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Comments: Custer Gallatin National Forest

Montana Department of Environmental Quality (Mining Bureau

Please address the concerns and issues below:

1) Challenge Obsolete Baselines: "The socioeconomic analysis must reject the 1998 baseline plan, which estimated local impacts using an outdated local home value of $70,000. It must reflect modern property valuations and inflationary strains on Park City taxpayers."

2) Expose Workforce Gaps: "The original plan assumed a maximum mine workforce of 700. In reality, the mine's workforce has at times topped 1,700. This unmitigated expansion has placed decades of cumulative strain on PCSD #5 facilities and bus routes without matching tax mitigation."

3) Demand Property Tax Base Sharing (MCA 90-6-401): "The EIS must analyze the structural tax base of individual school districts and require the mine's property tax base to be equitably shared with Park City to stabilize school bonding capacity and relieve local homeowners."

4) Evaluate Busing & Housing Policies: "The EIS must study how mine-sponsored housing caps and forced busing requirements systematically push workforce housing demands into outlying communities like Park City."

5) Address In-Migration vs. Out-Migration Impacts: "The EIS must accurately analyze the 'in-migration' of mineral development students versus the volatility of 'out-migration' during mine downturns. The district's budget is uniquely vulnerable to these fluctuations, and the analysis must account for the real, documented correlation between mine staffing levels and school enrollment, rather than treating migration as an unproven variable."

6) Challenge Inequitable Regulatory Burdens: The 1998 Impact Plan granted "affected status" to neighboring districts based entirely on theoretical projections and estimates rather than hard historical data. Park City is currently being held to a punitive evidentiary standard that was never applied to these other districts. The EIS must recognize this discrepancy as an unfair exclusionary tactic and should not use it to justify our continued omission.

7) Demand Administrative Record Review: "The EIS process must include a comprehensive review of the public record regarding PCSD'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 provide irrefutable evidence that our district's exclusion is not a lack of 'impact,' but a historical failure of the existing mitigation framework."

8) Enforce 'Hard Look' Requirement: "As lead agencies, you are legally mandated to perform a 'hard look' at cumulative socioeconomic impacts under NEPA and MEPA. Approving a 42-year permit extension while relying on obsolete socioeconomic baselines from 1998 would be an arbitrary and capricious decision that fails to meet these statutory obligations."

9) Require Specific Impact Plan Amendment: "We request that the resulting Final EIS include a specific directive

requiring an amendment to the Nye Mineral Development Impact Plan. The socioeconomic analysis must conclude that the current plan is inadequate and must be updated to formally designate Park City School District No. 5 as an 'affected local government unit' eligible for tax-sharing allocations."

Thank you