

Written Submission

on the 2025 Electoral Boundaries Commission Interim Report

Name/Nom Kate Hearn and Elwood Stone

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Submission/Message

As residents of the Ingraham Trail for 37 years, we appreciate the Commission's invitation for public input on its Interim Report on electoral boundaries. We write to offer our perspectives on the proposal, in all four options, to transfer the Ingraham Trail (and other unincorporated areas near Yellowknife) from Yellowknife districts to Tu Nedhé-Wiilideh. We believe the Commission's thoughtful proposal may inadvertently create significant representation challenges for unincorporated area residents.

1.0. Understanding Tu Nedhé-Wiilideh's Geographic Complexity

Tu Nedhé-Wiilideh already represents diverse communities with distinct needs: Ndilo and Dettah (proximal to Yellowknife), Fort Resolution (630 km by road), and Łútséł K'é (190 km by air, accessible only by seasonal winter road). Adding the Ingraham Trail to Tu Nedhé-Wiilideh would create a constituency spanning urban-adjacent Indigenous communities, remote fly-in communities, and rural populations—each with fundamentally different governance structures and service delivery models. We respectfully suggest this may stretch effective representation beyond what can reasonably be accomplished.

2.0. Community of Interest: Geography and Daily Reality

The Supreme Court in *Reference re Provincial Electoral Boundaries* (Sask.) requires consideration of "geography, community history, community interests and minority representation." The Commission justifies including unincorporated areas such as the Ingraham Trail in Tu Nedhé-Wiilideh by stating that "many of the permanent residents of those areas are members of Yellowknives Dene First Nation" (page 17 of the Commission's Interim Report).

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Without access to the underlying demographic data that the Commission used to support the statement, we can only share our lived experience: we reside within Chief Drygeese Territory and the Môwhì Gogha Dè Nîtâèè boundary of the Tłı̨chǫ Land Claim. We have observed a diverse population among the people residing on the Trail. Our daily reality connects us entirely to Yellowknife—shopping, healthcare, all services, emergency response (ambulance, RCMP), employment, schools and social networks. We're 30 minutes from Yellowknife versus 630 km from Fort Resolution with no road connection to Łútséł K'é.

An MLA, if based in communities remote from Yellowknife, would face significant travel challenges meeting Ingraham Trail constituents when the Legislature isn't sitting. We don't presume to speak for the wishes of Indigenous communities, but we deeply respect the importance of their wishes which may include a desire for strong representation from their MLA that is focussed exclusively on their specific interests. We question whether adding the Ingraham Trail to geographically distant unincorporated populations serves anyone's interests well.

3.0 The Challenge of Competing Advocacy Priorities

We speculate that capacity funding for band councils and self-government, infrastructure, health care, Treaty rights support, and Indigenous community-based program delivery through Indigenous governments may be crucial priorities of those constituencies, that require an MLA's full attention and expertise. Our concern is that simultaneously advocating for an unincorporated area, such as the Ingraham Trail's needs, creates unavoidable tensions. From the perspective of a Trail resident, our needs are direct territorial service delivery (because we have no local government), highway maintenance, emergency services coordination, program eligibility resolution, and civic addressing advocacy. These compete for the same limited territorial resources and attention as small communities and require fundamentally different policy approaches.

This isn't about whether one community or community of interest matters more than another—it's whether any MLA can effectively advocate for such potentially divergent, or at the very least, broad-ranging priorities simultaneously.

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Remaining within a Yellowknife riding avoids this conflict. Yellowknife's tax-based municipal revenue reduces competition for territorial funds between urban and unincorporated constituents. If the day comes when the long-standing irritant to the City of Yellowknife, of Ingraham Trail residents accessing some City services becomes a matter of negotiation between, not individual residents of the Ingraham Trail and the City, but the City and GNWT and it will be important to have an MLA with an understanding of both constituencies. Remaining in a Yellowknife district ensures we retain that informed voice through any such negotiations—something we would worry would if placed in Tu Nedhé-Wiilideh.

4.0. The Invisibility of the Ingraham Trail to the GNWT

Numerous territorial programs base eligibility on "residence in a community" or "local government boundaries," systematically excluding unincorporated community residents. We require an MLA that is positioned to provide dedicated advocacy to address this issue. For example, we're ineligible for NWT Housing Corporation programs including Seniors Aging in Place, Seniors Home Repair, and Preventative Maintenance funding because these require residence within municipal boundaries. As seniors, we, and our neighbours, cannot access supports that are available to territorial residents living 30 minutes away. The 2018 NWT Emergency Plan contained specific provisions outlining GNWT responsibilities for unincorporated areas. The 2024 update deleted these references. Meanwhile, Yellowknife withdrew structural fire protection services, leaving residents with no organized fire response. We lack civic addresses, complicating emergency response, mail delivery, and access to services requiring formal addresses. We are subject to property taxation in the General Taxation Area yet receive very limited services.

