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Organization:

Title:

Comments: My name is Ty Heppner, and I am the parent of children attending Park City School District No. 5. I am submitting this comment because the decisions made during this environmental review will directly affect my children's education, our community's future, and the financial burden placed on local families.

As a parent, I want my children to learn in schools that are adequately funded, have safe transportation, and can plan for the future without being overwhelmed by growth caused by one of the largest industrial operations in our region. Unfortunately, Park City has shouldered these impacts for years without receiving the mitigation that was intended under Montana's Mineral Development Impact Act.

The Draft Environmental Impact Statement must reject the outdated socioeconomic assumptions that have guided decisions since 1998. The original impact analysis relied on home values of approximately \$70,000 and economic conditions that no longer resemble today's reality. Property values, housing costs, inflation, and tax burdens have changed dramatically over the past three decades. Continuing to rely on those obsolete assumptions would significantly underestimate the financial impacts borne by Park City taxpayers and families.

The socioeconomic analysis must also acknowledge that the mine has grown far beyond what was originally anticipated. The original impact plan evaluated a maximum workforce of approximately 700 employees. In reality, the mine has at times employed more than 1,700 workers. That expansion has created decades of cumulative impacts on our school district, including increased enrollment pressures, expanded bus routes, greater transportation costs, and additional demands on educational services. Those impacts have occurred without corresponding mitigation through the mine's tax base.

The Final EIS should thoroughly evaluate the property tax structure affecting individual school districts and recognize that Montana law, including MCA 90-6-401, was intended to mitigate exactly these kinds of impacts. Park City School District's ability to finance school facilities and maintain reasonable property taxes has been undermined while much of the mine's taxable value remains concentrated elsewhere. The analysis should recommend equitable sharing of the mine's property tax base so that Park City can maintain stable school funding, preserve bonding capacity, and reduce the growing burden placed on local homeowners.

The agencies should also carefully evaluate how company housing policies and transportation practices affect surrounding communities. Limits on mine-sponsored housing and workforce transportation requirements have pushed many employees and their families into communities such as Park City, increasing demands on our schools, roads, and public services. These indirect socioeconomic impacts are foreseeable consequences of mine operations and deserve meaningful analysis.

The Draft EIS should further examine both in-migration and out-migration associated with mining operations. Our school district experiences enrollment increases when mine employment expands and enrollment declines when staffing contracts. These fluctuations directly affect school budgets, staffing decisions, transportation planning, and educational programming. This relationship is documented through decades of enrollment patterns and should not be dismissed as speculative. The socioeconomic analysis must accurately evaluate the correlation between mine employment levels and student enrollment rather than treating these impacts as unproven.

I am also deeply concerned about the inequitable treatment of Park City compared to other school districts. The original 1998 Impact Plan granted "affected" status to neighboring districts based largely on projected impacts and estimates. Today, Park City is being required to satisfy a much higher evidentiary standard despite decades of documented impacts. Holding our district to a standard that was never applied elsewhere is fundamentally

unfair and should not continue to justify our exclusion from mitigation.

The agencies should include in the administrative record a comprehensive review of Park City School District's repeated efforts to obtain mitigation. In particular, I request review of the audio recordings and transcripts from the September 24, 2021, and November 30, 2023, Mine Impact Board meetings. Those records clearly demonstrate that Park City's exclusion reflects shortcomings in the existing mitigation framework-not an absence of real impacts on our schools and community.

As the lead agencies responsible for this review, both the Forest Service and the Montana Department of Environmental Quality have a legal obligation under NEPA and MEPA to take a genuine "hard look" at cumulative socioeconomic impacts before approving a permit extension that could allow mining operations for another 42 years. Relying on obsolete socioeconomic assumptions from 1998 while ignoring decades of documented changes would not satisfy that obligation and would result in an arbitrary and unsupported decision.

Finally, I respectfully request that the Final Environmental Impact Statement include a specific recommendation requiring amendment of the Nye Mineral Development Impact Plan. The socioeconomic analysis should conclude that the existing plan no longer adequately addresses the mine's actual impacts and should recommend formally designating Park City School District No. 5 as an affected local government unit eligible for appropriate tax-sharing allocations.

As a parent, my concern is simple. My children deserve schools that are fairly funded and capable of serving the families who live here because of this mine. Local taxpayers should not continue carrying costs that Montana law intended to be mitigated by the development creating those impacts. This permit extension provides an opportunity to correct decades of inequity. I respectfully ask you to ensure the Final EIS reflects today's realities, not outdated assumptions from nearly thirty years ago.

Thank you for your consideration.

Ty Heppner
Park City, MT