



January 11, 2024

Honourable Devin Dreeshen
Minister of Transportation and Economic Corridors
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Government of Alberta

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Dear Minister Dreeshen, and Members of Banff Town Council:

Calgary Airport Banff Rail Proposal – Response to ENGO Letters from December 8, 2023

We are writing in response to two letters dated 8th December 2023 from local representatives of environmental groups, including Alberta Wilderness Association, Bow Valley Naturalists, Canadian Parks and Wilderness Society Southern Alberta, and Yellowstone to Yukon Conservation Initiative, (ENGO Group) that were sent to you and copied to all three levels of government (Parks Canada, Provincial Ministers and opposition politicians, and four municipalities) and the Stoney Nakoda regarding the proposed Calgary Airport – Banff Rail (CABR) project and the Banff Railway Lands Area Redevelopment Plan (ARP). As the two letters are very similar and both are copied to the same parties, we will reference both letters (the ENGO Group Letters). Liricon is the proponent of both CABR and the ARP and was not copied on these letters, (instead sent to us by governmental stakeholders) which we suggest is indicative of the ENGO Group’s approach to engagement with these initiatives.

The ENGO Group Letters express their views on the challenges facing the Bow Valley’s Rocky Mountain Parks, two of which we agree with, namely:

- 1) ENGO Challenge #1 – Personal Vehicles Degrading Parks: Over several decades the Rocky Mountain Parks have struggled to address growing visitation reliant on personal

vehicles, which has increased congestion and reached a crisis point, degrading both the environment, visitor and resident experience. We completely agree.

- 2) ENGO Challenge #2 – Little Mass Transit Implemented to and in Parks: Despite calls from Banff residents and visitors, numerous studies, expert panels and policies for the government to develop mass transit solutions to and around the parks, aside from ROAM, few substantive solutions have been implemented. We completely agree.

The ENGO Group Letters site concern for rising visitation and their implied solution is to limit park visitation. The ENGO Group believes visitation can be limited by rationing access to the parks through “visitor management” and advocate delaying the implementation of effective mass transit solutions while said “visitor management” can be studied.

We vehemently disagree with limiting visitation to the parks. Limiting visitation does little to enhance the environment, denies Canadians and Albertans access to their country’s and their province’s most popular parks and impacts the economy.

In fact, the parks do not have a visitor problem, they have a personal vehicle problem. By far the biggest opportunity to enhance the parks’ ecosystem is by reducing the impact of personal vehicles accessing and travelling to them.

Consequently, CABR and the ARP offer a solution: develop taxpayer-friendly mass transit to and around the parks that transfers the project, operational, and cost risk from government to the private sector. CABR follows the Lower Each Visitors Environmental Footprint (LEVEF) strategy. Rather than reducing visitation, CABR will mode shift it by replacing personal vehicles with mass transit. By creating the framework for a multi-modal transit hub, the ARP is key to supporting CABR.

The ENGO Group Letters make clear that they misunderstand CABR and the ARP and base their argument on many factual errors regarding CABR and the ARP – more below. As a quick example, the ENGO Group claim that “*CABR would further set back progress*” on reducing train-wildlife interactions while failing to recognize that personal vehicles kill more wildlife than trains each year in Banff and CABR will remove millions of personal vehicles from the road each year.

The ENGO Group response to CABR and the ARP: seek to delay. The ENGO Group calls for an indefinite pause to the ARP by the Town of Banff and CABR by the Government of Alberta until the ENGO Group’s proposed ‘hierarchical strategic approach’ is complete.

We strongly disagree with the ENGO Group call to pause CABR and the ARP for the following four reasons:

- 1. CABR and ARP support numerous existing policies and studies.**

The ENGO Group indicates they cannot recommend CABR and the ARP without “*comprehensive independent studies to determine the best options to improve public*

*transportation while ensuring an overall net environmental benefit.” CABR and the ARP have been preceded by Parks Canada and the Town of Banff sustainable transportation research and policy development pointing to the need for increased mass transit to and within Banff National Park. This includes: the *Banff National Park Management Plan 2010 and 2022*; the *Town of Banff Master Transportation Study 2016*; the *Banff Community Plan 2008*; *Lead Tourism for Good: 10 Year Vision for Tourism in Banff and Lake Louise*; and recommendations put forth in the *Expert Advisory Panel on Moving People Sustainably in the Banff Bow Valley, 2022*.*

2. Both CABR and individual projects under the ARP still require extensive consultation and review processes as they move forward.

The ENGO Group appears to misunderstand the purpose of an ARP. An ARP is not an individual project, nor is it a replacement for individual project review processes. It is a planning document that Liricon and the Town of Banff together and voluntarily prepared to outline a vision for redevelopment of the Banff Railway Lands Area. All ARPs within the Banff townsites require thorough consultation and approval by the Federal Environment and Climate Change Minister.

An ARP in no way permits associated project components to proceed without further engagement and review. Individual projects proposed under the ARP will still trigger separate and comprehensive review processes per project component. In short, stakeholders such as the ENGO Group will still have ample opportunity to raise concerns and advocate for or against approval of projects nested within the ARP.

In the case of CABR, and as mandated by the provincial and federal governments, should project proponents reach a project development agreement with the Province of Alberta, formal consultation will begin and include commissioning detailed studies, community engagement, environmental assessments, and permitting. These activities are estimated to take at least 18 months and are necessary before any final decision (including a final investment decision) is taken by Alberta’s government, the Canada Infrastructure Bank, responsible federal and provincial authorities and project proponents.

We are confident that all of these processes combined will provide an equal or greater level of public study and review compared to the “hierarchical strategic approach” recommended by the ENGO Group, and address their concerns about data completeness necessary to inform decision making.

3. Both CABR and the ARP have undergone extensive consultation since their inception.

Since receiving from the Town of Banff the ARP’s Terms of Reference in February 2019, Liricon has hosted more than 10 open houses related to the ARP. Over the last 5 years, details of and regular updates on the ARP have been posted online at <https://banffecotransithub.ca>.

