



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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December 14, 2016

Ms. Arielle Mayer, Senior Policy Advisor  
Ministry of Transportation  
Policy and Planning Division  
Transportation Planning Branch  
Environmental Policy Office (Toronto)  
777 Bay Street, Suite 3000  
Toronto, ON  
M7A 2J8

Dear Ms. Mayer;

**Re: EBR Registry 012-8890 Northern Ontario Multimodal Transportation Strategy Discussion Paper: Towards a Northern Ontario Multimodal Transportation Strategy**

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 36,000 family farm businesses across Ontario. These farm businesses form the backbone of our robust food system and rural communities with the potential to drive the Ontario economy forward.

The Discussion Paper asks if priority issues have been appropriately identified in this paper. For the most part, our answer would be yes, the paper does address the big picture issues. That being said, OFA believes that the Discussion Paper overlooks several issues that are critical for Northern Ontario farmers. In particular, a road network, including bridges and roundabouts, that enables the free, unhindered movement of large farm vehicles from farm to farm was not identified.

Ontario agriculture is a major economic driver for the province; \$12.7 billion in farm cash receipts (2014), with over 770,000 Ontario jobs in farming and food processing. Northern Ontario agriculture is of growing importance to the Ontario agri-food sector.

The 2,600 farms in Northern Ontario generate \$192 million in annual farm cash receipts and support approximately 4,000 jobs.

OFA recognizes the vast geography of Northern Ontario, and the challenges it presents, not only to Northern Ontario residents and businesses, but also to governments building and maintaining the infrastructure necessary to support the region's economic and social growth and development.

**Chapter 2: Vision and Objectives:**

OFA supports the vision statement and planning objectives. We propose no changes to either the vision statement or the planning objectives.

However, OFA is extremely disappointed that the Discussion Paper has overlooked agriculture's role in underpinning economic and employment growth across Northern Ontario. We view this oversight as unacceptable.

### **Chapter 3: Supporting Northerners in Daily Living: & Chapter 4: Supporting Industry:**

It is difficult to separate the day-to-day transportation needs of farmers as residents of Northern Ontario from their day-to-day transportation needs as farm business operators in Northern Ontario. We have opted to combine our comments on Chapters 3 and 4 together.

Ontario's 511 system provides information on road closures, winter road conditions and construction projects. OFA believes that this service can better serve road users by ensuring that both Ministry of Transportation and Ontario Provincial Police offices are fully linked into the system. System users will then have access to up-to-the-minute updates on road closures, winter road conditions and construction projects. Readily accessible information will enable road users to better plan trips or respond to road closures and winter road conditions. OFA recommends expansion of the service across Northern Ontario's provincial highways.

The Discussion Paper also notes that there are a number of sections of provincial highway with no cellphone service. From a public safety and emergency response perspective, this admission is unacceptable in the 21<sup>st</sup> century. OFA recommends that the Ontario government work to ensure that all provincial highways have reliable coverage for cellphone service.

The safe and unhindered movement of people and goods into, out of, and between centers in Northern Ontario is critical to the region's long-term economic growth and prosperity. OFA recommends improvements to the highway network to improve its reliability and resiliency.

The Discussion Paper highlights the four points along Highways 11 and 17 with no redundancy. OFA recommends immediate action to rectify the lack of redundancy at the four points identified along Highways 11 and 17.

In our earlier comments on a Northern Ontario Multimodal Transportation Strategy, we advocated that the Ministry of Transportation add and/or develop year-round rest stops, accessible by large trucks as well as passenger cars, at regular intervals along Ontario's provincial highways. Drivers, regardless of the type of motor vehicle they are operating, would benefit from a network of year-round rest stops at regular intervals, where they could change drivers, or refresh themselves with a short break from driving, in an off-highway setting. OFA recommends that the Ministry of Transportation initiate the construction of a province-wide network of year-round rest stops.

OFA supports the development of more 4-lane sections along the region's key highways, to enhance the movement of both people and goods. We foresee more 4-lane sections improving overall road safety. In some areas of Northern Ontario, 4-lane sections of road have made the cross-highway movement of slow moving farm vehicles a difficult challenge. Where widening a 2-lane highway to 4 lanes negatively impacts the cross-highway movement of slow moving farm vehicles, OFA recommends that the Ministry of Transportation provide service roads parallel to the heavier travelled 4-lane sections to accommodate local, slow-moving farm vehicle traffic.

In areas where 4-lane sections may be a longer-term outcome, the development of passing lanes at regular intervals would enhance road safety.

It has been drawn to our attention that bridge repairs, where one lane of traffic is closed, can negatively impact local farm vehicle traffic. Many pieces of farm equipment are wider than other motor vehicle configurations. Single lanes that can accommodate the full range of motor vehicle configurations many be unable to accommodate local farm vehicle traffic. If there are no alternative local roads that can accommodate farm vehicles, farmers may be unable to access some of the properties that they farm. When planning and scheduling bridge work, OFA recommends that the Ministry of Transportation must provide readily accessible alternate routes around these bridges that can accommodate large farm vehicles and that are available at agriculture's peak activities; planting and harvest. To facilitate this, side roads must also be wide enough to accommodate large farm vehicles.

As previously noted, there is no mention in the entire paper of the role of agriculture and agri-food processing in economic development and employment in Northern Ontario. How can the Ministry of Transportation and the Ministry of Northern Development and Mines formulate a comprehensive Northern Ontario Multimodal Transportation Strategy without considering the transportation system needs of its key sectors?

While marine transportation is not a major alternative for Northern Ontario farmers, it is growing in importance. As noted in the Discussion Paper, Western Canadian farmers depend on Great Lake ports, Thunder Bay in particular, for grain shipments. OFA recommends that Great Lake ports be dredged to ensure that ships can arrive and leave fully loaded.

#### **Chapter 5: Remote Communities:**

OFA offers no comments on this section.

#### **Chapter 6: Climate Change and Ecosystem health:**

Road authorities (MTO and/or municipal) are deepening their road ditches. As ditches are dug deeper, the width of the shoulders of roads are reduced, making the movement of large farm vehicles increasingly difficult. These vehicles often depend upon the shoulder in addition to the travelled portion, for safe passage. OFA recommends that the full width of the road allowance be utilized to accommodate the travelled portion, shoulders and ditches.

#### **Chapter 7: Emerging Strategic Directions to Consider:**

A key proposal in the government's recently concluded Coordinated Land Use Planning Review was the proposed requirement to utilize Agricultural Impact Assessments to assess the impacts of non-agricultural development on agricultural operations. One can envision these as assessing a proposed project's impacts through an agricultural lens, similar to an environmental assessment, but focused on agriculture. OFA viewed the adoption of Agricultural Impact Assessments as a significant step forward. When designing new roads, or upgrading current ones, OFA recommends that an Agricultural Impact Assessment be used to assess the needs of local agriculture and the possible impact to that community from highway projects. Ontario's road system (highways, local roads, bridges, roundabouts) must be designed to facilitate the free movement of farm vehicles where farming is an ongoing activity. OFA recommends that the Ministry of Transportation develop design standards that facilitate the free movement of farm vehicles, and that the Ministry utilizes Agricultural Impact Assessments to assess the impacts of highway projects not only on individual agricultural operations but also on the broader agricultural community.

OFA reiterates its recommendations for full cellphone coverage of all provincial highways in combination with enhancements to the 511 message system.

We look forward to continuing to work with the Ministry of Transportation and the Ministry of Northern Development and Mines to ensure ongoing support and enable growth of the agriculture sector when developing the Multimodal Transportation Strategy.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Currie", is written over a light grey rectangular background.

Keith Currie  
President

cc: The Honourable Steven Del Duca; Minister of Transportation  
The Honourable Michael Gravelle; Minister of Northern Development and Mines  
The Honourable Jeff Leal; Minister of Agriculture, Food and Rural Affairs  
OFA Board of Directors