To whom it may concern,

As a preamble, I observe this consultation's usefulness was limited because of the complexity of the matters in question. More background on what municipalities have sought in the past and what the provincial government would like to suggest would have helped focus discussion. This lack of information may help to account for the relatively small number of submissions to date. I hope therefore there will be further opportunities for public consultation once it is more clear what is at stake.

Here are some initial proposals:

1) Regionalisation

The act should be written in such a way that enables and encourages regional government.

2) Jurisdiction

Municipalities or regional bodies where established should be given primary responsibility for the provision of library services and for the provision of public transit where the latter is practicable. Minimum standards for both of these should be set provincially, however, and provincial funding should be provided to help communities without adequate fiscal resources to reach these standards. In particular legislation should be written in such a way that a regionally-controlled public transit body could (and should) take over the running of Metrobus in St John's to enable a more effective spread of public transit in the NE Avalon region.

Cities should also have greater control over traffic and parking matters within their boundaries to aid their planning. To that end I also endorse the amendments to the St John's Act suggested by the NLAPP advocacy committee.

3) Democratic reform

Please include the Municipal Elections Act in your upcoming and act upon the calls to action of the Citizens' Assembly for Stronger Elections, all of which I have reviewed and endorse. In addition require municipalities and regional bodies to publish council meeting agendas and minutes online and if necessary provide funding and support to enable this to take place.

4) Revenue tools

Municipalities and regions should have a greater variety of revenue-raising tools at their disposal. Property tax is regressive and ties revenues to a fluctuating property market which introduces un-necessary uncertainty. I would encourage municipalities to switch to a progressive local income tax and the act should make this choice available.

Regards,	
Dr David Brake	