

Data Submitted (UTC 11): 1/19/2022 10:33:45 PM

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Comments: I am extremely concerned that the new Orphan Well and Abandoned Mine Project Environmental Assessment (EA) issued by the Wayne on Dec. 21 states that the Wayne needs to exempt itself from stipulations in its Forest Plan that require protection of old-growth forests, endangered Indiana bats, wetlands, and "sensitive species habitats," so it can "be in compliance" with its Plan. The initial announcement for the current project, including a scoping document issued in August, 2021, makes no mention of Wayne plans to request exemptions from Plan rules.

The public has a critical interest in knowing what has been done before to cap abandoned mines, the environmental impact of those actions (both positive and negative) and specifics of the proposed plan to cap additional wells going forward. Specifically:

How many wells have been capped/plugged under the current plan? What is their condition? What was the cost of each? Has the capping/plugging been effective? How much disturbance of soil, wetlands, and vegetation (quantified by carbon emissions, acreage, tree volume, species, and number) was required to achieve these results?

How are the wells slated for intervention being prioritized? What are the environmental costs and benefits (including GHG emissions, destruction of habitat and wetlands, logging, road building, and soil compaction) of each intervention? Why hasn't the Forest Service shared the maps and emissions data of wells to be plugged or capped? This must happen immediately.

Since I strongly disagree with WNF exempting itself from avoiding destruction of "mature" and old-growth trees, bat and other sensitive species habitat, and wetlands, how can I protest that decision? These are precious Forest resources that should be protected. (The Wayne has a history of logging 60-80 year-old trees, selling them at give-away prices to the logging industry, having labeled them "mature," though these trees are young in terms of their natural lifespans of 200-400 years or more.) We know so much more now about the intimate cross-species inter-relatedness in the forest that are vital to its health.

Certainly capping wells is important, but it must be done safely and with all due diligence to protect our forest and NOT exempt the Wayne from protecting what it is charged with protecting.