

**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 questions and comments received between January 2 and 12, 2026.

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
<p>The following is in response to comments submitted by Robert Giguère, Raymond Gauthier, Claude Couture, Anne-Josée Paradis, Sébastien Roy & Sophie Bilodeau, Sylvia Audet and Francine Moisan.</p> <p>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.</p>
Quality of Existing Tracks
<p>The following is in response to comments submitted by Viola Duquette, Sylvain Robert, Marilyse Couture, Diane Laplante, and Ronaldo Robert.</p> <p>Since CPKC’s purchase of Central Maine & Quebec Railway in 2019, over \$90 Million has been invested in the infrastructure to raise it to Class 3 Track Standards (as defined in Transports Canada’s <i>Rules Respecting Track Safety</i>). This has included the installation of new ties and rail, upgrades to the ballast and repair and replacement of watercourse crossings.</p>
Groundwater and Potable Water
<p>The following is in response to comments submitted by Sylvain Robert, Véronique Morin, Marilyse Couture, Chantale Roy, and Marc Lemieux.</p>

To mitigate uncertainty surrounding the potential impacts to the regional groundwater and the risk to drinking water, Transport Canada has committed to implement the Groundwater and Potable Water Well Monitoring Plan (“**GPWWMP**”) (see Appendix 5-7).

As part of the GPWWMP, potable water wells located within the assessment area will be monitored during the construction period, the post-construction period, and until the water table stabilizes.

Transport Canada has made a commitment to ensure a constant and safe supply of drinking water for residents (mitigation measures TC-SG-08 to TC-SG-10). Section 7.1 of the GPWWMP details the steps TC will take in the event of a shortage of potable water 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.

Risk of Contamination

The following is in response to comments submitted by Sylvain Robert, Véronique Morin, Marilyse Couture, Lili Lemieux, Chantale Roy, Marc Lemieux, and Diane Laplante.

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.

Wetlands

The following is in response to comments submitted by Sylvain Robert, Véronique Morin, Lise Grenier, Diane Laplante and Lisette Doyon.

Transport Canada has developed a comprehensive Wetlands Monitoring Plan (see Appendix 5-8) to track and manage potential impacts on wetlands adjacent to the bypass right-of-way. This plan sets clear thresholds and adaptive measures to ensure timely corrective action if changes are observed. Data collected before and during construction will be analyzed and reported publicly, and should permanent loss of wetlands outside the right-of-way occur, Transport Canada has committed financial contributions to the provincial wetland habitat compensation program, with additional contributions if losses exceed 35 hectares.

As described in Appendix 3-1 – Environmental Effects Evaluation (“**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).

Wildlife and Habitat

The following is in response to comments submitted by Véronique Morin.

As described in Section 6.3.7 of Appendix 3-1 – Environmental Effects Evaluation (“**EEE**”), during the construction phase of the project, with the application of mitigation measures, the residual effects on birds, mammals, amphibians and reptiles are expected to be insignificant with the consequences of the residual effects ranging from very low to moderate. The EEE considered factors such as direct loss of habitat availability, disturbance to wildlife, loss of habitat connectivity, change in survival and reproduction and change to species of importance to First Nations.

Tables 6-13 and 6-25 of the EEE provide the effect assessment of the construction and operation phases of the project on birds, mammals, amphibians, and reptiles and present the recommended mitigation measures for each potential effect as well as the classification and significance rating of the residual effect. Recommended mitigation measures include, among others, conducting clearing activities outside the nesting and rearing period for forest bird broods, avoiding construction works likely to alter the nests of field birds during this same nesting period in the region, as well as capturing stream salamanders that could be affected by the installation of culverts and releasing them downstream of the disturbed area.

The exception to this is modification or loss of habitat due to hydrogeological impacts, which ranges from insignificant to significant and the consequences of the residual effect range from moderate to very high. As stated in the EEE, “there is a potential that construction of the Project will cause groundwater level drawdowns that could extend beyond the RoW of the Project. The change in water availability could cause a loss of wetlands or forests outside the RoW and changes in flora species composition could also occur to wildlife habitats due to hydrogeological impacts, reducing the amount or modifying the quality of habitat that is available for wildlife. Monitoring measures of wetlands have been planned by TC to follow the actual effects outside the RoW, and as a worst-case scenario, after implementation of adapted corrective measures where applicable, compensation through financial contribution to the provincial program will be an option considered by TC should there be any permanent losses of wetland outside the RoW. 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 narrow strip is included as part of TC’s forest compensation program, described in Appendix 5-9 – Forest Compensation Monitoring Plan.

No measures have been specifically identified as part of this project to mitigate groundwater drawdown at a regional scale, but Transport Canada has committed to implement robust monitoring plans to monitor wetlands, surface water bodies, and forest that are adjacent to the future right-of-way to document potential changes, and propose corrective measures on a case-by-case basis.

Risk of Flooding

The following is in response to comments submitted by Véronique Morin.

<p>The proposed Lac Megantic Bypass will not lead to an increase in flooding along the Chaudière River. During an average flood, approximately 9.9 million cubic meters of water discharge through the river each day (see Appendix 2-8 – Hydraulic Study); the discharge from the project area is modelled to be 4,442 cubic meters per day (see Appendix 2-7 Hydrogeology Report), which represents 0.045% of the daily flow of the river.</p>
<p>Water Management</p>
<p>The following is in response to comments submitted by Lise Grenier.</p> <p>As can be seen on the Plan and Profile drawings (as well as the Cross-Section drawings) included in Appendix 2-2, any water which enters the new right-of-way will be collected in ditches which run parallel to the tracks and directed to receiving waterbodies. These receiving waterbodies include the Chaudière River and the tributary streams which flow into the river and Lac Megantic.</p>
<p>Transport Canada Regulations</p>
<p>The following is in response to comments submitted by Viola Duquette, Marilyse Couture, and Lili Lemieux.</p> <p>The railway sector in Canada is a highly regulated industry. Specific to leaving equipment unattended, this is governed by Section 112 of Transport Canada’s Canadian Rail Operating Rules. Specific to speed limits for trains carrying certain regulated commodities, this is governed by Transport Canada’s Rules Respecting Key Trains and Key Routes.</p>
<p>Route Selection</p>
<p>The following is in response to comments submitted by Sylvain Robert, Lise Grenier, Chantale Roy, and Marc Lemieux.</p> <p>The route for the proposed Lac-Mégantic Bypass was established prior to CPKC’s purchase of CMQR and subsequent involvement in the project. In 2015, AECOM was retained by the City of Lac-Mégantic to evaluate potential routes for a bypass around downtown Lac-Mégantic. This study considered topography, proximity to residential areas, and watercourse and road crossings amongst other factors. The preferred alignment from that study was carried forward into the initial provincial environmental review (BAPE) process and was ultimately the corridor that Transport Canada instructed CPKC to use for the detailed design of the project.</p> <p>The 2017 BAPE Report and the CPTAQ concluded that out of the five options identified at that time, the proposed route represented the most advantageous option considering its environmental, social and economic benefits, and considering it had the least impact on agricultural lands. Section 3 of Appendix 3-1 – Environmental Effects Evaluation presents a description of alternative routes as well as the retained route and its variants.</p>
<p>Noise and Vibration</p>
<p>The following is in response to comments submitted by Sylvain Robert, Chantale Roy, and Marc Lemieux.</p> <p>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</p>

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.

Property Value

The following is in response to comments submitted by Sylvain Robert.

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.

Mental Health

The following is in response to comments submitted by Sylvain Robert.

The health, including the mental health, of people living in the region is assessed in section 6.4.13 on Appendix 3-1 – Environmental Effects Evaluation. The potential for the Project to affect the psychological health of the population located close to the new railway could be associated with a possible decrease in sense of safety and an increase in stress for those nearby and/or affected by the Project. The presence of tracks, related infrastructure, and train circulation could cause concern and stress to some residents, and some people, notably those opposed to the Project, could take time to adapt to it. Concurrently, the Project has the potential to result in positive psychological aspects for other residents, including an increased sense of safety, as the trains will avoid the densely populated downtown area of Lac-Mégantic.