



CATFISH CREEK CONSERVATION AUTHORITY
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June 18, 2021

Liz Mikel
Conservation and Source Protection Branch
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Re: Catfish Creek Conservation Authority Comments on the Regulatory proposals (Phase 1) under the Conservation Authorities Act. ERO number: 019-2986

Dear Liz,

Thank you for the opportunity to provide comments on the “Regulatory proposals (Phase 1) under the Conservation Authorities Act. ERO number: 019-2986”.

Catfish Creek Conservation Authority (CCCA) is a small rural Conservation Authority located in South West Ontario with a jurisdiction size of 490 Square Kilometers and 5 Member Municipalities. Comments submitted by Catfish Creek Conservation Authority should not be construed as limiting any comments submitted by Member municipalities, Conservation Ontario or other Conservation Authorities.

The Catfish Creek Conservation Authority comments regarding the regulations proposed as part of the are organized into four sections as follows:

1. **Mandatory programs** and services that conservation authorities would be required to provide, including core watershed-based resource management strategies.
2. **Non-Mandatory Programs and Services** that conservation authorities will be required to have agreements with municipalities to fund non-mandatory programs and services with Municipal Levy including a transition plan to support the preparation of municipal agreement
3. The consolidation of each of the current individual conservation authority ‘Conservation Areas’ regulations made under **Section 29** of the Conservation Authorities Act into one Minister’s regulation.
4. Requirements for each conservation authority to establish a **Community Advisory Board** to provide advice to the conservation authority.

1. Mandatory programs and services that conservation authorities would be required to provide, including core watershed-based resource management strategies.

CCCA reviewed its 2021 budget and supporting 2021 programs and services guide to determine the financial impact of the proposed changes. In 2021, there was over \$200,000 shortfall to deliver the mandatory programs and services as defined in 2021. The amount is determined based on the intent of the *Conservation Authorities Act* to be a 50/50 cost share between the Province and participating municipalities. This works out to a Total Mandatory Program Cost of \$483,405.29 / 2 (50/50 cost share between Province and Municipalities) = \$241,702.65 minus the MNRF transfer payment of \$41,214.50 which equals a \$200,500 funding shortfall. CCCA makes up the shortfall in municipal and provincial funding using self-generated revenue to the expense of the maintenance of the campgrounds and properties which is an unsustainable business model.

With the proposed changes, CCCA's shortfall will increase to over \$236,000 due to several programs and services currently deemed non-mandatory by CCCA being considered mandatory (Resource Management Strategy, Water Quality Monitoring, Administration of CCCA properties for non-recreational purposes). The updated mandatory program cost includes programs previously funded through self-generated revenue including:

1. Water Management Programs = \$15,660.32
2. Other CA Lands (natural heritage, ecology, passive recreation) = \$55,567.50
3. Information & Education (mandatory components estimated at \$20,000)

The proposal increases the CCCA Total Mandatory Program Cost as follows: 2020 Total Mandatory Program Cost of \$554,633.11 / 2 (50/50 cost share between Province and Municipalities) = \$277,316.55 minus the MNRF transfer payment of \$41,214.50 which will result in a \$236,000 funding shortfall.

With the original Provincial funding formula of 85% provincial funding to 15% Municipal funding mechanism for small Conservation Authorities like CCCA, the calculation works out to a Provincial funding shortfall of \$400,223.64. This is calculated from a Total Mandatory Program Cost of \$554,633.11 / 85% cost shared by Province and 15% by Municipalities) = \$471,438.14 minus the MNRF transfer payment of \$41,214.50 which results in over \$430,223.64 funding shortfall.

The long-standing funding partnership (under Section 39 of the *Conservation Authorities Act*) between CCCA and the Province saw a funding cut of about 50% in 2019 further decreasing the amount of surplus self-generated revenue available to support the shortfall in Provincial funding to deliver mandatory programs, and further decreasing the amount of surplus revenue to go back into the business area that generated the revenue. It is important to keep the revenue generating side of the business functioning well by ensuring asset maintenance and capital costs for Conservation Lands are funded from the largest portion possible from the surplus revenue.

