POWERBANK

803-505 Consumer Rd
Toronto, ON M2J 4V8
Tel: 1 416 494 9559
www.powerbankcorp.com

January 7, 2026

To: Mayor Ward, Members of Armour Township Council, and the Municipal Clerk

Re: Township of Armour Public Meeting Summary of Public Comments & Applicant's Responses
219 Peggs Mountain Road, Township of Armour, ON P0A 1C0
Municipal File Numbers OPA-2025-01 and ZBA-2025-01
Powerbank Corporation

Powerbank Corporation has made applications for Official Plan and Zoning By-law Amendment to permit a Battery Energy Storage System ("BESS") facility at 219 Peggs Mountain Road, which were deemed complete on January 21, 2025. Since this time, there have been extensive peer reviews by technical experts to the submitted technical materials, as well as public engagement in the form of public meetings on April 7th, 2025, and November 18th, 2025. Beyond this, all submission materials, as well as peer review reports, have been posted publicly on the Township of Armour website, including both draft and final versions of these documents.

Through the public consultation for these applications, a number of comments and questions have been received by the community, both in writing and verbally at the above-noted meetings. The purpose of this letter is to summarize 'what we heard' at the November 18th, 2025 public meeting and the various themes that have emerged, and provide a response to comments received. This response to comments has been informed and supported by responses by both SLR Consulting and Fire and Risk Alliance, who have provided response to comments where appropriate, enclosed to this memo.

We believe that much of the concern expressed to date reflects a desire for clarity and transparency regarding the proposed BESS facility, its operation, and its potential impacts. Accordingly, this letter seeks to candidly address the key themes raised at the meeting, clarify how these matters have been considered through the technical review process, and identify where mitigation measures or conditions of approval have been proposed to address community concerns.

We request that this letter be publicly circulated to members of the public along with any and all other materials so that all may be fully informed.

Comments Received at the November 18, 2025 Public Meeting

Financial Transparency & Profit Concerns

The LT2 procurement is a competitive procurement from the IESO and contracts are only awarded to the proponents that have the most competitive price. This competitive dynamic limits overall margins, resulting in relatively modest returns on individual projects. By storing excess electricity during low-

803-505 Consumer Rd
Toronto, ON M2J 4V8
Tel: 1 416 494 9559
www.powerbankcorp.com

demand periods and releasing it back to the grid when demand peaks, the project helps to smooth out fluctuations in supply and demand. This contributes to lower and more stable electricity prices across the province by reducing costly demand spikes and decreasing reliance on gas-fired peaking plants which are both more expensive and more polluting. This ensures that taxpayer costs remain low. All required municipal fees including application fees and peer reviewer fees have been paid for by the applicant. Any further fees and charges to be required in the future will continue to be paid for by the applicant as the project progresses.

Fire Safety and Fire Department Risk

Keeping the fire department and community safe is of utmost priority to us. There is no specialized equipment required for this type of facility beyond what the department already uses today, something which has been confirmed by the Fire Chief.

We've also built several layers of safety into the design specifically to protect firefighters in the unlikely event they need to respond. This includes a 30 metre setback and a wraparound access road that will always be kept clear of vegetation to ensure safe distance and easy access.

In addition, we're providing in-person training for the fire department so they are fully familiar with the site, the equipment, and the appropriate response procedures. We're also installing a dry hydrant in the Fire Chief's preferred location, so any water required for firefighting does not draw from Armour Township's municipal supply.

Our goal is to support the fire department and make sure they have everything they need to respond safely and confidently, should they ever be called to the site, as evidenced by the technical materials submitted in support of the applications, including those related to Firefighter Training, Emergency Response Plan, and Hazard Mitigation Analysis.

Adequacy & Format of Training

The training will not only be in an online only format. We've used online sessions so far simply because the facility isn't built yet, but once the site is operational, the fire department will receive full in-person, classroom training and an on-site walk-through of the facility. That training will cover all site-specific hazards and response procedures in detail. We'll also provide refresher training as needed to keep everyone up to date. The firefighter training program is being refined for the specific site and project, and will be implemented in coordination with the Fire Chief and Town's peer review partners.

Increasing Fire Department Costs

The project's own taxes and contributions help cover incremental municipal costs of supporting new infrastructure. We do not expect residents to see higher taxes because of this project. On top of that, we as the developer are covering the cost of the dry hydrant, additional firefighter training, and air-monitoring equipment. The fire department will not need any new or specialized equipment beyond what they already

803-505 Consumer Rd
Toronto, ON M2J 4V8
Tel: 1 416 494 9559
www.powerbankcorp.com

use today. Under typical operating conditions, there is no need for fire department attendance at the site, and only under an unlikely and extreme event will there need to be a targeted response.

Safety Data Sheet Concerns & Firefighter Safety

Firefighter safety is paramount to us as well. The safety data sheets covers worst-case, direct-contact scenarios, even though those scenarios are not expected to be encountered in reality during an event on site due to the defensive tactics employed.

For our site, firefighters will not be operating in close proximity to the unit during an incident. They will be positioned 30 meters away from the facility and setting up equipment and monitoring conditions rather than performing close-contact fire suppression. Because of that distance, the types of exposures described in the SDS, such as direct contact with electrolyte, inhalation of vapors at the source, skin or eye contact, are not realistic scenarios for firefighters positioned at a controlled perimeter.

In other words, the SDS must include every potential exposure possibility, but the operational tactics implemented on site are designed to ensure that those exposure possibilities do not occur. Firefighters will not be in contact with electrolyte gel, will not be in an enclosed environment with vapors, and will not be performing actions that require close approach.

BESS Global Incident Examples

We cannot draw broad conclusions from specific BESS fire incidents. The fact that some fires have happened in the industry does not mean BESS technology is inherently unsafe. EVLO has never had a thermal runaway or fire at any of its sites, so there is no evidence suggesting this is a risk with their systems. More broadly, looking at data across all suppliers, the safety performance of grid-scale battery energy storage systems has continued to improve over the years.

Between 2018 and 2023, the global failure rate for BESS systems dropped by approximately 97%, despite a massive scale-up in deployment. For context, in 2018, global battery deployment was around 2 GW, with 16 reported failure incidents. By 2023, deployment surged to 52 GW, a 2,500% increase, while the number of incidents slightly declined to 15 on the year. This dramatic improvement in safety performance per gigawatt deployed reflects the increasing maturity of the technology and the industry's strong focus on safety, standards, and best practices.

Many of the incidents referenced involve systems installed before 2021, and those legacy installations cannot be compared to the safety performance of a modern BESS facility. Since 2021, the industry has undergone a major shift driven by new fire-safety standards and testing requirements. In addition, for all referenced events where data is available, air monitoring was conducted and no air quality concerns were identified at any point during the incidents and there was also no fire spread to adjacent containers. The reported statistics and events also include minor incidents and sites that are not representative of this project. This includes batteries in storage or transport that do not have continuous monitoring or integrated safety systems in place, as well as facilities that do not maintain comparable safety separation distances.

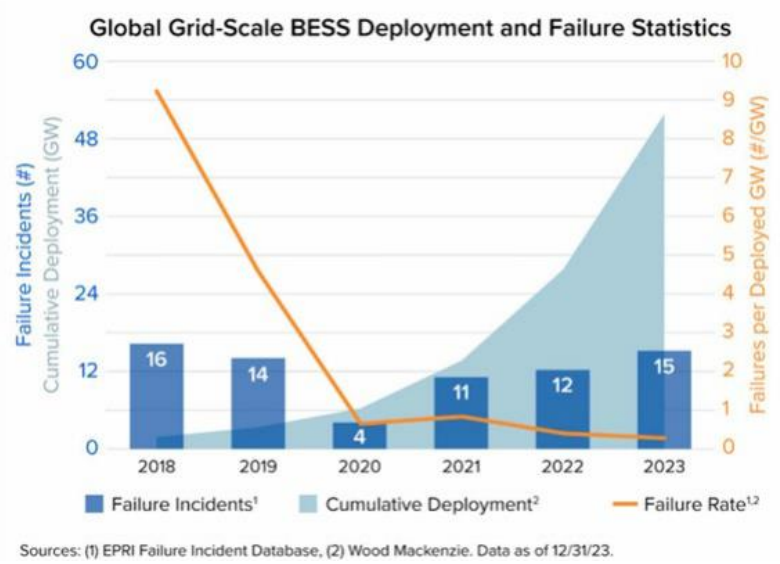
POWERBANK

803-505 Consumer Rd
Toronto, ON M2J 4V8
Tel: 1 416 494 9559
www.powerbankcorp.com

The adoption of NFPA 855, the National Fire Protection Association's installation standard for Energy Storage Systems, marked the first time that BESS siting, separation distances, fire-protection features, ventilation, and emergency response procedures were standardized across the industry. This standard directly addresses the root causes of earlier incidents through strict requirements around unit spacing, gas management and firefighter access.

At the same time, UL 9540A became widely used and, in practice, required for commercial and utility-scale BESS. While NFPA 855 does not mandate UL 9540A by name, it requires manufacturers to prove that a fire in one unit will not propagate to another. UL 9540A is the only recognized test method for demonstrating that non-propagation performance. As a result, all modern systems must undergo rigorous full-scale thermal-runaway testing, gas-release analysis, and fire-propagation assessment before they can be installed.

Together, NFPA 855 and UL 9540A testing have significantly raised the safety baseline for BESS. Modern installations include engineered fire-resistant enclosures, improved battery chemistries, advanced detection systems and built-in ventilation pathways for off-gassing. These safety features simply were not present in the pre-2021 systems involved in most of the historical incidents.



