



January 30, 2009
Our Ref.: 33015835
Ministry of the Environment

EA Project Coordination Section
Environmental Assessment and Approvals Branch
2 St. Clair Avenue West, Floor 12A
Toronto, Ontario, M4V 1L5

Attention: Catherine McLennon
Special Project Officer

Re: Detroit River International Crossing Environmental Assessment Study

Dear Ms. McLennon:

Thank you for your comments submitted in response to the Draft Environmental Assessment (EA) Report made available for public, agency and stakeholder review between Wednesday, November 12, 2008 and Friday, December 12, 2008.

Please refer to the attached table for responses to your concerns raised with respect to the Draft EA Report. As per the attached table, additional information related to these topics as well as changes in wording or clarification to existing text have been included in all relevant chapters of the Final EA Report.

If you have any questions during the formal review process, please contact Roger Ward, Senior Project Manager at the Ministry of Transportation, or the undersigned.

Again, thank you for your participation and comments.

Yours very truly,

Murray Thompson, P.Eng.
Consultant Project Manager

cc. Dave Wake, MTO
Roger Ward, MTO
Joel Foster, MTO

Encl.

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Comment	Action / Response
Received from Catherine McLennon, Special Project Office, Ministry of the Environment (Roger Ward, MTO, December 9, 2008)	
Air Reviewer – Gerald Diamond, Air Quality Analyst, Ministry of the Environment	
<p><u>Section 4.1</u> – Their description of the ministry's air monitoring in Windsor is wrong. They believe monitoring stopped in certain places when it hasn't and seem unaware of other stations altogether. Nonetheless, it is unlikely that the additional information would have made a significant difference to their conclusions.</p>	Comment addressed in the final EA Report (section text has been updated).
<p><u>Section 6.1</u> – The writers remarks that they believe that traffic will divide evenly between the new link and the Ambassador Bridge. However, given the opposition to truck traffic passing through the downtown, and past residential areas, this may not be the case. A more cautious approach would be to expect that political pressure might cause more of the truck traffic to be diverted to the new span and leave the existing bridge for lighter vehicles.</p>	The assumption of the equal split of truck traffic between the new crossing and the Ambassador Bridge was made at the "generation and evaluation of Illustrative Alternatives" phase as part of the broad level analysis. Refinement of the study area led to the generation and evaluation of Practical Alternatives, during which additional analysis was conducted to further refine the assumptions made regarding truck traffic patterns. The refined split considered more truck traffic being diverted to the new crossing, which better represents the travel demands and patterns in the study area. This refined truck traffic split was used for all analyses during and subsequent to the evaluation of the Practical Alternatives, which led to the selection of the Technically and Environmentally Preferred Alternative. (Refer to the <i>Level 2 Traffic Operations Analysis of Practical Alternatives</i> Report [December 2008] for quantitative information / analysis relating to each Practical Alternative.)
<p><u>Section 6.2</u> – The scoring table places "Changes To Air Quality" as separate from "Protection Of The Natural Environment". I am not sure I agree with this distinction. More significantly, I disagree with weighting air quality this low. Residents regularly complain about the air quality impacts of the truck traffic, especially when queued. The Ontario Medical Association continues to assert that poor air quality results in thousands of premature deaths in Ontario each year. This should not be downplayed in the interest of improving regional mobility.</p>	<p>Comment regarding the factors in the scoring table has been acknowledged. Regarding the weighting of air quality for the arithmetic evaluation, it should be noted that three weighting scenarios were used to evaluate the illustrative alternatives. Both the CCG and public weighting scenarios provided the most weight to air quality, with lower weighting given to Improve Mobility and Cost. As mentioned in Table 6.4, the air quality factor was considered of moderate importance as the majority of airborne pollutants and toxins are from industrial sources in the Windsor-Detroit area and external sources. The study team observed that by giving greater importance to protection of community and neighbourhood characteristics and protection of natural features, impacts to sensitive receivers for air quality will be reduced.