



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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March 6, 2018

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

Dear Ms. Minaeva;

**RE: EBR Registry No. 013-1837 #CycleON: Action Plan 2.0**

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 will provide some general comments and suggestions related to the stated action items.

1) Design Healthy, Active and Prosperous Communities

The OFA is a strong advocate of effective land use planning, with our primary focus being on the preservation of Ontario's agricultural lands for their ability to produce food, fibre and fuel, not only for Ontarians but also for consumers beyond our borders. We acknowledge the actions listed under this heading but emphasize that actions to advance these must be made in the context of protecting "prime agricultural areas for their long-term use in agriculture". (PPS 2.3.1) From our perspective, that means that the proposed actions listed here must not negatively impact farmers and their ongoing ability to produce food, fibre and fuel while utilizing normal farm practices.

Farm equipment is afforded unfettered access to the majority of Ontario's provincial highways and municipal roads.

2) Improve Cycling Infrastructure

Improvements to our cycling infrastructure cannot come to the detriment of other road uses, including farm equipment on the roads; an all too often overlooked reality.

One of the proposed action items under this theme relates to updating the Ontario Traffic Manual Book 18: Cycling Facilities. The current version, dated 2013, completely overlooks on-road use by farm equipment, therefore also overlooking the challenges for both farmers and cyclists in sharing the roads. Today's farm equipment is both wide and long, adding to the challenges of sharing the roads not only with cyclists, but with cars and trucks too. OFA strongly recommends

that any revisions to the Ontario Traffic Manual Book 18: Cycling Facilities include guidance and advice to road authorities applicable to sharing roads used by cyclists, farmers and the general public.

### 3) Make Safer Highways and Streets

We all see a need for safer highways and streets. In our 2017 comments, we wrote, “*when it comes to cycling, we note that cyclists and farm equipment share some similarities. Both share roads that are primarily used by vehicles operated by people that are unfamiliar with the rules governing either cyclists or farm equipment. Public education regarding shared roadway safety would also be valuable. In addition, cyclists should be encouraged to wear highly visible clothing, to makes themselves as conspicuous as possible*”. We continue to see a definite need for improved public education related to sharing the roads, with a particular emphasis on sharing the roads with cyclists and farmers. Furthermore, we recommend that the Ministry of Transportation add a section to its FARM GUIDE available to farmers about proper interaction with cyclists using roads frequented by farm vehicles.

### 4) Promote Cycling Awareness and Behavioural Shifts

Cyclists using roads frequented by farm vehicles face unique challenges. The large size of today’s farm equipment makes it difficult for farmers to see cyclists. For cyclists, and other road users too, the size of farm equipment, combined with the tendency to turn off the road at seemingly random spots, presents challenges. Better education of cyclists, along with other users of Ontario’s rural highways and roads should help.

### 5) Increase Cycling Tourism Opportunities

Regional Tourism Organizations should provide information to prospective cycling tourists on sharing the roads with large farm equipment.

The Ontario Federation of Agriculture appreciates the opportunity to provide its perspective on this posting; #CycleON: Action Plan 2.0. We look forward to seeing our recommendations reflected in the document’s final version.

Sincerely,



Keith Currie  
OFA President

KC/pj

cc: The Honourable Kathryn McGarry; Minister of Transportation  
The Honourable Jeff Leal; Minister of Agriculture, Food and Rural Affairs  
OFA Board of Directors