November 27, 2025

RESPONSES PREPARED BY THE APPLICANT
TO COMMENTS SUBMITTED IN THE CONTEXT OF THE CTA PUBLIC CONSULTATION
ON THE APPLICATION FOR AUTHORIZATION OF THE LAC-MÉGANTIC RAIL BYPASS PROJECT

NOVEMBER 12 TO DECEMBER 23, 2025

In the context of the Canadian Transportation Agency's ("**CTA**") public consultation on the application for authorization of the Lac-Mégantic Rail Bypass Project (the "**Project**"), Canadian Pacific Railway Company, doing business as Canadian Pacific Kansas City ("**CPKC**"), as the operating railway company and on behalf of Central Maine and Quebec Canada Railway Inc. (the "**Applicant**"), submits the following responses to questions and comments received between November 21 and November 26, 2025.

To promote clarity and avoid duplication, the Applicant has consolidated its responses by thematic category. When appropriate, a single response has been prepared to address multiple questions or comments that fall within the same category.

General Comments
The following is in response to comments submitted by Anne Gauvin, Alexandre Marquis, Maryse Hallé, Rémi Kirouac, Gaston Quirion, Liaise Blais (Quirion), Maurice Gareau, Louyse Louis-Seize, Yves Louis-Seize, Claude Roy, Anne-Julie Hallée, Germain Roy and Serge Liard. Several of the communications submitted between the response dates listed above did not pose any questions and were in the form of comments in favour or opposed to the Lac-Mégantic Bypass project for various reasons. We wish to thank the individuals who took the time to review the Application and formulate these comments, which are important to be raised before the CTA in this consultation process.
Safety of Design and Train Speed
The following is in response to the comment submitted Robert Bellefleur. The proposed bypass has been designed by professional engineers in accordance with accepted engineering principals and standards (confirmed by the placement of the professional stamps on the drawings included Appendix 2-3 – Drawing Package). As described in Appendix 2-2 – Bypass Design Criteria, the engineering design of the bypass conforms to the requirements set by the Transport Canada Rules Respecting Track Safety for Class 3 Track, the standards set by the American Railway Engineering and Maintenance of Way Association (AREMA) in the 2024 version of the Manual of Railway Engineering as well as other published engineering standards. The Transport Canada Rules Respecting Track Safety further specify that the maximum operating speed on Class 3 Track is 40 mph for freight trains (unless limited by other factors such as curvature).
Inspection of Track and Structures Once in Operation

The following is in response to the comment submitted Robert Bellefleur.

The Transport Canada Rules Respecting Track Safety specify minimum inspecting and testing intervals for operating railway track (based on annual tonnage). As Class 3 Track, once in service, the proposed bypass will:

Inspection / Test	Less than 5 MGT	5 - 15 MGT	Greater than 15 MGT
Main Track Visual Inspection	Weekly	Twice Weekly	Twice Weekly
Turnout Inspection	Monthly	Monthly	Monthly
Electronic Geometry Inspection	Annually	Annually	Twice Annually
Rail Flaw Inspection	Annually	Annually	Annually

Groundwater and Drinking Water

The following is in response to comments submitted by Francis Paré.

The Groundwater and Potable Water Well Monitoring Plan (GPWWMP) is included as Appendix 5-7. Neither the GPWWMP nor the Hydrogeology Report (Appendix 2-7) state how long it will take the ground water table to stabilize. The GPWWMP, which Transport Canada has committed to implement, specifies that the monitoring program will continue until a professional Hydrogeologist has determined that the groundwater has stabilized (taking into account natural and regional variation and trends).

The specific protocols and intervention thresholds for well which experience a decrease in water level are detailed in Section 6 of the GPWWMP.

As highlighted in the communications between Transport Canada and CPKC in the summer of 2025 (and included as Appendix 3-2 – Communications on Potential Additional Studies), a regional groundwater study has not been completed as part of this proposed project. No measures have been specifically identified as part of this project to mitigate groundwater drawdown at a regional scale. Transport Canada has committed to implement the Groundwater and Potable Water Well Monitoring Plan (Appendix 5-7) which will monitor groundwater in the region through measurements taken at private wells and installed piezometers."

Route Selection

The following is in response to comments submitted by Francis Paré.

CPKC was not involved in the route selection studies and additional materials (beyond the materials included in Appendix 1-4 – Route Selection Studies) do not form part of the Application. Additional information on which factors were prioritized over others and why certain routes didn't advance may be available on the BAPE project website (Projet de réalisation d'une voie ferroviaire contournant le centre-ville de Lac-Mégantic).

Risk of Contamination
The following is in response to comments submitted by Francis Paré and Rémi Tremblay. As part of the Groundwater and Potable Water Well Monitoring Program (GPWWMP), included as Appendix 5-7, which Transport Canada has committed to implement, the list of water quality parameters which will be monitored is detailed in Table XV (Section 5.3.3.3 of the GPWWMP). Once the construction of the bypass is complete, railway operations will be transferred to the bypass, which will be operated and managed as part of CPKC's tri-national network, in accordance with all applicable railway, environmental and safety regulations, which do not require routine soil sampling or testing for contamination on the operating RoW. Respecting the private lands outside of the RoW, there is no ongoing soil sampling or testing for soil contamination proposed.
Environmental Risks and Wildlife Habitats
The following is in response to comments submitted by Francis Paré. As described in Appendix 5-8 – Wetlands Monitoring Plan (WMP), the wetland assessment will include both quantitative (e.g., water level) and qualitative (e.g. site description and vegetation species composition) indicators. The WMP does not include monitoring the area of wetlands regionally. Should the construction activities have an impact on wetlands adjacent to the future right-of-way located on private properties that are monitored as part of this project, Transport Canada will be able to document it, and propose adapted corrective measures to landowners impacted. Based on the analysis completed in the Environmental Effects Evaluation (Appendix 3-1), due to uncertainty, it cannot be determined whether or not forest areas will be impacted by groundwater drawdown. As such, no mitigations or compensation has been proposed specifically related to forest loss due to groundwater drawdown. No compensation is planned for the loss of forests outside the RoW except for a 5-m-wide strip along either side of the RoW (or 12.5-m-wide strip in maple tree stands). The compensation for this strip is included as part of Transport Canada's forest compensation program, described in Appendix 5-9 – Forest Compensation Monitoring Program.
Noise and Vibration
The following is in response to comments submitted by Francis Paré. With respect to the regulation of railway noise in Canada, there are no specific maximum residual noise levels or official standards. As described in their "Guidelines for the Resolution of Complaints Concerning Railway Noise and Vibration" (available online at https://otc-cta.gc.ca/eng/publication/guidelines-resolution-complaints-over-railway-noise-and-vibration), the CTA evaluates what is reasonable noise while balancing the operational requirements of the railway company and the specifics of the locality. For this project, as described in Appendix 3-6 – Noise and Vibration Assessment, CPKC considered Health Canada's 2017 *Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise* and applied a criterion of a modelled increase in %HA no greater than 6.5% (which is the Health Canada recommended threshold for when mitigation should be applied).

Regulated Goods and Safety
The following is in response to comments submitted by Francis Paré. CPKC, under the *Canada Transportation Act*, is required to haul any railcar that a customer properly offers for transport (also known as common carrier obligations). In general, the number of railcars offered for transport follows the broader economy which is expected to grow over time. Once the bypass is placed into service, it will be operated as part of CPKC's tri-national network. More information on how CPKC helps keep communities safe, including copies of CPKC's Community Emergency Planning Guide and CPKC's Integrated Contingency Emergency Preparedness and Response Plan, are available online at https://www.cpkcr.com/en/safety/hazmat-safety.
Expropriation
The following is in response to comments submitted by Francis Paré. As more fulsomely described in Transport Canada's Land Acquisition Report (included as Appendix 1-5), land was required from 42 different landowners (including the City of Lac Megantic). Transport Canada reached a negotiated agreement for the purchase of the required land with the City of Lac Megantic as well as one private landowner. The other land required for the project was obtained by expropriation. The compensation paid to individual landowners is private information. In accordance with the *Expropriation Act*, an additional 10% compensation was paid to the owners for early possession of the land.