ENVIRONMENTAL IMPACT ASSESSMENT

Impacts on the Frontenac Arch Biosphere Reserve

The Frontenac Neck: An Unmitigable Crossing

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CENTRAL FINDING

The Frontenac Arch Biosphere Reserve's northern boundary lies well south of ALTO's northern corridor study area. Only the southern corridor crosses the designated UNESCO Biosphere Reserve, and it does so at the Frontenac Neck, the Reserve's most geographically constrained point. There is no technically credible mitigation strategy capable of restoring Algonquin-to-Adirondacks corridor function through the Frontenac Neck once HSR infrastructure is built. The constraint is not engineering but geography: the bottleneck is the landscape itself.

Section 1 — The Frontenac Arch Biosphere Reserve: Ecological Profile

1.1 Geological and Ecological Context

The Frontenac Arch is an ancient granite ridge, over one billion years old, connecting the Canadian Shield to the Adirondack Mountains via the Thousand Islands. It is the last intact forest corridor in eastern North America, where five forest regions converge: Boreal, Great Lakes–St. Lawrence, Carolinian, Atlantic Coast, and Appalachian. The Haudenosaunee call it the 'backbone of the mother', the structural spine sustaining living systems across the region.

The Cataraqui Trail's km 42–68.5 section traverses the geographic expression of this geological feature at its most constricted: the Frontenac Neck. From Chaffey's Lock to Eel Bay on Sydenham Lake, the trail traverses the neck of the Canadian Shield known as the Frontenac Axis, linking the vast Shield country to the north with its smaller but most impressive southern extremity, the Adirondack region. The corridor narrows here because Sydenham Lake, Opinicon Lake, and the Rideau Canal system constrain available land to a thin strip of Shield terrain, precisely where wildlife movement between north and south must concentrate.

1.2 Designation and Governance

The Frontenac Arch Biosphere Reserve was designated by UNESCO under the Man and the Biosphere (MAB) Programme in 2002 and re-designated in 2022 following a community-led nomination. It is one of 19 UNESCO Biosphere Regions in Canada, administered by the Frontenac Arch Biosphere Network (FABN) with over 100 regional partners. Its total area is 220,973 hectares: a core area of 5,073 hectares, buffer zones of 15,900 hectares, and transition areas of approximately

200,000 hectares. Canada's MAB obligations require protection of three core functions: conservation of biological and cultural diversity; ecologically sustainable development; and logistical support for research, monitoring, education, and knowledge exchange.

The FABR's northern boundary lies well south of ALTO's northern corridor study area. The northern corridor does not intersect the designated Biosphere Reserve. Only the southern corridor does, and it enters the FABR at its most ecologically sensitive point.

1.3 The Cataraqui Trail as an Existing Ecological Corridor

Before assessing impacts, it is essential to recognise what the Cataraqui Trail currently represents ecologically. The former CN Railway right-of-way, with its low-disturbance gravel surface, absence of motorised traffic, and associated hedgerows, wetland margins, and rock cuts, functions as a permeable linear movement corridor through the Biosphere. Field observers on the Frontenac Neck section routinely encounter Grey Ratsnakes on the warm rock cuts, Blanding's Turtles crossing between wetlands, and Eastern Whip-poor-wills calling from adjacent barrens. Converting this permeable corridor to a fenced, electrified, 300 km/h HSR corridor would not just add a new barrier: it would destroy an existing ecological asset and replace it with one of the most impermeable barriers that could be introduced into the Biosphere.

1.4 Key Biodiversity Areas Within the Biosphere

Three Key Biodiversity Areas (KBAs) are formally identified within the Frontenac Arch Biosphere Region. The Thousand Islands KBA (2025) contains almost the entire Canadian population of Deerberry, over 10% of Canada's Pugnose Shiner, and critical habitat for Grey Ratsnake and Blanding's Turtle. Charleston Lake KBA supports rare fire barren communities, Bear Oak, and high concentrations of Blanding's Turtle. The Frontenac Forests KBA encompasses the upland forest complexes of Frontenac County, including Frontenac Provincial Park and the Queen's University Biological Station; the Cataraqui Trail's Frontenac Neck section runs through the linkage zone connecting these two nationally significant areas. A fourth KBA, the Napanee Limestone Plain, is in the process of being proposed.

