

Appendix B Table 1 lists substantive comment identified from scoping and comment period responses received on SMC’s plan of operations. Some responses address individual concerns. Other responses address the overall issues or concerns (numbered 1 through 11). Where possible, responses refer to analysis and information in the Decision Memo or project record. In some cases, where a separate specialist report or set of input was not specifically prepared, the agency response constitutes the entirety of the analysis and response.

Table 1. Issues from public comment and agency response.

Issue Identified	Respondent	Comment	Response to comment
1. Effects to dispersed recreation and hunting	Brian Allen	<p>...Wanting to explore during the 2011 fall hunting season is absolutely absurd, if nothing else shows their lack of concern for the general public and its use of "their" land nothing will.</p> <p>SMC knows the impact this will have on recreation, camping and hunting.....</p>	<p>Effects to dispersed recreation and hunting are disclosed in the recreation specialist report (see project record) and include:</p> <ul style="list-style-type: none"> The majority of effects to recreation resources are short term in duration limited to the actual time period of the proposed action. The short-term effects of proposed exploration activities are the loss of use or access to recreation opportunities during some, if not all, of the time project implementation activities occur.....No direct, indirect, or cumulative effects to recreation resources are expected in the long term from the exploration activities. There are no irreversible or irretrievable commitments related to recreation resources from the Proposed Action. The loss of use would impact more recreational users during the summer use season and fall hunting season more than at other times of the year. Project
	Lee Wilder	This is beautiful, pristine recreational land.... do not start down the path of spoiling yet another patch of Montana.	
	Shawn Stewart, Montana Fish, Wildlife and Parks	<p>...the Benbow area is receives a lot of hunting pressure in the fall beginning with archery season. Timing of the project should minimize disturbance to the hunting public. Helicopter support must be tightly regulated after September 1. It would probably be best if the helicopter supported sites were completed prior to that date. If that is not possible consideration needs to be made of restricting helicopter use to specific time periods during the day. An</p>	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment	
		example might be no early morning or late evening flights. Corridors and flight levels would also need to be established.	<p>implementation noise, dust, smoke, and traffic would be heard and observed by dispersed recreation users in the area during project activities.</p> <ul style="list-style-type: none"> • The Action Alternative would not change any MA designations, travel management or motorized use designations, nor would it change any currently prescribed safety standards. • ...temporary displacement of users would be a short-term adverse impact to recreational use opportunities for an estimated one year. In the long-term, such opportunities would not be affected.... <p>No long term changes to National Forest access are proposed are authorized. It is important to point out that there is no public easement or access on portions of Road 2414 that cross privately owned lands to access Trail 51.</p>	
Ben Piersol	Potential effects to bow hunting opportunities for elk.	Randy Kelly Jr		This is a very popular recreation site. That would be my major concern. We don't want to go up there and not be able to enjoy the area they way we have for the past few decades...Drastically changing how we utilize the area for camping hiking and four wheeling.....we would want to be able to enjoy the area as we always have.
Bruce Reierson, Treasure State ATV Association	<p>Access on Benbow Road. Specifically..... how the public would be notified of any short-term road closures or travel delays.</p> <p>Effects to camping around and at the Benbow millsite. The millsite is proposed as a staging area for the exploration, which could potentially preclude camping at some locations in the millsite during exploration....</p>	David Cobb, Western Heritage Realty		<p>Another concern is our access to the Custer National Forest for recreation purposes....</p> <p>The Benbow road gives vehicular access to the Beartooth Wilderness boundary and a popular route for climbers of Granite Peak. Access to the Stillwater and Fishtail</p>

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		plateaus would be severely diminished. Displacement of wildlife will have a negative effect on our hunting opportunities.	
	Martin Tesdal	With mine exploration In that area and helicopter operations I fear the public being excluded.	
	Ralph Saundersmy only concern is with public accessibility on forest service road 2414 to the trailhead, trail 51.	
	Kathleen Howes	... exploration may require “displacing” or restricting areas of the Forest Service Land. In the Buffalo Jump Ranch subdivision we have 2 private accesses into the FS land that my family and I enjoy for hiking. I would find any long term restriction an issue, not only would it mean I’d have to drive somewhere else to hike but it would have the potential to lower my property value, since our land is considered recreational.	
2. Effects to aesthetics (noise, visual resources)	David Cobb, Western Heritage Realty	Additional concerns are for the noise, traffic, helicopter flights overhead and lights at night, since the plans are for drilling 24/7.	Effects to aesthetics are disclosed in the Recreation Specialist Report and Visual Resource Management input (see project record) and include: <ul style="list-style-type: none"> • Direct effects to the visual resource would be caused by felling of trees and soil disturbance proposed in the Plans of
	David Udey do not wish to see any more of our beautiful mountains tarnished with mountains of slag and our peace and quiet interrupted by power equipment, and milling operations.	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		Air & noise pollution, surface scaring, traffic issues, environmental impacts, are a few of the many concerns....	<p>Operations. While all disturbance would be reclaimed (as specified in the Plans of Operation), impacts of tree felling and soil disturbance would be visible in the foreground and mid-ground until revegetation occurs. Dependent upon site characteristics (rock, soil, available moisture), revegetation could take 3 to 10 years. This impact would be negligible and would blend with naturally bare soil and rock throughout the project area. Indirect effects to the visual resource would be very minor and short-term, in that impacts will overall not be visible across the landscape. Disturbance caused by exploration operations would, in the context of the middle-ground, background, and landscape, due to the small and scattered distribution of disturbed areas, be subordinate on the landscape and not be evident to the casual forest visitor and would be consistent with Forest Plan Management Area E visual quality standards and objectives (page 58).</p> <ul style="list-style-type: none"> • Project implementation noise, dust, smoke, and traffic would be heard and observed by dispersed recreation users in the area during project activities.
Kathleen Howes	As far as the noise of the helicopters, I would hope that the in/out flights for the drill operators would occur during non-sleeping hours (perhaps somewhere between 6am and 7pm on the clock). I also hope that the lights are shielded well and that noise mitigation for the drills are used. I live close to the 13.0 and 14.2 drill sites and would prefer to have a minimum of nighttime noise and light....		
Lynn Davis	I....wanted to voice my concerns about light and noise pollution. I am asking that every possible measure be required of the mine that they mitigate the impact on the quality of life of those affected to the extent humanly and technologically possible.		
Sigrid Schramm	The proposal of flying-in all bulky and heavy materials is going to be somewhat of a nuisance for all of us that live downriver from the mine, since the helicopter will be flying over private property....It is, however, more acceptable than trucking materials in.		
Dr. Rob Melchertiming of the exploration proposal is not right as summer months are when he uses his property at Nye.		
David Cobb,	Additional concerns are for the noise,		

