



December 17, 2014

Towards Sustainable Drainage Consultation
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**AMM Submission Re:
Towards Sustainable Drainage - A Proposed New Regulatory Approach**

On behalf of the Association of Manitoba Municipalities (AMM) I would like to provide some comments regarding Manitoba's New Approach to Drainage Regulation consultation document, released in June 2014.

The AMM feels the proposed risk-based approach will help to address delays in obtaining licences as well as the need for increased enforcement. For AMM members, the most important aspects of the new drainage regulation and licensing process is for it to be clear, responsive, better enforced, and for it to fit within the context of the provincial Surface Water Management Strategy, all of which are goals outlined in the "Towards Sustainable Drainage" document.

We believe the fees proposed in the consultation document are reasonable, with a proposed nominal fee of \$100 to register a plan of drainage and water projects that fall within the six classes and a fee of \$1,000 for more complex projects. As well, the plan to increase penalties for illegal drainage should help to deter illegal drainage, which can be very harmful to downstream landowners and municipalities.

Municipal responsibilities to maintain their own municipal drainage works mean that a number of municipalities have requested information be circulated for their comments if there are any local Water Rights Licence requests that have the potential to impact municipal drains and infrastructure. While the AMM recognizes one of the purposes of the new regulation is to streamline licence approvals, it is important to keep communication open between municipalities and Water Resource Officers if municipal drainage infrastructure might be affected.

As well, our members have passed a number of resolutions supporting improved water quality in Manitoba's lakes and waterways, ecological goods and services, and programs that supply wetland restoration credits. As a result, the AMM supports the goal of no-net loss of wetland benefits, and a move to a watershed-based regulatory planning framework within a reasonable period of time. We encourage the Province of Manitoba to develop mechanisms to restore and retain wetland benefits based on programs that have been shown to be successful in the past such as Alternative Land Use Services, and that allow enough flexibility to work with landowners.

Additionally, emerging technology such as tile drainage is becoming more commonly used by Manitoba landowners where conditions allow, and municipalities need guidance from the Province of Manitoba to be able to continue to manage their own drainage infrastructure and prevent any downstream landowners from being negatively affected. It is important for both provincial and municipal staff and decision makers to understand this technology for the sake of water management on a larger scale, and for the sake of individual landowners who could potentially be affected.

The AMM is pleased that Manitoba Conservation and Water Stewardship has already sought specific feedback from municipalities throughout different regions of the province. It is especially important to give each region to opportunity to provide informed comments about the new proposed approach, as some may have considerations particular to the local watershed and topography. Similarly, organizations such as Conservation Districts will also have different experiences based on local characteristics that should be taken into account.

The AMM looks forward to the implementation of the new drainage regulations, and hopes to see a process that can be adjusted if necessary once its implications can be fully observed in practice.

Sincerely,



Joe Masi
Executive Director