



July 29, 2016

Honourable Danielle Larivee  
Minister of Municipal Affairs  
204 Legislature Building  
10800 – 97 Avenue  
Edmonton, AB T5K 2B6

Dear Minister Larivee:

AAMDC and AUMA recently received information from your ministry on the process for the development and approval of regulations associated with the Municipal Government Act. We appreciate the opportunity to draw your attention to two key shortcomings.

Firstly, the tight timelines and intensive work required to complete the review of all draft regulations prior to the 2017 municipal elections will stress the capacity of municipal associations, municipalities, the province, and stakeholders to complete the process effectively and in a meaningful manner. This creates a risk that important discussions are cut short and that the resulting regulations will not be well thought out or will have gaps. The AAMDC and AUMA urge the province to work with municipal associations to prioritize regulations in the event that they cannot all be completed according to the proposed schedule.

Secondly, the role of municipalities in this process – as just one of many voices at the table alongside business and industry – is not in keeping with the degree of relevance that the MGA regulations have to local government nor does it recognize our role as an elected government. While we recognize the important insights that the business community can bring to the table, the MGA regulations need, first and foremost, to be a collaborative effort government to government between the province and municipalities. We are therefore suggesting an alternative consultation process:

- Creation of a proposed “straw dog” regulation through a government-to-government process involving the province and municipal associations.
- Discussion of the proposed “straw dog” regulation through working group meetings, including municipal and business interests.

.../2

- Public comment period on the proposed regulation.
- Finalization of the regulation through a government-to-government process involving the province and municipal associations.

Given that this model would require more check in points than the present process, it is possible that not all MGA regulations would be signed off and in place by the 2017 municipal elections. A prioritization process, undertaken in partnership with AAMDC and AUMA, would help to identify the regulations that must advance before the 2017 municipal elections and those that could be postponed should the need arise. It is the joint viewpoint of AAMDC and AUMA that an expanded government-to-government process is preferable as it will deliver the end result that Alberta's municipalities need, even if this means the delay of some regulations.

Thank you for the opportunity to participate in this important process. The review of the MGA and related regulations is a vital step to ensuring the continued prosperity of communities across Alberta. We look forward to working with the province to ensure that this process delivers optimal results for all Albertans.

Sincerely,



Al Kemmere  
AAMDC President



Lisa Holmes  
AUMA President