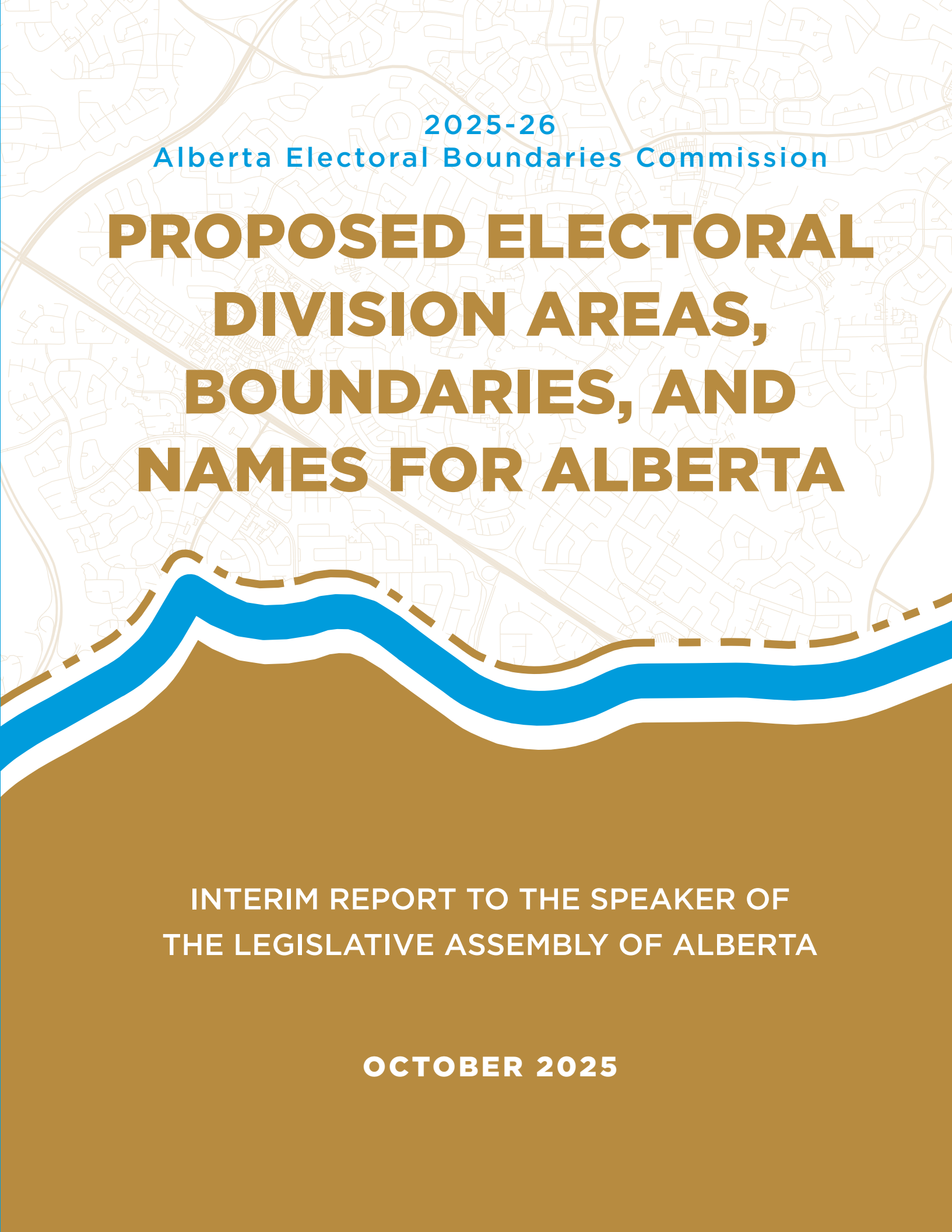




2025-26
Alberta Electoral Boundaries Commission

PROPOSED ELECTORAL DIVISION AREAS, BOUNDARIES, AND NAMES FOR ALBERTA

INTERIM REPORT TO THE SPEAKER OF
THE LEGISLATIVE ASSEMBLY OF ALBERTA

OCTOBER 2025



Suite 100, 11510 Kingsway NW Edmonton, AB T5G 2Y5

The Honourable Ric McIver, ECA
Speaker of the Legislative Assembly of Alberta
Room 325, Legislative Building
10800 – 97 Avenue NW
Edmonton, Alberta T5K 2B6

Dear Mr. Speaker:

We have the honour of submitting to you the unanimous interim report of the 2025-2026 Alberta Electoral Boundaries Commission setting out the areas, boundaries, and names of the 89 electoral divisions proposed for Alberta together with our reasons. This report fulfills our obligation under Section 6(1) of the *Electoral Boundaries Commission Act*, RSA 2000, c. E-3, as amended (the *Act*).

This report is provided within seven months of the establishment of the Commission on March 28, 2025.

We invite responses and further written submissions in the days ahead, and we intend to hold further public hearings as required by the *Act* in January 2026. We will consider the public feedback to this report and provide to you our Final Report on or before March 28, 2026.

Dated at Edmonton, Alberta this 23rd day of October 2025.

Original Signed

Honourable Justice Dallas K. Miller, Chair

Original Signed

Greg Clark, Commissioner

Original Signed

John Evans, KC, Commissioner

Original Signed

Dr. Julian Martin, Commissioner

Original Signed

Susan Samson, Commissioner

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ACKNOWLEDGEMENTS

The Commission acknowledges the advice and suggestions provided at the public hearings and in written submissions from Albertans.

The Commission also wishes to acknowledge the support services provided by:

- Gordon McClure, Chief Electoral Officer, and the staff of Elections Alberta
- Paul Collins, Director, Data Coordination and Geomatics, and GIS Technologists Raymond Mok, Sarah Cirka, and Meghan Pittman of Elections Alberta
- Shannon Dean, KC, Clerk of the Legislative Assembly of Alberta, Aaron Roth, Commission Administrator, Amanda LeBlanc, Managing Editor of *Alberta Hansard*, Senior Editor Janice Connor, and staff from the Legislative Assembly Office
- Gerard Kennedy, PhD, Associate Dean of the University of Alberta Faculty of Law
- Fred Ackah, Chief Statistician of Alberta, and his staff at the Office of Statistics and Information (OSI) at the Alberta Treasury Board

FURTHER CONSULTATION

The Commission is interested in the advice, suggestions, and feedback from Albertans on the 89 electoral divisions proposed in this report. Submissions are most helpful when they:

- Identify by name and number the proposed electoral division described in the submission;
- Briefly describe the specific concerns;
- Propose solutions to address those concerns; and
- Indicate the effect of their proposed solution(s) on neighbouring electoral divisions.

Written submissions must be made before the close of business on Friday, December 19, 2025, and they may be mailed, emailed, or submitted through the Commissions website.

Alberta Electoral Boundaries Commission

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Those wishing to make a submission in person or virtually in January 2026 should check the Commission's website for available dates, times, and locations.

EXECUTIVE SUMMARY

In accordance with its duties under the *Electoral Boundaries Commission Act*, RSA 2000, c. E-3 as amended (“the Act”), the Electoral Boundaries Commission (the “Commission”) recommends that changes be made to the electoral boundaries of most of Alberta’s electoral divisions and that a net of two additional electoral divisions be added.

The Commission’s views can notably be summarized as recommending that:

- one additional electoral division be added north and west of Calgary to reflect the significant increase in population in Cochrane and especially in Airdrie;
- two new additional electoral divisions be added to Calgary, one in the city’s Centre-east and the other in the city’s North, to reflect the significant growth in the city, particularly its North and East;
- an additional new electoral division be added to the southeast of Edmonton;
- an additional new electoral division be added to the west of Edmonton, incorporating Enoch Cree Nation and adjacent area in Parkland County;
- six electoral divisions in the urban centre of Edmonton (Edmonton-City Centre, Edmonton-Glenora, Edmonton-Riverview, Edmonton-Strathcona, Edmonton-Gold Bar, and Edmonton-Highlands-Norwood) be consolidated into five to reflect the fact that the rate of population growth in these areas has been below that of the city, and there is no justifiable reason that these electoral divisions should have populations markedly below the provincial average;
- six electoral divisions in the western and central non-urban areas of the province (Banff-Kananaskis, Rimbey-Rocky Mountain House-Sundre, Maskwacis-Wetaskiwin, Lacombe-Ponoka, Innisfail-Sylvan Lake, and Olds-Didsbury-Three Hills) be consolidated into five, having grown at a rate less than that of the province as a whole;
- seven electoral divisions in the north of the province (Peace River, Central Peace-Notley, Lesser Slave Lake, Grande Prairie-Wapiti, West Yellowhead, Lac Ste. Anne-Parkland, and Athabasca-Barrhead-Westlock) be consolidated into six, having either lost population or grown at a rate that is less than the province as a whole;
- two electoral divisions that are mostly in Calgary incorporate portions of adjacent counties;
- an electoral division that is mostly in Foothills County and the Town of Okotoks (and should mostly be considered a rural electoral division) include some territory in the City of Calgary; and
- various resulting and/or independent constituency boundary changes be made, considering the Commission’s obligations under the Act.

The Commission recommends that the electoral division of Mackenzie, as a successor to the electoral division of Lesser Slave Lake, be granted protection by Section 15(2) of the Act.

The Commission has further considered the following in recommending new or changed names:

- names should reflect the geographical location of the electoral division;
- when a community is divided between multiple electoral divisions, the name of that community should appear first;
- current electoral division names should be retained except where it is recommended that communities whose name in the electoral division be removed from the electoral division;
- names of electoral divisions should be as concise as reasonable; and
- names of electoral divisions that bear multiple communities should list the community with the largest population first.

Each of the above recommendations is subject to further deliberation based on the public consultation, to be conducted after the issuance of this interim report.

Alberta is a vibrant representative democracy. The province will be divided into 89 electoral divisions for purposes of provincial elections. The people in each of those electoral divisions will vote for the person they want to represent their interests in the Legislative Assembly in the next election. It is the task of the Commission to ensure effective representation across the province.

I. Introduction to the Commission

The Commission was established on March 28, 2025. The Honourable Justice Dallas K. Miller was appointed by the Lieutenant Governor in Council as Chairman of the Commission. The Honourable Nathan Cooper, Speaker of the Legislative Assembly of Alberta, appointed four members of the Commission, two members nominated by the Leader of His Majesty's Loyal Opposition, and two members nominated by the Government. Those members are:

Greg Clark (Calgary)

John Evans, KC (Lethbridge)

Dr. Julian Martin (Sherwood Park)

Susan Samson (Sylvan Lake)

[The Electoral Boundaries Commission Act](#) (the "Act") is the legislation that authorizes the appointment of the Commission. It also provides the authority for the Commission and its function. The Act sets out the schedule for the Commission's public hearings leading up to what has become known as an "interim report." The Commission must hold further public hearings after it submits its "interim report" to the Speaker, and it has the discretion to amend its report and submit a final report to the Speaker. The final report must be submitted within five months of issuance of the interim report. The Chief Electoral Officer is to provide advice, information, and assistance to the Commission pursuant to the Act. The Act also provides Redistribution Rules in Part 2 to guide the Commission. Simply put, the "interim report" must be submitted to the Speaker of the Legislative Assembly by October 28, 2025, and the final report must be submitted to the Speaker by March 27, 2026.

The Commission first met in mid-April 2025. An initial half-day meeting of the Commission took place virtually via Microsoft Teams on April 16. A full-day in-person meeting took place in Edmonton on April 22. The Commission continued to meet during the public hearing process in late May and throughout June. Further virtual and in-person meetings occurred throughout the summer and fall of 2025.

Communication Plan

A public consultation communication plan was approved early in the Commission's mandate. Unlike previous Commissions, the typical "householder" or information card was not sent out to all Albertans. This was because of the high cost of mailing the card to every household in Alberta and the perceived ineffectiveness of this type of advertisement in 2025. A stakeholder letter was sent to Municipal Governments, School Boards, Members of the Legislative Assembly, Members of Parliament, Indigenous communities, and community organizations. The communication strategy was designed to create public awareness and build momentum for the public hearings and encourage attendance and participation. It also invited submissions through the Commission's website. The strategy sought to maximize media relation opportunities and other avenues for free promotion of the Commission's work. The primary focus of the communication strategy was to use social media to spread awareness and encourage public participation. This was done by focusing all communication to encourage and drive the public to the Commission's website, which has all the information in terms of the Commission's mandate, schedule of hearings, and how to make online written submissions. The Commission is satisfied that this approach to advertising through Facebook, Instagram, X, LinkedIn, and YouTube and through public digital billboards will be more efficient and will provide better value for money in 2025 than mailing out the typical householder card. Inviting Albertans in these various ways to visit www.abebc.ca is the most efficient way to communicate.

Opportunity for Public Input

The Commission provided an opportunity for Albertans to submit written proposals relating to new electoral divisions by way of webforms on the Commission's website, by email, and by ordinary mail to the Commission at Election Alberta's address. All those who made submissions had their personal information protected for privacy reasons. Submissions in this manner could be made between April 17 and May 23, 2025. During this period, 198 written submissions were received. An opportunity will be made available for individuals to revise their submissions after this interim report is made public. Written submissions have been maintained and are available for public viewing at www.abebc.ca.

The Commission held a series of public hearings across Alberta as required by the Act. These hearings took place in late May and throughout June. A total of 28 hearings were held in 16 different locations. Two additional virtual hearings were also held. Complete transcripts and audio recordings of the hearings as well as summaries of the written submissions received are available at www.abebc.ca. A complete list of dates and locations of the hearings is attached as Appendix A.

A list of persons who made written submissions can be found at Appendix B. A list of persons who made presentations at the public hearings can be found at Appendix C.

In addition to information received from the public through the website and mailed in submissions and the information gained at the public hearings, the Commission considered population data. The Commission worked hard to ensure that the most up-to-date and verified population data was used from Statistics Canada and the Alberta Treasury Board's Office of Statistics and Information.

An opportunity for Albertans to submit written responses to our interim report will be available in November and December 2025. A series of public hearings will be held by the Commission in January 2026 for input and response to this report. It is expected that given the time of year and the fact that the public will have something concrete to which to respond, the Commission will avail itself of virtual hearings as well as in-person hearings in Calgary and Edmonton. Those public hearings will allow the Commission to receive feedback on the recommendations in this interim report before it finalizes its recommendations and tables the final report with the Speaker by March 27, 2026. The dates and locations of the second round of public hearings and information on how to appear will be available on www.abebc.ca.

In this report, the term "electoral division," as found in the Act, and incorporating the definitions from the *Election Act*, RSA 2000, c. E-1 and *Electoral Divisions Act*, RSA 2000, c. E-4, is used interchangeably with the terms "constituency" and "riding."

II. Legal Requirements

The Commission's authority is the *Electoral Boundaries Commission Act*, RSA 2000, c. E-3 (the Act) and the principles from various decisions of the Supreme Court of Canada and Alberta Court of Appeal regarding the drawing of boundaries of electoral divisions. Court cases from other provinces can also help inform the work of the Commission.

Part 2 – Redistribution Rules of the Act sets forth the direction as to how the Commission does its work:

- 13 The Commission shall divide Alberta into 89 proposed electoral divisions.
- 14 In determining the area to be included in and in fixing the boundaries of the proposed electoral divisions, the Commission, subject to section 15, shall take into consideration the requirement for effective representation as guaranteed by the *Canadian Charter of Rights and Freedoms*, and in doing so may take into consideration
 - (a) sparsity, density and rate of growth of the population,
 - (b) communities of interest, including municipalities, regional and rural communities, Indian reserves and Metis settlements,
 - (c) geographical features,
 - (d) the availability and means of communication and transportation between various parts of Alberta,
 - (e) the desirability of understandable and clear boundaries, and
 - (f) any other factors the Commission considers appropriate.
- 15(1) The population of a proposed electoral division must not be more than 25% above nor more than 25% below the average population of all the proposed electoral divisions.
- (2) Notwithstanding subsection (1), in the case of no more than 4 of the proposed electoral divisions, if the Commission is of the opinion that at least 3 of the following criteria exist in a proposed electoral division, the proposed electoral division may have a population that is as much as 50% below the average population of all the proposed electoral divisions:
 - (a) the area of the proposed electoral division exceeds 20 000 square kilometres or the total surveyed area of the proposed electoral division exceeds 15 000 square kilometres;
 - (b) the distance from the Legislature Building in Edmonton to the nearest boundary of the proposed electoral division by the most direct highway route is more than 150 kilometres;
 - (c) there is no town in the proposed electoral division that has a population exceeding 8000 people;
 - (d) the area of the proposed electoral division contains an Indian reserve or Metis settlement;
 - (e) the proposed electoral division has a portion of its boundary coterminous with a boundary of the Province of Alberta.

- (3) For the purpose of subsection (2)(c), The Municipality of Crowsnest Pass is not a town.

Section 3 of the *Canadian Charter of Rights and Freedoms* states:

Every citizen of Canada has the right to vote in an election of members of the House of Commons or of a legislative assembly and to be qualified for membership therein.

Alberta has changed dramatically since the last EBC report of 2017 in terms of explosive population growth and social makeup. To some extent, this Commission's approach will be different for reasons explained herein. To observe and consider the change in Alberta, it is helpful to examine the history of electoral boundaries in the province. While the population and social makeup of the province has changed, the principles of representative democracy are timeless. The Commission needs to apply these timeless principles to a province that is rapidly changing. Understanding the principles is thus essential.

Many people who gave written submissions insisted that this Commission strictly apply the principle of representation by population. In other words, they have asked us to divide the boundaries based on "one person, one vote." A representative and concise submission in this regard is as follows: "Electoral seats should be based on equal population per seat across Canada no matter what the geographical hurdles are." Many of these submissions took particular aim at Lesser Slave Lake and Central Peace-Notley, which have populations that are barely 50% of the provincial average.

This certainly is the policy choice used by American states to draw the boundaries for elected congressional officials. Indeed, the Supreme Court of the United States has held that this principle is constitutionally mandated. This has, in turn, led to some very strange maps in the United States caused by an obsession with ensuring that electoral divisions have equal numbers of persons in them. However, this is not the approach taken by the Canadian Parliament or Provincial Legislatures in Canada.

In spite of the request to move to the American model of "one person, one vote," the Alberta and Canadian context does not mandate, and at times opposes, strict voter parity. Canada has historically taken a very different path from our southern neighbours. This has been consciously taken, fully aware of the American practice and jurisprudence. As the Supreme Court of Canada noted in 1991, "absolute parity is impossible [and] relative parity as may be possible of achievement may prove undesirable."

No Provincial or Federal Government in Canada's history has ever adopted the principle of "one person, one vote." Indeed, the Nova Scotia Court of Appeal, in *Reference re the Final Report of the Electoral Boundaries Commission*, 2017 NSCA 10, considered legislation that mandated relatively strict voter parity. It held that this legislation *itself* offended Section 3 of the *Charter*. In other words, overemphasizing the "one person, one vote" principle is not mandated—in fact, it is forbidden.

Alberta, like all provinces, has allowed significant variance from the average population to achieve effective representation. The 25% variance permitted (50% for up to four electoral divisions) is in line with Canadian averages. The average population of constituencies in Alberta is nonetheless higher than in any province except Ontario, as illustrated by the following chart, based on the most recent data provided by the Legislative Assembly of Alberta:

Province	Average Constituency Population
Ontario	114,709
Alberta	54,929
British Columbia	53,773
Quebec	51,291
Manitoba	22,427
Saskatchewan	14,306
Nova Scotia	13,312
Newfoundland and Labrador	12,863
New Brunswick	11,667
Prince Edward Island	3,704

Reasons for variances vary, which is not surprising in a federation such as Canada. Labrador, Northern Ontario, Northern Manitoba, Northern Saskatchewan, and Northern British Columbia, for instance, all privilege the ability for constituencies to have substantial Indigenous populations. Quebec has a standalone constituency for the unique region that is the Îles-de-la-Madeleine. Nova Scotia privileges constituencies with substantial Acadian and Black Nova Scotia communities. All provinces accept that rural electoral divisions can have, on average, lower populations than urban ones given the difficulty in representing rural electoral divisions. But there is no doubt that Canadian law neither mandates nor even countenances the consideration of the “one person, one vote” principle to the exclusion of other principles. The 25% variance permitted by Alberta legislation—extending to 50% for up to four electoral divisions—fits squarely within Canadian practice and jurisprudence.

A history of the Electoral Boundaries Commissions in Alberta is attached as Appendix D.

As a statutory body, this Commission’s work begins with analyzing its enabling legislation. Only one of six criteria in Section 14 of the Act mentions population. After reviewing the Act, the Commission must remain focused on the constitutional right of Canadian citizens in Alberta to vote and how that right has been interpreted by the Supreme Court of Canada and the Alberta Court of Appeal. The Act reminds us of our duty in this regard. This translates to ensuring “effective representation.”

The matter of electoral boundaries reached the Supreme Court of Canada in 1991, resulting in the now pivotal case of *Reference re Provincial Electoral Boundaries (Saskatchewan)*, [1991] 2 SCR 158 (often known as “Carter”). Justice McLachlin (as she then was), in defining the right to vote, stated:

It is my conclusion that the purpose of the right to vote enshrined in s. 3 of the *Charter* is not equality of voting power *per se*, but the right to “effective representation”. Ours is a representative democracy. Each citizen is entitled to be represented in government. Representation comprehends the idea of having a voice in the deliberations of government as well as the idea of the right to bring one’s grievances and concerns to the attention of one’s government representative; as noted in *Dixon v. B.C. (AG)*, [1989] 4 W.W.R. 393, at p. 413, elected representatives function in two roles -- legislative and what has been termed the “ombudsman role”.

What are the conditions of effective representation? The first is relative parity of voting power. A system which dilutes one citizen’s vote unduly as compared with another citizen’s vote runs the risk of providing inadequate representation to the citizen whose vote is diluted. The legislative power of the citizen whose vote is diluted will be reduced,

as may be access to and assistance from his or her representative. The result will be uneven and unfair representation.

But parity of voting power, though of prime importance, is not the only factor to be taken into account in ensuring effective representation. Sir John A. Macdonald in introducing the Act to re-adjust the Representation in the House of Commons, S.C. 1872, c. 13, recognized this fundamental fact:

... it will be found that ... while the principle of population was considered to a very great extent, other considerations were also held to have weight; so that different interests, classes and localities should be fairly represented, that the principle of number should not be the only one.

Notwithstanding the fact that the value of a citizen's vote should not be unduly diluted, it is a practical fact that effective representation often cannot be achieved without taking into account countervailing factors.

First, absolute parity is impossible. It is impossible to draw boundary lines which guarantee exactly the same number of voters in each district. Voters die, voters move. Even with the aid of frequent censuses, voter parity is impossible.

Secondly, such relative parity as may be possible of achievement may prove undesirable because it has the effect of detracting from the primary goal of effective representation. Factors like geography, community history, community interests and minority representation may need to be taken into account to ensure that our legislative assemblies effectively represent the diversity of our social mosaic. These are but examples of considerations which may justify departure from absolute voter parity in the pursuit of more effective representation; the list is not closed.

It emerges therefore that deviations from absolute voter parity may be justified on the grounds of practical impossibility or the provision of more effective representation. Beyond this, dilution of one citizen's vote as compared with another's should not be countenanced. I adhere to the proposition asserted in *Dixon, supra*, at p. 414, that "only those deviations should be admitted which can be justified on the ground that they contribute to better government of the populace as a whole, giving due weight to regional issues within the populace and geographic factors within the territory governed."

[pp 183-185]

Justice McLachlin rejected absolute parity of voting as a criterion that outweighs all others. In other words, she was rejecting the American system of one person, one vote. The 1961 U.S. Supreme Court case of *Baker v. Carr*, 369 US 186, which Justice McLachlin cited, is a leading case on the principle of "one person, one vote." That principle has been repeatedly affirmed over the years in the United States. Most recently in *Evenwel v. Abbott*, 578 US (2016), a unanimous Supreme Court affirmed the principle of "one person, one vote" on total population. In Canada, we have not followed that route.

This has very much been to the betterment of Canadian democracy. American approaches that have obsessed over "one person, one vote" have divided communities and led to electoral divisions with strange geographies that cannot be effectively represented. This has also provided cover to partisan gamesmanship, where those drawing electoral divisions can say that their maps are required to reflect the "one person, one vote" principle. Canada's system for drawing electoral boundaries has largely been shielded from allegations of this type of partisan activity. The history of independent Commissions typically chaired by judges have largely taken this task out of the hands of legislators in Canada. While legislators are free to reject Commissions' recommendations, they do so at their peril.

The Supreme Court of Canada has rejected the approach of the United States and has taken a more “pragmatic approach to electoral apportionment” based on the principle of “effective representation.” No doubt the focus on “effective representation” in Canada is due to differences in settlement, geography, and the concept of a constitutional monarchy as opposed to a presidential and republican system in the United States. The difference between a “melting pot” approach in the United States and a cultural mosaic approach in Canada no doubt affects the way citizens chose their elected representatives. The Court made it clear that our system of “effective representation” is *not* the tradition of absolute or even near-absolute voter parity.

The Court also recognized what to some is an obvious fact: that it can be more difficult to represent rural electoral divisions than urban electoral divisions. Rural electoral divisions are certainly harder to serve because of transportation and communication challenges. As well, it is well known that rural voters make greater demands on their elected representatives. As one rural MLA noted, it is uncontroversial that rural areas have a higher average age than urban ones. While we use total population to determine an electoral division's population rather than total voters, urban populations have more minors. Minors seldom make demands of their elected representatives, meaning that rural MLAs' constituents are individually more likely to make demands of their elected representatives.

The challenges of rural representation are certainly not meant to suggest that urban MLAs have “easy” jobs. The geographic footprint for a city MLA might be tiny compared to a vast, expansive area of a rural MLA. Even so, urban MLAs have unique challenges of their own, dealing with constituents who speak a dozen different languages, have extensive dealings with social services issues, and encounter issues of housing that are acute in certain urban areas.

The Supreme Court of Canada has indicated that a more broad-based approach to effective representation is required:

In the final analysis, the values and principles animating a free and democratic society are arguably best served by a definition that places effective representation at the heart of the right to vote. The concerns which Dickson C.J.C. in *Oakes* associated with a free and democratic society — respect for the inherent dignity of the human person, commitment to social justice and equality, respect for cultural and group identity, and faith in social and political institutions which enhance the participation of individuals in society — are better met by an electoral system that focuses on effective representation than by one that focuses on mathematical parity. Respect for individual dignity and social equality mandate that citizen's votes not be unduly debased or diluted. But the need to recognize cultural and group identity and to enhance the participation of individuals in the electoral process and society requires that other concerns also be accommodated [p 188].

The Court of Appeal in two decisions—*Reference re Electoral Commission Act (Alberta)*, 1991 ABCA 317 and *Reference re Electoral Divisions Statutes Amendments Act, 1993 (Alberta)*, 1994 ABCA 342—has dealt with apportionment of boundaries since the Supreme Court's *Carter* decision. In the 1991 *Alberta Reference*, the Court of Appeal stated its agreement with Justice McLachlin that absolute parity (one person, one vote) is impossible. The meaning of the right to vote under Section 3 of the *Charter* entails:

Subject to those disclaimers, we turn to the right to vote and the Supreme Court of Canada's decision in Carter. The rules we take from that case are these: the right to vote in s. 3 of the **Charter** includes:

- (a) the right to cast a ballot;
- (b) the right not to have the political force of one's vote unduly diluted;
- (c) the right to effective representation; and

(d) the right to have the parity of the votes of others diluted, but not unduly, in order to gain effective representation or in the name of practical necessity (para. 14).

Courts have shown deference to the Legislature and acknowledge that arriving at “effective representation” is a complicated task and requires some balancing. That principle from *Carter* and the 1991 *Alberta Reference* is further buttressed by subsequent case law underscoring the need for deference to administrative bodies such as this Commission, given the fact that the Legislature has entrusted the decision to us (see *Canada (Minister of Citizenship and Immigration) v. Vavilov*, 2019 SCC 67 at para 30). The Commission is also cognizant of what the Supreme Court has held as its duty to consider “*Charter* values” such as equality and democracy.¹

The Court of Appeal, in 1991, in a prescient statement, held:

This statement demonstrates how difficult is the idea of effective representation. If every group in society with a community of interest can elect its own member of the Legislature, they may not be encouraged to develop the mutual understanding and respect that is essential to a healthy democratic life. Shared representation might encourage mutual respect, just as it might also permit the repression of the voice of those who become permanent minorities [para., 20 emphasis added].

The Commission, in its hearings throughout the province, witnessed first-hand the benefits that can come from elected representatives understanding the experiences of those in different parts of the province as a result of travelling to and directly hearing from affected Albertans.

It is also worth emphasizing that effective representation does not guarantee any particular composition of a Legislature. Justice Huscroft of the Court of Appeal for Ontario recently underscored this in *Fair Voting BC v. Canada (Attorney General)*, 2025 ONCA 581.

The 1991 *Alberta Reference* case first referenced “hybrid” electoral divisions. This report will use the term “hybrid” unless quoting another source, though they are sometimes referred to as “blended” or “rurban.” This type of electoral division was reasonable and did not offend Section 3 of the *Charter* or adversely affect effective representation. On the contrary, such electoral divisions were held to be a reasonable way to achieve effective representation. At the time of the 1991 *Reference*, hybrid electoral divisions were a novelty. Today, they are more common (18 currently in Alberta) and may become more common due to the population growth, expansion of urban areas, the size of a Legislature that grows slowly, and the challenges of taking electoral divisions away from rural Alberta.

In the 1994 *Alberta Reference*, the Court of Appeal stated that variance from the average population for an electoral division must have reasons in order to justify the variance. The variance must be made only on the basis of a singular electoral division, not as part of a grand province-wide scheme. The Act provides for that approach. If there is a significant historic disparity of population between urban and rural electoral divisions that has become unreasonable, the choices are: **adding more electoral divisions to the Legislative**

¹ The concept of “*Charter* values” is controversial: see e.g., Matthew Horner, “Charter Values: The Uncanny Value of Canadian Constitutionalism” (2014) 67 SCLR (2d) 361; The Honourable Peter D. Lauwers, “What Could Go Wrong with Charter Values” (2019) 91 SCLR (2d) 1; Mark Mancini, “The Conceptual Gap Between *Doré* and *Vavilov*” (2020) 43:2 Dal LJ 793). However, the Supreme Court has recently held that administrative actors such as this Commission must consider these values, only to make it clear that *Charter* values are not determinative and *Charter* rights such as those found in Section 3 of the *Charter* are clearly more important than *Charter* values: see *Commission scolaire francophone des Territoires du Nord-Ouest v. Northwest Territories (Education, Culture and Employment)*, 2023 SCC 31, *contra* *York Region District School Board v. Elementary Teachers’ Federation of Ontario*, 2024 SCC 22. The Commission is particularly cognizant of the value of equality but does not consider it determinative as to any decision given the Commission’s other statutory and constitutional obligations. The value of democracy is of obvious importance and infuses the Commission’s work.

Assembly, taking electoral divisions away from the rural parts of the province, or creating more hybrid electoral divisions.

There is logic to this approach. Subject to difficulties in assessing it, population can be objectively assessed. In a democracy, it also means something for each voter to be treated equally in terms of the weight given to their vote. Academics have not denied that populations between electoral divisions can vary, even significantly, for legitimate reasons. They have nonetheless underscored that “the right to vote cannot be seen as so elastic as to encompass *dramatically* different results for *similarly situated* voters.”² In other words, different populations between electoral divisions are permissible so long as they are not dramatic and they reflect the fact that different voters are situated in different situations. Accordingly, while not overemphasizing voter parity, the Commission explains why it is recommending departures from the provincial average population.

Unlike population, other considerations require an element of discretion. Examples include: weight to be given to history; determining communities of interest; transportation routes; the vast distances in rural electoral divisions; and what makes for clear and understandable boundaries. These criteria remain tremendously important. As Justice McLachlin noted in *Carter*, population is only the starting point of analyzing how to achieve effective representation. It is incumbent on this Commission to consider the other factors prescribed in the Act and discussed in the case law.

There has been a clear trend (illustrated in Appendix D) towards greater emphasis on voter parity in Alberta, despite neither the case law nor the Act historically mandating this. The explosive population growth in Alberta and the consequential changes in the social makeup of the province require this Commission to approach its task in a more nuanced way. This involves a fulsome discussion of “effective representation” and the utilization of tools that both the courts and Legislature have provided to the Commission.

54,929 (the “average population”) is the perfect average number of Albertans for each of the 89 electoral divisions given Alberta’s total population of 4,888,723. That still does not take us to the American goal as espoused by those who advocate “one person, one vote.” We have long ended the concept of counting voters or electors for the basis of electoral boundaries. Within that number of 54,929 are persons under 18, non-Canadian citizens, short-term residents as of 2024, and others that may be ineligible to vote. If we could by some magic wand create 89 electoral divisions (which the Supreme Court acknowledges is impossible) with 54,929, the goal of “one person, one vote” would still not be achieved.

The tendency towards strict application of voter parity also fails to recognize the onerous task of representing rural electoral divisions. This is illustrated by the comments of a Member of the Legislative Assembly in 2017, when she responded to the final report of the 2016-2017 Electoral Boundaries Commission. Ms. Littlewood, the MLA for Fort Saskatchewan-Vegreville, explained concisely the challenges of an MLA in a rural electoral division:

Mrs. Littlewood: Thank you very much, Mr. Speaker. I appreciate the opportunity to speak about the boundary commission and its final report and just a little bit about the interim report. The way that the constituency of Fort Saskatchewan-Vegreville looks right now is – I’ll describe it to you. There are 12 municipalities, including villages, towns, and cities. There are four county municipalities. There are more than 10 agricultural societies. There are more than 20 schools. There are seven high schools, which means seven high school grads, seven high school awards nights. There are schools across the constituency, which is sometimes a lot of fun because you get to do Read In Week all across rural Alberta. Because there are so many municipalities, there are three Legion branches.

² Michael Pal, “The Fractured Right to Vote: Democracy, Discretion, and Designing Electoral Districts” (2015) 61:2 McGill LJ 231 at 249 [emphases added].

You know, everything in rural Alberta has an exponential factor. Each municipality has lodges, libraries, Elks clubs, Lions clubs, fish and game associations, ag service boards, Boys & Girls Clubs. Every summer is a tour of rodeos, parades, ag days. All year it's perogy dinners, steak fries, fish fries. I probably go to a hundred hot dog fundraisers a year, the same when it comes to pancake breakfasts – this is how a lot of fundraising is done in small municipalities – seniors' drop-in centres, fire departments both hired and volunteer, EMS services, junior trap shoots that take place in different rural areas. There are cemetery blessings that take place in many of these communities. There are rotating church services all across. It's a really, really diverse way of life. Anyone that thinks that it is sleepy in rural Alberta is quite mistaken. It is a nonstop way of being able to represent a constituency. [Hansard, Tuesday evening, November 28, 2017]

The Commission has approached its task by looking at the population growth of the province and examining where that growth has occurred. It has arrived at an electoral division population average of 54,929. This results in a target population range of 41,198 (25% below) and 68,662 (25% above) per electoral division. Effective representation includes populations within this range. It is the “effective representation range.”

We received some significant submissions that certain electoral divisions—notably, Bonnyville-Cold Lake-St. Paul, Fort McMurray-Lac La Biche, and Fort McMurray-Wood Buffalo—have significant “shadow populations.” “Shadow populations” are individuals whose permanent address is outside the electoral division and may even be outside the province, but who nonetheless receive services in the electoral division. While not adding to the provincial population, this phenomenon may result in “representation without taxation.” In other words, the “shadow populations” may increase these rural MLAs' workload, even if they are not part of the population for purposes of this report.

In arriving at the recommendation for the 89 electoral divisions in this report the Commission has:

- reviewed all written submissions;
- considered all presentations and submissions at our public hearings;
- assessed the available options in allocating the two new electoral divisions given Alberta's population growth;
- considered options for boundary changes in neighbouring electoral divisions given the new electoral divisions;
- considered the impact of removing more electoral divisions from the rural areas of the province; and
- considered the factors in Part 2 of the Act.

It is important in considering the term *effective representation* to have an understanding of representative government. Representative government is a form of indirect democracy as opposed to direct democracy or a “one person, one vote” system. Albertans are governed by elected representatives who receive a mandate to govern. In a study on electoral democracy, it has been noted that:

In choosing representative government, citizens restrict their participation in the governance of their society; they transfer the authority to govern to their representatives. In large societies, this is the

only practical means to secure orderly and efficient government while allowing for a measure of citizen participation. The fact that citizens can elect and “retire” these representatives at regular intervals serves to hold them responsible and accountable for what they do. Thus, elections become the critical method of reconciling order with freedom.³

³ *Reforming Electoral Democracy*, Volume I (Ottawa, 1991) at pp 26-27.

III. Sources of Population Information

Determining the population of Alberta for purposes of redistribution is a very important issue that has been contentious in the past. Section 12 of the Act stipulates how the Commission shall determine the population of Alberta:

- 12(1) For the purposes of this Part, the population of Alberta is to be determined by the Commission in accordance with this section.
- (2) In this section, “decennial census” means the most recent decennial census of population referred to in section 19(3) of the *Statistics Act* (Canada) from which the population of all proposed electoral divisions is available.
- (3) Subject to subsections (4) and (5), the Commission is to use
 - (a) the population information as provided in the decennial census, and
 - (b) information respecting the population on Indian reserves that are not included in the decennial census, as provided by the Department of Indian Affairs and Northern Development (Canada).
- (4) If there is a province-wide census that is more recent than the decennial census and from which the population of all proposed electoral divisions is available, the Commission is to use
 - (a) the population information as provided in the province-wide census, and
 - (b) information respecting the population on Indian reserves that are not included in the province-wide census, as provided by the Department of Indian Affairs and Northern Development (Canada).
- (5) The Commission may, as it considers appropriate, use more recent information respecting the population of all or any part of Alberta in conjunction with the information referred to in subsection (3) or (4).

The Constitution Act, 1867 requires a national census every 10 years (“decennial”). “Decennial census” in the legislation refers to that same national Canadian census. The last decennial census was conducted in 2021, and its results were released in February 2022. Those results are over four years old as of the issuance of this interim report. With the rapid growth of Alberta’s population, reliance on the 2021 decennial census alone is not appropriate. The Commission is required to use any updated information in the form of a province-wide census or recent population information “respecting the population of all or any part of Alberta” as more reliable population data to supplement any census data. In either case, the Commission is obliged to include the population on Indian reserves that are not included in the decennial (Federal census) of 2021 or any subsequent province-wide census.

Why are the 2021 census counts alone not ideal for the Electoral Boundary Commission’s task?

On Census Day 2021 Alberta’s population was 4,262,635. The most recent population estimate (January 1, 2025) pegged Alberta’s population at 4,960,097, an increase of almost 700,000 people.

This exceptional growth was not evenly distributed throughout the province. The cities of Edmonton and Calgary alone accounted for over three-quarters of the province’s growth between 2021 and 2024.

At the same time, 166 municipalities (out of 423) experienced minimal growth or a loss of population. The majority of Alberta's population growth since 2021 is clustered in and around larger urban areas and their satellite communities.

Thus, use of the 2021 census would result in significant error both in the size and distribution of Alberta's population. Collection for the 2026 census will take place in May 2026, but the results will not be available until February 2027, long after this Commission report is due.

The Office of Statistics and Information (OSI) is the official Alberta statistical agency, responsible for the collection, analysis, and dissemination of data and the development and publication of statistics for the province. The *Office of Statistics and Information Act* establishes the duties of the Office of Statistics and Information as the official Alberta statistical agency and Statistics Canada's focal point for the province.

Population estimates and projections are regularly produced by the OSI as part of its legislated mandate and are widely used across the province for funding calculations, planning, and budgeting, including for the provincial Budget and fiscal updates.

Why is the July 2024 population estimate the best available?

The timetable for the Commission is established by the Act, and the Commission must find and use the most appropriate population figures available as of the period leading up to October 2025. It is safe to say that the 2021 decennial census numbers updated by the estimated population figures from Alberta Treasury Board are the most accurate population information available to the Commission. During the entire term of the Commission, no new Canadian census data will be available except for the data of the 2021 decennial census updated by the OSI at Alberta Treasury Board.

The work of the Commission requires population figures at a sufficient level of granularity in order to form appropriate boundaries. Since the 2021 census is somewhat out-of-date, population estimates are the next best alternative. The OSI has produced population estimates at the dissemination area (DA) geographic level. Statistics Canada defined the 6,203 dissemination areas in Alberta with full coverage of the provincial territory.

In order to ensure the validity of the DA estimates produced by the OSI, it is necessary to “nest” the estimates with population estimates for other geographic levels produced by the OSI and Statistics Canada. The DA estimates must be consistent with estimates of other geographies of which they are a part. As DAs fit 100% into 423 municipalities (census subdivisions), and municipalities fit 100% into 19 census divisions, and census divisions fit 100% into the province, the DA population estimates must be consistent with estimates for the higher-order geographies.

Provincial and census division population estimates are regularly produced by Statistics Canada, while municipal (census subdivision) estimates are produced by the OSI on an annual basis.

In order to fulfill the consistency criterion, population estimates must be available for all these higher-order, sub-provincial geographies for the same time period. The most recent sub-provincial population estimates are referenced for the mid-year (July 1) of 2024. Note that the mid-year population is a standard demographic measure, representing the average population over a calendar year. All sub-provincial estimates are only available for the mid-year. The next mid-year release (July 1, 2025) of estimates for sub-provincial areas is set for February 2026, which makes the estimates unavailable for the current work of the Commission.

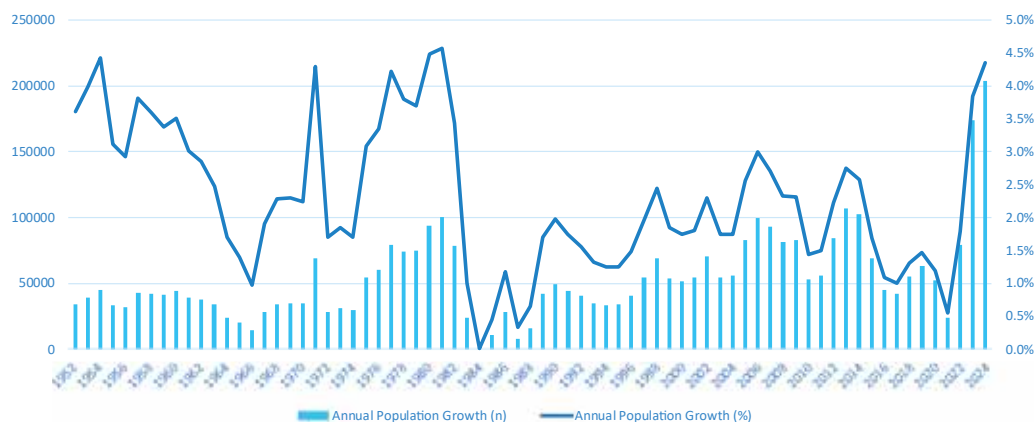
What method is used to estimate the population?

To estimate the 2024 mid-year population of dissemination areas, the OSI utilized a combination of evidence from administrative records and modelling. Changes in the Alberta Health registry file are a reliable indicator of population change in each dissemination area and are particularly effective in capturing population changes due to migration, which was the main driver of demographic change in Alberta since 2021. Estimates of dissemination areas were then modelled to ensure consistency with the next highest geographic order—the municipality (or census subdivision). The municipal estimates were produced by the OSI again using a combination of administrative records and modelling. In this case, the administrative records used included the Alberta Health registry file, vital statistics (births and deaths) files, MOVES (drivers' licence) files, and the Canada Child Tax Benefit. The municipal estimates were modelled to ensure consistency with the census divisions and provincial level estimates produced by Statistics Canada. The primary indicator files for these estimates include personal income tax files from the Canada Revenue Agency and Canada Child Tax Benefit along with files from Immigration, Refugees and Citizenship Canada.

The 2021 decennial census counted Alberta's population at 4,262,635, and the most updated population estimate verified by the OSI of the Alberta Treasury Board is 4,888,723. The population of Alberta was 15% higher in the most recent estimate compared to the most recent census.

A historic illustration of Alberta's population growth is best described in the following graph:

Annual Population Growth



Alberta

The Commission is mandated to divide the province into 89 electoral divisions. The average population of each of the 89 electoral divisions is therefore 54,929. This is an increase of 8,232 residents from the 2017 report. The figure of 54,929 persons per electoral division is a very important and helpful figure, but it is not the determining factor to allocate Alberta's electoral boundaries. This is the figure that shows absolute parity (or one person, one vote). Achieving that figure in each electoral division is impossible. Neither the constitutional right to vote and be elected nor the binding case law require absolute parity. The realities of the urban and rural landscape of Alberta also make it impossible to achieve perfect parity. **Effective representation** is the goal. This Commission can reach the goal of effective representation as long as the target range is reached. The statutory target range is broad, and

it ranges from 41,198 (25% below) and 68,662 (25% above). Such a variance was held to be consistent with Section 3 of the *Charter in Carter*. Granted, being close to the upper or lower end of that variance should have some rationale. The Alberta Court of Appeal has held that departures from parity require explanation. Insofar as this Commission does vary from the average, particularly when it does so significantly, we explain why we are doing so.

Historically, Electoral Boundaries Commissions have struggled with the appropriate population figures to use. While the province's population is a key factor in making the decision to redraw electoral boundaries, arriving at an accurate and agreed upon population is key. This Commission was aided by the instruction, data, and expertise provided by the staff at the Office of Statistics and Information. Lisa Zaporzan (Manager of Demography), Jennifer Hansen (Director of Demography and Economic Analysis), and the Chief Statistician Fred Ackah walked the Commission through the process of how the Alberta Treasury Board regularly updates and supplements the data received from Statistics Canada after each decennial census. The supplementary work performed by the OSI not only updates the Statistics Canada recent census data but verifies such data to ensure its accuracy. This process illustrates how federalism can work well between provincial and federal departments. The 2024 mid-year population figures were released in May of 2025. The Commission is unanimous in its approval to use these population figures. Therefore, for the work of the Commission, the number of 4,888,723 for Alberta's population is the most accurate and verified population that we have at our disposal.

IV. Jurisdiction of the Electoral Boundaries Commission

The Commission is encouraged by public response through written submissions to its website and input from individuals and groups who took the time to speak and present at one of the many public hearings across the province. It is clear to the Commission that Albertans take effective representation in the Legislative Assembly very seriously. This bodes well for the state of democracy in our province.

As a Commission, we must remind ourselves of our legislative mandate. We must inform the public and those who participated in the public process of our limitations. We recognize that a few of the submissions have focused on issues that are clearly outside of our mandate. Some of these include:

- any suggestion assuming a number of electoral divisions different from 89 as prescribed by the Act;
- suggestions of selecting Members of the Legislative Assembly by way of “proportional representation”;
- asking that we redraw municipal or federal electoral boundaries;
- submissions that request the drawing of boundaries that would result in a population above 25% of the provincial average (such as a submission proposing that the City of St. Albert be a single electoral division);
- requests that the Commission delay its work until after the 2026 census data has been released;
- suggestions related to campaign financing laws;
- suggestions on how to ensure the ability to vote for Albertans who cannot prove their addresses;
- suggestions as to where voting should physically take place;
- recommending that we send a message to Ottawa by using “one person, one vote” to force Ottawa to correct its electoral boundaries; and
- suggesting we use computer programs to update the electoral divisions more frequently than every election cycle.

Many of these and similar recommendations and submissions may very well improve the situation of representative government in Alberta. However, this Commission is limited in its investigative role and in how it makes recommendations to the Speaker of the Legislative Assembly. These suggestions are best submitted to Members of the Legislative Assembly or various committees of the Legislative Assembly.

The Commission’s mandate is **Part 2 – Redistribution Rules** of the Act. It is clear to everyone both implicitly by way of population and explicitly by virtue of an increase in the electoral divisions that this Commission will recommend changes. This means that we must discard submissions recommending that we not change the electoral boundaries at all. Section 12 of the Act requires us to determine the population of Alberta for the purpose of redistribution. That is our first task, and we have done that.

Our next step is to apportion the province into 89 electoral divisions up from the current 87. How we do that work is governed by Section 15(1) of the Act and related case authorities. The process and considerations are rather wide-ranging, and five specific considerations are directed along with a rather discretionary criteria of “any other factors the Commission considers appropriate” (Section 14(f) of the Act).

After determining the 89 electoral divisions or as part of the process in making that determination, the Commission must compare the population of each electoral division with the average electoral division population of 54,929, creating a target range of between 41,198 and 68,662. This comparison is required by the Act, which imposes limits on population variance, and case law such as *Carter*, which notes the significant (albeit not exclusive) importance of population parity.

The Commission must then decide the boundaries of the electoral divisions. Section 14 prescribes the factors that the Commission may consider in doing so alongside the overall ability to consider other “appropriate” factors:

- sparsity, density and rate of population growth;
- communities of interest, including municipalities, regional and rural communities, Indian reserves and Metis settlements;
- geographical features;
- the availability and means of communication and transportation between the various parts of Alberta; and
- the desirability of understandable and clear boundaries.

Moreover, the Commission can consider whether to recommend up to four “Section 15(2)” electoral divisions with populations up to 50% below the provincial average.

The Commission is not unaware of the rapid growth in Alberta’s population. Alberta is the only province whose population is significantly increasing due to intra-Canadian migration. In addition, the number of persons moving to Alberta from outside of Canada is even larger. While the legislation does not specifically include “anticipated population growth” as a factor for effective representation, it can certainly be captured under Section 14(f) of the Act.

In justifying each recommended electoral division, the Commission will draw upon specific submissions as appropriate. The fact that every representation is not explicitly referenced in the report does not detract from the fact that we considered all submissions, both written and from public hearings.

This Commission heard Albertans. However, it goes without saying that we cannot implement every suggestion or recommendation. Obviously, it is impossible to implement conflicting and contradictory recommendations.

We similarly considered the factors prescribed by Section 14 of the Act. We do not necessarily explicitly address every factor for every electoral division because not all are as relevant for every electoral division.

V. Public Hearings and Submissions

The Commission received and reviewed 198 written submissions. Some of the email submissions have been updated. The written submissions can be reviewed at the Commission's website.

From May 29 to June 19 the Commission held public hearings in Pincher Creek, Lethbridge, Edmonton (six hearings), Westlock, St. Paul, Wainwright, Drumheller, Calgary (six hearings), Brooks, Medicine Hat, Fort McMurray, Peace River, Grande Prairie, Slave Lake, Hinton, and Red Deer. This amounted to a total of 26 public hearings, some longer than three hours in duration.

The Commission easily travelled 8,000 kilometres for public hearings and Commission hearings up to the release of this report.

In addition, the Commission hosted two separate virtual hearings during which it received submissions from across the province. Because the time of year allowed for ease of travel, the Commission decided to focus on hearing from Albertans in person in their communities rather than utilizing technology to do more virtual hearings. Among other reasons, this enabled us, in a small way, to appreciate the vastness of the province and the challenges representing persons who live outside the major cities.

When this Commission toured the Northern Alberta communities of Fort McMurray, Peace River, Grande Prairie, Slave Lake, and Hinton over a four-day period, we did not travel by car. For sake of time savings and efficiency, we travelled by chartered plane. Some who appeared before the Commission said that that was regrettable as we did not get a flavour for the vastness of the North and the challenges of representing this area. We agree.

This interim report is based on the public hearings and written submissions received by the end of June. It is expected that during our second round of hearings in January 2026, greater use will be made of virtual hearings than in-person meetings.

VI. Major Themes in Public Submissions and Presentations

Submissions to the Commission reflected a variety of concerns. Unsurprisingly, there was significant overlap between the concerns and the statutory and constitutional requirements that the Commission must consider.

1. Voter Parity

Many submissions underscored the importance of “representation by population” and suggested that departures from strict voter parity must be exceptional and minimized. Other versions of such submissions were more realistic about the prospects of achieving absolute voter parity, but nonetheless urged caution before approaching or exceeding the 25% variance from provincial averages prescribed in the Act.

Most of these submissions, in different ways, underscored the importance of treating every voter equally. There were also submissions that suggested that it is more difficult to represent urban electoral divisions, given the different types of diverse communities disproportionately found within urban electoral divisions.

2. Rural Concerns

Representatives of, and residents in, rural communities generally had a much different view. They underscored that technology is not a substitute for having an MLA physically present at a community event, whether it be a summer barbeque, local rodeo, or high school graduation. In any event, the reliability of high-speed Internet and telephone access in some parts of rural Alberta is wanting. The amount of time a rural MLA must spend driving to attend such events is vastly greater than MLAs in Calgary or Edmonton. An urban MLA can easily have an MLA from a neighbouring electoral division attend an event in their absence. This is not an option available for rural MLAs, even if their budgets were increased (as perhaps they should be).

Rural MLAs have all the Indian reserves and Metis settlements within their jurisdiction. Representing these Albertans is an important constitutional duty that no urban MLA shares at this time.

More generally, there was a concern that Calgary and Edmonton dominate the politics of Alberta, and there is a real risk that the rural voice, which many believe power Alberta’s economy, will be unnecessarily diminished if further electoral divisions are taken away from rural Alberta. Industries such as agriculture and agri-business in Southern Alberta, forestry, oil, and agriculture in Northern Alberta, and natural gas in Western Alberta enable this to be the thriving province that it is. Ultimately, these voices submitted that effective representation justified having a lower average population in rural Alberta than in urban Alberta.

3. Urban Concerns

Many urban MLAs and their constituents noted that unique challenges also arise in representing urban areas, often related to the need to address diverse communities and assist in building new infrastructure. Edmonton-Meadows MLA Jasvir Deol made this point particularly well, reflecting on the communities in his constituency:

Those communities share deep cultural ties, family networks, and social cohesion. It is crucial that these bonds are preserved and not fragmented by boundary changes. When I ran in 2019, Edmonton-Meadows was already one of the most densely populated and multicultural ridings.

Since then it has grown around 20, 25 per cent of the average population for the riding. The average age is just 36, and a large percentage of residents, almost 20 per cent, are between the ages of five and 17. More than half of the population speaks a language other than English at home.

To serve this diverse population, my office employs multilingual staff and uses ethnic media to engage the community. We have taken a unique approach to budgeting and outreach to ensure we can meet our residents where they are culturally and linguistically.

The needs in this riding are significant and distinct. Educational infrastructure is urgently needed, especially new schools and early learning programs tailored to the young, diverse population. Health care access must include culturally appropriate and multilingual services. Immigration support is a major issue, and our office acts as a vital bridge for newcomers navigating challenges in their own language.

Many urban areas also have discrete issues of crime and homelessness that can arise in more acute ways than in other areas of the province.

4. Northern Concerns

Concerns similar to those expressed in rural Alberta were amplified in Northern Alberta, where it can take hours to drive to the electoral divisions from Edmonton, and hours more to travel between communities within them. In Peace River, Grande Prairie, and Slave Lake, MLAs and their representatives and constituents all underscored the vastness of the territory encompassed by the northern electoral divisions and the difficulty in representing them. If anything, these Albertans feel they are lacking effective representation as is, despite the fact that their electoral divisions have populations significantly below the provincial average. Air travel is simply not available or practical in order to overcome the many challenges. There is a significant lack of surfaced roads in these areas, particularly in an east-west direction. Rivers are often impassable, causing the electoral divisions to be lengthy from a north-south perspective. Moreover, as noted above, many of these areas have significant shadow populations.

5. Hybrid Electoral Divisions

The Alberta Court of Appeal has noted that there are three options available to address the fact that Alberta's population is becoming more concentrated in the cities of Calgary and Edmonton. Option 1 is to increase the number of seats in the Legislature. Option 2 is to decrease the number of rural seats and move them to Calgary and Edmonton. The third option is to create "hybrid" seats, which are partially rural and partially urban.

There was significant opposition to creating hybrid electoral divisions. The basis for this opposition ranged in rationale but included notions that rural and urban Alberta have significantly different representative concerns. For instance, concern was expressed that Calgary-East and Chestermere would end up in the same electoral division. Doubts were raised about the commonalities between these two communities.

This extended, to a lesser extent, outside the two largest cities. As discussed below, there were submissions both for and against dividing the cities of Lethbridge and Medicine Hat into multiple electoral divisions that would include surrounding rural areas. This is discussed in more detail while discussing the electoral divisions in Southern Alberta.

To be sure, this opposition was not expressed by all persons who gave feedback. Moreover, there was significant support to maintain hybrid electoral divisions outside Calgary and Edmonton. For instance, in Fort McMurray, local representatives expressed a strong desire to not create an electoral division that was purely urban, but rather to have the large rural area surrounding the city shared by MLAs whose electoral division would be partially urban. This, in their view, would enhance rather than detract from effective representation. Indeed, in the case of Fort McMurray, no serious argument was made against the hybrid electoral divisions, despite the population of Fort McMurray being sufficient to have an entirely urban electoral division. Historically, hybrid electoral divisions have worked effectively for almost 40 years in some parts of the province. Moreover, the line between rural and urban Alberta is not neat. As Dan Hein noted when he presented in Brooks, drawing on a career that has taken him throughout urban and rural Alberta and Canada, the “urban to [...] rural distinction is very much in flux at all times.”

6. Hybrid Electoral Divisions – Edmonton and Calgary

Historically, the Act has limited the use of hybrid electoral divisions to outside of Calgary and Edmonton. The new *Electoral Boundaries Commission Act* allows the Commission to consider blending areas inside and outside the boundaries of both cities. This is particularly important in high growth areas near the perimeters of both cities. The public feedback on this option remained skeptical.

As discussed in more detail in Appendix D, the opposition to hybrid electoral divisions is not new. However, there has also been opposition to taking divisions away from rural Alberta or creating sufficient new electoral divisions to reflect the shifting population from rural to urban Alberta. Changes to the Act to permit hybrid electoral divisions in Calgary and Edmonton give the Commission an additional tool to address concerns and values that may be in tension, but may not necessarily conflict.

7. Communities of Interest, Geographical Features, and Roads

Many submissions also concerned communities of interest. These submissions varied widely, ranging from propositions as to where communities outside Calgary and Edmonton receive their services to where individuals receive services in their cities.

Views in this regard were not unanimous, as is typical. For interest, submissions were made both in support of and contrary to the notion that Brooks, Bassano, and Medicine Hat are communities of interest that should share an electoral division. This is a discrete illustration of the fact that communities of interest, though important, cannot be dispositive in the drawing of electoral divisions.

The Act's requirement to consider “geographical features” became easy to consider in practice. For instance, in many parts of the province, rivers and creeks form major boundaries. From the North Saskatchewan to the South Saskatchewan to the Bow River to the Peace River to many more, rivers in particular denote where Albertans receive their services and often formed a logical basis upon which to draw boundaries. This was noted, for example, to be the case with respect to the North Saskatchewan River in Edmonton. This is also a challenge in South Calgary with respect to the Bow River.

County boundaries, which traverse municipal and rural interests as per Section 14 of the Act, are a way to determine communities of interest. Particularly in rural Alberta, these formed a logical basis to draw boundaries considering where individuals receive services. They also form a geographical feature, albeit one created by law.

The question of transportation, particularly roads, is related to these considerations. Alberta remains a province where driving is a prime mode of transportation. This is even codified in Section 15(2)(b) of

the Act as relevant to the drawing of electoral boundaries, specifically in relation to distance from the Legislature Building and, therefore, the central point for democratic activity in Alberta. Many submissions, particularly but not exclusively outside of Calgary and Edmonton, underscored the importance of ensuring that all parts of an electoral division are connected via roads. The Commission considers such a submission to be sensible and seeks to comply with it when practical.

8. Maintenance of the *Status Quo*

The Commission received significant submissions—across the province—from MLAs and their constituents that they are pleased with many of their electoral divisions' current boundaries. This is notwithstanding the fact that many of the divisions are quite large geographically, as submitted by Cypress-Medicine Hat MLA Justin Wright, or very dense, as exemplified by Edmonton-City Centre MLA David Shepherd and, despite her electoral division's higher-than-average population, Edmonton-Castle Downs MLA Nicole Goehring.

The Commission takes these submissions seriously. Constituents are used to being represented in a particular manner. If an MLA submits that the *status quo* is achieving effective representation, that warrants consideration. This is consistent with Justice McLachlin noting in *Carter* that “history” is a proper consideration in drawing electoral division boundaries.

The Commission can only put significant weight on these preferences for the *status quo* if other considerations are reasonably equal and keeping in mind the “cascading effect” of neighbouring boundary changes. As noted above, the Act explicitly and implicitly is expecting changes to Alberta's electoral division boundaries. Disruption to the *status quo* is unavoidable.

In addition, the Commission is pleased to report that 9 electoral divisions' boundaries are recommended to be unchanged. Changes in many others are modest.

VII. Reasons for the Commission's Recommendations

The Commission has considered all statutory criteria and submissions in making its recommendations. Insofar as they are particularly relevant to our process and individual electoral divisions, they are addressed below. But five particularly germane rationales are cited at the outset.

1. Representation by Population

Effective representation requires consideration of electoral divisions' populations. It is a useful starting point given that it can be assessed objectively. Other things being equal, having electoral divisions of relatively similar population is sensible, indicating the equality of voters. As such, the Commission follows the statutory requirement of having all non-Section 15(2) electoral divisions within 25% of the provincial average. We also explain variances and how they further the principle of effective representation. We were particularly sensitive to large discrepancies within Calgary and Edmonton. Variances continue to exist based on history, communities of interest, roads, infrastructures, rivers, and other considerations that are explained as the new recommended electoral divisions are introduced. The target range of population for effective representation is between 41,198 (25% below) and 68,662 (25% above) per electoral division.

2. Rural and Northern Concerns

A repeated concern that the Commission heard is that representing rural electoral divisions is more challenging than representing urban electoral divisions. This is not only because of challenges in communication and the difficulty in traversing vast rural territory and driving distances. Rural MLAs also need to correspond with and attend events in multiple municipalities and multiple school boards. Moreover, a typical rural constituent, whose average age is older than that of a typical urban constituent, places greater demands on their representatives than urban ones. In our view, this warranted rural electoral divisions, in the main, having lower populations than larger urban centres. This clearly complies with the Act, the *Carter* decision, and the Alberta Court of Appeal 1991 and 1994 references.

It is noted that many urban challenges can be overcome by hiring additional staff. Travel distances in rural areas cannot be solved in the same manner. Many submissions also suggested that technology could create a link between MLAs working in Edmonton and their constituents, or even minimize the need for MLAs to travel within rural electoral divisions. In the Commission's view, however, technology can mitigate but not eliminate the unique challenges that rural MLAs face.

These concerns were heightened in northern electoral divisions where the challenges in representation, particularly related to transportation, are even greater.

3. Hybrid Electoral Divisions

There is no doubt that, over time, Alberta's population has become less rural due to intra-Canadian and international migration. Previous Electoral Boundary Commissions, partially due to limitations placed on them by legislation, have responded to this trend by consolidating rural electoral divisions and adding electoral divisions to major urban centres.

While the goal of effective representation can be achieved flexibly, rural Alberta will have fewer seats in the Legislature notwithstanding the fact that the size of the Legislature has grown. Rural Alberta has unique interests that require representation in the Legislature. Technology can mitigate a few of the difficulties in representing rural areas but cannot eliminate all of them. It can take hours to drive to a rural electoral division from Edmonton, and several more hours to drive across one. Many urban

electoral divisions can be traversed by 15 minutes in a car, 30 minutes on a bicycle, two hours walking, or via a short CTrain or LRT ride.

The constant reduction of the number and percentage of MLAs and electoral divisions outside the major cities is continuing and may very well be unavoidable. Given Alberta's history since the early 1990s and the rapid growth of population and the nature of this growth, however, it may make sense to use the hybrid electoral division option in a more serious way. There will always be bodies that reflect the interface between large urban centres and surrounding areas. Examples at present include Intermunicipal Collaboration Frameworks, Edmonton regional water servicing, and Invest Greater Calgary. These entities can reflect similar geography and varied municipalities just like the new intended hybrid electoral divisions.

In the 1994 *Reference*, the Alberta Court of Appeal recognized three options to reflect the shifting balance in the distribution of Alberta's population:

Increase the size of the legislature such that, even though the number of rural MLAs is decreasing as a percentage of the legislature, the absolute numbers remain the same;

Move seats from rural Alberta to Calgary and/or Edmonton; or

Create hybrid electoral divisions that are partially rural and partially urban.

To the extent that Option 1 can be followed, it requires legislation. The Legislature has authorized the creation of two new electoral divisions for this redistribution. However, even placing both of these electoral divisions in the cities does not adequately provide for effective representation in Alberta's two largest cities.

Accordingly, we also followed Option 2, to some extent. The new proposed map has an additional three seats for Calgary and region (two of them in Calgary itself), and one additional seat in Edmonton. This means the rest of Alberta lost a net of two seats.

Removing a third seat from the rest of Alberta would not achieve effective representation. Because the legislation has changed, we are empowered to create a new form of hybrid electoral division, partially in Calgary or Edmonton and partially outside the city's boundaries. There was significant discussion and debate on this point among the Commissioners. Following that discussion and debate, we are proposing that we begin to follow Option 3, as the legislation empowers us to do. Accordingly, we propose to create four hybrid electoral divisions between the two large cities and surrounding areas: Calgary-West-Elbow Valley, Calgary-Cross, Calgary-Okotoks, and Edmonton-West-Enoch.

The Commission carefully considered how this option would assist us in our pursuit of effective representation, and we received significant public feedback on this matter. We have considered the creation of hybrid constituencies in and around Calgary and Edmonton using the principle of "hybrid constituencies if necessary but not necessarily hybrid constituencies." That is to say, we used hybrid constituencies judiciously and only where we believe it helped further the goal of effective representation.

The Commission acknowledges that public input has been skeptical of hybrid electoral divisions. But mature democracies must evolve according to social change. We consider introduction of these hybrid electoral divisions necessary to achieve effective representation for Albertans for several reasons. First, we note that hybrid electoral divisions are the norm in most cities other than Calgary and Edmonton. Fort McMurray, Grand Prairie, Medicine Hat, Sherwood Park, and St. Albert all share geography with rural Alberta. The same is true for smaller cities such as Cold Lake, Lloydminster, Fort

Saskatchewan, Camrose, Lacombe, Wetaskiwin, and Chestermere. The hybrid nature of representation in these smaller cities is to some extent required by population in a way not shared by Calgary and Edmonton, but it nonetheless indicates that effective representation is reconcilable with hybrid electoral divisions. Moreover, many of these smaller cities have areas where the population is denser than in parts of Calgary or Edmonton. For example, Lethbridge-West, geographically, is far smaller than Calgary-Peigan.

Currently, Alberta has 18 hybrid electoral divisions, in that their territory is partially in a city and partially outside of that city's boundaries. As well, historically the Legislature has been loath to create more electoral divisions to keep up with population. For example, seven general elections occurred between 1986 and 2008 using 83 electoral divisions. Four more elections took place since 2012 using 87 electoral divisions. Based on comparative data, it is arguable that the proposed number of 89 electoral divisions makes the demands on Alberta MLAs among the highest in the nation in terms of represented population, with the exception of Ontario. This is after the increase to 89 electoral divisions!

One presenter from Southern Alberta insisted that Lethbridge be treated the same as Calgary and Edmonton. While this may not be possible, it is not unreasonable to have Alberta's two largest cities begin to reflect what goes on in the rest of the province.

Second, the assertion that an MLA could not effectively represent urban and rural concerns is belied by two examples. First, currently 18 MLAs do in fact represent both concerns. Second, 13 federal Members of Parliament in Alberta also routinely represent constituencies with urban and rural populations.⁴ We are confident that the democratic process can rise to new challenges.

Third, the Commission is concerned that viewing rural and urban Alberta in constant opposition to each other tends to increase polarization. While this province is less rural than it has been in the past, approximately 40% of the population resides outside Calgary or Edmonton. Having MLAs who represent both a city and areas not in a city may cause MLAs to understand issues important to all aspects of Alberta society. It will help depolarization and increase understanding.

Fourth, these particular electoral divisions are discrete. Due to Highway 8, the rural portions of Elbow Valley are very connected to the services in the City of Calgary within the electoral division boundaries. This is amplified with respect to the link between Conrich and Calgary-Cross, as Conrich's residents are highly likely to receive services in Calgary. The relationship between Enoch Cree Nation and Edmonton is very strong and likely stronger than Enoch Cree Nation's relationship with municipalities within Stony Plain-Drayton Valley-Devon. In other words, we do not consider it likely that the urban and non-urban parts of these electoral divisions are likely to have particularly divergent interests. Indeed, though most submissions we received were skeptical of hybrid electoral divisions, we received submissions explicitly advocating for all three of these hybrid electoral divisions. In this vein, the submission from Kim Magnuson is telling: urging "a very cautious mix of urban and rural in the areas around cities and large towns" but recognizing "where there are great similarities between urban and rural (acreages), I see the benefit of putting them all in the same constituency." This may be the way of the future.

We acknowledge this is likely not as true with respect to Calgary-Okotoks. Nonetheless, for reasons discussed below in the context of ensuring effective representation for South Calgary, the Commission is proposing Calgary-Okotoks despite a lack of explicit advocacy, given the myriad considerations this Commission must balance.

⁴ Airdrie-Cochrane, Battle River-Crowfoot, Bow River, Fort McMurray-Cold Lake, Grande Prairie, Lakeland, Leduc-Wetaskiwin, Lethbridge, Medicine Hat-Cardston-Warner, Ponoka-Didsbury, Red Deer, Sherwood Park-Fort Saskatchewan, and St. Albert-Sturgeon River.

Fifth, the line between rural and urban is blurry. These are not scientific terms or even legal terms used consistently throughout Alberta legislation. There are areas within city boundaries that are transitioning and more akin to acreages and even farms. Similarly, there are areas that are not legally in cities that have dense populations and are more culturally suburban. The province is perhaps best considered as being divided into the “urban cores” of Calgary and Edmonton, areas of these cities outside urban cores (more suburban), the “doughnut” areas outside Calgary and Edmonton, truly rural electoral divisions, small cities, and the North. Similarly, within areas neighbouring cities, there is a difference between small cities such as Airdrie, Chestermere, St. Albert, and Spruce Grove, and acreage-dominated areas found in Leduc County, Strathcona County, or Rocky View County. Of course, the fact that the line between these different types of areas can be blurry does not mean that there are not clearer delineations of interests that may have significant overlap with municipal boundaries. We view municipal boundaries to be helpful delineations of interests, and they also assist in creating clear boundaries, if other considerations are reasonably equal. However, other considerations are not always reasonably equal. The spectrum of areas of the province is another reason that city boundaries cannot be treated as impermeable borders never to be crossed as impediments to effective representation. Calgary, for example, has historically annexed land as it has grown. Then there are electoral divisions that do not fit neatly into any of these categories.

Sixth, if the distinction of interests being asserted by many opponents of hybrid electoral divisions is in fact about issues, say, LRT or irrigation agreements, then one can readily agree. But these issues are discrete. All elected officials share fundamental commitments and goals of good governance.

Seventh, the trend towards urbanization continues. If we are to avoid eliminating rural electoral divisions, thereby making them unreasonably large, more hybrid electoral divisions must be considered. This is the way of the future.

A list of current and proposed new hybrid electoral divisions is found in Appendix F.

The Commission acknowledges that hybrid electoral divisions are not necessarily good in themselves. They can be used in ways that undermine effective representation. But abuse of hybrid electoral divisions certainly does not prohibit their proper use when they facilitate effective representation.

4. Projected Growth

While it is difficult to define the rate of future growth with precision, the Commission bore in mind that the rate of growth in population across the province is not the same, and growth is expected in certain areas more than others.

5. Balancing the Factors

We grant that there is no “one correct way” to weigh the relevant factors. Reasonable people can disagree regarding how we balanced them. Indeed, we disagreed among ourselves regarding the ideal weight to give to different factors. But we have agreed with 89 electoral divisions that, in our view, strike a reasonable balance given the aforementioned factors.

We recognize that effective representation can be achieved by balancing several factors found in the case authorities and the Act. As will be discussed further below, we have designed 89 electoral divisions, each of which can be effectively represented by a Member of the Legislative Assembly. We note why variances from the provincial average population can be justified, but this is out of an abundance of caution, given that we are not close to offending constitutional or statutory limits on permitted population variance.

As a Commission, we may be accused of using less than perfect solutions for impossible problems. We have, however, reached unanimity on how to draw 89 electoral divisions to ensure effective representation for Albertans.

VIII. Process in Drawing the Boundaries

The work of the Commission is to create a province-wide political blueprint. Not all the rooms are the same size—but the proposed foundation is solid. This is necessary for the house of democracy we call Alberta.

1. Macro-level Decisions

The Commission first considered how to allocate the two additional electoral divisions mandated by the Act. It is obvious that Calgary required an additional electoral division and Edmonton also required an additional electoral division. Given the population redistribution towards the two main cities, it was further decided, although with some reluctance given a desire not to take additional electoral divisions away from rural Alberta, that Calgary should in fact receive two additional electoral divisions.

