

Data Submitted (UTC 11): 8/9/2023 3:12:51 PM

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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, 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 believe Sibanye-Stillwater's position as the only primary producer of critical minerals platinum and palladium, as well as one of the largest global recyclers of platinum, palladium, and rhodium is important to our national security and supply chain independence. 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

o Sibanye-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.

o 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.

o As 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.

* Environmental Protection

* 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 Rejected

o 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 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,
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