

**From:** Conway G Ivy  
**To:** [FS-comments-intermtn-payette](#)  
**Subject:** Stibnite Gold EIS Scoping Comment  
**Date:** Friday, July 07, 2017 3:18:03 PM  
**Attachments:** [2017\\_07-07 Ivy Minerals Inc. Comment Letter on Midas Gold Stibnite Gold Project.pdf](#)

---

Dear Supervisor Lannom:

Attached is Ivy Minerals Inc's comment letter in response to your scoping notice dated May 25, 2017 concerning the Stibnite Gold Project. I have also sent the original copy to you by Priority Mail. Thanks you.

Sincerely,

Conway G. Ivy  
President, Ivy Minerals Inc.  
P. O. Box 2532  
Boise, Idaho 83701  
[cgivy1@gmail.com](mailto:cgivy1@gmail.com)  
843-379-0316

Ivy Minerals Inc.  
P.O. Box 2532  
Boise, Idaho 83701

July 7, 2017

Conway G. Ivy  
President

Supervisor Keith Lannom  
Stibnite Gold EIS  
Payette National Forest  
500 N. Mission Street  
McCall, Idaho 83638

Dear Supervisor Lannom:

In response to your request for comments on the Midas Gold Stibnite Gold Project dated May 25, 2017 I offer the following.

The proposal is a result of many years of thoughtful detailed planning involving many interactions with various governmental agencies. Midas Gold is an environmentally responsible company and will execute its plan in an environmentally responsible way.

While the focus of the Environmental Impact Statement (EIS) will be on potential, perceived and hypothetical environmental impacts, my observation of many EIS documents in following the NEPA process is that they give short shrift to considering the economic, health and welfare benefit to humans. Many proponents of environmental concerns fail to consider the human benefits from such projects and instead focus on non-material issues that result in endless project delays. In many instances, these delays lead to significantly increased costs sometimes resulting in project cancellation and the failure to achieve the human benefits that would occur should the project be implemented.

Given the economy of Valley County, it is imperative that you give very strong consideration to the beneficial economic and thus human benefits that will accrue from the Stibnite Gold Project. It is the duty of the Forest Service, not only under the NEPA process, but under the initial agreements made 100 years ago when the State and County transferred the management of the lands in the Payette National Forest to the Federal Government. Under these agreements the Federal Government was to transfer 25% of the total revenue from timber harvest, grazing, mining fees and other revenues from the lands to counties for roads, schools and other county needs. These transfers have a complicated history, but suffice it to say the transfers to Valley County have decreased from \$3.5 million in recent years to approximately \$1.4 million last year. In

Supervisor Keith Lannom  
Stibnite Gold EIS  
Payette National Forest  
July 7, 2017

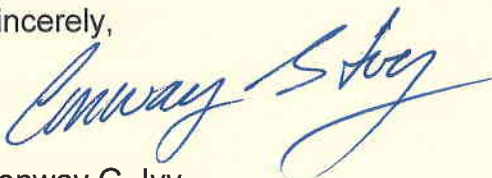
a total context for the nation in the 1980s the Forest Service was transferring approximately \$500 million to the counties which has been reduced to \$50 million in 2015/2016. With 88% of the lands in Valley County being contained in National Forests, the County is having to support its schools and services based on taxes on the remaining 12% of the lands. The reduction in these transfers for the 88% of the national forest lands have placed extreme fiscal pressure on the county resulting in the reduction of services and significant increases in property taxes. County and school salaries have been sub-par making retention of people very difficult.

For these reasons, it is imperative that the Payette National Forest fully support the Forest Service national multi-use policy and provide support for the full utilization of its land resources while following the intent of the National Environmental Policy Act. The preamble of the National Environmental Policy Act which governs the NEPA process of preparing an EIS states it is to "-- - encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man (emp. added), ----". In addition, NEPA regulations require consideration of all economic or social effects of a project that significantly impacts both people and the environment. 40 C.F.R. § 1508.14.

It is my hope that you will, as indicated in the scoping notice, fully evaluate the economic and human impacts of the agency's decision so that it can strike a fully informed and appropriate balance in the EIS for the benefit of the people of Valley County and the protection of the environment which we all fully support.

Thank you for considering my views.

Sincerely,



Conway G. Ivy  
President  
Ivy Minerals Inc.