



May 24, 2012

Surface Water Management Strategy
Attention: Rhonda Dyck-Pankratz
Manitoba Conservation and Water Stewardship
Box 11, 200 Saulteaux Crescent
Winnipeg, MB R3J 3W3

Dear Ms. Dyck-Pankratz:

On behalf of the Association of Manitoba Municipalities, I would like to provide comments in response to the Surface Water Management Questionnaire discussed at the April 3, 2012 Water Summit in Winnipeg.

The top three concerns as expressed by the AMM membership with respect to Surface Water Management are: flood protection, an efficient and timely drainage process, and support for Conservation Districts.

For Questions 1 and 2, please see the attached speaking notes that were used for AMM's response during the Water Summit.

Question 3 refers to drought preparation in Manitoba. In terms of preparing for a prolonged drought, an assessment of drought-prone areas and vulnerabilities would help individual communities to better prepare. Planning and forecasting should be the first step, with specific measures to address risks in an area. As well, incentives for water storage would alleviate the severity of a drought. A water conservation strategy would be helpful for drought preparation, as well as to encourage more sustainable use of water and energy.

Question 4 refers to surface water management actions to address the implications of climate change. Government assistance for municipalities would help them to assess their risks and vulnerabilities, and determine how to mitigate effects of climate change locally. This would allow these communities to better protect their infrastructure from different kinds of extreme weather events. In addition, water storage is another measure that can be used to mitigate the effects of extreme weather. LIDAR is also a key tool for flood plain mapping.

Question 5 refers to wetlands, whose preservation achieves a variety of water-related goals. Not only do they reduce flooding, they also improve surface and groundwater quality and biodiversity. The AMM supports wetland tax credits to provide incentives for landowners to keep wetlands, and improved enforcement of drainage legislation to prevent further losses of wetlands.

Integrating an Ecological Goods and Services (EG&S) policy with land use policies could help to develop trade-offs between maintaining the environmental benefits of wetlands with the economic advantages of drainage. A combination of methods will likely be necessary to stop drainage of wetlands. There should be both preservation and incentive aspects, which may require stronger, adaptable legislation. As well, the terms and pricing for conservation agreements should be reviewed to ensure they are realistic.

Question 6 refers to water quality, which is an issue for many water bodies in Manitoba. The AMM believes no one solution can protect and improve water quality in Manitoba's lakes and rivers, however public education should be one component. The AMM believes a one-size fits all solution for a particular industry is not necessarily the most effective solution.

Question 7 refers to drinking water source protection, which is an issue many municipalities are connected with as owners of water utilities. The AMM supports the recent introduction of new measures to improve groundwater quality and ensure sustainable management of aquifers. However, many municipalities have concerns about the cost of water treatment facility upgrades to meet new government regulations. There are other challenges for growing municipalities, who must ensure they have enough capacity in their treatment plants and lagoons.

Question 8 refers to shoreline and riparian protection, which is necessary to prevent excessive shoreline erosion. Many municipalities have identified the importance of shoreline and riparian areas for flood protection, and the need for a more coordinated approach.

Question 9 refers to terminal water bodies, and how the issue of high water should be dealt with. This may be a water management issue in some areas, while in other it would be best dealt with as a land use issue, depending on the specifics of the situation.

Question 10 refers to water use and allocation. The AMM feels the current focus on sustainability and economic development is appropriate, although we have heard some concerns from southwestern municipalities who are affected by oil industry activity.

May 24, 2012

3

The use of fresh water by the oil industry should be carefully monitored to ensure the environment is not negatively affected.

Question 11 refers to governance at a watershed scale. The AMM agrees that some functions of land use planning could be improved if realigned on a watershed basis. In terms of governance, this may be more difficult to realign based on administrative realities and funding arrangements.

The AMM appreciates the opportunity to these comments, and we look forward to meeting with the Province to further discuss the development of the Surface Water Management Strategy. Should you have any questions or concerns, please do not hesitate to contact our office.

Sincerely,



Joe Masi
Executive Director

Enclosure

cc: Wayne Hildebrand, Manitoba Conservation and Water Stewardship

AMM Speaking notes for Water Summit Discussion Questions

Question 1:

The first issue arising from this question is that provincial drains are not currently operating at capacity. These drains are the outlets. Before we even consider upgrading the system, the province needs to properly maintain and clean their drains.

It is also important to consider that different areas of Manitoba differ geographically. Measures to upgrade drainage need to be tailored to the landscape in each region.

The required maintenance has to be factored in as well, otherwise the upgrades won't have the intended effect. Without regular cleaning and maintenance, the potential grows for things like washouts.

The user pay model could be a good option. In some cases a drainage project can stall if no agreement can be reached over who will do downstream maintenance.

The second part of the question asks about new tools and resources, and the AMM has identified several.

- First, municipalities need resources to access GPS and other technology to help them measure elevations and determine the direction the water will flow.
- Resources are also needed to clean out provincial drains to get them working at their designed capacity.
- Resources need to be focused in regions of Manitoba where there is less provincial drainage infrastructure and fewer existing drainage options due to the landscape.
- It is important for municipalities to be informed when water is being released in other municipalities.
- Conservation Districts need to be more directly involved in drainage.
- And finally, tools and resources need to recognize the geographical characteristics in different regions of Manitoba. Some areas have less capacity to store water or divert water to natural water bodies.

Question 2:

This question asks whether the Province should consider limiting development in designated flood prone areas. The AMM believes the Province should be careful limiting development because flooding is unpredictable.

Nor does the AMM feel developers should be expected to cover all flood protection costs. Rather, we believe the Province should be more proactive to protect flood prone areas.

For instance, in the past there were dyking programs where the province paid a portion of the cost, so we think any prescribed flood protection should be cost-shared between developers and the Province along similar lines.

In terms of flood protection, there needs to be better coordination between the Province of Manitoba and the governments of North Dakota and Saskatchewan. Since watersheds cross these jurisdictions, they need to be involved to make sure Manitoba's flood protection is effective.

You've asked about flood protection standards as they might relate to climate change. The AMM feels there needs to be more clarification of the impact of climate change to be able to answer this part of the question.

In order to determine flood protection levels and new lake levels there should be better coordination between the Province and municipalities. In order to design appropriate flood protection standards, we need to be able to understand the potential impact and magnitude of extreme events both here in Manitoba and in other jurisdictions.

Every community will need help from the Province to identify weaknesses for different types of extreme weather scenarios. Across the province, different geographical regions have different vulnerabilities.

We think it is important to consider each region's vulnerability in addition to looking at the existing standards for flood protection.