Data Submitted (UTC 11): 1/9/2023 8:39:27 PM
First name: Judy
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Organization:
Title:
Comments: Dear Forest Service Employees,

RE: Public Comment on the SDEIS -proposed Stibnite Gold Project January 6, 2023

I know you have suffered with this complex behemoth project. I know you have worked hard and probably had to compromise or ignore things when you did not want to. This is a small town and word gets around and I know you have been under intense political pressure and agency pressure. I am sorry.

But I am going to have to put more pressure on you. And it is the pressure we all feel at this juncture watching with growing horror at the chaos unfolding as the result of climate change. Basically, humans, especially Americans, have refused to change and the result has been everything is changing.

But the Forest Service, as trusted stewards of our land and waters and the creatures who inhabit them, has got to change. Whereas a few years ago it may have been excusable in an EIS to give climate change short shrift. It is unconscionable now. And especially unforgivable in an agency supposedly guided by science and dealing with a huge industrial gold mine like Stibnite.

As Antonio Guterres, Secretary General of the United Nations said several months ago," We are on a highway to climate hell with our foot still on the accelerator…. Humanity has a choice-cooperate or perish." The sense of urgency about the timetable climate change is forcing on us, felt by much of the world and by many here in Valley County, is completely lacking in the DEIS and the SDEIS. Why? The greatest challenge of the 21st century is substantially ignored?

The caveats in the SDEIS when it comes to the huge amount of GHG emissions that will be generated by the mine are unacceptable. It claims that the emissions don't really matter because there are no Idaho or Fed regulations so the SDEIS can't "quantify the costs or significance". Does that justify that the Forest Service is not going to analyze them or demand responsibility or mitigation for them? REALLY?

And then the SDEIS basically says that, "Aw,heck they aren't that big when you compare them to the whole state or the global emissions" Even though the Council on Environmental Quality makes it clear that Federal agencies cannot ignore impacts of climate change from proposed actions because the emissions only represent a small fraction of global emissions. In fact, they say that comparing emissions of any project to global emissions is a flawed understanding of how climate change works and cannot be used as a basis for deciding not to consider climate change impacts under NEPA.

In addition, the calculations of the emissions from the proposed Stibnite mine are problematic as they leave out sectors. Table 4.4, 2a and 2b lists the tons per year but leaves out years 19 through 40. The SDEIS also leaves out emissions from: antimony concentrate transport to a processing plant; a more realistic estimate of emissions from the preferred methos of reduction smelting of antimony; the emissions from transport or commuting from the junction of Warm Lake Road to wherever cars or trucks are going or coming from.

And the SDEIS also leaves out the significant emissions from the massive use of electrical energy as 40% of Idaho Power's energy still comes from fossil fuels not hydro…and hydro is dependent on water flows which are and will be impacted by climate change. There would be an approximate annual emissions amount of 97,000tons of CO_2e being added to our region's emissions from Perpetua's electrical use that does not currently exist and is not accounted for in the SDEIS. There is again no mitigation offered. Without an addition of new energy generation to the Idaho Power grid to mitigate the additional demand and mitigate the resulting emissions, the Perpetua increased demand and generated emissions would be the responsibility of Idaho power customers including the City of McCall and its residents to solve and pay for.

These unmitigated GHG emissions (those acknowledged in the SDEIS and some ignored) would approximate

over the lifetime of the operations 4,992,546 Metric Tons of CO2e . The burden of these emissions, which could almost double what we are emitting now, will fall on the city and the county to address. This will frustrate our present efforts to curtail emissions and frankly is unfair and would be taking all of us in the opposite direction of where we should be going as a region and a society.
The second horrifying issue involving climate change is the fact that most of the negative impacts of the mine (some of which are admitted in the SDEIS) will be exacerbated, accelerated, and intensified by climate change. (4-67 to 4-72 SDEIS)
So whether we are talking about the stress on recharging groundwater; lower stream flows; the difficulty of revegetation and reclamation; high water temperatures; loss of wetlands and riparian areas; vulnerability to floods, landslides, avalanches; air pollution…ALL of these impacts will be exacerbated by climate change and are guaranteed to worsen thru time as climate change gets more chaotic. And any mitigation proposed for any impacts in this mine are completely called into question by the effects of climate change and their increasing extremeness and unpredictability.

The SDEIS mentions this possibility but then drops it …just drops it. There is no comprehensive climate mitigation plan offered. There are no buffers mentioned that could be built into any measurements or models to take into account the inevitable trajectory of climate change…. a trajectory that will affect every aspect of this project and will only intensify.
Any mitigation proposed for any impacts in this mine are completely called into question by the effects of climate change and their increasing extremeness and unpredictability.

Here we are dealing with complex systems, we are dealing with flawed models like the one for surface water that doesn't even take climate change into account. We are dealing with difficulty quantifying, multisource impacts, possibility of systemic catastrophic consequences…doesn't standard practice call for at least sophisticated buffers and defer to PRECAUTION?
Climate Change is the variable that changes everything. It confounds every other variable.

The tremendous risks involved in this Proposed mine, the high unpredictability because of climate change of the success of any mitigation offered in the SDEIS for any impact, the inability of the SDEIS to take responsibility and really grapple with climate change…all of this points to one conclusion- THIS MINE SHOULD NEVER HAPPEN.
We must take our foot off of the accelerator.
The No Action Alternative is the only viable one for our future, for our country, for us.
Judy Anderson