EXHIBIT C

From: Applegate, Jeromy [mailto:jeromy_applegate@fws.gov]
Sent: Thursday, July 20, 2017 1:40 PM
To: Carter, Kim (Columbus) <Kim.Carter@stantec.com>
Cc: nhovis@nisource.com
Subject: Re: Sofidel Pipeline Project- Potential Roost Tree Assessment for Proposed Tree Clearing Areas

Hi Kim,

I have no objection to clearing these 10 trees at any time of the year. I do not anticipate impacts to Indiana bats or northern long-eared bats from the cutting of these 10 trees.

Thank you for coordinating this with us.

Jeromy

Jeromy Applegate
Fish and Wildlife Biologist
U S Fish and Wildlife Service
Ohio Ecological Services Field Office
4625 Morse Rd., Suite 104
Columbus, OH 43230
Phone: 614-416-8993 ext. 21
FAX: 614-416-8994

Stantec

Reference: Sofidel Pipeline Bat Habitat Assessment, TAILS #03E15000-2016-TA-0393

To:	Jeromy Applegate U.S. Fish and Wildlife Service Ohio Field Office, Columbus, Ohio	From:	Kim Carter Columbus, Office
File:	Sofidel Pipeline Project	Date:	July 19, 2017

Reference: Sofidel Pipeline Bat Habitat Assessment, TAILS #03E15000-2016-TA-0393

On behalf of Columbia Gas of Ohio (COH), Stantec Consulting Services Inc. (Stantec) completed a bat habitat assessment on an area (Assessment area) requiring tree clearing outside of the seasonal tree clearing timeline (October 1- March 30) within the Sofidel Pipeline Project (Project area). The Sofidel Pipeline Project is a natural gas pipeline project near Circleville, Pickaway County, Ohio that will provide natural gas to a new paper plant facility, Sofidel America. The Project is approximately 11.8 miles in length and includes the installation of a 12-inch diameter, coated steel, high pressure gas mainline (Attachment A – Figures). Construction of the Sofidel Pipeline Project began in February 2017 and almost all the trees were cleared prior to March 30 with the exception of one wetland area that was previously planned to be avoided using horizontal directional drilling (HDD). However, due to unsuitable subsurface conditions in this area, the HDD of the wetland was not feasible and COH amended the original authorization from the U.S. Army Corps of Engineers (USACE) to switch from HDD to open cut construction through the wetland area. COH received the amended authorization from the USACE on July 18, 2017 to temporarily impact the wetland during construction. COH is requesting to clear only the trees that are necessary to complete the new open cut construction of the Project.

Stantec received the initial U.S. Fish and Wildlife Service (USFWS) response letter on December 23, 2015 (Attachment B – Agency Coordination). It stated that the Project area was within the vicinity of one or more confirmed records of both Indiana bats (*Myotis sodalis*) and northern long-eared bats (*Myotis septentrionalis*). Due to the confirmed presence of both Indiana and northern long-eared bats, summer mist net surveys would not constitute presence/absence for these species. USFWS has given Stantec an opportunity to quantify and document all trees that will need to be cleared during the summer season and will evaluate whether they represent potential roost trees for Indiana or northern long-eared bats. This information is presented to USFWS for their consideration and decision on which, if any, trees proposed for clearing require an emergence survey to avoid direct impacts to Indiana bats and northern long-eared bats.

Bat Habitat Assessment

A bat habitat assessment was performed on July 14, 2017 by a Stantec biologist to determine if any potential roost trees are present within the Assessment area. The Assessment area is a palustrine emergent (PEM) wetland with several early to mid-successional trees scattered throughout, and is surrounded by active agricultural fields. The approximate location of the Assessment area is latitude N 39.5541° and longitude W -82.9767°. The nearest water source is the Scioto River, a perennial stream that is located less than one mile away from the location. There are 10 trees proposed for removal in the Assessment area. Eight trees are sycamore (*Platanus occidentalis*), one is a mulberry species (*Morus sp.*), and one tree is a black willow *(Salix nigra*). The diameter at breast height (dbh) ranged

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from 3 – 10.5 inches (Table 1). All trees were alive and healthy with no visible bat roost characteristics (as defined in the USFWS 2017 guidelines). Stantec did not identify any potential roost trees that bats may be using in the Assessment area.