The pragmatic consequence of this was the need to reduce the number of seats in the rest of Alberta by one. But population changes in Airdrie and Cochrane also made it obvious that those cities share three electoral divisions rather than two. Therefore, the remainder of Alberta required a net reduction of two seats. The first seat was eliminated in the rural central-west of the province as, to oversimplify slightly, six electoral divisions were consolidated into five:

	Current Electoral Division	Recommended Electoral Division
1	Banff-Kananaskis	Banff-Jasper
2	Maskwacis-Wetaskiwin	Wetaskiwin-Maskwacis-Ponoka
3	Innisfail-Sylvan Lake	Sylvan Lake-Innisfail
4	Olds-Didsbury-Three Hills	Mountain View-Kneehill
5	Lacombe-Ponoka	Lacombe-Rocky Mountain House
6	Rimbey-Rocky Mountain House-Sundre	

The Commission further reluctantly concluded that an electoral division needed to be removed from the North. The Commission is very sympathetic to the challenges of representing the North. It continues to consider the population variances there to justifiably be the highest in the province. The average variances in the Far North of the province were 18%, with those variances in two electoral divisions approaching 50%. In a Legislature with only 89 electoral divisions, all of which needed to achieve effective representation, preserving the electoral divisions in their current form became untenable. The Commission sought to mitigate the negative consequences of removing an electoral division by making electoral divisions in the “Near-north” more northern in their orientation, and attempting to preserve an electoral division with a significant Indigenous population. The elimination of the electoral division was mostly achieved by making amendments to the following seven electoral divisions (which the creation of Banff-Jasper also facilitated):

	Current Electoral Division	Recommended Electoral Division
1	Grande Prairie-Wapiti	Grande Prairie-Wapiti
2	West Yellowhead	West Yellowhead
3	Lac Ste. Anne-Parkland	Lac Ste. Anne-Parkland
4	Athabasca-Barrhead-Westlock	Slave Lake-Westlock-Athabasca
5	Lesser Slave Lake	Mackenzie
6	Central Peace-Notley	Peace River-Notley
7	Peace River	

2. Calgary

After making macro-level decisions, the Commission first considered the map of Calgary. Given the decision to add two additional electoral divisions to Calgary, and based on changes in population within Calgary since the last redistricting, it was decided that an electoral division should be added to the north end of the city, leading to a new electoral division named Calgary-Nose Creek, partially relieving the very high population of Calgary-North East. The results of this cascaded into changes on the north end of the city. An additional electoral division, Calgary-Confluence, is also proposed in the city centre, cascading eastward, partially relieving the very high population of Calgary-Buffer. This results in electoral divisions previously considered to be in the city centre having their boundaries pushed further south, enabling some of the electoral divisions in the south of the city to be smaller, both geographically and population-wise, than was previously the case.

It is recommended that parts of Rocky View County centred on the Hamlet of Conrich, west of Chestermere but south of the Airdrie-East electoral division, be added to Calgary-Cross. This creates clearer lines among the electoral divisions in east Calgary, and balances populations between Chestermere-Strathmore and Calgary-Cross. This change was explicitly advocated for by multiple submissions. It is also recommended that the Elbow Valley be moved from Banff-Kananaskis to Calgary-West, creating Calgary-West-Elbow Valley. This was also advocated for by submissions and reflects the Elbow Valley being more connected in many ways to Calgary than to the major urban centres in the new Banff-Jasper electoral division.

The Commission struggled greatly with the map of South Calgary, particularly the four most southern electoral divisions: Calgary-Fish Creek, Calgary-Lougheed, Calgary-Shaw, and Calgary-South East. The Commission is extremely content with the boundaries of the other 24 electoral divisions in Calgary and did not wish to change them, lest cascading effects detract from effective representation. This resulted in these final four electoral divisions having sub-optimal borders, in terms of not being clear and being less polygonal. Moreover, their populations, while within the range for effective representation, were undesirably high. Accordingly, the Commission is recommending an additional 0.3 of a seat for Calgary: Calgary-Okotoks, consisting of the far southwest corner of Calgary, the Town of Okotoks, and the areas of Foothills County in between them. This enables the other four electoral divisions in the south of Calgary to have smaller populations and clearer borders. Unlike the three other hybrid electoral divisions involving Calgary and Edmonton that the Commission is proposing, we acknowledge that Calgary-Okotoks will be controversial based on feedback we received. We are presenting it to the public with humility and a desire for thoughtful feedback. The Commission is of the view that this map of Calgary:

- keeps communities of interest in common;
- has clear boundaries; and
- has reasonably equal populations.

An alternative map that would remove the areas in Calgary from Calgary-Okotoks and have cascading effects on Calgary-Fish Creek, Calgary-Lougheed, Calgary-Shaw, and Calgary-South East has been discussed by the Commission. The Commission views this “Plan B” map to be less desirable because its boundaries do not reflect major roads and rivers to the same extent. Moreover, it increases the population gap between South Calgary and the rural south of the province, specifically by creating “Okotoks-Diamond Valley” and in turn reducing the populations of High River-Vulcan and Livingstone-Macleod. If the public indicates its preference for the “Plan B” map, which is found in Appendix H, the Commission will take that seriously. The “Plan B” map still achieves effective representation. However, this will undermine arguments that negatively cite an aggregate population gap between Calgary and the rural south of the province.

Ultimately, the Commission is of the view that the 28.3 recommended electoral divisions for Calgary all work together as an urban mosaic for effective representation. Moreover, the electoral divisions are all well within the 25% variance permitted by the Act and held to be legal under *Carter*. Indeed, all variances are within 11% of the provincial average. This is illustrated in Appendix E.

3. Edmonton

The Commission next turned its attention to Edmonton. An obvious decision was made that Edmonton would have an additional electoral division. One of the most striking features of the population redistribution within Edmonton has been the overrepresentation of the urban core compared to provincial and city averages: six electoral divisions in the urban core all had populations below the provincial average, in some cases by more than 10%: Edmonton-City Centre, Edmonton-Highlands-Norwood, Edmonton-Gold Bar, Edmonton-Strathcona, Edmonton-Riverview, and Edmonton-Glenora. These electoral divisions are growing at slower rates than more suburban areas of Edmonton. Moreover, all are easily traversed and very close to the Legislative Assembly Building. No compelling reason could be offered as to why these electoral divisions were underpopulated compared to the province as a whole. On the contrary, they are electoral divisions that can easily be traversed in a car, a bicycle, LRT, or even on foot, and where infrastructure is shared within communities. Moreover, these electoral divisions are closest to the Legislature. Indeed, the Legislative Assembly Building is in one of these electoral divisions. As such, the Commission elected to remove an electoral division from the urban core. This enabled adding *two* new additional electoral divisions elsewhere in the city, one in the Southeast, and one traversing the West and Southwest. It was further decided to include Enoch Cree Nation and adjacent parts of Parkland County in the latter division, considering the link between Edmonton and Enoch Cree Nation.

Adjustments to North Edmonton were modest, and in the case of one division, non-existent. The 2017 Commission had drawn a map that logically facilitated effective representation, due to grouping communities of interest, and being closely related to city and provincial averages in terms of populations. Significant feedback supported keeping many of these electoral divisions in their current form or with minimal changes, illustrated by submissions discussed below in the context of Edmonton-North West and Edmonton-Castle Downs.

The south of Edmonton has experienced very rapid population growth over the past decade. By way of example, Edmonton-South West has grown from 45,901 to over 78,000 since the last redistricting. While the previous electoral divisions provided helpful starting points for the electoral divisions in this area of the city, the recommended addition of two new electoral divisions makes comparisons to the previous map more challenging.

Ultimately, the Commission is of the view that the 21 recommended electoral divisions in Edmonton all work together as a vehicle for effective representation. Moreover, the electoral divisions are all well within the target for effective representation. A chart illustrating all of these electoral divisions is in Appendix E.

The Commission finds the departures from the provincial averages to all be justifiable, for reasons noted above, according to the *Carter* decision and binding Alberta Court of Appeal decisions. All fall within the 25% variance permitted by the Act. Indeed, there are no variances of more than 12.6% from the provincial averages.

Any significant reduction of population in each Edmonton electoral division by adding one more electoral division to the city would significantly reduce and change the boundaries of many electoral divisions in Edmonton. Not only would this fail to provide effective representation for other parts of

Alberta; it is also against the wishes of many Edmonton MLAs, particularly north of the North Saskatchewan River, who wanted their electoral boundaries to remain largely unchanged.

4. Adjacent to Calgary and the Rural South

Areas adjacent to Calgary—particularly Airdrie—have experienced astonishing growth since 2017. This necessitated the creation of an additional electoral division bordering Calgary as two electoral divisions to the north and west of Calgary (Airdrie-Cochrane and Airdrie-East) become three. This has some cascading consequences on other areas in the Rural South and adjacent to Calgary.

The creation of Calgary-Okotoks as essentially a replacement for Highwood allowed the creation of High River-Vulcan, replacing Cardston-Siksika. Cardston-Siksika's geography was undesirable for several reasons. As Tim Court submitted, "Cardston Siksika is shaped like an hour glass, stretching from the US border to the Siksika reserve east of Calgary. It was poorly planned out. The southern portion has little in common with the NE portion 225 km away." As a Commission, we understand the need to "shoehorn" some electoral divisions. Even so, Lisa Reis, Deputy Mayor of Coaldale, made similar observations, as did Lethbridge resident Marc Slingerland. As Cardston Reeve Randy Bullock submitted, "It's not too late to change the figure eight." High River-Vulcan brings together rural parts of three neighbouring counties with many more common interests.

The creation of High River-Vulcan in turn enabled a reduction in the geography of Chestermere-Strathmore (further facilitated by the changes to Calgary-Cross, noted above).

Because of these changes adjacent to Calgary, Banff-Kananaskis was able to absorb Jasper and parts of Clearwater County. Not only did this accord with received submissions, but it helped eliminate an electoral division from both the rural central and north of the province, as will be discussed below.

The replacement of Cardston-Siksika by High River-Vulcan allowed a re-creation of Cardston-Taber-Warner as a standalone electoral division, with some collateral consequences on Livingstone-Macleod.

The Commission elected to leave the two Medicine Hat electoral divisions mostly unchanged, and also made only a minor amendment to Drumheller-Stettler.

The only changes recommended to the two Lethbridge electoral divisions are made to balance population between them and reflect where growth is likely to occur. The Commission acknowledges that significant submissions were made regarding Lethbridge. Several of these submissions recommended that the City of Lethbridge be divided into four, with each quadrant sharing an electoral division with rural areas surrounding Lethbridge. This was partially based on the model of Medicine Hat, which is divided into an agri-business corridor that blends rural with urban. Like in Medicine Hat, these submissions concerning Lethbridge were based on regionally integrated economies and trade corridors. This would create six electoral divisions across the south of the province, each being partially rural and partially urban, reflecting the integration of Medicine Hat and Lethbridge and their surrounding rural areas. The Commission suggests that more work needs to be done on this issue in terms of recognizing the integrated economics of the agri-business industry in Southern Alberta.

The Commission was indeed intrigued by this possibility, as a way to reflect the link between the City of Lethbridge and its surrounding rural areas. This increase in hybrid electoral divisions would also reduce the need to remove electoral divisions from rural Alberta. It would also reflect the integration of Southern Alberta in terms of economics, industry, and agriculture.

We have opted not to pursue this path at this time. Other local residents opposed this, arguing that Lethbridge County and the City of Lethbridge have markedly different interests, and the city's

representation would be diluted in the absence of two MLAs representing solely these areas. While we did not consider this opposition determinative, and, in the abstract, were sympathetic to the contrary view, a pragmatic implication nonetheless weighed large: the boundaries of the two divisions within the city are clearly logical and facilitate effective representation with minor changes to the boundaries, to reflect disparate historical population growth and anticipated future population growth between the two electoral divisions.

As a result of these changes, the Rural South (excluding Airdrie and Cochrane) has close to the number of electoral divisions that it previously held. Adjacent electoral divisions had their boundaries adjusted with electoral divisions neighbouring them, bearing in mind the principle of effective representation and the requirement for populations to not vary by more than 25%. Indeed, with three exceptions (Livingstone-Macleod, Airdrie-West, and Drumheller-Stettler), no electoral divisions varied from the provincial average by more than 5%. Those variances are justifiable for reasons noted in the descriptions of the electoral divisions.

We should note that we are defining “the South” (and, accordingly, “the Rural South”) to essentially be those areas of the province parallel to or south of the Airdrie electoral divisions: basically, the southern third of the map of Alberta.

5. Rural Central

Due to the addition of a net additional electoral division in Edmonton, two new electoral divisions in Calgary, and one in the Airdrie/Cochrane area, two electoral divisions needed to be removed from the rest of Alberta. The addition of Jasper to Banff-Jasper and parts of Rocky View County to Airdrie-East helped bring the Commission some way towards this requirement. This needed to be considered as the Commission turned north in its boundary determinations.

In light of the cascading consequences of those changes further south, and seeking to disrupt the *status quo* to the minimal extent feasible, the Commission decided to remove Rimbey-Rocky Mountain House-Sundre, with its territory being divided between five neighbouring electoral divisions:

- a) Lacombe-Rocky Mountain House (a replacement for Lacombe-Ponoka);
- b) Wetaskiwin-Maskwacis-Ponoka (a replacement for Maskwacis-Wetaskiwin);
- c) Banff-Jasper (a replacement for Banff-Kananaskis);
- d) Sylvan Lake-Innisfail (a replacement for Innisfail-Sylvan Lake); and
- e) Mountain View-Kneehill (a replacement for Olds-Didsbury-Three Hills).

The Commission is reluctant to remove electoral divisions from rural Alberta. It nonetheless considered this necessary given the constraints placed upon it by the legislation and the case law to ensure effective representation for all Albertans. The effects of the removal of Rimbey-Rocky Mountain House-Sundre on these five electoral divisions had cascading effects elsewhere in the province. The Commission notes that the four electoral divisions along the Highway 2 corridor north of Airdrie and south of Leduc follow county boundaries much better than the previous map, have relatively balanced populations, and keep communities of interest in common. This will ensure effective representation.

Minor adjustments were made further east in the province to reflect submissions and balance populations between Camrose, Drumheller-Stettler, Vermilion-Lloydminster-Wainwright, and Fort Saskatchewan-Vegreville.

The removal of Jasper from the West Yellowhead electoral division allowed West Yellowhead to absorb all parts of Yellowhead County and Woodlands County that were previously not part of it. This

kept communities of interest in common, facilitated effective representation, and balanced populations. These changes, as well as the decision to move the Town of Swan Hills and portions of Big Lakes County previously in Athabasca-Barrhead-Westlock into West Yellowhead, also facilitated changes adjacent to Edmonton and in the North.

In sum, all electoral divisions in this area of the province provide for effective representation, with no electoral divisions approaching the 25% variance permitted by the Act. Indeed, only two electoral divisions (Drumheller-Stettler and West Yellowhead) vary from the provincial average by more than 5%, and in both cases that is amply justifiable due to their large geographies.

6. Adjacent to Edmonton

The region around Edmonton is clearly integrated into the city to a significant extent as this region has also experienced rapid growth since the last redistricting. While the number of electoral divisions bordering Edmonton remains the same, adjustments to their borders were necessary, which had collateral consequences on electoral divisions further from Edmonton.

Even so, the changes to this area of the province were relatively modest. The most notable changes include: a) the City of Beaumont being divided into two, with its eastern half being paired with Strathcona-Sherwood Park and its western half being paired with Leduc-Beaumont; and b) the City of Spruce Grove being placed at the heart of its own electoral division, with the Town of Stony Plain being added to Drayton Valley-Devon to form Stony Plain-Drayton Valley-Devon. These had cascading effects, notably on Camrose, Lac Ste. Anne-Parkland, and Sherwood Park. The addition of Enoch Cree Nation and surrounding areas to the new electoral division of Edmonton-West-Enoch facilitated these changes.

The eight electoral divisions that border Edmonton all keep communities of interest in common and respect municipal boundaries and major roadways to the extent feasible. Seven of them are within a 5% variance from the provincial average population, and the eighth is within 10%. All of these electoral divisions will be vehicles for effective representation.

7. The Near-north and the North

The Commission is unanimously of the view that population variances are most warranted in the North, particularly the far north, of the province. The northern electoral divisions are united by their particularly vast geographies, the relatively sparse population, the numerous Indian reserves and Metis settlements, the importance of the oil, gas, and lumber industries, and the fact that it takes hours to drive across them, and hours more to drive to the Legislature in Edmonton. While the Commission traversed this area of the province via airplane, it would have taken us over nine hours to drive from Fort McMurray to Slave Lake to Peace River.

However, the Commission could not accept that it would best facilitate effective representation for Albertans if almost all variances from provincial average populations were concentrated in the north of the province. The electoral division of Central Peace-Notley is particularly illustrative. Its population was 48% below the provincial average. Its geographic size and location clearly warranted a significant variance. It did not, however, warrant a variance of nearly 50% when similarly sized electoral divisions such as Drumheller-Stettler, Fort McMurray-Lac La Biche, Fort McMurray-Wood Buffalo, and West Yellowhead have nowhere near that degree of variance. The Commission has accordingly drawn an electoral division, Peace River-Notley, that respects the Peace Region and has a significant, but comparatively more modest, variance in population. The Peace River corridor requires effective representation, but that can be achieved through a single MLA, especially if that MLA is not also representing Mackenzie County.

The Commission was more sympathetic to Lesser Slave Lake warranting a particularly large population variance given the interests of Indigenous Albertans. However, its population had fallen to below 50% of the provincial average. In other words, for Lesser Slave Lake to even qualify for Section 15(2) protection, additional territory would have had to have been added to it. The obvious choice was the Town of Swan Hills, but this would have reduced the percentage of the electoral division that is Indigenous, despite the fact that the relatively high percentage of the electoral division that is Indigenous is a significant reason why the electoral division was granted protection by Section 15(2) of the Act.

The simplest solution to the Commission's dilemma would have been to place the four municipalities in Lesser Slave Lake (MD of Opportunity, MD of Lesser Slave River, Big Lakes County, and Northern Sunrise County) into each of the adjacent electoral divisions. The Commission nonetheless sought to mitigate the effect of removing an electoral division from the North with particular attention to the interests of Indigenous Albertans, whose interests do not fit neatly into either the economies or culture of either the Peace River corridor to the west or the Fort McMurray corridor to the east. This would also have left the Peace Region with two electoral divisions, which seemed unnecessary to achieve effective representation. The Commission therefore sought to ensure that the northwest of the province has an electoral division in the Peace River corridor, with the North Central having an electoral division with a particular view to the interests of Indigenous Albertans.

Accordingly, the Commission elected to merge the electoral divisions of Peace River-Notley and Peace River but for Saddle Hills and Mackenzie Counties and Paddle Prairie Metis Settlement. While the MD of Lesser Slave River required being moved to Slave Lake-Westlock-Athabasca for reasons of population and integration with the highway infrastructure, Mackenzie County and Paddle Prairie Metis Settlement were joined with the areas of the other three municipalities in Lesser Slave Lake with high Indigenous populations to form Mackenzie. The Commission has no hesitation in granting Mackenzie the protection of Section 15(2) of the Act (while it had significant reservations in granting the same to Central Peace-Notley). Concerns regarding population and road infrastructure had cascading consequences on Lac Ste. Anne-Parkland and, to a lesser extent, Grande Prairie-Wapiti, both of which lead to effective representation. These changes were facilitated by making West Yellowhead a more northern-oriented electoral division.

In the result, the electoral division of Peace River-Notley represents the Peace River corridor with a population significantly below the provincial average but not approaching 50% below the provincial average. The communities in common in the area will lead to effective representation.

Geographically, Mackenzie represents the largest electoral division in the province, but also the one with by far the smallest population. It has a significant Indigenous population. The Commission acknowledges that the distribution of the Indigenous population in Alberta renders it challenging to draw an electoral division with a majority Indigenous population. The Commission nonetheless hopes that this electoral division can be a vehicle for an Indigenous voice in the Legislature. We also specifically seek feedback from Indigenous Albertans concerning this electoral division's boundaries and its name. We are of the view that effective representation will logically follow in this area.

Even under the new maps, the electoral divisions in this area of the province have by far the highest average variances from the provincial average of any region in the province. Even with the redistribution, the North and Near-north of the province contain almost all electoral divisions with the largest variances from average provincial population. Drumheller-Stettler is the only electoral division with a population variance greater than those of Fort McMurray-Lac La Biche, Fort McMurray-Wood Buffalo, and Slave Lake-Westlock-Athabasca. Airdrie-West is the only other electoral division with a population lower than Peace River-Notley. Vermilion-Lloydminster-Wainwright is the only other

electoral division with a population lower than West Yellowhead. In other words, when Mackenzie's special status is also considered, electoral divisions in this region represent six of the nine with the lowest populations in the province, including four of the lowest five and five of the lowest seven.

We acknowledge that three electoral divisions in the far northwest of the province have essentially been reduced to two-and-a-third. Slave Lake-Westlock-Athabasca and West Yellowhead becoming more northern in their orientation only partially compensate for this. The Commission's view is that this is an imperfect solution to an impossible problem. But we consider this the best way to divide Alberta into 89 electoral divisions to achieve effective representation for all Albertans.

The Commission also notes that, unlike Saskatchewan (see *The Constituency Boundaries Act, 1993*, SS 1993, s. 2(e)(1)), Manitoba (see *The Electoral Divisions Act*, CCSM c. E40, s. 11(3)(b)), Ontario (*Electoral Boundaries Act, 2015*, SO 2015, c. 31, s. 2(1)), or Newfoundland and Labrador (*Electoral Boundaries Act*, RSNL 1990, c. E-4, s. 15(6)), the concept of "Northern Alberta" is more organic than legal. Almost all of the province is accessible by car, unlike these other provinces. The population of the far north of Alberta is also not as Indigenous as the far north of these other provinces, each of which have at least one electoral division where the population is majority or at least plurality Indigenous.⁵ The distribution of the Indigenous population in Alberta, coupled with the limitations placed on the Commission by the Act, makes that challenging.

The Commission proposes the boundaries in this area of the province with humility. The Commission is reasonably certain that an electoral division needs to be removed from the North or Near-north given the extensive discussions of many alternatives, all of which did not yield effective representation for Albertans. We nonetheless remain particularly open-minded on *how* to remove an electoral division from this area of the province.

Populations of all electoral divisions and their variances from provincial averages are found in charts in Appendix E.

⁵ This includes but is not necessarily limited to (due to imperfect information available) Cumberland and Athabasca in Saskatchewan; Flin Flon, Keewatinook, Thompson, and The Pas-Kameesak in Manitoba; Kiiwetinoong in Ontario; and Torngat Mountains in Labrador.

IX. Naming Recommendations

The Commission has the statutory authority and obligation to recommend name changes to electoral divisions. The Commission is of the view that names that are based in geography that avoid even a hint of partisanship are best practice to ensure faith in the electoral system and democracy. The Commission is further of the view that names should be as clear and concise as reasonable. The Commission also considers it appropriate for the largest municipality within an electoral division to be listed first in an electoral division's name. The Commission nonetheless is of the view that names should reflect the *status quo*, unless geographical areas have been removed from a constituency, with limited exceptions that will be explained. Accordingly, name changes are very modest, and only 18 existing electoral divisions are recommended for name changes. This is in addition to five new electoral divisions and three electoral divisions where name changes are required due to consolidation.

This Commission's preference is to preserve the *status quo* with respect to name changes, so it is not recommending changes to the names of electoral divisions currently named after deceased politicians. The Commission nonetheless discourages naming new electoral divisions after politicians. Without question, there are politicians who should be honoured by Alberta. But when an electoral division is named after a politician, it risks sending a signal, however subtle, of support for that politician's political party. Moreover, there are a finite number of electoral divisions but an infinite number of ways to honour a politician. Naming electoral divisions after a politician risks questions about why a particular politician was honoured. Again, however, the Commission favours maintaining the *status quo* if possible. Accordingly, the Commission is not recommending changes to names of electoral divisions currently named after politicians.

In a slight exception to the preservation of the *status quo* respecting names, the Commission is recommending the largest municipality within an electoral division be named first within that electoral division's name. Accordingly, it is recommended that "Medicine Hat" go before "Brooks" or "Cypress" in the names of those two electoral divisions. Medicine Hat is otherwise the only city of its size in Alberta that does not appear at the beginning of an electoral division's name, and it cannot be found on an alphabetical list of electoral divisions. Similarly, it is recommended that "Innisfail-Sylvan Lake" be renamed "Sylvan Lake-Innisfail."

X. Recommendations for Boundary Changes

Having explained the rationales for the electoral divisions from the perspective of the province, the remainder of this report will provide a rationale for the boundaries for each of the 89 electoral divisions, listed numerically by map number. The maps are numbered in accordance with Elections Alberta's practice: every electoral division with "Calgary" at the beginning of its name is numbered 1-29 in alphabetical order, followed by every electoral division with "Edmonton" at the beginning of its name being numbered 30-50 in alphabetical order, and finally, the remaining electoral divisions are numbered 51-89 in alphabetical order.

If an electoral division's borders have not changed at all, we note that with an asterisk.* There are 9 of them.

Where an existing electoral division's name is recommended for change, we place the previous name in parentheses beside the newly recommended name. There are 16 of them.

New electoral divisions are denoted with a dagger.† There are five of them.

Electoral divisions that are consolidations resulting in the removal of an electoral division from an area have the previous electoral divisions' names in square brackets beside them. There are three of them. These last two changes reflect the net increase of two electoral divisions in the Legislature.

Calgary

The 2017 Commission created 26 electoral divisions in Calgary. We propose to make that 28 with boundaries mostly in Calgary (though two share areas with what is adjacent to the city). Moreover, Calgary-Okotoks is proposed as an additional "0.3" of an electoral division for Calgary.

Calgary-Acadia

It is recommended that the boundaries of the electoral division of Calgary-Acadia be as shown on Map 1, resulting in a population of 57,620.

Significant changes are recommended to this electoral division. This is partially required due to the creation of Calgary-Confluence. One of two new electoral divisions in Calgary, it is recommended that all parts of Calgary-Acadia north of Glenmore Trail be moved to Calgary-Confluence. It is also recommended that the area east of Elbow Drive, north of Heritage Drive, west of Macleod Trail, and south of Glenmore Trail be moved to Calgary-Glenmore, to increase the population of Calgary-Glenmore and bring together communities just south of Glenmore Trail.

In order to increase Calgary-Acadia's population, it is accordingly further recommended that areas north of Canyon Meadows Drive, east of Macleod Trail, south of Anderson Road, and west of Bow Bottom Trail be moved from Calgary-Fish Creek to Calgary-Acadia. These areas share significant service centres and infrastructure with neighbourhoods to their north and west already in Calgary-Acadia. Moreover, this is required to balance populations further south in Calgary.

The proposed electoral division continues to be based around the Acadia community. It has clear boundaries and communities in common. Though its population is slightly above the provincial average, this hardly warrants justification. To the extent that it does, it can be justified because less growth is expected in this area compared to surrounding areas in Calgary and the boundaries are clear.

Calgary-Beddington

It is recommended that the boundaries of the electoral division of Calgary-Beddington be as shown on Map 2, resulting in a population of 56,024.

Two discrete changes are proposed from the previous boundaries of the electoral division. First, for reasons noted in the discussion of Calgary-Edgemont, it is recommended that areas in the current Calgary-Edgemont north of Country Hills Boulevard NW be moved to Calgary-Beddington. Second, for reasons noted in the discussion of Calgary-Nose Creek, it is recommended that areas in the current Calgary-Beddington north and east of Beddington Trail be moved to Calgary-Nose Creek. This is very similar to the current boundaries, boundaries praised by MLA Amanda Chapman.

Both of these changes result in electoral divisions in Northwest Calgary, including Calgary-Beddington, having very similar populations, logical boundaries that are major thoroughfares, and communities with common service centres within the electoral division.

Calgary-Bhullar-McCall

It is recommended that the boundaries of the electoral division of Calgary-Bhullar-McCall be as shown on Map 3, resulting in a population of 60,835. This is a rapidly growing area of the city, necessitating a change with respect to Calgary-Falconridge: areas west of Falconridge Boulevard NE, south of 80 Avenue NE, and east of 36 Street NE are recommended for addition to Calgary-Falconridge, to better balance the populations between the electoral division. Otherwise, the population of Calgary-Bhullar-McCall would be unreasonably large.

It is also recommended that a border between Calgary-Bhullar-McCall and Calgary-North East be moved from Metis Trail NE to a straight line extending south between Country Hills Boulevard and 96 Avenue, connecting 60 Street NE. This decreases the population of Calgary-North East in a way that is justified given the expected population growth in Calgary-North East.

The Commission is of the view that the population variance is justified, given that it is nowhere close to the statutory or constitutional limit, the electoral division can be effectively represented, and the rate of growth is expected to slow.

Calgary-Bow

It is recommended that the boundaries of the electoral division of Calgary-Bow be as shown on Map 4, resulting in a population of 54,981.

This recommended electoral division's boundaries have one discrete change from its current boundaries: areas previously in the electoral division north of the Bow River are proposed to be moved to Calgary-Varsity. This results in both electoral divisions having populations close to the provincial average, and it makes sense for all of Calgary-Bow to be south of the river.

Calgary-Buffalo

It is recommended that the boundaries of the electoral division of Calgary-Buffalo be as shown on Map 5, resulting in a population of 54,243. This recommended electoral division is small geographically, but it reflects the density in this area of the city. The recommended electoral division is drawn entirely from the previous electoral division bearing the same name, but it is smaller and has simpler lines: the Bow River to the north, 1 Street SE to the east, 17 Avenue to the south, and 14 Street SW to the west. Areas previously in the electoral division are moved to the new electoral division of Calgary-

Confluence. The shared interests and clear boundaries of this very urban seat justify the extremely modest variance from the average population, advocated for by Jaret Hargreaves. The reduction in geographical size is necessary considering what was previously the very high population.

Calgary-Confluence[†]

It is recommended that the boundaries of the electoral division of Calgary-Confluence be as shown on Map 6, resulting in a population of 56,902. With the Bow River and Deerfoot Trail running through its centre, this new electoral division takes its name from the Confluence Historic Site and Parkland. It unites both sides of the river in an electoral division that has a population modestly above the provincial average, and has travel routes and service centres that constituents would avail themselves of throughout the electoral division. Effective representation can follow for this new electoral division, which is mostly drawn from many neighbouring electoral divisions.

Calgary-Cross

It is recommended that the boundaries of the electoral division of Calgary-Cross be as shown on Map 7, resulting in a population of 55,617. This electoral division's boundaries have shifted notably, but discretely, in four ways. First, all areas in the electoral division south of 16 Avenue are recommended for removal to Calgary-East. This balances population and makes 16 Avenue a consistent border between the two electoral divisions. Second, it is recommended that this electoral division include areas north of 32 Avenue NE, south of McKnight Boulevard NE, west of 68 Street NE, and east of 36 Street NE, currently in Calgary-Falconridge. This increases the population of Calgary-Cross and makes its borders generally clearer. Third, it is nonetheless recommended that areas north of 32 Avenue NE, south of McKnight Boulevard NE, west of the city limits, and east of 68 Street NE, be moved to Calgary-Falconridge, to better balance the population between the electoral divisions.

Finally, it is recommended that the Hamlet of Conrich—portions of Rocky View County west and north of the City of Chestermere but south and west of Range Road 283 and Township Road 250—be included into this electoral division. This community of Conrich is more connected in terms of many services with Calgary than either Chestermere or Airdrie. This community's inclusion in Calgary-Cross better balances the population between Calgary-Cross and Chestermere-Strathmore. Submissions asked for this change, citing Conrich's potential annexation by Calgary in the near future. The Commission was persuaded by such public submissions, including from Soha Ahmad, who wrote, "While it's technically part of Rocky View County, in reality, Conrich feels like part of Calgary's outer edge. The community is just minutes away from the city, if you didn't know the municipal boundary was there, you'd probably assume it was already part of Calgary."

The population of this electoral division is very modestly above the provincial average. Given its relatively compact size and the commonalities within the electoral division, this variance is justified.

Calgary-Currie*

It is recommended that the boundaries of the electoral division of Calgary-Currie be as shown on Map 8, resulting in a population of 58,111. This recommended electoral division's boundaries are unchanged. This reflects the fact that this electoral division makes sense due to common transportation routes and roadways. This is a good example of where the Commission elects to maintain the *status quo* in the absence of a compelling reason to depart from it, especially given the modest variance from the average population being justified given the electoral division's compactness and the preference to preserve the *status quo*.

Calgary-East

It is recommended that the boundaries of the electoral division of Calgary-East be as shown on Map 9, resulting in a population of 57,359.

Changes are recommended from the current boundaries of Calgary-East. All areas south of 17 Avenue/Highway 1A are moved to Calgary-Peigan or Calgary-Confluence as part of the creation of Calgary-Confluence. The electoral division has also gained areas from Calgary-Cross north of Memorial Drive, south of 16 Avenue NE, and east of 36 Street. These diverse areas make sense in Calgary-East, to which they are connected via major roads. They also make the population of Calgary-East more balanced with those of neighbouring electoral divisions. Moreover, all of these changes result in a rectangular electoral division with borders easy to describe: 17 Ave/Highway 1A on the South, 36 Street on the West, 16 Avenue NE on the North, and the city borders on the East.

This electoral division's population is modestly above the provincial average, but that is eminently justifiable given its compact geographic size and the logic of its borders.

Calgary-Edgemont

It is recommended that the boundaries of the electoral division of Calgary-Edgemont be as shown on Map 10, resulting in a population of 55,141.

Two discrete changes from the current boundaries of the electoral division are proposed. First, as noted below in the discussion of Calgary-Foothills, it is recommended that this electoral division's western boundary be Stoney Trail NW instead of Nose Hill Drive NW. Second, it is recommended that areas in Calgary-Edgemont north of Country Hills Boulevard NW be moved to Calgary-Beddington.

Both of these changes contribute to all electoral divisions in Northwest Calgary having very similar populations. In the case of Calgary-Edgemont in particular, it has the further advantage of the electoral division having clearer boundaries, with major roadways on all sides: Shaganappi Trail NW on the East, Country Hills Boulevard NW on the North, Stoney Trail NW on the West, and Crowchild Trail NW on the South. This fulfills the statutory goal of having clear boundaries, in addition to the goals of keeping communities in common and similar populations together.

These modest changes to the electoral division's boundaries are also consistent with MLA Julia Hayter's submission to keep the electoral division mostly in its current form.

Calgary-Elbow

It is recommended that the boundaries of the electoral division of Calgary-Elbow be as shown on Map 11, resulting in a population of 55,141. This recommended electoral division's boundaries are largely unchanged. The notable exception is the removal of a discrete area south of Glenmore Trail SW, which is recommended for addition to Calgary-Glenmore. This small area bears more in common, from a service and infrastructure perspective, with Calgary-Glenmore. Moreover, the new proposed boundaries are easier to understand, with Glenmore Trail representing a consistent boundary across the south end of the electoral division.

Apart from this small change, the recommended boundaries reflect the desire for relative continuity with the *status quo* and the fact that this electoral division makes sense due to common transportation routes and roadways. The *status quo* is generally supported by submissions such as those from Frank Frey. The exceptionally modest variance from the average population does not require justification.

Calgary-Falconridge

It is recommended that the boundaries of the electoral division of Calgary-Falconridge be as shown on Map 12, resulting in a population of 56,052. For reasons noted in the discussion of Calgary-Cross, it is recommended that the following areas be exchanged between Calgary-Falconridge and Calgary-Cross:

- Areas north of 32 Avenue NE, south of McKnight Boulevard NE, west of 68 Street NE, and east of 36 St NE: move to Calgary-Cross from Calgary-Falconridge; and
- Areas north of 32 Avenue NE, south of McKnight Boulevard NE, west of the city limits, east of 68 St NE: move to Calgary-Falconridge from Calgary-Cross.

As noted above in the discussion of Calgary-Cross, this keeps areas in common together and better balances population.

It is further recommended that areas west of Falconridge Boulevard NE, south of 80 Avenue NE, and east of 36 St NE, also be added to the electoral division from Calgary-Bhullar-McCall. These areas are linked to the neighbourhoods immediately to their south in terms of service centres and roads. Moreover, this change is necessary to better balance the population between Calgary-Falconridge and Calgary-Bhullar-McCall.

Calgary-Fish Creek

It is recommended that the boundaries of the electoral division of Calgary-Fish Creek be as shown on Map 13, resulting in a population of 60,044.

Significant changes have been proposed to this electoral division as a result of the changes required to Calgary-Acadia, which were necessitated by the creation of Calgary-Confluence. As noted above, it is recommended that areas north of Canyon Meadows Drive, east of Macleod Trail, south of Anderson Road, and west of Bow Bottom Trail be moved from Calgary-Fish Creek to Calgary-Acadia. This is recommended for reasons of population and connecting service centres.

It is accordingly recommended, to increase Calgary-Fish Creek's population, that the following areas be added:

- a) From Calgary-Lougheed: areas north of Shawnessy Boulevard SW, following James McKevitt Road North until it cuts across green space to Fish Creek Boulevard SW; and
- b) From Calgary-Shaw: areas north of 194 Avenue, east of Macleod Trail, south of Spruce Meadows Trail, and west of Chapparral Boulevard SE.

All of these areas are suburban neighbourhoods that share service centres and are easily traversable by car.

We are confident that the new Calgary-Fish Creek is an electoral division for which an MLA can achieve effective representation. Though the variance from provincial average is relatively large, it remains well within the statutory and constitutional limits and is warranted given the other changes within Calgary. Unlike some neighbouring electoral divisions, significant growth is not expected in Calgary-Fish Creek.

The Commission notes that this is one of seven electoral divisions that will be affected should Okotoks-Diamond Valley be created rather than Calgary-Okotoks. Its population would be increased to 61,935, as it would absorb more territory further south as seen on Map 13B.

Calgary-Foothills

It is recommended that the boundaries of the electoral division of Calgary-Foothills be as shown on Map 14, resulting in a population of 54,797.

This proposed electoral division is mostly unchanged from the previous boundaries, with two exceptions. Both of these areas are recommended for removal given significant expected growth in Calgary-Foothills. First, as noted in the discussion of Calgary-North, it is recommended that the eastern boundary, north of Symons Valley Parkway, be moved from Evanspark Boulevard NW/Panorama Road NW to the West Nose Creek Ravine/Symons Valley Road NW. Second, it is recommended that areas to the south of Country Hills Boulevard NW be moved to Calgary-Edgemont. This change connects these areas to service centres within Calgary-Edgemont and makes Country Hills Boulevard NW a consistent boundary on Calgary-Edgemont's north.

This proposed electoral division's population is very modestly below the provincial average. This hardly warrants justification but, if it did, would be justified due to expected growth in the electoral division and submissions such as those from resident Olga Barcelo, expressing contentment with the current boundaries. Reducing the size of the electoral division will only facilitate effective representation.

Calgary-Glenmore

It is recommended that the boundaries of the electoral division of Calgary-Glenmore be as shown on Map 15, resulting in a population of 56,917.

This recommended electoral division's boundaries are unchanged, but for two additions. The first is a discrete area south of Glenmore Trail SW, which is recommended for removal from Calgary-Elbow. This small area bears more in common, from a service and infrastructure perspective, with Calgary-Glenmore. Moreover, the new proposed boundaries are easier to understand, with Glenmore Trail representing a consistent boundary across the north end of the electoral division. The second addition is the area east of Elbow Drive, north of Heritage Drive, west of Macleod Trail, and south of Glenmore Trail, which is recommended for addition from Calgary-Acadia, to reduce the population of Calgary-Acadia, and bring together communities just south of Glenmore Trail.

This proposed electoral division continues to be based around the Glenmore Reservoir, with service and population centres on the north, east, and south sides of the reservoir. It brings together communities with commonalities. Its modestly exceeding the provincial average population hardly warrants justification but, to the extent that it does, it can be justified due to lower-than-average anticipated population growth compared to the rest of Calgary, and the other advantages of the proposed and clear boundaries.

These boundaries were well supported by present residents, such as Marcia Cormier, Rob Cormier, and Jayne Martin. As David Galasso wrote in his submission:

Calgary-Glenmore riding boundaries currently reflect the demographic[s] of this riding extremely well. We are a riding that is not quite suburban, and not really inner city and certainly not rural. We are firmly placed on the SouthWestern edge of Calgary with all the requirements and concerns of a riding located in a big city. My preference would be to keep the boundaries as they are . . .

In a similar vein, Marg Semel wrote, "The Jewish Community in Calgary Glenmore share common interests and need to stay together for their voice to be heard and represented. The [electoral division]

offers that connection and engagement.” Jayne Martin and Adam Singer expressed similar sentiments. We find these submissions persuasive.

Calgary-Hays

It is recommended that the boundaries of the electoral division of Calgary-Hays be as shown on Map 16, resulting in a population of 52,111.

The proposed boundaries of Calgary-Hays essentially map the current boundaries, with the exception of areas west of Deerfoot Trail being moved to Calgary-Peigan. It is recommended that these areas be removed from Calgary-Hays to better balance the population between Calgary-Peigan and Calgary-Hays. Though the territory may seem modest, development is very possible in the eastern part of Calgary-Hays in the coming years, further justifying this boundary change.

The Commission is extremely satisfied that the proposed boundaries of Calgary-Hays make for an electoral division that can be effectively represented. Essentially, they make the current Calgary-Hays, which had boundaries lauded by a submission from Lawrence Alexander, slightly smaller, which can only increase effective representation. The variance from average population is quite small. To the extent it needs justification, expected development on the east end of Calgary-Hays, as well as the advantages of the rectangular borders, provides that justification.

Calgary-Klein

It is recommended that the boundaries of the electoral division of Calgary-Klein be as shown on Map 17, resulting in a population of 49,666. This is largely based on the previous boundaries of Calgary-Klein, with two exceptions. First, areas east of the Deerfoot Trail and south of 16 Avenue are recommended to be moved to the new electoral division of Calgary-Confluence, as part of the creation of this additional electoral division in Calgary. This reflects 16 Avenue being a major dividing line in this part of Calgary. Second, areas north of 16 Avenue, between 10 Street NW and 2 Street NW, are recommended to be added from Calgary-Mountain View. It is recommended that these areas be moved to Calgary-Klein because they bear similarities to Calgary-Klein in terms of housing, and to increase Calgary-Klein's population.

This electoral division's 9.6% negative variance from the provincial average is relatively large in the context of Calgary. But the electoral division has been effectively represented in the past, and the proposed changes are likely to increase that. It must be underscored that perfect parity between electoral divisions is not possible and this electoral division's comparatively modest population is to some extent the consequence of the recommended map of Calgary making sense as a whole. The same is true of Edmonton-Highlands-Norwood in Edmonton.

Calgary-Lougheed

It is recommended that the boundaries of the electoral division of Calgary-Lougheed be as shown on Map 18, resulting in a population of 52,241. Due to the changes in Calgary-Fish Creek, two changes are proposed to Calgary-Lougheed. First, areas north of Shawnessy Boulevard SW, following James McKevitt Road North until it cuts across green space to Fish Creek Boulevard SW, are recommended for removal to Calgary-Fish Creek. These changes increase Calgary-Fish Creek's population. Second, to compensate for the foregoing, areas north of Stoney Trail SE, east of James McKevitt Road, south of Shawnessy Boulevard, and west of Macleod Trail are recommended for removal from Calgary-Shaw and addition to Calgary-Lougheed. These areas include service centres, infrastructure, and roads already connected to and in Calgary-Lougheed.

These changes make Calgary-Lougheed a more cohesive electoral division in terms of included neighbourhoods. They further make Calgary-Lougheed's borders a rough rectangle in the southwest corner of the city and easy to explain. The relatively low population is justified given potential growth.

The Commission notes that this is one of seven electoral divisions that will be affected should Okotoks-Diamond Valley be created rather than Calgary-Okotoks. Its population would be increased to 59,554, but its borders would remain a rough rectangle in the southwest of Calgary as seen on Map 18B.

Calgary-Mountain View

It is recommended that the boundaries of the electoral division of Calgary-Mountain View be as shown on Map 19, resulting in a population of 54,396. This recommended electoral division's boundaries are mostly unchanged. The only modest recommended changes are the exclusion of areas north of 16 Avenue, between 10 Street NW and 2 Street NW. It is recommended that these areas be moved to Calgary-Klein. Not only are residents in these areas often more likely to seek services in Calgary-Klein; this move is necessary to increase the population of Calgary-Klein, which would otherwise become unreasonably low in the context of the city.

This electoral division will be a conduit for effective representation. The current boundaries provide for effective representation. The slight reduction in size will only increase that.

Calgary-North

It is recommended that the boundaries of the electoral division of Calgary-North be as shown on Map 20, resulting in a population of 57,945.

This proposed electoral division is modestly changed from the previous boundaries, with two exceptions. First, it is recommended that the western boundary, north of Symons Valley Parkway NW, be moved from Evanspark Boulevard NW/Panorama Road NW to Symons Valley Road NW/West Nose Creek Ravine. This has three advantages. First, it creates a clear boundary for Calgary-North. Second, it unites communities east of the geographic barrier that is the West Nose Creek Ravine. Third, it reduces the population in Calgary-Foothills, where significant growth is expected.

Second, to reduce Calgary-North's population in light of that change, and for further reasons noted below in the discussion of Calgary-Nose Creek, it is recommended that areas north of Stony Trail and east of 14 Street NW be moved into Calgary-Nose Creek. This also creates clearer borders and reduces Calgary-North's population, in addition to being necessary to create Calgary-Nose Creek.

As a result, this proposed electoral division has a population modestly above the provincial average, but that is justifiable given its compact urban nature and the communities of interest it unites.

Calgary-North East

It is recommended that the boundaries of the electoral division of Calgary-North East be as shown on Map 21, resulting in a population of 54,541.

This area of the city has grown rapidly, and this is expected to continue. This requires two changes to the electoral division's boundaries. First, it is recommended that a border with Calgary-Bhullar-McCall be moved from Metis Trail NE to a straight line extending south between Country Hills Boulevard and 96 Avenue, connecting 60 St NE, for reasons noted above in the discussion of Calgary-Bhullar-McCall. Second, all parts of the electoral division west of Deerfoot Trail are recommended to be moved

to the new electoral division of Calgary-Nose Creek. The Deerfoot Trail is a major north-south corridor, and is accordingly a logical boundary.

Though these changes leave Calgary-North East's population modestly below the provincial average, this is justifiable given the expected growth in this area of Calgary.

Calgary-North West*

It is recommended that the boundaries of the electoral division of Calgary-North West be as shown on Map 22, resulting in a population of 52,488.

This recommended electoral division's boundaries are unchanged. This reflects anticipated population growth, and the fact that this electoral division makes sense due to common transportation routes and roadways. This is a good example of where the Commission elects to maintain the *status quo* in the absence of a compelling reason to depart from it, especially given the very modest variance from the average population, and the rationales for other electoral divisions in Northwest Calgary.

Calgary-Nose Creek†

It is recommended that the boundaries of the new electoral division of Calgary-Nose Creek be as shown on Map 23, resulting in a population of 55,155.

This electoral division's boundaries are overwhelmingly taken from the previous boundaries of Calgary-North East, as suggested by MLA Gurinder Brar: all parts of that electoral division west of the Deerfoot Trail are proposed to be in this electoral division. It is also proposed that the portions of Calgary-Beddington north and east of Beddington Trail be moved to Calgary-Nose Creek. Not only does this modest change further equalize populations in this area of Calgary; it connects these communities to the electoral division in terms of existing transportation routes and where residents often receive services. Finally, it is recommended that areas north of Stony Trail and east of 14 Street, that were previously in Calgary-North, be moved into Calgary-Nose Creek. This connects the communities further north in Calgary-Nose Creek with neighbourhoods elsewhere in the electoral division. It further helps equalize the populations between Calgary-Nose Creek and Calgary-North. Otherwise, the population in Calgary-North may become unreasonably high.

Ultimately, this proposed electoral division has clear and easy-to-understand boundaries, linking communities with significant commonalities. The population is very modestly above the provincial average. The Commission thanks Ronald Yule for his recommendation regarding naming an electoral division after the Nose Creek.

Calgary-Okotoks (Highwood)

It is recommended that the boundaries of the electoral division of Calgary-Okotoks be as shown on Map 24, resulting in a population of 58,327.

Though a successor to the electoral division of Highwood, this is a very different electoral division. It consists of portions of Highwood: 1) in Foothills County, north of 338 Avenue, east of 48 Street West, south of the City of Calgary and the Bow River, and west of 272 Street East; and 2) the Town of Okotoks. It also consists of portions of Calgary south of Spruce Meadows Trail and west of Macleod Trail (previously in Calgary-Shaw).

Unlike the other three hybrid electoral divisions containing parts of Calgary and Edmonton, all of which were the subject of recommendations, there were no submissions that supported this link

between Calgary and Okotoks. But the Commission is of the opinion that this electoral division will enable effective representation and assist in facilitating effective representation in neighbouring electoral divisions. The Town of Okotoks is the largest town in Alberta. Like Calgary, it is a fundamentally urban area. This enables Okotoks and the portions of Foothills County in the electoral division to be in a much geographically smaller electoral division than would otherwise be the case. Perhaps most importantly, this allows all other electoral divisions in Southern Calgary (Calgary-Lougheed, Calgary-Fish Creek, Calgary-Shaw, and Calgary-South East) to have smaller, more balanced populations and clearer borders.

In other words, this electoral division will not only facilitate effective representation in itself, but it will also enable effective representation in surrounding electoral divisions.

In the alternative, the Commission would recommend that the electoral division of Okotoks-Diamond Valley be as shown on Map 24B, resulting in a population of 52,177. This electoral division would link portions of Foothills County south of the border with Banff-Jasper and north of Highway 7 (between Okotoks and Diamond Valley) and the Sheep River (in the west end of the electoral division), including the Towns of Okotoks and Diamond Valley, in addition to the parts of Foothills County already recommended for inclusion in Calgary-Okotoks. This electoral division would also be a vehicle for effective representation. It would also enable reduction of the populations of High River-Vulcan and Livingstone-Macleod, facilitating effective representation. It would, however, increase the population variance between the electoral divisions in Calgary and the rural south of Alberta. It would also result in less clear borders within Calgary. The Commission is curious about public feedback.

Calgary-Peigan

It is recommended that the boundaries of the electoral division of Calgary-Peigan be as shown on Map 25, resulting in a population of 58,546. These proposed boundaries bear significant similarities to the present boundaries of Calgary-Peigan, with some exceptions. First, it is recommended that areas west of Deerfoot Trail and south of Mt McKenzie Way/McKenzie Lake Boulevard be moved to Calgary-Peigan from Calgary-Hays. As noted above, this is necessary to reduce the population of Calgary-Hays. Moreover, these neighbourhoods bear much in common with the areas to their north already in Calgary-Peigan. Second, it is recommended that areas west of 36 Street SE, but north of Peigan Trail, be moved into Calgary-Confluence. From an infrastructure and service perspective, these neighbourhoods have similarities with Calgary-Confluence, and Calgary-Confluence's creation requires territory from several neighbouring electoral divisions. Third, it is recommended that all areas in Calgary-East south of 17 Avenue be moved to Calgary-Peigan (with the exception of those north of 26 Avenue and west of 48 Street, which are recommended for inclusion in Calgary-Confluence). These changes balance the populations between Calgary-Peigan, Calgary-Confluence, and Calgary-East, and make the borders of Calgary-East, in particular, very easy to describe.

In sum, an MLA will be able to effectively represent Calgary-Peigan, a group of communities just east of the Bow River extending to Calgary's industrial east. Presenter Lorraine Robinson provided a compelling submission urging the Commission to keep the constituency largely intact, in particular keeping the community of Ogden. The proposed variance from the provincial average is modest in the context of Calgary and keeps communities of interest together, enabling effective representation.

Calgary-Shaw

It is recommended that the boundaries of the electoral division of Calgary-Shaw be as shown on Map 26, resulting in a population of 57,612. Significant changes were required to Calgary-Shaw, due to the changes to Calgary-Fish Creek and Calgary-Lougheed explained above, and changes to Calgary-South

East, explained below. This required extending Calgary-Shaw to the areas east of the Bow River that are south of Stoney Trail and west of Deerfoot Trail. These changes are further recommended because, as discussed in more detail below, if Calgary-Shaw did not take this territory from Calgary-South East, the population of Calgary-South East would be unreasonably large. Meanwhile, west of the Bow River, Calgary-Shaw is now confined to areas south of Stoney Trail, and east of Macleod Trail. All areas in the electoral division west of Macleod Trail are recommended for inclusion in Calgary-Okotoks or Calgary-Lougheed. Areas north of 194 Avenue, east of Macleod Trail, south of Spruce Meadows Trail, and west of Chapparal Boulevard SE are also recommended to be added to Calgary-Fish Creek.

The Commission was reluctant to have an electoral division in Calgary cross the Bow River but concluded that it was necessary for one to do so. But this will not seriously impede effective representation. Residents have two bridges to cross the river in the electoral division, and the electoral division represents a polygon in the south of Calgary, mostly bordered by the city limits on the South, Macleod Trail and Chapparal Trail on the West, Stoney Trail and 194 Avenue on the North, and Deerfoot Trail on the East. The population is well within the effective representation range. The population variance is justifiable given the communities of interest brought together and the clear borders.

The Commission notes that this is one of seven electoral divisions that will be affected should Okotoks-Diamond Valley be created rather than Calgary-Okotoks. Its population would be increased to 58,018, as its borders will shift further west and further south as seen on Map 26B. There are clear disadvantages to this map in terms of lack of a bridge crossing the river, and less clear boundaries. But effective representation would still be possible.

Calgary-South East

It is recommended that the boundaries of the electoral division of Calgary-South East be as shown on Map 27, resulting in a population of 53,551.

The proposed boundaries of Calgary-South East essentially map the current boundaries, with the exception of areas north and west of Deerfoot Trail being moved to Calgary-Shaw. It is recommended that these areas be removed from Calgary-South East for two reasons. First, the creation of Calgary-Confluence had effects on the boundaries of Calgary-Acadia, which in turn had effects on the boundaries of Calgary-Fish Creek, which in turn had effects on the boundaries of Calgary-Lougheed. All of these proposed boundaries are justified for reasons noted elsewhere, but it required Calgary-Shaw to extend east of the Bow River, for reasons also explained above.

Second, it was logical for Calgary-Shaw to take territory from Calgary-South East given the significant population growth in Calgary-South East. Losing this territory was necessary or else Calgary-South East's population would have been unreasonably high.

The boundaries of Calgary-South East are clear and rectangular: the city borders on the South and East, Deerfoot Trail on the West, and Stoney Trail on the North.

The Commission is satisfied that the proposed boundaries of Calgary-South East make for an electoral division that can be effectively represented. Essentially, they make the current Calgary-South East slightly smaller, which can only increase effective representation. The slightly below average population is eminently justifiable given growth potential and the clearness of the boundaries.

The Commission notes that this is one of seven electoral divisions that will be affected should Okotoks-Diamond Valley be created rather than Calgary-Okotoks. Its population would be increased to 60,417 people, as its borders would encompass areas west of Deerfoot Trail as shown on Map 27B.

Calgary-Varsity

It is recommended that the boundaries of the electoral division of Calgary-Varsity be as shown on Map 28, resulting in a population of 57,166. This recommended electoral division's boundaries are unchanged from its current boundaries with one exception: areas north of the Bow River previously in Calgary-Bow are recommended for transfer into Calgary-Varsity. This keeps both electoral divisions closer to provincial averages in terms of population, and, in any event, it makes sense for both electoral divisions to not be on both sides of the river. Moreover, this electoral division makes sense due to common transportation routes and being centred around the University of Calgary. The modest variance from average population hardly warrants justification but, to the extent that it does, it can be justified due to lower-than-average anticipated population growth in this urban electoral division, as well as the clear boundaries and the preference for boundaries close to the *status quo*.

Calgary-West-Elbow Valley (Calgary-West)

It is recommended that the boundaries of the electoral division of Calgary-West-Elbow Valley be as shown on Map 29, resulting in a population of 54,167. This is extremely close to the provincial average, and we anticipate that there will be growth in this electoral division. It has the same boundaries as the current boundaries, with the exception of the rural portions that have been added to it: east of Highway 22, south of the Elbow River, west of the City of Calgary boundaries and north of the Tsuu T'ina First Nation's northern boundary. Adding these rural portions is justified for four reasons. First, the rural portions of the electoral division are predominantly acreages in the Elbow Valley neighbourhood that, in terms of service centres, are linked to Calgary much more than to Canmore or Cochrane in neighbouring electoral divisions. Second, adding these rural portions brings Calgary-West-Elbow Valley's population closer to the provincial average. Third, this is an introduction to the concept of hybrid electoral divisions, which is certainly the way of the future. Finally, Sanjeev Kad, on behalf of a local constituency association, explicitly stated that this would be a welcome change, and we received no submissions to the contrary.

Edmonton

After the last Commission, the City of Edmonton had 20 electoral divisions. We recommend that that be increased to 21.

Edmonton-Beverly-Clareview

It is recommended that the boundaries of the electoral division of Edmonton-Beverly-Clareview be as shown on Map 30, resulting in a population of 54,440. Though low for an urban electoral division, this is extremely close to the provincial average and justified given expected development in the new electoral division. MLA Peggy Wright noted that the neighbourhoods in the electoral division share a common history.

This proposed new boundaries bear overwhelming similarity to the previous electoral division bearing the same name, which by all accounts has worked well as a single electoral division, demonstrated in submissions such as those of Lesley Thompson.

The electoral division has lost some territory to Edmonton-Decore, for reasons noted in discussion of that electoral division. Further territory is added from Edmonton-Manning, south and east of 167 Avenue NE and the railway line, as the railway line created an artificial boundary, and to close the gap in population between Edmonton-Manning and Edmonton-Beverly-Clareview. But the fundamental character of the electoral division remains intact.

Edmonton-Castle Downs*

It is recommended that the boundaries of the electoral division of Edmonton-Castle Downs be as shown on Map 31, resulting in a population of 59,612. This electoral division is unchanged from the last redistricting, with borders that reflect the city's northern boundaries as well as major roadways. Constituents congress on the same service centres. This remains well within the 25% variance that is legally permitted, providing another reason to maintain the electoral division in current form. This accorded with MLA Nicole Goehring's submission that the boundaries remain unchanged, despite being above provincial average in population.

Edmonton-City Centre

It is recommended that the boundaries of the electoral division of Edmonton-City Centre be as shown on Map 32, resulting in a population of 54,041.

This bears significant similarities to the current boundaries of Edmonton-City Centre. It has gained area east of 121 Street NW from Edmonton-Glenora. Not only does this make the electoral division closer to the provincial population average, it also reflects the fact that individuals east of the rail line are more likely to travel and receive services east of the rail line. This change also makes the borders between Edmonton-City Centre and Edmonton-Glenora-Riverview clearer. The electoral division lost territory to Edmonton-Highlands-Norwood west of 97 Street NW and north of Princess Elizabeth Avenue NW/118 Avenue NW. These neighbourhoods are likely to seek many services in Edmonton-Highlands-Norwood. Moreover, this transfer was necessary to keep the population of Edmonton-Highlands-Norwood closer to the provincial average.

Ultimately, this electoral division is extremely close in population to the provincial average and remains an electoral division that is extremely close to its current boundaries, boundaries which are praised by MLA David Shepherd.

Edmonton-Decore

It is recommended that the boundaries of the electoral division of Edmonton-Decore be as shown on Map 33, resulting in a population of 58,182. This is very similar to the current boundaries of the electoral division. However, additional territory south of 137 Avenue NW and west of the railway line has been added from Edmonton-Beverly-Clareview, to reflect the fact that significant development is not expected in this electoral division, unlike the neighbouring electoral divisions of Edmonton-Manning and Edmonton-Beverly-Clareview. The additional neighbourhoods added are connected to the new proposed boundaries from an infrastructure perspective, whereas they were separated from the rest of Edmonton-Beverly-Clareview by the rail line.

The population variance from the provincial average is well within the target for effective representation, and the compact size of the electoral division decreases the logistical challenges in representing it.

Edmonton-Ellerslie

It is recommended that the boundaries of the electoral division of Edmonton-Ellerslie be as shown on Map 34, resulting in a population of 53,376. There are significant changes to this electoral division, to assist in the creation of the new electoral division of Edmonton-South East. At its core, the new electoral division of Edmonton-Ellerslie includes areas east of Gateway Boulevard, south of 23 Avenue NW, north of 41 Avenue SW, and west of 66 Street, as well as those north of the Anthony Henday, west of 50 Street NW, south of 23 Avenue NW, and east of 66 Street NW. These are all major

thoroughfares that logically form the boundaries of an electoral division. The electoral division has gained territory from Edmonton-South and Edmonton-Mill Woods to balance populations, prevent an electoral division crossing Gateway Boulevard, and to keep communities of interest in common. It has lost significant territory to create Edmonton-South East. It has also lost some area to Edmonton-Meadows to balance populations and create clearer borders in this area of Edmonton.

The electoral division's borders are a logical polygon in the south of Edmonton, significantly geographically smaller than the current borders of the electoral division. Its slightly lower-than-average population is amply justifiable given expected growth and the challenges in representing the very diverse population.

Edmonton-Glenora-Riverview [Edmonton-Glenora and Edmonton-Riverview]

It is recommended that the boundaries of the electoral division of Edmonton-Glenora-Riverview be as shown on Map 35, resulting in a population of 61,705.

This new electoral division combines the current electoral divisions of Edmonton-Glenora and Edmonton-Riverview, with five notable exceptions:

- 1) All parts of Edmonton-Riverview electoral division south of the North Saskatchewan River, which are logically paired with Edmonton-Strathcona;
- 2) Parts of Edmonton-Glenora east of 121 Street NW, which are logically paired with Edmonton-City Centre;
- 3) Parts of Edmonton-Riverview west of 163 Street NW and north of 95 Avenue NW, which are recommended for addition to Edmonton-West Henday;
- 4) Parts of Edmonton-Glenora west of 156 Street NW, which are recommended for addition to Edmonton-West Henday; and
- 5) Areas of Edmonton-Riverview south and west of Whitemud Drive, 149 Street SW, and 87 Avenue NW (as illustrated on Map 35), which are recommended for inclusion in Edmonton-McClung.

All of these changes create the newly consolidated electoral division of Edmonton-Glenora-Riverview, whose population is well within the legally mandated average. In particular, the new electoral division of Edmonton-Glenora-Riverview combines several inner-city communities north of the North Saskatchewan River, which have common service centres and are centred around roads such as Groat Road, 142 Street NW, and 107 Avenue NW. This electoral division makes sense as a cohesive whole.

The electoral division is easily traversable, and communities share infrastructure and economic interests. It can be effectively represented despite the higher-than-average population.

Edmonton-Gold Bar

It is recommended that the boundaries of the electoral division of Edmonton-Gold Bar be as shown on Map 36, resulting in a population of 54,981.

This is extremely similar to the current boundaries of the electoral division. The only change has been the addition of the neighbourhoods of Ritchie, Hazeldean, and Argyll, by adding areas east of 99 Street NW and south of Whyte Avenue from Edmonton-Strathcona. Though these areas have much in common with Edmonton-Strathcona, they also receive significant services, notably related to public health, in Edmonton-Gold Bar. Moreover, moving these areas from Edmonton-Strathcona to Edmonton-Gold Bar balances the populations between the two electoral divisions. The Commission notes that areas of Edmonton south of the North Saskatchewan River, east of the Whitemud Creek,

and north of Whitemud Drive can be almost perfectly divided to create two electoral divisions with negligible variances from provincial average population and for which effective representation is possible. The Commission therefore recommends making two such electoral divisions.

Edmonton-Highlands-Norwood

It is recommended that the boundaries of the electoral division of Edmonton-Highlands-Norwood be as shown on Map 37, resulting in a population of 49,995.

This is very similar to the current boundaries of this electoral division, boundaries generally supported by submissions such as those of Max Amerongen, Charlayne Bozak, Katherine Joosse, Hans Smits, and Donna Staszewski. One small change is recommended. The area east of 109 Street NW, west of 97 Street NW, south of Yellowhead Trail, and north of Princess Elizabeth Avenue NW/118 Avenue NW has been added to the electoral division, to reflect the fact that many of the individuals who live in this area obtain services in Edmonton-Highlands-Norwood, and to increase the population of Edmonton-Highlands-Norwood compared to Edmonton-City Centre.

This electoral division's population remains relatively low, particularly for an urban electoral division. But, somewhat like Calgary-Klein in Calgary, given the submissions indicating contentment with the current boundaries and the fact that the Commission is content with the other proposed electoral divisions in adjacent areas of Edmonton, the Commission is recommending the continuation of the electoral division with these modest changes. It remains well within the effective representation range.

Edmonton-Manning

It is recommended that the boundaries of the electoral division of Edmonton-Manning be as shown on Map 38, resulting in a population of 59,719. This is very similar to the previous electoral division bearing the same name, which by all accounts has worked well as a similar electoral division. Indeed, local resident Samuel Juru urged maintaining the *status quo* in this regard.

The electoral division has lost some territory south and east of the CN Rail line/167 Avenue NW. This is recommended to reduce this electoral division's population, especially as further development is expected in this area of Edmonton. The railway line in particular is a logical demarcation of where individuals receive services. The smaller size will only increase effective representation in the electoral division, effective representation that was already present.

Given likely population growth, the Commission is particularly curious about the prospect of moving areas of this electoral division that are north of Valour Road to St. Albert-Sturgeon. This would help balance the population of the two electoral divisions in addition to reflecting the fact that these areas of Edmonton bear many similarities to Sturgeon County, and significant urbanization is not expected in the near future.

Edmonton-McClung

It is recommended that the boundaries of the electoral division of Edmonton-McClung be as shown on Map 39, resulting in a population of 61,859.

These boundaries bear significant similarities to the current boundaries of Edmonton-McClung. However, it has gained areas northeast of the Patricia Ravine from Edmonton-Riverview if south and west of the Whitemud Drive, 149 Street SW, and 87 Avenue NW (as illustrated on Map 35), to reduce the population of Edmonton-Glenora-Riverview. It also gained areas northeast of the Anthony Henday Drive and northwest of the North Saskatchewan River, formerly in Edmonton-South West,

both because these areas naturally receive services northeast of the Anthony Henday Drive and to reflect the population increases expected in Edmonton-South West and the new recommended electoral division of Edmonton-West-Enoch. To avoid the population becoming too high in light of these changes, areas north of 87 Avenue NW, west of 170 Street NW, south of 95 Avenue NW, and east of 178 Avenue NW are recommended to be added to Edmonton-West Henday, to better reflect the balance in population between the two electoral divisions.

Ultimately, this electoral division has a higher-than-normal variance from the provincial average, albeit one well within the effective representation range. The communities and neighbourhoods resident within it make sense from a service perspective. It will be a vehicle for effective representation.

Edmonton-Meadows

It is recommended that the boundaries of the electoral division of Edmonton-Meadows be as shown on Map 40, resulting in a population of 53,318. The eastern part of the electoral division remains the same, bordering the city limits until Anthony Henday Drive, and moving north at 17 Street NW. It is recommended that the southwestern edge of the electoral division be moved to 16A Avenue NW and 15 Avenue NW. Though gaining some territory from Edmonton-Ellerslie, this is part of the changes necessary to decrease Edmonton-Ellerslie's population and create Edmonton-South East. It is also recommended that the area south of 23 Avenue further west also be moved to create Edmonton-South East. It is recommended that all areas west of 34 Street but north of 23 Avenue and those north of 38 Avenue even if east of 34 Street (though still west of 17 Street NW) be moved to Edmonton-Mill Woods. This balances population and reflects less growth being expected in Edmonton-Mill Woods.

There has been rapid growth in Edmonton-Meadows. Its smaller geographic size will ensure effective representation. Its smaller than average population is justified given that there remains growth potential. MLA Jasvir Deol spoke eloquently about the challenges of representing this electoral division. We are confident that future MLAs will be able to continue to effectively represent this area.

Edmonton-Mill Woods

It is recommended that the boundaries of the electoral division of Edmonton-Mill Woods be as shown on Map 41, resulting in a population of 59,673. This bears similarity to the current boundaries of the electoral division, particularly on the west (Gateway Boulevard) and north (Whitemud Drive) sides. However, it is recommended that the southern end of the electoral division be moved further north to 23 Avenue NW while the eastern border be moved further east to 34 Street NW. It is also recommended that an area east of 34 Street NW, west of 17 Street NW, and north of 38 Avenue NW be moved into Edmonton-Mill Woods from Edmonton-Meadows.

The reasons for these proposed changes are to make the population closer to neighbouring electoral divisions, bearing in mind the additional electoral divisions being added to south Edmonton. Though this electoral division has the highest population of the four in southeast Edmonton, it is also the one with the least expected growth. Its borders are also clearer as a result of these changes.

Edmonton-Mill Woods still keeps together communities of interest, major roadways, and service centres. The modestly above average population can be justified given the communities of interest kept together, the electoral division's small geography, and the relative lack of anticipated population growth. Effective representation will continue.

Edmonton-North West

It is recommended that the boundaries of the electoral division of Edmonton-North West be as shown on Map 42, resulting in a population of 61,226. These boundaries are very similar to the current boundaries of the electoral division, though it has gained some territory from Edmonton-West Henday, south of 132 Avenue NW, north of Yellowhead Trail, east of 127 Street NW, and west of 113A Street NW. This small change better balances the population between the two electoral divisions, recognizes that these areas bear much in common with Edmonton-North West, and makes the borders between the electoral divisions clearer.

We consider the population variance amply justifiable given that it remains well within the target for effective representation, and multiple submissions indicated widespread contentment with the electoral division in its current form. For instance, local resident Lyndsey Henderson wrote:

I have worked in this constituency for nearly 20 years and feel strongly that the current boundaries should not be massively adjusted. The current boundaries keep the constituency within the logical bounds . . . and ensure that the neighbourhoods represented are well defined as communities of common interest.

Anna Fiddler-Berteig similarly added “Edmonton-North West really makes sense as a constituency.” Brent Bartlett praised the electoral division’s “stronger sense of community and commonality,” asking the Commission to “Please leave this boundary alone.” Rowan Ley wrote of “hope that the Commission will consider leaving the current boundaries of Edmonton-North West mostly unchanged.” And Will van Engan submitted that “The Edmonton-North West riding should remain largely the same as it is now.” (emphasis in original) Finally, MLA David Eggen praised the culture of his electoral division, noting, “Although it’s a bit of a funny shape, there’s a certain coherence in Edmonton-North West.” The minor adjustment to the borders does not affect the fundamental character of the electoral division, for which effective representation will continue to be possible.

Edmonton-Rutherford

It is recommended that the boundaries of the electoral division of Edmonton-Rutherford be as shown on Map 43, resulting in a population of 58,082. This bears significant similarity to the current boundaries of Edmonton-Rutherford. The only change is the addition of the areas north of Ellerslie Road, south of Anthony Henday Drive, west of Gateway Boulevard, and east of Whitemud Creek from Edmonton-South. This change is recommended to bring the populations of Edmonton-Rutherford and Edmonton-South closer together. The added areas, from a service perspective, could logically be placed in either electoral division. Given the preference for relative population parity within cities, the Commission recommends the change.

Edmonton-South

It is recommended that the boundaries of the electoral division of Edmonton-South be as shown on Map 44, resulting in a population of 57,522. Though bearing significant overlap to the current boundaries of Edmonton-South, it is proposed that this electoral division lose territory, given its growth, with all areas north of Ellerslie Road, east of Whitemud Creek, and west of Gateway Boulevard being moved to Edmonton-Rutherford. It is recommended that areas north of Anthony Henday Drive be moved to Edmonton-Whitemud. This accords with Robert Jarman’s submission. This will help better balance the populations in the electoral divisions and create clear boundaries. Moreover, it is proposed that the community of Chappelle Gardens be moved to Edmonton-South West to reduce the population size of Edmonton-South. The same is recommended for areas north and west of the Whitemud Creek but south of Anthony Henday Drive. Finally, it is recommended that areas east of

Gateway Boulevard be moved into Edmonton-Ellerslie, both because Gateway Boulevard is a more logical location for the boundary, and to reduce the population of Edmonton-South.

The variance from provincial average is a modest one. With anticipated population growth, it is well within the range for effective representation.

Edmonton-South East[†]

It is recommended that the boundaries of the new electoral division of Edmonton-South East be as shown on Map 45, resulting in a population of 52,888. This represents a logical polygon in the southeast corner of the city: a) areas in the City of Edmonton, south of 41 Avenue SW, east of Gateway Boulevard, and west of the City of Edmonton boundary; b) areas north of 41 Avenue SW, east of 66 Street SW, south of Anthony Henday Drive, and west of the city limits; c) areas north of Anthony Henday Drive, east of 34 Street NW, south of 16A Avenue NW/15 Avenue NW, and west of 17 Street NW; and d) areas north of Anthony Henday Drive, east of 50 Street NW, south of 23 Avenue NW, and west of 34 Street NW.

These borders are logical and create an electoral division in the southeast of the city with communities in common. Though below the provincial average in terms of population, these areas of Edmonton are likely to develop quickly. The variance in population average is amply justifiable.

Edmonton-South West

It is recommended that the boundaries of the electoral division of Edmonton-South West be as shown on Map 46, resulting in a population of 54,136. This electoral division mostly consists of: a) the current parts of Edmonton-South West south of the North Saskatchewan River (parts north of the river are moved to Edmonton-West-Enoch or Edmonton-McClung); b) areas north and west of the Whitemud Creek but south of Anthony Henday Drive that are currently in Edmonton-South, to better balance populations and use Whitemud Creek as a boundary; and c) the neighbourhood of Chapelle Gardens, which is moved from Edmonton-South given that it is a “standalone community” in many ways and there is otherwise significant expected growth in Edmonton-South. This electoral division’s population, though lower than the provincial average, is still well within range, and growth is expected in this electoral division in the coming years. It is mostly based on the current electoral division for which effective representation is possible. That will continue.

