

33 Questions. Few Answers.

How Alto responded to detailed public consultation questions about the Eastern Ontario route selection

Alto HSR Citizen Research · March 2026

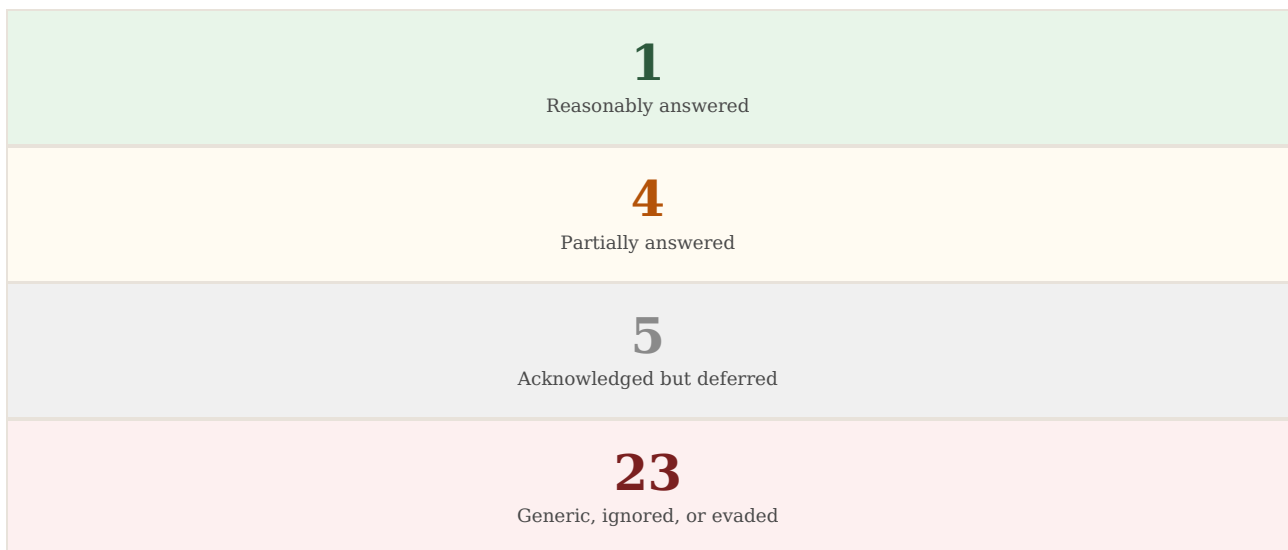
SUMMARY

In March 2026, Alto HSR Citizen Research submitted **33 detailed questions** to Alto as part of the formal public consultation on Eastern Ontario route selection. The questions were organized into 8 themes and designed to elicit specific, evidence-based responses. Alto replied with 8 thematic paragraphs that **did not reference individual question numbers**, allowing general statements to stand in for specific answers.

Of 33 questions: **1 was reasonably answered, 4 were partially answered, 5 were acknowledged but deferred, 9 received only generic language that did not address the specific question asked, and 14 were completely ignored.**

THE NUMBERS

Response Scorecard



Alto restructured the submission into theme-based paragraphs rather than answering each question individually. This allowed them to address a topic in broad terms while bypassing the specific, pointed questions within it.

The Most Significant Gaps

Geotechnical studies have not been done (Q2)

Alto admitted that **"in-depth geotechnical studies will be able to take place once we have an alignment."** They are selecting a corridor *before* doing the geological work to evaluate it — and asking the public to comment on route options that haven't been geologically assessed.

The Frontenac Arch was not mentioned (Q14)

Asked directly how Alto would mitigate bisecting the Frontenac Arch UNESCO Biosphere Reserve, Alto **did not mention the Frontenac Arch at all**. This is arguably the most environmentally significant question in the submission. It was completely ignored.

Wells and septic: "too early" (Q29-Q30)

Alto dismissed both groundwater questions as "too early" and referenced field studies that cover surface water and aquatic habitat — **not groundwater hydrogeology, not private well impacts, not septic system vulnerability**. The question about setback distances from wells (Q30) was not acknowledged.

HS2 was not named (Q3)

Asked specifically about lessons from the UK's HS2 project, Alto said only that they had reviewed **"a range of recent large-scale rail and infrastructure projects."** No project was named. No specific lesson was identified.

Adjacent property owners get nothing (Q19)

Whether property owners whose land is adjacent to — but not expropriated by — the corridor would receive compensation for loss of property value was **completely ignored**. This question affects potentially thousands of properties along any corridor.

No per-kilometre cost comparison (Q32)

Alto repeated the publicly known \$60-\$90 billion estimate but **refused to provide per-kilometre cost comparisons** to international HSR projects. This is the calculation that would reveal whether their estimates are realistic relative to comparable projects worldwide.

Question-by-Question Assessment

Below is each of the 33 questions submitted, followed by an assessment of Alto's response.