As seniors aging in place on the Ingraham Trail, these exclusions have very real consequences. After more than 30 years contributing to the NWT economy and paying territorial taxes, we're ineligible for programs designed to help seniors remain safely in their homes. The irony is stark: we're "residents of the NWT" for taxation but "non-residents" for program eligibility.

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Nowadays, there seem to be more seniors aging in place on the Ingraham Trail—many of us stayed here rather than retiring in cheaper Southern jurisdictions, because we are committed to, and passionate about, the North and we also love the rural lifestyle offered by the Trail—we need an MLA who is not struggling to reconcile a wide range of diverse issues, but one that can prioritize his or her advocacy for policy changes that recognize our existence and contributions, while still being able to effectively support other groups in their riding.

5.0 Data Quality Concerns

All current estimates build on the 2021 Census—conducted before the 2023 wildfires (evacuating 70% of territorial population), the Diavik closure announcement (March 2026), and during pandemic recovery. Statistics Canada documented 8.04% net under-coverage in the NWT's 2021 Census—approximately 1 in 12 residents miscounted. Territorial modeling updates the statistics annually, but we question the robustness of the models when the NWT has been subject to such sweeping and unprecedented events that could have a significant impact on population.

For unincorporated areas, these challenges compound: Without civic addresses or local government records, census enumerators struggle to locate residences. In our experience, many of us, valuing privacy, have historically declined surveys. Some of us who appreciate the importance of participating have been missed out entirely under census processes. We understand that the NWT Community Survey doesn't survey Ingraham Trail residents at all—meaning no statistical basis exists for estimating our population, growth trends, or demographics.

We know, anecdotally, that the Trail population has grown significantly but cannot prove this with data. When the Commission attempts mathematical precision "by 8 people" using data with known 8% uncertainty collected before unprecedented disruptions, we respectfully suggest this risks prioritizing arithmetic over the "community of interest" factors the Supreme Court emphasized. When data is uncertain, tangible daily connections—work, shopping, services, community—become even more important guideposts.

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6.0. A Modest Proposal Worth Considering

Given the challenges of representing an unincorporated populations' distinct needs, we wonder whether the Commission might consider an electoral district for voters residing in unincorporated communities (for example, Ingraham Trail, Highway 3, Dettah Road, Lindbergh Landing, Checkpoint etc.) throughout the NWT. This would acknowledge that scattered unincorporated populations share common governance challenges regardless of geography and representation issues. We believe the NWT might be unique in Canada, as we have two Indigenous communities that were carved out of the electoral district surrounding them and placed in Tu Nedhé-Wiilideh electoral district which is non-contiguous to community boundaries. Therefore, it appears that the NWT has already set a precedent of having non-contiguous areas forming an electoral district. An MLA representing unincorporated areas specifically could focus on the unique policy challenges—program eligibility, emergency services, civic infrastructure, challenges of living “off grid”, direct territorial service delivery, giving a stronger voice to voters who live in areas where they have no voice at the local government level.

7.0 Cost

We offer this tentatively, recognizing it may present challenges under the Commission's Terms of Reference, but believe it merits consideration. While we understand cost cannot be the Commission's primary consideration, effective representation requires government capacity to respond to constituent needs. The GNWT operates close to its borrowing limit while pursuing annual savings to restore fiscal balance. We estimate each new MLA represents approximately \$350,000-400,000 in permanent, inflation-indexed expenses. When government lacks fiscal capacity to implement what representatives advocate for, residents' voting power becomes diminished and somewhat hollow. Therefore we strongly oppose any changes that increase the number of electoral districts.

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8.0. Our Recommendation

We respectfully urge the Commission to maintain the Ingraham Trail, within Yellowknife electoral districts. This approach:

- Respects our actual community of interest connections based on daily reality
- Avoids creating impossible advocacy conflicts for MLAs
- Ensures unincorporated community residents have dedicated representation for unique governance challenges, and
- Acknowledges that effective representation requires stable boundaries grounded in demonstrated community connections

If population adjustments require redistricting which of the Yellowknife districts include us, we're comfortable with that outcome. Our concern is specifically the placement in Tu Nedhé-Wiilideh, where our distinct needs as unincorporated community residents may risk being overshadowed by the legitimate and important priorities of the GNWT in moving toward Reconciliation.

9.0 Conclusion

The Commission's mandate is effective representation for all northerners. For Ingraham Trail residents, this means representation by an MLA who shares our geographic proximity, economic connections, service delivery region, and understanding of unincorporated area challenges—not an MLA whose focus may end up being split between supporting remote Indigenous communities with entirely different governance structures and advocacy priorities.

We offer these comments in the spirit of collaborative problem-solving, hoping they assist the Commission in finalizing recommendations that will have the support of the Legislative Assembly and serve all NWT residents well.

Respectfully submitted,
Kate Hearn and Elwood Stone
Ingraham Trail Residents, Yellowknife North Constituents