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October 6, 2017

Attention: GROW Consultation
Box 11, 200 Saulteaux Crescent
Winnipeg, MB R3J 3W3
Via email: watershedconsult@gov.mb.ca

To Whom It May Concern,

On behalf of the Association of Manitoba Municipalities (AMM), which represents all of Manitoba's 137 municipalities, I would like to take this opportunity to provide some comments in regards to the provincial government's public consultation document entitled *GRowing Outcomes in Watersheds* (GROW).

As water management affects all municipalities, AMM members overwhelmingly support improvements to water management and water quality in Manitoba's lakes and waterways. Moreover, the AMM has long advocated for a made-in-Manitoba Ecological Goods and Services policy based on the Alternative Land Use Services (ALUS) model since municipalities are front line stewards of the environment that have invested considerably in flood mitigation infrastructure.

The AMM appreciates the voluntary nature of GROW, while its implementation will be driven by local communities and responsive to local priorities. However, the AMM recommends consideration be given to linking municipal investments in flood mitigation infrastructure with small water retention projects under the proposed priority eligible Beneficial Management Practices (BMPs). Increased investment in adaptation and climate-resilient infrastructure will certainly help avoid damages in the future.

In Manitoba, effective water management and watershed programming demand financial support and incentives from the Province of Manitoba so that any new processes can be properly implemented and fully observed in practice. For instance, if Conservation Districts (watershed authorities) are expected to fulfill any new role or additional responsibilities to help deliver GROW, increased operating funding for Conservation Districts must be provided by the provincial government. Therefore, more consultation is needed about integrating funding from multiple sources as costs and responsibilities must not be downloaded to municipalities. Greater clarity regarding how funding will be applied to specific projects is also warranted, while regulations should not be implemented without accompanying provincial funding.





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Lastly, as the Province of Manitoba intends to implement an evidence-based project evaluation framework to prioritize funding toward provincial outcomes, it is essential that application and reporting requirements are streamlined, efficient, and transparent. The AMM is committed to identifying red tape barriers and sharing practical ideas to streamline provincial government processes to benefit Manitoba municipalities, particularly to help municipalities apply for provincial grant funding or undertake drainage-related works.

In closing, thank you again for the opportunity to provide these comments and we look forward to being further consulted on GROW as it progresses.

Sincerely,

A handwritten signature in blue ink that reads "Joe Masi". The signature is written in a cursive, flowing style.

Joe Masi
Executive Director

