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2026-02-02
Reference: US-PE-0257394_0000.005-002

Mr. Greg Marzano
NiSource Environmental
290 W. Nationwide Blvd.
Columbus, OH 43215

Subject: East Broad Street Relocation Project, City of Columbus, Jefferson Township, Franklin County, Ohio Ecological Survey Report

Dear Mr. Marzano

This report summarizes the results of the wetland and stream assessment and threatened and endangered species habitat assessment conducted by WSP USA Inc. (WSP), for Columbia Gas of Ohio's (Columbia Gas) proposed East Broad Street Relocation Project (Project) located in City of Columbus, Jefferson Township, Franklin County, Ohio. A Project Location Map is included as Figure 1 at the end of this report.

The Project includes abandoning approximately 500 feet of existing pipeline and the installation of 700 feet of new 2-inch and 12-inch coated steel high pressure pipeline via open cut to relocate lines for a City of Columbus roadway project. The Project is located within existing easements and road right-of-way. It is anticipated that this project will require an Ohio Power Siting Board filing, which will be filed by Columbia Gas.

Columbia Gas retained WSP to determine the boundaries and limits of streams, wetlands, and other aquatic resources at the site, as well as provide a qualitative assessment and opinion on potential jurisdiction of identified aquatic resources (based on current state and federal regulations), characterize existing site conditions, and review the Project for threatened and endangered species habitat. Field surveys were performed within a 0.84-acre survey area (Survey Area) along East Broad Street which includes an approximately 700- by 50-foot area along the edge of pavement. The findings and results of the on-site assessment are described below.

METHODOLOGY

Prior to the field survey, hydrologic resource mapping, including Federal Emergency Management Agency regulated floodplains, 3D Hydrography Program (3DHP) streams, and National Wetlands Inventory (NWI) data, are reviewed within the vicinity of survey areas. NWI riverine lines are typically excluded in order to review more comprehensive 3DHP streamlines.

A Global Positioning System capable of sub-meter accuracy is used to determine boundaries of all identified aquatic resources and other salient features. On-site evaluations are conducted during suitable conditions and avoided when conditions are unsafe or limit the ability to identify aquatic features (e.g., severe storms or accumulated snow). However, field surveys are conducted throughout the year when feasible and may occur during non-optimal conditions (e.g., rain or drought). The Antecedent Precipitation Tool was used to provide a standardized methodology for evaluating normal precipitation conditions in the Project area at the time of survey. This tool provides an assessment of the presence or absence of drought conditions, as well as the approximate dates of the wet and dry seasons, for a given location.

During field surveys, the Ohio Environmental Protection Agency's (OEPA's) Ohio Rapid Assessment Method is used to evaluate the quality and function of identified wetlands. The OEPA's *Headwater Habitat Evaluation Index* is used to assess streams with drainage areas less than 1.0 square mile or natural pool depths less than 40 centimeters, while the OEPA's Qualitative Habitat Evaluation Index is used to assess streams with drainage areas greater than 1.0 square mile or natural pool depths greater than 40 centimeters.

Wetlands are lands that have a predominance of hydric soils, hydrophytic vegetation, and prolonged soil saturation or inundation. Locations of wetland determination data points are selected in accordance with procedures outlined in the United States Army Corps of Engineers' (USACE's) *1987 Corps of Engineers Wetlands Delineation Manual* and the USACE's *2012 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region* (Version 2.0). Paired data points (i.e., one wetland data point [WDP] and one upland data point [UDP]) are collected for each wetland and any additional wetland components (i.e., Cowardin classifications). However, in some cases, one UDP may be used for multiple wetlands or wetland components if the UDP is in proximity to both features. Additional UDPs may be collected to document site conditions in areas considered to have potential for wetland development. Wetlands are classified, in accordance with the *Classification of Wetlands and Deepwater Habitats of the United States*, by identifying the dominant life form of the vegetation (i.e., > 30%) or the physiography and composition of the substrate.

Identification of streams are based on observations of defined bed and bank or other ordinary high-water mark (OHWM) indicators, as defined in the USACE *National Ordinary High-Water Mark Field Delineation Manual for Rivers and Streams* (Final Version, January 2025), and are classified in accordance with the USACE Jurisdictional Determination Form Instructional Guidebook. Stream extents are collected at the identified OHWM along each bank for channels averaging at or over four feet wide and along the thalweg for channels averaging under four feet wide. WSP biologists characterize the flow regime of identified streams based upon field observations and desktop review. Noted flow regimes are generally based on the following:

- Ephemeral streams are non-relatively permanent waters, which are precipitation dependent and carry water only during and immediately after periods of rainfall or snowmelt; and are characterized as having a well-defined channel with no significant habitat for aquatic fauna.
- Intermittent streams are relatively permanent (RPWs) that carry water for extended periods of time but cease to flow occasionally or seasonally during periods of low precipitation or drought. Signs of

seasonal flow include scouring, sediment deposits, undercut banks, and/or isolated pools that may support aquatic life.

- Perennial streams are RPWs that typically carry water throughout the year except during extreme drought. Pool depths may be deeper compared to intermittent streams and will often have evidence of aquatic fauna such as macroinvertebrates and fish.

Delineated wetland and stream resources are given an identifier based on the order of delineation in the field. For example, a wetland with the identifier “WET-01” equates to WET (wetland) -01 (number assigned to the first resource identified). Similarly, delineated streams are given the identifier STRM and numbered in a similar manner as wetlands. WDPs and associated UDPs are assigned the same identifier as the corresponding wetland. If WSP identified multiple wetland components (i.e., classification) for a feature, an additional identifier (-a, -b, etc.) is used for each component. Additional UDPs may be collected to document site conditions and at potentially suitable locations for wetland development based on field observations and/or desktop analysis, and are assigned a letter value (-A, -B, etc.) to indicate they are not associated with any potentially jurisdictional wetlands.

