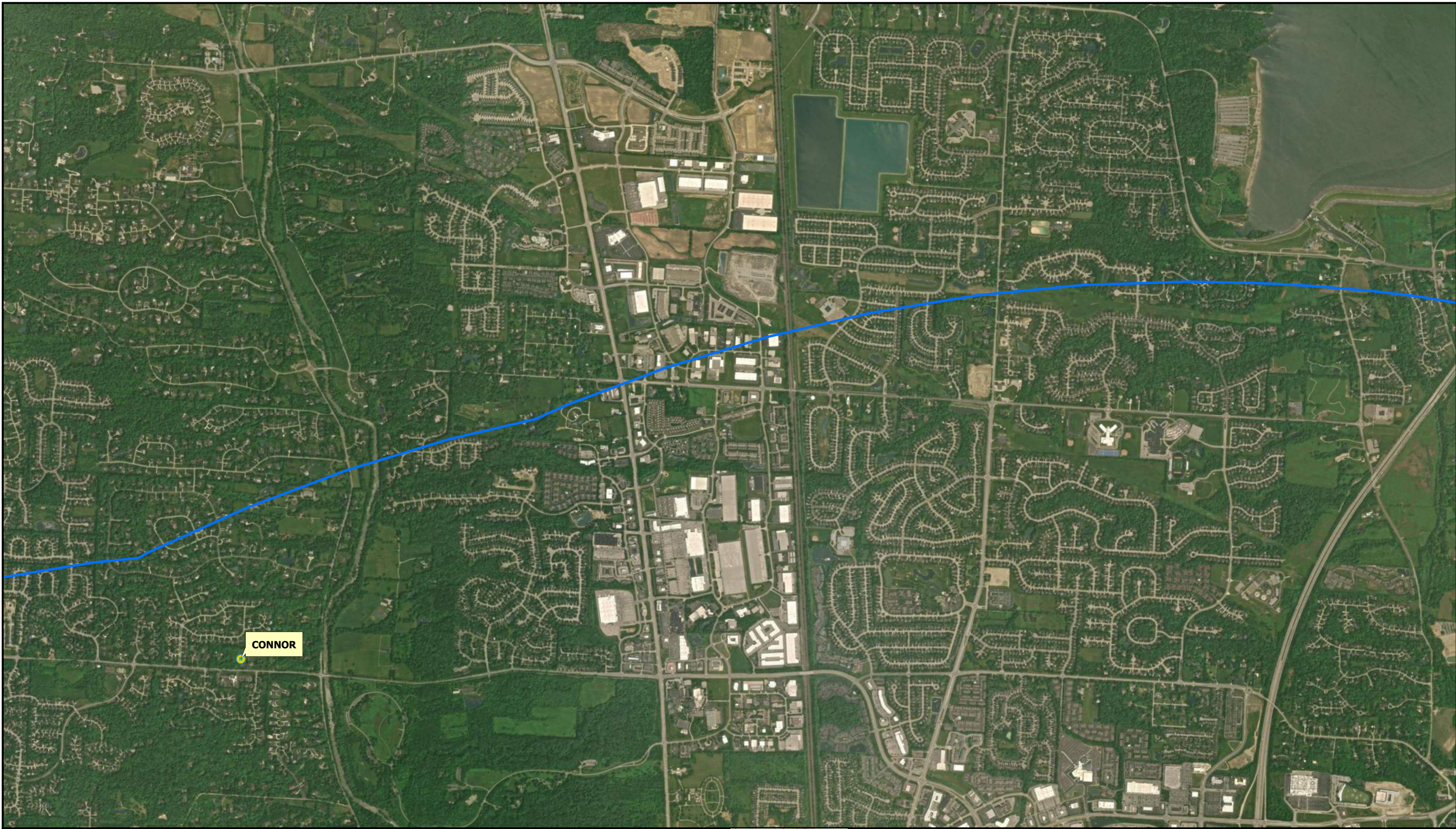


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- FAA-Registered Runways & Helipads

- Aviation Facilities
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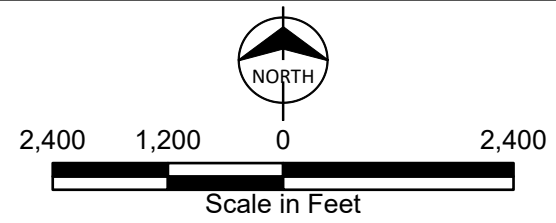
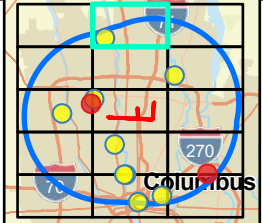


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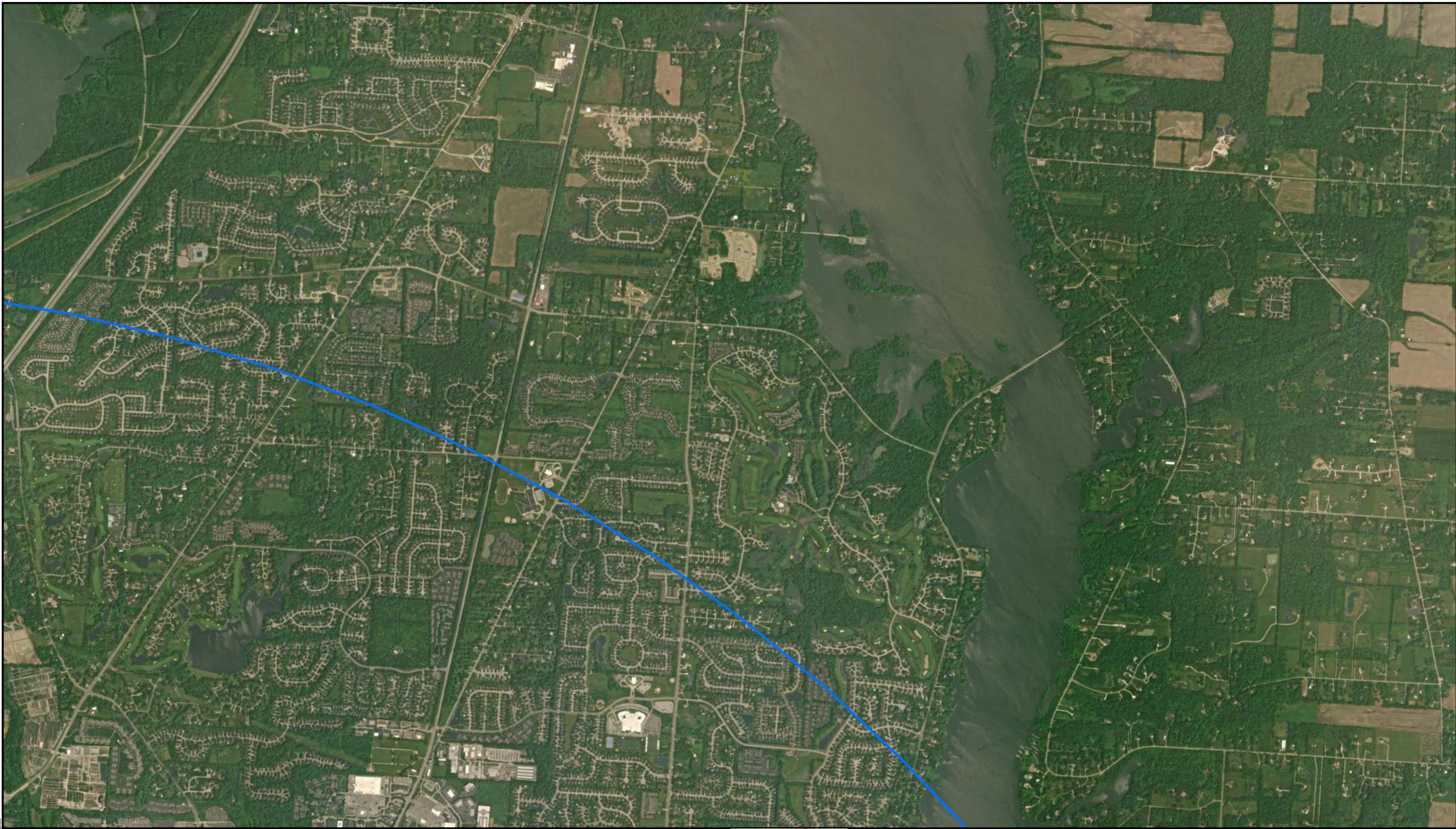


