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November 26, 2024

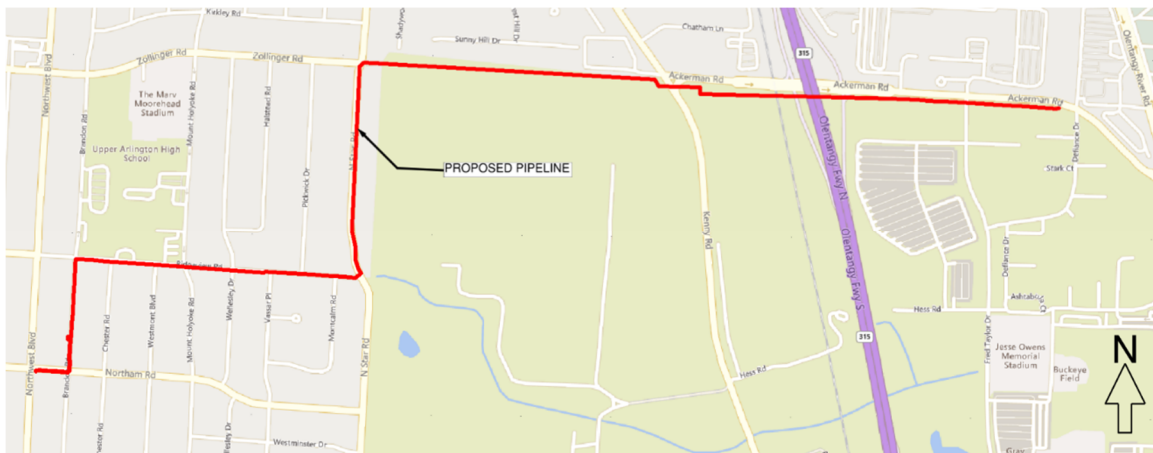
Ms. Tanowa Troupe
Secretary, Office of Administration
Ohio Power Siting Board
180 East Broad Street
Columbus, Ohio 43215

RE: *In the Matter of the Letter of Notification Application of Columbia Gas of Ohio, Inc. for a Certificate of Environmental Compatibility and Public Need for the West-Central NCHP Pipeline Project*
OPSB Case No. 24-0667-GA-BLN

Dear Ms. Troupe:

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

Attachment A, Figure 1: West-Central NCHP Pipeline Project Route



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

(B) General Information

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

Columbia is proposing to construct a natural gas pipeline identified as the West-Central NCHP Pipeline Project (the "Project") in Columbus, Ohio and Upper Arlington, Ohio. The proposed Project will be approximately 12,780 feet (2.4 miles) in length and consist of construction of 463 feet of 12-inch diameter, 70 feet of 16-inch diameter, and 12,247 feet of 20-inch diameter high pressure gas transmission class pipeline. The Project will allow Columbia to continue reliably serving the central Ohio region, improve safety, and further Columbia's efforts to meet mandates of the Pipeline and Hazardous Materials Safety Administration's ("PHMSA") recently effective rule changes in 49 C.F.R. 191 and 192, commonly referred to as the "PHMSA Mega Rule."

Much of the 12-inch, 16-inch, and 20-inch natural gas main will be constructed within the public road right-of-way within the City of Upper Arlington as well as within permanent private pipeline easements from The Ohio State University (through the State of Ohio). Columbia plans to utilize a combination of conventional boring, horizontal directional drilling, and the open cut installation method to construct the Project. If any new information is discovered, or for commercially reasonable reasons, Columbia may utilize these methods interchangeably during construction of the Project.

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

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

PHMSA has recently begun implementing a comprehensive, three-part rule, aimed at increasing pipeline safety. These regulations are commonly known as the PHMSA Mega Rule. The portions of the Project that are 20-inch diameter are being installed to comply with the PHMSA Mega Rule.

Mega Rule Part 1, which went into effect in 2020, involves new regulations for reconfirming the maximum allowable operating pressure (“MAOP”) of pipelines and facilities installed before July 1, 2020, that are in certain class locations or high consequence areas (“HCAs”), and do not have available certain traceable, verifiable, and complete (“TVC”) records, such as material attributes and sufficient pressure test records. Operators have until 2035 to comply with these requirements, but 50% of the work in scope must be completed by July 2028. The Project is part of Columbia’s plan to comply with the PHMSA Mega Rule.¹

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

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

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

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

The proposed route was developed taking into consideration the current pipeline route, private property, the density of below-grade utilities, impact to the public, and environmental features. The proposed route minimizes the number of residential homes and businesses directly affected by the Project. Installation methods have been selected to further limit impact to high traffic

