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July 31, 2023

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

Dear Mr. Grosvenor:

Thank you for the opportunity to comment on the draft EIS for the East Boulder Mine Amendment 004. 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. For four decades Sibanye-Stillwater has, and continues to demonstrate its shared commitment to both those goals and we are pleased they intend to remain an active presence in our state for many years. They are a testament to the fact that mining in Montana can be done sustainably and responsibly.

Sibanye-Stillwater is the only primary producer of critical minerals platinum and palladium in the United States and is a global leader in recycling platinum, palladium and rhodium – all of which are of tremendous value in promoting our national security and supply chain independence.

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. Through that collaborative effort they have even put standards in place that exceed state and federal standards.

We encourage you to consider the following comments:

- Sibanye-Stillwater provides excellent paying jobs for nearly 2,000 residents in south-central Montana and contributes over \$6 billion in economic output to Montana. If Amendment 04 is not approved, operations at the East Boulder Mine could not continue beyond 2025, although the company has proven PCM reserves until 2062. That would leave local communities and residents to suffer a premature and significant loss in economic and social benefits that cannot be replaced.
- Sweet Grass County would be especially hard hit, prematurely losing property and metal mines license taxes that represent over half their annual revenue. Such a loss is clearly an adverse impact and should be disclosed as such.
- Further, the analysis area identified in the draft EIS only discloses impacts in Sweet Grass County. Sibanye-Stillwater's operations impact a much larger geographic area. The draft EIS should also take into account how much tax revenue will be lost in Park, Stillwater and Yellowstone Counties under the No Action Alternative. That consideration should also be made with regard to the impact of the No Action Alternative on Montana's economy. A MT Bureau of Business and Economic Research study recently found that the company's operations annually contribute over \$6 billion to Montana's economic output, including over \$260 million in payroll taxes, over \$60 million in direct employee taxes, over \$500 million in additional household income and create over 6,000 additional total jobs in Montana.
- On the environmental front, Sibanye-Stillwater thoughtfully designed the Dry Fork Waste Rock Area with a double-liner system to provide added protection of water quality in the East Boulder River. The proposed design goes above and beyond industry standards and exemplifies the company's commitment to environmental stewardship.
- Finally, we believe the agencies considered a reasonable range of alternatives and made the correct determination that Alternative 3, the geomorphic reclamation of the Lewis Gulch TSF and the Dry Fork WRSA is not technically feasible at this time. This conclusion is widely supported by extensive research already done by the company and their GNA partners.

As has been their practice historically, Sibanye-Stillwater has thoroughly vetted their proposed amendment for tailings and waste rock storage facilities at the East Boulder Mine. They continue to support the surrounding communities and work with their many partners to

TSRA Comments, Page 3  
July 31, 2023

provide critical minerals that are key to our national security. We appreciate this opportunity to comment and respectfully ask that you support their proposal for continued operation.

Sincerely,

A handwritten signature in black ink, appearing to read "Peggy Trenk". The signature is fluid and cursive, with the first name "Peggy" and last name "Trenk" clearly distinguishable.

Peggy Trenk  
Executive Director  
Treasure State Resources Association