

March 5th, 2010

**Honourable Christine Melnick
Minister of Water Stewardship
314 Legislative Building
450 Broadway
Winnipeg, MB
R3C 0V8**

**Patrick Watson
Watershed Planner
Manitoba Water Stewardship
Watershed Planning and Programs
Unit B - 284 Reimer Ave,
Steinbach, MB.
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Dear Minister Melnick, Mr. Watson

**Re: Manitoba Wildlands Comments on 2009 Draft Southeast Regional
Groundwater Management Plan (Manitoba Water Stewardship).**

Manitoba Wildlands is providing comments on *The Draft Southeast Regional Groundwater Management Plan (SRGMP)*. We are available to assist with updates and improvements based on our review comments.

First, Manitoba Wildlands was not a participant in the creation of this plan.

To date, we have received materials, but have had no resources to participate. We suggest Manitoba Water Stewardship consider the wide variance in capacity to participate, and risk to validity of this groundwater planning process that results. Our estimation is that those participating in meetings were able to do so as part of their paid employment. We request immediate clarification as to the listing of 'agencies' in the plan document, and confirmation that Manitoba Wildlands will not be listed as an agency or participant for this plan.

Public Registry

Posting this plan on the SRGMP website does not constitute posting it in a public registry. The plan must be made available on the Manitoba public registry, with all documentation (<http://www.gov.mb.ca/conservation/library/registry.html>) to make it fully available to the public. The official paper public registry should also contain these documents. The change in the structure of the government departments should not result in deterioration in public registry standards.

Page 4 of the SRGMP states four advertised open houses occurred between January 21 and April 21st of 2008. Additionally, the SRGMP states that four open houses were presented in January of 2010 (when SRGMP itself was published December 24th, 2009). The draft SRGMP should address the following questions: What were previous suggestions from the public and civil society? Where can they be found? How were they addressed? We note that weather caused cancellation of one of these January open houses. The detailed information for both sets of open houses should also be included in public registries.

Limiting capacity to participate while also limiting public posting regarding this planning process is in open contradiction to the COSDI report recommendations, which have repeatedly been cited as policy of the Manitoba government. We would observe that this planning process does not meet the standards for the relatively recent Manitoba Water Strategy. Nor is there any clear policy context for the SRGMP.

Overall, the SRGMP lacks detail and planning specifics for groundwater systems in South-Eastern Manitoba. Data used in creation of maps, methodologies and sources of data cited in the plan should be made available to allow for review of this information. At minimum, the location and contact information of the organizations responsible for ground water conservation and monitoring should be listed, and *their activity* for monitoring and conservation of groundwater be made available. None of this information is available in the SRGMP or on the SRGMP webpages. We expected to see appendices to provide access, and information about the policy and regulatory framework for this region's groundwater, plus more information (data for certain maps) about tenure and water use.

Policy and Procedures for Aquifer Plans – Manitoba Government

Currently, it is not clear if there is a regulatory standard or method for aquifer plans in Manitoba. Also, there are no references to the mandate or terms of reference for the SRGMP planning process. These guidelines should be publicly available, in advance of

the process, and included in the plan itself. Manitoba Wildlands requests a copy of the SRGMP guidelines be forwarded to our offices, in addition to being posted on public registries. Any policy and procedures used by the department in water planning process should be included.

Plan Structure

The SRGMP website, *the closest thing to a public mandate or referral*, states: *“The final outcome of the process will be a Management Plan that identifies management issues related to the groundwater resource, management actions and strategies to address those issues and a process for plan implementation that will guide the sustainable development of these resources for the next 10+ years.”* (We note lack of assessment or evaluation by the department for the plan.)

