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April 21, 2026

To: Alto Project Team

Re: Alto High Speed Rail Public Consultation

Established in 2005, the Greenbelt Foundation is a charitable organization dedicated to supporting the integrity and success of Ontario's Greenbelt. Our work focuses on ensuring that the Greenbelt's interconnected natural and agricultural systems are protected and continue to provide clean air and water, locally grown food, and greenspace to Ontarians, while supporting thriving rural economies and the larger regional economy.

The Greenbelt protects over 2 million acres of farmland and highly sensitive ecosystems in the Greater Golden Horseshoe including forests, wetlands, major aquifers, rivers, and lakes. It is a critical and irreplaceable asset that helps ensure the resources communities rely on to enhance quality of life and strengthen their resilience can be sustained over the long-term.

In addition, the Greenbelt also supports significant regional economic activity by providing favourable conditions for investment and employment, including agricultural production and food processing as well as recreation and tourism. Each year, the Greenbelt contributes more than \$12 billion to Ontario's GDP, supports over 200,000 full-time jobs, and provides approximately \$4.4 billion in federal and provincial tax revenue.¹

We recognize the importance of investments in transportation infrastructure and support improvements that enhance mobility and economic connectivity. Our comments are focused on understanding the potential impacts on the Greenbelt associated with the construction and operation of the proposed Toronto to Quebec City high-speed rail corridor (ALTO). We are seeking to inform ongoing analysis by the federal government to establish baseline data, identify the full scope of impact, particularly for rural and agricultural communities, and determine a preferred alignment.

Our goal is that a combination of avoidance, mitigation and offset measures would result in a net benefit and minimize impacts on critical natural systems or key economic sectors, including agriculture and the agri-food sector.

¹ https://greenbelt.ca/research-report/economic_impact_assessment/



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The Greenbelt: Supporting Agriculture, Resilient Landscapes, Water Security and Recreation

Among other activities, the Foundation undertakes research, supports initiatives and collaborates with governments, communities and industry partners to strengthen the Greenbelt's natural and agricultural systems, local economies, and regional resilience.

These efforts generate evidence, inform decision-making, and support policies and investments that sustain the long-term health and productivity of the Greenbelt.

Agriculture

Our research highlights the productivity and strategic importance of the Greenbelt's prime agricultural lands which represent approximately 6% of Ontario's total agricultural area. Greenbelt farms generate 68% higher revenues per acre than the provincial average and supply a disproportionate share of Ontario's fruit and vegetable production, including 50% of the province's fruit acreage and 11% of its vegetable acreage. Nearly 60% of Ontario's food processing capacity is located within or near the Greenbelt, creating a robust agri-food network that links farmers to processors, distributors, and consumers.²

The Foundation has worked with provincial and industry partners to strengthen local food supply chains and highlight investment opportunities in a region that is expected to remain a stable and productive source of food as other major food producing jurisdictions experience disruptions.³

Linear infrastructure projects can lead to direct loss and fragmentation of farmland in the Greenbelt, isolate farm parcels, impede farm operations, and increase development pressures in rural areas.⁴ Design requirements associated with the ALTO project, including the use of barriers and controlled access, will further constrain farming and reduce overall farm viability.

We need to carefully listen to the concerns and needs of Ontario farmers and agricultural businesses in the course of planning for the ALTO HSR.

Resilient landscapes

Situated in Canada's most biodiverse region, maintaining ecological connectivity across the Greenbelt is essential to sustaining regional biodiversity, supporting resilient landscapes and

² https://greenbelt.ca/research-report/ag_report_feb19/

³ https://greenbelt.ca/research-report/gb_agriculture_economic_impact/

⁴ https://greenbelt.ca/research-report/linear_infrastructure_report/



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ensuring the long-term conservation and ecological integrity of the Greenbelt.⁵ Foundation research indicates that over the last 20 years, the number of species-at-risk (SAR) within the Greenbelt has increased by 68%, demonstrating its vital function as a refuge for species affected by habitat loss, climate change and development pressures in the Greater Golden Horseshoe (GGH) Region.⁶ The Foundation has also quantified the economic value of ecosystem services that protect and enhance communities and depend on landscape resilience.

The Foundation is currently working with partners to develop a strategy to protect, enhance and restore ecological connectivity across the Greenbelt. We also continue to support municipalities in valuing, maintaining and enhancing ecosystem services that provide clean air and water, stormwater and flood management, temperature regulation and recreation to their residents and communities. These services are valued in the billions. Provincially significant wetlands in the Greenbelt provide \$224 million in flood control annually and \$18 million in public health benefits from filtering out pollutants from the air.⁷ A recent case study completed for the Grindstone Creek watershed determined that it provides the equivalent of \$2 billion in capital infrastructure for stormwater management alone.⁸

A loss of connectivity would disrupt species movement across an ecological network that includes one quarter of all Protected and Conserved Areas in southern Ontario and contributes to Canada's 30x30 target. This network also supports several Key Biodiversity Areas that contribute to the persistence of biodiversity at a national scale,⁹ as well as landscapes associated with the country's first Indigenous botanical survey documenting First Nations' relationships with plants and trees on the landscape.¹⁰ The resulting loss of biodiversity would degrade ecosystems and increase the vulnerability of communities to the impacts of climate change.

Water security and recreation

Any route alignment would involve traversing the Oak Ridges Moraine which is an iconic and significant component of Ontario's Greenbelt.

Often referred to as the "rain barrel of southern Ontario," the Oak Ridges Moraine (ORM) acts as the Greater Toronto Area's primary groundwater recharge system. The ORM directly provides

⁵ <https://greenbelt.ca/research-report/near-urban-nature-network/>

⁶ Ontario Nature. (2026). Species At Risk in the Greenbelt: Successes, Challenges and Opportunities. (Unpublished report)

⁷ https://greenbelt.ca/research-report/ontarios_good_fortune_greenbelt_natural_capital/

⁸ <https://naturalassetsinitiative.ca/documents/grindstone-creek-watershed-natural-assets-management-project/>

⁹ www.kbacanada.org

¹⁰ www.gibsurvey.ca



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drinking water to approximately 250,000 rural residents and is a critical source of clean drinking water for seven million more. The permeability of the ORM and its key hydrological features and areas are protected because urbanization can lead to reduced water storage and degraded water quality. Foundation research indicates permeability is decreasing on the ORM. Although the proportion of impervious surfaces on the moraine remains under 10%, there has been a shift toward more frequent and intense drought conditions, reflecting stresses on groundwater quantity across the Greenbelt and southern Ontario.

The Oak Ridges Moraine Trail is also a significant recreational feature on the landscape, spanning the Moraine from end to end, across 268km. The Trail connects multiple communities along the Moraine and a larger parks and trails network in the Greenbelt that includes the Bruce Trail, TransCanada Trail, Greenbelt Cycling Route, significant river valley trails from the Credit River to the Rouge River, and national and provincial parks. The Oak Ridges Moraine Trail Strategy, released in 2025, is advancing opportunities for reconciliation and cultural connections along the trail with the Williams Treaties First Nations and Mississaugas of the Credit First nation.¹¹

Greenbelt Policy Context for Linear Infrastructure

Through legislation and regulatory policies, the Province of Ontario establishes land use plans related to the Greenbelt Plan Area including the Greenbelt Plan. Federal projects typically align with provincial land use plans and policies to support good outcomes, decision-making, and public trust.

Greenbelt Plan policies permit linear infrastructure in the Greenbelt where it supports rural, agricultural, recreation, or tourism uses or where it provides essential connections that support growth and economic development outside the Greenbelt. In such cases, projects must demonstrate a clear public need, confirm that no reasonable alternatives exist outside the Greenbelt, and apply best practices to avoid, minimize, and mitigate environmental impacts.

Portions of the study corridor, as referenced above, indicate that the route will cross areas of the Oak Ridges Moraine and the Protected Countryside which are major sub-components of the Greenbelt. Relevant policies prioritize co-location of infrastructure within existing or planned corridors to minimize the project's footprint, landscape fragmentation, and disturbance. Planning and design must therefore minimize the extent of Greenbelt lands affected to maintain critical ecosystem services that communities rely on, such as a safe supply of drinking water.

¹¹ <https://greenbelt.ca/programs/oak-ridges-moraine-trail-strategy/>



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Policies in the Oak Ridges Moraine Conservation Plan are intended to protect ecological integrity and key hydrological functions, including groundwater recharge, filtration and storage. Greenbelt policies also require infrastructure planning to follow a watershed-based approach and avoid impacts on key natural heritage and hydrological features, and on the quality and quantity of surface water and groundwater.

New or expanding infrastructure must also avoid specialty crop areas and prime agricultural lands, where possible, recognizing these lands as a finite and critical resource. Agricultural Impact Assessments must be used to evaluate linear infrastructure projects to ensure that prime agricultural areas and farming viability are protected. Ontario's success depends on our ability to become ever more self-sustaining in the face of global uncertainties. A strengthened source of locally grown food and a thriving agri-food sector is critical to that ability.

Ontario thrives when the Greenbelt thrives because it protects the land and water systems that are vital to community health and the province's growth and prosperity.

Conclusion

We note that significant concerns have been raised by agricultural groups in Ontario and Quebec about the consultation process. As with any major undertaking, we encourage project timelines that allow for meaningful and effective Indigenous consultation processes, along with fulsome engagement with affected residents, farmers, businesses, and rural communities.

The Foundation looks forward to seeing the results of the public consultation process, the delineation of the proposed route, and the findings of the Impact Assessment and other studies.

Thank you for the opportunity to provide comments. We welcome and encourage further engagement on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward McDonnell". The signature is fluid and cursive.

Edward McDonnell
Chief Executive Officer