

July 28, 2021

Circulation Control

Planning and Development

Sent via email to: cpag.circ@calgary.ca

Re File Number: LOC2021-0067; Seton Ridge Outline Plan & Land Use Redesignation

Thank you for circulating our organization regarding this file and providing us the opportunity to respond with comments on this proposed Outline Plan and Land Use Redesignation for the proposed new community of Seton Ridge within the Ricardo Ranch Area Structure Plan.

We were not able to consult in great detail with our members and associates about this file, but on an initial review we have the following comments about this proposal:

1. Significant Flood Risk

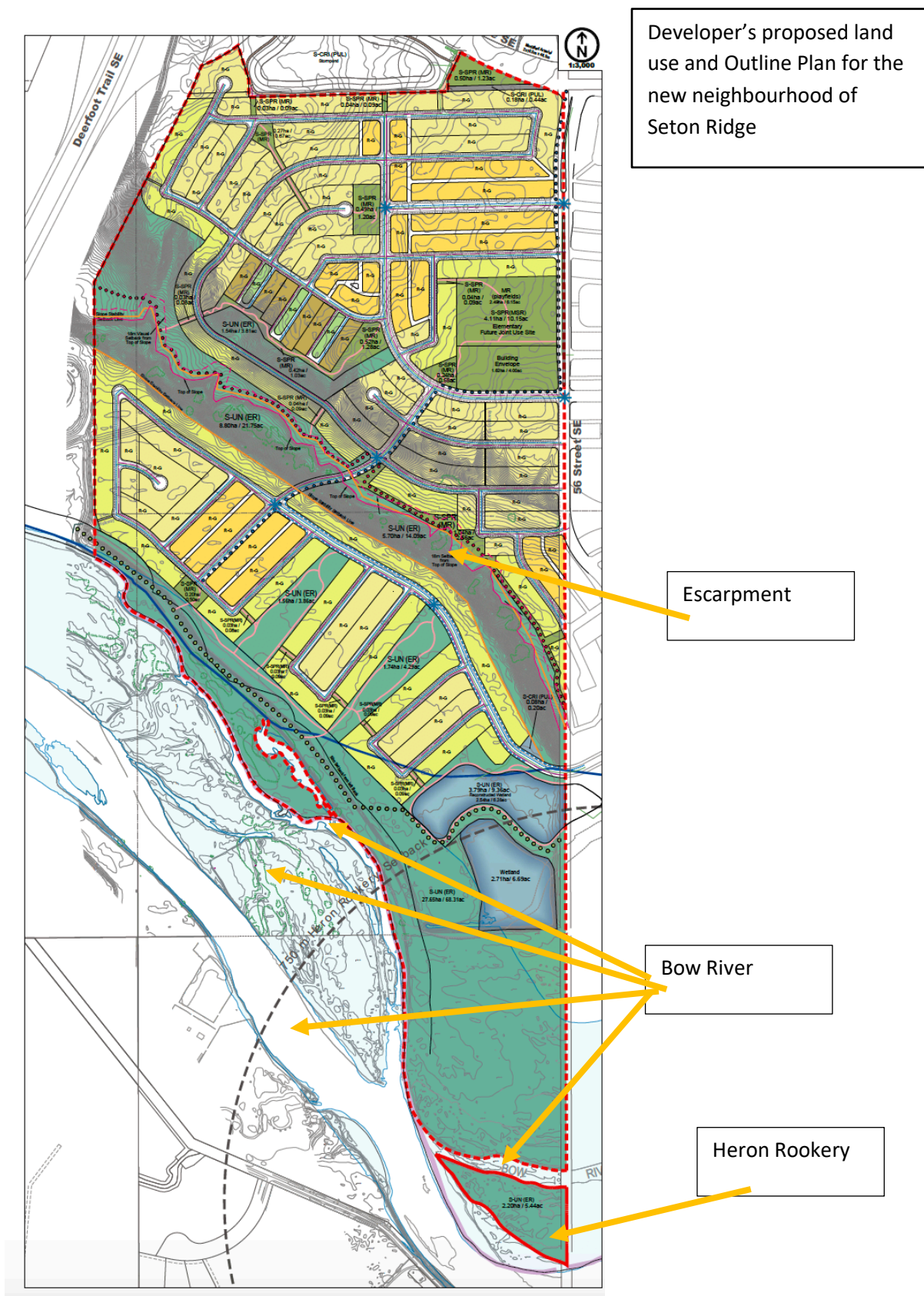
The information available to us suggests much of the proposed development is within the 1 in 100 flood risk zone, as evidenced by the overlay of the Government of Alberta Flood Inundation Maps (source: https://floods.alberta.ca/?app_code=FI&mapType=Draft) on the developer's residential zoning map. See next pages for details. The information we have reviewed suggests most homes and roads proposed for the lower benchlands area below the escarpment have been identified as at risk of flood inundation with what is considered a 1 in 5 event flood of the Bow River.

The Ricardo Ranch Area Structure Plan Ecological Inventory 2018 states (page 20), that in addition to flood water from the Bow River, this type of flat, valley bottom land "will also receive run off during times of heavy rainfall from the valley slopes to the north." It further identifies in Figure 4.0 that the entire lower benchlands are classified as either Floodway or Flood Fringe lands.

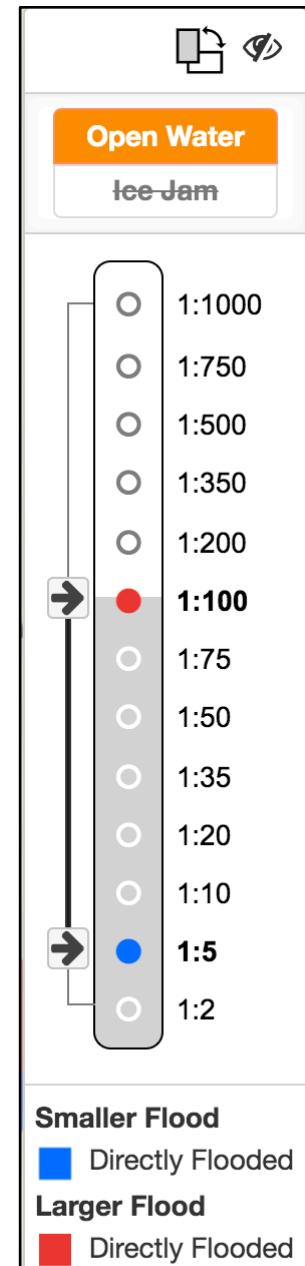
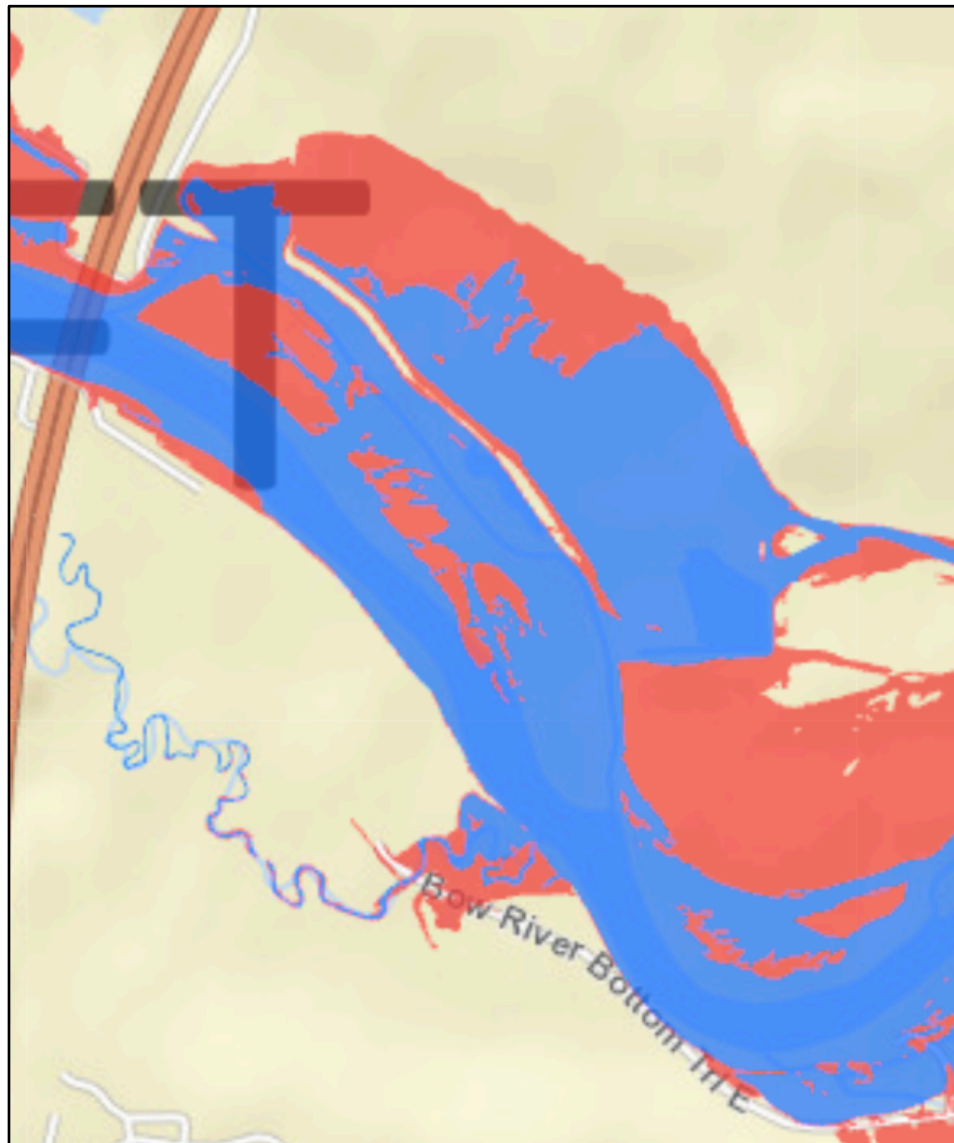
To develop these lands would put both the future residents and the taxpayers of Calgary and Alberta at risk when these lands flood in the future. We believe the City should seriously consider whether any development should occur within the lands below the escarpment; this floodplain area should be considered to be part of the river, and the river should be allowed to have access to its floodplain.

