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Vegetation Plan

903 BESS

219 Pegg's Mountain Road, Burk's Falls, ON

Overview

The objective of vegetation management is to establish a vegetation management schedule for battery systems, utility collection lines, and access roads (as necessary) for the Project to preserve the reliability of the Project components as well as minimize fire risks. Regular vegetation management helps to prevent outages associated with vegetation located on or near Project components, to minimize outages caused by insufficient clearances from nearby vegetation, and to implement inspection schedules, treatment schedules, and reduce fire risks from within and from outside the Project.

To reduce fire risk, a 30 m vegetative setback is maintained around the BESS, serving as an extended defensible space consistent with Priority Zone 1 in the MNRFP guidance. This buffer is further reinforced by a 6 m gravel access road, expanding the total clearance to approximately 36 m and supporting both fire containment and emergency access. Vegetation maintenance addresses the following objectives:

- Maintaining Distribution Reliability – the reliability of electrical service through vegetation control regardless of accessibility or workability.
- Minimizing Fire Risk - 30 m vegetative setback is maintained around the BESS, serving as an extended defensible space consistent with Priority Zone 1 in the Ministry of Natural Resources and Forestry (MNRFP) guidance
- Compliance – ensuring that the Applicant is compliant with applicable regulations by utilizing industry standards to maintain the systems environmental surroundings.
- Mechanical means such as mowing and weed whacking will be employed to control vegetation in the first instance.
- Access road and areas within the fence limits will be filled with crushed stone, a natural barrier to vegetation growth and minimizes the need for vegetation control methods in the vicinity of electrical components.
- Improving/Maintaining Accessibility – promoting accessibility to Project components by controlling vegetation on and around component locations and access roads where practical. Hydro One will maintain rights-of-way (ROW) under the 44-kilovolt (kV) line tying the Point of Interconnection (POI) to the existing distribution line.

Practices & Prescription

The vegetation management strategy centers on maintaining a low-growth, grass-only buffer around the BESS facility. Management practices—such as mowing, trimming, or vegetation removal—will be selected based on site-specific conditions, environmental sensitivity, and overall effectiveness.

While the Ministry of Natural Resources and Forestry (MNRFP) Wildland Fire Manual is primarily intended for residential and other sensitive developments, its core fire mitigation principles have been adapted to guide our approach. Specifically, we have applied Priority Zone 1 standards—normally applicable to the first 10 m—across the full 30 m setback surrounding the BESS. This means that both Zone 1 (0–10 m) and Zone 2 (10–30 m) are managed to the more rigorous Zone 1 standard, with the entire area maintained free of combustible vegetation and limited to low, regularly mowed grass.

Beyond the vegetative buffer, a 6 m-wide gravel access road encircles the facility and is kept clear of vegetation. This extends the total defensible space to 36 m, exceeding the combined Zone 1 and 2 recommendations in the MNR guidance. This enhanced buffer not only reduces fire risk but also ensures reliable access for emergency responders.

Given that BESS facilities do not typically emit embers in the rare case of fire, the implementation of Priority Zone 3 measures is not considered necessary. The current fire mitigation strategy is considered robust and appropriate to manage the associated risks effectively.

Mowing (Primary Method): During the operation and maintenance period of the Project, vegetation will be mowed at least four times a year from the exterior fence line to the wraparound access road. This will not only facilitate safe access to the site, but also reduce fire risk from within and from outside of the site. Due to the proposed crushed stone base inside the fence, surrounding electrical equipment, and access road, minimal vegetation control would be required in these areas.

Inspections

Site inspections will primarily focus on the project area, with occasional checks in adjacent areas as needed. These inspections will evaluate vegetation conditions to maintain the 30 m vegetative setback.

Vegetation maintenance will include regular mowing and trimming to grass areas outside the fence and up to the access road. Vegetation within the 30m zone will typically be kept under 4-6 inches (10–15 cm) to maintain access and mitigate fire risk and mowing frequency will be increased during high fire-risk periods. On average, four mows per year will be completed, adjusted for seasonal conditions. Mowing will be avoided during wet conditions or immediately after rainfall.

The following elements will be implemented during scheduled inspections post construction in order to maintain unimpeded operation of the facility and reduce fire risk.

Regular planned routine inspections will evaluate and identify:

- Excessive growth of ground cover grass or weeds;
- Bare spots and/or excessive weed growth;

Periodic mowing and trimming to grass areas:

- Maintain vegetation height based on actual observed growth (typically maintained to 4-6 inches) to mitigate ground level fire risk
- Approximately 4 annual mows depending on conditions;
- Avoid mowing while ground is wet or with 24-48 hours after heavy rain;
- Mow project area outside of the fenced equipment as needed to maintain 30m clearance up to the access road.
- Trim around utility poles;