CCCA is concerned about the negative feedback and loss of municipal support that will be received by Member Municipalities when an increase in levy is implemented to support the array of newly eligible mandatory programs and services. It is the hope of CCCA the Province will financially support the CCCA in their efforts to focus on the Core Mandate, as well as communicate the new requirements to the Municipalities. CCCA proposes the full suite of mandatory programs and services do not need to be provided wholly depending on local issues and more importantly local capacity. However, in the case of shared Conservation Authority jurisdictions, local capacity and available funds needs to be balanced with the need to provide all services (consistent) to a particular shared municipality.

Details of a minimum levy need to be communicated as soon as possible to Municipalities in order to assist with the 2022 budget process which is currently under development.

Mandatory Program #1 of 6: Natural Hazards

The definition of natural hazard should be expanded to include wetlands and other programs such as tree planting that support flood mitigation since CCCA anticipates more intense storm events in the future.

Existing funding programs such as the Water Erosion Control Infrastructure (WECI) are not adequately funded, nor proportionate for smaller Conservation Authorities like Catfish Creek. A minimum set amount annually such as \$10,000 would ensure maintenance of the Catfish Creek Conservation Authority's water control and erosion structures.

Catfish Creek Conservation Authority supports the inclusion of Ice Management and needs to be flexible for municipality and Catfish Creek Conservation Authority to share costs such as ice specific forecasting, request for proposal for equipment rental, administration of the request for proposal process, and subsequent contract management for seasonal ice management operations.

Catfish Creek Conservation Authority supports the inclusion of Low Water Response contingent on provincial funding. Catfish Creek Conservation Authority were advised by the Province (MNRF) on March 25, 2021 that they monitor conditions "provincially also, and confirmed that MNRF has not allocated any funding for the Ontario Low Water Response program in fiscal 2021/22". The email concluded by indicating "We appreciate the value CAs add to the implementation of this voluntary program and understand if Catfish Creek Conservation Authority chooses not to participate". The Catfish Creek Conservation Authority OLWR program costs a minimum of \$8,000 per year to fund. Should Provincial Funding not be provided for the OLWR Program, it should be optional (not required) to fund via Municipal levy.

Catfish Creek Conservation Authority supports the delineation and mapping of hazard areas. However, a timeline should not be associated with this requirement unless Provincial funding is provided to support watershed wide updated mapping of Natural Hazards.

Catfish Creek Conservation Authority supports inclusion of Communications related to Natural Hazards as mandatory. Communications has never been included in the funding formula for

Flood Forecasting and Warning and was funded from self-generated revenue in the past. It is estimated that the natural hazards communications work from 2020 at the Catfish Creek Conservation Authority totaled \$20,000 and was funded through self-generated revenue. Examples of the work include videos explaining the program and role of CCCA with a focus on natural risks. Social media channels are used to provide educational/safety related posts for the community, in particular around riverine flood and ice jam seasons. In the future, expansion of automated notifications should be considered as part of the mandatory communications as this relates to the core mandate of protecting people from flood and erosion. Catfish Creek Conservation Authority also provides flooding and water monitoring information in the Watershed Education Programs for students and clarity should be provided whether this type of communication is mandatory or not.

Mandatory Program #2 of 6: CA Lands

Catfish Creek Conservation Authority supports the consolidation of each of the current individual conservation authority 'Conservation Areas' regulations made under Section 29 of the Conservation Authorities Act into one Minister's regulation. Specific comments on the Mandatory programs related to Conservation Lands are as follows:

Administration of the Section 29 Regulation

The Conservation Lands Supervisor (Dusty Underhill, CCCA Provincial Offences Officer #102) at the Catfish Creek Conservation Authority would be best positioned to work with the Province on a review and update of the Management of Conservation Authority Land. The Conservation Lands Supervisor would provide valuable input to ensure the Regulations and associated fines are modernized to support the updated setting of fees, permits requirements and enforcement activities not covered in the current Regulation.

Strategy Related to CCCA Lands

Catfish Creek Conservation Authority generally supports the creation of a strategy related to its Conservation Lands. This requirement generates work and new deliverables and therefore has the potential to increase Municipal Levy should the Province not support the Lands strategy development through additional one time and/or ongoing funding. The Province or Conservation Ontario may provide value and efficiently in developing a lands strategy template.

Public participation in the development of the strategy could be problematic due to competing interests with the Municipal Members. The strategy should be created through a CCCA-Municipal working group specific to the task, using provincial guidance/templates.

CCCA properties are generally managed based on the revenue received for each property. Active properties like Springwater generate significant revenue that goes back to support Mandatory programs however this is an unsustainable approach due to asset management. Currently and historically, zero (\$0.00) Municipal Levy dollars support any Conservation Lands for ecological conservation, passive recreation and active recreation. This proposal sets up

potentially more costs for the Province or Member Municipalities for items in the budget that have been managed by revenue other than Provincial funds or Municipal levy.

Catfish Creek Conservation Authority recommends that “Passive recreation” be included in mandatory programs, especially with the huge increase in users as a result of the Pandemic. Catfish Creek Conservation Authority members advised staff of the importance of passive recreation for mental and physical health as a result of the Pandemic. Catfish Creek Conservation Authority makes all properties available to users as a strategy to mitigate security issues. Catfish Creek Conservation Authority proposes that eligibility related to managing properties including a low level of passive recreation (e.g. a walking trail) be included in mandatory. Excluding these costs could see the Catfish Creek Conservation Authority pull out the recreation so the property falls under mandatory. Sealing off a property costs more money for fence construction/maintenance and staff to enforce the Section 29 Regulations.

Should the funding not be secured to maintain the properties, the Province and Municipalities should be prepared for their closure to the public. Enforcement costs would significantly increase with closures as observed during the pandemic. Another option is for the Municipalities or Province to purchase and manage these lands.

Active Recreation infrastructure such as Tree Top Trekking, museums and visitor centers should be considered non-mandatory. Asset maintenance or Capital costs should be considered under Municipal Levy in order to preserve and maintain assets funded through Municipal funds, but not for active recreation infrastructure.

Management Plans

The new mandatory requirements to create management plans is currently not included in Municipal Levy and will come at additional cost to the Province or Municipalities. The Plans should be flexible to allow for regional variations. For example, some properties are managed forests and not marketed to the public for recreation, although used for recreation free of charge to mitigate risk as described above. As a result, management of properties that offer free passive recreation should be included in the Mandatory programs and services.

Some management of lands occurs by the Catfish Creek Conservation Authority on Municipal Lands (e.g. The Town of Aylmer Woodlot Agreement). In this example, the service benefits one municipality that has only one Conservation Authority and thus can be handled flexibly through a separate contract. In this case since Catfish Creek is the only Conservation Authority within the Town of Aylmer, the service could be included in an MOU for non-mandatory services. However, should the service be provided to a Municipality shared by more than one Conservation Authority, it MUST be considered a Special Benefiting Levy or other category or service yet to be determined or classed in order to retain consistent MOUs with a consistent list of non-mandatory programs & services.

Acquisition and Disposal of Lands Policy

Catfish Creek Conservation Authority supports the creation of an acquisition and disposal of lands strategy. Catfish Creek Conservation Authority has a policy available for viewing by the Province on our website: <https://www.catfishcreek.ca/about-us/publications/>. Disposition of lands needs to be flexible.

Mandatory Activities

Maintenance of CCCA property boundaries, access and use must be considered a Core Mandatory program. Specific maintenance activities not related to active recreation include: property inspections, perimeter marking, hazard tree maintenance, and violations/enforcement such as removal of tree stands, monitoring illegal ATV use and monitoring illegal hunting/poaching.

The designation of recreational and educational services on Conservation Lands as non-mandatory vs. those considered natural areas will be challenging for the Catfish Creek Conservation Authority to administer and will come with an increased costs that should be considered as part of the Mandatory Administrative Costs outlined in the proposal as eligible for Municipal Levy.

Mandatory Program #3 of 6: Clean Water Act

Catfish Creek Conservation Authority plays almost no role in implementation of the Drinking Water Source Protection (DWSP) Plan and policies, yet is required to play a legislated and binding role through the Source Protection Authority.

