Data Submitted (UTC 11): 7/16/2026 2:56:01 AM
First name: Breann
Last name: Streck
Organization:
Title:
Comments: **Public Scoping Comment - Amendment 14 EIS
Submitted by a Long-Time Resident and Former Trustee, Park City School District #5**

I am a long-time resident of Park City, Montana, and a former trustee of Park City School District #5 (PCSD #5), where I served for six years. During that time, I worked extensively on the mine amendment process and repeatedly engaged with county officials regarding the triggers for reopening the Nye Mineral Development Impact Plan. Despite clear evidence that those triggers have been met, Park City has been stonewalled at the county level for years. With Amendment 14 proposing a 42-year permit extension, the time to correct these longstanding inequities is now.

As lead agencies, the Custer Gallatin National Forest and the Montana Department of Environmental Quality are legally obligated under NEPA and MEPA to conduct a full "hard look" at cumulative socioeconomic impacts. Park City School District #5 is one of the communities most directly affected by Stillwater Mine's workforce, yet it remains excluded from the mitigation framework - an exclusion that is both historically unjustified and economically unsustainable.

Challenge Obsolete Baselines
The socioeconomic analysis must reject the outdated 1998 baseline plan, which estimated local impacts using a home valuation of **$70,000**. This figure bears no resemblance to modern property values or the inflationary pressures facing Park City taxpayers. Continuing to rely on this obsolete baseline would be arbitrary and capricious under NEPA/MEPA.

Expose Workforce Gaps
The original impact plan assumed a maximum mine workforce of **700 employees**. In reality, workforce levels have reached **1,700**, more than double the projected impact. For nearly 30 years, Park City taxpayers have absorbed 100% of the educational, operational, and transportation costs associated with mine-related families - at times representing up to **15% of the mine's student footprint in Stillwater County**. These cumulative impacts must be fully analyzed.

Demand Property Tax Base Sharing (MCA 90-6-401)
Neighboring districts receive millions in tax-sharing revenues and metal mine trust funds. Park City receives **0%**, despite serving a significant portion of mine-related students. The EIS must analyze the structural tax base of individual school districts and evaluate how equitable tax-base sharing - as authorized under MCA 90-6-401 - could stabilize bonding capacity and relieve local homeowners.

Evaluate Busing & Housing Policies
Mine-sponsored housing caps and forced busing requirements have pushed workforce housing demand into outlying communities like Park City. The EIS must examine how these policies create secondary socioeconomic impacts, including increased transportation costs, enrollment volatility, and strain on school facilities.

Address In-Migration vs. Out-Migration Impacts
PCSD #5 experiences direct enrollment fluctuations tied to mine staffing levels. The EIS must analyze the documented correlation between workforce in-migration and student enrollment, as well as the destabilizing effects of out-migration during mine downturns. Treating these patterns as speculative or unproven would be inconsistent with decades of observed data.

Challenge Inequitable Regulatory Burdens
The 1998 Impact Plan granted "affected status" to neighboring districts based on theoretical projections rather than historical evidence. Park City is now being held to a punitive evidentiary standard that was never applied to those districts. The EIS must acknowledge this discrepancy and ensure it is not used to justify Park City's continued exclusion.

Demand Administrative Record Review
The EIS must include a review of the public record documenting PCSD #5'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 clearly show that Park City's exclusion is not due to a lack of impact, but due to systemic failures in the existing mitigation framework.

Enforce the "Hard Look" Requirement
Approving a 42-year permit extension while relying on obsolete socioeconomic baselines from 1998 would fail NEPA/MEPA's "hard look" standard. The agencies must evaluate modern conditions, modern costs, and modern impacts - not outdated assumptions from nearly three decades ago.

Require a Specific Impact Plan Amendment
I request that the Final EIS include a directive requiring an amendment to 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 #5 as an "affected local government unit"** eligible for tax-sharing allocations.

Conclusion
Park City residents have carried these costs alone for nearly 30 years. If Amendment 14 is approved without updating the impact plan, our community will be forced to subsidize industrial growth for another half-century. This is precisely the type of cumulative socioeconomic impact NEPA and MEPA were designed to address.

I urge the agencies to correct this longstanding inequity and ensure that Park City School District #5 is finally recognized and mitigated as an affected community.