Questions are colour-coded: ANSWERED PARTIAL DEFERRED GENERIC IGNORED

1. Route Selection and Evidence Base Q1-Q4

Alto's response (summary): *The corridor was based on objectives such as minimizing community/ecosystem impact and meeting HSR technical requirements. A ~10 km wide corridor is being studied. Geotechnical studies will take place once there is an alignment. The team has reviewed international best practices.*

Q1 What criteria are being used to evaluate and compare the Northern and Southern route options, and how will each criterion be weighted?

Alto listed general objectives but **provided no criteria list, no weightings, and no comparison framework**. If the public cannot see how route decisions are scored, the consultation is performative.

GENERIC

Q2 What geological analysis has been conducted to inform route selection? Have independent experts reviewed Alto's geological and geotechnical assumptions?

Alto admitted geotechnical studies will happen **after an alignment is selected**. This means they are asking the public to comment on route options that have not been geologically assessed. The question about independent expert review was not addressed.

DEFERRED

Q3 How do you plan to incorporate lessons learned from comparable international projects – specifically the UK's HS2?

Alto said they reviewed "a range of recent large-scale rail and infrastructure projects" but **refused to name HS2 or any specific project** and identified no specific lessons.

GENERIC

Q4 Is it Alto's priority to use existing transportation corridors, to avoid populated areas, or some other principle? Where these objectives conflict, how will trade-offs be resolved?

Alto restated the objectives but **provided no conflict-resolution framework**.

GENERIC

2. Aggregate, Materials, and Waste Q5-Q8

Alto's response (summary): *Ballast is estimated at a few million tons for the entire network. More precise estimates would be premature. Alto aims to maximize Canadian sourcing. Disposal sites will be identified after final alignment.*

Q5 How much aggregate per kilometre is required for each route? Please provide figures for both the Northern and Southern options.

Alto gave a network-wide ballast estimate but **no per-kilometre figures and no route comparison.**

PARTIAL

Q6 Where will aggregate be sourced from for each route?

No answer. Sourcing will be determined after alignment selection.

DEFERRED

Q7 How much excavated material will require disposal in landfill? Where are the proposed disposal sites?

No answer. Disposal sites to be "identified during procurement."

DEFERRED

Q8 What are the estimated CO₂ emissions associated with transporting aggregate and construction materials to each route?

Completely ignored. Not acknowledged in any form.

IGNORED

3. Municipal Roads and Construction Traffic Q9-Q12

Alto's response (summary): *Truck volumes and routes will be defined after final alignment. Alto will work with municipalities to mitigate potential impacts.*

Q9 What is the estimated volume of construction truck movements on municipal and county roads for each route?

No estimate provided. Deferred to after alignment selection.

GENERIC

Q10 How will Ontario's seasonal road load restrictions affect construction timelines and logistics planning?

Completely ignored.

IGNORED

Q11 Who will be responsible for funding road repairs caused by construction traffic? What compensation mechanism will be in place?

Alto said they'd "work with municipalities to mitigate potential impacts" but **made no commitment on funding responsibility** and described no compensation mechanism.

GENERIC

Q12 Will Alto require or incentivise use of existing rail corridors to deliver aggregate, reducing truck movements on local roads?

Completely ignored.

IGNORED

4. Environment, Species, and Biodiversity Q13-Q17

Alto's response (summary): *Alto aims to follow leading standards and develop mitigation measures. A comprehensive federal Impact Assessment will analyze effects on ecosystems. It is too early to determine specific road impacts. Alto will work to minimize parcel-splitting.*

Q13 How will Alto estimate and quantify the impact of each route on Species at Risk under SARA? What threshold of species impact is considered acceptable?

Alto referenced the federal Impact Assessment and field studies but **described no methodology and identified no thresholds.**

GENERIC

Q14 How does Alto propose to mitigate the environmental consequences of bisecting the Frontenac Arch UNESCO Biosphere Reserve, should the Southern Route be selected?

Completely ignored. The Frontenac Arch is not mentioned anywhere in the response.

IGNORED

Q15 What is the estimated loss of carbon sequestration capacity from clearing vegetation along each route corridor?

Completely ignored.

IGNORED

Q16 Will a full quantitative analysis of dead-ended municipal roads and severed property access be conducted for both routes?

Alto said it is "too early" but **made no commitment to the quantitative analysis requested.**

GENERIC

Q17 Is each affected municipality responsible for managing dead-end road situations? Will Alto fund road diversions?

Alto said they would minimize parcel-splitting but **the core question — who pays — was not answered.**

GENERIC

5. Property, Expropriation, and Compensation Q18-Q24

Alto's response (summary): *Alignment will minimize property acquisition. Compensation based on market value excluding project-related changes. Federal Expropriation Act would apply. Temporary access will be voluntary with compensation and site restoration.*

Q18 What buffer distance will be maintained between the HSR corridor fence line and adjacent inhabited properties?

Completely ignored.

IGNORED

Q19 Will property owners whose land is adjacent to but not expropriated receive any

compensation for loss of property value, amenity, or enjoyment?

Completely ignored. This affects potentially thousands of properties along any corridor.

IGNORED

Q20 How will expropriation values be determined? Will compensation be based on pre-announcement values? Will moving expenses, legal fees, and business disruption be covered?

Alto said compensation would be based on market value "excluding any increase or decrease related to the project." However, **moving expenses, legal fees, and business disruption were not addressed.**

PARTIAL

Q21 How will people be compensated if they lose road access to a waterfront or rural property?

Completely ignored.

IGNORED

Q22 Will expropriation proceed in phases aligned with construction staging, or will all affected landowners be expropriated simultaneously?

Completely ignored.

IGNORED

Q23 What happens to expropriated properties if the HSR project is cancelled, as occurred at Mirabel Airport and Pickering Airport?

Completely ignored. A politically uncomfortable question with well-known Canadian precedents.

IGNORED

Q24 Will Alto make use of temporary occupation of private land? What compensation will be paid, and will full remediation be guaranteed?

Alto provided a substantive answer: temporary access will be voluntary, compensation will be paid, and Alto "undertakes to restore the site to a condition comparable to its original state." **This is the most specific commitment in the entire response.**

ANSWERED

6. Noise, Vibration, and Amenity Q25-Q28

Alto's response (summary): *Noise modelling will happen after route is determined. Source-control technologies will be integrated. Security is a core design priority with fences and controlled access.*

Q25 What are the predicted noise levels at various distances from the track compared to current ambient levels?

No data provided. Deferred to after route determination.

DEFERRED

Q26 What levels of vibration are anticipated during construction and operations?

No data provided. Same deferral.

Q27 What design standards will govern noise and vibration mitigation — berm heights, acoustic barriers, track isolation?

Alto listed generic construction-phase measures but **provided no design standards, no berm specifications, and no track isolation details.**

PARTIAL

Q28 How high will security fencing be? Will there be video surveillance, and how will privacy be protected?

Alto confirmed "fences and controlled access" but **gave no fence specifications.** The surveillance and privacy question was completely ignored.

PARTIAL

7. Groundwater, Wells, and Septic Systems Q29-Q30

Alto's complete response: *"It is unfortunately too early in the development phase to answer these questions. Our field studies program covers water, aquatic habitats, and overall environmental quality. The federal impact assessment will also analyze potential effects on soil, water, and aquatic environments."*

Q29 How will HSR construction and operations affect groundwater, private wells, and septic systems in the corridor? What assessment methodology will be used?

Dismissed as "too early." The field studies referenced cover **surface water and aquatic habitat, not groundwater hydrogeology or private well impacts.**

IGNORED

Q30 What minimum setback distances are planned between the rail corridor and private wells and septic beds? How will vibration transmission through limestone bedrock be assessed?

Not acknowledged at all — not even with a "too early" deferral.

IGNORED

8. Financial Accountability and Project Viability Q31-Q33

Alto's response (summary): *High-level cost assumptions are \$60-\$90 billion. Cadence (private partner) will be incentivized to reduce costs. Fares will be competitive with alternative modes. Phased project delivery will allow evaluation at each stage.*

Q31 What ticket price will be required to support the business case, and at what ridership level? Will this analysis be made public before route selection?

Alto said fares would be "competitively priced" but **provided no price range, no ridership threshold, and no commitment to pre-route-selection disclosure.**

GENERIC

Q32 How likely is the project to be delivered on budget? What contingency provisions have

been made? How do cost estimates compare to international HSR projects on a per-kilometre basis?

Alto repeated the \$60-\$90 billion figure but **provided no contingency figures and no per-kilometre comparison** to international projects.

GENERIC

Q33 **How long will construction last in each specific area? What will be the minimum notice period given to affected landowners?**

Completely ignored.

IGNORED

WHAT THIS MEANS

Why These Gaps Matter

Alto's response reveals a consultation process that **cannot deliver informed public input**.

The public is being asked to express preferences between route options without access to the geological analysis, cost comparisons, environmental assessments, noise data, or groundwater studies that would allow a meaningful evaluation.

The pattern of Alto's responses is consistent: questions seeking **specific data or commitments** are deferred or ignored, while questions that can be addressed with **general assurances** receive vague responses. The one substantively answered question (Q24, temporary land access) was the topic where Alto's response was most advantageous to its own interests.

Several questions raised well-documented international precedents (HS2 cost overruns, Mirabel/Pickering Airport expropriations) that would have required Alto to engage with uncomfortable realities. In every case, the specific precedent was not acknowledged.

A consultation that asks the public to choose between options while withholding the information needed to evaluate those options is not a genuine consultation. It is a process designed to produce the appearance of public input without the substance.

The Consultation Closes April 24, 2026

You can cite these gaps in your own submission. Ask Alto the questions they have not answered. The more submissions that raise these issues, the harder they become to ignore.

SUBMIT YOUR COMMENTS BY APRIL 24, 2026 →

ALTO HSR Citizen Research Group · altohsrcitizenresearch.ca · Public consultation closes **April 24, 2026** · [Submit at altotrain.ca](http://altotrain.ca) →
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