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PLANNING, RESEARCH & DEVELOPMENT
DEPARTMENT OF THE ATTORNEY GENERAL

KIRBY MUNICIPAL BY-LAW
RECOMMENDATIONS STUDY

SEPTEMBER 28, 1978

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ACQUISITIONS

Hickling-Johnston

September 28th, 1978

Mr. A. Harris
Planning, Research & Development
Department of the Attorney General
320 Boardwalk
10310 - 102 Avenue
EDMONTON, Alberta

Dear Mr. Harris:

We at Hickling-Johnston are pleased to submit our final report on the Kirby Municipal By-Law Recommendations Study. It presents a pragmatic assessment of suggested improvements to the by-law process, and how they might be implemented.

The participants in the study (including the various components of the Attorney General's Department, the Department of Municipal Affairs, various municipalities and their associations, and representatives of jurisdictions outside Alberta) generally agreed with the directional changes suggested by the Kirby Recommendations. However, doubts were expressed on how several of the specific suggestions embodied within these recommendations would aid in alleviating existing problems in the by-law process.

Hickling-Johnston, in consultation with the study participants developed a series of modified recommendations and presented them within a suggested implementation framework. The following general positions were reached by the study team:

- the problems with the municipal by-law process extend beyond the court system into the actual drafting, enactment, consolidation, and enforcement activities that occur solely within the municipalities' control;
- to effectively implement any changes to the municipal by-law process, the Attorney General's Department and the Department of Municipal Affairs must establish a shared responsibility for executing the suggested implementation activities;

. . . /2

- the municipalities of Calgary and Edmonton, together with the two major municipality associations in Alberta, should be involved in an Advisory Committee capacity throughout the implementation of changes to the by-law process. These parties have highly relevant expertise to offer and will play a key liaison role.

Specific recommendations that are made in the report include:

- the drafting of by-laws by municipalities needs to be upgraded through the development (or enhanced use) of a standard set of by-laws; through the increased use of provincial legislation for offences common to many municipalities; and through a "by-law consolidation" service, probably an extension of the service already offered through the Alberta Urban Municipalities Association;
- the currently proposed legislation to allow by-law consolidation by the Municipal Secretary should be supported and enacted. Subsequently, consolidation of by-laws should be done in the major centers of Alberta. This will improve communication with the Public, and will eliminate some of the current inefficiencies;
- the increased powers suggested in the Kirby Recommendations should be provided to municipalities through legislation. However, control procedures need to be designed to ensure their proper use by the municipality;
- the maximum fines for by-law offences should be increased;
- the removal of jail as a sanction for non-payment of fines should only be considered after further in-depth study of its impact. Also, study should be made of the possibility of utilizing jail as a sanction only on the application of the court. The large municipalities in particular feel a strong need for a visible and severe sanction of particularly bad or habitual offenders;

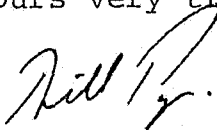
- while a separate by-law court, including a special judge (justice of the peace), prosecutor and court room seems desirable, there is only a limited need as volumes are extremely low, except in Edmonton and Calgary. Scheduling should be improved where possible to maintain continuity of personnel, however;
- changes towards proposed Ontario legislation, including the use of justices of the peace and the establishment of unique terminology (admitted vs. guilty), should be closely studied. While Kirby has recommended that this type of change be adopted, it was the view of the participants in the study that the current situation in Alberta does not warrant the changes immediately, in that the impacts of the proposed changes in the longer term are not understood to the degree desired. However, the participants did feel that further analysis of this area was extremely worthwhile.

In conclusion, we would like to make three comments that reflect the environmental conditions under which the recommendations and suggested actions in the final report have been developed, and which should be considered in their interpretations:

- municipalities are primarily interested in gaining compliance with their regulatory by-laws. Consequently, the municipalities tend to use moral suasion in the place of the formal laying of charges - but like to have sufficient powers available to provide an incentive to the offenders to comply readily with the moral suasion;
- the regulatory by-law load on the court system is so small as to make changes in it solely for the purposes of court efficiency hard to justify. If municipalities laid charges rather than using moral suasion, this might not be the case;
- the Public comes in contact most frequently, after traffic laws, with regulatory municipal by-laws. Consequently, improvements to the municipal by-law process should be viewed as having a positive long term impact in building a higher level of Public respect for the law in general.

