

**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, 2025 TO JANUARY 30, 2026**

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 the Municipality of Nante’s memorandum received on December 4, 2025.

To promote clarity and avoid duplication, the Applicant has consolidated its responses by thematic category.

**Impacts on Wetlands and Forests**

As described in Appendix 3-1 – Environmental Effects Evaluation (“**EEE**”), due to the level of uncertainty surrounding the extent and magnitude of the potential groundwater drawdown, it is not possible to determine the significance of the impacts on 1) the reduction in streamflow due to lowering of the groundwater table; 2) the loss of wetlands and forests due to hydrogeologic impacts; and, 3) the modification or loss of wildlife habitat due to hydrogeological impacts.

As further indicated in the EEE, mitigation measures focus on minimizing the project footprint and construction impacts. As indicated in Appendix 5-8 – Wetlands Monitoring Plan, and in Appendix 5-9 – Forest Compensation Monitoring Plan, Transport Canada has committed to propose and implement corrective measures to private landowners should there be impacts observed during the implementation of the monitoring program, or if there is further loss of forest outside the strip that is currently planned (a 5-m-wide strip along either side of the RoW (or 12.5-m-wide strip in maple tree stands).”

Should there be permanent loss of wetlands observed outside the ROW, Transport Canada has committed to providing a financial contribution to the provincial wetland habitat compensation program. Mitigation measures to address potential loss of ecosystem functions provided by wetlands at a local or regional level, modification or loss of wildlife habitat due to hydrogeological impacts, or reduction in streamflow due to the potential lowering of the groundwater table are not part of the bypass project.

As described in Appendix 5-8 – Wetlands Monitoring Plan, if the permanent loss of wetlands is greater than 35ha, Transport Canada has committed to make additional contributions to the Provincial wetland habitat compensation program to offset the habitat loss.

**Risk of Contamination of Groundwater**

As further developed in Appendix 3-1 – Environmental Effects Evaluation (“**EEE**”), the risk of contamination to the groundwater during both the construction phase (Section 6.3.3 EEE) and operation phase (Section 6.4.3 EEE) of the proposed bypass, is addressed through the implementation of mitigation measures (1) during construction (including amongst others, daily equipment inspections, reporting and clean-up of spills, and the use of clean materials in construction) and (2) during operations (including, amongst others, maintaining equipment in good working order and spill reporting and clean-up). As such, the residual effects will be insignificant.

**Noise and Vibration**

Appendix 3-6 – Noise and Vibration Assessment, Appendix 5-1 – Construction Noise Monitoring Plan and Appendix 5-2 Construction Vibration Monitoring and Building Survey Plan demonstrate there were a few residences that would see noise increases (without mitigation) above accepted thresholds. Anti-noise barriers comprised of anti-noise walls and earth berms will be constructed at specific locations to keep the noise increase experienced at these properties within accepted limits.

Tables 6-8 and 6-20 of Appendix 3-1 – Environmental Effects Evaluation provide a noise and vibration effect assessment of the construction and operation phases of the project, and present recommended mitigation measures for each potential effect as well as the classification and significance rating of the residual effect. The implementation of recommended mitigation measures for the construction and operation phases of the Project is expected to render the residual effects on noise and vibration insignificant.

**Economic Impact of the Project**

As described in Section 6.3.8 of Appendix 3-1 – Environmental Effects Evaluation (“**EEE**”), the proposed project will have a net positive impact economically during the construction phase. This is due to the creation of local jobs and the purchase of goods and services locally. During the operating phase of the project, there is expected to be no change (neither positive nor negative) economically as the railroad operation will not be materially different from those which currently take place. In the downtown area of Lac Megantic, the EEE found there would be a positive economic impact during the operating phase of the project due to the predicted downtown redevelopment.

**Financial Impacts to Residents and the Municipality**

The question of property value (and financial impacts) was raised during Transport Canada’s Fall 2024 public consultation, and Transport Canada responded as follows, as detailed in Section C-7 of Appendix 4-2 – Stakeholder Engagement Report:

If a property owner believes that damage resulting in a permanent depreciation of the value of their residence is directly related to the construction or operation of the bypass, despite the mitigation measures implemented by Transport Canada, it would be the owner’s responsibility to provide evidence demonstrating the impacts of the bypass on their residence to Transport Canada. In the event that these losses are deemed valid, Transport Canada would engage in dialogue with the owner to analyze the situation, precisely identify the source of the issues raised, and, if necessary, determine the measures required to address them.

If a homeowner believes that permanent depreciation of their property value is directly linked to the construction or operation of the bypass, despite mitigation measures by Transport Canada, they must provide evidence of the impact. If these claims are deemed valid, Transport Canada will engage with the homeowner to assess the situation, identify the source of the issues, and determine appropriate corrective measures.

Given the unique nature of this project, which is a federal initiative and a funding priority of the Government of Canada, and given CPKC is only serving as the railway applicant for the purpose of this project, this is a commitment of Transport Canada that is not related to the Applicant.

**Rail Safety**

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).

**Road Safety and Emergency Response**

As more fully described in Section 6.4.9 of Appendix 3-1 – Environmental Effects Evaluation (“**EEE**”), there is projected to be an overall positive impact on traffic in the Lac Megantic Bypass project area. The removal of the railway from the downtown will improve the fluidity of traffic in this sector and there will be an increase in road safety due to a net reduction of 10 public grade crossings as well as a net reduction of 3 private grade crossings.

Section 3.2.3 and Table 3-2 of Appendix 3-3 – Traffic Impact Study further detail the impact of the project on accessibility of emergency services in the study area and analyze travel times from/to emergency services before and after the implementation of the new track. Section 2.5.5 and Table 6-15 of the EEE provides that emergency services will be constantly informed of the traffic management plan, where and when roads are closed, and that detours and bypass lanes constructed will be wide enough to accommodate emergency vehicles.