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Comments: I am writing in support of a comprehensive socioeconomic analysis as part of the Stillwater Mine Complex Amendment 014 Environmental Impact Statement.

I strongly encourage the Custer Gallatin National Forest and the Montana Department of Environmental Quality to take a thorough, evidence-based review of the cumulative impacts this proposed 42-year permit extension will have on surrounding communities, particularly Park City School District No. 5.

The socioeconomic assumptions used in the original 1998 impact plan are no longer representative of current conditions. Property values, population growth, infrastructure costs, transportation expenses, and educational costs have changed dramatically over the past three decades. Continuing to rely on outdated baselines would fail to accurately evaluate the true impacts of this proposed permit extension.

I ask that the EIS specifically examine the relationship between the mine's actual workforce levels and the demands placed on Park City School District No. 5. The original planning assumptions anticipated a substantially smaller workforce than has existed for much of the mine's operation. If mine-related growth has resulted in increased enrollment, transportation requirements, and operational costs for the district, those impacts deserve to be fully analyzed and documented.

The EIS should also evaluate whether the current distribution of mine-related tax revenues and mitigation funding equitably reflects the communities that are providing educational and public services to mine employees and their families. If Park City School District No. 5 has experienced measurable impacts without receiving proportional mitigation, that issue should be addressed as part of the cumulative socioeconomic analysis.

I further request that the agencies review the historical administrative record, including previous Mine Impact Board proceedings and related documentation, to better understand the district's longstanding efforts to address these concerns. Those records may provide important context regarding the adequacy of the existing mitigation framework.

As lead agencies under NEPA and MEPA, I respectfully request that you take the required "hard look" at the cumulative socioeconomic impacts of this proposal. A permit extension of this magnitude should be supported by current data, contemporary economic conditions, and a thorough evaluation of whether existing mitigation measures remain adequate after nearly three decades of changing circumstances.

If the analysis demonstrates that Park City School District No. 5 has experienced significant mine-related impacts that are not addressed under the current impact plan, I encourage the agencies to recommend appropriate amendments to ensure that future mitigation and tax-sharing arrangements are fair, equitable, and based on present-day conditions rather than outdated assumptions.

Thank you for considering these comments and for ensuring that the Environmental Impact Statement provides a complete and objective evaluation of the long-term socioeconomic impacts of this proposal.