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First name: Phil
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Organization:
Title:
Comments: 18 October 2024

Phil Lansing, MAoxon

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Forest Supervisor Matt Davis

Payette National Forest

Dear Supervisor Davis,

I am a retired professional economist. I was trained in the field at University College Oxford, graduating with an MAoxon in 1982.

On 27 October 2020 I submitted approximately 2000-word comments on the Stibnite DEIS (#9979, FEIS Appendix B pg. B-729). In those comments I raised serious concerns about the methodology used in the Social and Economics Conditions section. The summary of those comments is below:

SUMMARY

The DEIS draws on an economic methodology that is not conducive to real insight into project impacts. It is applied in a way that does not well describe the area economy and thus projects economic benefits almost exclusively with little or no modeling of very real economic costs. The DEIS is self-contradictory in its discussions of impacts on housing and schools, playing down impacts on one hand and admitting them on the other.

The DEIS suggests a need for diversification funding to mitigate a post-closure economic downturn; but offers no suggestions for how to pay for it. To the authors' credit they do point out that only $300,000 annually in local property taxes would be paid by Midas over its twelve-year mining phase; a trifle given the described needs. The DEIS violates analysis norms by failing to account for the time value of money. The DEIS social impacts section fails to address commenter concerns in a substantive manner and does not make sense.

END OF SUMMARY

Your response to my comments is in the FEIS on page B-729. It states that no response is required. Oddly, my comments are quite erroneously listed as positive.

My comments pointed out plain, obvious failures in methodology which subsequent DEIS' and the FEIS ignore. My criticisms were hardly arcane; I just pointed out proper, up to date methodology. One can only speculate on why they were ignored.

The obvious remedy is for the USDA Forest Service to withdraw the FEIS and DROD and start over.

Sincerely,

Phil Lansing