

290 W. Nationwide Blvd.  
Columbus, Ohio 43215  
Direct: 614.460.6988  
JosephClark@nisource.com



July 21, 2023

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

**RE:** *In the Matter of the Letter of Notification Application of Columbia Gas of Ohio, Inc. for An Adjustment to the Certificate of Environmental Compatibility and Public Need for the Intel Pipeline Project*  
**OPSB Case No. 23-0743-GA-BLN**

Dear Ms. Troupe:

Columbia Gas of Ohio, Inc. ("Columbia") submits this Letter of Notification, pursuant to R.C. 4906.03(F)(3) and Ohio Adm. Code 4906-6, concerning a proposed pipeline project known as the Intel Pipeline Project (the "Project"). This filing reflects certain adjustments to the Intel Pipeline Project, which was originally granted a Certificate of Environmental Compatibility and Public Need in Case No. 22-1135-GA-BLN (the "Certificate"). The adjustments to the Intel Pipeline Project presented herein represent route changes made as a result of permitting requirements of the Ohio Department of Transportation and the City of New Albany.

Pursuant to Ohio Adm.Code 4906-6-03(B), Columbia respectfully requests expedited approval of this Letter of Notification. Further, in accordance with Ohio Adm.Code 4906-6-04(A)(1) and (2), Columbia has hand delivered a copy of this filing to the offices of the Ohio Power Siting Board along with the required two-thousand-dollar payment.

Figure 1: Project Overall Map



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

**(B) General Information**

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

Columbia is proposing to construct a natural gas pipeline identified as the Intel Pipeline Project (the “Project”); the Project is generally located in the areas in and around New Albany and Johnstown, Ohio. The proposed Project will be approximately 22,135 feet (4.19 miles) in length and consist of construction of a 12-inch diameter high pressure gas distribution pipeline plus related facilities at the Intel plant. The Project will allow Columbia to provide required natural gas for Intel’s planned operations as well as serve businesses that will serve or supply Intel. The pipeline will meet the requirements of the federal Pipeline and Hazardous Materials Safety Administration’s (“PHMSA”) recently effective rule changes 49 C.F.R. 191 and 192, commonly referred to as the “PHMSA Mega Rule”.

Much of the 12-inch natural gas main will be constructed within the public road rights-of-way within Delaware County, Licking County, and Franklin County, Ohio as well as the City of New Albany. Exceptions include the crossing of

other utility easements such as railroads, interstate roads, and environmental features such as streams and rivers. Several locations of temporary easement have been secured along the northern side US-62 as well as along the western side of Clover Valley Rd. Open cut installation methods will be utilized to install those sections of the pipeline completely within the public rights-of-way. Approximately 6 locations are anticipated to be conventional bored to avoid culverts and environmental streams. No horizontal directional drilling will be required on this project.

This Project meets the requirements of the Letter of Notification as it is an installation of gas pipelines or pipeline segments greater than one mile in length but not greater than 5 miles in length. See Appendix B of Ohio Admin. Code 4906-1-01.

Finally, this Application is being brought to reflect the adjustments to the Project, in response to permits from the Ohio Department of Transportation and the City of New Albany. These adjustments are:

- Permitting requirements from the Ohio Department of Transportation (“ODOT”) requested the pipeline be shifted as far off the edge of US-62 as possible as well as keep US-62 open to traffic for as much of the project as possible. This request resulted in an approximate alignment shift of 10 feet north-northwest for approximately 3,100 feet. The shift will take place between Tippet Road and Beech Road. By shifting the pipeline, Columbia acquired an additional 30-feet of temporary workspace for most of the 3,100 feet. One residence along US 62 did not grant temporary workspace; however, Columbia acquired larger temporary workspace of about 135 feet by about 108 feet next to this residence.
- ODOT procured a new public right-of-way and installed a turn lane into Beech Road, causing the width of US 62 to expand. To comply with ODOT’s request to keep the pipe as far off the pavement as possible caused further shift in alignment of the pipeline by approximately 57 feet to the north-northwest for approximately 795 feet.
- ODOT also requested that Columbia Gas conventionally bore US-62 versus perform an open cut installation to make the crossing to Beech Rd. With the requirement for a conventional bore, Columbia acquired an additional 30 feet beyond road ROW for approximately 50 feet in width of temporary easement for workspace. The receiving bore pit will be located on Beech Road and will not extend past the road right-of-way limit.

