



March 31, 2026

Right Honourable Mark Carney, M.P.
Prime Minister of Canada
80 Wellington Street
Ottawa, ON K1A

Dear Prime Minister,

Re: The Alto High-Speed Rail Proposal

Friends of the Salmon River is a community organization dedicated to safeguarding the Salmon River watershed in Eastern Ontario through environmental stewardship, education and conservation practices. We believe that the Salmon River is precious and loaded with natural riches, and we want to ensure that it will continue to be so in the future.

As with many citizen groups in our region and beyond, we are deeply concerned about the anticipated significant negative impacts of the proposed Alto High-Speed Rail (HSR) project. We are particularly concerned about the environmental threats to the rivers, lakes, wetlands, and entire watersheds within the Napanee Limestone Plain and subsequent fragmentation and disruption of wildlife connectivity. We are also alarmed by the grave potential social and economic impacts due to loss of access to areas by dead-end roads and the expropriation of homes, businesses and land.

Both the proposed Southern and Northern routes from Peterborough to Ottawa traverse the Salmon River watershed (approximately 921 square km)¹ and would have negative impacts on the fragile ecosystem and hydrology of our region. Here we outline [evidence-based citizen research](#)² of the harmful environmental impacts of the proposed Alto High-Speed railway on both routes.

Findings from the expert [environmental impact assessment](#)³ of the Salmon River Watershed conclude that neither route can be considered benign from an environmental perspective. The Northern route threatens to damage the Salmon River headwaters, considered to be the ecological engine of the watershed, as well as the intact Shield forests and wetlands that regulate water flow, support biodiversity, and provide resilience against climate change. The Southern route threatens already-stressed riparian and wetland habitats in the limestone bedrock portion of the watershed where the greatest restoration needs have been identified.

Further, the proposed HSR corridor will threaten many sensitive wetlands which support biodiversity, filter pollutants, and act as critical carbon stores. These represent serious hydrology and watershed impacts. The elevated rail embankment could act as a barrier to natural drainage in many areas, causing flooding, changes in the water table, and risks to groundwater and wells, in a region where most residents rely on wells. The ten-foot high fences would eliminate passage for

¹ Friends of the Salmon River, Signs of the Salmon Project 2010, <https://www.friendsofsalmonriver.ca/signs-of-the-salmon-project-2010/>

² Alto HSR Citizen Research <https://altohsr-citizenresearch.ca/>

³ Alto High-Speed Rail Project, Northern and Southern Route Options, Potential Impacts on the Salmon River Watershed <https://www.friendsofsalmonriver.ca/environmental-impact-assessment/>

humans and wildlife, alike. Farmland and secondary roads will be severed and migration routes for species such as the Blanding's turtle, that can migrate 6 kms annually and exhibit high fidelity to their habitats, will be destroyed.

The [Napane Limestone Plain](#)⁴ is a federally designated Key Biodiversity Area in Eastern Ontario, spanning over 2,000 square kilometres, featuring grasslands, wetlands, and the rare and globally significant alvar ecosystem. The Karst geology of this area consists of flat, rocky limestone pavements with deep cracks, riddled with underground caves, hidden rivers, sinkholes, and tunnels.

These areas flood in spring and dry out in summer, forming one of the rarest habitat types on the planet. High-speed rail is extremely sensitive to the ground beneath it with tracks that must stay almost perfectly level and stable. *“The underground drainage, flooding and potential collapse of underground rock masses make karst dangerous to build on⁵.”*

Any sinking or movement in the ground can cause serious safety problems at train speeds of 300 km/h. The engineering fixes for unstable karst ground — filling caves with cement, redirecting water, deep excavation — are exactly the things most likely to destroy the rare wetland habitats and caves that provide rare hibernacula for Endangered bat species, that depend on that underground water system. As such, HSR construction is extremely risky and damaging to the environment.

This area is also dotted with alvars, one of the world's rarest ecosystems, found only in the Great Lakes region of North America, and parts of Scandinavia. Alvars are habitats of bare rock and shallow soil. The plants and animals living here have adapted well to survive in these harsh spring flooding-summer drought-winter frost conditions with many unique to this area. The Napane Plain — the area which the southern Alto corridor would cross — has approximately 50 alvar sites, making it one of the most significant concentrations in the world. Changing the water patterns— by cutting ditches, burying culverts, or cementing underground channels — would make it impossible for the alvar plants to survive. Once destroyed, this habitat would not come back.

Alvars are also highly vulnerable to invasive plants. Any event that exposes fresh soil or creates disturbed edges gives aggressive invasive plants like common buckthorn, dog-strangling vine, garlic mustard, and invasive *Phragmites* a foothold they would otherwise struggle to find. Linear infrastructure — highways, rail lines, pipelines — is one of the most effective ways invasive plants spread across a landscape. A high-speed rail corridor through the Napane Plain would function as a continuous weed-introduction pathway.

The Salmon River Alvar is irreplaceable. This 847-hectare site is recognized for its exceptional ecological value as it supports a full range of alvar biodiversity (bare pavements, open grasslands, savanna, woodland, riverside marsh, and dry forest). It is home to a globally rare small plant, the only known population of Juniper Sedge (*Carex juniperorum*) in Canada. If the habitat at this site is destroyed, Juniper Sedge disappears from Canada entirely.

