



— OBCM —
Ontario's Big City Mayors

The Honourable Paul Calandra

Minister of Municipal Affairs and Housing

minister.mah@ontario.ca

Dear Minister Calandra,

On behalf of Ontario's Big City Mayors (OBCM) I want to thank your government for the creation of the Building Faster Fund (BFF) to help Ontario municipalities meet our housing targets. These funds are essential for our 29 member municipalities to be able to provide the servicing and infrastructure needed to meet our housing goals by 2031.

OBCM is pleased to see the commitment of \$1.2 billion dollars over the next three years in the Building Faster Fund, but we have concerns about the eligibility criteria in place to access these funds.

The Ministry has indicated that it will not count a housing start until a developer pulls the permit. While municipalities can fast track approvals, they do not build homes. Due to issues beyond our control (high interest rates, mounting material costs, labour shortages, etc.), developers have stalled the pulling of many of these permits. This directly impacts our member municipalities' ability to reach the annual housing target required to access this much needed funding.

These issues were also the focus of the recent housing report *Working Together to Build 1.5 Million Homes* (attached to this letter), released by Dr. Mike Moffatt's the PLACE Centre in collaboration with OBCM. In this report, we ask the Province of Ontario to bring all members of the home building process together (e.g., all three levels of government, developers, builders, labour, the higher education sector, the financial services industry, and not-for-profit groups) to create a mutually agreeable plan to reach our shared goal of building 1.5 million homes. It is critical that this plan includes an accountability framework for identifying the barriers to building, and a schedule of annual meetings to allow for us to work together to find solutions for housing delays.

We have heard from our membership on this and understand that you have as well, including most recently a letter from Mayor Shaun Collier from the Town of Ajax.

We all share the same goal; to build more homes for our residents. We hope that you and the Premier, the Honourable Doug Ford, will consider this issue and include the municipal sector in discussions on changes to the eligibility criteria for the Building Faster Fund, and consider our perspective as you look at how to best support municipalities and our joint effort to move the housing portfolio forward.



— **OBCM** —
Ontario's Big City Mayors

Thank you again for your collaborative approach to getting homes built and for your recognition that local leaders are best positioned to make growth decisions for their communities.

Sincerely,

Marianne Meed Ward, Mayor of Burlington

Chair, Ontario's Big City Mayors

cc. Hon. Doug Ford, Premier of Ontario

Hon. Rob Flack, Associate Minister of Housing



CORPORATE TECHNOLOGY
STRATEGIC PLAN (CTSP)
Corporation of the City of Windsor



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Welcome to the Corporate Technology Strategic Plan

We live in a digital age, 95% Canadian use internet and 84% own smartphones. Everyday activities like banking, connecting with friends and families, shopping, and even renewing a driver's license or health card is all online. Digitization of services is not a choice, but a must have.

Our Corporate Technology Strategic Plan (CTSP) is the roadmap for the future designed to meet our residents' expectations. This journey entails improving IT services, enhancing user experiences by offering simple, user-friendly, secure, end-to-end digital services for customers and city service users, and equipping staff and management with the necessary tools to work efficiently and effectively. This includes fully digitized processes, reducing manual tasks, facilitating easy collaboration, enabling hybrid/flexible/remote and field working, and improving data access supported by analytics and insights.

The Vision

“Modern, customer centric City services powered by digital, data and technology”

When services are powered by digital, data, and technology, it creates a whole new experience for the residents by making city services available at their finger tips.

Let's consider a fully digital service scenario:



Mary witnesses a stop sign being knocked over. Using her smartphone, she takes a photo and uploads it to report the problem.

The notification is received and automatically recorded, categorized, located, and a request dispatched to a crew in the area who receives it on a laptop in their work vehicle.

They immediately erect a temporary stop sign. Mary gets an update to let her know that a temporary fix is in place. Mary feels reassured the City is working hard and smart to keep citizens safe.

