

Report of

**The 2015 Newfoundland and Labrador
Electoral Districts Boundaries Commission**



2015 *Newfoundland and Labrador
Electoral Districts Boundaries Commission*

Hon. Robert P. Stack, Chairperson | Shawn Skinner, Deputy Chairperson

Bernard Coffey, QC | Allan Goulding | Bill Matthews

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Commission Members

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Shawn Skinner, Deputy Chairperson
Bernard Coffey, QC
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Submitted to:

The Honourable Darin King
Minister of Justice and Public Safety
for the Province of Newfoundland and Labrador

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1.0 REPORT

This is the report of the 2015 Newfoundland and Labrador Electoral Districts Boundaries Commission. Attached as **Appendix 1** is a summary of the Commission’s final proposal, including district names, populations and deviations from the quotient where applicable. Attached as **Appendix 2** is the Commission’s complete final proposal for the division of the Province into 40 one-member electoral districts, including district names, boundary descriptions, district populations, district areas, deviations from the quotient where applicable, and maps.

2.0 DEFINITIONS AND ABBREVIATIONS

In this report the following terms are defined as follows:

Act	the <i>Electoral Boundaries Act</i> , RSNL1990, Chapter E-4, as amended (Appendix 3)
Commission	the Newfoundland and Labrador Electoral Districts Boundaries Commission as continued pursuant to the Act and as appointed in 2015
CSD	Census Subdivision
Labrador	the mainland portion of the Province
MHA	Member of the House of Assembly
Newfoundland	the island portion of the Province
Province	the province of Newfoundland and Labrador

3.0 THE COMMISSION

The Commission comprises the Honourable Robert P. Stack, Chairperson; Shawn Skinner, Deputy Chairperson; and Commissioners Bernard Coffey, QC, Allan Goulding and Bill Matthews.

Kate O’Brien is Legal Counsel to the Commission, Diane Blackmore is the Chief Administrative Officer, and Jeanette Fleming is the Administrative Assistant.

Brett Forsey, MSc, of the Newfoundland and Labrador Statistics Agency, provided statistical, mapping and logistical support.

Jeff Wood, BSc (Eng.), of the Department of Municipal and Intergovernmental Affairs, Surveys and Mapping Division, provided cartographic and map-making services.

Alfred Power, MA, of the Newfoundland and Labrador Statistics Agency, provided statistical information.

Conrad Power, PhD, of the Newfoundland and Labrador Statistics Agency, provided statistical modelling and spatial mobility analysis.

Section 17 of the Act requires all departments of the government of the Province to make available their services and facilities to the Commission for the purpose of enabling it to discharge its duties. In addition to the above, the Commission was also ably assisted by members of the public service in the Department of Justice and Public Safety, the Crown Lands Administration Division of the Department of Municipal and Intergovernmental Affairs, the Office of the Chief Information Officer, the Office of Public Engagement, the Office of the Queen's Printer, and others.

4.0 APPLICATION OF THE ACT

The Commission's work is mandated by the Act. All references below are to the Act's requirements for 2015 unless otherwise stated.

Section 13(1) directs the Commission to divide the Province into 40 proposed one-member districts.

Section 15(1) directs the Commission to ensure that the division of the Province into districts gives primacy to the principle that the vote of every elector in the Province has a weight equal to that of every other elector. This principle is also sometimes referred to as the "one person – one vote" rule, or by the terms "parity" or "equality" of voting power.

Under section 15(6), the Commission is to divide Labrador into four proposed districts, taking into consideration their historical boundaries. Section 15(4) requires that one of the four districts in Labrador be the portion of Labrador that lies generally north of Lake Melville.

To propose the 36 districts for Newfoundland, section 13(4) requires the Commission to determine a quotient for each proposed district by dividing the total population of the Province by 36. Pursuant to section 13(7), the total population of the Province does not include that portion of the population living within Labrador.

For the purpose of establishing the quotient, section 13(6) directs that the population of the Province be taken from the latest census figures available under the *Statistics Act* (Canada), irrespective of when those census figures were actually taken. The latest census figures available at the time of the Commission's work were the 2011 Statistics Canada census data (**Appendix 4**). Pursuant to section 15(5), in calculating the quotient, the Commission assumes that the proportion of electors to the general population is constant throughout the Province.

The 2011 census established the population of the Province as 514,536. The population of Labrador is 26,728 and the population of Newfoundland is 487,808. Dividing the latter figure by 36 establishes the quotient at 13,550.

Section 15(2) permits the Commission, where necessary, to depart from the quotient but not to a greater extent than 10% more or 10% less of the quotient. The permitted 10% range is from 12,195 to 14,905.

By sections 15(3) and 15(3.1), the Commission may depart from the 10% deviation where it concludes that the departure is warranted by special geographical considerations, including the community of interests of the residents of those communities not connected by road, or by the accessibility, size or shape of a region. Section 15(3) permits the Commission to recommend the creation of districts with populations that depart from the quotient by 25% more or 25% less. The range permitted by section 15(3) is 10,163 to 16,938. Additionally, section 15(3.1) permits the Commission to recommend the creation of not more than two districts in Newfoundland with a population that departs from the quotient by greater than 25% more or less.

In proposing names for the districts, section 14(1)(c) requires the Commission to incorporate the historical and geographical factors that it considers appropriate.

5.0 METHODOLOGY

5.1 APPROACH ADOPTED BY THE COMMISSION

From the outset of the Commission's mandate, the Commission resolved that its work would be politically neutral. All Commissioners were committed to the principle that effective and fair representation for the people of Newfoundland and Labrador demands that boundaries not be proposed to favour one political interest over another.

The Commission also resolved to keep its internal deliberations confidential. It was important that each of the five Commissioners be free to speak openly and candidly with each other.

The Chairperson was designated by the Commission to be its spokesperson unless, at his discretion, he designated the Deputy Chairperson to comment.

The Commission was mandated to propose 40 districts for a province that currently has 48 districts. In approaching this task, the Commission did not take the view that it was “removing” eight districts or “adjusting the boundaries” of 40 of the current districts. Rather, the Commission approached its task with the goal of effective representation for all voters in the Province based upon the strictures of the Act and the guidance of the principles discussed below.

Although section 4(2) of the Act provides that a quorum for meetings of the Commission is two, the Commission decided that, in so far as it was practicable, all Commissioners would attend public sittings. Although splitting the Commission for the purpose of public sittings may have allowed more sittings within the relatively short available time, the Commission felt that there was greater benefit in all Commissioners hearing all public submissions first-hand.

In undertaking such an important task for the people of Newfoundland and Labrador, the Commission committed to transparency and accountability. The Commission resolved to conduct its business in accordance with the *Access to Information and Protection of Privacy Act*, SNL 2002, c. A-1.1. The Commission also decided not to permit private representations. All submissions would be shared with all Commissioners and made available to the public. Personal information of submitters would not be disclosed without consent.

The Commission was greatly aided by technology. The use of technology for public engagement is specifically discussed in Section 6.0 below. The Commission also had the benefit of advanced mapping technology and statistical modelling tools. Without these tools, the Commission’s challenge of completing its task within 120 days might have been insurmountable. With the software and computer systems currently available and the assistance of dedicated and skilled users, the 2015 Commission could view and adjust electoral boundary options relatively quickly. This proved invaluable to keeping the Commission’s work on schedule and maximized the time available for public consultation.

5.2 GUIDING PRINCIPLES

5.2.1 FOR PROPOSED DISTRICT BOUNDARIES

First and foremost, the Commission was guided by the requirements of the Act. Paramount among these is the principle of equality of voting power found in section 15(1). For Newfoundland, the Commission’s primary objective was to have district populations as close as practicable to 13,550.

The achievement of absolute voter parity – all districts with populations of exactly 13,550 – is practically impossible. In any event, absolute parity would not necessarily be desirable because

it can undermine the ultimate goal of effective representation. Factors such as geography, community history and community interests may need to be taken into account to ensure that people are effectively represented in the House of Assembly. Therefore, as shown in the next section of this report, the Commission found it necessary that every district in Newfoundland depart from the quotient, although all but two were within the 10% deviation permitted by section 15(2) of the Act. (When this report refers to populations of proposed districts “adhering to the quotient” or similar language, it means being within a 10% deviation from the quotient.)

Although the Commission could exceed the 10% deviation where the departure was warranted by special geographical considerations, it concluded that such circumstances were necessarily limited. Many areas of Newfoundland present challenges for governance caused by their accessibility, size or shape. The courts have held that significant negative deviations from the quotient can be justified for large and remote districts; it is more difficult, however, to justify significant positive deviations, even for urban districts. Consequently, the Commission was aware that proposing many districts with deviations beyond 10% for rural areas could result in unacceptably large positive deviations in more urban districts, especially on the Avalon Peninsula.

For the two Newfoundland districts where the Commission proposes a departure from the quotient by more than 10%, the Commission concluded that the departure was warranted by special geographical considerations distinguishing those districts from the rest of Newfoundland. Although the Act does not provide a closed list of special geographical considerations, it does list two examples: (1) the community of interests of residents of communities not connected by road; and (2) the accessibility, size or shape of a region. The Commission considered these factors and determined that they were abundantly present in the two Newfoundland districts that it recommends should have populations more than 10% below the quotient.

The 36 districts in Newfoundland are all interconnected. The Commission’s decisions about one proposed district almost always had a “domino effect” on adjacent and even non-adjacent districts. As a result, no change or alternative for a proposed district could be considered in isolation. The domino effect was more significant in areas of high population, particularly on the Avalon Peninsula, where a change of proposed boundary usually affected all proposed districts in the region.

The Commission also considered factors and was guided by principles that are not specifically mandated by the Act but that nevertheless underlie effective representation. These factors and guidelines are discussed below. The Commission did not assign any particular order or priority to these considerations; rather, the Commission applied and was guided by them where they seemed appropriate.

Two principles applied to urban areas. First, in cases where the population of an urban or other major centre did not exceed the 10% quotient range, the Commission endeavoured not to divide the centre between districts. Urban voters and rural voters have different community interests

because of the relative differences in size and population density of their communities. The Commission preferred to keep these distinct communities intact within districts when possible. This principle could not be applied in urban centres where the population was in excess of the 10% quotient range, and so those areas had to be divided.

Second, with respect to deviations from the quotient, in urban and more densely populated areas the Commission considered it more acceptable to have positive deviations from the quotient rather than negative ones. In rural districts, particularly more remote ones, the Commission considered it more acceptable to have negative deviations. A positive deviation from the quotient in a district means that the district is more densely populated than average, or, in other words, it has more residents than the average district. A negative deviation means that a district has fewer residents than the average district. Canadian courts have recognized that rural ridings are more challenging to serve because of difficulties in transportation and communications. The courts have also recognized that rural voters make greater demands on their elected representatives, possibly because of the absence of alternative resources available in urban centres. The Commissioners generally shared this view, recognizing that although advances in communication technology and improved road networks have significantly facilitated the servicing of rural districts, the challenges have not been eliminated. It made sense to the Commission, where practicable, to accept higher densities in urban or more accessible districts and lower densities in rural and more remote ones. This was not, however, universally achieved.

Because the Commission was satisfied to have more densely populated districts in urban areas, it was able to enhance effective representation by situating a disproportionate number of seats off the Avalon Peninsula. If the quotient alone were considered, there would be 19 districts on the Avalon and 17 districts in the rest of Newfoundland. The Commission determined that effective representation required it to divide Newfoundland into 18 proposed districts both on and off the Avalon, and all but two of the proposed Avalon districts have a population in excess of 14,000.

The Province has a number of peninsulas and prominent headlands. For many of these the Commission had a choice of either starting at the tip and moving along the peninsula or headland until an appropriate population was captured that fell within the 10% quotient range, or splitting the peninsula or headland along its major axis. The Commission felt that the community of interests among people living on the outer reaches of a peninsula or headland was strong, and it chose the former approach so that populations in such distinct geographical regions were maintained within a single electoral district.