Data collected during the habitat assessment is summarized in Table 1 below. A photograph log is provided in Attachment C and data forms are provided in Attachment D. Data forms completed were taken from the 2017 Range-wide Indiana Bat Summer Survey Guidelines, April 2017[1].

Table 1. Names, species, and characteristics of trees within the Assessment area on the Sofidel Pipeline Project, Pickaway County, Ohio.

Tree Number	Tree Species	Photo[1] Numbers	DBH[2] (inches)	Decay[3] status?	Exfoliating bark (%)	Cavities? Y/N	Potential Bat Roost Tree (Y/N)	Comments
01	Mulberry species	1, 2	3	1	0	N	N	
02	Sycamore	3, 4	4.5	1	0	N	N	
03	Sycamore	5,6	8.5	1	0	N	N	Multiple trunks
04	Sycamore	7,8	3	1	0	N	N	
05	Sycamore	9,10,11	10.5	1	0	N	N	
06	Sycamore	12,13	4	1	0	N	N	
07	Black Willow	14,15,16	6	1	0	N	N	Multiple trunks, largest was 6 inches DBH
08	Sycamore	17,18	4	1	0	N	N	Multiple trunks, largest was 4 inches DBH

[1]https://www.fws.gov/midwest/endangered/mammals/inba/surveys/pdf/2017INBASummerSurveyGuidelines9May2017.pdf, pages 14-15 and pages 40-41.

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Reference: Sofidel Pipeline Bat Habitat Assessment, TAILS #03E15000-2016-TA-0393

Tree Number	Tree Species	Photo[1] Numbers	DBH[2] (inches)	Decay[3] status?	Exfoliating bark (%)	Cavities? Y/N	Potential Bat Roost Tree (Y/N)	Comments
09	Sycamore	19,20	5	1	0	N	N	Multiple trunks, largest was 5 inches DBH
10	Sycamore	21,22	5	1	0	N	N	Multiple trunks, largest was 5 inches DBH

[1]Attachment C
[2]Diameter at breast height
[3]See page 40 of the 2017 Range-wide Indiana Bat Summer Survey Guidelines, April 2017

Summary

Based on the data collected during the bat habitat assessment of the trees proposed to be cleared for the open cut of the wetland, it is Stantec's professional opinion that the 10 trees present in the Assessment area did not exhibit characteristics of potential bat roost trees (as defined in the USFWS 2017 guidelines) and that Indiana and northern long-eared bats are not utilizing these trees as potential roosts. Please review the information above and provide your concurrence on Stantec's assessment of potential roost trees located within the Assessment area. If you require any other information to complete your review please let me know.

Stantec Consulting Services Inc.

Kim Carter
Project Manager
Phone: (614) 643-4357
Fax: (614) 486-4387
Kim.carter@stantec.com

Attachment: Attachment A: Figures
Attachment B: Agency Coordination
Attachment C: Site Photographs
Attachment D: Data Forms

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Reference: Sofidel Pipeline Bat Habitat Assessment, TAILS #03E15000-2016-TA-0393

Attachment A – Topographic Figure 1

EXHIBIT C

Figure No.
1

Title
Project Location and Topography

Client/Project
Columbus Gas of Ohio
Sofidel Pipeline Project

Project Location
Pickaway County
Ohio

193704120
Prepared by PM on 2015-12-22
Technical Review by JD on 2016-12-22
Independent Review by KC on 2016-01-04

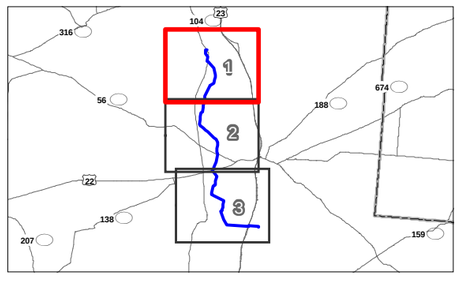
0 1,000 2,000 Feet

1:24,000 (At original document size of 11x17)

N

Legend

Preferred Sofidel Pipeline Route



Notes
1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
2. Data Sources Include: Stantec, Columbia Gas of Ohio, NADS
3. Background: USGS 7.5' Topographic Quadrangles

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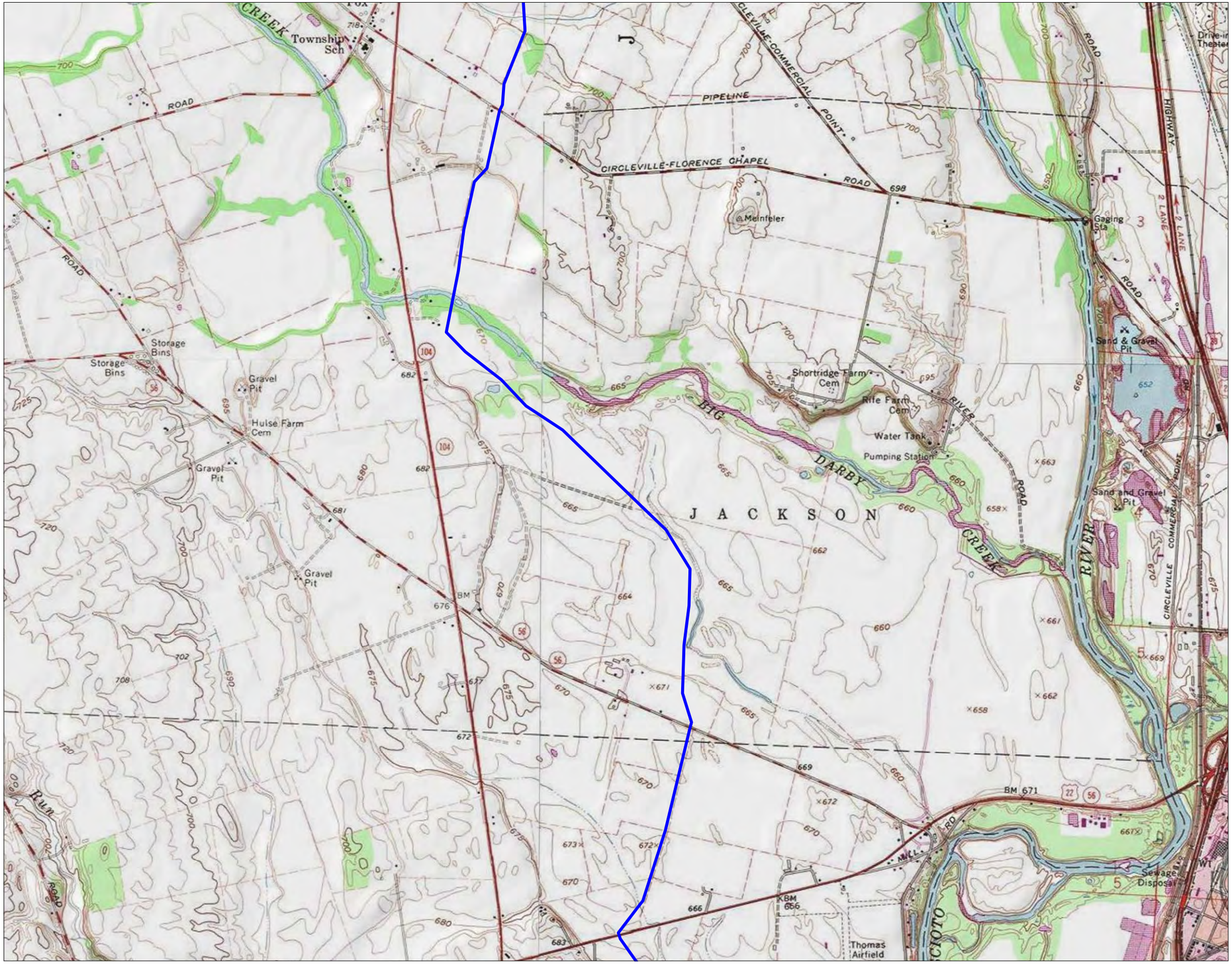


Figure No.
1

Title
Project Location and Topography

Client/Project
Columbus Gas of Ohio
Sofidel Pipeline Project

Project Location
Pickaway County
Ohio

193704120
Prepared by PM on 2015-12-22
Technical Review by JD on 2016-12-22
Independent Review by KC on 2016-01-04

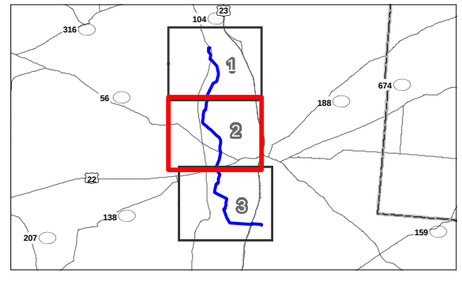
0 1,000 2,000 Feet

1:24,000 (At original document size of 11x17)

N

Legend

Preferred Sofidel Pipeline Route



Notes
1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
2. Data Sources Include: Stantec, Columbia Gas of Ohio, NADS
3. Background: USGS 7.5' Topographic Quadrangles

Stantec

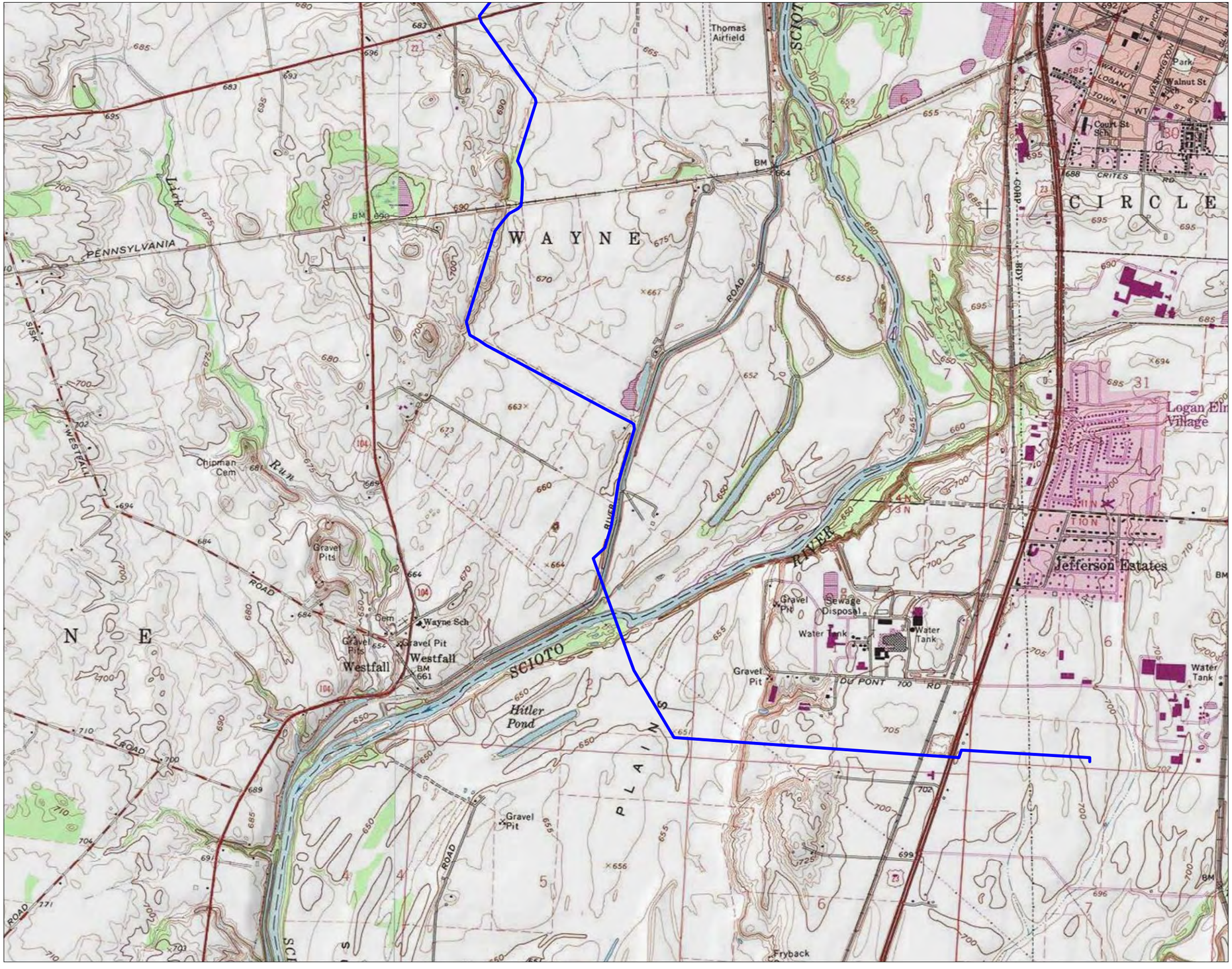


Figure No.
1

Title
Project Location and Topography

Client/Project
Columbus Gas of Ohio
Sofidel Pipeline Project

Project Location
Pickaway County
Ohio

193704120
Prepared by PM on 2015-12-22
Technical Review by JD on 2016-12-22
Independent Review by KC on 2016-01-04

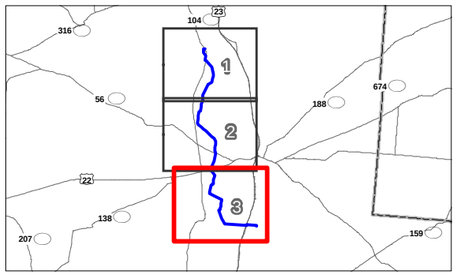
0 1,000 2,000 Feet

1:24,000 (At original document size of 11x17)

N

Legend

Preferred Sofidel Pipeline Route



Notes
1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
2. Data Sources Include: Stantec, Columbia Gas of Ohio, NADS
3. Background: USGS 7.5' Topographic Quadrangles

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Reference: Sofidel Pipeline Bat Habitat Assessment, TAILS #03E15000-2016-TA-0393

Attachment A – Aerial Figure 2

Figure No.
2

Title
Bat Habitat Assessment

Client/Project
Columbia Gas of Ohio
Sofidel Pipeline Project

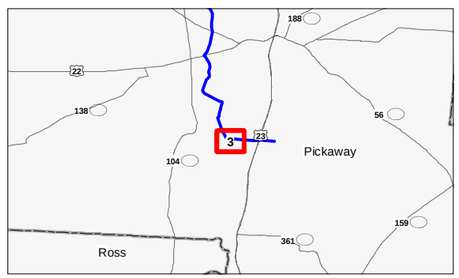
Project Location
Pickaway County, Ohio

193704120
Prepared by JD on 2017-06-08
Technical Review by DG on 2017-06-08
Independent Review by KC on 2017-06-08

0 200 400 Feet
1:4,800 (At original document size of 11x17)

N

Legend
- Preferred Sofidel Pipeline Route
- Access Road
- Set Back Area
- Staging Area
- Surface Sites
- Temporary ROW
- Permanent ROW
- Area of Bat Habitat Assessment



Notes
1. Coordinate System: NAD 1983 StatePlane Ohio South FIPS 3402 Feet
2. Data Sources Include: Stantec, Columbia Gas of Ohio, NADS
3. Orthophotography: 2015 Aerial Imagery

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Reference: Sofidel Pipeline Bat Habitat Assessment, TAILS #03E15000-2016-TA-0393

Attachment B – Agency Coordination

EXHIBIT C

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

December 23, 2015

Michelle Kearns
Stantec Consulting Services Inc.
1500 Lake Shore Drive Suite 100
Columbus, OH 43204-3800

TAILS# 03E15000-2016-TA-0393

Re: Columbia Gas of Ohio - Sofidel Pipeline Project, Pickaway County

Dear Ms. Kearns,

We have received your recent correspondence requesting information about the subject proposal. The proposed project involves the installation of approximately 11.6 miles of 12-inch diameter high pressure gas main pipeline. The pipeline will pass through Big Darby Creek and The Scioto River. 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 ≥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.

The proposed project is in the vicinity of one or more confirmed records of both Indiana bats and northern long-eared bats. Therefore, we recommend that trees ≥3 inches dbh be saved wherever possible. Because the project will result in a small amount of forest clearing relative to the available habitat in the immediately surrounding area, habitat removal is unlikely to result in significant impacts to these species. Since Indiana bat and northern long-eared bat presence in the vicinity of the project has been confirmed, clearing of trees ≥3 inches dbh during the summer roosting season may result in direct take of individuals. 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 tree removal is unavoidable, we recommend that removal of any trees ≥3 inches dbh only occur between October 1 and March 31. Following this seasonal tree clearing recommendation should ensure that any effects to Indiana bats and northern long-eared bats are insignificant or discountable. **Please note that, because Indiana bat and northern long-eared bat presence has already been confirmed in the project vicinity, any additional summer surveys would not constitute presence/absence surveys for these species.**

The proposed project lies within the range of five federally endangered fresh water mussels; **clubshell** (*Pleurbema clava*), **snuffbox** (*Epioblasma triquetra*), **northern rifflesheII** (*Epioblasma torulosa rangiana*), **rabbitsfoot** (*Quadrula c. cylindrical*) and **rayed bean** (*Villosa fabalis*). The proposed project will cross through The Scioto River, and Big Darby Creek. These two bodies of water contain suitable habitat for the five above listed mussels.

Due to the potential for this project to impact freshwater mussels, including five federally endangered species, **clubshell** (*Pleurbema clava*), **snuffbox** (*Epioblasma triquetra*), **northern rifflesheII** (*Epioblasma torulosa rangiana*), **rabbitsfoot** (*Quadrula c. cylindrical*) and **rayed bean** (*Villosa fabalis*), we recommend that a survey be conducted to determine if these species occur within the impact zones, Big Darby Creek and Scioto River, of the proposed project. The survey should be designed and conducted in coordination with the Endangered Species Coordinator for this office. Please note that mussel surveys may only be performed between May 1 and October 31 when the water temperature is at or above 60°F. The survey should be performed by a qualified, permitted surveyor (list enclosed).

If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), no work 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 for federally listed species to this office, 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.

If you have questions, or if we can be of further assistance in this matter, please contact Charlie Allen at Charles_allen@fws.gov or ext. 29 of our office (614) 416-8993.

Sincerely,

for Dan Everson
Field Supervisor

cc: Nathan Reardon, ODNR-DOW
Jennifer Norris, ODNR-DOW

EXHIBIT C

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

July 17, 2015

USFWS Permittees for Federally Listed Mussel Surveys in Ohio*

Steve Ahlstedt Independent Biological Consulting 57 Deer Ridge Road Norris, TN (865) 776-9510 bigshelldaddy@bellsouth.net	**ASTI Environmental** Ms. Dianne Martin 10448 Citation Drive, Suite 100 Brighton, MI 48116 (810) 225-2800/FAX (810) 225-3800 dmartin@asti-env.com
BHE Environmental Bruce Bauer 11733 Chesterdale Road Cincinnati, OH 45246 (513) 326-1500 bbauer@bheenvironmental.com	**Copperhead Environmental Consulting, Inc.** P.O. Box 73 11641 Richmond Road Paint Lick, KY 40461 (859) 925-9012 mwgumbert@copperheadconsulting.com
Gerald Dinkins Dinkins Biological Consulting, LLC P.O. Box 1851 Powell, TN 37849 (865) 938-7739 biodink@frontiernet.net	**Ecological Specialists, Inc.** Heidi Dunn 1417 Hoff Industrial Drive O' Fallon, MO 63366 (636) 281-1982 hdunn@ecologicalspecialists.com
Ecological Survey and Design LLC Jeff Grabarkiewicz 1517 W. Temperance Temperance, MI 48182 (734) 206-2685 unio@inbox.com	**Eco-Tech, Inc.** Peter Lee Droppelman 11321 Decimal Drive Louisville, KY 40299 (502) 259-0454 ldroppelman@ecotechinc.com

