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Secretary (By Email: <secretariat@otc-cta.gc.ca>)
Canadian Transportation Agency
15 Eddy Street
Gatineau, Quebec J8X 4B3

Complaint: Maniwaki Subdivision, Mileage 0.0-20.3 (Gatineau, Chelsea, La Pêche QC)

1. On 2 May 2016 Moose Consortium Inc. (Moose) submitted to the Canadian Transportation Agency (the Agency) a request for determination of jurisdictional authority relating to the Maniwaki Subdivision (mileage 0.0 to 20.3) between Gatineau and La Pêche (Québec).
2. On 21 July 2016 the Agency issued a staff letter (#16-02997) to report their conclusion that, based on their search of records relating to this railway, it is no longer part of the federal transportation system because:
 - 2.1. Canadian Railway Board Order No. 112001 of June 8, 1966 authorized Canadian Pacific to abandon the operation of the section of the Maniwaki Subdivision between Miles 0.0 and 2.23.
 - 2.2. Subsequently, Commission Order No. R-37548 of 11 December 1984 authorized CP to abandon the operation of the section of the Maniwaki Subdivision Mile 3.0 and Mile 80.7.
3. Between July 2016 and July 2017 Moose Consortium Inc. has undertaken an additional search for relevant documents. The company hereby submits its findings, and in light of the following facts Moose makes the following two requests:
 - 3.1. **Moose requests that the Agency, pursuant to Section 32 of the Act, review the decisions and orders of 1966, 1984 and 1985 relating to discontinuance of the Maniwaki Subdivision (mileage 0.0-20.3) in light of the historical facts (sequence of legislative acts and regulatory determinations, subsequent actions, and physical factors). Moose submits that there have been changes in the facts and circumstances pertaining to these decisions and orders of sufficient importance to warrant their review, rescission or variance.**
 - 3.2. **Moose asks that, pursuant to Section 28 (2) of the Act, the Agency take steps immediately to issue an interim order for the Municipality of Chelsea, and all related parties acting as agents or representatives or all bodies having a contract or agreement with the Municipality of Chelsea, refrain from dismantling any railway structure of the Maniwaki Subdivision, pending:**
 1. **A Section 32 Review of previous decisions and orders by the Agency with regard to this railway, resulting in clarification relating to jurisdiction and ownership;**
 2. **Completion of the studies that the Agency staff described to Moose Consortium Inc. for its pending re-submission of an application for a certificate of fitness to develop an interprovincial railway undertaking that would include this railway work;**
 3. **Agency review of Moose Consortium Inc.'s re-submitted application for the aforementioned certificate of fitness.**

Initial Historical Facts

4. Two separate acts of Parliament declared first the railway infrastructure, and second a railway operation upon it, to be under federal jurisdiction.
 - 4.1. This particular railway right-of-way through Chelsea was first authorized for construction by Parliament on 23 June 1887 under “An Act respecting the Ottawa and Gatineau Valley Railway Company”, and it was built between 1888 and 1891. In that original federal Act the railway infrastructure was “declared to be a work for the general advantage of Canada” referencing section 92.10 (c) of the Constitution of Canada.
 - 4.2. Some years later, on 23 July 1894, Parliament passed a separate “Act to consolidate and amend certain Acts relating to the Ottawa and Gatineau Valley Railway Company”, which provided that “The undertaking of the Ottawa and Gatineau Valley Railway Company ... is hereby declared to be a work for the general advantage of Canada.”
5. The Maniwaki Subdivision was built between 1889 and 1902 by the Ottawa and Gatineau Valley Railway Company (OGVRC). Its name was changed to the Ottawa and Gatineau Railway Company (OGRC) in 1894. The company's name was again changed in 1901 to the Ottawa Northern and Western Railway Company (ONWRC). In 1902, the line was leased to the Canadian Pacific Railway Company for 999 years. Under federal Statutory Orders and Regulations in 1958 the railways and undertakings of the ONWRC were vested in the Canadian Pacific Railway Company.
6. In 1926 Canadian Pacific relocated parts of the Maniwaki Subdivision to accommodate hydro-electric developments on the Gatineau River. (Miles 8.12 to 12.67; 13.26 to 14.6; and 14.96 to 15.28).

Reasons for a Section 32 Review, and for an Immediate Section 28 (2) Interim Order

7. Moose Consortium Inc. acknowledges:
 - 7.1. Upon File No. 39309.72 of 8 June 1966 the Board of Transport Commissioners of Canada authorized Canadian Pacific to abandon its railway operations on the section of the Maniwaki Subdivision between Miles 0.0 and 2.23;
 - 7.2. Upon Order No. R-37548 of 11 December 1984, the Canadian Transport Commission authorized CP to abandon the operation of the section of the Maniwaki Subdivision between Miles 3.0 and 80.7.
 - 7.3. Upon Order No. R-38843 on 20 December 1985, the Canadian Transport Commission delayed the abandonment between mileage 0.0 and 20.3 until 1 June 1986.
8. Notwithstanding these above-mentioned authorizations, here we present various documents which demonstrate that discontinuance of the Maniwaki Subdivision between mileage 0.0 and 20.3 was rendered ambiguous because in fact, they were not used. Therefore Moose requests that the Agency, pursuant to Section 32 of the Act, review the decisions and orders of 1966, 1984 and 1985 relating to discontinuance of the Maniwaki Subdivision (mileage 0.0-20.3) in light of the historical facts (sequence of legislative acts and regulatory determinations, subsequent actions, and physical factors). Moose submits that there have been changes in the facts and circumstances pertaining to these decisions and orders of sufficient importance to warrant their review, rescission or variance. Sections 146(1), 146.01 and 146.02 of the Act may provide direction towards a remedy in this case.
9. The attached scan of a document under CP Rail letterhead (File No. 872-116, dated 2 July, 1986), shows that one month after the date authorized for final abandonment, Canadian Pacific jointly signed a letter of agreement with the Municipality of Hull (now Gatineau), the Municipality of West Hull

(now Chelsea), and the Municipality of La Pêche (including Wakefield) to express the understandings they reached in a meeting held on 27 June 1986. This letter of agreement states that Canadian Pacific would operate an interprovincial tourist train service between Ottawa, Ontario and mileage 3.0 of the Maniwaki Subdivision during the years 1986 and 1987, and further that Canadian Pacific would provide crews to operate tourist trains between mileage 3.0 and Wakefield Québec in 1986 and 1987. The signed letter of agreement further states that during the years 1988, 1989 and 1990 "Canadian Pacific will, upon request of the municipalities, operate tourist passenger trains over its railway between Hull Station (Montcalm Street) and mileage 3.0 and over the trackage of the municipalities (mileage 3.0 to Wakefield) subject to terms and conditions to be negotiated".

10. Paragraph 12 and 13 of the aforementioned July 1986 letter of agreement refers explicitly to continued federal jurisdiction over this railway as follows: (12) "between Montcalm Street, Hull, Quebec, and mileage 3.0, Maniwaki Subdivision ... the municipalities undertake to comply with all Federal railway regulations, rules and orders ... insofar as same may affect Canadian Pacific"; and (13) "The municipalities further undertake to apply for and obtain all necessary regulatory approvals, licenses and permits applicable to the said construction and for the operation of their undertaking."
11. Moose notes that in *The Queen v. Board of Transport Commissioners* (1968) the Supreme Court of Canada found the GO Train in the Greater Toronto Area to be under federal regulation because "Parliament of Canada has jurisdiction over everything that physically forms part of a railway subject to its jurisdiction. (The Queen v. Board of Transport Commissioners, [1968] S.C.R. 118 Date: 1967-11-20) <https://scc-csc.lexum.com/scc-csc/scc-csc/en/4749/2/document.do> Accordingly, if the Maniwaki Subdivision south of Mileage 3.0 remained under federal jurisdiction, that applied to the entire 20.3 km railway.
12. Furthermore Paragraph 15 of the letter of agreement states: "The municipalities undertake that at all times in the future the priority of the rights of Canadian Pacific with respect to usage of its right-of-way between Hull, Quebec (Montcalm Street) and mileage 3.0, Maniwaki Subdivision, will be recognized and preserved by the said municipalities."
13. The attached scan of the declaration of donation by Canadian Pacific in 1987 of the railway between Mileage 3.0 and 20.3 of the Maniwaki Subdivision (#237753 registered in Gatineau on 15 January 1987 states that « VILLE DE HULL, et CORPORATION MUNICIPALE DU CANTON DE HULL, PARTIE OUEST et LA MUNICIPALITE DE LA PÊCHE sont ci-après nommées co-jointement les "Donnataires".» This railway was donated "jointly" to the three municipalities. (Again for clarification, the Municipality of Chelsea was formerly named la Corporation municipale de canton de Hull, Partie ouest.)
14. On 27 June 1992 the Hull, Chelsea and Wakefield Railway commenced operation over the former Canadian Pacific Maniwaki subdivision between Hull and Wakefield. On 17 October 1999, the Hull, Chelsea, Wakefield Railway opened a new connection with the Canadian Pacific Lachute subdivision at Laman.
15. Therefore discontinuance authorizations of 1966, 1984 and 1985 for mileage 0.0 to 20.3 of the Maniwaki Subdivision were rendered ambiguous, and possibly abeyant. Had the discontinuance authorizations of 1966, 1984 and 1985 been brought to fruition in relation to the Maniwaki Subdivision between Gatineau and La Pêche (Québec):
 - 15.1. Canadian Pacific would not have maintained its rights with respect to usage of its right-of-way between Hull, Quebec (Montcalm Street) and mileage 3.0, Maniwaki Subdivision. Yet Canadian Pacific did continue to assert those rights after 1985.
 - 15.2. Canadian Pacific would not have continued to carry on business offering interprovincial passenger rail services extending from Ottawa through Gatineau to Wakefield. Yet Canadian Pacific did carry on business dealings after 1985 which included the Maniwaki Subdivision.

