

TO THE OBJECTION REVIEWING OFFICER OF
THE STIBNITE GOLD PROJECT AS WELL AS
ANY AND ALL CO-OPERATING AGENCIES OF
CONCERN, PAYETTE or BOISE NATIONAL
FORESTS AS WELL AS ANY AND ALL
OTHER PUBLIC LANDS EFFECTED.

PLEASE INCLUDE THESE COMMENTS OF OBJECTIONS,
AS WELL AS PRIOR COMMENTS MADE ON
AND ABOUT THE STIBNITE GOLD PROJECT PROPOSAL.

WITH CONCERNS:

John Lewinski

[REDACTED]

[REDACTED]

[REDACTED]

October 4, 2024

To the objection Reviewing officer of the Stribnife Gold Project:

The comments that I am submitting are connected to the current US Forest Service Payette National Forest Draft Record of Decision on the Stribnife Gold Project of Valley County Idaho, as well as the project concerns the Boise National Forest and any and all other Public Lands effected.

The allowed comment period of 45 days in all is much too short. Many serious and unresolved concerns and issues about the project warrant new analyses. The SFEIS and the DROD do not ensure that all state and federal environmental or natural resource requirements have been met.

My original comments are included. The concerns that I presented have not been adequately addressed, nor have satisfactory results been brought forward. Reading through the current documents bring to mind more issues and concerns than ever. Out of date research, tables, models and sources do not apply to current situations and acquired information.

My main concerns focus on the fate of the Wolverine and its ability to survive. There is a failure to minimize all adverse environmental impacts and protect public or wildlife resources under the Organic Act. There is a failure in these reports (SFEIS & DROD) to explain and demonstrate how this proposed project would comply with the Threatened and Endangered Species Act.

All aspects considered, the demand for NO ACTION! is needed to be implemented, as the environmental choice has been presented as the preferred alternative.

- No to amending Payette Land and Resource Management Plan.
- No to amending Boise Resource Management Plan.
- No to the Burnt Log Route as it violates the Idaho Roadless rules and requirements.
- Wolverine loss of acreage of habitat for migration, foraging, breeding and increase of direct mortality is unacceptable. The disturbances of light, noise, dust, toxic contaminations of air, water and vegetation as well as increased human activities, even for a short duration, will cause great trauma.

NO ACTION!

1.10-01/1-25. 2.4.4.3 / 2.4-5. section 3.13 ALL of 4.13
7.6 pg. 4.428-433 specifically

... take of an individual or population could occur for various reasons such as traffic collisions, change in an individual's or population's habitat use due to noise, other disturbance or contamination of food or water sources. Direct effects also would include loss of habitat or encroachments into migration or travel areas...

Noise and light due to operations ... particularly blasting and helicopter flights

Road plowing in the winter

Roadkill attracting wolverine add threat of dire consequences

• Special Designations

... SGP operations would affect soundscapes, natural dark skies and natural wildlife distribution within the FCRNRW, impacting the untrammeled quality of wilderness.

The SGP would result in emissions that would effect air quality in the FCRNRW.

- Noise is unacceptable for humans and more so for wildlife. There is inadequate data monitoring for the wolverine. Perpetual disturbance is detrimental.

3.6 pg. 2-107 pg. 3-89

- LIGHT 24 hours a day for years is not natural for any living being of any sort.
- AIR is currently under litigation. The unsafe ambient area, toxic particulates and misconstrued data are unacceptable.

ES-10 1.10-1/21 24-13 pg. 3-70 5.3 4.3.1-7

- NO to powerline and development as it is intrusive to all natural environmental habitat.

pg. 2-6 / 2.30-32 / 2.4.4.8

- Hazard material risks are unacceptable on all counts and considerations, from on-site to end delivery.

- ORV's are not satisfactory.

3.19.44 pg. 3-457-470 figure 2.4-1.9 section 3.5

- Vegetation aspects are in denial of real reclamation success. The sterile and unknown future present no life for plants, insects and upward to create a viable food chain — whether for the wolverine or all. The use of pesticides and the influx of noxious plants are a high risk to the environment.

pg. 2-118 ES-18

- There is a complete loss of wilderness untrammelled!

