



October 1st, 2020

The Honourable Caroline Mulroney
Minister of Transportation
777 Bay Street, 5th Floor
Toronto, ON
M7A 1Z8

RE: Highway 413 Project

Dear Minister Mulroney,

Ontario Farmland Trust (OFT) is a not-for-profit organization whose mission is to protect and preserve Ontario farmlands and associated agricultural, natural, and cultural features of the countryside. We protect farmland in order to ensure a safe and sustainable food supply for future generations of Ontarians. OFT achieves this through direct land securement, stewardship, policy research, and education.

Farmland, a non-renewable and finite resource, is the foundation of Ontario's largest economic sector, the agri-food industry. The agri-food sector in Ontario employs more than 820,000 Ontarians along the supply chain, and annually contributes over \$39 billion to the province's GDP¹. About half of the entire country's Class 1 soil is found in Ontario², and 42% of this Class 1 soil is located within the Greater Golden Horseshoe (GGH). This agricultural soil makes up about half of the total land area of the GGH, and the regional agri-food sector provides 38,000 jobs and an annual contribution of \$11 billion to Ontario's economy³. Additionally, the GGH is also home to specialty crop areas with microclimates that make it possible for them to produce crops that cannot be grown elsewhere. As such, it is crucial to the long-term viability of Ontario's agri-food sector that the fertile farmland of the GGH is protected from non-agricultural development.

Recently, through changes to provincial plans such as the *Provincial Policy Statement (PPS)*, and the proposed "Amendment 1" to the *Growth Plan for the Greater Golden Horseshoe*, the Province has shown a significantly expanded emphasis on the Agricultural System, which OFT would like to commend. The Agricultural System helps to protect the finite amount of prime agricultural land in the province by preventing this land base from fragmentation as a result of non-agricultural development. OFT recognizes the Province's ongoing commitment to Ontario's agricultural sector, and appreciates the efforts that have been made to protect farmland through the expansion of the Agricultural System.

The GGH is the most populated and fastest-growing region in Canada³, and while OFT acknowledges the transportation needs of this growing population, we would also like to stress the important role that farmland in the GGH will play in supporting this growing population long-term.



OFT is concerned about the negative impacts that the proposed Highway 413 will have on farmland in the GGH. The proposed Highway 413 poses a major threat to farmland in the GGH, and thus the viability of the region's agri-food sector. This highway will result in the loss of thousands of acres of prime agricultural land, including over 1000 acres of protected farmland in the Greenbelt. The protections provided by the Greenbelt have helped preserve the regional agricultural system by preventing fragmentation of the agricultural land base that results from non-agricultural development on farmland.

The Province's decision to proceed with a project that will result in such farmland loss and fragmentation of the agricultural land base in the GGH contradicts the dedication to the agricultural system that the Province has previously shown.

In addition to the thousands of acres of farmland that would be directly lost due to the proposed Highway 413, the construction of this highway would also increase development pressure on the adjacent lands, indirectly leading to the loss of thousands more acres of farmland. Transportation corridors facilitate urban sprawl by increasing the commutable distance to employment centres, thus increasing development pressures in new areas. The expansion of the road network in this way shows a commitment to a commuter lifestyle that is becoming outdated. Additionally, there is no evidence that this corridor would relieve congestion on other transportation routes, and previous MTO studies have only estimated a time savings of 30 to 60 seconds for commuters⁴. On the contrary, there is evidence that the construction of a new highway will only serve to increase the number of cars on the road⁵.

The construction of Highway 413 will result in the loss of thousands of acres of prime agricultural land and will facilitate non-agricultural development on farmland in the future, resulting in fragmentation of the agricultural land base within the GGH.

The global COVID-19 pandemic has reinforced the importance of local food sources and a strong food supply chain. Even though many grocery stores saw empty shelves at the beginning of the pandemic, Ontario's agri-food sector proved itself to be resilient and durable. OFT believes that the only way for Ontario's agricultural industry to remain secure is to protect the agricultural land base. This way, future generations of Ontarians will always be able to rely on the province's ability to produce Ontario-grown food, no matter the circumstances in the future.

Rather than continuing with the construction of Highway 413, OFT suggests that the Province explores alternative ways of reducing congestion that would not result in thousands of acres of prime agricultural land being lost.

OFT believes that the proposed Highway 413 project will put farmland in the GGH at an unacceptable level of risk, and that alternatives to the project should be thoroughly explored by the Province instead. The long-term benefits of preserving farmland far outweigh the benefits of the proposed Highway 413.



Thank you for the opportunity to share our feedback on the proposed Highway 413. We invite discussion and welcome any questions you might have. We look forward to continuing to work with the Province to strengthen the Agricultural System and to protect the viability of Ontario's agricultural sector.

Most Sincerely,

Kathryn Enders,
Executive Director, Ontario Farmland Trust
kathryn@ontariofarmlandtrust.ca



Cc:

The Honourable Doug Ford, Premier of Ontario
The Honourable Marie-Claude Bibeau, Minister of Agriculture and Agri-Food
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
The Honourable Steve Clark, Minister of Municipal Affairs and Housing
The Honourable Jeff Yurek, Minister of Environment, Conservation and Parks
The Honourable Laurie Scott, Minister of Infrastructure
David Crombie, Greenbelt Council
Mary Delaney, Land Over Landings
Anne Bell, Ontario Nature
Tim Gray, Environmental Defence
Sarah Bakker, National Farmers Union – Ontario
Keith Currie, Ontario Federation of Agriculture
Suzanne Armstrong, Christian Farmers Federation of Ontario

References:

- [1] Ontario Federation of Agriculture. 2018. Agriculture Matters – A Guide for Municipal Councillors and Staff. <https://ofa.on.ca/resources/guide-for-municipal-councillors-and-staff/>
- [2] Environment Canada. 1976. Canada Land Inventory: Land Capability for Agriculture. [https://atrium.lib.uoguelph.ca/xmlui/bitstream/handle/10214/15222/LUPSD_land_capability_agric_rep10_1976.pdf?sequence=1&isAllowed=y#:~:text=6.,Class%201%20to%203%20soils\).](https://atrium.lib.uoguelph.ca/xmlui/bitstream/handle/10214/15222/LUPSD_land_capability_agric_rep10_1976.pdf?sequence=1&isAllowed=y#:~:text=6.,Class%201%20to%203%20soils).)
- [3] Ontario Federation of Agriculture. 2015. Farmland at Risk: How Better Land Use Planning Could Help Ensure a Healthy Future for Agriculture in the Greater Golden Horseshoe. <https://ofa.on.ca/wp-content/uploads/2018/01/Farmland-at-risk-How-better-land-use-planning-could-help-ensure-a-healthy-future-for-agriculture-in-the-Greater-Golden-Horseshoe.pdf>
- [4] Ontario Ministry of Transportation. 2017. GTA West Corridor Advisory Panel Report. <https://web.archive.org/web/20180213165539/http://www.mto.gov.on.ca/english/publications/gta-west-report/index.shtml>
- [5] Hills, P.J. 1996. What is induced traffic?. *Transportation* **23**, 5–16
<https://doi.org/10.1007/BF00166216>