Fire Chief Report Comments

1. No battery is perfect and thermal runaway can happen in rare cases
    a. It is correct that no battery is perfect and thermal runaway can occur in rare cases. That's exactly why modern BESS facilities are built to strict standards like UL9540A and NFPA 855, which are designed to contain and control a single-cell failure so it doesn't spread. The systems include fire-resistant enclosures, gas detection, automatic shutdown, and 24/7 monitoring.

803-505 Consumer Rd
Toronto, ON M2J 4V8
Tel: 1 416 494 9559
www.powerbankcorp.com

   b. Therefore, while the risk can't be zero, the technology is engineered so that even a rare issue is predictable, contained, and safe for both the community and firefighters.
2. Conflicting tactics in the fire service on how to suppress a fire.
   a. Most experts agree that water for cooling, not suppression, is the best method and what has been agreed upon between Fire & Risk Alliance, Burks Falls Fire Department and EVLO, the battery supplier. No other agent to date has proven to be more effective than water.
3. If a fire occurs, we will have to commit most if not all our resources at this one site for a possible multiple day event.
   a. Firefighters would not be doing active, close-contact firefighting. Their role would be to use water only for exposure protection only where they would cool nearby units to prevent the fire from spreading. This can be done by setting up equipment along the access road and, once the setup is in place, it largely runs on its own.
   b. We're also installing a dry hydrant, which means the fire department will have a reliable water source that doesn't draw from the Township's water supply.
4. As a fire department, we must prepare for the worst case scenario.
   a. The safety measures for this site have been designed with this in mind as well. The facility is outdoors and set ~300 metres from the nearest homes, and was intentionally positioned at the back of the solar site to maximize separation. There's a 30-metre clearance and a wraparound access road that will be vegetation controlled. We're also installing a dry hydrant so there's a reliable water source year-round.
   b. On top of that, we've developed a detailed Emergency Response Plan and Hazard Mitigation Analysis, and we'll be providing in-person training not only for the Burk's Falls Fire Department, but for neighbouring departments as well.
5. The installation being in the MNRF high-risk area would like to point out to council that in our MNRF agreement we are responsible for any fires that start in this area.
   a. Thermal runaway associated with the failure of a lithium-ion battery cell does not produce embers that support fire spread to surrounding vegetation. However, we have still employed a conservative approach by establishing a 30-meter zone instead which will be cleared of vegetation to eliminate fire spread, therefore even in the rare case of a fire at the facility, it will not affect or spread to the surrounding forest.
6. I've asked for a water catchment system or storm system to be installed. This has been met with data suggesting it is not required.
   a. A comprehensive stormwater management plan is currently under development. This plan incorporates geomembrane lined ditches and a detention pond that can safely control any runoff from the site. There will also be an isolation valve to keep runoff in place if needed and we have also added an oil/grit separator to treat any runoff. In summary, even though not required, we have designed a comprehensive stormwater-management and pond system to enhance environmental protection.
7. Appendix B in the report states lithium battery electrolyte must not be dumped into drains or allowed to flow on ground or in any other waters.
   a. Electrolyte will not be dumped into drains, on the ground or in any other waters. Large scale fire testing has shown that no measurable liquid is produced in case of a fire. Furthermore, for additional precaution, a comprehensive stormwater management plan is being put into place that would contain any site runoff.

803-505 Consumer Rd
Toronto, ON M2J 4V8
Tel: 1 416 494 9559
www.powerbankcorp.com

Improper Siting in Residential Zoning

The subject lands are located with the "Rural Community" land use designation in the Armour Official Plan. The definition of the Rural Community (Policy 2.1.1) provides for a number of predominant land uses that are permitted, including (but not limited to) small scale low water use industrial operations, such as the proposed BESS. The subject lands are zoned as "Rural (Ru)", which is not strictly a residential zoning. A number of other properties in the Township of Armour are zoned as Ru and contain non-residential uses permitted through site-specific applications such as this one. In this case, the subject lands are ideal as they already possess an energy infrastructure use in the form of the existing solar array. Furthermore, the site location isn't chosen at random. Several factors have to align for a site to even be viable. One of the biggest is interconnection capacity. Remote or undeveloped areas rarely have the electrical infrastructure needed to support a grid-scale connection, and we also can't place small, distribution-connected systems in areas with low electricity demand. The IESO identifies locations based on where the grid actually needs support, and your community was flagged as an area with that need. If the project were moved too far away, the community would lose the benefit and the IESO would no longer be able to use the system for the purpose it was designed for which is to strengthen the grid in that specific area.

Lack of Pond System in Stormwater Management Plan

A stormwater retention pond is in fact been proposed. The latest stormwater management plan has been submitted to the municipality and is under peer review. Peer reviewer recommendations have been implemented to further enhance environmental protection on site.

Lack of Statistics on Fire Incidents

Between 2018 and 2023, the global failure rate for BESS systems dropped by approximately 97%, despite a massive scale-up in deployment. For context, in 2018, global battery deployment was around 2 GW, with 16 reported failure incidents. By 2023, deployment surged to 52 GW—a 2,500% increase—while the number of incidents slightly declined to 15.

EVLO's Acknowledgment of Imperfections and Lack of Developer Experience

No battery or no technology is perfect, but the risks can be effectively managed with a series of precautions that we have taken. Yes, safety precautions are of paramount importance which is why we have chosen the best of the best to work with. The battery manufacturer, EVLO, is a subsidiary of Hydro Quebec, an entity known for being risk averse and taking safety very seriously. EVLO has never had a thermal runaway event or fire occur at any of their facilities to date. The site will be NFPA 855 compliant and is 9540 and 9540A tested and compliant. We have engaged fire experts such as Fire & Risk Alliance, who were the authors of the HONI BESS safety standards and have years of experience with BESS fires. We

803-505 Consumer Rd
Toronto, ON M2J 4V8
Tel: 1 416 494 9559
www.powerbankcorp.com

have engaged installers that have extensive experience and a great track record with batteries as well. And over and above that, there are countless inspections and tests from HONI, the IESO, ESA etc.

Diminished Property Values

We know that people worry about how nearby infrastructure might affect their homes. With a small-scale, 5 MW battery facility located 300 metres away and fully screened with fencing and vegetation, the research we have seen shows little to no consistent impact on property values. These systems do not produce noise, smoke, lighting, or ongoing emissions, and at this distance most homes will not see or hear the site at all.

That said, we understand that perception matters. This is why we work closely with planners, appraisers, and the municipality to design the site in a way that is visually unobtrusive and fully compliant with national fire and safety codes. Our goal is that the facility blends into the surroundings as much as possible and does not change the character of the community.

Insurance Impacts

We have not seen evidence that homeowners living near modern, code-compliant battery sites experience higher premiums or difficulty renewing insurance. Insurers look at the safety features of the BESS, not nearby residential properties. They already insure communities with fuel stations, propane depots, heavy trucking routes, and other common hazards without penalizing residents.

Increased Taxes to Residents

The project's own taxes and contributions help cover incremental municipal costs of supporting new infrastructure. We do not expect residents to pay higher taxes because of this project. If any additional tools, training, or resources are required for the fire department, we work with the municipality to ensure the project supports them.

Property Destruction and Liability

While the possibility is exceedingly remote, if there were ever a hypothetical event where our facility caused physical damage to nearby properties, the responsibility would fall on us, not the residents. We carry robust property and liability insurance specifically designed for these facilities, and the coverage exists to protect neighbours as well as the project. We would never build anything that leaves the community financially exposed or liable for damage.

Contamination of Water, Soil and Air

The environment is of utmost importance to us. We chose an outdoor location with a ~300 m setback because distance is one of the strongest safety measures in any risk assessment.

803-505 Consumer Rd
Toronto, ON M2J 4V8
Tel: 1 416 494 9559
www.powerbankcorp.com

Modern lithium-ion battery systems follow strict standards (NFPA 855, UL9540A, local fire code). Outdoor systems disperse gases upward and into open air rather than concentrating in a room.

International studies of real-world BESS fires show:

- no long-term water or soil contamination
- emissions are short-lived and localized to the immediate area around the fire
- modern firefighting methods greatly reduce runoff and environmental impact

We also clear vegetation around the facility and maintain buffer zones to minimize wildfire risk and protect local wildlife. We are not risking your water or soil. We are designing the facility specifically to protect both.

Explosion Risk

- The scenarios people imagine often come from older incidents with outdated equipment and no gas-detection systems. Since then, the entire industry has changed:
- containers now have built-in ventilation
- continuous gas detection
- fire-resistant construction
- improved emergency procedures
- setback rules that did not exist 5–10 years ago
- Those lessons are the reason a small outdoor facility 300 m from homes is considered very low risk. Modern designs are built with layers of engineering controls to ensure that a rare battery failure does not escalate beyond the container.

New Technology

Battery storage is not new or experimental technology. It is used across Ontario, Canada, the US, Europe, and Australia at far larger scales than what is proposed here. The standards we are following come from thousands of megawatts of operating systems worldwide.

Your community is not a testing ground. This is a proven, regulated technology being built to modern safety codes.

Responsibility for Application Review and Processing Costs
All costs associated with reviewing and processing these applications are being covered by PowerBank.

Comparisons to Other Municipalities That Rejected Projects and Expectations for Armour to Follow Suit
It’s important to understand that battery projects are not all the same. Every BESS proposal is reviewed based on site-specific conditions, not simply because it is a BESS.