1.5 Species at Risk Profile

The Frontenac Arch Biosphere supports more than 50 threatened and endangered species. The following are most directly relevant to the Cataraqui Trail corridor:

- Grey Ratsnake (Frontenac Axis population) — Threatened under SARA. The Frontenac Neck runs through the core of the Frontenac Axis population's range. SARA critical habitat is designated and mapped throughout this zone; the habitat regulation protects all occurrence sites and a 1,000-metre buffer. Warm rock cuts, embankments, and forest edges are precisely the microhabitat features the SARA regulation is designed to protect.
- Blanding's Turtle — Threatened under SARA. The dense wetland network of the Frontenac Neck (km 42–68.5) is prime Blanding's Turtle habitat. Adult mortality rates need only increase by a small number of individuals per year to push local populations below viability thresholds.
- Wood Turtle — Endangered under SARA. Present in the Salmon and Napanee watershed headwaters draining the Frontenac Neck and Napanee Plain sections.
- Cerulean Warbler — Nationally Endangered. Requires mature deciduous forest interior; HSR fragmentation would reduce interior forest area and increase edge effects.
- Eastern Whip-poor-will — Threatened. Rocky open woodland and granite barrens along the Frontenac Neck are primary breeding habitat.
- Juniper Sedge — Globally rare and Endangered. The Salmon River Alvar within the Biosphere hosts what may be the world's largest population.
- Brook Floater — Endangered. Sensitive to turbidity, chloride loading, and altered thermal regimes. Dependent on karst spring discharge in the Napanee system.

Section 2 — The Algonquin-to-Adirondacks Corridor and the Frontenac Neck

The Frontenac Arch is the ecological heart of the Algonquin-to-Adirondacks (A2A) corridor, a continental linkage of approximately 400 kilometres from Algonquin Provincial Park to Adirondack Park in New York State. The A2A Collaborative, with over 50 partner organisations, describes the corridor as one of the last remaining large-scale, intact forest and wetland linkages in eastern North America.

The A2A corridor narrows dramatically as it descends from the broad Shield plateau toward the St. Lawrence River. The Nature Conservancy of Canada's Program Director for Eastern Ontario has identified the area between Kingston, Brockville, and Westport as the connection point — the narrow pinch-point in the entire corridor. The Cataraqui Trail's Frontenac Neck section (km 42–68.5) runs along the axis of exactly this pinch-point. The A2A Collaborative's research documents over 20,000 animals killed on roads within the region annually. An HSR corridor on the Cataraqui Trail alignment would introduce a sealed, fenced barrier directly through the movement bottleneck where that mortality is already concentrated, at the one location in the Frontenac Arch where no alternative movement path exists.

KEY FINDING: THE FABR BOUNDARY AND THE UNMITIGABLE CROSSING

The FABR's northern boundary lies well south of ALTO's northern corridor study area. The northern corridor does not cross the UNESCO-designated Biosphere Reserve. The southern corridor must cross the Frontenac Arch Biosphere Reserve, and it must do so at the Biosphere's most geographically constrained point: the Frontenac Neck. Sydenham Lake, Opinicon Lake, and the Rideau Canal eliminate all alternative geometries. Mitigation does not resolve this constraint. Wildlife crossing structures can reduce road mortality in settings where animals have approach habitat and bypass movement options on either side of a barrier. The Frontenac Neck provides neither. There is no terrain on either flank that redirects movement around the barrier. Installing crossings within a sealed, fenced, electrified right-of-way through the Frontenac Neck does not reconstitute A2A connectivity, it inserts a biological impasse at the one location where the entire continental corridor must pass.

