

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

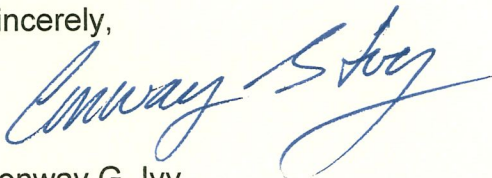
a total context for the nation in the 1980s the Forest Service was transferring approximately \$500 million to the counties which has been reduced to \$50 million in 2015/2016. With 88% of the lands in Valley County being contained in National Forests, the County is having to support its schools and 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.

PRESS FIRMLY TO SEAL

PRESS FIRMLY TO SEAL

PRIORITY®
★ MAIL ★

FROM:

DATE OF DELIVERY SPECIFIED *

USPS TRACKING™ INCLUDED *

INSURANCE INCLUDED *

PICKUP AVAILABLE

* Domestic only

INTERNATIONALLY,
A CUSTOMS DECLARATION
LABEL MAY BE REQUIRED.

107 Mervin Ave
P.O. Box 2532
Holt, Idaho 83701

TO:

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

Expected Delivery Day: 07/10/2017
USPS TRACKING NUMBER
9505 5116 6326 7189 0766 85



RECEIVED

JUL 10 2017

PAYETTE NF
SUPERVISOR'S OFFICE

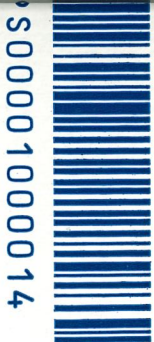


1006

83638



U.S. POSTAGE
PAID
BEAUFORT, SC
29902
JUL 08 17
AMOUNT
\$6.65
R2304M111169-07



S000001000014

EP14F July 2013
OD: 12.5 x 9.5

VISIT US AT USPS.COM®
ORDER FREE SUPPLIES ONLINE

