



Engineers, Surveyors, Planners, Scientists

**DeliveringSolutions.**

5500 New Albany Rd.

Columbus, OH 43054

p. 614.775.4500

f. 614.775.4800

[info@emht.com](mailto:info@emht.com)

**Cultural Resources Literature Review for the  
approximately 1.3 mi. Generation Pipeline - Ironville  
Natural Gas Pipeline in the City of Oregon, Lucas  
County, Ohio**

Utility Technologies International

August 22, 2018

2018-0605

[emht.com](http://emht.com)

# **Cultural Resources Literature Review for the approximately 1.3 mi. Generation Pipeline - Ironville Natural Gas Pipeline in the City of Oregon, Lucas County, Ohio**

By:

**Joel Brown**

Prepared for:

**Utility Technologies International  
4700 Homer Ohio Lane  
Groveport, OH 43125**

Submitted by:

**Joel Brown, P.I.  
EMH&T  
Cultural Resources Department  
5500 New Albany Road  
Columbus, Ohio 43054  
Phone: (614) 775-4526 Fax: (614) 775-4802**

**Project #: 2018-0605**

**22 August 2018**



## **EMH&T Cultural Resources Management Literature Review**

**Name:** Generation Pipeline - Ironville

**County:** Lucas

**Municipality:** Oregon

This literature review was conducted for the construction of a 16 inch natural gas pipeline in the City of Oregon, Lucas County, Ohio (Figures 1-2). The project begins at York Street, follows existing railroad lines and terminates just south of Corduroy Road.

### **Historic Atlases**

Historic atlases and the 7.5 and 15-minute topographic maps of Oregon Township, Lucas County were researched for the location of historic buildings and for past owners.

The Oregon Township portion of *An Illustrated Historical Atlas of Lucas and part of Wood Counties, Ohio* (Andreas & Baskin 1875) indicated that a house on the Joseph Palkofar property was located near the project corridor on Corduroy Road (Figure 3).

The Oregon Township portion of *The Official Atlas of Lucas County, Ohio* (Uhl 1900) indicated that a house on the Jos. Pelkofer was located near the project corridor on Corduroy Road (Figure 4).

### **USGS 15 Minute Topographic map**

The United States Geological Survey (USGS) 1900 *Maumee Bay, Ohio Quadrangle 15 Minute Series (Topographic)* map indicated that there was a house located in or near the project corridor on the north side of York Street (Figure 5). A modern industrial facility now occupies this location.

### **USGS 7.5 Minute Topographic map**

The United States Geological Survey (USGS) 1965 (*Photorevised 1980*) *Oregon, Ohio-Michigan 7.5 Minute Series (Topographic)* map indicated that there was a building near the western project terminus and another on the north side of York Street (Figure 2). Modern aeriels indicate that neither still exists.

### **An Archaeological Atlas of Ohio (William C. Mills 1914)**

In the early part of the past century the director of the Ohio Archaeological and Historical Society, William C. Mills, produced a generalized map of mound and site locations at the county level through personal inspection and correspondence. Examination of William C. Mills' *Archaeological Atlas of Ohio* (1914) indicated there were no such features within proximity of the project corridor (Figure 6).



### **State Historic Preservation Office**

The literature review at the State Historic Preservation Office (SHPO) encompassed the project corridor and immediately adjacent area (Figure 7). The cultural resources identified within this study area are discussed below.

### **Ohio Genealogical Society Cemeteries**

A review of the archived Ohio Genealogical Society (OGS) Cemeteries files stored at the SHPO was conducted. The North Oregon Cemetery is located just south of the project corridor (Figure 7). The North Oregon Cemetery is a modern operating cemetery with well established boundaries that is open to the public. The project corridor is clearly located north of the cemetery boundaries.

### **Ohio Historic Inventory Files**

A search was conducted of the Ohio Historic Inventory (OHI) files to determine if any previously documented historic buildings or structures were located within the study area. There were two OHI properties located near the project corridor (Figure 7). Property LUC-1759-10 was located approximately 140 ft. south of the project corridor on the south side of Corduroy Road. Modern aerials indicate that this house has been demolished. The Ironville Watchtower (LUC-2263-10) is a railroad watchtower from the early 20<sup>th</sup> century located along the railroad tracks.

### **Consensus Determination of Eligibility Files**

A review of the archived Consensus Determination of Eligibility (DOE) files stored at the SHPO was conducted. There were no DOE properties identified within or adjacent to the project corridor (Figure 7).

### **National Register of Historic Places Files**

A search of the National Register of Historic Places (NRHP) files was conducted for historic properties in the vicinity of the project area. There were no NRHP properties identified within or adjacent to the project corridor (Figure 7).

### **National Historic Landmark Files**

A review of the archived National Historic Landmarks files stored at the SHPO was conducted. There were no NHL properties identified within or adjacent to the project corridor (Figure 7).

### **Cultural Resources Management Reports**

A review of the archived Cultural Resources Management (CRM) reports stored at the SHPO was conducted. One CRM report overlapped with the project corridor.



Dobson-Brown, Deborah, Kevin Gibbs, Lori Frye and M. Nickerson  
1994 A Cultural Resources Reconnaissance Survey of the Maumee River Crossing in Lucas  
and Wood Counties, Ohio (PID 10718)

This survey overlaps with the entire project corridor (Figure 7). This survey identified all of the OHI properties and all of the OAI properties addressed in the literature review.

### **Ohio Archaeological Inventory Files**

A search was conducted of the Ohio Archaeological Inventory (OAI) files to determine whether any previously documented archaeological sites were located within the study area. A total of six archaeological sites were identified in or near the project corridor (33-LU-531, 550, 558, 560, 561 and 562). Sites 33-LU-531 and 550 contained two prehistoric artifacts. Sites 33-LU-560 and 561 contained evidence of former historic era houses. Sites 33-LU-558 and 562 were historic era, open field trash scatters. None of these sites were recommended for additional work (Dobson-Brown et al 1994; Appendix A).

### **Conclusions**

A review of historic topographic maps and atlases was conducted in order to determine the presence of historic buildings within the project corridor. Based on the review of historic maps and atlases, there were no historic buildings located directly in the project corridor. A couple of 20<sup>th</sup> century buildings that were formerly located in or near the project corridor have been demolished. Therefore, there is a low probability that any historic era archaeological sites would be located within the project corridor. If any are discovered they would likely relate to more modern, early 20<sup>th</sup> century houses.

Based on a review of the records found at SHPO, there were no previously identified DOE properties, NRHP or NHL properties in or near the project corridor. The North Oregon Cemetery is located near the project corridor but since it is a modern, operating cemetery with well-defined boundaries there is no overlap with the project corridor. There were two OHI properties identified near the project corridor. One of the properties has been demolished (LUC-1759-10) while the other is still standing. Both these properties were recommended as being not eligible for inclusion onto the NRHP (Dobson-Brown et al 1994). Since the project is an underground installation along existing railroad tracks in an industrial portion of Oregon, there is very little chance that this project would affect the setting of any known or unknown historic properties.

It was discovered during the review of SHPO's records that a former cultural resources survey overlapped with nearly the entire project corridor (Dobson-Brown et al 1994). This survey identified all of the OHI properties and OAI sites in the vicinity of the project corridor. Of the six OAI sites near the project corridor, two were small prehistoric era sites, two related to 20<sup>th</sup> century house remains and two were historic period, open field, trash scatters. None of the OAI sites were recommended as eligible for inclusion onto the NRHP.



Based on the information discovered during the literature review the entire project corridor has been previously surveyed and large portions of the project have likely been heavily disturbed (Figure 8). This survey found no eligible OHI properties or OAI sites in the vicinity of the project corridor. Based on the results of the prior cultural resource survey, no further work is recommended for the project corridor.

### **Bibliography**

Andreas & Baskin

1875 *An Illustrated Historical Atlas of Lucas and part of Wood Counties, Ohio*. Andreas & Baskin, Chicago, IL.

Dobson-Brown, Deborah, Kevin Gibbs, Lori Frye and M. Nickerson

1994 A Cultural Resources Reconnaissance Survey of the Maumee River Crossing in Lucas and Wood Counties, Ohio (PID 10718)

Mills, W. C.