When a permanent sign is in place Mary receives a notification that the issue has been resolved and is asked to rate her interaction with the City.

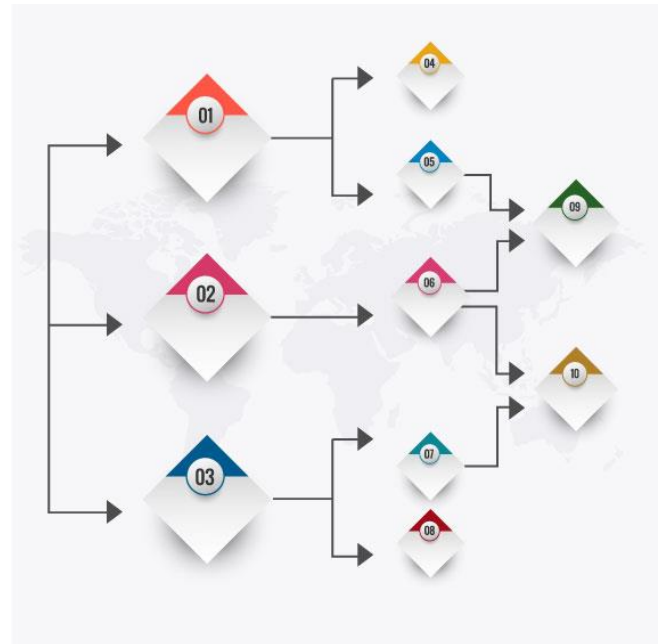


Why Digitization

In the best-run organizations, a combination of people, processes, and technology is crucial for delivering excellent customer services.

Digitizing processes eliminates the need for offline steps and enables transactions to be carried out digitally using computers or smartphones, anytime and anywhere. Integration of business solutions enables seamless task flow between teams and systems, with complete visibility and auditability. The digital process chain empowers management and staff to monitor workflows, identify exceptions, and improve process effectiveness.

This is where we need to be, and by digitizing key processes, we can streamline operations, allocate resources more effectively, and ultimately become a high-performing organization.



What will we need to be powered by digital, data and technology?

To digitize City processes and to deliver modern, customer centric City services we need to develop stronger capabilities in the following areas:

- Designing and delivering Web and Digital services and solutions.
- Implementing and operating effective Business Solutions for our enterprise and specialized business processes.
- Providing modern devices and tools for a modern workforce.
- Designing, building and operating Modern, responsive and flexible Infrastructure.
- Collecting, compiling, analyzing and interpreting data and spatial data.



What are the expected benefits?

Investing in modernization and digital transformation work will bring various benefits:

1

Delivering modern customer service: It will enable the provision of online, self-service options available 24x7 from anywhere, improving convenience for customers and demonstrating commitment to meeting their needs.

2

Shifting transactions to lower cost channels: By encouraging online transactions, the organization can reduce reliance on expensive channels and provide better value for taxpayers' money.

3

Increasing efficiency and productivity: Modernization efforts can streamline back-office operations and enhance productivity for field workers, leading to improved overall efficiency.

4

Simplifying work processes: Simplifying processes reduces staff frustration, enhances recruitment and retention efforts, and creates a more favorable work environment.

5

Reducing duplicative and unnecessary work: Automation and modernization can identify and eliminate duplicative or unnecessary tasks, freeing up staff capacity for more valuable, high-impact work across the organization.

6

Enabling data analysis and insights: Digital transformation facilitates data collection, analysis, and mining. This allows organizations to identify trends and gain insights that inform future operational improvements and decision-making.



Three-Stage Approach

There is a lot of work to do, so we will take a three-stage approach:

■ Stage 1 – Setting the Foundations (2023 – 2025)

The first stage is about setting the foundations, the conditions to be successful. This includes:

- Repositioning Information Technology (IT), establishing a new IT organization structure and hiring to key roles to fill current capability gaps.
- Setting up a revamped Technology, Digital and Data Governance Model including new committees, Working Groups and communities of practice, as well as reviewing IT policies and setting technology architectures.
- Review IT Financing, with a view to increasing investment in technology.
- Fully adopting Microsoft 365, including Teams, OneDrive, SharePoint Online.
- Developing the Enterprise Resource Planning (ERP) business case, strategy and roadmap.
- Improving IT service basics through a focus on IT Service Catalogue, optimizing core IT processes, and introducing online self-service capabilities for IT services.
- Establishing a Digital, Data and Technology Education and Training program.
- Continue to strengthen security and risk management programs.





■ Stage 2 – Pillars for Success (2024 – 2028)

With the foundations established, we look to deliver a series of critical technology products, programs, and projects, including:

- Establishing a Corporate Web and Digital program – updating the City’s website and implementing digital service building blocks.

- Establishing effective enterprise (pillar) systems programs for ERP, Asset and Work, Planning, Permits and Licensing, Customer Relationship Management, Collaboration and Information Management and Document and Records Management.

- Setting the corporate Data Strategy and setting up a corporate Business Intelligence and data platform.

- Continued build-out of the IT organization through the addition of new resources, and review of all “tech-adjacent” roles and align to proposed Business Technologist role.

- Progressively update all job descriptions corporate-wide to refresh technology and digital skill requirements.

- Modernizing technology offerings, including: modernization of the device fleet, expanding access to technology resources for all employees, setting Cloud, Print and Telephony Strategies.

- Technology, Digital and Data Literacy program, including training and learning, external speakers and showcasing internal successes.





■ Stage 3 – Accelerate (2027+)

With the pillars established, the City can accelerate its innovative practices through:

- Continued evolution of its corporate platforms to streamline services, processes and improve experiences for customers and staff.
- Expanded breadth of digital services, built on the ability to design, launch, and iterate new digital products, services and capabilities that sit on common digital patterns, (login, request, register, apply, pay, book/reserve).
- Expanded GIS, data, and analytics capabilities, including authoritative corporate data sources, geo and other analysis-driving insights and decision-making.
- A digital mindset and culture throughout the organization, where there is an openness to digitally-driven change.



Delivering Major Programs of Work

The focus of our work is targeted across five major programs, each designed to put in place the key solutions and services that we need to meet the needs of the community and our staff. These are the key areas of focus and initiatives that you can expect to see over the coming years:



Digital Services

This program focuses on building the web and digital platforms and capabilities to enable us to design and deliver great digital city services and experiences.

Key initiatives include:



- New Web and Digital team
- Corporate Digital Standards
- Revamp Windsor.ca
- Digital Platform with reusable patterns
- New Digital Services

Modern Workplace

This program focuses upon giving staff the tools, they need to do the job and enabling a modern/digital workplace that can attract and retain the brightest minds.

Key initiatives include:



- Microsoft 365 as the core collaboration platform
- Information Strategy
- Effortless Agenda and meeting management system.
- Renew End-Point Technology (Laptops, Smartphones)
- IT Support Service Expansion
- Advanced Workflow Management



Modernized Business Solutions

This program focuses upon modernizing the City's core business processes and the solutions that support those core processes.

Key initiatives include:



- ERP Replacement
- Asset Management Systems Roadmap and Enhancements
- Planning, Permitting and Licensing Systems Roadmap and Enhancements
- Customer Relationship Management (CRM) System Roads Map and Enhancements
- Key Business Solutions Replacement
- Integration Platform

Modernized Infrastructure

This program is designed to ensure that the City's IT infrastructure is modern, secure, resilient, agile, and interoperable.

Key initiatives include:



- Enhanced Cybersecurity and Risk Management program
- Comprehensive Business Continuity and Disaster Recovery programs
- Cloud Strategy and Policies
- Network Investment Strategy
- Telephony Strategy



GIS and Data

This program is about ensuring the City is well positioned to fully leverage the power of GIS and data to inform decision-making and increase efficiency and effectiveness.

