

August 19, 2022

Katerina Downard
Ontario Ministry of Transportation
Environmental Policy Office
777 Bay Street, Suite 700
Toronto, ON
M7A 2J8

Via email to Katerina.Downard@Ontario.ca and upload to Environmental Registry

Dear Katerina Downard,

Re: ERO- 019-5259 Draft Transportation Plan for Eastern 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.

OFA is pleased to provide an agricultural perspective regarding the draft Transportation Plan for Eastern Ontario. Unique features of Eastern Ontario present challenges and opportunities for the agricultural sector and the larger Ontario economy. The draft Transportation Plan addresses many of these features including proximity to the GTA and Greater Montreal, and the expanse of farming and tourism throughout the region. Improvements to this multimodal transit corridor will ensure the movement of people, goods and services continue to benefit the entire country.

Farming In Eastern Ontario

OFA is dedicated to sustaining our farm communities. Eastern Ontario farms employ over 10,000 people in crop and animal production, however, we continue to lose farms in this region; the number of farms fell 7.4% (537 farms) since the 2016 Census of Agriculture. Primary to ensuring sustainable farming in Ontario is keeping arable land in production, and ensuring our farmers are able to operate in safe and healthy environments.

Rail Crossings

OFA supports Ministry efforts to adopt mitigation measures when upgrading major rail corridor crossings, so that farm equipment access to fields and farm operations is not impeded. Safe rail transport of agricultural goods to market is essential to the industry, as is safe access to

landlocked parcels via private crossings. Numerous farm properties have an active railway line passing through the farm and a private level crossing over the rail line that serves as the farmer's only means of access to fields on the opposite side of the tracks. Upgrading unsafe private crossings will keep farmers, their families and farm workers safe.

Earlier this year, many farmers with private grade crossings received letters and contracts from the Canadian National, and Canadian Pacific Railways outlining proposed maintenance work and costs apportioned to the farmer and a requirement for the landowner to purchase liability insurance as a result of Transport Canada's Grade Crossing Regulations. While OFA supports compliance with the Grade Crossing Regulations, these types of crossings used for farm purposes were historically designated as *farm crossings*.

Landowners of farm crossings have a statutory right to a crossing at the railway's expense, as farm crossings are typically only used seasonally or for agricultural activities and are not available for public use or access. Now, that distinction is no longer being made. Instead, all farm crossings are classified as private crossings – with the costs for upgrades and maintenance being downloaded to farmers and landowners. Depending on the crossing, those costs – and the liability insurance farmers must secure – can be substantial and far beyond what is considered an affordable expense. The refusal to comply with the outlined contract could result in the removal of the farm crossing. The OFA requests that the Ministry work with Canadian railway companies and Transport Canada to draw attention to the differences between farm and private crossings and the need to validate and verify the crossing to establish their status.

Class Environmental Assessments and Agricultural Impact Assessments

We support the Ministry recognizing the importance of conducting Preliminary Design and Class Environmental Assessments (EA) for planned Highway 401 and Highway 416 improvements, and updating the EA for other works such as the Highway 15 intersection in Crosby.

We also support the Ministry considering the movement and safety risks associated with large, slow-moving farm equipment and transportation of agricultural products to market in road and rail design, such as shoulder, curb and traffic circle design, speed limits and signage. One way to ensure consideration of normal farm activities is to ensure all transportation infrastructure projects include an Agricultural Impact Assessment (AIA) as a regular step in assessing projects.

While the Ministry noted the Eastern Ontario transportation plan will ensure farmers can move equipment where it needs to go while not impeding the local road network, AIAs will also ensure that road network design does not impede our farm community networks. It is important to keep an open dialogue on design and maintenance factors such as reducing road salt applications and maintaining correct water retention and drainage designs, to help preserve the integrity of our finite agricultural land sources.

Slow-Moving Vehicle Awareness

We are concerned about the risks farmers take when operating large slow-moving equipment on our roadways and the importance of raising awareness of safe driving practices all drivers must abide by to ensure we all make it home each day. We support the Ministry in recognizing the importance of this issue. The draft plan noted promotional partnerships with Destination Ontario and an ONroute Travel Information Centre on Highway 401. OFA recommends leveraging these types of tourism partnerships to help raise driver awareness of what to expect when they come upon farm machinery after exiting highways and arterial roads to reach their tourism destinations.

Large populations along Lake Ontario and Greater Ottawa travel throughout the eastern region to the Kawarthas, Muskoka, Ottawa River and Valley areas, and Prince Edward County. Collisions with SMVs are all too common when passenger vehicles and farm equipment meet on our roads. This year, OFA has begun a slow-moving farm vehicle safety awareness campaign. We look forward to working with colleagues from the Ministries of Transportation and OMAFRA to help raise awareness and reduce these dangerous collisions.

Sincerely,



Peggy Brekveld
President

cc: The Honourable Caroline Mulroney, Ontario Minister of Transportation
The Honourable Lisa Thomson, Ontario Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors