

Ms. Heidi McRoberts, Supervisor
Cibola National Forest & National Grasslands
2113 Osuna Road NE
Albuquerque, NM 87113

October 14, 2026

Dear Ms. McRoberts:

Thank you for the opportunity to comment on the National Forest Service's Notice of Intent to prepare an environmental impact statement (EIS) for the plan of operations submitted by Roca Honda Resources, LLC for the development of the proposed Roca Honda Mine Project in the Mount Taylor Ranger District of the Cibola National Forest. The Notice of Intent was published in the Federal Register in September 14, 2026.

Activities proposed in association with the Roca Honda Mine include "approximately 87 acres of disturbance for dewatering wells, vent shafts, dewatering influent pipelines, development drilling, utility corridors, access roads, and associated road improvements...a haul road, two production shafts, a water treatment plant, ore bays, waste rock stockpiles, water retention ponds, diversion channel, and a discharge effluent water pipeline resulting in approximately 279 acres of additional disturbance." A total of 366 acres would be directly impacted by the proposed underground uranium mining operations. Treated mine water would be discharged into a non-perennial segment of Rio San Jose, in the town of Milan.

Clearly, a proposed mining operation of this scope presents numerous environmental and social concerns. Potential impacts cited in the draft EIS for the proposed Roca Honda Mine in 2013 include contamination of surface water, depletion of groundwater resources, air quality impacts from fugitive dusts and diesel emissions, disturbance of vegetation, impacts on wildlife and wildlife habitat, land use changes, loss of recreational opportunities, destruction of cultural, historic, and visual resources, and impacts on health and human safety due to the real or perceived contamination of water, air, and soil. Adverse impacts on tribal communities, the 2013 draft EIS also stated, would likely occur in tribal communities "due to mine development so close to spiritually significant Mt. Taylor."

The current EIS, according to the NOI, will evaluate potential impacts associated with the proposed mine "on National Forest System (NFS) and BLM-administered lands, as well as state and private lands." The NOI states that the applicant must also obtain approvals and authorizations from a number of additional regulatory agencies, including the Bureau of Land Management; the US Army Corps of Engineers; the US Environmental Protection Agency; the New Mexico Energy, Minerals and Natural Resources Department, Mining and Minerals Division; the New Mexico Environment Department's Ground Water Quality, Surface Water Quality, and Air Quality Bureaus; the New Mexico Office of the State Engineer; the New Mexico Department of Transportation; and the New Mexico State Land Office.

Completely absent from this lengthy discussion is the government's statutory obligation to consult with affected pueblos and tribal nations. This is especially true given that the proposed mining operation would be located on the northwest slopes of Mount Taylor (Tsoodzil), one of the four sacred mountains that defines the traditional Diné homelands. As former Navajo Nation Council delegate Daniel Two writes, "Mount Taylor is not an empty mountain waiting to be mined ... It is a living part of our spiritual identity, our ceremonies and our responsibility to future generations."

Nevertheless, the Forest Service has actively advanced the applicant's proposal without engaging in meaningful consultation with affected tribal nations—an action that blatantly disregards the Navajo Nation's 2005 decision to prohibit uranium mining in Navajo Indian Country. According to Tso, the Navajo Nation's prohibition on uranium mining was "not a symbolic declaration" but "an exercise of tribal sovereignty grounded in generations of suffering" associated with uranium mining, including contaminated water, abandoned mines, radioactive waste, illness, premature deaths, and economic devastation.

"Tribal consolation is not a courtesy; it is a governmental responsibility," says Tso. To uphold this foundational obligation, the Forest Service must demonstrate "genuine government-to-government consultation" with the Navajo Nation and other affected pueblos and tribes—before proceeding further with Roca Honda's application. It must fully evaluate the No Action Alternative, disclose its tribal communication record, and respect the Navajo Nation's sovereign determination regarding further uranium mining in Navajo Indian Country.