Data Submitted (UTC 11): 7/16/2026 1:03:01 AM
First name: Jessica
Last name: Gage
Organization:
Title:
Comments: To the Lead Agencies:
My family has called Park City home for years. My spouse teaches in Park City School District No. 5, and our two children attend school here. We are writing not as outside observers, but as a family that lives daily with the consequences of a mitigation framework that has failed to keep pace with reality.
The Baseline Is Obsolete
The socioeconomic analysis underpinning this plan still relies on a 1998 baseline that valued local homes at just $70,000. That number bears no resemblance to today's property values or the inflationary pressure our neighbors and I face as taxpayers. Our modest 3 bedroom, 2 bath home cost just shy of $500k a mere 2 years ago. Any credible EIS must be grounded in current economic conditions, not assumptions nearly three decades out of date.
The Workforce Has Grown - Our Support Hasn't
The original plan capped the mine's workforce at 700 employees. In practice, that workforce has exceeded 1,700 at times. My children's school, and the buses that carry them there, have absorbed the cumulative strain of that growth for decades without any matching increase in tax mitigation. This is not a hypothetical burden - it is one my family and our teachers navigate every day.
Tax Base Sharing Is Both Necessary and Legally Grounded
Under MCA 90-6-401, the EIS must examine the structural tax base of individual school districts and require that the mine's property tax base be equitably shared with Park City. Doing so would stabilize our school's bonding capacity and ease the burden currently carried by local homeowners like us.
Housing and Busing Policies Deserve Scrutiny
The EIS must also study how mine-sponsored housing caps and forced busing requirements push workforce housing demand into communities like ours. Park City is absorbing growth it did not create and has not been compensated for.
Migration Patterns Are Documented, Not Speculative
The district's budget is uniquely exposed to the in-migration of mineral development families and the volatility of out-migration during mine downturns. This is a real, documented correlation between mine staffing and school enrollment - not an unproven variable, as prior analyses have treated it.
The Regulatory Standard Has Been Unequal
Neighboring districts were granted "affected status" in the 1998 Impact Plan based on theoretical projections, not hard historical data. Park City is now being held to a far more punitive evidentiary standard that was never applied to those districts. This discrepancy should not be used to justify our continued exclusion - it should be recognized as the unfair exclusionary tactic it is.
The Record Already Proves Our Case
We ask that the EIS process include a full review of the administrative record, particularly the audio and transcripts from the September 24, 2021, and November 30, 2023, Mine Impact Board meetings. These records document our district's repeated, good-faith attempts to secure mitigation. They are irrefutable evidence that our exclusion reflects a failure of the existing framework - not an absence of impact.
A 'Hard Look' Is a Legal Obligation, Not an Option
As lead agencies, you are required under NEPA and MEPA to take a "hard look" at cumulative socioeconomic impacts. Approving a 42-year permit extension on the basis of a 1998 baseline would be arbitrary and capricious, and it would fail the statutory obligations owed to communities like ours.
Our Request
We respectfully request that the Final EIS include a specific directive requiring amendment of the Nye Mineral Development Impact Plan. The socioeconomic analysis must conclude that the current plan is inadequate and must formally designate Park City School District No. 5 as an "affected local government unit" eligible for tax-sharing allocations.

My children deserve a school system that is funded in proportion to the impact it absorbs. My spouse, as a teacher, deserves a classroom that isn't stretched thin by growth no one accounted for. And our community deserves a process that finally looks at the facts as they are today - not as they were in 1998.

Respectfully submitted,

A Park City Resident, Parent, and School District Family