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First name: Ginny

Last name: Masullo

Organization:

Title:

Comments: Power line Easement: The easement and accompanying service road will extend 3.7 miles over Forest Service and Cherokee Wildlife Management Area land, climbing an elevation of more than 1,500 ft. The base of operations are located on the valley floor within one mile of AR Hwy 28 and a rail line. The NEPA plan needs to justify the disturbance and herbicidal maintenance required, of USFS and WMA lands given the proximity of existing infrastructure.

Water Quality Considerations: Acid mine drainage, e.g. elevated concentrations of sulfate, iron, aluminum, and other potentially toxic metals have been common to small mines in Appalachia. The extent of similar issues in the western Arkansas River Valley should be available from the Arkansas Coal Project administered by the Arkansas Department of Environmental Quality (DEQ). They have completed 157 reclamation projects. In addition, water tables, groundwater flows, overburden runoff, and water quality baselines for nearby streams and the Poteau River should be addressed in the NEPA plan.

Climate Impact: The coal is not intended for domestic use, but will be transported overseas for "coking." In addition to the CO<sub>2</sub> impacts of the coal and its transport, the mine will produce significant methane, also a significant greenhouse gas. We suggest the NEPA plan consider USFS policy in reference to the Forest Service Strategic Framework for Responding to Climate Change.

Cherokee Wildlife Management Area: A portion of the "private" listed in the proposal overlays part of the Cherokee WMA by at least two square miles. The NEPA plan should consider WMA impact in addition to USFS impact.