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Organization:

Title:

Comments: Dear Heidi Roberts and USFS,

I strongly oppose approval of the Roca Honda Uranium Mine, which is proposed on the western slopes of Mt. Taylor and on the border of the Mt. Taylor Traditional Cultural Property (TCP). Please do not allow this egregious proposal to move forward. Countless communities and residents of the Intermountain West region are still paying the price for the last uranium mining boom with their land, air, water, and with their health; some have paid with their lives.

Firstly, as an Indigenous person, this project is slated to take place on sacred land. As a Diné (also federally recognized as "Navajo") citizen and resident of the United States, Mt. Taylor is one of our six sacred mountains called Tsoodzil and is home to Tsoodzil Diyin Diné'é (our Holy People or sacred beings of Tsoodzil). Tsoodzil is also a place with traditional flora and fauna which we consider as cultural resources and use to practice our traditional lifeways. Any disturbance to our sacred places, sacred elements (earth and water), and cultural resources not only impedes our traditional practices, but harms the integrity of designated Traditional Cultural Properties, and non-designated TCPs-such as plants and animals that are also sacred to us.

Additionally, we Diné call the element uranium "leezh litso" (yellow dirt) or "leetso" for short. Our teachings that have been passed down orally from generation to generation since time immemorial tell us to respect leetso, and that we should keep leetso in the ground. If we disrespect our teachings and use leetso in a manner that is not in line with our cultural philosophy of "hozho," which is to walk in beauty and balance with the universe, then we will experience adverse reactions and risk permanent harm to ourselves as humans and to all humanity. Our cultural teachings and traditional practices are not unlike observing a religion; therefore, the disturbance and use of uranium-especially in sacred places-is a direct violation of our First Amendment right. Roca Honda uranium mine and all uranium facilities must be viewed as prohibiting the free exercise and obligation to practice our Diné culture and traditions.

As outlined in the attached Resolution of the Eastern Navajo Agency Council, ENAC-06-2025-028, "OPPOSING ENERGY FUELS RESOURCES' ROCA HONDA URANIUM MINE NEAR TSOODZIL (MT. TAYLOR) TRADITIONAL CULTURAL PROPERTY AND OPPOSES TRANSPORT OF URANIUM THROUGH NAVAJO NATION AND DINÉ COMMUNITIES TO THE WHITE MESA URANIUM MILL ON UTE LANDS IN SOUTHEAST UTAH," Navajo Nation Fundamental Law defines our sacred elements and our sacred mountains, which must be "respected, honored and protected for they, as leaders, are the foundation of the Navajo Nation. The Diné have a sacred obligation and duty to respect, preserve and protect all that was provided for we were designated as the steward of these relatives through our use of the sacred gifts of language and thinking."

The USFS and Cibola National Forest administrators must recognize formal opposition from nearly half of all locally governed Chapters of the Navajo Nation. Attached are two resolutions, ENAC-06-2025-028 and NNAC-233-2025, that clearly oppose Roca Honda uranium mine and uranium transport. The Eastern Navajo Agency Council (representing 31 Navajo Nation Chapters) and the Northern Navajo Agency Council (representing 19 Navajo Nation Chapters) together represent 50 out of 110 total Navajo Nation Chapters. Both agencies would be directly impacted by the mining of uranium and related transport from Roca Honda mine to the Energy Fuels uranium mill in southeast Utah.

For environmental and common sense reasons, we must learn from past uranium mining. It does not matter what type of mining technique is used, whether old methods or new "emerging technologies," uranium mining and every step of the uranium fuel chain create radioactive waste that can move around in our environment. We have

thousands of abandoned uranium mines (AUMs) across the country that still need to be addressed. We have immeasurable amounts of underground water contamination from past uranium milling that require long-term and permanent monitoring with no guarantee that all of it will be cleaned up for future generations to safely consume. We also have other nuclear legacy sites from both energy and weapons production with so many types of radioactive waste without proper storage and disposal facilities. The federal government needs to stop allowing new uranium mining and new uranium wastes to be produced when it still has not cleaned up its own mess created from nuclear defense purposes and the mess it allowed by private and commercial operations.

