August 24, 2026

Commissioner Sarah Strommen
General Counsel Jean Coleman
Minnesota Department of Natural Resources
500 Lafayette Road
St. Paul, Minnesota 55155

SENT VIA ELECTRONIC MAIL

Executive Director Catherine Neuschler
Minnesota Environmental Quality Board
520 Lafayette Road
St. Paul, Minnesota 55155

RE: NewRange Project Summary NorthMet Mine - Appropriate Environmental Review

Dear Commissioner Strommen, Ms. Coleman, and Ms. Neuschler:

WaterLegacy, the Minnesota Center for Environmental Advocacy ("MCEA"), and the Fond du Lac Band of Lake Superior Chippewa (the "Band") appreciate the prompt response made by the Minnesota Department of Natural Resources ("DNR") to MCEA's Data Practices Act request for materials provided by NewRange Copper Nickel LLC ("NewRange") to DNR on July 29, 2026. These documents summarizing NewRange "Primary Project Changes" ("NewRange Summary"), are provide as Attachment A. NewRange's 404 Permit Application from July 2026, published by the Army Corps of Engineers on August 13, 2026 ("404 Application"), provides additional details about NewRange's proposed Project. The application is publicly available and can be found at: https://www.mvp.usace.army.mil/Missions/Regulatory/NorthMet/. As we describe further, these documents make clear that NewRange is, in reality, making an entirely new proposal for the mining and storage of mine waste, which relies on significant new infrastructure at or near the LTVSMC tailings basin. We respectfully request a response in writing.

We understand from the documents received from DNR that NewRange is requesting that DNR prepare a Supplemental EIS to study elements of its new Project design. From the outset, we note that NewRange is a new entity, created in 2023, that was not part of the prior environmental review or permitting proceedings on the permit to mine application submitted by Poly Met Mining Inc. ("PolyMet"). Thus, there remain significant questions regarding NewRange's ability to step into the shoes of PolyMet for any review or proceedings related to any application PolyMet earlier submitted. In any event, based on our reading of applicable statutes and rules, the appropriate process for environmental review is for the DNR to prepare an EIS for the NewRange proposed Project, pursuant to Minn. Stat. § 116D.04, subdivisions 2a and 2b and Minn. R. 4410.4400, subp. 8(B), because NewRange is proposing to construct three new facilities, that do not currently exist, for the storage of tailings that would be produced by its newly-proposed Project.

Environmental Quality Board ("EQB") rules state that an EIS is mandatory "for construction of a new facility for mining metallic minerals or for the disposal of tailings from a metallic mineral mine." Minn. R. 4410.4400, subp. 8(B). Based on the NewRange Summary and

404 Application, an EIS is mandatory, since project changes will include three new tailings storage facilities ("TSFs") that currently do not exist:

1. "Tailings managed in the TSF south of the processing plant within the Plant Site. The TSF includes filling four former mine pits with low sulfur tailings and will result in a TSF with raised embankments utilizing centerline dam construction to contain tailings over former minelands and a former railroad embankment." NewRange Summary at 6.

2. "Whole tailings deposited into one former mine pit until capacity reaches the pit rim (in-pit TSF). While fine tailings are deposited in the remaining three mine pits, centerline embankments are constructed using coarse tailings." *Id*.

3. "Excess high sulfur tailings that cannot be disposed offsite would be stored in a separate LTSF [lined TSF] constructed over the existing LTVSMC Emergency Basin." *Id*.

The 404 Application provides further details about NewRange's proposed new TSFs and LTSF, which have never been studied or evaluated as part of prior proposals:[1]

1. **Location.** NewRange proposes constructing two new TSFs, in four former mine pits, over former mine lands and railroad embankments to the south of the existing LTVSMC tailings basin. *See* 404 Application, at 4, 18 (noting that PolyMet's previous proposal for storing tailings included a flotation tailings basin on top of the existing LTVSMC tailings basin).

2. **Dam Design.** NewRange proposes a new dam to contain tailings at the two new TSFs in the form of "a raised embankment" that would be built using "centerline dam construction to contain tailings." 404 Application, at 18. PolyMet's earlier proposal called for tailings to be contained by upstream dams, to be built in a series of "lifts" on top of the existing LTVSMC tailings basins.

3. **Water Management Plan at Existing Pits.** NewRange proposes dewatering the four former mining pits before depositing tailings in each pit. *See* 404 Application, at 18. This would include a "water management system, including ditching and ponds . . . to limit the water inflows into the pits from surrounding aquatic resources." 404 Application, at 18. PolyMet never made such a proposal in its earlier Project mining and reclamation plan.

4. **Closure Plan.** In the 404 Application, NewRange proposes a coarse tailings cap and dry closure for the new TSFs. *See* 404 Application, at 4, 18. Earlier, PolyMet had proposed wet closure including a standing pond, saturated tailings, and application of a bentonite layer. Clearly, these new TSFs will involve entirely new closure and reclamation techniques, employed at totally new locations.

[1] Additional relevant details about the TSFs may come to light as more information becomes available, and we reserve the right to submit additional letters or comments to you regarding those details.

5. **TSF Seepage Management System.** The 404 Application includes a new proposed seepage management system south of the LTVSMC tailings basin that "will consist of a series of ditches and ponds that will cut off water flowing into the pits and dams, and cutoff trenches to cutoff water flowing out of the TSF to groundwater." 404 Application, at 21. Unlike the PolyMet plan, NewRange does not propose any new seepage management for the LTVSMC facility.

None of the above-listed features were part of the Project proposal. DNR did not study them in the FEIS for PolyMet's proposed Project and they were not considered in permitting. Previous studies, modeling, and evaluation of impacts from the storage of tailings at the LTVSMC basin are not applicable to NewRange's proposed Project. Entirely new studies must be completed to understand the environmental impacts of the current proposal, and this should not be conducted in a piecemeal manner.

For example, these new tailings disposal facilities will each require new stability analysis as well as analysis of impacts to water quality and quantity. New Range Summary at 3-5. As described above, NewRange proposes to build new dams, which may be classified under Minn. R. 6115.0340 as Class I dams due to their proximity to Wyman Creek, a designated trout stream upstream of the Colby Lake drinking water source for the City of Hoyt Lakes as well as their proximity to Second Creek, a wild rice water impaired due to excessive sulfate. Figures 8-9, and 11 of the U.S. Army Corps of Engineers Public Notice No. 1999-05528 for the NewRange Section 404 Application (Aug. 13, 2026) ("USACE Notice"), provided in Attachment B, shows the locations of the proposed TSFs, tailings dams, and proximate waters. EQB rules require a mandatory EIS for construction of any Class I dam. Minn. R. 4410.4400, subp. 18.

Other features of the new NewRange proposed Project also require an EIS due to their potential for significant environmental effects. The NewRange proposed Project would process 40,000 tons per day of ore, increasing the level of production proposed by PolyMet by 25 percent, or by 2,920,000 tons per year. New Range Summary at 2. The NewRange proposed Project would decant untreated tailings contact water to Pit 3, which overflows into Wyman Creek, a designated trout stream upstream of Hoyt Lakes drinking water. *Id*. at 6. The NewRange proposed Project would store waste rock on dozens if not hundreds of acres of shallow marsh, which are class 3 wetlands, designated as public wetlands under Minn. Stat. § 103G.005, subd. 15a. Finally, the newly proposed NewRange Project would directly impact 1,145 acres of wetlands, USACE Notice at Fig. 10, as contrasted with 903 acres of direct impact on wetlands previously proposed by PolyMet.

Although more details may become available, and new grounds for an EIS may become obvious in the future, we note that Minn. R. 4410.4400, subp. 8(B) unambiguously requires a new EIS for construction of new facilities for the disposal of tailings from a metallic mineral mine. NewRange proposes such new facilities. We understand the DNR intends to respond to the request by NewRange for a supplemental EIS within approximately one month. We respectfully request that the DNR instead determine that the NewRange Project Changes require an EIS, rather than the supplemental EIS as NewRange has requested.[2]

[2] We reserve the right to assert additional grounds for an EIS for the proposed NewRange Project.

We believe that, once DNR has received detailed information from NewRange sufficient to support scoping of an EIS, DNR's next step should be to prepare for public comment either a draft scoping EAW or a draft alternative scoping document pursuant to Minn. R. 4410.2100. This will ensure a more efficient, clear process. As a practical matter, without a new EIS, it will be difficult to tell which pieces of the former EIS remain in place and which are suspended and superseded by the SEIS for the purposes of any permit(s) that may be issued or denied. Beginning with a new EIS not only complies with the law but promotes clarity in the permitting process for all parties.

Thank you for your consideration.

Sincerely yours,

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ATTACHMENT A

NEWRANGE COPPER NICKEL

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July 29, 2026

Commissioner Strommen
Minnesota Department of Natural Resources
500 Lafayette Road
St. Paul, MN 55155

Re: Request to Supplement a Final Environmental Impact Statement

Dear Commissioner Strommen:

In accordance with Minnesota Rules, part 4410.3000, subpart 4, NewRange Copper Nickel LLC is requesting a supplement to the Minnesota Department of Natural Resources (MDNR), United States Army Corps of Engineers (USACE), and United States Forest Service (USFS) prepared joint state and federal Environmental Impact Statement (EIS) for the NorthMet Mining Project consisting of the proposed copper-nickel-platinum group elements (PGE) mine and former LTVSMC processing facilities and tailings basin in northeastern Minnesota. The joint EIS was completed in November 2015 in accordance with the provisions of the National Environmental Policy Act (NEPA; 42 U.S.C. 4321-4347) and the Minnesota Environmental Policy Act (MEPA; Minn. Stat. Ch. 116D).

The proposed project includes changes associated with the production rate, ore conveyance, and the management of tailings, water, and land area. NewRange is requesting a Supplemental EIS so that MDNR can evaluate the proposed changes and their potential environmental effects through the state environmental review process. The project remains subject to governmental decisions and has not been completed; accordingly, NewRange understands that the exemption in Minnesota Rules, part 4410.4600, subpart 2 does not apply.

To support MDNR in reaching its decision within 30 days after receipt of this notice, NewRange has provided a copy of this request to the Minnesota Environmental Quality Board and included a draft preparation notice for MDNR's consideration in determining the schedule, issues, and scope of analysis for the Supplemental EIS.

