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Comments: The Saline River Watershed Alliance (SRWA) respectfully submits the following comments regarding the Environmental Assessment for Project #63480, Mining Nominations Jessieville-Winona-Fourche within the Ouachita National Forest.

SRWA is a watershed organization dedicated to protecting the ecological health, water quality, and recreational value of the Saline River and its tributaries in central Arkansas. Our comments focus specifically on the potential impacts of the proposed mining nominations on the upper Saline River basin.

After reviewing the Environmental Assessment and associated materials, SRWA supports the No Action alternative.

Several of the nominated tracts occur within steep forested terrain that contains headwater streams draining toward tributaries of the Saline River. Disturbance in these upper catchments presents a heightened risk of sediment delivery to downstream waters because mountain headwater systems rapidly transport sediment during storm events.

Mining activities associated with quartz extraction typically involve excavation, spoil placement, haul road construction, and heavy equipment use. In steep Ouachita Mountain terrain, these activities can significantly increase erosion and sediment transport into nearby streams. Even modest increases in fine sediment can degrade aquatic habitat by embedding gravel substrates, reducing oxygen exchange in streambeds, and impairing spawning habitat for fish and freshwater mussels.

These concerns are amplified because the Saline River system has special ecological status within Arkansas. The Alum, Middle, North, and South Forks of the Saline River, along with Ten Mile Creek, have been recognized by state resource agencies as Extraordinary Resource Waters and ecologically sensitive waterbodies due to their exceptional water quality and important aquatic habitat.

These waters support diverse aquatic communities and sensitive species that depend on stable, sediment-free stream conditions. Increased sedimentation in headwater tributaries could negatively affect downstream habitat quality and ecological integrity within the Saline River basin.

SRWA also encourages the Forest Service to evaluate cumulative watershed impacts associated with the nominated tracts. In the Ouachita Mountains, forest roads, recreational use, storm-driven erosion, and other land disturbances already contribute sediment to headwater systems. Mining activities would add an additional disturbance source within the same watershed network.

A parcel-by-parcel analysis alone may not adequately capture the broader watershed implications where multiple tracts affect the same drainage system. The Environmental Assessment should therefore include a comprehensive watershed-scale evaluation of sediment transport risk and downstream impacts.

At a minimum, SRWA requests that the Forest Service carefully evaluate:

- * sediment and erosion risks associated with excavation, spoil areas, and haul roads
- * impacts to headwater tributaries draining toward the Saline River basin
- * potential effects on Extraordinary Resource Water segments and ecologically sensitive stream systems
- * impacts to aquatic species dependent on clean gravel substrates, including fish and freshwater mussels

* cumulative watershed effects when mining disturbance is considered alongside existing land uses

Protection of headwater streams is critical to maintaining the long-term ecological integrity of the Saline River system. Because these upper basin areas function as the source waters for downstream aquatic habitat and water quality, disturbance in these locations can have far-reaching effects.

For these reasons, the Saline River Watershed Alliance urges the Forest Service to select the No Action alternative for Project #63480.

Thank you for the opportunity to provide comments on this proposal.