

18 August 2025

Koren Lam
Lanark County
99 Christie Lake Road
Perth, ON K7H 3C6

AND

Melanie Knight, Director of Development Services and Engineering
Municipality of Mississippi Mills
14 Bridge St.
Almonte, ON K0A 1A0

**Re: Brown Lands, Almonte
Draft Plan of Subdivision – County File No. 09-T-23005
Zoning By-law Amendment – Municipal File No. Z-04-23
Comment Response Letter #3**

Dear Koren and Melanie,

Further to Staff's consolidated Comment Letter provided to us on September 18, 2024 and subsequent meetings and correspondence, please find a comprehensive response to Staff's comments below. In support of our comment responses, please find attached the following revised Draft Plan, Geotechnical report and supporting comment response letter:

- Draft Plan of Subdivision of Parts of Lots 34-40, 46, 77, 79, 81-82, 84-87, 99-100, 108-109, 167-168, and 176-177 and all of Lots 20-28, 47-76, 78, 80, 83, 92-98, 101-107, 115-166 and 169-175 and Part of MALLOCH STREET, JAMES STREET, MARY STREET, WILLIAM STREET, MALCOLM STREET, AND JOHN STREET (CLOSED BY BY-LAW LC204530) BURNSIDE SECTION PLAN 6262, dated September 2024, prepared by Novatech.
- Geotechnical Investigation – Proposed Residential Development – Brown Lands – County Road 29 and Strathburn Street - Almonte, Ontario, PG6260-2, Revision 3, dated September 20, 2024, prepared by Paterson Group Inc.
- Geotechnical Responses to MVCA Comments, Proposed Residential Development, PG6260-MEMO.03, dated September 20, 2024, prepared by Paterson Group Inc.

In addition to the above, further discussion was completed with the MCVA and their comments have been satisfied, as documented in the attached email and letter:

- Email To Alex Zeller, "Brown Lands - Wetland Hydrology - 09-T-23005", dated October 8, 2024, sent by Diane Reid, MVCA.
- Slope Stability Analysis, Engineering Review of the Draft Plan of Subdivision Application for the Brown Lands Subdivision, Townships of Mississippi Mills, PMMSB-32, 09-T-23005, dated October 15, 2024, prepared by Christopher Stoddard, Geotechnical Engineer, MVCA.

Following the receipt of above comments, the Municipality of Mississippi Mills retained Parsons to complete a further review Transportation report. The comments from the resulting memorandum (Brown Lands Subdivision – Technical Review Memorandum, dated March 25, 2025, prepared by Basel Ansari, P. Eng., Parsons) have been addressed by the following transportation engineering memorandum:

- Traffic Impact Study Addendum/Response to December 2024 Comments, dated July 9, 2025, prepared by Novatech.

Municipality of Mississippi Mills

Planning Department – Timing of Application

1. As discussed at a meeting with the applicant on September 5, 2024, the target date for a public meeting is October 15, 2024. This meeting will be a statutory public meeting for the Zoning By-law Amendment and a non-statutory public meeting for the Subdivision Application. Following the public meeting, a recommendation report will be presented to Committee of the Whole with the draft plan conditions and item 4 below. Please note that this schedule is contingent upon addressing the comments contained herein.

Regional Group: Noted – a Public Meeting was held on June 3, 2025.

Planning Department – Blocks 153 and 154

2. Prior to the Municipality confirming acceptance of Blocks 153 and 154, the Municipality would like to understand the implications of accepting the Blocks that are also wetland enhancement areas in terms of long-term maintenance of the area.

Response: Arcadis: As part of the MVCA permit to remove the wetlands, it is expected that there will be a requirement for the proponent to ensure the habitat restoration proceeds as planned for the first 5 years of the restoration. A detailed ‘Habitat Enhancement and Monitoring Plan’ has been proposed in the EIS to provide a framework for this requirement. At the conclusion of this 5-year monitoring period, it is expected that there will be no further formal obligation on the proponent or the municipality to maintain this habitat.

Please provide details as to the responsibility of the 5-year monitoring period.
Please be advised that the Municipality will not be responsible for this monitoring period.

Arcadis: The details of the monitoring period will be outlined in the Habitat Enhancement and Monitoring Plan during detailed design. It is understood that the requirement for this plan will be a condition of draft approval.

3. The Municipality echoes the request by the MVCA (letter dated September 4, 2024) that a discussion is needed to address how hydrological impacts to the wetland from the stone

dust pathway will be avoided. Further discussion on this matter is not a prerequisite for the Committee of the Whole meeting outlined in #1 above.

Arcadis: Please refer to the response for comment 10.

Novatech: The stormwater management (SWM) design criteria presented in the Serviceability and Conceptual Stormwater Management Report (Novatech, July 2024), is to provide sufficient flow to the North Tributary to maintain ecological function under post-development conditions (Section 2.2.4). The conceptual SWM design accomplishes this by directing the rear yard drainage from the proposed lots to the west of the North Tributary to flow to the North Tributary. As demonstrated in Table 2.4 (Section 2.4.4), post construction flows to the north tributary are modelled to be within 3% of pre-development flows.

Planning Department – 0.3 metre Reserves

4. While the Municipality appreciates that Regional Group owns the adjacent lands, its the opinion of Municipal staff that it is good practice to impose 0.3 m reserves along the lot lines which abuts the vacant lands to the north (Blocks 145, 144, 156 and Lots 70 to 77, 105 to 108) to avoid any encroachments/access by future residents.

Regional Group: 0.3m reserves have been added at the termination of Street Five and Street Six at the rural lands. In meetings with Municipal Staff, it was agreed that a 0.3m reserve along the rear yards backing onto existing rural lands is not required.

Engineering and Public Works Department – Transportation

5. The Municipality has completed a neighbourhood survey regarding the possibility of closing Strathburn to restrict vehicular cut through traffic through the neighbourhood. In addition, the Municipality is of the opinion that restricting vehicular access from Strathburn to Malcolm may be endorsed by staff subject to the following:
 - a. Attached to these comments is a conceptual design of a cul-de-sac and pedestrian path located on Strathburn which would permit access to the subdivision and maintain existing accesses on Strathburn. The Municipality requests that the applicant use this concept to develop a conceptual design for review.
 - b. It is the opinion of the Municipality that the entire cost of the design and construction of these road modifications are to be borne by the applicant.
 - c. The timing of construction of the cul-de-sac will need to be determined prior to draft plan approval through consultation with staff.
 - d. The final approval of the cul-de-sac rests with Mississippi Mills Council. Staff will present this request to Council along with the draft plan recommendation at the same meeting.

Regional Group: Following receipt of this the Letter from Municipal Staff in September 2024, Regional Group has participated in meetings with both Municipal Staff and members of the public to work towards a technical resolution to the comments above. Throughout the application, it is been our opinion that the requested works do not fall under the definition and scope of 'local services' under both the *Planning Act* and *Development Charges Act*. The peer review completed on behalf of the Municipality (Parsons, March 2025) generally supported the findings of the Transportation Impact Study prepared by Novatech Engineers.

Regional Group has reached an understanding with the Municipality regarding the scope and implementation of some offsite improvements.

6. Please be advised that in light of the above comment (#5), the Transportation Impact Study will need to be updated to assess the traffic impacts with a cul-de-sac at Strathburn.
Regional Group: Refer to comment response #5 above. As Parsons peer review generally supported the original recommendations from Novatech Engineers transportation report, the TIS has not be updated.

7. Please be advised that the Transportation Master Plan (TMP) is now posted for the required 30-day comment period. The draft TMP proposes that Strathburn and Malcolm Streets be classified as local streets as opposed to the current classification of collector roads. To access the draft TMP please refer to this link: <https://www.mississippimills.ca/en/how-we-go.aspx>

Regional Group: As noted in Table A-1 of the Parsons Technical Review (March 2025), the original TIS was prepared prior to the approval of the 2024 Mississippi Mills TMP and is based on data from the previous 2016 TMP. Since the application is to rely on the policies that were in force on the date that the application was filed, the TIS has not been updated to reflect the new 2024 MMTMP.

8. Please be advised that a Notice of Motion has been included in the September 10, 2024, Committee of the Whole agenda regarding the installation of traffic lights or a roundabout at the intersection of County Road 29 and Street One. Please refer to the agenda.

Regional Group: Noted – we would request a further update on this matter.

Mississippi Valley Conservation Authority

Environmental Planning Review

We request that the following items be addressed prior to moving forward:

9. All recommendations with respect to the Slope Stability Assessment (refer to the attached technical memo entitled MVCA SWMP & SSA Technical Memo_ 09-T-23005_Brown Lands_Aug 2024.pdf).

Regional Group: Noted.