</p> <p>With that said, the evaluation of illustrative alternatives was completed for the crossing/plaza alternatives based on the weighting scenarios developed by the study team, the CCG and the public. The arithmetic evaluation results for all three weighting scenarios are included in Tables 6.13 and 6.14. Although the arithmetic evaluation of feasible illustrative alternatives resulted in a slightly different ranking of the crossing alternatives among the three scenarios, the scenario results were generally consistent with one another and produced the same highest ranking alternative. The highest ranking alternative (X10) was consistent with the results of the Reasoned Argument Method and was therefore carried forward to the Area of Continued Analysis (ACA).</p> <p>The three different weighting scenarios were also used in the evaluation of practical plaza/crossing alternatives and access road alternatives. As discussed in Chapter 8, the evaluation of practical alternatives also produced the same results for each of the three ranking scenarios.</p>
<p><u>Section 6.2</u> – It is not made clear how broad brush descriptions are converted to numeric scores for the different categories. In particular there is no description of how the different air quality impacts were determined or how (presumably modelled results) were averaged to give descriptions such as "no to low impact".</p>	<p>Further clarification has been provided regarding the scoring approach and methodology.</p> <p>While air quality in localized areas could be impacted by any of the alternatives, overall air quality would not be impacted due to the large contribution from transboundary and other sources and the limited range of impact from a traffic corridor. In this stage of analysis, the focus was on the regional burden. Analysis for all of the alternatives was done using a burden analysis of total loading to the airshed.</p>
<p><u>Section 7</u> – They state that "...in recent years the number of fully operational [air monitoring] stations has been reduced to two." This is incorrect.</p>	Comment addressed in the final EA Report (see Section 7.1 – Ambient Monitoring Data).
<p><u>Section 7</u> – The tables summarising the air monitoring are vague in places. While 1 and 24 hour maxima are self explanatory, it is not clear if the average and 90th percentile rows refer to hourly or daily values.</p> <p>I disagree with the choice of the 90th percentile as representing background, especially for particulate. Choosing this level in any given year sti11means there are about 36 days or 876 hours where the ambient concentration is higher. In addition, these are not randomly distributed but rather occur preferentially during the summer.</p>	90 th percentile concentrations for background were identified as suitable in the <i>Air Quality Work Plan</i> (March 2006) which was circulated to various agencies including MOE and approved in 2006.
<p><u>Tables on pages 8-16-8.19</u> – In section 6, a detailed rationale was set out for the weighting. These were equated to the various "level[s] of importance" (see page 6-19). However in these tables three different weighting sets are used. While they are ascribed to different sources, it is not clear how the other two were used, how the "community consultation" differs from the "public" or if they were given equal consideration with the MTO weighting.</p> <p>There does not seem to be much information on how the un-weighted scores were derived.</p> <p>It would be easier to reconcile these tables if the rationale for the weightings were closer to the tables.</p> <p>Looking strictly at the two environmental factors and using the relative weightings given, the scores suggest the following.</p> <p>From the Study Team's evaluation either Crossing C + Plaza C is the preferred choice. This is also the preferred choice for both the "public weighting" and "community consultation" weightings.</p> <p>The scoring also seems a bit peculiar. Most of the scenarios describe the air quality changes as "slight increases" or "increases with 250 m". In spite of this there are no scores above 2. Given that "improve regional mobility" scores reach 7, this suggests that the impacts to air quality are much worse than the description suggests or that they are downplaying environmental concerns.</p>	Comment addressed in the final EA Report (Tables 8.5 to 8.7 have been revised according to the <i>Generation and Assessment of Practical Alternatives and Selection of the Technically and Environmentally Preferred Alternative – Plaza and Crossing Alternatives Report</i> [December 2008]).
<p><u>Section 10</u> – The results are very qualitative. Several documents for the preferred alternative are described as pending. More detail will be necessary for the final version of this document.</p>	All supporting documents referenced throughout the final EA Report have been made available electronically on the study website (www.partnershipborderstudy.com). Hard copies of the reports are available from URS Canada upon request.

