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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 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.

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 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. The extensive research supports the agencies' conclusion that this alternative is simply not technically feasible at this point in time.

Sibanye Stillwater demonstrates commitment to upholding and continual improvement of environmental standards evident through the 20+years of operating history at the East Boulder mine. The benefit to the community, employees, and local businesses is a key outcome of producing a critical mineral that improves air quality throughout the country in the production of auto catalysts. I support modern mining in the US and doing it in a manner that leads the world in responsible production and use of the resources needed for a modern society.

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,  
William Kloth