- The City of New Albany ROW permit is requiring Columbia to maintain one lane of traffic on Beech Road versus a full road closure during installation. To accommodate this permit requirement, Columbia must shift the pipeline 8 feet to the east on Beech Road for approximately 2,700 feet. Columbia did not acquire additional workspace, nor did it shift its workspace due to the alignment change. Instead, Columbia's workspace decreased by 30 feet for approximately 2,700 feet.
- The City of New Albany ROW permit is also requiring that traffic be maintained to the Kokosing laydown yard located on Miller Rd near the intersection of Miller Rd and Clover Valley Rd. The City of New Albany will have various road closures occurring while Miller Rd will be closed for pipeline construction. To alleviate this access issue to the Kokosing laydown yard, Columbia will construct the pipeline in two phases on Miller Rd – one closure to the West of the Kokosing laydown yard and one closure to the East of the Kokosing laydown yard. There will not be any changes to the alignment or installation method, but there were adjustments to the MOT plans to make this occur as well as the installation of a temporary access road that required a small temporary easement that will allow Kokosing to still access their laydown yard when Miller Rd is closed to the West of the Kokosing laydown yard.

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

Intel is a multinational corporation and technology company headquartered in Santa Clara, CA. They are the world's largest semiconductor chip manufacturer and one of the top 50 largest United States corporations. Today, Intel supplies microprocessors, manufacturers motherboard chips, and other devices for the communications and computing industries.

Intel will be making a substantial investment (>\$20 billion) in new facilities and equipment to increase its output of domestic made semiconductors. The company will install its fabrication facilities over an approximately 1,000-acre site in New Albany, creating a multitude of additional infrastructure buildout from other utilities and state-run organizations. This includes water, sewer, electric, and road improvements. The Project's new space will create thousands of indirect jobs and generate additional opportunities for current Ohio businesses.

Columbia needs to build out its facilities to serve Intel, as well as the expected suppliers of materials, goods, and services to Intel.

PHMSA has recently begun implementing a comprehensive, three-part rule, aimed at increasing pipeline safety. The Final Rule currently consists of three parts and is known as the PHMSA Mega Rule.

Mega Rule Part 1, which went into effect in 2020 involves new regulations concerning Maximum Allowable Operating Pressure (MAOP) records and testing, material verification, assessments outside High Consequence Areas, among other safety measures.

In constructing the 12-inch pipeline, Columbia will be fulfilling regulatory requirements of the PHMSA Mega Rule through appropriate planning, design, construction, operations and maintenance, and integrity management processes.

**(3) The location of the project in relation to existing or proposed lines and substations shown on an area system map of sufficient scale and size to show existing and proposed transmission facilities in the project area.**

The map shown in Appendix A: Project Overall Map illustrates the location of the Project in relation to existing transmission facilities in the project area.

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

The proposed route was developed taking into consideration private property, the density of below grade utilities and inevitable impact to the public, and environmental features. The proposed route was purposely located within the roadway limits as much as possible. A route analysis was performed, and the proposed route minimizes the number of residential homes and businesses affected. Installation methods of conventional bore further limit impact to, other infrastructure such as environmental features and culverts. The proposed route is designed to minimize impacts to forested areas and natural resources. The route impacts no private property owners and crosses two streams that have culverts running below the roadway. The route has 147

structures within 1,000 feet of the centerline, none of which are schools and daycares and 2 are places of worship.