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

roads, other infrastructure such as railroads, environmental features, and trees. Tree clearing and trimming will occur along the pipeline route as needed for safe construction and pipeline operation purposes along the public right-of-way as well as for permanent and temporary easement areas. Columbia currently plans to HDD under the trees located on The Ohio State University property in order to minimize impacts to the mature trees along that portion of the Project. The HDD profile is shown on Attachment B. On The Ohio State University property, for a 5' wide path, Columbia will clear some brush as well as immature trees that are less than 10' tall or less than 2" in diameter. There are multiple cultural resources previously recorded within a 0.5-mile radius of the proposed alignment. The route directly impacts The Ohio State University property and crosses under one railroad bridge. The route has 1,034 structures within 1,000 feet of the centerline, five of which are schools or daycares, and one is a place of worship. Please see Attachment G for the Cultural Memorandum for the details of the cultural study.

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

Columbia will provide the notices required by the OPSB rules, including notices to landowners, newspaper notice, a copy of this Letter of Notification (with attachments) posted in libraries, and notices to public officials. Columbia will also be hosting a website dedicated to this phase of its Mega Rule compliance. That website is www.columbiagasohio.com/west-central-nchp. Additionally, Columbia has communicated with The Ohio State University for the use of their private property, as well as the City of Upper Arlington regarding communications with residents surrounding the Project. Columbia hosted a community meeting on November 13, 2024 at 6:00pm at the City of Upper Arlington Public Library. Columbia will also have a dedicated e-mail address to receive inquiries from any interested stakeholder and will be responding to those inquiries.

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

At the present time, Columbia anticipates installation of the proposed pipeline near and across The Ohio State University property to begin around April 2025 and to complete this work by December 31, 2025. Columbia expects construction to begin near and around Upper Arlington in the spring of 2026 and to complete this work by December 31, 2026. These timeframes and scope of work are subject to change based on evolving project planning and other variables, and Columbia will work with The Ohio State University, Upper Arlington, and affected residents throughout the construction process.

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

Attachment B is comprised of the pipeline alignment drawings and the pipeline workspace drawings that contain area maps at a 1"= 40' scale. The maps and drawing depict the Project centerline, workspaces, railroads, and major street crossings. The Project centerline is shown as a dashed red line, and workspaces are shown as cyan-hatched areas bounded by dashed black lines for workspace within public right-of-way; grey-hatched areas bounded by dashed blue lines for permanent easement within private parcels; and pink-hatched areas bounded by dashed black lines for temporary easement within private parcels. Roads, streets, highways, and other crossings are clearly labeled throughout.

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

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

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

As of the date of this filing, Columbia has been working to secure an easement with The Ohio State University (through the State of Ohio) for the use of its private property and will not begin construction until all easements 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 Project will be tested such that it will have an MAOP of 720 pounds per square inch gauge (“psig”). Columbia will be installing 12-inch, 16-inch, and 20-inch main-line piping that is coated steel with a wall thickness of 0.375 inches.

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

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

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

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

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

(c) The estimated capital cost of the project.

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

(10) Social and Ecological Impacts of the Project.

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

The Project is located within the Cities of Columbus and Upper Arlington, Franklin County, Ohio. The current land use along the route is comprised of residential and commercial properties, with approximately 0.46-mile-long section of the route traversing wooded and agricultural land associated with The Ohio State University. There are also transportation-related land use areas including one railroad crossing and several road crossings.

Currently, the route has 1,034 structures within 1,000 feet of the centerline. Five schools or daycares, and one place of worship were identified based on desktop analysis.

There are no new planned residential developments within the Project study corridor that were discovered as part of the survey. The Project is not expected to significantly impact existing or planned land use within the vicinity of the Project. There are no federal lands that will be crossed by the Project. There are state-owned lands crossed by this Project, which is the portion that crosses The Ohio State University.

The municipalities, townships, and counties affected include Franklin County, Clinton Township, Perry Township, the City of Upper Arlington, and the City of Columbus.

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

No Agricultural District Land parcels are impacted by the Project.

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

Colliers Engineering & Design (CED), on behalf of Columbia, conducted a Phase I intensive level cultural resource survey for the new construction of approximately 2.4 miles (3.9 kilometers [km]) of 12-inch, 16-inch, and 20-inch below ground high pressure natural gas pipeline for the Project. The purpose of the intensive cultural resource survey was to identify archaeological resources and/or historic structures that might be affected by the Project.

The investigation was performed for compliance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108). The Ohio State Historic Preservation Office (SHPO) is the official agency of the State of Ohio which was designated the Ohio History Connection (OHC) in 1967. This report conforms to the Ohio History Connection's Archaeology Guidelines (2022) and Guidelines for Conducting History/Architecture Surveys in Ohio (2014), the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 Federal Register 44716) and Ohio Revised Code Section 149.53, and Archaeological and Historic Survey and Salvage Work (2015). CED personnel who conducted the research and fieldwork meet or exceed the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 Federal Register 44716).