Key initiatives include:



- Establishing a mature enterprise GIS approach
- Modern enterprise GIS environment
- GIS strategy
- GIS Products and Services Expansion
- GIS Integration with enterprise systems
- NG-911 Implementation
- Regional GIS Partnership Expansion
- Corporate Data and BI Platform

Measuring Success

Moving forward, we need to build momentum by beginning to action the work identified here. The Strategic Plan outlines specific tracking metrics in order to measure success. These fall under the areas of the Strategic Plan itself, the digital services, the digital workplace, the digitized business processes, the digital infrastructure, and GIS/data/analytics.



Conclusion

Information technology is an ever-changing landscape, and leading organizations are quick to embrace and invest in its potential. The Corporate Technology Strategic plan positions the City of Windsor as a municipal leader, a workplace that attracts top talent, realizing its vision of delivering **Modern, Customer-Centric City Services Powered by Digital, Data and Technology.**

CITY OF WINDSOR
SCHEDULE OF MEETINGS - 2024

| JANUARY 2024 | | | | | | |
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| JULY 2024 | | | | | | |
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| AUGUST 2024 | | | | | | |
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| SEPTEMBER 2024 | | | | | | |
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| OCTOBER 2024 | | | | | | |
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| NOVEMBER 2024 | | | | | | |
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| DECEMBER 2024 | | | | | | |
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CR500/2023 December 11, 2023

-  Statutory Declared Holidays - Windsor City Hall Closed
-  School Holidays - March Break
-  Regular City Council Meetings (10:00 a.m. Council Chambers, 1st floor, Windsor City Hall)
-  FCM Conference - June 6-9, 2024, Calgary, Alberta
-  AMO Conference - August 18-21, 2024, Ottawa, Ontario
-  Ford Fireworks - June 24, 2024 (rain date June 25, 2024)

STANDING COMMITTEES

-  Development & Heritage Standing Committee (5 members of Council + 8 citizens) 4:30 p.m.
-  Community Services Standing Committee (5 members of Council) 9:00 a.m.
-  Environment, Transportation & Public Safety Standing Committee (5 members of Council) 4:30 p.m.

**DEADLINES FOR SUBMISSION OF REPORTS
SCHEDULED FOR CONSIDERATION AT
STANDING COMMITTEE MEETINGS**

2024

| DATE OF STANDING COMMITTEE MEETING | NAME OF STANDING COMMITTEE | DATE OF AGENDA REVIEW MEETING (Tuesday 11:00 a.m.) | DEADLINE FOR SIGNED REPORTS TO CAO (Wednesday 4:00 p.m.) | ISSUANCE OF STANDING COMMITTEE AGENDA |
|---|---|---|---|--|
| January 8 | Develop & Heritage | *December 12/23 | *December 13/23 | *December 20/23 |
| January 31 | Enviro Transp & PS | January 16 | January 17 | January 19 |
| February 5 | Develop & Heritage | January 23 | January 24 | January 26 |
| February 7 | Community Services | January 23 | January 24 | January 26 |
| February 28 | Enviro Transp & PS | February 13 | February 14 | February 16 |
| March 4 | Develop & Heritage | February 20 | February 21 | February 23 |
| March 6 | Community Services | February 20 | February 21 | February 23 |
| March 27 | Enviro Transp & PS | March 12 | March 13 | March 15 |
| April 2 | Develop & Heritage | March 19 | March 20 | March 22 |
| April 3 | Community Services | March 19 | March 20 | March 22 |
| April 24 | Enviro Transp & PS | April 9 | April 10 | April 12 |
| May 1 | Community Services | April 16 | April 17 | April 19 |
| May 6 | Develop & Heritage | April 23 | April 24 | April 26 |
| May 29 | Enviro Transp & PS | May 14 | May 15 | May 17 |
| June 3 | Develop & Heritage | May 21* | May 22 | May 24 |
| June 5 | Community Services | May 21* | May 22 | May 24 |
| June 26 | Enviro Transp & PS | June 11 | June 12 | June 14 |
| July 2 | Develop & Heritage | June 18 | June 19 | June 21 |
| July 3 | Community Services | June 18 | June 19 | June 21 |
| July 31 | Enviro Transp & PS | July 16 | July 17 | July 19 |
| August 6 | Develop & Heritage | July 23 | July 24 | July 26 |
| September 3 | Develop & Heritage | August 20 | August 21 | August 23 |
| September 4 | Community Services | August 20 | August 21 | August 23 |
| September 25 | Enviro Transp & PS | September 10 | September 11 | September 13 |
| October 2 | Community Services | September 17 | September 18 | September 20 |
| October 7 | Develop & Heritage | September 24 | September 25 | September 27 |
| October 30 | Enviro Transp & PS | October 15 | October 16 | October 18 |
| November 4 | Develop & Heritage | October 22 | October 23 | October 25 |
| November 6 | Community Services | October 22 | October 23 | October 25 |
| November 27 | Enviro Transp & PS | November 12 | November 13 | November 15 |
| December 2 | Develop & Heritage | November 19 | November 20 | November 22 |
| December 4 | Community Services | November 19 | November 20 | November 22 |

