January 7, 2026

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 Frontenac's memorandum received on December 19, 2025.

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

Part 1: Questionable Elements of the CPKC Document

In this section of the Municipality of Frontenac's brief, certain issues with respect to the Appendix 3-1 – Environmental Effects Evaluation ("**EEE**") related to uncertainties regarding the potential impacts of the drawdown on groundwater were raised.

In this regard, as identified in EEE, the residual effects during the construction phase of the project for waterways, groundwater, and sensitive ecosystems could range from insignificant to significant (with the consequences of the residual effects ranging from moderate to very high). This range is due to the uncertainty with respect to groundwater and the inability to directly mitigate a drawdown in regional groundwater, as further detailed in Appendix 3-2. The residual effects on private wells have been assessed to be insignificant with the implementation of mitigation measures. If impacts on private wells do materialize, Transport Canada has committed to implement the measures described in section 7.1 of the Groundwater and Potable Water Well Monitoring Plan (Appendix 5-7), as follows:

(1) Emergency drinking water supply by means of bottled potable water and potable water available through a temporary outdoor tank, while a permanent solution is being put in place;

(2) Deepening an existing well or construction of a new well; and

(3) Connecting to a municipal aqueduct network when previous options have been considered and tested or deemed not applicable.

According to the experts consulted by Transport Canada, such as the Geological Survey of Canada (see Appendix 3-2 – Communications on Potential Additional Studies), the proposed approach based on existing studies, continuous monitoring, and adaptive response is considered a sound risk

management strategy as it relates to the potable water wells, that is proportionate and consistent with recognized best practices in the field of

hydrogeology. These monitoring plans include the Groundwater and Potable Water Well Monitoring Plan (Appendix 5-7), the Wetlands Monitoring Plan (Appendix 5-8), and the Forest Compensation Monitoring Plan (Appendix 5-9)) . As detailed in the EEE and the Wetlands Monitoring Plan (Appendix 5-8), 33ha is the known area of wetlands which will be physically impacted by the project (e.g., wetlands within the right-of-way which will be infilled during the construction of the rail grade). This can be distinguished from the uncertainties regarding project impacts at a regional level. With respect to the wetlands within the right-of-way, Transport Canada will provide financial compensation for the loss of these wetlands to the provincial fund upon project approval and the start of construction. If, through the implementation of the Wetlands Monitoring Plan, additional impacts to wetlands are discovered, Transport Canada will make addition financial contributions to the fund (proportionate to the area of impact). The Construction Environmental Management Plan ("**CEMP**") is included as Appendix 5-3 and identifies the minimum environmental standards which will be adhered to throughout the construction of the project as well as the required environmental monitoring which will be undertaken. As detailed in Section 1.4 on the CEMP, the contractor selected to construct the project will be responsible to produce the Environmental Protection Plan ("**EPP**"). The EPP, which must be approved by CPKC prior to the start of construction, will detail how the contractor will meet the requirements of the CEMP. Further, Appendix 5-4 – Surface Water Monitoring Plan details how water quality (including turbidity) and channel stability will be monitored during construction. This plan includes relevant thresholds as well as mitigations which will be implemented in the event the thresholds are exceeded.
Part 2: Duty to Protect the Public and Public Health
We thank the Municipality of Frontenac for sharing their perspective on project risk management.