1914 *Archaeological Atlas of Ohio*. Ohio State Archaeological and Historical Society, Columbus, OH.

Uhl, John

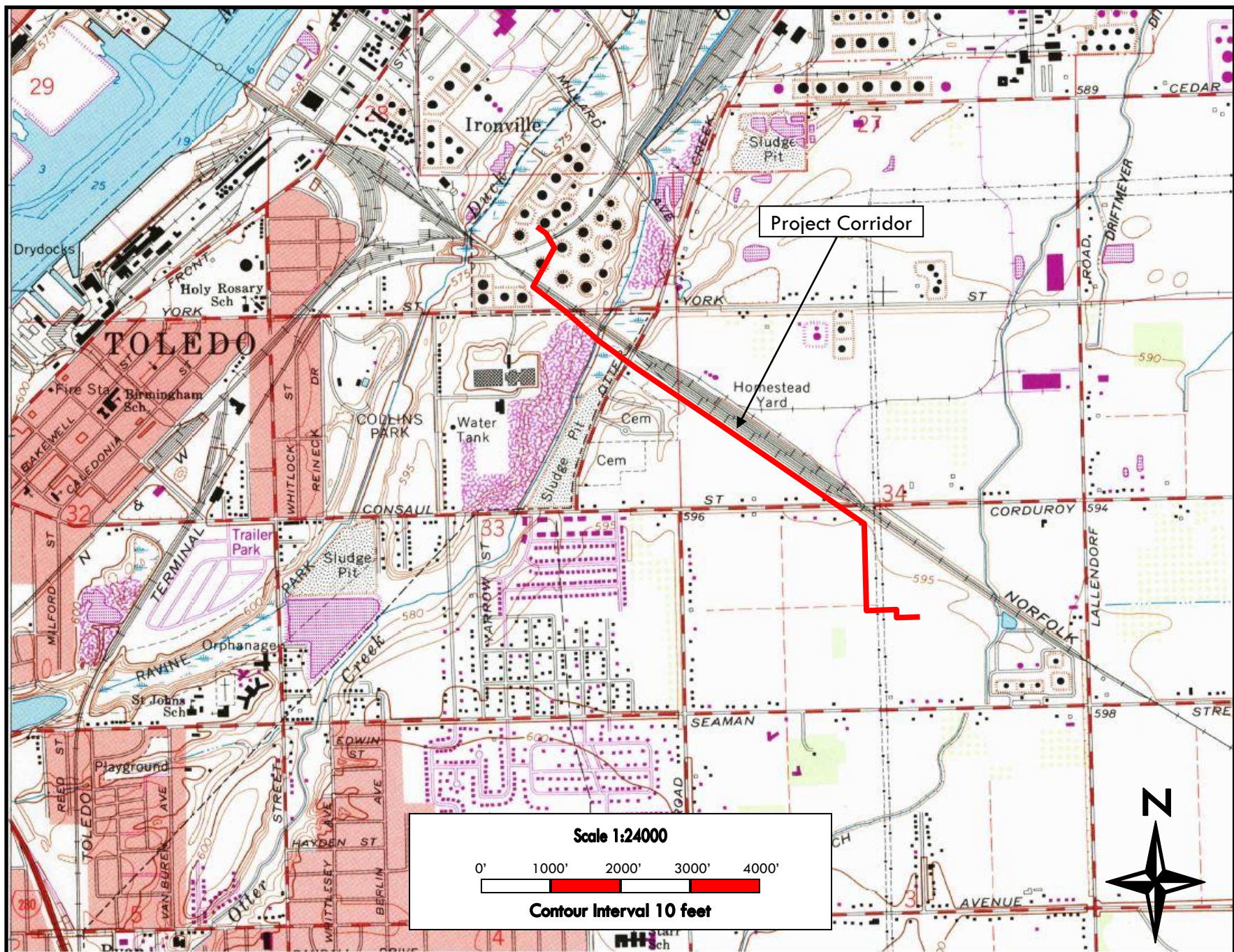
1900 *The Official Atlas of Lucas County, Ohio*. The Uhl Bros. Co., Toledo, OH.

## Figures



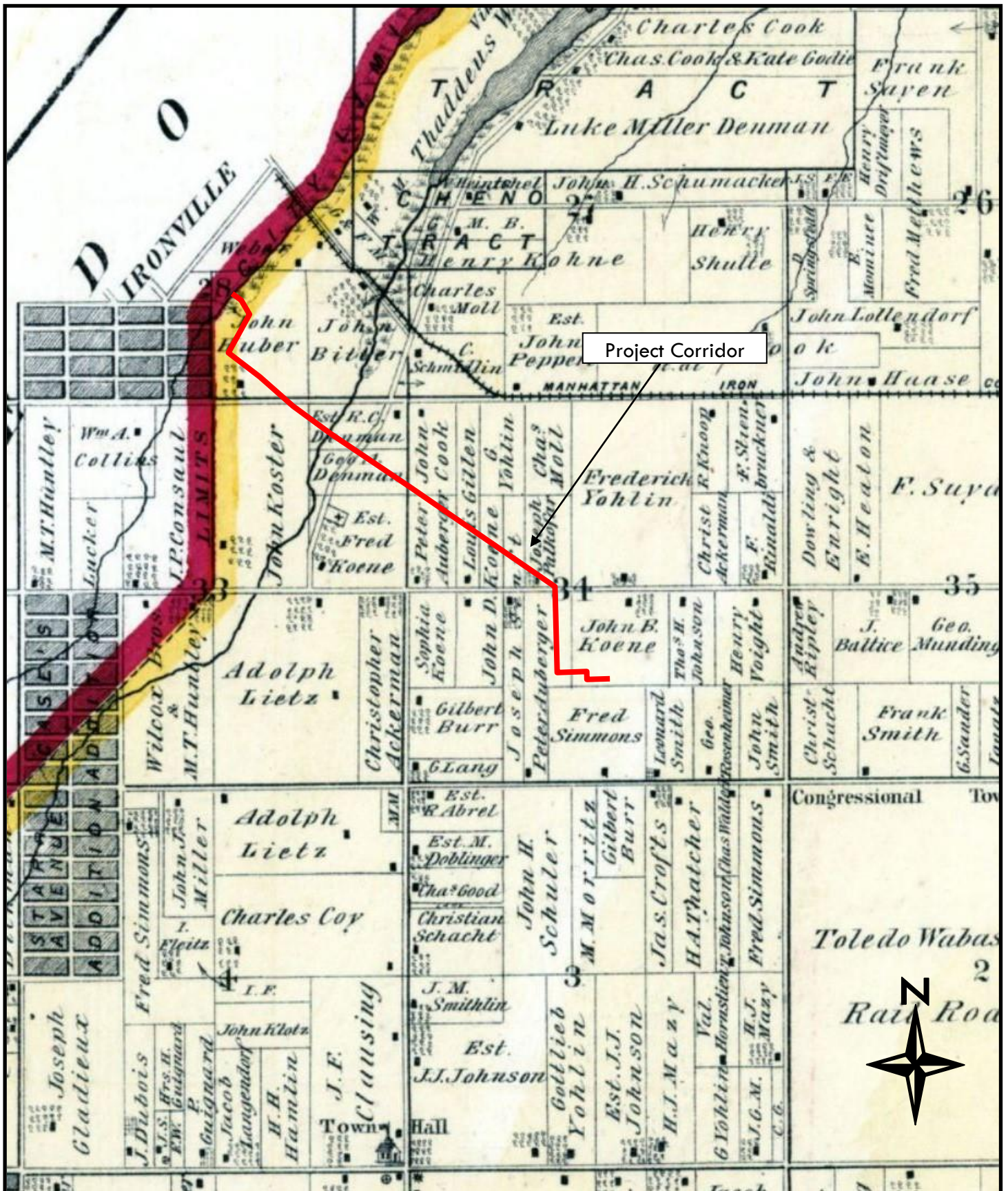
Figure 1. Political map of Ohio showing the approximate location of the project corridor.





