Data Submitted (UTC 11): 7/16/2026 3:16:32 AM
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Title:
Comments: Custer Gallatin National Forest and Montana Department of Environmental Quality (Mining Bureau),

Thank you for the opportunity to comment on the Environmental Impact Statement for the proposed mine permit extension.

I ask that the socioeconomic analysis reflect current conditions instead of relying on outdated assumptions from the 1998 Impact Plan. That plan estimated local impacts using home values of about $70,000. Property values, housing costs, and the financial pressures on Park City taxpayers have changed dramatically since then. The analysis should use current data to accurately measure today's impacts.

The analysis should also recognize that the mine has operated well beyond the workforce levels originally anticipated. While the original plan assumed a maximum workforce of 700 employees, the workforce has at times exceeded 1,700. This growth has placed significant long-term demands on Park City School District No. 5, including increased enrollment, transportation costs, and bus route demands, without corresponding mitigation through the existing tax structure.

The EIS should also study how company housing policies and employee transportation practices influence where mine workers live. If workforce housing is limited near the mine, housing demand is shifted into surrounding communities such as Park City, creating additional pressure on schools, housing, and local infrastructure. My husband and I moved to Park City when he was employed by the mine. We choose Park City because it was on the bus route.

School enrollment in Park City has closely followed changes in mine employment over time. When mine staffing increases, student enrollment increases. When employment declines, enrollment also declines, creating financial instability for the school district. These documented patterns should be treated as measurable impacts, not dismissed as speculation.

I am also concerned that Park City School District is being held to a much higher standard than other communities were when the original Impact Plan was approved. In 1998, several districts received "affected" status based largely on projected impacts rather than decades of documented experience. Park City now has years of historical evidence demonstrating mine-related impacts and should not be excluded because of an inconsistent standard.

Please include a review of the administrative record, including the Mine Impact Board meetings held on September 24, 2021, and November 30, 2023. The meeting transcripts and recordings document Park City School District's repeated efforts to obtain mitigation and demonstrate that the district's exclusion reflects shortcomings in the current mitigation framework, not a lack of impacts.

As the lead agencies under NEPA and MEPA, you have a responsibility to take a thorough, evidence-based look at the cumulative socioeconomic impacts of extending this mine permit for another 42 years. Relying on outdated socioeconomic assumptions from 1998 would not provide the complete analysis needed for informed decision-making.

Finally, I respectfully request that the Final EIS recommend an amendment to the Nye Mineral Development Impact Plan to formally designate Park City School District No. 5 as an affected local government unit eligible for property tax base sharing and other appropriate mitigation. Updating the Impact Plan is necessary to ensure that

the communities bearing the long-term impacts of mineral development receive fair consideration and equitable support.

Thank you for your consideration of these comments.