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

Columbia began reaching out to landowners in 2022 regarding this Project to obtain survey notice access. Columbia will be conducting extensive conversations with many of the adjacent property owners and residents as this Project progresses. Columbia also plans to further communicate to customers through written communications as well as in local newspaper advertisement. The first letter will be the affected property communication required by Ohio Adm. Code 4906-6-08(B).

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

Vegetation clearing began in May 2023 following the issuance of the Certificate in Case No. 22-1135-GA-BLN. Within city road rights-of-way and the temporary easement areas acquired, no trees are anticipated to be taken down at this time. Columbia has reviewed and designed the pipeline to be placed in the right-of-way as much as practical to reduce and minimize environmental impact. Installation of the proposed pipeline began in May of 2023 following the original OPSB filing, and the in-service date (completion date) of this Project is expected to be on or about January 2024.

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

The topographic map shown in Appendix A: Project Overall Map is at 1" =1,693' scale. The map depicts the Project centerline as a solid red line and major street crossings.

Maintenance of Traffic (MOT) Plans are shown in Appendix F.

**(8) A list of properties for which the applicant has obtained easements, options, and/or land use agreements necessary to construct and operate the facility and a list of the additional properties for which such agreements have not been obtained.**

Temporary workspace has been acquired along the northern side of US-62 following the request of ODOT to shift the pipeline as far from the road as possible, the addition of the turn lane that was added to US-62, and the request to bore US-62 to complete that crossing. This allows Columbia to minimize traffic impacts by keeping construction out of the road and perform construction activities from the temporary easement area versus utilizing the road ROW for workspace where possible.

Additional temporary easement for an access road was needed because of the City of New Albany ROW permit to allow access to the Kokosing laydown yard during pipeline construction along Miller Rd. This temporary easement is located at the southwest corner of Miller Rd and Clover Valley Rd.

The final area of temporary easement was addressed by an engineering adjustment but noted here for clarity for the temporary workspace obtained along the west side of Clover Valley Rd. Following the receipt of the ROW permit from the City of New Albany, Columbia is no longer permitted to close down either lane of Clover Valley Rd. Additional temporary easement was acquired in order to provide sufficient room for construction without closing any of Clover Vally Rd during construction.

Overall, the pipeline will be placed within either the road right-of-way or property owned by Columbia. Appendix G contains the list of property owners for temporary easements, and Appendix H contains the exhibits used to secure those easements. All the easements needed have been secured.

**(9) Technical features of the project.**

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

The proposed pipeline will be tested such that it will have a Maximum Allowable Operating Pressure (“MAOP”) of 275 pounds per square inch gauge (psig). Columbia will be installing 12-inch, coated steel pipe with a wall thickness of 0.375 inches.

Under the current design, temporary easements were needed to aide in the construction of the pipeline, but the pipeline will reside completely within public right-of-way. Columbia has secured the temporary easements from

property owners. The location of the workspaces, utility easements, and right-of-way are shown in the drawings included in Appendix B.

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

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

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

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

**(c) The estimated cost of the project.**

The estimated total cost of the proposed Project is \$44,100,000.

#### **(10) Social and Ecological Impacts of the Project.**

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

The Project is located within Delaware County, Franklin County, and Licking County Ohio. More specifically the Project is within Harlem Township, Plain Township, Monroe Township, Jersey Township, and the City of New Albany. The current land use along the route is primarily comprised of residential and commercial properties, with minimal patches of forest. There are also transportation-related land use areas including four (4) road crossings.

Currently, the route has 147 structures within 1,000 feet of the centerline, no schools or daycares and 2 places of worship were identified based on desktop analysis.



There are no planned residential developments within the Project study corridor that were discovered as part of the survey. The Project is not expected to significantly impact existing or planned land use within the vicinity of the Project. There are no federal or state lands that will be crossed by the Project with the exception of state-owned road rights-of-way. The majority of impacts anticipated for the proposed construction will be temporary in nature due to Columbia's plan to restore the pipeline right-of-way to the pre-construction contours when the Project is complete.

