2026

Independent Advisory Panel on Electoral Boundaries

Report to the

Legislative Assembly of Alberta

October, 2026

Review of the Electoral Boundaries of Alberta
and Electoral Division Proposals

Dear Mr. Lunty and Members of the Select Special Committee on Electoral Boundaries:

Pursuant to Government Motion 37 approved by the Legislative Assembly of Alberta, attached hereto is the report of the independent advisory panel on electoral boundaries for your review.

It includes the advisory panel's proposals for the areas, boundaries and names of the 91 electoral divisions we were mandated to review.

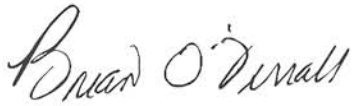
Also, incorporated in the advisory panel's proposals are the recommendations contained in Recommendation 5 in the Addendum to the Majority Report of the 2025-2026 Electoral Boundaries Commission subject to modifications the independent advisory panel considered necessary as permitted by Government Motion 37. Our proposals to restore the two electoral divisions the Commission proposed to be removed are contained in our report.

The Minority Opinion of two of the advisory panel's members is also included in our report.

With the submission of this report, we believe the advisory panel's mandate is concluded. If the Committee or the Legislative Assembly has questions arising out of any of our proposals, we are prepared to answer them.

Respectfully submitted this 22nd day of October, 2026.

The Honourable Brian O'Ferrall, Chair



The Honourable Monte Solberg, Panel Member



Darwin K. Durnie, Panel Member



Gerard Kennedy, Panel Member



Brent Robinson, Panel Member

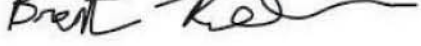


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1. Acknowledgements

The Independent Advisory Panel acknowledges those who have contributed over many decades to the development of Alberta's electoral map and, in particular, to the members of the 2025-2026 Alberta Electoral Boundaries Commission. Its commissioners did much of the heavy lifting in recommending the boundaries of most of the Province's electoral divisions. Electoral boundary mapping is an iterative process, and each boundary commission or review panel is assisted by its predecessors. Our panel, of course, was also assisted by the Legislature's decision to add two more electoral divisions which allowed us to restore the two electoral divisions the Commission recommended the Legislature remove.

The advisory panel was also assisted by the recommendations of the much-maligned Minority Commissioners. They gave the advisory panel much to consider in terms of whether effective representation involves a reconciliation of diverse interests or advocating for a specific community of interests.

Electoral boundary determinations are as important as they are difficult and complex; and the work of all who have participated in the process is to be valued, not to be deprecated.

2. Executive Summary

On June 9, 2026, the independent advisory panel (which will sometimes be referred to as the advisory panel or merely the panel) was appointed by the Select Special Committee of the Legislature on Electoral Boundaries pursuant to Government Motion 37 approved by the Legislative Assembly April 21, 2026.

The mandate of the independent advisory panel is dealt with in greater detail elsewhere in this report, but for the purposes of this executive summary the panel's mandate was to divide the Province into 91 geographic electoral divisions and then review and make proposals with respect to those electoral divisions. In addition, the panel was mandated to incorporate in its proposals certain recommendations made by the Chairman of the 2025-2026 Electoral Boundaries Commission.

I am pleased to report that we discharged our mandate as completely as could have been expected in the time the panel was given. I am also pleased to say that while not all members of the advisory panel agree with all the proposals or recommendations which are summarized below, all members cooperated and participated in the process.

That said, far too much of the panel's time and energy was expended dealing with mandate and constitutional issues raised by the minority members of the panel. I deal with those issues later in the report.

The advisory panel reviewed all of the Province's electoral divisions from several perspectives. We reviewed the current 87 electoral divisions. We reviewed the 89 electoral divisions proposed by the 2025-2026 Electoral Boundary Commission. And, in accordance with our mandate the advisory panel reviewed and recommended the restoration of the two electoral divisions the Commission had removed, but with slightly different names: Lac Ste. Anne and Rocky Mountain House-Sundre.

Restoring the Lac Ste. Anne electoral division compelled us in some cases and prompted us in other cases to make proposals for electoral divisions impacted or downstream of the restored Lac Ste. Anne electoral division. Those included Spruce Grove, Morinville-St. Albert (which we propose to rename Morinville-Sturgeon), Barrhead-Westlock-Athabasca, Fort McMurry-Lac La Biche, West Yellowhead and Drayton Valley-Devon. Maps and narratives describing these proposals are to be found in the pages that follow.

In restoring the Rocky Mountain House-Sundre electoral division, the advisory panel was also compelled or prompted to make proposals which would change Highway 2 corridor electoral divisions somewhat, including recommending changes to Maskwacis-Wetaskiwin, (which we propose to change to Wetaskiwin-Ponoka), Lacombe-Ponoka (which we propose to change to Lacombe-Sylvan Lake), Innisfail-Sylvan Lake (which we propose to change to Blackfalds-Innisfail), Olds-Didsbury-Three Hills (which we propose to extend to the southeast) and Drumheller-Stettler (which we propose to return to its pre-Commission boundaries).

Restoring the Rocky Mountain House electoral division also required the panel to consider changes to Banff-Kananaskis. In its stead, the panel proposes a new Banff-Canmore-Diamond Valley electoral division which, if approved, would obviate the necessity of making it a Section 15(2) special consideration electoral division.

The advisory panel is also recommending the restoration of a Leduc-Beaumont electoral division, an idea which the Chairman of the Electoral Boundaries Commission suggested might be studied. The panel studied it, liked it and is recommending it. However, in order for that recommendation to work, the panel is proposing the creation of an Edmonton-Nisku electoral division to replace the Edmonton-Beaumont electoral division which the Commission had proposed. The creation of an Edmonton-Nisku electoral division impacted Edmonton-South, which in turn required changes to Edmonton-Ellerslie and Edmonton-Meadows. In the process, the panel was able to recommend changes to Edmonton electoral divisions south of the North Saskatchewan River that our Edmonton panel member suggested were desirable and were part of the 2025-2026 Commission Chairman's Recommendation 5. Those recommended changes were to Edmonton-South, Edmonton-Windermere (formerly Edmonton-South West), Edmonton-Whitemud and Edmonton-Strathcona.

The advisory panel also reviewed the Calgary electoral divisions and recommends that the Legislature consider changes to Calgary-North West (to include adjacent Bearspaw communities), Calgary-Bow (to include North Springbank) and Calgary West (to include that portion of South Springbank that the Commission did not include when it extended the boundaries of Calgary West into Rocky View County to take in what the Commission called Elbow Valley). The Calgary electoral division proposals are not proposals that are supported by the entire panel but are supported by the majority.

The changes the advisory panel recommends for west Calgary, if approved, would precipitate changes to Banff-Kananaskis or Canmore-Banff as the Commission proposed it, and also to Cochrane-Springbank as the Commission mapped it. And so the panel has proposed changes to those two electoral divisions for the Legislature's consideration.

In Calgary, the advisory panel also reviewed and took a hard look at the northeast Calgary electoral divisions and came to the conclusion that short of substantial revisions to about a dozen electoral divisions in Calgary, there were no improvements to recommend which would quickly achieve better effective representation. However, the panel's analysis of these electoral divisions did suggest a review by the Legislature or by a future electoral boundaries commission to determine whether effective representation might be better achieved by a different configuration of electoral boundaries.

The advisory panel also reviewed the southern Alberta electoral divisions and has made proposals for a reconfiguration of the Lethbridge, Lethbridge-Little Bow, Lethbridge-Taber-Warner and Lethbridge-Cardston electoral divisions. The panel also proposes a reconfiguration of the current Livingstone-Macleod electoral division, which was made possible by the proposed mapping of the Lethbridge-Little Bow and the Lethbridge-Taber-Warner electoral divisions. Again, these proposals are not supported by all members of the advisory panel. However, the majority proposes that the Legislature give these suggested reconfigurations serious consideration.

Finally, as indicated above, the advisory panel examined the perennial problem of the Banff-Kananaskis or Banff-Canmore electoral division which has challenged prior electoral boundaries commissions. The panel has proposed an electoral division for the Legislature's consideration which attempts to address these challenges: Banff-Canmore-Diamond Valley. It is not a proposal which has the support of the entire panel, although it is supported by the majority.

Maps and detailed narratives explaining the advisory panel's proposals and the reasons for its proposal come later in this report.

With respect to all of the panel's proposals, we would urge the Legislature to assess them on their merits, not on which panelists supported or opposed them, or even how many panelists supported or opposed them. The test is whether they better achieve fair and effective representation.

With respect to the minority opinion of two members of the advisory panel, all I can say as Chairman is that I failed miserably to have this panel confine itself to the merits or otherwise of its electoral boundaries proposals, whether those proposals were those of the majority, the minority or even a single member of the panel. Instead, we had the same sanctimonious passing of judgment found in the majority's criticism of the minority in the 2025-2026 Electoral Boundaries Commission Report. Passing judgment on the constitutionality of this panel's process and proposals is for others to do. It certainly was not a part of the panel's mandate.

The minority's opinion can be summarized quite simply. Our proposals are constitutional; yours are not. Our proposals are non-partisan; yours are not.

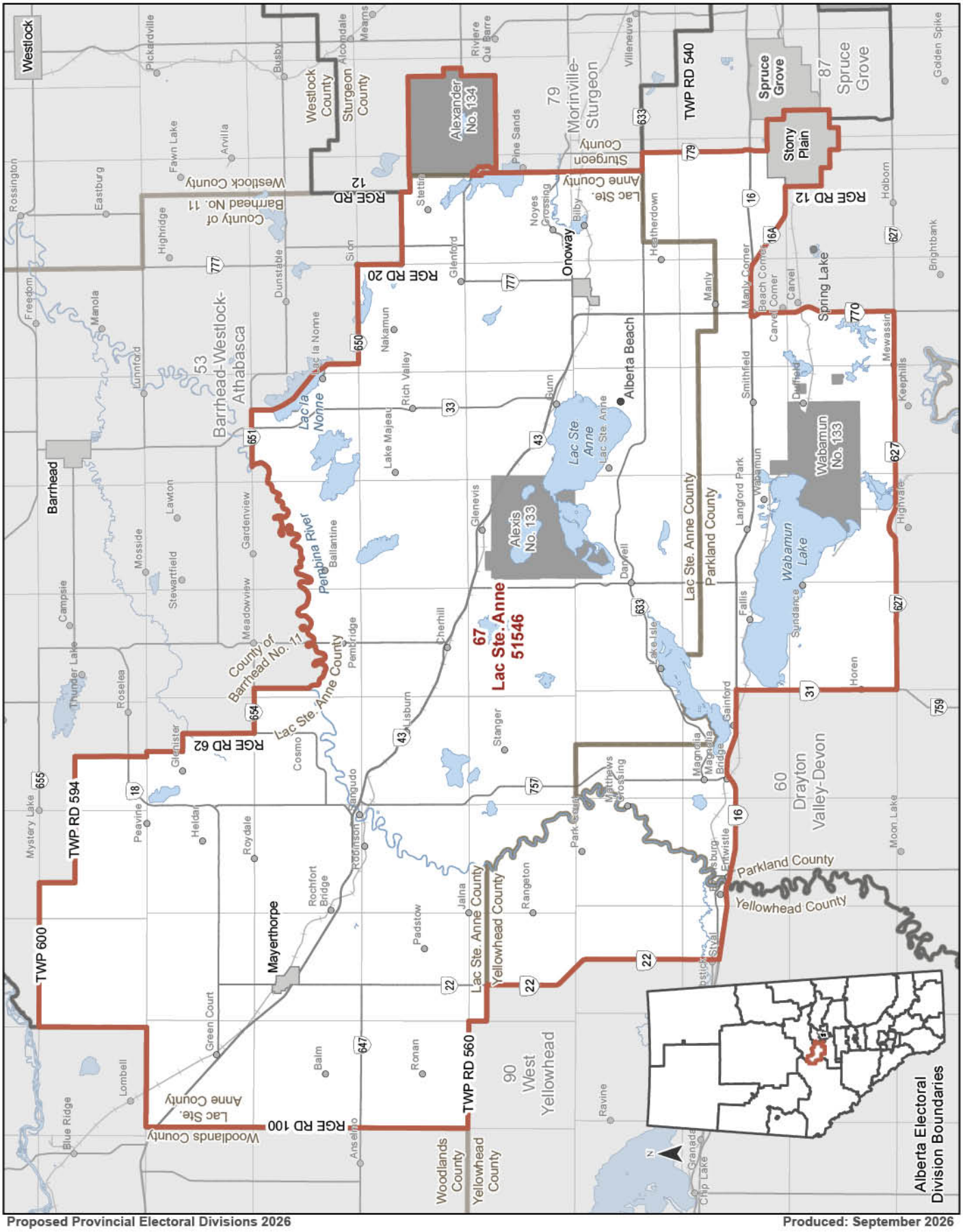
As a "lay" Chairman, I spent hours trying to understand the process of electoral boundary making. Having gained a modicum of understanding, I spent many more hours listening to both sides argue the merits or otherwise of their electoral boundary proposals. As a consequence, the only thing I can assure the Legislature is that the proposals made in this report are worthy of the Legislature's consideration on their merits.

Having read the law governing electoral boundary making, which in many ways is in its infancy in this country, my opinion is that the proposals contained in this report are not unconstitutional. They do not offend the *Charter*. They do not constitute a collateral attack on the 2025-2026 Electoral Boundaries Commission recommendations. The principle does not apply to non-binding recommendations. Nor do the panel's proposals violate administrative law principles of procedural fairness. The panel's proposals are not unprecedented and they do not exceed the panel's mandate. It is the minority's 40-page polemic passing judgment on the constitutionality of the panel's process and its proposals which exceeds the panel's mandate.

The panel's proposals deserve to be assessed only on the basis of their merits or otherwise, applying the Electoral Boundaries Commission Act and the principles the case law prescribes for recommending the boundaries of proposed electoral divisions.

Lac Ste. Anne

Estimated Population: 51,546



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

3. Electoral Division Proposals

Lac Ste. Anne

Lac Ste. Anne-Parkland, as the 2025-2026 Electoral Boundaries Commission named it in its Interim Report, was one of the two electoral divisions that the Chairman of the 2025-2026 Electoral Boundaries Commission recommended be "restored".

Lac Ste. Anne-Parkland, of course, is an existing electoral division under the Alberta Electoral Divisions Act. The 2025-2026 Electoral Boundaries Commission proposed its removal, but did so with regret.

The Alberta Legislature responded to that removal by urging the Government to introduce a Bill to amend the Electoral Boundaries Commission Act to divide the Province into 91 proposed electoral divisions instead of the current 89. The Electoral Divisions Act will require amending as well because, of course, it only provides for 87 electoral divisions. The addition of the two electoral divisions would permit the restoration of Lac Ste. Anne-Parkland.

In addition to urging the Government to increase the number of electoral divisions, the Legislature established a Select Special Committee of the Legislature to oversee a review of Alberta's electoral boundaries and directed the Committee to engage an advisory panel to incorporate, subject to modifications, the recommendations made by the Chairman of the 2025-2026 Electoral Boundaries Commission. Those recommendations were contained in the Chairman's Addendum to the Majority Report of the Commission.

In Recommendation 5, the Chairman of the Electoral Boundaries Commission recommended the restoration of the two electoral divisions which the Commission removed. Lac Ste. Anne-Parkland was one of them. The other was Rimbey-Rocky Mountain-Sundre.

The advisory panel has now reviewed the boundaries of the current (2017) Lac Ste. Anne-Parkland electoral division. In conducting that review, the panel also examined the Lac Ste. Anne-Parkland electoral division initially proposed by the 2025-2026 Electoral Boundaries Commission in its Interim Report. As a result of that review, the advisory panel is recommending that the current (2017) electoral division be roughly maintained in its prior configuration.

That said, the advisory panel is recommending several changes to the current Lac Ste. Anne-Parkland boundaries.

The first and most significant change the panel is recommending is the incorporation of Stony Plain into the Lac Ste. Anne electoral division. Stony Plain is immediately adjacent to the Lac Ste. Anne electoral division and so the incorporation is easily accomplished. Under the current electoral map, Stony Plain is in an electoral division known as Spruce Grove-Stony Plain.

The Lac Ste. Anne electoral division which the panel is recommending would run from Stony Plain to Onoway to Mayerthorpe along a Highway 43 alignment. Highway 43 is the main highway which runs northwest from Edmonton to Whitecourt, Fox Creek, Valleyview and Grande Prairie and is actually part of the CANAMEX trilateral trade and transportation route connecting Canada, the United States and Mexico.

The Lac Ste. Anne electoral division that the panel recommends, like the current Lac Ste. Anne-Parkland, would dip south of the Yellowhead Highway to take in Lake Wabamun and the Paul First Nation Reserve along the east shore of Lake Wabamun, putting it in an electoral division with the First Nations in Lac Ste. Anne, namely the Alexis Nakota Sioux Reserve at Lac Ste. Anne and the Alexander Cree Reserve northwest of Edmonton. This reunites the three Treaty 6 Reserves in the current (2017) Lac Ste. Anne-Parkland, that were divided by the Commission's recommendation.

With the exception of Alexander First Nation, however, we recommend that portions of Sturgeon County presently in Lac Ste. Anne-Parkland remain in Morinville-Sturgeon. The Commission recommended this

change as a consequence of removing Lac Ste. Anne-Parkland. The advisory panel would propose to keep that change in place notwithstanding the restoration of Lac Ste. Anne, to balance populations between Lac Ste. Anne and Morinville-Sturgeon, and to keep most of Sturgeon County united in a single electoral division.

Entwistle and Evansburg would continue to be in the same electoral division (Lac Ste. Anne) with the western boundary of the electoral division following Highway 22 north of the Yellowhead and then jogging west to take in Mayerthorpe.

As far as naming the Lac Ste. Anne electoral division is concerned, we would simply recommend "Lac Ste. Anne".

The restoration of the Lac Ste. Anne electoral division has, of course, impacted adjacent electoral divisions as mapped by the 2025-2026 Electoral Boundaries Commission. Some of the impacted electoral divisions can be restored to their current boundaries. Others need to be modified if Lac Ste. Anne is to be restored. And those changes, in turn, affect other electoral divisions remote from Lac Ste. Anne because of what are referred to as "cascading" effects. Changes to the boundaries of one electoral division or the insertion of a "new" electoral division in already mapped territory requires changes to the boundaries of electoral divisions elsewhere.

Electoral divisions, as mapped by the 2025-2026 Electoral Boundaries commission, that would have to be modified if the proposed restoration of Lac Ste. Anne is approved will be dealt with separately in this report, but they include:

1) To the north: Barrhead-Westlock-Athabasca;

2) To the east: Morinville-St. Albert (formerly St. Albert-Sturgeon);

3) To the west: West Yellowhead;

4) To the south: Spruce Grove-Stony Plain and Drayton Valley-Devon; and

5) As far away as Fort McMurray-Lac La Biche, adjustments had to be made.

In conclusion, the advisory panel proposes an electoral division called "Lac Ste. Anne" roughly consisting of:

1) The Town of Stony Plain;

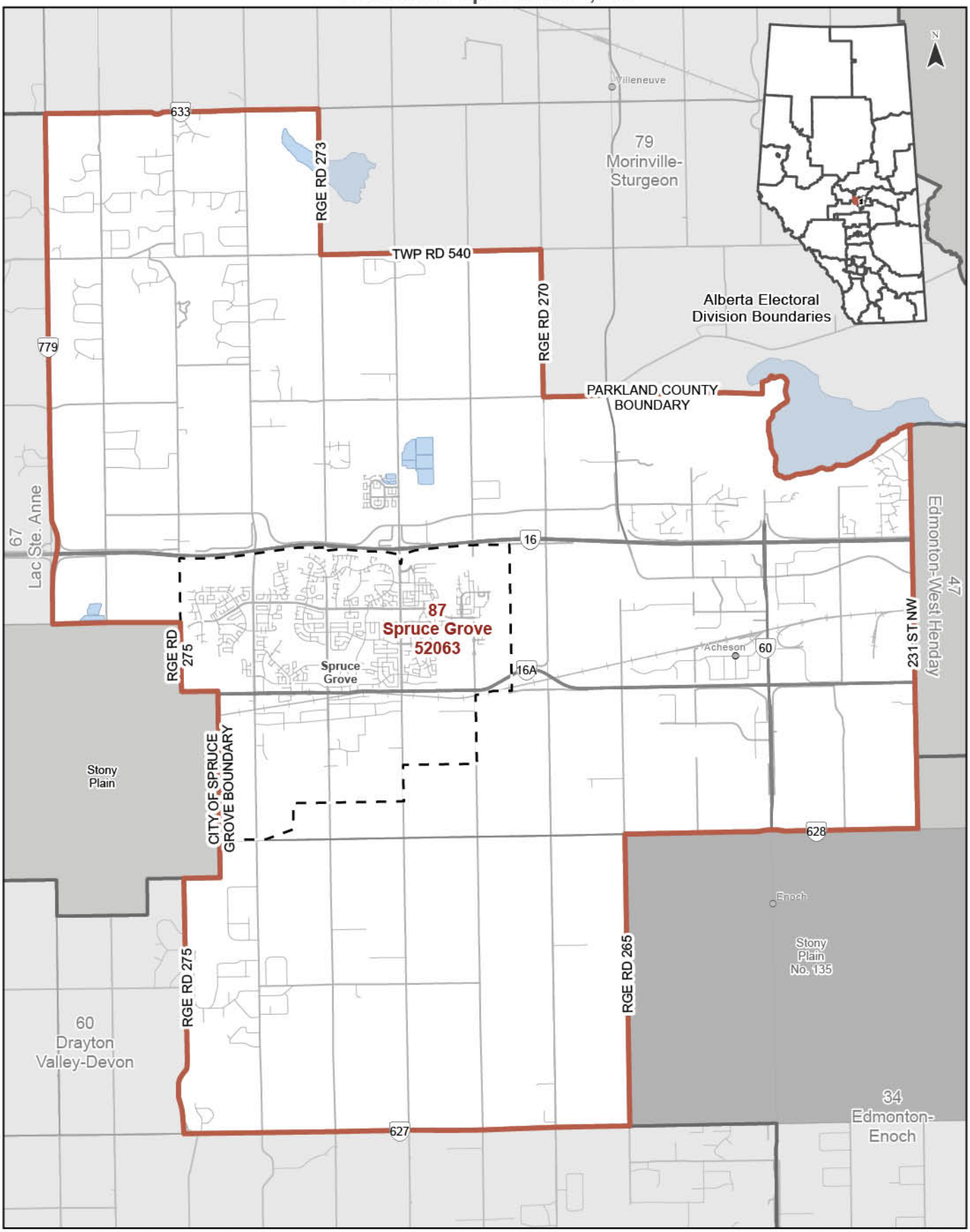
2) All of Lac Ste. Anne County;

3) Lake Wabamun

4) The most northerly portions of Parkland County as shown on the accompanying map.

This is a coherent electoral division west and north of Edmonton. There is a primary highway running through it, Highway 43, which connects its communities. The electoral division has a reasonable population. And the recommended boundaries of the electoral division appear to provide its constituents with the opportunity to obtain effective representation which the Legislature's resolution quite properly directed the panel to take into consideration.

Spruce Grove
Estimated Population: 52,063



Proposed Provincial Electoral Divisions 2026 **Produced: September 2026**

Spruce Grove

This is another electoral division impacted by the changes the advisory panel is recommending in connection with the restoration of the Lac Ste. Anne electoral division.

The current (2017) electoral division of Spruce Grove-Stony Plain contains both Spruce Grove and Stony Plain. If the advisory panel's recommendations are adopted, the electoral division will be comprised only of Spruce Grove and certain adjacent lands, not including Stony Plain.

The 2025-2026 Electoral Boundaries Commission recommended removing Stony Plain from Spruce Grove. The Commission recommended putting Stony Plain into an electoral division with Drayton Valley and proposed to call the electoral division Stony Plain-Drayton Valley.

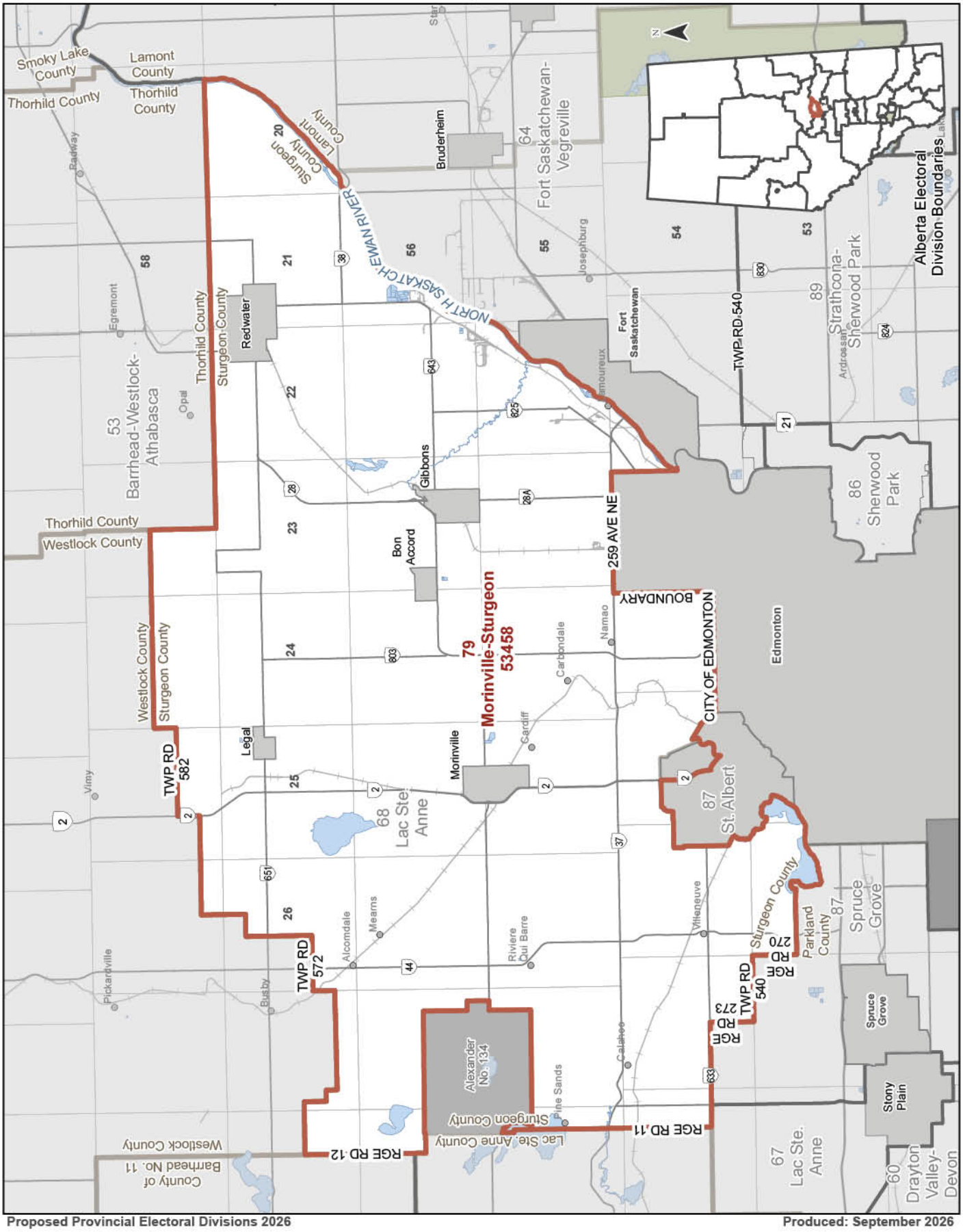
The Commission acknowledged that the connection between Stony Plain and Drayton Valley was not obvious; and clearly it is not. But connecting the two appears to have been driven by the elimination of the Lac Ste. Anne-Parkland electoral division.

What the advisory panel is now proposing is to put Stony Plain into the Lac Ste. Anne electoral division and restoring the current Drayton Valley-Devon electoral division in roughly its present configuration.

The impact of all of this is that the Spruce Grove electoral division will be comprised mostly of Spruce Grove. It will not include Stony Plain.

Spruce Grove and the areas immediately around it warrant an electoral division of their own. Spruce Grove is a city with a population of roughly 45,000 and is expected to grow. In the meantime, we have recommended extending the electoral division both north and south of Spruce Grove to give it the population it needs. In other words, to give Spruce Grove the population it needs for separate representation, we are including areas outside of Spruce Grove. Here is an example of where an area adjacent to an urban municipality assists it in getting more effective representation. In the south of the Province, the advisory panel recommends the converse, namely that an urban municipality (Lethbridge) share some of its population in order that adjacent rural populations obtain more effective representation.

Morinville-Sturgeon
Estimated Population: 53,458



Proposed Provincial Electoral Divisions 2026 **Produced: September 2026**

Morinville-Sturgeon

As a consequence of the recommended restoration of the Lac Ste. Anne electoral division, the advisory panel recommends that the current (2017) boundaries of the electoral division known as Morinville-St. Albert be substantially restored, except that eastern portions of the current (2017) Lac Ste. Anne-Parkland would be added to it. The panel would also recommend re-naming the electoral division Morinville-Sturgeon because it would be comprised of Morinville and all of Sturgeon County except for the Alexander First Nation Reserve. As St. Albert is already the name of an electoral division comprised of most, but not all, of St. Albert, the name may help avoiding confusion.

The 2025-2026 Electoral Boundaries Commission had reluctantly recommended increasing the size of the current (2017) Morinville-St. Albert electoral division which the Commission recommended renaming St. Albert-Sturgeon. Notwithstanding the restoration of the Lac Ste. Anne electoral division, the panel proposes to push the boundary of the Morinville-Sturgeon electoral division west to parallel Highway 779, except that the Alexander First Nation Reserve would remain in the Lac Ste. Anne electoral division, but Pine Sands on Sandy Lake would become part of Morinville-Sturgeon.

The Morinville-Sturgeon electoral division that the panel recommends has clear and understandable boundaries. Its southern boundary is the City of Edmonton and the southern border of Sturgeon County. Its eastern boundary is the North Saskatchewan River. Its western boundary is the western boundary of Sturgeon County. And the electoral division's northern boundary is roughly the northern boundary of Sturgeon County.

The electoral division includes the airbase at Namao, the northeast quadrant of the City of St. Albert and the Town of Morinville, further north along Highway 2. It also includes Legal, Bon Accord, Gibbons, and Red Water.

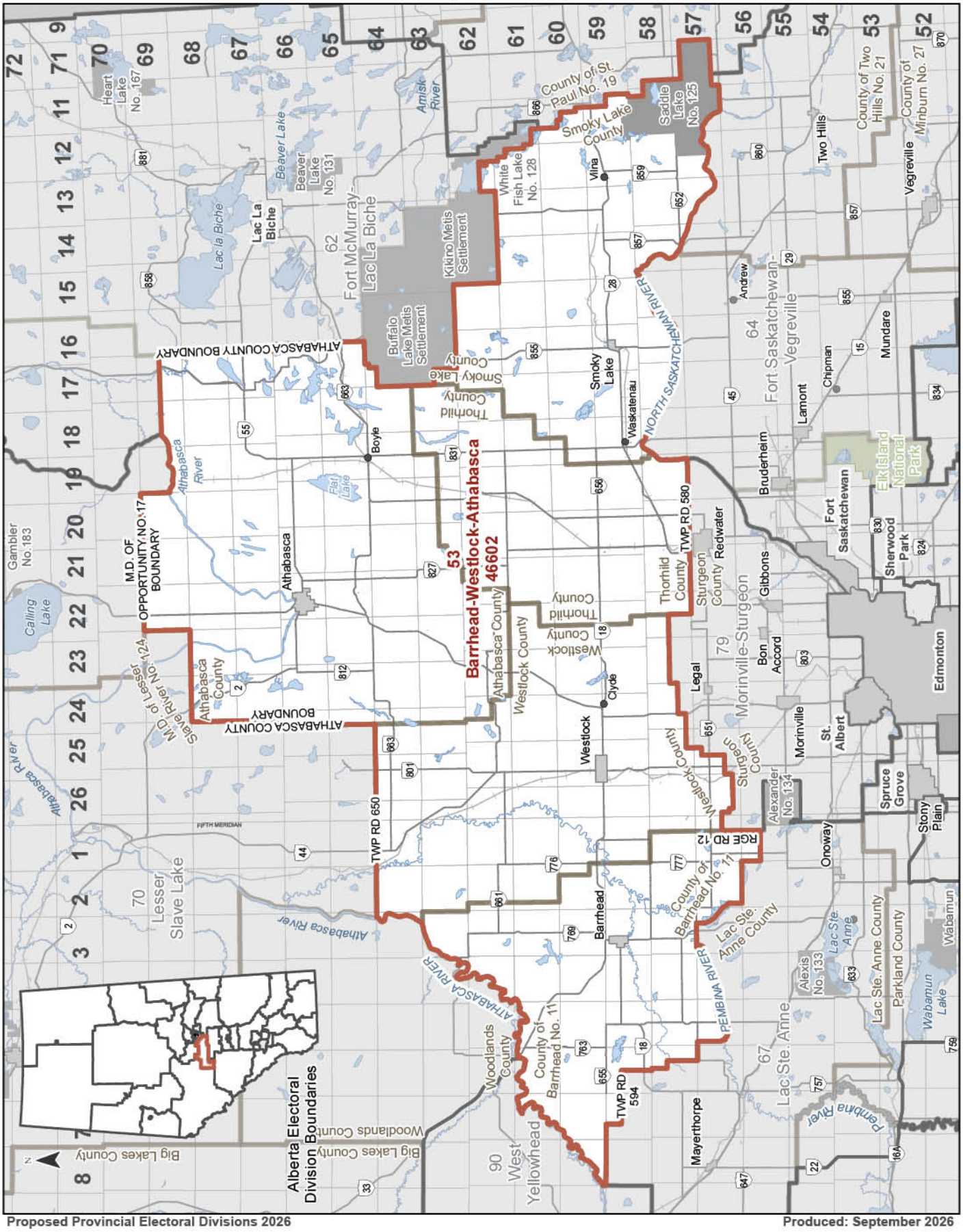
In the panel's view, it might be preferable to call this electoral division Morinville-Sturgeon (as opposed to St. Albert-Sturgeon) because it takes in the entire town of Morinville, and only a part of St. Albert. It also avoids the confusion of having St. Albert in the name of two electoral divisions. The electoral division is also comprised of most of Sturgeon County. Sturgeon County administers the western half of the electoral division.

The 2025-2026 Electoral Boundaries Commission recommended that the border between the St. Albert electoral division and what we are now calling the Morinville-Sturgeon electoral division be moved within the City of St. Albert such that all areas south of the Sturgeon River in St. Albert would be mapped in the City of St. Albert electoral division. We concur in that recommendation

The relatively low population of Morinville-Sturgeon at 47,131 or 12% below average may soon be ameliorated. There is extraordinary growth in Sturgeon County's east end which should only increase with Meta's $13-billion artificial intelligence data centre proposed to be built in Sturgeon Country within Alberta's Industrial Heartland near Fort Saskatchewan.

Barrhead-Westlock-Athabasca

Estimated Population: 46,602



Proposed Provincial Electoral Divisions 2026 **Produced: September 2026**

Barrhead-Westlock-Athabasca

This electoral division, as mapped by the 2025-2026 Electoral Boundaries Commission, was one of the electoral divisions impacted by the elimination of the Lac Ste. Anne -Parkland electoral division. However, now, with the restoration of the Lac Ste. Anne electoral division, we are proposing boundaries for Barrhead-Westlock-Athabasca which are roughly the same as the current Athabasca-Barrhead-Westlock electoral division boundaries. The *status quo* is maintained and in the absence of a pressing need to make changes, maintaining the *status quo* is considered good practice in electoral boundary mapping. Studies have found that maintaining the *status quo* in clear and understandable electoral divisions promotes collective recognition of community concerns over time. It has also been found to promote recognition of elected representatives by constituents who all too often do not know who their elected representative is.

When Lac Ste. Anne-Parkland was recommended for removal, portions of it, including Lac Ste. Anne itself, was put into Barrhead-Westlock-Athabasca. But when the Legislature indicated a desire to have the Lac Ste. Anne-Parkland electoral division restored, the advisory panel found that it could be restored, but the restoration removed a significant portion of Barrhead-Westlock-Athabasca as mapped in the 2026-2026 Electoral Boundaries Commission's Final Report. And so, the advisory panel is proposing an electoral division which is similar to the current (2017) Athabasca-Barrhead-Westlock electoral division with two changes.

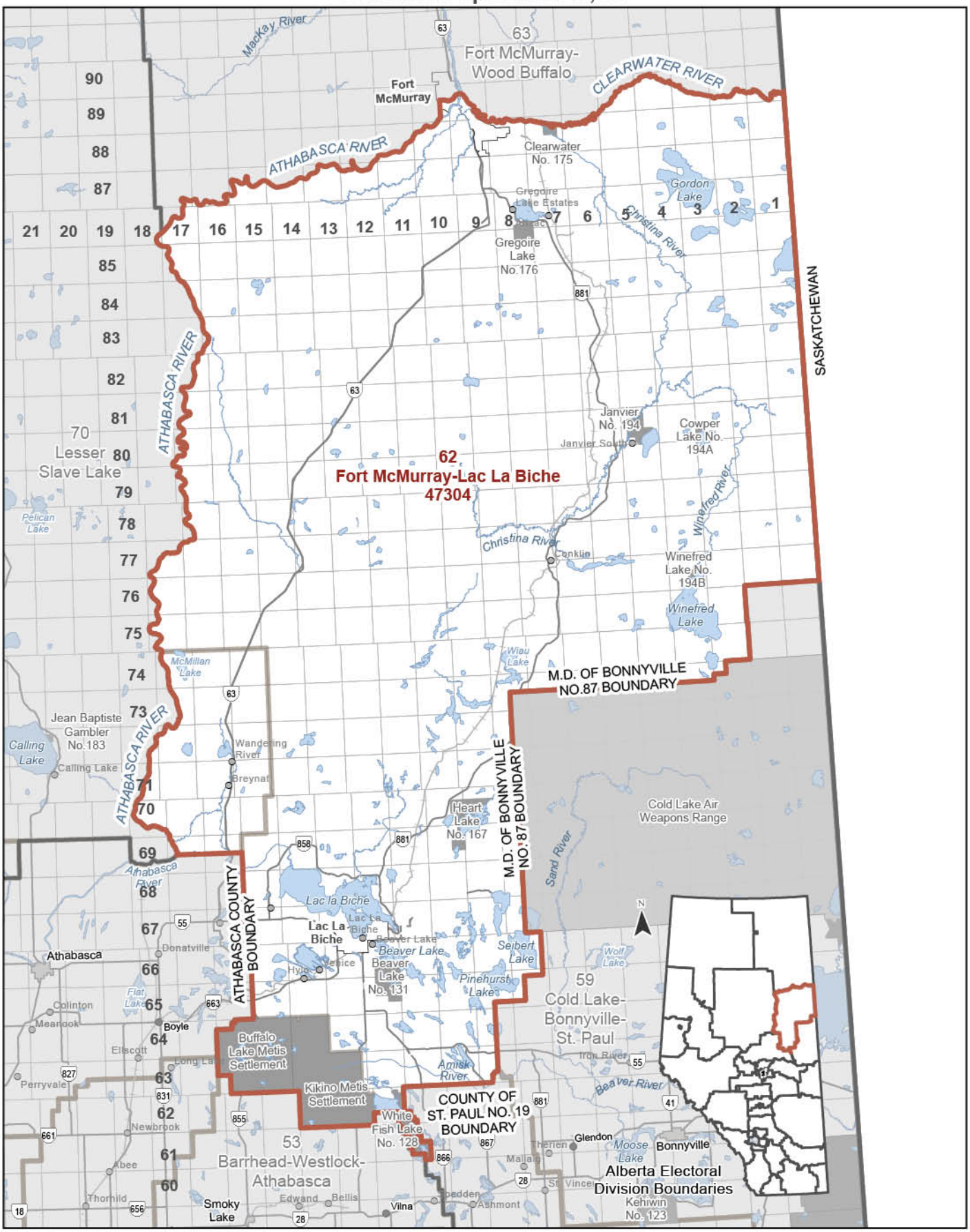
The first change is that Swan Hills and Fort Assiniboine are not recommended to be included in the Barrhead-Westlock-Athabasca electoral division. The 2025-2026 Electoral Boundaries Commission recommended putting Swan Hills and Fort Assiniboine in the Lesser Slave Lake electoral division. The reason was because the population of the Lesser Slave Lake electoral division had fallen below 50% of the average population of all electoral divisions in the Province. Recommending such an electoral division is not permitted by the Electoral Boundaries Commission Act. The Commission's reasoning therefore struck us as being reasonable.

Because of the expansion of the Legislature to 91 electoral divisions and the resulting drop in the average population of the Province's electoral divisions, the current boundaries of Lesser Slave Lake make it eligible for Section 15(2) status without additional territory being added. Accordingly, a case could be made that Lesser Slave Lake should revert to its current boundaries to preserve the *status quo* and increase the percentage of the population that is indigenous. We are nonetheless recommending keeping those areas in Lesser Slave Lake rather than the proposed Barrhead-Westlock-Athabasca for three reasons. First, the MLA for the current Athabasca-Barhead-Westlock expressed concerns about representing too many municipalities. Removing Swan Hills and Fort Assiniboine removes all portions of Big Lakes County and Woodlands County from his electoral division. Secondly, the rate of population growth in Lesser Slave Lake is very low indeed. Thirdly, it was suggested in Recommendation 5, that the Commission's majority map be maintained to the extent possible. Keeping its map of Lesser Slave Lake helps in that respect.

A second change to the current Athabasca-Barrhead-Westlock electoral division the panel recommends is to add the Saddle Lake Cree Nation's Reserve at the southeastern extremity of the electoral division. The Saddle Lake Cree Nation's Reserve is currently mapped in the Bonnyville-Cold Lake-St. Paul electoral division. The Saddle Lake Cree Nation claims roughly 11,000 members. Portions of the County of St. Paul were recommended by the 2025-2026 Electoral Boundaries Commission to be moved to Bonnyville-Cold Lake-St. Paul because it unites most of the County of St. Paul in the same electoral division. We concur in that recommendation.

We would propose to name this slightly modified electoral division "Barrhead-Westlock-Athabasca" electoral division. Like the current, Athabasca-Barrhead electoral division, it still contains Barrhead, Westlock and Athabasca, as well as Smoky Lake County, Boyle and Vilna. The 2025-2026 Electoral Boundaries Commission had recommended moving Smoky Lake County to Fort McMurray-Athabasca for reasons which no longer obtain and therefore the advisory panel is recommending it be put back into Barrhead-Westlock-Athabasca.

Fort McMurray-Lac La Biche
Estimated Population: 47,304



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Fort McMurray-Lac La Biche

As a consequence of the recommended restoration of the Lac Ste. Anne electoral division and the consequent restoration of Barrhead-Westlock-Athabasca, Fort McMurray-Lac La Biche is another electoral division which the advisory panel recommends be restored to its current boundaries.

The Fort McMurray-Lac La Biche electoral division, as mapped by the 2016-2017 Electoral Boundaries Commission, currently runs north from the Kikino Metis Settlement south of Lac La Biche to Lac La Biche, and then up Highway 881 paralleling the now defunct Alberta and Great Waterways Railway. The electoral division also parallels the main highway to Fort McMurray (Highway 63). It includes places like Plamondon, Wandering River, Janvier, Anzac, Gregoire Lake and portions of Fort McMurray, principally south of the Athabasca River. However, it also includes two communities in the City of Fort McMurray north of the Athabasca River south of Thickwood Boulevard, namely Martin Ridge Estates and Wood Buffalo Estates.

The 2025-2026 Electoral Boundaries Commission, because of the elimination of Lac Ste. Anne and changes made to Barrhead-Westlock-Athabasca, had to move all of Smoky Lake County and the Saddle Lake Cree Nation Reserve into Fort McMurray-Lac La Biche. But in order to prevent this redistribution resulting in excessive population in Fort McMurray-Lac La Biche, the Commission also recommended moving the two City of Fort McMurray communities north of the Athabasca River (Martin Ridge Estates and Wood Buffalo Estates) into the Fort McMurray-Wood Buffalo electoral divisions.

As a consequence of the restoration of Lac Ste. Anne and the restoration of Barrhead-Westlock-Athabasca, moving Smoky Lake County and the Saddle Lake Cree nation into Fort McMurray-Lac La Biche is no longer necessary. It is also no longer necessary to move the Fort McMurray communities of Martin Ridge Estates and Wood Buffalo Estates north of the Athabasca River and south of Thickwood Boulevard into Fort McMurray-Wood Buffalo. The Fort McMurray-Lac La Biche electoral division needs the population these communities provide.

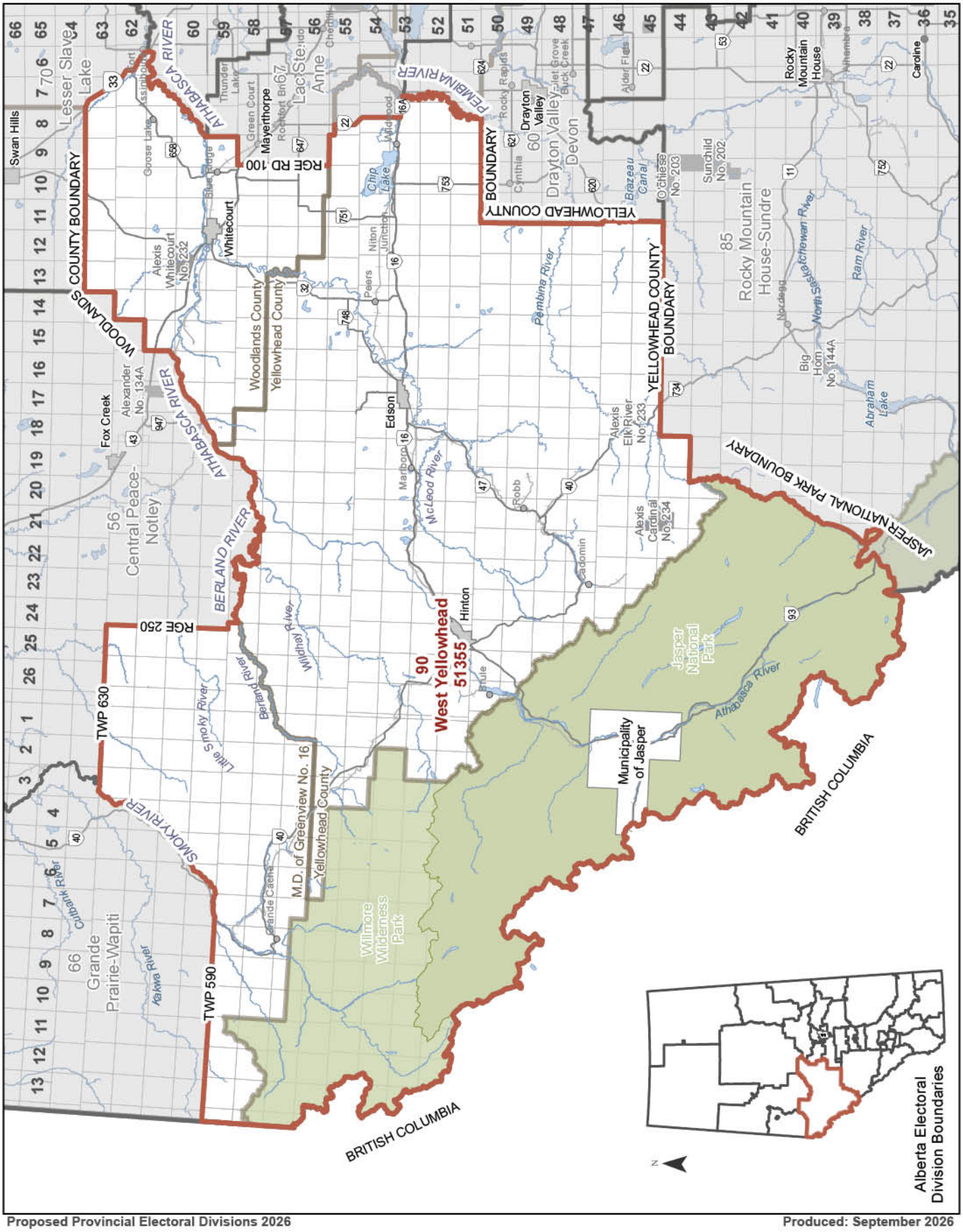
Fort McMurray-Lac La Biche is a very large electoral division. Unlike its neighbour to the north, Fort McMurray-Wood Buffalo, Fort McMurray-Lac La Biche has had population deficiency issues in the past. Fort McMurray-Wood Buffalo has not had a population issue because most of the City of Fort McMurray is in it.

Roughly speaking, Fort McMurray-Lac La Biche's western boundary is the Athabasca River. Its northern boundary is the Athabasca and Clearwater Rivers. Its eastern boundary is the Saskatchewan border and the Cold Lake Air Weapons Range, and its southern boundary is south of Lac La Biche. The 2025-2026 Electoral Boundaries Commission deemed it necessary to push the southern boundary south to Smoky Lake County and then to shed population, recommended moving its two urban communities north of the Athabasca into Fort McMurray-Wood Buffalo.

Suffice it to say that the advisory panel recommends moving Smoky Lake County into Barrhead-Westlock-Athabasca to give it necessary population, and, therefore, is not recommending moving Martin Ridge Estates and Wood Buffalo Estates into Fort McMurray-Wood Buffalo.

West Yellowhead

Estimated Population: 51,355



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

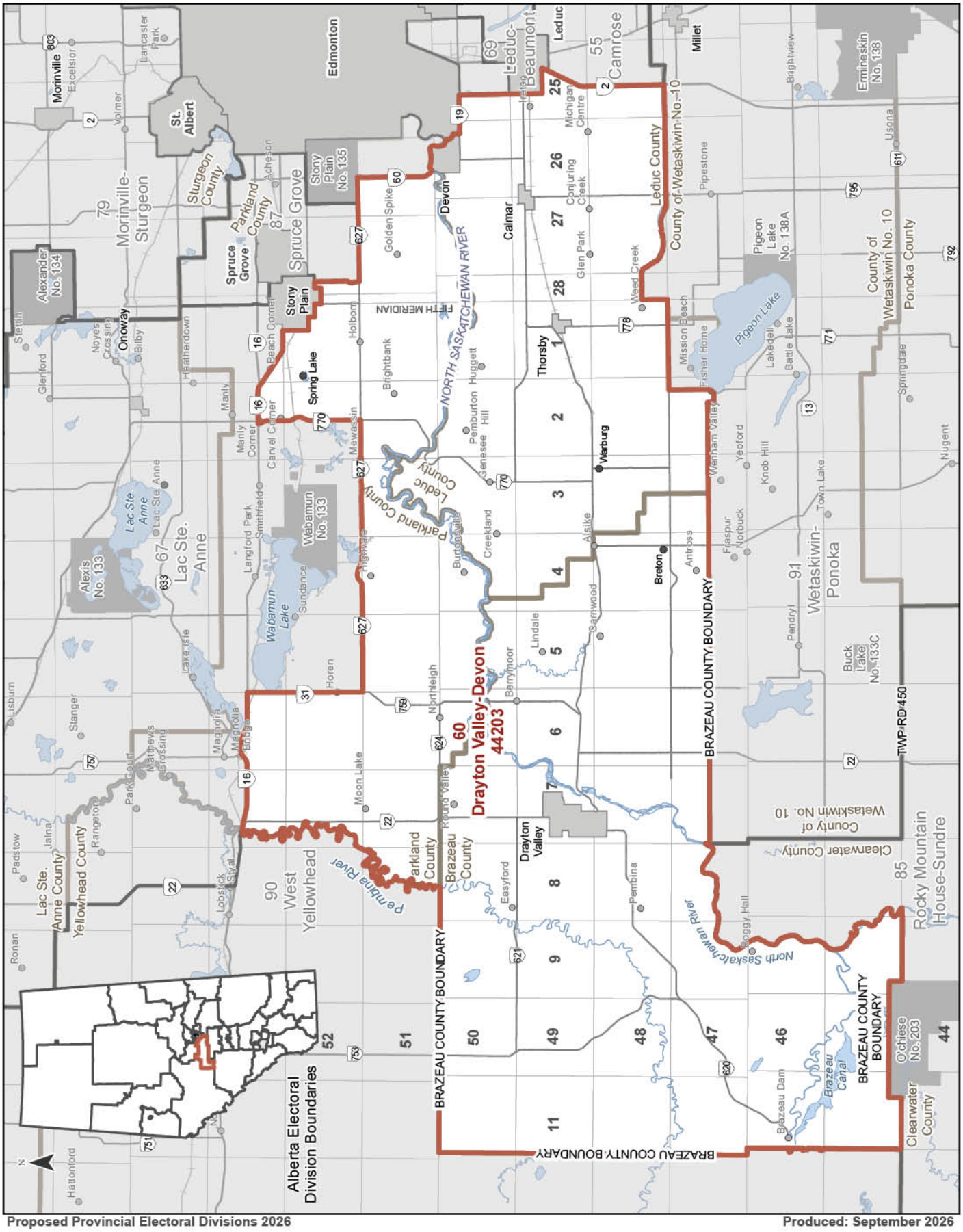
West Yellowhead

West Yellowhead is a huge electoral division including all of Jasper National Park and Willmore Wilderness Park. It also includes Whitecourt, Edson, Obed, Hinton, Grande Cache, Jasper, Cadomin, Robb and Coal Valley.

This is yet another electoral division which the 2025-2026 Electoral Boundaries Commission "reluctantly" had to change as a result of the removal of Lac Ste. Anne-Parkland, although the changes were not drastic.

In any event, the advisory panel is able to recommend its restoration. That restoration involved moving Mayerthorpe out of West Yellowhead, as mapped by the 2025-2026 Electoral Boundaries Commission, back into Lac Ste. Anne where it was situated in the last general election.

Drayton Valley-Devon
Estimated Population: 44,203



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Drayton Valley-Devon

Drayton Valley-Devon is another electoral division the panel is proposing be restored to roughly its current configuration.

The proposed restoration of the Drayton Valley-Devon electoral division was made possible by the restoration of the Lac Ste. Anne electoral division. Drayton Valley-Devon is located south of the Lac Ste. Anne electoral division, and its northern boundary was therefore impacted by the recommended restoration of Lac Ste. Anne. But, more importantly, the panel's review of the electoral divisions adjacent to Lac Ste. Anne suggested opportunities for electoral boundary improvements and/or rationalization. In its Interim Report, the 2025-2026 Electoral Boundaries Commission mapped this electoral division as a variant of the current Drayton Valley-Devon electoral division, which suggest to the advisory panel that, but for the deletion of Lac Ste. Anne-Parkland, the Commission might have mapped Drayton Valley-Devon much as we are now proposing. In its Final Report, the 2025-2026 Electoral Boundaries Commission mapped a Stony Plain-Drayton Valley electoral division. Devon, Thorsby, and Calmar were proposed to be put in a Leduc-Devon electoral division. This was not considered to be ideal.

The current (2017) Drayton Valley-Devon electoral division runs from Devon, through Calmar, Thorsby, Warburg, Alsike, Drayton Valley along Highway 39 and beyond to places like Lodgepole, Brazeau and Cynthia. It also straddles the North Saskatchewan River from Devon to Drayton Valley.

In its Final Report the 2025-2026 Electoral Boundaries Commission conceded that the relationship between Stony Plain and Drayton Valley was not obvious. The Commission relied on the geographic proximity of Stony Plain to Devon to recommend that they be put together in a Leduc-Devon electoral division. Arguably, the geographic proximity of Stony Plain to Lac Ste. Anne is equally strong. But, more importantly, the Commission's Interim Report recognized the desirability of preserving as much as possible the current (2017) electoral division of Drayton Valley-Devon. We agree.

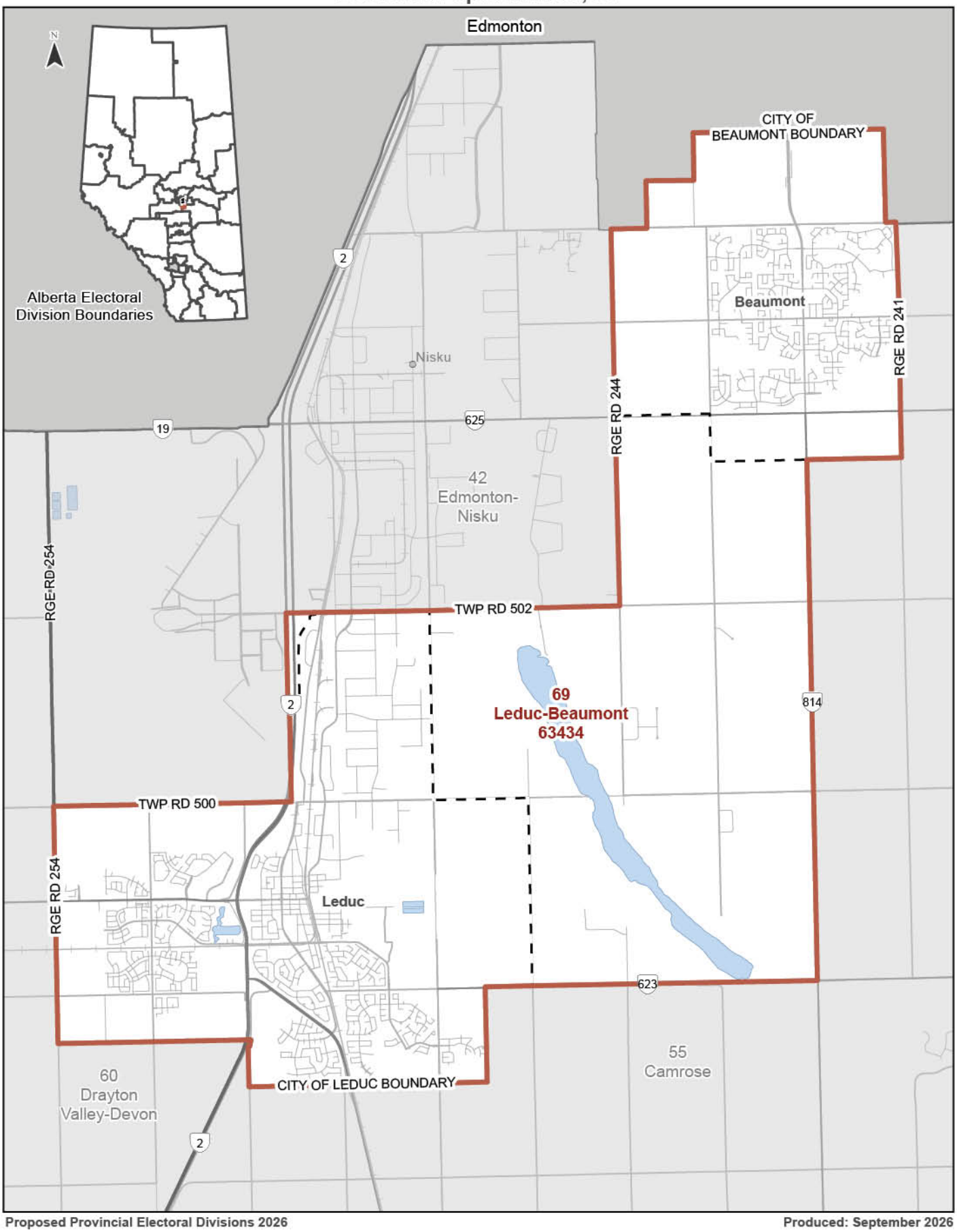
But with the elimination the Lac Ste. Anne electoral division, the Commission's Final Report changed the Drayton Valley-Devon electoral division drastically. Devon, Calmar and Thorsby were moved to a new Leduc-Devon electoral division. Lake Wabamun and surrounding communities, including the Paul First Nation Reserve, were proposed to be part of a Stony Plain-Drayton Valley electoral division. The Paul First Nation Reserve was thereby proposed to be in an electoral division separate and apart from the Alexis Nakoda Sioux Nations' Reserve around Lac Ste. Anne and Alexander Cree First Nation Reserve northwest of Edmonton, near the boundary between Lac Ste. Anne County and Sturgeon County.

The recommended restoration of a Lac Ste. Anne electoral division has given the advisory panel the opportunity to restore a Drayton Valley-Devon electoral division.

The current Drayton Valley-Devon electoral boundary makes a right turn at the intersection of Highway 22 and Highway 16 and heads east for several kilometres before heading south again on Highway 759 to avoid taking Lake Wabamun out of Lac Ste. Anne. We recommend that electoral boundary to keep Lake Wabamun in Lac Ste. Anne. It also keeps both Entwistle and Evansburg in Lac Ste. Anne. The separation of those two communities on either side of the Pembina River has been an issue before prior boundary commissions.

One final note, the eastern boundary of Drayton Valley-Devon is right next to the Edmonton International Airport and the Edmonton-Nisku electoral division. Further south the eastern boundary of Drayton Valley-Devon abuts the City of Leduc and the Leduc-Beaumont electoral division. There may need to be adjustments made to the eastern boundary of Drayton Valley-Devon to accommodate Edmonton-Nisku and Leduc-Beaumont.

Leduc-Beaumont
Estimated Population: 63,434



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Leduc-Beaumont

In his Addendum to the Majority Report, the Chairman of the 2025-2026 Electoral Boundaries Commission, and he alone, suggest that an all-party Committee of the Legislature might wish to study the idea of restoring Leduc-Beaumont, an electoral division which has been in place since 2010.

In accordance with its 2025-2026 Electoral Boundaries Commission Chair's suggestion, the advisory panel has studied and considered the suggestion that Leduc-Beaumont be restored and we unanimously recommend it. It makes sense to put Leduc and Beaumont in a single division.

Residents of Leduc and Beaumont, as well as their mayors, asked for this electoral division. The negative reaction by people in Beaumont to being paired with Sherwood Park, which was recommended in the 2025-2026 Electoral Boundaries Commission's Interim Report, caused Commission Chairman Miller and our advisory panel to consider whether pairing Beaumont with Leduc might be more acceptable. This was a situation in which residents had asked to be put in an electoral division with a significantly higher than average population. That request lends some legitimacy to the advisory panel's questioning of the importance of population parity as a consideration in achieving effective representation when people are prepared to forego such parity in favour of being in an electoral division that suits their needs.

But it is important to understand the mapping of this electoral division because there are lessons in it for those who wish to understand the electoral boundaries-making process.

The 2010 Electoral Boundaries Commission put Leduc and Beaumont together with Nisku. Likewise, the 2017 Electoral Boundaries Commission mapped Leduc and Beaumont together. The 2025-2026 Electoral Boundaries Commission, in its Interim Report, proposed a Leduc-Beaumont electoral division but with only the western half of Beaumont in it. The eastern half was put in an electoral division with Strathcona-Sherwood Park. No reason was given for the decision to move the eastern half of Beaumont to Strathcona-Sherwood Park, although it was likely due to the population growth of the two cities. But because half of Beaumont was moved to Sherwood Park, the remaining Leduc-Beaumont electoral division actually had to be enlarged to increase its population.

Then, in its Final Report, the 2025-2026 Electoral Boundaries Commission recommended a completely different configuration. It put Leduc and Beaumont in separate electoral divisions. The City of Beaumont, in its entirety, was put in an Edmonton electoral division. The Commission called the Edmonton-Beaumont electoral division "the most significant hybrid electoral division" it proposed. What made it "the most significant" was not explained.

Notwithstanding that there was more support for Beaumont to be united with Leduc than to be united with Edmonton, the Commission said that such an electoral division would not only have had an undesirably high population (in excess of 68,000 people in the two cities alone) but it would have had "significant cascading consequences on the rest of the Province which would have impeded effective representation." No explanation was given as to what cascading consequences were being referred to, let alone how they could affect the rest of the Province.

As stated above, in his Addendum to the Majority Report, the Chairman of the Commission, and he alone, appeared to have had second thoughts about the Commission's recommendation to separate Leduc and Beaumont because he suggested that an all-party Committee of the Legislature might wish to study restoring the Leduc-Beaumont electoral division. The restoration of Leduc-Beaumont was not a condition of the Chairman's recommendation to restore the two deleted rural electoral divisions as two of our panel members suggest. Its connection to the restorations was not explained. The Chairman's suggestion was simply that a Committee of the Legislature study the matter. The advisory panel has now studied it and is recommending that Leduc and Beaumont be rejoined in an electoral division. And in making the recommendation, the advisory panel, like the Commission Chairman, does no more than make a recommendation that differs from the recommendation of the Majority of the 2025-2026 Electoral

Boundaries Commission. Differing recommendations by succeeding electoral boundaries commissions are a normal part of the electoral boundary determination process. Differing recommendations by different Commission members are also normal.

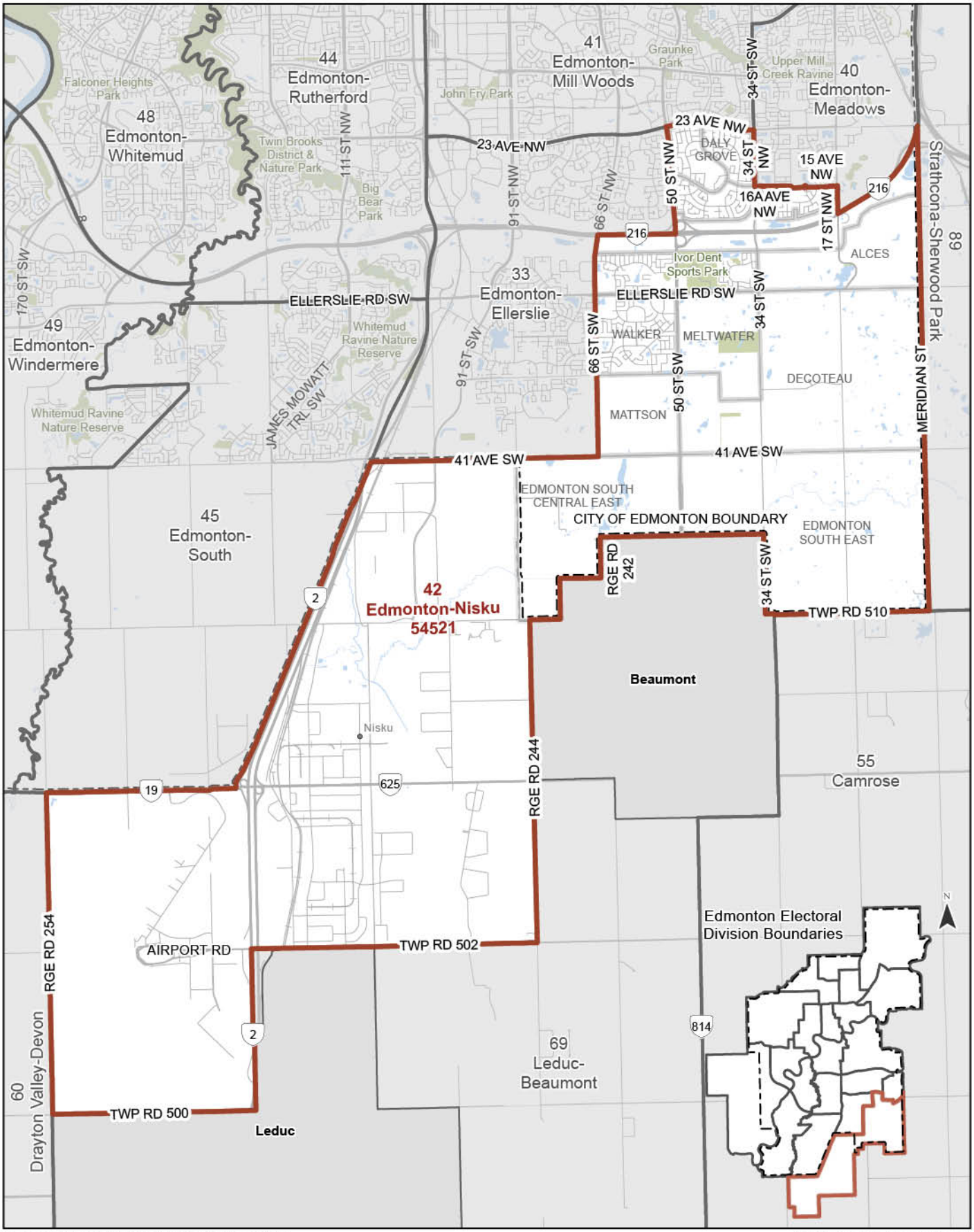
The point also being made here is that electoral mapping is an iterative process in which even electoral boundary commissions have second thoughts about their own recommendations. Likewise, there is nothing wrong or irregular with the Legislature directing the advisory panel to review the Province's electoral divisions with a view to providing a "second opinion" or "second thoughts", so to speak.

While the advisory panel is unanimously inclined to recommend a Leduc-Beaumont electoral division, the problem of its significantly higher than average population remains. And so, to reduce this high population the independent advisory panel recommends including Nisku, the Edmonton International Airport and areas around it into a new south Edmonton electoral division we propose to be named "Edmonton-Nisku". The recommended Edmonton-Nisku electoral division is not an additional electoral division. It would simply replace the loss of the Edmonton-Beaumont electoral division.

Edmonton-Nisku would consist of Edmonton-South East electoral division, Nisku and areas north of Airport Road east of Highway 2 and west of the Leduc-Beaumont electoral division. The creation of a new electoral division also led the advisory panel to consider the restoration of Edmonton-Strathcona, Edmonton-Whitemud, Edmonton-South West (also known as Edmonton-Windermere), Edmonton-South, Edmonton-Meadows, Edmonton-Mill Woods and Edmonton-Ellerslie to configurations similar to that which currently exist but subject to the changes which the 2025-2026 Electoral Boundaries Commission recommended in its Interim Report. The result of that reconsideration was to recommend restoring these electoral divisions to those configurations. We deal with those electoral divisions individually later in this report.

Edmonton-Nisku

Estimated Population: 54,521



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Nisku

Having recommended the restoration of a Leduc-Beaumont electoral division because of the support shown for it, the advisory panel had to deal with the problem of the electoral division having a significantly higher than average population. The panel dealt with that problem by moving some of the areas in and around Leduc and Beaumont into a new south Edmonton electoral division named Edmonton-Nisku.

To prevent the population of Leduc-Beaumont being unreasonably high, the panel recommends including Nisku Industrial Park and surrounding areas in this electoral division. For example, we are also including Edmonton Internation Airport and its surrounding areas. These areas are obviously integrated into south Edmonton's economy, and residents are highly likely to receive services in southeast Edmonton. Including them in an Edmonton-Nisku electoral division is accordingly reasonable. The electoral division's shape may look odd. But it is justified given the clear community of interest between Nisku and southeast Edmonton, and the desirability of the borders of neighbouring electoral divisions.

Edmonton-Nisku is a new electoral division with territory taken from Leduc-Beaumont, but also from Edmonton-Ellerslie, Edmonton-South and Edmonton Meadows. The electoral division which the panel recommends is located roughly where Edmonton-South East was recommended to be located in the 2025-2026 Electoral Boundaries Commission's Interim Report. It includes Nisku Industrial Park and surrounding areas. It also includes areas north of Beaumont straddling 50th Street, the main road connection between Beaumont and Edmonton. Its northern boundary is roughly the Anthony Henday Drive although its electoral boundary does cross over the Anthony Henday Drive to take in a bit of Edmonton-Ellerslie and Edmonton-Meadows. Its eastern boundary is Edmonton's eastern city limits.

Most of the new Edmonton-Nisku electoral division is within the City of Edmonton, although, of course, it also takes in northwestern portions of Leduc County. The Edmonton portions are:

1) Areas in the City of Edmonton, south of 41st Avenue SW, east of Gateway Boulevard, and west of the City of Edmonton's eastern limits (taken from Edmonton-Ellerslie and Edmonton-South);

2) Areas north of 41st Avenue SW, east of 66th Street SW, south of Anthony Henday Drive, and west of the city's eastern limits (taken from Edmonton-Ellerslie);

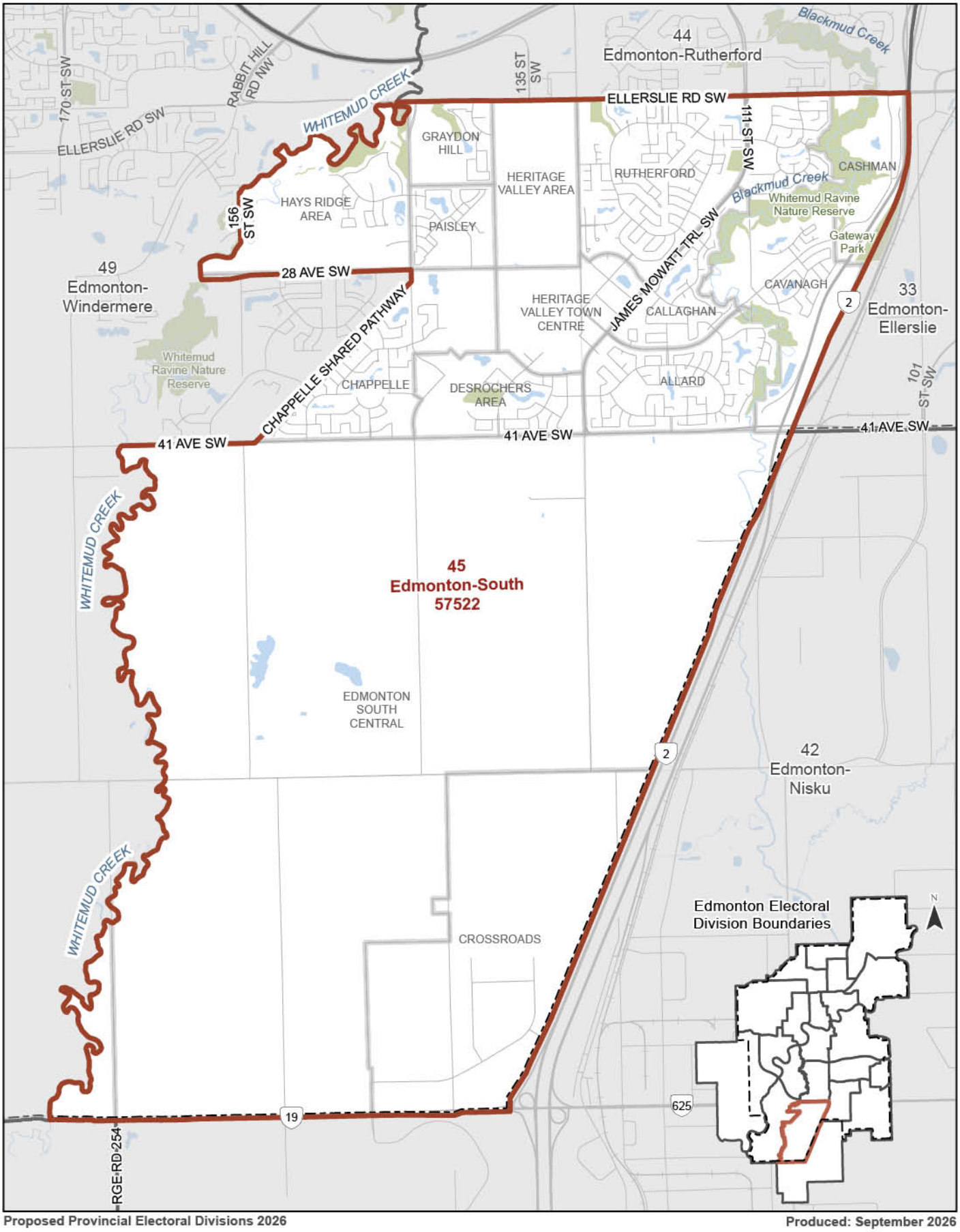
3) Areas north of Anthony Henday Drive, east of 34th Street NW, south of 16A or 15th Avenue NW and west of 17th Street NW (taken from Edmonton-Ellerslie and Edmonton Meadows); and

4) Areas north of Anthony Henday Drive, east of 50th Street NW, south of 23rd Avenue NW, and west of 34th Street NW (taken from Edmonton-Ellerslie).

We have no concerns with the boundaries of this electoral division extending beyond the City limits because it clearly unites communities of interest in southeast Edmonton.

Edmonton-South

Estimated Population: 57,522



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-South

Edmonton-South is an electoral division west of Highway 2 (Calgary Trail or Gateway Boulevard). It runs from the City of Edmonton's southern limits north to Ellerslie Road. Its western boundary follows Whitemud Creek for most of its length. Edmonton-South is a rapidly growing electoral division. Subject to the changes described below, the electoral division that the panel recommends is very similar to that which currently exists and has existed since at least 2017.

The elimination of Edmonton-Beaumont and the creation of Edmonton-Nisku enabled the current boundaries of this electoral division to be restored subject to the following changes:

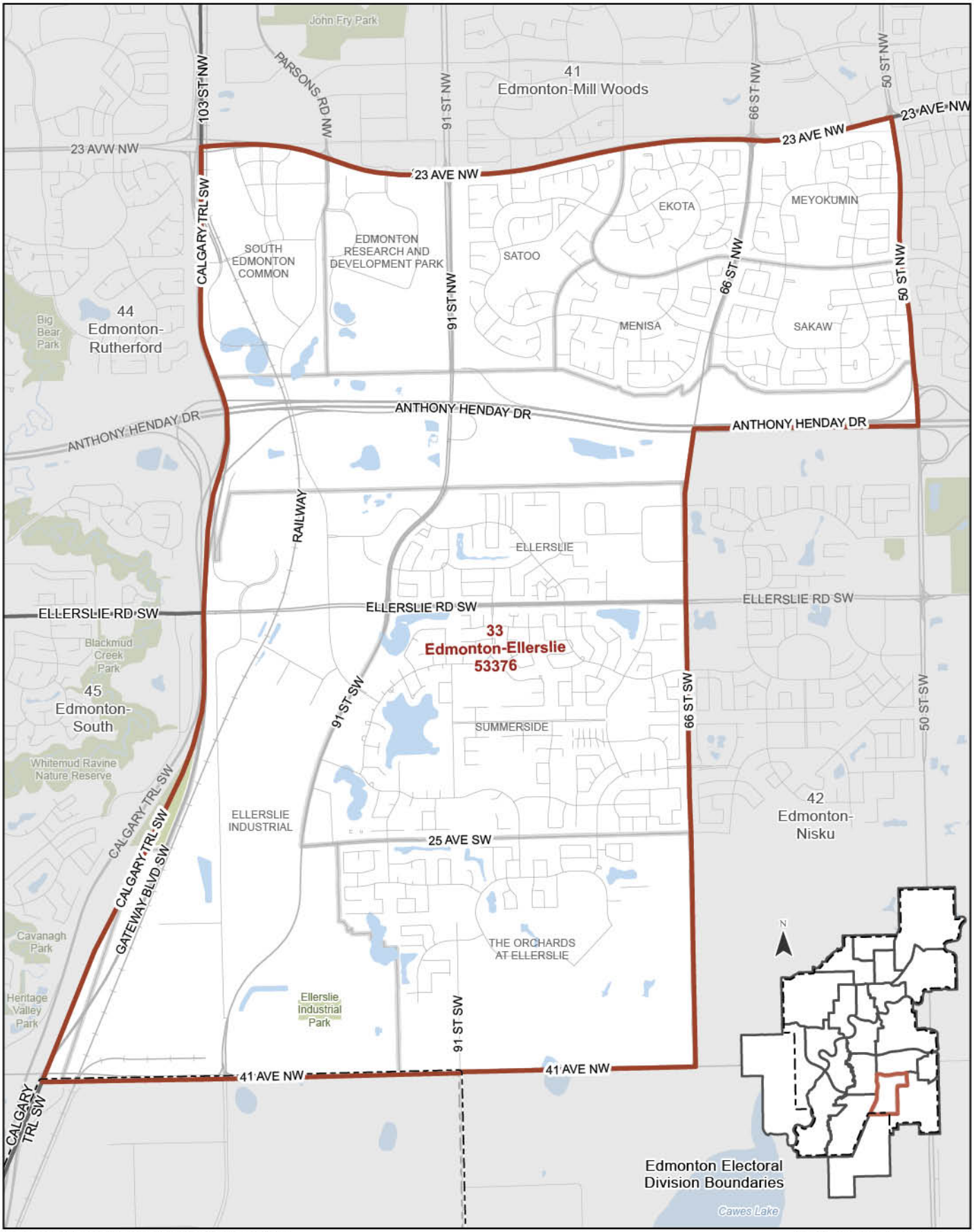
1. It is proposed that this electoral division lose territory along its northern boundary, given its growth in population. All areas north of Ellerslie Road and west of Gateway Boulevard are recommended to be moved to Edmonton-Rutherford.
2. Areas north of Anthony Henday Drive and west of Whitemud Creek are proposed to be moved to Edmonton-Whitemud. This will help balance the populations in the electoral divisions and create clearer boundaries.
3. In addition, it is proposed that the community of Chappelle Gardens be moved to Edmonton-South West (which the 2025-2026 Electoral Boundaries Commission renamed Edmonton-Windermere) to reduce the population of Edmonton-South.
4. And, 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 also to reduce the population of Edmonton-South.

We are now able to recommend an electoral division with clearer and more understandable boundaries.

This electoral division brings together several neighbourhoods in south Edmonton with clearer boundaries. The population remains high, as does its growth potential, but it is much lower than under the current boundaries.

Edmonton-Ellerslie

Estimated Population: 53,376



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Ellerslie

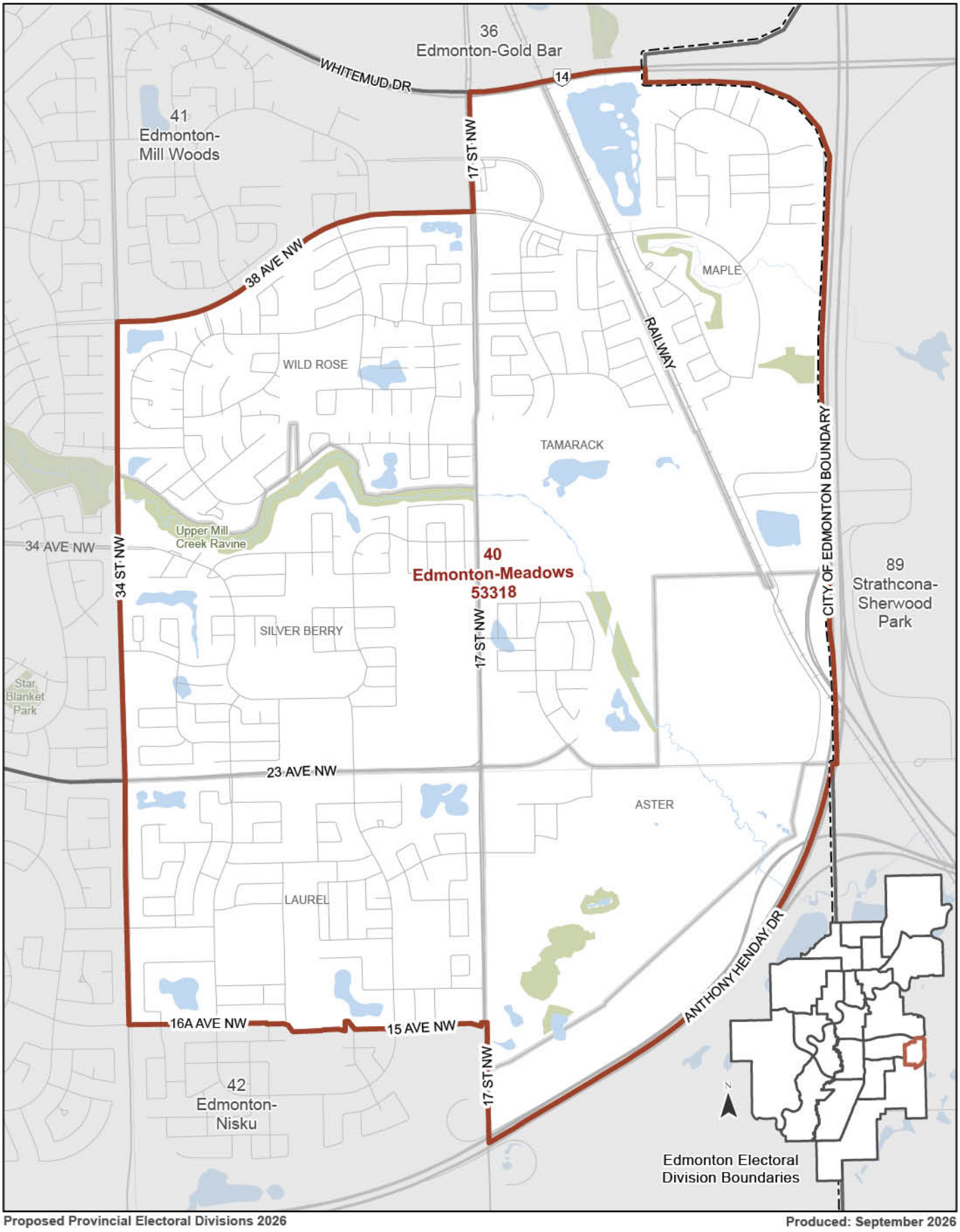
The advisory panel's recommendation to restore a Leduc-Beaumont electoral division, as suggested by the Chair of the 2025-2026 Electoral Boundaries Commission, required the creation of a new electoral division to replace the Edmonton-Beaumont electoral division, namely Edmonton-Nisku. In order to create Edmonton-Nisku, all areas of Edmonton-Ellerslie east of 50th Street N.W. and north of the Anthony Henday Drive are recommended to be moved to Edmonton-Nisku. However, the Edmonton-Ellerslie electoral division gains areas south of 25th Avenue S.W. and east of Gateway Boulevard from the Edmonton-South electoral division which previously straddled Gateway Boulevard. That straddling was not considered ideal and has now been eliminated.

As a consequence, Edmonton-Ellerslie, arguably, becomes a more reasonable and understandable electoral division on the east side of Highway 2 or Gateway Boulevard, running from the City's south city limit (41st Avenue S.W.) north to 23rd Avenue N.W. (i.e. north of the Anthony Henday Drive). Its eastern boundary, south of the Anthony Henday Drive, is 66th Street S. W. Its eastern boundary, north of the Anthony Henday Drive, is 50th Street N.W. while its north boundary is 23rd Avenue N.W.

The electoral division consists of the Mill Woods communities of Satoo, Knottwood, Menisa, Ekota, and Sakaw north of the Anthony Henday Drive and the neighborhoods of Ellerslie, Summerside and the Orchards at Ellerslie south of Anthony Henday Drive.

It has clear boundaries and a reasonable, if growing, population.

Edmonton-Meadows
Estimated Population: 53,318



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

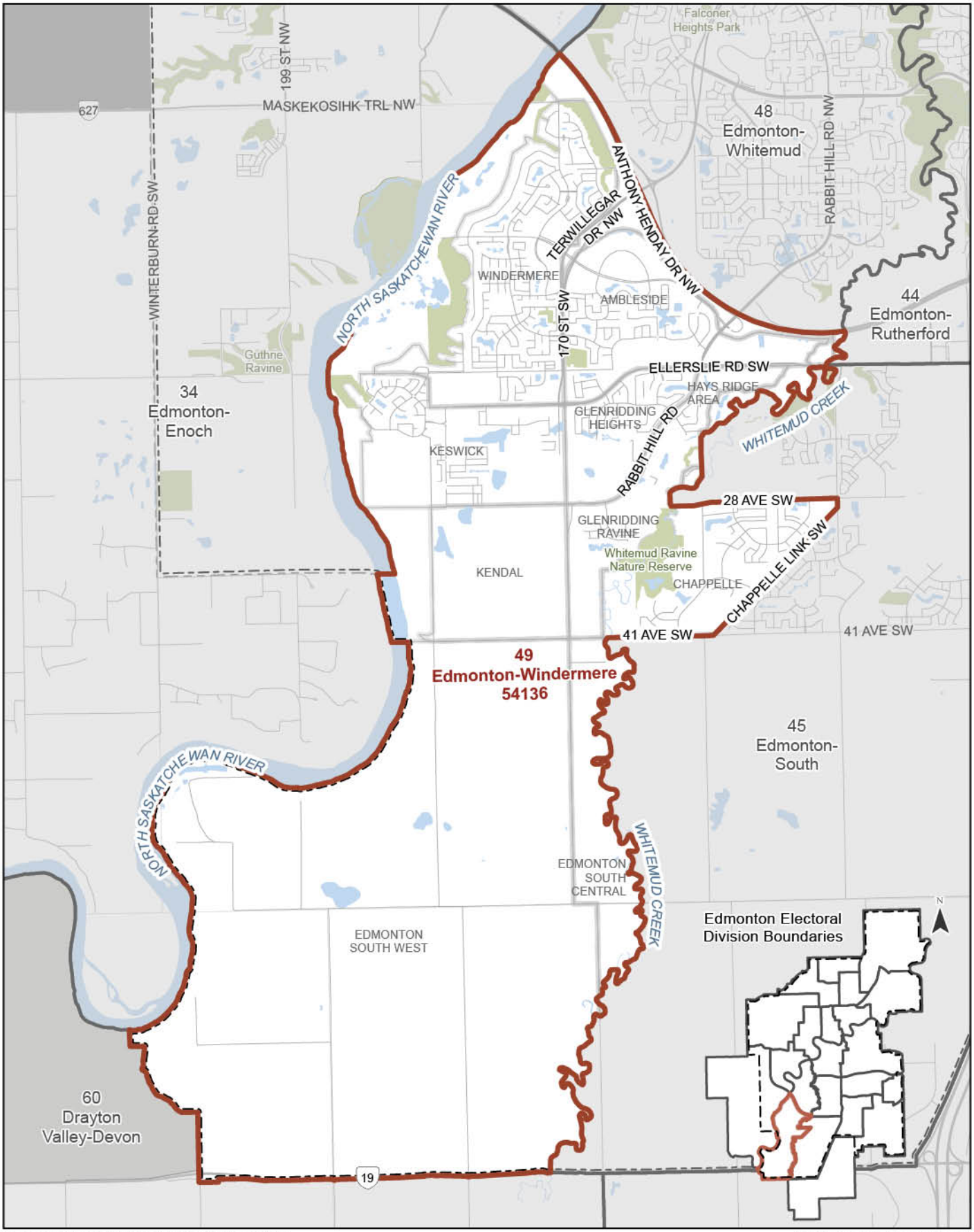
Edmonton-Meadows

Edmonton-Meadows is an electoral division east of Edmonton-Mill Woods and Edmonton-Ellerslie bordering Edmonton's eastern city limits. The 2025-2026 Electoral Boundaries Commission recommended that western portions of the current Edmonton-Meadows electoral division west of 34th Street N.W. be moved into Edmonton-Mill Woods and Edmonton-Ellerslie to create Edmonton-Beaumont. The removal of Edmonton-Beaumont has not changed that. Since we are adopting the recommendations of the Commission's Interim Report, it is still recommended that the western portions of the electoral division be moved into Edmonton-Mill Woods and Edmonton-Ellerslie.

The Edmonton-Meadows electoral division as mapped by the 2025-2026 Electoral Boundaries Commission in its Interim Report (and in its Final Report) has clear and understandable boundaries. Its northern boundary is still Whitemud Drive or Highway 14 (the highway to Viking and Wainwright) and 38th Avenue N.W. Its southern boundary is still Anthony Henday Drive and 16A Avenue N.W. Its western boundary is still 34th Street N.W. and its eastern boundary is Edmonton's city limits or a north-south portion of the Anthony Henday Drive.

Rapid growth is anticipated in this area and so its smaller than average population is justified for the Edmonton-Meadows electoral division. Its smaller geographic size facilitates effective representation.

Edmonton-Windermere
Estimated Population: 54,136



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Windermere

Edmonton-South West (which the 2025-2026 Electoral Boundaries Commission renamed Edmonton-Windermere in its Final Report) is currently a north-south electoral division between the City's southern boundary (Highway 19 to Devon) and Anthony Henday Drive. It is bounded on the east by Whitemud Creek and the Edmonton-South electoral division. Its current (2017) configuration, which we recommend changing, straddles the North Saskatchewan River on the west. In short, it lies between Devon and the Edmonton International Airport at its south end and the Anthony Henday Drive at its northern end.

In its Interim Report, the 2025-2026 Electoral Boundaries Commission recommended moving the western boundary of the electoral division east to the North Saskatchewan River such that the electoral division would no longer have to straddle the river. The advisory panel concurs in that recommendation which, if approved, would put residents west of the river in either Edmonton-West Enoch or Edmonton-McLung.

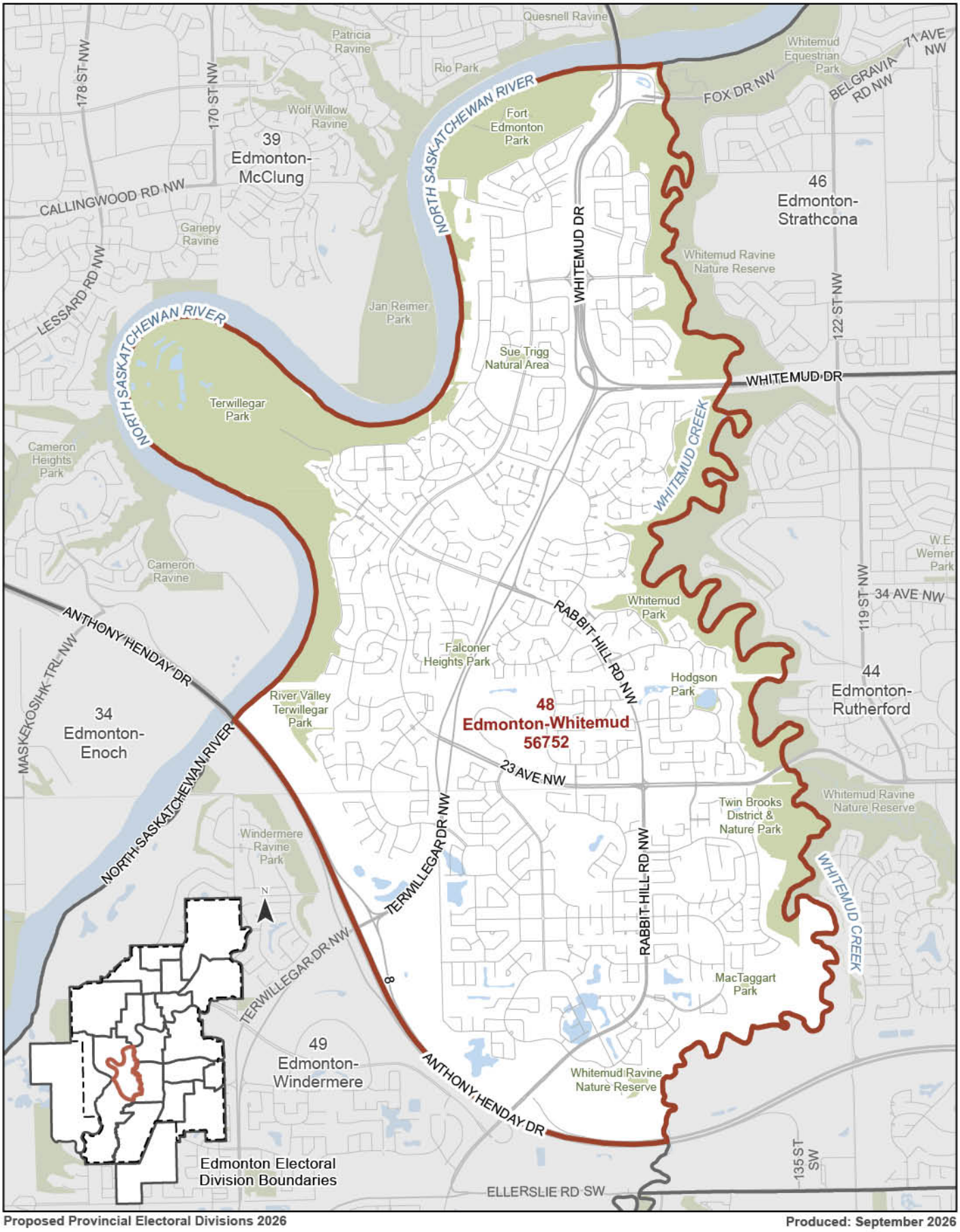
In its Interim Report, the 2025-2026 Electoral Boundaries Commission also adjusted the eastern boundary of the electoral division somewhat, departing from Whitemud Creek between 28th Avenue and 41st. Avenue S.W. along Chappelle Link S.W. The neighbourhood of Chappelle Gardens was recommended to be moved from Edmonton-South into Edmonton-South West (Edmonton-Windermere) to accommodate significant anticipated growth in Edmonton-South. The advisory panel concurs in that recommendation. But for the most part the electoral division's eastern boundary is recommended to be Whitemud Creek which is the current eastern boundary of the electoral division.

The electoral division's population, though lower than the provincial average, is still within variance and rapid growth is expected. Because the electoral division no longer crosses the North Saskatchewan River or the Anthony Henday Drive, it may be an easier electoral division for an elected representative to traverse and represent. It is smaller and arguably more understandable.

The 2025-2026 Electoral Boundaries Commission, in its Final Report, recommended that the name of the electoral division be changed from Edmonton-South West to Edmonton-Windermere because the cardinal points of the compass are not as helpful as the name of a defining neighborhood, road or popular golf course in describing an electoral division. The advisory panel concurs in that recommendation.

Edmonton-Whitemud

Estimated Population: 56,752



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Whitemud

Three changes to this electoral division as recommended by the 2025-2026 Electoral Boundaries Commission are also recommended by the advisory panel.

The first is to add an area east of Rabbit Hill Road north of the Anthony Henday Drive between Rabbit Hill Road and Whitemud Creek. This was recommended by the 2025-2026 Electoral Boundaries Commission in its Interim Report and Final Report.

Secondly, instead of the eastern boundary following Whitemud Drive north to the North Saskatchewan River, the advisory panel recommends it follow Whitemud Creek north to the River. Areas west of Whitemud Creek (between Whitemud Creek and Whitemud Drive) have thereby been added to the electoral division. Reverting back to the Whitemud Creek boundary increases the population of the electoral division.

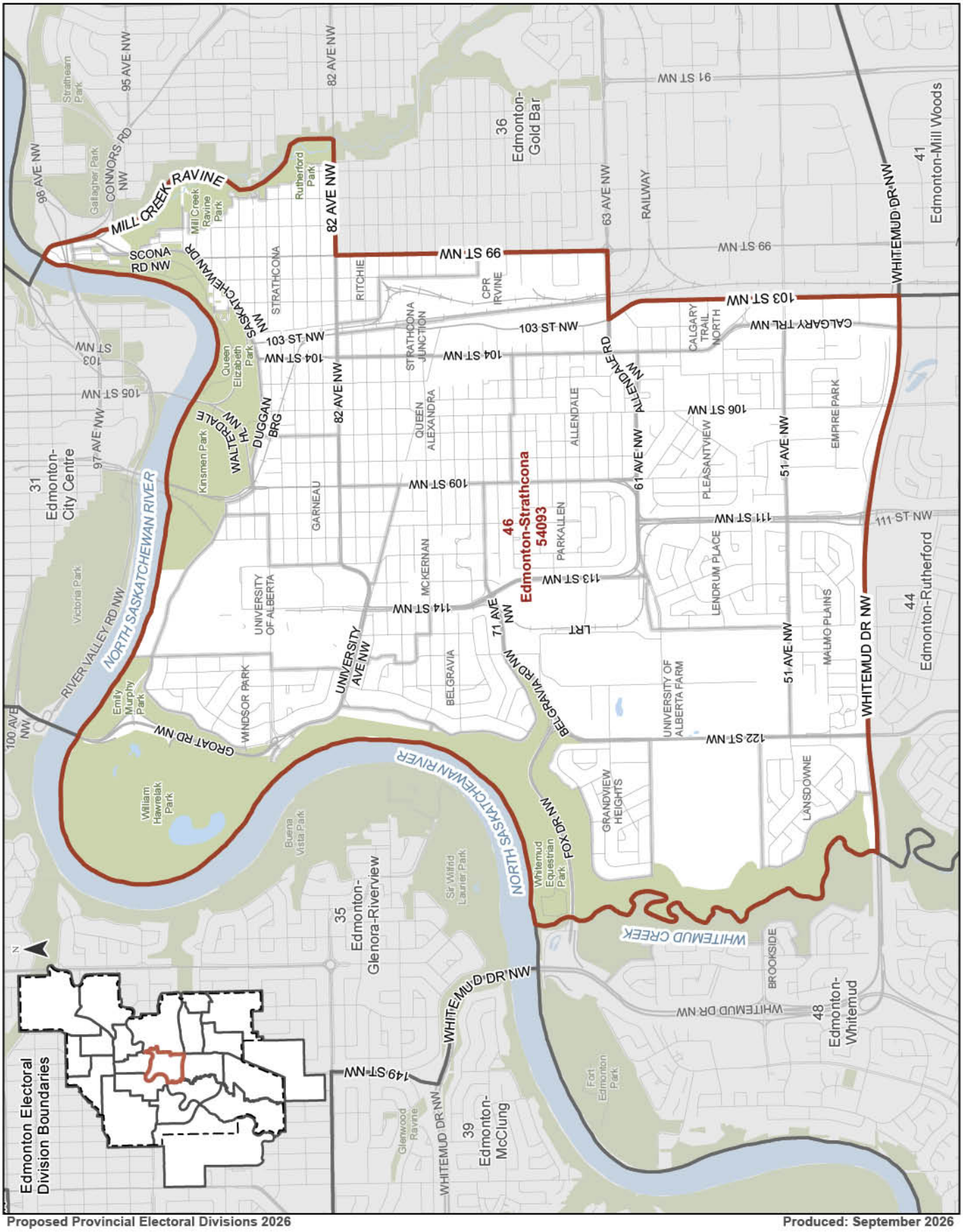
Thirdly, all areas south of Anthony Henday Drive are recommended to be removed. This makes a lot of sense. The Anthony Henday is a major barrier both physically and psychologically.

Adding the area between Rabbit Hill Road and Whitemud Creek makes the Edmonton-Whitemud electoral division, arguably, a clearer and more understandable electoral division between the Anthony Henday Drive on the south and the North Saskatchewan River on the north, with Whitemud Creek forming its eastern boundary and the North Saskatchewan River forming not only its northern boundary but also its western boundary. The electoral division now has a configuration similar to Edmonton-South West (Edmonton-Windermere) to the south.

The recommended mapping also addressed a criticism of the current mapping by bringing Magrath Heights and Mactaggart, two Terwillegar communities, into the electoral division with the rest of Terwillegar.

