



**RMA**  
RURAL MUNICIPALITIES  
of ALBERTA

**Bill 28:**  
***Municipal Affairs  
and Housing Statutes  
Amendment Act, 2026***

**Rural Municipal  
Impact Analysis**

June 2026



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## Understanding Bill 28

[Bill 28: Municipal Affairs and Housing Statutes Amendment Act, 2026](#) received Royal Assent on May 14, 2026. The Bill amends the *Municipal Government Act* (MGA), the *Alberta Housing Act*, the *Libraries Act*, and the *Municipal Affairs Statutes Amendment Act, 2025*. Bill 28 introduces a wide range of amendments across several areas of municipal responsibility:

- ◆ **Growth and Housing:** Reduced municipal autonomy related to planning and development
- ◆ **Aggregate Pits:** Limits municipal ability to regulate development of aggregate pits
- ◆ **Seniors Housing:** Broadens reserve requirements and requisitioning scope related to seniors and social housing, and increases power of Minister to determine reserve levels and requisition responsibilities
- ◆ **Assessment and Property Tax:** Adjustments to regulated assessment and taxation authority
- ◆ **Governance and Accountability:** Creation of a new councillor accountability framework and updates to municipal governance processes
- ◆ **Municipal Transparency:** Expanded reporting, disclosure, and information-sharing requirements
- ◆ **Public Institutions:** New oversight mechanisms for libraries and governance of municipal utilities

Following Bill 28's introduction in April 2026, RMA released an [initial summary and analysis document](#) to provide members and other stakeholders with a general understanding of the wide range of changes made in the Bill, its potential impacts on rural municipalities, and outstanding questions.

### *Municipal Impacts*

Further analysis of Bill 28 confirms RMA's original position: as a whole, the Bill continues multi-year Government of Alberta (GOA) focus on reducing municipal autonomy, centralizing authority and shifting power and decision-making on local issues away from municipalities. Alongside recent omnibus bills such as Bills 20 and 50, and related legislation like Bill 19, Bill 28 reflects a continued trend of provincial intervention in local governance. Bill 28 also introduces uncertainty into municipal planning and governance processes by providing the GOA significant discretion over when and to what extent it will exercise its new powers to proactively limit or reactively over-rule municipal plans or decisions.

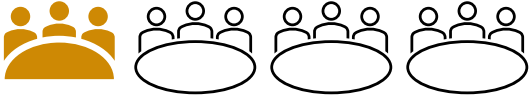



Bill 28 also shifts additional costs and risks onto municipalities, and by extension, local residents and businesses. While many Bill 28 changes reflect lobbying efforts of specific industry sectors, the benefits those sectors may receive in the form of reduced regulatory requirements will be borne by everyone else, a reality that the GOA has either not considered or does not deem important enough to inform their municipal policy approach.

The changes in Bill 28 are wide-ranging and varied. Some will have major impacts on urban municipalities, with little relevance in a rural context. For others, the opposite is true. Additionally, a small number of changes are positive for rural municipalities. While Bill 28 will have different impacts across the province, as a whole it undermines the ability of all municipalities to effectively serve local residents and businesses.





## How to Use this Document

Building on RMA’s initial Bill 28 summary and analysis, this document is intended to provide members, stakeholders, and government with an understanding of the immediate or potential impacts various changes will have on municipalities, and by extension, all Alberta residents and businesses. For each significant change introduced in Bill 28, the document includes the following:

- ◆ Summary of change: A short overview of what changed. For a more detailed explanation refer to RMA’s initial summary and analysis document.
- ◆ Autonomy impacts (ranked for each issue out of four): If and to what extent does the change pose a risk to the ability of municipal councils to make local decisions at the local level?

Low autonomy impact		Immediate or potential impacts on municipal decision-making are minimal.
Some autonomy impact		Depending on implementation details, municipalities will likely incur some level of reduced autonomy in relation to governance, planning, decision-making, etc.
Significant autonomy impact		Local autonomy will likely be reduced for most, if not all, municipalities as a result of the change, though the degree of impact will vary by municipality.
Extreme autonomy impact		The change poses an immediate or potentially fundamental threat to municipal autonomy and removes municipal involvement on issues that have clear and significant local impacts. The voices of municipalities and individual residents will be lost or significantly weakened as a result of the change.

- ◆ Cost impacts (ranked for each issue out of four): If and to what extent does the change introduce a risk of increased costs for municipalities, and by extension, all Alberta residents and businesses?