**Figure 2.** Portion of the United States Geological Survey (USGS) 1965 (Photorevised 1980) Oregon, Ohio-Michigan 7.5 Minute Series (Topographic) map showing the location of the project corridor.





**Figure 3.** Portion of *An Illustrated Historical Atlas of Lucas and part of Wood Counties, Ohio* (Andreas & Baskin 1875) showing the approximate location of the project corridor.



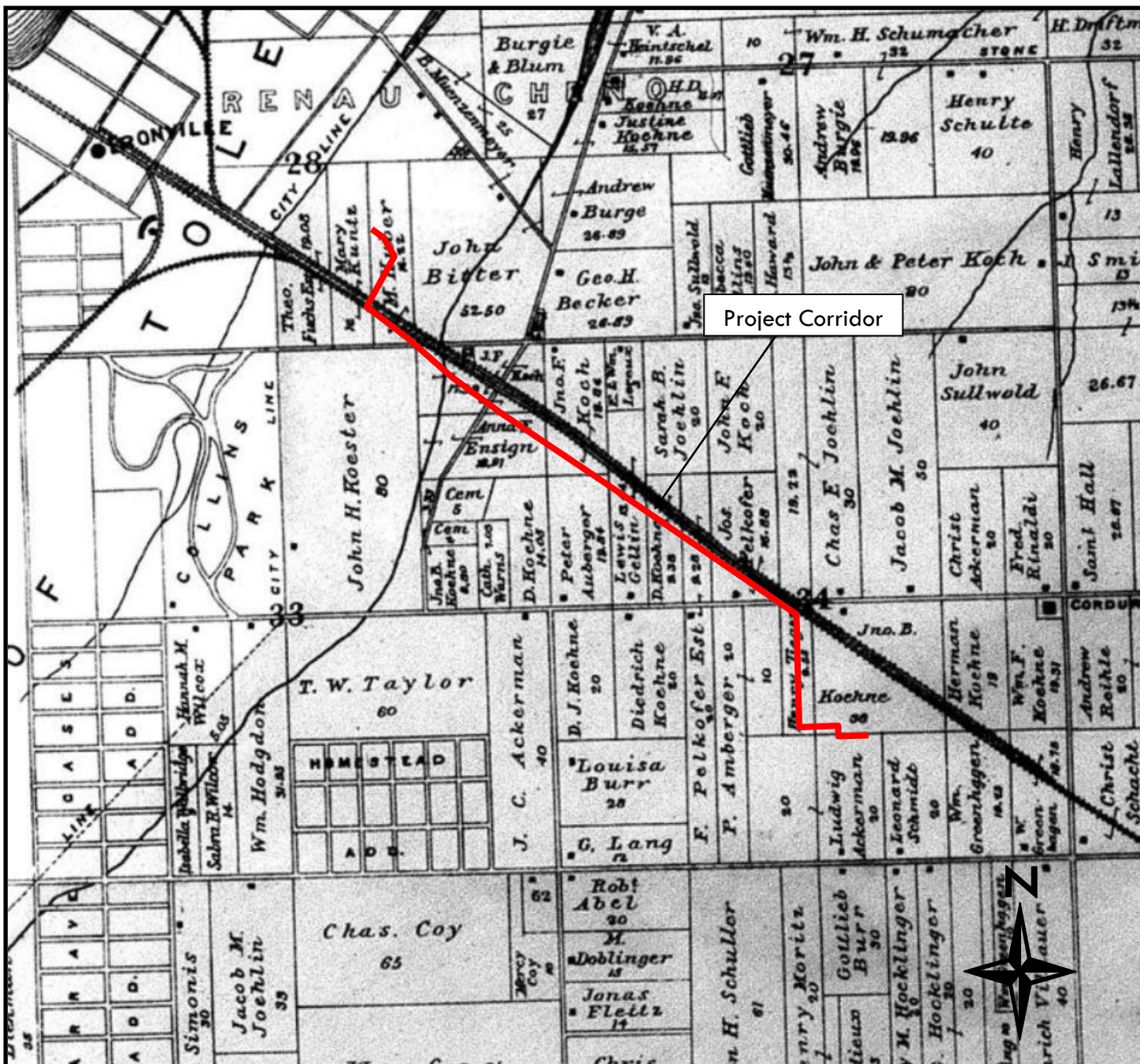
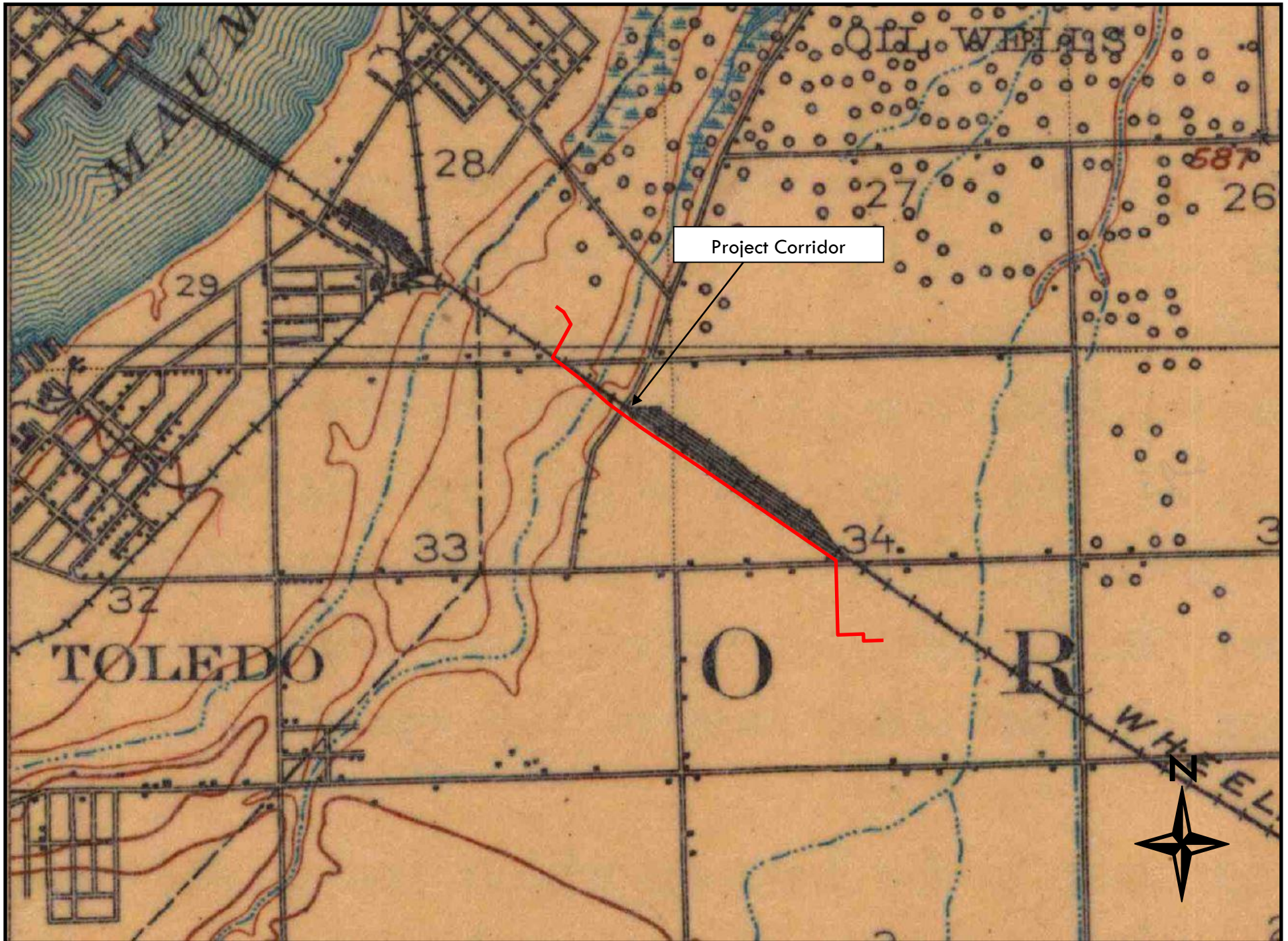


Figure 4. Portion of The Official Atlas of Lucas County, Ohio (Uhl 1900) showing the approximate location of the project corridor.





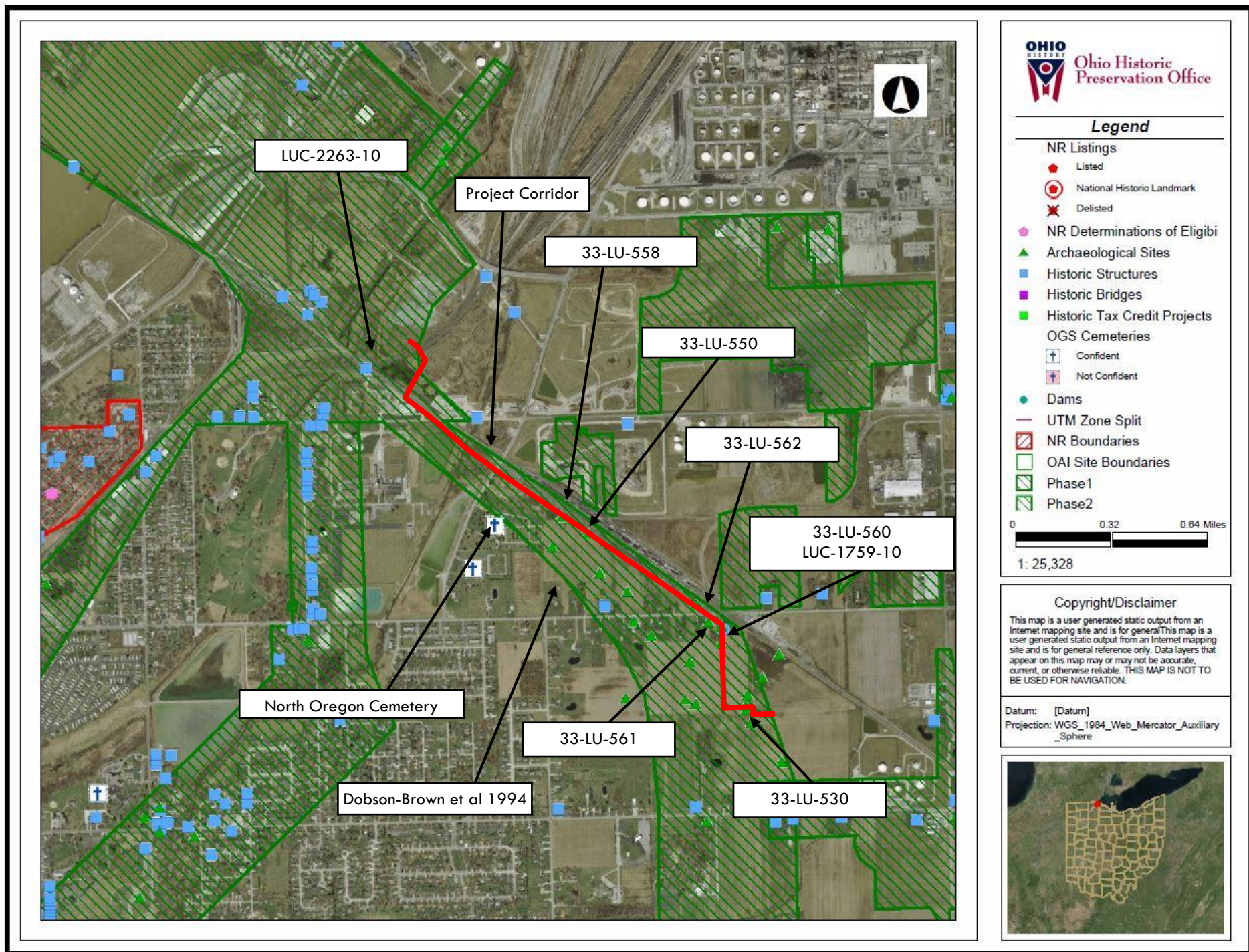
**Figure 5.** Portion of the United States Geological Survey (USGS) 1900 Maumee Bay, Ohio Quadrangle 15 Minute Series (Topographic) map showing the approximate location of the project corridor.





**Figure 6.** A portion of the *Archaeological Atlas of Ohio* (Mills 1914) showing the approximate location of the project corridor.









**Figure 8.** Google Earth aerial of the project corridor showing modern conditions.





In reply refer to  
2018-LUC-42172

June 20, 2018

Sean Pepper  
UTI  
4700 Homer Ohio Lane  
Groveport, Ohio 43125

Dear Mr. Pepper:

**Re: CNR Ironville Pipeline, Oregon Township, Lucas County, Ohio**

This is in response to correspondence, received on June 4, 2018, regarding the proposed pipeline installation in Oregon Township, Lucas County, Ohio. My comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated regulations at 36 CFR Part 800.

Based on the information submitted, it is my opinion that the proposed undertaking will not affect properties listed in or eligible for listing in the National Register of Historic Places. No further coordination with this office is necessary, unless the project changes or unless new or additional historic properties are discovered during implementation of this project. Should this happen, this office should be notified as required by 36 CFR 800.13

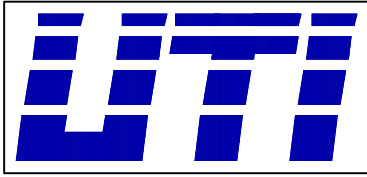
If you have any questions regarding this matter, please call me, at (614) 298-2000. Thank you for your cooperation.

Sincerely,

A handwritten signature in dark ink, reading "Nathan J. Young".

Nathan J. Young, Project Reviews Manager  
Resource Protection and Review





Utility Technologies International  
4700 Homer Ohio Lane  
Groveport, OH 43125  
P: 614-482-8080  
[www.uti-corp.com](http://www.uti-corp.com)

May 29, 2018

U.S. Department of the Interior  
U.S. Fish and Wildlife Service  
Ecological Services Office  
Attn: Dan Everson  
4625 Morse Road, Suite 104  
Columbus, OH 43230

Re: CNR Ironville Pipeline Project  
Generation Pipeline, LLC  
Request for Threatened and Endangered Species Coordination

Dear Mr. Everson,

Utility Technologies International (UTI), on behalf of Generation Pipeline, LLC (GPL), is requesting threatened and endangered coordinated for a proposed natural gas pipeline project. Information obtained as part of this coordination will be used in support an U.S. Army Corp of Engineers Nationwide Permit 12 and an Ohio Power Siting Board Construction Letter of Notification.

GPL is proposing to construct a steel natural gas pipeline (Project). The Project will be 16" in diameter and approximately 7,687 in length. The Project will begin at an existing 24" transmission pipeline west of North Lallendorf Road and north of Seaman Road in the Oregon Township, Lucas County, Ohio. The Project will extend northwest paralleling CSX railroad tracks across Corduroy Road, Otter Creek Road and York Street before turning north across the railroad tracks across BOC America Gas property and then northwest to a single-end user facility. The single-end user facility is the new Cliffs Natural Resources iron briquette processing plant.

UTI has conducted an environmental survey of the project corridor including pipeline centerline, temporary and permanent easements, bore locations, work space, and access roads. Two upland communities including open field and scrub shrub field exist within the project area. The open field is common throughout the project. Two upland communities including open field and scrub shrub field exist within the project area. The open field is common throughout the project. Typical herbaceous vegetation within this community includes tall false rye grass (*Schedonorus arundinaceus*), flat-stem bluegrass (*Poa compressa*), common reed (*Phragmites australis*), tumbleweed (*Amaranthus alba*), white clover (*Trifolium repens*), common timothy (*Phleum pretense*), Kentucky bluegrass (*Poa pratensis*), Canada goldenrod (*Solidago anadensis*), white old field American-aster (*Symphyotrichum pilosum*), and Canadian thistle (*Cirsium arvense*).

The scrub-shrub community is located along the southern edge of the property boundary and is represented by Sample Plots 11 and 14. The herbaceous layer is dominated by garlic mustard (*Alliaria petiolata*), Canada goldenrod, lesser burdock (*Arctium minus*), fragrant bedstraw (*Galium triflorum*),

Fuller's teasel (*Dipsaucus fullonum*), and a grass (*Poa* sp.). Dominant shrubs in this community include gray dogwood (*Cornus racemosa*), rough-leaf dogwood (*Cornus rummondii*), Morrow's honeysuckle (*Lonicera morrowii*), and Amur honeysuckle (*Lonicera maackii*).

Fifteen (15) low quality emergent wetlands were identified along the survey corridor. These wetlands consist of palustrine emergent (PEM) and palustrine scrub shrub (PSS) vegetation. These wetlands were associated with past disturbance associated with industrial development and railroad activities.

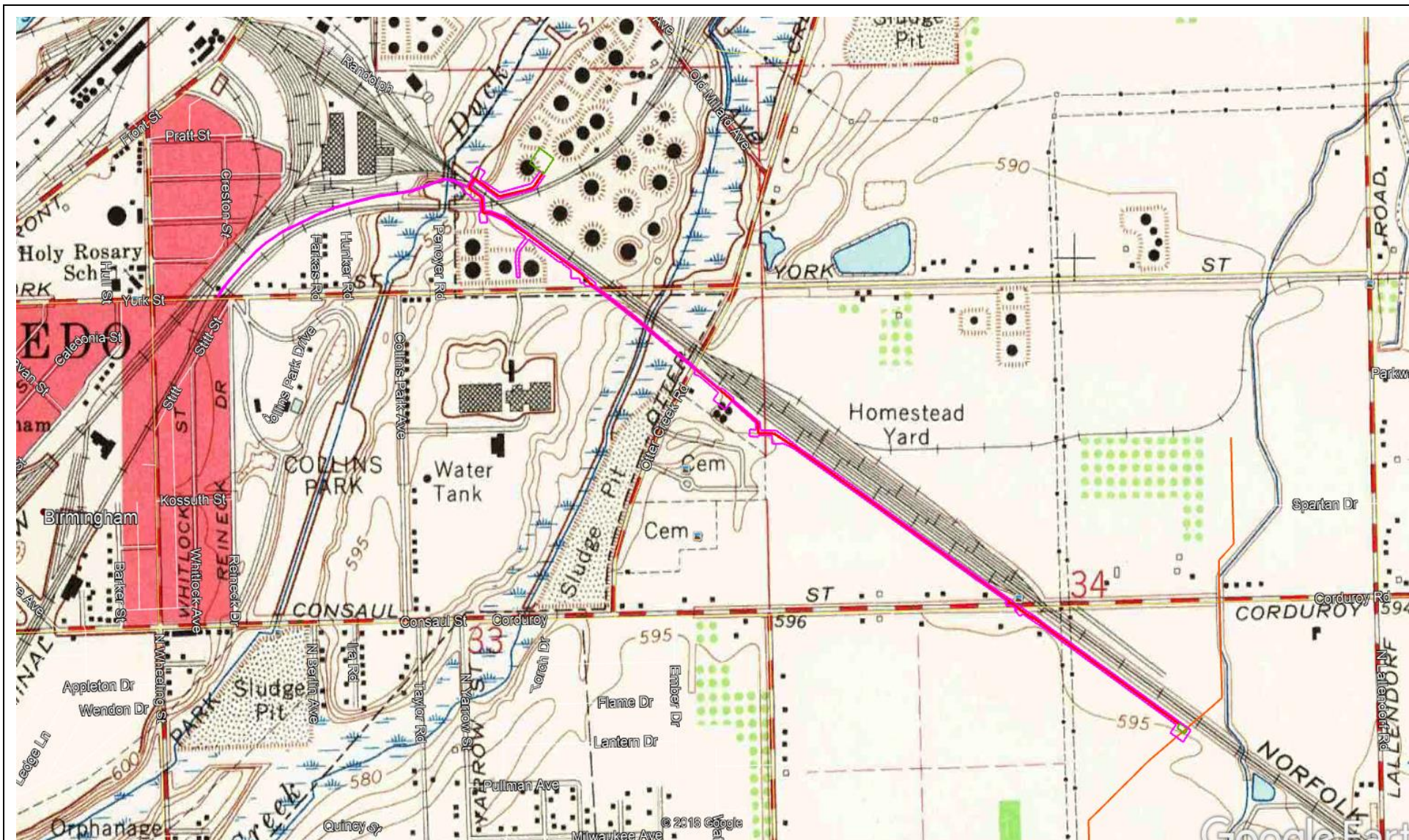
Construction work in the additional work space areas will not impact any delineated wetlands or streams. Construction will avoid and protect those areas. Please let us know if you have any comments regarding this report from ESI. Please feel free to contact me at either phone number listed below or by email.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Sean Peffer', is positioned above the typed name.

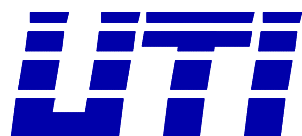
Sean Peffer  
Environmental Coordinator  
[speffer@uti-corp.com](mailto:speffer@uti-corp.com)  
Office: 614-482-8080  
Mobile: 937-707-2328

Encl: Figure 1 – USGS Topographic Map  
Figure 2 – Aerial Photograph



**FIGURE 1 – USGS TOPOGRAPHIC MAP**

1:24,000 Oregon, OH Quadrangle (1965)

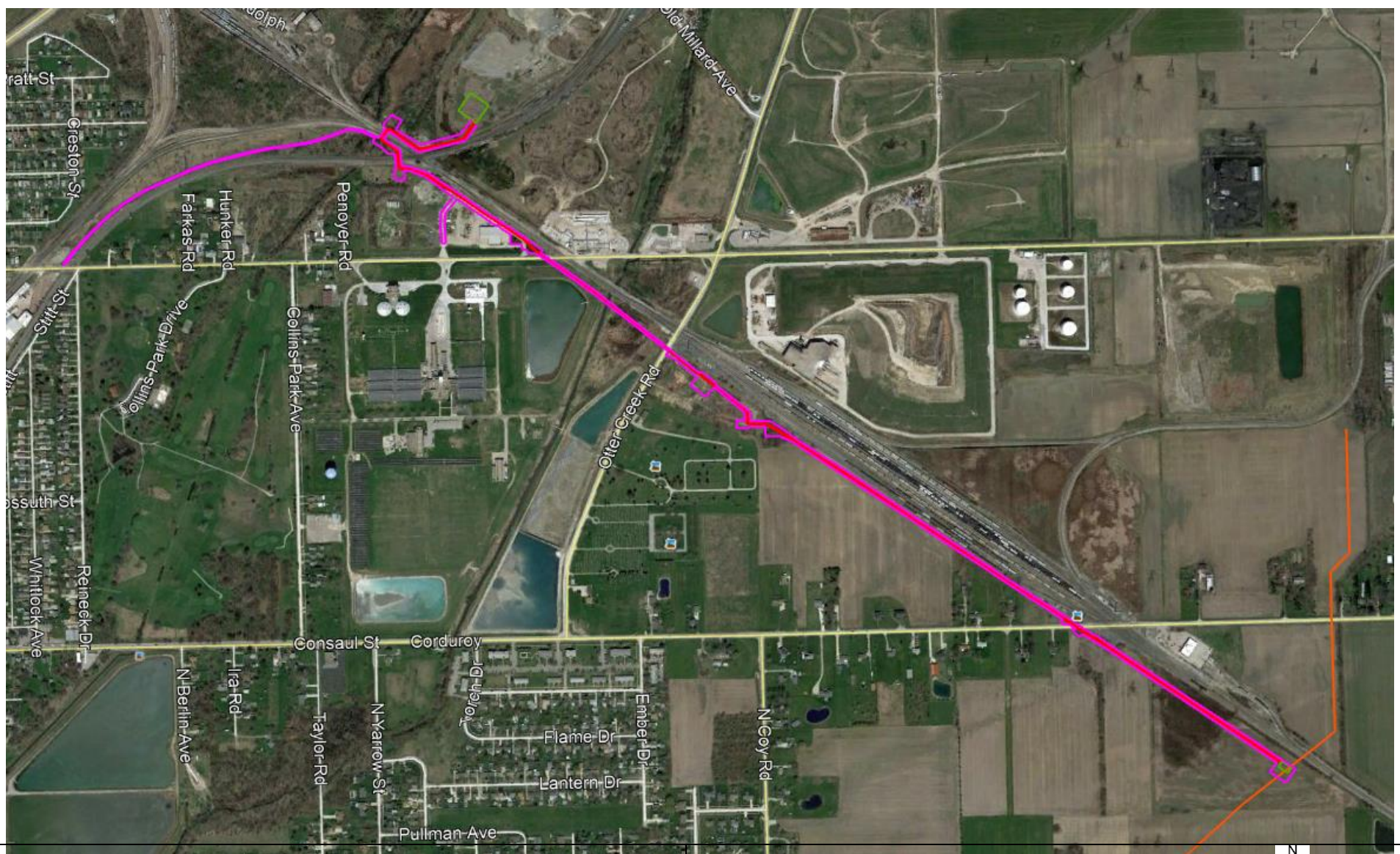


UTILITY TECHNOLOGIES  
INTERNATIONAL  
4700 HOMER OHIO LANE  
GROVEPORT, OH 43125  
P: 614-482-8080  
WWW.UTI-CORP.COM

**Site Name:** CNR Ironville Pipeline  
Generation Pipeline, LLC  
Lucas County, Ohio

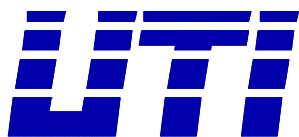
**Project Number:** 17031





**FIGURE 2 – Aerial Photograph**

Not to Scale Image Source: Google Earth Pro (2018)



UTILITY TECHNOLOGIES  
INTERNATIONAL  
4700 HOMER OHIO LANE  
GROVEPORT, OH 43125  
P: 614-482-8080  
WWW.UTI-CORP.COM

**Site Name:** CNR Ironville Pipeline  
Generation Pipeline, LLC  
Lucas County, Ohio

**Project Number:** 17031



UNITED STATES DEPARTMENT OF THE INTERIOR  
U.S. Fish and Wildlife Service  
Ecological Services Office  
4625 Morse Road, Suite 104  
Columbus, Ohio 43230  
(614) 416-8993 / Fax (614) 416-8994



TAILS# 03E15000-2018-TA-1445

Dear Mr. Pepper,

We have received your recent correspondence requesting information about the subject proposal. There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. The following comments and recommendations will assist you in fulfilling the requirements for consultation under section 7 of the Endangered Species Act of 1973, as amended (ESA).

The U.S. Fish and Wildlife Service (Service) recommends that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the 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. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

**FEDERALLY LISTED SPECIES COMMENTS:** All projects in the State of Ohio lie within the range of the federally endangered **Indiana bat** (*Myotis sodalis*) and the federally threatened **northern long-eared bat** (*Myotis septentrionalis*). In Ohio, presence of the Indiana bat and northern long-eared bat is assumed 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 travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags  $\geq 3$  inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, 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 and abandoned mines.

Should the proposed site contain trees  $\geq 3$  inches dbh, we recommend that trees be saved 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  $\geq 3$  inches dbh cannot be avoided, we recommend that removal of any trees  $\geq 3$  inches dbh only occur between October 1 and March 31. Seasonal clearing is being recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see <http://www.fws.gov/midwest/endangered/mammals/nleb/index.html>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present.

If implementation of this seasonal tree cutting recommendation is not possible, summer surveys may be conducted to document the presence or probable absence of Indiana bats within the project area during the summer. If a summer survey documents probable absence of Indiana bats, the 4(d) rule for the northern long-eared bat could be applied. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Endangered Species Coordinator for this office. Surveyors must have a valid federal permit. Please note that summer surveys may only be conducted between June 1 and August 15.

If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), 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 that 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.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species. Should the project design change, or during the term of this action, 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, consultation with the Service should be initiated to assess any potential impacts.

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 ESA, and are consistent with the intent of the National Environmental Policy Act of 1969 and the Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document. We recommend that the project be coordinated with the Ohio Department of Natural Resources due to the potential for the project to affect state listed species and/or state lands. Contact John Kessler, Environmental Services Administrator, at (614) 265-6621 or at [john.kessler@dnr.state.oh.us](mailto:john.kessler@dnr.state.oh.us).

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](mailto:ohio@fws.gov).

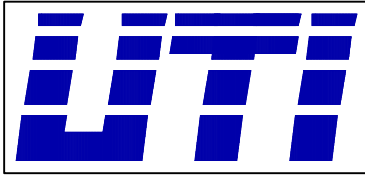
Sincerely,

A handwritten signature in blue ink, appearing to read "Scott Pruitt".

Scott Pruitt  
Acting Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW  
Kate Parsons, ODNR-DOW





Utility Technologies International  
4700 Homer Ohio Lane  
Groveport, OH 43125  
P: 614-482-8080  
[www.uti-corp.com](http://www.uti-corp.com)

## MEMORANDUM

To: Ohio Department of Natural Resources  
From: Sean Pepper, Environmental Coordinator  
Date: May 31, 2018  
Subject: **Environmental Review Request**

---

**Re: CNR Ironville Pipeline Project, Lucas County, Ohio**

### **Project Description:**

#### **1. Site Location (County, Latitude, Longitude)**

This project will be located in Lucas County Ohio.

Lat: 41°39'22.66"N

Lon: 83°27'17.44"W

#### **2. Onsite habitats**

Two upland communities including open field and scrub shrub field exist within the project area. The open field is common throughout the project. Two upland communities including open field and scrub shrub field exist within the project area. The open field is common throughout the project.

Fifteen low quality emergent wetlands were identified along the survey corridor. These wetlands consist of palustrine emergent (PEM) and palustrine scrub shrub (PSS) vegetation. These wetlands were associated with past disturbance associated with industrial development and railroad activities.

#### **3. Proposed Work**

The Project will be 16" in diameter and approximately 7,687 in length. The Project will begin at an existing 24" transmission pipeline west of North Lallendorf Road and north of Seaman Road in the Oregon Township, Lucas County, Ohio. The Project will extend northwest paralleling CSX railroad tracks across Corduroy Road, Otter Creek Road and York Street before turning north across the railroad tracks across BOC America Gas property and then northwest to a single-end user facility. The single-end user facility is the new Cliffs Natural Resources iron briquette processing plant.



#### **4. Proposed Impacts (in water work, tree clearing, etc?)**

Five wetlands will be temporarily impacted. These impacts will be permitted through Nationwide Permit 12.

There will be minimal tree clearing within the allowed time frame to avoid conflict with roosting of the Indiana Bat and Northern Long Eared Bat in this area. Clearing will be limited to where trees, shrub and brush have encroached upon the easement and also within the temporary easement to allow for construction equipment to operate.

#### **5. Proposed BMP's**

A storm water plan will be developed for this site that will comply with Ohio's Rainwater and Land Development manual. This will include bridge crossings, BMPs strategically placed to prevent sediment from leaving the easement, stream protection, weekly and storm event inspections, soil segregation, wetland protection, and proper restoration practices.

#### **Maps that delineate the area of impact or work area:**

1. **Topographic:** Attached
2. **Aerial:** Attached

#### **Photographs:**



Wetland/upland complex at the southeast portion of project adjacent to railroad.



Residential area north of Corduroy Road.



Drainage ditch east of Otter Creek Road.



View of heavily disturbed area north of York Street.



