

March 17, 2020

Ms. Cheryl Davis
Environmental Policy Branch
Ministry of Transportation
Suite 700
777 Bay Street
Toronto, ON
M7A 2J8

Dear Ms. Davis;

RE: Environmental Registry of Ontario posting 019-1097 Connecting the Southwest: A Draft Transportation Plan for Southwestern Ontario

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 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 welcomes this opportunity to provide its comments and perspective on the Draft Transportation Plan for Southwestern Ontario.

Getting People Moving and Connecting Communities (#1):

Rural and agricultural areas of Ontario, including the municipalities in Southwestern Ontario that are the specific focus of this Draft Transportation Plan are highly dependent on private motor vehicles for their transportation needs. Population densities are too low to support any form public transportation system. That being said, we do recognize that establishing and enhancing intercommunity public transportation systems where population densities are sufficient will serve as a start to reduce dependence on private motor vehicles and offer residents across the region an alternative to their private vehicles to travel from town to town for medical appointments, visiting family and friends, shopping, etc. OFA supports the proposed actions to get people moving and better connect communities throughout the region.

OFA recommends that the interests of the agricultural community be represented on the government's proposed Task Force on transportation integration. This proposed task force will help better coordinate bus, rail and transit services and meet local needs. Having a task force member from the agricultural community would bring an important perspective to the table, particularly the impact on the movement of farm equipment between farmland parcels, the delivery of farm inputs, the shipping of farm products, as well as the commute of farm workers to and from farms.

- **funding for Connecting Links program**

The Ministry of Transportation, in partnership with municipal road authorities needs to ensure that upgrades and/or repairs to road infrastructure (i.e. roads & bridges) are done in a manner that allows for the free movement of large farm vehicles along these roads and across these bridges. Too often have we have heard from OFA members from across the province that repairs to bridges sometimes left the width between railings too narrow to allow farm vehicles to cross, necessitating long, costly and time-consuming detours to avoid bridges that are too narrow to allow farm vehicles to pass over them. In addition, traffic circles or roundabouts on roads frequented by farm vehicles must be designed to allow large farm vehicle to freely pass through them. Much of the design guidance on traffic circles or roundabouts is focussed on the ability of 53-foot tractor trailer combinations to safely pass through. While this is a critical consideration, for farm equipment, the operational width is the more critical dimension. Traffic circles with hard 90° curbs, single lands or no “run up” island in the center impede the movement of farm vehicles. To enhance and sustain the profitability of farms, farmers need a road network that facilitates that unrestricted movement of inputs onto farms (i.e. seed, feed, fuel, fertilizer, etc.) as well as the off-farm movement of farm products destined for food processing facilities, food markets, food retail outlets, etc. OFA recommends that the Ministry of Transportation mandate that all traffic circles or roundabouts on roads frequented by farm vehicles must be designed to allow large farm vehicle to freely pass through them.

- **continue to ensure Ontario’s ferry services connect communities (Pelee Island)**

Farmers depend on the Pelee Island ferries to transport seed and fertilizer onto the island for their crops, and to transport harvested grains and wines off the island. Several years ago, problems with the two ferries negatively impacted farming operation son the Island. Pelee Island farmers require reliable and affordable ferry services to ensure the viability and sustainability of their farms. Assurances that farmers, as well as island resident and visitors will continue to be served by reliable ferry service are welcomed.

Supporting a Competitive Open for Business Environment (#2):

OFA is troubled by no mention of retaining the Glanworth Drive overpass over Highway 401 west of London in the draft transportation plan. OFA and the Elgin and Middlesex Federations of Agriculture were pleased to hear from your government that it would retain the Glanworth Drive overpass as part of upgrades to the Highway 401/Highway 4/Colonel Talbot Rd. interchange. The Glanworth Driver overpass provides farmers a route from their vegetable farms south of Highway 401 to food processing facilities in Strathroy for slow moving farm vehicles. The Glanworth Driver overpass is vital road infrastructure that keeps these slow moving vegetable transport vehicles off the more heavily travelled Highway 4/Colonel Talbot Rd. OFA demands assurances that the Glanworth Drive overpass is and integral part of upgrades to the Highway 401/Highway 4/Colonel Talbot Rd. interchange.