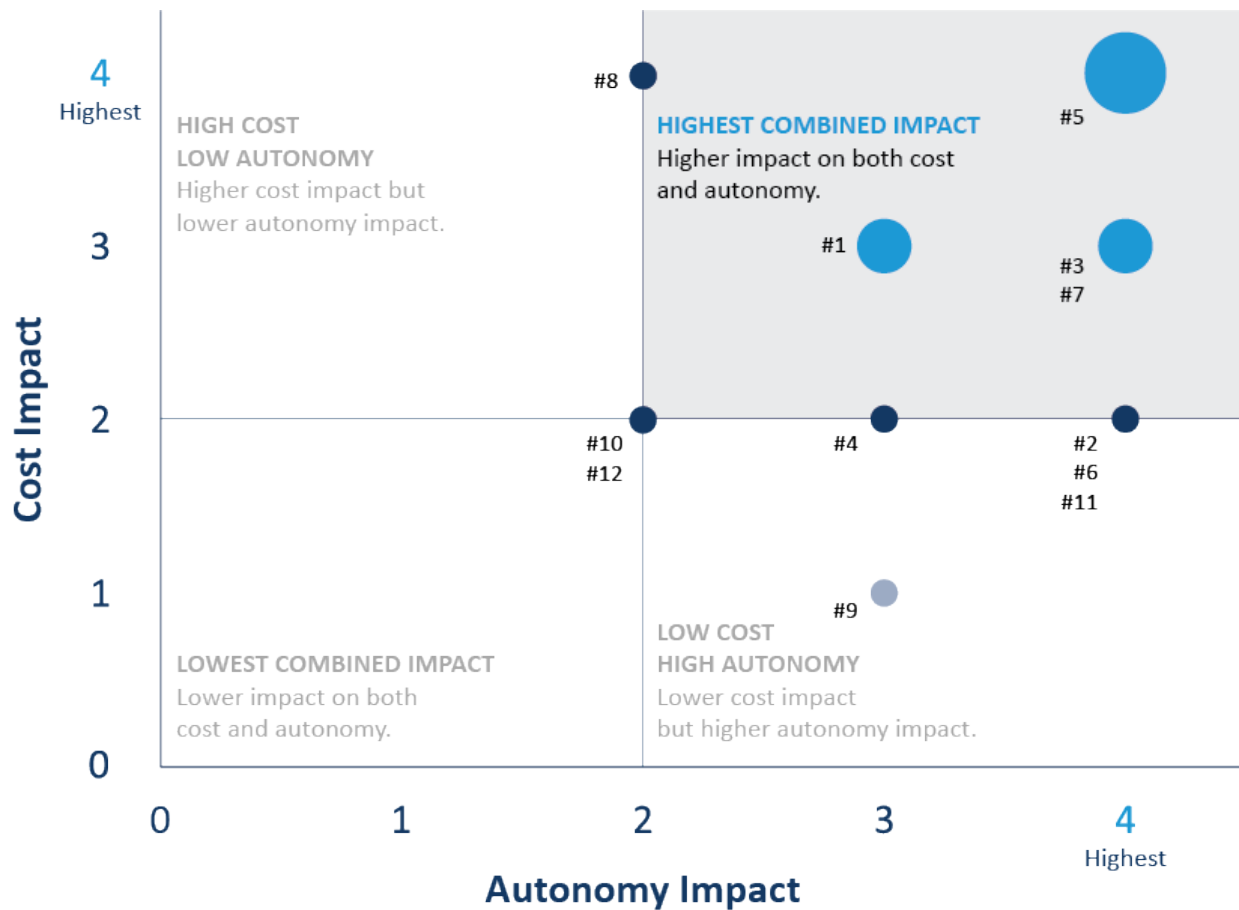
Low cost impact		Immediate or potential cost implications are minimal for municipalities and property owners.
Some cost impact		Depending on implementation details, some municipalities or property owners could incur significant costs as a result of the change.
Significant cost impact		Some or all municipalities or property owners are likely to incur cost impacts as a result of the change. The extent of the cost impacts are dependent on implementation details.
Extreme cost impact		Most or all municipalities will incur significant cost impacts as a result of the change.

- ◆ Outstanding questions or unknowns: What information is required to better understand the change?
- ◆ RMA go-forward priorities: How does RMA plan to advocate in relation to this issue moving forward?

Please note that not all Bill 28 changes are included in this document, as the focus is on those with the most direct impacts on local costs and autonomy.

## The Overall Impact of Bill 28



The graph below plots each of the changes in the document based on the cost and autonomy impacts (out of 4). Those situated at the top right quadrant of the graph have the largest combined impact.





#1	“Automatic Yes” and Automated Systems, S. 640(2)	#7	Primacy of Provincial Approvals for Aggregate Pits, S. 619.1
#2	Regulation-Making Authority Related to Development Applications and Permits, S. 694	#8	Requisition Scope and Reserve Requirement Changes, S. 1, 7, 7.1, 34 (Alberta Housing Act)
#3	Community Design Codes, S. 640.3	#9	Property Tax Sub-Class Prohibition, Ss. 297 & 297.1
#4	Off-Site Levy Restrictions, S. 648(2.11)	#10	Ministerial Authority Over Municipal Dissolution Decisions, S. 130.1
#5	Authority Over Municipal Public Utility Governance, S. 44.1	#11	Councillor Accountability Framework, S. 146.01-09
#6	Expanded Ministerial Oversight of Public Libraries, S. 39, 40, and 40.1 (Libraries Act)	#12	Public Disclosure of Employee Compensation, Ss. 215.1-7

