

SLOW THE BOW

BOWNNESS **R**ESPONSIBLE **F**LOOD **M**ITIGATION SOCIETY



IPC Meeting

Response to Recommendations for Development in Flood Hazard Zones - April 15, 2026

BRFM Introduction – Who We Are

- Created as an Alberta Society in 2018 after the City issued the Flood Measures Mitigation Assessment (FMMA) Report
- Consists of a 12 member Board and about 300 members who live mostly in the greater Bowness area but include people across the city.
- Our objective is to advocate for effective flood mitigation against both overland and groundwater flooding
- We advocate for a reduced flow rate through the City through upstream protection like the TransAlta Agreement, and additional upstream dam capacity
- We thank the City for performing a third party ground water study in 2021 which affirmed our belief and observations that ground water levels during a 1:100 flood event would impact the vast majority of the flood fringe

Our Position on the proposed Bylaws

- Some of the proposals put untenable or unreasonable restrictions on existing homes. Examples:

Max increase in footprint of 0% for HHFF, 0% for FF but no limit for PFF, GWFF

The limitation of living spaces below the 1:100 (Designated Flood Elevation, DFE) for HHFF and FF is too far reaching for existing properties. Appears one cannot add a bedroom to a partially unfinished basement even though there is one there already as that would be an increase in “occupied space”

“How building design rules apply to existing development. Existing buildings can remain as they are, but new changes cannot increase flood risk by adding more living space or new suites “

Adding a second storey requires removing all doors and windows in the basement or main floor if any are below the DFE-1M

Cannot alter grade in the HHFF, when the City itself in 2014 built up the bank on the East side of the Bow river, narrowing the river channel

Our Position on the proposed Bylaws

- Bylaws impacting property owners should be done equitably, for example why would a property which will have their basement flooded by groundwater be allowed basement living spaces?
- Proposals and feedback: The City did not provide a suite of questions with different scenarios. For instance a question like: Should a property owner with a small (700 sq ft) bungalow be able to build a new 1200 sq ft bungalow? was never asked even though feedback was provided to use an absolute sq footage number for allowable footprint
- The use of “Safety” as the rationale provides no objective criteria. Safety is a spectrum with a balance that must be chosen. Where one picks that balance point should consider the homeowners interests and be equitable across different types of flooding(HHFF, FF, GWFF). It should be defensible in terms of impact when compared to alternatives, and the decision making on the alternatives should be documented

Our Position on the proposed Bylaws

- The proposed bylaws need to be vetted. For example, the new definition of “occupied space” includes basements:

13(96.1)	<p>“occupied space” includes all areas of a building that are:</p> <p>(a) used for dwelling or business including, but not limited to:</p> <ul style="list-style-type: none">(i) bedrooms;(ii) living areas;(iii) kitchens;(iv) basements; and
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“Dwelling” is not defined in the bylaw but is likely in this context refers to context single detached, duplex ...

“Building Footprint” is not defined nor proposed to be defined even though it is being proposed to be part of the regulations

13. (96.1) is already a used as a subsection: “**96.1 "Officer"** means a Bylaw Enforcement Officer or a Peace Officer.”

- The proposed bylaw stipulates there can be no “occupied spaces” below the DFE in HHFF, FF. This then means there can be no basements below the DFE. This has never been communicated to the public that we are aware of

(6)	<p>In the river flood area, buildings must be designed with the following flood mitigation measures:</p> <p>(a) in the floodway, high hazard flood fringe or flood fringe, a building must:</p> <ul style="list-style-type: none">(i) be designed to prevent structural damage from floodwater, as demonstrated by a note on the plans by a qualified professional;(ii) have the main floor entirely above the designated flood elevation;(iii) have all occupied space and Secondary Suites be located above the designated flood elevation;
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Our Requests

- Direct administration to consult with key affected HHFF homeowners one on one as to the impact on their homes.
- Require the City to meet the same test as expropriation for these bylaw changes: fair, sound and reasonably necessary, and for the rationale to be provided in context to alternatives. i.e. what is the impact in measurable terms between allowing 0% increase in footprint vs 25%
- Direct administration to disclose the different scenarios which were run to determine “safety”, the parameters used, assumptions made, and resulting outputs.
- Ask for the City to advocate for the province to build upstream mitigation

Thank you