



KATIE SWEENEY  
*Executive Vice President & General Counsel*

July 18, 2022

Custer Gallatin National Forest  
Gardiner Ranger District  
P.O. Box 5  
Gardiner, MT 59030

**RE: Comments on Notice to Prepare an Environmental Impact Statement for Expansion of Stillwater Mining Company's East Boulder Expansion (Submitted electronically via <https://www.fs.usda.gov/project/?project=61385>)**

Dear Sir/Madam:

On May 27, 2022, the U.S. Forest Service published a notice to prepare an environmental impact statement (EIS) for the proposed expansion of the Sibanye-Stillwater's East Boulder Expansion. (87 Fed. Reg. 32119). The National Mining Association (NMA) appreciates the opportunity to provide these comments in support of the expansion. NMA is a national trade association representing producers of most of America's metals, coal, and industrial and agricultural minerals; the manufacturers of mining and mineral processing machinery, equipment, and supplies; and the engineering and consulting firms, financial institutions, and other firms serving the mining industry.

Sibanye-Stillwater is a global precious metals producer and recycler and operates the East Boulder and Stillwater Mines, as well as a metal recycling and processing facility in Columbus, Montana. Sibanye-Stillwater is the world's largest producer of platinum group metals (PGMs) and is the only primary U.S. producer of platinum and palladium, which are both designated as "critical minerals" in the U.S. Over the past 40 years, Sibanye-Stillwater has proven that mining in Montana can be done sustainably and responsibly.

In 2020, the US Geological Survey estimated that nearly 80 percent of the PGMs needed to meet our clean energy goals came from foreign sources. Importantly, the leading domestic use of PGMs is in catalytic converters to decrease harmful emissions from automobiles.<sup>1</sup> The proposed expansion will allow the continued development of this domestic resource through at least 2043, with the new lined tailings storage facility

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<sup>1</sup> U.S. Geological Survey, 2022, Mineral commodity summaries 2022: p 126., <https://doi.org/10.3133/mcs2022>.


meeting or exceeding all of the engineering design, operating, and closure planning requirements in the Montana Metal Mines Reclamation Act that are among the most stringent in the world. Additionally, Stillwater has committed to alignment with the Global Industry Standard on Tailings Management (GISTM). This international standard was developed in 2020 by the United Nations Environmental Program, Principles for Responsible Investment, and the International Council on Metals and Mining. In fact, the facility already meets the robust engineering design standards in the GISTM.

Not only is the Sibanye-Stillwater expansion critical to our clean energy future, it is essential to the local and state economy. The company is committed to providing significant benefits as evidenced in the Good Neighbor Agreement that it negotiated with its local communities. The University of Montana Bureau of Business and Economic Research has analyzed the economic impact of Sibanye-Stillwater's U.S. Operations to Montana, including these significant positive annual impacts of Sibanye-Stillwater's Montana operations, based on 2021 data:

- More than \$6 billion contributed to Montana's economy every year;
- More than 11,000 permanent year-round external jobs across a wide spectrum of industries;
- Payment of total state tax and non-tax revenues of approximately \$295 million annually;
- Employment for nearly 2,000 employees with an average compensation, before benefits, of more than \$150,000 per year, which is more than double the state average and which results in over \$260 million in total annual payroll expenditures; and
- Expenditures on purchases of over \$430 million in 2021, including nearly \$225 million of purchases in Montana.

NMA appreciates the opportunity to provide these comments. NMA strongly supports Sibanye-Stillwater's proposed expansion as in the public interest, integral to clean energy and as a mainstay of the state and local economy. If you have any questions, please contact me at [ksweeney@nma.org](mailto:ksweeney@nma.org) or (202) 463-2627.

Sincerely,

A handwritten signature in black ink that reads "Katie Sweeney". The signature is written in a cursive, flowing style.

Katie Sweeney