Edmonton-Strathcona

Estimated Population: 54,093



Edmonton-Strathcona

The advisory panel reviewed this electoral division and recommends mapping the Edmonton-Strathcona electoral division as it was mapped in the Commission's Interim Report. The difference between the mapping of Edmonton-Strathcona in the Commission's Interim Report and its mapping of the electoral division in its Final Report was marginal. In the Interim Report, the west boundary of the electoral division was Whitemud Creek. In the Final Report, it was Whitemud Drive (the freeway). The panel recommends that the west boundary be Whitemud Creek.

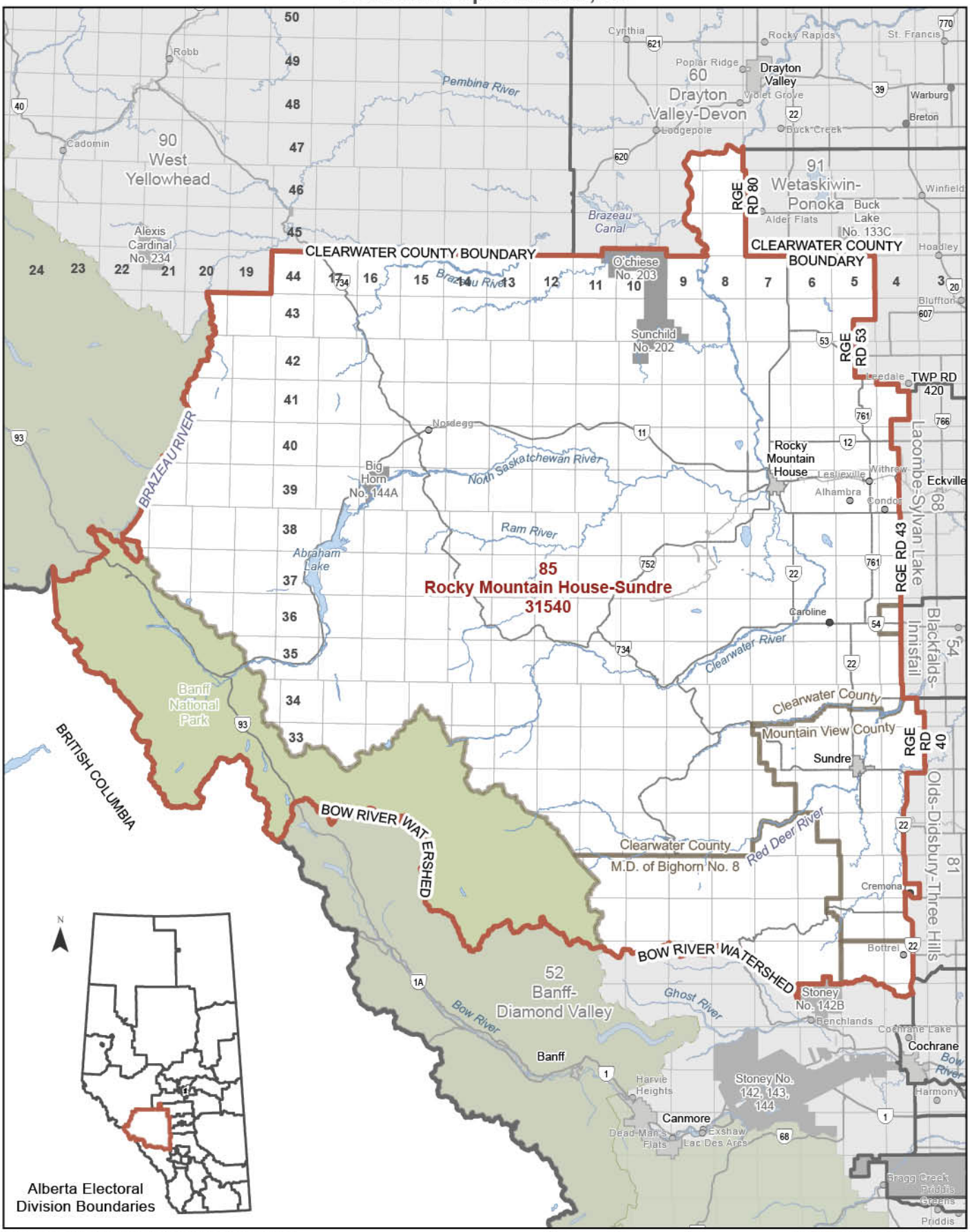
The Edmonton-Strathcona electoral division has been around for at least 50 years in different configurations and with different names and so the advisory panel is not inclined to recommend anything different.

Other changes the 2025-2026 Electoral Boundaries Commission recommended to the current (2017) electoral division were to move portions east of 99th Street and north of 63rd Avenue or Argyll Road into Edmonton Gold Bar (neighborhoods like Ritchie, Hazeldean and Argyll). The Commission also expanded the electoral division to the west to take in portions of Edmonton Riverview electoral division, (i.e. McKernan, Parkallen, Belgravia, Windsor Park, Grandview Heights and Lansdowne). The advisory panel concurs with the foregoing Commission recommendations.

The resultant electoral division makes a lot of sense. Some would argue it is now a University of Alberta centered electoral division, bounded on the south by Whitemud Drive, on the north by the North Saskatchewan River, on the west, by Whitemud Creek and on the east by Gateway Boulevard, 99th Street N.W. and the Mill Creek Ravine.

Rocky Mountain House-Sundre

Estimated Population: 31,540



Proposed Provincial Electoral Divisions 2026 **Produced: September 2026**

Rocky Mountain House-Sundre

This is one of two electoral divisions that the Chairman of the 2025-2026 Electoral Boundaries Commission, in his Addendum to the Majority Report, recommended be restored. The other was Lac Ste. Anne.

In their Interim Report, the Commission proposed to remove the current Rimbey-Rocky Mountain House-Sundre electoral division and replace it with a much larger electoral division comprised of portions of the deleted electoral division and portions of Lacombe County including Gull Lake, Bentley, Lacombe, Blackfalds, Clive and Alix, stretching east to Buffalo Lake, but not including Rimbey or Sundre. The recommended replacement was an elongated east-west electoral division, as opposed to one simply bordering the Eastern Slopes.

The problem facing the Commission was that population increases in Calgary and Edmonton and other urban municipalities were deemed to require four new urban ridings, which meant removing two rural electoral divisions. Prior to the Commission commencing its review, the Electoral Boundaries Commissions Act was amended to add only two additional electoral divisions (87 to 89). The Commission considered that the two additional electoral divisions would have to go to Edmonton and Calgary, one to each city. But since Calgary's population had grown even more dramatically than Edmonton's population, the Commission also recommended a second additional electoral division for Calgary.

In addition to recommending two additional seats for Calgary and one for Edmonton, the Commission was also of the view that population changes in Airdrie and Cochrane also required that those two cities share three electoral divisions instead of two.

The consequence of the Commission's recommendations to add effectively four seats to the cities was the need to reduce the number of seats in rural Alberta by two. The Commission had only a finite number of seats to map (89). And so, the Commission had to delete two rural seats to permit the four new urban ones. The Commission recommended removing Rimbey-Rocky Mountain House-Sundre and Lac Ste. Anne. However, the Commission did so reluctantly and expressed a concern about the cascading effects of having to create several enlarged electoral divisions to cover the areas once covered by the two electoral divisions which were eliminated.

Following the tabling of the Commission's Final Report replacing the Rimbey-Rocky Mountain House-Sundre electoral division with the Lacombe-Clearwater electoral division, the Mayors of Lacombe and Blackfalds expressed displeasure at having their municipalities be a part of a huge electoral division with Rocky Mountain House and Nordegg.

The Chairman of the 2025-2026 Electoral Boundaries Commission was very much aware of this dissatisfaction. In his Addendum to the Majority Report, Justice Miller pointed out that much of the objection to the Commission's Interim Report was based on the loss of the two rural seats. He expressly lamented those losses. He went on to state that if the Commission had been given 91 electoral divisions, there would have been no loss of any seats outside of Edmonton and Calgary; although he conceded that his majority colleagues did not agree with him on this.

Regardless, the Chairman then formulated an alternative recommendation in order to dissuade the Legislature from accepting the Minority Report of the Commission's dissenting members. And that recommendation was Recommendation 5. Recommendation 5 was the Chairman's recommendation and his alone. For reasons which were not explained, the other members of his majority did not concur.

The recommendation was that if the Legislative Assembly found itself unable to concur in the recommendations of the majority to remove the two electoral divisions, it should amend the Electoral Divisions Act to increase the number of electoral divisions to 91 and restore the two electoral divisions that the Commission reluctantly recommended removing.

The Legislature responded to the Chairman's recommendation by urging the Government to introduce a Bill increasing the size of the Legislature. The Legislature also appointed an independent advisory panel to conduct a review of the Province's electoral divisions. In conducting that review, the advisory panel was mandated to incorporate the Chairman's recommendation subject to any modifications the panel considered necessary.

The panel has now incorporated the Chairman's recommendations, with respect to the Rocky Mountain House electoral division. The panel is recommending that it be mapped as described below. Because of that restoration, the panel has also been able to recommend arguably more logical electoral divisions along Highway 2 between Calgary and Edmonton. Those recommendations come later in this report.

With respect to the current Rimbey-Rocky Mountain-Sundre electoral division, the advisory panel recommends replacing it with a similar electoral division named Rocky Mountain House-Sundre. Rimbey is not recommended for inclusion in the restored electoral division.

The new Rocky Mountain House-Sundre electoral division's southern boundary meanders west along a watershed northwest of Cochrane to the B.C. Border. Its western boundary follows the B.C. Border north to the Brazeau River and then northeast along the Brazeau River to the northern boundary of Clearwater County which is recommended to form the northern boundary of the electoral division as well. The electoral division includes the Saulteaux/Cree First Nations' O'Chiese and Sunchild Reserves in the north. Its eastern boundary is roughly a north-south line just east of the Highway 22 corridor which runs north-south up the spine of the Province's "West Country". The electoral division includes Sundre, Caroline, Rocky Mountain House and Nordegg, but not Rimbey, which we have recommended be put in Wetaskiwin-Ponoka.

The recommended electoral division is roughly 25,000 square kilometers in size and is sparsely settled by a population of approximately 30,000 which is about 44% below the average provincial electoral division population. The changes we recommend would take 17,000 residents out of the current Rimbey-Rocky Mountain House-Sundre electoral division. We are therefore recommending the new electoral division of Rocky Mountain House-Sundre be one of the four electoral divisions permitted to have a population more than 25% below the average population of all the proposed electoral divisions in the province. (53,722). This also accords with a suggestion made by the 2025-2026 Commission Chairman.

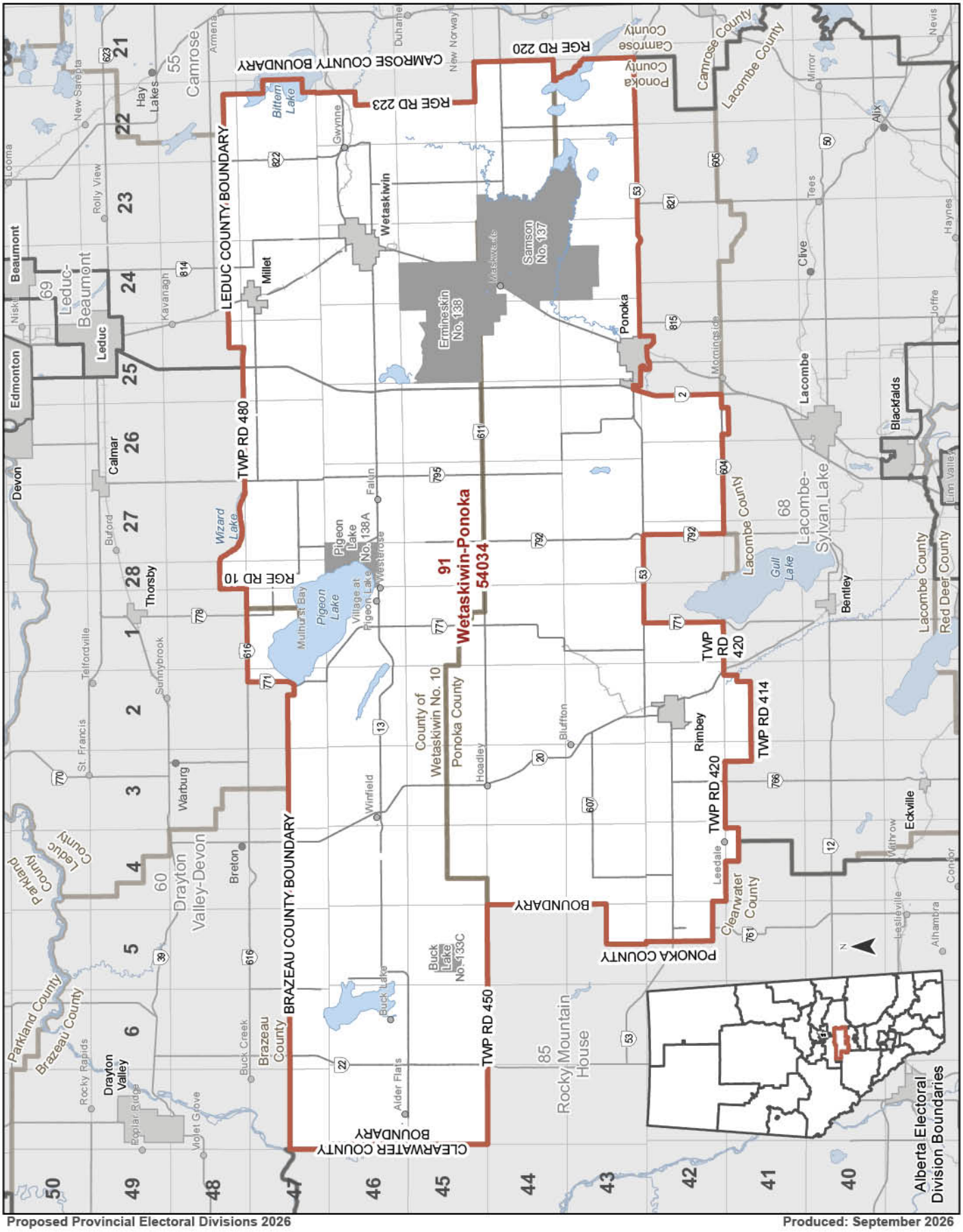
The proposed electoral division meets the criteria required by Section 15 (2) of the Electoral Boundaries Commission Act for special treatment. The area of the electoral division exceeds 20,000 square kilometres. There is no town in the proposed electoral division with a population exceeding 8,000. The proposed electoral division contains several First Nations' reserves. And its western boundary is coterminous with a provincial border (namely, the B.C. border). Only three of the Section 15 (2) criteria are required. The proposed electoral division possesses at least three of the five required criteria.

The area that we are recommending for inclusion in a restored Rocky Mountain House-Sundre electoral division has had a Rocky Mountain House electoral division of similar size, configuration and name since at least 1940 and so the *status quo* has been preserved. Preserving the *status quo* is a good thing in electoral boundary mapping, absent contrary considerations of which there are none.

There are also clearly defined communities of interest across the entire electoral division. First Nations' interests, environmental protection interests, resource extraction interests, agriculture, forestry, and recreational tourism interests. The David Thompson Highway (Highway 11) runs through the proposed Rocky Mountain-Sundre electoral division from Red Deer to the Banff-Jasper Highway at the Saskatchewan River Crossing. The David Thompson, far from dividing the electoral division, unites it.

The electoral division is geographically huge and many of its roads are forestry trunk roads and so representing some constituents is not easy. Nor is it always easy for constituents to participate in the political process and advocate for their interests. It truly deserves special treatment.

Wetaskiwin-Ponoka
Estimated Population: 54,034



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Wetaskiwin-Ponoka

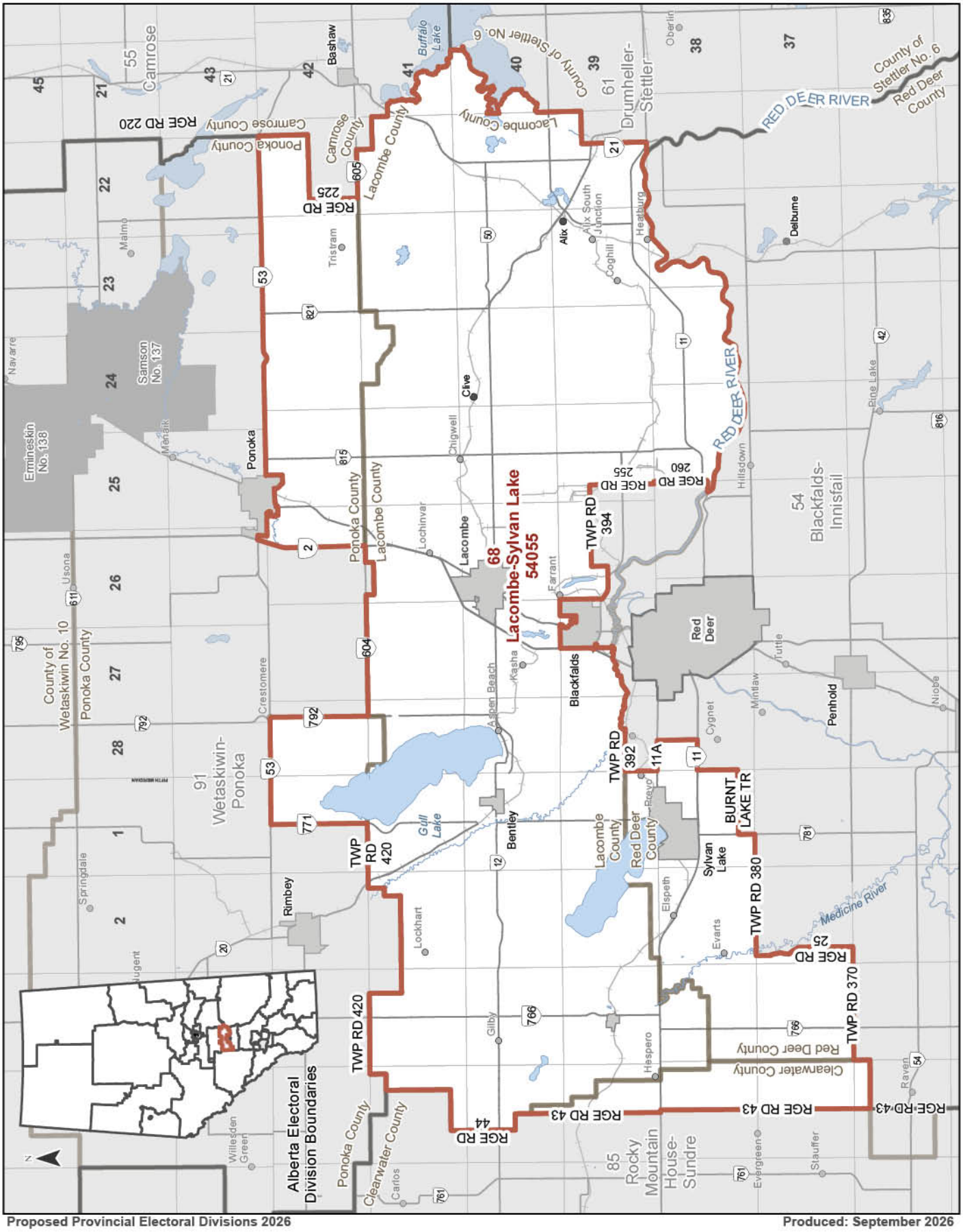
This is the most northerly Highway 2 electoral division that the restoration of a Rocky Mountain House electoral division permitted the advisory panel to rationalize (i.e. propose changes to what the 2025-2026 Electoral Boundaries Commission recommended).

The significant change here is the inclusion of Ponoka in the electoral division. Ponoka is currently in an electoral division with Lacombe. The 2025-2026 Electoral Boundaries Commission recommended moving Ponoka into this electoral division. The advisory panel concurs.

The current Maskwacis-Wetaskiwin electoral division that was mapped by the 2017 Electoral Boundaries Commission, and which was in place for the last general election, is a compact and understandable electoral division comprised of Wetaskiwin, the four First Nations at Maskwacis, as well as Millet, Pigeon Lake, Falun and Westerose. The advisory panel tried to mimic the current electoral division as best we could. However, we had to recommend extending the electoral division west to Alder Flats taking in Battle Lake, Winfield and Buck Lake. To the southwest, the panel recommends extending the electoral division to take in Rimbey. Like the Commission, the advisory panel recommends moving the northeast portion of the electoral division into the Camrose electoral division, including Kavanagh, New Sarepta and Hay Lakes.

Lacombe-Sylvan Lake

Estimated Population: 54,055



Proposed Provincial Electoral Divisions 2026 **Produced: September 2026**

Lacombe-Sylvan Lake

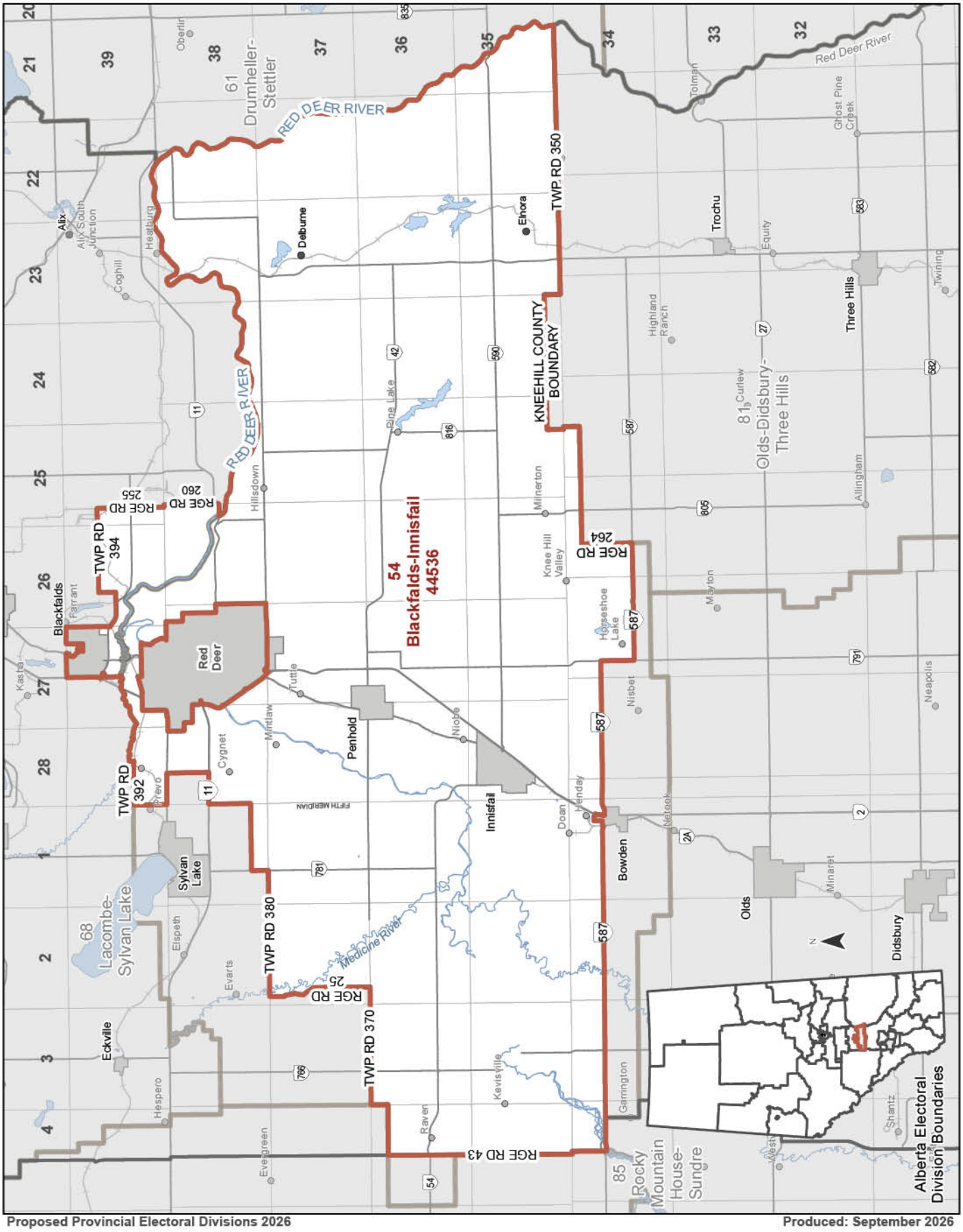
With the restoration of a Rocky Mountain House electoral division (Rocky Mountain House-Sundre), the advisory panel was able to recommend an electoral division that put Lacombe back into an electoral division focused on the Highway 2 Corridor rather than on the West Country. The recommended removal of Rocky Mountain House-Sundre had meant that Ponoka was put in a huge Clearwater County/Mountain View County electoral division. This no longer needs to happen.

The proposed electoral division would include Gull Lake and Bentley to the west and a portion of Buffalo Lake to the east as well as Sylvan Lake to the southwest.

Because the Lacombe-Sylvan Lake electoral division extends all the way to Buffalo Lake, there would have to be changes to the west end of the electoral division of Drumheller-Stettler as mapped by the 2025-2026 Electoral Boundaries Commission. The Commission had mapped the western boundary of Drumheller-Stettler extending all the way up to the town limits of Lacombe and Morningside which put a large riding east of the Red Deer River (Drumheller-Stettler) adjacent to Highway 2. That was, perhaps, unavoidable but nevertheless incongruous.

Blackfalds-Innisfail

Estimated Population: 44,536



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

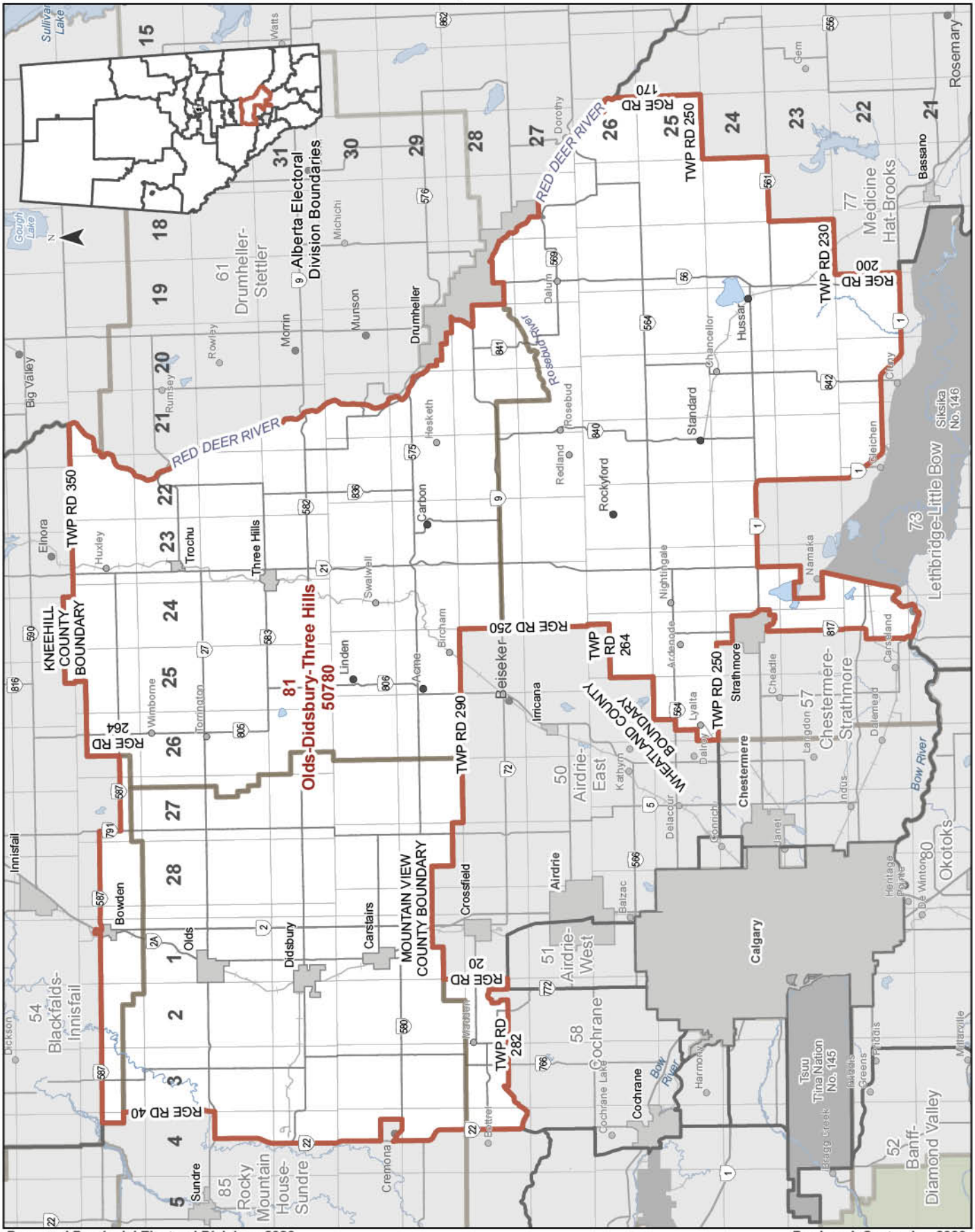
Blackfalds-Innisfail

The advisory panel's proposed Blackfalds-Innisfail electoral division is an electoral division that surrounds Red Deer on all sides. It includes Blackfalds with a population of roughly 12,000 people and Innisfail with a population of about 8,000 people. It takes in a bit of Red Deer at the north end and the Westerner Park, Red Deer's fairgrounds, hockey and rodeo arenas, racetrack and exhibition hall and several other agriculture-related service centres at the south end.

South and west of Red Deer the Blackfalds-Innisfail electoral division includes Penhold, Innisfail, Spruce View, the Dickson Dam and Gleniffer Lake. It does not include Sylvan Lake which the advisory panel recommends for the Lacombe-Sylvan Lake electoral division. Nor does it include Bowden which we recommend for Olds-Didsbury-Three Hills. South and east, it includes Delburne, Elnora and Pine Lake.

Olds-Didsbury-Three Hills

Estimated Population: 50,780



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Olds-Didsbury-Three Hills

This is the electoral division that the 2025-2026 Electoral Boundaries Commission named Mountain View-Kneehill. The current electoral division, as mapped by the 2017 Electoral Boundaries Commission, was called Olds-Didsbury-Three Hills in the last general election and in the recent 2025 by-election. The advisory panel recommends keeping the old name because it is arguably more descriptive of the electoral division.

The 2025-2026 Electoral Boundaries Commission reluctantly concluded that they had to add portions of Mountain View County that were previously in the deleted Rimbey-Rocky Mountain House-Sundre electoral division to the newly named Mountain View-Kneehill electoral division. Now that Rocky Mountain House-Sundre has been substantially restored, extending Olds-Didsbury-Three Hills out to the west of Sundre is no longer necessary.

The Commission also included the Town of Bowden in this electoral division but conceded that it could just as easily have been put in Sylvan Lake-Innisfail. Bowden is between Innisfail and Olds on Highway 2. The Commission's reason for including the Town of Bowden in Mountain View-Kneehill (Olds-Didsbury-Three Hills) was that it balanced the electoral division's population with Sylvan Lake-Innisfail (now Blackfalds-Innisfail). We accept that view and concur.

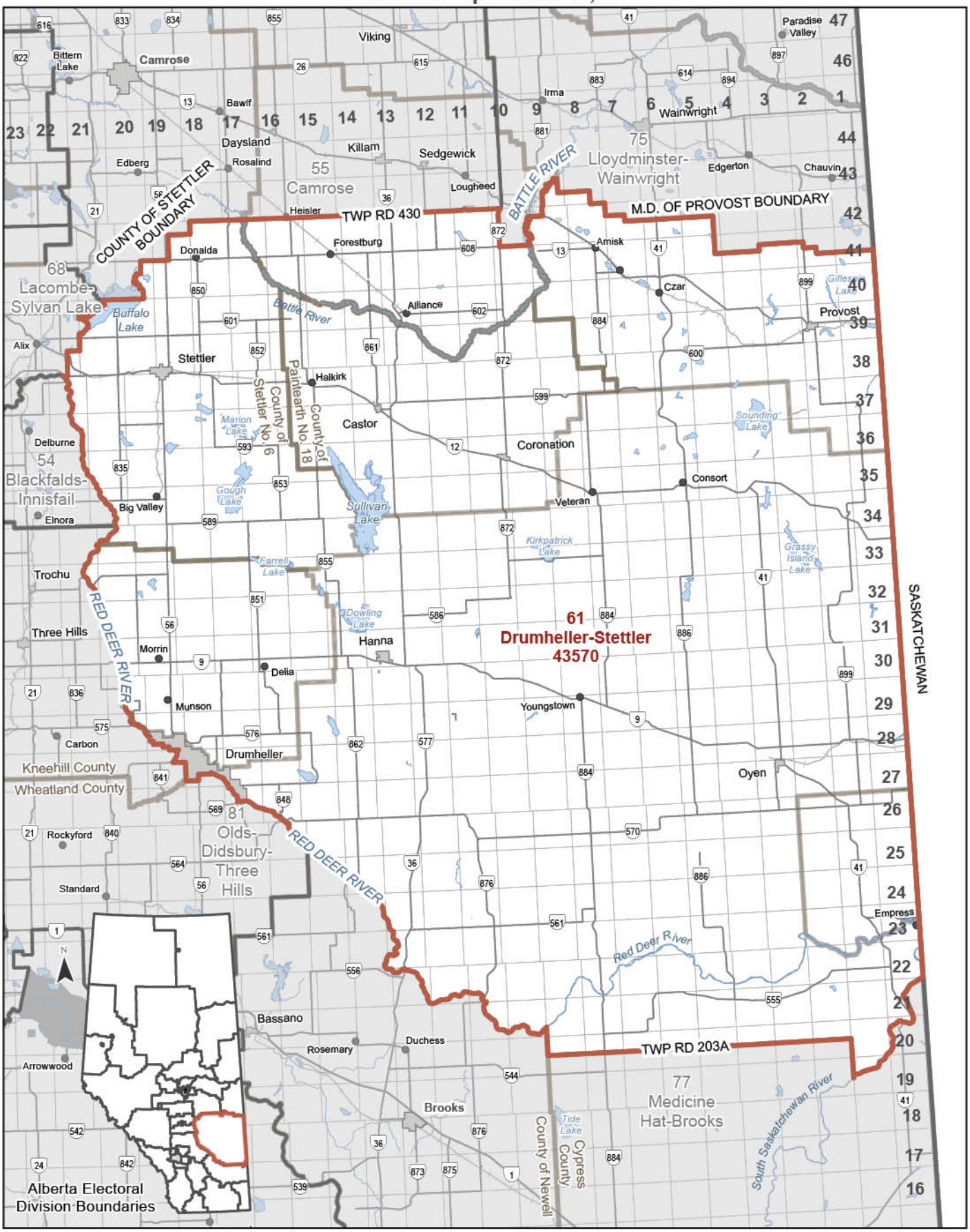
The Commission also moved Crossfield and Irricana out of the Olds-Didsbury-Three Hills electoral division to create the new Airdrie East electoral division. We concur in that recommendation as well.

The 2025-2026 Electoral Boundaries Commission also recommended moving parts of the extreme southeast of the Olds-Didsbury-Three Hills electoral division into the High River-Vulcan-Siksika electoral division they recommended, including Rockyford, Rosebud, Standard and Hussar. The advisory panel found itself recommending the opposite. The panel is recommending that Rockyford, Rosebud, Standard and Hussar be included in Olds-Didsbury-Three Hills in order to prevent Little Bow, a new electoral division recommended by the panel, from becoming too large. This proposal is not unlike what the

2017 Electoral Boundaries Commission proposed to keep Cardston-Siksika from becoming too large. The panel recommends that the southeast boundary of Olds-Didsbury-Three Hills extend south to the Siksika First Nations Reserve where it will adjoin the recommended Little Bow electoral division in a manner similar to the way the current Olds-Didsbury-Three Hills electoral division adjoins Cardston-Siksika. The recommended Little Bow electoral division is explained later in this report.

Drumheller-Stettler

Estimated Population: 43,570



Proposed Provincial Electoral Divisions 2026 **Produced: September 2026**

Drumheller-Stettler

The restoration of the Rocky Mountain House-Sundre electoral division gave the advisory panel the opportunity to reconfigure the Highway 2 corridor electoral divisions. As a consequence, a portion of the Drumheller-Stettler electoral division west of Buffalo Lake, which the 2025-2026 Electoral Boundaries Commission recommended adding to the electoral division, no longer needs to be added. The portion recommended to be added would have brought Drumheller-Stettler's northwest boundary right up to Highway 2 and the eastern borders of Blackfalds, Lacombe and Morningside. The advisory panel is now in a position to recommend that the northwestern boundary run north-south just east of Stettler through Nevis to Buffalo Lake.

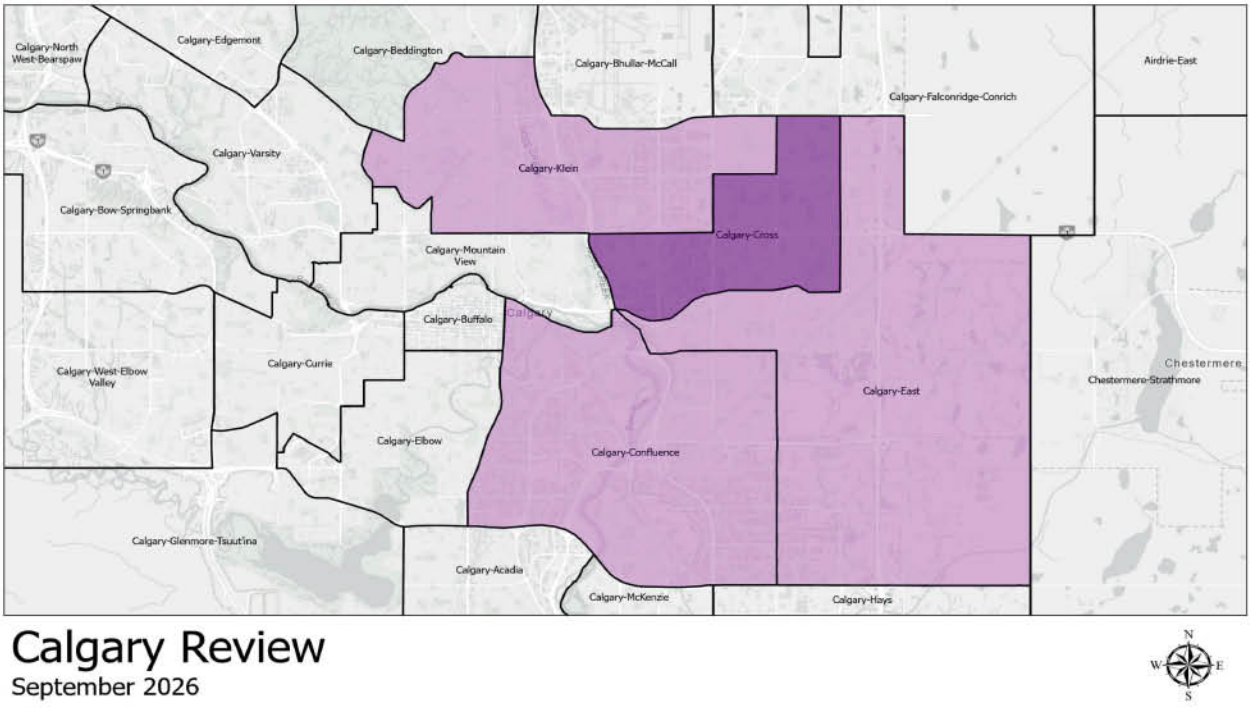
Drumheller-Stettler is a huge electoral division, with the Red Deer River as its western boundary and the Saskatchewan border as its eastern boundary. Its northern boundary follows roads to the Saskatchewan border northeast of Provost. It contains Stettler at its northwest end, Provost at its northeast end, Drumheller on its west boundary and Empress (near Medicine Hat) in its extreme southeast. It contains Stettler, Castor, Coronation, Consort, Hanna, Special Areas, Youngstown and Oyen and Forestburg on the Battle River in the north.

Northeast Calgary's Boundary Dilemma

A discussion paper on four durable electoral divisions in northeast Calgary and a year-ahead secretariat for the next boundary commission

Rapid population growth in northeast Calgary poses a recurring boundary-setting challenge. Moving a few neighbourhoods between divisions will not solve it; the map must accommodate growth within Alberta's fixed number of seats. Although the last Commission added divisions in northeast Calgary, several were drawn near the provincial average, leaving little capacity for growth already visible at the city's edge. Motion 37 directs the panel to consider population, density, sparsity, communities of interest and the **rate of growth**. Together, these factors support two conclusions: northeast Calgary needs a four-division solution now, and the province should establish a small, time-limited secretariat before the next Commission to develop and test scenarios before its formal work begins.

The boundary dilemma



Northeast Calgary, September 2026. The dilemma is how to preserve coherent city divisions while accommodating growth on the northeast edge.

How the dilemma arose

Alberta had 87 electoral divisions in 2017; the 2025–2026 Commission mapped 89. In northeast Calgary, the two additional seats became Calgary-Nose Creek and Calgary-Confluence, while Calgary-Falconridge was extended beyond city limits toward Conrich. However, the remaining inner northeast divisions were drawn near the provincial average even as rapid growth continued in Homestead, Belvedere, Twinhills, Huxley, Janet and other edge communities.

The Legislature then requested a 91-seat review. Motion 37 requires population to be weighed alongside sparsity, density, communities of interest and the **rate of growth**. A map may be balanced when drawn yet fail quickly if it leaves no room for known growth. Northeast Calgary therefore needs a solution that is lawful now and resilient over time.

The principle for solving it

The practical approach is to keep compact urban cores modestly above the provincial average and use the statutory population band where growth demands flexibility. Calgary-Klein, Calgary-Cross and Calgary-Confluence can remain coherent urban divisions bounded by recognizable features such as Deerfoot Trail, 16 Avenue, the Trans-Canada Highway and the Bow River. Calgary-East is the logical growth-management division because it lies on the city's edge and can absorb developing communities without fragmenting stable inner neighbourhoods. Historical boundaries and future growth scenarios should also guide the map so each new Commission does not have to redraw the area from scratch.

Treating the four northeast Calgary divisions as a single system keeps major communities together, respects the permitted population range and gives the map room to absorb near-term growth.

Electoral division	Populations	Variance from Average
Calgary-Cross	61,800	+15%
Calgary-Klein	62,300	+16%
Calgary-East	58,300	+9%
Calgary-Confluence	51,000	-5%

Working counts. Plus 25 percent is about 67,150. Minus 25 percent is about 40,290.

The proposed four-division solution

Calgary-Klein, about 62,300. This should be the airport-adjacent urban division. Deerfoot Trail and 16 Avenue provide clear boundaries, creating a stable seat that the next Commission can assess without starting over.

Calgary-Cross, about 61,800. Whitehorn, Temple, Rundle, Pineridge and Monterey Park form a recognizable community cluster. They should remain together rather than be split eastward simply to approach the numerical average.

Calgary-East, about 58,300. This should be the growth-management division. Janet, Starfield, Applewood, Huxley, Twinhills and Belvedere fit an urban-edge Calgary seat; they should not be joined to Chestermere or used to disrupt Conrich or established inner northeast communities.

Calgary-Confluence, about 51,000. This division should remain a stabilizing part of the plan. The Bow River provides a defensible organizing boundary, while the outer boundary helps neighbouring divisions stay compact and accommodate expected growth.

Some historical context

Northeast Calgary's "Properties" communities—Whitehorn, Temple, Rundle and Pineridge—were developed in the mid-to-late 1970s north of the Trans-Canada Highway and east of 36 Street NE. They share a development history, urban form, roads, commercial areas, schools and services.

Together, these neighbourhoods form a coherent electoral community. Keeping them together supports community-of-interest principles and avoids dividing a recognizable part of northeast Calgary without a clear boundary rationale.

Monterey Park developed later but is a natural extension of the Properties because of its location and housing pattern. For electoral purposes, it belongs within the same northeast Calgary community system.

The 2010 Commission kept Whitehorn, Temple, Rundle and Pineridge together. It shifted the western boundary from 36 Street to Deerfoot Trail, adding commercial lands, but did not cross the Trans-Canada Highway to the south.

The 2017 Commission split the cluster: Whitehorn and Temple went to Calgary-Falconridge, while Rundle and Pineridge remained in Calgary-Cross with Monterey Park. Calgary-Cross also crossed the Trans-Canada Highway to include Marlborough and Marlborough Park. The issue now is whether those two communities should remain in Calgary-Cross or return to a more east-oriented division.

The 2026 Commission's interim map reunited the four Properties neighbourhoods in Calgary-Cross, included southern Monterey Park and extended east through Rocky View County toward Chestermere. The final report moved much of the Rocky View territory north of the Trans-Canada Highway to Calgary-Falconridge and added northern Monterey Park to Calgary-Cross. This sequence underscores the need for a clearer framework: keep stable communities together, manage edge growth deliberately and use rural or exurban additions only when they serve a coherent boundary purpose.

Why a pre-Commission secretariat is needed

The northeast Calgary challenge reached the panel late because no standing process tested growth scenarios before the Commission began. A small working secretariat could address that gap without displacing the Commission. It would assemble evidence, identify pressure points, develop transparent map scenarios and show where the statutory population band, growth data and communities of interest create genuine choices.

The secretariat should be time-limited and accountable. Beginning one year before the next boundary commission, it would provide the Speaker with population estimates, municipal growth plans, prior boundary decisions, community-of-interest notes and alternative maps. At minimum, it should prepare five scenarios: a *status quo* baseline, a strict-average map, a growth-weighted map, a frozen-core map protecting stable urban communities and an "after-next" map showing likely pressure one cycle later.

Its purpose would be to ensure the next Commission begins with tested options rather than discovering growth dilemmas under deadline pressure.

For northeast Calgary, this process would have identified early that drawing every new division near the average left too little capacity for known growth. It could also have presented the four-division map as a tested option rather than a late-stage repair. The model would improve deliberation without limiting the future Commission's judgment.

Recommended discussion position

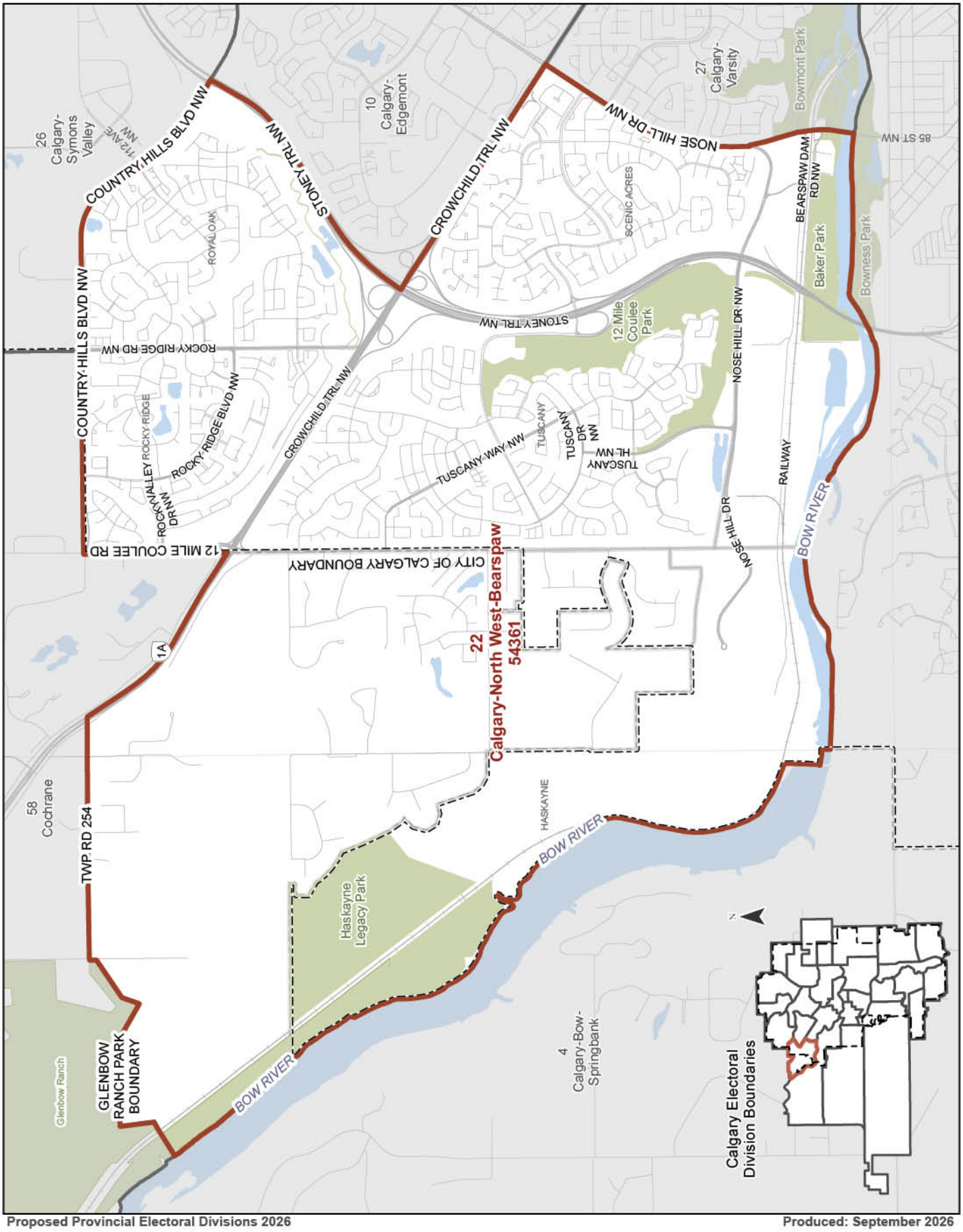
The panel should recommend the four-division northeast Calgary plan: Calgary-Klein at about 62,300, Calgary-Cross at about 61,800, Calgary-East at about 58,300 and Calgary-Confluence at about 51,000. It should also recommend a pre-Commission secretariat for the next cycle to prepare neutral growth and community-of-interest scenarios before the Commission begins its work.

Darwin Durnie
Member of the Independent Advisory Panel,

Hon. Monte Solberg P.C.
Member of the Independent Advisory Panel

Calgary-North West-Bearspaw

Estimated Population: 54,361



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-North West-Bearspaw

Calgary-North West is an electoral division bordering Calgary's city limits in northwest Calgary. It was not changed by the 2025-2026 Electoral Boundaries Commission despite submissions requesting that the western boundary of the electoral division be moved westward to include the adjacent Rocky View County communities of Bearspaw Village, Watermark and Church Ranches which the submitters contended were functionally integrated with City of Calgary communities to the east through schools, sports, churches, markets and shopping, and with the relationships running in both directions.

The 2025-2026 Electoral Boundaries Commission gave "serious consideration" to moving "Bearspaw" into the Calgary-North West electoral division, Bearspaw being an ill-defined area northeast of Calgary anchored by Highway 1A. The independent advisory panel infers from the foregoing that that the proposed amalgamation merits consideration which the panel has now given it. Once again, this is not gerrymandering by the panel; it was and is a proposal that was considered to have merit by both the 2025-2026 Electoral Boundaries Commission and the advisory panel.

The electoral division as recommended by both the 2010 and the 2017 Electoral Boundaries Commissions and which the 2025-2026 Electoral boundaries Commission declined to alter includes the Calgary communities of Royal Oak and Rocky Ridge north of Crowchild Trail N.W. and Scenic Acres and Tuscany south of Crowchild Trail S.W.

Significantly, the electoral division already crosses 12-Mile Coulee Road at its south end to include portions of communities known as Bearspaw Meadows and Rockland Park which is very much an urban subdivision. And the reason is that the City limits themselves cross 12-Mile Coulee Road in a "fish hook" shape to incorporate two Bearspaw communities. And so the electoral division recommended by not only the 2025-2026 Electoral Boundaries Commission, but also by the 2017 Electoral Boundaries Commission and the 2010 Electoral Boundaries Commission did in fact cross 12-Mile Coulee Road at the south end to take in the two Bearspaw communities, both adjacent to the Bearspaw Reservoir on the Bow River.

The reason the boundaries of the City of Calgary cross 12-Mile Coulee Road near the Bow River, we suspect, is to give the City control of its largest fresh water reservoir created by the Bearspaw Dam on the Bow River.

If the 2025-2026 Electoral Boundaries Commission had dug a little deeper, they would have been aware of the fact that the electoral boundaries west of Tuscany did not stop at Tuscany or the 12-Mile Coulee Road. The electoral boundaries had already jumped 12-Mile Coulee Road at its south end to incorporate two Bearspaw communities: Bearspaw Meadows and Rockland Park.

Although the Calgary Bow electoral division included Bearspaw Meadows and Rockland Park, it did not include immediately adjacent communities to the north, namely Watermark and Bearspaw Village, Bearspaw Pointe, Blueridge Mountain or Blueridge Estates. These Rocky View Country subdivisions are all south of Crowchild Trail N.W. (the four-lane divided Highway 1A to Cochrane). These communities either abut Calgary or are situated very close to it.

The 2025-2026 Electoral boundaries Commission's reason for declining to move Bearspaw into the electoral division was simply that they saw no compelling reason to and therefore elected to maintain the *status quo*. However, in the Commission's Final Report, there was no apparent consideration of the relative strengths of the ties these residents might have to northwest Calgary versus Cochrane. Clearly the ties to Calgary are greater. And conversely, clearly the ties of northwest Calgarians in northwest to Bearspaw and the recreational areas nearby are strong. Two busy golf courses, riding arenas, Haskayne Legacy Park and the Glenbow Ranch Provincial Park are places where thousands of Calgary residents recreate on a regular basis, to say nothing of farmers' markets along Highway 1A where Calgarians shop for fresh produce.

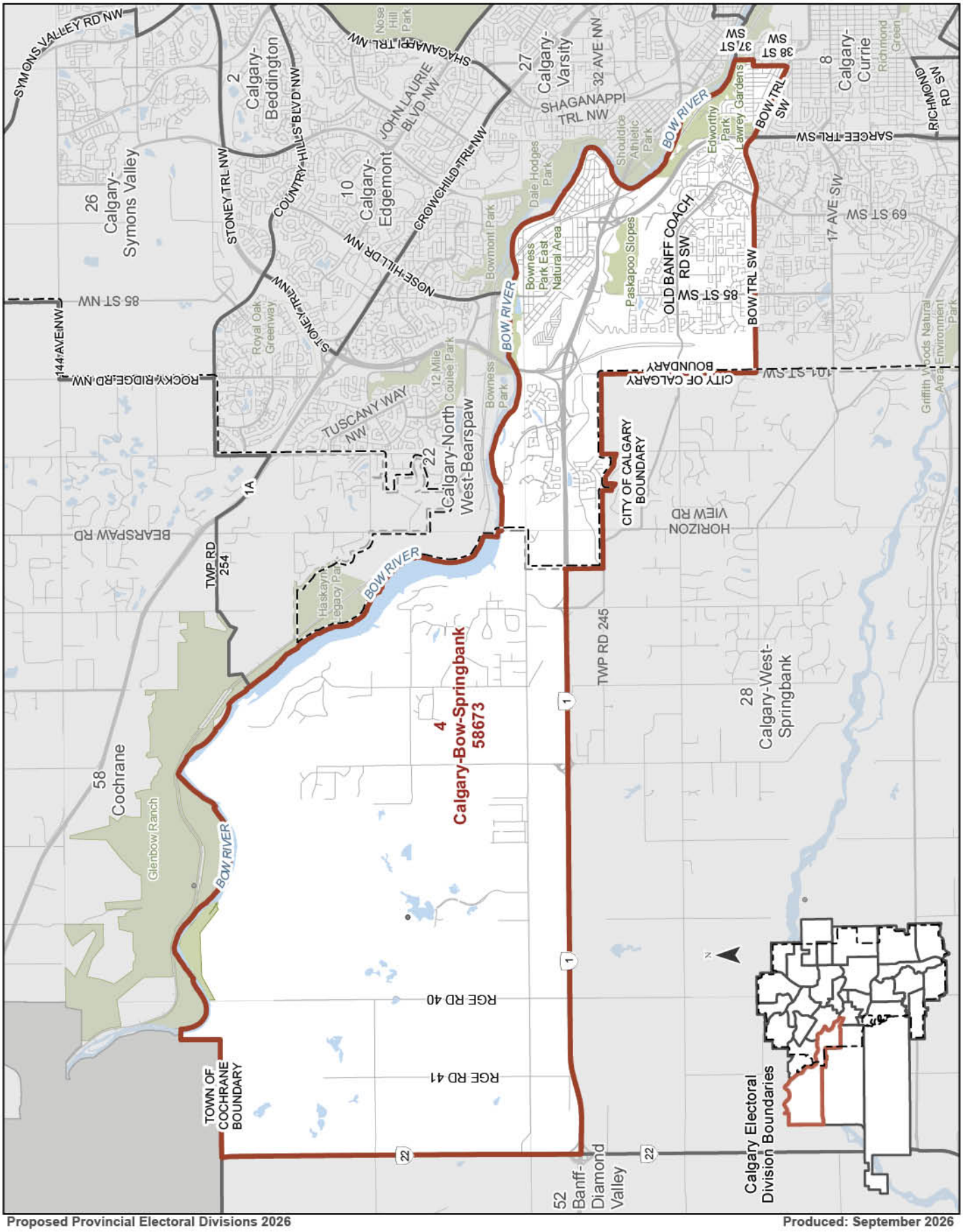
The case for moving Church Ranches and several other Bearspaw neighborhoods north of Highway 1A into a Calgary riding is, arguably, as strong as that for moving the neighborhoods south of the Highway 1A into Calgary Bow. But it is not as clear cut. Issues arise as one moves north of Highway 1A.

Church Ranches is admittedly right across 12-Mile Coulee Road from the Calgary Bow community of Rocky Ridge but there are a handful of other Bearspaw subdivisions north of the highway which are also either adjacent to Rocky Ridge or adjacent to Church Ranches. The issue these communities present is where do you stop? One might go all the way west to Lochend Road (Highway 766) which could serve as a natural electoral boundary, but how far north of Church Ranches do you go to possibly take in Rolling Acres, Biggar Meadows, Biggar Heights and Woodland Estates?

The advisory panel would have preferred more input than its process permitted to be comfortable adding Church Ranches to the Calgary Bow electoral division. But it is certainly something for the Legislature, or a future electoral boundaries commission, to consider.

As a result, the independent advisory panel is only recommending the inclusion of the Bearspaw subdivisions south of Highway 1A. But there is definitely a case to be made for also including Church Ranches.

Calgary-Bow-Springbank
Estimated Population: 58,673



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Bow-Springbank

One of the more difficult decisions the advisory panel had to make was what to recommend with respect to Springbank. It is currently (2017) part of the Banff-Kananaskis electoral division which makes no sense. The 2025-2026 Electoral Boundaries Commission proposed that it be put in a Cochrane electoral division which made more sense. The advisory panel proposes that Springbank be paired with either Calgary-Bow or Calgary-West depending on what side of the TransCanada Highway its residents live. The connection between Springbank and Cochrane is clearly not as strong as it once was and certainly not as strong as Springbank's connection to Calgary.

We were not all agreed, but the majority proposes that the Legislature consider putting North Springbank in the Calgary-Bow electoral division and South Springbank into the Calgary-West electoral division. North Springbank being that portion of Springbank north of the TransCanada Highway and South Springbank being that portion south of the TransCanada Highway.

The 2025-2026 Electoral Boundaries Commission clearly considered recommending this in their review of the Calgary-Bow electoral division. And, as indicated, minority members of the 2025-2026 Electoral Boundaries Commission actually did recommend that the Calgary-Bow electoral division be extended west to include Springbank. But, in its Final Report, the majority members stated that they chose not to include Springbank in this electoral division because it would make the population too large. The advisory panel respectfully disagrees. Including Springbank in the electoral division results in a population of roughly 9% above the average electoral division's population for all 91 of the Province's electoral divisions. That is well within the permitted variances.

Submissions to the 2025-2026 Electoral Boundaries Commission pointed to the indisputable fact that substantial portions of Springbank are occupied by residents in suburban or acreage communities which have been closely connected to Calgary for decades.

The Chair of the 2025-2026 Electoral Boundaries Commission, in his Addendum to the Majority Report, stated that he did not consider what he referred to as the "hybridization" of Springbank with Calgary "necessarily unreasonable or procedurally unfair given the extensive submissions about them". The Chairman went on to state that, but for what he characterized as the minority's unreasonable insistence on other hybrids and their "radical about face and substantive unreasonableness", he might well have agreed with the minority including Springbank in a Calgary electoral division.

All of this is simply to indicate that including Springbank in Calgary Bow is worthy of consideration by an advisory panel which has been directed to review the Province's electoral divisions. It is not, as has been alleged, unconstitutional gerrymandering, nor is it clearly outside the advisory panel's mandate. Indeed, it was prompted by the Commission Chair's comments in his Addendum to the Majority Report.

But adding Springbank to Calgary Bow did present the advisory panel with other problems it had to deal with.

First, it is argued that adding Springbank to Calgary Bow may have implications for voter outcomes. All electoral boundary changes have the potential to affect voter outcomes. Adding Springbank to Calgary Bow is said to potentially favour the party in power. But whether that potential will manifest itself in the next election, not even the pollsters with their voter transpositioning software know for sure.

Second, there is the issue of defining with precision what geographical area should be added. Springbank, as Calgarians generally understand it, consists of a number of suburban and acreage subdivisions west of Calgary on both sides of the TransCanada Highway.

For the purposes of the advisory panel's recommendations, Springbank is defined on the west by the north-south Highway 22 connecting Bragg Creek to Cochrane. Its northern boundary is the Bow River. Its southern boundary is Highway 8. And its eastern boundary is the City of Calgary.

North of the TransCanada Highway, Springbank contains not only a number of suburban and acreage subdivisions, but also the Springbank Airport, two golf courses, riding arenas, various light industrial developments and a special school for promising young athletes from the City of Calgary and elsewhere.

South of the TransCanada Highway, there are also suburban and acreage subdivisions, Calaway Park (an amusement park), a regional hockey rink, riding academies and at least four golf courses.

Significantly, on both sides of the TransCanada Highway, Springbank still contains a number of working farms and ranches. Those farmers and ranchers might be more connected to Cochrane than Calgary, but they are a shrinking minority.

Finally, removing Springbank north of the TransCanada Highway from the Cochrane electoral division reduces the population of the Cochrane electoral division from roughly 6% below average to almost 13% below average. But it gives the City of Cochrane a representative in the Legislature in the same way that similar-sized cities such as Okotoks, Airdrie and Spruce Grove will have dedicated representation in the Legislature if the advisory panel's proposals are approved.

That description of Springbank above makes it apparent that all of Springbank cannot be conjoined with any single Calgary electoral division without major changes to the electoral map of Calgary. But if Springbank is conceptually separated by the TransCanada, there are Calgary electoral divisions to which the two halves of Springbank might be logically amalgamated.

The minority argue that dividing Springbank raises issues of community-splitting, although the TransCanada Highway is a fairly substantial natural boundary. The Highway 22 crossing of the TransCanada, the Calaway Park/Springbank Airport crossing and the Old Banff Coach Road crossings are the only connectors between North Springbank and South Springbank unless you're herding cattle underneath the TransCanada via a livestock tunnel which the builders of the TransCanada Highway provided. While there may be one or two old farming/ranching families with relatives on both sides of the TransCanada Highway, the connection between residents North Springbank and Calgary is as strong as their connection to their neighbours across the Highway. That said, it is true that the Springbank school south of the Highway is attended by students who live north of the Highway. The criticism that the advisory panel's proposal would extend the Calgary-Bow electoral riding 30 km from Calgary's western border is disingenuous. The Calgary-West-Elbow Valley electoral division the Commission recommend extended just as far. Those 30 km are cycled daily by scores of Calgarians in less than an hour and are driven in about six minutes.

Another consideration in increasing the size of Calgary Bow to take in North Springbank is that some residents of North Springbank, although not the majority, might identify more with Cochrane than Calgary. That's a valid criticism but only for a handful of farming and ranching families.

Currently, both North and South Springbank are mapped in the Banff-Kananaskis electoral division set by the 2017 Electoral Boundaries Commission. That was deemed unsatisfactory by the 2025-2026 Electoral Boundaries Commission. The advisory panel agrees. The Commission put both North and South Springbank in an electoral division with Cochrane, although significantly the Commission did not put an important part of Springbank south of the Elbow River into the Cochrane electoral division. Instead, the Commission attached it to Calgary West. An expanded Calgary West-Elbow Valley was recommended by the Commission and it extended all the way west to Highway 22.

In other words, the precedent for attaching portions of these Springbank suburban/acreage areas west of Calgary to a Calgary electoral division has already been set. We deal with Calgary-West Elbow Valley later in this report; but suffice to say that although it is a strange-looking electoral division as the 2025-2026 Electoral Boundaries Commission mapped it, the people of Elbow Valley, living as they do in planned suburban subdivisions, commute to Calgary for just about all of their needs and their employment. Conversely, residents of Calgary pour into Elbow Valley daily to get their golf fixes at one of the 18, 27 and 45-hole golf courses along Highway 8. And Calgary parents send their children to schools and riding academies there on a daily basis. Shared communities of interests run both ways.

The 2025-2026 Electoral Boundaries Commission considered but chose not to include Springbank in Calgary Bow because the Commission said it would make the population of the electoral division too large. The information we were provided estimates the population of Calgary-Bow-Springbank at about 58,673 or 9% above the average population of all the electoral divisions in Alberta (53,722), well within the variance permitted by Section 15 (1) of the Electoral Boundaries Commission Act.

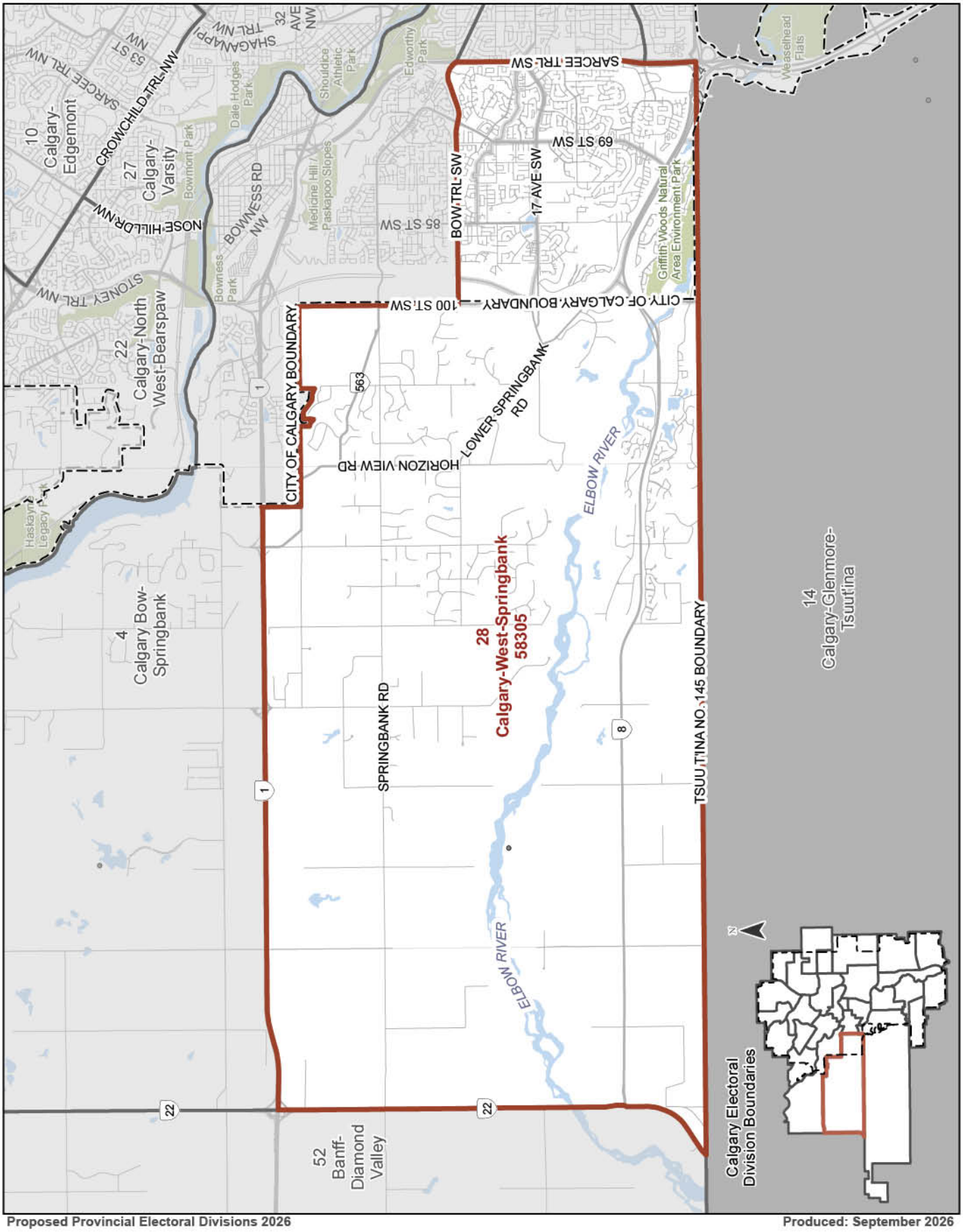
It is also important to note that despite the Commission's usage of the word "hybrid" and "hybridization", a Calgary Bow-Springbank electoral division, if approved, would not be a hybrid riding. True hybrids mix people with fundamentally different interests. Hybrid ridings mix urban and rural (agrarian) residents in electoral divisions. The proposed electoral division does little of that. It is simply an electoral division which straddles or extends beyond the city limits into a high growth area where urban-like development has long since taken place. It mixes urban with urban residents. It does not mix much rural with urban.

Communities of interest are shaped by transportation corridors, employment, shared services, shared recreation facilities, golf courses, bike routes, soccer pitches, shared schools, etc. Municipal boundaries in and of themselves have little to do with communities of interest in circumstances like those existing in west Calgary and Springbank.

And as far as effective representation is concerned, the advisory panel is of the view that the communities proposed to be conjoined for representation purposes are not fundamentally different, nor are their interests conflicting or competing.

In conclusion, the majority of the advisory panel recommends that the Legislature consider mapping North Springbank into the Calgary-Bow electoral division and naming it Calgary-Bow-Springbank.

Calgary-West-Springbank
Estimated Population: 58,305



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-West-Springbank

The issue here is whether or not the remainder of Springbank South, or that portion of Springbank which lies south of the TransCanada Highway and north of the Elbow River, should become part of an electoral division comprised of Calgary West and South Springbank.

In the last general election, Calgary West was a relatively compact and understandable electoral division between Sarcee Trail and the City limits or 101St Street S.W. It was bordered on the north by Bow Trail and on the south by a City of Calgary boundary. It included the Calgary communities of Strathcona, Christie Park, Signature Parke, Signal Hill and Richmond Hill along Sarcee Trail and Aspen Woods, Elbow View, Springbank Hill and Discovery Ridge to the west. The electoral division of Banff-Kananaskis, stretching all the way from the B.C. Border to the City of Calgary, abutted Calgary-West. Clearly the inclusion of Springbank in a Banff-Kananaskis electoral division was less than ideal.

One change the 2025-2026 Electoral Boundaries Commission recommended to address that situation was to put some, but not all, of Springbank into an electoral division with Cochrane. That was an improvement, but arguably, not optimal.

Evidence for that can be found in what the Commission recommended. The Commission recommended putting an elongated east-west stretch of land south of the Elbow River straddling Highway 8 into Calgary-West and called it Calgary-West-Elbow Valley. The Commission's Elbow Valley straddled Highway 8 (the highway to Bragg Creek) all the way to Highway 22 (the highway between Bragg Creek and Cochrane). The electoral division's southern border was the Tsuut'ina Nation's Reserve west of Calgary which the Commission recommended be included in another Calgary electoral division, namely Calgary Glenmore. The Commission called Calgary-West-Elbow Valley a hybrid electoral division which they characterized as the "way of the future".

Whether Calgary-West-Elbow Valley was a true hybrid or not, it certainly is a way of the future. Some would argue it was an idea long since recognized. In any event, it was yet another precedent for extending the boundaries of a suburban electoral division beyond the boundaries of the city to encompass suburban communities beyond those boundaries. As we have stated elsewhere, this was not a hybridization of rural and urban populations. The electoral division does not mix or combine people of fundamentally different interests. It is simply an electoral division which straddles a municipal boundary, uniting for electoral purposes only, suburban residents of the City with suburban residents of Rockyview County.

We concur in what the 2025-2026 Electoral Boundaries Commission in extending Calgary-West into Rocky View County along Highway 8 and its reasons therefor. It is the independent advisory panel's view that those reasons apply equally to the rest of South Springbank. And so, the panel recommends that the entire area loosely referred to as South Springbank be amalgamated with Calgary-West for electoral boundary purposes. The electoral division we propose would have a much more regular polygon shape with straight line boundaries, as opposed to the long, narrow, meandering salamander shape of Calgary-West-Elbow Valley recommended by the Commission.

The minority members of the panel criticize the splitting of Springbank north and south of the TransCanada Highway. The splitting of Springbank along the Elbow River was worse.

Like Springbank north of the TransCanada Highway, substantial portions of Springbank south of the highway are occupied by residents in urban or suburban or acreage communities which have been closely connected to the city for decades.

As noted earlier, the Chairman of the 2025-2026 Electoral Boundaries Commission in his Addendum to the Majority Report stated that he did not consider what he referred to as the "hybridization" of Springbank with Calgary as being "necessarily unreasonable or procedurally unfair given the extensive submission about them". He went on to state that, but for what he characterized as the minority's unreasonable insistence on

other hybrids and their "radical about face and substantive unreasonableness", he might well have agreed with the minority including Springbank in a Calgary electoral division.

So it was a proposal that the 2025-2026 Electoral Boundaries Commission might have considered recommending, given the Chairman's comments.

All of this simply to indicate that including South Springbank in the Calgary-West electoral division is worthy of consideration by an advisory panel which has been mandated to review the province's electoral divisions. It is not, as been insinuated, unconstitutional gerrymandering. Given the Commission Chairman's comments in his Addendum to the Majority Report and the description of the advisory panel's mandate in Government Motion 37, it is clearly within the panel's mandate to review and make proposals with respect to this electoral division.

To suggest, as two of our panel members have, that adding Springbank to Calgary-West and Calgary-Bow subtly dilutes Calgarian's votes assumes there is no commonality of interest between a resident of Aspen Gardens and a resident of Springbank. One's vote is only diluted if a large number of people with whom one doesn't share the same interests is added to his or her electoral division. The argument of the minority assumes there is no commonality of interest between Calgary-West and Calgary-Bow and Springbank. Yet the Commission assumed there was a commonality of interest when it put Elbow Valley in the Calgary-West electoral division. Besides, the number of people proposed to be added to the electoral division is not great compared to the number of people in the former Calgary-West constituency.

As previously indicated in our review of Calgary-Bow-Springbank, the Springbank area south of the TransCanada Highway is very much a community which Calgarians visit, recreate in, etc.; and Calgary is very much a community Springbank relies on for services, employment, education, healthcare, etc.

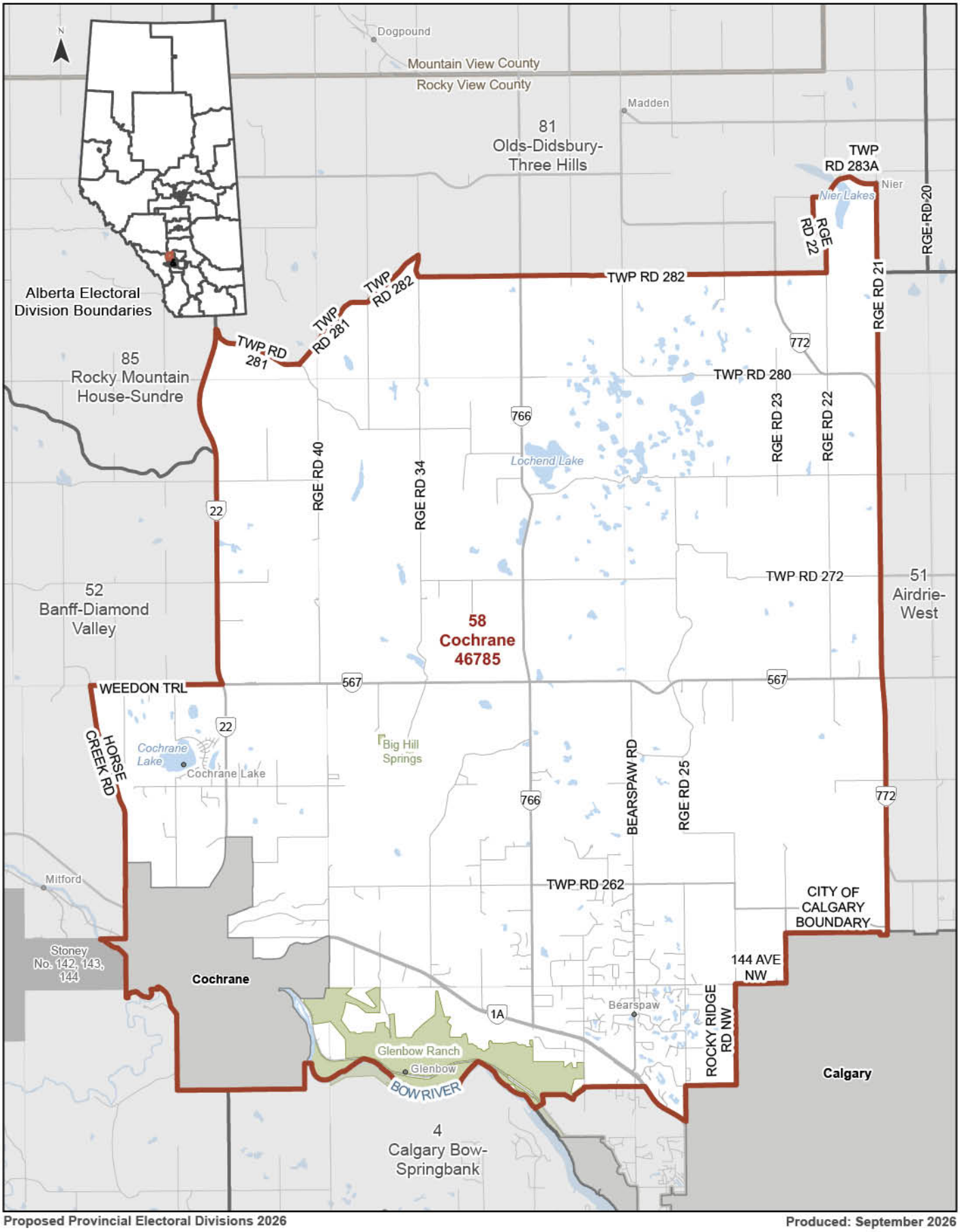
Support for the assertion that South Springbank is very much a Calgary community can be found in the fact that there are two 18-hole golf courses, one 27-hole golf course and one 45-hole golf course located in South Springbank. The 45-hole course is affiliated with an athletic club which is located in the City's core. Its members go from the downtown club to the Springbank golf course on a daily basis as do hundreds of others to other golf courses in Springbank. Calaway Park is an amusement park that attracts thousands of Calgarians into Springbank daily. And because there are almost no commercial services in South Springbank, residents there must commute into Calgary for their daily needs. And, of course, most residents are employed at jobs in Calgary.

South Springbank is also the location chosen by the Province for its $850-million Springbank off-stream dry storage reservoir built to protect communities in the City of Calgary from flooding. And some, but not all, Springbank residents are on the City's water system. It is evident that shared communities of interest go both ways.

In conclusion, the advisory panel proposes that the Legislature consider approving the Calgary-West-Springbank electoral division as the panel has proposed it, rather than put South Springbank in a Cochrane electoral division.

Cochrane

Estimated Population: 46,785



Proposed Provincial Electoral Divisions 2026 **Produced: September 2026**

Cochrane

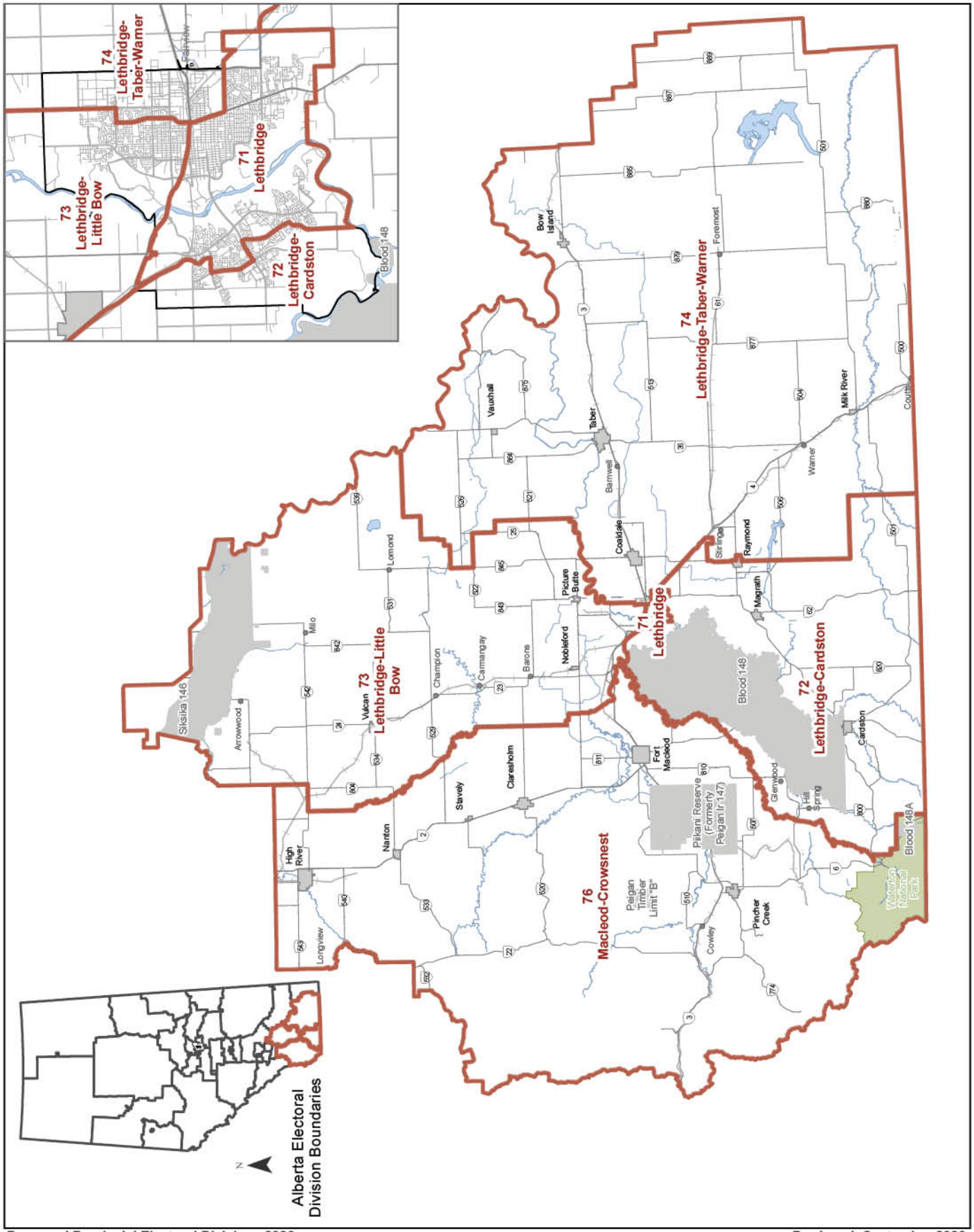
In 2017, the 2016-2017 Electoral Boundaries Commission recommended taking Cochrane out of a Banff-Cochrane electoral division and putting it in an electoral division with west Airdrie to give Cochrane a voice undiluted by the concerns of Alberta's mountain park communities.

The 2025-2026 Electoral Boundaries Commission recommended removing West Airdrie and a portion of Rocky View County and putting Cochrane into an electoral division with Springbank south of Cochrane.

What the 2025-2026 Electoral Boundaries Commission did made sense, but the advisory panel believes that Springbank's connection to Calgary is even stronger than its connection to Cochrane. This is, the advisory panel is of the view that what makes more sense is to put Springbank in electoral divisions in Calgary on the premise that the connection of most people in Springbank to the people in Calgary is much stronger than their connection to Cochrane (see elsewhere in this report the explanations for recommending that Springbank be put in electoral divisions in Calgary).

Taking Springbank out of Cochrane, of course, removed a significant amount of population from the Cochrane electoral division. However the way the advisory panel has mapped the Cochrane electoral division, it still has about 48,000 people in it or about 11% below average. And the advisory panel's recommendation has the benefit of giving Cochrane its own elected representative. Furthermore, Cochrane is expected to grow rapidly so that any deviation from the average may be short-lived.

Southern Alberta Electoral Divisions



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

The Case for Regional Representation in Southern Alberta

The advisory panel's recommendations for southern Alberta are driven by two recognized electoral boundary-making considerations. The first is communities of interest: Southern Alberta is uniquely united economically around the agricultural and food processing industries which transcend the boundaries of the City of Lethbridge. The second consideration is population, the guiding principle or standard of reference in defining the geographic areas of electoral divisions.

Guided by these two considerations, the advisory panel recommends a distinct Lethbridge electoral division. It also recommends organizing the surrounding regions around three coherent hybrid electoral divisions, borrowing population from the perimeters of the City of Lethbridge to achieve relative population parity and to reflect shared community interests. Southern Alberta is united economically around the agricultural and food processing industry which transcend the City of Lethbridge boundaries. The advisory panel recommends the following:

1. A re-established Lethbridge-Little Bow electoral division including a portion of northeast Lethbridge and a bit of west Lethbridge to give the electoral division necessary population.
2. A re-established Lethbridge-Taber-Warner electoral division including a portion of east Lethbridge (the agricultural fairgrounds and communities north of it) in order to provide the necessary population that the current (2017) electoral division would lose as a result of the panel recommending a separate electoral division for Cardston. Taber-Warner has been below average in population since at least the 2017 Electoral Boundaries Commission review.
3. A re-established Lethbridge-Cardston electoral division for Cardston, Raymond, and Magrath and the largest First Nations Reserve in Canada, the Kainai Blood Reserve headquartered at Stand Off. In order to give Cardston the population needed to be in a separate electoral division, the 2017 Electoral Boundaries Commission created an electoral division extending from Cardston to points north of the Bow River to the TransCanada Highway, including the Siksika Reserve. Population has been a problem for a Cardston electoral division as well. Our recommendation to solve the problem is to have Lethbridge lend a little population to Cardston.
4. A re-established Fort Macleod electoral division west of Lethbridge, Fort Macleod and Pincher Creek along Highway 3 to the Municipality of Crowsnest and north along Highway 2 to High River, taking in Claresholm, Stavely and Nanton. It would no longer surround Lethbridge if the advisory panel's proposals are approved. And Coaldale, Picture Butte and Turin are all proposed to be removed.

The actual or precise recommended boundaries have been dictated by the need to maintain each electoral division within the statutorily mandated population variances and by the panel's desire to recommend electoral divisions with similar communities of interest that follow clear and recognizable features.

Southern Alberta is currently divided into five electoral divisions, including an electoral division which runs from Cardston to the Siksika Reserve east of Calgary. The 2025-2026 Electoral Boundaries Commission in turn also divided southern Alberta into five electoral divisions, one of which was proposed to run from Claresholm to the Red Deer River. The panel is likewise proposing five electoral divisions. What is being proposed is not that much different than what has been in place since at least 2010 and what was recommended by both the 2017 and 2025-2026 Electoral Boundaries Commissions. What is different is that Lethbridge is being asked to share some of its population with adjoining electoral divisions in order to ensure that they can remain primarily southern Alberta constituencies. That is, the reason the panel recommends these changes is to achieve better regional representation of the people of southern Alberta.

With the exception of Lethbridge, with a population of well over 100,000 people and growing, Southern Alberta is a huge and a relatively sparsely-settled part of the Province. It has presented challenges to every electoral boundaries commission that has reviewed it. The challenge is that communities in and around Lethbridge (Cardston, Taber, Warner and the Little Bow district north of Lethbridge) have insufficient

populations to justify their own electoral divisions which at least the last three electoral commissions have considered they deserved.

Lethbridge already has population to spare. And if it grows any more, its population will have to be shared with electoral divisions outside of Lethbridge because it will have too much population for two electoral divisions and not enough population for three electoral divisions. Lethbridge is almost at that point right now. A similar but smaller problem in Medicine Hat led to the creation of Brooks-Medicine Hat and Cypress-Medicine Hat.

Lethbridge is not an isolated urban municipality in the midst of a void. It is southern Alberta's principal service, education, health, justice, transportation and agri-food centre. Its government-funded institutions, its hospitals, its courts and its universities, are built for a regional population far beyond the city's boundaries. The Highway 3, 4 and 23 agri-food economy, irrigation network, processing plants, research institutions, logistics chains and municipal partnerships link Lethbridge directly to Coaldale, Taber, Warner, Cardston, the Little Bow country and the southwestern Foothills. The panel is recommending electoral boundaries that reflect those lived relationships rather than treat the city limits as an impermeable wall.

The proposed redistribution balances two legitimate objectives. First, Lethbridge has grown large and diverse enough to contain a distinct inner-city community of interest that warrants separate representation and its own electoral division. Second, residents elsewhere in the city and in surrounding rural communities share services, employment, infrastructure and economic interests that are best represented through measured urban–rural electoral divisions. This is not hybridization for an improper purpose. It is a model grounded in the desire to achieve effective representation.

The proposed reconfiguration is neither extreme nor unprecedented. There are numerous examples throughout the Province where population, geography, community history, community interests, transportation and practical representation have justified departures from purely municipal or urban-rural lines. Lethbridge serves a regional population much larger than its municipal population. Chinook Regional Hospital provides specialized acute, cancer, intensive, neonatal and ambulatory services for all of southwestern Alberta. The University of Lethbridge and Lethbridge Polytechnic draw students and support research from across the south. Courts, provincial offices, entertainment facilities, professional services, retail and transportation infrastructure were expressly intended to serve surrounding municipalities and the Blood Tribe. For many rural residents, Lethbridge is their city in every practical sense. Lethbridge is not there solely for its resident population. It is also there for the people of southern Alberta.

The economic evidence is equally strong. Canada's Premier Food Corridor is a formal regional partnership extending along Highway 3 and linking the City of Lethbridge, Lethbridge County, Coaldale, Taber and the Municipal District of Taber and related communities. It exists because the agri-food supply chain already functions regionally: irrigation, primary production, research, food processing, labour, finance, rail and highway logistics are mutually dependent. A municipal boundary model isolates Lethbridge from these communities of interest and obscures the very relationships which section 14 of the Electoral Boundaries Commission Act requires the Committee to consider.

The minority completely loses credibility when it argues a lack of a clear and obvious shared community of interest in Lethbridge and southern Alberta. The assertion that agriculture is the sixth largest employer "by industry classification" begs the question what "industries" employ more. No reference or explanation is given for the assertion. It may be that government or even health care services are bigger employers. It may be that educational institutions, schools, universities, technical training institutes employ more people. It may even be that retail, commercial and hospitality services employ more people. But these employers and their employees are only needed if there is a population creating wealth and the need for their services.

Agriculture and agriculture-related industries account for nearly 20% of GDP in the Lethbridge region. Roughly 4,000 people in Lethbridge alone work directly for local food processing plants. And that is only a portion of the sector. Farmers and ranchers and farm workers are typically self-employed and perhaps are not counted as an "industry classification" employee.

Irrigation districts in southern Alberta cover areas as large as an electoral division and tie their members and operators together from Waterton to Medicine Hat. Agricultural research facilities, both federal and provincial, create far-reaching communities of interest in improving productivity.

Those who suggest there is no unique, shared southern Alberta community of interest that is agriculturally driven do not understand Lethbridge's role in the region. Those in Lethbridge who oppose hybrids may not have had experience with them and are understandably apprehensive about what appears to be a radical and unprecedented change. The proposed hybrids are neither to be feared, nor are they unprecedented or radical.

The mapping of southern Alberta that the advisory panel proposes is not unprecedented. Alberta already relies extensively on hybrid electoral divisions. All but two of Alberta's 19 incorporated cities have hybrid electoral divisions associated with them. Eight of Alberta's 19 cities are parts of large rural-urban electoral divisions. Nine of Alberta's largest cities, including Calgary and Edmonton, have electoral divisions that extend beyond boundaries. Only two cities in the Province do not have electoral divisions which extend beyond their boundaries. Those two cities are Lethbridge and Red Deer and even Red Deer was once hybridized and will likely have to be hybridized again in the future.

Significantly, the 2025-2026 Electoral Boundaries Commission's Final Report did not oppose hybrids. In fact, it increased the use of hybrids, including around major cities. The relevant question is therefore not whether hybrids are permissible or desirable, but whether a proposed hybrid reflects a genuine community of interest or is needed to achieve population-compliance. Around Lethbridge, the answer to both questions is yes.

Here is what Judge Ernest J. M. Walter, Chair of the 2009-2010 Electoral Boundaries Commission, had to say about scarcity of population. In the "Issues for Future Consideration" section of the Commission's Report, Chief Judge Walter said:

> "The Interim Report foreshadowed the type of major changes which future Commissions will need to consider and the reaction in central Alberta is indicative of the impassioned responses that can be expected.
>
> It seems likely that outlying electoral divisions may be fewer and larger in the future...
>
> The Legislative Assembly needs to seriously consider how the urban/rural perspectives will be addressed in the future. The Commission believes this is a province-wide issue that will have to be addressed."

Justice Myra Bielby, Chair of the 2016-2017 Electoral Boundaries Commission, stated

> "The majority accepts that the time has come to stop treating differences between rural and urban Albertans as a main driver in setting the boundaries of electoral divisions. All areas of the province are interdependent...."

Justice Bielby also correctly pointed out that the Electoral Boundaries Commission Act makes no reference to urban interests versus rural interests as a consideration in designing constituency boundaries. She also observed,

> "The majority has considered that many representers in the areas that currently have blended electoral divisions considered them to be working well. In particular, those from Fort McMurray and Medicine Hat were satisfied with their blended constituencies."

And, of course, the 2025-2026 Electoral Boundaries Commission devoted an entire Appendix to the issue of hybrid electoral divisions. The Commission's definition of a "hybrid" electoral division has been of assistance to the panel, although it fails to distinguish between electoral divisions that simply extend beyond the boundaries of a city into suburban subdivisions and those in which a portion or all of a city's resident population is proposed to be put in an electoral division with a significant rural or agrarian resident population.

Nevertheless, the Commission's definition and treatment of hybrid electoral divisions is instructive. The Commission defined a hybrid electoral division as one that contains at least a part of a city and a portion of a municipality or county outside the city. The definition also included rural electoral divisions that contain cities within them. The Commission also recognized that sometimes a city requires population from surrounding rural areas in order to obtain representation it could reasonably call its own. Cochrane and Okotoks are examples which immediately come to mind. Hybridization works both ways. It can help cities receive the representation they need. It can help rural electoral divisions to obtain the population they need to be relatively compact and manageable.

The 2025-2026 Commission identified principles or guidelines it used in creating hybrids. One of the situations in which the Commission proposed that hybrids should be used is where all or part of a city is blended with a surrounding population which is essentially suburban. Such hybrids became commonplace in the 1990's and early 2000's because population numbers and the need to maintain relative voter parity forced the transition to blended or hybrid ridings. To quote the Commission, "…. the need to ensure effective representation for all Albertans may necessitate at times that a hybrid be used purely to satisfy the numerical challenge (underlining added) across the province that a Commission faces." Thirty years and several electoral boundaries commissions later, only Red Deer and Lethbridge do not share population with an electoral division outside their municipal boundaries. The Commission itself recommended eight new hybrid electoral divisions bringing the total number of hybrid electoral divisions in the province to 27.

In his Addendum to the Majority Report, 2025-2026 Electoral Boundaries Commission Chairman Miller stated:

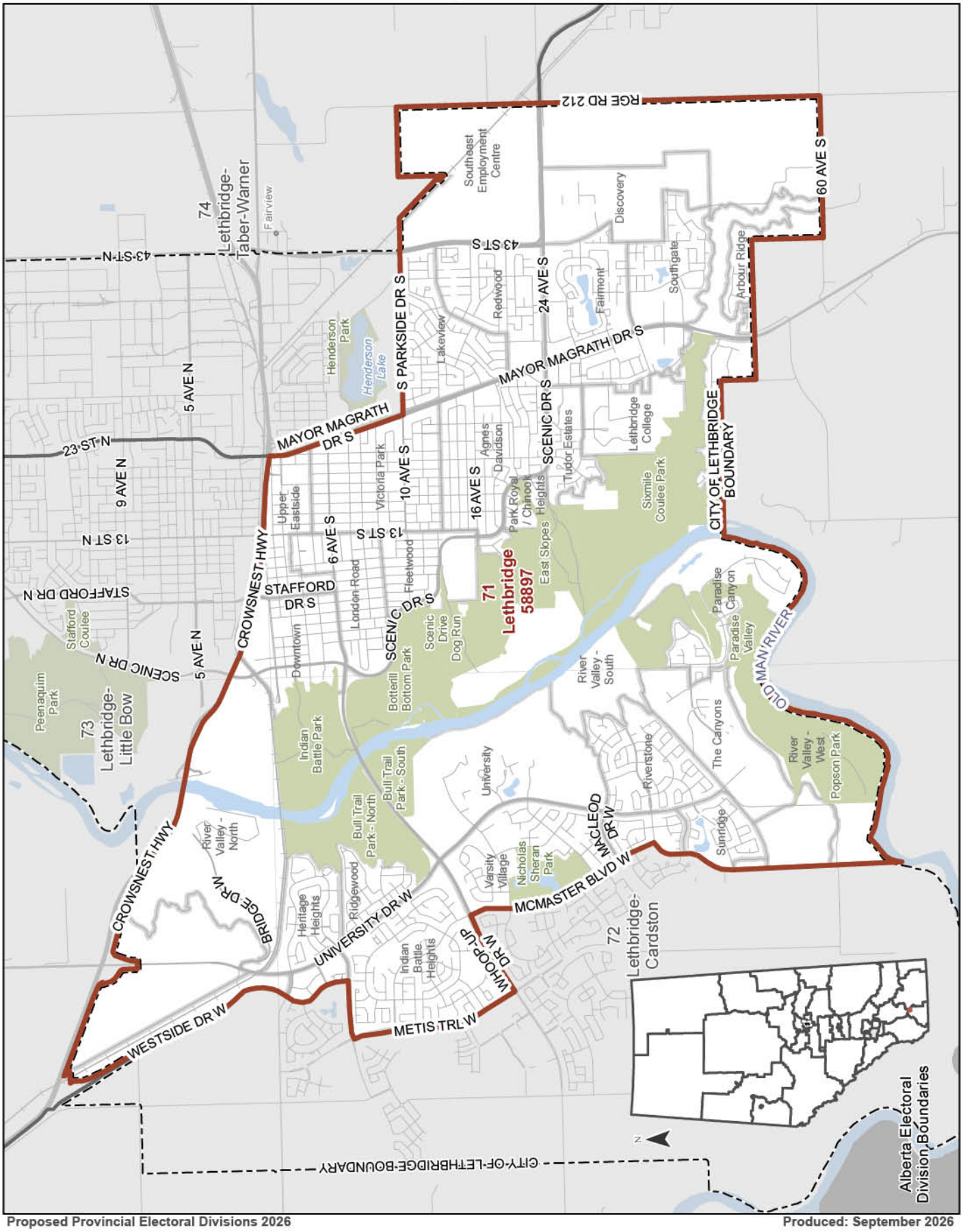
> "In addition, I wish to clarify that I do not consider all of the minority's hybrids to be unreasonable, even the ones the majority did not adopt. We did not adopt the hybridization of Bearspaw or Springbank with Calgary, nor the extent of the hybridization of Lethbridge, for reasons explained elsewhere in this report. However, I do not consider those hybrids necessarily unreasonable or procedurally unfair, given the extensive submissions about them. Indeed, had the minority chosen to advocate for them, instead of insisting upon an otherwise unreasonable and unconstitutional map, I may will have agreed with them."

In other words, it was not that the Commission's Chair opposed hybrids for Lethbridge. It was not hybrid proposals for Lethbridge which the Commission Chair thought were necessarily unreasonable or procedurally unfair. Indeed, he said he might have agreed with them. Unfortunately, having said that, the Commission was apparently not able to assess the merits of the hybrids proposed, perhaps because they were proposed at the 11th hour.

The advisory panel has now conducted such a review of the merits of borrowing population from Lethbridge to create proposed electoral divisions for southern Alberta which strive to achieve effective representation for rural residents of southern Alberta as well as for residents of the City of Lethbridge. Below we deal with the merits of the proposed Lethbridge hybrids, both their advantages and disadvantages. Having conducted that review, it is the recommendation of three of the five advisory panel members that they be seriously considered by the Legislative Assembly.

Lethbridge

Estimated Population: 58,897



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Lethbridge

The advisory panel proposes one Lethbridge electoral division that is made up solely of Lethbridge and three other hybrid electoral divisions made up of Lethbridge residents and residents of towns, villages, and rural areas of Southern Alberta.

The Lethbridge-only electoral division, if approved, would be comprised of roughly 60,000 people or roughly 60% of Lethbridge's current population.

The proposed electoral division unites the City's downtown with much of West Lethbridge and the eastern and southeastern communities of Lakeview, Redwood, Fairmont and Southgate (Prairie Arbour Estates). West of the Oldman River it is roughly comprised of Paradise Canyon, The Canyons, RiverStone, Sunridge, Varsity Village, West Lethbridge, the University of Lethbridge, West Highlands, Ridgewood and Heritage Heights.

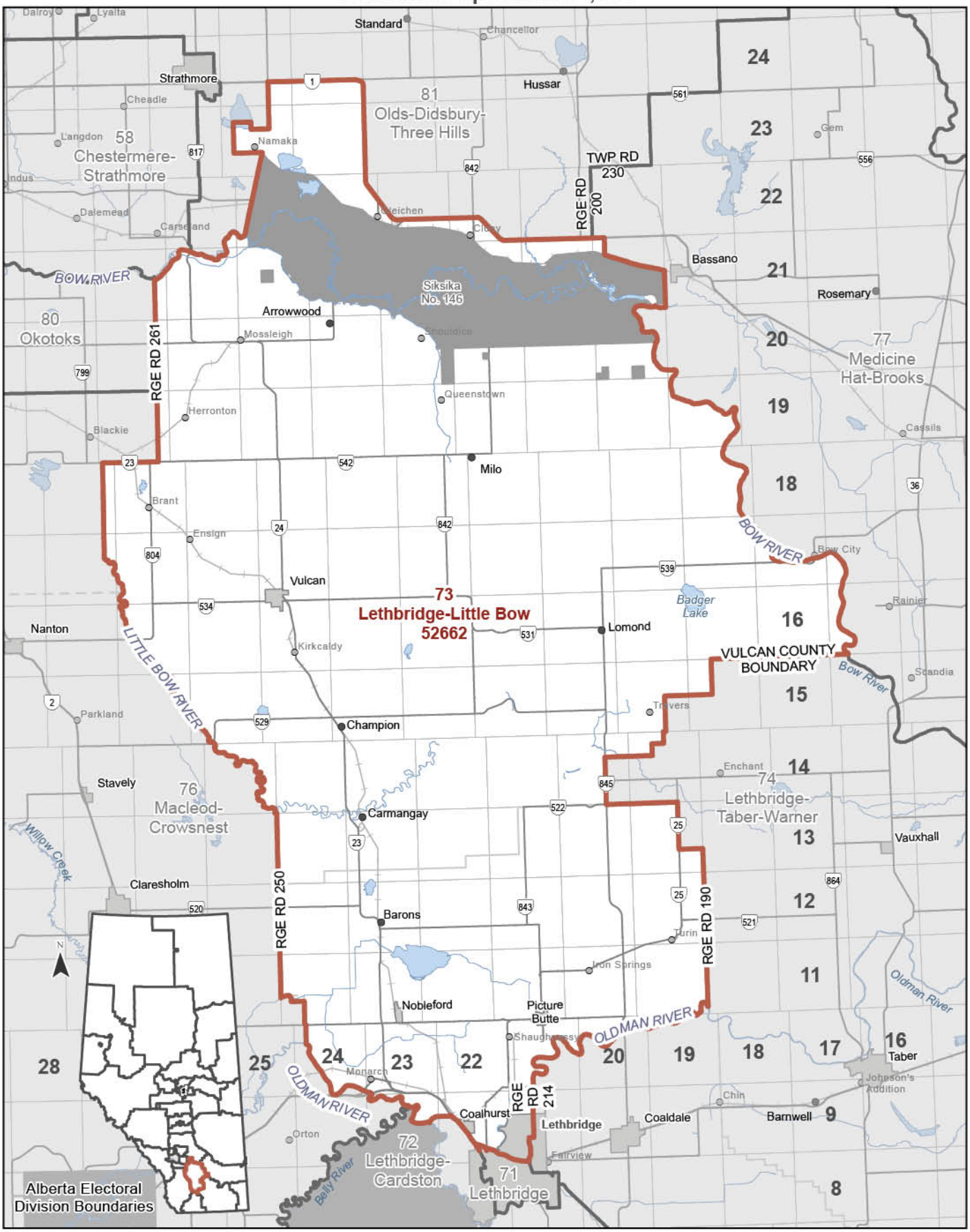
It is bounded on the south by the Oldman River in West Lethbridge and the city limits east of the river. It's bounded on the west by Metis Trail West. and on the north by Highway 3. On the eastern side the electoral boundary heads down Mayor Magrath to South Parkside Drive and then east to Highway 4, and then southeast along the railway tracks and then back up north to take in the Research and Development Centre and then south along the Lethbridge's eastern city limits.

The recommended electoral division is intended to unite parts of the West Lethbridge with the city's downtown and mature central neighborhoods. It is a distinct urban electoral division with higher density and rental housing, downtown commerce, civic and cultural institutions, social health services, transit dependencies and established (older) neighborhood concerns. A central electoral division is intended to give residents effective representation of their urban concerns while permitting outer neighborhoods to be connected for representation purposes to regional corridors to which they are functionally connected.

A more precise description of the boundaries of the proposed electoral division follows:

Commencing at a point on the south boundary of Highway 3 west of the Oldman River at Westside Drive, then south to Garry Drive and then, westerly to Metis Trail W., southerly to Whoop Up Drive then easterly to McMaster Blvd and then southerly to Mount Burke Blvd and then westerly at Rocky Mountain Blvd until Sunridge Blvd and then directly south to the left bank of the Oldman River westerly to the southern City Limit of Lethbridge to its easterly boundary, then north to South Parkside Drive westerly to Mayor Magrath Drive then northward to the southerly boundary of Highway 3 and then returning west to the point of commencement.

Lethbridge-Little Bow
Estimated Population: 52,662



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Lethbridge-Little Bow

The electoral division of Little Bow has been in existence as a provincial constituency since 1913. It has typically extended north from Lethbridge up Highways 23 and 24 capturing places like Nobleford, Barons, Carmangay, Champion, Vulcan and that connect Picture Butte with Enchant, Travers Reservoir, Lomond, Milo, Arrowwood, across the Bow River and the Siksika Reserve to Gleichen and Cluny. Significantly it also includes the Town of Coalhurst.

This electoral division gets its name from the Little Bow River into which much of the water from the Highwood River near High River is diverted south for irrigation purposes. Water from the Bow River is also diverted into this area for irrigation purposes and is managed by the Bow River Irrigation District headquartered in Vauxhall. And with the construction of the Twin Valley Dam and Reservoir, together with the Badger and Travers Reservoirs, the electoral division is very much an irrigation district.

The 2017 Electoral Boundaries Commission replaced the Little Bow electoral division with a much larger hour-glass shaped electoral division, Cardston-Siksika, that ran from Cardston and the Kainai (Blood) First Nation Reserve all the way north to the Siksika First Nation Reserve east of Calgary. A consolidation of seven existing Southern Alberta electoral divisions into six was deemed to be required by the 2016-2017 Electoral Boundaries Commission because of low population-growth in Southern Alberta. And so Cardston and the Blood Reserve were taken out of Cardston-Taber-Warner and put in a Little Bow electoral division called Cardston-Siksika.

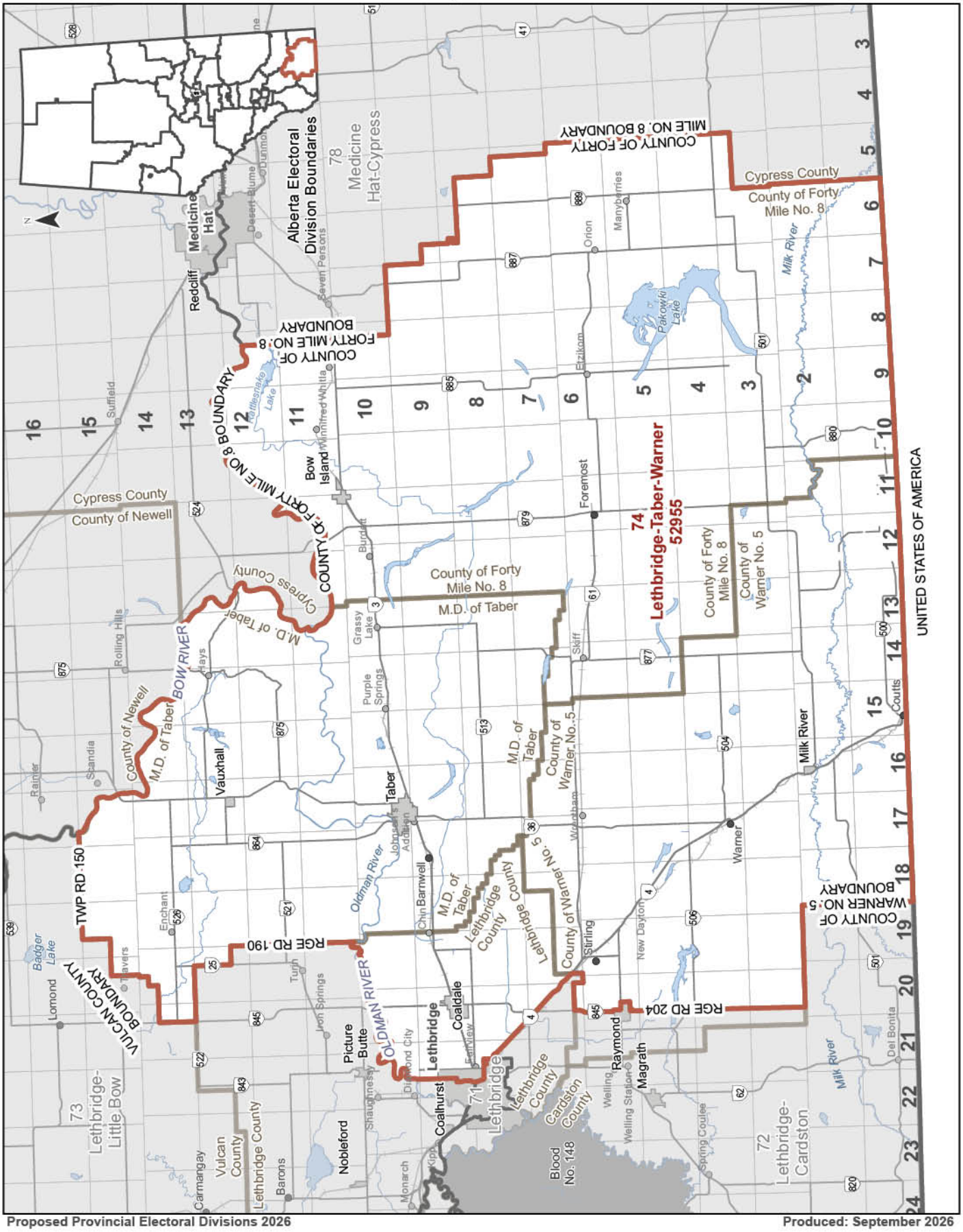
The 2025-2026 Electoral Boundaries Commission, in its review of the Cardston-Siksika electoral division acknowledged "the undesirable boundaries of Cardston-Siksika" into which Little Bow had been absorbed. The Commission's solution was to recommend an electoral division, High River-Vulcan-Siksika that absorbed much of Little Bow but also extended the electoral division all the way north to the Red Deer River. The High River-Vulcan-Siksika electoral division stretched from Claresholm to the southern boundary of the Town of Drumheller. Still not an ideal electoral division, but one with sufficient population to warrant the creation of an electoral division.

The same rural Southern Alberta population deficiency that has existed for years persists to this day. One way to solve the deficiency is create larger and larger electoral divisions which run the risk of mixing populations with different communities of interest. The other is to "borrow population" from nearby urban municipalities which share the same communities of interest as their rural (agrarian) neighbours.

Re-establishing a Little Bow electoral division would restore a historically coherent voice for communities tied by Highways 23 and 24, irrigation, intensive agriculture and the Lethbridge-area agricultural services including contiguous portions of eastern Lethbridge along Highway 3 and a contiguous portion of western Lethbridge, again along Highway 3.

The proposed electoral division therefore would provide population balance and "connects" the rural electoral division to the urban services, employment and processing capacity in Lethbridge upon which much of the Little Bow population depends.

Lethbridge-Taber-Warner
Estimated Population: 52,955



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Lethbridge-Taber-Warner

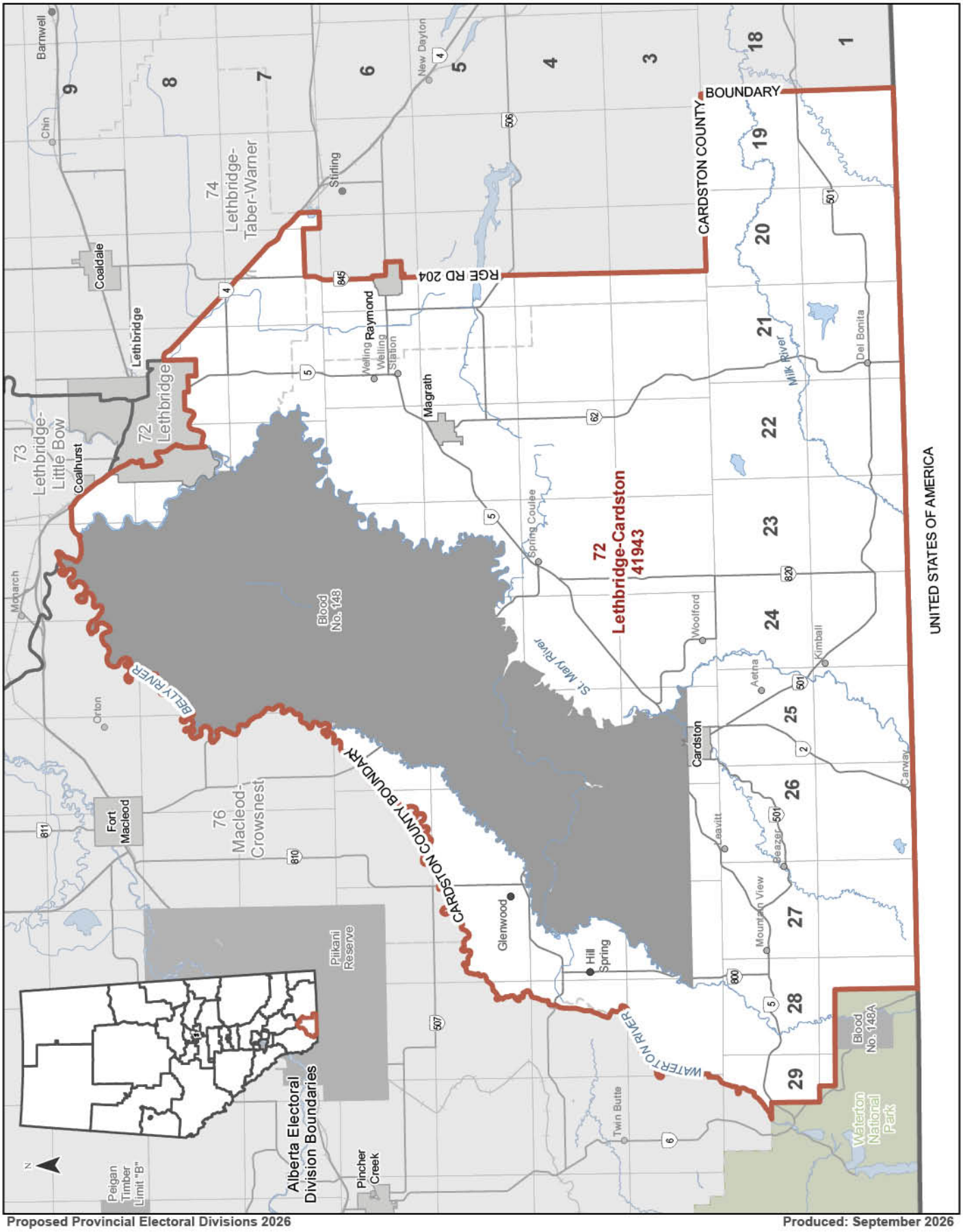
This is an electoral division which is mapped and organized around the Highway 3 and Highway 4 corridors east and south of Lethbridge. Highway 3 east to Coaldale, Taber, with a detour north to Vauxhall, and on to Bow Island. Highway 4 to the south to Warner, Milk River and the U.S. Border at Coutts is a part of the CANAMEX Corridor, a 3,700-mile/6,000 km network of highways and transportation infrastructure linking Alberta, the United States and Mexico. And east of Highway 4 at Stirling the electoral division extends just south of Lethbridge along Highway 61 to Wrentham, Foremost and Manyberries.

Including a small population from Lethbridge (6,679 people) in the electoral division provides a practical way to give this electoral division a population which meets statutory requirements and yet remains geographically manageable. It permits a southern Alberta electoral division which does not have to become so large that effective representation cannot be achieved.

This recommendation is also very much based on the community of interests which the Taber-Warner folks share with the City of Lethbridge. It is an electoral division organized around the highway corridors, irrigation and dryland farming and its produce, food processing, cross-border and shipping logistics and shared institutions most of which are located in Lethbridge. Contiguous portions of east and southeast Lethbridge would anchor the electoral division and reflect, among other relationships, the existing Premier Food Corridor relationship among Lethbridge, Coaldale and Taber. The electoral division possesses a more understandable community of shared interests than a geographically huge corridor assembled from far-flung municipalities with limited daily interaction.

See also what two members of the 2025-2026 Electoral Boundaries Commission said about what they called a Lethbridge-Taber-Warner electoral division at page 61 of their Minority Report. Their analysis was persuasive. What the minority members of the 2025-2026 Electoral Boundaries Commission recommended was not substantively unreasonable. Their recommendations did not violate the values underlying Section 3 of the *Charter*. Nor did they violate principles of procedural fairness. They were the subject of public input and Commission member's questions at a number of the Commission's hearings. There may be reasons for rejecting the recommended electoral boundaries; but those reasons should relate to their merits, their advantages and disadvantages, not to arguably inapplicable *Charter* or other legal principles.

Lethbridge-Cardston
Estimated Population: 41,943



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Lethbridge-Cardston

Cardston is currently in an electoral division that runs from Waterton Lakes National Park to the Siksika Nation and Gleichen east of Calgary. It is called Cardston-Siksika and is a large hourglass shaped electoral division running from the U.S. border to the TransCanada Highway east of Calgary. It was driven by the 2017 Electoral Boundaries Commission's "consolidation of seven existing (2010) electoral divisions into six because of the lower rates of population growth experienced... in southeastern Alberta."

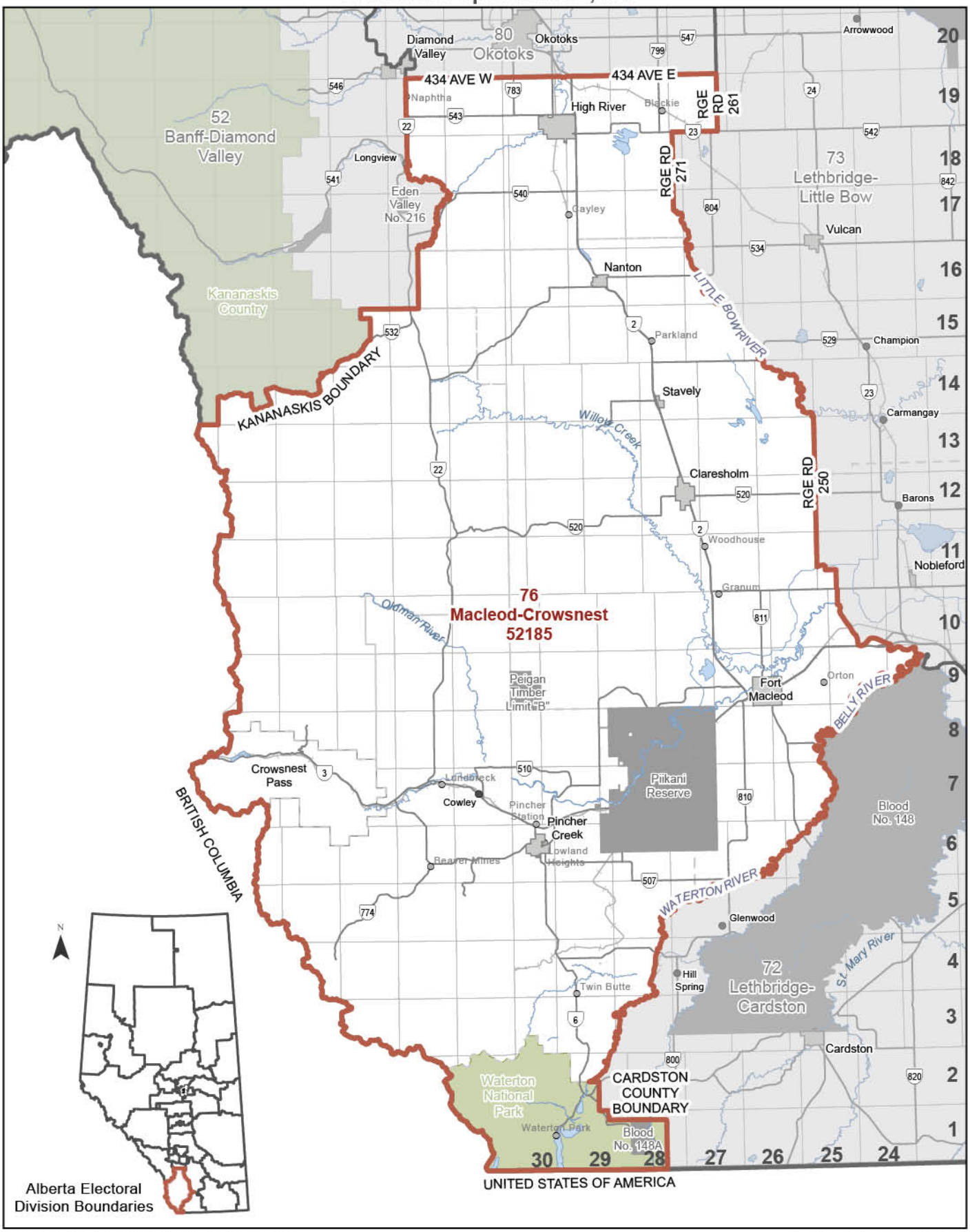
The 2025-2026 Electoral Boundaries Commission recommended what it characterized as "significant changes" to the boundaries of Taber-Warner and Cardston-Siksika also to reflect changes in the distribution of the population of Southern Alberta. What is being alluded to is that while Lethbridge is growing rapidly, the surrounding areas are not. The Commission's solution to the lower growth rates outside of Lethbridge was to recommend a previous electoral division configuration which combined Cardston with Taber and Warner, including Bow Island and Foremost. Certainly not a bad fix, but whether that configuration can withstand the Province's population increases for any length of time may be questionable.

Another solution to this population disparity problem is the creation of a Cardston, Magrath, Raymond, and Blood Reserve electoral division that borrows population from the City of Lethbridge (roughly 17,000 people). Lethbridge is already almost too large to be limited to only two representatives in the Legislature. The advisory panel's recommendation might better withstand the test of time and future population increases than the perfectly understandable recommendation of the Commission.

Borrowing population to create electoral divisions of a manageable size is legitimate electoral mapping. There are precedents for it throughout Alberta. In fact, it's the rule, rather than the exception for dozens of electoral divisions bordering or encompassing the Province's small towns and cities. There are only two cities outside of Edmonton and Calgary that are not already sharing population with or encompassed by rural populations.

But, to optimize effective representation, there must also be recognizable communities of interests in these hybrid ridings. Perhaps nowhere else in Alberta is there a clearer shared community of interests than in Southern Alberta around Lethbridge. There are lots of other agricultural communities of interest in Alberta but those which exist around Lethbridge are arguably more impactful on the day to day lives of the people both inside and outside of Lethbridge than they are elsewhere. It may also be a more inward-focused community of interests because of the distance between Southern Alberta and the Government in Edmonton. As evidence of that, at one point, the panel even considered making Cardston a special electoral division under Section 15(2) of the Act. The point is that a solution needs to be found. The Commission recognized that and so does the advisory panel. The advisory panel simply recommends a different solution and that the Legislature seriously consider it.

Macleod-Crowsnest
Estimated Population: 52,185



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Macleod-Crowsnest

Macleod-Crowsnest remains a huge electoral division west of Lethbridge. It runs from Fort Macleod west to the Crowsnest Pass along Highway 3, including Pincher Creek and Waterton Lakes National Park. From Fort Macleod north to High River up Highway 2, including Granum, Claresholm, Stavely, Nanton and Blackie. And north from Lundbreck up Highway 22 to the Chain Lakes Provincial Park and the south boundary of Kananaskis Country. It includes the Piikani First Nation Reserve at Brocket. It is bounded on the south end west by the U.S. and B.C. borders respectively. It is bounded on the east by the Waterton, Belly and Little Bow Rivers. The electoral division's east boundary heads southeast from Monarch along the Belly and Waterton Rivers on the west side of the Blood Reserve.

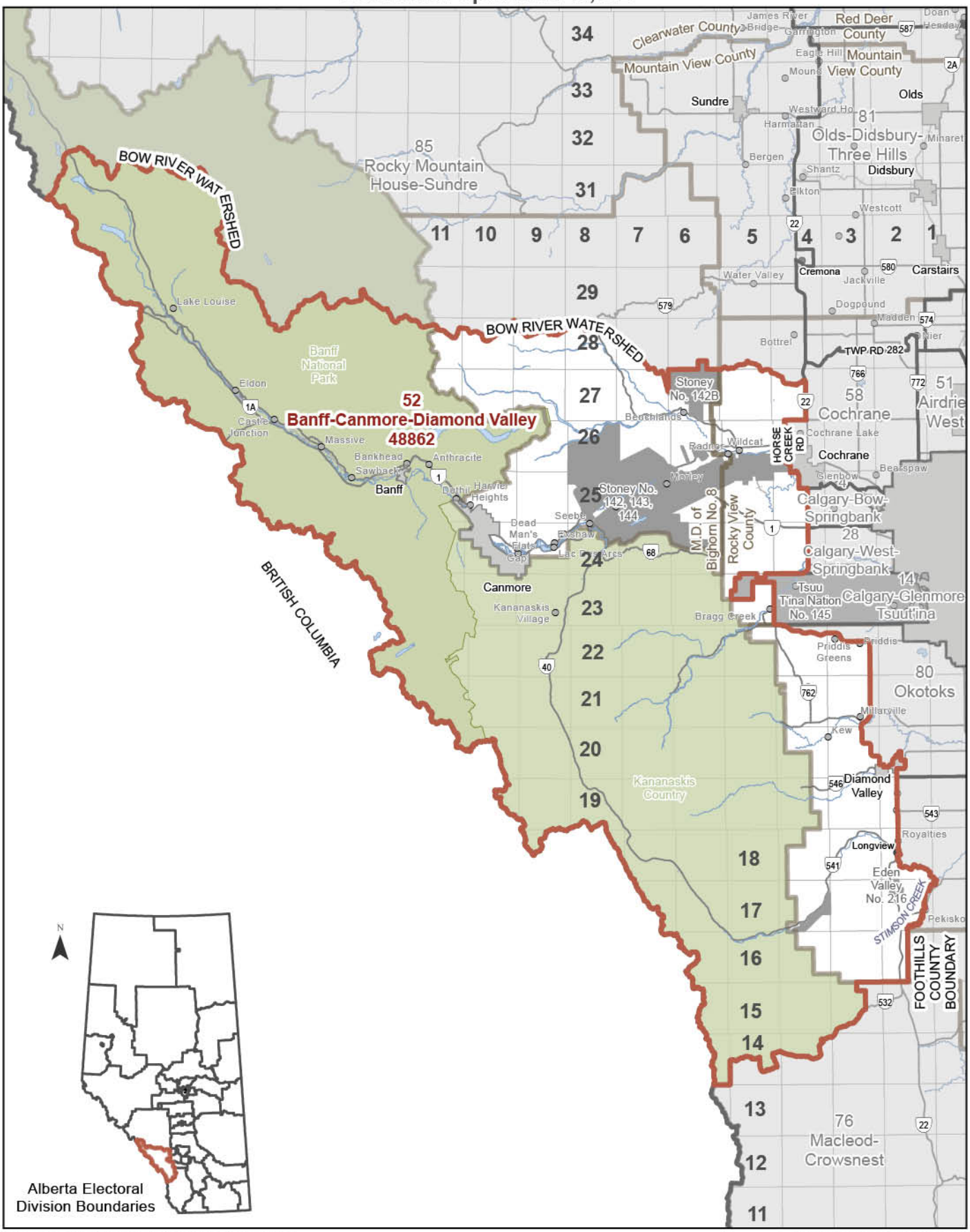
It looks a lot like the current (2017) Livingstone-Macleod electoral division. The 2025-2026 Electoral Boundaries Commission proposed to change it substantially, making it a more east-west than a north-south electoral division. The Commission mapped its northern boundary south of Claresholm along Highway 520 and along the north boundary of Lethbridge County. But in order to draw down the electoral division's north boundary, the Commission had to push its eastern boundary further east to take in Coaldale, Picture Butte, Turin such that the Livingston-Macleod electoral division the Commission recommended would have surrounded the City of Lethbridge on three sides, taking in Coalhurst and Coaldale and territory to the east and southeast.

The configuration the advisory panel proposes is admittedly driven by its Lethbridge and Little Bow recommendations north of Lethbridge and by its Taber-Warner recommendations east of Lethbridge. But in the advisory panel's view the proposed electoral division is preferable to that recommended by the 2025-2026 Electoral Boundaries Commission. It preserves the *status quo* and avoids the incongruous encirclement of the City of Lethbridge that the Commission's recommendation entailed.

It is not the most desirable electoral division in the Province because of its size and shape. However, it has always been thus and the people living in it understand it. Many also understand the reason for its size is to capture the required population.

Those living in the electoral division share primarily agricultural-related communities of interest, although those living next to Livingstone Range on the west have serious mining and resource extraction concerns. Many of the resource extraction activities in the area were once strictly governed by the Government's Eastern Slopes Policy. Controversies over oil and gas drilling and coal mining continue to this day. But the communities of interest are well defined.

Banff-Canmore-Diamond Valley
Estimated Population: 48,862



Proposed Provincial Electoral Divisions 2026 **Produced: September 2026**

Banff-Canmore-Diamond Valley

The current Banff-Kananaskis electoral division was once a Banff-Cochrane electoral division until Cochrane was moved out by the 2017 Electoral Boundaries Commission. The 2017 Commission proposed an electoral division combining Banff National Park with Canmore, Kananaskis Country, the Stoney and Tsuut'ina First Nations Reserves and Springbank into a rather large electoral division. Cochrane was put in an electoral division with West Airdrie. That gave Cochrane an urban voice undiluted by the unique concerns of the mountain park communities.

The 2025-2026 Electoral Boundaries Commission proposed a similar-sized electoral division with similar boundaries, although the Commission proposed moving the Tsuut'ina First Nation Reserve into the Calgary riding of Calgary-Glenmore and Springbank into a Cochrane-Springbank electoral division.

As a consequence of the restoration of the Rocky Mountain House-Sundre electoral division, Banff-Kananaskis lost a lot of territory in its northeast quadrant. Also, as a consequence of the Commission's recommendation to put Springbank into an electoral division with Cochrane, the proposed Canmore-Banff electoral division lost a lot of population. It would also continue to be without the Springbank population if the advisory panel's proposal to put Springbank into Calgary-Bow and Calgary-West is approved.

The Commission's response to the population loss was to recommend making Banff a special consideration electoral division pursuant to Section 15(2) of the Electoral Boundaries Commission Act. But even as the Commission mapped it, the electoral division was only 27.2% below the provincial average, almost but not quite within the permitted variance of plus or minus 25%.

Furthermore, members of advisory panel were of the view that the intent of the Legislature in providing for electoral divisions which may have a population as much as 50% below the average population was to provide effective representation to people in huge, sparsely settled areas of the Province far away from Edmonton. It was not intended for an electoral division with two large upscale and prosperous towns on the TransCanada Highway, an hour out of Calgary, with air and bus service to Edmonton. Banff, at roughly 10,000 population, and Canmore, at roughly 17,000 population and growing, are not sparsely settled communities. They are not even far apart and the nearby Stoney First Nation at Morley adds another 5,000 people.

So the advisory panel is recommending against conferring Section 15(2) status on these two high-end vacation home communities or any electoral division which contains them.

But the Act does mandate that the population of ordinary electoral divisions must not be more than 25% below the average population. The addition of Diamond Valley and nearby hamlets or villages adds population of this electoral division.

So the advisory panel is proposing what really amounts to a minor change to the Canmore-Banff electoral division proposed by the 2025-2026 Electoral Boundaries Commission to capture the necessary population. The change is to the electoral division's southwest boundary to take in not only the Bearspaw First Nation Reserve near Longview, but also the Highway 22 corridor north through Longview, Diamond Valley, Millarville, Priddis and Bragg Creek. Other than this change and the adjustment to the northeast boundary of the electoral division to accommodate the restoration of the Rocky Mountain House-Sundre electoral division, Banff-Canmore-Diamond Valley is similar to what the 2025-2026 Electoral Boundaries Commission recommended, except that it does not require S.15(2) status.

The advisory panel recommends adding the Longview-Diamond Valley-Millarville-Priddis-Bragg Creek corridor to Banff-Canmore to avoid having to rely on Section 15(2) and to keep the Bow Valley, Kananaskis Country and the Foothills south and west of Calgary together. Diamond Valley, Millarville and Priddis and Bragg Creek all supply population to the electoral district in the same way that Springbank once did, and the connection of Diamond Valley, Millarville, Priddis and Bragg Creek to Kananaskis and Banff is arguably stronger than that the connection of Springbank to Banff.

Banff, Canmore, Kananaskis, Longview, Diamond Valley, Millarville, Priddis and Bragg Creek form a logically connected mountain-foothills community of interest. They share tourism, and conservation pressures, housing affordability challenges, highway access issues, emergency response demands, watershed and park management concerns.

These communities are not merely adjacent, they are connected by common geography, weather, infrastructure, and common provincial policy concerns. They all experience intense visitor and seasonal traffic. They must balance development with watershed protection and wildfire risk, and they face having a labour-market pressure tied to tourism, outdoor recreation and proximity to Calgary. These are not generic rural issues or generic urban issues. These are recognizable mountain-foothills playground issues.

Finally, separating Diamond Valley from Okotoks gives Okotoks its own representative to which it will soon be entitled if it continues to grow the way it has.

The electoral division continues to include the Stoney First Nation at Morley and the Ghost River communities of Waiparous, Beaupre and Benchlands, as well as the Stoney's Rabbit Hill First Nation near Benchlands. Portions of the M.D. of Bighorn No. 8 and Rocky View County are also included in the northeastern part of the electoral division.

4. Mandate of the Independent Advisory Panel

Far too much of the advisory panel's time and energy was spent debating the panel's mandate.

The advisory panel's mandate was clearly set out in Clause C of Government Motion 37.

In Clause C.(a), the Legislature established a Select Special Committee of the Legislature on Electoral Boundaries "to oversee an independent review of electoral boundaries of Alberta". The significance of the word "independent" may not be clear; but it could reasonably be interpreted to mean an *ab initio* review (i.e. a new review), a trial *de novo*, so to speak.

In Clause C.(e)(i) the advisory panel's mandate was to "conduct a review of the electoral boundaries of Alberta" and "make proposals as to the area, boundaries and names of the electoral divisions of Alberta". These words are identical to the words used in Section 3 of the Electoral Boundaries Commission Act to describe the "function "of an electoral boundaries commission. Enacted by the same Legislature, the words used in Motion 37 could not possibly mean any less than what they mean in the Electoral Boundaries Commission Act.

In Clause C. (e)(ii)(A), the panel was to "divide" the Province into 91 proposed electoral divisions.

In Clause C.(e)(ii)(B), having approved the Chairman's recommendations to increase the number of electoral divisions from 89 to 91 and having also accepted his proposal to restore the deleted electoral divisions, the Legislature directed the advisory panel to "incorporate" (into whatever other proposals the advisory panel might make) the Commission Chairman's Recommendation 5 subject to any modifications the panel considered necessary.

The advisory panel did not sit in appeal of the 2025-2026 Electoral Boundaries Commissions recommendations. Nor was the panel bound by the Commission's proposals. Nor was it mandated to defend, uphold or adopt the Commission's proposals. The advisory panel's process was not intended to be simply a continuation of the Electoral Boundaries Commission's process. The panel was mandated to review the existing electoral boundaries of Alberta, which were set in the 2017 Electoral Divisions Act, and make proposals to the Legislature as to their area, boundaries and names.

That said, the advisory panel's review of the Province's electoral boundaries took into consideration and often deferred to the 2025-2026 Commission's recommendations. That is, the panel considered all of the Commission's proposals: the majority's proposals, the minority's proposals and, as mandated by the Legislature, the Chairman's proposals. In deciding whether to make proposals for the area, boundaries and names of electoral divisions, deference was given to the proposals of the 2025-2026 Electoral Boundaries Commission, except where some or all of the advisory panel's members were of the view that a different area or boundary of an electoral division might better achieve effective representation based on recognized and statutorily prescribed considerations.

A "review" involves an assessment of merits, and an assessment can trigger "proposals". Government Motion 37 expressly mandated the panel to "review" the Province's electoral boundaries and make "proposals".

Conspicuous by its absence in the minority's interpretation of the advisory panel's mandate is any consideration of the effect of the mandate in Clause C. (e)(i) to make "proposals" as to the area, boundaries, and names of the electoral divisions of Alberta. The Legislature expressly mandated the advisory panel to make those proposals, not simply rubber-stamp what two or even three members of the 2025-2026 Electoral Boundaries Commission proposed.

The minority's opinion never does parse the actual wording of Government Motion 37 preferring, instead, to base their interpretation of the panel's mandate on their characterization of the "context" and "purpose" of the Motion. They ignore the admonishment of Justice Stratas whom they quote that text must be the "anchor" of any interpretive exercise.

The fact that the Legislature expressly mandated that the advisory panel's proposals comply with the population requirements of Section 15 and that they take into consideration effective representation and the factors set forth in Section 14 of the Act, also indicates that the Legislature anticipated the possibility of proposals being made for different electoral boundary configurations (different area, boundaries and names) than those proposed by the Commission.

The minority argue that the advisory panel's review ought not to have resulted in proposals to change what the 2025-2026 Electoral Boundaries Commission recommended except with respect to Lac Ste. Anne-Parkland and Rimbey-Rocky Mountain House-Sundre. But the use of the phrase "make proposals as to the area, boundaries, and names of the electoral divisions" certainly indicates that the Legislature contemplated that proposals for change might be made. And the changes of course would be to the existing electoral boundaries, not to electoral boundaries proposed by the Commission. The mandate was to review and make proposals with respect to the electoral boundaries of Alberta, not the electoral boundaries proposed by the Commission.

The advisory panel, in conducting its review, was also mandated to incorporate the 2025-2026 Electoral Boundaries Commission Chairman's proposals in Recommendation 5 of the Chairman's Addendum to the Majority Report, as noted in Clause C.(e)(ii)(B), "subject to any modifications the independent advisory panel considers necessary, taking into consideration the requirement for effective representation as guaranteed by the Canadian Charter of Rights and Freedoms".

The Legislature, in Government Motion 37, acted on the Chairman's proposal that Section 13 of the Electoral Boundaries Commission Act be amended to provide for 91 electoral divisions. It approved the proposed increase. The Legislature also indicated approval of the Chairman's proposal to restore the two electoral divisions which the Commission removed. As a consequence, the advisory panel was mandated to incorporate that recommendation into its proposals, subject to any modification the panel considered necessary. In other words, the Legislature approved of the restorations and mandated the panel to advise how it might be accomplished.

There were other suggestions contained in Recommendation 5 although they were less clear. Some of the suggestions were couched in mandatory terms. Some were couched in terms of requiring further "study". The mandatory language employed by the Chairman in Recommendation 5 may not have been deliberate. Clearly, it was inappropriate. Yet that mandatory language was seized upon by the minority of this panel as prohibiting this panel from reviewing and making proposals with respect to electoral divisions other than those directed by the Commission Chairman.

Electoral boundaries commissions make proposals. Electoral boundaries commissions do not direct, mandate, restrict, prohibit, prescribe or stipulate anything. They also do not "impose" conditions on the acceptance of their proposals. These are words and phrases used by the minority members of this advisory panel to support their position. They were not words used by the Commission Chairman.

The Chairman's direction that "The rest of the province as we propose must be maintained to the extent possible" would, if followed, render inoperative the Legislature's direction to the panel that it review all the Province's electoral boundaries and make proposals with respect to their area, boundaries and names. This is an interpretation of the advisory panel's mandate which the Legislature's wording of Government Motion 37 clearly does not support.

The minority's argument that the advisory panel exceeded its mandate is also belied by what the panel has actually done to discharge it. One need go no further than the Executive Summary to see that what the panel has done is review the electoral boundary divisions of Alberta, make proposals with respect to the area and boundaries of certain electoral divisions and incorporate the Commission Chairman's recommendations in Recommendation 5. That was the panel's mandate.

The minority members of the panel are the ones who have exceeded the panel's mandate. The mandate did not include passing judgment on the panel process or the constitutionality of its proposals, as if a proposal,

even a bad one, could ever be unconstitutional. Proposals are a form of free speech. They are not subject to *Charter* scrutiny. Indeed, the *Charter* protects the right to make them.

The minority's interpretation of the advisory panel's mandate fails to give effect to the clear and unambiguous meaning of the words of Government Motion 37. Indeed, the minority devotes more ink to the issue of the consequences of exceeding the mandate, the "centrality" of Recommendation 5 and "interpreting" Recommendation 5 than they do to Government Motion 37. And the reason the minority "spills more ink" on Recommendation 5 than on government Motion 37 is that, in their view, the advisory panel's mandate is not defined by Government Motion 37, but rather is defined and limited by the Commission Chairman's Recommendation 5.

The minority's argument that clause C.(e)(ii)(B) prevents the panel from reviewing all the electoral boundaries of Alberta and making proposals with respect to their area, boundaries and names, which Clause C.(e)(i) clearly mandated, is driven by the minority's agenda, namely to defend the electoral division proposals of the 2025-2026 Electoral Boundaries Commission at all costs. The minority admits as much: "We essentially view this "panel's work as a continuation and completion of the ABEBC's work." The minority argues that the advisory panel was tasked only to implement the specific directions of the judge who chaired the Commission, despite clear language in Government Motion 37 to the contrary.

In any event, the advisory panel implemented the Chairman's Recommendation 5. The panel recommended restoration of the two deleted electoral divisions. That was the recommendation. The other suggestions were simply the Chairman's attempt to tie the restoration to terms which would prevent any body, including the Legislature, from reviewing the Commission's electoral boundaries recommendations.

If the Chairman's "conditions" were binding, as the minority opinion suggests they were, then the 2025-2026 Electoral Boundaries Commission exceeded its mandate. We do not believe that even the Commission Chairman would consider his conditions as binding on the Legislature. And they were also not binding on the panel. The proof of that is to be found in Government Motion 37 and the panel's mandate to make any modifications to the Chairman's Recommendation 5 it considered necessary.

The minority assumes throughout their opinion that electoral boundaries commission's proposals have the force of law. They refuse to recognize that electoral boundaries commission proposals are just that: proposals. They also fail to recognize that the Legislature has the ultimate responsibility for electoral boundaries. Electoral boundaries commissions do not make "decisions" to which principles of collateral attack apply. Nor was the advisory panel's process one of "relitigating issues" which had already been decided. Nothing has been decided.

The minority argues that the Legislature's direction to incorporate the Chairman's recommendations subject only to modifications the panel considered "necessary" further limited the panel's mandate. But even if the Chairman's restoration recommendation was made subject to preserving the Commission's mapping, the Government Motion's earlier direction to review and make proposals with respect to the Province's electoral divisions made it "necessary" to adjust that so-called condition.

There would have been no need for an advisory panel to review and make proposals as to the areas, boundaries and names of the Province's electoral divisions if all it was to do was incorporate the recommendations found within Recommendation 5.

The word "incorporate" in Clause C.(e)(ii)(B) must also be given meaning. The minority opinion fails to deal with that. The only meaning the word "incorporate" could possibly have, on the wording of Government Motion 37, is to incorporate the Chairman's recommendations in the proposals the panel was clearly mandated to make in Clause C.(e)(i), the first Clause in the Motion prescribing the panel's mandate. To interpret Clause C.(e)(ii)(B), a later clause, as eviscerating the effect of a prior, more general, direction is questionable statutory interpretation.

The minority argues that Clause C.(e)(ii)(B) would have been superfluous or redundant if the panel's mandate was to review and make proposals with respect to all of the Province's electoral boundaries. With respect,

that is not correct. In Clause C.(e)(ii)(B), the Legislature was simply directing the panel with respect to a particular proposal it wished to see in the panel's proposals. The advisory panel was given more than one task. One was to review and make proposals. Another was to divide the Province into 91 proposed electoral divisions. Yet another was to incorporate the Chairman's recommendations in its proposals, subject to any modifications the independent advisory panel considered necessary. And finally, the panel was to report to the Legislature its proposals based on its review.

But for Clause C. (e)(ii)(B), the panel might not have incorporated any part of the Chairman's Recommendation 5. And so, Clause C.(e)(ii)(B) was clearly not superfluous. The Legislature, in Clause C.(e)(ii)(B), was simply indicating that one proposal it wished to see was a proposal to restore the two deleted electoral divisions. How that was proposed to be accomplished was to be incorporated into the panel's proposals.

Administrative law principles about ensuring the delegated power are consistent with the grant of authority has no application here. No legislative or other authority was delegated. The advisory panel was simply asked for advice, which it is now giving.

That two of our panel members would rely on principles of delegated authority is revealing. It suggests a mistaken view of the electoral boundary determination process. Electoral boundaries commissions in this Province are not delegated any legislative or other authority or power. Their function, as set out in Section 3 of the Act, is simply to review the existing electoral boundaries" and make proposals. The panel's mandate was identical; the same wording as is in the Act is in Government Motion 37. The Commission's proposals may or may not be approved. The advisory panel's proposals may or may not be approved. But it is the Legislature which does the approving or rejecting. It is the Legislature which has not only the ultimate authority to determine electoral boundaries, but also ultimate responsibility for their fairness. If it were otherwise, in the extreme event of a commission recommending patently unfair electoral boundaries, the Legislature would be powerless to correct it.

Likewise, the doctrine of collateral attack has no application. Contrary to what the minority asserts, no issues have been litigated before or decided by the Commission. The Commission has no authority to decide anything. Electoral boundaries commissions do not determine electoral boundaries. A Commission's only authority is to make proposals to the Legislature as to the area, boundaries and names of the Province's electoral divisions. And those proposals may be accepted, rejected or approved with alterations. In other words, those proposals are subject to review by the Legislature. The advisory panel has likewise been asked to assist the Legislature in that task, but only to the extent of making proposals which the Legislature can accept, reject or approve with alterations.

Nor does the concept of collateral attack apply to the facts of this case because, as the minority is aware, the proposals of the Commission have in fact been accorded a great deal of deference by the panel in formulating its proposals.

Because it is called a "commission" and is chaired by a judge does not change the fundamental nature of an electoral boundaries commission. It is not a quasi-judicial tribunal. Its function is limited to simply making proposals, to advising the Legislature. It is simply an advisory body. The 2025-2026 Electoral Boundaries Commission, and much less its Chairman acting alone, had no statutory or other authority to "impose" conditions on its or his recommendations or to dictate how its proposals were to be implemented.

We deal with the Chairman's recommendations elsewhere in this report. They were not non-partisan. As the minority opinion correctly points out, they had partisan implications. They were made for the express purpose of persuading the Legislature to uphold the Chairman's view of the electoral map of Alberta.

Nor were the Chairman's recommendations binding. They were suggestions presented for consideration, couched in terms of a recommendation. They were merely terms of a proposed compromise. They were made by the Chairman to persuade the Legislature to approve the majority's proposals. And the Legislature may yet be persuaded to approve the majority's proposals. But the Chairman's Recommendation 5 was no more and no less than a proposed compromise, offered for consideration and designed to persuade the Legislature to approve the Commission's majority proposals and to dissuade it from approving the Commission's minority proposals.

5. Commission Chairman's Recommendation 5

The Commission Chairman's Recommendation 5 was contained in an Addendum to the Majority Report in the 2025-2026 Electoral Boundaries Commission's Final Report. It was endorsed only by the Chairman and has been reproduced in the Appendix to the advisory panel's report.

Some of our panel members take the position that implementing, not simply incorporating Recommendation 5 in other proposals the advisory panel might make, was the panel's only mandate. Recommendation 5 was argued to be our pole star and nothing else. It was characterized by the minority members as something in the nature of a commandment from the 2025-2026 Electoral Boundaries Commission Chairman.

It was not. But let us have a closer look.

The Chairman prefaced his Recommendation 5 with his Commission's regret at having to recommend the removal of two rural seats.

The Chairman then went on to state that it was his duty to uphold the law, an allusion to the majority's criticism of the minority's recommendations which he considered unlawful.

The Chairman then characterized the Majority Report as "the product of trade-offs, compromises, and give and take". "Putting water in your wine" was a phrase he used. By that, the Chairman appears to concede that the law permits electoral boundaries commissions to engage in what he termed trade-offs, compromises, give and take or putting water in your wine. We agree.

The Chairman then made a proposal which he stated was made for the express purpose of dissuading the Legislature from accepting the Minority Report. In other words, the give and take continued in Recommendation 5. The Chairman was now bargaining with the Legislature.

The Chairman's proposal was this: if the Legislature finds that it cannot concur in the majority's proposal to remove two electoral divisions, then the Legislature ought to increase the number of electoral divisions and restore the two that were removed. The quid pro quo (the trade-off) was that the rest of the Province's electoral divisions be maintained to the extent possible. And in making his proposal the Chairman went on to suggest a number of restrictions he thought the restorations "should" meet. These restrictions were also intended to preserve proposals the Commission had made. However, the Chairman conceded that his recommendation, including the restrictions, might need to be studied by an all-party Committee of the Legislature.

In short, the Chairman, in effect, was propositioning the Legislature, proposing a bargain for its consideration, that he would support the restoration of two rural ridings if the Legislature would refrain from approving any of the minority recommendations.

The Legislature accepted some of the Chairman's proposed plan, but not all of it, at least not yet. The Legislature might be said to have put a little water in the Chairman's wine.

The Legislature did increase its size to 91 seats and approved the restoration of the two rural electoral divisions. But before agreeing to approve the majority's recommendations, the Legislature wanted the rest of the Province reviewed, not with a view to protecting the Commission's proposed electoral divisions, but with a view to having an independent panel of advisors review the Province's electoral divisions and make proposals.

As an advisory panel on electoral boundaries, we were cognizant of the fact that Section 11 of the Electoral Boundaries Commission Act contemplates the Legislative Assembly approving an electoral boundaries commission's proposals "with alterations". We saw our task as one of identifying alterations which might better achieve effective representation.

The point of all of this is to suggest that Recommendation 5 does not deserve deification. It was not "The Fifth Commandment". It was simply a bit of political "give and take". It was the making of yet another proposal (which is what electoral boundaries commissions are mandated to make), except that this proposal was not that of the Commission or of the Commission majority, but that of the Commission Chairman sitting alone.

Though not accepted in full, the Chairman's proposal was accepted in part. Whether the rest of the Chairman's proposal will be accepted or not remains to be seen. It is still open to the Legislature to approve the Commission's majority recommendations.

The advisory panel would propose instead that the Legislature consider some of its proposals; but the advisory panel understands that its proposals, like the Commission's proposals, need not be approved by the Legislature.

Some argue that by making the compromise proposal, the Chairman undermined the Majority Report. The panel's view is that there was nothing untoward about the bargain or compromise the Chairman proposed, although his fellow commissioners, for reasons which were not disclosed, were apparently opposed to it. Compromises are what electoral boundary making sometimes requires. Trade-offs or horse-trading are not unconstitutional so long as the public is not denied its right to effective representation. In this case the proposal was made with the intent of giving two parts of rural Alberta more effective representation, hardly an unconstitutional purpose. The point is that Recommendation 5 was little more than a creative proposal by the Commission Chairman that he hoped would dissuade the Legislature from approving the Commission's Minority Report.

For those who say this kind of give and take is wrong in principle, some of us might agree. But it is the reality of electoral boundary making. And in fairness to the advisory panel, it did its utmost to incorporate the Chairman's recommendations in its proposals, not only the letter but the spirit of them as well. Furthermore, the advisory panel deferred to most, but not all, of the Commission's electoral boundary recommendations.

But none of the foregoing detracts from what was the advisory panel's mandate, namely, to review and make proposals with respect to the rest of the Province's electoral divisions.

6. Unnecessary and Counter-Productive Controversy

Too much of the advisory panel's time and energy were taken up with responding to the indictments of the panel's minority who suggest that the process of the advisory panel was constitutionally reckless, an abuse of process, and that the panel's proposals infringed the *Charter*. Suggestions of "inappropriate partisan gamesmanship" and warnings about the "threat of litigation" dogged the panel throughout. The minority appointed themselves legal counsel to the panel, though no one invited them to assume that role.

Indictments, of course, are mere allegations of wrongdoing not yet proven. And as Chairman, I saw no support for these allegations. They were simply a continuation of the extreme, unjustified and unnecessary criticisms of the Minority Report in the 2025-2026 Electoral Boundaries Commission's Majority Report.

It is one thing to take issue with the merits of a particular electoral boundary proposal. It is quite another to parade the horrors of a *Charter* breach or, worse, insinuate gerrymandering on the part of fellow commissioners. But here is what the Commission's majority said of the minority;

> "What might be the minority's true motivation for this? Our friends south of the border have a term for this type of redistricting."

The classic *ad hominem* argument: impugn the motives of those you disagree with. But worse, it discourages participation in the electoral boundary-making process.

That said, motives are not irrelevant in assessing electoral boundary mapping. Indeed, motivation is the essence of gerrymandering. It is not a gerrymander to recommend or approve an electoral boundary change that favours or disadvantages a party or a candidate. All changes to electoral boundaries have the potential to do that. But if the change is proposed or approved for the purpose of favouring one party or candidate, then that is prohibited gerrymandering.

Transpositioning of votes from the last election following a proposed electoral boundary change which suggests a different electoral outcome is not proof of a gerrymander. Beware of those who base their gerrymandering allegations on transpositioning of votes. The methodology has its weaknesses. Secrecy of the vote prevents a transposition exercise to be 100% accurate, says Elections Canada. But more importantly, it does not take into account even current, let alone future changes in voting preferences.

Suggestions of gerrymandering or *Charter* breaches are allegations which should not be made absent reliable proof. Some evidence of motive may be found in the mapping itself; but much more is needed before such allegations can be justified. They bring the process of electoral boundary making into disrepute.

Those who criticize an electoral boundary determination should understand that there is not an electoral map in existence which cannot validly be criticized. But the reasons for such criticisms must be articulated in terms of recognized electoral boundary making principles and alternatives proposed. In some jurisdictions, there is actually a legal onus on those attacking an electoral boundary mapping scheme to present an alternate districting scheme which will reduce or eliminate the alleged unfairness or malapportionment. The reason for requiring alternatives is that only by comparison can unfairness be established. Mere allegations of *Charter* infringement or gerrymandering against well-meaning electoral boundaries commissioners, or even against those who make submissions to electoral boundaries commissions, are simply not helpful. Unsupported allegations of "obviously mischievous" submissions have no place in the process.

If it wasn't for the majority's response to the minority report in the 2025-2026 Electoral Boundaries Commission's Report, the Legislative Assembly of Alberta might have been able to give careful, thoughtful and thorough consideration to the recommendations of the Commissioners, both the majority and the minority Commissioners, without a lot of polarizing nonsense.

And, of course, the extreme criticisms caught the attention of journalists, jurists, political commentators and others. Particularly saddening were political scientists who might have contributed to the public's

understanding of the electoral boundary determination process. Instead, they preferred to stoke the flames of controversy.

And now the minority members of the advisory panel are attacking this panel's process in similar terms. They purport to be non-partisan. They are not. Their partisanship is founded on defending the proposals of the majority of the 2025-2026 Electoral Boundaries Commission at all costs. They admit as much: "We [the minority] essentially view this Panel's work as a continuation and completion of the AEBC's work." This despite a clear mandate from the Legislature to do otherwise.

It was not the panel's function or the function of any of its members to defend the proposals of either the majority or the minority of the recent Electoral Boundaries Commission. The panel's function was to review the Province's electoral boundaries and make its own independent and impartial proposals with respect to their boundaries, areas and names.

Attacking the process of the independent advisory panel as being constitutionally irregular or suggesting that its proposals are manifestly unconstitutional is simply a continuation of the controversy triggered by some of the more inflammatory allegations in the 2025-2026 Electoral Boundaries Commission's "Response to the Minority Report".

So a defence of not only the advisory panel process, but also the process of electoral boundary commissions generally, became a necessary, but counter-productive diversion from what was supposed to be the advisory panel's mandated task. The electoral boundaries commission process needs defending because irresponsible and inflammatory criticism, encouraged by the Commission's criticisms of its minority, and now by the criticisms of two of our panel members, is unfairly bringing the process into disrepute.

In March of this year, the 2025-2026 Electoral Boundaries Commission Final Report was tabled in the Legislature. A recommendation was contained in that report, formulated by the Chairman "for the express purpose of dissuading the Legislature from accepting the minority report". How adding two more electoral divisions and restoring the two deleted electoral divisions would dissuade the Legislature, one way or the other, from considering and perhaps approving some of the minority's proposals was not clear. The connection is not obvious and can only be understood as one of the Commission Chairman proposing a "compromise". Compromises are sometimes required when one is seeking approval for an electoral boundary proposal, whether the approval sought is that of one's fellow commissioners or that of the Legislature. But we would urge those reading Recommendation 5 to recognize it for what it is: an attempt to persuade the Legislature to approve the Majority Report instead of the Minority Report. An inducement intended to persuade the Legislature to approve the Majority recommendations.

The Legislature was confronted with an electoral boundary commission report which contained the Majority's proposals, the Minority's proposals, the Majority's Response to the Minority's proposals and an independent recommendation made by the Chairman, alone. Faced with conflicting electoral division proposals and the Chairman's suggested compromise, is it any wonder the Legislature called for a further review? To suggest that a further review, in these circumstances, is unconstitutional or contravenes the *Charter* or is inimicable to fair and effective representation is simply not supported by the facts or the law.

Nor is the review the advisory panel actually conducted, or the proposals it now makes, contrary to any constitutional or *Charter* principles.

The advisory panel has made proposals, all of which are worthy of consideration by the Legislature, notwithstanding that we did not all agree on all of them. The reasoned disagreements over the merits of the panel's proposals will assist the Legislature in its assessment of their merits. What will not assist are suggestions of exceeding mandates and/or *Charter* breaches. Indeed, I regret having had to respond to these suggestions. It is simply more fodder for the bloggers and others, who take delight in inflammatory criticism rather than meaningfully participating in the process.

The panel's proposals are based on recognized principles of electoral boundary making. Those engaged in the process of making electoral boundary proposals may weigh the relevant considerations differently. Take a look at the "relevant considerations" in Section 14 of the Electoral Boundaries Commission Act. Those considerations are not objective. They are subjective and weight must be attached to them. Nor do the relevant considerations always point to the same electoral boundaries configuration.

Reasonable people can reasonably disagree. There are no right answers. There are wrong answers, admittedly, but no right ones. It is no easy task. An imperfect solution to an impossible task is how the 2025-2026 Electoral Boundaries Commission Chairman characterized it. We would concur.

It simply cannot be fairly said that the advisory panel's process or its proposals somehow breach recognized principles of electoral boundary-making or the Constitution. Those allegations, assertions and opinions are repeated throughout the minority's opinion as if they were established facts, yet no support is provided. They have not been established. In this day and age, if one repeats an unsupported allegation or opinion often and eloquently enough, people will start to accept the allegation or opinion as fact, particularly if others simply unthinkingly repeat it. It is unnecessary, wrong and brings a very important process into disrepute.

7. Population

By law, the population of a proposed electoral division must not be more than 25% above and not more than 25% below the average population of all the proposed electoral divisions: Section 15(1) of the Electoral Boundaries Commission Act.

As a consequence, the Electoral Boundaries Commission Act prescribes rules for determining of the Province's population. Boundaries commissions are to use the most recent Federal Government "decennials census". But the results of the most recent decennial census (2026) were not available to the Commission, nor were they available to the advisory panel. They will not be released until 2027. In that event, the Act permits an electoral boundaries commission to use "a province-wide census that is more recent than the decennial census"; so long as it is used in conjunction with information provided in the Federal Government's last decennial census. See Section 12 of the Electoral Boundaries Commission Act in the Appendix to this report for the hierarchy of rules governing the determination of the population of Alberta. The rules are dictated by what census information is available and how recent that information is.

Electoral boundaries commissions have historically struggled deciding on appropriate population figures. The 2025-2026 Electoral Boundaries Commission struggled with the issue, but aided by some very good statisticians and demographers, they relied on the 2024 mid-year population estimates which were released in May of 2025 or about the time the Commission got started. The Commission was unanimous in its decision to use these population figures. The Commission used the number of 4,888,723 for Alberta's population as the most accurate and verified population that it had at its disposal.

The advisory panel too was unanimous in using that population figure for several reasons. The first was that the Federal Government's decennial census results will not be released until 2027. Even the mid-2025 provincial population estimates were not scheduled to be released until after the advisory panel was well into its mandate. The advisory panel was appointed in June 2026. The mid-2025 population estimates were not scheduled to be released until July 2026. Indeed, the advisory panel is not aware whether they have yet been released.

Another reason for the panel to rely on the 2024 mid-year population estimates the Commission used was so that comparisons between what the advisory panel recommended and what the 2025-2026 Electoral Boundaries Commission recommended might be made on the basis of the same population estimates.

Of course, in seeking population parity or relative population parity, or "population balancing" as it is sometimes called, one needs to know not only the population of the Province in order to divide it by the number of electoral divisions for the average population of the proposed electoral division, but also the population of the proposed electoral division being considered. The advisory panel relied on Elections Alberta for the populations of the electoral divisions it proposed. Elections Alberta has software that instantly produces population numbers for proposed electoral division configurations the panel was considering. The proposed electoral boundaries can be manipulated on a computer screen, and the resultant population instantly pops up.

Elections Alberta maps population for so-called "dissemination areas" which are geographic areas defined by Statistics Canada for census purposes. Statistics Canada apparently has defined roughly 6,000 dissemination areas in Alberta. The Federal Government attempts to count the people in those areas every 10 years. The Provincial Government (the Office of Statistics and Information at the Alberta Treasury Board) then estimates growth or decline in the population of dissemination areas based on a multitude of indices and actual counts. Elections Alberta then maps those dissemination area populations in order that electoral boundaries commissions and others might know how many people are likely to live within a defined geographic area.

There are a number of checks and cross-checks which are employed to ensure the validity of the dissemination area population estimates. In short, voters can be assured that the populations of proposed

electoral divisions are reasonably accurate. Those population estimates are not just relied upon for electoral boundary making, they are relied upon by the Government, municipalities, health authorities, licensing authorities, school authorities, insurance companies, and other commercial enterprises for the decisions they make. In the advisory panel's view, criticisms of the Commission's use of the population estimates it used are unjustified.

Having divided the Province into 91 electoral divisions, as the advisory panel was mandated to do, the panel arrived at an average population of the proposed 91 electoral divisions, employing the following formula:

$$\frac{\text{Total Estimated Population}}{\text{No. of Electoral Divisions}} = \text{The average population of the electoral division}$$

$$\frac{4{,}888{,}723}{91} = 53{,}722$$

As a consequence, the advisory panel based its proposals on an average electoral division population of 53,722.

Section 15(1) of the Electoral Boundaries Commission Act states that the population of a proposed electoral division must not be more than 25% above nor more than 25% below. Twenty-five percent of 53,722 is 13,430. Therefore, the population of an electoral division may vary from 40,292 to 67,152. (There is provision in the Act for four special consideration electoral divisions, but the 25% rule applies unless the statutory criteria for special consideration electoral divisions are met, and then only in respect of four electoral divisions.)

There have been suggestions that electoral boundaries mapping should be based on the number of electors in any given electoral division. That would require an amendment to the Electoral Boundaries Commission Act which states that it is the population, not the number of electors, which must meet the plus or minus 25% rule. That is, it is population, not electors, which an electoral boundaries commission and the advisory panel must consider in recommending electoral boundaries.

In the last general election only 60% of those registered to vote voted and voter turnout percentages varied widely from one electoral division to the next. They also vary widely over time. But, regardless, once elected, an MLA is supposed to or assumed to represent everyone in the electoral division, not just those who voted. And that is a reason why population is used to determine the areas of electoral divisions. Basing electoral boundaries on numbers of actual voters, or on the number of people registered to vote, is something which would have to be studied carefully. It is not unprecedented, but the panel is not in a position to recommend it or recommend against it.

8. Population Parity

There are only two considerations that must be taken into account (i.e. are compulsory) in determining electoral division boundaries. One is relative population parity as defined in Section 15 (1) of the Electoral Boundaries Commission Act (the 25% plus or minus variation restriction). The other factor or consideration which must be taken into account is the requirement for what has been called "effective representation". Effective representation, the courts say, is what is guaranteed by the *Charter*. Effective representation is also required by Alberta's Electoral Boundaries Commission Act (S.14)

Relative population parity is an objective, empirical consideration. Indeed, it is an important component of effective representation. Effective representation, apart from population parity, is not susceptible to empirical measurement. Effective representation can be interpreted in many different ways by those who determine electoral boundaries, and that alone is a reason for insisting on relative voter parity as a governor on the electoral boundary proposals.

But in fixing the boundaries of proposed electoral division, effective representation is required by law to be considered separate and apart from population parity which it is said can sometimes hinder effective representation.

Other relevant considerations which only may be considered in determining the areas to be included in a fixing of the boundaries of proposed electoral divisions are set out in Section 14 of the Electoral Boundaries Commission Act. They include:

(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 factors

(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

An additional factor which the Supreme Court identified as requiring consideration was "minority representation". And, the Supreme Court adds, "the list [of relevant considerations] is not closed".

But why must or may these factors need to be taken into consideration?

The Supreme Court's answer is "to ensure that our legislative assemblies effectively represent the diversity of our social mosaic."

And all of these factors, the Supreme Court says, "may justify departure from absolute voter parity in the pursuit of more effective representation".

Suffice it to say the advisory panel has considered all of these statutory considerations and relative population-parity in making its proposals.

Often, we were confronted with a population variance that, while within the plus or minus 25% limit, was considerably more than what the courts have indicated they would like to see. But chasing the population needle across the sky can also produce incongruous electoral divisions.

The Commission had variances as little as 0.2% to as high as 14% (ignoring for the moment that limited number of special consideration electoral divisions which are permitted to have a population as much as 50% below the average population).

In the U.S. where voter parity is king (for reasons that may make sense down there), insistence upon absolute voter parity has led to the development of things like the Loosemore-Hanby and Gallagher indexes that

measure disproportionality in an electoral system. They are mathematical formulae used to measure the total disproportionality between a party's share of the vote and its share of the seats in a Legislature. The extent to which seat share diverges from voter share. There is also apparently a Rae index which measures the average deviation. While the Loosemore-Hanby index measures total deviation, the Rae Index measures average deviation.

As an erstwhile lawyer and judge, numeracy is not something I ever possessed; but if one looks at the last election, the UCP received roughly 52% of the popular vote and 49 seats or 57% of the seats in the Legislature. The NDP received 44% of the popular vote and 38 seats or almost 44% of the seats. Not perfect, but not bad.

Secondly, if you add up all the population variances in the electoral divisions mapped by the 2025-2026 Electoral Boundaries Commission, eliminate the Section 15(2) special consideration electoral divisions (Central Peace-Notley, Lesser Slave Lake, and Canmore-Banff); and divide by the number of electoral divisions, an average variance of 4.63% emerges, or 5.72% if you include the widely varying special consideration electoral divisions. Pretty close to absolute parity, never mind relative population parity.

Kudos to the Commission, but minimal population variance tells you little about the merit of any particular electoral division or electoral map. In Canada, a 4.6 % average variance is not bad. In the U.S., the courts sometimes insist on less than a 1% variation. But look at the maps chasing the population parity produce. It's not always gerrymandering that produces strange looking electoral divisions. Chasing population parity can also produce them.

9. Effective Representation

Two mandatory factors which must be considered in electoral mapping are relative voter parity and effective representation.

Relative voter parity has been defined by the Electoral Boundaries Commission Act as plus or minor 25%.

"Effective representation" is a term that has never been authoritatively defined, perhaps because a precise definition is not possible.

The term effective representation raises more questions than it answers. Firstly, who is being represented? Individuals? Communities? Municipalities? Interests? Political parties? Does the elected representative represent his or her constituents or does he or she represent the political party he or she is affiliated with?

The Supreme Court's ruling that effective representation is what is guaranteed in the right to vote provision of the Canadian Charter of Rights and Freedoms suggests that effective representation is the right of the individual, the *Charter* being an individual rights statute. That is, the individual serves as the relevant unit of effective political representation, yet the population being represented is the aggregate of individuals living in a defined geographic area.

The question is whether the right to effective representation is the right of the individual or the right of substantial and identifiable communities of interest. In other jurisdictions where protection of visible minorities, or even visible majorities, is an issue, the right to effective representation is the right of significant (in terms of population) communities of interest to have the opportunity to elect a representative of their own choosing to the Legislature. It is not a guarantee that the community of interest will be represented in the Legislature, but the community must be given a realistic opportunity to elect a representative of that community's choice. The foregoing definition, as far as the panel knows, has not been adopted in Canada.

Suffice it to say that effective representation, to date, has been defined narrowly by the courts in terms of the citizen's right to a relatively undiluted vote and to the representative's ability to discharge his role as an ombudsman (which, of course, is only one of many roles an elected representative plays in an electoral system where the voter is effectively restricted to voting for candidates which have already been chosen for him or her by registered political parties).

There are prescribed criteria for determining whether effective representation might be achieved. Those criteria are to be found in Section 14 and in Electoral Boundaries Commission Act. They are also found in decided cases. Criteria such as communities of interest, regional, rural or urban municipalities, geographic constraints and clear and understandable boundaries, etc. are prescribed. And that is why successive electoral boundaries commissions have recommended electoral divisions in accordance with these criteria, sometimes at the expense of population parity. But these criteria or "relevant considerations" are often the subject of debate among reasonable, well-meaning electoral boundaries commissioners. And based on the review we did of the submissions made to the 2025-2026 Electoral Boundaries Commission, the weighing of relevant considerations is also the subject of debate among electors.

As a consequence, there can be understandable differences of opinion as to how effective representation is best achieved and therefore different electoral division configurations proposed.

10. Hybrid Electoral Divisions

The 2025-2026 Electoral Boundaries Commission devoted an entire section in its Final Report to hybrids. We would recommend that those who have objections to hybrids read what the Commission had to say.

The Commission concluded, as many boundaries commissions before it concluded, that one cannot draw an electoral map of Alberta which achieves effective representation without creating hybrid electoral divisions. Hybrid electoral divisions have been in almost every electoral map of Alberta since its inception. They were given judicial sanction by the Alberta Court of Appeal in the early 1990's.

There are 19 cities in the province of Alberta and all but Lethbridge have been a part of a hybrid. Even Red Deer was hybridized in the past to give it enough population for two MLAs. In fact, the Electoral Boundaries Commission Act of 1990 required Red Deer and a number of other cities to be hybridized.

There are currently (since 2017)19 hybrid electoral divisions. The 2025-2026 Electoral Boundaries Commission recommended eight more, most of which were in Calgary and Edmonton, for a total of 27 hybrids out of 89 or 91 electoral divisions overall.

The independent advisory panel is now proposing an additional three quasi-hybrids in Calgary and three real hybrids in southern Alberta. The panel also proposes to borrow a bit of population from Red Deer to give the Blackfalds-Innisfail the population it needs.

The 2025-2026 Electoral Boundaries Commission developed principles which the Commission endeavoured to apply in determining where hybrids should be used. The advisory panel considered these principles and used them in deciding whether or not to propose a hybrid electoral division. The principles applied by the Commission and now by the advisory panel are worth repeating. They are quoted as follows:

1. "For some time, hybrids have been a necessity for smaller cities and town to achieve effective representation

2. As population per electoral divisions increased, it has become untenable for smaller cities to remain intact as a single electoral division. For example, in the early 1990s the cities of Red Deer and Medicine Hat were too large for one electoral division and not large enough for two urban-only electoral divisions. Consequently, hybrid electoral divisions were used in those cities.

3. A form of blended electoral division which contained all or part of a smaller or mid-size city along with a surrounding rural municipality became commonplace in the 1990s and early 2000s. The population numbers and geography along with the need to maintain relative voter parity forced this transition.

4. Currently, high population growth in the major cities along with a change in the Act has made the option of hybrids available and necessary province-wide.

5. The province-wide evolution of hybrids has resulted in the City of Red Deer being the only urban centre that does not have a hybrid electoral division (although this Commission minimally used the hybrid model for one constituency in Lethbridge).

6. Extending hybrids to the major cities must be done carefully and may be particularly appropriate when:

   a) Infrastructure such as shared water or sewer exists, similarly built areas are in place (i.e. density and style of housing), and where transportation routes predominantly or exclusively require non-urban residents to travel through the city;

   b) Indigenous reserves that are immediately adjacent to large cities, especially where there is evidence of travel and substantive interactions in both directions, including and members living off-reserve in adjacent communities, Indigenous and non-Indigenous housing developments on-reserve, recreation, shopping, and other interactions. This should be supported by direct input from the Indigenous communities themselves.

7. The factors noted above are to be used as guidelines rather than definite characteristics for each hybrid constituency. Communities of interest may supersede these factors. Similarly, the need to ensure effective representation for all Albertans may necessitate at times that a hybrid be used purely to satisfy the numerical challenge across the province that a Commission faces."

The independent advisory panel applied these principles to the proposals it made in west Calgary and in Lethbridge. The panel felt comfortable in doing that because the Chairman of the 2025-2026 Electoral Boundaries Commission, in his Addendum, indicated that he did not consider the hybridization of Bearspaw or Springbank with Calgary to be unreasonable. Indeed, the Commission, itself hybridized the electoral division of Calgary-West by putting a community outside Calgary into it. That community was Elbow Valley and the area which the Commission incorporated into the electoral division stretched all the way from the city limits to Highway 22 northeast of Bragg Creek.

The Chairman also indicated that he did not consider the hybridization of Lethbridge to be necessarily unreasonable or procedurally unfair given the extensive submissions the Commission received about that hybridization. The Chairman's complaint appeared to relate to other hybrids which this panel is not recommending, not because they were necessarily unreasonable, but only because the panel did not have enough time to thoroughly review their merits or otherwise.

The minority's criticism of the panel's proposed hybrids can be summarized in two sentences. The Commission's hybrids are fine. The advisory panels are not.

The use of the word "hybrid" in the 2025-2026 Electoral Boundaries Commission Report and in this section of the panel's report assumes the definition that the Commission gave the term; namely an electoral division which contains all or a part of one of Alberta's 19 or 20 cities and a portion of an adjacent municipality or country.

A better definition might eliminate a lot of needless argument that might cause an electoral boundaries commission to focus on the potentially detrimental effect of hybrids, namely that of mixing populations with different communities of interest. For example, the mixing of urban with rural agrarian populations.

When populations of differing interests are put in the same electoral division, it is argued that it becomes difficult for the elected representative to represent both populations when their interests' conflict. And, as a consequence, effective representation is not achieved. Indeed, it is hindered. There are those who say that such fears are unfounded, including a member of the advisory panel, who was the elected representative of one of the largest hybrid electoral divisions in Canada for many years.

The hybrids proposed by the advisory panel for Calgary were not hybrids at all according to the foregoing definition. They were simply electoral divisions mixing suburban city folks with suburban country residential folks, some of whom live closer to downtown Calgary then a lot of communities within the city. In the case of all three of the proposed Calgary electoral divisions, the people outside the city have the same interests as those within the city and they interact with each other on a daily basis.

Where the concern arises is when the hybrid mixes populations of demonstrably different interests. That was a concern in proposing the Lethbridge hybrids which are true hybrids in that substantial urban and agrarian populations are recommended to be put in the same electoral division. That is, people with different interests are being mixed in a single electoral division with a single representative. However, based on the experience of one of our panel who was the elected representative of such a hybrid electoral division for about 15 years, we were assured that effective representation can be achieved in these situations if both the urban and the rural population share the same interests.

But it was more than our panel member's electoral experience that persuaded those of us uncomfortable with the hybridization to support the proposal. It was also the evidence of what might be called an identifiable, shared southern Alberta community of interest driven by dependency on the agriculture and food processing industries stretching from Medicine Hat to the upper reaches of the Waterton and St. Mary Rivers.

11. Electoral Boundaries Determination is an Iterative Process

Those who suggest that the independent advisory panel process is unconstitutional should understand that the determination of electoral boundaries is necessarily an iterative process. An iterative process is a process of accomplishing something which is repetitive and which involves reviewing, proposing, testing, analyzing, amending and refining something to improve a result. It is a process that involves a lot of reiterations.

The Electoral Boundaries Commission Act expressly requires an iterative process. The Act requires an interim report, then a final report by a boundaries commission and then a review of the commission's recommendations by the Legislature and ultimately either approval or approval with modification or rejection of the commission's recommendations by the Legislature.

The commission's process itself is also iterative. An electoral boundaries commission's mandate is to review the current electoral boundaries and then make proposals to the Legislature as to the area, boundaries and names of the electoral divisions. But before a commission makes any proposals, it must hold public hearings to get input from the public. Having received and considered that input, the commission then prepares an interim report for the Legislature and the public to consider; a trial balloon so to speak. It is typically a unanimous document, but nothing turns on that unanimity because after it is tabled, the interim report is made public and further hearings are held to provide the opportunity for input on the area and boundaries of proposed electoral divisions. The commission then considers that further public input and puts its proposals, unanimous or otherwise, in a final report which is tabled in the Legislature. The commissioners proposals are then reviewed by the Legislature and are either approved or approved with modifications or rejected.

The process, of course, cannot go on forever, but there is nothing wrong with the Legislature taking a "second look" at what was proposed so long as that second look is done with a view to achieving a more effective representation, not with a view to giving an electoral advantage to any political party or to any incumbent or individual aspiring to remain or become a Member of the Legislative Assembly.

The independent advisory panel's review is merely another iterative step in the process of the Legislature making a decision on what the electoral map of Alberta will look like at the next general election. The advisory panel's process has been authorized by a Resolution of the Legislature in the same manner that the Legislature authorizes an electoral boundaries commission in accordance with the provisions of the Electoral Boundaries Commission Act.

If the Legislative Assembly approves the proposals of a commission or approves the proposals with alterations, it must do so by resolution. The Government then must introduce a Bill to establish new electoral divisions for the Province in accordance with the Assembly's resolution. That Bill, of course, must then go through the normal legislative process of consideration and debate in the Legislature. Amendments may be proposed and voted on. Further reconsideration may be required. The only requirement is that the Bill must state that any enactment of the Bill must come into force on the day that the writ is issued for the next general election.

In the instant case, the Legislative Assembly was presented with a Final Report which included a Majority Report, a Minority Report and an Addendum to the Majority Report authored by the Chairman. The Act contemplates that the commission's final report may not be unanimous. In that event, the report of the majority is the report of the commission. Nevertheless, in the event of a strong dissent, the Legislature has decisions to make which might reasonably call for further inquiry.

The Majority Report expressed regret that the Commission had to remove two ridings because it was limited to mapping 89 rather than 91 electoral divisions. The Chairman suggested that if the Legislature was not inclined to approve the majority's proposal to remove the two electoral divisions, then the Legislature ought to increase the number of electoral divisions to 91and restore the two electoral divisions the Commission

proposed to be removed. The Chairman of the Commission also suggested that further study of his recommendations by an all-party committee of the Legislature might be necessary.

The Legislature responded by resolution, Government Motion 37, urging the Government to introduce a Bill amending Section 13 of the Electoral Boundaries Commission Act to provide for 91 electoral divisions instead of 89. The resolution also called for a further independent review of the Province's electoral divisions, including the restoration of the two deleted electoral divisions.

The addition of two more electoral divisions made a further review of the current (2017) electoral divisions and those recommended by the 2025-2026 Electoral Boundaries Commission necessary. Adding two electoral divisions is like adding two pieces to an already-completed jig saw puzzle. Adjustments had to be made. And so the Legislative Assembly established a Select Special Committee on Electoral Boundaries to oversee an independent review of the electoral boundaries of Alberta. The Legislative Assembly directed the Committee to engage independent advisors to conduct that review and make proposals.

The Legislative Assembly directed that the independent advisory panel, in conducting its review of the Province's electoral divisions, divide the Province into 91 electoral divisions, and make proposals as to their boundaries and areas, and incorporate in those proposals the Chairman's recommendations found within Recommendation 5 in the Addendum to the Majority Report. Incorporating the recommendations in Recommendation 5 was expressly made subject to any modifications the independent advisory panel considered necessary.

Having conducted its review of the electoral boundaries of Alberta; having made proposals as to the area, boundaries and names of the electoral divisions; and having incorporated the recommendation of the 2025-2026 Electoral Boundaries Commission Chairman, the advisory panel was to submit to the Select Special Committee of the Legislature on Electoral Boundaries a report based on its review and proposals.

The Select Special Committee was then to review the advisory panel's report, including making "observations" in respect of it. At the conclusion of its review, the Select Special Committee was to submit the independent advisory panel's report to the Legislature. And in due course, the Legislature will presumably consider the advisory panel's report, the Commission's report and any other information the Legislature considers relevant in order to make a decision on the areas, boundaries and names of the Province's electoral divisions for the next general election.

That electoral boundary determination is an iterative process might be illustrated by the following list of the steps required to be taken in order to set Alberta's electoral boundaries:

1. Public hearings
2. Interim report
3. More public hearings
4. Final report with the Commission's proposals
5. The Commission Chairman's separate recommendations
6. Legislature's review of Commission Report and Chair's recommendations
7. Legislature's resolution to increase number of seats to 91
8. Legislature appoints Committee of the Legislature and independent advisory panel to review, make proposals and to incorporate Chairman's recommendations
9. Advisory panel conducts its review
10. Advisory panel submits report based on its review
11. Legislative Committee convenes to review report and comment on it
12. Legislative Committee submits advisory panel's report and Legislative Committee's observations to the Legislature
13. Legislature considers and deliberates

None of the foregoing deliberative steps support the allegation that the process is unconstitutional.

12. The Law Governing Electoral Boundaries

The majority of the advisory panel based their electoral boundary proposals on the following understanding of the law:

1. Mapping of electoral divisions is subject to the *Charter* and therefore to judicial scrutiny.
2. The *Charter* right is the right to effective representation. Departures will be found to violate the *Charter*.
3. Voter parity or relative voter parity is the most important consideration in determining electoral division boundaries. (It is also the only empirically measurable consideration, although it does not prevent gerrymandering.)
4. Deviations from voter parity may be justified on the grounds of practical impossibility or to provide more effective representation.
5. Minority representation may justify deviation from voter parity to ensure that Legislatures represent the diversity of our populations. Voter parity may also be departed from in order to ensure effective representation to large, remote and sparsely-settled regions.
6. Whether the *Charter* guarantee of effective representation extends to the "process" of electoral boundary making remains an open question. For example, whether or not a Legislature is required to establish a truly independent electoral boundaries commission with experts and the power to actually determine electoral boundaries, rather than simply recommend them to the Legislature, remains an open question. The recent Quebec Supreme Court case was argued on the basis that the alleged "interference" with the electoral boundaries determination process by the Quebec Legislature infringed the *Charter*. That is, the Supreme Court simply assumed a *Charter* breach and then went on to consider whether it was justified. The Supreme Court did not opine on whether there was, in fact or in law, a *Charter* breach. The constitutionality of the alleged act of interference by the Quebec Legislature with the Quebec electoral boundaries commission's process was not argued. Nevertheless, there have been non-binding judicial pronouncements on the issue of whether or not the electoral boundaries determination process itself is subject to *Charter* scrutiny.

   (a) Sopinka, J in the "Carter" case [1991] 2 SCR 158

   "The *Charter* guarantee in S.3 does not extend to the process. The Legislature was not required to establish an electoral commission or to ensure that a commission, when established, was able to fulfill its mandate freely without guidelines imposed by the Legislature." (*obiter dicta* in a dissenting opinion on another issue)

   (b) Coté and Rowe, J.J. in Quebec (A.G.) v. Lalande 2026 SCC 13

   "In our opinion, while the Quebec legislature made the choice to delegate decision-making authority for establishing the provincial electoral map to the CRÉ, making provision for electoral representation ultimately falls within the legislation jurisdiction of the Parliament of Quebec under S.45 of the Constitution Act, 1982. Moreover, even when the provincial legislature has delegated this function, its involvement in adjusting boundaries does not make the process unfair or arbitrary (Reference re Electoral Boundaries at p 194)." (again, *obiter dicta* in a dissent on another issue)

Suffice it to say that if the electoral boundary determination process is completely delegated to an independent commission, it will be done by an Act of the Legislature, an Act which is capable of amendment or repeal. And so it should be. The Legislature is the body which is ultimately responsible for ensuring effective representation. It is also the body which is most profoundly affected by an electoral boundaries commission's proposals.

7. The Legislative Assembly's response to the 2025-2026 Alberta Electoral Boundaries Commission Report was not irregular, unprecedented, or even surprising, given the provisions of the Electoral Boundaries Commission Act, which are not unlike those in electoral boundaries legislation elsewhere in Canada. Alberta, Saskatchewan, B.C., P.E.I. and Nova Scotia's legislation expressly provides the Legislature the power to reject electoral boundaries commission's recommendations. In the Yukon, it appears that the Legislature itself determines electoral boundaries. In Newfoundland and in the Northwest Territories, after tabling an electoral boundaries commission's report, the report may be debated by their respective Legislatures. Recently, in the Northwest Territory's electoral boundaries commission's recommendations were rejected by the Legislature.

8. It is true that in a number of provinces, the government must table a bill implementing the commission's recommendations. What is not clear, likely deliberately, is whether such bills are subject to the usual debate and possible amendment to which all proposed legislation is subject.

9. New Brunswick's legislation and that of the federal Parliament provide for a process whereby a certain number of MLAs or MPs can file written objections to an electoral boundaries commission's recommendation. Such objections require the electoral boundaries commissions to reconsider their recommendations; although in the end, the electoral boundaries commissions' "rulings" on such objections appear to be binding on the New Brunswick Legislature and Parliament.

10. At least two Supreme Court justices have opined that there is no one right or correct way to determine electoral boundaries. Differences of opinions are to be expected.

    Coté and Rowe, J.J. in Quebec (A.G.) v. Lalande 2026 SCC 13

    "...when it comes to electoral representation, 'there are dozens, even hundreds of plausible solutions, each with its own advantages and disadvantages. Giving effect to the right to effective representation of all electors necessarily involves balancing various factors and reconciling competing interests. Each conceivable alternative will have an impact on the electoral map such that it is impossible to identify a single 'correct solution'..."

11. There is a right in every citizen not to have his or her vote unduly diluted, although some dilution is inevitable. However, there is no right in the citizen to not have his or her vote diluted, so long as it is not unduly diluted and the reason for the dilution is to give the citizen in question or other citizens better representation.

    ((a) Reference re Order in Council in Respect of the Electoral Boundaries Commission Act 1991 ABCA 317

    (b) Reference re Order in Council Respecting the Electoral Division Statues Amendment Act 1994 ABCA 342

12. Hybrids have been sanctioned by the Courts. "We accept the reasonableness of 'hybrid areas' ": the Alberta Court of Appeal in 1991 (citation above). The Court of Appeal was commenting on a provision in the 1990 Electoral Boundaries Commission Act, which actually mandated hybrids for Red Deer, Medicine Hat, St. Albert and Grande Prairie. However, public resistance to hybrids however was noted by the Court of Appeal in its subsequent electoral boundaries decision three years later:

    "The immediate cause of the problem faced by the Legislature in 1993 was the conviction, by the Commission and by the Committee, and by most of the parties before us, that the people of Alberta simply would not accept the idea that agrarian and non-agrarian populations would both feel adequately represented in the same constituency. We accept this sentiment as a dramatic example of the importance of the idea of effective community representation."

Regardless, the use of hybrids has continued unabated since that observation was made some 30-plus years ago. Elsewhere in this report we explain the many reasons why hybrid electoral divisions are necessary.

13. Minority Opinion of Two Members of the Independent Advisory Panel

MINORITY OPINION OF GERARD J KENNEDY AND BRENT L ROBINSON
2026 INDEPENDENT ADVISORY PANEL OF THE SPECIAL SELECT COMMITTEE ON ELECTORAL BOUNDARIES
LEGISLATURE OF ALBERTA

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Executive Summary

We, Gerard Kennedy and Brent Robinson, have had the opportunity to review portions of the draft report of our fellow panelists, the Honourable Brian O'Ferrall (Chair), Darwin Durnie, and the Honourable Monte Solberg. We are grateful to have discussed and reviewed these matters with them in good faith. **It is encouraging that the Panel has mostly achieved unanimity in how to restore two rural electoral divisions that the Alberta Electoral Boundaries Commission ("ABEBC") recommended removing**. Those two electoral divisions are:

1) Lac Ste. Anne: a successor electoral division to Lac Ste. Anne-Parkland; and
2) Rocky Mountain House-Sundre: a successor electoral division to Rimbey-Rocky-Mountain House-Sundre, which we recommend receive protection under s 15(2) of the *Electoral Boundaries Commission Act*, RSA 2000, c E-3.

The restoration of Lac Ste. Anne has cascading impacts on fourteen electoral divisions, eight of which are recommended to have boundaries proposed in the ABEBC Interim Report. We unanimously agree with our colleagues not only on these boundaries, but also that the restoration of Lac Ste. Anne is constitutionally compliant. It improves effective representation for residents of all affected electoral divisions and the province as a whole.

We are of the further opinion that the restoration of Rocky Mountain House-Sundre can be constitutionally compliant, with cascading impacts on only six other electoral divisions. We disagree with our colleagues, however, on the boundaries of their proposed electoral divisions of Olds-Didsbury-Three Hills and Canmore-Banff insofar as they connect to changes south of Airdrie. We also disagree, although not as strongly, with our colleagues' proposed boundaries of Red Deer-South and Blackfalds-Innisfail.

Most importantly, we cannot agree with our colleagues' other recommended boundary changes to other electoral divisions south of Airdrie.

First and foremost, we are of the opinion that all additional changes that our colleagues recommend to areas south of Airdrie fall outside this Panel's mandate. It is our view that Motion 37, which empowers this Panel, provides a very narrow mandate: incorporate Recommendation 5 of ABEBC Chair Justice Dallas Miller. Essentially, the Panel is to recommend how to restore the two electoral divisions that the majority of the ABEBC recommended be removed, thereby generating a map of 91 electoral divisions for the next provincial election. **The Panel must also follow the strict non-partisan terms prescribed by Justice Miller (including specific maps of Calgary, Edmonton, and Lethbridge) and the longstanding norms of electoral boundaries commissions in Canada.** Recommendation 5 seeks to preserve as many electoral boundaries as is practically feasible from the ABEBC Majority Report. Specifically, Recommendation 5 stipulates that expanding the Legislature to 91 seats and adding two rural seats should "have no impact on any electoral division in Airdrie or containing territory south of Airdrie's southernmost border, with the exception of Drumheller-Stettler".

Any changes to the terms prescribed by Justice Miller must be "necessary": in our view, such changes must be necessary to restore the two rural electoral divisions. Our colleagues have interpreted the mandate provided to the Panel in Motion 37 to recommend "necessary" changes more broadly. Even if that interpretation is accurate, however, any additional unrelated boundary change must be considered "necessary" to achieve effective representation as guaranteed by s 3 of the *Charter*. This is still a very narrow mandate, which our colleagues have interpreted unreasonably broadly.

Departing from a narrow interpretation of the Panel's mandate and Justice Miller's prescribed non-partisan terms is not a minor or technical issue of legal interpretation. Setting aside constitutionality, it may be considered an inappropriate use of the delegated authority under Motion 37 that our colleagues' advice is given at all. **By unreasonably interpreting this Panel's mandate, and thus giving this inappropriate advice, our colleagues imperil the constitutional ability of the legislature to rely on this Panel's advice. The legislature must forbear and consider only the advice to restore the two rural electoral divisions in a constitutionally compliant manner.**

We respond to the substance of our colleagues' proposed additional changes to areas south of Airdrie as a matter of thoroughness, even though it is our position that these recommendations are beyond this Panel's mandate.

It is our view that our colleagues' recommendations to move the communities of Springbank and Bearspaw into three Calgary electoral divisions are unnecessary to achieve effective representation. They also sit uncomfortably with Supreme Court of Canada and Alberta Court of Appeal decisions on voter parity and hybrid electoral divisions. Changes that our colleagues have recommended to four electoral divisions in Northeast and East Calgary also seem unnecessary to achieve effective representation.

Our colleagues have recommended removing an urban seat from Lethbridge, and replacing it with a mostly rural electoral division. **In other words, they have taken this Panel's mandate to add two rural electoral divisions to the map and have added three. This has significant cascading impacts throughout Southern Alberta that, in our respectful opinion, actively undermine effective representation.**

In general, the changes that our colleagues have proposed to electoral divisions south of Airdrie are based on two premises. One is that hybrid electoral divisions ought to be used more and that their use is justified even if it is not required to provide sensible electoral divisions with populations largely approximating the provincial average. The other is that the concept of "community of interest" can be used to justify incorporating rural regions with urban communities, even if the urban communities already have sensible electoral boundaries with populations that largely approximate the provincial average. These premises are highly contestable as a matter of good governance and best redistricting practices. Most of our colleagues' proposed boundaries were also clearly opposed by the vast majority of submissions that the ABEBC received. While we take it that our colleagues genuinely believe that this is in the best interests of creating the most effective representation for Alberta, the consequence is partisan outcomes that they either ignore or favour.

Our minority report speaks to legislators: **any adoption of recommendations beyond those tied directly to the restoration of the two rural divisions on the terms of Recommendation 5 will be constitutionally fraught.** The courts are likely to become involved. A real possibility is that the courts end up imposing a map for the next provincial election. If so, the elimination of the two rural electoral divisions may well be ordered. This will be a most unfortunate outcome for Alberta democracy. Our full report expands upon why.

I) Introduction

1. In October 2025, the properly constituted and independent Alberta Electoral Boundaries Commission (the "ABEBC") submitted a unanimous interim report (the "Interim Report") to the Legislative Assembly of Alberta, recommending a redistribution of Alberta's electoral divisions from 87 to 89 for the next provincial general election. This complied with the *Electoral Boundaries Commission Act*, RSA 2000, c E-3 (the "*Act*").

2. In March 2026, the final report revealed a sharply divided commission. The final majority report (the "ABEBC Majority Report") made relatively modest amendments to the Interim Report, trying to balance the exceptional population growth in the cities of Calgary, Edmonton, and Airdrie, while recognizing the particular representational challenges of rural and especially northern Alberta. The ABEBC Majority Report reversed a decades-long trend in Alberta redistricting towards greater population parity between electoral divisions. Even so, the need for an additional seat in Airdrie, a net of two in Calgary, and a net of one in Edmonton required the removal of two rural seats. The Minority Report ("ABEBC Minority Report") insisted that no rural seats could be removed. Though the motivation to preserve rural seats is laudable, the ABEBC Minority Report produced maps that were not compliant with case law regarding redistricting in Canada in general and Alberta in particular. These maps defied common sense in many cases and were not a reasonable exercise of the discretion given to the ABEBC under the *Act*. These were what Justice McLachlin (as she then was) warned about in ***Reference re Prov. Electoral Boundaries (Sask.)*, [1991] 2 S.C.R. 158** ("*Carter*") at p 189: "reasonable persons applying the appropriate principles . . . could not have set [these] electoral boundaries".

3. Justice Dallas K Miller, Chair of the ABEBC, was clearly deeply concerned that the Legislative Assembly of Alberta (the "legislature") may adopt the ABEBC Minority Report. Accordingly, he added an Addendum to the ABEBC Majority Report (the "Addendum"). He was the only one of the five commissioners to agree to the contents of the Addendum. He provided a "Recommendation 5" wherein he recommended that, if the legislature could not accept the ABEBC Majority Report because it eliminated two rural electoral divisions, the size of the legislature be expanded by an additional two seats to 91, such that no rural electoral divisions would need to be removed. Given the obvious partisan implications of the restoration of the two rural electoral divisions, he imposed strict conditions on their restoration to stem further boundary changes that may create partisan advantage, notably by prohibiting "impact on any electoral division in Airdrie or containing territory south of Airdrie's southernmost border".

4. The warnings from the ABEBC majority succeeded in dissuading the legislature from adopting the ABEBC Minority Report. The Legislature subsequently passed Motion 37, establishing a Select Special Committee on Electoral Boundaries (the "Committee"). This in turn created this Independent Advisory Panel (the "Panel" or the "IAP") to provide advice on how to set electoral boundaries that implement Recommendation 5, "subject to any modifications [the Panel] considers necessary, taking into consideration the requirement for effective representation as guaranteed by the Canadian Charter of Rights and Freedoms".

5. In our view, this irregular process to restore the two rural electoral divisions is constitutionally acceptable so long as we stay within our strict mandate of implementing Recommendation 5, subject to modifications necessary to implement Recommendation 5's purpose. It is commendable that the legislature created this Independent Advisory Panel to help ensure that politicians are not choosing their own voters.

6. Two rural electoral divisions can be restored:

   a) Lac Ste. Anne (a successor electoral division to Lac Ste. Anne-Parkland); and
   b) Rocky Mountain House-Sundre (a successor electoral division to Rimbey-Rocky Mountain House-Sundre), receiving protection pursuant to s 15(2) of the *Act*.

   Restoration of these two electoral divisions not only results in effective representation for these areas, but also improves effective representation for South Edmonton. The cascading consequences outside of Edmonton do not extend to any electoral division containing territory south of Airdrie's southernmost border, with the exceptions of Drumheller-Stettler and, to a very modest extent affecting fewer than 1,000 individuals, Canmore-Banff. This adheres to the strict non-partisan terms that Justice Miller imposed in Recommendation 5. Only 14 non-Edmonton[1] electoral divisions from the ABEBC Majority Report need be affected by the restoration of these two electoral divisions. All fourteen of these electoral divisions provide more effective representation than what was proposed in the ABEBC Majority Report. Many of them are more similar to the current electoral divisions, which preserves the *status quo*.

7. We appreciate that our fellow panelists have approached this process in good faith, and are grateful that we have unanimously agreed on the maps of the vast majority of the 91 electoral divisions. Our reasoning nonetheless differs significantly so we feel compelled to write separately.

8. The majority of this panel has interpreted the Panel's mandate to extend beyond the restoration of the two rural electoral divisions. Our colleagues are of the view that the Panel can suggest other changes that are "necessary" to facilitate effective representation. We disagree that it is even in the Panel's purview to be making recommended revisions to electoral divisions proposed by the ABEBC's Majority Report that are unrelated to the restoration of Lac Ste. Anne and Rocky Mountain House-Sundre. However, even if the ambiguous Motion 37 is interpreted broadly, there is still a standard of "necessity". In other words, the fact that an alternative map would also achieve effective representation in a different way is insufficient to permit the Panel to depart from the ABEBC Majority Report. Only if the change is ***necessary*** to achieve effective representation may the Panel do so. This is a high standard that the Panel must interpret in good faith. This process is not a do-over or a chance to correct perceived errors by the ABEBC Majority. Our colleagues disagree and significantly rework the Commission Majority's boundaries in Calgary and Southern Alberta.

9. Our colleagues propose moving South Springbank to Calgary-West-Elbow Valley, North Springbank to Calgary-Bow, and Bearspaw Village to Calgary-North West. To be sure, these maps of Calgary, unlike those proposed by the ABEBC Minority Report, would likely provide the constitutional minimum assurance of effective representation. However, they still subtly dilute the votes of Calgarians in ways that are unnecessary to achieve effective representation. Moreover, the conclusion that they are necessary to achieve effective representation is a collateral attack on the ABEBC Majority Report. We have similar concerns with respect to possible changes to Calgary-Confluence, Calgary-Cross, Calgary-East, and Calgary-Klein.

10. Our colleagues further recommend changes to several electoral divisions in the south and southwest of the province. They have removed one of Lethbridge's urban electoral divisions and added a new mostly

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1 Everyone has accepted Justice Miller's prescribed map of Edmonton, while adding Nisku to a new "Edmonton-Nisku" in the city's southeast.

rural electoral division. This has significant cascading consequences, including forcing Diamond Valley into being in an electoral division with Banff and Canmore. These changes not only do not facilitate effective representation, but actively undermine it. They have ignored the overwhelming desire of Lethbridge residents to have two mostly urban electoral divisions. They have systematically diluted the weight of Lethbridge residents by unnecessarily placing them in electoral divisions that extend for hundreds of kilometres. With respect, these maps of the Lethbridge area are beyond any reasonable exercise of this Panel's mandate.

II) Brief Summary on the Facts, the Law, and Ability to Respond to Our Colleagues

11. Except as indicated below, this minority report relies upon the ABEBC Majority Report for its statements regarding the law, the facts, and the summary of the submissions that the ABEBC heard as it conducted its work in 2025-2026. We are very familiar with the report, the facts, the law, and the submissions. We make further statements regarding the law and the submissions in this Report only to buttress our recommendations. This report must be understood, in many ways, as a coda to the ABEBC Majority Report. It is not possible to understand our Report without first reading the ABEBC Majority Report. We essentially view this Panel's work as a continuation and completion of the ABEBC's work.

12. We have reviewed the Panel Majority's rationales for all proposed changes to electoral divisions from the ABEBC majority report. We have further reviewed a draft of the Majority's analysis of this Panel's mandate and its Executive Summary. We have been unable to review other parts of the Majority's opinion, as the Majority was unable to provide them to us in advance for us to be able to do so. This is not a criticism of the Chair, who took on an enormous task when almost no one else was willing to do so. Moreover, as a result of our deliberations, we consider ourselves to have a good understanding of the Panel Majority's rationale and philosophy.

13. However, we are not absolutely certain what our colleagues' opinions are. We therefore hedge somewhat throughout this IAP Minority Report. It is our understanding that the IAP Majority:

    a) considers this Panel's mandate to extend beyond restoration of the two rural electoral divisions;
    b) supports changes from the ABEBC Majority Report to include the communities of Bearspaw and Springbank in West Calgary electoral divisions;
    c) supports the Committee considering changes confined to the four Calgary electoral divisions of Calgary-Confluence, Calgary-Cross, Calgary-East, and Calgary-Klein; and
    d) supports changes to approximately eight electoral divisions in the south and southwest of the province, which have cascading impacts as far north as Banff and Wheatland County.

    We regret that we have been unable to confirm all of these details. However, we are confident that our fundamental philosophy and opinion stand even if we are mistaken about some of these details.

14. We also note that the IAP Majority discusses at considerable length how the ***next*** redistribution should proceed. We disagree strongly with these portions of the IAP Majority Report. But, in the interests of being as concise as possible, we do not respond here.

III) This Process is Constitutionally Irregular, But Constitutionally Permissible

15. In *Carter*, Justice McLachlin, for a majority of the Supreme Court of Canada, declined to hold that an independent process is constitutionally required to draw electoral boundaries.

16. Justice Cory put greater emphasis on the importance of an independent and unconstrained process. We discuss below whether a court in 2026 would be more amenable to his position. However, it is not our role to query a majority decision of the Supreme Court of Canada.

17. More generally, we recognize that non-independent, irregular processes have been constitutionally permitted in the past. The reasons have varied, but have included:

    a) the Parliament of Canada unanimously agreeing that an electoral division ought not to be removed from Quebec at the last federal redistribution: *Preserving Provincial Representation in the House of Commons Act*, SC 2022, c 6;
    b) the National Assembly agreeing to change the number of electoral divisions from 125 to 127 after Quebec's independent commission recommended the removal of a seat from Montreal and a seat from the Gaspésie: Bill 3, *Act to ensure effective representation of electors*;
    c) Ontario freezing its Northern Ontario boundaries as they were in the 1990s: *Representation Act, 2005*, SO 2005, c 35, Sched 1, save for the Far North, where representation has been expanded: *Representation Statute Law Amendment Act, 2017*, SO 2017, c 18; and
    d) Various irregular processes in Nova Scotia concerning districts preserving Acadian and Nova Scotia Black representation, some of which have been mandated by the courts: ***Reference re the Final Report of the Electoral Boundaries Commission*, 2017 NSCA 10** ("*Nova Scotia Reference*"); ***Fédération Acadienne de la Nouvelle-Écosse et al v Nova Scotia (Attorney General)*, 2024 NSSC 339** ("*Fédération Acadienne*").

