April 15, 2026

Delivered by Email

City of Calgary
P.O. Box 2100, Station “M”
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**Re: Item 7.3 Flood Resilience Land Use Bylaw Amendments, IP2026-0212**

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Dear Chair and Members of Infrastructure and Planning Committee,

On behalf of BILD Calgary Region, thank you for the opportunity to provide feedback on the proposed amendments to Land Use Bylaw 1P2007.

We would also like to acknowledge and thank Administration for their work in advancing these amendments, and in particular the efforts of Sarah Marshall, Team Lead, Climate Adaptation Integration and Sandra Davis, Leader, River Engineering, for their engagement with industry and openness to work through technical and implementation considerations.

Industry supports the intent of these amendments. Aligning land use regulations with updated provincial flood hazard mapping, groundwater risk mapping, and significant flood mitigation investments made across Calgary is an important and necessary step toward improving public safety and long-term resilience in Calgary’s river communities.

However, members have identified a key concern related to potential interpretation and implementation inconsistencies across the regulatory framework, particularly regarding Flood Fringe areas and the interaction between policy language, mapping, and external decision-making.

1. **Policy Context and Interpretation Considerations**

   The proposed amendments to Land Use Bylaw 1P2007 establish a clear risk-based framework for development in flood hazard areas, supported by associated mapping and design standards. Industry supports this approach.

   Members have also raised practical questions regarding how the new flood hazard sub-categories are applied operationally in different development contexts, how those distinctions are consistently communicated through approvals and external interpretation, and whether these classifications will, in practice, support or constrain development in affected areas.

   At the same time, there is concern that flood hazard terminology across related policy language and implementation materials may be interpreted inconsistently, particularly in relation to Flood Fringe

areas. While the Land Use Bylaw enables regulated development in Flood Fringe areas subject to mitigation, related language may be interpreted as suggesting such development is not permitted.

This creates a risk of inconsistent interpretation across internal review, applicant submissions, and external parties.

Industry supports the City's intent to:

- restrict or prohibit development in the floodway and high hazard flood fringe; and
- enable appropriately mitigated development within Flood Fringe and Protected Flood Fringe areas.

Clear and consistent application of this distinction across policy, mapping, and implementation guidance will be important.

Given that the Land Use Bylaw and River Flood Maps guide development decisions, inconsistent interpretation may affect:

- the ability to deliver appropriately mitigated development in Flood Fringe areas;
- consistency in application; and
- certainty for housing and infrastructure planning.

**2. Implementation Clarity and Tools**

Industry supports the proposed interactive mapping tool, guidebook, and staff training program. These tools will be critical to ensuring consistent application of the new regulations.

To be effective, they must provide:

- clear, parcel-level identification of flood hazard areas and Designated Flood Elevations; and
- practical guidance for larger, phased, or master-planned developments where site-specific interpretation is required.

Early rollout and consistent application will be important during the transition period.

**3. Financing, Insurance, and Market Interpretation**

Industry also acknowledges the significant technical work undertaken to advance updated flood hazard mapping and supporting modelling. Consideration is also being given to how updated flood hazard designations will be interpreted by financial institutions, insurers, and the broader market. Even where development is permitted under the proposed regulations, inclusion within the flood-hazard areas may affect financing availability and lending conditions, insurance coverage and premiums, and purchaser confidence and marketability.

While the provincial flood hazard mapping underlying the City's updated flood maps was published in 2025, the terrain data used in flood modelling can change over time as land is regraded and developed. These evolving site conditions may not be immediately reflected in mapped designations, creating a timing lag between current conditions and the information used for planning, financing, insurance, and market decisions. As with all flood modelling, outputs are based on underlying terrain and hydraulic assumptions that evolve over time.

As a result, decisions by financial institutions, insurers, and purchasers may not always reflect current on-the-ground conditions or completed mitigation measures. Industry encourages The City to work with the province and relevant parties to support consistent understanding of actual risk and to mitigate unintended impacts on housing affordability and development viability.

**4. Mapping Transition and Timing Lag**

As provincial mapping updates and implementation proceed through a formal process, there will be a transition period during which mapping data, policy interpretation, and market responses may not be fully aligned with current site conditions or completed mitigation measures.

This timing gap may extend the period in which mapped hazard datasets continue to influence planning, financing, insurance, and market decisions.

Industry is committed to working with Administration to support identification of affected projects and coordinated implementation where clarification may be required.

**Conclusion**

Calgary's development industry remains committed to working with Administration to support safe, resilient, and well-planned communities.

With clear alignment across regulatory intent, mapping, and implementation tools, these amendments can achieve their public safety objectives while maintaining certainty for housing delivery and investment.

We look forward to continuing to work collaboratively as this work advances.

Respectfully submitted,

Brian R. Hahn
Chief Executive Officer
BILD Calgary Region