This outcome for the SGWMP is *NOT* addressed in the plan. There are no details provided regarding: process of implementation, timelines the plan will be implemented, or strategies or actions to take place. This plan is not comprehensive. Most of the contents are what would be located in a technical annex to a ground water plan. *This concern was identified by the Ecological People in Action (EcoPIA) and Manitoba Wildlands agrees.*

The goal of this SRGMP document is to identify major ground water management issues, but few are spelled out– those included have no detail. Information which should be in this document includes:

- What guidelines were used to create this plan? Where can they be found?
- Science and technical details regarding implementation of the SRGMP, such as scientific data collection, timelines for data collection, how this information will be used
- Plan methodology, survey data or meta data
- Policies and procedures for aquifer plan
- Regulatory framework for the SRGMP
- Historic and current water draws on the aquifer with projections
- Relationship of SRGMP to the Manitoba Water Strategy and other water policies.
- Report back standards, evaluation criteria, and timelines for measuring the deliver of the ‘plan’

Currently, this document is mostly a review of existing information/ status report regarding aquifer systems in south-eastern Manitoba. The document could easily be considered a technical guide for participants in aquifer planning. EcoPIA suggested this

document should contain concrete management recommendations, with timelines, and suggested restrictions of activities known to be potential threats to groundwater, such as large scale livestock operations. Manitoba Wildlands agrees with EcoPIA and calls for SRGMP to take these steps for the final plan. We were not able to locate plan contents regarding current regulations, and zoning for ILOs for the region.

In addition, Manitoba Wildlands urges the Southeast Regional Groundwater Management Planning Group to include peer technical review of future aquifer planning documents, a point also highlighted by EcoPIA.

Conservation and Climate Change

Currently, the SRGMP contains no discussion regarding strategies for conservation or responsible use of water resources. These strategies and existing Manitoba policy should at minimum be acknowledged. Also, it should be acknowledged that ground water is a non-renewable resource, and should be treated accordingly.

The SRGMP contains no reference or strategy in reference to Climate Change, *The Manitoba Climate Change Strategy* from 2008, or the *Manitoba Climate Change Act*. This point is also raised by EcoPIA. *Manitoba and Climate Change: Investing in our Future* notes water conservation is key to future resource management in light of climate change. Reference to influence of climate change and the corresponding legislation must be considered and acknowledged when finalizing this aquifer plan.

Sustainable Development

Page 24 of the SRGMP states:

“Planning for groundwater development, as with most natural resources, is done in concert with the development of the resource. It would be nice to completely define the magnitude and replenishment rate of a resource before beginning development according to an established, sustainable plan. However this approach is incompatible with societies’ interests in resource and economic development because the required study is expensive and would delay development considerably.”

Sustainable planning and management of natural resources is *not* a conflict with societal interests and must be the foremost concern when creating a long term aquifer management plan. This point is also raised by EcoPIA. This perspective needs to be adjusted in order to reflect the importance of sustainable use of resources, such as groundwater and aquifer systems. We would like to know whether or not the Principles and Guidelines for Sustainable Development in Manitoba were applied to this process,

and the contents of the plan. While it may be a surprise to some involved with the SGWMP, society at large and Manitobans are concerned about water quality, how use decisions are made, and protecting our aquifers.

The SRGMP frequently references the term “sustainable yield”, and yet there is no definition of sustainable yield nor reference to the principles of sustainable development. Again, when creating a plan centered around the use of resources, these principles and ideas are crucial to long term, sustainable planning.

The 2010 Manitoba Sustainable Development Report is currently due under the Sustainable Development Act of the Province of Manitoba. This is an opportunity to clarify actions on aquifer and watershed planning in the province.

Basic information about this aquifer and its ground water – *which is not renewable* – has to be the basis for both the process to arrive at a plan, and applying the plan. So what was the resource capacity 50 years ago for this aquifer and what is it now? What is the projected use or draw down for the aquifer based on current licenses and uses?

Our office and staff are available to respond to questions or assist in actions to fulfill recommendations in this review comments letter.

Yours truly



Gaile Whelan Enns,
Director
Manitoba Wildlands.