Impact Statement

The socioeconomic analysis for this Environmental Impact Statement (EIS) needs to reflect what is happening today—not what was happening in 1998. The current Nye Mineral Development Impact Plan is based on assumptions that are almost 30 years old, including average home values of around $70,000, a mine workforce expected to peak at about 700 employees, and community conditions that no longer exist. Using those outdated numbers to evaluate a 42-year permit extension simply won't show the real impacts Park City School District No. 5 and our taxpayers are experiencing.

The mine has grown far beyond what was originally planned. At times, the workforce has exceeded 1,700 employees, placing much greater demands on our schools, roads, and public services than anyone anticipated. Park City School District has dealt with these impacts for years but has never received a fair share of the mitigation available through the current impact plan.

The EIS should also take a close look at how property tax revenue from the mine is shared. Montana law provides a way to distribute those tax dollars more fairly among affected school districts, yet Park City continues to carry the costs without receiving an equitable share of the benefits. This puts more pressure on local taxpayers and makes it harder for the district to fund needed school improvements.

Housing is another issue that deserves attention. Mine housing policies and workforce transportation decisions have pushed more workers and families into surrounding communities like Park City. That affects housing prices, school enrollment, traffic, and local infrastructure. These aren't just normal market trends—they're connected to decisions made by the mining operation and should be evaluated as part of the EIS.

The analysis also needs to recognize how changes in mine employment affect student enrollment. When the mine expands, schools must quickly accommodate more students, hire additional staff, and provide more transportation. When employment drops, enrollment falls, creating financial challenges under Montana's school funding system. These are real, documented impacts that can be measured using historical enrollment and employment data.

Another concern is the different standard that's being applied today. In 1998, neighboring jurisdictions were recognized as "affected" based largely on projected impacts. Now, Park City School District is being asked to meet a much higher standard, even after decades of documented impacts. That isn't a fair or consistent approach.

There is already plenty of information in the public record supporting these concerns, including discussions during the September 24, 2021, and November 30, 2023, Mine Impact Board meetings. Those records show that Park City's exclusion from mitigation isn't because impacts don't exist—it's because the current system has failed to keep up with reality.

NEPA and MEPA require agencies to fully evaluate the cumulative socioeconomic impacts of major federal actions. Relying on outdated assumptions from 1998 to justify a permit extension that could last another 42 years doesn't meet that responsibility.

The Final EIS should recognize that the existing Nye Mineral Development Impact Plan no longer reflects current conditions. It should recommend updating the plan to officially recognize Park City School District No. 5 as an affected local government so it can receive a fair share of property tax revenue and other mitigation needed to address the long-term impacts of mining on our community.