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July 17, 2026

Erin Fryer
Environmental Coordinator
Custer Gallatin National Forest
PO Box 130
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SUBMITTED ELECTRONICALLY VIA:

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=296522>

Craig Jones
Senior MEPA Coordinator
Montana Department of Environmental Quality
PO Box 200901
Helena, MT 59620-0901
Submitted via email to: crajones@mt.gov

RE: Stillwater Mine Complex Amendment 14 EIS #296522

Dear Ms. Fryer and Mr. Jones,

The Montana Mining Association (MMA) appreciates the opportunity to provide these scoping comments regarding the Environmental Impact Statement (EIS) for the Stillwater Mine Complex Amendment 14. MMA respectfully urges the U.S. Forest Service (USFS) and Montana Department of Environmental Quality (DEQ) to maintain an appropriately focused EIS scope centered on the direct operational effects of Amendment 14 within the agencies' jurisdiction. Sibanye Stillwater (Stillwater) recently celebrated 40 years of responsible mining operations at its Stillwater Mine and also operates the East Boulder Mine and a metallurgical facility in Columbus. Stillwater is a global leader in the production of platinum group metals (PGMs) and America's **only** primary producer of platinum and palladium—both deemed critical minerals by the USGS. The project is therefore important to strengthening domestic critical-minerals supply chains and is appropriately included on the FAST-41 permitting list¹.

¹ <https://www.permits.performance.gov/permitting-project/fast-41-transparency-projects/stillwater-mine>

The MMA is the trade association for the Treasure State's mining industry and has a mission "*to protect and promote responsible mining in Montana.*" Our nearly 200 members include producers, explorers, suppliers, service companies, and small businesses that support Montana's multi-billion-dollar mining industry. Many MMA members hold mining claims or develop critical-minerals projects on National Forest System (NFS) lands, including Stillwater's Stillwater and East Boulder operations.

The MMA submits these comments in strong support of the scoping process for this EIS. We are proud to have Stillwater in our ranks because of its longstanding reputation for responsible operations in Montana. Earlier this week, MMA included Stillwater in our annual meeting program on a panel discussion titled "Defining Responsible Mining in Montana." The Stillwater Mine has operated responsibly for over four decades, and MMA believes the current proposal is appropriately scoped, particularly in light of the U.S. Supreme Court's May 2025 decision in *Seven County Infrastructure Coalition v. Eagle County*².

In *Seven County*, the U.S. Supreme Court confirmed that NEPA does not require agencies to evaluate speculative, geographically distant, or attenuated effects outside the scope of the agency action under review. MMA urges USFS and DEQ to avoid unnecessary "scope creep" and maintain the EIS's proper focus on Amendment 14's direct operational impacts within the agencies' jurisdiction. This disciplined approach will help avoid inappropriate delays tied to remote, global, or third-party environmental consequences and allow Stillwater to continue its vital operations and responsible domestic production.

Delay would affect not only the nation's domestic supply chain for PGMs but also the economic lifeblood of rural Montana. Stillwater maintains the largest workforce in Montana's mining industry, with approximately 1,100 employees, and provides compensation well above state and national averages. Its operations in Stillwater and Sweet Grass counties generate substantial regional economic output, support thousands of direct, indirect, and induced jobs, and contribute significant state and local tax revenue. Stillwater and its employees also play an important civic role in the communities where they live and work, supporting community projects, nonprofit boards and committees, and youth sports. As noted above, Stillwater is the United States' only primary producer of PGMs, which are critical to automotive clean-air technologies and other technology and energy applications.

For these reasons, MMA respectfully urges USFS and DEQ to keep the EIS appropriately scoped, avoid expanding analysis beyond direct and jurisdictionally relevant effects, and move Amendment 14 forward on a timely permitting schedule. Doing so will preserve the economic and supply-chain benefits described above while providing an important example of focused, legally sound environmental review. MMA is confident that Stillwater will continue to demonstrate responsible operational leadership

² https://www.supremecourt.gov/opinions/24pdf/23-975_m648.pdf

while supplying critical minerals that no other domestic primary producer can presently provide at a time when the nation cannot afford unnecessary permitting delays.

Again, MMA appreciates the opportunity to submit these comments. Please do not hesitate to contact me at mvincent@montanamining.org if you have any pertinent questions.

Sincerely,

A handwritten signature in black ink, appearing to read "MV", is centered within a light gray rectangular box.

Matt Vincent,
Executive Director