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Comments: Here are the salient comments re this amendment
Surface Water and Groundwater Quality - The EIS should describe current water quality conditions at all facilities related to the proposed action including Stillwater Mine, Hertzler Ranch and the Benbow Portal, and consider current and cumulative effects related to mine activities and the proposed expansion. The EIS should disclose that discharges of nitrogen from mine waste management facilities resulted in exceedances of applicable groundwater standards not predicted to occur in the previous environmental analyses for the project, and all three mine areas referenced above are currently working under a Compliance Plan associated with their Operating Permit to return groundwater to meet water quality standards.
* Nye Creek Relocation - We are concerned with the impacts associated with relocation of Nye Creek to accommodate planned waste rock facility expansion. This EIS process should consider an alternative design that could allow for this Nye Creek to retain the ability for natural channel formation and migration, recognize natural intermittency representative of Nye Creek's natural geomorphic condition, and stipulate additional monitoring that could support determining feasibility for an alternative design that does not require a fully lined channel that forces perennial flow.
* Require Incorporation of Geomorphic Reclamation Design - This EIS should consider an alternative for both the waste rock and TSF expansions that requires the incorporation of geomorphic landform design concepts into the design analyzed, disclosed and approved as part of this EIS process. for these facilities to improve long-term stability and stormwater management, and would like to see the design criteria expanded to address and minimize visual impacts from the constructed facilities during operation and closure, improve long-term stability, and stormwater management. The recommended design criteria should include objectives to mimic natural topography to minimize visual impacts to the extent possible, and require engagement with a geomorphic reclamation specialist in the development of the final design.