



Memorandum

Date: May 27, 2025 Memo No.: 1

Project Name: Peer Review Responses - 219 Peggs Mountain Road, Burk's Falls, Ontario Project No.: GTR-23015113-A5

Written By: Amanda Catenaro

Subject: Peer Review Responses - Phase One Environmental Site Assessment, 219 Peggs Mountain Road, Burk's Falls, Ontario

To: Ina Lila, Solarbank Corp

Distribution: Township of Armour, Tulloch
Environmental Consultants

NOTICE OF CONFIDENTIALITY AND PRIVILEGE

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EXP is pleased to present our response to the peer review comments provided on May 15, 2025 by the Township of Armour. The table attached in Appendix A provides our response to each of the comments. The accompanying Phase One Environmental Site Assessment Report, originated on January 23, 2024 and revised on May 27, 2025 has been revised to reflect the requested changes.

Sincerely,

EXP Services Inc.

A handwritten signature in black ink, appearing to read "A. Catenaro", is positioned above the printed name.

Amanda Catenaro, M.E.Sc., P.Geo., QP_{ESA}
Senior Project Manager
Environmental Services

Appendix A: Comment Matrix

Comment	Section/Page Number	Report Statement	EXP response
3	Section 4.3.2 (Topography, Hydrology, and Geology)	The Magnetawan River is located approx. 900m north of the Site	EXP has amended distance to 1,400m throughout report and appendices (Section 4.3.2 of report, Section 1.3 of CSM, Table I)
9	1- Executive Summary, pg. 4	It is generated that the environmental management and housekeeping practices were reviewed as part of this assessment insofar as they could impact the environmental condition of the site. However a detailed review of regulatory compliance issues was beyond the scope of the investigation	This is our legal wording to indicate that we do not complete asbestos, noise, lead, or mercury studies as part of our environmental assessment, as this is carried out by a building inspection or other investigations. Clarity was provided in the wording of the executive summary
10	1- Executive Summary, pg. 4	Based on the findings of the Phase One ESA, and works previously completed by EXP, no APECs were identified at the Site	APECs and PCAs has been defined in the executive summary. A table outlining all the PCAs and if they result in APECs has been added to the executive summary
11	Introductions, pg. 5	It is EXP's understanding that the Client intends to develop the northern portion of the Site with a Battery Energy Storage System (BESS) as continued industrial land use. It is noted that the development will include a concrete slab on-grade structure with associated underground utility lines and small building structures to house the equipment	It is standard protocol in our reports to discuss potential future use to indicate what potential site condition standards apply to the Site, if a Phase II is applicable. It also is meant for EXP to acknowledge an understanding if the purpose of the report (why it is required). This statement has been left in
12	4.1.1 Phase One Study Area Determination, pg.8	The Phase One Study Area and a Surrounding Land Use Plan are shown on Figure 2.	The phase one study area includes any municipal addresses (the entire property) within 250m of the Site , even when only a part of that property is actually located within 250 m, as a conservative measure. However, EXP agrees that only showing a 250m radius from the Site is more in line with O.Reg. 153/04. Figure 2 has been revised and discussion is provided in section 4.1.1. "Please note that when only part of a property was present within 250 metres of the Site boundaries, only that portion of the municipal address is included in the Phase One Study area. This is because any items occurring more than 250 metres from the Site boundary are unlikely to migrate to the Site. "
13	4.3.1 Aerial Photographs	A solar farm is observed on the Site in 2020. However, it is noted that the solar farm itself is not considered to pose an environmental concern to soil and groundwater at the Site. Furthermore, the transformer associated with the solar panels was pole mounted and not placed directly on the ground. This, it is not anticipated to directly impact soil or groundwater at the Site.	The client has confirmed that the transformers on-site to not contain PCBs. This is clarified throughout the report.