- **double the number of lanes on Hwy 3 between Essex and Leamington**

While we do not oppose the proposed widening of Highway 3 between Essex and Leamington, we do note that farmers in that area have expressed concerns about trying to cross a 4-lane highway with large, slow moving farm vehicles. Some have suggested that traffic lights be put at County Road 27 (Belle River Road). There are two agricultural support businesses in the vicinity of the Highway 3 and County Road 27 intersection. Agris Coop between Highway 3 and Cottam, while Setterinton’s Fertilizer Service has one of their locations on the McCain Sideroad off County Road 27. Traffic lights at the Highway 3/County Road 27 intersection would enable farm vehicles

travelling to and from these two facilities to safely cross Highway 3, predominately in the Spring and Fall.

OFA recommends that an Agricultural Impact Assessment be required for all Environmental Assessments when the project has the potential to impact agriculture. Along with consulting with the impacted agricultural community, an Agricultural Impact Assessment should also include the following:

- Recognize agriculture as a business as well as a land capability class
- Include agribusiness as a category of business to be studied
- Require consulting teams to have/or consult with an agricultural specialist when agricultural land and Agribusinesses may be impacted.
- Require all draft documents/maps prepared by consultants for each public review and comment period to be revised in the form of a final report for each phase and made available to the public prior to initiating the next phase of the study.
- Require all mapping data used in Environmental Assessment (EA) studies to be up to date.
- Require all Public Information Centres (PICs) to have an open public discussion period following each consulting team presentation.

- **simplify and modernize commercial trucking regulations**

OFA supports the Ontario government's efforts to remove unnecessary and burdensome red tape. OFA supported amendments to enable owners of heavy-duty diesel commercial motor vehicles to obtain both an emissions and safety inspection at the same time and at the same location. OFA believes this change will help address the shortage of emissions testing facilities experienced by farmers in Ontario's agricultural and rural areas.

With respect to the proposed action item to simplify and modernize regulations to support the trucking industry, OFA requires the Ministry to state their proposed regulatory amendments before we can review and assess any impacts affecting farmers and their farm operations. We do note that we would oppose any commercial trucking regulatory amendments that would compromise road safety.

- **in cooperation with municipalities, review the rules around reduced load periods (aka ½ load seasons) for the agricultural, agri-business and trucking industries**

OFA supports this action item to review the rules regarding reduced load periods to help cut red tape and support businesses.

The seasonal reduced load period weight restrictions have been the source of ongoing angst. The types of trucks that are granted more weight per axle than other types, or the ones that have total exemptions do not reflect trucks used to transport fuels, live poultry or milk in the 21st century. And if we allow a truck to transport more weight/axle when carrying live poultry, why do we not extend the same provisions to trucks transporting cattle, sheep, etc.?

Transporting certain types of seed, soybeans for example, must be done when there is little to no risk of frost or cold temperatures, as these conditions will damage the seed. Soybean seed cannot be trucked on the farm before the seasonal reduced load period begins as they cannot be stored in an unheated building.

The seasonal reduced load period weight restrictions serve as an impediment to an “open for business” environment. Critical goods movements simply cannot be done in a timely and cost-efficient manner; more trucks making more trips is bad economically and bad environmentally.

Improving Safety (#3):

- **work in partnership with private landowners to plant more and better snow hedges**

If MTO is thinking about snow hedges located back in fields that abut a highway right-of-way, OFA is categorically opposed to the concept. A permanent hedge in one’s field reduces the amount of land available from cropping or pasture. It would interfere with the movement of seeding, fertilizing and harvesting equipment; likely adding costs to the farmer.

Providing More Choice and Convenience (#4):

OFA offers no comments on this section of the Draft Transportation Plan for Southwestern Ontario.

Preparing for the Future (#5):

OFA offers no comments on this section of the Draft Transportation Plan for Southwestern Ontario.

OFA welcomes this opportunity to provide its perspectives and thoughts on Connecting the Southwest: A Draft Transportation Plan for Southwestern Ontario.

Sincerely,



Keith Currie
President

KC/pj

cc: The Honourable Caroline Mulroney, Minister of Transportation
The Honourable Ernie Hardemen, Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors