Data Submitted (UTC 11): 9/16/2026 5:55:23 PM
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Title:
Comments: I am writing to register my strong opposition to the proposed Roca Honda uranium mine on Cibola National Forest land and to ask that the environmental impact statement examine this project with full rigor and without predetermined conclusions.
My opposition rests on these specific concerns, each of which I ask the Forest Service to study thoroughly.
Water. The company's own modeling projects pumping an average of 6.8 million gallons of groundwater per day, with some years reaching approximately 8.5 million gallons per day. This is an extraordinary extraction rate in an arid region. The EIS must assess what this level of pumping would do to existing wells, springs, and aquifers used by communities and wildlife across the region - not just during active mining but for decades afterward. The Rio San Jose cannot be assumed an adequate or safe receiving body for treated mine water without exhaustive independent analysis.
Cumulative contamination. This mine would operate in the Grants Mining District, which the EPA itself has documented as containing 85 old uranium mine sites with recorded production and four former uranium mill sites. Federal investigators are still studying groundwater contamination in the San Mateo Creek Basin from that earlier era of extraction. The EIS must account for what adding new groundwater disruption and radioactive material handling means on top of contamination that has not yet been remediated.
Radon. The Forest Service has already acknowledged that the mine could expose the public to radioactive radon gas vented from mine shafts. The EIS must model realistic exposure scenarios for surrounding communities, not best-case projections supplied by the applicant.
Forest Plan compliance. The project may require amendment of the Cibola National Forest Plan to waive protections for tribal resources, cultural resources, and water. The Forest Service should not treat such amendments as routine accommodations to a mining applicant. If this project cannot meet existing forest plan standards, that is meaningful information about whether the project belongs here at all.
Sacred land. Mount Taylor is sacred to the Navajo Nation, the Hopi Tribe, and the pueblos of Laguna, Acoma, and Zuni. The state of New Mexico has recognized a Mount Taylor Traditional Cultural Property. The EIS must conduct a thorough Section 106 consultation and must not subordinate that process to the permitting timeline.
Corporate identity. Energy Fuels Inc., the project owner, is incorporated in Ontario, Canada. This project is being advanced under federal executive orders promoting domestic mineral independence. The public record should clearly document whether that framing is accurate as applied to this proposal.
I ask the Forest Service to give full and serious study to the No Action alternative. I ask that no forest plan amendments be treated as foregone conclusions. And I ask that the communities most directly affected by this project - including Indigenous communities with ancestral relationships to this land - be given every opportunity for meaningful participation before any decision is made.
This region has not finished paying the price of the last uranium boom. We should not begin the next one without honest accounting of what that cost will be.