

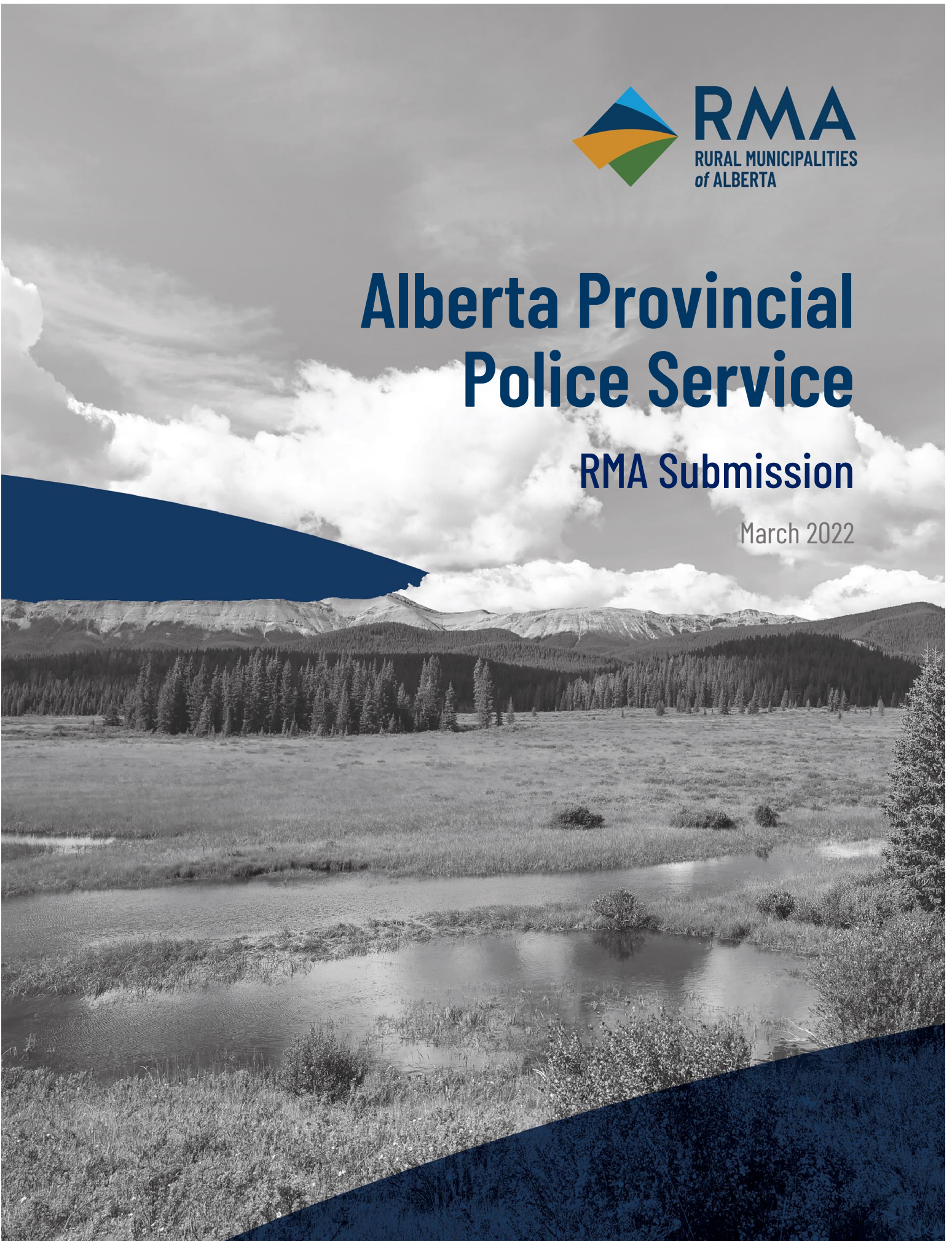


RMA
RURAL MUNICIPALITIES
of ALBERTA

Alberta Provincial Police Service

RMA Submission

March 2022



About the RMA

The Rural Municipalities of Alberta (RMA) advocates on behalf of Alberta's rural municipalities. RMA's members consist of 63 municipal districts and counties, five specialized municipalities, and the Special Areas Board. RMA members provide municipal governance to approximately 85% of Alberta's land mass; Alberta is unique in Canada in that municipalities govern land throughout the entire province, from border to border. While villages and small towns are spread across rural Alberta, these are considered urban municipalities and are not represented by the RMA. The RMA's 69 members have several common traits: large land masses, small populations, and a lack of a traditional "population center."

About this submission

This submission is being provided to the Ministry of Justice and Solicitor General (JSG) to provide RMA's concerns regarding the proposed Alberta Provincial Police Service (APPS). This input is meant to provide details about why RMA opposes the creation of an APPS. At RMA's Spring 2022 Convention, members endorsed resolution 4-225: Continued Support for the Royal Canadian Mounted Police in Alberta. The resolution calls for RMA to advocate to the Government of Alberta to not proceed with a Provincial Police Service, and provides clear direction for RMA to make this submission.

RMA has previously remained neutral throughout the engagement process conducted with municipalities by JSG. To date RMA's feedback has been to identify gaps in the proposal or ask questions to learn more about the proposal. As JSG has not addressed these gaps or questions, RMA has chosen to oppose the APPS transition based on the following:

- ◆ It has not been demonstrated that this move will improve the level of police service for rural Albertans;
- ◆ There is no evidence that the transition will enhance local community input into policing; and
- ◆ The Government of Alberta has failed to demonstrate the move will be cost neutral to all municipalities.

This submission is divided into the same themes used in JSG's municipal engagement sessions to identify specific areas of concern or opposition to various aspects of the proposed transition.

Governance and Oversight

The proposed model includes the formation of a provincewide governance structure outlining the role of the Government of Alberta, a provincial chief of police, an arm's length provincial police commission, several executive level committees, local detachments and specialized service branches, and local commissions comprised of municipal and community representatives.

Provincial commission

Summary

While the review process considered several options for how provincewide governance of an APPS should be structured, the final report recommends creating the APPS as an arm's length agency governed by a ministry-appointed police commission. According to the report, this approach will ensure that the APPS operates independently of political interference and will prevent the provincial government from giving direct orders to the APPS, which is allowed in some other jurisdictions.

Given the lack of details regarding how the police commission members will be selected, RMA is concerned appointments to this commission would become political. If members are recruited, selected, and appointed by the Minister, it is a reasonable conclusion that they would be politically like-minded to the governing party. If this is the case, the creation of the commission to prevent political interference in police direction may not be as effective as it was intended to be. RMA is also concerned about the lack of information about how the provincial police commission will be funded and administratively supported.

Furthermore, a provincial-level police commission setting objectives will not be able to take into account the unique characteristics of different communities. In particular, policing rural communities requires a different approach than urban communities.

Questions and gaps

- ◆ Unclear how commission will be politically neutral.
- ◆ Unclear how commission will be funded and administratively supported, and costs associated with it.
- ◆ Challenges in balancing unique rural policing priorities and needs at provincial level not considered.

Role of local policing committees

Summary

The report also states that through this structure, local policing committees will be formed and will have the ability to provide direct input into local policing priorities as well as provincial priorities through communication with the provincial commission. The report recognizes that such committees may not be practical in every municipality and that further research is required to determine the "right" number of committees and the committee structure. The report recommends that the municipality be responsible for determining the structure of the relationship with the detachment based on community need but is silent on if or how municipalities should be financially supported for this responsibility or empowered to require accountability from the local detachment.

RMA is concerned about the lack of detail on the supports for municipalities hosting a local policing commission, as many municipalities will not have the administrative capacity to take on this new role. Building on this,

municipalities should not be required to financially support the operation of local policing committees. Additionally, the report's position that not all municipalities will be involved in a local commission is concerning as this creates disparity in terms of municipal representation in setting local policing priorities.

Questions and gaps

- ◆ Who will decide what municipalities form a police committee and on what criteria will this be based?
- ◆ Unclear how local committees will be funded and what happens if local funding is unavailable.
- ◆ Unclear whether municipalities with police committees will have a higher level of input into policing than those without.
- ◆ Lack of information on extent to which local detachments and provincial police commission will be expected to be accountable to local police committees.

Staffing and Human Resources

The proposed model would see significant changes on the human resources side of policing. While these elements, outside of officer staffing levels, are not typically in the public view, they have a significant impact on service delivery.

Staffing levels

Summary

The transition study uses RCMP staffing levels as of June 2020 as its definition of the "current state." This level serves as the benchmark for comparing current and proposed APPS staffing levels, recognizing that actual staffing levels at the end of 2021 and entering 2022 are likely higher due to recent staffing increases through the police funding model. Under the current model, 3,038 officers are supplied through contract policing. This includes 1,480 through the Provincial Police Service Agreement (PPSA) and 1,312 through Municipal Police Service Agreements (MPSAs). Additionally, 190 civilian members and 743 public service employees are employed by the RCMP in the province.

The proposed model offers two different potential future states. The first (Model A) proposes the creation of two levels of officers. Level 1 officers would be trained to respond to all calls, while Level 2 officers would be trained to respond to non-violent or non-urgent calls. The second (Model B) future model proposes only using Level 1 officers.

Both Models A and B would see the total number of police employees increase from 3,971 to 4,189. Model A proposes 1,613 Level 1 officers, 1,540 Level 2 officers, and 1,036 public service employees (support members, nurses, and social workers). Model B would see the same number of total officers as Model A, with the difference being that all 3,153 officers would be Level 1. Model B proposes the same number of public service employees as Model A. No details are provided on the specific scopes of Level 1 and Level 2 officers in Model A.

RMA is concerned that the transition study makes no mention of deployment numbers based on geographic coverage. Without an increase in the number of rural officers, it is difficult to support the proposal. Additionally, RMA is concerned with the distribution of Level 1 and Level 2 officers in rural areas. As stated in the transition reports, Level 2 officers will not be trained to respond to all calls. If this model is chosen, there is significant risk that a rural detachment may be left with an emergency call requiring a Level 1 officer, but only a Level 2 officer is available to respond. As the report does not acknowledge this situation, RMA cannot support this model.

While the overall number of frontline police is a factor contributing to service level, it is impossible to evaluate the actual impacts of the proposed models without understanding how the skills and powers of level 1 and 2 officers will differ, and how each would be distributed throughout the province.

Questions and gaps

- ◆ What will be the difference in scope of work for Level 1 and Level 2 officers?
- ◆ What will be the difference in training between Level 1 and Level 2 officers?
- ◆ If Model A is chosen, how will rural detachments be staffed to ensure there are always Level 1 officers available to respond to urgent calls?
- ◆ What criteria would the Government of Alberta use to decide between Model A and Model B?

Deployment and staffing approaches

Summary

Under the current RCMP policing model, staffing requirements for detachments are determined by the RCMP's Human Resources Committee based on recommendations from the RCMP "K" Division. The model used to determine staffing is primarily based on the historical number of calls for service in each detachment.

The proposed APPS approach to deployment and staffing does not appear to propose a detailed approach or formula to determine staffing levels at each detachment. Instead, the report emphasizes the importance of diverse skills and a community policing-based approach when determining workforce requirements for various detachments. While a diverse set of skills at each detachment is important, RMA is concerned with the lack of planning to justify how rural detachments will be staffed and what metrics will be used to determine their staffing level, particularly if Model A is chosen and there are two levels of officers.

The reports recommend recruiting individuals to serve as officers in their own communities to ensure police understand local customs and issues. RMA is concerned about the goal of prioritizing hiring police locally, as there are many potential conflicts of interest in small, close-knit rural communities that may impact policing outcomes if a local resident is recruited to provide policing services.

Questions and gaps

- ◆ What criteria will be used to determine staffing levels at a detachment?
- ◆ How will the skill sets required at each detachment be determined?
- ◆ Will consideration be given to the unique nature of rural policing when determining staffing levels and service availability?

Mental Health

The proposed APPS model includes a focus on enhancing mental health and addictions support as a core aspect of police service delivery. In fact, the theme of "community policing" is present throughout the operating model, with a major aspect of that theme linked to collaboration between the APPS and various community members and stakeholders to effectively address mental health issues. This focus is reflected in an emphasis on formal and informal engagement with local organizations specializing in mental health support, as well as embedding similar supports within frontline police service delivery and making it a foundation of training for APPS officers.

Mental health specialists within the APPS

Summary

The report recommends hiring nurses, mental health professionals and social workers to work directly in the APPS, and respond to distress calls with police officers. The recommendation is justified as a means to reduce the need for police to partner with various organizations to provide such support. These resources would be deployed through the development of a tiered response model, which would ensure that mental health experts are deployed to situations that require their expertise and may be complex or time-consuming, while allowing officers to remain available for urgent criminal calls.

The report calls for the formation of 65 teams of peace officers and mental health professionals to be dispatched provincewide as part of the APPS to respond to such issues. RMA is concerned that the reports do not reference where these teams would be located geographically and there is no statement guaranteeing they will be deployed in rural areas.

Questions and gaps

- ◆ How many professionals will be on each mental health team?
- ◆ Will every team be trained and staffed in the same manner?
- ◆ How will the 65 teams be distributed across the province?

Mental health officer training

Summary

The report recommends an officer training program that combines education on core policing principles alongside Indigenous cultural awareness, customer service concepts, and people management skills. An increased focus on mental health training for officers is also recommended. Specifically, APPS officers would be trained to better understand the link between brain development and the risk for mental and physical illnesses that often drive mental health and addictions related calls for service.

RMA supports this initiative, however, it is unclear why this initiative could not be implemented for existing RCMP officers in Alberta.

Questions and gaps

- ◆ It is unclear why this initiative could not be pursued with the RCMP. It is therefore unclear why this specific initiative is touted as a goal of the proposed model.

Deployment

The proposed model would deploy APPS resources using a hub model, in which one detachment acts as a main regional hub, and other nearby detachments operate on a zoned deployment model with distinct capabilities. The overall distribution of detachments is stated to remain, at worst, equivalent with the current number of detachments in operation in the province under the RCMP model. The proposed model would also leverage current specialist units such as ALERT to work with regional hubs and local detachments to address specialized or high-risk criminal activity.

Hub model

Summary

The reports recommend establishing a hub model in which select detachments will serve as regional hubs. Those detachments will host certain specialized services available to the entire region, as well as act as “service centres” by also co-locating with other local and regional social services to support increased collaboration and allow individuals to access multiple services under one roof. Detachments not identified as hubs will provide basic police services.

RMA is concerned that the reports do not specify how many hubs will be created or the criteria for determining where hubs will be placed. The reports are silent on whether the specialized services offered at hubs will be the same across the province, or if different hubs will offer different levels of service. Additionally, RMA is unclear if municipalities with a service hub will be given greater support and input in their local policing committee. Without these details, RMA is concerned the hub model will lead to an inequitable level of service between rural and urban communities.

Questions and gaps

- ◆ How will the location of hubs be determined?
- ◆ Will each hub have the same level of service as other hubs?
- ◆ There is no commitment on the number of hubs that will be created.
- ◆ There is no guarantee that hubs will be located in a way to ensure equitable access to specialized resources in rural communities.
- ◆ Will municipalities hosting hubs be required to pay more for policing? Will municipalities far from hubs be required to pay less?

Specialized units

Summary

The report recommends that the APPS invest in enhanced and expanded specialized units, both to address major and organized crime more effectively, and to ensure local detachments can focus on community policing. The first example of this proposed shift is an increased investment in ALERT. Under the proposed model, ALERT would expand its current scope of services and take on responsibilities for human trafficking, financial crimes, and cybercrimes.

RMA recognizes the importance of specialized units to address certain types of crime. On its own, the creation of specialized units has merit. However, RMA is concerned that these units will not be available in all rural communities. As the reports make no mention of their geographic distribution, RMA cannot support the proposed model.

Questions and gaps

- ◆ It is unclear why this approach could not be pursued within the existing RCMP model.
- ◆ There is no commitment on how these specialized resources will be distributed across the province, making it impossible to determine if this approach will improve rural policing.

“Smart owner” service deployment model

Summary

In addition to changes to ALERT and the role of Sheriffs, the proposed model would rely on a “smart owner” model to collaborate with municipal police services to provide other specialized services on a regional basis. A smart owner model uses metrics such as demand for service, cost of ownership, and collaboration opportunities to determine the need for the APPS to invest resources.

According to the report, the current system duplicates specialist services across the RCMP and Edmonton and Calgary police services, resulting in unnecessary costs and over-provision of certain important but low demand services, such as tactical teams and explosive device response. Under the proposed model, the APPS would use a smart owner approach to contract with the Edmonton and Calgary police services to utilize many of their existing specialized services on a regional basis, with the Edmonton Police Service (EPS) acting as the hub for northern Alberta and the Calgary Police Service (CPS) acting as the hub for southern Alberta. According to the report, detailed analysis and negotiation on the expansion of current Edmonton/Calgary services as well as the cost borne by the APPS is still required.

The proposed model appears to rely heavily on the smart owner model. Given the report’s statements about the steps still needed to secure this approach, RMA is concerned this specific proposal has the potential for cost overruns, inefficiencies, and delays in implementation. Additionally, this approach involves using the EPS and CPS to support policing operations in all of Alberta. RMA is concerned about this proposal for three reasons:

- ◆ Much of rural Alberta is very far from these two major cities, and it is therefore not likely that resources can be shared in a timely manner.
- ◆ The EPS and CPS are experienced in urban policing, and may not have the experience required to support rural operations without significant provincial investments.
- ◆ The municipal councils of Edmonton and Calgary oversee and set budgets for the EPS and CPS respectively. If those municipalities decide to significantly shift their current approach to municipal policing in the form of significant budgetary or strategic changes, the impacts on how and to what extent the EPS and CPS could continue to participate in a smart owner model are unknown.

Questions and gaps

- ◆ Are EPS and CPS capable of handling the increased demand for their specialized services?
- ◆ How will conflicts be handled if a specialized resource is needed in multiple jurisdictions at the same time?
- ◆ Much of rural Alberta is far from Edmonton or Calgary, this will create inequitable access to service in rural and remote areas.

Integration

The final model emphasizes integrating APPS with existing provincial, non-profit, and privately-delivered services in a variety of ways. The reports focus on the integration of training, information sharing processes, forensics capacity, and dispatch among APPS and other service providers.

Training

Summary

The reports highlight the training required for police officers, including firearms training, driver training, as well as cultural sensitivity and customer service training. The current state report discusses how the RCMP takes advantage of a national network of shared resources to train officers at facilities across Canada. The final report suggests such training should be pursued by the APPS through partnerships with other policing organizations, the Canadian Armed Forces, and existing driving schools.

RMA is concerned about the use of partner organizations to provide training when no commitments from these organizations have been made. The assumption that they have the capacity and willingness to provide support without confirmation has the strong potential to lead to cost overruns and inefficiencies. Additionally, the reports do not address how these organizations would be compensated for their partnerships in training and whether existing facilities are adequate to support the level of training required of police officers.

Questions and gaps

- ◆ Do the identified partner organizations have the capacity to take on increased training demands?
- ◆ The assumption that the partnerships can be achieved without details on how they will be compensated creates significant room for unaccounted for costs.

Information sharing

Summary

Police services handle a large volume of information and data, some of which needs to be shared with other organizations. The current RCMP model is not integrated with the records systems used by the Edmonton (EPS) and Calgary (CPS) police services. Under the proposed model, the APPS would create a new records management system to handle their data needs. Additionally, the *Police Act* would be modified to require all municipal police forces to work with the APPS to integrate their systems.

RMA is concerned that the proposed model does not address how community peace officers would be incorporated into the new information sharing model, and how municipalities would be supported with this transition. Community peace officers would benefit greatly from access to information available to police for safety reasons.

Questions and gaps

- ◆ The lack of clarity regarding how community peace officers may access this new information sharing system demonstrates an incomplete analysis of this initiative.

Dispatch

Summary

The discussion regarding dispatch integration appears to focus on the integration of Real Time Operations Centres (RTOCs). Both the EPS and CPS have RTOCs, which are used to coordinate police response. As RTOCs are more applicable in urban settings, the model would rely on the APPS working with EPS and CPS to integrate into the existing RTOCs to coordinate dispatch.

As discussed above, RMA is concerned that the reliance on EPS and CPS for RTOCs would lead to an inequitable level of service, where rural areas farther from these urban centres would see a lower level of service.

Additionally, the model does not explore how conflicts would be handled if an RTOC is needed in multiple locations at once. Without these details, RMA cannot support the proposed model.

Questions and gaps

- ◆ How will RTOCs be shared with remote communities in a timely manner?
- ◆ If an RTOC is needed in multiple jurisdictions simultaneously, how and who will determine which jurisdiction takes priority?

Costs

The final report includes two costing models based on operating models A and B, summarized in the “staffing and human resources” section above. The total cost for model A (which includes two levels of officers) in year one of an APPS is roughly \$734.5 million, and option B (one tier of officer) is \$758.9 million. This is in comparison to a total cost of \$783 million under the current RCMP model (including Sheriffs).

Human resourcing costs

Summary

In both the current model and proposed models A and B, salaries and benefits are by far the largest cost category, comprising roughly 70% of total costs. The individual salary estimates for Level 1 officers are based on a combination of estimates related to current RCMP salary increase as a result of unionization, as well as benchmarks for comparable positions in Edmonton and Calgary. The report does not provide details as to the basis for the salary estimates for Level 2 officers. RMA requests clarification on how Level 2 officer salaries were established.

Questions and gaps

- ◆ How was the salary for Level 2 officers determined?
- ◆ Will municipal costs be linked to the number of Level 1 and Level 2 officers within their regions?

Administration costs

Summary

Administration costs account for about 10% of the total costs in the APPS model. These include administration, professional services, travel, governance, media, etc. The cost model assumes that many of these models can be incorporated into existing Government of Alberta (GOA) shared services teams. The report also notes that the projection of shared service and administrative efficiency opportunities is limited, as the areas of the GOA responsible for shared services have not been engaged on detailed shared services requirements at this point.

Seeking efficiencies is a prudent exercise. However, RMA is concerned by the report’s suggestion that administrative services can be absorbed by the public sector with no additional costs. This implies a high level of underutilization in the public sector that is not likely reality. RMA has serious concerns that this proposal will lead to cost increases for the public sector, and therefore all Albertans.

Questions and gaps

- ◆ Is there an abundance of unused capacity within the public service to handle the increased administrative workload to support the APPS without creating any additional positions? How will this impact the performance of other Government of Alberta functions?
- ◆ There is no commitment that the additional roles to be filled by the public sector will not lead to increased costs to all Albertans to pay for additional positions.

Municipal cost allocation

Summary

As municipalities are major stakeholders on this issue and directly impacted by the proposed change in terms of both service delivery and financially, RMA is concerned the municipal cost allocation for the APPS model was deemed out of scope for the PwC report. The Government of Alberta must consult with municipalities on this aspect of the APPS model prior to making any final decisions on a transition. While the Minister of Justice and Solicitor General has stated that as whole, municipalities will not face increased costs under the model, information has not been provided on whether the methodology to determine the share of costs incurred by individual municipalities will change. It is certainly possible that while the overall municipal contribution is unchanged, the contributions of individual municipalities could increase or decrease under the model.

Questions and gaps

- ◆ There are serious gaps in demonstrating that an APPS can be created without increased costs for municipalities.
- ◆ The statement that municipal costs will not increase as a result of the creation of an APPS is not sufficient. A financial plan must be provided to determine the validity of this claim.
- ◆ How will the costs incurred by individual municipalities be determined? Will municipal costs be linked to service levels, number of officers, location of hubs, or the current Police Funding Model formula?

Transition costs

Summary

The final report includes a transition cost model intended to capture all costs associated with shifting from the current RCMP service delivery model to the APPS. The report estimates the total transition costs at \$366 million over a six-year period, with \$241 million in operating and \$125 million in capital expenditures. The largest single transition cost category relates to RCMP transition, which basically equates to the point in time when both the RCMP and APPS will be actively providing services in the province as service is gradually transitioned from one provider to the other. The second largest is real estate, although the report lacks detail on what drives real estate costs, this is presumably linked to the transition of responsibility for physical detachments and other spaces from the RCMP to APPS.

Given the experience in Surrey transitioning away from the RCMP, RMA expected the model to include a transition cost range, as well as a list of potential variables or risk factors that could lead to changes to the original cost projection. Considering the large number of assumptions within the proposed model, it is unrealistic to provide a single value to cover transition costs. Additionally, these transition costs are based on a point in time when the report was drafted. If the decision to transition to an APPS is made in the future, this cost will no longer be valid.

Questions and gaps

- ◆ The transition costs should include a range of values to capture the uncertain nature of costs.
- ◆ The transition costs are current as of the date of the report, and if a transition is undertaken at any point after that, the costs will likely not be the same due to inflation, changes in real estate or input costs, and other changes that occur over time. This is not reflected in the report.

Other Issues

This section includes issues RMA identified in the proposed model that require further information.

Community safety strategies

The report recommends working with municipalities to develop community safety strategies, referencing the Ontario model where municipalities are mandated to complete the strategies. The strategies are a way in which detachments and communities collaborate to develop actions related to social development, prevention, risk intervention and incident response.

RMA is seeking clarification on:

- ◆ Would community safety strategies be mandatory?
- ◆ Who would be responsible for the costs of developing and updating the strategies?
- ◆ What accountability mechanisms would be built into the strategies?
- ◆ How is “community” defined for the purposes of the strategies? Does this include only the municipality or other stakeholders?
- ◆ How do the strategies align with local policing committees?

Co-location of services

The report recommends co-locating policing services with other provincial and community services by basing the services in the same building and a shared work environment. This will allow the partner organizations to work more closely to support early intervention and direct an individual to the services needed to support a positive outcome.

RMA is seeking clarification on:

- ◆ Are there risks in closely linking social services with police that may result in vulnerable individuals being less likely to access social service agencies?
- ◆ How would this approach be implemented when the current location of police service and other provincial and community services vary greatly across the province? Is the cost of physically re-locating services (presumably into detachments) included in the transition cost estimates? If so, how accurate is the cost projection?
- ◆ Will municipalities and service providers have an option as to whether they want to co-locate services?
- ◆ How would this approach impact existing municipal and non-profit property-related costs such as leases, building maintenance, etc.?

Rural service levels

The future state report repeatedly references the need to improve and standardize rural service levels. While this is an important recognition, the reports include minimal detail as to how the APPS would define, measure and improve service levels. The report does link initiatives such as increasing the capacity of ALERT, shifting to a hub-based detachment model, and coordinating more closely with community service agencies as approaches to improve service levels.

If properly implemented, these all are likely to improve overall service levels. However, the report includes no information on how success in this area would be measured, benchmarks to define “good” and “bad” service levels, or, perhaps most importantly, specific information on the number of actual frontline police officers that would be available in rural areas under the APPS model. The reports also provide no information on core service level areas such as response times.

RMA is seeking clarification on:

- ◆ What factors will be used to define service levels under the APPS?
- ◆ How will the changes and recommendations proposed in the APPS report specifically enhance services in rural areas?
- ◆ How would the APPS define a “rural” and “urban” area for the purposes of service level tracking?
- ◆ What metrics or analysis were used to verify that the changes outlined in the report will actually improve service levels in rural areas?

Community policing

The proposed model places heavy emphasis on the idea of community policing. However, the proposal does not define community policing, how it would be implemented, how this would differ from the current policing model, or what the specific benefits would be. RMA is of the understanding that community policing tends to be collaborative in nature, such that it relies on community partnerships and community-based crime prevention techniques. For example, it involves police working alongside community groups such as local businesses, faith-based organizations, social service providers, etc., to develop strategies and solutions to local issues. However, the proposed model does not clarify if this is their definition of community policing.

RMA is seeking clarification on:

- ◆ How does JSG define community policing?
- ◆ How will community policing be implemented?
- ◆ Why can't community policing be utilized within the RCMP model?
- ◆ Has JSG researched Canadian examples of community policing such as the Ontario Mobilization and Engagement model for Community Policing or the Community Mobilization Prince Albert group organize by the Prince Albert Police Service in Saskatchewan?

Engagement strategy

JSG has been engaging with municipalities, Indigenous groups, and other stakeholders to solicit feedback on the proposed APPS model. While this has provided for many opportunities for municipalities to provide input, these engagement sessions have been a challenge. Frequently when municipal elected officials challenged an idea presented by JSG they were told that their challenge was political in nature and would not be considered. Additionally, when elected officials asked questions, they frequently did not receive a response but rather were asked what their recommendation would be to address their question. This style of engagement was frustrating for elected officials and left them without the ability to meaningfully participate.

A second item of concern from these engagement sessions is that they rely on municipalities to provide input without a parallel process for the general public. RMA is pleased to see that municipalities were selected to provide input, however, a similar process was needed to solicit input from the public to understand their perspectives. It is unreasonable to expect municipal elected officials to provide input on behalf of all their residents, who no doubt hold a variety of opinions on the topic.