SLR Consulting (Canada) Ltd.
100 Stone Road West, Suite 201, Guelph, ON N1G 5L3

September 9, 2025

RECEIVED
SEPTEMBER 10, 2025
TOWNSHIP OF ARMOUR

Attention: Ina Lila
SolarBank Corporation
505 Consumers Road, Suite 803
North York, ON M2J 4B8

SLR Project No.: 209.065266.00001

Revision: 01

RE: Environmental Impact Study Addendum for 219 Pegg's Mountain Road, Township of Armour

SLR Consulting (Canada) Ltd. (SLR) submitted a Scoped Environmental Impact Study (EIS) on behalf of SolarBank Corporation for the property at 219 Pegg's Mountain Road in the Township of Armour ('Subject Property') that was dated July 15, 2025. This memo addresses the comments provided by the Township of Armour's peer reviewer, TULLOCH Engineering ('TULLOCH'; dated August 14, 2025) in response to the Scoped EIS submission (**Section 1**). Relevant policies, existing environmental conditions, and the proposed development are summarized in the 2025 EIS (SLR 2025). This memo is to be read in conjunction with SLR's 2025 EIS as part of providing responses to peer review comments.

1.0 Environmental Impact Study Comments

1.1 TULLOCH Comments

The following peer review comments were made by TULLOCH on behalf of the Township of Armour. SLR ecologists have provided a response for each comment below.

1. *In general, the EIS completed by SLR is well done and well proportioned to the size and scale of the proposed BESS facility*.
    - Acknowledged.
2. *Section 1 states* "For the purpose of this EIS, the Subject Property is further subdivided into a Study Area which contains the area of proposed development and the adjacent lands within 120 m of the proposed development." *This is an appropriate Study Area. We recommend this area be added to Figures 2 and 3 to illustrate the scope of the study effort on Site.*
    - The Study Area (i.e., the area of proposed development and the adjacent lands within 120 m of the proposed development) has been added to Figures 2 and 3 (see Figures attached).
3. *Table 4, Row 3 states* "Through acoustic monitoring, it is known that SAR bats are using the Study Area for roosting in low abundances. To avoid impacts to these species it is recommended that vegetation clearing not occur during the bat maternity roosting season (generally occurs annually between April 1 to October 31). Appropriate mitigation measures and approvals should be determined in consultation with the MECP." *We recommend that the determination of appropriate mitigation measures and approvals be included in this EIS. Compliance with the Endangered Species Act ('ESA') is a*

proponent-driven process and the Species at Risk Branch of the Ministry of the Environment, Conservation and Parks ('MECP') should only be consulted where contravention of the ESA is unknown or considered likely. Based on recent correspondence with the MECP, TULLOCH is aware that the Ministry is currently quoting 7 to 12 months to undertake a project review (via an Information Gathering Form). These reviews are not a prerequisite of ESA compliance in many instances. The EIS should establish if undertaking such a review (and incurring these delays) is warranted. The choice to pursue a Ministry review, or not, should be rooted in whether the project is ***likely*** *or* ***unlikely*** *to contravene the ESA once all mitigations and avoidances are in place. TULLOCH offers the following comments to assist SLR in making this determination*…

- Acknowledged. SLR recognizes that compliance with the ESA is proponent lead and have advised accordingly. An assessment of Species at Risk (SAR) Bats and recommended mitigation measures memo has been drafted for the proponent to ensure ESA compliance
- We are in agreement that the use of the site is not indicative of roosting habitat for bats and could also be an indication of foraging or commuting between habitats. Due to the location of the acoustic detector in relation to potential roosting habitat, a conservative approach was taken. The following are changes to the original EIS:
  - Due to separate project consultations with the MECP and direction provided to SLR, it is now advised that tree removals be conducted outside the April 1 to November 30 window to avoid impacts to migratory SAR bats (incl. Hoary and Silver-haired Bats).
  - The installation of one "Rocket Box" style bat box be installed at the project site following vegetation clearing in compensation for the loss of potential roosting habitat.

4. *Section 7.1.2 states* "The establishment and spread of invasive plant species can have substantial negative impacts on ecosystem function and can incur significant costs to eradicate or control. Vehicles and machinery should be properly cleaned following the procedures outlined in the Clean Equipment Protocol for Industry (Ontario Invasive Plant Council, 2013) prior to entering and leaving the Subject Property." *We agree with this statement but note that the mitigation should be included in Section 8 to ensure it is not overlooked*.
   - Acknowledged. This will be further reiterated to the client to inform the contractor (e.g., information regarding invasive species control added to the construction tender documents).

Closure

Regards,

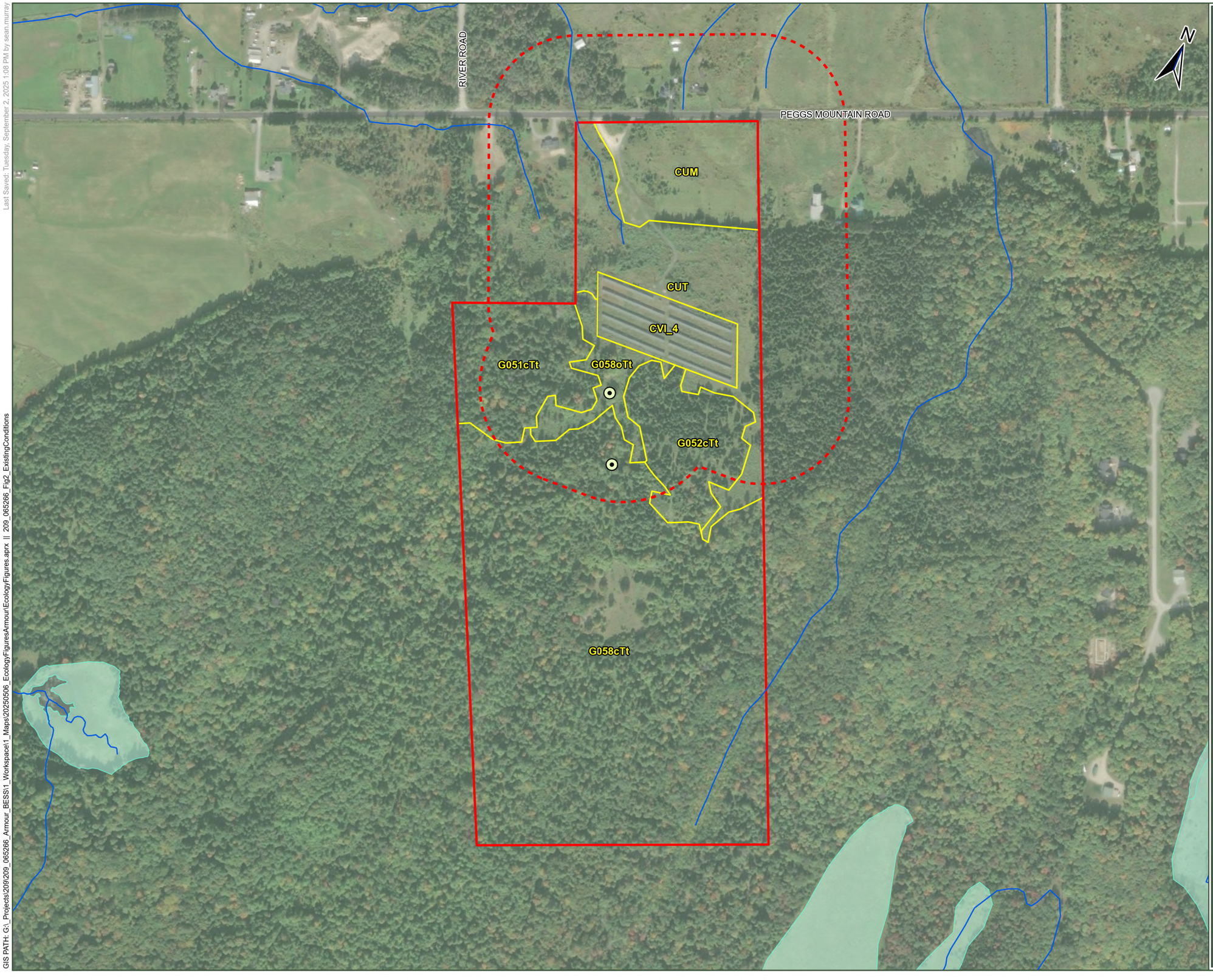
SLR Consulting (Canada) Ltd.

Lucas McLennan, B.Sc.
Ecologist
email

Carlene Perkin, B.Sc.
Ecologist, ISA Certified Arborist

Dirk Janas, B.Sc.
Technical Director, Terrestrial Ecology

Attachments Figures



LEGEND:

- SNAG TREE (SUGAR MAPLE)
- WATERCOURSE[1]
- ECOLOGICAL LAND CLASSIFICATION (ELC)
- WETLAND - UNEVALUATED AS PER OWES[1]
- SITE LOCATION
- STUDY AREA

ELC Legend

CUM - Cultural Meadow
CUT - Cultural Thicket
CVI - Power Generation
G051cTt - Dry - Fresh, Coarse: Cedar - Hemlock Conifer
G052cTt - Dry - Fresh, Coarse: Spruce - Fir Conifer
G058cTt/G058oTt - Dry - Fresh, Coarse: Maple Hardwood

NOTES:
NOTE 1 - BASEMAP DATA PROVIDED BY ONTARIO'S MINISTRY OF NATURAL RESOURCES AND FORESTRY (ONTARIO HYDRO NETWORK AND ROAD SEGMENTS)

SERVICE LAYER CREDITS: MAXAR, MICROSOFT (2024)

0 50 100 150 200 250 m

SCALE: 1:5,000
PAGE SIZE 11 x 17
NAD 1983 UTM Zone 17N
THIS MAP IS FOR CONCEPTUAL PURPOSES ONLY AND SHOULD NOT BE USED FOR NAVIGATION

SOLARBANK CORPORATION
219 PEGGS MOUNTAIN ROAD IN ARMOUR
ONTARIO, CANADA

ELT1 BESS SAR SCREENING

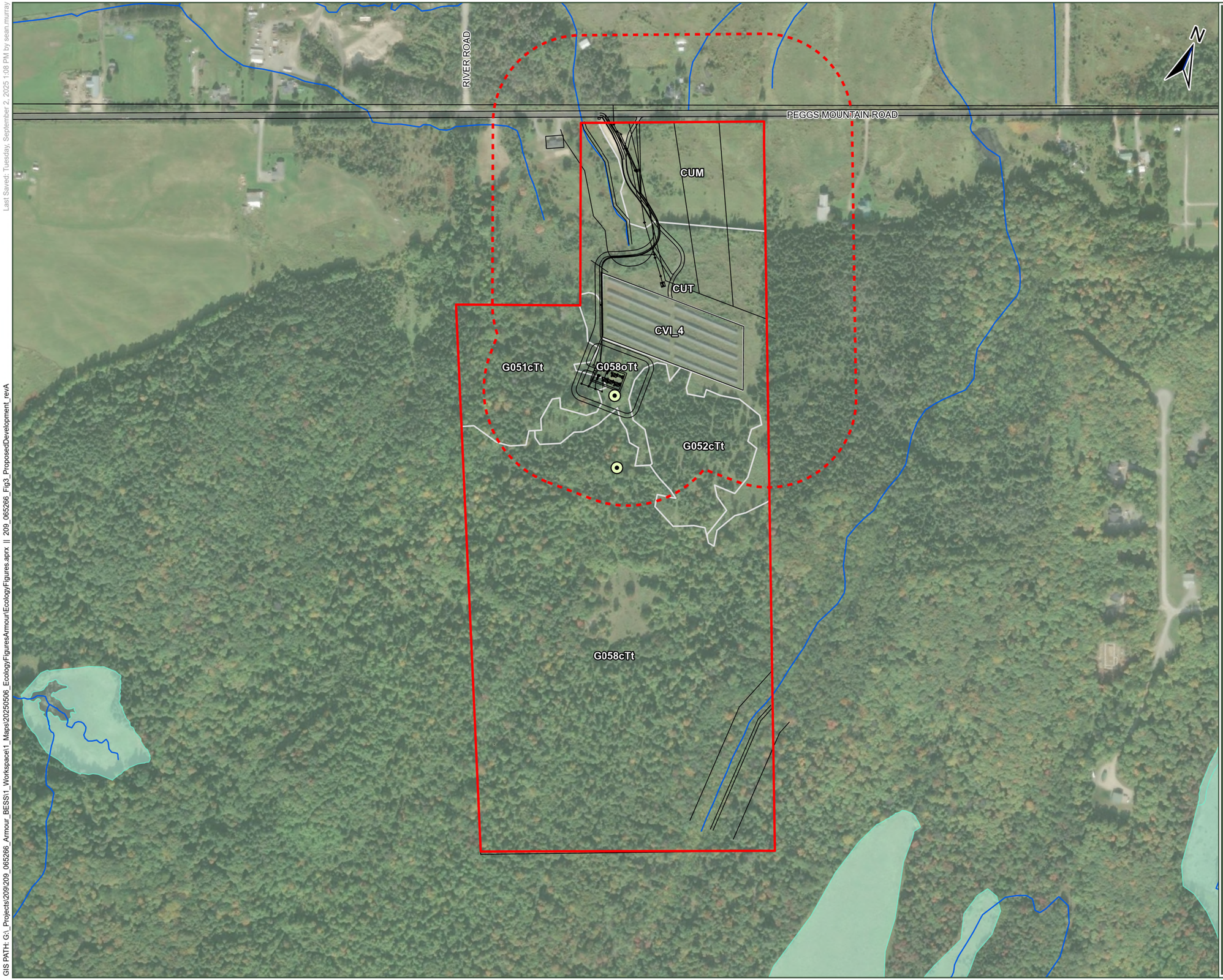
EXISTING ENVIRONMENTAL CONDITIONS

SLR

FIGURE NO:
2

DATE: September 2, 2025

PROJECT NO: 209.065266.00001



LEGEND:

- SNAG TREE (SUGAR MAPLE)
- DEVELOPMENT PLAN
- WATERCOURSE
- PROVINCIALLY SIGNIFICANT WETLAND
- ECOLOGICAL LAND CLASSIFICATION (ELC)
- SITE LOCATION
- STUDY AREA

ELC Legend

CUM - Cultural Meadow
CUT - Cultural Thicket
CVI - Power Generation
G051cTt - Dry - Fresh, Coarse: Cedar - Hemlock Conifer
G052cTt - Dry - Fresh, Coarse: Spruce - Fir Conifer
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SOLARBANK CORPORATION
219 PEGGS MOUNTAIN ROAD IN ARMOUR
ONTARIO, CANADA

ELT1 BESS SAR SCREENING

PROPOSED DEVELOPMENT

SLR

FIGURE NO:
3

DATE: September 2, 2025

PROJECT NO: 209.065266.00001

Last Saved: Tuesday, September 2, 2025 1:08 PM by sean.murray

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March 2005

Two-chamber Rocket Box Bat House Plans

Merlin Tuttle
Bat Conservation International

Mark Kiser
Bat Conservation International

Selena Kiser
Bat Conservation International

Two-chamber Rocket Box

Materials (makes one house)

2" diameter (2⅜" outside diameter) steel pole, 20' long
Two 1" x 4" (¾" x 3½" finished) x 8' boards*
Two 1" x 8" (¾" x 7¼" finished) x 8' boards*
Two 1" x 10" (¾" x 9¼" finished) x 6' boards*
24" x 24" x ¾" piece of AC exterior plywood
Box of 100 exterior-grade screws, 1⅝"
Box of 100 exterior-grade screws, 1¼"
16 to 32 exterior-grade screws, 2"
20 to 30 roofing nails, ⅞"
One quart water-based primer, exterior grade
Two quarts flat, water-based stain or paint, exterior grade
Asphalt shingles or dark galvanized metal
One tube paintable latex caulk
Two ¼" x 4½" carriage bolts, washers and nuts

