

MEMBER ADVISORY



February 11th, 2008

Municipalities need to have voices heard at regional meetings at end of February

The AMM Board of Directors feels it is critical that municipalities attend the regional meetings at the end of February to have their voices heard on the future direction of conservation districts in Manitoba and Manitoba Water Stewardship's recently released *Framework for the Future – Conservation District Program Discussion Document*. We encourage all municipalities to send 2 representatives to one of these regional meetings:

Monday, February 25, 2008	Thursday February 28, 2008	Friday February 29, 2008
9:30 a.m. – 12:00 p.m. Banquet Hall - Parkland Recreation Complex 200 First Street South East Dauphin, Manitoba	9:30 a.m. – 12:00 p.m. Assiniboia Downs 3975 Portage, Avenue Winnipeg, Manitoba	9:30 a.m. – 12:00 p.m. Victoria Inn 3550 Victoria Avenue Brandon, Manitoba

We also ask that municipalities take the time to submit written comments on the document, rather than completing the questionnaire that accompanies the document. We strongly believe this questionnaire does not call attention to the real issues, and want municipalities to make sure their voice is heard.

We have had requests from several municipalities for a list of the AMM's concerns relating to this Provincial document. We have included a summary of these concerns on the following pages. If you wish to use these as a guide at the regional meetings please feel free. And if you have additional concerns we encourage you to make these known as well.

The AMM met with Minister Melnick last week to express some of our general concerns, and while some of our initial concerns with the limited window for consultation were resolved, additional concerns remain. (For a recap of the meeting with Minister Melnick, please see the AMM Bulletin from February 11th, 2008).

The future direction of conservation districts has major impacts for municipal governments and we encourage all municipalities to take the time to have their voice heard on this very important issue.

If you have any questions about the process or any of the AMM's concerns, please do not hesitate to contact AMM Director of Policy and Communications Tyler MacAfee – tmacafee@amm.mb.ca or 204-856-6876.

AMM GENERAL ISSUES

AMM concerns with **funding** in general:

- The recently released document is alarming in that it only raises more questions about ‘who pays.’
- Conservation districts (CDs) have become the delivery mechanism of choice for water initiatives in Manitoba, however the funding for CDs has never been equal to the expectations placed on them.
- This document advocates a scenario where the Province provides little additional funding, while increasing the expectations for CDs.
- Municipalities certainly agree with the Province on the high level goals and visions laid out so far. However it is how the Province is looking to move forward in arriving at these goals that has raised concerns for municipalities.

AMM concerns with the **erosion of local authority**:

- One of the greatest strengths of CDs is that they are locally driven, with boards comprised of local residents making decisions based on local priorities. However there is real concern that the proposed changes to the funding mechanisms will seriously erode the importance of local priorities, ultimately leading to the erosion of local authority.
- By linking limited Provincial funding with Provincial priorities, it takes away a local CD’s ability to use Provincial funding for locally decided priorities. By being forced to use the vast majority of their budget on Provincially directed initiatives, there will be nothing left to deal with local priorities. While we certainly expect there to be similarities between Provincial and CD priorities, any flexibility in addressing local priorities will be lost.

AMM concerns with the **consultation process**:

- The approach taken by the department in trying to gain feedback on the document. We believe the questionnaire is misleading in that it does not deal with the fundamental issues at stake, instead focusing on the very general goal statements.

AMM SPECIFIC CONCERNS

GOAL 1 – CDS WILL BE FORMED ON WATERSHEDS THROUGHOUT MANITOBA

- It is critical that municipal participation in CDs remains voluntary.
- *The Conservation Districts Act* needs to be reviewed to clarify the link between land and water management.

GOAL 2 – CDS WILL BE GOVERNED BY LOCAL BOARDS THAT ENCOURAGE AND PROVIDE OPPORTUNITY FOR CITIZEN CONSULTATION AND MEANINGFUL PARTICIPATION IN DECISION-MAKING PROCESSES

- This framework is very prescriptive throughout and local decision-making processes may be reduced to a minimum. There is a concern that the Province has defined what is important for water resources and municipalities must pay for it.
- We are concerned that seats on the CD board are for sale, making it difficult to define what is an appropriate interest and local priority. Interest groups that provide funding will demand that their interests take priority.
- Municipalities are accountable to voters, unlike other possible board members, which raises questions regarding accountability and which interests take precedence.
- Watershed planning already trumps land use planning (since *The Water Protection Act* trumps *The Planning Act*), which creates concerns that other stakeholders are guiding the process with no consideration of municipal land use planning.
- There is potential for huge downloading to municipalities since this direction makes municipalities responsible for seeking outside funding sources, as Provincial funding is insufficient to meet new mandated responsibilities.
- Urban municipalities need to be included in this process.

- Concerns that municipalities will now be spending more time fixing Provincial infrastructure (that they will never own) than is spent on their own infrastructure.
- Concern for gradual withdrawal of funding if CDs become highly reliant on outside sources.
- CD funding is not keeping pace with programming, even if budgets have not been cut to date.
- Some CDs will lose funding under the proposed funding formula.

GOAL 3 – CDs WILL COMPLETE AN INTEGRATED WATERSHED MANAGEMENT PLAN (IWMP)

- The need for IWMPs to conform to Provincial priorities will not allow municipalities to pursue local priorities.
- The cost of implementing IWMPs is prohibitive. The total CD program budget of \$4.835 million is insufficient to even cover the projected cost of Phase 1 of the Watershed Plan for the East Souris River Watershed.
- The Province is clear that IWMPs are “Not intended to demand additional provincial resources and budgets,” but it should also be clear that these should not demand additional municipal resources and budgets.
- If the focus moves to solely Provincial priorities, as we expect to be the case under this design, there is concern that existing programming may suffer as a result.

GOAL 4 – ALL SOURCES OF DRINKING WATER WITHIN A CD ARE PROTECTED

- There needs to be an explanation of at what costs? and who pays?
- There is a much greater role for the Provincial Government than is detailed in this document.
- The language is too prescriptive and should follow the Provincial Land Use Policies, which are more like guidelines.

GOAL 5 – CDs WILL HAVE THE APPROPRIATE AUTHORITY AND RESPONSIBILITY FOR WATER MANAGEMENT WITHIN THEIR WATERSHEDS IN ACCORDANCE WITH PROVINCIAL POLICY AND LEGISLATION

- Municipalities are expected to take on greater responsibilities without any enforcement mechanism to ensure compliance.
- Municipalities will need technical support.
- Infrastructure funding should be separate from programming funding.

GOAL 6 – CD PROGRAMMING WILL SUPPORT INITIATIVES THAT IMPROVE AND PROTECT AQUATIC ECOSYSTEMS

- This is something CDs currently do and should do more than this.

GOAL 7 – CDs WILL SUPPORT SUSTAINABLE LAND USE AND WATER MANAGEMENT THROUGH INCENTIVE PROGRAMMING

- Concerns with an erosion of local authority. This has serious impacts for land use planning if Province sets priorities and dictates those priorities to municipalities through CDs, especially when funding is linked to Provincial priorities.
- The link between land use and water planning needs to be better addressed.
- There is a focus on sustainable land use, but the definition of this will likely be constantly changing depending on who is on the board.

GOAL 8 – CD PROGRAMMING WILL DEMONSTRATE MEASURABLE IMPROVEMENT TO WATERSHED HEALTH

- There is a need to identify measurement indicators, which may be helped with the use of available Federal Government data.
- Municipalities are being asked to take on a disproportionate role in funding the clean up of the environment.
- Many of the beneficial things CDs do cannot be quantified and could be lost (i.e. abandoned well capping program).