Data Submitted (UTC 11): 7/7/2017 6:00:00 AM
First name: Conway
Last name: Ivy
Organization: Ivy Minerals, Inc
Title: President
Comments: 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.

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 lmpact 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 focu5'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. lt 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 agreementslhe Federal Government was to transfer

25o/o 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. ln 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 201512016. 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 12o/o 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 suppott 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 etforts 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. S 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.