Data Submitted (UTC 11): 7/16/2023 2:33:59 AM
First name: Don
Last name: Allen
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 Sibanye-Stillwater residing in south-central Montana and the Agencies' decision on this permit would directly affect me. 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 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, 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? 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.

Sibanye-Stillwater is the lifeblood of our communities in south-central Montana. The company provides excellent paying jobs for nearly 2,000 residents 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'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 per year if operations were to cease in five years. This would be a significant adverse impact and should be disclosed as such.

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.

I believe that the Agencies considered and analyzed a reasonable range of alternatives, including the geomorphic reclamation of the Lewis Gulch TSF and the Dry Fork WRSA, described in Alternative 3.

The East boulder mine is not only good for Montana, it provides employment for people in other states. Folks that stay in our towns during their work week. Puts money in our economy. In turn, Montana thrives.

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,

Don Allen