## Enabling Growth and Housing

### 1. “Automatic Yes” and Automated Systems, S. 640(2)

Summary	
<ul style="list-style-type: none"> <li>Enables municipalities to use automated permitting systems for making decisions on and issuing development permits.</li> <li>Provides Minister with power to develop regulation requiring one, some, or all municipalities to use automated permitting system.</li> <li>Described by Ministry staff as intended to apply to “routine or low-risk” development permits; because Bill 28 does not define these terms or include limits on the Minister’s regulation-making authority, the provision could be applied broadly.</li> </ul>	
Potential Autonomy Impact	Potential Cost Impact
 <ul style="list-style-type: none"> <li>Allows for potential “one-size-fits-all” requirement.</li> <li>No legislated limits on scope of automated decision-making, or clarity that municipalities will be empowered to exempt certain development types, development in lands zoned for certain uses, or specific applications from an “automatic yes” regulation.</li> </ul>	 <ul style="list-style-type: none"> <li>Costs of technology, training, and ongoing maintenance of automated system could be prohibitive, especially for smaller municipalities with limited development permit requests.</li> <li>Increased risk of erroneous automated approvals resulting in land use conflict, infrastructure impacts, or safety risks.</li> </ul>
Outstanding Questions	
<ul style="list-style-type: none"> <li>Does the Minister plan to immediately develop a regulation requiring adoption of an automated permitting system?</li> <li>Will degree of voluntary uptake and scope of usage across municipal sector inform the Minister’s decision to develop a regulation?</li> <li>Will “automated system” be defined in a regulation? How prescriptive will requirements be as to system function and scope?</li> <li>How does the GOA define “low risk” permits? Will a regulation define this universally or based on local conditions?</li> <li>If automated systems are mandated, will GOA provide municipalities with implementation funding and capacity-building support?</li> <li>Would mandatory uptake be tailored to different development types (i.e., residential)?</li> <li>Will municipalities assume additional liability resulting from permits issued incorrectly through an automated system?</li> </ul>	
RMA Priorities	
<ul style="list-style-type: none"> <li>Engage with members to understand potential costs and administrative requirements associated with automated systems.</li> <li>Advocate for use of automated systems to continue to be a local decision.</li> <li>If the Minister develops a regulation, advocate for inclusion of standards reflecting varying levels of capacity and volumes of permits.</li> </ul>	



## 2. Regulation-Making Authority Related to Development Applications and Permits, S. 694

Summary	
<ul style="list-style-type: none"> <li>◆ Significantly expands regulation-making authority related to how municipalities receive, review, and approve develop permits.</li> <li>◆ Allows the Minister to issue regulations prescribing processes and timelines for development permit issuance, as well as prescribing or limiting the information that municipalities can request related to development applications.</li> <li>◆ Allows for the development of general regulations related to subdivision of land.</li> </ul>	
Potential Autonomy Impact	Potential Cost Impact
	
<ul style="list-style-type: none"> <li>◆ Allows the Minister to reduce additional information requests related to development permits, or establish an exhaustive and standardized list for all development types.</li> <li>◆ Imposition of extremely short approval timelines could combine with expanded requirement for automated systems to limit or eliminate manual review and verification of permit applications.</li> </ul>	<ul style="list-style-type: none"> <li>◆ Reductions to approval timelines could require municipalities to invest in additional staff capacity or automated systems.</li> <li>◆ Municipalities may incur long-term costs related to infrastructure strain, missed development opportunities, environmental and safety remediation, and increased legal risks or litigation costs arising from flawed or rushed approvals.</li> </ul>
Outstanding Questions	
<ul style="list-style-type: none"> <li>◆ Will the Minister immediately develop a regulation limiting approval timelines or information that municipalities can request?</li> <li>◆ How will the Minister balance industry requests for reduced regulatory requirements with the need for local planning accountability?</li> <li>◆ How will the Minister balance differing local contexts, including nature of development, local capacity, local growth rates, land use risks, etc. when considering whether to develop a regulation, and how a regulation should be scoped?</li> <li>◆ Does the Minister envision creating regulations aimed at individual municipalities, certain types of municipalities, or associated with certain types of development? If so, how will the scope be determined?</li> <li>◆ Does the GOA expect municipalities to assume legal liability for permits approved under provincially-mandated processes?</li> </ul>	
RMA Priorities	
<ul style="list-style-type: none"> <li>◆ Seek clarity from the GOA on if and how existing development approval timeliness is measured and benchmarked currently?</li> <li>◆ Advocate for continuation of status quo approach in which municipalities have appropriate flexibility in legislation to abide by general timelines and seek supplementary information from applicants when required.</li> <li>◆ If Minister pursues regulation development, seek to hold GOA and industry accountable for justifying need for limitations on timelines or scope of information based on specific evidence of unreasonable cost or growth impacts associated with the status quo.</li> </ul>	

