

Brian Masse
Member of Parliament
(Windsor West)



HOUSE OF COMMONS
CHAMBRE DES COMMUNES
CANADA

Ottawa
Room 100 La Promenade Building
Ottawa, Ontario Canada, K1A 0A6
Tel.: 613-996-1541
Fax: 613-992-5397

April 22, 2015

Mary Johnson
Transport Canada
Place de Ville, Tower C
330 Sparks Street
Ottawa, ON
K1A 0N5

Windsor
1398 Ouellette, Suite 2
Windsor, Ontario, N8X 1J8
Tel.: 519-255-1631
Fax: 519-255-7913

RE: AMBASSADOR BRIDGE ENHANCEMENT PROJECT

Dear Ms. Johnson,

I am writing today to reiterate my on-going opposition to the proposed Ambassador Bridge Enhancement Project (ABEP). I have represented the area where the Ambassador Bridge is located at the municipal level as a City Councillor and now for the last 13 years the federal Member of Parliament for Windsor West. For several years now I have served as the Official Opposition Critic for the Canada-US Border. As a result I have a keen understanding of our border issues and a strong sense of the perspectives held by the community in general insofar as this project is concerned.

I believe this project does not represent the best possible option for our community or for efficient border operations through this corridor.

In 2013, I submitted a letter to Transport Canada outlining my concerns with the "Ambassador Bridge Enhancement Project" (attached). My concerns remain, and after a thorough review and consultation with a range of impacted stakeholders, I am even more concerned about the negative impacts this proposed project will have on the community.

Primarily I oppose this proposal due to the attempt to construct a border crossing focused on accommodating international freight in a densely populated area. One of the motivations to initiate the Detroit River International Project (DRIC) process was to address this problem, and therefore, allowing this proposal to go forward runs counter to policy objectives that have been underway for over a decade now. It is therefore difficult to assess the necessity for the ABEP independently from the imminent construction of the DRIC.



brian.masse@parl.gc.ca
<http://www.brianmasse.ca>

The DRIC was proposed and will be built with the express intent of removing international freight traffic from city streets in a densely populated urban environment. This will be impossible for the Ambassador Bridge to achieve in the current location. Currently in order to reach the Ambassador Bridge international truck traffic must vet several traffic lights, a busy commercial district and pass by several schools and neighbourhoods in order to cross the Canada-US border through this region. A massive expansion of capacity both to the Ambassador Bridge Canadian plaza, and the crossing itself, runs counter to the express goals that the DRIC was supposed to achieve.

This government has made a massive infrastructure investment to allow international traffic (particularly freight) to seamlessly access the 401 Highway on the Canadian side to the Interstate system in the United States. Allowing this proposed expansion to go forward given its negative community impacts is unnecessary since the DRIC is a better solution to the precise problem the ABEP seeks to resolve.

Over the years the DIBC themselves have consistently opposed the construction of the DRIC based on their projections that traffic volumes will be insufficient to justify expanded border capacity through this region. Now that it's clear that DRIC will proceed the same logic applies to the ABEP. In their own Statement of Claim against the Canadian Government in a recently adjudicated NAFTA tribunal the Detroit International Bridge Company (DIBC) stated:

Given the level of traffic reasonably projected for the Detroit-Windsor crossing, there is not enough traffic at the crossing to support both the NITC/DRIC and the Ambassador Bridge's New Span. (Section 1.9)

It is my understanding that the DIBC lost this challenge, but as a border operator their assessment of border capacity requirements through this corridor are certainly significant. I would urge the government to accept their analysis that expanded border capacity for international truck freight through this corridor is unnecessary given the imminent construction of the DRIC.

Moreover, it is worth noting that the timelines presented by the DIBC, even in the best case scenario (for the DIBC), see the ABEP construction completed very close to, or after the completion of the DRIC project. DRIC traffic studies concluded that the Ambassador Bridge would see a 20% reduction in traffic share volume once the DRIC is operational. The need for expanded Ambassador Bridge capacity is highly debateable given the government's traffic projections.

This raises the question of the need to increase capacity on the Ambassador Bridge when weighed against the impact that this project will have on the neighbourhood surrounding the Ambassador Bridge. This project proposes to eliminate a significant portion of the housing stock in a heritage designated area of the City of Windsor that has already been decimated by the DIBC.

I've consulted widely with individuals in the impacted heritage area known as Sandwich Towne. Many residents, businesses and elected officials at various levels of government agree that DIBC property acquisitions in the neighbourhood have dramatically and negatively impacted the community. They have further led to the loss of institutions, businesses, jobs and schools by dramatically reducing population density in the area.

Worse, it appears as though the ABEP proposes to potentially encroach onto even more residential housing south of College Ave that is currently well occupied and functional. In short, this is part of a neighbourhood the DIBC has not (yet) destroyed.

Furthermore, the City of Windsor has already expressed its opposition to the DIBC's twinning aspirations and is actively engaged in a zoning dispute with them connected to this issue. Allowing the ABEP to proceed may usurp the City of Windsor's planning authority by prioritizing the objectives of a private sector proponent over the will of the community as expressed through its duly elected civic leadership.