14	4.3.1 Aerial Photographs	PCA 2 (Other) - quarry	As discussed in item 12, the Phase One Study area was amended to only include portions of municipal addresses located within 250m of the Site boundaries. As such PCA 2 was removed as a PCA, given its location outside this study area. PCA has been removed from Sections 4.3.1, 4.6, and 6.4
15	4.3.3. Fill Materials	Given that the Site has never been developed prior to the installation of the solar farm structures and the elevation at the developed area does not appear to vary significantly relative to the surrounding properties, it was unlikely that fill material was brought to the Site for grading purposes and fill is not anticipated to be present at the Site.	EXP has confirmed during interviews with the Client that fill material was not introduced to Site during solar farm construction in 2019. This has been added throughout the report in section 4.3.3., 6.2.14. The granular A material observed along the pathway of the entrance is not considered soil material.
16	4.3.4 Water Bodies, pg. 12	Based on the review of available resources from the Ministry of Natural Resources and Forestry website on December 15, 2023, no areas of natural significance were identified at the Site or within 30 m of the Site	A table outlining each of the 9 areas of natural significance outlined in O.Reg. 153/04 is provided in Section 4.3.4.
17	Section 4.4 Site operating records pg. 13	There were no records of environmental significance available for review at the time of this Phase One ESA.	No records were available for review. This was clarified in Section 4.4.
18	Section 5 Interview, pg. 14	An interview was conducted with David Creasor, the site owner, via e-mail on December 5, 2023. David Creasor has been familiar with the site for 2 years.	The Client was further asked the questions, as indicated in the peer review comment. A response to each item is provided in Section 5.0 of the report.
19	Section 6.2.1. Site Description, pg. 15	Hydro poles were observed along the driveway	The hydro poles were present to hold up electrical wires. Transformers were not observed. This information has been updated in Sections 6.2.1 and 6.2.3 and in the CSM.
20	Section 6.2.13 Areas of Stained soil, pavement, and stressed vegetation, pg. 17	Consistent with this finding, no areas of significant staining of the soil or pavement were observed during the updated Site visit on April 25, 2025.	You may have received an outdated version of the report. An updated reconnaissance was conducted on April 25, 2025 (additional photos provided in Appendix J). No areas of significant staining of the soil or pavement were observed during the updated Site visit on April 25, 2025. Disturbed vegetation observed is likely just the granular A at the access road for the solar farm, consistent with typical use of the property. This is not considered an environmental concern and stressed vegetation was not observed during the updated Site visit.
21	Section 6.2.15 Fill and Debris, pg. 17	Fill material is typically brought to a property as a base for buildings and pavement areas. Fill can also be used to re-grade a property and to backfill excavations. No fill was observed to be present at the Site.	You may have received an outdated version of the report. An updated reconnaissance was conducted on April 25, 2025 (additional photos provided in Appendix J). Based on interviews with the Client, no fill was imported to the Site during construction of the solar farm. During the additional Site Visit on April 25, 2025, a small amount of gravel was observed at the entrance of the Site to reinforce the driveway from erosion. However, this is considered to be granular A material and not soils. This information has been provided in Section 6.2.15.
22	Section 7.1 Current and Past Uses, pg. 22	Based on our review of the inspection reports, previous environmental report, site interviews, and aerial photographs, the Site was first developed circa 2019 as the current solar farm.	Although the owner acquired the land in 2021, the solar farm was developed in 2019, based on interviews with the Client. This has been updated in Section 7.1 and throughout the report, including the CSM and Table II.

23	Section 7.2 - Potentially Contaminating Activities	No, the solar farm itself is not considered to pose an environmental concern to soil and groundwater at the Site. Furthermore, the transformer associated with the solar panels was pole mounted and not placed directly on the ground. This, it is not anticipated to directly impact soil or groundwater at the Site. The client has indicated that the transformer and operations of the solar farm does not contain PCBs during interviews.	Exp has added "The client has indicated that the transformer and operations of the solar farm does not contain PCBs during interviews. "to the discussion in this section. The Client has confirmed no PCBs are contained within their equipment
24	Section 7.2 - Potentially Contaminating Activities	No, based on the significant distance (500 m) separating the actual quarry o	EXP has removed PCA 2 as a PCA, given its distance from the Site, as discussed in comment 12 above.
25	Section 7.2 - Potentially Contaminating Activities	Lack of information on vegetation management.	No pesticides are used or have been used for maintenance on the Site. This was confirmed during interviews with the Client and is clarified in Section 5 of the report and as per comment 18 above.
26	Figures	Satellite Imagery Sources	Source and year of satellite images has been included in each of the images provided in Appendix I.
27	Appendix D	ERIS report	No changes - EXP created a larger area so that additional data could be searched as part of the ERIS, in order to avoid missing any PCAs
28	Appendix K	Phase One ESA	Changes have been made to the Phase One ESA, consistent with any changes to the report from any of the comments above. The CSM is mentioned in Section 7 and indicates to refer to Appendix K, since it is a lengthy document that we provide separately in our Phase One and Two reports.