WSP’s professional opinion on the jurisdictional status of identified wetlands, streams, and other features is based upon the Pre-2015 Regulatory Regime consistent with the Sackett decision, which includes the United States Environmental Protection Agency (USEPA) pre-2015 definition of waters of the United States that was implemented consistent with case law and longstanding practice and modified due to the Sackett vs. the USEPA, which was decided by the United States Supreme Court on May 25, 2023. WSP considered the effects of the decision when examining waters and making recommendations on their jurisdictional status. Those recommended as USACE jurisdictional includes all waters with the potential to meet the relatively permanent standard (i.e., intermittent and perennial streams) and those wetlands that exhibit a continuous surface connection (e.g., stream) to an RPW that is connected to a Traditional Navigable Water.

The USEPA and USACE published a memorandum to the field between the USEPA and USACE, on March 12, 2025, outlining guidance for the revised interpretation of the term “continuous surface connection” in the implementation of the definition of waters of the United States. In the revised interpretation, discrete features (ditches, culverts, swales, etc.) would not meet the definition of a continuous surface connection. The USEPA and USACE subsequently published a Public Notice in the Federal Register (90 FR 13428) on March 24, 2025. WSP’s opinion on the jurisdictional status of identified aquatic features takes into account the guidance provided in the USEPA and USACE memorandum.

It is important to note that an official determination of the limits and jurisdictional status of on-site features is under the purview of the USACE and can only be made by the USACE or the USEPA. This may require an on-site inspection with USACE representatives to provide an official jurisdictional determination. Additionally, ephemeral streams are not regulated by the OEPA; however, wetlands determined to be isolated may be considered waters of the state and regulated by the OEPA.

RESULTS

Wetland and Stream Assessment

On December 30, 2025, WSP biologists performed on-site determinations to identify streams, wetlands, and other aquatic resources and assess existing habitat within the Survey Area. The Survey Area and field-collected resource locations and data points, as well as any 3DHP streams and waterbodies, regulated floodplains, and NWI wetlands are depicted in Figure 2, at the end of this report. NWI and 3DHP data, if present, have been excluded from the Survey Area in order to display the delineated aquatic resources.

Wetlands

WSP biologists did not observe any wetlands within the Survey Area (Figure 2). Results of the USACE Antecedent Precipitation Tool analysis are included in Appendix A.

Streams

WSP biologists did not observe any streams within the Survey Area (Figure 2).

Non-Jurisdictional Drainage Features

WSP biologists identified one stormwater ditch within the Survey Area (Figure 2). Based on field observations, the feature is likely not jurisdictional as it appears to have been excavated wholly in uplands and does not provide a connection from upslope aquatic resources to other downslope streams or wetlands. In addition, this feature lacks bed and bank and does not exhibit OHWM indicators; therefore, it is WSP's professional opinion that the feature is likely not regulated by the USACE or the state of Ohio. General representative photos of the ditch feature within the Survey Area have been provided in Appendix B.

Rare, Threatened, and Endangered Species Habitat Assessment

WSP submitted a United States Fish and Wildlife Service (USFWS) technical assistance letter and an Environmental Review request letter to the Ohio Department of Natural Resources (ODNR) requesting information on any known occurrences of federally or state-listed threatened or endangered species, or any areas of designated critical habitat, within a 0.5-mile radius of the Project on January 6, 2026.

WSP received a response from the USFWS on January 30, 2026, indicating that the proposed Project is in the range of the Indiana bat (*Myotis sodalis*), and northern long-eared bat (*Myotis septentrionalis*), both federally listed species. The USFWS indicated that summer habitat for Indiana bats consists of a wide variety of forested/wooded habitats where they roost, forage, and breed, which may include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. The USFWS recommended that tree clearing be avoided wherever possible and that the removal of any trees 3.0 inches or more in diameter at breast height only occur between October 1 and March 31. The USFWS also recommended avoiding and minimizing impacts on wetland habitats to the extent possible, to benefit water quality and fish and

wildlife habitat. In addition, the USFWS stated that the tricolored bat (*Perimyotis subflavus*) is proposed as endangered and conservation measures for the Indiana bat and northern long-eared bat will help conserve the tricolored bat.

Due to the proposed listing of the monarch butterfly (*Danaus plexippus*), the USFWS recommends disturbed areas be revegetated with native vegetation and limit mowing monarch butterfly habitat from March 15 to October 31 during the breeding and migration seasons. It is also recommended to avoid using pesticides and herbicides in and near monarch butterfly habitat.

The USFWS stated that due to the Project's type, size, and location, they do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Additionally, WSP received a response from the ODNR on January 28, 2026, providing several comments that are provided in Table 1. A copy of the agency responses are included in Appendix C.

During the on-site assessment for wetlands and streams, WSP biologists performed a cursory visual assessment of the Survey Area for any potential protected species habitat and rare or unique habitats. During the habitat assessment, WSP did not observe any habitat consistent with rare, threatened, or endangered species within the Survey Area. Additionally, no caves or mine portals were observed within the Survey Area, and a review of ODNR Mines of Ohio and Karst Interactive Map Viewers indicate no records of either within 0.25 mile of the Survey Area.

SUMMARY AND RECOMMENDATIONS

WSP biologists did not observe any streams or wetlands within the Survey Area.

One stormwater ditch was identified withing the Survey Area. Based on field observations and desktop reviews, this identified resource is likely considered non-jurisdictional by the USACE and the state of Ohio.

