

March 10, 2021

System Planning Office
System Planning Branch, Integrated Policy and Planning Division
Ministry of Transportation
Suite 700, 777 Bay Street
Toronto, ON
M7A 2J8

Submitted online and emailed to: NorthernTransportationPlan@ontario.ca

Dear System Planning Office:

RE: 019-2830 - Connecting the North: A Draft Transportation Plan for Northern Ontario

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted, and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA welcomes this opportunity to comment and provide an agricultural perspective on the Draft Transportation Plan for Northern Ontario.

Impacts of COVID-19

COVID-19 has had a significant impact on all modes of transportation. Combined with reduced consumer travel and tourism, the pandemic has severely diminished the financial viability of air, marine, rail and commuter transport in Northern Ontario. Service reductions have the potential to severely affect Northern Ontario and remote communities with limited or no year-round road access.

The pandemic has emphasised the importance of having a reliable transportation infrastructure plan in Northern Ontario, critical to the supply chain, ensuring food security, access to services, and vital for sustaining economic development.

Goals Set Out in the Draft Transportation Plan for Northern Ontario

Goal 1: Getting people moving and connecting communities

Residents and businesses that are the focus of the Draft Transportation Plan for Northern Ontario are highly dependent on personal vehicles. This reliance is more acute than for any other region of Ontario. Population densities are too low to support public transportation systems. Creating and improving inter-community public transportation, where sufficient population numbers can support investments, is a good place to begin. This will reduce dependence on private vehicles and offer people across the region an alternative way to access healthcare, education, personal interaction, and shopping.

OFA supports the proposed actions to get people moving and to better connect communities throughout the region. With a thinly structured transportation network in Northern Ontario, OFA supports efforts to strengthen schedule links, fare integration and co-location of transportation facilities to improve connections, service and travel options.

Public transit in northern Ontario underserved communities requires flexible community assistance. OFA supports Ontario's continuation of the Ontario Community Transportation Grant Program to help connect residents to transportation services in communities across Ontario. In addition to 13 southern Ontario municipalities, the pilot program helped 9 Northern Ontario municipalities and community agencies leverage investments to solve transportation problems.

The current phase of the Ontario Community Transportation Grant Program provides \$30 million to 39 municipal governments for transportation solutions tailored to their community needs, eventually intending to lead to stable Ontario Gas Tax for Transit Program funding. Continuation of Community Transportation Grants, including the 9 Northern Ontario municipal grants is an important step in helping deliver and sustain needed transit solutions for northern Ontario residents and communities.

Ontario's Gas Tax Program requires that all provincial gas tax funding be used for public transit. This effectively excludes northern and rural municipalities without public transit systems from receiving any of the gas tax funding. This is in stark contrast to the federal gas tax program which provides funding on a per capita basis and allows municipalities the choice to spend the funding on a wide range of infrastructure projects, based off local needs. Under the current Ontario Gas Tax Program, motorists who pay for gas and drive in rural Ontario are subsidizing urban transit users. To ensure all municipalities equally share in the provincial gas tax funding to address critical infrastructure projects, OFA recommends the provincial gas tax funding criteria be revised to align with the federal gas tax funding criteria.

Establishing even a small rural transit system is a major undertaking for most municipalities especially without a critical mass of riders and funding to support them from the start. OFA supports actions to continue delivering new municipal transit systems in rural and northern Ontario including grants to establish transit programs.

Centralizing oversight of agencies delivering transportation services should create efficiencies. OFA supports the transfer of Ontario Northland Transportation Commission management to MTO from the Ministry of Energy, Northern Development and Mines.

To best consider highway, road and bridge planning, improvements, and construction, and improving bus, train, and rail service, OFA recommends that the interests of the agricultural

community be represented on the government's proposed Task Force on Transportation Integration. Having a task force member from the regional agricultural community will bring an important perspective, particularly related to the movement of farm equipment between farmland parcels, commercial supply chains, shipping of farm inputs and production, and farm employee commutes.

OFA recommends the Ministry of Transportation partner with municipal road authorities, to ensure infrastructure upgrades and repairs allow for the uninterrupted movement of large farm vehicles along roads and across bridges. Unfortunately, we often hear from OFA members across Ontario that repairs to bridges have left the width between railings too narrow to allow farm vehicles to cross, necessitating long, costly, and time-consuming detours to avoid narrow bridges.

Any plans for roundabouts on roads frequented by farm vehicles must be designed to allow large farm vehicles safe transit. Typical design guidance only considers the ability for a 53-foot-long tractor trailer combination to safely pass through a roundabout. While this length is a critical consideration, for farm equipment, the operational width is the essential dimension. Roundabouts with hard 90° curbs, single lanes or no "run up" island in the center, impede the movement of farm vehicles.

To enhance and sustain farm profitability, farmers need a road network that facilitates unrestricted transport of inputs to farms and farm production delivery to food processing facilities, wholesalers, and retail outlets. OFA recommends that the Ministry of Transportation mandate that all traffic circles and roundabouts on roads frequented by farm vehicles be designed to allow large farm vehicles to freely move through them.

Goal 2: Enabling economic opportunities

OFA supports provincial commitments to invest in the economic recovery, such as highway rehabilitation projects to help stimulate local economies. While we generally do not oppose widening of key transport route highways, many farmers are concerned about crossing widened highways with large, slow moving farm vehicles. OFA recommends an assessment to determine if and where traffic lights may be valid for safety concerns.

OFA recommends an Agricultural Impact Assessment be required for all Environmental Assessments (EAs) on projects that potentially impact agriculture. Along with consulting impacted agricultural communities, an Agricultural Impact Assessment should also:

- In addition to a land capability class, recognize agriculture as a business,
- 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 and maps prepared 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 EA mapping data used in studies to be current, and
- Require all Public Information Centres to have an open public discussion period following each consulting team presentation.

OFA supports efforts to simplify and modernize commercial trucking regulations and integrate emissions and safety testing throughout the province. This change will help address the shortage of emissions testing facilities experienced by farmers in Ontario's agricultural and rural areas.

We also support implementing digital solutions for operators to access CVOR renewals and permits. OFA recommends the Ministry work with Innovation, Science and Economic Development Canada and the Ontario Ministry of Infrastructure to address broadband and mobile data network deficiencies to ensure these digital modernization solutions are accessible in Northern Ontario.

In addition to funding supports such as the Northern Ontario Heritage Fund and the Ontario Broadband and Cellular Action Plan, more Private Public Partnership (PPP) investments are needed to ensure Northern Ontario has improved service. Significantly more dollars are needed to address underserved and unserved rural and Northern Ontario broadband and cellular service, especially last mile connectivity. Until service improves, we recommend the Ministry not *replace* fax and mail access, as indicated in the Draft, but implement these modernizations in *addition* to existing portals.

Goal 3: Keeping people safe and providing reliable transportation options

OFA supports actions to improve safety for travellers, especially along deserted corridors. OFA recommends consultations be led by Indigenous Peoples aligned with the National Inquiry into Missing and Murdered Indigenous Women and Girls report.

We support actions to improve winter highway safety, including pilots to inform winter maintenance standards. Related to helping contractors meet Ministry standards, OFA is opposed to the reliance on snow hedges located back in farm fields next to highway rights-of-way. A permanent field hedge reduces the amount of farmable land, and reduces or removes access for planting, cultivating and harvest equipment, resulting in delays and higher costs for farmers.

OFA supports Ministry actions to comply with the federal Railway Safety Act, to increase safety at public rail crossings. Public and private crossings are important to OFA members. Closing or restricting use of a crossing could result in a farmer not having access to fields for their farm machinery. OFA recommends MTO consult with agricultural community stakeholders to design and execute rail crossing updates.

OFA supports a review of passing lane needs in Northeastern Ontario where the highway network is predominately two lanes and recommends MTO consider reviewing areas along stretches of highway near farm communities with slow moving farm vehicles.

Goal 4: Preparing for the future

We support the introduction of actions to stimulate new and innovative technology in the transportation sector. As mentioned above under Goal 2: Enabling economic opportunities, we strongly recommend further government action to ensure last mile connectivity, an area where private industry is not incentivised to invest in broadband, data, and cellular infrastructure.

OFA supports Ministry actions to prepare transportation infrastructure for connected and automated vehicle technologies, and to review locations for electric and hydrogen fueling stations, that will eventually support private sector commercial transportation and fueling partnerships.

Goal 5: Maintaining a sustainable transportation system

OFA supports Ministry actions to consider the impact of climate change on roads and transportation infrastructure, and to address the threats and challenges of invasive vegetation species along highways. OFA supports continued construction of wildlife fencing, and actions to manage invasive phragmites along Ontario's highways and assessing.

OFA supports continuing projects to connect Indigenous communities in Northern Ontario to the electricity grid, replacing diesel fueled electricity generation.

Goal 6: Reliable travel options for remote and Far North communities

OFA supports initiatives to ensure the health, wellbeing, and economic independence of remote First Nations peoples.

OFA supports Ontario's commitment to collaborate with Indigenous, municipal, and other public and private sector partners to deliver on actions in the Northern Ontario Transportation Plan. We look forward to providing an agricultural perspective to these and any new and changing proposals the Ministry is considering.

Sincerely,



Peggy Brekveld
President

PB/in

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