

Pilon, Janet

Subject: Comment Re: Revised Payment Mechanism for Stormwater Management Program

From: Hiroz, David

Sent: June 26, 2023 1:39 PM

To: clerk@hamilton.ca

Subject: Comment Re: Revised Payment Mechanism for Stormwater Management Program

To whom it may concern,

I am writing regarding the City of Hamilton's proposed change in the way it calculates a property's payment towards the City's stormwater management program. Having reviewed the available information on how future payments will be calculated for a property (e.g., calculated based on the actual amount of impervious area surfaces a facility has, measured by aerial photography), I feel that our facility will be prejudicially impacted by this change. I say this because it will be assumed that, due to our facility having a relatively significant proportion of the site covered by impervious materials, that we have a high contribution of stormwater run-off to the city infrastructure, which is incorrect.

Although our facility has a large proportion of its surface covered by impervious surfaces (e.g., asphalt, concrete, roofs, etc), our facility is designed in such a way that our stormwater run-off is re-directed back into the facility's on-site water storage structures (e.g., our ditch and trench systems) for use within our process. This serves as a cost reduction measure for our facility, as it reduces our reliance on alternative – more costly – water sources and supports our corporate sustainability goals. Further to this, based on some of the physical characteristics of the product that we manufacture (e.g., it stays in suspension when in water) we do not allow our overland flow to enter the City infrastructure to ensure we maintain compliance with the sewer discharge criteria as the suspended solids would likely pose an issue.

Therefore, based on the comments provided above, a revised mechanism whereby properties/facilities are charged for their contribution to the City stormwater management program solely based on the amount of impervious surfaces they have, would be wholly unfair and inaccurate.

I hope that you take into consideration the comments that I have provided above and, if the city still plans to move ahead with this revision that they include a mechanism for facilities to be individually evaluated and potentially exempted from the proposed payment mechanism and are provided with an alternative mechanism that would be more applicable to their individual circumstances.

Should you require any additional information, please do not hesitate to let me know.

Best Regards,

David Hiroz Ph.D. PMP
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