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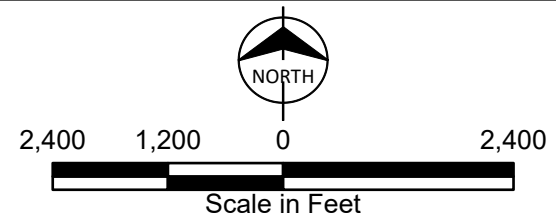
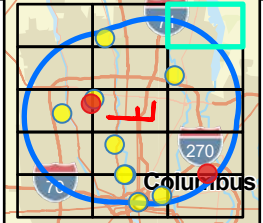


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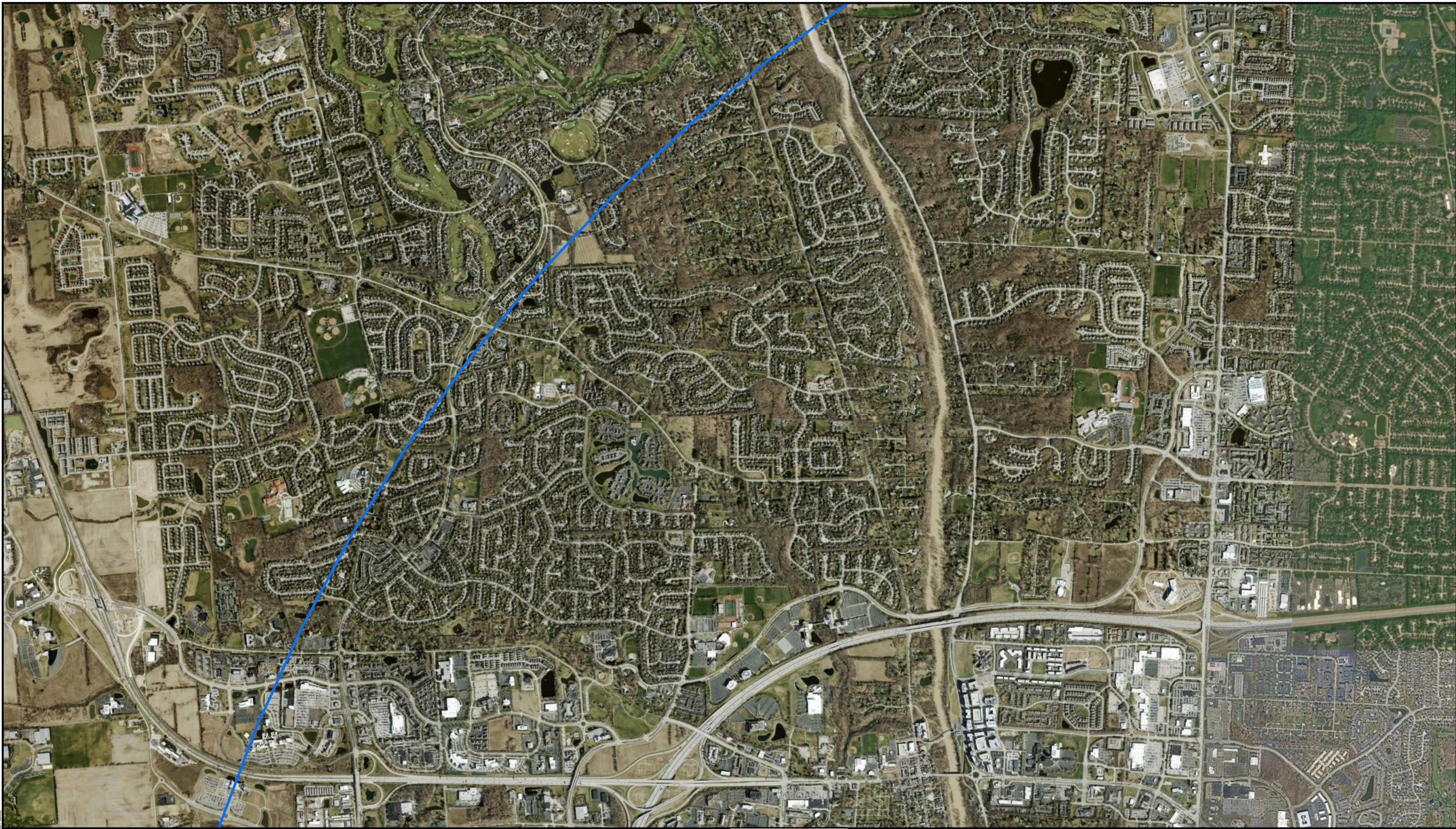


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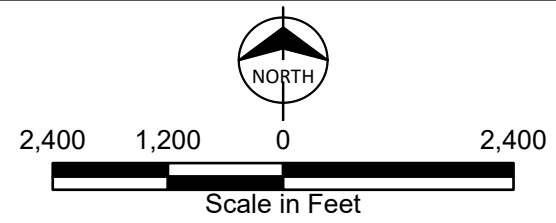
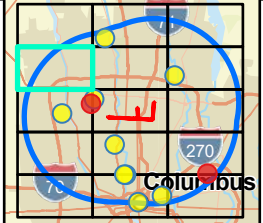


