MONTANA NATIVE
PLANT SOCIETY
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July 11, 2026

To:
Custer-Gallatin National Forest
Montana Department of Environmental Quality

On the behalf of the Montana Native Plant Society (MNPS), we appreciate the opportunity to comment on the proposed Stillwater Mine Expansion. MNPS is a nonprofit with approximately 1,000 members whose mission is to preserve, conserve, and study Montana's native plants and plant communities.

In reviewing the Proposed Expansion Project (Stillwater Mine Complex Amendment 14) as it relates to expansion of the East Side Waste Rock Storage Facility (ESWRSF), the relocation of the lower stretch of Nye Creek, and the expansion of the Hertzler Tailing Storage Facility (TSF), the MNPS would like to emphasize the importance of the following:

1. Proper Noxious Weed Management and Treatment
2. The Use of Native Species in all Restoration/Reclamation Activities
3. Mitigating Potential Impacts on Rare Plants

Managing for and controlling the potential spread of noxious weeds will be important during all phases of the project. Ground-disturbing activities often allow noxious weed species to establish and spread into adjacent native plant communities. Control measures and treatment of all noxious weed populations in the proposed expansion areas will be critical for preventing further spread of these species.

Native species should be used for all reclamation and reseeding activities whenever possible. Using native species is important for maintaining biodiversity and proper functioning condition of the reclaimed areas. The use of appropriate native plants for reclamation is important for maintaining healthy populations of pollinators and other wildlife.

No Montana Plant Species of Concern are currently known to occur within the project area and pre-expansion surveys for rare species were conducted. However, several species are know to occur in the vicinity of the project areas and suitable habitat may exist for a least a couple of these species, including Small Yellow Lady's-slipper (*Cypripedium parviflorum*) and Wood Lily (*Lilium philadelphicum*). Rare plant populations may have been overlooked by past surveys due to the timing of the surveys, which may not have coincided with the optimal detection window or

due to plant dormancy as a result of poor growing conditions in a given year. If rare plant species are found prior to or during expansion activities, mitigation efforts should be initiated.

MNPS recognizes and appreciates the comprehensive analysis and survey work completed as part of the project planning, including the Vegetation Baseline Surveys and Reporting, Aquatic Baseline Surveys and Reporting, and the Wetland Delineation work. We would also like to emphasize the importance of The Good Neighbor Agreement (GNA) that is in place between the Stillwater Mine and the Northern Plains Resource Council, Cottonwood Resource Council, and Stillwater Protective Association (the GNA Councils). We support and encourage the adoption of the recommendations within the GNA.

Again, thank you for the opportunity to comment on the proposed Stillwater Mine Expansion.

Dr. Robert Pal
President, Montana Native Plant Society

/s/ Ashley Mattson
Ashley Mattson
Conservation Chair, MNPS