

The Mississippi Mills Residents' Association  
PO Box 745, Almonte ON K0A 1A0

September 29, 2008

Hon. George Smitherman,  
Minister of Energy and Infrastructure,  
Hearst Block, 4th Flr, 900 Bay St  
Toronto ON M7A 2E1

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Dear Honorable Minister,

**Re: Pause for Thought on Sewage Treatment Plant, Mississippi Mills**

You have recently received a request from the Town of Mississippi Mills (the Town) seeking a grant of about \$7.0 million from the Province to help construct a new sewage treatment plant. The Mississippi Mills Residents' Association<sup>1</sup> (MMRA) asks that the Province deny the Town's request on environmental and economic grounds, in light of possible non-compliance with the Provincial Policy Statement on Land Use Planning<sup>2</sup>.

Background

Mississippi Mills is an amalgamated municipality comprising the former rural townships of Pakenham (est. pop. 2,100) and Ramsay (est. pop. 5,200) and the urban town of Almonte (est. pop. 4,400).

The Town has initiated a contracted design study for an estimated \$21.0 million mechanical sewage treatment plant. The Town believes equal federal, provincial and municipal contributions will be forthcoming to address the capital cost requirements. The Town received a political commitment of \$7.0 million from the federal Member of Parliament in February 2007 and the Town plans to contribute \$7.0 million.

The Town has given approval or draft approval to four subdivisions around the old town of Almonte, our main urban centre. When completed, these four developments will add about 1300 or more new homes (or about 3,300 people) to Almonte, almost doubling its population. The current sewage lagoon system would not provide adequate capacity for these new units, therefore, the implicit justification for a new sewage treatment plant is primarily to service these four developments.

The environmental impact

We believe, as your government does<sup>3</sup>, that sprawling urban development is no longer a tenable strategy for Ontario. The majority of residents in these 1300 new homes would work in Ottawa (Kanata or downtown). A one-way, peak-hour commute from Almonte is 35 to 60 minutes. Cars are the only viable commuting option from Almonte in the future, as no commuter transit plans are being considered at the county or municipal level. Given the very real challenges of adapting to climate change, it is pure folly to add several thousand more inter-urban car trips daily, not to mention the inflationary pressures of rising fuel prices. The MMRA believes that every opportunity must be taken to limit the environmental impact

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<sup>1</sup> The MMRA is a civic-oriented, community based association that has existed since 2002, to give voice to ongoing concerns and issues raised by residents of the Town of Mississippi Mills.

<sup>2</sup> Provincial Policy Statement (2005): <http://www.mah.gov.on.ca/Page1485.aspx#preamble>

<sup>3</sup> Provincial Policy Statement (2005): The Provincial Policy Statement provides for appropriate development while protecting resources of provincial interest, public health and safety, and the quality of the natural environment.

of urban sprawl.<sup>4</sup> This means urban growth should be contained to where people's work and homes are in close proximity. Develop where infrastructure is already in place so that marginal costs are smaller. Create housing where public transportation alternatives are available. In our region that means containing urban growth to the City of Ottawa.

The alternative is not merely the huge carbon footprint, but also the real costs that Ontario taxpayers will be forced to pay to support urban sprawl. For example, there will undoubtedly be additional financial demands placed on the Province if speculative development goes unchecked. Doubling the population of Almonte will create safety concerns along the two-lane road (March Road) that connects Almonte to highway 417 (14 kms) and north Kanata (25 kms), leading to demands for four lanes. This is not idle conjecture, but what is actually happening right now between Carleton Place, our neighbour to the south, and the City of Ottawa.<sup>5</sup>

### The business case

The MMRA is not against smart growth or infrastructure improvements. Slow urban growth through infilling and moderate densification in the Almonte core is the most effective route to take, allowing the sewage infrastructure to be upscaled to fit moderate growth scenarios. Many residents of Mississippi Mills continue to have serious concerns about the Town's current path and have not found an adequate business case to justify why a mechanical treatment plant of this size is considered the best option.<sup>5</sup>

The onus is squarely upon the Town to put forward a credible business case to justify a taxpayer commitment, in support of this capital project, totalling over \$21.0 M. We believe the business case is not there. In fact, the population projections upon which development is being predicated and approved, (and hence, the justification for this capital project) are greatly overstated according to the 2006 Census. Results of the 2006 Census showed that the Town had only grown by 0.7% in the previous 5 years and Almonte had shrunk by 2.6%. Furthermore, the severe current economic downturn is not anticipated to reverse quickly, making such projections even more dubious.