In the case of CABR, the project has already advanced through numerous government specified processes. Since March 2016, CABR has been advanced through a collaboration among all three

levels of government including the Bow Valley Corridor Alliance (the Municipalities of Calgary, Cochrane, Canmore, and Banff), the Province of Alberta (through multiple ministries and the Premier's office), and the Federal Government (with the Canada Infrastructure Bank funding feasibility studies and providing 50% of CABR's capital.)

The ENGO Group claims that "*public consultation has been limited*" and indicates concern that Liricon/Plenary is advancing CABR without due communication with them. Early on, Liricon requested meetings with various representatives of the ENGO Group. At that time, they made clear that their organizations' mandates were not to help advance private sector solutions to environmental challenges, but instead were advocacy entities focused on identifying ecosystem issues and calling upon governments to solve them. CABR and the ARP - private sector solutions to environmental challenges - did not fit the ENGO Group advocacy model. We are, however, pleased to see the ENGO Group's intention to become more actively involved in CABR's and the ARP's review processes as they are important stakeholders, and we remain open to direct communication if that is now of interest to their groups.

4. Both CABR and the ARP have been informed by leading experts to identify opportunities to protect wildlife/habitat and quantify greenhouse gas reduction benefits and will seek further expert advice.

While our attempts to engage organizations within the ENGO Group to listen to their concerns about wildlife/habitat impacts and carbon emissions have not proven fruitful, we have proactively engaged leading academic experts on both topics and will continue to do so. For example, to identify optimal mitigations along the proposed CABR line, we consulted Dr. Colleen Cassady St. Clair, Professor of Biological Sciences at the University of Alberta, an expert on linear impacts, wildlife conservation and management with an emphasis on animal behaviour and human-wildlife conflict.

Our view is that CABR represents a once-in-a-generation opportunity to build in ambitious wildlife mitigations that will improve upon the existing baseline. (In the absence of CABR we see no credible public or private funding path to realizing ambitious mitigations.) We also note that by building the system entirely within the CP Rail right-of-way by twinning the existing track, the project will be operating within an existing major freight corridor that has been previously disturbed and will operate at speeds limited by the existing heavy rail system. Within Banff National Park, there is the opportunity to replicate the wildlife mitigations that have been developed in the Park for the parallel TransCanada Highway, including wildlife fencing and crossings.

Regarding the greenhouse gas emissions reductions benefits associated with CABR, we engaged Dr. David Layzell's team at the Canadian Energy Systems Analysis Research (CESAR) Initiative at the University of Calgary and The Transition Accelerator. Dr. Layzell is a leading expert on industrial and transportation decarbonization, including the production and use of low carbon hydrogen as an energy carrier. Dr. Layzell's research showed that CABR with hydrogen rolling stock could drop the average GHG footprint per person trip down to 1.7 kg/CO₂e, from a baseline of 36.3 kg/CO₂e for visitors to Banff arriving by passenger vehicle, and 17.8 kg/CO₂e

for visitors arriving by bus. You read that correctly: the train option is a full order of magnitude less carbon intensive than the bus option.

As CABR and the ARP advance through formal public consultation, we look forward to sharing more details on these and other environmental research initiatives with all stakeholders.

ENGO GROUP MISUNDERSTANDS CABR AND THE ARP – ENGO GROUP PRIORITIES

The ENGO Group's letters raise several broad misunderstandings of CABR and the ARP, as well as the ENGO Group's priorities for Banff National Park and the Bow Valley. The following is a brief summary. Please refer to this letter's Appendix for a more comprehensive review.

1. ENGO Group appears to agree with CABR's and the ARP's ability to address environmental issues yet claims CABR and the ARP must be paused because Banff is not ready. The letters recognize CABR's and the ARP's environmental objectives but claim they must be paused because Banff is not ready to support sustainable transportation. No evidence is provided that the preparatory phase for supporting visitors arriving by train would take any longer than the permitting and construction phase for CABR itself and indeed the ARP is a first step to achieve this objective.
2. ENGO Group appears to seek visitation limits while CABR and the ARP seek to minimize visitor environmental footprint. The ENGO Group, CABR and the ARP seeks to reduce the ecological impact of increased visitorship. However, the ENGO Group's letters concern on rising visitation indicates they wish to limit the number of visitors, not personal vehicles. In contrast, CABR follows the Lower Each Visitors Environmental Footprint (LEVEF) strategy. Rather than reducing visitation, CABR will mode shift travelers by replacing personal vehicles with mass transit. By creating the framework for a multi-modal transit hub, the Railway Lands ARP is key to supporting CABR.
3. ENGO Group seeks 100% taxpayer-funded mass transit, yet CABR's P3 eliminates provincial capital cost, revenue and ridership risk and the ARP does not rely on taxpayer funds to reduce impact of personal vehicles. The ENGO letters indicate a concern that CABR is not a 100% taxpayer funded government project. Rather, both CABR and the ARP are solutions that have been advocated for decades by a diverse interest groups both locally and nationally to address the impact of personal vehicles (mass transit rail, intercept parking, aerial transit, shuttle systems). Governments have not implemented the required infrastructure to date. For example, after 40 years of Town of Banff policy to create intercept parking, no lot had been developed until Liricon built the Train Station lot in 2019, currently providing 600 parking stalls free of charge. CABR's structure as a public-private-partnership (P3) eliminates taxpayers' capital cost, ridership and revenue risk. The Railway Lands ARP is creating a multi-modal transit hub to address the impact of personal vehicles without any taxpayer funding.

