Data Submitted (UTC 11): 9/14/2026 6:58:24 AM
First name: TerryAnn
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Organization:
Title:
Comments: Re: Roca Honda Mine Project 301824 - EIS Scoping Comments

Dear Forest Service:

I oppose the proposed Roca Honda uranium mine and urge selection of the No Action Alternative. The EIS must rigorously evaluate whether this project can protect groundwater, downstream communities, public health and Mount Taylor's cultural and religious integrity throughout construction, operation and closure.

The notice anticipates a project-specific forest-plan amendment excepting the mine from certain desired conditions concerning Tribal, cultural and water resources. Please identify every proposed exception, explain its consequences and evaluate an alternative retaining existing protections. An inconsistency with protective forest-plan provisions should prompt substantive examination of whether the project should proceed.

Require an updated, independently reviewed groundwater model using current baseline data, the revised mine design and realistic drought and recharge scenarios. Publish assumptions, uncertainty ranges, cumulative pumping scenarios and predicted recovery times. Evaluate effects on interconnected aquifers, domestic and Tribal supplies, springs including Horace Springs, and groundwater contributions to rivers. Provide a specific response to earlier EPA concerns and explain whether subsequent modelling resolves them. Distinguish treatment capacity, peak pumping rates, total groundwater withdrawal, consumptive losses and discharge volumes in a reconciled lifetime water balance.

The August 2026 MORP describes a preliminary water-treatment design with some technology choices deferred. Require representative influent characterization, geochemical predictions and demonstrated treatment performance for relevant radionuclides, metals, salts and blasting-related contaminants. Analyse treatment under the full range of expected flows and water chemistry, including start-up, shutdown and abnormal conditions.

Because the proposed discharge enters a non-perennial reach of the Rio San José, assess conditions with no natural background flow. Evaluate pollutant loads, downstream exposure, sediment contamination and remobilization, channel changes, aquatic and riparian habitat, and extreme storms. Specify monitoring frequencies, enforceable discharge limits, automatic isolation of noncompliant effluent, backup power and adequate emergency storage. Explain how a prolonged treatment failure would be managed while groundwater continues entering the mine.

Assess radioactive releases from ventilation shafts, material handling, stockpiles and water-treatment processes, including radon stripped from water. Model combined exposures at nearby homes and culturally important locations using site-specific conditions. Require publicly accessible monitoring results, independently verified performance and enforceable corrective-action thresholds.

Characterize development rock, drill cuttings, treatment sludge and other residuals before approving their management pathways. Evaluate contaminant release when recovering groundwater encounters underground backfill. Identify authorized disposal destinations and capacities, and explain how long-term water-quality protection will be demonstrated.

Resolve the MORP's differing references to sealed trailers and tarping. Evaluate hard, sealable covers, enclosed loading, vehicle decontamination, route-specific exposure and accident risks, and funded emergency response. Assess the project's reasonably foreseeable transport and processing impacts associated with delivery to White

Mesa Mill, explaining the scope of each agency's analysis.

Protect Mount Taylor as a living sacred landscape. Consultation must address religious practice, access, gathering, water, landscape integrity and intergenerational cultural continuity, rather than relying principally on visual mitigation or avoidance of individual archaeological sites. Engage affected Tribal governments early enough to shape alternatives and decisions, protect confidential cultural information, and provide meaningful participation for affected community organizations.

Evaluate cumulative effects alongside historic contamination and other reasonably foreseeable uranium developments. Identify which communities would bear combined burdens and assess practical measures to avoid additional harm.

I acknowledge that the August MORP ties bond release to demonstrated performance rather than elapsed time. Require independently calculated financial assurance covering third-party reclamation, prolonged water treatment, monitoring, waste disposal, contingencies and operator insolvency. Retain sufficient security until protective closure criteria are demonstrably met, including groundwater requirements.

Please expressly address the July 2026 MASE/New Mexico Mining Watch submission and Dr. David Chambers' technical review, identifying which concerns the August revision resolves and which remain outstanding. Make supporting studies and substantive operational plans available with sufficient opportunity for informed public comment before a decision.

The EIS should compare No Action with reasonable alternatives that avoid or substantially reduce dewatering, discharge and cultural harm. Where significant harm cannot reliably be avoided or remedied, that finding should inform selection of No Action.

Thank you for considering my comments.