803-505 Consumer Rd
Toronto, ON M2J 4V8
Tel: 1 416 494 9559
www.powerbankcorp.com

Many of the projects that were rejected in other municipalities had legitimate issues specific to those locations such as unsuitable topography, environmental concerns (being in a flood plain for Arran-Elderslie proposal). In fact, we withdrew our own Gravenhurst proposal for those exact reasons. The field visits showed it wasn't an appropriate site, so we stepped back before we took it to Council and asked for their support and prior to even submitting an application with the IESO.

In contrast, the site we are discussing here has undergone extensive due diligence, including environmental, technical, and safety studies conducted by independent experts. Those studies did not identify the kinds of constraints or risks that have caused other municipalities to reject projects.

Concerns About Reckless Decisions and Potential Safety Impact

Nothing about this process has been reckless. The development of this site has involved input from hundreds of professionals across multiple disciplines — engineers, environmental specialists, fire and safety experts, planners, and utility reviewers. Every aspect of the project has been examined through multiple layers of technical review, risk assessment, and regulatory compliance. Safety has been the driving priority throughout, and no element has been overlooked or taken lightly.

Concerns That the BESS Site Could Expand Beyond the Proposed 9 Units

The project cannot expand beyond the 9 approved containers because the IESO contract fixes the system size and configuration. Any increase is not permitted under the contract. Further, the Zoning and Site Plan approvals will have regulations which confirm the development matches what has been proposed in the submission materials, as opposed to a larger or different form of development.

Decommissioning Plan Cost Discrepancies

The Municipality has posted all versions of submission materials to the Township website, including earlier drafts/iterations of certain materials which have since been updated pursuant to discussions with the Township and their expert peer reviewers. The original decommissioning plan has been fully updated to incorporate all peer reviewer recommendations. It has now been finalized, approved by the peer reviewer, and the final version is posted on the Township of Armour's website.

Lack of Benefits to Local Communities

The proposed Battery Energy Storage System (BESS) will deliver numerous benefits to both the local community and the broader electricity system - financial, environmental, and social. First and foremost, the facility will enhance grid stability and reliability, helping to protect residents and businesses from future brownouts or blackouts. By storing excess electricity during low-demand periods and releasing it back to the grid when demand peaks, the project helps to smooth out fluctuations in supply and demand. This contributes to lower and more stable electricity prices across the province by reducing costly demand

803-505 Consumer Rd
Toronto, ON M2J 4V8
Tel: 1 416 494 9559
www.powerbankcorp.com

spikes and decreasing reliance on gas-fi red peaking plants which are both more expensive and more polluting.

In addition, a Community Benefit Agreement (CBA) is intended to be established with the municipality. Funds from this agreement can be directed toward local priorities such as supporting emergency services, enhancing public infrastructure, improving recreational facilities, or funding other community-led initiatives. The project will also generate local economic and employment benefits. During the development and construction phase (expected to span approximately 1 year), a range of skilled trades and services—such as electricians, equipment operators, and general contractors—will be required, creating significant local employment opportunities. Once operational, the facility will continue to support long-term local jobs in areas such as operations and maintenance, vegetation management, and snow removal.

Comments Regarding the Methodology of the Environmental Impact Study Prepared by SLR
Please refer to Appendix A below for a response from SLR.

Please Refer to Appendix B for Response from Fire and Risk Alliance Pertaining to Additional Specific Technical Questions

Conclusion

In conclusion, Powerbank Corporation and its consulting team have carefully considered the comments raised at the November 18, 2025 public meeting, as well as feedback received throughout the review process to date. The responses provided in this letter are intended to clarify outstanding questions and demonstrate how community input, technical peer review, and agency comments have informed the proposed development and recommended conditions of approval.

Powerbank remains committed to ongoing engagement with the Township of Armour, reviewing agencies, and the local community as the applications advance through the approval process. It is our view that the proposed BESS facility can be appropriately accommodated on the subject lands in a manner that is consistent with applicable provincial policy, the Township's planning framework, and the public interest. It is also our view that the concerns raised by the public regarding the applications have been considered by the various technical materials submitted to the municipality.

Enclosures:

- Appendix A: SLR Response to Comments Memo, dated December 16, 2025.
- Appendix B: FRA Response to Comments Correspondence, dated December 20, 2025.

APPENDIX A

Technical Memorandum

To:	Ina Lila	**From:**	Carlene Perkin & Dirk Janas
Company:	PowerBank Corporation		**SLR Consulting (Canada) Ltd.**
cc:		**Date:**	December 16, 2025
		Project No.	209.065266.00002
		Revision	0

RE: Armour Township Official Plan Amendment & Zoning By-law Amendment
Public Meeting - November 18, 2025, Response to Comments
219 Peggs Mountain Road, Armour

The Township of Armour Council held an Official Plan Amendment (OPA) Application OPA-2025-01 (Amendment No. 4) and Zoning By-law Amendment (ZBA) Application ZBA-2025-01 public meeting on November 18, 2025, for 219 Peggs Mountain Road, Armour, Ontario. This technical memorandum has been prepared to address public comments raised during the Council Meeting concerning the Environmental Impact Study (EIS) prepared by SLR Consulting (Canada) Ltd. (SLR) (SLR, 2025).