We look forward to working with MDNR through its review and decision process. Please direct questions or requests for supplemental information regarding this request to me or to Christie Kearney, P.E., Environmental and Permitting Manager. Christie will serve as NewRange's primary point of contact for the request and will coordinate NewRange's responses to agency questions and requests for supplemental information. Christie may be reached at christie.kearney@newrangecoppernickel.com or 218-461-7746.

Sincerely,

Tannice McCoy

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Attachments

cc: Minnesota Environmental Quality Board
Jess Richards (MDNR), Caroline Oswald (MDNR), Bill Johnson (MDNR)

NewRange Copper Nickel LLC
NorthMet Mining Project
Supplement to Final Environmental Impact Statement
Preparation Notice – July 2026

I. Title of Environmental Impact Statement Being Supplemented and Dates of Completion

Final Environmental Impact Statement, NorthMet Mining Project and Land Exchange, Babbitt and Hoyt Lakes, Minnesota, completed November 2015.

II. Description of Situation Necessitating Preparation of the Supplement

The Minnesota Department of Natural Resources (MDNR), United States Army Corps of Engineers (USACE), and United States Forest Service (USFS) prepared a joint state and federal Environmental Impact Statement (EIS) for Poly Met Mining, Inc.'s (PolyMet) proposed copper-nickel-platinum group elements (PGE) mine and former LTV Steel Mining Company (LTVSMC) processing facilities and tailings basin in northeastern Minnesota. The joint EIS was completed in November 2015 in accordance with the provisions of the National Environmental Policy Act (NEPA; 42 U.S.C. 4321-4347) and the Minnesota Environmental Policy Act (MEPA; Minn. Stat. Ch. 116D).

PolyMet's original NorthMet Project involved mining copper-nickel-PGE and processing to produce copper concentrate and nickel concentrate final products.

On November 1, 2018, the MDNR issued the permit to mine and other state permits for the NorthMet Project. On December 20, 2018, the Minnesota Pollution Control Agency issued its state permits, and on March 21, 2019, the USACE issued the Clean Water Act Section 404 permit. In 2021, the USACE suspended the project's Clean Water Act Section 404 permit and rescinded the permit on June 6, 2023. Following a conversion and name change under Minnesota Statutes §§ 302A.682-692 in February 2023, Poly Met Mining, Inc. is now NewRange Copper Nickel LLC (NewRange). NewRange is "for all purposes the same entity that existed before the conversion." Minn. Stat. § 302A.691, subd. 1. Thereafter, on February 15, 2023, Teck American Inc. and PolyMet US, Inc., a wholly owned subsidiary of PolyMet Mining Corp., formed an independent joint venture, each owning 50% of NewRange. On November 7, 2023, PolyMet Mining Corp. became a wholly owned subsidiary of Glencore.

To address concerns raised during the previous permitting processes and to enhance environmental safeguards and operational performance, the NorthMet Project design has been modified, and NewRange has developed a revised mine plan. The key changes include:

- Relocation and redesign of the tailings storage facility (TSF)
- Updates to water management and water treatment
- A change in ore conveyance from rail to conveyor between the Mine Site and Plant Site
- Revisions to the mine plan layout
- Increase in production capacity from 32,000 short tons per day (stpd) to 40,000 stpd, reducing mine life from 20 years to 16 years

These principal changes are summarized in more detail in Table 1 and are compared against the final 2015 NorthMet EIS (FEIS) action and permitted NorthMet Project designs. Figures 1 through 3 show the project changes as compared to the 2015 FEIS design.

On May 25, 2023, the Supreme Court of the United States narrowed the definition of water of the United States in *Sackett v. EPA*, which will affect the scope of the review of federally jurisdictional wetlands subject to 404 permitting requirements by the USACE. The USACE has selected to complete the NEPA review process as a standalone federal review. The NorthMet Project originally included a land exchange with the USFS, which has been completed and would no longer be part of the NEPA review.

Because NorthMet mining and processing operations have already been reviewed through the EIS process, State environmental review requirements for NewRange's modified NorthMet Project will be met by preparing a SEIS. With no other federal agency involvement, this State SEIS for the modifications to the originally reviewed NorthMet Project proposed by NewRange will be a state-only environmental review.

III. Scope of Supplement: Alternatives, Issues, and Studies

Minnesota Rules, part 4410.3000, subpart 5, requires the scope of the SEIS to be limited to alternatives, impacts, and mitigation measures not addressed, or inadequately addressed, in the FEIS.

A. Alternatives.

The SEIS will address two alternatives: 1) the new Proposed Action (modified NorthMet Project); and 2) No Action Alternative, which is the original "Proposed Action" evaluated in the FEIS. Because the No-Action Alternative has previously been reviewed in an EIS, the analysis for the SEIS will be limited as described in Section B below.

B. Issues. The SEIS will address the following potential issues:

1. Compatibility with Land Use Plans and Regulations – Changes in compatibility with land use plans and regulations due to alternative tailings siting and alternative ore conveyance.

2. Water Resources – Changes in impacts to water resources (surface water and groundwater) due to alternative tailings siting, including dewatering of former mining pits, and reconfiguration of water management, supply, and water treatment.

3. Wetlands – Changes to wetland impacts due to reconfiguration of mining infrastructure, alternative ore conveyance, and alternative tailings siting.

4. Vegetation – Changes in impacts to vegetation due to alternative tailings siting where vegetative baseline data and impact assessments did not occur.

5. Wildlife – Changes in impacts to wildlife due to alternative tailings siting and use of an overland conveyor with wildlife crossings.

6. Aquatic Species – Changes in impacts to aquatic species due to alternative tailings siting adjacent to and over water resources where aquatic species baseline data and impact assessments did not occur.

7. Air Quality – Changes in impacts to air quality due to decreased mine life, increased ore processing rates, change in Mine Site traffic patterns, change in tailings design, and change in ore conveyance between Mine Site and Plant Site, including the relocation of the crusher to the Mine Site.

8. Noise and Vibration – Changes in impacts to noise and vibration modeling due to increased ore processing rates, change in ore conveyance between Mine Site and Plant Site, and relocation of the TSF.

9. Cultural Resources – Changes in impacts to cultural resources due to modifications in land use, primarily at the new TSF location.

10. Socioeconomics – Updated social and economic impacts related to the reconfigured NorthMet Project.

11. Recreation and Visual Resources – Changes in impacts to recreation and visual resources due to modifications in land use, primarily associated with the new TSF location and design and changes in stockpile design.

12. Wilderness and Other Special Designation Areas – Adequately addressed in FEIS.

13. Hazardous Materials – Adequately addressed in FEIS.

14. Geotechnical Stability – Changes in geotechnical stability due to waste rock stockpile design, TSF design, and lined tailings storage facility (LTSF) design.

15. Human Health Considerations – Changes to previously assessed human health considerations due to modifications in NorthMet Project design, including in-pit tailings disposal within the TSF.

C. Special Studies or Research

1. Compatibility with Land Use Plans and Regulations – A land use compatibility study will include an assessment of the following areas:

   - Tailings Siting – Tailings management will include in-pit disposal. The TSF is located south of the process plant within the Plant Site. The TSF includes filling four former Area 2/3 mine pits with tailings and will result in an in-pit TSF and a TSF with raised embankments to contain low-sulfur tailings over former minelands and a former railroad embankment.

   - Alternative Ore Conveyance – The conveyor will run from the new crusher at the Mine Site, utilize approximately 3.5 miles along the existing LTVSMC railroad corridor before running adjacent to the Dunka Road and generally following the Dunka Road corridor to the Plant Site.

2. Water Resources – Water resource studies will include assessments of surface water and groundwater quality data within the new TSF location as well as from downstream and adjacent water resources. These assessments will also include a risk assessment on whether in-pit disposal of tailings within the TSF could potentially degrade groundwater quality. Surface water and groundwater quality and quantity will be assessed relative to the change in water management, supply, and water treatment design. Additionally, an unnamed tributary to Wyman Creek was identified within the TSF footprint, and additional fieldwork will be undertaken to characterize the stream for mitigation needs.

3. Wetlands – Wetlands will be delineated and classified within areas not previously assessed. These areas are primarily located within the new TSF location and along the Transportation and Utility Corridors (TUC). In addition, a revised approach for determining potential indirect wetland impacts will be developed and will support indirect wetland impact assessments and future monitoring plan development.

4. Vegetation – Vegetative resources within areas not previously evaluated will be assessed using on-site surveys and native plant communities online database maintained by the MDNR. These areas are primarily located within the new TSF location and along the TUC.

5. Wildlife – Wildlife data will be evaluated on a regional scale. An updated assessment of endangered, threatened, and species of special concern located within the area of the NorthMet Project will be conducted.

6. Aquatic Species – Macroinvertebrate and fish monitoring and habitat assessment surveys will be conducted at locations downstream of the new TSF location.

7. Air Quality – Air quality studies will include assessments of the following criteria:

    - Updated air emission inventory:
        - Mine life decreasing from 20 years to 16 years.
        - Ore processing rate increasing from 32,000 stpd to 40,000 stpd.
        - Changes in Mine Site traffic patterns and TSF design.
        - Ore conveyance method change from rail to overland conveyor between the Mine Site and Plant Site.

    - Updated Class I, Class II, and Air Emissions Risk Assessment analyses will be completed based on the updated air emissions inventory.

    - Global Greenhouse Gas (GHG) inventory:
        - Updated assessment of climate trends in the NorthMet Project area and how NorthMet Project design will interact with the climate trends.
        - Updated inventory of Scope 1 and Scope 2 GHG emission sources, with the change in Scope 1 expected to decrease due to the shorter active mine life with an increased production rate, change from trains to conveyor, change in TSF design, and relocation of the truck shop, offices, and mine support facilities from the Plant Site to the Mine Site. The change in Scope 2 is also expected to decrease due to Minnesota Power's commitment for renewable generation (i.e., 51% renewable now with a commitment to be 100% renewable energy by 2040).

8. Noise and Vibration – Noise and vibration modeling will include assessment of the changes in mining and processing rates, the change in ore conveyance between Mine Site and Plant Site, and the relocation of the TSF.

