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First name: Chance

Last name: Leggett

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.

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

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.

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 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.

I would like to know why these out of state interest groups are legitimately trying to get in the way of not only thousands of jobs but also one of the very few things that actually works to reduce emissions on nearly every vehicle in the world? Are they truly against having cleaner air? Are they just in this for the money that they're making by trying to get mines so far into litigation that they have to close their doors and lay off thousands of people? I think they are. I think that they don't actually care about anything but their own wallets. If this permitting goes to litigation and we all lose our livelihoods because of them. I think they should have to do federal prison time as reparation. This mine is an integral part of not only making our environment healthier but our world better. The metals that we produce are used in catalytic converters, surgical implements, joint replacements, phones, computers, vehicle components, and many many other things that every single one of us use everyday. These folks with these special interest groups are no exception and are hypocrites for trying to get us shut down for something that has been planned for and has multiple contingencies in place. Let it go through.

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,

Chance Leggett