



February 6, 2009  
*Our Ref.: 33015835*

Transport 2000 Ontario  
43 English Ivyway  
Toronto, ON, M2H 3M3

Attention: Natalie Litwin, President

**Re: Detroit River International Crossing Environmental Assessment Study**

Dear Ms. Litwin:

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.

The DRIC study team notes your comments regarding the recent economic downturn, your concern with the road-based solution identified in the EA Report, potential alternatives to address the transportation problems including rail and transit options, and your concern with the use of traffic predictions that are no longer valid. In addition, the study team notes that the submission from [REDACTED] has been received and that you wish for us to consider his comments to be from Transport 2000 Ontario as well. The study team have reviewed the comments and provided a response directly to [REDACTED], and note that the information provided in his response letter is also included below.

### **Economic Downturn**

Regarding your concern with the recent economic downturn that has impacted the manufacturing sector and reduced truck movements over the Ambassador Bridge, we note that the traffic projections used for the DRIC EA are documented in the Travel Demand Forecasts Working Paper, September 2005. The commercial vehicle forecasts in this report were based on Government of Canada trade projections by major commodity group, thereby capturing the different cross-border markets and associated travel characteristics to assess future commercial vehicle demand.

The forecasts were based on reasonable assumptions using the most current information available at the time, with extensive review and scrutiny by modeling experts from the Partnership agencies. This forecasting approach addressed future uncertainty through extensive sensitivity analyses, which capture a realistic range in the forecasts. The low growth scenario was intended to reflect much lower levels of demand which could be brought about by a variety of circumstances including low economic growth, currency exchange rates, the Western Hemisphere Travel Initiative, City of Windsor or provincial non-smoking initiatives, fuel prices and other such factors. Similarly, high growth scenarios were tested to determine the upside potential in cross-border demand based on more optimistic, yet reasonable growth assumptions.

Since the forecasts were completed, there have been declines in cross border passenger car traffic (see **Exhibit 5.1.C** of the final EA Report). Truck traffic remained fairly stable between 2001 and 2007 (see **Exhibit 5.1.D** of the

URS Canada Inc.  
75 Commerce Valley Drive East  
Markham, ON Canada L3T 7N9  
Tel: 905.882.4401  
Fax: 905.882.4399  
[www.urs.ca](http://www.urs.ca)

final EA Report) and in fact 2006 represented the peak in commercial vehicle traffic at the Ambassador Bridge. The recent declines in truck and passenger car trips across the border as a result of the recent economic downturn would indicate that the volumes are tending towards the lower range of the forecasts (see **Exhibit 5.1.E** of the final EA Report). Assuming a modest economic recovery over the long-term, the existing crossing facilities will reach their practical capacity within the planning horizon.

### **Mode Choice and Alternative Transportation Options**

With regard to Transport 2000 Ontario and [REDACTED] comments relating to mode choice and the range of options considered for a new highway crossing of the Detroit River, we refer back to the Planning/Need and Feasibility Report (P/NF) commissioned in 2001 by the Canada-U.S.-Ontario-Michigan Border Transportation Partnership (the Partnership). The purpose of the P/NF was to identify a long-term strategy to address the safe and efficient movement of people and goods between Southwestern Ontario and Southeastern Michigan.

The P/NF Study, completed in January 2004, identified a 30-year strategy for improvements to address the medium and long-term (2030 and beyond) needs of the transportation network serving cross-border traffic in the area of Southwestern Ontario and Southeastern Michigan. The improvement strategy included four major elements to address the medium and long-term needs of the transportation network. The four major elements were:

- Improvements to Border Processing
- New/Expanded International Crossing
- Optimize Use of Existing Network; and,
- Travel Demand Management

A total of 17 individual strategies were identified as part of the recommended improvements. A number of the strategies that were recommended were similar to the suggestions in your letter, including encouraging greater use of intermodal rail, providing support to improvements of rail terminals, encouraging and supporting improvements to both transit services and inter-city passenger rail, and encouraging greater use of ferry services. However, while the P/NF identified that improvements to rail and transit services may improve utilization of the network, the results of the study indicated that these improvements alone will not reduce the need for a new crossing and other road-based improvements.

As a result of the recommendations and confirmed need for a new or expanded crossing of the Detroit River with connections to the freeway systems in Ontario and Michigan, the Partnership initiated a formal environmental assessment process for a new or expanded Detroit River International Crossing (the current study). The overall purpose of the study has been to provide for the safe, efficient and secure movement of people and goods across the Canadian-U.S. border in the Detroit River area to support the economies of Ontario, Michigan, Canada and the U.S. As discussed in Chapter 5 of the EA Report, a wide range of Alternatives to the Undertaking were considered as part of the EA Study to address the stated transportation problems and meet the purpose of the undertaking. The alternatives that were considered were based on the findings of the P/NF study, and included the following:

- Do Nothing;
- Improvements to border processing;
- Transportation demand management;
- Transportation systems management;

- New and/or improved rail alternatives including a new and/or expanded international rail crossing;
- New and/or improved transit services;
- New and/or improved marine services;
- New and/or improved road alternatives with a new or expanded international road crossing; and
- Combinations of the above.