9. Cultural Resources – Cultural resources will include assessment of the new TSF location and incorporate cultural resource assessments completed after the FEIS was published.

10. Socioeconomics – Socioeconomics will include assessments of updated social and economic data from the U.S. Census Bureau, State of Minnesota, St. Louis County, and other appropriate resources.

11. Recreation and Visual Resources – Recreation and visual studies will include identification of potential key observation points for line-of-sight analyses, sky quality assessment, and baseline data collection for the new TSF location.

12. Geotechnical Stability – Geotechnical stability studies will include assessments of stockpile design, tailings design, and LTSF design.

IV. Proposed Time Schedule

Preparation Notice Publication	October 27, 2026
Preparation Notice Comment Period Ends	November 30, 2026
Distribution of Draft Supplemental EIS	July 26, 2027
Distribution of Final Supplemental EIS	February 22, 2027
Determination of SEIS Adequacy	June 19, 2028

Table 1
Primary Project Changes

Project Component	NorthMet FEIS Action (2015 FEIS Action)	Changes to the Final EIS Action During Permitting	NorthMet SEIS Action (2026 SEIS Action)
Tailings Storage Facility (TSF)	Tailings managed within a FTB constructed on top of the existing LTVSMC tailings basin Cells 1E and 2E.	No change	Tailings managed in the TSF south of the processing plant within the Plant Site. The TSF includes filling four former mine pits with low sulfur tailings and will result in a TSF with raised embankments utilizing centerline dam construction to contain tailings over former minelands and a former railroad embankment.
	Perimeter dams of the FTB raised using an upstream construction method with compacted LTVSMC tailings. Geotechnical stability increased through the placement of rock buttresses from MDNR-approved material sources. Cement deep soil mixing also used to stabilize the existing tailings and peat layers in the northern dam prior to constructing the FTB. Bentonite mixed into the exposed outer slopes of the FTB to restrict oxygen and water infiltration.	Additional engineering refinement occurred during permitting, removing the cement deep soil mixing and increasing the size of the northern rock buttress; however, general FTB configuration and location remain the same as in the 2015 FEIS Action.	Whole tailings deposited into one former mine pit until capacity reaches the pit rim (in-pit TSF). While fine tailings are deposited in the remaining three mine pits, centerline embankments are constructed using coarse tailings produced from cycloning tailings to separate the fine and coarse tailings.
	Seepage capture systems utilized to collect and manage seepage from the tailings basin. Collected seepage pumped back to the FTB pond and/or WWTP for treatment and discharge to the environment.	No change	Seepage management systems utilized to collect and manage seepage from the TSF.
	FTB decant water pumped back to the processing plant for reuse and/or to the WWTP for treatment and discharge to the environment.	No change	TSF decant water and collected seepage pumped to processing plant for reuse and/or pumped to Pit 3 for storage until needed for future reuse. Excess water routed to WWTP for treatment and discharge to the environment.
	During closure, addition of a bentonite layer into the beaches and over the pond bottom to restrict oxygen and water infiltration from the pond.	No change	Upon closure, a coarse tailings cap placed on each TSF will promote surface runoff and dry closure conditions.
	High sulfur tailings blended into the copper concentrate to be shipped off site.	No change	High sulfur tailings blended into the copper concentrate to be shipped off site. Excess high sulfur tailings that cannot be disposed offsite would be stored in a separate LTSF constructed over the existing LTVSMC Emergency Basin. This facility utilizes the design of and replaces the HRF from the 2015 FEIS Action. Similar to the HRF, during closure, this facility will be drained, covered, and reclaimed. (Note: The Hydrometallurgical Plant will not be constructed in the 2026 SEIS Action.)
Mine Site components and layout	Development of three open pits (West, Central, and East) that, upon closure, would include one backfilled pit wetland and one flooded pit void.	No change	Development of two open pits (West and East) that, upon closure, would include one backfilled and flooded pit and one flooded pit void.
	Construction of one permanent and two temporary waste rock stockpiles, a temporary OSLA, and a temporary OSP. Stockpiles located as follows: • Category 1 (<0.12% sulfur) waste rock stockpile northwest of the West pit • Category 2/3 (>0.12% and <0.6% sulfur) waste rock stockpile southeast of the East Pit, also includes saturated mineral overburden • Category 4 (>0.6% sulfur and all Virginia Formation) stockpile over the unmined Central Pit, also includes saturated mineral overburden • the OSLA and OSP centrally located south of the mine pits	No change	Construction of one PRSF, one TRSF, a temporary OSLA, and a temporary OSP. • PRSF will contain Category 1 (<0.20% sulfur) waste rock located in the same general location as the 2015 FEIS Category 1 stockpile and will have similar seepage management system. • TRSF will contain Category 2, 3, and 4 (≥0.20% sulfur and all Virginia Formation) waste rock, saturated mineral overburden, and ore on an engineered, geomembrane-lined foundation. When compared to the 2015 FEIS Action Category 2/3 Stockpile location, the TRSF has been moved away from the Partridge River and is now centrally located, immediately south of the mine pits. • OSLA located west of the PRSF. • OSP located west of the crusher and south of the OSLA, with an engineered, geomembrane-lined foundation.

Project Component	NorthMet FEIS Action (2015 FEIS Action)	Changes to the Final EIS Action During Permitting	NorthMet SEIS Action (2026 SEIS Action)
Mine Site components and layout (continued)	Construction and operation of a Rail Transfer Hopper (for loading ore on trains) with railroad spur track, Fueling and Maintenance Facility, and other Mine Site support infrastructure. Major equipment maintenance completed in Area 1 Shops (Plant Site) with mine offices, change-houses, and support facilities at Area 2 shops (Plant Site).	No change	Ore handling facilities include a crusher, overland conveyor, and an OSP, all located west of the West Pit. Mine support facilities (fueling facilities, maintenance facilities, offices, change-houses, etc.) are now located southwest of the West Pit. Major equipment maintenance completed at the Mine Site.
	Construction and operation of a WWTF west of the Rail Transfer Hopper.	WWTF removed from Mine Site and combined with WWTP at Plant Site.	WWTP located at the Plant Site.
	Construction and operation of equalization basins and central pumping station/pond collocated with the WWTF.	Equalization basins and central pumping station/pond moved to the south side of Dunka Road.	Equalization basin located within the West Pit. The equalization basin will store contact water collected at the Mine Site before it is pumped via a pit-to-plant pipeline to the Plant Site for reuse.
Water management and water treatment design	Mine Site contact water collected from the mine pits, waste rock stockpiles, OSP, and ancillary mine features would be managed and treated at the Mine Site WWTF with the treated water pumped to the FTB via a Mine-to-Plant Pipeline, which is located within the TUC. Mine Site WWTF includes chemical precipitation and membrane filtration treatment technologies, adding reverse osmosis or similar membrane separation technology in closure.	WWTP and WWTF are combined into a single WWTS at the Plant Site. Mine-to-Plant Pipeline to move water from the Mine Site to the Plant Site along the TUC increased from one to three.	Mine Site contact water collected from the mine pits, rock storage facilities, OSP, and ancillary mine features is managed in an equalization basin in the West Pit. Water within the equalization basin is pumped via a pit-to-plant pipeline, located within the TUC, to the Plant Site for reuse.
	FTB seepage and FTB decant water, as needed, collected and routed to the Plant Site WWTP for treatment and discharge to the environment.	No change	TSF decant water and collected seepage pumped to processing plant for reuse and/or pumped to Pit 3 for storage for future reuse. Excess water within Pit 3 routed to WWTP for treatment and discharge to the environment. Water within Pit 3 utilized as make-up water during times when the processing plant needs cannot be maintained by directly pumping from the TSF decant pond.
	Plant Site WWTP includes reverse osmosis or similar membrane separation technology. Reject concentrate from the WWTP transported to the WWTF at the Mine Site via rail tank cars.	WWTS components include a mine water treatment train (chemical precipitation and membrane filtration) and a tailings basin treatment train (membrane separation technology and stabilization).	WWTP treatment train includes equalization, chemical precipitation, biological treatment, filtration, membrane separation, and stabilization.
	FTB decant pond utilized as the primary source of water for the beneficiation process with additional make-up water obtained from Colby Lake.	No change	Pit 3 provides water management flexibility, providing excess storage capacity during times of surplus water conditions, provides make-up water during periods of water shortage, and attenuates flows to the WWTP.
Ore conveyance to Plant Site	Ore conveyance using trains along the existing railroad within the TUC. This will require construction of a new rail connection track.	No change	Ore conveyance using a covered overland conveyor system within the TUC. This will include construction of an adjacent maintenance road when not located along Dunka Road and wildlife crossings.
Ore production	32,000 stpd	No change	40,000 stpd

Abbreviations:
FEIS = Final Environmental Impact Statement
FTB = Flotation Tailings Basin
HRF = Hydrometallurgical Residue Facility
LTSF = Lined Tailings Storage Facility
LTVSMC = LTV Steel Mining Company
MDNR = Minnesota Department of Natural Resources
OSLA = Overburden Storage & Laydown Area
OSP = Ore Surge Pile
PRSF = Permanent Rock Storage Facility
SEIS = Supplemental Environmental Impact Statement
stpd = short tons per day
TRSF = Temporary Rock Storage Facility
TSF = Tailings Storage Facility
TUC = Transportation and Utility Corridor
WWTF = Wastewater Treatment Facility
WWTP = Wastewater Treatment Plant
WWTS = Wastewater Treatment System

ATTACHMENT A



Mud Lake
Spring Mine Creek
Ridge Creek
Partridge River
Mud Lake
Yelp Creek
Superior National Forest
Mine Site
Spring Mine Lake
Stubble Creek
Plant Site
Transportation and Utility Corridors
Wyman Creek
Town of White
City of Hoyt Lakes
City of Hoyt Lakes
City of Babbitt
Second Creek
Wetlegs Creek
Stephens Creek
Kensington Drive
Longnose Creek
South Branch Partridge River
Colvin Creek
First Creek
Colby Lake Pipeline Corridor
Partridge River
Wyman Creek
Partridge River
Colby Lake

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6500 Kensington Dr
Hoyt Lakes, MN USA 55750
Sunrise Project Office
23 Commerce Road
Babbitt, MN USA 55706

