



Algonquin to Adirondacks Collaborative  
1338 Wellington St. West - Unit 10  
Ottawa, ON,  
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Nov.3, 2025

**Re: Comments on Highway 401 Planning Study from Kingston to Gananoque**

To the Ontario Ministry of Transportation and AECOM Canada ULC:

The Algonquin to Adirondacks (A2A) Collaborative is dedicated to protecting and enhancing the ecological connectivity of the region between Algonquin Park in Ontario and the Adirondacks in New York State. The A2A region is the only viable north-south pathway for terrestrial wildlife to follow owing to the stepping-stone effect of the Thousand Islands of the St. Lawrence River. Animals are otherwise blocked by the Great Lakes, lack of connected habitat in Southwestern Ontario and the ever-widening of the St. Lawrence east of Brockville. Therefore, for animals to cross to and from the United States, as they need to do, they must cross here in the Frontenac Arch region.

Highway 401 critically bisects this region, meaning any proposed changes to the highway are of paramount importance to our organization and represent both an opportunity and a challenge for achieving an ecologically connected landscape. Therefore, the A2A staff and Board of Directors are providing these comments on the Highway 401 Planning Study from Kingston to Gananoque. Thank you for the opportunity to contribute during this initial planning phase.

**Ecological Imperative**

The Right to Roam Report <sup>1</sup> provides the best guidance available to you for your deliberations, and we highly recommend that it be followed to the greatest degree possible. As noted in it, we believe it is critical to maintain and enhance ecological connectivity within the Frontenac Arch, a globally significant UNESCO Biosphere Reserve. This area serves as a fundamental link between the Appalachian Mountains and the boreal forests of Northern Ontario, supporting a rich

diversity of species, many of which are at risk. While this planning study extends partially outside the Frontenac Arch, there are several important natural areas within the region, including provincially significant wetlands, that provide essential linkages for wildlife movement. These areas should be fully considered in the decision-making process to ensure that ecological connectivity is prioritized. Without appropriate mitigation, the proposed expansion of Highway 401 to an ultimate eight lanes would fragment critically sensitive habitats and create further barriers for wildlife movement.

Our specific concerns regarding highway expansion between Kingston and Gananoque center on a priority wildlife linkage identified in our recent connectivity mapping work. This linkage encompasses sections of Highway 401 and several creeks that serve as important hydrological and ecological linkages for terrestrial and aquatic species movement.

Steventown Creek, Joyceville Creek, and Grass Creek provide a network of wetlands, forests, and riparian habitats that create pathways for a variety of species. Previous studies<sup>2</sup> have noted the presence of several species at risk in or near the study area, including Black Tern, Northern Map Turtle, Least Bittern and Gray Ratsnake, species who rely on these habitats and the connectivity that the culverts provide. The rehabilitation of these culverts presents key opportunities to integrate ecological design principles to ensure safe passage for wildlife and enhanced connectivity across this section of Highway 401.

## **Recommendations**

To ensure that infrastructure upgrades minimize environmental impact and help preserve connectivity within ecologically sensitive environments, we respectfully offer the following recommendations for your full consideration:

- Prioritize replacing the three existing culverts at Joyceville Creek (Site 07X-0162/C0), Steventown Creek Culvert (Site 07X-0155/C0), and Grass Creek Culvert (Site 07X-0156/C0) with larger, open-span underpasses that allow both small and large species to safely travel beneath the highway. These structures should provide adequate light and

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<sup>1</sup> Black, K., Danby, R., & Urquhart, O. (2023). The Right to Roam: A Strategy to Reconnect a Continental Wildlife Pathway in the Frontenac Arch. [https://www.a2acollaborative.org/uploads/7/6/8/5/7685208/a2a\\_road\\_ecology\\_report.pdf](https://www.a2acollaborative.org/uploads/7/6/8/5/7685208/a2a_road_ecology_report.pdf)

<sup>2</sup> Ministry of Transportation Eastern Region. (2016). Highway 401/ Highway 15 Interchange Operational Improvements. <https://hwy401kingstontoganoque.ca/wp-content/uploads/GWP-4059-11-00-FINAL-TESR-Hwy-15-Jan-2016.pdf>

openness to encourage wildlife use and incorporate naturalized features—such as ledges, logs, rocks, and root wads—to support habitat continuity and species movement.

- Explore wildlife mitigation options, including fencing to direct animals to culverts, along the southern border of the Gananoque Provincial Wildlife Area which provides a large area of essential forest and wetland habitat for wildlife moving through the area.

- The replacement design for the CNR/Gananoque River Bridge (Site 16X0099/B0) should include appropriate dry passage and habitat features to accommodate the movement of mammals, reptiles, and amphibians under the 401. This recommendation aligns with the *Town of Gananoque's Draft Official Plan*<sup>3</sup> which identifies wildlife crossings and corridors as key considerations in supporting local biodiversity and maintaining ecological connectivity.
- Ensure that potential environmental impacts are limited by choosing an alternative that limits disturbance of sensitive ecological areas like the Gananoque Wetland and the Provincially Significant Downey Wetland which are both important linkages for wildlife movement.
- Install appropriate wildlife fencing to ensure animals are directed towards culverts/underpasses.
- Apply a long-term, climate-resilient lens to all infrastructure upgrades, proactively accommodating increased wildlife movement and severe weather patterns.

The A2A Collaborative Board of Directors firmly believes that implementing these recommendations will help ensure that the Highway 401 retrofits will meet the increasing demands of our transportation network while maintaining the ecological integrity and connectivity of this landscape.

Thank you for considering these comments as a vital part of your planning process. We look forward to seeing the next stage of designs that truly reflect the ecological significance of this landscape and ensure its connectivity for wildlife for generations to come.

Sincerely,



Jessica Lax, Algonquin to Adirondacks Collaborative  
On behalf of the A2A Collaborative Board Members and Staff

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<sup>3</sup> Town of Gananoque Draft Official Plan. (2024).

<https://s3.ca-central-1.amazonaws.com/gananoque.ca/s3fs-public/DRAFT%20Official%20Plan%20for%20Public%20Comment.pdf>