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

All proposed construction activities for the 4.15-mile, 12-inch diameter pipeline are to be located within the existing road right-of-way except along US-62 and along Clover Valley Rd where temporary easements were secured. The temporary easements along Clover Valley Rd were not acquired from agricultural land. For a portion of the temporary easements along US-62, agricultural land was acquired, but that agricultural land is not part of agricultural district land or preserved/protected land.

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

Columbia conducted a cultural resource desktop review and assessment for the Project. The cultural resource review and assessment of the 4.15-mile pipeline corridor conducted on December 12, 2022, was revised on July 7, 2023, for added temporary easement areas included, but was not limited to, a review of the Ohio History Connection's online database of recorded cultural resources. The Ohio History Connection serves as the State Historic Preservation Office ("SHPO") for Ohio. The database review encompassed both publicly available information and restricted archaeological information that can be accessed by qualified professionals. Based on the review, there are no above-ground historic resources or archaeological sites documented within the Project area; however, there are fifty-five (55) other cultural resources documented within a 1-mile (1.6-km) radius of Project area. The background

review and assessment were conducted in support of Columbia's compliance with Section 106 of the National Historic Preservation Act ("NHPA"). A review of aerial imagery and topographic maps performed as element of the desktop review revealed that most of the study area has been disturbed by modern development, including road and building construction and agricultural activities. Based on the information provided and the results of this desktop assessment, due to ongoing road activities since at least the early 1990s, finding intact cultural deposits is at low probability within the majority of the Project area. However, due to previously recorded historic structures near the eastern workspace, there is a probability for intact cultural features within the workspace. This background review and assessment was conducted in support of Columbia's compliance with Section 106 of the NHPA.

See attached Appendix C for the Cultural Desktop Review.

Columbia submitted the revised cultural desktop to SHPO on 7/17/23, and a copy of this correspondence is included in Appendix C.

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

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

**Franklin County**

Erica C. Crawley  
Franklin County Commissioner  
President  
373 S. High Street  
Columbus, Ohio 43215

Kevin L. Boyce  
Franklin County Commissioner  
373 S. High Street  
Columbus, Ohio 43215

John O'Grady  
Franklin County Commissioner  
373 S. High Street  
Columbus, Ohio 43215

Kenneth N. Wilson  
Franklin County Administrator  
373 S. High Street  
Columbus, Ohio 43215

Jennifer Fish  
Franklin County Soil and Water  
Conservation District  
1404 Goodale Boulevard, Suite 100  
Columbus, Ohio 43212

Cornell R. Robertson, P.E., P.S.  
Franklin County Engineer  
970 Dublin Road  
Columbus, Ohio 43215

**City of Columbus**

Hon. Andrew Ginther  
City of Columbus Mayor  
90 W. Broad Street  
Columbus, Ohio 43215

Shannon G. Hardin  
City of Columbus Council President  
90 W. Broad Street  
Columbus, Ohio 43215

Elizabeth Brown  
City of Columbus, Council President  
Pro Tempore  
90 W. Broad Street  
Columbus, Ohio 43215

Emmanuel V. Remy  
Columbus City Council  
90 W. Broad Street  
Columbus, Ohio 43215

Scott Messer  
City of Columbus Director  
Department of Building and Zoning  
Services  
111 N. Front Street  
Columbus, Ohio 43215

Jennifer Gallagher  
City of Columbus Director  
Department of Public Service  
111 N. Front Street  
Columbus, Ohio 43215

**Plain Township**

Ben Collins  
Plain Township Administrator  
45 Second Street

P.O. Box 273  
New Albany, OH 43054-0273

Bud Zappitelli  
Plain Township Fiscal Officer  
45 Second Street  
P.O. Box 273  
New Albany, OH 43054-0273

Dave Ferguson  
Plain Township Trustee  
45 Second Street  
P.O. Box 273  
New Albany, OH 43054-0273

Jill Beckett-Hill  
Plain Township Trustee  
45 Second Street  
P.O. Box 273  
New Albany, OH 43054-0273