4. ENGO Group ignores existing policies and recent studies and seeks more studies, CABR and ARP support existing policies and studies. The ENGO Group indicates they cannot recommend CABR and the ARP without more studies while ignoring several major government studies and policies supporting CABR and the ARP. Further, the ENGO Group ignores extensive research completed in August 2023 by the Sierra Club, North America's largest environmental organization, which determined that passenger rail provides superior social, economic, and environmental benefits to rubber-tired alternatives in enhancing the environment and recommends governments to move quickly to develop mass transit rail projects similar to CABR.
5. ENGO Group mistakenly assumes CABR is already approved by province and the ARP permits construction. The ENGO Group Letters indicate the Government has already approved CABR without consultation. In fact, CABR's formal consultation will not begin until after a project development agreement between the Province and CABR's proponents is completed. The ARP is merely a planning document and nothing can be built without further approvals.
6. ENGO Group recognizes CABR impacts multiple provincial ministries but fails to reference benefits. The ENGO Group copying the letters to multiple provincial ministers supports Liricon/ Plenary's perspective that CABR and the ARP offers broad and diverse social, economic, and environmental opportunities for Canada, Alberta, Calgary, and the Bow Valley.
7. ENGO Group ignores CABR's collaboration with governments and that the project has advanced through numerous government specified processes. The ENGO Group indicates CABR's approach has been uncooperative and narrow, yet significant collaboration has occurred with much more to come.
8. ENGO Group role: to identify or solve environmental challenges? While formal consultation has yet to begin for CABR and the ARP, since March 2016, there have been dozens of community events detailing the initiatives and information on CABR and the ARP has been made widely available. We recognize that the ENGO Group's traditional role is to identify problems and advocate government to solve them. Unfortunately, the ENGO Group advocating to government model failed to solve the increase in personal vehicles degrading the parks environment as well as the visitor and resident experience. Hence, Liricon stepped forward 8 years ago to see if the private sector collaborating with government model could work to solve the problem.

SPECIFIC ERRORS IN ENGO LETTERS

The ENGO Group letters make at least 10 incorrect claims. The following is a brief summary. A more comprehensive review is included in this letter's Appendix.

1. *Claim: CABR is a risk to environmental, economic, social value*
- *Fact: CABR is good for the environment, society, and the economy*
2. *Claim: CABR would set back human-wildlife impact progress*

- *Fact: CABR will implement mitigations and take millions of personal vehicles off the road*
- 3. *Claim: CABR only benefits the environment if mass transit is hydrogen-powered, which is currently not feasible*
 - *Fact: CABR enhances ecosystem with or without hydrogen and hydrogen is a very practical opportunity*
- 4. *Claim: CABR would increase, not decrease, total transportation emissions*
 - *Fact: CABR would substantially reduce transportation emissions*
- 5. *Claim: CABR will not be able to have the carrying capacity for forecasted ridership*
 - *Fact: CABR can add rollingstock and increase frequency to meet large demand*
- 6. *Claim: CABR is inferior to improving bus service*
 - *Fact: CABR will be utilized 5 to 12 times more than an alternative bus service*
- 7. *Claim: CABR requires an increase in Park gate fees to achieve ridership forecasts*
 - *Fact: CABR can achieve ridership forecasts with existing Park gate fees*
- 8. *Claim: CABR attractive for Calgary Airport to downtown, not downtown to Banff*
 - *Fact: CABR provides environmental, economic, and social benefits for entire route*
- 9. *Claim: CABR Requires the development of a Norquay Gondola*
 - *Fact: CABR is enhanced by, but does not require, a Norquay Gondola*
- 10. *Claim: The ARP overlaps with Parks Canada's Redevelopment of 200 Block of Banff Avenue*
 - *Fact: The ARP's multi-modal transit hub supports any new Parks Canada Visitor Centre or new services in the town of Banff*

CONCLUSION

In conclusion, the ENGO Group proposing a “hierarchical strategic approach” will only serve to stall and delay CABR and the ARP through interminable studies rather than enhance the existing review process. The ENGO Group’s concern is rising visitation and, therefore, the ENGO Group’s apparent solution is to limit park visitation. The incorrect claims in the ENGO Group letters indicate a lack of understanding of both CABR and the ARP. Further, the ENGO Group Letters indicate they wish taxpayers assume 100% of the cost and risk of mass transit solutions and ignore Parks Canada and Town of Banff policies and studies supporting mass transit rail to the park.

Further, The ENGO Group ignores the Sierra Club’s August 2023 study that concludes rail is superior to all forms of rubber-tired transport from a social, economic and environmental perspective and recommends governments develop projects similar to CABR. Dismissing these studies and policies indicates that the ENGO Group is prepared to sacrifice CABR’s and the ARP’s benefits to wildlife, residents, visitors, the parks’ and the planet to achieve their implied goal of limiting visitation to the parks.

By recommending delay on CABR and ARP, it appears the ENGO Group does not believe Banff National Park’s having the highest transportation CO₂ emissions of any national park in the world (63 times the per visitor transportation emissions of Zion National Park) is an urgent problem. They also dismiss the 76% of Albertans and 85% of Calgarians who support CABR and the 80% of Banff residents who want Banff Town Council to approve the ARP. One could

surmise the ENGO Group call for delay is a strategy to exhaust the proponents and hope they give up CABR and the ARP. As proponents of CABR and the ARP, we remain highly motivated to address the impact of personal vehicles on Banff National Park and will see it through to fruition.

As Banff locals, my family and I believe that the privilege of living in the Park brings with it the dual responsibility of being good stewards of the environment and also the obligation to invite Canadians to share everything Banff has to offer. Should locals seek to limit Canadians' access to Banff in the name of environmentalism (when there are innovative solutions available to reduce the impact of personal vehicles) they will jeopardize Banff's future. We believe it is far superior to aid Canadians' sustainable enjoyment of their Rocky Mountain Parks by lowering their environmental footprint with CABR and the ARP than by pursuing a strategy of rationing Canadians' access to their parks.

We look forward to our continued collaboration with you on advancing these transformative initiatives.

Yours sincerely,



Jan Waterous
Manager Partner
Liricon

cc

Nate Horner, President of Treasury Board and Minister of Finance
Todd Loewen, Minister of Forestry and Parks
Rebecca Schulz, Minister of Environment & Protected Areas
Sarah Elmeligi, Banff Kananaskis MLA & Tourism Critic
Jodi Calahoo Stonehouse, NDP Environment Critic
Lorne Dach, NDP Transportation Critic
Salman Rasheed, Banff National Park Superintendent
The Stoney Nakoda Nations
The City of Calgary
The Town of Banff
The Town of Cochrane
MD of Bighorn
Chloe Hahn, Canadian Parks and Wilderness Society – Southern Alberta
Katie Morrison, Canadian Parks and Wilderness Society – Southern Alberta
Kennedy Halvorson, Alberta Wilderness Association
Peter Duck, Bow Valley Naturalists
Sarah Palmer, Yellowstone to Yukon Conservation Initiative

APPENDIX

BROAD MISUNDERSTANDING OF CABR AND THE ARP, ENGO GROUP PRIORITIES

The ENGO Group Letters raise several broad misunderstandings of CABR and the ARP and spotlight the ENGO Group's priorities for Banff National Park:

- 1) ENGO Group appears to agree with CABR's and the ARP's ability to address environmental issues yet claim CABR and the ARP must be paused because Banff is not ready.

The letters recognize the environmental objectives of CABR and the ARP: “As environmental organizations, we appreciate the need to increase access to mass transit that will lower GHGs, reduce traffic on the Trans-Canada Highway, and address congestion in the much-loved Town of Banff and surrounding area.” Further, the letters state “While rail transportation may one day be suitable with thorough data collection and assessment, the Bow Valley is currently ill-equipped to sustainably support this type of new transportation infrastructure and the associated impacts.”

No evidence is provided that the preparatory phase for supporting visitors arriving by train would take any longer than the permitting and construction phase for CABR itself and indeed the ARP is a first step in this.

We share the ENGO Group's desire for Parks Canada to make investments in bus service to points of interest within Banff National Park to ensure train passengers do not require a personal vehicle to experience the Park. However, the ENGO Group letters is clearly “putting the cart before the horse” by claiming that CABR and the ARP cannot be advanced until Parks Canada has made the investments in shuttles.

Further, the ENGO Group ignores the study completed in August 2023 by the Sierra Club, North America's largest environmental organization, which determined that passenger rail provides greater benefits than rubber-tired alternatives from a social, economic and environmental perspective and recommends governments to quickly develop mass transit rail projects similar to CABR.

The Sierra Club study ([Rail Report FINAL.pdf \(sierraclub.org\)](#)) recommends advancing the rail projects first and then supporting infrastructure later:

“However, the change in transportation emphasis from highway to rail should start immediately. Infrastructure projects and associated increases in service can be pursued incrementally. There is no need to wait for the completion of a large-scale construction plan. “

- 2) ENGO Group appear to seek to limit visitation while CABR and the ARP seek to lower Visitors' Environmental Footprint.

Both the ENGO Group and CABR and the ARP seek to reduce visitor ecological impact. However, the ENGO Group Letters indicate its concern is focused on the number of

visitors, stating that after CABR is in service “*the likely increase in visitation would escalate the chance of negative human-wildlife conflicts.*” The ENGO Group is not concerned about personal vehicles and see “*the increased use of electric vehicles*” as reducing the attractiveness of CABR.

The ENGO Group calls upon Government not to advance CABR but imply the solution is to limit visitation: “*Implementation of visitor use management strategies in key areas surrounding the Town of Banff by Parks Canada.*” This suggests limiting access to the Park. Notably, the ENGO Group letters fail to note the benefits to wildlife and the broader environment directly related to CABR removing millions of personal vehicles from the road each year.

In contrast, to enhance the environment, CABR, rather than limiting visitation, follows the Lower Each Visitors Environmental Footprint (LEVEF) strategy. CABR will mode shift visitation – replacing personal vehicles with mass transit. Thus, CABR addresses the motto “Banff National Park has a personal vehicle problem, not a visitor problem.”

In recent years, the Town of Banff has taken very constructive steps to implement the LEVEF strategy by, among other things, introducing paid parking and making investments in ROAM transit. CABR and the ARP will further leverage the Town of Banff investments by making paid parking and ROAM Transit even more effective for residents and visitors.

However, Parks Canada failed to address the challenges of growing visitation in Banff National Park for decades. Recent attempts at visitor management such as the ban on personal vehicles on Moraine Lake Road or limiting parking spots at Lake Louise can only be effective when combined with much more efficient and visitor-friendly transportation alternatives than those provided today. Every year that we do not develop effective, green mass transit to Banff National Park another 4 million vehicles will drive through the park.

In contrast to the ENGO Group, the Sierra Club study concludes that while electric vehicles are part of the solution, rail is more environmentally friendly than EVs which are less energy efficient than rail and require huge new power generation, battery disposal, and still cause congestion:

“Road vehicle electrification is critical, but increasing the number of electric vehicles is only part of the solution to transportation congestion and GHG emissions ... The far greater energy efficiency of rail is the key consideration, given the immense amount of new electric power generation that will be needed to electrify road vehicles. Due to their lower co-efficient of friction, rail alternatives utilize less than a third (and often much less) of the energy of the equivalent rubber-tired alternatives driving on roads. Electric trains powered directly by the grid also lessen the need for batteries, and the environmental impacts of their manufacturing and disposal.”

3) ENGO Group seeks 100% taxpayer funded mass transit, yet CABR's P3 eliminates provincial risk for capital cost and ridership and revenue, and the ARP does not rely on taxpayer funds to reduce the impact of personal vehicles.

The ENGO letters indicate a concern that CABR is not a 100% taxpayer funded government project. According to the ENGO Group Letters, CABR “*would drive public funding to a private operator.*” Further, the Province supporting CABR would be “*reallocating vital public funding to a private company while committing Albertans to a 50-year mortgage and reducing provincial capacity to improve the sustainability and functionality of public transportation into the future.*”

The ENGO Group makes clear they believe the private sector cannot enhance the environment: “*Concern over prioritizing ecological integrity and community interests is heightened by the underlying private interests at play. The mention in the ARP of the previously rejected gondola to Mount Norquay, which is owned by Liricon, points towards using this proposal for further incremental private development.*” The ENGO Group believes that a private operator is somehow unable to develop mass transit that enhances the environment but that 100% taxpayer funded mass transit can.

Both CABR and the ARP are solutions that have been advocated for decades by residents, visitors, environmentalists, and governments to address the impact of personal vehicles (mass transit rail, intercept parking, aerial transit, shuttle systems) that governments have not been able to advance. These solutions have required the participation of the private sector to apply innovation to turn them from dreams into reality. For example, after 40 years of Town of Banff policy to create intercept parking, a lot had not been developed until Liricon built the Train Station lot in 2019 (Liricon is providing the Station's 600 parking stalls free of charge). CABR's structure as a public-private-partnership (P3) eliminates taxpayer risk of capital cost and ridership as well as revenue risk. The Railway Lands ARP is creating a multi-modal transit hub to address the impact of personal vehicles without any taxpayer funding.