1.0 Community Concerns

Concerns raised by community member Grace McCoy during the OPA Application and ZBA Application Council Meeting were recorded by the Council, which was shared with SLR on December 3, 2025. The recording of their comments that run from 1:13:46 to 1:18:21 was reviewed, and responses are provided below.

1.1 Supporting Documents for Application

There are currently only three documents that are still being finalized – the stormwater management report, the Emergency Response Plan (ERP), and the firefighter training plan. Everything else has already been completed.

1.2 Minor Revisions to the Environmental Impact Study

SLR appreciates the input to the EIS and acknowledges that there were some minor errors and omissions to the EIS. The following sections describe these items and corrective actions taken by SLR. The EIS has been updated to include these changes. The conclusions and recommendations of the EIS remain unchanged.

1.2.1 Study Area Location

The project is located in Township of Armour, not Burk's Falls. The document currently states that the project is located in the "*Township of Armour, Township of Parry Sound*." Armour is correct, but "*Township of Parry Sound*" is a typo. It should read "*District of Parry Sound*." This correction has been made in the revised EIS.

1.2.2 Significant Wildlife Habitat Ecoregion

On page 13, the reference to Ecoregion 6E is simply a typo. All of the actual fieldwork and analysis was completed using Ecoregion 5E, as correctly noted on pages 3, 12, 24, and in

Appendix D (Significant Wildlife Habitat Screening). The mention of 6E is a typo and does not reflect the methodology used or the conclusions regarding the Significant Wildlife Habitat analysis.

This is confirmed by looking at the wildlife screening references and the detailed results in Appendix D, which all correspond to Ecoregion 5E. The EIS and its findings were also peer reviewed by the Township's experts, who confirmed that the work was completed properly, and the conclusions are sound.

The typo has been corrected in the revised EIS.

1.3 Survey Methodology

The most recent 2022 protocol was used as stated on page 13 (Ministry of Environment Conservation and Parks, 2022). From SLR's experience and consultation with the MECP for a wide range of projects, the direction has been provided to reference this protocol.

Page 11 of the EIS outlines the fieldwork completed on three separate dates: May 2, June 3, and June 13, 2025. Over the years the Ministry of the Environment, Conservation and Parks (MECP) has had a range of and made changes to the methodologies for deployment of the acoustic monitors. There is always some site-level interpretation on what is appropriate for how many monitors to install, and it was SLR's professional opinion based on professional experience that one acoustic monitor was appropriate for the small scale of proposed disturbance. SLR took the approach that has been used on all their projects that have been reviewed by the MECP and have not had issues.

The EIS was prepared by SLR and then independently reviewed and accepted by the Township's own peer review experts.

The detection of acoustic bat activity on its own does not mean the site contains roosting habitat or qualifies as "Significant Wildlife Habitat." Some level of seasonal bat movement is normal and expected across Ontario. What matters under the legislation is whether there is evidence of maternity roosting habitat, because that is the specific trigger for restrictions under the Provincial Planning Statement (Ontario Ministry of Municipal Affairs and Housing, 2024). In this case, the study found no evidence of maternity roosts, and therefore the site does not meet the criteria for protected bat habitat. Adult female Hoary Bats (*Lasiurus cinereus*) and Silver-haired Bats (*Lasionycterus noctivagans*) often return to the same maternity roosts or colonies year after year (COSEWIC, 2023). Beyond this, little is known about dispersal in these species. Recapture records are scarce due to the lack of systematic banding programs in North America (COSEWIC, 2023). To avoid impacts to these species and to comply with the Endangered Species Act, it is recommended that vegetation clearing not occur during the bat maternity roosting season for these species (generally occurs annually between April 1 to October 31).

During monitoring, two SAR bat species were confirmed with high confidence, but their actual use of the area was very low. The number of acoustic files was minimal: six for Hoary Bat, 12 for Silver-haired Bat, and one for a potential Myotis species (*Myotis* sp.). Sites with high bat use typically record hundreds of files per species. This low activity suggests that the Study Area receives very limited bat usage and potentially records of bats flying by through the area rather than roosting.

The site also contains only two snag trees within the 0.84 ha Study Area, which is well below the preferred density of 10 snags per hectare for SAR bats, based on Ministry of Natural Resources guidance. This further supports the conclusion that the habitat is not suitable for maternity roosting.

