



January 28, 2009

Ms. Brenda Seward  
Pembina River Integrated Watershed Project Management Team  
Pembina Valley Conservation District  
Manitou, MB R0G 1G0

Fax: (204) 242-3281  
E-mail: pvcd@goinet.ca

Dear Ms. Seward,

Thank you for your letter of December 11, 2008 requesting input from the Manitoba Cattle Producers Association into the development of an Integrated Watershed Management Plan for the Pembina River Watershed.

As frontline conservationists and stewards of the land for many generations, cattle producers play a unique role with respect to the issues of water management and conservation in Manitoba. MCPA's membership forms one of the single largest groups of landholders outside of the Crown in the province, and our members have developed extensive experiential knowledge on water-related issues. MCPA thus very much appreciates this opportunity to contribute our membership's views and recommendations regarding an IWMP for the Pembina River Watershed.

#### **Recommended Goals/Objectives for an IWMP**

From our members' perspective as multi-generational stewards of the land, MCPA believes that a successful IWMP needs to have *five central goals and objectives* as follows.

1. IWMPs must have as a primary goal the task of ensuring *an adequate supply of potable drinking water for domestic use* by human populations in the region.

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2. Given the relative economic importance of agricultural production in the Pembina Valley River Watershed Area, and to the province in general, an IWMP must also have as a primary goal the task of ensuring *a continued supply (in quantity and quality) of both surface water and groundwater for the purpose of sustainable agricultural production* in the region.
3. IWMPs must have as a goal the task of ensuring a sufficient supply of surface water and groundwater to maintain a healthy ecosystem in the region for the purpose of sustaining local animal/plant habitat and biodiversity.

In order to accomplish the above three goals,

4. IWMPs need to set as a leading objective the continued supply of vital perennial natural capital through the availability of grazing areas (pasture, natural grassland, other rangelands) and wetlands. It is these instances of natural capital that provide the essential environmental benefits with respect to water management (point sources, natural water retention & flow management, nutrient interception/cycling, etc.) that will allow the first three goals to be achieved.

And finally, subject to a sufficient supply of surface and groundwater being available *after* meeting the first four priorities above,

5. IWMPs should provide for careful and closely monitored use of surface water and groundwater for the purpose of other economic activities in the region. The IWMP must also closely examine the impact of any future activities designed to withdraw surface or groundwater from the region for distribution outside of the region.

### **Agri-Environmental Policy with respect to IWMPs**

In order to be successful in meeting the above agenda and priorities, an IWMP will need to be developed in the context of a pro-active agri-environmental policy framework that encourages and rewards sustainable agricultural activities such as cattle production.

Such an agri-environmental policy framework has the following criteria:

1. All present and future policies and regulations around water management have sound, peer-reviewed science as their basis rather than uninformed public perceptions.
2. Policies within an IWMP need to be tied to an adequate and on-going research component that continually gathers reliable scientific data on regional water use, quality, and the role of regional natural capital.
3. Policies that clearly address the mischaracterization that all forms of agricultural activity have an equal and inherent impact on an ecosystem. The diversity found within

agricultural production means that different farm practices and activities will have a different relationship between agriculture and the environment.

4. Policies that recognize that economic conditions in agriculture have today reached the point at which there is now no longer enough profitability left to have producers absorb further regulatory cost as part of their farm operation. This means that implementing policy around an IWMP will need to occur in the form of incentives rather than cost-inducing regulations.

### **Identifying the Positive Contribution of Cattle Production within an IWMP**

Cattle production, because of its inherent ability to provide an on-going supply of natural capital such as grasslands, forages, and wetlands, is a form of sustainable agriculture that significantly enhances the region's ability to meet IWMP goals.

Far from having a net negative impact in terms of the environment, the land use decision by Manitoba cattle producers to keep large tracts of the Canadian Prairie under perennial cover for the purpose of grazing ensures that regional landscapes can continue to intercept and cycle nutrient within the watershed. In many cases, grazing areas serve as essential local point sources for the recharge of aquifers and surface streams, and thus ensuring the continued supply of an adequate volume of water in the watershed in addition to minimizing the release of nutrient into waterways and minimizing the export of nutrient. Further, the same perennial landscapes provided by the typical cattle producer's grazing land provides essential habitat for many species at risk in the province.

The bottom line is that the continued presence of cattle production on the regional landscape is the leading reason behind the continued preservation of the natural capital necessary for good water stewardship in Manitoba. It is the cattle industry which provides the necessary land use balance within agricultural Manitoba. Thus, it is essential that the proposed IWMP for the Pembina River Watershed encourage rather than limit the practice of cattle production on the regional landscape.

### **Suggested Tools for Promoting the Supply of Vital Water-Related Natural Capital**

Given what has been said above, it is clear that the proposed IWMP consider recommending and utilizing policy tools that will encourage the continued delivery of essential natural capital in the region through the cattle industry.

MCPA therefore includes for your Project Management Team's consideration a copy of our most recent proposal to the Province of Manitoba regarding an ecological goods and services incentive system in agricultural Manitoba. Also enclosed is a copy of a recent presentation that MCPA gave to Manitoba Conservation regarding this proposal plus a copy of a letter of support from Ducks Unlimited Canada.

MCPA strongly urges the Pembina River Integrated Watershed Project Management Team to take this proposal into consideration when drafting its Integrated Watershed Management Plan.

Once again, thank you for your invitation for input into the development of an IWMP for the Pembina River Watershed. I hope that the comments and materials provided here will be of use to the Management Team. If you feel that MCPA can be of any further help in your efforts, please do not hesitate to call or write us.

Yours sincerely,



Joe Bouchard  
President, Manitoba Cattle Producers Association