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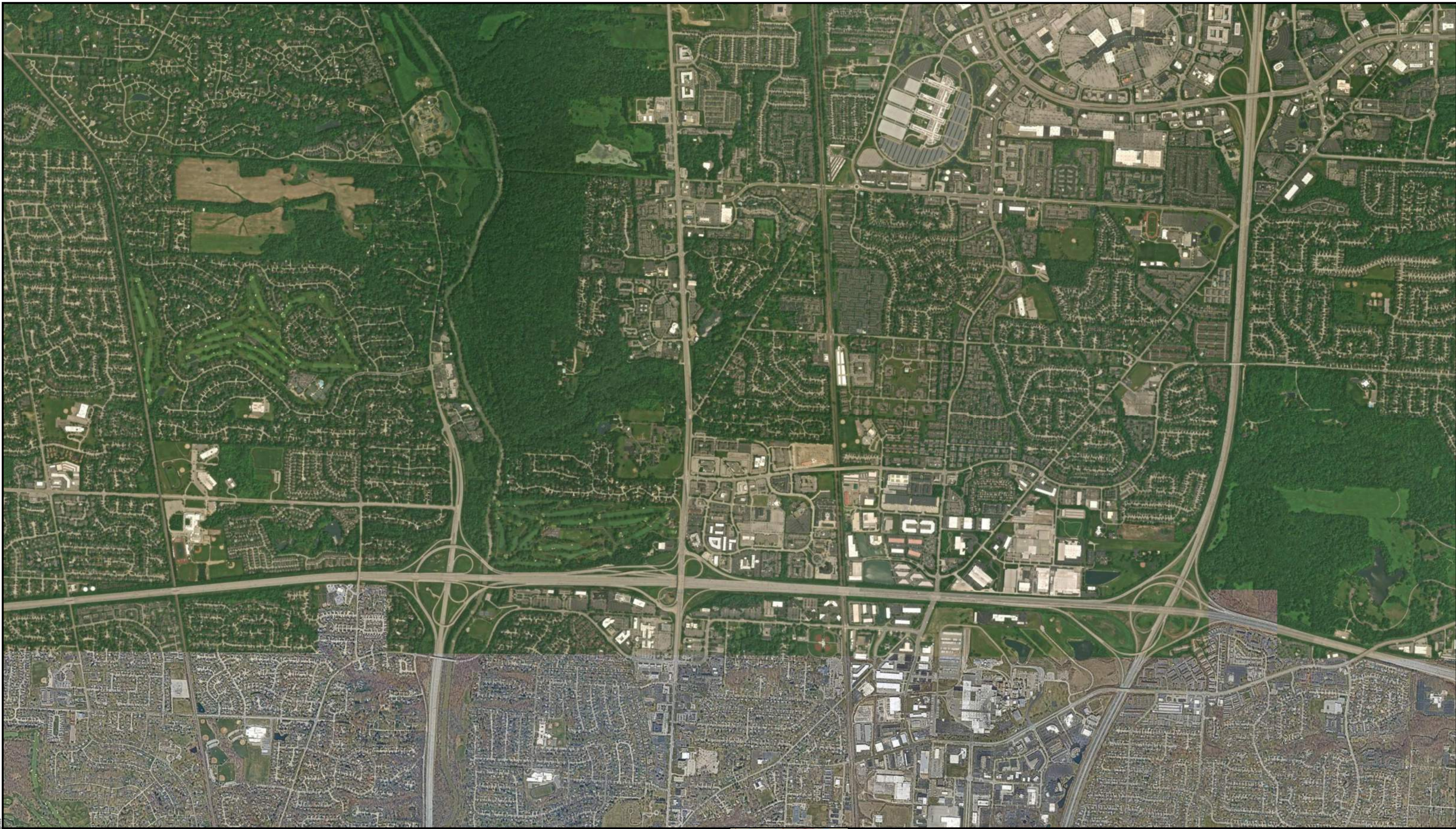


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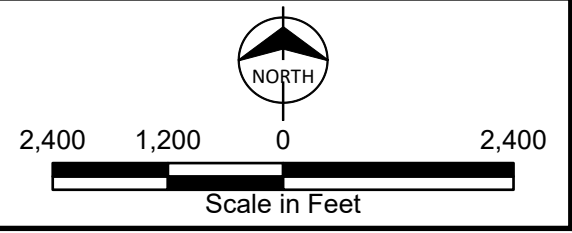
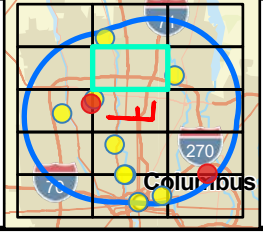


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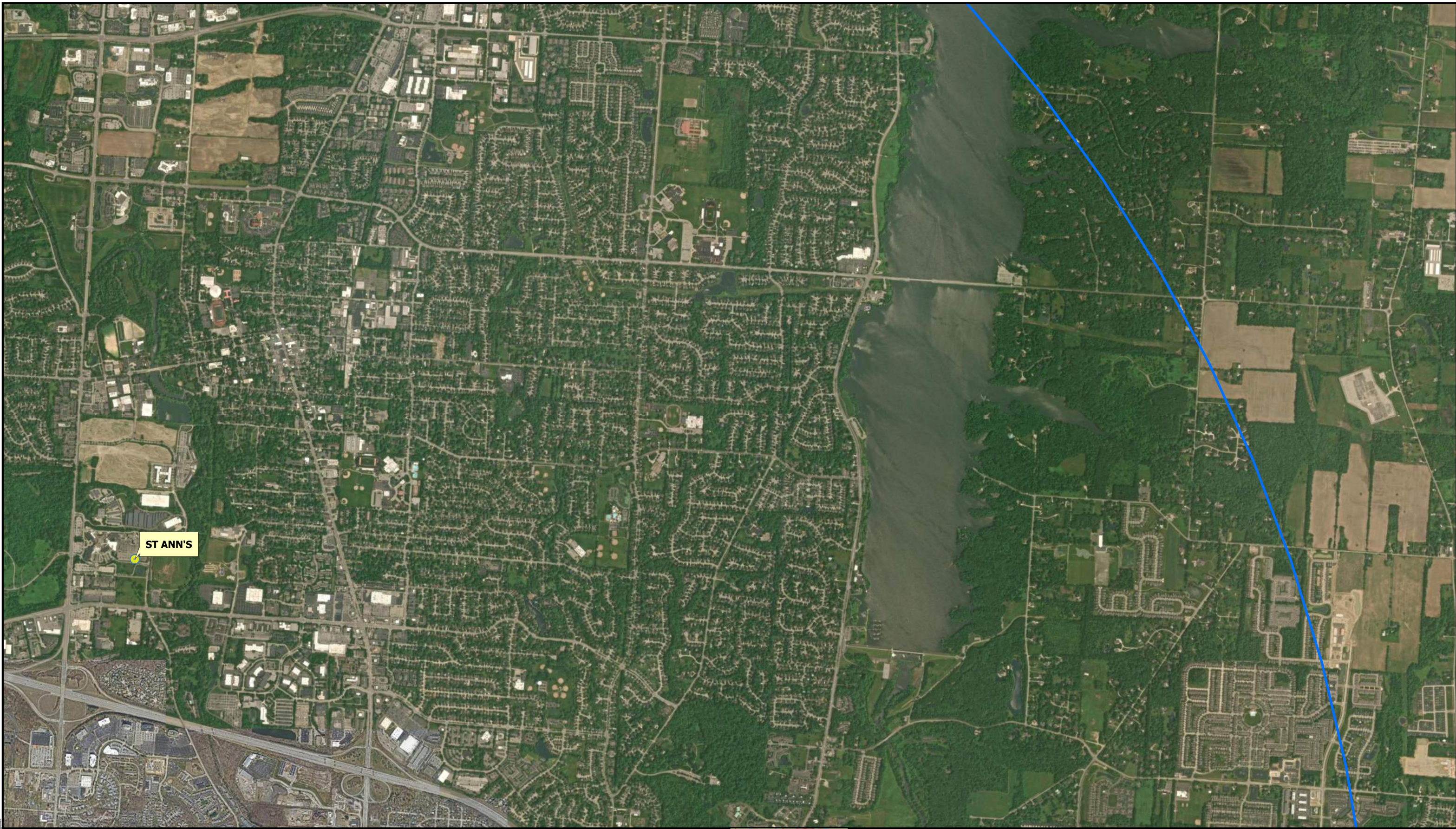


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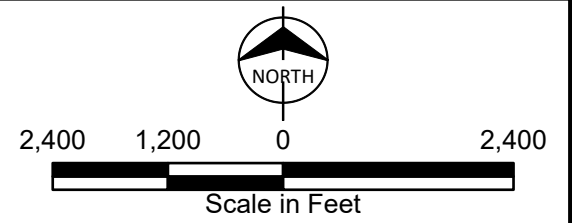
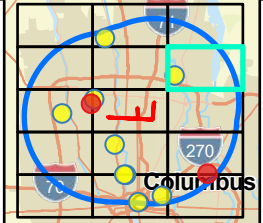


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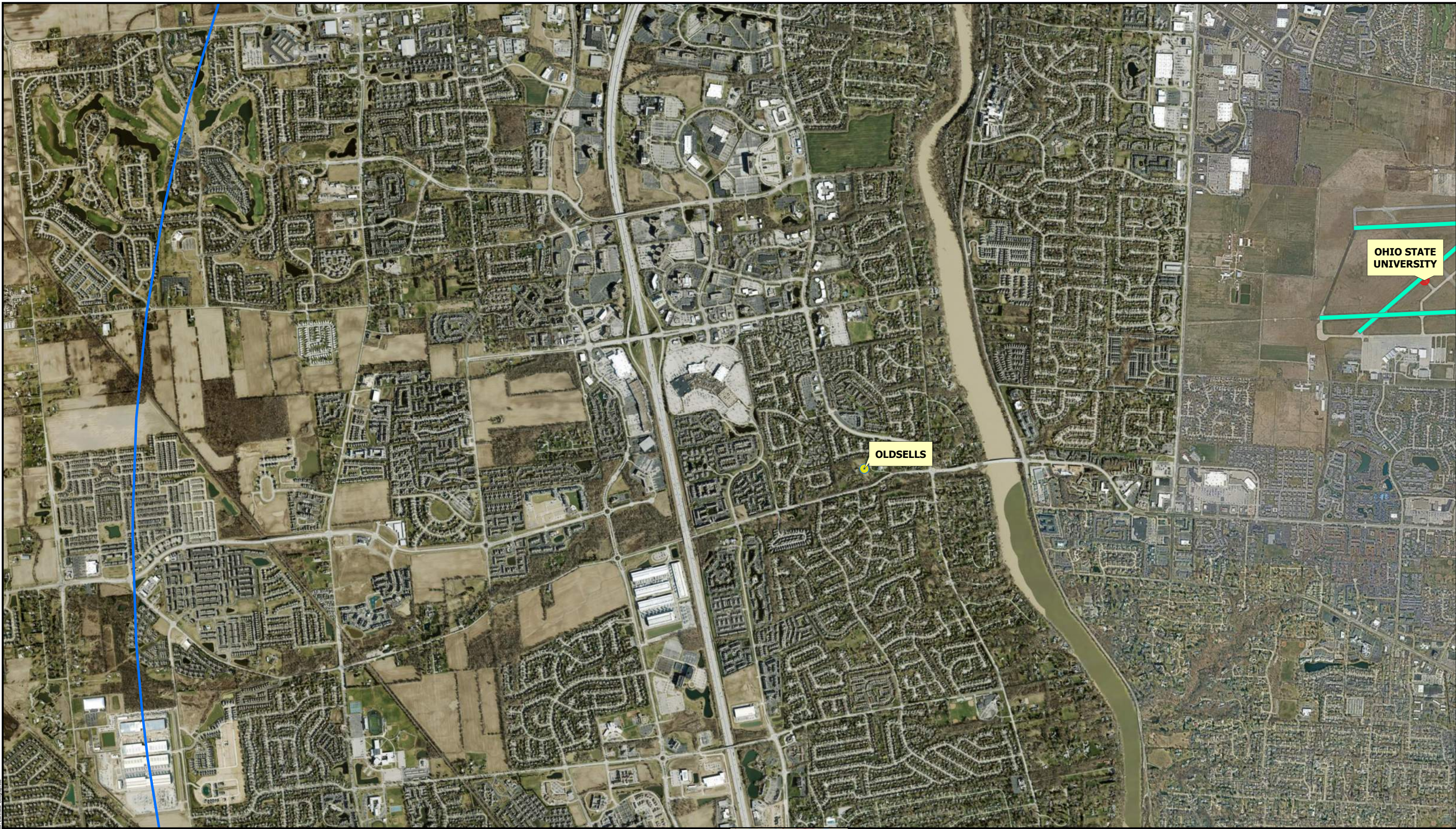


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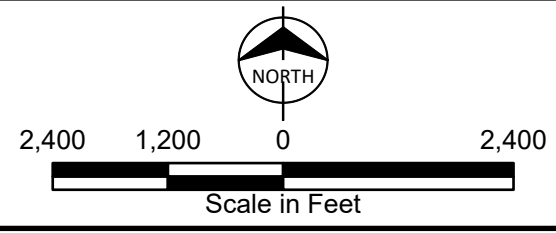
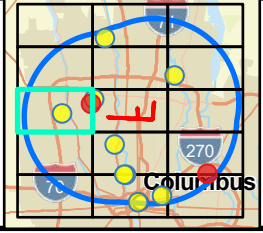


