Data Submitted (UTC 11): 7/16/2026 3:56:35 AM
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Comments: Public Comment Regarding the Sibanye-Stillwater Mine Amendment 14 Environmental Impact Statement

To the Custer Gallatin National Forest and the Montana Department of Environmental Quality, Mining Bureau:

I respectfully submit the following comments regarding the Environmental Impact Statement (EIS) for Sibanye-Stillwater Mine's proposed Amendment 14, which would authorize mining operations for an additional 42 years.

This review presents a critical opportunity to ensure that the socioeconomic analysis reflects present-day realities rather than relying on assumptions developed nearly three decades ago. The existing 1998 Mineral Development Impact Plan no longer represents the conditions experienced by surrounding communities and should not serve as the foundation for evaluating impacts through the middle of this century.

The socioeconomic analysis must reject obsolete baseline assumptions from 1998. Those projections relied on local home values of approximately $70,000 and a vastly different economic environment. Since then, property values, inflation, infrastructure costs, and the financial burden placed on local taxpayers have increased dramatically. Continuing to rely on outdated assumptions would substantially underestimate the mine's cumulative impacts on neighboring communities, particularly Park City.

Likewise, the workforce assumptions contained in the original impact plan have proven inaccurate. The plan anticipated a maximum workforce of approximately 700 employees. In reality, the mine's workforce has, at times, exceeded 1,700 employees. This expansion has occurred without proportional mitigation for the resulting demands placed on Park City School District No. 5. Increased enrollment, transportation demands, and long-term pressure on school facilities have accumulated over decades while local taxpayers have absorbed much of the associated cost.

The EIS should also examine the structural inequities within the current property tax system. Pursuant to Montana Code Annotated § 90-6-401, the analysis should evaluate whether the mine's taxable property base is being equitably distributed among impacted local governments. Park City School District has experienced mine-related impacts without receiving a proportional share of the tax base necessary to support school operations, facility improvements, or bonding capacity. The Final EIS should recommend mechanisms that ensure a more equitable distribution of mining-related tax revenues.

In addition, the socioeconomic analysis should evaluate how existing company housing policies and transportation practices influence regional growth patterns. Restrictions on mine-sponsored housing and workforce transportation requirements have shifted housing demand into surrounding communities such as Park City. These secondary impacts deserve thorough evaluation because they directly affect residential development, public infrastructure, and school enrollment.

The analysis must also accurately evaluate both in-migration and out-migration associated with mining operations. Enrollment within Park City School District has demonstrated a clear relationship with fluctuations in mine employment. During periods of workforce expansion, enrollment increases as mining families relocate to the area. During downturns, student populations decline, creating significant financial instability for a small rural district. These impacts should not be dismissed as speculative but instead analyzed using documented historical enrollment and employment data.

The agencies should also recognize the inconsistent standards that have been applied throughout the history of the Mineral Development Impact Program. The original 1998 Impact Plan granted "affected" status to neighboring jurisdictions based largely on projected impacts rather than documented historical evidence. Today, Park City is being required to meet a substantially higher evidentiary threshold despite decades of measurable impacts. This inconsistency should not be used to justify the district's continued exclusion from mitigation programs.

I further request that the agencies review the complete administrative record regarding Park City School District's repeated efforts to obtain mitigation. Specifically, the record should include the audio recordings and transcripts from the September 24, 2021, and November 30, 2023, Mine Impact Board meetings. These proceedings clearly demonstrate that the district's exclusion is not the result of a lack of impact but rather longstanding deficiencies within the existing mitigation framework.

As lead agencies under both the National Environmental Policy Act (NEPA) and the Montana Environmental Policy Act (MEPA), you have a legal obligation to take a thorough, objective, and comprehensive review of cumulative socioeconomic impacts. Approving a 42-year permit extension while relying on outdated socioeconomic assumptions from 1998 would fail to satisfy that obligation and would undermine the integrity of the environmental review process.

Finally, I respectfully request that the Final EIS include a specific recommendation requiring amendment of the Nye Mineral Development Impact Plan. The socioeconomic analysis should conclude that the current plan no longer provides an equitable framework for addressing modern impacts and should recommend formally designating Park City School District No. 5 as an affected local government unit eligible to receive appropriate property tax base sharing and other mitigation measures.

The purpose of this review is not to oppose mining. Mining has long been an important part of our region's economy and will continue to play a vital role in Montana's future. Rather, this process should ensure that the communities supporting this industry are treated fairly and that the cumulative socioeconomic costs of decades of mineral development are accurately recognized and appropriately mitigated before another 42 years of mining activity is authorized.

Thank you for your consideration of these comments and for ensuring that the Environmental Impact Statement fully complies with the requirements of NEPA, MEPA, and Montana's Mineral Development Impact Act.