



LONG-TERM THINKING FOR TODAY'S ISSUES

August 5, 2022

Attention: Katerina Downard
Environmental Policy Office
Ontario Ministry of Transportation
777 Bay St, 7th Floor, Suite 700
Toronto, ON M7A 2J8
Via email: Katerina.Downard@ontario.ca

Re: ERO 019-5259 Connecting the East: A Draft Transportation Plan for Eastern Ontario

Dear Ministry,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

“Connecting the East: A Draft Transportation Plan for Eastern Ontario” acknowledges the importance of agriculture within this region of the province. Farm businesses rely on transportation infrastructure to provide access to farming inputs, allow movement of farm equipment between fields throughout the year, and to get goods to market. As rural residents, farm families are also impacted by transportation infrastructure and access to public transportation. In this region the transportation system is vital for connecting rural residents with medical care and essential supplies. The transportation system also needs to allow city dwellers access to agri-tourism in rural communities.

The CFFO recommends:

- Moving forward with the outlined projects to maintain and widen existing highways and bridges.
- Moving forward with the outlined projects to improve and add rest stations along key routes.
- Ensuring efficient use of the current infrastructure.
- Requiring Agricultural Impact Assessments for new transportation infrastructure proposals.
- Increasing local processing capacity to increase long-term economic opportunity in the region.
- Reducing red tape to allow farm businesses to more easily connect with customers.
- Ensuring no cost to farmers for ongoing safe access to fields in the event of upgrades to rail crossings.
- Ensuring a minimum of disruption and cost to private land owners and farm businesses from public trails.

- Ensuring safety for all vehicles on the road through design and maintenance that accounts for large slow-moving farm equipment.
- Increasing road safety to prevent accidents and promptly investigating and clearing accidents to re-open vital routes.
- Ensuring reliable high-speed internet and cellular service are available in all rural areas.
- Planning for increased passenger rail service, including high-speed rail.

Connecting People and Places

Currently highway and bus travel are the most affordable options for most people. Highways need to be constantly maintained and improved. **The CFFO supports the proposed highway related projects discussed in the draft transportation plan, including widening of key sections along 417, 17, 401, and 35 and doubling the Norris Whitney Bridge in Prince Edward County, which will all benefit the region.**

Policy for transportation needs to look beyond mere infrastructure and consider how land use policies and other types of policies can shape demand for transportation in the first place. Building new transportation infrastructure is costly, and often comes with significant loss of valuable farmland and natural areas. **The CFFO strongly encourages policy and planning that will ensure efficient use of the current infrastructure.**

Ontarians want government policy that will make better use of our existing roads, railways and other transportation infrastructure. There are many ways to make better use of our existing highway infrastructure, including increasing the use of managed lanes for more efficiently moving both goods and people through key corridors, finding ways to reduce peak demand and more evenly distribute demand throughout the day, and making better use of alternatives such as rail for both goods and passengers. Perhaps most important of all, however, is to reduce demand altogether.

The pandemic has illustrated that there is an enormous opportunity for changing the need for travel on a regular basis, particularly for those commuting into the major centres for work that can be done from home. Any plans for new major infrastructure projects need to consider how traffic demands are being impacted by the changing work environment.

If new projects do move ahead, **the CFFO recommends requiring Agricultural Impact Assessments as part of any proposal for new transportation infrastructure impacting farmland or the agri-food network.**

Supporting a Competitive and Open for Business Environment

Transportation is vital for getting goods to markets. This region is also an important route for goods moving east and west across the country and for tourism.

The CFFO supports government efforts to improve and add rest stations along key routes (action 20). It is important to consider the need for rest stops to include adequate washroom facilities for truckers and tourists traveling along major routes. There need to be appropriate rest stops for animals being transported long distances through this region as well.

Economic opportunities need to be considered alongside the transportation system itself. Although short term construction jobs and the resulting transportation infrastructure improvements will benefit the region, it is important to consider longer-term economic opportunities.