The Commission endeavoured to use major thoroughfares or roads as district boundaries where possible, especially in urban areas. This approach has several advantages. First, major roads generally follow straighter lines over longer distances than do secondary roads; following them reduces zigzags in proposed boundary lines. Second, major roads are widely known and easily recognized by the public. Finally, major roads often create dividing lines between residential populations, since many of them feature commercial or institutional uses or are unpopulated.

The Commission wished to avoid “split” districts, in which, to travel across the full district, it would be necessary to cross through another district. However, because the Commission did not want to divide urban areas, in its initial proposal the proposed district of Exploits was split to create the proposed district of Grand Falls-Windsor. In addition, because the population of Burgeo – La Poile resides along the southwest coast of the Province, but the road to Burgeo runs south from the Trans-Canada Highway outside of the district, it is also split in this sense.

The Commission was also guided by the way people move through the regions in which they live. Although historically much movement between communities in Newfoundland was by boat, today it is primarily by car and truck. Newfoundland and Labrador is now principally a province where the roads, rather than the bays and straits, dictate travel patterns. The Commission therefore continued to design electoral districts based largely on the road networks through regions and on the most frequently used routes of travel, recognizing hubs to which populations naturally migrate.

To keep areas of high interconnectivity intact within districts, the Commission was influenced by the theory of spatial mobility modelling. The Commission was much aided in this regard by statistical modelling and spatial analysis done by the Newfoundland and Labrador Statistics Agency. Dr. Conrad Power of that organization provided valuable information on daytime intercommunity travel for work, health care and education. The Commission also consulted the *Community to Community Distance Finder* tool made available by the Newfoundland and Labrador Statistics Agency to determine driving times within proposed districts.

Although all electors in Newfoundland and Labrador share a community of interests at the provincial level, there are many smaller communities of interest within the Province. These include regions that geographers refer to as “socio-geographic interaction zones” – areas including individuals with common economic, labour market, social or cultural characteristics. These communal interests are often strongly correlated to people’s movement within a geographical area to access essential public and community services, particularly health care and education. The Commission endeavoured to keep such zones intact within districts. However, the populations of almost all recognized socio-geographic interaction zones in the Province are considerably less than the quotient. As a result, there were a number of instances where zones were joined with others to create a district. Also, although the Commission preferred to keep such zones fully intact within individual districts, population distributions sometimes dictated that zones had to be dispersed among two or more districts.

Statistics Canada reports its census population in geographical units. The primary unit Statistics Canada uses for reporting is a Census Subdivision or CSD, which is typically a municipality or a geographical area deemed equivalent to a municipality for statistical purposes. In most cases, the Commission enclosed full CSDs within proposed district boundaries so that the population could be readily established. However, in many cases it was necessary to divide CSDs into smaller geographical units called “dissemination blocks.” This occurred primarily in urban districts. A dissemination block is the smallest geographical area for which Statistics Canada

reports population and dwelling counts. Dissemination blocks were used to determine accurately the population within a divided CSD where it is intersected by a proposed district boundary. In two cases, however, to determine the proposed district populations it was necessary to split dissemination blocks in order to estimate the number of people living on each side of a proposed boundary for the initial proposal. These estimates were provided by the statistical analysts who worked with the Commission.

There are many islands around the Province's coast. All of the islands have not been named in the boundary descriptions, but they are included in the proposed districts to which they are adjacent. In describing the proposed districts, the Commission used the language "together with all islands adjacent thereto" to indicate this. For greater clarity, however, the Commission specifically named islands that are either populated or are very close to boundaries that split a bay or other body of water.

In some cases the proposed districts have boundaries in common with the current electoral districts. Primarily this occurred because the boundary currently exists along a well-known geographical feature, major thoroughfare or municipal boundary, and where possible the Commission preferred to set district boundaries along such features.

5.2.2 FOR PROPOSED DISTRICT NAMES

As mandated by the Act, the Commission used both historical and geographical considerations in choosing names for its proposed 40 electoral districts.

Because the democratic institutions of the Province have such long associations in our political consciousness, historical district names and elements of historical district names were used where the Commission deemed it appropriate. For reference, the Commission had a list compiled of district names used in the Province since 1832 (**Appendix 5**).

The Commission also frequently used geographical features in names, whether associated with historical districts or otherwise. In particular, the names of major parks and water bodies in the Province were featured in several proposed district names.

The Commission avoided names with more than two elements because longer names can be cumbersome and impractical.

6.0 PUBLIC ENGAGEMENT

From the beginning, the Commission was aware that completing its task in 120 days would be challenging. A reduction in the number of seats from 48 to 40 would mean that almost every voter in the Province could have his or her electoral district changed significantly. While the Commission would have preferred to visit all or most of the 40 proposed districts in person for public sittings, time simply did not permit it. To overcome this impediment, the Commission resolved to use modern technology to expand its public consultations beyond the more traditional in-person public sittings. The Commission wanted to give every Newfoundlander and Labradorian the opportunity to be informed about the proposal and to provide feedback.

In order to engage with voters in as many affected areas as possible within the time available, the Commission divided its public sittings into two types. The first type – held in Clarenville, Conception Bay South, Corner Brook, Grand Falls-Windsor, Happy Valley-Goose Bay, St. John's and Whitbourne – were conducted at venues where the Commissioners were present in the same meeting space as the public. The second type were “virtual sittings” held in Carbonear, Lewisporte, Marystown, St. Anthony and Stephenville. For these, a public meeting space was provided in the community. The Commission then conducted the sitting via video link from a public meeting space in St. John's.

The sittings were promoted on the Commission's website and on Twitter. Press releases were issued for every public sitting. The Commission also purchased advertising space on radio stations and on TC Transcontinental Media newspaper websites.

In order to further maximize opportunities for public engagement, the Commission used the following:

1. **Website:** The Commission maintained a website at www.nledbc.ca that was kept updated with information about the Commission and its work. The Commission was able to post additional information, including individual maps showing proposed districts with an overlay of the current districts, as its work progressed. The public could also provide feedback through the website. More than 13,000 users visited the website.
2. **Email:** The Commission maintained an email account at info@nledbc.ca so that members of the public could email comments and submissions to the Commission.
3. **Comment Form:** A feedback form could be completed by users and submitted to the Commission from the website.
4. **Toll-free phone line:** Recognizing that not all Newfoundlanders and Labradorians have access to or use the Internet, the Commission set up a toll-free recorded submission line. Calls to this phone line were transcribed for review by the Commissioners.

5. **Fax line:** The Commission had a facsimile line on which it could receive submissions.
6. **Regular mail:** The Commission's mailing address was published so that people could send submissions by post.
7. **Physical office:** The Commission maintained an office in St. John's at Suite C, 83 Thorburn Road, which was open from 8:30 am to 4:30 pm each weekday so that members of the public could drop by to obtain information or leave information for the Commissioners.
8. **Twitter:** The Commission had a Twitter account, @NLEDBC_2015, so that it could tweet updates about its activities to the public. The account had 190 followers.
9. **Newspapers:** The Commission posted public notices prior to the public sittings, including its full proposal, in newspapers around the Province.
10. **Webinar:** On April 16, 2015, the Commission broadcast a webinar over the Internet. The webinar was advertised in advance on the website, on Twitter and with a press release. Over 250 unique viewers watched live over the Internet as the Commission outlined its proposal and then took questions from the media present in the room. The webinar was archived on the Commission's website so that anyone who could not view it live could watch it afterward at any time. Almost 800 unique viewers accessed the archived webinar.
11. **Skype:** On May 2, 2015, the Commission held a Skype session. Members of the public registered in advance to make submissions to the Commission using a Skype video call.

7.0 INITIAL PROPOSAL - PRIOR TO THE PUBLIC SITTINGS

As mandated by section 19 of the Act, prior to conducting its public sittings the Commission advertised its proposed division of the Province into 40 districts, including the proposed district names, boundaries and maps. This section gives an overview of the proposal as advertised (see **Appendix 6**) and the Commission's rationale.

7.1 TORNGAT MOUNTAINS

The proposed district of Torngat Mountains has the same boundaries and the same name as the current district. It has a population of 3,548. Minor changes were made to the boundary description to clarify the delineation of its northern tip.

This district is generally mandated by section 15(4) of the Act, which requires that one of the four districts in Labrador comprise that portion of Labrador that lies generally north of Lake Melville. In describing the boundaries of the Labrador districts, section 15(6) of the Act required the Commission to consider their historical boundaries. In the case of Torngat Mountains, the Commission felt that the current boundaries appropriately recognize both the remote and unique geography of the district and the community of interests of the residents of the area.

The name “Torngat Mountains” recognizes the most distinct geographical feature of the area, which is reflected in the name of the national park. It is a name derived from Inuktitut and so recognizes the aboriginal heritage of the majority of the proposed district’s inhabitants.

7.2 LAKE MELVILLE

The proposed district of Lake Melville has the same boundaries and the same name as the current district. It has a population of 10,097.

The Commission considered the current boundary appropriate and did not make any change. One small change, however, was made to the description of the boundary that it shares with Labrador West, to add precision.

The name “Lake Melville” recognizes the major body of water in the area, a saltwater tidal extension of Hamilton Inlet, which drains the Churchill River and Naskaupi River watersheds.

7.3 LABRADOR WEST

The proposed district of Labrador West has the same boundaries and the same name as the current district. It has a population of 9,238.

The Commission considered the current boundary appropriate and did not make any change. As mentioned above, one small change was made to the boundary description to add precision.

The name “Labrador West”, or its shortened version, “Lab West,” is commonly used by residents of the Province to describe this area.

7.4 CARTWRIGHT - L'ANSE AU CLAIR

The proposed district of Cartwright – L’Anse au Clair has the same name and boundaries as the current district. It has a population of 3,845.

The Commission considered the current boundary appropriate and did not make any change.

The proposed name recognizes two communities that bookend the district, one to the north and one to the south.

7.5 ST. BARBE – WHITE BAY

The proposed district of St. Barbe – White Bay¹ has a population of 12,241, which deviates from the quotient by -9.7%.

This is a rural and fairly remote district, and so in setting the boundaries the Commission considered a lower district population appropriate. The southern boundary was placed south of the community of River of Ponds so that it crossed the Great Northern Peninsula in an area of no population and gave the proposed district the minimum population in the 10% range.

The proposed name has two elements: St. Barbe, a prominent community on the west coast of the district, and White Bay, a prominent bay on the eastern side of the peninsula. Both elements have historically been used in electoral district names. “St. Barbe” was first used in 1885. “White Bay” was first used in 1882. Most recently, “St. Barbe” has been the name of a district comprising principally the western portion of the peninsula, and “White Bay” has formed part of the name for a district encompassing the northeastern portion.

7.6 GROS MORNE

The proposed district of Gros Morne has a population of 12,509, which deviates from the quotient by -7.7%.

The proposed district’s northern boundary is shared with St. Barbe – White Bay. The eastern boundary was drawn to include the western half of White Bay, including the communities of Hampden and Beaches. The road network from these communities connects with that of the western side of the Northern Peninsula and on to Deer Lake, Corner Brook and other western centres. Spatial mobility analysis confirmed that people from these communities tend to travel west to those larger centres more than to the east. The Commission therefore decided to include these communities within the proposed district of Gros Morne. The southern boundary was determined primarily with reference to the quotient. Since this is a rural district, in setting the boundaries the Commission considered a lower district population appropriate.

1 This district was renamed St. Barbe – L’Anse aux Meadows for the final proposal.

The proposed name “Gros Morne” recognizes the national park and UNESCO World Heritage Site that is located in the district. This would be the first use of “Gros Morne” as an electoral district name.

7.7 HUMBER NORTH

The proposed district of Humber North² has a population of 12,269, which deviates from the quotient by -9.5%.

The proposed district’s northern boundary borders the proposed district of Gros Morne. Its other boundaries are primarily the water boundaries of Humber Arm, Corner Brook and Grand Lake. The district includes the communities along the Humber River and the southern part of Deer Lake. The eastern part of the city of Corner Brook is also included because Corner Brook’s population is too large to be contained within a single district. This is primarily a rural district and so in setting the boundaries the Commission considered a lower district population appropriate.

“Humber” was first used as an electoral district name in 1928. “Humber North” recognizes that this proposed district encompasses the area generally north of Humber Arm and the Humber River.

7.8 CORNER BROOK

The proposed district of Corner Brook³ has a population of 13,046, which deviates from the quotient by -3.7%.

The proposed urban district comprises the majority of the city of Corner Brook. The entire municipality of Corner Brook has a population in excess of the upper 10% range of the quotient; thus, division was necessary. The Commission chose major thoroughfares and recognizable features to delineate the central portion of the city. This was one of the two areas for the initial proposal where statisticians working with the Commission had to divide Census Canada population blocks and estimate the number of people living in this proposed district.

The proposed district is named for the city that comprises it.

2 This district was revised for the final proposal. See Section 10.3.

3 This district was revised for the final proposal. See Section 10.3.

7.9 HUMBER SOUTH – ST. GEORGE’S

The proposed district of Humber South – St. George’s⁴ has a population of 12,974, which deviates from the quotient by -4.3%.

The proposed district’s northern boundary is shared with the proposed districts of Humber North and Corner Brook. It includes the area generally south of Humber Arm and the Humber River, except for the area proposed for the district of Stephenville – Port au Port. The proposed district of Humber South – St. George’s includes the communities of Stephenville Crossing and St. George’s. Although the people living in and near these communities frequently travel to Stephenville, adhering to the quotient required a division. The Commission did not want to divide the community of Stephenville Crossing. Spatial mobility analysis revealed that the people of Stephenville Crossing, St. George’s and environs also frequently travel north to Corner Brook, the western portion of which is in this proposed district. The southern boundary of the proposed district was dictated primarily by the quotient.

As noted above, “Humber” was first used as an electoral district name in 1928. “Humber South” recognizes that this proposed district encompasses the area generally south of Humber Arm and the Humber River. “St. George’s,” which recognizes both the community and the bay that lie to the west of the district, was first used as an electoral district name in 1882.

7.10 STEPHENVILLE – PORT AU PORT

The proposed district of Stephenville – Port au Port has a population of 13,781, which deviates from the quotient by +1.7%.

This proposed district includes the Port au Port Peninsula and the town of Stephenville. Port au Port is a culturally distinct region and includes people with mixed French and aboriginal heritage. The population of the peninsula, however, is insufficient to form an individual district within the 10% quotient range. As a result, the Commission chose to include Stephenville within the district, rather than dividing it between districts. Stephenville is the regional centre that services the Port au Port region. Approximately 16% of the Province’s francophones live in the Stephenville – Port au Port area.

The proposed name recognizes the two major areas of the district. “Port au Port” was first used as an electoral district name in 1928 and “Stephenville” was first used as an electoral district name in 1975.

4 This district was revised for the final proposal. See Section 10.3.

7.11 BURGEO – LA POILE

The proposed district of Burgeo – La Poile⁵ has a population of 10,715, which deviates from the quotient by -20.9%.

The Commission decided that departure from the quotient in excess of 10% but less than 25%, as permitted by section 15(3) of the Act, was warranted in this proposed district because of special geographical considerations. This proposed district covers a geographical area of 10,240 km² and includes communities not connected by road and that rely on ferry service. The proposed district is large, sparsely populated, remote and difficult to access.

The eastern boundary of the proposed district is the same as the current boundary. Historically, the community of Grey River has been in the same electoral district as Burgeo. Similarly, the community of Francois, east of that boundary, has historically been linked to Harbour Breton. The other boundaries of the proposed district have largely been dictated by quotient considerations for the proposed districts to the north. For example, the Codroy Valley was included in the proposed district of Burgeo – La Poile. Had this region been included in the district of Humber South – St. George’s, an already geographically large district, it would have been in excess of the quotient.

The proposed name is the same as that of the current district, which covers most of the same area. The community names of “Burgeo” and “La Poile” were first joined to designate an electoral district in 1855.

7.12 FORTUNE BAY – CAPE LA HUNE

The proposed district of Fortune Bay – Cape La Hune has a population of 7,401, which deviates from the quotient by -45.4% (final proposal: 7,373, -45.6%).

The Commission decided that departure from the quotient in excess of 25%, as permitted by section 15(3.1) of the Act, was warranted in this proposed district because of special geographical considerations. This proposed district covers a geographical area of 15,055 km²; it includes communities that are not connected by road and that rely on ferry service. This proposed district is also large, sparsely populated, remote and difficult to access.

All proposed boundaries for this district are the same as the boundaries of the current district of the same name.

5 This district was revised for the final proposal. See Section 10.3.

The proposed name “Fortune Bay – Cape La Hune” recognizes the bay on the eastern side of the district and the cape on the western side. “Fortune Bay” was one of the original nine districts created in 1832. The district has been known as “Fortune Bay – Cape La Hune” since 1996.

7.13 BURIN – GRAND BANK

The proposed district of Burin – Grand Bank⁶ has a population of 12,540, which deviates from the quotient by -7.5%.

This is an example of a district that begins at the tip of a peninsula, as discussed in Section 5.2. The proposed district boundary encompasses the road network that loops around the bottom portion of the Burin Peninsula. There is considerable travel around this loop by residents, who share a significant community of interests. To ensure that the proposed district was within the 10% quotient range, however, it was necessary to divide the town of Marystown. The Commission chose natural dividers – three water bodies - for the boundary.

Here is the other area for the initial proposal where statisticians working with the Commission had to divide Census Canada population blocks to estimate the number of people living in the proposed district. Because this is a rural district located at the tip of a peninsula, in setting the boundaries the Commission considered a lower district population appropriate.

The proposed name recognizes two towns in the district, one on either side of the peninsula. “Burin,” which also recognizes the peninsula itself, has been an electoral district name since 1832. “Grand Bank” has been an electoral district name since 1975.

7.14 PLACENTIA WEST – BELLEVUE

The proposed district of Placentia West – Bellevue⁷ has a population of 13,559, which deviates from the quotient by +0.1%.

The southern boundary of the proposed district is shared with Burin – Grand Bank, and the western boundary is shared with Fortune Bay – Cape La Hune. The northern boundary is just north of Goobies, which is where the Burin Peninsula Highway intersects with the Trans-Canada Highway. The Commission recognized that people travelling off the Burin Peninsula are more likely to turn east at Goobies and travel towards the Avalon Peninsula than to travel west. The eastern boundary of the proposed district is on the eastern side of the Isthmus of Avalon. This is

6 This district was revised for the final proposal. See Section 10.4.

7 This district was revised for the final proposal. See Section 10.4.

a natural geographical divide that keeps the communities on the isthmus, which have a close geographical connection, in the same district.

The proposed name recognizes that the district includes the western half of Placentia Bay and the isthmus community of Bellevue. “Placentia” has been an electoral district name since 1832. “Bellevue” has been an electoral district name since 1975.

7.15 TERRA NOVA

The proposed district of Terra Nova has a population of 14,275, which deviates from the quotient by +5.4%.

The southern boundary of the proposed district is shared with Placentia West – Bellevue. The communities of Southwest Arm and Random Island, just to the north of that boundary, have significant economic ties with the town of Clarenville, which is the largest community in the district. The proposed district encompasses Terra Nova National Park and the communities and islands of and around the Eastport Peninsula. It also includes the community of Glovertown, which is a significant service centre for the communities at the northern end of the proposed district.

As will be discussed below with respect to the proposed district of Bonavista, the Commission chose to keep the Bonavista Peninsula within a single district, rather than establishing a north-south divide and including the northern half with the communities in and around the Eastport Peninsula. In making this decision, the Commission considered the driving time required to cross the proposed district and noted that the distance from St. Brendan’s to Southwest Arm was less than the distance from St. Brendan’s to Bonavista.

The proposed name recognizes the national park located in the district. “Terra Nova” has been an electoral district name since 1975.

7.16 BONAVIDA

The proposed district of Bonavista has a population of 12,591, which deviates from the quotient by -7.1%.

The Commission chose to keep the Bonavista Peninsula intact within a district. There is a significant community of interests on the peninsula itself and a looped road network that ties the communities together. As discussed above with respect to the proposed district of Terra Nova, the Commission also considered driving times through the proposed districts. The Commission recognized that the communities from George’s Brook-Milton to Burgoyne’s Cove, which are in this proposed district, have close economic and non-economic ties with Clarenville, which is in

the proposed district of Terra Nova. The decision to divide these communities between districts was largely governed by the quotient.

The proposed district is named for the peninsula it comprises and the bay to its north. “Bonavista” has been used in an electoral district name since 1832.

7.17 GANDER

The proposed district of Gander has a population of 14,802, which deviates from the quotient by +9.2% (final proposal: 14,725, +8.7%).

The Commission chose to keep the town of Gander intact. It also chose to keep within the same district the communities of Glenwood and Appleton, as there are significant economic and non-economic connections between them and Gander. Gambo was also included in the district. This decision was primarily governed by demands of the quotient in this and the neighbouring proposed districts of Terra Nova and Fogo – Cape Freels. Because the town of Gander is urban and is centrally located in the proposed district, the Commission considered a positive deviation from the quotient appropriate.

The proposed name recognizes the town, lake and river of the same name. “Gander” has been an electoral district name since 1956.

7.18 FOGO – CAPE FREELS

The proposed district of Fogo – Cape Freels⁸ has a population of 14,035, which deviates from the quotient by +3.6%.

This proposed district includes the communities of the north side of Bonavista Bay, New-Wes-Valley, the Straight Shore, Hamilton Sound, Change Islands and Fogo Island. The southern boundary is shared with the proposed district of Gander, and the western boundary is just west of Port Albert, which is near the ferry terminal for Change Islands and Fogo Island. The western boundary was governed both by the quotient and the Commission’s desire to keep the road network that primarily services the communities of the proposed district within a single district. Although the islands of Fogo and Twillingate are currently in the same district, there is historical precedent for their separation: from 1885 to 1996 they were in different districts.

8 This district was renamed Fogo Island – Cape Freels for the final proposal.

The proposed name recognizes Fogo Island and the easternmost cape of the proposed district. “Fogo” has been used in electoral district names since 1832. This would be the first such use of “Cape Freels.”

7.19 LEWISPORTE – TWILLINGATE

The proposed district of Lewisporte – Twillingate has a population of 13,439, which deviates from the quotient by -0.8% (final proposal: 13,501, -0.4%).

This proposed district includes New World Island, the Twillingate Islands, Lewisporte and the communities of the eastern portion of the Bay of Exploits that are connected by road. The eastern boundary is shared with the proposed district of Fogo – Cape Freels. The western boundary follows a natural geographical divide: the longest arm of the Bay of Exploits.

The proposed name acknowledges the two largest communities in the district. “Lewisporte” was first used as an electoral district name in 1928. “Twillingate” has been used in electoral district names since 1832.

7.20 GRAND FALLS-WINDSOR

The proposed district of Grand Falls-Windsor⁹ has a population of 13,725, which deviates from the quotient by +1.3%.

As discussed in Section 5.2, in cases where the population of an urban or other major centre did not exceed the 10% quotient range, the Commission endeavoured not to divide the centre between districts. Grand Falls-Windsor is an example. The proposed district is defined by the municipal boundary of that community.

The proposed district is named for the town that comprises it. “Grand Falls” has been an electoral district name since 1928.

7.21 EXPLOITS

The proposed district of Exploits¹⁰ has a population of 12,471, which deviates from the quotient by -8.0%.

9 This district was revised for the final proposal. See Section 10.6.

10 This district was revised for the final proposal. See Section 10.6.

Because the Commission proposed the town of Grand Falls-Windsor as a distinct district, the boundaries for the proposed district of Exploits were largely governed by the quotient. The populations of Badger, Buchans and environs are insufficient to form a district within the 10% range. As a result, the Commission decided to include Bishops Falls and the communities of Notre Dame Bay connected to it by the road network to the north. Since this is a large and primarily rural district, in setting the boundaries the Commission considered a lower district population appropriate.