18. If there is a common thread through these processes, it is that particular areas of a province, or populations therein, have unique representational needs. Realizing those needs requires some departure from the typical redistribution process. We nonetheless observe that these irregular processes of redistricting have typically been confined to particular areas of a province. There is no precedent for the redrawing of the entirety of a province after an independent commission has completed that task in at least the past three decades of Canadian history. As the *Nova Scotia Reference* in particular notes, interference in an independent redistricting process is constitutionally perilous.

19. We recognize that none of the aforementioned processes we cite is precisely analogous to the one in which we are participating. A court may disagree with our concession about the constitutionality of this process. We are strengthened in our conclusions by the fact that we are an arm's-length panel (if admittedly not an independent commission) tasked to implement specific directions of the judge who chaired the ABEBC. We have also been able to review all written and oral submissions made by thousands of Albertans and received by the ABEBC in its independent process. This heavily constrains our irregular mandate.

20. We recognize that there is some ambiguity about the Panel's mandate, but it certainly includes providing advice on the appropriate boundaries to restore the two rural electoral divisions. We address that first before returning to the more expansive interpretation of the Panel mandate made by our colleagues.

IV) How to Restore the Two Rural Electoral Divisions

A) Lac Ste. Anne

21. One of the two rural electoral divisions removed by the Majority Report, which Justice Miller suggested could be restored, is Lac Ste. Anne-Parkland. The Panel unanimously proposes a successor electoral division of "Lac Ste. Anne", mostly consisting of:

    a) the Town of Stony Plain;
    b) all of Lac Ste. Anne County;
    c) the three Treaty 6 reserves previously in Lac Ste. Anne-Parkland; and
    d) the most northern portions of Parkland County as demonstrated on the IAP Majority map.

22. This is a coherent electoral division west and north of Edmonton, bringing together large parts of Treaty 6 territory. There are clear transportation routes that run throughout it travelling northwest of Edmonton. The electoral division has a reasonable population. Three Treaty 6 reserves that the ABEBC Majority Report divided are reunited. Effective representation will be achieved.

23. As a result of this restoration of Lac Ste. Anne, Barrhead-Westlock-Athabasca can return to borders much closer to the *status quo*, though exchanging some territory with Cold Lake-Bonnyville-St. Paul for reasons outlined in the Interim Report. It has lost territory to Lesser Slave Lake, in recognition of MLA van Dijken's concern about representing too many counties. The Panel does not propose changing Lesser Slave Lake back to its current borders, consistent with Justice Miller's instructions to preserve the ABEBC Majority Map to the extent possible. Barrhead-Westlock-Athabasca has accordingly become smaller and more compact. This will increase effective representation, and mitigates the MLA's concerns with representing too many municipalities across too vast a geographic distance.

24. Because of these changes, Smoky Lake County can leave Fort McMurray-Lac La Biche. This means that the electoral divisions of Fort McMurray-Lac La Biche and Fort McMurray-Wood Buffalo can return to the same borders as the 2017 redistribution and as outlined in the ABEBC Interim Report. This restoration of the *status quo* reduces the population in these vast rural areas. This increases effective representation for these areas and minimizes disruptions to the *status quo*. We are not certain the IAP Majority agrees with restoring the boundaries of Fort McMurray-Wood Buffalo.

25. Another result of the recreation of the Lac Ste. Anne electoral division is the reduction in the size of St. Albert-Sturgeon, by keeping Alexander First Nation in Lac Ste. Anne. This will facilitate effective representation. The electoral division now includes the northeastern corner of St. Albert and the other parts of Sturgeon County outside Alexander First Nation. The Panel unanimously proposes that this electoral division be renamed Morinville-Sturgeon. The low population of Morinville-Sturgeon is justified by the high population growth in this area. This population growth is already significant and the possible development of Meta's artificial intelligence data centre will likely increase that. Despite the gap in population, we do not propose readjusting the border with St. Albert. The imbalance in population with St. Albert is justified to keep as much of the City of St. Albert in a single electoral division as possible (in line with several submissions), and to follow Justice Miller's instructions to preserve the ABEBC Majority Report's map to the extent possible.

26. Because Stony Plain and portions of Parkland County have been removed from Stony Plain-Drayton Valley, Drayton Valley-Devon can be recreated, with its border extending all the way east to Highway 2. Highway 2 is a logical border. This electoral division is also closer to the *status quo*, with clear transportation links between its two largest municipalities.

27. As a result of these changes, Spruce Grove electoral division becomes smaller, concentrating on the city and rural areas immediately around it. This is eminently justifiable given the exceptional growth in the area.

28. The collapse of Lac Ste. Anne-Parkland forced Leduc into an electoral division with Devon. This no longer being necessary, Leduc-Beaumont can be recreated, which was the overwhelming desire of residents of both Leduc and Beaumont. In any event, Beaumont leaving Edmonton was a term of Recommendation 5, which we have been tasked to incorporate. The Panel considers the high population justified given the extensive public desire for this and clear shared interests between Leduc and Beaumont. We are reluctant to condone populations nearly 20% above the provincial average, for reasons discussed below. However, unlike other areas where the ABEBC Minority Report submitted that populations should exceed the provincial average by significant amounts, ***the residents of Leduc and Beaumont have overwhelmingly asked to be paired in the same electoral division***. This overwhelming desire, despite the dilution of the votes of residents, indicates that this pairing truly is the best way to achieve effective representation. These cities south of Edmonton have a distinct non-Edmonton feel, meaning that effective representation, and the links between the cities, warrants their being in the same electoral division.

29. To prevent the population of Leduc-Beaumont being too high, the Panel recommends the creation of an "Edmonton-Nisku", consisting of: a) Edmonton-South East as outlined in the Interim Report; and b) Nisku and surrounding rural areas north of Leduc/Airport Road, east of Edmonton International Airport/Highway 2, and west of Beaumont's western border. Everything else south of the North Saskatchewan River in Edmonton can thus revert to the map outlined in the ABEBC Interim Report. This is part of the terms of implementing Recommendation 5. This is a better map of Edmonton, as electoral divisions become smaller. The electoral divisions further follow major roadways and waterways more logically. In particular, it does not become necessary for any electoral division to cross Gateway Boulevard, which is a major divider of communities in South Edmonton. Edmonton-Whitemud can further remain entirely north of Anthony Henday Drive, which is also a major divider in this area of Edmonton.

30. Finally, because of the restoration of Lac Ste. Anne, West Yellowhead can lose all portions of Lac Ste. Anne County to become a smaller electoral division more similar to its current *status quo*.

31. In sum, the creation of Lac Ste. Anne electoral division is constitutional in substance as well as in process. It improves effective representation for Edmonton and the rural areas near it. If a court, at a future date, holds that this process is unconstitutional for offending s 3 of the *Charter*, the Panel would urge the court to hold that this creation of Lac Ste. Anne (and the aforementioned cascading effects) is a reasonable limit on s 3, justifying a map of 90 electoral divisions. Several pressing and substantial objectives are served by this electoral division's creation:

    a. Preserving rural representation;
    b. Preserving Indigenous representation;
    c. Being fair to Lac Ste. Anne-Parkland, whose residents were not consulted about their electoral division being removed; and

d. Making the electoral divisions in Edmonton more coherent.

32. Creation of this electoral division does not unduly dilute urban representation. Indeed, it enhances Edmonton representation to a significant extent. There is also no other reasonable way to achieve these objectives—unless the map of the entire province is to be adjusted. Only 8 non-Edmonton electoral divisions are affected: Fort McMurray-Wood Buffalo, Fort McMurray-Lac La Biche, St. Albert-Sturgeon (which is renamed Morinville-Sturgeon), Barrhead-Westlock-Athabasca, Stony Plain-Drayton Valley (which becomes Drayton Valley-Devon), Spruce Grove, Leduc-Devon (which becomes Leduc-Beaumont), and West Yellowhead. This minimizes cascading impacts in accordance with Justice Miller's conditions.

B) Rocky Mountain House-Sundre

33. The Panel unanimously proposes the second restored electoral division be "Rocky Mountain House-Sundre", consisting mostly of:

a) The vast majority of Clearwater County;
b) The most western parts of Mountain View County including all of Sundre and Cremona and surrounding areas;
c) Portions of the MD of Bighorn presently in Rimbey-Rocky Mountain House-Sundre; and
d) Portions of the MD of Bighorn and Banff National Park north of the Bow River watershed.

34. This has impacts on only six other electoral divisions:

a) Mountain View-Kneehill (renamed *Olds-Didsbury-Three Hills*): loses the most western portions of Mountain View County, including Sundre and Cremona, so as to concentrate on its agricultural core in the Highway 2 corridor;
b) Lacombe-Clearwater (renamed *Lacombe-Sylvan Lake*): becomes all of the areas surrounding Sylvan Lake, most of Lacombe County, the City of Lacombe, the southeastern portions of Ponoka County, a small piece of Clearwater County, and the portions of Ponoka County immediately north of Gull Lake;
c) Wetaskiwin-Ponoka-Maskwacis (renamed *Wetaskiwin-Ponoka*): becomes all of Wetaskiwin County, and almost all of Ponoka County, save for discrete portions included in Lacombe-Sylvan Lake given the need for population balance and the desire to keep all Gull Lake communities together;
d) Drumheller-Stettler: loses portions of Lacombe County, which were an odd fit in this sprawling eastern electoral division;
e) Sylvan Lake-Innisfail (renamed *Blackfalds-Innisfail*): becomes most of Red Deer County, except the areas including and immediately around Sylvan Lake, while also including the areas immediately surrounding and including Blackfalds; and
f) Canmore-Banff: loses portions presently in Rimbey-Rocky Mountain House-Sundre and north of the Bow River watershed, which share more in common with the Eastern Slopes from transportation, cultural, and economic perspectives.

35. This reduces the populations of several rural electoral divisions and creates an electoral division with s 15(2) status. Rocky Mountain House-Sundre meets all of the legislative requirements for s 15(2) status: its large geography, distance to the legislature by road, size of its largest community, border with British

Columbia, and presence of the Big Horn, Sunchild, and O'Chiese Reserves. Moreover, the Panel acknowledges that the Eastern Slopes region does not fit neatly, from an economic and cultural perspective, with the Highway 2 corridor to its east, nor the National Parks to its west and south. Rocky Mountain House-Sundre complements neighbouring Canmore-Banff as both are unique areas of the province with s 15(2) protection. While Canmore-Banff has a significantly higher population than Rocky Mountain House-Sundre, the uniqueness of the regions is their commonality that warrants s 15(2) protection. Rocky Mountain House-Sundre in particular is vast, sprawling country in the Mountain Valley. Including the uninhabited portions of Banff National Park in Rocky Mountain House-Sundre may seem superficially odd, as it divides a national park. However, people who service this area live in adjacent portions of Clearwater County. While the Panel recognizes that others may disagree that this electoral division can be maintained in a map of only 91 electoral divisions, we nonetheless are of the view that it does not offend s 3 of the *Charter* given the unique circumstances in which this Panel arose. We do grant that it may be more difficult to justify this electoral division under s 1 of the *Charter* if a court were to disagree with the Panel concerning s 3: it may take a map of 93 or 95 electoral divisions before Rocky Mountain House-Sundre's restoration could be considered "minimally impairing" of the right to vote of urban Albertans. This electoral division's recreation reduces the populations of the electoral divisions in the Highway 2 corridor considerably. We nonetheless are of the view that s 3 is not limited at all, so we do not need to consider this issue concerning s 1.

36. While the Panel is of the view that "Rocky Mountain House-Sundre" is a simple and clear name for this electoral division, "Clearwater", "David Thompson", "Eastern Slopes", and "Ya Ha Tinda" may better evoke the spirit of this electoral division. The Panel is content to defer to the legislature's naming choice.

37. We, the IAP Minority, note that the IAP Majority also recommends including approximately 1,300 people in the City of Red Deer in the Blackfalds-Innisfail electoral division. We would not be raising concerns about this if it were our only concern with the IAP Majority's maps. However, we find this change to be unnecessary and ill-advised. It is challenging enough as a municipality or resident thereof to get an MLA's attention when the municipality is the primary part of an electoral division. Getting their attention and understanding of all the municipal issues to serve only a handful of residents, when there are already two other MLAs that have the primary relationship with this community, seems suboptimal to us.

38. The vast majority of the 91 electoral divisions that this Panel unanimously proposes are either the same as the ABEBC Majority Report, or the Interim Report. This preserves both the letter and the spirit of Recommendation 5.

V) Defining Our Mandate

39. We now turn to the question of whether this Panel has the mandate to advise on changes to Alberta's electoral map unrelated to the restoration of the two rural electoral divisions. It should go without saying that understanding our mandate is a crucial part of fulfilling our mandate.

A. Consequences of Exceeding Our Mandate

40. Our colleagues place little emphasis on the potential consequences of this Panel exceeding its mandate if our IAP Minority interpretation is correct. They believe that the conditions imposed by Justice Miller, which we discuss below, should not impede their judgment in drawing a map that in their view best

facilitates effective representation. Moreover, they emphasize the fact that this Panel is only advising the legislature to downplay the impacts of exceeding the Panel's mandate. In our view, this attitude to this Panel's mandate is wrong in itself and also constitutionally reckless.

41. The view is wrong in itself because it should be uncontroversial that those exercising delegated authority must act within the ambit of the delegation. This is a key element of the rule of law: ***Roncarelli v Duplessis*, [1959] SCR 121**. The mere fact that someone exercising delegated power can achieve a better policy outcome by acting outside their authority does not justify acting outside of their authority: ***Canada (Minister of Citizenship and Immigration) v Vavilov*, 2019 SCC 65** ["*Vavilov*"] at, *e.g.*, para 108.

42. Placing this objection in principle to the side, however, it is particularly reckless for a panel making recommendations concerning electoral boundaries to be acting outside its mandate. An indicium of a map that provides fair and effective representation is the process that created it. *Carter* made it clear that no particular process is required, and this has been repeatedly affirmed. However, this emphasis on process means that a substantively justifiable map (which our colleagues may have provided with respect to Calgary) will be tainted if the process that led to its creation was flawed: see, *e.g.*, the *Nova Scotia Reference*. Courts are rightly reluctant to conclude that particular maps fail to provide effective representation—but they have far fewer reservations about holding that a body exercising delegated authority exceeded the scope of the delegated power. The Panel exceeding its mandate decreases the legitimacy of the legislature relying on the Panel's advice—even vis-à-vis the unanimous advice that restores Lac Ste. Anne and Rocky Mountain House-Sundre[2] when tainted by our colleagues' proposed redraws of the Calgary and Lethbridge electoral divisions.

43. The consequences of our exceeding our mandate will not be an administrative law professor's pedantic screed—the consequences could be the legislature being constitutionally prohibited from relying on the IAP Majority's advice. There are accordingly asymmetrical consequences between accepting the IAP Majority's interpretation of the Panel's mandate, should they be incorrect, and accepting the IAP Minority interpretation of the Panel's mandate, should we turn out to be incorrect.

44. We elaborate in paragraphs 45-84 why we consider the IAP Majority to have unreasonably interpreted this Panel's mandate. This is more dense and legalistic than we would normally consider desirable in a report on electoral boundaries. But we consider it important in these unusual and irregular circumstances when there are such serious stakes and consequences to getting this wrong. Some readers may prefer to proceed to paragraph 85. In sum, we are of the opinion that:

a) This Panel's mandate to conduct a review and divide Alberta into 91 electoral divisions is qualified by Recommendation 5, which restricts ***how*** this Panel is to conduct that review and division;
b) Recommendation 5 mandates preserving the ABEBC Majority map to the extent possible, and prohibits making changes to "any electoral division in Airdrie or containing territory south of Airdrie's southernmost border, with the exception of Drumheller-Stettler";
c) While Motion 37 permits "necessary" changes to Recommendation 5, based on various principles of legislative interpretation, we interpret this to mean "necessary" to fulfill Recommendation 5's purpose of restoring two rural electoral divisions; and

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[2] Our concerns about the border between Red Deer-South and Blackfalds-Innisfail should not doom the restoration of Rocky Mountain House-Sundre.

d) Even if we are wrong about "c)", any changes unrelated to the restoration of the two rural electoral divisions must be "necessary" to achieve effective representation.

B. The Centrality of Recommendation 5

45. The mandate for this Panel comes from Motion 37. In operative part, Motion 37 reads:

> (e) the independent advisory panel's mandate is to
>
> (i) **conduct a review of the electoral boundaries of Alberta** and make proposals as to the area, boundaries and names of the electoral divisions of Alberta.
>
> (ii) in conducting its review,
>
> (A) divide the electoral boundaries of Alberta into 91 proposed electoral divisions
>
> (B) ***incorporate the recommendations provided in Recommendation 5* in the Addendum to the Majority Report *subject to any modifications the independent advisory panel considers necessary*, taking into consideration the requirement for effective representation as guaranteed by the Canadian Charter of Rights and Freedoms** […] [emphases added]

46. Our colleagues have suggested that paragraphs (e)(i) and (e)(ii)(A) permit revisions to any electoral division. The IAP Majority suggests that, in conducting a "review" of all electoral boundaries, they may find areas for improvement, thereby permitting recommending changes to any electoral division. The IAP Majority further suggests that the "independent" status of this advisory panel may mean that the Panel must conduct "*ab initio*" review.

47. Had this been the legislature's intention, paragraph (e)(ii)(B) would have been superfluous. The legislature does not speak in vain: see, *e.g.*, ***McDiarmid Lumber Ltd v God's Lake First Nation*, 2006 SCC 58**, at para 36. Accordingly, we must analyze Paragraph (e)(ii)(B), which clearly ***qualifies*** the manner in which the Panel is to conduct a review of the electoral boundaries of Alberta and divide the electoral boundaries into 91 proposed electoral divisions. The preface to paragraph (e)(ii) makes this clear. As we will explain, the mandate to incorporate Recommendation 5 heavily constrains the manner in which our review of all electoral divisions can be accomplished.

48. Paragraph (e)(ii)(B) instructs the Panel that the Panel is to "incorporate the recommendations provided in Recommendation 5 in the Addendum to the Majority Report". The IAP Majority is correct to observe that Recommendation 5 had no legal effect on its own. It is still not binding on the legislature. But it has now become binding upon this Panel as a result of Motion 37. Though this Panel is technically a body of the legislature, it is functionally exercising delegated authority and must therefore act within the scope of the delegation. The administrative law rule about ensuring that delegated power is consistent with the grant of authority applies across the law, including corporate law, agency law, *etc.* It is equally illegitimate for this Panel to be acting beyond the scope of its delegated authority.

49. The IAP Majority suggests that our interpretation of the impacts of paragraph (e)(ii)(B) renders paragraph (e)(i) nugatory because it would prevent our reviewing, and thereby recommending improvements to, any electoral division. However, a review need not have the consequence of change. A review, which is necessary to produce 91 maps, may specify that certain electoral divisions are to be maintained as another

body has drawn them. Motion 37's preamble acknowledged that Justice Miller prescribed restrictions on the restoration of the two rural electoral divisions.

50. The mandate to incorporate Recommendation 5 was included by the legislature ***to guide the review***. It would have been redundant to include this if the review could lead to changes more generally, especially in the context of maintaining electoral integrity. Very recently, in ***Sinclair-Desgagné v Canada (Chief Electoral Officer)*, 2026 SCC 31** ("*Sinclair-Desgagné*") at para 43, Justice Jamal interpreted legislation concerning election irregularities. He underscored the importance of avoiding interpretations that would render the legislature's words surplusage, especially when electoral fairness is at issue. It is possible to conduct a review of the electoral boundaries of Alberta and, in doing so, adopt the ABEBC Majority maps without recommending changes south of Airdrie. However, it is impossible to incorporate Recommendation 5 while also recommending changes to the ABEBC Majority maps to electoral divisions south of Airdrie. Accordingly, our interpretation of Motion 37 is the only coherent reading of this Panel's mandate. As we discuss below, it is to be assumed that legal mandates are coherent. The IAP Majority's interpretation of the mandate—that we are to incorporate Recommendation 5 but can also recommend changes to electoral divisions south of Airdrie—is, respectfully, incoherent.

51. Incorporating the recommendations provided in Recommendation 5 is the operative clause of paragraph (e)(ii)(B). We will return to the qualifying clauses below. A thorough legal interpretation of Recommendation 5, which has been incorporated as the heart of the legislative motion, is going to first be necessary. This will demonstrate that we cannot both "incorporate Recommendation 5" in our review and also make recommendations to changes to electoral divisions south of Airdrie.

C. Interpreting Recommendation 5

52. Justice Miller's Recommendation 5, which this Panel has been tasked to implement, was clear that the restoration of the two rural electoral divisions must preserve the ABEBC Majority map of the rest of the province to the extent possible. Specifically, he wrote:

> In the circumstance that the Legislative Assembly of Alberta finds that it cannot concur in the proposals of the majority of the Electoral Boundaries Commission in its final report to remove two electoral divisions from areas outside of the Cities of Edmonton and Calgary, the majority of the Commission recommends that the Assembly make amendments to the *Electoral Divisions Act*, increasing the number of electoral divisions from 89 to 91 for the next general election, and **restore the two electoral divisions that this Commission has removed. The rest of the province as we propose must be maintained to the extent possible**. This would need to be studied by an all-party Select Special Committee or other equivalent Legislative Committee in accordance with its Standing Orders. However, restoration of the two electoral divisions should:
>
> a) **have no impact on any electoral division in Airdrie or containing territory south of Airdrie's southernmost border**, with the exception of Drumheller-Stettler;
> b) have no impact on any electoral division north of the North Saskatchewan River in Edmonton;
> c) result in all electoral divisions south of the North Saskatchewan River in Edmonton reverting to the map outlined in the interim report, with the possible exception of including Nisku in Edmonton-South East if the all-party committee wishes to restore Leduc and Beaumont being in the same electoral division; and

d) consider restoring an electoral division mostly consisting of Clearwater County and western Mountain View County as an electoral division with s. 15(2) status under the Act. [Emphasis added.]

53. It is notable that Justice Miller imposed significant conditions on the restoration of the two rural electoral divisions. We suggest the purpose of his conditions was obvious: to preserve the work of an independent commission that completed extensive public consultations, avoid re-litigation of issues the ABEBC has decided, and prevent unconstitutional dilution of urban votes. We have shown above that it is possible to achieve this by affecting only 14 non-Edmonton electoral divisions,[3] and no electoral divisions in Lethbridge or Calgary.

54. We also note that his conditions are markedly ***non-partisan***. From a purposive analysis, Justice Miller clearly sought to impose terms on the restoration of the two rural electoral divisions that would prevent inappropriate partisan gamesmanship. While giving the legislature some flexibility, he protected most of the ABEBC's work in revising the province's 89 electoral divisions. This maximizes the extent to which an independent commission drew the electoral boundaries and prevents a reoccurrence of the ABEBC Minority Report. As Professor Sigalet has noted for the Macdonald-Laurier Institute, the partisan implications of following the plain meaning of Justice Miller's conditions are undeniable insofar as he recommends restoring two rural electoral divisions. But they are also confined to the restoration of two rural electoral divisions and attenuated by mandating that Beaumont leave Edmonton: see Geoffrey Sigalet, "Lines, power, and trust – Inside Alberta's electoral boundaries fight" *Inside Policy* (4 May 2026), online: <url=https://macdonaldlaurier.ca/lines-power-and-trust-inside-albertas-electoral-boundaries-fight-geoffrey-sigalet-for-inside-policy/>.

55. However, our colleagues propose further changes that, though discrete, could have extraordinarily consequential partisan implications. Presumably, the clear but minimal partisan implications of the restoration of the two electoral divisions ***on his specific conditions*** are why Justice Miller recommended that an all-party committee study this process. An all-party committee, where the government has a majority of the membership, would normally not be an acceptable way to draw electoral divisions given the risks of partisan gamesmanship.

56. Justice Miller's Addendum prohibited making any changes to electoral divisions "in Airdrie or containing territory south of Airdrie's southernmost border, with the exception of Drumheller-Stettler". Presumably, he made Drumheller-Stettler an exception to his general rule because the cascading consequences of creating Rocky Mountain House-Sundre would enable parts of Lacombe County to leave Drumheller-Stettler. In other words, he was practical. It goes without saying, however, that Calgary and Lethbridge—which are where Alberta's most competitive electoral divisions are disproportionately found at present—are south of Airdrie. His conditions prevent further gamesmanship concerning these electoral divisions.

57. We acknowledge that the Panel unanimously recommends moving small portions of MD of Bighorn and Banff National Park from Canmore-Banff to Rocky Mountain House-Sundre, which is technically also outside Justice Miller's strict conditions. However, this allows portions of the current electoral division of Rimbey-Rocky Mountain House-Sundre to stay united. This also has no material partisan implications because it affects fewer than 1,000 residents. It further buttresses the ability of s 15(2) to protect Rocky

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[3] Edmonton electoral divisions should be non-controversial in this process, as Justice Miller prescribed a precise map of Edmonton but for the Nisku issue, which we addressed above.

Mountain House-Sundre. Though it technically violates condition (a) of Recommendation 5, it clearly falls within the spirit, and is in fact helpful to achieve condition (d). As we will come to below, this is precisely the type of change sensibly permitted to Recommendation 5 by the subsequent clauses in Motion 37's paragraph (e)(ii)(B).

D. The Penultimate Paragraph of the Addendum is Not Part of Recommendation 5

58. This Panel has been tasked to incorporate Recommendation 5, which is found in the Addendum. We have not been tasked to incorporate everything in the Addendum. On the top of Page 67 of the Addendum, Justice Miller muses that further hybrids in Calgary and Lethbridge were not unreasonable:

> In addition, I wish to clarify that I do not consider all of the minority's hybrids to be unreasonable, even the ones the majority did not adopt. We did not adopt the hybridization of Bearspaw or Springbank with Calgary, nor the extent of the hybridization of Lethbridge, for reasons explained elsewhere in this report. However, I do not consider those hybrids necessarily unreasonable or procedurally unfair, given the extensive submissions about them. Indeed, had the minority chosen to advocate for them, instead of insisting upon an otherwise unreasonable and unconstitutional map, I may well have agreed with them. This is unlike the other hybrids the minority has proposed in Airdrie, Calgary, Chestermere, Cochrane, Red Deer, and St. Albert. The minority's radical about face and substantive unreasonableness regarding these hybrids, to say nothing about the many other administrative and constitutional law problems with their report, is not something that I can condone. This is a reason I have found myself writing this Addendum.
>
> Lest there be any confusion about this issue, my writing this Addendum in no way detracts from the majority report representing the views of a majority of the Commission.

These musings, though interesting, are clearly not part of Recommendation 5 and, accordingly, not part of our mandate. They appear to be "*obiter dicta*": that is, a judge's non-binding observations made in passing. This is consistent with the government caucus copying Recommendation 5 on its website, ending at the end of Justice Miller's conditions:

- Recommendation 5 on page 66 of the 2025-2026 Alberta Electoral Boundaries Commission Report states:

> *In the circumstance that the Legislative Assembly of Alberta finds that it cannot concur in the proposals of the majority of the Electoral Boundaries Commission in its final report to remove two electoral divisions from areas outside of the Cities of Edmonton and Calgary, the majority of the Commission recommends that the Assembly make amendments to the Electoral Divisions Act, increasing the number of electoral divisions from 89 to 91 for the next general election, and restore the two electoral divisions that this Commission has removed. The rest of the province as we propose must be maintained to the extent possible. This would need to be studied by an all-party Select Special Committee or other equivalent Legislative Committee in accordance with its Standing Orders. However, restoration of the two electoral divisions should:*
>
> *a) have no impact on any electoral division in Airdrie or containing territory south of Airdrie's southernmost border, with the exception of Drumheller-Stettler;*
>
> *b) have no impact on any electoral division north of the North Saskatchewan River in Edmonton;*
>
> *c) result in all electoral divisions south of the North Saskatchewan River in Edmonton reverting to the map outlined in the interim report, with the possible exception of including Nisku in Edmonton-South East if the all-party committee wishes to restore Leduc and Beaumont being in the same electoral division; and*
>
> *d) consider restoring an electoral division mostly consisting of Clearwater County and western Mountain View County as an electoral division with s. 15(2) status under the Act.*

59. Recommendation 5 must further be read in the context of Recommendations 1-4, each of which is formulated as a single paragraph. Indeed, it is clear that Justice Miller wished that Recommendation 5 had been agreed to by Mr. Clark and Ms. Samson, such that it could have appeared in the Majority Report. Reading the Addendum's penultimate paragraph as part of Recommendation 5 is not reading the ABEBC Majority Report as a whole. Clauses in statutes cannot be read in isolation: ***Rizzo & Rizzo Shoes Ltd (Re)*, [1998] 1 SCR 27**, noting importance of "harmonious" interpretation of statutes. Recommendation 5 has been incorporated into this Panel's mandate and principles of statutory interpretation should therefore apply to our interpreting it: see also *Vavilov* at paras 115-124.

60. Moreover, Justice Miller wrote that Drumheller-Stettler was to be the ***only*** exception to boundary amendments to an electoral division containing territory south of Airdrie. He would not have listed a single exception if he also condoned changes to Calgary and Lethbridge. The expression of one exception to a general rule is the exclusion of other exceptions to that general rule: see ***Canada v Loblaw Financial Holdings Inc*, 2021 SCC 51** at para 59, per Justice Côté (interpreting the *Income Tax Act*, but the principle is sound in different contexts, being another principle of statutory interpretation we must consider as per *Vavilov*). The government caucus seemed to understand that—as we discuss above at paragraph 58 and below at paragraph 80.

61. More generally, reading the penultimate paragraph as part of Recommendation 5 would destroy Justice Miller's purposes of restoring the two rural seats on as non-partisan terms as possible, and preserving the ABEBC Majority Report to the extent possible.

62. Interpreting the paragraph on the top of page 67 as non-binding musings is also the only way to render the Addendum coherent. Otherwise, Justice Miller would have been imposing restrictions on the restoration of the two rural electoral divisions and then immediately backing away from them. It is presumed that legal texts are meant to be coherent (see ***Murphy v Welsh; Stoddard v Watson*, [1993] 2 SCR 1069** at 1079, per Major J), so the paragraph on the top of page 67 must not be part of Recommendation 5.

63. Our interpretation is the only way to make sense of the purpose of the Addendum as a whole—textually and purposively. Our conclusion is strengthened by Justice Miller's final paragraph of the Addendum, where he emphasizes that "this Addendum in no way detracts from the majority report representing the views of a majority of the Commission"—again indicating his fidelity to the ABEBC Majority Report.

E. "Other Changes Necessary" Are Connected to Recommendation 5

64. Now that we have interpreted Recommendation 5, we must look at the rest of the clauses in Motion 37's paragraph (e)(ii)(B), which instruct that this Panel is to:

> incorporate the recommendations provided in Recommendation 5 in the Addendum to the Majority Report ***subject to any modifications the independent advisory panel considers necessary*, taking into consideration the requirement for effective representation as guaranteed by the Canadian Charter of Rights and Freedoms**.

The ability to make modifications from Recommendation 5 in paragraph (e)(ii)(B) would be surplusage if paragraphs (e)(i) and (e)(ii)(A) permitted any modification as part of this Panel's general review and division

of the province. This buttresses our conclusions above in Part V.B. But two key questions still follow: Does this provision permit us to make "modifications […] consider[ed] necessary" anywhere in the province? Or does the operative clause of the sentence indicate that they need to be ***necessary to implement Recommendation 5*** and its purpose of restoring the two rural electoral divisions?

65. The guidance provided by the legislature in Motion 37 could have been more direct on this point. While any change may be considered "necessary" from a certain viewpoint for effective representation, we find this interpretation of the mandate of this panel to be outcome driven and not supported by the language of Motion 37 or the context of the request for our advice. Had this been the legislature's intention, it could have stated it much more clearly. Instead, it passed a 42-word sentence. The heart of the sentence is incorporating Recommendation 5 and the restoration of the two rural electoral divisions. The "modifications […] consider[ed] necessary" can accordingly be read as part of an instruction to implement Recommendation 5 without perfectly strict adherence to Justice Miller's recommendations, rather than a standalone ability to advise on changes across the provincial electoral map.

66. What is an example of a modification to Recommendation 5 that is in fact necessary to implement Recommendation 5? We have already identified one: interpreting Justice Miller's conditions too strictly would have prevented including any portions of MD of Bighorn or Banff National Park in Rocky Mountain House-Sundre. This would have impeded the implementation of Recommendation 5 and the restoration of Rocky Mountain House-Sundre. Surely, a change to the conditions in Recommendation 5 can be made to implement Recommendation 5's purpose and goals. In our view, this is exactly what the legislature intended when passing Motion 37.

67. We must consider the text, context, and purpose of Motion 37 in interpreting it. As Justice Morley recently noted in ***Henriksen Estate (Re)*****, 2026 BCSC 1058**:

> [24] In any interpretative exercise, the court must look at the statute's text, its context and its purpose. That all three are part of the interpretative enterprise is universally acknowledged and is sometimes referred to as the "modern approach" to statutory interpretation, although it was arguably well-known to Pufendorf, Coke and Blackstone. But while the importance of all three is undisputed, exactly how they relate has become something of a controversy recently: see *Hunt v. Canada*, 2026 FCA 88 at paras. 10–13.
>
> [25] As Justice Stratas argues, it is important to recognize that when judges are interpreting a statute — as opposed to developing the common law or considering the statute's constitutionality — text must be the "anchor of the interpretative enterprise": *Quebec (Commission des droits de la personne et des droits de la jeunesse) v. Directrice de la protection de la jeunesse du CISSS A*, 2024 SCC 43 at para 24. That is because it is of the very nature of interpretation, as opposed to legislating, that it is about figuring out what the text means. Any discussion of what the law should be that is not anchored to the text is something other than interpretation.
>
> [26] **That does not imply that courts should take a literal approach to statutes that purports not to refer to the context in which the words appear or the purposes for which it could plausibly be said to have been enacted. Realistically, when humans try to understand what another person has said or written, they always use the context in which the speech or writing occurs and they always do so making assumptions of what the speaker or writer wanted to**

> **accomplish. The modern principle's injunction to always consider context and purpose just makes this process conscious and explicit.**
>
> [27] **Since a legislature is always trying to accomplish some public policy goal, it is therefore perfectly appropriate to consider what those policy goals might have been in trying to make sense of the words on the page.** However, in doing this, the judge is not trying to figure out what they think would best promote those goals, but what the legislature did for that purpose. And it is important to bear in mind that any actual legislation is a compromise between competing purposes [citations omitted; emphasis added].

68. In our view, six contextual and purposive clues support our interpretation that the Panel's ability to deviate from Recommendation 5 remains connected to the restoration of the two rural electoral divisions:

    1. it places us more firmly in constitutional waters;
    2. it better complies with *Charter* values;
    3. it better complies with the timeline and support granted to the Panel to complete its task;
    4. it mitigates the legislature's abrogation of common law procedural fairness;
    5. we would have expected clearer language to overcome the common law doctrines of collateral attack and abuse of process; and
    6. this is consistent with statements of the government caucus, Premier, and her Chief of Staff that were contemporaneous to the passing of Motion 37.

    While none of these are determinative on their own, we are comfortable taking them together to come to our interpretation of our mandate. We expand upon each of them below.

69. First, we are more comfortable with an interpretation of the Panel's mandate that is similar to previous constitutionally irregular but constitutionally condoned processes. Making further changes to Lethbridge and Calgary creates significant constitutional risk, as we discuss below. While the presumption of constitutionality is a secondary principle of statutory interpretation, it informs our analysis in the case of ambiguity: ***Piekut v Canada (National Revenue)*, 2025 SCC 13** at para 48. Accordingly, it is our view that the constitutionality of this Panel's mandate is linked to the content of that mandate.

70. The *Nova Scotia Reference* is informative in this regard. In that case, a minister's interference with the Commission deprived commissioners of their ability to truly grapple with and assess effective representation. By analogy, if this Panel, with our procedural limitations, interprets the legislature's motion as *carte blanche* to redraw any boundaries as the panelists see fit—as a do-over in select areas of the province—then where is the Commission's ability to consider the factors relevant to effective representation? The IAP Majority asserts that we should not be bound by the Commission's recommendations. Given that we are bound by Recommendation 5, we disagree. In any event, from the perspective of epistemic humility, it seems unreasonable that the IAP has a better understanding of the communities of interest than the ABEBC given the privileged and independent status of the ABEBC.

71. Second, as discussed in the ABEBC Majority Report, there may be a *Charter* value of an independent process in the drawing of electoral divisions: increasing the power of a legislative committee is difficult to reconcile with such a *Charter* value. *Charter* values are, of course, not determinative of how to exercise delegated authority: ***Commission scolaire francophone des Territoires du Nord-Ouest v Northwest***

***Territories (Education, Culture and Employment)*, 2023 SCC 31.** However, they support our interpretation that the Panel should not be needlessly reviewing the ABEBC's determinations.

72. Third, providing the Panel 4.5 months from the appointment of the panelists (compared to the nearly 12 months in which the ABEBC had a clear mandate to draw all 89 boundaries for the province) indicates that the legislature conceived of the Panel's mandate as narrower than the ABEBC. The legislature must have known that such a task would be difficult without extraordinary support. That cautions against a broad interpretation of the Panel's mandate, which would render inadequate the supports Motion 37 granted.

73. Fourth, a narrow interpretation of the Panel's mandate mitigates the legislative abrogation of procedural fairness that occurred through Motion 37. The ABEBC heard from hundreds of Albertans orally, and received over 1,000 written submissions. The Panel did none of that due to time constraints. Of course, procedural fairness considerations from ***Baker v Canada (Minister of Citizenship and Immigration)*, [1999] 2 SCR 817** can be overridden by the legislature—and indeed they have been by Motion 37's limiting the Panel holding any public hearings. But departures from common law duties of fairness must be interpreted strictly: see ***Knight v Indian Head School Division No 19*, [1990] 1 SCR 653**. This should caution against making drastic changes to the ABEBC Majority Report maps. Otherwise, this legislative abrogation of common law procedural fairness will be greater than necessary.

74. Fifth, this narrow interpretation of the Panel mandate minimizes common law problems regarding collateral attack. The IAP Majority implies that this Panel is a "do-over" of the ABEBC's determinations. We disagree. An independent commission has already rejected the arguments that the changes to Lethbridge and Calgary are necessary to achieve effective representation. It offends basic principles of procedural law to be re-raising these arguments afresh to a new body. Re-raising these arguments is contrary to efficiency and fairness, rationales that permeate the common law doctrine of *res judicata*: see Janet Walker, *et al*, *Civil Litigation*, 2d ed (Toronto: Irwin Law/University of Toronto Press, 2026) at 71-73. Relitigating these decisions unnecessarily increases this Panel's work and constitutes a poor use of public resources: see the decision of Justices Cromwell and Karakatsanis in ***Penner v Niagara (Regional Police Services Board)*, 2013 SCC 19** at para 46.

75. Unnecessarily revisiting these findings further restricts the public from participating after the public was able to participate in the ABEBC process, and improperly gives dissatisfied advocates of greater hybridization in these cities a second "bite at the cherry": see ***Danyluk v Ainsworth Technologies Inc*, 2001 SCC 44** ["*Danyluk*"] at para 18. This offends basic principles of fair play: one doesn't get a "do-over" if one is unhappy with a commission's recommendations by instead opting into a less independent, less consultative process. This Panel cannot act as an unofficial appellate body of the ABEBC's decisions and readjudicate them. Parties disappointed with the decisions of an administrative process are not allowed to try to make those arguments again before a subsequent body: *Danyluk*.

76. If the ABEBC's determinations declining to further hybridize Calgary and Lethbridge were truly unreasonable, the legislature could reject parts of the ABEBC Majority Report at its own constitutional risk. It has not yet clearly done so. Alternatively, they could be judicially reviewed in the Court of King's Bench, which is the proper procedure when electoral boundaries commissions' decisions are unreasonable: *Fédération Acadienne*.

77. We grant that the doctrines of issue estoppel and cause of action estoppel do not technically apply to this Panel's mandate. This is because the ABEBC was not, strictly speaking, an adjudicative process, nor are the same "parties" before the ABEBC and this Panel. However, the residual doctrines of collateral attack and abuse of process certainly can apply: ***Toronto (City) v CUPE, Local 79*, 2003 SCC 63**; ***Behn v Moulton Contracting Ltd*, 2013 SCC 26** at para 40. These are flexible doctrines designed to preserve the integrity of the administration of justice. Such integrity is certainly undermined by revisiting issues decided by an administrative process—decisions that have not been formally or properly challenged. Even though the ABEBC's recommendations were not legally binding in themselves, they are binding on this Panel given Recommendation 5. More importantly, the flexibility of the collateral attack/abuse of process doctrines is broad enough to prohibit a constitutionally irregular advisory panel from revisiting determinations of a constitutionally compliant, more consultative statutory commission.

78. Our colleagues contend that the legislature has already exercised its constitutional authority to ***directly*** attack the ABEBC Majority Report by creating this Panel. This would, in our view, require clearer legislative language. Clear legislative language is necessary to displace the common law, particularly when the stakes are (quasi-)constitutional. For example, in ***Lizotte v Aviva Insurance Company of Canada*, 2016 SCC 52**, Justice Gascon held that "The [Supreme] Court has therefore imposed strict requirements for the amendment or abrogation of certain fundamental common law rules" (para 57). He was addressing litigation privilege in that case, but concerns related to the administration of justice are also tremendously important common law rules.

79. Sixth and finally, contemporaneous statements from the Premier and her Chief of Staff support our, the IAP Minority, interpretation of Recommendation 5. The Premier made it very clear that she was proposing further expanding the size of the legislature to protect rural voices:

> [The new panel] **makes sure that Calgary and Edmonton**, which were high growth areas, **get their proper representation** but it also ensures that **rural is properly represented as well**:

She also said that she was following Justice Miller's "sound advice": The Canadian Press, "Danielle Smith defends upcoming government motion to reassess riding boundaries" *City News Everywhere* (18 April 2026), online: <url=https://edmonton.citynews.ca/2026/04/18/danielle-smith-defends-upcoming-government-motion-to-reassess-riding-boundaries/> (emphasis added).

80. In no way does she suggest that making changes to Calgary or Lethbridge would be part of this process. This is consistent with the MLA for Leduc-Beaumont stating, on behalf of the government caucus:

> to **address the concerns of the Commission**, our caucus has put forward a resolution that would establish a Select Special Committee of the Legislative Assembly to engage an independent panel of advisors to take the majority report of the Commission and **integrate Recommendation 5 of Justice Dallas Miller in his addendum to the majority report**. We believe this will ensure effective representation as guaranteed by the *Canadian Charter of Rights and Freedoms* [emphasis added].

The website on which this statement was made proceeded to state exactly what Recommendation 5 prescribed, including all of Justice Miller's conditions, as noted above at paragraph 58.

81. The Premier's Chief of Staff added on X: "**The UCP caucus's motion endorses the majority report and the addendum to it by the Chair, Justice Miller.**" If the government caucus endorsed the original ABEBC report, this Panel has no mandate to redraw urban electoral divisions in Lethbridge and Calgary. Were these statements disingenuous? We certainly hope not.

82. We grant that these contemporaneous statements to the adoption of Motion 37 are merely contextual clues as to the Panel's mandate, rather than strictly part of it. They must be treated with caution because it is the words of the legislature that matter rather than the subjective intentions of the legislators or their advisors. However, it is nonetheless appropriate to rely on such statements in cases of genuine ambiguity, especially where the legislature is purported to have ousted the common law. Justice Moldaver addressed a similar issue for a unanimous Supreme Court in ***Grant Thornton LLP v New Brunswick*, 2021 SCC 31** in response to an argument that the legislature had ousted the common law of discoverability. He wrote: "the Minister's statement can hardly be taken as evidencing the 'clear legislative language' needed to oust or limit the common law rule […] If anything, it demonstrates the opposite." Similar considerations are applicable here.

83. For the foregoing reasons, we are of the view that the text, context, and purpose of Motion 37 indicate that the Panel's mandate is fundamentally limited to making a proposal for 91 electoral divisions that restores the two rural electoral divisions and the other subsequent boundary changes necessary for those two restorations. As Justice Jamal noted last month for the Supreme Court in *Sinclair-Desgagné*, public confidence in the electoral system must guide the interpretation of legislation (and, by analogy, legislative motions) concerning electoral fairness. It is our view that the legislature has passed Motion 37 with electoral fairness in mind—indeed, this infuses all six contextual clues we identify. This is a general purpose that further supports our interpretation of this Panel's mandate. The consequences of our exceeding our mandate could be quite serious.

F. In the Alternative, "Necessary" to Comply with the *Charter* Remains A High Standard

84. Even if the Panel has the unprecedented mandate to consider ways to ensure effective representation beyond the protection of representation in discrete areas, the "necessary" condition applies to the constitutional guarantee of effective representation. In other words, any changes, beyond those necessary to implement Recommendation 5, must be constitutionally ***necessary***. Our colleagues, in our view, interpret the term "necessary" to essentially be synonymous with "preferable". Everyone knows that saying something is "necessary" is a higher standard than saying it is "preferable", much less "an alternative". Given the irregularity of the independent process and the Panel's procedural limitations (as compared to the ABEBC's timeline and resources), this is quite rightly a high threshold. The fact that the Panel must "consider" them necessary should not render this a purely subjective standard given the link to the *Charter*. The consequences of unreasonably interpreting this standard of "necessary" could also be quite serious.

VI) Why We Cannot Agree with the Proposed Changes to Calgary and Lethbridge

85. It is our position that this Panel's mandate renders the discussion of Calgary and Lethbridge beyond this Panel's mandate. For the sake of completeness, however, we indicate why we do not agree that these changes are "necessary" to achieve effective representation.

86. Our colleagues rest their recommendations for different boundaries in West/Northwest Calgary and southwest Alberta on two premises. The first is that the increased use of what is known as a "hybrid electoral division" is justified and appropriate for much of Lethbridge and the surrounding area. The second is that the concept of a "community of interest" can be used to justify the disassembly of recognizable and obvious communities for distant and disparate ones. We therefore consider it necessary to consider how so-called "hybrid electoral divisions" intersect with effective representation and redistricting more generally. We will return to the concept of "communities of interest" below.

A. Hybrid Electoral Divisions

87. In their IAP Majority Report, our colleagues accurately describe what a blended or "hybrid" electoral division is. We also agree that it is a tool that can be used, when it would grant effective representation, to provide for situations when it will ease the representation of people in more sparsely populated areas. Our colleagues say that using that type of electoral division in southwest Alberta is justified based on the extent of the current use of that tool and in keeping with the way it is used in other parts of the province. However, those justifications misunderstand and misdescribe the current use of hybrid electoral divisions in the ABEBC's majority report. They also ignore the most obvious analog to Lethbridge in the province—Red Deer—where hybrid electoral divisions are not in use.

88. Our colleagues discuss the number of "hybrid" electoral divisions in the province. However, a closer review of those classifications essentially reveals that this single categorization includes three different scenarios:

    1. Minor areas that are added to large city areas because they bear more in common with the city than surrounding rural areas;
    2. Mid-size cities with a population that is too large to accommodate a single electoral division but too small to accommodate two electoral divisions; and
    3. Small and mid-size cities with a population that is too small to justify a single electoral division and are combined with other communities.

    In our view, these are three very different types of hybrids. While all can be justified on the basis of providing more effective representation, ***why*** they do so differs for each type of hybrid. For Category 1, the hybrid provides a better community of interest and therefore better representation. For Categories 2 and 3, there is no choice but to use hybrids. Category 3 in particular obfuscates what hybridization tends to refer to when it has come up in legal proceedings and secondary literature. Our colleagues conflate these types of hybrids and the reasons for their use. This risks being misleading, especially because none of the three types of hybrids are analogous to Lethbridge.

1) Large City Electoral Divisions with a Small Add-On

89. The first type of "hybrid" electoral division consists of those that are part of one of Alberta's two largest cities that have had a small region added on to them. To illustrate, here are the electoral divisions that fall into this category by the Panel's unanimous agreement and a rough approximation of the distance outside the city boundaries that are incorporated into them.

Table 1. Hybrids with Large City Electoral Divisions

Electoral Division	**Approximate distance from city boundary to rural edge of electoral district**
Calgary-East	4 km
Calgary-Falconridge-Conrich	5 km
Calgary-Glenmore-Tsuut'ina	25 km
Calgary West-Elbow Valley	30 km
Edmonton-Enoch	8 km
Edmonton-Nisku	7 km

90. These electoral divisions in Table 1 are based on the rationale that areas such as Tsuut'ina Nation, Conrich, Prince of Peace, Elbow Valley, Nisku, and Enoch Cree Nation are functionally more integrated into the cities of Calgary and Edmonton than they are to surrounding rural regions.

91. Our colleagues further propose two additional hybrids of this nature. The first, Calgary-Bow-Springbank, will extend approximately 30 km from Calgary's western border and move the northern half of the community of Springbank in Rocky View County from the Cochrane-Springbank electoral division (as created by the ABEBC Majority, thus splitting Springbank, as the southern half of Springbank is to be moved to Calgary-West-Elbow Valley). The second, Calgary-North West, will extend 4 km from Calgary's border and shift the community of Bearspaw Village, also located in Rocky View County, into a Calgary electoral division. While we disagree that these changes are "necessary" to achieve effective representation, we accept that they bear some similarities to the six electoral divisions where we are unanimous.

92. For all eight of these electoral divisions (6 connected to Calgary, 2 connected to Edmonton), the rural populations added to the urban districts in the large cities are relatively small compared to the overall populations of the electoral divisions, such that urban representation (which is already a disproportionately small share of the legislature) is not diluted further.

93. We consider this a defensible approach to hybrid electoral divisions on the basis of communities of interest (which we unpack further below). To be frank, the one of us who has experience in municipal governance in the Calgary area is actually skeptical of this type of hybrid electoral division: people who choose to live outside the city usually have consciously chosen ***not*** to be part of the city. Government services are also offered in a very different way once one crosses the city border. Nonetheless, we (especially the law professor) do not deny that, in theory, this is a defensible approach to drawing electoral divisions. To use an obvious example, virtually everyone (except those opposed to any hybrid electoral divisions in Calgary and Edmonton) agreed that Enoch Cree Nation should be in an Edmonton electoral division, rather than an electoral division with Drayton Valley. Enoch Cree Nation is clearly more integrated in, and culturally akin to, Edmonton than Drayton Valley. The "choice" to live on reserve or in Edmonton is also disanalogous to the choice to live in Springbank instead of Calgary: ***Corbiere v Canada (Minister of Indian and Northern Affairs)*, [1999] 2 SCR 203**. The ability to create an Edmonton-Enoch thus illustrates the

desirability, at least in principle, of the permissibility of Edmonton and Calgary electoral divisions extending beyond the city boundary.

2) Mid-Size Cities Too Large for a Single Electoral Division, But Too Small for Two Electoral Divisions

94. The next group of electoral divisions that form "hybrids" are those that have populations that, in a single electoral division, would either exceed the 25% threshold from the average population of an electoral division, or would be so great that it is obviously unfair to have the population of those communities in a single electoral division. However, such cities are too small to form two electoral divisions on their own. The following table has the list of these electoral divisions (where we are agreed), the main city in their electoral division, and the 2024 population of the main community as listed by the Alberta Municipal Affairs official population estimates[4]:

Table 2. Hybrids with Mid-Size Cities

Electoral Division	**Main City**	**Population of Main City**
Airdrie-East	Airdrie	85,505
Airdrie-West	Airdrie	85,505
Fort McMurray-Lac La Biche	Fort McMurray[5]	83,467
Fort McMurray-Wood Buffalo	Fort McMurray[6]	83,467
Grande Prairie-Wapiti	Grande Prairie	70,385
Medicine Hat-Brooks	Medicine Hat	63,271
Medicine Hat-Cypress	Medicine Hat	63,271
Strathcona-Sherwood Park	Sherwood Park[7]	75,575
Morinville-Sturgeon	St. Albert	72,316

95. The population average for a 91 electoral division provincial electoral boundary map is 53,722 with a permissible range of +/- 25% or 40,292 to 67,153. As one can see, all of the above cities with the exception of Medicine Hat would be illegal to put in a single electoral division, and a Medicine Hat electoral division would be the most populous of all the electoral divisions proposed in the ABEBC majority report. Dividing any of these urban centres into two electoral divisions would either be smaller than the legally permissible size or make them right on the threshold of legality.

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4 This may not have perfect alignment with Elections Alberta's numbers, but we are confident that the figures are sufficiently similar such that our philosophy and reasoning remains sound.

5 As Fort McMurray is part of the Regional Municipality of Wood Buffalo, the Government of Alberta does not keep an official population record of "Fort McMurray". This figure is taken from the Regional Municipality of Wood Buffalo's 2025 census estimate of the urban population.

6 *Ibid.*

7 As Sherwood Park is part of the Regional Municipality of Strathcona County, the Government of Alberta does not keep an official population record of "Sherwood Park". This figure is taken from Strathcona County's 2024 population estimate of the urban population of Sherwood Park.

96. The solutions that Alberta commissions have proposed over the years for these cities vary depending on their particular circumstances. Morinville-Sturgeon and Grande Prairie-Wapiti take a small part of the urban centre and combine it with the neighbouring rural areas. Medicine Hat-Brooks, Medicine Hat-Cypress, Fort McMurray-Wood Buffalo, and Fort McMurray-Lac La Biche divide the populations of the urban centre relatively equitably and then attach them to large rural areas. The Airdrie electoral divisions are more similar to the large urban electoral divisions with the Airdrie population dominating the electoral divisions and the rural add-ons being rather small, with Airdrie-West only extending about 7 km from the Airdrie municipal limits and Airdrie-East only extending about 40 km from the Airdrie municipal limits.

97. All of these cities have negative population gaps compared to Lethbridge that are 20,000 people or more. This is an obvious reason to distinguish them from Lethbridge.

3) Small and Mid-Size Cities Too Small to Justify a Single Electoral Division

98. The last group of electoral divisions that are identified as "hybrid" are not truly "hybrid" electoral divisions at all. They are simply what takes place in all of the rest of the electoral divisions of cities with populations less than 40,292: communities that are geographically proximate and seem to have some shared interests are grouped together. Here are the electoral divisions with cities (and the large towns of Okotoks and Cochrane) along with the largest community and the population of the largest community:

Table 3. "Hybrids" with Small and Mid-size Cities

Electoral Division	**Largest Community**	**Population**
Camrose	Camrose	18,722
Chestermere-Strathmore	Chestermere	28,129
Cochrane	Cochrane	37,011
Cold Lake-Bonnyville-St. Paul	Cold Lake	15,661
Fort Saskatchewan-Vegreville	Fort Saskatchewan	29,857
Lacombe-Sylvan Lake	Sylvan Lake	16,275
Leduc-Beaumont	Leduc	36,060
Lloydminster-Wainwright	Lloydminster	19,739
Okotoks	Okotoks	30,405
Spruce Grove	Spruce Grove	38,985

Population counts mandate that these electoral divisions share areas with adjacent rural communities. We bear these three different types of hybrids in mind as we discuss our colleagues' proposed changes to West Calgary and Lethbridge.

B. The IAP Majority Inclusion of Springbank and Bearspaw in Calgary Electoral Divisions Is Not Necessary to Achieve Effective Representation and Risks Offending the *Charter*

99. Our colleagues' maps of Calgary are, unlike the ABEBC Minority maps of Calgary, a plausible set of boundaries that, from a substantive perspective, would normally achieve the constitutional minimum requirement of effective representation. However, the West Calgary maps subtly dilute Calgarians' votes in ways that are not necessary to achieve effective representation. This sits uncomfortably with Supreme Court of Canada and Alberta Court of Appeal precedent. Given that we are bound by such precedent, there is a real risk that the maps will be found unconstitutional, especially in the irregular circumstances in which this Panel's work is unfolding. We reach this conclusion somewhat reluctantly, because we are concerned about excessive constitutionalization of political matters. But we feel obliged to warn the legislature of the risks and perceived unfairness in this regard.

1) The IAP Majority's Maps Increase the Population of Calgary Electoral Divisions Despite the Reduction in Average Population of Electoral Divisions

100. By creating more hybrid electoral divisions in Calgary, the Panel Majority has increased the average population of Calgary electoral divisions. This is notwithstanding the fact that the average population per electoral division throughout the province has decreased as a result of the expansion of the legislature to 91 electoral divisions. The ABEBC Majority report proposed Calgary electoral divisions with an average population of 56,379, or 2.64% above the provincial average of 54,929. The Panel Majority changes raise the average population of Calgary electoral divisions to 56,726, or 5.59% above the provincial average of 53,722:

Table 4. Population Averages of Calgary Electoral Divisions

	ABEBC Majority Report	**IAP Majority**
Average Calgary ED Population	56,379	56,726
Average ED Population	54,929	53,722
Proportion Calgary ED Population exceeds Provincial Average	2.64%	5.59%

In order to incorporate these additional hybrid areas into Calgary, Calgary would need 1.5 more electoral divisions to match the provincial average population. That matching is, of course, not required. But, as we come to below, it is the most important factor in drawing electoral divisions. This inflation of the population of Calgary electoral divisions, despite the decrease in the average population of all other electoral divisions, requires justification.

101. In *Carter*, Justice McLachlin wrote at page 185:

> 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." [emphasis added]

102. Restoring the two rural electoral divisions can be practically done without diluting Calgarians' voter parity. The "practical impossibility" exception to a requirement of voter parity is accordingly inapplicable. As such, the only way these changes can be justified is if they provide ***more*** effective representation.

*2) The Changes Are Not **Necessary** to Achieve Effective Representation*

103. We have no doubt that there are residents of Bearspaw and Springbank that consider themselves part of a community of interest that includes parts of Calgary. Several Springbank residents wrote to that effect. If one is on either side of the border between Calgary and these communities, one does not necessarily know it, especially vis-à-vis Bearspaw Village. Residents of these communities receive many services in Calgary and travel along the same roads. Indeed, one of us (Kennedy) probably would have agreed to place these communities in Calgary electoral divisions in a map of 89 electoral divisions to soften the blow of the loss of rural electoral divisions.

104. However, we also have no doubt that many residents of Bearspaw and Springbank have consciously chosen not to live in Calgary, and desire that to be reflected in their representation. And in these particular circumstances, these changes should only be recommended if effective representation ***required*** that Springbank and Bearspaw be in Calgary electoral divisions. In our view, this is hardly a requirement. Rebecca Brown was the only resident of Bearspaw who wrote about this issue:

> I live in **Bearspaw, a rural area just outside Calgary**. I am participating because I believe that rural and urban boundaries should remain distinct and that **rural areas should remain connected to rural communities rather than being absorbed into urban ones.** I similarly believe that urban boundaries should remain urban, to reflect the population density and their differing needs. Rural areas are unique, they contain tight-knit communities where neighbors know each other and share a lifestyle that is fundamentally different from the urban experience. **Our priorities, such as agricultural land use, rural infrastructure, are very distinct from those of a city, or large town. Combining rural ridings with large cities such as Calgary, for example, will dilute our voice and make it harder to advocate for the needs that matter most to us**. Urban areas face challenges like transit expansion and dense housing, while, for example, **Bearspaw's concerns center more on keeping large industrial and retail from encroaching on too much of the land, ensuring density doesn't impact our infrastructure and protecting our water and lands from contamination. Keeping rural areas like Bearspaw aligned with other rural areas ensures effective representation and respects the principle of those communities**. [Emphasis added]

105. Ms. Brown is, of course, speaking only for herself. But holding that it is "necessary" to disregard this perspective and others like it in the name of effective representation strikes us as results-oriented and imbalanced. Bearspaw and Springbank remain in Rocky View County. Unlike Elbow Valley, which is integrated into Calgary's wastewater system (warranting the differential treatment between Elbow Valley and Bearspaw and Springbank), these communities receive few if any municipal services from Calgary. The residents of these areas pay significantly less property tax as a result of their living in Rocky View County rather than Calgary. The population density, income ranges and typical transportation options available all reflect residents who have chosen a country residential lifestyle and range of services that is vastly different from the choices and everyday lifestyles of the residents of Calgary neighbourhoods.

106. Even if we were to accept that effective representation requires Springbank to be in a Calgary electoral division, we find dividing it between Calgary-West and Calgary-Bow to be odd. This is the only way that the IAP Majority has been able to solve the population problem of adding Springbank to Calgary. This population problem was another reason for the ABEBC to treat Springbank differently than Elbow Valley. Dividing Springbank was never proposed to the ABEBC. We also note that Calgary-Bow extends as far east as the community of Bowness—which has a radically different culture and economic profile than Springbank.

107. Including Bearspaw Village in Calgary-North West is the most defensible change proposed by our colleagues. It has a certain logic to it given it is otherwise sharing an electoral division with Cochrane that is experiencing high population growth (which may attenuate our concerns about population) and the closeness of Bearspaw Village to Calgary. However, Bearspaw Village, though urban to some extent, is a distinct residential community with acreage infrastructure and independent utility systems. While it is adjacent to Calgary and closer to Calgary than Cochrane, there are aspects of life in Bearspaw Village that are more similar to Cochrane, as Ms. Brown observed.

108. Accordingly, it is our view that reasonable people can disagree about where these communities belong. Systematically increasing the populations of Calgary electoral divisions to place these areas in Calgary electoral divisions is accordingly not necessary to ensure effective representation. This also creates constitutional vulnerability given Justice McLachlin's holdings in *Carter* that population deviations can only be justified if they cause ***more*** effective representation or ***better*** governance. Returning to this Panel's mandate, under no reasonable definition of "necessary" can it be said to be "necessary" to include these communities in Calgary electoral divisions.

109. Alberta Court of Appeal precedent further supports the view that, whatever the merits for including Springbank and Bearspaw in Calgary in a map of 89 electoral divisions, this is weakened in a map of 91. Had these communities been included in Calgary electoral divisions in ABEBC Majority Report map of 89 electoral divisions, we could in turn see the non-city portions of Airdrie-East moving to other electoral divisions. This would have enabled a purely Airdrie seat (Airdrie-East), as well as a maintained, if oddly shaped, Airdrie-Cochrane. Accordingly, the use of hybrids would have eliminated the need for an Airdrie-West. This, in turn, would have saved one of the two rural electoral divisions that the ABEBC Majority Report removed. This clearly would not have been what the City of Airdrie wanted, however. And the populations of both Airdrie-East and Airdrie-Cochrane electoral divisions would have remained undesirably high given the growth in them. Nonetheless, this would have accorded with endorsement from the Court of Appeal that hybrid electoral divisions are constitutionally permissible to avoid the elimination of rural seats: ***Reference re: Order in Council 215/93 Respecting the Electoral Divisions Statutes Amendment Act*, 1994 ABCA 342** ("*1994 Reference*") at paras 71-74. However, we are not the first instance decision-maker and it is not our role to relitigate the ABEBC's holdings.

110. Moreover, the hypothetical in the preceding paragraph demonstrates how ***one*** rural electoral division could have been saved through the creative use of hybrid electoral divisions around Calgary. But—and this is the crucial point—one rural electoral division would still have been removed. ***The legislature has achieved its objective of saving rural seats entirely through increasing the legislature's size: increasing the population of Calgary electoral divisions through more hybrids is thus unwarranted.***

111. The *1994 Reference* held that there are three solutions to solve the problem of increased concentration of Alberta's population in urban centres:

    a) increasing the number of electoral divisions;
    b) moving rural electoral divisions to urban centres; and
    c) increasing the use of hybrids.

    The addition of two new electoral divisions means that the legislature has entirely solved the problem through "a)". Use of "c)" is accordingly unnecessary.

112. The population deviation caused by including Bearspaw and Springbank in Calgary is admittedly very small (about an additional 350 persons per Calgary electoral division). Coupled with their clear links to Calgary, it may seem persnickety for a court to strike down their inclusion, especially given the *obiter dicta* from Justice Miller. But it is nonetheless a real risk given the Panel's mandate and these unusual circumstances.

C. The Changes to Northeast and East Calgary Appear Unnecessary to Achieve Effective Representation

113. Very late in this Panel's mandate, the IAP Majority proposed that the Committee "consider" changes to four electoral divisions in Northeast and East Calgary: Calgary-Confluence, Calgary-Cross, Calgary-East, and Calgary-Klein. To repeat, we are of the view that this is beyond this Panel's mandate, being south of Airdrie and unconnected to the restoration of Lac Ste. Anne and Rocky Mountain House-Sundre. The IAP Majority writes that these changes may be advisable to keep the electoral divisions closer to the *status quo* and to reflect the locations of future population growth. However, the effect of these maps is to significantly increase the population disparity between these districts and between districts in Calgary overall. As we write elsewhere, high variations in populations between districts require compelling rationales based on improving effective representation. This is especially the case for districts within a single large urban municipality.

114. We find the rationale stated for these changes to fall short of such a compelling rationale. Our colleagues do not justify such a material departure from boundaries that create a more equal distribution of population as set out in the ABEBC Majority Report, and which is guaranteed to affect voter parity in the next election. The newly proposed boundaries for these four electoral divisions are also less rectangular and less clear than those in the ABEBC Majority Report, even if they are much more logical than the ABEBC Minority Report. Therefore, we do not support these proposed or suggested changes either. In any event, we are doubtful that they can be considered "necessary" to achieve effective representation.

D. The Changes to the Lethbridge Area Undermine Effective Representation for the Vast Majority of the Region's Residents

115. The changes to the south and southwest of the province that have been proposed by our colleagues undermine Lethbridge residents' right to effective representation. Not only did the ABEBC Majority Report not err in this respect, it reached the only defensible conclusion to achieve effective representation for the city—and, frankly, most of the rural areas—at this time. Our colleagues' approach with respect to Lethbridge is based on the premise that there are communities of interest that extend for hundreds of kilometres outside Lethbridge's boundaries: as far east as the County of 40 Mile, and further north than

the Siksika reserve. We find this premise highly questionable. Reliance on it reduces, instead of enhances, effective representation.

116. We wish to state at the outset that our colleagues genuinely believe that they have improved effective representation for this area, including by preserving an urban seat for Lethbridge. With respect, however, they have created far more problems than they have solved by any objective, non-partisan measure.

1) Lethbridge is a Poor Candidate for Any Significant Hybridization Based on Other Hybrids in the Province

117. Lethbridge is a city of approximately 110,000 people. Its residents and leaders clearly want two MLAs, who are drawn together with Lethbridge concerns regarding schools, busing, infrastructure, roads, *etc*—all of which are delivered in markedly different manners from the County of 40 Mile, the Siksika Reserve, or even Taber or Cardston. Unlike Medicine Hat, the population math is near-perfect for Lethbridge to get its desire. By our estimates, residents of Lethbridge sought to preserve the city's boundaries to the extent possible by an over 5:1 margin in their submissions to the ABEBC. We need very good reasons to be discarding that view, which would disrupt a *status quo* that has existed for 55 years.

118. Hybridizing Lethbridge to such a significant extent does not fit into any of the three examples of hybrid electoral divisions that we cite above. To use examples such as Camrose, Chestermere, Cochrane, Cold Lake, Fort Saskatchewan, Leduc, Lloydminster, Okotoks, Spruce Grove, and Sylvan Lake to justify hybridizing Lethbridge is disingenuous. Doing so misunderstands and misdescribes those electoral divisions, which were compelled by population.

119. Similarly, unlike Airdrie, Fort McMurray, Grande Prairie, Sherwood Park, or St. Albert, Lethbridge ***can*** be divided into two reasonably populated electoral divisions that basically follow the city boundaries. (We return to Medicine Hat below.)

120. Finally, the enormous hybrids that our colleagues have proposed for Lethbridge, which extend for hundreds of kilometres, are clearly distinguishable from the hybrids concerning Elbow Valley, Conrich, Prince of Peace, Tsuut'ina, Enoch, and Nisku. The longest distance from the city border and the extreme end of one of these electoral divisions is 30 km. The Calgary and Edmonton hybrids are adding rural areas to cities to share the burden of population and reflect that the "rural" areas are actually quasi-urban. By contrast, there are 80 km between the border of Lethbridge and the southern border of Lethbridge-Cardston, 120 km to the northern border of Lethbridge-Little Bow, and 150 km to the southeastern border of Lethbridge-Taber-Warner. Further, the rural populations added to the urban electoral divisions in the large cities are relatively small compared to their overall populations. In our colleagues' proposed Lethbridge hybrid electoral divisions, the populations of Lethbridge being incorporated into Lethbridge-Cardston, Lethbridge-Taber-Warner, and Lethbridge-Little Bow actually represent the minority of the population of the electoral divisions. Essentially, ***our colleagues have taken one of Lethbridge's two urban seats away and replaced it with a rural electoral division of Lethbridge-Little Bow.*** As we note above in our discussion of Blackfalds-Innisfail and Red Deer, we find it unlikely that these MLAs will become versed in Lethbridge's issues in a way that they would be if Lethbridge were the vast majority of their electoral division.

121. There is no similarity between the types of "hybrid" electoral divisions elsewhere in the province and what our colleagues propose to do with Lethbridge. The small portion of Lethbridge County placed into

Lethbridge-West ***is*** analogous to a hybrid such as Calgary-East, as the area in the county barely extends beyond the city, and lacks any transportation routes to the rest of the county without going through the city.

122. Our colleagues object to the non-hybridization of Lethbridge on the grounds that it is disparate treatment from Medicine Hat. However, ***the most similar community in terms of population size to Lethbridge is not Medicine Hat—it is Red Deer***. Like Lethbridge has been treated since 1971, Red Deer is placed into two electoral divisions that mostly follow the municipal boundaries of the community. If our panel members were looking for the example of ensuring that like communities of similar size and nature were treated the same, Red Deer is the most obvious example. In other words, we do not propose treating Lethbridge exceptionally, as our colleagues claim. We propose treating Lethbridge precisely the way one would expect a city of its size to be treated—and exactly how the other city of its size is treated. It is also how we expect Medicine Hat would be treated if Medicine Hat had a population of 110,000. We have also treated Medicine Hat and Lethbridge in another similar way that our colleagues generally support: we have mostly supported the *status quo* in both cities. There is no disparate treatment between these cities because they are in fundamentally different situations.

123. There were also pragmatic reasons to treat Medicine Hat and Lethbridge differently. It is mathematically possible, albeit pushing the envelope of legality, to have a purely urban Medicine Hat electoral division. This was, in fact, seemingly the strong preference of Hatters, despite the high population that would result. But the ABEBC, in its unanimous Interim Report, explicitly linked the decision to not have a purely urban Medicine Hat seat to the decision to keep Lethbridge urban. The ABEBC itself characterized this as a "compromise" even though the bulk of the submissions would have supported purely urban electoral divisions in both cities.[8]

124. Finally, we again note that hybrid electoral divisions were described in the *1994 Reference* as one of three methods that could be used to deal with the ongoing differential growth rates between more urban communities and more rural communities. The others were to expand the size of rural electoral divisions or to increase the number of electoral divisions. The direction to this panel to draw 91 electoral divisions, up from the current 87, is already using one of those methods. We have engaged in this exercise and provided our advice because we believe that going to 91 electoral divisions by adding two rural electoral divisions represents a fair balancing of the interests of those who live in rural and urban communities. The recommendation by our colleagues to do something unprecedented and unnatural with hybrid electoral divisions upsets that balance: they have added a third rural electoral division within the map of 91. This favours the interests of rural residents over the expressed interests of urban residents in a way that we view as unfair and undermines Lethbridge residents' right to effective representation.

2) The Reasons Given for Hybridizing Lethbridge Fail to Hold Up to Scrutiny in Light of "Communities of Interest"

125. Our colleagues base their justification to introduce hybrid electoral divisions in Lethbridge and to create hybrid electoral divisions in the northwest Calgary electoral divisions of Calgary-North West, Calgary-Bow and Calgary-West on the concept of "community of interest". Defining what constitutes a "community of interest" is a challenging exercise. There is not a legislative definition of the concept in the *Act*. What it

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[8] One similarly wonders whether the decision to place Elbow Valley, Tsuut'ina Nation, Conrich, and Prince of Peace in Calgary electoral divisions—but not Springbank or Bearspaw—was a compromise given that strong arguments could be made to include all of these areas in Calgary electoral divisions, but equally strong arguments could be made to include none of them.

does say, in section 14(b), is that in setting electoral boundaries, the commission is to take into consideration: "communities of interest, including municipalities, regional and rural communities, Indian reserves and Metis settlements". This language is echoed in paragraph C(e)(ii)(B)(II) of Motion 37 which provides the guidelines to this panel in the factors it ought to consider in its recommendations.

126. Alan Stewart, in "Community of interest in redistricting", a chapter in *Drawing the Map: Equality and Efficacy of the Vote in Canadian Electoral Boundary Reform* (1991, Lortie Commission at pages 117-174) describes the purpose of the concept of "community of interest" as follows:

> The rationale of the principle of community of interest is that electoral districts should be more than **arbitrary**, random groupings of individuals. They should be, as far as possible, cohesive units, areas with common interests related to representation. **Existing districts and municipal boundaries should be respected where possible**. The outer borders of the district should not divide distinct communities and neighbourhoods. **Unrelated and geographically isolated areas should not be artificially attached to districts with whose "core" population they share no significant links** [emphasis added]

It is worth noting that the concept of community of interest is used to describe the Commonwealth tradition of drawing electoral boundaries in contrast to the American practice of insisting that every constituency have the same population (generally within +/-0.5% population variation) and that boundaries can be drawn to ignore a community of interest to ensure equality of population.

127. When looking at what a "community of interest" actually is, both the legislative definition and in Mr. Stewart's description of the rationale, the primary community under consideration is the municipality. The reason for this was somewhat described in Courtney, John C. "Community of Interest in Electoral Boundary Readjustments." Electoral Insight 4.2 (2002): 9-13 for the following reasons:

> parliamentary electoral districts are frequently constructed to accord with local district boundaries. This makes a good deal of sense, for the local district itself constitutes a perceptible and understandable community of interest for the majority of its residents. City, municipal, or county boundaries may never change in the lifetime of the residents, whereas electoral district boundaries may be altered every decade or so.

This "perceptible and understandable community of interest" was also reflected in the public feedback of the public members from Lethbridge that provided written submissions to the ABEBC. The written submissions that were provided by an overwhelming majority (approximately 75 to 14 on those that specifically weighed in on the question) expressed a desire for the boundaries of the Lethbridge electoral divisions to generally reflect the municipal boundaries of Lethbridge. Simply put, the residents of Lethbridge see themselves as a distinct community with interests that differ from the rural municipalities that surround it. They see themselves as having different interests, different matters of concern and different priorities than their rural neighbours. This difference of interest is frequently reflected in the different ways that urban municipalities, even mid-size urban municipalities, experience and resolve problems related to infrastructure, crime, recreation, and social cohesion. Following existing boundaries and municipal boundaries is very natural and logical in terms of communities of interest, because they map onto how persons receive services from their governments. This is another reason we are skeptical of the inclusion of Bearspaw and Springbank in Calgary electoral divisions.

128. Our colleagues have based their use of hybrid electoral divisions on the idea that Lethbridge is the centre of a type of "node" that is used by people all over Southern Alberta. We do not doubt that people from all over Southern Alberta frequent Lethbridge for a variety of reasons. We suspect this is the same way that people from various parts of Alberta use Calgary or Edmonton for various services as large urban centres tend to offer services and interactions that are not economically viable in smaller centres. However, this does not mean that the people of Lethbridge intrinsically see these people as part of their community nor does it mean that the people visiting Lethbridge see themselves as part of that community. This was expressed loud and clear in the public engagement on this matter when an overwhelming majority of the residents of Lethbridge stated they opposed this type of electoral division structure. The small number of voices in favour were those from outside Lethbridge or those with a vested interest in this structure.

129. As an example of their approach, our colleagues justify dividing Lethbridge in part on the basis that Southern Alberta shares health care services such as the Chinook Hospital. However, the Livingstone-Macleod and Taber-Cardston MLAs should be advocating for Lethbridge health services whether or not Lethbridge is in their electoral divisions, because their constituents use the services. This is just like how the Lethbridge-West MLA should be advocating for the hospital even though it is located in Lethbridge-East. The same is true of the post-secondary institutions. But residents throughout Southern Alberta (especially outside Lethbridge County) do not share interests regarding schools, roads, and myriad other matters we note at paragraph 127. They are in different municipal governments and generally have significantly different housing structures and municipal taxation considerations. This also distinguishes our colleagues' proposed hybridization of Lethbridge from the hybrids they (and, to a lesser extent we) propose concerning Enoch, Nisku, Tsuut'ina, Prince of Peace, Conrich, Bearspaw, Springbank, and Elbow Valley. In those cases, the residents use the schools and other municipal services from the cities. One can fairly say these areas are functionally in Calgary or Edmonton. One could even say the same regarding the areas of Lethbridge County in acreages immediately to the city's east or west: but this ends once one leaves these areas within a ten-minute drive, and certainly once one leaves Lethbridge County. We also note that our colleagues' proposed electoral division of Lethbridge-Little Bow extends north of the Siksika Reserve such that residents would be travelling to Calgary rather than Lethbridge for government services.

130. Although a case could be made that municipalities such as Coaldale and Coalhurst share interests and outlooks with residents of Lethbridge, removing the population of these municipalities from their rural neighbouring electoral divisions creates cascading effects that are clearly unreasonable, such as residents of Lethbridge being paired with residents of areas north of the Siksika Reserve or in the County of 40 Mile. Once one goes further into rural Alberta, and certainly once one leaves Lethbridge County, there is very little support for, and significant resistance to and doubts about, hybridizing various parts of Southern Alberta with Lethbridge. This approach to hybridization is treated just as skeptically among rural and urban voters. The reactions of Okotoks's residents and municipal politicians to being paired with Calgary in the ABEBC Interim Report were telling of how most urban and rural Albertans view these matters.

131. We also view the agricultural link in this area to be of minimal importance in drawing electoral boundaries. Agriculture is the sixth largest employer by industry classification in the entire Lethbridge-Medicine Hat region with 11,500 employees in June, 2026 out of 155,100 total employed persons. Accordingly, our colleagues have sought to override what seems to be the vast popular opinion of the submissions provided by the residents of the area to try to unite the common interests of less than 10% of the region's workforce.

132. While preserving a purely Lethbridge seat guarantees a voice for the city, there will be three other MLAs whose electoral divisions overwhelmingly consist of non-city dwellers. These MLAs will not need the votes of Lethbridge residents to win re-election and the overall voice of Lethbridge will be unquestionably diluted. While there may nominally be four Lethbridge MLAs, there will only be one MLA whose job is truly to advocate for Lethbridge.

133. Our colleagues further suggest that this redraw is necessary because more significant hybridization will need to occur in Lethbridge at the next redistribution and it is prudent to draw electoral divisions that will be durable. This downplays the fact that they are prematurely dismantling the structure of the past 55 years. More importantly, however, their solutions to the problem of the next redistribution are premature and speculative. There is no need to thrust a highly disruptive, unnecessary map onto Lethbridge when the present numbers do not require it and the next redistricting cycle will be able to approach this issue with more evidence and submissions.

134. Finally, we must respectfully observe that this map of the Lethbridge area bears all the hallmarks of a practice called "packing". Packing means that the electoral boundaries of a city and its surrounding area are drawn to make one electoral division contain most of the voters of one party (normally the opposition party). By creating a packed electoral division which will have an overwhelming number of voters for the opposition party, the rest of the electoral divisions in the city and surrounding areas will have fewer opposition voters. This makes it easier for the party who drew the boundaries to win additional seats. As noted above, we accept that our colleagues genuinely believe that they are improving effective representation. However, in light of the ABEBC Minority Report, and reaction thereto, from earlier this year, we are deeply concerned about whether the benefit of the doubt will be given to our colleagues. The impact on Alberta democracy and the trust the public has in our democratic institutions will be grave.

135. In sum, our colleagues' decision to hybridize Lethbridge is based on the premise that there are actually stronger communities of interest between those living in Lethbridge and areas two hours away via car, than between communities within Lethbridge itself. They conclude that the ABEBC erroneously concluded otherwise based on no public consultation and no new evidence. In fact, they conclude that their redraw of Lethbridge is "necessary" for effective representation. This is not a credible conclusion.

E. The Changes to Canmore-Banff and Okotoks-Diamond Valley Undermine Effective Representation for Both Electoral Divisions

136. Partially as a cascading consequence of the approach to Lethbridge we warn against above, our colleagues have been forced to place Diamond Valley into an electoral division with Banff and Canmore. The justification is that Diamond Valley is part of a "tourism corridor". The core nature of tourism in the Banff-Canmore corridor cannot be overstated. The Town of Banff estimates that 61% of all employment and 90% of the economy of Banff overall is linked to the tourism industry. It has an estimated capacity of approximately 3,700 hotel rooms. The Town of Canmore Labour Market Recruitment and Retention Strategy estimated that 33% of all employment in Canmore is linked to tourism.

137. By comparison, Diamond Valley's Chamber of Commerce listing has two hotels. While it is a charming and beautiful community, it is simply not a tourism-based community in the same way that Canmore and Banff are. The ABEBC majority proposal already included in the Canmore-Banff electoral division the Kananaskis and Fortress ski hills. Our colleagues state that Diamond Valley is at least partly tied into the

Canmore-Banff electoral division by Highway 40 over Highwood Pass. However, this road is open to car traffic for less than half of the year (even less than the road between Banff and Jasper). Highway 40 is closed the rest of the year as an important wildlife migration corridor and due to concerns about avalanches. The municipal development plans our colleagues cite to turn Diamond Valley into a tourism hub will take years to be implemented, if they are ever implemented. We cannot build electoral boundaries today on what may or may not develop economically in the next 10-20 years.

138. Moreover, there was overwhelming desire for Okotoks and Diamond Valley to be paired in the same electoral division after the ABEBC Interim Report. Not a single submission, to our knowledge, asked for Diamond Valley to be paired with Banff. Okotoks and especially Diamond Valley are small, agriculture and commuter-based municipalities outside Calgary in Foothills County. They are very different from a cultural and economic perspective from the mountain, tourism-based communities of Banff and Canmore. Diamond Valley shares the Sheep River watershed with Okotoks. Diamond Valley and Okotoks have shared municipal services in waste and recreation. The two communities are very closely tied together. Separating them to add population to the Canmore-Banff electoral division makes little sense.

139. One area of Foothills County is more tied to the Canmore-Banff electoral division. The Eden Valley Reserve is a Stoney Nakoda Bearspaw Nation reserve more culturally tied to the Bearspaw Nation Mini Thni Reserve. Accordingly, it was also included in the ABEBC Canmore-Banff electoral division. The Eden Valley Reserve is clearly distinguishable, in terms of its links to Canmore-Banff, from Diamond Valley.

140. While we have some sympathy for our colleagues' view that Canmore-Banff is an odd candidate for s 15(2) status given the wealth of the electoral division and the proximity to Calgary, the ABEBC addressed this issue comprehensively in the Majority Report:

> The Commission has elected to give the electoral division s. 15(2) status given the high Indigenous population, distance from the Legislature, and the two towns at its heart not neatly fitting in with adjacent areas from a communities of interest perspective. The residents, even those located outside the national park, are largely industry dependent on Banff National Park, giving the electoral division a common interest. Multiple reserves are also in this electoral division.
>
> We recognize that Jasper also fits in with this electoral division for these reasons. That is why it was included in this electoral division in the interim report. However, for reasons noted above, the Commission is persuaded that the logistics of Banff and Jasper being in the same electoral division are not feasible. Jasper's residents receive their services from the provincial government in Hinton or Edmonton, not Banff or Canmore. Moreover, Jasper and Banff are separated by hundreds of kilometres with no inhabitants between them (apart from the modest population in Lake Louise), and a road that is impassable for several months of the year. Accordingly, the Commission declines to place Jasper in this electoral division, but, in recognition of the communities of interest, gives the electoral division s. 15(2) status. Effective representation will follow.
>
> Submissions that asked for Canmore to be placed in an electoral division with Crowsnest Pass and Banff to be an electoral division with Rocky Mountain House were clear mischief-making. The fact that many people who made these submissions advocating for the separation of Banff and Canmore insisted that Jasper needed to be in the same electoral division with Hinton

underscored that these submissions were not made in good faith. Banff and Canmore clearly need to be in the same electoral division.

Revisiting this determination is another collateral attack on the ABEBC Majority Report holdings (see paragraphs 74-77 for analysis of collateral attack). We also note that the restoration of Rocky Mountain House-Sundre creates a fourth seat with s 15(2) status, which the unanimous Panel supports despite its proximity to the legislature, because it does not fit neatly with surrounding areas. Symmetrical treatment of Rocky Mountain House-Sundre and Canmore-Banff is thus justifiable.

141. Even if we were to accept that Canmore-Banff's s 15(2) status needs to be removed, there were vastly more logical ways to address this issue. There are other areas that abut the eastern slopes of the Rockies (such as Jasper and Crowsnest Pass) that could have been added to Canmore-Banff and were supported by significant submissions. Objections based on limited highway access between Jasper and Banff are even more applicable to highway connections between Canmore and Diamond Valley given the lengthy closures of Highway 40. Alternatively, Springbank shares the transportation corridor between Calgary and Canmore, and it is presently paired with Banff and Canmore. The link between Okotoks and Diamond Valley, which our colleagues propose to sever, in terms of delivery of municipal services is much stronger than the link between Calgary and Springbank, which our colleagues insist on creating.

142. Our colleagues have recommended breaking up the proposed Cochrane-Springbank electoral division because they disagree with the ABEBC Majority's rationale that it was necessary to maintain an appropriate population balance for the electoral divisions. Yet the links between Diamond Valley and Banff and Canmore are far weaker than the links between Springbank and Cochrane.

143. Our colleagues' suggestions of placing communities that are so obviously of disparate interest together to accommodate proposed changes to the Lethbridge area demonstrate those suggestions do not improve effective representation for this area of the province.

VII) Other Concerns

A. The Partisan Implications and Circumstances of the Calgary and Lethbridge Changes Must Be Considered

144. We would be remiss not to note that our colleagues' proposed changes to the maps of Calgary and Lethbridge have obvious partisan implications. As Chief Justice Roberts observed for the Supreme Court of the United States in *Rucho v Common Cause*, 588 U.S. 684, 692–93 (2019), such partisan implications do not, without more, dispose of questions of propriety. All changes may have partisan implications. But in the circumstances of this Panel, we must be particularly sensitive to making changes that have obvious partisan implications and are not obviously necessary for effective representation. We say this for two reasons.

145. First, the restoration of the two rural electoral divisions also has obvious partisan implications. Many Albertans will view that in itself as unfair (Mr. Clark, one of the ABEBC's commissioners, has already publicly stated as much), and suggest that these divisions should only be restored if additional urban seats are added. This perspective is eminently understandable. Changes in population since 2024, as well as further projected growth, mean that one could make a strong case that, in a map of 91 electoral divisions,

Edmonton should have at least 22 electoral divisions and Calgary should have at least 29. Is it wise to be making more changes than necessary to preserve rural representation?

146. Second, these changes are occurring in the aftermath of the ABEBC Minority Report, which the Majority noted appeared to be "motivated by other considerations" (page 63) and resulted in some electoral districts around Calgary looking a bit like infamous salamanders. Boundaries similar to the IAP Majority's proposed changes to Lethbridge and Calgary were part of the package of that widely condemned "unreasonable and unconstitutional map" (page 67). Albertans are right to be skeptical as to the motives behind that map. These circumstances will affect how our colleagues' changes are perceived. In other words, the well has been poisoned. ***It is important for faith in democracy not only for electoral boundaries to be fair, but for them to be perceived to be fair.***

B. The Prime Importance of Population in Drawing Electoral Divisions

147. We also note that our colleagues' changes to Calgary and Lethbridge increase population disparities. In small ways, to be sure. But this warrants a short discussion on the predominant place of population in drawing electoral divisions, beyond our colleagues' changes to Calgary and Lethbridge.

148. In the ABEBC Majority Report, Calgary districts had an average population of 56,379 or 2.64% above the provincial average. Edmonton districts had an average population of 58,041 or 5.67% above the provincial average. The other districts in Alberta had an average population of 52,281 or 4.82% below the provincial average.

149. If the IAP Majority districts are adopted, Calgary districts have an average population of 56,726 or 5.59% above the provincial average. Edmonton districts have an average population of 56,948 or 6.00% above the provincial average. All other districts in Alberta have an average population of 50,107 or 6.73% below the provincial average.

150. These disparities are exacerbated once one expands the consideration from Alberta's two largest cities to the four largest cities to include Red Deer and Lethbridge. If those cities are included in the "urban" definition, the average population of urban districts goes to 56,847 or 5.82% above the provincial average. There is also one fewer seat within those urban districts as they go from a total of 53 to 52 seats as the IAP Majority has removed an urban electoral division from Lethbridge.

151. The proposed IAP Majority recommendations exacerbate the underrepresentation of the four largest cities in Alberta. While this cannot be entirely resolved by adopting our recommendations, leaving the Lethbridge and Calgary electoral divisions as proposed by the ABEBC Majority would reduce the underrepresentation of urban areas while still restoring Lac Ste. Anne and Rocky Mountain House-Sundre:

Table 5. Comparison of Population in ABEBC Majority Report to IAP Majority Report

	ABEBC Majority	**Variance to Average**	**Majority Panel**	**Variance to Average**
Calgary Average	56,379	2.64%	56,726	5.59%
Edmonton Average	58,041	5.67%	56,948	6.00%
Other Average	52,281	-4.82%	50,107	-6.73%
Edmonton, Calgary, Lethbridge (East/West or Lethbridge), Red Deer-North, Red Deer-South Average	57,021	3.81%	56,847	5.82%
Average	54,929		53,722	

152. Since the Alberta Court of Appeal made it clear in the *1994 Reference* that significant variances in populations between electoral divisions must decrease, we have seen a gradual reduction in population variances. The ABEBC Majority Report reversed a decades-long trend in this respect. The IAP Majority indicates that population disparities must further increase in the future.

153. While population is only one statutory consideration in drawing electoral divisions, **it remains the prime variable in drawing electoral divisions**. While not the end of the analysis concerning effective representation, it is sound to treat all Albertans equally in the absence of a compelling reason to the contrary. Ian Gray made this point particularly well in a submission in response to the Interim Report:

> The Commission has provided its detailed explanation as to why Alberta (and Canada) prefers the principle of "effective representation" over strict voter parity. It's well reasoned and logical and the Commission must be recognized for striving mightily to keep the variances in its report as low as it can (under 10% + or minus, in the majority of ridings). **But it doesn't make the situation any less irksome to an Albertan whose vote is diluted compared to someone else's**. A vote in the proposed Edmonton-Glenora-Riverview riding will be worth roughly 32% less than a vote from Drumheller-Stettler. While fully recognizing the constraints under which it must operate, anything the Commission can do to get that number and others like it, closer to parity, serves the interests of democracy. [emphasis added]

Mr. Gray, to be sure, admitted he was trying to "have [his] cake and eat it too" (his words) by seeking to preserve the electoral division of Edmonton-Riverview. But he makes a good point: before we tell an Albertan that their vote should be worth less than another's, we must have a very good reason—ideally, a non-partisan one that almost all people of goodwill will accept as reasonable. Once the reason given is subject to reasonable disagreement, or appears to be partisan gamesmanship in disguise, many Albertans will immediately suspect that their vote is being diluted unnecessarily. Little could undermine Alberta democracy more. These concerns are heightened in the aftermath of the ABEBC Minority Report.

154. It is telling that the ABEBC received few submissions (at least outside of Beaumont) where the submitters requested to be in electoral divisions with higher-than-average populations. Residents of almost all electoral divisions sought to advocate for or justify lower-than-average populations in their electoral

divisions. This was not confined to rural areas: Mr. Gray acknowledged he was no exception in this regard. This self-advocacy for lower-than-average populations ranged from the north of the province to the Highway 2 corridor between Airdrie and Leduc, to northeast and western Calgary to inner-city Edmonton. To be sure, most of the individuals arguing for these variances claimed they were necessary for "effective representation". But the self-interest is nonetheless apparent, meaning that we should treat these submissions with caution. There were exceptions to this advocacy for lower-than-average populations, notably in Edmonton-North West, Edmonton-Castle Downs, Calgary-Shaw, and Leduc-Beaumont. The advocacy of residents to dilute the value of their votes in the interests of community cohesion indicates that community cohesion is indeed the basis of their submissions. It is why we are particularly comfortable with the higher-than-average populations in these electoral divisions.

155. In this vein, we also note that the "effective representation" principle, explained by Justice McLachlin in *Carter*, has been subject to significant academic criticism from those who argue for a stricter adherence to representation-by-population: see, *e.g.*, Michael Pal, "The Fractured Right to Vote: Democracy, Discretion, and Designing Electoral Districts" (2015) 61:2 McGill LJ 232; Colin Feasby, "Reimagining Democratic Rights" Speech at Queen's University Faculty of Law (2 March 2026); online: <https://law.queensu.ca/news/podcast-reimagining-democratic-rights>. Advances in technology since 1991 have not eliminated, but have certainly mitigated, many of the challenges that come with representing vast, sprawling rural areas. The courts in the mid-to-late 2020s are less likely to be as tolerant of the population variances that they permitted in the early-to-mid 1990s. Indeed, in ***Toronto (City) v Ontario (Attorney General)*, 2021 SCC 34**, Chief Justice Wagner and Justice Brown, for a majority of the Supreme Court, underscored that "effective representation connotes ***voter parity*** which, while not exhaustive of the requirements of effective representation, ***is the overarching concern and the condition of 'prime importance'***" (para 46). Greater emphasis on voter parity may well be mandated in 2026.

156. To repeat, we are not suggesting that population must be considered to the exclusion of everything else. The American experience is a cautionary tale in that respect. A map with 53,722 individuals in each electoral division would doubtless be undesirable and look ridiculous. Any suggestion that we are advocating for that is a straw man argument. ***The maps proposed in this IAP Minority Report have greater disparities than any maps adopted in Alberta for decades.*** If we were able to use the 2026 Census data, we are certain they would be even greater. Logistical challenges in representing areas, ensuring clear boundaries, and respecting communities of interest must all be taken into account. It may well be that the 2017 redistribution weighed population parity excessively. But these non-population considerations are discretionary and at times can be in tension with each other (which is a theme we return to below). In the face of reasonable disagreement, population parity must be weighted significantly. Our Commonwealth brethren in the United Kingdom, Australia, and New Zealand have maximum variances of 5-10%. This works very reasonably. If those drawing boundaries cannot be trusted to weigh the non-population factors in a reasonable and non-partisan manner, the courts may order even greater emphasis on population parity. The risks of litigation is a matter to which we now turn.

C. Risks of Litigation

157. For the foregoing reasons, we are of the view that litigation is likely if our colleagues' proposed changes to electoral divisions containing territory south of Airdrie (with the exceptions of Drumheller-Stettler and Canmore-Banff) are adopted. This would be a problem in itself: while courts are obliged to enforce the constitution, they have necessarily a limited set of facts before them, and can be tempted to find legal

solutions to political problems. There will be a perception—mistaken but understandable—that the courts have entered the political fray by being forced to strike down the maps that the legislature has adopted.

158. Nor is the remedy guaranteed to be the imposition of this, the IAP Minority, map of 91. We consider our map to have struck the right balance between representation-by-population, other statutory and constitutional criteria, and the challenges of representing sparsely populated rural areas. However, we recognize that others may not agree and instead take the view that a "Rocky Mountain House-Sundre" electoral division in particular would only be justified as being minimally impairing of urban Albertans' right to vote in a map of 93 or 95, which would add additional urban seats. A court may accordingly impose the ABEBC Majority Report's final recommended map of 89—the map of 87 failing to provide effective representation to those in central and north Calgary and south Edmonton given population growth since 2017. The Supreme Court has also recently confirmed that freezing an entire electoral map to protect two electoral divisions is itself unconstitutional: ***Quebec (Attorney General) v Lalande*, 2026 SCC 13**.

159. In the *1994 Reference*, the Alberta Court of Appeal expected that the variance in population between urban and rural electoral divisions (and thus the gap in voting power) would inevitably decrease over time. That has indeed been the trend: until this year. In March, the ABEBC ***Majority*** Report proposed maps with a greater variance in population between rural and Calgary and Edmonton electoral divisions than the 2017 redistribution, ending a decades-long trend. Our map of 91 increases that variance further with higher populations in urban electoral divisions and lower populations in more rural electoral divisions. While we view our map to be constitutionally compliant, for reasons we have explained, going against the trend of the last several decades is something we do with hesitation. Our colleagues increase the gap even more, creating further—and unnecessary—constitutional risk.

160. On the note of the legislature's constitutional purview in this area, while the Supreme Court in *Carter* held that independent commissions are not constitutionally required (over Justice Cory's doubts in this regard), we are less certain that it would find the same 35 years later. Since *Carter*, the Supreme Court has held that independent commissions are required for judicial compensation given the constitutional stakes: ***Reference re Remuneration of Judges of the Provincial Court (PEI)*, [1997] 3 SCR 3**. The stakes for democracy in fair elections are equal if not greater. Irregular processes have been tolerated in the past, but usually in the face of all-party agreement. In 2026, it is completely possible that a court would hold that disregarding an independent commission's recommendations regarding electoral boundaries itself amounts to a limit on s 3 that would require justification under ***R v Oakes*, [1986] 1 SCR 103**. This could result in the imposition of the ABEBC Majority Report's map of 89.

161. To be sure, we are not predicting that those events will transpire in litigation. But litigation is unpredictable and this saga may well prompt courts to revisit the *Carter* framework.

VIII) Conclusion

162. Much of life in a healthy democracy depends not on laws but on norms. This is good. Resorting to the courts forces rigid legal solutions rather than nuanced compromises onto complex problems. This is why allowing a pluralistic society to resolve these issues through established norms is always preferable. We have sought to participate in this process bearing this in mind.

163. Over the past several decades in Canada, independent electoral boundary commissions have been part of our democratic norms. They do important work quietly and fairly, and have helped insulate Canadian redistricting from the problems that plague our neighbours south of the border. They benefit:

a) the public, by ensuring that the incumbent is not trying to fix the election in its favour;
b) the opposition, by ensuring that they have a fair field in which to compete; and
c) the governing party, by giving determinations of how to draw electoral divisions, which will inevitably leave some caucus members unhappy, ***to someone else***.

For a more extensive history of electoral boundary commissions in Canada, see: John C Courtney, *Commissioned Ridings: Designing Canada's Electoral Boundaries* (Montreal and Kingston: McGill-Queen's University Press, 2001), where he noted a quarter-century ago at pages 138-139 (in the context of discussing federal redistribution):

> Members nonetheless had a variety of other reasons for disliking the proposals of the commissions. In its 1995 report to Parliament summarizing the MPs' objections, the Commons committee listed several causes for concern among the members. Principal among these were: the excessive attention paid by commissions to constructing seats with populations approximating the provincial quota; the failure of commissions to make sufficient use of the +/- 25 percent margins; the insufficient attention paid to the protection of communities of interest and to the need to ensure effective representation; the need for more information and more clearly stated reasons on the part of commissions for the proposals they advanced; and the general neglect by commissions of anticipated population growth (a provision that had in fact been dropped from the legislation by Parliament in the 1970s) in fast-growing areas. **At the root of those concerns, however, was the issue that MPs care most about in a boundary revision: whether and how it affects their own riding**.
>
> The 1994-5 parliamentary committee was mindful of **the inherently contradictory nature of its list of objections**. In a particularly revealing passage in its report, it recited the two sides of a perennially familiar issue among MPs but without offering any suggestions for its resolution:
>
> > [The] problems of representing urban and rural constituencies were frequently raised [by members] ... [R]ural constituencies place special demands on an MP; they are more difficult to serve because of their large size, difficulty in transportation and communications, and the number of municipalities, organizations and counties. Moreover, rural constituencies tend to make great demands of their elected representatives because of the absence of services that are more readily available in urban areas. There was also a concern that rural constituencies were losing ground to the urban counterparts, either because of their unmanageable size or because of an increasing number of mixed urban-rural ridings where the interests of rural voters tend to be overshadowed by those of urban voters. Against this, it was strongly argued that urban ridings, while geographically small, are often very diverse and carry their own particular types of problems and challenges. They often possess large and growing populations, high rates of mobility, and a diverse ethnic and cultural make-up. It was argued by many members that the workload created by uniquely urban issues, such as immigration and unemployment was very heavy, and should result in smaller urban ridings in order to counter the cynicism about the political system that

> exists among many urban voters. *Obviously, the conflicting demands of rural and urban Canadians and members cannot be reconciled, but these concerns must be taken into account.*
>
> [Bolding added; italics in original.]

"There is nothing new under the sun": *Ecclesiastes*, Chapter 1, Verse 9.

164. Canada's democracy has endured by placing the populace, rather than their representatives, at the centre of this process. There is no perfect solution because every decision involves trade-offs. We are confident that the map of 91 electoral divisions that our Minority Report proposes is a reasonable balance of those trade-offs.

165. The rare instances where electoral boundaries commissions' decisions have not been followed have, as we noted above, usually been accepted by all political parties. These are norms working well: incredibly interesting to politics nerds, but generally boring.

166. In an unhealthy democracy where norms are not followed, however, the heavy hand of the law may have no choice but to intervene. This 2025-2026 Alberta redistricting process has pushed the envelope of democratic norms. Acting beyond the restoration of the two rural electoral divisions, and adopting our colleagues' proposed maps south of Airdrie, will likely force the courts to enter this fray.

167. As late in the day as it is, however, it is still possible for the legislature to make electoral redistricting boring again[9] —the legislature can adopt the following 91 maps:

As Mapped by the ABEBC Majority Final Report:

1) Calgary-Acadia
2) Calgary-Beddington
3) Calgary-Bhullar-McCall
4) Calgary-Bow
5) Calgary-Buffalo
6) Calgary-Confluence
7) Calgary-Cross
8) Calgary-Currie
9) Calgary-East
10) Calgary-Edgemont
11) Calgary-Elbow
12) Calgary-Falconridge-Conrich
13) Calgary-Fish Creek
14) Calgary-Glenmore-Tsuut'ina
15) Calgary-Hays
16) Calgary-Klein
17) Calgary-Lougheed
18) Calgary-McKenzie
19) Calgary-Mountain View

---

9 See Lisa Young, "Let's make electoral boundaries boring again" *What now?!? An Alberta Politics newsletter* (19 April 2026), online: <url=https://lisayoung.substack.com/p/lets-make-electoral-boundaries-boring>.

20) Calgary-North
21) Calgary-North East
22) Calgary-North West
23) Calgary-Nose Creek
24) Calgary-Shaw
25) Calgary-South East
26) Calgary-Symons Valley
27) Calgary-Varsity
28) Calgary-West-Elbow Valley
29) Edmonton-Beverly-Clareview
30) Edmonton-Castle Downs
31) Edmonton-City Centre
32) Edmonton-Decore
33) Edmonton-Enoch
34) Edmonton-Glenora-Riverview
35) Edmonton-Gold Bar
36) Edmonton-Highlands-Norwood
37) Edmonton-Manning
38) Edmonton-McClung
39) Edmonton-Mill Woods
40) Edmonton-North West
41) Edmonton-Rutherford
42) Edmonton-West Henday
43) Airdrie-East
44) Airdrie-West
45) Chestermere-Strathmore
46) Cochrane-Springbank
47) Okotoks-Diamond Valley
48) Fort Saskatchewan-Vegreville
49) Sherwood Park
50) St. Albert
51) Strathcona-Sherwood Park
52) Central Peace-Notley
53) Cold Lake-Bonnyville-St. Paul
54) Grande Prairie
55) Grande Prairie-Wapiti
56) Lesser Slave Lake
57) Peace River
58) Camrose
59) Lloydminster-Wainwright
60) Red Deer-North
61) Red Deer-South
62) High River-Vulcan-Siksika
63) Lethbridge-East
64) Lethbridge-West
65) Livingstone-Macleod

66) Medicine Hat-Brooks
67) Medicine Hat-Cypress
68) Taber-Cardston

As Mapped by the ABEBC Interim Report:

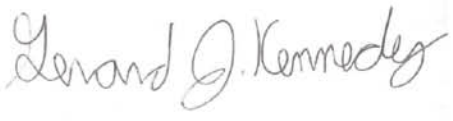
69) Edmonton-Ellerslie
70) Edmonton-Meadows
71) Edmonton-South
72) Edmonton-Strathcona
73) Edmonton-Windermere (previously named "Edmonton-South West")
74) Edmonton-Whitemud
75) Fort McMurray-Lac La Biche
76) Fort McMurray-Wood Buffalo

As Mapped in the LAP Majority Report, for a Unanimous LAP:

77) Lac Ste. Anne
78) Morinville-Sturgeon
79) Barrhead-Westlock-Athabasca
80) Spruce Grove
81) Drayton Valley-Devon
82) Leduc-Beaumont
83) Edmonton-Nisku
84) West Yellowhead
85) Rocky Mountain House-Sundre
86) Wetaskiwin-Ponoka
87) Lacombe-Sylvan Lake
88) Drumheller-Stettler

Where We Recommend Minor Amendments that Can Be Easily Described:

89) Canmore-Banff: *as mapped by the ABEBC Majority, but excluding areas that the unanimous LAP has moved to Rocky Mountain House-Sundre*
90) Blackfalds-Innisfail: *as mapped in the LAP Majority Report, but excluding areas in the City of Red Deer*
91) Olds-Didsbury-Three Hills: *as mapped in the LAP Majority Report, but excluding areas in Wheatland County*





Gerard J Kennedy
Edmonton

Brent L Robinson
Okotoks

APPENDIX 1

Government Motion 37

Government Motion 37

Moved by Hon. Mr. Schow:

A. Be it resolved that the Legislative Assembly recognize that

(a) the Alberta Electoral Boundaries Commission's Final Report, which was tabled by the Speaker of the Legislative Assembly on March 26, 2026 (Sessional Paper 436/2025-26), makes recommendations to the Legislative Assembly as to the area, boundaries, and names of the electoral divisions of Alberta, referred to as the Final Report,

(b) on the tabling of the Final Report, the Commission appointed under section 2 of the Electoral Boundaries Commission Act is concluded,

(c) the Final Report includes input from Albertans provided through written proposals and public hearings held across Alberta,

(d) the Final Report includes a Majority Report, an Addendum to the Majority Report and a Minority Report,

(e) the Majority Report notes that since the last Electoral Boundaries Commission report in 2017, the population of Alberta has increased by over 800,000 people and that in responding to these changes, the Legislature expanded the number of available seats by two, from 87 to 89,

(f) the Majority Report notes that the size of the Legislative Assembly was only increased by 2 percent despite the population increasing by 20 percent,

(g) the Majority Report expresses regret that the Commission had to remove two ridings from central and north central Alberta in order to address this population increase,

(h) the Majority Report states that the majority of the Commission believes that it would have been able to provide Albertans with more effective representation had the Legislature provided an additional two seats and indicates that, had the Commission been given the power to do so, it may have proposed a map of at least 91 electoral divisions,

(i) the Addendum to the Majority Report

(i) proposes that if the Legislative Assembly cannot concur in the Majority Report's recommendation to remove two electoral divisions from areas outside of the Cities of Edmonton and Calgary, the Legislative Assembly consider amending the Electoral Divisions Act for the purpose of increasing the number of electoral divisions for the next general election from 89 to 91,

(ii) proposes that the matter be referred to an all-party Select Special Committee or other legislative committee, and

(iii) in its four additional recommendations cited as Recommendation 5(a) to (d), provides recommendations to protect certain proposed electoral divisions described in the Majority Report from substantive alteration stemming from the addition of two additional electoral divisions, and

(j) section 3 of the Canadian Charter of Rights and Freedoms guarantees that 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, which includes a right to effective representation;

B. And be it further resolved that the Legislative Assembly urge the Government to introduce a Bill to amend section 13 of the Electoral Boundaries Commission Act to provide for 91 proposed electoral divisions;

C. And be it furthered resolved that

(a) a Select Special Committee on Electoral Boundaries be established to oversee an independent review of electoral boundaries of Alberta

(i) on an expedited basis, and

(ii) without a requirement to direct the holding of public hearings,

(b) the Committee consists of the following:

(i) Mr. Lunty as the Chair of the Committee;

(ii) 3 Members of the Government caucus nominated by the Government House Leader, the nominations of which are to be submitted to the Chair;

(iii) 2 Members of the Opposition caucus nominated by the Opposition House Leader, the nominations of which are to be submitted to the Chair,

(c) the Committee is constituted on the nomination of a majority of its Members and continues despite any vacancies in its membership,

(d) the Committee be directed to engage independent advisors

(i) to serve on an independent advisory panel to carry out the mandate referred to in clause (e), and

(ii) who are to be appointed by the Committee as follows:

(A) a chair of the independent advisory panel who must be one of the following.

(I) the president of a post-secondary educational institution in Alberta;

(II) a judge or retired judge of any court of Alberta;

(III) a person whose stature and qualifications are similar to those of the persons referred to in subparagraphs (I) and (II);

(B) on nomination of the Leader of His Majesty's Loyal Opposition in consultation with the leaders of other opposition parties represented in the Legislative Assembly, 2 persons who are not Members of the Legislative Assembly;

(C) on nomination of the President of the Executive Council, 2 persons who are not Members of the Legislative Assembly;

(D) with respect to the persons appointed under paragraph (B), one must be a resident in a city and the other resident outside a city at the time of their appointment;

(E) with respect to the persons appointed under paragraph (C), one must be a resident in a city and the other resident outside a city at the time of their appointment;

(F) all persons appointed under paragraphs (A), (B) and (C) must be Canadian citizens, residents of Alberta and at least 18 years of age.

(e) the independent advisory panel's mandate is to

(i) conduct a review of the electoral boundaries of Alberta and make proposals as to the area, boundaries and names of the electoral divisions of Alberta.

(ii) in conducting its review,

(A) divide the electoral boundaries of Alberta into 91 proposed electoral divisions

(B) incorporate the recommendations provided in Recommendation 5 in the Addendum to the Majority Report subject to any modifications the independent advisory panel considers necessary, taking into consideration the requirement for effective representation as guaranteed by the Canadian Charter of Rights and Freedoms and

(I) sparsity, density and rate of growth of the population

(II) communities of interest, including municipalities, regional and rural communities, Indian reserves and Metis settlements,

(III) geographical features,

(IV) the availability and means of communication and transportation between various parts of Alberta,

(V) the desirability of understandable and clear boundaries, and

(VI) any other factors the independent advisory panel considers appropriate, and

(C) ensure that its proposals comply with the following requirements:

(I) the population of a proposed electoral division must not be more than 25 percent above nor more than 25 percent below the average population of all the proposed electoral divisions;

(II) despite subparagraph (I), in the case of no more than 4 of the proposed electoral divisions, if the independent advisory panel 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 percent below the average population of all the proposed electoral divisions:

1. 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;

2. 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;

3. there is no town in the proposed electoral division that has a population exceeding 8,000 people;

4. the area of the proposed electoral division contains an Indian reserve or a Metis settlement;

5. the proposed electoral division has a portion of its boundary coterminous with a boundary of the Province of Alberta;

(III) for the purpose of the 3rd criterion set out in subparagraph (II), the municipality of Crowsnest Pass is not a town,

(iii) conduct its review despite any vacancies in its membership,

(iv) on or before October 22, 2026, submit to the Committee a report based on its review, and

(v) on the independent advisory panel submitting its report to the Committee, the independent advisory panel's mandate is concluded,

(f) for the purposes of the independent advisory panel carrying out its mandate, the Committee may, at the request of and on behalf of the independent advisory panel, do any of the following:

(i) request access to and the use of any information and statistics that the independent advisory panel considers relevant to its mandate, including any information and statistics gathered and input received by the Electoral Boundaries Commission most recently appointed under the Electoral Boundaries Commission Act, and any records held by the Legislative Assembly Office;

(ii) request advice, information and assistance from the Office of the Chief Electoral Officer;

(iii) request any person to provide the independent advisory panel with advice that the independent advisory panel considers advisable or necessary;

(iv) direct the Legislative Assembly Office to provide administrative support to the independent advisory panel as required,

(g) the Committee be authorized to pay the following:

(i) remuneration, and travelling and living expenses, of the independent advisors as it relates to carrying out the independent advisory panel's mandate;

(ii) reasonable disbursements incurred by the independent advisory panel for the effective conduct of its responsibilities,

(h) if the independent advisory panel submits more than one report to the Committee, the report of a majority of the members of the independent advisory panel is the report of the independent advisory panel, but if there is no majority, the report of the chair is the report of the independent advisory panel,

(i) as soon as practicable after receiving the independent advisory panel's report the Committee

(i) may convene to review the report, including making observations in respect of the report, and

(ii) on conclusion of its review, if any, must submit the report to the Legislative Assembly no later than November 2, 2026,

(j) the Committee continues despite a prorogation of a session and may, without leave of the Legislative Assembly, meet during a period when the Legislative Assembly is adjourned or prorogued, and

(k) on the Committee submitting the report to the Legislative Assembly, the Committee's mandate is concluded.

APPENDIX 2

The Electoral Boundaries Commission Act



Province of Alberta

ELECTORAL BOUNDARIES COMMISSION ACT

Revised Statutes of Alberta 2000
Chapter E-3

Current as of May 14, 2026

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Note

All persons making use of this consolidation are reminded that it has no legislative sanction, that amendments have been embodied for convenience of reference only. The official Statutes and Regulations should be consulted for all purposes of interpreting and applying the law.

ELECTORAL BOUNDARIES COMMISSION ACT

Chapter E-3

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HER MAJESTY, by and with the advice and consent of the Legislative Assembly of Alberta, enacts as follows:

Definition

1 In this Act, "Commission" means an Electoral Boundaries Commission appointed pursuant to section 2.

1990 cE-4.01 s1

Part 1
Electoral Boundaries Commissions

Electoral Boundaries Commission

2(1) From time to time as required by this Act, an Electoral Boundaries Commission is to be appointed consisting of

(a) a chair appointed by the Lieutenant Governor in Council, who must be one of the following:

(i) the Ethics Commissioner;

(ii) the Auditor General;

(iii) the president of a post-secondary educational institution in Alberta;

(iv) a judge or retired judge of any court in Alberta;

(v) a person whose stature and qualifications are, in the opinion of the Lieutenant Governor in Council, similar to those of the persons referred to in subclauses (i) to (iv),

(b) 2 persons, who are not members of the Legislative Assembly, appointed by the Speaker of the Legislative Assembly on the nomination of the Leader of His Majesty's loyal opposition in consultation with the leaders of the other opposition parties represented in the Legislative Assembly, and

(c) 2 persons, who are not members of the Legislative Assembly, appointed by the Speaker of the Legislative Assembly on the nomination of the President of the Executive Council.

(2) The Chief Electoral Officer is to provide advice, information and assistance to the Commission.

(3) With respect to the persons appointed under subsection (1)(b), one must be resident in a city and the other resident outside a city at the time of their appointment.

(4) With respect to the persons appointed under subsection (1)(c), one must be resident in a city and the other resident outside a city at the time of their appointment.

(5) Persons appointed under subsection (1) must be Canadian citizens, residents of Alberta and at least 18 years of age.

RSA 2000 cE-3 s2;AR 217/2022

Function

3 The function of a Commission is to review the existing electoral boundaries established under the *Electoral Divisions Act* and to make proposals to the Legislative Assembly as to the area, boundaries and names of the electoral divisions of Alberta in accordance with the rules set out in Part 2.

1990 cE-4.01 s3;1995 c10 s3

Remuneration

4(1) The members of a Commission may be paid the remuneration prescribed by the Lieutenant Governor in Council for their services on the Commission.

(2) The members of a Commission may be paid their reasonable travelling and living expenses while away from their ordinary place of residence in the course of their duties as members at the rates the Lieutenant Governor in Council prescribes.

1990 cE-4.01 s4

Time of appointment

5(1) A Commission is to be appointed on or before October 31, 2016.

(2) Subsequent Commissions are to be appointed during the first session of the Legislature following every 2nd general election after the appointment of the last Commission.

(3) Notwithstanding subsection (2), if less than 8 years has elapsed since the appointment of the last Commission, the Commission is to be appointed

(a) no sooner than 8 years, and

(b) no later than 10 years

after the appointment of the last Commission.

RSA 2000 cE-3 s5;2001 c23 s3;2009 c19 s2;2016 c6 s2

Report to Speaker

6(1) The Commission shall, after considering any representations to it and within 7 months of the date on which the Commission is appointed, submit to the Speaker of the Legislative Assembly a report that shall set out the area, boundaries and names of the proposed electoral divisions and reasons for the proposed boundaries of the proposed electoral divisions.

(2) On receipt of the report, the Speaker shall make the report public and publish the Commission's proposals in The Alberta Gazette as soon as possible.

(3) If the office of Speaker is vacant, the report shall be submitted to the Clerk of the Legislative Assembly, who shall comply with subsection (2).

1990 cE-4.01 s6;1995 c10 s5

Public hearings

7(1) The Commission must hold public hearings both

(a) before its report is submitted to the Speaker, and

(b) after its report has been made public,

at the places and times it considers appropriate to enable representations to be made by any person as to the area and boundaries of any proposed electoral division.

(2) The Commission shall give reasonable public notice of the time, place and purpose of any public hearings held by it.

1990 cE-4.01 s7;1993 c2 s8

Amendment of report

8(1) The Commission may, after considering any further representations made to it and within 5 months of the date it submitted its report, submit to the Speaker a final report.

(2) On receipt of the report, the Speaker shall make it public and publish it in The Alberta Gazette.

(3) If the office of Speaker is vacant, the report shall be submitted to the Clerk of the Legislative Assembly, who shall comply with subsection (2).

1990 cE-4.01 s8;1995 c10 s6

Commission report

9 If there is more than one report submitted under section 6 or 8, the report of a majority of the members of the Commission is the report of the Commission, but if there is no majority, the report of the chair is the report of the Commission.

1995 c10 s7

Report to Assembly

10 After the Commission has complied with sections 6 to 8, the final report of the Commission shall,

(a) if the Legislative Assembly is sitting when the report is submitted, be laid before the Assembly immediately, or

(b) if the Legislative Assembly is not then sitting, be laid before the Assembly within 7 days after the beginning of the next sitting.

1990 cE-4.01 s9;1995 c10 s8

New electoral divisions

11(1) If the Assembly, by resolution, approves or approves with alterations the proposals of the Commission, the Government shall, at the same session, introduce a Bill to establish new electoral divisions for Alberta in accordance with the resolution.

(2) The Bill is to be stated to come into force on the day that a writ is issued under section 40 of the *Election Act* for the next general election.

RSA 2000 cE-3 s11;2010 cE-4.2 s6

Part 2
Redistribution Rules

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).

RSA 2000 cE-3 s12;2009 c19 s3;2016 c6 s3

Electoral divisions

13 The Commission shall divide Alberta into 91 proposed electoral divisions.

RSA 2000 cE-3 s13;2009 c19 s4;2024 c17 s3;2026 c7 s2

Relevant considerations

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.

RSA 2000 cE-3 s14;2024 c17 s3

Population of electoral divisions

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 a 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.

RSA 2000 cE-13 s15;2009 c19 s5

APPENDIX 3

Addendum to the Majority Report by the Hon. Dallas K. Miller, Chair of the 2025-2026 Electoral Boundaries Commission

Addendum to the Majority Report

BY THE HONOURABLE DALLAS K. MILLER, CHAIR

Much of the objection to our interim report is based on the loss of two rural seats. I lament this, as do my fellow Commissioners. Unlike the minority, however, I do not view separating communities of interest, proposing maps no one asked for, and having electoral divisions in Calgary with populations more than 20% above the provincial average as an appropriate solution to this problem. On the contrary, such solutions are antithetical to my duty to the apply the law. In other words, my hands are tied by the legislation and the case law. The problem this Commission faced, in my view, is not the statutory criteria for drawing electoral districts. Rather, it is the fact that the size of the legislature was increased by only 2%, while the population increased by 20%.

This problem is not unlike the population restrictions faced by the 1992 Electoral Boundaries Commission, as explained in its final report. That Commission's final report included five separate reports – one written by each member. At this stage of our deliberations, it is easy for me to understand why that occurred. It is important to remember that the 1992 report resulted in the second Alberta Reference before the Alberta Court of Appeal.

This current majority report is the product of trade-offs, compromises, and give and take. Putting "water in your wine" was a phrase used often around our Commission table. The list of four recommendations on page 60 of this report is no exception to this negotiation process. There is one recommendation that could not be consented to by the remaining members of the majority of the Commission and, by inference, the minority.

Due to my deep concern regarding the unconstitutionality and administrative law problems of the minority report, I find it necessary to make one further recommendation that my fellow Commissioners cannot consent to. I am reasonably certain that, had we been given 91 electoral divisions, there would be no loss of any seats outside of Edmonton and Calgary. My majority colleagues do not agree with me on this point. That is why I am alone in making this recommendation.

This fifth recommendation is formulated for the express purpose of dissuading the Legislature from accepting the minority report. As Chairman of this Electoral Boundaries Commission, I strongly recommend to the Legislature a fifth recommendation, to be added to our list on page 60 as follows:

Recommendation 5: In the circumstance that the Legislative Assembly of Alberta finds that it cannot concur in the proposals of the majority of the Electoral Boundaries Commission in its final report to remove two electoral divisions from areas outside of the Cities of Edmonton and Calgary, the majority of the Commission recommends that the Assembly make amendments to the *Electoral Divisions Act*, increasing the number of electoral divisions from 89 to 91 for the next general election, and restore the two electoral divisions that this Commission has removed. The rest of the province as we propose must be maintained to the extent possible. This would need to be studied by an all-party Select Special Committee or other equivalent Legislative Committee in accordance with its Standing Orders. However, restoration of the two electoral divisions should:

a) have no impact on any electoral division in Airdrie or containing territory south of Airdrie's southernmost border, with the exception of Drumheller-Stettler;

b) have no impact on any electoral division north of the North Saskatchewan River in Edmonton;

c) result in all electoral divisions south of the North Saskatchewan River in Edmonton reverting to the map outlined in the interim report, with the possible exception of including Nisku in Edmonton-South East if the all-party committee wishes to restore Leduc and Beaumont being in the same electoral division; and

d) consider restoring an electoral division mostly consisting of Clearwater County and western Mountain View County as an electoral division with s. 15(2) status under the *Act*.

In addition, I wish to clarify that I do not consider all of the minority's hybrids to be unreasonable, even the ones the majority did not adopt. We did not adopt the hybridization of Bearspaw or Springbank with Calgary, nor the extent of the hybridization of Lethbridge, for reasons explained elsewhere in this report. However, I do not consider those hybrids necessarily unreasonable or procedurally unfair, given the extensive submissions about them. Indeed, had the minority chosen to advocate for them, instead of insisting upon an otherwise unreasonable and unconstitutional map, I may well have agreed with them. This is unlike the other hybrids the minority has proposed in Airdrie, Calgary, Chestermere, Cochrane, Red Deer, and St. Albert. The minority's radical about face and substantive unreasonableness regarding these hybrids, to say nothing about the many other administrative and constitutional law problems with their report, is not something that I can condone. This is a reason I have found myself writing this Addendum.

Lest there be any confusion about this issue, my writing this Addendum in no way detracts from the majority report representing the views of a majority of the Commission.

The Honourable Dallas K. Miller, Chair

APPENDIX 4

Response to the Minority Report in the 2025-2026 Electoral Boundaries Commission Final Report

X. Response to the Minority Report

In October 2025, the Commission submitted a unanimous report to the Speaker of the Legislature. From then until late January 2026, when all public hearings and written submissions had been received, the Commission focused on fine-tuning and amending our interim report. Our goal was to do the best we could to create a map of 89 electoral divisions that was in line with the *Act,* was constitutional based on the tools available to us, and provided "effective representation" for Albertans. In late January, the minority departed substantially from that goal.

The use of the term "Commission" in the minority report is inapplicable, and it should be read as referring to the minority of the Commission. Further, to claim to use the underlying principles, philosophy, and jurisprudence from the interim report and the majority report is clearly not warranted, considering what they propose.

We are of the view that the minority's proposed maps violate the principle of procedural fairness, unreasonably apply the statutory considerations, and likely violate s. 3 of the *Charter*. Each of these concerns is outlined in more detail below.

First, the minority's approach violates the principles of procedural fairness, and, relatedly, the values underlying s. 3 of the *Charter*. The interim report was unanimous. The about-face by the minority did not give the public any notice of what the minority proposes. We wish to highlight but a few of the most egregious examples. To begin, their changes to Red Deer, Cochrane, and Chestermere are the product of absolutely no public input or engagement. Moreover, in the cases of Airdrie and St. Albert, there was no public input or engagement for the radically different approach to hybrid electoral boundaries taken by the minority as compared to the interim report. The Commission received no public support whatsoever for the minority's maps for these cities; nor are they necessary to make other changes that do have public support. This is a clear infringement of the basic rules of fairness and due process involving people in those communities. Furthermore, it goes contrary to the underlying values behind s. 3. As noted by Justice Cory in *Carter*,[42] s. 3 should at least *consider* the process in which boundaries are drawn, as well as their substantive appropriateness. Further, most provinces now use independent electoral boundary commissions as contemplated by Justice Cory. At the very least, then, there may be a *Charter* value of a procedurally fair and independent process in creating electoral boundaries — something the minority does not address in their reasons.

Second, the minority's reasons are substantively unreasonable. They justify hybrids in principle (a matter the majority agrees with) as a means to ensure effective representation for rural areas, without taking away urban seats to do so. This principle would mean that if a rural electoral division must be consolidated due to low populations, hybrid electoral divisions could be created (for example, around Lethbridge) to ensure that rural electoral divisions do not become unnecessarily large. However, they improperly use hybrid electoral divisions to do the opposite: they retain every rural electoral division from 2017, while also hybridizing Calgary, Red Deer, Airdrie, Cochrane, Chestermere, and Lethbridge, leading to *additional* rural representation at the *expense* of urban residents. More specifically, the minority:

1. Has hybridized the City of Red Deer, but has not correctly employed hybrids in order to expand the electoral division of Rimbey-Rocky Mountain House-Sundre to include a higher population. In theory, hybrids would collapse the rural electoral divisions around the city into smaller sized hybrid electoral divisions, thereby requiring less purely rural seats to represent the areas to its west. The electoral division to its west could therefore easily shift eastwards slightly. However, the minority opted to keep the exact same amount of rural electoral divisions in this area, thus entirely defeating the purpose identified by the Alberta Court of Appeal for using hybrids;

2. Hybridized the City of Airdrie into four electoral divisions, which do not have strong communities of interest and which have indefensible variations in population. The hybrids range from 7% above the provincial average to 10% below the provincial average, without sufficient justification. Further, the minority does not even discuss or attempt to justify the fact that their proposed electoral division of Olds-Didsbury-Three Hills includes a portion of Airdrie;

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42 In dissent, but the majority did not address this point.

3. Applied s. 15(2) status to their proposed electoral division of Rocky Mountain House-Banff Park, which appears not to be a good-faith use of the *Act*. A large portion of Banff National Park where no one lives was brought into their proposed electoral division. But for what purpose have they drawn this electoral division in this way? We suspect the purpose of this change was to create the conditions for s. 15(2)(a) and (e) to apply, and therefore to reach three of the five criteria in that section, thereby allowing a high deviation from the average population. This cannot be a good faith use of s. 15(2) of the *Act*.

We appreciate that "shoehorning" some electoral divisions is necessary when only 89 electoral divisions have been given to us. However, the minority report uses sparsely detailed maps lacking basic features like the delineation of city limits in Calgary and Edmonton (to demonstrate which electoral divisions are hybrids, or not). They also include highly unusual boundaries for many of their new electoral divisions. This offends s. 14(e) of the *Act*, which mandates that the Commission consider "the desirability of *understandable and clear boundaries*." The maps proposed by the minority are anything but clear and understandable. As an example, Calgary-Foothills-Airdrie West and Calgary-Nolan Hill-Cochrane look strange, with bits and pieces of various municipalities and rural areas patched together without rhyme or reason. These two electoral divisions are *adjacent* to each other, and there is no excuse for not having clear boundaries that incorporate communities of interest. Why would a resident of Nolan Hill in Calgary be included in a hybrid electoral division with Cochrane, while neighbourhoods to their west (such as Rocky Ridge or Tuscany), which are closer to Cochrane and along the same highway are included in a mostly urban Calgary electoral division?

Finally, we note that almost every hybrid electoral division the minority has proposed was justified based on the idea that "residents move fluidly between jurisdictions for work, education, health care, and commerce" (or words to that effect). This kind of general statement may have some logic to it for areas immediately adjacent to the city boundary. However, a boilerplate justification for all hybrids is simply not sufficient to fundamentally redraw almost every electoral division in Calgary.

In addition, the minority has inflated the population of most electoral divisions in the northeast of Calgary, while decreasing the average population of electoral divisions in the south of the City, without a valid statutory or constitutional reason to do so. They then unreasonably attempt to justify their approach by relying on the number of "electors" that reside in the northeastern boundaries as being lower than the number in south Calgary. This is an extraneous consideration under the *Act*. Under s. 15(1) of the *Act*, the Commission's mandate is to ensure that the *population* of each electoral division is within 25% of the provincial average *population*. This is a specific mandate. It would therefore go against the Legislature's intent to read in "electors" as a relevant consideration, when the Legislature has deliberately chosen *not* to use "electors" as the basis for drawing electoral boundaries, even though it could have. Specific statutory references defeat general or open-ended considerations, especially where they stray from the logic of the *Act*, such as here. In addition, the population of electors would be, at most, a marginal consideration permitted by s. 14(f) of the *Act* ("any other factors the Commission considers appropriate"), and certainly cannot *overwhelm* the prime numerical consideration, which is population.

Third, the minority boundaries, particularly in Calgary, run a serious risk of violating s. 3 of the *Charter*. In addition to the factors above that make their decision unreasonable and a violation of basic procedural fairness, they also ignore the principle that departures from voter parity are warranted, *but only to increase effective representation*. As the majority has repeatedly emphasized, voter parity is not the polar star of electoral redistricting in Canada. This is why the majority has noted that it is reasonable for rural and especially northern Alberta to have lower average populations than Calgary and especially Edmonton. However, it is challenging to justify radically different levels of parity between similarly situated voters. The minority proposes electoral divisions in central and northeast Calgary approaching the legal maximum, while others in south Calgary are at or below the provincial average. In *Carter*, Justice McLachlin stated specifically that departures from parity should be justified only on the grounds that it leads to more effective representation. It is difficult to see how creating electoral divisions with highly unevenly distributed populations *within the same city* creates more effective representation. Their proposal is particularly troubling having been written by two individuals who do not reside in Calgary and thus do not know the city particularly well.

Building on the problems outlined above, we note that the minority report seems to be motivated by other considerations. To put it starkly, 15 electoral divisions mostly in central and northeast Calgary are approximately

11% above the average provincial population. By contrast, 14 electoral divisions mostly in the south and west of Calgary have an average variance of just 2% above the provincial average. What might be the minority's true motivation for this? Our friends south of the border may have a term for this type of redistricting.

The minority maps use contrived explanations for their proposed electoral divisions, such as parity of "electors" and the general utility of hybrids (without implementing them in accordance with their own logic), while at the same time making a complete 180-degree turn from what the Commission unanimously proposed in our interim report. The minority made a complete about face with new electoral maps without *any* public participation. These boundaries not only do not provide effective representation, but are entirely unfair to impose on Albertans without significant submissions as to the strength of their proposed communities of interest and the impact on their ability to enable effective representation.

No previous Electoral Boundaries Commission has ever had a minority report which provided maps of alternative electoral boundaries or constituency-by-constituency descriptions. That is not to criticize the report in principle; rather, it is to explain that with the extreme change of approach taken by the minority, it was not practical for the GIS department at Elections Alberta to dedicate the necessary time to factor in this late change. The majority objects in the strongest terms to this unconstitutional minority report and wishes to warn the Legislature against its adoption.

APPENDIX 5

Biographies of the Independent Advisory Panel Members

Biographies of the Independent Advisory Panel Members

The Honourable Brian O'Ferrall, K.C., is a retired Justice of the Alberta Court of Appeal and a former Judge of the Provincial Court of Alberta (Small Claims Division).

Brian was raised in Edmonton (Parkallen), but worked in Calgary most of his career.

Brian holds a BA in Political Science from the University of Alberta in Edmonton, a Journalism Degree from Carleton University in Ottawa and an LLB from the University of Alberta.

As an energy regulatory lawyer for 30 years with Ballem McDill, Bennett Jones and McLennan Ross, Brian represented proponents and opponents of energy projects before regulatory tribunals and the courts. As a surface rights lawyer, Brian represented landowners and expropriating authorities before the Surface Rights Board, the Land Compensation Board and at all levels of court. As an environmental lawyer, Brian appeared before the Natural Resources Conservation Board and the Environmental Appeal Board and was a member of the 1990 Environmental Legislation Review Panel chaired by Banff-Cochrane MLA Brian Evans, K.C., which led to the enactment of the Environmental Protection and Enhancement Act.

As a journalist, Brian worked for the *Ottawa Citizen*, the *Toronto Globe and Mail*, CFCN Television, CHQT, CHQR, CHED and CKXL. As a radio and television newsman, Brian covered the last years of the Social Credit tenure in government and the first years of Premier Lougheed's tenure. He also covered City Hall in Calgary during portions of the mayoralities of Jack Leslie and Rod Sykes.

Darwin K. Durnie brings more than 40 years of public- and private-sector leadership in municipal infrastructure, regional service delivery, transportation, emergency management and critical infrastructure. His career has included extensive work with all orders of government, and community and business leaders, giving him a practical understanding of how communities connect, collaborate and plan for growth.

Darwin was named one of the American Public Works Association's Top Ten Public Works Leaders of the Year in 2015. He is a past president of the Canadian Public Works Association and a Public Works Leadership Fellow. His public and community service have been recognized with the Queen Elizabeth II Diamond Jubilee Medal and Platinum Jubilee Medal.

Gerard Kennedy is an Associate Professor and Associate Dean of Graduate Studies in the Faculty of Law at the University of Alberta. His expertise lies at the intersection of procedural law and public law, and he has over 40 publications in these areas. He holds a JD from Queen's University, an LLM from Harvard Law School and a PhD from Osgoode Hall Law School. Prior to joining the U of A, he was a faculty member at the University of Manitoba and a litigation associate at Osler, Hoskin & Harcourt LLP in Toronto. He remains an active member of the legal profession as a member of the Alberta, Manitoba and Ontario Bars. He serves on the Alberta Judicial Council and Federal Courts Rules Committee and chairs the Advisory Board of the Centre for Constitutional Studies.

Professor Kennedy's expertise in constitutional and administrative law has led to his work for Ontario's Far North Electoral Boundaries Commission in 2017 and Alberta's Electoral Boundaries Commission in 2025-2026. He was a writer and advisor for both of these commissions, becoming familiar with Canadian case law on redistricting.

Brent Robinson was born and raised in Okotoks, Alberta, and has lived there with his family since 2011. Brent earned a BA with Distinction in Economics and Political Science from the University of Calgary in 2001 and an LLB from the University of British Columbia in 2004. He also has a graduate diploma in Data Science and Analytics from the University of Calgary. He has been a member of the Law Society of Alberta since 2005. He served as a Councillor for the Town of Okotoks from 2021 to 2025, which included service on committees of the Calgary Metropolitan Region Board and the Foothills County and Town of Okotoks Intermunicipal Committee. Brent is a lifelong sports fan who has served on various boards involving amateur lacrosse. He now spends a large part of his summers travelling to communities across Alberta to help organize and watch lacrosse as the Executive Director of the Alberta Lacrosse Association.

The Honourable Monte Solberg, P.C., was born in Calgary, Alberta, but grew up in Drumheller, Alberta and Rosetown, Saskatchewan. He attended the University of Saskatchewan before returning to the family radio business. He later became the General Manager of Q 13 Radio Brooks and then CHUM Radio Alberta before becoming the Member of Parliament for Medicine Hat in 1993, a position he held for 15 years. In 2006 Prime Minister Harper appointed him to serve as Minister of Citizenship and Immigration and then Minister of Human Resources and Social Development.

During his political career he knocked on doors, attended constituency association meetings and spoke at nomination meetings in dozens of communities across Alberta. As the longtime Finance critic for his party, he heard testimony from hundreds of not-for-profit groups, business organizations and individuals from Alberta during annual Finance Committee hearings.

Upon leaving politics in 2008, he and his wife, Deb, moved to Calgary, where he founded New West Public Affairs, which serves clients across Canada from operations in Calgary, Edmonton, Toronto and Ottawa. Monte also sits on the Nature Conservancy of Canada's Alberta Advisory Committee. In addition, he is a co-chair of Generate Canada. He and his wife split their time between Calgary and the Alberta Badlands near Drumheller.

APPENDIX 6

Composite Maps

Composite Maps

a) Lac Ste. Anne and Impacted Electoral Divisions 199

b) Leduc-Beaumont and Impacted Edmonton Electoral Divisions 200

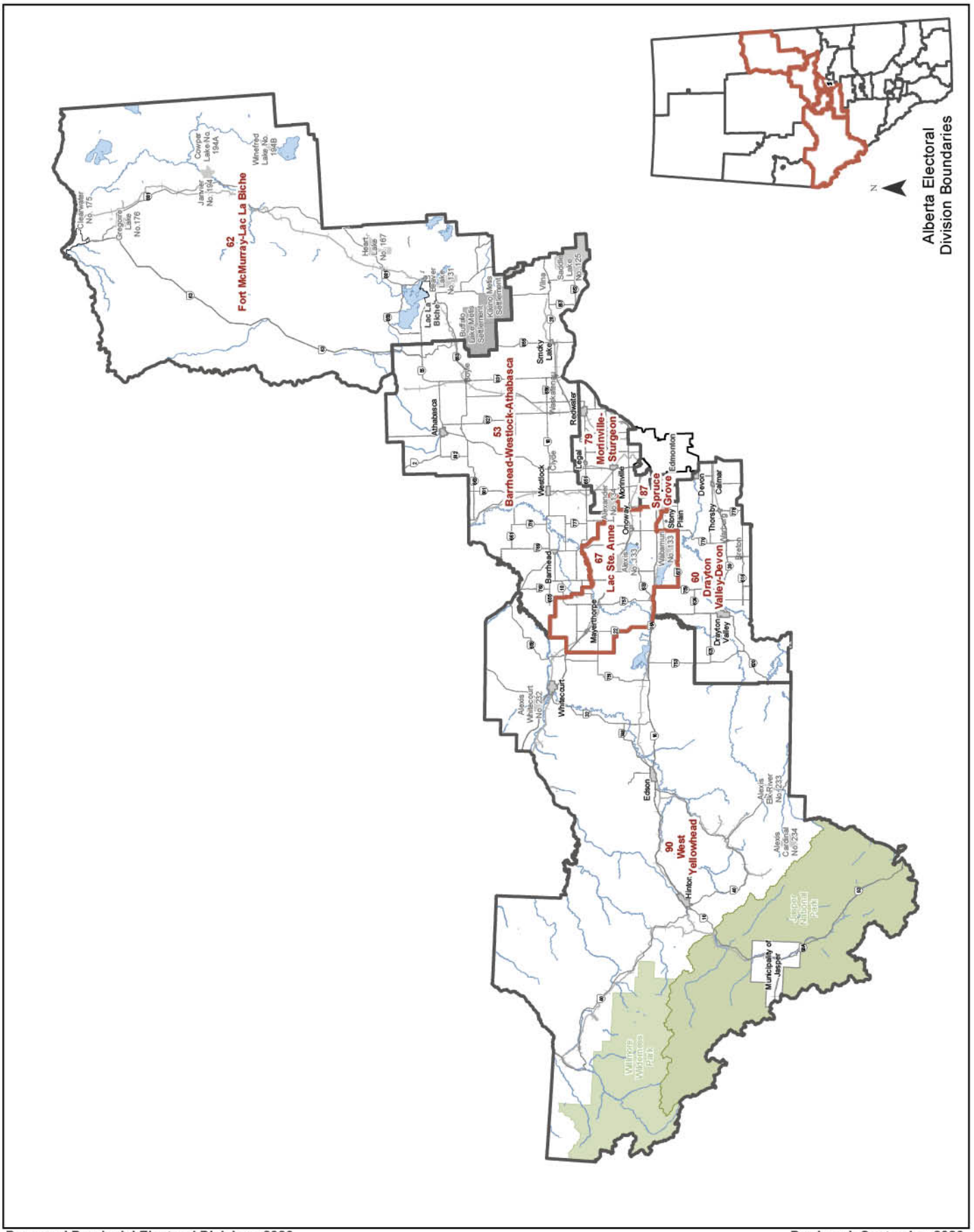
c) Rocky Mountain House-Sundre and Banff-Canmore-Diamond Valley Electoral Divisions 201

d) Highway 2 Corridor Electoral Divisions 202

e) Calgary Electoral Divisions 203

f) Southern Alberta Electoral Divisions 204

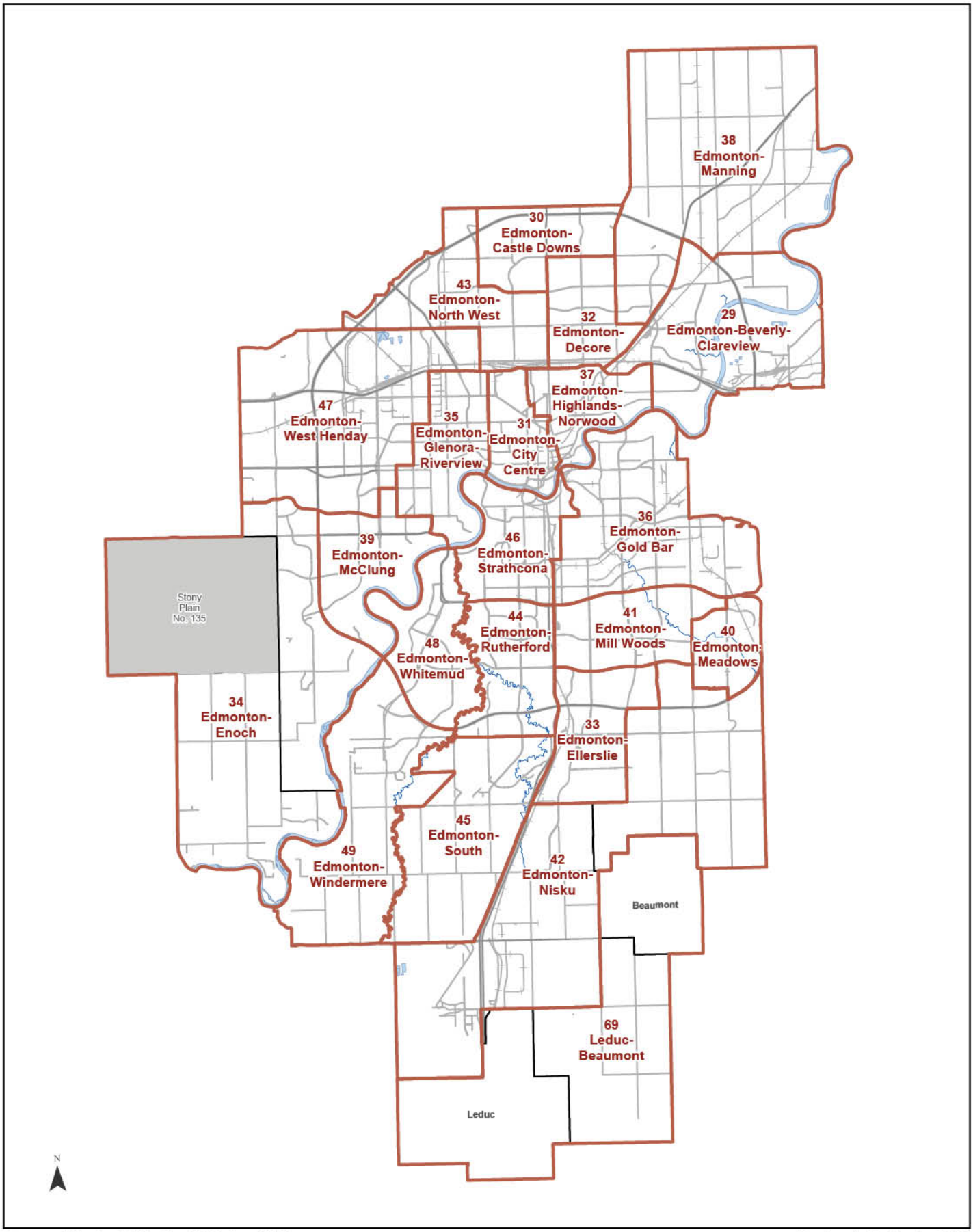
Lac Ste. Anne and Impacted Electoral Divisions



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Leduc-Beaumont and Impacted Edmonton Electoral Divisions



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

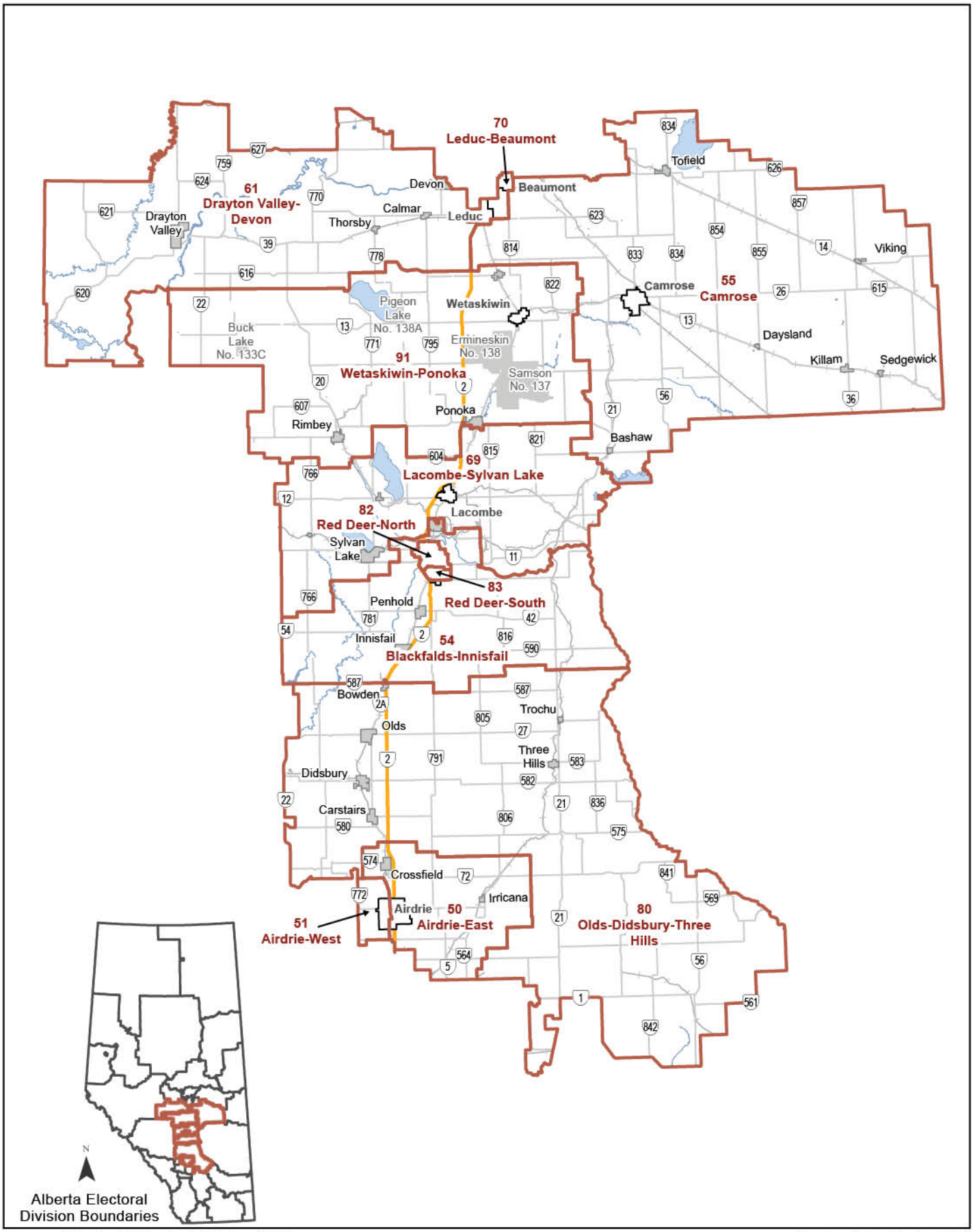
Rocky Mountain House-Sundre and Banff-Canmore-Diamond Valley Electoral Divisions



Proposed Provincial Electoral Divisions 2026

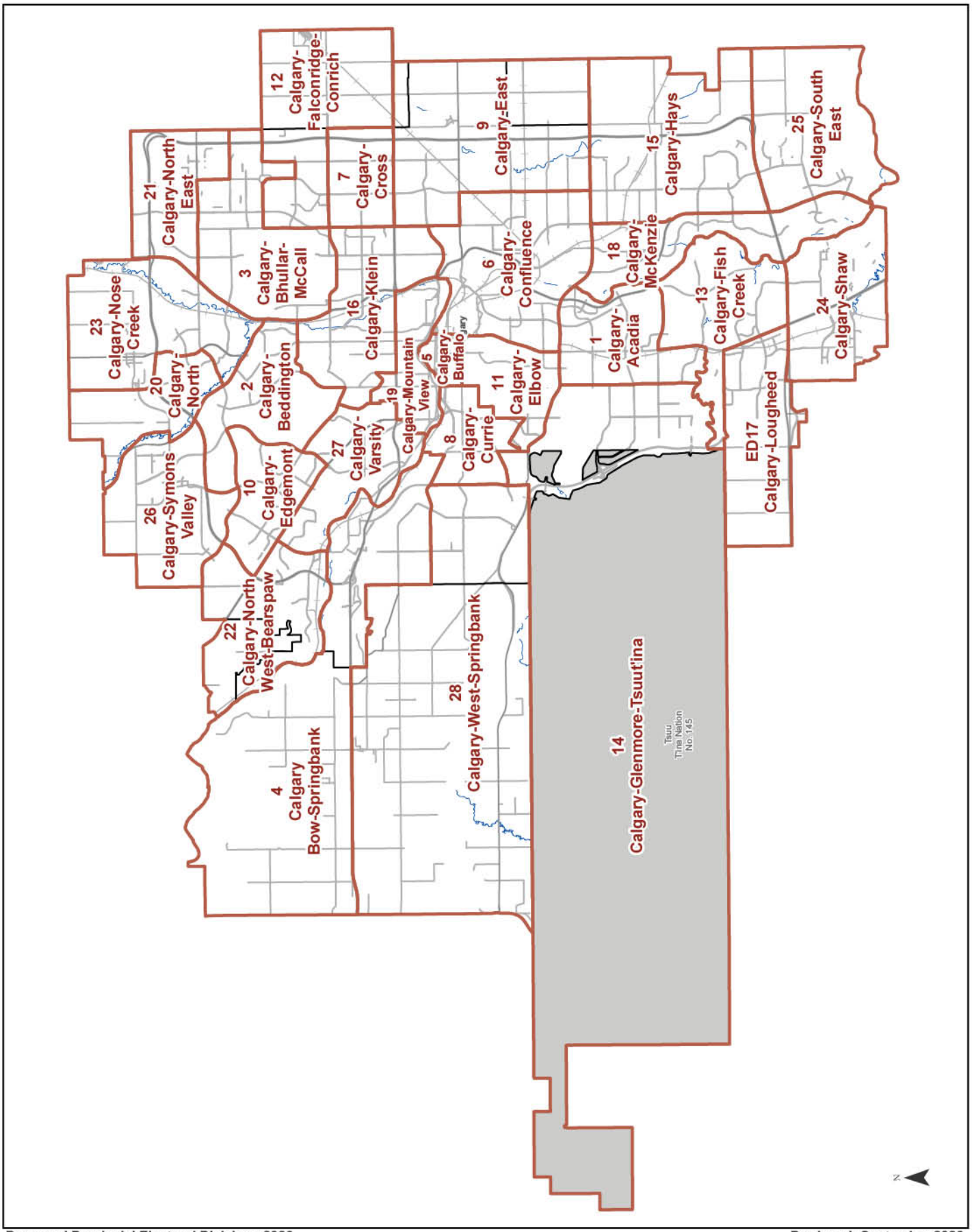
Produced: September 2026

Highway 2 Corridor Electoral Divisions



Proposed Provincial Electoral Divisions 2026 **Produced: September 2026**

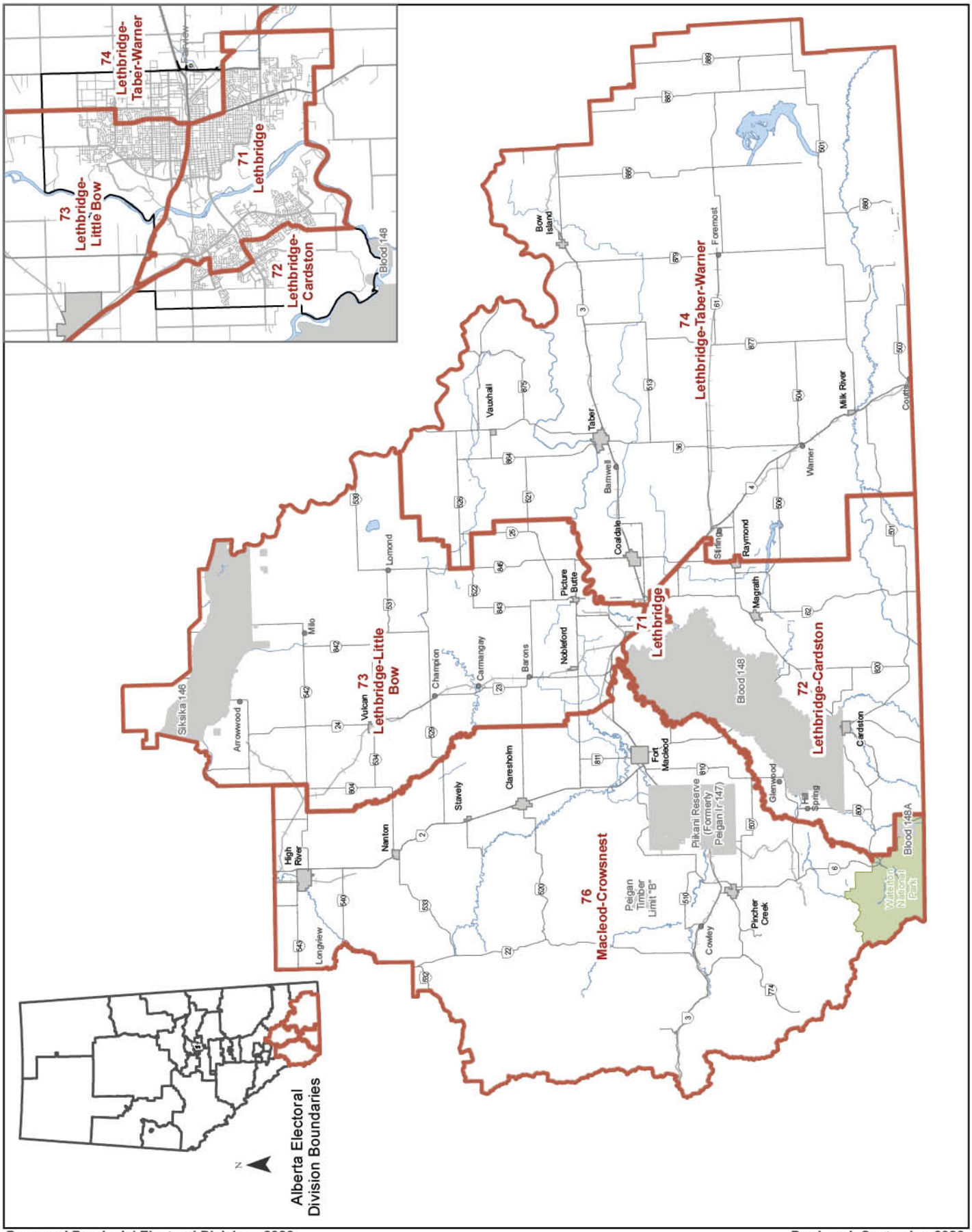
Calgary Electoral Divisions



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Southern Alberta Electoral Divisions



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

APPENDIX 7

Electoral Division Populations

Electoral Division Populations

ED Number	Proposed ED Name	Estimated Population	Average ED Population	Difference from Average	Percentage Difference	Area in km2
1	Calgary-Acadia	55789	53722	2067	4%	27
2	Calgary-Beddington	56024	53722	2302	4%	30
3	Calgary-Bhullar-McCall	55887	53722	2165	4%	41
4	Calgary-Bow-Springbank	58673	53722	4951	9%	119
5	Calgary-Buffalo	58777	53722	5055	9%	4
6	Calgary-Confluence	58632	53722	4910	9%	49
7	Calgary-Cross	59491	53722	5769	11%	16
8	Calgary-Currie	58111	53722	4389	8%	16
9	Calgary-East	58308	53722	4586	9%	68
10	Calgary-Edgemont	55141	53722	1419	3%	20
11	Calgary-Elbow	55297	53722	1575	3%	18
12	Calgary-Falconridge-Conrich	56661	53722	2939	5%	46
13	Calgary-Fish Creek	55403	53722	1681	3%	33
14	Calgary-Glenmore-Tsuut'ina	56970	53722	3248	6%	334
15	Calgary-Hays	52147	53722	-1575	-3%	63
16	Calgary-Klein	56292	53722	2570	5%	37
17	Calgary-Lougheed	59554	53722	5832	11%	34
18	Calgary-McKenzie	62772	53722	9050	17%	31
19	Calgary-Mountain View	54396	53722	674	1%	16
20	Calgary-North	57945	53722	4223	8%	23
21	Calgary-North East	54541	53722	819	2%	25
22	Calgary-North West-Bearspaw	54361	53722	639	1%	37
23	Calgary-Nose Creek	55155	53722	1433	3%	45
24	Calgary-Shaw	58171	53722	4449	8%	34
25	Calgary-South East	53551	53722	-171	0%	44
26	Calgary-Symons Valley	54797	53722	1075	2%	36
27	Calgary-Varsity	57166	53722	3444	6%	27
28	Calgary-West-Springbank	58305	53722	4583	9%	165
29	Edmonton-Beverly-Clareview	57481	53722	3759	7%	56
30	Edmonton-Castle Downs	59612	53722	5890	11%	21
31	Edmonton-City Centre	57312	53722	3590	7%	15
32	Edmonton-Decore	57959	53722	4237	8%	18
33	Edmonton-Ellerslie	53376	53722	-346	-1%	26
34	Edmonton-Enoch	56894	53722	3172	6%	146
35	Edmonton-Glenora-Riverview	56622	53722	2900	5%	26
36	Edmonton-Gold Bar	54981	53722	1259	2%	57
37	Edmonton-Highlands-Norwood	51806	53722	-1916	-4%	19
38	Edmonton-Manning	56901	53722	3179	6%	97
39	Edmonton-McClung	61859	53722	8137	15%	28
40	Edmonton-Meadows	53318	53722	-404	-1%	13
41	Edmonton-Mill Woods	59673	53722	5951	11%	24
42	Edmonton-Nisku	54521	53722	799	1%	128
43	Edmonton-North West	61226	53722	7504	14%	32
44	Edmonton-Rutherford	58082	53722	4360	8%	26
45	Edmonton-South	57522	53722	3800	7%	50
46	Edmonton-Strathcona	54093	53722	371	1%	24
47	Edmonton-West Henday	61775	53722	8053	15%	73
48	Edmonton-Whitemud	56752	53722	3030	6%	26
49	Edmonton-Windermere	54136	53722	414	1%	56

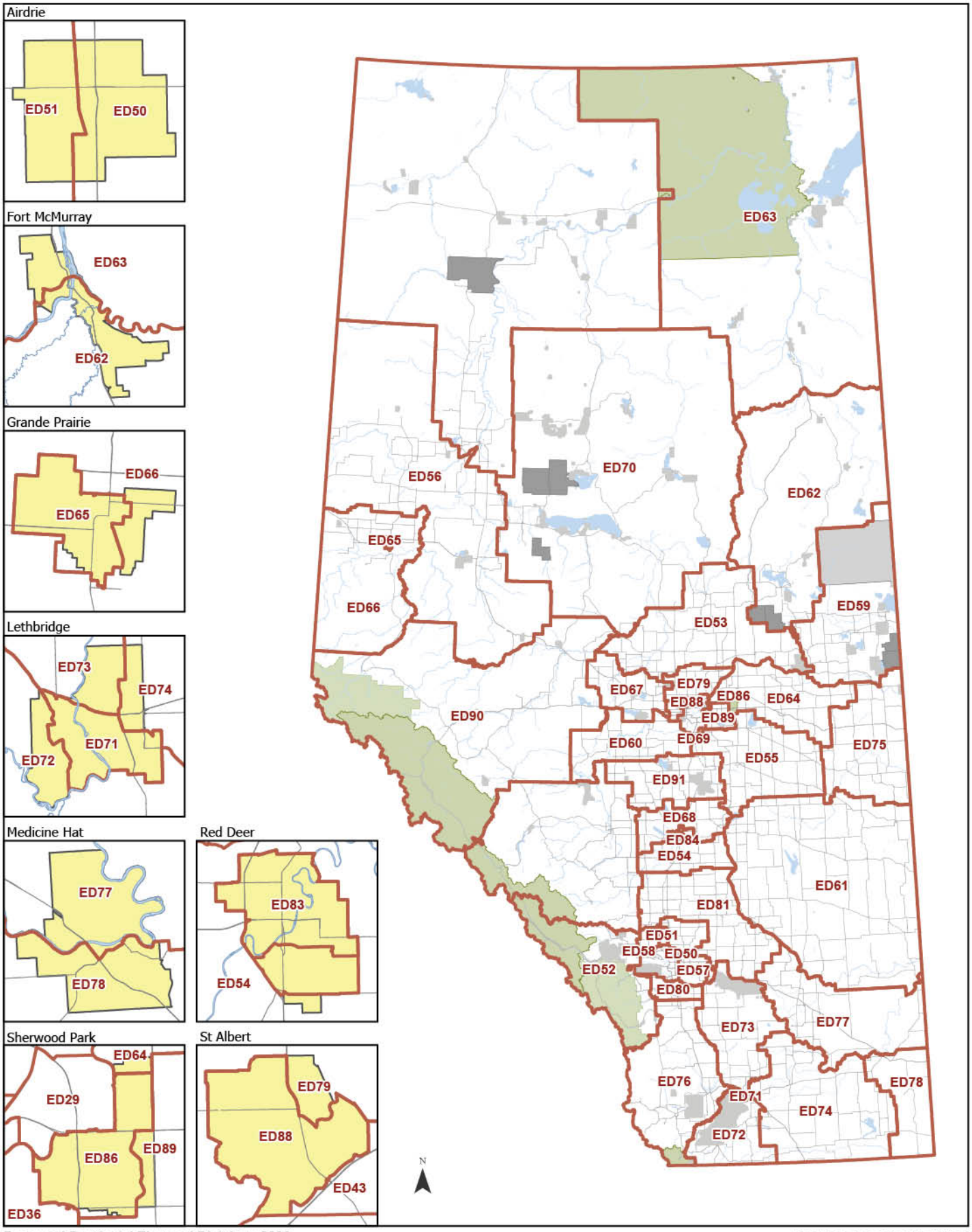
Electoral Division Populations

ED Number	Proposed ED Name	Estimated Population	Average ED Population	Difference from Average	Percentage Difference	Area in km2
50	Airdrie-East	53809	53722	87	0%	1579
51	Airdrie-West	48145	53722	-5577	-10%	195
52	Banff-Canmore-Diamond Valley	48862	53722	-4860	-9%	11483
53	Barrhead-Westlock-Athabasca	46602	53722	-7120	-13%	15750
54	Blackfalds-Innisfail	44536	53722	-9186	-17%	3557
55	Camrose	54653	53722	931	2%	10096
56	Central Peace-Notley	28715	53722	-25007	-47%	47312
57	Chestermere-Strathmore	56679	53722	2957	6%	1025
58	Cochrane	46785	53722	-6937	-13%	564
59	Cold Lake-Bonnyville-St. Paul	55809	53722	2087	4%	16704
60	Drayton Valley-Devon	44203	53722	-9519	-18%	6256
61	Drumheller-Stettler	43570	53722	-10152	-19%	38398
62	Fort McMurray-Lac La Biche	47304	53722	-6418	-12%	32317
63	Fort McMurray-Wood Buffalo	46721	53722	-7001	-13%	86353
64	Fort Saskatchewan-Vegreville	54278	53722	556	1%	8299
65	Grande Prairie	50352	53722	-3370	-6%	112
66	Grande Prairie-Wapiti	53781	53722	59	0%	16018
67	Lac Ste. Anne	51546	53722	-2176	-4%	4319
68	Lacombe-Sylvan Lake	54055	53722	333	1%	3882
69	Leduc-Beaumont	63434	53722	9712	18%	114
70	Lesser Slave Lake	30011	53722	-23711	-44%	75775
71	Lethbridge	58897	53722	5175	10%	57
72	Lethbridge-Cardston	41943	53722	-11779	-22%	5432
73	Lethbridge-Little Bow	52662	53722	-1060	-2%	8428
74	Lethbridge-Taber-Warner	52955	53722	-767	-1%	16957
75	Lloydminster-Wainwright	50139	53722	-3583	-7%	11047
76	Macleod-Crowsnest	52185	53722	-1537	-3%	13380
77	Medicine Hat-Brooks	54833	53722	1111	2%	13740
78	Medicine Hat-Cypress	54210	53722	488	1%	6117
79	Morinville-Sturgeon	53458	53722	-264	0%	2182
80	Okotoks	49853	53722	-3869	-7%	1213
81	Olds-Didsbury-Three Hills	50780	53722	-2942	-5%	10339
82	Peace River	43399	53722	-10323	-19%	109228
83	Red Deer-North	53798	53722	76	0%	74
84	Red Deer-South	59121	53722	5399	10%	31
85	Rocky Mountain House-Sundre	31540	53722	-22182	-41%	25122
86	Sherwood Park	52475	53722	-1247	-2%	71
87	Spruce Grove	52063	53722	-1659	-3%	283
88	St. Albert	59935	53722	6213	12%	57
89	Strathcona-Sherwood Park	51020	53722	-2702	-5%	767
90	West Yellowhead	51355	53722	-2367	-4%	49405
91	Wetaskiwin-Ponoka	54034	53722	312	1%	6138

APPENDIX 8

Alberta Electoral Map plus 91 Electoral Division Maps

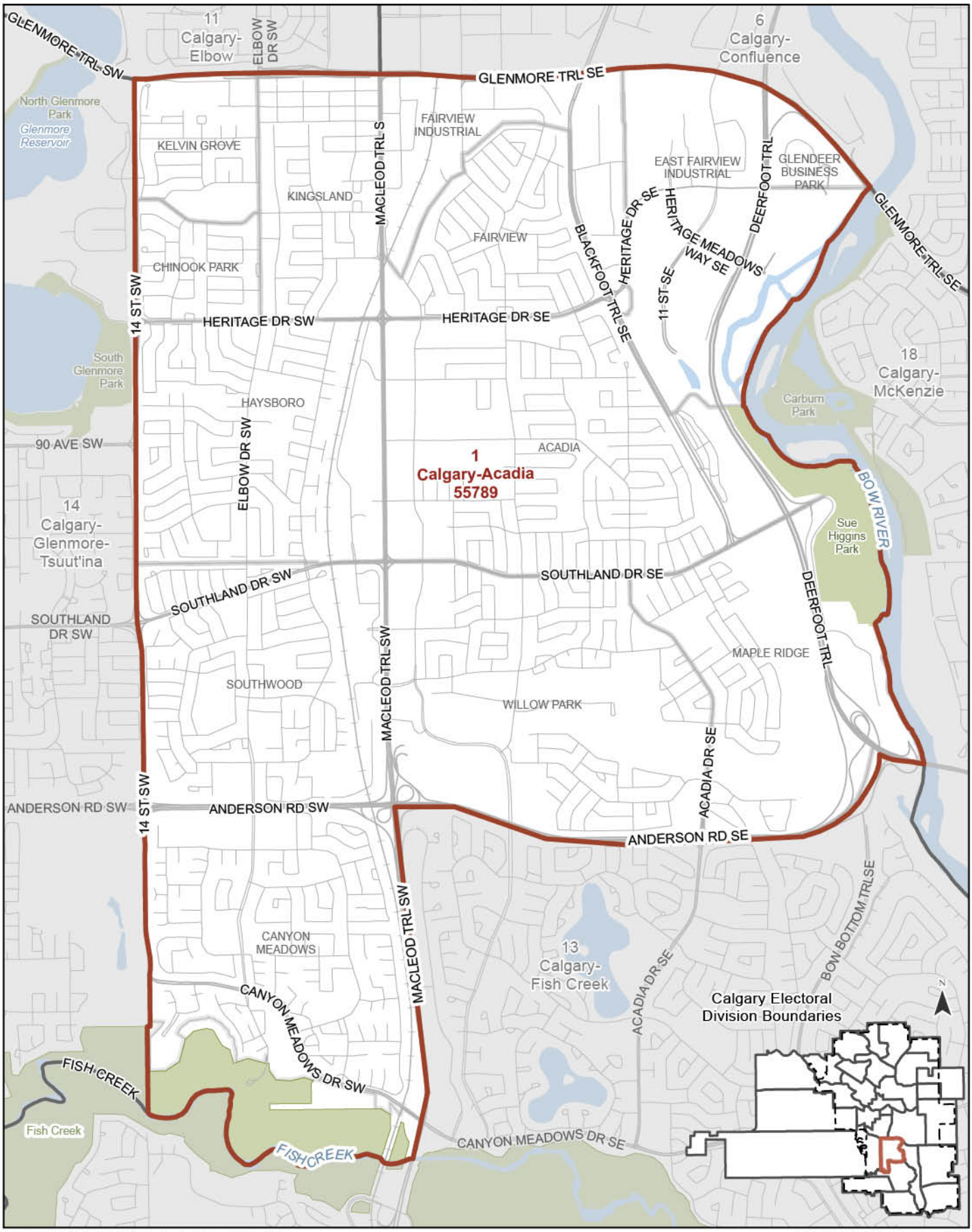
Alberta Electoral Map



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

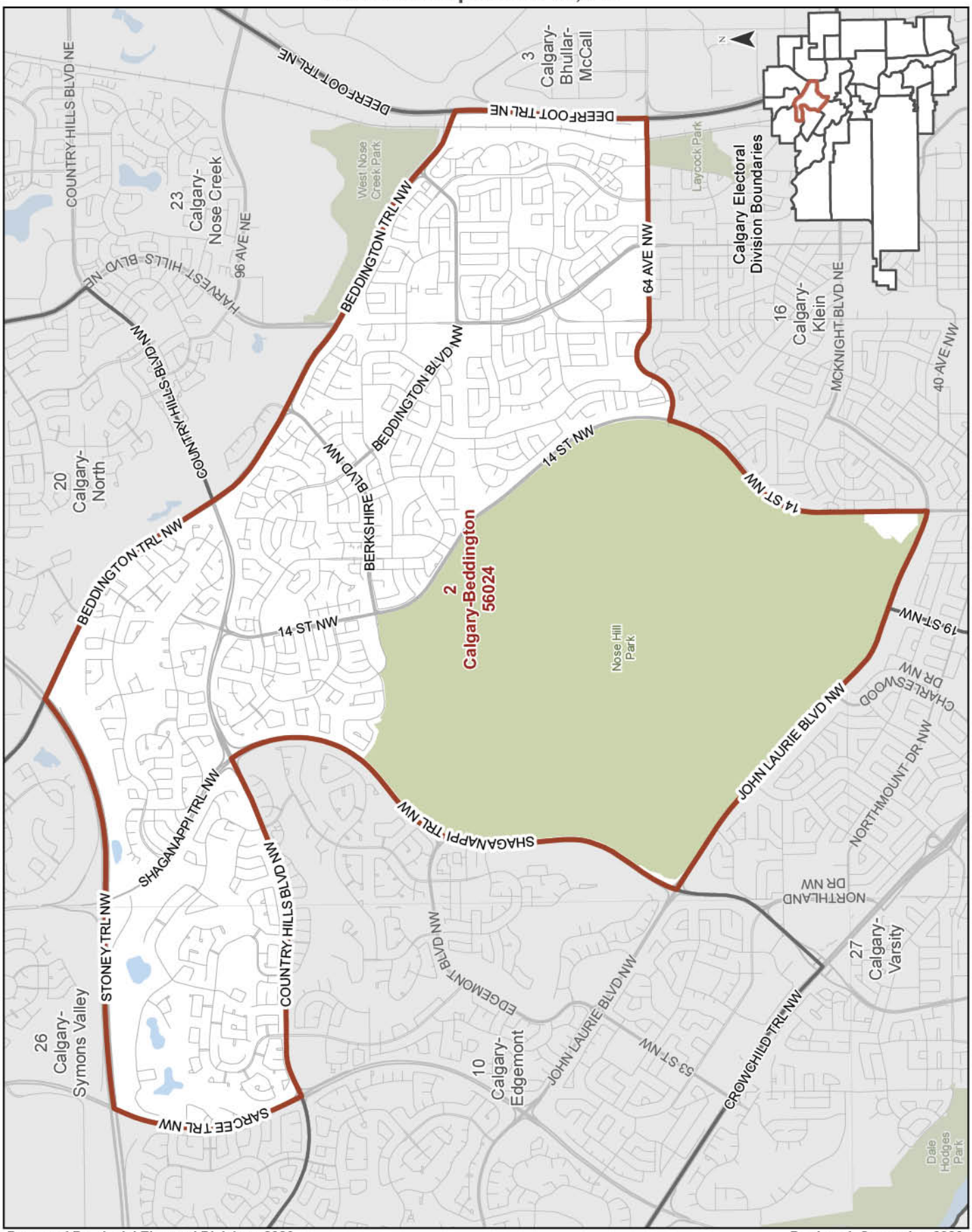
Calgary-Acadia
Estimated Population: 55,789



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Beddington
Estimated Population: 56,024

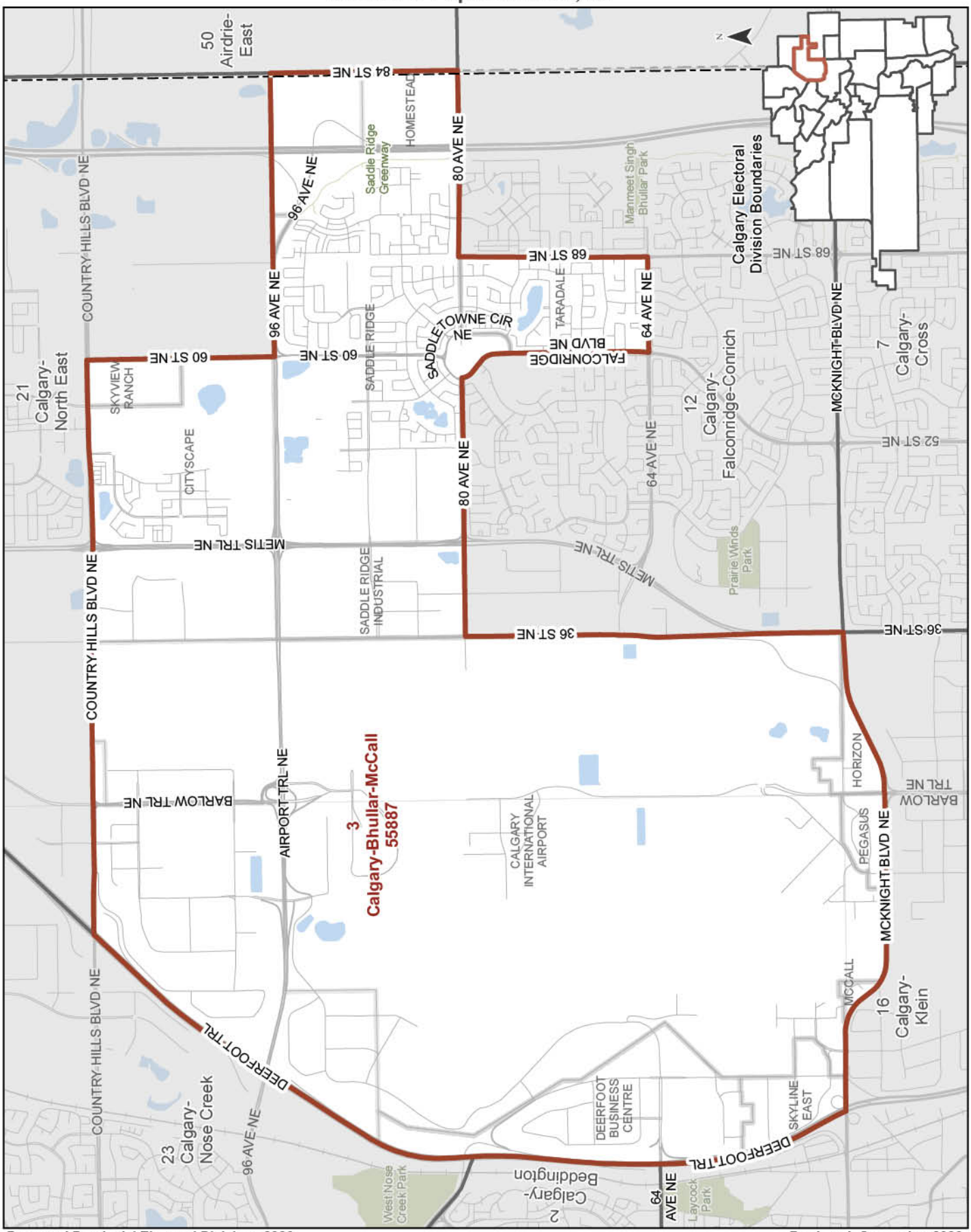


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Bhullar-McCall

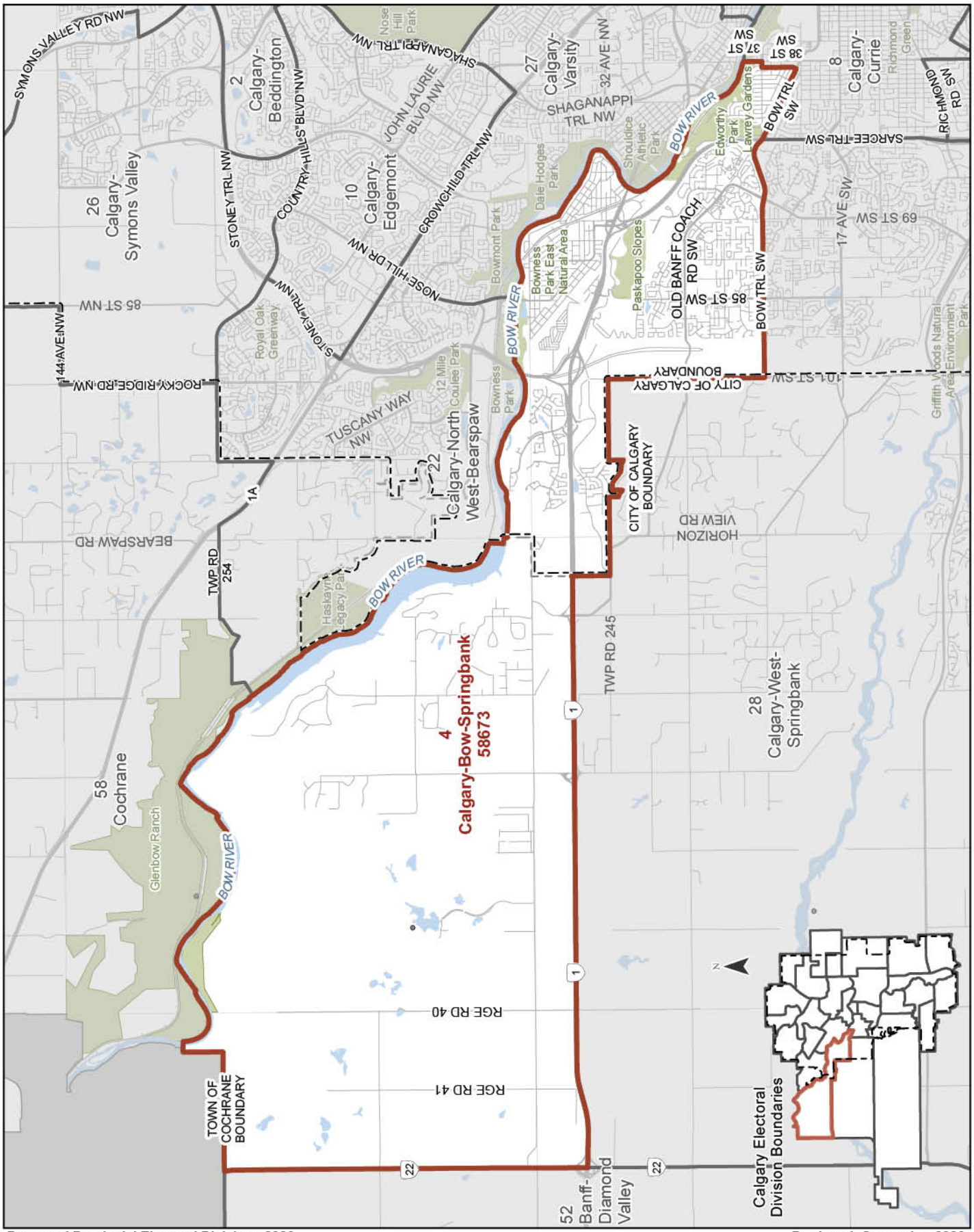
Estimated Population: 55,887



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

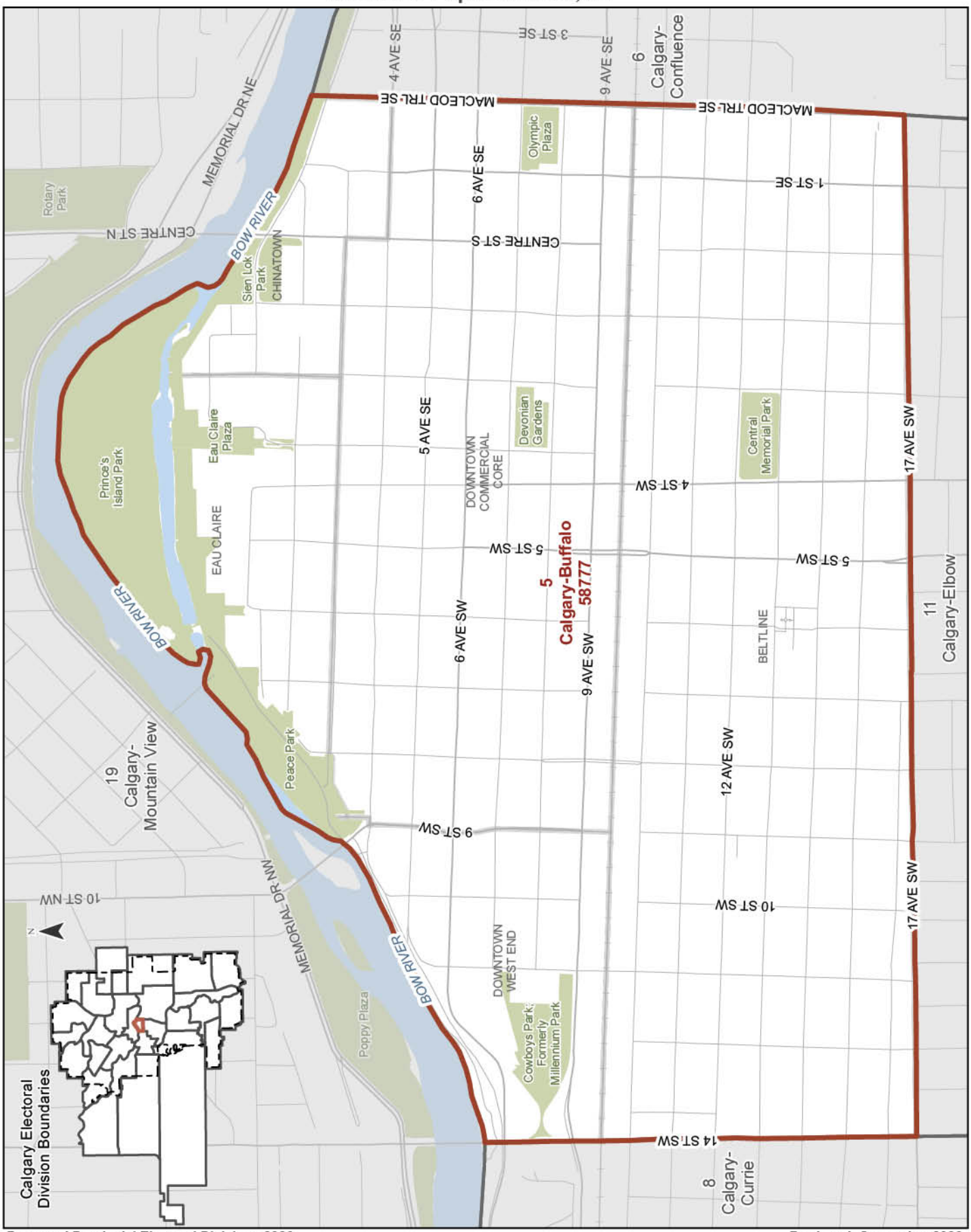
Calgary-Bow-Springbank
Estimated Population: 58,673



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Buffalo
Estimated Population: 58,777

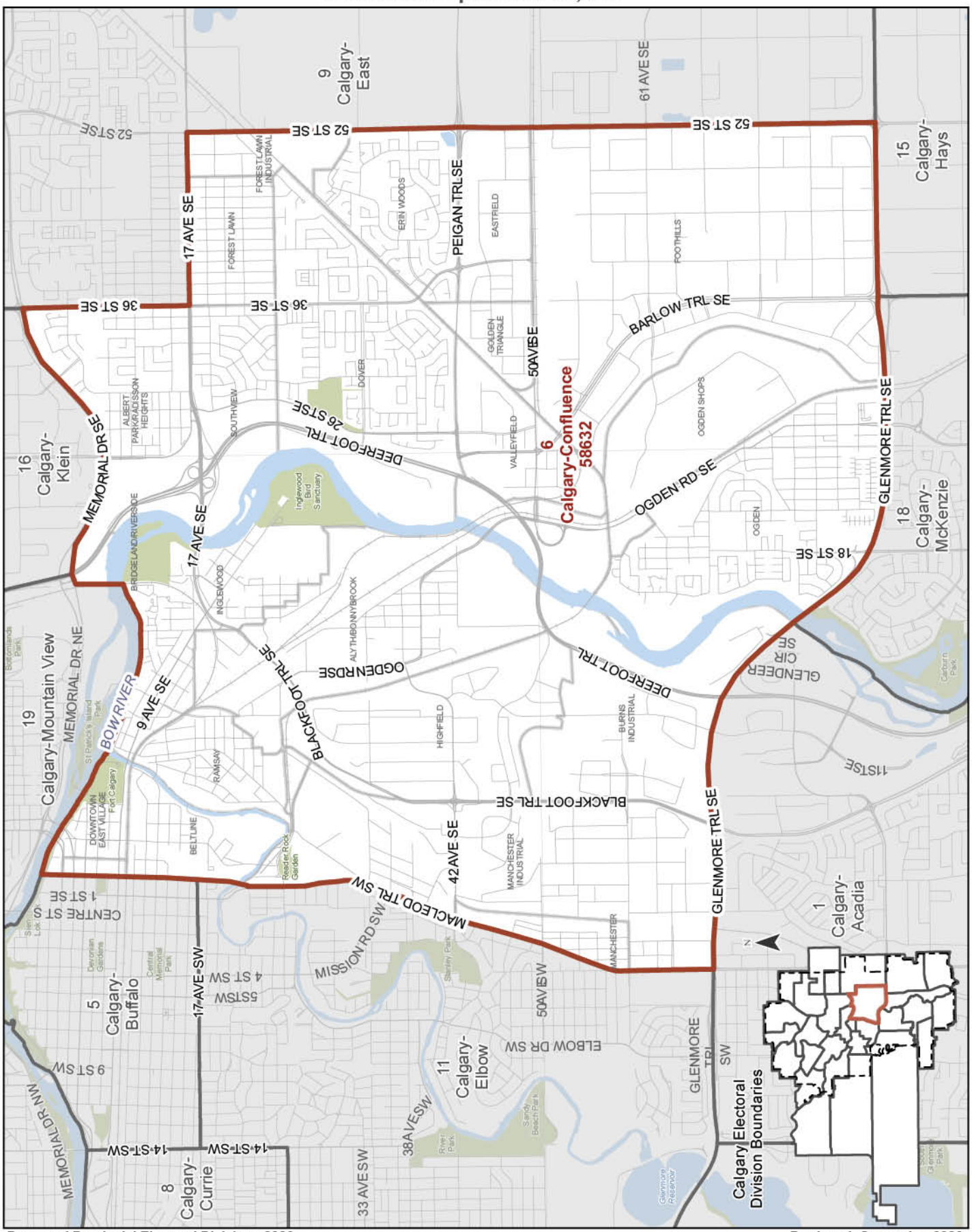


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Confluence

Estimated Population: 58,632

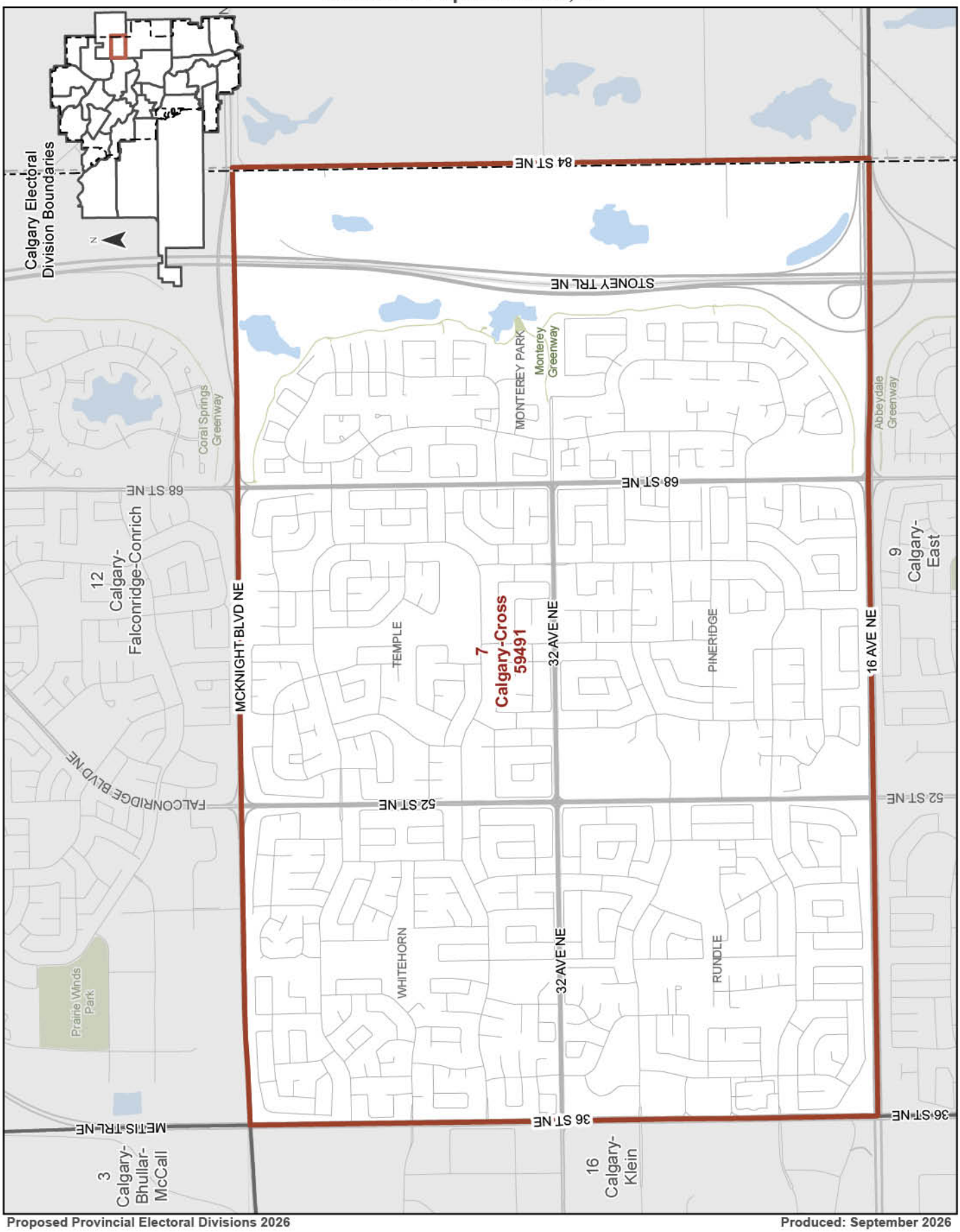


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Cross

Estimated Population: 59,491

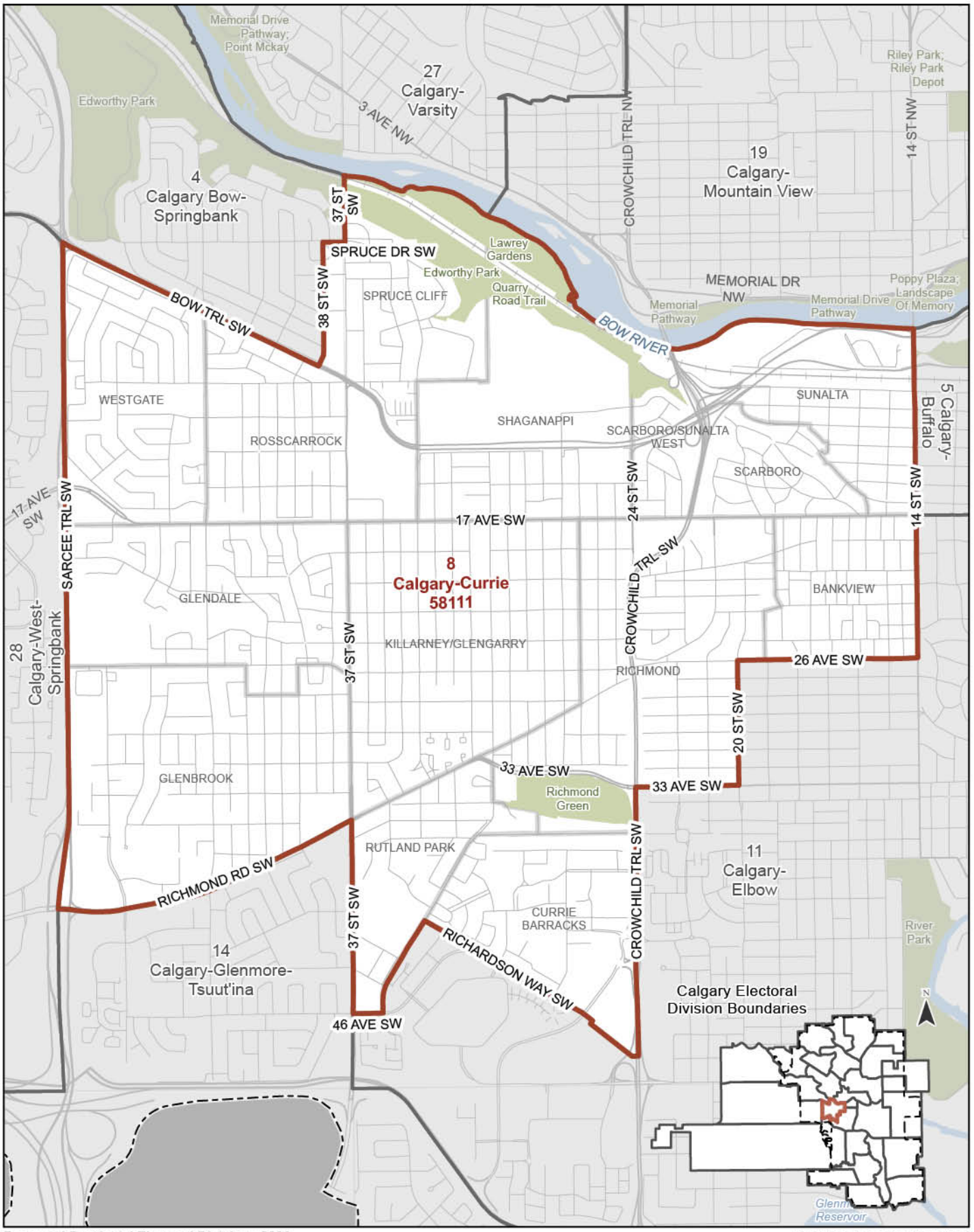


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Currie

Estimated Population: 58,111

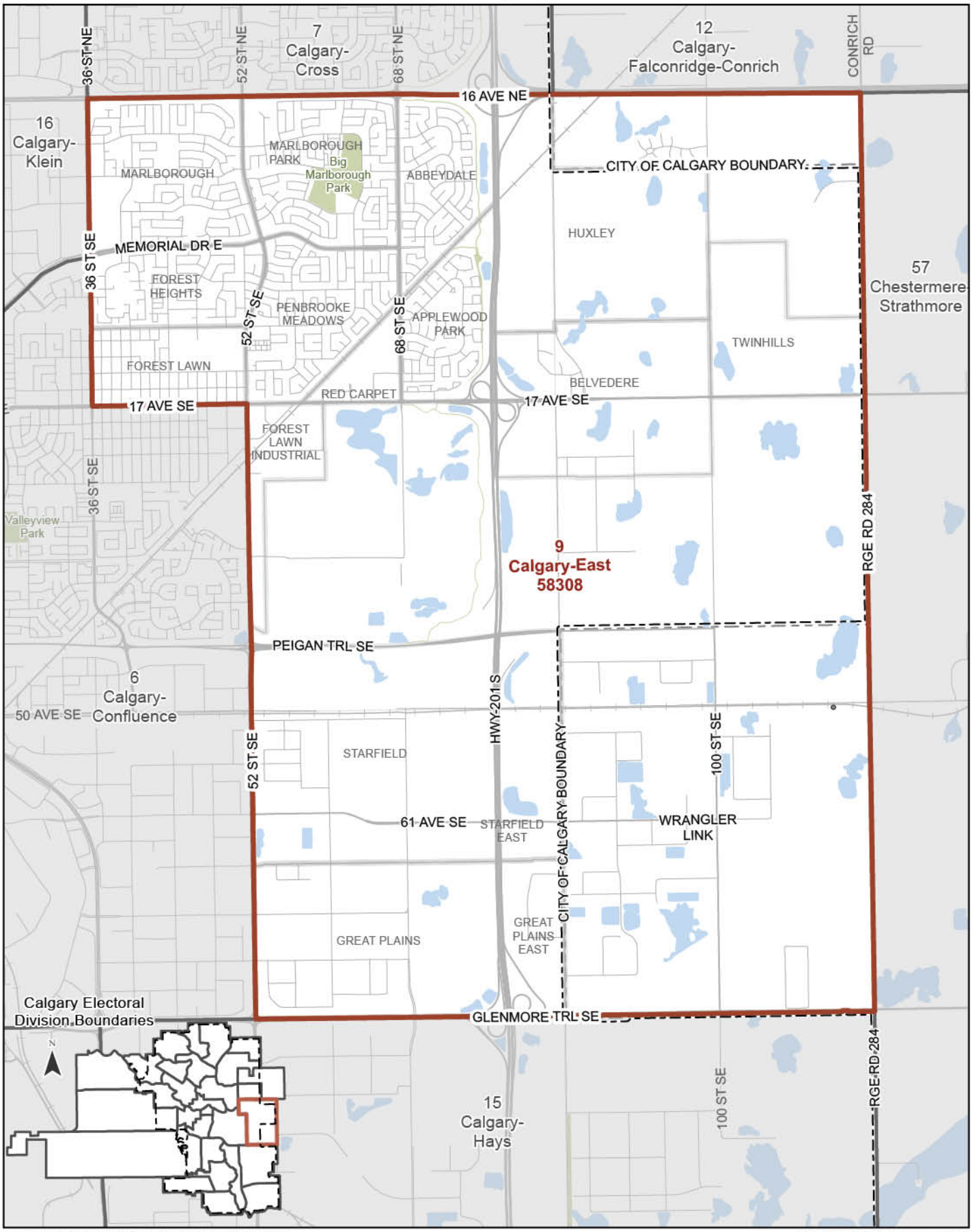


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-East

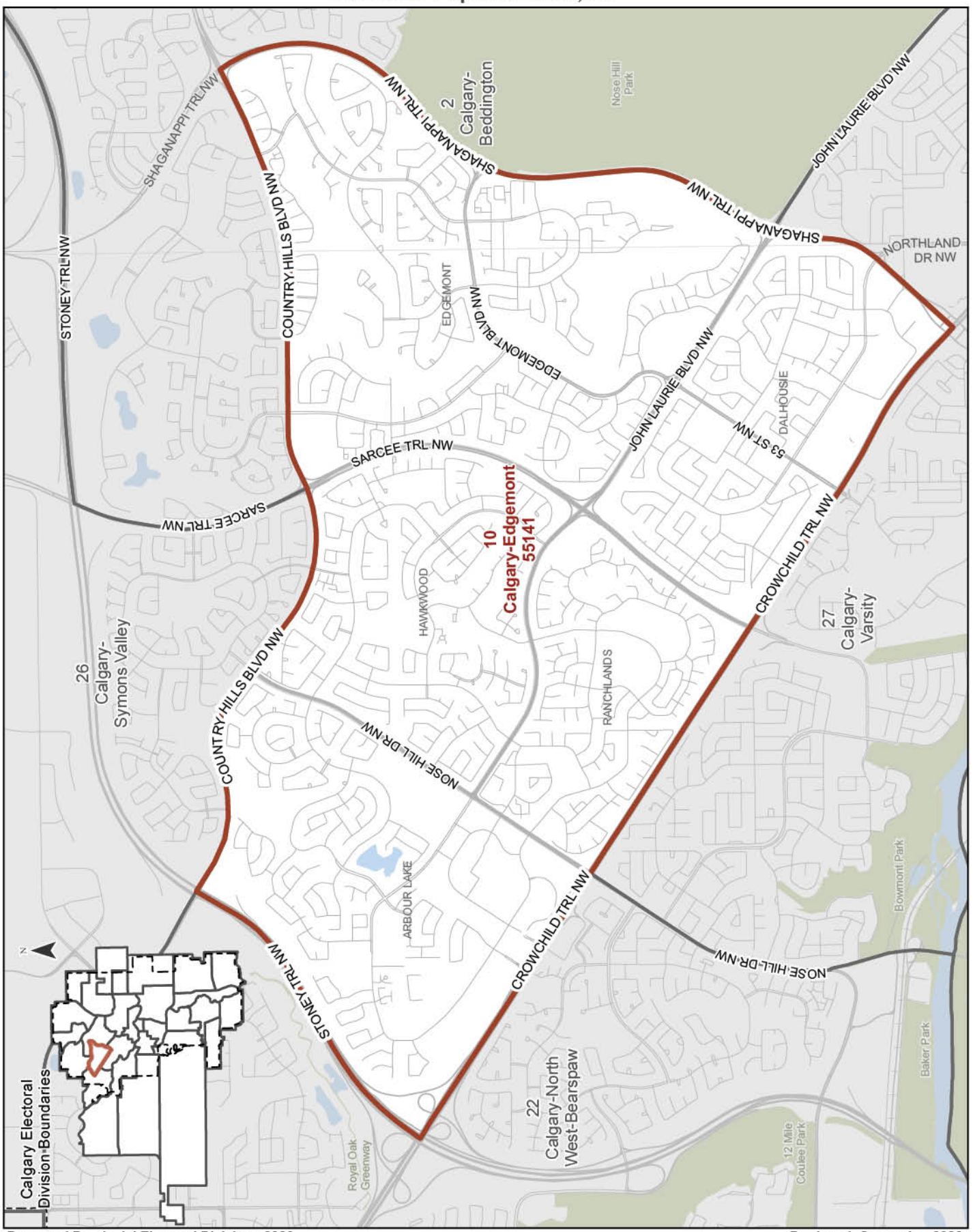
Estimated Population: 58,308



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Edgemont
Estimated Population: 55,141

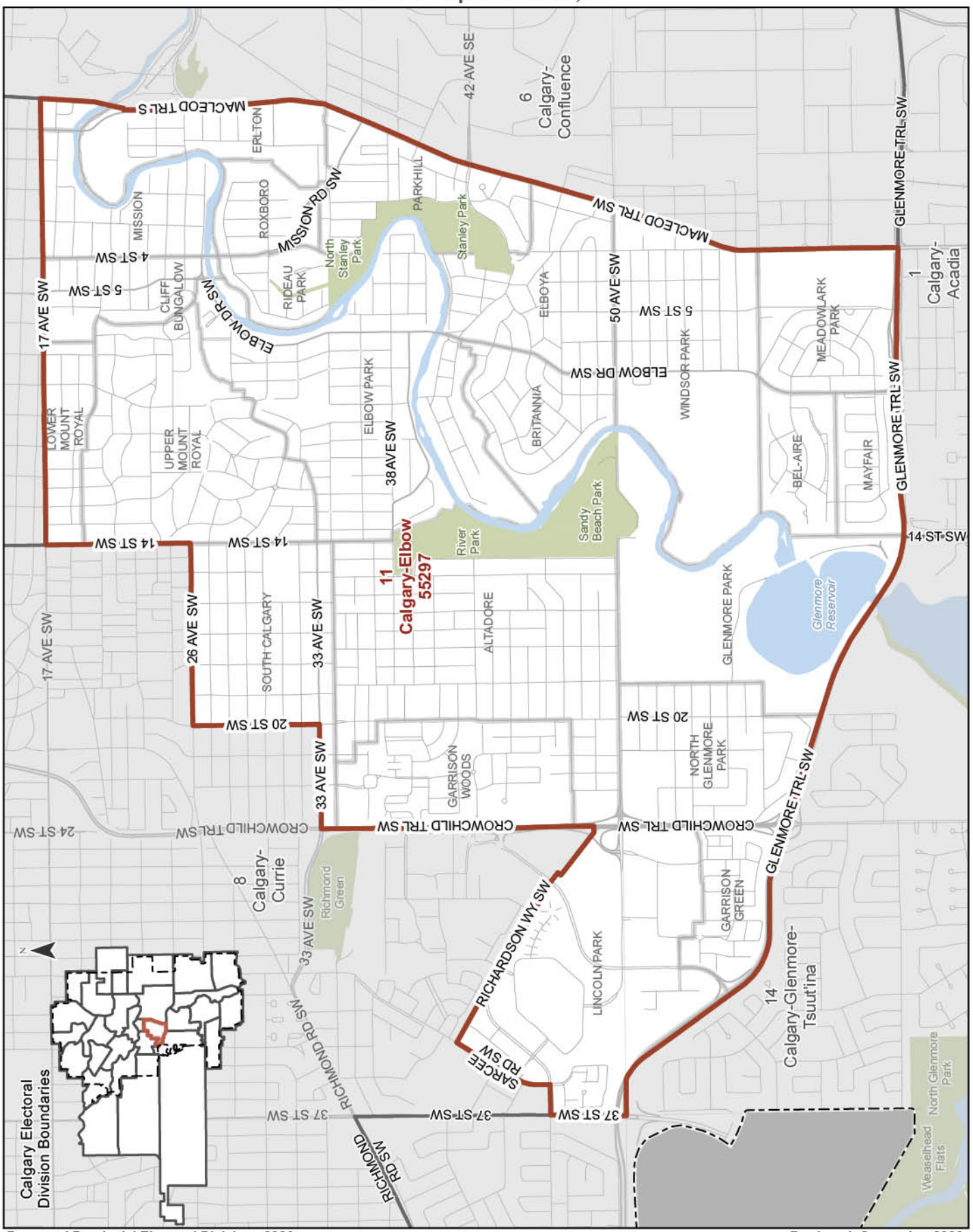


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Elbow

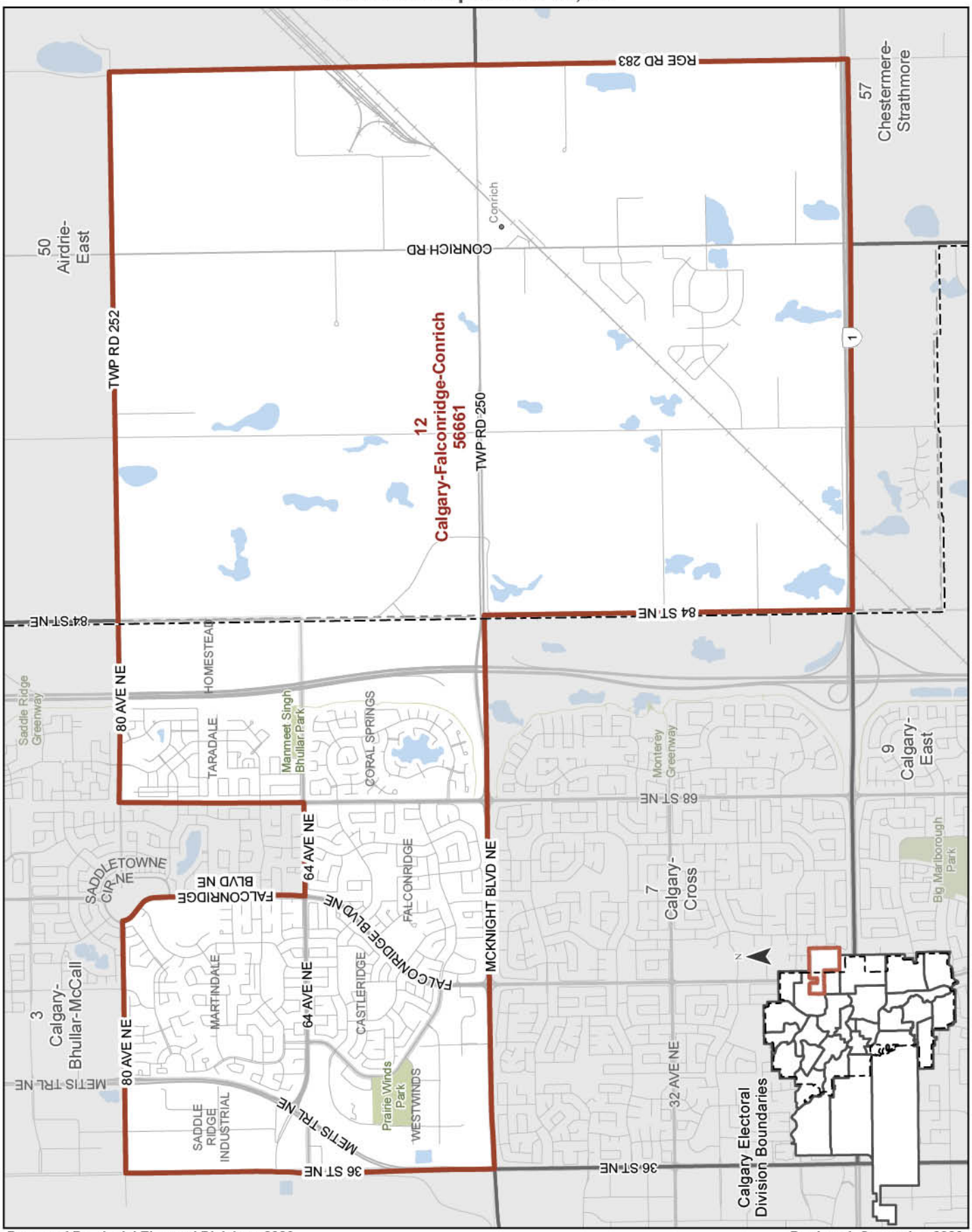
Estimated Population: 55,297



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Falconridge-Conrich
Estimated Population: 56,661

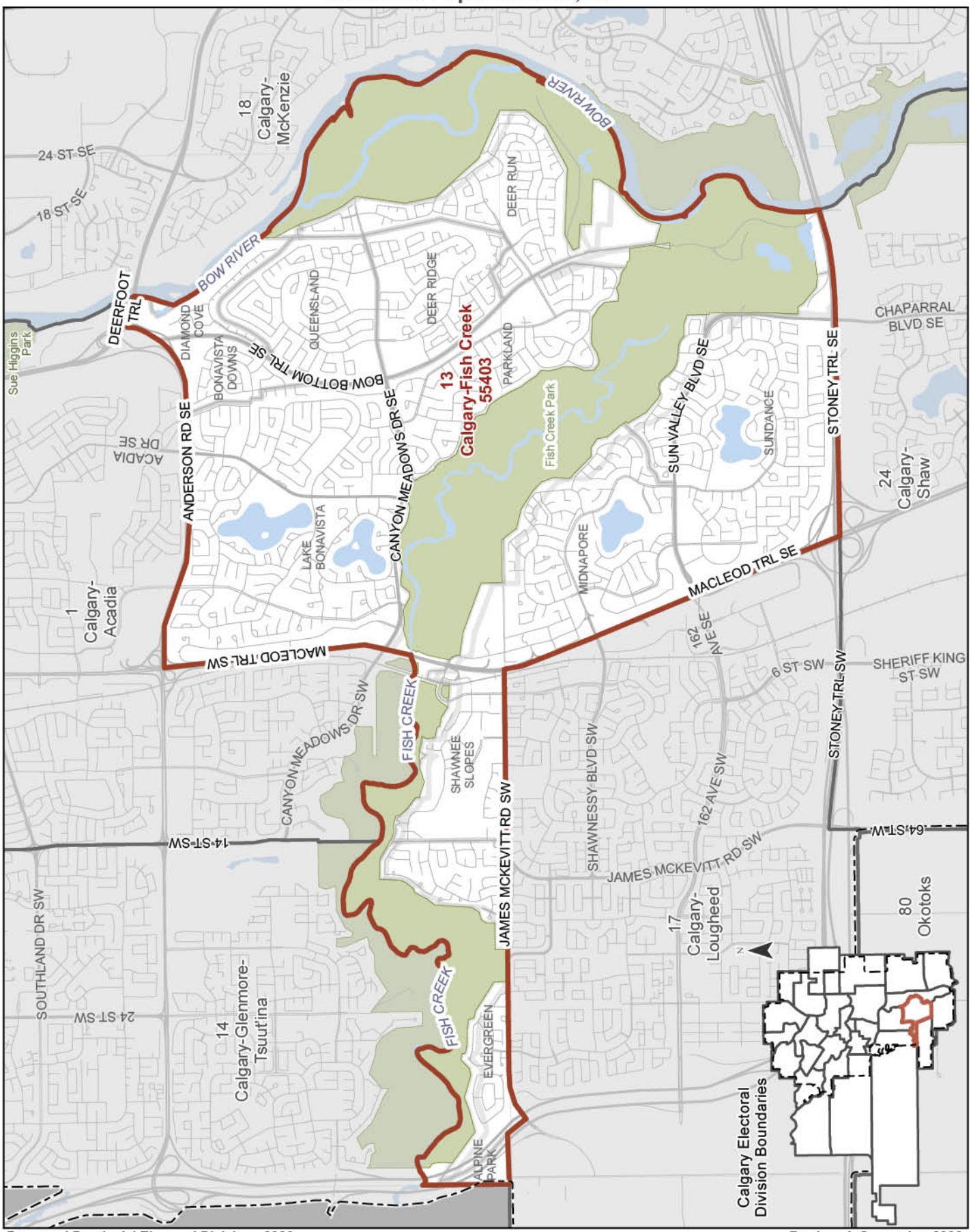


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Fish Creek

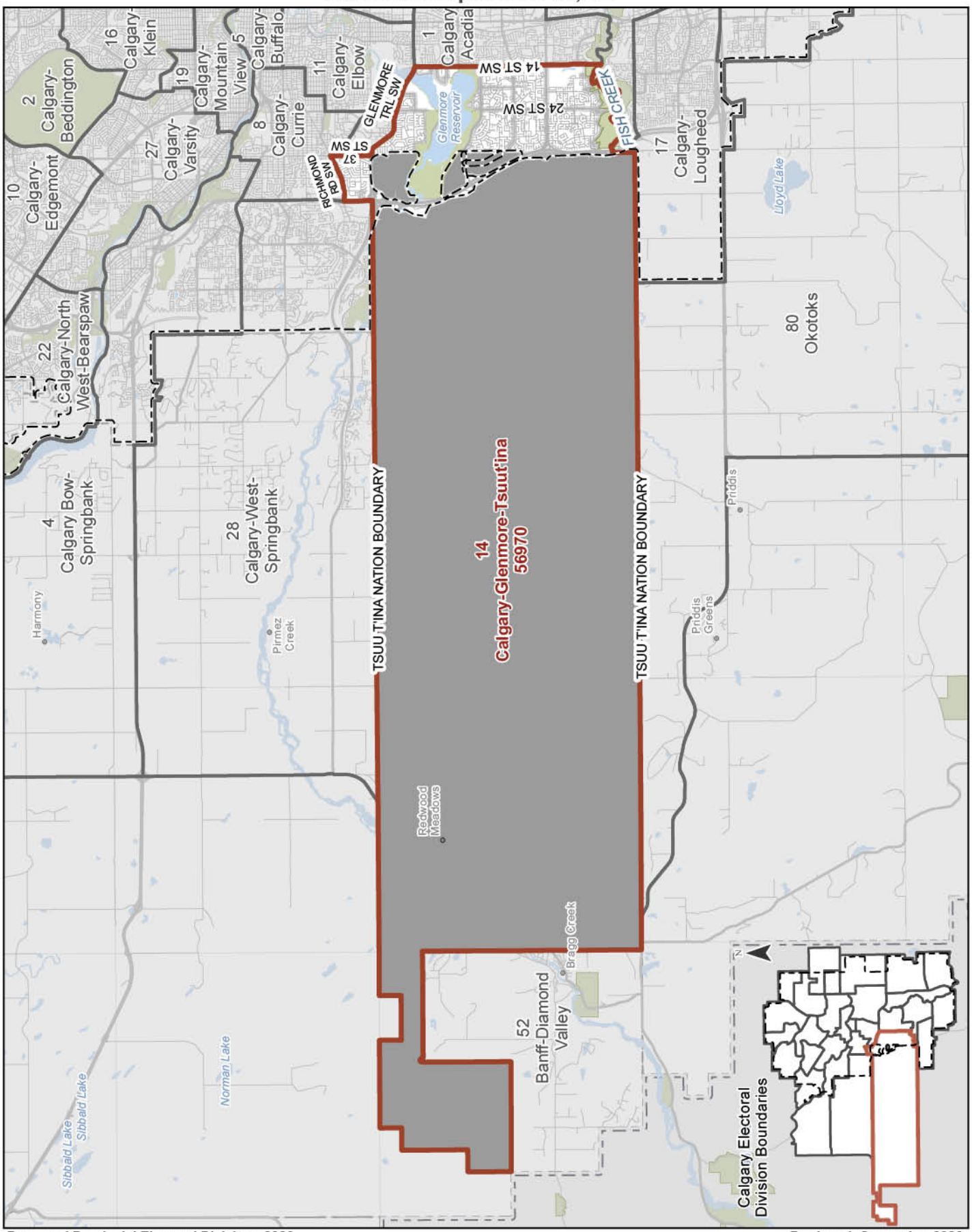
Estimated Population: 55,403



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

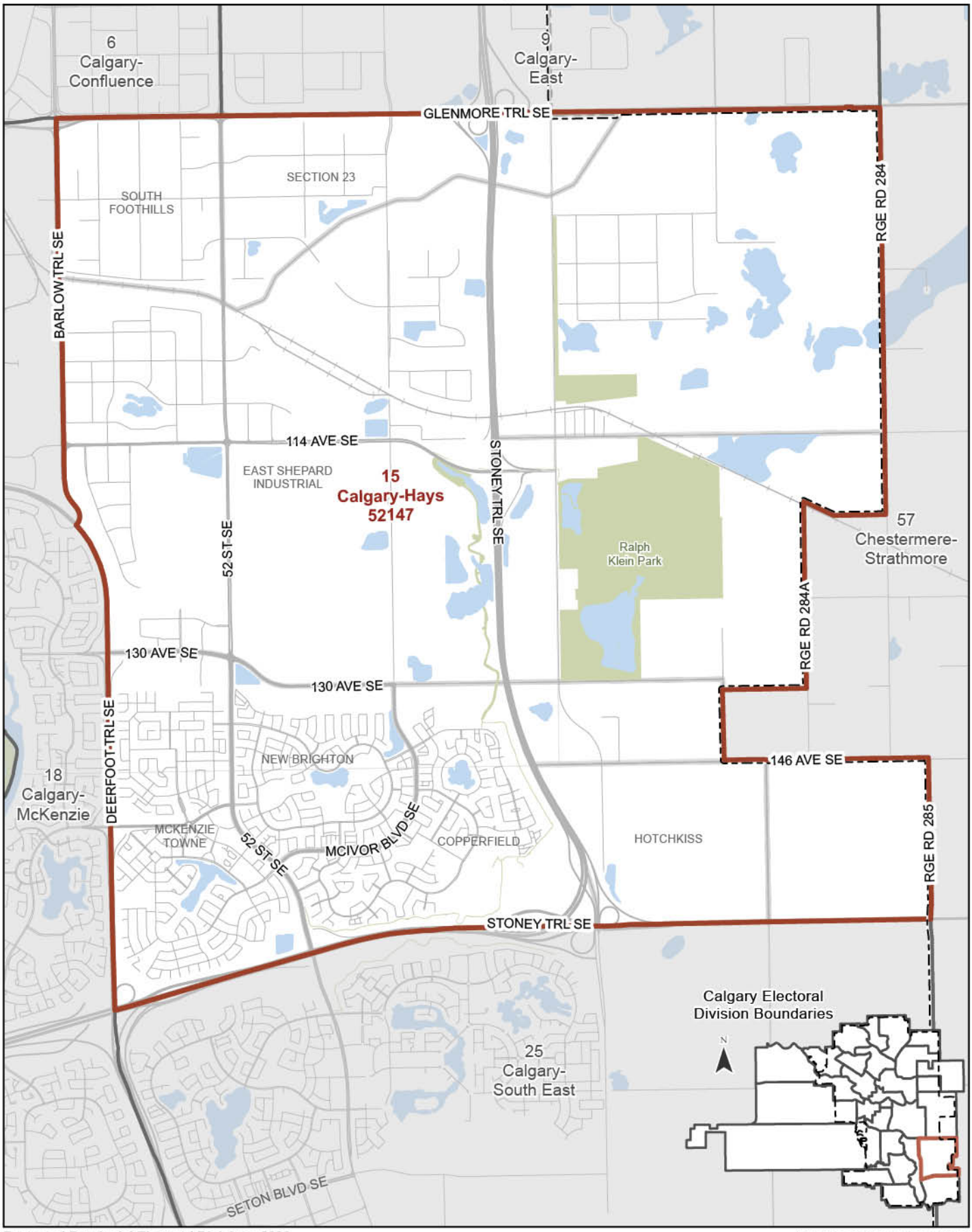
Calgary-Glenmore-Tsuut'ina
Estimated Population: 56,970



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

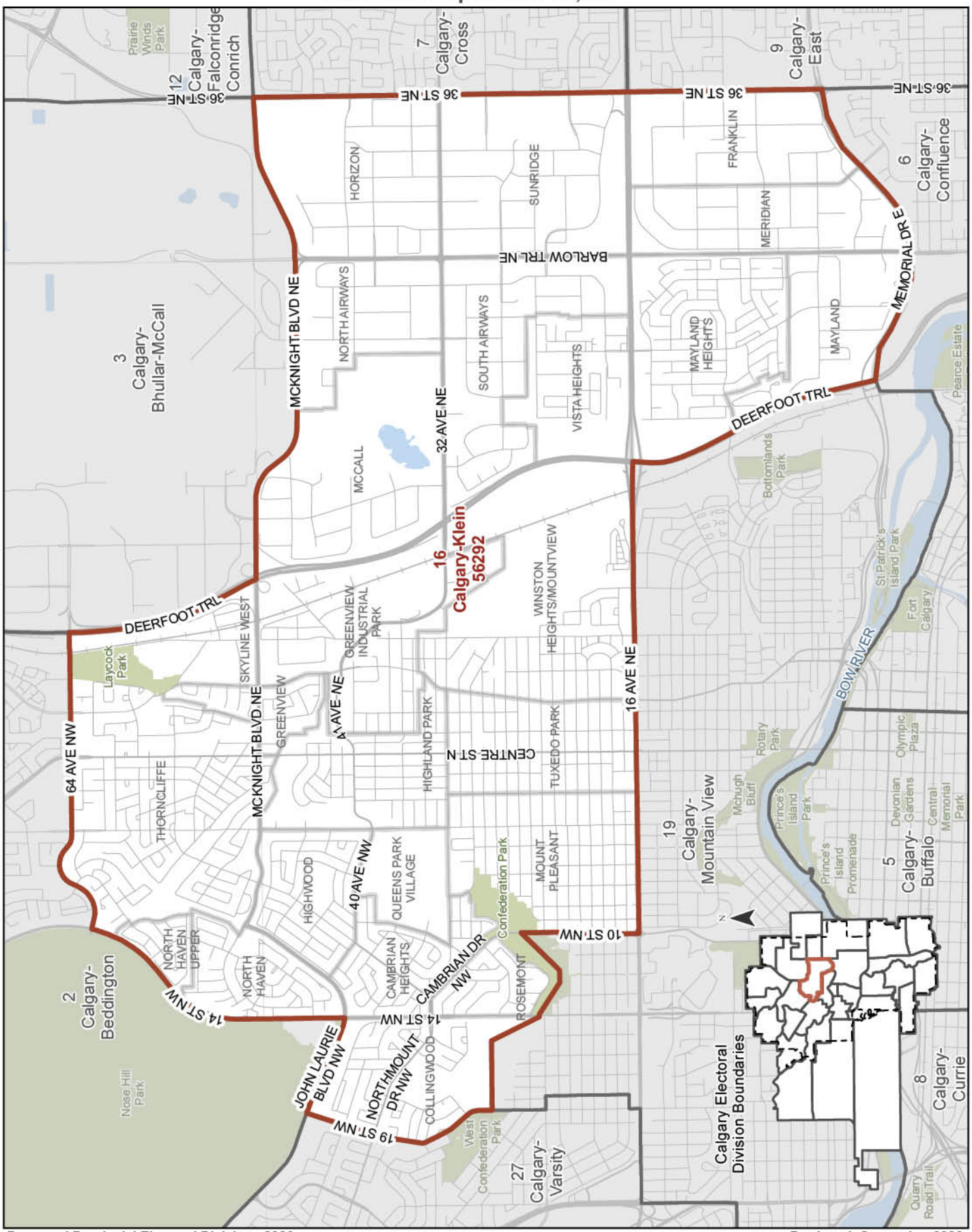
Calgary-Hays
Estimated Population: 52,147



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Klein
Estimated Population: 56,292

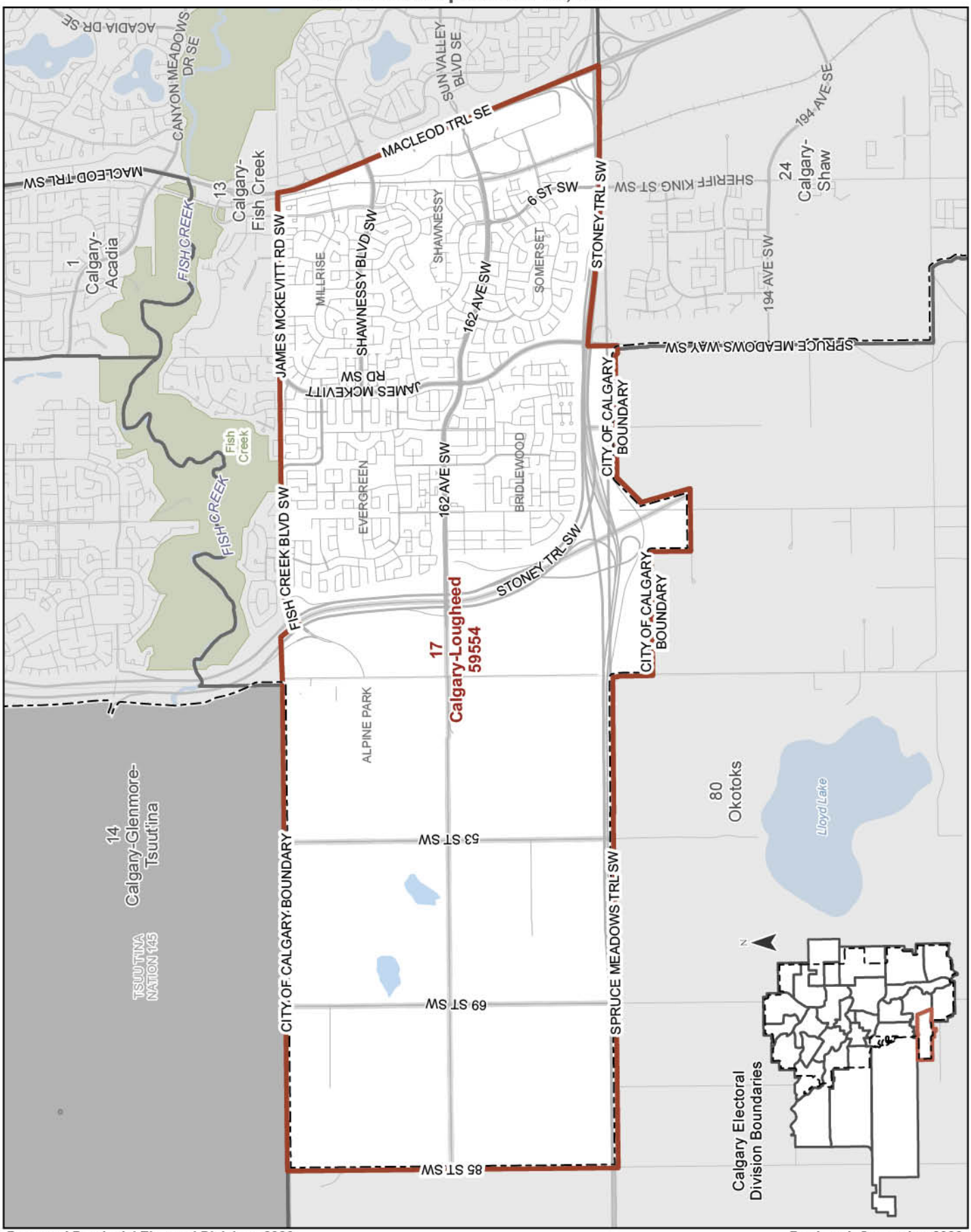


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Lougheed

Estimated Population: 59,554

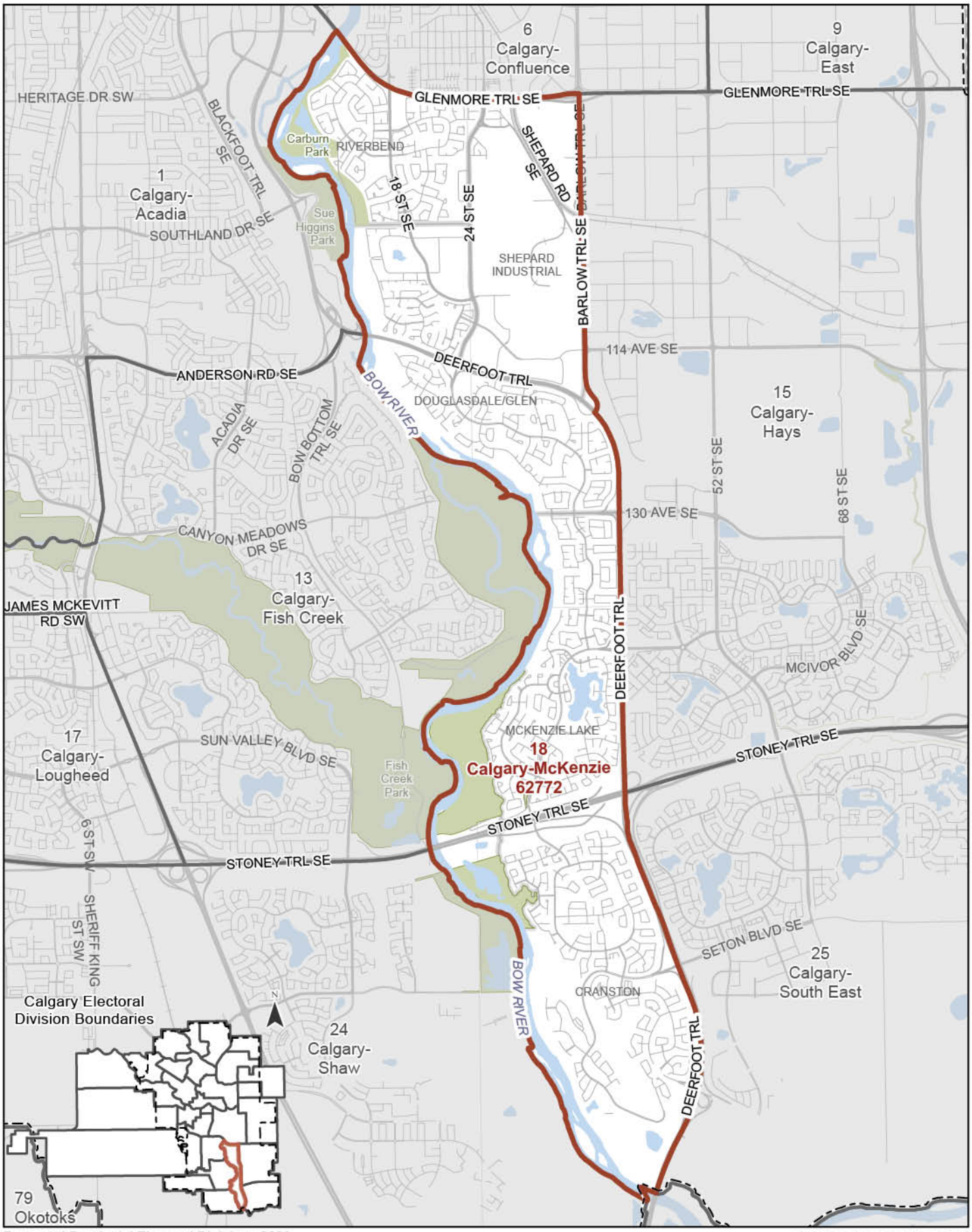


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-McKenzie

Estimated Population: 62,772

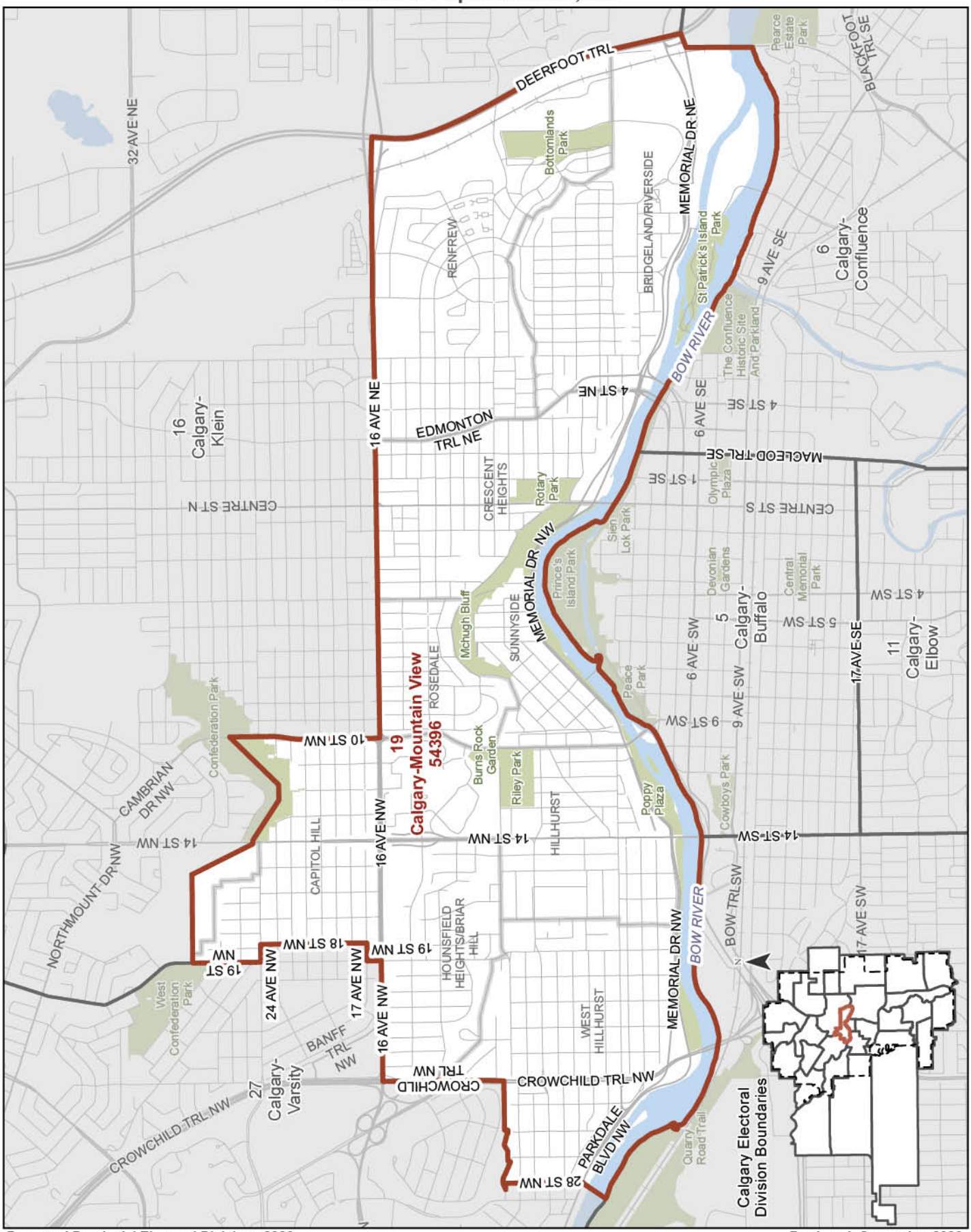


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Mountain View

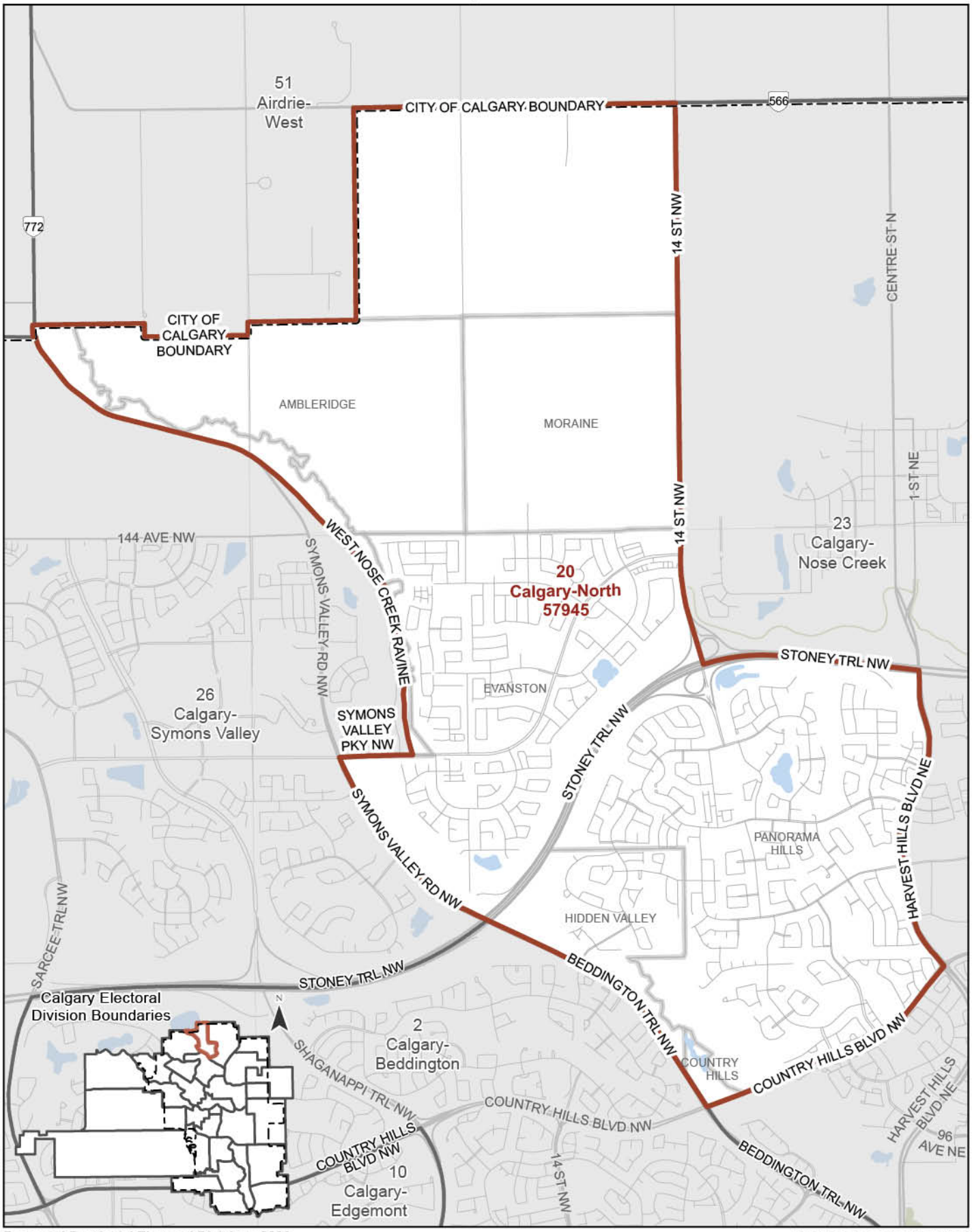
Estimated Population: 54,396



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

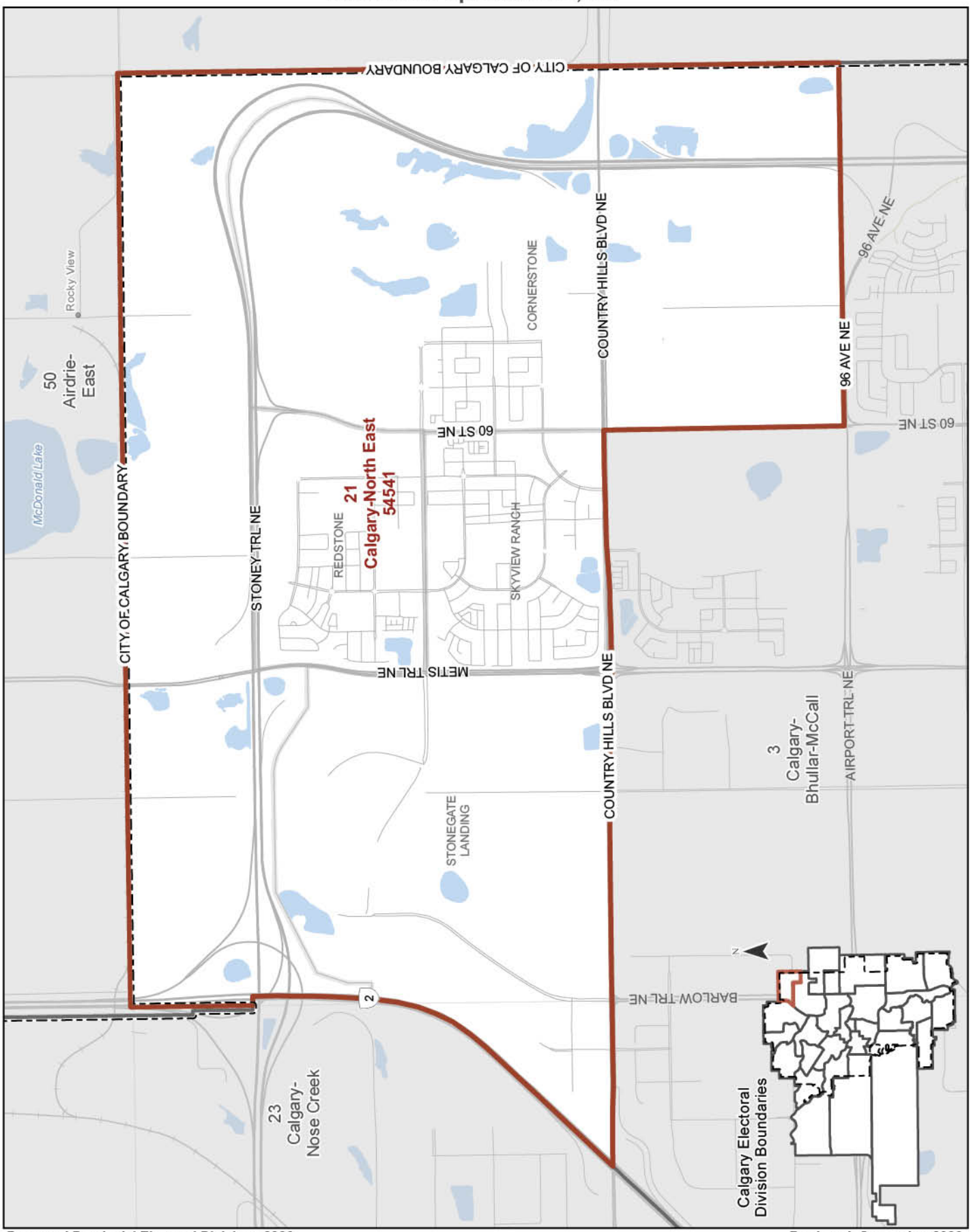
Calgary-North
Estimated Population: 57,945



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-North East
Estimated Population: 54,541

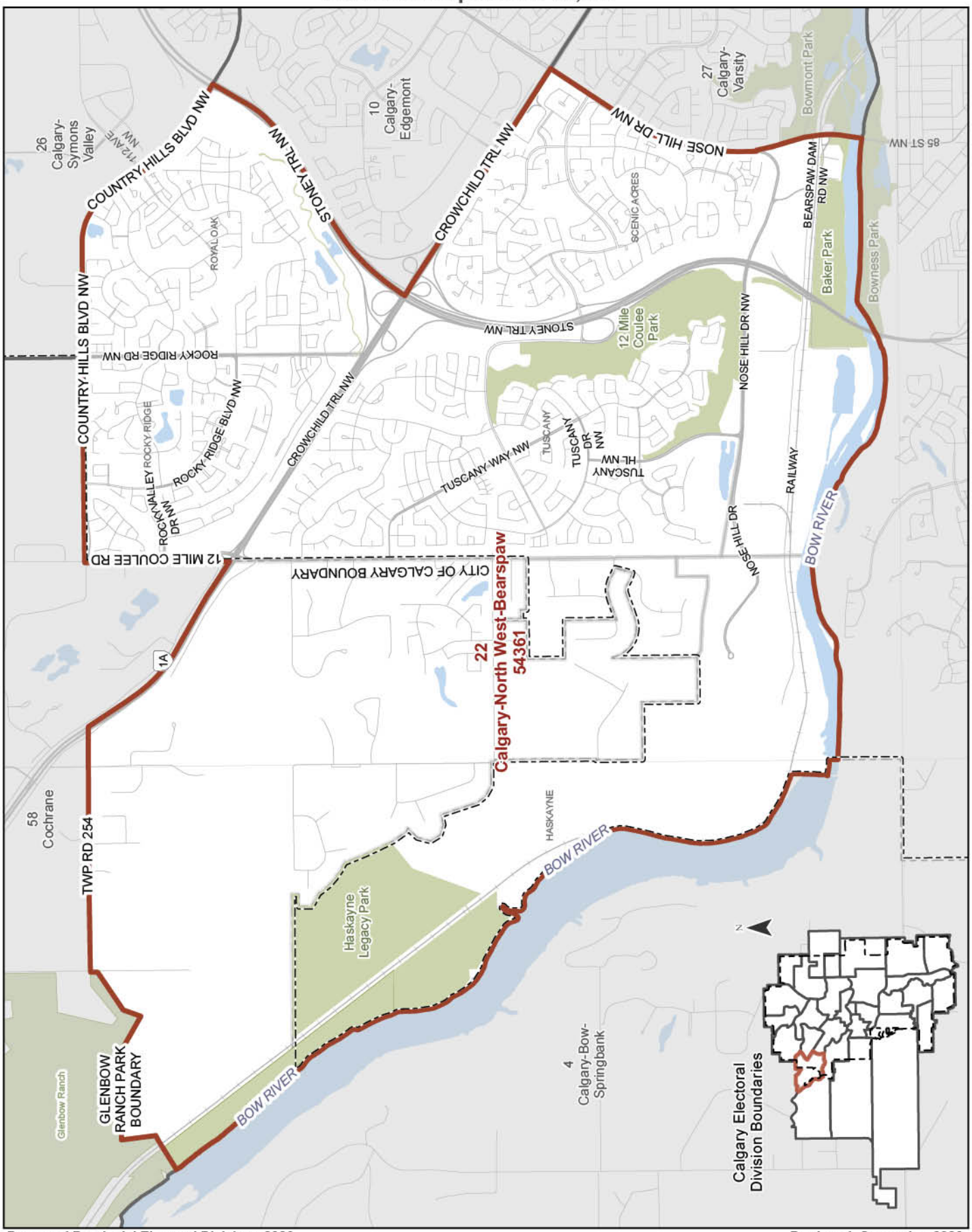


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-North West-Bearspaw

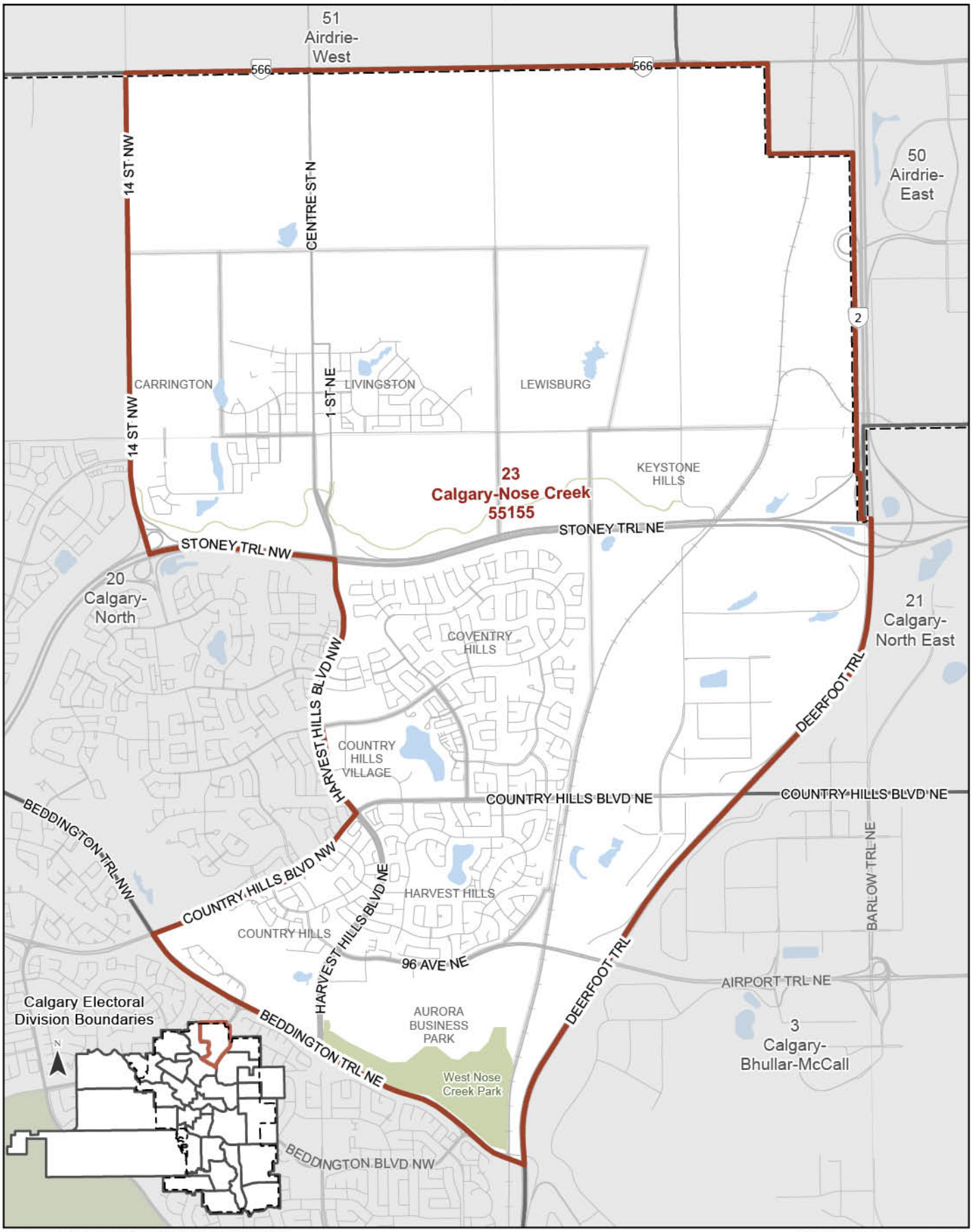
Estimated Population: 54,361



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Nose Creek
Estimated Population: 55,155

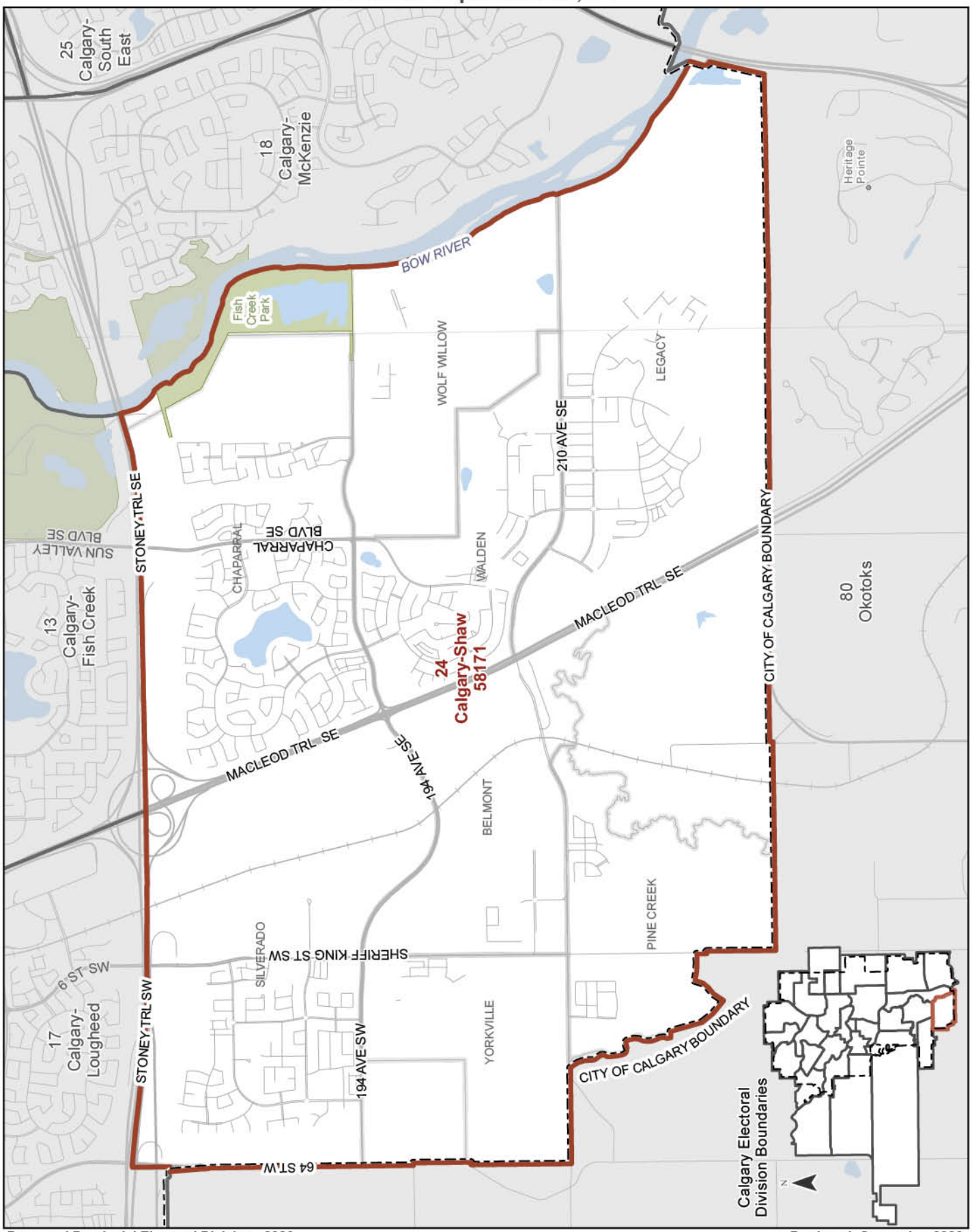


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Shaw

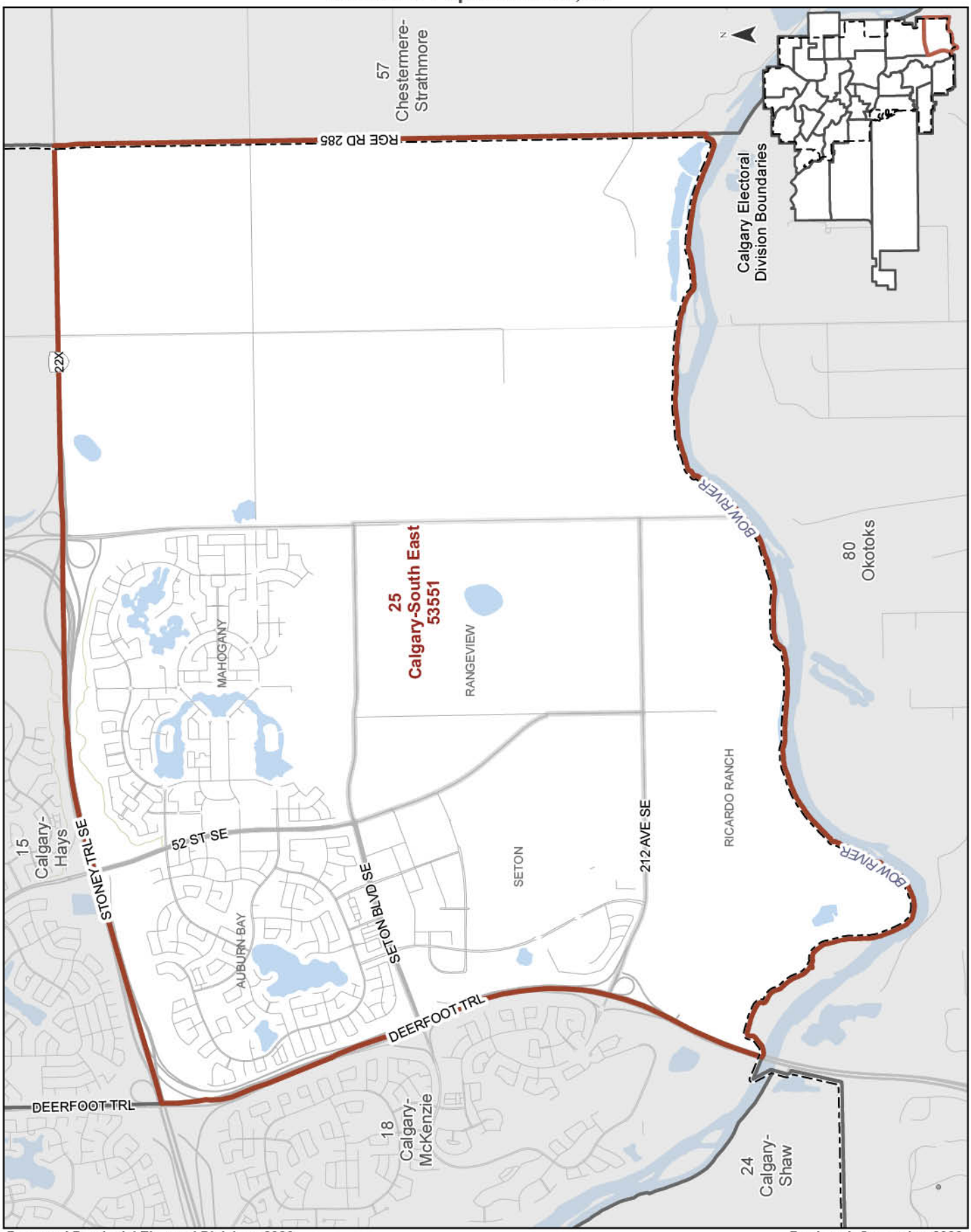
Estimated Population: 58,171



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-South East
Estimated Population: 53,551

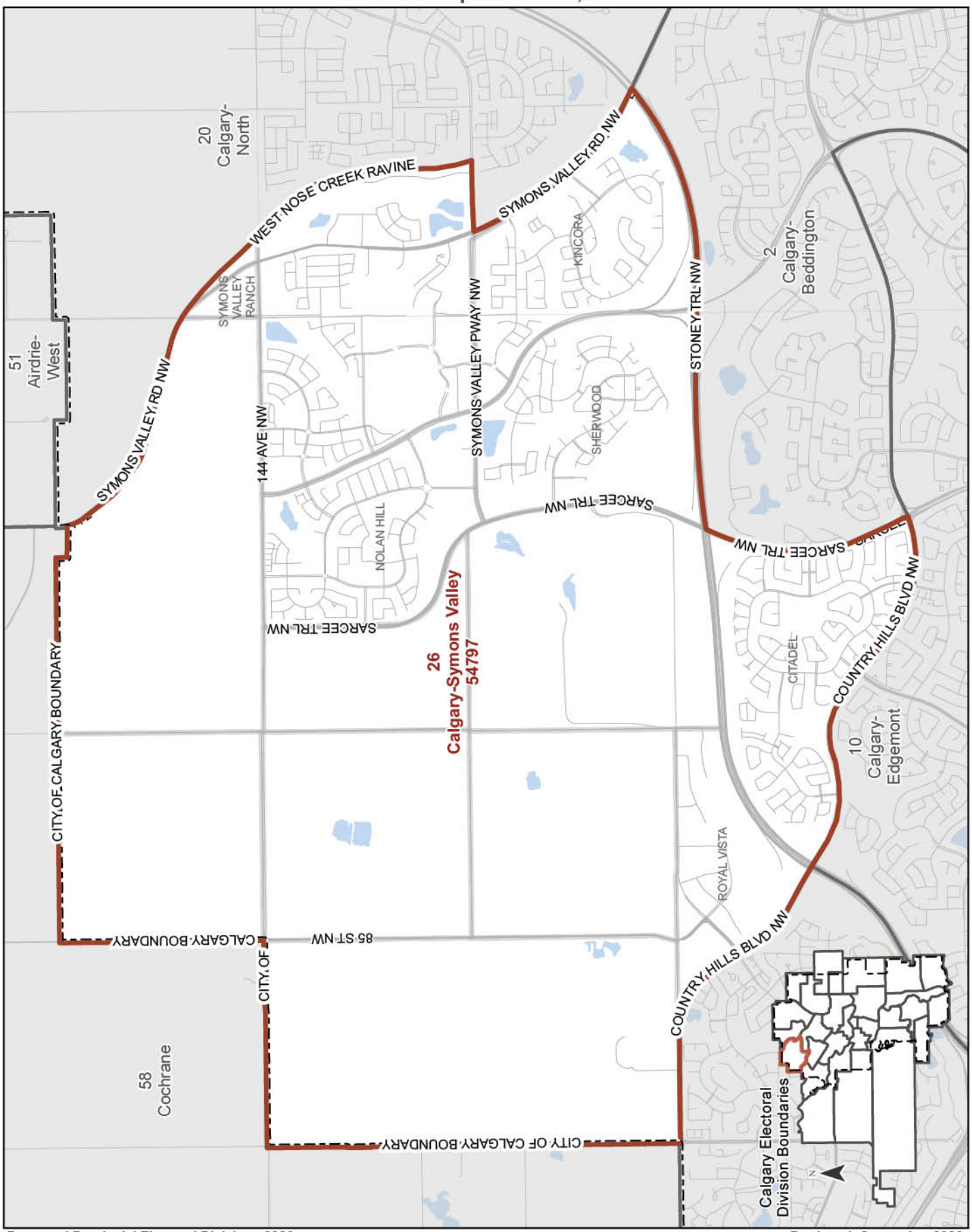


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Calgary-Symons Valley

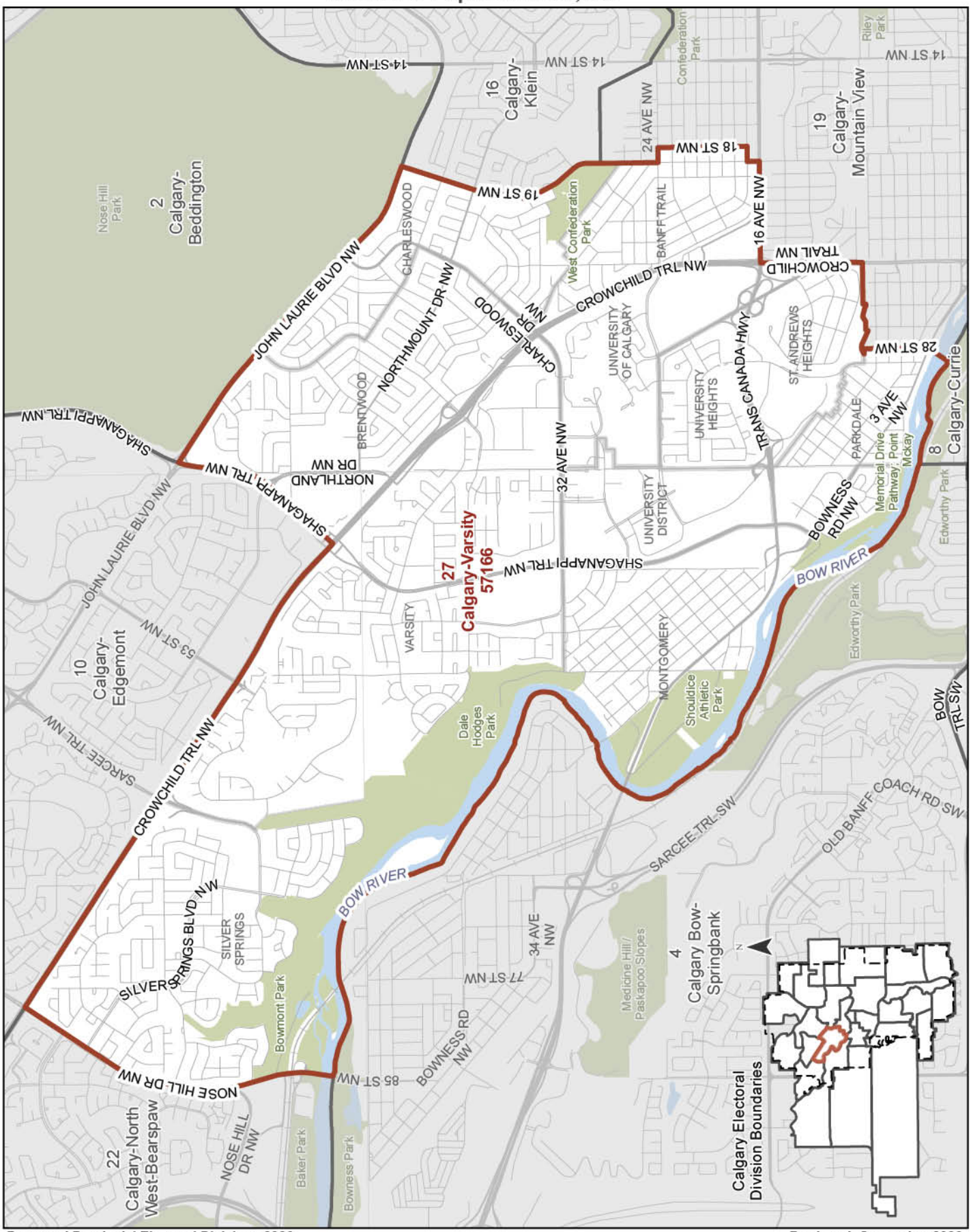
Estimated Population: 54,797



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

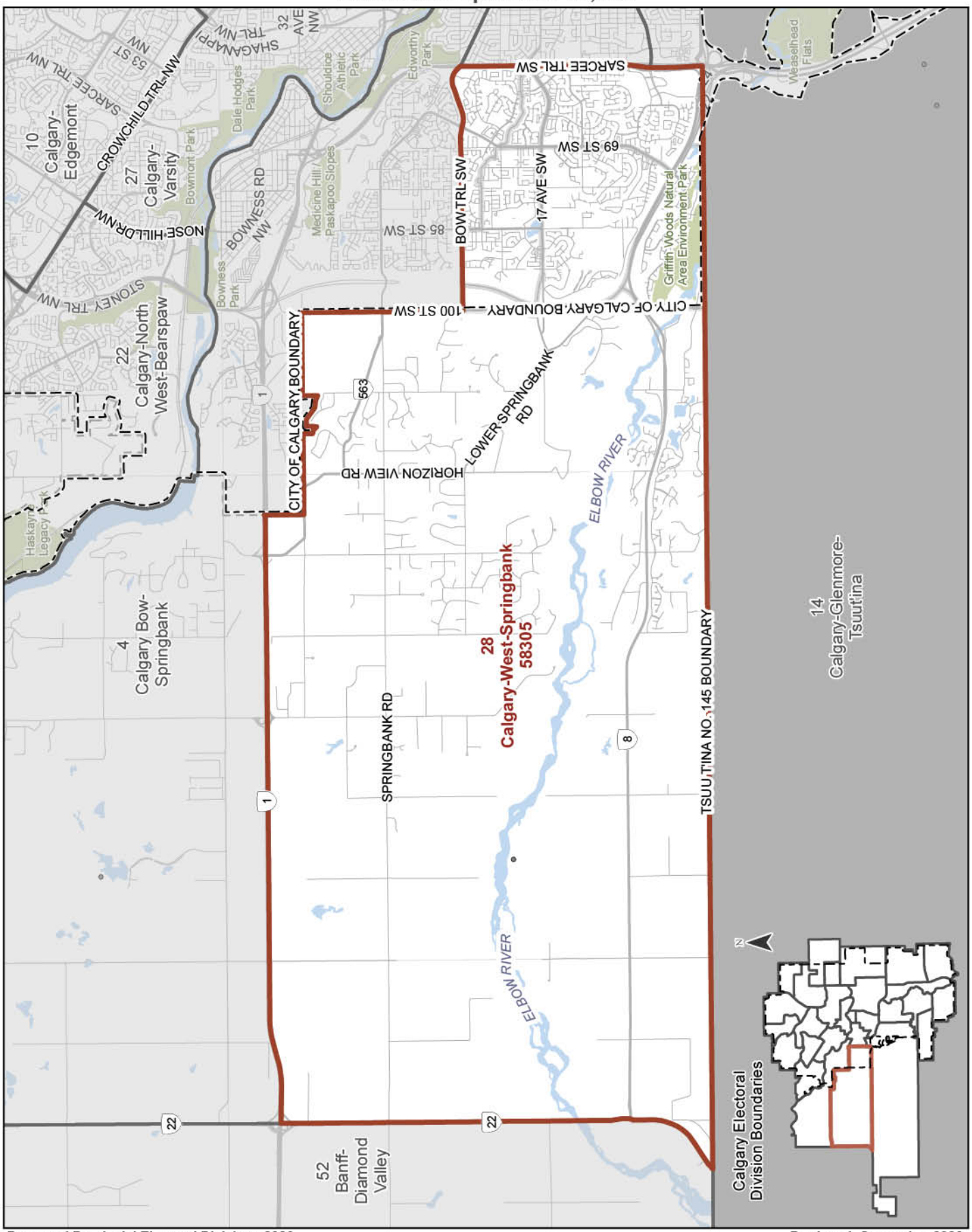
Calgary-Varsity
Estimated Population: 57,166



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

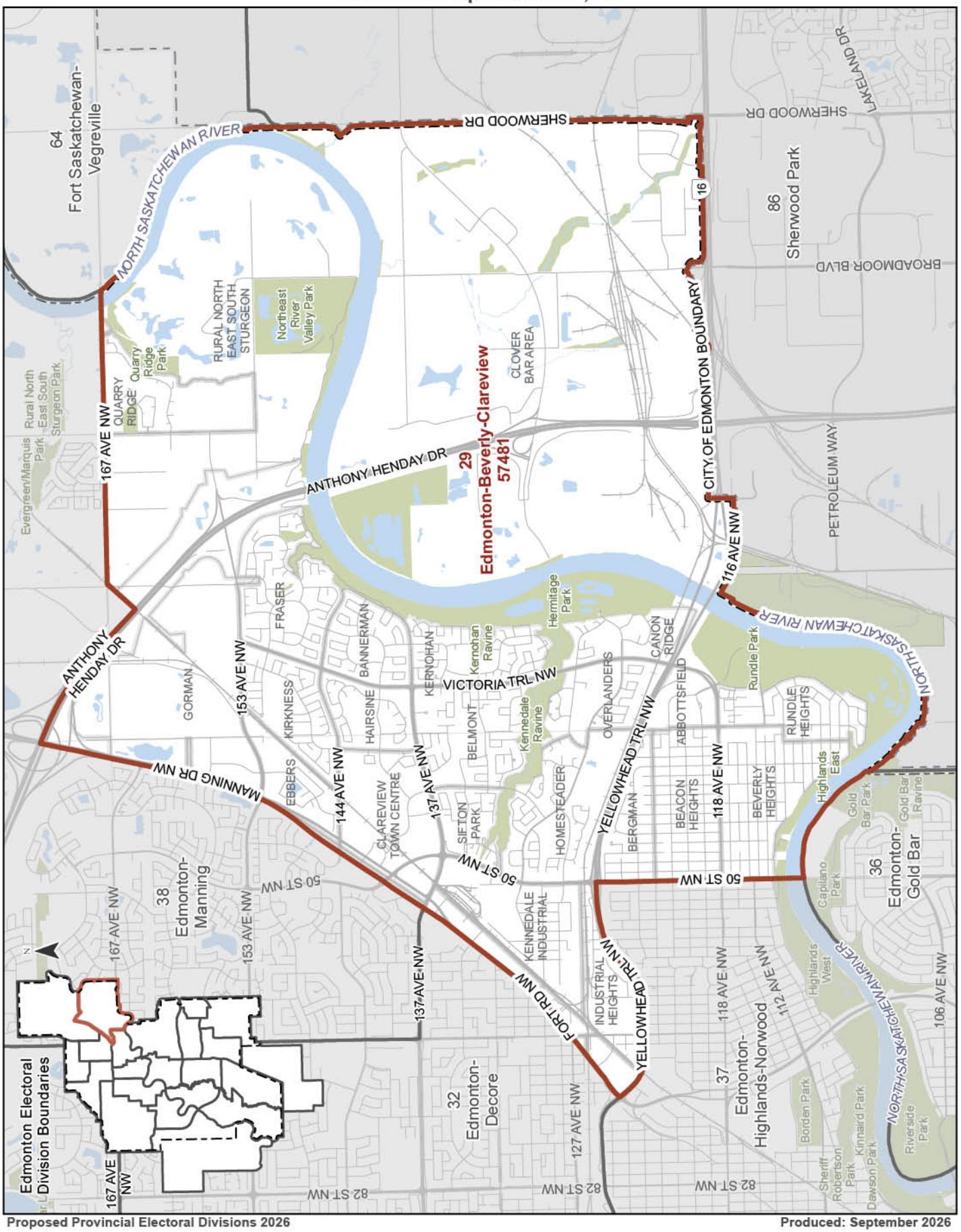
Calgary-West-Springbank
Estimated Population: 58,305



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Beverly-Clareview
Estimated Population: 57,481

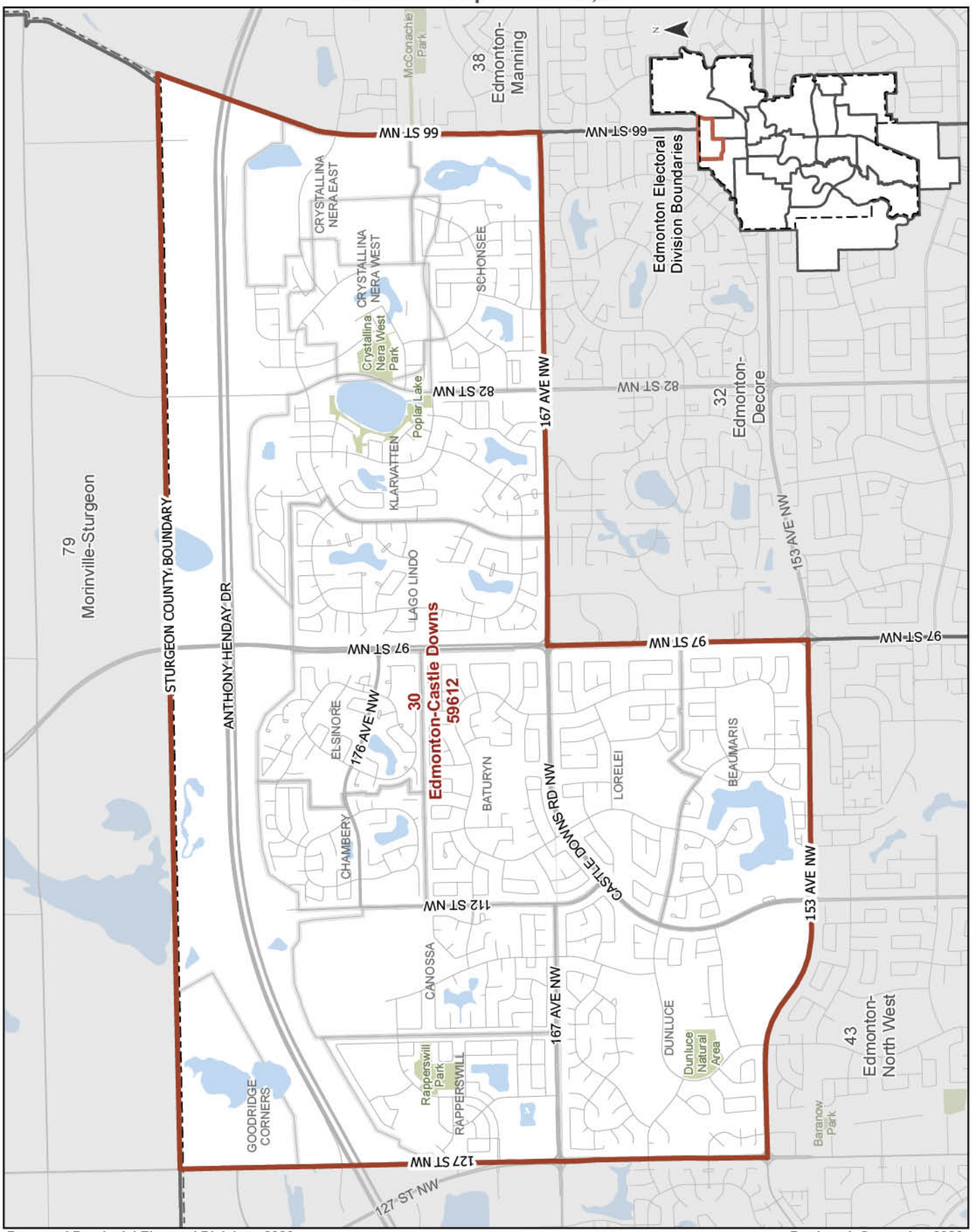


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Castle Downs

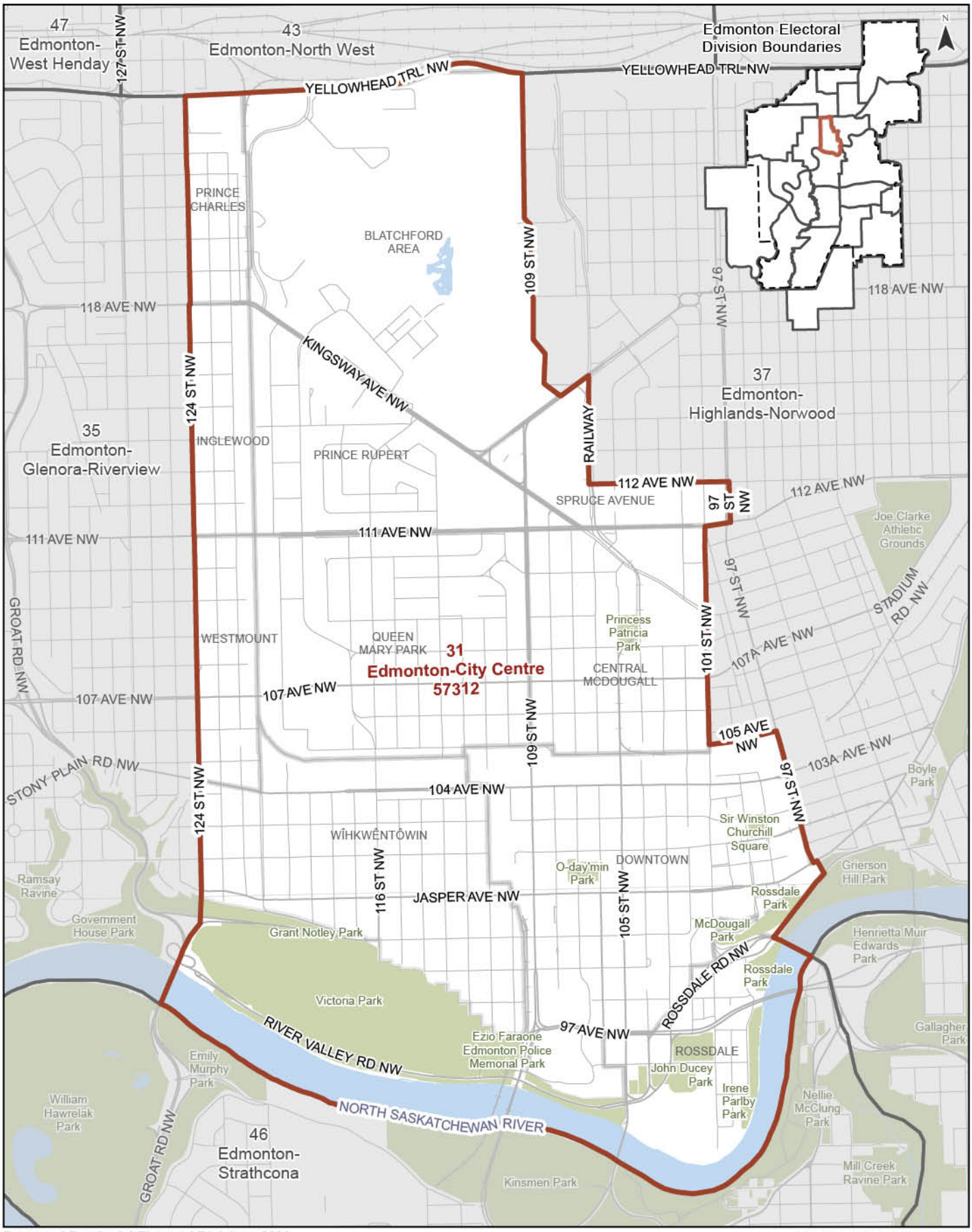
Estimated Population: 59,612



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-City Centre
Estimated Population: 57,312

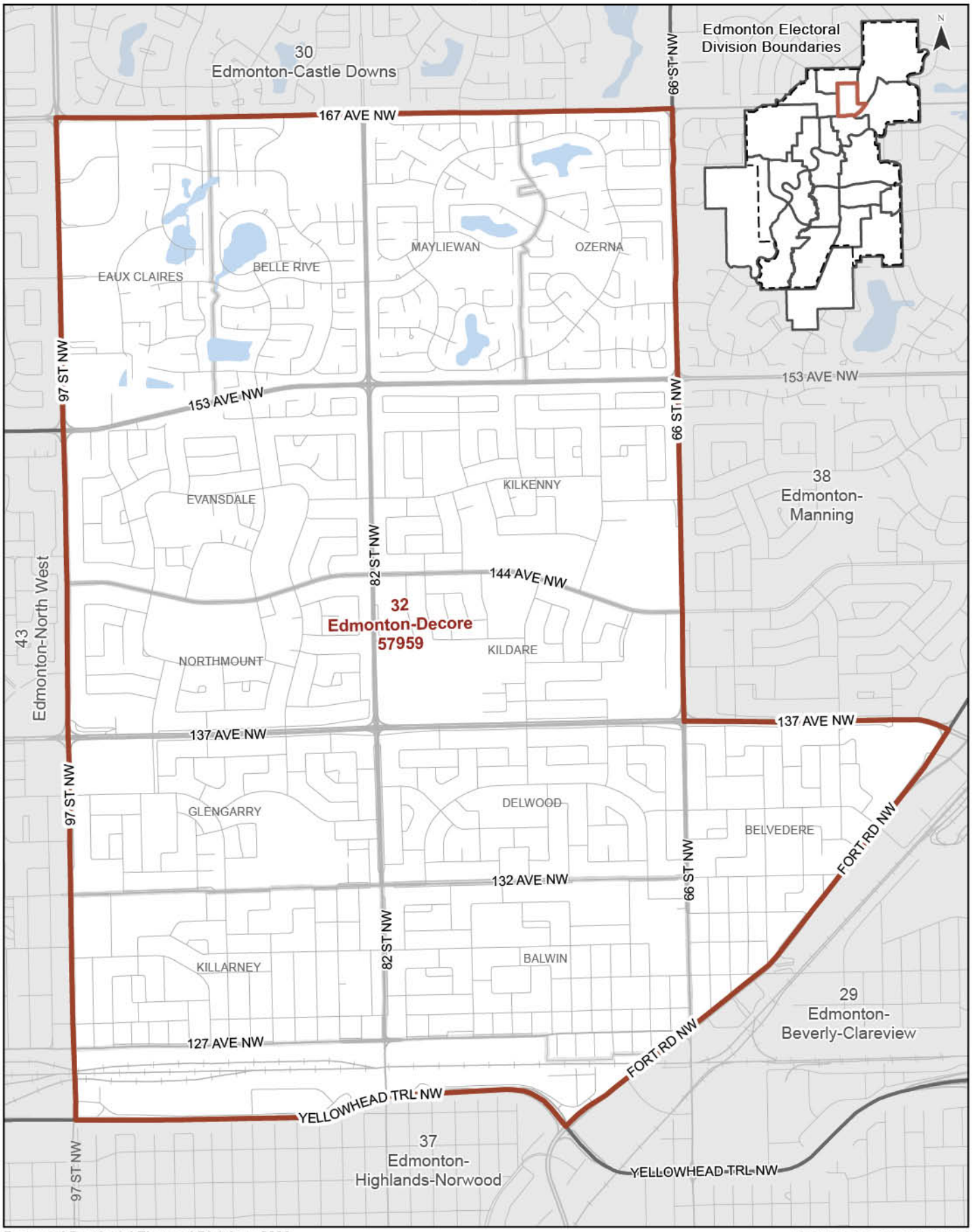


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Decore

Estimated Population: 57,959

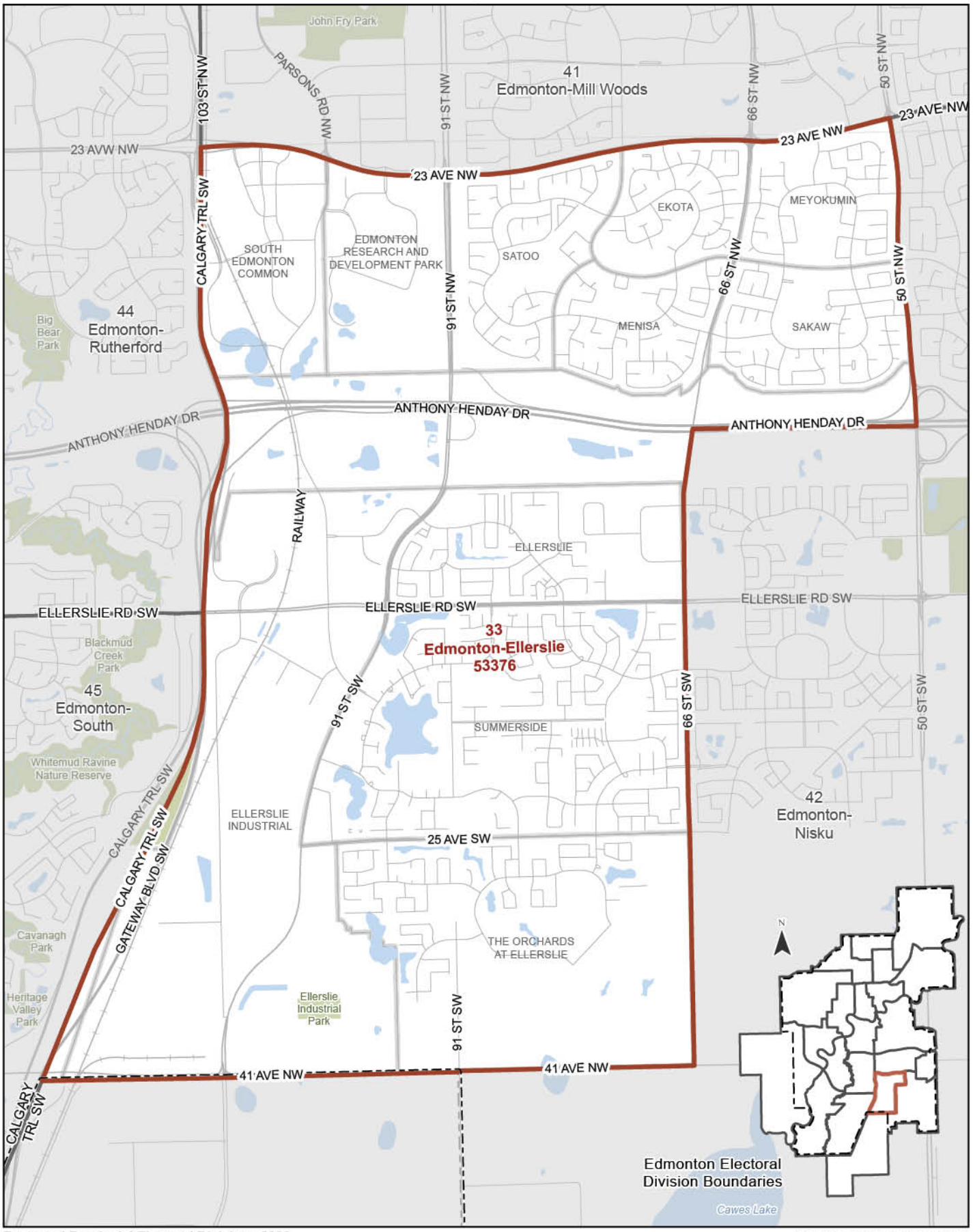


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Ellerslie

Estimated Population: 53,376

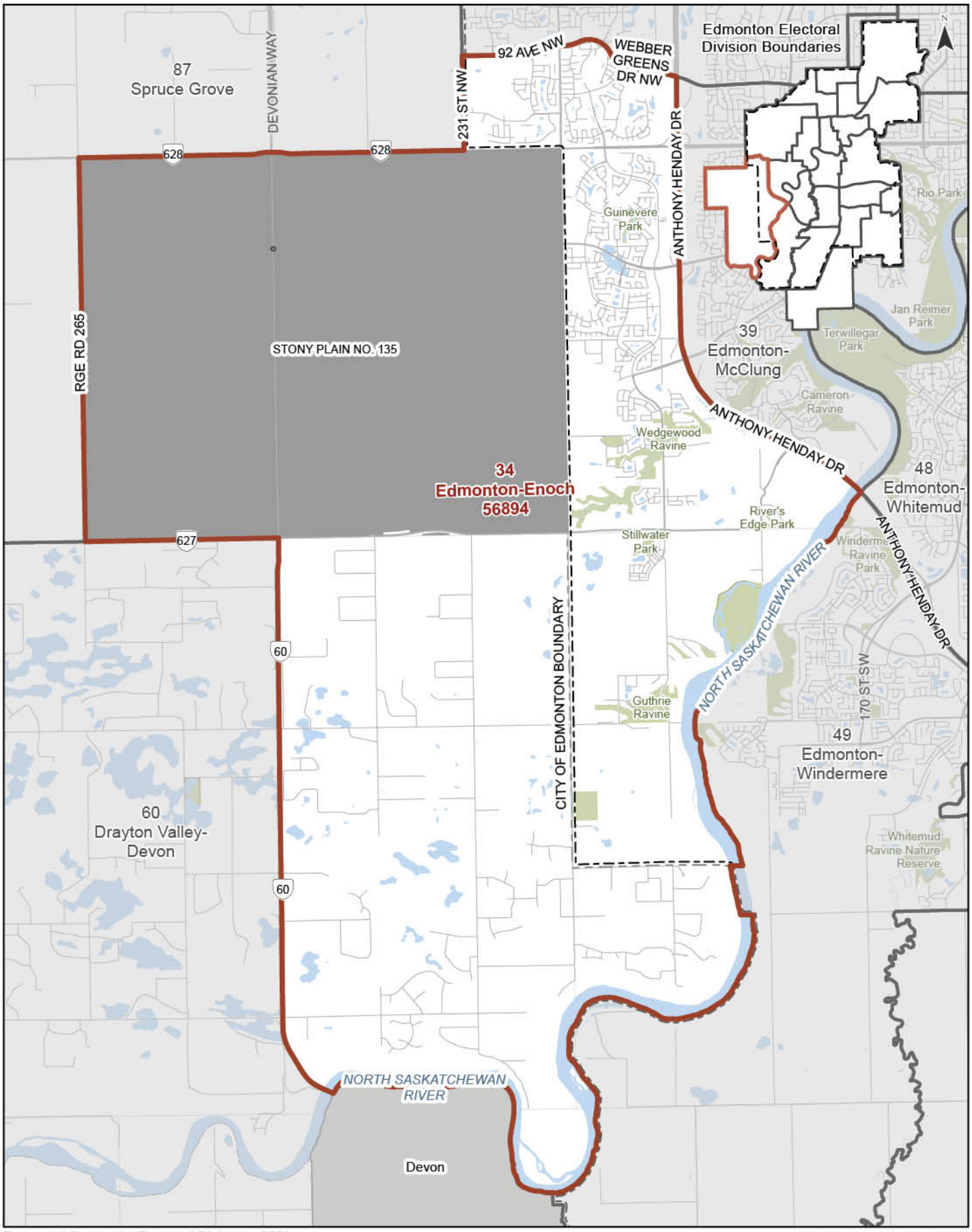


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Enoch

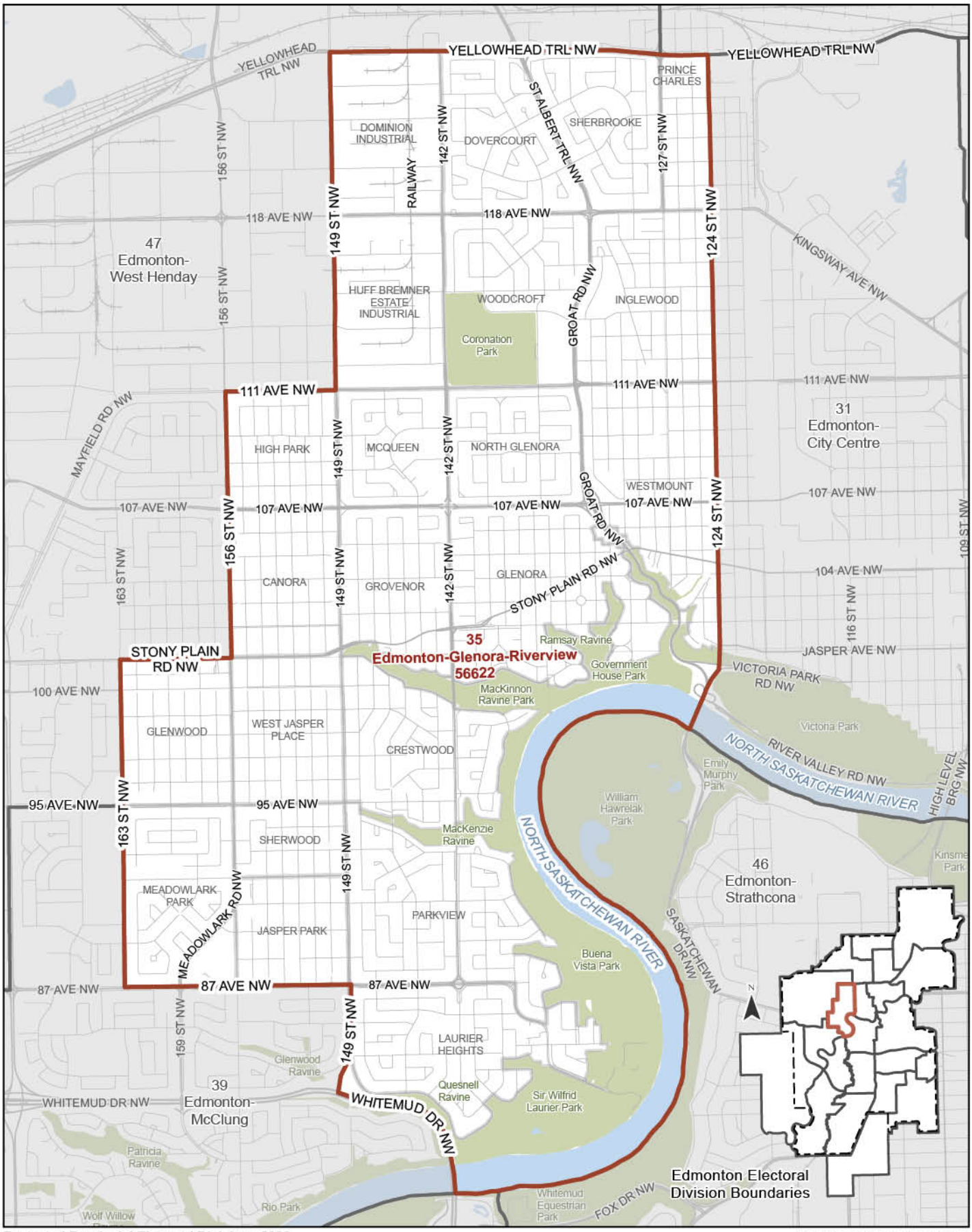
Estimated Population: 56,894



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Glenora-Riverview
Estimated Population: 56,622

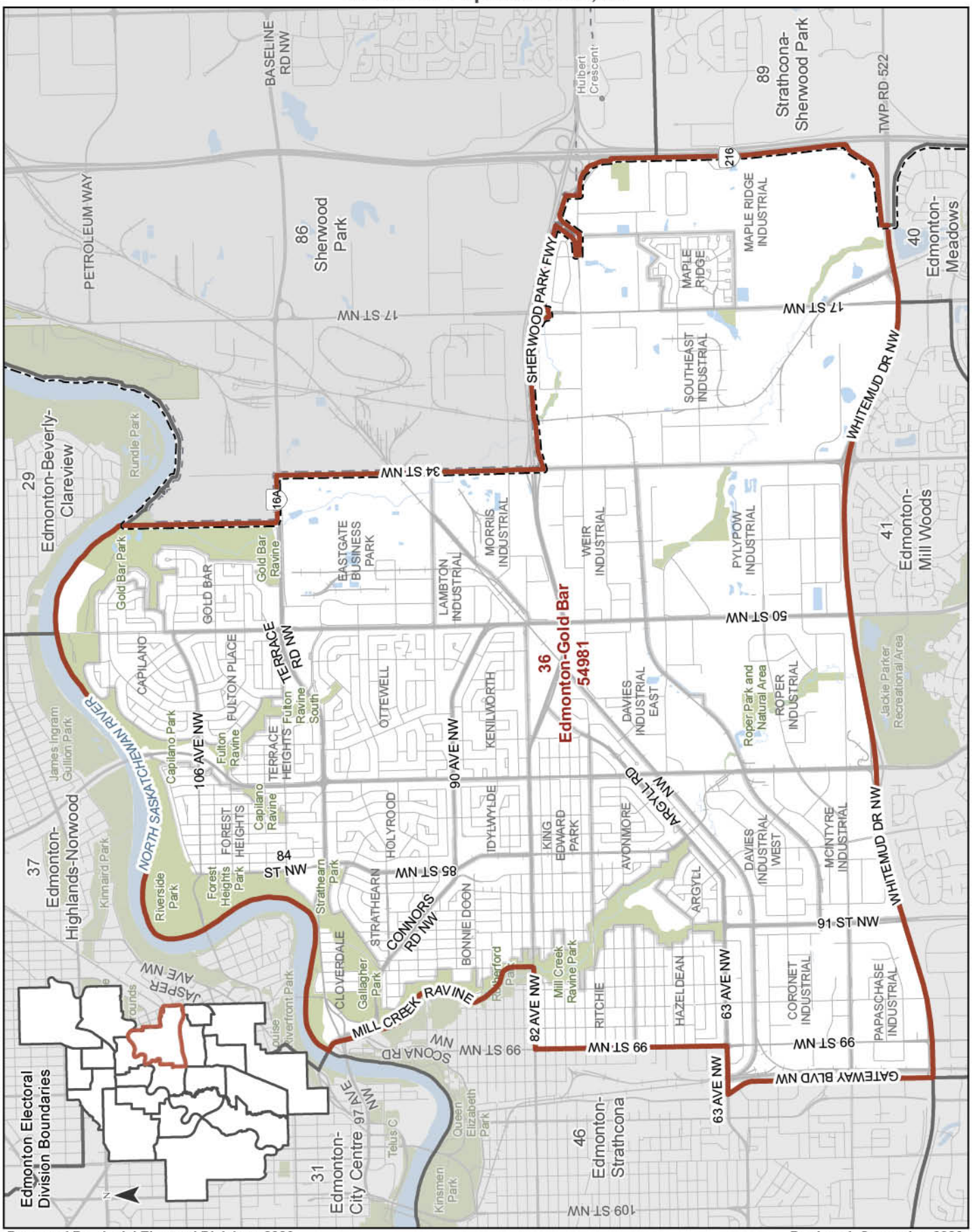


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Gold Bar

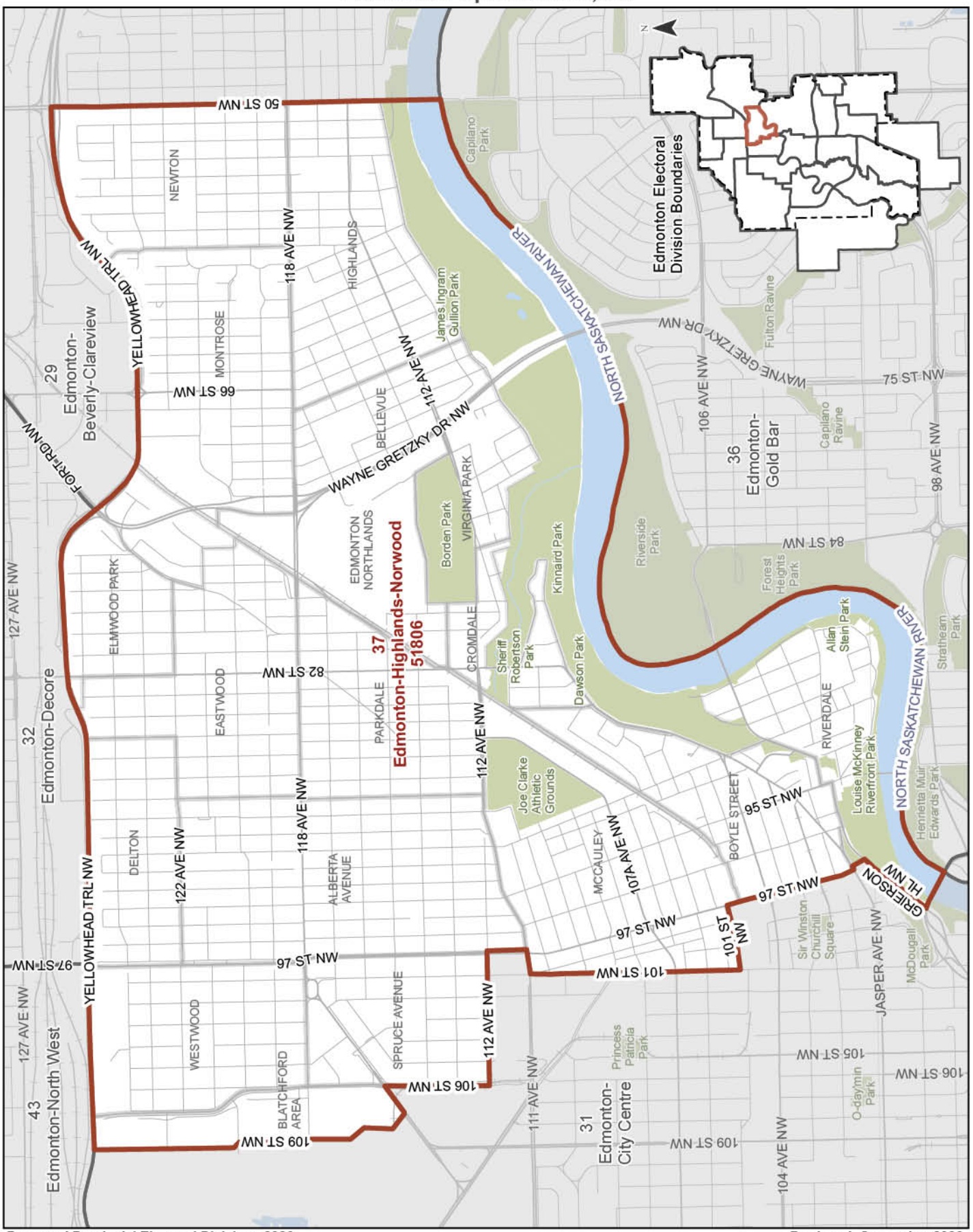
Estimated Population: 54,981



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Highlands-Norwood
Estimated Population: 51,806

