

February 18, 2025

To the Stakeholders of the Marchurst Road Battery Energy Storage System (BESS) Proposal,

This letter is intended for your consideration on behalf of the residents of West Carleton-March, Ward 5, City of Ottawa.

### **EXECUTIVE SUMMARY**

Ontario's Independent Electricity Systems Operator (IESO) wants to increase the province's energy storage capacity. Under contract to them, Evolugen proposed a 250 MW Battery Energy Storage System (BESS) for Marchurst Road in Ward 5 of the City of Ottawa.

This document is the formal response on behalf of the residents opposing this scale of BESS in our Ward. The risks to our arable and protected lands, and the impact this is having on our close-knit community are not worth the costs.

Many of us in Ward 5 already use alternative energy, and based on our experience with it, propose several solutions and alternative sites. This location is being chosen under pressure - not because it benefits the residents. Yes, the provincial grid needs energy storage but there are many, better options for this industrial-scale project.

### **Background**

The Ontario government directed the Independent Electricity Systems Operators to increase energy production and storage in stages over the next several years. Evolugen by Brookfield Renewables was awarded an energy storage contract through the IESO's First Long Term Request for Proposals (LT1 RFP). Evolugen has proposed their contracted 250MW Battery Energy Storage System (BESS) for Marchurst Road in West Carleton-March, Ward 5 of the City of Ottawa.

Although a formal proposal for this project has not yet been received through the proper channel (the City of Ottawa Ward 5 Councillor Clarke Kelly's office), Evolugen has proposed this project through a multitude of other channels.

A letter from one of two land-owners who has agreed to options to lease their land with Evolugen, informed neighbours of the project proposal through a letter distributed on January 20, 2025. Evolugen disclosed their proposal for this project to four Ward residents at a private meeting on January 22, 2025. Evolugen has announced the proposal on their website

getchargedottawa.ca. The proposal on this webpage includes a satellite image of the exact location for the intended connection between the BESS and the 230kV circuit. On January 30, 2025, The Toronto Star published a sponsored article detailing the South March BESS. One can access this article via a social media advertisement courtesy of GetCharged Ottawa, with links to several Ontario media outlets.

Evolugen has clearly announced their BESS proposal for Marchurst Road.

This document is a formal statement of opposition on behalf of the residents of West Carleton-March, in response to Evolgen's Marchurst Road BESS proposal.

The community of West Carleton-March, Ward 5, does NOT support Evolgen by Brookfield Renewable's BESS proposal for Marchurst Road.

The meeting of the City of Ottawa's Agriculture and Rural Affairs Committee (ARAC) on Thursday, January 23, 2025, made it clear that the proposal for an industrial scale BESS at the Marchurst Rd. location is unnecessary. This particular ARAC meeting was not intended to discuss the Marchurst Rd. BESS, only the discussion of proposed bylaw changes pertaining to BESS. However, as will be presented clearly in this document, the information and opinions shared during this meeting are highly relevant to the Marchurst Rd. proposal. Furthermore, other key factors that must be considered, regarding the placement of an industrial-scale BESS, have not been considered by Evolgen.

## **PART ONE: Summary of Incongruence of BESS Project in Rural Ward 5- The 250MW BESS Will be Welcome in Other Wards**

According to Eric Muller, the Ontario Director of the Canadian Renewable Energy Association (CanREA) who spoke at the ARAC meeting on January 23, "Some municipalities in Ontario and in other jurisdictions in Canada put their hand up and say [they] are actively seeking projects: wind, solar, and battery storage, and [they] are willing hosts..."

Evolugen's Trail Road BESS approval for Ward 21 is evidence that there are communities willing to host BESS projects in Ottawa, when appropriate site conditions are met, and when the suitability of the project in relationship to its environs is considered.

Several delegates at the ARAC meeting (notably none declaring Ward 5 as their residence, 1 self-identifying as a friend of Ward 5) voiced their support of the BESS project on Marchurst Rd. As previously noted, this particular BESS project was not an agenda item at this ARAC meeting, yet these proponents felt so strongly as to assert their support of the Marchurst Rd. proposal as delegates at this meeting.

At the January 22 meeting of Evolgen and four West Carleton-March residents, Ms. Jennifer Stewart, the Founder and CEO of Syntax Strategic ("a team of creative storytellers, expert

communicators and inspired marketers”), who is collaborating with Evolgen, said she herself tried to volunteer her own parcel of land in the neighbouring municipality of Mississippi Mills for this BESS project.

One can reasonably speculate based on the representation of delegates from these other Wards, and Ms. Stewart’s offer, that this scale of BESS proposal would be welcomed in other city Wards and neighbouring municipalities.

There were no delegates of Ward 5 at this meeting who voiced support for the Marchurst Rd. BESS.

Given that other Wards are likely to support this industrial-scale BESS (as Ward 21 has already proven), and that Ward 5 residents have already decisively rejected this project on one occasion in 2024 (Fitzroy Harbour: <https://alliancetoprotectwestcarleton.ca>), it is shocking that a second attempt at siting this BESS in West Carleton-March is being forced on the residents of Ward 5.

### **Ward 5 is Rural, with Rural Values**

Ward 5 accounts for only 2.2 percent of the population of the City of Ottawa, and 1.8 percent of Ottawa’s households. It is a rural ward.

Rural, by its very definition, is “characteristic of the countryside”, and “an area of low population density.” Rural therefore, is where farmland exists. Farmland is required to grow the food that feeds cities. We cannot sacrifice food production for the sake of urban sprawl and industrialization.

Our arable land is limited; a tiny dissolving fraction of our country.

While it may not seem obvious to everyone, rural values differ greatly from those of urban areas.

The delegates from Ward 5 at the ARAC meeting expressed our rural values well. We are farmers, many of our families having farmed for generations in West Carleton-March. We are stewards of this land. We are the protectors of nature and our environment. We value the slow, the quiet of nature, the wild, the dark sky, and the clean air. As stated by Ms. Courtney Argue at ARAC, we are a close-knit community that relies on and trusts one another for support. We find resilience and self-sufficiency in our collective strength.

We are a Ward trying to preserve these values, amidst the increasing urbanization and development of our rural agricultural and wild lands.

Why should 2.2 percent of the City of Ottawa’s population sacrifice our values, in order to allow for the massive residential and industrial growth that is welcomed, valued, and, by definition of “urban”, expected in other city Wards?

## **Rapid Unsustainable Growth and Industrialization is the Antithesis of Our Ward Values**

Several speakers at the ARAC meeting, including Mr. Marko Cirovic of the Independent Electricity System Operator (IESO) and Mr. Andrew Thiele from Energy Storage Canada explained that battery energy storage systems are needed to address the rapidly increasing industrial and residential demands for energy in Ottawa and Ontario.

If Ward 5 is to remain a rural community, this is not the scale or speed of growth that we want.

As evidenced by the continued fall of our national gross domestic product per capita as our population increases, the idealization of rapid growth should be questioned.

## **The Timeline, and not the Wellbeing of Our Community, is Evolugen's priority.**

Mr. Alex Simakov of Evolugen (formerly the Director of External Affairs for the non-partisan, non-profit Energy Storage Canada) asserted at the ARAC meeting that “focusing on the two BESS projects that we’re [Evolugen] looking to develop in Ottawa [Trail Road and Marchurst Road], our priority is on timing. We have some strict timelines here, including adhering to a commercial operation date of May 1, 2028, and earning an MSR [Municipal Support Resolution] by the end of this year.

During the ARAC meeting, Councillor David Brown of Ward 21 noted that “there were concerns brought up about an uneven playing field between public utilities and some private applicants who may come forward [ie. Evolugen]. I would say that’s likely because a public utility is there to serve a public good, and we as elected officials have somewhat more control over a public utility. But the first rule of business is to make money. There’s money to be made here, which is why we have folks who want to get into the market.”

Evolugen is in a rush. The IESO BESS contracts, and the tax credits and benefits provided to the companies awarded these bids are time-sensitive. And so are the associated profits.

One could speculate that Evolugen specifically chose our less populous Ward with the hopes that their proposal would meet relatively little opposition, and that any opposition they did meet would be overwhelmingly countered by the desires and values of the City of Ottawa's urban population and industry.

## **Evolugen’s Lack of Disclosure has Led to Widespread Distrust**

At the ARAC meeting Councillor David Brown spoke to an issue that is of great concern with regards to Evolugen’s conduct thus far in Ward 5: respect.

He summarized that “At the end of the day our job [Councillors] is to sit here and represent the concerns of our residents and not to help business grow. I’m not opposed to business, I’m not

opposed to private industry. We want to make sure though, that the taxpayers and residents are respected.”

During a meeting with Evolugen representatives on January 22, 2025, it was disclosed that Evolugen secured *options* to lease land with two West Carleton-March land-owners, before communicating their intentions to Ward 5 Councillor Kelly and the community.

News that a BESS was being proposed for Marchurst Rd. came to light only after surveyors contracted by Evolugen were discovered unannounced, having climbed over solid fences onto neighbouring properties. The police were called and a report was made. The inquiries of these affected land-owners led to the subsequent disclosure of the BESS proposal.

On January 22, 2025, Evolugen representatives shared that the company began investigating the use of the two Marchurst properties as early as the summer of 2024.

Evolugen had no less than six months to relay to Councillor Kelly their intentions to relocate the BESS project to Marchurst Rd. And yet in spite of their rush to expedite the project, news of the project reached Councillor Kelly’s office as a result of the incident involving the police.

These actions display disrespect for our elected representative, Councillor Clarke Kelly, and the residents of West Carleton-March.

Ward 5 residents appreciate the apologies received from Evolugen on January 22nd regarding these events; however, we would be ignorant to entrust the responsibility of the land that we steward, to a for-profit company that has not once, but twice deceived (out of either neglect or intention) Ward 5 residents.

### **Poor Site Selection**

The site selection for this project would place it in the middle of land zoned for Rural Use (RU) and currently producing crops that sustain our food supply. This specific location is at the top of the Carp Ridge, surrounded by wetlands and streams that feed into the Carp River, Constance Bay Lake, and the Ottawa River after first traversing water sources that Ward 5 residents depend on. Our water supply comes from drilled and dug well systems.

In their statement of opposition to this project made on January 30, 2025, the board of Friends of the Carp Hills asked a pertinent question directly related to the site selection for this BESS: “Why would anyone place any industrial facility next to a Provincially Significant Wetland Complex and candidate Provincially Significant ANSI [Area of Natural and Scientific Interest], that is home to nine Species at Risk?”

Only Evolugen can answer this.

Further regarding poor site selection, our local fire department is volunteer based. Given this, and the lack of local water sources and fire hydrants, the likelihood that a fire could be fought successfully at this site on Marchurst Road is miniscule. The majority of BESS fires are left to burn out on their own, as noted by Fire Chief Paul Hutt, of Ottawa Fire Services at the ARAC meeting. While Evolgen states that the risk of a fire incident is extremely low, the outcome of such an incident at this site would be catastrophic, given the nature of the battery materials, its position in our Ward and the nature of our Ward, as previously outlined. There is currently no plan to address the consequences of a hazardous incident such as a fire and the remediation needed to the site and surrounding properties. There is currently no plan in place to measure the quality of external, off-gassed air at the site.

Further to the site issues already noted, Marchurst Rd. suffered flooding and sinkholes including some almost directly in front of the proposed properties in August, 2024. The likelihood that this road can withstand the force of 248 shipping containers, weighing in at 46 Tons each is extremely low.

Councillor David Brown of Ward 21 was precise with his recommendations regarding the large-scale BESS being targeted to rural areas in the City of Ottawa. "We did issue an MSR through Council for the project in my Ward because it was sited in a location that doesn't have folks living right next door. It's south of the Trail Road Waste Facility where we will never approve development. It's just west of the 416 highway. It was sited in a location that makes sense. It's sited in a location that makes a lot of sense if we're going to be doing this going forward, and I would encourage applicants or potential applicants to look at areas like that in the City where you're going to have a willing host..."