Directions: Staff involved in drafting and/or approving Council reports are encouraged to keep this schedule handy to ensure that reports will appear on the intended Council/Standing Committee meeting dates.

Use *Agenda.net* to create all standing committee reports.

NOTE: Development & Heritage Standing Committee reports from the meeting (first Monday of the month) will be brought to full Council at the last council meeting of the same month.

Key:

*: early/late due to holiday

Community Services = Community Services Standing Committee

Develop & Heritage = Development & Heritage Standing Committee

Enviro Transp & PS = Environment, Transportation & Public Safety Standing Committee

Updated November 2023

**DEADLINES FOR SUBMISSION OF REPORTS
SCHEDULED FOR CONSIDERATION AT
CITY COUNCIL MEETINGS
2024**

| DATE OF COUNCIL MEETING | DEADLINE FOR PROPOSED/ DRAFT REPORTS FOR AGENDA REVIEW (Noon Monday) (See notes below) | AGENDA REVIEW MEETING (Tuesday 11:00 a.m.) | DEADLINE FOR SIGNED REPORTS TO CAO (4:00 p.m. Wednesday) | ISSUANCE OF AGENDA BY COUNCIL SERVICES (9:00 a.m. Friday) |
|--|---|--|---|--|
| January 15 | December 29/23* | January 2* | January 3 | January 5 |
| January 29 | January 15 | January 16 | January 17 | January 19 |
| February 12 | January 29 | January 30 | January 31 | February 2 |
| February 26 | February 12 | February 13 | February 14 | February 16 |
| March 18 | March 4 | March 5 | March 6 | March 8 |
| April 8 | March 25 | March 26 | March 27 | March 28* |
| April 22 | April 8 | April 9 | April 10 | April 12 |
| May 13 | April 29 | April 30 | May 1 | May 3 |
| May 27 | May 13 | May 14 | May 15 | May 17 |
| June 10 | May 27 | May 28 | May 29 | May 31 |
| July 8 | June 24 | June 25 | June 26 | June 28 |
| July 22 | July 8 | July 9 | July 10 | July 12 |
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| October 15 | September 27 * | October 1 | October 2 | October 4 |
| October 28 | October 11* | October 15 | October 16 | October 18 |
| November 12 | October 28 | October 29 | October 30 | November 1 |
| November 25 | November 8* | November 12 | November 13 | November 15 |
| December 9 | November 25 | November 26 | November 27 | November 29 |

Directions: Staff involved in drafting and/or approving Council reports are encouraged to keep this schedule handy to ensure that reports will appear on the Council meeting dates intended.

- * early/late due to the holiday
- x No supplementary items **unless emergency.**
- ✓ Each Council report must be created using *Agenda.net*.