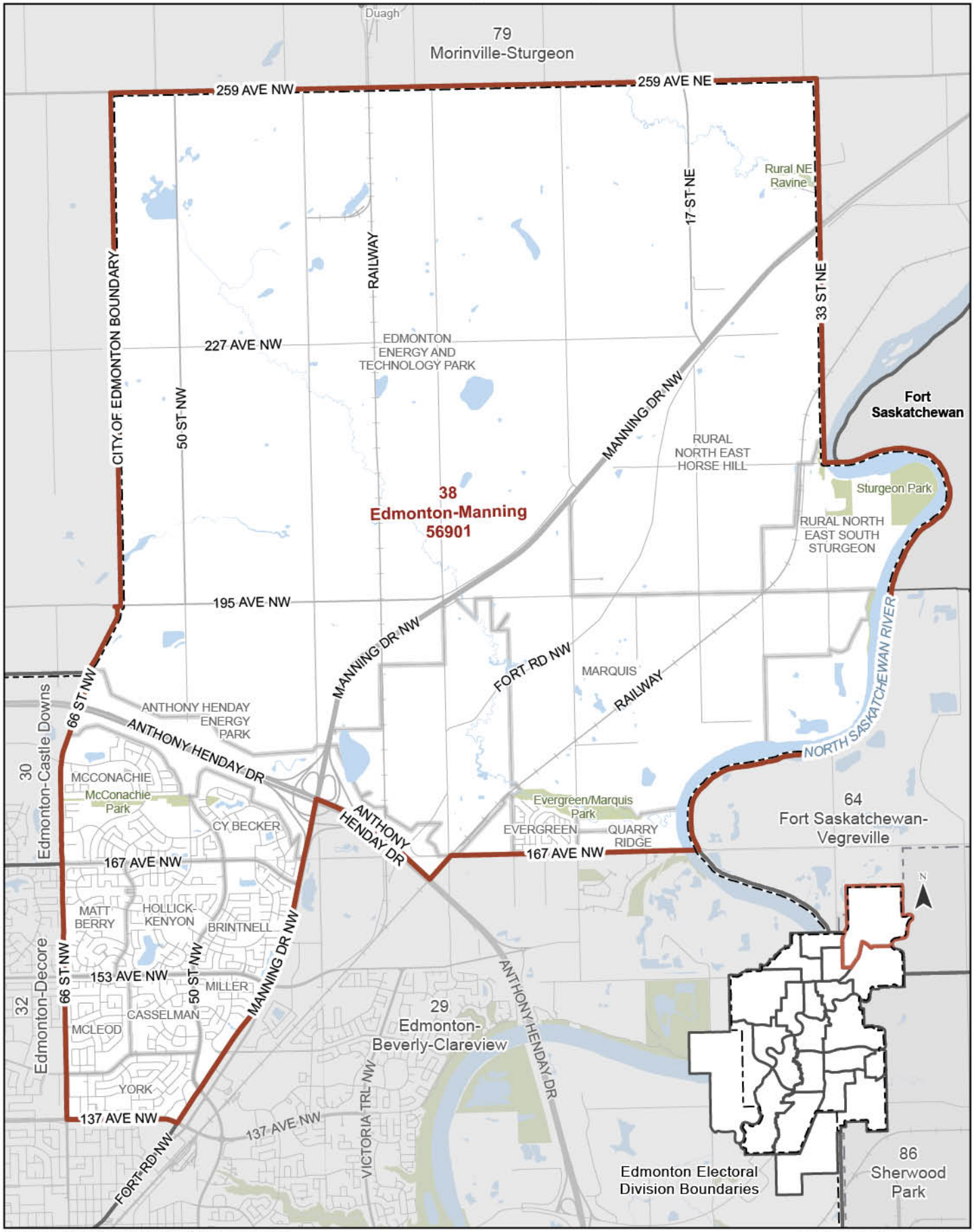


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Manning

Estimated Population: 56,901

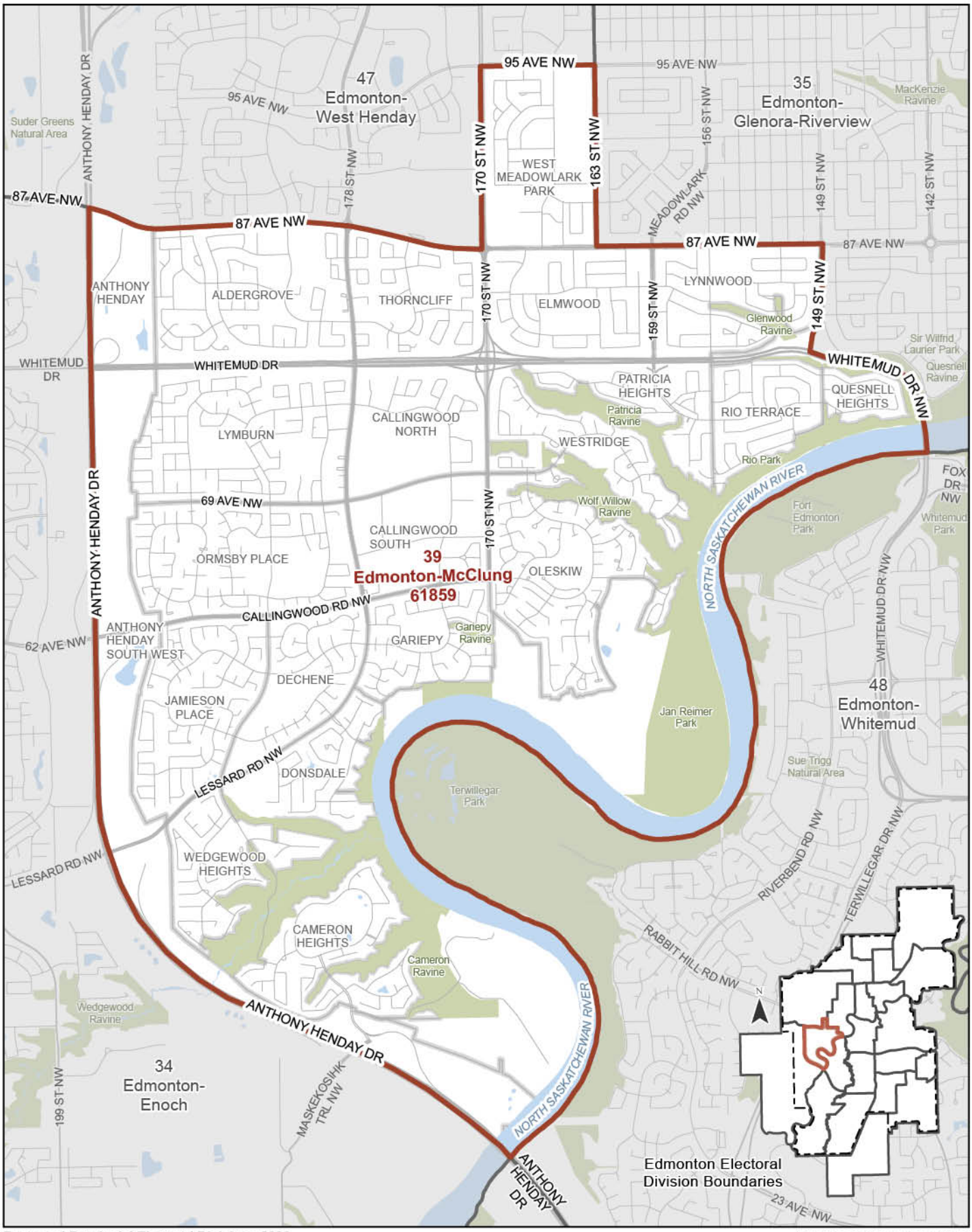


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-McClung

Estimated Population: 61,859

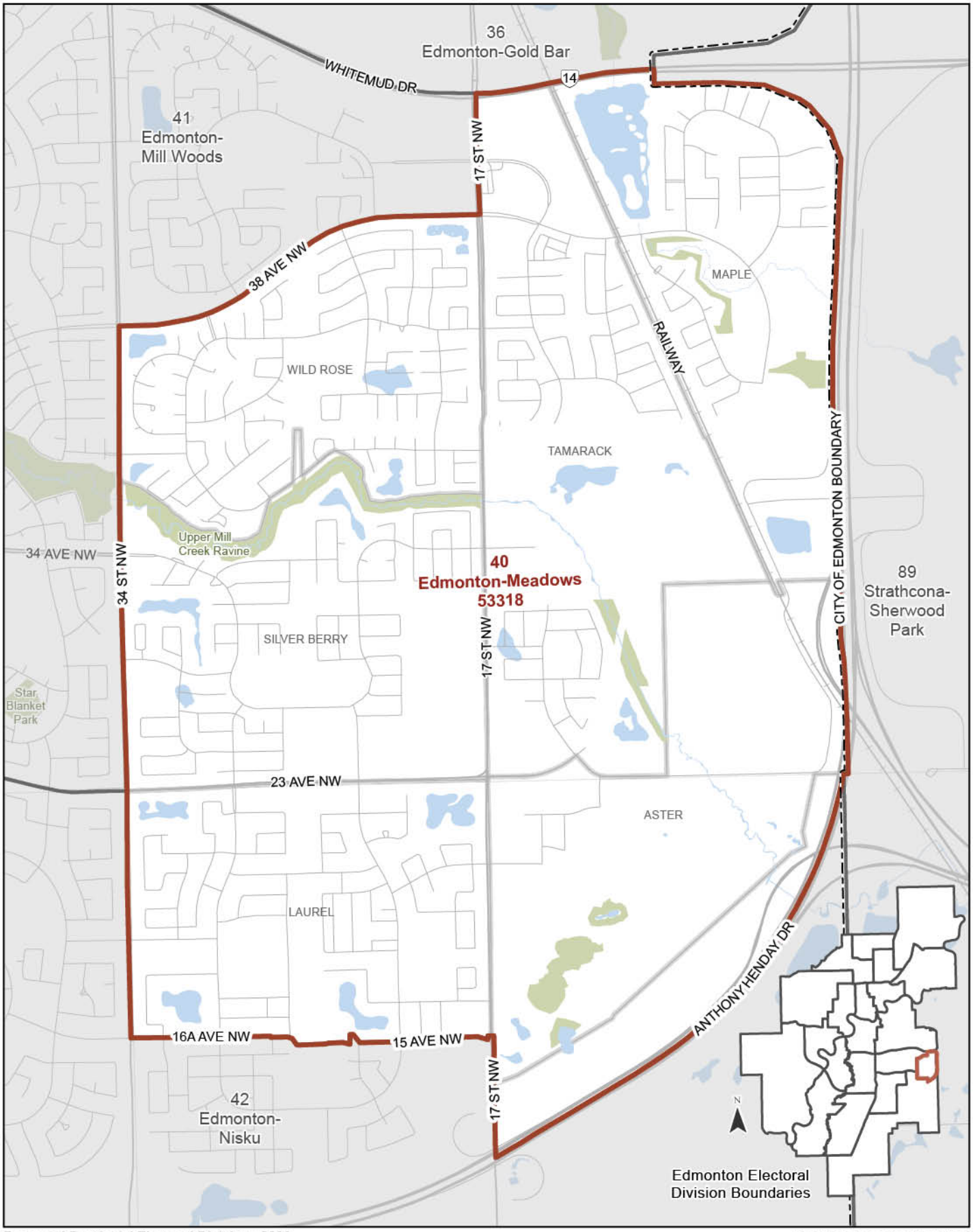


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Meadows

Estimated Population: 53,318

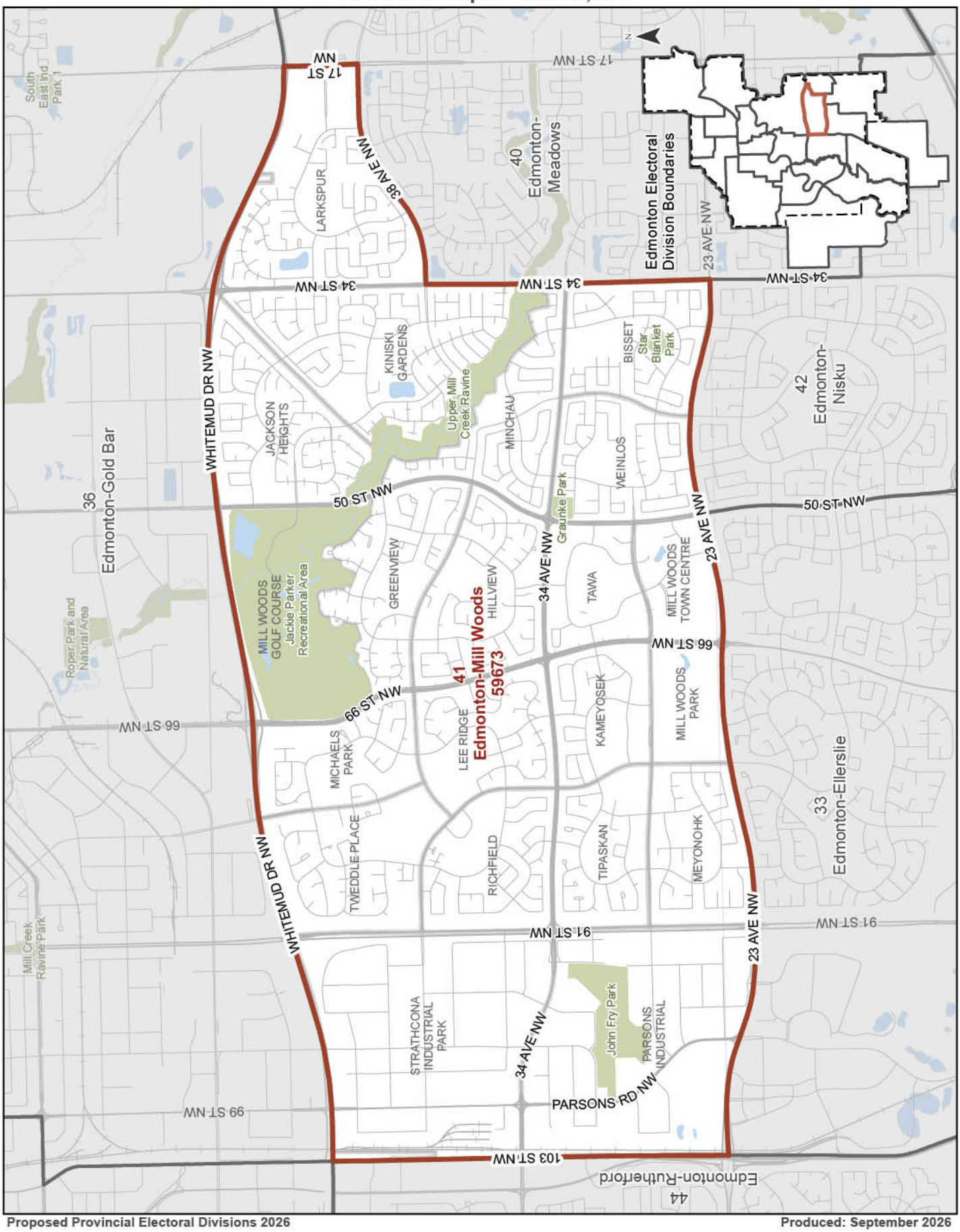


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Mill Woods

Estimated Population: 59,673

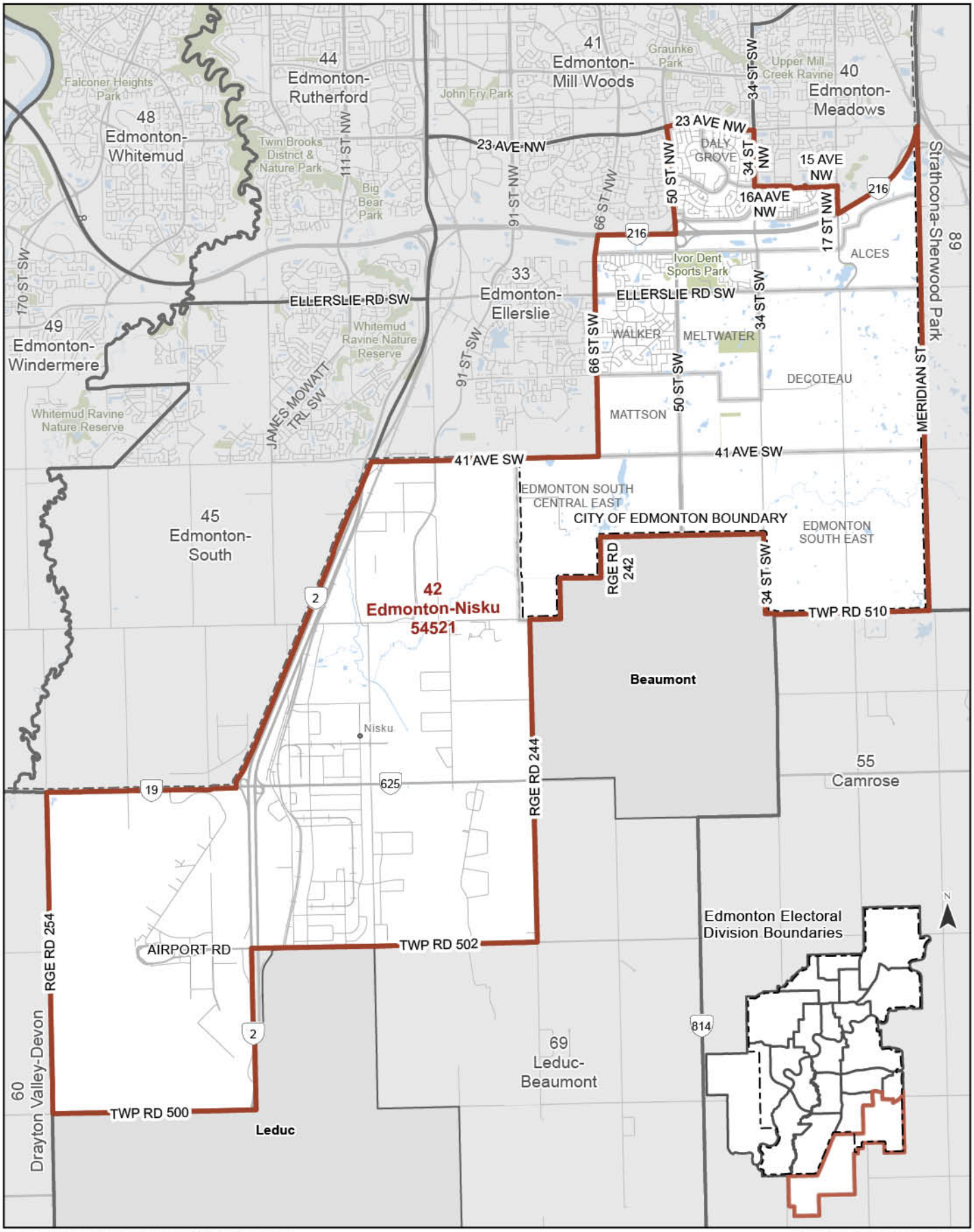


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Nisku

Estimated Population: 54,521

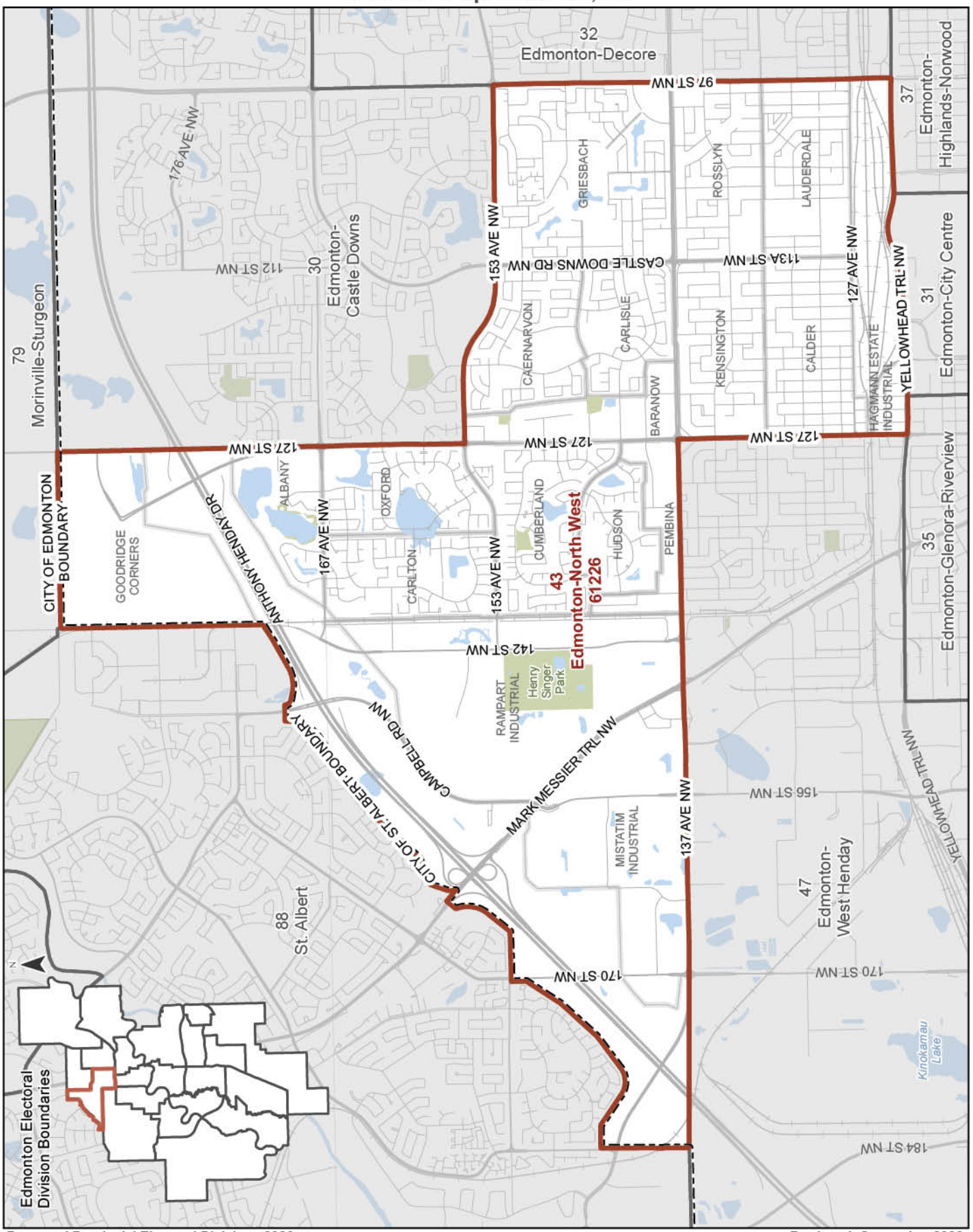


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-North West

Estimated Population: 61,226

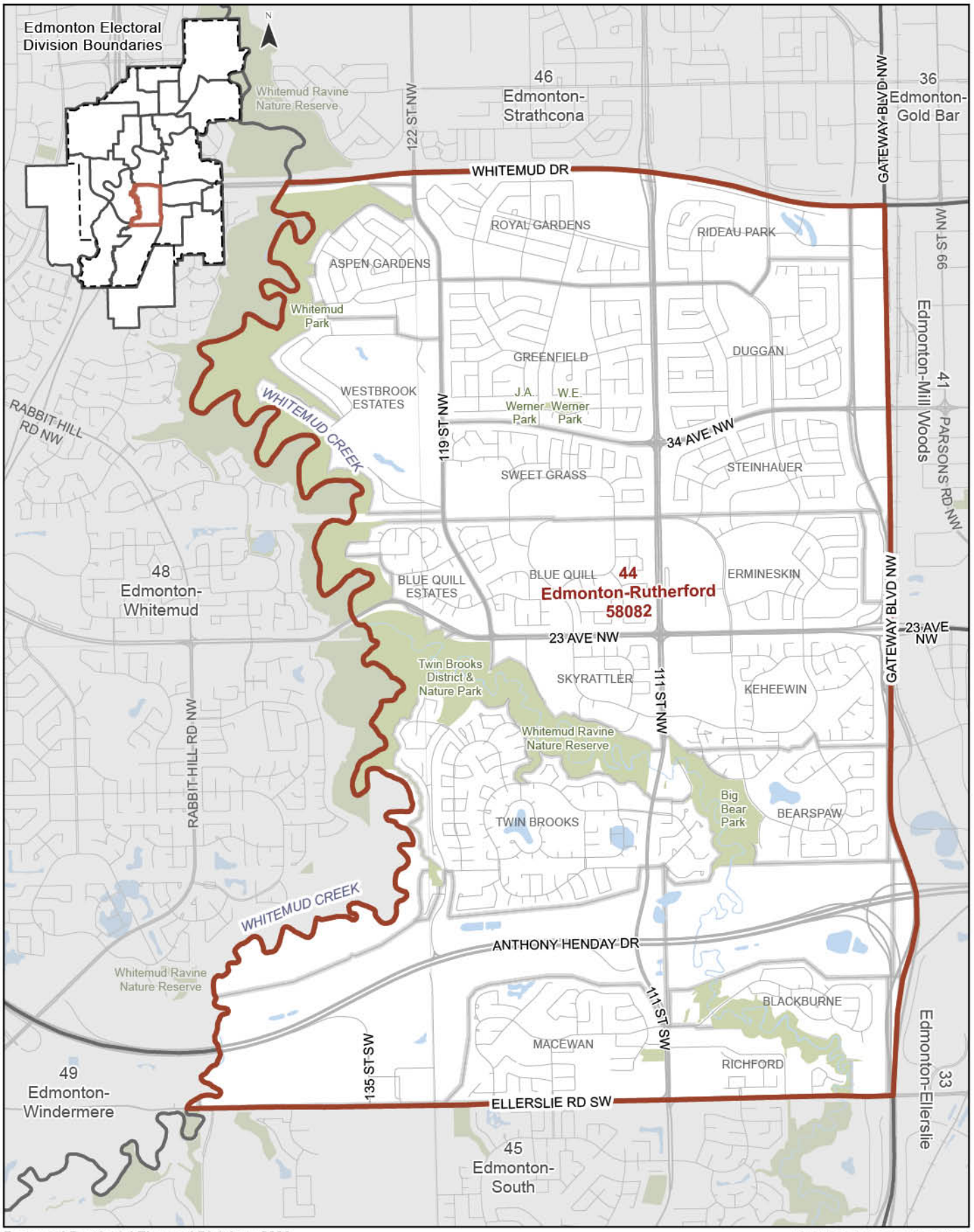


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Rutherford

Estimated Population: 58,082

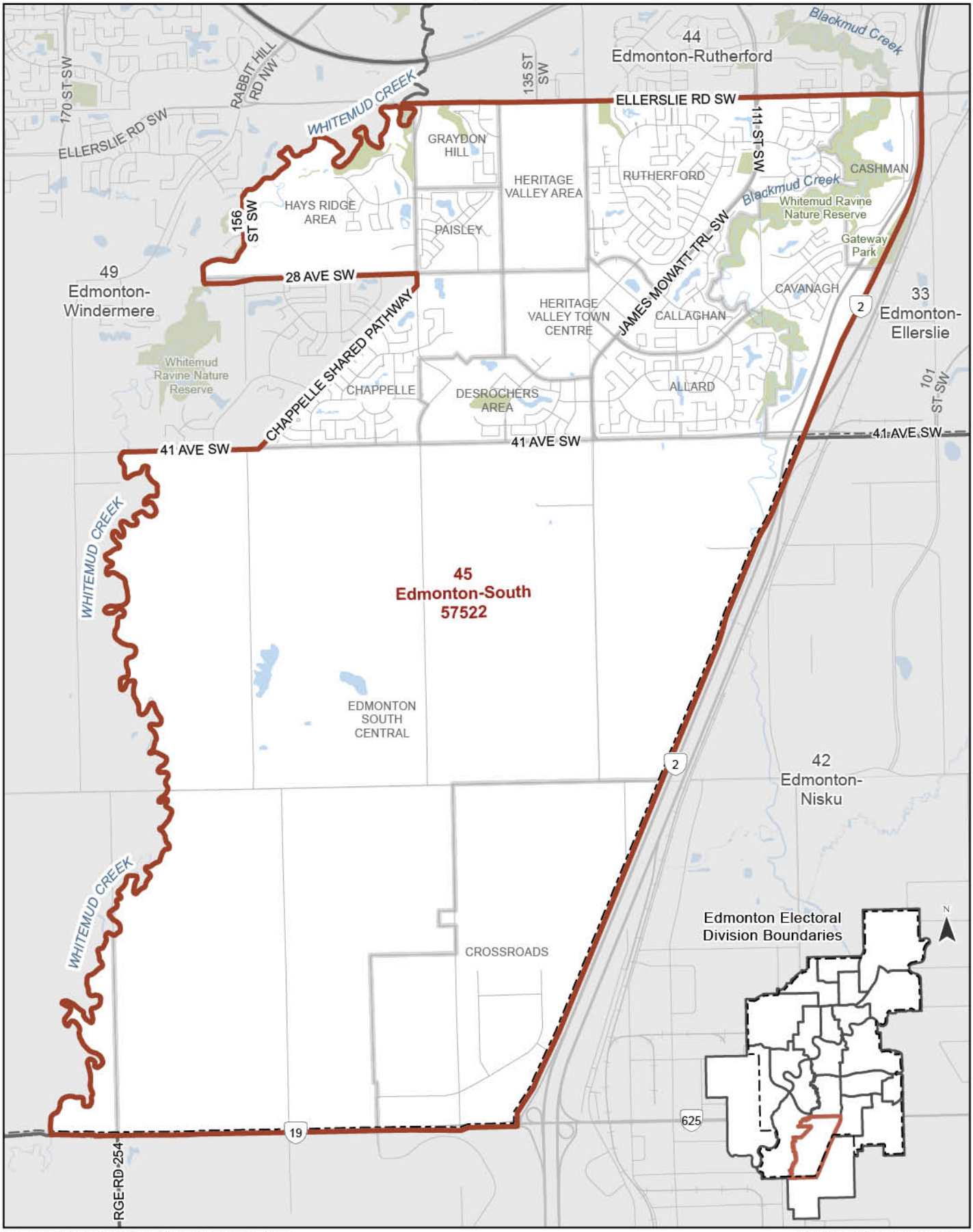


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-South

Estimated Population: 57,522

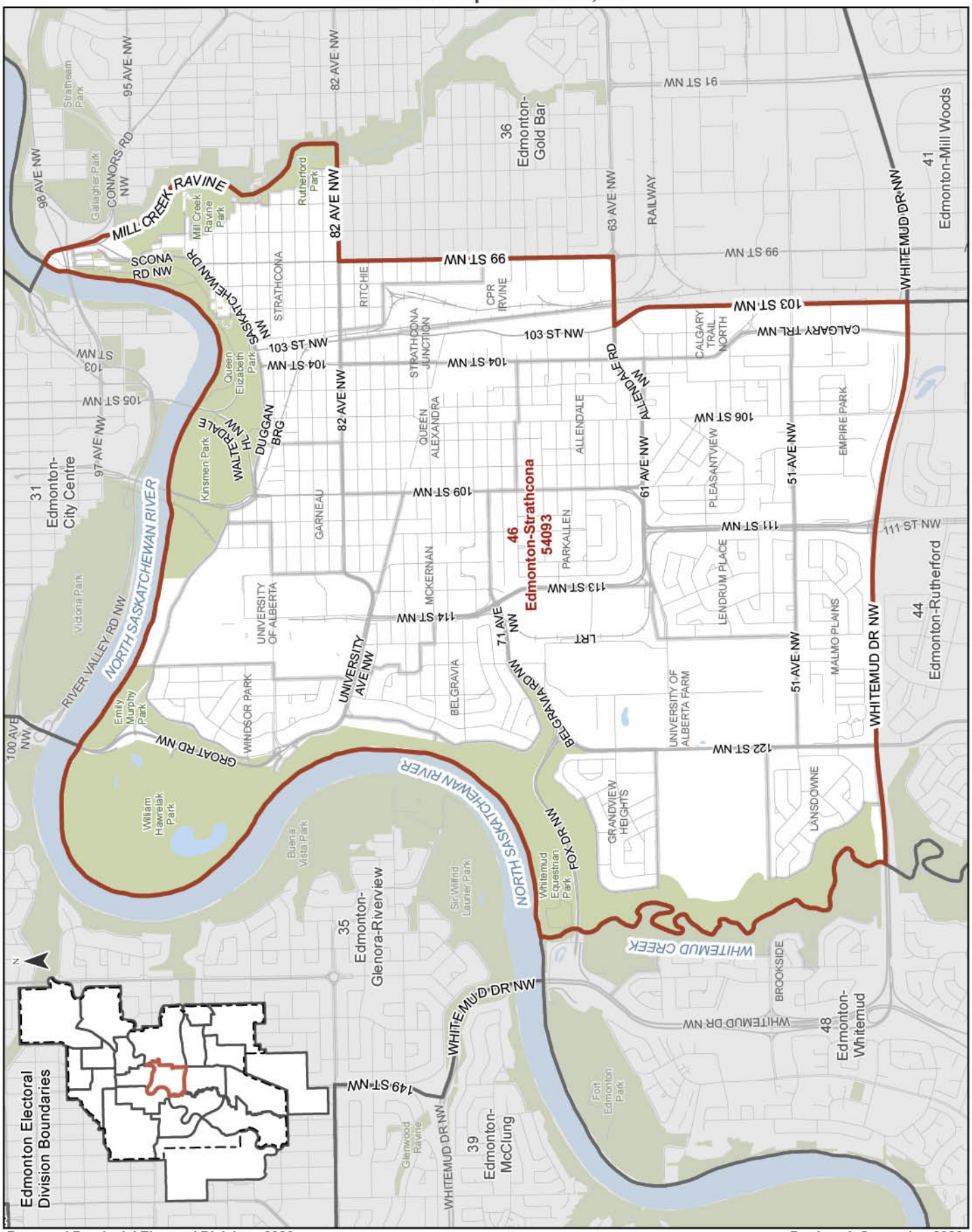


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Strathcona

Estimated Population: 54,093

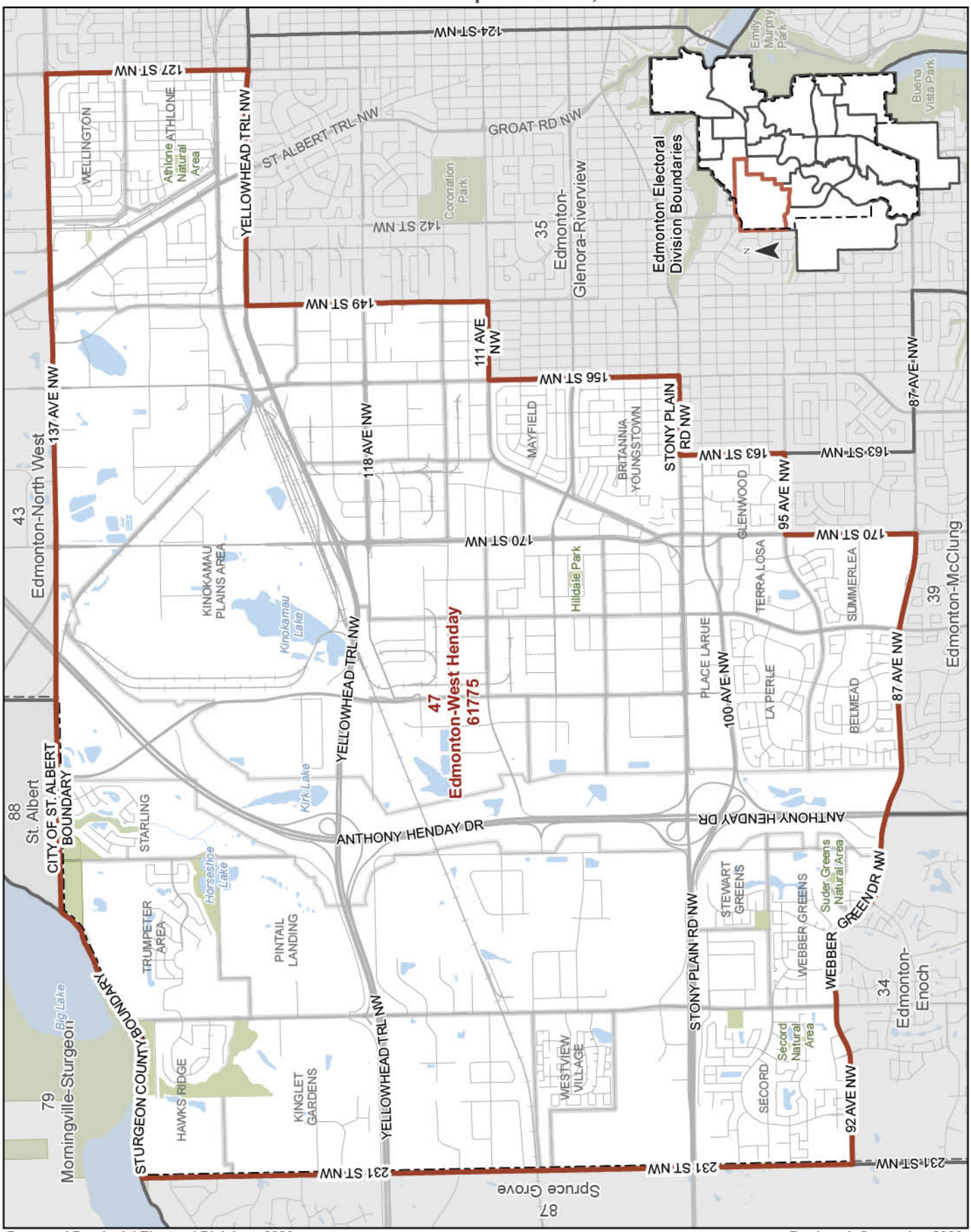


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-West Henday

Estimated Population: 61,775

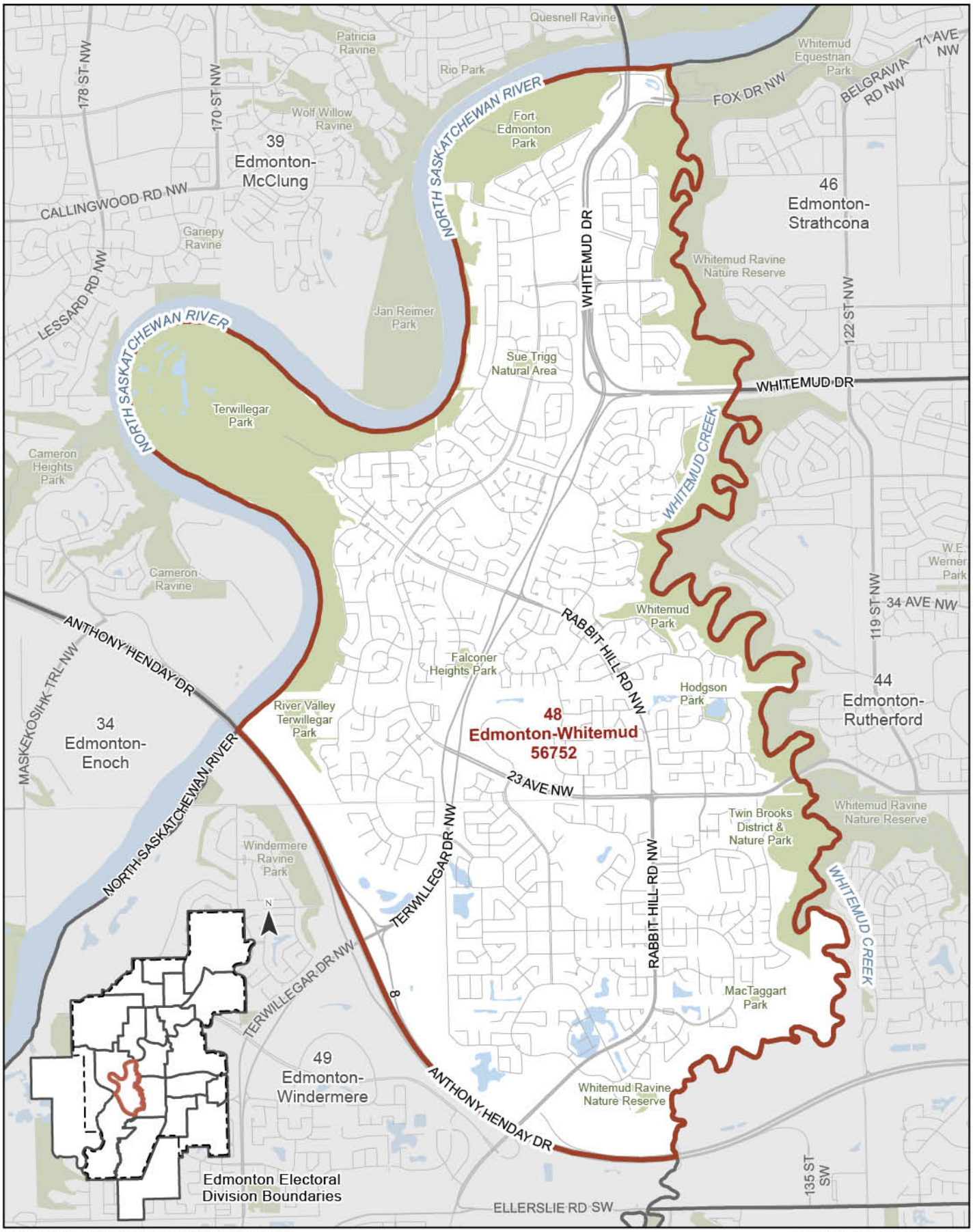


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Edmonton-Whitemud

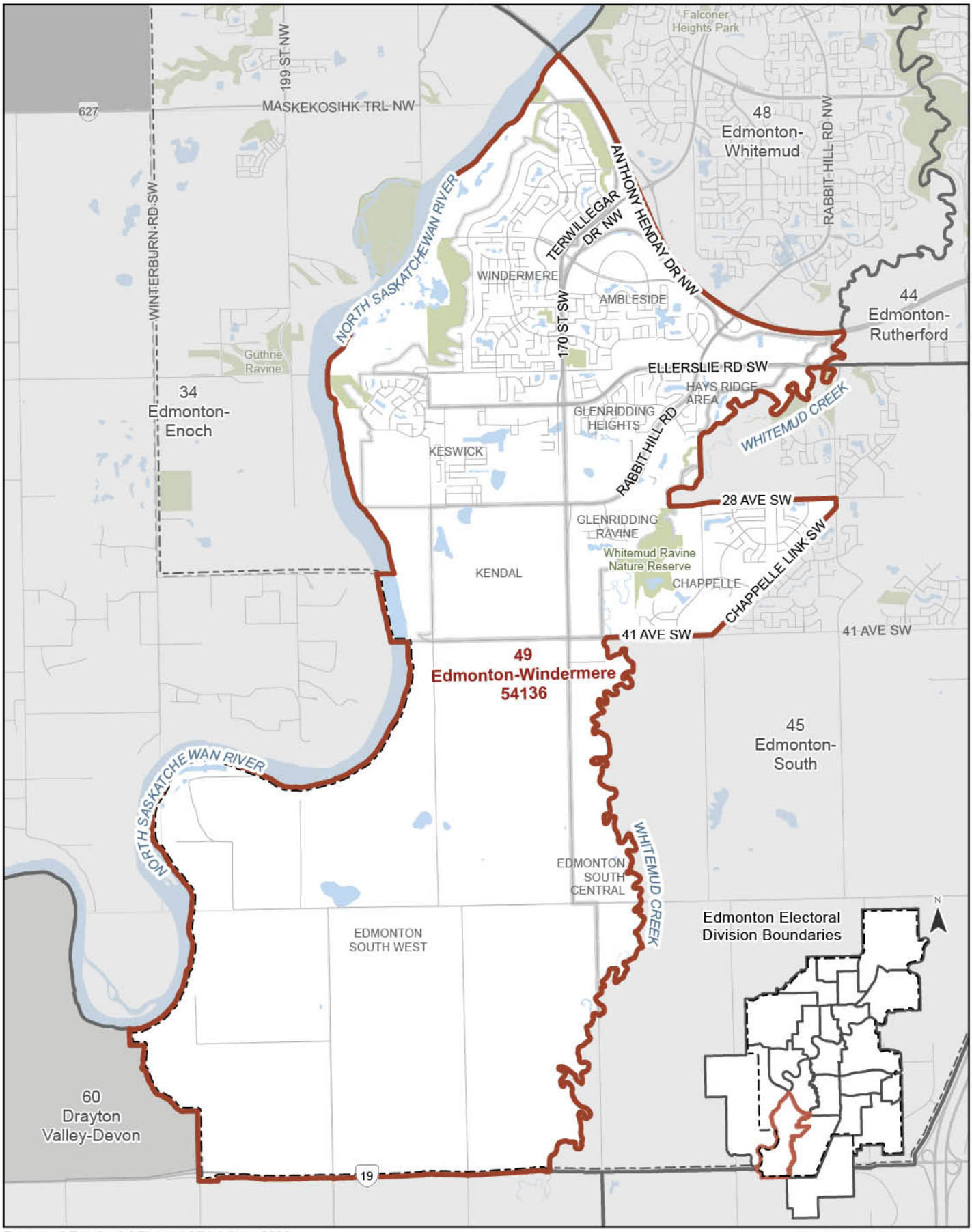
Estimated Population: 56,752



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

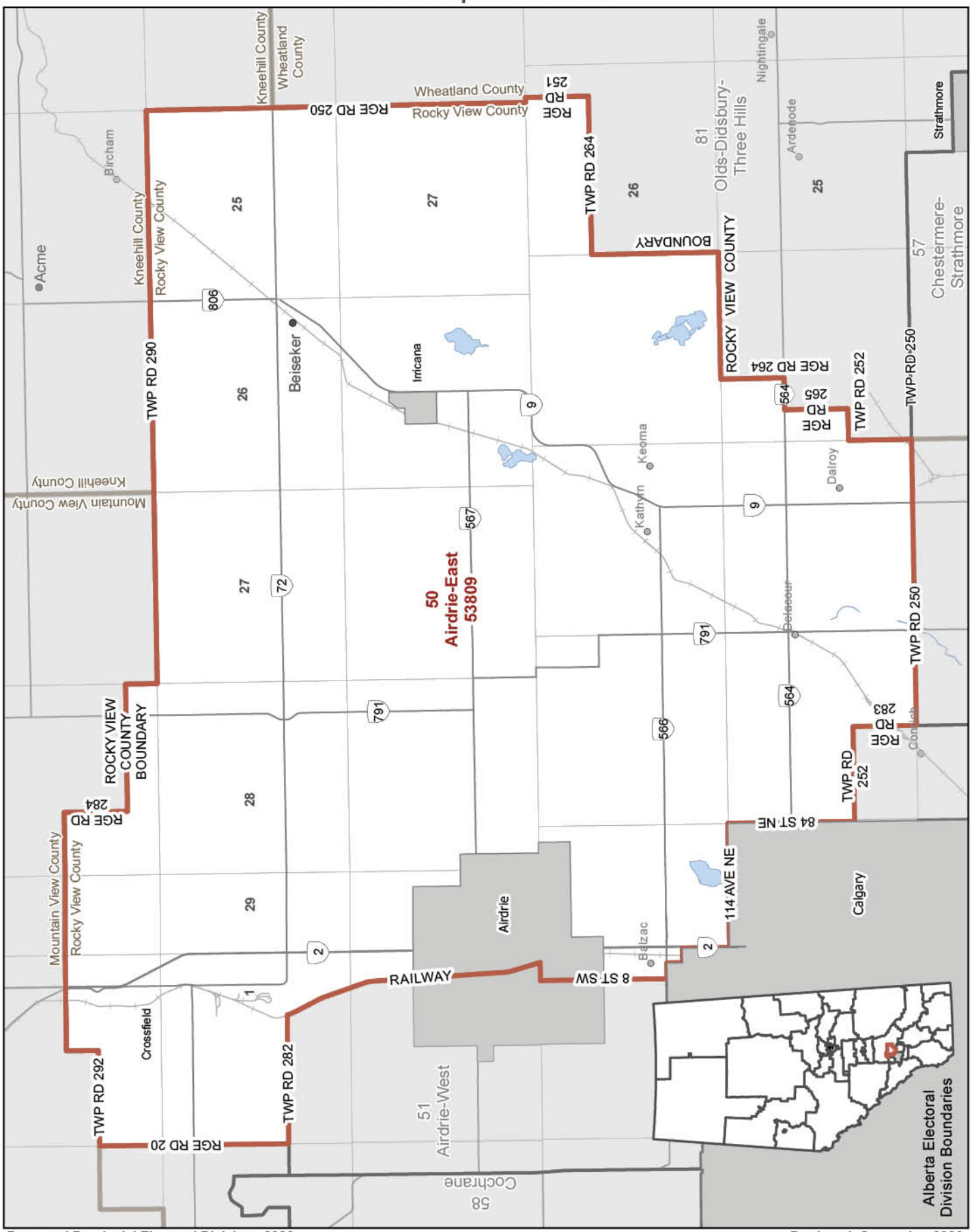
Edmonton-Windermere
Estimated Population: 54,136



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

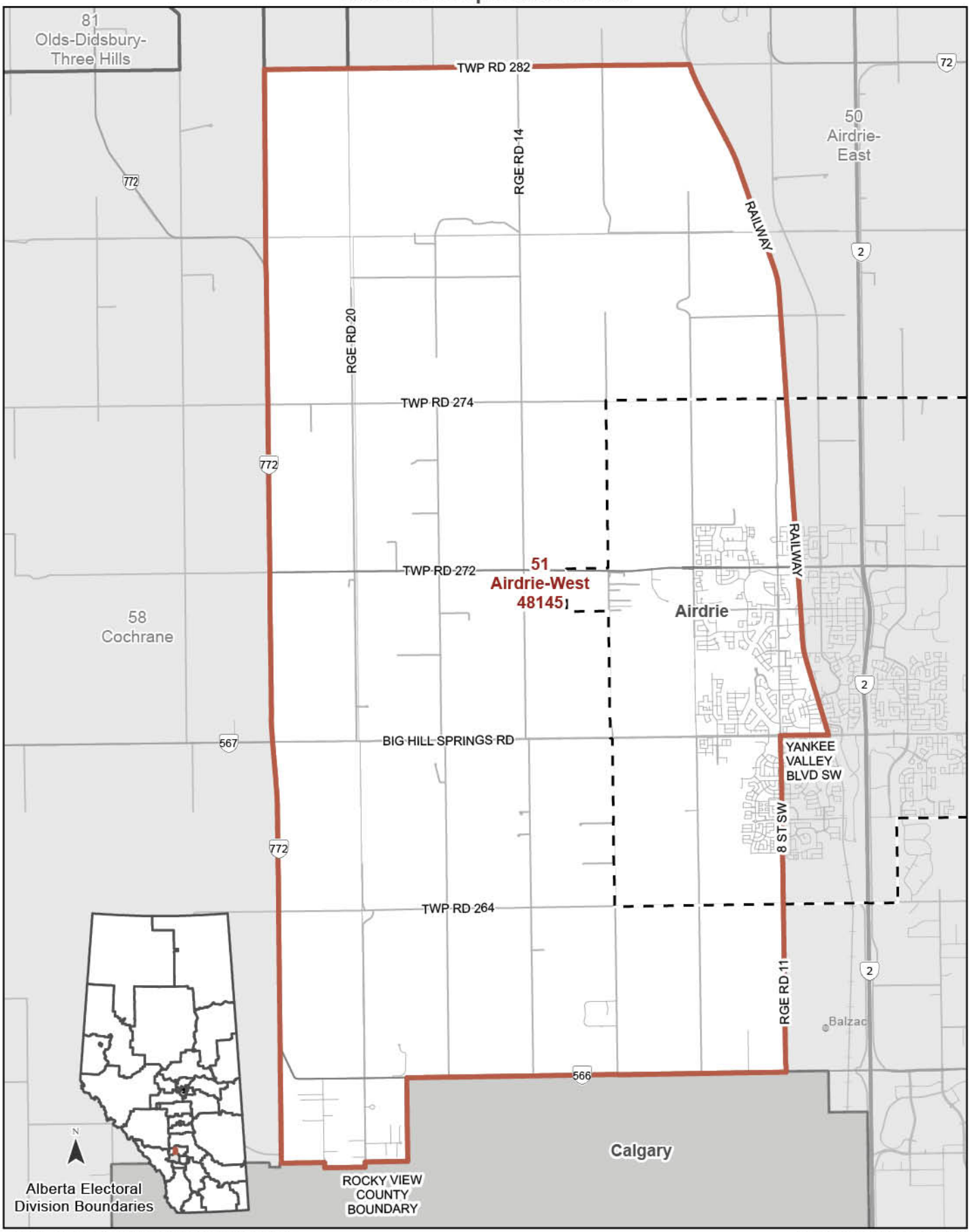
Airdrie-East
Estimated Population: 53809



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Airdrie-West
Estimated Population: 48145

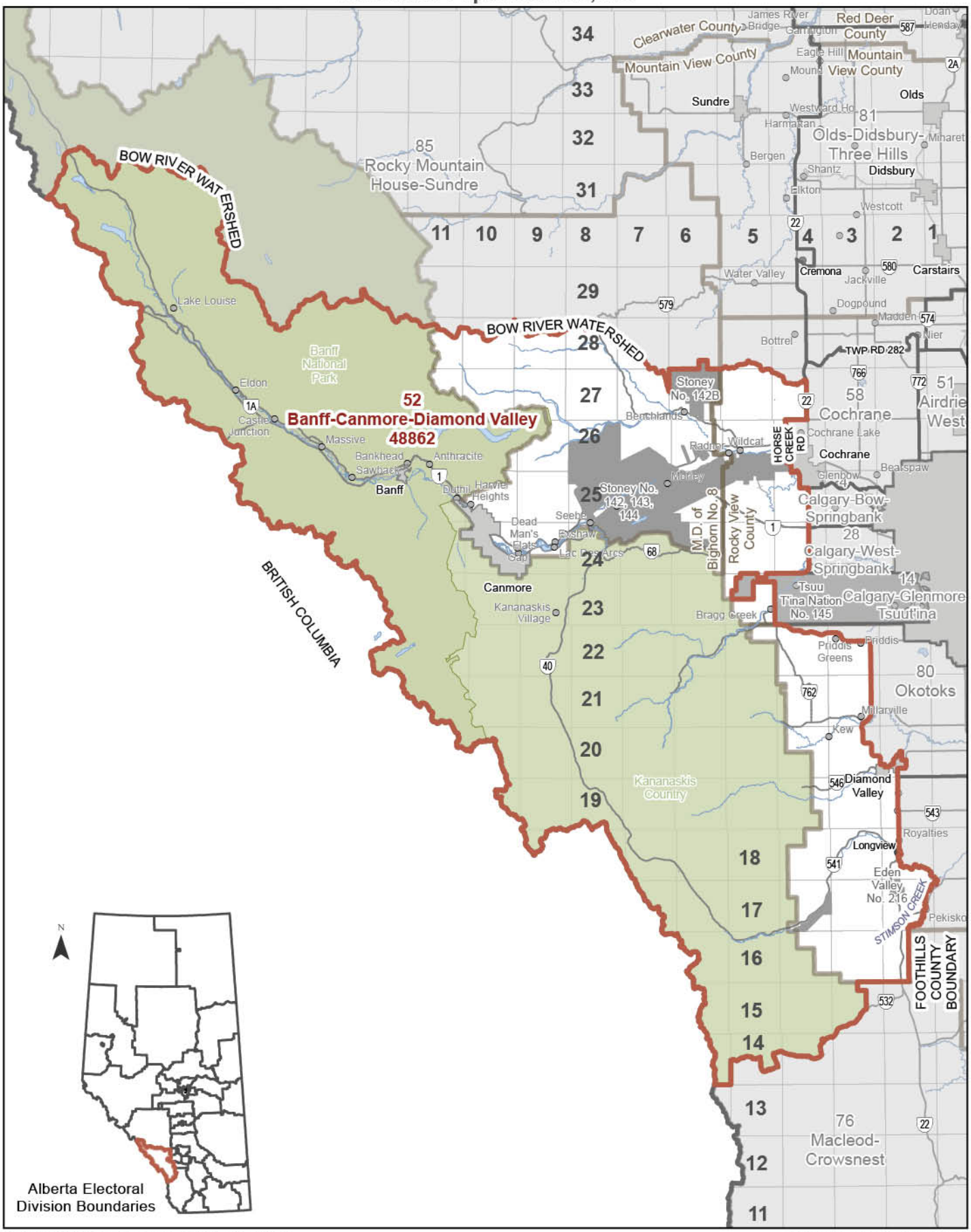


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Banff-Canmore-Diamond Valley

Estimated Population: 48,862

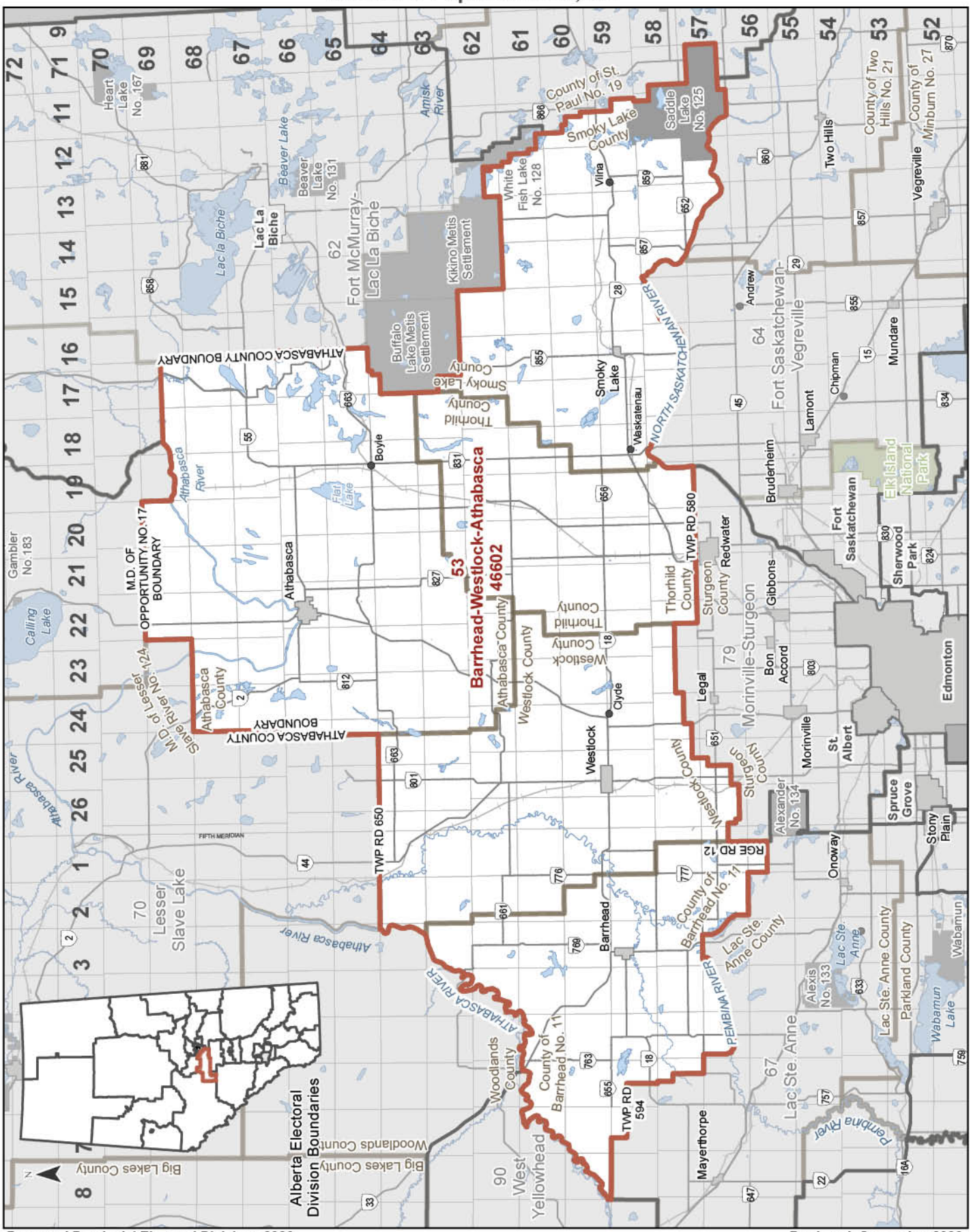


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Barrhead-Westlock-Athabasca

Estimated Population: 46,602

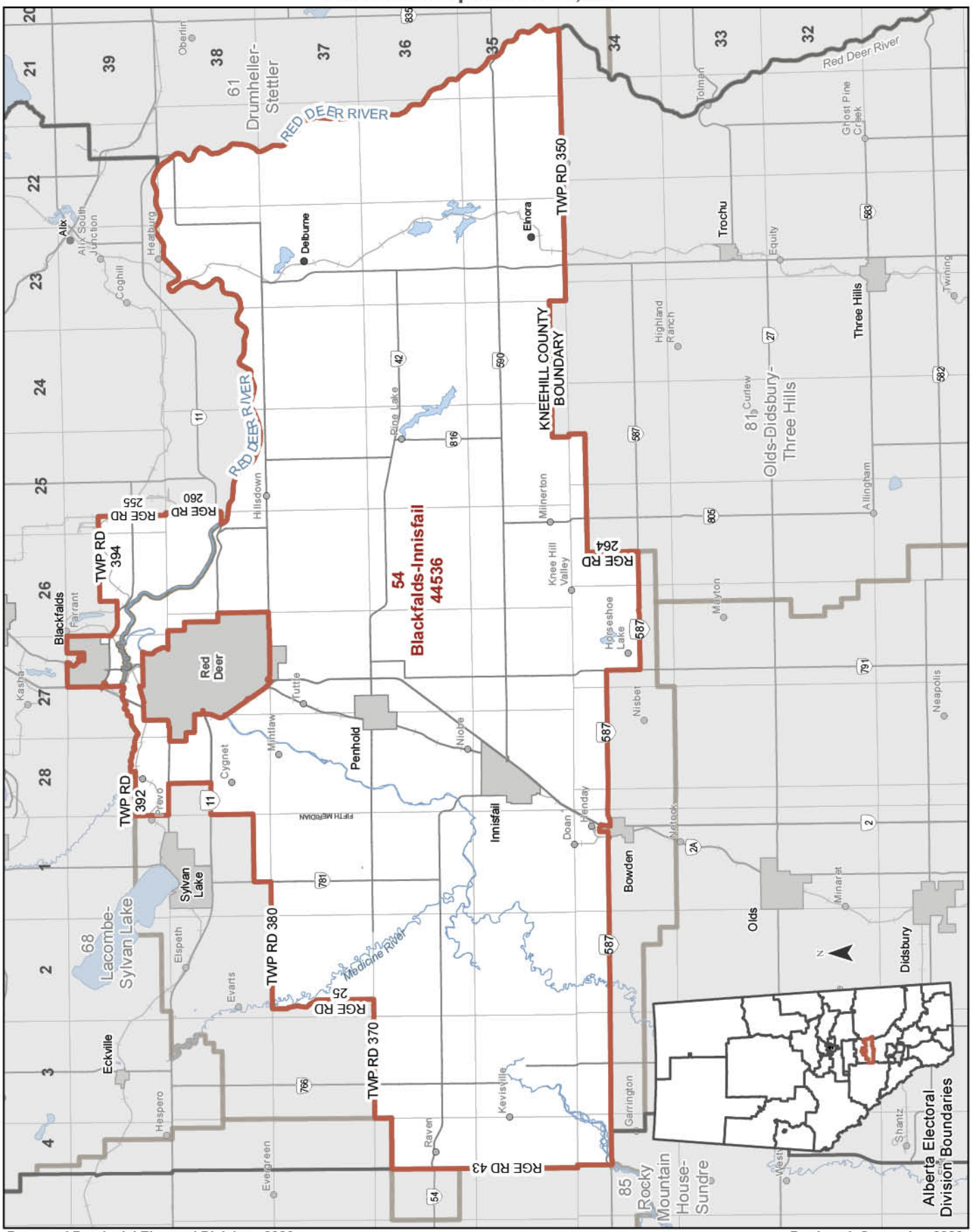


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Blackfalds-Innisfail

Estimated Population: 44,536

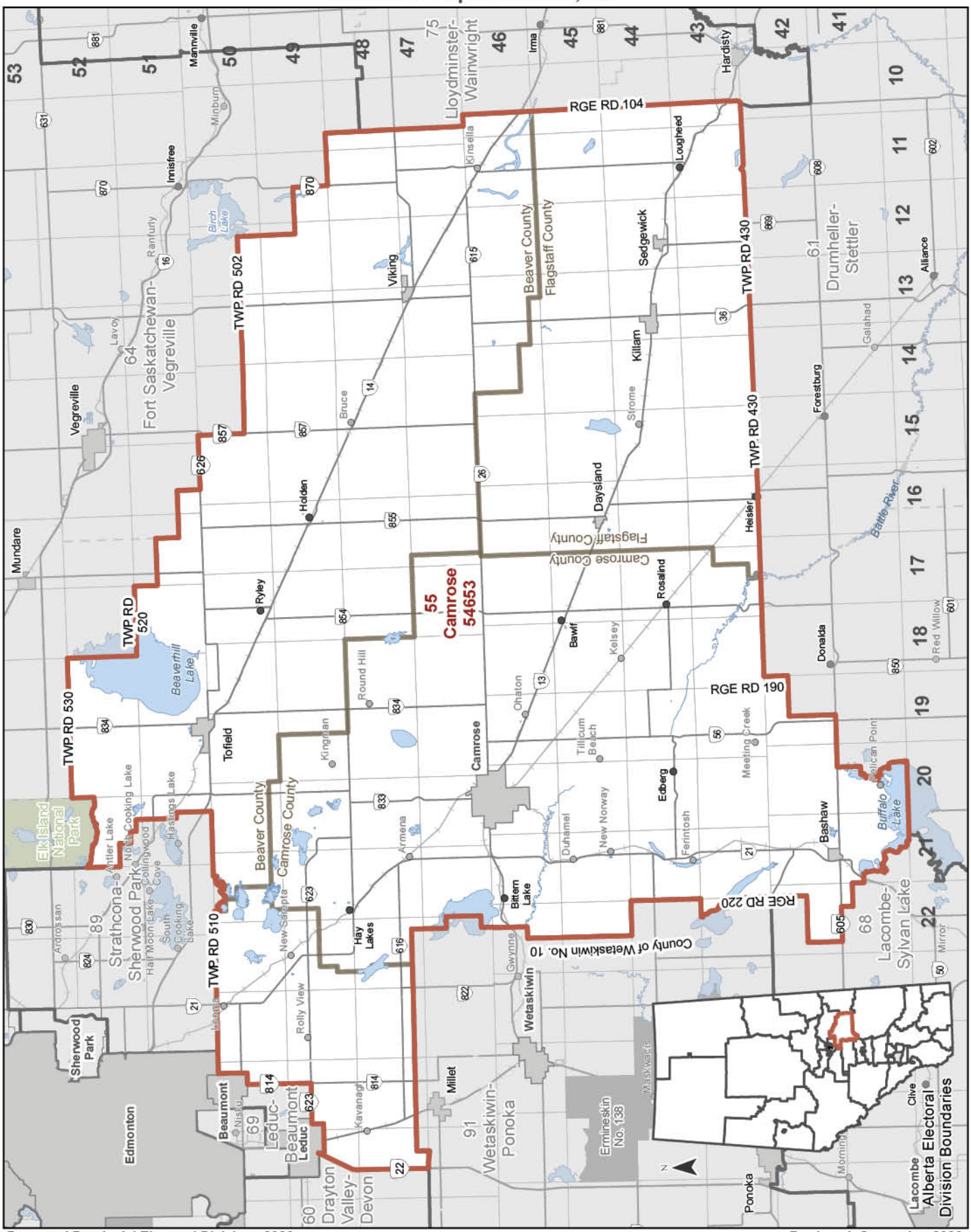


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Camrose

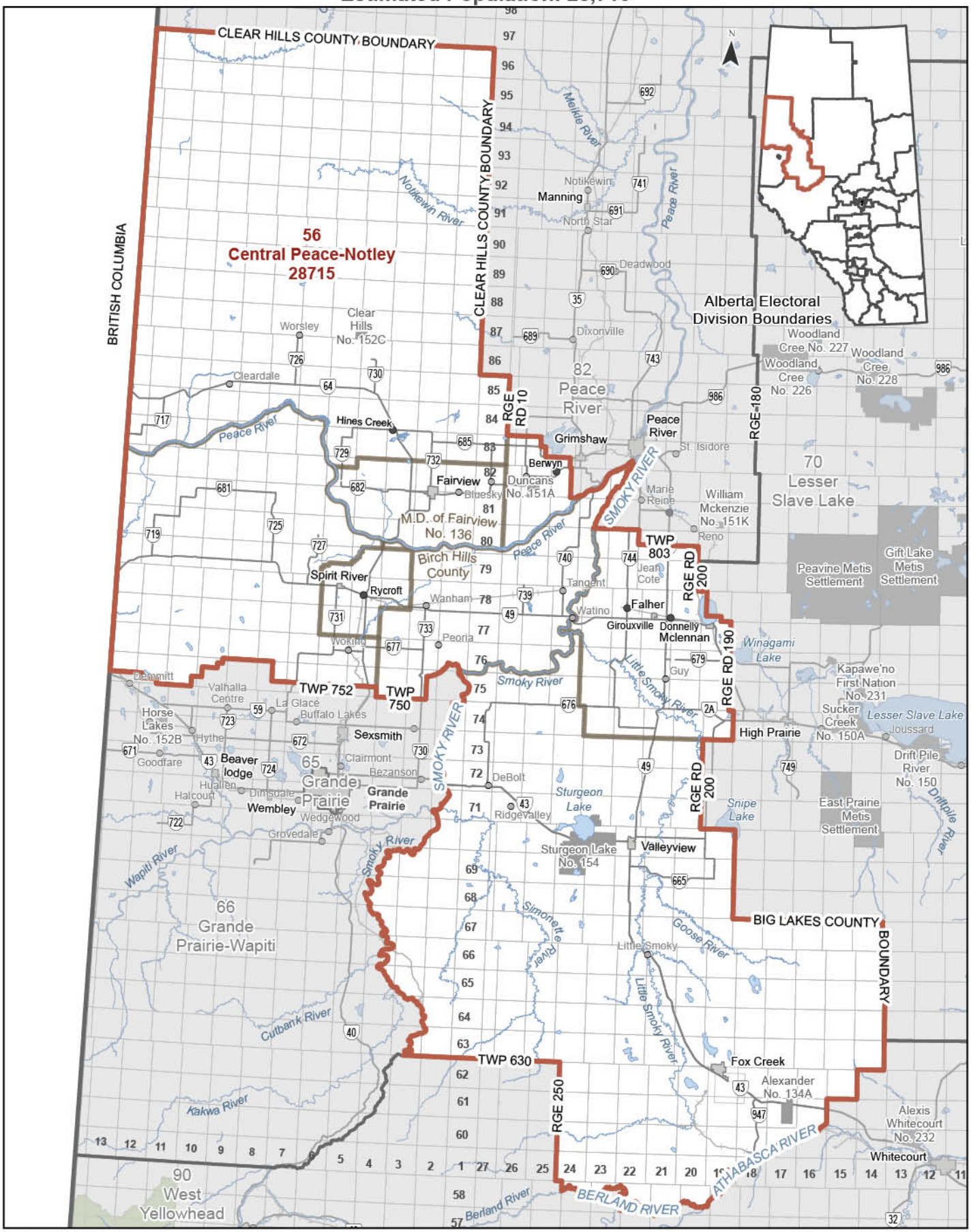
Estimated Population: 54,653



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

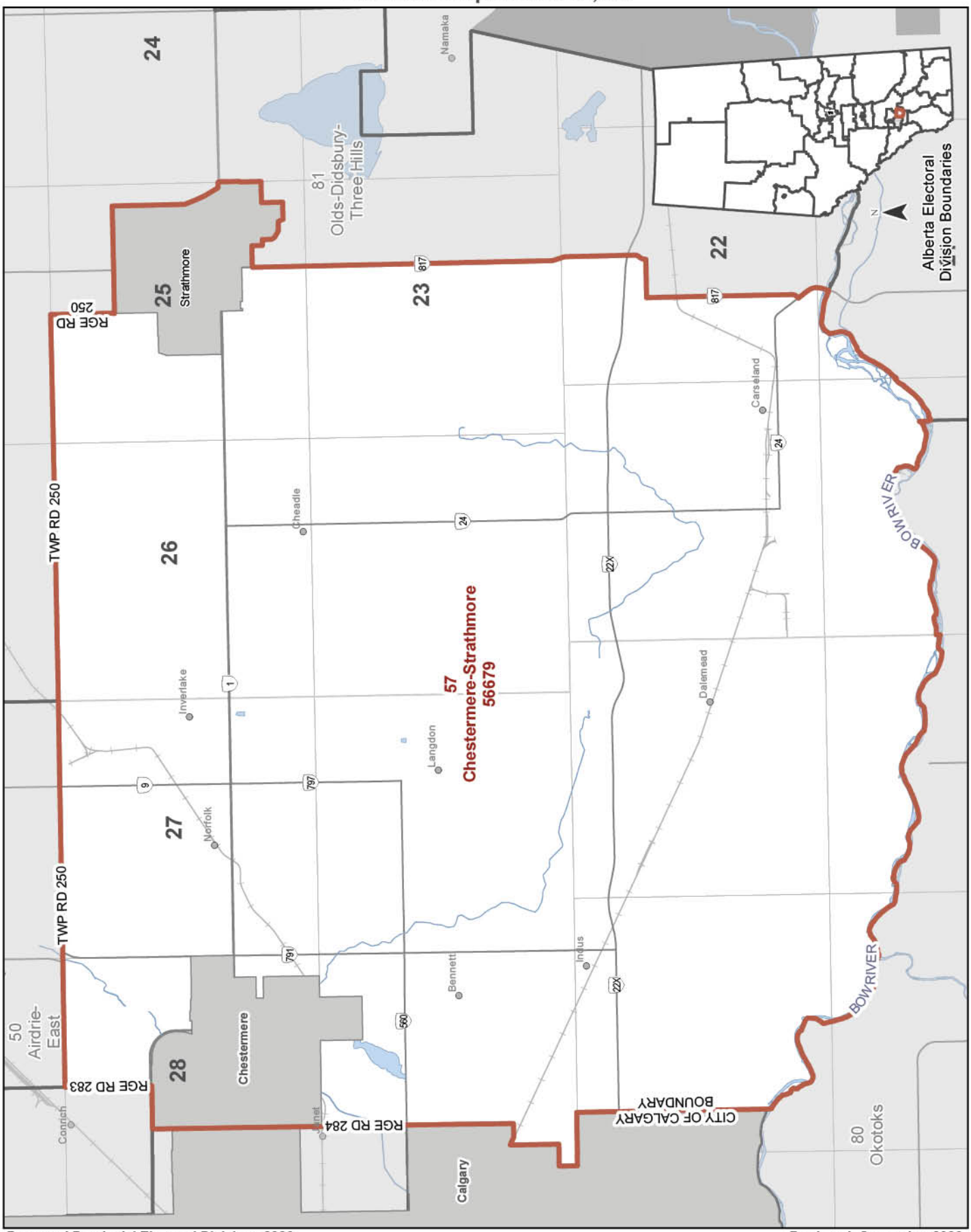
Central Peace-Notley
Estimated Population: 28,715



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Chestermere-Strathmore
Estimated Population: 56,679

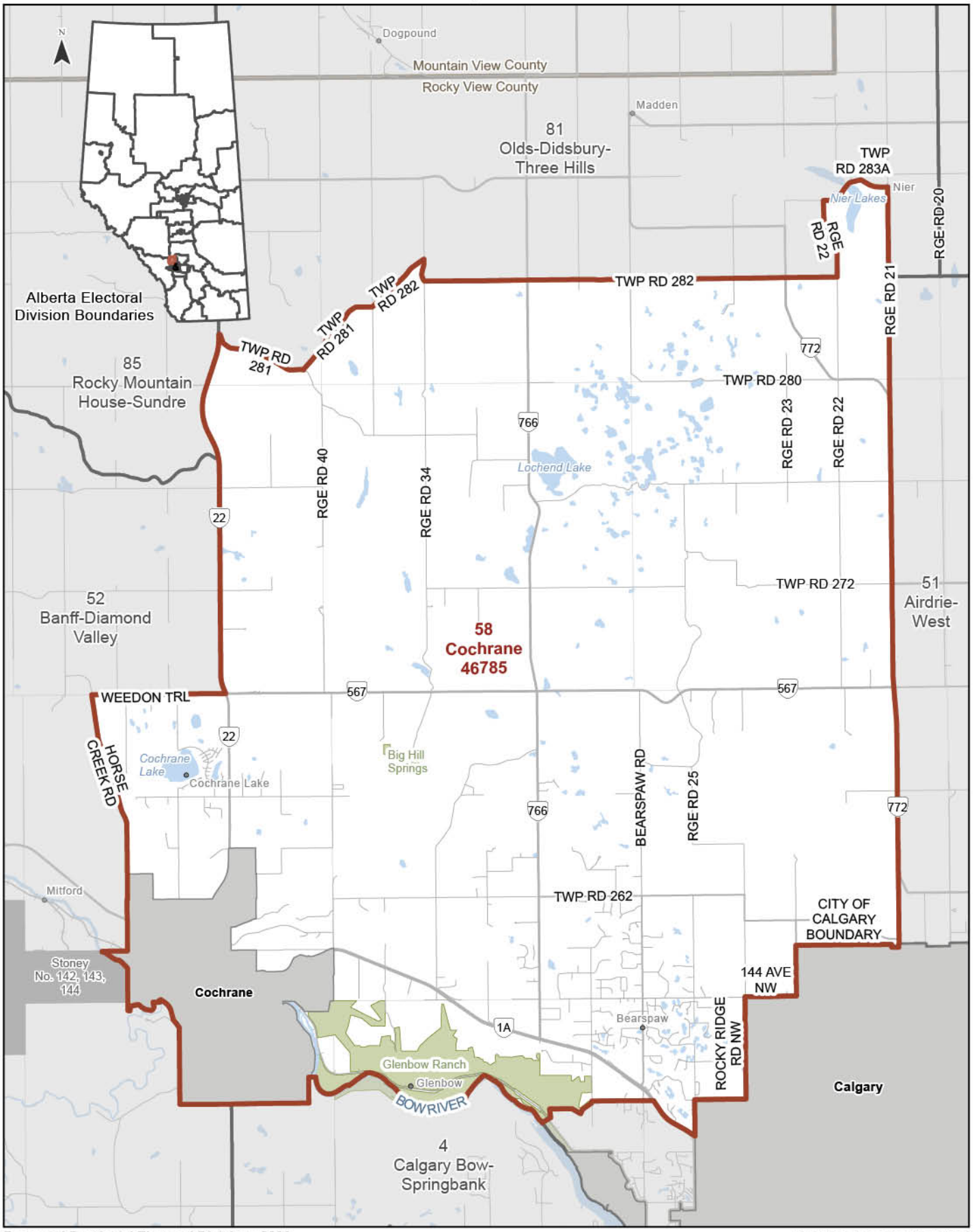


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Cochrane

Estimated Population: 46,785

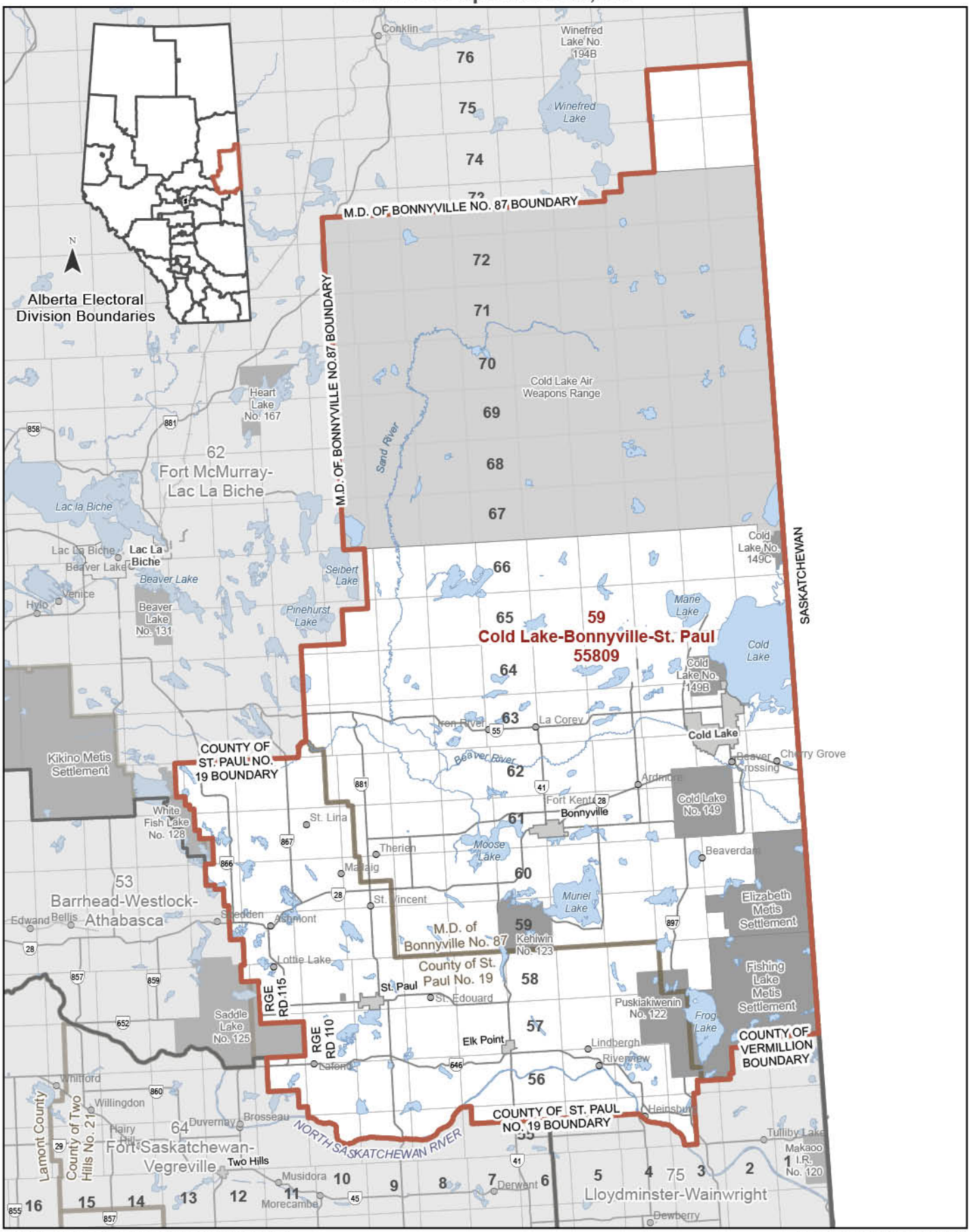


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Cold Lake-Bonnyville-St. Paul

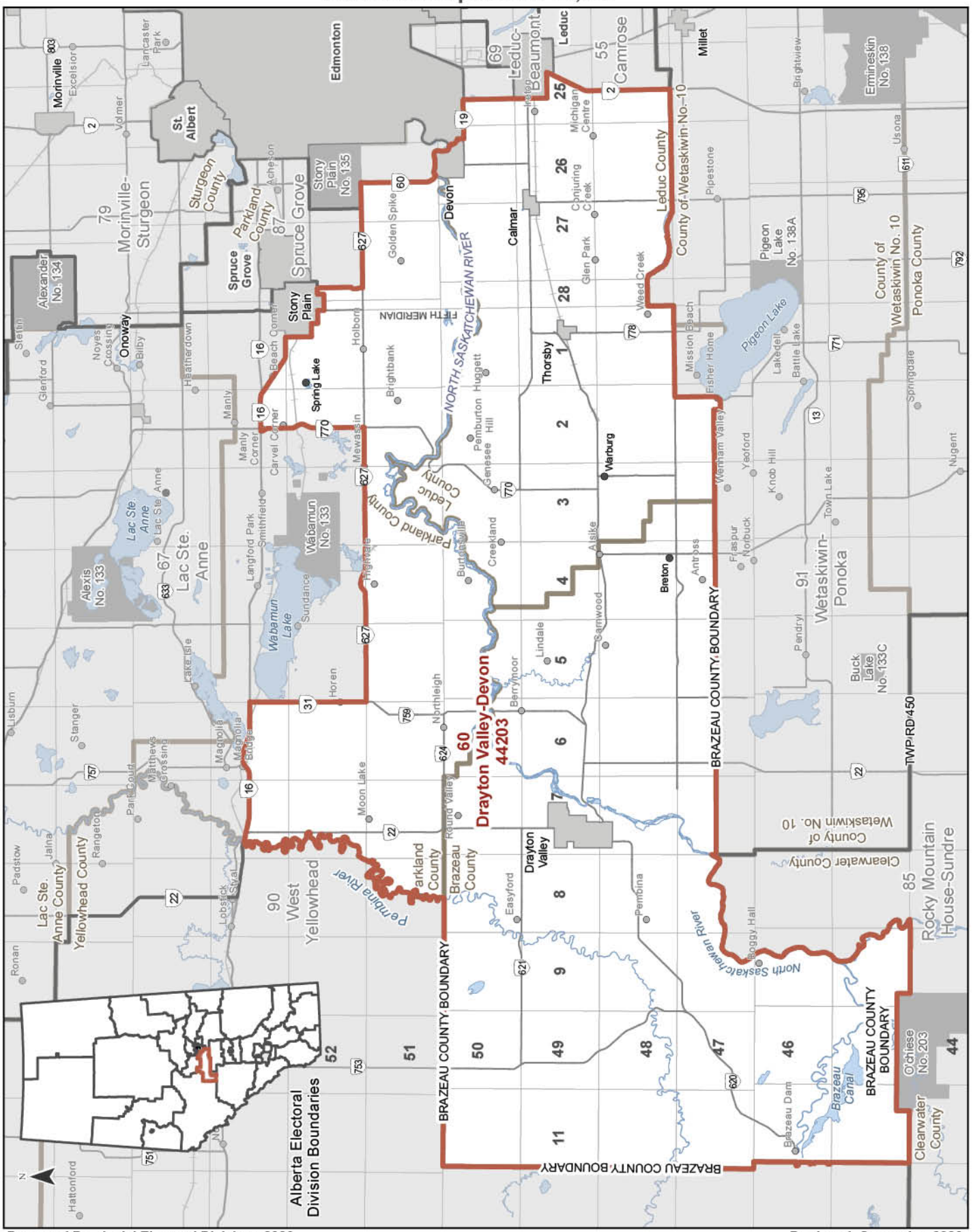
Estimated Population: 55,809



Proposed Provincial Electoral Divisions 2026

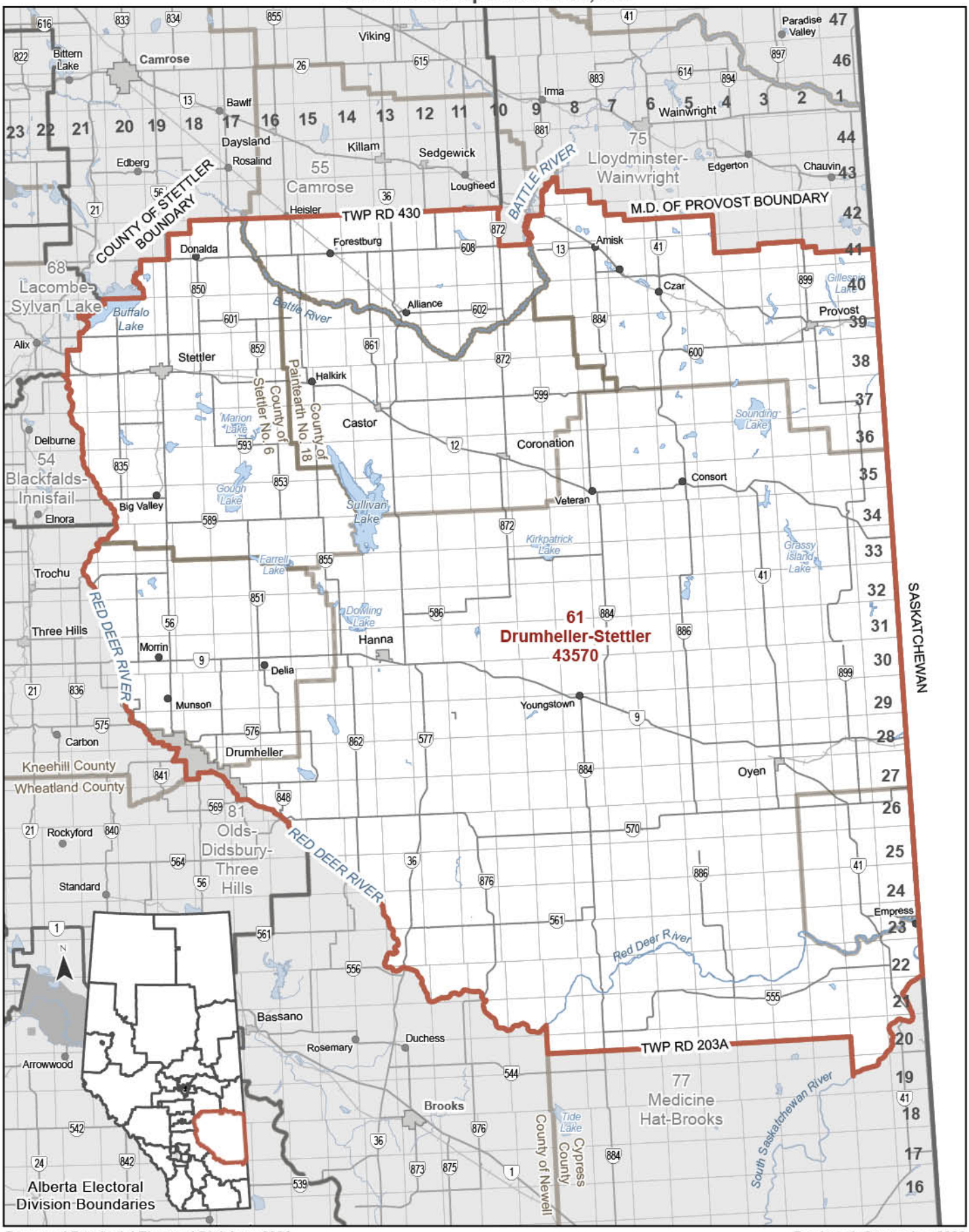
Produced: September 2026

Drayton Valley-Devon
Estimated Population: 44,203



Drumheller-Stettler

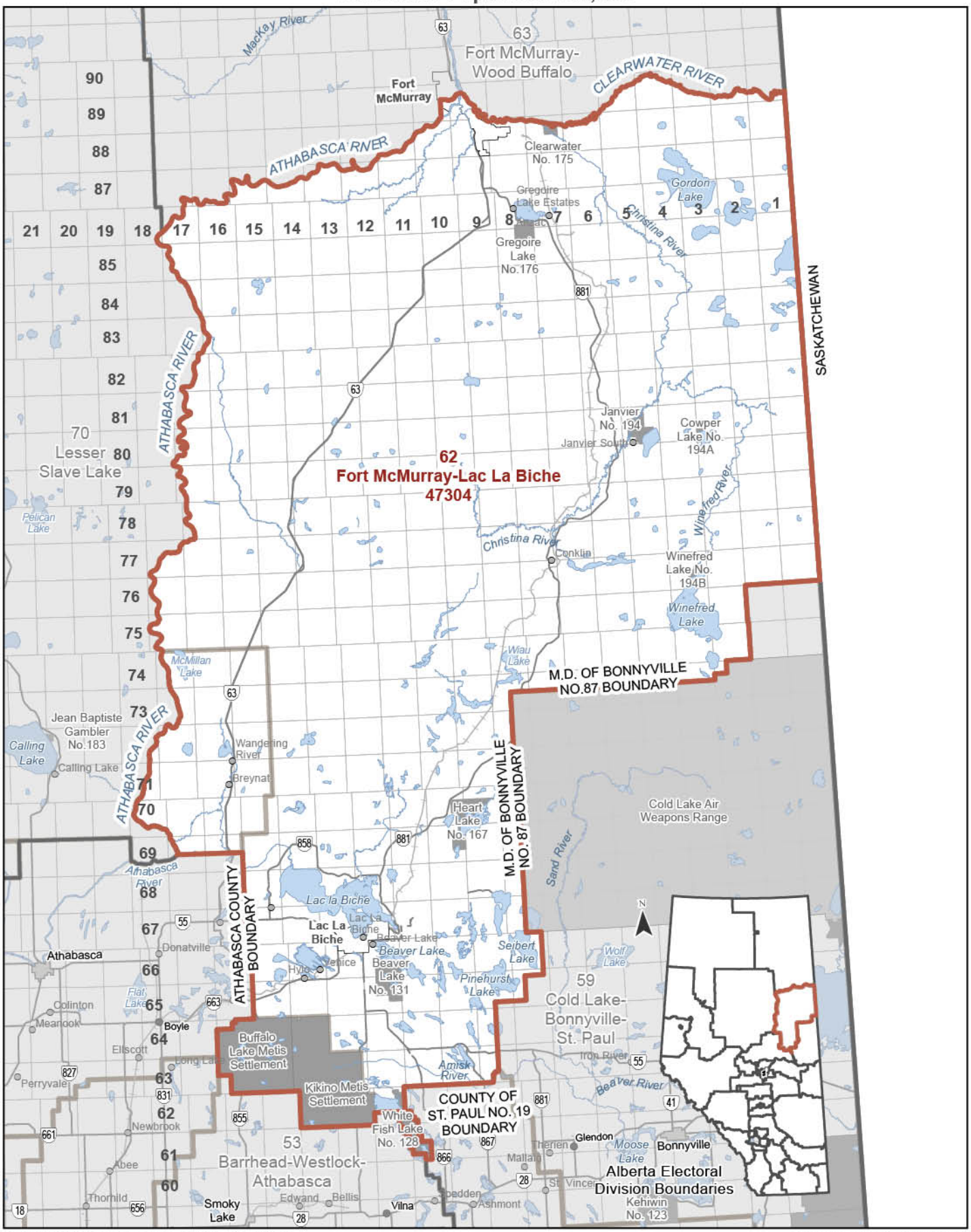
Estimated Population: 43,570



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Fort McMurray-Lac La Biche
Estimated Population: 47,304

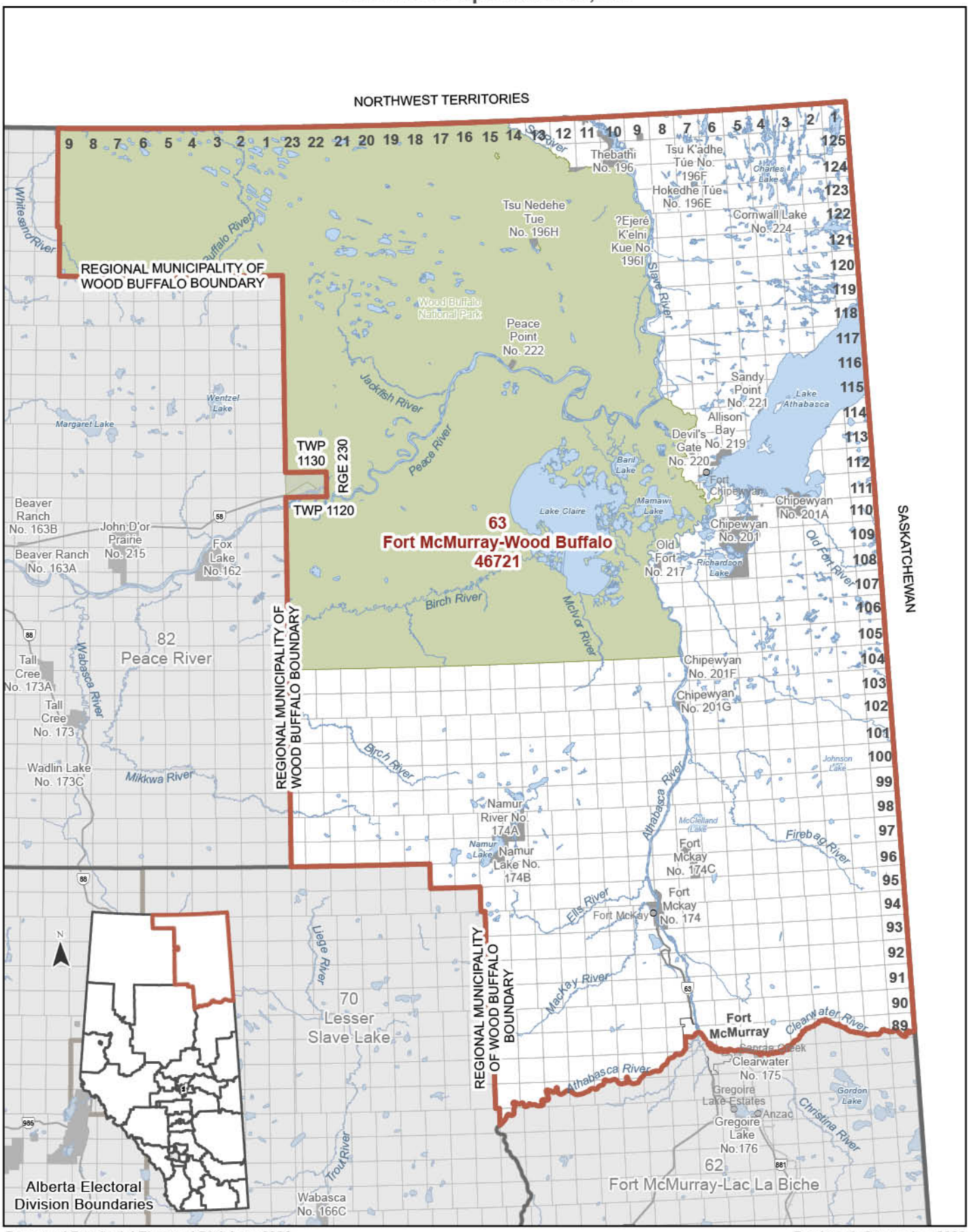


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Fort McMurray-Wood Buffalo

Estimated Population: 46,721

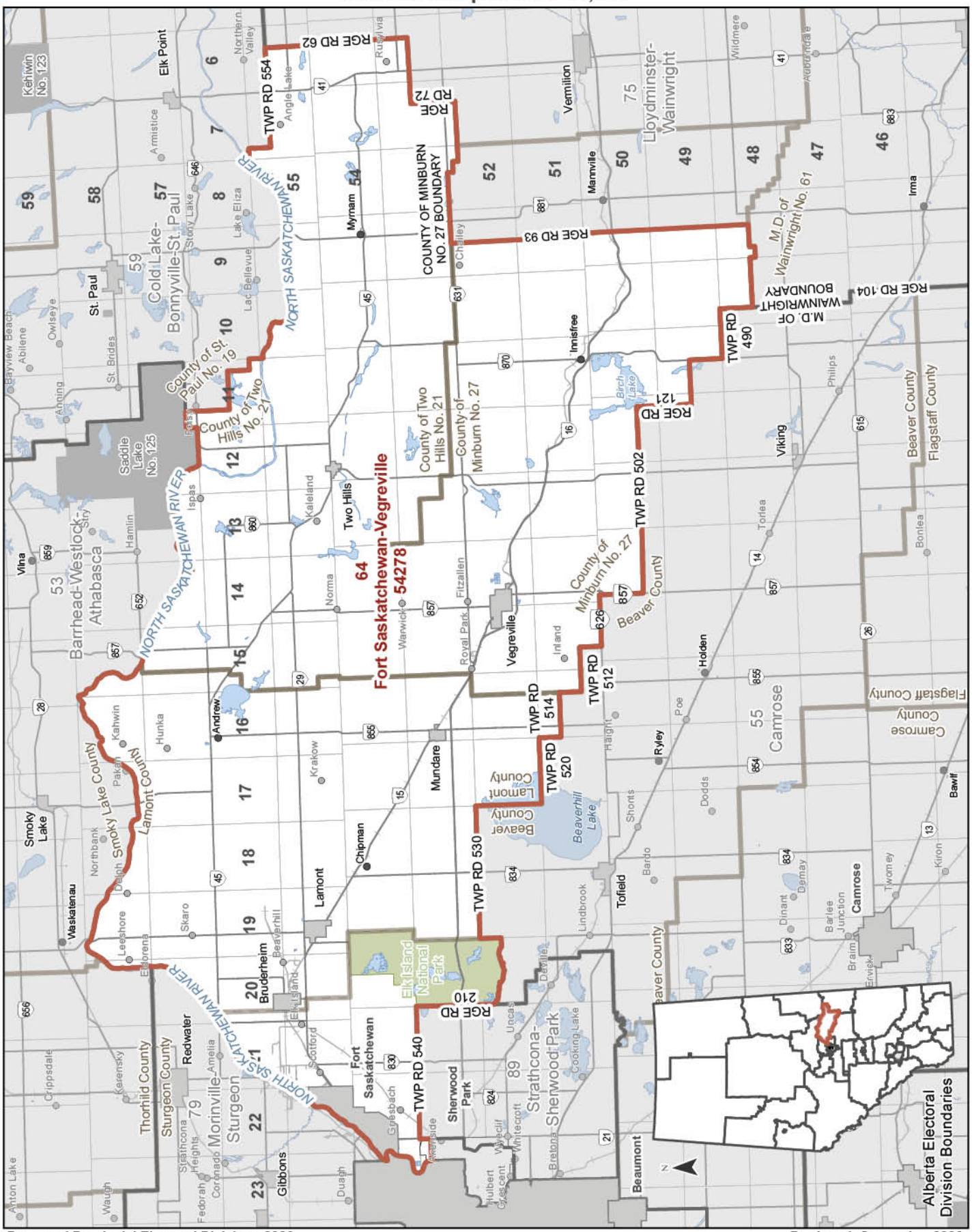


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Fort Saskatchewan-Vegreville