10. Given the reduced wetland setbacks for several lots, Street Six, and parts of the stone dust pathway, we request a discussion as to how hydrological impacts to the wetland will be avoided.

Arcadis: As discussed in a call on September 16, 2024, a number of specific design criteria will be included in the Habitat Enhancement and Monitoring Plan provided during detailed design to address these hydrological concerns. It is understood that the requirement for this plan will be a condition of draft approval.

The two key criteria that will be addressed in the Habitat Enhancement and Monitoring Plan are as follows:

1. Surface water from rear yards adjacent to the restoration area should be diverted towards the wetland habitat to offset the loss of overland flow within the corridor. The extent of rear yards that contribute flow will be determined during detailed design to achieve the intended objective of maintaining hydration to the wetland features.
2. Post-development, major system flows within the north tributary and associated wetland features shall match Pre-development conditions within the development area, within a reasonable degree of accuracy.

It is expected that other design criteria will be formalized as we move forward with detailed design and the design of the habitat enhancement/compensation areas.

See email confirming acceptance of responses (D. Reid, October 8, 2024).

Stormwater Management and Slope Stability Engineering Review

11. In section 6.9 Slope Stability Analysis under Field Observations, it states “The slope observed at the west portion of the site was observed to have an approximate incline ranging between 2.5H:1 to 3.5H:1V”. Is this describing the “West Tributary” area of the site’s slope that is referenced throughout the report? If so, please clarify what the slope’s properties are based on i.e. slope height, toe of slope location, distance from toe of slope to water’s edge, etc.
Paterson: Refer to Geotechnical Responses to MVCA Comments, Proposed Residential Development, PG6260-MEMO.03, dated September 20, 2024, prepared by Paterson Group Inc.
12. In section 6.9 Slope Stability Analysis under Field Observations, it states “The slope observed at the east portion of the site was observed to have an approximate incline ranging between 2H:1 to 3H:1V”. Is this describing the “Mississippi River” area of the site’s slope that is referenced throughout the report? If so, please clarify what the slope’s properties are based on i.e. slope height, toe of slope location, distance from toe of slope to water’s edge, etc.
Paterson: Refer to Geotechnical Responses to MVCA Comments, Proposed Residential Development, PG6260-MEMO.03, dated September 20, 2024, prepared by Paterson Group Inc.
13. Section 6.9 Slope Stability Analysis under Toe Erosion and Erosion Access Allowance for the “West Tributary” does not include a discussion of erosion access allowance. However, a 6 m access allowance is shown in the cross sections Figure 2A and 2B in Appendix 2. Please add the relevant discussion to the body of the report.
Paterson: Refer to Geotechnical Responses to MVCA Comments, Proposed Residential Development, PG6260-MEMO.03, dated September 20, 2024, prepared by Paterson Group Inc.
14. Section 6.9 Slope Stability Analysis under Toe Erosion and Erosion Access Allowance for the “North Tributary” states “Given that no stable slope setback or toe erosion setback is required along the slope adjacent to the north tributary, an erosion access allowance is not required.” Using this rationale to justify a 0 m erosion access allowance is not generally accepted, and a 6 m access allowance is generally required to allow for future maintenance of the slope as per the MNR Technical Guide for Erosion Hazard Limit.

Paterson: Refer to Geotechnical Responses to MVCA Comments, Proposed Residential Development, PG6260-MEMO.03, dated September 20, 2024, prepared by Paterson Group Inc.

15. We request the following at the detailed design stage:
- A detailed review of the proposed grading plan;
 - Confirmation of conformance with permissible grade raise recommendations, as required;
 - An updated Geotechnical Investigation Report including slope stabilization recommendations;
 - Mitigation measures such as supplement flows/ surface infiltration associated with the channel enhancement and wetland compensation of the North Tributary identified in the Environmental Impact Study (EIS);
 - Details regarding the underside of footing (USF) elevations and Hydraulic Grade Line (HGL) analysis;
 - Adequate erosion protection and energy dissipation measures at the based of the embankment and/or along the shoreline of the Mississippi River.

Regional Group: Noted.

See technical memorandum confirming acceptance of responses (C. Stoddard, October 15, 2024).

Enbridge

16. Enbridge Gas does not have changes to the previously identified conditions for this revised application(s).

Regional Group: Noted.

We trust that the responses above will be sufficient for Staff to provide draft plan conditions for this application, however please do not hesitate to contact the undersigned should you have any comments or questions.

Strathburn Almonte Regional Inc
(c/o Regional Group)



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