KATIE SWEENEY
Executive Vice President & Chief Operating Officer

August 9, 2023

Craig Jones
Office of the Director
Montana Dept. of Environmental Quality
PO Box 200901
Helena, MT 59620-0901

Robert Grosvenor
Custer Gallatin National Forest
PO Box 5
Gardiner, MT 59030

RE: Comments on Draft Environmental Impact Statement for Stillwater Mining Company's East Boulder Expansion (Submitted electronically via https://cara.fs2c.usda.gov/Public//CommentInput?Project=61385)

Dear Messrs. Jones and Grosvenor:

On June 23, 2023, a notice of availability of the draft environmental impact statement (EIS) for Sibanye-Stillwater's East Boulder Expansion was published in the Federal Register. (88 Fed. Reg. 41102). The National Mining Association (NMA) appreciates the opportunity to provide these comments in support of the expansion. The NMA is the only national trade organization that serves as the voice of the U.S. mining industry and the hundreds of thousands of American workers it employs before Congress, the federal agencies, the judiciary, and the media, advocating for public policies that will help America fully and responsibly utilize its vast natural resources.

America's mining industry supplies the essential materials necessary for nearly every sector of our economy – from technology and healthcare to energy, transportation, infrastructure, and national security. The NMA has a membership of nearly 280 companies and organizations involved in every aspect of mining in the United States. NMA's members, including Sibanye-

Stillwater, work to ensure America has secure and reliable supply chains, abundant and affordable energy, and the American-sourced materials necessary for U.S. manufacturing, national security, and economic security, all delivered under world-leading environmental, safety, and labor standards.

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. The proposed expansion of tailings and waste rock storage will be done pursuant to a carefully designed plan to address potential environmental impacts.

The plan includes a new lined tailings storage facility 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.

Proposed Expansion Supports the Local and State Economies

The proposed expansion would provide the opportunity for Sibanye-Stillwater to continue operations for another 40 years, with all the commensurate benefits to the state and local economy and reduction in reliance on foreign sources of these important metals. Continued operations are critically important to both the state and local economies.

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.

Proposed Expansion Reduces Reliance on Foreign Minerals and Secures Domestic Supply Chains

In 2023, the U.S. Geological Survey estimated that the U.S. imports 66 percent of the platinum and 26 percent of the palladium needed to meet our clean energy goals. [1] Importantly, the leading domestic use of PGMs is in catalytic converters to decrease harmful emissions from automobiles. PGMs are also increasingly essential in electronic applications including computer hard disks and hybridized integrated circuits.

Clearly, our platinum import reliance is troubling. It can be reduced however, by approving the proposed expansion. Sibanye-Stillwater's operations extract and process PGM ore from the J-M Reef, the only known significant source of PGMs in the U.S. and the highest grade PGM deposit in the world. And, while the 26 percent import reliance for palladium may not sound like a dramatic crisis, geopolitical developments demonstrate the need for a strong domestic supply chain anchored by Sibanye-Stillwater's mining and recycling operations. Palladium is one of the most notable critical minerals affected by the Ukraine crisis because it is a critical input to the automotive and semiconductor industries and Russia supplies nearly 37 percent of global production.[2] Russian palladium illustrates one of the key geopolitical features of critical minerals: alternative supplies are often located in equally challenging markets. The second largest palladium producer is South Africa, where the mining sector has been wracked by strikes for the past decade.[3] In addition, South Africa applies non-automatic licensing to palladium exports.[4]

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[1] Mineral commodity summaries 2022: p 126., https://doi.org/10.3133/mcs2022.

[2] U.S. Geological Survey, 2023, Mineral Commodity Summaries 2023, p. 138-39. https://pubs.usgs.gov/periodicals/mcs2023/mcs2023.pdf.

[3] Center on Global Energy Policy at Columbia University, School of International and Public Affairs, "Supply of Critical Minerals Amid the Russia-Ukraine War and Possible Sanctions," April 2022, https://www.energypolicy.columbia.edu/wp-content/uploads/2022/04/CriticalMinerals_CGEP_Commentary_041522.pdf.

[4] Organisation for Economic Co-operation and Development, "The supply of critical raw materials endangered by Russia's war on Ukraine," August 4, 2022, https://www.oecd.org/ukraine-hub/policy-responses/the-supply-of-critical-raw-materials-endangered-by-russia-s-war-on-ukraine-e01ac7be/.

Alternative 3 Appropriately Balances the Environment and the Benefits of Continued Mining

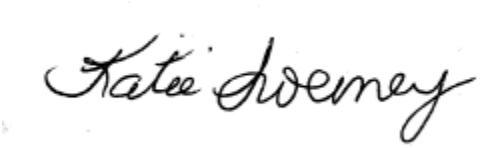
The NMA strongly supports Alternative 3, the preferred alternative of both the Forest Service and Montana Department of Environmental Quality. Importantly, this alternative incorporates geomorphic landform design concepts for the tailings and waste rock storage facilities to improve long-term stability and stormwater management.

Additionally, NMA agrees with the decision to exclude consideration of a filtered tailings storage facility alternative. The agency experts appropriately concluded that such an alternative is not technically or economically feasible based on "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." Stillwater and its Good Neighbor Agreement participants have partnered to research alterative tailings storage technologies, including filtered tailings/dry stacking, for more than twenty years. The extensive research supports the agencies' conclusion.

Conclusion

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. The NMA appreciates the opportunity to provide these comments. If you have any questions regarding these comments, please contact me at ksweeney@nma.org or (202)463-2627.

Sincerely,



Katie Sweeney