



August 7, 2023

Mr. Robert Grosvenor
Custer Gallatin National Forest (CGNF)
Gardiner Ranger District
PO Box 5
Gardiner, MT 59030

Mr. Craig Jones
Montana Department of Environmental Quality
(DEQ), Director's Office
PO Box 200901
Helena, MT 59620-0901

RE: East Boulder Mine AM4

Dear Sirs,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for Stillwater Mining Company's (SMC) "East Boulder Mine Amendment 004" dated June 2023.

The Greater Yellowstone Coalition (GYC) is a regional conservation organization based in Bozeman, MT with offices in Idaho and Wyoming and over 90,000 supporters from across the country and withing the Northern Rockies. Our mission is to protect the lands, waters, and wildlife of the Greater Yellowstone ecosystem (GYE) and for future generations. Our members include residents living in communities throughout Sweet Grass and Stillwater Counties and visitors enjoying the 20-million acre GYE, the Custer Gallatin National Forest, the Boulder Rivers and the Absaroka-Beartooth Wilderness.

Good Neighbor Agreement

The project area and surrounding region is home to rivers, wildlife, large landscapes and socio-economic factors which are identified as unique to the the GYE, the Custer Gallatin National Forest and Montana. **GYC strongly supports** the Good Neighbor Agreement (GNA) between Stillwater Mining Company, Northern Plains Resource Council, Stillwater Protective Association and Cottonwood Resource Council. This landmark agreement is an example of "best practices" we believe are critical to the future of mining in Montana as the industry participates with local organizations and concerned citizens to identify and mitigate community and environmental concerns associated with mining and processing activities. We believe this standard is a "desired condition" for which any hard rock mining or exploration within the unique Greater Yellowstone ecosystem.

Filtered/Dry Tailings

In June of 2022, three members of the GYC staff, including our Wildlife Coordinator, toured the tailings facility and general milling area with staff from SMC. This was during the initial scoping process, after which GYC signed onto a public comment letter submitted by Earthjustice on behalf of Montana Trout Unlimited, Earthworks, and GYC in July 2022.

An important comment of that scoping letter was that "The EIS should consider a filtered/dry tailings alternative to tailings storage." As per Section B.2.2 (page B-4) of the subsequent DEIS, it was determined that a "FTSF or dry stack facility is not a reasonable alternative, as defined in 40 CFR 1508.1(z)."

GYC encourages the CGNF, SMC, DEQ, and the GNA along with other relevant experts to consider a mutually agreed-upon “tailings monitoring committee.” Such commitment and transparency are important to the community and residents of the Boulder River valley and beyond.

Custer Gallatin Working Group

In the spring of 2023, as a member of the Custer Gallatin Working Group (CGWG) GYC strongly endorsed the formation of a CGWG subcommittee to engage directly in the East Boulder Mine AM4 DEIS comment process. Given the importance of the Stillwater Mine to the local and state-wide economy, the importance of Platinum Group Metals (PGM) resources¹, the specific land allocation of the 102,000 acre Stillwater Complex in the recently updated Custer Gallatin Forest Plan (see Record of Decision)² and the range of constituencies represented by CGWG members³, there are few projects more demanding of the CGWG attention. Two members of the GYC Montana Lands Team attended the May 4, 2023 CGWG tour of the East Boulder Mine tailing and processing facilities. Joe Josephson also attended the joint DEQ-USFS public meeting on July 12, 2023 in Big Timber.

As a seated member of the CGWG and member of the East Boulder Mine sub-committee, GYC supports the East Boulder Mine AM4 DEIS comment letter submitted by the Working Group.

Alternative 3

GYC supports the DEQ and USFS preferred Alternative 3. Under Alternative 3, the Dry Fork Waste Rock Storage Area (WRSA) storm channels would be sized to convey a 1-in-200 year, 24-hour precipitation event. Alternative 3 would also use geomorphic or landform design principles for the Lewis Gulch TSF and Dry Fork WRSA.

Although this adds some additional acreage to the footprint, **GYC supports** the adoption of geomorphic designs. GYC does question any claimed reductions in “visual impacts” (Section 2.6.1, page 2-57). This is due to the nature of the overall mine footprint even after closure and remediation, and the fact that the significantly larger East Boulder TSF does *not* employ these design features. **GYC encourages** SMC to consider how appropriate geomorphic designs could be incorporated into the Lewis Gulch TSF.

Conclusion

We appreciate your full and complete attention to these comments and the many others submitted by interested organizations, businesses, landowners and individuals. We look forward to the CGNF and DEQ’s final decision regarding the Environmental Impact Statement on the East Boulder Mine tailings and waste rock storage expansion.

Respectfully submitted,



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¹ <https://www.usgs.gov/news/national-news-release/us-geological-survey-releases-2022-list-critical-minerals>

² <https://www.fs.usda.gov/detail/custergallatin/landmanagement/planning/?cid=FSEPRD897383>

³ <https://www.cgwg.org/>