Mary Fee  
Plain Township  
Plain Township Zoning and  
Administrative Coordinator  
45 Second Street  
P.O. Box 273  
New Albany, OH 43054-0273

Courtney Rodgers  
Plain Township Finance Officer  
45 Second Street  
P.O. Box 273  
New Albany, OH 43054-0273

Keri Mollard  
Plain Township Trustee  
45 Second Street  
P.O. Box 273  
New Albany, OH 43054-0273

### Delaware County

Jeff Benton Delaware County Commissioner 91 N. Sandusky St. Delaware, OH 43015	Barb Lewis Delaware County Commissioner 91 N. Sandusky St. Delaware, OH 43015
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Gary Merrell Delaware County Commissioner 91 N. Sandusky St. Delaware, OH 43015	Tracie Davies Delaware County Administrator 91 N. Sandusky St. Delaware, OH 43015
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Jane Hawes Delaware County Communications Director 91 N. Sandusky St. Delaware, OH 43015	Jennifer Walraven Delaware County Clerk of the Board 91 N. Sandusky St. Delaware, OH 43015
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### Harlem Township

Jerry Paul Harlem County Trustee 3883 S. St. Rt. 605 Galena, Ohio 43021	Carl Richison Harlem County Trustee 3883 S. St. Rt. 605 Galena, Ohio 43021
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David Jackson Harlem County Trustee Chairperson 3883 S. St. Rt. 605 Galena, Ohio 43021	Lisa Hursey Harlem County Fiscal Officer Chairperson 3883 S. St. Rt. 605 Galena, Ohio 43021
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**Licking County**

Rick Black  
Licking County Commissioner  
President  
20 South Second Street  
Newark, Ohio 43055

Timothy E. Bubb  
Licking County Commissioner  
Vice President  
20 South Second Street  
Newark, Ohio 43055

Duane H. Flowers  
Licking County Commissioner  
20 South Second Street  
Newark, Ohio 43055

**Jersey Township**

Jeff Fry  
Jersey Township Trustee  
10910 Jug Street  
Johnstown, OH 43031

Dan Wetzel  
Jersey Township Trustee  
10910 Jug Street  
Johnstown, OH 43031

Ben Pieper  
Jersey Township Trustee  
10910 Jug Street  
Johnstown, OH 43031

Marko Jesenko  
Jersey Township Fiscal Officer  
10910 Jug Street  
Johnstown, OH 43031

Rob Platte  
Jersey Township Administrator  
10910 Jug Street  
Johnstown, OH 43031

City of New Albany

Josh Poland  
New Albany  
Public Information Officer  
99 W. Main St.  
New Albany, OH 43054

Sloan Spalding  
Mayor of New Albany  
99 W. Main St.  
New Albany, OH 43054

Mike Durik  
New Albany City Council Member  
99 W. Main St.  
New Albany, OH 43054

Kasey Kist  
New Albany City Council Member  
99 W. Main St.  
New Albany, OH 43054

Andrea Wiltrout  
New Albany City Council Member  
99 W. Main St.  
New Albany, OH 43054

Marlene Brisk  
President Pro Tempore  
99 W. Main St.  
New Albany, OH 43054

Chip Fellows  
New Albany City Council Member  
99 W. Main St.  
New Albany, OH 43054

Matt Shull  
New Albany City Council Member  
99 W. Main St.  
New Albany, OH 43054

**City of Johnstown**

Donald Barnard  
Mayor of Johnstown  
599 South Main Street  
Johnstown, OH 43031

Jon Merriman  
Johnstown City Council President  
599 South Main Street  
Johnstown, OH 43031

Sharon Hendren  
Johnstown City Council  
Acting President  
599 South Main Street  
Johnstown, OH 43031

Ryan Green  
Johnstown City Council  
599 South Main Street  
Johnstown, OH 43031

Charlie Campbell  
Johnstown City Council  
599 South Main Street  
Johnstown, OH 43031

Nicole Shook  
Johnstown City Council  
599 South Main Street  
Johnstown, OH 43031

Bob Orsini  
Johnstown City Council  
599 South Main Street  
Johnstown, OH 43031

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

- Ohio Department of Natural Resources (ODNR) State Threatened and Endangered Species Consultation.
- Ohio Environmental Protection Agency (OEPA) Section 402 National Pollutant Discharge Elimination System (NPDES) Construction Stormwater Permit and Stormwater Pollution Prevention Plan (SWPPP) requirements.
- City of New Albany Right-of-Way Permit
- Licking County Right-of-Way Permit
- Franklin County Right-of-Way Permit
- Delaware County Right-of-Way Permit
- Ohio Department of Transportation (ODOT) Right-of-Way Permit



**(e) A description of the applicant’s investigation concerning the presence or absence of federal and state designated species (including endangered species, threatened species, rare species, species proposed for listing, species under review for listing, and species of special interest) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.**

An Information for Planning and Consultation (I Pac) Official Species List was completed on December 10, 2022, and revised on July 7, 2023 for added temporary workspaces on the USFWS website (<https://ipac.ecosphere.fws.gov/>). The USFWS Official Species Listed yielded two (2) federally listed species, which include the Indiana bat (*Myotis neotomidis*, endangered), northern long-eared bat (*Myotis septentrionalis*, threatened). The list also includes tri-colored bat (*Perimyotis subflavus*), which is proposed to be listed as endangered, and the monarch butterfly (*Danaus plexippus*), which is classified as a candidate species.

According to the ODNR – Division of Wildlife, “state-listed species for Franklin County (November 21, 2022)”, the following are listed as threatened and endangered species for Franklin County: Indiana bat (endangered), black bear (*Ursus americanus*; endangered), northern long-eared bat (threatened), upland sandpiper (*Bartramia longicauda*; endangered), American bittern (*Botaurus lentiginosus*; endangered), cattle egret (*Bubulcus ibis*; endangered), lark sparrow (*Chondestes grammacus*; endangered), northern harrier (*Circus hudsonius*; endangered), sandhill crane (*Grus canadensis*; threatened), least bittern (*Ixobrychus exilis*; threatened), black-crowned night-heron (*Nycticorax nycticorax*; threatened), barn owl (*Tyto alba*; threatened), caddisfly (*Chimarra socia*; endangered), Iowa darter (*Etheostoma exile*; endangered), spotted darter (*Etheostoma maculatum*; endangered), tongue-tied minnow (*Exoglossum laurae*; endangered), goldeye (*Hiodon alosoides*; endangered), northern brook lamprey (*Ichthyomyzon fossor*; endangered), shortnose gar (*Lepisosteus platostomus*; endangered), popeye shiner (*Notropis ariommus*; endangered), lake chubsucker (*Erimyzon sucetta*; threatened), Indiana darter (*Etheostoma ineolae*; threatened), paddlefish (*Polyodon spathula*; threatened), butterfly (*Ellipsaria ineolata*; endangered), elephant-ear (*Elliptio crassidens*; endangered), purple cat’s paw (*Epioblasma obliquata*; endangered), snuffbox (*Epioblasma triquetra*; endangered), longsolid (*Fusconaia subrotunda*; endangered), pink mucket (*Lampsilis abrupta*; endangered), pocketbook (*Lampsilis ovata*; endangered), washboard (*Megalania nervosa*; endangered),

clubshell (*Pleurobema clava*; endangered), Ohio pigtoe (*Pleurobema cordatum*; endangered), rabbitsfoot (*Theliderma cylindrica*; endangered), rayed bean (*Villosa fabalis*; endangered), black sandshell (*Ligumia recta*; threatened), threehorn wartyback (*Obliquaria reflexa*; threatened), fawnsfoot (*Truncilla donaciformis*; threatened), pondhorn (*Uniomerus tetralasmus*; threatened), smooth greensnake (*Opheodrys vernalis*; endangered), Gattinger's foxglove (*Agalinis gattingeri*; threatened), spreading rock cress (*Arabis patens*; endangered) and pale umbrella-sedge (*Cyperus acuminatus*, endangered).

