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Columbus, Ohio 43215
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April 23, 2026

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

RE: *In the Matter of the Construction Notification Application of Columbia Gas of Ohio, Inc. for a Certificate of Environmental Compatibility and Public Need for Adjustments to the Upper Arlington NCHP Pipeline Replacement Project.*
OPSB Case No. 26-0453-GA-BNR

Dear Ms. Troupe:

Columbia Gas of Ohio, Inc. ("Columbia") submits this Construction Notice, pursuant to Adm.Code 4906-6-03(B) and 4906-6-05, concerning a modification (the "Adjustment") to one area of the proposed pipeline replacement that was previously approved by the Ohio Power Siting Board ("OPSB") known as the Upper Arlington NCHP Pipeline Replacement Project (the "Project"), in Case No. 25-0890-GA-BLN.

Columbia also requests, pursuant to Adm.Code 4906-6-03(B) and 4906-6-04, expedited treatment of this Construction Notice for good cause. Good cause exists to grant expedited treatment because Project construction commenced in January 2026 and construction of the portion of the Project impacted by the Adjustment needs to occur on or about July 2026 to place the Project in-service in 2026 as planned. Columbia requests a certificate effective date of June 22, 2026.

Therefore, as required by Adm.Code 4906-6-05, please be advised of the following as it pertains to the Adjustment of the previously approved route:

(1) Provide the name of the project and applicant's reference number, a brief description of the project, and why the project meets the requirements for a construction notice application.

In Case No. 25-0890-GA-BLN, the OPSB approved Columbia's Letter of Notification to construct the Project which is generally located in the City of

Upper Arlington, the City of Columbus, Perry Township, and Franklin County. The Project, once completed, will be approximately 24,288 feet (4.60 miles) in length and consists of 20-inch diameter high pressure gas transmission class pipeline.

In this Construction Notice, Columbia is proposing an Adjustment to the Project route that totals less than one mile. The Adjustment will relocate approximately 1,558 feet (0.30 miles) of 20-inch diameter high pressure gas transmission class pipeline between stations 14+00 and 29+00. The Adjustment is needed to change the pipeline location from the intersection of Bethel Road and Kenny Road, as originally planned, to now cross Bethel Road at Postlewaite Road and Shuster Road in order to minimize traffic impacts. The location of the Adjustment is shown in **Attachment A**.

Much of the Adjustment will be constructed within the public road right-of-way within the City of Columbus, Perry Township, and Franklin County. Columbia plans to utilize a combination of augured Jack and Bore (JAB) and open trench installation methods to construct the Adjustment. 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 Adjustment.

The Adjustment meets the requirements of a Construction Notice as it is a “New construction, extension, relocation, upgrade, or replacement (except with a like facility) of gas pipelines or pipeline segments as follows: (a) Pipelines or pipeline segments not greater than one mile in length.” See Appendix B of Adm.Code 4906-1-01.

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

In addition to the rationale provided in the original filing for this Project, the Adjustment will allow Columbia to place the Project in-service in 2026 and receive Maintenance of Traffic Plan approval.

(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.

Attachment A, Figure 1 is a topographic map demonstrating the centerline in red and the limits of disturbance (“LOD”) in blue at a scale of 1” = 200’ (“Project Route”). The Project Route, currently shown to be the red line, may be shifted within the LOD identified in Attachment A and in conformance with any/all permitting restrictions imposed by the City of Columbus or relevant municipality. Previously existing natural gas pipelines are marked in orange. No electrical transmission lines are near the Project.

(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 Adjustment is needed to change the pipeline location from the intersection of Bethel Road and Kenny Road which was originally planned to be installed via Jack and Bore. Due to the size of the work zone required for this installation methodology and the expected impact to traffic in the area, Columbia needs to relocate the pipeline to cross Bethel Road at Postlewaite Road and Shuster Road to minimize traffic impacts. The proposed route was developed taking into consideration the current pipeline route, locations of existing gas distribution facilities where services 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, environmental features, and trees. Tree trimming has already taken place along the pipeline route and will continue 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 12 structures within 1,000 feet of the centerline, none of which are schools, daycares, or places of worship. For details on the cultural study, please see **Attachment B** 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 continue to utilize the same public information campaign as originally explained in Case No. 25-0890-GA-BLN. Columbia will provide the notices required by the OPSB rules, including a copy of this Construction Notification (with attachments) posted in libraries, and notices to public officials. 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.

Construction for the 4.6-mile Upper Arlington NCHP Pipeline Replacement Project began in January 2026. Columbia anticipates installation of the 0.3-mile Adjustment to begin around July 2026 with an anticipated in-service date of December 2026. Columbia also anticipates trimming trees as needed. Columbia will work with the City of Columbus, Perry Township, Franklin County, 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 A, Figure 2 is an aerial map demonstrating the centerline in red and the limits of disturbance in blue at a scale of 1" = 200'. Parcel boundaries are highlighted in yellow. The Project Route, currently shown to be the red line, may be shifted within the LOD identified in Attachment A.

(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 affected property owners for the Adjustment is included in **Attachment E**.

As of the date of this filing, all necessary easements have been secured for the Adjustment. 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 Adjustment will, like the rest of the Project, 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 E**, most of the workspace will be limited to the road right-of-way.

A list of affected property owners is included in **Attachment E**.

(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 Adjustment does not cause a material increase to the Project estimated cost.

(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 Adjustment is located within the City of Columbus and Perry Township, Franklin County, Ohio. The current land use along the route is comprised of mostly commercial warehouses. There is an approximately 130-foot-long section of the route that will be bored in the effort to minimize impacts to the CSX railroad right-of-way.

