

**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 24 and 30, 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 Nadia (Weena) Tanguay, Edith Bolduc, Jean Perreault, René-Paul Lacombe, Jacques Bouffard, Edith Guérin, Nathalie Gervais, Suzanne Bouffard, Louise Leblanc, Valérie Blais, Lise Beaudoin, Serge Pelletier & Martine Boulet-Pelletier, Gabrielle Rodrigue, Lucille Carrier, Claude Grenier, Nathalie Bastarache, Loraly J. Grenier, Gilles Charest, Lucie Charest, Bernard Boulet, Geneviève Forest Boulanger, Lucie Bilodeau, Michel et Raymonde Lapointe, Caroline Mercier, André Mercier, Jerry Perron, Nancy Boulanger, Denise Pagé, Dominique Simard, Sarah Orichefsky, Jacinthe Lachance, Émilie Breault, Réal Pépin, Gérald Lacroix, Clara Grenier, Diane Bureau, Daniel Morin, Christine Poulin & Richard Turcotte, François Bilodeau, Sara Beaulieu, Carole Custeau, Guy Sénéchal, Linda Boulet, Laurie Gilbert, William Leclerc Bellavance, Anaëlle Cayer, Marie-Christine Picard, Isaac Grenier, Brigitte Ruel-Lemay, Claude Bissonnette, Estelle Compagna & Paul Lemieux, André Michaud, Claire Laflamme, Madeleine Roy, Julie Patry, Maxime Tye-Gingras, Louise Campeau, Sebastien Bolduc, Julie Perreault, Lisette Bolduc, Jean Marc Gagnon, Eric Mercier, Marcel Vaive, Alex Poulin, Thomas Grenier, Charline Gervais Brosseau, Francine Blais, Lucie Gendreau, Janot Gosselin, Martine Guermeur, Jean Paradis, Pierre Cloutier, Christian Pépin, Lina Langford, Manon Bernard, Luce Robineau, Sophie Bilodeau, Doris Cappiello & Jacques Vaillancourt, Karine Dubé, Sonia Grenon, Lyne Girard, Gilles Fluët, Normand Desbiens, Danielle Harton, Denis Roy, Luce Rancourt, Mme Prud'homme, Hugo Anctil, Paul Dorion, Patrick Boulet, Gilles Beaulé, Valérie Jodoin, Marie-Ève Poulin, Arianne Rancourt, Gaby Morin, Véronique Jodoin, Pierrette Blais-Fortin, Donald Stewart, Alain Denis, André Blais, Jessy Bellefleur, Jacinthe Lafontaine, Réjean Roy, Nathalie Turcotte, Hélène Lecours, Linda Proteau, Annie Gilbert, Sylvain Rancourt, Sylvie Boucher, Gaétane Gosselin, Suzanne Perron, Lisa Grenier, Serge Liard, Maryse Boulanger, David Charron, Ariane Montminy, Emile Rolland, Isabelle Grégoire, Alexandre Marchand, Paul Dorion, André Martel, Luc Blais, Sylvie Boucher, Maurice Bernier, Nicole Corrado, Vincent Isabel, Leonard Mason, Nicole Nolet, Guy Bouchard, Jacques Boulet, Lucie Viau, Marilyse Couture, Rose-Marie Robert, Anne-Sophie Robert, Yolande Boulet Bélanger, France Bédard & Jacques Roy, Pierre-Luc Bureau, Roger Venne, Elizabeth Veary, Audrey Dallaire, Benoit Deslandes, Josée Morin, Kurt Lucas, Village Harmonie, Jacques Gagnon, Ginette Isabel, Venette

Guay, Anne-Josée Bégin, René Boutin & Isabelle Boulanger, Monique Lacroix, Daniel St-Pierre, Carole Lessard & Benoît Vachon, Yvette Cellard, Maryse Morin, Paul Dorion.

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, Potable Water and Risk of Contamination**

The following is in response to comments regarding Groundwater, Potable Water and Risk of Contamination.

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”. The GPWWMP 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>

**Responsibility regarding the implementation and insurability of the Groundwater and Potable Water Well Monitoring Plan**

The following is in response to comments regarding Responsibility with respect to the implementation and insurability of the Groundwater and Potable Water Well Monitoring Plan.

Reference is made to an agreement between the Municipality of Frontenac and Transport Canada regarding the implementation of the Groundwater and Potable Water Well Monitoring Plan (“**GPWWMP**”) by the local municipality. The Applicant is not party to this agreement and therefore has no knowledge of its content.

Regarding the responsibility for the GPWWMP, 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.”

Transport Canada has prepared and asked the Applicant to include further comments as follows:

- Transport Canada is committed to the implementation of the GPWWMP developed by Laforest Nova Aqua as part of the mitigation measures identified in the BAPE reports.
- Through the GPWWMP, Transport Canada will fulfil its commitment to monitor water quantity and quality during the bypass construction and until the water table is stabilized, and to take corrective measures when needed.
- The Municipality of Frontenac confirmed by a council resolution on December 3, 2024, that they want to take on the implementation of the GPWWMP.
- Since March 2025, Transport Canada has been collaborating with the Municipality of Frontenac and the municipalities covered by the GPWWMP to draft and negotiate a contribution agreement for the implementation of the GPWWMP.
- Great progress has been made on the contribution agreement draft, and Transport Canada continues to support the Municipality of Frontenac in finding a solution to the insurance matter to conclude a contribution agreement.
- Transport Canada reiterates its commitment to protecting existing groundwater and drinking water well levels and quality.

- Since negotiations are ongoing, Transport Canada is not in a position to comment any further.

