

---

**ALTO HSR CITIZEN RESEARCH INITIATIVE**

Stakeholder Brief · May 2026

# The Voice ALTO Has Already Heard From

Transport Action Canada and Transport Action Ontario, the country's principal pro-rail advocacy federation, have made detailed substantive recommendations about ALTO through public letters and the ALTO consultation process itself. This brief sets out what they asked for, what the record shows ALTO has addressed, and what their voice contributes that no other source in the public record currently does.

---

*Transport Action Canada and Transport Action Ontario are a federation of citizen-led public-transportation advocacy organizations whose members have worked on intercity passenger rail for fifty years. They are not opposed to high-speed rail in principle. Their open letter on ALTO opens with "we welcome serious discussion of all options to improve passenger rail"; their March 16, 2026 consultation letter to ALTO opens with "we are very supportive of intercity passenger rail." They have engaged with the project through stakeholder roundtables, public consultations, and a written submission to ALTO's government and stakeholder relations office. Their voice in this file is doing something that no other source in the current public record does: it is the voice of an established pro-rail advocacy organization that has reviewed the project in detail, formally communicated specific recommendations to ALTO, and made its concerns publicly available.*

## Executive Summary

---

**Who.** Transport Action Canada and Transport Action Ontario are a federated citizen-led public-transportation advocacy organization with a fifty-year history of work on Canadian intercity passenger rail. They are not affiliated with the Citizen Research Initiative. They are not opposed to high-speed rail in principle. They are, in their own words, "very supportive of intercity passenger rail."

**What they did.** During the January–March 2026 ALTO consultation period, Transport Action representatives attended stakeholder roundtables and public consultation sessions in both Ontario and Quebec, monitored social and conventional media coverage, and conducted internal review. On March 16, 2026, they submitted a detailed written response to ALTO containing eighteen specific recommendations. They also published an open letter setting out what they believe the substantive questions about the project are, and what credible alternatives have been studied.

**What they asked for.** The substantive overlap between Transport Action’s eighteen consultation recommendations and the four key recommendations from Transport Committee Report 18 (September 2024) — the cost-and-business-case analysis, the release of the Joint Project Office report, the analysis of the impact on existing VIA Rail service, and the no-reduction-in-service commitment — is substantial. They are asking, in March 2026, for many of the same things that a bipartisan House committee asked for in September 2024 and that the parliamentary record shows have not been produced. They are also identifying technical alternatives to ALTO that have been studied previously and are credible.

**Why their voice matters.** The Citizen Research Initiative’s evidence base draws on the parliamentary record, the independent academic literature, the legal text of the High-Speed Rail Network Act, and journalism. Transport Action adds a category that is otherwise absent: a credible, technically literate, pro-rail advocacy organization with a long record on the file, on the public record, and asking the same substantive questions — from a position no one can reasonably characterise as anti-rail. The brief sets out what they asked for and what the record shows about whether the answers have been provided.

## Who Transport Action Is

---

Transport Action Canada describes itself as “Canada’s citizen advocacy organization for public transportation” with members who have “discussed and debated the subject over the past five decades, including of course High Speed Rail and possible alternatives.” It and its provincial affiliates (including Transport Action Ontario, jointly authoring the consultation letter examined here) are the principal national civil-society voice on Canadian intercity rail policy.

Their position on ALTO is unambiguous. The open letter opens by welcoming “serious discussion of all options to improve passenger rail.” The consultation letter opens by describing the organizations as “a knowledgeable, passenger-focussed NGO that is very supportive of intercity passenger rail.” They explicitly recognize the underlying problem ALTO is intended to address: that VIA Rail’s constrained access to CN’s Kingston Subdivision “has long been recognized as untenable, which prompted the development and launch of VIA’s High Frequency Rail proposal in 2015.” They acknowledge the limits of incremental improvement: “just improving the CN route in isolation while continuing to operate alongside freight would not come close to the quintupling of capacity and slashing of travel times possible with some kind of dedicated track.”

This is the institutional position from which they engaged with ALTO. Their recommendations are not opposition to the project; they are substantive critique of how the project is being delivered, from a body that wants intercity passenger rail in Canada to succeed.