### 3. Community Design Codes, S. 640.3



Summary	
<ul style="list-style-type: none"> <li>◆ Authorizes the Minister to establish community design codes that set rules for design of residential and commercial development or redevelopment, including architectural style, districting, frontage standards, landscaping, parks, parking, and street design.</li> <li>◆ Allows municipalities to voluntarily adopt a design code by bylaw, while authorizing the Minister to require, by regulation, one, some or all municipalities to apply a design code.</li> <li>◆ Links imposition of design codes to imposition of alternative development approval timelines.</li> <li>◆ Clarifies that if implemented, design codes take precedence over all other statutory plans and land use bylaws.</li> </ul>	
Potential Autonomy Impact	Potential Cost Impact
	
<ul style="list-style-type: none"> <li>◆ Allows the Minister to mandate appearance/function of infrastructure, regardless of alignment with local priorities.</li> <li>◆ Could reduce developer costs by mandating under-designed public infrastructure such as parks and streets.</li> <li>◆ Could undermine local uniqueness of communities by imposing “cookie cutter” design across province.</li> </ul>	<ul style="list-style-type: none"> <li>◆ Introduces a new layer of regulatory complexity for municipalities related to aligning local plans and standards with provincially-imposed codes.</li> <li>◆ Requirements for extremely high design standards may transfer excessive costs associated with development to broader property tax base.</li> </ul>
Outstanding Questions	
<ul style="list-style-type: none"> <li>◆ Does the Minister intend to develop community design codes immediately? If so, will they be mandated in some or all municipalities?</li> <li>◆ What level of detail will the codes include? High-level, principle-based guidance or prescriptive, mandatory standards?</li> <li>◆ Will municipalities retain an ability to modify design codes to reflect local conditions, servicing realities, or community priorities?</li> <li>◆ How will the GOA address local input or concerns with development prescribed based on community design codes?</li> <li>◆ Does the GOA intend to apply community design codes to rural and/or non-residential development?</li> </ul>	
RMA Priorities	
<ul style="list-style-type: none"> <li>◆ Seek clarity from the Minister on the intent in developing and mandating community design codes.</li> <li>◆ Seek clarity on terms such as “districting,” “frontage standards,” “landscaping,” and others that are not defined in legislation.</li> <li>◆ Understand policy intent and intended outcomes of community design codes, especially related to reducing costs for developers.</li> <li>◆ Advocate for limiting community design codes to enabling tool by emphasizing cost and autonomy risks of province-wide application.</li> </ul>	

#### 4. Off-Site Levy Restrictions, S. 648(2.11)

Summary	
<ul style="list-style-type: none"> <li>Introduces a series of development-related costs that are specifically prohibited from being recovered through off-site levies (OSLs), including operational costs, capital costs related to commercial retail within public facility, moveable capital assets, any costs required to build infrastructure beyond the minimum building code standards.</li> </ul>	
Potential Autonomy Impact	Potential Cost Impact
	
<ul style="list-style-type: none"> <li>It is unknown if and to what extent current OSL regimes seek developer contributions for the now-prohibited costs.</li> <li>RMA is most concerned with prohibition of costs for building beyond minimum design standards. This will discourage proactive planning related to building resilient infrastructure.</li> <li>While initial list of restrictions may have minimal impacts in most municipalities, the creation of s. 648(2.11) creates a precedent for further restriction of OSL scope in the future.</li> </ul>	<ul style="list-style-type: none"> <li>Limiting the extent to which municipalities can apply a “growth pays for growth” approach to funding public infrastructure costs associated with private development will shift costs to the broader tax base in the form of increased property tax rates or reduced service levels.</li> <li>The specific impacts of the existing list included in s. 648(2.11) are unknown.</li> </ul>
Outstanding Questions	
<ul style="list-style-type: none"> <li>What analysis or data supported the list of prohibitions? Are the prohibited items currently included in some OSL regimes?</li> <li>Given these prohibitions, what is the GOA’s view of the concept of “growth pays for growth,” especially given the broader downloading and fiscal challenges facing the municipal sector?</li> <li>How significant does the GOA anticipate municipal revenue losses will be as a result of the new levy exemptions, and has any modelling been completed to assess these impacts across different types of municipalities?</li> </ul>	
RMA Priorities	
<ul style="list-style-type: none"> <li>Advocate for no further prohibitions to OSL scope.</li> <li>As Alberta leads the country in housing starts, request that the GOA and development industry provide evidence that OSLs were a legitimate barrier to new developments.</li> </ul>	

