

**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 13 and 19, 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

The following is in response to comments submitted by Jean Paradis, Fannie Martin, Lucille Carrier, Marie-Ève Perreault, Annie Grenier, Daniel Charrier, and Bernard Bédard.

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.

Groundwater and Potable Water

The following is in response to comments submitted by Paul Droion, Jean Richard, Jeannette Roy, Magella Roy, Carmen Labbé, Donald Stewart.

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.

As described in Transport Canada’s GPWWMP, monitoring of individual wells will occur on a regular basis so that trends can be identified and mitigations implemented at the different threshold levels (which in all cases are prior to wells running out of water). The specific intervention thresholds are described in Section 6 of the plan.

As stated in Section 7.5 of Appendix 2-7 – Hydrogeology Report, “residences connected to the municipal supply are not expected to be impacted by the [groundwater] drawdown”. The GPWWMP also states that, out of an abundance of caution, the municipal wells will be monitored.

Risk of Contamination

The following is in response to comments submitted by Paul Dorion, Magella Roy, Donald Stewart.

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 Jean Richard, Jeannette Roy, Magella Roy, Donald Stewart.

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, should there be impacts observed during the implementation of

<p>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).</p>
<p>Hydrogeology</p>
<p>The following is in response to comments submitted by Jeannette Roy and Magella Roy.</p> <p>The Hydrogeology Study (Appendix 2-7) was completed to calculate the rate at which water is expected to flow into the project area during construction so that the contractor can have appropriate plans in place. As part of this Study, the consultant presented a high level (order of magnitude) projection of the area where the groundwater might be lowered and by how much it could potentially be lowered by. There is no underground lake which can collapse leading to a train accident. The ground water moves through the pore space in the rock and other sediment underlying the project area.</p>
<p>Surface Water</p>
<p>The following is in response to comments submitted by Jeannette Roy.</p> <p>Effects on surface water are discussed in Sections 6.3.4 (Construction Phase) and 6.4.4 (Operation Phase) of Appendix 3-1 – Environmental Effects Evaluation (“EEE”). With the exception of the reduction in surface water flow due to the lowering of the groundwater table (construction phase), which could be either significant or insignificant, the potential impact on all of the potential effects considered was found to be insignificant. 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 – Communications on Potential Additional Studies. Additionally, as detailed in Appendix 5-4 – Construction Monitoring Plan for Surface Water, the quality of the surface water will be monitored during the construction phase of the project.</p>
<p>Route Selection</p>
<p>The following is in response to comments submitted by Paul Dorion, Jean Richard, Jeannette Roy, Magella Roy, Donald Stewart, Annie Grenier.</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>Property Value</p>

<p>The following is in response to comments submitted by Paul Dorion, Jeannette Roy, Magella Roy.</p> <p>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.</p>
<p>Derailment Response</p>
<p>The following is in response to comments submitted by Paul Dorion, Magella Roy, Carmen Labbé.</p> <p>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.</p>
<p>Mental Health</p>
<p>The following is in response to a comment submitted by Magella Roy.</p> <p>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.</p>
<p>Transport Canada Regulations</p>
<p>The following is in response to a comment submitted by Carmen Labbé.</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>CPKC Ownership of the Track</p>
<p>The following is in response to a comment submitted by Magella Roy.</p>

CPKC (previously Canadian Pacific) purchased the track running through Lac Megantic (part of the larger acquisition of the Central Maine & Quebec Railway (“**CMQR**”)) from Fortress Investment Group, LLC in December 2019. At the time of the derailment in 2013, CP did not own or operate the track; the line was owned and operated by Montreal, Maine and Atlantic Railway which is no longer in business.

Since CPKC’s purchase of CMQR 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 *Rules Respecting Track Safety*). This has included the installation of new ties and rail, upgrades to the ballast and repair and replacement of watercourse crossings.