

April 21, 2022

The Honourable Carolyn Mulroney  
Ontario Minister of Transportation  
777 Bay Street, Fifth Floor  
Toronto, ON  
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Sent via email to: [minister.mto@ontario.ca](mailto:minister.mto@ontario.ca)

Dear Minister,

I would like to extend my appreciation to you and your Ministry staff for the work and consultation invested in the design of the Greater Golden Horseshoe Transportation Plan. The corridor encompassing the GGH is the busiest and largest road transport system in North America, connecting commerce throughout the northeast continent with Canada's busiest air transport system, busiest commuter system and most populated region.

This network is vital to commercial and industrial sectors including the agriculture and agri-food sector. We were pleased that the plan recognizes that the GGH needs more than solutions to road congestion, and recognizes the importance of moving away from a system centred on Union Station as the only viable connecting hub.

We support improved regional commuter and commercial systems with better connections to GGH systems. With this realization comes impacts to rural communities. Balancing the needs of rural communities with the requirements of such a massive transportation system is complicated, to say the least.

While GGH Transportation Plan design considered alignment with other government initiatives, because of the impacts to rural and agricultural regions, we would like to see defined consideration for Ontario's *A Place To Grow: Growth Plan for the GGH* which distinguishes the agricultural system approach to maintain and enhance geographic continuity of the agricultural land base, and its functional and economic connections.

We were interested that government analysed variations in land use patterns to understand how land use could support the network's performance aimed to inform Plan policy decisions. While this analysis included industry sectors that would highly impact employment and associated impactors to the transportation system, we see that this analysis excluded agriculture, assuming lower impacts to employment and associated impactors compared to other industry sectors.

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Although it may be the case that farm businesses are small individual employers, they are broadly distributed throughout most regions of the province. OFA represents some 38,000 farm families and businesses in 51 counties. The Ontario agriculture and agri-food industry employs over 860,000 people and ensures the health and wellbeing of Canadians, including the 9.8 million living and working in the Greater Golden Horseshoe.

Regional infrastructure and transportation networks are important elements within the Agri-food network, a component of an Agricultural System as defined in the 2020 Provincial Policy Statement. Therefore, it is important the Ministry perform the land-use pattern analysis considering the agriculture and agri-food sector such that Ontario agriculture can remain the significant economic contributor that it is.

Agricultural Impact Assessments (AIAs) are studies that evaluate the potential impacts of non-agricultural development (including transportation corridors) on the Agricultural System and on individual agricultural operations. An AIA is used to identify and assess potential impacts from development on agriculture (including impacts to farmland, farm operations and the surrounding area; and within the Greater Golden Horseshoe impacts on the Agricultural System). AIAs can recommend measures or strategies to avoid impacts (e.g. consider alternative locations where possible) and measures to minimize or mitigate impacts (e.g. through site design, use of buffers). OFA recommends the Ministry commit to conducting AIAs at the design stage of MTO projects.

I look forward to further collaboration with you and your colleagues at the Ontario Ministries of Transportation, and Agriculture, Food and Rural Affairs, to ensure Ontario's regional Transportation Plans are best designed and implemented to benefit all Ontarians.

Sincerely,



Peggy Brekveld  
President

cc: The Honourable Lisa Thompson, Ontario Minister of Agriculture, Food and Rural Affairs  
OFA Board of Directors