Furthermore, the USFS should no longer abide by the tenants of the antiquated 1872 Mining Act. This law does not allow for proper due process or denial by states and has robbed our public lands of royalties that could have been used for cleanup and to fund solutions for problems created by uranium mining such as the Radiation Exposure Compensation Act (RECA).

In New Mexico, our arid desert landscape is not water-secure, and becomes even less so as climate change advances. Energy Fuels' Roca Honda conventional mine will pump millions of gallons of water a day that will impact not only the quantity but also the quality of our precious groundwater. Pumping and extraction will mobilize uranium in our water and the environment, as well as other harmful elements that naturally occur with uranium. As Indigenous Peoples have lived with uranium for millennia with no prior history of cancers and other health impacts, we know that uranium left in its natural state and location is not as harmful as uranium that has been altered through mining and processing. To allow new mining after the lived experience of previously downwind and downstream communities is to allow an impending death sentence to newly and repeatedly threatened communities. Indigenous communities that depend on the waters of the Rio San Jose watershed, which Roca Honda would contaminate if allowed, would be sentenced to a slow genocide.

Past uranium contamination and resultant problems are still negatively impacting communities in and near former mine and mill sites, and new mining will only compound those effects. There are many unknowns that must be known before USFS can make any decision regarding new uranium mining. For example, how much ground water is available in the Rio San Jose watershed? What is the rate of rainfall and snowmelt now with the current drought conditions and changes in climate? Unfortunately, there is a huge lack of health and environmental studies to know the true circumstances that we are dealing with. As water testing in our state of New Mexico is extremely slow, soil sampling and community and environmental health studies are even slower or non-existent.

Regarding the proposal activities, the USFS must consider the cumulative impacts of Roca Honda and the neighboring Mt. Taylor Mine, which is still in a process of reclamation, and at least two other mines being proposed nearby (La Jara Mesa and Grant Precision ISR). What is the cumulative amount of water that will be displaced and contaminated if all these projects are approved and operating simultaneously? How long will it take for the aquifers to recharge? Is it enough to allow for x-amount of cumulative water loss from dewatering and contamination? Who will pay for the impacts to groundwater and soil contamination that migrate outside of specific mine project areas? Who is accountable when multiple companies are operating various mining projects that are each permitted by different government agencies?

The USFS cannot rely on self-reporting and other data created by mining companies, but must become proactive at monitoring water and air and to hold companies accountable for excursions and elevated levels of radiation created by mining activities. The USFS must take a comprehensive approach to understand the true background conditions and when measuring impacts from Roca Honda alone, along with the cumulative impacts, especially where proposed In Situ mining may occur and artificially manipulate the natural mechanisms of regional groundwater.

Our US waters must be inventoried and studied before any mining is allowed to alter existing radioactive background levels. Please work across State, Federal and Tribal government agencies to get a baseline of where our regional water quantity and quality are now and please hold uranium companies accountable for any

harm they will cause if mining commences.

This region of New Mexico where Roca Honda and other uranium mines are being proposed is known as the "Grants Mineral Belt" or the "Grants Mining District," and has already been overburdened by too much radioactive contamination from past uranium mining and milling operations. Please do not condemn New Mexico to become a national sacrifice zone...again!

Lastly, the administrative review process of Roca Honda should not be fast-tracked. The public should be allowed ample time to review documents and to respond. As New Mexico is mostly a rural state with a majority people of color population, the public should be allowed enough time for communications in places without adequate cellular and internet accessibility and to have information available in all spoken languages that is easily understood. The public should not be limited on how many pages or documents that may be submitted, especially as USFS and National Forests are public lands. In fact, the USFS should extend the comment period to allow enough time for all members of the public to be educated about the project and to make appropriate comments, as well as for all regional tribal governments to respond, especially those tribes which initiated the Mt. Taylor TCP designation.

Please extend the comment period, study and work to understand and research all unknowns and possible cumulative effects. Do not prohibit the free exercise the cultural, traditional, and spiritual practices of Indigenous citizens and residents. And finally, please reject the proposed Roca Honda uranium mine to safeguard sacred Mount Taylor, our precious water resources, our public health, and the entire Cibola National Forest ecosystem.

Thank You,

Leona Morgan

Diné Resident of New Mexico and United States Citizen