

January 12, 2021

James Hutson, Robert Cascaden and Members of Council
10227 Ilderton Road
RR# 2
Ilderton, Ontario
N0M 2A0

Re: Komoka Stormwater Management and fee

To whom it may concern,

I am requesting that the stormwater levy be changed for at least Komoka so that the levy rate is different based on the stormwater use profile of the lot. I believe that Komoka is not unique and my points below apply to other urban settlements.

To support this request I will use Komoka and my lot as an example. My lot is typical of most of "old" Komoka developed prior to the lift of the development freeze. It has the following stormwater profile:

1. Eavestroughs empty on to my property.
2. Road is crowned to shed water freely on to my property. No concrete curbs or gutters.
3. Roadway is at a higher elevation than laneway entrance which slopes down from the road.

I am absorbing and filtering not only the runoff from my structures but the street as well. All stormwater is contained at source within my property. The design of "old" Komoka minimizes its load on the stormwater infrastructure.

In contrast the "new" subdivisions in Komoka, developed after municipal services were implemented, have the following stormwater profile:

1. Some subdivisions have their eavestroughs discharge into underground stormwater infrastructure.
2. All have concrete gutters and curbs to prevent roadway runoff on to their property.
3. Lots are at a higher elevation than the roadway so that their laneway and property drain out on to the street and in to the gutter.

Lots in new subdivisions do not contain all stormwater runoff. They are a major contributor to the load on the stormwater infrastructure in Komoka.

Also a review of the Komoka drainage maps in the SWM Master Plan shows that "new" subdivisions have the majority of inground stormwater infrastructure while "old" Komoka subdivisions use open water conveyance maintained by the home owner.

In summary, I am asking that the Municipality review the stormwater levy and implement a fee structure that recognizes that not all lots benefit the same from stormwater infrastructure. A suggested fee structure could be:

Rate #1: Lots that contain all stormwater within their boundaries. This would be most of "old" Komoka.

Rate #2: Lots that have concrete curbs and gutters.

Rate #3: Lots that have concrete curbs and gutters plus have an underground infrastructure in place for eavestrough and sump pump discharge.

As FYI, I did discuss the stormwater levy review with Public Works and Engineering and although they thought there could be some merit in doing a review that due to current priorities nothing could be started till at least 2022. I am writing this note with the hope that this timeline could be improved and the results of the review would be in place for the 2022 tax year.

During my research on this topic I would like to make a few other comments. See attachment "A".

I look forward to your action and I thank you for taking the time to consider my request.

Paul Houghton

Attachment “A”

Other comments:

1. Stormwater Master Plan:
 - a. Did not identify the stormwater impact of curbs and gutters and eavestroughs emptying into stormwater infrastructure. This should have been mentioned in the text and identified on the maps.
 - b. Except for Ballymote, it made no reference in alternatives to take action to reduce stormwater impact through Low Impact Design. I understand that Public Works is looking into Low Impact Design recommendations this year. The Brantum development (and others) should be looked at now to see how they can be designed to minimize stormwater impact. Why can't all lots be designed to contain storm water runoff as recommended for Ballymote?
2. Development charges: The 2019 Development Charges Study mentioned Stormwater but justified no separate charge. Given the fact that there are Urban Settlement stormwater levies in place for future benefactors and the increased focus on Stormwater management, Stormwater should be identified as an Area Specific Service that justifies its own Development Charge allocation.