

SUBMISSION TO PUBLIC CONSULTATION

Impact of the Proposed ALTO High-Speed Rail Project on Ontario's Organized Snowmobile Trail Network and Rural Winter Tourism Economy

Submitted to the ALTO High-Speed Rail Public Consultation, April 24, 2026

Prepared by	ALTO HSR Citizens Research Initiative
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PURPOSE OF THIS SUBMISSION

This submission documents the potential impacts of the proposed ALTO HSR corridors on Ontario's organized snowmobile trail network, the rural winter tourism economy it sustains, and the consent-based landowner model on which the entire OFSC system depends. It identifies specific gaps in ALTO's published assessment materials, presents economic and network connectivity evidence, and makes formal requests for assessment actions that must be completed before route selection is finalised.

Section 1 — Why High-Speed Rail Is Uniquely Destructive to Trail Networks

1.1 Complete corridor fencing and grade separation

Unlike conventional railways or highways, which can accommodate at-grade crossings, HSR corridors must be fully fenced and grade-separated for safety at 250–300 km/h. Every point where a snowmobile trail intersects the rail alignment must either be permanently severed or accommodated by an overpass or underpass. Given the density of the OFSC trail network in Eastern Ontario, the number of required crossing structures would be substantial and the cost of providing all of them prohibitive. International practice on comparable rural HSR corridors confirms that 30–60% of crossings are permanently closed rather than upgraded.

1.2 Network connectivity dependence

The economic and recreational value of the OFSC trail system depends on connectivity, not isolated trail segments. Snowmobile trails are designed as interconnected loops enabling multi-day touring. The UCSR promotes signature touring routes that span hundreds of kilometres and depend on continuous connectivity across the territory ALTO proposes to bisect: the French Connection Loop (302 km), Upper Canada Circuit (275 km), Ottawa Valley River Loop (500 km), and Ontario East Rails and Trails Loop (267 km). Severing even a small number of trail crossings can render an entire touring loop unrideable, collapsing the tourism economy it supports across dozens of communities and businesses.

1.3 Vulnerability of the consent-based landowner model

Over 60% of OFSC trails cross private land under voluntary agreements with approximately 18,000 landowners province-wide. This consent-based system is the foundation of organized snowmobiling in Ontario — and it is uniquely vulnerable to disruption. HSR construction creates multiple pressures on landowner relationships: expropriation proceedings create stress and resentment that may cause landowners to withdraw trail permissions; property fragmentation makes remaining parcels less suitable for trail access; multi-year construction disruption (staging areas, haul roads, blasting) extends well beyond the final rail right-of-way; and the erosion of trust in government land-use decisions can spread through rural communities, causing landowners far from the rail corridor to reconsider their willingness to participate in voluntary trail agreements. Unlike farmland, which retains productive capacity after a rail line passes through adjacent property, a snowmobile trail loop that loses a single critical landowner permission may collapse entirely.

Section 2 — The Affected Trail Network: Scale and Economic Significance

The OFSC manages over 30,000 km of Prescribed Snowmobile Trails across Ontario through 181 volunteer-led member clubs, organized into 16 geographic districts. The corridors currently under study pass through the territory of OFSC Districts 1, 2, and 6 regardless of which route alignment is ultimately selected.

District	Clubs / Trail km	Key Vulnerability
District 1 — Upper Canada Snowmobile Region (UCSR)	16 clubs; ~2,626 km of assigned trails; 10,365+ trail permits annually; 609+ active volunteers	Directly in the path of the southern corridor through the Kingston–Napanee–Brockville region
District 2 — Central Eastern Area Snowmobile Region	7 clubs; 1,500+ km of groomed trails from Kawarthas through Bancroft to Mazinaw Country	Northern and hydro-line corridors pass through this territory; Bon Echo Loop directly threatened
District 6 — Snow Country Snowmobile Region	14 clubs; 2,667 km; Snow Road SC manages 470+ km connecting Districts 1, 2, and 6 with 300+ private landowner agreements	Critical north–south connector club; clubhouse (est. 1976) is a community hub and emergency shelter