4) ENGO Group ignores existing policies and recent studies and seeks more studies, CABR and ARP support recent and existing policies and studies:

The ENGO Group indicates they cannot recommend CABR and the ARP without more studies. Before advancing CABR and the ARP, the Town of Banff should: “*Renew its community plan with clearly defined criteria to evaluate project alignment with the goal of being a sustainable park community.*” The ENGO Group state Government should: “*Explore alternative projects that carry lower risk and align with the potential for a broader regional transportation strategy.*”

The ENGO Group indicates there has been little consideration about transportation in the park: “*Without an overarching transportation strategy or any comprehensive comparisons to other potential solutions, we do not know that the CABR is the best means to increase access to Banff National Park, or that the ARP is the best option for a transportation hub and intercept parking in the Town of Banff.*” The ENGO Group ignores the extensive policies and studies which support mass transit rail to, and sustainable transportation solutions within, the park.

Under the heading data issues, the letters intimates there has been insufficient time to assess the studies done since 2016 to detail the benefits offered by CABR. It also suggests such work may be biased even though much of it has been overseen by a federal agency, the Canada Infrastructure Bank (CIB). This indicates that the bias demonstrated is more on the part of the ENGO groups rather than the proponents.

In contrast, CABR and the ARP are the foundation upon which to implement Parks Canada's and the Town of Banff's sustainable transportation policies and studies including, *Banff National Park Management Plan 2010 and 2022*; the *Town of Banff Master Transportation Study 2016*; the *Banff Community Plan 2008*; *Lead Tourism for Good: 10 Year Vision for Tourism in Banff and Lake Louise Plan 2023*; and recommendations put forth in the *Expert Advisory Panel on Moving People Sustainably in Banff Bow Valley 2022*.

The ENGO Group ignores the Sierra Club study which determined in general that “*Rail systems are most effective in stimulating compact development patterns, increasing public transit patronage and reducing motor vehicle use.*” The Sierra Club study concluded that rail is the most effective transportation system in fighting climate change:

“The inherent energy efficiency of rail transportation means that it is the most climate-friendly form of powered transportation over land. Rail generates only about one-fifth to one-third of the emissions of equivalent road transportation (compared on a ton-mile basis, and often even less on a passenger-mile basis).”

The Sierra Club study recommends governments invest in the development of projects similar to CABR that provide fast, high frequency, safe and reliable passenger service:

“To effectively compete with automobiles in time and convenience, passenger train service must be appropriately fast, frequent, safe, and reliable. Rail transit and regional passenger rail service must be convenient for travel at all times of day or night, not for just commuting to and from the city center for the beginning and end of business hours on weekdays. The Federal, state and local governments need to invest much more in capital projects that will increase rail system capacity and reliability, and open new (or re-open) new passenger rail services.”

The Sierra Club study recommends governments invest in the development of innovative projects similar to CABR that mode shift travelers out of personal vehicles by creating dedicated passenger tracks parallel to major highways through twinning of existing mainline rail corridors:

“The climate crisis solution lies in using rail transportation far more than we do and utilizing it in innovative ways ... Increasing the mode share of rail will require upgrading existing railroad corridors, especially those which parallel

major highways ... Faster, higher-performance and higher capacity rail lines will attract more passengers ... These upgrades include ... adding double – or triple mainline tracks, new or extended sidings, and road-rail grade separation projects. A great improvement in rail service ultimately involves large infrastructure (e.g., track, signal, bridge) projects to configure existing lines to more effective utilization.”

Conducting more studies risks the further investment of \$95 million of private sector and CIB funding, under the supervision of Government of Alberta, to engage in public consultation and complete detailed design work. It would also risk the proposed multi-billion private sector and CIB investment in creating a practical rail solution to address the environmental, economic, and social challenges facing Calgary, the Bow Valley and Banff which could be operational by 2028.

5) ENGO Group mistakenly assumes CABR already approved by the Province and the ARP permits construction.

The ENGO Group Letters indicate the Alberta Government has already approved CABR without consultation: “...we are writing to jointly express our concerns and recommendations regarding the Calgary Airport – Banff Railway (CABR) proposal and the associated Banff Railway Lands Area Redevelopment Plan (ARP). Both projects are intertwined and pose substantial risks to the environmental, economic, and social values concentrated in and around the Town of Banff.” The ENGO Group requests “an indefinite pause to the CABR proposal” until additional studies and consultation is completed.

In fact, CABR’s formal consultation will not begin until after a project development agreement between the Province and CABR’s proponents is completed. The ARP is merely a planning document and nothing can be built without further approvals.

The ARP includes provision for passenger rail services and a gondola terminus because these potential projects are referenced in several Parks Canada policy documents as potential solutions to reduce the impact of personal vehicles in the park. However, these projects, while complementary, are not dependent upon one another and would require separate and additional approvals from government before anything could be advanced.

We find it ironic that the ENGO Group requests “an indefinite pause to the CABR proposal” before any of the work necessary to address their concerns has commenced. At the same time the ENGO Group letters seem to ignore the extensive feasibility study work completed since 2016 with numerous studies and peer reviews all of which have concluded that mass transit is required to address congestion and emissions in Banff National Park. The goal seems to be to object and delay progress rather than genuinely address concerns. Consequently, the letters prematurely raise several issues that will be addressed during the design phase and associated consultation.

The ARP, therefore, seems to be exactly the type of community planning and input process which the ENGO Group suggests is an important step in considering a project

like CABR, which makes it particularly odd that they sent two letters the same day objecting to both things.

6) ENGO Group recognizes CABR impacts multiple provincial ministries, fails to reference benefits.

The issues raised and the fact the ENGO Group letters were copied broadly (including the Ministers of Transportation and Economic Corridors, Finance, Forestry and Parks, Environment and Protected Areas) supports Liricon/Plenary's perspective that this project offers broad and diverse economic opportunities for Alberta, Calgary, and the Bow Valley.

However, the ENGO Group Letters fail to reference any benefits from CABR (for example in Finance – economic growth, labour mobility, Forestry and Parks – sustainable transportation for the 5.2 million annual visitors to Kananaskis, Environment and Protected Areas – North America's first hydrogen powered, zero emission passenger train).