**Longest and Steepest Railway Grades in Canada**

The following is in response to comments regarding the Longest and Steepest Railway Grades in Canada.

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.

**Condition, Inspection and Maintenance of Existing Track**

The following is in response to comments regarding the Condition, Inspection and Maintenance of the Existing Track.

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 Transport 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:

<b>Inspection / Test</b>	<b>Less than 5 MGT</b>	<b>5 - 15 MGT</b>	<b>Greater than 15 MGT</b>
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 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](#).

**Route Selection**

The following is in response to comments regarding the bypass Route Selection.

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.

**Impacts to Wetlands and Vegetation**

The following is in response to comments regarding Impacts to Wetlands and Vegetation.

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 further indicated 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).

As described more fully in Section 5.3.6 of the EEE, the initial assessment was completed based on the 2018 environmental impact assessment (“EIA”) produced as part of the BAPE process. This EIA relied on a review of aerial imagery and publicly available mapping. In order to increase the accuracy of the estimation of the area and types of wetlands which would be impacted by the project, Transport Canada commissioned a field study in 2024 of the future Right-of-Way which would be permanently impacted by the project. In 2025, additional refinement was made to wetland areas and types outside of the future Right-of-Way using more recent aerial images. Both of these activities led to updates in the EEE which more accurately predict the potential impacts of the project.

**Birds, Mammals, Amphibians, and Reptiles and their Habitats**

The following is in response to comments regarding Birds, Mammals, Amphibians, and Reptiles and their Habitats.

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. 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).

**Water Management and Risk of Flooding**

The following is in response to comments regarding Water Management and Risk of Flooding.

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.

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).

**Expropriation**

The following is in response to comments regarding Expropriation.

As detailed in Appendix 1-5 – Land Acquisition Report, the Government of Canada followed a multi-step process to secure the land required for the proposed project. After several years of discussions and negotiations with individual landowners, expropriation of the remaining parcels of land was required. Transport Canada mandated Public Services and Procurement Canada (PSPC) to acquire the lands required to complete the project.

The compensation paid to individual landowners is private information. In accordance with the *Expropriation Act*, an additional 10% compensation was paid to the owners for early possession of the land.

### **Derailment Response**

The following is in response to comments regarding Derailment Response.

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>

### **Impact to Property Values**

The following is in response to comments regarding the Impact to Property Values.

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.

### **Traffic, Road Safety and Emergency Response**

The following is in response to comments regarding Traffic, Road Safety and Emergency Response.

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 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 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.

### **Project Financing**

The following is in response to comments regarding Project Financing.

In 2018, the governments of Canada and Québec announced the conclusion of an agreement in principle to jointly fund the Lac-Mégantic Bypass, with Canada assuming 60% and Québec assuming 40% of the total costs. At this juncture, TC assumed the responsibility for progressing the Project. On December 20, 2022, the Prime Minister of Canada and the Premier of Québec reaffirmed their funding commitments for the Project.

At the request of the Government of Canada (Transport Canada), CPKC submitted the Application, as the operating railway company and on behalf of its subsidiary Central Maine and Québec Railway Canada Inc. (“**CMQR**”), to the Canadian Transportation Agency pursuant to Section 98 of the *Canada Transportation Act* for an order approving the construction of a proposed railway line, the Lac-Mégantic Bypass, for the purpose of relocating segment of track owned by CMQR that traverses the downtown area of the City of Lac-Mégantic.

**Mental Health**

The following is in response to comments regarding Mental Health.

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.

**Stakeholder Engagement**

The following is in response to comments regarding Stakeholder Engagement.

Transport Canada committed to conduct in-depth public consultation on the Lac-Mégantic Bypass to give citizens, landowners and other stakeholders of Nantes, Lac-Mégantic and Frontenac the opportunity to express comments, concerns and perspectives. Appendix 4-2 – Stakeholder Engagement Report provides detailed information regarding the public consultation activities Transport Canada led in 2023, 2024 and 2025, including open houses, question and answer sessions, and online consultations.

Specific to the issue of impacts to landowners’ potable water wells, Transport Canada held sessions in November 2024 just for the owners of these wells where they presented the Groundwater and Potable Water Well Monitoring Plan and answered their questions on this topic, including one on one discussion with landowners on their specific concerns.

**Noise and Vibration**

The following is in response to comments regarding Noise and Vibration.

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.

**Socioeconomics**

The following is in response to comments regarding Socioeconomics.

As detailed in sections 6.3.8 and 6.4.8 of Appendix 3-1 – Environmental Effects Evaluation, in general, the wide range of activities, the purchase of goods and services from local and regional suppliers as well as the employment of workers from the region during the construction phase will create business opportunities and contribute to local and regional economies. Moreover, the relocation of the railway outside downtown of Lac-Mégantic could lead to the development of new projects. With the trains avoiding the downtown area, this will offer improved living conditions to these residents and businesses. The fact that there are no waiting times or queues at intersections with a railway to get to the city centre can make it more easily accessible and therefore more attractive for people and businesses.

**Regulated Commodities**

The following is in response to comments regarding Regulated Commodities.

Regulated commodities are the products which make modern life possible. They purify our drinking water, fuel our vehicles, and heat our homes. As a common carrier, CPKC is legally required to transport these goods for any customer who requests service. Services and volume capacity on the railway line following the construction of the Lac-Mégantic Bypass are expected to remain consistent with current operations on this line at the time of the permanent transfer of railway operation over to the Lac-Mégantic Bypass. Services and volumes will fluctuate in response to shippers' needs over time.