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General Comment

Amphibian populations are declining worldwide, and amphibians are experiencing high extinction rates due to habitat loss, chytrid fungus, pollutants, pesticides, invasive species, and climate change. Amphibians are the most threatened class of vertebrates and merit attention in the License Renewal for North Anna Power Station Units 1 and 2 Site Specific Environmental Impact Statement (EIS). It appears that the EIS does not evaluate alternative effects on amphibians although forest habitat, wetland habitat, and water bodies are present.

In terms of climate change, the proposed action provides climate change benefits because nuclear electric power facilities do not generate large quantities of greenhouse gas emissions that would be produced by coal-fired or natural gas electric generation facilities. Reduced greenhouse gas emissions would benefit amphibians by reducing amphibian habitat changes due to climate change. Dominion Energy Virginia should continue to pursue an “aggressive solar strategy” and develop off-shore wind power facilities that would also provide climate change benefits.

The EIS should discuss amphibians potentially occurring at or near the North Ana Power Station Units 1 and 2. The following specific sections should be revised to address amphibians:

- Section 3.6.3 should include a description of amphibian species known to occur or potentially occur at or near the North Ana Power Station Units 1 and 2. A wide variety of amphibian species occur in eastern Virginia, such as the eastern cricket frog (*Acris crepitans*) and red salamander (*Pseudotriton ruber*).
- Section 3.6.4.3 should identify potential effects of cooling systems and cooling ponds on amphibians.
- Section 3.6.4.3 should include an amphibian monitoring program to track amphibian population trends.

Thank you for this opportunity to comment.

References:

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