Calgary River Valleys is concerned with what appears to be the expectation that we can continue to build in the floodplain, which triggers future costs to taxpayers in upstream flood mitigation and flood reparations, as well as irrevocable changes to the river ecosystem and its functionalities.



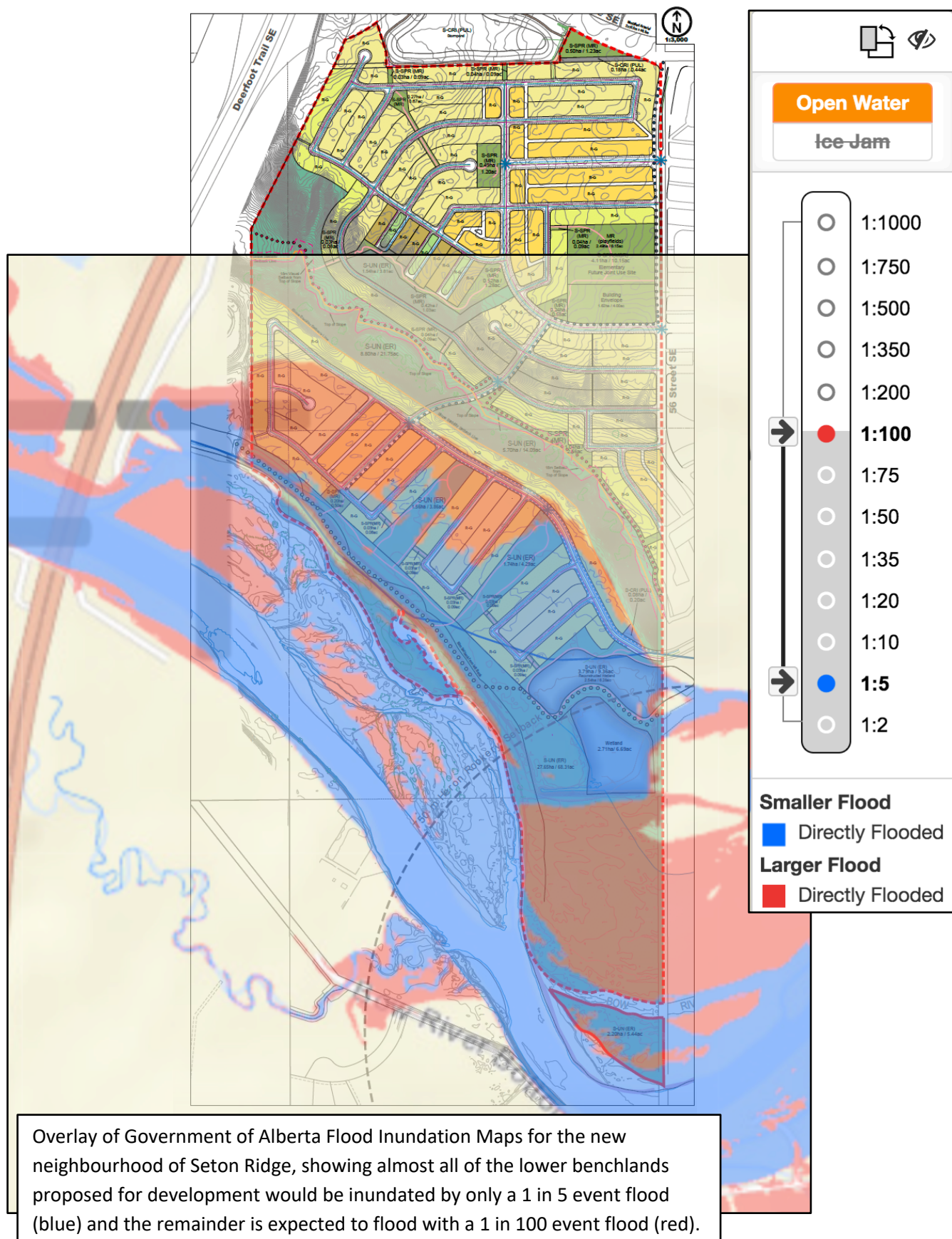


Government of Alberta Flood Inundation Maps for the new neighbourhood of Seton Ridge, with a range of 1 in 5 event flood (blue) to 1 in 100 event flood (red): https://floods.alberta.ca/?app_code=FI&mapType=Draft



Flood Range Maps

Flood range maps compare two different sized floods and help communicate what parts of a community can become at risk as flows change during a flood event.



2. Proposal appears to be contrary to Policies of the Calgary Municipal Development Plan (2020)

Calgary's Municipal Development Plan (2020) states on page 43:

"Calgary's most prominent natural open spaces are on its ridges and hilltops and along its creeks and riverfronts within the river valley system. The City is committed to protecting the value and quality of these assets and will strive to sustain them while ensuring they remain accessible for the enjoyment and outdoor pursuits of all."

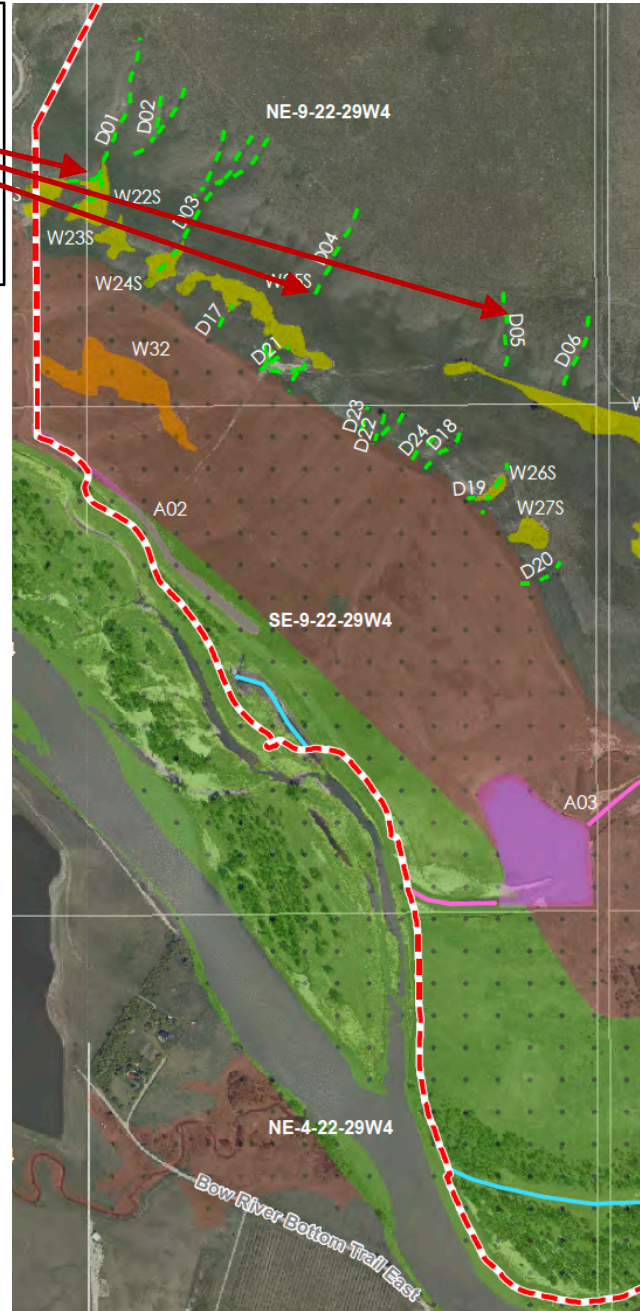
Dashed green lines indicate the watercourses along the escarpment that were noted in the 2018 Ecological Inventory for this area.

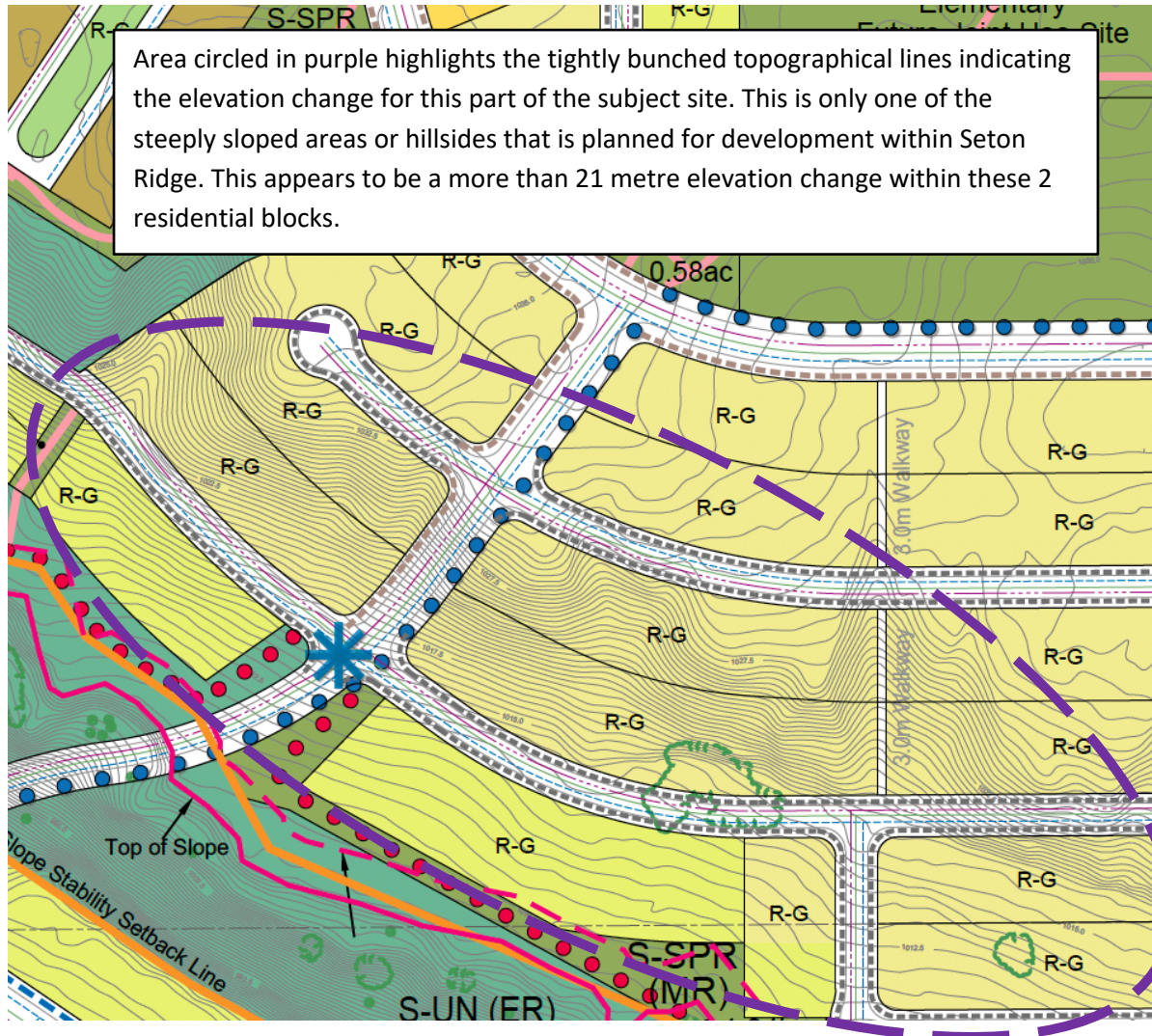
The irregular yellow and orange shapes downslope of these watercourses are the wetlands they support.

