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July 15, 2026

Erin Fryer
Environmental Coordinator
U.S. Forest Service
Custer Gallatin National Forest
Supervisor's Office
ATTN: Stillwater Mine Complex Amendment 14
P.O. Box 130
Bozeman, MT 59771

RE: Scoping Comments on the Notice of Intent to Prepare an Environmental Impact Statement for the Stillwater Mine Complex Amendment 14.

Dear Ms. Fryer:

On June 15, 2026, the U.S. Forest Service (Forest Service) published a notice of intent to prepare an environmental impact statement (EIS) for the proposed amendment to the Sibanye-Stillwater's Stillwater Mine plan of operations in the Federal Register.¹ The National Mining Association (NMA) appreciates the opportunity to provide these comments on the scope of the EIS needed to move this critically important project forward. The NMA is the only national trade organization that serves as the voice of the U.S. mining industry and the hundreds of thousands of American workers it employs before Congress, the federal agencies, the judiciary, and the media, advocating for public policies that will help America fully and responsibly utilize its vast natural resources.

America's mining industry supplies the essential materials necessary for nearly every sector of our economy. The NMA has a membership of more than 250 companies and organizations involved in every aspect of mining in

¹ 91 Fed. Reg. 35,952.

the United States. NMA's members, including Sibanye-Stillwater (the project proponent), work to ensure America has secure and reliable supply chains, abundant and affordable energy, and the American-sourced materials necessary for U.S. manufacturing, national security, and economic security, all delivered under world-leading environmental, safety, and labor standards.

Sibanye-Stillwater is a global precious metals producer and recycler and operates the East Boulder and Stillwater Mines, as well as a metal recycling and processing facility in Columbus, Montana. Sibanye-Stillwater is the world's largest producer of platinum group metals (PGMs) and is the only primary U.S. producer of platinum and palladium, which are both designated as "critical minerals" in the U.S. Over the past 40 years, Sibanye-Stillwater has proven that mining in Montana can be done sustainably and responsibly. The proposed expansion would update the Stillwater Mine's long-term integrated waste management plan and will be done pursuant to a carefully designed plan to address potential environmental impacts. The proposed expansion would provide the opportunity for Sibanye-Stillwater to continue operations for another 36 to 42 years.

As the Forest Service proceeds with the preparation of the EIS and development of alternatives, the NMA urges the service to keep the following considerations in mind: the urgent need to secure key mineral supply chains; the project proponent's rigorous mitigation and environmental protection measures included in the mine plan of operations; and the socio-economic benefits of the project.

Importance of the Stillwater Mine in Securing Mineral Supply Chains

Over the last decade, there has been growing bipartisan concern over the U.S.' increasing mineral import reliance. Despite being home to vast mineral reserves, the U.S. is facing unprecedented and dangerous mineral supply chain challenges, exacerbated by war-related supply chain challenges as well as the skyrocketing mineral demand due to the rapid electrification of our economy.

In response to growing concerns, the Trump administration has prioritized finding solutions to address our mineral supply chain vulnerability. Among the administration's early actions was Executive Order 14241, "Immediate Measures to Increase American Mineral Production," which prioritizes tackling the threat to U.S. mineral security by prioritizing mining on federal lands, tackling permitting challenges and providing targeted financial support

to domestic producers.² Many of the minerals needed for our economic and national security can be sourced here in the U.S.

The importance of the Stillwater Mine cannot be overstated: as mentioned above, Sibanye-Stillwater is the only primary producer of platinum group metals (PGMs) in the United States. Per the U.S. Geological Survey (USGS), the leading domestic use for PGMs was in catalytic converters to decrease harmful emissions from automobiles.³ PGMs are also increasingly essential in electronic applications including computer hard disks and hybridized integrated circuits.⁴ Notably, platinum's growing role in military application's such as components of fighter aircraft and submarines led to its inclusion on the North Atlantic Treaty Organization's list of 12 defense-critical raw materials.⁵

According to the USGS, in 2025 PGMs were among mineral commodities that had the largest percentage increases in consumption.⁶ While consumption grew, so did reliance on imports of imported PGMs, with the U.S. 89 percent reliant on imports of platinum and 57 percent reliant on imports of palladium.⁷ This is a dramatic increase from 2023 when the USGS estimated that the U.S. was 66 percent import-reliant on platinum and 26 percent on palladium.⁸ This increasing reliance on imported PGMs is deeply troubling. With approval of the amendment, Sibanye-Stillwater's can help boost domestic PGM supplies for decades. The company extracts and processes PGM ore from the J-M Reef, the only known significant source of PGMs in the U.S. and the highest grade PGM deposit in the world.

Sibanye-Stillwater's Commitment to Sustainable and Responsible Mining

Sibanye-Stillwater has a decades-long history of excellent environmental stewardship that guides its efforts to update and expand long-term integrated waste management plans for waste rock storage at the Stillwater Mine. The company fully understands that to maintain public support for the

² E.O. 14017, "America's Supply Chains." 90 Fed. Reg. 13,673 (March 25, 2025).

³ U.S. Geological Survey, 2026, *Mineral commodity summaries 2026*(MCS 2026): U.S. Geological Survey, p.148, available at <https://pubs.usgs.gov/periodicals/mcs2026/mcs2026.pdf>.

⁴ *Id.*

⁵ NATO News Release, NATO releases list of 12 defence-critical raw materials, Dec. 2024, available at <https://www.nato.int/en/news-and-events/articles/news/2024/12/11/nato-releases-list-of-12-defence-critical-raw-materials?selectedLocale=>.

⁶ MCS 2026 at 148.

⁷ *Id.* at pg. 15.

⁸ U.S. Geological Survey, 2022, *Mineral commodity summaries 2022*: p 126., available at <https://doi.org/10.3133/mcs2022>.

social license to operate, they must be a sustainable business that manages water, hazardous materials and waste, and air quality responsibly.

To that end, Sibanye-Stillwater is incorporating multiple double-lined waste rock storage areas to assist in preventing groundwater and surface-water contamination. Additionally, Sibanye-Stillwater will maintain groundwater monitoring through an updated water resources monitoring plan. Because the waste rock expansion would affect Nye Creek, Sibanye-Stillwater proposes a full creek relocation that incorporates ecological restoration features and would produce approximately 0.6 acres of new wetlands. Sibanye-Stillwater is proposing to control soil erosion and stormwater runoff with engineered channels, berms, spillways, and best management practices. Sibanye-Stillwater will reclaim disturbed areas concurrently by using growth media, native vegetation, and habitat restoration. Finally, Sibanye-Stillwater will continue to monitor the environmental performance long-term through groundwater, surface-water, geotechnical, and post-closure programs.

Proposed Sibanye-Stillwater Expansion Supports the Local and State Economies

The University of Montana's Bureau of Business and Economic Research has analyzed the economic impact of Sibanye-Stillwater's U.S. Operations to Montana, including these significant positive annual impacts of Sibanye-Stillwater's Montana operations, based on 2021 data:

- More than \$6 billion contributed to Montana's economy every year;
- More than 11,000 permanent year-round external jobs across a wide spectrum of industries;
- Payment of total state tax and non-tax revenues of approximately \$295 million annually;
- Employment for nearly 2,000 employees with an average compensation, before benefits, of more than \$150,000 per year, which is more than double the state average and which results in over \$260 million in total annual payroll expenditures; and
- Expenditures on purchases of over \$430 million in 2021, including nearly \$225 million of purchases in Montana.⁹

Aside from the economic benefits, Sibanye-Stillwater dedicates significant resources to community engagement and social upliftment. Over 25 years ago, the company entered into a Good Neighbor Agreement, developed in

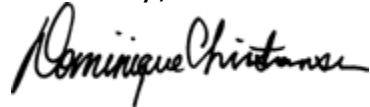
⁹ Bureau of Business and Economic Research, the University of Montana, "Updating the Economic Impacts of Sibanye-Stillwater in Montana," June 2022 *available at* <https://bber.umt.edu/pubs/Econ/Sibanye-Stillwater-Economic-Contributions-Update.pdf>.

collaboration with the local environmental community. The agreement ensures that the natural environment is protected while encouraging responsible economic development. Furthermore, Sibanye-Stillwater's employee-led Community Giving Team is committed to supporting charitable and non-profit interests in and around the communities where Sibanye-Stillwater employees live and work. In 2024, that initiative supported local non-profit organizations that focus on rural emergency and healthcare services, education, community improvement, and environmental stewardship.

Conclusion

The NMA appreciates the opportunity to provide these comments. The NMA strongly supports Sibanye-Stillwater's mine expansion project as in the public interest and necessary for securing supply chains and lifting the local and state economy. We urge the Forest Service to strictly adhere to the established schedule for completion of the EIS as the project is essential for assuring U.S. supply chains of key minerals. If you have any questions regarding these comments, please contact me at dchristianson@nma.org.

Sincerely,

A handwritten signature in black ink, reading "Dominique Christianson". The signature is fluid and cursive, with the first name "Dominique" being more prominent than the last name "Christianson".

Dominique Christianson
Associate General Counsel