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FIGURE 1
OVERALL NORTHMET PROJECT AREA COMPARISON

NAD 1983 2011 StatePlane Minnesota North FIPS 2201 Ft US

DATE: July 29, 2026 | DRAWN BY: Foth, BJW1

Legend

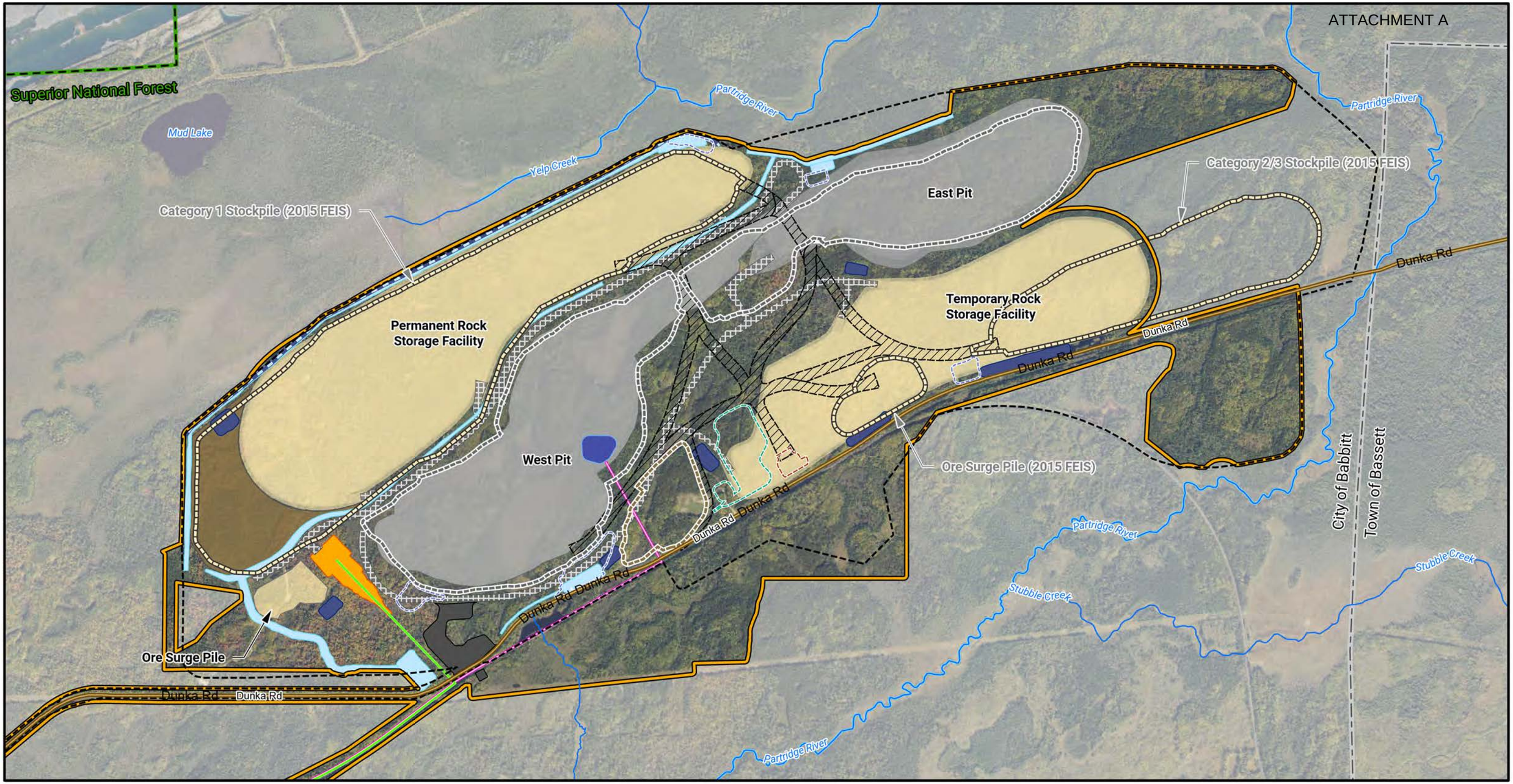
- Current Proposed NorthMet Project Area
- 2015 NorthMet FEIS Project Area
- Site Roads
- Roads
- Public Waters Inventory (PWI) Watercourse
- National Hydrography Dataset (NHD) Flowline
- Municipal Boundary

N

0 1 2 Miles

Credits: 2025 60cm resolution imagery service from USDA FPAC-BC-GEO NAIP. Administrative, hydrographic, and transportation data from Minnesota Geospatial Commons.

ATTACHMENT A



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FIGURE 2
NORTHMET MINE SITE PROJECT AREA COMPARISON

NAD 1983 2011 StatePlane Minnesota North FIPS 2201 Ft US

DATE: July 29, 2026 | DRAWN BY: Foth, BJW1

Legend

- Current Proposed NorthMet Project Area
- 2015 NorthMet FEIS Project Area
- Site Roads
- Roads
- Public Waters Inventory (PWI) Watercourse
- National Hydrography Dataset (NHD) Flowline
- Municipal Boundary
- Superior National Forest Boundary

Current Proposed Mine Site Features

- Overland Ore Conveyor
- Pit to Plant Pipeline
- Stormwater Dike
- Stormwater
- Equalization Basin
- Contact Water Ponds
- Primary Crusher
- Haul Roads
- Overburden Storage
- Stockpiles
- Mine Pits
- Auxilary Mine Facilities Area

Mine Site Features (2015 FEIS)

- Mine Pit
- Stockpiles
- Overburden Storage & Laydown Area
- Mine Site Pond
- Rail Transfer Hopper
- Haul Roads
- Wastewater Treatment Facility

N

0 1,600 3,200 Feet

Credits: 2025 60cm resolution imagery service from USDA FPAC-BC-GEO NAIP. Administrative, hydrographic, and transportation data from Minnesota Geospatial Commons.

ATTACHMENT A

Cell 2W
(2015 FEIS)

Cell 1E/2E
(2015 FEIS)

Spring Mine Creek

Spring Mine Lake

Superior National Forest

Plant Site

Processing Plant

Transportation and Utility Corridors

Pit A
In-Pit TSF

TSF

Wyman Creek

Longnose Creek

Second Creek

Stephens Creek

Town of White

City of Hoyt Lakes

City of Hoyt Lakes

City of Babbitt

Legend

- Current Proposed NorthMet Project Area
- 2015 NorthMet FEIS Project Area
- Site Roads
- Roads
- Public Waters Inventory (PWI) Watercourse
- National Hydrography Dataset (NHD) Flowline
- Municipal Boundary
- Superior National Forest Boundary

Current Proposed Plant/Tailings Features

- Overland Ore Conveyor
- Pit to Plant Pipeline
- Colby Lake Pipeline
- Stormwater
- Plant Roads
- Lined Tailings Storage Facility Footprint

- Existing Building
- Proposed Building

Tailings Storage Facility

- Pond
- Embankment
- Embankment Crest

Plant Site Features (2015 FEIS)

- Hydrometallurical Residue Facility
- FTB Seepage Containment System

N

0 3,000 6,000 Feet

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Hoyt Lakes, MN USA 55750

Sunrise Project Office
23 Commerce Road
Babbitt, MN USA 55706

FIGURE 3
NORTHMET PLANT SITE PROJECT AREA COMPARISON

NAD 1983 2011 StatePlane Minnesota North FIPS 2201 Ft US

DATE: July 29, 2026 | DRAWN BY: Foth, BJW1

Credits: 2025 60cm resolution imagery service from USDA FPAC-BC-GEO NAIP. Administrative, hydrographic, and transportation data from Minnesota Geospatial Commons.

US Army Corps of Engineers®

PUBLIC NOTICE

St. Paul District
Permit Application
No. 1999-05528

Published: August 13, 2026
Expires: September 12, 2026

Interested parties are hereby notified that the U.S. Army Corps of Engineers (USACE), St. Paul District has received an application for a Department of the Army (DA) permit pursuant to Section 404 of the Clean Water Act (33 U.S.C. § 1344). The purpose of this public notice is to solicit comments from the public and information necessary to evaluate the probable impact on the public interest regarding the proposed activity as described below and as shown on the enclosed drawings. The full permit application and appendixes from the applicant are available on our website at the following location: https://www.mvp.usace.army.mil/Missions/Regulatory/NorthMet/

APPLICANT: NewRange Copper Nickel LLC
6500 Kensington Drive
Hoyt Lakes, MN 55750

LOCATION OF PROPOSED ACTIVITY: The proposed NorthMet Project is located in Sections 5 and 6, Township 58 North, Range 14 West; Sections 1, 2, 3, 4, 8, 9, 10, 11, 12, 15, 16, 17, and 18, Township 59 North, Range 13 West; Sections 8, 9, 10, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 27, 28, 29, and 32, Township 59 North, Range 14 West; and Sections 13, 14, 15, 22, 23, and 24, Township 59 North, Range 15 West, in St. Louis County, Minnesota. The approximate center point of the NorthMet Project is at Latitude 47.57932 and Longitude -92.07832148.

PROPOSED ACTIVITY: The applicant is requesting a Department of the Army (DA) permit to discharge dredged and fill material into waters of the United States (WOTUS) in support of the NorthMet Mine and Ore Processing Facilities Project (NorthMet Project). The proposed NorthMet Project combines legacy infrastructure, including re-use of the LTV Steel Mining Company (LTVSMC) taconite processing facility, with new development for extracting, handling, and processing ore for copper, nickel, cobalt, and platinum group elements to support U.S. domestic critical mineral production. The project encompasses approximately 7,800 acres across four primary areas:

- Mine Site
- Plant Site
- Transportation and Utility Corridors (TUC)
- Colby Lake Pipeline Corridor

Following USACE's revocation of its Clean Water Act Section 404 permit in June 2023, the proposed NorthMet project design has been modified to address water quality and environmental concerns that were identified during the prior regulatory process.

Adjustments to the layout of the Mine Site and Plant Site (including stockpiles, buildings, and water management infrastructure) would remain entirely within the project areas previously evaluated. This DA permit application includes the following modifications:

Project Feature	Previous Design	Modified Design
Tailings Management	Tailings Basin disposal	In-pit tailings disposal on adjacent prior minelands; complete relocation and redesign of the Tailings Storage Facility (TSF) to address prior water quality concerns.
Ore Conveyance	Rail transport	8-mile covered conveyor system between the Mine Site and Plant Site, reducing greenhouse gases and potential fugitive emissions.
Processing	Included hydrometallurgical plant	Removed the hydrometallurgical plant processing step entirely from the project design.
Water & Environmental Controls	Prior water management plan	Comprehensive updates to water management and water treatment protocols.
Mine Plan Layout	Original footprint	Optimized layout designed to shift operations away from the Partridge River, consolidate mining infrastructure, and provide operational flexibility.
Production & Lifespan	32,000 short tons per day (stpd) over 20 years	40,000 stpd with increased operational efficiency, reducing the overall mine life to 16 years.

Jurisdictional Determination: This application is being reviewed in accordance with the practices for documenting USACE jurisdiction under Section 404 of the Clean Water Act. The applicant has requested that USACE evaluate the project site for any non-jurisdictional waters, including non-adjacent wetlands and potentially non-jurisdictional deepwater pit lakes and non-jurisdictional ditches, that could be removed from the final permit evaluation. USACE will evaluate the jurisdiction of all aquatic resources on-site and complete an Approved Jurisdictional Determination (AJD) to identify the extent of any aquatic resources that are not jurisdictional under the Clean Water Act. All information regarding impacts provided in this public notice is based on overall aquatic resources located within the proposed impact areas, absent a final AJD from USACE.

Direct Wetland Impacts: Approximately 1,145 acres of wetlands were identified and delineated within the impact areas for the Mine Site, Plant Site, and TUC. No wetland impacts are proposed along the Colby Lake Pipeline Corridor. Wetlands located within the proposed impact areas are identified in Appendix C of the permit application.

Potential Indirect Wetland Impacts: The applicant has proposed two plans to evaluate potential indirect wetland impacts associated with the project. The Potential Indirect Wetland Impact Modeling Work Plan (Appendix F of permit application) describes groundwater and surface water modeling proposed to forecast hydrological shifts across the project. The results of this assessment of potential indirect effects from regulated activities would be incorporated into a revised water quality modeling assessment to support the evaluation of compliance with applicable water quality standards. The plan for Monitoring for Potential Indirect Wetland Impacts (Appendix G of permit application) is proposed to utilize monitoring wells to track potential changes hydrology, vegetation, and wetland boundaries. Baseline wetland hydrology monitoring within and surrounding the proposed mine was conducted from 2005 to 2020 and in 2025. Wetland hydrology monitoring is proposed to continue during and after any authorized project construction to help evaluate potential indirect wetland impacts.

Deep-water Pit Lakes: Five deep-water pit lakes extend into the proposed impact area for the TSF and would be directly impacted. The applicant provided the acreages of the deep-water pit lakes in a memorandum dated August 12, 2026: Pit A (241.5 acres), Pit B (102.2 acres), Pit C (15.7 acres), Pit D (46.3 acres), and Area 3 (0.2-acre).

Stream Impacts: Approximately 2,839 linear feet of an unnamed tributary to Wyman Creek is located within the proposed impact area for the TSF, and approximately 365 linear feet of an unnamed tributary to the Partridge River is located within the proposed impact area for the Mine Site. The applicant has provided a stream characterization work plan detailing fieldwork completed in 2025, as well as fieldwork underway for 2026. A final report detailing the data collection and results will be provided to USACE when available and will be used during the permit evaluation process to assess the functional loss of stream resources. The proposed Stream Characterization Work Plan is in Appendix H.

MITIGATION: The applicant has provided information on avoidance and minimization measures to aquatic resources, including wetlands, that were analyzed in the prior regulatory process and for the proposed revised design of the NorthMet Project in Section 5 of the permit application. Alternatives to minimize wetland impacts at the Mine Site, Plant Site, TUC, and the Colby Lake Pipeline Corridor were summarized by the applicant using the following general strategies:

- Minimize the footprint and optimize the placement of mining features at the Mine Site
- Minimize impacts at the TSF by avoiding Second Creek and Wyman Creek
- Maintain a smaller disturbance footprint by re-using existing infrastructure and former mining disturbance areas, mainly at the Plant Site, TUC, and Colby Lake Pipeline Corridor

• Utilize existing facilities and structures, to the extent practicable, to support ongoing activities, mainly at the Plant Site, TUC, and Colby Lake Pipeline Corridor
• Utilize tailings disposal in a single area on a former mine site utilizing storage capacity of former mine pits to the extent possible
• Once the rim-level capacity of the former mine pits are exhausted, expand the proposed tailings disposal site upward, to the extent geotechnically practicable, therefore disturbing less surface area while allowing more material to be placed in the same footprint
• Divert runoff upgradient of facilities into undisturbed drainages
• Install culverts to facilitate flow across wetland areas where practicable

Compensatory mitigation for unavoidable direct wetland impacts is proposed through the purchase of credits from a federally approved wetland mitigation bank. During the prior evaluation of the NorthMet Project, the Lake Superior Wetland Mitigation Bank was approved by USACE to provide wetland credits to offset authorized losses of WOTUS. The applicant has purchased 1,969 USACE-approved wetland credits from the Lake Superior Wetland Mitigation Bank in Bank Service Area 1, within the St. Louis River watershed in St. Louis County, Minnesota, which is the same Bank Service Area where the proposed wetland impacts would occur. The applicant has proposed that compensatory mitigation for wetland impacts associated with the proposed activity be provided at a 1:1 replacement ratio, utilizing the previously purchased credits, and states that the purchased credits are sufficient to compensate for proposed wetland loss. Potential mitigation requirements for proposed indirect wetland effects would be evaluated by USACE during the permit review process.

The applicant proposes that any required compensatory mitigation for stream impacts would be developed in accordance with USACE St. Paul District Stream Mitigation Procedures. The applicant has collected baseline functional data across 11 stream reaches on the unnamed tributary to Wyman Creek, and one stream reach on the unnamed tributary (West Pit Outlet) to the Partridge River. Additional fieldwork is anticipated by the applicant to complete the existing conditions assessment and quantify potential stream losses. USACE will consider all information provided, including additional field data, to evaluate the functional quality of the affected resources and the duration and severity of potential impacts. This evaluation will be used to support the overall permit decision and any potential stream mitigation requirements.

HISTORIC PROPERTIES/CULTURAL RESOURCES: Previous cultural resource investigations for the prior NorthMet Project, conducted between 2005 and 2015 in coordination with the Minnesota State Historic Preservation Office (SHPO), the Advisory Council on Historic Preservation, and Tribal Historic Preservation Officers, identified archaeological sites, architectural properties, cultural landscapes, and traditional cultural properties within the area of potential effects, including properties determined eligible for listing in the National Register of Historic Places. In accordance with Section 106 of the National Historic Preservation Act (NHPA), the previous consultation for the prior NorthMet Project resulted in the execution of a Memorandum of Agreement (MOA) in

2016 to resolve and mitigate adverse effects on historic properties. The applicant continues to implement applicable stipulations of that agreement.

USACE will utilize the results of previous consultations and will coordinate additional Section 106 review and consultation focused on the proposed modifications to the NorthMet Project. USACE's final eligibility and effect determination relative to Section 106 of the NHPA will be subject to additional coordination with the SHPO, federally recognized tribes, and other interested parties, and with full consideration given to the proposed undertaking's potential direct and indirect effects on historic properties.

ENDANGERED SPECIES: An April 2015 Biological Assessment completed for the prior NorthMet Project evaluated potential effects on the northern long-eared bat, Canada lynx, and gray wolf. In February 2016, the U.S. Fish and Wildlife Service (USFWS) issued a Biological Opinion for the NorthMet Project with conservation measures.

USACE will consult with the USFWS for changes to the NorthMet Project and any new potential effects to threatened or endangered species, including two proposed species listed since the 2016 Biological Opinion, Suckley's cuckoo bumble bee (proposed endangered) and Monarch butterfly (proposed threatened).

WATER QUALITY CERTIFICATION: An Individual Water Quality Certification will be required from the Minnesota Pollution Control Agency pursuant to Section 401 of the Clean Water Act (33 U.S.C. § 1341). A DA permit will not be granted until the certifying authorities have issued or waived Section 401 WQC certification.

NOTE: This public notice is being issued based on information furnished by the applicant. This information has not been verified or evaluated to ensure compliance with laws and regulation governing the regulatory program. The geographic extent of aquatic resources within the proposed project area that either are, or are presumed to be, within USACE jurisdiction has not been verified by USACE personnel.

EVALUATION: The decision whether to issue a permit will be based on an evaluation of the probable impact including cumulative impacts of the proposed activity on the public interest. That decision will reflect the national concern for both protection and utilization of important resources. The benefits, which reasonably may be expected to accrue from the proposal, must be balanced against its reasonably foreseeable detriments. All factors which may be relevant to the proposal will be considered including cumulative impacts thereof; among these are conservation, economics, aesthetics, general environmental concerns, wetlands, historical properties, fish and wildlife values, flood hazards, floodplain values, land use, navigation, shoreline erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, considerations of property ownership, and in general, the needs and welfare of the people. Evaluation of the impact of the activity on the public interest will also include application of the guidelines promulgated by the Administrator, Environmental Protection Agency (EPA), under authority of Section 404(b) of the Clean Water Act or the criteria established under authority of

