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The Island Regulatory and Appeals Commission

Form MGA-MR-2

Objection to a Proposal to Establish, Restructure, Dissolve a Municipality

Pursuant to the Municipal Government Act R.S.P.E.I. 1988, CAP. M-12.1., Sec. 17, and the Principles, Standards and Criteria Regulations

Completing your Application: Important Information

- ✓ An objection to a proposal to establish, restructure or dissolve a municipality may be made by any person by filing a written objection in the form approved by the Minister to the Island Regulatory Appeals Commission (IRAC) within 30 days after the latest of the following dates:
  - The dates noted below in respect of a person to whom the Commission is required under to provide a copy of the proposal under section 16 of the *Municipal Government Act*;
  - The date of publication of the notice in a newspaper; or
  - The date of posting of the notice in the affected area.
  
- ✓ Any person may object to a proposal to establish, restructure or dissolve a municipality within:
  - 30 days after the date that a copy of the proposal required to be provided to a person under the Act is received by that person;
  - 30 days after the date a copy was either given or left for a person with the person authorized to accept documents on behalf of him or her; and
  - 30 days after the date the document was sent by mail to the person (deemed to be received by the person ten days after the date on which it was sent).

Part 1: Declaration of Objection:

I/We object to the proposal to establish Greater Three Rivers Area

The proposal was dated on or about April 17, 2018

Part 2: Reason for Objection:

Describe the reason(s) for objection: please see attached pages

**Part 3: Objection to a Proposal to Establish, Restructure, Dissolve a Municipality Filed by a Municipality** (This section must be completed only if the objection is being filed by a municipality).

This objection is submitted by the Municipality of Montague

**Note:** If objecting as a municipality, a copy of the resolution by council approving the objection must be attached.

**Part 4: Contact Information**

Signature

Jill Walsh

[Signature]

Print Name

Sign Name

Address: PO Box 546, Montague COAIRO

E-Mail: jwalsh@montaguepei.ca Phone: (819) 838-2528(c)

**Part 4: Submission Information**

This completed form may be submitted for consideration to:

Prince Edward Island Regulatory and Appeals Commission (IRAC)  
P.O. Box 577  
Charlottetown PE  
C1A 7L1

Phone: 902-892-3501  
Toll-free (for area code 902) 1-800-501-6268  
Email: proposal@irac.pe.ca

Personal information of applicant(s) on this application is collected under the *Freedom of Information and Protection of Privacy Act* of PEI, Section 31(c), as it is necessary for processing this application of Objection to a Proposal to establish, restructure or dissolve a municipality.

<b>Office Use Only</b>
Date received:
Date deemed received:

The Town of Montague (the Town) hereby files an objection to the application for the formation of a new municipality of Greater Three Rivers area (the application). The reasons are:

1. that the inclusion of the Town of Montague in the proposal after the Town decided not to be involved violated the Municipal Government Act and the Interpretation Act, and
2. the documentation attached to the application does not constitute a proposal under the Municipal Government Act and the Principles, Standards & Criteria Regulations.

***Proposal Violates the Rights and Responsibilities of the Town of Montague under the Municipal Government Act***

Firstly, the proposal which accompanied the application (the proposal) is in violation of the Municipal Government Act (MGA) and should be dismissed forthwith.

The Town of Montague is, and has been since 1917, an incorporated Town in its own right.

Section 4 of the MGA states that “*a municipality is a corporation and has...all the rights and liabilities of a corporation as set out in the Interpretation Act RSPEI 1988, Cap I-8*”.

Section 16 of that Act states “*words in an enactment establishing a corporation shall be construed to vest in the corporation power...to regulate its own procedures and business...*”

The Province further recognizes that power in the preamble upon which the MGA is based, where in the first paragraph, section (d) recognizes “*the importance of the Government of Prince Edward Island and Prince Edward Island’s municipalities respecting each other’s authority*”, and section (e) refers to *the importance of the Government of Prince Edward Island and Prince Edward Island’s municipalities consulting on matters of mutual interest*.

The Town seeks to have the Province of Prince Edward Island recognize the authority with which the decision to opt out of amalgamation was made. That decision was not taken lightly, and reflects a serious concern about the lack of consultation with the Town throughout the process. Information was not shared as discussions proceeded, and thus, feedback and legitimate concerns were not obtained or considered.

In the preamble’s second paragraph, section (b), the Province recognizes that municipalities require “*flexibility in order to address differing needs in municipalities*”.

Flexibility to a municipality that may be forcibly included in amalgamation means exiting the process and charting its own course. The proposal under consideration shows no respect for the authority of the existing municipalities, which have differing needs than the applicant communities, and have decided against amalgamation.

The application contravenes the tenets upon which the entire MGA is based, as well as section 86(2)(a), of the MGA, which states that “*a council may exercise the powers and shall carry out the duties and functions expressly given to the council under this or another Act.*”

On February 26, 2018, the duly elected Council of the Town, at a duly constituted meeting, considered and defeated a resolution to “participate in the application for amalgamation and annexation, as proposed in the Three Rivers proposal.” In defeating the resolution, the Town decided against further involvement with the amalgamation process.

For over 100 years this municipality has had and exercised the authority to determine and govern its own affairs, not the least of which are the state of its own existence and the control of its assets.

However, in March, 2018, in contravention of the legislation cited previously, the application was made to include the Town of Montague in an amalgamation and annexation which would result in the town of Greater Three Rivers Area (GTRA).

The Town does not consent to its inclusion in the new municipality. Whereas the Government of PEI recognizes in the MGA the authority of the Town by virtue of the Interpretation Act, and the Town officially decided against participation in the application, the Town of Montague objects to the application including Montague in Greater Three Rivers Area.

### ***Document Attached to the Application does not Constitute a Proposal***

(It is appropriate to note that the MGA (s.261(1)(a)) refers to principles, standards and **additional** criteria which may be made without limiting the generality of the preceding parts of the Act. For clarification, the MGA s.15 is in force and the Regulations do not negate it by not referring to it.)

For many reasons, and in a variety of ways, the document attached to the application does not constitute a proposal.

The document is confusing and unclear, and contradicts itself. The lack of sequential page numbering provides an indication of the incongruity of the document. On page 41 (p. 4 of the section entitled *Stronger Together: Building a Sustainable Future for the*

Three Rivers Region (Stronger Together), the proposal states “no community is obligated to participate”, yet all the communities included in Stronger Together, even those which opted out, are included in the application. The Town of Montague is being obligated to participate.

### **Proposal Must Include Plan for Services**

In clause 15 (5)(d)(vi), the MGA requires that a proposal include the services to be provided by a municipality. The discussion of services in this document takes place over several sections, some of which offer conflicting information, and is not brought to a conclusion. To reiterate, the proposal contains many separate references to services and variations of services, but does not list or stipulate which will be provided.

On the application, the list of services is indicated to be “all as required under the Act and as outlined in the proposal.” The first part of that response, “all as required under the Act”, includes (s. 14) fire protection, municipal planning services, and emergency measures planning.

Fire protection is not provided for in the proposal. The Town of Georgetown and the Village of Cardigan own fire protection equipment that is not included on the list of assets to be transferred to the GTRA on page 127 (p. 20 of Information Prepared for Three Rivers Steering Committee). Clause 15(5)(d)(vii) of the MGA requires a complete list of the assets of the proposed municipality. The fire-fighting assets are not there. Where the ownership of those presently-existing assets will reside is not stated. A new ownership structure is not defined, nor is whether the anticipated owners have agreed to provide service on behalf of GTRA.

Regarding fire protection in the area presently served by the independent Montague Volunteer Fire Brigade, no arrangements have been made for the continuation of service by that department for a new municipality. The goodwill and cooperation of volunteers throughout the region cannot be taken for granted, and must not be evaporated through a clumsy transition process, and yet the proposal does not confirm the continuation of the existing relationship or present an alternative arrangement. Mutual aid agreements presently in place between the three existing fire departments, and contracts for provision of services, must be examined, and renegotiated and ratified if necessary, before action is taken to dismantle the existing services.

Municipal planning services are not presently offered in the entire area under consideration for the GTRA. The application does not address when an official plan and development bylaw will be in place, but IRAC is expected to consider that time frame

under the Principles, Standards & Criteria Regulations of the MGA (the Regulations), s.9(c).

Similarly, IRAC is directed by s.9(d) of the Regulations to consider when the municipality will comply with requirements for emergency measures planning, and the proposal does not supply a time frame.

“All as required under the Act” are three services, and their provision has not been fully addressed in the proposal.

The second part of the statement regarding the provision of services: “all [services] ...as outlined in the proposal” leads to an attempt to ascertain what the services are that are outlined in the proposal. (For the sake of reference, the pages have been numbered on the proposal. Starting with page 1 as the first page of the application to establish a municipality, the whole document obtained by clicking “Greater Three Rivers Area Municipality Proposal” on the IRAC website was numbered in order through to page 208. The references to services include:

- p.17—planning and emergency measures
- p. 20—economic development, planning, recreational facilities
- p. 21—administration, planning, fire protection
- p. 23—planning, bylaw enforcement, recreation, medical services, retail & professional services, services for seniors and youth
- p. 24—sewer & water
- p. 32—fire services and recreation
- p. 33—recreation, wharves, schools, fire services, economic development
- p. 46-47—fire protection, schools, hospital, medical, dental, retail, service shops, professional offices, recreational facilities and programs
- p. 55-63—sidewalks, water & sewer, schools, health care, recreation, business services, administration, planning, street lights, fire protection, police protection, recreation, culture
- p. 71—planning, recreation, community policing, economic development
- p. 76—planning, economic development, recreation, administration
- p. 86—community police force, recreation director, development officer
- p. 88—planning, community police force, recreational, administration
- pp 108-124—administration, economic development, planning & bylaw enforcement, one RCMP officer, streets, street lights & sidewalks, recreation & culture, community centres, pest control, special events
- p. 142, p. 168—one RCMP officer, economic development, planning & bylaw enforcement, recreation, pool complex, streets, street lights & sidewalks
- p. 188—planning, economic development, recreation
- p. 202—planning & bylaw enforcement, recreation, economic development

p. 204—one RCMP officer, economic development, planning, bylaw enforcement, recreation & culture, street lights, sidewalks, pool  
p. 206—planning, economic development, recreation

This divergent list is nowhere addressed or reconciled, and some items contradict one another. Because no set of financial projections in the proposal includes all the services outlined above, it is apparent the proposal does not include them all. A proposal must state which course of action is being proposed for implementation.

The statement made in answer to question 7 on form 1-15 is not accurate.

IRAC, under the Principles, Standards & Criteria Regulations, is required to assess whether the proposal includes information respecting (s. 11(b)(iii)(C)) *...where an expansion of municipal services to the unincorporated area is proposed, a service delivery plan...*” and, in s. 11(b)(iii)(D) *“where an expansion of municipal services to the unincorporated area is not proposed, the reasons why an expansion...is not warranted”*. The proposal does not make clear which services are or are not being extended to the unincorporated area.

### **Comparable Taxation for Comparable Services**

Whatever the services that are intended for the GTRA, it is apparent that sidewalks and street lights, and possibly black fly control, (and streets, in the sections that include Georgetown) are the only services funded by property taxes that are specific to certain areas. Planning, emergency measures, economic development, recreational programs and facilities, administration, fire protection, bylaw enforcement, medical services, retail and professional services, services for seniors and youth, wharves, schools, hospital, dental, service shops, business services, police protection, culture, community centres, special events, and the pool complex can all be reasonably expected to be available equally to all citizens of GTRA.

There is a major flaw in the way the projected tax rates have been calculated, which is not based on costs of services. Obviously, all the citizens enjoying equal access to the services should share equally in the cost of providing them. Citizens with access to more specific services, such as street lights and sidewalks, should pay a premium based on the cost of those additional services. Tax rates in an area must change when service levels change.

Black fly control is a presently-existing, localized service which is not clearly addressed in the proposal. On page 124 (p. 17 of *Information Prepared for Three Rivers Steering Committee*), pest control is included as an “other municipal service”. There is no

statement about whether this service will be provided consistently across the GTRA. Again, if it is a localized service, extra tax should be charged to those who benefit from the service.

No mechanism is discussed to deal with the inevitable issues of taxpayers seeking services not provided in their locale. It is crucial that any proposal to be implemented define the cost of services, and base the tax rates on the services received by the taxpayer, with the sure knowledge that rates will change as levels of service change.

This principle is evident throughout the discussion in the proposal, but does not appear in the forecast tax rates. On page 87 (p. 49 of *Stronger Together*), the proposal states "...within a single integrated regional municipality, tax rates should reflect the level of services being provided and also that those receiving a similar level of service should be paying similar tax rates." On page 77 (p. 39 of *Stronger Together*), the proposal discusses tiered rates and states that "each property owner only pays for the actual services they are receiving". Nowhere is there any rationale or justification for charging taxpayers in one section of the GTRA a higher rate for services to which they have equivalent access as other taxpayers being charged a lower rate.

### **Related Service**

Services in the Town presently include a centralized water and sewer utility, the costs of which are borne by the ratepayers.

The utility is closely intertwined with, and fully owned by, the Town, yet its assets are not included on the list of assets of the proposed municipality on page 127 (p. 20 of *Information Prepared for Three Rivers Steering Committee*). Future ownership and operation of the utility are not discussed in the proposal. The Town and the utility share employees, equipment, and management. It is not expedient for the operation to face a transition period while management and personnel issues are sorted out—a clear plan is vital. Intentions must be defined—the presence, or absence, of potential for sharing of resources under the GTRA must be clear. If the utility's operations are going to be severed from the municipality, there is likely to be a significant impact upon the utility's rates as it replaces shared staff and other resources with a stand-alone operation. The new structure for the utility will significantly impact future rates and the burden carried by taxpayers in Montague (who are also the ratepayers for the utility).



### **Proposal in Conflict with Map**

The MGA, s. 15(5)(d)(iii) requires that a proposal contain “*a map depicting, in detail, the new boundaries being proposed*”. The map depicts, and the application states, that the proposal is that all the area served by any of the Montague, Georgetown, or Cardigan fire departments be brought into the GRTA. At least 27 pages from pp. 180-207 omit Georgetown from the discussion and calculations. The communities the proposal purports to include are not consistent: there are at least two different variations in the document attached to the application.

### **List of Assets does not Support Proposal**

As previously discussed, the list of “*all the existing or proposed capital assets of the proposed municipality*” required by the MGA in s. 15(5)(d)(vii) does not include all the assets of the existing municipalities. Either the list is incomplete or the future delivery of the services now being supplied with those assets needs further discussion.

Of the assets included on the list on page 127 (p. 20 of of *Information Prepared for Three Rivers Steering Committee*), Montague is the present owner of over 80% of them. Over \$12 million of the less than \$15 million in total assets has been paid for by the taxpayers in Montague. Taxpayers coming into the GTRA and taking ownership as full partners should expect to pay a sum toward the capital cost of those assets, in addition to an equal share of the operating costs.

### **Proposal Fails to Demonstrate Financial Viability Required under the Regulations**

Clause 2(b) of the Principles, Standards & Criteria Regulations requires IRAC to consider “*whether the proposed municipality is likely to be financially viable*”. Clause 10(b)(ii) requires IRAC to consider *whether the proposal...includes in the financial plan referred to in clause 9(f)...*, and the 9(f) referred to requires an assessment of whether the proposal “*includes a financial plan that demonstrates the financial viability of the proposed municipality*”.

The financial projections included with the proposal all include revenue of large, and rather doubtful, amounts of funding from the provincial government. Page 110 (p. 3 of *Information Prepared for Three Rivers Steering Committee*) provides a summary of one such wish list, with the statement that the Province has not yet committed to providing the funds. This set of financial projections contains transitional funding totalling \$1.02 million over five years. As provincial administrations rise and wane, and priorities

change, the only possible way to ensure that will be received is to obtain it prior to amalgamation.

The proposal also confidently predicts an exception to the long-awaited revenue sharing agreement will be made for GTRA. If the Province was ever to circumvent an agreement that was years in the making and includes all the towns and cities on PEI, and provide funding at the level budgeted, there is no guarantee that such an arrangement could survive any length of time. Rather, there is an agreement in writing, with ten signatory municipalities that are not included in the proposal, which says equalization works according to an established formula that determines the level of funding to any and all towns and cities. The basic premise of equalization is that it enables municipalities to provide comparable levels of service at comparable levels of taxation. The proposal under consideration does not even purport to provide comparable levels of taxation across the GTRA, and it is most unlikely that the Province will agree to subsidize an artificially low tax rate for some residents of GTRA who will receive services as discussed previously.

The proposal assumes the GTRA will be granted gas tax funding, which municipalities are eligible for because they provide sewer and water services, yet the proposal does not include the provision of those services. The document is inconsistent and does not offer one vision.

An impractical projection of revenues from sources other than property tax leads to an unrealistically-low projection for property tax revenue, and hence, property tax rates. The likelihood of financial viability that IRAC is required to assess under the Regulations must consider the likelihood of obtaining and sustaining the funding that the financial projections are based upon. Additionally, artificially low projections for property tax rates create unrealistic expectations, which, when coupled with the political priorities inherent in democratic institutions, will create difficulties in achieving financial viability.

### **Municipal Government Act includes Transitional Provisions**

The MGA includes practical transitional provisions for municipalities that are being restructured. Montague is an existing town, pulled into a complicated proposal which does not easily fit the definitions of the MGA. Restructuring (s.1 (bb) of the MGA) is *“changing a boundary or boundaries of a municipality and includes an amalgamation or annexation, whether of another municipality or an unincorporated area.”* The definition of a new municipality (s.11 (2)(a)) states that *“a new municipality is established when an existing municipality moves from one class... to another...”*

Under this application, the more accurate description for the circumstance of the Town of Montague is a restructuring than a new municipality.

By forcing the Town into an application for a new municipality, the applicants have circumvented the protections within the MGA for existing municipalities. Section 22 of the MGA provides for transitional measures for re-structured municipalities that should prudently be invoked in this situation. The possibility of an interim appointed Council for the Greater Three Rivers Area is an abomination. It is logical and much more desirable that, until a Council can be duly elected for the GTRA, the existing Councils constitute the basis of the transitional one.

The Town is staffed with knowledgeable, experienced employees who have proven their ability to manage the assets and implement the bylaws of the Town. It is not reasonable to expect the Town to give up \$9-16 million in tangible capital assets with no accommodation made for their seamless administration, operation and/or maintenance, but that may be the case with no provision for transitional staffing. Additionally, should staff not be included in the transition, an added expense will be incurred for paying out severance clauses on the staff contracts.

The Town has a working set of bylaws and resolutions. The application would make possible a scenario where bylaws may not be in place for an uncertain period of time, because the transitional provision for existing bylaws would not apply to a new municipality.

### **Other Requirements**

Clause 15(5)(c) of the MGA, and question 3 on form 1-15, call for a proposal to include the name of each adjoining municipality or unincorporated area. This document does not.

The notice posted by IRAC in the newspapers and in public places did not meet the requirements of s.16(5)(b) of the MGA. The requisite brief summary of the contents of the proposal was omitted.

Clause 11(b)(ii) of the Regulations requires IRAC to assess whether the proposal *“includes a process to engage the residents of the proposed municipality in the planning of the future use of the land in the unincorporated area to be annexed”*. It does not.

The statement of community benefits which IRAC is required to consider by clause 11(b)(iv) of the Regulations is rambling and imprecise, as previously noted in the discussion about services.

## Summary

The application is incomplete in that it does not appreciate or address the myriad issues which must be dealt with to effectively implement a change of this magnitude. Many of the needs are recognized by the MGA and its Regulations, which call for measures to mitigate the potential effect.

In summary, IRAC is required by the Principles, Standards and Criteria Regulations to assess:

- whether the proposal includes a transition plan containing measures for the transfer and consolidation of municipal administrations, municipal services, and municipally-owned or operated facilities (s.10(b)(i)) There is no reference in the proposal to any transfer or consolidation or any orderly process.
- (s.11(b)(ii)), whether the proposal includes a process to engage the residents of the proposed municipality in planning for the future use of the land in the unincorporated area under consideration. It does not.
- (s.11(b)(iii)(C) and (D)), whether services are being extended to the unincorporated area or not. There are various statements about various services being provided and/or not being provided, and no service delivery plan that identifies and addresses the timing and phasing of the services to be provided or statement that the services are not warranted.
- (s.11(b)(iv)), the statement of community benefits in the proposal. The application does not offer one statement of benefits, rather it offers a range of opinions and suggestions without committing to any course of action for any particular set of benefits.
- The likelihood of financial viability of the proposed municipality (s.2(b)) Financial projections include equalization and transitional grants from the Province that are not provided for under any established sources and are not substantiated by commitments from the Province. Gas tax direct allocation is projected to be awarded on the basis of population, but sewer and water assets are not included in list of assets the GTRA will assume. Tax rates have been set artificially low. This is not realistic or sustainable.
- Demonstration that the municipality has a vision of the services it intends to provide residents in the immediate and long term (s. 2(e)) The proposal demonstrates that the proposed municipality has an assortment of services and service levels that it has considered or is considering, but does not define a vision of any one set of services.
- when the proposed municipality will comply with s.14(b) and 14(c) of the MGA (s.9(c) and (d)). This is not addressed in the proposal.

In addition, the provisions and requirements of the Municipal Government Act, such as:

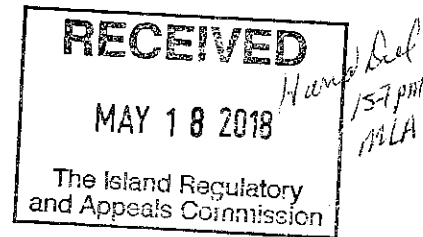
- Powers of a municipality (s. 4)
- Duties of an elected Council (s. 86(2)(a))
- Provision of fire protection (s.14(a))
- The inclusion of a list of adjoining municipalities or unincorporated areas (s.15(5)(c))
- The inclusion in the proposal of the services to be provided by the proposed municipality (s.15(5)(d)(vi))
- A listing of all the existing or proposed capital assets of the proposed municipality, including infrastructure (s.15(5)(d)(vii), MGA)
- The public notice of the proposal must include a summary of the contents of the proposal (s.16(5)(b), MGA)

have not been fully respected. In all the foregoing respects, the application is incomplete.

The Town objects most strenuously to the application. The Town does not consent to its inclusion in the new municipality. Whereas the Government of PEI recognizes in the MGA the authority of the Town by virtue of the Interpretation Act, and the Town officially decided against participation in the application, the Town of Montague objects to the application including Montague in Greater Three Rivers Area. Furthermore, the Town of Montague objects to the incomplete proposal receiving consideration by the Island Regulatory and Appeals Commission and/or the Minister of Communities, Land and Environment because it is in violation of the Municipal Government Act and its regulations.

## Town of Montague

### Resolution



Moved by Deputy Mayor Mabon, seconded by Councillor Johnston that:

*Whereas the Town of Montague is a recognized municipality under the Municipal Government Act of PEI, and*

*Whereas the Municipal Government Act vests in a municipality “all the rights and liabilities of a corporation as set out in the Interpretation Act”, and*

*Whereas the Interpretation Act states that “words in an enactment establishing a corporation shall be construed to vest in the corporation power...to regulate its own procedures and business...”, and*

*Whereas the Council of the Town of Montague, at a duly constituted meeting on February 26, 2018, considered and defeated a resolution to “participate in the application for amalgamation and annexation, as proposed in the Three Rivers proposal”, and*

*Whereas by defeating the resolution, the Town decided against further involvement with the amalgamation process, and*

*Whereas an application to forcibly include the Town of Montague in the establishment of a new municipality of Greater Three Rivers Area was submitted to the Province of PEI in March, 2018, by neighbouring municipalities,*

*Therefore be it resolved that the Town of Montague objects to the application to establish the municipality of Greater Three Rivers Area on the basis that it contravenes the right and responsibility of the Town to govern its own affairs as set out in the Municipal Government Act and the Interpretation Act, and furthermore,*

*Whereas the Municipal Government Act and the Principles, Standards and Criteria Regulations specify criteria for the contents required in a proposal to establish a new municipality as a town by a restructuring of the boundaries of two or more municipalities that includes a concurrent amalgamation and annexation of an unincorporated area, and*

*Whereas the criteria which have not been met in the proposal accompanying the application for the establishment of Greater Three Rivers Area include:*

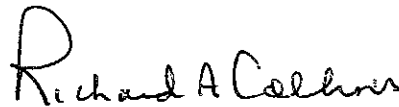
- *Clause 14 (a) of the Municipal Government Act*
- *Clause 15(5)(c) of the Municipal Government Act*
- *Clause 15(5)(d)(vi) of the Municipal Government Act*
- *Clause 15(5)(d)(vii) of the Municipal Government Act*
- *Clause 16(5)(b) of the Municipal Government Act*
- *Clause 10(b) of the Principles, Standards and Criteria Regulations*
- *Clause 11(b)(ii) of the Principles, Standards and Criteria Regulations*

- *Clauses 11(b)(iii)(C) and (D) of the Principles, Standards and Criteria Regulations, and*
- *Clauses 11(b)(iv)(C) and (D) of the Principles, Standards and Criteria Regulations,*

*Therefore be it further resolved that the Town of Montague objects to the application to establish the municipality of Greater Three Rivers Area on the basis that the documentation submitted with the application does not constitute a proposal as defined by the Municipal Government Act and its regulations.*

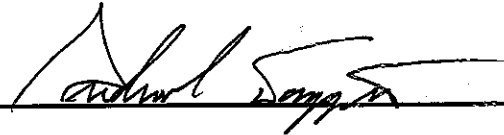
Motion Carried Unanimously

I hereby certify the above to be a true copy of a resolution duly passed by the Town Council for the Town of Montague at a meeting held on the 14<sup>th</sup> day of May, 2018.



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**Richard A. Collins**  
Mayor



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**Andrew Daggett**  
Chief Administrative Officer