



**Highland
Copper**

Copperwood
Project

How will the Copperwood project ensure it protects Redside Dace and other endangered species?

Through the Copperwood permitting process with EGLE, the project completed extensive analysis of the Redside Dace population and other flora and fauna species and is confident there will be no impact. A number of important factors allow us to draw this conclusion, which has been reviewed and supported by EGLE:

- 1) The stream receiving water discharge was specifically selected as it has no Redside Dace or other aquatic species populations.
- 2) Discharged water will be treated to both remove contaminants and restore natural qualities important to aquatic life downstream.
- 3) The treated discharge itself, as well as multiple surface water locations across the site, will be consistently monitored for dozens of contaminants to ensure that water quality is not adversely impacted and remains within permitted and safe limits.
- 4) The treated discharge will be regularly tested for safety to freshwater organisms. The regular testing, and related public disclosure, should generate confidence that the aquatic health downstream is being consistently maintained.

How does Copperwood ensure that discharged water is safe for aquatic life?

The EGLE permit dictates the water quality of the discharge, not only addressing water cleanliness, but also water quality for aquatic life. The water treatment plant will remove industrial contaminants and condition the water to ensure it meets Whole Effluent Toxicity (WET) testing requirements. Treated effluent must comply with this biological testing to show it is safe for aquatic organisms, independently of compliance with the individual contaminant limits. Before discharge, the treated water will be conditioned to restore appropriate hardness, alkalinity, pH stability, and overall ionic balance comparable to the natural receiving water chemistry. This is standard practice and is necessary to ensure the effluent meets WET test performance and is protective of downstream aquatic life.

The discharged water further assimilates to the environment as it flows more than a mile downstream to a local creek, gaining natural water inputs of mineral and biological components. Lastly, aquatics will be surveyed annually to monitor the health and sustainability of the aquatic ecosystem.

How much water discharge will there be?

The Copperwood Project anticipates routinely discharging below the primary permitted 0.5 million gallons per day, which is the maximum allowable discharge. A high-end allowable discharge enables the maximum environmental impact to be understood, especially as it pertains to aquatic life downstream.

How will Copperwood monitor to ensure regional water is safe for aquatic life?

Per EGLE regulations and like all discharging facilities, Copperwood has obligations to consistently monitor, and publicly report, discharge water quality. MiEnviro is the portal through which Discharge Monitoring Reports (DMRs) and regulatory compliance correspondence are posted and are visible to the public. Annual flora, fauna, and aquatics monitoring reports are posted on EGLE website and are also visible to the public.

Why is the NPDES permit being renewed?

As with all NPDES permits, they require routine renewals every five years. The renewal exercise incorporates updated water quality standards and implementation of various regional and/or statewide Clean Water Act efforts. The current Copperwood draft permit has been minimally updated from the previous permit approved by EGLE with a revised Ammonia Nitrogen permit limit reflecting the updated EGLE water quality standard.

How is the Copperwood Project mitigating environmental impacts?

Protecting the environment is our top priority. We are committed to sustainable development initiatives that foster environmental stewardship, community resilience and economic opportunity. Here are a few things we have done to mitigate the environmental impacts of the project:

- Constructed approximately 18 acres of new wetland to mitigate for impacted wetland. Copperwood is also establishing a 717-acre wetland preservation area off-site.
- Planted more than 30 different species of wetland sedges, grasses, rushes, wildflowers and trees as part of the on-site created wetland and stream habitat.
- Planted over 20,000 trees and 14,000 live stakes as part of the Stream Mitigation Project.
- Replaced undersized culverts on Bluff Creek and constructed a new bridge on Choate Road to improve stream habitat quality for fish (trout) and wildlife.

Does the Copperwood project have local support?

Yes, given Copperwood's strong track record of environmental compliance, and the stringent Michigan legislation which it has demonstrated it will comply with, the project has strong regional support. The Copperwood project has received 22 formal resolutions of support from surrounding municipalities, townships, counties and Boards including the Wakefield Township, Ironwood and Gogebic County, where Copperwood resides.