STEPHEN LAFORET
Fire Chief
CEMC

JAMES WAFFLE
Deputy Fire Chief

JONATHAN WILKER
Deputy Fire Chief



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FIRE & RESCUE SERVICES

November 28, 2023

Monica Monsma
MDOT Environmental Services Section
425 West Ottawa St.
P.O. Box 30050
Lansing, MI 48909

Dear Officer Monica Monsma:

Subject: City of Windsor Comments and Concerns re: Proposed Changes To Hazardous Materials Route Restrictions On Ambassador Bridge.

This letter is being submitted on behalf of the City of Windsor to provide the City's comments and concerns regarding the proposed changes to hazardous materials route restrictions on the Ambassador Bridge. We ask that MDOT accept and consider the City's comments as part of the public comments on the proposed changes.

The City of Windsor opposes changes in Hazardous materials route restrictions on the Ambassador Bridge for the following reasons.

Changing the routing provides no tangible safety benefit. U.S. Federal regulation 49 CFR 397.71 states that changes to NRHM routing designation can only occur if there is an overall increase to public safety.

397.71 (4) i,ii,iii

*(4) **Through routing.** In establishing any NRHM routing designation, the State or Indian tribe shall ensure through highway routing for the transportation of NRHM between adjacent areas. The term "through highway routing" as used in this paragraph means that the routing*

designation must ensure continuity of movement so as to not impede or unnecessarily delay the transportation of NRHM. The State or Indian tribe shall utilize the procedures established in paragraphs (b)(2) and (b)(3) of this section in meeting these requirements. In addition, the State or Indian tribe shall make a finding, supported by a risk analysis conducted in accordance with paragraph (b)(1) of this section, that the routing designation enhances public safety. If the risk analysis shows—

(i) That the current routing presents at least 50 percent more risk to the public than the deviation under the proposed routing designation, then the proposed routing designation may go into effect.

(ii) That the current routing presents a greater risk but less than 50 percent more risk to the public than the deviation under the proposed routing restriction, then the proposed routing restriction made by a State or Indian tribe shall only go into effect if it does not force a deviation of more than 25 miles or result in an increase of more than 25 percent of that part of a trip affected by the deviation, whichever is shorter, from the most direct route through a jurisdiction as compared to the intended deviation.

(iii) That the current route has the same or less risk to the public than the deviation resulting from the proposed routing designation, then the routing designation shall not be allowed

The report prepared for MDOT by Factor, dated November 2023, states the analysis results show a small difference in statewide risk if the existing Class 3 and 8 restrictions were lifted; however, “the difference is not significant enough to make a compelling case for or against any changes.”

The City asserts that lifting the current restrictions to allow the transportation of Class 3 and Class 8 substances does not present a neutral risk scenario but substantially increases the risk to commercial trade between Canada and the United States and decreases safety for the residents of the City of Windsor.

Routing Class 3 and Class 8 Hazardous materials across the Ambassador Bridge will result in these goods travelling through residential neighbourhoods in Windsor, creating a risk to thousands of residents in the City of Windsor. This risk does not exist currently. In addition to the increased risk to residents, a change in routing would allow dangerous goods to travel through the University of Windsor Campus.

Additionally, traffic delays occur regularly on the Ambassador Bridge, which inhibits the “continuity of movement so as to not impede or unnecessarily delay the transportation of NRHM,” as defined in the regulation.

Construction

The Ambassador Bridge has been operating for over nine decades; its design does not meet modern standards. The Gordie Howe International Bridge is expected to open for business in 2025 and is a

safer alternative. This new crossing will be built to modern standards and better able to withstand an emergency involving dangerous and hazardous goods.

Due to its location and access to the Rt. Hon Herb Gray Parkway, hazardous materials transported across the Gordie Howe crossing would not encroach on residential areas or educational institutions and therefore not increase the risk to the public.

Emergency Response

Hazardous Materials emergencies create significant risks to the public, infrastructure and first responders. Runoff from spills can contaminate the ground and water supply. Fires involving flammable liquids generate tremendous heat, which can damage structural components and roadways.

Runoff from flammable liquid fires creates three additional hazards: product migration from the incident site, fire spread due to ignited product flowing from the incident site and environmental concerns associated with using firefighting foam containing Polyfluoralkyl (“PFAS”) with impacts to property, groundwater and the Detroit River. An appropriate drainage and containment system must be in place.

The National Fire Protection Association standard for Road Tunnels, Bridges, and other Limited Access highways (NFPA 502) establishes the following general requirements:

4.3 Fire Protection and Life Safety

4.3.1 Regardless of the length of the facility, at a minimum, the following factors shall be considered as part of a holistic multidisciplinary engineering analysis of the fire protection and life safety requirements for the facilities covered by this standard:*

- (1) New facility or alteration of a facility*
- (2) Transportation modes using the facility*
- (3) Anticipated traffic mix and volume*
- (4) Restricted vehicle access and egress*
- (5) Fire emergencies ranging from minor incidents to major catastrophes*
- (6) Potential fire emergencies including but not limited to the following:*
 - (a) At one or more locations inside or on the facility*
 - (b) In close proximity to the facility*
 - (c) At facilities a long distance from emergency response facilities*
- (7) Exposure of emergency systems and structures to elevated temperatures*
- (8) Traffic congestion and control requirements during emergencies*
- (9) Fire protection features, including but not limited to the following:*
 - (a) Fire alarm and detection systems*
 - (b) Standpipe systems*
 - (c) Water-based fire-fighting systems*
 - (d) Ventilation systems*
 - (e) Emergency communications systems*

- (10) Facility components, including emergency systems
- (11) Evacuation and rescue requirements
- (12) Emergency response time
- (13) Emergency vehicle access points
- (14) Emergency communications to appropriate agencies
- (15) Facility location such as urban or rural (risk level and response capacity)
- (16) Physical dimensions, number of traffic lanes, and roadway geometry
- (17) Natural factors, including prevailing wind and pressure conditions
- (18) Anticipated cargo
- (19) Impact to buildings or landmarks near the facility
- (20) Impacts to facility from external conditions and/or incidents
- (21) Traffic operating mode (unidirectional, bidirectional, switchable, or reversible)

The City of Windsor is unaware of any multidisciplinary engineering analysis of the fire protection and life safety requirements of the Ambassador Bridge. It is unlikely that a release of hazardous materials from the Ambassador Bridge to the Detroit River could be effectively contained and would be dispersed to the environment causing degradation of the international water and potential effects to the sediments at the riverbed.

NFPA 502 Chapter 6 provides specific guidance on bridges and elevated roadways.

NFPA 502 Chapter 6 Bridges and Elevated Highways

6.3 Protection of Structural Elements.

6.3.1 Acceptable means shall be included within the design of the bridge or elevated highway to prevent progressive structural collapse or collapse of primary structural elements.*

6.3.1.1 Primary structural elements shall be protected in accordance with this standard in order to achieve the following functional requirements:

- (1) Support fire fighter accessibility*
- (2) Minimize economic impact*
- (3) Mitigate structural damage*

6.3.2 Where it has been determined by engineering analysis that collapse of the bridge or elevated highway will impact life safety or have unacceptable implications, the bridge or elevated highway, including its primary structural elements, shall be protected from collision and capable of withstanding the time-temperature exposure represented by the selected design fire scenario.*

6.3.2.1 The design fire scenario shall be used to design a bridge or elevated highway.

6.3.2.2 The selection of the design fire scenario shall consider the types of vehicles passing under and on the bridge or elevated highway.

6.3.3 For through truss bridges, suspension (including cable stay) bridges, or elevated highways, an engineering analysis shall be

prepared to determine acceptable risk due to fire, including possible collapse scenarios.

