

**SUBMISSION TO PUBLIC CONSULTATION**

# The Economic Case for Protecting the Frontenac Arch Biosphere: Tourism, Conservation, and the ALTO HSR Southern Corridor

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<b>Prepared by</b>	ALTO HSR Citizens Research Initiative
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Key Figures	
<b>National GDP from protected areas (2023–24)</b>	\$10.9 billion (CPAWS, 2026)
<b>Return on investment in protected areas</b>	\$3.62 per \$1 invested
<b>Jobs supported by protected areas nationally</b>	150,000
<b>Tax revenue returned to governments</b>	\$1.4 billion
<b>Carbon stored in Canada’s protected areas</b>	51,400 Gt CO <sub>2</sub> e — worth \$51.1 trillion in avoided damages
<b>UNESCO designations in the corridor</b>	2 (Rideau Canal World Heritage Site + Frontenac Arch Biosphere Reserve)
<b>Municipal councils formally opposing southern corridor</b>	5, plus 2 MPs (as of late February 2026)

## PURPOSE OF THIS SUBMISSION

This submission presents the case that the corridor decision is not only an environmental question but an economic one. The Frontenac Arch UNESCO Biosphere Reserve is economic infrastructure generating measurable, sustained returns. The southern corridor, as currently configured, would degrade this asset, trigger the loss of tourism revenue in communities that receive no station benefits, and create governance gaps between weakened provincial protection and enhanced federal project powers. ALTO must account for these costs before route selection is finalised.

## Section 1 — Protected Areas as Economic Infrastructure

Canada’s protected natural areas generate \$10.9 billion in GDP annually, supporting 150,000 jobs and returning \$1.4 billion in tax revenue (CPAWS, 2026, peer-reviewed by the C.D. Howe Institute and Simon Fraser University). New research confirms that every \$1 invested in protected areas generates \$3.62 in visitor spending. Protected areas play an outsized role in rural economies,

contributing up to 1.6% of rural GDP nationally. These are not marginal or speculative figures, they are empirically measured economic returns from assets that require ecological integrity to function.

Canada's protected areas also store the equivalent of emissions from 57.8 billion cars annually, a carbon storage function the CPAWS research estimates is worth \$51.1 trillion in avoided global economic damages. The Frontenac Arch, as an intact continuous north-south forest corridor, contributes to this function. A permanently fenced HSR corridor severing the Arch would reduce, permanently and irreversibly, both the ecological connectivity that sustains this carbon storage and the biodiversity that underpins the tourism product.

## **Section 2 – The Landscape at Stake**

The Frontenac Arch is an ancient granite bridge connecting the Canadian Shield to the Adirondack Mountains, the only continuous north-south forest corridor in eastern North America. Five forest ecosystems converge here. It holds the highest diversity of reptiles, amphibians, and invertebrates of any national park region in Canada, and is a nationally designated Important Area for Reptiles and Amphibians. Three formally designated Key Biodiversity Areas are within the Biosphere Region (Thousand Islands, Charleston Lake, and Frontenac Forests), with the Napanee Limestone Plain proposed as a fourth. The Rideau Canal, a UNESCO World Heritage Site, runs through its eastern extent. The Frontenac Arch Biosphere Network has confirmed it was not consulted by ALTO during initial corridor planning, a significant gap given UNESCO's expectation that infrastructure decisions within biosphere reserves involve stakeholder engagement.

The communities within the Biosphere (including South Frontenac and Rideau Lakes) and the broader Leeds and Grenville and Frontenac County areas support a nature-based tourism economy anchored by the Cataract Trail (a 104 km segment of the Trans-Canada Trail), Charleston Lake Provincial Park, Frontenac Provincial Park, the Rideau Canal heritage corridor, and a growing cycling and paddling sector. Visitors come to these communities for what they are, quiet, ecologically intact, dark-sky landscapes. That character is the economic product. It cannot coexist with a permanently fenced, 300 km/h rail corridor that bisects the landscape, fragments habitat, closes trails, and imposes a decade of construction disruption.

## **Section 3 – The Tunnel Effect: Tracks Without Stations**

International research on HSR and tourism consistently identifies a critical distinction: stations create tourism; tracks do not. This "tunnel effect" is documented across multiple jurisdictions. Research on Spanish HSR found that cities with stations saw measurable tourism increases, while cities the train passed through without stopping saw negligible or negative effects as competing destinations became easier to reach. China's experience shows that HSR promotes tourism in node cities but that non-station communities may lose market share as travellers are drawn more quickly to destination hubs. For communities in the Frontenac Arch, the southern corridor would make Ottawa, Peterborough, and Toronto more accessible to each other, potentially drawing visitors away from rural southeastern Ontario, while imposing all construction and operational burdens on the communities the line passes through.

MP Scott Reid has confirmed in writing that either HSR corridor option is likely to lead to lower VIA Rail ridership and service cuts through southeastern Ontario. VIA currently provides the region's primary passenger rail link for visitors arriving without a car. For destinations whose tourism brand is built on environmental responsibility, losing this low-carbon access mode compounds the damage from the southern corridor.

## Section 4 — Construction and Operational Impacts on Tourism

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### 4.1 Trail loss

The Cataraqui Trail runs directly through the proposed corridor alignment. Trail closures or permanent loss would eliminate itinerary-based cycling tourism and the network of B&Bs, outfitters, and cafés that depend on trail traffic. ALTO has acknowledged its intent to utilise existing corridor infrastructure to reduce land acquisition costs.