Section 3 — Impact Assessment: Three Zones

3.1 Zone 1 — Limestone and Sandstone Farmland (km 0–42, Smiths Falls to Chaffeys Lock)

The trail's western section passes through flat farmland and mixed woodland on limestone and sandstone. Key impacts in this zone include heritage and jurisdictional constraints. The trail crosses the Rideau Canal on the 1912 CN heritage railway bridge at Chaffeys Lock (km 42), a federally recognised heritage structure within the Rideau Canal UNESCO World Heritage Site corridor. HSR operating loads at 300 km/h would require replacement or fundamental reconstruction of this structure. Any modification must satisfy Parks Canada's obligations under the Canada National Parks Act, the Heritage Railway Stations Protection Act, and potentially the UNESCO World Heritage Committee if Outstanding Universal Value is affected. The 78.2 km section from Smiths Falls to Harrowsmith is part of the Trans Canada Trail; conversion to HSR would permanently eliminate this designation across Leeds and Grenville, Frontenac, and Lennox & Addington Counties.

3.2 Zone 2 — The Frontenac Neck (km 42–68.5, Chaffeys Lock to Eel Bay)

This is the most ecologically critical section of the entire assessment. The 26.5 km Frontenac Neck traverses rugged Canadian Shield: rocky ridges and outcrops of pink granite and grey gneiss, plentiful lakes and swamps, and extraordinary wetland density. Cell phone service is unreliable or non-existent through this section, a practical indicator of its remoteness and intactness. No settlements of significance exist between Chaffeys Lock and Perth Road Village. This section sits entirely within the Frontenac Arch Biosphere Reserve.

3.2.1 A2A Corridor Severance at the Bottleneck

An HSR corridor through the Frontenac Neck would introduce a sealed, fenced barrier through the geographic bottleneck of the A2A system within the Biosphere. Sydenham Lake to the south, the Rideau Canal system to the north, and granite ridges to the east and west create a landscape where wildlife movement is already channelled through a narrow strip of Shield terrain. The HSR right-of-way would seal this channel entirely, with no functional bypass available for any species requiring north-south movement through the Arch. This is the precise area that FABN's Ecological Corridors Project has identified as the priority focus: the Charleston Lake to Thousand Islands linkage.

3.2.2 Wetland and Aquatic System Impacts

The Frontenac Neck contains extraordinary wetland density. HSR construction would require reconstruction of all drainage structures to HSR load and geometry specifications, altering hydrological connectivity between wetlands on either side of the embankment; raising the track bed across a profile that currently intersects wetland water tables; vegetation clearing for a total maintained corridor of approximately 60 metres (fenced track right-of-way: approximately 30 metres; plus access roads, cleared safety margins, and maintenance strips) consuming wetland edge habitat; and overhead catenary installation introducing electrical hazards to adjacent aquatic ecosystems.

3.2.3 SARA Critical Habitat — Specific Exposure

Grey Ratsnake (Frontenac Axis population) critical habitat is designated and mapped throughout the Frontenac Neck section. SARA s. 58 prohibits destruction of this critical habitat without a valid s. 73 permit. No such permit has been applied for, and no critical habitat mapping at corridor resolution has been published by ALTO HSR. Blanding's Turtle faces acute construction-phase risk: HSR construction would intersect Blanding's Turtle movement corridors at multiple points across the entire 26.5 km section. Multi-year construction activity through active habitat is functionally unavoidable, and even low rates of additional adult mortality can collapse local populations.

3.3 Zone 3 — Napanee Plain (km 68.5–103, Eel Bay to Strathcona)

From Eel Bay on Sydenham Lake, the trail descends onto the flat limestone plain of the Napanee watershed, passing through Harrowsmith, Yarker, Camden East, and Newburgh before terminating at Strathcona near Napanee. This zone presents a qualitatively distinct but still severe set of concerns.

The Cataraqui Trail's Napanee Plain section crosses active karst limestone terrain — Ordovician formations containing sinkholes, losing streams, cave conduit systems, and karst springs that sustain the baseflow of the Napanee River and supply municipal drinking water for Napanee and wellfield water for Stone Mills and surrounding rural communities. Dynamic loads from 300 km/h train passages can induce progressive sinkhole collapse within the embankment footprint and in the broader zone of karst conduit influence. De-icing chemicals enter karst groundwater through sinkholes and losing streams without attenuation, reaching springs and the municipal supply system within hours to days. Standard stormwater management systems designed for surface or fractured-rock settings are ineffective in karst.