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Comment	Action / Response
<u>Surface Water Reviewer – Scott Abernethy, Surface Water Evaluator, Ministry of the Environment</u>	
<p>The reports should explicitly identify the need for MOE approvals under the Ontario Water Resources Act for water quantity (water-taking permit) and water quality (sewage works approval). MTO projects are exempt from storm sewage works approvals under the Public Transportation and Highway Improvement Act, but MTO is not the proponent in this case. The reports discuss the potential need for construction de-watering and for stream diversion, activities which would trigger water-taking permit requirements for water flow daily rates greater than 50 cubic metres. Hydrogen sulphide and any other contaminants present in ground water may require an OWRA-approved treatment system before discharge to a watercourse.</p>	<p>Additional approval requirements including water-taking permits for the below-grade highway section have been incorporated into Section 10.4.8 (comment addressed in the final EA Report).</p> <p>To clarify, MTO and Transport Canada are co-proponents for the undertaking. MTO is the proponent of the Windsor-Essex Parkway and we assume are exempt from storm sewage works approvals under the Public Transportation and Highway Improvement Act.</p> <p>Commitments regarding treatment of H₂S have been incorporated into Section 10.4.8 (comment addressed in the final EA Report).</p>
<p>Containment for spill control is the primary storm water quality concern for the truck staging area or plaza. A pond discharge shut-off valve, as mentioned in the reports, is a logical part of an overall strategy for spill control.</p>	<p>The spill control strategy has been incorporated into Section 10.4.9 (comment addressed in the final EA Report).</p>
<p>The proposal for nine stormwater ponds means that the drainage area supporting each pond is generally less than the preferred criterion (10 ha) and also less than the minimum criterion (5 hectares) based on MOE's Stormwater Manual (2003). Opportunities to reduce the number of ponds by combining drainage areas should be explored so drainage areas meet the criteria.</p>	<p>The stormwater management wetponds have been designed in accordance to the MOE document "Stormwater Management Planning and Design Manual" dated 2003. Table 4.1 of the document states that for drainage areas greater than 5.0 ha, a wetpond can be used to provide stormwater management treatments. Therefore, the stormwater management treatments provided included all proposed wetponds having a drainage area greater than 5.0 ha of combined highway road surface and grassed embankments.</p> <p>Unfortunately, the profile of the highway does not allow for fewer wetponds than proposed. The number of ponds has been based on roadway runoff being pumped to the surface from the profile low-points.</p>
<p><u>Page 12</u> of the stormwater plan mentions the enclosure of Wolfe Drain as a possibility. MOE views the burial of a watercourse as an adverse effect under the Environmental Protection Act.</p>	<p>The Wolfe and Cahill Drains will not be enclosed. This was not carried forward from the Practical Alternatives stage to the Recommended Plan. Refer to text in Chapters 9 and 10.</p>
<p><u>Page 16</u> of the stormwater plan alludes to the implementation of unspecified controls to limit the recognized damaging environmental impacts of chloride from road salt. De-icing alternatives to road salt should be investigated within the scope of the EA</p>	<p>Comment addressed in the final EA Report. Commitments to investigate and review de-icing alternatives in subsequent design phases have been incorporated into Section 10.4.9.</p>
<p>The EA should commit to or propose an environmental monitoring program to show that the construction and operation of the project does not degrade water quality and it should propose contingency measures to rectify any degradation which is identified based on monitoring data.</p>	<p>Comment addressed in the final EA Report. A commitment to assess the need for a future monitoring plan during subsequent design stages has been incorporated into Section 10.4.9.</p>
<p>The storm water management plan for the bridge crossing would be prepared as a separate study. If this study is part of the EA it should be reviewed by MOE so a complete assessment can be provided.</p>	<p>Comment addressed in the final EA Report. Text regarding the Stormwater Management Plan for the crossing has been incorporated into Section 9.1.5.</p>
<u>Groundwater Reviewer – Jeff Markle, Hydrogeologist, Technical Support Section, Ministry of the Environment</u>	
<p>The area around the proposed project is characterized by approximate 20 to 35 m of overburden overlying bedrock. The overburden comprises 1 to 4 m of fill associated with industrial and urban development, mainly underlain by thick deposits of silty clay. The water table within the overburden is generally between 1 and 3 m below the ground surface (bgs) and groundwater within the bedrock is under artesian pressures in some areas. As a result of the high water table and artesian pressures, construction of elements of the approach corridor (tunnels and under passes) and inspection plaza may require dewatering. Where the dewatering will require pumping of more than 50,000 litres per day (Lpd) a Permit to Take water will be required. Evaluation of the potential impacts of the water taking should consider the guidance provided in the Permit To Take Water (PTTW) Manual, Ministry of the Environment, April 2005, and Technical Guidance Document for Hydrogeological Studies in Support of Category 3 Applications for Permit to Take Water, Ministry of the Environment, April 2008. In some cases (ie. tunnels), permanent dewatering may be required. The potential effects of such activities must be addressed.</p> <p>The Waste and Waste Management report identifies several areas of known contamination, including closed landfills, on or near lands within the areas of the proposed approach corridor and inspection plaza. As well, former industrial lands within these areas are present and it is possible that contamination, associated with past land use, is present. Given that the proposed approach corridors and plazas are in or near former industrial areas and several known contaminated sites have been identified, any permit application must also consider the potential for the water taking to mobilize contaminants that are both on-site and adjacent to the proposed works. This potential for mobilizing contaminants is acknowledged on page 23 of the Waste and Waste Management Report. Where contaminated soils and material are encountered the procedures outlined in the May 2008 Waste and Waste Management document should be followed.</p> <p>The groundwater in the area reportedly has high concentrations of hydrogen sulphide. Where the proposed discharge for a water taking is to a stream or wetland, the potential impacts of the hydrogen sulphide on the receiver should be addressed.</p>	<p>Comment addressed in the final EA Report. Text regarding the groundwater existing conditions has been incorporated into Chapter 7.</p> <p>Comment addressed in the final EA Report. Text has been incorporated into a new section (Section 10.4.8) regarding dewatering, permits to take water, and contamination mobilization.</p>
Received from Catherine McLennon, Special Project Office, Ministry of the Environment (Roger Ward, MTO, December 11, 2008)	
<u>General Comments</u>	
<p>1. The final EA should also be available on CD.</p>	<p>The final EA Report and supporting documents is available on CD. In addition, all supporting documents referenced throughout the final EA Report have been made available electronically on the study website (www.partnershipborderstudy.com). Hard copies of reports are available from URS Canada upon request.</p>
<p>2. EA Code of Practice requirements (document available at: http://www.ene.gov.on.ca/envision/env_reg/er/documents/2008/010-1259a.pdf) a) Include in the final EA a tabular summary of Terms of Reference commitments and where in the EA they are discussed (see section 4.3.3 of</p>	<p>The final EA Report includes a tabular summary of Terms of Reference commitments, and their location in the EA Report (refer to Section 1.5)</p>

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Comment	Action / Response
Code of Practice). b) Include in the final EA a tabular summary of EA commitments, where in the EA they were made and generally when they will be fulfilled (see section 4.3.5 of Code of Practice).	
<u>Specific Comments</u>	
1. Page A-1 – Environmental Assessment Act approval, if given, would apply only to the Ministry of Transportation (MTO) and the portion of the undertaking under provincial jurisdiction. Make that clear here and when describing the undertaking for which MTO is seeking approval.	Comment addressed in the final EA Report (see Page A-1).
2. Page A-2 – The amending procedure is a standard one that MTO uses for individual EAs. The Ministry of the Environment (MOE) is currently working with MTO on potential changes to the MTO Class EA, including the chapter 10 amending procedure. As a result of that work, further comments on this section may be made at the final EA stage. For now, include in section A.2 the requirement for MOE oversight/involvement regarding determination of significance of proposed changes.	Comment noted.
3. Page 1-5, OEAA process products a) First Agency & Public Review – should be a 7 week review period (was 8 weeks because submission was previously expected just before Christmas). b) MOE will take some time after the “MOE Prepares Review” stage to translate the Review into French as the undertaking is proposed for an area to which the French Language Services Act applies (Essex County, City of Windsor). c) Remove the * from the 2nd “Agency & Public Review” and “Minister’s Decision” periods.	a) Comment addressed in the final EA Report (see Exhibit 1.2). b) Comment addressed in the final EA Report (see Exhibit 1.2). c) Comment addressed in the final EA Report (see Exhibit 1.2).
4. Page 3-22, section 3.6 a) Can a comment and response summary be provided much like for the open house summaries? b) It is stated that 12 meetings have been held with the First Nations. Other than Walpole Island, with which other community(ies) were meetings held?	a) Comment addressed in the final EA Report. A First Nations Meeting Minute summary table has been incorporated in Section 3.6 . b) Comment addressed in the final EA Report. A First Nations Meeting Minute summary table has been incorporated in Section 3.6 . Of the 12 meetings, the initial meeting was held with several First Nations communities to introduce the DRIC study. However, the remaining 11 meetings were held with Walpole Island First Nations. As discussed in the text, early in the study, WIFN demonstrated a desire to actively participate in the study, and the study team continued to consult directly with them. In addition however, each First Nation group identified in Section 3.6 of the final EA Report was invited to comment on study materials at each key milestone of the study. All First Nations groups were notified of the DRIC study via a study commencement package and received follow-up phone calls / letters. In addition, mailing notices were also sent to each group prior to Public Information Open Houses and workshops.
5. Page 4-3, section 4.2.1 – To be consistent with other sections in chapter 4, consider adding some data to this section rather than just referring the reader to the supporting document.	Additional data has not been added to this section of the final EA Report as there is limited information available with regard to existing conditions within the Preliminary Analysis Area; however, an in depth economic analysis was conducted within the refined Area of Continued Analysis. Information presented in Chapter 4 represents the study team’s available information regarding existing conditions within the PAA.
6. Page 4-3, section 4.2.2 – The trend illustrated in table 4.2 starts in 2001, not mid-1990’s as the text preceding the table suggests.	Comment addressed in the final EA Report (text preceding the table has been updated).
7. Page 4-24, section 4.6.3 – Where is the detailed information for Vegetation and Vegetation Communities located? Other sections present more information then refer the reader to supporting documentation.	Comment addressed in the final EA Report (referred reader to <i>Environmental Overview Paper – Canadian Existing Conditions Volume 2</i>).
8. Page 4-28 – The text on the map is difficult to read. This comment applies to several other Exhibits as well.	Comment addressed in the final EA Report (higher quality figures have been inserted).
9. Page 4-29 – What do the blank columns in the table mean?	Comment addressed in the final EA Report – “n/a” added to all blank cells. Table 4.6 presents a summary of environmentally significant areas located in the PAA. The criteria used to evaluate the significance of a natural heritage area, and hence determine if the natural heritage area should be designated, are presented in the columns. The table cell is left blank if the evaluation criteria do not apply to the natural heritage area under consideration. The size of the environmentally significant area was provided if this information was readily available.
10. Page 5-5, Table 5.4 – How is “future” defined? What is the reason for there being no difference between 2004 and future statistics for cars?	Comment addressed/clarified in the final EA Report (additional text describing 2004 and future participation rates have been incorporated into the final EA Report).
11. Page 6-1 a) 3rd paragraph – Reference should be made to Exhibit 6.17 not 6.16 b) Last set of bullets on the page – Where in the Terms of Reference are these objectives identified?	a) Comment addressed in the final EA Report (updated figure number) b) These objectives are identified in Section 3.3.1 of the EA TOR (Refer to EA TOR [May 2004] page 33). Reference has been added to this section of the final EA Report.
12. Page 6-8 – How do the areas in the four columns match up to East Plaza, Central Plaza and South Plaza sites?	Comment addressed in the final EA Report (note added in table).
13. Page 6-9 – Zug Island is not identifiable on Exhibit 6.6 (or Exhibits 6.2 or 6.11).	Comment addressed in the final EA Report (added to map).
14. Page 6-18 – Should the numbers in the last column for performance measures “Parklands” and “Archaeological Sites” be reversed?	Comment addressed in the final EA Report (corresponding criteria reference in EA TOR Table 3.4 has been updated accordingly for each performance measure category).
15. Page 6-20 – In the end, are the public and other interested persons (i.e. Community Consultation Group) in general agreement with the factor weightings?	Separate weighting scenarios were developed and considered by the study team to allow for differing views on the relative importance of environmental factors. The weighting scenarios developed by the public and the CCG were in general agreement with that developed by the study team, with the public and CCG giving slightly higher weighting to Air Quality and lower weighting to Improve Mobility and Cost. The three weighting scenarios and results of the arithmetic evaluation of illustrative crossing/plaza alternatives based on each scenario are summarized in Tables 6.13 and 6.14 . Even with the slight differences in the weighting scenarios that were used, the results of the evaluation were generally the same for each scenario.
16. Page 6-24 – Is it CC-CF-SM that is the preferred route segment? Discussion on page 6-21 seems to suggest that.	Comment addressed in the final EA Report (text in table has been revised accordingly).
17. Page 6-26 – Where is the tabular assessment of X13 and X14 (to be consistent with how other crossing information presented)?	Crossing X13 (DRTP Proposal) includes a new truck route and enlarging of the existing twin-tube rail tunnel for use as a two-lane truckway. While an assessment of

