

PROJECT P2: ROCK ISLAND CONNECTION

FY 2024-2025 NRP-FSP Application

Project Narrative

LEAD APPLICANT NAME

Illinois Department of Transportation

JOINT APPLICANT NAME

Not applicable

AMOUNT OF FSP PROGRAM FUNDING REQUESTED UNDER THIS NOFO

\$ 383,976,978

AMOUNT OF PROPOSED NON-FEDERAL SHARE

\$ 95,994,245

SOURCE(S) OF PROPOSED NON-FEDERAL SHARE

Illinois Department of Transportation, Metra, Cook County - Dept. of Transportation & Highways, City of Chicago - Dept. of Transportation, Amtrak, Freight Railroads

AMOUNT OF OTHER FEDERAL FUNDING, IF APPLICABLE

N/A

SOURCES OF OTHER FEDERAL FUNDING, IF APPLICABLE

N/A

TOTAL PROJECT COST

\$479,971,223

CAPITAL COST ESTIMATE

\$518,784,515

TOTAL COST BY LIFECYCLE STAGE(S) FOR WHICH FUNDING IS REQUESTED UNDER THIS NOFO (LIST EACH LIFECYCLE STAGE AND COST SEPARATELY)

Development (Project Planning/Development) - \$10,477,142
 Implementation (Final Design) - \$28,336,150
 Implementation (Construction) - \$479,971,223

IS RIGHT OF WAY ACQUISITION (ROW) PART OF THIS FUNDING REQUEST?

No

CITY(IES), STATE(S) WHERE THE PROJECT IS LOCATED

Chicago, IL

CONGRESSIONAL DISTRICT(S) WHERE THE PROJECT IS LOCATED

Illinois Congressional Districts 1 & 7

GEOSPATIAL DATA FOR PROJECT LOCATION(S) IN DECIMAL DEGREES

Western limits: 41.757919, -87.648866 degrees;
 northeastern limits: 41.763630, -87.634453 degrees;
 southeastern limits: 41.754914, -87.637778 degrees

CURRENT LIFECYCLE STAGE OF PROJECT AT TIME OF APPLICATION

Implementation - Final Design / Construction. The project in its final design stage.

ANTICIPATED COMPLETION DATE OF CURRENT LIFECYCLE STAGE

If awarded FSP funding for construction, final design will be completed in Q2 2027

APPLICATION LIFECYCLE STAGE PROPOSED TO BE FUNDED BY THIS NOFO

Implementation - Final Design & Construction. FSP funding will specifically go toward construction work

EXISTING INTERCITY PASSENGER RAIL SERVICES(S) ON ROUTES NOT MORE THAN 750 MILES BENEFITTING FROM THE PROJECT

(1) Chicago to Carbondale; (2) Chicago to Grand Rapids; (3) Chicago to Port Huron; (4) Chicago to St. Louis; (5) Chicago, Fort Wayne, Columbus, and Pittsburgh; (6) Chicago to Moline; (7) Indianapolis to Chicago; (8) Peoria to Chicago; (9) Detroit/Pontiac to Chicago

IF APPLICABLE, EXISTING LONG-DISTANCE SERVICE(S) ON ROUTES GREATER THAN 750 MILES BENEFITTING FROM THE PROJECT

(1) Amtrak Cardinal (Chicago to New York)

IF APPLICABLE, EXISTING COMMUTER RAIL SERVICE(S) BENEFITTING FROM THE PROJECT

Metra Commuter Rail – SouthWest Service

IF APPLICABLE, WHAT CORRIDOR AS IDENTIFIED IN FY 2022 CID SELECTIONS IS BENEFITTING FROM THE PROJECT

(1) Chicago to Moline (2) Chicago, Fort Wayne, Columbus, and Pittsburgh; (3) Indianapolis to Chicago; (4) Peoria to Chicago; (5) Detroit/Pontiac to Chicago; (6) Chicago to Carbondale; (7) Chicago to Grand Rapids; (8) Chicago to Port Huron; (9) Chicago to St. Louis; (10) Amtrak Cardinal (Chicago to New York)

HOST RAILROAD/INFRASTRUCTURE OWNER(S) OF PROJECT ASSETS AND PROPERTY

Metra Commuter Rail, Belt Railroad of Chicago (BRC), Norfolk Southern (NS)

OTHER IMPACTED RAILROAD(S)

Not applicable

TENANT RAILROAD(S), IF APPLICABLE

BNSF, CN, CPKC, CSX, NS, UP, CSS, Amtrak, Metra

IF APPLICABLE, IS A 49 U.S.C. 22905-COMPLIANT RAILROAD AGREEMENT EXECUTED OR PENDING?