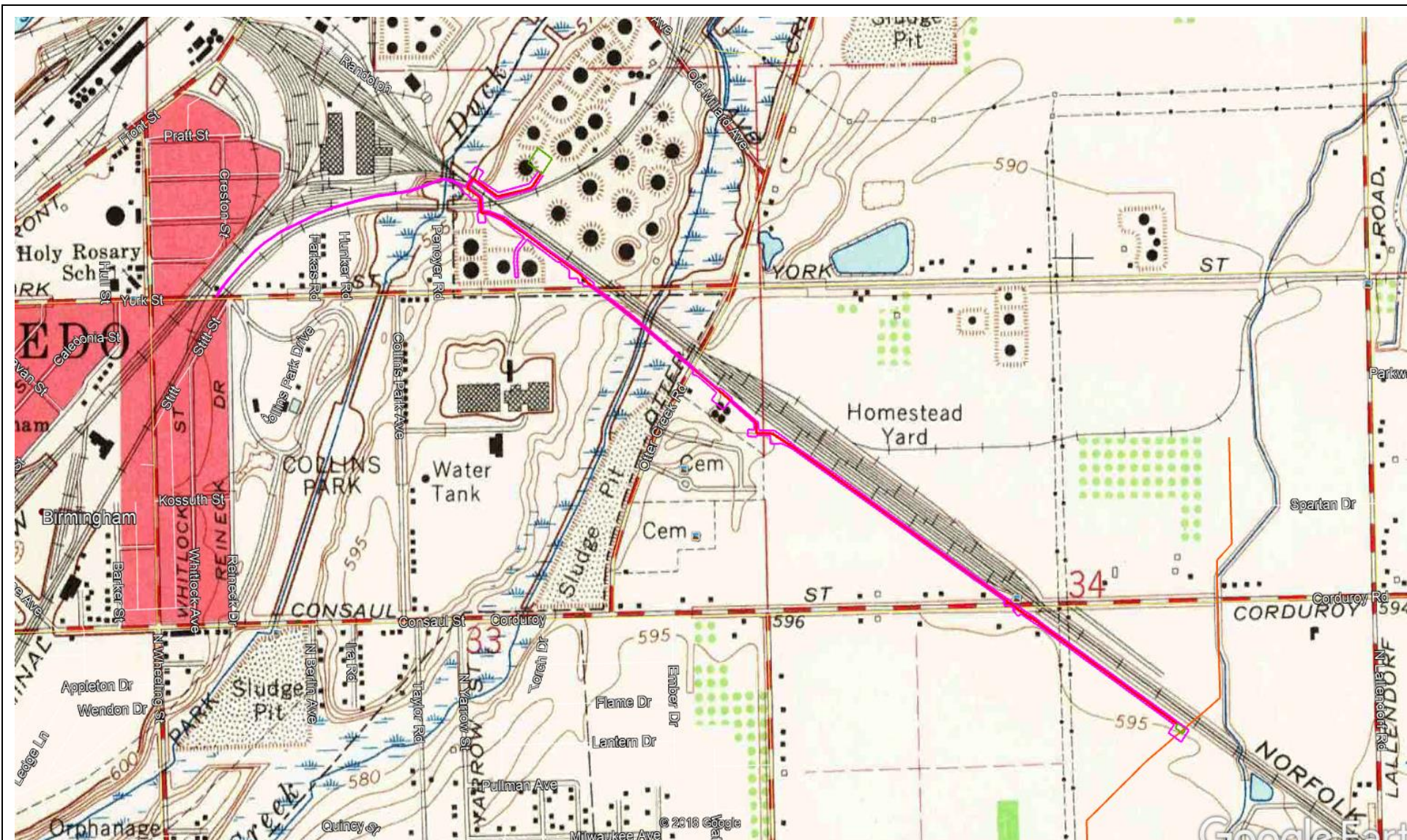
Area near western portion of project.



Area along railroad tracks along western portion of project.

**Shapefiles/KMZ: Attached**





**FIGURE 1 – USGS TOPOGRAPHIC MAP**

1:24,000 Oregon, OH Quadrangle (1965)

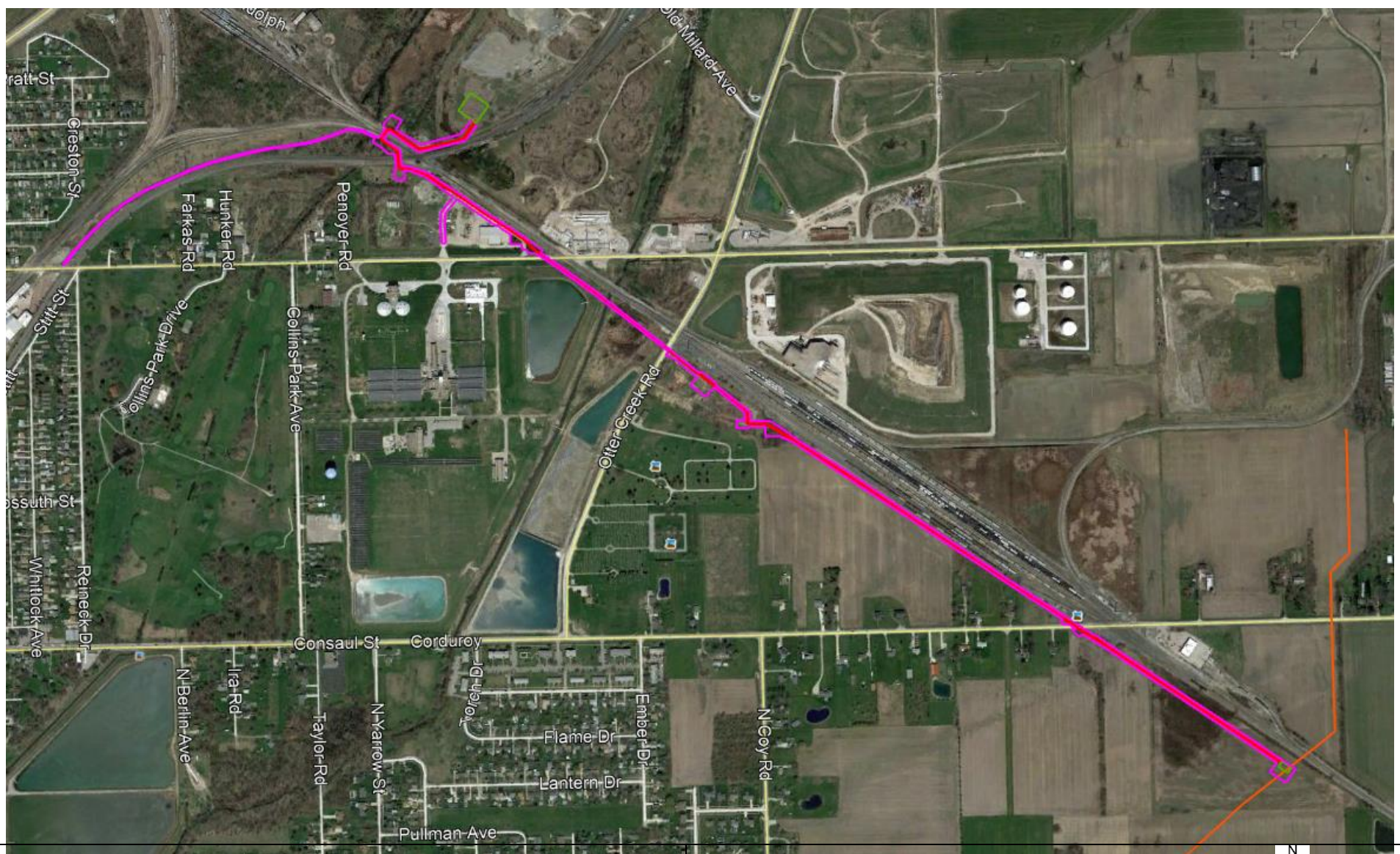


UTILITY TECHNOLOGIES  
INTERNATIONAL  
4700 HOMER OHIO LANE  
GROVEPORT, OH 43125  
P: 614-482-8080  
WWW.UTI-CORP.COM

**Site Name:** CNR Ironville Pipeline  
Generation Pipeline, LLC  
Lucas County, Ohio

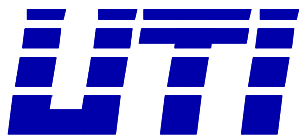
**Project Number:** 17031





**FIGURE 2 – Aerial Photograph**

Not to Scale Image Source: Google Earth Pro (2018)



UTILITY TECHNOLOGIES  
INTERNATIONAL  
4700 HOMER OHIO LANE  
GROVEPORT, OH 43125  
P: 614-482-8080  
WWW.UTI-CORP.COM

**Site Name:** CNR Ironville Pipeline  
Generation Pipeline, LLC  
Lucas County, Ohio

**Project Number:** 17031



# Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

**Office of Real Estate**  
*Paul R. Baldrige, Chief*  
2045 Morse Road – Bldg. E-2  
Columbus, OH 43229  
Phone: (614) 265-6649  
Fax: (614) 267-4764

June 27, 2018

Sean Pepper  
Utility Technologies International  
4700 Homer Ohio Lane  
Groveport, OH 43125

**Re:** 18-627; CNR Ironville Pipeline

**Project:** The proposed project involves the construction of a new 16-inch natural gas pipeline to service a single end user.