## What They Asked For in Their Consultation Response

---

On March 16, 2026, Transport Action submitted a detailed eighteen-recommendation letter to ALTO's Government and Stakeholder Relations office. The letter is organized into seven sections: Analysis, Service, Construction, Corridor Avoidance, Compensation, Future Communications, and Southwestern Ontario. The recommendations that most directly overlap with the Citizen Research Initiative's existing documented concerns are these:

### On the business case and cost

*There is considerable skepticism from the public and stakeholders about the business case for HSR. Is investing up to \$90 billion or more over an extended timeline for HSR really the best use of taxpayer dollars? ... It is urgent that a detailed Business Case be completed as soon as possible, including preferred corridor, capital cost, detailed ridership, fares, revenue and methods of calculation. It is vital that the best possible hard numbers are available to avoid negative media and political criticism in subsequent project stages.*

Transport Action consultation letter, March 16, 2026 (Recommendation 1).

This recommendation maps directly onto Recommendation 4 of TRAN Report 18 (September 2024), which asked the Minister of Transport to require an analysis of the incremental cost between HFR and HSR within six months. As documented in the CRI brief *The Report That Vanished*, that analysis was never produced. Transport Action is asking, eighteen months later, in March 2026, for the same kind of cost-and-business-case work that Parliament's own committee asked for.

### On ridership transparency

*No details are provided on the ridership model, population assumptions, network assumptions, demand per segment, fares, cost of gasoline etc. Although the ridership assumption may be reasonable when lifted from European ridership, there is skepticism that this would be replicated in central Canada, due to lower fuel prices, absence of road tolls etc. The ridership model needs to be made public.*

Transport Action consultation letter, March 16, 2026 (Recommendation 2).

This recommendation maps directly onto Claim 3 in the CRI brief *Reading the Answer*. Transport Action notes that the government's 43-million-by-2084 figure rests on undisclosed assumptions, and specifically raises the central-Canadian fuel-price and road-toll conditions that distinguish the corridor from the European benchmarks. The Ontario provincial subsidy to personal car use —

which Transport Action quantifies at \$2.5 billion per year — is noted as a “politically tilted playing field” that any credible ridership model must account for. These are technical concerns from a body with the methodological standing to raise them.

### **On document release**

*To better inform the public about challenges and options, we urge you to release a full unredacted version of the JPO report, plus any other reports that were in the “data room” made available to the three bidders. At this time, with the tender process completed, there should be nothing in these reports that is business-confidential.*

Transport Action consultation letter, March 16, 2026 (Recommendation 3).

This is, almost word for word, the same request as Recommendation 6 of TRAN Report 18. Transport Action makes an additional point that the procurement-completion rationale for non-disclosure no longer applies: with the bidder data-room phase concluded, there is no remaining commercial confidentiality argument. The reports have still not been released. CRI’s brief *What We Know About ALTO’s Reporting and Accountability* sets out the underlying documents Transport Action is asking for, including the approximately \$18 million in CIB-subcontracted preparatory studies whose underlying analysis has not been made public.

### **On the impact on existing VIA Rail service**

*Recent media reports from Kingston regarding possible diminution of current VIA Rail services when ALTO is operational must be heeded. Since we understand that “local corridor services” will come under ALTO’s control, it is important that this be maintained or improved. Otherwise, local elected officials and residents will continue to impede ALTO’s progress. It is important that ALTO and VIA Rail jointly issue a statement promptly about plans for services at these cities.*

Transport Action consultation letter, March 16, 2026 (Recommendation 6).

This recommendation maps directly onto Recommendations 8 and 10 of TRAN Report 18 — the VIA-impact analysis and the no-service-reduction commitment, both of which have remained unanswered since the committee report was tabled. Transport Action raises the same concern in March 2026, and the Senate Transport and Communications Committee raised the same concern in February 2026 in its Second Report on Bill C-15. The question has now been raised across two parliamentary chambers and one substantial stakeholder consultation submission; it has not been substantively answered. Transport Action’s warning that “local elected officials and residents will continue to impede ALTO’s progress” should be read as a serious advisory from an organization that has watched the file for fifty years.

## Other consultation recommendations of note

Transport Action's consultation letter contains thirteen further recommendations covering downtown and shoulder station design, affordable fares, intercommunity bus access for smaller towns currently outside the rail network, emergency-management cooperation with rural fire and EMS, wildlife crossings, sufficient road and trail bridges, recognition of Ontario's Drainage Act, First Nations contingency planning for archaeological and human-remains discovery, sensitive-agricultural-use mapping (sugar bushes, vineyards, certified organic land), and compensation frameworks for intensive agricultural operations whose facilities would need to be relocated. Several of these recommendations bear directly on issues documented in the Initiative's Five Hundred Farms brief and on broader corridor-impact concerns.

## What They Said in Their Open Letter About Alternatives

---

The Transport Action open letter, published on the organization's website, examines a question CRI has not previously had answered by a technically literate pro-rail body: were credible alternatives to ALTO actually studied, and what did the studies show?

Transport Action identifies three alternatives that have been seriously considered. Each is summarised here in the organization's own technical framing.

- **Targeted CN-route improvements.** "Further investments to improve passenger and freight fluidity, like the third track between Belleville and Napanee and station improvements including additional platforms at Belleville and Coburg more than a decade ago, would make a big difference to reliability at modest cost. We believe that more such investments should be made to enable better service for Kingston and all other cities along the lakeshore route, as promised alongside HFR since 2015." Transport Action concedes that this alone "would not come close to the quintupling of capacity and slashing of travel times possible with some kind of dedicated track," but lays out a complementary package of investments at known modest cost.
- **The freight grand bargain.** "One of the alternatives that has been considered is a grand bargain with the freight railways that moves most CN freight over to the CPKC route through Perth — which would require double-tracking, crossing closures, fencing, and other improvements to support the additional traffic. The existing CN route could then be upgraded to support more passenger services at up to 170 km/h, with travel times of around 4 hours between Toronto and Montreal or Ottawa and more frequent service between Ottawa and Montreal at current travel times." This is a version of the High Performance Rail framework substantially as the Initiative has documented it in CRI materials. It is independently advocated by Transport Action as a technically credible option.
- **HFR on the original Havelock alignment.** "A dedicated track that takes a more direct route between Toronto and Ottawa, with the advantage of reconnecting Peterborough to the railway network, was VIA Rail's preferred option, while also preserving service on the

existing route through Kingston. The HFR proposal would have done so using the little-used CP freight tracks and former railbed between Havelock and Perth, probably with detours requiring a new alignment around the towns of Tweed and Sharbot Lake.” This is the project that the federal government created and funded the Joint Project Office to study in 2017, the project the committee studied in 2023–2024, and the project the federal government redesignated in late 2024.

## On HSR along the lakeshore

Of independent technical interest is Transport Action’s observation about why earlier HSR studies along the Lake Ontario lakeshore did not proceed:

*High Speed Rail following a lakeshore from Toronto through Kingston has also been studied before, more than once, by both the federal and provincial governments, without proceeding. For safety reasons, and to achieve 7km+ minimum radii for higher speeds, such a dedicated track could not be placed too close to the existing alignment nor right alongside Highway 401. It would thus require significant expropriation, and the number of homes and businesses close to CN’s tracks and the 401 has only grown since the last such study in 2011. The chances are that communities like Port Hope and Trenton would be bypassed entirely, and route from Kingston to Ottawa would also then also go through the same sensitive Frontenac Arch region and many of the communities expressing most concern about Alto’s southern study corridor.*

Transport Action open letter on ALTO HSR.

This is the route-geometry argument set out by a pro-rail body with the technical standing to make it. It is, in substance, the same observation about HSR’s 7-km curve-radius requirement that CRI’s engineering research has documented, presented here as a published critique by an established advocacy organization.

## What Their Voice Contributes

---

The Citizen Research Initiative’s briefs to date have drawn on four categories of source. Each has its own evidentiary weight; each has its own limitations.

- **The parliamentary record.** Order Paper questions, Transport Committee reports, Senate committee testimony, the legal text of the High-Speed Rail Network Act. Authoritative but procedurally bounded.
- **Independent academic studies.** The McGill Transportation Research and Munk School Global Economic Policy Lab analyses. Methodologically rigorous but bounded by what their funding and scope of study allow them to address.

- **Journalism.** The Canadian Press and Globe and Mail reporting on the Cossette marketing contract, CBC News on agricultural impacts, the Globe and Mail on Phil Mount's NFU response. Documentary but episodic.
- **Affected stakeholders.** The Ontario Federation of Agriculture, l'Union des producteurs agricoles, the Canadian Federation of Agriculture, the Beef Farmers of Ontario, and the National Farmers Union, whose demands the CRI brief Five Hundred Farms documents. Authentic to the affected communities but advocating for their members' specific interests.

Transport Action contributes a fifth category that has been substantively absent from CRI's evidence base until now: a credible, technically literate, pro-rail advocacy organization with no opposition to the project in principle, no economic interest in its outcome, and a fifty-year record of engagement with Canadian intercity passenger rail policy. The questions they raise overlap substantially with those raised in the parliamentary record, the academic studies, the journalism, and the stakeholder demands. They raise them in their own institutional voice, on the public record, having engaged directly with ALTO through ALTO's own consultation process.

This matters in two specific ways. First, it forecloses the response that the questions about ALTO's cost, ridership, document release, and VIA-service impact are coming only from project-affected landowners or from anti-rail critics. They are coming from the country's principal pro-rail civil-society voice, in March 2026, on the public record, having formally engaged with the project. Second, it puts the alternatives that have been considered — including the HPR framework the Initiative has been documenting — into the technical vocabulary of an organization that has the standing to describe them. Transport Action is not opposed to HSR. They are concerned about how this HSR project is being delivered, and they have proposed credible alternatives that should be on the table.

## Why Their Recommendations Remain Live

---

As of May 2026, the parliamentary record shows that:

- **The cost analysis** that Transport Action's March 2026 letter asked for, and that TRAN Report 18 Recommendation 4 had asked for in September 2024, has not been produced. The \$60–90 billion AACE Class 5 figure in Q-923 stands without it.
- **The Joint Project Office report** that Transport Action's March 2026 letter asked to be released, and that TRAN Report 18 Recommendation 6 had asked to be released in September 2024, has not been released. Transport Action's additional point that the procurement-completion rationale for non-disclosure no longer applies has not been addressed.
- **The VIA-impact analysis** that Transport Action's March 2026 letter asked for, that the Senate TRCM raised concerns about in February 2026, and that TRAN Report 18 Recommendations 8 and 10 had asked for in September 2024, has not been produced. ALTO's published material continues to refer to "optimization" of existing VIA services

without a binding commitment that current VIA-served communities will retain service at present levels.

- **The ridership-model assumptions** that Transport Action’s March 2026 letter asked be made public have not been published. The government’s 43-million-by-2084 figure in Q-923 stands without disclosed methodology behind it.

None of these are partisan demands. None of them is hostile to the project. All of them are recommendations from an established pro-rail advocacy organization, made through ALTO’s own consultation process, asking the same things that Parliament’s own committee was asking. Their continued non-fulfilment is procedural, not substantive — and procedurally, as the brief *The Report That Vanished* sets out in detail, the questions remain available to be revived by parliamentary or stakeholder action.

## Where Things Stand

---

Transport Action Canada and Transport Action Ontario have engaged with ALTO substantively, in writing, through both public commentary and formal consultation channels. They have raised specific technical, financial, and service-continuity concerns from a position of acknowledged expertise and acknowledged support for the underlying policy objective of better intercity passenger rail in Canada. Their concerns overlap substantially with the parliamentary, academic, and journalistic record. They have, where credible alternatives exist, identified them by name.

This brief is offered as a reference document for federal decision-makers, parliamentarians, journalists, and constituents tracking the file. It is intended to make clear, in plain comparative form, what an established pro-rail advocacy organization has asked of ALTO, what the public record shows ALTO has so far addressed, and what their voice contributes that the rest of CRI’s evidence base does not.

## Sources

---

Transport Action Canada and Transport Action Ontario, Comments arising from ALTO HSR Stakeholder Roundtable and Public Consultation Sessions (letter to Peter Paz, Government and Stakeholder Relations, ALTO), March 16, 2026. Signed Terry Johnson (President, Transport Action Canada) and Peter Miasek (President, Transport Action Ontario). Online at [ontario.transportaction.ca/comments-from-alto-consultation-sessions/](https://ontario.transportaction.ca/comments-from-alto-consultation-sessions/).

Transport Action Canada, Why did the government chose Alto? (open letter on ALTO HSR route options in eastern Ontario), 2026. Online at [ontario.transportaction.ca/open-letter-on-alto-hsr-route-options-in-eastern-ontario/](https://ontario.transportaction.ca/open-letter-on-alto-hsr-route-options-in-eastern-ontario/).

House of Commons Standing Committee on Transport, Infrastructure and Communities. Issues and Opportunities: High Frequency Rail in the Toronto to Quebec City Corridor. 18th Report, 44th Parliament, 1st Session. Tabled September 2024.

Order Paper Question Q-923, 45th Parliament, 1st session. Asked by Philip Lawrence (MP for Northumberland–Clarke), March 5, 2026; answered April 22, 2026.

ALTO HSR Citizen Research Initiative companion briefs: Reading the Answer (May 2026), Reading the Footnote (May 2026), The Report That Vanished (May 2026), What We Know About ALTO's Reporting and Accountability (May 2026), and Five Hundred Farms (May 2026).

ALTO HSR Citizen Research Initiative — [citizenresearch.ca](http://citizenresearch.ca) — May 2026