



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY

ST. PAUL DISTRICT, CORPS OF ENGINEERS

190 FIFTH STREET EAST, SUITE 401

ST. PAUL, MN 55101-1638

FEB 06 2007

Operations
Regulatory (MVP-1999-5528-JKA)

Mr. Dennis Gimmestad
State Historic Preservation Office
Minnesota Historical Society
345 Kellogg Boulevard West
St. Paul, Minnesota 55102-1906

Dear Mr. Gimmestad:

The St. Paul District, Corps of Engineers (Corps) has reviewed an archaeological survey report titled *Phase I Archaeological Survey, NorthMet Mine Impact Area, PolyMet Mining, St. Louis County, Minnesota*. The survey was conducted by Soils Consulting for Barr Engineering and included a portion of the PolyMet project area located in sections 1, 2, 3, 4, 9, 10, and 11 of Township 59 North, Range 13 West, St. Louis County. A copy of the report is enclosed for your review (SHPO Number 2005-2070).

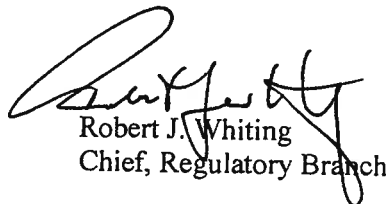
The investigation focused on the mine pit and stock pile areas as shown on Figure 1. Prior to conducting the fieldwork, Bradley Johnson of the Corps and Dr. Anfinson of your office agreed that full archaeological survey coverage would not be required and that a sampling strategy would be appropriate. Survey areas were selected by eliminating areas investigated by Foth & Van Dyke in 1999, areas heavily disturbed by logging, and areas deemed to have a lower archaeological research potential based on the criteria presented in the report. Logging disturbance was verified in the field.

Two properties were identified. The Knot logging camp, which is out of the project area identified on Figure 1 and the NorthMet Site, a pre-contact archaeological site that was located in Survey Sample Area 3. As project planning continues, the Corps will coordinate a determination of effect for both of these properties.

We believe that the methods used for the investigation were both appropriate and thorough. We believe that no further phase I archaeological investigation is needed for the area identified in Figure 1. This does not address other portions of the project area or the potential for a historic mining property, only further archaeological investigation of the area identified in Figure 1.

Please review the enclosed report and provide us with your comments on this investigation. If you have any questions, please call Mr. Bradley Johnson at (651) 290-5250.

Sincerely,


Robert J. Whiting
Chief, Regulatory Branch

Enclosure

Copy furnished:

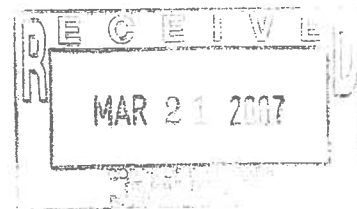
Ms. Jacquie Payette, Environmental Resources Management (without enclosure)
Mr. John Borovsky, Barr Engineering (without enclosure)
Mr. Stuart Arkley, Minnesota Department of Natural Resources (without enclosure)



MINNESOTA HISTORICAL SOCIETY

State Historic Preservation Office

March 19, 2007



Mr. Robert Whiting, Chief
Regulatory Branch
U.S. Army Corps of Engineers
190 5th Street East
St. Paul, MN 55101-1638

Re: MVP-1999-5528-JKA, Polymet Mining
Saint Louis County
SHPO Number: 2005-2070

Dear Mr. Whiting:

Thank you for submitting a copy of the report of the Phase I archaeological survey for a portion of the above referenced project area. The survey identified two sites.

We look forward to working with you to address the evaluation and assessment of effect for these sites, and to address the identification needs in other areas of the project as well.

Contact us at 651-259-3456 with questions or concerns.

Sincerely,

Dennis A. Gimmestad
Government Programs & Compliance Officer

cc: Brad Johnson, USACE



DEPARTMENT OF THE ARMY

ST. PAUL DISTRICT, CORPS OF ENGINEERS
ARMY CORPS OF ENGINEERS CENTRE
190 FIFTH STREET EAST
ST. PAUL, MN 55101-1638

REPLY TO
ATTENTION OF

JAN 09 2009

Operations - Regulatory (1999-5528-JKA)

SHPO Number 2005-2070

Mr. Dennis Gimmestad
State Historic Preservation Office
Minnesota Historical Society
345 Kellogg Boulevard West
St. Paul, Minnesota 55102-1906

Dear Mr. Gimmestad:

Enclosed for your review are cultural resource reports; *Phase I Evaluation and Historic Context Study, PolyMet Mining Corporation, Northmet Project, Hoyt Lakes, St. Louis County Minnesota* completed by Landscape Research LLC, and *Phase I Archaeological Survey of Dunka Road Expansion and Substation and Phase II Archaeological Evaluation of NorthMet Archaeological Site, NorthMet Mine Impact Area, PolyMet Mining, St. Louis County, Minnesota* completed by Soils Consulting. Both reports were completed for Barr Engineering on behalf of the PolyMet Mining, Inc. The proposed Polymet project is located in multiple sections of (T 59 N, R 13 W), (T 59 N, R 14 W) and (T 60 N, R 13 W) approximately 5 miles north of Hoyt Lakes in St. Louis County.

To begin our review, we identified a number of areas requiring cultural resource investigation. The mine pit and stockpile area referred to as the NorthMet Impact Area, Dunka Road corridor, and the substation location would require investigation primarily to identify archaeological resources, but also other property types, such as historic architectural properties or traditional cultural properties (TCP) that may be present. The former Erie Mining Company site including the plant site, tailing basins, area shop locations, and transportation features had little, or no, archaeological or TCP potential because of extensive disturbance as a result of past mining and ore processing activity. However, the former Erie Mining Company site appeared to have the potential to qualify for listing on the National Register of Historic Places (NRHP) as a historic mining property. Therefore, a context in which to assess the significance of this property was developed and the eligibility of this property was evaluated.

In previous correspondence with your office we have provided *Phase I Archaeological Survey, NorthMet Mine Impact Area, PolyMet Mining, St. Louis County, Minnesota* completed by Soils Consulting. As a result of that investigation, the NorthMet archaeological site was identified. The enclosed report completed by Soils Consulting provides an evaluation of the NorthMet archaeological site, as well as the results of the phase I archaeological investigation of Dunka Road and the proposed electrical substation location. The enclosed report completed by Landscape Research LLC primarily addresses the eligibility of the former Erie Mining Company property.

We agree with the conclusions presented in the reports. To summarize, this would mean that there are no archaeological sites or historic architectural properties that qualify for listing on the NRHP within the NorthMet Impact area, along the Dunka Road corridor, or at the substation location and that no further cultural resource investigations for archaeological or architectural

resources would be necessary. The former Erie Mining Company property does not qualify for listing on the NRHP as a historic mining district, but the Concentrator Building and portions of the mine/plant track should be considered eligible for listing on the NRHP.

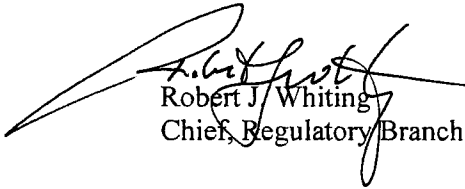
Additional information that we have received verbally from the applicant suggest that the project as planed will result in considerable modifications to the Concentrator Building and the addition of new buildings and structures to the surrounding plant site. We believe that these changes will diminish the integrity of these mining properties and constitute an adverse effect.

Consultation is ongoing with the Grand Portage Band, the Fond du Lac Band, and the Bois Forte Band to establish the Area Potential Effects for TCPs as well as the identification efforts to be undertaken for those properties. We will coordinate the results of those efforts with your office as they become available.

Please review the enclosed reports and provide us with your comments on the investigations as well as the determination of eligibility for the Concentrator Building and portions of the mine and plant track. If you have any questions, please call Mr. Bradley Johnson at (651) 290-5250.

Sincerely,

Enclosure



Robert J. Whiting
Chief, Regulatory Branch

Copy furnished without enclosures:

Mr. Jim Scott, Polymet Mining Corporation
Ms. Jacquie Payette, Environmental Resources Management
Mr. John Borovsky, Barr Engineering
Mr. Stuart Arkley, Minnesota Department of Natural Resources
Mr. LeRoy DeFoe, Cultural Resource Specialist, Fond du Lac Band
Ms. Vicky Raske, Tribal Historic Preservation Officer, Grand Portage Band
Ms. Rose Berens, Tribal Historic Preservation Officer, Bois Fort Band
Mr. Les Peterson, Tribal Archaeologist, Red Lake Band



State Historic Preservation Office

February 12, 2009

Mr. Robert Whiting
Chief, Regulatory Branch
U.S. Army Corps of Engineers
190 5th Street East
St. Paul, MN 55101-1638

Re: 1999-5528-JKA
Polymet Mining project – open pit mine and associated construction
Saint Louis County
SHPO Number: 2005-2070

Dear Mr. Whiting:

Thank you for the opportunity to review and comment on the above project. It has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and the Procedures of the Advisory Council on Historic Preservation (36CFR800).

We concur with your determination that the Erie Mining Company Concentrator Building meets National Register criteria, and that the project has potential adverse effects on this property.

We have not yet completed our review of the report of the archaeological investigations.

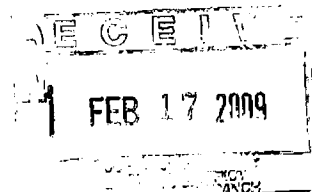
We look forward to consulting with you to resolve the effects of this project. Contact us at 651-259-3456 with questions or concerns.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Britta L. Bloomberg'.

Britta L. Bloomberg
Deputy State Historic Preservation Officer

cc: Tom Cinadr, SHPO

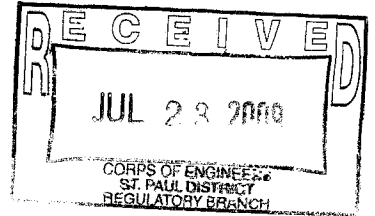




State Historic Preservation Office

July 22, 2009

Ms. Tamara Cameron
Chief, Regulatory Branch
U.S. Army Corps of Engineers
190 5th Street East, Suite 401
St. Paul, MN 55101-1638



Re: 1999-5528-JKA, Polymet Mining Project
Saint Louis County
SHPO Number: 2005-2070

Dear Ms. Cameron:

We previously wrote to you concerning this project on February 12, 2009 and May 20, 2009. We had not completed our review of the archaeological investigations at that time. We have now completed our review of the archaeological investigations completed by Soils Consulting. We concur that the Northmet Site is not eligible.

We look forward to working with you to complete this review. Contact us at 651-259-3456 with questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Britta L. Bloomberg'.

Britta L. Bloomberg
Deputy State Historic Preservation Officer

cc: Brad Johnson, USACE