### 4.2 Road disruption

Dozens of grade separations would require extended closures on secondary roads that are often the only access to farms, cottages, B&Bs, heritage inns, and agri-tourism operations. Construction disruption is not a temporary inconvenience; it is a major civil infrastructure event lasting a decade or more.

### 4.3 Noise and landscape disruption

Heavy equipment, blasting, night lighting, and truck traffic are fundamentally incompatible with a region whose tourism product is quiet, dark skies, and natural vistas. These impacts persist during construction and, through permanent fencing and infrastructure, change the landscape character permanently.

### 4.4 UNESCO risk

Loss of ecological integrity provides grounds for review or downgrade of the Frontenac Arch Biosphere designation. A reputational downgrade would affect the entire region's international tourism positioning, with consequences that extend well beyond the physical footprint of the corridor.

## Section 5 — Regulatory Context

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- SARA Section 79 requires ALTO to notify the competent minister and assess impacts to listed species as soon as the likelihood is known — which it now is.
- CEPA declared road salts toxic in 2001; de-icing chemicals applied to HSR infrastructure in the corridor engage these obligations.
- Fisheries Act Section 36(3) prohibits deposit of deleterious substances in fish-bearing waters — relevant to de-icing runoff and construction sediment.
- Kunming-Montreal Global Biodiversity Framework — Canada committed to protecting 30% of lands and waters by 2030. Degrading a UNESCO Biosphere Reserve while pursuing this commitment creates a direct credibility gap.
- UNESCO Biosphere designation implies a commitment to sustainable development; infrastructure decisions that degrade ecological integrity risk international reputational consequences.

## Section 6 – Formal Requests

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1	<p><b>Commission a Tourism Economic Impact Assessment before corridor selection</b></p> <p>ALTO’s socioeconomic assessments have focused on productivity gains for corridor cities. A dedicated study is required to quantify what construction and permanent operations would cost the rural tourism economy of the Frontenac Arch, using the CPAWS methodology (\$3.62 return per \$1 invested) to establish the full opportunity cost of degrading this protected area.</p>
2	<p><b>Include protected-area economic valuation in the Environmental Assessment</b></p> <p>The Environmental Assessment must include a protected-area economic valuation using the CPAWS methodology, establishing the opportunity cost of degrading the Frontenac Arch Biosphere and the Rideau Canal World Heritage Site as economic assets.</p>
3	<p><b>Confirm that SARA Section 79 notification has occurred</b></p> <p>The obligation to notify the competent minister is triggered by current knowledge of likely species and critical habitat impacts, not by the formal start of the environmental assessment. ALTO must confirm and disclose whether this notification has been filed.</p>
4	<p><b>Direct Parks Canada and ECCC to engage formally with ALTO</b></p> <p>Parks Canada and Environment and Climate Change Canada must be formally engaged on the implications for the Rideau Canal UNESCO World Heritage Site and the Frontenac Arch Biosphere Reserve. The Frontenac Arch Biosphere Network, which was not consulted during initial corridor planning, must be designated a formal stakeholder.</p>
5	<p><b>Require binding mitigation commitments as pre-conditions of corridor selection</b></p> <p>Binding pre-conditions must include: continuity of the Trans-Canada Trail (Cataragui Trail section); wildlife crossing infrastructure through the Frontenac Arch at intervals supporting bear and deer dispersal; karst hydrogeological investigation of the Napanee Limestone Plain; and construction-phase access guarantees for tourism businesses on secondary roads.</p>
6	<p><b>Preserve VIA Rail services through southeastern Ontario</b></p> <p>VIA Rail services provide essential low-carbon tourist access to the Frontenac Arch region. ALTO must formally assess and publicly disclose the impact of corridor selection on VIA Rail routing and service frequency through southeastern Ontario before route selection is finalised.</p>

## Key Sources

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CPAWS (2026). Widely Enjoyed but Inadequately Valued: Understanding the Economic, Environmental, and Health Benefits of Canada's Protected and Conserved Areas. Peer-reviewed by C.D. Howe Institute and Simon Fraser University. cpaws.org

Albalade et al. (2017); Chen and Haynes (2015); Delaplace et al. (2014); Crozet (2017). Research on HSR tourism effects: tunnel effect, station vs. non-station communities.

Nature Conservancy of Canada. Frontenac Arch Natural Area. ("narrow pinch point"; one of the most important forest corridors east of the Rocky Mountains.)

UNESCO Man and the Biosphere Programme. Frontenac Arch Biosphere Reserve. Highest diversity of reptiles, amphibians, and invertebrates of any national park region in Canada.

WCS Canada (2025). Critical Ontario wildlife corridor gets national recognition (Thousand Islands KBA).

Species at Risk Act, S.C. 2002, c. 29. Section 79 obligations.

Fisheries Act, R.S.C. 1985, c. F-14. Section 36(3) deleterious substances prohibition.

MP Scott Reid, correspondence to constituents (2026): VIA Rail displacement risk from HSR corridor selection.

South Frontenac, Rideau Lakes, Stone Mills, Tyendinaga, Belleville: unanimous council opposition motions, February 2026.

MP Shelby Kramp-Neuman statement, February 25, 2026: opposition to both routes citing economic, environmental, and emergency services impacts.