**Location:** The proposed project is located in the City of Toledo, Lucas County, Ohio.

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:** The Natural Heritage Database has the following records at or within a one-mile radius of the project area.

Blanding's turtle (*Emydoidea blandingii*), State threatened, federal species of concern  
Pearson Metropark – Toledo Metroparks

The review was performed on the project area you specified in your request as well as an additional one-mile radius. Records searched date from 1980. Additional comments on some of the features may be found in pertinent sections below.

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. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

**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 project is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees to include: shagbark hickory (*Carya ovata*), shellbark hickory (*Carya laciniosa*), bitternut hickory (*Carya cordiformis*), black ash (*Fraxinus nigra*), green ash (*Fraxinus pennsylvanica*), white ash (*Fraxinus americana*), shingle oak (*Quercus imbricaria*), northern red oak (*Quercus rubra*), slippery elm (*Ulmus rubra*), American elm (*Ulmus americana*), eastern cottonwood (*Populus deltoides*), silver maple (*Acer saccharinum*), sassafras (*Sassafras albidum*), post oak (*Quercus stellata*), and white oak (*Quercus alba*). Indiana bat roost trees consists of trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. However, Indiana bats are also dependent on the forest structure surrounding roost trees. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within the project area and trees must be cut, the DOW recommends cutting occur between October 1 and March 31. If suitable trees must be cut during the summer months, the DOW recommends a net survey be conducted between June 1 and August 15, prior to any cutting. Net surveys should incorporate either nine net nights per square 0.5 kilometer of project area, or four net nights per kilometer for linear projects. If no tree removal is proposed, this project is not likely to impact this species.

The project is within the range of the snuffbox (*Epioblasma triquetra*), a state endangered and federally endangered mussel, the eastern pondmussel (*Ligumia nasuta*), a state endangered mussel, the range of the rayed bean (*Villosa fabalis*), a state endangered and federally endangered mussel, the pondhorn (*Unio merus tetralasmus*), a state threatened mussel, the black sandshell (*Ligumia recta*), a state threatened mussel, the fawnsfoot (*Truncilla donaciformis*), a state threatened mussel, and the threehorn wartyback (*Obliquaria reflexa*), a state threatened mussel. Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size, this project is not likely to impact these species.

The project is within the range of the western banded killifish (*Fundulus diaphanus menona*), a state endangered fish, the lake sturgeon (*Acipenser fulvescens*), a state endangered fish, the channel darter (*Percina copelandi*), a state threatened fish, the American eel (*Anguilla rostrata*), a state threatened fish, and the greater redhorse (*Moxostoma valenciennesi*), a state threatened fish. The DOW recommends no in-water work from April 15 to June 30 to reduce impacts to indigenous aquatic species and their habitat.

The DOW has records within Otter Creek for the Blanding's turtle (*Emydoidea blandingii*), a state threatened species. This species inhabits marshes, ponds, lakes, streams, wet meadows, and swampy forests. Although essentially aquatic, the Blanding's turtle will travel over land as it moves from one wetland to the next. If work is proposed within Otter Creek, Duck Creek, or the adjacent wetlands, the DOW recommends that a habitat suitability survey be conducted by a DOW approved herpetologist. If suitable habitat is determined to be present, the DOW recommends that an avoidance/minimization plan be developed and implemented by the approved herpetologist.

The project is within the range of the spotted turtle (*Clemmys guttata*), a state threatened species. This species prefers fens, bogs and marshes, but also is known to inhabit wet prairies, meadows, pond edges, wet woods, and the shallow sluggish waters of small streams and ditches. Due to the location, and the type of habitat at the project site and within the vicinity of the project area, this project is not likely to impact this species.



The project is within the range of the Kirtland's snake (*Clonophis kirtlandii*), a state threatened species. This secretive species prefers wet fields and meadows. Due to the location, and the type of habitat at the project site and within the vicinity of the project area, this project is not likely to impact this species.

The project is within the range of the blue-spotted salamander (*Ambystoma laterale*), a state endangered species. Due to the location, and the type of habitat at the project site and within the vicinity of the project area, this project is not likely to impact this species.

The project is within the range of the piping plover (*Charadrius melodus*), a state endangered, and federally endangered bird, and the Kirtland's warbler (*Setophaga kirtlandii*), a state endangered and federally endangered bird. These species do not nest in the state but only utilize stopover habitat as they migrate through the region. Due to the location, and the type of work proposed, this project is not likely to impact these species.

The project is within the range of the American bittern (*Botaurus lentiginosus*), a state endangered bird. Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. Due to the location, and the type of habitat at the project site, this project is not likely to impact this species.

The project is within the range of the black tern (*Chlidonias niger*), a state endangered bird. The black tern prefers large, undisturbed inland marshes with fairly dense vegetation and pockets of open water. They nest in various kinds of marsh vegetation but cattail marshes are generally favored. Nests are built on top of muskrat houses or on top of floating vegetation. Due to the location, and the type of habitat at the project site, this project is not likely to impact this species.

The project is within the range of the common tern (*Sterna hirundo*), a state endangered bird. The preferred nesting sites of common terns are natural or man-made islands that are free of mammalian predators and human disturbance. They will also utilize mainland beaches and dredge disposal areas but only when islands are unavailable. The common tern nests in colonies. Their eggs are laid in a grass-lined depression in the sand. Due to the location, and the type of habitat at the project site, this project is not likely to impact this species.

The project is within the range of the king rail (*Rallus elegans*), a state endangered bird. Nests for this species are deep bowls constructed out of grass and usually hidden very well in marsh vegetation. Due to the location, and the type of habitat at the project site, this project is not likely to impact this species.

The project is within the range of the cattle egret (*Bubulcus ibis*), a state endangered bird. Cattle egrets are not strictly wetland birds. They often forage in dry pastures and fields. Egrets nest in colonies and will build a nest out of sticks and other materials wherever it can be supported. Due to the location, and the type of habitat at the project site, this project is not likely to impact this species.

The project is within the range of the lark sparrow (*Chondestes grammacus*), a state endangered bird. This sparrow nests in grassland habitats with scattered shrub layers, disturbed open areas, as well as patches of bare soil. In the Oak Openings area west of Toledo, lark sparrows occupy open grass and shrubby fields along sandy beach ridges. These summer residents normally migrate out of Ohio shortly after their young fledge or leave the nest. Due to the location, and the type of habitat at the project site, this project is not likely to impact this species.



The project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). Due to the location, and the type of habitat at the project site, this project is not likely to impact this species.

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

**Water Resources:** The Division of Water Resources has the following comment.

The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Your local floodplain administrator contact information can be found at the website below.

[http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List\\_8\\_16.pdf](http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf)

ODNR appreciates the opportunity to provide these comments. Please contact John Kessler at (614) 265-6621 if you have questions about these comments or need additional information.

John Kessler  
ODNR Office of Real Estate  
2045 Morse Road, Building E-2  
Columbus, Ohio 43229-6693  
John.Kessler@dnr.state.oh.us

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**11/14/2018 4:56:14 PM**

**in**

**Case No(s). 18-1601-GA-BLN**

Summary: Letter of Notification - Attachments F - I electronically filed by Mr. Michael J. Settineri on behalf of Generation Pipeline LLC