The combined Districts 1, 2, and 6 represent approximately 15–18% of the provincial trail network by kilometre. Applied proportionally to OFSC’s 2022–23 Economic Impact Study (Harry Cummings and Associates, using Ontario TREIM), these districts generate an estimated \$220–270 million in direct expenditures and \$450–540 million in total annual economic activity, supporting approximately 1,400–1,700 full-time equivalent jobs and generating \$80–100 million in tax revenue across three levels of government. This economic activity falls disproportionately on small rural communities where snowmobile tourism is often the primary or sole source of winter revenue, including Westport, Sharbot Lake, Perth, Cloyne, Bancroft, Seeleys Bay, Portland, Sydenham, and Harrowsmith, none of which would receive an HSR station under any proposed alignment.

Section 3 — Southern Corridor: Specific Impacts

3.1 Major trail infrastructure at risk

The Cataraqi Trail is a 104 km multi-use rail trail running from Smiths Falls to Strathcona, crossing Leeds and Grenville, Frontenac, and Lennox and Addington counties. It passes through the UNESCO-designated Frontenac Arch Biosphere Reserve, a globally significant ecological corridor. Snowmobile clubs provide essential financial and maintenance support for this trail, which serves as a critical north–south connector in the UCSR network. The Frontenac K&P Trail (90 km, Kingston northward) intersects the Cataraqi Trail at Harrowsmith, creating a critical junction point the southern corridor would threaten. Together these trails form part of the Trans Canada Trail route through Frontenac County.

3.2 Touring loop disruption

The southern corridor’s most damaging impact would be the severance of touring loop connectivity. The UCSR’s promoted touring routes depend on continuous trail links across the Kingston–Brockville–Smiths Falls triangle. A fenced HSR corridor bisecting this territory would make it physically impossible to complete the French Connection, Upper Canada Circuit, or Ottawa Valley River Loop without lengthy and potentially impractical detours. The loss of these multi-day touring routes would disproportionately affect winter tourism businesses that depend on through-traffic from touring riders such as motels, restaurants, fuel stations, outfitters.

3.3 Provincial investment at risk

The Government of Ontario recently made a \$4.9 million investment in the OFSC trail network for the 2025–26 season, recognizing the trail system’s importance to communities and the provincial winter economy. The UCSR has simultaneously undergone a painful 21% trail network reduction, losing 689 km across its 16 clubs due to financial constraints. It would be contradictory for the federal government to fund a project that permanently destroys portions of the very recreational trail infrastructure the Province of Ontario is simultaneously investing to sustain.

Section 4 — All Corridors Have Significant Impacts

Impact Category	Southern Corridor	Highway 7 Corridor	Hydro-Line Corridor
OFSC Districts affected	District 1 (UCSR)	Districts 1 and 2	Districts 1 and 2
Clubs directly affected	4+ (L&A Ridge Runners, Rideau Ridge Riders, Elizabethtown, Athens SC)	3+ (Havelock, BEAST, West Carleton)	3+ (Mazinaw Powerline, Old Hastings Snow Riders, Snow Road SC)
Major rail-trails crossed	Cataraqi Trail, K&P Trail	Tay-Havelock, OVRT, K&P at Sharbot Lake	Hydro corridor trails, K&P Trail (North Frontenac)
Signature touring loops threatened	French Connection, Upper Canada Circuit	Ontario East Rails and Trails Loop	Bon Echo Loop
Public investment at risk	County-owned rail trails, conservation authority lands	Millions in municipal bridge and trail investment	Less public infrastructure; more Crown land and private agreements

The Highway 7 corridor would parallel and in many sections overlap with the Tay-Havelock Trail (90 km), the Ottawa Valley Recreational Trail (296 km), and the K&P Trail at the critical Sharbot Lake junction. Lanark County recently partnered with the Snow Road Snowmobile Club on a \$250,000 bridge upgrade along the Tay-Havelock Trail; this investment would be directly threatened. A hydro-line alignment would directly threaten the Mazinaw Powerline Snowmobile Club, named after the powerline corridor, maintaining approximately 400 km of trails and anchoring the Bon Echo Loop (~232 km). The Snow Road Snowmobile Club (District 6; 470+ km of trail; 300+ private landowner agreements; clubhouse established 1976 serving as a community hub and emergency shelter) would be directly threatened by any corridor passing through the North Frontenac and Lanark Highlands corridor.

