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Comments: Dear Forest Supervisor Jackson,

I was born and raised in Idaho and have made McCall, Idaho my home for the past four year. As a long term Idahoan, I care passionately about Idaho. Consequently, I am deeply dismayed by the Stibnite Gold Mine proposal and the many ways it will negatively impact Payette and Boise National Forest lands, Endangered Species Act listed species, and local communities. The draft environmental impact statement does not sufficiently mitigate many of these impacts, but it is particularly deficient in regards to climate emissions.

The SGP DEIS does not adequately address the mine's impact on climate change. In fact, the DEIS tries to absolve itself of comprehensively accounting for emissions output. In section 4.4. the document states: "Guidance provided by the U.S. Forest Service has indicated that, 'it is not currently feasible to quantify the indirect effects of individual or multiple projects on global climate change...'" Following this quantifier, the DEIS fails to systematically account for all the climate emissions that it will produce. For example, it states: "GHG estimations associated with the transport of antimony concentrate are speculative and cannot be quantified." "There is very little information on the energy usage, and GHG emissions, of smelting and refining antimony concentrate." Lack of knowledge, insufficient modeling, and insufficient research do not absolve the DEIS of fulfilling the requirements of disclosing the direct, indirect and cumulative impacts of this project. See *WildEarth Guardians v. Zinke*, 368 F. Supp.3d 41, 69-70 (D.C.C. 2019) (rejecting BLM's argument that because BLM assumed it could not quantify greenhouse gas emissions it was not required to do so under NEPA). Furthermore, the draft DEIS doesn't account for material sources of climate emissions such as the impact of building employee housing, the additional number of tires that will have to be produced for the haul trucks, etc. etc. The DEIS must account fully for all the carbon emissions that the project will produce. A full accounting of emissions must be made, as legally required by NEPA. See *Id.* Furthermore, as a project marketed as an environmentally-friendly, sustainable mine, there is a considerable ethical responsibility on the part of Midas Gold to fully account for the carbon emissions that its project will produce.

Not only does the DEIS fail to adequately account for its climate emissions, it does nothing to mitigate the impacts of those climate emissions. Appendix D-23 has one reference to mitigation efforts: "Midas Gold will utilize "smart grid" technology to reduce energy consumption, such as auto dimming lights in offices." There are significantly more efforts that can, and should, be made to reduce project emissions. For example, Midas could use electric haul trucks, significantly reducing climate emissions due to diesel and gas consumption. Employee housing and the Logistics Facility could be built to Passive House standards, thus reducing heating/cooling and overall energy use dramatically over the lifespan of the buildings.. See [www.phius.org](http://www.phius.org). Midas could be required to build renewable energy infrastructure to produce a significant amount of its energy usage onsite, or even offsite as a renewable energy credit. These are just a few measures that could be taken to offset the carbon emissions that the mine will produce. There are many more to be considered.

Although the DEIS again tries to absolve an accounting of climate impacts by stating, ""Effects of ongoing climate change in the SGP area following implementation...would be largely the same at those that would occur regionally and in Idaho without the SGP." This statement is, in fact, patently false. The mine would increase regional emissions exponentially. As such, it must take seriously a full accounting of the carbon emissions of the project and mitigation efforts. Climate change poses an existential threat and it is past time that companies, like Midas Gold, seriously addressed climate change impacts when proposing new projects. But perhaps most pressing in regards to this DEIS, there is, at a minimum, a legal compulsion to fully account for GHG emissions.

Thank you for your consideration. As an Idahoan, Valley County resident, and mother, I hope Midas Gold and the

Forest Service will take these concerns seriously and show real care for our state, county, and future.

Michelle Blank