

May 26, 2026 Open Council Meeting

Resolution: Revise AAP Policy - Electronic Submission of Elector Response Forms

WHEREAS:

1. At its April 14, 2026, Council meeting, Council directed City staff to proceed with an Alternative Approval Process (“AAP”) for the following loan authorization bylaws:
 - (a) *965 McMaster Way Loan Authorization Bylaw No. 57-4, 2025*; and
 - (b) *Tranquille Phase III Loan Authorization Bylaw No. 57-5, 2025*.(the “Loan Authorization Bylaws”).
2. At its April 14, 2026, Council meeting, Council:
 - (a) set the elector response deadline date for the AAPs for the Loan Authorization Bylaws as May 29, 2026;
 - (b) approved the number of eligible electors as 85,273 and the 10% threshold as 8,527 responses; and
 - (c) approved four elector response forms, shown as attachments “D”, “E”, “F”, and “G” in the Alternative Approval Processes Report dated April 14, 2026 (the “Elector Response Forms”).
3. *Council Policy GGL-33: Alternative Approval Process (AAP)* (the “AAP Policy”) provides that Elector Response Forms will only be accepted through the following methods:
 - (a) delivered in person at City Hall (either during business hours or in the 24-hour secure drop box);
 - (b) by mail to City Hall; or
 - (c) by emailing a legible copy to KamloopsAAP@kamloops.ca.
4. In accordance with the AAP Policy, the Elector Response Forms approved by Council on April 14, 2026, advised residents that they could submit their forms electronically to KamloopsAAP@kamloops.ca.

5. On April 20, 2026, in accordance with *Public Notice Bylaw No. 65, 2025*, the City published statutory public notices of the AAPs for the Loan Authorization Bylaws (the “Statutory Public Notices”).
6. The Statutory Public Notices advised residents that they could submit their Elector Response Forms electronically to KamloopsAAP@kamloops.ca.
7. The AAPs for the Loan Authorization Bylaws are currently underway.
8. Since April 20, 2026, the City has received several submissions of Elector Response Forms to the legislate@kamloops.ca email address.
9. In response to these submissions, City staff have been responding to the sender and advising them to re-send their Elector Response Forms to the KamloopsAAP@kamloops.ca email address. However, there may be individuals who do not re-send their Elector Response Form to the KamloopsAAP@kamloops.ca email address.
10. The City has since learned that some of the embedded links in the Elector Response forms and Statutory Public Notices may have linked to the legislate@kamloops.ca email address.
11. The current wording of the AAP Policy prohibits the City from accepting Elector Response Forms emailed to the legislate@kamloops.ca email address.
12. To ensure transparency and the fairness of the AAP process, City staff recommend that Council authorize them to count Elector Response Forms for the AAPs submitted to either the legislate@kamloops.ca or KamloopsAAP@kamloops.ca email addresses.
13. Having considered the matter, Council has concluded that this was a minor technical error that does not impact the express content of the Elector Response Forms or the Statutory Public Notices. Provided that all eligible Elector Response Forms are properly counted, the technical error does not materially affect the fairness or transparency of the AAP processes.

COUNCIL DIRECTS THAT:

- (a) *Council Policy GGL-33: Alternative Approval Process (AAP)* is amended as set out in Schedule “A” attached to this resolution to direct staff to accept Elector Response Forms submitted to either the legislate@kamloops.ca email address or the KamloopsAAP@kamloops.ca email address;
- (b) The amendment set out in paragraph (a) of this resolution will apply retroactively to the date the AAPs for the Loan Authorization Bylaws commenced, being April 20, 2026;
- (c) For clarity, and pursuant to paragraphs (a) and (b) of this resolution:

- (i) City staff are directed to count all Elector Response Forms submitted to either legislate@kamloops.ca or KamloopsAAP@kamloops.ca for the current AAPs relating to *965 McMaster Way Loan Authorization Bylaw No. 57-4, 2025* and *Tranquille Phase III Loan Authorization Bylaw No. 57-5, 2025*;
 - (ii) City staff must ensure that any Elector Response Forms submitted to both email addresses are identified as duplicates and counted only once; and
- (d) In accordance with section 86(3)(b) of the *Community Charter*, Council reaffirms its April 14, 2026, approval of the Elector Response Forms with the corrected imbedded links.



City of Kamloops

COUNCIL POLICY

SUBJECT: ALTERNATIVE APPROVAL PROCESS (AAP)	NO. GGL-33
FUNCTION: GENERAL GOVERNMENT - LEGISLATIVE	
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PURPOSE:

To establish processes related to an Alternative Approval Process (AAP) that are not specifically directed by legislation. This includes:

- Establishing a process for determining the number of eligible electors for an AAP;
- Establishing a process for accepting Elector Response Forms from the public during an AAP;
- Establishing a process by which individuals can withdraw a submitted Elector Response Form.

INTRODUCTION:

Section 86(3) of the *Community Charter* provides that when conducting an AAP, the council must make a fair determination of the total number of electors of the area to which the AAP applies. However, the *Community Charter* is silent with respect to the process that should be followed by a local government to estimate the total number of eligible electors for council’s consideration.

The *Community Charter* is also silent with respect to the issue of how Elector Response Forms may be submitted by eligible electors and received by a local government body. The Ministry of Housing and Municipal Affairs recommends in its guidelines *Alternative Approval Process: A Guide for Local Governments in British Columbia* that if, in addition to accepting Elector Response Forms in person or by mail, a local government decides to accept Elector Response Forms by electronic means, the local government should ensure that it has an appropriate policy in place.