Prior to fieldwork, a background literature and records review was conducted. Then an intensive survey consisting of pedestrian survey with shovel testing and photographic documentation was performed.

The Area of Potential Effects (APE) is the geographic area within which the project may directly or indirectly alter the character or use of historic properties, including archaeological sites, above-ground historic resources, and properties listed or eligible for listing in the National Register of Historic Places (NRHP) ([per 36 CFR 800.4(d)(1)]). The Area of Potential Effects (Project APE) includes all areas directly and indirectly affected by the Project with the limit of ground disturbance. For the archaeological and architectural survey this includes all potential areas subject to ground disturbing activities (direct APE), and for the architectural survey this includes all potential historic structures within a 0.5-mile (0.8-km) radius of any ground disturbing activities.

As proposed, the direct APE consists of a combined total area of 15.2 acres (6.2 hectares). The background literature and records review completed by CED found that no archaeological or historic architectural resources were located within or immediately adjacent to the direct APE. Eighteen archaeological sites and ten above-ground historic resources were determined to be located within

0.5 mile (0.8 km) of the direct APE. The survey documented a heavily disturbed setting dominated by agricultural activity and urban construction fill. Based on the results of the survey and the extent of the Project activities, no intact, significant cultural resources will be affected by construction within the Project APE. In accordance with Section 106 of the NHPA, and the guidelines set forth by OHC, CED recommends a finding of “No Historic Properties Affected” [per 36 CFR 800.4(d)(1)] within the Project APE.

A copy of the Cultural Report, including the follow up Phase I cultural resources investigation, and correspondence with SHPO is included in Attachment G.

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

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

City of Upper Arlington	
Ukeme Awakessien Jeter	Heidi Munc
City of Upper Arlington Council President / Mayor	City of Upper Arlington Council
3600 Tremont Rd	3600 Tremont Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5040	614-583-5040
Brian C. Close	John J Kulewicz
City of Upper Arlington Council Vice President	City of Upper Arlington Council
3600 Tremont Rd	3600 Tremont Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5040	614-583-5040
Kathy Adams	Jim Lynch
City of Upper Arlington Council	City of Upper Arlington Council
3600 Tremont Rd	3600 Tremont Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5040	614-583-5040
Todd Walter	Krystal Gonchar
City of Upper Arlington Council	City of Upper Arlington City Clerk
3600 Tremont Rd	3600 Tremont Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5040	614-583-5040
August Polen	Steven Schoeny
City of Upper Arlington Deputy Clerk of Courts	City of Upper Arlington City Manager
3600 Tremont Rd	3600 Tremont Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5060	614-583-5040
Chad Gibson	Aaron Scott
City of Upper Arlington Community Development	City of Upper Arlington Engineering Division
3600 Tremont Rd	4100 Roberts Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5074	614-583-5351

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

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

Clinton Township	
Jessica Jessberger	Rebecca Grimm
Clinton Township Trustee	Clinton Township Trustee
3820 Cleveland Avenue	3820 Cleveland Avenue
Columbus, Ohio 43224	Columbus, Ohio 43224
614-257-7433	614-361-2732
David Clark	
Clinton Township Trustee	
3820 Cleveland Avenue	
Columbus, Ohio 43224	
614-499-8803	

Perry Township	
Chet J. Chaney	Andy English
Perry Township Trustee	Perry Township Trustee
7125 Sawmill Road	7125 Sawmill Road
Dublin, OH 43016	Dublin, OH 43016
614-889-2669	614-889-2669
James Roper	
Perry Township Trustee	
7125 Sawmill Road	
Dublin, OH 43016	
614-889-2669	

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

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

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

An Information for Planning and Consultation (IPaC) Official Species List was completed on May 26, 2023, on the USFWS website (<https://ipac.ecosphere.fws.gov/>). The USFWS Official Species Listed yielded three federally listed species, which include the Indiana bat (endangered), northern long-eared bat (endangered), and rayed bean (endangered). For the full Threatened and Endangered species memorandum, please see Attachment E.