Provincial mitigation requirements will be adhered to, including timing windows for any vegetation removal to ensure that construction should take place outside of sensitive timing windows for wildlife species. One artificial bat habitat structure (e.g., a Rocket Box) will be installed along the edge of the treed area to provide habitat enhancement opportunities.

2.0 Statement of Limitations

This report has been prepared by SLR Consulting (Canada) Ltd. (SLR) for PowerBank Corporation (Client) in accordance with the scope of work and all other terms and conditions of the agreement between such parties. SLR acknowledges and agrees that the Client may provide this report to government agencies, interest holders, and/or Indigenous communities as part of project planning or regulatory approval processes. Copying or distribution of this report, in whole or in part, for any other purpose other than as aforementioned is not permitted without the prior written consent of SLR.

Any findings, conclusions, recommendations, or designs provided in this report are based on conditions and criteria that existed at the time work was completed and the assumptions and qualifications set forth herein.

This report may contain data or information provided by third party sources on which SLR is entitled to rely without verification and SLR does not warranty the accuracy of any such data or information.

Nothing in this report constitutes a legal opinion nor does SLR make any representation as to compliance with any laws, rules, regulations, or policies established by federal, provincial territorial, or local government bodies, other than as specifically set forth in this report. Revisions to legislative or regulatory standards referred to in this report may be expected over time and, as a result, modifications to the findings, conclusions, or recommendations may be necessary.

3.0 Closure

Regards,

SLR Consulting (Canada) Ltd.

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

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

4.0 References

COSEWIC. (2023). *COSEWIC assessment and status report on the Hoary Bat Lasiurus cinereus, Eastern Red Bat Lasiurus borealis and Silver-haired Bat, Lasionycteris noctivagans, in Canada.* Retrieved from Government of Canada: https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/cosewic-assessments-status-reports/hoary-bat-eastern-red-bat-silver-haired-bat-2023.html

Ministry of Environment Conservation and Parks. (2022). *Maternity Roost Surveys (Forests/Woodlands).*

Ontario Ministry of Municipal Affairs and Housing. (2024). *Provincial Planning Statement, 2024.* doi:ISBN 978-1-4606-3522-3

SLR. (2025). *Environmental Impact Study (EIS) 219 Peggs Mountain Road, Armour.*

APPENDIX B

Connor Wright - Zelinka Priamo Ltd.

From: Ina Lila <ina.lila@powerbankcorp.com>
Sent: Monday, January 5, 2026 9:17 AM
To: Ina Lila
Subject: FW: Public Questions

From: Anthony Natale <anatale@fireriskalliance.com>
Sent: December 20, 2025 9:42 AM
To: Ina Lila <ina.lila@solarbankcorp.com>
Cc: Matt Quinn <mquinn@fireriskalliance.com>; Jessica Gallo <jgallo@fireriskalliance.com>
Subject: Public Questions

Hi Ina: Ù
Please find our response to your questions below. Ù

- **Lithium phosphate batteries, LFP batteries, release toxic smoke, which is hydrogen fluoride gas, into the atmosphere, making evacuations a real possibility.**
    - Energy storage systems are required by code to undergo large scale fire testing that was designed by UL. One of the test requirements is to determine what constituents are found in the products of combustion.
    - Carbon Monoxide, Carbon Dioxide, Methane (natural gas) and Hydrogen account for 90% of the products of combustion. During fire testing Hydrogen Fluoride (HF) can be produced in small quantities within the burning cabinet but has not been detected beyond the battery cabinet. HF can be produced from the battery electrolyte and from freon in the air conditioning system. HF is also found in residential fires from the following sources: Insulation, electrical cables, freon, & cleaning products.
    - The Moss Landing fire provides insight into the worst-case scenario of a battery fire. This facility is 243 meters by 30 meters in size. The EPA in the United States conducted air monitoring during the incident and determined that there were no exceedances of human health standards for HF gas. In conclusion, a fire at a massive facility which is 243m x 30m did not produce any health risk from HF. We would be hard pressed to imagine that battery cabinets at our facility which are 24m x 3m would produce HF that would impact the surrounding community.

EPA Completes Air Monitoring Near Moss Landing Vistra Battery Fire

Emergency Response -- Monitoring by the state and Vistra will continue to watch for any risks to public health

January 20, 2025

Contact Information
Mikayla Rumph (rumph.mikayla@epa.gov)
(213) 317-5259

MONTEREY— On January 20, the U.S. Environmental Protection Agency (EPA) concluded supplemental air monitoring in the vicinity of the Vistra Energy battery power storage facility fire in Moss Landing, CA. Results for hydrogen fluoride and particulate matter showed no risk to public health throughout the incident, and smoke from the facility has greatly diminished. The EPA demobilized air monitoring operations after consultation with the Monterey County Incident Command for the Vistra fire.