There is no funding currently for the SPA Board Meetings (per diems etc.) and CCCA supports this inclusion under the Administration category. All the DWSP money goes to the Region, with not nearly enough to cover local responsibilities. There is a current shortfall of over \$2,000 annually for administrative and overhead costs of staff and members not covered in the DWSP Provincial Grant Program. As the program is proposed to be mandatory, Catfish Creek Conservation Authority would have no other choice than to use Municipal Levy in the future for these administrative costs moving forward thus increasing the Municipal Levy.

The Province will need to ensure provincial funding continues or else municipalities will need to fully support the Source Protection Region costs leading to competing pressures for municipalities in funding Catfish Creek Conservation Authority's core mandate activities.

Mandatory Program #4 of 6: Lake Simcoe

Not applicable to Catfish Creek Conservation Authority.

Mandatory Program #5 of 6: Responsibilities under another Act

Not applicable to Catfish Creek Conservation Authority.

Mandatory Program #6 of 6: Watershed Resource Strategy

The Catfish Creek Conservation Authority strongly supports the inclusion of mandatory Core Watershed Resource Strategy as it will justify to our Members the integration of all other mandatory programs and identify other non-mandatory programs that support the Watershed Resource Strategy.

The strategy needs to be scalable where the Catfish Creek Conservation Authority could start with a basic or existing out of date strategy and scale up based on capacity. There should be no timeline and/or a clause added to facilitate an extension with the permission of the Minister. The Catfish Creek Conservation Authority does not have the capacity or resources to prepare this work as all 7 Full Time staff workloads are full. A Conservation Ontario or MECP template to complete this requirement may only add to the list of requirements to complete by December 31, 2022.

Due to varied capacity amongst Conservation Authorities, the Catfish Creek Conservation Authority predicts a problem with consistency amongst its neighbours when completing the Watershed Resource Strategy. Should the Province want consistency in this requirement, Catfish Creek Conservation Authority proposes to use Provincial Dollars to support the development of the Plans. Similar to municipalities providing difference services based on their municipal tax base, the same holds true for the Catfish Creek Conservation Authority where the Authority can only deliver programs & services that our Members can afford based on the tax base. The Catfish Creek Conservation Authority cannot immediately provide a strategy up to the level of larger Conservation Authorities unless the province provides more funding since the municipal tax base is not present to support this additional requirement.

Catfish Creek Conservation Authority proposes a funding program similar to the Source Protection Municipal Implementation Fund (SPMIF) and proposed to be called the Conservation Authority Municipal Implementation Fund (CAMIF) where there is a top up or a re-allocation of funds for some of the smaller CAs.

The Provincial Water Quality Monitoring Network (PWQMN) and Provincial Groundwater Monitoring Network (PGMN) are examples of successful cost sharing programs between MECP and Catfish Creek Conservation Authority. The programs provide important information to inform the Watershed Resources Strategy. Additional weather data is collected, managed and reviewed for a total 2021 budget cost of \$15,660.32. This expense is offset by self-generated revenue to the detriment of property and asset maintenance further exacerbating our funding pressures year over year. If the program remains mandatory, the Catfish Creek Conservation Authority would suggest the funding come from either the Province or Municipal Levy.

2. Non-Mandatory Programs and Services that conservation authorities will be required to have agreements with municipalities to fund non-mandatory programs and services with Municipal Levy including a transition plan to support the preparation of municipal agreement

Agreement

The Catfish Creek Conservation Authority is supportive of the flexibility afforded by the agreements. It is preferred that one agreement listing the non-mandatory programs be provided to each Municipality sharing the Conservation Authority jurisdictions to gain consistency. This would discourage the opt in / opt out of certain programs and services. This is important as if too many Members drop out of a particular non-mandatory program for economic, social or political reasons, it may need to be cancelled as the Catfish Creek Conservation Authority could not deliver a partial program due to staffing and other minimum program requirements.

A standardized template from Conservation Ontario or MECP may not be entirely useful since there already templates existing for MOUs with municipalities regarding plan review functions. The Catfish Creek Conservation Authority prefers starting from existing agreements Member Municipalities may already have in place for neighbouring Conservation Authorities, and expand them to cover all the other matters.