## **Project Scale**

The residents of Ward 5 are not in opposition to clean energy, or energy storage. Our very livelihood has depended on our own ingenuity and resilience for generations. Renewable energy sources including small-scale solar and wind, as well as residential battery storage facilities and microfit installations are already playing a role in our resilience amidst frequent power grid outages, and they will increasingly do so in future.

It is the scale of this project that does not align. With increasing scale the risk of catastrophic failure increases (Safety of Grid-Scale Lithium-Ion Battery Energy Storage Systems, University of Oxford, 2021, link included at the end of this communication).

The scale of this proposal is industrial, similar in nature to the \$800 million, 250MW Northland Power Oneida BESS scheduled to commence commercial operation in Jarvis, Ontario this summer.

## **Summary**

The proposal of a 250 MW industrial-scale BESS, built for the purpose of supporting industrial and residential growth, in the middle of West Carleton-March RU-zoned farmland, surrounded by wetlands, wildlife, and the Carp Ridge, is the antithesis of our values. This is an adequate reason on its own, without even considering that for proponents of the project, time is the priority, not the affected community.

## **PART TWO: Solutions and Considerations**

As stated previously, Ward 5 residents are not opposed to clean energy nor are we opposed to BESS. In fact, we are in favour; a preliminary and growing list of residential-scale green energy projects in Ward 5 is available on request.

But the details matter.

We propose that:

**If industrial-scale BESS are to exist, they should be situated in communities (Wards) that are volunteering to host them**

AND

**Wards with surging energy demands due to industrial or residential growth should be the site of any industrial-scale BESS projects**

These Wards may very well be one and the same.

For instance, Ward 21 welcomed the Trail Rd. BESS. Ward 21 and Ward 6 share a boundary that is in direct proximity to high-voltage power lines. This boundary is also the site of massive loss of farmland and increasing residential development. It is likely that land could be leased at these locations allowing for a BESS project that pre-exists other development. Homes in the area sell, regardless of many neighbourhoods being near directly situated beneath high-voltage power lines (Trail-Side). It is unlikely that BESS here would be a deterrent for the burgeoning population.

The Kanata North Technology Park in Ward 4 is no doubt a major factor in this BESS proposal. Councillor Curry engaged Evolugen during the ARAC meeting, receiving assurances that Evolugen was communicating with both tech companies (eg. Nokia) and with City of Ottawa staff, in order to facilitate economic growth opportunities in this area.

Regarding his communications with the high-tech companies in the Kanata Tech Park, Mr. Alex Simakov of Evolugen stated at the ARAC meeting that “they expressed a tremendous appetite

for every kilowatt that we can [provide] off of the system.” Data storage and technology is massively energy-demanding. Much of the focus during the ARAC meeting was on avoiding undue red-tape that would slow the process of providing energy storage for new and expanding industry in Ottawa, particularly in Kanata North.

Industry is the largest consumer of energy in the City of Ottawa, accounting for 36% of usage (Hydro Ottawa). Residential usage accounts for 19%.

The Kanata North hydro corridor (formerly Morgan’s Grant Hydro Corridor) is in close proximity to the Kanata Tech Park. This serves as an opportune location for a BESS as it would also serve the energy demands of the Tech Park.

Since energy use by the Industrial Sector is the largest in Ontario (40%) and the City of Ottawa (36%), it seems logical that the focus of industrial energy storage would be situated in close proximity to industry; the end user.

### **Site Location**

Choose wastelands, industrial zoned land, exhausted mineral extraction zones (as suggested at ARAC by Ms. Pam Chiles of Rural Woodlands Ottawa), brownfield redevelopment sites, and land already being used for provincial energy infrastructure. Why not site industrial-scale BESS adjacent to high-voltage circuits using the 150m residential set-back proposed for Marchurst Rd? Usage of these areas is unlikely to meet opposition, and usage of these lands would allow them to provide value to the City of Ottawa.

The City of Ottawa has several such uninhabitable sites that could be used that would be far more appropriate than the land that grows our food. So why instead of discussing these sites with Evolgen, is the City allowing Evolgen a second attempt at siting this industrial project in West Carleton? Surely the City would not place a higher value on uninhabitable vacant lands in its portfolio than it would on the land of Ward 5 taxpayers?

The current land chosen for this project is zoned RU. Are industrial-scale BESS limited to RU zoning? And if so, why? Any rural zoning seems the least appropriate, given our dwindling arable lands.

In its August 2024 Fact Sheet entitled “Battery Energy Storage System Recommendations” the Ontario Federation of Agriculture (OFA) recommended that “regulators and the Ministry of Energy prioritize the siting of all energy infrastructure on commercial and industrial land and not allow siting on Canada Land Class 1 through 4 or Specialty Crop Lands.”

We concur.

## **We should Question Our Idealization of Growth as a Society**

We as a society idealize growth. We live by the model that we must constantly grow in population and industry in order to thrive as a city, province, nation.

Is it possible that at some point, growth becomes detrimental to our society?

Especially rapid growth.

As stated above, our GDP per capita is falling as our national population increases at an unprecedented rate.

Is it possible that our productivity, wealth and contentment can increase without constant expansion and strain on our resources?

Are we considering these thought experiments, and challenging our societal beliefs as we plan for the future?

## **Are we really doing this to be sustainable?**

Is it sustainable to keep adding residents and industry when infrastructure and resources are being considered in relative hindsight?

Are we truly adopting green energy with careful consideration of the costs and associated risks?

Or are we adopting it to take advantage of limited-time corporate incentives?

Are we adopting it to meet political targets, without consideration for the downside, or what responsibility we have to ensure the safety and green-ness of our energy sources in the long-term?

We have no information guaranteeing that the materials for the Marchurst Rd. BESS are sourced in an environmentally responsible manner. We also would like guarantees that no child labour or human slavery will be used to harvest or manufacture these batteries, as these are anathema to our Canadian values.

On January 22, 2025, Ward 5 residents asked Evolugen representatives what will be done with the Lithium Iron Phosphate (LiFePO<sub>4</sub>) batteries from this BESS project at the end of battery lifespan, and ultimately at the end of the 22-year project term. Evolugen stated that the batteries would be sent offshore to China or India for breakdown and recycling, though the recycling process required for LiFePO<sub>4</sub> batteries has not yet been established.

So the answer is, no one really knows where they will end up.

Is it responsible in 2025 for us to be implementing “green” energy projects that include industrial-sized chemical batteries that cannot yet be disposed of properly?

Further, is it responsible for us to entrust and cast the responsibility of proper disposal of these batteries to countries with far less stringent, if any, environmental and human rights policy? This is negligence, and as a society we are already complicit.

Perhaps we can do better going forward?

### **Conservation of Energy**

Aside from offering cost incentives to those who use energy during off-peak times, why are we not focusing on conserving energy? Rather we’re focusing on creating more and more instead of using what we have more efficiently.

As stated by Evolugen, the IESO’s purpose in creating the industrial-scale BESS facilities in Ontario is in large part to store energy that must be discharged overnight from our provincial nuclear power plants. This energy must be discharged at night during periods of low provincial demand, and so it is sold at a loss to the United States.

With the resources, intelligence, technologies and innovation available in our nation, surely there is a way to convert our industrial peak demand for energy from daytime to night?

If Nokia and similar tech companies wish to expand their operations in Kanata North, should they not be required to propose solutions as to how they can use less energy? To convert more of their energy demand to off-peak hours? Or at least to contribute to the creation and storage of the energy that they’ll consume? Perhaps they can provide land for a BESS site?

It seems that we cater to the demands of multi-billion dollar corporations for fear of losing their business. Do we not believe that we have more to offer?

If challenges are presented not with blame or as a threat, but with the intent of allowing all involved to be empowered to brainstorm the solutions, it may be that we find solutions to our energy dilemmas that never otherwise would have come to light.

Nokia has an entire section of their website dedicated to the innovative solutions they can offer the energy sector. Are we asking them how they can help to build a more efficient Tech Park in order to facilitate the very growth that they’re seeking?

## **Invest in Ottawans**

Why are we focusing on industrial scale solutions that benefit solely for-profit companies?

It may come as a surprise to the masses, but Ward 5, in spite of this document, is not at all opposed to green energy production, or energy storage solutions; however these systems must consider the communities involved, which was not done in this case.

Many residents live off-grid, or produce green energy that they contribute back to the grid, demonstrating that this is not a case of “NIMBYism” but rather to highlight that the Marchurst Rd. BESS is only being proposed because of the company’s tight timelines and not because it benefits the Ward.

We are now witnessing how industrial-scale green energy projects (industrial wind turbines, and now industrial BESS projects) can tear a community apart when not approached with care.

Mr. Carl Haeussler of Evulugen stated that small-scale battery storage systems need work before they can reliably and safely provide the energy storage we need in our province. We also clearly need to develop facilities and best practices for recycling the components of these energy systems as we develop them.

So why isn’t this work being done? Why are funding, tax breaks, and serious incentives focused on major industry for-profit organizations?

Our federal, provincial and municipal governments can answer these questions. One can speculate that near-sighted cost-savings, efficiencies and corporate gains are being favoured over long-term sustainable options that have more short-term costs, lower profits, and less capacity to be completed within a government office term.

There is virtually no meaningful support for small-scale solutions, especially small-scale wind generation, which would thrive in our Ward. If the City of Ottawa wanted to develop safe residential and mid-scale energy production and storage systems, it is highly likely that many residents would adopt this, thereby addressing our growing energy demands in record time.

We rural residents are keen for green energy solutions. At the ARAC meeting Ward 5 resident and farmer Mr. Mark MacGowan mentioned that they’re considering green energy solutions to increase the resilience of their tree farm. Likewise, Ward 1 Councillor Matt Luloff expressed his interest in small-scale energy storage for his own residence.

Some rough calculations dictate that if 200,000 of the 471,570 households in the City of Ottawa had the capacity to store 10kW of energy each, it would be enough energy for a city of 1.6 million people.

While it is perhaps unrealistic that 200,000 households would participate in such a program, what is likely is that farmers and rural residents would take up this cause with enthusiasm.

A small-scale BESS at the roadside of farms throughout the rural wards could contribute much more than 10kW each.

And imagine what could happen if small-scale wind turbines that are ESA-approved were available in our windy Ward along with these small-scale storage systems? And if there were any additional municipal incentives provided for uptake of these green-energy solutions.

This is the future.

The City of Ottawa has an opportunity to lead this empowering small-scale energy movement, an initiative that would not only lead to self-sufficiency and resilience in the National Capital Region, but would also create a new model for energy solutions province and nation-wide.

This is directly in line with the City of Ottawa's Strategic Plan; to create a city that is green and resilient.

### **In Summary**

We are not against green energy, or the concept of energy storage systems that are carefully sited with community consent, and of a scale that is site-appropriate.

However, given the reasons detailed in Part One of this communication, we, the residents of Ward 5, West Carleton-March, are firmly opposed to Evolugen by Brookfield Renewables' 250MW BESS proposal for the Marchurst Road site on the Carp Ridge. And we will remain so.

Thank-you,

On Behalf of the Residents of West Carleton-March, Ward 5, City of Ottawa

References not cited in text:

Safety of Grid-Scale Lithium-Ion Battery Energy Storage Systems, University of Oxford, 2021

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010106/EN010106-004026-DL2-%20-%20Alan%20Smith%20ResearchGate%20Li-ion%20BESS%20safety%20concerns\\_Redacted.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010106/EN010106-004026-DL2-%20-%20Alan%20Smith%20ResearchGate%20Li-ion%20BESS%20safety%20concerns_Redacted.pdf)

Ontario Federation of Agriculture Fact Sheet: Battery Energy Storage Recommendations, 2024

<https://ofa.on.ca/wp-content/uploads/2024/08/Battery-Energy-Storage-System-Recommendations-Fact-Sheet-Updated-May-2024.pdf>