## Public Institutions

### 5. Authority Over Municipal Public Utility Governance, S. 44.1



Summary	
<ul style="list-style-type: none"> <li>◆ Cabinet can now require a municipality to transfer ownership or control of a public utility to a designated public utility entity.</li> <li>◆ Terms such as “public utility entity,” as well as how such entities would be governed, operated and managed, are all subject to regulation-making authority and not defined in the MGA.</li> <li>◆ Regulations made under this section of the MGA would prevail over any other section of the MGA.</li> </ul>	
Potential Autonomy Impact	Potential Cost Impact
 <ul style="list-style-type: none"> <li>◆ The change affords Cabinet wide latitude to modify governance and delivery of local services, completely eliminate municipal control or involvement in a service, or transfer ownership entirely.</li> <li>◆ The intent of this change has not been articulated by the GOA, including concepts such as a “public utility entity,” the situations that would warrant use of the power, and the characteristics or composition of a public utility entity formed as a result of the power.</li> <li>◆ Based on the existing MGA definition of “public utility” (s. 1(1)(y)) this power applies broadly and includes services such as water, public transit, irrigation, and waste management.</li> <li>◆ S. 44.1 allows Cabinet to make regulations that would prevail over the remainder of the MGA. This would include designating additional services as “public utilities” beyond what is defined in the Act. This could allow for forced removal of local control over delivery of any municipal service.</li> </ul>	 <ul style="list-style-type: none"> <li>◆ This power has the potential to shift ownership, delivery, oversight, or governance of a broad range of services from the municipal level to a “public utility entity.” Many of the services that could be impacted by s. 44.1 are those that generate revenue for municipalities through user fees.</li> <li>◆ This power introduces significant cost and service risks to local property owners. It is important to be aware that s. 44.1 has been introduced while the GOA is undertaking research on “alternative financing tools” for municipalities, such as asset recycling, P3s, and others that reduce municipal control and increase private sector involvement in operating and deriving revenue from municipal services and infrastructure. While these tools may be effective in some cases, it is concerning that s. 44.1 will give the GOA authority to force transfer of ownership or control over public services to entities that could include the private sector if such an arrangement is opposed locally.</li> </ul>
Outstanding Questions	
<ul style="list-style-type: none"> <li>◆ What criteria, principles, or evidence will guide Cabinet as to whether a public utility should be transferred to a public utility entity?</li> </ul>	

- ◆ How will the GOA ensure that use of this authority respects municipal autonomy, local service level requirements, and the operational realities of local utility management?
- ◆ Will municipalities be consulted before Cabinet compels a transfer, and what opportunities will exist for alternative solutions?
- ◆ Will the province define or limit the types of “public utility entities” that may be prescribed by regulation, particularly given the broad ability to designate “any other entity”?
- ◆ Will private sector organizations be included as potential “public utility entities” for the purposes of s. 44.1?
- ◆ How will the province assess and mitigate potential impacts on utility rates, service levels, and long-term infrastructure planning if ownership or control is transferred away from municipalities?
- ◆ How does the GOA justify authority to transfer ownership or control of municipal utilities, which have been built, maintained, and paid for by local ratepayers, without local consent.
- ◆ What principles will ensure that taxpayer-funded infrastructure is not transferred against the interests of the community?
- ◆ How does the GOA justify allowing regulations made under s. 44.1 to prevail over the remainder of the MGA?

#### **RMA Priorities**



- ◆ Seek commitment from GOA for collaborative development of clear thresholds, criteria and processes by which s. 44.1 will be used, including clear principles for gathering local input and consent prior to using s. 44.1 powers.
- ◆ Advocate for proactive development of regulations clearly scoping concepts such as “public utility entity,” as well as an assurance that s. 44.1 will not be used for any municipal services not listed in MGA s. 1(1)(y).

## 6. Expanded Ministerial Oversight of Public Libraries, S. 39, 40, and 40.1 (*Libraries Act*)

Summary	
<ul style="list-style-type: none"> <li>◆ The Minister’s inspection powers related to public libraries are expanded to include any matter related to management, administration, or operation of a public library, including library property, services, and staff information.</li> <li>◆ The Minister may now issue any order considered appropriate following an inspection.</li> <li>◆ The Minister may make regulations limiting public access to specific library materials, including based on age.</li> </ul>	
Potential Autonomy Impact	Potential Cost Impact
 <ul style="list-style-type: none"> <li>◆ Significant expansion of the Minister’s power to inspect nearly all aspects of library functionality risks undermining local governance and operations of library services.</li> <li>◆ Province-wide restrictions on access to certain materials may not align with local preferences, and may place library staff and boards in conflict with library users.</li> </ul>	 <ul style="list-style-type: none"> <li>◆ Library boards may incur costs related to new technology or additional capacity to monitor access to materials restricted at the provincial level.</li> <li>◆ Frequent or wide-ranging inspections, as well as orders directing changes in governance or operations, may introduce added administrative and adaptation costs for library boards.</li> </ul>
Outstanding Questions	
<ul style="list-style-type: none"> <li>◆ Does the GOA plan to establish criteria, thresholds, or defined circumstances of what would trigger an inspection of different aspects of a library’s operations?</li> <li>◆ What principles or criteria will guide the Minister’s decisions when issuing orders or directives following an inspection?</li> <li>◆ Will the province provide capacity supports or funding if new regulations or inspection outcomes require operational, administrative, or infrastructure changes for libraries?</li> <li>◆ How will the province address privacy, equity, and operational concerns if age-based or other access restrictions require libraries to verify age or other personal information, and is it reasonable to expect library staff to act as gatekeepers in this way?</li> <li>◆ Will library boards or staff incur any liability risk related to inadvertent misalignment with age-based or other access restrictions?</li> </ul>	
RMA Priorities	
<ul style="list-style-type: none"> <li>◆ Ensure changes to both inspection powers and access requirements are properly scoped in terms of policy intent, implementation process, and mitigation of cost and liability risks for library boards and staff.</li> </ul>	



