



LONG-TERM THINKING FOR TODAY'S ISSUES

March 17, 2020

Cheryl Davis
Team Leader
Environmental Policy Branch
Ministry of Transportation
777 Bay St.
Suite 700
Toronto, ON M7A 2J8

Delivered via email to: SWPlan@Ontario.ca; cheryl.davis@ontario.ca

RE: ERO 019-1097 Connecting the Southwest: A Draft Transportation Plan for Southwestern Ontario

Dear Cheryl Davis,

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 Southwest: A Draft Transportation Plan for Southwestern Ontario” acknowledges the importance of farming 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.

The CFFO recommends that road design and regulations on reduced load periods consider the realities of contemporary farm equipment. We also recommend agricultural representation as part of the Transportation Task Force.

Slow Moving Farm Equipment (#17 page 14)

It is important to consider farm equipment in road design in rural areas, including within small towns, where equipment may need to pass to get from field to field. Roundabouts certainly need to consider farm equipment in the design. They need to be large enough to accommodate the passage of large equipment. They also need to have the centre designed to allow a low curb for equipment to pass more smoothly. Width of roads, including parking allowances within small towns, also need to account for the width of farm equipment that may need to use these roads. Policies around the use of guardrails need to consider the impact and risks created for farm equipment such as combines.

Reduced Load Periods (#20 page 15)

Farmers recognize the importance of protecting our rural roads from damage, especially in the spring when roads are more vulnerable. At the same time, regulations intended to protect roads need to keep up to date with current farming practices and equipment.

Reduced load periods should be based on weight per axel to account for updates in contemporary equipment and the actual impact on the road. A long-term goal should be to improve more roads that can then safely handle higher loads during that spring period.

Consideration of timing of this period needs to be based on current road and weather conditions, not just dates on a calendar. Spring is an extremely busy time for farm businesses, with many time-sensitive jobs needing to be completed in often short windows of opportunity. Restrictions to protect roads need to accommodate, as far as possible, flexibility for farmers while still protecting road infrastructure.

Transportation Task Force

One of the Key Actions outlined in the “Draft Transportation Plan” is the creation of a Task Force focused on the integration and enhancement of public transit within the region. It is vital within this region to ensure the perspective of agriculture is included in the Task Force discussion, including transportation’s impact on farm businesses, on the practicalities of farm equipment movement and on farmers and their families as rural residents.

The CFFO recommends that there should be agricultural representation on the Task Force. If direct representation on the task force is not possible because it will be exclusively comprised of regional mayors and Indigenous chiefs, we recommend that part of the process include consultation with agricultural organizations, including the three general farm organizations and commodity organizations.

Summary

Transportation in this region is vital for the farm businesses and farm families living and working in the southwestern region of Ontario. This region also connects Ontario, through rail, highways and ports, to the US and other markets outside the province, making it a key transportation hub for the whole province.

We recommend careful consideration of farm equipment needs both for road design and for regulations on reduced load periods. We also recommend that agriculture be given representation or, at minimum advisory opportunities, for the Transportation Task Force.

Thank you for your consideration of our input.

Sincerely,



Clarence Nywening, President
Christian Farmers Federation of Ontario

cc.

Hon. Ernie Hardeman, MPP, Minister of Agriculture, Food and Rural Affairs