

June 30, 2026

Mr. Matt Jedra, Supervisor
Custer Gallatin National Forest
P.O. Box 130
10 E Babcock Ave
Bozeman, MT 59771

Mr. Eric Dahlgren, Chief
MTDEQ: Mining Bureau
P.O. Box 200901
Helena, MT 59019

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

**Subject: Stillwater Mine Complex Amendment 14 Environmental Impact Statement #296522:
Unmitigated Impacts to Schools and Homeowners**

Dear Mr. Jedra and Mr. Dahlgren;

Please take into consideration the following comments and included exhibits and referenced documents in your NEPA/MEPA review of the current major amendment application (014) that extends the life of the Nye Mineral Development (00118) by up to 42 years:

1. Please complete a comprehensive cumulative analysis “hard look” at the existing and potential future **Socioeconomic Impacts** for Nye Mineral Development for the following reasons:
 - a. The previous NEPA/MEPA record does not appear to have analyzed the **impacts of Transportation Stipulations** for the Nye Mineral Development (e.g. **forced bussing**/car pooling requirement) on schools and communities in Stillwater County. This “condition of employment” may contribute to employees finding housing beyond the immediate vicinity of the mineral development.
 - b. The previous NEPA/MEPA record does not appear to have analyzed the **impacts of Mine Sponsored Housing Restrictions** for the Nye Mineral Development on schools and communities in Stillwater County. This stipulation may limit Sibanye’s ability to provide additional employee housing near the mineral development. This stipulation may force employees to find housing beyond the immediate vicinity of the mineral development.
 - c. The previous NEPA/MEPA record appears to have used a low **count of Mine Development Employees for analysis of impacts** on schools and communities in Stillwater County. The previous NEPA/MEPA record contemplated a maximum of 700 Nye Mineral Development Employees (including contractors at Nye); while the actual

employee numbers just at Nye have been over 1,700 employees (including contractors). *(see Exhibit 5, pdf page 415 of 505)*

- d. Much of the past socioeconomic analysis in NEPA/MEPA and in the 1998 Nye Impact Plan is extremely outdated. Tax values, average home values (\$70,000 in the plan), school populations, and inflation are all now very inaccurate in the approved plan. *(see Exhibit 5, pdf pages 34-149).*
 - e. The previous NEPA/MEPA record does not appear to have analyzed the **(1) tax base amount, (2) tax base per student, or (3) tax base type (% of industrial, commercial, residential) of individual/separate Stillwater County school districts.** This is important to understanding how taxpayers and students in different school districts could be impacted and important to understanding how tax revenue disparities could be also mitigated through the **Property Tax Base Sharing Act (MCA 90-6-401).** *(for example, see Exhibit 1).*
2. Please compare the current EIS socioeconomic analysis to the assumptions and predictions of the last approved Hard Rock Mining Impact Plan (AM2 1998) for the Nye Mineral Development *(see Exhibit 5, pdf pages 34-149).*
 3. Please carefully listen to all of the audio (public record) from both the September 24, 2021 and the November 30, 2023 Mine Impact Board Meetings. These 2 public meetings provide corroborating evidence to the validity of Park City's concerns. *(see Exhibits 18 & 21)... or go to the following links to access the audio.*
https://commerce.mt.gov/_shared/comdev/HRMI/docs/Board/Meetings/2023-Biennium/HRMI-202109-Audio.mp3
https://commerce.mt.gov/_shared/comdev/HRMI/docs/Board/Meetings/2025-Biennium/HRMI-202311-Audio.mp3
 4. Please also take into consideration the additional comments, documentation and supporting evidence in the **22 Exhibits** included with this EIS Public Comment submittal in your NEPA/MEPA review of the current major amendment application that extends the life of the Nye Mineral Development up to 42 years.

Attached to and included in this 2026 EIS public comments submittal:

EXHIBIT 1_2025 Stillwater County School District Comparison_20260626_**1 page**.pdf

EXHIBIT 2_Chart of Actual School Populations vs Nye Mineral Development Employees 1994-2023_**1 page**.pdf

EXHIBIT 3_PCSD_Letter to Commissioners & MIB_Requesting Mitigation of Impacts_20210312_**2 pages**.pdf

EXHIBIT 4_Sibanye Email to Park City School Superintendent Confirming Mine Employee and Mine Student Populations 2018 thru 2021_20221107_**2 pages**.pdf

EXHIBIT 5 _PCSD Submits Draft Nye Impact Plan Amend after Commissioners and MIB Refuse to Respond to 2021 Letter for 2 years_20230302_505 pages.pdf

EXHIBIT 6 _Citizen Complaint to DEQ_Sibanye Nye Impact Plan in Violation of HRMRA_After 2 years of No Response from Commissioners or MIB to 2021 Letter_20230823_512 pages.pdf

EXHIBIT 7 _MDEQ Response to Citizen Complaint 00118_20230915_2 pages.pdf

EXHIBIT 8 _PCSD Request MIB Require an Amend to Nye Impact Plan After 2.5 years of No Response from Commissioners or MIB to 2021 Letter_20231011_5 pages.pdf

EXHIBIT 9 _Sibanye & Stillwater Commissioners Finally Respond After 2.5 years with Joint Letter Publicly Opposing Mitigating PCSD Impacts_20231024_9 pages.pdf

EXHIBIT 10 _D Weber Public Comments Nov 30 2023 Mine Impact Board Mtg_20231130_No Response from MIB_18 pages.pdf

EXHIBIT 11 _D Weber Letter Requesting MIB look at Nye Impact Plan Compliance_MIB Later Voted They do Not Have to Respond to the Questions_20240217_10 pages.pdf

EXHIBIT 12 _Stillwater Commissioners_higher a biased proponent of the Mine and County to supposedly Write a Third Party Assessment on Park City School's Draft Amend Request_20240530_65 pages.pdf

EXHIBIT 13 _Letter to MIB documenting JBeau Biased & Non Third Party Assessment of Nye Impact Plan_20240819_60 pages.pdf

EXHIBIT 14 _Example of a Stillwater County School Compromise Agreement Sent to Commissioners, School Districts & Sibanye_20251027_12 pages.pdf

EXHIBIT 15 _SchoolDistricts_HSK12_Stillwater_1 page.pdf

EXHIBIT 16 _SchoolDistricts_ELK12_Stillwater_1 page.pdf

EXHIBIT 17 _Hard Rock Mining Impact Board Public Mtg_Sept 24 2021 Binder_14 pages.pdf

EXHIBIT 18 _Hard Rock Mining Impact Board Public Mtg_Sept 24 2021_Audio_2hrs5min44sec.mp3

EXHIBIT 19 _Hard Rock Mining Impact Board Public Mtg_Sept 24 2021_Minutes_2 pages.pdf

EXHIBIT 20 _Hard Rock Mining Impact Board Public Mtg_Nov 30 2023_Binder_38 pages.pdf

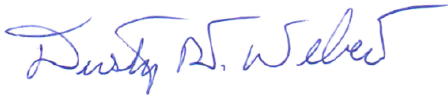
EXHIBIT 21 _Hard Rock Mining Impact Board Public Mtg_Nov 30 2023_Audio_1hr27min40sec.mp3

EXHIBIT 22 _Hard Rock Mining Impact Board Public Mtg_Nov 30 2023_Minutes_2 pages.pdf

The information provided in this submittal documents that cumulative impacts, including potential future impacts to all schools in Stillwater County is a substantial concern for Park City homeowners and Park City School District.

Thank you for your time and consideration. Please contact me if you have any questions.

Sincerely,



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7 Pinto Place
Park City, MT
59063

1 Cover Letter and 22 Separate Exhibits uploaded to:
<https://cara.fs2c.usda.gov/Public/CommentInput?Project=296522>