

SUBMISSION TO PUBLIC CONSULTATION

ALTO High-Speed Rail — Southern Corridor: Impact on Minor Hockey, Community Recreation Infrastructure, and Cross-Jurisdictional Fragmentation in Rural Eastern Ontario

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CORE FINDING

Ontario’s minor hockey system has already lost 38,400 registered youth players since 2006, a 20% decline with no corresponding population decrease. Rural associations are the most financially fragile part of the system, operating on thin margins where the loss of 15–20 families can collapse an age division. The ALTO southern corridor would introduce a permanent structural barrier at a moment when the system can least afford one, across a cross-jurisdictional governance boundary that no precedent exists to resolve.

Section 1 — Why This Is a Formal Submission Concern

The southern corridor, if selected, would function as a permanently fenced, grade-separated linear barrier through Stone Mills, Rideau Lakes, and South Frontenac, none of which would receive a station or any direct service benefit. This submission examines a specific, underexamined consequence of that barrier: its potential to critically damage or destroy minor hockey infrastructure and community recreation networks in the affected townships. This is not a hypothetical risk but a well-documented pattern of institutional failure triggered by increased access barriers, a pattern that is particularly dangerous in Ontario’s minor hockey system because it is already operating at or below the financial thresholds that historically supported these associations.

CROSS-JURISDICTIONAL GOVERNANCE GAP

The southern corridor crosses the geographic boundary between two separate Hockey Canada governing bodies: the Ontario Minor Hockey Association (OMHA), which governs Stone Mills, Frontenac County, Kingston, and Napanee; and Hockey Eastern Ontario (HEO), which governs Rideau Lakes and Leeds County. Neither organization has been consulted by ALTO. The corridor could fracture cross-community hockey networks across two governing bodies simultaneously, a complication with no precedent and no established resolution pathway.

Section 2 — Minor Hockey in Ontario: Structural Context

2.1 Participation trends

Minor hockey in Ontario is in sustained decline that predates and has not recovered from COVID-19: Ontario registered 203,100 youth players in 2021–22, down from 241,500 in 2006–07. This is a decline of 38,400 players (approximately 20%) despite a stable school-age population of approximately 2.77 million. Hockey now ranks fourth among youth sports nationally, behind soccer, swimming, and basketball. In Ontario, approximately 7% of school-age children participate in registered hockey, a figure that is higher in rural communities where fewer alternatives exist.

2.2 Economics of rural minor hockey associations

Ice rental costs represent approximately 91.2% of a local association’s operating budget (OMHA, 2023). This means ice is a fixed cost while registration revenue is a variable one. Any reduction in registrations directly increases the per-player cost of ice time, creating a self-reinforcing spiral. For a small rural association with 80–150 registered players, the loss of even 15–20 families can collapse a single age division. Rural arenas face additional structural vulnerabilities: Ontario operates more than 2,700 ice rinks, the majority of which are over 50 years old. The cost of addressing a single arena closure was demonstrated in Elliot Lake in 2023, where decommissioning and remediation of a 55-year-old arena involved costs of approximately \$22 million, an amount entirely beyond the capacity of any rural township in the ALTO corridor.

Section 3 — Cross-Jurisdictional Fragmentation: OMHA and HEO

The ALTO southern corridor would create a physical barrier across the OMHA–HEO jurisdictional boundary. The OMHA governs minor hockey in all of Frontenac County and Lennox and Addington County, including: Stone Mills Minor Hockey Association (Stone Mills Recreation Centre, Tamworth); Frontenac Minor Hockey Association (Frontenac Community Arena, Sydenham); Frontenac Fury Girls Hockey Association; Napanee District Minor Hockey Association; Loyalist Township Minor Hockey Association; and Kingston Minor Hockey Association. HEO governs Rideau Lakes Township and the Westport Community Arena. Families and players currently sharing ice time across the OMHA–HEO boundary (for example, participants in the Frontenac Fury Girls Hockey Association, which draws from South Frontenac, Stone Mills, Gananoque, Napanee, and Kingston) could find that cross-body cooperation is no longer logistically sustainable. Boundary reassessments would involve two separate governing bodies with separate constitutions, regulations, and jurisdictional rules, making coordinated reassessment complex and potentially contentious. No precedent exists in Ontario for a federal infrastructure project creating a cross-OMHA/HEO barrier through an active multi-association catchment area.

Section 4 — Affected Facilities

4.1 Stone Mills Recreation Centre — Tamworth

The Stone Mills Recreation Centre (opened 1974, operated by Stone Mills Township) is the home ice facility for Stone Mills Minor Hockey Association and Stone Mills Girls Hockey Association. Its importance to the regional network extends beyond normal operations: in 2020, when the Frontenac Community Arena’s ice plant failed, the Stone Mills Recreation Centre served as the emergency backup for the entire Frontenac County OMHA system. Frontenac Minor Hockey, Stone Mills Minor Hockey, Napanee District, and Loyalist Township associations ran a joint bubble-season operation from Tamworth under OMHA approval. This single facility is the de facto regional backup for an area spanning two counties and four associations. Residents at the Stone Mills council meeting specifically

raised the risk of the southern corridor creating dead-end roads that would sever community access to the arena.

