



MUNICIPALITY OF
West Perth

Perth County



ONTARIO CANADA
ST. MARYS

Ministry of Transportation
c/o Environmental Registry Ontario
659 Exeter Road
London, Ontario
N6E 1L3

February 25, 2020

RE: Response to the Ministry of Transportation's Request for Input on the *Connecting the Southwest: a draft transportation plan for southwestern Ontario*

To Whom It May Concern,

Below is a comprehensive report containing input on the "*Connecting the Southwest: a draft transportation plan for southwestern Ontario*" from the Perth County region. This document represents the collective input of Perth County, its four member municipalities (North Perth, Perth South, Perth East and West Perth) as well as The Town of St. Marys.

Our region has already demonstrated a significant need for transportation with two successful applications to the Community Transportation Grant Program (CTGP). Our municipalities are partnering for two CTGP long-distance transportation projects: the Perth Intra-County Community Transportation Service, and the Stratford Intercity Community Transportation Service.

Perth County and its member municipalities, and the Town of St. Marys welcome the draft transportation plan. Southwestern Ontario is an important region to the Provincial economy. Transportation connectivity in this region, in particular in rural southwestern Ontario, is critical to the continued vibrancy and economic prosperity of the province.

General Comments:

1. We request a confirmation by the Ministry of Transportation (MTO) to the Ontario Highway Transport Board (OHTB) that CTGP projects by definition satisfy the 'necessity and convenience' criteria for granting a Public Vehicle (PV) license, pursuant to Order-in-Council 791-2018, and that the OHTB should expedite the issuance of PV licenses to CTGP recipient municipalities or their transportation service providers. This would remove a significant red tape barrier to the implementation of these projects.
2. We recommend that the Minister of Transportation consider creating a high-level working group within the MTO with representation from the Minister's Office, the Planning Branch, and the Strategic Transit Investments Office that would be charged with making recommendations to the Minister to facilitate the success, coordination, and extension into the future of Community Transportation Grant Program projects in Southwestern Ontario, including but not limited to:



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- a. Sustainability grants to CTGP pilot projects to ensure their continuation after March 2023;
 - b. Grants for the adoption of technologies throughout the region to facilitate seamless regional travel throughout Southwest Ontario, such as 'one-window access' where the public can obtain schedule and route information, plan a regional trip, make reservations, and pay fares;
 - c. Promoting a common regional branding across southwestern Ontario CTGP services to market the single point of access;
 - d. Facilitating access to Ontario Gas Tax funding for CTGP pilot projects to support their sustainability;
 - e. Developing strategies and supporting CTGP policies and programs to help small communities develop local 'first-mile' and 'last-mile' services to feed passengers to and from intercity and intra-county long-distance services;
 - f. Addressing last mile issues in rural Southern Ontario with meaningful solutions.
3. The Ministry of Transportation should nominate a 'lead agency' among existing Southwest Ontario CTGP Grant recipients, and fund that agency to coordinate a seamless regional transportation service. This could be modelled after the successful EasyRide program¹, developed in Perth County, under which a central agency coordinates and provides access to services and advanced technology for small municipal mobility bus services and the people they serve, including a call centre, trip booking, scheduling and dispatching, and fare payment. Perth County would be willing to host such a 'lead agency', drawing on our experience with the EasyRide model, provided the Province were to make consistent and sustainable financial support available for such an initiative.
 4. The province needs to maintain a significant role for the planning of regional transportation to ensure that the services are seamless and coordinated across regional boundaries. The current process where Counties or Regions are tasked with running pilot projects suffers from a lack of integration for routes and service types.
 5. Municipalities in Perth County have dealt with a number of traffic accidents that may be linked to routing of users by GPS programs to roads that are not intended for the level of service and increased traffic counts that they are receiving as a result. In many cases the GPS unit algorithms are automatically set to shortest route and this can lead to traffic travelling through our communities on roads that are not meant for a long distance commute level of service. There have been several tragedies that appear to be related to travel through our communities where the traffic has been routed to unfamiliar roads that are designed for a lower level of service. The GPS algorithms should take into account the level of service of the road and only route to these lower service roads for pass through traffic in cases where there are road closures etc. As local or regional municipalities we do not have leverage with the GPS providers to discuss such change but we feel the Province could assist.
 6. Relating to Goal 2, Action 20 in the report: Municipalities are very concerned about any loosening of reduced load periods due to the potential impact on our critical local road

¹ <http://www.onecaresupport.ca/services/active-in-your-community/transportation/>



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infrastructure. With the changing climate, we experience larger swings in weather conditions and shifts from what were the traditional spring reduced loading periods. Municipalities require additional tools to work with the MTO to balance the need for movement of heavy loads while still protecting critical road infrastructure during vulnerable periods.

7. The MTO should provide funding to municipalities if they are considering permitting heavy loads during reduced load periods as the longevity of local infrastructure will be compromised.
8. The Province needs to examine a methodology to upgrade former Provincial highways that are now owned by several road authorities. An example of this is Highway 86, which has become an important economic route for both employees and trade that may require significant upgrades (i.e.: widening, passing lanes, and upgrades to four lanes). It is impossible and inefficient to have local road authorities agree on timing, costs, upgrades, and other necessary matters. Between Lake Huron and Waterloo Region former highway 86 is owned by 5 different road authorities and has traffic counts exceeding that of many provincial highways.
9. The lack of public transportation makes the cost of living in rural southwestern Ontario higher than in surrounding urban areas such as Waterloo Region. This continues to have a significant impact on the regional labour market. Perth County has maintained a consistently low unemployment rate making it difficult for our innovative businesses to grow. In addition, this impedes labour mobility and excludes new Canadians and others who many not have the ability afford their own vehicle or hold a valid driver's license from accessing the employment opportunities in our region.
10. With a saturated labour market and competitive housing market in the Greater Toronto Area (GTA) greater transportation connectivity would alleviate the pressure on that market and increase labour market capacity spurring the development of badly needed attainable housing in rural Ontario. The Province needs to take greater action on providing funding and tools for municipalities to encourage the development of diverse and attainably priced housing solutions and public transit options in rural municipalities.
11. Rural municipalities offer a different quality of life than that of our urban counterparts. The ability for residents and visitors to explore the region through trails as a tourism asset, but also as active transportation is an additional means to augment traditional transportation options. Supporting larger trail routes such as the Guelph to Goderich (G2G) trail as well as providing funding to municipalities to ease the costs of implementation for on-road cycling routes would further diversify the transportation options in our region.
12. The Provincial government needs to support additional rail service, including the continued expansion of GO transit to the southwest region.