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Columbus, Ohio 43215  
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September 24, 2025

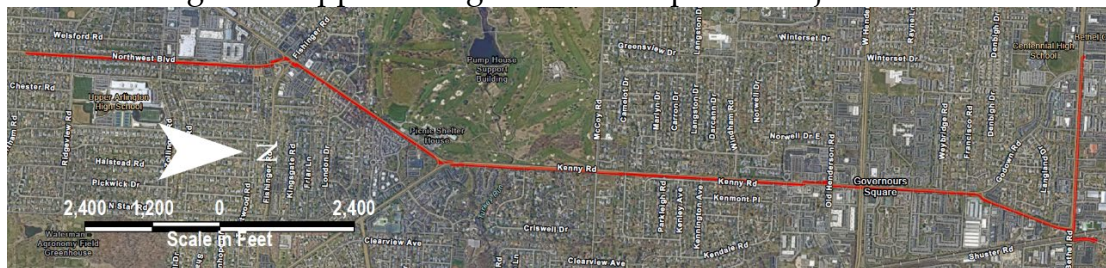
Ms. Tanowa Troupe  
Secretary, Office of Administration  
Ohio Power Siting Board  
180 East Broad Street  
Columbus, Ohio 43215

**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 Upper Arlington NCHP Pipeline Replacement Project*  
**OPSB Case No. 25-0890-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 the proposed pipeline project known as the Upper Arlington NCHP Pipeline Project (the "Project").

Figure 1: Upper Arlington NCHP Pipeline Project Route.



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

**(B) General Information**

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

Columbia is proposing to construct the Project within the City of Upper Arlington, the City of Columbus, Perry Township, and Franklin County. The Project will be approximately 24,288 feet (4.60 miles) in length and consist 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") rule changes in 49 C.F.R. 191 and 192, commonly referred to as the "PHMSA Mega Rule."

Much of the pipeline will be constructed within the public road right-of-way within the City of Upper Arlington, City of Columbus, Perry Township, and Franklin County as well as within permanent private pipeline easements from seven property owners as listed in **Attachment C**. Columbia plans to utilize a combination of conventional boring and open cut installation methods to construct the Project. If any new information is discovered, or for commercially reasonable reasons, Columbia may utilize the conventional boring, horizontal directional drilling (HDD), and open cut installation methods interchangeably during construction of the Project. The Inadvertent Release Plan is included as **Attachment F**. The Project location is shown on figures in **Attachment A**.

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

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

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

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

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**, Figure 2 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 limits of disturbance are indicated by a black line. The Project Route, currently shown to be the red line, may be shifted within the Limits of Disturbance (LOD) identified in **Attachment A** and in conformance with any/all permitting restrictions imposed by the Cities of Upper Arlington and Columbus (or relevant municipality). The existing NCHP pipeline that will be replaced is the yellow line.

**(4) The alternatives considered and reasons why the proposed location or route is best suited for the proposed facility, 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, locations of existing gas distribution facilities where services

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

must be maintained, private property, the density of below-grade utilities, impact to the public, and environmental features. The proposed route minimizes the number of residential homes and businesses directly affected by the Project. Installation methods have been selected to further limit impact to high traffic roads, other infrastructure such as railroads, environmental features, and trees. Tree clearing and trimming will occur along the pipeline route as needed for safe construction and pipeline operation purposes along the public right-of-way as well as for permanent and temporary easement areas. The route has 3,950 structures within 1,000 feet of the centerline, two of which are schools or daycares, and three are places of worship. For details on the cultural study, please see **Attachment E** regarding SHPO correspondence.

**(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 is planning to host a community meeting on November 3, 2025, at 5:00 pm at the City of Upper Arlington Public Library. Columbia will also be hosting a website dedicated to the Project, which is [www.columbiagasohio.com/upper-arlington-nchp](http://www.columbiagasohio.com/upper-arlington-nchp). Columbia will have a dedicated e-mail address to receive inquiries from any interested stakeholder and will be responding to those inquiries.

