Data Submitted (UTC 11): 7/6/2023 3:27:52 AM
First name: Janal
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Organization:
Title:
Comments: Dear Mr. Grosvenor and Mr. Jones,

I would like to thank the U.S. Department of Agriculture Forest Service, Custer Gallatin National Forest (CGNF) and the Montana Department of Environmental Quality (DEQ) for preparing the East Boulder Mine Amendment 004 Draft Environmental Impact Statement.

I am an employee of Stillwater Mining Company residing in south-central Montana and directly affected by the Amendment 4 decision. I respectfully request that the Agencies consider the following comments.

First and foremost, I support the Stillwater Mining Company's proposal for new tailings and waste rock storage facilities at the East Boulder Mine. The Stillwater Mining Company has proven over the past four decades that mining in Montana can be done sustainably and responsibly. Both platinum and palladium are on the United States Geological Survey's 2022 critical minerals list. As a global leader in Platinum Group Metal (PGM) production and recycling, as well as the only primary producer of PGMs in the United States, it is essential to our local communities, the State of Montana, and our country that the agencies approve SMC's application.

The Stillwater Mining Company is the lifeblood of our communities in south-central Montana. The company provides excellent paying jobs for nearly 2,000 residents across multiple counties. If Amendment 004 is not approved, operations at the East Boulder Mine could not continue beyond 2025. The Stillwater Mining Company 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. Loss of about $7,940,550 in Class 2 property taxes and metal mine license taxes in Sweet Grass County when operations cease in five years, representing about 56 percent of county revenues. This is 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 the Stillwater Mining Company 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, and Yellowstone Counties under the No Action Alternative? What is the loss of tax revenue to the State of Montana and how does the indirectly impact all Montanans? As identified in the Draft EIS, PGMs are identified as a Critical Mineral by the United States Geological Survey. The Draft EIS should analyze the socioeconomic indirect effects to national security and the vulnerabilities of supply-chain disruptions under the No Action Alternative.

Through the Good Neighbor Agreement, the Stillwater Mining Company 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 limitations, have a beneficial impact on both the physical and human environment.

I support the conclusion of the CGNF subject matter experts and DEQ in their conclusion 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." Stillwater and its stakeholders 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.

I support Sibanye-Stillwater Mine.

I appreciate the opportunity to participate in the public process and appreciate your thorough analysis. If approved, continued operations at the East Boulder Mine is beneficial for our rural communities, Montana, and our country.

Respectfully,

Janal Abshire