The Catfish Creek Conservation Authority is not supportive of alignment of the timeframe for the review and renewal of agreements with Municipal Elections. Agreements/MOUs should be attached to the budget year(s) in which they are approved. Electors making decisions about the agreement around election time may be administratively unworkable due to the reduction in municipal council process and decision making around election time. Expiry or renewal should be between the 1-3 year (midterm) point of a council term.

Transition Plans and Period

The Catfish Creek Conservation Authority supports the extensions to the Transition Period as this will enable flexibility to implement the new requirements with the limited capacity at the Catfish Creek Conservation Authority.

The Catfish Creek Conservation Authority has less than one year to implement all these requirements prior to October 2022 (Nomination Day) for the 2022 election when the Municipal Councils will go *Lame Duck* as per Section 275(2) of the *Municipal Act*. As there is significant information and assumptions to work out through prior to Nomination Day, an extension option via the Minister is important to facilitate flexibility.

3. The consolidation of each of the current individual conservation authority 'Conservation Areas' regulations made under Section 29 of the Conservation Authorities Act into one Minister's regulation.

Introduction

Catfish Creek Conservation Authority is supportive of the proposed amendment to consolidate the S.29 regulations into one Regulation.

As the public often visit Conservation Areas and Lands in multiple jurisdictions, the consolidation of the individual Conservation Areas regulations into one Minister's regulation will ensure consistency with public understanding of the Rules and Regulations within Conservation Lands.

Clarity will need to be provided whether or not the Catfish Creek Conservation Authority must or may exercise these new powers.

Regulatory Updates to modernize compliance tools

As a result of the significant increase in visitors and associated issues that have built up over the Pandemic period, Catfish Creek Conservation Authority staff identified a set of minimum Regulatory updates. These minimum updates include the additional of compliance tools for staff to ensure compliance with the Rules and Regulations within Conservation Lands.

Member municipalities of the Catfish Creek Conservation Authority have minimal to no by-law enforcement. For example, the Town of Aylmer shares a by-law officer with other municipalities and has by-law enforcement only on Wednesdays and focused on parking enforcement. Additional local capacity, training and tools are required for effective enforcement on Catfish Creek Conservation Authority lands.

Compliance Tools or amendments that would be beneficial to the Catfish Creek Conservation Authority include:

- a) Include "Peace Officer" in the definition of Conservation Authority Officer. This will provide the applicable staff with the protection afforded to similar officers under the Criminal Code of Canada and will give the Catfish Creek Conservation Authority staff the appropriate standing should they need to testify in court.
- b) Expand the Class Designation for the Catfish Creek Conservation Authority officers. Catfish Creek Conservation Authority would greatly benefit from an expansion in the Class Designation process to include: *Highway Traffic Act*, *Liquor License Act*, *Motorized Snow Vehicles Act*, and the *Off-Road Vehicles Act*. This would be consistent with the provincial park warden (superintendent/assistant superintendent) Class Designation.
- c) Update Set Fines. Catfish Creek Conservation Authority officers generally do not issue tickets for infractions on their properties and prefer an Education & Outreach approach.

However, as it is one of the few compliance tools that CCCA has available, a review and update of the fines should be undertaken to ensure consistency with comparable pieces of legislation (e.g. municipal by-laws). The Catfish Creek Conservation Authority's set fines for Conservation Areas were last updated in 2012. Revenue from fines for Active Recreation should go back to the Catfish Creek Conservation Authority and revenue from fines for Passive Recreation go back to the applicable Municipality as these fines will likely be associated with Mandatory programs & services.

- d) Require the Public to identify themselves to a Provincial Offences Officer. While Catfish Creek Conservation Authority staff have the ability to issue tickets, there is no requirement for the Public to identify themselves to the Provincial Offences Officer. This significantly limits the Catfish Creek Conservation Authority's ability to enforce the S.29 regulation when necessary and/or unnecessarily complicates the process.
- e) Seizure of an Object. Under the current S.29 Regulation there are a number of offences which are subject to Part I (tickets). For example, it is unlawful to ignite fireworks. A S.29 officer may choose to issue a ticket to a person of legal age who is discharging the fireworks, but they have no ability to seize any remaining fireworks on site. This has led to additional problems in the Springwater Conservation Area in the past.

4. Requirements for each conservation authority to establish a Community Advisory Board to provide advice to the conservation authority.

Introduction

Catfish Creek Conservation Authority is supportive of the proposed amendment to proclaim an un-proclaimed provision of the *Conservation Authorities Act* to enable the creation of an LGIC regulation to require conservation authorities to establish community advisory boards that can include members of the public, to provide advice to the authority Board, contingent on Provincial funding. However, the Community Advisory Board would be more useful for larger Conservation Authorities as opposed to small ones like the Catfish Creek Conservation Authority. The public are able to call Board Members anytime to hear concerns. The public may also attend as a delegation to any Board or Committee meeting.

Scope of Committee Work limited to expertise on the Committee

Catfish Creek Conservation Authority is generally supportive of the proposed "minimum" scope of work to: provide advice and recommendations to the Authority on the Authority's strategic priorities and associated policies, programs and services, to discuss opportunities to co-ordinate with other environmental initiatives in the authority's jurisdiction (e.g. municipal), and finally to identify opportunities for community engagement and suggest potential community outreach opportunities.

It is important to limit the work on policy to those matters the proposed Community Advisory Board has the expertise to hear. As a result, some matters such as financial policies, human resources policies, and health and safety policies, among other policies, should be out of scope for the Community Advisory Board.

Increase in Public Participation

As a small board of 5 Members, public representation on the Catfish Creek Conservation Authority Board of Directors is prohibitive as municipalities have always preferred to have a municipal Councillor fill the seat for the applicable municipality. The establishment of a Community Advisory Board may facilitate new input to the development of policies and plans beyond the current Best Management Practices through additional consultation beyond the current public participation at Board and Committee meetings or ability to call a CCCA Board Member anytime to hear concerns.

Potential for Duplication mitigated by Community Advisory Board Composition

The Community Advisory Board should not be used to duplicate activities of the Full Authority, however used to augment and advise Members and staff regarding certain matters. For CCCA, it is recommended the Advisory Board be composed of 5 Members. The General Manager, one support staff, and perhaps the Authority Chairperson as ex-officio since the Community Advisory Board is advisory in nature, rather than binding in nature.

The Authority Member on the committee should be in addition to the 5 public seats for a total of 6 Members on the committee. This Member position should be ex-officio since the Community Advisory Board is advisory in nature, rather than binding in nature.

Recognizing the term "Community Advisory Board" is enshrined in legislation, Catfish Creek Conservation Authority prefers flexibility to name the Board as a "committee" and reference the Legislative requirement through the Catfish Creek Conservation Authority Administrative By-Laws.

The Community Advisory Board should be discretionary and the Catfish Creek Conservation Authority should be able to opt out with Ministers permission this additional layer of governance to advise the Board.

Community Advisory Board Composition and Committee Member Residing in CA Jurisdiction

The minimum number of Members should be 7, not 5, should the province's proposal of a minimum of one Authority Member (15%) be maintained. Catfish Creek Conservation Authority prefers the Province to change the 15% to 20% and then the committee can be at 5 as the Catfish Creek Conservation Authority prefers the smallest Community Advisory Board size as possible.

In terms of Member jurisdiction, Catfish Creek Conservation Authority suggests the composition of the Community Advisory Board mirror the geography of the Board composition. Members should not be selected from the Authorities jurisdiction as a whole, but rather based on

municipality in which they reside. In CCCA's case, this means 5 public Members, one from each Member lower-tier municipality plus the proposed two (2) ex-officio staff and one (1) ex-officio Board Member.

Composition of the Community Advisory Board must be diverse and from a range of stakeholders and expertise. The composition should be designed similar to source protection committees (Industry, Tourism, First Nations, Other).

In terms of First Nation membership, based on the lessons from Source Water Protection, it is likely that representation from a First Nation community would be difficult to establish due to capacity at First Nations. In addition, Catfish Creek Conservation Authority does not have any First Nations Reserves, however is subject to treaty lands. First Nation representation should be considered in light of the above issues.

Additional Cost to establishing a Community Advisory Board

The Community Advisory Board will change the organizational structure and require an additional level of coordination and communication within the organizational structure which will require Administrative support (e.g. governance, administration, finance, establish and maintain committee etc.) from Member municipalities.

Catfish Creek Conservation Authority has received significant pushback from Municipal Councilors regarding any increase in Municipal Levy. As the Catfish Creek Conservation Authority receives the smallest amount of Municipal Levy in the Province of Ontario by almost 50%, the Member Municipalities must be willing to accept the additional cost to deliver the additional layer of governance. Any additional funds from the Province to implement will be welcome. Making the Advisory Board optional or lengthening of the transition period to implement the Community Advisory Board could mitigate the financial impact of establishing this new requirements.

Fixed costs to provide Administrative support to the Community Advisory Board should be expressly included in the Administration costs for Mandatory programs and services.

Terms of Reference vs. Administrative By-Laws

Catfish Creek Conservation Authority supports the proposal to defer other specific details related to the composition, activities, functions, duties, and procedures of the community advisory board to a Terms of Reference document. This will ensure the Catfish Creek Conservation Authority can develop a Terms of Reference that is suitable for its unique needs.

For the purposes of consistency across the Province and to mitigate the differences in the Catfish Creek Conservation Authority Administrative By-Laws as compared to other Conservation Authorities, the Catfish Creek Conservation Authority supports the proposal to expressly prescribe the matters related to accountabilities of the Community Advisory Board such as reporting and accountability of the Community Advisory Board to the Catfish Creek Conservation Authority Board of Directors. Catfish Creek Conservation Authority prefers the requirement that meeting procedures and relevant policies regarding Community Advisory

Board operation (including quorum, chair, vice-chair and secretary) be amended to Section B.15 of the Catfish Creek Conservation Authority Administrative By-Laws to ensure consistency with other Boards and Committees.

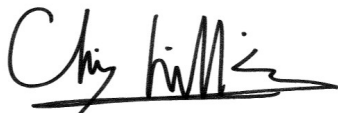
Catfish Creek Conservation Authority fully supports the proposal that meetings of the community advisory board be open to the public, with limited exceptions as outlined for in-camera meetings in the Catfish Creek Conservation Authority Administrative By-Laws. Catfish Creek Conservation Authority also fully supports the requirement that all meeting minutes, and the current Terms of Reference, be posted on the internet. The proposal will require updating if the inclusion of the Best Management Practices of the Community Advisory Board is required to be included in the Catfish Creek Conservation Authority Administrative By-Laws as opposed to the proposed Terms of Reference.

Catfish Creek Conservation Authority fully supports the proposal to align certain meeting procedures and protocols such as attendance and codes of conduct, however the alignment is preferred to be via the Catfish Creek Conservation Authority Administrative By-Laws rather than the proposed Terms of Reference document. This will require a By-Law update, including updating the code of conduct in Appendix 1 of the Catfish Creek Conservation Authority Administrative By-Laws to include the additional criteria. The process to establish Member removal is preferred to be included in the Regulation rather than the Terms of Reference or the Catfish Creek Conservation Authority Administrative By-Laws.

Funding for the Community Advisory Board should be considered under the Administrative costs for mandatory program. Mileage should be provided to the individual or the organization to which they work, however Board positions should be volunteer with no per-diem provided.

Please let me know if you have any questions on the CCCA submission to ERO#: 019-2986.

Sincerely,



Christopher Wilkinson
General Manager / Secretary-Treasurer
Catfish Creek Conservation Authority

Cc:

Rick Cerna, Councillor, Township of Malahide
Sally Martyn, Mayor, Municipality of Central Elgin
Lori Baldwin-Sands, Councillor, City of St. Thomas
Arthur Oslach, Councillor, Town of Aylmer
Paul Buchner, Councillor, Municipality of South-West Oxford

*Mission Statement: "To communicate and deliver resource management services and programs
In order to achieve social and ecological harmony for the watershed"*