The City of Windsor is unaware of any analysis to determine the ability of the bridge to withstand a high-temperature fire commensurate with the types of vehicles that would traverse the bridge under the proposed changes.

NFPA 502 6.8 Drainage

6.8.1 On bridges and elevated highways, drainage systems to channel and collect surface runoff, which can include spilled hazardous or flammable liquids, shall be designed to drain to areas that do not introduce additional fire hazards on or outside the facility.

At a minimum, the NFPA standard identifies the need to control runoff. The City of Windsor is unaware of an appropriate drainage system capable of mitigating the hazards associated with unchecked runoff in the event of a spill on the Ambassador Bridge. Without an appropriate drainage and containment system, there is potential for spilled hazardous materials or flammable liquids to flow directly into the Detroit River, down the bridge deck to the CBSA screening area, and/or onto the City streets and into the municipal stormwater sewer system.

NFPA 502 Chapter 14 Regulated and Unregulated Cargoes

14.1 General.

14.1.1 The authority having jurisdiction (AHJ) shall adopt rules and regulations that apply to the transportation of regulated and unregulated cargoes.*

14.1.2 Design and planning of the facility shall address the potential risk presented by regulated and unregulated cargoes as permitted by 14.1.1.

14.1.3 Development of such regulations as permitted by 14.1.1 shall address the following:*

- (1) Population density*
- (2) Type of highway*
- (3) Types and quantities of hazardous materials*
- (4) Emergency response capabilities*
- (5) Results of consultation with affected persons*
- (6) Exposure and other risk factors*
- (7) Terrain considerations*
- (8) Continuity of routes*
- (9) Alternative routes*
- (10) Effects on commerce*
- (11) Delays in transportation*
- (12) Climatic conditions*
- (13) Congestion and accident history*

The City is unaware of any design or planning elements that have been undertaken to address the topics detailed in NFPA 502 Chapter 14. While addressing all of these elements is important, the effect on commerce is particularly concerning. The Ambassador Bridge is the busiest commercial border crossing in North America with hundreds of millions of dollars of goods crossing each day. Without the necessary safeguards and protective systems in place, a hazardous materials spill or flammable

liquid fire can potentially disrupt travel for an extended period if not indefinitely. A prolonged disruption of service on the bridge will affect international commerce and will have a direct effect on the international supply chain.

International Relations

The Ambassador Bridge is a key part of the supply chain and routing for international truck movement and commerce. Any change in hazardous materials routing could have severe impacts on both sides of the border. Transport Canada is the entity charged with responsibility for the transportation of dangerous goods in Canada. Within Transport Canada, the Transportation of Dangerous Goods Directorate manages the promotion of public safety related to transportation of dangerous goods. The TDG Directorate should play a key role in the development of any proposed changes to hazardous materials routing where the hazardous materials will travel into or out of Canada. The City is unaware of any efforts to involve Transport Canada or the TDG Directorate in the discussions underway at MDOT, and the reports included in the consultation materials do not make reference to any international consultation. Agreement with Canada is necessary before any change can be made without a potentially embarrassing outcome.

Summary

Under all circumstances, the City of Windsor opposes changes to hazardous material routing on the Ambassador Bridge. The bridge is ninety-four years old and does not meet modern-day design requirements aimed at mitigating the risks associated with transporting dangerous goods or withstanding the effects of an incident.

There is no need to action the proposed changes to hazardous material routing the Gordie Howe International Bridge will soon operate and provide a modern, safer alternative to changing the current route restrictions on the Ambassador Bridge. Given that this new modern facility will be available shortly, the increased risk resulting from the change in restrictions, cannot be justified. Furthermore, the road system to and from the GHIB diverts hazardous materials away from densely populated residential areas and the University of Windsor, whereas allowing these materials across the Ambassador Bridge exposes our residents and student population to an increased unnecessary and avoidable risk.

Respectfully,

Stephen Laforet, MPA, CMM III Fire Service Executive
Fire Chief/CEMC