4.5 / 4-87

- Burnflog violates the Idaho Roadless rules and requirements as new and permanent leavings will alter the landscape. The disruption to the boundary of wildness with human interruptions, increased noise, lights and environmental alterations are not acceptable. The soil/silt/disturbances and most other factors are so close to those of the Johnson CK Route as to put Burnflog out of consideration, eliminating threats to wetlands, sensitive plant species, habitat disruption and wildlife harassment.

ES-32 section 219.9 Appendix X

No matter what topic or aspect that I look into with this proposed project, the cumulative effects appear to be devastating. The length of time of the project only compounds that devastation. NO ACTION!

Do not permit the very harm that you are supposed to prevent.

With Concerns,

Lynn Lewinski

LYNN LEWINSKI



woodland, and so, despite the presence of some mighty hardwoods, the authorities granted the landowner a clear-fell license to raze the lot. All the characters of the boreal were there—Scots pine, birch, larch, spruce rowan—and several others, like alder, ash and Douglas fir too.

When I walked down the road with my two daughters to survey the damage done to the places they used to play, the stone shaded by a birch tree they called the river café, or the deep pool below a fallen poplar known as Heron's home, they were so shocked they burst into tears. Logs were piled high, the air heady with sap, the steep stream banks littered with branches and the rain filling the deep tank tracks of the logging machines making the river run a cedar shade of red. The girls could see the mountains beyond for the first time in their short lives. They are six and four. They asked why the trees were being cut down when we need the oxygen they produce and the rain they condense, but what upset them the most, causing another round of sobs, was concern for the living things that call the forest home.

"The trees must have been crying!" (An idea familiar to the First Nations of Canada.)

"What if a mother ladybird came back to her nest only to find the tree had been cut down and her babies were gone!"

Patenting in an era of rapid climate change does not allow for the luxury of misanthropy or false hope. We must, to paraphrase the University of California anthropologist Donna Haraway, "stay with the trouble."³

My imagination was gripped by the moving treeline after finishing my last book about refugees in the Horn of Africa. This was not just the desire to go somewhere cold after the unforgiving heat and dust of the equatorial desert of Kenya and Somalia. The Horn of Africa, like the Sahel belt in general, is particularly sensitive to climatic changes in the oceans and rainfall patterns driven by teleconnections with forests and deforestation—elsewhere. The displacement and violence there are largely driven by drought and climate change, and I wanted to write about other places where the impacts of warming were already visible, where one could catch a glimpse of the future.

I did not realize how relevant my experience of reporting on war and refugees in Africa, about people struggling to find meaning and hope in

difficult circumstances, would turn out to be. Victims of wars or natural disasters are often far better equipped to imagine and respond to dramatic change. In a disaster the social order is stripped away and we are revealed to ourselves anew. The "human" is unleashed, freed of its habitual constraints, sometimes with barbaric consequences but more often with positive effects. People are capable of extraordinary things. What I learned in the ruins and refugee camps of Congo, Sudan, Uganda and Somalia is that struggle produces hope, not the other way round. Hope is not an inert precious metal lying around waiting to be discovered, it is something that must be manufactured and redefined in the light of shifting circumstances, every day. And here the lesson is that despair is the first step toward repair. Acknowledging the damage of the past is empowering, like the elders of Poplar River transforming colonial grief into a movement that secured North America's largest protected forest, or Thomas MacDonnell reversing centuries of over-browsing by sheep and deer to begin the restoration of Scotland's great wood.

It is a bourgeois conceit that hope has become synonymous with saving—or attaining—an ideal state of affluent security, especially when such affluence is incompatible with planetary limits to economic growth. Märret Buljo in Norway would laugh at such an idea. Hope lies in shared endeavor, in transformation, in meaningful work for the common good. We are on the brink of a new epoch in the life of the planet. At least two degrees Celsius of warming is already "committed"—in the pipeline—although some scientists project even more than that, up to four degrees Celsius of "implicit warming."⁴ Before the end of the twenty-first century there will be a wave of extinctions, trees will leap north, steppes will expand, the tundra will disappear along with the Arctic sea ice, the oceans will be reconfigured and cities will flood. The last generation to know a stable climate with seasonal cycles and familiar species—and all the human culture and traditions that rest on that foundation—has already been born.

This is hard. But accepting that the status quo is irretrievable is also the door to action. Suddenly there is so much to do. The struggle to limit the damage and prepare for what is coming has already begun. This is the philosophy underpinning Black Mountains College, a new model educational institution which I cofounded and which is

TO THE USDA FOREST SERVICE, ALL CO-OPERATING
AGENCIES, AND MS. LINDA JACKSON, FOREST SUPER//
PAYETTE NATIONAL FOREST

PLEASE INCLUDE, POST, FORWARD AND RESPOND
TO THESE COMMENTS ON AND ABOUT THE
STIBNITE GOLD PROJECT PROPOSAL/SUPPLEMENT.

LYNN LEWINSKI



October 25, 2020

To The Payette National Forest Supervisor, Linda Jackson:
Personally, I have many doubts and concerns about the integrity of the current Payette Forest Draft Environmental Impact Study on the proposed Stibnite Mine project.

"... political operatives tend to interfere with the technical decisions made by agency professional staff. At this stage, the agency chiefs put pressure on personnel they supervise to make permit decisions in favor of their allied industries" NATURES TRUST

For the length of time taken to compile this report an appropriate amount of time should be given to the public to read, comprehend, study and understand the complex and confusing aspects presented. The time given is not enough and should be extended. No informational presentations were given to the public by the Forest Service.

The City of McCall presented 4 forums of public informationals given by professionals, with public questions and declarations of concerns that were extremely well attended. (Note: These forums were taped and available for reference.) The City of McCall realized the serious implications

that this project presented to its citizens and the future of the community.

X copy of the D.E.I.S. is basically not available. Computer access to this document is difficult.

X I do not own a computer, I feel unable to obtain information. Denying access to many is a civil wrong on so many levels.

My concerns are for the Wolverine and the fate of its survival, which I do not feel are adequately addressed for its protection by proceeding with this proposed mine project.

The Wolverine is a unique and hard to study creature by its very nature. Preferring isolated and undisturbed habitat, the Wolverine defends a large territory for itself and its den. This creature has a diminished population that will be further placed at risk by the disruptive activities and intrusions of this proposed mine and its development.

The D.E.I.S states: hundreds of thousands of acres of directly and indirectly impacted Wolverine habitat would result from mine activities.

(Chapter 4.13.2.1.3.2) Wolverines are specially designated...

The constant noise of drilling and blasting to create, move, and haul rock are beyond the scope

of tolerance.

The extreme lighting for night shifts is completely unnatural.

How can a sensitive creature cope with these intrusions? What action is able to mitigate these horrific upsets of peace and quiet? Continued for 10 years, the wolverine will be annihilated. How is this acceptable?

The proposal of building the Burnt log road and access to the wilderness creates extremely disruptive effects that will diminish all environmental habitats.

Any consideration for public use should not be allowed. The detrimental consequences will be abhorrent to all Nature. Have the impacts of public use been considered?

The wolverine population will diminish; wilderness will be lost. How will the exploitation of these lands for a few for short term benefit the future of wilderness for perpetuity?

I demand NO ACTION towards the expansion of this proposed mining operation plan as the only way to ensure protection and survival of the wolverine. There is too great a cost in harming Nature.

I do not feel this is adequately addressed in the D.E.I.S. We have the responsibility to be better stewards of our lands, our water, our air, and the creatures of these places.

The FS plan does not assure that.

Attempt should be made to place this site in the

Superfund category.

"Where will agencies draw the line against natural resource damage? Where lies the point at which they deny permits? Generally agencies treat this as a political, rather than a legal, matter because they enjoy such broad discretion.

The general pattern seems to be that agencies allow damage until the natural resource stands on the brink of collapse — or beyond. In short, they use their discretion under environmental law to bankrupt Nature"

NATURES TRUST

Do not permit the very harm that you are supposed to prevent.

Concerned,

Lynn Lewinski

LYNN LEWINSKI

References:

"Nature's Trust • Environmental Law for a New Ecological Age"
by Mary Christina Wood
University of Oregon School of Law

The City of McCall Forum Series

STIBNITE GOLD PROJECT SUPPLEMENTAL COMMENTS

WOLVERINE; 2ND COMMENT

"Although wildlife and wildlife habitat were not identified as a significant issue, it was identified by the public, the Forest Service, and cooperating agencies as a relevant consideration." pg 4-337 thru 460

The wild cannot voice concerns of environmental impact. As detrimental impacts demolish and degrade habitat, and species; only the public can demand NO ACTION!

The supplemental draft notes "affect wildness attributes of naturalness", "undeveloped character", "decreased opportunities", "change natural distribution of wildlife and plants", "cumulative effects on", through out the 3 volumes presented. Negative impacts on "outstanding solitude, remoteness", "primitive Recreation Opportunities, Fish, Wildlife, Natural, Untrampled and wildness ... page after page and issue upon issue.

example: pg 5-42 thru 47
5.23 Special Designations

Long term, intensive activities of degrading natural habitat with extensive noise, light, or unacceptable air, water quality, as well as inhibited movement or migration and altered temperatures call for NO ACTION!

CONT.

To consider all probable future possibilities with
compounding and complex demands of expansion call
for NO ACTION!

3.6.1-4 / 4.12 & 4.13
NOISE CONTROL ACT of 1972

The Stallion Gold Horse Heaven project is implying
assumption to public presentation that the Burnt Log Rd.
and electrical powerline will be in place for its new
mining development, x neighborhood of mines developed
on the edge of wilderness is unacceptable madness.

The visual contrasts to integrity, the change to wild,
rivers & land, the loss of Outstanding Remarkable
Values (ORV's) as well as the threats to wolverines
and all imperiled creatures - unable to give voice -
call for NO ACTION!

This draft gives no satisfaction to the protection,
needs and concerns of wild life and their environments.

Please include for reference:

"The Wolverine Way" by Douglas H. Chadwick

"Nature's Trust" by Mary Christina Wood
Environmental Law for a New Ecological Age

"A Wilderness Bill of Rights" by William O. Douglas

Comments by: Nez Perce Tribe, Advocates, ICL, Save South Fork Salmon

"We must maintain the chance for contact with beauty"
Johnson wrote in Presidential Policy Paper No. 3 on November 1,
1964. "When that chance dies a light dies in all of us.
We are the creation of our environment. If it becomes filthy
and soiled, then the dignity of the spirit and the deepest
of our values are in danger"

PRES. L. B. JOHNSON
PREFACE "SILENT SPRING REVOLUTION"

The importance of the site of the proposed Stibnite project goes
beyond the Idaho environment and ecosystem. The effects literally
flow to the Pacific Ocean. The waters effect grasses and trees,
insects and birds and fish and all creatures at in to the
ocean waters, where the orca struggle as the salmon diminish.
The complexities of nature's striving should not be ~~compromised~~
by the profiting of man.

The Midas Gold/Stibnite project, now Perpetua, has always
been a marketing campaign. Currently owned by 2 large
hedgefund companies, the marketing has ramped up and the
lobby pressures increased. Sorting fact from propaganda is
challenging. Curious that there are so many tax advantages.
Curious that antimony has not been needed since WWII.
Curious that mining, an extraction process driven by
profit, has never been claimed to restore, but rather,
destroy. This project will degrade and demolish over 3x
what has originally been altered. This project will not be
an asset to the areas it impacts. Request NO ACTION!

When the impacts of proceeding are more negative than positive; call for NO ACTION!

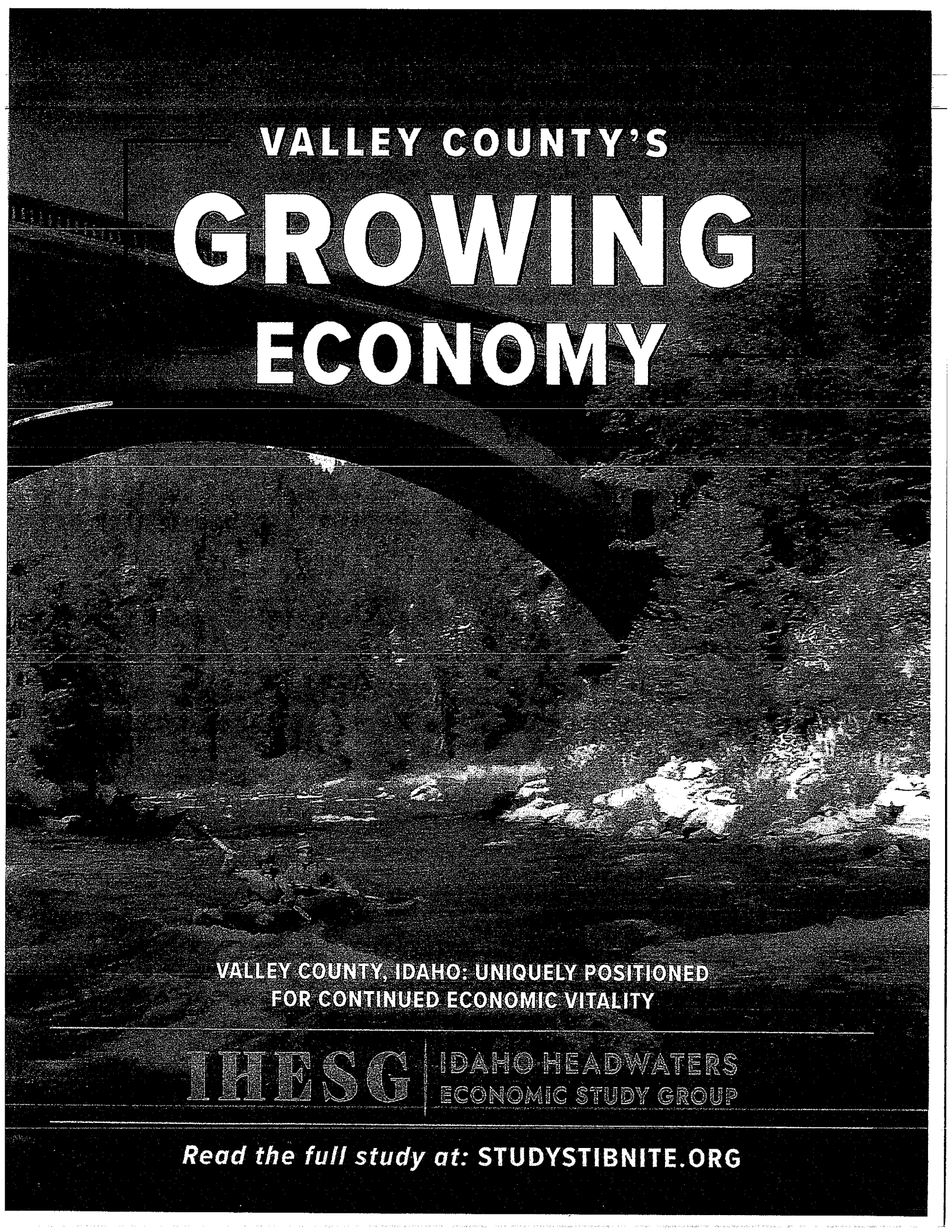
When the information of research and study fail to answer issues and concerns; call for NO ACTION!

Points to be considered, but not limited to:

- Water treatment FOREVER
- Failing liners of toxic waste
- Increased failings of tailings
- Unacceptable air and water quality
(to the point of denying human access -
what of flora & fauna?)
- Inadequate soils for any type of restoration
- Loss of wilderness and untrampled places
(as noted to the extreme loss of contrasts
and integrity to outstanding Remarkable Values)
- Inadequate study of full economic effects / current data
- Inadequate study of full transportation degradation
of infrastructures
- Inadequate study of full complexities to hazardous
waste on-site and transport off-site to sea ports
- Inadequate study of public, civil and service
consequences / current data
- Inadequate study of xenotony and toxic compounds

The truth be told, this proposed project is more trouble than it is worth.

Dynn Lewinski



VALLEY COUNTY'S
**GROWING
ECONOMY**

VALLEY COUNTY, IDAHO: UNIQUELY POSITIONED
FOR CONTINUED ECONOMIC VITALITY

IHESG

IDAHO HEADWATERS
ECONOMIC STUDY GROUP

Read the full study at: STUDYSTIBNITE.ORG

Short-term changes to aquatic habitat in Meadow Creek include diverting a portion of the creek just south of the proposed Hangar Flats open pit, and the loss of habitat where the TSF and TSF Buttress would be located. The short-term loss of habitat would negatively affect fish populations in Meadow Creek over the life of the mine. Closure and reclamation would restore habitat over time.

