

**SUBMISSION TO PUBLIC CONSULTATION**

**ALTO High-Speed Rail Southern Corridor:  
Implications for Student Transportation, School  
Attendance Boundaries, and Enrolment**

*Submitted to the ALTO High-Speed Rail Public Consultation, April 24, 2026*

<b>Prepared by</b>	ALTO HSR Citizens Research Initiative
<b>Date</b>	February 2026
<b>Submitted to</b>	ALTO High-Speed Rail Public Consultation, April 2026

**KEY FINDINGS**

- Transport Canada confirmed the planned HSR network requires complete grade separation on an alignment with over 1,000 public and private crossings.
- The southern corridor passes through the primary service territories of UCDSB, CDSBEO, LDSB, HPEDSB, CEPEO, and CECCE — some of the most rural, bus-dependent school communities in Ontario. Three separate transportation consortia (STEO, Tri-Board, and CTSO) are affected.
- STEO faces an existing \$11.9M provincial funding shortfall. Any ALTO-driven route restructuring adds unbudgeted cost with no identified funding source.
- Crossing closures will trigger violations of Ontario’s maximum ride-time standards (75 min elementary / 90 min secondary) on affected routes, creating compliance and equity obligations.
- Ontario road-distance-based boundary calculations mean that crossing detours will automatically alter “nearest school” designations and transportation eligibility determinations.
- No Student Transportation Impact Assessment has been conducted. No school board has been designated as a formal stakeholder.
- No stops are planned between Peterborough and Ottawa; school boards are asked to absorb costs for a project from which their students derive no direct service.

## Section 1 — Background and Scope

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The federal ALTO project proposes a 300 km/h high-speed rail corridor through rural Eastern Ontario. The southern route option currently under study passes through the primary service territories of six school boards and three transportation consortia. English-language boards: the Upper Canada District School Board (UCDSB) and the Catholic District School Board of Eastern Ontario (CDSBEO), both served by Student Transportation of Eastern Ontario (STEO); the Limestone District School Board (LDSB), covering Frontenac and Lennox and Addington counties; and the Hastings and Prince Edward District School Board (HPEDSB), covering Hastings County — both LDSB and HPEDSB served by Tri-Board Student Transportation Services. French-language boards: the Conseil des écoles publiques de l'Est de l'Ontario (CEPEO) and the Conseil des écoles catholiques du Centre-Est (CECCE), both served by the Consortium de transport scolaire d'Ottawa (CTSO). All six boards operate schools in corridor-affected communities. The corridor requires a fully fenced, grade-separated right-of-way with no at-grade crossings. Every road intersecting it must receive a grade-separated structure or be permanently closed.

### NO STATION IN EASTERN ONTARIO

Under ALTO's current mandate, there are only three stops in Ontario: Toronto, Peterborough, and Ottawa. Kingston, Eastern Ontario's largest city, a major healthcare hub, and home to Queen's University, has no planned stop. The southern corridor therefore offers no mobility benefit to the communities it disrupts. School boards are asked to absorb costs for a project from which their students derive no direct service.

#### ALTO's CEO confirms on public record — CBC Ottawa Morning, March 25, 2026

On CBC Ottawa Morning on March 25, 2026, one day before the consultation closed, ALTO CEO Martin Imbleau confirmed the scale of crossing impacts on national radio: "We're talking a thousand kilometres and 300 community. So it's thousands of crossings that we're talking about." He confirmed absolute fencing: "Nothing can cross it. If at 330 kilometres you cross a deer, it's a huge incident... overpass and underpass will have to be strategically positioned." He also confirmed that consultation feedback was specifically addressing crossing distances for farm access, and that discussions with firefighters about emergency vehicle access were still ongoing, unresolved as the consultation closed. School bus route access was not mentioned as a category receiving equivalent attention.

*Source: CBC Ottawa Morning, March 25, 2026. [cbc.ca/listen/live-radio/1-100-ottawa-morning/clip/16205093](https://www.cbc.ca/listen/live-radio/1-100-ottawa-morning/clip/16205093)*

## Section 2 — Impact on Student Transportation Operations

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### 2.1 Route detour and ride-time impacts

In rural Eastern Ontario, north-south concession roads are typically spaced 1–2 km apart. When alternate crossings are closed, a school bus must detour to the nearest open crossing, potentially 3–8 km away. On rural routes covering 40–60 km with 15–25 stops, even a single such detour adds 6–16 km and 10–20 minutes to the one-way trip. STEO currently targets a maximum one-way ride time of 60 minutes. Ontario's new provincial standard sets a ceiling of 75 minutes for elementary and 90 minutes for secondary students by 2027–28. Routes already approaching these limits will breach them if forced to add crossing detours, creating regulatory compliance obligations for school boards. Restructuring costs such as additional vehicles, drivers, operating hours are not covered by any existing funding envelope.

## **2.2 Stop location displacement**

Bus stops cannot be located on bridge structures or inside underpasses. NHTSA guidance recommends stops be positioned at least 90 metres from any railway structure. For students living on the far side of the corridor from their school, stop locations must be moved, potentially adding significant walking distance in rural settings with no sidewalks, open roadside ditches, and vehicle speeds that already make pedestrian travel hazardous. For students in Junior Kindergarten through Grade 3, this represents a meaningful safety concern that school boards have a duty of care to address.

## **2.3 Pre-existing financial fragility across all three transportation consortia**

Student Transportation of Eastern Ontario (STEO), the consortium serving UCDSB and CDSBEO, enters this period under serious financial strain. A new provincial funding formula has created an \$11.9 million structural shortfall. The formula is perversely structured: efficiency improvements reduce route counts, which reduces funding, which reduces the benefit of the efficiency gain. STEO is simultaneously being required to increase walk distances (secondary students to 3.2 km) and maximum ride times to align with provincial standards. Any new route complexity imposed by ALTO including detours, stop relocations, and route splits, lands on a consortium that has no financial capacity to absorb it. The funding shortfall is a provincial responsibility; the infrastructure disruption is a federal one. No mechanism currently exists to bridge them. Tri-Board Student Transportation Services, which serves LDSB, HPEDSB, and the Algonquin and Lakeshore Catholic District School Board across Frontenac, Lennox and Addington, and Hastings counties, faces the same structural pressures under the revised provincial formula. The Consortium de transport scolaire d'Ottawa (CTSO), serving French-language students of CEPEO and CECCE across the corridor, similarly operates under provincial funding constraints that provide no mechanism to absorb federally-caused route restructuring costs.

## **2.4 Construction-phase operational disruption**

Throughout construction, road configurations will change frequently: temporary closures, access restrictions, and staged detours. STEO route planners will face an unusually unstable operating environment. Routes optimized in September may be invalid by January. The Ontario Ministry of Transportation requires 90-day notice for significant route changes, a standard that cannot be met if construction notifications are ad hoc. ALTO and Cadence should be required to establish a dedicated Student Transportation Construction Liaison with minimum 90-day advance notice obligations as a condition of construction permits.

# **Section 3 – Impact on School Attendance Boundaries and Enrolment**

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## **3.1 Road distance as the legal basis for boundaries**

Ontario school boards assign students and calculate transportation eligibility on the basis of road distance, the actual route a student must travel, not straight-line distance. This is embedded in Ministry of Education policy and the basis on which school boards fulfil their transportation obligations under the Education Act. When ALTO crossing closures force detours, road distances change. Every school whose catchment area crosses the corridor right-of-way will be affected. Schools that were “nearest by road” for students on the far side of the corridor may no longer be once the detour distance is calculated, automatically triggering eligibility recalculations and formal boundary reviews. Boards cannot defer this work: it is a legal requirement under the Education Act.

### **3.2 Expropriation and cross-boundary displacement**

Families expropriated from properties within or adjacent to the corridor right-of-way must relocate. In rural Eastern Ontario, affordable replacement properties may be in a different township, county, or school board catchment area entirely. For families with children in specialized programs (for example, French-language instruction under s. 23 of the Charter, Catholic education under s. 93, gifted programs, special education placements) cross-board displacement may eliminate program access. The receiving board is not automatically obligated to replicate the sending board's program offer. In rural communities with limited program duplication, this creates genuine access gaps that neither board has a mechanism to fill.

### **3.3 School viability and Pupil Accommodation Reviews**

Ontario school boards are required under the Provincial Policy for Pupil Accommodation Reviews (PPAR) to initiate a formal accommodation review when a school's enrolment falls below defined thresholds. UCDSB, CDSBEO, LDSB, HPEDSB, CEPEO, and CECCE all operate rural schools that already function below optimal enrolment levels. The ALTO corridor could reduce enrolment at schools near the right-of-way through three compounding mechanisms: expropriated families leaving the area entirely; catchment fragmentation reassigning students to other schools; and long-term demographic avoidance of corridor-adjacent communities. A Pupil Accommodation Review that results in closure has consequences extending far beyond the school board: increased bus ride times for all remaining students, loss of community infrastructure, and the kind of irreversible demographic decline that makes rural communities non-viable. None of these second-order effects are currently part of ALTO's impact assessment framework.

## Section 4 — Formal Requests to ALTO

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1	<p><b>Publish a preliminary road crossing assessment before consultation closes</b></p> <p>ALTO must publish, as part of the public consultation record, a preliminary road crossing assessment identifying: the number and type of crossings on each corridor option; which crossings are on established school bus routes; and what criteria will be used to determine whether a crossing receives a grade separation or is closed. Without this information, school boards cannot assess the project’s impacts on student transportation.</p>
2	<p><b>Designate affected school boards as formal stakeholders in the Impact Assessment</b></p> <p>UCDSB, CDSBEO, LDSB, HPEDSB, CEPEO, and CECCE must be formally designated as stakeholders in all subsequent Impact Assessment Act proceedings, alongside their respective transportation consortia (STEO, Tri-Board, and CTSO). This provides the legal standing to submit evidence on student transportation and school boundary impacts as required effects under the Act.</p>
3	<p><b>Commit to protecting all school bus route crossings from closure</b></p> <p>No road crossing on an established school bus route should be closed without formal agreement from the affected school board and transportation consortium. The U.S. FHWA has established that school bus route crossings should be protected by default in consolidation planning. ALTO must apply this standard.</p>
4	<p><b>Commission a Student Transportation Impact Assessment</b></p> <p>ALTO must commission and publicly release a Student Transportation Impact Assessment before route selection is finalised. This assessment must map all school bus routes crossing the corridor; model ride-time effects under realistic crossing-consolidation scenarios; identify regulatory compliance risks; quantify restructuring costs; and propose a funding mechanism for those costs.</p>
5	<p><b>Establish a construction-phase student transportation liaison</b></p> <p>ALTO and the Cadence consortium must establish a dedicated construction-phase liaison for student transportation, with binding obligations to provide minimum 90-day advance notice of any road access changes affecting school bus routes.</p>
6	<p><b>Establish a federal–provincial cost-sharing framework for route restructuring</b></p> <p>Route restructuring costs attributable to a federal infrastructure decision should not be borne by school boards under provincial per-pupil funding. ALTO must commit to a cost-sharing framework indemnifying STEO, Tri-Board, CTSO, and all affected boards for additional vehicles, drivers, operating costs, and boundary review administration required by crossing consolidation decisions.</p>

## Key Sources

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Transport Canada. TRAN Committee Appearance Binder — Item 15: High Frequency Rail, March 7, 2023. (1,000+ public and private crossings requiring complete grade separation.)

Lanarkist / Morrisburg Leader (February 2026). School bus funding changes could mean longer rides and fewer stops by 2027 for UCDSB, CDSBEO. (\$11.9M STEO funding shortfall.)

Student Transportation of Eastern Ontario (STEO). Transportation Consortium for UCDSB and CDSBEO. [steo.ca](http://steo.ca)

Tri-Board Student Transportation Services. Transportation Consortium for LDSB, HPEDSB, and ALCDSB (Frontenac, Lennox and Addington, Hastings counties). [triboard.on.ca](http://triboard.on.ca)

Consortium de transport scolaire d'Ottawa (CTSO). Transportation Consortium for CEPEO and CECCE. [ctso-otc.ca](http://ctso-otc.ca)

Conseil des écoles publiques de l'Est de l'Ontario (CEPEO). French-language public school board serving Frontenac, Hastings, Lanark, Leeds and Grenville, and Lennox and Addington counties. [cepeo.on.ca](http://cepeo.on.ca)

Conseil des écoles catholiques du Centre-Est (CECCE). French-language Catholic school board serving Ottawa and Kingston areas. [ecolecatholique.ca](http://ecolecatholique.ca)

Hastings and Prince Edward District School Board (HPEDSB). Serves Hastings and Prince Edward counties. [hpedsb.on.ca](http://hpedsb.on.ca)

CBC Ottawa Morning, March 25, 2026. Interview with ALTO CEO Martin Imbleau. "We're talking a thousand kilometres and 300 community. So it's thousands of crossings that we're talking about." [cbc.ca/listen/live-radio/1-100-ottawa-morning/clip/16205093](http://cbc.ca/listen/live-radio/1-100-ottawa-morning/clip/16205093)

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NHTSA (2024). Planning for Safety: School Bus Stops and Routes.

U.S. Federal Highway Administration (FHWA) (2019). Highway-Rail Grade Crossing Handbook, Third Edition.

Ghaffari Dolama, M., and Regehr, J.R. (2022). *Transport Reviews*, 42(5), 638–664.

David Cook, VP Systems Engineering and Interface, ALTO. Kingston City Council, February 17, 2026. ("limit the number of overpasses.")