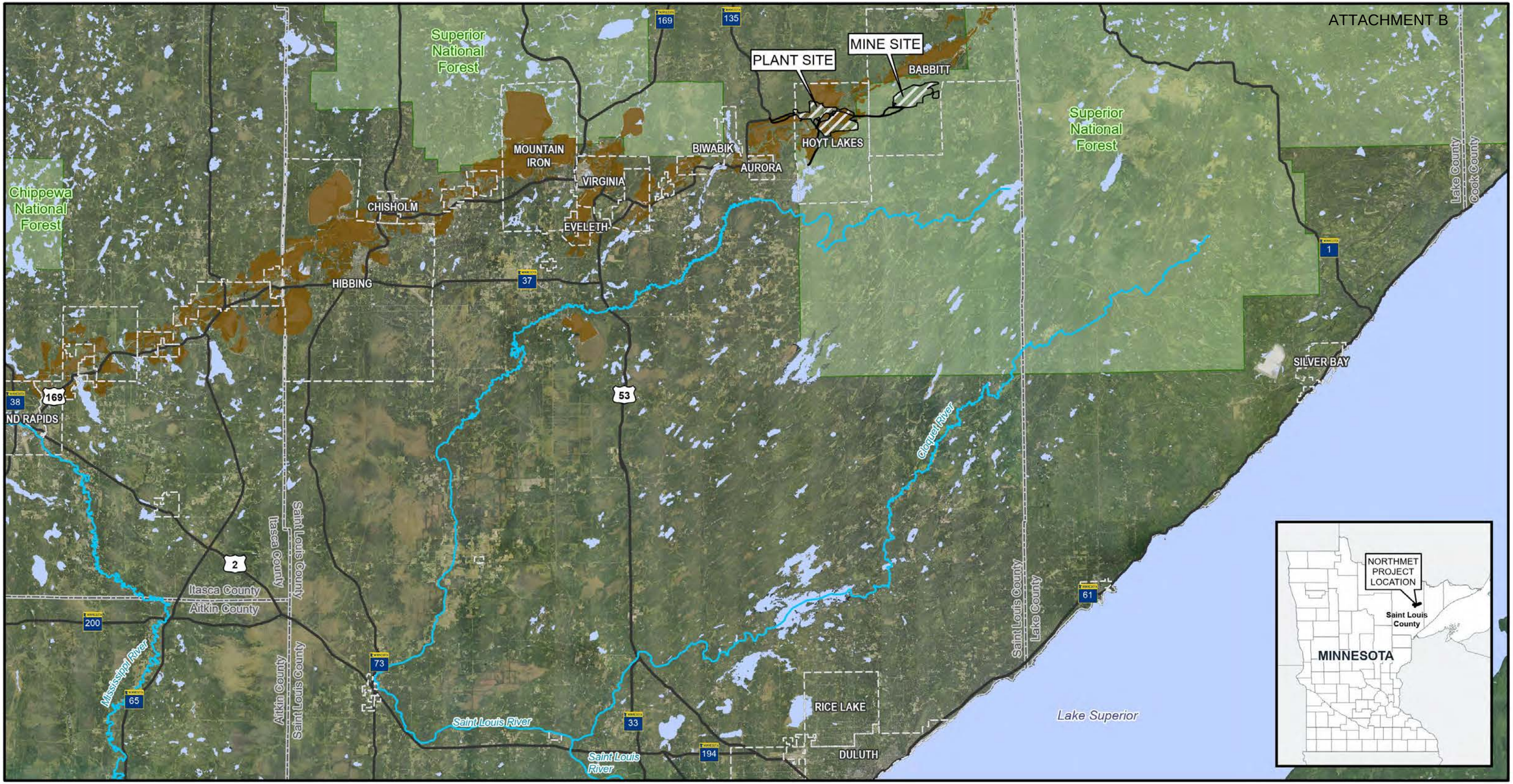
Section 102(a) of the Marine Protection Research and Sanctuaries Act of 1972. A permit will be granted unless its issuance is found to be contrary to the public interest.

COMMENTS: The USACE is soliciting comments from the public; Federal, State, and local agencies and officials; Tribal Nations; and other interested parties in order to consider and evaluate the impacts of this proposed activity. Any comments received will be considered by USACE to determine whether to issue, modify, condition, or deny a permit for this proposed activity. To make this determination, comments are used to assess impacts to endangered species, historic properties, water quality, general environmental effects, and the other public interest factors listed above. Comments are used in the preparation of an Environmental Assessment and/or an Environmental Impact Statement pursuant to the National Environmental Policy Act. Comments are also used to determine the need for a public hearing and to determine the overall public interest of the proposed activity. Any comments or objections which are received during this period may be forwarded to the applicant for possible resolution before the determination is made whether to issue or deny the requested permit. Please note that all comments received will become part of the administrative record and are subject to public release under the Freedom of Information Act.

Any person may request, in writing, within the comment period specified in this notice, that a public hearing be held to consider the application. Requests for public hearings shall state, with particularity, the reasons for holding a public hearing. Requests for a public hearing will be granted, unless the District Engineer determines that the issues raised are insubstantial or there is otherwise no valid interest to be served by a hearing.

The St. Paul District will receive written comments on the proposed activity, as outlined above, until September 12, 2026. Comments should be submitted electronically via the Regulatory Request System (RRS) at https://rrs.usace.army.mil/rrs/public-notices. Alternatively, comments may be submitted by mail to the U.S. Army Corps of Engineers, St. Paul District, Regulatory Division, Attn: NorthMet, 332 Minnesota Street, Suite E1500, St. Paul, Minnesota 55101. Please refer to file number **1999-05528-WMS** in all your comments. Questions concerning this notice may be directed to CEMVP-NorthMet-Review@usace.army.mil.

ATTACHMENT B



Head Office & NorthMet Project Office
6500 Kensington Dr
Hoyt Lakes, MN USA 55750

Sunrise Project Office
23 Commerce Road
Babbitt, MN USA 55706

NEW RANGE COPPER NICKEL

Large Figure 1
NorthMet Project Site Location
2026 Section 404 Permit Application

NAD 1983 StatePlane Minnesota North FIPS 2201 Feet

DATE: July 29, 2026

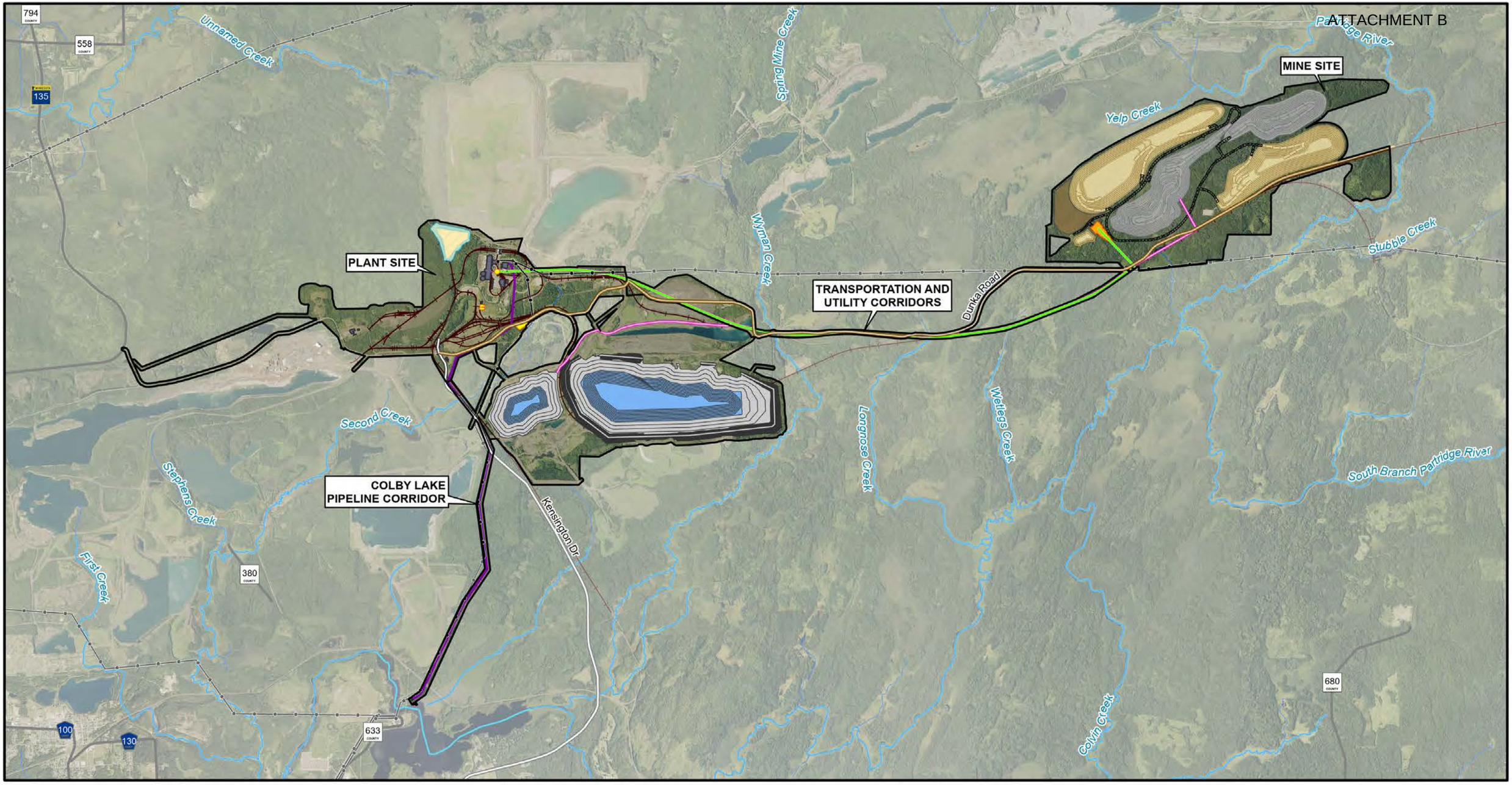
DRAWN BY: Barr Engineering Co., ARM2

- NorthMet Project Areas
- Mesabi Iron Range
- National Forest Boundary
- County Boundaries
- City Boundaries
- Major River
- Lakes

N

0 7.5 15 Mi

Credits: 2024 60cm resolution imagery service from USDA FPAC-BC-GEO NAIP. Administrative, hydrographic, and transportation data from MnDNR, MNDOT, USGS.