Grey Ratsnake critical habitat extends into the Napanee Plain section. Juniper Sedge, globally rare and Endangered, has its sole Canadian population at the Salmon River Alvar, which the southern

corridor crosses. Brook Floater mussel, Endangered, is threatened by chloride loading from de-icers in spring-fed tributaries. Wood Turtle is present in Salmon River and Napanee tributary systems crossed by this section.

3.4 Loss of Trans Canada Trail and Corridor Function

The Cataraqui Trail's 78.2 km Trans Canada Trail designation between Smiths Falls and Harrowsmith reflects national significance as a multi-use corridor. The former CN Railway right-of-way has undergone ecological recovery since decommissioning: hedgerows have established, wetland margins have encroached on ballast, and the absence of high-speed motorised traffic has allowed the corridor to function as a wildlife pathway. Conversion to a fenced, electrified, 300 km/h HSR corridor would permanently and irreversibly eliminate both the recreational and ecological corridor functions of the trail.

3.5 Community Impact Without Community Benefit

The trail passes through Portland, Chaffeys Lock, Perth Road Village, Sydenham, Harrowsmith, Yarker, Camden East, Newburgh, and Strathcona. None of these communities is of a scale to warrant an HSR station, and none appears in ALTO's station planning documents. These communities would absorb the full burden of construction impact — noise, vibration, dust, access road traffic, expropriation, permanent fencing across local trails and farm laneways — without receiving any transit-oriented development benefit, reduced travel time, or economic uplift in return. Every hectare expropriated for the HSR right-of-way is transferred to a federal Crown corporation and becomes constitutionally exempt from municipal property taxation, reducing local tax revenues while demand for municipal services remains constant.

Section 4 — Why the Frontenac Neck Cannot Be Mitigated

Standard HSR mitigation practice for linear barrier effects relies on wildlife crossing structures, drift fencing, and bridge-deck connectivity. These tools can reduce road mortality in settings where the surrounding landscape permits bypass movement and where animals have sufficient approach habitat. None of these conditions obtains at the Frontenac Neck.

> **ALTO's CEO confirms on public record: total fencing, strategic crossings only**
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> On CBC Ottawa Morning on March 25, 2026, Martin Imbleau confirmed the corridor's absolute barrier character on national radio: "Nothing can cross it. If at 330 kilometres you cross a deer, it's a huge incident… overpass and underpass will have to be strategically positioned." He also acknowledged that wildlife concerns remain uncharacterised: "We need to look at and to have some sampling in dangerous species. Are there any concerns on the wildlife that we're not aware of?" Environmental field surveys were just beginning "this week."
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> This is the CEO of the Crown Corporation building this infrastructure, publicly confirming that: (a) the corridor will be an absolute barrier to wildlife movement; (b) crossings will be strategic, not continuous; and (c) the baseline ecological data needed to determine where crossings must go does not yet exist. At the Frontenac Neck, where the continental A2A wildlife corridor has no alternative path, these three facts together constitute an irreversible commitment being made without the information required to make it responsibly.
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> *Source: CBC Ottawa Morning, March 25, 2026. cbc.ca/listen/live-radio/1-100-ottawa-morning/clip/16205093*

4.1 The Geometry Prevents Bypass Movement

Wildlife crossings function because animals that cannot cross a barrier directly will eventually find a crossing structure if bypass terrain exists on either side. At the Frontenac Neck, no bypass terrain exists. Sydenham Lake and the Rideau Canal system physically bound the corridor on north and

south. Granite ridges confine it east and west. A sealed right-of-way across the strip is not a barrier that reduces connectivity, it is a barrier that eliminates it.

