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Organization: Roca Honda Resources

Title: Manager, New Mexico Operations

Comments: August 31, 2016

Ms. Elaine Kohrman Forest Supervisor Cibola National Forest 2113 Osuna road, N.E.  
Albuquerque, NM 87113

RE: CNF Mountain Ranger Districts Plan Revision, July 2016

Dear Ms. Kohrman:

As a company actively engaged in the permitting and development of a large, high grade uranium deposit located beneath the Cibola National Forest, Roca Honda Resources (RHR) is keenly interested in the Cibola Forest Plan (the Plan) revision process currently underway. We appreciate the outreach efforts that you and the Forest staff have made to solicit meaningful public input into development of the Plan to date and look forward to on-going participation in this important process.

We have reviewed the referenced document and are generally satisfied with the treatment of minerals and geology subject matter as presented on pages 96-102. We would, however, note that while statements indicating that the Forest Service does not have the authority to outright deny locatable mineral activities on valid claims are accurate, they are somewhat misleading. The Forest Service has the ability to impose conditions of approval through the NEPA review process that effectively render a project unfeasible. We believe it is important for the public to understand this and that the Forest Service has considerable discretionary ability and authority under NEPA as well as other environmental protection laws to deny a project that doesn't provide adequate protection of environmental and cultural resources. As you know, Conditions of Approval as part of the Record of Decision for a mining project can run to several pages and impose stringent operating and reclamation requirements.

That said, we support the Desired Conditions for minerals management on the CNF as described on page 98 of the Plan Revision, which we believe are reasonable and appropriate. We further support the Guidelines and Standards as proposed on page 99 of the Plan though we would note that mining-related impacts under an approved Plan of Operations are usually of relatively short duration and can be readily mitigated such that long term impacts to Forest resources and use are minor. In the case of the planned Roca Honda mine, the entire mine would be developed, operated and reclaimed in less than 20 years. During that time period some facilities and operations may not be completely subordinate to the surrounding landscape but they would be short term.

Roca Honda Resources

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We appreciate the opportunity to provide these comments and again commend the CNF's outreach efforts in this

process to date. We look forward to timely completion of the Plan revision process. Please don't hesitate to contact me with any questions.

Sincerely,

Michael R. Neumann  
Manager, New Mexico Operations

cc: Diane Tafoya, USFS Zone Geologist