Section 5 – Gaps in ALTO’s Assessment Materials

The following substantive gaps in ALTO’s published documentation have been identified. No corridor option avoids significant impacts on the organized snowmobile trail network, yet none of this has been assessed or disclosed:

- No assessment of impacts on OFSC Districts 1, 2, or 6 has been published by ALTO.
- No assessment of impacts on the Cataraqui Trail, K&P Trail, Tay-Havelock Trail, or Ottawa Valley Recreational Trail has been published.
- No engagement with the OFSC, UCSR, CEASR, or individual clubs has been documented in ALTO’s public consultation materials.
- No assessment of snowmobile-related winter tourism economic impacts has been published.
- No assessment of the consent-based landowner model and the cascading trail closure risk it faces from construction disruption has been conducted.
- No wildlife crossing or trail crossing feasibility analysis has been published for any corridor option.
- No assessment of compensation mechanisms for permanent loss of trail infrastructure and volunteer-built social capital has been published.

Section 6 — Formal Requests

1	<p>Commission and publish a snowmobile trail network impact assessment for all three corridor options</p> <p>Using OFSC district-level trail data, the OFSC's 2022–23 Economic Impact Study (TREIM-based), and consultation with Districts 1, 2, and 6, ALTO must assess and publicly disclose the trail crossings, severed connectivity, and cascading landowner relationship risks for each corridor option before route selection is finalised.</p>
2	<p>Engage the OFSC and affected district organizations formally</p> <p>The Ontario Federation of Snowmobile Clubs and the boards of Districts 1, 2, and 6 hold detailed knowledge of trail connectivity, landowner relationships, and economic significance that ALTO's assessment cannot replicate without their input. Formal consultation must be documented and publicly released as part of the consultation record.</p>
3	<p>Assess and cost trail crossing infrastructure for all corridor options</p> <p>ALTO must publish a trail crossing feasibility assessment for all three corridor options, including proposed crossing locations, design specifications adequate for grooming equipment and snowmobiles, and full lifecycle cost. It must be clearly stated whether these costs are borne by the project or by trail clubs and municipalities.</p>
4	<p>Commission an independent winter tourism economic impact assessment</p> <p>The \$450–540 million annual economic activity generated by OFSC Districts 1, 2, and 6 represents a material and uncosted community impact that must be quantified and included in the project's benefit-cost analysis before any route selection is finalised.</p>
5	<p>Address the consent-based landowner model risk explicitly</p> <p>ALTO must commission an assessment of the cascading trail closure risk arising from the consent-based landowner model. This assessment must address how ALTO will prevent construction disruption from causing landowners to withdraw trail permissions, and what compensation mechanisms exist for permanent loss of trail access.</p>

Key Sources

OFSC (2022–23). Economic Impact Study — Harry Cummings and Associates, using Ontario TREIM. Direct expenditures: \$1.48B; total economic activity: \$3B; 9,307 FTE jobs; \$538M tax revenue.

OFSC District 1 (UCSR) 2025–26 Season: 2,626 km assigned trails, 10,365+ permits, 609+ volunteers.

Lanark County / Snow Road Snowmobile Club: \$250,000 bridge upgrade partnership, Tay-Havelock Trail.

Government of Ontario: \$4.9 million investment in OFSC trail network 2025–26 season (\$3.9M new + \$1M infrastructure).

UCSR 21% trail network reduction: 689 km lost across 16 clubs.

Transport Canada. TRAN Committee Appearance Binder — Item 15: High Frequency Rail, March 7, 2023.

Ontario Federation of Agriculture and l'Union des producteurs agricoles: joint suspension call, February 27, 2026.

Canadian Federation of Agriculture: resolution, AGM February 25, 2026.

Farmtario (February 2026). Cory Kozmik, farmer: HSR threatens both farm operation and OFSC trails running through the area.