



*Saskatchewan Farm Stewardship Association*

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The New Approach to Agricultural Water Management - Phase I is a progressive step forward to fulfilling the commitments of the 25 Year Saskatchewan Water Security Plan. The amount of time, mediations and consultations held to develop and implement Phase I to date is appreciated and commendable.

The core of the new regulations is based on responsible agricultural water management where it is the producers' responsibility to design, construct, operate and permit the drainage works within an efficient and risk-based regulatory system to minimize negative impacts. The negative impacts are stated within the regulations as follows:

- . Local to large-scale downstream flooding and infrastructure damage;
- . Degraded water quality from erosion and increased contaminants; and
- . Negative impacts on wetlands and beds and shores of other water bodies and watercourses.

In a recent discussion with Water Security Agency, the main topic was surface water management by producers and the direct benefits it provides for effective flood control. We continue to support this concept and will promote it vigorously to our SaskFSA members and fellow producers.

There are however other factors, besides agricultural drainage, that affect flood control equally that should be considered for integration into the 25 Year Saskatchewan Water Security Plan:

**1. HABITAT LAND**

Land left in a completely natural state – habitat land in fill and spill areas adjacent to agricultural land. If these habitat land areas were able to be managed with the use of control structures, at appropriate times, would create capacity for the next surge of water as opposed to the 100% uncontrolled discharge spilling when they are completely full. Habitat land should be managed as well.

**2. NATURALLY DRAINED LAND**

Naturally drained lands adjacent to or included in agricultural land, given the same rainfall and same water table, discharge an equivalent amount of water as producer drained lands. In the naturally drained land there are areas where control structures are out of the question, but there are also areas where control structures are completely feasible. Naturally drained land should be managed as well.

There is a theory circulating that the 'fill and spill' areas are the ultimate in flood control. When rainfall and water tables are low these fill and spill areas are very effective in flood mitigation, as are properly managed drainage projects. However, during prolonged periods of excessive rainfall and high water tables, the fill and spill areas fail as a retention strategy and the properly managed drainage projects continue to be an effective tool in flood mitigation. There are many local areas where this situation is a proven reality.



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A concern that SaskFSA has expressed with WSA, is that if flood control is primarily the responsibility of producers in the prairie pothole region (PPR) constructing approved drainage works that the process will fail. On a large scale, the results of these localized projects alone will not alleviate our downstream neighbor's (Manitoba and North Dakota) concerns. Unfortunately the blame will once again be placed on the producers implementing proper surface water management practices when in fact those producers contribute a small percentage of the water moving into Manitoba. The producers closest to the Manitoba and Saskatchewan border are, by default, bearing the blame.

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This issue is not the sole responsibility of the PPR producers and SaskFSA is asking for the ***PROVINCIAL PLAN TO BE EXPANDED TO INCLUDE ALL STAKEHOLDERS UPSTREAM***. Anyone who has water on their land, whether it be shedding rainfall, a conservation area or agricultural drainage, is responsible for the water and collectively we can work towards a plan for managing its impact during peak flows.

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*SaskFSA encourages our government to consider this while further developing and implementing the next phase of the 25 Year Saskatchewan Water Security Plan.*

Sincerely,



David Zerr . President &

Candace Mitschke-Hiller . Executive Director & Communications

On behalf of the SaskFSA Board & Membership