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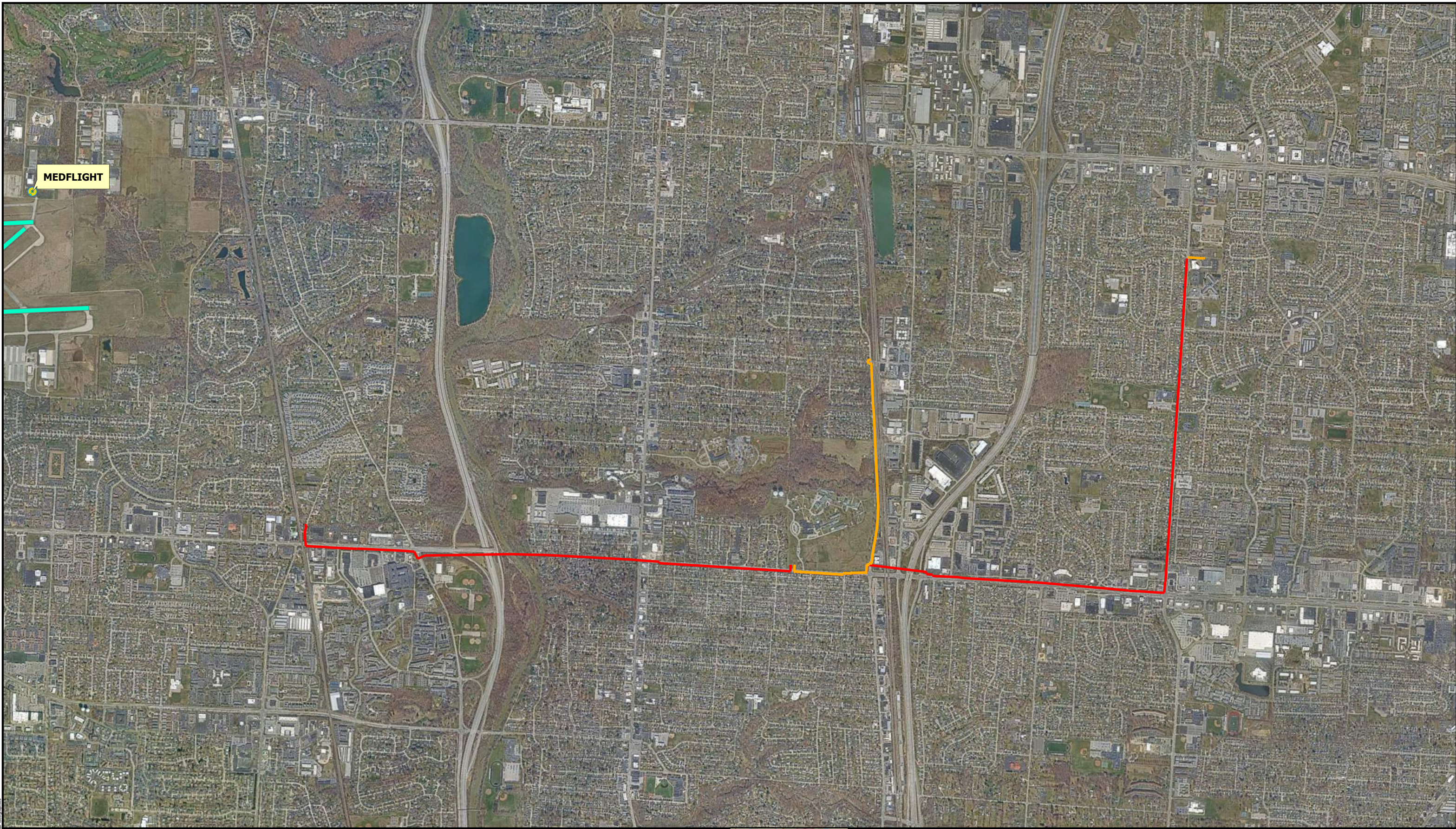


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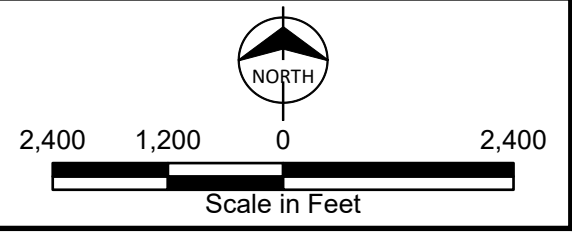
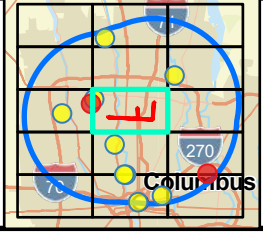


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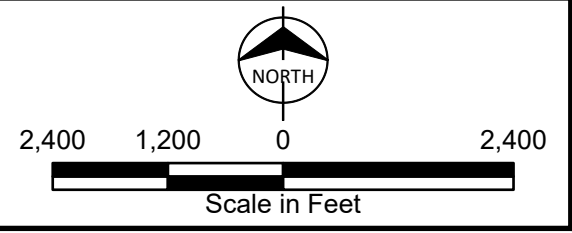
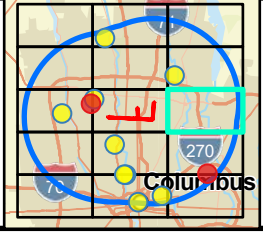
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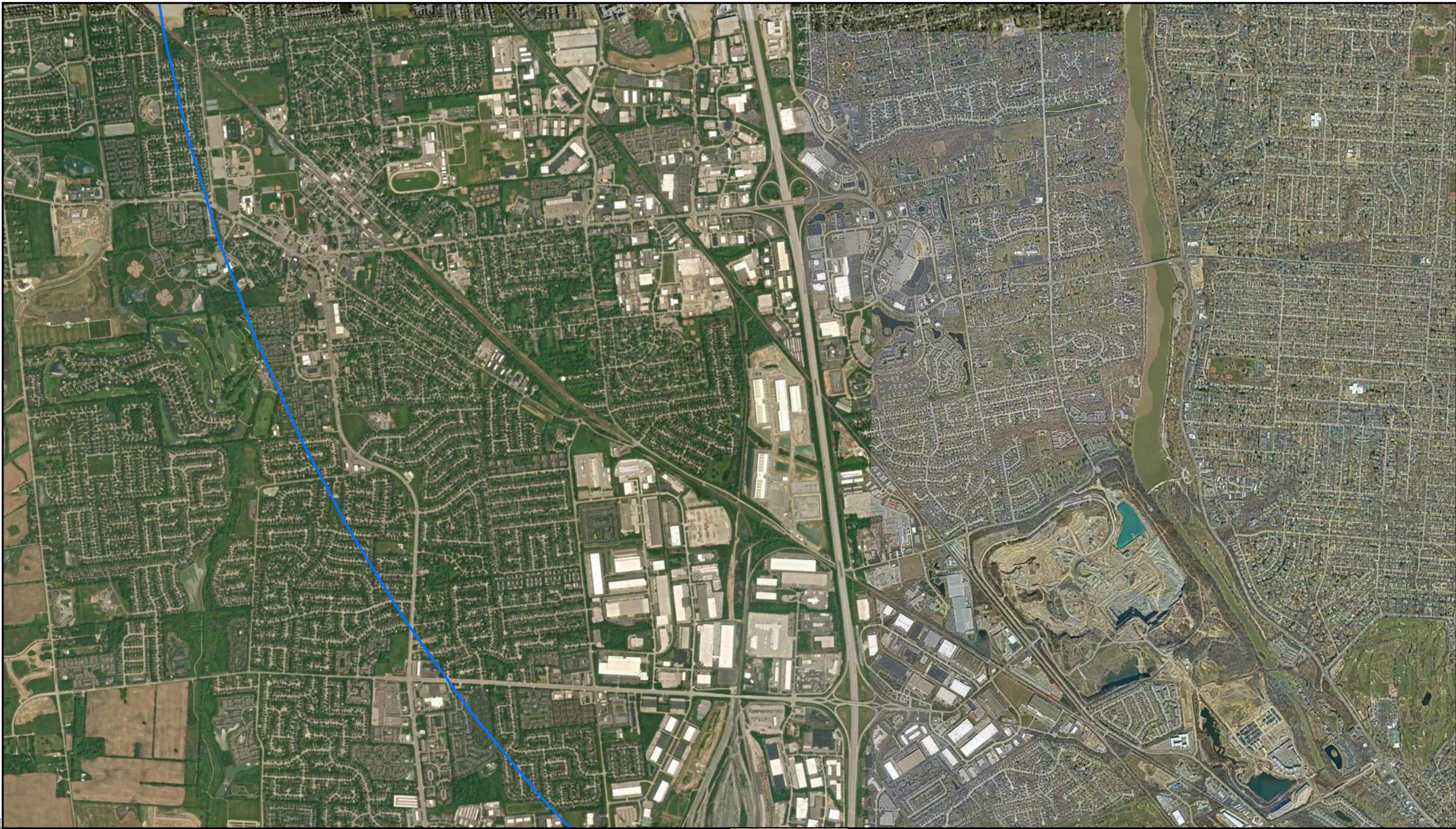
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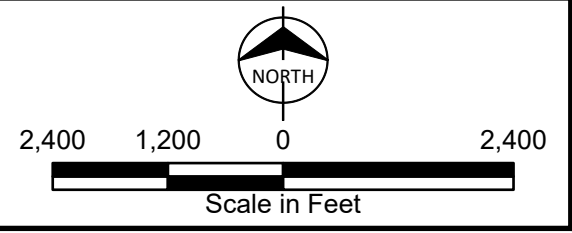
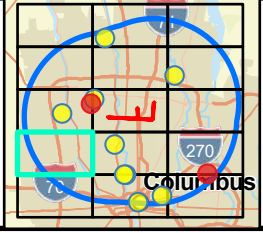


