



Wetlands replacement

As with almost any large industrial, commercial, agricultural, public works, or residential project planned in water-rich Minnesota, the disturbance of wetlands is a key consideration. The law requires that any wetlands disturbed as a result of these projects be mitigated or replaced. We have taken numerous steps to avoid and minimize wetland impacts by re-using existing infrastructure (including an existing tailings basin and plant site from legacy iron ore mining at our project site), and by relocating project features, where possible. Even so, our mine plan ensures there is no net loss of wetlands and that we meet our legal and moral obligations to replace wetlands and protect the environment.

How many acres of wetlands will PolyMet disturb?

PolyMet Mining's NorthMet Project is estimated to directly impact approximately 900 acres of wetlands.¹ This primarily is in the forested area where the pits and stockpiles will be located and represents less than 5 percent of the total project land size of 19,000 acres. By law, for every acre we disturb, we must replace it with equal or more wetlands.² As a precaution, wetlands in the area that have been identified as having *potential* to be indirectly affected by the project will be continually monitored. If any indirect effects are detected, these, too, would be mitigated or replaced as part of our plan and to comply with the law.

What government agencies regulate wetlands?

The U.S. Army Corps of Engineers has federal jurisdiction (Section 404 of the Clean Water Act) and the Department of Natural Resources (Minnesota Wetlands Conservation Act) and Pollution Control Agency (Section 401 of Clean Water Act) have state jurisdiction over wetland impacts, and these agencies will determine final mitigation requirements as part of their respective permitting processes.

What is PolyMet's wetland replacement plan?

The plan that PolyMet submitted to these three agencies (above) as part of its Permit to Mine application outlines how PolyMet will implement all of the standards and requirements of a wetland replacement plan. This includes strategically locating mine features such as waste rock stockpiles, haul roads, water management systems and other elements of the infrastructure to avoid or minimize wetland effects. The reuse of existing structures such as the four-square-mile tailings basin and plant site also figure prominently in the plan so as to avoid disturbing additional lands.

Where are PolyMet's proposed replacement wetlands located?

The company has secured properties outside of the project boundaries to serve as mitigation sites. In most cases, these properties are former agricultural lands that will be restored as wetlands.

¹ See Final Environmental Impact Statement Exec. Summary at p. 36, § 5.2.3 at p. 5-255, 256 Appendix, p.488. Actual impact is 913.8 acres of wetlands. Depending on the location, type and timing of compensatory mitigation, the minimum required amount of replacement wetlands for direct impacts, based on EPA recommendations, could potentially range from 913 acres up to 1,827.6 acres.

² The basic requirement is "[w]etlands must not be drained or filled, wholly or partially, unless replaced by restoring or creating wetland areas of at least equal public value under a[n approved] replacement plan." Minn. Stat. § 103G.222, subd. 1(a).



The U.S. Army Corps of Engineers has already stated that the mitigation sites identified by the company would be acceptable for use in compensating for direct wetland losses.³

How many replacement acres of wetlands will the company be required to provide?

The actual number of replacement acres of wetlands will be determined during the permitting process. The ratio will be determined based on the type and quality of the wetlands being disturbed and those offered as mitigation properties. The timing of wetland replacement is another important factor in evaluation of the required replacement ratio, with wetland mitigation ideally replacing wetlands ahead of or in time with the loss of wetlands by the project. At a minimum, replacement acres will equal the approximately 900 acres identified as being directly impacted by the project. Again, the goal of the wetland regulation is a no-net-loss of wetlands.

Are the private lands that are part of the proposed land exchange with the U.S. Forest Service factored into the company's wetlands mitigation plan?

No. However, as a result of the proposed land exchange, which has been authorized by the Forest Service, the federal estate will see a 505-acre net increase in wetlands.

Download a DNR [fact sheet on wetlands](#).

³ See FEIS § 5.2.3 at p. 5-256, Appendix, p. 488.