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Comments: My main concern for the Midas' Gold project at Stibnite is the 323 acres of wetlands that would be used as a holding site for the project's waste and plans for reclamation.

In an article titled, "The Underlying Principles of Restoration," published by the Canadian Journal of Fisheries and Aquatic Sciences, http://www.nrcresearchpress.com/doi/pdf/10.1139/f95-265, AD Bradshaw writes about the importance terms:

[Reclamation] is defined as "'the making of land fit for cultivation,'" but to reclaim is given "to bring back to a proper state." There is no implication of returning to an original state but rather to a useful one. Rehabilitation is "the act of restoring a thing to its previous condition."

Minefacts.org gives similar definitions and states that "the terms are sometimes used interchangeably, and are closely linked, but refer to distinct steps in the preparation of the site for another use." Those steps are described as:

Reclamation: The physical stabilization of the terrain (dams, waste rock piles), landscaping, restoring topsoil, and the return of the land to a useful purpose.

Restoration: The process of rebuilding the ecosystem that existed at the mine site (where applicable) before it was disturbed. The science of mine reclamation has evolved from simple revegetation activities to a discipline which involves using native plants to mimic natural ecosystem development over an extended period of time. [13]

Rehabilitation: The establishment of a stable and self-sustaining ecosystem, but not necessarily the one that existed before mining began. In many cases, complete restoration may be impossible, but successful remediation, reclamation, and rehabilitation can result in the timely establishment of a functional ecosystem.

From what I have read on the EPA's website and in various other articles, wetlands are an extremely important part of the watershed. They hold water in times of drought and flood and could be the difference between life in death for a rural community in future extreme weather fluctuations. They also help maintain atmospheric conditions by storing carbon instead of releasing it. They are hosts for biodiversity akin to coral reefs and

rainforests.

The EPA lays out guidelines for Wetland Restoration here- https://www.epa.gov/wetlands/principles-wetland-restoration I urge you to read it and consider it in your EIS.

If this project at Stibnite is to be approved I would like to know the details of Midas's plan for reclamation. Do they align with the EPA's guidelines for restoring wetlands? Has there ever been a successful wetland restoration of a base and precious metal open pit mine storage site? Will this project restore some parts of the effected Stibnite area while destroying others? How can you measure which of these natural resources is more valuable than the other?