Residents have legitimate concerns which have not been addressed: for instance, how much higher will tax bills and user fees actually be for a smaller population base if development charges do not materialize? Why are the developers' contributions via development charges not in line with the current market price (e.g. in Ottawa, Carleton Place, etc.)? Can residents expect the provincial and federal tax bases to continue to subsidize obsolete municipal development strategies? If the municipality intends to augment its debt to provincial limits as a result of this project, how will debt service charges be apportioned between rural residents (non-Almonte residents who do not use the sewage system) and urban (Almonte) taxpayers?

One final issue that affects the business case for the sewage treatment plant is the apparent lack of a strategy to address the requirements of the Clean Water Act regarding rural septage. This may have a significant impact on the final cost of the solution if it is to be incorporated within the scope of the sewage treatment plant. Residents ask what's "fair and fitting". If septage treatment becomes a service commitment, what's a fair portion of the costs for rural users? If urban development drives sewage treatment capacity, what's a fair tax and user charge Almonte residents must absorb?<sup>6</sup> Since a mid-term

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<sup>4</sup> Provincial Policy Statement (2005): 1.1.1 Healthy, liveable and safe communities are sustained by:

- a) avoiding development and land use patterns which may cause environmental or public health and safety concerns;
- e) promoting cost-effective development standards to minimize land consumption and servicing costs;

<sup>5</sup> Provincial Policy Statement (2005): 1.6.4.2 Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas. Intensification and redevelopment within settlement areas on existing municipal sewage services and municipal water services should be promoted, wherever feasible.

<sup>6</sup> Provincial Policy Statement (2005): 1.6.4.1 Planning for sewage and water services shall: ...e) allow lot creation only if there is confirmation of sufficient reserve sewage system capacity and reserve water system capacity within municipal sewage services and municipal water services...

review is now required for the Town's Official Plan, revisions to growth projections should also be addressed in that process before major decisions are made on outdated assumptions.

Based on these arguments we ask the Province to carefully consider the justification for funding the Almonte sewage treatment plant, but more importantly to encourage the Town to reconsider its growth scenarios and revalidate all assumptions.

Sincerely,

The Board of the Mississippi Mills Residents' Association

Copies:

- Hon John Gerretsen, Minister of the Environment, 135 St. Clair Ave W, 15th Flr, Toronto ON M4V 1P5 ([jgerretsen.mpp@liberal.ola.org](mailto:jgerretsen.mpp@liberal.ola.org))
- Hon Jim Bradley, Minister of Transportation 77 Wellesley Street West, Ferguson Block, 3rd Floor, Toronto, ON M7A 1Z8 ([jbradley.mpp@liberal.ola.org](mailto:jbradley.mpp@liberal.ola.org))
- Hon Gordon O'Connor, Member of Parliament, Carleton-Mississippi Mills, House of Commons, Ottawa, Ontario K1A 0A6 ([OConnor.G@parl.gc.ca](mailto:OConnor.G@parl.gc.ca))
- Al Lunney, Mayor, Town of Mississippi Mills, 3131 Old Perth Road, RR 2, P.O. Box 400, Almonte, Ontario K0A 1A0 ([al.lunney@sympatico.ca](mailto:al.lunney@sympatico.ca))
- Diane Smithson, Chief Administrative Officer, Town of Mississippi Mills, 3131 Old Perth Road, RR 2, P.O. Box 400, Almonte, Ontario K0A 1A0, ([DSmithson@mississippimills.ca](mailto:DSmithson@mississippimills.ca))