

August 27, 2021

Katerina Downard  
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Sent Via Email: [Katerina.Downard@Ontario.Ca](mailto:Katerina.Downard@Ontario.Ca)  
and submitted online via Environmental Registry of Ontario (ERO)

Dear Katerina Downard,

**Re: ER-019-3839 Discussion Paper Greater Golden Horseshoe Transportation Plan**

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

We are pleased to provide comments from an agricultural and rural Ontario perspective on the Greater Golden Horseshoe Transportation Plan (GGHT Plan) Discussion Paper to inform the development of a long-term transportation plan for the Greater Golden Horseshoe.

**More Than Highway Solutions**

The Discussion Paper noted that between 2001 and 2016, travel demand on GGH highways grew three times faster than the rate of new road construction. Population in the GGH will increase by fifty per cent to about fifteen million people over the next thirty years. New highway construction can never keep up with the demand, and alternative solutions must be prioritized over expanding highways. This includes enabling more remote work opportunities, drastically improving mass commuter infrastructure, and enabling more and denser development within other urban areas outside of the Greenbelt, including Guelph, Kitchener-Waterloo, Barrie, Peterborough, New Market, Brantford and Niagara.

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These alternatives to new construction require a common vision for the region. This includes improved east-west transit lines between Oshawa and Hamilton, where the vast bulk of congestion exists, and limiting highway solutions between the GTA and rural/urban centres.

OFA supports the GGHT Plan vision to change the regional transit system from a radial commuter network with most connections centered on Union Station, to an expansive grid, to transport people and goods to where they are needed without going through the GTA core. This concept should be expanded to the larger region to ensure regional routes are available to reduce traffic flow reliance on central 400 series highways without adding undue stress to existing agricultural systems.

### Alignment with Other Initiatives

The GGHT Plan aligns with other provincial initiatives, including the Provincial Policy Statement, and plans for the Greenbelt, Oak Ridges Moraine Conservation and Niagara Escarpment. We support a holistic approach to land, ecology, conservation and biodiversity preservation while supporting a robust agricultural system throughout Ontario.

A Place To Grow: Growth Plan for the Greater Golden Horseshoe (APTG) recognizes the importance of the agricultural land base, it's economic contributions to Ontario's GDP, and it's positive environmental and food security benefits. The APTG sends a strong message that the agricultural system approach is to be used to **maintain and enhance the geographic continuity of the agricultural land base and the functional and economic connections to the agri-food network:**

*The [GGH] region also has some of Canada's most important and productive farmland. Its fertile soil, moderate climate, abundant water resources, and proximity to markets support agricultural production that cannot be duplicated elsewhere in the country.*

*The magnitude of growth expected over the coming decades for the GGH presents several challenges [including] the finite supply of quality agricultural lands that feed the region and beyond [and] must be protected to ensure a vibrant rural and productive agricultural economy and a secure food supply for future generations.*

*The policies of this [APTG] Plan regarding how land is developed, resources are managed and protected, and public dollars are invested are based [among several principles] on the following: Support and enhance the long-term viability and productivity of agriculture by protecting prime agricultural areas and the agri-food network.*

### Consideration for Agricultural Systems

The APTG provides for the identification and protection of agricultural systems in the GGH, which includes continuous and productive land bases, comprised of prime agricultural areas, specialty crop areas, rural lands, and a complementary agri-food network that together enable the agri-food sector to thrive. Agricultural systems contain important natural heritage and hydrologic features, and farmers play a vital role in their stewardship. Providing for agricultural systems will support the viability of the agricultural sector as the GGH region grows.

OFA is concerned that no consideration of agricultural systems is included in the GGHT Plan Discussion Paper. We feel that the application of an agricultural systems approach to the questions posed in the Discussion Paper would be an excellent opportunity for the province to

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fulfil some APTG policies to protect the valuable agricultural land base and thriving agri-food sector within the GGH.

### Local Transit Solutions

From a rural perspective, alternative transit options are scarce. OFA supports enabling community transportation and intercommunity busing in rural areas that are unserved or underserved by mass transit. As echoed in the Discussion Paper survey results, “make it easier to work and get what I need close to home.” The Discussion Paper recognizes that “We need to provide more choices on how and when people and goods travel and offer creative solutions to make the most of our infrastructure.” To achieve an integrated transportation system, OFA supports ensuring transportation connections are incorporated along and beneath highway systems through appropriately sizing bridges and culverts, and developing connections to commuter parking and transit hub areas.

### Better Design to Manage Transportation System Users

When viewed from the agricultural lens, we note that agricultural systems rely on adequate road infrastructure to support agricultural vehicles, good shoulders, clear sightlines, and correct turning ratios in roundabouts and other intersections whereby combines and agricultural equipment can operate safely and efficiently. These pieces of equipment travel below 40 km/h which is greatly reduced compared to passenger or commercial vehicles. We therefore urge the province to consider strategies to divert non-agricultural vehicular traffic to areas which would be outside of those agricultural systems identified in provincial mapping wherever possible.

OFA agrees with the Discussion Paper vision “of an interconnected transportation system that provides a safe, seamless and accessible transportation experience for all” with the proviso that agricultural systems be considered. Solutions including new infrastructure and new policies are needed to improve the transportation experience for all users. For that to occur, compatibility with agriculture must be included. In terms of taking a wholistic, regional approach to the GGH Transportation System that will manage challenges over the long term, we recommend that routing non-farm traffic through agricultural areas is not compatible with an agricultural system approach and should be proactively avoided through policy design.

