

DISCLAIMER

This document is based on normal winter weather conditions, reliability and availability of resources both human and physical. The Municipality does not guarantee a level of service under abnormal or significant weather events nor in the event of a work stoppage.

It is acknowledged that conditions may occur which temporarily prevent achieving levels assigned. In such cases, efforts will be made to keep roads open, consistent with available resources.

This document is designed to utilize plain language to describe the Municipality of Bayham Winter Operations Plan. If there is a conflict between a provision in this document and a provision of [Ontario Regulation 239/02](#), the provisions of [Ontario Regulation 239/02](#) shall apply.

Section 1 – Purpose

The Municipality of Bayham Winter Operations Plan sets out a policy and procedural framework for ensuring that the Corporation of the Municipality of Bayham continuously improves on the effective delivery of winter maintenance services and the management of road salt used in winter maintenance operations, as outlined in Environment Canada's Code of Practice for the Environmental Management of Road Salts and the [County of Elgin Salt Management Plan](#).

The Municipality of Bayham Winter Operations Plan is meant to be dynamic, to allow the Municipality to evaluate and phase-in any changes, new approaches and technologies in winter maintenance activities in a fiscally sound manner. At the same time, any modifications to municipal winter maintenance activities must ensure that roadway safety is not compromised.

As specified in the Code of Practice for the Environmental Management of Road Salts, the Winter Operations Plan for the Corporation of the Municipality of Bayham was endorsed by Council on October 19, 2023.

Section 2 - Definitions

- 2.1 *Anti-icing* means the application of liquid deicers directly to the road surface in advance of a winter event.
- 2.2 *Highway* includes a common and public highway, street, avenue, parkway, driveway, square, place, bridge, viaduct or trestle, any part of which is intended for or used by the general public for the passage of vehicles and includes the area between the lateral property lines thereof.
- 2.3 *Paved Road* means a road with an asphalt surface, concrete surface, composite pavement, or Portland cement surface.
- 2.4 *Pre-treat* means the application of liquids (calcium chloride, sodium chloride, etc.) to dry sand or salt prior to being loaded for storage or applied to the road surface.
- 2.5 *Pre-wetting* means the application of liquids (calcium chloride, sodium chloride, etc.) at the spinner of the truck just prior to application to the road surface.
- 2.6 *Significant Weather Event* means an approaching or occurring weather hazard with the potential to pose a significant danger to users of the highways within the Municipality as per the Significant Weather Event Policy attached hereto as Appendix 'D'.
- 2.7 *Surface Treated Road* means a road with bituminous surface treatment comprised of one or two applications of asphalt emulsion and stone chips over a gravel road.
- 2.8 *Unpaved Road* means a road with a gravel or sand surface.

2.9 *Winter Event* means a weather condition affecting roads such as snowfall, wind-blown snow, freezing rain, frost, black ice, etc. to which a winter event response is required.

2.10 *Winter Event Response* means a series of winter control activities performed in response to a winter event.

2.11 *Continuous Winter Event Response* means a response to a winter event with full deployment of labour and equipment that plow/salt/sand the entire system.

2.12 *Spot Winter Event Response* means a response to a winter event with only a part deployment of labour and equipment or with full deployment to only part of the system

2.13 *Winter Event Response Hours* means the total number of person-hours per year (plowing, salting/sanding, winging back, etc.) to respond to winter events.

Section 3 - Objective

The Corporation of the Municipality of Bayham is committed to improving winter maintenance operations while continuing to ensure public safety. The Corporation of the Municipality of Bayham will optimize the use of winter maintenance materials containing chlorides on all municipal roads while striving to minimize negative impacts to the environment. The Corporation of the Municipality of Bayham Staff will strive, insofar as reasonably practicable, to provide safe winter road conditions for vehicular and pedestrian traffic as set out in the level of service policies and within the resources established by the Council of the Corporation of the Municipality of Bayham.

Section 4 - Policy Statement

The Corporation of the Municipality of Bayham will provide efficient and cost effective winter maintenance to ensure, insofar as reasonably practicable, the safety of users of the municipal road network in keeping with applicable provincial legislation and accepted standards while striving to minimize adverse impacts to the environment. These commitments will be met by:

- i. adhering to the procedures contained within the Municipality of Bayham Winter Operations Plan;
- ii. reviewing and upgrading the Municipality of Bayham Winter Operations Plan on an annual basis to incorporate new technologies and new developments;
- iii. committing to ongoing winter maintenance staff training and education; and
- iv. monitoring on an annual basis, the present conditions of the winter maintenance program, as well as the effectiveness of the Municipality of Bayham Winter Operations Plan.