- 15.3. The municipalities signing the letter of agreement would not have needed to commit to compliance with Federal railway regulations for Maniwaki Subdivision. Yet the municipalities which signed the document did formally accept federal jurisdiction after 1985.
16. A Section 32 review of the discontinuance of mileage 0.0 to 20.3 of the Maniwaki Subdivision would require retracing historical land title, transfer and survey records, in order to establish definitively which legal entity or entities hold rights and responsibilities today for the corridor.
17. On 15 June 1993, in order to enable the three municipalities to fulfill their obligations under the 1986 agreement, the Quebec National Assembly created « La Compagnie de chemin de fer de l'Outaouais (CCFO) » with passage of « le Projet de loi 244 (Loi concernant la Compagnie de chemin de fer de l'Outaouais, Assemblée Nationale, 34^{ième} législature, deuxième session, 1993, chapitre 102 - Entrée en vigueur le 15 juin 1993) ». This law refers to the activities of CCFO, but it does not address title to the corridor lands nor the railway infrastructure. This Act states (emphasis added):
- 17.1. *« ATTENDU que les municipalités de Hull, Chelsea et La Pêche ont résolu de promouvoir le développement et l'exploitation d'un produit touristique dans leur collectivité ...*
- 17.2. *Que pour réaliser ces fins, elles ont initié le processus de création de la Corporation "Conseil de développement touristique Hull-Chelsea-La Pêche inc., constituée le 18 juin 1986 en vertu de la Loi sur les corporations canadiennes;*
- 17.3. *Que le train touristique Hull-Wakefield fait partie de la stratégie de développement touristique de la région de l'Outaouais en raison entre autres, de sa localisation à proximité de la capitale nationale;*
- 17.4. *Qu'aux fins d'assurer le respect des obligations existantes et de doter la région de l'Outaouais d'un véhicule capable de garantir la continuité des opérations de chemin de fer à des fins touristiques, il est approprié de constituer une compagnie de chemin de fer. »*
18. Several official documents demonstrate that the Maniwaki Subdivision between mileage 0.0 and 20.3 was acquired jointly (co-jointement) by the three municipalities La Pêche, Chelsea and Gatineau. There is no evidence in publicly-available records that any one of the municipalities La Pêche, Chelsea or Gatineau has the freehold ownership title required to unilaterally initiate modification to or discontinuance of any part of the Maniwaki Subdivision through their respective territories.
19. On April 5, 2016, the Municipality of Chelsea published in the newspaper Le Droit a "Préavis d'abandon" referring to "à l'article 48 de la Loi sur la sécurité du transport terrestre guidé" which explains that: « la municipalité de Chelsea a avisé, en date du 3 février 2016, le Ministre des Transport du Québec qu'elle abandonne l'exploitation de la voie ferrée Hull-Chelsea-La Pêche sur son territoire en date du 3 mai 2016. »
20. The normal management sequence applicable to railway discontinuance at both provincial and federal levels is for a railway company to first obtain authorization to discontinue a railway, and only after obtaining authorization by the regulator, to terminate core maintenance and repairs. In this case, the Municipality of Chelsea notified the Ministère des Transports du Québec of its intention to abandon the railway a full six years after the railway was rendered unusable as a result of withholding maintenance. Between 24-26 June 2011, heavy rains combined with poor drainage maintenance to cause the seven washouts along the Maniwaki Subdivision. This municipality has been unprepared since 2011 to resource the basic railway maintenance and repairs to the legally active railway for which it has had existing obligations. Constructive discontinuance of railway infrastructure by a public or private sector railway company is contrary to the intent of applicable railway laws and regulations, in both federal or provincial jurisdictional contexts.
21. On 5 June 2017 the council of the Municipality of Chelsea passed a motion with the following three commitments:

- To award a contract for \$130,185.04 to the firm of PNR Railworks Quebec Inc. to remove the rails and ties from Loretta Road to the northern municipal boundary – 20.5 kilometers;
 - To designate the use of the corridor for non-motorized or ‘active transportation’ purposes only;
 - To remove the rails and ties from the corridor before the start of the 2017-2018 season of the “winter trail” [for cross country skiing] if financing is available to cover the estimated costs.
22. During public questions to the mayor at the council meeting of 5 June 2017, a representative from Moose asked: “Which external stakeholders have been formally consulted about the removal of the rails from the existing railway corridor within Chelsea's boundaries?” Mayor Caryl Green replied that no formal consultations regarding this dismantling of the railway had been undertaken with citizens or businesses within Chelsea or in surrounding municipalities, nor with the National Capital Commission (NCC).
23. In June 2017 a private citizen, Tim Kehoe (not connected with Moose Consortium Inc.), applied to the Quebec Superior Court for an injunction against dismantlement of the Chelsea section of the Maniwaki Subdivision based on the singular argument that an environmental assessment must first be completed (No.550-17-009793-173, Cour supérieur du Québec, District de Gatineau. Tim Kehoe v. Municipalité de Chelsea). Mr. Kehoe’s provincial case did not address any of the issues raised in Moose’s present complaint with the federal Agency. Given the particular factors involved in Mr. Kehoe’s case, however, Moose did provide an affidavit in support of the appellant (attached). The Ministry of Sustainable Development, Environment, and Action against Climate Change, Québec chose to not require an environmental impact assessment for this railway dismantlement, and on Friday 28 July 2017 Mr. Kehoe’s request for an injunction was rejected.
24. On the same day as the decision in Tim Kehoe v. Municipalité de Chelsea, local media reported: "La municipalité de Chelsea ira de l'avant avec le démantèlement de la voie ferrée et des dormants sur son territoire dès le début du mois d'août." Source: <http://www.tvagatineau.ca/articles/20170728184753/>
25. Notwithstanding that there may be no legal requirement for an environmental impact assessment for this railway dismantlement, there is no context in the normal precepts of Canadian governance, federal or provincial, in which the Municipality of Chelsea would possess unconstrained prerogative to pursue a unilateral and fragmentary approach to dismantling a section of contiguous railway between other municipalities, and in the present context, between parts of the National Capital Region, spanning territories in Québec and Ontario as established in the National Capital Act. Actions with direct trans-boundary consequences require open consultations involving government, commercial, and civil society stakeholders of the directly affected jurisdictions.
26. It is the legal existence of the railway right-of-way (ROW) itself that is most critical to Moose and its international investment syndicators. This irreplaceable connection of the National Capital Region, spanning territories in Québec and Ontario, with La Pêche, Chelsea and Gatineau Park, is a significant part of our interprovincial railway development proposal initiated with the Agency on 29 June 2016.
27. Moose, its investment syndicator, and the international consultant teams currently involved, are aware that rehabilitation of the Maniwaki Subdivision will require overhauled drainage systems, land stabilization, and complete re-installation of rail, ties, turnouts, crossing protection signals, culverts and in some cases minor realignment of the rail right-of-way. In broad terms, the entire current track infrastructure is obsolete for current-generation passenger rail applications, and is incapable of handling modern train weights, dynamics and performance. The track is currently composed rail that varies between 80lb and 100lb (on newer rebuilt sections) while current standards are 115lb minimum. However premature removal of the track, combined with the sort of small budget that can be expected for creating a neighborhood trail, may increase the risk of instability in the berm and substrate, and significantly increasing the costs of refurbishment that Moose of planning for its resumption of interprovincial passenger rail service on this line.

28. In a letter to Moose Consortium Inc. dated 24 February 2017 (File No. OP-014-0355-001/M00007, Case No. 16-03348), the Agency replied to the company's 29 July 2106 application for a certificate of fitness by outlining additional information that Moose should assemble in order to "refile an application, at a future date, when it is in a position to submit a complete application". The Agency specified that in addition to describing the future plan to operate a railway and arranging adequate liability coverage for the proposed construction and operations, Moose should complete the essential feasibility and planning studies, assemble its capital and operational funding, demonstrate that it will be in a position to lease the railway assets and equipment necessary to operate the proposed railway, will have in place the necessary agreements to commence operations.
29. On 1 July 2017 Moose Consortium Inc. exchanged letters of intent with LeMine Investment Group and Consortia N.A. Ltd. (LeMine-Consortia N.A.) to fully finance, in stages, the planning, development and operation of a private-sector 400 km metropolitan-scale passenger rail service for Canada's Greater National Capital Region. The companies are presently drafting terms of reference for Opus International Consultants Limited to coordinate the technical feasibility study, and for a global office of one of "the big four accounting firms" to coordinate the financial feasibility study. (The selected accounting firm has committed to undertake the work, but it will not be publicly identified until later in August 2017. References are available presently to the Agency on a confidential basis.)
30. The Municipality of Chelsea, in asserting its intention to dismantle the railway as soon as possible, has articulated no compelling public interest reason to oppose the financially self-sufficient redevelopment by other parties of an interprovincial passenger rail service upon the Maniwaki Subdivision. The municipality's only publicly declared purpose is to develop a neighborhood pedestrian and cycling pathway, for which it currently has no funding. Moose Consortium is not opposed to development of a neighborhood trail, in fact the company's plan features rails-~~with~~-trails enhancements along the entire Maniwaki Subdivision, as a practical approach to removing the inclination that some in the general public may have to walk on the railway tracks in populated areas.
31. If the Municipality of Chelsea is permitted to dismantle the Maniwaki Subdivision within its territory at the same time as the merits of this present complaint are being considered by the Agency, then the Agency may again find itself exercising its authority only after irreparable harm is done, as recently occurred in Case No. 17-01156 involving the City of Ottawa.
32. Therefore Moose asks that, pursuant to Section 28 (2) of the Act, the Agency take steps immediately to issue an interim order for the Municipality of Chelsea, and all related parties acting as agents or representatives or all bodies having a contract or agreement with the Municipality of Chelsea, refrain from dismantling any railway structure of the Maniwaki Subdivision, pending:
- 32.1. A Section 32 Review of previous decisions and orders by the Agency with regard to this railway, resulting in clarification relating to jurisdiction and ownership;
- 32.2. Completion of the studies that the Agency staff described to Moose Consortium Inc. for its pending re-submission of an application for a certificate of fitness to develop an interprovincial railway undertaking that would include this railway work;
- 32.3. Agency review of Moose Consortium Inc.'s re-submitted application for the aforementioned certificate of fitness.

Other Federal-Level Interests in This Railway

33. "Capital Arrivals" is an official designation of the National Capital Commission to refer to "major routes (highways, railways, navigable waterways) to and from the Capital within the National Capital Region". The NCC's "Capital Urban Lands Plan" states on page 59: "Capital Links also include the main access routes into the Capital. ... These routes provide views and vistas worthy of protection. The passenger railway routes entering the Capital, the region's international airport and the Airport Parkway are also Capital Arrivals. ... Generally, these facilities are not under the ownership or management of the federal government and require coordinated partnerships to support improvements."
34. The Plan for Canada's Capital 2017-2067 states: "Capital arrivals and gateways require a cohesive Capital brand and exceptional design, and the NCC will work with its partners to achieve these aims; well-designed visitor orientation and information is an important factor in making the Capital Region an excellent destination. The NCC focuses on mobility as fundamental to the Capital experience, providing opportunities to enjoy and explore the diversity of natural and built environments and landscapes in the region. ... The NCC will collaborate with the cities, transport authorities and various community groups in the Capital Region to continue the development of multi-modal and interprovincial connections and better transit integration."
35. The Maniwaki Subdivision is not presently listed by the NCC amongst the "Capital Arrivals", since it is currently out of service. However "The Plan for Canada's Capital, 2017-2067" published on 9 May 2017 by the NCC references the "Interprovincial Transit Strategy" published by the NCC, Ottawa & Gatineau from 2013, and commits the federal government to "prepare for the projected population increase to beyond 2 million by 2067 and the increasing pressure of development outside the Greenbelt and on the flanks of Gatineau Park". The railway through Chelsea is close to Gatineau Park along most of its length. The NCC's new 50-year plan encourages stakeholders and authorities "to ensure that air, rail and bus facilities and linkages are state-of-the-art, designed to offer a pleasing and welcoming arrival, and signal entry to the capital of Canada".
36. It should also be mentioned that the railway through Chelsea is over 40 years old and has been an integral part and character-defining element of a unique cultural landscape of the National Capital Region. Therefore as per the Standards and Guidelines for the Conservation of Historic Places in Canada (Parks Canada, 2011), this railway line should be evaluated for heritage value, with the potential to be designated as such under Municipal or Provincial legislation.

Current Investment Plans Face Irreparable Harm Should the Agency Not Act on This Complaint


37. MOOSE Consortium Inc. is presently collaborating with LeMine Investment Group and Consortia N.A. (LeMine - Consortia N.A.) which specialize in setting up international financing for high-quality Canadian projects. MOOSE Consortium is, from the finance perspective, a 100 km² real property value optimization project, for which the 400 km passenger rail service (equal to that of Toronto's private GO Transit system) is the primary method.
38. If results of the initial technical and financial feasibility studies are positive, the companies will complete all the required analysis, planning, agreements, approvals and market outreach. The aggregate amount currently budgeted for feasibility and planning studies is \$10M. Initially about \$500M in new private sector infrastructure investment is foreseen in the Greater National Capital Region's existing railway infrastructure, including \$50M to rehabilitate the Prince of Wales Bridge, about \$60M each for rehabilitating the railways to La Pêche, Arnprior and Bristol, and about \$30M each to upgrade the line to Montebello, as well as to add more passing tracks to VIAs Smiths Falls and Alexandria lines. The companies would also invest about \$400M in core equipment, maintenance facilities, and a rapidly-deployable modular start-up station system. Later extensions to Kemptville,

Carleton Place, Aylmer and Buckingham, and ongoing enhancements such as double-tracking for selected high-traffic sections, as well as a longer-term strategy for incremental electrification, are under discussion with stakeholders.

39. Aggregate new private investment that will be stimulated in real property development within the 0.8km radius around the approximately 50 participating stations throughout the region (i.e. 100 square km in total) is currently estimated to be about \$10B.
40. If the railway through Chelsea is lost as a railway right-of-way, there will be three negative socio-economic consequences:
- 40.1. La Pêche and Chelsea will be prevented from participating in any regional passenger railway network, which will restrict their employment, investment, tourism and social opportunities
- 40.2. The National Capital Region will lose the only railway that provides access to the Gatineau Hills, including proximity to Gatineau Park. Loss of this entire sector of the region would significantly undermine the overall attractiveness of any National Capital Region passenger rail project, because reducing people's dependence upon cars effectively depends upon whole-region access by train.
- 40.3. There exists no other route that is physically possible for a railway in the Gatineau Hills sector of the National Capital Region.
41. Moose asks that, pursuant to Section 5 of the Act, the Agency take into account current commercial developments and public interest in re-development of this railway.

C.C.

Respectfully submitted,



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Accompanying Documents:

- 1887 Act of Parliament Relating to the Ottawa and Gatineau Valley Railway
- 1894 Act of Parliament Relating to the Ottawa and Gatineau Valley Railway
- 1986 CP Letter of Agreement with Hull, Hull Ouest and La Pêche (1986-07-02)
- 1987 CP Declaration of Donation to Hull, Hull Ouest and La Pêche (1987-01-15)
- 1993 Projet de loi 244 (Loi concernant la Compagnie de chemin de fer de l'Outaouais, Assemblée Nationale, 34ième législature, deuxième session, 1993, chapitre 102)
- 2016 Agency Staff Letter to Moose RE: Maniwaki Subdivision (2016-21-07)
- 2017 Moose Affidavit, KEHOE-v-CHELSEA, Québec Superior Court (2017-07-20)