

**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 TO DECEMBER 23, 2025**

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 November 20, 2025.

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

|  |
|--|
| <b>Safety of Design</b>  |
| The proposed bypass has been designed by professional engineers in accordance with accepted engineering principals and standards (as confirmed by the placement of the professional stamps on the drawings included Appendix 2-3 – Drawing Package). As described in Appendix 2-2 – Bypass Design Criteria, the engineering design of the bypass conforms to the requirements set by the Transport Canada Rules Respecting Track Safety for Class 3 track, the standards set by the American Railway Engineering and Maintenance of Way Association (AREMA) in the 2024 version of the Manual of Railway Engineering as well as other published engineering standards. |
| <b>Impact to Lac Megantic Water Intake</b>   |
| 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”.  |
| <b>Impacts on Wetlands</b>   |
| As described in Appendix 3-1 – Environmental Effects Evaluation (“ <b>EEE</b> ”), due to the level of uncertainty surrounding the extent and magnitude of the potential groundwater drawdown, it is not possible to determine the significance of the impacts on 1) the reduction in streamflow due to lowering of the groundwater table; 2) the loss of wetlands and forests due to hydrogeologic impacts; and, 3) the modification or loss of wildlife habitat due to hydrogeological impacts.   |
| As further indicated in the 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).”

Should there be permanent loss of wetlands observed outside the ROW, Transport Canada has committed to providing a financial contribution to the provincial wetland habitat compensation program. Mitigation measures to address potential loss of ecosystem functions provided by wetlands at a local or regional level, modification or loss of wildlife habitat due to hydrogeological impacts, or reduction in streamflow due to the potential lowering of the groundwater table are not part of the bypass project.

As described in Appendix 5-8 – Wetlands Monitoring Plan, if the permanent loss of wetlands is greater than 35ha, Transport Canada has committed to make additional contributions to the Provincial wetland habitat compensation program to offset the habitat loss.

#### **Risk of Contamination of Drinking Water Wells**

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.

#### **Public Consultation**

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.

#### **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.

**Erosion and Sediment Control**

As detailed in Table 6-9 of Appendix 3-1 – Environmental Effects Evaluation, mitigation measures with respect to erosion and sediment control include, among others, minimizing stripping, clearing, excavating, backfilling and grading of work areas to prevent erosion, and, following construction works, restoring drainage and stabilizing soils susceptible to erosion. As further described in Section 7 of Appendix 5-3 – Construction Environmental Management Plan, the contractor hired to build the bypass will be required to install temporary retention structures (such as straw bales, geotextile barriers or filter berms) to reduce bank erosion and protect watercourses. Additionally, they will not be permitted to stockpile surplus material within 30 m of a lake, stream, shrub swamp or march and stockpiling will not be permitted within 100 m of an open bog.