Data Submitted (UTC 11): 7/16/2026 12:57:14 AM
First name: Dayle
Last name: Stahl
Organization:
Title:
Comments: I respectfully request that the Custer Gallatin National Forest and the Montana Department of Environmental Quality fully evaluate the cumulative socioeconomic impacts of the proposed 42-year Stillwater Mine permit extension on Park City School District No. 5 as required under NEPA and MEPA.

The Environmental Impact Statement should not rely on the outdated 1998 socioeconomic baseline. That analysis was based on assumptions that no longer reflect current conditions, including home values of approximately $70,000 and a projected mine workforce of only 700 employees. Since then, property values have increased dramatically, and the mine workforce has at times exceeded 1,700 employees. These changes have significantly increased demands on Park City School District's educational facilities, transportation system, and local taxpayers.

For decades, Park City School District has educated children from mine-related families while local property owners have borne the associated educational and transportation costs. The EIS should evaluate whether the current mitigation framework accurately reflects these documented impacts and whether it provides equitable treatment compared with neighboring school districts that receive tax-sharing revenues and metal mine trust funds.

The cumulative impacts are visible throughout our district. Our school facilities are in significant disrepair after years of limited financial capacity, and our district is preparing to compete at the Class B level in athletics beginning next school year. That transition brings additional demands for facilities, transportation, and educational resources. It is increasingly difficult for our community to support the expectations that come with serving a growing student population and competing at a higher classification while relying almost entirely on local taxpayers to fund aging buildings and infrastructure. These conditions should be evaluated as part of the cumulative socioeconomic impacts associated with long-term mineral development.

The agencies should also examine how workforce housing patterns, housing policies, and transportation requirements associated with the mine influence where employees and their families live, and how those decisions affect enrollment, school transportation, and infrastructure demands within Park City School District. In addition, the analysis should consider the documented relationship between mine employment levels and school enrollment, including the fiscal impacts of both workforce growth and future workforce reductions.

I also request that the agencies review the administrative record, including the September 24, 2021, and November 30, 2023, Mine Impact Board meeting records, to fully understand the district's previous efforts to obtain mitigation and the historical context surrounding its exclusion from existing agreements.

Finally, I ask the lead agencies to take the legally required "hard look" at these cumulative socioeconomic impacts. If the analysis demonstrates that Park City School District has experienced substantial impacts from mineral development without corresponding mitigation, the Final EIS should recommend amending the Nye Mineral Development Impact Plan to evaluate whether Park City School District No. 5 should be recognized as an affected local government unit eligible for appropriate tax-sharing mitigation. A permit extension of this length should not move forward without ensuring that the long-term impacts on local schools and taxpayers are fully analyzed and addressed through an updated mitigation framework.