



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

100 Stone Road West, Suite 206, Guelph, Ontario N1G 5L3  
Tel: (519) 821-8883 • Fax: (519) 821-8810 • [www.ofa.on.ca](http://www.ofa.on.ca)

December 15, 2017

Ms. Katerina Minaeva, Senior Policy Analyst  
Ministry of Transportation  
Policy and Planning Division  
Transportation Planning Branch  
Environmental Policy Office  
777 Bay Street, Suite 700  
Toronto, ON  
M7A 2J8

Dear Ms. Minaeva;

**RE: EBR Registry Number 013-1515 Greater Golden Horseshoe Transportation Plan**

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 37,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

OFA's affiliated federations of agriculture in Brant, Dufferin, Durham, Haldimand, Halton, Hamilton, Kawartha Lakes, Niagara, Northumberland, Peel, Peterborough, Simcoe, Waterloo, Wellington and York have a direct stake in this issue. Furthermore, farmers beyond the Greater Golden Horseshoe (GGH) depend on food processing facilities in the GGH, making an efficient, effective transportation system vital.

It is curious that the Greater Golden Horseshoe Transportation Plan is silent on the provinces proposed high speed rail line from Toronto through Guelph and Kitchener, and onto London, Chatham and Windsor. We ask, why?

While much has been written and said about the "benefits" of high speed rail, there has been no acknowledgement of the impacts on the rural/agricultural areas west of Toronto where the line would be built. Farms and local roads will be severed. Farmlands will be lost for the right-of-way. How can the Ministry of Transportation undertake the development of a Greater Golden Horseshoe Transportation Plan without considering the negative consequences of the proposed High-Speed Rail line on the rural and agricultural communities between its proposed stations?

**Question 1: Taken together, how well do the goals below reflect what's important to you for the future transportation system in the GGH?**

From the perspective of farmers and farm businesses across the GGH, the goals have a decidedly urban focus and thrust. While we acknowledge that reducing our reliance on personal vehicles is an appropriate objective and that most people and jobs in the GGH are urban-based, it nevertheless ignores the reality that significant portions of the GGH are outside its major urban centers.

Approximately 44% of the overall area of the GGH is farmland. The farm products produced not only on GGH farm, but also on farms outside the GGH, are processed in facilities located in the GGH, making it the number 2 food processing cluster in North America. The GGH accounts for approximately 65% of Ontario's agri-food jobs. The agri-food sector is a key employer and economic driver of the region, and the province. The Greater Golden Horseshoe Transportation Plan needs to reflect this in its overall focus.

Facilitating goods movement from farms to processing facilities is critical. Recognizing that roads are the principle means of moving farm products to processing facilities is equally critical. The Objective, "a well-connected road and highway network supports the movement of people and goods throughout the region" under the overall goal of a Connected transportation system encapsulates the needs of the rural areas of the GGH and beyond. But the reality of this is lacking. Farmers are faced with roundabouts that were not designed to accommodate today's farm equipment, even though a simple computer program can address this.

For some farmers who farm lands in the vicinity of Highway 115 near Peterborough, the shortest route between these farm parcels would include travel on a short stretch of Highway 115. Being denied access to Highway 115 for lands on opposite sides of the highway that are only about 1 mile apart, results in a 25-mile detour, or through downtown Peterborough. Facilitating goods movement begins at the individual farm level, and moves outward. The road network within the Greater Golden Horseshoe, and beyond, must work for all GGH residents, including the regions farm families.

### **Proposed Goals:**

#### **Healthy:**

Having a transportation system supports walking and cycling is a laudable objective for people who live and work in an urban environment, but this objective is unrealistic for residents in the GGH's rural and agricultural areas, where narrow roads lack sidewalks, room for bicycle lanes and shoulders, are and used by large farm equipment in addition to personal vehicles and delivery vehicles.

With respect to access to recreational trails, farmers whose lands are adjacent to these trails routinely face a range of challenges, from where to trail users park their vehicles, so that large farm equipment can freely pass down these roads to challenges related to trespass and liability, litter, dogs-at-large and interference with normal farm practices. The requisite infrastructure to support recreational trails to ensure they do not negatively impact rural residents and rural businesses is an absolute necessity.

#### **Equitable:**

The draft Greater Golden Horseshoe Transportation Plan will only be truly equitable if the rural to urban linkages are recognized, developed and supported. As noted, this plan presents a decidedly urban focus and bias. We understand that most of the residents and businesses in the GGH are urban-based. Nevertheless, without making the overall transportation system accessible to all users, regardless of whether they live and work in an urban or rural setting, the plan will fail.

**Environmentally sustainable:**

Transportation infrastructure of all modes; road, rail, air, water, have been and will continue to be imposed on the landscape, where they negatively impact aspects of the natural environment as well and the human-altered landscape. Yes, we need to reduce our energy use, preserve our natural resources and reduce societies impacts on agricultural lands. All these elements speak to environmental sustainability.

**Economically responsible:**

From the perspective of rural/farm residents, the transportation system needs to provide for rural residents who choose to use public transit, enabling them to park at transit stations. Not having adequate parking at public transit stations, such as GO Transit, defeats the purpose of public transit and removes the public transit option from rural residents, further exacerbating traffic congestion in urban areas.

**Resilient:**

The draft GGH Transportation Plan makes no mention of resilience in the context of adaptation to changing technologies as well as incorporating flexibility to change schedules and routes in response to changing user needs.

**Prosperous:**

Yes, the system should support economic growth and job creation. However, again we see a focus and objectives that ignore the non-urban portions of the GGH by the emphasis on airports; ports and border crossings. While these are key considerations, they should not be the sole focus of the GGH Transportation Plan.

**Integrated:**

Again, yes, but only when the rural component is included. Ontario's economic prosperity and resilience depends on including the region's and Ontario's rural and agricultural areas, a key driver of the Ontario economy.

**Connected:**

The document seems to focus on international and city to city connections to the exclusion of rural or urban connections. The GGH is home to most of Ontario's food processing facilities, meaning that the farm to processor component of goods movement is critical, but sadly overlooked. The GGH Transportation Plan must accommodate the needs of the region's farm families too.

**Question 2: Would you change any of the existing goals or add any new goals? If so, what would you change or add?**

OFA recommends that the Plan add; policy 3.2.2.2(e) from the recently revised *Growth Plan* for the Greater Golden Horseshoe, which requires transportation planning that can "accommodate agricultural vehicles and equipment, as appropriate". Nowhere in the draft goals and objectives is there any mention of this policy directive. Throughout the rural portions of the GGH and beyond, farmers require a road network that does not impede the farm to farm movement of farm vehicles.

These vehicles are becoming quite large, width being the key element. Wider than normal vehicles have trouble negotiating bridges with barriers close to the edge of the travelled portion. Roundabouts or traffic circles are also challenging for large farm vehicles, which, if not designed to accommodate farm vehicles, can restrict their movement.

Also recognize, and incorporate Agricultural Impact Assessments (AIAs) into planning and developing an efficient, effective transportation system not only for the Greater Golden Horseshoe area, but throughout all of Ontario.

**Question 3: Which goals do you think are the most important for a well-planned transportation network?**

Listed Goals: Healthy, Equitable, Environmentally Sustainable, Economically Responsible, Resilient, Prosperous, Integrated & Connected

From OFA's perspective, the most important goals would be, in our order of importance, Connected, Integrated, Economically Responsible and Equitable. In combination, these four speaks to a transportation network that serves the regions residents and businesses, regardless of where throughout the regions they live, work or operate. A transportation system that fails to serve urban and rural uses, personal and business users, as well as people and businesses outside the Greater Golden Horseshoe, but whose interests and needs lie in ready access to the region.

**Question 4: Under each goal, which objectives are most important for a transportation system that achieves that goal?**

OFA views the following Objectives as most important.

Connected:

- People and goods are able to move efficiently with minimal delay
- A well-connected road and highway network supports the movement of people and goods throughout the region
- It is easy to travel between urban and rural areas by a range of transportation options (road, transit, cycling, water, rail, etc.)

Integrated:

- Major goods movement related to industries are supported by an efficient multi-modal system of roads, rail, ports and airports

Economically Responsible:

- The transportation system is affordable top operate and maintain

Equitable:

- Reliable and frequent transit services are available to all users regardless of where they live



On behalf of our more than 36,000 farm family businesses across Ontario, I thank you for the opportunity to present OFA's perspectives on the Greater Golden Horseshoe Transportation Plan.

Sincerely,

A handwritten signature in black ink, which appears to read 'Keith Currie', is positioned below the word 'Sincerely,'.

Keith Currie  
President

KC/pj

cc: The Honourable Steven Del Duca, Minister of Transportation  
The Honourable Jeff Leal, Minister of Agriculture, Food and Rural Affairs  
OFA Board of Directors