The Napane Plain is home to eight at-risk species. These include the endangered Henslow's Sparrow and the [Eastern Loggerhead Shrike](#)⁶, a small songbird with fewer than 30 breeding pairs remaining in Ontario. It specifically depends on the open alvar grassland that Alto's southern

⁴ <https://altohsrcitizenresearch.ca/napane-plain>

⁵ Lennox & Addington Stewardship Council (2022). Karst and Alvar. Prepared by Lennox & Addington Stewardship Council, May 2022.

⁶ <https://www.shrike.ca/>

corridor would cut through. Threatened bird species which nest on or near the ground would be directly impacted by corridor construction. Destroying alvar habitat eliminates the food sources and nesting sites for Species at Risk grassland birds while the construction zone simultaneously becomes the entry point for invasive plants that will degrade the surrounding alvar.

Construction of high-speed rail would also **disrupt the pristine water flowing through the Napanee Plain, including the Salmon and Napanee Rivers**. The water cycle is driven by an intricate underground plumbing system that carries water across the landscape, connecting alvar communities within hundreds of kilometres. This underground water system is largely unmapped. Rail construction through this fragile landscape and largely unmapped underground water system would trigger multiple simultaneous changes, making it difficult to estimate the full extent of damage to the environment.

One would assume that, with the rare and fragile biodiversity of this landscape, the area would be well protected. The Lennox & Addington Stewardship Council states plainly, however, that even with an ANSI (Area of Natural and Scientific Interest) designation — the main provincial tool for recognizing ecological significance — it “no longer defends that area from development.” The Salmon River Alvar meets all five ANSI criteria and is recognized as one of Ontario’s most ecologically significant sites.

For the Alto consultation process, this is significant. A federal environmental assessment triggered by the Species at Risk Act (SARA) would require Alto to demonstrate that the project would not destroy or damage the critical habitat of listed species. Given how many SARA-listed species live in this landscape, and how thoroughly aligned the southern corridor is with their documented habitat, that would be exceptionally difficult.

The southern corridor for Alto would pass through a landscape that is simultaneously: **geologically dangerous to build on, home to globally rare ecosystems found nowhere else in similar concentrations, the last stronghold in Canada for an endangered bird, and the only place on Earth where a rare plant still grows in this country**. These claims are part of the public record. They come directly from government ministries, conservation authorities, species recovery programs, and the naturalists who have worked in this landscape for decades.

Thus far, Alto has provided very limited information about the design and construction of this rail line. We stress that rigorous environmental assessments and a fleshed-out plan with more route and engineering details are urgently needed.

Friends of the Salmon River considers that a higher-frequency, electrified railway can be a very effective mode of transportation, significantly contributing to diminishing use of fossil fuels, and mitigating climate change. However, such an endeavour would only work if designed, constructed and operated properly in order to protect fragile and unique environments. We can not support the Alto project as it is currently presented due to harmful impacts on the unique environment, biodiversity, and hydrology of the area. We request that we be recognized as local environmental stewards of the Salmon River watershed and be included in ongoing communication on environmental protection.

Any infrastructure project of the scale of Alto HSR must be held to the highest environmental standards, and the Salmon River watershed — with its documented ecological significance, endangered species, and role within the Bay of Quinte remediation framework — deserves nothing less.

We call on the federal Minister of Transport and the Government of Canada to immediately halt the proposed Alto High-Speed Rail project that will have grave environmental and social

consequences for the Napanee Plain and Salmon River watershed and communities. We urge the federal government to explore other viable, environmentally sound and socially beneficial alternatives for reliable, accessible, low-carbon electrified high frequency rail. We need a fresh approach that could benefit all Canadians.

Sincerely,



Susan Moore,
President,
Friends of the Salmon River
Tamworth, Ontario
613-379-5958
infofriendsofsalmonriver@gmail.com
<https://www.friendsofsalmonriver.ca/>

cc.

The Honourable Steven MacKinnon, Minister of Transportation
The Honourable Julie Aviva Dabrusin, Minister of the Environment, Climate Change and Nature

Chris Malette, Member of Parliament for Bay of Quinte
Mark Gerretsen, Member of Parliament for Kingston and the Islands

Alto Public Consultation Brief, <https://en.consultation.altotrain.ca/>

Hon. Pierre Poilievre, Leader of the Official Opposition
Dan Albas, MP, Shadow Minister for Transport
Ellis Ross, MP, Shadow Minister for Environment and Climate Change
Shelby Kramp-Neuman, MP Hastings—Lennox and Addington—Tyendinaga
Scott Reid, MP Lanark-Frontenac
Michael Barrett, MP Leeds—Grenville—Thousand Islands—Rideau Lakes

Don Davies, NDP Interim Leader
Alexandre Boulerice NDP, Critic - Environment and Climate Change

Elizabeth May, Green Party MP

Ontario Members of Provincial Parliament
Ric Bresee, MPP Hastings—Lennox and Addington
John Jordan, MPP Lanark-Frontenac-Kingston
Ted Hsu, Kingston and the Islands
Tyler Allsopp, Bay of Quinte
Hon. Steve Clark, MPP Leeds—Grenville—Thousand Islands and Rideau Lakes