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February 26, 2014

Barcy F. McNeal
Secretary
Administration/Docketing
Public Utilities Commission of Ohio
180 East Broad Street, 11th Floor
Columbus, Ohio 43215

Re: *In the Matter of the Letter of Notification of Columbia Gas of Ohio, Inc. for a proposed pipeline replacement project known as the Maumee River Crossing Project in Maumee and Perrysburg, Ohio.*
Case No. 14-0228-GA-BLN

Dear Ms. McNeal:

Enclosed is an amendment to Letter of Notification filed by Columbia Gas of Ohio, Inc. ("Columbia") concerning a proposed pipeline project known as the Maumee-Perrysburg River Crossing Project (the "Project").

In Section (E)(1) of its Letter of Notification, Columbia proposed clearing the trees it identified in its bat habitat report, those which affected the habitat of the Indiana bat, prior to April 1. After the application was filed, Columbia received notification from the United State Fish and Wildlife Service ("USFWS") recommending that all trees and vegetation be cleared prior to or after the Indiana bat season. Therefore, Columbia is adopting the recommendation of the USFWS, and will be clearing all trees for the Project prior to April 1.

Thank you for your assistance in this matter and please do not hesitate to contact me with any questions.

Very truly yours,

/s/ Melissa L. Thompson

Enclosure



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

February 19, 2014

Aaron Geckle
URS
525 Vine Street, Suite 1800
Cincinnati, Ohio 45202

Re: Maumee-Perrysburg Crossing Project

Dear Mr. Geckle,

TAILS #: 03E15000-2013-TA-0122

This is in response to the request for technical assistance regarding the proposed clearing of forested habitat for Columbia Gas of Ohio's Maumee-Perrysburg Crossing Project in Lucas and Wood counties, Ohio.

There are no Federal wilderness areas, wildlife refuges, or designated critical habitat within the vicinity of the proposed site.

ENDANGERED SPECIES COMMENTS: The proposed project lies within the range of the **Indiana bat** (*Myotis sodalis*), a federally listed endangered species. A summer survey for the Indiana bat has not been conducted in the proposed project area to determine presence or probable absence of the species. Therefore, presence of the Indiana bat within the project area is assumed.

Summer habitat requirements for the species are not well defined but the following are considered important:

- (1) dead or live trees and snags with peeling or exfoliating bark, split tree trunk and/or branches, or cavities, which may be used as maternity roost areas;
- (2) live trees (such as shagbark hickory and oaks) which have exfoliating bark;
- (3) stream corridors, riparian areas, and upland woodlots which provide forage sites

According to the habitat assessment you provided, approximately 7.4 acres of young oak-mixed mesophytic forest along the Maumee River would need to be cleared to establish two construction workspaces for the project. Within these clearing limits, 46 potential Indiana bat

roost trees have been identified. Columbia Gas is proposing to clear the 46 potential roost trees between October 1 and March 31 to avoid impacts to roosting Indiana bats. Columbia Gas is also requesting our input on their proposal to clear the remaining 7.4-acres of forested habitat after March 31.

Based on the habitat assessment you provided, the 7.4 forested acres provide suitable riparian foraging habitat for the Indiana bat. Therefore, clearing of this habitat should not occur between April 1-September 30, when the species is assumed to be present.

An Indiana bat summer survey could be performed at the site in order to determine if Indiana bats are present. Should Columbia Gas choose to have a summer bat survey performed, no tree clearing should be initiated prior to the survey. Any survey should be designed and conducted in coordination with the Endangered Species Coordinator for this office. Surveyors must have a valid Federal permit.

The proposed project lies within the range of the **northern long-eared bat** (*Myotis septentrionalis*). Summer habitat requirements for the species are not well defined but the following are considered important:

- (1) Roosting habitat in dead or live trees and snags with cavities, peeling or exfoliating bark, split tree trunk and/or branches, which may be used as maternity roost areas;
- (2) Foraging habitat in upland and lowland woodlots and tree lined corridors;
- (3) Occasionally they may roost in structures like barns and sheds.

Based on the habitat assessment you provided, suitable roosting and foraging habitat for the northern long-eared bat occurs in the project area. Northern long-eared bats are known to utilize a wide range of tree species and tree sizes for roosting. Because northern long-eared bats often roost singly and roost in trees that are as small as three inches diameter at breast height, it is not feasible to identify all potential roost trees for this species in a forested area. Furthermore, the 7.4 forested acres to be cleared provides suitable foraging habitat for this species. Therefore, we recommend that any tree clearing should occur between October 1 and March 31 to avoid impacting this species.

A summer bat survey following the 2014 Indiana Bat Summer Survey Guidelines would document presence or probable absence of the northern long-eared bat. Any survey should be designed and conducted in coordination with the Endangered Species Coordinator for this office. Surveyors must have a valid Federal permit. Should Columbia Gas choose to have a summer bat survey performed, no tree clearing should be initiated prior to the survey.

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 Endangered Species Act of 1973, as amended, and are consistent with the intent of the National Environmental Policy Act of 1969 and the U. S. Fish and Wildlife Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed ESA section 7 consultation document.

If you have questions, or if we may be of further assistance in this matter, please contact Angela Boyer at extension 22 in this office.

Sincerely,



Mary M. Knapp, Ph.D.
Field Supervisor

cc: Nathan Reardon, ODNR, Division of Wildlife, nathan.reardon@dnr.state.oh.us
Jennifer Norris, ODNR, Division of Wildlife, jennifer.norris@dnr.state.oh.us

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Summary: Amended Application to the Letter of Notification for the proposed pipeline replacement project known as the Maumee River Crossing Project electronically filed by Ms. Melissa L. Thompson on behalf of Columbia Gas of Ohio, Inc.