Pending

LOI/PFA REQUESTED?

No

PROJECT NARRATIVE

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II. Project Summary

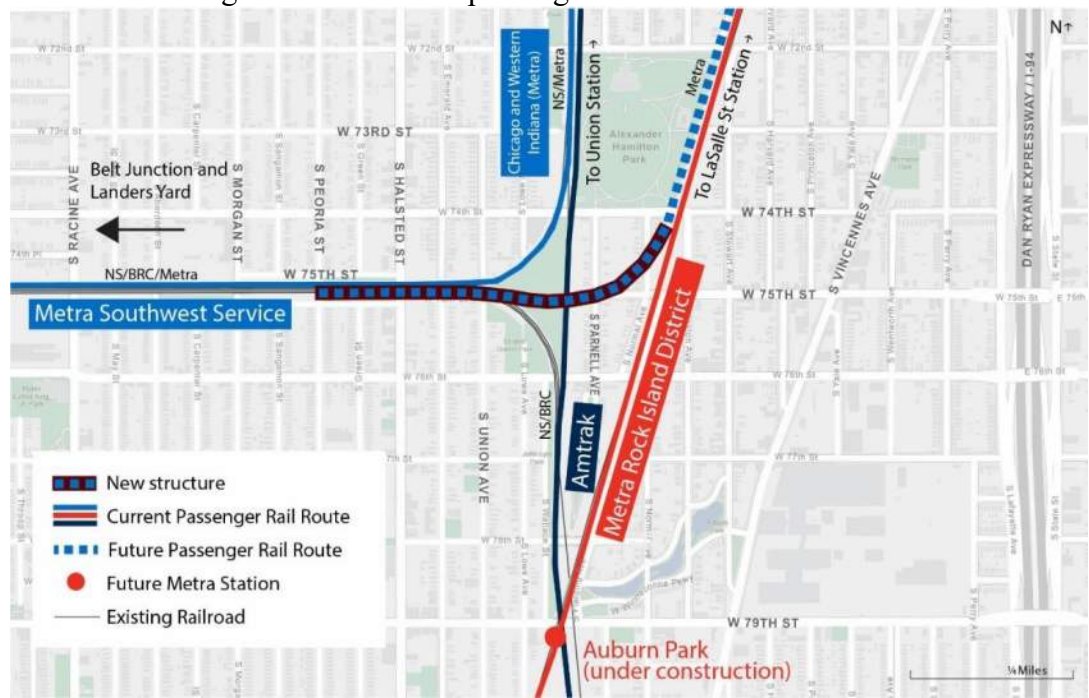
The Illinois Department of Transportation (IDOT), as lead applicant and partner in the Chicago Region Environmental and Transportation Efficiency (CREATE) Program—the nation’s largest public-private rail partnership—seeks funding to advance the Rock Island Connection Project (P2). This next phase of the [75th Street Corridor Improvement Project](#) (75th St CIP), now in final design, will construct a flyover bridge to eliminate a major chokepoint—[Belt Junction](#)—**reducing freight and passenger train conflicts**. IDOT requests 80% federal funding for the \$479,971,223 construction project, with the remaining 20% provided by CREATE’s public and private partners.

P2 supports the goals of the National Railroad Partnership Program / Federal-State Partnership for Intercity Passenger Rail Grant Program (NRP-FSP) by **improving performance and safety** in the nation’s most congested rail terminal. The corridor carries 90 daily freight trains, six weekly Amtrak *Cardinal* trains (98,583 annual riders)¹, and 30 weekday Northeast Illinois Regional Commuter Rail Corporation (d.b.a. Metra) SouthWest Service (SWS) revenue trains (976,376 annual riders)². Shared operations and passenger train prioritization cause delays of up to six hours daily, particularly affecting access to Norfolk Southern’s (NS) Landers Intermodal Facility, which handled 352,775 lifts in 2024³.

Chicago Union Station (CUS), Amtrak’s busiest station and a major Midwest passenger rail hub, connects 17 intercity routes and serves nearly 17 million passengers yearly. P2 will reroute 30 weekday Metra SWS revenue trains from CUS to LaSalle Street Station, reducing freight conflicts, and **enhancing intercity passenger rail service for traveling families**, including Amtrak *Cardinal* riders between Chicago and New York via Philadelphia, Washington D.C., Charlottesville, Cincinnati, and Indianapolis.

The P2 flyover will remove severe chokepoints, **reduce the state of good repair backlog**, and improve efficiency, reliability, and safety for commuter, intercity passenger, and freight rail within Chicago, the nation’s premier freight hub—handling nearly half of all U.S. intermodal units and one-third of rail cars—delivering measurable benefits to freight movement and passenger service.

Figure 1. P2 Flyover Map
 (see [Exhibit 1A](#) for larger view)



¹ Amtrak Fiscal Year 2025 ridership, [Amtrak Route Ridership \(FY 25 vs. FY24\)](#)

² Metra 2024 ridership, [Regional Transportation Authority Mapping and Statistics - Metra Total Rail Ridership By Line \(2024\)](#)

³ [Exhibit 3A. CMAP Facility Lift Counts](#)

III. Project Funding

The total FY 24-25 NRP-FSP grant request is **\$383,976,978**, 80% of the P2 construction cost of \$479,971,223. The initial cost estimate was developed in April 2023 through USDOT’s Cost and Schedule Risk Assessment process, and CREATE partners updated it in October 2025 with revised cost information and contingencies. Construction costs are based on 2026 estimates and are escalated for inflation through 2030, the project’s mid-point construction year.

Without NRP-FSP funding, P2 project will face indefinite delays, preventing completion of other 75th St CIP segments and leaving Belt Junction—the nation’s most congested rail chokepoint—unresolved. As shown in the [P2 Detailed Project Schedule](#), P2 final design has advanced to support a reliable cost estimate.

Non-federal matching funds are committed and have been secured by the CREATE Partners, including IDOT, Metra, Cook County Department of Transportation & Highways (CCDOH), City of Chicago (COC), Amtrak, and Freight Railroads. These funds have no obligation or expenditure deadlines. **Table 1** presents the requested NRP-FSP amount and non-federal contributions by state, local, private, and other sources. A funding commitment letter is available on the [application website](#).

Table 1 also details project cost allocations by task name/project component for each major construction activity, derived from [Exhibit 2B. 75th St CIP Annual Financial Plan](#) and [Exhibit 2C. 75th St CIP Cost and Schedule Risk Assessment](#).

Table 1: Project Funding Overview for Implementation Lifecycle Stage (Construction)

Task #	Task Name / Project Component	Cost	% of Total	Source of Funds and Citation, as applicable
1.0	Removals / Demolition	\$3,450,765		
2.0	Civil - Earthwork	\$17,643,236		
3.0	Track work	\$27,629,262		
4.0	Signals & Systems	\$27,000,000		
5.0	Structures	\$208,335,100		
6.0	Viaducts	\$1,924,515		
7.0	Environmental Mitigation	\$10,992,125		
8.0	Miscellaneous & Temporary Facilities	\$22,600,000		
9.0	Utility	\$7,000,000		
10.0	Professional Services	\$43,022,417		
11.0	Unallocated Contingency	\$110,373,803		
Total Project Cost		\$479,971,223		
Federal NRP-FSP funding requested in this application		\$383,976,978	80.0%	Federal NRP-FSP
Non-Federal Funding		Cash: \$95,994,245	20.0%	See below
Non-Federal Funding (State)		Cash: \$28,994,245	6.0%	IDOT
Non-Federal Funding (Private Sector)		Cash: \$10,000,000	2.1%	Freight Railroads
Non-Federal Funding (Local - Metra)		Cash: \$30,000,000	6.3%	Metra
Non-Federal Funding (Local - CCDOH)		Cash: \$10,000,000	2.1%	Cook County
Non-Federal Funding (Local - COC)		Cash: \$2,000,000	0.4%	City of Chicago
Other Non-Federal Funding		Cash: \$15,000,000	3.1%	Amtrak
Other Federal funding Committed and pending		NA	0%	NA

The construction budget includes a 10% contingency and 5% Project Management Reserve (PMR) for construction, plus a 10% contingency for professional services, captured under Unallocated Contingency, which also accounts for inflation. Additional information is provided in [Exhibit 2A. Estimates and Contingency Plan](#), [P2 Detailed Cost Estimate](#) and [P2 Cost Estimate Narrative](#).

The Lifecycle Costs provided in **Table 2** are delineated by IDOT’s three project phases. IDOT Phase I Preliminary Engineering and Environmental Studies for 75th CIP, which includes P2, are complete. They incorporate all aspects of FRA’s Lifecycle Development Stage (Project Planning and Project Development). IDOT Phase II Final Engineering is underway, land acquisition has been identified and fully funded as part of FRA’s Implementation Stage (Final Design). FHWA funds shown as Federal under Phase II Final Design and Right-of-Way in **Table 2** along with CREATE Partners contributions are supporting land acquisition and relocation services through the FY 2023 Illinois Competitive Freight Program grant. **This NRP-FSP request applies exclusively to construction activities within FRA’s Implementation Stage (Construction)**, which IDOT defines as Phase III.

Table 2: Lifecycle Project Cost & Funding

Cost Categories	Federal	Non-Federal	Total
Phase I Planning, NEPA & Preliminary Engineering for 75 th CIP (Completed)	\$0	\$10,477,142	\$10,477,142
Phase II Final Design (Underway and Fully Funded) & Right-of-Way (Identified and Fully Funded)	\$3,780,000	\$24,556,150	\$28,336,150
Phase III Construction (<i>This NRP-FSP request</i>)	\$383,976,978	\$95,994,245	\$479,971,223
Total:	\$387,756,978	\$131,027,537	\$518,784,515

As shown in **Table 2**, the total project lifecycle cost exceeds \$500 million. With over \$100 million in requested federal assistance with this grant application, P2 qualifies as a Major Capital Project (see **Section 12.5 Major Capital Projects**). **Table 3** presents the annualized, year of expenditure budget being requested through this grant application. A detailed cost estimate, schedule, risk assessment and project management plan are available on the [application website](#).

*Table 3: Annualized Construction Budget**

Funding Source	Projected Expenditures						
	2028	2029	2030	2031	2032	2033	Total
NRP-FSP	\$7,679,540	\$92,154,475	\$92,154,475	\$92,154,475	\$92,154,475	\$7,679,538	\$383,976,978
Non-Federal	\$1,919,885	\$23,038,619	\$23,038,619	\$23,038,619	\$23,038,619	\$1,919,884	\$95,994,245
Total	\$9,599,425	\$115,193,094	\$115,193,094	\$115,193,094	\$115,193,094	\$9,599,422	\$479,971,223

* Year represents Federal Fiscal Year.

The State submitted a previous application for FY 2024 FSP Program grant, for which the NOFO was withdrawn on September 22, 2025. This NRP-FSP application incorporates relevant information from the FY 2024 FSP submission, along with updated information—including revised partner contributions, added private sector funding, updated grant request, and refined lifecycle stage costs reflecting updated

engineering estimates and inflation. The CREATE Partners are not seeking federal construction funds for more than 80% requested through this application.

IV. Applicant Eligibility

The applicant meets the eligibility requirements in 49 U.S.C. 24407(b)(8). IDOT is the lead applicant, a CREATE partner, and a unit of state government authorized under [20 ILCS 2705](#) to carry out programs and policies authorized and funded by the Illinois General Assembly. IDOT's DUNS number is 1336007540000. The application contact is:

Jason Osborn

Director, Office of Intermodal Project Implementation, Illinois Dept. of Transportation
312-793-2116 (o), Jason.Osborn@illinois.gov

As lead applicant, IDOT will serve as the fiduciary recipient and grant administrator for NRP-FSP funding. Each CREATE project is managed by a sponsor overseeing procurement, engineering, and construction. For P2, the sponsor is IDOT, and the contracting entities are Metra, NS, and Belt Railway Company of Chicago (BRC). P2 will realign tracks and construct a flyover to create a grade separation between Metra, NS and BRC. P2 will continue to follow all federal guidelines through final design and construction, with IDOT coordinating closely with affected railroad owners, operators, funding partners, and local communities. The CREATE Program Management Office of the Association of American Railroads (AAR) will support project delivery and oversight, representing the interests of CREATE's member railroads. FHWA is the oversight agency for the project's NEPA documentation and FRA will verify that the NEPA documentation has been approved by a federal agency.

V. Project Eligibility

P2 is eligible for NRP-FSP (NOFO Sec. 3(d)(ii)) as a **project to improve intercity passenger rail service performance**. The Amtrak *Cardinal* route, which traverses the Project area, is included in the FRA's Corridor ID Program. The route carries over 98,583 riders annually, providing critical intercity passenger rail service between New York Penn Station and Chicago Union Station. The *Cardinal* is the only intercity rail option for passengers from Indianapolis, Cincinnati, and Charleston in West Virginia to directly connect with major metropolitan areas such as Washington, D.C., Philadelphia, New York, and Chicago, supporting mobility, economic development, and access across multiple states. Since Amtrak shares tracks with 30 Metra revenue trains and two freight trains daily, with additional unscheduled movements, the *Cardinal* service is constrained and often subject to delay. Completion of this Project to reroute Metra's 30 weekday SWS revenue trains will allow for more efficient movement of Amtrak and freight rail trains on the Chicago and Western Indiana (CWI) line (owned by Metra north of project from W 74th St to Control Point [CP] 21st Street near 23rd Place) as well as help enable Amtrak and its state sponsors to make the *Cardinal* a daily train as planned in FRA's Corridor Identification Program.

VI. Corridor Identification Program Coordination

Of the 69 corridors selected for the inaugural round of the FRA Corridor Identification (CID) program, at least 16 could result in new or enhanced service to and from Chicago. Ten of these 16 CID projects rely on track improvements and increased service frequency within the "Midwest Core" vicinity. P2 will support the Midwest Core Study and the ten active CID studies (**Figure 2**) focused on new or improved passenger rail routes to CUS's south concourse, including the *Cardinal* and proposed Chicago to Indianapolis services. Amtrak supports P2 (see [Support Letter](#)), as it will help enable increased *Cardinal* frequency. Investments are essential to meet current mobility needs and ensure reliable future services

traveling through CUS.⁴ While the exact number of additional daily train slots and the timing required at CUS will not be known until at least CID Step 2 for each project, early Step 1 estimates for the Midwest Region indicate a need for roughly 32 additional daily trains to CUS's south concourse.⁵ Rerouting Metra SWS trains to LaSalle Street Station though P2 construction will free 30 daily slots at CUS, unlocking the capability to implement the FRA Midwest Regional Rail Plan and the 10 passenger rail services listed below.

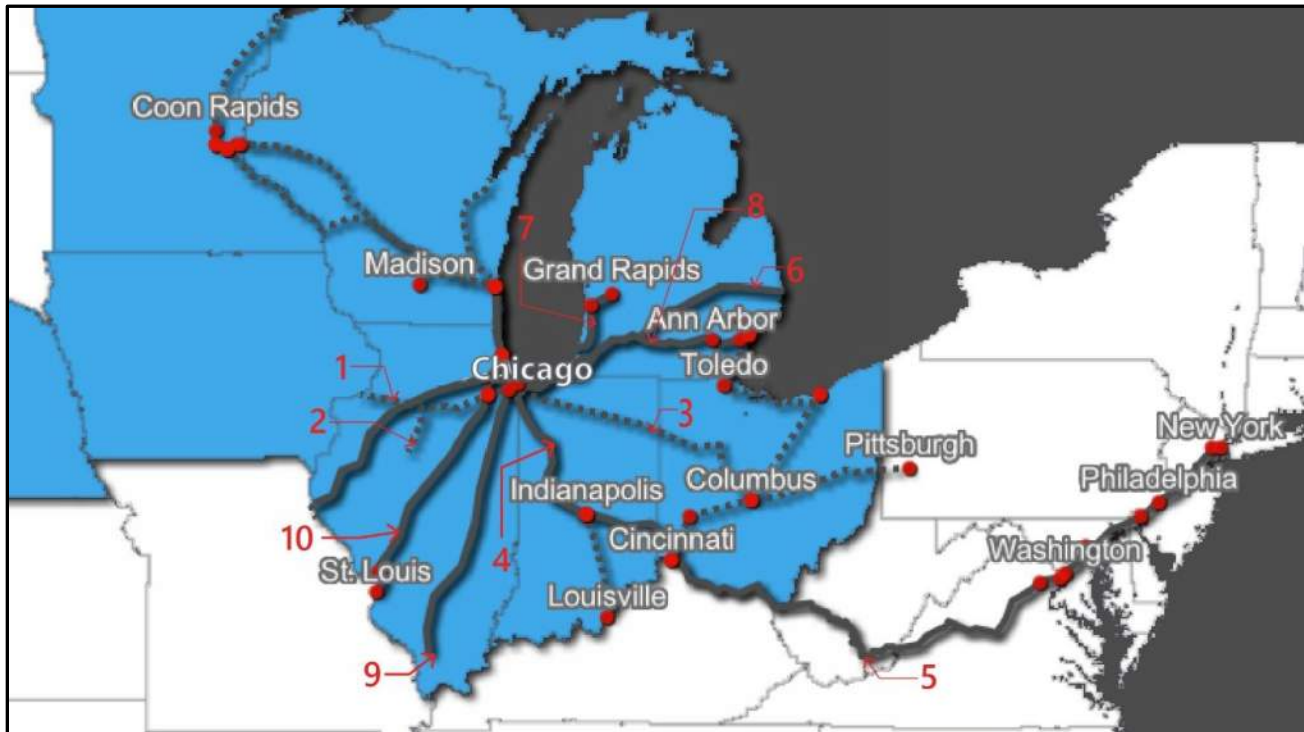
New Conventional Service

1. Chicago to Quad Cities Service Extension Program (Chicago to Moline) - new service
2. Chicago to Peoria - new service
3. Midwest Connect (Chicago, Fort Wayne, Columbus, and Pittsburgh) - reinstate service
4. Chicago to Indianapolis – new State Supported service on same route used by the *Cardinal* Service

Increased Frequencies on Existing Routes

5. *Cardinal* Service (New York-Chicago) - increase from six weekly trains to 1 daily round trip
6. Blue Water (Chicago-Port Huron) - increase from 1 to 2 daily round trips
7. Pere Marquette (Chicago-Grand Rapids) - increase from 1 to 2 daily round trips
8. Wolverine (Chicago-Detroit/Pontiac) - increase from 3 to 6 daily round trips
9. Chicago to Carbondale - increase from 2 to 4 daily round trips
10. Chicago to St. Louis - increase from 4 to 8 daily round trips

Figure 2. Corridor Identification Development Program – Midwest Region (see [Exhibit 1F](#) for larger view)



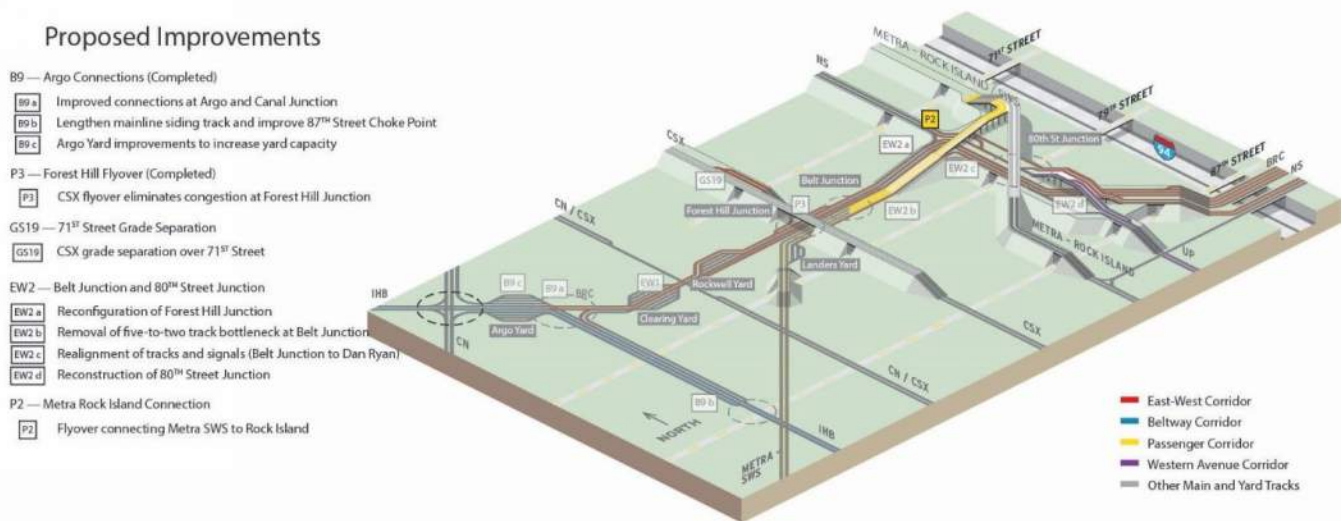
⁴ [Amtrak Media - Amtrak and Midwest Partners Celebrate Federal Grants to Improve and Expand Passenger Rail in the Chicago Hub \(Dec 8, 2023\)](#).

⁵ Information provided by CID Sponsors (January 2026).

VII. Detailed Project Description

To support this application, a narrated video was developed highlighting current operating conditions of the 75th St CIP and future elements of P2 construction: [75th St CIP CREATE P2 Project](#). P2 will construct a flyover near W. 75th Street and S. Parnell Avenue (**Figure 3**) to connect Metra’s SWS with the Rock Island District (RID). This project will reconfigure BRC, NS and Metra tracks and grade separate BRC and Metra tracks, enabling SWS trains to reroute to LaSalle Street Station, relieving train congestion in the Project area and at CUS for future Amtrak service as detailed in **Section VI. Corridor Identification Program Coordination**. The rerouting also reduces conflicts with Norfolk Southern freight and Amtrak operations on the Metra CWI line north of the project area.

Figure 3. 75th St CIP Isometric Map – P2 Breakout (see [Exhibit 1B](#) for larger view of existing and proposed conditions)



The project includes constructing a second main track for SWS operations from Morgan Street to the Rock Island District connection at 75th Street, which will later extend westward beyond Wrightwood Station as part of subsequent EW2 segments. P2 builds on prior 75th St CIP work, eliminating rail conflicts and improving travel time, safety, and infrastructure reliability along the corridor.

7.1. Project Scope

P2 is a component of the greater 75th St CIP. P2’s scope was developed to have independent utility as a standalone project, as well as enable future projects that depend on its construction. P2’s scope as shown in [Exhibit 1C. P2 Schematic and Staging Overview](#), includes the following components:

- Track Work:** East of Belt Junction, tracks will be reconfigured to six lines, grouped into three alignments. The first alignment group includes three BRC tracks (the northernmost tracks) established in EW2A, while the second alignment includes two new Metra tracks relocated to the south, and the third alignment is the new NS Landers Main as the southernmost track. The two Metra tracks (Alignment 2) rise from an existing grade of 0.35% to a near 2% grade west of the Peoria St. Bridge, crossing over the three BRC tracks near the existing Union Ave. Bridge. The three BRC tracks (Alignment 1) remain at their current grade, as they curve to the southeast using an approximately 5-degree 45-minute curve toward 79th Street to the south. The two new Metra tracks connect to Metra’s RID tracks using #20 turnouts near 75th Street and S. Parnell Avenue and facilitate necessary train movements to continue to LaSalle Street Station. In total, nearly 4,200 feet of double track will be

constructed, along with four #20 crossovers. A temporary shoofly will be constructed for the bridge improvements at 73rd and 74th St.

To support P2 improvements including the realignment of BRC tracks and the NS Landers Main, NS will implement track enhancements along the 75th St. east-west corridor, spanning Western Ave. and Union Ave., and the north-south corridor between 74th St. and 78th St. This includes the construction of approximately 8,200 feet of new track. Furthermore, approximately 19,600 feet of track will be shifted with 33% timber crosstie renewal and ballast renewal. Four new power operated turnouts and five new power crossovers will facilitate a fully automated, dispatcher-controlled path.

- **Structures Work:** The P2 flyover structure begins at the west along the Metra SWS tracks, between Peoria and Halsted Streets, rising to its maximum height over the BRC tracks near Union Ave. From there, it descends along a curve to the northeast, where it meets the existing Metra RID tracks, near Hamilton Park and 74th St. (as depicted in **Figure 4**). The flyover structure is designed for Cooper E-80 loading and meets or exceeds the minimum vertical clearance of 23'-0" over railroads and 14'-9" over roadways. The overall flyover structure length, including retaining walls, is around 4,616 feet. Superstructures include: (1) steel deck plate girder spans with reinforced concrete decks over Peoria St. and Halsted St.; (2) a curved flyover structure with transverse steel floor beams and a reinforced concrete deck over the BRC tracks; (3) a steel thru plate girder span over the NS tracks; and (4) steel deck plate girder spans with reinforced concrete deck at Normal Ave. Between the steel spans are Polyester Polymer Concrete (PPC) beam spans of varying length, supported by reinforced concrete piers and abutments, built on deep foundations. Each structure end consists of cast-in-place concrete walls, built on deep foundations at the east end.

In addition, NS will install about 3,170 feet of new retaining walls from Aberdeen St to the east of Union Ave to support both the new track and the P2 flyover's western approach spans, along with about 1,720 feet of noise barriers. The abutments at Peoria and Halsted Streets will extend to the south by about 25 feet with a new superstructure to accommodate the installation of the NS Landers Main.

Figure 4. Rendering of Proposed P2 Flyover Bridge (north-facing view) (see [Exhibit 1E](#) for larger view)



- **Signals Work:** New switches, signals, and bungalows will be added at seven distinct locations on the existing and newly constructed segments along the corridor.
- **Community Mobility Improvements:** Chicago Department of Transportation (CDOT) will implement various street improvements at six viaduct locations—73rd Street, 74th Street east of Normal

Avenue, Normal Avenue north of 75th Street, 75th Street at Normal, Halsted Street, and Peoria Street—along the corridor and within the surrounding neighborhoods up to one-quarter (1/4) mile from the railroad work. Improvements including ADA ramps, LED lighting fixtures, sidewalk and pedestrian enhancements, pavement replacement, sewer upgrades, and landscaping will improve safety and useability for pedestrians, motorists, commercial vehicles and families walking and driving below the railroad bridges. At the 73rd Street viaduct, upgrades will also improve the pedestrian tunnel under the Metra RID to provide enhanced access to Hamilton Park from the east.

7.2. Project Schedule & Lifecycle Stage

As detailed in **Section 10.1. Project Readiness**, FRA’s Systems Planning Stage for P2 was completed through the CREATE Program’s Final Feasibility Plan, a feasibility study defining the costs, impacts, and development activities for all 70 Program projects—including P2—and serves as a Tier I Environmental Impact Statement (EIS). The Final Feasibility Plan was completed in 2007, and last modified in 2011.

Following the Final Feasibility Plan, CREATE Projects advance through IDOT’s three project phases: Phase I Preliminary Engineering and Environmental Studies, Phase II Final Engineering, and Phase III Construction. IDOT’s Phase I encompasses all elements of FRA’s Lifecycle Development Stage—Project Planning and Development—which were completed for P2 with the approval of the 75th St CIP [Final EIS \(FEIS\)](#) and [Record of Decision \(ROD\)](#) in 2014, followed by preliminary design approval in 2015.

IDOT’s Phases II and III correspond to FRA’s Implementation Stage, covering Final Design and Construction. P2 final design is fully funded and began in 2020. Phase II includes track and bridge design as well as land acquisition needs and real property interests (ROW, fee, and easements). