



February 26, 2018

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

Dear Minister Anderson:

Throughout the nearly decade-long process of reviewing the Municipal Government Act, AUMA has stressed the importance of making changes to enable the accurate enumeration of shadow populations. Municipalities across Alberta find that the current process is inaccurate and burdensome, resulting in unequal access to population-based municipal funding programs.

Given the extensive history of advocacy on the matter, it is disappointing that amendments to the Determination of Population Regulation released in October 2017 fail to address municipal concerns. In order to accurately reflect shadow populations, further amendments are necessary to:

- Broaden the definition of a shadow population count;
- Modify the definition of “usual residence” to align with the Local Authorities Election Act;
- Allow municipalities to determine if and when they wish to do a census of their shadow population (i.e. remove required population thresholds); and,
- Review the requirement for the shadow population to be either greater than 1,000 persons or 10 per cent of the population in order to ensure this requirement is not detrimental to smaller municipalities.

The accurate enumeration of shadow populations is a vital exercise to ensure that all Albertans have access to high quality local services without placing an unsustainable financial burden on municipalities. AUMA strongly urges the Government of Alberta to further review and amend the Determination of Population Regulation to address the above concerns.

Sincerely,

Barry Morishita  
AUMA President

cc: Al Kemmere, President, Alberta Association of Municipal Districts and Counties

If you would like to discuss this matter further, please feel free to contact me by email at [president@auma.ca](mailto:president@auma.ca) or my cell phone at (403) 363-9224.