



WILDLIFE PRESERVATION CANADA

42 Carden St, Guelph ON, N1H 3A2

admin@wildlifepreservation.ca

wildlifepreservation.ca

1-800-956-6608

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To: ALTO, Cadence, Transport Canada and Via Rail

Re: ALTO high-speed rail, Toronto to Quebec

Wildlife Preservation Canada (WPC) expresses deep concern regarding the proposed southern route of ALTO's high-speed rail project connecting Toronto to Quebec. This development will have unquestionable and irreversible negative impacts on a globally rare alvar ecosystem and decimate eastern Canada's incredibly small remaining population of critically endangered loggerhead shrikes.

The proposed southern rail line cuts directly through the Napanee Plain Important Bird and Biodiversity Area (ON152). The Napanee Plain is an ecologically significant landscape in eastern Ontario characterized by shallow soils over limestone bedrock, creating rare alvar habitats and shrubby grasslands. Alvar habitats are globally rare (existing only in Scandinavia and the Great Lakes Basin of North America) and support unique biodiversity. Approximately 75-85% of all of North America's alvars are located in Ontario, primarily in four isolated areas, one of which is the Napanee Plain. These open, prairie-like habitats support unique, specialized plant communities and are critical breeding grounds for grassland birds, including the endangered loggerhead shrike.

The eastern loggerhead shrike is one of Canada's most endangered birds. Fifty years ago, shrikes were found across eastern North America. They have been completely extirpated from the Maritime provinces, with the last known breeding pair observed in 1972. Less than 100 loggerhead shrikes remain in the eastern population, as confirmed annually since 1994. Today, less than 60 adult individuals are expected each year (since 2018), despite intensive survey effort. Due to habitat loss and degradation by human activity, including road construction, solar farms, quarrying and other developments, very limited critical alvar habitat remains. Of the four larger alvar areas in Ontario, only two remain of suitable quality for breeding loggerhead shrikes. The Napanee Plain carries by far the majority of eastern Canada's population. Across the past 10 years, 65% of all breeding loggerhead shrikes in the eastern population have been found on the Napanee Plain.

The highlighted area proposed for the southern route of ALTO's high-speed rail line encompasses a staggering 81% of all confirmed loggerhead shrike breeding sites in the Napanee Plain. Twenty-nine out of 36 breeding territories confirmed since 2015 lie directly on the route. This development would decimate eastern Canada's loggerhead shrike population, irreplaceably.

Although WPC is not a lobby or advocacy organization and does not typically engage in activities that either publicly support or oppose development, we are submitting a comment on this proposal due to the extreme devastation it would cause to the critically endangered species we are the

custodians of. The proposed southern route also encompasses a nature reserve owned by the Nature Conservancy of Canada (NCC) on which our organization operates critical conservation activities.

The Napanee Plain Alvar Nature Reserve (the “Reserve”) is a 300-acre conservation parcel owned and managed by NCC, located just north of Newburgh on the southeast corner of County Rd 27 and Nugent Rd. Since 2012, critically endangered birds have been housed and released on the Reserve under the The Eastern Loggerhead Shrike Recovery Program— a binational multi-partner effort to restore wild loggerhead shrike populations in eastern North America, led by WPC. The Reserve is one of only two release sites in the program. Access to the Reserve is restricted to research teams due to the sensitivity of the alvar habitat and delicacy required near the shrike pens.

The release of conservation-bred birds is an activity of high priority in the Federal Recovery Strategy for Loggerhead Shrikes (Environment and Climate Change Canada 2015). It has been reflected as a provincial priority in Ontario’s Government Response Statement for Loggerhead Shrike Recovery (Government of Ontario, 2017) and in the review of progress towards the protection and recovery of Ontario’s species at risk (Government of Ontario, 2022). The recovery program is vital to prevent the disappearance of loggerhead shrikes from Canada.

Our main concerns are:

1. Degradation, fragmentation and destruction of the Napanee Plains: Linear infrastructure of this scale—cutting across watersheds, wetlands, river systems, alvars and grasslands—poses inherent and significant risks to the health of many ecosystems. Fragmentation of the alvars and grassland corridors that are critical for breeding and migrating loggerhead shrikes (and other grassland birds) will destroy an irreplaceable landscape and fragment an already extremely vulnerable population. The wall-like, fenced area that will accommodate the high-speed rail and the noise barrier that the train creates present an ecologically significant barrier to wildlife movement across the landscape. The direct results of habitat loss in this Important Bird and Biodiversity Area will be significant, spanning innumerable plant, animal and insect species. 65% of all breeding loggerhead shrikes in eastern Canada exist on the Napanee Plains, and 81% of all breeding territories on the Napanee Plains lie in the proposed southern route of the rail line.
2. Noise disruption: Anthropogenic noise significantly affects various behaviours and the physiology of birds, and has strong negative effects on reproductive responses. Effects on habitat use, stress, communication and fitness have all been well-documented across bird species and as a result of various industrial noises. Birds may cease to set up territory on habitat adjacent to the railway. For birds that do use the adjacent habitat, noises and vibration during both construction and operation of the railway will disrupt breeding, hunting and the detection of predators. This is of particular concern for young loggerhead shrikes confined to release enclosures prior to reintroduction on the Reserve.
3. Hydrological effects: This development would disrupt hydrological connectivity across watersheds and cause long-term, irreversible impacts on alvar ecosystems. Our concern is the extreme sensitivity of alvar habitats to changes in groundwater flow and drainage. Alvar plants have an extreme dependence on shallow groundwater, especially during early spring and summer. Large-scale construction and railway vibrations can cause significant hydrological disruption, which can lower groundwater levels over a wide area. Key impacts include reduced water supply for nearby wells, drying of wetlands, and altered local groundwater flow paths. Because of the fracture

network in the underlying limestone, changes in regional water level can be very rapid, making alvars particularly vulnerable. These hydrological changes are of concern to us not only for the alvar habitat that loggerhead shrikes are dependent upon, but also for the wells used for watering cattle within our conservation operations and landowner partnerships (cattle ranchers) who steward wildlife habitat on the Reserve and other loggerhead shrike breeding territories on the Napanee Plain. Furthermore, hydrological changes may play a role in increasing wildfires in the area, which the alvar habitat, endangered birds and the wooden release enclosures are all vulnerable to.

WPC will continue to advocate for the best possible habitat for our focal species. We echo the sentiments voiced by Watersheds Canada: *“These impacts do not occur in isolation. They directly intersect with, and may undermine, decades of publicly and privately funded stewardship work. The very sites where governments and communities have invested in restoration and protection may be placed at risk by corridor routing decisions, construction practices, or insufficient mitigation measures.”* The work of multiple conservation, education, agricultural and heritage organizations will be negated with this development, with an unacceptable cost. As stated by the Frontenac Arch Biosphere Network, *“The reduction in greenhouse gas emissions gained by the Alto HSR cannot be won at the expense of intact and connected wetlands and forests, the survival of species at risk of extinction or extirpation, international recognition for Canada’s responsible stewardship of globally significant ecosystems and the long-term well-being of rural communities.”*

For all of the reasons stated above, Wildlife Preservation Canada strongly urges ALTO, Cadence, Transport Canada and Via Rail to reconsider the route of the high-speed rail line to exclude the Napanee Plains. If the railway development intersects loggerhead shrike breeding grounds, it would impact WPC’s ability to carry out vital endangered species recovery activities that have been developed over three decades and have cost millions of taxpayer, industry partner and private donor dollars in both Canada and the US. This railway will decimate the habitat used by over half of the population of endangered loggerhead shrikes in eastern Canada. This will undoubtedly accelerate or cause the extirpation of the species from Ontario.

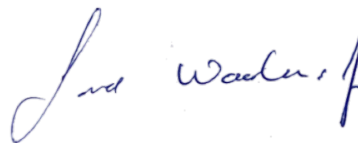
We are happy to provide our expertise and further guidance to find mutually beneficial solutions for development and conservation to mitigate the effects of the high-speed railway on critical alvar habitat and avian species-at-risk.

For your urgent consideration,



Helmi Hess

Lead Biologist
Eastern Loggerhead Shrike Recovery Program
Wildlife Preservation Canada
h.hess@wildlifepreservation.ca



Lance Woolaver, PhD

Executive Director
Wildlife Preservation Canada
lance.woolaver@wildlife.preservation.ca