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Large Figure 2
NorthMet Project Areas
2026 Section 404 Permit Application

NAD 1983 StatePlane Minnesota North FIPS 2201 Feet

DATE: July 29, 2026 | DRAWN BY: Barr Engineering Co., ARM2

- NorthMet Project Areas
- Dunka Road
- Kensington Drive
- Roads
- Existing Railroads
- Electric Transmission Lines
- Conveyor Centerline
- Pit to Plant Pipeline
- Colby Lake Pipeline
- Primary Crusher
- Haul Roads
- Overburden Storage
- Stockpiles
- Mine Pits
- Existing Building
- Proposed Building
- LTSF Footprint

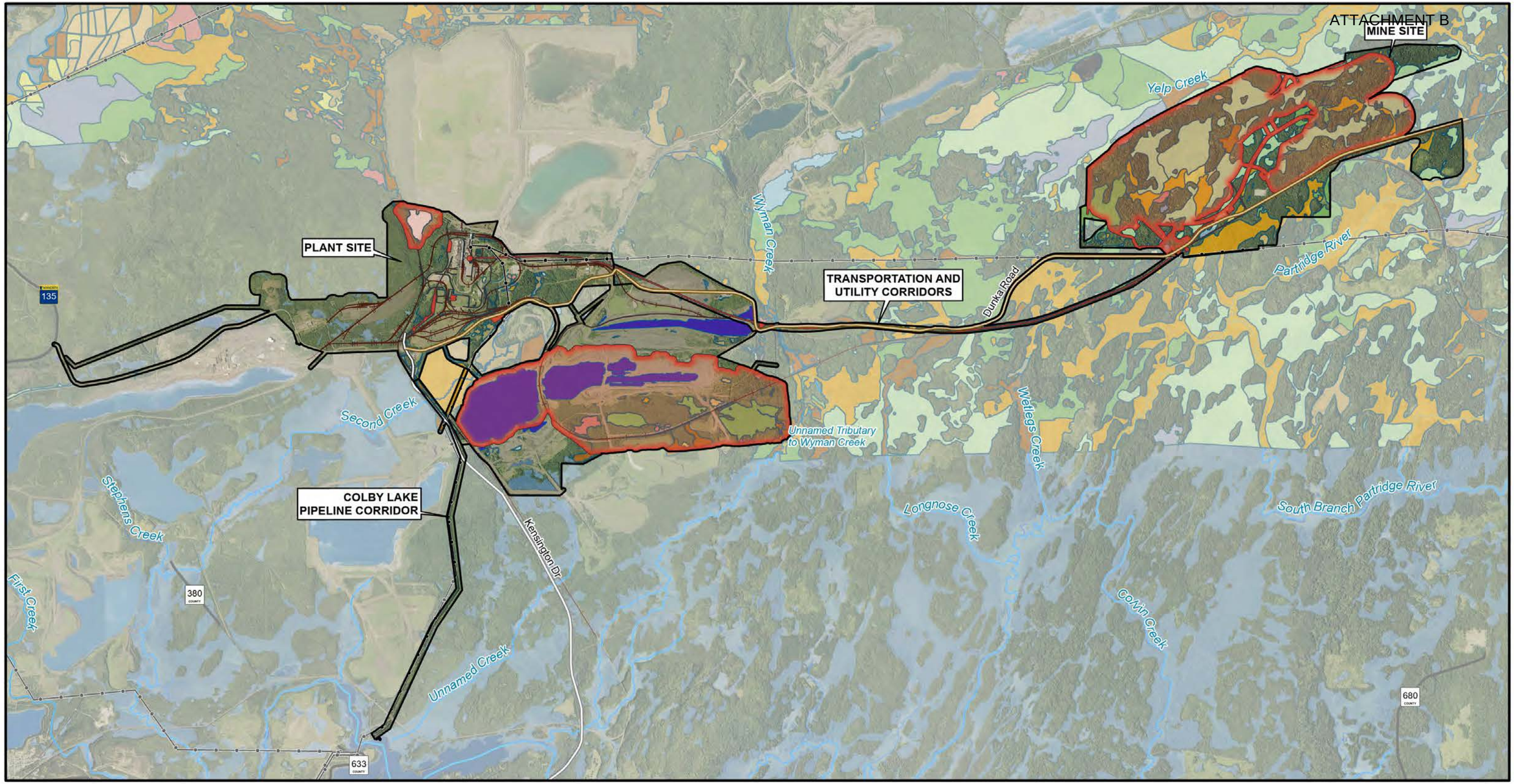
Tailings Storage Facility

- Pond
- Embankment
- Embankment Crest
- Public Waters Inventory (PWI) Watercourses
- National Hydrography Dataset (NHD) Rivers & Streams

N

0 1 2 Mi

Credits: 2024 60cm resolution imagery service from USDA FPAC-BC-GEO NAIP. Administrative, hydrographic, and transportation data from MnDNR, MNDOT, USGS.



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Large Figure 10
Impact Area
2026 Section 404 Permit Application

NAD 1983 StatePlane Minnesota North FIPS 2201 Feet

DATE: July 29, 2026

DRAWN BY: Barr Engineering Co., ARM2

- NorthMet Project Areas
- Impact Area
- Dunka Road
- Kensington Drive
- Roads
- Existing Railroads
- Electric Transmission Lines
- Public Waters Inventory (PWI) Watercourses
- National Hydrography Dataset (NHD) Rivers & Streams
- Deepwater Pit Lake
- National Wetlands Inventory (NWI)
- Exempt Wetland

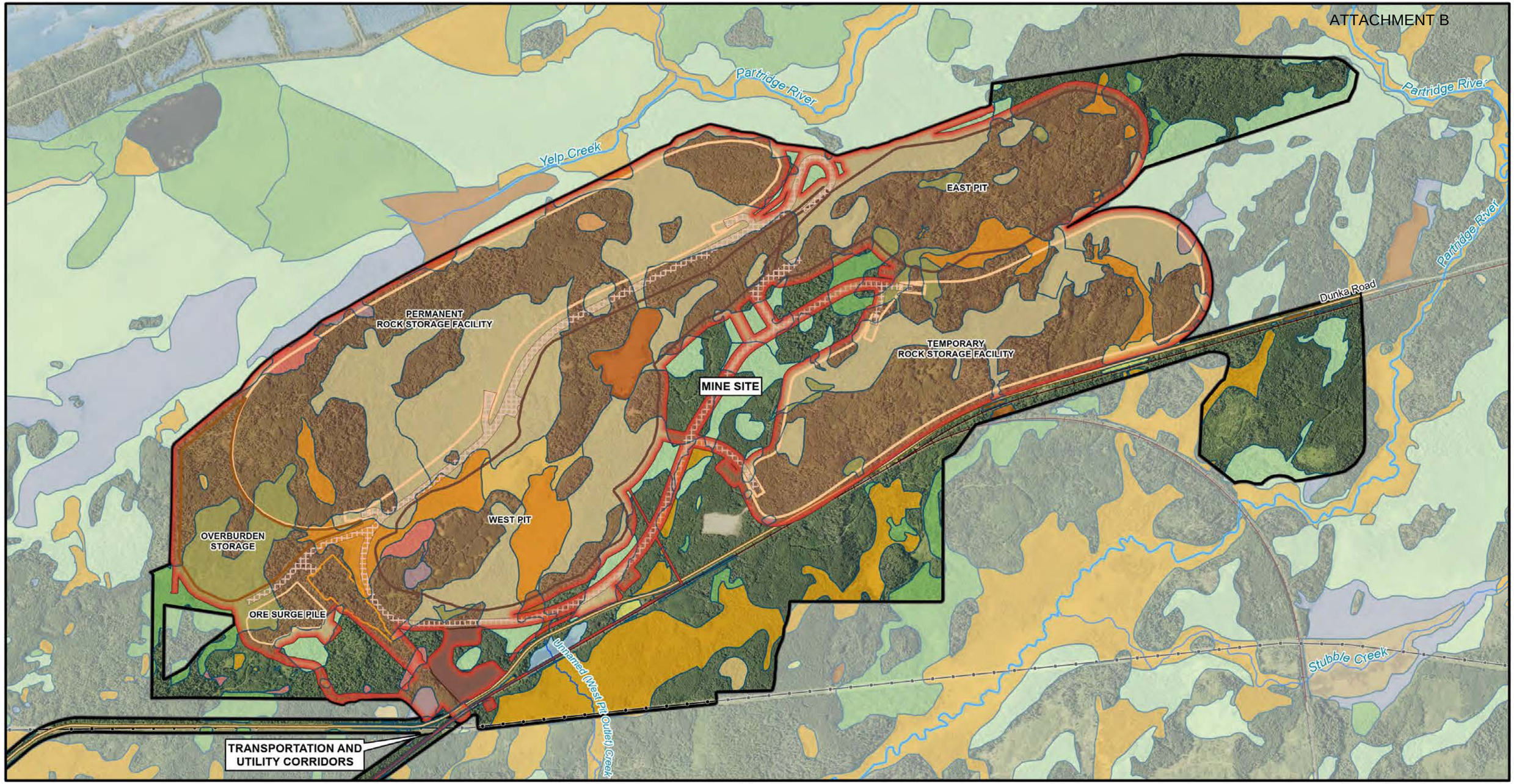
Dominant Eggers & Reed (2015) Wetland Community Type

- Alder Thicket
- Coniferous Bog
- Coniferous Swamp
- Deep Marsh
- Hardwood Swamp
- Open Bog
- Seasonally Flooded Basin
- Sedge Meadow, Fresh (Wet) Meadow
- Shallow Marsh
- Shallow, Open Water
- Shrub-Carr

N

0 0.9 1.8 Mi

Credits: 2024 60cm resolution imagery service from USDA FPAC-BC-GEO NAIP. Administrative, hydrographic, and transportation data from MnDNR, MNDOT, USGS.