** Western red cedar or poplar preferred*

Recommended tools

Table saw or circular saw
Caulk gun
Hammer
Tape measure
Square
Jigsaw, keyhole saw or router
Sandpaper or sander
Rasp or wood file
Variable-speed reversing drill
1½" hole saw or spade bit
⅛" and ¼" drill bits
Screwdriver bit for drill

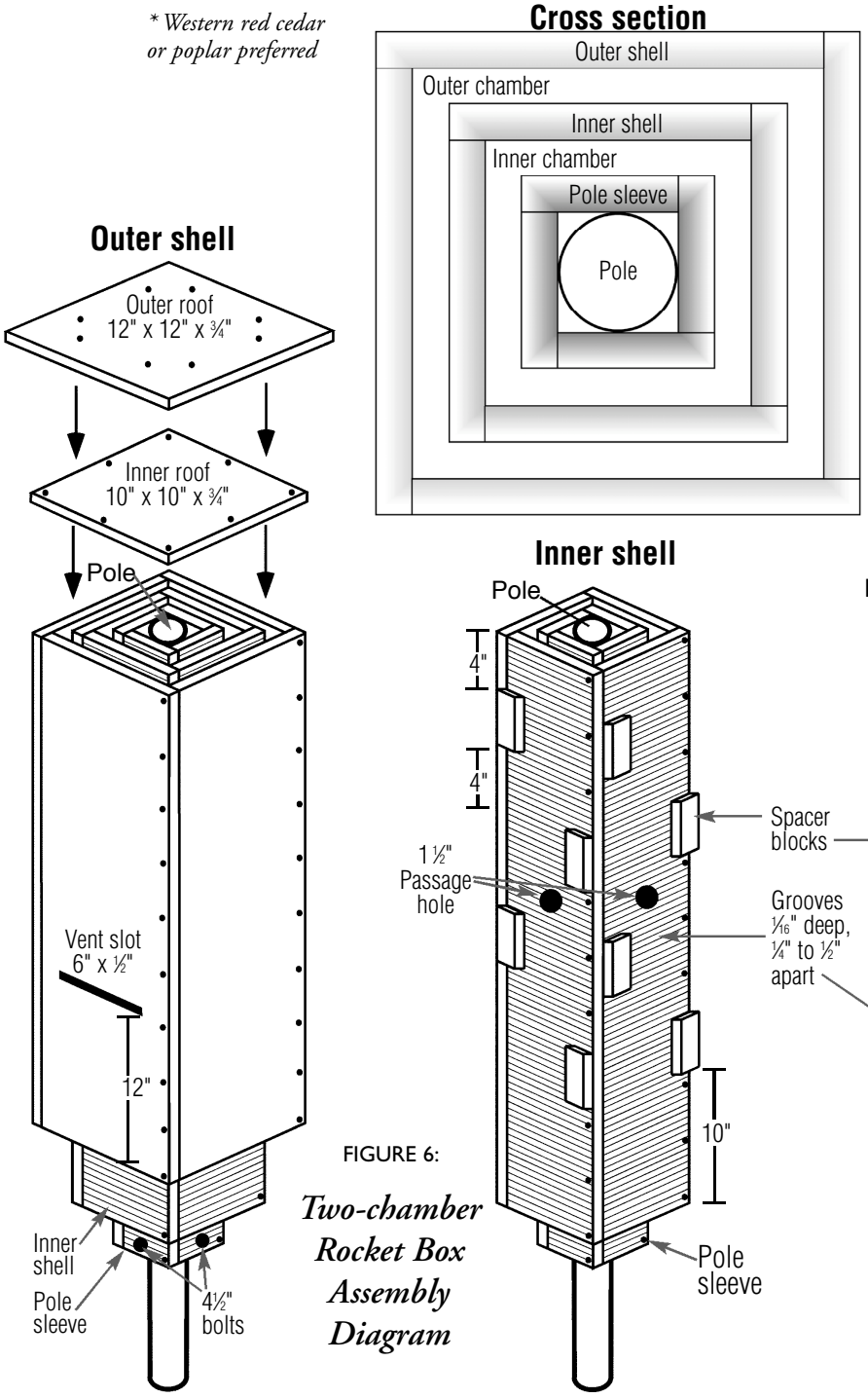

FIGURE 6:

Two-chamber Rocket Box Assembly Diagram

Construction

1. Measure, mark and cut out parts according to Figure 7. Dimensions must be exact for correct fit. Cut out two vent slots and four passage holes as shown.
2. Cut 1/16"-deep horizontal grooves ¼" to ½" apart on one side of all 36" and 45" boards and on both sides of all 42" boards. Sand to remove splinters.
3. Drill two ⅛" holes through each ¾" x 1½" x 4" spacer block to prevent splitting.
4. Assemble four pole sleeve boards into a hollow, square box as shown using 1⅝" screws and caulk. Pre-drill holes to prevent splitting. Countersinking holes may also help.

5. Attach spacer blocks to pole sleeve as shown (four per side) using two 1¼" screws per block. Bottom spacer blocks are 9" up from bottom of pole sleeve. Top spacer blocks are 5" from top. Alternate spacer blocks on left and right sides, 5" apart.
6. Assemble four inner shell boards into a hollow, square box as in step 4.
7. Slide pole sleeve into inner shell until top edges are flush. Bat passage holes will be towards the top. Mark location of spacer blocks. Secure inner shell to pole sleeve with 2" screws through the spacer blocks to ensure no screws protrude into roosting chambers. Pre-drill holes first to avoid splitting spacer blocks (countersinking holes may also help).
8. Attach spacer blocks (4 per side) to inner shell as shown, using two 1¼" screws per block. Bottom spacer blocks are 10" up from the bottom edge of the inner shell. Top spacers are 4" from top. Alternate spacers left and right sides, 4" apart.
9. Assemble four outer-shell boards into a hollow, square box as in step 4. Vent slots are on opposing sides and oriented towards the bottom.
10. Slide finished outer shell over inner shell, so that 6" of inner shell protrudes below outer shell. Mark locations of spacer blocks. Secure outer shell to inner shell as in step 7 (pre-drill holes first). Ensure that no screws protrude into the roosting chambers.
11. Caulking first, attach inner roof to box with 1¼" screws. Carefully drive screws into top edges of shells to prevent screws from entering roosting chambers.
12. Center and attach outer roof to inner roof with 1¼" screws, caulking first.
13. Paint or stain exterior three times (use primer for first coat). Cover roof with shingles or dark galvanized metal.
14. Slide completed rocket box over pole. One inch up from the bottom edge of pole sleeve, drill a ¼" hole all the way through pole and sleeve. Rotate box and pole 90° and drill another ¼" hole, 2 inches from the bottom, through pole and sleeve. Secure box to pole with two 4½" bolts, washers and nuts. Orient vent slots north and south during installation.

Optional modifications to the rocket box

1. For extra mounting height, insert a 4½" bolt and nut about halfway up through pole sleeve after completing step 5.
2. For extra heat-holding capacity, create a compartment in upper half of pole sleeve with a 2½"-square piece of leftover plywood. Fill upper half of sleeve with sand, gravel or dirt, and seal with another piece of plywood flush with top.
3. In warmer climates, a larger outer roof with more overhang can be used for additional shading.

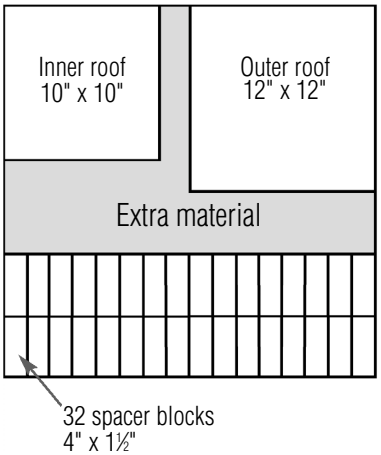

FIGURE 7
Two-chamber Rocket Box Sawing Diagram