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	<p>the impacts of the crossing was completed, the proposal does not provide sufficient capacity to meet the long-term travel demand at the Windsor-Detroit crossing, which is a major objective of this study, and has high community impacts on the Canadian side. It was recommended that this option be eliminated from further consideration in this study, and as such a tabular survey has not been provided.</p> <p>Crossing X14 was generated as a full 6-lane crossing alternative at approximately the same location as Crossing X13 and was evaluated. A tabular survey of the results of the analysis of Crossing X14 is provided in Table 6.12 of the final EA Report. This alternative was not carried forward due to high impacts to communities and neighbourhoods in central and south Windsor.</p> <p>A complete description of the evaluation of X13 and X14 is also available in the <i>Generation and Assessment of Illustrative Alternatives Report</i> (November 2005).</p>
<p>18. Pages 6-29 and 6-33</p> <p>a) It is not immediately clear how the text description in the bullets at the top of page 6-29 match up with the columns in the table on page 6-33. The columns do not appear to be in the same order as the bullets. Being consistent here and then in the discussion that follows is important since the alternatives have similar names. Providing route segment information may help.</p> <p>b) The conclusion on page 6-29 about "Impact to Community and Neighbourhood Characteristics" does not appear to coincide with the information on page 6-33. Based on the information on page 6-33 alone, it appears that Huron Church (HCR)/Talbot corridor will have a greater impact than the Talbot Road by-pass (35 more houses and 20 more businesses displaced; disruptions about the same).</p> <p>c) 2nd column of text on page 6-29 – paragraph 1 should say 45 businesses displaced; paragraph 2 should say 25 businesses impacted (to match page 6-33)</p> <p>d) 2nd column, paragraph 3 on page 6-29 – Should it be within "200" metres of centre line, not 250 metres (to match page 6-33)</p> <p>e) 2nd column, paragraph 3 on page 6-29 – The 1370 households referenced here for Huron Church/Talbot Road corresponds to the last column in the table on page 6-33. Is the discussion on page 6-29 meant to relate to the last column? The question is asked as previously in the last paragraph in the 1st column on page 6-29, Huron Church/Talbot Road matched column one in the table on page 6-33.</p> <p>f) 2nd column, paragraph 3 on page 6-29 – For ECR/Rail Corridor, disrupted households is 1370 but according to page 6-33 it is 1890.</p>	<p>a) Comment addressed in the final EA Report (bullet points revised to reflect table, also provided title in text to clarify segment).</p> <p>b) Comment addressed in the final EA Report (updated text for clarity).</p> <p>c) Comments addressed in the final EA Report (section text updated to reflect table).</p> <p>d) Comments addressed in the final EA Report (section text updated to reflect table).</p> <p>e) Comment addressed in the final EA Report (section text updated).</p> <p>f) Comment addressed in the final EA Report (section text updated).</p>
<p>19. Page 6-31 and 6-33</p> <p>a. "Impacts to Natural Environment" discussion, last paragraph, page 6-31 – Only one alternative appears to sever natural areas (route in last column in table on page 6-33). From the information on page 6-33, no far superior alternative seems to emerge as argued on page 6-31.</p>	<p>Comments addressed in the final EA Report (section text updated).</p>
