



LONG-TERM THINKING FOR TODAY'S ISSUES

August 28, 2021

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

Re: ERO 019-3839 Greater Golden Horseshoe Transportation Plan Discussion Paper

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.

“Towards a Greater Golden Horseshoe Transportation Plan – Discussion Paper” does not acknowledge the importance of agriculture within this region of the province, nor the significance of transportation in this region for agriculture across the province. Farm businesses rely on transportation infrastructure in the Greater Golden Horseshoe (GGH) to access farming inputs, processing facilities and to get goods to market. In this region the transportation system is also vital for connecting rural residents with specialist medical care, as well as other key services such as education, recreation and access to travel beyond the province.

This region is also home to much of the best and most productive farmland in the province. Ongoing protection of this irreplaceable resource remains a challenge in the face of development pressure with an ever-expanding population in the region. However, careful planning and efficient use of existing resources and infrastructure can ensure the farmers who live and work on our most productive farmland can continue to provide economic and environmental benefits for this region and the province as a whole.

Access to Services

Rural areas within the GGH have significantly reduced or entirely lost access to public transit, making personal vehicles the main form of transportation for people to and from rural areas. Former rail infrastructure that used to provide freight transit has, over the past decades, been removed, leaving trucking the main form of transit for goods into and out of rural areas as well. Rural areas need access to some forms of public transit, be it bus or revived passenger rail service, both to bring rural residents into the city for necessary services, and to bring urbanites out to the country for recreation and tourism opportunities.

Keeping Goods Moving

Transportation in the GGH is vital for getting goods to markets for farm businesses both within and outside the region. Direct agricultural production requires further processing within reasonable distances, including abattoirs for all species raised in the region. There are already significant processing facilities within the GGH. The CFFO would like to see processing capacity expanded, outside of city centres, within this region of the province. There are local opportunities for import replacement, a strong local work force, and infrastructure to expand exports in this region as well.

It is important to consider the transportation of live animals to processing facilities and, where that processing capacity does not exist locally, to ensure animal welfare can be maintained for transport of animals out of the region.

The CFFO supports recommendations included in the Discussion Paper for increased managed lanes focused on transportation of goods through main corridors. These managed lanes need to consider safety of vehicles, especially smaller vehicles, entering and exiting the highway. The CFFO supports further exploration of the benefits of Off-Peak Delivery for freight transportation.

The CFFO also supports the proposal for a Strategic Goods Movement Network that would need to be considered in municipal land use planning using transportation studies. Studies of this transportation network should also consider how it relates to the overall Agri-Food Network as part of an Agricultural Impact Assessment.

Protection of Farmland

Careful planning and efficient use of existing infrastructure can protect our valuable farmland and ensure the farmers who live and work in this highly populated region can continue to grow safe healthy food, and provide economic and environmental benefits even while working close to busy centres.

Proposed highway expansion projects, including the highlighted GTA West Highway and Transit Corridor, will directly remove significant acres of farmland. Major highways such as this also increase development pressure, putting many more acres of surrounding farmland at risk.

Among the top priorities of Ontarians listed in the discussion paper is a call for government to “make better use of the roads, railways and other infrastructure we already have” (p. 15). Furthermore, Goal 2 “Relieve Congestion” on our highway system includes emphasis on the need for “Optimizing Existing Corridors” and to “Reduce the Need for Travel” as well as to “Provide Alternative Ways to Travel.”

There are many ways to make better use of our existing highway infrastructure, including many that are outlined in the discussion paper. These include 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. 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. 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 those commuting into the major centres for work that can be done from home. The CFFO recommends a pause on any new major infrastructure projects until it is clear what the impact on traffic demands will be in a post-COVID work environment.

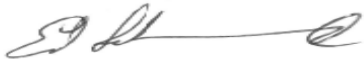
Policy for transportation needs to look beyond mere infrastructure and consider how land use policies and other types of policies can shape demand for transportation in the first place.

Conclusion

Transportation is vital for the farm businesses and farm families living and working in the GGH. This pivotal system is also significant to farmers across the province. The CFFO supports efforts to focus on the smooth and timely movement of goods through this region. The transportation system must consider rural residents' access to specialist medical care, education, recreation and travel beyond the province, as well as urbanites' access to recreational opportunities in rural areas. The CFFO recommends emphasis on better use of our existing infrastructure rather than building new highway routes in order to protect our highly productive farmland and the vitality of the farm businesses in this region.

We appreciate your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President
Christian Farmers Federation of Ontario