Edmonton-Strathcona

It is recommended that the boundaries of the electoral division of Edmonton-Strathcona be as shown on Map 47, resulting in a population of 54,093. This is the current version of the electoral division, combined with all areas of Edmonton-Riverview south of the North Saskatchewan River, but omitting the areas south of Whyte Avenue and east of 99 Street NW, which are recommended to be moved to Edmonton-Gold Bar. In the Commission’s view, this electoral division essentially keeps aspects of the University of Alberta community together, as well as neighbouring areas which are often culturally and economically linked to the university. The Commission notes that areas of Edmonton south of the North Saskatchewan River, east of the Whitemud Creek, and north of Whitemud Drive can be almost perfectly divided to create two electoral divisions with negligible variances from provincial average population and for which effective representation is possible. The Commission therefore recommends making two such electoral divisions.

Edmonton-West-Enoch[†]

It is recommended that the boundaries of the electoral division of Edmonton-West-Enoch be as shown on Map 48, resulting in a population of 56,894.

This new electoral division takes all areas previously in Edmonton-South West north of the North Saskatchewan River, west of Anthony Henday Drive, and south of Whitemud Drive. Edmonton-West-Enoch has also gained areas north of Whitemud Drive NW, west of Anthony Henday Drive, and south of Webber Greens Drive NW/92 Avenue NW from Edmonton-West Henday. This creates Edmonton-West-Enoch and helps reduce the population in Edmonton-West Henday.

In a novel recommendation, the new electoral division also includes Enoch Cree Nation. This First Nation is very integrated into the economy, culture, and infrastructure of West Edmonton. The Commission is particularly intrigued at the prospect of an Edmonton electoral division including an Indian reserve. In the Commission's view, this linking can create cultural understanding and recognize shared interests. This was also supported by submissions that the Commission received. The Commission acknowledges that these submissions did not formally come from Enoch Cree Nation, so the Commission humbly requests that Enoch Cree Nation leadership inform the Commission of its views on this proposed change to electoral division boundaries and, of course, the electoral division's name.

Finally, Edmonton-West-Enoch has gained a small number of areas outside city limits but east of Highway 60 from Drayton Valley-Devon. The acreages and prospective development in this part of Alberta bear far more in common, from an economic, service, and cultural perspective, with the City of Edmonton than with Devon (which is south of the river), much less Drayton Valley. This also helps balance population between the electoral divisions.

The electoral division's modest variance from provincial population average is justified, given the advantages of the electoral division's borders, to achieve effective representation.

Edmonton-West Henday

It is recommended that the boundaries of the electoral division of Edmonton-West Henday be as shown on Map 49, resulting in a population of 61,775.

Though bearing significant similarities to the current boundaries of the electoral division, it has lost territory north of Whitemud Drive NW, west of Anthony Henday Drive, and south of Webber Greens Drive NW/92 Avenue NW to Edmonton-West-Enoch. This creates Edmonton-West-Enoch and helps reduce the population in Edmonton-West Henday. Territory was also lost to Edmonton-North West south of 132 Avenue NW, east of 127 Street NW, north of Yellowhead Trail, and west of 113A Street NW, for reasons related to population balance and creating clearer boundaries.

Territory was also added from Edmonton-McClung north of 87 Avenue NW, west of 170 Street NW, south of 95 Avenue NW, and east of 178 Avenue NW, to better reflect the balance in population between the two electoral divisions. Further territory is recommended to be added west of 156 Street NW from Edmonton-Glenora to balance populations and create clearer borders. Finally, it is recommended that areas west of 163 Street NW, south of Stony Plain Road NW, north of 95 Avenue NW, and west of 170 Street NW be added to Edmonton-West Henday from Edmonton-Riverview. This creates clearer borders and assists in the consolidation of Edmonton-Glenora and Edmonton-Riverview. These areas are more suburban than what is often found in Edmonton-Glenora-Riverview.

Though a relatively larger variance from most urban electoral divisions, we consider this population amply justifiable given that it remains well within the target for effective representation, communities of interest are kept together, and the electoral division is very easily traversed via road.

Edmonton-Whitemud

It is recommended that the boundaries of the electoral division of Edmonton-Whitemud be as shown on Map 50, resulting in a population of 56,752. This is very similar to the current boundaries, which were noted as logical by MLA Rakhi Pancholi, though areas south and east of 23 Avenue NW and Rabbit Hill Road NW have been added insofar as they are west of the Whitemud Creek and north of Anthony Henday Boulevard. These areas were added both because of their connections to service centres within Edmonton-Whitemud and to increase the population of the electoral division. This leaves the electoral division with extremely logical and clear boundaries: west of the Whitemud Creek, north and east of Anthony Henday Drive, and south and east of the North Saskatchewan River. These clear boundaries and uniting communities of interest mean effective representation will continue.

Rest of Alberta

Airdrie-East

It is recommended that the boundaries of the electoral division of Airdrie-East be as shown on Map 51, resulting in a population of 53,952. Though the current boundaries of the electoral division were used as a starting point to draw its new version, significant changes are recommended.

Essentially, it is proposed that this electoral division contain parts of Rocky View County north of Township Road 250 and east of 8 Street (from its border with Calgary) through Airdrie to Yankee Valley Boulevard, when the western border of the electoral division moves east to the railway line before proceeding north to Township Road 282, with the western border then moving west until Range Road 20.

These recommended boundaries include the Towns of Crossfield and Irricana, and portions of the City of Airdrie east of the border described above. This is consistent with submissions of Leona Esau and Megan Stewart. This division keeps communities of interest in common in Rocky View County and the rapidly expanding City of Airdrie. Its slightly lower-than-average population is amply justified given growth expected in this area of the province. Effective representation will be achieved.

We note that this proposed division of the City of Airdrie was supported by the City of Airdrie and the Town of Crossfield. This is further evidence of the tenability and, indeed, the benefits of hybrid electoral divisions.

Airdrie-West[†]

It is recommended that the boundaries of the electoral division of Airdrie-West be as shown on Map 52, resulting in a population of 48,145. This is essentially a “new” electoral division, drawn from portions of the current Airdrie-Cochrane and Airdrie-East. It is proposed that its borders be Township Road 282 on the north and the City of Calgary’s northern limits on the south. It is recommended that Range Road 21/Highway 772 be the border on the west. On the east, it is recommended that the border be the railway line from the north until Yankee Valley Boulevard, at which point the border juts west until 8 Street, and then proceeds due south.

Essentially, consistent with submissions such as those of Jennifer Williams, Leona Esau, and Megan Stewart, this electoral division aims to represent the west side of the rapidly growing City of Airdrie,

along with surrounding areas in Rocky View County. It brings together communities of interest that can be effectively represented. Though its population may seem unusually low for an urban electoral division, that is justified on the basis that population growth in this area of the province is expected to continue rapidly.

Banff-Jasper (Banff-Kananaskis)

It is recommended that the boundaries of Banff-Jasper be as shown on Map 53, resulting in a population of 53,527.

This is largely based on the current boundaries of Banff-Kananaskis, with changes falling into two macro-level categories.

The first aims to bring in areas with a unique relationship to the Federal Government into the electoral division, by adding: a) Jasper National Park, including the Municipality of Jasper from West Yellowhead; b) a small portion of Foothills County south of the Highwood River and west of the Stimson Creek from Livingstone-Macleod; and c) portions of Clearwater County from Rimbey-Rocky Mountain House-Sundre west of Highway 734 as well as north and west of the North Saskatchewan River. The first change connects Jasper and Banff, two municipalities with significant commonalities. We thank submissions from MLA Sarah Elmeligi, former Canmore Mayor John Borrowman, Marc Lapierre, and Alan MacFadyen for this suggestion. The second change increases this electoral division's population, reduces that of Livingstone-Macleod, and brings Eden Valley 216 Indian Reserve into this electoral division, which already has significant Indian reserves. The third change also brings three Indian reserves into the electoral division, as well as communities adjacent to the Rocky Mountains that support the national parks. The third change also assists in the elimination of Rimbey-Rocky Mountain House-Sundre.

Second, it is recommended that several changes occur closer to Calgary, both to reduce this electoral division's population, and facilitate other changes occurring in electoral divisions that border Calgary, such that:

- A) Areas south of Cochrane, east of Highway 22, and north of the Elbow River be moved from Banff-Kananaskis to Cochrane-Springbank;
- B) Areas south of the Elbow River, north of the Tsuu T'ina First Nation boundary, and east of Highway 22 be moved to Calgary-West-Elbow Valley (see also the discussion of Calgary-West-Elbow Valley); and
- C) A small quadrant around Millarville be moved to High River-Vulcan as this area bears more in common, economically and culturally, with High River-Vulcan than Banff-Jasper (*this would be in Okotoks-Diamond Valley if that electoral division were to be created rather than Calgary-Okotoks*).

The electoral division is lengthy from a north-south perspective. The residents, even those located outside the national parks, are largely industry dependent on the national parks, giving the electoral division a common interest. Multiple Indian reserves are also in the electoral division, furthering the link with the Federal Government. Other changes are warranted given the changes on the borders of Calgary. The population is well within the effective representation range. To the extent that the deviation requires justification, its large geography provides such a justification. This electoral division's boundaries are consistent with our approach to effective representation for rural Alberta.

Bonnyville-Cold Lake-St. Paul

It is recommended that the boundaries of the electoral division of Bonnyville-Cold Lake-St. Paul be as shown on Map 54, with a population of 55,809. This bears significant similarities to the current electoral division of Bonnyville-Cold Lake-St. Paul, with discrete exceptions. Specifically, it is recommended that all portions of the County of St. Paul presently in Athabasca-Barrhead-Westlock be moved to Bonnyville-Cold Lake-St. Paul. This unites most of the County of St. Paul in the same electoral division. Second, it is recommended that Saddle Lake Cree Nation be moved to Slave Lake-Westlock-Athabasca.

These changes unite almost all of the County of St. Paul in a single electoral division. This brings together communities of interest more clearly. The change regarding Saddle Lake Cree Nation prevents an overcorrection from a population perspective resulting from the first proposed change. These are consistent with changes recommended by MLA Scott Cyr.

Ultimately, as a result of these changes, the boundaries of this electoral division are clear: the County of St. Paul and the municipalities within it; the MD of Bonnyville and the municipalities within it, including the City of Cold Lake (making this a hybrid electoral division); and I.C. 349 Cold Lake Air Weapons Range. While the population of the electoral division is slightly higher than ideal for a rural electoral division of this geographic size, the Commission is of the view that the variance from the provincial average is so modest, and the recommended boundaries are justifiable for other reasons, that the electoral division will clearly be a vehicle for effective representation.

We acknowledge that Mr. Cyr submitted that, due to shadow populations of temporary workers such as members of the military and/or those who work in the oil industry, the electoral division serves over 75,000 persons. This reflects the vast industry in this electoral division, and its importance to Alberta's economy. While not without sympathy to this concern of representation without taxation, we do not have enough data about these matters to be certain. In any event, while this certainly complicates the ability to effectively represent the electoral division, the Commission is satisfied that its proposed boundaries make sense and can facilitate effective representation.

Camrose

It is recommended that the boundaries of the electoral division of Camrose be as shown on Map 55, resulting in a population of 54,542.

This bears significant similarities to the current boundaries of this electoral division, though modest material changes are recommended. First, it is recommended that portions of Flagstaff County east of Highway 872, notably the Town of Hardisty, be moved to Drumheller-Stettler. These areas are far from the City of Camrose, and this recommended change is required for Drumheller-Stettler to comply with s. 15(1) of the Act. For more details of this rationale, see the discussion of Drumheller-Stettler.

Second, it is recommended that portions of Beaver and Camrose Counties as well as portions of Leduc County east of Highway 21, if north of Highway 625/Township Road 504 and east of Highway 814 even if south of Highway 625 (but excluding all of the City of Beaumont), be moved to Camrose from Maskwacis-Wetaskiwin and Leduc-Beaumont. The changes regarding Beaver and Camrose Counties unite Beaver and Camrose Counties and were advocated for by Chris Robinson and Adam Zinck. Many of the portions of Leduc County recommended for inclusion also would use the City of Camrose as a service centre. The changes also increase this electoral division's population (which was rather low, if justifiable) and reduce the populations of Wetaskiwin-Maskwacis-Ponoka, which would otherwise be too high.

In sum, this electoral division brings together Camrose County, Beaver County, almost all of Flagstaff County, portions of Leduc County with a connection to Camrose, and all constituent municipalities. These areas bear significant commonalities in rural, central-east Alberta. This electoral division will enable effective representation.

Cardston-Taber-Warner (Taber-Warner)

It is recommended that the boundaries of the electoral division of Cardston-Taber-Warner be as shown on Map 56, resulting in a population of 54,933.

This electoral division has undergone significant changes from the current boundaries of Taber-Warner and Cardston-Siksika, to reflect changes in the distribution of population of Southern Alberta. Most notably, it is recommended that all of Cardston County, and its towns of Cardston and Magrath, be joined to the electoral division. The fact that there was a previous version of Cardston-Taber-Warner underscores to the Commission that this electoral division contains communities of interest that can be effectively represented. History proves that this configuration can provide effective representation.

To slightly reduce the population and keep communities of interest in common, it is nonetheless recommended that portions of Lethbridge County that had been in Taber-Warner be moved to Livingstone-Macleod. This keeps Lethbridge County in a single electoral division. In a similar vein, portions of the MD of Taber, which were previously not in Taber-Warner, are recommended for inclusion in Cardston-Taber-Warner, to better balance population and use municipal boundaries to create clear lines.

In the vein of uniting municipal boundaries, the Commission has elected to include all of County of Forty Mile in Cardston-Taber-Warner and all of Cypress County in Medicine Hat-Cypress. This also balances populations and creates clear boundaries. This is addressed in more depth in the description of Medicine Hat-Cypress.

In sum, this electoral division contains the entirety of four counties/municipal districts and their constituent municipalities, which have been paired in a previous electoral division, to create an electoral division with a population within four persons of the provincial average. The Commission is confident that effective representation will be facilitated by this electoral division.

Chestermere-Strathmore

It is recommended that the boundaries of the electoral division of Chestermere-Strathmore be as shown on Map 57, resulting in a population of 54,859. Though largely based on the current boundaries of Chestermere-Strathmore, given population growth in and near Calgary, notable changes are recommended to this electoral division. Its geography is becoming more compact, given territory gained by Airdrie-East to create another electoral division between Airdrie and Cochrane. It should be underscored that the Commission expects these recommended changes to facilitate effective representation, by concentrating the electoral division on portions of two counties near Calgary. Notably, this recommended electoral division is to include:

- A) Portions of Rocky View County south of Township Road 250, including the City of Chestermere, but excluding the Hamlet of Conrich, which is recommended for inclusion in Calgary-Cross for reasons noted in the discussion of Calgary-Cross;
- B) Portions of Wheatland County south of Township Road 250 and north of Highway 1, if west of the Town of Strathmore; and
- C) The Town of Strathmore.

This proposed electoral division takes the current Chestermere-Strathmore and makes it smaller and more compact in light of population growth. Its population is extremely close to the provincial average. Effective representation has occurred in the current boundaries and will only increase.

Cochrane-Springbank (Airdrie-Cochrane)

It is recommended that the boundaries of the electoral division of Cochrane-Springbank be as shown on Map 58, resulting in a population of 56,487. This electoral division is largely based on the current Airdrie-Cochrane. To reflect the exceptional population growth and new electoral division in Airdrie, however, the eastern boundary is proposed to be Range Road 21/Highway 772. To increase the population given the loss of these eastern portions of the electoral division, it is recommended that areas south of Cochrane, east of Highway 22, and north of the Elbow River be moved to Cochrane-Springbank from Banff-Kananaskis. These areas are more suburban and more likely to receive services and have more in common with Cochrane-Springbank than the unique newly redrawn Banff-Jasper.

This electoral division, similar to what was advocated for by Anita McDonald and Ross Watson, will result in effective representation with a manageable geography and communities of interest in areas adjacent to Calgary.

Drumheller-Stettler

It is recommended that the boundaries of the electoral division of Drumheller-Stettler be as shown on Map 59, resulting in a population of 42,179.

This electoral division in southeastern Alberta is relatively unchanged from the last redistricting, though portions of Flagstaff County east of Highway 872, notably the Town of Hardisty, are recommended for inclusion from Camrose. This recommended change (suggested by Brian Golka and supported by Adam Zinck) is also required for Drumheller-Stettler to comply with s. 15(1) of the Act.

This electoral division admittedly has an unusually low population compared to the rest of rural Southern Alberta. However, we consider this reasonable given the common interest of the constituent communities as well as their including the Special Areas in Alberta, where the link between constituents and the Provincial Government is greater than in traditional municipalities. Moreover, the Commissioners could not draw a satisfactory map of rural Southern Alberta that did not have one electoral division whose population was not at least approaching the 25% variance.

Fort McMurray-Lac La Biche*

It is recommended that the boundaries of the electoral division of Fort McMurray-Lac La Biche be as shown on Map 60, resulting in a population of 47,304. This degree of negative variance is supported by the geographically large area that the MLA must represent, as well as the virtually unanimous submissions from MLAs and residents of this electoral division that the boundaries make sense, in accordance with the 2017 report, and there should be no attempt to reduce representation to a single MLA. This point was made well by Vaughn Jessome, who has been a constituency manager for MLAs Brian Jean and Tany Yao and former MLA Guy Boutilier. This is an example where, “other things were equal,” warranting maintenance of the *status quo*. This is a hybrid electoral division that no one seriously argued against maintaining as such.

Fort McMurray-Wood Buffalo*

It is recommended that the boundaries of the electoral division of Fort McMurray-Wood Buffalo be as shown on Map 61, resulting in a population of 46,721. This degree of negative variance is supported

by the geographically large area that the MLA must represent, as well as the virtually unanimous submissions from MLAs and residents of this electoral division that the boundaries make sense, in accordance with the 2017 report, and there should be no attempt to reduce representation to a single MLA. This point was made well by Vaughn Jessome, who has been a constituency manager for MLAs Brian Jean and Tany Yao and former MLA Guy Boutilier. This is an example where, “other things were equal,” warranting maintenance of the *status quo*. This is a hybrid electoral division that no one seriously argued against maintaining as such.

Fort Saskatchewan-Vegreville

It is recommended that the boundaries of the electoral division of Fort Saskatchewan-Vegreville be as shown on Map 62, resulting in a population of 57,287. This is very similar to the current boundaries of this electoral division. Two modest changes are recommended.

First, it is recommended that portions of the County of Minburn east of Highway 881 be moved to Vermilion-Lloydminster-Wainwright. This helps balance the population between the two electoral divisions. Moreover, despite living in the County of Minburn, these individuals are more likely to receive services from Vermilion rather than Vegreville. The Commission is nonetheless particularly curious for submissions on this recommended change.

Second, it is recommended that areas of Strathcona County south of Township Road 535 and west of Highway 21 be added to Sherwood Park. This modest change can help, if only slightly, close the population gap between Sherwood Park and Fort Saskatchewan-Vegreville, and reflects that growth in this area will use Sherwood Park as a service centre rather than Fort Saskatchewan.

In sum, despite a slightly higher-than-average population, this proposed electoral division brings together Fort Saskatchewan, parts of Strathcona County, and the Counties of Minburn, Two Hills, and Lamont to form a suburban and rural electoral division. This electoral division, consisting of a city and several rural areas, illustrates the necessity of hybrid electoral divisions and the fact that they are not new.

Grande Prairie*

It is recommended that the boundaries of the electoral division of Grande Prairie be as shown on Map 63, resulting in a population of 50,352. These are exactly the same boundaries as the present boundaries of Grande Prairie. Though moderately below the provincial average, this remains well within statutory and constitutional requirements. Moreover, the vast distance from the Legislature, and the fact that electoral division logically works in its current format, all warrant preserving the *status quo* as an appropriate way to achieve effective representation.

Grande Prairie-Wapiti

It is recommended that the boundaries of the electoral division of Grande Prairie-Wapiti be as shown on Map 64, resulting in a population of 56,276.

This is largely based on the current hybrid electoral division of Grande Prairie-Wapiti, but it also includes Saddle Hills County, which is recommended for inclusion to reduce the geographic scope of Peace River-Notley, and considering its closeness to Grande Prairie.

The Commission is confident that effective representation can follow given communities in common. The slightly higher-than-average population can be justified for this reason, as well as the benefits of the boundaries of neighbouring electoral divisions.

The Commission is not, at this time, recommending changes to the boundaries of Grande Prairie to better balance the population between Grande Prairie and Grande Prairie-Wapiti, but would happily receive submissions in this regard.

High River-Vulcan (Cardston-Siksika)

It is recommended that the boundaries of the electoral division of High River-Vulcan be as shown on Map 65, resulting in a population of 56,029. This can be considered a successor to the electoral division of Cardston-Siksika, despite the lack of overlap in name.

This electoral division is drawn from many current electoral divisions. The large changes to the electoral division are partially the consequence of the cumulation of changes to other electoral divisions described elsewhere as well as the undesirable boundaries of Cardston-Siksika. The electoral division can be effectively represented, bringing together communities of interest, largely through:

- A) The entirety of Vulcan County and constituent municipalities;
- B) Portions of Wheatland County except the Town of Strathmore and rural areas west of Strathmore, north of Highway 1, and south of Township Road 250; and
- C) Foothills County and constituent municipalities south of the border with Banff-Jasper, excluding:
 - a. The Town of Okotoks and areas north of Okotoks, east of 48 Street West, south of the Bow River and the City of Calgary boundaries, north of 338 Avenue East, and west of 272 Street East, which are recommended for inclusion in Calgary-Okotoks; and
 - b. Areas south of the Highwood River and west of Stimson Creek, notably including Eden Valley 216 Indian Reserve, which are recommended for inclusion in Banff-Jasper.

This electoral division essentially unites rural areas south and east of Calgary in a logical “L” shape. While residents would occasionally go to Calgary for services, these communities are certainly rural and not suburban or even bedroom communities. Uniting most of the three counties underscores the communities of interest being kept together. The modest deviance from the average population is well within statutory and constitutional limits. To the extent this requires justification, the logical nature of the boundaries justify the variance.

If the Okotoks-Diamond Valley electoral division were adopted instead of Calgary-Okotoks, this electoral division’s population would be reduced to 55,297, as illustrated on Map 65B. The Town of Diamond Valley, as well as all parts of Foothills County south of the border with Banff-Jasper and north of Highway 7 (immediately west of Okotoks) and the Sheep River (further west) would create Okotoks-Diamond Valley. However, parts of the Municipal District of Willow Creek roughly north of and including the Town of Claresholm would be moved to High River-Vulcan from Livingstone-Macleod.

Lac Ste. Anne-Parkland

It is recommended that the boundaries of the electoral division of Lac Ste. Anne-Parkland be as shown on Map 66, resulting in a population of 54,524.

This is largely based on the current boundaries of Lac Ste. Anne-Parkland, but with some notable adjustments.

First, it is recommended that all of the County of Barrhead, including the Town of Barrhead, be moved into this electoral division, to reduce the population of the sprawling Slave Lake-Westlock-Athabasca, and reflect the transportation links of Barrhead with communities to its south.

Second, it is recommended that all portions of Yellowhead County in Lac Ste. Anne-Parkland be moved to West Yellowhead, to keep the county together, and increase the population of West Yellowhead.

Third, it is recommended that areas in the current boundaries of Lac Ste. Anne-Parkland east of Highway 779 and south of the CN Rail line be moved to Spruce Grove, to a) reflect that fact that these areas bear more in common with areas adjacent to Edmonton than with a very rural quasi-northern electoral division; and b) increase the population of Spruce Grove, given the loss of Stony Plain from its electoral division.

Fourth, it is recommended, in accordance with the map, that areas annexed by St. Albert be moved to St. Albert.

Fifth, it is recommended that areas south of Highway 16 and north of Stony Plain be moved to Stony Plain-Drayton Valley-Devon, to reflect this area's comparative connection to Stony Plain rather than Lac Ste. Anne-Parkland.

Sixth, it is recommended that all other areas of Parkland County in Drayton Valley-Devon be moved to Lac Ste. Anne-Parkland, with the exception of those east of Range Road 10 (if south of Highway 627) or Range Road 16 (if north of Highway 627), not including the areas of Parkland County contained within the proposed electoral divisions of Spruce Grove and Edmonton-West-Enoch. This helps balance populations between Stony Plain-Drayton Valley-Devon and Lac Ste. Anne-Parkland and unites the vast majority of Parkland County in Lac Ste. Anne-Parkland.

Seventh, it is recommended that portions of Westlock County that were previously in Lac Ste. Anne-Parkland be moved to Slave Lake-Westlock-Athabasca to balance populations and unite all of Westlock County.

In sum, these changes create an electoral division that is rural and contains many communities with common interests and transportation routes as one travels northwest of Edmonton. The population is slightly lower than the provincial average but well within the effective representation range. A slightly lower-than-average population is also eminently justifiable given the electoral division's large geography.

Lacombe-Rocky Mountain House [Rimbey-Rocky Mountain House-Sundre and Lacombe-Ponoka]

It is recommended that the boundaries of the electoral division of Lacombe-Rocky Mountain House be as shown on Map 67, resulting in a population of 53,580.

The current electoral division of Lacombe-Ponoka is the basis of this electoral division, but significant changes have been made, reflecting the recommendation that Rimbey-Rocky Mountain House-Sundre be removed. First, it is recommended that all portions of Ponoka County be moved to Wetaskiwin-Maskwacis-Ponoka.

To compensate for this, it is recommended that all portions of Lacombe County presently in Rimbey-Rocky Mountain House-Sundre be moved to this electoral division. This unites all of Lacombe County, including constituent municipalities, in this electoral division. An exception is the small area immediately north of Sylvan Lake, as discussed in the description of Sylvan Lake-Innisfail.

It is further recommended that all portions of Clearwater County north of Highway 11 and east of the North Saskatchewan River, including the Town of Rocky Mountain House, be included in this electoral division. This balances the populations of the electoral divisions in the Highway 2 corridor. Moreover, the geography of this electoral division is manageable. It brings together two neighbouring counties and their constituent municipalities where agriculture is a dominant industry. These borders will enable effective representation. The modest variance from provincial population average is amply justifiable given the rural nature of the electoral division.

Leduc-Beaumont

It is recommended that the boundaries of the electoral division of Leduc-Beaumont be as shown on Map 68, resulting in a population of 57,548. Because of the decision to move the eastern half of Beaumont into an electoral division with Strathcona-Sherwood Park, this electoral division required additional territory to increase its population. It is recommended, therefore, that apart from the City of Leduc, the western half of Beaumont, and the portions of Leduc County in the current electoral division of Leduc-Beaumont, that the following areas in Leduc County be added to Leduc-Beaumont:

- Areas east of Highway 795 if south of Township Road 500, but excluding all of the Town of Calmar;
- Areas east of Highway 60 if north of Township Road 500; and
- Areas west of Highway 814 if east of the lines noted above.

All of the areas in this hybrid electoral division are united by a common characteristic: they use Leduc and/or Beaumont as service centres, and none are particularly far from them. They form an electoral division of a small city, part of another small city, and adjacent portions of a neighbouring county, united by common economic and social interests. The population is above provincial average, but well within constitutional and statutory limits. To the extent the variance requires justification, this is justifiable given the compact size of the electoral division and the advantages of the borders of neighbouring electoral divisions.

Lethbridge-East

It is recommended that the boundaries of the electoral division of Lethbridge-East be as shown on Map 69, resulting in a population of 57,463. This electoral division is slightly changed from its current boundaries. These changes accorded with the understanding that the electoral division has not seen population growth to the same extent as Lethbridge-West and that Lethbridge-West will see more development and corresponding population growth in the future. The border—largely 13 Street—within Lethbridge makes sense, as noted in submissions such as those of Belinda Crowson. The necessary change to the 13 Street South border is an inclusion of the area south and east of Whoop Up Drive/6 Avenue and east of Scenic Drive and the line extending in a southerly direction at the intersection of Scenic Drive and 18 Avenue South to the southern boundary of the city. The population being modestly above the provincial average is justified considering the desire to keep communities of interest together and the majority of the current development and expected future development in Lethbridge occurring on the west side of the city. In any event, the variance is well within statutory and constitutional limits.

Lethbridge-West

It is recommended that the boundaries of the electoral division of Lethbridge-West be as shown on Map 70, resulting in a population of 53,937. This electoral division is slightly changed from its current boundaries. As noted above, this accorded with the disparate population growth that has occurred in Lethbridge-West and the anticipated disparate future population growth. The border—largely 13

Street—within Lethbridge makes sense, as noted in submissions such as those of Belinda Crowson. The necessary change to the 13 Street South border is an exclusion of the area south and east of Whoop Up Drive/6 Avenue and east of Scenic Drive and the line extending in a southerly direction at the intersection of Scenic Drive and 18 Avenue South to the southern boundary of the city. The proposed boundaries closely adhere to the average population while providing for the anticipated future population growth. In any event, the modest variance from population average is well within statutory and constitutional limits.

Livingstone-Macleod

It is recommended that the boundaries of the electoral division of Livingstone-Macleod be as shown on Map 71, resulting in a population of 60,036. While this bears significant similarities to its current boundaries, two major changes are recommended. The first is that Lethbridge County (excluding the City of Lethbridge) be added to the electoral division in light of the reconfiguration of Cardston-Siksika into High River-Vulcan. The second, to reduce population and considering changes made in areas adjacent to Calgary, is to exclude all parts of Foothills County that had previously been in the electoral division. These areas are recommended for inclusion in High River-Vulcan, but for a small portion recommended for inclusion in Banff-Jasper.

By and large, these new boundaries facilitate effective representation by bringing together Lethbridge County, the Municipal Districts of Willow Creek, Pincher Creek, and Ranchland, as well as Waterton Lakes National Park, and the Municipality of Crowsnest Pass. These are communities of interest in rural Southern Alberta and can be effectively represented. While the population is above the provincial average, significant growth is not expected in this area, and the population is well within legal ranges.

If the Okotoks-Diamond Valley electoral division were adopted instead of Calgary-Okotoks, this electoral division's population would be 50,442, as illustrated on Map 71B. This would be a significant reduction, as portions of the Municipal District of Willow Creek, roughly north of and including the Town of Claresholm, would be moved to High River-Vulcan.

Mackenzie (Section 15(2)) (Lesser Slave Lake)

It is recommended that the boundaries of the electoral division of Mackenzie be as shown on Map 72, resulting in a population of 39,072. This is the only electoral division in the province with a variance greater than 25% from the provincial average, but this nonetheless is permitted as *all five* criteria permitting such a variance pursuant to Section 15(2) of the Act are present in the case of this electoral division (when only three are required):

- (a) the area of the proposed electoral division exceeds 20 000 square kilometres or the total surveyed area of the proposed electoral division exceeds 15 000 square kilometres;
- (b) the distance from the Legislature Building in Edmonton to the nearest boundary of the proposed electoral division by the most direct highway route is more than 150 kilometres;
- (c) there is no town in the proposed electoral division that has a population exceeding 8000 people;
- (d) the area of the proposed electoral division contains an Indian reserve or a Metis settlement; and
- (e) the proposed electoral division has a portion of its boundary coterminous with a boundary of the Province of Alberta.

This electoral division's boundaries have been chosen to reflect the interest of the northern-central regions of the province with particular view to the desirability of an electoral division having a high Indigenous population. In this vein, the division consists of:

- 1) All portions of the current Lesser Slave Lake except:
 - a. MD of Lesser Slave River and its constituent municipalities, which are moved to Slave Lake-Westlock-Athabasca for reasons of population distribution, road connections, and a preference to unite the municipality; and
 - b. Portions in the southwest corner of Big Lakes County south and west of a line that can be described as follows: commencing at the intersection of Highway 679 and the western border of Big Lakes County, travelling east until Range Road 155A, southwest until Range Road 155, southeast until Range Road 153, south until Township Road 752A, northeast until Highway 750, south until the northern border of Sucker Creek First Nation, west until Range Road 154, due south until the northern border of East Prairie Metis Settlement, west, then south, then east on the borders of East Prairie Metis Settlement, and south along the East Prairie River until the first time it reaches a southern border of Big Lakes County—these areas are recommended for inclusion into Peace River-Notley as they are economically and infrastructurally part of the Peace River corridor, and they increase the percentage of Mackenzie that is Indigenous;
- 2) Mackenzie County and its constituent towns; and
- 3) Paddle Prairie Metis Settlement.

It is the Commission's view that this electoral division will be a vehicle for effective representation. Despite the large geography, the population in this electoral division is the smallest in the province. Like Lesser Slave Lake, it consists of large parts of four municipalities connected via road in the province's north and central regions.

The name "Mackenzie" is chosen from the county which is the home to most of the electoral division's population. The Commission would welcome feedback on the name. The Commission would be especially grateful for feedback from affected Indigenous Albertans about this electoral division, as well as its surrounding electoral divisions.

Medicine Hat-Brooks* (Brooks-Medicine Hat)

It is recommended that the boundaries of the electoral division of Medicine Hat-Brooks be as shown on Map 73, resulting in a population of 54,898. These boundaries are unchanged from the last redistricting.

The Commission received several submissions that Brooks and especially Bassano are not well situated to be paired with Medicine Hat, as residents of these municipalities drive west rather than east to receive services, and/or it would be preferable for Medicine Hat to have a single urban electoral division. However, this was not a unanimously held opinion, and many submissions requested the electoral divisions be kept as is. In our view, the principle of effective representation warrants keeping this electoral division as is.

Keeping the Medicine Hat electoral divisions hybrid but the Lethbridge electoral divisions purely urban also reflects that submissions concerning both were clearly divided. The Commission understands arguments both ways and, therefore, is compromising by keeping Medicine Hat hybrid and Lethbridge purely urban at this time.

We also note that the pragmatic consequence of having a Medicine Hat electoral division that is purely urban would be an enormously large geographic territory—essentially, all territory in Brooks-Medicine Hat and Cypress-Medicine Hat not in the City of Medicine Hat—being united in a single electoral division with the remnants of Medicine Hat. This did not strike us as an ideal way to achieve effective representation. This has not been the reality since the 1980s.

We also note that this electoral division's population is the second closest in the province to the provincial average. This is another reason to preserve the *status quo*.

For reasons similar to Medicine Hat-Cypress, we propose that this electoral division be renamed Medicine Hat-Brooks, as every other city of over 50,000 people in Alberta has its name at the beginning of an electoral division. Medicine Hat warrants the same treatment as the larger municipality.

The Commission did consider making the South Saskatchewan River a consistent border between Medicine Hat-Cypress and Medicine Hat-Brooks. This would have resulted in Medicine Hat-Cypress having a slightly higher population and Medicine Hat-Brooks having a slightly lower population. Despite the advantages of the clear border, and the relatively modest change to population, the Commission elected to preserve the *status quo*.

Medicine Hat-Cypress (Cypress-Medicine Hat)

It is recommended that the boundaries of the electoral division of Medicine Hat-Cypress be as shown on Map 74, resulting in a population of 54,144. This represents minor changes from the last redistricting and follows the good practice of aligning with county boundaries, specifically those of Cypress and Forty Mile. All of County of Forty Mile is recommended for inclusion in Cardston-Taber-Warner while all of Cypress County is recommended for inclusion in Medicine Hat-Cypress. Following county boundaries will also result in populations that are very close in number in the southeast of the province. Given the closeness to the provincial average and the preference, in case of ambiguity, to preserve close to the *status quo*, we elected to preserve close to the *status quo*, which, submissions informed us, facilitates effective representation. This accorded with submissions, such as those of MLA Justin Wright.

Significant submissions, including from former MLAs Bob Wanner and Rob Renner, suggested that the County of Forty Mile be placed in this electoral division so as to make the county closer to its major service centre, Medicine Hat. The problem with this submission was that it would make the electoral division much larger from a population perspective. Moreover, it would have made Cardston-Taber-Warner much smaller, with a population variance that, while legal from a constitutional law perspective, would still have been more difficult to justify. While both would have remained within the effective representation range, in the face of mixed signalling regarding whether to move the County of Forty Mile, we opted to continue with the *status quo*.

We propose that this electoral division be renamed Medicine Hat-Cypress, as every other large city in Alberta has its name at the beginning of an electoral division. Medicine Hat warrants the same treatment. As well, our naming tradition is to start with the larger municipality in the name.

The Commission did consider making the South Saskatchewan River a consistent border between Medicine Hat-Cypress and Medicine Hat-Brooks. This would have resulted in Medicine Hat-Cypress having a slightly higher population and Medicine Hat-Brooks having a slightly lower population. Despite the advantages of the clear border, and the relatively modest change to population, the Commission elected to preserve the *status quo*.

Mountain View-Kneehill (Olds-Didsbury-Three Hills)

It is recommended that the boundaries of the electoral division of Mountain View-Kneehill be as shown on Map 75, resulting in a population of 56,378.

This electoral division has been significantly changed from the current Olds-Didsbury-Three-Hills, as it has lost territory in its South and East to Airdrie-East (most portions of Rocky View County in Olds-Didsbury-Three Hills, to create an additional electoral division in Airdrie) and High River-Vulcan (specifically, all parts of Wheatland County). These changes are further explained in the discussions of High River-Vulcan and Airdrie-East but also enable additional changes to Mountain View-Kneehill that will facilitate effective representation.

Two areas are recommended to be added to the electoral division. First, it is recommended that portions of Mountain View County that were previously in Rimbey-Rocky Mountain House-Sundre be moved to Mountain View-Kneehill. Not only does this unite all of Mountain View County; it enables the elimination of Rimbey-Rocky Mountain House-Sundre. Second, it is recommended that portions of Clearwater County south of the North Saskatchewan River (if west of Rocky Mountain House) or Highway 11 (if east of Rocky Mountain House) and east of Highway 734 also be added from Rimbey-Rocky Mountain House-Sundre. These areas are integrated with the western part of Mountain View County and facilitate the elimination of Rimbey-Rocky Mountain House-Sundre.

In sum, Mountain View-Kneehill brings together the entirety of two counties (Mountain View and Kneehill), a discrete connected portion of Clearwater County, and a small part of Rocky View County previously in Olds-Didsbury-Three Hills. The modest population variance is justified given the advantages of the borders and relative lack of expected growth. Effective representation will continue.

Given that four towns previously in electoral divisions' names were placed in this constituency (Olds, Didsbury, Three Hills, and Sundre), it is recommended that this electoral division be renamed Mountain View-Kneehill. This acknowledges the counties which form the heart of the electoral division and makes the name more concise. Moreover, even parts of the electoral division that are not in the two counties are in the "view" of the Rocky Mountains.

Peace River-Notley [Central Peace-Notley and Peace River]

It is recommended that the boundaries of the electoral division of Peace River-Notley be as shown on Map 76, resulting in a population of 48,602. This electoral division represents the Peace River corridor in the northwest of the province.

As noted above, maintaining both Peace River electoral divisions in their current forms was not tenable given the cascading consequences in the rest of Alberta. Accordingly, the Commission sought to mostly merge the two electoral divisions in this area to create a single electoral division that represents the Peace Region of the province. Accordingly, this electoral division is drawn from:

- All of the current Central Peace-Notley except Saddle Hills County, which is moved to Grande Prairie-Wapiti, because of its proximity to Grande Prairie and to make Peace River-Notley more geographically manageable;
- All of Peace River, except Mackenzie County and Paddle Prairie Metis Settlement, which borders Mackenzie County at the far northeast corner of County of Northern Lights; and
- Territory in Big Lakes County in Lesser Slave Lake that is adjacent to the Peace River corridor, notably areas south and west of a line that can be described as follows: commencing at the intersection of Highway 679 and the western border of Big Lakes County, travelling east until Range Road 155A, southwest until Range Road 155, southeast until Range Road 153, south until Township Road 752A, northeast until Highway 750, south until the northern border of Kapawe'no First Nation, west until Range Road 154, due south until the northern border of East Prairie Metis Settlement, west, then south, then east on the borders of East Prairie Metis Settlement, and south along the East Prairie River until the first time it reaches a southern border of Big Lakes County.

This riding will be a vehicle for effective representation in the Peace Region. Though the population variance is significant, it is well within the statutory and constitutional range and is justified considering the vast geography. Areas of the merged electoral division are connected via road and bear commonalities as part of the Peace Region.

Red Deer-North

It is recommended that the boundaries of the electoral division of Red Deer-North be as shown on Map 77, resulting in a population of 53,798. It is recommended that this electoral division's boundaries be essentially unchanged since the last distribution. Its population is extremely close to the provincial average, it keeps the City of Red Deer neatly divided between two electoral divisions, and the dividing line within Red Deer is clear and is satisfactory in light of a lack of submissions for change. Effective representation will continue.

A small amount of territory has been moved to Red Deer-North from Innisfail-Sylvan Lake to reflect the annexation of this territory by the City of Red Deer.

Red Deer-South*

It is recommended that the boundaries of the electoral division of Red Deer-South be as shown on Map 78, resulting in a population of 59,123. It is recommended that this electoral division's borders be unchanged. Though moderately above the provincial average, this is well within statutory and constitutional limits. Keeping this electoral division essentially unchanged keeps the City of Red Deer neatly divided between two electoral divisions, and the dividing line within Red Deer is clear and satisfactory in light of a lack of submissions for change. Effective representation will continue.

Sherwood Park

It is recommended that the boundaries of the electoral division of Sherwood Park be as shown on Map 79, resulting in a population of 55,284. This is largely based on the current boundaries of Sherwood Park. Three modest changes are recommended. The first is adding areas of Strathcona County south of Township Road 535 and west of Highway 21 from Fort Saskatchewan-Vegreville. This modest change can help, if only slightly, close the population gap between Sherwood Park and Fort Saskatchewan-Vegreville, and reflects that growth in this area will use Sherwood Park as a service centre rather than Fort Saskatchewan. The second is adding areas in the Hamlet of Sherwood Park from Strathcona-Sherwood Park north of Foxhaven Park/Heritage Hills Wetland and south of Baseline Road. These areas can clearly be represented in the urban community of Sherwood Park. Moreover, this helps balance population between Sherwood Park and Sherwood Park-Strathcona. The third is adding areas west of Clover Bar Road that have been added to the USA of Sherwood Park since the last redistribution. This better respects municipal boundaries and also balances populations between Sherwood Park and Strathcona-Sherwood Park.

In sum, this electoral division reflects the interests of a hamlet and recognizes that those interests do not stop at the hamlet's borders. Effective representation will certainly be possible. The population is extremely close to the provincial average. To the extent that justification is required for its slightly higher-than-average population, its compact urban nature provides that justification.

Slave Lake-Westlock-Athabasca (Athabasca-Barrhead-Westlock)

It is recommended that the boundaries of the electoral division of Slave Lake-Westlock-Athabasca be as shown on Map 80, resulting in a population of 46,076. Significant changes have occurred compared

to the current boundaries of the electoral division of Athabasca-Barrhead-Westlock, as this electoral division shifts north in its orientation.

First, and on a relatively modest note, it is recommended that two areas be exchanged between this electoral division and Bonnyville-Cold Lake-St. Paul:

- It is recommended that portions of the County of St. Paul presently in Athabasca-Barrhead-Westlock be moved to Bonnyville-Cold Lake-St. Paul;
- It is recommended that Saddle Lake Cree Nation be moved to Slave Lake-Westlock-Athabasca.

The first proposed change unites all of the County of St. Paul in a single electoral division. This brings together communities of interest more clearly and helps balance the population between the two electoral divisions. The second proposed change prevents an overcorrection from a population perspective resulting from the first proposed change, and unites Smoky Lake County (but for two Metis settlements, which are recommended to remain in Fort McMurray-Lac La Biche).

Second, it is recommended that areas of Big Lakes County and Woodlands County presently in Athabasca-Barrhead-Westlock be moved to West Yellowhead. This unites Woodlands County, increases the population of West Yellowhead, and reflects the link between the Town of Swan Hills and Woodlands County. This is also consistent with local submissions of Joe Blakeman and Nick Gelych, who cautioned against dividing counties.

Third, it is recommended that portions of the County of Barrhead, including the Town of Barrhead, be moved to Lac Ste. Anne-Parkland. These areas are joined with Lac Ste. Anne County from an infrastructure perspective and enable the final and most consequential change.

Fourth, it is recommended that portions of Westlock County that were previously in Lac Ste. Anne-Parkland be moved to this electoral division to increase this electoral division's population and unite all of Westlock County.

That final and most consequential change is the addition of all of the MD of Lesser Slave River, including the Town of Slave Lake, from Lesser Slave Lake. These areas are well connected via road to Slave Lake-Westlock-Athabasca. Adding these areas to Slave Lake-Westlock-Athabasca also enables the elimination of an electoral division in the north/near-north of the province. It unites the MD of Lesser Slave River in a single electoral division. The Commission is reluctant to remove an electoral division from the north of the province, but making Slave Lake-Westlock-Athabasca more northern in orientation helps ensure effective representation for the north.

In sum, this creates an electoral division that can be effectively represented, uniting Smoky Lake County, Thorhild County, Athabasca County, Westlock County, and the MD of Lesser Slave River. This uniting of counties that were previously divided will facilitate effective representation. The population, though lower than the provincial average, is well within statutory and constitutional limits. To the extent the deviance from provincial average requires justification, the division's vast geography and increasingly northern orientation provides that justification.

Spruce Grove (Spruce Grove-Stony Plain)

It is recommended that the boundaries of the electoral division of Spruce Grove be as shown on Map 81, resulting in a population of 53,505. Spruce Grove has been separated from Stony Plain in light of changes elsewhere in this region and Spruce Grove's population growth. To increase Spruce Grove's population size, it is recommended that it gain additional area adjacent to the city in Parkland County:

- A) From Lac Ste. Anne-Parkland, areas east of Highway 779 and south of the CN Rail line, areas that bear more in common with areas adjacent to Edmonton than with the sprawling quasi-northern electoral division that is Lac Ste. Anne-Parkland;
- B) From Drayton Valley-Devon, areas north of Highway 628 and east of the City of Spruce Grove, which are also much closer to Spruce Grove than Stony Plain, much less Drayton Valley; and
- C) From Drayton Valley-Devon, areas (not in the Town of Stony Plain) north of Highway 627, east of Range Road 275, south of Highway 628, and west of Enoch Cree Nation, given the proximity to Spruce Grove and to balance populations.

In sum, this electoral division reflects the interests of a small city and neighbouring areas in the bordering county. The current MLA for Spruce Grove-Stony Plain, Searle Turton, acknowledged the current boundaries necessitated dividing Spruce Grove and Stony Plain. Effective representation of this hybrid electoral division will clearly be possible. Indeed, this is similar to what Spruce Grove Mayor Jeff Acker submitted in arguing for “moving to a division that better aligns with the City of Spruce Grove’s boundaries.” The population is well within statutory and constitutional limits. To the extent that justification is required for its slightly lower-than-average population, anticipated growth in areas bordering both Spruce Grove and Edmonton provides that justification.

St. Albert

It is recommended that the boundaries of the electoral division of St. Albert be as shown on Map 82, resulting in a population of 53,130. This is very similar to the current boundaries of St. Albert, which consist of areas of St. Albert to the south and west of St. Albert Trail and Boudreau Road. It is recommended that a small area be added to the electoral division from Lac Ste. Anne-Parkland given its annexation by the City of St. Albert.

In sum, this electoral division reflects the interests of a small city. Effective representation will certainly be possible. The population is extremely close to the provincial average. To the extent that justification is required for its slightly lower-than-average population, anticipated growth provides that justification, as does keeping the City of St. Albert relatively intact. It accords with local submissions, such as those received from Patricia McGrath, Mary O’Neill, Andrew Traynor, and Glenn Walmsley.

St. Albert-Sturgeon* (Morinville-St. Albert)

It is recommended that the boundaries of the electoral division of St. Albert-Sturgeon be as shown on Map 83, resulting in a population of 53,936. It is recommended that this electoral division be unchanged from those of Morinville-St. Albert, being: a) the City of St. Albert north and east of St. Albert Trail and Boudreau Road; and b) Sturgeon County east of Highway 2, including the towns of Morinville, Legal, Bon Accord, Gibbons, and Redwater. This is a hybrid electoral division that has led to effective representation and will continue to do so.

In sum, this electoral division reflects the interests of a small city and connected portions of the adjacent Sturgeon County. Effective representation has occurred and will continue to occur. The population is close to the provincial average. To the extent that justification is required for its slightly lower-than-average population, anticipated growth provides that justification. Effective representation is best facilitated by maintaining the *status quo*, supported by submissions such as those of Dennis Schmidt and Andrew Traynor.

We recommend that this electoral division be renamed St. Albert-Sturgeon, to: a) reflect the practice of placing the largest municipality first in the names of electoral divisions; and b) recognize all of Sturgeon County, and the fact that there are many towns within the county in the electoral division.

The Commission is particularly curious about the prospect of moving areas of Edmonton-Manning that are north of Valour Road to St. Albert-Sturgeon. This would help balance the population of the two electoral divisions, in addition to reflecting the fact that these areas of Edmonton bear significant commonalities to Sturgeon County, and significant urbanization is not expected in the near future.

Stony Plain-Drayton Valley-Devon (Drayton Valley-Devon)

It is recommended that the boundaries of the electoral division of Stony Plain-Drayton Valley-Devon be as shown on Map 84, resulting in a population of 55,066. This electoral division bears similarity to the present Drayton Valley-Devon, with several consequential changes.

First, it is recommended that the Town of Stony Plain be moved into the electoral division from Spruce Grove-Stony Plain. Spruce Grove and areas immediately surrounding it warrant an electoral division of their own. Though the relationship between Stony Plain and Drayton Valley is not obvious, in the circumstances, this division will yield effective representation for Alberta, especially considering the link between Stony Plain and Devon. As part of the creation of Spruce Grove, it is recommended that areas of Parkland County presently in Drayton Valley-Devon be moved to Spruce Grove if north of Highway 628 and east of the Town of Stony Plain. It is also recommended that areas (not in the Town of Stony Plain) north of Highway 627, east of Range Road 275, south of Highway 628, and west of Enoch Cree Nation also be moved to Spruce Grove.

Second, it is recommended that Enoch Cree Nation and areas south of Enoch Cree Nation, east of Highway 60, and north of the North Saskatchewan River be moved into the new electoral division of Edmonton-West-Enoch. This balances population in this area, reflects these communities' link to the City of Edmonton, and enables the creation of the new electoral division of Edmonton-West-Enoch.

Third, it is recommended that areas south of Highway 16 and north of Stony Plain be moved into this electoral division from Lac Ste. Anne-Parkland to reflect this area's comparative connection to Stony Plain rather than Lac Ste. Anne-Parkland.

Fourth, and related and subject to the foregoing, it is recommended that all other areas of Parkland County in Drayton Valley-Devon be moved to Lac Ste. Anne-Parkland, with the exception of those east of Range Road 12 (if north of Highway 627) or Range Road 10 (if south of Highway 627). This helps balance populations between Stony Plain-Drayton Valley-Devon and Lac Ste. Anne-Parkland and unites the vast majority of Parkland County in Lac Ste. Anne-Parkland.

Finally, it is recommended that the following areas, some of which are presently in Drayton Valley-Devon, be moved to Leduc-Beaumont: areas east of Highway 795 if south of Township Road 500, but excluding all of the Town of Calmar, and east of Highway 60 if north of Township Road 500. These areas use Leduc as a service centre much more than Drayton Valley or Stony Plain. Moving them to Leduc unites them with their county seat and balances population between the electoral divisions. To the extent that areas in Leduc County west of that line are presently in Maskwacis-Wetaskiwin, it is recommended that they be moved to Stony-Plain-Drayton Valley-Devon, to balance population in the electoral divisions, mitigate the divisions of Leduc County, and keep Wetaskiwin-Maskwacis-Ponoka as a union of two counties.

In sum, the proposed electoral division of Drayton Valley-Devon brings together Brazeau County, parts of Leduc and Parkland Counties, and the towns of Stony Plain, Drayton Valley, and Devon.

These are numerous communities of interest southwest of Edmonton. It is similar, if notably different, from the present Drayton Valley-Devon. Its population is extremely close to the provincial average. Effective representation will continue.

Strathcona-Sherwood Park

It is recommended that the boundaries of the electoral division of Strathcona-Sherwood Park be as shown on Map 85, resulting in a population of 57,429.

The Commission acknowledges the desirability of the current boundaries, being: a) the Hamlet of Sherwood Park south of Highway 16 if east of Clover Bar Road; and b) Strathcona County south of Highway 16. This contentment is shared by most submissions such as those of William Cook.

However, due to population growth in Beaumont and Leduc, the Commission is recommending that the eastern part of Beaumont, east of 50 Street, be added to this electoral division, along with portions of Leduc County east of Beaumont, north of Highway 625, and west of Highway 21, to connect the portions of Beaumont with the remainder of the electoral division.

To balance population based on this change, it is recommended that areas of Sherwood Park presently in Strathcona-Sherwood Park be moved into Sherwood Park if they are north of Foxhaven Park/Heritage Hills Wetland and south of Baseline Road. It is further recommended that Sherwood Park absorb areas west of Clover Bar Road that have been added to the USA of Sherwood Park since the last redistribution.

This electoral division reflects the interests of Sherwood Park, Beaumont, and connected portions of adjacent counties. This will be a vehicle for effective representation. The population is well within statutory and constitutional limits.

Sylvan Lake-Innisfail (Innisfail-Sylvan Lake)

It is recommended that the boundaries of the electoral division of Sylvan Lake-Innisfail be as shown on Map 86, resulting in a population of 55,904.

This electoral division is largely based on the current electoral division of Innisfail-Sylvan Lake, but three changes have been made.

First, and most consequentially, it is recommended that all portions of Red Deer County presently in Rimbey-Rocky Mountain House-Sundre be moved to Sylvan Lake-Innisfail. This enables the elimination of Rimbey-Rocky Mountain House-Sundre and unites all of Red Deer County (excluding the City of Red Deer) in a single electoral division.

Second, areas north of Sylvan Lake, west of Highway 20, south of Township Road 400 (also known as Rainy Creek Road), and east of Range Road 30 are also recommended for inclusion from Rimbey-Rocky Mountain House-Sundre. These areas are not in Red Deer County but are very connected to the Town of Sylvan Lake, and effective representation warrants them being included in this electoral division.

Third, a small amount of territory has been moved to Red Deer-North to reflect the annexation of this territory by the City of Red Deer.

In sum, this electoral division unites all of the County of Red Deer and connected areas north of Sylvan Lake in a single electoral division with a population that will certainly lead to effective representation.

It is recommended that this electoral division be named Sylvan Lake-Innisfail, to reflect Sylvan Lake's status as the larger municipality.

Vermilion-Lloydminster-Wainwright

It is recommended that the boundaries of the electoral division of Vermilion-Lloydminster-Wainwright be as shown on Map 87, resulting in a population of 48,473. The borders of this proposed electoral division are very similar to its current borders. The only material proposed change is to add portions of the County of Minburn east of Highway 881 from Fort Saskatchewan-Vegreville. This helps balance the population between the two electoral divisions, and was suggested by Linda Jacejko on behalf of a constituency association. Moreover, despite living in the County of Minburn, these individuals are more likely to receive services from Vermilion than Vegreville.

Though somewhat lower than the average population, this remains well within statutory and constitutional limits. Its lower-than-average population is justified given the rural nature of the electoral division provided. It logically brings together the Counties of Lloydminster and Wainwright, including all constituent towns, and adjacent portions of the County of Minburn. Effective representation will continue.

In the final report, the Commission will likely recommend that this electoral division be renamed Lloydminster-Wainwright, reflecting the practice of placing the largest municipality within an electoral division first in the electoral division's name. It has kept the current name for the time being.

West Yellowhead

It is recommended that the boundaries of the electoral division of West Yellowhead be as shown on Map 88, resulting in a population of 49,455.

This bears significant similarities to the current version of the electoral division, though areas have been added and subtracted. Portions of the electoral division in Jasper National Park, including the Municipality of Jasper, are recommended for removal to Banff-Jasper, for reasons noted in the discussion of Banff-Jasper. However, all areas of Yellowhead and Woodlands County not presently in the electoral division are recommended for inclusion to make up for the population lost to Banff-Jasper, as well as to unite the two counties. Finally, it is recommended that the southern portion of Big Lakes County currently in Athabasca-Barrhead-Westlock, including the Town of Swan Hills, be moved to West Yellowhead to increase West Yellowhead's population and because of changes elsewhere in the north of the province rendering West Yellowhead the most appropriate location for the Town of Swan Hills.

Effective representation will result from these borders, which essentially build on the current West Yellowhead, but unite two counties that had previously been divided. The towns of Grande Cache, Hinton, Edson, and Whitecourt are connected via major roads. Though the population variance is relatively large, that is justifiable considering the vast geography. The electoral division cascading north makes this a quasi-northern electoral division, helping representation for Northern Alberta.

Wetaskiwin-Maskwacis-Ponoka (Maskwacis-Wetaskiwin)

It is recommended that the boundaries of the electoral division of Wetaskiwin-Maskwacis-Ponoka be as shown on Map 89, resulting in a population of 56,995.

This electoral division consists of the entirety of the Wetaskiwin and Ponoka Counties, including all cities and towns therein.

In other words, compared to the present Maskwacis-Wetaskiwin, this electoral division has taken portions of Wetaskiwin and Ponoka Counties from Lacombe-Ponoka and Rimbey-Rocky Mountain-Sundre. These changes unite the counties, balance populations, and enable the elimination of Rimbey-Rocky Mountain House-Sundre.

Compared to the current Maskwacis-Wetaskiwin, the electoral division has lost:

- Portions of Beaver and Camrose Counties, which are recommended for inclusion in Camrose to unite the counties; and
- Portions of Leduc County in the current Maskwacis-Wetaskiwin and Drayton Valley-Devon, which are divided between Leduc-Beaumont, Strathcona-Sherwood Park, Stony Plain-Drayton-Valley-Devon, and Camrose, to balance populations in this area of the province.

This electoral division lends itself to effective representation. By bringing together two counties that are adjacent to each other on the Highway 2 corridor in rural Alberta, the MLA will be able to represent common interests and clear borders. The advantages of the clear borders warrant the slightly higher-than-average population.

APPENDIX A

Location and Date Summary — First Round of Public Hearings

Location and Date Summary
1. Pincher Creek, May 29
2. Lethbridge, May 29
3. Edmonton (South), June 2
4. Edmonton (North/Central), June 3
5. Westlock, June 4
6. St. Paul, June 5
7. Wainwright, June 5
8. Drumheller, June 9
9. Calgary (NW), June 10
10. Calgary (NE), June 11
11. Brooks, June 12
12. Medicine Hat, June 13
13. Fort McMurray, June 16
14. Peace River, June 17
15. Grande Prairie, June 17
16. Slave Lake, June 18
17. Hinton, June 19
18. Red Deer, June 19
19. Virtual, June 23

APPENDIX B

List of Submitters — First Round of Written Submissions

Submitter Name	Affiliation
Rick Anderson	Private Citizen
Aaron Holmes	Private Citizen
Kevin Smith	Private Citizen
Neal Gray	Private Citizen
Herman Friesen	Private Citizen
Dino Cavalić	Private Citizen
Margaret Ireland	Private Citizen
Tyler Cook	Private Citizen
Joan M Kent	Private Citizen
Sarah Zagoda	Private Citizen
Tim Court	Private Citizen
Jennifer Johnson	MLA for Lacombe-Ponoka
Mary Bourke	Private Citizen
Heather MacLeod	Private Citizen
Eric Ruppel	Private Citizen
Susan Larson Lessard	Private Citizen
Shelley Schmidtke	Private Citizen
Jessica Post	Private Citizen
Eileen Reppenhagen	Private Citizen
Louise Poirier-McCoy	Private Citizen
Kyle Dorchester	Private Citizen
Stuart Cruikshank	Private Citizen
Brenda Davidson	Private Citizen
Deborah Dean	Private Citizen
Clifford Wood	Private Citizen
Kim Magnuson	Private Citizen
Chris Hollingworth	Private Citizen
Monica Zyla	Private Citizen
Karen Schoenbrunn	Private Citizen
Sukhwant Sidhu	Private Citizen
Anthony Imbrogno	Private Citizen
Ronald Yule	President, Nose Creek Preservation Society
Paul Buhler	Private Citizen
Harchand Toor	Private Citizen
Quinnlan Boser	Private Citizen
Joseph Brown	Private Citizen
Aoun Khan	Private Citizen
Lisa Cumming	Private Citizen

Submitter Name	Affiliation
Marc Lapierre	Private Citizen
Susan Vukadinovic	Private Citizen
Rebecca Brown	Private Citizen
Mary Bourke	Private Citizen
John Middleton-Hope	Private Citizen
John Usher	Private Citizen
Ethan Williams	Private Citizen
Elizabeth Aitken	Private Citizen
Jeffrey Garn	Private Citizen
Karl Hauch	Private Citizen
Tom Ikert	Private Citizen
Krista Hamilton	Private Citizen
Stacey Vanderveen	Private Citizen
Hon. Rob Renner	Former MLA for Medicine Hat
Loren Montgomery	Private Citizen
Dominik Kaiser	Private Citizen
Elaine Manzer	Mayor of Peace River
Stanley Sakamoto	Private Citizen
Susan Sakamoto	Private Citizen
Gwendoline Dirk	Private Citizen
Danika Wolkow	Private Citizen
Dave Galasso	Private Citizen
Claude Laflamme	Private Citizen
David Carter	Former Speaker and MLA for Calgary-Millican and Calgary-Egmont
Margaret Semel	Private Citizen
Hon. Searle Turton	MLA for Spruce Grove-Stony Plain
Mary O'Neill	Private Citizen
Glenn van Dijken	MLA for Athabasca-Barrhead-Westlock
Kathleen Mary Dietrich	Private Citizen
Kim Large	Private Citizen
Myrna Nerbas	Private Citizen
Ashley Large	Private Citizen
Lisa St. Jean	Private Citizen
David Cloutier	Private Citizen
Charmaine Wood	Private Citizen
Jennifer Williams	Private Citizen
Michael Radziwon	Private Citizen
Maria Dusevic	Private Citizen
Lorelei Harasem	Private Citizen
Tom Rooke	Private Citizen
Ed Dick	Private Citizen
Ed Fredeen	Private Citizen

Submitter Name	Affiliation
Ross Watson	Private Citizen
Jean Peterson	Private Citizen
Justin Acton	Private Citizen
Glenn Walmsley	Private Citizen
Ryan Yeats	Private Citizen
Sherry Perley	Private Citizen
Brandon Luntz	MLA for Leduc-Beaumont
Max Amerongen	Private Citizen
Soha Ahmad	Private Citizen
Lyndsey Henderson	Private Citizen
Judi Trelenberg	Private Citizen
Barbara Ivens	Private Citizen
Catherine Roy	Private Citizen
David Howard	Private Citizen
Rob Cormier	Private Citizen
Anna Fiddler-Berteig	Private Citizen
Jeff Baird	Private Citizen
Ellen Nygaard	Private Citizen
Scott Cyr	MLA for Bonnyville-Cold Lake-St. Paul
Deniene Patriquin	Private Citizen
Lisa Reis	Deputy Mayor of Coaldale
Braedon McNicol	Private Citizen
Becky Scott	Private Citizen
Allan Pugh	Private Citizen
Kym Porter	Private Citizen
Dynelle Dunn	Private Citizen
Michelle Sauve	Private Citizen
Lola Jean Stewart	Private Citizen
Daniel Meller	Private Citizen
Sean Dunn	Private Citizen
Alan James MacFadyen	Private Citizen
Lawrence Alexander	Private Citizen
Terence Field	Private Citizen
Robert Woolf	President, Coaldale Chamber of Commerce
Naomi Bell	Private Citizen
Ross Buchholz	Private Citizen
Marion E. Jones	Private Citizen
Ronald Dyck	Private Citizen
Lisa Lambert	Private Citizen
Adam Singer	Private Citizen
Anastasia Sereda	Private Citizen
Sheila Stacey	Private Citizen

Submitter Name	Affiliation
Brent Bartlett	Private Citizen
William van Engen	Private Citizen
Andrew Traynor	Private Citizen
Scott Paul	Private Citizen
Barb Phillips	Private Citizen
Scot Hutton	Chief Administrative Officer, Fort McKay First Nation
Michele Veldhoen	Private Citizen
Nicole Goehring	MLA for Edmonton-Castle Downs
Jillian Creech	Private Citizen
James Seller	Private Citizen
Vladimir Pasek	Private Citizen
Al Duerr	Former Mayor of Calgary
Craig Coburn	Professor, University of Lethbridge
Uduak Godwin	Private Citizen
Janice Tye	Private Citizen
Alexander Shevalier	President, Calgary and District Labour Council
Megan Stewart	Grant Writer and Intergovernmental Affairs, City of Airdrie
Hon. Nathan Neudorf	MLA for Lethbridge-East
Michele Meier	Private Citizen
Cameron Mills	Deputy Chief Administrative Officer, Town of Coaldale
Hon. David Eggen	MLA for Edmonton-North West
Jeanette McDonald	Private Citizen
Jeff Acker	Mayor of Spruce Grove
Kalen Hastings	Chief Administrative Officer, Town of Coaldale
Marg Chaba	Private Citizen
Robert Wanner	Former MLA for Medicine Hat
Olga Barcelo	Private Citizen
Brenda Ives	Private Citizen
Donald Seebeck	Private Citizen
Greg Mady	President, Edmonton and District Labour Council
Jonathan Breitkreuz	Private Citizen
Patricia McGrath	President, St. Albert NDP Constituency Association
Gil McGowan	President, Alberta Federation of Labour
Amy Durand	Private Citizen
Dennis Schmidt	Private Citizen
Luanne Metz	MLA for Calgary-Varsity
Keren Teng	Edmonton City Councillor for Ward Karhiio
Nagwan Al-Guneid	MLA for Calgary-Glenmore
Patricia McFarlane	Private Citizen
Kinza Barney	Chief Administrative Officer, Town of Crossfield
Julia Hayter	MLA for Calgary-Edgemont
Kelli Taylor	Private Citizen

Submitter Name	Affiliation
Michael Janz	Edmonton City Councillor for Ward Papastew
Bill Tonita	President, Alberta New Democrats
Sanjeev Kad	President, Calgary-West UCP Constituency Association
Mariana Mejia Salazar	Vice-president External, Students' Association of Mount Royal University
Claude Stevenson	Private Citizen
Donna Staszewski	Private Citizen
Hans Smits	Private Citizen
Frank Frey	Private Citizen
William Cook	Private Citizen
Ryan Barker	Private Citizen
Ian Gray	Private Citizen
Samuel Juru	Private Citizen
Katherine Joosse	Private Citizen
Rowan Ley	Private Citizen
Stephanie Laflamme	Private Citizen
Peter Laudenkios	Private Citizen
Robert Nelson	Private Citizen
Andrea Ferriss	Private Citizen
Marc Slingerland	Private Citizen
Marle Roberts	Private Citizen
Clifford Reed	Private Citizen
John Borrowman	Private Citizen
Chris Robinson	Private Citizen
Bob Marshall	Reeve, County of Grande Prairie No. 1
Viviana Lartiga	Private Citizen
Colin Kunzli	Private Citizen
Laura Cunningham-Shpeley	Executive Director, Edmonton Federation of Community Leagues
Laveryne Green	Private Citizen
Spencer Patterson	Private Citizen
Cheryl Probert	President, Downtown Edmonton Community League
Jenn Parsonage	President, Edmonton Federation of Community Leagues
Shaminder Parmar	Private Citizen

APPENDIX C

List of Presenters — First Round of Public Hearings

Location and Date	Name	Organization
Pincher Creek, May 29	Craig Burrows-Johnson	Private Citizen
Pincher Creek, May 29	Monica Zyla	Private Citizen
Lethbridge, May 29	Drew Adamick	Private Citizen
Lethbridge, May 29	Randy Bullock	Reeve, County of Cardston
Lethbridge, May 29	Jeff Coffman	Private Citizen
Lethbridge, May 29	Belinda Crowson	Private Citizen
Lethbridge, May 29	Jeffrey Deurloo	Private Citizen
Lethbridge, May 29	Maria Fitzpatrick	Private Citizen
Lethbridge, May 29	Keith Gardner	Private Citizen
Lethbridge, May 29	Cheryl Meheden	Private Citizen
Lethbridge, May 29	Cameron Mills	Private Citizen
Lethbridge, May 29	Tamara Miyanaga	Reeve, Municipal District of Taber
Lethbridge, May 29	Rob Miyashiro	MLA, Lethbridge-West
Lethbridge, May 29	Scott Paul	Private Citizen
Lethbridge, May 29	Ken Sears	Private Citizen
Edmonton, June 2	Jasvir Deol	MLA, Edmonton-Meadows
Edmonton, June 2	Neal Gray	Private Citizen
Edmonton, June 2	Jennifer Klimek	Private Citizen
Edmonton, June 2	Cori Longo	Private Citizen
Edmonton, June 2	Dale Todd Sikorski	Private Citizen
Edmonton, June 2	Searle Turton	MLA, Spruce Grove-Stony Plain
Edmonton, June 2	Roxanne Carr	Private Citizen
Edmonton, June 2	Kerry Day	Private Citizen
Edmonton, June 2	Cynthia Fedor	Private Citizen
Edmonton, June 2	Charles Gachnang	Private Citizen
Edmonton, June 2	Christina Gray	MLA, Edmonton-Mill Woods
Edmonton, June 2	Terry Howlett	Private Citizen
Edmonton, June 2	Nam Kular	Private Citizen
Edmonton, June 2	Neil Singh	Private Citizen
Edmonton, June 2	Charlayne Bozak	Private Citizen
Edmonton, June 2	Jodi Calahoo Stonehouse	MLA, Edmonton-Rutherford
Edmonton, June 2	Harpreet Grewal	Private Citizen
Edmonton, June 2	Robert Jarman	Private Citizen
Edmonton, June 2	Leigh Makarewicz	Private Citizen
Edmonton, June 2	Lloyd Osler	Private Citizen
Edmonton, June 2	Bob Paterson	Private Citizen
Edmonton, June 2	Rakhi Pancholi	MLA, Edmonton-Whitemud

Edmonton, June 2	Stephen Raitz	Private Citizen
Edmonton, June 2	Karen Stix	Private Citizen
Edmonton, June 2	Elizabeth Strange	Private Citizen
Edmonton, June 3	Ben Acquaye	Private Citizen
Edmonton, June 3	Sarah Hoffman	MLA, Edmonton-Glenora
Edmonton, June 3	Nathan Ip	MLA, Edmonton-South West
Edmonton, June 3	Audrey Johnson-McGillis	Private Citizen
Edmonton, June 3	Kyle Kasawski	MLA, Sherwood Park
Edmonton, June 3	Ben Kroeker	Private Citizen
Edmonton, June 3	Laura Paquette	Private Citizen
Edmonton, June 3	Victoria Pearson	Private Citizen
Edmonton, June 3	David Shepherd	MLA, Edmonton-City Centre
Edmonton, June 3	Stephen Smith	Private Citizen
Edmonton, June 3	Hans Smits	Private Citizen
Edmonton, June 3	Priya Usman	Private Citizen
Edmonton, June 3	Brooks Arcand-Paul	MLA, Edmonton-West Henday
Edmonton, June 3	David Eggen	MLA, Edmonton-North West
Edmonton, June 3	Dave Hardman	Private Citizen
Edmonton, June 3	John Kolkman	Private Citizen
Edmonton, June 3	Bobbi-Sue Menard	Private Citizen
Edmonton, June 3	Aaron Paquette	Councillor, Edmonton City Council
Edmonton, June 3	Nathan Poon	Private Citizen
Edmonton, June 3	Peggy Wright	MLA, Edmonton-Beverly-Clareview
Edmonton, June 3	Ruth Yanor	Private Citizen
Edmonton, June 3	Abdul Abbasi	Private Citizen
Edmonton, June 3	Maria Briones	Private Citizen
Edmonton, June 3	Paul Briones	Private Citizen
Edmonton, June 3	Calan Hobbs	Private Citizen
Edmonton, June 3	Susan Jubb	Private Citizen
Edmonton, June 3	Jarrad Marthaller	Private Citizen
Edmonton, June 3	Chantal McKenzie	Private Citizen
Edmonton, June 3	Abel Savard	Private Citizen
Edmonton, June 3	Susan Shaw	Private Citizen
Edmonton, June 3	Heather Sweet	MLA, Edmonton-Manning
Edmonton, June 3	Lesley Thompson	Private Citizen
Edmonton, June 3	Andrew Traynor	Private Citizen
Edmonton, June 3	Carolyn Walker	Private Citizen
Westlock, June 4	Joe Blakeman	Reeve, County of Lac Ste. Anne
Westlock, June 4	Karen Doidge	Private Citizen
Westlock, June 4	Nick Gelych	Deputy Reeve, County of Lac Ste. Anne
Westlock, June 4	Heather Stocking	Private Citizen

Westlock, June 4	Landen Tischer	Private Citizen
Westlock, June 4	Glenn van Dijken	MLA, Athabasca-Barrhead-Westlock
St. Paul, June 5	Josh Crick	Councillor, Municipal District of Bonnyville
St. Paul, June 5	Scott Cyr	MLA, Bonnyville-Cold Lake-St. Paul
Wainwright, June 5	Linda Jacejko	President, Vermilion-Lloydminster-Wainwright Constituency Association
Wainwright, June 5	Michael Jacejko	Private Citizen
Drumheller, June 9	Brian Golka	Private Citizen
Drumheller, June 9	Adrian Zinck	Private Citizen
Calgary, June 10	Michael Doyle	Private Citizen
Calgary, June 10	Sarah Elmeligi	MLA, Banff-Kananaskis
Calgary, June 10	Janet Eremenko	MLA, Calgary-Currie
Calgary, June 10	Linda Goold	Private Citizen
Calgary, June 10	Samir Kayande	MLA, Calgary-Elbow
Calgary, June 10	Julia Law	Vice-president External, Students' Union, University of Calgary
Calgary, June 10	Allison Leonhardt	Private Citizen
Calgary, June 10	Ruben Nelson	Private Citizen
Calgary, June 10	Gordon Paynter	Private Citizen
Calgary, June 10	Alexander Shevalier	President, Calgary & District Labour Council
Calgary, June 10	Joan Stauffer	Private Citizen
Calgary, June 10	Kevin Van Koughnett	Private Citizen
Calgary, June 10	Ross Watson	Private Citizen
Calgary, June 10	Kathleen Ganley	MLA, Calgary-Mountain View
Calgary, June 10	Angela Grace	Private Citizen
Calgary, June 10	Tala Abu Hayyaneh	President, Students' Association of Mount Royal University
Calgary, June 10	Marty Heeg	Private Citizen
Calgary, June 10	Bernadett Maxwell	Private Citizen
Calgary, June 10	Lorraine Moulding	Private Citizen
Calgary, June 10	Daniel Nelles	Chair, City of Airdrie Library Board, and Secretary, Airdrie Arts and Culture Council
Calgary, June 10	Michael Parker	Private Citizen
Calgary, June 10	Julie Pithers	Private Citizen
Calgary, June 10	Jim Ridley	Private Citizen
Calgary, June 10	Irfan Sabir	MLA, Calgary-Bhullar-McCall
Calgary, June 10	Mariana Mejia Salazar	Vice-president External, Students' Association of Mount Royal University
Calgary, June 10	Marcia Cormier	Private Citizen
Calgary, June 10	Jaret Hargreaves	Private Citizen
Calgary, June 10	Jeremy Hexham	Private Citizen

Calgary, June 10	Mike Horembala	Private Citizen
Calgary, June 10	Jayne Martin	Private Citizen
Calgary, June 11	Pranav Bakaraju	Constituency Assistant, Calgary-Foothills
Calgary, June 11	Gurinder Brar	MLA, Calgary-North East
Calgary, June 11	Deborah Dean	Private Citizen
Calgary, June 11	Anita McDonald	Private Citizen
Calgary, June 11	Keith Purdy	Private Citizen
Calgary, June 11	Lizette Tejada	MLA, Calgary-Klein
Calgary, June 11	Court Ellingson	MLA, Calgary-Foothills
Calgary, June 11	David Howard	Private Citizen
Calgary, June 11	Craig Hutchenreuther	Private Citizen
Calgary, June 11	Brian Malkinson	Private Citizen
Calgary, June 11	Miriam Obst	Private Citizen
Calgary, June 11	Andrew Stewart	Private Citizen
Calgary, June 11	Dale Wascherol	Private Citizen
Calgary, June 11	David Cloutier	Private Citizen
Calgary, June 11	Neelam Naz	Private Citizen
Calgary, June 11	Lorraine Robinson	President, Millican Ogden Community Association
Calgary, June 11	Ian Walker	Private Citizen
Calgary, June 11	Mary-Anne Williams	Private Citizen
Brooks, June 12	Arno Doerksen	Reeve, County of Newell
Brooks, June 12	Norman Gerestein	Private Citizen
Brooks, June 12	Dan Hein	Private Citizen
Brooks, June 12	Stacey Vanderveen	Private Citizen
Medicine Hat, June 13	Jim Black	Private Citizen
Medicine Hat, June 13	Gilles Blouin	Private Citizen
Medicine Hat, June 13	Griffin Bray	Private Citizen
Medicine Hat, June 13	David Carter	Private Citizen
Medicine Hat, June 13	Darlene Dee	Private Citizen
Medicine Hat, June 13	Jim Horsman	Private Citizen
Medicine Hat, June 13	Donald B. Knudsen	Private Citizen
Medicine Hat, June 13	Rob Renner	Private Citizen
Medicine Hat, June 13	Marle Roberts	Private Citizen
Medicine Hat, June 13	Stanley Sakamoto	Private Citizen
Medicine Hat, June 13	Holly Turnbull	Private Citizen
Medicine Hat, June 13	Bob Wanner	Private Citizen
Fort McMurray, June 16	Vaughn Jessome	Constituency Assistant, Fort McMurray-Lac La Biche and Fort McMurray-Wood Buffalo
Fort McMurray, June 16	Byron Kessler	Private Citizen
Fort McMurray, June 16	Rene Wells	Private Citizen

Peace River, June 17	Angela Cobick	Constituency Assistant, Peace River
Peace River, June 17	Carolyn Kolebaba	Councillor, County of Northern Sunrise
Peace River, June 17	Art Laurin	Deputy Reeve, County of Northern Sunrise
Peace River, June 17	Gaylene Whitehead	Councillor, County of Northern Sunrise
Peace River, June 17	Corinna Williams	Reeve, County of Northern Sunrise
Grande Prairie, June 17	Bob Marshall	Reeve, County of Grande Prairie No. 1
Slave Lake, June 18	Mike Skrynyk	President, Lesser Slave Lake UCP Constituency Association
Slave Lake, June 18	Ken Vanderwell	Vice-president, Lesser Slave Lake UCP Constituency Association
Hinton, June 19	Linda Brown	Private Citizen
Hinton, June 19	Bernie Kreiner	Private Citizen
Hinton, June 19	Wendy Robinson	Private Citizen
Red Deer, June 19	Laverne Green	Private Citizen
Red Deer, June 19	Heath Gudmundson	Private Citizen
Red Deer, June 19	Bradley Hodcraft	Private Citizen
Red Deer, June 19	Jody Mercier-Layden	Private Citizen
Virtual, June 23	Diana Batten	MLA, Calgary-Acadia
Virtual, June 23	Chris Dovey	Private Citizen
Virtual, June 23	Linda Ensley	Private Citizen
Virtual, June 23	Leona Esau	Intergovernmental Liaison, City of Airdrie
Virtual, June 23	Andrew Knack	Councillor, City of Edmonton
Virtual, June 23	Danielle Larivee	Private Citizen
Virtual, June 23	Barry Morishita	Private Citizen
Virtual, June 23	Al Olsen	Private Citizen
Virtual, June 23	Christopher Spearman	Private Citizen
Virtual, June 23	Megan Stewart	Grant Writer and Intergovernmental Affairs, City of Airdrie
Virtual, June 23	Patricia Williams	Private Citizen
Virtual, June 23	Justin Wright	MLA, Cypress-Medicine Hat
Virtual, June 23	Malcolm Adams	Private Citizen
Virtual, June 23	Gian-Carlo Carra	Councillor, City of Calgary
Virtual, June 23	David Carpenter	Private Citizen
Virtual, June 23	Amanda Chapman	MLA, Calgary-Beddington
Virtual, June 23	Paul McLaughlin	Reeve and Division IV Councillor, County of Ponoka
Virtual, June 23	Trevor Sloan	Private Citizen
Virtual, June 23	Courtney Walcott	Councillor, City of Calgary
Virtual, June 23	Wendy Whitehouse	Private Citizen

APPENDIX D

History of Alberta's Electoral Boundaries Commissions

The Canadian Context

Until the middle of the 20th century, Canadian Legislatures – both federal and provincial – handled all reapportionment of their electoral boundaries.