We trust that you will find this report helpful in implementing improvements to the municipal by-law process. We as a firm have greatly enjoyed this assignment, and wish to express our gratitude to all of those who participated in the study with us, and who so kindly provided us with information. In particular, we would like to thank the members of Project Omega for their co-operation and support.

Yours very truly,

A handwritten signature in dark ink, appearing to read "W.J. Page". The signature is fluid and cursive, with a large initial "W" and a stylized "P".

W.J. Page
Principal

WJP:smt

Enclosure

PLANNING, RESEARCH & DEVELOPMENT

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I

EXECUTIVE SUMMARY

1. INTRODUCTION

The Kirby Municipal By-Law Recommendations Study was commissioned by Project Omega of the Attorney General's Department early in July of 1978. The Study Objectives were to:

- "1. Further define the problems indicated in the report, including the scope and impact of the problems.
2. Assess the potential impact of the recommendations on the defined problems and various agencies.
3. Develop a plan of action for proceeding with the objective of implementing the recommendations, taking into account the findings in Items 1 and 2."

1.1 A Working Committee Brought Affected Parties Together

The By-law process involves numerous agencies, departments, and sizes of municipalities. Each has their own perspective on the process. Hickling-Johnston established a Working Committee to allow a representative of these groups to be actively involved in the review and analysis process of the study, and to facilitate HJL's data gathering.

The Working Committee had membership from:

- Cities of Calgary and Edmonton
- Alberta Urban Municipalities Association
- Alberta Association of Municipal Districts and Counties
- Attorney General
 - Criminal Justice
 - Legal Research
 - Project Omega (Planning, Research & Development)
 - Court Services
- Judiciary
- Municipal Affairs

1.2 An Extensive Data Gathering Process Was Used

A thorough assessment of the By-law process problems and the Kirby Recommendations was conducted through a series of in-depth interviews; distribution of questionnaires to a wide spectrum of municipalities, court clerks, judges, and prosecutors; and by analyzing the relevant court loading and by-law statistical information. In total this information provided what the Working Committee felt to be an accurate representation of the problem and recommendations.

1.3 The Assessment of The By-Law Process Led To A Plan For Implementing Recommended Changes

Hickling Johnston's assessment of the problems with the By-law process, and the assessment of the Kirby Recommendations relative to these, resulted in the generation of a revised set of recommendations. These were placed into an implementation plan framework, which is described in Section 3 of this chapter.

1.4 Further Developments Depend On The Approval Of A Joint Committee

This final report of the Kirby Municipal By-law Recommendations Study requires the joint approval of the Attorney General's Department and the Department of Municipal Affairs. Both Departments are involved in the required actions. There must be a formal statement of responsibilities to allow for proper budgetary and project direction. The Joint Committee will also establish the final implementation plan priorities and timing. It merits mention that while there are no immediately critical activities recommended, the Joint Committee should endeavour to reach agreement on responsibilities and the final plan in one or two months - providing a minimum of opportunity for the project to lose momentum.

1.5 Municipalities Have Been And Must Continue To Be Involved

The study to this point has emphasized contact with the municipalities - directly or through their associations. Implementation - including the final plan approval - must involve them fully as advisers and liaisons. The importance of this cannot be overstated - the recommended actions outlined in the next section will have little impact if support from the municipalities is not present.

The next two sections outline the recommendations from the study, and give an overview of the recommended implementation plan.

2. RECOMMENDATIONS AND CONCLUSIONS

2.1 The By-Law Process - Conclusions

2.1.1 The Public Views By-Laws As Less Serious Than Other Laws

Over the years the public in Alberta has taken to view municipal by-laws with a lack of respect. While the public does not in most cases deliberately violate by-laws, it does regard such a violation as far less serious than a common assault, for example.

2.1.2 Enforcement of By-laws Is Ineffective

A high percentage (55% in one sample) of persons charged with By-law infractions do not appear in court. One other sample showed only 31% of those charged to actually be fined - the average fine being \$35.

2.1.3 By-laws Are Poorly Drafted and Lack Continuity

Each municipality has its own set of By-laws bearing only passing resemblance to any other set. While the municipal associations and the municipal solicitors do endeavour to establish continuity by providing samples of working by-laws, too often the by-laws may be proven invalid in some respect in court due to poor drafting. The lack of continuity also makes it impossible to establish province-wide precedents, or to have knowledgeable "By-Law Court" personnel.

2.1.4 Consolidation Is Not In Evidence

Coupled with a lack of continuity of By-laws is the plethora of by-laws and amendments resulting from a lack of consolidation. This again confuses the court process - and makes understanding difficult for the Public.

2.1.5 Evidence To Support By-Laws Is Poorly Gathered

By-law enforcement officers are being recruited by the majority of municipalities. Their education and training is varied. In general, they do not know the basis for gathering evidence to support charges in by-law cases.

2.1.6 There Is A Lack Of Continuity In Court Procedures

Judges and prosecutors are not allocated in a formal sense to by-law cases. Nor is there an extensive effort to schedule specific times for by-law cases. These points are only a concern in the cities as the load in other points is too low to even consider. Even in the cities, less than 200 cases per month are heard.

2.1.7 Courts Are Not Overloaded Because of "Moral Suasion"

Municipalities seek compliance with their regulatory by-laws, rather than conviction of those who violate them. Therefore, the principle of "moral suasion" is often used to gain compliance without utilizing a penalizing action - an estimated 95% of

offences are handled this way. The result is a lack of significant court loading - a desirable state and one all wish to maintain.

2.1.8 Municipalities Have Difficulty Collecting From Some Offenders

Even though most citizens pay their fines, there are some "rascals" who choose to not pay. For this reason the municipalities desire stronger powers, and jail as a final sanction.

2.1.9 Increased Fines Would Aid Enforcement

Offenders are rarely fined large amounts, and the maximum fine is \$500. Compliance with regulations could be gained by making an example of an offender by giving out stiff fines - much in excess of \$500.

2.2 The Kirby By-Law Recommendations - Conclusions

Chapter III provides a detailed assessment of the Kirby By-law Recommendations. We shall briefly describe this assessment for each Recommendation, placing it in the form of a conclusion.

- 2.2.1 "Municipal by-law violations should be divorced from a criminal context by being designated as violations and not as offences."

Conclusion

A "semantic" change that may have long-term value but also has a high cost in changing current legislation.

- 2.2.2 "The words guilty or not guilty to alleged by-law violations should be replaced by the words admitted, or disputed."

Conclusion

A "semantic" change that may have long-term value, but it has a high potential for public confusion (if improperly introduced), for an unknown benefit.

- 2.2.3 "Imprisonment for non-payment of fines with respect to violations of municipal by-laws should be abandoned and municipalities should have the powers listed below:

- (a) In the case of violations committed under a by-law under which a defendant holds a licence or permit, a municipality may revoke or suspend any such licence or permit, or withhold the issuance of another new licence or permit, until the fine is paid;

- (b) If the provision of service by the municipality is involved, the municipality may withhold such service until the fine is paid;
- (c) For other violations, a municipality may add the fine to the tax roll of the property involved or collect the fine by a civil process, whichever is deemed appropriate."

Conclusion

- . Imprisonment must be retained as a final sanction.
- . The additional powers are desired, but control systems are needed to prevent abuse, particularly of utility withdrawal.
- . Civil Process is available, but too expensive for normal fine.
- . Withdrawing licences still does not stop violation. Need another sanction beyond this.

2.2.4 "When a qualified inspector certifies that a danger exists because of a faulty installation of gas, electric, or similar outlets, the municipality should be empowered to rectify the faulty installation at the expense of the owner of the property, and to add the cost of such rectification to the tax roll relating to that property. This recommendation is meant to serve as an illustration of other by-laws that might be treated in a similar fashion. Civil remedies should be made available to people subjected to this procedure."

Conclusion

- . A highly supported recommendation.
- . Saskatchewan has similar legislation.
- . Must provide violator a "Right To Rectify".
- . Small municipalities may not have resources available.
- . Could involve liability against municipality.
- . A "Stop Work Order" should also be considered.

- 2.2.5 "In Calgary and Edmonton, by-law violations should be heard on a specified day or half-day of the week."

Conclusion

This can be instituted as part of Hearing Officer process. Also applies to cities like Grande Prairie.

- 2.2.6 "Violations should be heard by a justice of the peace designated for that purpose, and violators should be prosecuted by a special Crown Prosecutor also designated for that purpose. To provide continuity, the same persons should be employed for those duties over reasonably long periods of time."

Conclusion

- . A Justice of the Peace is desired by many due to court load and judges' lack of familiarity with by-laws. But judges are required due to concern for lack of discretionary or legal training.
- . A "Special Crown Prosecutor" is preferred - probably in the form of the City Solicitor.
- . Continuity of personnel is preferred, but impossible to formally commit to. An effort may be made, however.

- 2.2.7 "The power to issue tickets or tags in lieu of laying formal charges, as provided for in Section 115(1)(c) of The Municipal Government Act, should be extended, specifically to the by-laws enacted pursuant to The Planning Act."

Conclusion

This recommendation is out-dated, due to new Acts. The Planning Act does not impede this action.

- 2.2.8 "The maximum fine that may be set under a municipal by-law should be substantially increased so that serious offences can be dealt with in a manner that will have a deterrent effect."

Conclusion

- . The maximum fine should be significantly increased.
- . Judges should levy higher fines.
- . A minimum fine should be set.
- and/or . Specified penalties should be used.

- 2.2.9 "Statutory authority should be given to municipalities to consolidate and revise municipal by-laws."

Conclusion

- . Agreed to as long as there is no power to "revise".
- . Smaller municipalities may need a hand on a one time and ongoing basis.
- . It will be costly - but valuable.
- . Legislation is already being proposed.

- 2.2.10 "Upon such authority being granted, Section 399 of The Municipal Government Act should be amended to permit copies of bylaws, as consolidated and revised, to be received as evidence in any court."

Conclusion

- . A positive step in clearing up administrative overload.

2.3 Recommendations

The following key recommendations are stated briefly. Our recommendations reflect the views of the by-law process participants, modified to fit a workable framework.

2.3.1 By-law Drafting Must Be Improved

Kirby did not deal with the By-law Process outside of enforcement. Our study leads us to recommend that the Government of Alberta address the improvement of the drafting process.

2.3.2 By-Laws Must Be Consolidated

There are too many by-laws and amendments to serve anyone efficiently. A clean-up effort is required to consolidate these and an ongoing process is needed to prevent this situation reoccurring. At the same time, a set of By-law Standards should be considered to provide continuity. Primary concern is the city and large town level.

2.3.3 Court Personnel Should Be More Familiar With By-Laws

There is little evidence of a continued involvement of court personnel with by-law offences. This is only significant in cities. An effort is required to encourage more continuity, hence familiarity. A suggestion is to have City Solicitors act as Prosecutors.

2.3.4 Provincial Legislation Should Be Used For Municipal By-laws

Where possible, provincial legislation should be utilized by municipalities to charge offenders. They have provincial precedents established; a large team of back-up resources; and are familiar to the court personnel.

2.3.5 Terminology Changes and A New Court Should Be Delayed

The impact of the proposed changes (Kirby Recommendations #1, 2 and 6) are not understood by the By-law participants. An effort to ascertain the impact must be made prior to furthering this type of "decriminalization" activity.

2.3.6 The Maximum Fine Must Be Raised

Fines must increase - in their average levy - and the maximum must be substantially raised.

2.3.7 The Recommended Powers Are Needed - But With Caution

The powers indicated in Kirby Recommendations #3 and #4 are valid and valuable - but an effective control must be on their application by the municipalities. Saskatchewan, for example, should be consulted re: this process and re: the legislation currently in force.

2.3.8 A Stop Work Order Should Be Studied

Even the new powers will not prevent certain people from continued violation. A Stop Work Order (by order of a Committee of Council) seems desirous versus a time consuming injunction, particularly in construction related offences. The addition of a per diem charge for continued violation should also be considered.

2.3.9 The Changes Must Be Addressed To A Framework

The next section describes a recommended Implementation Plan. It suggests an organizational framework as well as a sequencing of implementation activity. Whether this be the final approved plan or not, it is critical to continue within some form of framework parallel to that described.

3. A PLAN TO IMPLEMENT THE MUNICIPAL BY-LAW RECOMMENDATIONS

3.1 Implementation Should Follow a Specified Framework

It is important to the successful implementation of the recommendations contained within this report that a framework be followed. This is necessary to ensure:

- the co-ordination of the several participants in the by-law process.
- the proper sequential execution of the possible tasks
- the quality of the implementation effort.

The framework suggested by the consultants, and supported by the Working Committee, is indicated on the facing page. Its primary features include:

- decision as to the implementation direction by a Joint Committee of the Attorney General and Municipal Affairs
- separation of implementation activities into two categories: Current Value, and Longer Term Value.
- grouping of implementation actions within each category.

CURRENT VALUE

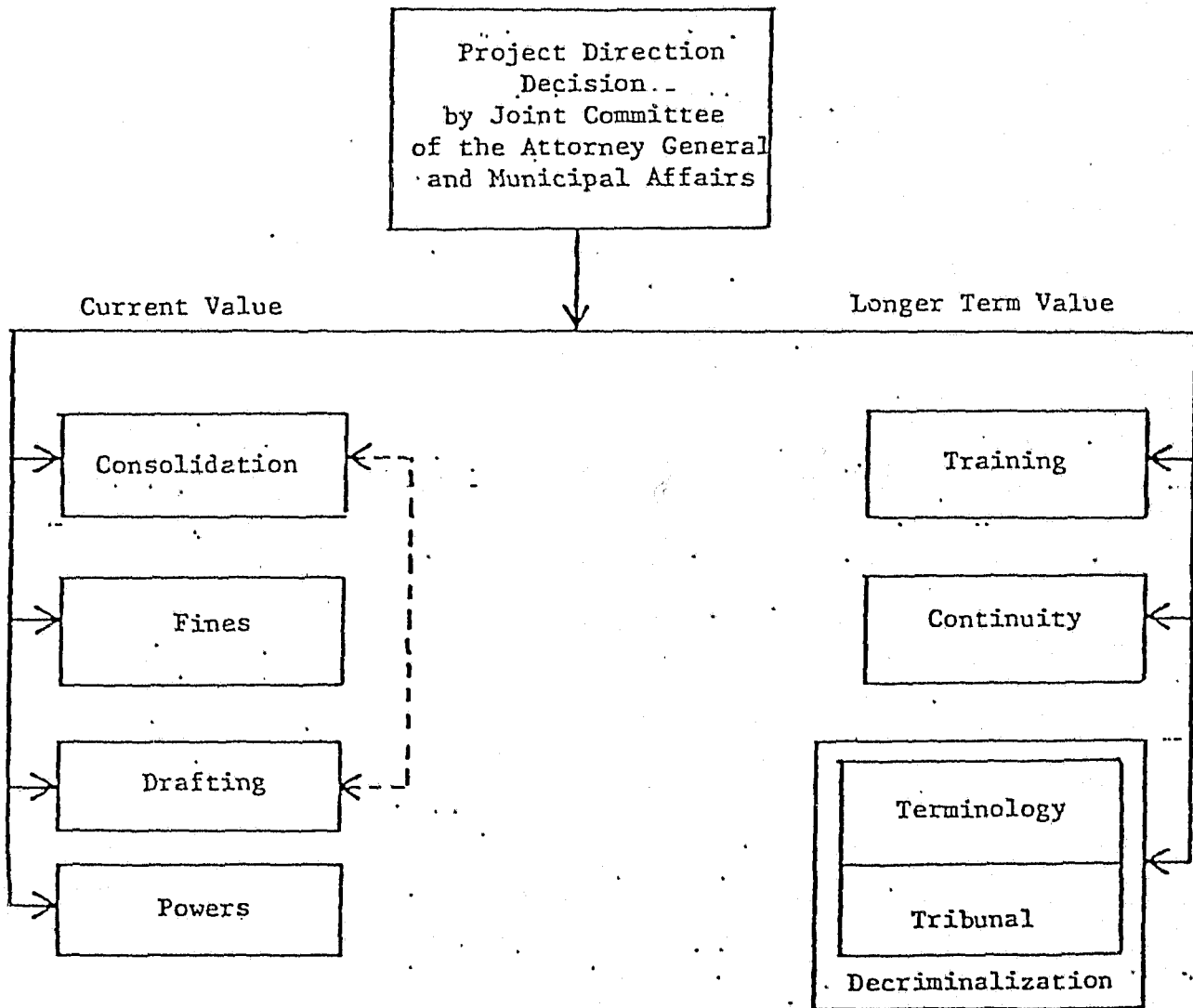
- consolidation
- fines
- drafting
- powers

LONGER TERM VALUE

- training
- continuity
- decriminalization

OVERVIEW OF IMPLEMENTATION PLAN

MUNICIPAL BY-LAW STUDY



3.2 An Implementation Organization Is Required

In addition to providing a framework for defining and executing the implementation activities, an implementation organization should be struck for the duration of the project to ensure continuity and completeness. The organization will be staffed by personnel from various departments, agencies and participants in the by-law process. The implementation activities should not occupy these individuals full-time, but adequate time should be allocated to ensure that implementation does not suffer due to lack of resources.

The exhibit on the facing page illustrates the proposed organization. Its primary features are:

- the Joint Committee of the Attorney General and Municipal Affairs will initiate the project and monitor its progress. It is their role to rationalize any policy and responsibility issues that arise.
- the Project Director, while not a full-time position, will provide the ongoing focus for the project and is responsible for the co-ordination of all task teams.
- each of the tasks or activities within the project will be assigned a Team Leader and team members from various departments and agencies, the selection being made on the basis of applicable knowledge.

IMPLEMENTATION ALTERNATIVES

ACTIVITIES		ALTERNATIVES (* CHOSEN)			REASON FOR (BENEFIT FROM) CHOICE	COST * (Man Weeks)
		1	2	3		
I. Project Direction Decision						
	1. <u>Project report approval</u>	DO*	--	--	Required to initiate implementation tasks "AG" is Attorney General NOTE: "MA" is Municipal Affairs	1
	2. <u>Responsibility clarification</u>	DO*	DON'T	--		
	3. <u>Task assignment</u>	AG	AG/MA*	OTHER		
II. Short Term Value Tasks						
Consolidation	1. <u>Prepare Consolidation process</u>	DO*	DON'T	--	Improves effectiveness of Court process and increases public awareness	2
	2. <u>Prepare consolidated by-laws</u>	DO-100%	DO-PHASED*	DON'T		6 **
Fines	3. <u>Establish maximum fine level</u>	DO*	DON'T	--	Maximum is out-of-date	1
Drafting	4. <u>Establish and implement specified penalties</u>	DO-100%	DO-PHASED*	DON'T	Utilize hearing officers v.s. Court	2
	5. <u>Consider provincial legislation applicable/preferable to municipal by-laws</u>	DO*	DON'T	--	Increase credibility of by-laws through Province wide application	3
	6. <u>Develop by-law standards process</u>	DO*	DON'T	--	Provide assistance to smaller municipalities; improve credibility	4
	7. <u>Provision of by-law drafting consultive service</u>	DO*	DON'T	--		
Powers	8. <u>Draft and pass legislation for new powers</u>	DO*	DON'T	--	Force compliance to by-laws	-
	9. <u>Consider new views of "Jail" as sanction</u>	DO*	DON'T	--	Ultimate sanction without common stigma	2
	10. <u>Study (& implement) process for rectifying dangerous situations</u>	DO*	DON'T	--	Danger to public life and control of Corporate offenders	4
	11. <u>Study utilization of a "stop work order"</u>	DO*	DON'T	--		
III. Longer-Term Value Tasks						
Decriminalization						
	1. <u>Consider the change of terminology and introduction of justice of the peace (tribunal) as impacts the longer term</u>	DO*	DELAY	DON'T	There should be differentiation between a "crime" and "regulation" for the public. These changes may further streamline the by-law enforcement process from the public view. (Based on Law Reform Commission)	8
Training	2. <u>Develop a by-law enforcement training program: role; evidence</u>	DO	DELAY*	DON'T	Improves rate of conviction and image in the long run.	1
	3. <u>Prepare a familiarization session for court officials</u>	DO	DELAY*	DON'T	Improves understanding of by-laws over time	1
Continuity	4. <u>Develop a scheduling system for by-laws</u>	DO	DELAY*	DON'T	Marginally improves large city efficiency. Aids in proper execution of by-law justice	2
	5. <u>Consider using city prosecutors</u>	DO*	DELAY	DON'T	Increases likelihood of evidence and case being presented in proper perspective	2
* Task Force Staff only. No time shown for Committee time.						
** Lawyers estimate is \$200,000.00						

- the Task teams will have available to them Resources from each of the involved departments and agencies. They will normally be asked to provide input on a Working Committee basis, or as part of their normal role to execute specific assignments.

3.3 A Cost-Benefit Analysis Was Used To Select Implementation Activities

Each of the implementation activities suggested by the analysis of the Kirby Recommendations and of the problems with the By-law Process was evaluated to see if it should be undertaken fully or partially; whether it should be delayed; or whether it should be not undertaken at all. The evaluation was done within a cost-benefit framework that emphasized the incremental manpower effort required to implement the activity versus the sociological or intangible benefit that the activity was viewed to yield. There was no indication for any of the proposed activities of there being any tangible dollar savings. This is due to the very small load (less than 6% in one Edmonton sample) that by-law (regulatory) offences place on the court system presently, making any potential savings nearly impossible to identify per se.

The exhibit on the facing page is the summary of the cost-benefit analysis performed. One point merits clarification:

PROJECT KIRBY MUNICIPAL BY-LAW RECOMMENDATION STUDY OVERVIEW OF IMPLEMENTATION PLANS

PROJECT		OVERVIEW OF IMPLEMENTATION PLANS		MONTH																															
ACTIVITIES		STAFF	(*Responsible man)	1	2	3	4	5	6	7	8	9	10	11	12	14	16	18	20	22	24	26	28	30	32	34	36								
I. Project Direction Decision		AG/MA																																	
	1. Project report approval	AG/MA																																	
	2. Responsibility clarification	AG/MA																																	
	3. Task assignment	AG/MA																																	
II. Short Term Value Tasks																																			
Consolidation	1. Prepare Consolidation process	*MA/LR																																	
	2. Prepare consolidated by-laws	*MA/AG																																	
Fines	3. Establish maximum fine level	AG(LR)																																	
	4. Establish and implement specified penalties	*MA/LR																																	
Drafting	5. Consider provincial legislation applicable/preferable to municipal by-laws	*PR/LR																																	
	6. Develop by-law standards process	*MA/LR/CJ																																	
	7. Provision of by-law drafting consultive service	*MA/CJ																																	
Powers	8. Draft and pass legislation for new powers	*MA/LR																																	
	9. Consider new views of "Jail" as sanction	*PR																																	
	10. Study (& implement) process for rectifying dangerous situations	*PR/MA/LR																																	
	11. Study utilization of a "stop work order"	*PR/MA/LR																																	
III. Longer-Term Value Tasks																																			
Decriminalization	1. Consider the change of terminology and introduction of justice of the peace (tribunal) as impacts the longer term	*PR																																	
	2. Develop a by-law enforcement training program; role; evidence	*MA/CJ																																	
Training	3. Prepare a familiarization session for court officials	*PR/MA																																	
	4. Develop a scheduling system for by-laws	*PR																																	
Continuity	5. Consider using city prosecutors	*MA/CJ																																	
NOTE: ALL TASKS MUST BE OVERSEEN BY JOINT COMMITTEE OF ATTORNEY GENERAL AND MUNICIPAL AFFAIRS																																			

AG - ATTORNEY GENERAL
LR - LEGAL RESEARCH
PR - PLANNING, RESEARCH & DEVELOPMENT
CJ - CRIMINAL JUSTICE
MA - MUNICIPAL AFFAIRS & MUNICIPAL ASSOCIATIONS

DEPENDENCE

- the estimate for lawyers fees for consolidating the by-laws of the Alberta municipalities (\$200,000.) is a very rough and preliminary number, given only to indicate the magnitude of the effort involved. The consultants suggest a phased approach to this task, the first phase being to cost out the legal input required and to develop a plan for doing consolidation across Alberta, ie., it is assumed that only larger municipalities will be involved initially, and that smaller municipalities will become involved over time.

3.4 An Implementation Plan Has Been Suggested

The exhibit on the facing page represents an overview of the suggested implementation plans. The detailed description of the steps within each task are contained in the main body of the report. Several features of the plan should be noted:

- several tasks have dependent relationships with other tasks.
- the consultant has suggested what appears to be a reasonable assignment of responsibility and of other primary interest groups, for each task.
- the timing is laid out beginning with the approval of this report by the Joint Committee of the Attorney General and Municipal Affairs. It is critical that the responsibility and task assignment activities be completed to both parties'

satisfaction prior to beginning implementation activities.

- the timing of the implementation activities is not necessarily required to reflect that indicated on the suggested plan. While the task interdependence should be maintained, the nature of the tasks and their value to the organizations allows considerable flexibility in their execution.

END