## Aggregate Pits

### 7. Primacy of Provincial Approvals for Aggregate Pits, S. 619.1

Summary	
<ul style="list-style-type: none"> <li>◆ Provincial approval of pits under the <i>Environmental Protection and Enhancement Act</i> take primacy over municipal plans, bylaws, etc.</li> <li>◆ Require municipalities to amend plans, bylaws, permits, approvals, or any other document to align with a provincial pit approval.</li> <li>◆ Municipalities may continue to regulate or place conditions on issues not addressed in the provincial approval.</li> <li>◆ To RMA's knowledge, the GOA will not amend the provincial approval process to include municipal plans and landowner perspectives.</li> </ul>	
Potential Autonomy Impact	Potential Cost Impact
 <ul style="list-style-type: none"> <li>◆ Municipalities will no longer regulate aggregate-related issues addressed in the provincial approval process, despite such issues having local impacts not addressed at the provincial approval level.</li> <li>◆ Changes result in a lack of requirements for if and how municipal plans and landowner input will be addressed in the provincial approval process.</li> <li>◆ When provincially-approved pits create land use and nuisance conflicts or impact municipal infrastructure, it is likely that residents will view municipalities as accountable.</li> </ul>	 <ul style="list-style-type: none"> <li>◆ Pits approved provincially may have significant infrastructure or land use impacts that could lead to increased municipal costs.</li> <li>◆ Pits approved near other existing or planned development could sterilize or devalue land and ultimately eliminate or reduce long-term opportunities for economic development and assessment base growth.</li> </ul>
Outstanding Questions	
<ul style="list-style-type: none"> <li>◆ Will the Minister of Environment and Protected Areas commit to meaningful engagement with municipal stakeholders on how to ensure municipal plans and perspectives and landowner input are properly weighed in the provincial approval process?</li> <li>◆ Given that pit registrations override municipal statutory plans, land-use bylaws, subdivision decisions, and development permits, how will the province ensure that local planning objectives, infrastructure constraints, and cumulative impacts are not disregarded?</li> <li>◆ How do Bill 28 changes align with ongoing changes related to the Code of Practice for Pits and the Sand and Gravel Task Force?</li> </ul>	
RMA Priorities	
<ul style="list-style-type: none"> <li>◆ Educate GOA on local risks and impacts of gravel pit development, and importance of maintaining a local lens on approvals.</li> <li>◆ Advocate for GOA to undertake meaningful, fulsome, and municipally-focused engagement on implementation of Bill 28 changes, Code of Practice, and Sand and Gravel Task Force recommendations.</li> <li>◆ Explore alternate options by which municipalities can regulate aggregate pit development in context of Bill 28 changes.</li> </ul>	

## Seniors Lodges



### 8. Requisition Scope and Reserve Requirement Changes, S. 1, 7, 7.1, 34 (*Alberta Housing Act*)

Summary	
<ul style="list-style-type: none"> <li>Expands the scope of municipal requisitions for housing management bodies (HMBs) by introducing a capital maintenance reserve.</li> <li>The Minister is now empowered to determine the annual capital maintenance reserve amount required for each individual HMB, which forms the basis as to the amount that impacted municipalities are requisitioned.</li> <li>The Minister may now determine how requisition costs are divided among municipalities that contribute to a given HMB, and require additional municipalities contribute to a given HMB's requisition.</li> </ul>	
Potential Autonomy Impact	Potential Cost Impact
 <ul style="list-style-type: none"> <li>Downloads additional public housing costs onto municipalities without proportional changes in municipal input into HMB management and decision-making.</li> <li>Centralizes decision-making on capital maintenance reserve investment at the provincial level, reducing local control over public housing service levels and management.</li> <li>The changes may force municipalities to financially contribute to HMBs that provide little or no service to their residents and for which they have little or no governance input.</li> </ul>	 <ul style="list-style-type: none"> <li>The combined impact of expanding the scope of municipal requisitions, centralizing how requisition amounts and proportional municipal contributions are determined could have significant local fiscal impacts.</li> <li>Requiring municipalities to contribute to capital maintenance reserves when they have little to no say in determining reserve levels or how reserve funds are used is a significant download. It is crucial that municipal input into reserve use is proportional to the increased fiscal requirements that municipalities will incur.</li> </ul>
Outstanding Questions	
<ul style="list-style-type: none"> <li>What is the province's policy justification for downloading housing costs onto municipalities through increased requisition scope?</li> <li>What methodology will determine capital maintenance reserve levels for HMBs?</li> <li>Will HMBs be required to provide evidence-supported information on asset condition to government to inform determination of reserve levels? If so, how will this information be verified and how will incomplete or inaccurate information be addressed?</li> </ul>	
RMA Priorities	
<ul style="list-style-type: none"> <li>Advocate for fulsome provincial engagement on methodology for setting capital maintenance reserve levels, criteria to warrant minister modification of municipal requisition contributions levels, and other <i>Housing Act</i> changes with municipal fiscal impacts.</li> <li>Collaborate with members to understand long-term fiscal impacts of changes.</li> </ul>	