No trees were observed; as such, adverse impacts to bats are not anticipated. No other federally or state-listed species habitat was observed during the on-site assessment. Consultation with the USFWS is recommended if construction activities have not been completed prior to the potential federal listing of the tricolored bat or the monarch butterfly.

This report summarizes the results of the on-site determination conducted for streams, wetlands, and other aquatic resources and habitat assessment for the proposed East Broad Street Relocation Project. Information contained within this report reflects the professional opinion of WSP and is based upon methods accepted by the USACE to identify regulated wetlands and streams.

Sincerely,

Alice Burney
Intermediate Professional, Biologist

Attachments: Table 1 – Threatened and Endangered Species
Figure 1 – Project Location Map
Figure 2 – Delineation Map
Appendix A – USACE Antecedent Precipitation Tool Analysis
Appendix B – Representative Non-Jurisdictional Features Photographs
Appendix C – Agency Correspondence

Table 1 Threatened and Endangered Species Table

Common/ Scientific Names	State-Listed Status	Federally Listed Status	Typical Habitat Description[1]	Habitat Observed in Survey Area[2]	Agency Comment (Appendix D)	Potential Impacts and Avoidance Dates
Clubshell/ *Pleurobema clava*	E	E	Small to medium streams with gravel/sand substrate and relatively little silt.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Longsolid/ *Fusconaia subrotunda*	E	T	Small streams to large rivers, and prefers a mixture of sand, gravel, and cobble substrates.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable nesting habitat was not observed within the Survey Area.
Rayed Bean/ *Villosa fabalis*	E	E	Sand or gravel substrates within small, shallow, high-quality headwater creeks, riffles, and wave-swept shores of lakes.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Northern Riffleshell/ *Epioblasma torulosa rangiana*	CI	E	Swift, shallow, well-oxygenated riffles and runs in medium to large rivers and streams.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Salamander Mussel/ *Simpsonaias ambigua*	T	PE	Inhabits swift-flowing rivers and streams with areas of shelter under rocks or in crevices	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Purple Cat's Paw/ *Epioblasma obliquata*	E	E	Shallow waters with swift currents. Prefers sand to boulder substrates in medium to large rivers.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Snuffbox Mussel/ *Epioblasma triquetra*	E	E	Sand, gravel, or cobble substrates in swift small and medium-sized rivers as well as riffles and shoals of rocky rivers, and the shores of lakes with wave activity.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.

Common/ Scientific Names	State-Listed Status	Federally Listed Status	Typical Habitat Description[1]	Habitat Observed in Survey Area[2]	Agency Comment (Appendix D)	Potential Impacts and Avoidance Dates
Rabbitsfoot/ *Theliderma ovata*	E	T	Small to medium sized streams and some large rivers. Substrates include a mix of sand and gravel.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Elephant-Ear Mussel/ *Elliptio crassidens crassidens*	E	Not Listed	Primarily inhabits large rivers in mud, sand, or fine gravel.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Pocketbook Mussel/ *Lampsilis ovata*	E	Not Listed	Rivers, streams, and lake littoral zones, preferring substrates of sand, gravel or sandy mud in moderate to strong currents.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Round Hickorynut Mussel/ *Obovaria subrotunda*	T	T	Small streams to large rivers in a mix of sand, gravel and cobble stream bottoms.	No	USFWS: Due to the project, type, size, and location, USFWS does not anticipate adverse effects to this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Washboard Mussel/ *Megalonaias nervosa*	E	Not Listed	Main channels of large rivers and medium sized streams with slow moving currents. Substrates of sand, mud, or gravel preferred.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Ohio Pigtoe Mussel/ *Pleurobema cordatum*	E	Not Listed	Medium to large rivers with moderate to strong currents. They require high oxygen, and flowing water with stable sand, gravel, or cobble substrates.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Pondhorn Mussel/ *Uniomerus tetralasmus*	T	Not Listed	Slow moving or stagnant shallow waters including ponds, ditches, and small, low gradient streams.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Indiana bat/ *Myotis sodalis*	E	E	During the spring and summer (April 1 through September 30), this species' habitat consists of forested/wooded	No	ODNR/USFWS: Cutting of trees is recommended to occur between October 1 and March 31. If seasonal tree cutting is not possible, a mist net survey or acoustic survey	No; impacts are avoided as no trees or potential hibernacula

Common/ Scientific Names	State-Listed Status	Federally Listed Status	Typical Habitat Description[1]	Habitat Observed in Survey Area[2]	Agency Comment (Appendix D)	Potential Impacts and Avoidance Dates
			areas where they usually roost under loose tree bark on dead or dying trees. Winter hibernation habitat consists of caves or, occasionally, abandoned mines.		may be conducted by an approved surveyor between June 1 and August 15. ODNR - If a habitat assessment finds that potential hibernacula are present within 0.25 mile of the Survey Area, please send this information to Eileen Wyza, Eileen.Wyza@dnr.ohio.gov for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact this species.	were observed within the Survey Area.
Northern long-eared bat/ *Myotis septentrionalis*	E	E	During the spring and summer (April 1 through September 30), this species' habitat consists of forested/wooded areas where they usually roost under loose tree bark on dead or dying trees or in crevices and cavities of trees. Winter hibernation habitat consists of caves or, occasionally, abandoned mines.	No	ODNR/USFWS: Cutting of trees is recommended to occur between October 1 and March 31. If seasonal tree cutting is not possible, a mist net survey or acoustic survey may be conducted by an approved surveyor between June 1 and August 15. ODNR- If a habitat assessment finds that potential hibernacula are present within 0.25 mile of the Survey Area, please send this information to Eileen Wyza, Eileen.Wyza@dnr.ohio.gov for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact this species.	No; impacts are avoided as no trees or potential hibernacula were observed within the Survey Area.

