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Comments: Subject: Public Comment on Stillwater Mine Major Amendment 014 (MA014)

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

I am writing to submit substantive comments regarding the proposed expansion of the Stillwater Mine's tailings and waste rock disposal facilities under Major Amendment 014. While the proposed action promises to extend the mine's life by approximately 40 years through Stage Four and Stage Five expansions, the scale of this proposal-creating a 280-foot (25-story) structure taller than the First Interstate Center in Billings-demands a rigorous evaluation of permanent risks versus temporary economic gains.

Disproportionate Risk and Intergenerational Equity The proposed expansion offers 30 to 40 years of economic activity but leaves behind a permanent environmental liability. It is deeply concerning that the planners benefiting from this expansion today will be retired long before the long-term consequences manifest. We must ask: who is accounting for the impact on our children and the environment 30, 50, or 100 years down the line? The current discourse is saturated with visuals of economic profit, yet there is a stark absence of clear information detailing the long-term risks and the specific mechanisms for remediation when things go wrong. Instead of authorizing new disturbances, priority should be given to cleaning up existing waste rock heaps and ensuring current facilities are secure.

Critical Deficiencies in the Environmental Impact Statement (EIS) To ensure a comprehensive analysis, the EIS must address the following specific concerns:

Surface Water and Groundwater Quality: The EIS must fully disclose current water quality conditions at all related facilities, including the Stillwater Mine, Hertzler Ranch, and the Benbow Portal. It is critical to acknowledge that discharges of nitrogen from mine waste management facilities have already resulted in exceedances of applicable groundwater standards-outcomes not predicted in previous environmental analyses. All three areas are currently operating under Compliance Plans to return groundwater to standards. The EIS must analyze these cumulative effects rather than treating the expansion in isolation.

Nye Creek Relocation: We strongly oppose the proposed relocation of Lower Nye Creek to accommodate the waste rock facility. The EIS must consider alternative designs that allow Nye Creek to retain its natural channel formation, migration capabilities, and intermittent flow characteristics. Forcing perennial flow through a fully lined channel ignores the creek's natural geomorphic condition. Additional monitoring is required to determine the feasibility of designs that do not require such invasive engineering.

Geomorphic Reclamation Design: The approval process must require the incorporation of geomorphic landform design concepts for both the waste rock and Tailings Storage Facility (TSF) expansions. The design criteria should mandate mimicking natural topography to minimize visual impacts, improve long-term stability, and enhance stormwater management. A geomorphic reclamation specialist must be engaged in the final design development to ensure these facilities do not become permanent scars on the landscape.

Systemic Failures: The General Mining Act of 1872 On a broader level, I challenge the State of Montana's failure to advocate for its land and citizens by reforming or challenging the General Mining Act of 1872. This archaic law allows corporations like Sibanye-Stillwater to extract valuable metals from public lands without paying royalties to the true owners-the American public. Until our leaders and protective agencies raise a sufficient alarm, we risk continuing a model where corporations privatize profits while socializing the costs of environmental impact and not compensating the public through royalties.

Conclusion The benefits of a few decades of extraction do not outweigh the costs of permanent environmental degradation. I urge the agencies to demand a more robust evaluation of alternatives, strict adherence to water quality protections, and a reclamation plan that truly mimics nature. We cannot sleepily allow our earth to be compromised for short-term gain.