



MINNESOTA DIVISION IZAAK WALTON LEAGUE OF AMERICA

2233 University Avenue West, Suite 339 • Saint Paul, MN 55114 • 651.221.0215

ikes@minnesotaiakes.org • www.minnesotaiakes.org

December 22, 2015

Regulatory Branch St. Paul District
U. S. Army Corps of Engineers
180 Fifth Street East, Suite 700
Saint Paul, MN 55101-1678

Re: PolyMet-NorthMet Section 404 Permit

We are submitting these comments on behalf of the Izaak Walton League of America Minnesota membership on the proposed issuance of a Clean Water Act 404 permit to allow destruction of wetlands by the PolyMet corporation. Izaak Walton League members are “Defenders of Soil, Air, Woods, Waters and Wildlife” – and we take this mission seriously. Collectively, our membership has poured many hundreds of hours into analyzing this PolyMet mine plan, including thousands of pages of related documents over many years.

We come to the inescapable conclusion that this is the wrong company with the wrong plan for mining this mineral deposit. We submitted detailed comments to the Supplemental Draft EIS objecting to the immense destruction and degradation of wetlands proposed in this plan.

There seems to be a stubborn unwillingness to consider practical mining practices, such as underground mining, that would reduce the damage to wetlands from the absolutely unacceptable levels proposed in this mine plan. Cost alone should not rule out these practices! The minerals should be left in the ground until they can be accessed by future generations without such widespread natural resource destruction.

We object to the issuance of a 404 permit to PolyMet Corporation for their NorthMet mine project, because:

- PolyMet’s proposed mitigation is insufficient and inadequate for the scale of wetland destruction they propose. More than 2/3rds of the proposed mitigation occurs outside the affected watershed. The types of wetlands lost are not the types of wetlands to be restored, lost wetland functions are NOT being mitigated.
- PolyMet does not propose specific mitigation for the potential loss of thousands of additional wetland acres due to partial or complete drainage. It is unacceptable to propose a permit for this mine without a complete understanding of wetland mitigation.
- PolyMet proposes the single largest permitted loss of wetlands in Minnesota history. The high quality wetlands in questions cannot be mitigated or replaced either in type or in the watershed. This permit should be denied as too damaging to the public interest in clean water.

Thank you for the opportunity to comment. We hope you take our comments to heart and withdraw the proposed PolyMet Section 404 Permit.

Sincerely,

Barry Draskowski
President

Izaak Walton League of America – Minnesota Division

Mission Statement of the Izaak Walton League of America

To conserve, restore, and promote the sustainable use and enjoyment of our natural resources, including soil, air, woods, waters, and wildlife.