Direct agricultural production requires further processing within reasonable distances, including abattoirs for all species raised in the region, as well as processing for milk and other perishable products. The time for travel of live animals and perishable goods depend on things like size of highways, road conditions, border closures and so on. **Increasing local processing capacity would offer long-term economic opportunity in the region.**

Tourism is important for local businesses, including many farm businesses who focus on agri-tourism or serving local markets. It should be easier for farms to create alternate entrances to their property that connect directly with tourist routes such as trails. **The CFFO recommends red tape reduction to allow farm businesses to more easily connect with customers.**

Farmers need safe access across railways to ensure they can bring large slow-moving equipment in and out of fields. Action 21 highlights the importance of mitigation measures to ensure ongoing safe access to fields for farm equipment in the event of upgrades to rail crossings. **The CFFO emphasizes that farmers should not be burdened with the costs of improving or maintaining rail crossings in order to have access to their land.**

More Choice and Convenience

While trails and bicycle routes (action 36 and 37) can be beneficial for farm businesses, they can also create problems for landowners when trail-users trespass onto private property, or when fencing responsibilities come into dispute. **Government needs to ensure regulations allow the greatest benefit of tourism while also ensuring a minimum of disruption and costs to private land owners and farm businesses.**

Improving Safety and Inclusion

Safety for farm vehicles using the road is important not only to farmers, but all road users. **Design and maintenance for things like roads, traffic circles, curbs and shoulders (highlighted in action 48) need to consider safety for all vehicles on the road, including for large slow-moving farm equipment.** There should be minimum standards for maintaining sufficient shoulders, including on gravel roads, to ensure space for farm equipment operators to allow motorists to pass safely. Signage should also remind motorists to be cautious around large equipment.

There is obvious economic importance to keeping major roads open. Safety is also an important factor. If roads are closed due to accidents, this can pose extra risk for rural residents who may not be able to access major centres for emergency reasons. Safe secondary routes need to be maintained in good condition in case of road closures.

On major artery routes such as the 401, where no or few alternate routes exist, safety risks that result in accidents and road closures are a major concern. Action 55 highlights the potential for use of drone technology to assist in accident investigations, for example. **The CFFO recommends increased efforts to improve road safety and prevent accidents. When accidents do occur, greater effort needs to be made to promptly investigate and clear accidents in order to re-open these vital routes quickly.**

Preparing for the Future

One of the key goals mentioned in this section is investments in improved broadband and cellular services (action 53). Improved internet and cellular service in rural areas is an important foundation to help provide economic opportunities and access to some types of essential services. Some types of medical care, including for mental health support and other medical appointments that can be conducted by phone/video, rely on internet and cellular infrastructure. This allows essential services to come to people where they live, rather than requiring travel, which often comes with significant costs of money and time, as well as risk to safety in poor weather conditions. **The CFFO calls for reliable high-speed internet and cellular service in all rural areas.**

Former rail infrastructure that used to provide passenger and freight transit has, over the past decades, been removed, leaving trucking the main form of transit for goods into and out of rural areas. While our existing rail infrastructure can be put to much better use, expanding rail service needs to be part of long-term planning in Ontario. **Preparing for the future should include planning for increased freight and passenger rail service, including high-speed rail options.**

Conclusion

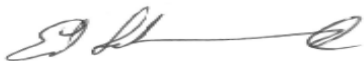
Transportation is vital for the farm businesses and farm families living and working in the eastern region of Ontario. This region acts as a key corridor connecting Toronto to Montreal and eastern Canada, making it a key transportation hub for the province.

Transportation systems including road travel, rail, boat and air travel must be maintained in order to ensure people's safety and access to necessary supplies and medical services, and to ensure the timely movement of people and of goods to market.

The CFFO recommends moving forward with the outlined projects to maintain and widen existing highways and bridges, and to improve and add rest stations along key routes. Business opportunities in this region should be promoted, including increased regional processing capacity and opportunities to connect directly with customers. Costs to private business owners, including farmers, need to be kept to a minimum from things like rail crossings and public trails. Safety is foundational in the transportation system, including accounting for large farm equipment, safe secondary routes, and prompt investigation and clearing of accidents. Reliable high-speed internet and cellular service need to be available in all rural areas. Planning for the future needs to consider how to efficiently use our current infrastructure, how to improve our rail service, and the potential impact on agriculture of any proposed new transportation infrastructure.

We appreciate your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President
Christian Farmers Federation of Ontario