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Comments:

I am submitting formal objections to the Draft Environmental Assessment (EA) for the proposed quartz mining nominations within the Jessieville-Winona-Fourche Ranger District. Based on a detailed review, the EA does not meet NEPA's requirement to take a "hard look" at environmental and public health impacts. The deficiencies in purpose and need, alternatives, project scope, and air quality analysis are significant and must be addressed before any decision is made.

First, the EA fails to establish a legitimate, evidence-based purpose and need. The document relies on broad references to the Mining and Minerals Policy Act of 1970 and vague "market conditions," yet provides no data demonstrating a regional shortage of quartz, no analysis of supply-demand necessity, and no justification for why this specific area of the Ouachita National Forest must be developed. A speculative resource opportunity does not constitute a demonstrated public need. As written, the purpose serves a private project proponent rather than a clearly defined public or economic necessity.

Second, the EA does not present a reasonable range of alternatives. It effectively creates a false choice between the Proposed Action and a No Action Alternative, with only minor modifications between them. There is no meaningful evaluation of reduced-scale mining, relocation of operations away from sensitive watersheds, or phased development approaches that could minimize environmental harm. This narrow framing limits informed decision-making and does not satisfy NEPA's requirement to rigorously explore reasonable alternatives.

Third, the scope of the project is understated and potentially misleading. While the EA identifies two tracts as "competitive sale" sites, it also authorizes six additional tracts under prospecting permits. The document explicitly acknowledges that these prospecting sites may transition into full-scale open-pit mining operations if viable deposits are confirmed. This is not a two-site project-it is a proposal that establishes up to eight potential mining operations. Downplaying this scope obscures the cumulative environmental impact, particularly within the Upper North Fork Saline River watershed, which includes the Paron area.

This watershed is not incidental-it is a sensitive and already stressed system. The EA itself acknowledges that runoff from the Paron-area tracts flows into Cypress Creek and Trace Creek, which feed directly into the North Fork of the Saline River. This river system has been identified as ecologically significant, supports sensitive aquatic species, and includes segments already listed as impaired. Increased sediment and disturbance in this watershed have real consequences for downstream water quality, habitat integrity, and long-term ecosystem stability. While these sites do not drain into Lake Winona, they directly impact the Saline River system, which is itself a designated conservation priority. The EA does not adequately address the cumulative and downstream effects of concentrating multiple mining operations within this watershed.

Most critically, the EA fails to analyze air quality impacts associated with quartz mining. The document contains no modeling of particulate emissions (PM10 or PM2.5), no dispersion analysis, and no evaluation of downwind exposure to nearby residents, including those in and around Paron. It does not require baseline or operational air monitoring, nor does it establish any enforceable thresholds or mitigation triggers. Additionally, the EA does not evaluate appropriate setback distances or account for site-specific factors such as prevailing winds, terrain, or vegetation that influence dust transport.

This omission is unacceptable given the nature of the activity. Quartz mining inherently generates respirable crystalline silica, a known cause of silicosis, a debilitating and irreversible lung disease, and a classified human carcinogen. The absence of any meaningful air quality analysis represents a critical failure to assess a primary

human health risk associated with the project. Erosion and sediment controls for water do not address airborne exposure. Without modeling, monitoring, or protective buffers, there is no basis to conclude that nearby communities are protected.

Taken together, these deficiencies indicate that the EA does not provide a sufficient basis for informed decision-making. It minimizes the scale of the project, fails to justify its necessity, limits alternatives, and omits analysis of a well-documented health hazard.

For these reasons, I formally request that the Forest Service:

1. Revise the purpose and need statement to include objective, evidence-based justification specific to this project;
2. Develop and evaluate a full range of reasonable alternatives, including reduced-scale and watershed-protective options;
3. Accurately characterize the full scope of potential mining activities across all tracts and assess cumulative impacts accordingly;
4. Conduct a comprehensive air quality analysis, including particulate emissions modeling, dispersion analysis, required monitoring, and scientifically supported setback distances.

Additionally, I request clear, written responses to the following:

- What analysis, if any, was conducted regarding PM10/PM2.5 emissions and respirable silica exposure?
- Will baseline and ongoing air quality monitoring be required at or near these sites?
- What criteria will be used to establish protective setback distances for nearby residents and public areas, particularly in the Paron community?

Until these issues are fully addressed, approval of this project would be premature and unsupported by the level of analysis required under NEPA.