Summary of NorthMet Project Modifications since Publication of the SDEIS

The St. Paul District issued a Supplemental Public Notice of PolyMet Mining Inc.'s application for a permit to discharge fill material into wetlands adjacent to the Partridge and Embarrass Rivers on December 13, 2013. Concurrent with that notice, the Co-lead agencies published a Supplemental Draft Environmental Impact Statement (SDEIS) for PolyMet's NorthMet Mining Project. Since that time, PolyMet has continued
1 to update its environmental information and project description in response to agency input and public comment.

The St. Paul District is issuing the present Supplemental Public Notice as a courtesy, to make certain that the public has an opportunity to examine and comment on changes to the NorthMet Project. Updated information about the NorthMet Project can be found in the Final Environmental Impact Statement (FEIS), available at [website], as well as in PolyMet's updated management plans, data packages, and 404(b)(1) Evaluation, all of which are available at [website]. Some of those changes are summarized briefly below.

The FEIS documents changes to the Plant Site Project Area that are being incorporated into the Project for
2 the Final EIS. These changes included the addition of engineering controls, result in an increase of 1.37 acres of direct wetland impacts. These engineering controls have been incorporated to improve water
3 quality. Other changes include updating the references from SDEIS to FEIS, updates in the Project schedule, updates in the terminology for Project components, and changes to other Project details.

Potential indirect impacts to wetlands were recalculated in the FEIS based on reclassifying all bog
4 communities within the 0 to 1,000-ft analog zone from the "no effect" category to "low likelihood"
5 category of wetland hydrology effects. In addition, wetland fragments were defined based on the following criteria: change in the size of remaining wetland, wetland type, source of hydrology, direction of flow in the area, location in the current watershed, location in the future watershed, and connectivity to other wetlands. Potential indirect wetland impacts increased from 70.7 acres based on using the method of wetlands within the analog impact zones to 343.5 acres based on using the method of wetlands within the analog impact zones.

Based on additional review and refinement of the mitigation site plans, there has been a decrease of 51.7
6 acres of mitigation credits available from the three proposed mitigation sites. Proposed wetland mitigation for direct impacts using USACE credits would require an increase of 83.2 credits, resulting in a decrease of the total surplus wetland mitigation credits by 144.9 credits. Proposed wetland mitigation for direct impacts using WCA credits would require an increase of 2.1 credits, resulting in a decrease of the total surplus wetland mitigation credits by 51.7 credits. Post-closure establishment of 101.8 acres of wetland on-site would likely occur during reclamation of the Mine Site; however, this establishment is not included in the mitigation credits as credit is not being requested at this time. The generation of wetland credits in on-site areas has the potential to be used on a contingency basis, but compensatory credit would not be considered at this time for a variety of reasons including the fact that any restoration efforts would not occur for many years.

Updates to Protected Plant and Wildlife Resources include addition of information pertaining to the
7 northern long-eared bat following that species' April 2015 listing as a federally-threatened species and
8 changes to the status of state-listed species following the MnDNR's August of 2013 update to

Minnesota's list of endangered, threatened, and special concern species. A Biological Assessment was prepared and the USACE provided it to the USFWS as part of the Section 7 consultation process.

9 Updates to Archeological, Historical, and Cultural Resources are being documented during the on-going Section 106 consultation process, and will be memorialized in a Memorandum of Understanding (MOU) for the Project.

From: Jennifer Saran <jsaran@polymetmining.com>
Sent: Wednesday, October 28, 2015 10:33 AM
To: 'Augustin, Ralph J MVP'
Subject: RE: source (UNCLASSIFIED)

Hi Ralph,

The paragraph in the write up that we sent to you should be modified into 2 paragraphs. The concepts were mixed up in the paragraph and the acreages were not correct - they are now correct and the source of data is cited (below):

4 Potential indirect impacts were recalculated based on reclassifying all bog communities within the 0 to 1,000-ft analog zone from the "no effect" category to "low likelihood" category of wetland hydrology effects. Likelihood of potential indirect wetland impacts changed from 87.2 acres (Large Table 7; Wetland Data Package v7) based on using the method of wetlands within the analog impact zones to 233.5 acres (Large Table 7; Wetland Data Package v11) based on using the method of wetlands within the analog impact zones.

5 Wetland fragments were defined for the analysis based on the following criteria: change in the size of remaining wetland, wetland type, source of hydrology, direction of flow in the area, location in the current watershed, location in the future watershed, and connectivity to other wetlands.

Please let me know if you have any other questions - thanks!
Jennifer

-----Original Message-----
From: Augustin, Ralph J MVP [mailto:Ralph.J.Augustin@usace.army.mil]
Sent: Wednesday, October 28, 2015 9:26 AM
To: Jennifer Saran <jsaran@polymetmining.com>
Subject: source (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

In your write up where did you get these numbers?

As a result of this change potential indirect impacts to ombrotrophic bogs increased from 70.7 acres based on using the method of wetlands within the analog impact zones to 343.5 acres based on using the method of wetlands within the analog impact zones.
CLASSIFICATION: UNCLASSIFIED