EPA began monitoring for hydrogen fluoride, a highly toxic gas produced by lithium-ion battery fires, and for particulate matter after the fire began on January 16. The request for air monitoring came from Monterey County. As part of the multi-agency emergency response, EPA installed a total of nine monitoring stations shortly after the fire started. Two monitoring stations were located at the facility and four just outside the facility, including one at Moss Landing. Three monitoring stations were located in communities due east of the fire, to the south near Castroville, and to the north in the vicinity of Moss Landing Middle School. Monitoring stations were sited to account for changes in wind direction and potential drift to nearby communities.

EPA's monitoring showed concentrations of particulate matter to be consistent with the air quality index throughout the Monterey Bay and San Francisco Bay regions, with no measurements exceeding the moderate air quality level. Hydrogen fluoride gas was measured at one second intervals and there were no exceedances of California's human health standards.

- **There's a high risk of toxic, flammable electrolyte leakage into soil.**
    - During a BESS incident, the electrolyte burns, vaporizes or decomposes in the fire. It is largely consumed in thermal events rather than pooling as a liquid. The battery cabinets are on an impermeable pad and there is curbing/grading in place, so liquids are contained and not just flowing off into surrounding soil. Site drainage is then controlled to the pond on site for further protection. Furthermore, testing of the EVLO batteries has shown that no measurable liquid is produced even during large scale fire testing.
- **These fires can easily spread from one battery to another.**
    - These fires cannot easily spread from one container to the other. NFPA855 requires manufacturers to prove that a fire in one unit will not propagate to another by using the UL 9540A testing method. These units are UL9540A and NFPA855 compliant and have undergone rigorous full-scale thermal-runway testing to be able to demonstrate no propagation.
- **There is no approved method of extinguishing these fires. Water will not put them out. They are left to burn themselves out, often taking hours or even days. Water is only used to cool off the adjacent structures.**
    - Lithium-ion battery fires behave differently than traditional structure fires, but it is not accurate to say there is no approved method to manage them. Modern standards and full-scale testing have established a well-defined firefighting approach that is both safe and effective for today's utility-scale BESS units.

- The primary goal of suppression within the fire services is to protect life and preservation of property. The facility is not staffed so there are no life safety risks as opposed to residential fires. In this matter whatever is burning at the battery facility cannot be saved so suppression is no longer the focus. When the fire services arrive at a fully involved residential fire they cannot save the structure, so they focus on protecting the adjacent properties. A similar strategy is employed during battery fires. Battery cabinets are designed to contain a fire within, the recommendation to the fire services is simply to monitor conditions with intervention limited to asset protection.

- **And there is no way to guarantee water spray won't come into contact with the hydrogen fluoride gas now becoming hydrofluoric acid which is highly corrosive and toxic, and this contaminated fire runoff water will be spilling into the Magnetawan watershed.**
  - On September 5th, 2024, a fire occurred at a battery facility in Escondido, California. This was an older facility installed before the fire code was established. It utilizes 53-foot battery cabinets with Nickel Manganese Cobalt (NMC) cells.
  - The fire department did not engage in suppression as we recommend; they focused on asset protection and applied water as a curtain between the failed battery cabinet and the adjacent one. So, the concern that is being brought to question has actually happened and has been analyzed.

Above readings are the peak (highest detected) readings during the entire incident*

*** CO2 sensors are calibrated to account for typical atmospheric CO2 levels, which generally range between 400-420ppm. This ensures that variations above normal levels are easily detectable***

Negative reading on Fluoride paper at all locations. Non detect for Hydrofluoric Acid (HF) at all sites

*** All readings taken were well below acceptable exposure limits and considered expected readings during a routine structure fire***

  - Page 5 of the report outlined above indicates that there was no HF detected in air monitoring at multiple locations around the site so there could be no acid-based runoff generated by the application of water. Note: Air sampling was conducted by San Diego County HazMat and a link to the full report can be found below.
  - SDGE Battery Fire Air Quality Report.pdf

- **These are our environmental risks. The site is a high-risk area for forest fires.**
  - Class A fires such as wood, paper and trash produce embers which promote fire spread leading to wildfires. There are no Class A materials associated with the construction of battery cabinets therefore they do not pose a risk to the surrounding forestry from embers during a fire.

- A hazard mitigation analysis of the proposed site was performed to ensure the design complied with code compliance and any risk identified was mitigated appropriately. Code requires a 3-meter buffer zone between battery cabinets and vegetation in the event of a battery fire to prevent fire propagation from radiant heat. Conservatively we increased this distance to 30 meters which far exceeds code requirements.

--

Anthony Natale | Fire & Risk Alliance, LLC | Director of Risk & Response

7620 Standish Place | Rockville, MD 20855 | M: 347 573-0531
NFPA 1, 18, 385 & 855 Technical Committee Member

ProBoard Level II Fire Instructor

Fire & Risk Alliance