Given CABR's benefits span multiple ministries, Liricon/Plenary has recommended a senior level and multi-ministerial oversight committee to assess the benefits and risks of CABR for Alberta.

7) ENGO Group ignores CABR's collaboration with governments, CABR has been advanced through government specified processes.

The ENGO Group indicates CABR's approach has been uncooperative and narrow: *“As the final stop of the CABR, the Town of Banff holds a crucial role in adopting a more cooperative and comprehensive approach.”*

In fact, CABR has been advanced since March 2016 through a collaboration between all three levels of Government including the Bow Valley Corridor Alliance (the Municipalities of Calgary, Cochrane, Canmore, and Banff), the Province of Alberta (through multiple ministries), and the Federal Government (with the Canada Infrastructure Bank funding feasibility studies and providing 50% of CABR's capital). CABR has progressed through an enormous team effort between all three levels of government who have conducted extensive studies which support passenger rail through the Bow Valley as an important solution for sustainable mass transit.

The cooperation is best exemplified as governments, communities and stakeholders along the train route including the Airport, downtown Calgary, Cochrane, the Stoney Nakoda First Nation, Canmore, and Banff prepare for station location and design.

8) ENGO Group role: to identify or solve environmental challenges?

The ENGO Group suggests concern that Liricon/Plenary is advancing CABR without consulting them. The ENGO Group Letters states *“To date, public consultation has been limited and the lack of communication with local environmental groups on a project*

purportedly for the benefit of the environment raises the question of who else may be left out of the conversation.”

Since launching CABR’s Phase 1 in March 2016, there have been several dozen community engagement events providing details of the project. Liricon/Plenary has been transparent on its proposal with the government and has ensured information on the project is widely available. Of note, the ENGO Group Letters did not copy Liricon, nor have they expressed their concerns to Liricon in any meaningful way.

Friends of CABR, a non-profit community group seeking to advance the project (with no financial support from Liricon/Plenary) regularly posts online updates on the project. This extensive public information allowed the ENGO Group to reference many of CABR’s details in its letters.

We welcome constructive input into both CABR and the ARP. Feedback from various stakeholders over the last 7 years has led to many substantive changes in both initiatives. Input from stakeholders led to CABR’s first expansion from downtown Calgary to the Airport and second expansion from the Airport to Calgary Transit’s Blue Line LRT. Similarly, input from stakeholders led to the ARP’s original plan to be modified by replacing approximately 2,000 intercept parking stalls with a 5.4-hectare wildlife corridor enhancement.

CABR’s formal consultation with various stakeholders will begin when the project development agreement between the Province and Liricon/Plenary is completed. We look forward to the start of the formal public consultation and the opportunity to engage with environmental groups, communities, Indigenous Peoples and other interested parties, under the leadership of the Province to allow the full benefits of CABR to be realized.

There is plenty of blame to go around for the lack of progress over the past few decades in developing green mass transit options to reduce the impact of personal vehicles on Banff National Park. Clearly, the historic model of the ENGO Group advocating government to solve the problem failed. A government-run rail system between Calgary and Banff was shut down more than three decades ago. Participation by the private sector was required to develop a high frequency, reliable, mass transit rail system from Calgary. Hence, CABR’s public-private partnership structure.

SPECIFIC ERRORS IN ENGO LETTERS

- 1. Claim: CABR risk to environmental, economic, social value***
 - Fact: CABR Good for the environment, good for the economy***

The ENGO Group Letters incorrectly claim that CABR presents “*a substantial risk to the Bow Valley’s environmental, economic, and social value.*”

In fact, the status quo without rail represents the largest environmental, economic, and social risk and the sustainability of Alberta's world class mountain recreational facilities. Allowing the existing conditions of personal vehicle congestion to continue risks the ecosystem, diminishes visitor and resident experience, and threatens the tourism economy. By fostering enhanced visitor opportunities and more sustainable transportation to the parks and reducing GHG emissions by visitors, CABR is the only way to achieve Parks Canada's objective of substantially reducing the ecological impact of personal vehicles in any realistic timeframe.

Banff National Park urgently needs CABR to reduce the impact of personal vehicles. Increasing congestion from Calgary to Banff and around the park has led to deteriorating environmental outcomes and visitor experiences. Transportation related to Banff National Park produces approximately 105,000 metric tons/ CO₂/ year (Transition Accelerator, August 2020), the largest transportation emissions of any national park in the world or 63 times the per visitor transportation emissions of Zion National Park in the United States. The day to start assessing rail solutions is here.

The data the ENGO Group refers to the same data that demonstrates the need for CABR:

- the economic value of tourism in the Rocky Mountain region is now \$1.48 billion annually, generating approximately \$260 million in direct taxes to the Province and supporting over 18,540 tourism jobs

- Annual visitation to Banff National Park is now over 4 million people and has grown at a compound annual growth rate (CAGR) of over 3% a year for over a decade. Annual visitation to Kananaskis Country is now 5.4 million people.

In contrast to the ENGO Group, the Sierra Club study identifies the multiple social, economic, and environmental benefits of developing mass transit rail:

“Factoring in all costs (economic, environmental, social, etc.), it is too expensive to build and maintain new roads when improved rail transportation can be developed to more economically handle the same throughput (equivalent amount of passenger and freight transportation for lower cost)... Implementing improved rail services is an important part of the solution to both transportation equity and climate challenges. Well planned, robust passenger and freight rail operations provide benefits such as good jobs, equitable mobility, health and safety, reduced greenhouse gas emissions, reduced traffic congestion, and reduced damage to highway infrastructure. The rail safety record is also substantially better than that of highway (although both rail and highway safety can and should be made safer).”

The Sierra Club study also identifies that the increase in transit-oriented development with passenger rail provides both economic and environmental benefits:

“Passenger rail transport promotes more transit- oriented development, the very kind of walkable land use patterns that reduce GHG emissions. Evidence from metropolitan areas across the U.S. and the world show that compact land use patterns are associated with

dramatically less GHG emissions per capita compared with sprawling automobile-oriented land use patterns.”

- 2. Claim: CABR would set back human-wildlife transportation impact progress**
 - **Fact: CABR will implement mitigations and take millions of personal vehicles off the road**

The ENGO Group letters incorrectly suggest that wildlife will be adversely affected by CABR. The letters notes: “*Available research has identified further strategies to mitigate injuries and mortalities on roads and the railway, however, these are still underutilized in Alberta.*” and then erroneously suggests that “*CABR would further set back progress and add to the amount of mitigation efforts required.*”

To claim that “*CABR would further set back progress*” on reducing train-wildlife interactions without recognizing it would remove millions of personal vehicles from the road each year (thereby reducing personal vehicle-wildlife interactions) reveals the lack of basic logic and rigorous thinking in the ENGO Group’s commentary on the proposed CABR project.

For perspective, between 2005 – 2018 in Banff National Park alone, there were a total of 892 animal fatalities - 421 from highway collisions (47%), 387 from rail (43%), 81 from management destruction. Despite the Trans-Canada Highway being fenced through Banff National Park and the freight railroad currently being unfenced, cars kill more animals than trains do in the park. These figures do not account for animals killed on the Trans-Canada Highway outside of Banff National Park between Calgary and Banff by visitors to the parks

Within Banff National Park, there is the opportunity to replicate the wildlife mitigations that have been developed in the park for the parallel Trans-Canada Highway, including wildlife fencing and crossings. We agree the next stage of detailed work should provide information on how the project will reduce impacts on wildlife movement and mortality through crossing structures, speed reductions, or other measures to alert and deter wildlife in the rail corridor.

CABR will put in mitigations that will serve both passenger and freight trains (which currently do not have such mitigations) with a goal to reduce the number of wildlife deaths from trains and personal vehicles.

- 3. Claim: CABR only benefits environment if hydrogen powered which is not feasible**
 - **Fact: CABR enhances ecosystem without hydrogen and hydrogen is very practical**

The ENGO Group Letters incorrectly claims that CABR's "*viability as a climate solution is contingent on the train running on hydrogen, a prospect that current research suggests is likely not feasible in the Bow Valley. Since hydrogen fueling is relatively new to Alberta, there is no built infrastructure along the train’s route, nor do we know the full extent of infrastructure required, a timeline for advancing such technology, or the extent of the potential threats to natural resources.*”

CABR's viability as a climate solution is not contingent on running hydrogen trains since the major reduction in emissions occurs from the greater efficiencies of trains relative to personal vehicles even when locomotives are diesel-powered. Hydrogen is a further improvement and has demonstrated its commercial and technical viability in the years since Liricon/ Plenary first submitted its CABR proposal. Indeed, several Alberta Ministers joined us in August 2023 and rode a demonstration of Alstom's Coradia I-Lint hydrogen multiple rail unit in Quebec.

The ENGO Group's argument that hydrogen refueling is "*likely not feasible in the Bow Valley*" reveals a misunderstanding of the range and features of hydrogen powered rollingstock. This train can complete the round trip to Banff on a single tank of hydrogen, fueled at the Calgary International Airport. Additional hydrogen refueling at Banff or Kananaskis would further improve emissions reduction by allowing shuttle buses and other activities to utilize hydrogen as a fuel.

- 4. Claim: CABR would increase, not decrease, total transportation emissions**
 - **Fact: CABR would substantially reduce transportation emissions**

The ENGO letters incorrectly claim that "*the train would add rather than reduce total transportation emissions.*" For the ENGO Group letters to suggest that CABR would result in a net increase in transportation emissions reveals a lack of understanding of passenger train relative to personal vehicle emissions.

Following a June 7, 2022, letter from the ENGO Group, CIB, CPCS and WSP reviewed and revised their methodology for the calculation of emissions reductions resulting in no material change which makes clear emissions reduction from CABR. Since that time, CABR has conducted a more comprehensive ridership forecast which estimates even higher ridership. Consequently, the anticipated emission reductions are far greater than the numbers being debated in this letter.

- 5. Claim: CABR will not be able to have the carrying capacity for forecasted ridership**
 - **Fact: CABR can add rollingstock and increase frequency to meet large demand**

The ENGO Group letters incorrectly claim that the CABR forecast of 11.8 million riders per year by 2035, with an estimated 20%, or 2.36 million riders traveling to Banff from Calgary "*...would require a carrying capacity that exceeds that of current options available on the market for hydrogen-powered passenger rail.*" We have no idea how the group reaches this conclusion. CABR's capacity will depend upon the length and frequency of the trains it runs. The need for a high-capacity rail system to make a meaningful impact on congestion and vehicle emissions is also a strong argument against the group's next position that a bus service can do the job.

- 6. Claim: CABR is inferior to improving bus service**
 - **Fact: CABR will be utilized 5 to 12 times more than an alternative bus service**

The ENGO Group letters incorrectly claim that "*the possibility of improving bus transportation*" instead of rail is a superior mass transit solution. This position ignores the fact that rail compared to bus is far more successful in encouraging mode shift from personal vehicles to mass transit in

virtually every jurisdiction in the world, whereas the bus has failed miserably in getting visitors from Calgary to Banff.

A number of private bus services already exist in addition to the public On-It Regional Transit service running on weekends and holidays in summer. Despite this, 93% of visitors to Banff arrive by personal vehicle. The same study quoted in the letters showed that utilization of bus services **within** Banff National Park reached 287,000 visitors in 2019, reflecting 7.2% of total park visitors.

Bus services between Calgary and the Bow Valley simply do not attract ridership out of personal vehicles. Consequently, passenger train service is estimated to be utilized by between 5 and 12 times more visitors to Banff than a bus service. The Calgary Bow Valley Mass Transit feasibility study quoted in the ENGO Group letters (which was updated by CIB in 2020) estimated bus ridership at 200,000 to 490,000 boardings per year in 2022 compared to the 2.4 million annual rail trips to Banff which CABR is confident it can achieve. This makes nonsense of the financial argument made in the letters. Even at the higher end of bus passenger forecasts, the annual subsidy would be approximately \$8.35 per passenger. This is nearly four times the maximum per passenger equivalent capital cost contribution requested by CABR for infrastructure which is more long lasting and offers more diverse economic and environmental benefits.