4.13 Wildlife and Wildlife Habitat

4.13.1 Impact Definitions and Effects Analysis Indicators and Methodology

Although wildlife and wildlife habitat were not identified as a significant issue, it was identified by the public, the Forest Service, and cooperating agencies as a relevant consideration. The analysis of effects on wildlife and wildlife habitat includes the following issues and indicators:

Issue: The SGP may cause changes in wildlife habitat in the analysis area that may affect wildlife species including special-status species (threatened, endangered, proposed, MIS, and sensitive).

Indicators:

- Acres of general wildlife habitat disturbed.
- Acres of special-status wildlife habitat disturbed.
- Acres of disturbance to other high-value habitats such as crucial and or high-value big game ranges, wetlands, and seep and spring areas.
- Change in noise levels (in decibels) in, or in proximity to, wildlife habitat.
- Miles of new roads proposed for the SGP.
- Acres of disturbance for new and upgraded transmission lines.

Issue: The SGP may affect wildlife by introducing barriers to movement, including the mine site, infrastructure, new/existing maintained roads, new transmission line.

Indicators:

- Length of potential movement barriers.

Issue: The SGP may affect wildlife by potentially increasing the risk of direct injury or mortality.

Indicators:

- Amount of increased traffic along the access routes, or acres of ground disturbance for less-mobile species.
- Miles of new roads and transmission lines.
- Miles of existing roads that are not currently plowed that would be plowed.

4-387-
460

There are some who can live without wild things,
and some who cannot. These essays are the
delights & dilemmas of one who cannot.

Like winds and sunsets, wild things were taken
for granted until progress began to do away with
them. Now we face the question whether a still higher
"standard of living" is worth its cost in things natural,
wild, and free. For us in the minority, the opportunity
to see geese is more important than television, and
the chance to find a pasque-flower is a right as
inalienable as free speech.

These wild things, I admit, had little human value until
mechanization assured us of a good breakfast, and
until science disclosed the drama of where they come
from and how they live. The whole conflict thus boils
down to a question of degree. We of the minority see
a law of diminishing return in progress; our opponents
do not.

Leopold
forward: X Sand County Almanac

Wallace Stegner's "Wilderness Letter" { 185 }

valuable as those are, but the wilderness idea, which is a resource in itself. Being an intangible and spiritual resource, it will seem mystical to the practical-minded—but then anything that cannot be moved by a bulldozer is likely to seem mystical to them.

I want to speak for the wilderness idea as something that has helped form our character and that has certainly shaped our history as a people. It has no more to do with recreation than churches have to do with recreation, or than the strenuousness and optimism and expansiveness of what the historians call the "American Dream" have to do with recreation. Nevertheless, since it is only in this recreation survey that the values of wilderness are being compiled, I hope you will permit me to insert this idea between the leaves, as it were, of the recreation report.

Something will have gone out of us as a people if we ever let the remaining wilderness be destroyed; if we permit the last virgin forests to be turned into comic books and plastic cigarette cases; if we drive the few remaining members of the wild species into zoos or to extinction; if we pollute the last clear air and dirty the last clean streams and push our paved roads through the last of the silence, so that never again will Americans be free in their own country from the noise, the exhausts, the stinks of human and automotive waste. And so that never again can we have the chance to see ourselves single, separate, vertical and individual in the world, part of the environment of trees and rocks and soil, brother to the other animals, part of the natural world and competent to belong in it.⁵

The ORRRC thought the letter was magnificent. Career employees of Interior and some in the Forest Service loved Stegner's missive. His letter provided a moral underpinning for the Wilderness bill, just as Albert Schweitzer's "Declaration of Conscience" on Radio Oslo had done for the anti-nuclear testing crusade. In the December 1980 issue of *Living Wilderness* magazine, Stegner looked back and observed that, "Altogether, this letter, the labor of an afternoon, has gone farther around the world than other writings on which I have spent years."⁶ When a friend joked to Stegner that he had become a conservation hero, the author scoffed at the idea. He was no Howard Zahniser or David Brower. "I am a paper tiger, typewritten on both sides," he said.⁷