SUMMARY TABLE
Public Scoping Comments for PolyMet
October 25, 2005

AIR QUALITY		
AQ – 1	Traffic minimization should be included in BACT analysis	EPA
AQ – 2	Paved roads and unpaved roads should be identified.	EPA
AQ – 3	EIS should describe is material transfer points in crushing equipment have enclosures to minimize airborne dust.	EPA
AQ – 4	EIS should clarify is drilling equipment will have dust collection systems.	EPA
AQ – 5	Include calculations used to determine air emission control efficiencies, as well as potential-to-emit figures in Tables 23-2 and 23-3.	EPA
AQ – 6	If Rainbow Lake Wilderness is the wilderness in the Chequamegon, it would be more than 90 miles to the east.	USFS
AQ – 7	It will be important to gathering applicable test data on point source process plant emissions so that particulate matter can be properly speciated in the dispersion model.	USFS
AQ – 8	What analysis or data was used to determine "emissions from criteria pollutants are not a significant issue." And "Class I area impacts are expected to be minimal…" The document acknowledges that these issues have not been investigated.	USFS
AQ – 9	EIS should address air impacts irrespective of the NAAQS.	MCEA, NWF
AQ – 10	EIS should evaluate impacts from CO_2 emission both for the project and cumulatively.	MCEA
AQ – 11	EIS should include explanation	NWF, Sierra Club

	and data to support reported low mercury emissions.	
AQ – 12	EIS should include an assessment of impacts to human health.	FBWCA, Fern Arpi
AQ – 13	Mine equipment should be included in vehicle related air emissions.	Sierra Club
AQ – 14	EIS should include evaluation of PM_{10} impacts	Sierra Club
AQ – 15	Public involvement in Class I air modeling	Sierra Club
AQ – 16	Proposes additional materials to be included in source-specific air dispersion modeling.	Sierra Club
AQ – 17	Include fibers and mercury in Class I and Class II increment analysis	Sierra Club
ALTERNATIVES		
ALT – 1	An alternative addressing additional sites, technologies and magnitude or scale of the project needs to included in the EIS.	MCEA, NWF, FBWCA, Fern Arpi, Sierra Club, Elanne Palcich, Fond du Lac
ALT – 2	Concern that statements about considering mitigation measures suggested through public comments preclude independent mitigation measures by federal and state agencies.	MCEA
ALT – 3	Concern about purpose and need statement being narrowly construed to prevent consideration of alternatives.	Sierra Club
ALT – 4	Provide comparison of environmental impacts and employment to no action alternative.	Sierra Club
ALT – 5	Is the project as proposed an alternative under consideration?	Sierra Club
ALT – 6	Concern about lack of identification of specific wastewater treatment technology alternatives. Cost of	Sierra Club

	treatment need to be included.	
ALT – 7	EIS should include Technical Design Evaluation Reports for design failure mitigation response, noise, odors, and post-mining reclamation	Sierra Club
ALT – 8	Proposed additional modified design or layout alternatives for mine pit, tailings basin, waste rock stockpiles, mine site reclamation, ore transportation, and wastewater	Sierra Club, LeRoger Lind, USFWS
ALT – 9	Proposed mitigation measures and concerns about developing and determining suitability of mitigation measures so early in the process.	Sierra Club
ALT – 10	No action alternative is preferred	Elanne Palcich
BLASTING		
B – 1	Need to evaluate potential effects on blasting	EPA
CULTURAL RESOURCES		
CR – 1	Failure to identify 1854 ceded territory. Need to add Tribal impacts to Scope of EIS	EPA, MCEA, 1854 Authority, NWF, Fond du Lac
CR – 2	Where and what is “Knot Camp”?	EPA
CR – 3	All resources in the area of potential effect need to be evaluated for National Register eligibility.	SHPO, Sierra Club
CR – 4	Concern about impacts to Superior NF and BWCA	James Mohler
CUMULATIVE EFFECTS		
CE – 1	Geographic scope of mercury deposition should include receptor areas outside of Minnesota.	EPA
CE – 2	Inclusion of potential sulfur and nitrogen deposition in Class I Areas.	EPA
CE – 3	Cumulative effects analysis of the Embarrass and Partridge Rivers should include discharges from existing and reasonably foreseeable sources.	EPA