The assessment of transportation planning alternatives provided an opportunity to examine fundamentally different ways of addressing transportation problems. In recognition of these fundamental differences among the planning alternatives, it was considered appropriate to assess the effectiveness of each type of alternative in addressing the problems and taking advantage of opportunities at a functional level. For further details on the Alternatives to the Undertaking that were considered, please refer to the Draft Feasible Transportation Alternatives (Alternatives to the Undertaking) Report, February 2006.

#### *New and/or Improved Rail Alternatives*

Regarding the alternative of providing new and/or improved rail alternatives to address the transportation problems, it is noted that the capacity of the existing rail network has been determined to be sufficient to meet the long-term projected (2035) needs of rail transport.

A scenario involving significant diversion of freight to intermodal rail through major investments and transportation policies was considered and is documented in the Travel Demand Forecast Working Paper, September 2005. That paper concludes that, even under such an optimistic diversion scenario, rail improvements would defer, but not eliminate the need for improvements to the transportation network. This alternative would therefore only marginally improve congestion on the road-based transportation network.

Delays and queuing on the road network would continue to occur and gradually worsen as traffic volumes increased. Such delays and queuing on the road-based network of this international trade corridor are not consistent with governmental planning objectives or tourism objectives. Similarly, improvements to rail would only partially address border processing needs. Improvements to rail may assist in the processing of freight traffic, but would have little benefit to truck and passenger vehicle inspection processes on the road network.

#### *New and/or Improved Transit Service*

The EA Study also reviewed the possibility of providing new and/or improved transit service to address the identified transportation needs of the area. While it is recognized that transit improvements could be implemented at a reasonable cost and in a relatively short timeframe, delays and queuing on the road-based network would result even with the transit service improvements. This result is not consistent with planning or tourism objectives. Similarly, improvements to transit services would only partially address border processing needs (i.e. transit improvements would only address passenger travel).

The alternative of providing new and/or improved roads with a new and/or improved crossing was identified as the most effective at addressing the transportation network requirements, border processing requirements, and provides the highest overall level of support to planning and tourism objectives. It is also recognized that improved and expanded border processing capacity is an integral component of this solution.



In terms of addressing transportation network requirements for people and goods movement, the EA Report notes that a multi-modal approach provides choice for travellers and offers viable mechanisms to reduce auto use. It is recommended that these alternatives be included as part a multi-modal strategy to meet the medium and long-term needs of the transportation network in the area. However, alternatives for travel demand management, rail, transit, ferries, etc., cannot independently address the diverse user needs, sufficiently alleviate traffic congestion on the transportation network or effectively provide reasonable options for maintaining the movement of people and goods in cases of disruptions at any of the existing border crossings. As such, alternatives involving rail and/or improved transit services were not carried forward to either the illustrative or practical alternatives stage of the study.

With regard to the comment that the building of the DRIC highway project may necessitate widening Highway 401 the entire distance between Windsor and Toronto, please note that it has been the ongoing intent of the Ontario Ministry of Transportation to widen Highway 401 to a minimum of 6 lanes (3 lanes in either direction) between Windsor and Toronto.

The Environmental Assessment Report which reflects comments received from all stakeholders during the review period noted above was filed with the Ontario Ministry of the Environment (MOE) on December 31, 2008. This report has also been circulated to external stakeholders including relevant agencies, municipalities, and First Nations, and has been made available for public review at a number of review locations within the study area (refer to enclosed *Notice of Submission of Ontario Environmental Assessment*). Anyone wishing to provide comments on the EA Report must submit their comments in writing and/or by fax to the Ministry of the Environment by **Friday February 27, 2009**. All comments must be submitted to:

**Catherine McLennon, Special Project Officer**  
**Ministry of the Environment**  
EA Project Coordination Section  
Environmental Assessment and Approvals Branch  
2 St. Clair Avenue West, Floor 12A  
Toronto, Ontario, M4V 1L5  
Tel: 416-314-7222/1-800-461-6290  
Fax: 416-314-8452

During future design stages, the Partnership will continue to consult with the public on the various aspects of the DRIC Study. Stakeholders identified on our contact lists (including yourself) will be advised of upcoming events.

If you have any further comments or require additional information, please feel free to contact us through the project website at [www.partnershipborderstudy.com](http://www.partnershipborderstudy.com), or by calling the Project Toll Free number at 1-800-900-2649.

Again, thank you for your participation and comments.



Yours very truly,

A handwritten signature in black ink, appearing to read "Murray Thompson", is written over a thin vertical red line.

Murray Thompson, P.Eng.  
Consultant Project Manager

cc. Catherine McLennon, MOE  
Dave Wake, MTO  
Roger Ward, MTO  
Joel Foster, MTO

Encl.