



## Eastern Border Transportation Coalition

EBTC Members are the Transportation Agencies of the U.S. States of Michigan, New York, Vermont and Maine and the Canadian Provinces of Ontario, Quebec, New Brunswick, Nova Scotia, and Newfoundland & Labrador

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Department of Homeland Security  
Washington, D.C.

RE: **Western Hemisphere Travel Initiative (DHS 2005-0023)**

The Eastern Border Transportation Coalition (EBTC) is comprised of state and provincial agencies of transportation along the eastern Canada/U.S. border. The coalition is dedicated to the development of efficient north/south transportation corridors, including safe and secure border crossings, which are vital to the national, state and provincial economies.

Cross-border traffic between the States and Provinces in the EBTC's region accounts for almost 80% of the trips (commercial and passenger vehicles) between the United States and Canada. Approximately 85% of the total trade, by value, between the two nations also travels through our Ports of Entry. The economic significance of efficient border flow make EBTC extremely concerned about the proposed Western Hemisphere Travel Initiative. We believe it will not only be disruptive to efficient flows at the Canada/U.S. border, but also disruptive to border communities and individuals living near the border, as well as individuals and communities throughout both countries.

Following the September 11, 2001 tragedies, there was a general consensus that, despite our increased effort to combat terrorism, we must continue to pursue our normal daily activities and way of life to demonstrate that we will not let terrorism change our valued lifestyles. EBTC believes that the Western Hemisphere Travel Initiative will, in fact, change many people's way of life and daily activities in a negative way.

The EBTC submits that this proposed new initiative is counter productive to efficient cross-border travel and will have significant economic implications as highlighted below:

#### Efficiency of travel

- Expansion of manual checking of documents like passports, or other approved travel documents, will constrain cross border travel by adding to already labor intensive tasks in the clearance process, delaying the flow of people and goods and, therefore, having a negative impact on the economies of both the United States and Canada.
- The initiative does not recognize that there are a number of border "communities" which, while comprised of independent towns and cities on each side of the border, act as one community where there is a constant movement across the border in both directions for personal, family, commercial, and leisure activities. Implementation of the proposal would have a profound negative impact on these communities, including local businesses and their suppliers, disrupting or delaying provision of emergency services, damaging local and regional economies, in addition to disrupting the daily lives of the residents.

- In some communities (eg. Campobello Island, New Brunswick and Point Roberts, Washington) the only way for residents to travel to other parts of their own country is by transiting through the neighboring country. As a result, this proposal would restrict the legitimate intra-country travel of these people

### Deterrent to travel

- The cost of a passport, and its subsequent renewals, is significant for many individuals and even more so for families with children. This cost would be a deterrent to cross border travel, with derogatory impacts on local economies.
- Many cross border trips are casual, spur-of-the-moment, and for leisure purposes and these crossings are likely to be greatly reduced under the proposal
- Field trips for school children often cross the border for school events and sporting activities, and these will be impeded or significantly curtailed by the proposal
- There would likely be a significant reduction in cross border tourism and international convention attendance both of which are major revenue generators, including tax receipts, for communities, states and provinces.
- Many more passports would be issued and carried regularly and casually in cars and pockets thereby creating a far greater security issue through the potential for increased theft or loss, and subsequent misuse of these documents. The cost of replacing lost or stolen passports would also be significant in terms of both dollars and

additional personnel needs for investigations related to lost or stolen documents and processing of their replacements.

In addition to the above, it is important to note that the proposal moves further away from the long-standing ideal of a perimeter security concept, by increasing the impediments to a coordinated and complementary Canada/U.S. cross-border clearance process that would enhance North American security.

In light of this, the EBTC recommends an economic and quality of life impact assessment be conducted, including public meetings to be held in border communities, to determine the full extent of the potential impacts and acquire the local perspectives of the proposal. We further recommend that any solution should consider the use of technology-based identification methods to facilitate low risk cross border movements.

The Eastern Border Transportation Coalition trusts that you will find our comments useful and give them full consideration before progressing towards implementation of the proposed travel initiative.

We thank you for the opportunity to comment.

Respectfully submitted,

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