

# Heard, Not Counted

How Alto’s What We Heard report is built to record concern without consequence

## THE ARGUMENT

*The report is accountability-shaped but accountability-proof. Its design maximizes the visible evidence that consultation happened while removing every element that would let anyone test what it produced. It is built so that hearing is decoupled from consequence, and once that is the organizing principle, the individual flaws stop looking like sloppiness and start looking like function.*

## 1 The smoking gun: asymmetric precision

This is the sharpest observation because it is not interpretive — it is on the page. Alto reports its inputs to six significant figures and its outputs with no number at all.

HOW THE INPUTS ARE REPORTED	HOW THE OUTPUTS ARE REPORTED
324,026 unique online visits	Themes raised: no count given
24,142 questionnaires completed	Concerns by category: no count given
19,903 interactive-map pins	Sentiment split: not reported
14,503 media mentions; 1.8% click-through	Ranking of issues: “all significant”

The qualitative colouring is asymmetric in the same breath. In adjacent sentences of the executive summary, support gets intensifiers and active voice: nation-building “viewed positively, alongside strong enthusiasm,” supporters who “expressed a desire” to move forward. Opposition gets neutral process-verbs and passive voice: land-acquisition opposition “was voiced,” concerns “raised... on many occasions.” Both are unquantified; one is painted warm and active, the other cool and passive. That asymmetry, in a single paragraph, is the legitimization machine in miniature.

## 2 A report that cannot be wrong

The report states its themes were produced by “Artificial intelligence tools... semantic clustering, multi-label classification,” which also “were used to support report writing.” Combine that with the absence of magnitude, the absence of attribution, and the explicit instruction that the themes “are not presented in a specific order and they are all significant,” and the report becomes structurally unfalsifiable.

There is no figure to check against the inputs, no ranking to dispute, no claim that could be shown false. “All significant” is not a finding; it is a flattening — it pre-emptively denies that overwhelming, concentrated

opposition would look any different from a scatter of mild concerns. A report that cannot be wrong is not a record; it is a position statement wearing a record's clothes.

### 3 The frame was set before the room opened

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The corridor that was consulted on was derived first from technical and financial criteria ("the straightest possible route," "minimizing construction costs") and the three 2025 RFP submittals, and then presented for feedback. The exercise is explicitly "corridor refinement": consultation on the width of a band already drawn from cost-minimization, not on whether or where. And the seven "project outcomes" — increase ridership, minimize taxpayer cost, contribute to reconciliation — are stated as fixed premises the consultation serves, never as propositions it could test.

The consultation's frame excludes the project's own justification. A participant could object to a curve; they could not put on the record that the stated outcomes might be better met by upgrading existing lines, the question the public itself kept raising as "improve VIA first." The frame did the foreclosing; the consultation only refined inside it.

### 4 Consent invoked, consent disclaimed

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Both parts of the report released today ("What We Heard Corridor Study Area" and "Indigenous Consultation") invoke "Free, Prior, and Informed Consent". The word doing the work is consent, yet the report never claims consent was obtained. Instead, it says Alto consults "with the aim of securing" it, then states flatly the process "is not a rights determination process." It wears FPIC as a credential while disclaiming the thing FPIC names.

- **The funnel:** of 40 Indigenous communities contacted, 29 held meetings and 12 made further submissions, a thinning base for a report it calls "validated."
- **The enclosure:** corridor maps were shared only with communities that had signed a collaboration or non-disclosure agreement. Consultation conducted under NDA is a contradiction in terms for a public, rights-bearing process: you could only see what you were consulted on by signing away the ability to discuss it.

### 5 Responsiveness, staged

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The report, which documents Kingston-area demand, was released the same day, at Queen's University, alongside the Minister's direction to study a southern route through Kingston. The sequence manufactures a narrative of listening and responding. But the response is a direction to study, hedged twice ("potential," "subject to technical feasibility"), and the actual consultation on that segment is pushed to 2027. The report stages responsiveness in the present while deferring the substance past the next news cycle.

## 6 What this brief does not claim

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- **Not that Alto ignored concerns.** It did not — the south-corridor section names farmland, the Frontenac Arch, karst and groundwater specifically. The defensible claim is narrower and deadlier: Alto records concerns in a form that cannot be acted on or audited.
- **Not that the comment counts are bad faith.** The public-facing range (“nearly 20,000” vs “nearly 45,000”) is two framings and partly a window/dedup artifact. The fair point is rhetorical, not arithmetic: Alto’s own site reaches for the smaller number.
- **Not that using AI is the flaw.** The flaw is that the taxonomy is undisclosed and the outputs unquantified. Aim at the opacity, not the method.
- **Not that this was a representative poll.** Neither report claims it was. The engagement platform measures the intensity of the concerned — which is exactly why the absence of any sentiment or geographic breakdown is the tell.

*Alto published a 134-page account of a consultation that is precise about how many people it reached and silent about what they said — and that silence is the product, not an omission.*

## Sources

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1. Alto, Public Consultation — What We Heard Report, Corridor Study Area (134 pp), June 2026. [altotrain.ca](https://altotrain.ca)
2. Alto, Indigenous Consultation — What We Heard Report, Corridor Study Area (24 pp), June 2026. [altotrain.ca](https://altotrain.ca)
3. Transport Canada, news release on the What We Heard report and Kingston as a potential stop, June 22, 2026. [canada.ca](https://canada.ca)

*Quoted phrases are taken directly from the reports named above. The Alto HSR Citizen Research Initiative is an independent, non-partisan research project examining the proposed corridor through Eastern Ontario.*