## Assessment and Property Tax



**NOTE:** Bill 28 changes related to the regulated assessment model are being contemplated as part of the ongoing assessment model review, and are not included in this document.

### 9. Property Tax Sub-Class Prohibition, S. 297 & 297.1


Summary	
<ul style="list-style-type: none"> <li>Prohibits the ability of municipalities to create a separate property tax sub-class for vacant residential properties owned by Alberta residents, defined as individuals who resided in Alberta for at least 183 days in the previous year.</li> </ul>	
Potential Autonomy Impact	Potential Cost Impact
 <ul style="list-style-type: none"> <li>While the specific issue of vacant properties and limited housing supply tends to affect a particular subset of municipalities, the change further reduces municipal autonomy related to taxation and creates a concerning precedent for further provincial control of local tax rates based on industry lobbying.</li> </ul>	 <ul style="list-style-type: none"> <li>The specific cost impacts in the municipalities directly impacted by the change is unknown.</li> <li>In general, restricting municipal tax rate flexibility limits the effectiveness of tax rates as a policy tool to incentivize development or ensure that various property types are contributing their “fair share” based on the local context.</li> </ul>
Outstanding Questions	
<ul style="list-style-type: none"> <li>How did government balance property owner/development industry lobbying with the perspective of municipalities using tax rates as a policy tool to address housing undersupply when implementing this restriction?</li> <li>What is the policy intent of basing the restriction on the residence of the property owner rather than the status of the property itself?</li> <li>Does this change indicate a broader willingness on the part of the GOA to further limit or restrict local autonomy over tax rates in response to industry lobbying?</li> </ul>	
RMA Priorities	
<ul style="list-style-type: none"> <li>Seek clarity from GOA on whether they view this change as a “one-off” to address a unique situation, or as a pre-cursor to broader shifts to local autonomy in setting tax rates.</li> </ul>	

## Governance and Accountability

### 10. Ministerial Authority Over Municipal Dissolution Decisions, S. 130.1



Summary	
<ul style="list-style-type: none"> <li>Allows the Minister to override a public vote on dissolution following a viability review by recommending to Cabinet that a municipality dissolve, or that it remain a municipality while meeting viability directives, regardless of the public vote results.</li> </ul>	
Potential Autonomy Impact	Potential Cost Impact
 <ul style="list-style-type: none"> <li>Depending on how the Minister uses this new override power, local direction on the future of a municipality subject to a viability review could be eliminated.</li> <li>Absorbing municipality has no input into decision despite direct impacts. If Minister uses this power to override a vote result that significantly impacts absorbing municipality, this power could support autonomy for absorbing municipality.</li> <li>Broader changes to the viability review process are required to properly weigh impacts on the absorbing municipality. If the process is improved, this power should not be required.</li> </ul>	 <ul style="list-style-type: none"> <li>Depending on how override power is used, Minister could transfer significant costs to absorbing rural municipalities such as infrastructure deficits, urban servicing expectations, and others.</li> <li>If the Minister uses this power to prevent resident-supported resolutions that will place unreasonable fiscal pressures on the absorbing municipality, this change could serve as a source of fiscal protection for rural municipalities.</li> <li>Changes to the viability review process are needed to gather and weigh fiscal impacts of dissolution on absorbing municipality. If the process is improved, this power should not be required.</li> </ul>
Outstanding Questions	
<ul style="list-style-type: none"> <li>Does the GOA plan to develop guidelines or criteria as to when this power will be used? If so, will they engage with stakeholders?</li> <li>How will the GOA ensure that this power is used transparently and that the GOA maintains accountability to local residents?</li> </ul>	
RMA Priorities	
<ul style="list-style-type: none"> <li>Emphasize that this power should only act as a short-term back-stop for the current viability review process, which requires change.</li> <li>Recommend to the GOA clear criteria and situations for which the Minister may exercise this power, in relation to three scenarios:             <ul style="list-style-type: none"> <li>An inadequate or incomplete viability review process resulting in un- or mis-informed residents.</li> <li>Repeated viability reviews, with resident votes to remain a municipality, during which local fiscal conditions continue to worsen.</li> <li>Unreasonable or extreme impacts or risks posed to the absorbing municipality as a result of the resident vote outcome.</li> </ul> </li> <li>Continue to advocate for improvements to the viability monitoring and review process to better understand and weigh impacts on potential absorbing municipalities and ensure that resident votes are based on accurate, relevant, and understandable information.</li> </ul>	

