Data Submitted (UTC 11): 7/21/2023 1:40:40 AM
First name: Melkon
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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 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.

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 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 per year if operations were to cease in five years. This would be a significant adverse impact and should be disclosed as such.

As identified in the Draft EIS, the Department of Interior's United States Geological Survey has identified PGMs are identified 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.

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.

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." Sibanye-Stillwater and the GNA 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 that this alternative is simply not technically feasible at this point in time.

How will not approving the permits for the tailings dam affect the economy?

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,

Melkon Andonian