The threshold to usurp the authority of a democratically elected body in favour of a private proposal clearly must be high. Given the DIBC's recognition that traffic volumes will be insufficient to warrant expanded capacity on their crossing, I fail to see the need to allow the project to proceed particularly when they are contrary to the City's Planning priorities.

It is also worth noting that this project as proposed is not an "Enhancement" project at all. In my previous submission to Transport Canada I made the point that *enhancing* the existing span was not given due consideration. This project proposes an entirely new crossing that would (admittedly) be constructed in close proximity to the existing span but is in fact an entirely new span.


Similarly, as previously mentioned, this project proposes to re-route international traffic through what is now still a functional neighbourhood in close proximity to schools and other neighbourhood amenities. However, the drawings submitted raise as many questions as they purport to answer with respect to overall scope and footprint of this project. The submissions at worse in some instances are misleading or at the very least vague.

To conclude, it is my hope that federal authorities will reject this proposal as unnecessary. The DIBC themselves agree that traffic volumes will be insufficient to justify the need for both the DRIC and the ABEP and the City of Windsor has clearly articulated its opposition to this proposal.

It is impossible to fully gauge the impacts of this project based on the information that has been made available to the public. Despite the gaps in their submission however, it is evident that this proposal should be rejected as unnecessary and overly intrusive to the surrounding neighbourhood.

I am grateful for the opportunity to comment on this proposal and wish you well with respect to your deliberations on this matter.

Sincerely,



Brian Masse M.P.
Windsor West

Encl. Letter dated May 31, 2013 from Brian Masse M.P. to Transport Canada on Ambassador Bridge Enhancement Project Environmental Assessment application.

Brian Masse

Member of Parliament
(Windsor West)



HOUSE OF COMMONS
CHAMBRE DES COMMUNES
CANADA

Ottawa

Room 1000 La Promenade Building
Ottawa, Ontario, K1A 0A6
Tel. : 613-996-1541
Fax: 613-992-5397

May 31, 2013

Senior Advisor Environmental Assessment
Transport Canada
Place de Ville, Tower C
330 Sparks Street
Ottawa, ON
K1A 0N5

Windsor

1398 Ouellette, Suite 2
Windsor, Ontario, N8X 1J8
Tel. : 519-255-1631
Fax : 519-255-7913

**Re: Draft Environmental Assessment Screening Report:
Ambassador Bridge Enhancement Project
Reference #: 21100**

Dear Ms. O'Keefe,

I am writing you today to express my concerns about the Ambassador Bridge Enhancement Project as it is outlined in the Draft Environmental Assessment Screening Report. I have represented the area that falls under the scope of this proposal for over 15 years at both the federal and municipal level of government.

In developing my position on this proposed project I want the Department to note that I have conducted my own consultations with other levels of government, environmental groups, transportation experts as well as community groups and individuals who will be impacted by this project.

The fundamental issue consistently raised by stakeholders was to question the purpose, and need of the project and whether or not appropriate alternatives had been seriously considered.

Generally speaking I can apprise you that the overwhelming response has been to oppose this proposal. In addition to questioning whether the project was necessary at all, other concerns of a more technical nature were raised as well as the impact on the surrounding neighbourhood.

The first question that the EA process asks proponents to address is the need for the project and specifically whether or not the proposal is the best alternative to address whatever identified need. Within that context I am not convinced that the proponents in this instance gave due consideration to possible alternatives to the project.



brian.masse@parl.gc.ca
www.brianmasse.ca

The most plausible alternative of upgrading the existing span (referred to hereafter as the upgrading option) to accommodate the purpose of the project was given virtually no consideration whatsoever. This is the most obvious alternative and should have been explored in greater detail to allow the community the opportunity to viably assess a real alternative to this proposal.

It is particularly relevant to consider the upgrading option when you consider the impact that the proponent's proposal will have on the existing neighbourhood. Residents and business owners in the area continue to express deep reservations about the proposed re-routing of traffic, the loss of existing housing stock and the requirement to build new intrusive infrastructure that would further bisect the community.

Again this raises the question of as to the adequate exploration of the upgrade option as potentially the least intrusive alternative to the surrounding neighbourhood.

I am also concerned that a proper storm water management system is not fully described in the proposal. The proponent cites they will comply with provincial and federal standards but neglects to explain in detail how this will be accomplished.

Similarly, the proponents are unclear as to how some of the environmental impacts will be mitigated. Mitigation measures for noise for example will only be developed after a "Community Consultation Plan" is "developed prior to construction" but obviously after this process (public consultation) is completed. This is both vague and temporally incorrect.

It is unreasonable to expect the public to comment if they are not provided with sufficient data upon which they are able to assess the merits and impacts of the project.

Therefore after consulting with my community and as the federal representative for the area where this project is proposed to occur I cannot at this time lend my support to it moving forward. I am unconvinced that the full scope of alternatives was seriously vetted and I am concerned about the impacts of the project to the people and the businesses in the surrounding area. Also the proposal is too vague in some instances.

Thank you for the opportunity to offer comments on this proposal.

Sincerely,

A handwritten signature in cursive script that reads "Brian Masse".

Brian Masse M.P.
Windsor West