At the federal level, all-party parliamentary committees were eventually tasked with drawing new electoral maps after each decennial census. In the 1950s and 1960s, due to a series of minority governments in Ottawa, a set of redistricting principles began to emerge. These principles provided a check on the governing party and gave a voice to opposition and minority parties. These principles included:

- county and municipal lines would be used where possible;
- seats of party leaders would be left untouched;
- new electoral divisions would be placed in areas of greatest population growth;
- urban ridings would contain more residents than rural ridings (often by a factor of two to one); and
- where practical, ridings would be drawn according to population.

In the 1950s and 1960s, the task of redistribution of boundaries was taken out of the hands of Legislatures and given to independent commissions. Manitoba took the lead in 1955, establishing a commission that comprised the Chief Justice of Manitoba, the Chief Electoral Officer of the province, and the President of the University of Manitoba. The enabling legislation instructed the Commission to draw boundaries considering:

- communities of interest;
- means of communication and transportation;
- natural features of the province; and
- municipal boundaries and other similar factors.

The Commission was also instructed to distinguish between urban and rural ridings, with urban districts to contain *seven* voters for every *four* rural voters. This provision was amended in 1968 to allow for a permitted variation of +25% to -25% of the average voting population in each riding.

In the 1960s, independent commissions were established by Parliament for federal electoral districts within each province. Manitoba was a model for the federal Parliament. The politics of minority governments helped pave the way for these independent commissions. The government of Prime Minister John Diefenbaker had promised an independent electoral commission to deal with boundaries if his government was re-elected in 1962. After the election his government had proposed a resolution for an independent commission and presented a bill at first reading. Parliament dissolved and the bill died. While Diefenbaker won re-election in 1962, his government lasted only months before losing the 1963 election and was replaced by a minority government led by Prime Minister Lester B. Pearson.

A nonpartisan consensus for election reform was established by the minority Pearson government in passing the *Electoral Boundaries Readjustment Act* of 1964. Following the Manitoba model, the federal Act did not require strict voter parity or “one person, one vote” but allowed ridings to vary by +25% to -25% of the average. Unlike the Manitoba law, Ottawa’s Act did not distinguish between urban and rural ridings. The independent commissions established for each province by the federal law were instructed to consider the following factors:

- geography;
- demographics;
- community interests; and
- social and economic concerns.

The federal model of 1964, along with the Manitoba example, influenced all Canadian provinces to establish similar independent Electoral Boundary Commissions. The success of the independent commissions at the federal level and provincial level has made them a permanent fixture on the Canadian political scene.

The history of democratic rights in Canada no doubt laid the groundwork for constitutionally entrenched rights in Section 3 of the *Charter of Rights and Freedoms*:

Every citizen of Canada has the right to vote in an election of members of the House of Commons or of a legislative assembly and to be qualified for membership therein.

Alberta's History

Given the historic Canadian context of independent commissions drawing electoral boundaries, it is appropriate to look specifically at Alberta's history.

1960

A provincial election held on June 18, 1959, resulted in a massive majority government for the governing Social Credit Party. They won 61 of the 65 seats. In March 1960, the Legislative Assembly passed a resolution appointing a committee to consider electoral boundaries. The Committee, chaired by Frederick Colborne, MLA, included four other government MLAs, plus the only Progressive Conservative MLA and the only Liberal MLA. The Committee Members represented constituencies from across the province and recommended a new constituency be created in each of the cities of Edmonton and Calgary. It also recommended the elimination of four rural constituencies in Central and Southern Alberta. These recommendations resulted in the unusual net reduction of electoral divisions in the Legislature from 65 to 63. The general election of 1963 was conducted on 63 electoral division boundaries, and it appears that the electoral divisions were expanded to 65 for the 1967 general election.

1968 - 1969

On April 5, 1968, the Legislative Assembly adopted a resolution appointing a special committee of the Legislature, once again headed by Frederick Colborne, MLA, and including five other Social Credit Government MLAs, two Progressive Conservative MLAs, and one Liberal MLA. The Committee studied the process of all other provinces (except for Newfoundland) and the Federal Government in terms of electoral boundary changes. Later in April, this Committee recommended expanding the number of ridings from 65 to 75 and adjusting boundaries to reflect the increase of Alberta's population.

Most significantly, this Committee recommended the future establishment of an "independent commission" to be chaired by a Judge of the Supreme Court of Alberta (or District Court), the Chief Electoral Officer, two government members and two opposition members, and an "independent citizen" appointed by the Speaker, with the concurrence of the Premier and the Leader of the Opposition. This recommendation is the origin of Alberta's current independent Electoral Boundaries Commission. The enumerated voters of the most recent general election were to be the basis for the population in drawing new boundaries. This Committee tabled its report in the Legislative Assembly in April 1969.

1969 - 1970 Electoral Boundary Commission Report

In May 1969, an *Act to Facilitate the Redistribution of Seats in the Legislative Assembly* was enacted. The *Electoral Boundaries Commission Act*, became the first of its kind in Alberta. The members of the Commission established pursuant to this Act are the same as were suggested by the 1968 Legislative Committee, with the addition of the Clerk of the Executive Council.

The independent Electoral Boundaries Commission was appointed in January 1969 prior to the passage of the legislation. The seven-person Commission was chaired by His Honour Judge Samuel Lieberman (District Court of Alberta). The remaining members of the Commission consisted of two government MLAs, two MLAs from the opposition, the Clerk of the Executive Council, and an Albertan jointly nominated by the Premier and the Leader of the Opposition.

Part 2 of the Act included redistribution rules and instructed the Commission to divide the province into 75 electoral divisions. There were to be two kinds of divisions: urban electoral divisions and rural electoral divisions. Section 13 of the Act is as follows:

13. (1) The Commission shall establish one or more proposed electoral divisions in each of the following urban municipalities only:

Calgary
Camrose
Drumheller
Edmonton
Grande Prairie

Lethbridge
Medicine Hat
Red Deer
St. Albert
Wetaskiwin

(2) The number of proposed urban electoral divisions shall be determined by dividing the total voter population of the existing urban electoral divisions by a figure 25 per cent above the average voter population of all the existing electoral divisions, both urban and rural.

(3) The voter population of the community of Sherwood Park shall be included as part of the total voter population of the existing urban electoral divisions for the purposes of subsection (2).

Public hearings held by the Commission after the release of its interim report took place in Edmonton (Legislative Building) and Calgary (J.J. Bowlen Building). All other public hearings in the cities listed in Section 13(1) were held at the local courthouse. An interim report was released on November 21, 1969, and the final report on January 27, 1970.

The Commission wrestled with the proper interpretation of section 13(2) of the Act and interviewed the Chairman of the previous Legislative Committee that recommended the Act. In its report the Commission determined the following:

Section 13(2) of the Act was exhaustively studied by the Commission and it was unanimously agreed that this Section did not accurately reflect the intention of the Committee on Redistribution Procedure or of the Legislature in that it could be applied in the manner that would result in the apportionment of the 75 electoral divisions provided for in Section 12 of the Act into 33 urban electoral divisions and 42 rural electoral divisions.

Rejecting that interpretation of the Act, the Commission recommended 38 urban electoral divisions and 37 rural electoral divisions. The size of the electoral divisions could range from 25% above the average voter population to 25% below that average.

In determining the area to be included in an electoral division, the Commission was to consider the following factors pursuant to Section 21 of the Act:

- (a) the community or diversity of interests of the population;
- (b) the means of communication between the various parts thereof;
- (c) the physical features thereof;
- (d) the sparsity or density of the population; and
- (e) all other similar relevant factors.

1975 - 1976 Electoral Boundaries Commission

In July 1975, a seven-person Commission was appointed, and it was again chaired by The Honourable Justice Samuel Lieberman (now a Justice of the Supreme Court of Alberta). Part way through the Commission's term, Justice Lieberman requested to be relieved of his responsibilities, and he was replaced by The Honourable Judge Tevie H. Miller (District Court of Alberta). The rest of the Commission consisted of two government MLAs, two opposition MLAs, the Clerk of the Legislative Assembly, and an Albertan jointly nominated by the Premier and Leader of the Opposition.

The Commission was directed to add four more electoral divisions, increasing the size of the Legislature from 75 to 79 members. Also, the legislation directed that Calgary receive three additional electoral divisions and Edmonton receive two additional electoral divisions. Areas outside the two major cities were to be reduced by one electoral division.

The proposed new electoral map was drawn up by the Commission and included in their interim report of April 1976 without the benefit of public hearings. The public was invited to comment on the interim report.

The final report of the Commission was issued in November 1976. The total “voter” population of Alberta used by this Commission was 994,158. The average voter population in the urban electoral divisions was approximately twice the size of the average rural electoral division. Once again, the Commission applied the variance of +25% and -25% of the average voter population in each electoral division.

1981 Standing Committee Privileges and Elections, Standing Orders and Printing

A special resolution was passed by the Legislative Assembly in 1981 to deal with the anomaly of growth in the city of Calgary, resulting in single family and multi-family residences being built on the boundary lines dividing electoral divisions in the city of Calgary. The Committee recommended to the Legislative Assembly that the legislation be changed to provide authority to the Chief Electoral Officer to determine, after consultation with returning officers in the electoral divisions, the electoral division in which the voters in the residence shall cast their vote.

1983 - 1984 Electoral Boundaries Commission

In December 1983, a seven-person Commission was appointed and led by the Honourable Justice Russell A. Dixon (Court of Queen's Bench of Alberta). The Commission consisted of two government MLAs, two opposition MLAs, a joint nominee of the Premier and the Leader of the Opposition, and the Chief Electoral Officer of Alberta. The legislation governing the Commission provided for five new urban ridings and one less rural riding, resulting in an overall expansion of additional four electoral divisions. The new total of 83 electoral divisions was divided between 42 urban divisions – in Calgary, Edmonton, Red Deer, Lethbridge, Sherwood Park, St. Albert, and Medicine Hat – and 41 rural divisions. The calculations made by this Commission were based on the total “voter population” of 1,435,752, and again the variance from the average voter population in each electoral division was -25% to +25%. Guidelines for creating electoral divisions included common community or diversity of interests, means of communication, physical features, sparsity or density of population, and other similar or relevant factors to be taken into consideration. The Commission made recommendations to the Legislature outside of its mandate but based on strong public input:

- The Legislature must justify the added costs of increasing the number of electoral divisions to 83 from 79 in light of the comparative representation of other Provinces such as British Columbia, Ontario, and Quebec.

- The need for further study of the urban-rural mix and the need to make electoral boundaries co-terminus with County and Municipal District boundaries wherever possible in the context of making voter representation under Part 2 of the legislation more equitable.
- A new classification of urban-rural electoral division be recognized in the legislation.

The Commission issued an interim report in July 1984 without public hearings. The final report of the Commission was submitted to the Speaker of the Legislature in October 1984. Both reports were unanimous. The general provincial elections of 1986 and 1989 were conducted based on the boundaries recommended by the Dixon Electoral Boundaries Commission.

1989 - 1990 Alberta's Select Special Committee on Electoral Boundaries

In August 1989, the Legislative Assembly passed a motion to appoint a Select Special Committee. The Committee's purpose was to review the electoral boundary process and recommend an updated basis for the effective representation of Albertans. The seven-person Committee consisted of four government MLAs and three opposition MLAs. Two of the MLAs were from Calgary, two from Edmonton, one from southern Alberta, one from central Alberta, and one from northern Alberta.

The purpose of the Committee was to study and make recommendations regarding the *Electoral Boundaries Act*, including the composition of any future commission and the manner in which commissions carried out their responsibilities. The Committee was also asked to review the implications of the *Canadian Charter of Rights and Freedoms*, recent court cases, legislation and practices of other jurisdictions, and make recommendations on how Alberta should draw its electoral boundaries. Finally, the Committee was tasked with considering geography and demographic changes on boundary revisions and how those revisions impact the work of Members of the Legislative Assembly.

The Committee began its meetings in August 1989 and received presentations from various experts and consultants, including lawyers, political scientists, previous EBC Chairmen and members. The Chief Electoral Officer also joined the Committee in an advisory capacity. The Committee held 39 public meetings in 30 locations around the province between November 1989 and March 1990.

The Committee sought input from other provinces and travelled to Winnipeg, Regina, and Victoria to hear from MLAs, Chief Electoral Officers, and Judges who chaired Electoral Boundary Commissions. Comparative data from all 10 provinces and two territories and the Federal Government was gathered and reviewed. The question whether drawing boundaries for electoral divisions should be based on enumerated voters or total population was studied. Types of Electoral Boundary Commissions and the

makeup of those commissions from other jurisdictions was also studied. Guidelines for other provinces' commissions along with exceptions and the need for special ridings, particularly in the North, were examined. Finally, population averages per electoral division were examined. The Committee took its work very seriously and acknowledged the need for a constitutionally sound boundary distribution and demographically responsible plan. The Committee was faced with two competing arguments in the submissions received and the presentations made at public hearings. One side maintained that boundary redistribution should be based on the principle of "one person, one vote"; the other favoured a wide degree of variance from one electoral division to another based on a variety of factors. The Committee characterized the issue in the same way as Chief Justice McLachlin (as she then was) did in *Dixon v Attorney General of British Columbia*, [1989] 4 WWR 393 (BC SC) at 402: "Is the equality of voting power absolute or relative? If it is not absolute, what limits are there on deviation from parity of voting power?"

It must be kept in mind that the Committee was operating in a legal context before the Supreme Court of Canada issued its decision in *Reference Re: Provincial Electoral Boundaries (Saskatchewan)* in June 1991 (also known as *AG Sask v Carter*). The Committee was of the view that recognizing the right to vote, found in Section 3 of the *Charter*, should be understood in the historic Canadian context. The development of Canadian democratic rights must include the history, tradition, and underlying democratic philosophy of Canadian society. The Committee rejected the American policy of "one person, one vote" as antithetical to Canadian history, geography, and practice and not appropriate for Alberta. This coincided with the decision of Chief Justice McLachlin in *Dixon*: "It would be simplistic and wrong to infer, without more, that the Canadian concept of democracy dictates the [American] result. It is vital to recognize that it is Canadian, not American, constitutional history, values and philosophy which must guide this Court . . . It would do our own Constitution a disservice to simply allow the American debate to define the issue for us, all the while ignoring the truly fundamental structural differences between the two Constitutions." (*Dixon v. AG of BC* pp 408-409).

The Committee therefore concluded that it was in fact the right of the Legislature to allow for deviation or variance (like other provinces and the Federal Government) of +25% and -25% of the average. In addition, based on examples of other provinces, there were legitimate instances such as the Far North, where geography and topography justified ridings up to 50% below the average. "The direction then is clear", concluded the Committee. "A Legislature can determine . . . variance." In this, the Committee again defers to Chief Justice McLachlin:

"In recognizing the rights of provincial legislatures on setting these considerations *Dixon* is clear that it is 'not the role of the Courts to decide which factors and

considerations are to be applied to each individual riding . . . this task is within the responsibilities of the Legislature.’”

At the same time, the Committee insisted at page 59 that: “Limits must be clearly stated and reasons for variance must also be stated. This protects districts from having their voting power eroded to unconstitutional limits such as B.C.’s previous system which allowed variances of up 150%.”

The Committee tabled its report in the Legislature in November 1990. A new *Electoral Boundaries Commission Act* was passed in December 1990 based on the recommendations of this report. The new Act provided authority to the Electoral Boundaries Commission to create what has come to be known as “blended” or “hybrid” electoral divisions. This new category had been the subject of a recommendation in the 1984 Final EBC report of Justice Russell A. Dixon. In other words, parts of the cities of Red Deer and Medicine Hat not included in a single municipal electoral division could be joined with part of one or more other municipalities which are rural.

As well, this Committee settled on using total *population* as the basis rather than *enumerated voters* for representation.

Reference re: Order in Council O.C. 91/91 in Respect of the Electoral Boundaries Commission Act, 1991 ABCA 317

Wanting to ensure the constitutional validity of the proposed electoral divisions in the legislation, the Alberta Government in February 1991 referred the matter to the Alberta Court of Appeal, asking if the manner in which the boundaries and areas of electoral divisions as proposed and established under the new Act was consistent with *Canadian Charter of Rights and Freedoms*. The specific questions asked of the Court are as follows:

- (a) Is the manner in which the boundaries and the areas of electoral divisions are proposed and established under the *Electoral Boundaries Commission Act* (c. E-4.01, Statutes of Alberta, 1990), inconsistent with the *Canadian Charter of Rights and Freedoms*; and
- (b) If so, in what particulars and to what extent?

A five-member panel of the Court of Appeal headed by the Honourable Mr. Justice Lieberman delayed argument on this case until after the Supreme Court of Canada decided the *Reference re Provincial Electoral Boundaries (Saskatchewan) Reference*. That case was argued before the Supreme Court of Canada in late April and decided in early June of 1991. Justice Lieberman was the most senior Justice of the panel

and had earlier led the first two Electoral Boundaries Commissions for Alberta. Argument at the Alberta Court of Appeal occurred on September 30, 1991 and the Court's decision on November 21, 1991 answered many of the questions raised by those who objected to the government's proposed legislation. The Court of Appeal provided something of a running commentary on the legislation leading to its conclusion of its constitutional validity. In this regard several paragraphs are worth noting:

[23] We answer in general terms that the manner in which boundaries and areas are proposed and established under the Act seems not to offend s. 3 of the Charter in the sense that the general scheme of the Act is of the sort approved by the Supreme Court of Canada in *Carter*. For the reasons already noted, we can go little further in this case.

[24] We agree with Alberta that the Commission structure and its procedures raise no issue under s. 3 of the Charter, and we offer no further comment about them.

[26] We also accept as reasonable the rule in s. 17 that permits, in five per cent of the districts, a 50 per cent deviation. We think we can take notice that Alberta contains sparsely populated areas that are also a long distance both from other populated areas and the Legislature itself. We think the statutory criteria fairly identify those areas. We note that the five per cent rule will potentially produce four "special" districts for the next election. Nobody came forward to say it was too little or too much, and we infer that it is reasonable. We cannot comment further without the aid of a demographic study.

[27] A special feature of the legislation is what has been called the "hybrid" divisions, the five electoral districts required to be part rural and part urban. The urban areas are specifically named. We are told that they were selected for having some "semi-urban" parts, by which is meant small holdings used partly for residential and partly commercial purposes. Areas like this can indeed be found both in urban and rural municipalities, and it might well be that a careful selection would produce a new community of interest. We accept this as reasonable. We think that most people when they talk about "rural" areas have in mind farming areas, where the bulk of the population, both urban and rural, have a great community of interest: they either work the land or serve those that do. We accept that some non-urban areas today are not like that, and a division of all Alberta into rural and urban tends to be simplistic. And so we accept the reasonableness of "hybrid" areas, but offer no comment about specific areas. [Emphasis added]

[28] We are bound also to say that a rule permitting a 25 per cent deviation does not offend the Charter as an "undue" intrusion upon voter parity. See *Carter* p. 19-20. That case does not, however, mandate the use of that or any deviation in a case where it is not needed. [. . .]

[32] We do accept that some deviations are inevitable because of the geography and demography of Alberta. The province is physically large; its huge natural barriers, whether mountains, rivers, lakes or muskeg, create natural and necessary boundaries; the pattern of settlement created natural ethnic boundaries; and populations in predominately farming regions are declining. Indeed, we have already approved the setting aside of four (of the 40) for the most under-populated and remote areas. And, when the Commission chooses precise boundaries, no doubt other cases of disparity

will arise in order to create “understandable and clear” boundaries. The question remains how we know now that these precise extra numbers are necessary.

The proposed legislation reviewed by the Court of Appeal more fully defined hybrid electoral divisions as multi-municipality ridings in section 15 of the *Electoral Boundaries Commission Act*. Ultimately, the Alberta Court of Appeal answered the reference question that the proposed legislation recommended by the Select Special Committee on Electoral Boundaries did not offend the *Canadian Charter of Rights and Freedoms*.

1991 - 1992 Electoral Boundaries Commission Report

In January 1991 the government appointed a five-person Commission chaired by the Honourable Justice Charles G. Virtue (Court of Queen’s Bench of Alberta), two members nominated by the government, one member nominated by the Official Opposition, and the Chief Electoral Officer. In May 1991 the Commission asked for an extension of their mandate to await the Supreme Court’s decision *Reference re Provincial Electoral Boundaries (Saskatchewan) Reference*. The Legislature extended the time for the Commission’s interim report from September 1991 to on or before December 31, 1991. Chairman Justice Virtue resigned in June 1991 and was replaced by Assistant Chief Judge Clare Liden (Provincial Court of Alberta). An interim report was issued in December 1991, and the final report was issued in May 1992.

No public hearings were held prior to the interim report. The Commission was instructed to draw boundaries for 83 electoral divisions of which 43 were to be single municipality electoral divisions, including 19 in Calgary, 17 in Edmonton, two in Lethbridge, one in each of Medicine Hat, Red Deer, St. Albert, Fort McMurray, and Strathcona/Sherwood Park. The remaining 40 electoral divisions were to be multi-municipality electoral divisions, five of which had to include portions of the cities of Red Deer, Medicine Hat, St. Albert, and two in Grande Prairie, which could incorporate areas of a neighbouring rural municipalities. The other 35 electoral divisions could consist of more than one municipality. Relevant considerations in creating electoral divisions included adherence to the *Canadian Charter of Rights and Freedoms*, sparsity and density of population, common community interests, geographic and road systems, and the need for understandable and clear boundaries. Population was used by the Commission as the basis for redistribution rather than enumerated voters, and the population of individual ridings could range from as high as 25% above the average population and 25% below. The population of Alberta for the purposes of this Commission was 2,554,779, with an electoral division average of 30,780 and allowing for a target range for effective representation of 23,085 to 38,475.

The function of the Commission was to make proposals to the Legislative Assembly as to the area, boundaries, and names of electoral divisions in Alberta. The final report of the Commission resulted in five different reports, one from each member! No majority report was possible. Reasons for the fractious Commission began with problems relative to accurate determination of Alberta's population and evolved to differing perspectives on implementing the term "effective representation" from the recent Supreme Court of Canada decision in *Reference Re: Provincial Electoral Boundaries (AG of Saskatchewan v. Carter)* 1991.

Five disparate reports could not be appropriately used by the Legislature as the basis for new legislation revising electoral boundaries. Accordingly, the Legislature established a further Select Special Committee in July 1992.

1992 Alberta's Select Special Committee on Electoral Boundaries

The Committee was structured similarly to the 1989/1990 Committee, but the Official Opposition refused to participate. That left four government members chaired by Bob Bogle MLA to complete a report recommending electoral division boundary changes. The Committee reported to the Speaker in November 1992 and indicated that the proposed electoral map should be referred to the Alberta Court of Appeal to ensure compliance with the *Charter of Rights and Freedoms*. The population of Alberta used by this Committee was from the 1991 Federal Census (including Indian Reserves and Settlements) and totalled 2,554,779. The 83 electoral divisions consisted of 20 single municipality electoral divisions in Calgary, 18 in Edmonton, two in Lethbridge, one in each of Fort McMurray, Medicine Hat, St. Albert, and Sherwood Park. The remaining 39 electoral divisions consisted of multi-municipality electoral divisions in the rest of the province. The Committee also recommended that four of the 39 electoral divisions outside of the cities be considered as "Special Consideration Electoral Divisions" that met at least three of five criteria in the legislation, which is now codified in Section 15 (2) of the current *Electoral Boundaries Commission Act*.

The Government by way of Order in Council 215/93 referred the Committee's recommended legislation outlining electoral boundaries to the Alberta Court of Appeal pursuant to *Judicature Act*, R.S.A. 1980, c. J-1.

Reference re Electoral Divisions Statutes Amendment Act, 1993 (Alberta)

The Reference questions to the Court of Appeal were as follows:

- (a) Do the boundaries of the electoral divisions established in Part 3 of the *Electoral Divisions Statutes Amendment Act*, 1993 infringe or deny rights or freedoms guaranteed by the *Canadian Charter of Rights and Freedoms*?
- (b) If so, in what particulars?
- (c) If so, is such infringement or denial justified by Section 1 of the *Canadian Charter of Rights and Freedoms*?

The Court stated on October 24, 1994 that there were only three possible solutions to address the disparity between urban voters and rural voters:

- 1. mixing rural and urban voters in electoral divisions of equal size;
- 2. more seats in the Legislature overall; or
- 3. fewer non-urban seats.

The electoral map forwarded by the Committee and referred to by the Court removed the prospect of more electoral divisions under the first option, the proposed concept of hybrid or blended ridings. The Legislature did not add more seats, therefore making the second option impossible. This left the only option being the third, the reduction in rural seats. The Court said that popular democratic opposition to the first two options would not avoid eventual Court-mandated *Charter* compliance. In acknowledging that the one option of more hybrid ridings was taken off the table by the Legislature because of the public opposition, the Court responded as follows:

[62] The Chairman added that “The first priority would be to respect existing constituency boundaries, if possible.” This is, of course, a simple way to assuage the concern of some voters. [. . .]

[64] With respect, this very natural concern of an elected official for the “comfort zone” of a vocal portion of the electorate is not a valid Charter consideration. The essence of a constitutionally entrenched right is that it permits an individual to stand against even a majority of the people. Put another way, Canadians entrenched certain traditional rights for minorities in the Constitution because they do not trust themselves, in all times and circumstances, to respect those rights. The fact, then, that a significant number of Albertans do not like the results of an equal distribution of electoral divisions is no reason to flinch from insisting that they take the burden as well as the benefit of democracy as we know it.

Recognizing that increasing the number of electoral divisions also faces public opposition, the Legislature declined to utilize that option. The Court of Appeal then acknowledged that with two of the options they had originally listed gone, the only option therefore was to approve more rural seats being eliminated. While recognizing the need for judicial restraint the Court opined:

[72] The third, and last, is a reduction in the number of non-urban electoral divisions. But that raises the natural and understandable reluctance of voters in the less populous ridings to accept the “massive surgery” that would be needed to create equity in the absence of an increase in seats. But, if one spurns this solution, none remains.

[73] The people of Alberta must understand that this last is the only solution unless they soften their attitude towards the other two. We re-affirm that popular opposition to “massive surgery” is not a reason to ignore the breach of the right to effective representation by widespread and significant imbalance in voting power.

The Court, again bearing in mind the virtue of judicial restraint, concluded that the government proposal did not rise to the level of *Charter* condemnation. The Court did recognize “that a gradual and steady” change was needed in the evolving practice of amending electoral boundaries in Alberta. The Court countered that unpopularity of options is not a valid factor in assessing whether electoral boundaries are constitutionally valid under the *Charter of Rights and Freedoms*.

1995 - 1996 Alberta Electoral Boundaries Commission

This Commission was established in June 1995 with Chief Judge Edward Wachowich (Provincial Court of Alberta) as Chairman and the Speaker of the Legislature appointing two members nominated by the government and two members nominated by the Official Opposition. Leading up to the interim report, the Commission travelled to 17 communities to hear public presentations over a period of 11 days. After its interim report, the Commission travelled to seven locations and heard public presentations over a period of seven days. This was the first Commission which conducted public hearings before its initial report.

The Commission issued a unanimous report to the Speaker relating to the existing 83 electoral divisions. The Commission added one electoral division to Edmonton and one to Calgary and removed two electoral divisions from the rural areas. The Commission also created two Section 15(2) electoral divisions with populations below 25% of the provincial average.

The population of Alberta used by the Commission was 2,554,779, and a range of population per electoral division was from 23,085 to 38,475 based on an average of 30,780.

The Commission highlighted the need for “gradual and steady” change as stated by the Alberta Court of Appeal. This Commission, because it was the fourth attempt to redistribute boundaries in the province within six years, recognized the public's impatience with the expense and time expended on this task. The Commission fully examined the meaning of effective representation as it relates to functions of the Members of the Legislative Assembly and effective representation from the perspective of regional and community interests within the province. It acknowledged that facilitating effective representation as it relates to regional and community interests in a unicameral Legislative Assembly is a daunting challenge. That challenge warranted something of a dilution of voter parity in a rapidly evolving province.

2002 - 2003 Alberta Electoral Boundaries Commission

The Commission was established in March 2002, and the Alberta Ethics Commissioner Robert C. Clark was appointed as Chairman. The legislation had been amended to allow the chair to be selected from a list of several occupations in addition to that of a judge of any court in Alberta. The Speaker of the Legislature appointed four other Commissioners, being two representatives from the government and two representatives from the opposition. The Commission held a series of public hearings across the province in May and June of 2002 and issued its interim report in September of that year. The Commission briefed itself thoroughly on the legal aspects of effective representation and introduced the “provincial quotient” or the average population and then emphasized that the allowable range for standard electoral divisions would be +25% or -25% of that quotient. In wrestling with the concept of effective representation, the Commission opined that rural ridings are much harder to serve because of the difficulty in transportation and communication and that rural voters make greater demands on their elected representatives. Further, geographic boundaries such as rivers and municipal boundaries form natural community dividing lines. A citizen's vote should not be unduly diluted. It is a practical fact that effective representation cannot adhere strictly to voter parity as absolute voter parity is impossible. This Commission issued its final report in February 2003. They were required to draw boundaries for 83 electoral divisions, and they were to have 41 electoral divisions in the two major cities, Calgary (23) and Edmonton (18), 22 electoral divisions in smaller urbanized locations, 19 rural electoral divisions, and one special electoral division under Section 15 of the Act. Of the electoral divisions outside of Calgary and Edmonton, 14 were multi-municipality or hybrid ridings.

This Commission referenced the fast-growing nature of Alberta's population and stated that by 2030 Alberta's population was expected to be at 4 million people, which has turned out to be a significant underestimate!

This Commission's report was not unanimous. There was one dissenting report which emphasized the need for near-absolute voter parity being the paramount consideration and wanting electoral divisions more like the American model.

2009 - 2010 Electoral Boundaries Commission

This Commission was established in July 2009, and the five-member Commission was chaired by Chief Judge Ernest Walter (Provincial Court of Alberta). The Commission was given a task of redrawing the boundaries for 87 electoral divisions, up from 83. This Commission relied on the 2006 Census for Alberta, which revealed a population of 3,290,350. The electoral division average was therefore 41,888, with an allowable range from 30,660 to 51,100. This Commission summarized the principles of effective representation as follows:

1. Relative parity of voting power.
2. The tradition in Canada of effective representation and not absolute parity as in the United States.
3. The process of achieving effective representation may involve diluting the political force of some votes but not unduly and not without reason, for the balancing of these interests is a delicate one which involves an examination in depth of the social history, geography, and demography of communities in every sense of the word.

In discussing these important principles, the Commission emphasized the challenge of balancing these interests. It is delicate and involves an in-depth examination of the social history, geography, and demography of communities and the province.

The Commission concluded that the 87 electoral divisions should be divided by Calgary receiving 25; Edmonton, 19; and the rest of Alberta, 43; of which 15 were multi-municipality or hybrid. This report was not unanimous. The minority position held that Edmonton should receive two new electoral divisions.

2016 - 2017 Electoral Boundary Commission

This Electoral Boundaries Commission was appointed in October 2016. Chaired by Justice Myra Bielby (Alberta Court of Appeal), the Commission had two representatives from the government and two from the opposition. The Commission issued an interim report in May 2017 and a final report in October 2017. Public hearings were held both before the interim report and the final report. This Commission had to draw boundaries for 87 electoral divisions, and the population of Alberta according to the 2016 Census was 4,071,875, providing a provincial average of 46,803 per electoral division and a target range for effective representation of between 35,102 and 58,503. The Commission added one new electoral division to Calgary, one new electoral division to Edmonton, and one new electoral division on the west side of Calgary for Airdrie and Cochrane. To make room for these new electoral divisions, four divisions in northeast Alberta were collapsed into three, five in central-west Alberta were collapsed into four, and seven in the southern part of the province were collapsed into six. This Commission took great pains to avoid blended ridings whenever possible. It had one minority voice who was of the view that effective representation did not require such a serious reduction in rural electoral divisions.

Highlights from the History of Alberta's Electoral Boundary Commissions

- The change from eligible voter population to total population based on the most recent decennial census occurred as a result of the Select Special Committee's report of 1990.
- Introduction of hybrid or blended electoral divisions originated with the 1985 Dixon EBC in a recommendation to the Legislature.
- The Alberta Court of Appeal in both the 1991 and 1994 References held that hybrid electoral divisions were the only plausible option to avoid taking away seats from rural Alberta in the absence of expanding the Legislature.
- The practice of public hearings in advance of the "interim report" of an Electoral Boundary Commission began in 1995.
- The number of Alberta's electoral divisions from 1959 to the present changed as follows:

1959: 65

1963: 63

1967: 65

1971 and 1975: 75

1979 and 1982: 79

1986, 1989, 1993, 1997, 2001, 2004, and 2008: 83

2012, 2015, 2019, and 2023: 87

2027: 89

- There clearly has been a constant decline of rural (i.e., non-Calgary, non-Edmonton) electoral divisions over the past 70 years. This is obviously not without warrant. However, the province has drastically changed such that it no longer can be simply classified as “Calgary, Edmonton, and the rest of Alberta.”
- The obvious change in Alberta moving away from a strict binary society of “urban vs. rural” was recognized by the Court of Appeal in 1991. That situation is intensely magnified in 2025. The Court’s anticipated “gradual and steady” use of the third option (hybrid) to achieve effective representation is long past due.
- Of the eight independent Electoral Boundaries Commissions appointed by the Lieutenant Governor and the Speaker of the Legislature, five of those have been led by Section 96 (Federally appointed) judges, two by provincial court judges, and one by the provincial ethics commissioner
- Albertans must constantly be reminded of the differences between the Canadian principle of *effective representation* and the very different policy choice of Americans. Neither Alberta nor any other part of Canada has ever adopted a strict, or anything close to strict, “one person, one vote” model. Effective representation is the goal.

APPENDIX E

Population of Each Electoral Division and Variance from Provincial Average

EDMONTON

Electoral division	Population	Variance from Prov Average
Edmonton-Highlands-Norwood	49,995	-9.0%
Edmonton-South East	52,888	-3.7%
Edmonton-Meadows	53,318	-2.9%
Edmonton-Ellerslie	53,376	-2.8%
Edmonton-City Centre	54,041	-1.6%
Edmonton-Strathcona	54,093	-1.5%
Edmonton-South West	54,136	-1.4%
Edmonton-Beverly-Clareview	54,440	-0.9%
Edmonton-Gold Bar	54,981	+0.1%
Edmonton-Whitemud	56,752	+3.3%
Edmonton-West-Enoch	56,894	+3.6%
Edmonton-South	57,522	+4.7%
Edmonton-Rutherford	58,082	+5.7%
Edmonton-Decore	58,182	+5.9%
Edmonton-Castle Downs	59,612	+8.5%
Edmonton-Mill Woods	59,673	+8.6%
Edmonton-Manning	59,719	+8.7%
Edmonton-North West	61,226	+11.5%
Edmonton-Glenora-Riverview	61,705	+12.3%
Edmonton-West Henday	61,775	+12.5%
Edmonton-McClung	61,859	+12.6%
<i>Edmonton Average</i>	<i>56,870</i>	<i>+3.5%</i>

CALGARY

Electoral Division	Population	Variance from Prov Average
Calgary-Klein	49,666	-9.6%
Calgary-Hays	52,111	-5.1%
Calgary-Lougheed	52,241	-4.9%
Calgary-North West	52,488	-4.4%
Calgary-South East	53,551	-2.5%
Calgary-West-Elbow Valley	54,167	-1.4%
Calgary-Buffalo	54,243	-1.2%
Calgary-Mountain View	54,396	-1.0%
Calgary-North East	54,541	-0.7%
Calgary-Foothills	54,797	-0.2%
Calgary-Bow	54,981	+0.1%
Calgary-Edgemont	55,141	+0.4%

Calgary-Elbow	55,141	+0.4%
Calgary-Nose Creek	55,155	+0.4%
Calgary-Cross	55,617	+1.3%
Calgary-Beddington	56,024	+2.0%
Calgary-Falconridge	56,052	+2.0%
Calgary-Confluence	56,902	+3.6%
Calgary-Glenmore	56,917	+3.6%
Calgary-Varsity	57,166	+4.1%
Calgary-East	57,359	+4.4%
Calgary-Shaw	57,612	+4.9%
Calgary-Acadia	57,620	+4.9%
Calgary-North	57,945	+5.5%
Calgary-Currie	58,111	+5.8%
Calgary-Peigan	58,546	+6.6%
Calgary-Fish Creek	60,044	+9.3%
Calgary-Bhullar-McCall	60,835	+10.8%
<i>Calgary Average</i>	<i>55,692</i>	<i>+1.4%</i>

Note: This chart does not consider Calgary-Okotoks a “Calgary” electoral division as the majority of the electoral division is outside of Calgary.

THE RURAL CENTRAL AND THE RURAL SOUTH

Electoral Division	Population	Variance from Prov Average
Adjacent-to-Calgary		
Airdrie-West	48,145	-12.4%
Airdrie-East	53,952	-1.8%
Chestermere-Strathmore	54,859	-0.1%
Cochrane-Springbank	56,487	+2.8%
Calgary-Okotoks	58,327	+6.2%
<i>Adjacent-to-Calgary Average</i>	<i>54,354</i>	<i>-1.06%</i>
Rural South		
Drumheller-Stettler	42,179	-23.2%
Lethbridge-West	53,937	-1.8%
Medicine Hat-Cypress	54,144	-1.4%
Medicine Hat-Brooks	54,898	-0.1%
Cardston-Taber-Warner	54,933	+0.0%
High River-Vulcan	56,029	+2.0%
Lethbridge-East	57,463	+4.6%
Livingstone-Macleod	60,036	+9.3%
<i>Rural South Average</i>	<i>54,202</i>	<i>-1.3%</i>
Rural Central		
Vermilion-Lloydminster-Wainwright	48,473	-11.8%
Banff-Jasper	53,527	-2.6%
Lacombe-Rocky Mountain House	53,580	-2.5%
Red Deer-North	53,798	-2.1%
Camrose	54,542	-0.7%
Stony Plain-Drayton Valley-Devon	55,066	-0.2%
Sylvan Lake-Innisfail	55,904	+1.8%

Mountain View-Kneehill	56,378	+2.6%
Wetaskiwin-Maskwacis-Ponoka	56,995	+3.8%
Fort Saskatchewan-Vegreville	57,287	+4.3%
Red Deer-South	59,123	+7.6%
<i>Rural Central Average</i>	<i>54,970</i>	<i>+0.07%</i>
Adjacent-to-Edmonton		
St. Albert	53,130	-3.3%
Spruce Grove	53,505	-2.6%
St. Albert-Sturgeon	53,936	-1.8%
Sherwood Park	55,284	+0.6%
Strathcona-Sherwood Park	57,429	+4.6%
Leduc-Beaumont	57,548	+4.8%
<i>Adjacent-to-Edmonton Average</i>	<i>55,139</i>	<i>+0.38%</i>
<i>Non-Calgary, Non-Edmonton Average Excluding 10 Northernmost Electoral Divisions</i>	<i>54,696</i>	<i>-0.45%</i>

The North		
Mackenzie	39,072	-28.9%
Slave Lake-Westlock-Athabasca	46,076	-16.1%
Fort McMurray-Wood Buffalo	46,721	-14.9%
Fort McMurray-Lac La Biche	47,304	-13.9%
Peace River-Notley	48,602	-11.5%
West Yellowhead	49,455	-10.0%
Grande Prairie	50,352	-8.3%
Lac Ste. Anne-Parkland	54,524	-0.7%
Bonnyville-Cold Lake-St. Paul	55,809	+1.6%
Grande Prairie-Wapiti	56,276	+2.5%
<i>Northern Average</i>	<i>49,419</i>	<i>-10.0%</i>

APPENDIX F

Definition and List of Hybrid Electoral Divisions

Definition of hybrid electoral division

Electoral division that contains:

- a) (part of) one of Alberta's cities (Airdrie, Beaumont, Brooks, Calgary, Camrose, Chestermere, Cold Lake, Edmonton, Fort McMurray, Fort Saskatchewan, Grande Prairie, Lacombe, Leduc, Lethbridge, Lloydminster, Medicine Hat, Red Deer, Spruce Grove, St. Albert, Wetaskiwin); and
- b) location outside a city.

The following chart illustrates hybrid electoral divisions:

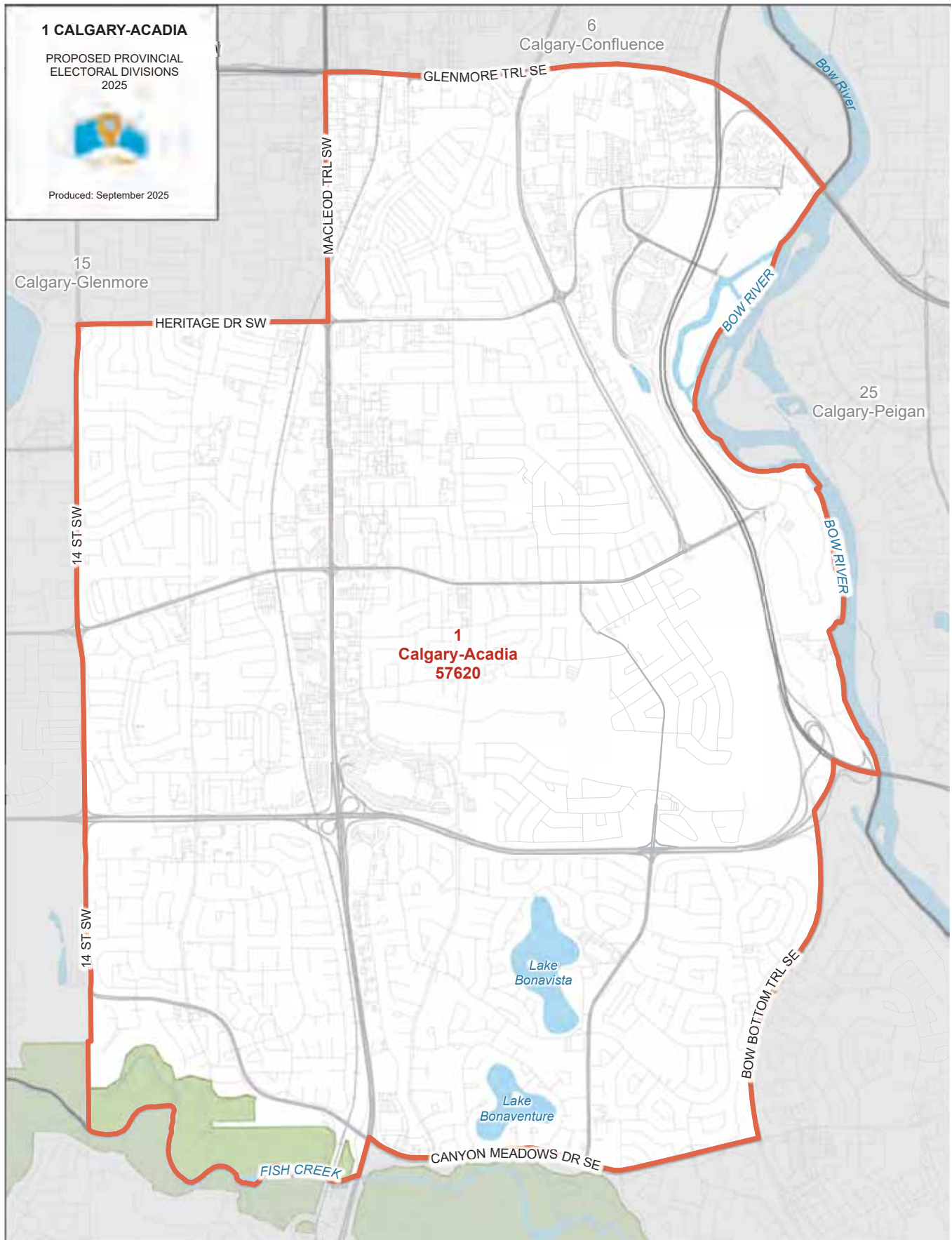
Current Hybrid Electoral Divisions	Proposed Hybrid Electoral Divisions
1. Airdrie-Cochrane	1. Airdrie-West
2. Airdrie-East	2. Airdrie-East
3. Fort McMurray-Lac La Biche	3. Fort McMurray-Lac La Biche
4. Fort McMurray-Wood Buffalo	4. Fort McMurray-Wood Buffalo
5. Brooks-Medicine Hat	5. Medicine Hat-Brooks
6. Cypress-Medicine Hat	6. Medicine Hat-Cypress
7. Leduc-Beaumont	7. Leduc-Beaumont
8. Fort Saskatchewan-Vegreville	8. Fort Saskatchewan-Vegreville
9. Grande Prairie-Wapiti	9. Grande Prairie-Wapiti
10. Lacombe-Ponoka	10. Lacombe-Rocky Mountain House
11. Vermilion-Lloydminster-Wainwright	11. Vermilion-Lloydminster-Wainwright
12. Morinville-St. Albert	12. St. Albert-Sturgeon
13. Chestermere-Strathmore	13. Chestermere-Strathmore
14. Camrose	14. Camrose
15. Bonnyville-Cold Lake-St. Paul	15. Bonnyville-Cold Lake-St. Paul
16. Spruce Grove-Stony Plain	16. Spruce Grove
17. Maskwacis-Wetaskiwin	17. Wetaskiwin-Maskwacis-Ponoka
18. Grande Prairie	18. Grande Prairie
	19. Calgary-Cross
	20. Calgary-West-Elbow Valley
	21. Calgary-Okotoks
	22. Edmonton-West-Enoch
	23. Strathcona-Sherwood Park

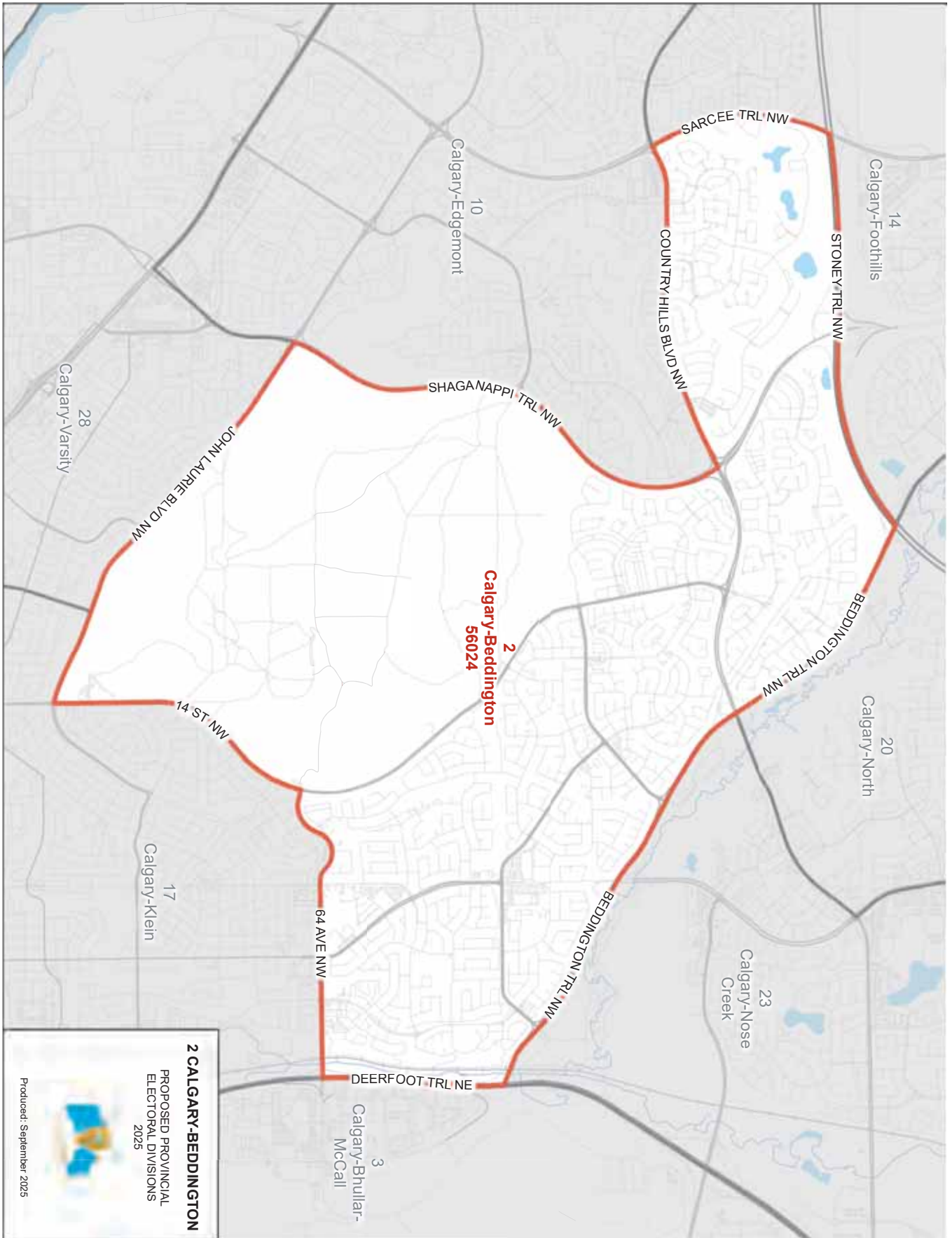
It should be noted that:

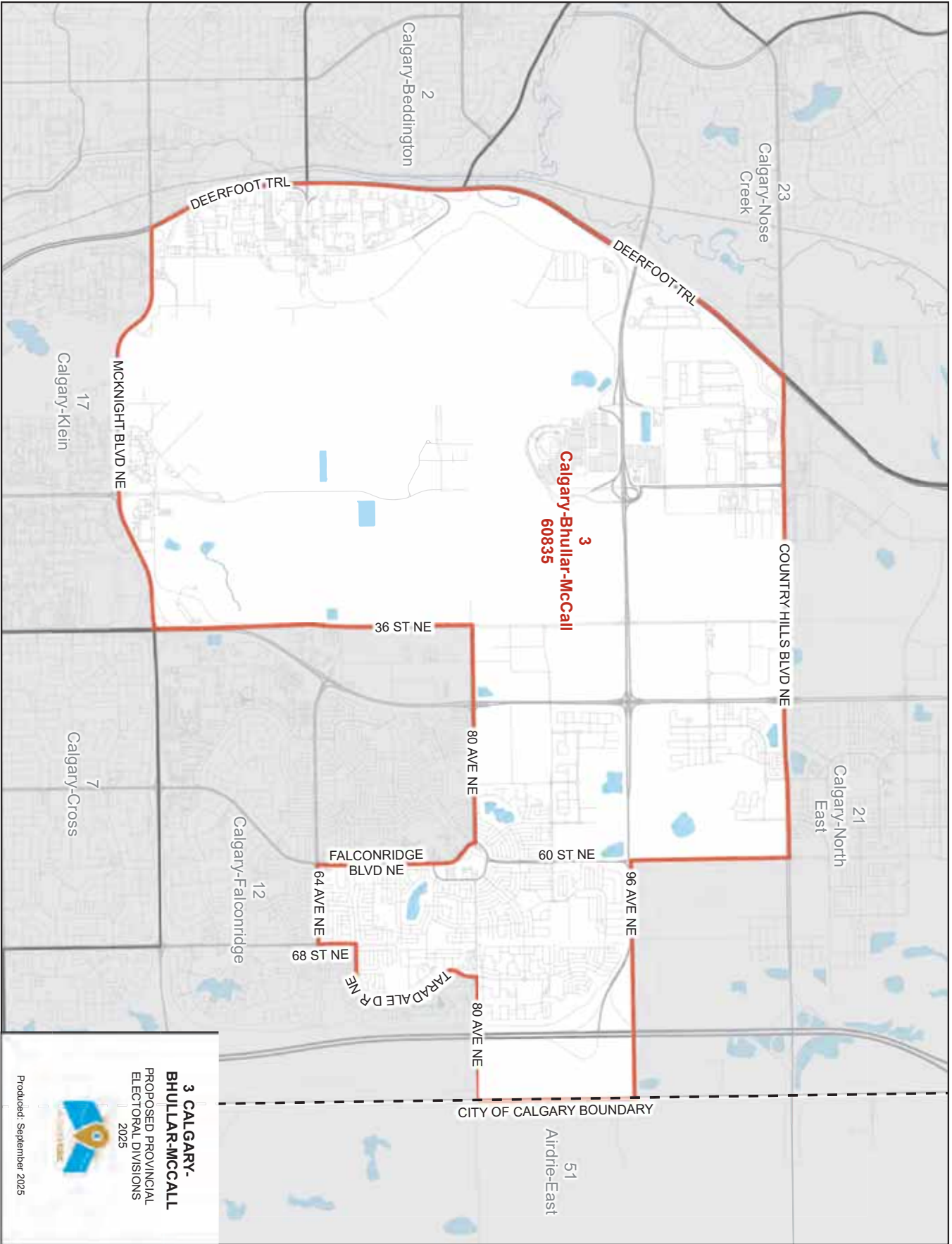
- 1. The electoral divisions in green are divisions where the cities are large enough that they do not *have* to share territory outside their city (at least to the extent that they do).
- 2. Spruce Grove-Stony Plain is in red because it was an unusual outlier. The present electoral division includes the entirety of the City of Spruce Grove, the Town of Stony Plain, and nothing else. It does not include any truly “rural” areas. It meets the letter of our definition, but arguably not the spirit.
- 3. The electoral divisions appear beside their successor electoral divisions on the chart for ease of comparison.

APPENDIX G:

89 Maps of Recommended Electoral Divisions



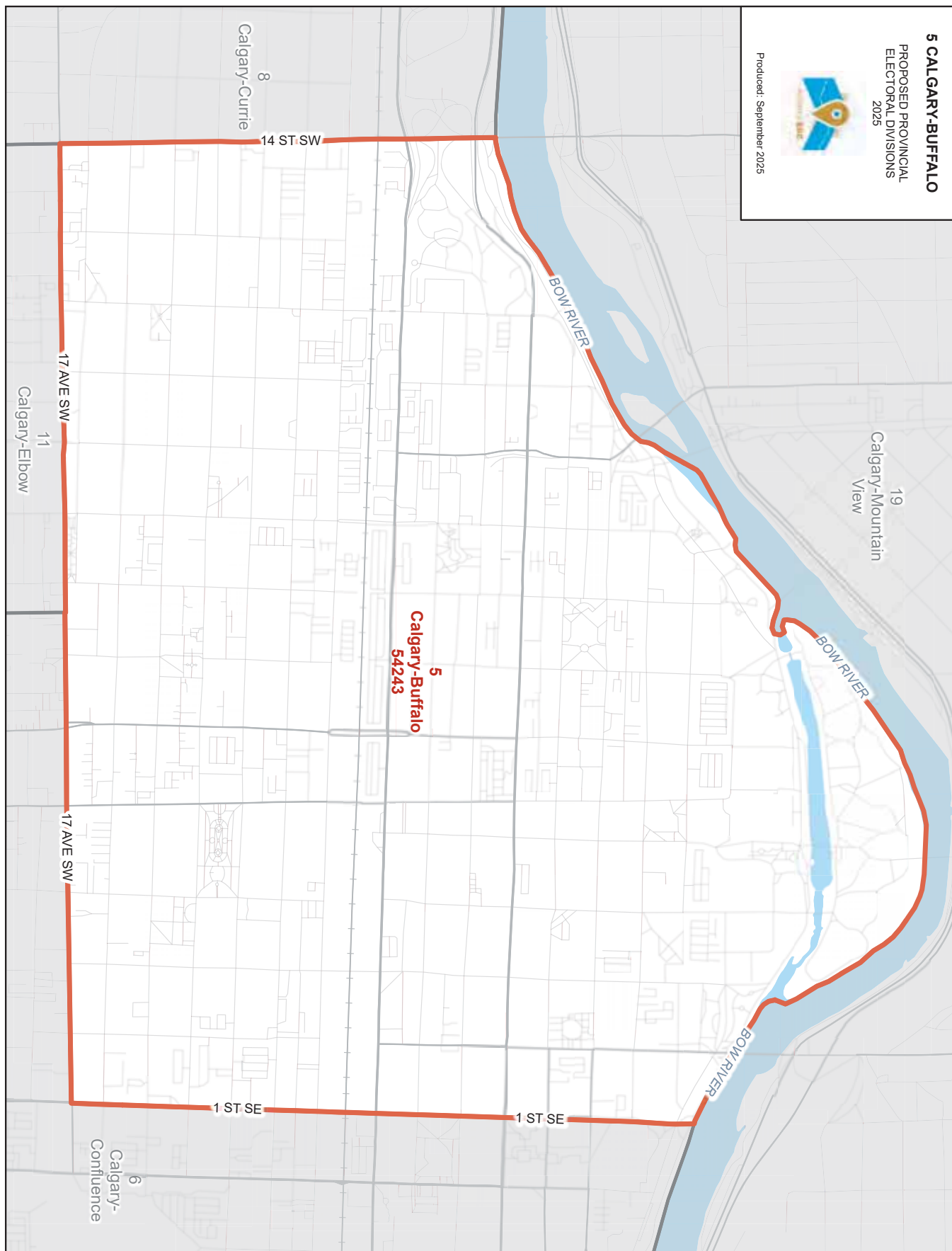


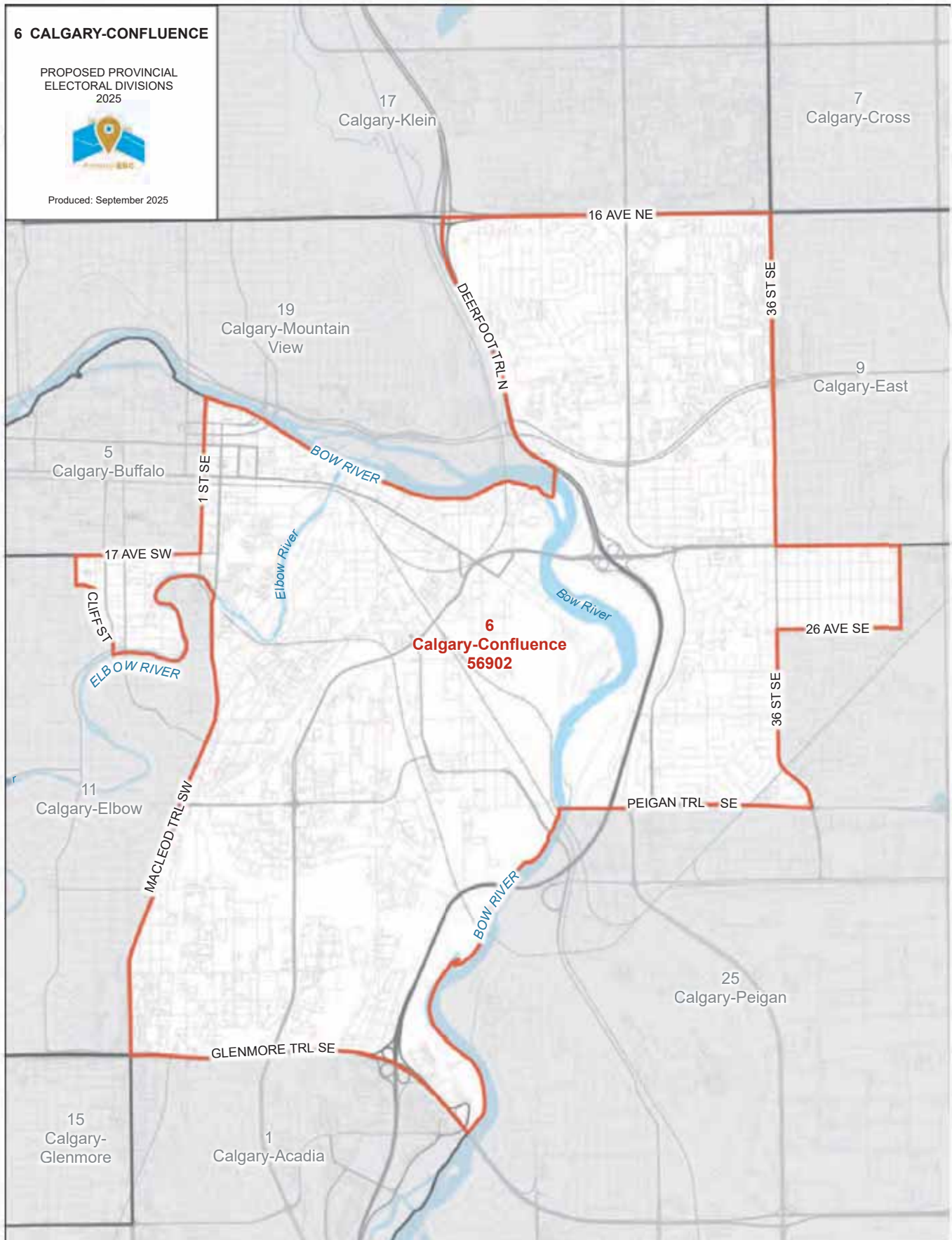


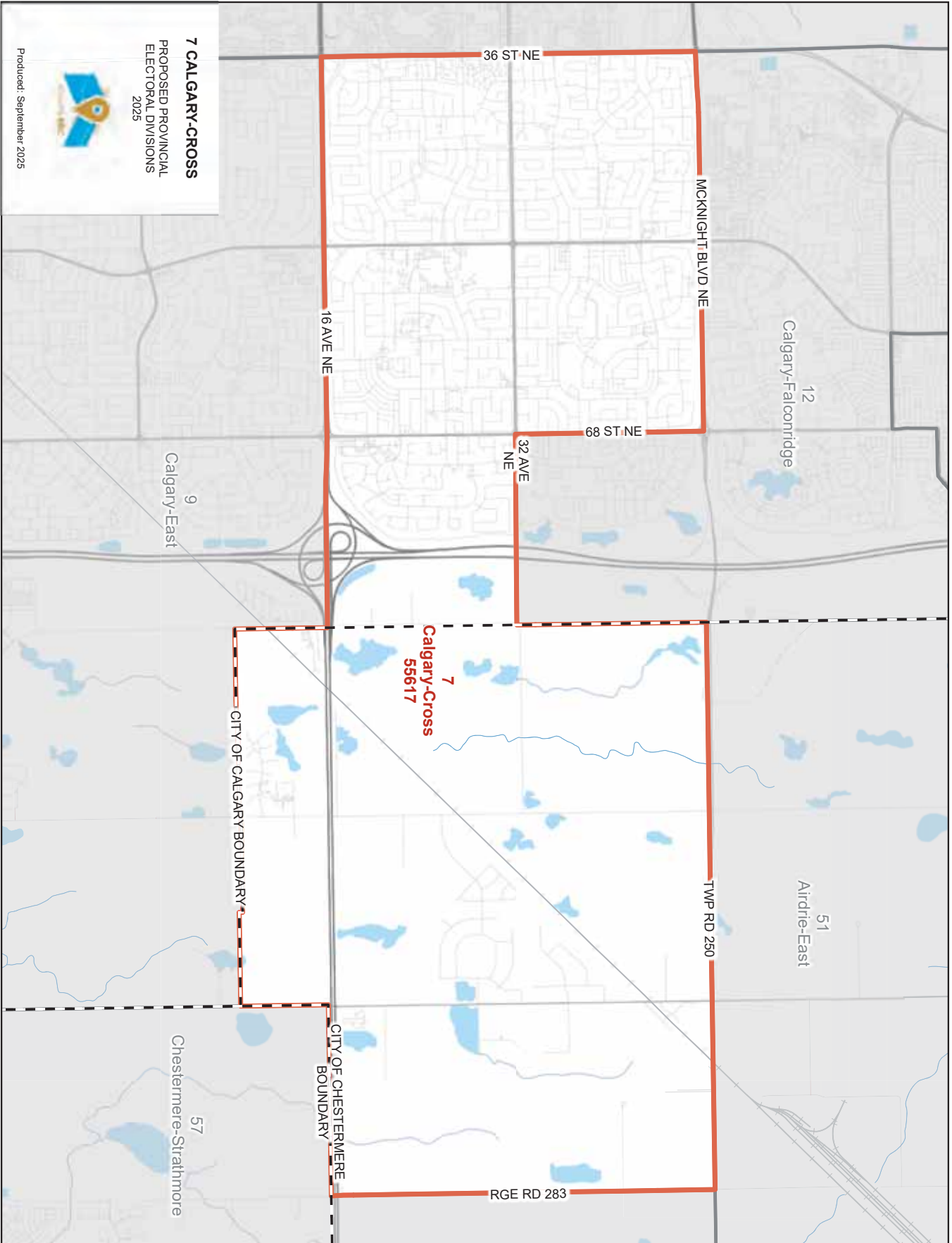
5 CALGARY-BUFFALO
 PROPOSED PROVINCIAL
 ELECTORAL DIVISIONS
 2025

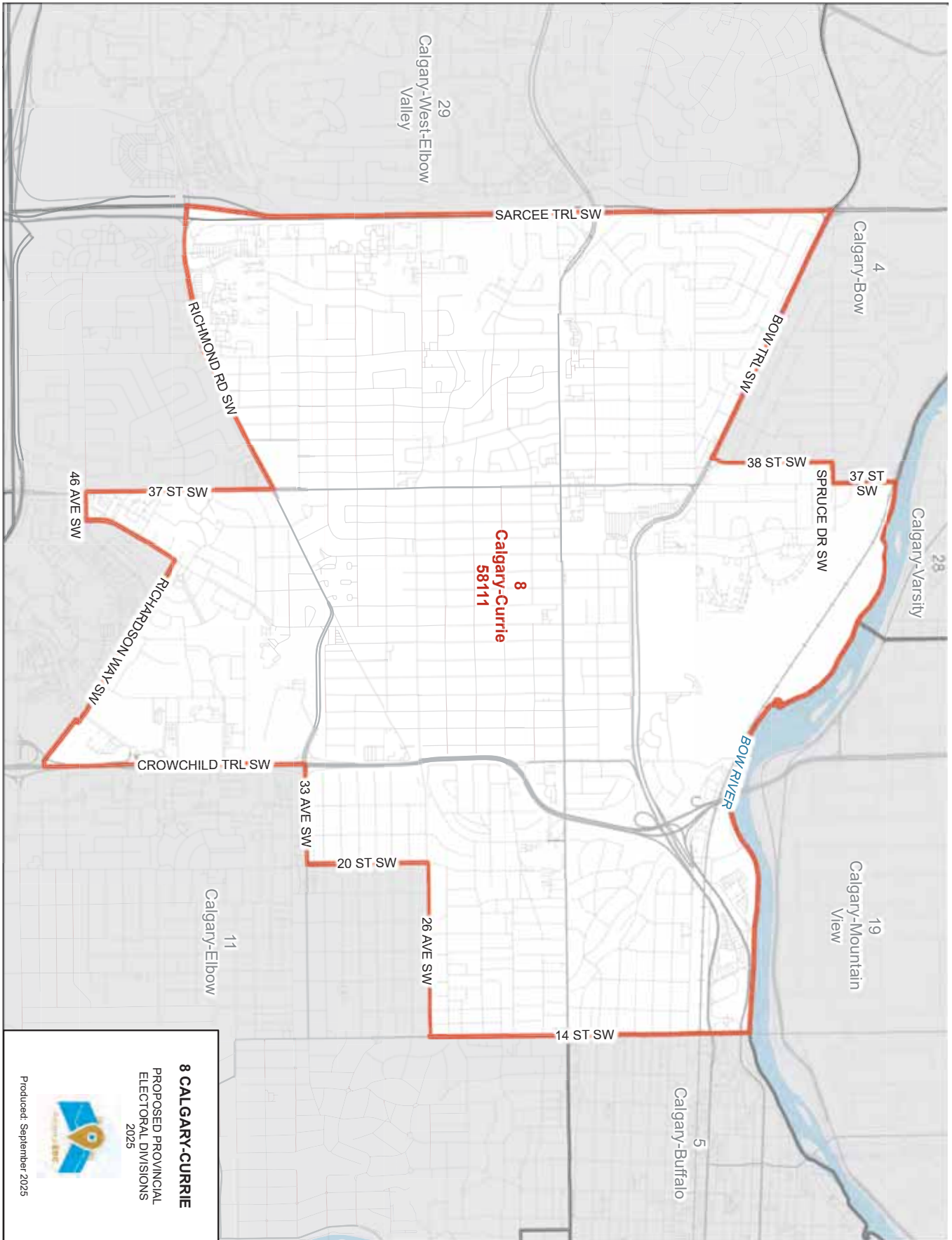


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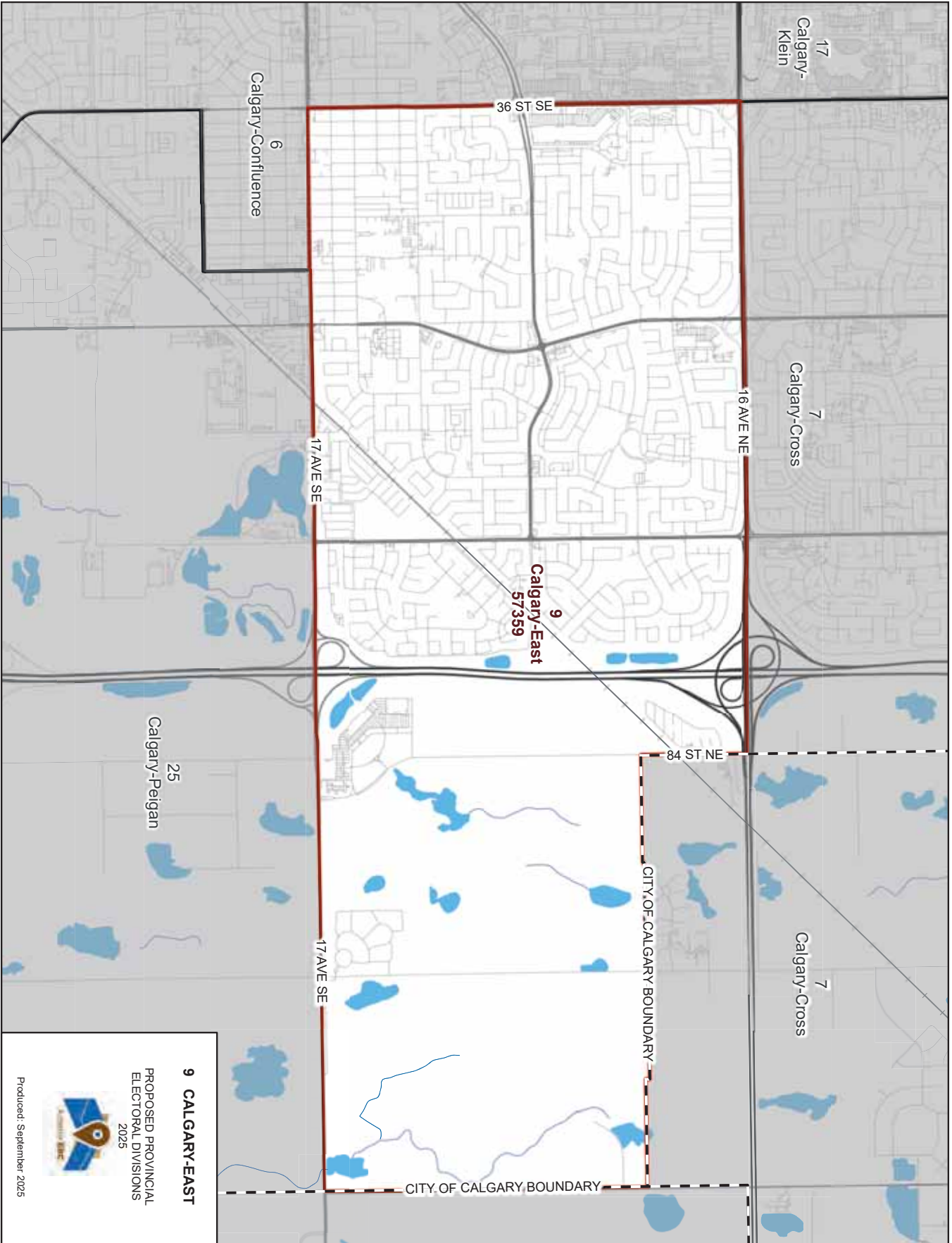


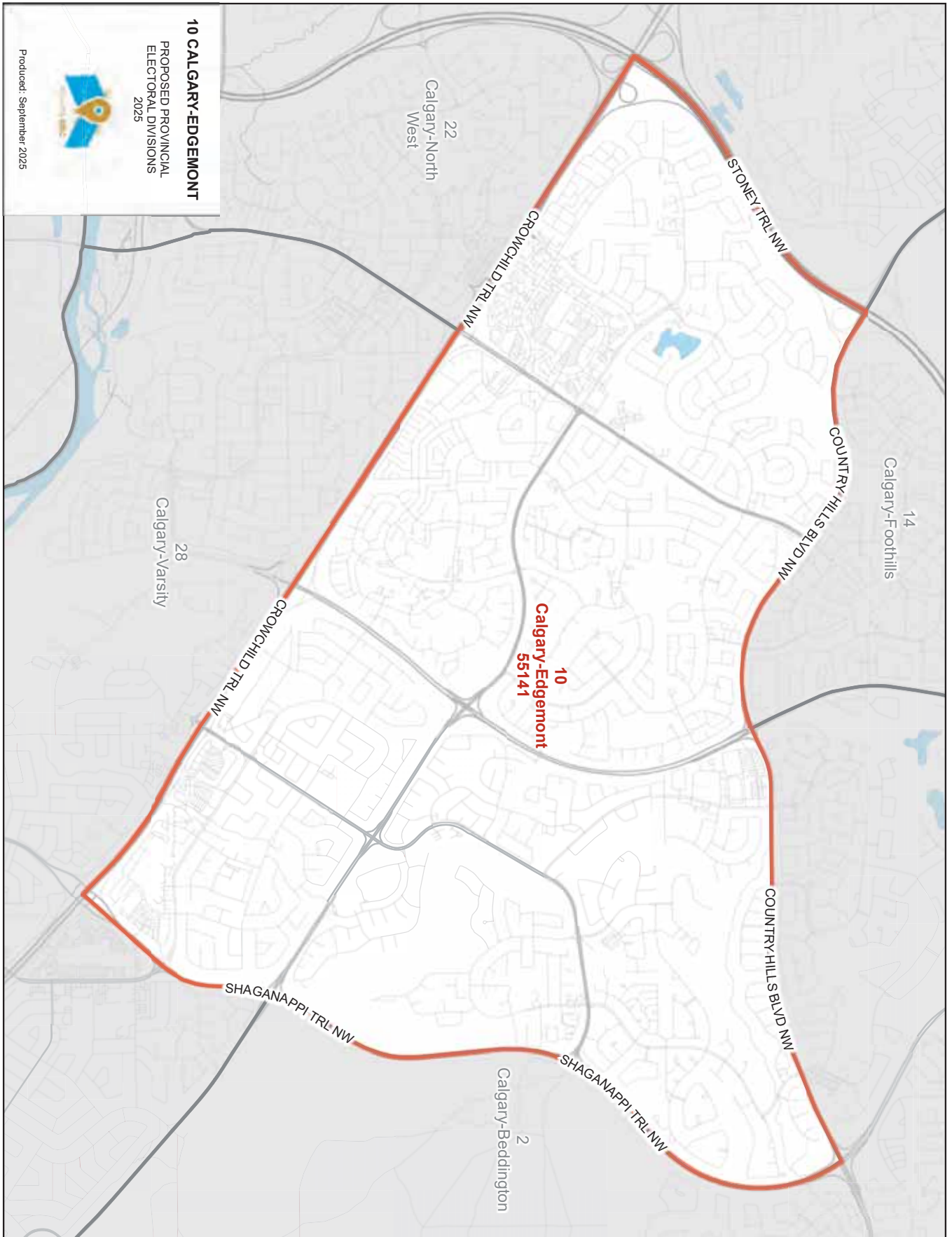


8 CALGARY-CURRIE
 PROPOSED PROVINCIAL
 ELECTORAL DIVISIONS
 2025



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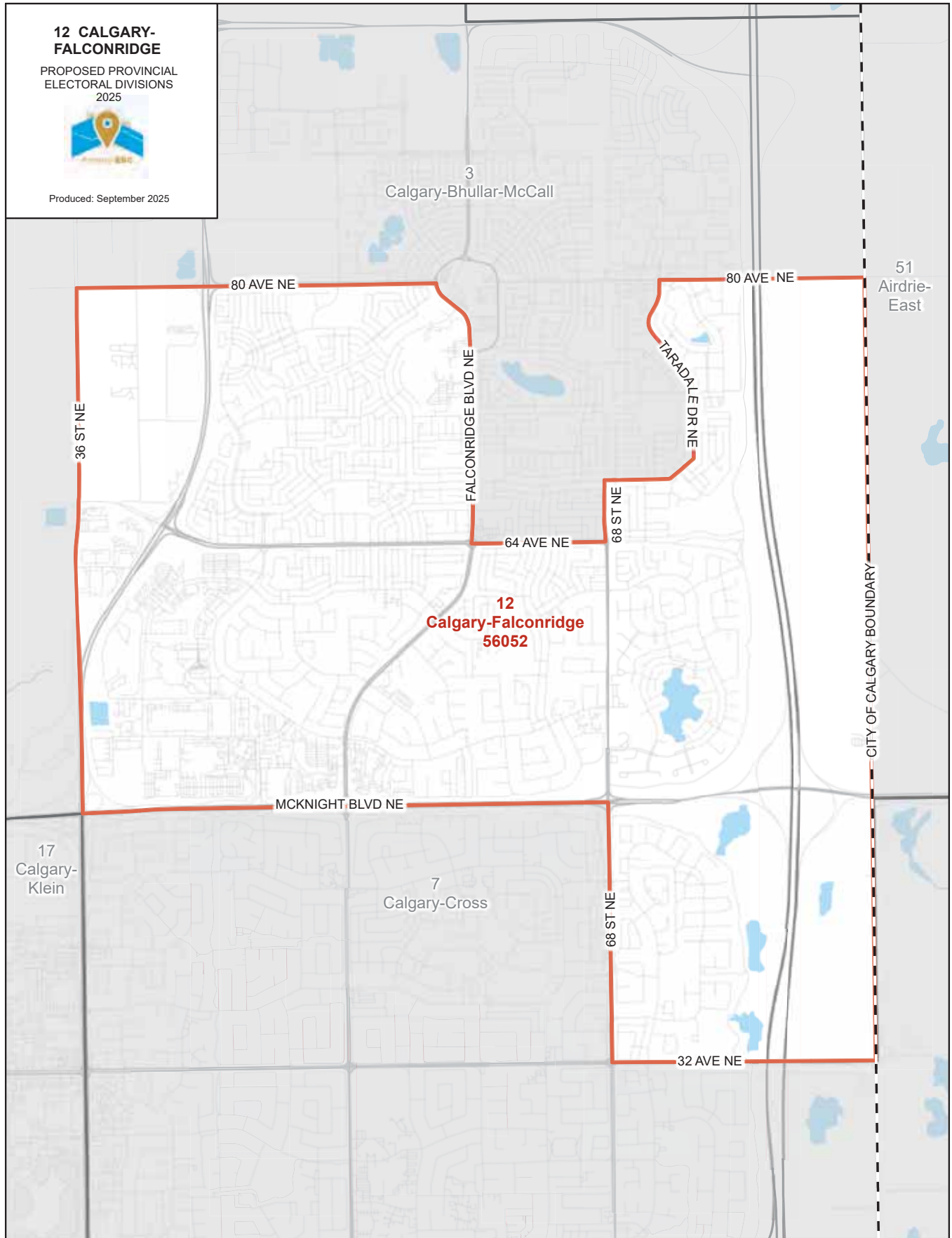


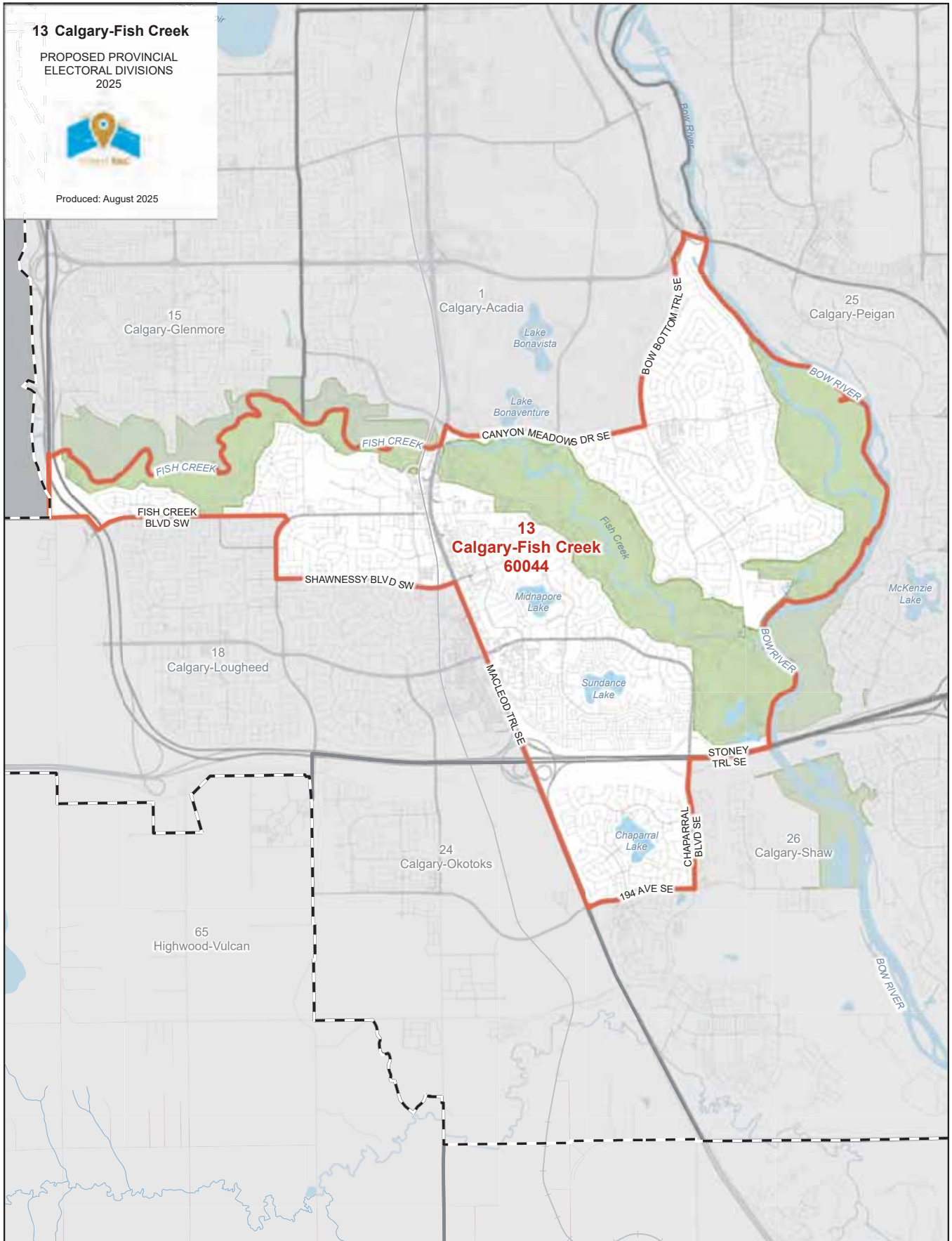
12 CALGARY-FALCONRIDGE

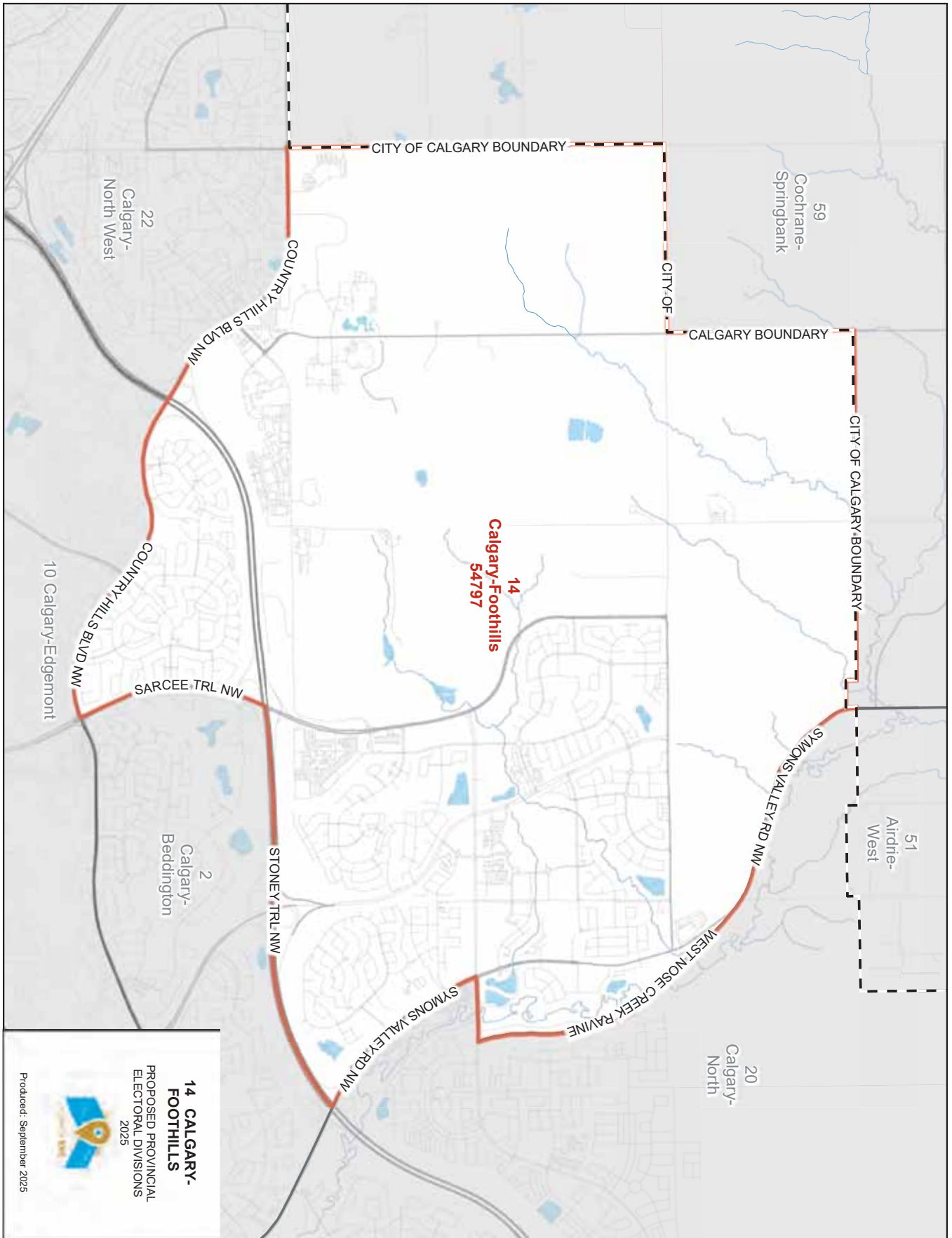
PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025

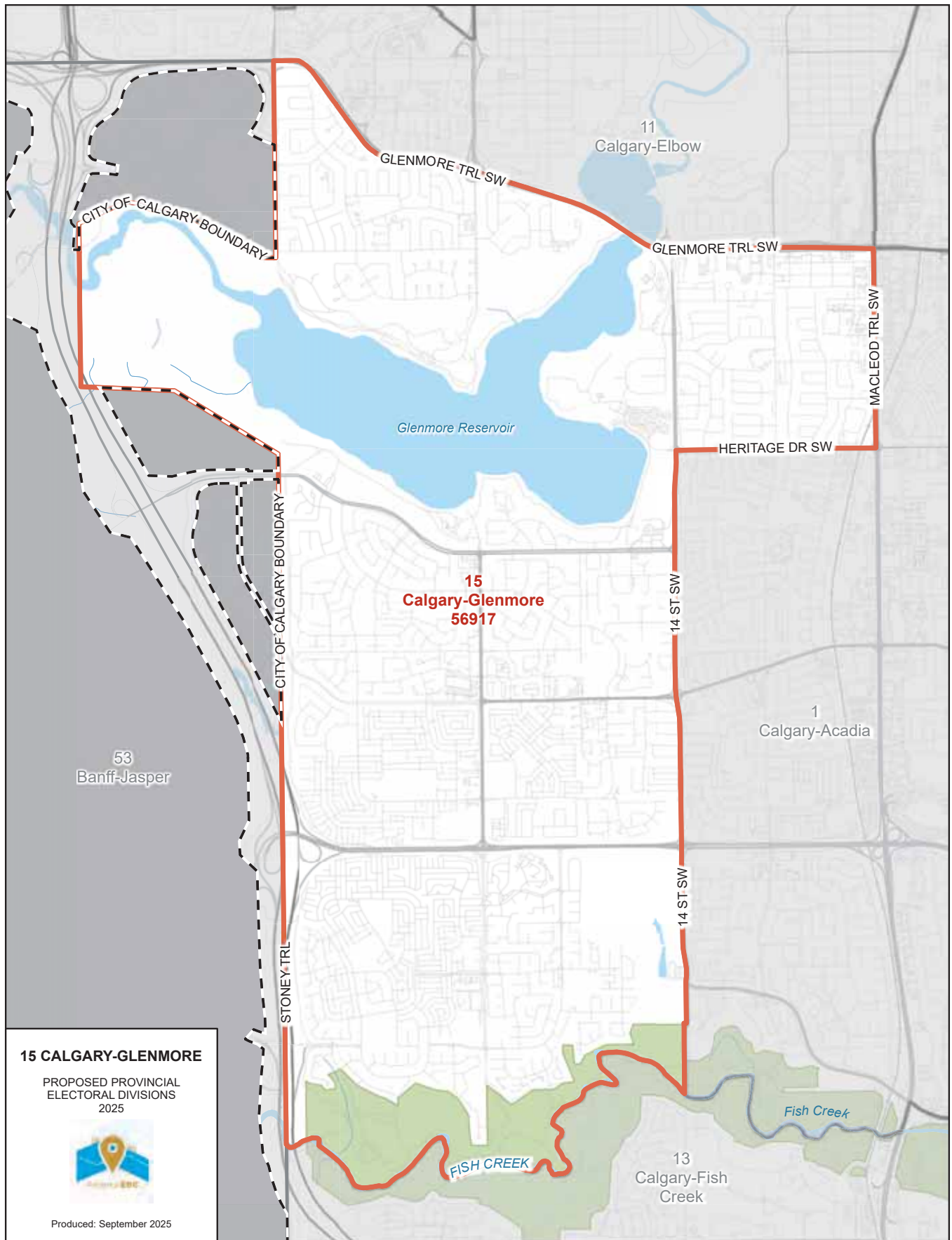


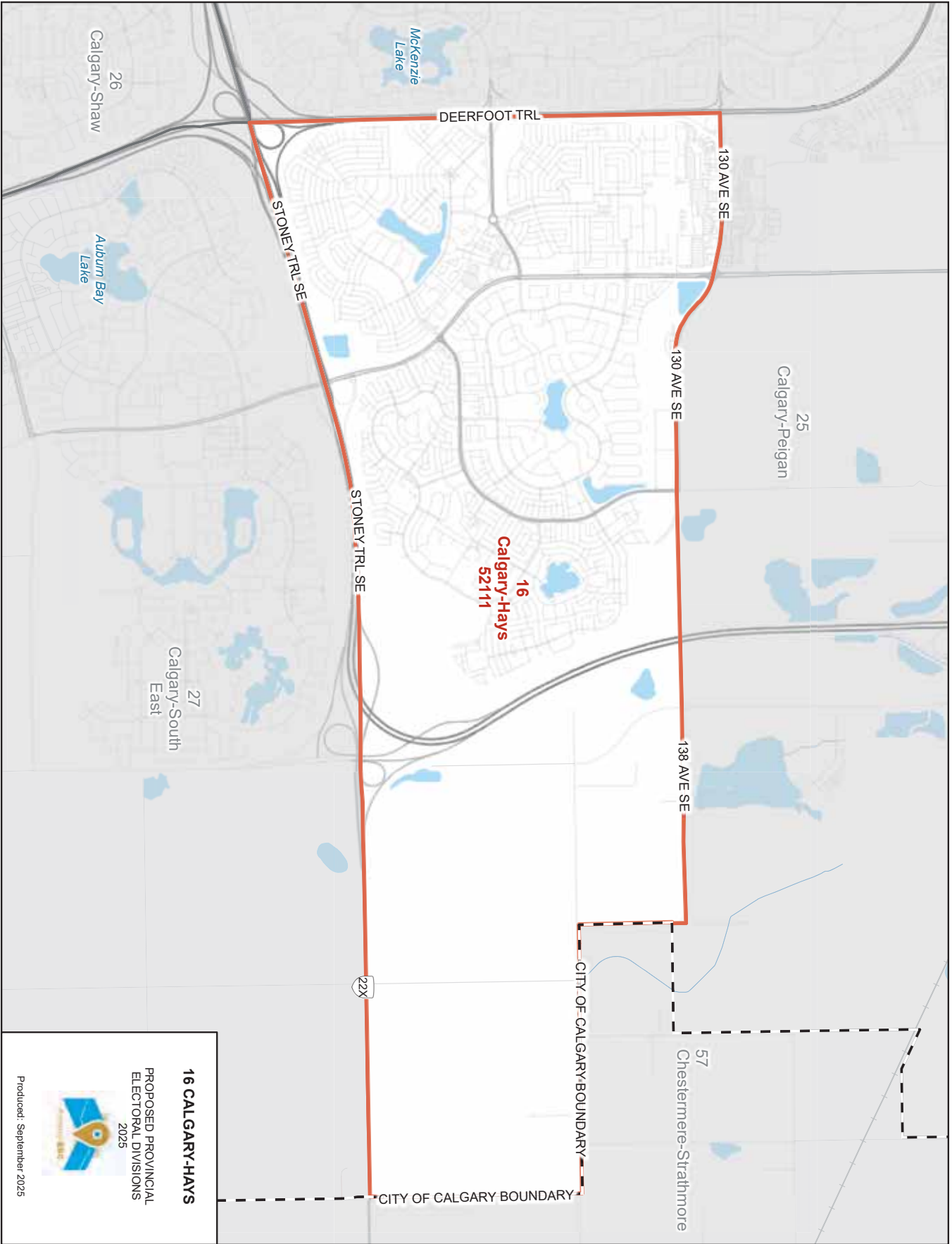
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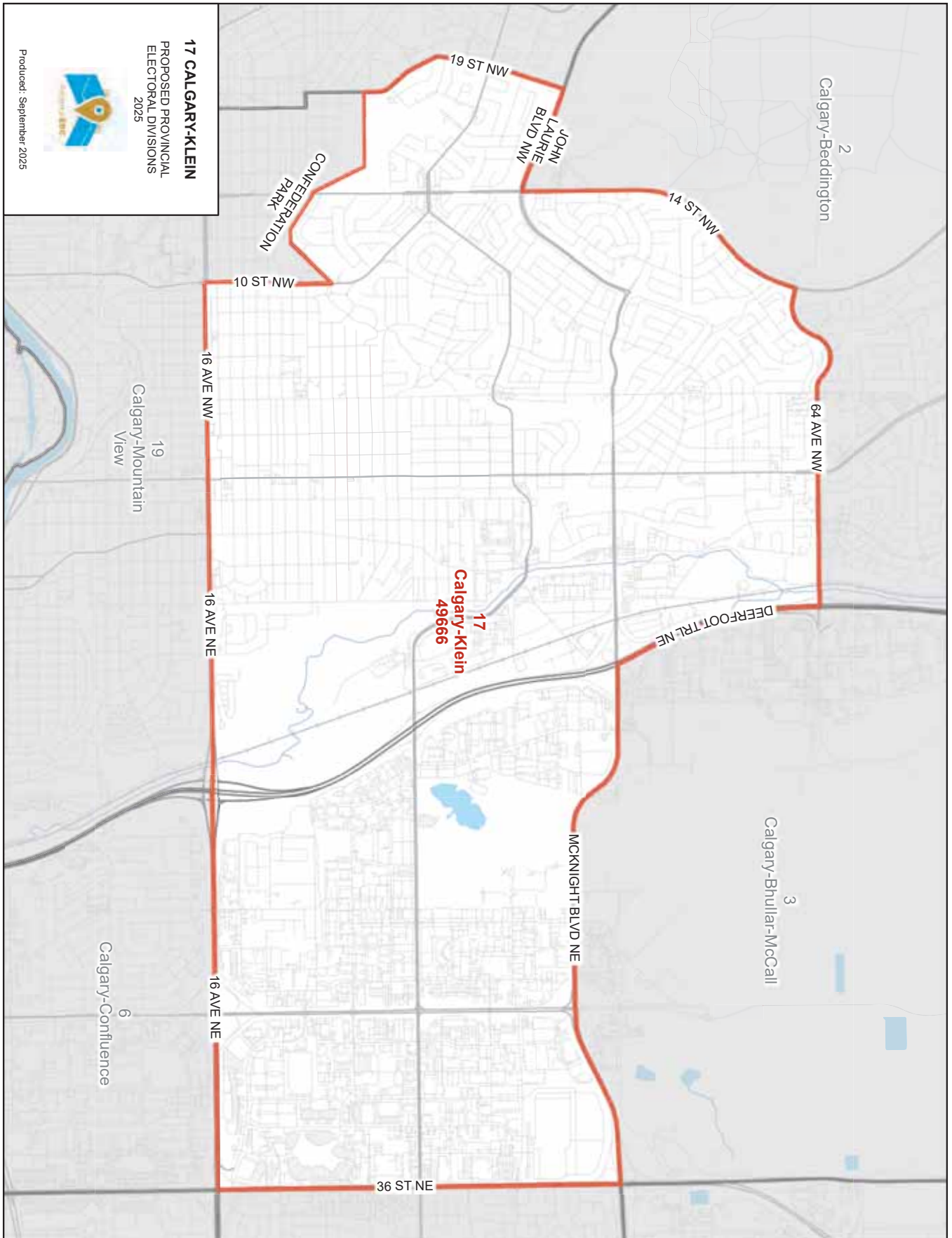


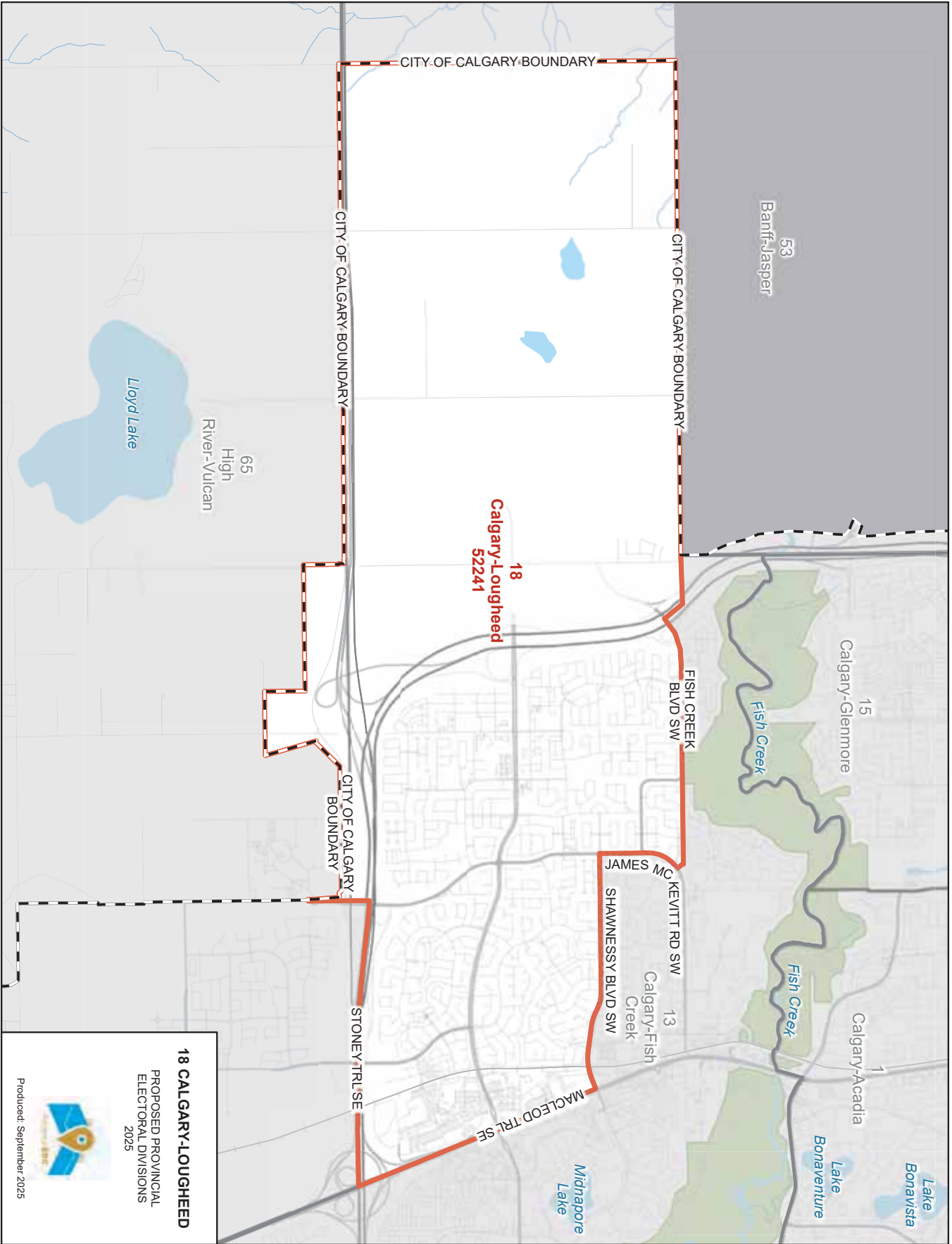


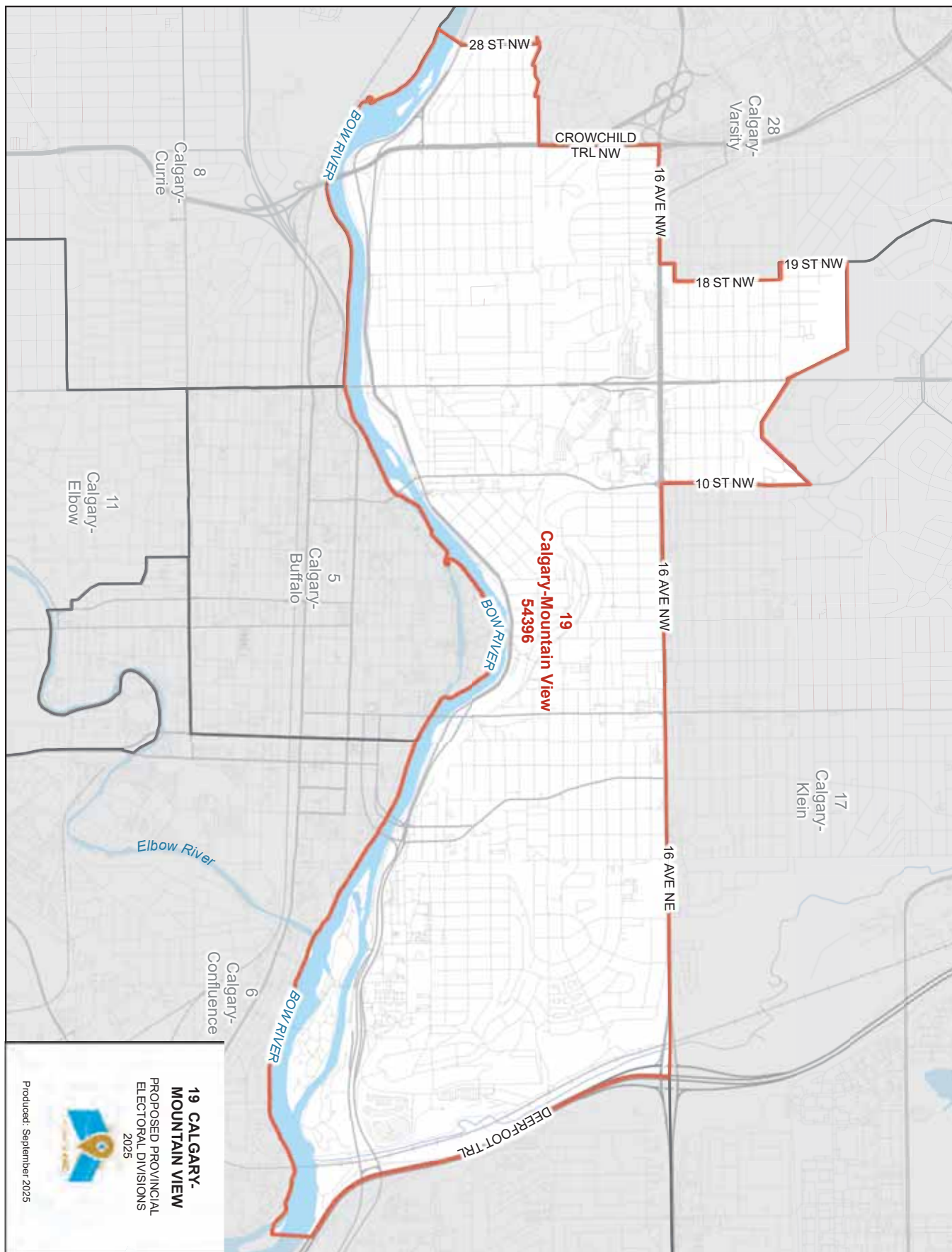










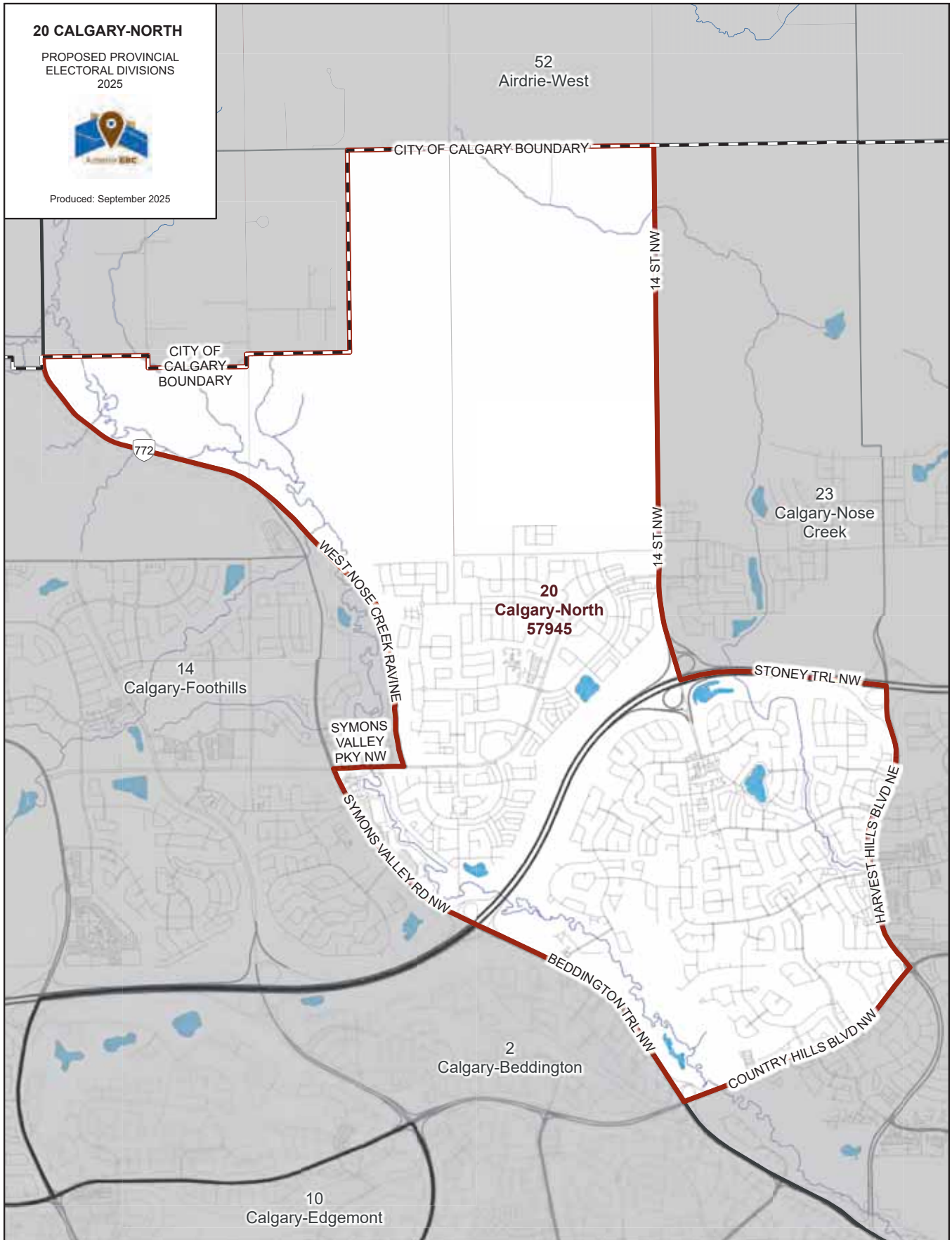


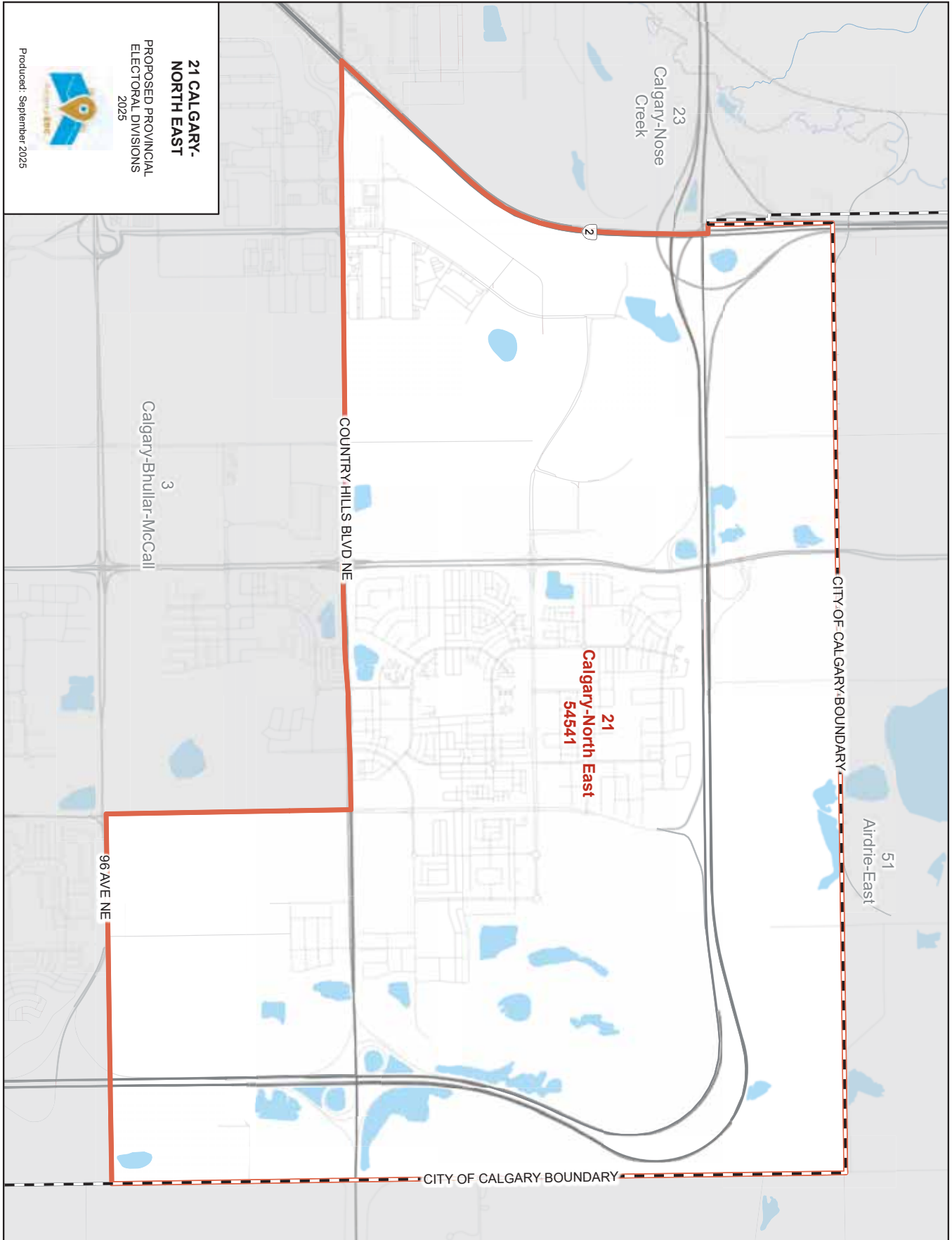
20 CALGARY-NORTH

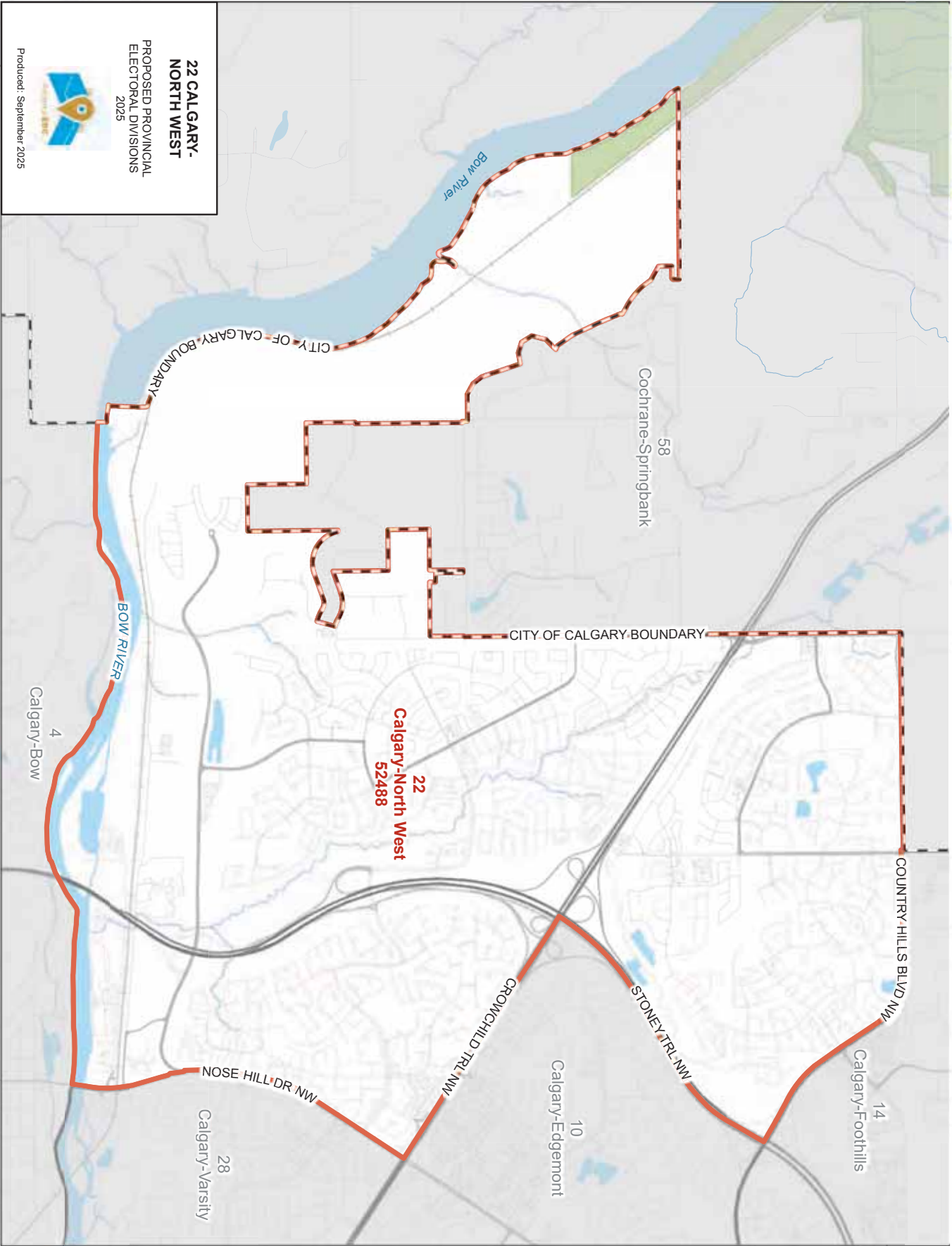
PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025

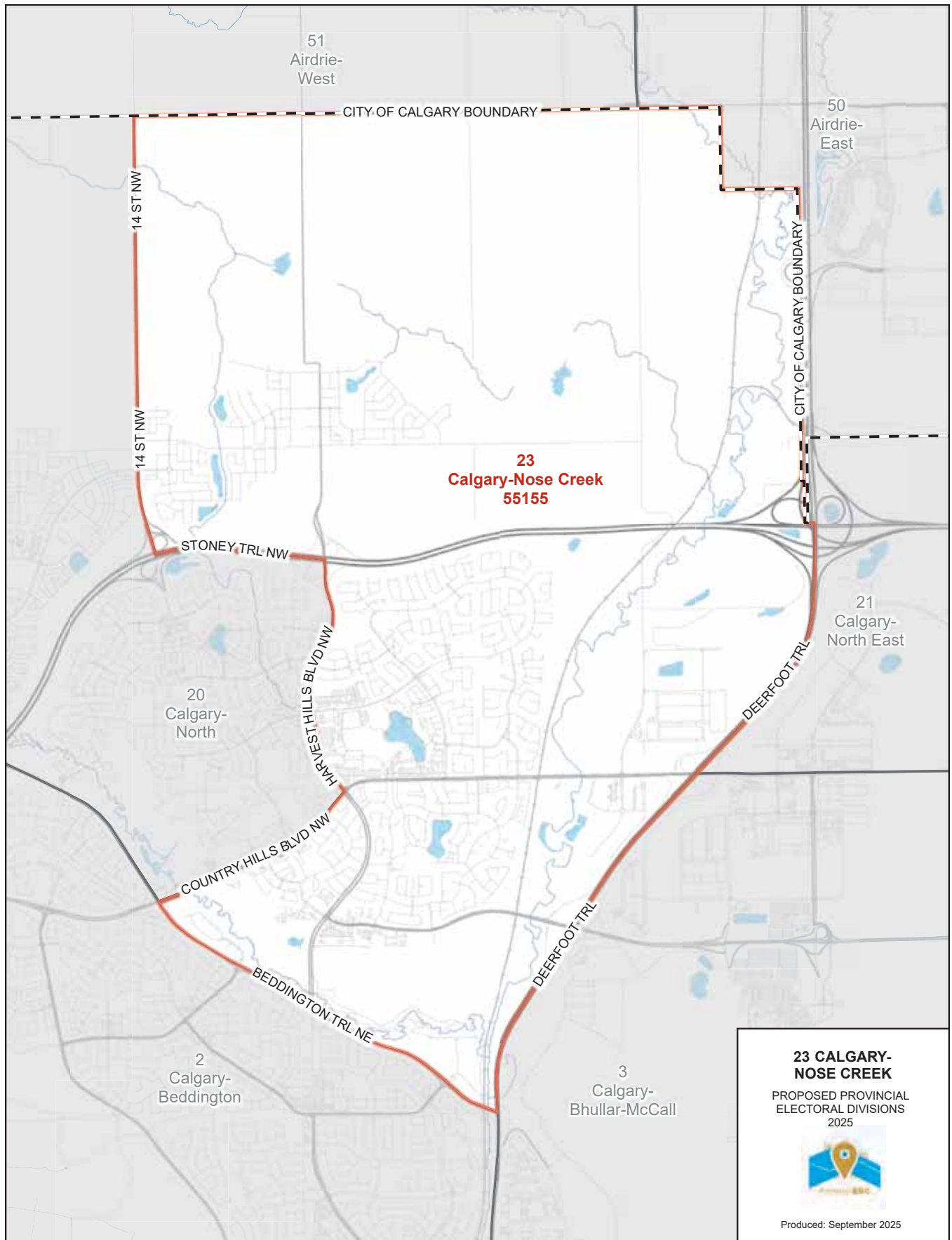


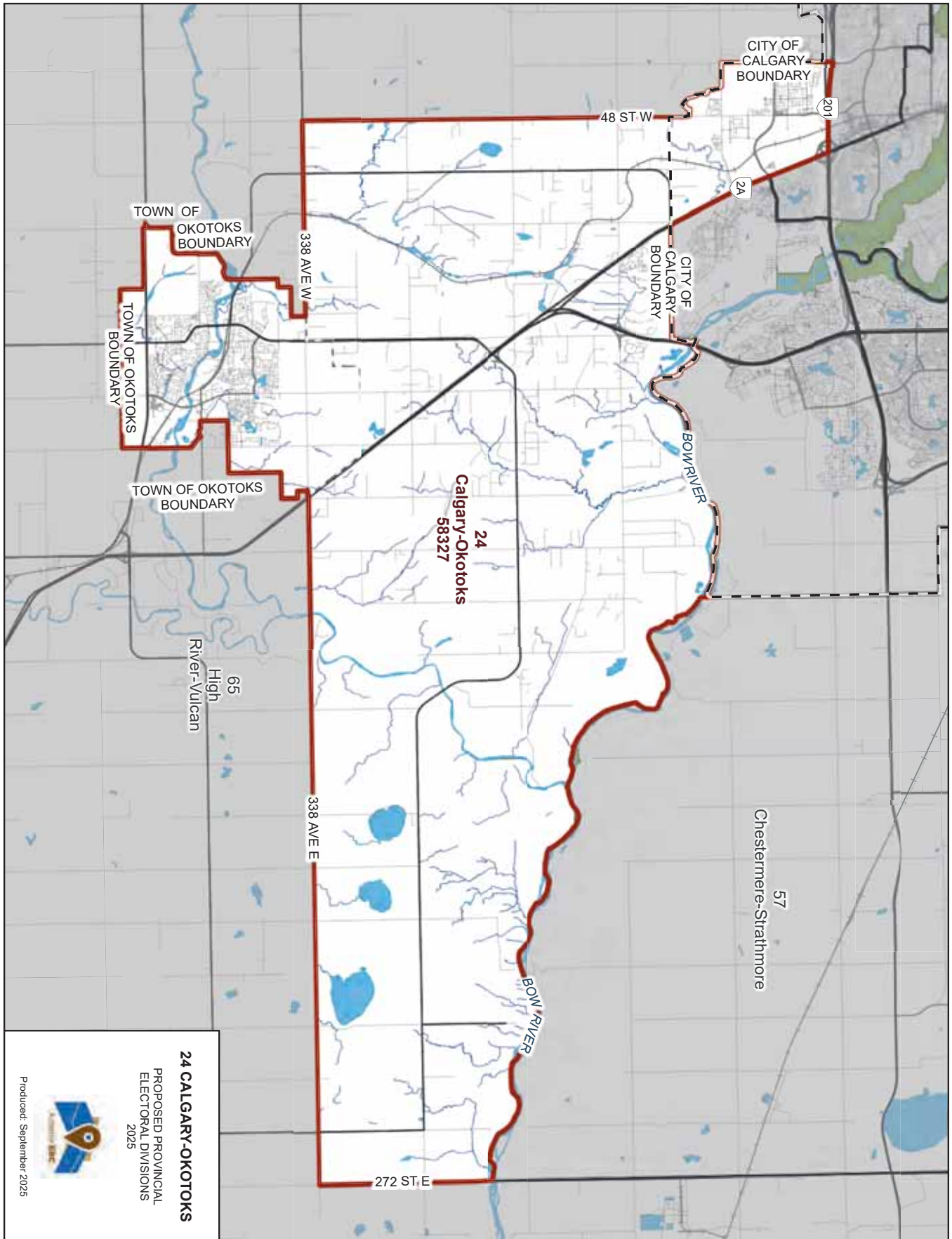
Produced: September 2025

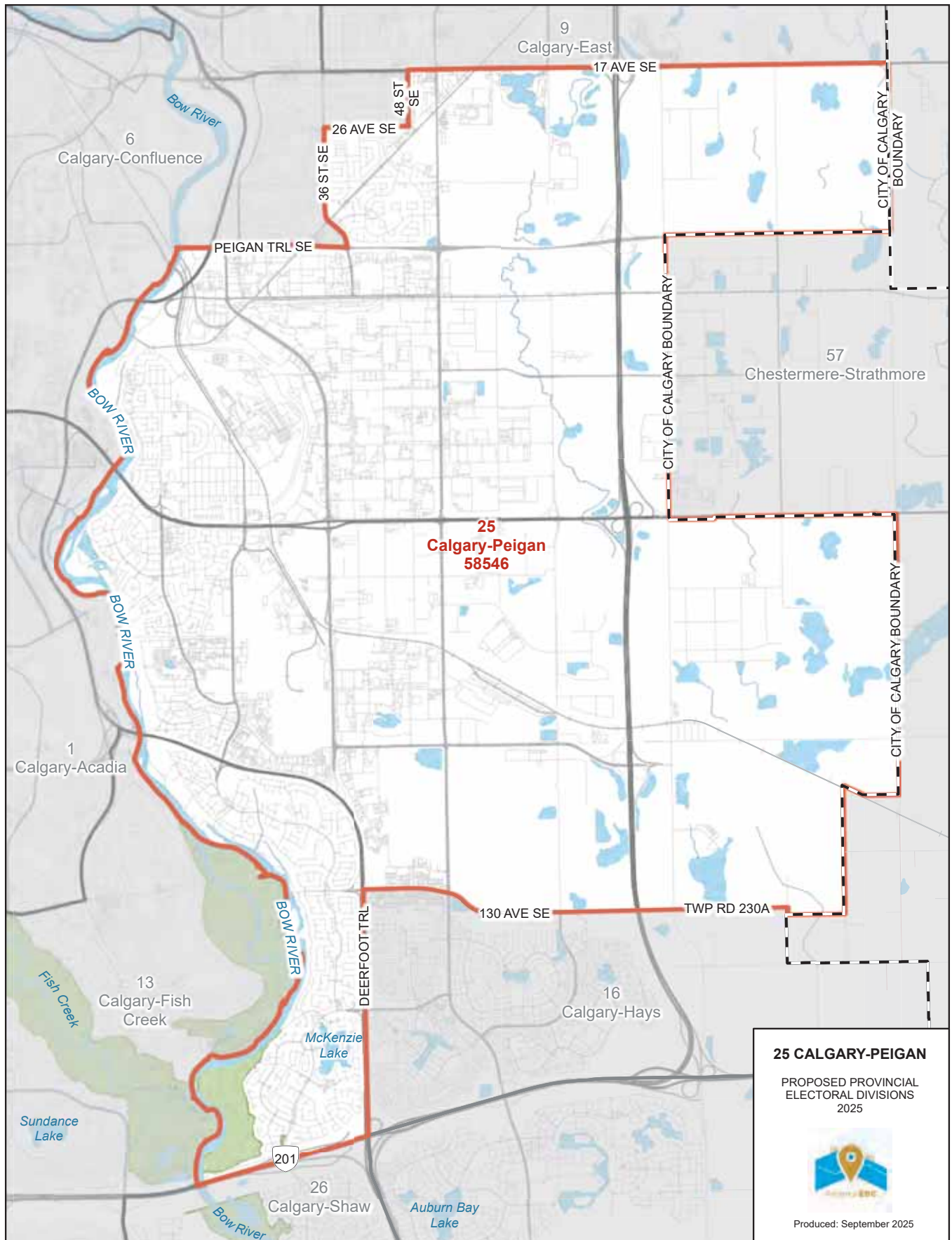


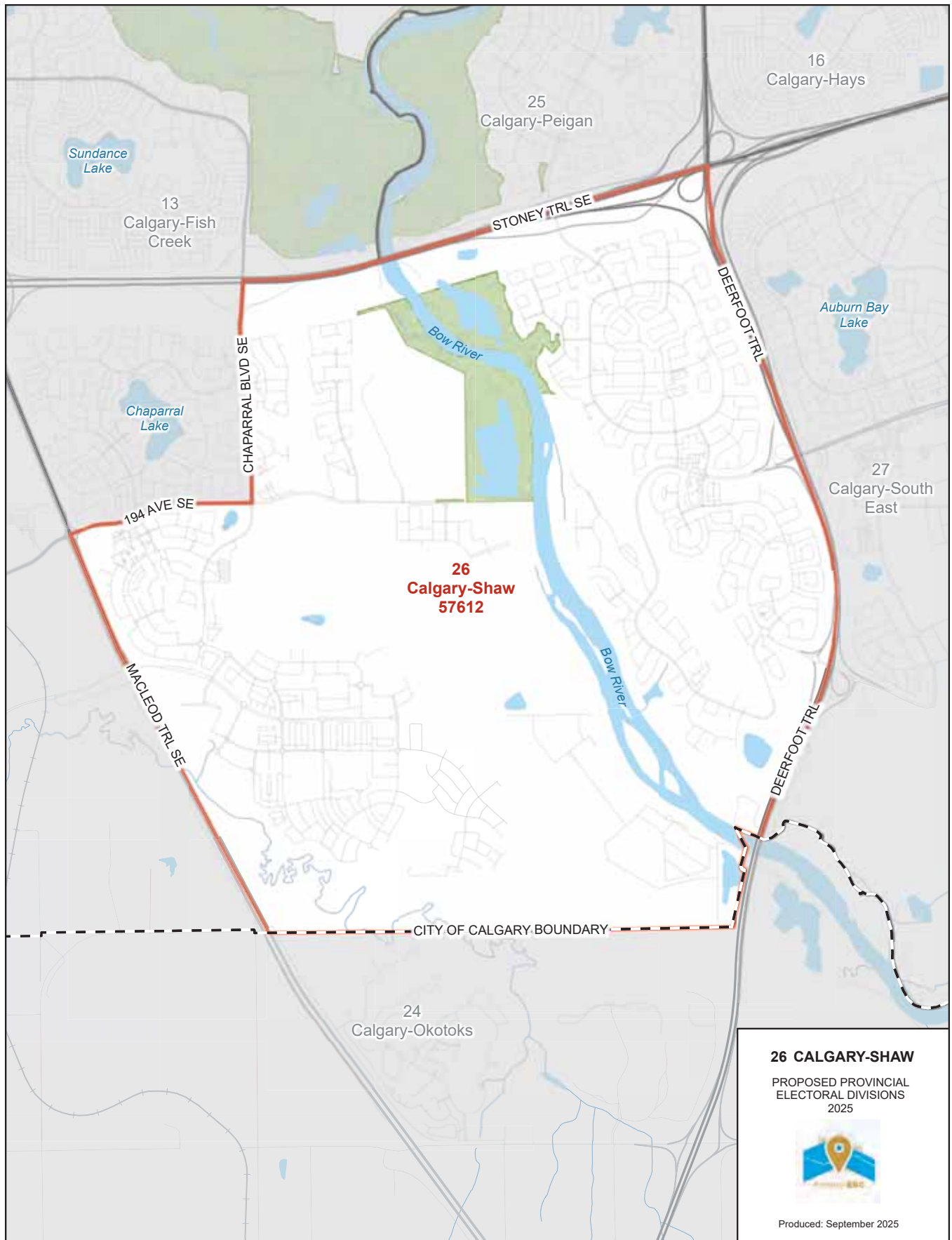


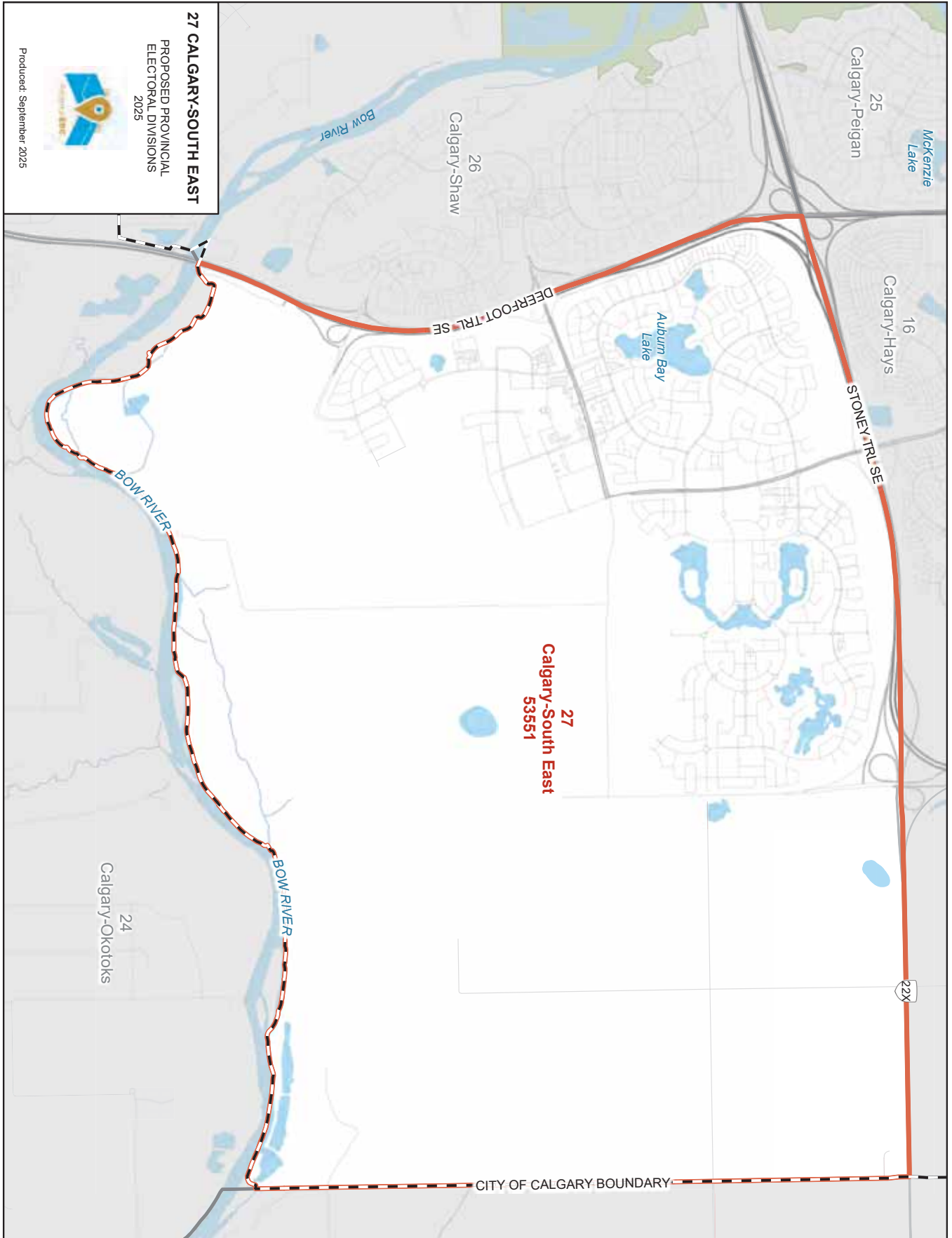


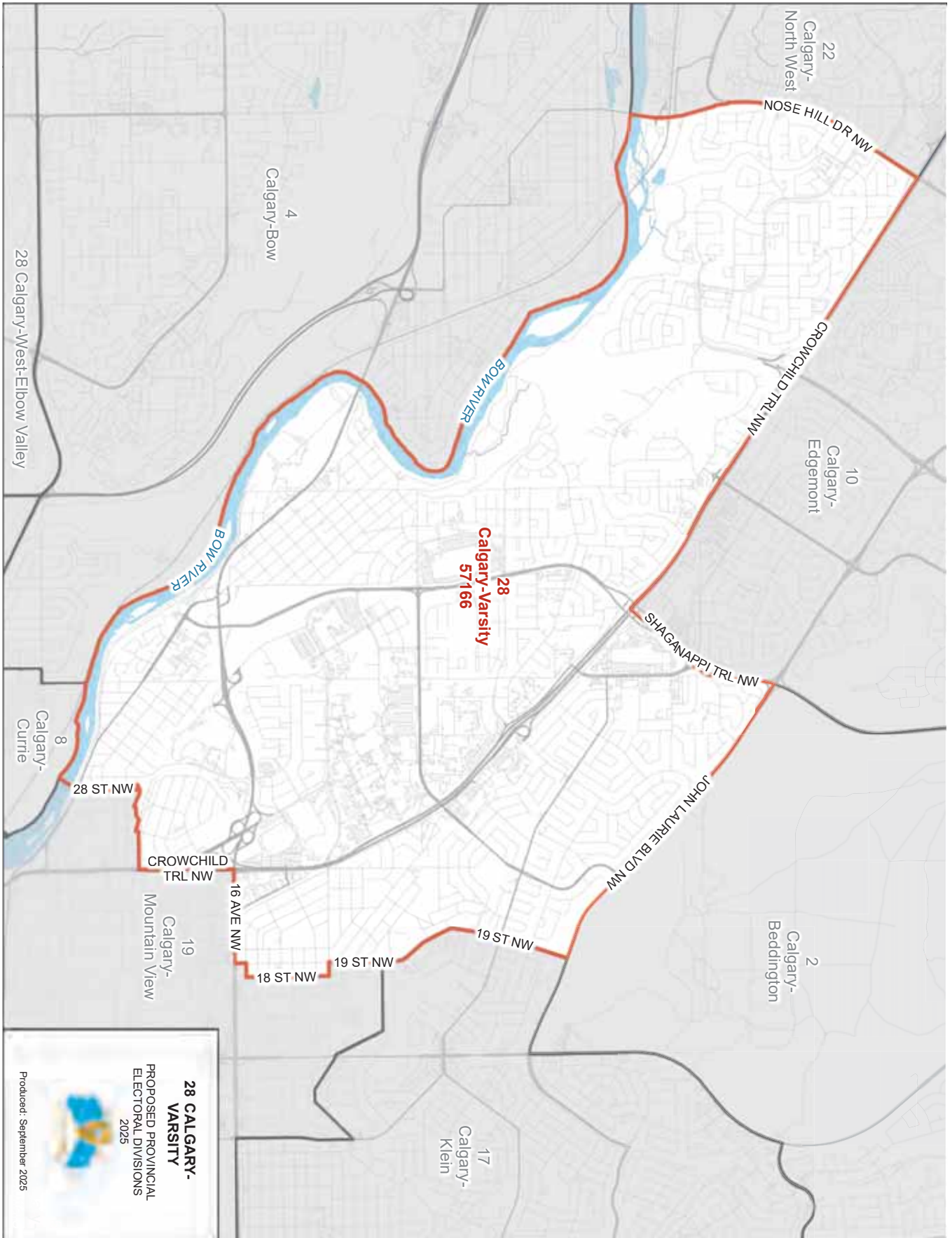


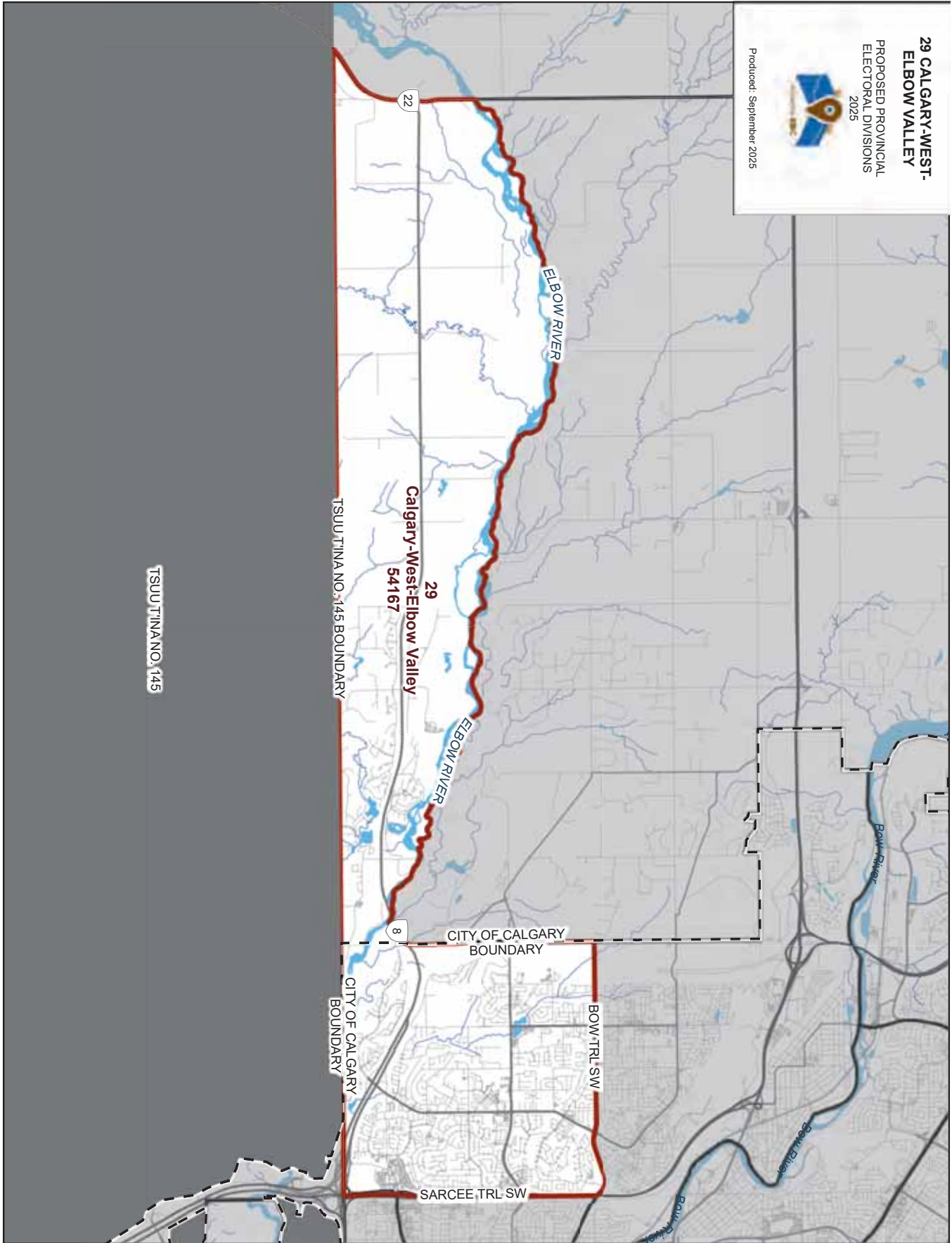


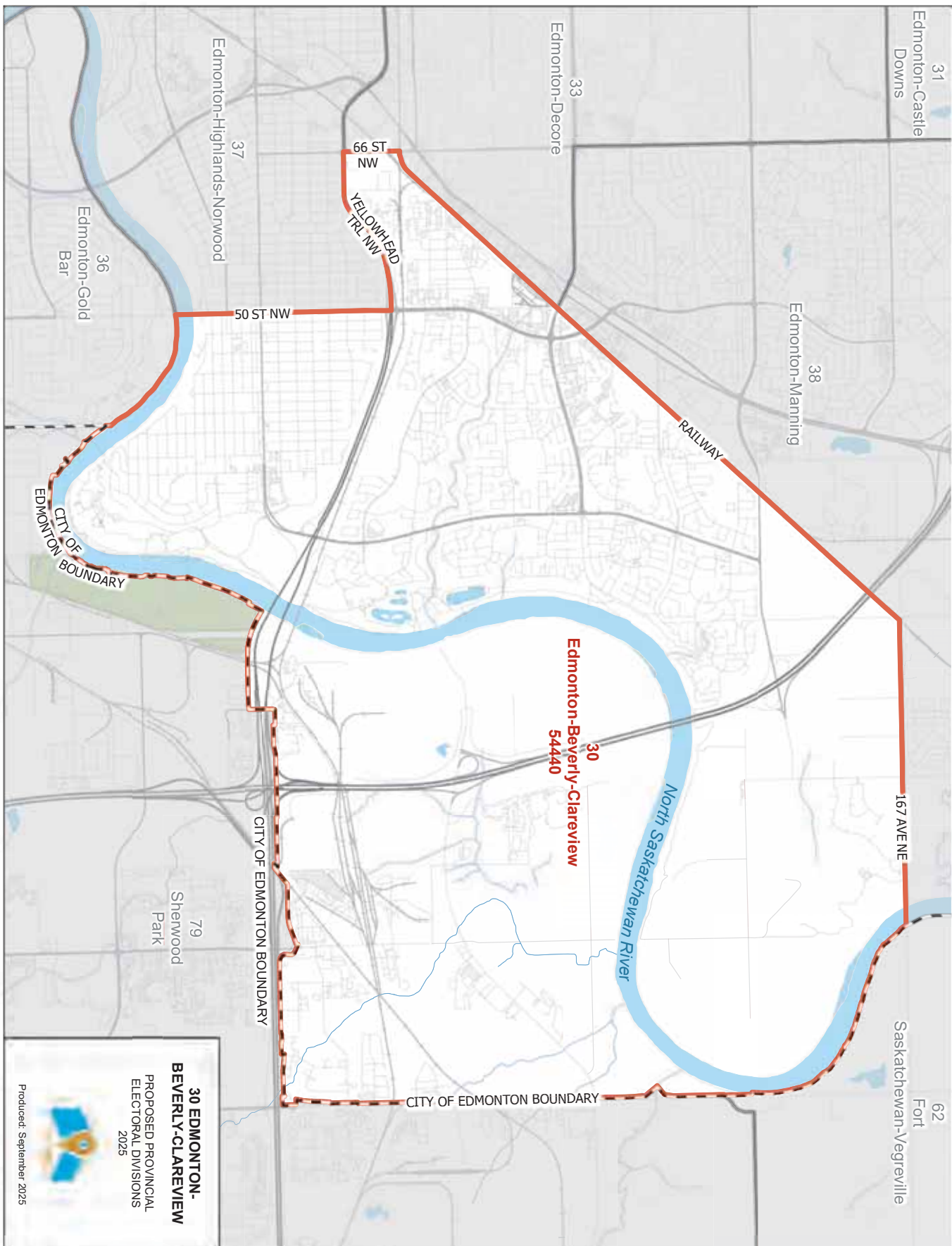


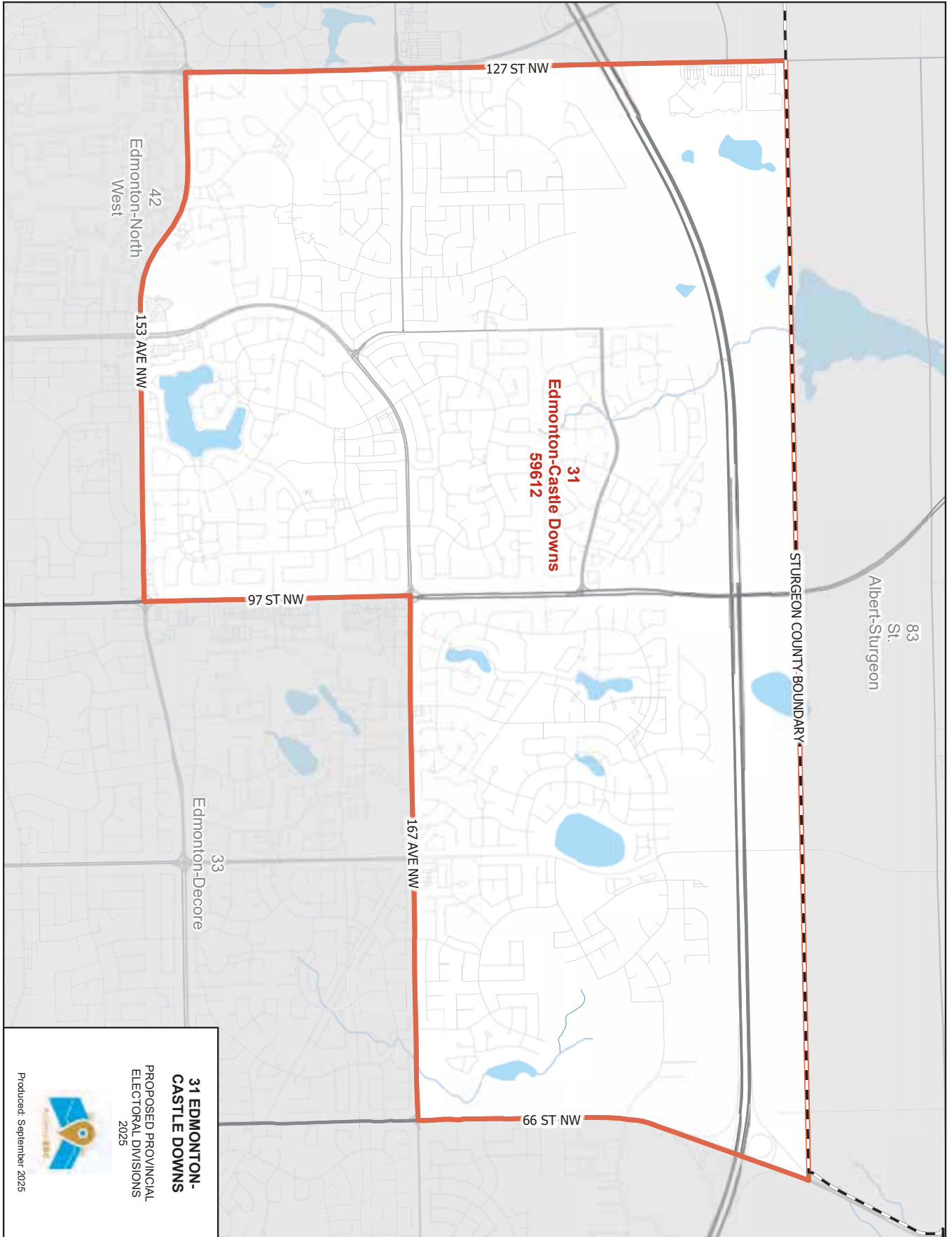










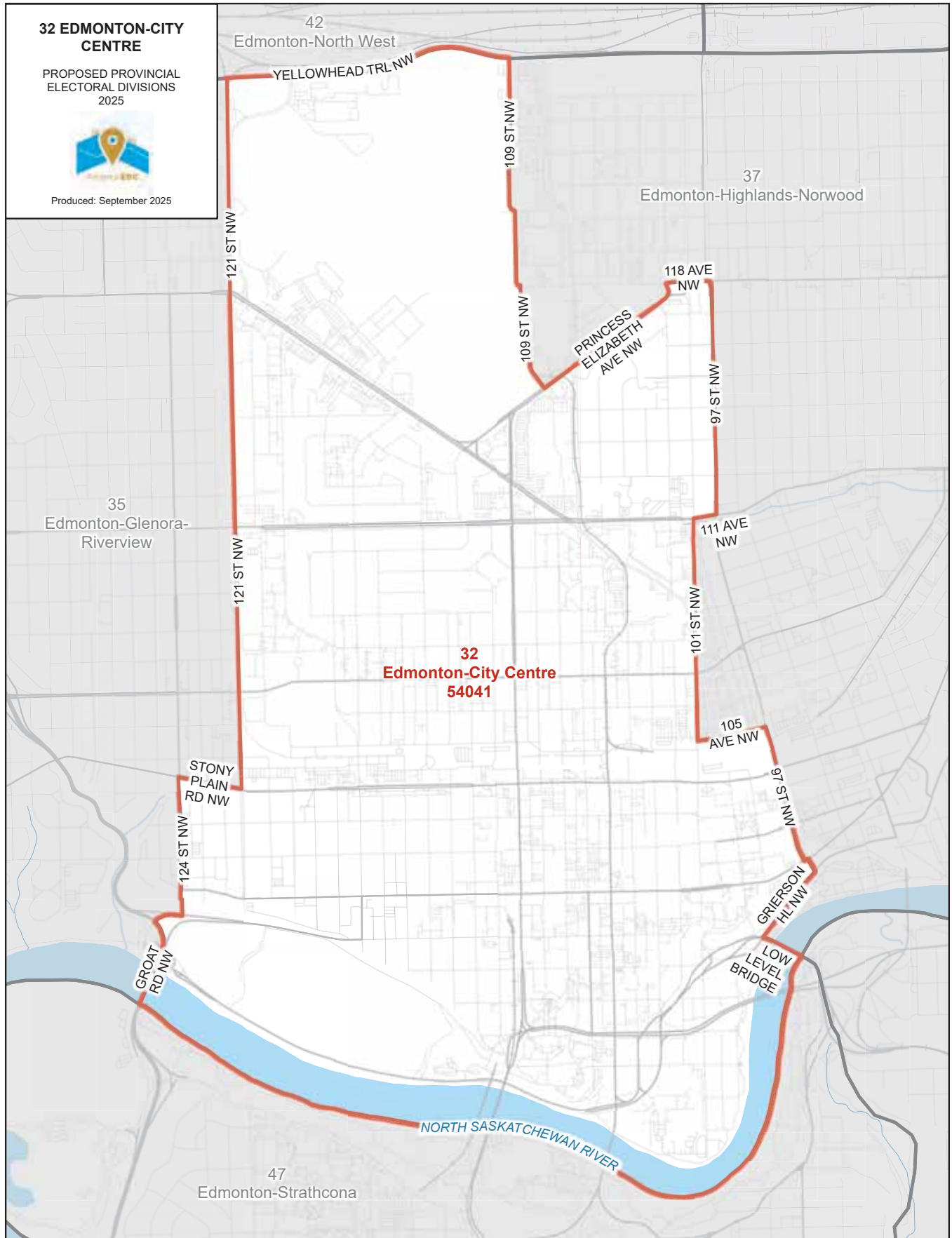


32 EDMONTON-CITY CENTRE

PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025



Produced: September 2025

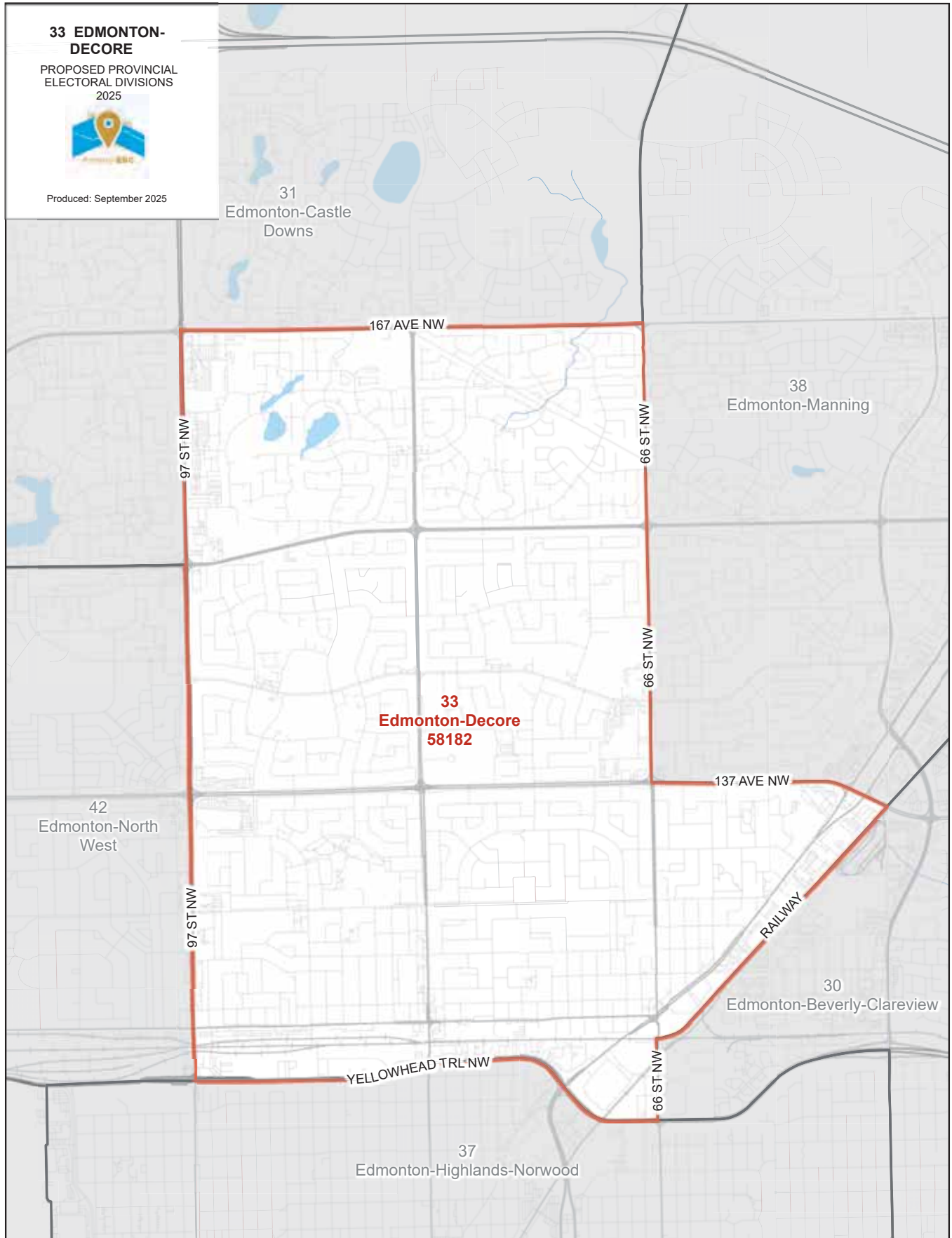


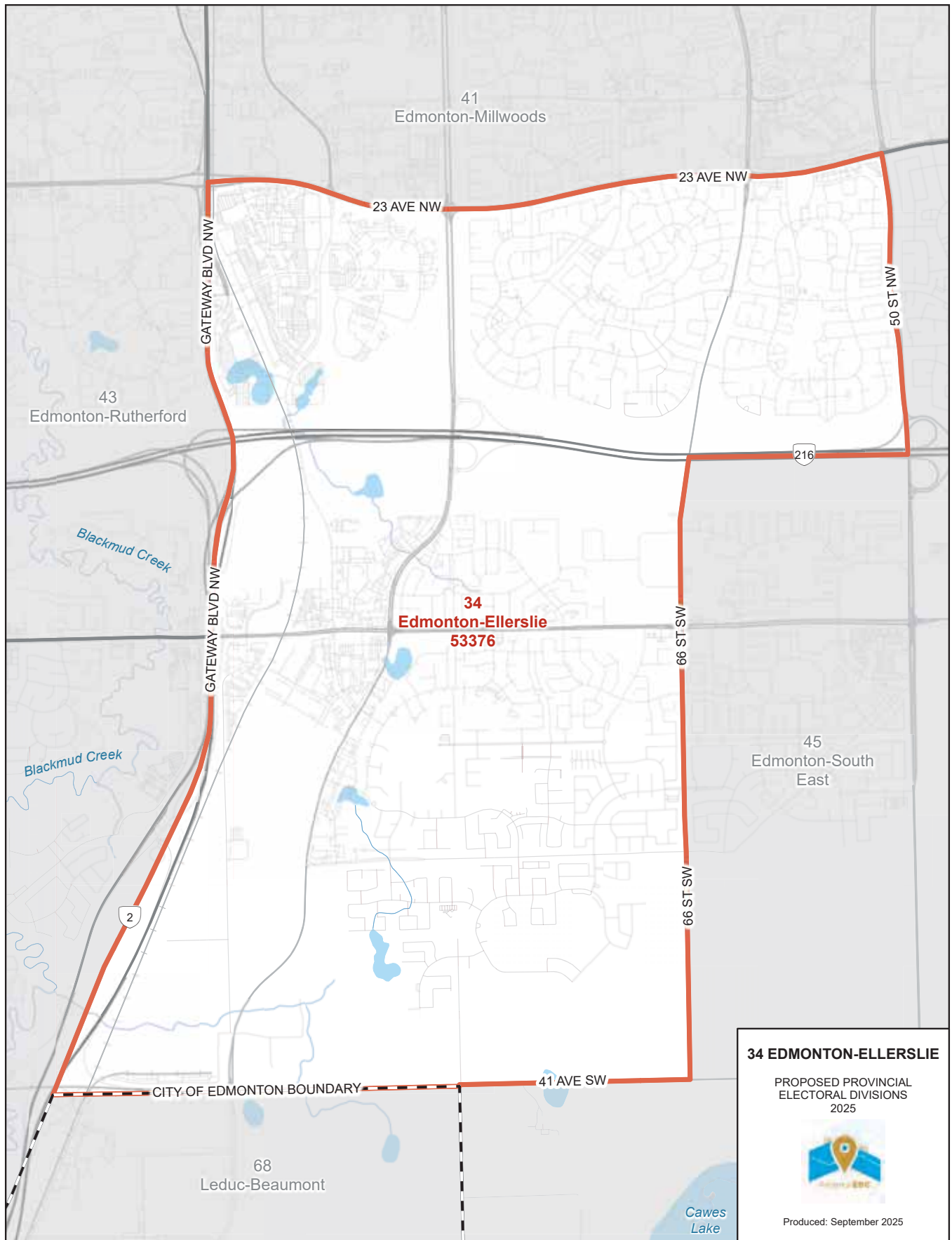
**33 EDMONTON-
DECORE**

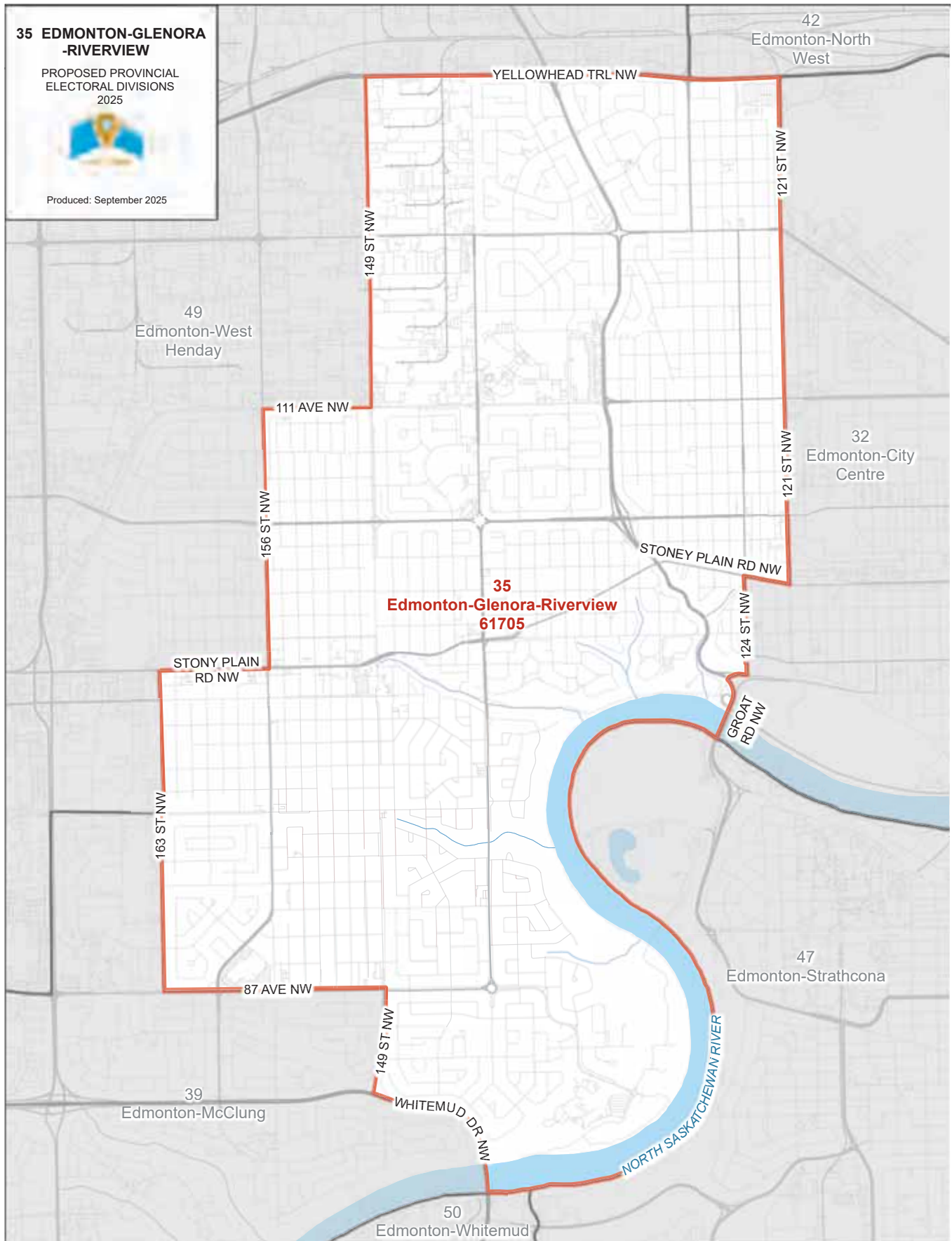
PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025

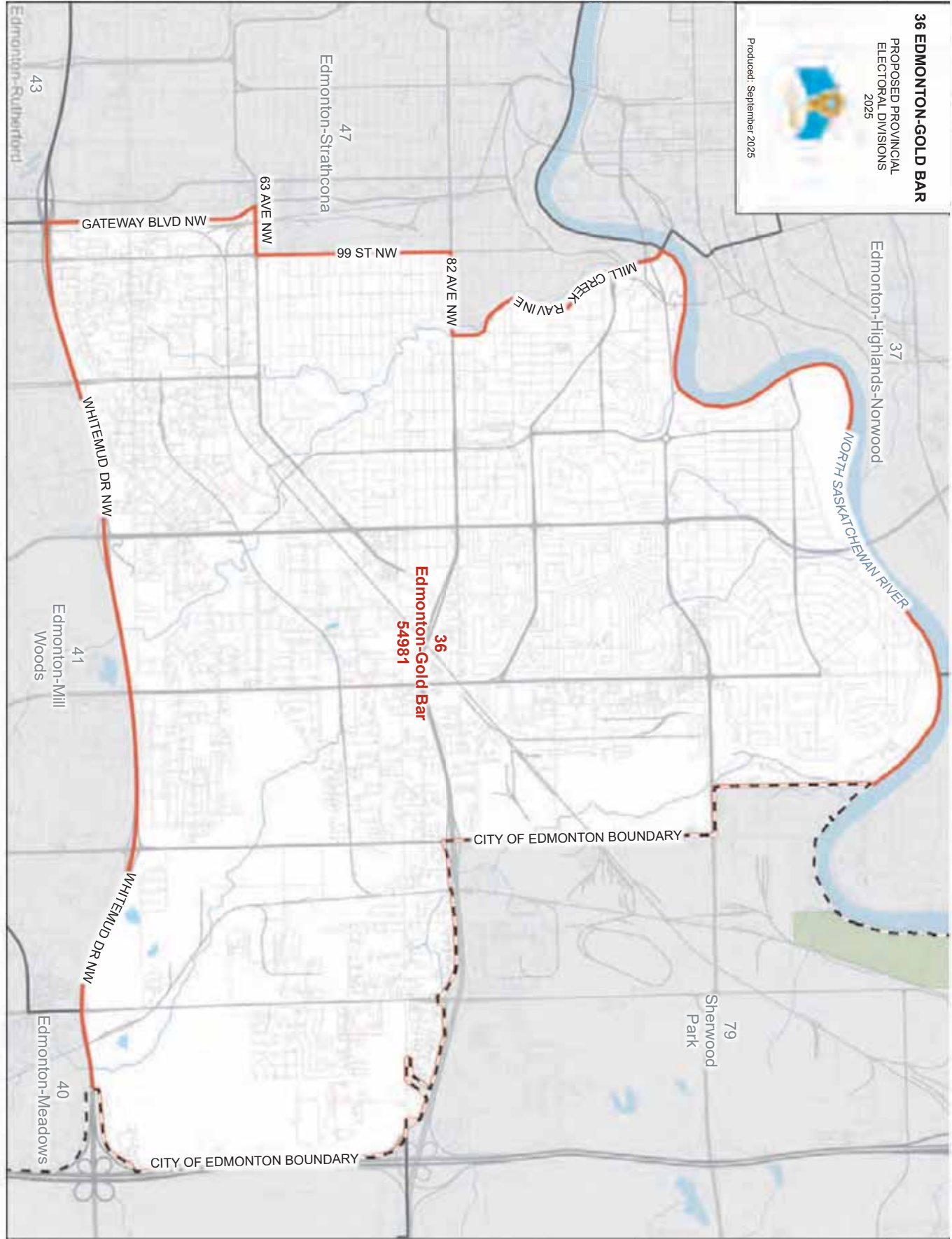


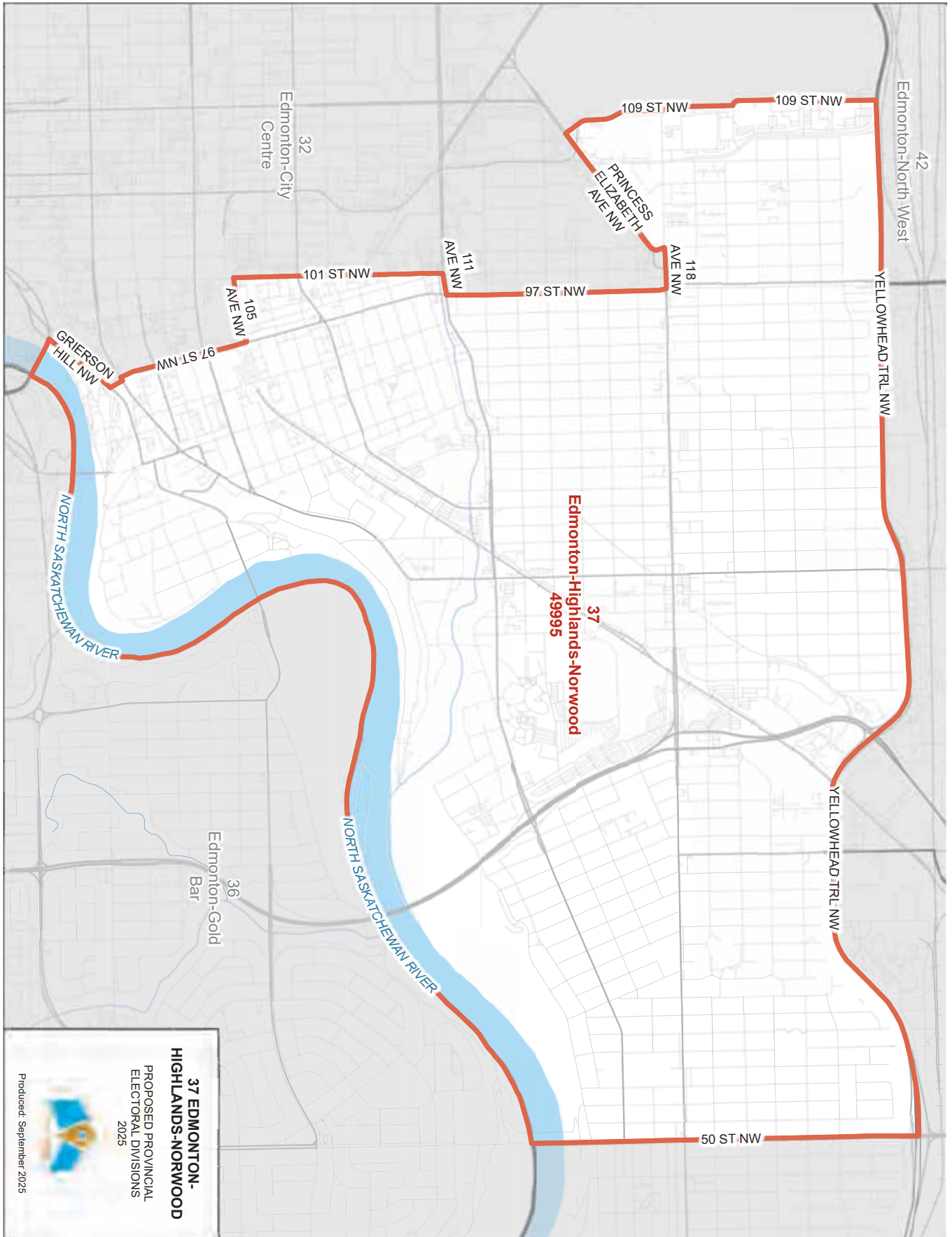
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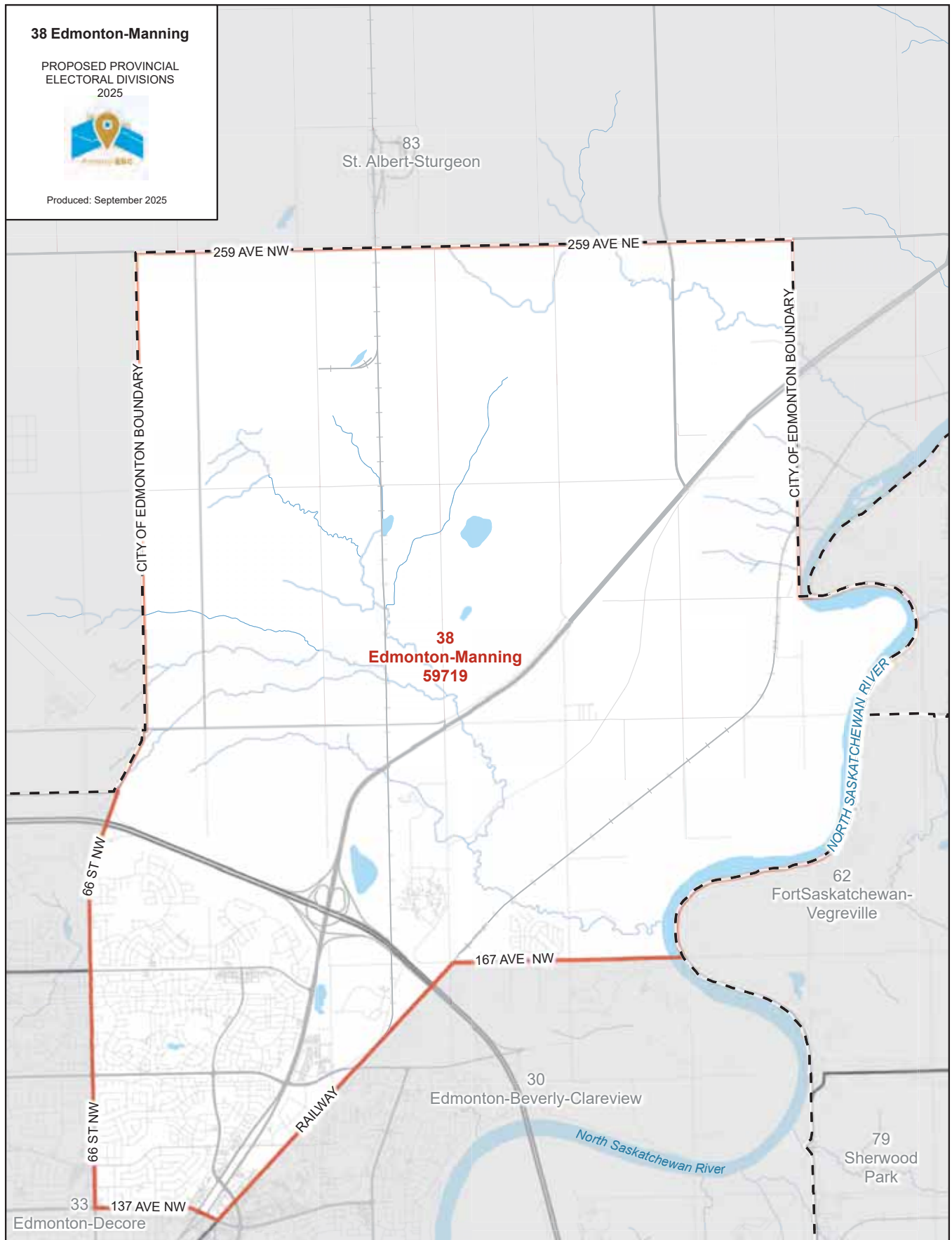


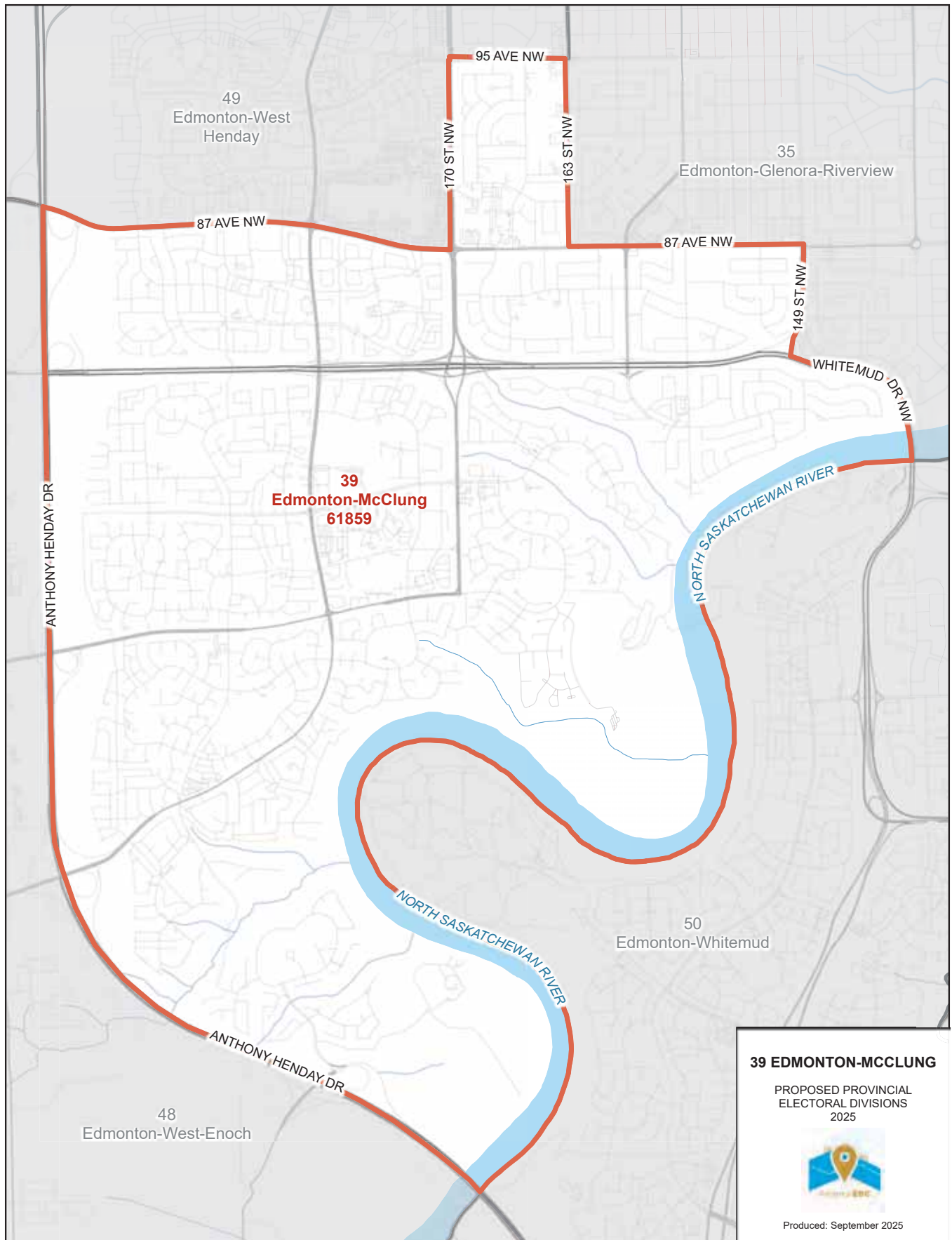
38 Edmonton-Manning

PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025



Produced: September 2025



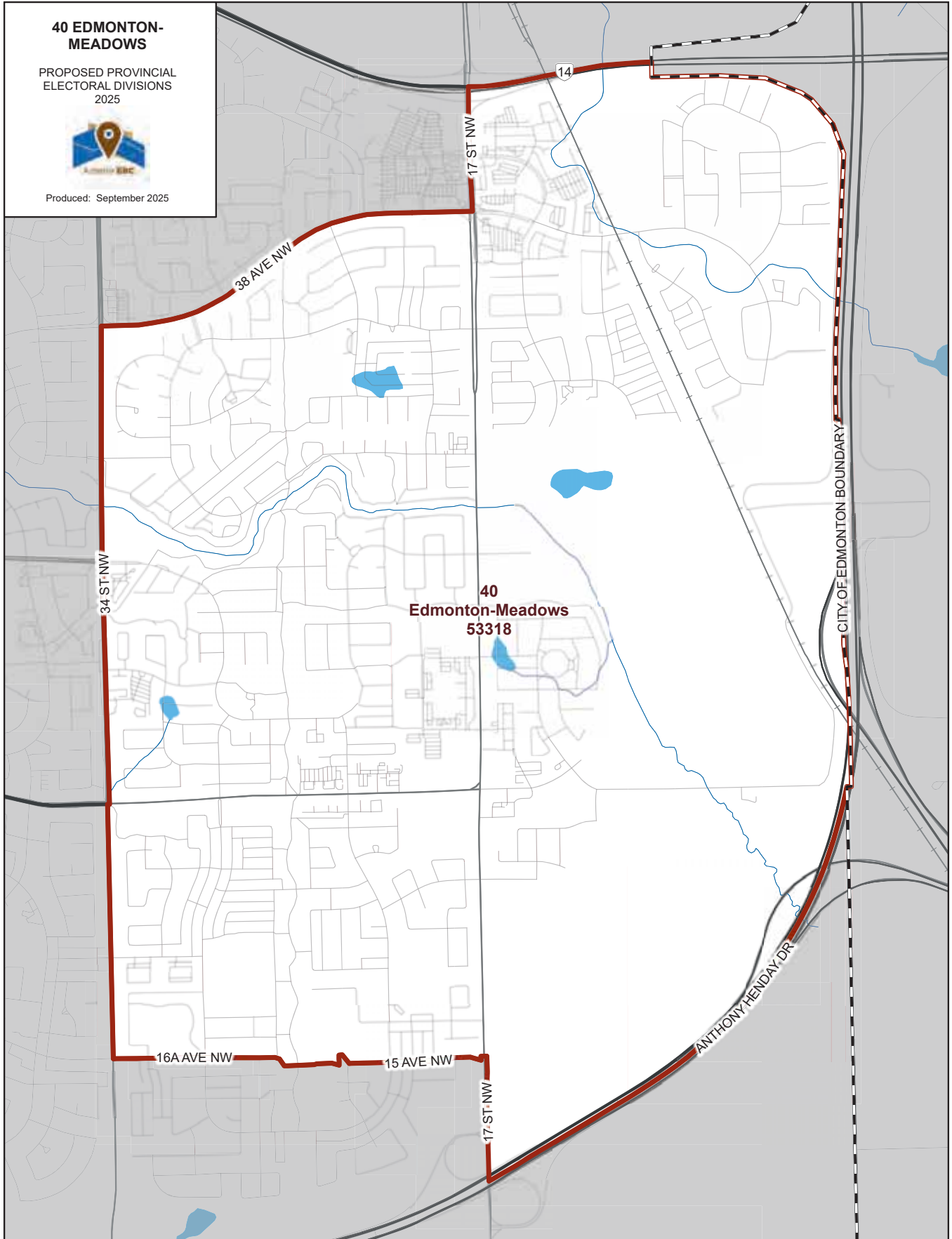


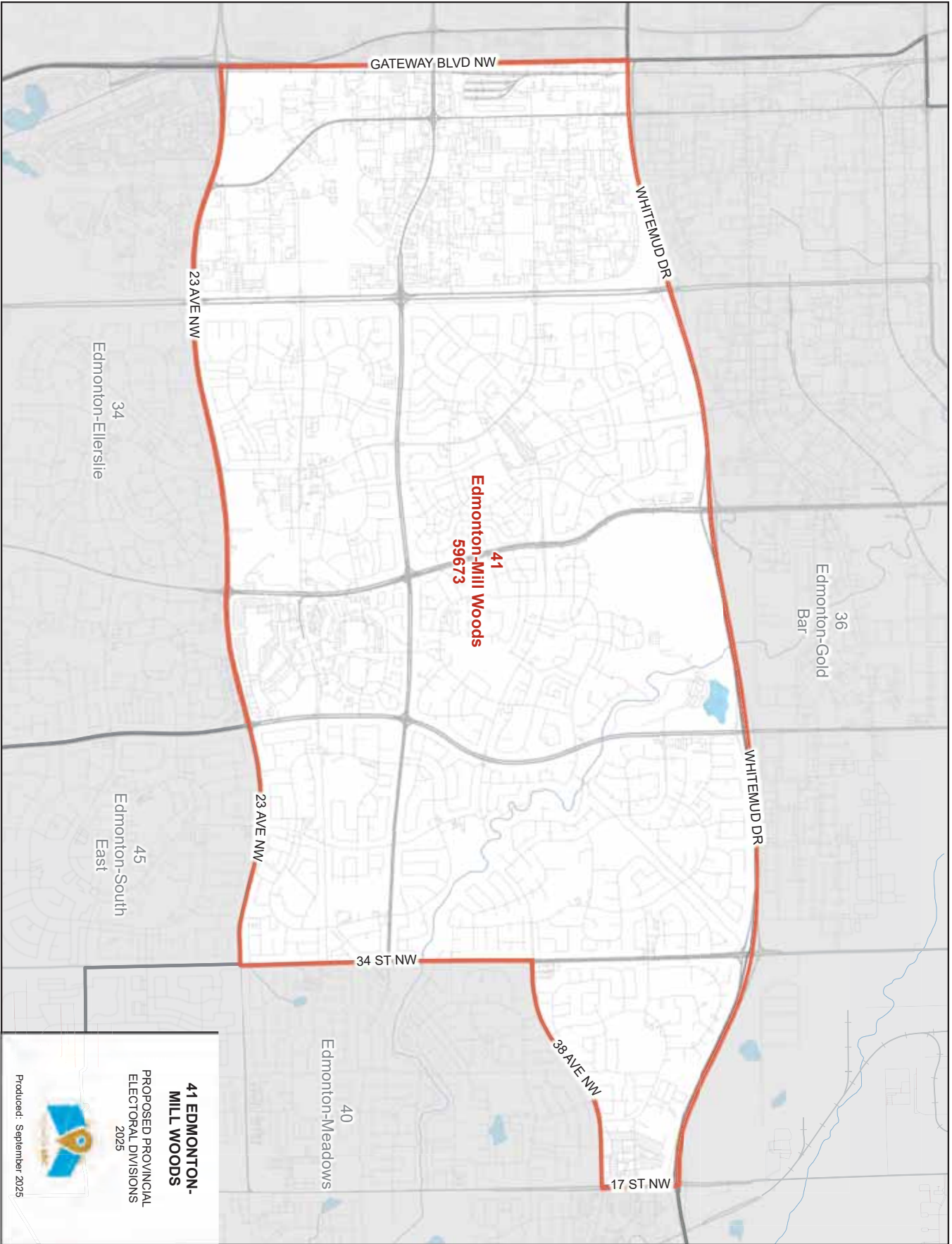
**40 EDMONTON-
MEADOWS**

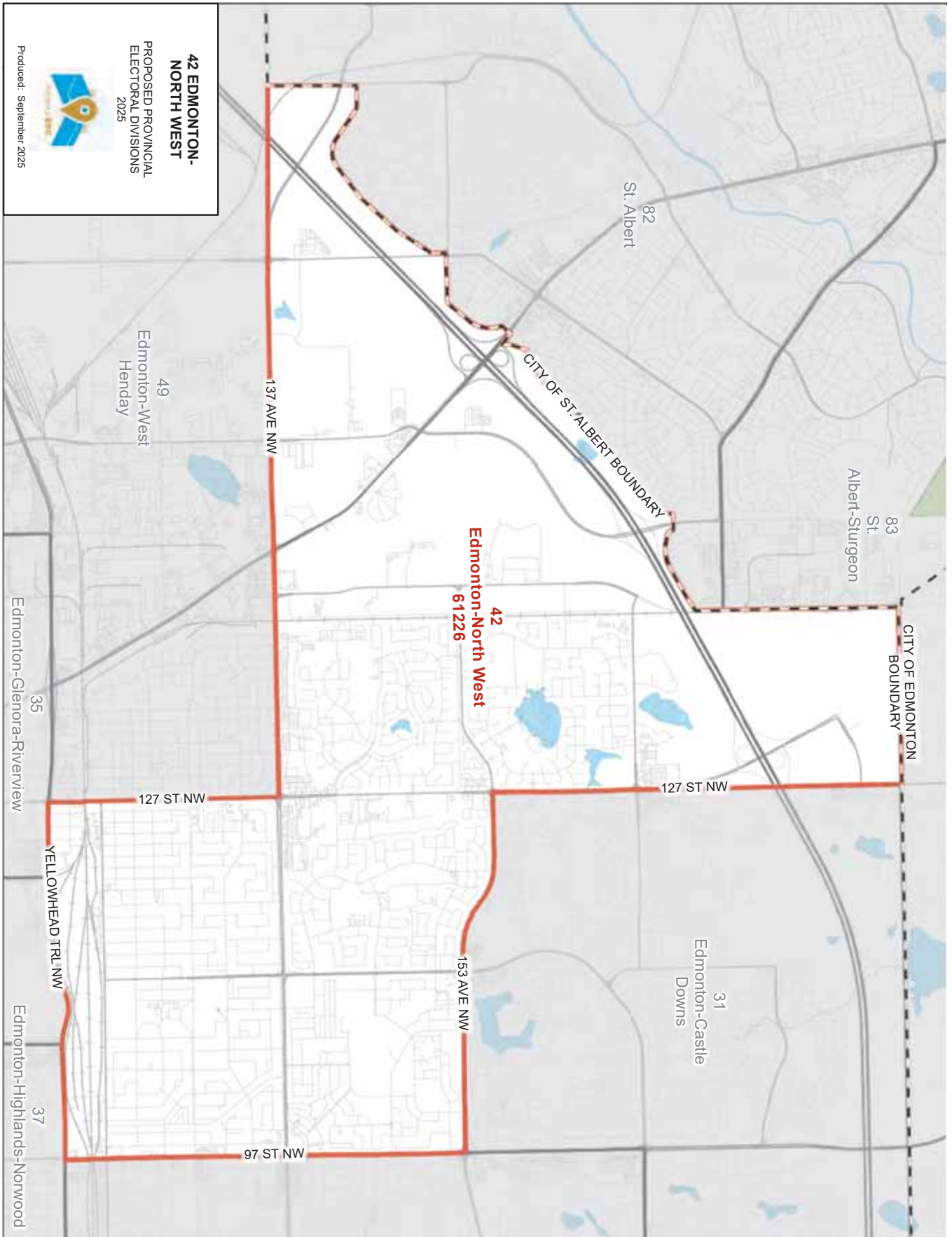
PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025

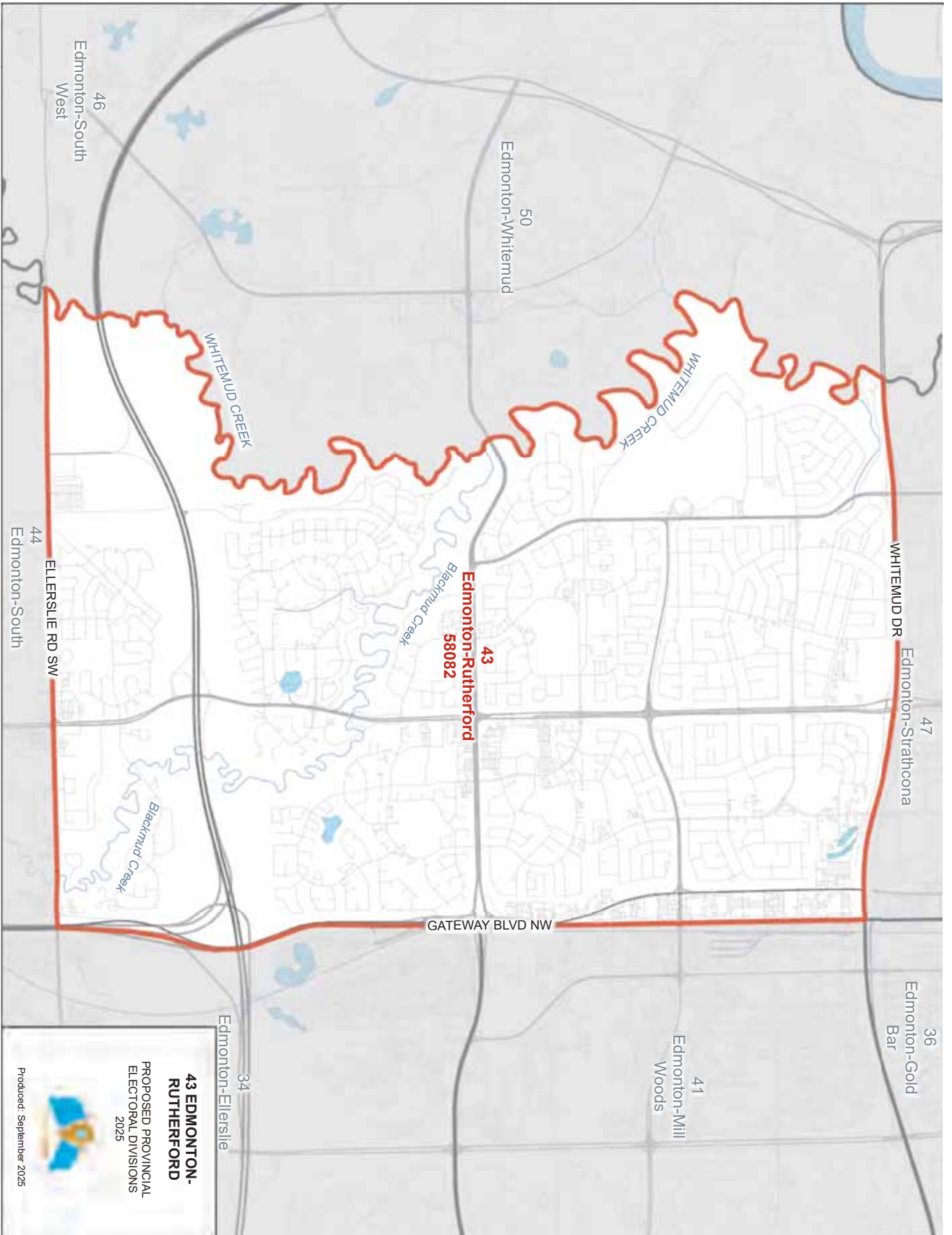


Produced: September 2025







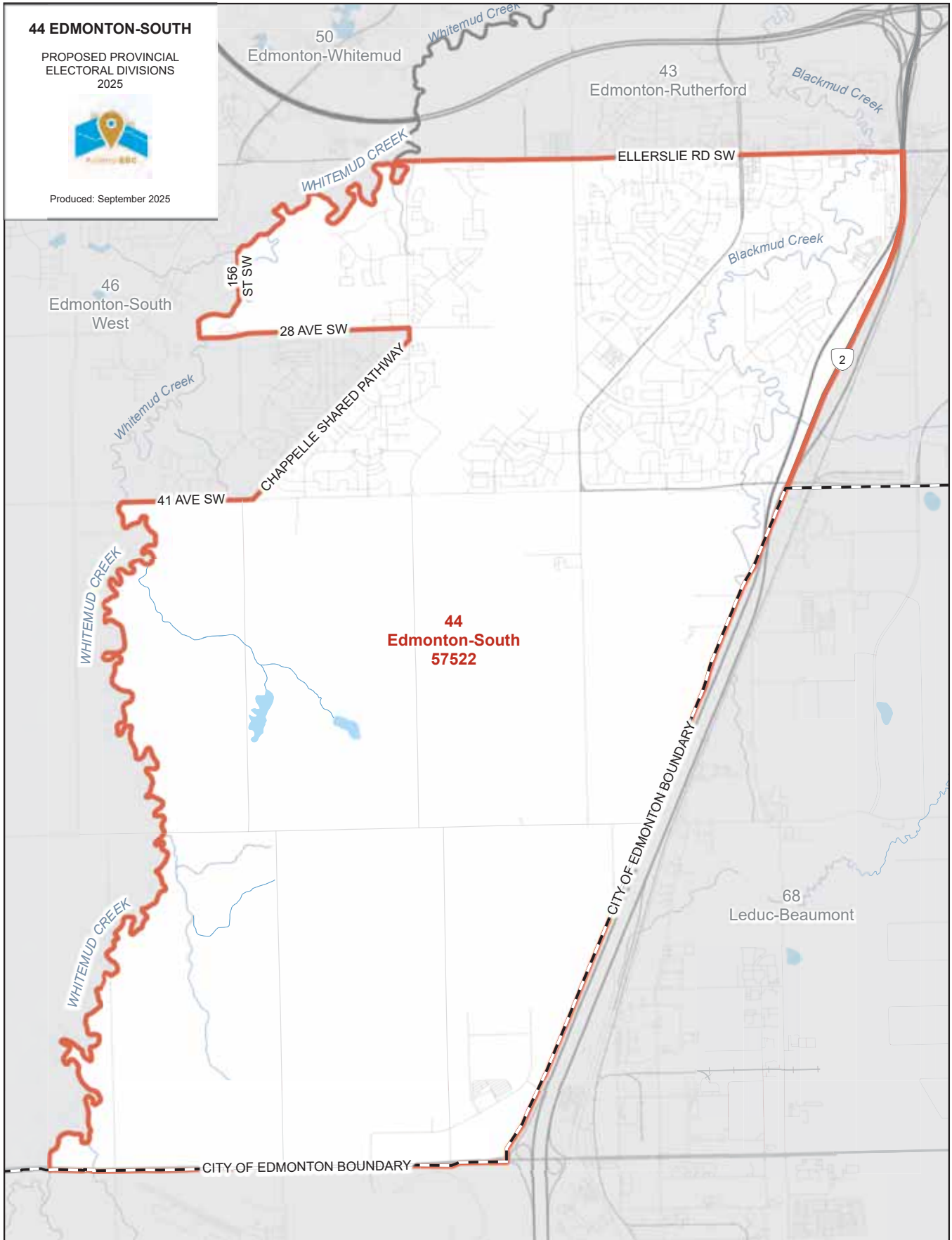


44 EDMONTON-SOUTH

PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025



Produced: September 2025

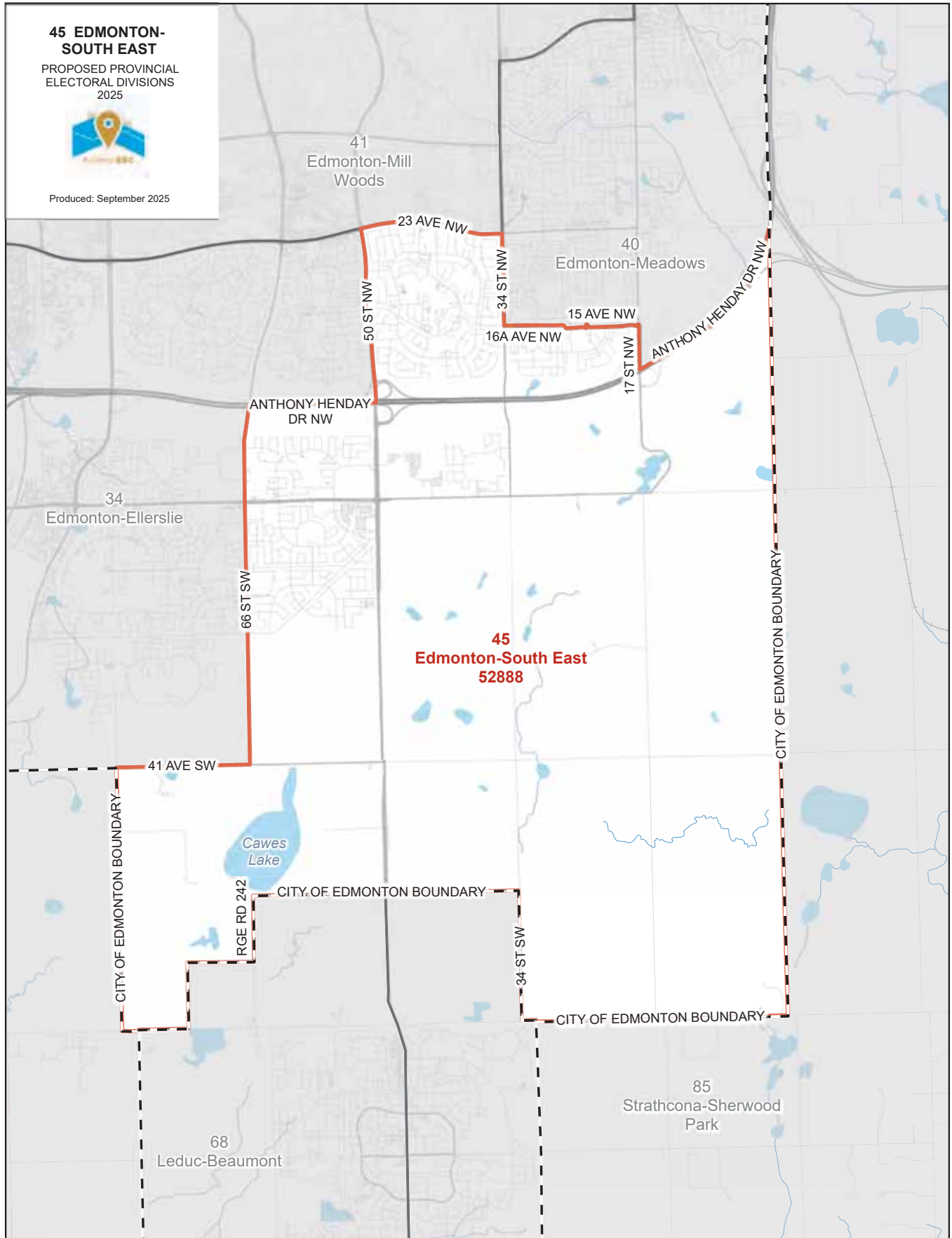


45 EDMONTON-SOUTH EAST

PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025



Produced: September 2025

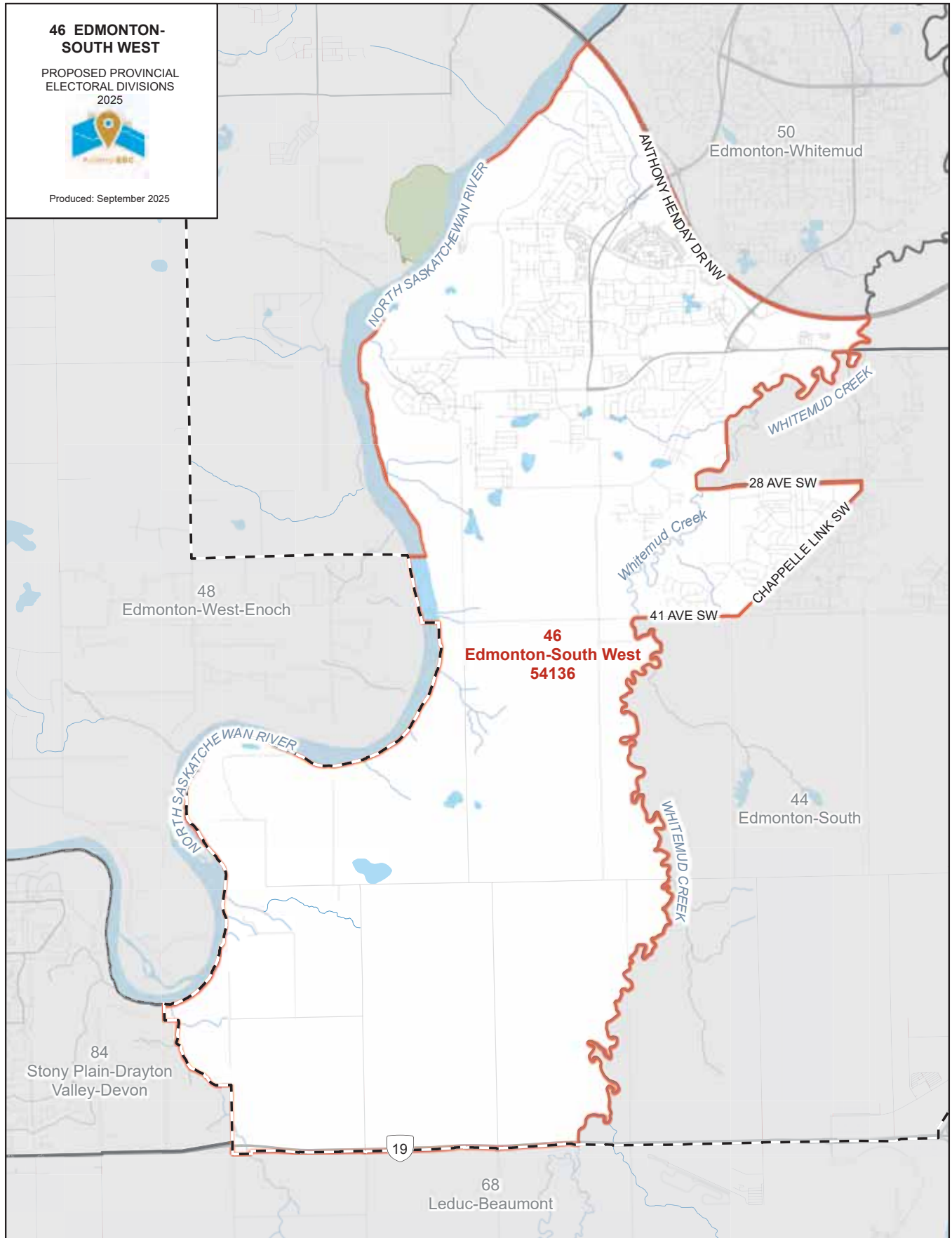


46 EDMONTON-SOUTH WEST

PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025



Produced: September 2025

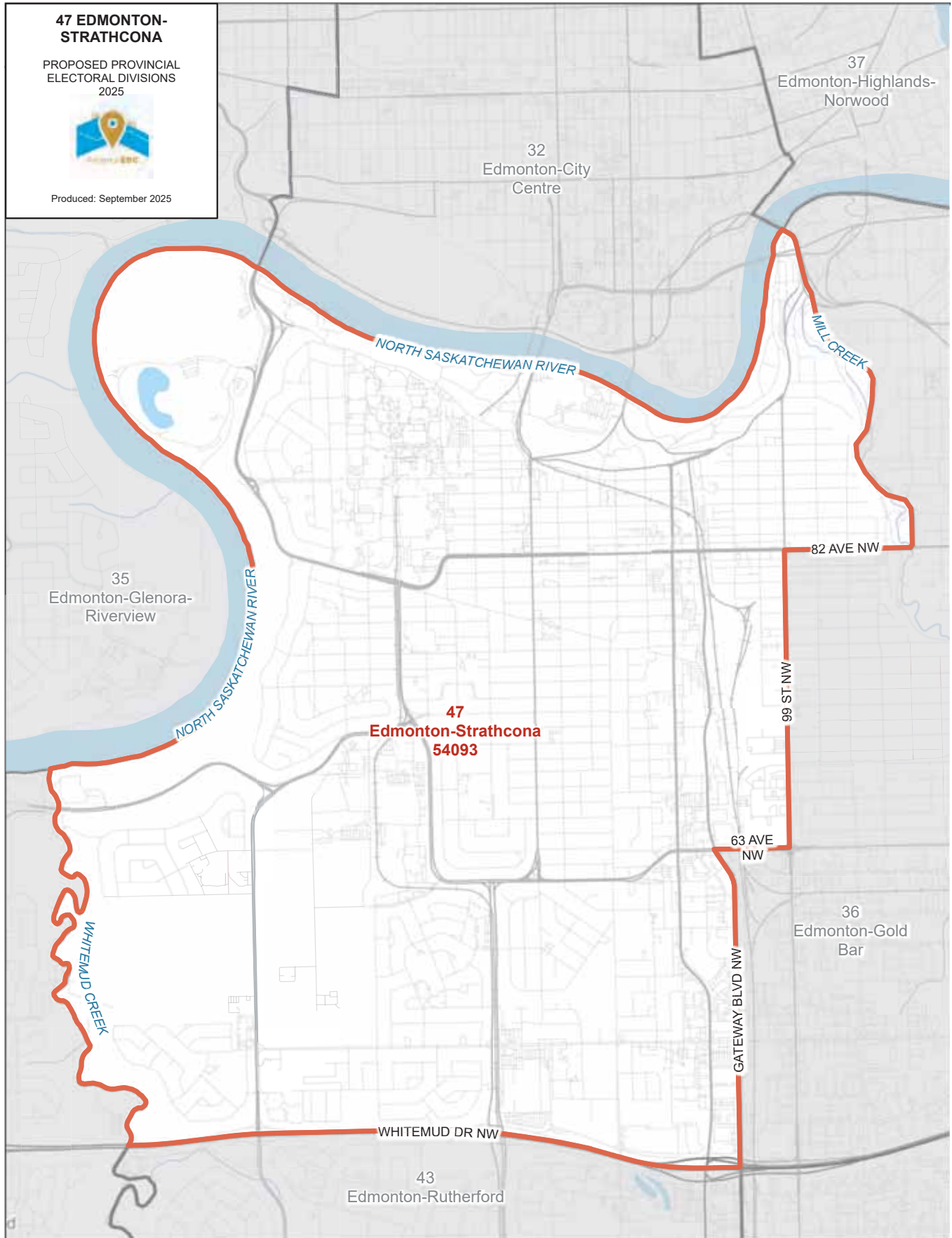


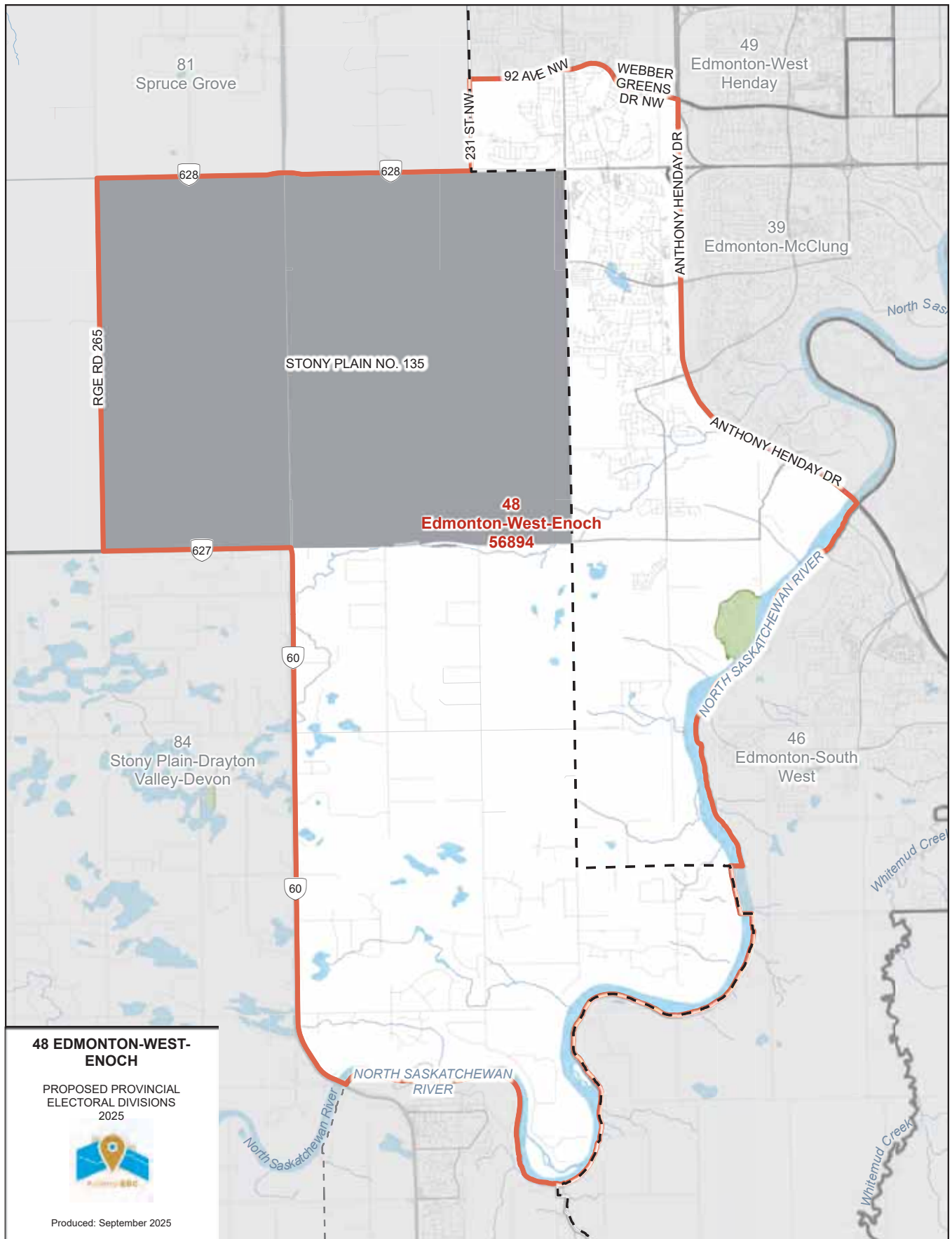
**47 EDMONTON-
STRATHCONA**

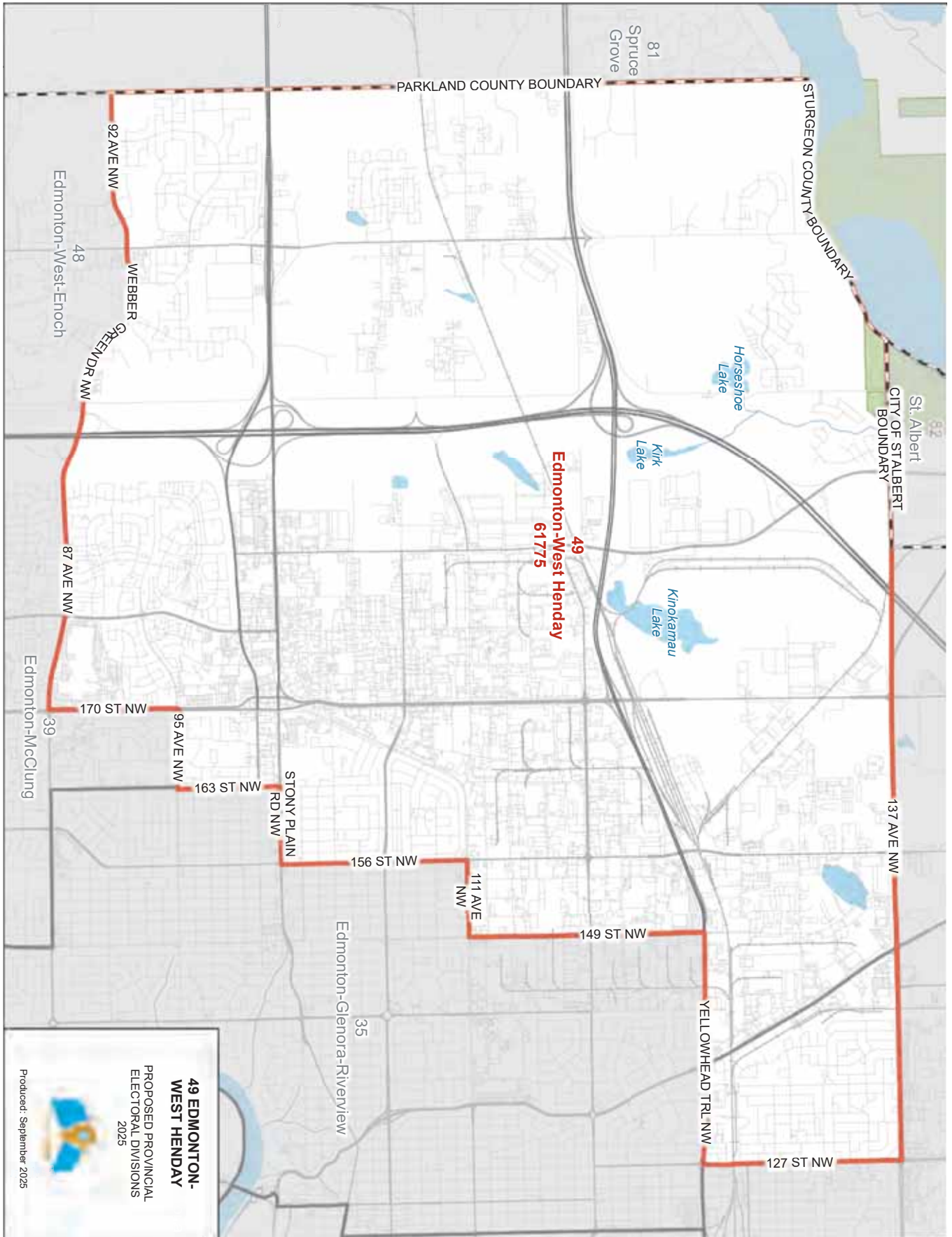
PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025

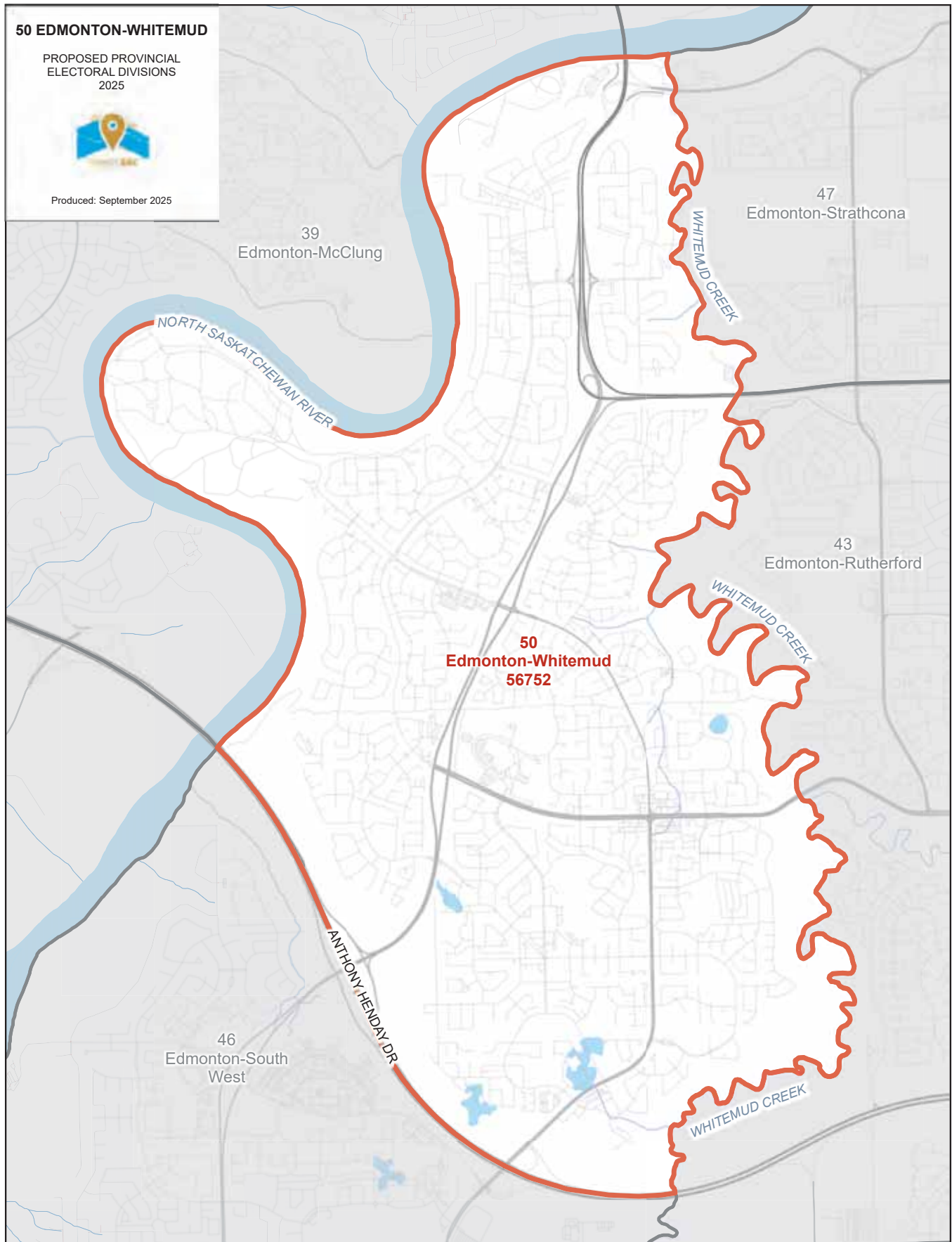


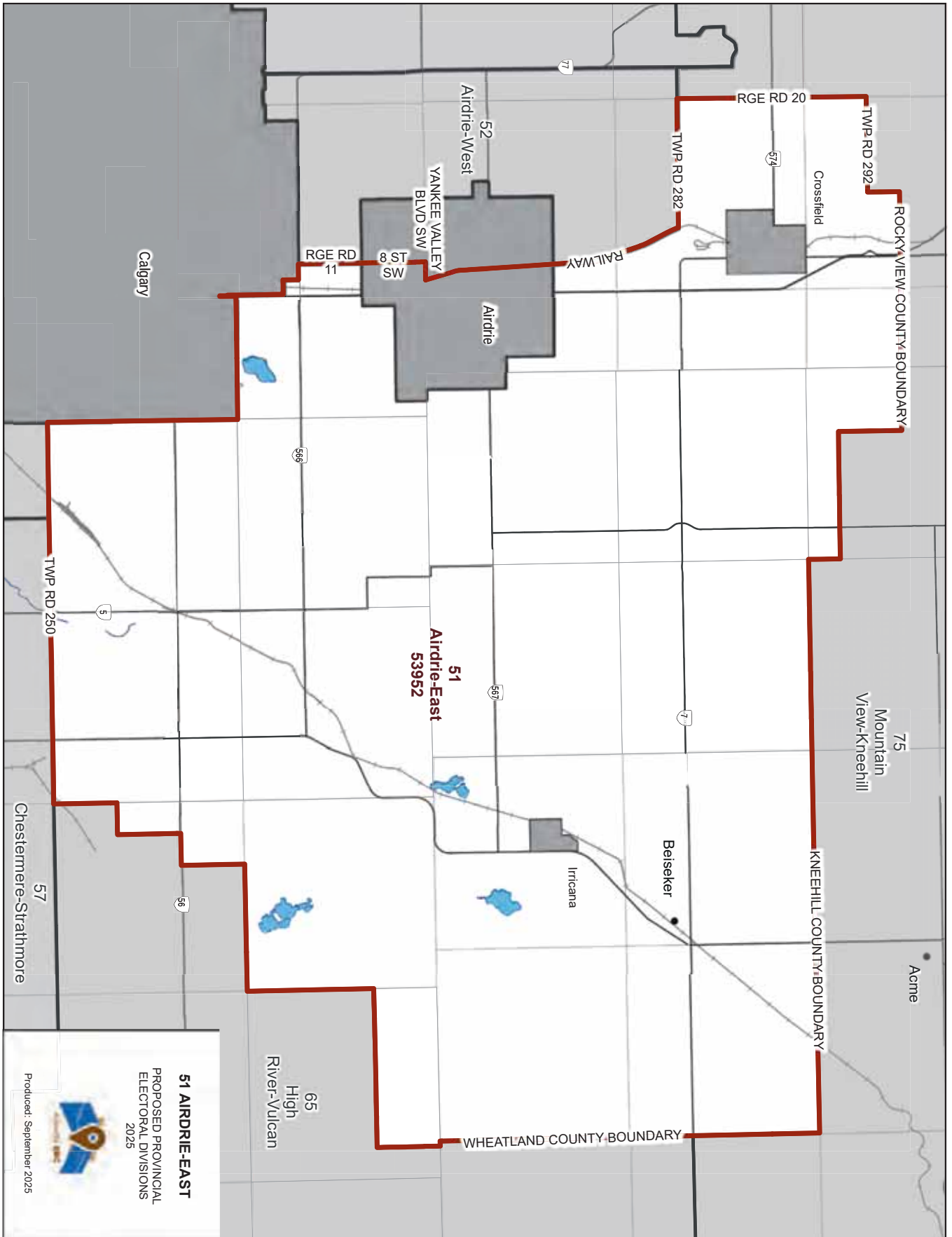
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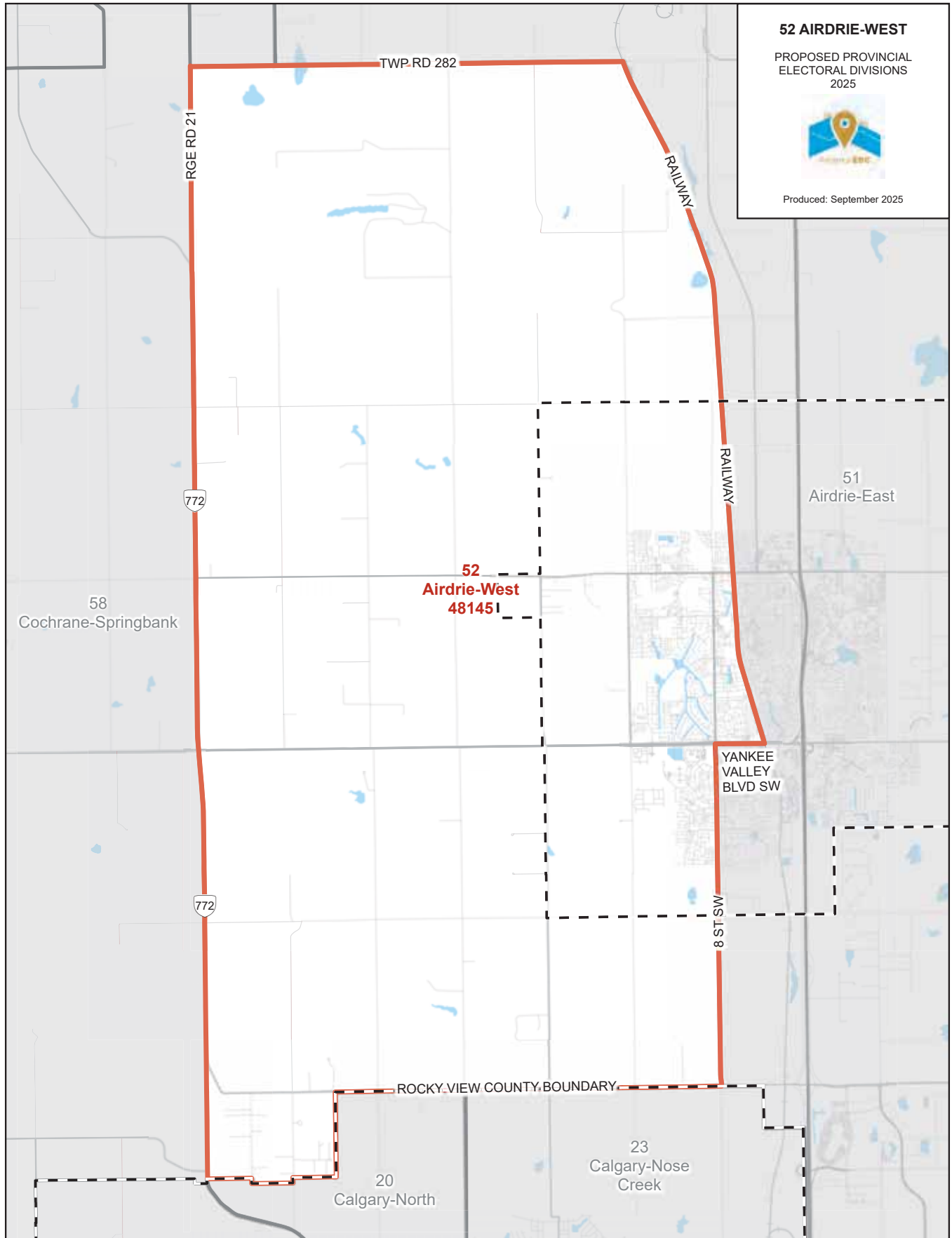


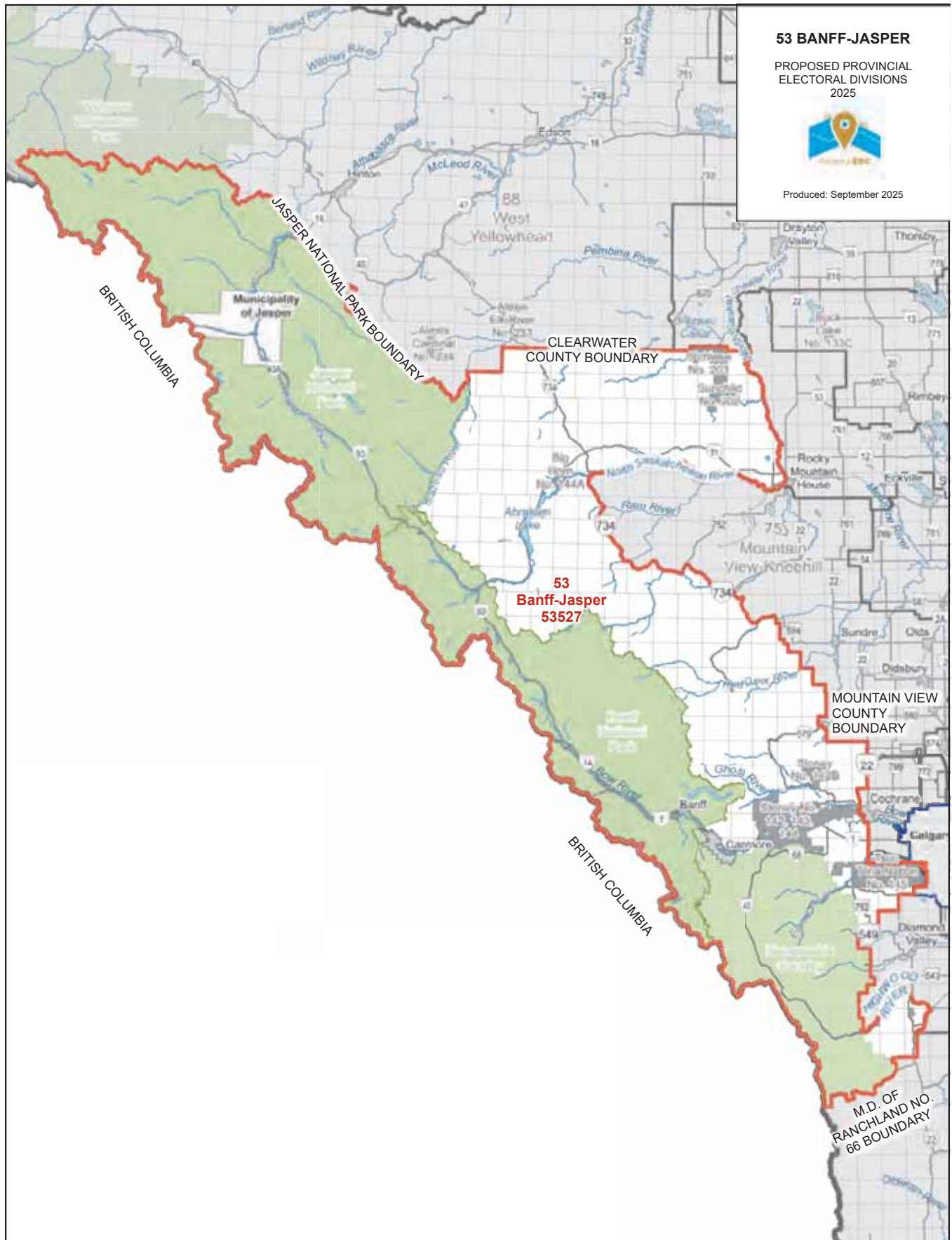










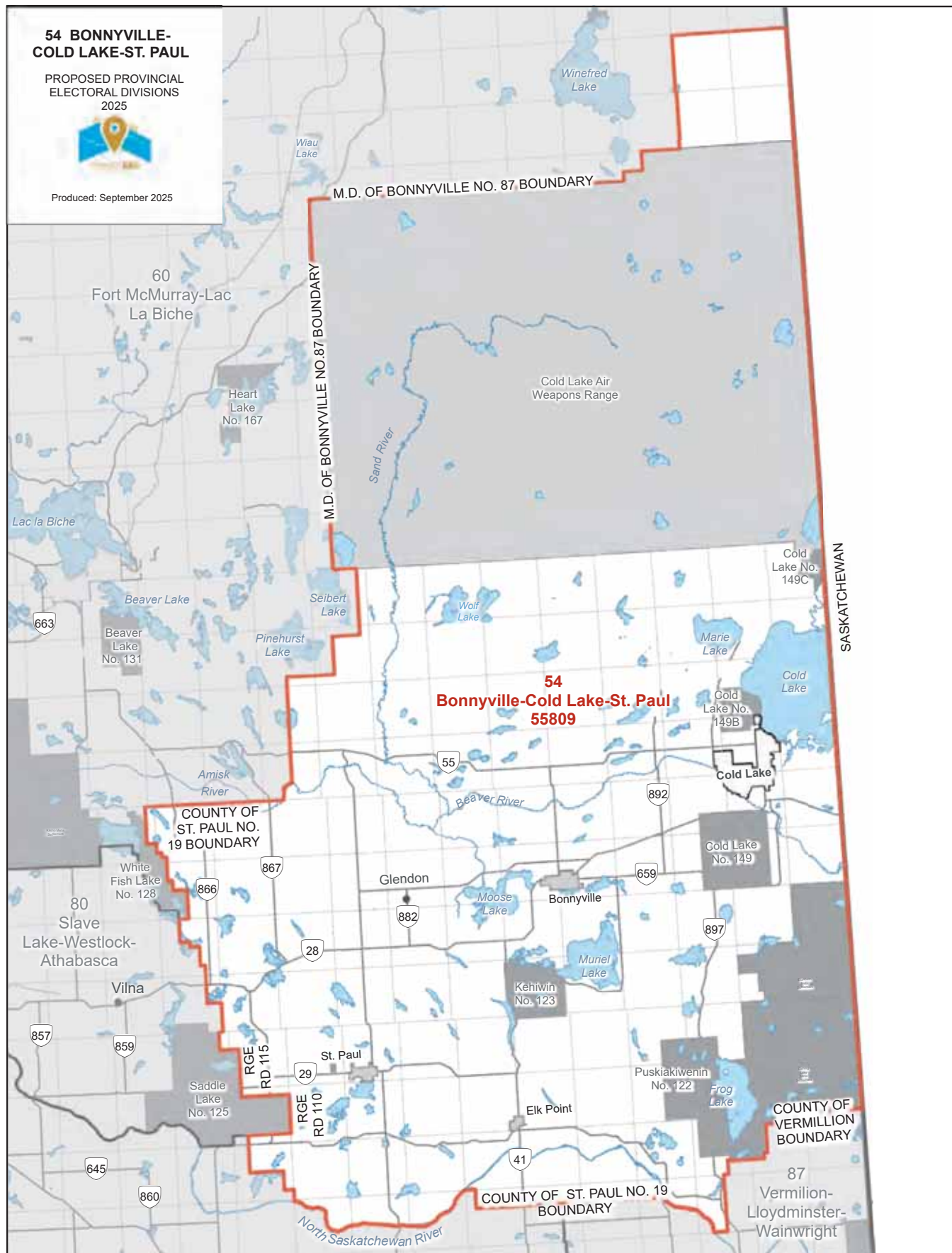


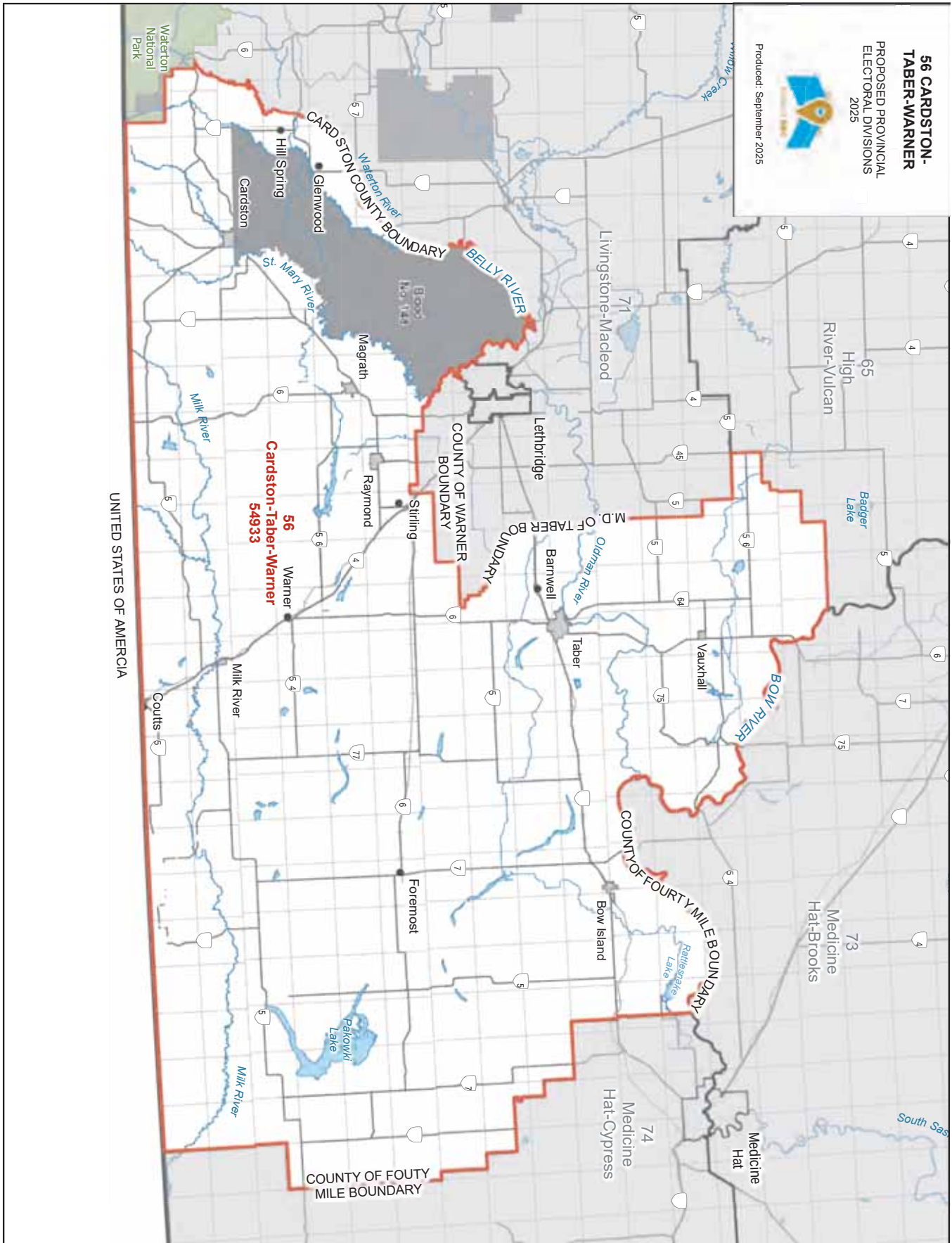
54 BONNYVILLE-COLD LAKE-ST. PAUL

PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025



Produced: September 2025

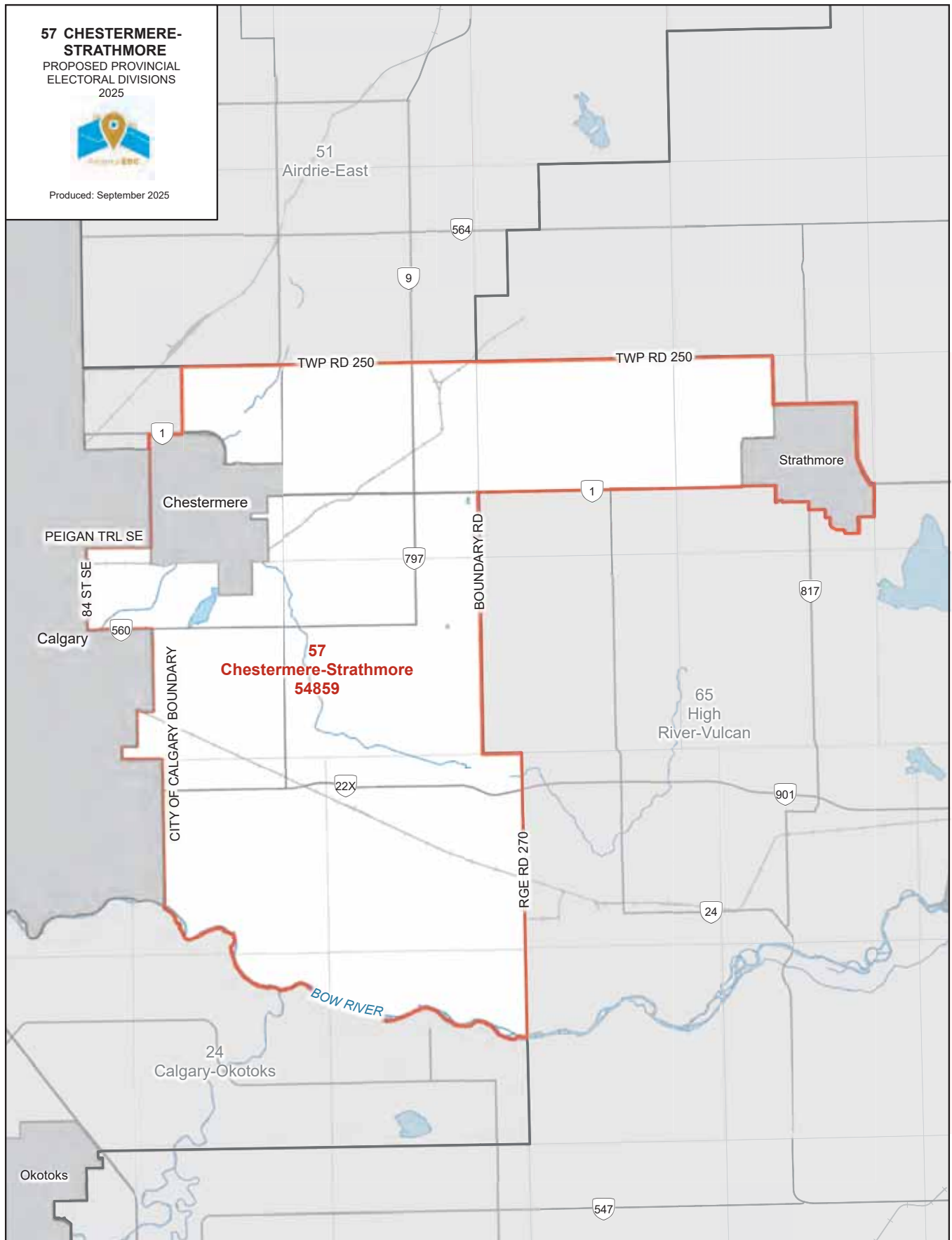




**57 CHESTERMERE-
STRATHMORE**
PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025



Produced: September 2025

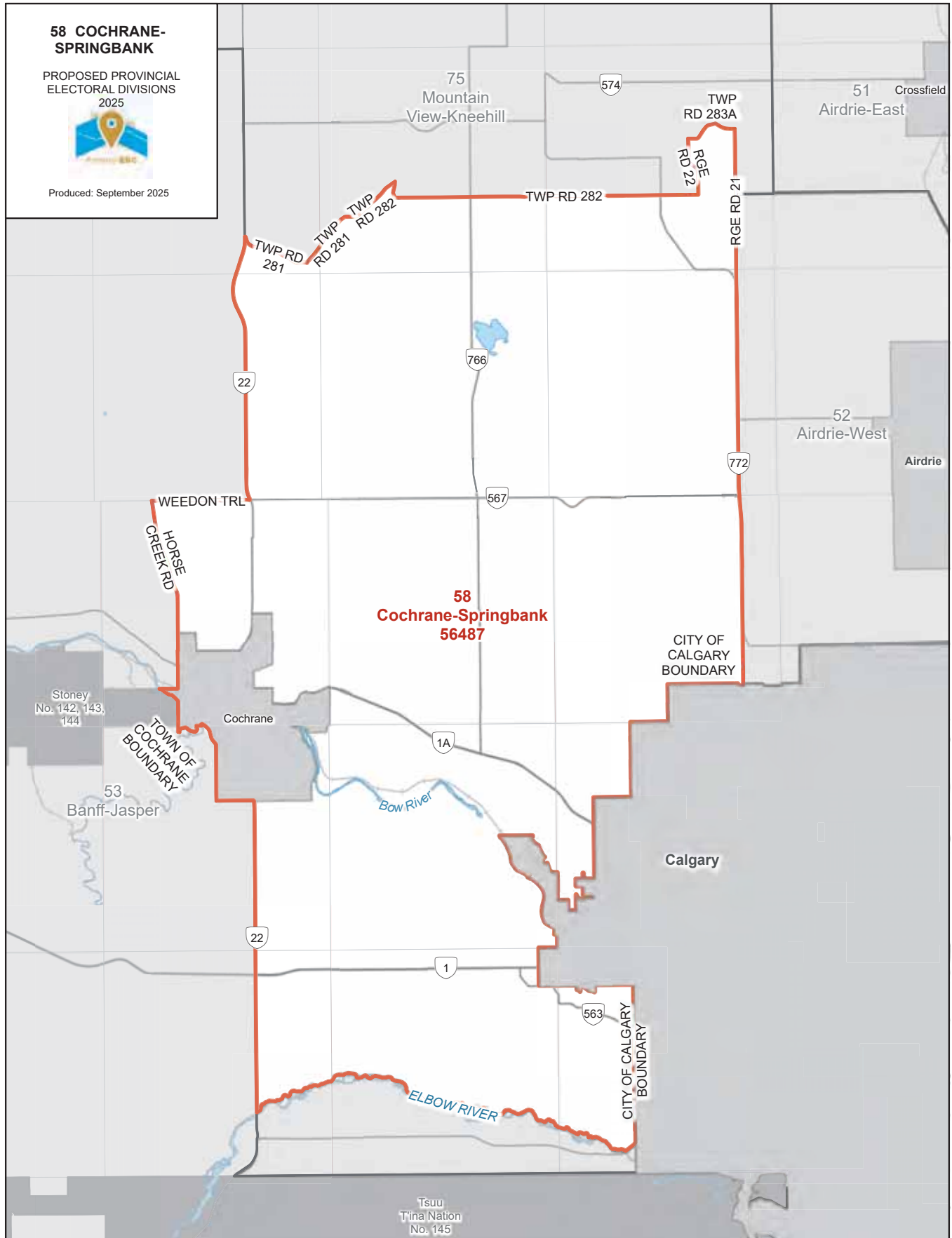


**58 COCHRANE-
SPRINGBANK**

PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025



Produced: September 2025

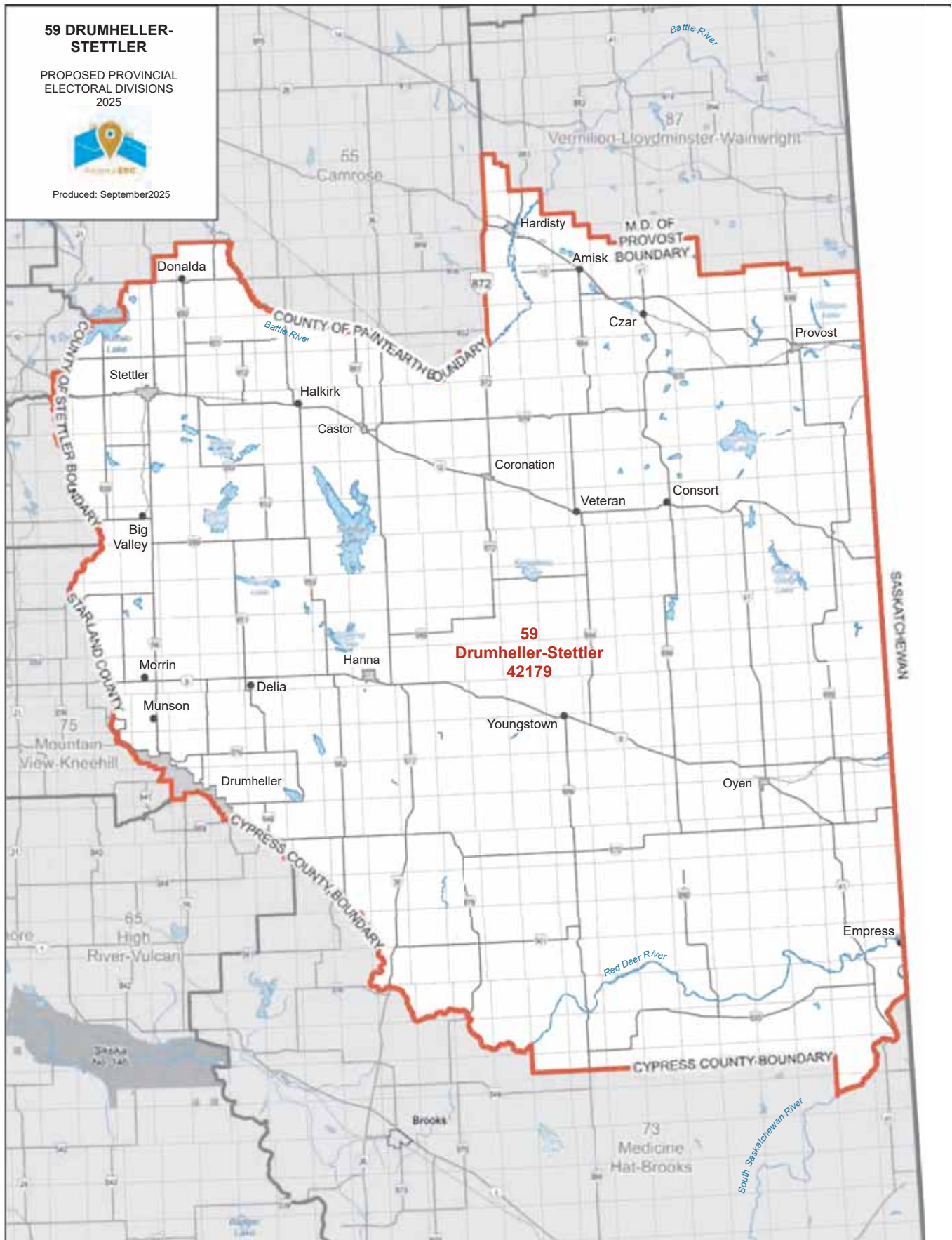


59 DRUMHELLER-STETTLER

PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025



Produced: September 2025

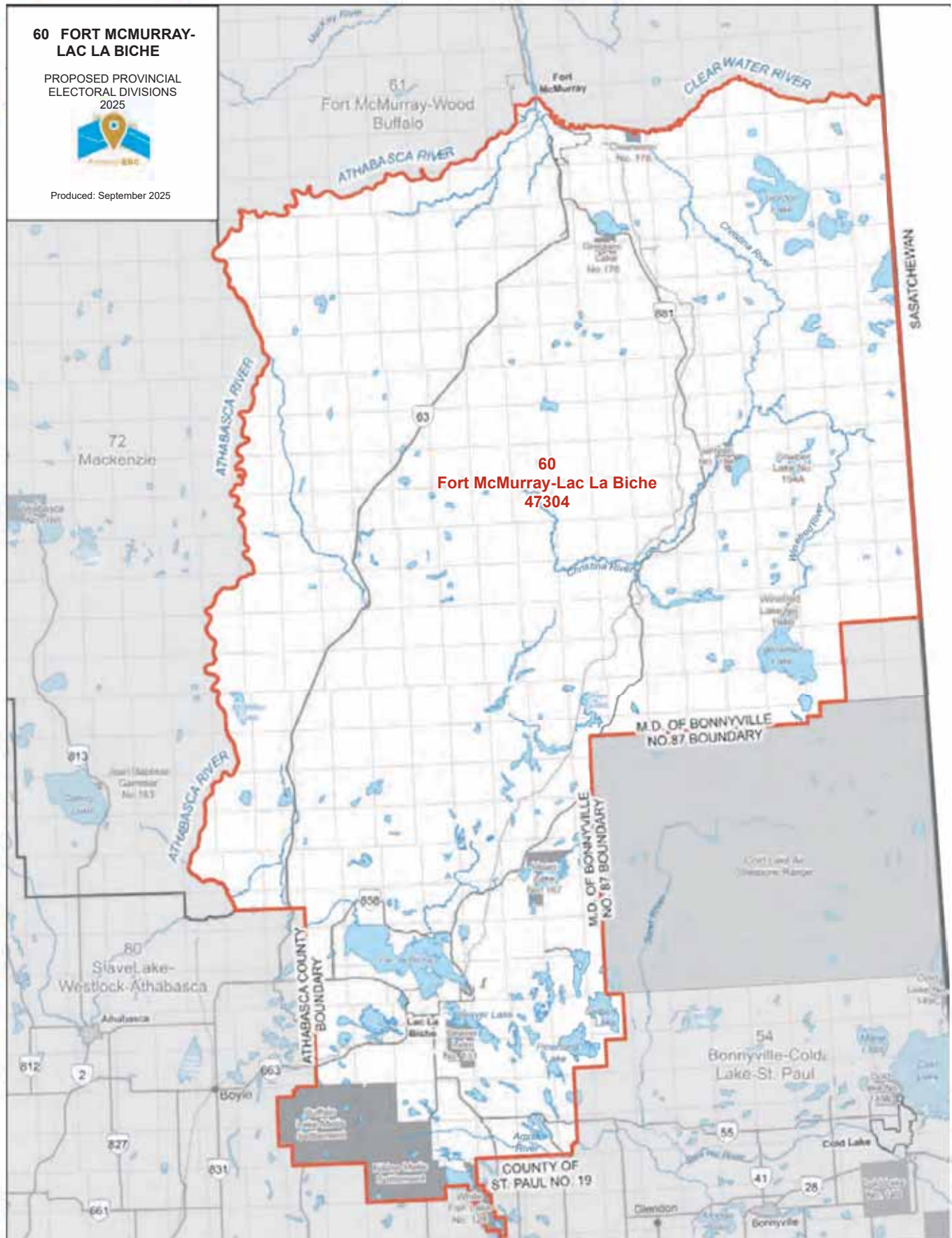


**60 FORT MCMURRAY-
LAC LA BICHE**

PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025



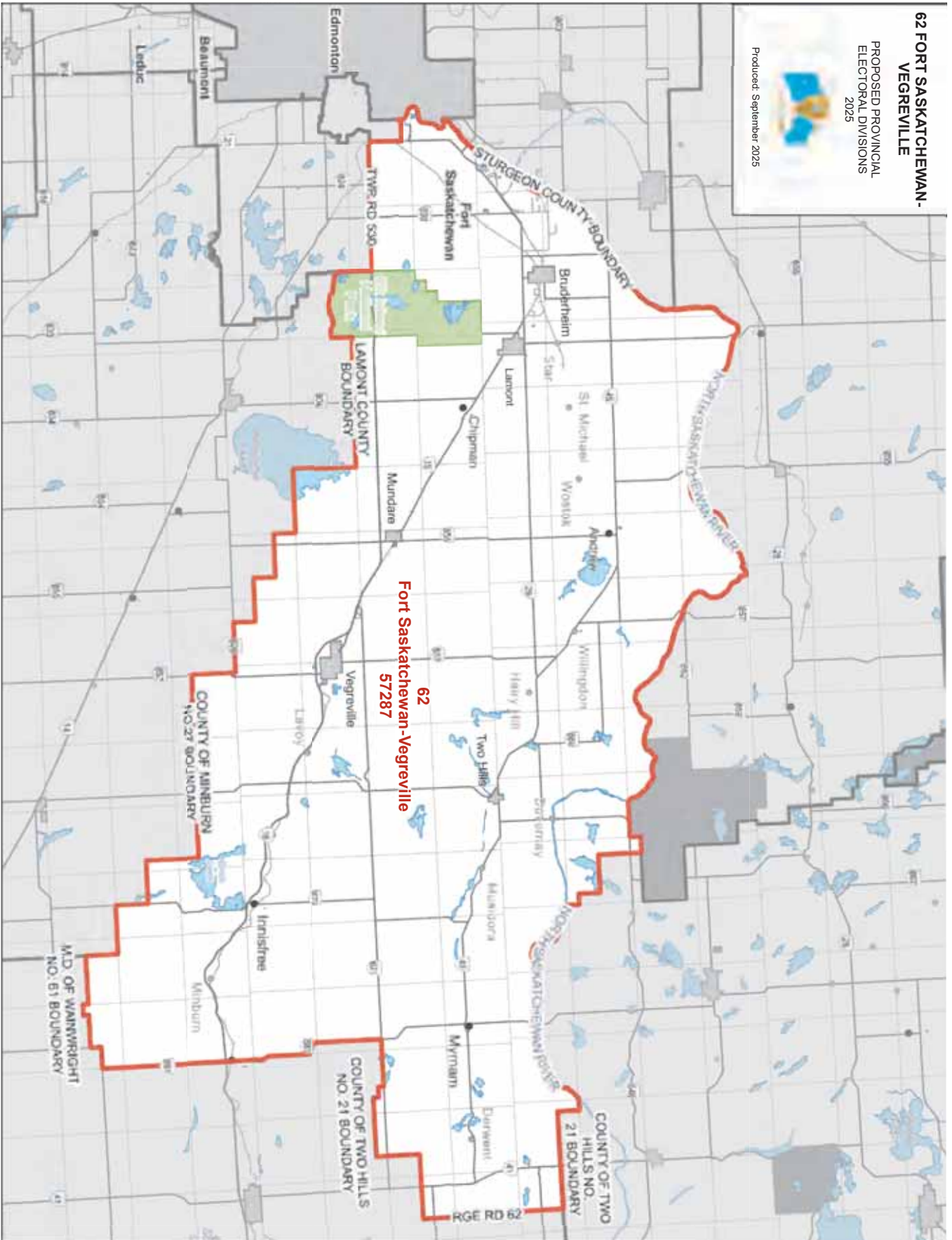
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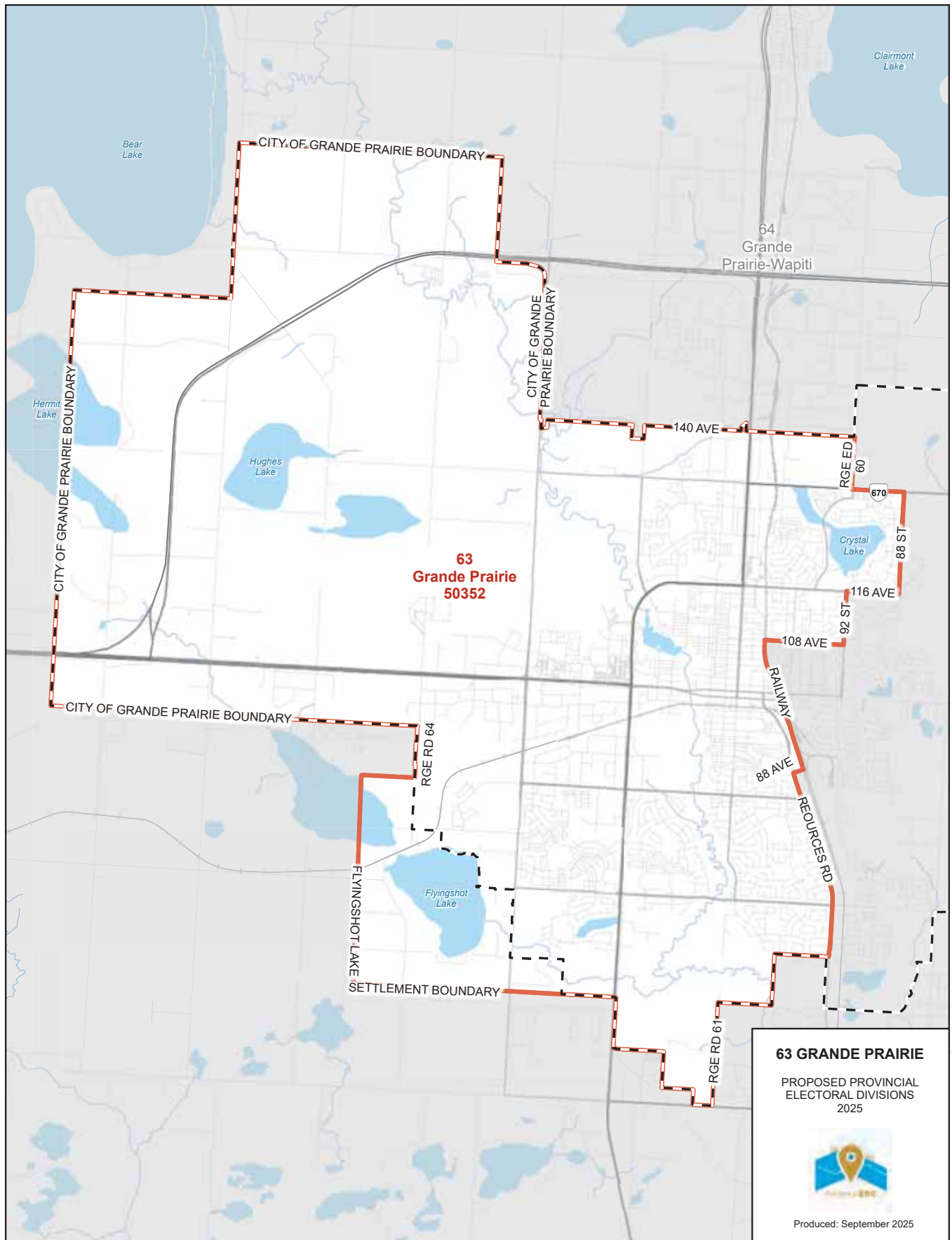


**62 FORT SASKATCHEWAN-
VEGREVILLE**

PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025

Produced: September 2025





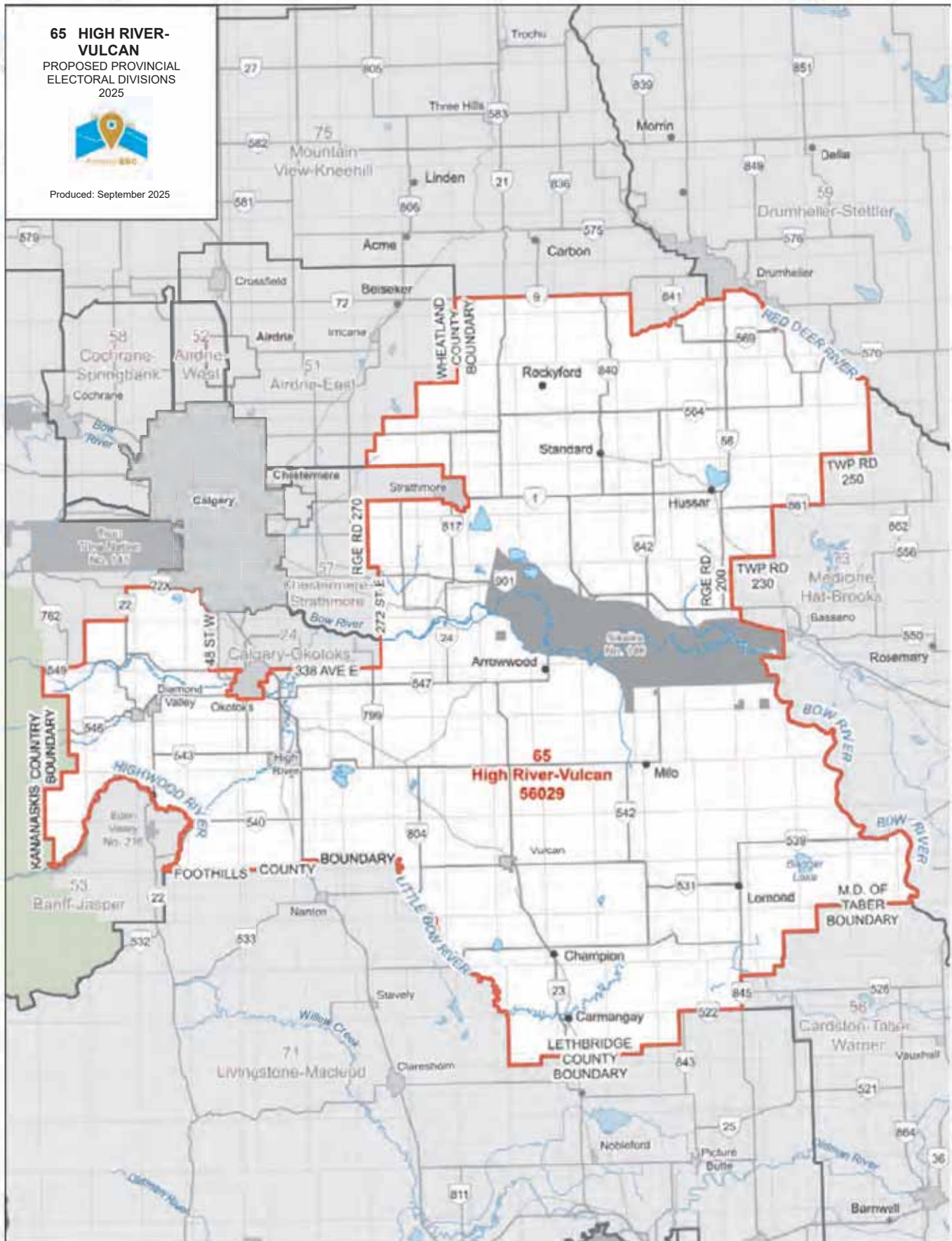


65 HIGH RIVER- VULCAN

PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025



Produced: September 2025

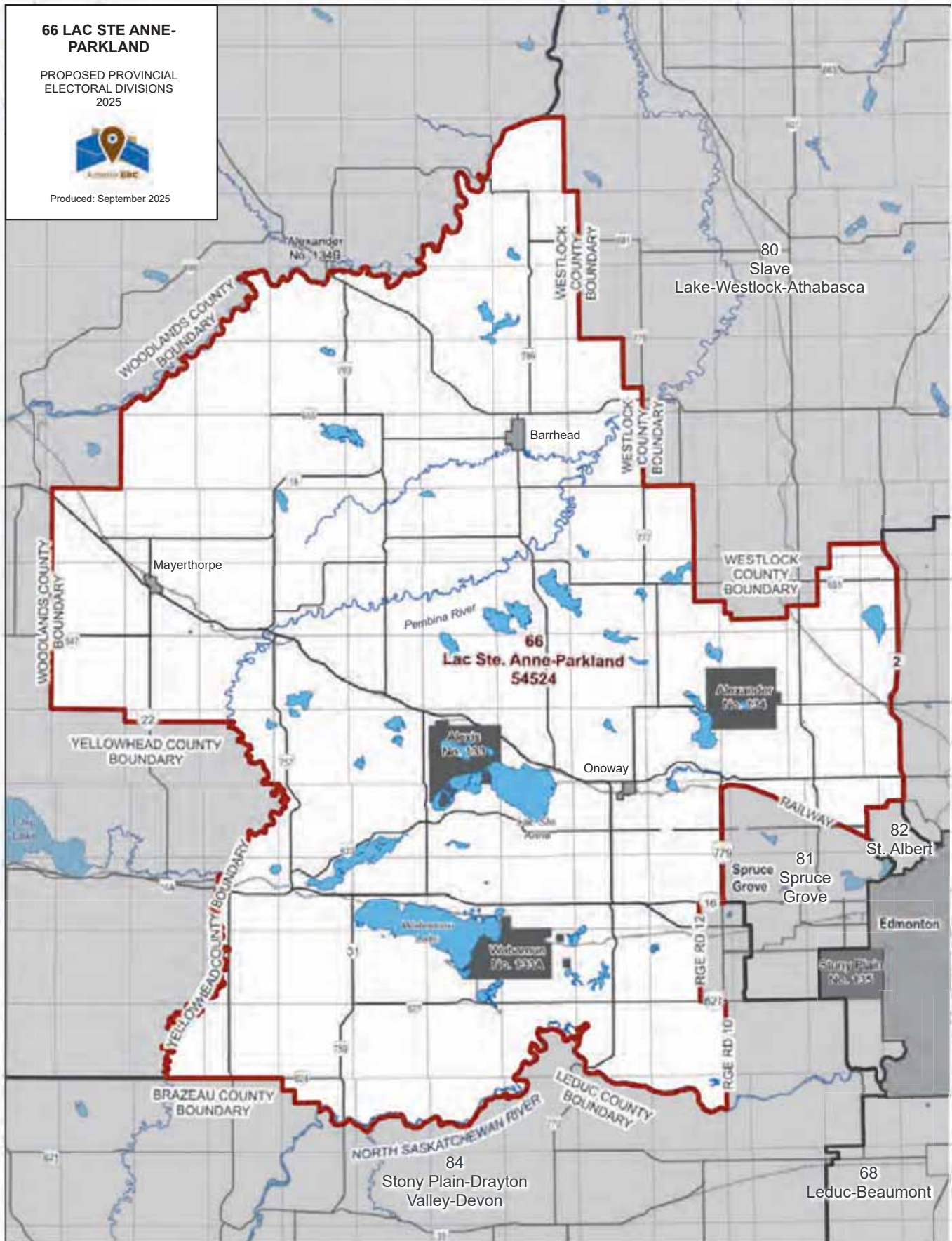


**66 LAC STE ANNE-
PARKLAND**

PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025



Produced: September 2025

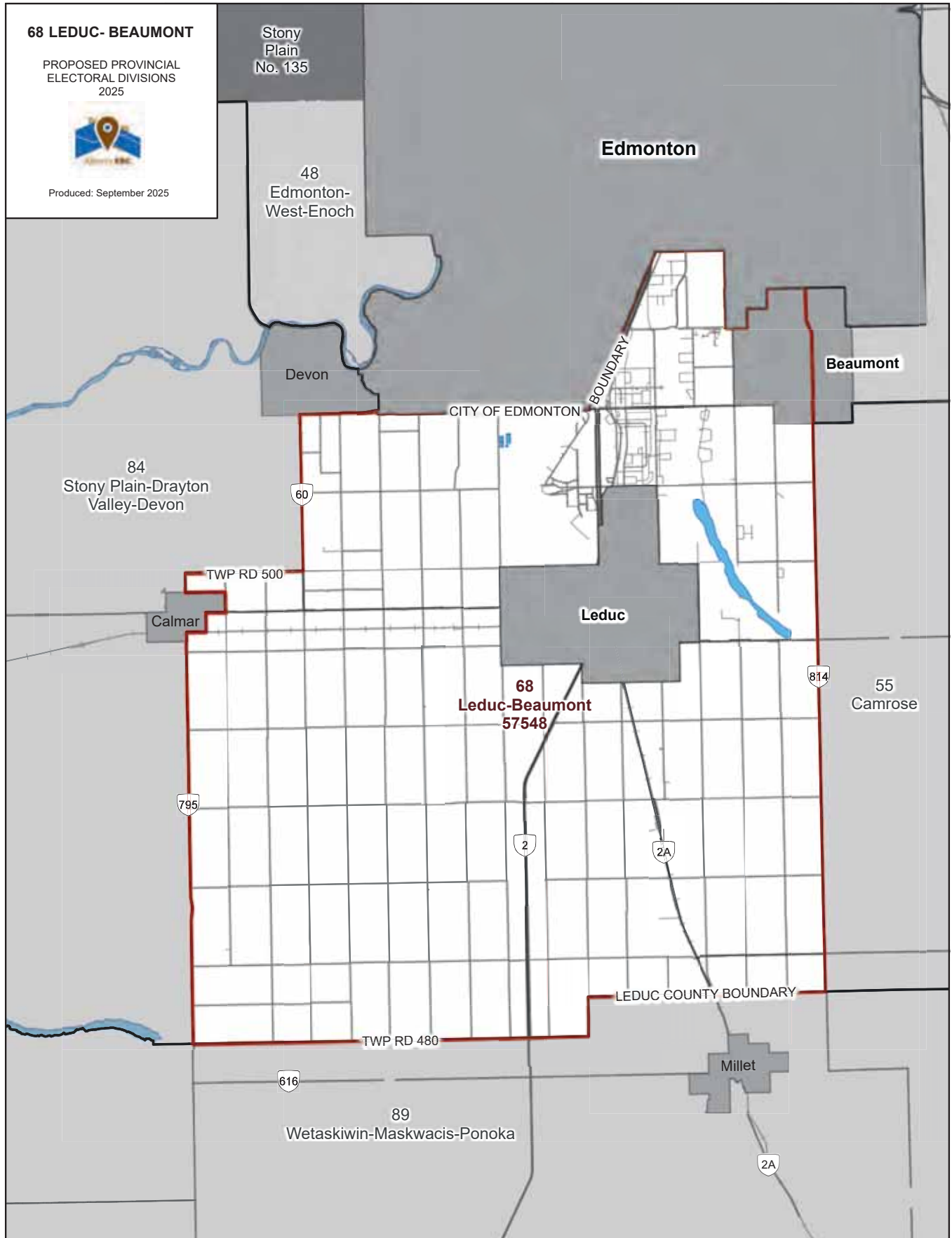


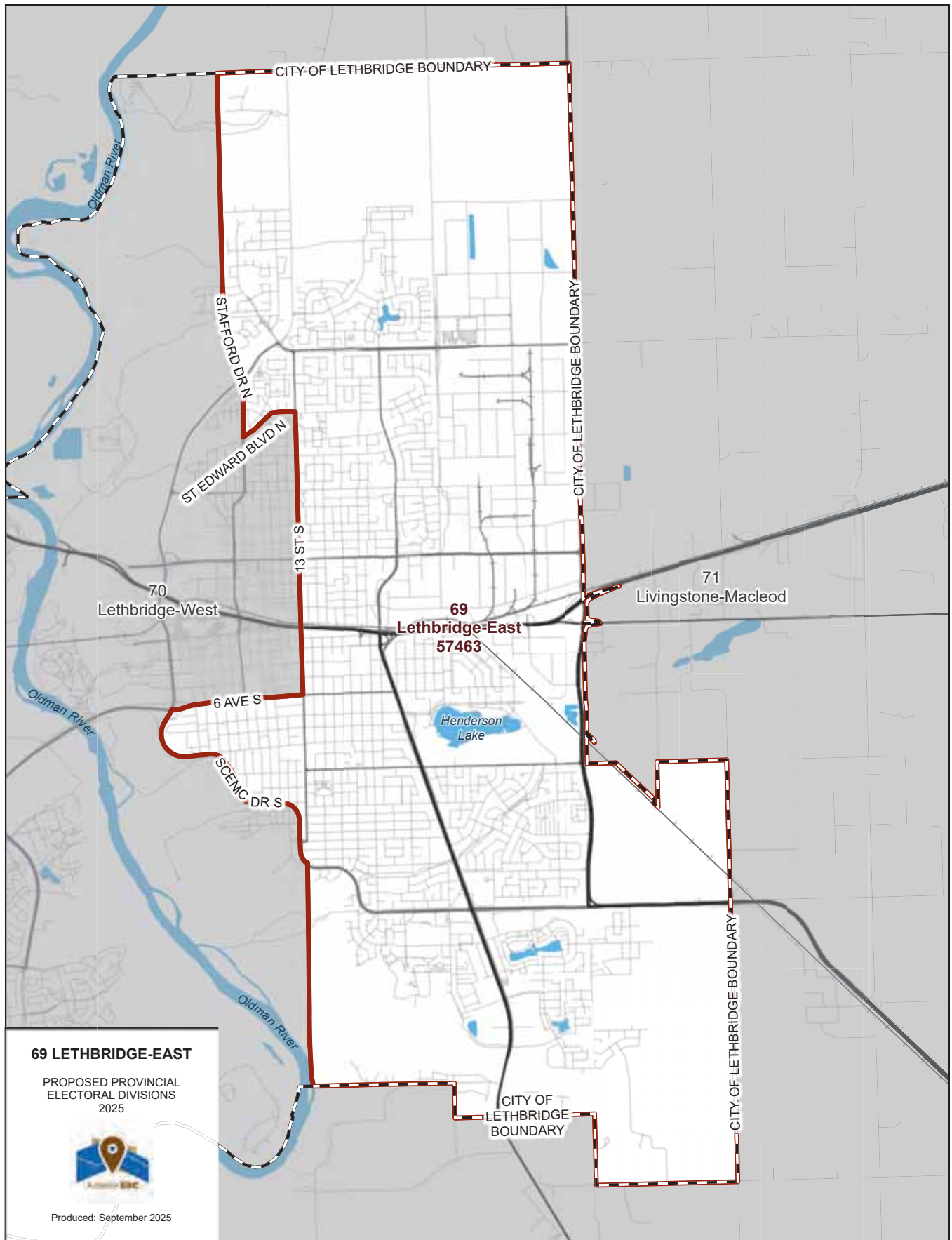
68 LEDUC- BEAUMONT

PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025



Produced: September 2025



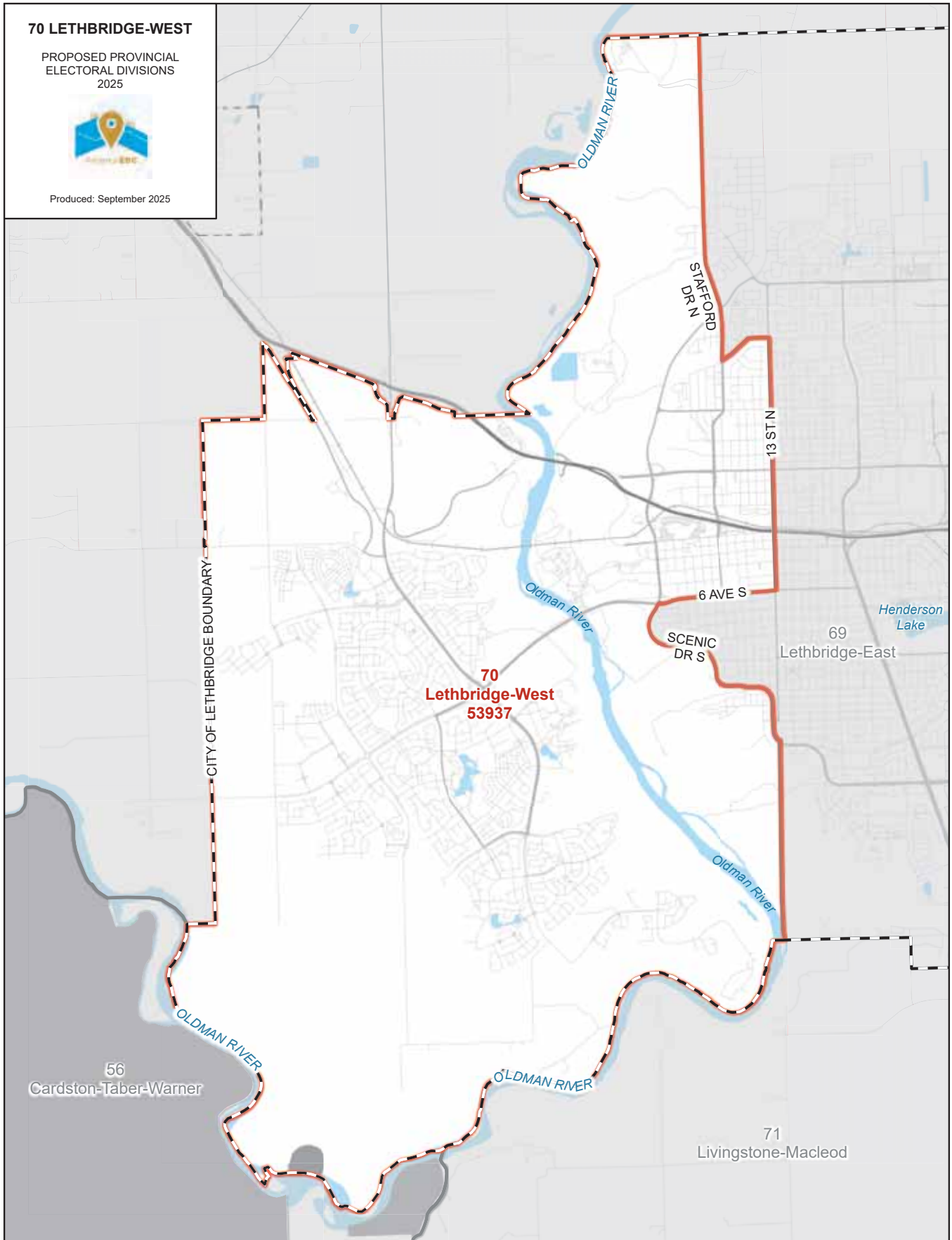


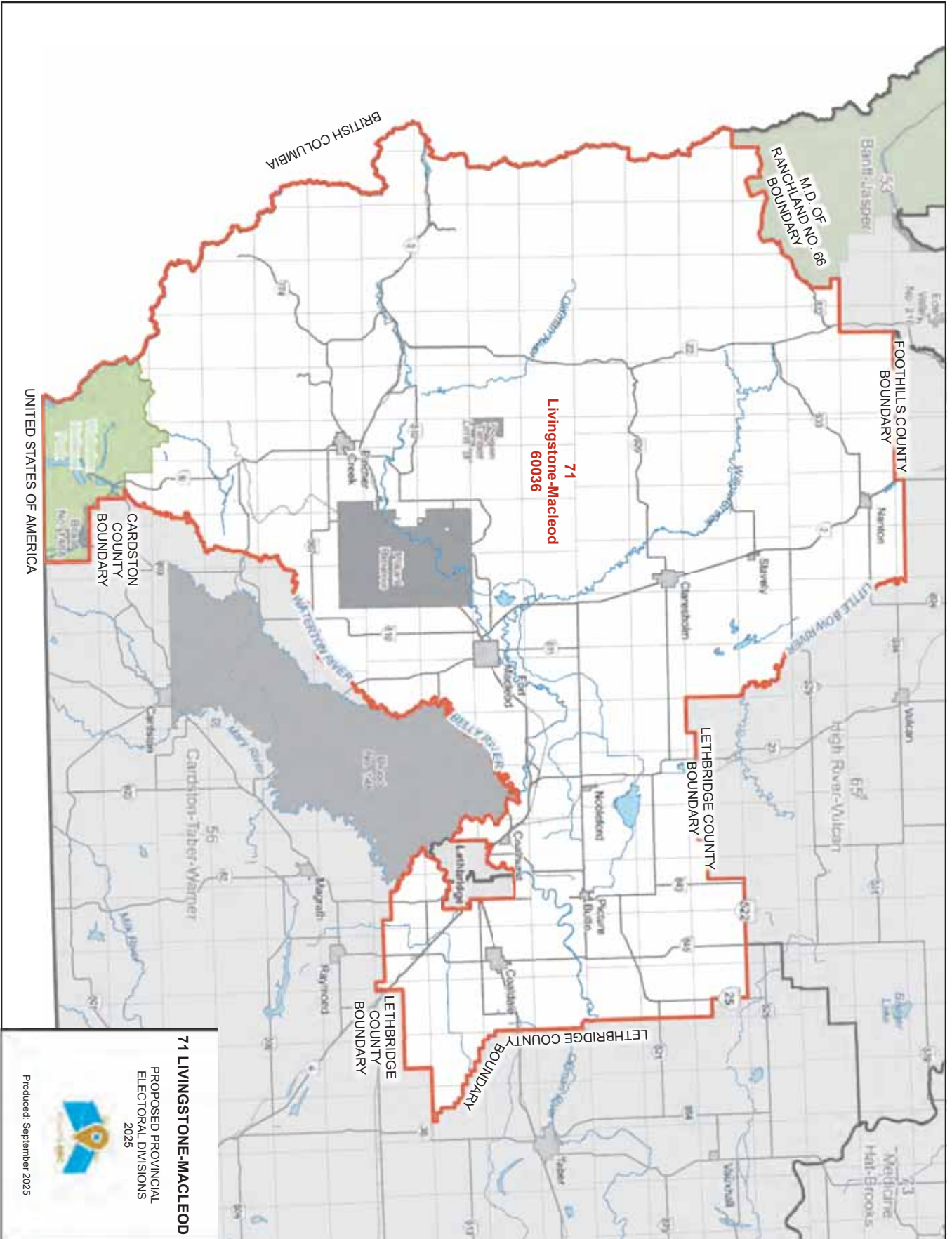
70 LETHBRIDGE-WEST

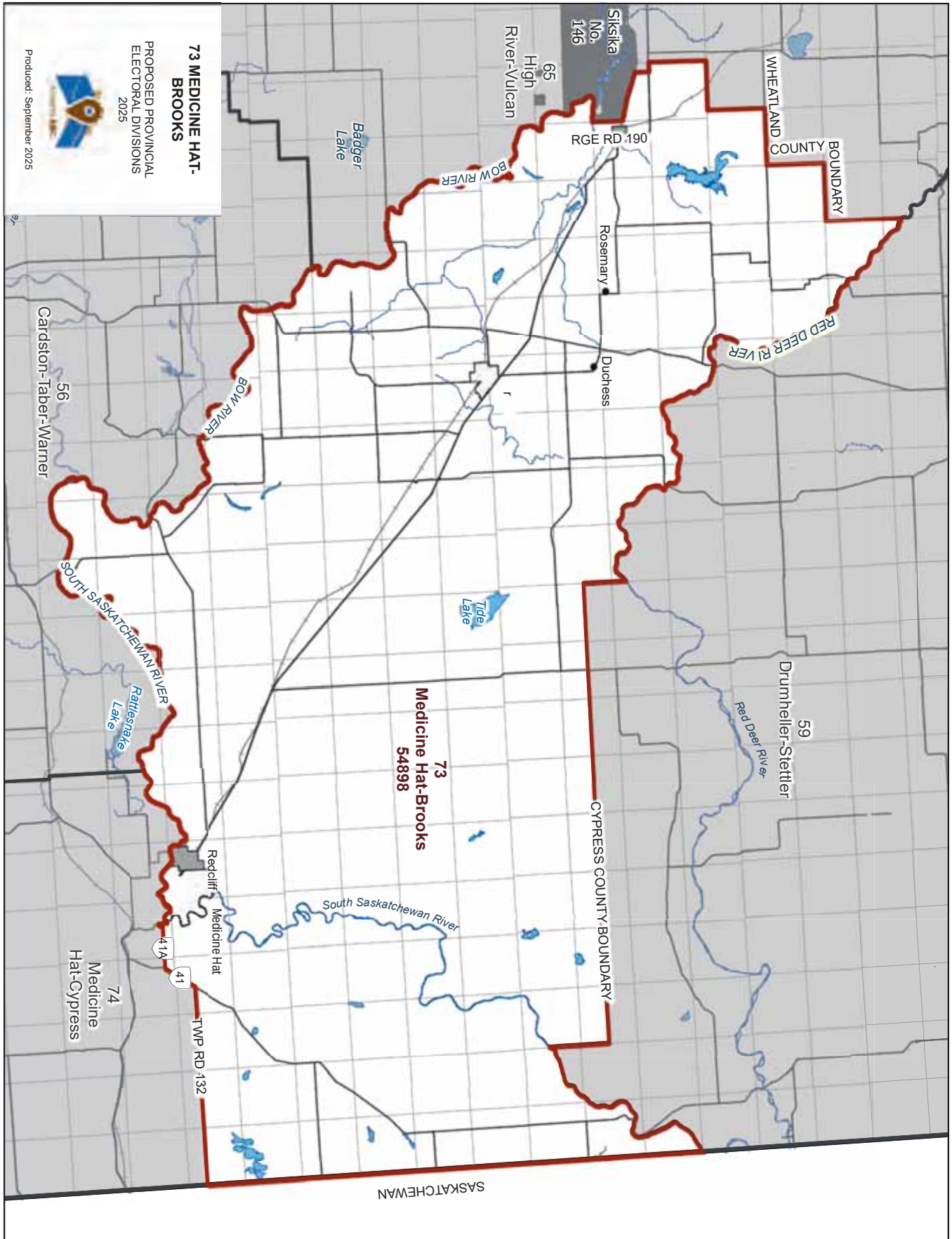
PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025

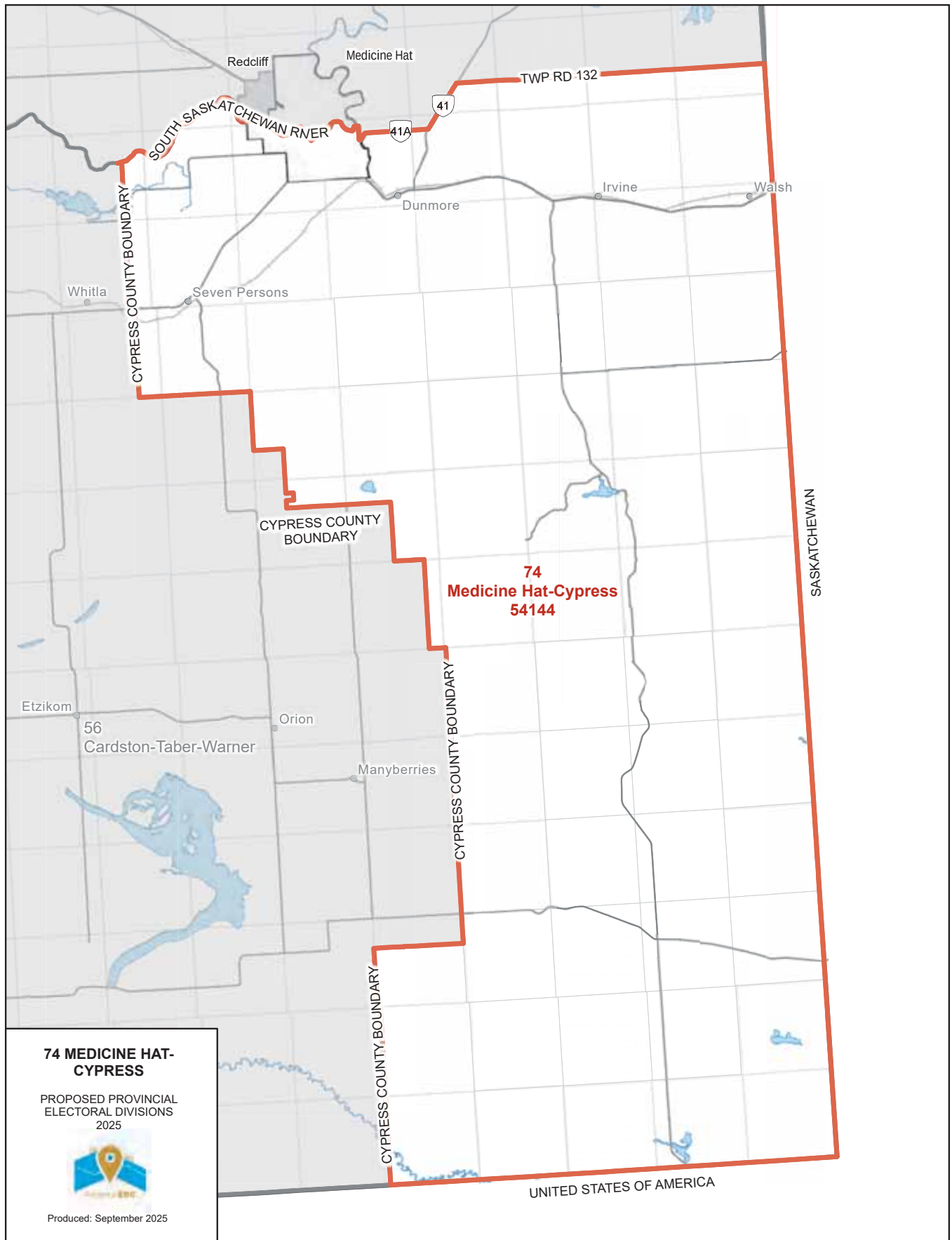


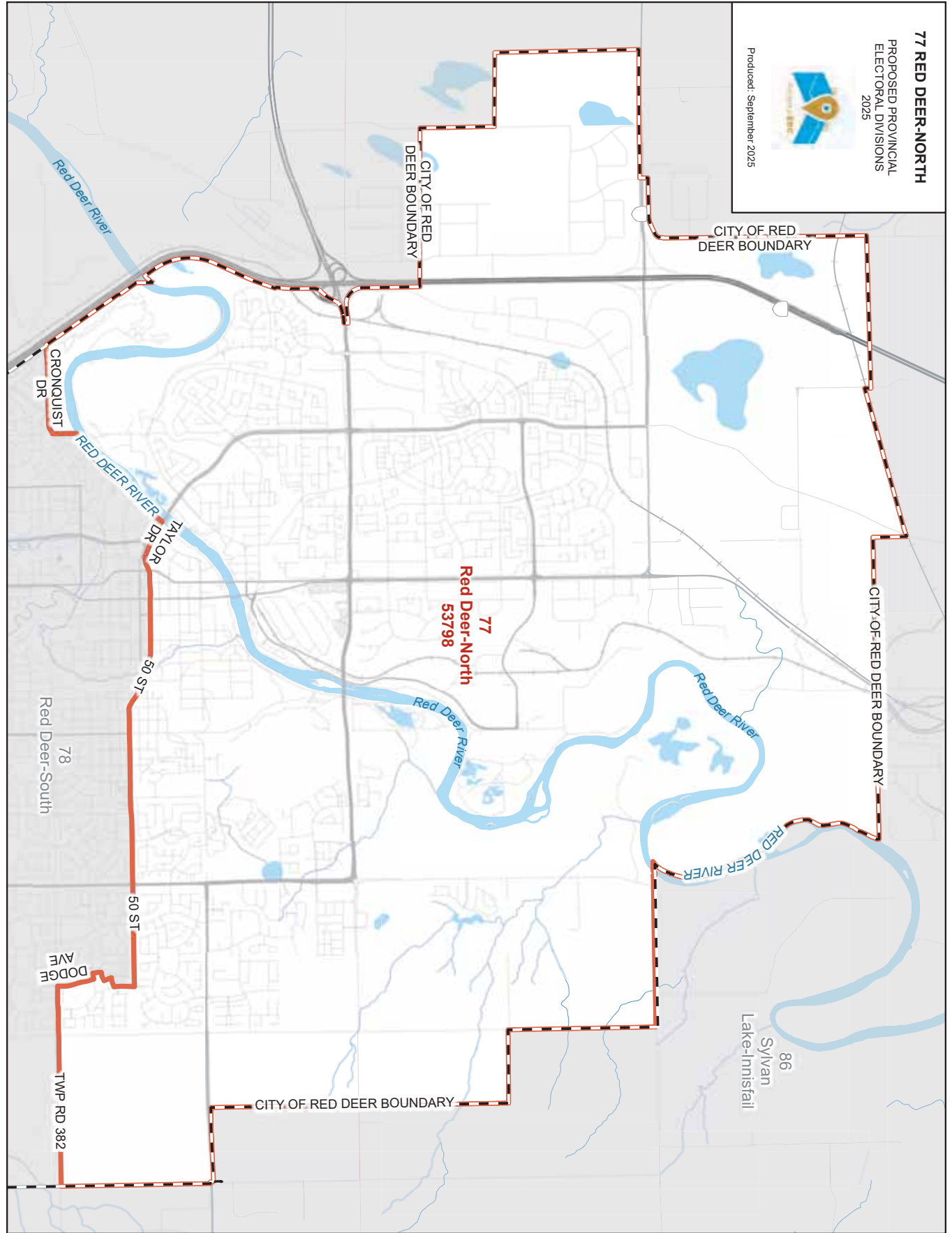
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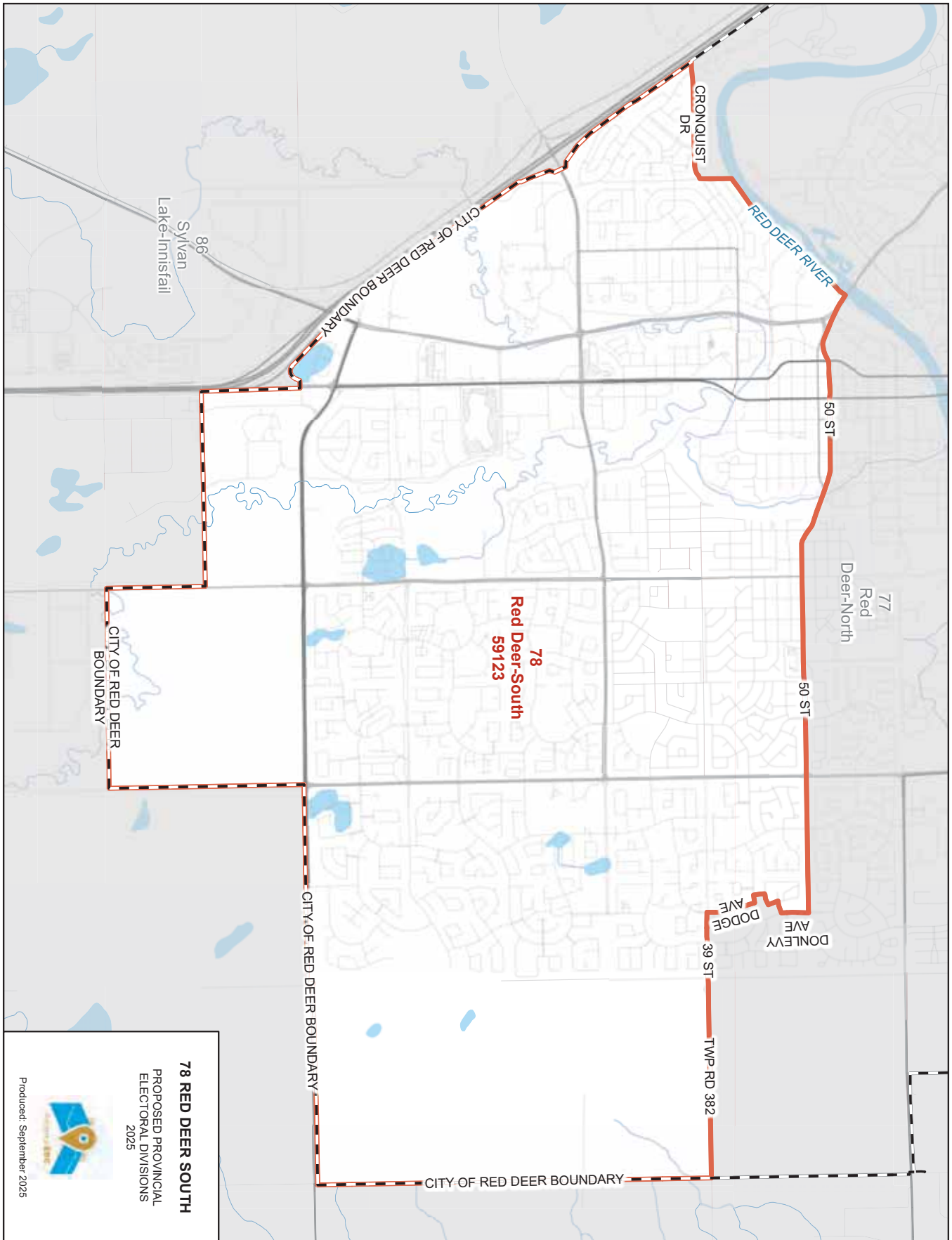












78 RED DEER SOUTH
 PROPOSED PROVINCIAL
 ELECTORAL DIVISIONS
 2025

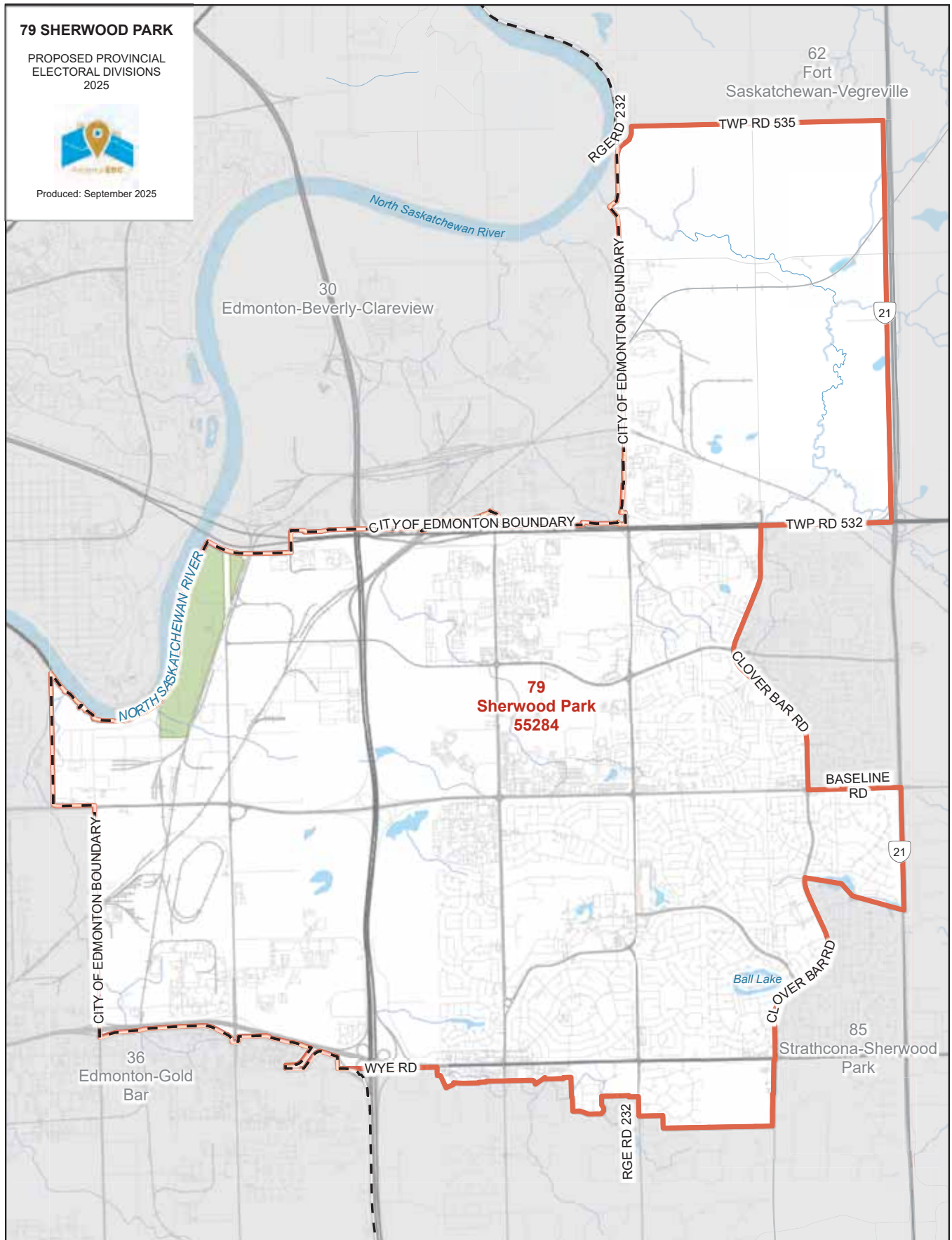
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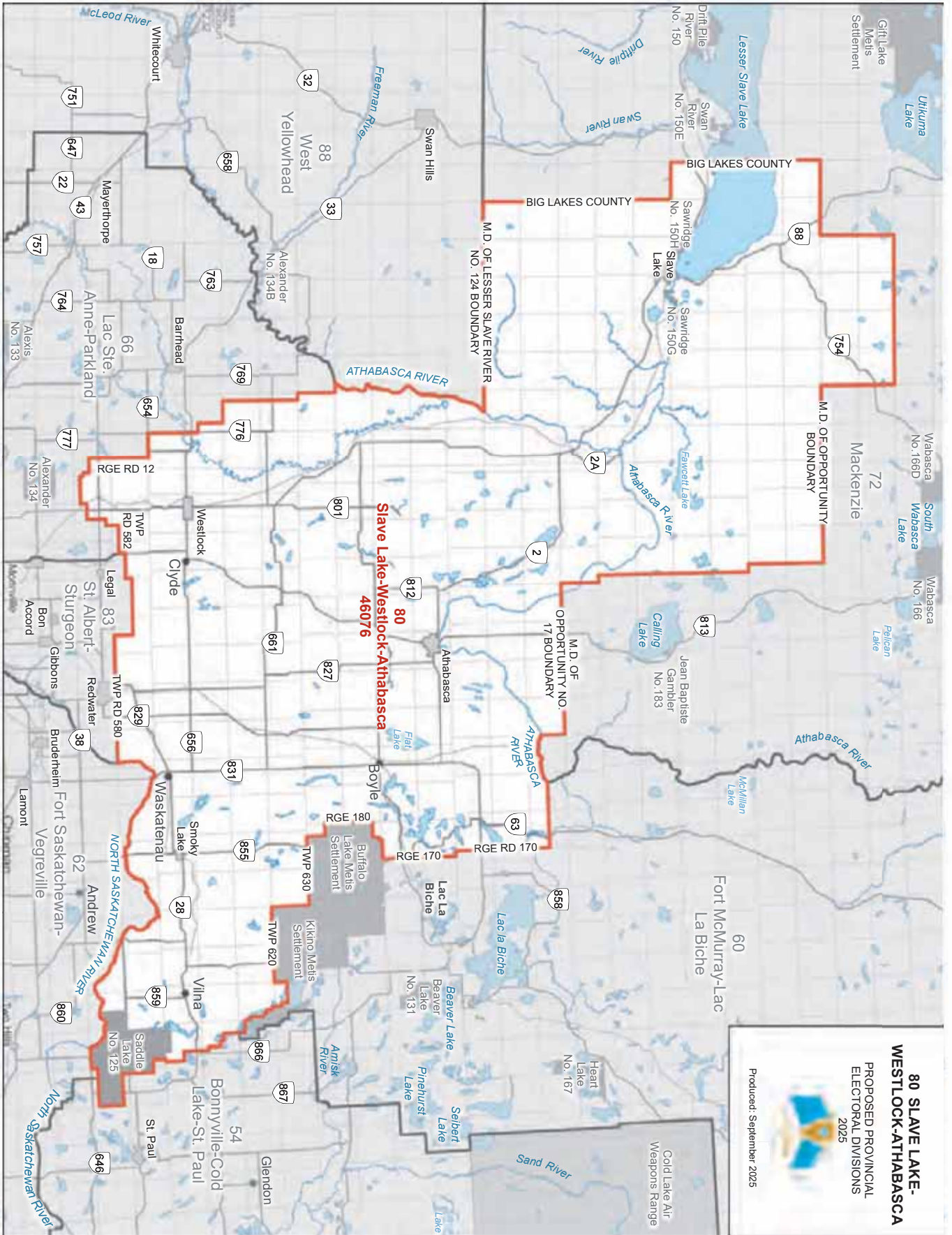
79 SHERWOOD PARK

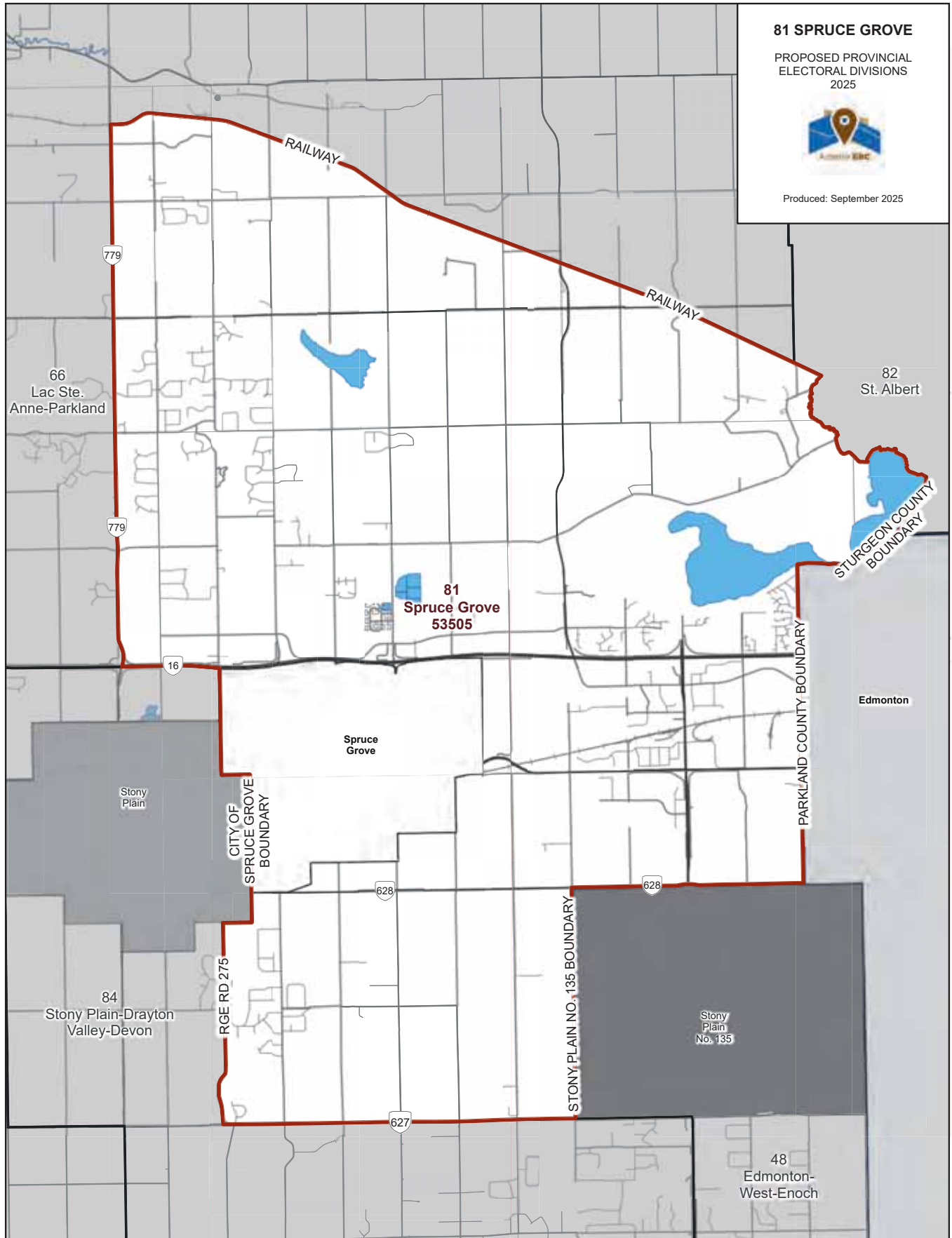
PROPOSED PROVINCIAL
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2025

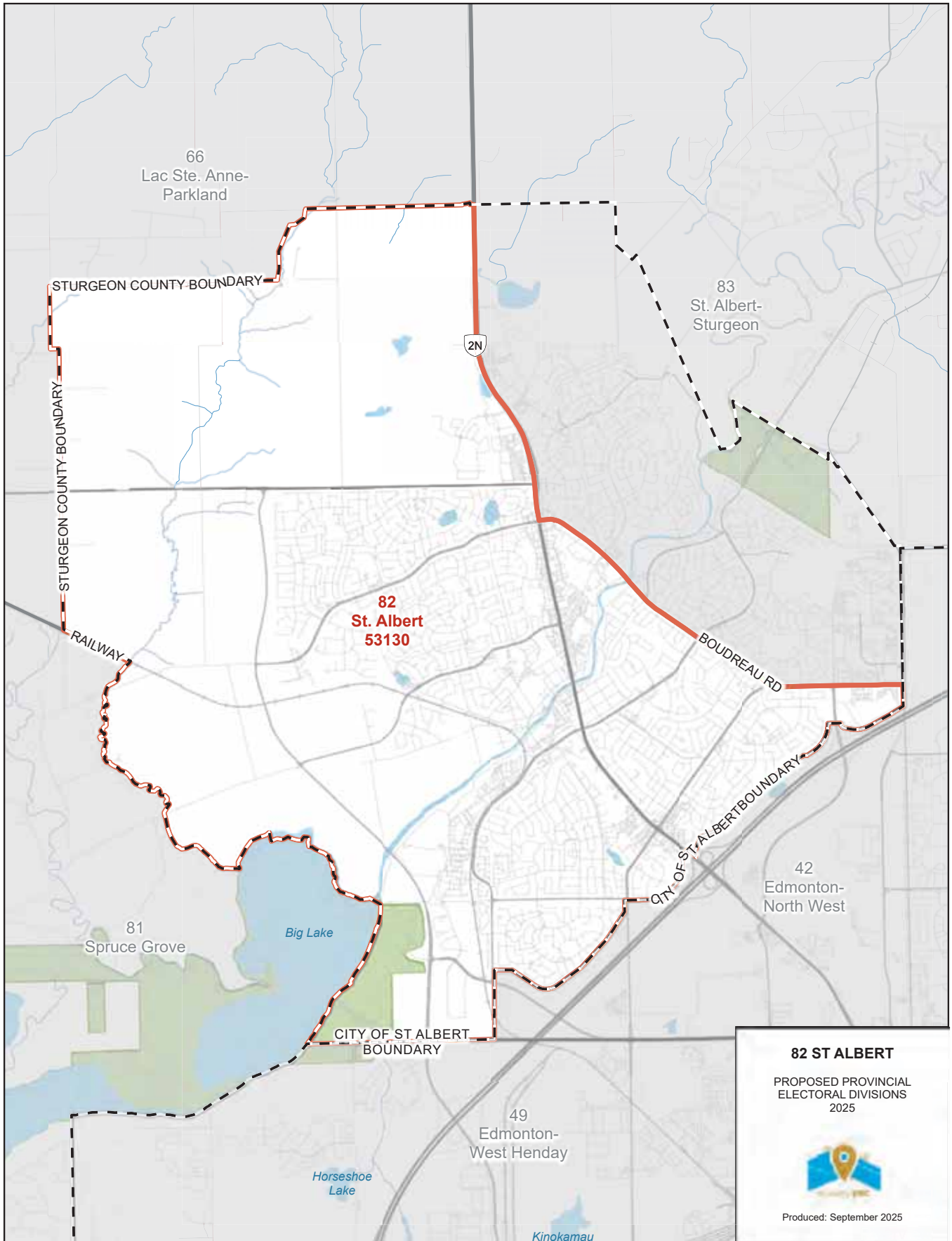


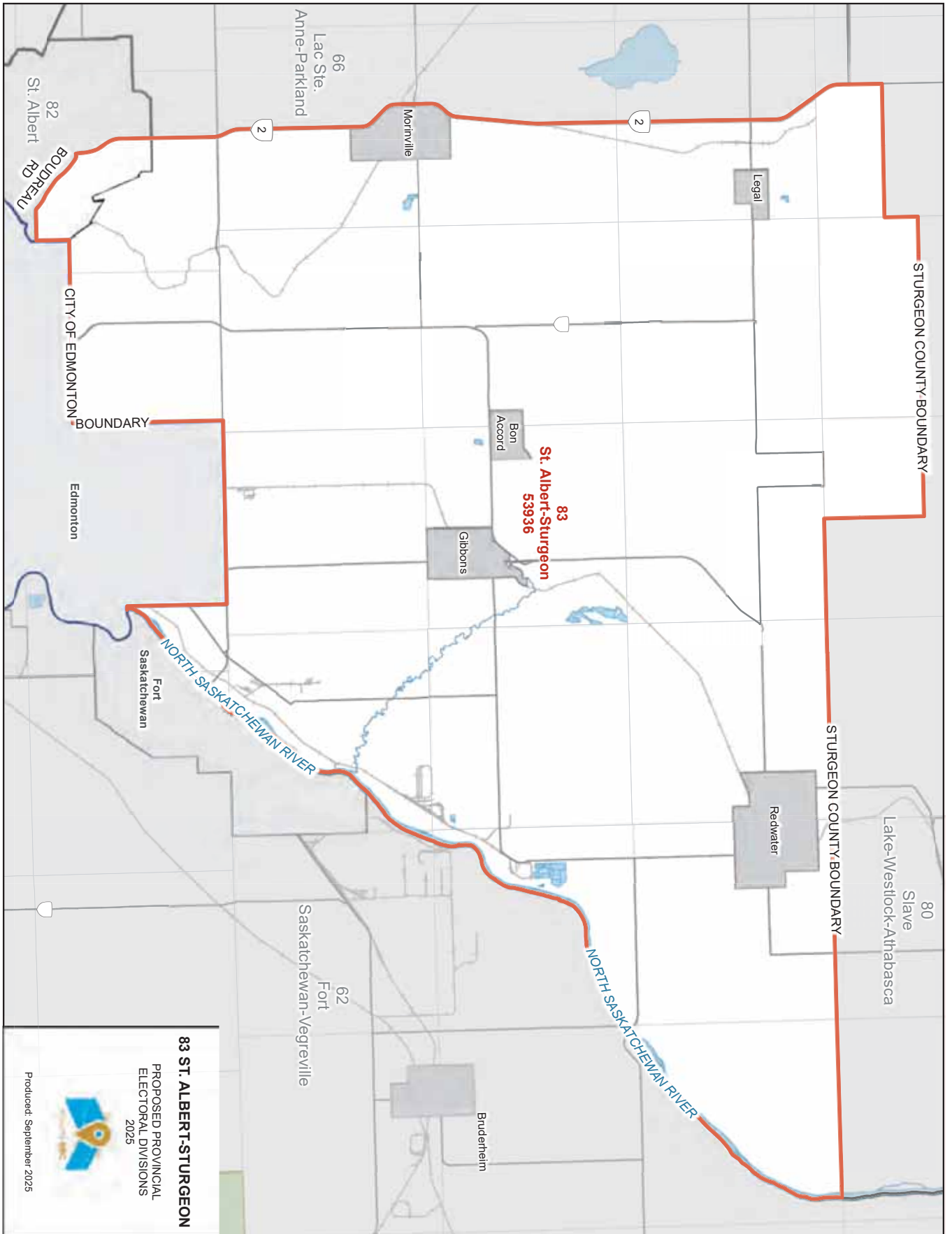
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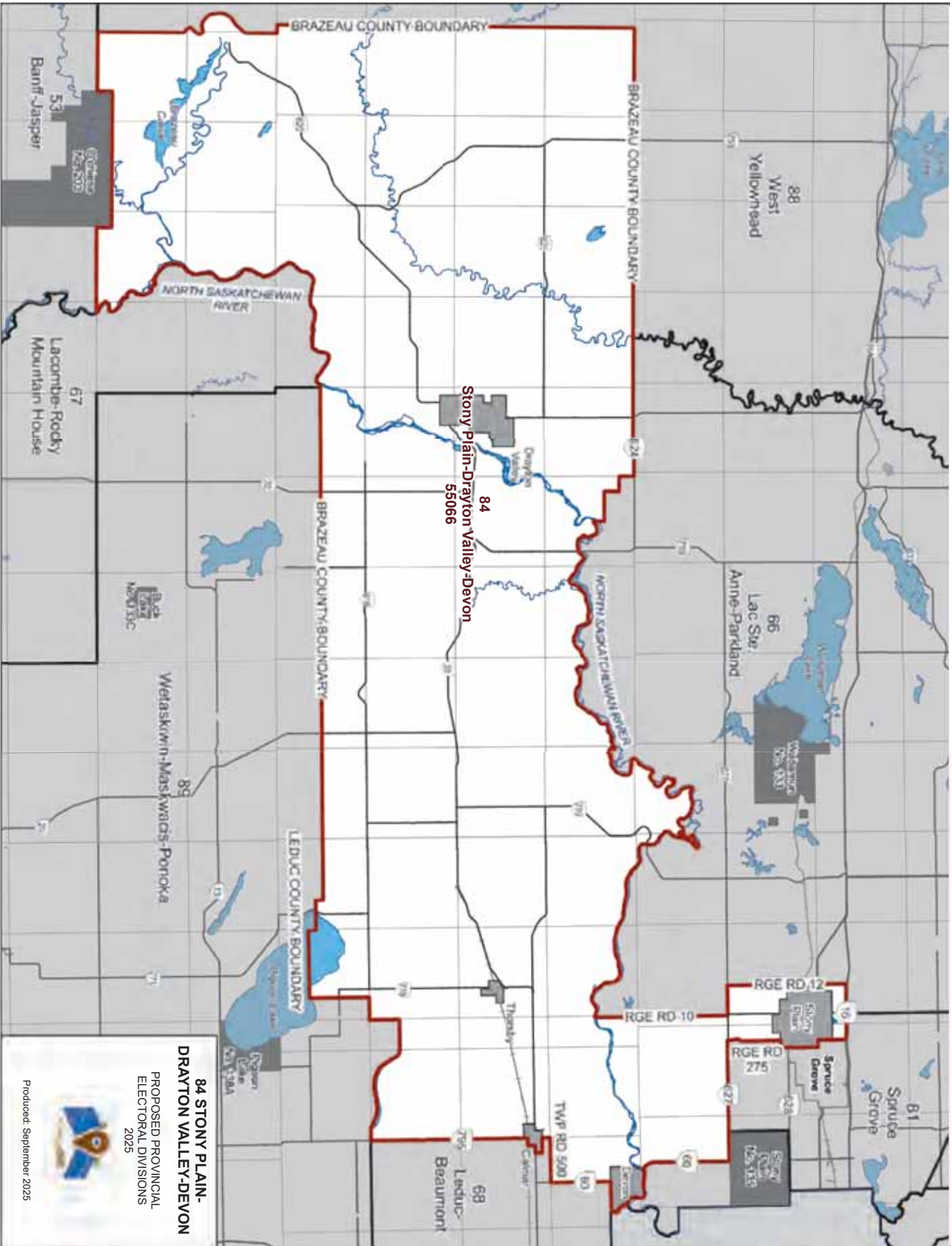


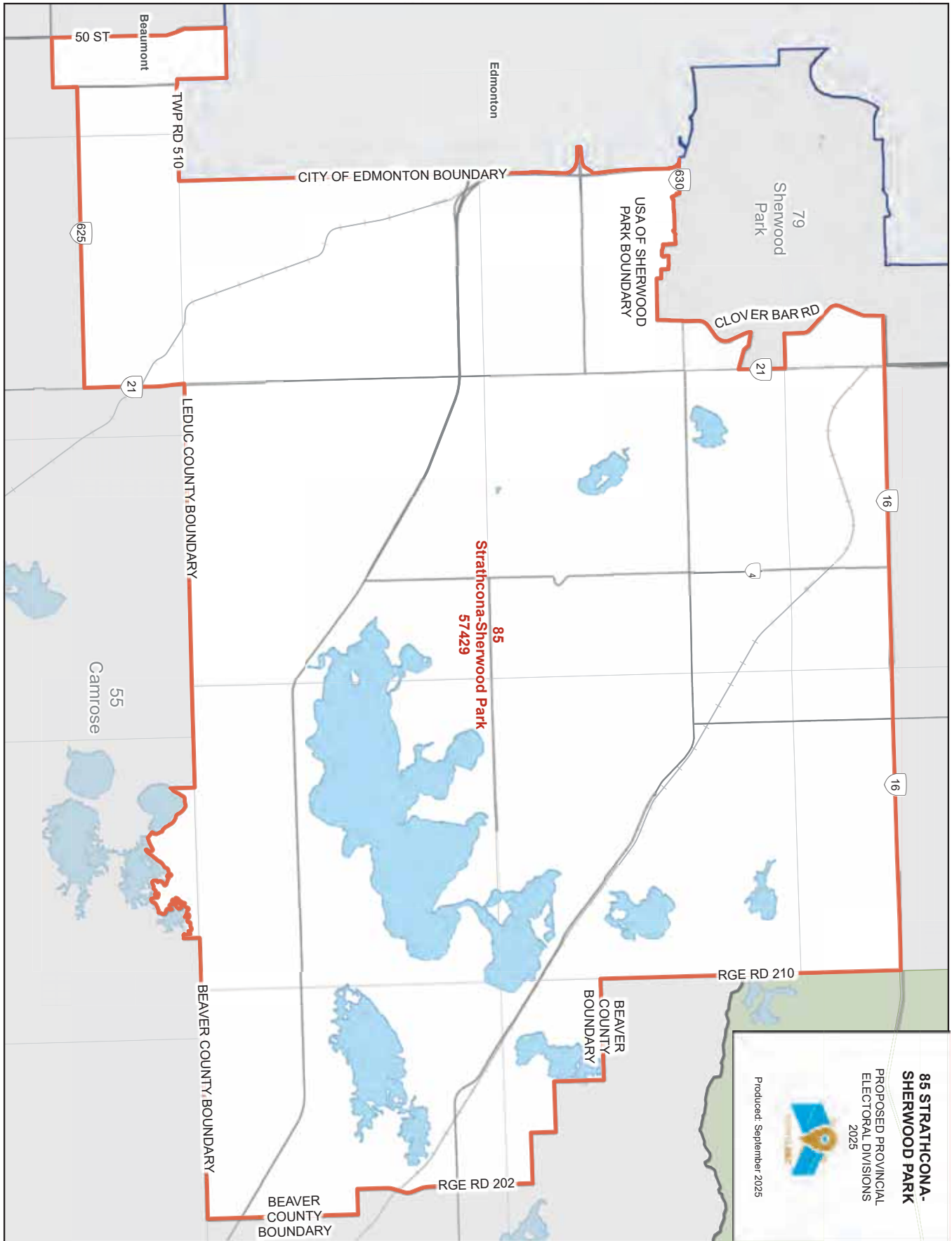


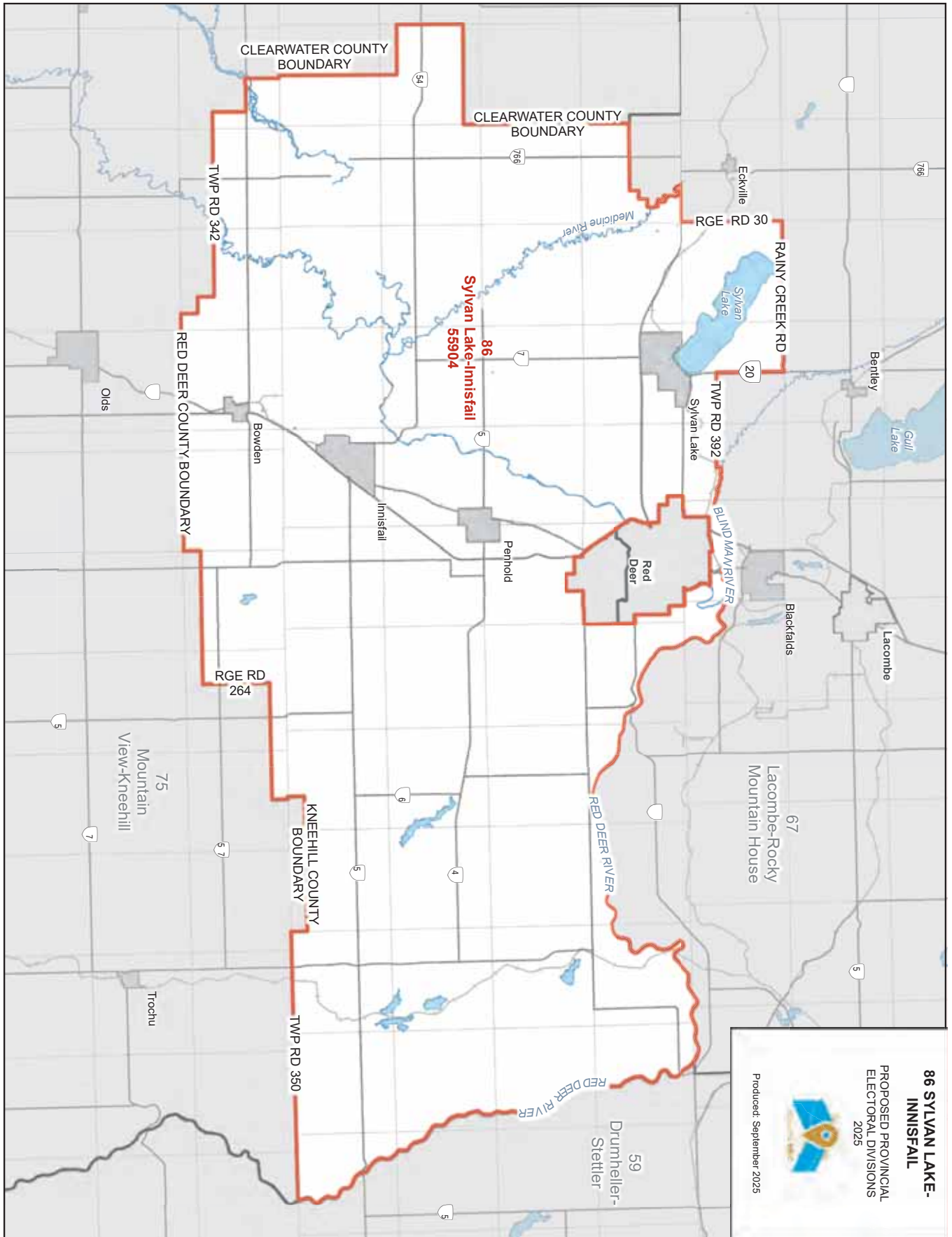










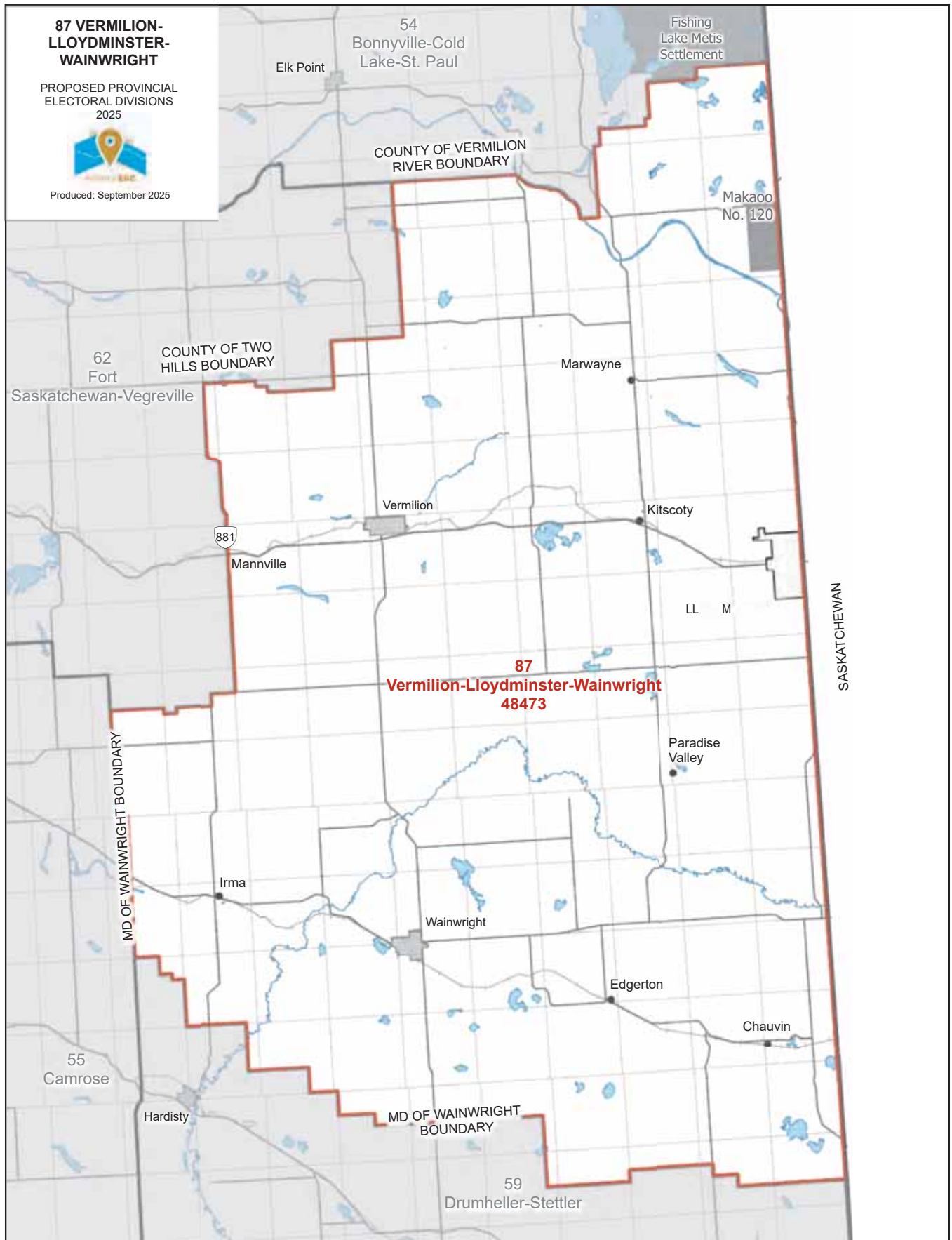


**87 VERMILION-
LLOYDMINSTER-
WAINWRIGHT**

PROPOSED PROVINCIAL
ELECTORAL DIVISIONS
2025

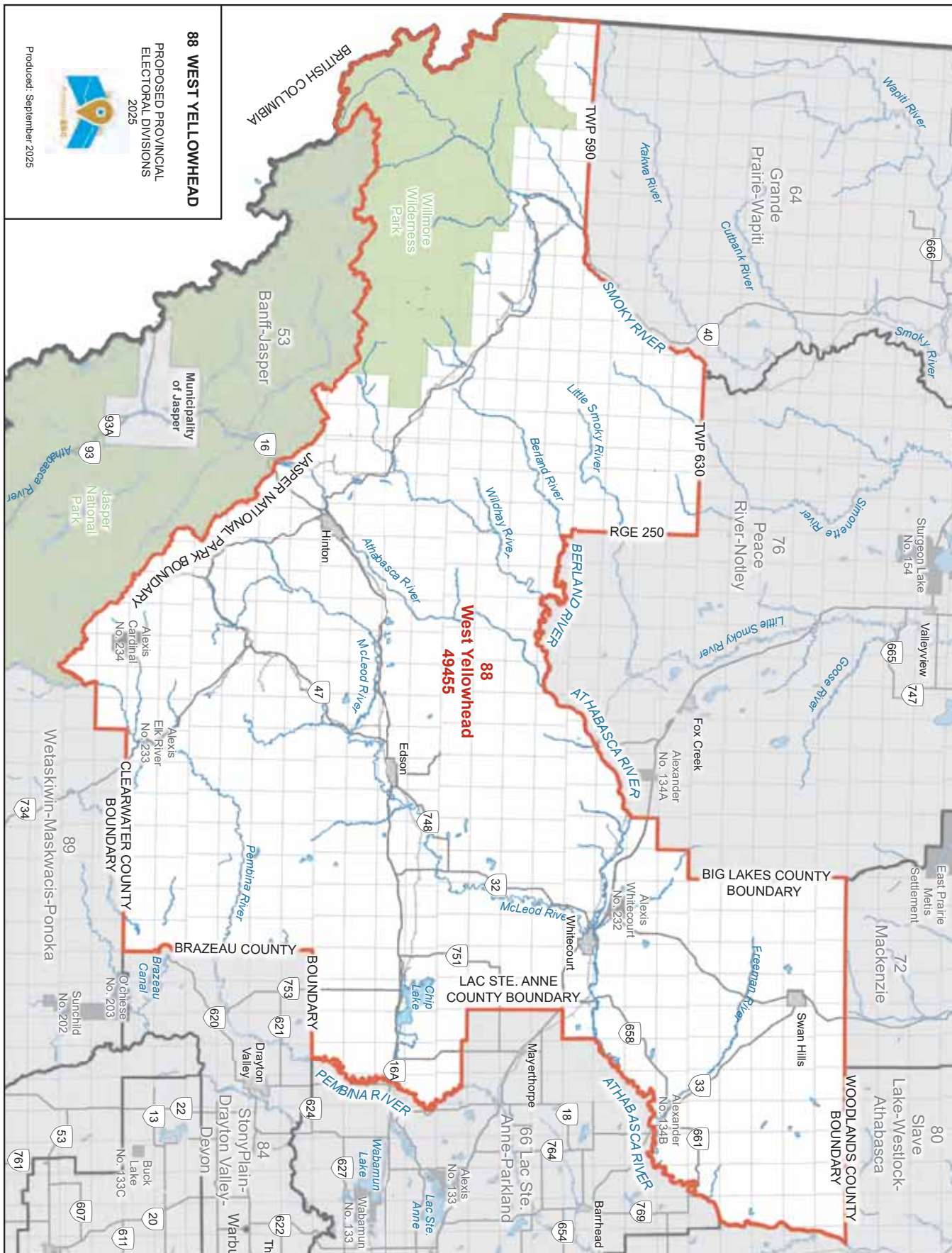


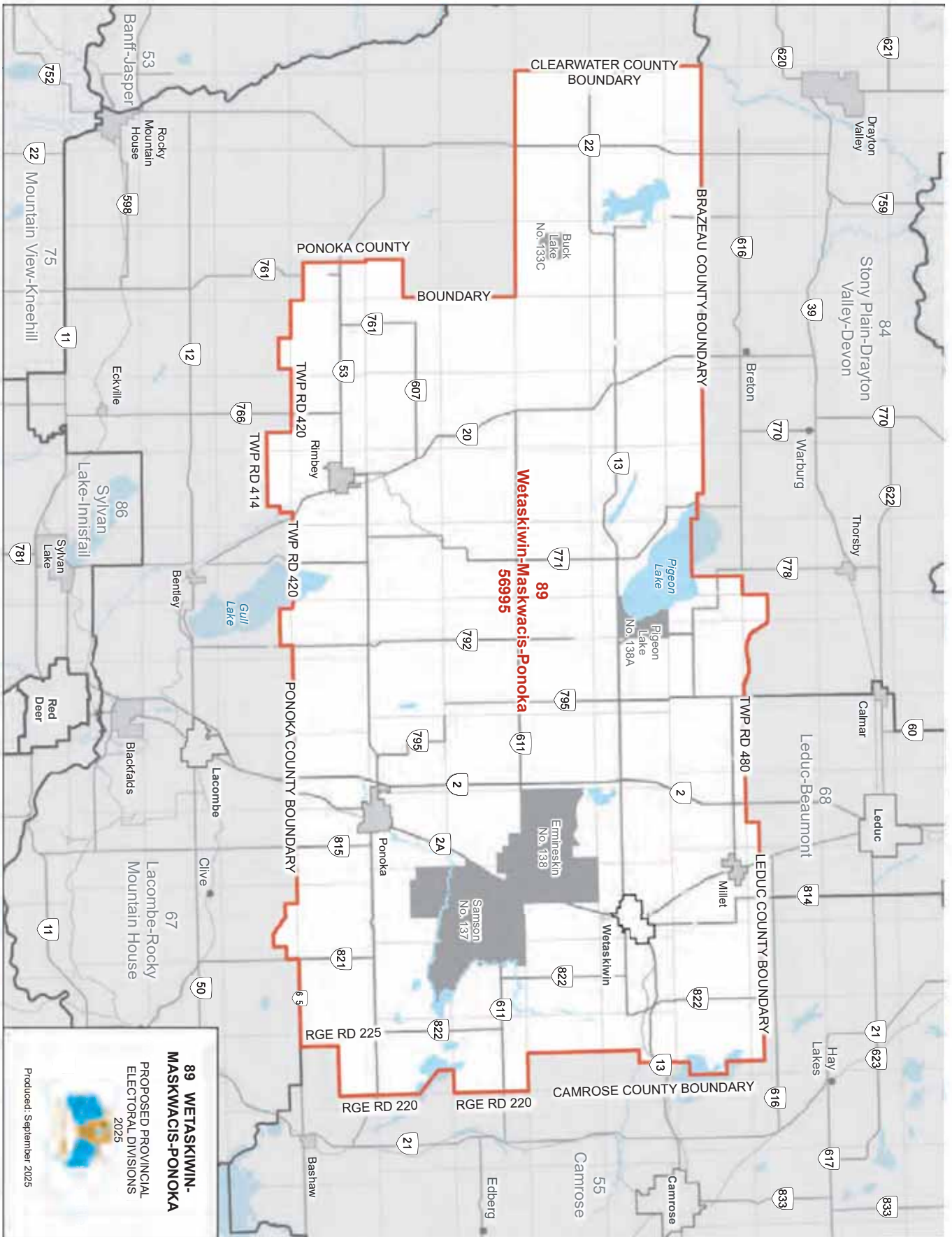
Produced: September 2025



88 WEST YELLOWHEAD

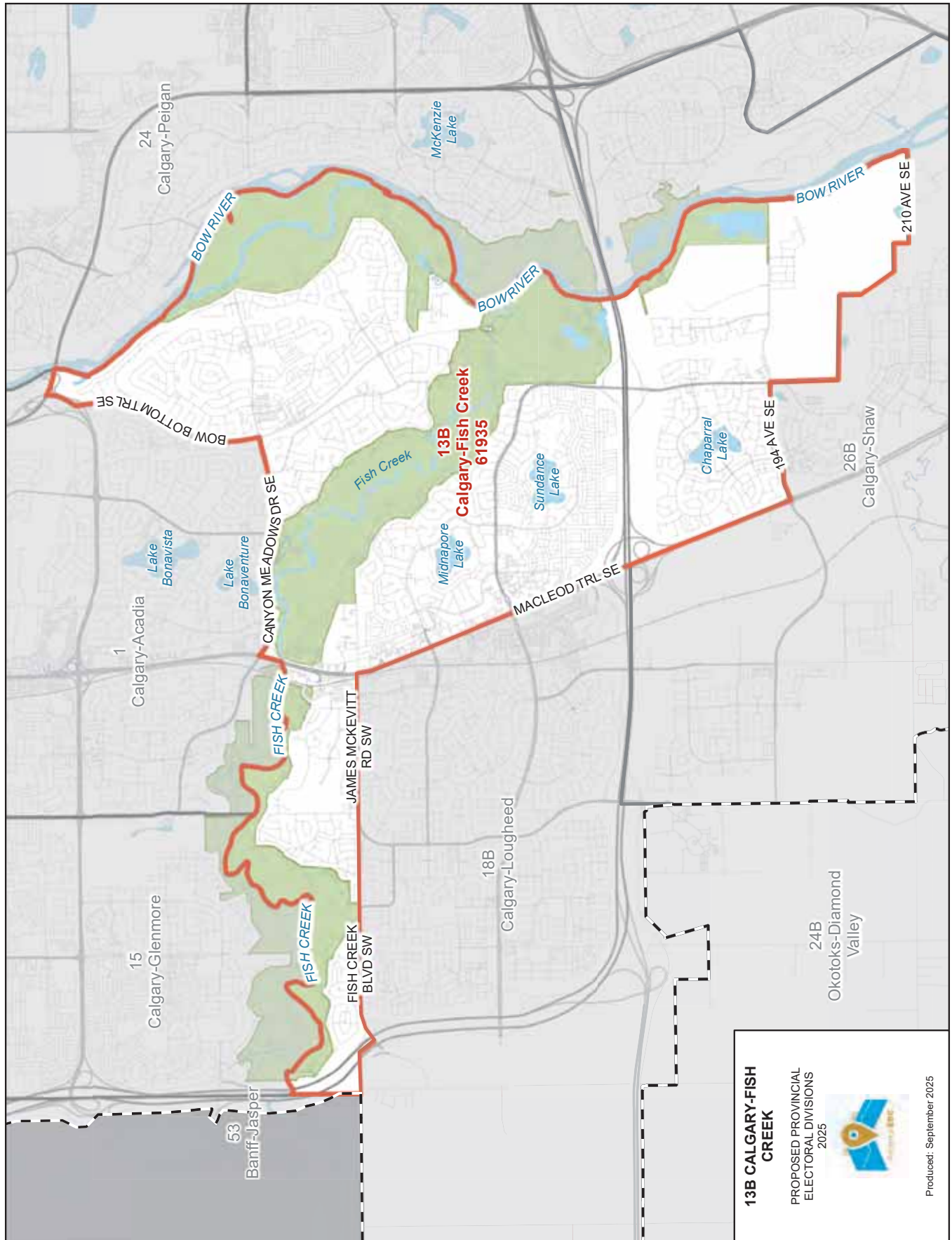
PROPOSED PROVINCIAL ELECTORAL DIVISIONS 2025

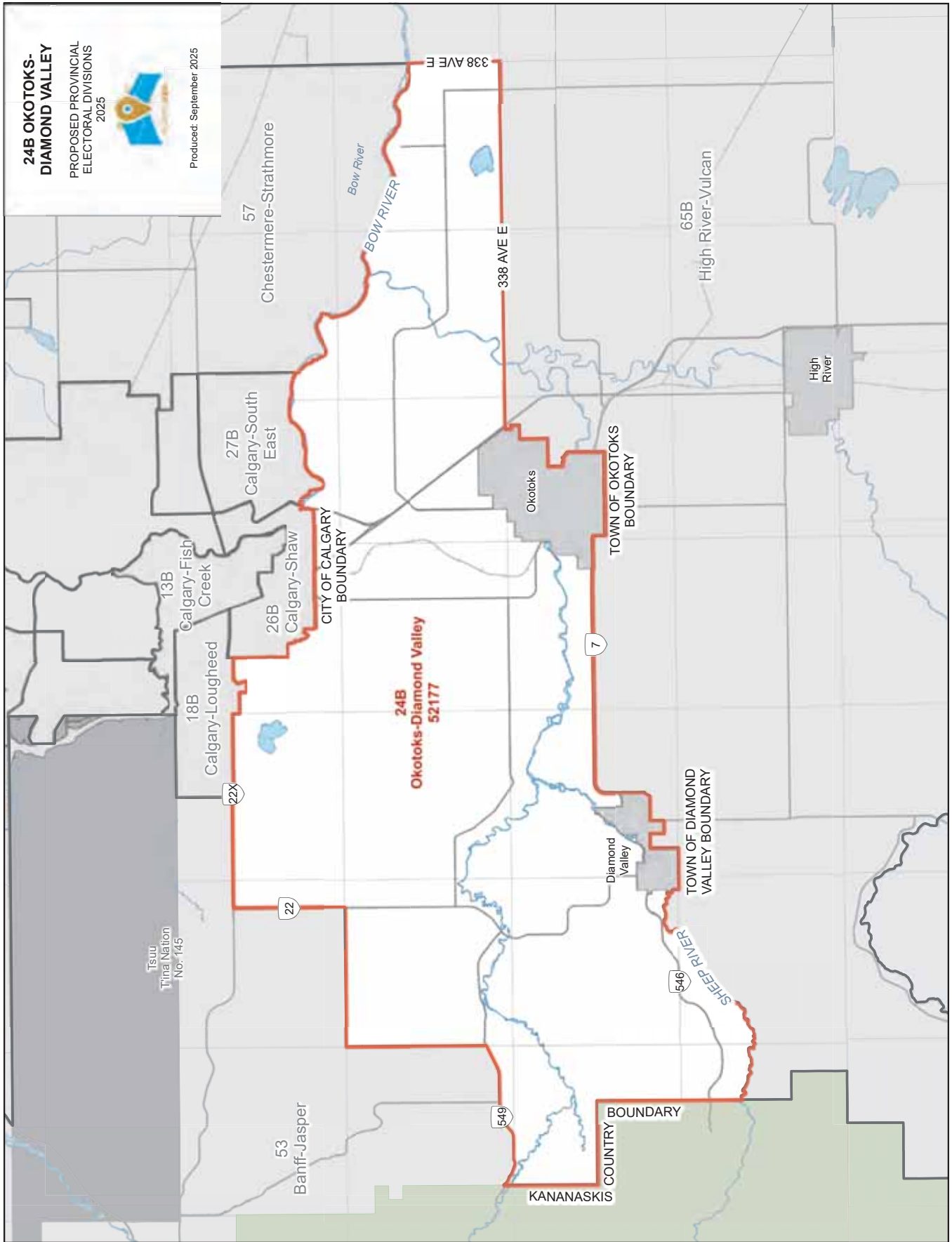


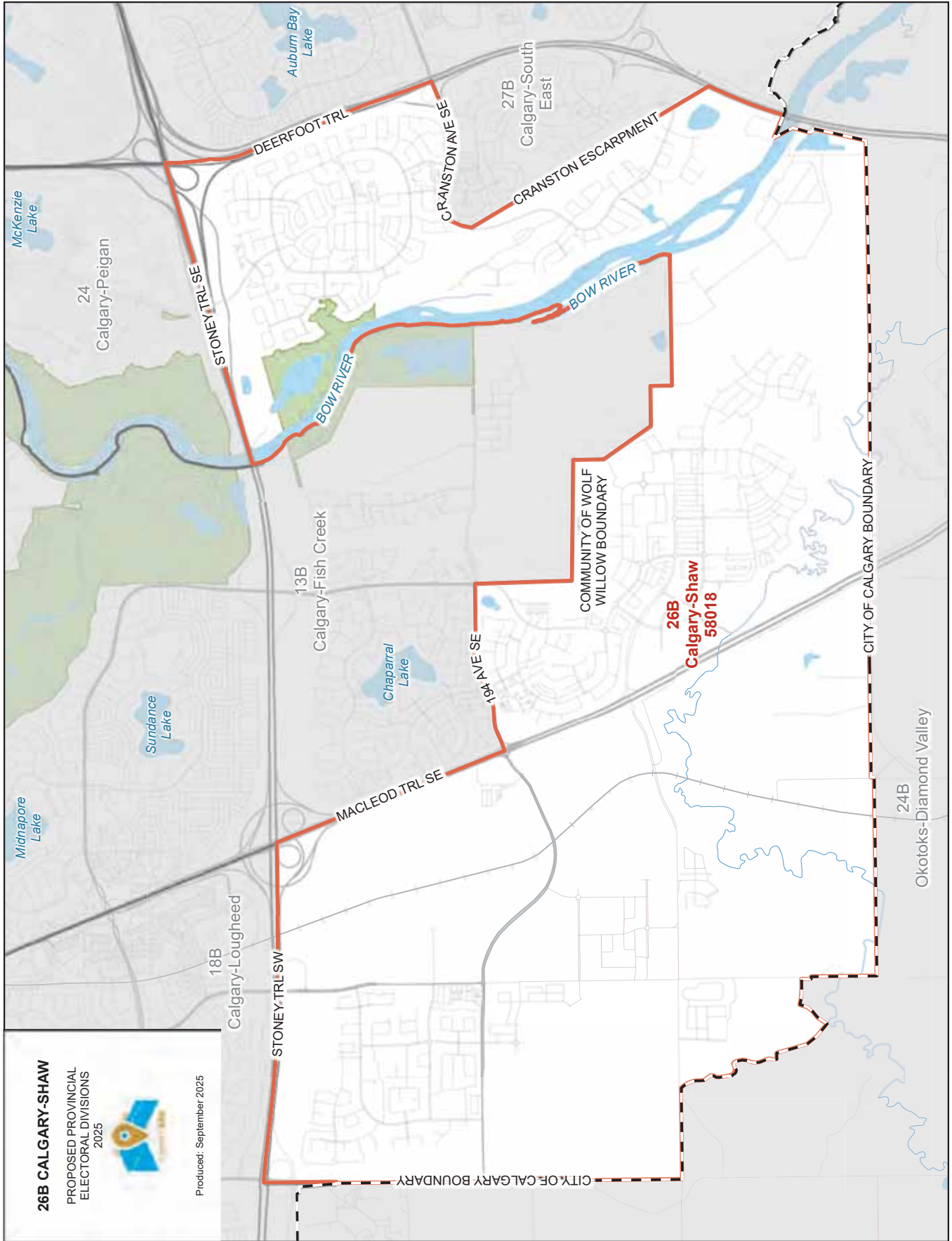


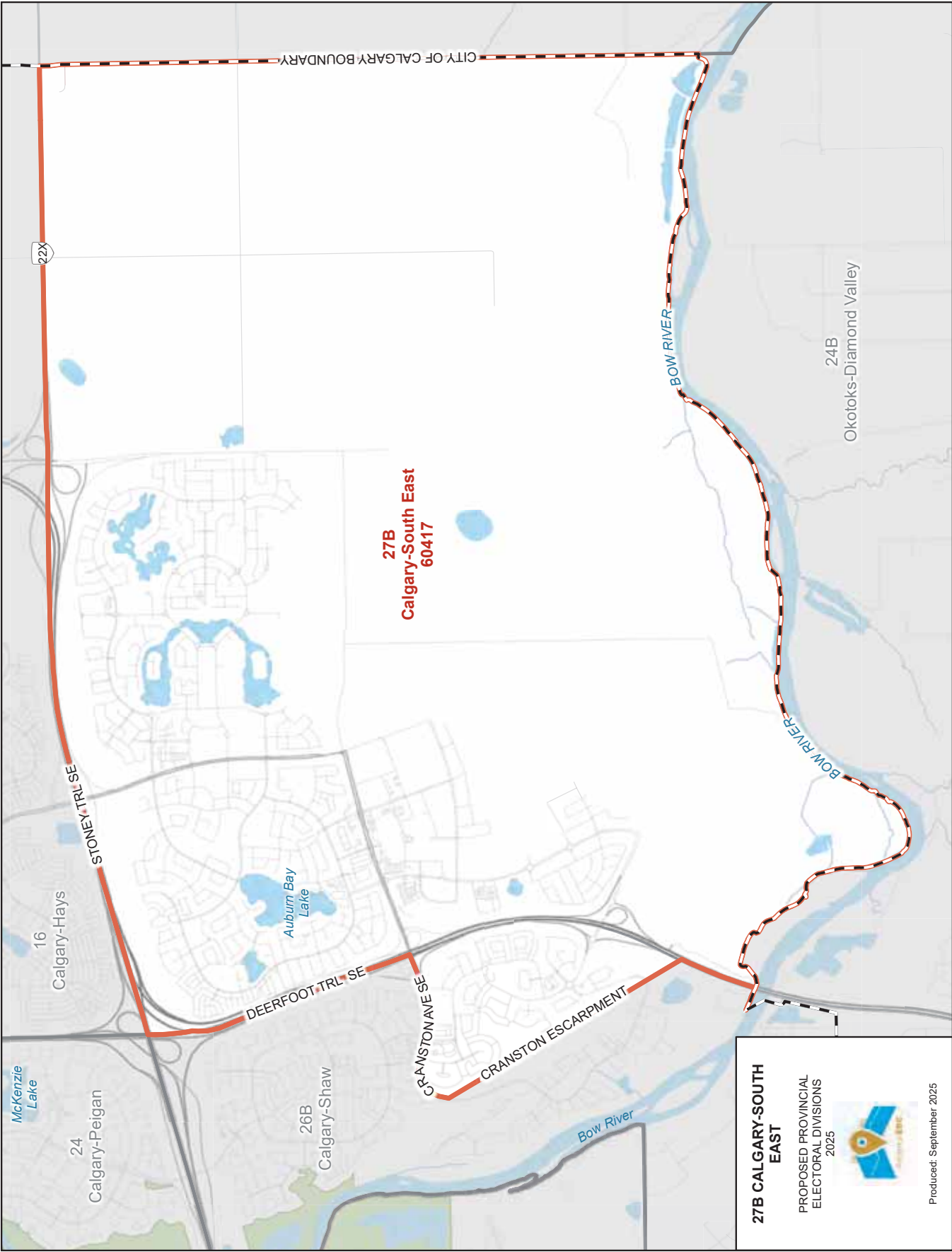
APPENDIX H:

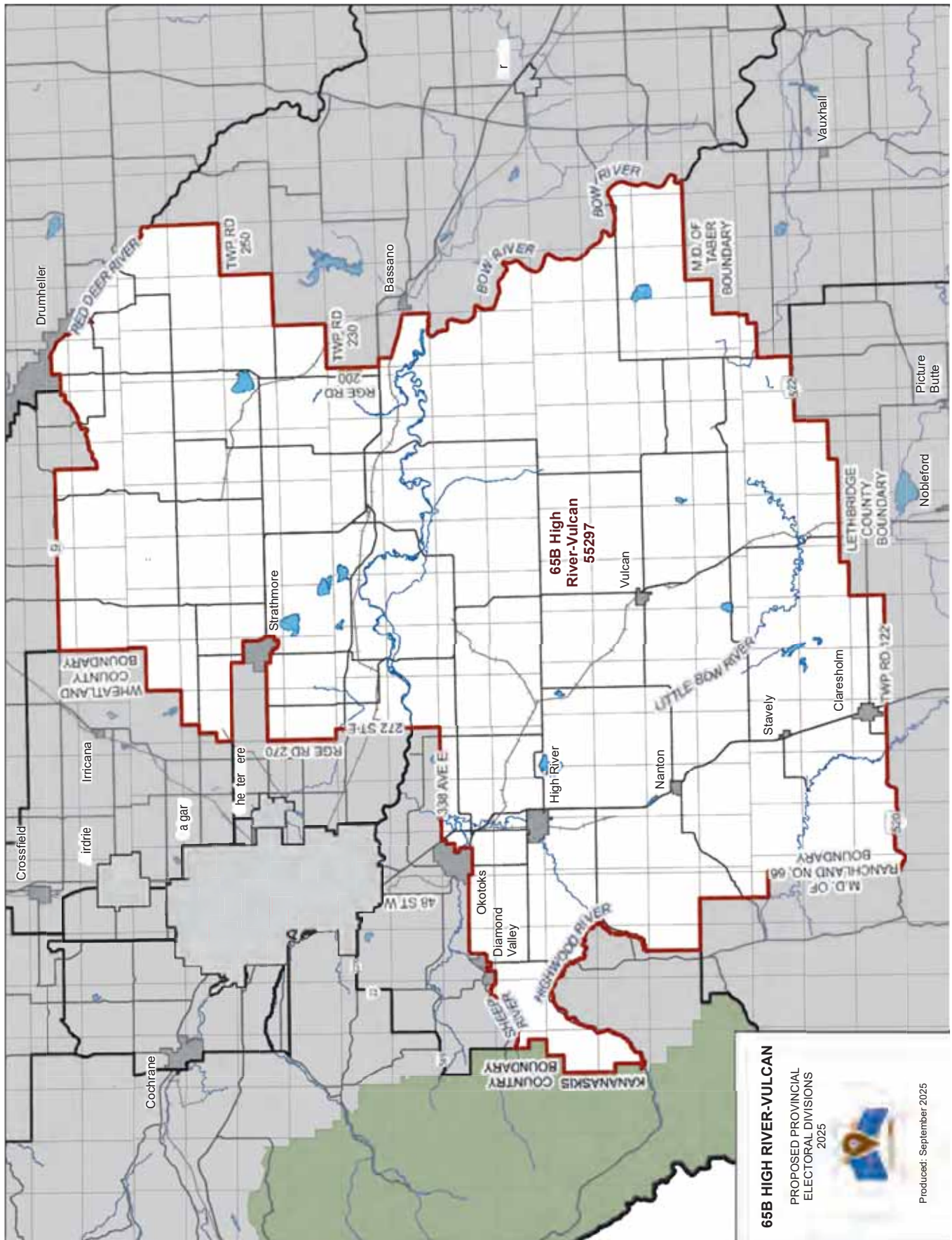
Seven Maps of Recommended Electoral Divisions











2025-26 Alberta Electoral Boundaries Commission



An independent body established
under Alberta legislation

ISBN: 978-1-988620-33-6