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Comments: I am a long-time Park City resident, and my family has been directly affected by the Stillwater Mine's workforce impacts on Park City School District #5 (PCSD #5). As agencies evaluate Amendment 14's proposed 42-year permit extension, it is essential that the EIS fully analyze the cumulative socioeconomic impacts on our community.

For nearly three decades, Park City taxpayers have carried 100% of the educational and transportation costs for mine-related families, despite educating up to 15% of the mine's student footprint in Stillwater County. Neighboring districts receive millions in tax-sharing revenues and metal mine trust funds. Park City receives none.

Key points for required analysis:

Reject obsolete baselines: The 1998 socioeconomic plan used a $70,000 home value and a projected workforce of 700. Actual workforce levels have reached 1,700, and modern property values make the old baseline unusable for today's impacts.

Analyze tax-base equity: Under MCA 90-6-401, the EIS must evaluate how sharing the mine's property tax base with Park City could stabilize bonding capacity and relieve homeowners who have subsidized mine-related growth for decades.

Evaluate housing and busing policies: Mine-sponsored housing caps and forced busing have pushed workforce housing into Park City, increasing transportation burdens and enrollment volatility.

Account for in-migration and out-migration: PCSD #5's enrollment rises and falls directly with mine staffing levels. The EIS must analyze this documented correlation rather than treating it as speculative.

Correct inequitable regulatory treatment: Neighboring districts were granted "affected status" based on projections, while Park City is now held to a higher evidentiary standard. The EIS must acknowledge this discrepancy.

Review the administrative record: Audio and transcripts from the Sept. 24, 2021, and Nov. 30, 2023 Mine Impact Board meetings show Park City's exclusion stems from failures in the mitigation framework-not a lack of impact.

Meet NEPA/MEPA's "hard look" requirement: Approving a 42-year extension using outdated 1998 assumptions would be arbitrary and capricious.

Requested outcome:
The Final EIS should include a directive requiring an amendment to the Nye Mineral Development Impact Plan and formally designate Park City School District #5 as an affected local government unit eligible for tax-sharing allocations.

Park City cannot continue subsidizing industrial growth for another half-century. These impacts must finally be addressed.