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

At the present time, Columbia anticipates installation of the proposed pipeline to begin around January 2026 with an in-service date of November 2026. Columbia also anticipates clearing trees within seasonal cutting dates of October 1<sup>st</sup> and March 31<sup>st</sup>. Columbia will work with the City of Upper Arlington, City of Columbus, Perry Township, Franklin County, and affected residents throughout the construction process. Columbia has engaged with the City of Upper Arlington on the schedule and plans to complete construction on Northwest Blvd. prior to an upcoming curb-to-curb replacement project that will result in a five-year moratorium in road construction in that area.

**(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 A**, Figure 1 is an area map at a 1" = 1,500' scale that depicts the centerline in red, parcel boundaries in yellow, and proposed limits of disturbance in black. The Project Route, currently shown to be the red line, may be shifted within the Limits of Disturbance (LOD) identified in **Attachment A** and in conformance with any/all permitting restrictions imposed by the Cities of Upper Arlington and Columbus (or relevant municipality).

**(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 is included in **Attachment C**.

All necessary easements are in the process of being secured as of the date of this filing. Columbia may procure additional temporary easements for the purposes of temporary access and/or workspace as needed.

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

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

The Project will be tested such that it will have an MAOP of 720 pounds per square inch gauge ("psig"). Columbia will be installing 20-inch main-line piping that is coated steel with a wall thickness of 0.375 inches. With the exception of the easements regarding affected owners in **Attachment C**, most of the workspace will be limited to the road right-of-way.

**(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 City of Upper Arlington, the City of Columbus, and Perry Township, Franklin County, Ohio. The current land use along the route is comprised of mostly residential and commercial properties. There are also transportation-related land use areas including several road crossings.

Currently, the route has 3,950 structures within 1,000 feet of the centerline. Two schools or daycares, and three places of worship were identified based on desktop analysis.

There are no new planned residential developments within the Project study corridor that were discovered as part of the survey. The Project is not expected to significantly impact existing or planned land use within the vicinity of the Project. There are no federal lands that will be crossed by the Project.

The municipalities, townships, and counties affected include Franklin County, 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 land or agricultural district land parcels are impacted by the Project.

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

On April 24, 2025, data was retrieved from the Ohio State Historic Preservation Office (SHPO) Online Mapping System (OMS) for the Project. The desktop review of the 4.6-mile pipeline corridor determined that there was a total of six (6) cemeteries, 29 Ohio Archaeological Inventory (OAI) sites, 84 Ohio Historic Inventory (OHI) above-ground resources, two (2) National Register of Historic Places properties and districts, and five (5) previously surveyed areas were identified within the 1.0-mile study area. One of these surveys partially overlaps the current project area. Additionally, one OHI is within the project area but will not be impacted by the proposed project. A Project review request letter was submitted to the Ohio State Historic Preservation Office (SHPO) on May 29, 2025, and Project comments were received from the Ohio SHPO on June 30, 2025. SHPO has determined that the Project has low potential to encounter intact, significant archeological deposits, and will have no effect on historic properties.

A copy of the SHPO correspondence is included in **Attachment E**.

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

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

Franklin County	
Kevin L. Boyce	Erica C. Crawley
Franklin County Commissioner	Franklin County Commissioner
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
Adam W. Fowler, P.E., P.S.	
Franklin County Engineer	
970 Dublin Road	
Columbus, Ohio 43215	
614-525-3030	

Perry Township	
Andy English	James Roper
Board of Trustees Chair	Board of Trustees Vice Chair
Zoning & facilities liaison	Police & fire liaison
7125 Sawmill Road	7125 Sawmill Road
Dublin, Ohio 43016	Dublin, Ohio 43016
614-889-2669	614-889-2669
Chet Chaney	Michele Elliott
Board of Trustees	Fiscal Officer
Road, cemeteries, utilities, and trash liaison	7125 Sawmill Road
7125 Sawmill Road	Dublin, Ohio 43016
Dublin, Ohio 43016	614-889-2669
614-889-2669	



