Approved December 2016 by the membership of
The Student Chapter of The Wildlife Society at Virginia Tech

22 December 2016

Public Comments Processing
Attn: Docket No. CP16-10-000
Federal Energy Regulatory Commission
Office of Energy Projects
888 First Street, NE
Washington, DC 20426
Submitted online at: https://ferconline.ferc.gov/eFiling.aspx

RE: Request for Public Input on Draft Environmental Impact Statement for Mountain Valley Project by Mountain Valley Pipeline, LLC, Docket No. CP16-10-000

Dear Reviewer,

The Student Chapter of The Wildlife Society at Virginia Tech (VT TWS), founded in 1963, serves as the professional organization for students studying wildlife conservation and natural resources at Virginia Tech. We share the parent chapter's dedication to excellence in wildlife stewardship through science and education. We support the parent chapter's mission to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation.

As diligent proponents for the use of sound science in decision-making, VT TWS would like to emphasize the importance of the Draft Environmental Impact Statement (DEIS) for the proposed Mountain Valley Project (MVP). Responsible stewardship of wildlife resources requires critical scientific examination of the MVP. In accordance with the National Environmental Policy Act of 1969, as amended (NEPA), the Federal Energy Regulatory Commission (FERC) must prepare a DEIS demonstrating sufficient avoidance and mitigation of detrimental impacts to wildlife resources during the construction and operation of the MVP.

FERC cannot authorize the currently proposed DEIS due to its insufficient methods for management, monitoring, and mitigation of MVP's impacts to wildlife and their habitats. These methods as proposed would jeopardize effective professional stewardship of wildlife resources and the long-term persistence of local wildlife populations.

The biological surveys indicated in the DEIS lack sufficient explanation to discern the methods used to assess wildlife and associated habitat. To determine whether the biological surveys conducted by FERC meet professional peer-reviewed standards, detailed information regarding survey design, methods, and results should be included within the DEIS and made accessible to

the public. Both pre- and post-construction surveys will require robust study designs to provide sufficient insight into impacts to wildlife and associated habitat.

Without detailed survey design information, future efforts to mitigate MVP's impacts to wildlife will not include a scientific standard for comparison. This missing information will create a significant hindrance to professional wildlife managers and result in improper management of a public resource by jeopardizing the persistence of wildlife populations.

Furthermore, all missing or incomplete surveys (DEIS p. 4-183, 4-191) must be completed and incorporated into the DEIS prior to approving the MVP. Excluding these surveys from consideration during the public comment period does not accurately represent necessary information to stakeholders or permit authorities.

To prevent conflict of interest and promote objective results, reliable third-party groups should complete biological surveys instead of FERC, MVP, or Equitrans employees. Especially regarding wetland restoration, citing FERC's own experience with other wetland restoration projects (DEIS p. 4-161) does not represent an objective scientific opinion or a reliable restoration estimate. Incorporating research from other sources would improve FERC's mitigation propositions and provide the public and permit authorities with confidence in reviewing MVP's impacts to wildlife resources.

The DEIS indicates that species proposed or under review for listing under the Endangered Species Act of 1973, as amended (ESA), will be regarded as listed species (DEIS p. 4-182) and therefore qualify for official consultations as required in ESA Section 7(a)(2). The tri-colored bat (*Perimyotis subflavus*) has been petitioned for listing under ESA Threatened status due to severe population declines across its range. Virginia Department of Conservation and Recreation (VDCR) surveys discovered tri-colored bats in two caves expected to be impacted by the MVP, Slussers Chapel Cave and Canoe Cave (DEIS p. 4-158 to 4-159). The DEIS indicates the need for consultation with the Virginia Department of Game and Inland Fisheries (VDGIF) regarding tri-colored bats (DEIS p. 4-192). We not only emphasize the importance of consultation with VDGIF, but also stress the Section 7 legal obligation to consult with the U.S. Fish and Wildlife Service (FWS) regarding MVP impacts to tri-colored bats. These consultations should occur prior to approval of the MVP, and their findings should be incorporated into a revised DEIS subject to another public comment period for reasons stated above.

The DEIS fails to evaluate the scope of MVP impacts to amphibians, especially woodland salamanders. This omission inappropriately assesses wildlife resources in southwestern Virginia's globally-recognized hotspot for salamander diversity. An ongoing long-term study in Jefferson National Forest along Craig Creek Road, near a proposed area for MVP impacts, has observed significant impacts to salamander populations following any silvicultural forest disturbance. These results should be considered when implementing mitigation measures, and precautions should be exercised to prevent MVP impacts to the active research area and a sufficient buffer surrounding it.

MVP construction and operation will significantly impact multiple species of woodland salamanders, and therefore pre- and post-impact studies will be necessary to ensure effective

management of these wildlife resources. A third party unaffiliated with MVP approval should perform these studies. A revised DEIS providing for sufficient pre- and post-impact amphibian studies should be submitted for another public comment period prior to approval of the MVP.

Due to the above considerations, we strongly urge FERC to submit an extensively revised DEIS addressing the above concerns and to open another public review and comment period on the new DEIS prior to authorizing the MVP.

Considering the above revisions with high priority, VT TWS would like to bring attention to the following positive aspects of the DEIS, and encourages their elaboration and implementation in future revisions of the DEIS.

Communication with FWS, VDGIF, VDCR, and other associated natural resource agencies will be the strongest asset to the success of this project. These organizations' policies reflect current scientific data and professional peer-reviewed practices, making them essential resources for effective mitigation of impacts to wildlife.

Extensive habitat loss has caused declines in pollinator species nationwide. Therefore, we strongly support the proposed use of native seed mixes to promote the growth of pollinator habitat along the MVP corridor. We suggest that the DEIS provide for post-treatment monitoring so that invasive species do not colonize the affected area and to ensure that pollinator habitat is effectively established along the MVP.

Collocating the MVP route with existing corridors will reduce habitat fragmentation and protect surrounding landscapes. We urge MVP to maximize opportunities to use existing corridors and avoid impacting intact ecosystems, especially those of high biological significance and conservation concern. Landscapes currently free from fragmentation occur infrequently in the eastern United States, and since undisturbed wilderness and management areas provide crucial resources for many species' survival, we strongly advocate for MVP placement that completely avoids otherwise undisturbed habitat.

Thank you for considering the recommendations of aspiring wildlife professionals and for incorporating sound science into DEIS decision-making. Please contact Allison Moser, President of VT TWS, at allym7@vt.edu or (571) 420-2854 if you require further information or have any additional questions.

Sincerely,

Allison M. Moser
President

On behalf of the Student Chapter of the Wildlife Society of Virginia Tech