

Burlington Sustainable Development Advisory Committee

Comments on: Conservation Halton Guidelines for Stormwater Management
Engineering Submissions, **Draft- June 2020**

Overall Comment: Generally, approve of the draft document

The following are specific comments:

- 1. Figure 1-1** identifies watersheds managed by Conservation Halton. Some streams within these watersheds, for example in Burlington the lower reaches of Rambo and Hager Creek, downstream of the Hager- Rambo Diversion Channel, are not identified. Streams in other communities downstream of flood control diversion channels may also have been omitted. These reaches are streams in their own right and should also be managed by Conservation Halton. Further, Figure 1-1 should identify the jurisdiction, if any, of Conservation Halton in the management of the shorelines of Lake Ontario and Burlington Bay.
- 2. Section 2.3.3 Phosphorus.** It is suggested that *all* impacted watersheds and subwatersheds should be assessed for phosphorus control as a best practice to prevent eutrophication and damage to ecosystems. Furthermore, controls to address total suspended solids (TSS) are identified in the document as an effective method to remove phosphorus, but such controls would not be effective at removing solubilized phosphorus (e.g., run-off from fertilized agricultural land or urban lawns) without a preceding precipitation step.
- 3. Section 2.3.4. Water Quality Other Contaminants.** It is assumed that water quality objectives for other contaminants would attempt to meet Water Management Policies, Guidelines, Provincial Water Quality Objectives of the Ontario Ministry of the Environment, Conservation and Parks. However, these objectives are not identified.
- 4. Section 4.2.2 Hydrologic Analysis Rainfall Input.** Because of climate change, storms may now have a severity greater than that of the Regional Storm (Hurricane Hazel, 1954). Models to identify a safety factor to account for climate change applied to the Regional Storm and all other rainfall data would be desirable, if not already accounted for in the provided references. Such safety factors may require development of new models considering meteorological predictive data.