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Large Figure 16
Mine Site Direct Wetland Impacts
2026 Section 404 Permit Application

NAD 1983 StatePlane Minnesota North FIPS 2201 Feet

DATE: July 29, 2026 | DRAWN BY: Barr Engineering Co., ARM2

- NorthMet Project Areas
- Impact Area
- Dunka Road
- Existing Railroads
- Electric Transmission Lines
- Primary Crusher
- Haul Roads
- Stockpiles
- Mine Pits
- Auxilary Mine Facilities Area
- Public Waters Inventory (PWI) Watercourses
- National Hydrography Dataset (NHD) Rivers & Streams
- National Wetlands Inventory (NWI)

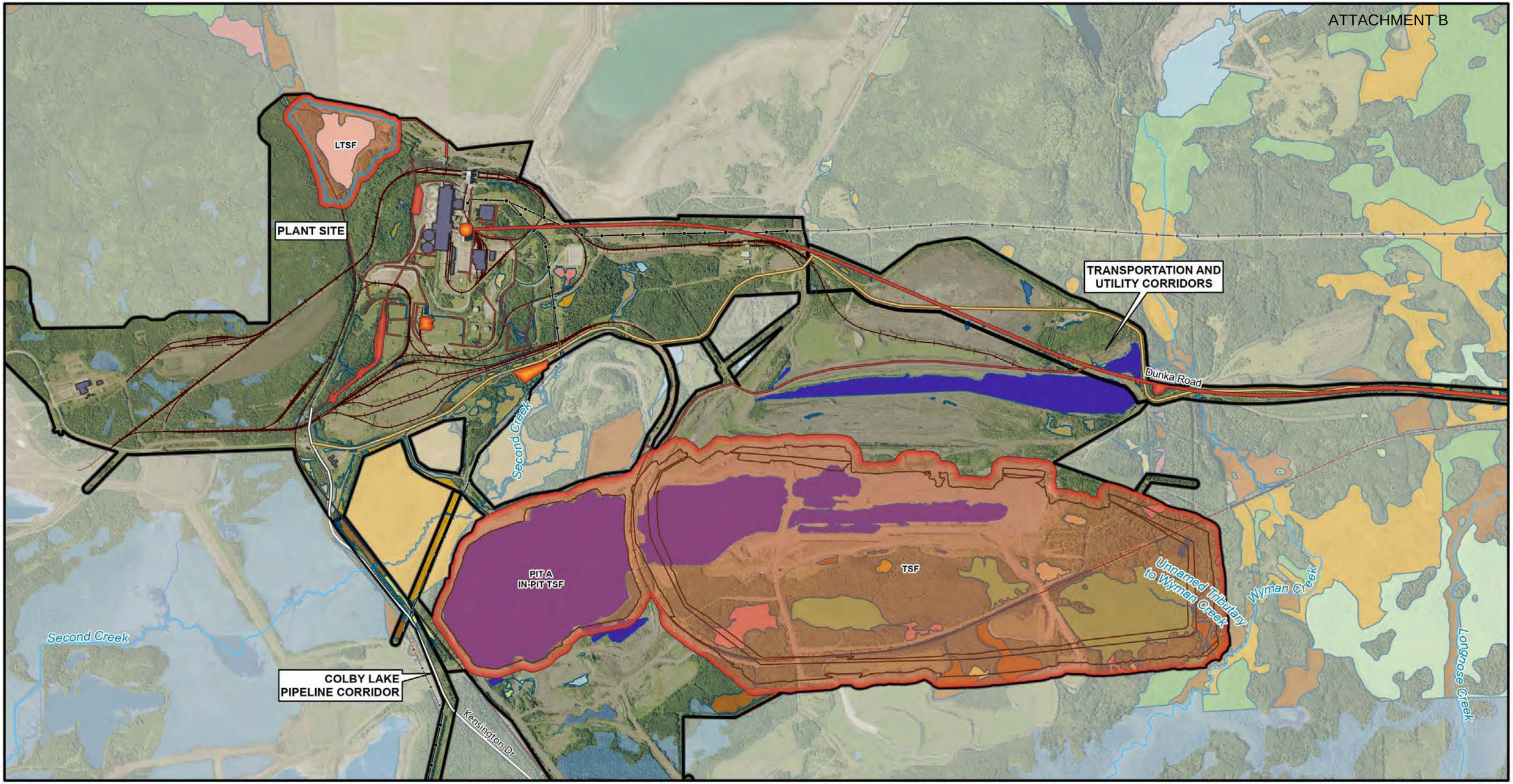
Dominant Eggers & Reed (2015) Wetland Community Type

- Alder Thicket
- Coniferous Bog
- Coniferous Swamp
- Deep Marsh
- Hardwood Swamp
- Open Bog
- Seasonally Flooded Basin
- Sedge Meadow, Fresh (Wet) Meadow
- Shallow Marsh
- Shallow, Open Water
- Shrub-Carr

N

0 1,500 3,000 Feet

Credits: 2024 60cm resolution imagery service from USDA FPAC-BC-GEO NAIP. Administrative, hydrographic, and transportation data from MnDNR, MNDOT, USGS.



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Large Figure 17
Plant Site Direct Wetland Impacts
2026 Section 404 Permit Application

NAD 1983 StatePlane Minnesota North FIPS 2201 Feet

DATE: July 29, 2026 | DRAWN BY: Barr Engineering Co., ARM2

- NorthMet Project Areas
- Impact Area
- Dunka Road
- Kensington Drive
- Existing Railroads
- Electric Transmission Lines
- Existing Building
- Proposed Building

- Public Waters Inventory (PWI) Watercourses
- National Hydrography Dataset (NHD) Rivers & Streams
- Deepwater Pit Lake
- National Wetlands Inventory (NWI)
- Exempt Wetland

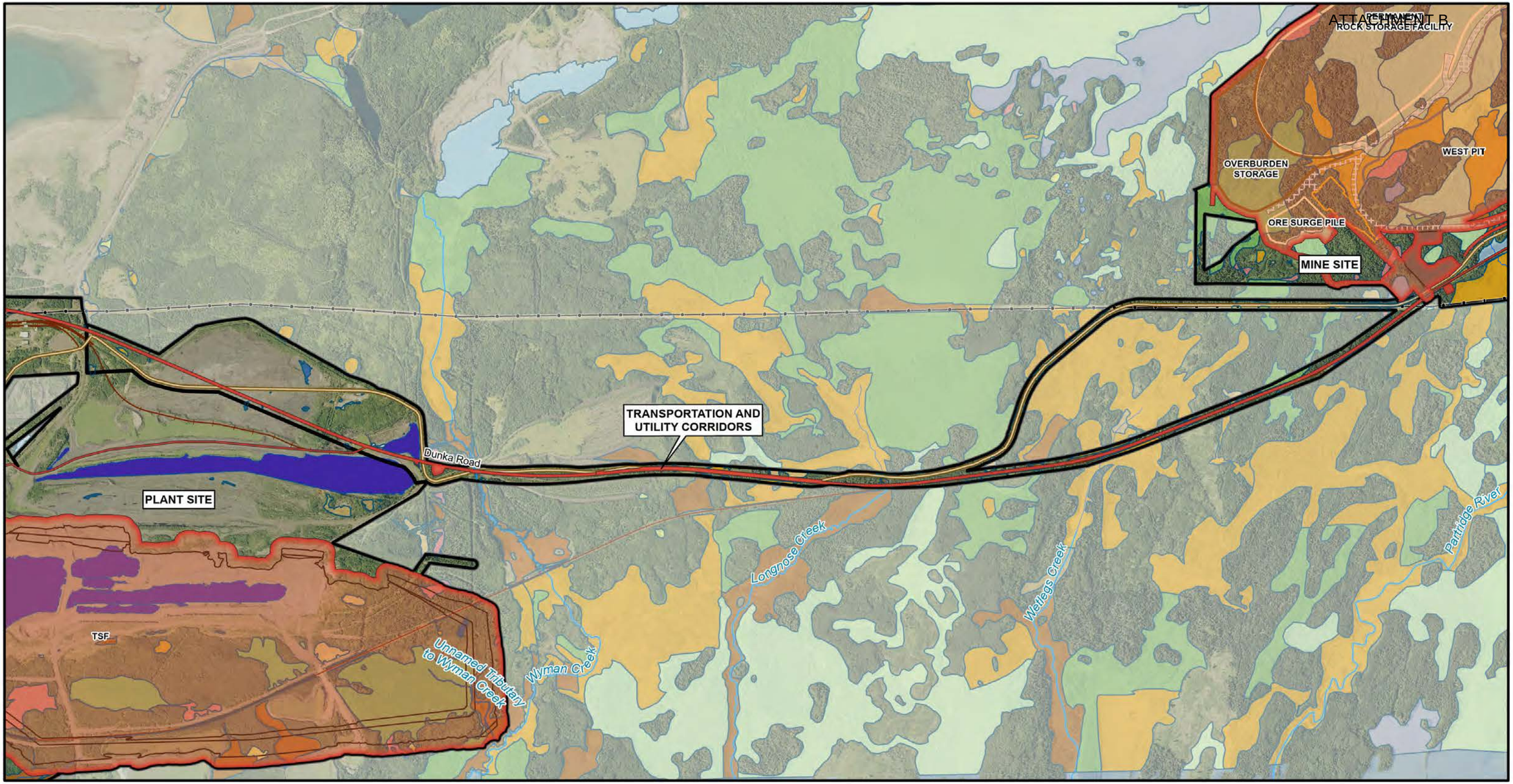
Dominant Eggers & Reed (2015) Wetland Community Type

- Alder Thicket
- Coniferous Bog
- Coniferous Swamp
- Deep Marsh
- Hardwood Swamp
- Open Bog
- Seasonally Flooded Basin
- Sedge Meadow, Fresh (Wet) Meadow
- Shallow Marsh
- Shallow, Open Water
- Shrub-Carr

N

0 2,000 4,000 Feet

Credits: 2024 60cm resolution imagery service from USDA FPAC-BC-GEO NAIP. Administrative, hydrographic, and transportation data from MnDNR, MNDOT, USGS.



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Large Figure 18
TUC Direct Wetland Impacts
2026 Section 404 Permit Application

NAD 1983 StatePlane Minnesota North FIPS 2201 Feet

DATE: July 29, 2026 | DRAWN BY: Barr Engineering Co., ARM2

- NorthMet Project Areas
- Impact Area
- Dunka Road
- Existing Railroads
- Electric Transmission Lines
- Public Waters Inventory (PWI) Watercourses
- National Hydrography Dataset (NHD) Rivers & Streams
- Deepwater Pit Lake
- National Wetlands Inventory (NWI)

Dominant Eggers & Reed (2015) Wetland Community Type

- Alder Thicket
- Coniferous Bog
- Coniferous Swamp
- Deep Marsh
- Hardwood Swamp
- Open Bog
- Seasonally Flooded Basin
- Sedge Meadow, Fresh (Wet) Meadow
- Shallow Marsh
- Shallow, Open Water
- Shrub-Carr

N

0 2,000 4,000 Feet

Credits: 2024 60cm resolution imagery service from USDA FPAC-BC-GEO NAIP. Administrative, hydrographic, and transportation data from MnDNR, MNDOT, USGS.