Section 5 – Winter Maintenance Program

The major activities related to winter maintenance are:

- snow plowing
- salt/sand application
- salt/sand storage
- snow removal
- sidewalk plowing
- anti-icing

The Corporation of the Municipality of Bayham is responsible for winter maintenance on:

Table 1

Road Type	Distance (Lane KM)
Paved Roads	214 Lane KM
Surface Treated Roads	268 Lane KM
Unpaved Roads	97 Lane KM

Sidewalks	18 KM
-----------	-------

For the purposes of this winter operations plan, the highways under the jurisdiction of the Corporation of the Municipality of Bayham have been classified (Class 1, 2, 3, 4, 5) as per the following Table 2 which is based on the Classification of Highways table included in [Ontario Regulation 239/02](#).

Table 2

Average Annual Daily Traffic (number of motor vehicles)	Posted or Statutory Speed Limit (kilometres per hour)						
	91-100	81-90	71-80	61-70	51-60	41-50	1-40
15,000 or more	1	1	1	2	2	2	2
12,000 - 14,999	1	1	1	2	2	3	3
10,000 - 11,999	1	1	2	2	3	3	3
8,000 - 9,999	1	1	2	3	3	3	3
6,000 - 7,999	1	2	2	3	3	3	3
5,000 - 5,999	1	2	2	3	3	3	3
4,000 - 4,999	1	2	3	3	3	3	4
3,000 - 3,999	1	2	3	3	3	4	4
2,000 - 2,999	1	2	3	3	4	4	4
1,000 - 1,999	1	3	3	3	4	4	5
500 - 999	1	3	4	4	5	5	5
200 - 499	1	3	4	5	5	5	5
50 - 199	1	3	4	5	5	5	5
0 - 49	1	3	6	6	6	6	6

For the purposes of Table 2, the average annual daily traffic on a highway or part of a highway under the jurisdiction of the Corporation of the Municipality of Bayham shall be determined by:

- counting and averaging the daily two-way traffic on the highway or part of the highway; or
- estimating the average daily two-way traffic on the highway or part of the highway.

Table 3 summarizes the road system in the Municipality of Bayham as follows:

Table 3

	Paved Lane/KM		Surface Treated Lane/KM		Unpaved Lane/KM	
	Rural	Urban	Rural	Urban	Rural	Urban
Class 1	0	0	0	0	0	0
Class 2	0	0	0	0	0	0
Class 3	142	2	0	0	0	0
Class 4	19	0	248	0	0	0

Class 5	25	26	16	4	96	1
Class 6	0	0	0	0	0	0

Section 6 – Level of Service

6.1 Weather Monitoring

From October 1 to April 30, the minimum standard is to monitor the weather, both current and forecast to occur in the next 24 hours, once every shift or three times per calendar day, whichever is more frequent, at intervals determined by the Municipality.

From May 1 to September 30, the minimum standard is to monitor the weather, both current and forecast to occur in the next 24 hours, once per calendar day.

In order to determine an effective winter event response and allocate the appropriate resources the Corporation of the Municipality of Bayham supplements road patrol information with weather information from various sources which includes:

- i. observations from municipal staff;
- ii. communication with staff of adjacent municipalities and MTO contractors;
- iii. monitoring
- iv. monitoring pavement temperatures by means of on-board infrared thermometers which are mounted on the patrol and other trucks, and;
- v. RWIS data and pavement temperature forecasts from municipally owned stations or via a data sharing agreements with other municipalities and/or the Ministry of Transportation

6.2 Snow Accumulation

The minimum standard for addressing snow accumulation is, after becoming aware of the fact that the snow accumulation on a roadway is greater than the depth set out in the Table 4, to deploy resources as soon as practicable to address the snow accumulation, to provide a minimum lane width of the lesser of three metres for each lane or the actual lane width, or on a Class 4 or Class 5 Highway with two lanes, to provide a total width of at least five metres.

If the depth of snow accumulation on a roadway is less than or equal to the depth set out in the Table 4, the roadway is deemed to be in a state of repair with respect to snow accumulation.

For the purposes of this section, the depth of snow accumulation on a roadway may be determined by a municipal employee, agent or contractor, whose duties or responsibilities include one or more of the following:

- i. Patrolling highways;
- ii. Performing highway maintenance activities.

The depth of snow accumulation on a roadway may be determined by:

- i. performing an actual measurement;
- ii. monitoring the weather; or
- iii. performing a visual estimate.

SNOW ACCUMULATION

Table 4

Class of Highway	Depth	Time
1	2.5 CM	4 HRS
2	5 CM	6 HRS
3	8 CM	12 HRS

4	8 CM	16 HRS
5	10 CM	24 HRS

6.3 Ice Formation

The minimum standard for the prevention of ice formation on roadways is doing the following in the 24-hour period preceding an alleged formation of ice on a roadway:

- i. Monitor the weather in accordance with Section 6.1;
- ii. Patrol in accordance with [Ontario Regulation 239/02](#).

If the Municipality determines, as a result of its activities that there is a substantial probability of ice forming on a roadway, the Municipality may treat the roadway to prevent ice formation within the time set out in the Table 5, starting from the time that the municipality determines is the appropriate time to deploy resources for that purpose.

ICE FORMATION PREVENTION

Table 5

Class of Highway	Time
1	6
2	8
3	16
4	24
5	24

If the Municipality meets the minimum standard set out Section 6.3 and, despite such compliance, ice forms on a roadway, the roadway is deemed to be in a state of repair until the earlier of, the time that the municipality becomes aware of the fact that the roadway is icy; or the applicable time set out in the Table 6 for treating the roadway to prevent ice formation expires.

The minimum standard for treating icy roadways after the municipality becomes aware of the fact that a roadway is icy is to treat the icy roadway within the time set out in the Table 6, and an icy roadway is deemed to be in a state of repair until the applicable time set out in the Table 6 for treating the icy roadway expires.

For the purposes of this section, treating a roadway means applying material to the roadway, including but not limited to, salt, sand or any combination of salt and sand.

TREATMENT OF ICY ROADWAYS

Table 6

Class of Highway	Time
1	3 HRS
2	4 HRS
3	8 HRS
4	12 HRS
5	16 HRS

6.4 Public Information

Levels of Service

The Municipality of Bayham has developed carefully planned levels of winter road service to combat the diverse winter weather conditions. A combination of municipally owned vehicles and contracted units provide effective snow plowing services to Elgin County and Municipality of Bayham roads through the highway priority route system.

This system assigns priority to all County Roads with the highest traffic in the Municipality. To ensure the safety of drivers and pedestrians, these County Roads routes are serviced on a priority basis. Bayham Roads are attended to regularly, but less often than Elgin County Roads. Local Hamlet Roads and select sidewalks are maintained by Contractors under Agreements with the Municipality of Bayham.

Winter Operations Priority Index

- 1) Elgin County Roads
 - a. See Appendix 'A'
 - b. By-law No. 2023-080
- 2) Municipality of Bayham Rural Roads
 - a. See Appendix 'B'
- 3) Municipality of Bayham Local Hamlet Roads & Select Sidewalks
 - a. See Appendix 'C'
 - b. Completed by Contractor under Agreement with the Municipality
 - i. By-law No. 2020-069
 - c. Please note, only select sidewalks are maintained for winter operations. The Municipality does not perform snow removal operations around community mailboxes; please contact [Canada Post](#) for snow removal in this area.

6.5 Residents Information

Winter Parking Restrictions

As per the Municipality of Bayham Traffic By-law, parking is not permitted on any Municipal streets from 3:00 a.m. – 5:00 a.m. This ensures the Municipality can completely clear streets of snow and that emergency vehicles can get down the street.

Children's Safety

Please ensure that children do not play where snow is piled at the side of the road or in the middle of courts where municipal equipment operators may not see them.

Driveways

Piling snow to the right side of the driveway can help reduce the amount of snow pushed back into the driveway. Standing in the driveway and looking at the street determines the right side.

Clearing of Snow or Ice from Sidewalks

Every owner of any lot fronting any municipal highway or street where an adjacent sidewalk has been constructed shall remove and/or clear away and keep removed and cleared away all snow and ice from such sidewalk on the street side nearest to such lot, such removal to be completed within twenty-four (24) hours of a snowfall.

