



**Grand River Conservation Authority
Agenda - Source Protection Authority Meeting**

Friday, October 25, 2024

9:30 a.m.

Hybrid Meeting of the General Membership

GRCA Administration Centre

Zoom Virtual Meeting

Pages

1. **Call to Order**

2. **Certification of Quorum**

3. **Chair's Remarks**

4. **Review of Agenda**

THAT the agenda for the Source Protection Authority Meeting be approved as circulated.

5. **Declarations of Pecuniary Interest**

6. **Minutes of the Previous Meetings**

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THAT the minutes of the Source Protection Authority Meeting of August 23, 2024 be approved as circulated.

7. **Business Arising from Previous Minutes**

8. **Hearing of Delegations - None**

9. **Presentations - None**

10. Correspondence

THAT correspondence from the Ministry of the Environment, Conservation and Parks regarding approval of the Catfish Creek and Grand River Assessment Reports and Source Protection Plans be received for information;

AND THAT correspondence from the Lake Erie Region Source Protection Committee regarding amendments to the Grand River Assessment Report and Source Protection Plan be received as information.

- a. Ministry of the Environment, Conservation and Parks re: Approval of Assessment Report and Source Protection Plan - Catfish Creek 4
- b. Ministry of the Environment, Conservation and Parks re: proposed amendments to Assessment Report and Plan regarding the Shelburne Drinking Water System 6
- c. Lake Erie Region Source Protection Committee re: Submission of the Amended Grand River Assessment Report and Source Protection Plan 7

11. 1st and 2nd Reading of By-Laws

12. Reports

- a. SPA-10-24-01 - Submission of the amended Grand River Source Protection Plan and Assessment Report 8

THAT staff be directed to submit the amended Grand River Source Protection Plan and Assessment Report to the Minister of the Environment, Conservation and Parks for approval.

1. Supporting Documentation

The supporting documentation includes the Assessment Report revisions, an Explanatory Document, and Source Protection Plan revisions. These are provided digitally for reference only. They include the full revisions and comment submissions as summarized in the above report. The supporting documentation can be provided in an alternate format upon request.

- b. SPA-10-24-01 - Lake Erie Region Source Protection Committee Member Appointments

THAT the Grand River Source Protection Authority appoint Emily Stahl to the Lake Erie Region Source Protection Committee for a four-year term, as a municipal representative;

AND THAT the Grand River Source Protection Authority re-appoint Alan Dale and Phil Wilson to the Lake Erie Region Source Protection Committee for four-year terms, as a public interest representatives;

AND THAT the Grand River Source Protection Authority appoint Nancy Goucher to the Lake Erie Region Source Protection Committee for a four-year term, as a public interest representative.

13. **Committee of the Whole**
14. **General Business**
15. **3rd Reading of By-Laws**
16. **Other Business**
17. **Closed Meeting - Not required**
18. **Next Meeting - At the Call of the Chair**
19. **Adjourn**

Regrets only to:

Office of the Chief Administrative Officer, Phone: 519-621-2763 ext. 2200



Grand River Conservation Authority Minutes - Source Protection Authority Meeting

Date: August 23, 2024
Time: 9:30 am
Location: Hybrid Meeting
Members Present: Bruce Banbury, Christine Billings, Gino Caputo, John Challinor II, Brian Coleman, Doug Craig, Jim Erb, Susan Foxtton, Guy Gardhouse, Gord Greavette, Lisa Hern, Colleen James, Daniel Lawrence, Dave Miller, Sandy Shantz, Rob Shirton, Jerry Smith, Shawn Watters, Chris White, Kari Williams, Pam Wolf
Members Regrets: Ken Yee Chew, Kevin Davis, Mike Devine, Natasha Salonen, Alex Wilson
Staff: Samantha Lawson, Karen Armstrong, Beth Brown, Krista Bunn, Brandon Heyer, Murray Lister, Katelyn Lynch, Sonja Radoja, Lisa Stocco, Mark Anderson, Benjamin Cheng, Shari Dahmer, Cameron Irvine, Mitch Jewson, Megan Kitchen, Eowyn Spencer

1. Call to Order

The Meeting was called to order by the Chair at 9:30 a.m.

2. Certification of Quorum

The Secretary-Treasurer certified quorum with more than half of the Members present. A total of 21 Members attended the meeting.

3. Chair's Remarks

C.White welcomed Members to the meeting and advised that Vice-Chair Susan Foxtton will be acting Chair for this meeting, as he is unable to attend in person today.

4. Review of Agenda

24-11

Moved By Pam Wolf

Seconded By Shawn Watters

THAT the agenda for the Source Protection Authority Meeting be approved as circulated.

Carried

5. Declarations of Pecuniary Interest

There were no declarations of pecuniary interests made in relation to the matters to be dealt with.

6. Minutes of the Previous Meetings

24-12

Moved By John Challinor II

Seconded By David Miller

THAT the minutes of the Source Protection Authority Meeting of May 24, 2024 be approved as circulated.

Carried

7. Business Arising from Previous Minutes

There was no business arising from the minutes of the previous meeting.

8. Hearing of Delegations

There were no Delegations.

9. Presentations

There were no Presentations.

10. Correspondence

10.1 Ministry of Environment, Conservation and Parks - Source Protection Report and Plan for Kettle Creek Source Protection Authority

There were no comments or concerns regarding the correspondence.

24-13

Moved By Kari Williams

Seconded By Brian Coleman

THAT Correspondence from the Ministry of Environment, Conservation and Parks regarding the Source Protection Report and Plan for Kettle Creek Source Protection Authority be received as information.

Carried

11. 1st and 2nd Reading of By-Laws

None.

12. Reports

12.1 SPA-08-24-01 - Source Protection Committee Member Appointments

There were no comments or concerns regarding the report.

24-14

Moved By Gord Greavette

Seconded By Pam Wolf

THAT the Grand River Source Protection Authority appoint Andrew Henry to the Lake Erie Region Source Protection Committee for a four-year term, as a public interest representative.

Carried

- 13. **Committee of the Whole**
Not required.
- 14. **General Business**
There was no General Business.
- 15. **3rd Reading of By-Laws**
None.
- 16. **Other Business**
There was no Other Business.
- 17. **Closed Meeting - Not required.**
- 18. **Next Meeting - At the Call of the Chair**
- 19. **Adjourn**
The meeting was adjourned at 9:33 a.m.

24-15

Moved By Bruce Banbury

Seconded By Sandy Shantz

THAT the Source Protection Authority Meeting be adjourned.

Chair

Secretary-Treasurer

**Ministry of the Environment,
Conservation and Parks**

**Ministère de l'Environnement,
de la Protection de la nature et
des Parcs**



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357-2024-1375

September 10, 2024

Paul Buchner, Chair
Catfish Creek Source Protection
Authority
c/o Catfish Creek Conservation Authority
8079 Springwater Road
Aylmer, Ontario N5H 2R4

Steve Walsh, Chair
Lake Erie Source Protection Committee
c/o Grand River Conservation Authority
400 Clyde Road, PO Box 729
Cambridge, ON N1R 5W6

Chris White, Chair
Grand River Source Protection Authority
400 Clyde Road, PO Box 729
Cambridge, ON N1R 5W6

Dear Mr. Buchner, Mr. Walsh, and Mr. White,

I am pleased to inform you that the Ministry of the Environment, Conservation and Parks has approved the updated assessment report and source protection plan for the Catfish Creek Source Protection Area. These updates will take effect on the day a notice of this decision is posted on the Environmental Registry.

When the initial plan was approved on September 19, 2014, an order was issued under section 36 of the *Clean Water Act, 2006* governing the future review of the plan, with an amended order issued on July 22, 2019, outlining the specific requirements. The amended order allowed for the Grand River Source Protection Authority (as the lead SPA of the Lake Erie Source Protection Region), along with the Catfish Creek Source Protection Authority and the affected municipalities, to address the workplan items and ensure changes comply with the 2021 Technical Rules. I am advised that the set of required updates were completed and submitted to the ministry for approval. With the approval of these updates, compliance with the section 36 order has been achieved.

To ensure your source protection plan remains current and continues to protect sources of drinking water, future updates to the plan can be made through locally initiated amendments under section 34 of the Act. This would include updates to reflect new or expanding drinking water systems, new scientific or technical information, revisions to policies to address implementation challenges, and any other updates that are necessary to ensure your source protection plan is achieving its objectives to ensure that activities cease to be, or never become, significant threats to sources of drinking water.

I appreciate and am grateful for the dedication of the local municipalities, source protection authorities and committees, and all our partners and stakeholders for their work and contributions to these updates. Our strong protection framework will continue to help ensure Ontario's drinking water is held to high safety standards and that sources of drinking water in the province are protected for future generations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andrea Khanjin', with a stylized, overlapping loop at the end.

Andrea Khanjin
Minister

C: Shari Dahmer, Project Manager, Lake Erie Source Protection Region
Dusty Underhill, General Manager/Secretary-Treasurer, Catfish Creek Source Protection Authority
Kirsten Service, Director, Conservation and Source Protection Branch, Ministry of the Environment, Conservation and Parks



Office of the Minister

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September 9, 2024

357-2024-1393

Chris White, Chair
Grand River Conservation Authority
400 Clyde Road, PO Box 729
Cambridge, ON N1R 5W6

Steve Walsh, Chair
Lake Erie Region Source Protection
Committee
400 Clyde Road, PO Box 729
Cambridge, ON N1R 5W6

Dear Chairs White and Walsh,

It is a pleasure to inform you that the Ministry has completed the review of the amended Grand River Assessment Report and Grand River Source Protection Plan related to proposed changes to the Shelburne Drinking Water System located in the Town of Shelburne and Townships of Melancthon, Amaranth, and East Garafraxa, in the County of Dufferin, developed in accordance with the *Clean Water Act, 2006*.

I approve the amendments pursuant to section 34 of the *Clean Water Act, 2006*. These amendments will take effect on the day a notice of this decision is posted to Ontario's Environmental Registry.

I appreciate the dedication of the local municipalities, source protection authorities and committees, and all our partners and stakeholders for their work and contributions to these amendments to ensure that the quality of Ontario's municipal drinking water sources continue to be protected.

Our strong protection framework will continue to help ensure Ontario's drinking water is held to high safety standards and that sources of drinking water in the province are protected for future generations.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrea Khanjin".

Andrea Khanjin
Minister of the Environment, Conservation and Parks

C: Shari Dahmer, Source Protection Program Manager, Lake Erie Region Source Protection Authority
Kirsten Service, Director, Conservation and Source Protection Branch, MECP

October 16, 2024

Chris White, Chair
Grand River Conservation Authority
400 Clyde Rd
Cambridge, ON N1R 5W6

Dear Chair White

RE: Submission of the Amended Grand River Assessment Report and Source Protection plan

Work under Section 34 of the of the *Clean Water Act, 2006* (CWA) to amend the Grand River Assessment Report and Source Protection Plan has been completed for proposed updates that affect the Region of Waterloo, the Cities of Cambridge, Kitchener, Waterloo, and the Township of North Dumfries.

On September 26, 2024 the Lake Erie Region Source Protection Committee (SPC) passed the following resolution:

THAT the Lake Erie Region Source Protection Committee release the S.34 amendment to the Grand River Assessment Report and Source Protection Plan to the Source Protection Authority for submission to the Ministry of the Environment, Conservation and Parks.

As such, this letter serves as a notice pursuant to the requirements of Ontario Regulation 287/07, which requires the SPC to submit the amended Grand River Assessment Report and Source Protection Plan to the Grand River Source Protection Authority (SPA).

The SPA is now tasked with submitting the Assessment Report and Source Protection Plan, together with the Updated Explanatory Document, to the Ministry of the Environment, Conservation and Parks (MECP) for approval.

Further details about the amendment can be found in report SPA-10-25-01.

Sincerely,



Steve Walsh
Chair, Lake Erie Source Protection Committee
cc: Samantha Lawson, Chief Administrative Officer, GRCA

Grand River Source Protection Authority

Report number: SPA-10-24-01

Date: October 25, 2024

To: Members of the Grand River Source Protection Authority

Subject: Submission of the amended Grand River Source Protection Plan and Assessment Report

Recommendation:

THAT staff be directed to submit the amended Grand River Source Protection Plan and Assessment Report to the Minister of the Environment, Conservation and Parks for approval.

Summary:

Work under Section 34 of the of the *Clean Water Act, 2006* (CWA) to amend the Grand River Assessment Report and Source Protection Plan has been completed for proposed updates that affect the Region of Waterloo, the Cities of Cambridge, Kitchener, Waterloo, and the Township of North Dumfries.

Amendments include updates to the wellhead protection areas and vulnerability scores for the Erb Street, Strange Street, Blair Road, and William Street wellfields, and new water quality policies to address liquid hydrocarbon pipeline threats.

Following completion of a consultation process, the Grand River Source Protection Authority has the responsibility to submit the amended Grand River Assessment Report and Source Protection Plan to the Ministry of the Environment, Conservation, and Parks for approval. The Grand River Source Protection Authority does not approve these documents but may include any comments it wishes to make, along with the submission package as outlined in O. Reg. 287/07.

Report:

Amendments to drinking water source protection plans can be initiated locally, for instance as a result of changes to a municipal drinking water system, under Section 34 of the *Clean Water Act, 2006*.

The Grand River Source Protection Plan is being amended to incorporate updates to the wellhead protection areas and vulnerability scores for the Erb Street, Strange Street, Blair Road, and William Street wellfields in the Region of Waterloo, and new water quality policies related to the establishment and operation of a liquid hydrocarbon pipeline. Source protection technical work and policy updates have been completed and presented to the Lake Erie Region Source Protection Committee.

The Region of Waterloo operates 18 municipal drinking water systems that serve a total population of approximately 647,540 (2022). Groundwater is extracted from over 120 wells throughout the Region and one surface water intake. Together these sources are capable of supplying approximately 279,000 m³/day. Groundwater studies to evaluate and update the wellhead protection areas and vulnerability scores were driven by the need for increased water taking and infrastructure updates. Updated wellhead protection area maps and drinking water threat assessments have been incorporated into the Grand River Assessment Report.

In 2018, the Ministry of the Environment, Conservation and Parks (MECP) revised the Ontario Regulation 287/07 to include “the establishment and operation of a liquid hydrocarbon pipeline” as a prescribed drinking water threat. As the hydrocarbon pipeline industry is heavily regulated both federally and provincially, the new source protection policies focus on ensuring source protection is considered as a risk factor in pipeline operations, emergency planning, and siting of new pipelines.

As part of the Section 34 amendment process, municipalities and ministries affected by the amendments were notified of the proposed changes and the opportunity for pre-consultation. Municipal Council resolutions in support of the amendments were received from the Region of Waterloo, City of Cambridge, City of Kitchener, City of Waterloo, and Township of North Dumfries. A formal public consultation period followed, and notification letters were provided to persons with properties affected by the proposed changes. **Appendix A** summarizes the pre-consultation and public consultation comments that were received and how they have been addressed.

The Lake Erie Region Source Protection Committee has reviewed the amendments and results of the consultation and released the draft amended Grand River Assessment Report and Source Protection Plan to the Grand River Source Protection Authority for submission to the Ministry of the Environment, Conservation, and Parks for approval. The Grand River Source Protection Authority does not approve these documents but may include any comments it wishes to make, along with the submission package as outlined in O. Reg. 287/07.

Financial Implications:

The Source Protection Program is funded 100% by the Province and costs have been accounted for in the approved budget.

Other Department Considerations:

Not applicable.

Prepared by:

Shari Dahmer
Source Protection Program Manager

Approved by:

Samantha Lawson
Chief Administrative Officer

Appendix A:
Consultation comments and how they are addressed

Table 1 Consultation comments and responses for s.34 amendment to the Grand River Assessment Report and Source Protection Plan (Region of Waterloo)

Comment Source	Comment Period	AR/SPP Section	Comment	How comment has/will be addressed
MECP	Pre-consultation (May 28, 2024)	AR, Chapter 8	Map 8-29 duplicates the same information as Map 8-28. Please clarify and remove any redundancy where appropriate.	<p>Map 8-28 shows the unadjusted intrinsic vulnerability for the Middle Waterloo Moraine Sands while Map 8-29 shows the adjusted intrinsic vulnerability for the Middle Waterloo Moraine Sands (within which the overburden wells W1B, W1C, W2B, and W2C are completed). The adjusted map shows areas where the intrinsic vulnerability was modified to account for the presence of transport pathways. In contrast, no intrinsic vulnerability adjustments were made for the bedrock aquifer (impacting well W3A) and therefore a single intrinsic vulnerability map is included (Map 8-30). This information is presented in the section titled "Vulnerability and Transport Pathways: William Street Wellfield". Text in this section has been reorganized and further elaborated to frame the incorporated maps more clearly:</p> <p>“Analysis of the attributes of each potential transport pathway in the William Street WHPA resulted in the identification of a number of features (e.g., deep excavations, well clusters, closely spaced underground services) situated within the WHPA-A through to the WHPA-D that warranted an increased ISI for the overburden aquifer. The unadjusted intrinsic vulnerability is shown on Map 8-28 and the adjusted intrinsic vulnerability is shown on Map 8-29. No ISI adjustments were made for the bedrock aquifer. The associated intrinsic vulnerability is shown on Map 8-30. Map 8-31 and Map</p>

Comment Source	Comment Period	AR/SPP Section	Comment	How comment has/will be addressed
				8-32 show the final vulnerability scoring, the former of which highlights the area of influence for the transport pathway adjustments in the overburden aquifer.”
MECP	Pre-consultation (May 28, 2024)	AR, Chapter 8	<p>The DNAPL concentrations for the William Street overburden wells seem virtually stable with a potential declining trend. Please consider this trend in future updates of the assessment report and determine whether a DNAPL-ICA will still be needed.</p> <ul style="list-style-type: none"> In addition, please comment on whether there is any evidence that activities or past activities (Conditions) in the WHPA-D may be linked to the DNAPL-ICA. 	<p>The Region of Waterloo will take these trends into consideration in the upcoming S.36 update to the Grand River AR/SPP. Note that the Issue is for trichloroethylene (TCE).</p> <p>The TCE WHPA-ICA and associated SPP policies have been created in an attempt to avoid any further contributions of TCE to the aquifer from new activities and to increase the priority of mitigating any existing TCE contaminated areas (Conditions) within the ICA. There are five TCE Condition sites in the William Street WHPAs B-D. TCE contamination within any part of the capture zone may result in contamination reaching the supply wells due to TCE’s mobility, recalcitrance, and low MAC. It is well documented that TCE plumes in overburden aquifers can be extensive (kilometers in scale) (reference, for example, Section 1.6 of “Dense Chlorinated Solvents and other DNAPLs in Groundwater”, Pankow and Cherry, 1996). The WHPA-D has consistently been chosen as the ICA for wells with a TCE Issue in the Region, which has been both implementable and protective.</p>
MECP	Pre-consultation (May 28, 2024)	AR, Chapter 8	Please provide complete information/assessment on the sixth contaminated site, identified as a significant threat condition, in William Street DWS to meet the technical rules requirements under TR 126	Table 8-15 has been added to the section titled "Threats and Issues Enumeration for the William Street Wells". This table summarizes the risk assessment for all significant Condition sites in the

Comment Source	Comment Period	AR/SPP Section	Comment	How comment has/will be addressed
			<p>and Part XI.5, with the evidence of off-site contamination or migration towards the wells.</p> <ul style="list-style-type: none"> In addition, please indicate which WHPA these contaminated sites are located, besides the DNAPL-ICA. 	<p>William Street WHPAs, including which WHPA these contaminated sites are located within.</p> <p>The “sixth contaminated site” has been discussed at regular meetings with the MECP Guelph District office, as per policy RW-NB-1.21.</p>
MECP	Pre-consultation (May 28, 2024)	SPP, Chapter 10	<p>Policy RW-NB-61:</p> <p>The policy requests that the Canada Energy Regulator or the Ontario Energy Board should ensure that the Source Protection Authority and the Region of Waterloo are provided the location of any newly proposed pipeline.</p> <p>You may also want to consider directing all actions for this policy to the SPA to ensure it is being implemented.</p> <ul style="list-style-type: none"> For example: <i>The Source Protection Authority shall engage CER, OEB and pipeline proponents once per calendar year and request the location of any new proposed pipeline applications. The SPA shall document in the annual report the number of new</i> 	<p>Changes to this policy would impact multiple municipal chapters, as the proposed suite of policies for liquid hydrocarbon pipelines was endorsed by the SPC (Dec. 2021) to apply across Lake Erie Region and received support from all municipalities.</p> <p>We propose not to revise RW-NB-61 as part of this s.34 amendment to align with related policies adopted through previous amendments in other areas:</p> <ul style="list-style-type: none"> S.36, Catfish Creek SPP S.36, Kettle Creek SPP S.34, Shelburne Update, Grand River SPP <p>However, this can be reconsidered as part the S.36 updates for the Long Point Region and Grand River SPPs.</p>

Comment Source	Comment Period	AR/SPP Section	Comment	How comment has/will be addressed
			<p><i>pipelines proposed within vulnerable areas if a pipeline has been proposed and/or application has been received.</i></p> <p>This action would also support the ability of regulators to consider drinking water source protection as a risk factor (as included in policy RW-NB-61.1) and the ability of pipeline owners to access the best available source protection information (as included in RW-NB-61.2).</p>	
MECP	Pre-consultation (May 28, 2024)	SPP, Chapter 10	<p>Minor editorial errors:</p> <ul style="list-style-type: none"> • Policy RW-NB-61.2, ‘the’ missing in sentence “...pipeline owners should ensure that <u>the</u> best available source protection information is used...” • Missing period at the end of Policy RW-CW-1.1.1. 	Noted. Editorial edits will be made.

Grand River Source Protection Authority

Report number: SPA-10-25-02

Date: October 25, 2024

To: Members of the Grand River Source Protection Authority

Subject: Source Protection Committee Member Appointments

Recommendation:

THAT the Grand River Source Protection Authority appoint Emily Stahl to the Lake Erie Region Source Protection Committee for a four-year term, as a municipal representative;

AND THAT the Grand River Source Protection Authority re-appoint Alan Dale and Phil Wilson to the Lake Erie Region Source Protection Committee for four-year terms, as public interest representatives;

AND THAT the Grand River Source Protection Authority appoint Nancy Goucher to the Lake Erie Region Source Protection Committee for a four-year term, as a public interest representative.

Report:

The Grand River Source Protection Authority (SPA) has the responsibility of appointing representatives to the Lake Erie Region Source Protection Committee (SPC), under the *Clean Water Act, 2006*.

The Lake Erie Region SPC is comprised of 24 members and a provincially-appointed Chair, including municipal, economic, public interest, and First Nations representatives.

Ontario Regulation 288/07 details the size of each SPC and the appointment process for different sector representatives. The municipal sector has 7 seats on the SPC. Municipal members represent groups of municipalities which jointly nominate a representative. There is a public process for soliciting representatives for the 7 economic and 7 public interest seats.

The Lake Erie Region Management Committee (LERMC) supports the SPA by providing guidance and making recommendations with respect to SPC membership.

Municipal Representative

The City of Guelph has provided a letter of support, nominating **Emily Stahl**, the Manager, Technical Services of the City's Water Division to the Lake Erie Region SPC. Ms. Stahl will replace Peter Rider who has been a member of the SPC since 2013. The LERMC considered the nomination and passed a resolution recommending that the SPA appoint Emily Stahl to the SPC for a four-year term.

Economic Representative

As of the end of November, there will be two vacant seats on the Source Protection Committee for economic sector representatives. A [call for applications](#) has been posted to the Lake Erie Region website. To be eligible, applicants must be employed by or operate a business within Lake Erie Source Protection Region.

Public Interest Representatives

The term of appointment for public interest representative **Alan Dale** will expire in November 2024. The LERMC passed a resolution recommending that the SPA re-appoint Alan Dale to the SPC for a four-year term.

The public interest seat filled by **Phil Wilson** is reserved for a representative of the Nanticoke Regional Water Supply System, which represents the interests of a regional water supply strategy that could supply water to neighbouring municipalities and First Nations communities. The term of appointment for Mr. Wilson expired in September 2024. Haldimand County has provided a letter of support for his re-appointment. The LERMC considered the nomination and passed a resolution recommending that the SPA re-appoint Phil Wilson to the SPC for a four-year term.

Following an interview conducted by Shari Dahmer, Samantha Lawson, and Chair Walsh, the LERMC is recommending the appointment of **Nancy Goucher** as a public interest representative for a four-year term. Ms. Goucher has a background in water policy and knowledge mobilization and has previous experience as a member of the CTC Source Protection Committee.

Financial Implications:

The Source Protection Program is funded 100% by the Province and costs have been accounted for in the approved budget, including per diems and travel expenses for SPC members.

Other Department Considerations:

Not applicable.

Prepared by:

Shari Dahmer
Source Protection Program Manager

Approved by:

Samantha Lawson
Chief Administrative Officer