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
	Western Heritage Realty	traffic, helicopter flights overhead and lights at night, since the plans are for drilling 24/7.	
	Charles Sangmeister, Stillwater Protective Association	The Councils have been involved in continuing discussions about the location of the helicopter staging area on private land and the flight path of the helicopter as it supports the drill sites. Stillwater Mining Company and the Councils are working to find the optimum location to reduce: noise impacts on residents of the Stillwater Valley, potential spills to surface water sources and large traffic increases on rural roads.	
	Phil McCreedy	...the proposed exploration plan may have significant and long-lasting impacts on water, esthetic, and recreational resources....	
		Several of the proposed drilling sites are within two miles of the Buffalo Jump Subdivision....Views facing south from the residential areas will be directly impacted by the proposed actions, both in the short term, while actual work is progressing, and in the long term, as areas recover from the proposed action. Noise, dust, and visual impairment from helicopter flights and other transportation will be visible at all times of the day and night and will directly impact views, recreational opportunities,	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		<p>and the owners’ ability to use and enjoy their properties. These disturbances have the potential to severely impact the recreational, scenic, wildlife, and other human values that comprise the primary value of adjacent private property. These social, environmental, and resource impacts would not occur in most other similar exploration proposals. As a consequence, an EIS or EA is required to fully evaluate these potential impacts to the human environment.</p> <p>.....Almost all of the drill sites proposed in the Plan of Operations are within a mile or two of residential and vacation properties just north of the forest boundary. In many cases, the affected private landowners acquired their properties specifically for the scenic and recreational opportunities associated with property that abuts the National Forest. These values are at their highest during the spring, summer, and early fall – precisely when the proposed exploration activities are likely to occur. Given the relatively open nature of the north facing slopes on which the drilling is planned - and the fact that operations are planned to occur day and night, seven days a week, throughout the spring, summer, and early fall - there is a high probability that</p>	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		<p>the proposed action will have a significant impact on private landowner views and the scenic resources of the forest. Lights and noise from nighttime operations, including helicopter flights, vehicle traffic, and operational floodlighting at the drill sites should be readily apparent from nearby homes and recreational properties. This impact will occur at precisely the season when nearby residents are seeking to enjoy the quiet and solitude that motivated the acquisition of their properties. While the Forest Plan indicates that the area in question (Management Area E) is to managed to “facilitate and encourage exploration, development, and production of energy and mineral resources . . .” efforts must still be made to “avoid and mitigate resource conflicts” such as the retention of scenic values, recreation and visual quality. Pursuant to the direction in the Forest Plan to The Forest Service should ensure that noise, light pollution, congestion, dust and other impacts to recreation and scenic values are appropriately mitigated before the project is approved.</p>	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
3. Concerns about future mine development.	Brian Allen	So unfortunate that this will take place. SMC will already be driving that way from the Nye site. No point in them blasting, exploring, drilling etc etc from the Benbow side. It doesn't matter which way they portal in or out.	Concerns about future mine development are beyond the scope of this analysis. Because this Plan of Operations is a mineral exploration project, not mine development or production, the discovery of a valuable mineral (warranting the expenditure of time and money) in sufficient grade and continuity to warrant mining is not reasonably foreseeable at this stage of the mineral activity. The intent of SMC’s current Plan of Operations is to gather information to determine if future mineral development is economically and technically feasible. Until this information available, future mining actions are not reasonably foreseeable. NEPA requires that environmental analysis consider “reasonably foreseeable” future actions (40 CFR 1508.7). Reasonably foreseeable future actions are defined at 36 CFR 220.3 as “[T]hose Federal or non-Federal activities not yet undertaken, for which there are existing decisions, funding, or identified proposals.” Development and production of a new mine has not been proposed by SMC or other proponents and is not reasonably foreseeable at this time. In addition, at this early stage of SMC’s exploration activities, it is not reasonably foreseeable to predict: 1) the commercial viability of a given ore body, if any; 2) a proposed ore recovery method; or 3) proposed milling or other
	David Udey	Air & noise pollution, surface scaring, traffic issues, environmental impacts, are a few of the many concerns that I and others who live in this vicinity share.	
	Lee Wilder	This region is a prime recreational facility and I do not understand why we need to permit exploration. I fear that if significant deposits are found, Stillwater Mining will, in fact, work hard to develop the area for mining. There is already one large mine in the country. People are already worried about the mine's use of water and the long term impact on the water table. I am not in favor of ANY exploration in Benbow area, regardless of stated long term plans.	
		I am totally and completely against any exploratory drilling on this forest land. There is no point in "exploratory drilling" unless there is a long term plan for development. Since, I am completely against road construction, permanent facilities or any mining on this pristine property, there is no reason to do any	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
	William and Sigrid Schramm	<p>exploratory activity of any kinds.</p> <p>It is our understanding that according to the Benbow Exploration Portal document, SMC eventually plans on boring a shaft from the Benbow exploration site to the east side of the river opposite the existing facilities. This is not mentioned in the document dated August 20. It appears that SMC is asking for permits "one at a time"! There should be a clear picture of their future intentions, not just the immediate actions to be taken.</p> <p>As far as boring a shaft all the way from the Benbow site to the east side of the Stillwater, we were told at the meeting that all the waste rock (except that of waste rock from the initial portal drilling) would be dumped on the Stillwater River site. Although they have a permit for extending the waste rock pile height, we find this unacceptable. The Benbow area has been a previous mining area, and we feel any waste from future exploration on SMC's part should be deposited there.</p> <p>We have already experienced property value degradation with the height extension of the tailings pond and the waste rock area on the east side of the</p>	<p>operational facilities. Any future proposals to develop mining claims and produce minerals would be mitigated and analyzed as required by Federal mining and environmental law. Such analysis would consider cumulative effects to ensure that development and production are conducted in a legal and environmentally sound manner and that these activities are integrated with the planning and management of other National Forest resources.</p> <p>The issue whether to consider potential future mining as reasonably foreseeable was decided in <i>Cabinet Mountains Wilderness v Peterson</i>, 510 F. Supp. 1186 (4th Cir. 1981), which states: “<i>The Federal action to be decided through the Environmental Assessment is whether to approve the Plan of Operations for mineral exploration, and if so, under what terms and conditions. There has been no approval of any mining program that might ultimately be presented. If and when there is a proposal for mining, further environmental studies will be required.</i>”</p>

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		<p>river. Perhaps some other options should be explored.</p>	
	<p>David Udey</p>	<p>The proposal you provided me indicates they do indeed plan to drill for mineral exploration. Which, provided SMC determines mineral enough to further thier interests, would mean surface structures could be assembled and before we know it, we would have a full-blown mining operation underway up Benbow road.</p> <p>None of this has been layed out. I would like SMC to provide an expectation proposal which would indicate that if minerals worth mining are found, what sort of surface operation would be inplemented and then ask the public to comment on this proposal. I can not believe that SMC has not looked this far ahead, and thus, I feel this information should be shared with those of use who have concerns.</p> <p>Air & noise pollution, surface scaring, traffic issues, environmental impacts, are a few of the many concerns that I and others who live in this vicinity share. I believe that SMC has good intentions of minimizing the effects of thier presence on those who live here. However, they are not being very forthcoming with thier intentions, over the</p>	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		<p>next year, two years, five years, etc...It seems the information being put forth amounts to puzzle pieces. And one day these puzzle pieces may be completely assembled, and before we know it, Benbow will have fully functional mining facility similar to the one located up the Boulder Valley.</p>	
		<p>What is not disclosed within this plan, is what happens and what Stillwater Mining Co. intends to do if they find just cause to implement operations from these exploratory findings.</p> <p>The plan of operation that was offered for comment last fall, provided specifics regarding hole depth and proximities to one another, which suggested the exploratory work was being done not to locate minerals, but to determine quality of foundation material for building placement. If this be the case, then I think it imperative that SMC be forthcoming with long term plans relating to the discovery of minerals. Do they plan to institute a surface operation facility such as the one at either the Nye or East Boulder site.</p>	
	Steve & Donna Mattson	<p>I do want to point out an issue that may be a problem when they start the development of the decline ramp. My concern will be noise especially from the ventilation fan that will</p>	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		<p>be a must. They will need to install a large electric ventilation fan outside the portal area. I would like all precautions installed to silence this fan as one of the beautys of this area is the silence and a fan not properly installed and silenced will create a noise heard throughout the area for quite a distance. I know that a fan with proper silencers and installed in a well constructed accoustically designed building can be used and not heard. Please keep this as a priority as this entire proposal gets closer to the start of the Decline ramp.</p>	
	<p>Stillwater County Commissioners</p>	<p>This initial stage in the process of expanding mining operations is significantly important to the further development at Stillwater Mining Company. Operational expansions will drive positive economic impacts in the future for Stillwater County.</p>	
	<p>Dr. Rob Melcher</p>	<p>.....drilling is only a start and things will get worse and worse as it progresses and if Stillwater Mining Company finds the ore deposit.</p>	
	<p>Bruce Reieron, Treasure State ATV Association</p>	<p>Long-term mining development in the area could also affect camping opportunities.</p>	
	<p>Randy Kelly Jr</p>	<p>.... potential for job creation if useful minerals and ores are unearthed, that would</p>	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		be a great benefit in its own way.	
	Kurt Voight	Effects of exploration and potential long-term mine development in the Benbow area. Concerns include maintaining public access on the Benbow Road and maintaining access to National Forest adjacent to the Buffalo Jump subdivision.	
	Linda Wham	Benbow Mine has already decimated the environment and if drilling proves successful a full scale mining operation would result.	
	Bob Kirch	Mining and resultant effects to springs in the area should they be intercepted by underground mine workings. Mr. Kirch mentioned that there are several springs in the area that Stillwater Mining Company may not know about, but may be interested in monitoring.	
	Kathleen Howes	As far as long term mining plans, which were not discussed but can be inferred from my reasonable perspective, I would be very distressed if the forest service access behind the Buffalo Jump subdivision were closed off or limited. We purchased our land in Buffalo Jump Ranch (and paid a premium for it) because of the recreational value of the Forest Service land directly behind us. Closure would affect our investment. In addition any further road construction, in the plan area, to potential portals would	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
	David Cobb, Western Heritage Realty	<p>seem to encourage some ATVers to stray further from the designated trails/roads.....</p> <p>Restricting access in the likely event that Stillwater Mining Corp. will conduct full scale mining operations in the future will negatively impact our property values. A majority of buyers that purchase lots and homes in Buffalo Jump Ranch do so because of the recreational activities available in the adjacent National Forest. Many residents, including myself, hunt in Custer National Forest above our subdivision.</p>	
4. Reclamation effectiveness.	Kevin Colussi	I have serious concern about the health the public lands you help manage after this exploration.	<p>SMC is legally required to complete reclamation as detailed in the Plan of Operations and as required by State and Federal law, regulation, and policy, including 36 CFR 228a and the Montana Metal Mine Reclamation Act. The Plan of Operations includes specifications to reclaim the access route to the Portal drill site.</p> <p>Per 36 CFR 228.7, the Forest Service conducts administrative site visits during exploration drilling, project reclamation, and post-reclamation. Monitoring of proposed exploration activities by certified Forest Service locatable minerals administrators and MDEQ small mining program personnel is conducted to ensure</p>
David Udey surface scaring.....(and) environmental impacts, are a few of the many concerns that I and others who live in this vicinity share.		
Charles Sangmeister, Stillwater Protective Association	The Plan of Operations describes the use of old ATV/logging roads to access the Portal drill site. It is recommended that appropriate reclamation measures be taken on the access road after drilling activities		

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		are completed to prevent future use of the road by recreationalists. Reclamation measures could include replacing deadfall over the trail, placing boulders at the entrance to the access road, and re-grading, scarifying and reseeding as necessary.	compliance with the Plan of Operations and applicable Federal and State law and regulation. Examples of the type, frequency, and outcome of prior monitoring of similar past operations are on file at the Beartooth Ranger District and MDEQ’s small mining program office in Helena, MT.
	Martin Tesdal	The reclamation of areas such as the Benbow has not always been accomplished by the mines and the Forest Service has been lax in enforcing it. A good example is the Benbow Itself.	
5. Effects to wildlife and aquatic species, including Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed	Sigrid Schramm	Also, the bighorn sheep population is being driven from the area. We have observed that most of them no longer winter in the area (because of the waste rock pile) but head on to private property. With additional activities in the Benbow area, they, as well as the elk, will be disturbed, which could push them out of the area entirely.	Potentially affected species and their habitats were analyzed and effects are disclosed as summarized in the Decision Memo. Additional information is available in the Biological Assessment, Biological Evaluation, and fisheries input.
	Shawn Stewart, Montana Fish, Wildlife and Parks	...make sure that all season restrictions and other stipulations (helicopter corridors and flight levels) that have been enforced in the past in the upper Stillwater are consistently applied to this project.	
	Martin Reed	I do not wish to hear or see any helicopters or other equipment flying around in one of the last pristine areas which are home to elk, moose and other wildlife which come	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
critical habitat, or Forest Service sensitive species.		down from this area to winter near my home.	
	Josh Kochin	Impacts of additional human activity to wildlife. Montana’s unique wildlife values are irreplaceable.	
	Phil McReedy	Streams that are proposed to be used for water drafting and/or will receive potential runoff from drilling activities run directly into the Subdivision and are used for irrigation, subsurface recharge, and the propagation of fish and wildlife.....	
	Gretchen Marlin	...The noise pollution these helicopters will create will likely disturb the wildlife which currently reside in the area; negatively impacting the success of resident hunters on their properties, disrupting breeding of native mammals and birds, as well as adding the persistent din of jet engines to an otherwise pristinely natural and tranquil area.	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
6. Effects to air quality	David Udey	<p>Air....pollution(and).... environmental impacts are a few of the many concerns that I and others who live in this vicinity share.</p>	<p>Effects to air quality specific to this project are disclosed in the Recreation Specialist report (see project record) and are as follows:</p> <ul style="list-style-type: none"> • Project implementation noise, dust, smoke, and traffic would be heard and observed by dispersed recreation users in the area during project activities. <p>In addition, based on ongoing monitoring of particulate matter (PM 10 or PM25) at SMC’s Nye Mine, no Air Quality Act violations have been previously noted at the mine site or in the Stillwater Valley. Given the smaller scope of this mineral exploration project when compared to the active mining operation, it is highly unlikely that any air quality standards will be exceeded by a short term mineral exploration project involving small drill rigs, helicopters, and motorized vehicles.</p> <p>To ensure compliance with applicable law, SMC’s Plan of Operations specifies that “All engines utilized in the operation will be equipped with catalytic converters, mufflers, and spark arrestors with which they were manufactured. To the extent possible, Stillwater will attempt to secure Tier II and Tier III Engines for all equipment.” Implementation of similar projects over the past twenty to thirty years has resulted in no adverse effects to the Class II airshed in the Absaroka-Beartooth Wilderness Area. Similar effects are anticipated for SMC’s Plan of Operations.</p>

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
7. Effects of exploration traffic to existing roads.	Scot Schermerhorn	<p>The primary concern I have with the above project is the increased traffic, heavy equipment, and the resulting effect on the primary roadways.</p> <p>The road from Dean to the Benbow Mill Site is not constructed or maintained for commercial or heavy vehicle use. And, there is nothing within the summary of Plan of Operations that addresses the construction or maintenance of roadways. I, therefore, object to the proposed project until adequate provisions are made to gravel where appropriate and grade when appropriate the existing roadways from Dean, Montana, to the end point of the exploratory drilling.</p>	<p>SMC proposes ten vehicle trips per day on Benbow Road. Impacts of this traffic would be difficult to discern from existing traffic use on Benbow Road. For the level of mineral activities proposed, additional road maintenance activities are not proposed nor would they be deemed necessary. Proposed exploration traffic on roads within the drilling area would have the direct effect of increasing overall traffic during project implementation. This could potentially create congestion on narrow stretches of Benbow Road, requiring users to travel slower or recreate elsewhere.</p> <p>Road maintenance of the Forest Service portion of Benbow road was completed in fall 2011 and has improved road drainage features so as to address potential water quality concerns associated with ongoing road use. Road maintenance activities proposed in SMC’s Plan of Operations include snow plowing and construction and reclamation of one drill site (site 23,0) immediately adjacent to Benbow Road. Based on review of the road system at site 23,0, SMC will be required to ensure that the culvert and ditch system at the site are functional both during and after operations at this site.</p>
8. Effects to	Josh Kochin	Impacts to groundwater of exploratory	While noise would likely be heard at nearby

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
residential property values		drilling and resultant effects to domestic water wells. This would likely devalue properties.	residences (see response to issue #2), it is not possible to accurately calculate the effects of short-term noise to residential property values. Short-term mineral exploration activities (i.e. one year) are not expected to affect residential property values due to the short duration and location of activities at a distance from residences. No effects to residential water sources or water rights and related property values are anticipated (see responses to issues #9 and #11). Review and documentation specific to extraordinary circumstances is disclosed in the Decision Memo. Proximity of the proposed exploration to residential and vacation properties does not constitute an extraordinary circumstance per 36 CFR 220.6.
	Janet Mummery, Jan Mummery	My sister and I are trying to sell our property on the pristine, Stillwater River. It would not be possible if you were to do this along the river.	
	David Cobb, Western Heritage Realty	Mining activity and closure of the Forest to the public will certainly have significant negative impact on all resident's property values. As a real estate broker I have already begun disclosure of the new mining exploration and possible future mining above Buffalo Jump Ranch. Montana law requires disclosure of all adverse material facts. My pool of potential buyers will be severely reduced as the uncertainty of what the future holds will eliminate a considerable number of potential buyers.	
	Floyd Schmitz	mining requires a lot of water so that brings up the issue of our wells. Should they dry up it would effect our property values.	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
	Kurt Voight	<p>..... I will have to disclose the potential for further development of mineral extraction on the forest immediately bordering the subdivision to all future customers which could have a negative impact on their decisions to buy and/or build here and consequently effect the long range property values. The private access to the forest for hunting and general recreation the residents share with our 2 deeded access right of ways is also an important factor in the value of the lots here and any restriction to this access would be another impact that could effect property values in a negative way.</p>	
	Phil McReedy	<p>.....the proximity of the proposed exploration to high value residential and vacation properties constitutes an extraordinary circumstance that warrants more detailed environmental review and/or mitigation measures.</p>	
		<p>.....In particular, unlike many proposed mineral exploration and extraction proposals, which occur in wilderness areas or far from human development, the Proposed Action would authorize significant mineral exploration activities a mere mile or two from the Buffalo Jump Ranch Subdivision, as well as other ranches, residences and vacation homes...</p>	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
	Martin Reed	My property value will decline further if this is allowed to happen on PUBLIC not private land.	
9. Effects to groundwater quality and quantity.	Eric Anderson	...To me it seems along ways off to have any impact on our water.	<p>Effects to groundwater quality and quantity are disclosed in the hydrogeology specialist report and include:</p> <ul style="list-style-type: none"> • Montana has water quality standards that support and protect the beneficial uses of state waters. Each body of surface water is classified according to its beneficial uses. The Stillwater River is classified as B-1, suitable for multiple uses including domestic water supply after conventional treatment and cold water fisheries that support trout and associated fish. Section 303(d) of the federal Clean Water Act (CWA) requires states to assess the condition of state waters to determine where water quality is impaired (does not fully support uses identified in the stream classification or does not meet all water quality standards) or threatened (is likely to become impaired in the near future). The result of this review is the compilation of a 303(d) list, which states must submit to the EPA biannually. Section 303(d) also requires states to
	Josh Kochin	Impacts to groundwater of exploratory drilling and resultant effects to domestic water wells....	
	David Cobb, Western Heritage Realty	<p>The possible impact to our [Buffalo Jump Ranch subdivision] water supply is a serious concern with the mine using water that supplies many of our resident's wells, stock water and a pond in the neighborhood. I would think it would be appropriate for the Mine and the Buffalo Jump Ranch residents to discuss possible remediation plans in the event our wells and surface water is affected.</p> <p>Water is my primary concern as Lots 57,58,60,51,45,21,18,16, 14 have existing wells and are all located along Burnt Creek. Lots 46,33 and 17 do not have wells yet, but</p>	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		also are located on Burnt Creek. In addition, Lot 30 has a pond that is fed by Burnt Creek and is a water source for fire protection for our subdivision. Less water in Burnt Creek will directly impact 13 property owners in Buffalo Jump Ranch. Degradation of water volume and quality directly affect property values.	<p>prioritize and target water bodies on their list for development of water quality improvement strategies (i.e., Total Maximum Daily Loads or TMDLs), and to develop such strategies for impaired and threatened waters. A waste load allocation is the part of a TMDL/water quality restoration plan that assigns specific reductions to meet identified water quality targets. The load may be divided by land use (rangeland, cropland), or activity (construction, timber harvest, mining) or assigned to subwatersheds or tributaries.</p> <ul style="list-style-type: none"> • The reach of the Stillwater River from the Forest Service boundary to Columbus (MT43C001_020) is listed in 2010 as
	Floyd Schmitz	...mining requires a lot of water so that brings up the issue of our wells. Should they dry up it would effect our property values.	
	Lynn DavisI am concerned about the amount and quality of my water. The mine has contaminated wells in the valley and stripped water supply in certain cases, and they can be more careful.	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
	Katie Howes	One of my most pressing concerns for the exploration phase of this project are the waste from the drill holes...looking at DEQ Clean Water Act Information < http://cwaic.mt.gov/results.aspx?qryld+90808 > and they indicate that the Stillwater River has a fair rating for drinking and recreational prospects due mercury, copper and nitrate/nitrites because of historic mining. That mining was done in the same sort of non permeable rock and it has still degraded the watershed for many years now. So I find it frustrating that the revised proposal seems to say don't worry about it any residues will wind up entrapped in the non-permeable rock.	fully supporting agricultural, industrial, and primary contact recreation uses; partially supporting aquatic life and cold water fishery uses; and not supporting drinking water use. The list states the probable causes of impairment are cadmium, copper chromium cyanide, nickel, and nitrate/nitrite. The list identifies the probable sources of impairment as impacts from abandoned mine lands (cadmium, copper, chromium, mercury, and nickel); unknown source (cyanide); natural sources, watershed runoff following wildland fire, and permitted hardrock mining discharges (nitrate/nitrite). TMDLs have not been completed for this reach of the Stillwater River (DEQ 2012). No probable causes or sources of impairment are linked to past exploratory drilling.
10. Economic effects.	Keith and Kathryn Martin	We favor the blitz ridge – 2012 Surface exploration drilling plan of operation for mineral exploration. In this economy, we need the extra industry and additional jobs.	This mineral exploration will create short-term jobs in the area with some secondary benefits due to purchasing of various supplies and services in support of exploration work. While much of the local and regional economy is reliant upon jobs and economic effects associated with the mining industry (MTDLI 2012), it is not anticipated that this short-term exploration project would have any significant effects to the local, regional, or
David Cobb, Western Heritage Realty	Benbow road closure would impact local businesses from decreased tourism.		
Laura Skaer, Northwest	Stillwater Mining Company (SMC) is the kind of company Montana needs. They		

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
	Mining Association	<p>have a proven record of safety, sustainability, and generosity. The Stillwater Mine has been producing platinum group metals since 1986. In order to continue producing well into the future, additional areas of the mineral deposit need to be accessed. The Blitz Ridge exploration drilling project will contribute to the long-term sustainability of the Stillwater Mine and provides an opportunity to extend the presence of SMC in Montana to the benefit of the entire state.....</p> <p>.....The Blitz project represents an excellent opportunity to maintain the 940 current jobs at the Stillwater Mine, and generate tax revenue, jumpstart economic growth and help the U.S. become more self-reliant for our critical minerals needs.....</p> <p>.....Increased import dependency causes a multitude of negative consequences, including aggravation of the U.S. balance of payments, unpredictable price fluctuations, loss of high paying jobs and vulnerability to possible supply disruptions. Approval of the Blitz Ridge exploration project and resulting expansion of the Stillwater Mine will help ensure a domestic supply of platinum group metals for years to come.</p>	<p>State economy.</p> <p>Because no mining project has been proposed (see response to issue #3), it is not possible to accurately analyze or predict economic effects of future mining.</p> <p>No road closures or changes to travel management are proposed. No precise data exists relative to the economic effects of recreational use in the area, either by citizens or commercial outfitters, therefore it is not possible to accurately disclose the economic impacts that could potentially result from short-term displacement of such users.</p>

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
	Martin Tesdal	There Is a private business of renting atvs to the public In close proximity. His business would be damaged severely with any exclusion.	
11. Effects to surface water quality and quantity.	Bob Kirch	Water withdrawal in Little Rocky Creek for exploratory drilling and resultant effects to surface water rights, including the Kirch family’s Little Rocky Creek water right.	<p>Effects to surface water quality and quantity are disclosed in the hydrogeology specialist report and include:</p> <ul style="list-style-type: none"> • The risk of delivery of water or sediment from the drill sites to any surface streams or ground water is very low assuming the drilling program is implemented as proposed..... It is expected that because the volume of drilling fluids and fuels used at each drilling site is very small and any spillage would be contained and immediately cleaned up, the risk of direct effects from sediment contamination of surface water is very low. •based on MSDS from drill additives commonly used in past similar exploratory drilling projects, the substances most likely utilized would have no potential to bioaccumulate and are not toxic to fish, microorganisms, and humans. Based on available information, the quality of surface water sources would not be directly or indirectly affected by exploration activities.
Kathleen Howes	My immediate concerns for the exploration phase of this project are the waste from the drill holes. It would seem to me that with all the care that will be taken to minimize the risk of spills at the drill site and prevent erosion that more care should be observed with the drill extraction waste sumps. The “fine sand” you mentioned will surely be mixed with some oils and other drilling lubricants. Shouldn’t the sumps be lined and this waste taken out? You said that the sand would be left behind in the sumps, and the water draining off. These sands will leach whatever remnants of the drilling fluids, plus the naturally occurring heavy metals of the stone, for years. I feel more consideration should be made to contain these toxins from entering the water system (both surface and ground), by removing them from the drill site.....on page 20 (under Hazardous Substances, section 3,		

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		<p>part C) of the “Plan” it indicates that spills of less than 25 gallons would not need to be reported, if they don’t enter the surface water system, but my thinking is any spill leads down from these mountains into our waters (surface and ground) regardless of quantity.</p>	<ul style="list-style-type: none"> As of June 2012, surface water has been over-allocated for Little Rocky Creek and Prairie Creek. These sources are unavailable for SMC’s use unless an existing water right can be leased or acquired. For drill locations 13.0, 14.2, and 18.2, SMC has applied for water rights on Burnt Creek. At this time, Burnt Creek water use is under-allocated. State of Montana water rights statute requires MT DNRC to evaluate whether water is legally and physically available, and whether there would be an adverse effect caused by granting the water right. By virtue of approval, if MT DNRC grants water SMC rights to use up to 25 gpm of surface water, no water quantity concerns would exist for downgradient beneficial uses, including preexisting domestic and aquatic life uses. The risk of affecting water quality, water quantity or physical stream characteristics from surface water diversions would be low. No significant ground-disturbing activities are proposed in floodplains or wetlands within the project area. No municipal watersheds exist immediately downstream from the proposed activities within the Stillwater River drainage. Therefore, no significant adverse impacts are anticipated for
Lynn Davis	<p>.....I am concerned about the amount and quality of my water. The mine has contaminated wells in the valley and stripped water supply in certain cases, and they can be more careful.</p>		
Charles Sangmeister, Stillwater Protective Association	<p>It is stated in the Plan of Operations that all excess clarified water that cannot be contained in the cascading sumps will be discharged to surface. It is recommended that the excess water be collected and discharged in the tailings impoundment if the excess water should have a visible oil sheen, be visibly un-clarified (contain a significant amount of suspended sediments), or be known to have been contaminated from an accidental spill.</p> <p>.... It is recommended that planning efforts be made to ensure that the two drill rigs operating concurrently are on sites that do not source water from the same location. Some of these creeks do not have significant flows and many citizens</p>		

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		<p>downstream depend on the limited water available from these sources.</p>	<p>floodplains, wetlands, or municipal watersheds. The risk of affecting water quality, water quantity or the physical stream at water drafting sites would be low and the risk of indirectly affecting water quality, water quantity or physical characteristics of area streams or their tributaries would be very low.</p>
	<p>Gretchen Marlin</p>	<p>The primary issue with which I am concerned is the ongoing health and integrity of the springs and surface water which will be utilized in the drilling process.....</p> <p>I have enclosed with this letter the most recent Stillwater River environmental report published by the Clean Water Information Center. As evidenced by this report, the impacts from previous mining operation is seldom untraceable, and frequently leaves behind a lasting (negative) legacy for decades to come.</p>	
	<p>Kurt Voight</p>	<p>.....myself and a number of others in this residential subdivision have shallow and marginal wells in close proximity to the creek. A change in the existing weak flow could reduce or eliminate our water supplies. There are 9 lots bordering the creek that have existing wells these being lots 57,58,60,51,46,21,18,16, and 14. Lots 45,33,17,and 30 also have frontage and would be drilling next to the creek when they are built on. Lot thirty has a large pond that is part of the creek and serves as the only water source for fire suppression. There are also some smaller ponds and</p>	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		catch basins which are used to water livestock.	
	Phil McReedy	Several of the proposed drilling sites are within two miles of the Buffalo Jump Subdivision. Streams that are proposed to be used for water drafting and/or will receive potential runoff from drilling activities run directly into the Subdivision and are used for irrigation, subsurface recharge, and the propagation of fish and wildlife.	
		The Proposed Action’s Potential Impacts on Water Resources have not been Adequately Addressed. The Proposed action contemplates significant withdrawal, use, and potential discharge of contaminated water. The Proposed Plan contemplates withdrawal of at least 30 gpm from Burnt Creek and Rocky Creek. These sources, as well as other intermittent streams in the area border on or run directly through the Buffalo Jump subdivision or other residential areas and supply. According to Montana Department of Natural Resources and Conservation (“DNRC”) records, these sources are used by Subdivision residents for irrigation, stock water, and maintenance of ponds for fish and wildlife. Although water and chemicals injected into wells at the project location may not migrate	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		<p>underground to nearby household wells, surface runoff from discharged project water could find its way to local residents – either directly through surface water flows or indirectly through recharge of groundwater from those surface water flows. This issue is especially important because neither the Proposed Plan nor the Forest Service evaluation identifies the types of chemicals that could be used in the drilling process. And, although the plan calls for capture of drill wastes and flows flushed from drilling operation to be “contained in portable tanks” – it also clearly recognizes that drill cuttings and sludge would be discharged into cutting sumps that would allow the potential for direct escape of these materials into the watershed. There is no provision for ensuring that drilling sludges or excess water could not find their way into one of the many surface streams that lead directly to private property – especially if there is a weather event that exceeds the planned capacity of the proposed cutting sumps. This proposed water use and potential discharge of drill cuttings and contaminated waste water has the potential to significantly impact the watershed as well as property owners and water rights holders</p>	

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		<p>down gradient from the location of the proposed action. These potential impacts to the watershed have not been adequately considered and conflict with both the Forest Service Organic Act and the Custer National Forest Management Plan (“Forest Plan”), which requires soil and water to be “managed to maintain or improve quality of watershed, including soil productivity and water quality ... to meet or exceed state water quality standards” and to ensure that “all freshwater aquifers will be protected from contamination by such things as oil and gas drilling and brine water injections.” Forest Plan at p. 25.</p>	
Other Comments	Kevin Colussi	<p>Remember to uphold our states constitution which states: Constitution of Montana -- Article IX -- ENVIRONMENT AND NATURAL RESOURCES Section 1. Protection and improvement. (1) The state and each person shall maintain and improve a clean and healthful environment in Montana for present and future generations.</p>	<p>Mineral exploration is an activity authorized by State of Montana law (Annotated Rules of Montana 17.24.101 to 17.24.189). State law is considered to be in compliance with Constitution of Montana, as determined by the State legislature and governor approving such law.</p>
	Scott Froelich	<p>..... I would like to see one stipulation. I would like to see the trail/road that begins at highway 419 at the Stillwater Mine property and proceeds up the Nye Creek drainage to the top of the mountain, opened up to Off Highway Vehicles. This trail/road connects</p>	<p>This road crosses private property. Access across private property can only be granted by the property owner. Permission to cross private lands is beyond the authority of the Forest Service.</p>

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		to forest service trail 2414. This trail/road is currently signed "Authorized Personnel Only". Opening this trail/road would complement the already excellent trail system at Ben Bow.	
	Sherry Simmons	Stillwater Mining company continues to have numerous and blatant violations in health, safety, regulations for clean mining...the list is endless. The company has shown repeated disregard for environmental concerns. I wouldn't want ANY company mining in the Beartooths, but I especially don't think Stillwater has earned any further consideration. In fact, I believe they should be shut down until they are in total compliance with regulations.	Legal compliance and administration of SMC’s ongoing mining operations is beyond the scope of the mineral exploration proposal being considered for this analysis. For this exploration project, per 36 CFR 228.7, the Forest Service will conduct administrative site visits during exploration drilling, project reclamation, and post-reclamation. Monitoring of proposed exploration activities by certified Forest Service locatable minerals administrators and MDEQ small mining program personnel is conducted to ensure compliance with the Plan of Operations and applicable Federal and State law and regulation. Examples of the type, frequency, and outcome of prior monitoring of similar past operations are on file at the Beartooth Ranger District and MDEQ’s small mining program office in Helena, MT.
	Kurt Voight availability of water for firefighting purposes.	Numerous sources of water are available for firefighting purposes, including the ability to transport water from other water sources via tanker trucks, helicopters, etc. Potential effects to surface and groundwater sources are disclosed in the hydrology input specific to this mineral exploration project (see response to issue #11 and

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
	Doug Parker	EA level NEPA is entirely appropriate for this type of activity with minimal footprint and potential impacts.	report in project record). Per Federal Regulation (36 CFR 220), the appropriate type of NEPA analysis and decision has been determined to be a decision categorically excluded from additional documentation in an environmental assessment or environmental impact statement. This determination by the Deciding Official is based on review of environmental analysis and potential effects as documented in the Decision Memo.
	Charles Sangmeister, Stillwater Protective Association	...It is recommended that information about the helicopter flight paths and the location of the helipad on private land be made available to the public, specifically citizens living in the vicinity of the mine site, the Benbow Road and the mine’s Hertzler Ranch facilities.	Approved activities, including helipad locations and flight routes, are disclosed in the Decision Memo and Plan of Operations, which are publicly available documents per 36 CFR 228.6.
	Charles Sangmeister, Stillwater Protective Association	It is recommended that the composition of the drilling fluids used on the drill sites be released for public input prior to commencement of drilling activities.	As stated in the Plan of Operations (page 18), “Copies of MSDS for substances used on National Forest Lands will be maintained at each drill site. In addition, a copy of each MSDS will be provided to the Forest Service Representative prior to commencement of activities. Potentially hazardous materials will be handled, managed, and disposed of as described in the Materials Safety Data Sheets and removed from National Forest Lands at the completion of activities.”

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
			<p>Submitted MSDS sheets for drilling fluids related to this Plan of Operations are publicly available documents per 36 CFR 228.6. Pursuant to 36 CFR 228 4(e), in the event that submitted MSDS sheets indicate potential for unforeseen significant disturbance to surface resources, the authorized officer may ask the operator to furnish a proposed modification to the plan, which could include modifying the drilling fluids utilized.</p>
	Gretchen Marlin	<p>This is also paleontologic rich area, with numerous fossilized remains discovered and documented in the recent decades. I hate to imagine the discoveries which may be forever destroyed by disruption of the land by the proposed drilling.</p>	<p>Based on geologic mapping of the area (Lopez 2001), the majority of drill locations in this plan of operations are located on Pre-cambrian rock units which pre-date occurrence of significant fossil remains. The “Portal” drillsite is located on soils which are derived from the Jurassic Ellis group. Exploratory drilling will occur in the Ellis group and underlying older sedimentary rock units. Several of these rock units are known to contain various invertebrate marine fossils. A condition of approval specific to protection of fossil resources under Forest Service jurisdiction was added as a condition of approval (see Decision Memo).</p>
	Martin Tesdal	<p>Table 1, item 1 of the analysis results states an interruption of recreational activities is anticipated. I would suggest a notification to the public, via local Television and newspapers, by SMC and/or USFS at least a week ahead of a planned interruption which would restrict or delay public access.</p>	<p>SMC is responsible per 36 CFR 228.9 to identify potential hazards to the public. A condition of approval specific to public notification by the Forest Service was also added as a condition of approval (see Decision Memo).</p>

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
	Kathleen Howes	<p>As quoted in the March 27th Billings Gazette article regarding the Forest Service’s new planning rule: “The new rule also requires national forests to protect watersheds and water supplies on national forests; balance multiple uses including recreation, timber-cutting, wildlife management and range use; get more people involved in outdoor recreation; and document the use of "best available science" in decision making”.</p> <p>In addition your mission stated on the USFS website is: The mission of the USDA Forest Service is to sustain the health, diversity, and productivity of the Nation’s forests and grasslands to meet the needs of present and future generations. I think that looking forward to the future health of the land is one of your primary tasks.</p>	<p>Forest planning (i.e. future revision of the Forest Plan) and the planning rule are beyond the scope of this project. The Custer National Forest is managed in compliance with the existing Forest Plan as amended and multiple other laws, regulations, and policies. Approval of this plan of operations will comply with these various requirements as stated in the Decision Memo, including the 1970 Minerals Policy Act, which states that “The Congress declares that it is the continuing policy of the Federal Government in the national interest to foster and encourage private enterprise in (1) the development of economically sound and stable domestic mining, minerals, metal and mineral reclamation industries, (2) the orderly and economic development of domestic mineral resources, reserves, and reclamation of metals and minerals to help assure satisfaction of industrial, security and environmental needs....”</p>
	Phil McReedy	<p>The Forest Service’s proposed authorization of the Plan of Operations does not adequately analyze the risk of fire or provide appropriate conditions to ensure proper management. Much of the work being proposed in the Plan of Operations occurs away from roads and access to large quantities of water. Although the Forest Service notes that “all engines utilized in</p>	<p>No long-term change in fire-suppression strategies or suppression responses is proposed as part of this mineral exploration project. While fire suppression on the Custer National Forest is primarily the Forest Service’s responsibility, fire suppression equipment will be available with equipment and vehicles utilized for this project per 36 CFR 228.11. As stated in the plan of operations (page 13): “Vehicles will be equipped</p>

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		<p>the operation will be equipped with catalytic converters, mufflers, and spark arrestors with which they were manufactured,” no other provision is made to ensure that the Stillwater Mining Company will take appropriate precautions to prevent fire or have on hand adequate resources to combat a fire if one should start. Given that the proposed exploration program will require heavy equipment as well as the transport and storage of flammable materials during the hottest and driest months of the year, the Proposed Action has the potential to create a significant risk of fire. Given the north facing slopes upon which the exploration will occur and the close proximity of the project area to residential and vacation properties, any significant fire would, at the least, destroy the scenic values that are the basis for the nearby property values and, at the worst, directly threaten nearby properties. Any decision to permit the proposed activity without much more stringent requirements related to fire prevention and management violates the Forest Plan’s requirement to adopt “Fire detection and suppression strategies to respond to threats to life and property, public safety, and resource values” and</p>	<p>with a fire compliant spark arrester, a 5-gallon bucket, a fire Pulaski or shovel, and a fire extinguisher. Pumps and saws will be equipped with spark arresters and fire suppression tools will be readily available when these pumps or saws are operated.” In addition the Plan of Operations specifies that “Open burning of materials and refuse will not be allowed. There shall be no campfires of any type” (page 17).</p> <p>In the event that fire danger is deemed high enough to warrant curtailing mineral exploration activities, the Forest Service has the authority under 36 CFR 228.4(e) to require SMC to further mitigate or cease operations.</p>

Stillwater Mining Company’s Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

Issue Identified	Respondent	Comment	Response to comment
		<p>“appropriate suppression response to control, contain, or confine all wildfires” Forest Plan at p. 38.</p>	
	<p>Charles Sangmeister</p>	<p>.....continuing safety concerns I have about the Hertzler helipad? I’ve mentioned vandalism concerns before and am becoming more concerned with the most recent issues of the new metal “No Hunting” signs being torn out of their frames, the bullet riddled “S-Curves” road sign at the shooting range, and the ignoring of “No Trespassing” signs. Given its location, remoteness, visibility, and vandalism, the security of the helipad sight needs to be a major concern even to the extent that it be done 24/7. Can you also find out if the helicopters will be left at the helipad when not in service? And if not, where will they be? I would rather this be well thought out now instead of dealing with a possible disaster later.</p>	<p>Because the Hertzler helipad is on private lands and therefore not under any Forest Service jurisdiction, safety and vandalism concerns at the site are beyond the scope of the Forest Service’s authority and beyond the scope of this NEPA decision. Safety and vandalism concerns at this site involve Stillwater County law enforcement and Stillwater Mine.</p>

References Cited:

30 U.S.C. 21a. United States Code, 2006 Edition. Title 30 - MINERAL LANDS AND MINING. Available online at: <http://www.gpo.gov/fdsys/pkg/USCODE-2006-title30/html/USCODE-2006-title30-chap2-sec21a.htm>

Stillwater Mining Company's Blitz Project Surface Exploration Drilling Plan of Operations, Custer National Forest, Portal and 23,0 Drill Sites Decision Memo Appendix B – Response to public comment.

36 CFR 228a. Title 36 Parks, Forests, and Public Property, Part 228, Subpart A. Locatable Minerals. Available online at: http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title36/36cfr228_main_02.tpl

40 CFR 1500. Title 40 Protection of the Environment, Council on Environmental Quality Regulations for Implementing NEPA. Available online at: http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?sid=86baf4891a1e0bd9f318e23fd065d2ca&c=ecfr&tpl=/ecfrbrowse/Title40/40cfrv33_02.tpl#1500

Annotated Rules of Montana 17.24.101 to 17.24.189. Rules and Regulations Governing the Montana Hard Rock Mining Reclamation Act. Available online at: <http://deq.mt.gov/hardrock/LawsRules.mcp>

Lopez, David A. 2001. Preliminary Geologic Map of the Red Lodge 30' x 60' Quadrangle, South-Central Montana. Montana Bureau of Mines and Geology Open File No. 423. MBMG sales office, Butte, MT. Available online at: http://www.mbm.g.mtech.edu/pdf_100k/redLodge-tiled.pdf

MTDLI 2012. Montana Department of Labor and Industry Research and Analysis Bureau Local Area Profiles Labor Market Information State and County Economic Fliers webpage. Available at: <http://www.ourfactyourfuture.org/?PAGEID=67&SUBID=273>

USDA 1986. Custer National Forest Land and Resource Management Plan (Forest Plan). U.S. Department of Agriculture, Forest Service. Custer National Forest. Billings, MT.