According to the ODNR – Division of Wildlife, “state-listed species for Delaware County (November 21, 2022)”, the following are listed as threatened and endangered species for Delaware County: northern long-eared bat (threatened), American bittern (*Botaurus lentiginosus*; endangered), lark sparrow (*Chondestes grammacus*; endangered), black-crowned night-heron (*Nycticorax nycticorax*; threatened), marsh bluet (*Enallagma erbiium*; threatened), snuffbox (*Epioblasma triquetra*; endangered), clubshell (*Pleurobema clava*; endangered), Ohio pigtoe (*Pleurobema cordatum*; endangered), rabbitsfoot (*Theliderma cylindrica*; endangered), rayed bean (*Villosa fabalis*; endangered), black sandshell (*Ligumia recta*; threatened), pondhorn (*Uniomerus tetralasmus*; threatened), Gattinger's foxglove (*Agalinis gattingeri*; threatened), and timid sedge (*Carex timida*, threatened).

According to the ODNR – Division of Wildlife, “state-listed species for Licking County (November 21, 2022)”, the following are listed as threatened and endangered species for Licking County: black bear (*Ursus americanus*; endangered), northern long-eared bat (threatened), upland sandpiper (*Bartramia longicauda*; endangered), northern harrier (*Circus hudsonius*; endangered), least bittern (*Ixobrychus exilis*; threatened), barn owl (*Tyto alba*; threatened), green-faced clubtail (*Gomphus viridifrons*; threatened), lake chubsucker (*Erimyzon sucetta*; threatened), fawnsfoot (*Truncilla donaciformis*; threatened), longsolid (*Fusconaia subrotunda*; endangered), sheepnose (*Plethobasus cyphus*; endangered), pondhorn (*Uniomerus tetralasmus*; threatened), eastern hellbender (*Cryptobranchus alleganiensis*; endangered), eastern massasauga (*Sistrurus catenatus*; endangered), spotted turtle (*Clemmys guttata*; threatened), cypress-knee sedge (*Carex decomposita*; endangered), mud sedge (*Carex limosa*; threatened), lined sedge (*Carex striatula*; endangered), slender spike-rush (*Eleocharis tenuis*; threatened), tawny cotton-grass (*Eriophorum virginicum*; threatened), buckbean (*Menyanthes trifoliata*; threatened), American water-milfoil (*Myriophyllum sibiricum*; endangered), rose pogonia (*Pogonia ophioglossoides*; threatened), tall cinquefoil (*Potentilla arguta*;

endangered), *Scheuchzeria* (*Scheuchzeria palustris*; endangered), and lesser bladderwort (*Utricularia minor*, threatened).

A project review request letter was submitted to ODNR on November 14, 2022, and again on July 7, 2023, seeking review of the potential impacts of the proposed Project on federal and state listed species and their habitats within the Project area. A response has not yet been provided by the ODNR. Once received, correspondence from the ODNR will be provided. Due to the Project type, size, location, and proposed implementation of seasonal tree cutting to avoid impacts to the federally listed bat species, Columbia anticipates that the Project, as proposed, is not likely to adversely affect the Indiana bat or northern long-eared bat.

The habitat within the proposed Project corridor is rural and primarily consists of mainly residential and commercial properties and agricultural land. Minimal patches of forested habitat are also present within the Project area. During the wetland delineation study, an on-site habitat assessment was performed to identify potential habitat for federally and state protected species within the Project Area. Common tree species observed within the Project area during the study include oak spp. (*Quercus spp.*), tulip poplar (*Liriodendron tulipifera*), red maple (*Acer rubrum*), pine (*Pinus spp.*), and sweetgum (*Liquidambar styraciflua*) species that dominate the canopy layer. Impacts to forested habitats will be avoided and minimized to the maximum extent practicable during construction. Please see the construction plans in Attachment B for impacted locations of forested habitat. In addition, Columbia will adhere to seasonal tree clearing timeframes recommended by both USFWS and ODNR. The Project will result in a small amount of tree clearing relative to the available number of trees in the immediate habitat surrounding the project area. Therefore, habitat removal is unlikely to result in significant impacts to bat species. Based on this information and the minimization and avoidance measures planned to be implemented by Columbia, it is not likely that direct impacts to the Indiana bat or northern long-eared bat will occur.

The Project was also assessed for the presence of habitats that could potentially support other listed species. No suitable habitat for the listed species was identified within the Project area.

Section 7(a)(2) of the Endangered Species Act (ESA) directs all Federal agencies to ensure that any action they authorize, fund, or carry-out does not jeopardize the continued existence of an endangered or threatened species or designated

or proposed critical habitat (collectively, referred to as protected resources). If there is a federal nexus for this Project, no tree clearing should occur on any portion of the Project area until consultation under Section 7 of the ESA is completed. Since the streams will be crossed where they are contained in culverts and beneath the roadway, the proposed Project does not require a federal permit, federal review, and/or authorization, nor does it require the use of federal funding to complete the Project. Therefore, Section 7 consultation is not required for the proposed Project.

Please see Appendix D for the Threatened and Endangered Species Memo and a copy of the correspondence of Columbia's submission to ODNR.

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

An environmental review of the area was conducted. According to the USFWS, there are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the Project area.

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) were reviewed to identify any flood hazard areas that have been mapped for the proposed pipeline route. Specifically, FEMA Floodplain Panel Maps 39089C0120H, 39089C0280H, and 39089C0257H (eff. 5/2/2007) were reviewed. The FEMA FIRM identified a regulated floodplain at the eastern end of Miller Road associated with Duncan Run. The proposed pipeline would not impact any mapped floodplain areas, as the area of the pipeline construction in the floodplain will be restored to pre-existing conditions with no change in surface elevations/topography. A copy of the aerial map with FEMA floodplain and floodway information for the Project area is included as Figures 4.1-4.4 of the Appendix E – Wetland Delineation Report.

A review of the National Wetlands Inventory (NWI) database identifies a stream crossing within the route. A copy of the NWI maps for the Project is

included as Figures 3.1-3.4 in the Wetland Delineation Report located in Appendix E.

A wetland and waterbody field survey was conducted in a study corridor that encompassed a 100-foot-wide survey corridor for a length of 4.15 miles on November 10, 2022 and December 6, 2022, and revised in July 7, 2023 for added temporary workspace. During the field survey, two streams, one forested wetland, and one emergent wetland were identified. The study corridor surveyed during the wetland delineation included the Project corridor and a 100-ft buffer centered along the proposed centerline. The project alignment avoids such regulated environmentally sensitive features, by drilling beneath culverts carrying these streams and avoiding impacts to wetlands. A copy of the Wetland Delineation Report is included in Appendix E.

Impacts to vegetation along the proposed pipeline route will be minimal as construction work is generally limited to the existing paved roadway. Forested habitat impacts have been minimized to the maximum extent practicable and will consist of clearing of landscaping trees, fence rows, and trees within small patches of forested habitat. Common tree species observed within the Project area include oak spp. (*Quercus spp.*), tulip poplar (*Liriodendron tulipifera*), red maple (*Acer rubrum*), pine (*Pinus spp.*), and sweetgum (*Liquidambar styraciflua*) species.

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

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

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

Respectfully submitted,

/s/ Joseph M. Clark

**Appendix A**

**Project Overall Map**

**Appendix B**

**Alignment and Workspace Drawings**

**Appendix C**

**Cultural Desktop Review**



**Appendix D**

**Threatened and Endangered Species Memo**

**Appendix E**

**Wetland Delineation Report**

**Appendix F**

**Maintenance of Traffic (MOT) Plan**

**Appendix G      List of Property Owners**

## Appendix H

## Easements Secured