

Monday, April 20, 2009

Re: Carp River Third Party Review

Dear Carol,

After a brief review of the Carp River Third Party Review documents, as well as the set commenting period, I am troubled with what I find.

Firstly, how does the City realistically expect residents to participate in this process if the report which is rather technical and difficult to read, is allocated an extremely short commenting period, with no reason given for the rush.

There have already been too many miscalculations, unwarranted floodplain filling approvals and serious flooding incidents in Kanata, that have dearly cost individual homeowners as well as the taxpayers in general, to justify proceeding in the rather careless manner exhibited by the TPR report.

For the considerable amount of \$300,000 that this report has cost us as residents, it is unconscionable that the TPR report should contain so many omissions, inherent contradictions and inconsistencies. It is difficult to name all of them in such a brief commenting period, but here are a few examples.

1. The obvious error in modelling discovered by a city expert last year (extensively reported in the media), which largely contributed to the TPR being ordered in the first place, has been (re)confirmed, but not corrected. From Table 3.6 apparently from about Hazeldean Road to Palladium Drive flood levels will rise nearly 0.2-0.3m, potentially flooding the Sensplex, SMART Technologies and other properties.

2. While the TPR report asserts that the "overall flood storage volume in the Carp River corridor will increase with the proposed restoration plan" (Conclusion #10, page 80) there is no sound evidence that this increase is to be achieved within the constraints of maintaining flood levels to within present (already unsatisfactory) levels or improved lower levels. On the contrary, as mentioned above, it appears that the storage volume increase will come at the cost of heightened flooding risks, about which the Greenland experts have chosen to be silent.

3. One of the major omissions from the model revealed last year was the exclusion of pending developments from the calculations. Apparently this also has not changed in the report, as e.g. the run-off from the Fernbank lands (pp. 102-103) do not seem to have been adequately included. It is stated (page 53) that:

"The worst case scenario **excluding the Fernbank lands** modelled in future development conditions would result in somewhere between 982,386 m³ and 1,155,101 m³ of flood volume stored in the system", and

"Early evaluation of potential runoff volume increases from the future Fernbank development could increase this potential deficit by an additional 29,000 m³ to 40,000 m³" (page 54).

On the same page, the TPR report admits to a lack of calibration based on actual monitored events:

"The purpose of this exercise is to show, without formal model calibration with additional monitored events...!"

Is this, like, additional to ZERO monitored events???

It will be more than ironical, if an owner of a flooded household were to be told by these experts that it's really not a flood, because (one of) our uncalibrated engineered models says there is probably no flooding, so sit back and enjoy life.

4. Further on the calibration issue, on page 77 the TPR report states

"The concern is that there may be SEVERAL YEARS before there are sufficient flow events monitored in order to further validate the hydrologic and hydraulic models as identified in the proposed implementation plan."

To any logical person, this would imply recommending a hold on all permits and approvals for filling and development in the general area of the floodplain until the missing vital information is gathered and processed. So, on what basis do the experts come to Conclusion #9 and to recommend that the "15 Class EA projects that were not issued a Part II Order request are not impacted by the modelling changes" (page 81)?

Any engineer who has been seriously involved with modelling will tell you, that a model is only as reliable and accurate as the data that is being fed into it.

Well, who is going to feed the model(s) with something more than conjecture?

The expert consultants appear to be so preoccupied with a wide diversity of hydrology models (XPSWMM, DDSWMM, Qualhymo, SWMHymo, HEC-RAS), even demanding a city staff increase (one "master" overseer), that they have overlooked the dismal lack of hard data to feed all these models. One is left to wonder whether invoking so many models arises from a misapprehension caused by the absence of a true and thorough understanding of the Carp river system or simply an intent to discombobulate the public.

5. Conspicuous by its absence in the report is any critical evaluation of the outdated Carp River flood plain and what should be done about updating it. The section 3.2 "City Official Plan Implications" state inter alia that the "extent of the one in 100-year flood will be determined by consulting flood plain maps prepared by the Mississippi Valley ... Conservation Authorities and, in conjunction with the Conservation Authorities, by considering other information such as land surveys and engineering drawings that may be pertinent."

Well, was an expensive report required to regurgitate an already known requirement? In view of the unacceptable situation mentioned on page 90: "Flood plain mapping for

the Carp River and Poole Creek was prepared in 1983 and 1989 respectively. This mapping does not reflect development features that have occurred since then adjacent to the floodplain", would it not be appropriate to call for an audit of the MVCA, including, but not confined to, the handling of flood plain fill applications, possible lack of diligence and even negligence in failing to maintain updated records and appropriately adjusting flood plain mapping particularly crucial to an area of active development.

6. In conclusion, it would appear that a report with so many obvious deficiencies should not be accepted without further more thorough investigation of the Carp River flood plain as essential. A close scrutiny of the MVCA should also form a part of the TPR, particularly regarding the exhibited level of diligence (or lack thereof) when providing input to the planning and approvals process.

City staff is urged to review this report critically and without bias so that an escalation of the planning fiasco in the Carp River can be avoided, thereby improving the quality of all residents in the area and saving all of Ottawa taxpayers additional unwarranted legal costs in the future.

Looking forward to a responsible and comprehensive report from you to Council,

M. Svilans