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Mike Welker, NEPA Coordinator Jessieville-Winona-Fourche Ranger District Ouachita National Forest
michael.welker@usda.gov

Re: Draft Environmental Assessment - Mining Nominations, Garland and Saline Counties, Arkansas (Project No. 63480)

Dear Mr. Welker and the Responsible Officials:

I am writing to submit formal comments in opposition to both the Proposed Action and Alternative Action described in the April 2026 Draft Environmental Assessment (EA) for the Mining Nominations project on the Ouachita National Forest. While I recognize the Forest Service's obligation to consider mineral development requests under the 1970 Minerals Policy Act, I respectfully submit that the environmental costs of the proposed quartz mining operations [mdash] particularly the documented risks to drinking water quality for hundreds of thousands of central Arkansas residents [mdash] are too significant to justify approval of either alternative as currently presented.

I. THE PROPOSED ACTION AND ALTERNATIVE A POSE AN UNACCEPTABLE RISK TO DRINKING WATER SUPPLIES FOR CENTRAL ARKANSAS

The EA itself acknowledges that the proposed mining tracts drain directly into two of central Arkansas's most critical drinking water sources: Lake Ouachita and Lake Winona.1

Lake Ouachita

Lake Ouachita serves as the primary raw water source for the City of Hot Springs, which withdraws up to 23 million gallons per day to supply more than 100,000 people in the metropolitan area.2 It also serves the North Garland County Regional Water District.3 Lake Ouachita is classified as an oligotrophic lake [mdash] characterized by exceptional water clarity and low nutrient and sediment levels [mdash]4 which makes it unusually sensitive to increases in turbidity and total suspended solids (TSS).5 The EA confirms that tracts OQC-246P, OQC-257P, and OQC-287P all drain directly into Lake Ouachita,6 and that the Proposed Action results in a HIGH risk rating for sediment delivery in the Big Blakely Creek-Lake Ouachita sub-watershed.7

Lake Winona

Lake Winona is equally critical. It supplies approximately 21 million gallons per day to roughly 160,000 people across an 8-county service area through Central Arkansas Water (CAW), serving Little Rock, North Little Rock, surrounding municipalities, the State Capitol, major hospitals, the Little Rock National Airport, and the Little Rock Port Authority.8 CAW has explicitly stated it cannot operate its water system without the Winona Water Supply.9 The EA confirms that the Proposed Action results in a HIGH risk rating for the Upper North Fork Saline River sub-watershed, which drains into the Winona system.10

The mining of quartz [mdash] an extractive, open-pit industrial operation [mdash] in the watersheds that feed these reservoirs presents a direct and documented threat to public health.

II. THE EA'S OWN SEDIMENT MODELING DEMONSTRATES UNACCEPTABLE RISK

The Aquatic Cumulative Effects (ACE) model results presented in Table 3.3 of the EA are deeply troubling and, standing alone, justify denial of the Proposed Action:

*
* Big Blakely Creek-Lake Ouachita: Sediment delivery increases from a baseline of 416 tons/year to 1,688 tons/year under the Proposed Action [mdash] a 629% increase [mdash] with the risk rating rising from Moderate to HIGH.11
* Upper North Fork Saline River: Sediment delivery increases from a baseline of 774 tons/year to 2,197 tons/year under the Proposed Action [mdash] a 1,335% increase [mdash] with the risk rating rising from Low to HIGH.12

While Alternative A reduces some of these figures, it does not eliminate the danger. Under Alternative A, the Upper North Fork Saline River risk remains elevated (Low to Moderate), representing a 1,277% increase in sediment over baseline conditions.13 The EA itself acknowledges that sediment loading increases treatment times, drives up energy costs, shortens filter media life, increases chemical usage, and raises treatment costs ultimately passed on to consumers14 [mdash] including, as the EA notes, lower-income communities disproportionately served by the Lake Winona system.15

Furthermore, the EA documents that previous sediment loading events at Lake Winona have already caused CAW to purchase replacement water from Hot Springs Village [mdash] water that, due to differences in water chemistry, has caused exceedances in water quality standards for heavy metals in tap water. Permitting additional industrial mining operations in the same watershed knowingly risks repeating and worsening this outcome.16

III. THE ALUM FORK SALINE RIVER WATERSHED DESERVES SPECIAL PROTECTION

The EA identifies the Alum Fork of the Saline River as a Priority Watershed under the National Watershed Condition Framework, with a signed watershed restoration plan representing approximately $8 million in past and future expenditures.17 The Alum Fork is listed on the EPA's 2022 303(d) list of impaired waters for low pH and is also on the Arkansas Department of Energy and Environment's 2026 draft 303(d) list.18 Opening additional industrial mining operations in an already-impaired, heavily-invested watershed undermines the conservation efforts of multiple agencies and conflicts directly with the stated goals of the Forest Service's own watershed restoration plan.

