**Comments for the EA on Orphan Wells and Abandoned Mine Project**

In addition to the comments I submitted with Heather Cantino on 1/18/22, I have additional questions regarding other federal laws dealing with possible land and water disturbances. Stream capture projects as mentioned in the EA, reroutes, roads through streams, possible effects to perennial streams require NPDES permits if any discharge will affect any water source. Since the EA does not have any information regarding any methods of reclamation it calls to question if other permits are required when considering a project.

Are 401 or 404 permits required to comply with the Clean Water Act or jurisdictional waters? The EA states that wetlands could be affected, ephemeral streams and perennial streams. All of those activities normally require jurisdictional determination prior to application for 401 and or 404 permits. I am not referring to just storm water management. Is an antidegradation analysis needed/required both state and federal?

Will a mine reclamation activity require SMCRA, Surface Mining Control and Reclamation Act, rules? Does the FS have to comply with any Abandoned Mine Land rules? There was no mention of how the FS works with these regulatory agencies for compliance with federal laws and rules.

These comments emphasize the need for more information regarding the projects before any project is chosen for reclamation.

Submitted by

Roxanne Groff

Amesville Ohio

ACFAN