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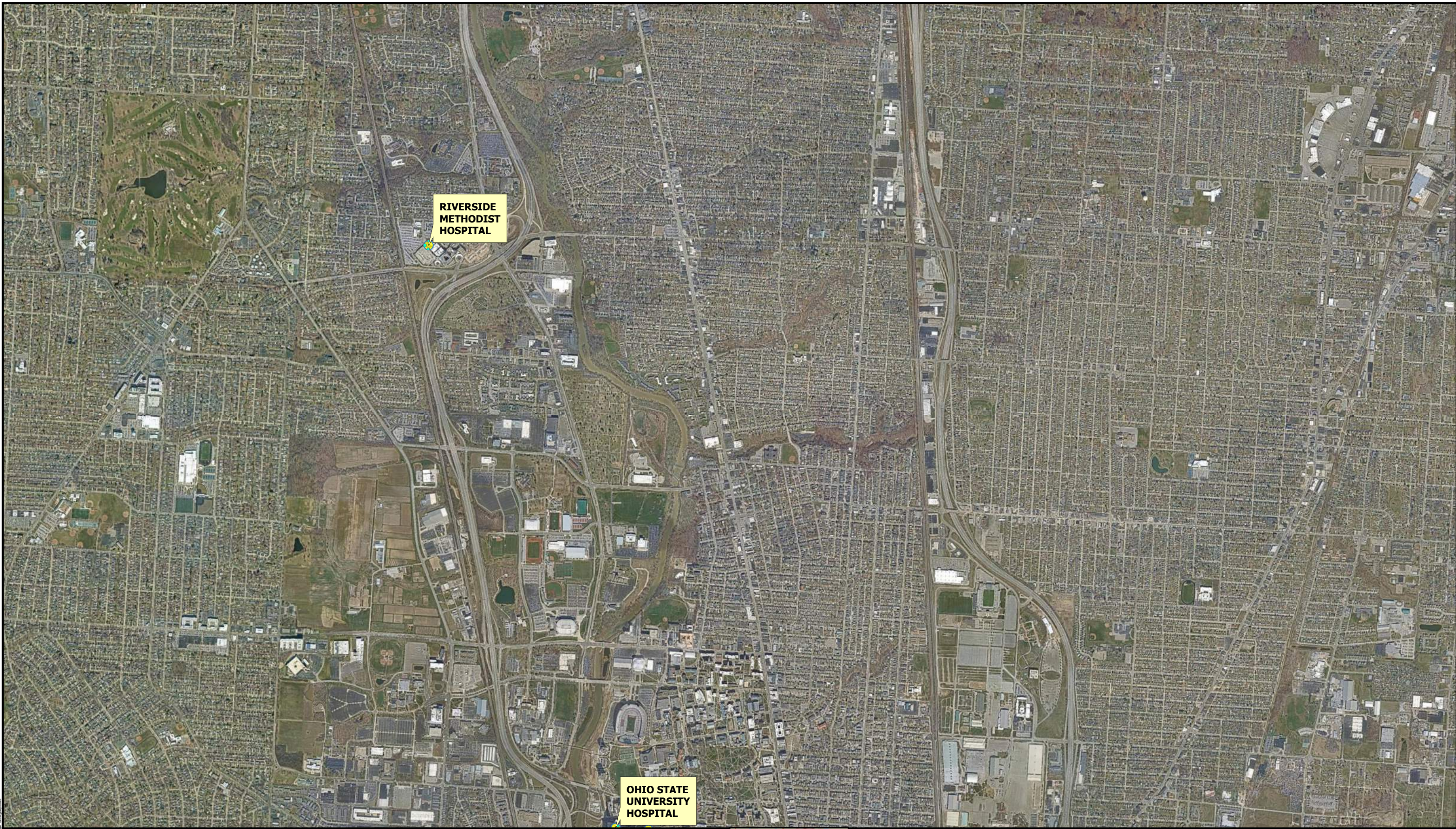


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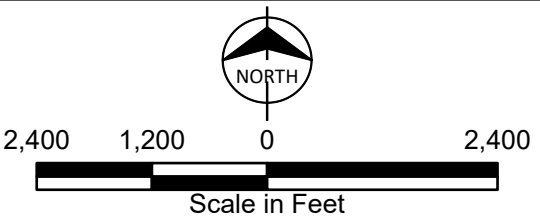
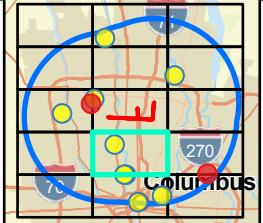


**RIVERSIDE  
METHODIST  
HOSPITAL**

**OHIO STATE  
UNIVERSITY  
HOSPITAL**

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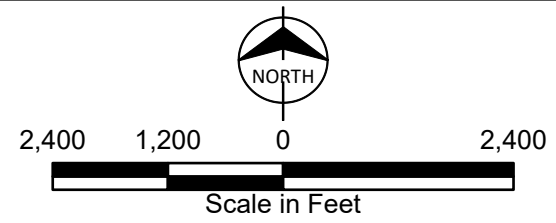
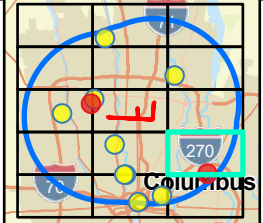