The *Community Charter* states that every eligible elector is entitled to submit one (1) Elector Response Form in response to an AAP. Moreover, the Ministry’s guidelines state that signed Elector Response Forms can be received from other eligible electors and submitted to the Corporate Officer for those electors who are unable to submit them in person.

1. Estimating the Number of Eligible Electors for Council’s Approval

- a) For every AAP, staff will prepare an estimate of the total number of electors eligible to vote in the AAP to be put before Council for consideration.
- b) The estimate of the number of electors eligible to vote in an AAP will be determined by the Corporate Officer, or their designate, by using population estimates and projections from BC Stats to determine the total number of Kamloops residents aged 18 and older, adjusted with:



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- i) Federal census data to determine the number of non-Canadian citizens and the number of residents not residing in British Columbia in the last six months; and
- ii) data from the City's taxation division to determine the number of non--resident property electors.
- c) The estimate of eligible electors as determined by the Corporate Officer, or their designate, as set out above, will then be put before Council for approval in accordance with section 86(3) of the *Community Charter*.

2. Availability of Elector Response Forms

- a) Elector Response Forms will be:
 - i) printed and available for pickup at City Hall, 7 Victoria Street W., Monday to Friday, 8:00 am to 4:00 pm, excluding statutory holidays; and
 - ii) posted online at kamloops.ca for the public to print on the same day of the first official notice and throughout the AAP.

3. Submission of Elector Response Forms

- a) Elector Response Forms will only be accepted until the deadline set out in the Notice of AAP through the following methods:
 - i) Delivered in person at City Hall, 7 Victoria Street W., Attention: Corporate Officer, during regular business hours (Monday to Friday, 8:00 am to 4:00 pm, excluding statutory holidays), or after hours if deposited into the 24-hour secure drop box at the entrance of City Hall.
 - ii) By mail to City of Kamloops, 7 Victoria Street W., Kamloops BC, V2C 1A2, Attention: Corporate Officer, with the Elector Response Form received by the deadline set out in the AAP Notice.
 - iii) By emailing a legible copy to: KamloopsAAP@kamloops.ca or legislate@kamloops.ca, with the email received by the deadline set out in the AAP Notice.
- b) Elector Response Form must include the signature of the elector, and electronic signatures are acceptable.



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- c) City staff will not contact electors whose submitted Elector Response Forms have been completed incorrectly or only partially completed.
- d) City staff will not confirm receipt of Elector Response Forms submitted in hardcopy by initialling, signing, stamping, photocopying, etc.
- e) City staff will not review Elector Response Forms upon submission for eligibility, completeness, or accuracy.

4. Processing of Elector Response Forms

- a) Following expiry of the deadline set out in the AAP Notice, the Corporate Officer or their designate(s) will count the total number of Elector Response Forms received by the deadline.
 - i) If the total number of Elector Response Forms received by City by the deadline set out in the AAP Notice is less than the number of Elector Response Forms required to meet the 10% threshold for approval, the Corporate Officer may certify that elector approval has been obtained in accordance with section 86 of the *Community Charter*, without reviewing each individual Elector Response Form for eligibility and completeness.
 - ii) If the total number of Elector Response Forms received by the City by the deadline set out in the AAP Notice is more than the number of Elector Response forms required to meet the 10% threshold for approval, the Corporate Officer, or their designate, will review all submitted Elector Response Forms for eligibility and compliance.
- b) During review by the Corporate Officer, or their designate(s), in accordance with 4(a)(ii) above, Elector Response Forms may be rejected as being ineligible or non-compliant for a variety of reasons, including if:
 - i) the Elector Response Form was not completed in its entirety;
 - ii) the Elector Response Form was submitted with a PO box as the address;
 - iii) the Elector Response Form is illegible;
 - iv) the Elector Response Form was completed by a person who is not an elector eligible to vote in the AAP;



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- v) the Elector Response Form belongs to an elector who signed more than one Elector Response Form;
 - vi) more than one non-resident property elector signed a form in relation to the same property; or
 - vii) a non-resident property elector signed a form in relation to a property owned in whole or in part by a corporation.
- c) Once the preliminary review has been completed in accordance with 4(a)(ii) and (b), the Corporate Officer, or their designate, will count the remaining compliant and eligible Elector Response Forms.
- i) If the number of remaining compliant and eligible Elector Response Forms received by City by the deadline set out in the AAP Notice is less than the number of Elector Response Forms required to meet the 10% threshold for approval, the Corporate Officer will certify that that elector approval has been obtained in accordance with section 86 of the *Community Charter*.
 - ii) If the number of remaining compliant and eligible Elector Response Forms received by the City by the deadline set out in the AAP Notice is more than the number of Elector Response Forms required to meet the 10% threshold for approval, the Corporate Officer will certify that elector approval has not been obtained in accordance with section 86 of the *Community Charter*.
- d) Personal information on completed Elector Response Forms will be collected, used, stored, and disclosed in accordance with the British Columbia *Freedom of Information and Protection of Privacy Act* and other applicable legislation, as revised and replaced from time to time.

5. Withdrawing an Elector Response Form

- a) Prior to the deadline set out in the AAP Notice, an elector may withdraw their Elector Response Form by making a request to the Corporate Officer, in writing. Upon receipt of such a request, the Corporate Officer may require the requestor provide proof of identification.



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6. Storage and Destruction of Elector Response Forms

- a) All Elector Response Forms submitted to the City will be stored in a secure, fireproof location that is only accessible by the Corporate Officer or their designate for the duration of the AAP.
- b) All Elector Response Forms submitted to the City will be retained until the expiry of the deadline for legal challenge or appeal of the AAP at which point they will be destroyed in consultation with legal counsel.

Amended:

Reviewed:

