



**Stibnite Gold Project  
Supplemental Draft  
Environmental Impact Statement**



## **COMMENT FORM**

**Informed decisions are better decisions:** The U.S. Forest Service believes that extensive public involvement will serve to improve communication, develop enhanced understanding of different perspectives, and identify solutions to issues and problems. We look forward to hearing from you!

**Where to provide comments:** Submit this form at a public meeting, mail it in using the address on reverse, or upload comments to <https://www.fs.usda.gov/project/?project=50516> by **January 10, 2023**.

Name LYNN LEWINSKI County VALLEY  
Title — Organization —  
Mailing Address —  
City — State — Zip —  
Email — / written response preferred  
Date January 5, 2023 Meeting Location (if applicable) —

- Please check box if you do not want your name released when comments are made public (see note).  
 Please check box if you want to receive notice of availability of the Final Environmental Impact Statement.

**COMMENT** (use back side if you need additional space or attach additional sheets)

The pages of these comments do not convey the depth of stress felt by the inadequate information nor the frustrations of watching a marketing for profit scheme continue to go on.  
*J. Lewinski*

Note: Comments - including names, street addresses, e-mail addresses, and phone numbers (if provided) of respondents - will be part of the public record. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

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

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

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MCALL ID 83638

208.315.0309  
(email is not in service)

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 informations 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.

\* A copy of the D.E.I.S. is basically not available. Computer access to this document is difficult.  
\*\* 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 P.E.I.S states : Hundreds of thousands of acres of directly and indirectly impacted Wolverine habit 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 supe

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 purity?

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.

No 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  
MCALL IDAHO

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 habit, and species; only the public can demand NO ACTION!

The supplemental draft notes "affect wilderness 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 wilderness ... 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 inhibit~~at~~ movement or migration and altered temperatures call for NO ACTION!

CONT.

To consider all probable future possibilities with compounding and complex demands of expansion (all 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. A 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 · SaveSouthforkSalmon

"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 out into the ocean waters, where the orca struggle as the salmon diminish. The complexities of nature's striving should not be compounded 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 plutonium and toxic compounds

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

Jynn Lewinski

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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.

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email: CDC-INFO

Earth magazine