CE – 4	Cumulative effects analysis of wildlife habitat should include "habitat barrier effect" of linear development along the iron range.	EPA
CE – 5	Evaluation of 303d listing and potential TMDL due to project related impacts that could cause water quality-based land use limitations.	USFS
CE – 6	Potential affects from deposition of sulfates, nitrates, and mercury to low buffering capacity aquatic or terrestrial ecosystems is not limited to just federally administered Class I Areas.	USFS, NWF
CE – 7	The USFS would like to review preliminary reports and provide data on the Class I Increment, Acidification, Mercury and Visibility analysis.	USFS
CE – 8	Use of State Timber Harvest GEIS in cumulative effects analysis of wildlife habitat	MCEA
CE – 9	Proposed analysis is incomplete with respect to reasonably foreseeable projects.	MCEA, Sierra Club, LeRoger Lind, Fond du Lac
CE – 10	Cumulative analysis should evaluate impacts to all plant species in addition to threaten and endangered species.	MCEA
CE – 11	Cumulative analysis on wildlife habitat should include impacts to boreal owls and lynx.	MCEA, Sierra Club
CE – 12	Concern about cumulative impacts to wetlands	Fond du Lac, USFWS
CE – 13	EIS should include cumulative impacts to traffic	Sierra Club
CE – 14	EIS should include cumulative impacts to traffic	Sierra Club
CE – 15	Cumulative impact analysis to wildlife habitat should include habitat degradation from pollution.	Sierra Club
CE – 16	Suggested change to geographic scope and	Sierra Club

	approach to analysis of cumulative socio-economic analysis.	
ENVIRONMENTAL REVIEW		
ER – 1	Need to document compliance with NEPA Scoping requirements.	Sierra Club
ER – 2	Is there an appeal process for scoping decisions?	Sierra Club
ER – 3	EQB rules require listing of alternatives to be considered in Scoping EAW.	Sierra Club
ER – 4	Displeased with format for public meeting	Sierra Club
ER – 5	Permit applications and draft permits should be included in the EIS	Sierra Club
ER – 6	Request for additional time to review Draft EIS	Debby Ortman
ER – 7	Concern about time allowed to review documents and provide comments.	Elanne Palcich
EROSION AND SEDIMENTATION		
ES – 1	Question on the classification of erosion and sedimentation as a minor issue.	EPA, James Mohler, Sierra Club
FISH AND WILDLIFE		
FW – 1	Additional detail about surveys that have been conducted	EPA
FW – 2	Additional detail about the One Hundred Mile Swamp	EPA
FW – 3	Proposed action may reduce habitat of Management Indicator Species (e.g. northern goshawk).	USFS
FW – 4	Need to include non-native invasive species in fish and wildlife section.	USFS, FBWCA
FW – 5	EIS should include information on sensitive species, species of concern, and other important species.	USFS, MCEA, 1854 Authority, Elanne Palcich
FW – 6	EIS should include information on formal ESA consultation	MCEA, FBWCA, USFWS
FW – 7	Increasing “edge” effects can be a significant habitat fragmentation impact.	MCEA, FBWCA

