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Comments: Dear Payette Forest Supervisor Davis; October 20, 2024

As stated in my comment letter of 2023 on FEIS Appendix B pp.B- 179,B- 180:
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 methods 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 CO_2e . 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.

In response to these comments, the FEIS at Appendix B pp. B-179 and B-180, the FS just kept repeating the following paragraph;
"On January 9, 2023, the Council on Environmental Quality (CEQ) published interim "National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change" in the Federal Register (CEQ 2023). CEQ grants agencies the discretion to decide whether to apply the guidance to NEPA analyses that were in progress when the guidance was issued. The interim CEQ guidance was published late in the development process for the DSEIS, and therefore this EIS primarily relies on earlier CEQ guidance on considering climate change in NEPA (CEQ 2016). For example, this EIS does not include all new recommendations such as applying social cost of GHG estimates to the incremental metric tons of each individual type of GHG emissions expected from the Proposed Action and its alternatives. However, this EIS does analyze the two fundamental considerations required by current and former iterations of CEQ climate change guidance: (1) the potential effects of a proposed action on climate change, including both GHG emissions and reductions from the proposed action (see below), and (2) the effects of climate change on the proposed action and its environmental impacts. Currently, potential climate change impacts are addressed throughout the EIS and Specialist Report in a qualitative manner. Additionally, Project-related GHG emissions are outlined."
AND
On p. B-179, the FS response to my comments is "The activities described in Tables 4.4-2a and 4.4-2b would not continue past Year 18. The effects of vehicle travel, off-site power generation, and antimony concentrate are described in SDEIS Section 4.4.2.2 under the Indirect GHG Emissions section."

The Response is Inadequate:
A more accurate description of what is said in Section 4.4.2.2. is that " the SGP direct and indirect GHG emissions would be a negligible and long-term increase in regional GHG emissions" Basically saying that none of us have to take responsibility for our emissions because when you compare them to the Big Picture they aren't very much. Well, isn't that the road to climate hell? No responsibility ever. But as I pointed out in my letter, the

SGP would almost double the emissions of Valley County and that is not regionally negligible. Or is the FS defining regional to include the whole Western USA. That is a game we cannot play as responsible citizens.

On p. B- 179 and B-180 the FS responds to my comments with "On January 9, 2023, the Council on Environmental Quality (CEQ) published interim "National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change" in the Federal Register (CEQ 2023). CEQ grants agencies the discretion to decide whether to apply the guidance to NEPA analyses that were in progress when the guidance was issued".

The response is inadequate:
This is more than inadequate. It is a slap in the face to everyone's concerns about climate change. The FS had the discretion to do a thorough job quantitatively analyzing the impacts of climate change instead it dismissed it as not essential or whatever and in 4.4.2.2 just used words like… climate change: " could potentially impact the severity of the spill; could potentially affect the ability of streams to maintain flow rates and recharge; could exacerbate certain geologic hazards; "; 'could cause more frequent landslides";" impact surface water resources through increased sedimentation and runoff"; "revegetation could be more difficult; "changes in precipitation and evaporation could impact water balance which could result in significant changes to the amount of water being treated and discharged"; wetlands would be "vulnerable to additional impacts from long-term climate change trends such as lower streamflows and less groundwater recharge"; " adversely impact aquatic species and habitat"; "cause an increase in severe events, such as floods, landslides, and avalanches adding stress to roadways and other infrastructure" "decreasing ground cover,, larger wildfire burn areas".....
THe list goes on and on and ends with" The effects of these natural changes cannot be accurately quantified" Is that a Pontius Pilate move of washing the hands of any responsibility or what? Yet the FS was asked repeatedly to use easily obtainable climate models in their modeling. And you did not. The FS offers No Mitigation, No buffers for the inevitable overwhelming effects of climate change that become more obvious and dangerous every day. It is a negation of NEPA's important role in providing critical information, its mandate to take a Hard Look at the repercussions of proposed actions. The increasing urgency of the climate crisis demands quantitative analysis and concrete mitigation. For example, Climate change will require mine facilities to withstand larger storms to avoid overtopping. Data/ analysis of climate forecasts are readily available but were not used to redesign infrastructure. This decision to not take a hard look at what will be needed to buffer climate disasters could be deeply dangerous to human health and the health of our waters.

On B- 179 the FS responds to my comments with "It is acknowledged and understood that concerns regarding potential long-term environmental impacts, ecological integrity, and the well-being of potentially affected communities are valid and important to consider. During the decision-making process, the Forest Service will seek to identify the best possible balance between environmental protection, community needs, and sustainable forest management."

This response is inadequate:

We are dealing with a crisis of unimaginable proportions with climate change. It is unlike any that the FS has faced in its existence. Administrative language falls flat. The" best possible balance" will not be enough. We may have to absolutely choose protecting the environment as the only possible alternative to ensure human survival, and set aside human needs(desires) for gold and more military grade munitions. The IPCC's latest report, which is the gold standard of climate assessment, says we have 5 years to reduce emissions by one- half or face catastrophe.
I hope the FS will withdraw the FEIS and DROD and not issue any decision or take any action based on an inadequate FEIS

Sincerely,
Judy Anderson