Safe operation of farm equipment on GGH roads must be of paramount importance to the province, and long lines of non-agricultural traffic traveling at reduced speeds behind farm equipment is not in anyone’s best interest.

The Provincial Policy Statement includes a framework for environmental protections. Because Ontario is exempt from review under the PPS, we recommend the MTO commit to voluntary project review and incorporate Agricultural Impact Assessments (AIA) at the design stage of MTO projects.

New transportation infrastructure projects need to take this crucial sector of the Ontario economy into consideration at the design phase. New rail corridors, new highways, and new interchanges, all need to be evaluated using the AIA framework. AIA analysis will ensure the design of any new or upgraded infrastructure avoids or mitigates any adverse drainage impact on surrounding lands. Further, the timely and efficient operation of agricultural systems can not afford to be compromised by new projects that do not provide safe bridges, underpasses, crossings and through-routes for farm equipment. Otherwise, this large and slow-moving equipment is on the roads for longer hours and greater distances, impairing the flow of persons, goods and services.

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## Environmental Considerations

Farmers strive to best manage inputs and costs, and work diligently to reduce harmful emissions. Additional time and distance to travel around interchanges or infrastructure that has not taken agriculture into account requires more fuel and emits more harmful emissions.

This added time also impacts perishable crop and other farm product freshness, in that many farm products are transported daily based on the Just-In-Time inventory management strategy. Maintaining and enhancing the ability of agricultural growers to bring their product to market in the safest and timeliest fashion possible improves product quality locally and at the international level as many of our processors feed the global food supply.

Transportation is a high-level contributor to the effects of climate change. OFA supports the adoption of low- and zero-carbon transit, including the adoption of electric and hydrogen-powered cars, trucks and transit vehicles, and a regional strategy for low- and zero-carbon charging and fuelling stations.

Improved engineering standards are needed to protect land and infrastructure from natural hazards and to preserve the longevity of these features. We recommend transportation design and planning prioritize the preservation of natural heritage and biodiversity, including natural areas, wildlife and wildlife passage. Transportation corridors have direct impacts on these habitats, and act as barriers to safe passage between habitats. These corridors also impact landscape connectivity and impact the safe passage of large and slow-moving farm machinery between farm fields that are compromised when engineering designs fail to consider these vehicles.

OFA supports environmental compensation to preserve natural areas, improve air quality and manage risks to climate change. Components of agricultural and natural systems such as wetlands and woodlands improve climate resiliency, mitigate storm and flood waters, and improve biodiversity. OFA supports strategic stormwater management for existing roadways and highway widenings and expansions.

## Logistics

OFA believes it is critical to Ontario's commercial sectors that the GGHT Plan improve the efficiency of transporting goods across the region. We support MTO efforts to streamline inspection and administrative burdens on commercial vehicle operators to reduce red tape and increase business efficiencies. The Discussion Paper envisions "a resilient road network that provides more efficient freight routes and better route alternatives. Policies will encourage road users to shift their travel so the system works better for everyone."

We encourage the Ministry to consider the movement of agricultural goods and services as a priority for the GGHT Plan Logistics Network. Agriculture is unique in that inputs, labour, production and equipment move between thousands of farms in the GGHT and to and from food processing facilities, groceries, warehouses, local markets and international destinations through a combination of trucking, rail freight, and shipping. We recommend that agricultural representation be included in the development phase of the GGHT system planning process moving forward.

Applying an agricultural lens to this concept means that road networks which service agricultural systems should be prioritized for agricultural traffic. We recommend policy designed to encourage other road users to shift their travel to other corridors so that the system works better for everyone.

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Adopting a policy of encouraging non-agricultural road users to choose alternate routes should improve safety for all users. This would lower the frequency of long lines of non-agricultural vehicular traffic building up behind slower moving farm equipment, reducing the temptation for these other users to pass farm equipment unsafely which is a recurring contributing factor in accidents.

In support of this initiative, a digital marketing and road signage campaign could be developed which would identify certain regions as being important active farm communities and warn users that planning routes to avoid these roads could result in time and emission reductions for everyone.

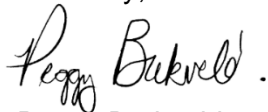
### Agri-Tourism

Related to supporting tourism and improving connections with other regions, OFA submits that while tourism in farm areas is an important part of the agri-food system, promotion of tourism could help the agricultural community by providing guidelines for tourists who may not be familiar with agricultural areas. This guidance could include language around biosecurity, the importance of not handling livestock, trespass, and damage to crops like canola and sunflower fields trampled by tourists looking for a photo opportunity.

We want tourists to visit agri-food establishments, but we want them to do it safely and productively so that a positive experience is enjoyed by all. We recommend advising tourists to stick to routes such as those depicted in 'Buy Local' maps and other tourism resources, including language around safely approaching or overtaking slow moving farm vehicles in tourism and MTO resources.

OFA supports a comprehensive, regional transportation system which considers agriculture. Using a wholistic approach, including agricultural systems when considering methods to enhance, streamline, and improve transportation policies, and shifting non-agricultural traffic to other corridors, will improve safety, reduce greenhouse gas emissions, and enhance food security.

Sincerely,



Peggy Brekveld,  
President

CC The Honourable Carolyn Mulroney, Ontario Minister of Transportation  
The Honourable Lisa Thompson, Ontario Minister of Agriculture, Food and Rural Affairs  
OFA Board of Directors