FW – 8	Use of Range of Natural Variability should be considered as a tool to assess habitat impacts.	MCEA
FW – 9	What potential water quality impact to local fisheries	Fern Arpi
FW – 10	Suggest use of studies on wolf and lynx as rare biodiversity areas, including addition surveys for rare plants and animals.	Sierra Club
FW – 11	EIS needs to evaluate impacts to the wood turtle	Leonard Anderson
INFRASTRUCTURE AND PUBLIC SERVICES		
IPS – 1	EIS should include information on whether workforce will be local or migrate into the area, and any resulting impacts to public service and infrastructure.	EPA, Sierra Club
IPS – 2	EIS should evaluate additional infrastructure needed to provide power to the project.	Sierra Club
LAND USE		
LU – 1	Additional information on U.S.F.S. management of proposed mine area	EPA, USFS, MCEA, James Mohler, FBWCA, Sierra Club
LU – 2	Concern about compatibility with St. Louis Count Land Use Plan, Forest Resource Council Plan, and Water Conservation District Plan.	James Mohler
MINELAND RECLAMATION		
MR – 1	Mitigation of lost reclamation on tailings basins	EPA
MR – 2	Examples of reclamation for reactive material	EPA
MR – 3	Additional detail on financial assurance	EPA, MCEA, NWF, Fern Arpi, Sierra Club, Leonard Anderson
MR – 4	EIS should account for assumptions, uncertainty, and mistakes with appropriate monitoring and contingency plans.	NWF, Sierra Club, LeRoger Lind, Clyde Hanson
MR – 5	Scoping document should reference state standards and design goals for stormwater	Sierra Club

	and sulfide mining	
MISCELLANOUS		
MISC – 1	Definition of terms used (e.g. waste rock stockpiles, reasonably,minimize)	EPA, Sierra Club
MISC – 2	Ground disturbing activities may quicken the spread of invasive species.	USFS
MISC – 3	Concern about PolyMet as exploration company as it relates to the plan's economic viability and the company's ability to be answerable to the state and its citizens in the future. Cost and responsibility for environmental damages.	Lori Andersen, Elanne Palcich
MISC – 4	Concern about state government having a conflict of interest with respect to the project.	Lori Anderson, anonymous, Sierra Club
MISC – 5	General concern about cumulative impact, international ramifications, historical/cultural resources, odors, toxic metals, proprietary process chemicals, acid mine drainage, water recreation, autoclave process and air emissions.	1854 Authority, Fern Arpi, Sierra Club, Leonard Anderson, Elanne Palcich, Clyde Hanson
MISC – 6	Support of project	Tritec, Nelson-Williams, City of Hoyt Lakes, Edward Addy, James Watson
MISC – 7	EIS should include additional information about the presence of asbestiform fibers.	NWF, FBWCA, Fern Arpi, Sierra Club, LeRoger Lind
MISC – 8	Concern about USACE Section 404 public notice or request for public hearing on permit	Fond du Lac, FBWCA, Sierra Club, EPA, USFWS
MISC – 9	Concern about ethical use of technology	Fern Arpi
MISC – 10	Concern about continued production of hazardous substances rather than using products from mining to help solve problems created by hazardous substances.	Fern Arpi
MISC –11	Question about PolyMet being	Fern Arpi

	a subsidiary company and its track record in the western united states.	
MISC – 12	What is the cost/benefit relationship for the project with respect to human/environmental impacts and economic gain	Fern Arpi
MISC – 13	What intellectual or creative forces will decision makers use to inform their decisions?	Fern Arpi
MISC – 14	How will the findings of the 1979 Regional Copper-Nickel Study be used?	Fern Arpi
MISC – 15	How much will be paid to landowners for leasing the land?	Fern Arpi
MISC – 16	Concern about vague terms in purpose and need statement	Sierra Club
MISC – 17	Concern about residents in Northern Minnesota not being aware of the hazards associated with sulfide mining.	Debby, Ortman
MISC – 18	Concern about agency staff not having enough experience in sulfide mining operations	Debby Ortman
MISC – 19	EIS should include evaluation of New Zealand standards performance for non-ferrous mining	LeRoger Lind
MISC – 20	Concern about use of old LTV buildings	Elanne Palcich
MISC – 21	Concern about using old mining techniques to enter a new world market.	Elanne Palcich
NOISE		
N – 1	How will noise be addressed in the EIS?	EPA, Sierra Club, Elanne Palcich
PERMIT TO MINE		
PTM –1	Concern about deferring evaluation of impacts to permitting.	EPA
SOLID WASTE		
SW – 1	Structural Stability of existing tailings basins	EPA
SW – 2	Current water quality from buried hornfels in Cell 2W.	EPA

	Will future discharge to monitoring wells be attributable to buried hornfels or PolyMet operations?	
SW – 3	Identification of nuclear-containing devices that will be disposed of as part of mine closure.	EPA
SW – 4	What is the source of contamination for railroad ballast?	EPA
SW – 5	Additional characterization of non-reactive waste rock, reactive waste rock, lean ore, tailings and reactive residue.	EPA, FBWCA, Sierra Club, LeRoger Lind, Elanne Palcich, Clyde Hanson
SW – 6	Provide estimate of de-mineralization sludge that will be generated	EPA
SW – 7	Include information on explosives	EPA
SW – 8	Dust from haul roads and rail line should be considered reactive	Sierra Club
SW – 9	Will results of pilot test be the same at project scale?	Sierra Club, LeRoger Lind
TRAFFIC		
T – 1	EIS should include more specific information on traffic impacts of the project	EPA
VISIBILITY		
V – 1	Need additional information on lighting impacts	EPA, Leonard Anderson, Elanne Palcich
V – 2	Visibility impacts to recreation on Partridge River should be included in the EIS	Sierra Club
WATER QUALITY		
WQL – 1	Concern about limited data to characterize the background water quality data	EPA
WQL – 2	Concern about statement that current water runoff from the site is likely similar to overall quality of Partridge River, when site is undeveloped forest and the Partridge River is influenced by mining activities.	EPA
WQL – 3	Identification of water quality	MCEA

	standards and requirements must be included in the EIS.	
WQL – 4	Nondegradation analysis must be included	MCEA
WQL – 5	Additional information on discharges from the tailings basin, including potential to expand beyond 20-year proposal.	MCEA
WQL – 6	EIS must address probability of a variance to the mercury standard and impacts to mercury discharges.	MCEA, Sierra Club, Leonard Anderson, LeRoger Lind
WQL – 7	EIS must include information on alternative use of existing wastewater treatment plants.	MCEA
WQL – 8	EIS must include information and impacts to downstream waters related to sources of reactive and nonreactive runoff and information on collection systems.	MCEA, 1854 Authority, FBWCA, Fern Arpi, Leonard Anderson, Elanne Palcich, Clyde Hanson
WQL – 9	EIS should address water quality of pit lake after it fills, including pot-closure monitoring.	MCEA, Sierra Club
WQL – 10	EIS should evaluate increase sulfate leading to methylation of mercury.	1854 Authority
WQL – 11	EIS should include discussion of impaired water status of receiving waters,	Sierra Club
WQL – 12	EIS should include groundwater impacts from mine site and tailings basin.	Sierra Club
WQL – 13	EIS should include bioaccumulation of toxic metals.	Sierra Club, Leonard Anderson
WATER QUANTITY		
WQN – 1	Predictions of mine pit inflow should receive close attention	EPA
WQN – 2	Impact of pit dewatering on groundwater table	MCEA, Sierra Club
WQN – 3	Mine site drainage patterns need to reestablish natural flow patterns to protect aquatic resources	Leonard Anderson

WETLANDS		
WET – 1	Must characterize entire wetland impact of project. Concern about proposal of 5-year cycle for evaluation of wetlands.	EPA, MCEA, 1854 Authority, NWF, Fond du Lac, Howard Heath, FBWCA, Sierra Club, Leonard Anderson, Elanne Palcich, Clyde Hanson, John Finnegan, Glada Kerneen, USFWS
WET – 2	Include evaluation of indirect wetland impacts	EPA, Fond du Lac
WET – 3	Concern about ability to mitigate any wetland impacts.	K & R Winkler
WET – 4	Mitigation strategy should include financial payments to state/county for wetland enhancement	James Mohler
WET – 5	Loss of wetland soils	Sierra Club