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

The municipalities, townships, and counties affected include Franklin County, Perry Township 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 Adjustment.

(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.

A review request letter for the Adjustment was submitted to the Ohio State Historic Preservation Office (SHPO) on February 18, 2026, and comments were received from the Ohio SHPO on February 23, 2026. As this Adjustment serves to address the 0.3-mile rerouted segment for the 4.6-mile Upper Arlington NCHP Pipeline Replacement Project (OPSB Case No. 25-0890-GA-BLN), the SHPO has previously reviewed and commented on the 4.6-mile Project on June 30, 2025. Previous comments note that 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 4.6-mile Upper Arlington NCHP Pipeline Replacement Project area. Additionally, one OHI is within the 4.6-mile Upper Arlington NCHP Pipeline Replacement Project area but will not be impacted by the proposed project. The SHPO has determined that the Project and the Adjustment have low potential to encounter intact, significant archaeological deposits, and will have no effect on historic properties.

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

(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 Construction Notification has been sent to the following public officials concurrently with its submittal to the Ohio Power Siting Board pursuant to Adm.Code 4906-6-07(A)(1).

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
John O'Grady	Kenneth N. Wilson
Franklin County Commissioner	Franklin County Administrator
373 S. High Street	373 S. High Street
Columbus, Ohio 43215	Columbus, Ohio 43215
Jennifer Fish	Adam W. Fowler, P.E., P.S.
Franklin County Soil and Water (Director)	Franklin County Engineer
1404 Goodale Boulevard, Suite 100	970 Dublin Road
Columbus, Ohio 43212	Columbus, Ohio 43215

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	

City of Columbus	
Hon. Andrew Ginther	Shannon G. Hardin
City of Columbus Mayor	City of Columbus Council President – District 9
90 W. Broad Street	90 W. Broad Street
Columbus, Ohio 43215	Columbus, Ohio 43215
Rob Dorans	Nicholas J. Bankston
Columbus City Council President Pro Tem – District 3	Councilmember – District 5
90 W. Broad Street	90 W. Broad Street
Columbus, Ohio 43215	Columbus, Ohio 43215
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
Tiara N. Ross	Melissa Green
Columbus City Council – District 7	Councilmember – District 6
90 W. Broad Street	90 W. Broad Street
Columbus, Ohio 43215	Columbus, Ohio 43215
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
Scott Messer	Kelly Scocco
City of Columbus Director	City of Columbus Director
Department of Building and Zoning Services	Department of Public Service
111 N. Front Street	111 N. Front Street
Columbus, Ohio 43215	Columbus, Ohio 43215

In addition to submitting this Construction 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); Final Site Compliance Plan
- Perry Township Right-of-Way and Excavation 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 lists species that, as of February 26, 2026, potentially occur in the Project area.

Table 1. USFWS IPaC Species List for Project Study Area		
Common Name	Scientific Name	Status
Insects		
Monarch Butterfly	<i>Danaus plexippus</i>	Proposed Threatened
Mammals		
Indiana Bat	<i>Myotis sodalis</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 February 17, 2026, potentially occur in Franklin County.

Table 2. ODNR Franklin County Species List as of February 17, 2026			
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	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>Megalonaias nervosa</i>	Endangered	-
Threehorn Wartyback	<i>Obliquaria reflexa</i>	Species of Concern	-
Round Hickorynut	<i>Obovaria subrotunda</i>	Threatened	-
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>Simpsonaias 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>Uniomerus 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	-
Mammals			
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	-
Tricolored Bat	<i>Perimyotis subflavus</i>	Endangered	-
Flowering Plants			
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 var. 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	-
Abor Vitae	<i>Thuja occidentalis</i>	Potentially Threatened	-
Three-birds Orchid	<i>Triphora trianthophora</i>	Potentially Threatened	-
Rock Elm	<i>Ulmus thomasii</i>	Potentially Threatened	-

A project review request letter concerning the 0.3-mile Adjustment was submitted to ODNR on February 23, 2026, seeking an updated review of the potential impacts of the 4.6-mile Upper Arlington NCHP Pipeline Replacement Project on federal and state listed species and their habitats within the Project area. An updated response was received on March 18, 2026. The ODNR 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 (*Alasmidonta 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 (*Ptychobranthus fasciolaris*, Species of Concern). These species are not specifically recorded within the 4.6-mile Project area itself.

In addition, the ODNR states that the Project is within the vicinity of records for the Little brown bat (*Myotis lucifugus*, State Endangered). Columbia will adhere to seasonal tree clearing timeframes recommended by both USFWS and ODNR as the 4.6-mile 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. Please refer to Attachment C for IPaC and agency consultation information.

The 4.6-mile 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 4.6-mile Project area. In addition, two streams have been delineated within the 4.6-mile 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 4.6-mile 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 0.3-mile Adjustment area was included within the original scope of review of the 4.6-mile Project, 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. No streams or wetlands were identified within the 0.3-mile Adjustment area. Streams identified in the remainder of the 4.6-mile Project area are not part of a National or State wild and scenic river. For the full Wetland

Delineation Report pertaining to the entire 4.6-mile project, please see **Attachment D**. Excerpts of **Attachment D** 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 1st through March 31st 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
Melissa L. Thompson (Counsel of Record)

Melissa L. Thompson, VP and Deputy
Gen. Counsel (0086367)
Ashley G. LaRock, Sr. Counsel (0101034)
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