The proposed district is named for the Exploits River that runs through it from Red Indian Lake to the Bay of Exploits. “Exploits” has been the name of an electoral district since 1975.

7.22 BAIE VERTE – GREEN BAY

The proposed district of Baie Verte – Green Bay has a population of 13,773, which deviates from the quotient by +1.6%.

The proposed district encompasses the Baie Verte Peninsula and the communities of the western portion of Notre Dame Bay, which are linked by a common road and ferry network distinct from that servicing the communities to the east. The largest community in the district is the town of Springdale.

The proposed name recognizes the name of the peninsula and the bay that runs along its eastern coast. “Green Bay” first appeared as an electoral district name in 1928 and was used consistently until 1996. “Baie Verte” has been used since 1975.

7.23 PLACENTIA – ST. MARY'S

The proposed district of Placentia – St. Mary's¹¹ has a population of 13,773, which deviates from the quotient by +1.6%.

The western boundary is shared with the proposed district of Placentia West – Bellevue. The northern boundary extends just past the community of Cavendish. An analysis of spatial mobility patterns revealed a flow of people from Cavendish and south of Cavendish to the Trans-Canada Highway and Whitbourne. The northern boundary travels along the Trans-Canada Highway, which is an obvious dividing line between this proposed district and the communities of Conception Bay. The proposed district contains the eastern side of Placentia Bay and the communities of St. Mary's Bay, which have been historically situated in the same electoral district. The eastern boundary runs from the Trans-Canada Highway to Western Head, just west of the community of St. Shott's, which is contained in the district of Ferryland.

11 This district was revised for the final proposal. See Section 10.7.

The proposed name has a long history: “Placentia – St. Mary’s” was first used as an electoral district name in 1832.

7.24 FERRYLAND

The proposed district of Ferryland has a population of 14,007, which deviates from the quotient by +3.4%.

This proposed district generally comprises the area known as the “Southern Shore” and the communities of Trepassey Bay. It includes St. Shott’s and Petty Harbour-Maddox Cove and contains all of the communities in between. It also includes the Witless Bay Line. Because of the demands of the quotient, the proposed district also includes the portion of St. John’s just south of the Ruby Line, historically known as the community of Goulds.

The proposed name “Ferryland” is the only electoral district name in the Province that has been used without variation or interruption since 1832.

7.25 WATERFORD VALLEY

The proposed district of Waterford Valley has a population of 14,601, which deviates from the quotient by +7.8%.

The southern boundary of the proposed district is shared with the proposed district of Ferryland. From the northern municipal boundary of Petty Harbour-Maddox Cove, the proposed district of Waterford Valley runs along the east coast of the Avalon Peninsula to St. John’s Harbour. It runs along the south side of the harbour, along the Waterford River and then along major thoroughfares: Pitts Memorial Drive, Water Street, Sudbury Street, Hamilton Avenue, Cornwall Avenue, Topsail Road, Brookfield Road, Commonwealth Avenue, Robert E. Howlett Memorial Drive and Ruby Line. Waterford Valley shares boundaries with the proposed districts of St. John’s Centre, St. John’s West, Mount Pearl North and Mount Pearl – Southlands. The proposed district includes Fort Amherst and Cape Spear. Because this is primarily an urban district, the Commission deemed a positive deviation from the quotient appropriate.

The proposed name recognizes the valley of the Waterford River, which runs through the proposed district.

7.26 ST. JOHN'S CENTRE

The proposed district of St. John’s Centre has a population of 14,354, which deviates from the quotient by +5.9%.

This proposed district shares a boundary with the proposed district of Waterford Valley. It also shares a boundary with the proposed district of St. John's West along Columbus Drive, the proposed district of Mount Scio along Old Pennywell Road and Empire Avenue, and the proposed district of St. John's East – Quidi Vidi along Freshwater Road, Long's Hill, Queen's Road, New Gower Street, Waldegrave Street, Harbour Drive and Steers Cove. This is an urban district, and so the Commission deemed a positive deviation from the quotient appropriate.

The proposed name recognizes that this district comprises the centre area of the city of St. John's. "St. John's" has been used in electoral district names since 1832. "St. John's Centre" was first used as a district name in 1956.

7.27 ST. JOHN'S EAST – QUIDI VIDI

The proposed district of St. John's East – Quidi Vidi has a population of 14,443, which deviates from the quotient by +6.6%.

This proposed district shares a boundary with the proposed district of St. John's Centre. It runs along the north side of St. John's Harbour to North Head and then northerly along the coast to Quidi Vidi Harbour, where it continues along Quidi Vidi River, the southern shoreline of Quidi Vidi Lake, and Rennie's River to King's Bridge Road. It shares a boundary with the proposed district of Virginia Waters – Pleasantville along King's Bridge Road, Kenna's Hill and Torbay Road; the proposed district of Pippy Park along MacDonald Drive and Prince Phillip Drive; and the proposed district of Mount Scio along Allandale Road, Bonaventure Avenue and Mayor Avenue to Empire Avenue. Because this is an urban district, the Commission deemed a positive deviation from the quotient appropriate.

The proposed district name recognizes that this proposed district comprises the eastern area of the city of St. John's and acknowledges the geographical and cultural significance of Quidi Vidi Lake. "St. John's East" was first used as an electoral district name in 1855. "Quidi Vidi" was first used in an electoral district name in 1996.

7.28 VIRGINIA WATERS – PLEASANTVILLE

The proposed district of Virginia Waters – Pleasantville has a population of 14,152, which deviates from the quotient by +4.4%.

This proposed district shares a boundary with the proposed district of St. John's East – Quidi Vidi and the proposed district of Pippy Park along Torbay Road and the Outer Ring Road. Its boundary runs along the northern shoreline of Quidi Vidi Lake. It also shares a boundary with the proposed district of Cape St. Francis along the municipal boundaries of St. John's and Logy Bay-Middle Cove-Outer Cove. Because this is an urban district, the Commission deemed a positive deviation from the quotient appropriate.

The proposed district name recognizes the major body of water in the area, Virginia Lake, which is in the north end of the proposed district, and Pleasantville, which is in the south end. “Virginia Waters” was first used as an electoral district name in 1996. “Pleasantville” was first used in 1975.

7.29 PIPPY PARK

The proposed district of Pippy Park¹² has a population of 14,187, which deviates from the quotient by +4.7%.

The proposed district shares boundaries with the proposed districts of St. John’s East – Quidi Vidi and Virginia Waters – Pleasantville. It shares a boundary with the proposed district of Mount Scio along Allandale Road, Outer Ring Road, and Thorburn Road; the proposed district of Portugal Cove – Bell Island along the municipal boundary between St. John’s and Portugal Cove-St. Philip’s; and the proposed district of Cape St. Francis along the municipal boundary between St. John’s and Torbay and between St. John’s and Logy Bay-Middle Cove-Outer Cove. The district includes Windsor Lake and much of Pippy Park. Because this is an urban district, the Commission deemed a positive deviation from the quotient appropriate.

The proposed name recognizes Pippy Park, the 1,376-hectare urban park largely contained within the proposed district boundaries. This would be the first such use of the name for an electoral district.

7.30 MOUNT SCIO

The proposed district of Mount Scio has a population of 14,482, which deviates from the quotient by +6.9%.

The proposed district shares boundaries with the proposed districts of St. John’s Centre, St. John’s East – Quidi Vidi and Pippy Park. It shares a boundary with the proposed district of Portugal Cove – Bell Island along the municipal boundary between St. John’s and Portugal Cove-St. Philip’s and between St. John’s and Paradise. It shares a boundary with the proposed district of Topsail – Paradise along the municipal boundary between St. John’s and Paradise to the Trans-Canada Highway and then along the Trans-Canada Highway to Kenmount Road. The boundary of the proposed district of Mount Scio then runs along Kenmount Road, adjacent to the proposed districts of Mount Pearl North and St. John’s West, to Columbus Drive, and then along

12 This district was renamed Windsor Lake for the final proposal.

Columbus Drive to Old Pennywell Road. This last portion of the proposed boundary is shared with the proposed district of St. John's West.

Part of the town of Paradise, known as Elizabeth Park, is contained within this district. This decision was principally dictated by the demands of the quotient, although the Commission felt that residents of this area of Paradise had a significant community of interests with the residents of St. John's in the same general area. Because this is an urban district, the Commission deemed a positive deviation from the quotient appropriate.

The proposed district name recognizes the major geographical feature of the area: Mount Scio. "Mount Scio" was first used as an electoral district name in 1975.

7.31 ST. JOHN'S WEST

The proposed district of St. John's West has a population of 14,028, which deviates from the quotient by +3.5%.

The proposed district shares boundaries with the proposed districts of Waterford Valley, St. John's Centre and Mount Scio. It shares a boundary with the proposed district of Mount Pearl North, which commences at the intersection of Brookfield Road and the Waterford River and continues along the Waterford River to its intersection with the municipal boundary between St. John's and Mount Pearl. It continues along that municipal boundary to Mount Carson Avenue and continues along Mount Carson Avenue to Kenmount Road. Because this is an urban district, the Commission deemed a positive deviation from the quotient appropriate.

The proposed name recognizes that this proposed district comprises the western area of the city of St. John's. "St. John's West" was first used as a district name in 1855.

7.32 MOUNT PEARL NORTH

The proposed district of Mount Pearl North¹³ has a population of 14,142, which deviates from the quotient by +4.4%.

The proposed district shares boundaries with the proposed districts of Waterford Valley, St. John's West and Mount Scio. Its boundary with the proposed district of Topsail – Paradise follows the municipal boundary between Mount Pearl and Paradise. The proposed district of Mount Pearl North shares a boundary with the proposed district of Mount Pearl – Southlands, which starts at the intersection of the Trans-Canada Highway and Pitts Memorial Drive and continues along the latter to Ruth Avenue. The boundary then follows Ruth Avenue, Roosevelt

13 This district was revised for the final proposal. See Section 10.8.

Avenue, St. Andrew's Avenue, Second Street, Sunrise Avenue and Commonwealth Avenue to its intersection with Brookfield Road. Although the Commission preferred to keep boundaries along major thoroughfares, in this case the Commission chose to move the boundary to secondary roads in order to maintain parity of quotient deviation between the proposed districts of Mount Pearl North and Mount Pearl – Southlands. This is consistent with the current district boundary. Mount Pearl North is an urban district and so the Commission deemed a positive deviation from the quotient appropriate.

The proposed district primarily comprises the northern area of Mount Pearl, but it also includes the Brookfield Plains neighbourhood of St. John's. People living in Brookfield Plains must enter and exit the area using Mount Pearl's road network and thus they have a significant connection with that city.

The proposed name recognizes that this proposed district primarily comprises the northern half of the city of Mount Pearl. "Mount Pearl" was first used as an electoral district name in 1975 and "Mount Pearl North" was first used in 2007.

7.33 MOUNT PEARL – SOUTHLANDS

The proposed district of Mount Pearl – Southlands¹⁴ has a population of 14,052, which deviates from the quotient by +3.7%.

The proposed district shares boundaries with the proposed districts of Ferryland, Waterford Valley and Mount Pearl North. It shares a boundary with the proposed district of Conception Bay South along the Trans-Canada Highway. Because this is an urban district, the Commission deemed a positive deviation from the quotient appropriate.

The proposed district primarily comprises the southern area of Mount Pearl, but it also includes the neighbourhood of Southlands and South Brook. Although these are part of the city of St. John's, the primary road to the nearest commercial areas connects them to Mount Pearl. Residents of Southlands and South Brook travel to Mount Pearl for work, school, shopping and other activities.

The proposed name recognizes that this proposed district comprises the southern half of the city of Mount Pearl and the St. John's neighbourhood of Southlands. "Mount Pearl" was first used as an electoral district name in 1975. This would be the first such use of "Southlands."

14 This district was revised for the final proposal. See Section 10.8.

7.34 CAPE ST. FRANCIS

The proposed district of Cape St. Francis has a population of 13,215, which deviates from the quotient by -2.5%.

This is another district that begins at the tip of a peninsula. The proposed district comprises the communities north of St. John's: Logy Bay-Middle Cove-Outer Cove, Torbay, Flatrock, Pouch Cove and Bauline. Its boundary runs along the municipal boundaries of St. John's and Portugal Cove-St. Philip's. Given the more rural nature of the district, the Commission deemed a negative deviation from the quotient appropriate.

The proposed name recognizes the most significant geographical feature of this portion of the Avalon Peninsula. "Cape St. Francis" was first used as an electoral district name in 1996.

7.35 PORTUGAL COVE – BELL ISLAND

The proposed district of Portugal Cove – Bell Island has a population of 14,885, which deviates from the quotient by +9.9%.

The proposed district shares a boundary with the proposed district of Cape St. Francis along the municipal boundary of Portugal Cove-St. Philip's and a boundary with the proposed districts of Pippy Park and Mount Scio. It shares a boundary with the proposed district of Conception Bay South, which starts at the eastern shoreline of Conception Bay and runs along the municipal boundary between Conception Bay South and Paradise to Topsail Road. It then runs along Topsail Road, St. Thomas Line, Lanark Drive (current road and proposed), Archibald Drive, Paradise Road and Camrose Drive.

The proposed district includes Bell Island, Portugal Cove-St. Philip's and an area of Paradise around St. Thomas Line. Its population is at the upper limit of the 10% deviation from the quotient. This results from the populations of its neighbouring districts and the Commission's desire to maintain district boundaries along municipal boundaries and major thoroughfares where possible.

The proposed name recognizes both a significant historical community in the district and the major island that is located within it. "Bell Island" was first used as an electoral district name in 1928. This would be the first such use of "Portugal Cove."

7.36 TOPSAIL – PARADISE

The proposed district of Topsail – Paradise has a population of 14,830, which deviates from the quotient by +9.4%.

The proposed district shares boundaries with the proposed districts of Portugal Cove – Bell Island, Mount Scio and Mount Pearl North. It shares a boundary with the proposed district of Conception Bay South, which begins at the intersection of Topsail Road and the municipal boundaries of Conception Bay South and Paradise. The boundary then runs along Topsail Road, the Manuels Arterial Road, and the Manuels Bypass Highway (route 2) to the Trans-Canada Highway. The proposed district includes the town of Paradise except for the area of Elizabeth Park, which is in the proposed district of Mount Scio, and an area around St. Thomas Line, which is in the proposed district of Portugal Cove – Bell Island. The proposed district of Topsail – Paradise also includes most, but not all, of the part of the town of Conception Bay South which was historically known as the community of Topsail. All of Topsail could not be included because of the demands of the quotient. Because this is an urban district, the Commission deemed a positive deviation from the quotient appropriate.

The proposed name recognizes that the proposed district comprises most of the town of Paradise and the community of Topsail. “Topsail” was first used as an electoral district name in 1996. This would be the first such use of “Paradise.”

7.37 CONCEPTION BAY SOUTH

The proposed district of Conception Bay South has a population of 14,563, which deviates from the quotient by +7.5% (final proposal: 14,558, +7.4%).

The proposed district shares boundaries with the proposed districts of Portugal Cove – Bell Island, Topsail – Paradise, Mount Pearl – Southlands and Ferryland. The boundary with Mount Pearl – Southlands and Ferryland is along the Trans-Canada Highway. The Commission felt that the relatively few St. John’s residents who live in the area between the municipal boundary of Conception Bay South and the Trans-Canada Highway share a significant community of interests with the residents of Conception Bay South, and that it was appropriate to include them in this district. The proposed district also shares a boundary with the proposed district of Harbour Main, which begins at the Trans-Canada Highway and then follows a straight line along the Lower Gullies River, the Conception Bay Highway (route 60) and Anthonys Road to the shores of Conception Bay.

The proposed name recognizes that the district primarily comprises the town of Conception Bay South. “Conception Bay South” was first used as an electoral district name in 1975.

7.38 HARBOUR MAIN

The proposed district of Harbour Main has a population of 14,880, which deviates from the quotient by +9.8% (final proposal: 14,885, +9.9%).

The proposed district shares a boundary with the proposed district of Conception Bay South. The southern and eastern boundaries of the proposed district follow the Trans-Canada Highway, which naturally corrals the communities of what is commonly referred to as Conception Bay Centre. The western boundary follows straight lines north and then east to the Veterans Memorial Highway. It then follows the municipal boundaries of North River and Clarke's Beach to the waters of Conception Bay. The proposed district comprises Conception Bay Centre and, at either end, smaller portions of Conception Bay North and South. Although the Commission recognized that those communities of Conception Bay North have a strong connection to Bay Roberts and other communities to the north, and that residents of Conception Bay South have a strong connection to the other residents of their town, it was necessary to include these areas within Harbour Main to satisfy the quotient requirement. The population of this district, which includes Holyrood and is adjacent to Conception Bay South, is at the upper limit of the 10% deviation.

The proposed name recognizes the historical community in the central part of the proposed district. "Harbour Main" was first used as an electoral district name in 1885.

7.39 HARBOUR GRACE – PORT DE GRAVE

The proposed district of Harbour Grace – Port de Grave has a population of 14,838, which deviates from the quotient by +9.5% (final proposal: 14,848, +9.6%).

The proposed district shares a boundary with the proposed district of Harbour Main. It then extends north and then east to the municipal boundary of Harbour Grace, which it follows to the waters of Conception Bay. This district includes the two major regional centres of Harbour Grace and Bay Roberts; its population is near the upper limit of the 10% deviation.

The proposed name recognizes the district's most northern community, Harbour Grace, and its most southern community, Port de Grave. "Harbour Grace" was first used as an electoral district name in 1885 and it was used consistently until 1996. "Port de Grave" has been consistently used in an electoral district name since 1885.

7.40 TRINITY – CARBONEAR

The proposed district of Trinity – Carbonear¹⁵ has a population of 14,230, which deviates from the quotient by +5.0%.

The proposed district’s southern boundary is with the proposed districts of Placentia – St. Mary’s and Harbour Grace – Port de Grave. The district starts at a tip of the Bay de Verde Peninsula and includes Carbonear, the major service centre for the area. Like all the other proposed districts on the Avalon Peninsula (other than Cape St. Francis), Trinity – Carbonear has a positive deviation from the quotient.

The proposed name recognizes the bay to the west of the district and its major centre. “Trinity” has been used in electoral district names since 1832. “Carbonear” has been used since 1855.

8.0 NOTICE OF PROPOSAL AND PUBLIC ENGAGEMENT

8.1 ADVERTISEMENT OF NOTICE

Pursuant to section 19 of the Act, on April 11, 2015, the Commission gave notice to the public by advertising in *The Telegram* and *The Western Star* newspapers the schedule of public sittings for the hearing of representations from interested persons. The advertisement, the content of which is attached as **Appendix 6**, included the following information:

- (a) time and place of public sittings
- (b) boundary descriptions and maps of the proposed electoral districts
- (c) proposed district names
- (d) populations of the proposed districts

In addition, the schedule of public sittings and instructions on obtaining additional information were published in a number of regional newspapers. The list of newspapers is attached as **Appendix 7**. The proposal was also sent to all incorporated municipalities, local service districts, MHAs, provincial members of Parliament and provincial political parties. Finally, the Commission promoted the public sittings on its website, and via Twitter, press releases, and advertising space on radio stations and on TC Transcontinental Media websites.

The advertised proposal, maps of each proposed district, and maps showing the proposed boundaries overlaid with the current boundaries were also posted on the Commission’s website.

15 This district was revised for the final proposal and it was renamed Trinity – Bay de Verde. See Section 10.7.

8.2 PUBLIC SITTINGS

As noted in Section 6.0, the Commission held two types of sittings: in-person and virtual. There were seven in-person sittings, where the Commissioners were present in the same meeting space as the public. To ensure compliance with the Act, the Commission held at least one in-person sitting in Newfoundland and at least one in Labrador. There were five virtual sittings, for which a meeting space was provided in the designated community for the public to attend and the Commissioners then conducted the sitting via video link from a public meeting space in St. John's. For virtual sittings, the public was invited to both venues. A person could make a presentation about a district in or near the community in which the virtual sitting was being held, although presenters were not restricted as to which districts they wished to address.

The Commission developed procedures for attendance at public sittings. These were posted on the Commission's website, sent to parties who had contacted the office to register to make a submission, and made available during the public sittings. The Commission requested that interested parties provide a written summary of their submissions at least three days in advance of the sitting.

A list of the dates and locations of the public sittings and the presenters at each is attached as **Appendix 8**.

8.3 SKYPE SESSION

The Commission made itself available for Skype video calls with the public. Members of the public could register in advance for a video call. On May 2, 2015, the Commission used Skype to call those who had registered. This was the last opportunity for the public to appear before the Commission.

8.4 OTHER METHODS

In addition to public sittings and the Skype session, the Commission received feedback from the public by email, fax, letter, comment form submitted on the website, and telephone calls on the toll-free submission line.

9.0 REPRESENTATIONS AND SUBMISSIONS FROM THE PUBLIC

The Commission received submissions and comments from the public on the advertised proposal until May 8, 2015. The Commission is grateful to all those that took the time to consider the proposal and submit feedback.

9.1 LEVEL OF ENGAGEMENT

The Commission received over 185 submissions from a broad cross-section of communities of interest, including municipalities, local service districts, chambers of commerce, joint councils, MHAs and other interested individuals and associations. All methods of engagement offered by the Commission were used by the public.

Over 230 people attended public sittings; of those, 68 presented to the Commission. Most presenters pre-registered. Once all the pre-registered participants had spoken, the Chairperson invited others present to make comments if they wished. A number of people took advantage of this opportunity.

The public sittings held in Corner Brook and Whitbourne attracted the most people, while those in Happy Valley-Goose Bay, St. John's and Conception Bay South drew the fewest. Marystown had the most presenters, followed closely by Stephenville. This was consistent with the general trend of submissions: the majority came from the areas in rural Newfoundland most affected by the proposal.

All public sittings other than the one in Corner Brook were held during the day. The Commission recognized that evening sittings would have been more accessible for those with daytime employment and might have resulted in greater participation.

Although the sittings conducted over a video link generally worked well, there was some technical difficulty with the Stephenville session, which had to be completed by teleconference. Even with that exception, the people who presented were able to communicate effectively with the Commission. Given the 120-day time frame, the Commission could not have held 12 public sessions without the use of modern technology. The Commission was pleased to be able to hold that many sittings, but acknowledged that the virtual sittings did not permit the pre- and post-session interaction between the Commissioners and the public that took place during in-person sittings.

To the best of the Commission's knowledge, this was the first time that Skype or a similar technology was used by a public entity in the Province for public consultation. Skype has been used by Canadian courts and was used in 2013 by the Canadian Radio-television Telecommunications Commission for public consultation on the Wireless Code. Other entities have probably used Skype for similar purposes. Although only two participants registered for Skype video calls, and only one ultimately made a presentation using Skype, the Commission believes that the technology worked well. Skype is an efficient and cost-effective way to communicate with people around the Province.

Although computer-based methods of communication (email or webpage comment form) were the ones most frequently used, 15 people took advantage of the recorded toll-free phone line.

Not everyone uses a computer, and this more traditional form of communication proved to be important for broad public engagement.

9.2 COMMON THEMES

It is not practical to discuss in this report each of the submissions received. However, the submissions can be organized by topic into five major groups: (i) the Act, (ii) the Commission's procedures, (iii) guiding principles for the proposal, (iv) specific boundary or community concerns and (v) names. Within these groups, common themes emerged. The most significant themes are organized by topic and summarized below. The summary is not intended to be an exhaustive accounting of all submissions received.

9.2.1 THE ACT

The Commission's mandate was to propose a division of the Province into 40 electoral districts. The mandate did not include an evaluation of the Act, amendments to which were introduced in the House of Assembly as Bill 42. Despite such an evaluation being outside the Commission's mandate, many members of the public made representations with respect to Bill 42.

The reaction to the reduction of the number of districts in the Province was mixed. Some people were in favour of a reduction and some were against it. Some believed that the Commission should have been asked to recommend the appropriate number of districts.

Similarly, the reaction to maintaining four seats in Labrador was mixed. Several people commented on the uniqueness of Labrador and its four distinct regions currently represented by the four electoral districts. Others believed that maintaining the number of seats in Labrador while reducing the number of seats in Newfoundland was unfair, perhaps even unconstitutional. Submissions from Labrador were universally in favour of maintaining the four seats, while submissions from Newfoundland were mixed.

Most people who commented on the Commission's 120-day time frame felt it was insufficient for the task. Others, however, felt it was sufficient.

Several people criticized the Commission's circulation of a proposal prior to public consultations as mandated by section 19 of the Act. Most of these people would have preferred two sets of public consultations: one prior to an initial proposal and one following its publication.

A significant number of submitters felt that voter parity was given too much weight by the Commission. Although these people generally felt that parity was a factor to consider, they urged greater weight be given to human factors. Many commented on the special circumstances faced in rural Newfoundland, the need to keep communities with historical ties together in the same

district, and the importance of not mixing people with different community interests within the same district.

A few submitters felt that the 2011 Census numbers were too dated to be relied upon. It was generally accepted that the population of rural Newfoundland has likely decreased since 2011 and that the population of the more urban regions has increased. A few submitters also felt that given the aging population of rural Newfoundland, it was unfair to assume in calculating the quotient, as required by section 15(5) of the Act, that the proportion of electors to the general population is constant throughout the Province.

Even though many people were in favour of a reduction in the number of seats for the Province, the most common submission to the Commission was a request to leave the submitter's district as it currently is. This was not a universal request, however. A number of submitters agreed with the proposed change for their area.

9.2.2 THE COMMISSION'S PROCEDURES

The Act gives the Commission authority to make rules for regulating its proceedings. The Commission used this authority to determine the places and times of public sittings and to set procedures for those sittings.

As noted, the Commission held 12 public sittings, 5 of which were virtual sittings. Some presenters felt that the number of sittings was inadequate; some expressed frustration that the Commission did not hold a sitting in a particular community; some were opposed to any of the sittings being held virtually; and others were pleased to have the opportunity to appear before the Commission, either in person or virtually.

Because the time allotted for each public sitting was limited, the Commission requested that presentations be kept to a maximum of ten minutes, followed by questions from the Commission. The Commission advised the public in advance that more or less time might be allotted to presenters, depending on how many presenters registered. Because only one of the sessions was fully booked, the Commission was able to offer more time to presenters who needed it. Although the Commission was satisfied that all those who presented had enough time to make their views known, and no one was prevented from presenting for longer than ten minutes, a few presenters did not appreciate any limits being imposed.

The Commission asked presenters to provide a written submission or summary of their presentation in advance of the public sittings. Most presenters did this. Others provided the Commission with written material on the day of the sitting or shortly thereafter. The Commission found it very helpful to have these materials and appreciated people's efforts. Regardless of whether or not they provided something in writing, all presenters were welcomed to make oral submissions. A small number of presenters objected to being asked to provide a written summary of their comments.

9.2.3 GUIDING PRINCIPLES FOR THE PROPOSAL

The approach and guiding principles the Commission used to develop its initial proposal are described in Section 5.0. The Commission summarized this approach for the public during the webinar it held on April 16, 2015, which was subsequently archived on the Commission's website. A brief summary of the guiding principles was provided by the Chairperson at the outset of each public sitting. A number of the public submissions directly or indirectly addressed the guiding principles adopted by the Commission. These submissions are summarized below.

As discussed in Section 5.2, the Commission considered it more acceptable to have positive deviations from the quotient in urban and more densely populated areas, and negative deviations in rural and more remote areas. The Commission recognized that rural ridings are more challenging to serve because of difficulties in transportation and communications. The courts have also recognized that rural voters make greater demands on their elected representatives, possibly because they do not have access to the alternative resources available in urban centres. This position was supported by many submissions.

The Commission heard submissions about the difficulty of travelling lengthy stretches of highway in inclement weather and the long distances required to traverse some proposed districts. Many submitters noted that for people living in areas with no municipal council, MHAs are the first point of contact for many issues that arise. They also noted that rural MHAs usually have a number of communities to service, as opposed to urban MHAs, who may have only one (or even a portion of one). Although most presenters felt this greatly increases a rural MHA's workload, this view was not universally held. At least one urban MHA felt that the workloads of rural and urban MHAs are equivalent, although travel time to and within districts for rural MHAs is a greater burden.

Many presenters said that rural Newfoundland was disproportionately affected by the reduction in seats from 48 to 40. It is true that many rural districts are proposed to become geographically larger. Some submitters were aware that if one were to take only the quotient into account, there would be 19 districts on the Avalon Peninsula and 17 districts in the rest of Newfoundland, as opposed to the 18 seats in each as the Commission has proposed. Nevertheless, many still felt this was unfair to rural areas. Other submissions raised the opposite concern. In particular, one presenter emphasized the importance of voter parity, pointing out that under-representation in more urban districts means that voters in these areas have less say in electing the Province's government. He highlighted that an MHA is elected not just to represent his or her district but also to represent the Province as a whole, and so it is important that all electors have an equal voice in selecting MHAs.

Many presenters urged the Commission to make greater use of the “special geographic considerations” exemptions found in sections 15(3) and 15(3.1) of the Act. A number of submitters provided alternative proposals, either for a particular area or for the entire Province.¹⁶ Almost all these alternative proposals included more districts that deviated from the quotient by greater than 10% or 25% than did the Commission’s proposal. Some of the proposals included rural districts with positive population deviations close to or in excess of 10%. In some cases, submitters presented proposals for a group of districts that maintained an average district quotient deviation of less than 10% within the group but deviated from the quotient by more than 10% for the individual districts. In its initial proposal, the Commission used the section 15(3.1) exemption of greater than 25% deviation only once, for Fortune Bay – Cape La Hune. The Commission received submissions suggesting that the exemption be used in four additional areas of the Province.

Many submitters suggested that the section 15(3) and 15(3.1) exemptions be used where they felt “special considerations” existed, such as a desire to keep two communities together, or to avoid dividing a community or region between districts. Some submitters did not distinguish between “special geographic considerations,” as set out in the Act, and the broader concept of “special considerations.”

As noted in Section 5.2, the Commission endeavoured to keep urban and rural areas in distinct districts, although this was not always possible. A number of people agreed with this approach and expressed concern about districts that included a mix of urban and rural areas. Some took the opposite view and requested that urban areas be divided even though such a division was not required to stay within the quotient.

9.2.4 SPECIFIC BOUNDARY OR COMMUNITY CONCERNS

Many submitters gave input with respect to particular districts or areas, and common themes were found among these submissions. Although this report does not describe every submission, the geographic areas that were most commonly addressed are reviewed below.

9.2.4.1 *The Northern Peninsula*

The Commission’s initial proposal included within the St. Barbe – White Bay district the communities of Eddies Cove West, Port au Choix, Port Saunders, Hawke’s Bay and River of Ponds. At least three submitters, including the Regional Council for the area, felt these communities more properly belong in the proposed district of Gros Morne. The submitters acknowledged that removing these communities from St. Barbe – White Bay would result in that

¹⁶ Two people provided the Commission with detailed 40 district proposals; one of them provided two such proposals. This took considerable time and effort and the Commission was appreciative of their submissions.

district being more than 10% below the quotient. More than one presenter suggested that section 15(3.1) of the Act be employed to create a district on the Northern Peninsula that departs from the quotient by more than 25%.

9.2.4.2 *Bay of Islands, Corner Brook and the Southwest Coast*

The Commission received considerable feedback on the proposed districts of Humber North, Corner Brook, Humber South – St. George’s, Stephenville – Port au Port, and Burgeo – La Poile. The submissions were not all consistent with each other, but common themes did emerge.

First, several submitters were opposed to the Bay of Islands being divided between the proposed districts of Humber North and Humber South – St. George’s because of a significant community of interests among the people who live along that bay.

Second, a number of submitters did not feel there was sufficient community of interests between the Bay of Islands/Humber region and the St. George’s region to warrant having those regions in the same district, as was proposed by the Commission. Although this view was not universally held, many felt that the two areas have different economic bases (one being primarily the fishery and the other agriculture) and different cultural heritages (St. George’s having significant aboriginal and French heritages), and that they generally do not share many services. Many people also felt that having the two regions in the same district made for too large a district geographically.

Third, people from the Southwest Coast were generally happy with their current electoral districts, including the division of Stephenville between two districts, and did not want much, if any, change.

In addition to the above general themes, the City of Corner Brook also expressed concern that the city’s watershed and major industries, including the pulp and paper mill and the port, were outside the proposed district of Corner Brook.

The Commission received a number of alternative proposals for the districts of this area, some of which included proposed districts that deviated from the quotient by greater than 10% or even 25%.

9.2.4.3 *The Burin Peninsula*

The Commission heard from many residents of the Burin Peninsula, particularly with respect to its proposal to divide Marystown between two electoral districts. Submitters urged the Commission to keep Marystown intact within one district. Many submitters proposed alternatives. Some recommended that the entire town of Marystown be included in the Burin – Grand Bank district, even if that district would then be more than 10% over the quotient. Others wanted all of

Marystown within the Placentia West – Bellevue district, although many also felt strongly that the proposed Placentia West – Bellevue district was already too large and unmanageable, particularly because of the range of industries located within the district. Some submitters suggested that the maximum 10% quotient deviation could be maintained by moving all of Marystown to Placentia West – Bellevue and by moving some of the communities of Fortune Bay that were proposed to be in Placentia West – Bellevue to the proposed district of Burin – Grand Bank. Others believed that was not a viable option.

9.2.4.4 *The Eastport Peninsula and Clarenville*

The Commission heard from a number of submitters who disagreed with the proposal to include Glovertown and the Eastport Peninsula in the same electoral district as Clarenville. Generally, those who held this view felt that the Glovertown/Eastport area was more closely tied to Gander, for health care, shopping and other services, than to Clarenville. There was also concern that the interests of the proposed Terra Nova district would be dominated by those of the more densely populated area in and around Clarenville. Those in the northern part of the proposed Terra Nova district also expressed concern about being physically isolated from the more densely populated southern part by Terra Nova National Park.

The Commission also received submissions that the communities along Smith Sound from George’s Brook-Milton to Burgoyne’s Cove should be in the same district as Clarenville because that is the major work and service hub for the area. The proposal placed those communities in the Bonavista district.

9.2.4.5 *Grand Falls-Windsor, Buchans and Badger*

Although submissions were generally in favour of the concept of Grand Falls-Windsor being a single district, submitters expressed concerns about the effect that this might have on the surrounding area (proposed as the district of Exploits). Many felt that the proposed district of Exploits was too large. People of the interior communities of Buchans, Badger, Buchans Junction and Millertown felt that because of their strong economic ties with Grand Falls-Windsor, they should be included in the same district. Two alternatives were proposed to the Commission. The first was to add those interior communities to the proposed district of Grand Falls-Windsor and have that district exceed the quotient by more than 10%. The second was to divide Grand Falls-Windsor so that its western portion formed a district with the interior communities and its eastern portion formed a district with Bishop’s Falls and the communities of Notre Dame Bay. Some submitters cautioned the Commission against dividing the town of Grand Falls-Windsor along its historical community lines: it was generally felt that since the former towns of Grand Falls and Windsor had been amalgamated successfully, dividing them between electoral boundaries would be a step backward.

9.2.4.6 *The Bay de Verde Peninsula*

The Commission heard from a number of people from the Bay de Verde Peninsula. Some expressed concern that in the proposed district of Trinity – Carbonear the interests of smaller communities would be dominated by the interests of Carbonear. Some requested that Carbonear and Harbour Grace be maintained in the same electoral district. Others requested that specific communities be kept in districts with other communities with which they have strong historical ties. For example, there were submissions that the communities of Makinsons, South River, Clarke’s Beach and North River be kept in the same district as Bay Roberts and Port de Grave. Similarly, there were submissions requesting that Bristol’s Hope remain in the same district as Harbour Grace.

The Commission heard the most submissions in this area from the people of the Trinity Bay communities of Cavendish, Whiteway, Green’s Harbour, Hopeall and New Harbour. The initial proposal included all of these communities in the proposed district of Placentia – St. Mary’s. The prevailing view of the submitters was that these communities should be kept in a district with other Trinity Bay communities or other Bay de Verde Peninsula communities, rather than being in a district that ran south of the Trans-Canada Highway to Placentia Bay. They did not feel that including their communities within the proposed district of Placentia – St. Mary’s recognized their historical or current community ties.

9.2.4.7 *The Northeast Avalon*

The Commission received comments about various districts in this area of the Avalon Peninsula, although no major themes emerged. Specific submissions were made requesting adjustments to the boundaries between St. John’s East – Quidi Vidi and Virginia Waters – Pleasantville, and between Mount Pearl North and Mount Pearl – Southlands. Two submitters raised concerns about the urban area of Goulds being included in the same district as the rural communities of the Southern Shore in the proposed district of Ferryland.

9.2.5 DISTRICT NAMES

The Commission received over 25 submissions with respect to district names. Many were well researched, informative and compellingly presented.

10.0 COMMISSION CONSIDERATION OF REPRESENTATIONS

The Commission reviewed all submissions it received. Submissions that were outside the Commission’s mandate were recorded, but no action was considered or taken other than outlining them above. The Commission considered all suggestions that were within its mandate.

Some suggestions resulted in changes that were incorporated into the Commission's final proposal, and others informed the Commission's recommendations. The Commission has not recorded all its deliberations in this report. The more significant deliberations, and all that resulted in changes to the proposal as initially advertised, are discussed below.

10.1 THE QUOTIENT AND SPECIAL GEOGRAPHIC CONSIDERATIONS

The Commission decided to maintain all districts other than Burgeo – La Poile and Fortune Bay – Cape La Hune within 10% of the quotient. Submitters from many areas of Newfoundland asked the Commission to recognize “special geographic circumstances” that would warrant use of the exemptions of sections 15(3) or 15(3.1). The Commission accepted that these and other areas of Newfoundland present governance challenges caused by their accessibility, size or shape. Because there are so many such regions, the Commission could not accept that any other than the two districts already identified were truly “special” or exceptional, as required for sections 15(3) or 15(3.1).

Ultimately, variation from the quotient is a zero sum game: if one region is over-represented in the House of Assembly, another is under-represented. The Commission accepted that over-representation – that is, negative deviation from the quotient – is acceptable and even desirable to achieve effective representation for rural and more remote districts. However, the number of such districts and the extent of their over-representation must be balanced against the rights of those in the under-represented districts. A positive deviation from the quotient in a given district means that the vote of an elector in that district has less weight than the vote of the average elector in the Province. Voting rights should not be diluted without legitimate and compelling reasons.

Although the Commission determined that positive deviation from the quotient is necessary in 22 of the 36 districts in Newfoundland, 18 of these are primarily urban districts or districts located on the Avalon Peninsula. In three of the four other districts with positive deviations, the deviation is less than 4%. The exception is Terra Nova, which has a positive deviation of 5.4%. Many submitters suggested creating rural and fairly remote districts with positive deviations that exceeded 10% (or even 25%), usually in order to preserve common interests within districts. The Commission was sympathetic to these concerns, but could not justify the resulting under-representation. Voter parity is of paramount importance.

10.2 MIXED RURAL AND URBAN AREAS

Feedback from the public on this topic was mixed. Some smaller communities urged the Commission to keep them in the same electoral districts as the larger centres that service their area. Many larger towns were likewise pleased to have smaller communities within the same electoral boundaries. Others urged the Commission to maintain electoral districts that kept larger

centres separate from smaller communities. Ultimately, the realities of geography and population distribution dictated that neither position could be universally satisfied.

10.3 BAY OF ISLANDS, CORNER BROOK AND THE SOUTHWEST COAST

The Commission altered its proposal for this area as a result of feedback from the public. The initial proposals for the districts of Humber North, Corner Brook, Humber South – St. George's and Burgeo – La Poile were affected by the revisions. In the final proposal, those four districts have been replaced with the following four districts.

10.3.1 ST. GEORGE'S – GRAND LAKE

The proposed district of St. George's – Grand Lake has a population of 12,974, which deviates from the quotient by -4.3%.

This district runs generally south along the Trans-Canada Highway from just north of Pynn's Brook to just north of Cape Ray. It includes the communities of Bay St. George and the Codroy Valley. St. George's – Grand Lake shares its boundary with the proposed district of Gros Morne to the north. To the east and south it shares boundaries with the new proposed district of Grand Falls-Windsor – Buchans and the new proposed district of Burgeo – La Poile. To the west it shares its boundary with the proposed district of Stephenville – Port au Port and the new proposed districts of Corner Brook and Humber – Bay of Islands.

As evidenced by materials provided to the Commission, the communities of the proposed St. George's – Grand Lake district share significant common agricultural interests. Although the district is approximately 240 kilometres long, all of its communities are located within approximately 20 kilometres of the Trans-Canada Highway. Because this is a large and mainly rural district, the Commission deemed a negative deviation from the quotient appropriate.

The proposed name now recognizes Grand Lake, the major water body at the district's northern end. This would be the first use of "Grand Lake" in an electoral district name.

10.3.2 CORNER BROOK

In the revised proposal, the district of Corner Brook has a population of 13,718, which deviates from the quotient by +1.2%.

The boundary no longer runs along the utility line but instead stays on the Lewin Parkway until it reaches the Trans-Canada Highway. This change added approximately 600 people to the district and was possible because changes made in the neighbouring proposed districts kept them within the 10% quotient range. The district was enlarged geographically to encompass some unpopulated areas and to include the Port of Corner Brook and the pulp and paper mill.

Because this is an urban district, the Commission deemed a positive deviation from the quotient appropriate.

10.3.3 HUMBER – BAY OF ISLANDS

The proposed district of Humber – Bay of Islands has a population of 13,412, which deviates from the quotient by -1.0%.

This district shares a northern boundary with the proposed district of Gros Morne and a southern boundary with the proposed district of Stephenville – Port au Port. It also shares boundaries with the new proposed districts of Corner Brook and St. George’s – Grand Lake.

The proposed Humber – Bay of Islands district keeps the south and north shores of the Bay of Islands intact within one district. It is a mixed urban and rural district, with just less than half of its population living in the city of Corner Brook. Because of this, the Commission deemed a slight negative deviation from the quotient appropriate.

The addition of “Bay of Islands” to the proposed name recognizes the inclusion of the entire bay in the district. “Bay of Islands” was first used as an electoral district name in 1975.

10.3.4 BURGEO – LA POILE

In the revised proposal, the district of Burgeo – La Poile has a population of 8,933, which deviates from the quotient by -34.1%.

The Codroy Valley region has been removed from the district and added to St. George’s – Grand Lake, as discussed above. Consequently, no change is being proposed to the current district of Burgeo – La Poile. The population deviates negatively from the quotient by more than 25%, which is permitted by section 15(3.1) of the Act. In its final proposal, therefore, the Commission is using both of the exemptions permitted by this section. The deviation is warranted in this proposed district because of special geographic considerations. Burgeo – La Poile, as revised, covers a geographic area of 12,085 km² and includes communities that are not connected by road. Those communities rely on ferry service. The proposed district is large, sparsely populated, remote and difficult to access.

10.4 THE BURIN PENINSULA

As a result of feedback from the public, the Commission altered its proposal for this area. The initial proposals for the districts of Placentia West – Bellevue and Grand Bank – Burin have been revised. In the revised proposals, it is no longer necessary to divide Census Canada population blocks to estimate the number of people living in these proposed districts.

10.4.1 PLACENTIA WEST – BELLEVUE

In the revised proposal, the district of Placentia West – Bellevue has a population of 13,554, which deviates from the quotient by 0.0%.

There was a strong and unified public appeal that the town of Marystown not be divided between districts. The Commission agreed that it is preferable that communities with populations less than the quotient, such as Marystown, be kept intact within electoral districts. But the Commission was not prepared to dilute the votes of the residents of Grand Bank – Burin by adding all of Marystown to the proposed district. Such a change would have resulted in a district population of 17,070, a quotient deviation of +26.0%. No special geographic considerations exist in Grand Bank – Burin to justify such a deviation from the 10% quotient range. The proposed district is smaller than many rural districts, but it is not the smallest. It does not include any urban area and, being located at the tip of the Burin Peninsula, is remote. Also, the Commission drew a distinction between negative and positive deviations. Negative deviations are more readily justified by special geographic considerations than are positive ones. Positive deviations equate to under-representation. It would be very difficult, if not impossible, to justify the under-representation of voters that would be represented by a +26% deviation.

The Commission also rejected the idea of keeping the town of Marystown intact within the proposed district of Placentia West – Bellevue by simply moving the portion of Marystown in the initially proposed Burin – Grand Bank into Placentia West – Bellevue. Placentia West – Bellevue, as initially proposed, already had a positive quotient deviation, albeit of only +0.1%. Including all of Marystown within Placentia West – Bellevue would have brought the deviation to +7.7%, making it the rural district with the greatest positive quotient deviation. Given the size, shape and accessibility of the district, the Commission could not justify such a large positive departure from the quotient. The change would also have resulted in the proposed Burin – Grand Bank district deviating from the quotient by more than -10%.

To keep the quotient of both these districts within the 10% range, the revised proposal for Placentia West – Bellevue includes all of the town of Marystown, and the revised proposal for Burin – Grand Bank includes the Fortune Bay communities of Harbour Mille, Little Harbour East, Little Bay East, Bay L'Argent, St. Bernard's and Jacques Fontaine. A road connects these Fortune Bay communities to the Burin Peninsula Highway. There is a strong community of interests within this group of communities and the revised proposal keeps that intact. The change results in the proposed district of Burin – Grand Bank being geographically larger, as it now extends up the western side of the Burin Peninsula.

10.4.2 BURIN – GRAND BANK

In the revised proposal, the district of Burin – Grand Bank has a population of 12,545, which deviates from the quotient by -7.4%.

The changes for the district are discussed above with respect to the revised proposal for the district of Placentia West – Bellevue.

10.5 THE EASTPORT PENINSULA AND CLARENVILLE

The Commission did not alter its proposal for this area. The Commission understood and accepted that the people of Glovertown and the Eastport Peninsula are more closely tied to Gander for health care, shopping and other services than to Clarenville. Glovertown and the communities of the Eastport Peninsula have a different socio-geographic interaction zone than the people who live in and around Clarenville. As noted in Section 5.2.1, the populations of almost all recognized socio-geographic interaction zones in the Province are considerably less than the quotient. As a result, in some areas, such as the proposed district of Terra Nova, the Commission has joined such zones with others to create a district.

Although the Commission preferred to keep such zones fully intact within individual districts, there were occasions when population distributions dictated they be dispersed among two or more districts. The town of Gander has almost enough people to be its own electoral district. As a result, some of the smaller communities that form part of Gander's socio-geographic interaction zone had to be located in other districts. Similarly, it was not possible to keep all the communities within Clarenville's socio-geographic interaction zone, such as those along Smith Sound, in the same district as Clarenville.

The concerns voiced by the people of the Eastport Peninsula, Clarenville, and surrounding areas were echoed in many other parts of the Province. Some people in smaller communities expressed concern that their voices will be dominated by the more densely populated areas of their proposed districts. Generally, people in less densely populated areas of districts worry that their MHA will not visit their communities often enough. The Commission acknowledges these concerns. However, its mandate to propose 40 electoral districts for a province that currently has 48 made it inevitable that the proposed rural districts would be larger and mix communities of interests.

10.6 GRAND FALLS-WINDSOR AND THE INTERIOR

The Commission altered its proposal for this area as a result of feedback from the public. The initially proposed districts of Exploits and Grand Falls-Windsor have been replaced with Exploits and Grand Falls-Windsor – Buchans.

Although the Commission preferred to keep urban centres with populations below the quotient intact within a district, the submissions made by the people of the area, including the Town of Grand Falls-Windsor, were compelling and could be accommodated without breaching the 10% quotient ranges or causing a domino effect in neighbouring districts.

10.6.1 EXPLOITS

In the revised proposal, the district of Exploits has a population of 12,667, which deviates from the quotient by -6.5%.

The district includes a portion of the town of Grand Falls-Windsor. The district boundary within the town runs along the Trans-Canada Highway, Scott Avenue, Grenfell Heights, Finn Avenue and Brown Avenue. Bishop's Falls and the communities of Notre Dame Bay and the Bay of Exploits, connected to Grand Falls-Windsor by the road network to the north, are also included in the district as it is now proposed. Because there is a significant rural area within this district, the Commission deemed a negative deviation from the quotient appropriate.

10.6.2 GRAND FALLS-WINDSOR – BUCHANS

In the revised proposal, the district of Grand Falls-Windsor – Buchans has a population of 13,539, which deviates from the quotient by -0.1%.

This district as proposed now includes the majority of the town of Grand Falls-Windsor. The boundary within the town is as described above. The communities of Buchans, Millertown, Buchans Junction, Millertown Junction and Badger are also included within the district as currently proposed.

“Buchans” has been added to the proposed district name to recognize the addition of this, the most western community in the district. “Buchans” was first used in an electoral district name in 1975.

10.7 THE BAY DE VERDE PENINSULA

The Commission altered its proposal for this area as a result of feedback from the public.

Many of the concerns raised by the people of the Bay de Verde Peninsula were similar to those raised in the areas of Eastport, Clarendville and elsewhere: people wanted their socio-geographic interaction zones left intact within a district and did not want their zone mixed with other zones.

The Commission was sympathetic to these requests but was not always able to accommodate them. For example, Bristol's Hope is in the same socio-geographic interaction zone as the town of Harbour Grace. The electoral districts proposed for Conception Bay are among the most

populated in the Province. Harbour Grace – Port de Grave, in particular, has a quotient deviation of +9.6%. The Commission could not include Bristol's Hope within Harbour Grace – Port de Grave without breaching the upper end of the 10% quotient range. Maintaining the 10% deviation range would require shifting population to the neighbouring district of Harbour Main, which already has a population quotient deviation of +9.9%. Remedying this would require change in the neighbouring district of Conception Bay South, and so on, which illustrates the domino effect mentioned earlier.

Although the people of Harbour Grace and Bristol's Hope preferred to be in the same district, this would require breaching the upper 10% quotient range. The Commission considered that option but could not justify using the exemption of section 15(3) because no special geographic considerations are present that are not also present in many other parts of Newfoundland. To put it another way, the proposed district of Harbour Grace – Port de Grave is already one of the most under-represented districts in the Province. The Commission decided that keeping Bristol's Hope and Harbour Grace in the same electoral district was not sufficient justification for further diluting the voting power of the residents of that district. For similar reasons, the Commission was unable to accommodate the request that the communities of Makinsons, South River, Clarke's Beach and North River be kept in the same district as Bay Roberts and Port de Grave.

The Commission was able to at least partially address the concerns of one area of this region. The communities of Cavendish, Whiteway, Green's Harbour, Hopeall and New Harbour made a compelling appeal to be kept in a district with other Trinity Bay communities, or other Bay de Verde Peninsula communities, rather than being in a district that ran south of the Trans-Canada Highway to Placentia Bay. Although the demands of the quotient prevented the Commission from accommodating the request in relation to all five communities, the Commission revised its initial proposal in order to move the northernmost communities of Cavendish and Whiteway from the district of Placentia – St. Mary's to the district of Trinity – Bay de Verde.

10.7.1 TRINITY – BAY DE VERDE

In the revised proposal, the district of Trinity – Bay de Verde has a population of 14,891, which deviates from the quotient by +9.9%.

The boundary of this proposed district is as initially proposed, with the following change: the southern boundary on the Trinity Bay side of the district has been moved south from just north of Cavendish to the southern boundary of the municipality of Whiteway. This proposed district remains at the upper limit of 10% deviation from the quotient.

The name of the proposed district was changed to recognize the historical use of "Bay de Verde", which has been in electoral district names since 1855.

10.7.2 PLACENTIA – ST. MARY’S

In the revised proposal, the district of Placentia – St. Mary’s has a population of 13,102, which deviates from the quotient by -3.3%.

The only change in the boundary as it was proposed initially is as described in relation to Trinity – Bay de Verde. Because this is a geographically large and mainly rural district, the Commission deemed a negative deviation from the quotient appropriate.

10.8 THE NORTHEAST AVALON

After considering public feedback for the Northeast Avalon, the Commission decided that changes were warranted for only two districts: Mount Pearl North and Mount Pearl – Southlands.

As discussed in Section 7.32, the Commission preferred to keep boundaries along major thoroughfares. However, in order to maintain a parity of quotient deviation in its initial proposal, the Commission placed the boundary between the proposed districts of Mount Pearl North and Mount Pearl – Southlands along the secondary streets of Roosevelt Avenue, St. Andrew’s Avenue, Second Street and Sunrise Avenue. This was consistent with the current boundaries. The MHA for Mount Pearl South asked the Commission to relocate the boundary to major thoroughfares in the area. In his experience, electors and those working for candidates and MHAs found it confusing to have these secondary streets divided between districts. The Commission appreciated this concern and was able to accommodate the request while maintaining elector parity between the two Mount Pearl districts, as described below.

10.8.1 MOUNT PEARL – SOUTHLANDS

In the revised proposal, the district of Mount Pearl – Southlands has a population of 14,004, which deviates from the quotient by +3.4%.

The district has the same boundaries as initially proposed with two exceptions. First, instead of running along the secondary streets of Roosevelt Avenue, St. Andrew’s Avenue, Second Street and Sunrise Avenue, the boundary now runs along Ruth Avenue to Commonwealth Avenue. Second, the boundary now leaves Ruth Avenue near O’Donel High School and runs along a series of walking paths before returning to Ruth Avenue. The walking paths generally run behind Wellington Crescent, Marconi Place and Sunrise Avenue. Because this is an urban district, the Commission deemed a positive deviation from the quotient appropriate.

10.8.2 MOUNT PEARL NORTH

In the revised proposal, the district of Mount Pearl North has a population of 14,190, which deviates from the quotient by +4.7%.

The only changes to the boundaries proposed initially are with Mount Pearl – Southlands, as described above. Because this is an urban district, the Commission deemed a positive deviation from the quotient appropriate.

10.9 OTHER DISTRICT NAME CHANGES

The Commission made the following other changes to its proposed district names after considering submissions from the public:

<u>Initially Proposed Name</u>	<u>Revised Proposed Name</u>
Fogo – Cape Freels	Fogo Island – Cape Freels
Pippy Park	Windsor Lake
St. Barbe – White Bay	St. Barbe – L’Anse aux Meadows

The word “Island” has been added to the proposed name for Fogo Island – Cape Freels to clarify that the reference is to Fogo Island and not the community.

The proposed name for the district initially proposed as “Pippy Park” has been changed to “Windsor Lake” to recognize the major water body of the district and the water source for many of its residents. This would be the first use of “Windsor Lake” as an electoral district name.

The proposed name for the district initially proposed as “St. Barbe – White Bay” has been changed to include “L’Anse aux Meadows”, a community at its most northern tip with international cultural and historical significance. This would be the first use of “L’Anse aux Meadows” in an electoral district name.

11.0 COMMISSION PROPOSAL

Appendix 1 contains a summary of the Commission’s final proposal, including district names, populations and deviations from the quotient. **Appendix 2** contains the Commission’s complete final proposal for the division of the Province into 40 one-member electoral districts, including district names, boundary descriptions, district populations, district areas, deviations from the quotient where applicable, and maps.

Because of the adjustments to districts discussed in Section 10.3, minor changes to the boundary descriptions of the initial proposal had to be made for some of the adjacent districts. This did not affect the population of these districts. As a result of the Commission's final review, the population of some districts changed from what was initially proposed and some small changes were made to the legal descriptions of some proposed districts. The changes to population numbers were minor and none resulted in a breach of the 10% quotient range. For its final proposal, the Commission had to split census population dissemination blocks in order to estimate the number of people living on each side of a proposed boundary in two areas: between Mount Pearl North and Mount Pearl – Southlands, and between Corner Brook and Humber – Bay of Islands.

12.0 RECOMMENDATIONS

The Commission makes the following recommendations either for future commissions to consider or for potential amendment of the Act.

1. The Commission recommends that more than 120 days be allocated for any future commission, particularly one mandated to propose changes to the number of electoral districts. Had advances in mapping and geographic information software not enabled this Commission to evaluate different boundary scenarios far more quickly than previous commissions were able to, the timeline would likely not have been met. The Commission also had the advantage of dedicated staff and other personnel who were willing and able to devote many weekend and other overtime hours to the project. Without their efforts, the 120 day timeline would likely not have been met. Furthermore, had the Commission's work not proceeded as smoothly as it did, the timeline may not have been met as 120 days left little or no margin for error.

By taking advantage of video conferencing technology, the Commission was able to hold 12 public sittings. Because so many Newfoundlanders and Labradorians now have Internet access, more than 185 people were able to have their opinions heard. The Commission believes it was able to engage the public effectively and that all those who wanted to provide input had an opportunity to do so. Nevertheless the Commission would have preferred to have been able to hold more in-person sittings.

2. The Commission recommends that the places and number of public sittings be at the commission's discretion. The Commission noted that even though the Act mandated little or no change be made to the districts in Labrador, it was compelled to hold a public sitting there. The Commissioners chose not to risk failing to comply with the Act and voiding their work by conducting that sitting by video link. Although the Commission was keenly aware of the special circumstances of Labrador, it would have preferred to use its own discretion to determine whether an in-person sitting in Labrador was the best use of the limited time available.

3. The Commission recommends that section 19 of the Act be reviewed and potentially amended. The section requires that notice of the public sittings and the entire initial proposal be published in at least one newspaper of general circulation in the Province. Significant changes in the newspaper publishing industry in recent years have reduced the circulation of *The Telegram* and ceased the distribution in the Province of the print version of *The Globe and Mail*. Some “general circulation” newspapers have ceased operation altogether. Many people now only read online versions of newspapers. The cost of publication in print newspapers is high compared to that of many other public communication methods. The objective of section 19 is to ensure that residents of the Province receive notice of the proposal and the public sittings. There are now many ways this can be accomplished, including advertising on the Commission’s website, through social media, on the radio and in widely circulated newspapers. The advertisement need not necessarily include the full proposal, as long as it is readily available and the public is advised where to find it. Section 19 could be amended to reflect the current reality of news and information dissemination in the Province and to give greater discretion to future commissions on how to achieve its objective.
4. The Commission recommends that future electoral boundary revisions be undertaken closer to the publication of census data. As mandated by the Act, the Commission used 2011 census data. At the time of the Commission’s work, this data was approximately four years old. Censuses are currently undertaken every five years, with the next scheduled for 2016. A commission operating within 12 months or less of census publication would be able to ground decisions about electoral boundaries in information that is more accurate.

13.0 SUBMISSION OF REPORT

The 2015 Newfoundland and Labrador Electoral Districts Boundaries Commission unanimously and respectfully submits this report to the Minister of Justice and Public Safety.