The Ricardo Ranch Area Structure Plan Ecological Inventory (2018) noted multiple drainage courses (Figure 4.0, page 28) including seeps and springs that flow from the top of the escarpment downslope to provide water to wetlands and the valley bottom. If these drainage courses are destroyed or put into pipes to accommodate residential development, the wetlands below will be denied the water they need to support their unique vegetation, and these sensitive habitats will be irrevocably changed. Denying water to the vegetation that grows on the slopes would alter the green infrastructure (deep-rooted vegetation) that helps prevent erosion of the steep slopes in this area.

The Ricardo Ranch Area Structure Plan Ecological Inventory (2018) stated these wetlands not only had a "seasonal permanency", they also "receive additional hydrological input from groundwater sources that is more consistent than precipitation alone" (page 35). This indicates the watercourses are connected to the water regime which flows through the geological layers and are fed by springs coming from underground.

This Outline Plan proposes to build low density mixed housing not just along the top of the natural ridge, but also well down the natural escarpment, which would more severely disrupt and destroy these watercourses and the delicate ecosystem they support downslope. See graphic next page.





In addition, the lands at the bottom of the escarpment and adjacent to the Bow River are the riparian zone and floodplain of the river. As per Calgary's Municipal Development Plan (2020), **Protecting Aquatic and Riparian Habitats** section k on page 74, the City of Calgary's stated policy is to:

"Protect riparian areas to meet habitat, water quality and public access through environmental reserve dedications and design alternatives."

The City of Calgary has invested significant resources into protecting and restoring riparian areas near Calgary's rivers and creeks. We believe this proposal, as it is currently configured, does not support the City of Calgary's goals of protecting the aquatic and riparian habitats.

Summary

It is our position that approving this Land Use Amendment and Outline Plan without significant changes will irrevocably alter the natural flow of watercourses that drain to the Bow River valley and

that provide source water to the wetlands and riparian zone at the base of the escarpment adjacent to the river.

In addition, if no significant changes are made to this Land Use Amendment and Outline Plan, it would pose an unacceptable risk to the lives and properties of the future residents of this area, as well as the built infrastructure that will become the responsibility of the City of Calgary, such as roads and pathways.

We are concerned that development proposals such as this and similar ones are leading taxpayers to subsidize and protect river-adjacent properties and are leading to further degradation of natural watercourses. This type of development also can lead to the call for damming our rivers upstream to protect downstream at-risk developments.

We would appreciate the opportunity to discuss our concerns about LOC2021-0067 in more detail with you. Feel free to contact us by email to CalgaryRiverValleys2@outlook.com or by phone at 403-268-4632.

Sincerely,

Bill Morrison, President
Calgary River Valleys

Cc: CRV Board & Circulation
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