

AFTER ACTION REVIEW

MUNICIPAL NAMING POLICY

NAME REMOVAL / RENAMING PROCESS

CONTEXT

In July 2024, a proposal to remove the name Grandin from all municipal assets was submitted. The submission of the proposal triggered the *Name Removal Criteria* and *Name Removal/ Renaming Process*, as defined by the *Municipal Naming Policy C-CC-05* and the *Municipal Naming Administrative Directive A-P&E-03*, to be enacted for the first time.

This After-Action Review focuses on the process that was followed by Administration to accept, substantiate, and make a recommendation related to the application in alignment with the relevant policy and administrative directive. It is not intended to focus on the specifics of the application that initiated the process, nor Council's decision to remove the name Grandin from all municipal assets.

OBJECTIVE

The objectives of the After-Action Review are to:

- Explore the intent of the Municipal Naming Policy against the perceived process outcomes;
- Identify notable findings associated with the name removal and renaming process;
- Facilitate a conversation to understand Council's perspectives on what aspects of the process worked well, what could be improved, and how the City of St. Albert may approach similar efforts in the future; and
- Provide an overview of the direction provided by the *Name Removal Criteria* and *Name Removal/ Renaming Process* compared to the actual steps taken and associated outcomes.

POLICY INTENT AND PROCESS OUTCOMES

According to the Policy Statement of the *Municipal Naming Policy* (C-CC-05), the policy is intended to ensure that:

Names of Municipal Assets in the City of St. Albert shall reflect the City's diverse history, culture, languages and values. The naming or renaming of a Municipal Asset should be an equitable, inclusive, transparent, and comprehensive process, and should reflect the City's goal of establishing a welcoming, diverse, and inclusive community as expressed in the *Diversity and Inclusion Declaration*. This Policy is intended to allow residents and persons having a substantial connection with the City an opportunity to suggest names of Municipal Assets that reflect their histories, cultures, languages, and values. To that end this Policy establishes a framework for naming and renaming of Municipal Assets that reflects modern day values while allowing the capacity to adapt to continually evolving values in the City of St. Albert.

Members of Administration involved in the first instance of the name removal and renaming process believe that the process successfully upheld the policy's intended principles. The process led to a recommendation for the removal of a municipal asset name, which was shown to meet the eligibility criteria outlined in the *Name Removal Criteria*.

NOTABLE FINDINGS

This section presents key insights from individuals directly involved in the name removal and renaming process. It highlights outcomes that these individuals perceive to be true, aiming to foster meaningful dialogue with Council on both shared and differing perspectives regarding the process's key takeaways. The insights are organized into five key themes, each accompanied by associated findings.

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1. PROCESS CONFIDENCE

Overall, the name removal and renaming process, as outlined in the *Municipal Naming Policy* (C-CC-05) and the *Administrative Directive* (A-P&E-03), is considered clear while allowing for necessary interpretation to ensure its application across a variety of situations. Similarly, the *Name Removal Criteria* was perceived as straightforward and effective in validating applications. Additionally, *Name Removal Criteria* is seen to be well aligned with the City of St. Albert's values and facilitates meaningful action towards Reconciliation.

However, despite the process clarity and the prior policy consultation, along with Council's approval of the Municipal Naming Policy, the first name removal application highlighted the sensitivity and controversy surrounding the process. The contentious nature of the application is believed to have eroded confidence in the name removal and renaming process, as is evident by concerns raised by one or more Council members and some members of the community regarding:

- The number of signatures or letters of support required for an application to be reviewed;
- Suggestions that name removal applications should be handled similarly to a plebiscite;
- Uncertainties surrounding the definition of a "substantial connection" to St. Albert; and
- Interpretation of public engagement within the process (see more details in *Notable Findings Section 2. Public Consultation*).

To address future concerns and strengthen confidence in the process, further conversation and alignment is required between Council and Administration on the criteria to initiate a name removal application and review process.

2. PUBLIC CONSULTATION

The review of the first name removal application highlighted both the effectiveness and challenges of consultation and engagement efforts. Consultation with Indigenous Partners was seen as highly impactful, ensuring that the perspectives of Equity-Deserving Groups informed the final recommendation. Despite tight timelines for the application review process, there was general support for the name removal from affected Equity-Deserving Groups.

However, concerns emerged regarding the interpretation of the terms "notified" and "consulted" within the *Municipal Naming Policy*, especially in relation to broader public engagement efforts. Administration interpreted consultation and notification activities as a means of informing affected community members about the potential municipal asset name change, consulting them on its potential impacts, and notifying them of the decision-making process – including the opportunity to provide input to Council through public presentations at a Council meeting - rather than soliciting public validation of the decision.

This interpretation aligns with the policy's perceived intent, as the policy does not require the Naming Committee to validate a name removal application through community input before recommending it; rather, it requires that affected groups be notified and consulted once the application has been identified as possibly meeting the Name Removal Criteria. Note, a name qualifies for removal if it refers to a person known for discriminatory views, contains derogatory terms, negatively represents a group or culture, contradicts the City's membership in the *Coalition for Inclusive Municipalities* and the City's *Diversity and Inclusion Declaration*, or brings the City into disrepute. By treating notification and consultation as opportunities for information sharing and impact assessment—rather than a process to validate public sentiment -

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there is deemed to be an equity-based lens applied to the process, allowing decisions to be guided by policy and Council rather than public opinion.

Despite the interpretation of Administration, it is perceived that public consultation did not meet the expectations of some members of the public and one or more Council members. For example, concerns raised during the March 18th Council Meeting suggested that affected community groups were not sufficiently offered the opportunity to provide input. Additionally, some members of the public used the *Grandin Renaming Survey* to express their support or opposition to the name removal and renaming application, despite the survey not being designed for that purpose.

The misalignment of interpretation of consultation and notification activities between Administration, some Members of Council and some members of the public, suggests that clarification of terminology may be required in the future.

3. CONCURRENT NAME REMOVAL AND RENAMING

Section 46 of the *Municipal Naming Policy* indicates that when making a recommendation for name removal, the Naming Committee will make a concurrent recommendation for a new name for the municipal asset in accordance with the *Naming Criteria* or drawing from the *Names Reserve List*. However, challenges arose with this requirement during the review and recommendation of the first name removal application. First, at the time the name removal recommendation was being made, the *Names Reserve List* only contained commemorative names, which conflicted with the *Naming Criteria* which states that "Commemorative Names shall be given to Municipal Assets only on a rare occasion." To avoid recommending a commemorative name to replace the name "Grandin" on municipal assets, the Naming Committee opted to conduct the *Grandin Renaming Survey* to solicit other suitable names.

Secondly, the timing of the survey was deemed to be problematic as some residents may have held the misconception that a decision was already made to remove the municipal asset name of "Grandin", despite the fact that the recommendation had not yet been brought to Council. It is felt that this process may have inadvertently politicized the role of the Naming Committee. The Committee's intended function is to review applications against established criteria, not to engage in public debate or to gauge levels of public support for renaming decisions. By requiring the Naming Committee to make concurrent recommendations on name removal and renaming, it may blur the Committee's purpose, shifting attention away from its policy-driven role.

The challenges that arose related to making concurrent name removal and renaming recommendations may suggest that process separation should be considered.

4. APPLICATION REVIEW EFFORT

The first application for name removal revealed that requiring the applicant to conduct research to provide rationale for the request and demonstrate precedent of identical name removal across Canada was effective in limiting the effort required by the Naming Committee to review and substantiate an application against the Name Removal Criteria. However, it has also been noted that because precedent for this particular name removal has been set, this application was simpler to validate than future applications may be. Additionally, a substantial level of effort was required to notify and consult impacted community groups and Equity-Deserving Groups. And although this level of effort was deemed necessary to have intentional and respectful engagement, while avoiding conflict and harm, there is a risk that future applications could require a differentiated level of effort that may not be reasonable for Administration to execute on.

To mitigate risks associated with high levels of effort to review and validate applications and notify and consult affected community and Equity-Deserving Groups, options for additional resources may be considered in the future, when necessary.

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5. APPLICATION IMPACT

It is notable that this specific name removal application is perceived to have had an impact on the wellbeing of some City employees and external stakeholders. Throughout the name removal and renaming process, careful attention was paid to preventing and mitigating harm. This focus included providing trauma support and counselling to staff members and having security in place during all in-person consultation activities and the March 18th City Council Meeting. These efforts were seen as effective in minimizing adverse outcomes and reinforcing the City of St. Albert’s commitment to the wellbeing and safety of staff, residents, and stakeholders.

POLICY / ADMINISTRATIVE DIRECTIVE PROCESS OUTCOMES

The section below outlines the information in the relevant Policy and Administrative Directive which directed the process related to municipal asset name removal and renaming. It also documents how the policy was interpreted through the actual steps taken to process the application to remove Grandin from all municipal assets, as well as notable outcomes.

| Direction | Steps Taken | Outcome |
|--|---|---|
| Application Initiation | | |
| <p>C-CC-5, Section 41. Any person who</p> <ul style="list-style-type: none">a. resides in or has a substantial connection with St. Albert; andb. demonstrates a substantial level of community support for their proposal in a manner set out in an Administrative Directive issued by the CAO <p>may submit an application to remove a name from or rename an existing Municipal Asset.</p> <p>C-CC-5, Section 42. Applications for naming removal/renaming shall be dealt with through an established and transparent process prescribed by the CAO in an Administrative Directive.</p> <p>A-P&E-03, Section 46. When reviewing name removal or renaming applications, the Naming Committee¹ will be made up of department Directors or their designates.</p> <p>A-P&E-03, Section 47.</p> | <p>The application was accepted for review, based on:</p> <ul style="list-style-type: none">• Confirmation that the applicant met the requirement to submit a proposal; and• Submission of all required documentation, including 50 signatures from individuals who self-identified as having substantial connection to St. Albert, as outlined in the Administrative Directive issued by the CAO. <p>The review of the application was conducted by the Naming Committee, as defined by the Administrative Directive.</p> | <p>Despite meeting the requirements for application intake and review, some concerns were raised during the March 18, 2025, City Council Meeting regarding:</p> <ul style="list-style-type: none">• The threshold of signatures required to initiate application review; and• The definition of “substantial connection,” as defined by the Administrative Directive |

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| <p>Requests from any individual with the intention to remove the name of a Municipal Asset must be made using the Name Removal Request Form and at minimum is to include:</p> <ul style="list-style-type: none">a. Applicant information;b. Confirmation of the Applicant’s Substantial Connection with St. Albert;c. The name and/or address of the Municipal Asset to be removed;d. Rationale for reviewing the property name based on criteria outlined in the Naming Criteria of the Policy;e. Documented support from the community, including but not limited to signatures or support letters from a minimum of 50 people with Substantial Connection;² andf. If applicable, precedent of identical name removals across Canada. <p>¹ Membership of the Naming Committee consists of one representative from each of the following City departments and external organizations:</p> <ul style="list-style-type: none">a. Arts and Heritage Foundation of St. Albertb. Community Servicesc. Emergency Servicesd. Government/Indigenous Relations and Environment (one representative from each of the Indigenous Relations and Environment branches of this department)e. Information Technology | | |

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| <p>f. Planning & Development g. Policing Services h. Recreation & Parks</p> <p>In the case of a name removal request, City departments will be represented by their Directors.</p> <p>² “Substantial Connection” means a significant interconnection or association to the community of St. Albert. Examples include but are not limited to: current or former residents, business owners, or Indigenous people with traditional territory where St. Albert is incorporated.</p> | | |
| Application Substantiation | | |
| <p>C-CC-05, Section 43. The Naming Committee may request additional information from an applicant for name removal and/or renaming, and/or conduct additional research and/or public consultations, to determine the appropriate response to the request.</p> <p>C-CC-05, Section 44. The Naming Committee, working with the Sponsor responsible for the Municipal Asset being reviewed and other Departments as appropriate, will review the request based on merit, compared against the criteria of the Policy</p> <p>A-P&E-03, Section 48. If required, the Naming Committee may request additional information from the applicant and/or conduct additional research and/or public consultations to determine the appropriate response to the request.</p> <p>A-P&E-03, Section 50.</p> | <p>The Arts and Heritage Foundation, a member of the Naming Committee, helped substantiate historical records and documentation provided by the applicant. Additionally, the Truth and Reconciliation Commission Reports were located and reviewed by the Committee.</p> <p>Based on additional evidence to support the rationale provided in the application, the application was reviewed against the Name Removal Criteria, and was determined to meet the criteria.</p> | <p>The Naming Committee found that the application clearly met the conditions for potential name removal, as defined by the Name Removal Criteria.</p> |

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| The Naming Committee, working with the Sponsor responsible for the Municipal Asset being reviewed and other Departments as appropriate, will review the request based on merit, compared against the criteria of the Policy. | | |
| Public Notification and Consultation | | |
| <p>C-CC-05, Section 45. If the Naming Committee determines that an application for name removal may meet the Name Removal Criteria, the Naming Committee will cause affected community groups and Equity-Deserving Groups to be notified and consulted.</p> <p>A-P&E-03, Section 51. If the application for name removal meets the name removal criteria, the Naming Committee will notify and consult affected community groups and Equity-Deserving Groups in accordance with the Public Participation Policy C-CAO-20.</p> | <p>The Government and Indigenous Relations branch led notification and consultation efforts with impacted Indigenous Partners.</p> <p>The Naming Committee worked with Communications and Public Affairs to:</p> <ul style="list-style-type: none"> • Notify residents in the Grandin neighbourhood of the potential name change; • Communicate the potential name change through social media, the City website, and the St. Albert Gazette; • Invite residents to “have your say” through <i>CITYlights</i> articles published on February 6, 2025, and February 13, 2025; • Inform City staff of the potential name change to assist them with answering questions received from the public; • Run the <i>Grandin Renaming Survey</i> to gather input on possible new municipal asset name options; and • Host in-person information sessions for Grandin residents. | <p>Engagement with Indigenous Partners was deemed to be successful, although slightly rushed due to timelines placed on the review of the application.</p> <p>Public notification and consultation activities were deemed successful from the perspective of harm reduction; however, engagement activities did not appear to meet the expectations of some community and Council members.</p> |
| Application Recommendation or Rejection | | |

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| <p>C-CC-05, Section 46. The Naming Committee will make one of the following responses to an application for removal of a name from a Municipal Asset and/or for renaming of the Municipal Asset:</p> <ul style="list-style-type: none"> a. Serve notice of rejection of the application for name removal and/or renaming, giving written reasons for the rejection to the applicant with a copy of the rejection notice provided to the CAO and to all members of Council. b. Recommend to Council that the name of the Municipal Asset be removed, and make a concurrent recommendation for a new name for the Municipal Asset in accordance with the Naming Criteria or drawing from the Names Reserve List. <p>A-P&E-03, Section 52. The Naming Committee will make one of the following responses to an application for removal of a name from a Municipal Asset and/or for renaming of the Municipal Asset:</p> <ul style="list-style-type: none"> a. Serve notice of rejection of the application for name removal and/or renaming, giving written reasons for the rejection to the applicant with a copy of the rejection notice provided to the CAO and to all members of Council. b. Recommend to Council that the name of the | <p>The Naming Committee recommended to Council that the name of the municipal assets be removed, and recommended the name “Garden” as a replacement based on the <i>Grandin Renaming Survey</i>.</p> <p>The replacement name was recommended in accordance with the Naming Criteria, however, it was not drawn from the Name Reserve List, due to the list only containing commemorative names.</p> <p>The Naming Committee prepared a Council report outlining relevant research and their recommendation which was made public as part of the Council Meeting agenda.</p> <p>The Request to Rename Grandin Municipal Assets (AR-25-136) was presented to Council on March 18, 2025. Council discussed the recommendation and voted on the motion publicly - not in-camera, as outlined in the Administrative Directive.</p> | <p>Multiple members of the public and impacted stakeholders opted to speak at the Council meeting to demonstrate their support, or lack there of, for the proposed name change.</p> <p>Concerns regarding the renaming process were highlighted by some external speakers and members of the public during the public presentations and by some members of Council while discussing the request.</p> |

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| <p>Municipal Asset be removed, and make a concurrent recommendation for a new name for the Municipal Asset in accordance with the Naming Criteria or drawing from the Names Reserve List.</p> <p>A-P&E-03, Section 53. The Sponsor prepares a confidential Council report containing research and recommendations proposed by the Naming Committee. The Council report includes a timeline for implementation based on the scope of changes required.</p> <p>A-P&E-03, Section 54. Council meets in-camera to discuss, with final decision made in public.</p> | | |