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Organization:

Title:

Comments: To Whom It May Concern:

AS the parent of children attending Park City School District #5. I respectfully request that the Montana Department of Environmental Quality and the Custer Gallatin National Forest ensure the Stillwater Mine Complex Amendment 014 Environmental Impact Statement fully evaluates the cumulative socioeconomic impacts extending the Stillwater Mine's operations for an additional 42 years. Residents of Park City have been diligently fighting for our fair share of the impact money that is awarded to the other communities within our county and who also have employees of Stillwater mine and students attending their schools.

I would like to start by stating the obvious and what we try and teach our children daily in that everyone counts and matters. With that sentiment, it should be obvious that the mine should distribute accordingly to, at the very least, the communities within the county in which the mine is located. Why would one employee and their family benefit from monies to the school and some tax sharing when others do not. Park City has been continually excluded despite having a significant number of residents who work at the mine and students who belong to parents who work at the mine. It is a shame that one would think some students and people matter more than others. For years, neighboring school districts have received millions of dollars in tax-sharing revenues and metal mine trust funds to mitigate the impacts on schools. Park City has received 0%, despite educating up to 15% of the mine's student footprint in Stillwater County.

The socioeconomic analysis should not rely on assumptions contained in the 1998 Impact Plan, including home values that reflected a very different economic reality. Housing costs, property values, inflation, and the financial burden on taxpayers have changed dramatically since that time. The EIS should evaluate present-day economic conditions and the actual costs borne by Park City taxpayers rather than outdated projections.

The original impact analysis was based on a projected workforce of approximately 700 employees. The EIS should evaluate the cumulative impacts associated with the substantially larger workforce levels that have occurred over time. Those changes have implications for school enrollment, transportation routes, educational facilities, and local government services. Any socioeconomic analysis should reflect actual historical conditions rather than outdated workforce assumptions. Prime examples of this include the need for a parking area in Park City for Stillwater Mine employees to catch the bus.

The EIS should evaluate the structural tax base of the individual school districts affected by mine-related growth and determine whether existing mitigation adequately reflects the educational impacts experienced by Park City Schools. The analysis should specifically consider whether equitable property tax base sharing, consistent with Montana law, is necessary to stabilize school finances, maintain bonding capacity and reduce the financial burden placed on local property owners. We have outdated educational facilities with zero tax assistance to help with needed bonds. This past winter we lost the roof on our gym. Had we had tax assistance from the mine, we may have possibly gotten a bond to pass in the past that would have helped with having classroom and gym space for our students. Instead, our students had to return to remote learning.

The analysis should recognize the documented relationship between mine employment levels and school enrollment rather than treating those impacts as speculative. The fact of the matter is that Park City has a significant number of students whose parents work at the mine but even if it was just one student, every person matters and can make an impact on the environment. We are a class C school this year but because we have had students moving into the community some of which are students of mine employees we occasionally have to move to Class B. However, we do not have the facilities to maintain a Class B sports attendance. Columbus is

also Class B and in our district when we are Class B. We do not have the gym space or the classroom space for that amount of attendance. The assistance from the taxes and funds related to the mine would be a huge benefit to our students.

The EIS should examine whether Park City Schools has been evaluated under a different and more burdensome standard than neighboring districts that previously received recognition as affected local government units. If earlier determinations relied on projected impacts while Park City is now expected to satisfy a higher evidentiary threshold despite decades of documented experience, that inconsistency should be acknowledged and evaluated as part of the socioeconomic review.

The agencies should review the public record documenting Park City's longstanding efforts to obtain appropriate mitigation. As previously mentioned, Park City has actively been trying to get this amended for years. It is sad that we have received pushback from not only the mine but the county commissioners, as well.

As a parent, my concern is simple: our children deserve schools that are adequately funded to meet the demands created by major industrial development. The purpose of the EIS is not only to evaluate environmental impacts but also to ensure that the social and economic consequences of development are honestly assessed and fairly addressed. I respectfully request that the agencies prepare a comprehensive socioeconomic analysis that reflects current condition, examines the full historical record, and considers appropriate mitigation measures so that the costs of long-term mineral development are not borne disproportionately by Park City families and taxpayers

Thank you for your time. Our students deserve all of our attention!

Sincerely,

Ashley Heppner