



July 27, 2023

Dear Mr. Grosvenor and Mr. Jones,

We would like to thank the USDA Forest Service, the Custer Gallatin National Forest (CGNF), and the Montana Department of Environmental Quality (DEQ) for preparing the Environmental Impact Statement for the proposed major amendment (Amendment 004) in the East Boulder Mine.

As owners and operators of a local bank in Big Timber, Montana, we realize the value of Sibanye-Stillwater's presence in our community, business, and the State of Montana. Through their contribution of taxes, community involvement, and employment, the Sibanye-Stillwater has a visible impact within our community. The communities of Sweet Grass County and Wheatland County are stronger, better served, and healthier because of the mine.

We support Sibanye-Stillwater's proposal for tailings and waste rock storage facilities at the East Boulder Mine not only because of the benefits it adds to our community, but also because of the evidence it can be completed responsibly. Over the past four decades, this company demonstrated how a sustainable and responsible mine is run. It is our understanding that other mines throughout the world view Sibanye-Stillwater as the leader in responsible mining. From my personal tour of the mine, I am impressed with their professionalism and conscientiousness of practices both in business and mining.

Furthermore, the mine is the only US primary producer of Platinum Group Metal (PGM), a critical mineral. As a global leader in PGM production and recycling, the mine is essential to our local communities, Montana, and our national security. It is imperative that the agencies approve this application, allowing the mine to remain operational and continuing access to this important resource.

The rationale behind our support for the amendment is outlined in the following data:

1. Socioeconomic Effect

- Sibanye-Stillwater is the lifeblood of our communities in south-central Montana. The company provides excellent paying jobs for nearly 2,000 employees across multiple counties and ultimately contributes over \$6 billion in economic output to Montana. If Amendment 004 is not approved, operations at the East Boulder Mine could not continue beyond 2025.
- Sibanye-Stillwater has proven PGM ore reserves until 2062. If the East Boulder Mine discontinued operations, close to four decades of socioeconomic benefits and growth opportunities would be lost.
- Sibanye-Stillwater's property taxes and metal mines license taxes represent over half of Sweet Grass County's revenue. I understand that Sweet Grass County would lose nearly \$8 million if operations were to cease in five years. This would be a significant adverse impact and should be disclosed as such.

- The analysis area identified in the Draft EIS only discloses impacts in Sweet Grass County. Due to the significant socioeconomic contributions of Sibanye-Stillwater in Montana, the Draft EIS should analyze and disclose the direct impacts to the neighboring counties as well. How much tax revenue will be lost in Park, Stillwater, Carbon, and Yellowstone Counties under the No Action Alternative? What is the loss of tax revenue to the State of Montana, and how does this indirectly impact all Montanans?
- According to a University of Montana Bureau of Business and Economic Research study, 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.

2. Evidence of Responsible/Sustainable Mining

- **Environmental Protection:** Through the Good Neighbor Agreement, Sibanye-Stillwater and the GNA Councils have collaborated for more than two decades to balance the need for positive rural economic development while minimizing impacts on the physical and human environments. Through this collaborative arrangement, they have developed standards that exceed state and federal standards. Please consider acknowledging that the use of these best current available technologies, including water treatment, air quality control measures, and traffic and housing limitations, have created benefits for our communities, while limited the impacts on our environment.
- **Alternatives Dismissed:** The CGNF subject matter experts and DEQ concluded that the "studies conducted to date have not established the feasibility of producing a geotechnically stable filtered tailings product that can be transported and placed in a FTSF that will remain free-standing and stable and would result in a reduction in environmental risk." Sibanye-Stillwater and the GNA have partnered to research alternative tailings storage technologies, including filtered tailings/dry stacking, for more than twenty years. This extensive research supports the Agencies' conclusion that this alternative is simply not technically feasible at this point in time.

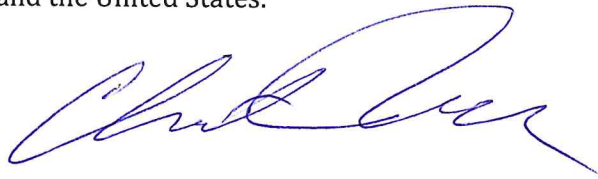
3. Resource Importance as Critical Mineral

- As identified in the Draft EIS, the Department of Interior's United States Geological Survey has identified PGMs as "critical minerals." The Draft EIS should analyze the socioeconomic indirect effects to national security and the vulnerabilities of supply-chain disruptions under the No Action Alternative.

Citizens Bank & Trust supports Sibanye-Stillwater's proposal due to the socioeconomic benefits, evidence of sustainable mining, and the importance of the resource. We appreciate your thorough analysis and the opportunity to participate in the public process. If the amendment is approved, continued operations at the East Boulder Mine will have beneficial long-term impacts for our rural communities, Montana, and the United States.

Respectfully,

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