4.2 Crossing Structures Cannot Reconstitute a Severed Bottleneck

Wildlife crossing structures at HSR specification require long approach zones, low-disturbance buffer areas, and native vegetation to be used effectively by sensitive species. The total maintained infrastructure corridor of approximately 60 metres (fenced track right-of-way: approximately 30 metres) through the Frontenac Neck consumes most of the available dry-land corridor at each crossing point. Population viability modelling for Grey Ratsnake consistently shows that the species' low reproductive rate and high site fidelity make it acutely sensitive to adult mortality from linear barriers. Given that the Frontenac Neck already sits within a landscape where road mortality is documented as a population-level threat, any additional barrier compound effect risks exceeding population viability thresholds.

4.3 SARA Critical Habitat Cannot Be Replaced in This Terrain

Grey Ratsnake critical habitat under SARA is site-specific and irreplaceable on the timescales relevant to HSR planning. The warm rock cuts, granitic embankments, and edge habitats of the former CN railbed are the product of over a century of ecological succession. Habitat offsets cannot substitute for designated SARA critical habitat at the prescribed location. The SARA framework does not recognise habitat offsets as compliance with s. 58 prohibitions. There is no pathway under SARA to lawfully destroy this critical habitat without a valid s. 73 permit, and no s. 73 permit has been sought.

4.4 Hydrological Impacts Cannot Be Fully Remediated

The dense wetland network of the Frontenac Neck and the karst aquifer of the Napanee Plain both represent hydrological systems whose integrity depends on continuity and undisturbed subsurface drainage. Raising the track bed across the former railbed's current profile permanently alters drainage gradients across the full 26.5 km Frontenac Neck section. These alterations cannot be fully characterised in advance and cannot be reversed once construction is complete.

Section 5 — Regulatory and Policy Framework

The southern corridor engaging the Frontenac Neck triggers overlapping regulatory obligations none of which has been addressed in ALTO's public documentation:

- SARA ss. 32 and 58: Grey Ratsnake critical habitat is mapped throughout the entire 26.5 km Frontenac Neck. Any construction destroying this habitat without a valid s. 73 permit is a federal offence regardless of proponent status. Construction would also result in foreseeable mortality for Blanding's Turtle and Grey Ratsnake, engaging s. 32 prohibitions.
- UNESCO Man and the Biosphere Programme: A federal infrastructure project sealing the central axis of a UNESCO Biosphere Reserve's core wildlife corridor cannot be reconciled with Canada's MAB obligations without a formal MAB compatibility review, which ALTO has not conducted.
- Rideau Canal UNESCO World Heritage Site: The Chaffeys Lock heritage trestle crossing requires Parks Canada approval, Heritage Railway Stations Protection Act assessment, and potentially review by the UNESCO World Heritage Committee.
- Trans Canada Trail: The federal government's financial and programmatic investment in the Trans Canada Trail creates at minimum a policy obligation to demonstrate that no alternative corridor exists before an HSR alignment is authorised that would permanently destroy 78.2 km of nationally designated trail.

- Cataraqui Conservation ownership: Acquisition of the right-of-way requires expropriation from a conservation authority whose statutory mandate is explicitly to protect natural heritage lands, engaging the Conservation Authorities Act.
- Fisheries Act s. 35: Numerous lake and stream crossings, combined with the presence of SARA-listed Brook Floater in the downstream Napanee system, requires authorisation of any harmful alteration of fish habitat.

Section 6 — Critical Information Gaps

The following information, absent from ALTO's public documentation, is required for a lawful route selection decision:

- No SARA critical habitat mapping for Grey Ratsnake, Blanding's Turtle, or Wood Turtle has been incorporated into publicly available corridor assessment materials at the resolution required by SARA ss. 77–79.
- No population viability analysis for Grey Ratsnake or Blanding's Turtle has been published modelling the cumulative effect of an HSR barrier at the Frontenac Neck added to the existing road matrix.
- No assessment of the Cataraqui Trail's current ecological corridor function has been conducted; it is treated in consultation materials as a recreational facility, not a functioning wildlife movement corridor.
- No wildlife connectivity modelling addressing the Frontenac Neck bottleneck geometry and the feasibility of A2A corridor permeability through a fenced HSR right-of-way has been published.
- No Parks Canada or UNESCO World Heritage impact assessment has been published for the Chaffeys Lock trestle crossing.
- ALTO’s CEO has publicly confirmed that ecological baseline surveys were just beginning as of the final week of the consultation period. On CBC Ottawa Morning on March 25, 2026, Imbleau stated: “We need to look at and to have some sampling in dangerous species. Are there any concerns on the wildlife that we’re not aware of?” He confirmed environmental field work commenced “this week.” At the Frontenac Arch — the location where the irreversibility risk is greatest and where the species most vulnerable to corridor fragmentation are concentrated — ALTO’s CEO was still asking what wildlife concerns exist one month before the consultation closed. This is not a data gap in the supporting documentation; it is a gap in ALTO’s own operational knowledge base during the consultation period.
- No UNESCO MAB compatibility assessment has been published for the southern corridor.
- No karst hydrogeological assessment of the Napanee Plain section has been published, including dye-trace testing establishing flow connectivity to municipal water supply springs.

Section 7 — Formal Requests

1	**Commission an independent wildlife connectivity assessment** Using species-level corridor modelling for Grey Ratsnake, Blanding's Turtle, Cerulean Warbler, Eastern Whip-poor-will, and large mammals. This modelling must explicitly address the Frontenac Neck bottleneck geometry and include a formal feasibility assessment of wildlife crossing structures capable of maintaining A2A connectivity through a fenced HSR right-of-way.
2	**Publish SARA critical habitat mapping at corridor resolution** For all listed species, with legal analysis of s. 32 and s. 58 implications before corridor selection. If no credible s. 73 permit pathway exists, the alignment must be rejected.
3	**Conduct a formal UNESCO MAB compatibility assessment** Before any corridor selection decision, transmit findings to the Canadian National Commission for UNESCO and the International MAB Secretariat. This is not discretionary — it is required by Canada's MAB commitments.
4	**Conduct Parks Canada and UNESCO World Heritage impact assessment** For the Cataraqui Trail alignment's crossing of the Rideau Canal at Chaffeys Lock, including analysis of alternatives to the 1912 heritage trestle.
5	**Publish a Trans Canada Trail impact assessment** Addressing the permanent loss of 78.2 km of Trans Canada Trail designation, including analysis of alternative corridor options and the feasibility of replacement.
6	**Commission independent karst hydrogeological mapping** For the Cataraqui Trail's Napanee Plain section, including dye-trace testing establishing flow connectivity between the corridor and municipal water supply springs.
7	**Conduct population viability analysis for herpetofauna** For Grey Ratsnake (Frontenac Axis population) and Blanding's Turtle, modelling cumulative mortality under a Frontenac Neck crossing added to the existing road barrier matrix.
8	**Engage all relevant technical and community partners** Including Cataraqui Conservation, Friends of the Cataraqui Trail, FABN, A2A Collaborative, Nature Conservancy of Canada, Rideau Waterway Land Trust, Parks Canada, and the Mohawks of the Bay of Quinte.

Conclusion

The Frontenac Arch Biosphere Reserve's northern boundary lies well south of ALTO's northern corridor study area. Only the southern corridor crosses the designated UNESCO Biosphere Reserve. It does so at the Reserve's most ecologically constrained point — the Frontenac Neck — where Sydenham Lake, Opinicon Lake, and the Rideau Canal eliminate all practicable alternatives and where every species moving between Algonquin and the Adirondacks must concentrate. This is not coincidental geography; it is the reason the Frontenac Arch Biosphere Reserve was designated.

There is no technically credible mitigation strategy capable of restoring A2A corridor function through the Frontenac Neck once HSR infrastructure is installed. The bottleneck is a property of the landscape. The SARA critical habitat framework does not permit offset substitution for designated critical habitat at the prescribed location. The wetland hydrology of the Neck and the karst aquifer of the Napanee Plain cannot be fully characterised before construction and cannot be restored after it. The loss of 78.2 km of Trans Canada Trail is immediate and permanent.

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