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Comments: The Draft Environmental Impact Statement (DEIS) fails to provide the proper updated rigorous socioeconomic analysis required under NEPA and MEPA. This study is relying on outdated assumptions, omits documented cumulative impacts, and perpetuates inequitable mitigation policies that have disadvantaged Park City School District No. 5 for decades.

Most notably, the analysis continues to rely on the framework established in the 1998 Mineral Development Impact Plan, despite substantial changes in economic conditions, property values, mine employment, and regional population dynamics. Baseline assumptions-including home values of approximately \$70,000 and a projected maximum mine workforce of 700 employees-no longer reflect present-day realities. Mine employment has at times exceeded 1,700 workers, producing socioeconomic impacts far beyond those contemplated in the original analysis. These changes have resulted in sustained demands on Park City School District facilities, transportation systems, and local taxpayers that have never been adequately evaluated or mitigated.

The DEIS also fails to analyze the structural inequities within the existing tax mitigation framework. Although Montana law provides mechanisms to address impacts on affected local governments, the analysis does not evaluate whether the mine's property tax base is being equitably distributed among impacted school districts or whether Park City School District No. 5 should receive affected-local-government status. Without this evaluation, the socioeconomic analysis is incomplete and cannot accurately assess long-term fiscal impacts on local residents.

Additionally, the DEIS does not adequately examine how mine-related housing policies, workforce housing limitations, and transportation practices influence residential settlement patterns. By encouraging workers to reside in surrounding communities while commuting to the mine, these policies have shifted housing demand, school enrollment, and public service burdens onto communities such as Park City. These indirect but foreseeable impacts are integral components of the cumulative socioeconomic effects that must be analyzed.

The discussion of population change is similarly deficient because it does not meaningfully evaluate the demonstrated relationship between mine employment levels and student enrollment. Park City School District experiences both growth during periods of mine expansion and significant fiscal challenges during workforce reductions. These enrollment fluctuations directly affect staffing, transportation, budgeting, and bonding capacity, yet the DEIS treats these impacts as speculative rather than analyzing the documented historical relationship.

The administrative history also demonstrates that Park City School District has repeatedly sought recognition and mitigation through the Mine Impact Board process. The public record-including proceedings from September 24, 2021, and November 30, 2023-documents longstanding efforts to address these impacts. The DEIS should review and incorporate this record because it provides relevant evidence regarding the effectiveness of the existing mitigation framework and the district's claims of impact.

Furthermore, the evidentiary standard currently being applied to Park City differs from the standard applied during adoption of the original impact plan. Neighboring districts received affected status based largely on projected impacts, while Park City is now required to satisfy a substantially higher burden despite decades of documented experience. The DEIS should evaluate whether this inconsistency has contributed to inequitable mitigation outcomes.

Taken together, these deficiencies prevent the agencies from taking the legally required "hard look" at cumulative socioeconomic impacts associated with the proposed 42-year permit extension. An analysis that relies on

obsolete baseline assumptions while disregarding documented changes in workforce size, housing patterns, property values, school enrollment, and public finance does not provide an adequate foundation for informed decision-making.

Accordingly, the Final EIS should update its socioeconomic baseline using current economic and demographic data, comprehensively evaluate cumulative impacts on Park City School District No. 5, review the relevant administrative record, analyze the adequacy of the existing Mineral Development Impact Plan, and consider whether amendments-including recognition of Park City School District No. 5 as an affected local government unit eligible for appropriate mitigation-are warranted based on the evidence developed during the environmental review process.

The Park City schools deserve to be adequately funded by those using our school. If the Stillwater Mine and our local government does not want to share in the revenues maybe the mine should provide a company school for their employees children.