A project review request letter was submitted to ODNR on May 26, 2023, seeking review of the potential impacts of the Project on federal and state listed species and their habitats within the Project area. A response was provided by ODNR on June 28, 2023, which identifies nine State-listed species that occur within one mile of the Project limits: Lark sparrow (*Chondestes grammacus*, Endangered), Yellow-crowned night-heron (*Nyctanassa violacea*, Special Interest), Purple wartyback (*Cyclonaias tuberculata*, Species of Concern), Elktoe (*Alasmidonta marginata*, Species of Concern), Wavy-rayed lampmussel (*Lampsilis fasciola*, Species of Concern), Black sandshell (*Ligumia recta*, Species of Concern), Round pigtoe (*Pleurobema sintoxia*, Species of Concern), Kidneyshell (*Ptychobranthus fasciolaris*, Species of Concern), and Rayed bean (*Villosa fabalis*, Endangered, Federally Endangered). Note: these species are not specifically recorded within the Project area itself. Due to the ongoing nature of the Project, an updated list was requested on May 24, 2024 and a response was received on June 26, 2024. No additional species were identified in the updated list provided by the ODNR.

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 Project corridor is urban and primarily consists of residential and commercial areas with maintained lawn. Approximately 19% of forested habitat are also present within the Project area. During the wetland delineation study, an on-site habitat assessment was performed to identify potential habitat for federally and state protected species within the Project area. Common tree species observed within the Project area during the study include sweetgum (*Liquidambar styraciflua*), loblolly pine (*Pinus taeda*), red maple (*Acer rubrum*), and American beech (*Fagus grandifolia*). Please see the pipeline alignment and workspace drawings in Attachment B for impacted locations of forested habitat. In addition, Columbia will adhere to seasonal tree clearing timeframes recommended by both USFWS and ODNR. The Project will result in a brush and tree clearing and trimming 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. In addition, two streams and one wetland feature have been delineated within the Project area that will be crossed by the proposed pipeline.

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

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

findings of the investigation, and a copy of any document produced as a result of the investigation.

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

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) were reviewed to identify any flood hazard areas that have been mapped for the proposed pipeline route. Specifically, map numbers 39049C0164K, 39049C0168K, and 39049C0169K encompass the area of the Project and were reviewed. The FEMA FIRM identified a regulated floodplain west of the Project, associated with the Scioto River and a regulated floodplain east of the Project, associated with the Olentangy River. The Project does not cross any mapped floodplain areas. A copy of the aerial map with FEMA floodplain and floodway information for the Project area is included as Figure 4 in the Wetland Delineation Report located in Attachment C.

The Project Study Area is comprised of a 100-foot-wide survey corridor centered on the proposed pipeline alignment for 2.4 miles. The Project Study Area or “Survey Corridor” includes the proposed installation of 2.4 miles of 12-inch, 16-inch, and 20-inch pipeline and additional workspaces. The additional workspaces are located along the alignment in the central and eastern end of the alignment. The Survey Corridor was investigated to identify potential jurisdictional Waters of the U.S. (WOTUS) and wetlands subject to Federal or State regulatory jurisdiction. The delineation methodologies developed by the USACE and the USEPA, as described in the 1987 Corps of Engineers Wetlands Delineation Manual, Technical Report Y-87-1 and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region (Version 2.0) and the subsequently issued USACE regulatory guidance regarding the identification of jurisdictional stream channels through the recognition of field indicators of an ordinary high-water mark within drainage features (Environmental Laboratory, 1987; USACE 2012; USACE 2005) were utilized during our investigation. The location and size of jurisdictional areas

delineated are shown on Figure 5, Delineation Results, in the Wetland Delineation Report located in Attachment C.

Based on the field investigations, two stream features and one wetland feature were delineated within the Survey Corridor by CED on March 2 and 3, 2022 and May 19, 2023. A total of 2,552 linear feet of perennial (R3) stream, 562 linear feet of intermittent (R4) stream, and 0.23 acres of palustrine emergent (PEM) wetland were delineated. It is CED's professional opinion that Stream Features "1" and "2", and the proximal wetland, are considered jurisdictional WOTUS since they drain into the Olentangy River and Scioto River. While disturbances to such features during construction will be kept to a minimum, a Pre-Construction Notification will be submitted to the U.S. Army Corps of Engineers Huntington District for verification of the eligibility of the proposed temporary disturbances to presumed jurisdictional WOTUS features under Nationwide Permit 12.

Impacts to vegetation along the proposed pipeline route will be minimal. Tree clearing and trimming will occur along the pipeline route as needed for safe construction and pipeline operation purposes along the public right-of-way as well as for permanent and temporary easement areas. Common tree species observed within the Project area include sweetgum, loblolly pine, red maple, and American beech. Maintained lawn habitat that will be impacted by the proposed Project includes common upland species such as white clover (*Trifolium repense*), tall fescue (*Schedonorus arundinaceus*), yellow sweet clover (*Melotius officinalis*), and dandelion (*Taraxacum officinale*).

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

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

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

Respectfully submitted,

/s/ John Ryan