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July 11, 2022

ATTN: East Boulder Mine Amendment 004 EIS
C/O: Robert Grosvenor
Gardiner Ranger District
P.O. Box 5
Gardiner, MT. 59030

Dear Mr. Gardner:

Thank you for the opportunity to comment on the proposed East Boulder Mine Amendment 004 EIS. On behalf of the Treasure State Resources Association (TSRA), a broad coalition of business and industry, members of organized labor, agriculture and more than 20 other membership associations we'd like to offer our support for Sibanye-Stillwater's proposal for the next phase of tailings and waste rock storage at the East Boulder Mine.

TSRA was organized more than 40 years ago to promote economic development in a manner that protects the natural environment. We are also committed to preserving Montana's way of life by promoting use of our natural resources to sustain our local communities. Sibanye-Stillwater has and continues to demonstrate its commitment to both those goals and we are pleased they intend to remain an active presence in our state for many years.

There is no question that Sibanye-Stillwater's operations are important both to Montana and nationally as a primary source of platinum and palladium, both of which are designated "critical minerals" in the United States. For the past 40 years the company has proven it can mine sustainably and responsibly.

Sibanye-Stillwater also works very closely with communities in the footprint of their operations, in particular by operating under the Good Neighbor Agreement that has been a model for collaboration in Montana.

We encourage you to consider the following as preparation of the Environmental Impact Statement proceeds:

- The proposed Lewis Gulch tailings storage facility (TSF) meets or exceeds all of the engineering design, operating, and closure planning requirements in the Montana Metal Mines Reclamation Act, and its associated plans appropriately address the full life-cycle

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of the facility. Montana's regulations for TSFs have been recognized as among the most stringent in the world. An Independent Review Panel made up of tailings experts who regularly review and audit TSFs have approved the Lewis Gulch design and associated plans in accordance with state law.

- Sibanye-Stillwater already employs state of the art technology for protecting water and air quality at their facilities and proposes to do the same under this proposed amendment. The Dry Fork waste rock storage area will be a lined facility and includes an underdrain system for the protection of water resources, which is a standard of leading-practice that exceeds regulatory requirements.
- Of great importance to our members, and Montana's economy, is the fact that approval of this proposed amendment would likely extend the operation of this facility through approximately 2043. Without the amendment, the East Boulder Mine and its economic benefit to Montana could cease as soon as 2026. The jobs, subsequent tax revenue, and expenditures in the overall economy is hugely significant to our state. A recent report by the Montana Bureau of Business and Economic Research identified Sibanye-Stillwater's operations contribute more than \$6 billion to Montana's economy every year. Given the demonstration that the environment can and will be protected, we cannot lose sight of how important an economic driver this project is for Montana.
- As noted earlier, the East Boulder and Stillwater mines are a source of a "critical minerals". The value of their contribution to our national security can't be underestimated.

Again, we appreciate the opportunity to provide public input for the environmental review process and encourage the USFS and MTDEQ to disclose the beneficial long-term impacts Sibanye-Stillwater will continue to provide for our rural communities, Montana and our country.

Sincerely,



Peggy Trenk

Executive Director

Treasure State Resources Association