- 7. Claim: CABR requires an increase in Park gate fees to achieve ridership forecasts**
- Fact: CABR can achieve ridership forecasts with existing Park gate fees

The ENGO Group letters incorrectly claims “*The proponents claim that Parks Canada increasing personal vehicle entrance fees for Banff National Park could incentivize the CABR to reach the predicted ridership numbers. However, there is no way to confirm if this would incentivize enough riders, it would drive public funding to a private operator, and it has not been supported publicly by Parks Canada as a feasible option.*” CABR and its ridership consultants estimate capturing a 20% market share from personal vehicles to the park is achievable with the status quo gate fees as a result of the passenger benefits of rail in terms of comfort, flexibility, safety, and speed. We use an increase in gate fees as an example of the opportunity to increase the use of the train and decrease the use of personal vehicles which would further improve sustainability and lowering emissions while at the same time reducing or eliminating any financial contribution by governments.

Banff National Park is already moving towards measures which would have a similar effect, including:

- banning the use of personal vehicles to key sites (e.g. Moraine Lake)
- rationing car parking
- charging for car parking
- running intra-park shuttle bus services

- 8. Claim: CABR attractive for Airport to downtown Calgary, not downtown to Banff**
- Fact: CABR’s provides environmental, economic, and social benefits for entire route

The ENGO Group letters incorrectly claim that addressing congestion by developing mass transit is supported by the community in Calgary but not Banff: *“What might be a benefit in Calgary, such as highspeed rail transit, may negatively impact a community within a national park. For example, community expectations will differ, as well as the infrastructure required by the Town of Banff to address wildlife impacts.”* In Banff, resident polls consistently indicate that a top concern is the impact of personal vehicle congestion and, as a result, the Town has made substantial investments in mass transit, most obviously in ROAM Transit which consistently breaks ridership records.

The environmental, economic, and social benefits of CABR depend upon an integrated project providing a "one seat ride" from the Airport terminals to downtown Calgary and onward to the Bow Valley and Banff. CABR's forecasted ridership of 11.8 million passengers estimates 80% of trips will be within the City of Calgary (to which the ENGO Group can scarcely object). Of the remaining 20% of passengers who travel to Banff, about half will be leisure travelers whose higher priced tickets to travel in premium and first class effectively subsidize the economy travelers.

This multi-class fares also provides the affordable labour mobility, social, and health benefits of public transit for residents of the Bow Valley. The ENGO Group's recommendation to *"require separately assessing the community and environmental needs and impacts"* seems to demonstrate a lack of holistic thinking of which they accuse CABR. While Switzerland is only one of many examples CABR uses to illustrate its model (with the Canada Line in Vancouver being the most pertinent Canadian model), the ENGO Group appears to believe that Alberta should not aspire to the world class tourism and passenger rail experience offered by the Swiss.

9. Claim: CABR Requires development of Norquay Gondola

- Fact: CABR enhanced by, but does not require, Norquay Gondola

The ENGO Group letters incorrectly claim that CABR's benefits to Banff are dependent on the development of a potential gondola from the Train Station to Norquay. *“The ARP lays the groundwork for receiving CABR passengers in Banff and incremental development with a gondola to Mount Norquay on the north side of the tracks.³ We know from Parks Canada's previous rejection of the gondola on the grounds of the proposal pushing the limits of development, that this decision is unlikely to change with the current management plan in place. The misalignment of the gondola with the Banff National Park Management Plan suggests that it is unlikely for the whole project to come to fruition, including the benefits proposed for the Town of Banff.”*

The ARP's multi-modal transportation hub supports CABR by providing arriving train passengers with mass transit options to experience the park without the use of a personal vehicle. These options include passenger rail services and a shuttle service and micro-mobility rental centre. In addition, the ARP includes an aerial transit terminus. Should aerial transit to Norquay be developed, this would provide train passengers with another option to experience the high alpine without the use of a personal vehicle. However, while CABR and aerial transit to Norquay are complementary, the development of each is not dependent on the other.

For clarification, Parks Canada's *Mt. Norquay Site Guidelines 2011* specifies 33 times that Norquay should seek to reduce the impact on wildlife from vehicles traveling on the Norquay Access Road, with a gondola mentioned as a potential solution 9 times. In 2015, Parks Canada provided Norquay with a terms of reference for a potential gondola to Norquay. In May 2018, Norquay made its first proposal to Parks Canada. In December 2019, Parks Canada informed Norquay that it would not approve that proposal. Norquay and Parks Canada then met in 2020 and reviewed a draft of an alternative proposal with Parks providing feedback on why they did not approve the earlier proposal. In September 2022, Parks Canada confirmed in writing to the Town of Banff that Norquay is able to make a second proposal for a town to Norquay base gondola. In December 2023, Parks Canada's *What We Heard Report on their Expert Panel on Moving People Sustainably in the Banff Bow Valley* provides perspective: "All over the world new examples of aerial transit exist and solve important transportation problems. They should not be overlooked as effective ways to reduce traffic."

10. Claim: the ARP overlaps with Parks Canada's Redevelopment of the 200 block of Banff Avenue

- Fact: the ARP's multi-modal transit hub supports new Parks Canada Visitor Centre in Banff

The ENGO Group Letters incorrectly claim, "*The ARP also overlaps with Parks Canada's proposal for the Banff 200 Block Redevelopment.*" In the October 2022 announcement of the new Visitor Centre 200 Block Redevelopment of Banff Avenue, Parks Canada said the project will "*support visitor reception, orientation and education services.*" Parks Canada's stated goal for the Visitor Centre: "*This project will encourage a path to reconciliation, increased tourism and job opportunities, and inclusivity for this world-class park.*"

By creating a multi-modal transportation hub to accommodate sustainable modes of moving to and around the park including passenger rail services, a shuttle centre, aerial transit terminus and additional intercept parking, the ARP supports Parks Canada's goal of using the new Visitor Centre to encourage tourism while developing green mass transit. The new Visitor Centre's location is not able to accommodate any of the ARP's sustainable transportation options. The Town of Banff transportation policy is to develop additional intercept parking on the Town's perimeter and prohibits the provision of additional downtown visitor parking to reduce the number of vehicles traveling downtown. Thus, the Visitor Centre's downtown Banff location prevents it from providing visitor parking. Thus, Parks Canada's new Visitor Centre and the ARP are complementary by increasing tourism while reducing visitors' need for a personal vehicle.