

1. Clause 3.1 General (c) – *“developers shall endeavor to reduce flow velocities, promote natural storage, and promote natural storage.”* - Ensure that this covers things like maximizing retention of trees and other vegetation cover, and reducing asphalt coverage on individual lots, parking lots, etc.
2. Clause 3.1 General (l) – *“Attenuation of Stormwater runoff using rooftop storage shall not satisfy any Attenuation requirements in the Development Design Manual.”* – What does this mean? Does this refer to the potential use of green roofs? Would a rain garden be considered rooftop storage if it is fed by a downspout? What is the intent of this policy?
3. Clause 3.1 General (l) and Clause 3.2 Storm Sewer Systems (a) – Is there any language that would encourage the design of storm sewer systems to integrate climate change, LID, and green infrastructure? In particular to use such infrastructure for climate change adaptation and mitigation? I see that section 3.13 discusses climate change, but it would be nice if this was integrated throughout the policy and not just included as an add on.
 - a. See the following:
 - i. Clause 3.4 Parking Lots (b) – *“The City encourages parking lot design that promotes groundwater recharge and erosion reduction.”*
 - ii. Clause 3.4 Parking Lots (c) – *“As directed by the City, parking lot design shall incorporate methods for Stormwater management utilizing LID technology.”*
4. Clause 3.2 Storm Sewer System (d) – *“For Residential Development or Non-residential development, Storm sewer service laterals for new or redeveloped lots shall connect to the City storm sewer system; with such installation being at a time directed by the City.”* – the wording of this item may cause confusion and conflict with the requirement to ensure rooftop runoff in residential development is not connected to the storm sewer system. If this is only to apply to the foundation drain, it may be good to specify.
5. Clause 3.2 Storm Sewer (l) – *“Downspout conveying runoff from rooftops to the ground for Residential Development, except apartment buildings, shall not be connected to the storm sewer system”* – Consider including all development and if a connection, with the option to apply for an exemption.
6. Clause 3.4 Parking Lots (a) – *“Parking lots shall be designed to capture all surface drainage and convey all stormwater into a city storm sewer system or approved Watercourse. Infiltration of some or all Stormwater into the ground may, however, be acceptable where it can be demonstrated to the City’s satisfaction through a geotechnical report that the ground can accommodate the surface drainage without any negative impacts.”* – Unsure of what the rationale for this to be part of the policy as worded and not the design guideline.
7. Clause 3.7 Watercourses (g) – *“Developers may be required, as determined by the City, to ensure that there is an adequate baseflow in receiving rivers and streams for post-Development conditions and that fish habitat is protected.”* – Use in conjunction with management of stormwater.
8. Clause 3.8 Floodplains (e) – *“Existing Dwellings within a Floodplain may be replaced provided the new Dwelling is constructed within the existing footprint and the lowest floor elevation is at least 0.3m above the 100-year high water elevation.”* – Does this incorporate climate change?

9. Clause 3.9 Wetlands (e) – *“lowest floor elevation to be 0.3 metres above the elevation of a wetland.”* – This seems to be a very low minimum (0.3 metres/1 foot).
10. Clause 3.13 Climate Change (a) & (b) – These are good statements but quite general, and should be expanded on, e.g., examples of initiatives in adapting to climate change and innovative practices. I see a lot of initiatives being reported on that are innovative responses to climate change in stormwater management.
11. Clause 4 Application – *“This policy applies to all Development activity in the City, with the exception of City operations and/or actions.”* – the policy doesn’t apply to City operations and/or actions. What is the rationale here? Shouldn’t what is required of developers also apply to City operations?
12. There is no reference to tracking the condition and performance of the City’s stormwater system. If it is covered in other policy documents, perhaps it should be at least referenced in the Stormwater Detention Policy.