

Data Submitted (UTC 11): 8/9/2023 12:58:26 PM

First name: Ellie

Last name: Wilson

Organization:

Title:

Comments: Dear Mr. Grosvenor and Mr. Jones,

I would like to thank the U.S. Department of Agriculture Forest Service, the 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 live and work in south-central Montana and my livelihood/my community depends on Sibanye-Stillwater's continued operations. I respectfully request that the Agencies consider the following comments.

First and foremost, I support Sibanye-Stillwater's proposal for tailings and waste rock storage facilities at the East Boulder Mine. Sibanye-Stillwater 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 producer of primary PGMs in the United States, it is essential to our local communities, Montana, and our national security that the Agencies approve this application.

***Socioeconomics**

oSibanye-Stillwater is the lifeblood of our communities in south-central Montana. The company provides excellent paying jobs for nearly 2,000 employees 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.

oSibanye-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.

oSibanye-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 if operations were to cease in five years. If this would be a significant adverse impact and should be disclosed as such.

oThe 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, Carbon, and Yellowstone Counties under the No Action Alternative? What is the loss of tax revenue to the State of Montana, and how does this indirectly impact all Montanans?

oAccording 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.

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

Alternatives Dismissed

oI 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 alternative tailings storage technologies, including filtered tailings/dry stacking, for more than twenty years. This extensive research supports the Agencies' conclusion that this alternative is simply not technically feasible at this point in time. I appreciate the opportunity to participate in the public process and appreciate your thorough analysis. If approved, continued operations at the East Boulder Mine will have beneficial long-term impacts for our rural communities, Montana, and the United States.

Respectfully,

NAME: Ellie Wilson

EMAIL: ellie.ash@gmail.com

ADDRESS: 31 W 4th Ave N