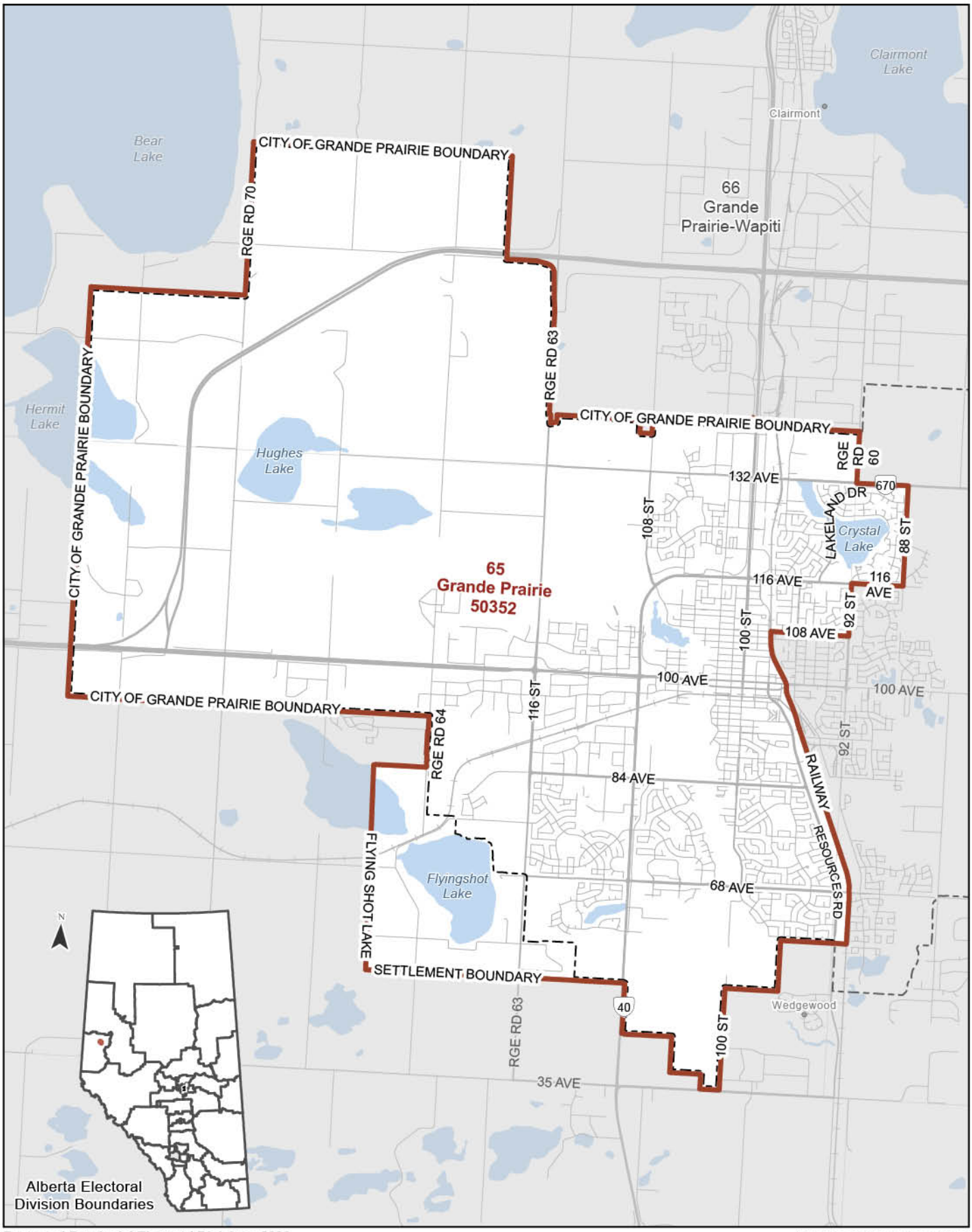
Estimated Population: 54,278



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

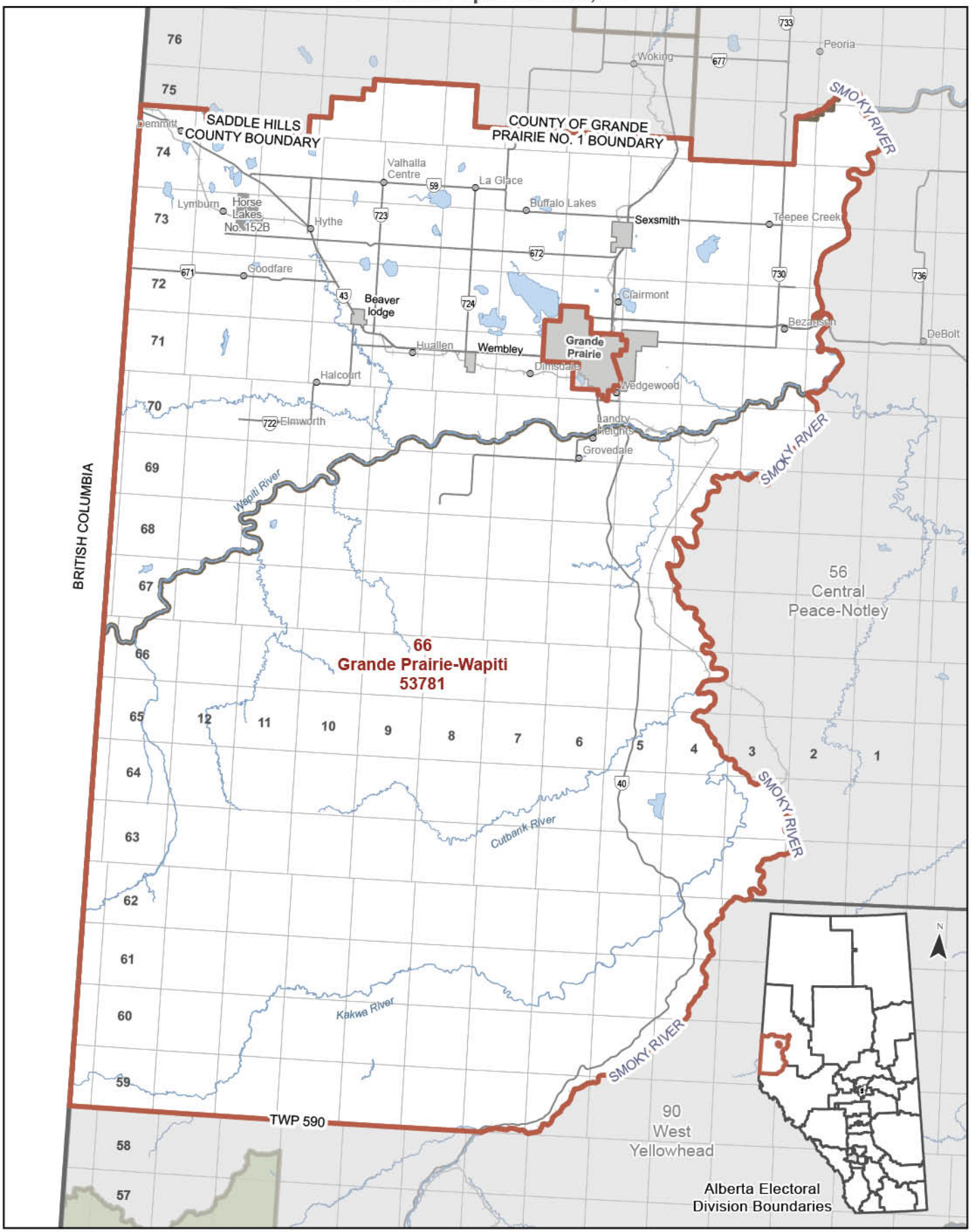
Grande Prairie
Estimated Population: 50,352



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Grande Prairie-Wapiti
Estimated Population: 53,781

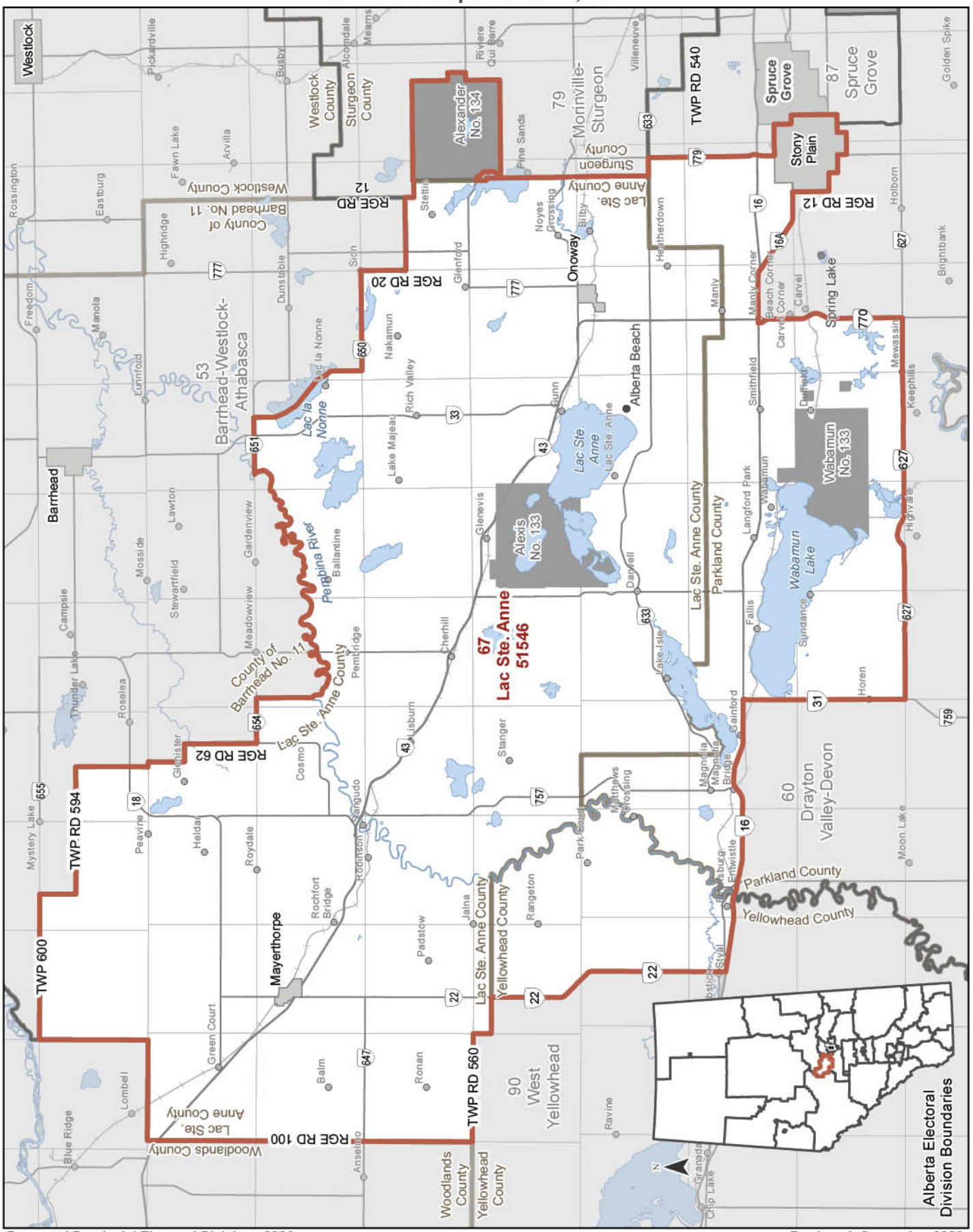


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Lac Ste. Anne

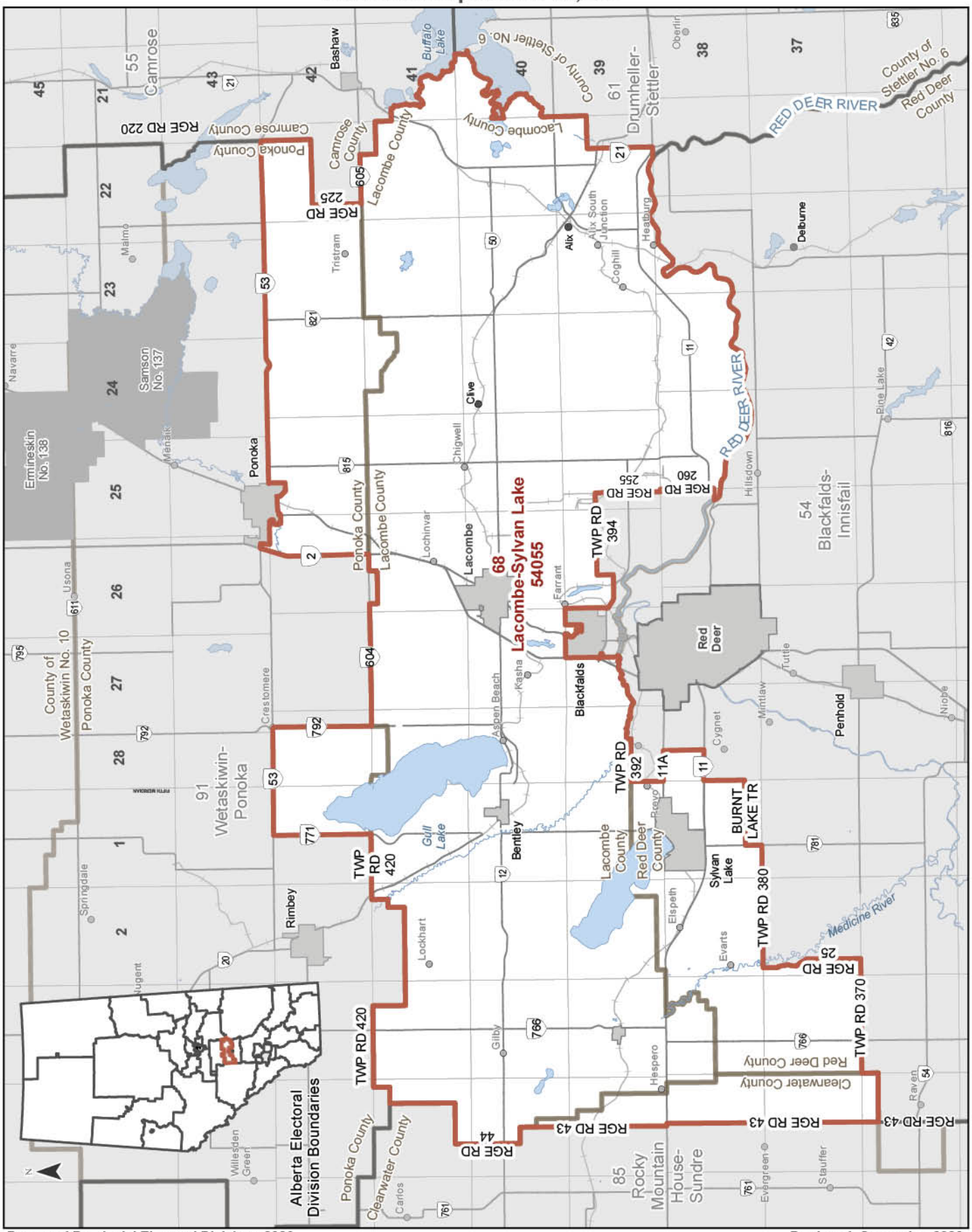
Estimated Population: 51,546



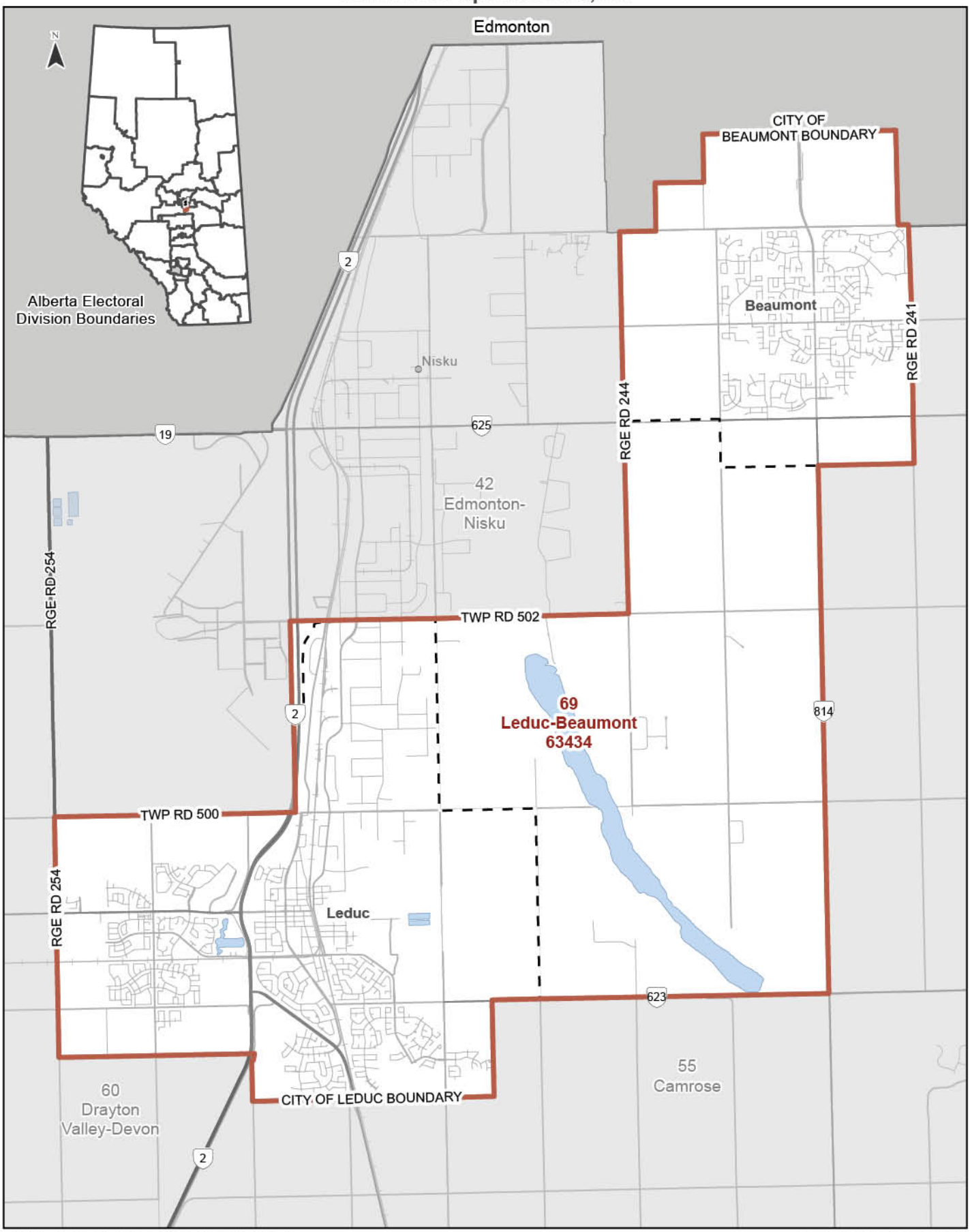
Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Lacombe-Sylvan Lake
Estimated Population: 54,055



Leduc-Beaumont
Estimated Population: 63,434

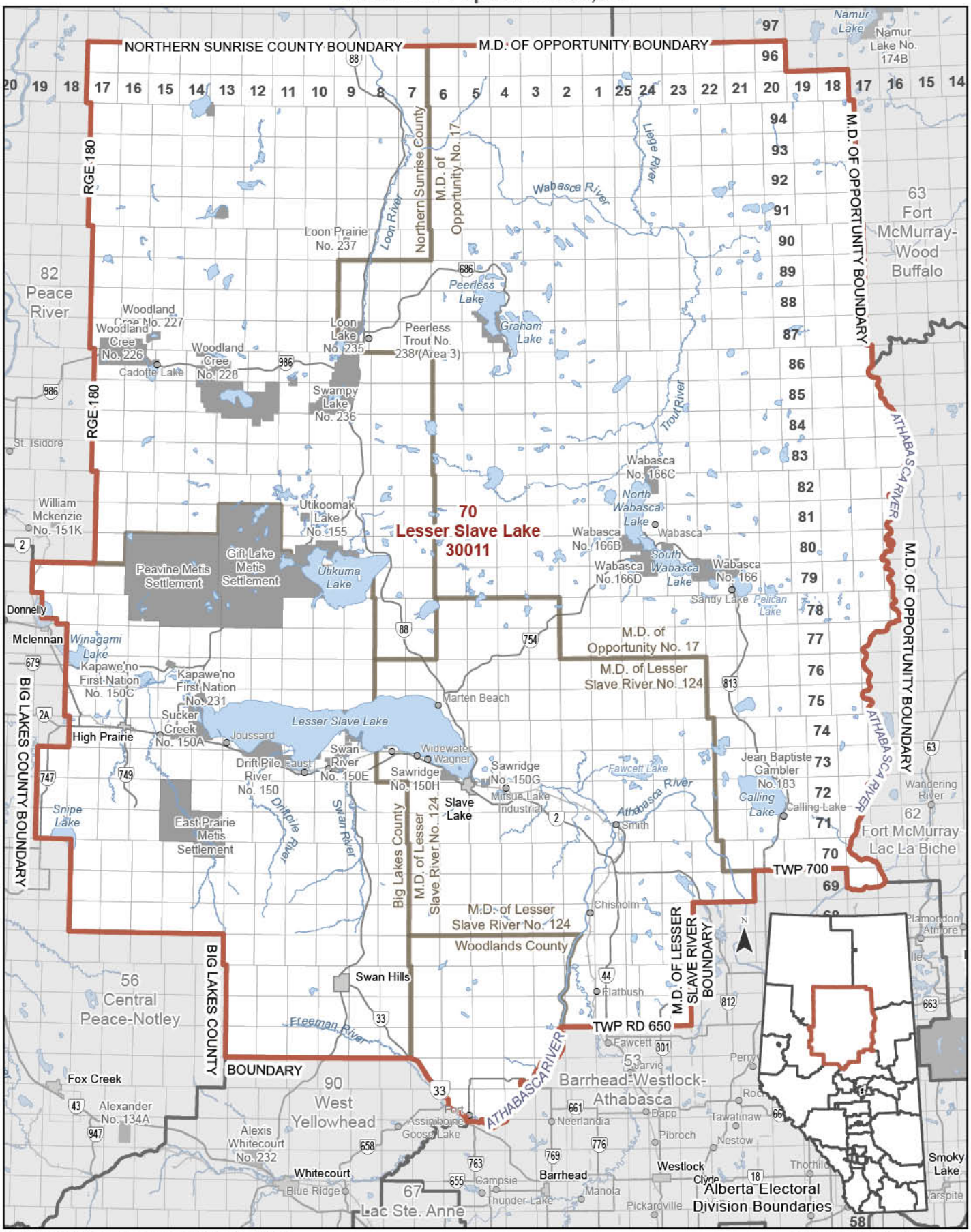


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Lesser Slave Lake

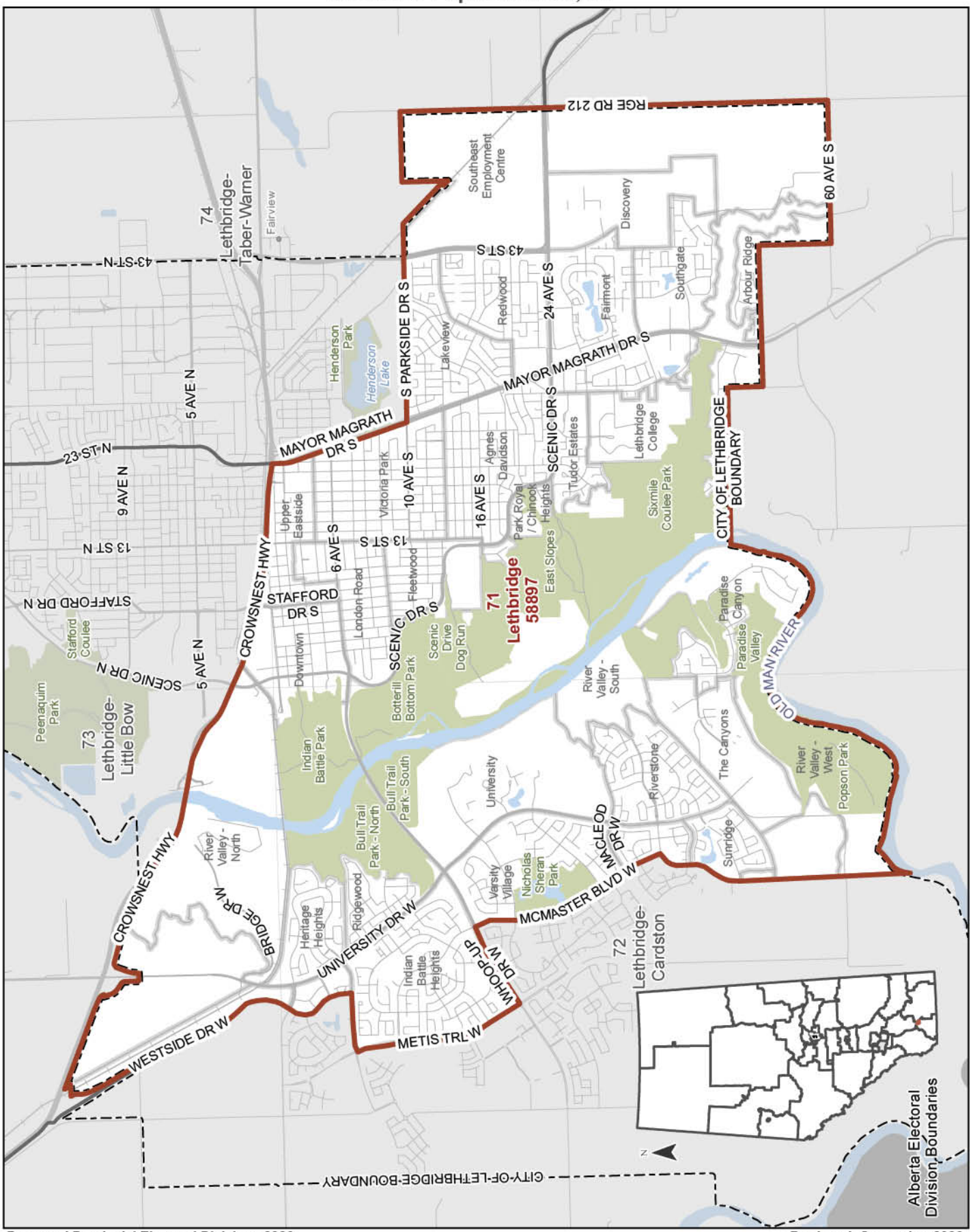
Estimated Population: 30,011



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

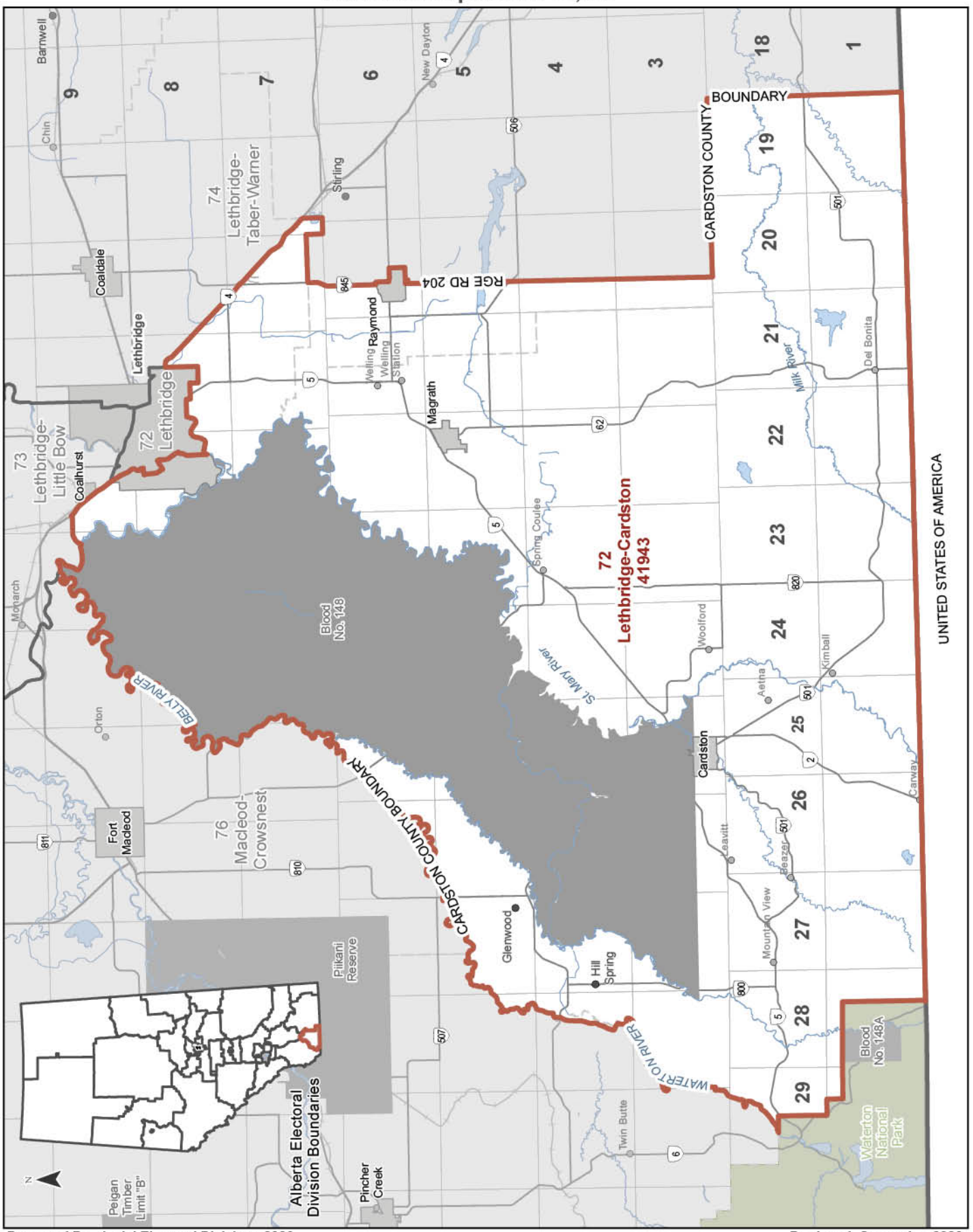
Lethbridge
Estimated Population: 58,897



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

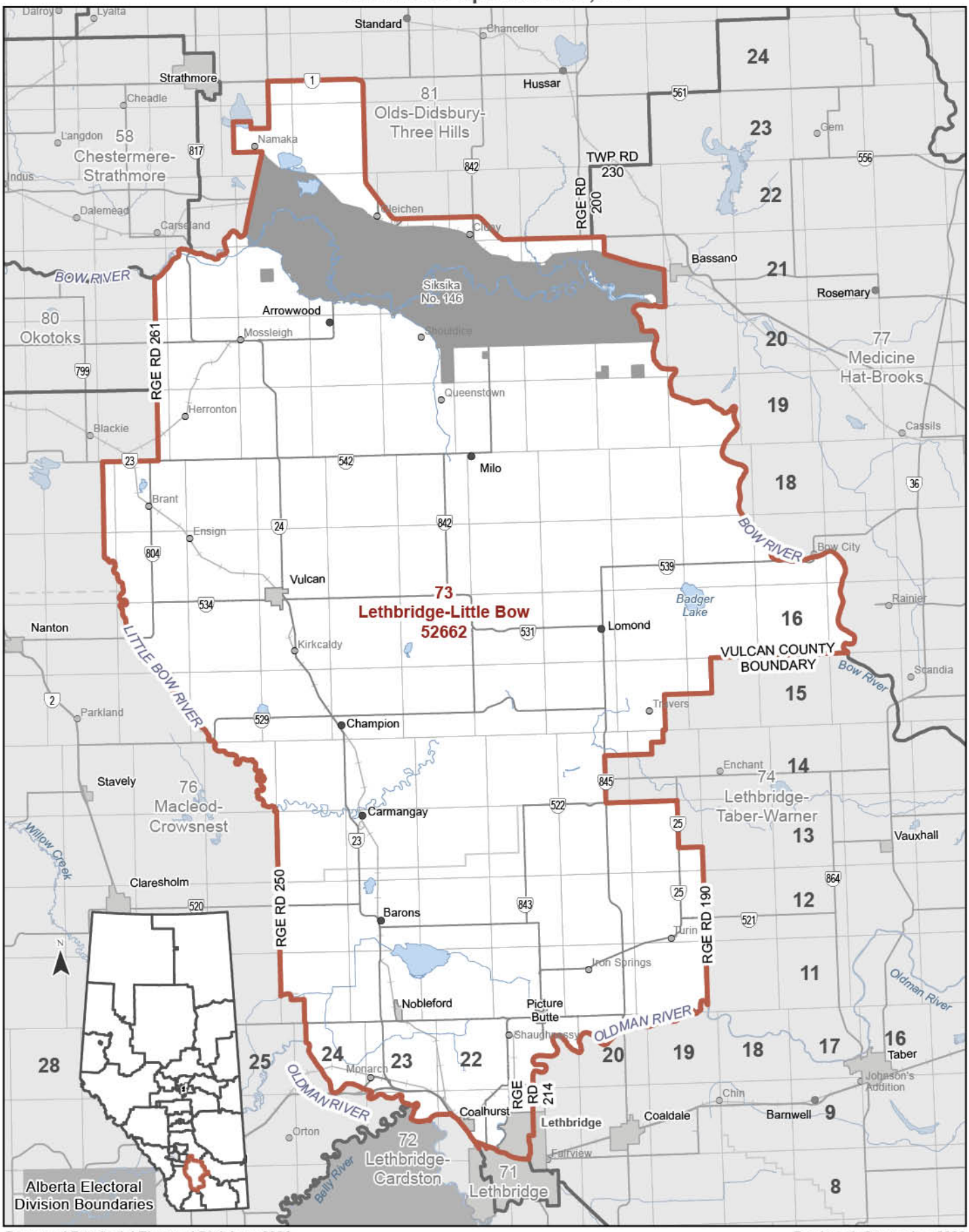
Lethbridge-Cardston
Estimated Population: 41,943



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

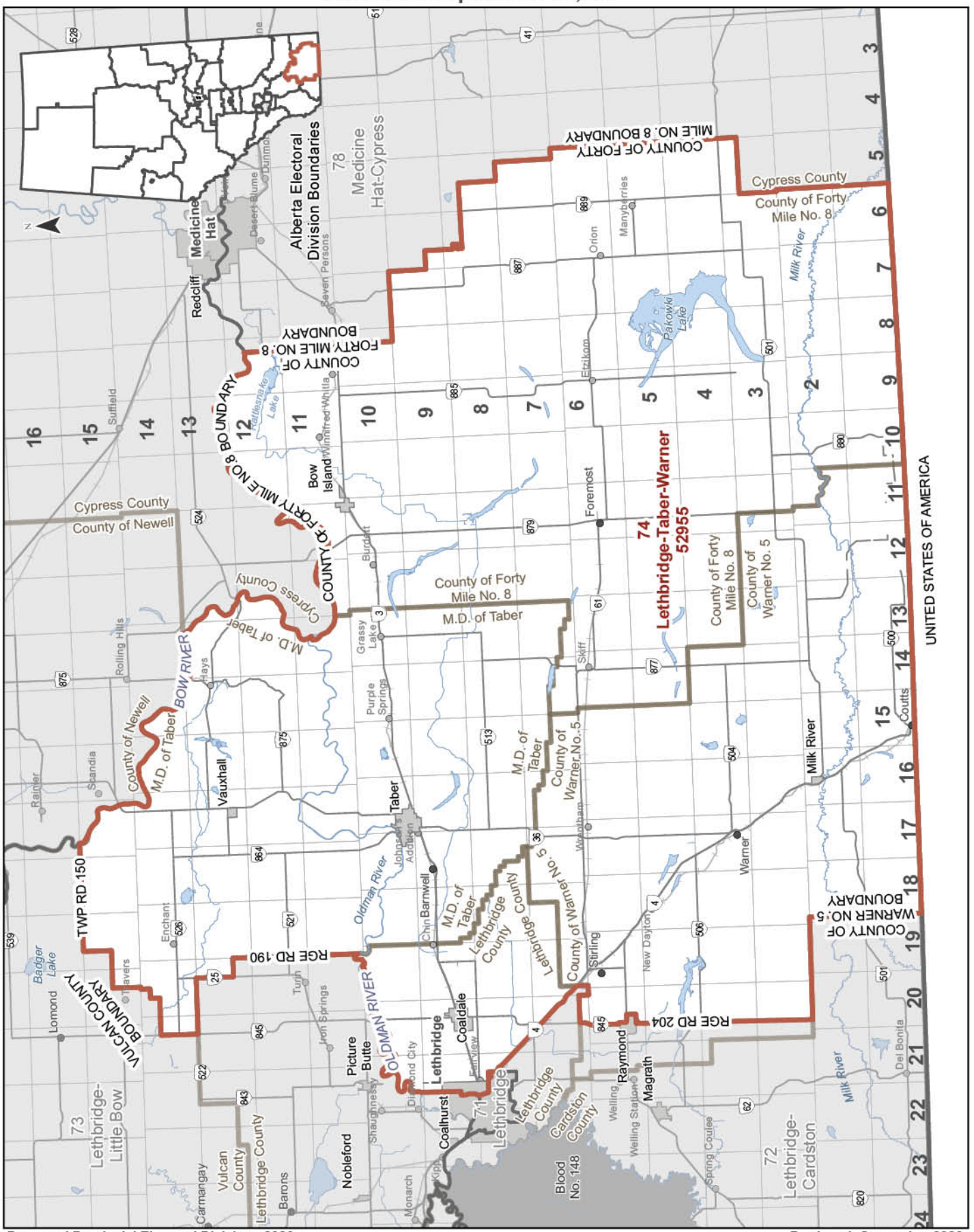
Lethbridge-Little Bow
Estimated Population: 52,662



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Lethbridge-Taber-Warner
Estimated Population: 52,955

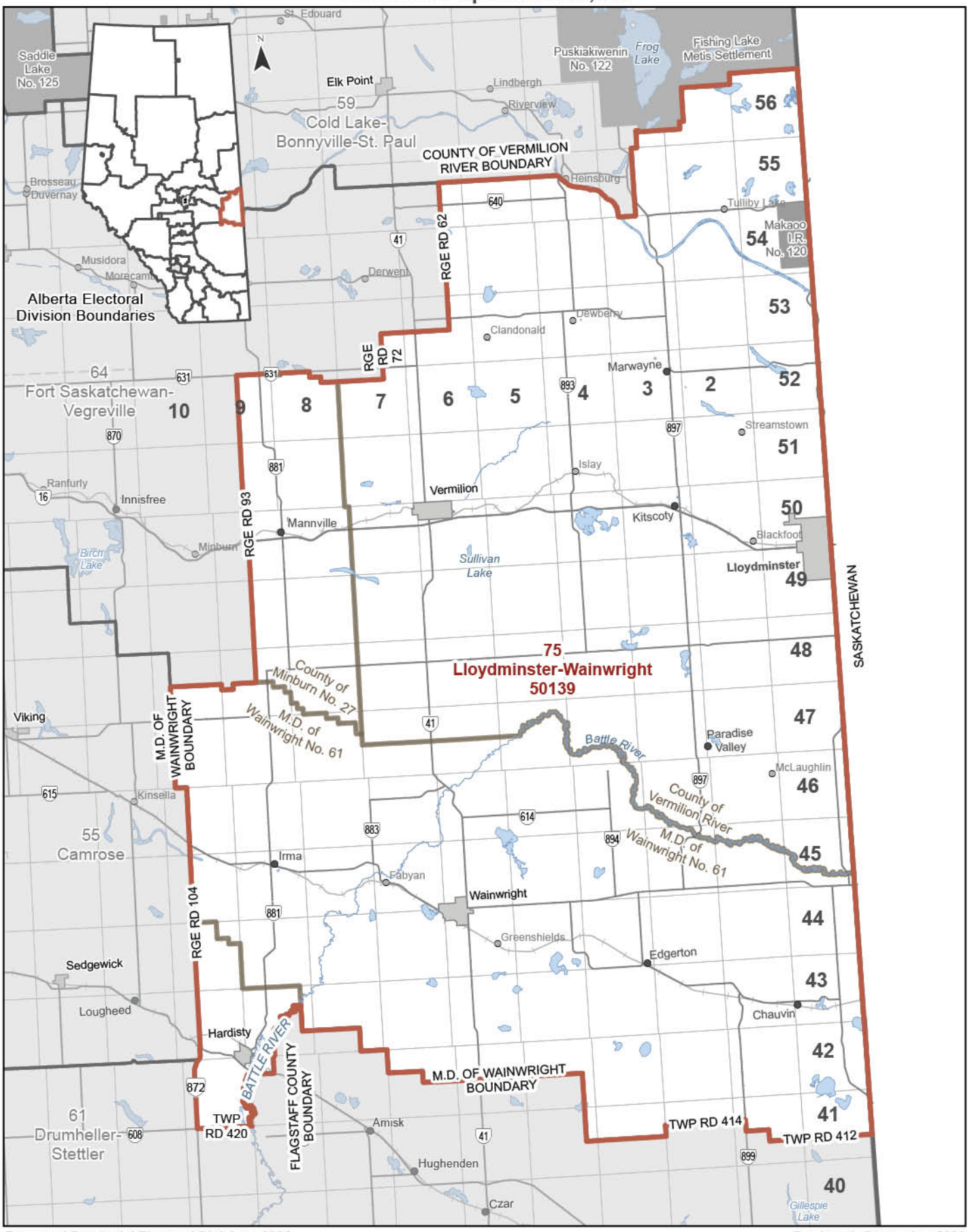


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Lloydminster-Wainwright

Estimated Population: 50,139

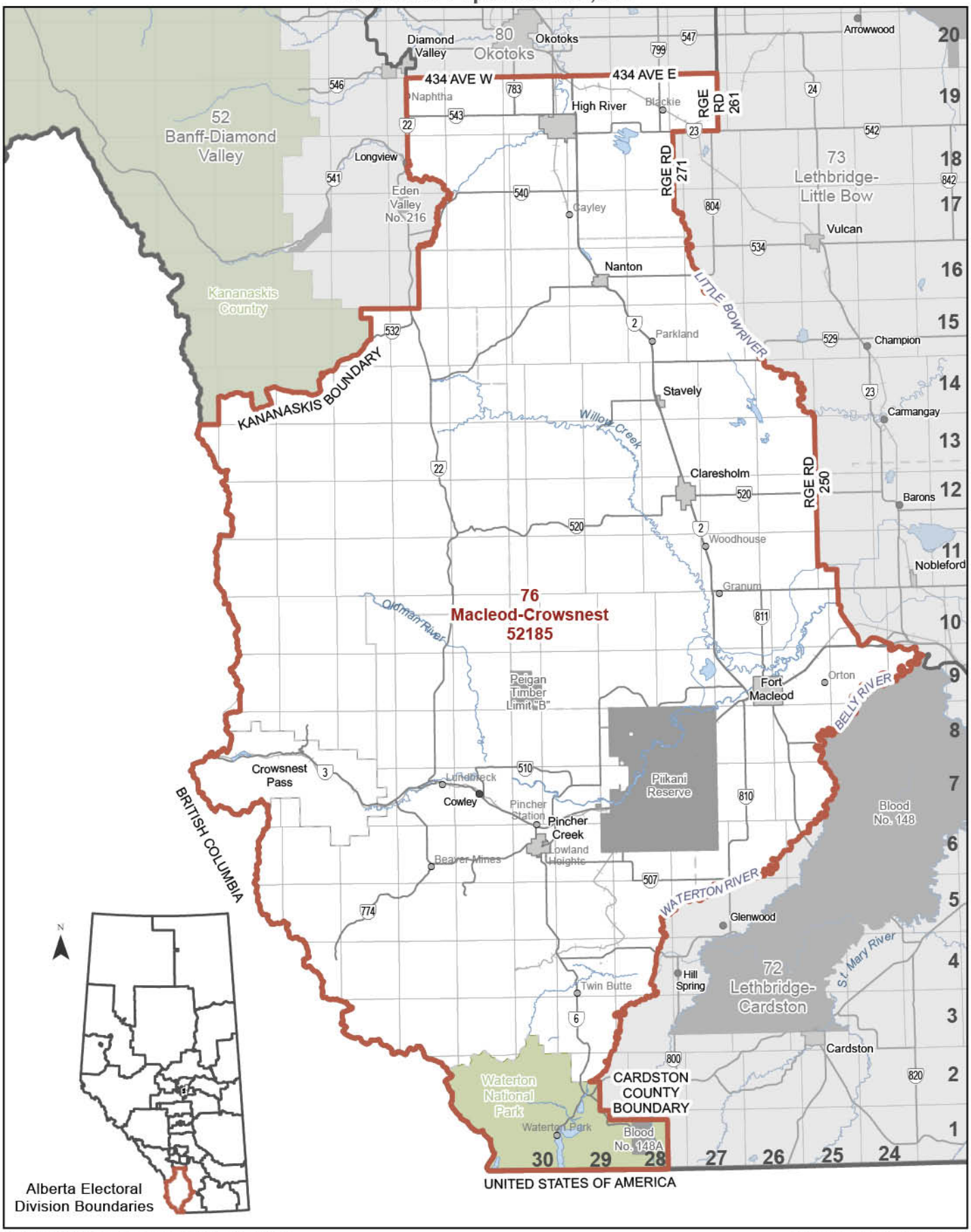


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Macleod-Crowsnest

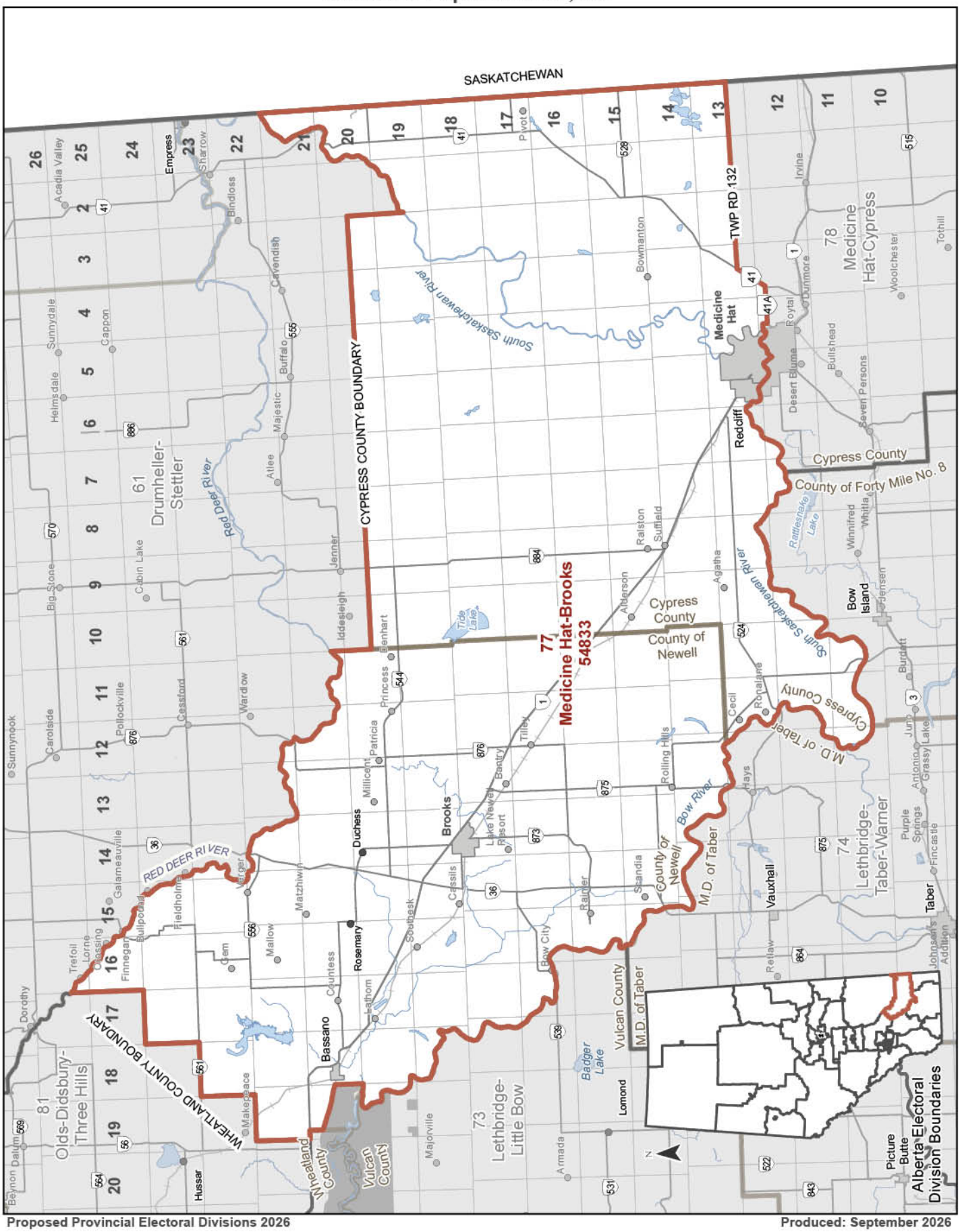
Estimated Population: 52,185



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

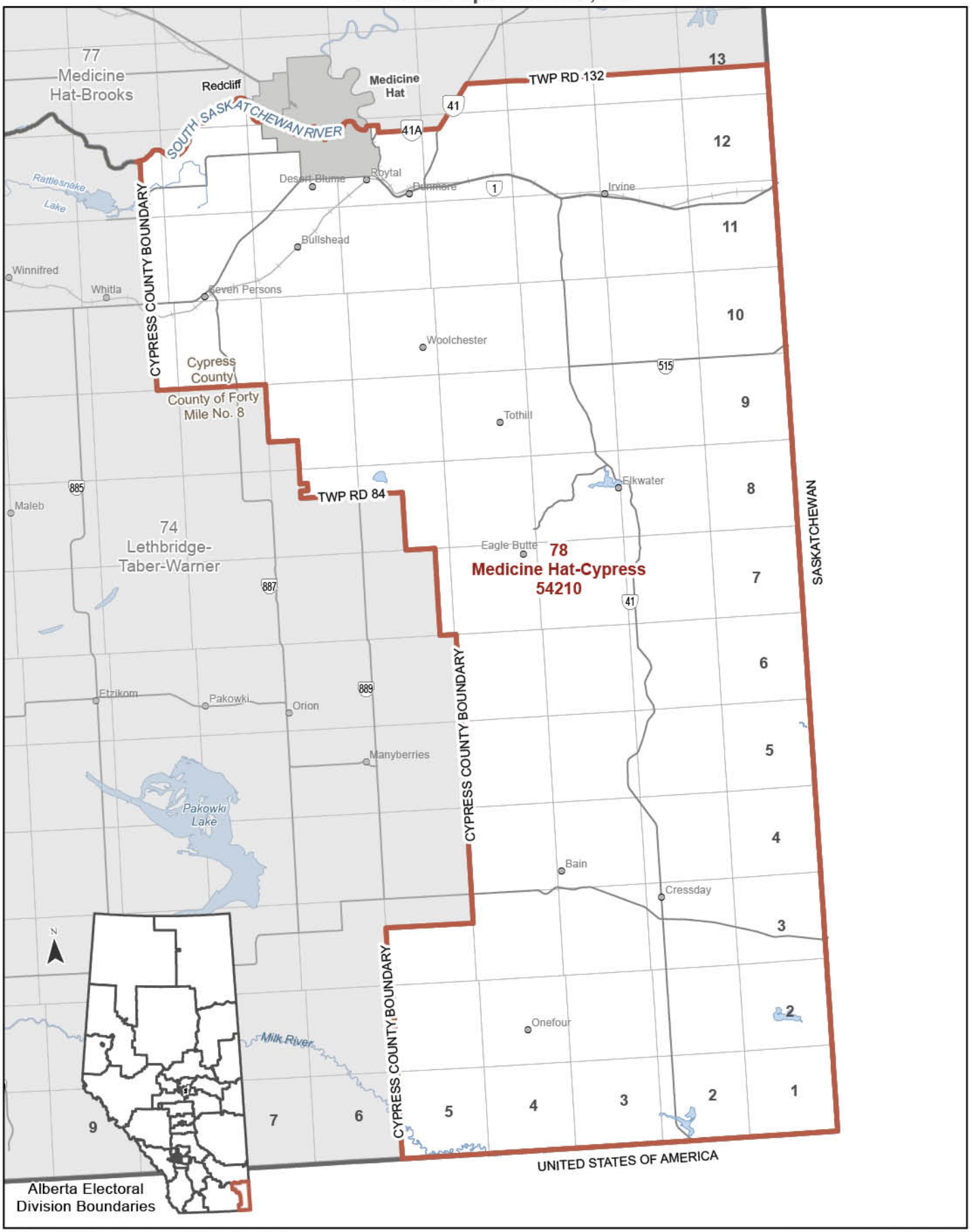
Medicine Hat-Brooks
Estimated Population: 54,833



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

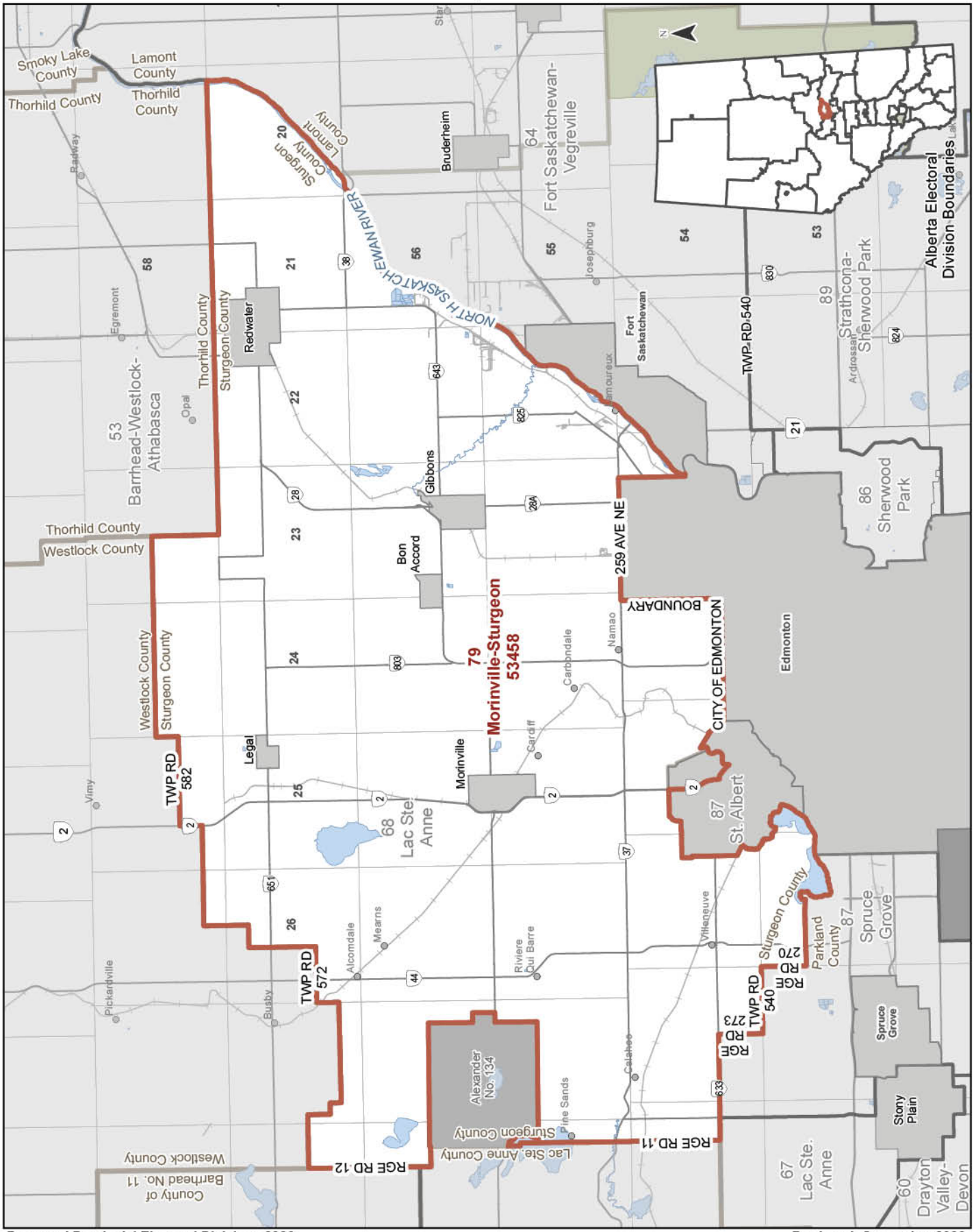
Medicine Hat-Cypress
Estimated Population: 54,210



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Morinville-Sturgeon
Estimated Population: 53,458

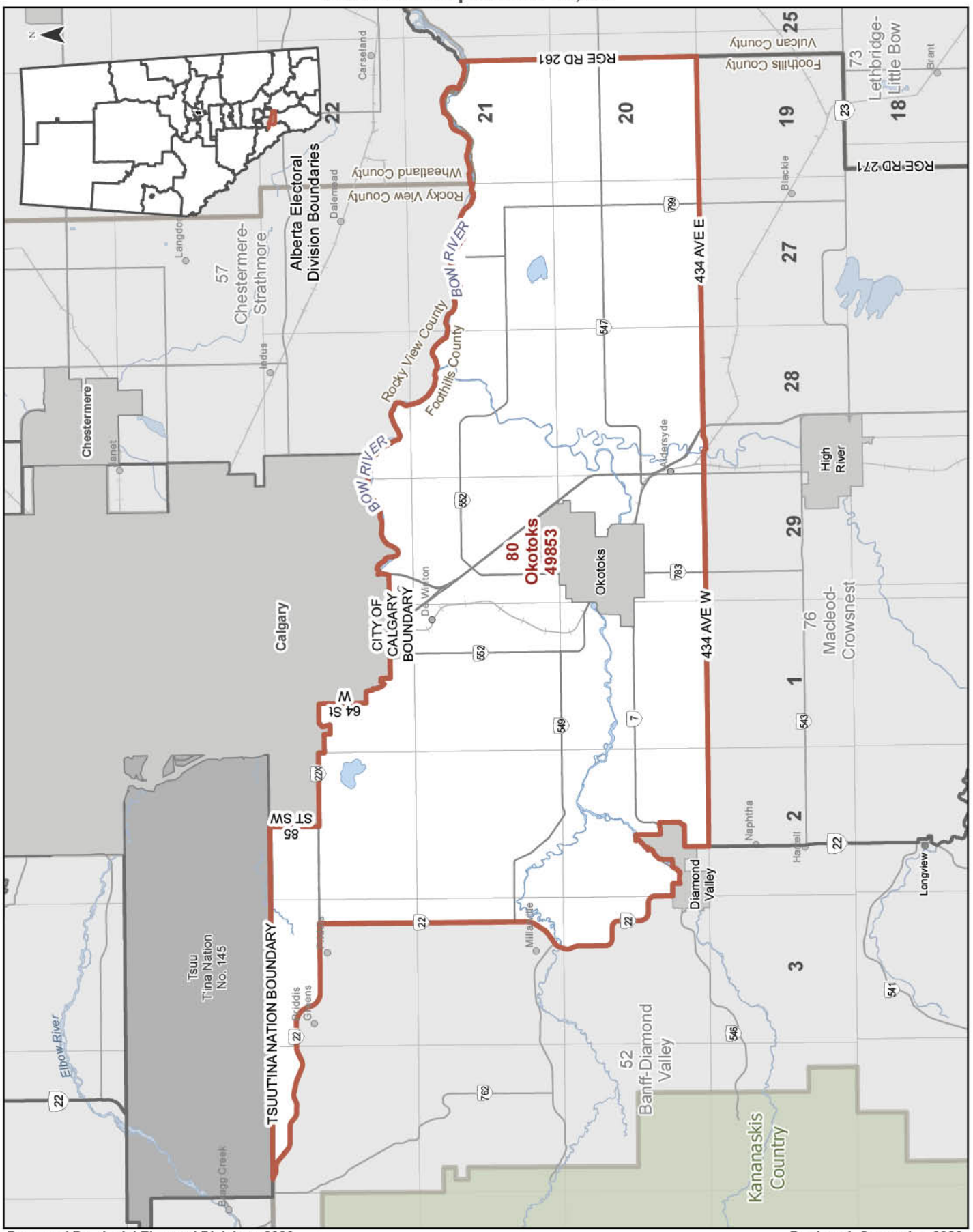


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Okotoks

Estimated Population: 49,853

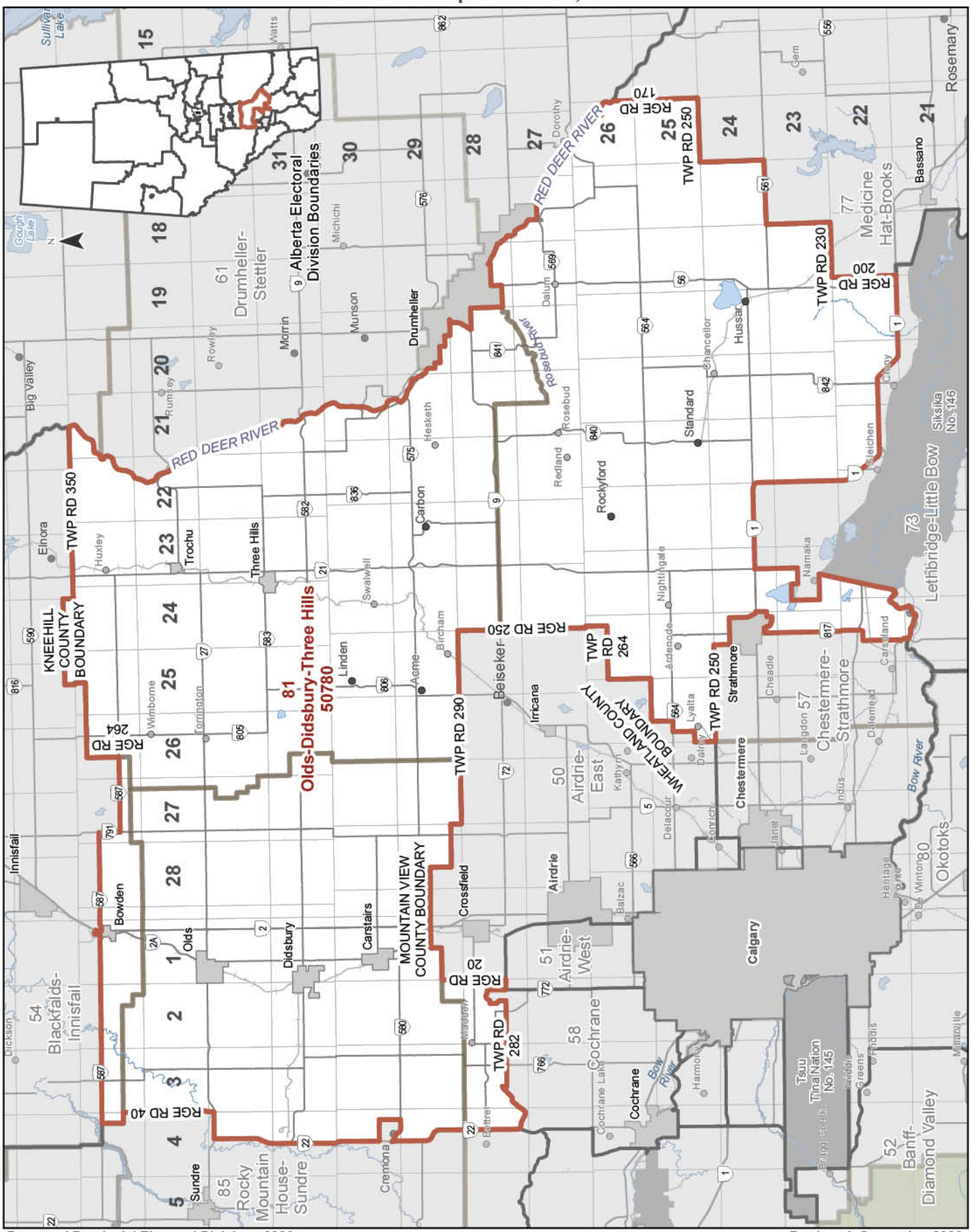


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Olds-Didsbury-Three Hills

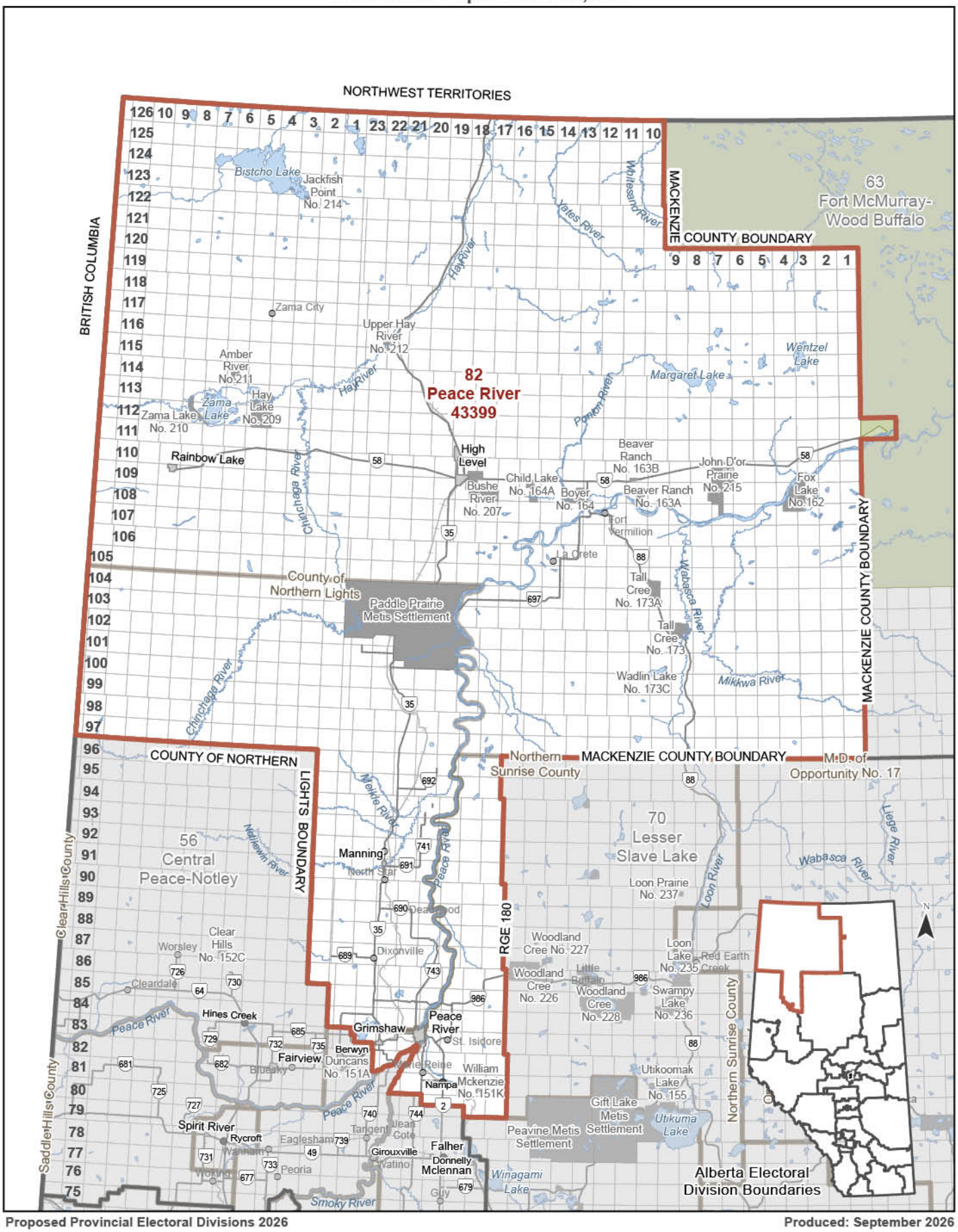
Estimated Population: 50,780



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

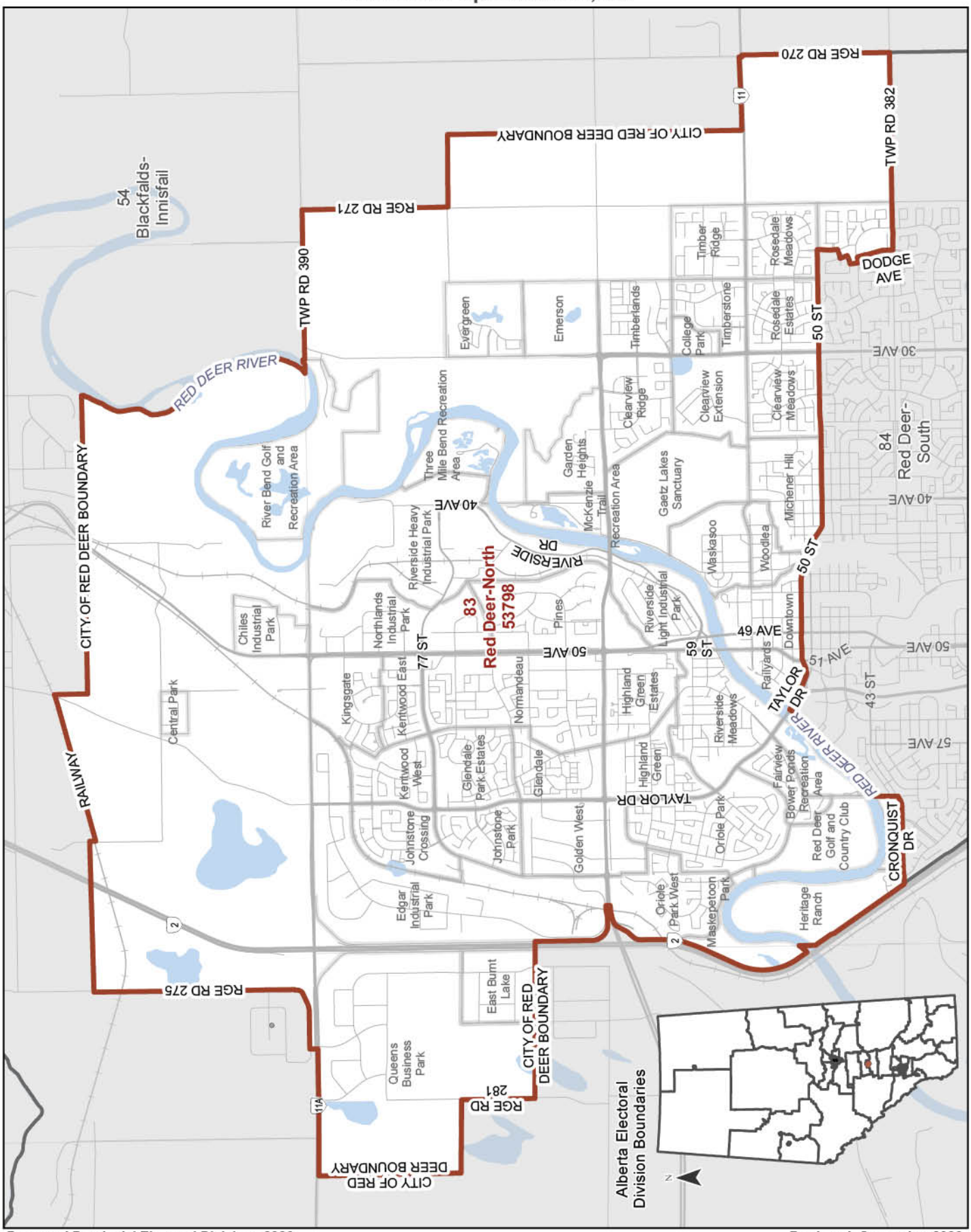
Peace River
Estimated Population: 43,399



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

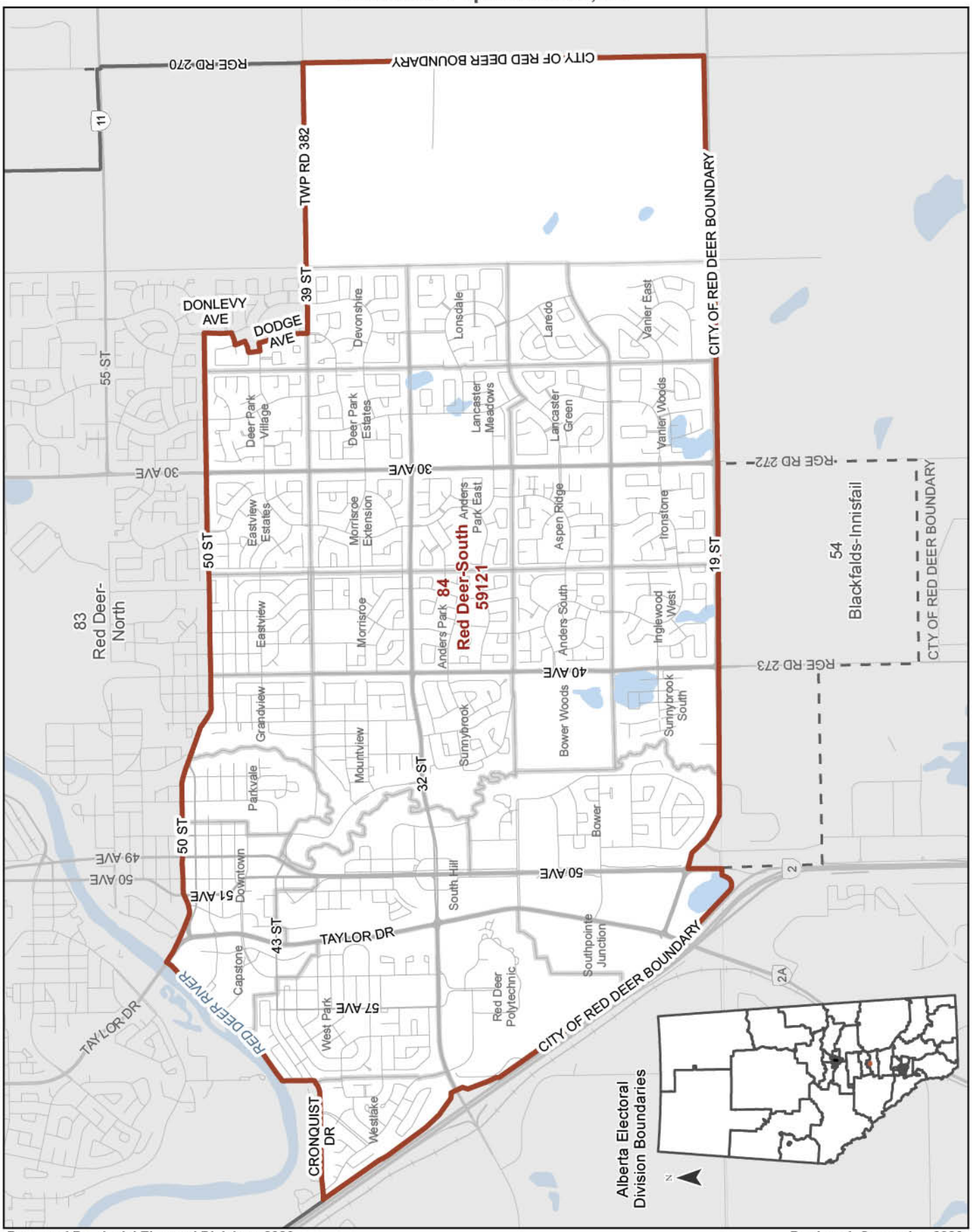
Red Deer-North
Estimated Population: 53,798



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Red Deer-South
Estimated Population: 59,121

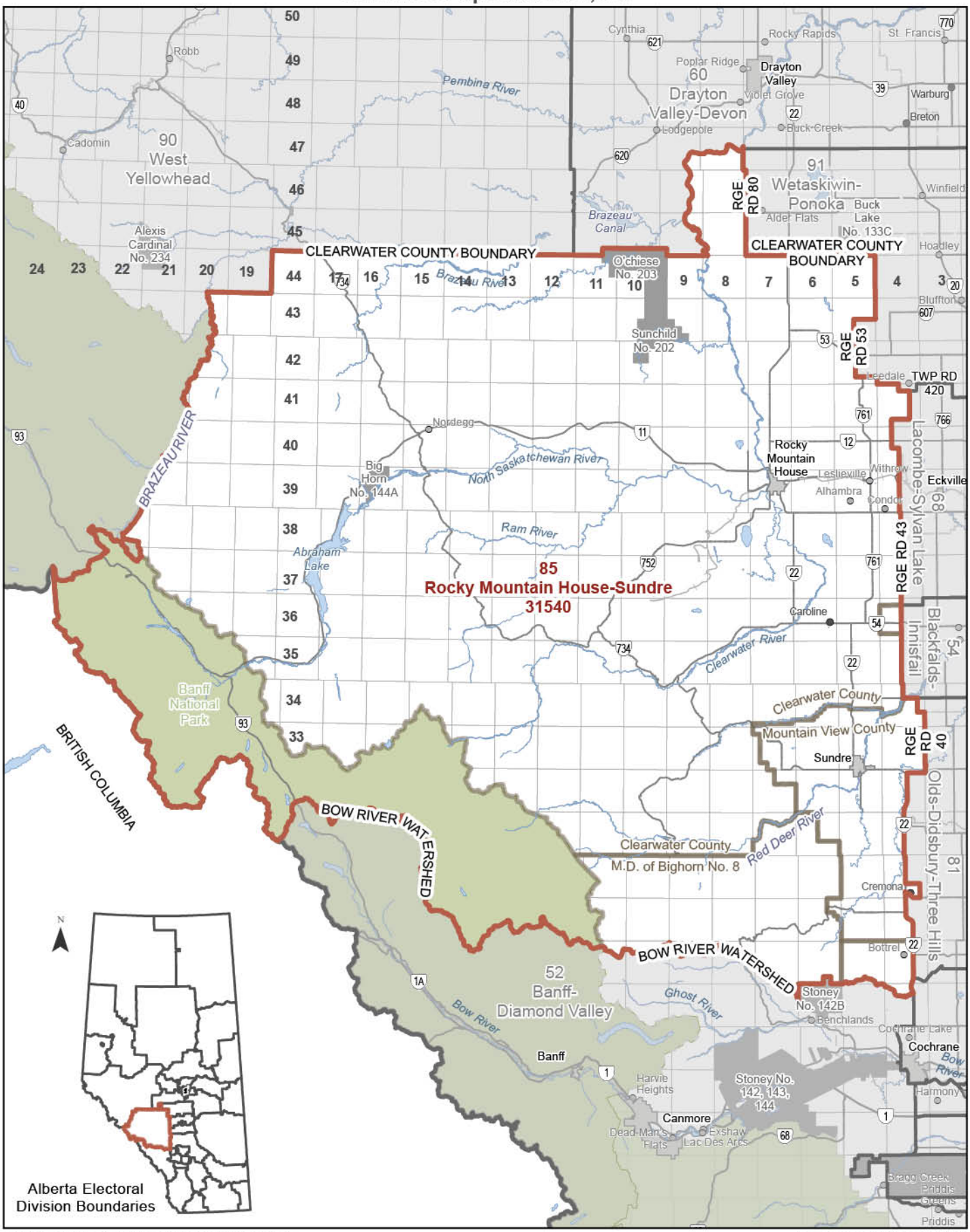


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Rocky Mountain House-Sundre

Estimated Population: 31,540

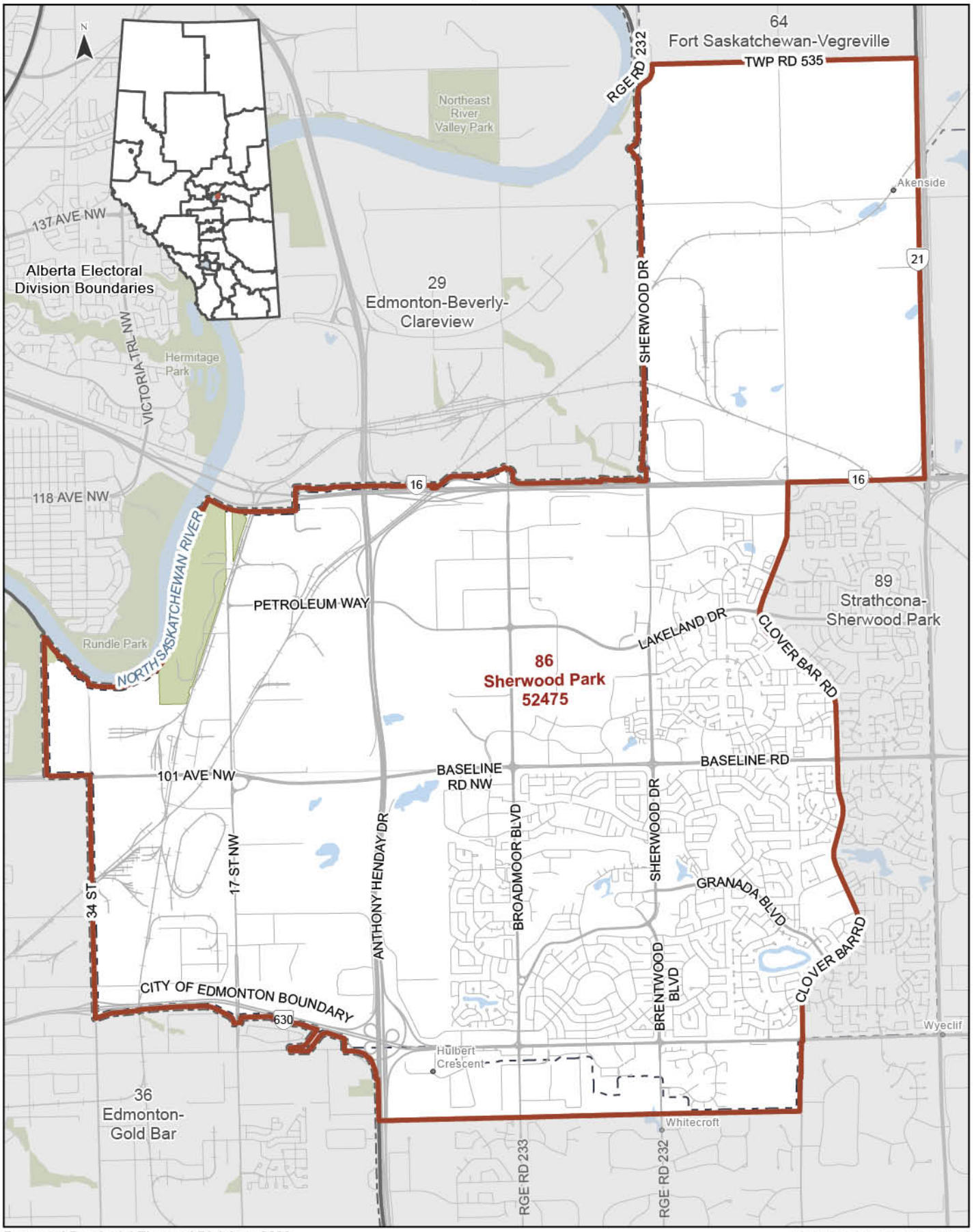


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Sherwood Park

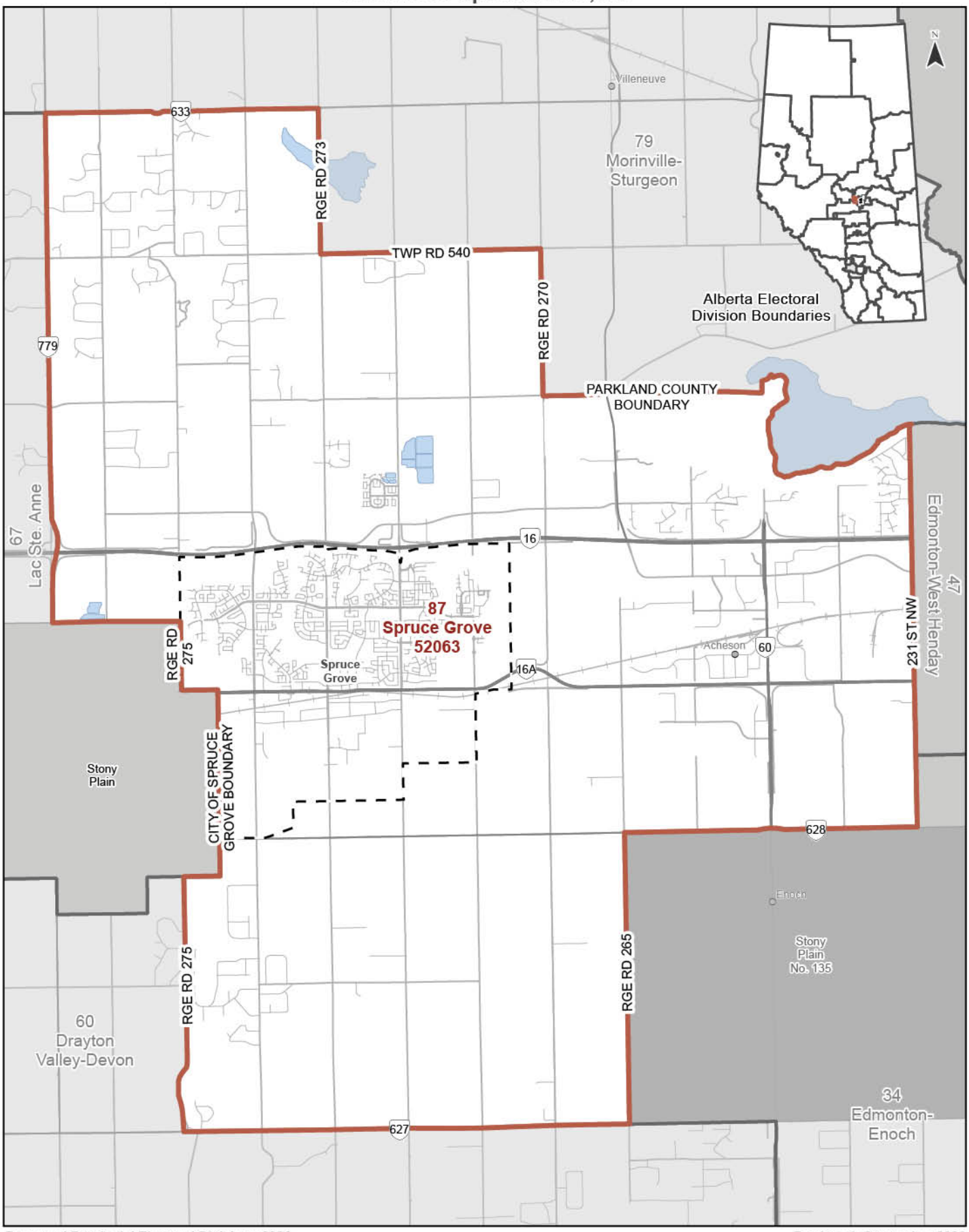
Estimated Population: 52,475



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Spruce Grove
Estimated Population: 52,063

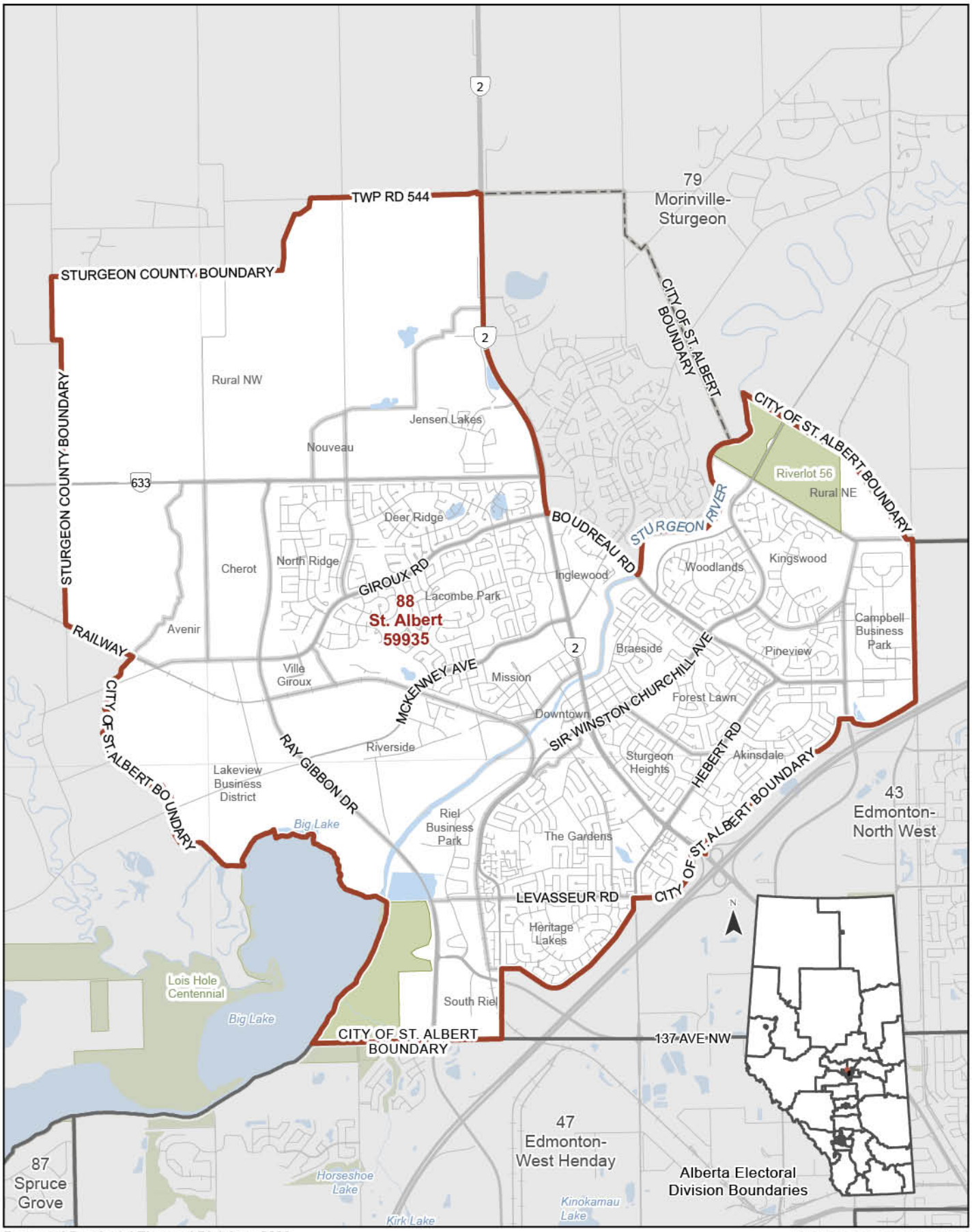


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

St. Albert

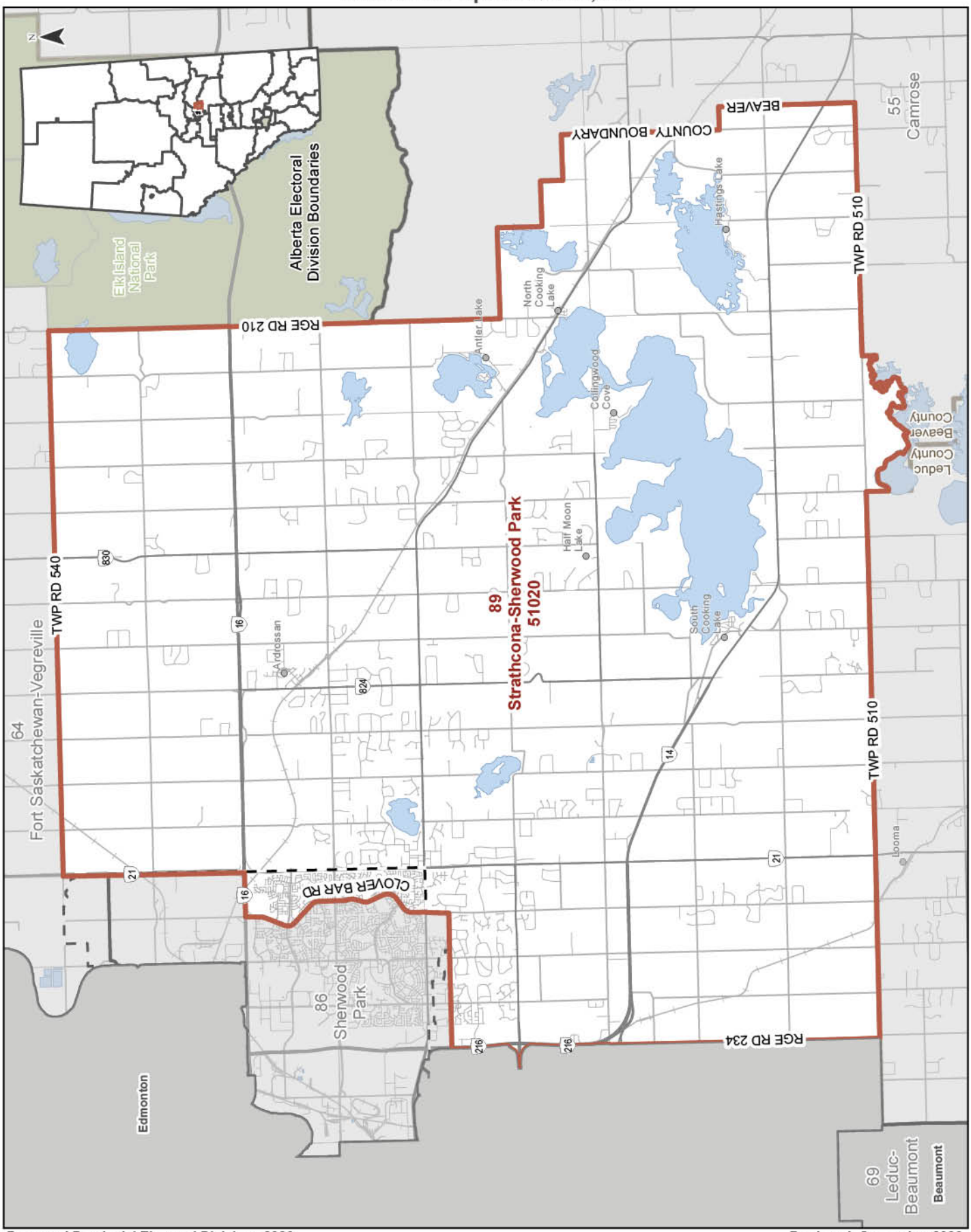
Estimated Population: 59,935



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Strathcona-Sherwood Park
Estimated Population: 51,020

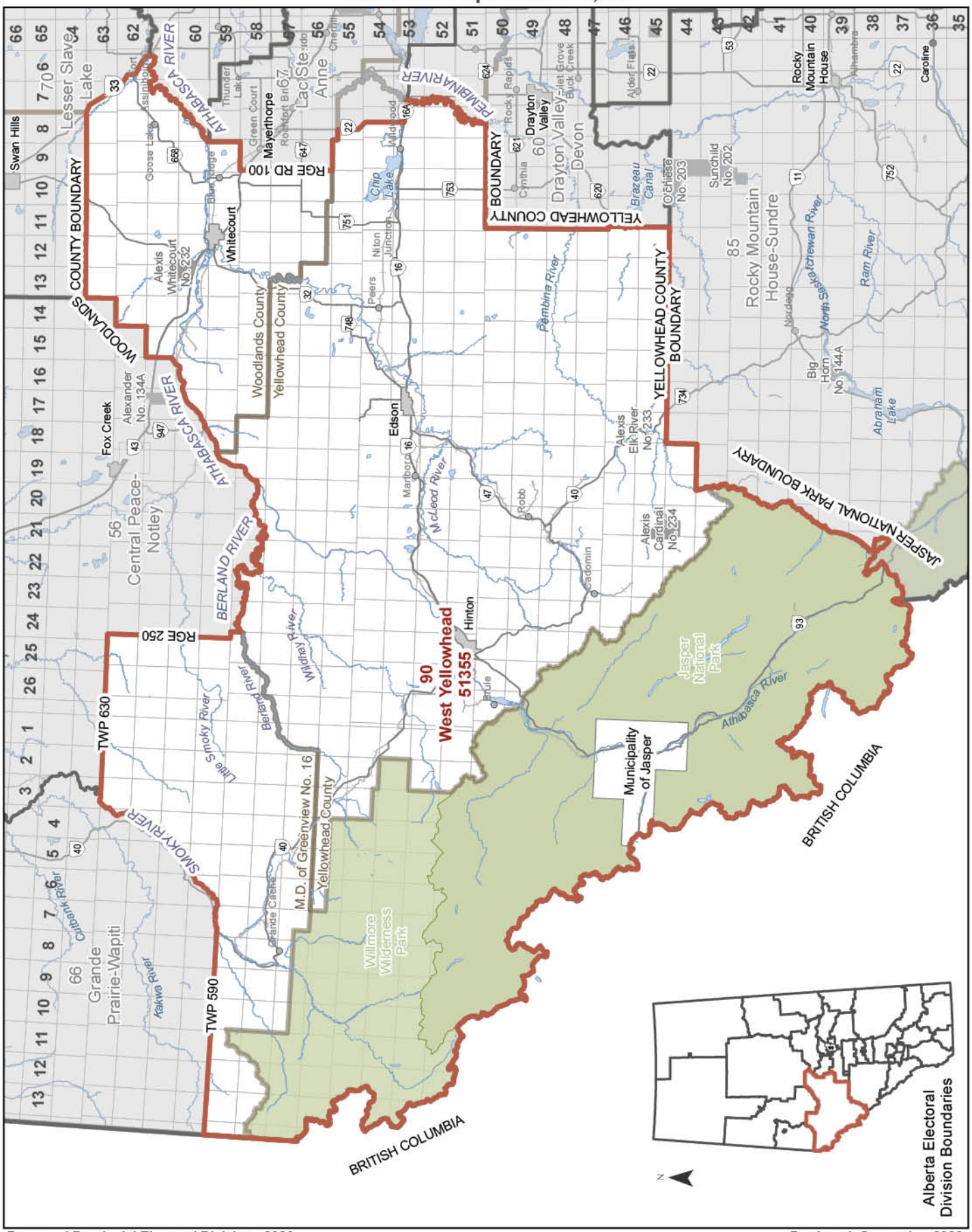


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

West Yellowhead

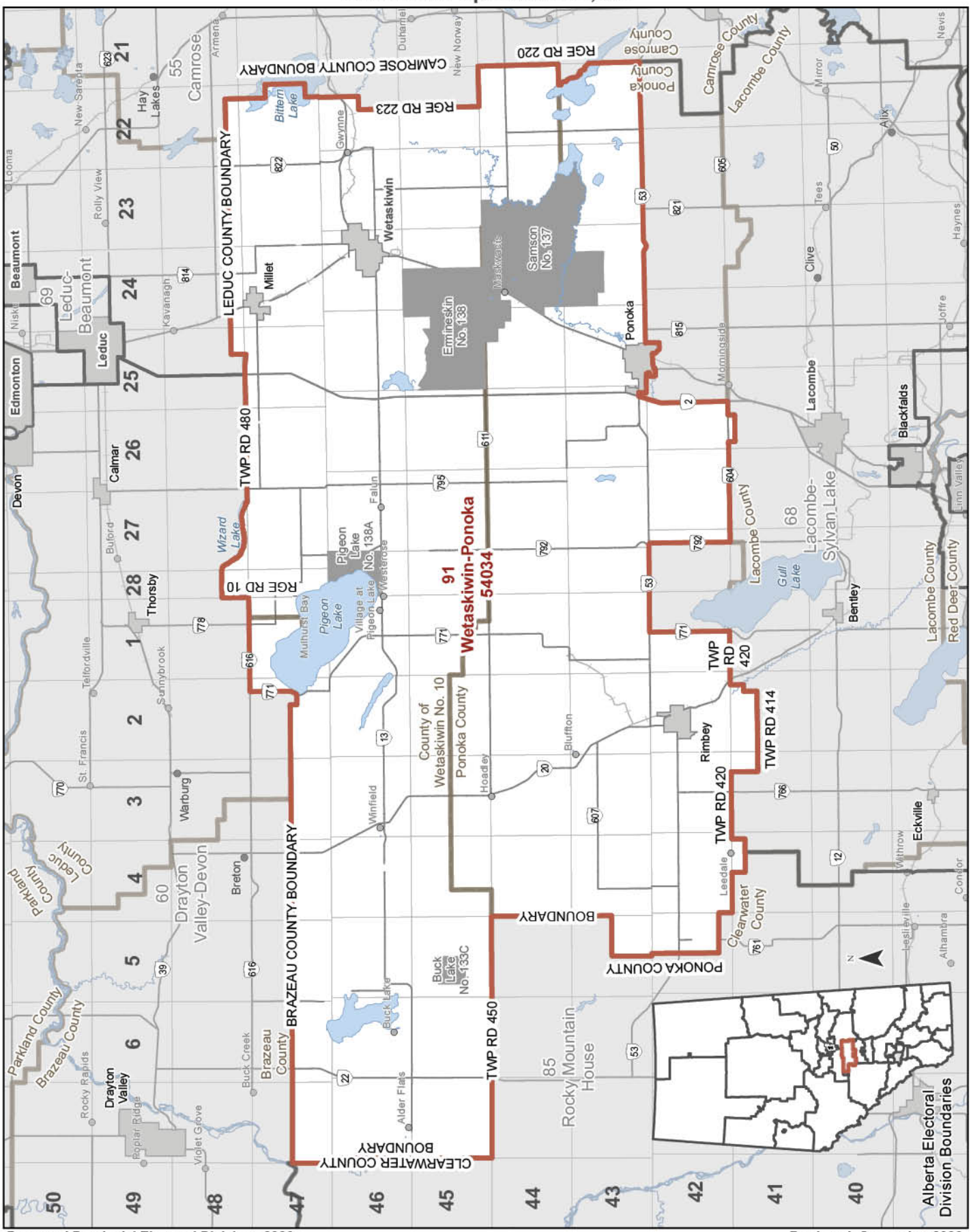
Estimated Population: 51,355



Proposed Provincial Electoral Divisions 2026

Produced: September 2026

Wetaskiwin-Ponoka
Estimated Population: 54,034

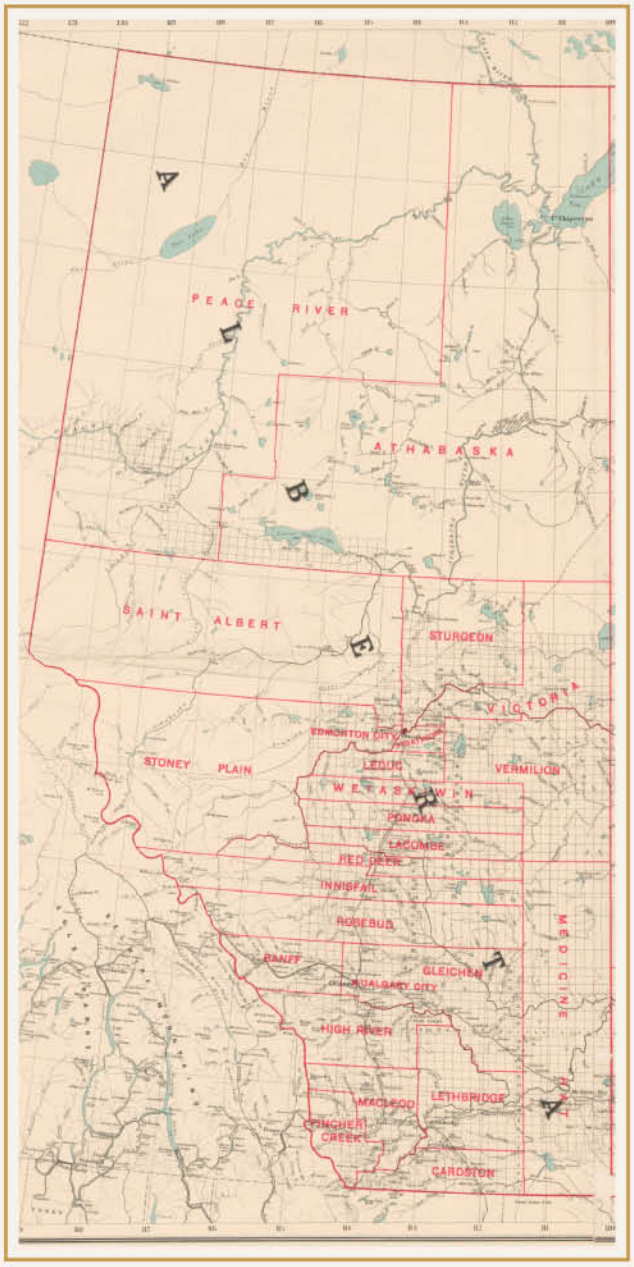


Proposed Provincial Electoral Divisions 2026

Produced: September 2026

ALBERTA

Electoral Divisions, 1905



2026 Independent Advisory Panel on Electoral Boundaries

Report to the Legislative Assembly of Alberta

October, 2026

Alberta detail from James White's electoral divisions map, 1905

University of Alberta Library · William C. Wonders Map Collection · WCW_M000445