Clearing Snow on Private Property

The Municipality devotes a great deal of resources to keep the streets and select sidewalks clear of snow and ice. Residents often deposit snow and ice from their property onto the street or sidewalk not realizing that this contravenes municipal regulations, contributes to unsafe driving and walking conditions and increases the cost of providing winter road maintenance.

When property owners are clearing snow from private driveways, please keep this snow on your property. Your efforts in helping the Municipality make winter driving and walking safe for everyone is appreciated.

Fire Hydrants

The Municipality of Bayham has approximately 118 fire hydrants that need to be cleared of snowfall. The Municipality works hard to keep hydrants clear and available for emergencies, however with heavy snowfalls, this can be challenging. Residents are asked to assist by keeping fire hydrants on their properties clear of snow. Hydrants should have a clearing of one metre (3 ft.) all around and there should be a clear path to the street to ensure firefighters can readily access them. A hydrant can help save lives and property in your community, if you see a hydrant that is buried this winter, please do the neighbourly thing and dig it out.

Damage to Sod

Sidewalk plowing presents many challenges. It is difficult to tell exactly where the edge of the sidewalk is and when the ground is not frozen some sod damage may occur. Damage to Municipal sod, pavement and municipally owned trees may be repaired in the spring, subject to the discretion of the Roads Operation Supervisor or designate.

Contact the Municipal Office when you notice damage and your address will be added to a list for repair, for consideration, when materials are available.

To facilitate the removal of snow from sidewalks and to prevent damage to private property, residents are required not to place cars, fences, posts, hedges, shrubs, driveway curbs or other obstructions on the road allowance. The Municipality will not be responsible for damage to items placed on Municipal property by property owners.

Mailbox Replacement

The Municipality will re-install mailboxes damaged as a result of maintenance activities of an appropriate standard in an appropriate location.

Installation Standards

- i. The post shall be a 4"x4" wooden post.
- ii. Posts will be installed at the rounding of the shoulder, in order that the opening of the mailbox is at the edge of the shoulder with the bottom of the box being (3.5') above the edge of the shoulder.
- iii. Mailboxes on a cantilever arm must meet the same height and setback requirements.
- iv. Mailboxes will be placed on the right hand side of road according to the courier's line of travel in a position where the courier can reach and service it from his vehicle without being an impediment to pedestrian or vehicular traffic, where possible.
- v. Replacement boxes shall be a standard size weather resistant steel rural type mailbox.

Limitations & Exclusions

- i. The Municipality is responsible for the replacement and reinstallation of a mailbox that has been removed or damaged by being physically hit by snow plowing equipment. At the sole, absolute and unfettered discretion of the Road Operations Supervisor or designate, the Municipality will repair when possible or replace a mailbox, if beyond repair, damaged by a snowplow that has physically hit the box.
- ii. Mailboxes hit by snow coming off the plow will not be replaced by the Municipality. The responsibility for maintaining mailboxes lies with the owner of the box. Mailbox owners are required to repair their own mailboxes that have been damaged by snow impact.
- iii. Where any mailbox has been damaged by operations activities, it will be replaced with a standard mailbox and post arrangement with a maximum value of \$50.00.

Timing of Installation

- i. The damaged mailbox will be replaced as soon as weather and labour permit, at the sole, absolute and unfettered discretion of the Road Operations Supervisor or designate. Completion of Winter Control Services on the roadway is a priority.

Roadside Snow Removal

Roadside snow removal operations are only completed within the defined urban communities in the downtown cores of Straffordville, Eden, Vienna, and Port Burwell. Roadside snow removal operations are undertaken when the available snow storage capacity on street will no longer accommodate further snow accumulations. The purpose of snow removal operations is not necessarily for pedestrian convenience but for road safety.

If sufficient storage is lacking along roadway corridors and sight lines are impeded, snow removal may be scheduled at the earliest opportunity as per the following standards.

- i. Roadside snow removal operations may be scheduled and undertaken when the snow banks combined average height and width exceeds a value greater than 1.8 m (6').
- ii. Whenever sightline and safety are compromised as determined by the Road Operations Supervisor or designate.
- iii. Measurements shall not be made until 72 hours following the cessation of a storm event
- iv. Snow removal shall only commence when reasonably feasible within the confines of the Municipal equipment and staff inventory.

Assistance to Private Property Owners

Under no circumstances will a municipal employee be permitted to use municipal equipment to push, pull or tow a stranded private vehicle from a roadway or parking lot. The employee, if a hazard exists, shall use the two-way radio to notify dispatch of the impending danger.

