



April 22, 2026

Alto

Attention: Consultation- Proposed ALTO High Speed Rail Project
Submitted via Alto Consultation Website

RE: Proposed Highspeed Rail Project

Introduction

On behalf of the Ontario Farmland Trust (OFT), thank you for the opportunity to provide feedback regarding the proposed Alto high speed rail project. OFT commends the vision of the Government of Canada and Alto to construct Canada's first high speed rail network with the intention to "reinvent the way we travel and transform our daily lives, our economy and our future". The Alto project proposes approximately 1,000 kilometres of railway lines that would connect major cities in the Toronto-Quebec City Corridor. However, OFT along with various agricultural groups, conservation groups, community organizations as well as farmers operating within the areas of the proposed project have concerns.

About the Ontario Farmland Trust

OFT is a charitable, not-for-profit organization dedicated to protecting Ontario's farmlands and associated agricultural, natural and cultural landscapes. We do this through direct land securement, stewardship, research and policy advocacy to ensure it remains available for agriculture and community benefit in perpetuity.

Since its founding, OFT has worked with farmers, landowners, municipalities, conservation organizations, and governments to:

- Secure conservation easements on farmland
- Protect working agricultural landscapes
- Support sustainable agriculture
- Provide land access opportunities for new farmers
- Promote farmland stewardship and education

Projected Impacts on Agricultural Operations

The Alto project raises a number of concerns related to the impacts surrounding the agricultural, natural, cultural and ecological landscapes of Ontario and Quebec. Construction along the proposed travel corridor would have a direct impact on road systems as access to several roadways would become limited. This would have a major impact on agricultural communities as it would create difficulty for farmers attempting to move equipment or access their fields during periods of important planting or harvesting throughout the growing season. Furthermore, partially opened or closed roads will prevent rural residents from accessing necessities including jobs, markets, as well as their community. This creates a detrimental impact for rural communities that are often struggling to maintain their economic security while providing food resources and security to the economy at all levels.

Impacts to Farmland

The proposed Alto route is placing significant pressures on farmers within Eastern Ontario. With mounting development pressures, concerns of expropriation and a loss of farmland, the importance of this farmland can not be stressed enough. Farmland loss is a national issue and according to the 2021 Census of Agriculture data, Ontario alone loses approximately 319 acres of farmland every day. Between 2016 and 2021, Canada experienced a 3.2% total decrease in farm area¹. The rate of loss, driven by urban sprawl, infrastructure development, aggregate expansion, and other non-agricultural uses is unsustainable.

Farmland is a finite resource that comprises approximately 5% of Ontario's land base yet supports the agri-food sector employing over 871,000 Ontarians and contributing more than \$51 billion annually to the province's GDP². Everyone relies on agriculture in some form or another and therefore the loss of farmland impacts our access to quality local food, but also puts jobs at risk and impacts the economic resiliency of these markets.

These lands are not just resources for Canada but also serve critical natural and cultural landscapes that are increasingly at risk.

The Right Honourable Mark Carney is implementing the "Canada Groceries and Essentials Benefit" to tackle food costs while also providing investments to food suppliers, supply chains and bolster food security. OFT applauds these efforts and stresses the importance of protecting agricultural land to support such initiatives. Food security is required for national security. It is crucial to ensure we can support current and future generations of Canadians

¹ <https://ofa.on.ca/newsroom/ontario-farmland-under-intense-pressure>

² www.ontario.ca/page/2025-local-food-report

without over-reliance on foreign markets and rising costs that would severely impact us all. OFT acknowledges the importance of providing safe, cost effective and efficient transportation services to connect Canadians on a social, cultural and economic level. However, this should not come at the cost of crucial and finite agricultural lands as we continue to stress the importance of food security. We cannot improve our economy if we cannot maintain our food network.

The construction of the proposed route by Alto would be detrimental to both the agricultural livelihoods and agricultural economy of Ontario.

Recommendations from OFT

Ontario Farmland Trust firmly stands behind the Ontario Federation of Agriculture (OFA) call for an immediate suspension of the Alto high-speed rail project in pursuit of a cautious, transparent approach that allows for a thorough economic, social and environmental impact assessment and meaningful consultation with affected agricultural, forestry and rural communities³. We call on decision makers to pause the project until these critical steps are fully completed and urge all levels of government to prioritize these considerations in their decision making.

With the currently proposed travel route for the Alto high speed rail line, OFT calls on Alto to conduct an Agricultural Impact Assessment (AIA). AIA's should be a tool utilized by Alto during the consultation process as they have the ability to identify and evaluate the potential impacts of non-agricultural development on agriculture, as well as generate recommendations for avoiding, minimizing or mitigating adverse impacts⁴. While efforts have been made to conduct field studies, as well as engage with impacted property owners, the Alto project has neglected to identify the project impact to agriculture landscapes by not conducting an AIA.

Furthermore, OFT calls on Alto to amend the currently proposed travel route to avoid prime agricultural areas to minimize and mitigate the loss of agricultural soils taken out of production.

The removal of any farmland is detrimental to both the agricultural landscape and economy of Ontario. Agricultural operations require large, integrated, contiguous agricultural areas to

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<https://ofa.on.ca/newsroom/farmers-call-for-responsible-agriculture-first-planning-in-alto-high-speed-rail-development/>

⁴ <https://www.ontario.ca/page/publication-861-agricultural-impact-assessment-aia-guidance-document>

farm efficiently and to maintain viable agricultural operations. Therefore, Alto should avoid breaking farms into smaller parcels and keep farm operations whole.

Conclusion

OFT thanks you for the opportunity to provide these comments and I remain available for further discussion.

Sincerely,

Martin Straathof, MSc
Executive Director
Ontario Farmland Trust