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Comments: Park city school should be included in still water mine payments toward schools. We encompass a large deal of mine workers with their children going to our school.

Things that need to be considered

1. The last tax evaluation was done in 1998 and is outdated. The estimated value of homes was 70,000. A new evaluation should be done with accurate to the times to better help the tax payers of of park city.
2. The increase in work force that the mine has had has placed a strain on park city schools with buses and facilities without matching any funding.
3. We need property based tax base sharing. The mines tax base should be equally shared between schools in still water county and a new assessment to meet those needs should to be done to help stabilize the burden on tax payers and the school.
4. The EIS must study how mine-sponsored housing caps and forced busing requirements systematically push workforce housing demands into outlying communities like Park City.
5. The EIS must accurately analyze the 'in-migration' of mineral development students versus the volatility of 'out-migration' during mine downturns. The district's budget is uniquely vulnerable to these fluctuations, and the analysis must account for the real, documented correlation.

6. Need to assess the Inequitable

Regulatory Burdens: The 1998

Impact Plan granted "affected status" to neighboring districts based entirely on theoretical projections and estimates rather than hard historical data. Park City is currently being held to a punitive evidentiary standard that was never applied to these other districts. The EIS must recognize this discrepancy as an unfair exclusionary tactic and should not use it to justify our continued omission. I Demand Administrative Record Review: The EIS process must include a comprehensive review of the public record regarding PCSD's repeated attempts to secure mitigation, specifically the audio and transcripts from the September 24, 2021, and November 30, 2023, Mine Impact Board meetings. These records provide irrefutable evidence that our district's exclusion is not a lack of 'impact, but a historical failure of the existing mitigation framework.

7. Enforce 'Hard Look'

Requirement: "As lead agencies, you are legally mandated to perform a 'hard look' at cumulative socioeconomic impacts under NEPA and MEPA. Approving a

42-year permit extension while relying on obsolete socioeconomic baselines. Approving a

42-year permit extension while relying on obsolete socioeconomic baselines from 1998 would be an arbitrary and capricious decision that fails to meet these statutory obligations.

8. We request that the resulting Final EIS include a specific directive requiring an amendment to the Nye Mineral Development Impact Plan. The socioeconomic analysis must conclude that the current plan is inadequate and must be updated to formally designate Park City School District No. 5 as an 'affected local government unit' eligible for tax-sharing allocations.