IV. IMPACTS TO THREATENED, ENDANGERED, AND SENSITIVE SPECIES COMPOUND THE HARM

The EA discloses that this project is "likely to adversely affect" the Northern Long-eared Bat, a species proposed for uplisting to Endangered status,19 and "may affect" the Indiana Bat (Endangered), the Arkansas fatmucket mussel (Threatened), and the Rabbitsfoot mussel (Threatened).20 Additional sensitive species in the project area include the Ouachita madtom and Southern hickorynut mussel, among others dependent on the water quality of the Saline River system.21 Approving mining operations that the Forest Service's own analysis confirms will increase sedimentation at high risk levels compounds harm to these already-imperiled species.

Additionally, because of the EA's finding that the NLEB is likely to be adversely affected, a Biological Opinion is required from the Secretary of the EPA regarding the proposed action before further action can be taken.22

V. THE EA IS INSUFFICIENT TO SUPPORT APPROVAL OF EITHER ALTERNATIVE

For a project with this scale of potential impact on public drinking water supplies serving hundreds of thousands

of people, a full Environmental Impact Statement (EIS) [mdash] not merely an Environmental Assessment [mdash] is warranted. The significance thresholds under NEPA (40 C.F.R. [sect] 1501.3) include consideration of impacts on public health and whether the action may affect a geographic area with unique characteristics such as proximity to public water supplies.23 This project meets both criteria. The drinking water implications alone, as documented in the EA itself, rise to a level of significance that requires the more rigorous analysis, public involvement, and alternatives development that an EIS would provide.

VI. REQUESTED ACTIONS

For the reasons stated above, I respectfully request that the Forest Service:

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* Deny both the Proposed Action and Alternative A as presented in the April 2026 Draft EA;
* Prepare a full Environmental Impact Statement that rigorously analyzes all alternatives, including a true No Action alternative and alternatives that fully protect the Lake Ouachita and Lake Winona drinking water watersheds;
* Conduct meaningful coordination with the City of Hot Springs, Central Arkansas Water, North Garland County Regional Water District, and the Arkansas Department of Energy and Environment before any further action is taken;
* Ensure that any future analysis fully accounts for cumulative impacts to the Saline River watershed given its current impaired status and ongoing restoration investment; and

Thank you for the opportunity to submit these comments. I respectfully urge the Forest Service to give them full consideration.

Respectfully submitted

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cc:

Ouachita National Forest Supervisor

U.S. Army Corps of Engineers, Lake Ouachita Project Office Central Arkansas Water

City of Hot Springs Water Utilities

Arkansas Department of Energy and Environment

U.S. Fish and Wildlife Service, Arkansas Field Office

FOOTNOTES:

1 U.S. Forest Service, Draft Environmental Assessment - Mining Nominations, Ouachita National Forest (April

2026) [hereinafter "Draft EA"], Affected Environment - Lake Ouachita section, p. 11.

2 Draft EA, p. 11

3 Draft EA, p. 11

4 Draft EA, p. 11

5 Draft EA, p. 11

6 Draft EA, p. 11.

7 Draft EA, Table 3.3, p. 20.

8 Draft EA, p. 11-12.

9 Draft EA, p. 12.

10 Draft EA, Table 3.3, p. 20.

11 Draft EA, Table 3.3, p. 20.

12 Draft EA, Table 3.3, p. 20.

13 Draft EA, Table 3.3, p. 20.

12 Draft EA, Table 3.3, p. 20.

14 Draft EA, p. 11-12.

15 Draft EA, p. 12.

16 Draft EA, p. 12.

17 Draft EA, p. 13.

18 Draft EA, p. 13.

19 Draft EA, p. 25.

20 Draft EA, p. 25.

21 Draft EA, p. 25.

22 16 U.S.C.A. 1536(B)(3)(a).