

**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 19 and 23, 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 Jean Ruel, Stéphane Vachon, Sébastien Roy, Antoine Richard, Josée Richard, Ghislaine Girard, Eric Lucas, Julie Fortier Lauzon, Francis Paré, Guy Jodoin, Mo Jack, Marilyne Brochu, Christian Perreault, Jacques Dostie, Colette Roy Laroche, Pascal Ducharme, Carmen Bilodeau, Marie-France Paradis and Joël Chotte.</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>
Longest and Steepest Railway Grades in Canada
<p>The following is in response to comments submitted by Christian Perreault and Colette Roy Laroche.</p> <p>The grade of CPKC’s Sherbrooke Subdivision between mile post 0.2 and mile post 3.6 (the track segment between downtown Lac Megantic and the start of the Heavy Grade west of the Route 161 Crossing) averages 1.43%. Considering just CPKC’s track across Canada (i.e., not including track owned by CN or other rail operators), this rail grade is not in the top 50 steepest grades.</p>
Inspection and Maintenance of Existing Track

The following is in response to comments submitted by Christian Perreault, Guy Jodoin, Mo Jack, Carmen Bilodeau, Pascal Ducharme, Colette Roy Laroche, Erwann Galipeau-Théberge and Sylvain Lamothe.

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 *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.

The Transport Canada Rules Respecting Track Safety specify minimum inspecting and testing intervals for operating railway track (based on annual tonnage). As a Class 3 Track, the existing track is subject to the following inspections:

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

The railway sector in Canada is a highly regulated industry. Specific to speed limits for trains carrying certain regulated commodities, this is governed by Transport Canada’s [Rules Respecting Key Trains and Key Routes](#).

Groundwater, Potable Water and Risk of Contamination

The following is in response to comments submitted by Chloé Vallée, Mo Jack, Julie Fortier Lauzon, Marilyne Brochu, Maory Roy, Carmen Bilodeau, Joël Chotte, Léon Ducharme, Marie-France Paradis, Pascal Ducharme, Denise Lacroix, Linda Lacasse, Paul Dorion, Patrick Boulet, Maude Lambert and Nadine Rioux.

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.

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). Pursuant to mitigation measure TC-SG-01, Transport Canada is responsible for implementing and adhering to the conditions within the GPWWMP. The preamble of the GPWWMP specifies that “while the implementation of the GPWWMP will be delegated to one of [the] municipalities through a contribution agreement, Transport Canada is responsible for the development and the implementation of the GPWWMP, including any issues related to this plan and its implementation.”

Through the GPWWMP, Transport Canada has confirmed that it will fulfil its commitment to monitor water quantity and quality within the assessment area during the bypass construction, the post-construction period, and until the water table is stabilized, and to take corrective measures when needed.

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.

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”. Appendix 5-7 – Groundwater and Potable Water Well Monitoring Plan also states that, out of an abundance of caution, the municipal wells will be monitored.

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 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.

Moreover, 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>

Risk of Flooding and Rate of Groundwater Discharge

The following is in response to comments submitted by Denise Lacroix, Chloé Vallée, Maory Roy and Maude Lambert.

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 (0.045% increase; see Appendix 2-7 Hydrogeology Report).

Impact of Property Values

<p>The following is in response to comments submitted by Linda Lacasse and Maude Lambert.</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>Impacts to Wetlands</p>
<p>The following is in response to comments submitted by Denise Lacroix, Mo Jack, Julie Fortier Lauzon, Marilyne Brochu, Carmen Bilodeau, Joël Chotte, Marie-France Paradis, Pascal Ducharme, Nadine Rioux, Erwann Galipeau-Théberge, Maory Roy, Maude Lambert and Léon Ducharme.</p> <p>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.</p>
<p>Project Design</p>
<p>The following is in response to comments submitted by Patrick Boulet.</p> <p>As shown on the Design Drawings included as Appendix 2-3 Drawing Package, the proposed bypass has been designed with continuously welded rail.</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 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.</p> <p>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.</p>
<p>Traffic</p>
<p>The following is in response to comments submitted by Maude Lambert.</p> <p>As more fully described in Section 6.4.9 of the Environmental Effects Evaluation (Appendix 3-1), there is projected to be an overall positive impact</p>

on traffic in the Lac Mégantic Bypass project area. The removal of the railway from the downtown will improve the fluidity of traffic in this sector and there will be a net reduction of 10 public grade crossings as well as a net reduction of 3 private grade crossings.

Environmental Risk

The following is in response to comments submitted by Maxime Jalbert-Ducharme.

As identified in Appendix 3-1 – Environmental Effects Evaluation, 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. The residual effects on private wells have been assessed to be insignificant with the implementation of mitigation measures.

Route Selection

The following is in response to comments submitted by Eric Lucas, Maory Roy, and Marilyne Brochu.

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.

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.

Noise and Vibration

The following is in response to comments submitted by Joël Chotte.

Services and volume capacity of the Lac-Mégantic Bypass are expected to remain materially similar to current operations (although it should be noted this may change in the future based on shippers’ needs). Currently, there are between two and four through freight trains each day and one local service train.

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.

Mental Health

The following is in response to comments submitted by Joël Chotte.

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.