Common/ Scientific Names	State-Listed Status	Federally Listed Status	Typical Habitat Description[1]	Habitat Observed in Survey Area[2]	Agency Comment (Appendix D)	Potential Impacts and Avoidance Dates
Little brown bat/ *Myotis lucifugus*	E	Not Listed	During the spring and summer (April 1 through September 30), this species' habitat consists of forested/wooded areas where they usually roost under loose tree bark on dead or dying trees or in cracks or crevices of trees. Winter hibernation habitat consists of caves or, occasionally, abandoned mines.	No	ODNR: Cutting of trees is recommended to occur between October 1 and March 31. If seasonal tree cutting is not possible, a mist net survey or acoustic survey may be conducted by an approved surveyor between June 1 and August 15. If a habitat assessment finds that potential hibernacula are present within 0.25 mile of the Survey Area, please send this information to Eileen Wyza, Eileen.Wyza@dnr.ohio.gov for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact this species.	No; impacts are avoided as no trees or potential hibernacula were observed within the Survey Area.
Tricolored bat/ *Perimyotis subflavus*	E	PE	During the spring and summer (April 1 through September 30), this species' habitat consists of forested/wooded areas where they usually roost under loose tree bark and among leaf clusters on dead or dying trees. Winter hibernation habitat consists of caves or, occasionally, abandoned mines.	No	ODNR: Cutting of trees is recommended to occur between October 1 and March 31. If seasonal tree cutting is not possible, a mist net survey or acoustic survey may be conducted by an approved surveyor between June 1 and August 15. If a habitat assessment finds that potential hibernacula are present within 0.25 mile of the Survey Area, please send this information to Eileen Wyza, Eileen.Wyza@dnr.ohio.gov for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact this species.	No; impacts are avoided as no trees or potential hibernacula were observed within the Survey Area.

Common/ Scientific Names	State-Listed Status	Federally Listed Status	Typical Habitat Description[1]	Habitat Observed in Survey Area[2]	Agency Comment (Appendix D)	Potential Impacts and Avoidance Dates
Monarch Butterfly/ *Danaus plexippus**	Not Listed	PT	Fields, roadside areas, open areas, or wet areas that support milkweed and flowering plants for food and egg laying. Overwintering habitat include moderate temperatures to avoid freezing.	No	USFWS: Due to the project, type, size, and location, USFWS does not anticipate adverse effects to this species.	Suitable foraging and migrating habitat may be present in areas not frequently mowed. Conservation measures, including avoidance dates, have not been provided by USFWS.
Goldeye/ *Hiodon alosoides*	E	Not Listed	Large, slow moving, turbid rivers and shallow lakes. Prefer silty backwaters and pools, and often spawn in rocky, gravelly, or firm shallow areas.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Shortnose Gar/ *Lepisosteus platostomus*	E	Not Listed	Warm, slow, and turbid waters in large rivers, oxbow lakes, and quiet pools. Shallow areas with abundant aquatic vegetation for cover and spawning.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Iowa Darter/ *Etheostoma exile*	E	Not Listed	Clear, shallow, slow waters with abundant aquatic vegetation. Lakes, ponds, marshes and quiet stream pools.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Spotted Darter/ *Etheostoma maculatum*	E	Not Listed	Large, clear, unpolluted streams and rivers. They favor deep, fast-slowing riffles with a substrate of large rocks, gravel, and boulders.	No	ODNR: DOW recommends no in-water work in perennial stream from March 15 through June 30. If no in-water work is proposed in a perennial stream, this project is not likely to impact this species.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Northern Brook Lamprey/ *Ichthyomyzon fossor*	E	Not Listed	Clean, permanent, medium sized streams and tributaries. Requires specific microhabitats including swift, gravel bottomed riffles, and soft, organic-rich, quitter side channels.	No	ODNR: Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size to provide suitable habitat, this project is not likely to impact this species	No, impacts are avoided as suitable habitat was not observed within the Survey Area.

Common/ Scientific Names	State-Listed Status	Federally Listed Status	Typical Habitat Description[1]	Habitat Observed in Survey Area[2]	Agency Comment (Appendix D)	Potential Impacts and Avoidance Dates
Tonguetied Minnow/ *Exoglossum laurae*	E	Not Listed	Cool, clear, small to medium streams and creeks. Prefers habitats with rubble, gravel or boulder substrates. They rely on forested banks and coverings.	No	ODNR: Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size to provide suitable habitat, this project is not likely to impact this species	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Popeye Shiner/ *Notropis ariommus*	E	Not Listed	Clear, warmwater streams, large creeks, and small rivers. Moderate gradients with gravel-cobble substrates preferred.	No	ODNR: If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Lake Chubsucker/ *Erimyson sucetta*	T	Not Listed	Shallow, still-waters such as vegetated lakes, ponds, and slow moving streams with organic substrates like sand or silt.	No	ODNR: If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.
Paddlefish/ *Polyodon spathula*	T	Not Listed	Deep pools, large, slow-moving rivers, and reservoirs. Require free-flowing water for feeding and clean, gravel-bottomed, fast- slowing water for spawning.	No	ODNR: If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31.	No, impacts are avoided as suitable habitat was not observed within the Survey Area.

Notes: Status Key: E=Endangered; T=Threatened, PE= Proposed Endangered , SC=Species of Concern, CI=Critically Imperiled, PT=Proposed Threatened.
[1] Habitat descriptions sourced from multiple resources, including ODNR, United States Forest Service, USFWS, Michigan Natural Features Inventory, and Illinois State Museum.
[2] Represents the opinion of POWER biologists based on site conditions at time that aquatic resources delineations were completed.
* The USFWS published into the Federal Register their proposal to list the monarch butterfly as threatened on December 12, 2024.

Figure 1 – Project Location Map

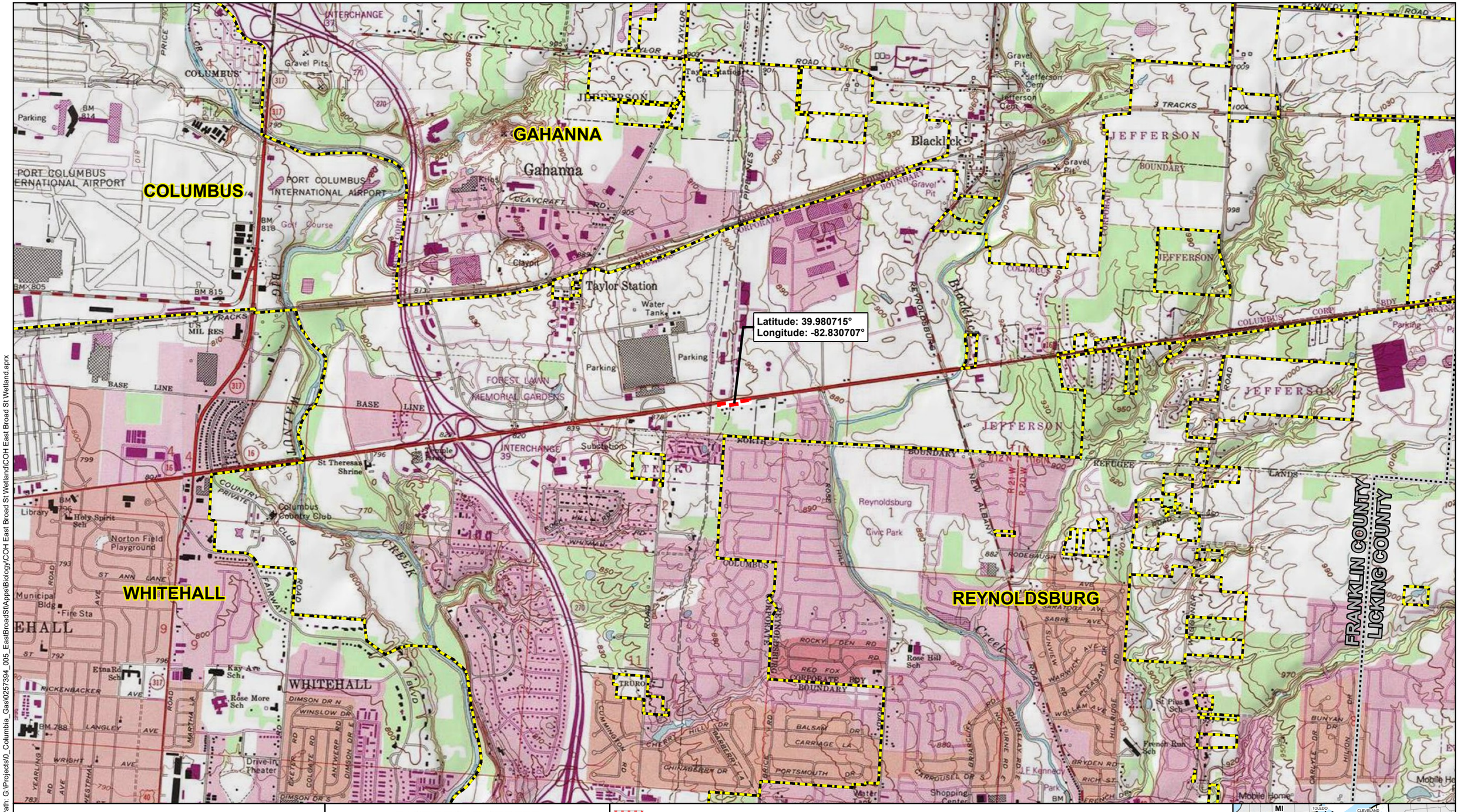

Figure 1 – Project Location Map

0 1,000 2,000 3,000 4,000

Feet

EAST BROAD STREET
RELOCATION PROJECT

Series Date: 1/7/2026	**Page: 1 of 1**
Map Rev: 1	**NAD 1983 2011 STATEPLANE OHIO NORTH FIPS 3401 FT US**

Franklin County, Ohio

Study Area
City Boundary
County Boundary

Date Saved: 1/7/2026 9:08 AM Path: G:\Projects\0_Columbia_Gas\0257394_005_EastBroadStAppsBiology\COH East Broad St Wetland.aprx

Figure 2 – Delineation Map

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Figure 2 – Delineation Map

0 50 100 150 200

Feet

EAST BROAD STREET
RELOCATION PROJECT

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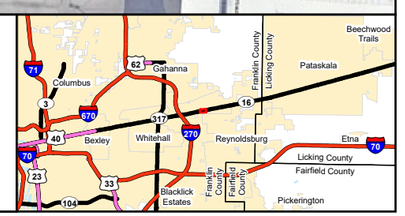
Map Rev: 1	**NAD 1983 2011 STATEPLANE OHIO NORTH FIPS 3401 FT US**

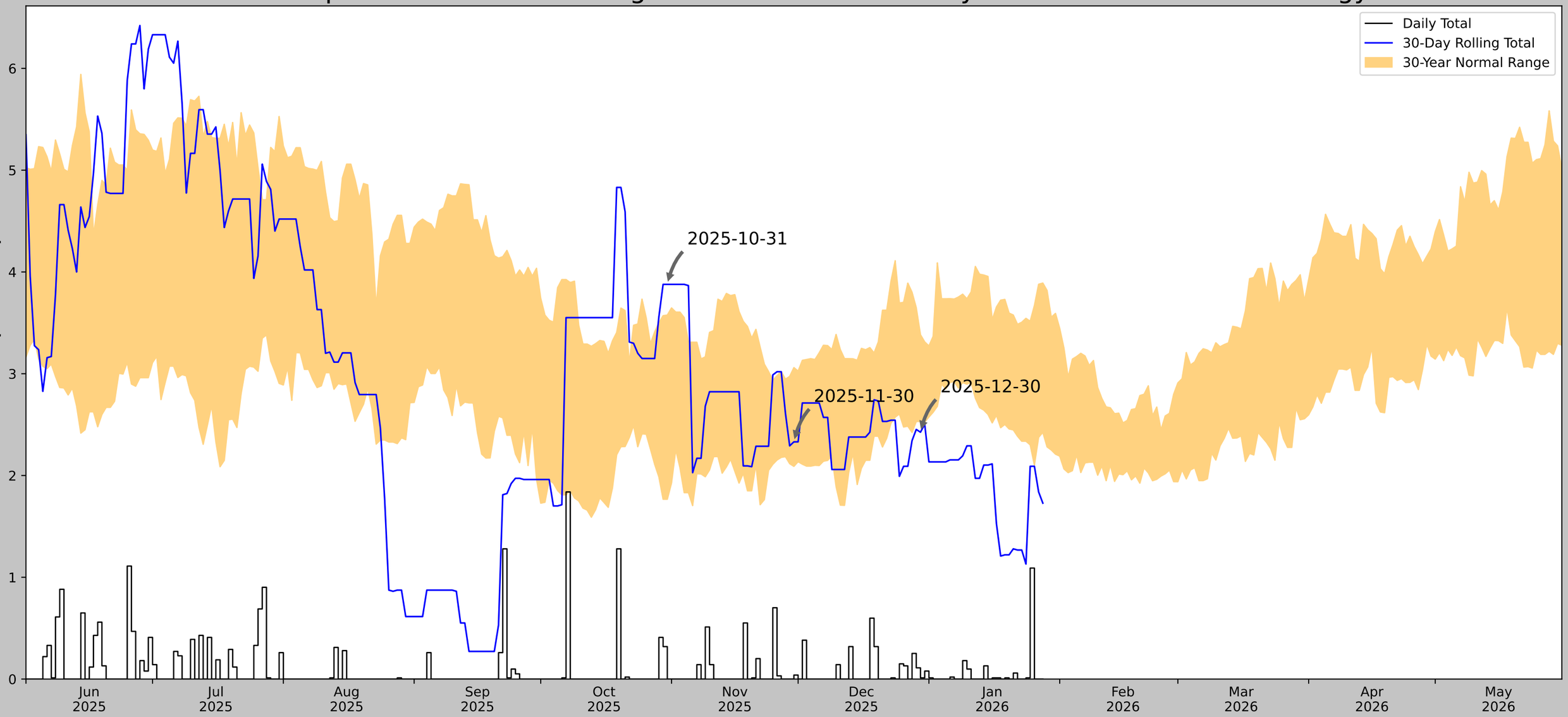
Franklin County, Ohio

- Gas - Proposed
- Gas - Retire
- Gas - Existing
- Study Area
- Catch Basin
- Existing Culvert
- Drainage
- Highway - State
- Local Road



Appendix A – USACE Antecedent Precipitation Tool Analysis

Antecedent Precipitation vs Normal Range based on NOAA's Daily Global Historical Climatology Network



Coordinates	39.98072, -82.83075
Observation Date	2025-12-30
Elevation (ft)	896.908
Drought Index (PDSI)	Mild drought
WebWIMP H_2O Balance	Wet Season

30 Days Ending	30^{th} %ile (in)	70^{th} %ile (in)	Observed (in)	Wetness Condition	Condition Value	Month Weight	Product
2025-12-30	2.530709	3.383465	2.425197	Dry	1	3	3
2025-11-30	2.089764	3.060236	2.330709	Normal	2	2	4
2025-10-31	1.766535	3.575984	3.877953	Wet	3	1	3
Result							Normal Conditions - 10

Figures and tables made by the
Antecedent Precipitation Tool
Version 3.0

US Army Corps of Engineers.
ERDC

Developed by:
U.S. Army Corps of Engineers and
U.S. Army Engineer Research and
Development Center

Weather Station Name	Coordinates	Elevation (ft)	Distance (mi)	Elevation Δ	Weighted Δ	Days Normal	Days Antecedent
JOHN GLENN INTL AP	39.9906, -82.8769	810.039	2.537	86.869	1.362	11353	90

Appendix B – Representative Non-Jurisdictional Features Photographs

Photographic Record of Aquatic Resources

Site Location: East Broad Street Relocation

Client Name: Columbia Gas

Date: December 30, 2025 **Description:** Representative Stormwater Ditch

Date: December 30, 2025 **Description:** Representative Culverts

Inlet

Outlet

Appendix C – Agency Correspondence

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / FAX (614) 416-8994

January 30, 2026

Project Code: 2026-0030474

Dear Mr. Ware:

The U.S. Fish and Wildlife Service (Service) has received your recent correspondence requesting information about the subject proposal. We offer the following comments and recommendations to assist you in minimizing and avoiding adverse impacts to threatened, endangered, and proposed species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA).

Federally Threatened and Endangered Species: The endangered Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and breed that may also include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. Roost trees for both species include live and standing dead trees ≥3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Bridges and culverts have also been used as roosts. Additionally, northern long-eared bats have been observed roosting in other human-made structures, such as buildings, barns, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves, rock crevices and abandoned mines.

Seasonal Restrictions for Federally Listed Bat Species: Should the proposed project site contain trees ≥3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥3 inches dbh cannot be avoided, we recommend removal of any trees ≥3 inches dbh only occur between October 1 and March 31. If bridges or culverts will be impacted, we recommend reviewing Appendix K in the most recent "Range-Wide Indiana Bat & Northern Long-Eared Bat Survey Guidelines" to determine if the bridge/culvert may be suitable roost habitat. We recommend impacts to suitable bridges and culverts only occur from October 1 and March 31. These seasonal restrictions are recommended to avoid adverse effects to Indiana bats and northern long-eared bats.

If implementation of this seasonal restriction on tree cutting and impacting suitable bridge/culvert roosts is not possible, a summer presence/absence survey may be conducted for Indiana bats and northern long-eared bats. If Indiana bats and northern long-eared bats are not detected during the survey, then tree clearing and impacts to bridge/culvert roosts may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

Federally Proposed Species: On September 14, 2022, the Service proposed to list the tricolored bat (*Perimyotis subflavus*) as endangered under the ESA. The bat faces extinction due to the impacts of white-nose syndrome, a deadly disease affecting cave-dwelling bats across the continent. During spring, summer, and fall, this species roosts primarily among leaf clusters of live or recently dead trees, emerging at dusk to hunt for insects over waterways and forest edges. While white-nose syndrome is by far the most serious threat to the tricolored bat, other threats now have an increased significance due to the dramatic decline in the species' population. These threats include disturbance to bats in roosting, foraging, commuting, and over-wintering habitats. Mortality due to collision with wind turbines, especially during migration, has also been documented across their range. Conservation measures for the Indiana bat and northern long-eared bat will also help to conserve the tricolored bat.

On December 12, 2024 the Service proposed to list the monarch butterfly (*Danaus plexippus plexippus*) as threatened under the ESA. Monarch butterflies are found throughout Ohio and some populations migrate vast distances across multiple generations each year. Many monarchs fly between the U.S., Mexico and Canada – a journey of over 3,000 miles. Monarch populations have declined significantly in recent years. Threats include habitat loss – particularly the loss of milkweed, the monarch caterpillar's sole food source – and mortality resulting from pesticide use. The Service recommends the following actions to maintain habitat and avoid impacts to monarchs in Ohio: revegetate disturbed areas with native plant species including nectar-producing plants and milkweed endemic to the area; limit mowing monarch habitat from March 15 to August 31 when monarchs are breeding and from September 1 to October 31 when large numbers of monarchs are migrating; and avoid the use of pesticides and herbicides in and near monarch habitat.

Section 7 Coordination: If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus is it important to conserve the functions and values of the remaining wetlands in Ohio (https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf). We recommend avoiding and minimizing project impacts to all wetland habitats (e.g., forests, streams, vernal pools) to the maximum extent possible in order to benefit water quality and fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the U.S. Army Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best

management practices should be used to minimize erosion, especially on slopes. Disturbed areas should be mulched and revegetated with native plant species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, coordination with the Service should be initiated to assess any potential impacts.

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, Environmental Services Administrator, at (614) 265-6387 or at mike.pettegrew@dnr.ohio.gov.

If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or ohio@fws.gov.

Sincerely,

Erin Knoll
Field Office Supervisor

cc: Matthew.Stooksbury@dnr.ohio.gov
Eileen.Wyza@dnr.ohio.gov

ATTACHMENT B

Department of Natural Resources
ohiodnr.gov

Mike DeWine, *Governor*
Jim Tressel, *Lt. Governor*
Mary Mertz, *Director*

Office of Real Estate & Land Management
Tara Paciorek - Chief
2045 Morse Road – E-2
Columbus, Ohio 43229-6693

January 28, 2026

Daniel Ware
Power Engineers, Inc.
6530 W. Campus Oval Road, Suite 200
New Albany, Ohio 43054

Re: 26-0013_East Broad Street Relocation

Project: The proposed project involves abandoning approximately 500 feet of existing pipeline and installing 700 feet of new 2-inch and 12-inch coated steel high pressure pipeline via open cut to relocate lines for a City of Columbus roadway project.

Location: The proposed project is located in Jefferson Township, Franklin County, Ohio.

Center Coordinates: (39.9807, -82.8308)

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state, or federal agency nor relieve the applicant of the obligation to comply with any local, state, or federal laws or regulations.

Natural Heritage Database: A review of the Ohio Natural Heritage Database indicates there are no records of state or federally listed plants or animals within one mile of the specified project area. Records searched date from 1980.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area.

Fish and Wildlife: The Division of Wildlife (DOW) has the following comments.

The DOW recommends that impacts to streams, wetlands and other water resources be avoided and minimized to the fullest extent possible, and that Best Management Practices be utilized to minimize erosion and sedimentation.

The entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally endangered species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in clusters of dead leaves on tree limbs. However, these species are also dependent on the forest structure surrounding roost trees. If trees are present within the project area, and trees must be cleared, the DOW recommends tree and/or tree limb clearing only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with a Diameter Breast Height (DBH) ≥ 20" if possible. If trees are present within the project area, and trees and/or tree limbs must be cleared during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any clearing. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the OHIO DIVISION OF WILDLIFE AND U.S. FISH AND WILDLIFE SERVICE (OH-FIELD OFFICE) JOINT GUIDANCE FOR BAT SURVEYS. If state-listed bats are documented, DOW recommends tree clearing only occur from October 1 through March 31. However, limited summer tree clearing may be acceptable after consultation with the DOW (contact Eileen Wyza at Eileen.Wyza@dnr.ohio.gov).

For every project, the DOW also recommends that a winter bat habitat assessment is conducted to determine if potential hibernacula are present within the project area. This is to limit possible disturbances that seasonal tree clearing and/or subsurface work (e.g., trenching, blasting, etc.) may cause to hibernating bats. Potential hibernacula include rocky outcroppings, caves, and underground mines. Direction on how to conduct winter habitat assessments can be found in the joint guidance linked above. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile permanent tree clearing buffer around the hibernaculum entrance. Limited summer or winter tree clearing may be acceptable after consultation with the DOW. If a habitat assessment for projects involving subsurface disturbance finds that a potential hibernaculum is present within 5 miles of the project area, please consult with Eileen Wyza for project recommendations. If no tree clearing or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

The project is within the range of the following listed mussel species.
Federally Endangered
clubshell (*Pleurobema clava*)
rayed bean (*Villosa fabalis*)
northern riffleshell (*Epioblasma torulosa rangiana*)
snuffbox (*Epioblasma triquetra*)
purple cat's paw (*Epioblasma obliquata*)

Federally Threatened
rabbitsfoot (*Theliderma cylindrica*)

State Endangered
elephant-ear (*Elliptio crassidens crassidens*)
pocketbook (*Lampsilis ovata*)
long solid (*Fusconaia subrotunda*)
washboard (*Megalonaias nervosa*)
Ohio pigtoe (*Pleurobema cordatum*)

State Threatened
pondhorn (*Uniomerus tetralasmus*)
Salamander Mussel (*Simpsonaias ambigua*)

This project must not have an impact on native mussels. This applies to both listed and non-listed species, as all species of mussel are protected in Ohio. Per the Ohio Mussel Survey Protocol (2025), all Group 2, 3, and 4 streams (Appendix A) require a mussel survey. Per the Ohio Mussel Survey Protocol, Group 1 streams (Appendix A) and unlisted streams with a watershed of 5 square miles or larger above the point of impact should be assessed using the Reconnaissance Survey for Unionid Mussels (Appendix B) to determine if mussels are present. Mussel surveys may be recommended for these streams as well. Therefore, if in-water work is planned in any stream that meets any of the above criteria, the DOW recommends the applicant provide information to indicate no mussel impacts will occur. If this is not possible, the DOW recommends a professional malacologist conduct a mussel survey in the project area. If mussels that cannot be avoided are found in the project area, the DOW recommends a professional malacologist collect and relocate the mussels to suitable and similar habitat upstream of the project site. Mussel surveys and any subsequent mussel relocation should be done in accordance with the Ohio Mussel Survey Protocol. If there is no in-water work proposed, impacts to mussels are not likely.

The project is within the range of the following listed fish species.
State Endangered
goldeye (*Hiodon alosoides*)
shortnose gar (*Lepisosteus platostomus*)
Iowa darter (*Etheostoma exile*)
spotted darter (*Etheostoma maculatum*)
northern brook lamprey (*Ichthyomyzon fossor*)
tonguetied minnow (*Exoglossum laurae*)
popeye shiner (*Notropis ariommus*)

State Threatened
lake chubsucker (*Erimyzon sucetta*)
paddlefish (*Polyodon spathula*)

The DOW recommends no in-water work in perennial streams from March 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact these or other aquatic species.

Due to the potential for impacts to federally listed species, as well as to state-listed species, we recommend that this project be coordinated with the US Fish & Wildlife Service.

Water Resources: The Division of Water Resources has not conducted a project specific review and/or comments, however, the guidance provided below should be reviewed by the Environmental Review applicant for applicability on this project and subsequent compliance.

If the subject project is in a floodplain regulated by the Federal Emergency Management Agency (FEMA), the local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals. The FEMA National Flood Hazard Layer (NHFL) Viewer website can be utilized to see if the project is in a FEMA regulated floodplain. If the project is not in a FEMA regulated floodplain, then no further action is required.

Ohio Revised Code (ORC) Section 1521.16 mandates that any owner of a property or a facility that has the capacity of withdrawing 100,000 gallons per day (gpd) of water from groundwater, surface water, or both must register with the Division of Water Resources' Water Withdrawal Facilities Registration (WWFR) Program and report their withdrawals annually.

Additional coordination may be required depending on the location of the withdrawal and consumptive use. Restrictions or permitting may be required for:

- New or increased consumptive use of water averaging 2 million gallons per day (mgd) within 30 days within the Ohio River basin.
- New or increased withdrawal and consumptive water use in the Lake Erie watershed averaging 1 million gallons per day (mgd) or more in 90 days.
- New or increased water withdrawal directly from Lake Erie averaging 2.5 million gallons per day (mgd) or more in 90 days.
- Diversion or movement of water across the Ohio River and Lake Erie basin divide.

If the project does not involve activities that are subject to water withdrawal regulatory requirements as described above, then no further action is required. For more information, visit the Water Inventory & Planning website.

ODNR appreciates the opportunity to provide these comments. Please contact Mike Pettegrew (Environmental Services Administrator) at mike.pettegrew@dnr.ohio.gov if you have questions about these comments or need additional information.

Expiration: *ODNR Environmental Reviews are typically valid for 2 years from the issuance date. If the scope of work, project area, construction limits, and/or anticipated impacts to natural resources have changed significantly from the original project submittal, then a new Environmental Review request should be submitted.*