## 11. Councillor Accountability Framework, S. 146.01-09

Summary	
<ul style="list-style-type: none"> <li>◆ Bill 28 introduces a new MGA section establishing the broad parameters of a “councillor accountability framework,” with many of the details related to how the framework would be applied deferred to regulation-making authority.</li> <li>◆ Details of the framework that will be addressed through regulation include rules of conduct that may warrant a complaint, complaint submission processes, investigative processes, sanctioning processes, appeal processes, and others.</li> <li>◆ The Minister has broad authority to develop the overall process and shape individual complaint processes, including through defining the scope of complaints, qualifications and powers of investigators, and many other areas.</li> </ul>	
Potential Autonomy Impact	Potential Cost Impact
	
<ul style="list-style-type: none"> <li>◆ Potential for the Minister to direct complaints risks politicization of the framework, undermining its intent.</li> <li>◆ Minister discretion to accept, reject, or adjust recommendations from an appeal commissioner risks weakening independence of the process.</li> </ul>	<ul style="list-style-type: none"> <li>◆ The requirement that all complaints be referred to a third-party investigator could result in significant cost implications for municipalities and be subject to process abuses in the form of repeated filing of vexatious complaints.</li> <li>◆ Costs for investigation, appeals, and records retention, will depend on future regulations, leaving municipalities with significant uncertainty about financial implications.</li> </ul>
Outstanding Questions	
<ul style="list-style-type: none"> <li>◆ What will the engagement process look like, and how will municipal input be incorporated into the final model and regulation?</li> <li>◆ How will the GOA ensure that the framework is practical, proportionate, and workable for municipalities of all sizes and capacities?</li> <li>◆ Will municipalities retain ability to supplement the framework with local expectations or values, or will provincial rules be exhaustive?</li> <li>◆ How will municipal costs associated with third-party investigations, appeals, and process requirements be determined, and will funding support be made available to municipalities incurring significant or disproportionate costs?</li> </ul>	
RMA Priorities	
<ul style="list-style-type: none"> <li>◆ Submit to government policy positions to ensure the framework supports accountability, local autonomy, and efficient processes.</li> <li>◆ Clarify government policy intent related to framework based on 2025 decision to repeal initial codes of conduct completely.</li> <li>◆ Better understand role of Minister in complaint, investigation, and appeal processes.</li> <li>◆ Undertake ongoing monitoring and evaluation of framework in effectively addressing local conduct issues.</li> </ul>	

## Municipal Transparency

### 12. Public Disclosure of Employee Compensation, S. 215.1-7

Summary	
<ul style="list-style-type: none"> <li>◆ Municipalities will now be required to annually publish on their website compensation information for employees earning an amount in excess of the threshold defined in the <i>Public Sector Compensation Transparency Act</i>.</li> <li>◆ The new requirements also establish Ministerial authority to order audits of municipal employee compensation, creating a provincial oversight mechanism with associated municipal compliance obligations.</li> </ul>	
Potential Autonomy Impact	Potential Cost Impact
 <ul style="list-style-type: none"> <li>◆ Transferring existing provincial “sunshine list” requirements to the municipal sector ignores differences in local context in areas such as municipal type, capacity, level of expertise, etc.</li> <li>◆ Some employees may face privacy risks and unwarranted scrutiny from local residents, or increased tension and animosity within the workplace as a result of their salary being disclosed. Both could result in added retention challenges for municipalities.</li> </ul>	 <ul style="list-style-type: none"> <li>◆ Salary disclosure could result in increased salary expectations for municipal employees based on what individuals employed in similar roles in other municipalities earn. While this may help to counteract other retention risks associated with public salary disclosures, it may place municipalities with limited capacity in a difficult position requiring significant salary increases or a loss of key employees to other sectors.</li> <li>◆ Minister-ordered audits make municipalities responsible for all related audit costs, creating a potentially significant and unpredictable financial burden.</li> </ul>
Outstanding Questions	
<ul style="list-style-type: none"> <li>◆ How will the province respond if this change creates retention challenges across the municipal sector?</li> <li>◆ How will the Minister’s audit powers be exercised in practice, and what criteria or triggers will determine when an audit is initiated?</li> <li>◆ On what basis will disclosure exemptions be determined? Will this power rest with the Minister or be determined locally?</li> </ul>	
RMA Priorities	
<ul style="list-style-type: none"> <li>◆ Work with the Alberta Rural Municipal Administrators Association and other stakeholders to consider development of best practices or other guidance related to how municipalities can provide context to residents in relation to various positions and associated responsibilities to support better understanding of the value provided by various municipal positions likely to be included on most local sunshine lists.</li> </ul>	