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Comments: Thank you for the opportunity to comment on the East Boulder Mine Lewis Gulch TSF and Dry Fork WRSA draft EIS.

I support the Agencies recommendation for approval of Alternative 3. I also recommend strengthening the impact analysis of the following subjects in the final EIS:

1.Critical Minerals: The East Boulder and Stillwater Mines have unique value to the nation. They are the only mines in the US that produce PGM minerals in significant quantity. Platinum, palladium, rhodium, and iridium are all on the nation's critical minerals list. I would like to see a section dedicated to the discussion of the national economic security that continued PGM mining at East Boulder brings to our nation. In other words, the EIS should move beyond presenting just the facts about critical minerals and explain to the reader why domestic critical mineral production is vital to the US.

2.IRP: the DEIS accurately describes the IRP's responsibility with respect to review and approval of the Lewis Gulch TSF design report. I would like to see a sentence or two added regarding the IRP's authority to approve the design report (i.e. MCA states that 'the panel's determination is conclusive') from DEQ's perspective and how the US Forest Service also relies on the IRP's expertise. The IRP's authority in Montana is unique; the members of Stillwater's IRP have stated on many occasions that there are no other tailings review board jurisdictions that they are aware of nationally or internationally where an tailings review board is delegated the same level of authority. I think this is important to point out because most tailings review boards report their recommendations only to the company and do not make any regulatory decisions. Readers from outside of Montana may not understand this context.

3.The largest percentage of East Boulder employees live in Park County. The annual Hard Rock Impact Plan reports consistently show that more employees and their families live in Park County than in Sweet Grass County (by a small percentage). In Section 3.15.1, I would like to see Park County given the same level of analysis as Sweet Grass County.

4.In addition to voluntary tailings and waste rock studies produced in conjunction with the Good Neighbor Agreement, the East Boulder Mine and Stillwater Mine operations have been working diligently to make improvements to the US Region tailings management system in order to verify conformance with the Global Industry Standard on Tailings Management (GISTM). Since 2020, the GISTM is considered the international gold standard for TSF design and TSF management. The GISTM was developed as a collaboration between three organizations: the UN Environmental Program; Principles for Responsible Investment; and the International Council on Mining and Metals. A press release from Sibanye-Stillwater details the process of GISTM conformance and certifies that the East Boulder TSF and future Lewis Gulch TSF are in conformance with the GISTM standard.

https://thevault.exchange/?get_group_doc=245/1690979302-ssw-GISTM-confromance-disclosure-04aug2023.pdf

5.The DEIS appears to rely on waste rock and tailings geochemical analyses and data from more than 10 years ago. While the data from 2012 is certainly accurate information, there have been more than 10 years of additional geochemistry data collected and reported for both waste rock and tailings. Specifically, acid-base accounting, whole rock metals analyses, and synthetic leaching procedure metals analyses are collected on a quarterly basis. The available data would provide at least 80 additional samples and more than one thousand data points to supplement the tailings and waste rock geochemistry data statistics presented in the DEIS (DEIS

references the 2012 EIS geochemistry statistics). It is my understanding that the company has provided an electronic file containing the additional data for the Agencies use with their DEIS comment letter.

6.I understand the DEIS reliance on the GNA traffic plan and associated statistics to characterize current traffic conditions and impact on the local community. On the other hand, a private agreement between Sibanye-Stillwater and the Good Neighbor Councils should not be used to assume future conditions or be translated as a regulatory condition. Please clarify this in the Final EIS. I think it would be valuable to compare the traffic study completed for the original East Boulder EIS and estimated traffic counts with current conditions. The total vehicle trips associated with the East Boulder Mine operations today are significantly lower than predicted in the approved 1992 EIS.