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First name: Jenna
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Comments: To Whom It May Concern,

I am writing to request that the socioeconomic analysis for the proposed 42-year expansion of the Nye Mine fully and accurately evaluate the long-term impacts on Park City School District No. 5 and the taxpayers who have carried an unfair financial burden for nearly three decades.

For almost 30 years, Park City taxpayers have paid 100 percent of the educational, operational, and transportation costs associated with students from mine-related families relocating into our district. During that same period, neighboring school districts have received millions of dollars through tax-sharing agreements and metal mine trust funds specifically intended to offset the impacts of mineral development. Park City School District No. 5, despite educating as much as 15 percent of the mine's student population within Stillwater County, has received none of these mitigation funds.

If this 42-year permit extension is approved without correcting these outdated and inequitable agreements, local property owners will continue subsidizing industrial growth for another half century. This is neither equitable nor consistent with the purpose of Montana's impact mitigation laws.

The Environmental Impact Statement (EIS) should address the following issues:

Reject Obsolete Socioeconomic Baselines

The socioeconomic analysis must not rely on the 1998 Impact Plan as its foundation. That plan was based on assumptions that no longer reflect present-day conditions, including an average local home value of approximately $70,000. Current property values, inflation, and the increasing tax burden placed on Park City homeowners require a modern analysis based on today's economic realities rather than outdated data nearly three decades old.

Recognize the True Workforce Impacts

The original impact analysis anticipated a maximum mine workforce of approximately 700 employees. In reality, the mine workforce has, at times, exceeded 1,700 employees. This dramatic increase has created decades of cumulative impacts on Park City School District facilities, staffing, transportation routes, and operating budgets without any corresponding adjustment in mitigation funding. The EIS must evaluate these actual historical impacts rather than relying on projections that proved inaccurate.

Require Equitable Property Tax Base Sharing

Pursuant to MCA 90-6-401, the EIS should evaluate the structural property tax base available to each affected school district and determine whether the mine's taxable value should be equitably shared with Park City School District No. 5. Such an evaluation is essential to strengthen the district's bonding capacity, stabilize long-term educational funding, and reduce the disproportionate burden currently placed on local property taxpayers.

Evaluate Housing and Transportation Policies

The analysis should examine how mine-sponsored housing limitations and transportation practices have influenced residential settlement patterns. Workforce housing pressures have increasingly shifted families into

surrounding communities such as Park City, while the educational and transportation costs associated with those families remain concentrated within our district. These indirect impacts deserve comprehensive evaluation.

Analyze In-Migration and Out-Migration Effects

The EIS must accurately assess both the influx of students associated with periods of mine expansion and the enrollment volatility experienced during workforce reductions. Park City School District's budget is especially vulnerable to these fluctuations because staffing, transportation, and educational services cannot be adjusted as quickly as enrollment changes occur. Historical data demonstrate a direct relationship between mine employment levels and district enrollment. These impacts should be analyzed as documented realities rather than speculative variables.

Correct Unequal Regulatory Standards

The 1998 Impact Plan designated neighboring school districts as affected local government units based largely upon projected impacts rather than extensive historical documentation. Today, Park City is being held to a significantly higher evidentiary standard despite decades of documented impacts. This inconsistent application of regulatory standards has resulted in the continued exclusion of Park City from mitigation funding. The EIS should recognize this inequity and ensure that Park City's eligibility is evaluated under a fair and consistent standard.

Review the Administrative Record

The socioeconomic analysis should include a comprehensive review of the public record documenting Park City School District's repeated efforts to obtain equitable mitigation. Specifically, the administrative record should include the audio recordings and transcripts from the Mine Impact Board meetings held on September 24, 2021, and November 30, 2023. These proceedings clearly demonstrate that Park City's exclusion is not the result of a lack of measurable impact, but rather a longstanding deficiency in the current mitigation framework.

Fulfill the "Hard Look" Requirement

Under both the National Environmental Policy Act (NEPA) and the Montana Environmental Policy Act (MEPA), the lead agencies are required to take a thorough and objective "hard look" at cumulative socioeconomic impacts. Approving a 42-year permit extension while relying on socioeconomic assumptions developed in 1998 would fail to satisfy this obligation. Such a decision would ignore decades of documented changes in workforce size, student enrollment, property values, and taxpayer impacts, making the analysis incomplete and legally vulnerable.

Require Amendment of the Nye Mineral Development Impact Plan

Finally, the Final Environmental Impact Statement should include a clear recommendation that the Nye Mineral Development Impact Plan be amended. The current plan no longer reflects existing conditions and fails to provide equitable mitigation to all affected communities. The updated plan should formally designate Park City School District No. 5 as an affected local government unit eligible to receive appropriate tax-sharing revenues and other mitigation funding consistent with the actual impacts experienced over the past three decades.

The purpose of environmental review is not simply to document impacts but to ensure they are fairly mitigated. Park City taxpayers have subsidized mine-related educational costs for nearly 30 years while neighboring districts have benefited from mitigation specifically designed to address these same impacts. This disparity should not be perpetuated through another 42 years of mine operation.

I respectfully request that the agencies responsible for preparing the Environmental Impact Statement fully

address these issues, incorporate current data and documented historical evidence into the socioeconomic analysis, and recommend the necessary amendments to ensure that Park City School District No. 5 receives equitable consideration under Montana law.

Thank you for your time and consideration.

Respectfully,
Jenna Rentmeister
Park City Resident