



May 31, 2018

The Honourable Marc Garneau
Minister of Transport
House of Commons
Ottawa, Ontario
Canada K1A 0A6

Dear Minister Garneau:

The Western Canadian Municipal Associations (WCMA) recently convened its annual meeting to discuss municipal issues of shared concern. The WCMA consists of the Alberta Urban Municipalities Association (AUMA), the Rural Municipalities Alberta (RMA), the Saskatchewan Association of Rural Municipalities (SARM), the Saskatchewan Urban Municipalities Association (SUMA), and the Association of Manitoba Municipalities (AMM). We wish to provide an update on our shared perspectives regarding the proposed *Canadian Navigable Waters Act*.

The WCMA requests more information on the Indigenous traditional knowledge of the proposed legislation. We are also seeking clarification on how municipal concerns will be addressed by the proposed amendments. A teleconference was held between members of the WCMA and Transport Canada department officials on April 13, 2018. The information provided was not overly positive for municipalities. It appears that the new legislation will include a broadening out, beyond the scope of the legislation prior to 2012, and these changes will have significant administrative impacts on municipal infrastructure projects.

The duty to consult and notification requirements of project proponents will increase administrative costs for municipalities. There is also concern that more municipal infrastructure projects will likely fall under federal review; therefore, likely delaying projects and increasing costs.

The new category of projects that are in-between "minor" and "major works" is also an area of concern. Questions remain on what projects this will include, what the requirements will be and who determines this? Clarification would be appreciated and the WCMA would welcome the opportunity to provide input on this process.

Thank you for your consideration of our comments and we look forward to working together on these issues.

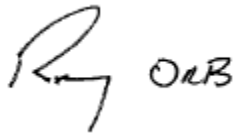
Sincerely,

A handwritten signature in black ink, appearing to read 'Al Kemmere'.

Al Kemmere
President, RMA

A handwritten signature in black ink, appearing to read 'Barry Morishita'.

Barry Morishita
President, AUMA

A handwritten signature in black ink, appearing to read 'Ray Orb'.

Ray Orb
President, SARM

A handwritten signature in blue ink, appearing to read 'Gordon Barnhart'.

Gordon Barnhart
President, SUMA

A handwritten signature in black ink, appearing to read 'Chris Goertzen'.

Chris Goertzen
President, AMM

cc: Federation of Canadian Municipalities