

August 14, 2020

Ms. Antonia Testa
Special Project Officer
Project Coordination – Team 2
Ministry of Environment, Conservation and Parks
135 St. Clair Avenue West
Toronto, ON M4V 1P5

Dear Ms. Testa,

RE: ERO 019-1883 Proposal to exempt various Ministry of Transportation projects from the requirements of the Environmental Assessment Act.

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.

Agricultural Impact Assessments (AIAs) are referenced in A Place to Grow: Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan and the Provincial Policy Statement as studies *“that evaluate the potential impacts on non-agricultural development on agricultural operations and the Agricultural System and recommends ways to avoid, or if avoidance is not possible, minimize and mitigate adverse effects”*. OFA firmly believes in the widespread use of AIAs to ensure that any negative impacts of proposed developments are first avoided, then minimized and lastly mitigated. Ontario's agricultural lands are a finite and shrinking resource that all Ontarians benefit from, not only for the ability of these lands to provide us with a secure supply of safe, affordable and environmentally sustainable food, fibre and fuel but also for the concurrent environmental and ecological goods and services that all Ontarians derive from our agricultural lands, in alphabetical order, include; aesthetic and recreational space, air quality, including oxygen production, biodiversity, carbon sequestration, climate change mitigation, nutrient cycling, pollination services, soil erosion control, water cycling (purification, retention, flood mitigation, groundwater recharge), and wildlife and endangered species habitat. OFA strongly recommends that despite the desire to streamline environmental assessments or exempt various Ministry of Transportation projects from environmental assessments, that agricultural impact assessments be an integral part of project planning, design, and construction.

Most of the identified highway projects identified in ERO 019-1883 involve highway segments that are not controlled access highways. For those projects, OFA requests that final design of traffic circles or roundabouts must allow for the safe passage through of modern farm equipment, which is both longer and wider than 53-foot tractor trailer combinations, the usual default vehicle combination. The major farm equipment manufacturers, Deere, Case IH, Massey Ferguson, etc. can provide turning radius templates for their farm vehicles, to enable engineers to design

roundabouts and intersections that allow the unhindered passage through of 21st century farm equipment. We further request that highway engineers consider modern farm equipment widths when designing bridges and roadways in areas of our province where farm equipment uses these highways to travel from farm to farm.

OFA appreciates this opportunity to provide an agriculturally focused response to ERO 019-1883, with an eye to seeing the Ministry of Transportation's highway design criteria reflect farm vehicle usage of provincial highways.

Sincerely,



Keith Currie
President

KC/pj

cc: The Honourable Jeff Yurek, Minister of the Environment, Conservation and Parks
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
The Honourable Caroline Mulroney, Minister of Transportation
OFA Board of Directors