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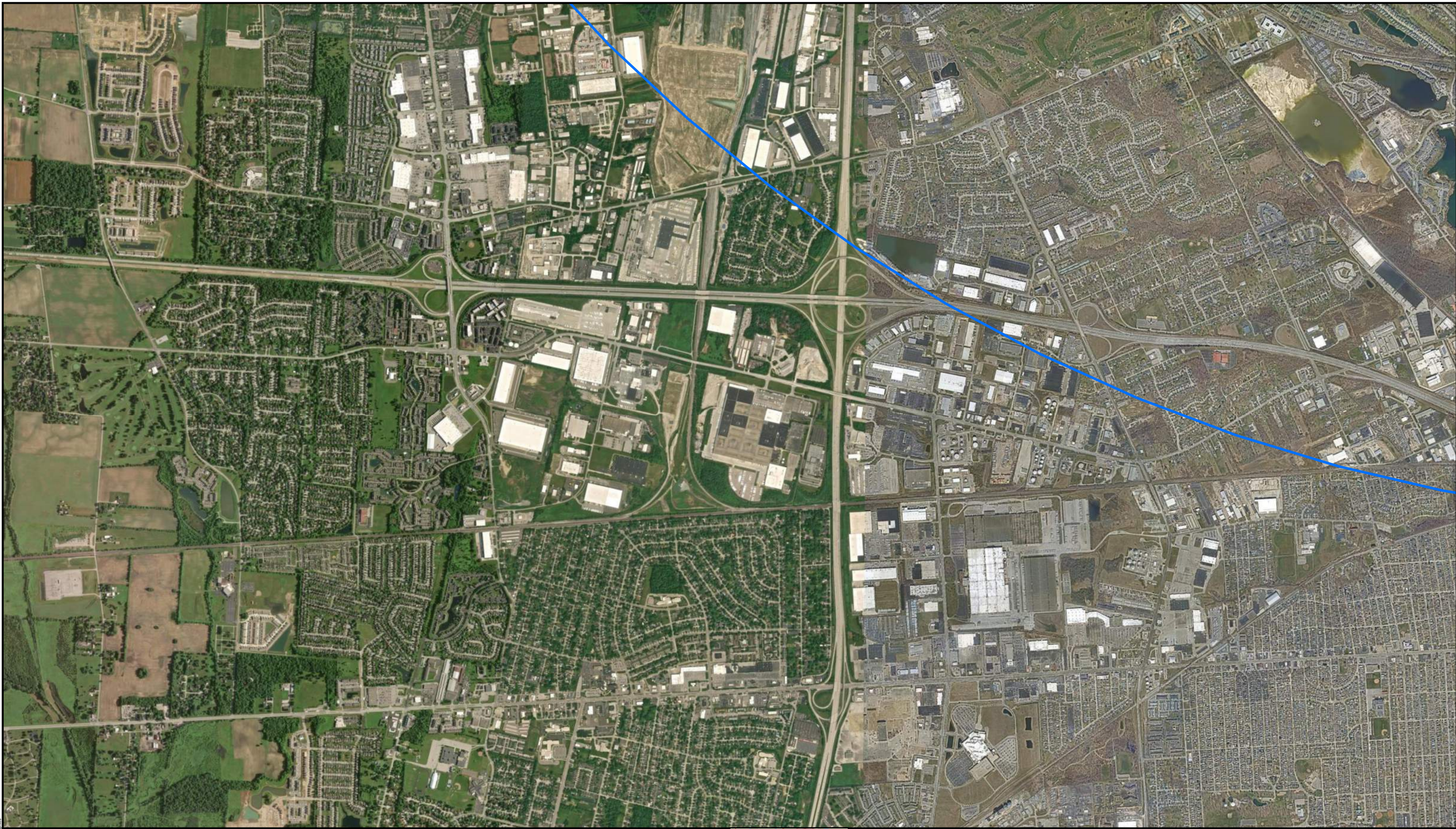


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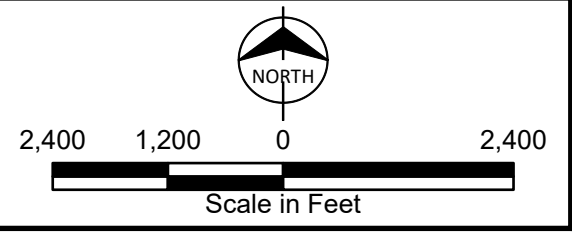
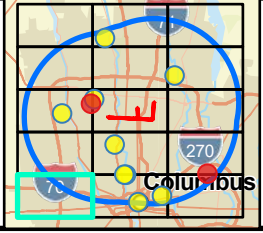


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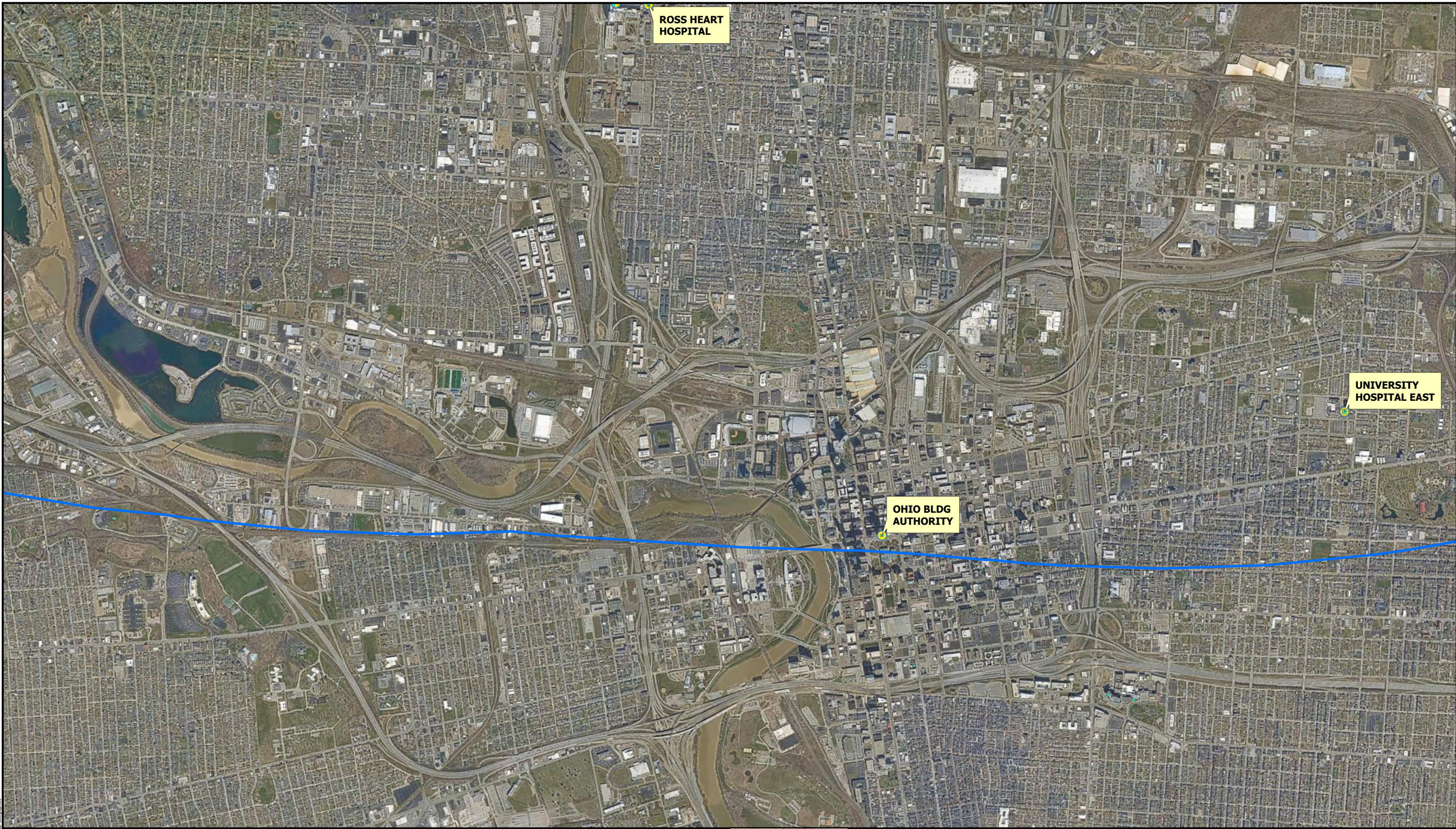


- Main Pipeline
- Lateral Pipeline
- 6-Nautical-Mile Boundary
- FAA-Registered Runways & Helipads

- Aviation Facilities
- Airport
  - Heliport

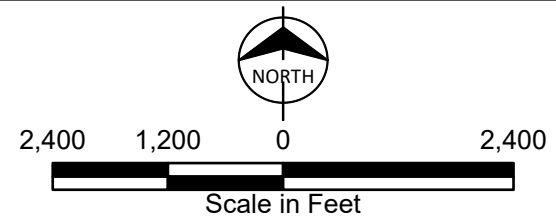
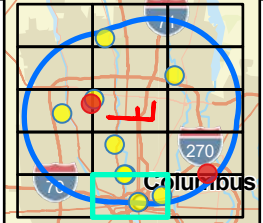


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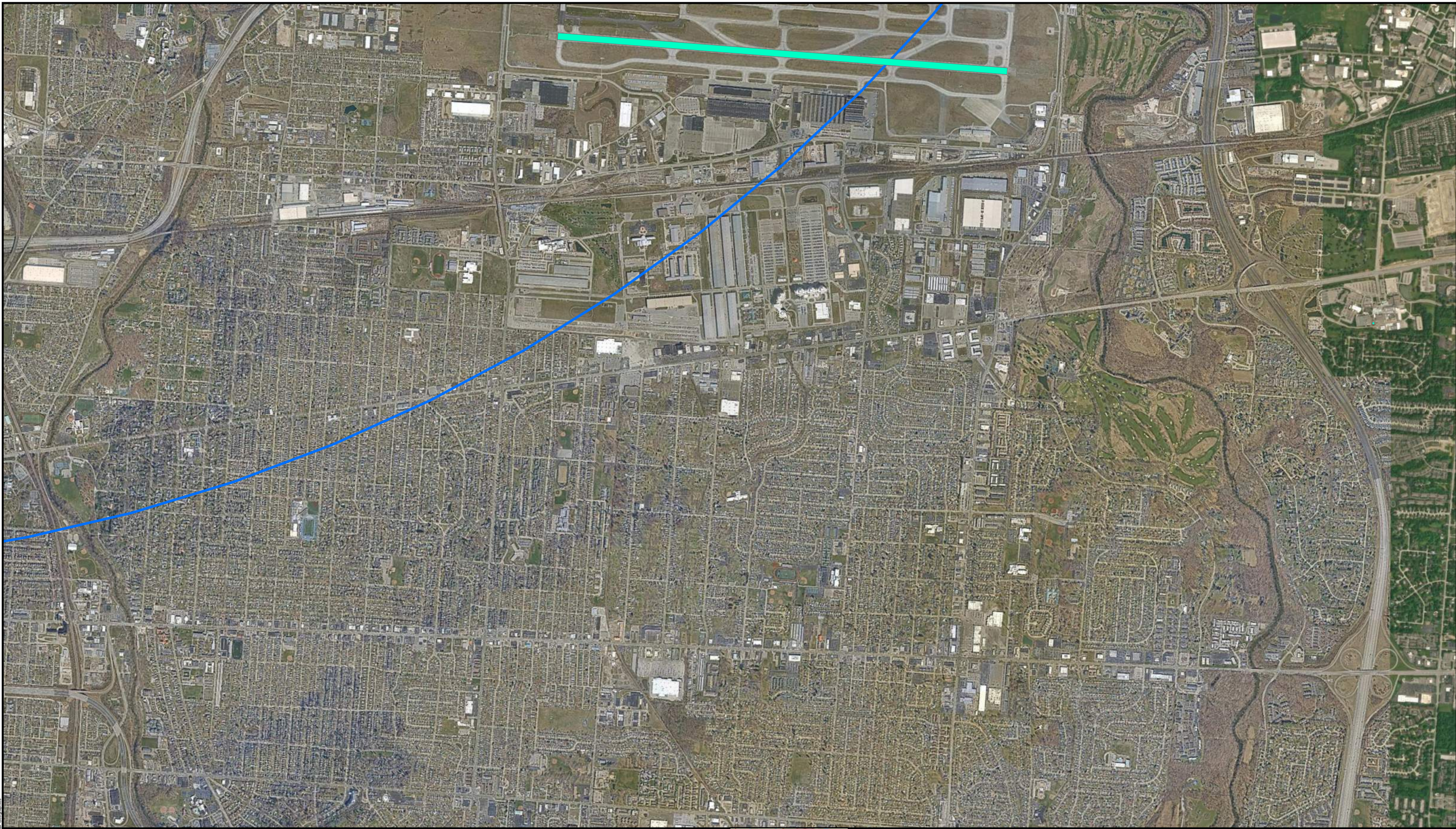


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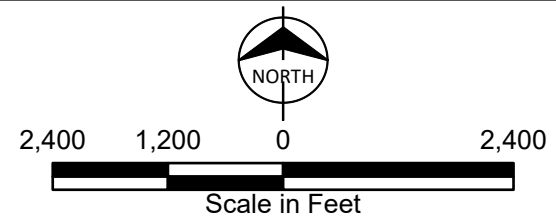
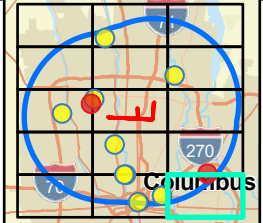


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