<p>20. Page 6-34 – Where is the tabular summary of the information presented on this page (to be consistent with how other crossing information presented)?</p>	<p>As noted under Comment 17 above, Crossing X13 does not provide sufficient capacity to meet the long-term travel demand at the Windsor-Detroit crossing, which is a major objective of this study, and has high community impacts on the Canadian side. It was recommended that this option be eliminated from further consideration in this study, and as such a tabular summary has not been provided.</p> <p>Crossing X14 was generated as a full 6-lane crossing alternative at approximately the same location as Crossing X13 and was evaluated. A tabular survey of the results of the analysis of Crossing X14 is provided in Table 6.12 of the final EA Report. This alternative was not carried forward due to high impacts to communities and neighbourhoods in central and south Windsor.</p> <p>A complete description of the evaluation of X13 and X14 is also available in the <i>Generation and Assessment of Illustrative Alternatives Report</i> (November 2005).</p>
<p>21. Page 6-37</p> <p>a) The decision rules (i.e. how an alternative is eliminated from or kept in the analysis) should be stated before the analysis begins. For example, in the paragraph directly under "Weighted Scores", it mentions decision rules. That should be expanded and brought up front (i.e. before getting into the Reasoned Argument Discussion). This will lend to the traceability of the ensuing discussion.</p> <p>b) The paragraph at the end of the 1st column of text on the page seems out of place. Should the conclusion about the area of continued study not come after the arithmetic method evaluation (at the end of page 6-41 for example)?</p> <p>c) It appears from the third paragraph under unweighted scores that "reasoning" was applied to the arithmetic method evaluation and resulted in the elimination of alternatives. Should this occur given that the arithmetic method is strictly a numbers exercise? If reasoning is to be applied, then this must be made clear in the decision rules.</p>	<p>a) Comment addressed in the final EA Report (section text updated, see Section 6.3.2 introductory paragraph).</p> <p>b) Comment addressed in the final EA Report (section text updated).</p> <p>c) To clarify, the statement included in the third paragraph is not meant to imply that reasoning has been introduced. Rather, the alternatives were screened on the basis that they do not meet the objectives of the Partnership, and thus should not be considered as reasonable alternatives. No changes to the EA Report have been made.</p>
<p>22. Page 6-38 – How is high, moderate, and low impacts determined? A brief explanation should be included in the EA.</p>	<p>Comment addressed in the final EA Report (see Section 6.3.2 – Reasoned Argument Method).</p>
<p>23. Page 6-41 – How were the scores in Table 6-13 determined. Checking chapter 3 as the last paragraph on page 6-37 states does not provide the requisite information. A brief explanation should be included in the EA.</p>	<p>Comment addressed in the final EA Report (Table 6.13 has been inserted in addition to the summary table).</p>
<p>24. Page 6-46, section 6.5.2 – As X12 is the "twinning" of the Ambassador Bridge (i.e. constructing a new bridge proximate to the existing), the statement at the end of the 1st paragraph that this alternative would not provide a new crossing does not make sense.</p>	<p>Comment addressed in the final EA Report (section text updated).</p>
<p>25. Page 6-47, section 6.6</p> <p>a) End of 1st paragraph states "from Broadway Avenue to Brock Street in Sandwich Towne" – these areas are not evident on Exhibit 6.17.</p> <p>b) According to Exhibit 6.15 on page 6-41, CC1 and CC4 are also in the Area of Continued Analysis (ACA). The 2nd paragraph in section 6.6 does not reflect this.</p>	<p>a) Comment addressed in the final EA Report (referenced areas of ACA evident on exhibit)</p> <p>b) Exhibit 6.15 does not illustrate the ACA, however, Exhibit 6.17 does. CC1 and CC4 are not in the ACA.</p>
<p>26. Page 7-8, section 7.2.1 – There appears to be a truncated discussion about noise effects. More detail is needed for the EA. ROW is mentioned in the 1st paragraph on the page, how does that relate to the ACA or the Area of Investigation?</p>	<p>Comment addressed in the final EA Report (section text updated).</p>

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Comment	Action / Response
27. Pages 7-12 to 7-30 – Exhibit 7-11 is referenced incorrectly numerous times on these pages.	Comment addressed in the final EA Report (updated figure number).
28. Pages 7-19 and 7-20 – Why is there a discussion of businesses in this section of the document? The information is somewhat repeated in section 7.2.3 where it likely belongs.	Businesses are discussed here in terms of the impact on the community of businesses being displaced. No changes to the EA Report have been made.
29. Page 7-20, Social Features – The Exhibit should be labelled Exhibit 7.7 not 7.13.	Comment addressed in the final EA Report (updated figure number).
30. Page 7-25 – The paragraph above Exhibit 7.8 does not relate to delivery of emergency services.	Comment noted. This section was intended to identify the delivery of emergency and community services that currently exist within the Area of Continued Analysis.
31. Pages 7-25 and 7-26, section 7.2.3 – Is there a reason for limited detail being offered for economic conditions compared to other parts of the environment?	The objective of the economic impact assessment is to assess the economic impacts to the businesses along the proposed access road and within the proposed border plaza-crossing locations, as well as to provide a general assessment of the business and economic impacts outside of the ACA and to the regional and provincial economies. No changes to the EA Report have been made.
32. Page 7-38 – What is the difference between ASI and URS in table 7.12 and also 7.13 on page 7-40?	Comment addressed in the final EA Report (updated headings from who investigated to when investigations were conducted).
33. Page 7-49, section 7.5.3 – The reference in paragraph 2 should be to Exhibit 7.27.	Comment addressed in the final EA Report (updated figure number).
34. Page 8-9 – When and how were the measures for the various evaluation factors developed? Disruption was not used as a measure. Previous analyses used both displacement (acquisition) and disruption.	In the illustrative alternatives stage, disruption to residents in the social impact assessment was considered at a broader level as having nuisance impacts to residents within 200 m of centreline. However, in the practical alternatives stage, disruption to residents was considered using more specific studies related to nuisance impacts (i.e. the air quality impact assessment and the noise and vibration impact assessment). Thus, disruption to residents in the practical alternatives stage was not considered directly as a social impact. No changes to the EA Report have been made.
35. Page 8-11, Summary discussion – Broadway Street not mentioned previously. What are some of the indirect and nuisance effects expected?	Comment addressed in the final EA Report (see Table 8.2).
36. Page 8-13, Summary discussion a) It is stated that the differences in air quality between Plaza B and C are notable. This is not evident from page 8-12 where the exact same information is given for air quality of both plazas. b) The last sentence in the summary about cost being considered of greater importance than impacts to natural features contradicts the ranking provided at the outset that ranked protecting the natural environment (rating 90) higher than cost and constructability (rating 75).	a) Comment addressed in the final EA Report (to reflect text on Pages 8 to 12). b) Comment addressed in the final EA Report (text in table has been revised accordingly).
37. Page 8-15, Summary discussion – Cost and constructability issues with Crossing C- Plaza B should be mentioned in the summary on Page 8 to 13 as it is relevant there as well (discussion in cost and constructability row also different for the exact same alternative).	Comment addressed in the final EA Report (text in table has been revised accordingly).
38. Pages 8-16 to 8-20 – The way in which the information is presented in the tables is different than the way similar information is presented in table 6.13 on page 6-41. The same question applies about how the numbers were determined (see also comment 23 above). Provide a brief explanation with the tables in the EA.	Comment addressed in the final EA Report (format of Chapter 8 tables transferred to Chapter 6).
39. Page 8-21 a) As this section presents a bi-national evaluation, more information is required about the US side for “Community and Neighbourhood Characteristics” and “Natural Features” (for crossings X-10A and X-10B). b) In the “Existing and Planned Land Use” discussion, reference is made in the third paragraph to Crossing X-10. Is that X-10A or X-10B or both?	a) Comment address in the final EA Report (section text updated). b) Comment addressed in the final EA Report (section text updated from X-10 to X-10A and X-10B).
40. Page 8-26 – In the opening sentence, reference should be to Exhibits 8.7 to 8.11. In the last sentence, reference should be to Exhibit 8.12.	Comment addressed in the final EA Report (Exhibit references updated in text).
41. Page 10-1 – The last three documents in the bulleted list are marked draft. Will they be finalized?	Comment addressed in the final EA Report. All reports prepared to support the initial stages of the study are referenced as draft reports, or the information provided represented the available information at the time. Further analysis of the Recommended Plan has been documented in updated technical reports and memorandums that were finalized prior to submission the EA Report, and this information was included in the final EA Report.
42. Section 10 – Much of the information in this section presents conclusions but not the detailed technical studies from which the conclusions were drawn. As these technical studies were not provided with the draft EA, comments on this section will be reserved until the final EA and the technical studies are submitted. In the final EA, reference the technical studies that led to the conclusions within each subsection so the reader knows exactly where to go to find more detailed information.	Comment noted.