4.2 Westport Community Arena – Village of Westport

The Westport Community Arena is the primary winter sports facility for Rideau Lakes Township. The village (population approximately 600) is described as the “activity hub for surrounding townships,” with the arena central to that role. The arena’s continued existence is a product of voluntary community investment: the “Friends of the Arena” grassroots campaign raised over \$250,000 to retrofit the facility, funding LED lighting upgrades, new energy-efficient heating systems, compressor upgrades, and dehumidifier installation. This is a community-funded asset with no institutional backstop if it closes. The Westport arena falls under HEO jurisdiction, but many of the families it serves share hockey networks with OMHA-governed communities to the west and south.

4.3 Frontenac Community Arena – Sydenham

The Frontenac Community Arena is the home facility for Frontenac Minor Hockey Association and serves as home base for the Frontenac Fury Girls Hockey Association, which draws players from South Frontenac, Stone Mills, Gananoque, Napanee, and Kingston. The Fury’s multi-township, multi-association catchment area draws from both OMHA territory and HEO territory. A southern corridor disrupting travel between these communities would directly affect the viability of this regional girls’ hockey program.

Section 5 – The Institutional Failure Pathway

Rural minor hockey associations do not fail suddenly. They fail through a well-documented progressive sequence triggered by increased access barriers. Given that Ontario’s hockey system is already operating below the financial thresholds that historically supported these associations, the southern corridor represents a potential trigger for this sequence in multiple affected communities simultaneously.

Stage	Mechanism
1. Barrier created or boundary redrawn	Construction of the southern corridor creates either a direct physical barrier to arena access or triggers a mandatory boundary reassessment by OMHA and/or HEO. Some families face a materially longer journey to their association’s home arena.
2. Marginal families exit the sport	Cost and travel time are the two most-cited reasons families leave minor hockey nationally, with 58% citing financial or logistical factors. A new, permanent travel burden applies additional pressure to families already on the margin.
3. Association loses registration	For a rural association with 80–150 players, the loss of 15–20 families eliminates a complete age division. Children in that cohort have no local team, accelerating further exits.
4. Fixed costs rise per player	Ice rental (91% of association budgets) is a fixed cost. As registration falls, cost per player rises. Fee increases drive further departures in a self-reinforcing spiral.
5. Association becomes unviable	Without sufficient registrations, the association can no longer sustain operations. Volunteer boards become overloaded; costs per player become prohibitive; the association collapses or merges.
6. Arena loses anchor tenant and closes	Minor hockey associations are typically the anchor tenant for rural arenas, providing the majority of ice rental revenue. When the association fails, the arena loses its primary revenue source. Rural arena closures are almost invariably permanent: \$22 million remediation cost (Elliot Lake, 2023).

Section 6 — Formal Requests

1	<p>Formally consult the OMHA and HEO before finalising any route recommendation</p> <p>ALTO must formally consult the Ontario Minor Hockey Association and Hockey Eastern Ontario as part of the pre-route-selection process. These organizations govern the sport infrastructure most directly affected by the southern corridor. Their assessment of boundary impacts, arena viability, and cross-body coordination effects must form part of the environmental and community impact analysis.</p>
2	<p>Expand the impact assessment framework to include community recreation infrastructure</p> <p>Minor hockey arenas, community rinks, and the associations that depend on them are not captured in standard agricultural or property impact analyses. They are community infrastructure assets of equivalent importance to roads and utilities in rural areas. A dedicated Community Recreation Infrastructure component must be included in the ALTO impact assessment.</p>
3	<p>Commission a specific cross-jurisdictional sport governance impact analysis</p> <p>A specific analysis of cross-jurisdictional sport governance impacts is required for any corridor alignment that crosses the OMHA–HEO boundary. This analysis must assess: the number of players and associations affected; the feasibility of boundary reassessment under both bodies’ constitutions; and the long-term viability of cross-body programming such as the Frontenac Fury Girls Hockey Association.</p>
4	<p>Ensure no crossing serving an active community arena access route is closed without formal agreement</p> <p>Stone Mills Recreation Centre residents specifically raised the risk of dead-end roads severing arena access. Every road crossing on an established route to a community recreation facility must be identified before corridor finalisation and protected from closure without formal agreement from the affected municipality and facility operator.</p>

Key Sources

- Ontario Hockey Federation (2022). Provincial Registration Data 2021–22. (203,100 players, down from 241,500 in 2006–07; 38,400 player decline.)
- Ontario Minor Hockey Association (OMHA) (2023). Association Operations Report. (91.2% ice rental share of association budgets.)
- Ontario Recreation Facilities Association (ORFA) (2023). Arena Infrastructure Report. (Elliot Lake arena closure: ~\$22M remediation cost.)
- Active for Life / PMC/Frontiers (2023). Why Families Leave Minor Hockey. (58% cite financial or logistical factors.)
- Frontenac News (2020, September 9). Hockey seasons rescued for Frontenac Minor Hockey thanks to Stone Mills Recreation Centre. (Multi-association bubble season; Stone Mills as regional backup.)
- Business View Magazine (2022). Friends of the Arena: Village of Westport. (\$250,000+ raised for arena retrofit.)
- Hockey Eastern Ontario (HEO). About Us: Geographic Jurisdiction. HEO By-Laws, Article 3. (HEO governs Rideau Lakes, Leeds County.)
- Kingstonist / Napanee Today (2026, February). Stone Mills council motion: residents raise dead-end road concerns specific to Stone Mills Recreation Centre.
- Township of South Frontenac, Rideau Lakes, Stone Mills: unanimous council opposition motions, February 2026.