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October 6, 2017

Attention: Drainage Consultation  
Box 11, 200 Saulteaux Crescent  
Winnipeg, MB R3J 3W3  
Via email: [watershedconsult@gov.mb.ca](mailto: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 *Watershed-Based Drainage and Water Resource Management*.

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 welcomes the provincial government's recognition of existing red tape in the current drainage application process and corresponding reporting requirements while our organization is committed to identifying red tape barriers and sharing practical ideas to streamline provincial government processes to benefit Manitoba municipalities.

The AMM fully supports the idea of simplifying the registration process through a proposed 14-business day registration period whereby an applicant (i.e., municipality) may proceed with their drainage project unless otherwise contacted by the department. If changes are being contemplated to the fees associated with the project registration process, it must be matched by improved and guaranteed response times from provincial officials.

Reducing time delays caused by provincial process inefficiencies should also help prevent added financial or staff resources when municipalities deal with provincial Acts, regulations, license requirements, and permit applications. Municipal frustrations with the current drainage licensing process are well-documented, particularly since cumbersome surveying and engineering requirements as well as inconsistent enforcement and information sharing by local Water Resource Officers featured prominently in our comprehensive submission to the Red Tape Reduction Task Force in March 2017.





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In regards to tile drainage, we encourage the Province of Manitoba to consult directly with municipalities who already have by-laws and licensing requirements in place as they are aware of the benefits and realities on the ground in their local jurisdictions. In keeping with the provincial government's commitment to reduce red tape, provincial requirements should be minimal and easy to understand, while final decisions should be left to municipalities.

In closing, thank you again for the opportunity to provide these brief comments and we look forward to being further consulted on this issue 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