EXHIBIT C

Environmental Solutions and Innovations, Inc. Casey Swecker 4525 Este Avenue Cincinnati, OH 45232 (513) 451-1777 cswecker@environmentalsi.com	**EnviroScience Inc.** Greg Zimmerman and Marty Huehner 3781 Darrow Road Stow, OH 44224 (330) 688-0111 gzimmerman@enviroscienceinc.com
Don R. Helms Helms & Associates 814 North 7th Street Bellevue, IA 52031 (319) 872-4563 helmsdon@cis.net	**HMB Professional Engineers, Inc.** Ken Sperry 3 HMB Circle U.S. 460 Frankfort, KY 40601 (502) 695-9800 ksperry@hmbpe.com
Michael Hoggarth 1045 Hepplewhite Street Westerville, OH 43081-1115 (614) 823-1667 MHoggarth@otterbein.edu	**Douglas Kapusinski, Ph.D., PWS** U.S. Army Corps of Engineers, Buffalo District Stow, Ohio Field Office 1100 Graham Road Circle Stow, Ohio 44224 (330) 922-4263 Douglas.J.Kapusinski@usace.army.mil
Dr. Bob Krebs Dept. of Biological, Geological, & Environmental Sciences Cleveland State University 2121 Euclid Avenue Cleveland, OH 44115 (216) 523-7553 r.krebs@csuohio.edu	**Lewis Environmental Consulting** Chad Lewis 3967 Browns Grove Road Murray, KY 42071 (270) 435-4141 lewis_environmental@yahoo.com
Mainstream Commercial Divers, Inc. Craig Fortenbery Charlie Morgan 322 C. C. Lowry Drive Murray, KY 42071 (270) 753-9654 craig@mainstreamdivers.com charlie@mainstreamdivers.com	**Melody Myers-Kinzie** Commonwealth Biomonitoring 8802 West Washington Street Indianapolis, IN 46213 (317) 297-7713 myerskinzie@att.net

Ohio Department of Transportation Megan Michael 1980 West Broad Street Columbus, OH 43223 (614) 644-7099 megan.michael@dot.state.oh.us	**Brian O'Neill** 444 Lake Cook Road, Suite 18 Deerfield, IL 60015 (312) 772-3967 boneill@eaest.com
Redwing Ecological Services, Inc. Richard Fangman 1139 South Fourth Street Louisville, KY 40203 (502) 625-3009 kfuchs@redwing.win.net	**Stantec** Cody Fleece 11687 Lebanon Road Cincinnati OH 45241-2012 (513) 842-8238 cody.fleece@stantec.com
John Tetzloff 2726 Camden Road Upper Arlington, OH 43221 (614) 288-0313 jftetzloff@aol.com	**Third Rock Consultants, LLC** Ed Hartowicz 2514 Regency Road, Suite 104 Lexington, KY 40503 (859) 977-2000 ehartowicz@thirdrockconsultants.com
Tom Watters Museum of Biological Diversity 1315 Kinnear Road Columbus, OH 43212 (614) 292-6170 watters.1@osu.edu	**TRC Companies, Inc** Rebecca Winterringer 1382 West Ninth Street, Suite 200 Cleveland, OH 44113 (216) 403-6041 rwinterringer@trcsolutions.com
Western Ecosystems Technology, Inc Travis Brown 408 West 6th Street Bloomington, IN 47404 (812) 339-1756, ext.2 tbrown@west-inc.com	**Dave Zanatta, Ph.D.** Institute for Great Lakes Research Biology Department Central Michigan University 335 Brooks Hall Mount Pleasant, MI 48859 (989) 774-7829 zanat1d@cmich.edu

*This list reflects permit data available as of July 17, 2015, and is subject to periodic revision. Some permits may include additional individuals not listed above.

Summary: Exhibit C (Part 1) to Correspondence regarding engineering adjustment electronically filed by Cheryl A MacDonald on behalf of Columbia Gas of Ohio, Inc.