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December 17, 2025

Alberta Electoral Boundaries Commission  
Suite 100, 11510 Kingsway Avenue NW  
Edmonton, AB T5G 2Y5  
[info@abebc.ca](mailto:info@abebc.ca)

**Re: Interim Report – Proposed Electoral Boundary Changes and Impacts on School Communities**

Dear Commissioners,

On behalf of the Board of Trustees of Foothills School Division, thank you for the opportunity to provide input on the Interim Report of the Alberta Electoral Boundaries Commission. We recognize the complexity of your mandate and appreciate the care taken to balance population growth, geography, and the constitutional requirement for effective representation.

Foothills School Division serves a geographically large and diverse region that includes rural communities, growing towns, and communities adjacent to major urban and resort areas. From a public education perspective, our school communities are shaped by attendance boundaries, transportation routes, shared services, and family networks — not by municipal or electoral lines.

**Foothills School Division's Current Electoral Context**

Foothills School Division currently serves communities that fall within **three provincial electoral divisions**: *Highwood*, *Banff-Kananaskis*, and *Livingstone-Macleod*. While these ridings differ in geography and population, families within Foothills School Division are united through shared schools, transportation networks, school councils, and advocacy pathways.

Despite spanning multiple ridings, this configuration has remained relatively stable and well understood by families and education partners. It has allowed Foothills School Division communities to engage with elected representatives in ways that reflect established relationships, regional service delivery, and coherent communities of interest from a public education perspective.

**Status Quo as a Coherent and Defensible Education Configuration**

The Interim Report proposes a series of simultaneous boundary changes that, taken together, would have asymmetrical and cumulative impacts on Foothills School Division and the communities we serve. These include:

- potential reconfiguration of the Okotoks area through either a *Calgary–Okotoks* or *Okotoks–Diamond Valley* option;
- the proposed shift from *Banff–Kananaskis* to *Banff–Jasper*, expanding and re-orienting representation for Foothills-connected families west and south of the Highwood River; and
- the reassignment of communities in the Millarville area to *High River–Vulcan*, contingent on the configuration ultimately selected for Okotoks and surrounding communities.

In this context, communities that currently fall within *Livingstone–Macleod* are not merely adjacent to these changes; Foothills-connected areas are being actively reassigned across multiple proposed electoral divisions as part of broader population-balancing adjustments.

From an education system lens, these concurrent changes would alter representation across multiple edges of Foothills School Division's catchment at the same time. The current configuration remains **coherent, functional, and well understood** by families, school councils, and education partners. It supports continuity of advocacy, accessibility to elected representatives, and alignment between MLAs and the school communities they serve. Any departure from this arrangement should therefore be clearly justified and demonstrably improve effective representation for school communities.

### **Primary Impact to Foothills School Division: Okotoks and Surrounding Communities**

The most significant proposed change affecting Foothills School Division relates to the future configuration of Okotoks and surrounding communities, with options that would place Okotoks within either a *Calgary–Okotoks* or an *Okotoks–Diamond Valley* electoral division.

Foothills School Division's schools, transportation networks, staffing models, and parent advocacy structures are deeply integrated across Okotoks, Diamond Valley, and surrounding rural communities. These connections reflect how families live, work, and access public education, forming a clear and established community of interest.

A *Calgary–Okotoks* configuration would represent a substantial departure from this alignment, blending urban and regional education contexts in ways that risk fragmenting school communities and complicating advocacy for education infrastructure, student supports, and long-term planning. Maintaining alignment with Diamond Valley more closely reflects existing school communities and supports continuity in education representation and engagement.

### **Compounding Impact: Shift from Banff–Kananaskis to Banff–Jasper**

In addition to the Okotoks-area reconfiguration, the proposed shift from *Banff–Kananaskis* to *Banff–Jasper* represents a second major change affecting Foothills School Division's broader catchment.

Foothills School Division serves students and families connected to the *Banff–Kananaskis* region whose employment patterns, transportation routes, and educational pathways are oriented south and east toward Foothills County. Expanding this riding northward to include Jasper significantly increases the geographic scope and diversity of the constituency, raising concerns about accessibility, continuity of relationships, and sustained advocacy for education services relevant to Foothills-connected families.

## Fragmentation of Foothills School Division Families Across Multiple Electoral Divisions

When the proposed boundary changes are considered together — rather than in isolation — Foothills School Division has significant concerns regarding the fragmentation of a single public school system across multiple provincial electoral divisions. These combined effects may not be readily apparent to families reviewing individual maps or proposals, yet together they would substantially alter how Foothills School Division communities are represented provincially.

Under the configurations outlined in the Interim Report, families whose children attend Foothills School Division schools would be represented across **three or more provincial electoral divisions**, including:

- Calgary–Okotoks or Okotoks–Diamond Valley
- Banff–Jasper
- High River–Vulcan
- with additional redistribution pressures affecting communities currently within *Livingstone-Macleod*

This would result in families from the same school communities — including those in **Diamond Valley and the Millarville area** — being represented by MLAs whose constituencies span vastly different geographies, economic drivers, and policy priorities. Families with strong ties to Foothills-based schools may not reasonably anticipate being represented within a riding extending from Banff to Jasper, nor to see neighbouring communities reassigned to different electoral divisions.

From an education system perspective, this fragmentation introduces challenges that extend beyond population distribution, including:

- reduced clarity for families seeking to advocate for education issues;
- increased complexity for school councils and trustees engaging with elected officials;
- weakened continuity in relationships between MLAs and school communities; and
- greater difficulty advancing coordinated advocacy for school infrastructure, transportation, and student supports.

## Education Systems as Communities of Interest

The Commission's Interim Report rightly emphasizes that effective representation extends beyond population parity to include accessibility, communities of interest, and the ability of elected officials to meaningfully serve their constituents. Foothills School Division respectfully submits that **public education systems and school communities are a critical component of those communities of interest**.

Foothills School Division's submission is intended to assist the Commission by identifying affected electoral divisions, outlining specific education-system concerns, proposing guiding considerations to address those concerns, and highlighting the interconnected effects of boundary changes on neighbouring ridings.

As the Commission moves toward its final recommendations, Foothills School Division urges that the proposed boundary changes be assessed **collectively and in their full context**, rather than as discrete adjustments. When viewed together, the cumulative impacts on a single public school system — and on the families, students, and communities it serves — become both clearer and more consequential.

Given the scale and cumulative nature of the proposed changes affecting Foothills School Division, we respectfully request that the Commission's final report clearly articulate the justification for these boundary adjustments, including how education-system impacts were considered. This clarity is essential so that families and school communities can understand how proposed changes advance effective representation.

Respectfully,

A handwritten signature in black ink that reads "Theresa Letendre".

Theresa Letendre  
Chair, Board of Trustees  
Foothills School Division