Upper Arlington	
Ukeme Awakessien Jeter	Brian C. Close
City Council President	City Council Vice President
3600 Tremont Rd.	3600 Tremont Rd.
Upper Arlington OH 43221	Upper Arlington OH 43221
614-285-7258	614-227-4209
Kathy Adams	Todd Walter
City Council Member	City Council Member
3600 Tremont Rd.	3600 Tremont Rd.
Upper Arlington OH 43221	Upper Arlington OH 43221
614-558-1820	614-583-5030
John J. Kulewicz	Jim Lynch
City Council Member	City Council Member
3600 Tremont Rd.	3600 Tremont Rd.
Upper Arlington OH 43221	Upper Arlington OH 43221
614-364-5456	614-832-7295
Heidi Munc	Krystal Gonchar
City Council Member	City Clerk
3600 Tremont Rd.	3600 Tremont Rd.
Upper Arlington OH 43221	Upper Arlington OH 43221
614-371-2644	614-583-5030
Chad Gibson	Tony Moore
Community Development Director	Public Works Manager
3600 Tremont Rd.	4100 Roberts Rd.
Upper Arlington OH 43221	Columbus, OH 43228
614-583-5070	614-583-5350
Aaron Scott	
City Engineer	
4100 Roberts Rd.	
Columbus, OH 43228	
614-583-5360	

City of Columbus	
Hon. Andrew J. Ginther	Shannon G. Hardin
City of Columbus Mayor	Council President – District 9
90 W. Broad Street	90 W. Broad Street
Columbus, Ohio 43215	Columbus, Ohio 43215
614-645-7671	(614) 645-7380
Rob Dorans	Nicholas J. Bankston
Council President Pro Tem – District 3	Councilmember - District 5
90 W. Broad Street	90 W. Broad Street
Columbus, Ohio 43215	Columbus, Ohio 43215
(614) 645-7380	(614) 645-7380
Lourdes Barroso de Padilla	Nancy Day-Achauer
Councilmember - District 8	Councilmember - District 2
90 W. Broad Street	90 W. Broad Street
Columbus, Ohio 43215	Columbus, Ohio 43215
(614) 645-7380	(614) 645-7380
Otto Beatty	Melissa Green
Councilmember - District 7	Councilmember - District 6
90 W. Broad Street	90 W. Broad Street
Columbus, Ohio 43215	Columbus, Ohio 43215
(614) 645-7380	(614) 645-7380
Emmanuel V. Remy	Christopher L. Wyche
Councilmember - District 4	Councilmember - District 1
90 W. Broad Street	90 W. Broad Street
Columbus, Ohio 43215	Columbus, Ohio 43215
(614) 645-7380	(614) 645-7380
Charmaine Chambers	Toya Johnson
Deputy City Clerk	City Clerk
90 W. Broad Street	90 W. Broad Street
Columbus, Ohio 43215	Columbus, Ohio 43215
(614) 645-6553	(614) 645-3377

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. Fish & Wildlife Service (USFWS) Ohio Ecological Field Office Section 7 Informal 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; SWPPP Review (CC Plan);
- City of Upper Arlington ROW Permit and Stormwater Management Permit;
- Ohio EPA Hydrostatic Test Water Discharge Permit;
- Ohio Department of Transportation Right-of-Way and Utility Permit;
- CSX Railroad Permitting; and
- Franklin County Utility Permit.

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

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

expected to occur within the Project Study Area. The table below provides the USFWS IPaC Species List for the Project Study Area.

