

May 27, 2024

Katerina Downard
Environmental Policy Office
Ministry of Transportation
438 University Avenue, 12th Floor
Toronto, ON
M7A 1N3

Emailed to Katerina.Downard@ontario.ca and uploaded to the Environmental Registry of Ontario

Dear Katerina Downard,

RE: Environmental Registry of Ontario 019-7709 Southwestern Ontario Transportation Planning Study – Early Findings

The Ontario Federation of Agriculture (OFA) welcomes the opportunity to provide comments from an agricultural perspective on the Southwestern Ontario Transportation Planning Study (the SW Study). OFA is Ontario'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.

A safe and efficient transportation system is critical to Ontario's interconnected agri-food system, helping to ensure our quality of life and financial contributions to local and provincial economies.

The objectives of the SW Study are based on *Connecting the Southwest: A Draft Transportation Plan*. In our March 2020 submission on ERO 019-1097 *Connecting the Southwest*, we highlighted unique transportation needs in the region related to the agricultural sector.

The Southwestern Ontario region has over 2.3 million hectares of agricultural land and a growing agricultural sector that represents over 50% of Ontario's farm income. It also has an agri-food sector that employs about 119,000 people across the region. We recommend the objectives of the SW Study include specific consideration of the agri-food sector.

Each year, Canadians export almost \$US 200 billion in agricultural production and processed food and beverages; annual imports are about \$US 135 billion¹. Extreme weather events and climate uncertainty highlight the need for Ontario to continue to be seen as a stable source of high quality agricultural and agri-food products. Delays transporting livestock and harvested crops to markets risks the quality, safety and security of our food systems and the health of our livestock.

¹ World Integrated Trade Solution; United Nations Statistical Division, World Bank, and the World Trade Organization <https://wits.worldbank.org/CountryProfile/en/Country/CAN/Year/2021/TradeFlow/EXPIMP/Partner/all/Product/Total>

As with most regions of the province, the volume and mix of transportation on peak summer routes to rural destinations is of concern to our members. For example, reserving ferry space at is critical to the movement of farm equipment and production, which coincides with rising numbers of recreational travellers. Higher seasonal traffic volumes also overlap the time farmers are moving equipment and production on our rural road systems.

We recommend the Ministry of Transportation work to ensure sufficient ferry capacity is in place to accommodate the movement of agricultural inputs, equipment and production for farm businesses on Pelee Island in Lake Erie, Manitoulin Island in Lake Huron, as well as Wolfe, Amherst and Howe Islands in eastern Lake Ontario. While these islands are predominantly farm communities, ferry services need to be able to accommodate seasonal recreational and tourist traffic while ensuring farm production and support services move freely during critical planting, development and harvest windows.

In addition, population growth projections for the Windsor, London, and Sarnia areas will further impact the ability of farm operators to travel local highways safely and efficiently. We are pleased that the SW Study highlights the need to minimize the number of collisions, accidents, and injuries. We recommend local and provincial road design departments undertake highway safety audits to ensure infrastructure is constructed so as to ensure large slow-moving farm equipment can safely travel between farm fields.

For example, the SW Study recognizes 1,800 km of cycling routes. Ensuring the cycling routes are designed to be compatible with, and avoid impeding farm equipment, would help reduce the build up of vehicles behind farm equipment and reduce the potential for drivers to pass dangerously.

We rely on an efficient transportation system capable of competitively delivering farm production between rural farm communities, and across the Windsor to Montreal corridor for domestic and export markets. We are pleased that the SW Study identifies reducing delays for goods movement as a key goal. We rely on local roads to move farm products and machinery, and deliver strong economic benefits. Highway safety audits in rural farm regions should also consider bridge and underpass design, installation, and maintenance.

Our rural regions, and specifically Southwestern Ontario have a vast infrastructure of underfunded rural roads and bridges. For example, the lower tier municipality of Centre Wellington has 98 bridges, and twenty per cent are either closed or have load or height restrictions, and a backlog of \$28,000,000 in unfounded liabilities with regard to bridge management. Kent county, with more bridges than any other county in the province, is in a similar situation.

Bridge closures affect everyone in the community. Farmers need to travel farther to their fields, and to transport inputs and production. Local residents have to drive farther to work and to shop, have longer wait times for first responders, longer bus rides for students, and greater fuel usage.

The funding mechanism for municipalities is not sufficient to improve the state of rural bridge infrastructure without provincial assistance. The SW Study has five goals with measures to address each goal. We recommend adding measures needed to fund the maintenance and replacement of rural roads and bridges that are critical for a functional, prosperous and livable rural community.

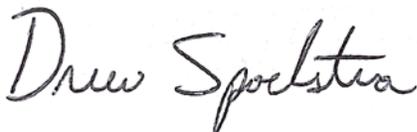
While Ontario's regional transportation plans aim to foster quality of life, prosperity and safety, plans should insure that bridges are present, right sized, safe, remain open for use, and are built with a reasonable cost structure. We recommend the Province of Ontario develop a funding formula for rural municipalities to effectively address the need to maintain their roads and bridges, review the mandatory engineering requirements for bridges, and consider the suitability of pre-engineered corrugated steel culverts in place of expensive concrete bridges on rural roads. We recommend the Ministry analyse the added delays and costs incurred in regions caused by improperly maintained roads and bridges, to inform appropriate measures to achieve these goals.

Rural communities have very few transportation options to meet their needs. As transportation volumes increase, SW Ontario rural residents and workers will need a range of transportation services, with minimal wait times, and suitable system transfer choices.

The impacts of extreme weather events have and will continue to increase, including flooding and hazardous winter travel conditions. As transportation infrastructure design adapts to better address impacts of extreme weather events, we recommend decisionmakers consider undertaking Agricultural Impact Assessments (AIA). AIA evaluate the potential impacts of non-agricultural development on agricultural operations and the Agricultural System, and recommend ways to avoid, minimize and mitigate adverse impacts.

OFA supports the approach of the Ministry of Transportation, in working to incorporate the findings of the Southwestern Ontario Transportation Task Force, in the SW Study. We look forward to further discussion with the Ministry, to ensure the primary industry in Southwest Ontario, the production and marketing of agri-foods, is reflected in the transportation framework for the region.

Sincerely,



Drew Spoelstra
President

cc: Hon. Prabmeet Sarkaria, Ontario Minister of Transportation
Hon. Lisa Thompson, Minister, Ontario Ministry of Agriculture, Food and Rural Affairs
OFA Board of Directors