Winter Operations - Frequently Asked Questions

1. What happens when it starts to snow?

The Municipality of Bayham subscribes to an advanced weather forecasting service. Depending upon the timing and nature of the pending storm, staff are brought in to commence winter maintenance activities. Once the storm starts, or is completed, municipal equipment is sent out on designated routes to apply materials as necessary.

2. Why do I never see a municipal equipment when it snows?

It all depends upon where you live. The Municipality's main routes are Elgin County Roads. Depending upon the time of day, traffic volumes and snowfall amounts, the average routes can take varying hours to complete one pass. The municipal equipment will continue back over these routes until the storm has stopped and these roads are clear of snow and ice.

3. Why does the plow not remove all of the snow from my road?

The plows are designed to ride on "guides" (shoes) that raise the blade approximately 13 millimetres (0.5 inches) from the surface of the roadway. This is done to prevent damage to both the vehicle and infrastructure from raised manholes, catch basins or water valves. Once the street has been plowed and sanded, the interaction of the material and vehicular traffic is required to melt the remaining snow cover. Streets with low traffic volumes will therefore remain snow covered longer.

4. Why do the plows always push snow into my driveway?

For a resident this can be quite annoying, but unfortunately, it cannot be helped. The snow must be removed from the travelled portion of the road. When the Municipality receives a heavy snowfall, if possible, do not shovel your driveway until after the plow has gone by. If you must shovel, do not throw the snow out onto the roadway as you may create a hazard for another vehicle, and if an accident were to occur, you might be held liable.

Section 7 - Winter Maintenance Season

The winter maintenance season within which the Corporation of the Municipality of Bayham will perform winter highway maintenance commences on November 13th, 2023 and is completed March 15th, 2024

Section 8 - Winter Preparations

In the months prior to the start of the winter maintenance season, as identified in Section 7, the Corporation of the Municipality of Bayham undertakes the following tasks to prepare for the upcoming winter season.

8.1 Prior to the Winter Season

Prior to the Winter Season the Municipality will:

- i. If required, prepare and call tenders for the supply of materials (salt, sand, liquid), replacement parts (for plows, solid and liquid application equipment), value added meteorological services (VAMS) and contract equipment (plow trucks, spreader trucks, combination units).
- ii. Conduct a mandatory training session for staff and contract operators where all policies, procedures, schedules, reporting procedures for callout, route maps, equipment training and safety precautions will be discussed. Any issues resulting from the meeting with regard to the policies, procedures, schedules, reporting procedures for callout, route maps, equipment training and safety precautions shall be resolved either at the meeting or prior to the winter season.
- iii. Train winter patrollers (or staff whose duties also include patrolling) on the route of representative roads to be patrolled between winter events, their duties during a winter event, recording keeping requirements and callout procedures and the anti-icing chemicals to be applied for the forecast weather conditions.
- iv. Inspect equipment to ensure proper working order. Schedule and complete any and all equipment repairs.

8.2 One Month Prior to the Winter Season

One month prior to the winter season the Corporation of the Municipality of Bayham will:

- i. Post the winter shift schedule in accordance with the municipality's collective agreement, if any.
- ii. Calibrate material application equipment.
- iii. Allow operators (staff and contract) time to familiarize themselves with any new equipment, material application rates, material application equipment and their route (driving the route and noting obstacles along the route).
- iv. Have a 50 % of the fleet ready to respond to a winter event.
- v. Have sufficient staff available to operate the fleet if conditions warrant a winter event response.

8.3 At the Start of the Winter Season

At the start of the winter season the Municipality of Bayham will:

- i. Implement the winter shift schedule.
- ii. Begin patrolling representative roads in all maintenance classes.
- iii. Respond to winter events as per the winter operations plan.

Section 9 - Winter Patrol

During the winter maintenance season, the Corporation of the Municipality of Bayham carries out a winter patrol on a route of representative roads, as per Appendix 'D' twice daily, seven days a week. Between winter events a patrol of representative roads will occur during daylight hours and a second night patrol will be also be scheduled. The purpose of the patrol is to monitor and record weather and road conditions and mobilize winter maintenance operators and equipment should a winter event be observed and a winter event response is required. On the approach of a winter event or during a winter event the route of representative roads may be modified, insofar as reasonably practicable, depending on the type and severity of winter event or the direction from which the storm approaches.

Section 10 – Operations

The Corporation of the Municipality of Bayham adheres to the hours of service as set out in the [Highway Traffic Act, Ontario Regulation 555/06](#).

10.1 Winter Materials Used Annually

Table 6

Material	5 Year Average
Rock salt (NaCl)	1200 tonnes
Sand and salt mix*	2200 tonnes
Salt brine (NaCl)	30000 Liters

* Percentage of salt in sand/salt mix by weight 10%

10.2 Facilities

The Municipality provides winter maintenance services from the patrol yard listed below. The patrol yard has a front-end loader capable of loading the winter maintenance fleet with sand or salt.

Municipality of Bayham Public Works Yard
8354 Plank Rd
Bayham, ON

Equipment Storage Details: Nine bay pre-engineered steel building with a partially paved lot. There is enough room in the bays to store 4 tandems, a loader, a grader, and the vac trailer. During winter months most of the equipment is stored indoors and seasonal equipment such as roadside grass cutters are stored at a different facility.

Material Storage Details: All granular road construction material is stored outside. Salt and sand is stored within the storage dome as outlined with the [County of Elgin Salt Management Plan](#).

10.3 Communications

All winter maintenance vehicles are equipped with two-way communications (radios, cell phone, etc.). Municipal staff is responsible for reporting changing winter weather and/or road conditions as the changes are observed.

Spectrum Communications provides a call centre which serves as the main hub for in/outgoing calls from staff, emergency services and the general public.

The Call Center: Can be reached by calling 519-866-5521 and is manned by Spectrum Communications outside normal business hours.

The Municipality of Bayham communicates important information to the public via the municipal website www.bayham.on.ca

10.4 Authority

Operational decisions will be made by the Manager of Public Works or designate with the aid of available forecasting, level of service policy, patrolling etc. However, it should be emphasized that decisions will be subjective and external input, whether in this plan or elsewhere, merely acts as an aid in determining if a call out of staff and equipment by the Manager of Public Works or designate.

Section 11 - Decommissioning Winter Operations

After the winter season expires, the Corporation of the Municipality of Bayham ceases all winter highway maintenance operations and decommissions the remainder of the equipment providing weather forecasts warrant the decommissioning.

Section 12 - Training

The Corporation of the Municipality of Bayham provides winter operations training for all staff involved in the delivery of winter services. It is compulsory for the municipal staff to attend the training sessions.

Current Winter Operations Trainings:

- i. Equipment Circle Check
- ii. Equipment Calibration Record Keeping
- iii. Health & Safety
- iv. Winter Operations

Section 13 - Record Keeping

Full and accurate completion of documentation, according to the applicable procedures, ensures that the Municipality is protected from liability by providing solid due diligence that procedures have been followed.

Staff, or the on-board data collection system, is responsible for keeping the following records:

- i. CVOR Time Card
- ii. Materials Used
- iii. Route Plowed
- iv. Winter Patrol Diary
- v. Weather/RWIS Information
- vi. Equipment Calibration Records

Section 14 - Monitoring and Updating

The purpose of monitoring and updating is to provide a basis for continuous improvement of the Municipality of Bayham Winter Operations Plan and the winter maintenance policies, practices and procedures of the Corporation of the Municipality of Bayham.

The current winter maintenance policies, practices and procedures form the baseline or benchmark upon which improvements can be made to improve winter operations and/or the use and management of road salt in the future.

The Corporation of the Municipality of Bayham plans to undertake continual improvements to ensure the most efficient and effective winter operations.

At the end of the winter season, a meeting to review winter operations will be held with all winter operations staff to itemize all issues that arose during the winter season and discuss how these issues may be resolved.

Prior to the start of the next winter season and with sufficient lead time to implement any changes, the Corporation of the Municipality of Bayham will train staff on the changes to equipment and/or winter maintenance policies, practices, and procedures.

Year over year performance measures will be used to determine whether the objectives of the Municipality of Bayham Winter Operations Plan and/or winter maintenance policies, practices, and procedures have been met and to identify areas for improvement.

i. Monitoring the salt used:

- Percentage change (+/-) in the total tonnes of salt purchased annually from the benchmark year
- Percentage of applications where discharge rates exceeded
- Percentage change (+/-) in the total tonnes of salt applied annually per system km per winter event