Table 1. USFWS IPaC Species List for Project Study Area		
Common Name	Scientific Name	Status
Insects		
Monarch Butterfly	<i>Danaus plexippus</i>	Potentially Threatened
Mammals		
Indiana Bat	<i>Myotis sodalis</i>	Federally Endangered
Northern Long-eared Bat	<i>Myotis septentrionalis</i>	Federally Endangered
Tricolored Bat	<i>Perimyotis subflavus</i>	Proposed Endangered
Clams		
Clubshell	<i>Pleurobema clava</i>	Federally Endangered
Northern Riffleshell	<i>Epioblasma rangiana</i>	Federally Endangered
Rayed Bean	<i>Villosa fabalis</i>	Federally Endangered
Salamander Mussel	<i>Simpsonaias ambigua</i>	Proposed Endangered

In addition to the review of federal databases, a review was conducted of the Ohio Department of Natural Resources (ODNR) web page regarding natural heritage resources surrounding the Project Study Area. The ODNR provides results of potential occurrences of rare species, natural communities, and federally listed species that have been documented within the immediate vicinity of the Project Study Area. Table 2 lists species that, as of June 30, 2025, potentially occur in Franklin County.

Table 2. ODNR Franklin County Species List as of June 30, 2025			
Common Name	Scientific Name	State Status	Federal Status
Birds			
Green-winged Teal	<i>Anas crecca</i>	Special Interest	-
Sandhill Crane	<i>Antigone canadensis</i>	Threatened	-
Great Egret	<i>Ardea alba</i>	Species of Concern	-
Upland Sandpiper	<i>Bartramia longicauda</i>	Endangered	-
American Bittern	<i>Botaurus lentiginosus</i>	Endangered	-
Lark Sparrow	<i>Chondestes grammacus</i>	Endangered	-
Least Bittern	<i>Ixobrychus exilis</i>	Threatened	-
Yellow-crowned Night-heron	<i>Nyctanassa violacea</i>	Special Interest	-
Prothonotary Warbler	<i>Protonotaria citrea</i>	Species of Concern	-
Barn Owl	<i>Tyto furcata</i>	Threatened	-
Golden-winged Warbler	<i>Vermivora chrysoptera</i>	Special Interest	-

Insects			
Lyre-tipped Spreadwing	<i>Lestes unguiculatus</i>	Species of Concern	-
Eastern Ringtail	<i>Erpetogomphus designatus</i>	Species of Concern	-
Stygian Shadowdragon	<i>Neurocordulia yamaskanensis</i>	Endangered	-
Fish			
Lake Chubsucker	<i>Erimyzon sucetta</i>	Threatened	-
Muskellunge	<i>Esox masquinongy</i>	Species of Concern	-
Iowa Darter	<i>Etheostoma exile</i>	Endangered	-
Spotted Darter	<i>Etheostoma maculatum</i>	Endangered	-
Tippecanoe Darter	<i>Etheostoma tippecanoe</i>	Species of Concern	-
Shortnose Gar	<i>Lepisosteus platostomus</i>	Endangered	-
Blacknose Shiner	<i>Notropis heterolepis</i>	Endangered	-
Paddlefish	<i>Polyodon spathula</i>	Threatened	-
Clams/Mollusk			
Elktoe	<i>Alasmidonta marginata</i>	Species of Concern	-
Slippershell Mussel	<i>Alasmidonta viridis</i>	Threatened	-
Purple Wartyback	<i>Cyclonaias tuberculata</i>	Species of Concern	-
Elephant-ear	<i>Elliptio crassidens</i>	Endangered	-
Northern Riffleshell	<i>Epioblasma rangiana</i>	Endangered	-
Snuffbox	<i>Epioblasma triquetra</i>	Endangered	Endangered
Wavy-rayed Lampmussel	<i>Lampsilis fasciola</i>	Species of Concern	-
Pocketbook	<i>Lampsilis ovata</i>	Endangered	-
Creek Heelsplitter	<i>Lasmigona compressa</i>	Species of Concern	-
Black Sandshell	<i>Ligumia recta</i>	Species of Concern	-
Washboard	<i>Megalanaia nervosa</i>	Endangered	-
Threehorn Wartyback	<i>Obliquaria reflexa</i>	Species of Concern	-
Round Hickorynut	<i>Obovaria subrotunda</i>	Threatened	-
Table 2 Continued. ODNR Franklin County Species List as of June 30, 2025			
Common Name	Scientific Name	State Status	Federal Status
Clams/Mollusk (Continued)			
Clubshell	<i>Pleurobema clava</i>	Endangered	Endangered
Round Pigtoe	<i>Pleurobema sintoxia</i>	Species of Concern	-
Kidneyshell	<i>Ptychobranhus fasciolaris</i>	Species of Concern	-
Salamander Mussel	<i>Simpsonia ambigua</i>	Threatened	-
Rabbitsfoot	<i>Theliderma cylindrica</i>	Endangered	Threatened
Fawnsfoot	<i>Truncilla donaciformis</i>	Species of Concern	-
Deertoe	<i>Truncilla truncata</i>	Species of Concern	-
Pondhorn	<i>Unio merus tetralasmus</i>	Threatened	-
Rayed Bean	<i>Villosa fabalis</i>	Endangered	Endangered
Rainbow	<i>Villosa iris</i>	Species of Concern	-
Reptiles/Amphibians			

Smooth Greensnake	<i>Opheodrys vernalis</i>	Endangered	-
Queensnake	<i>Regina septemvittata</i>	Species of Concern	-
Blanchard's Cricket Frog	<i>Acris blanchardi</i>	Species of Concern	-
<b>Mammals</b>			
Deer Mouse	<i>Peromyscus maniculatus</i>	Species of Concern	-
American Badger	<i>Taxidea taxus</i>	Species of Concern	-
Indiana Bat	<i>Myotis sodalis</i>	Endangered	Endangered
Little Brown Bat	<i>Myotis lucifugus</i>	Endangered	-
Northern Long-eared Bat	<i>Myotis septentrionalis</i>	Endangered	Endangered
Tricolored Bat	<i>Perimyotis subflavus</i>	Endangered	-
<b>Flowering Plants</b>			
American Sweet-flag	<i>Acorus americanus</i>	Potentially Threatened	-
Gattinger's-foxglove	<i>Agalinis gattingeri</i>	Threatened	-
Spreading Rock Cress	<i>Arabis patens</i>	Endangered	-
Southern Hairy Rock Cress	<i>Arabis pycnocarpa</i> var. <i>adpressipilis</i>	Potentially Threatened	-
Prairie False Indigo	<i>Baptisia lacteal</i>	Potentially Threatened	-
Prairie Brome	<i>Bromus kalmii</i>	Potentially Threatened	-
Cypress-knee Sedge	<i>Carex decomposita</i>	Endangered	-
Tall Larkspur	<i>Delphinium exaltatum</i>	Potentially Threatened	-
Scaly Blazing-star	<i>Liatris squarrosa</i>	Potentially Threatened	-
Showy Goldenrod	<i>Solidago speciosa</i>	Threatened	-
<b>Table 2 Continued. ODNR Franklin County Species List as of June 30, 2025</b>			
<b>Common Name</b>	<b>Scientific Name</b>	<b>State Status</b>	<b>Federal Status</b>
<b>Flowering Plants (Continued)</b>			
Three-birds Orchid	<i>Triphora trianthophora</i>	Potentially Threatened	-
Abor Vitae	<i>Thuja occidentalis</i>	Potentially Threatened	-
Rock Elm	<i>Ulmus thomasii</i>	Potentially Threatened	-

A project review request letter was submitted to ODNR on May 13, 2025, 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 11, 2025, which identifies seven State-listed species that occur within one mile of the Project limits: American Sweet-flag (*Acorus americanus*, State Potentially Threatened), Lark sparrow (*Chondestes grammacus*,

Endangered), Elktoe (*Alasmodonta marginata*, Species of Concern), Eastern Ringtail (*Erpetogomphus* designates, Species of Concern), Wavy-rayed lampmussel (*Lampsilis fasciola*, Species of Concern), Round pigtoe (*Pleurobema sintoxia*, Species of Concern), and Kidneyshell (*Ptychobranhus fasciolaris*, Species of Concern).

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 June 27, 2025, and a response was received on July 28, 2025. Elktoe (*Alasmodonta marginata*, Species of Concern) has been added to the list provided by the ODNR.

In addition, Columbia will adhere to seasonal tree clearing timeframes recommended by both USFWS and ODNR as the Project will result in brush and tree clearing/trimming in the immediate habitat surrounding the Project area. By adhering to the timeframe referenced (tree cutting completed by March 31, 2026), 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, northern long-eared bat, or tricolored 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 have been delineated within the Project area. The pipeline is proposed within road ROW, and therefore, no impacts are proposed to occur to either of these streams.

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 two jurisdictional streams located within the Project area will not be impacted, and therefore, a USACE Nationwide Permit 12 (reporting or non-reporting) is not required. However, no tree clearing will occur on any portion of the Project area until OPSB permitting 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. 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 B**. Excerpts of **Attachment B** are below:

The Project consists of the installation of approximately 4.6 miles of 20-inch pipeline replacement.

Available background information was reviewed for the Project prior to conducting a site visit. This available background information included the 2023 U.S. Geological Survey (USGS) 7.5 minute topographic maps (Northwest Columbus, Ohio quadrangle), U.S. Fish & Wildlife Service (USFWS) National Wetlands Inventory (NWI) maps, National Agriculture Imagery Program (NAIP) aerial photography (2022), USGS National Hydrography Dataset (NHD), Federal Emergency Management Agency (FEMA) National Flood Hazard Layer (NHFL), and U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) 2019 Soil Survey Geographic (SSURGO) digital data for Franklin County, Ohio.

A wetland scientist completed a wetland delineation of the Survey Area on May 14 and June 20, 2025. The Survey Area included the areas where proposed Project activities would occur. The delineation was completed in accordance with the 1987 Corps of Engineers Wetlands Delineation Manual (1987 Manual) and the 2010 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region – Version 2.0 (Regional Supplement).

USGS NHD data depicts six streams crossing the Survey Area. This includes Turkey Run which has one mapped FEMA 100-year floodplain and floodway associated with the stream and is present in the Survey Area). Aerial imagery indicates the Survey Area consists of road right of way, commercial, and residential areas with some maintained grass and a few landscape trees.



Stream (S)01 or Turkey Run is a relatively permanent perennial stream. A total of 17 feet of S01 was delineated within the Survey Area. S01 was approximately 12.0 feet wide, had a bank height of 5.0 feet, and a depth to OHWM of 1.5 feet. It achieved a QHEI score of 53. Using professional judgement, S01 or Turkey Run flows offsite to the east into the Olentangy River and should be considered jurisdictional and a WOTUS.

S02 is a relatively permanent unnamed perennial stream. A total of 299 feet of S02 was delineated within the Survey Area. S01 was approximately 16.0 feet wide, had a bank height of 3.5 feet, and a depth to OHWM of 1.5 feet. It achieved a QHEI score of 54. Using professional judgement, flows offsite to the east into the Olentangy River and should be considered jurisdictional and a WOTUS.

The USFWS and ODNR responses recommend seasonal tree clearing during the approved timeframe of October 1<sup>st</sup> through March 31<sup>st</sup> to avoid adverse effects to the listed bat species. If seasonal tree clearing is not possible, a summer presence/absence survey and further agency coordination may be required. No in-water work is anticipated, and therefore no impacts will occur to listed mussel or fish species according to both the USFWS and ODNR. Also, the USFWS states that due to the Project size, location and type they do not anticipate adverse impacts to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat.

Upland habitat within the Survey Area consists primarily of maintained roadside within residential urban areas. Typical vegetation within this upland maintained habitat consists of Kentucky bluegrass (*Poa pratensis*).

**(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/ Melissa L. Thompson

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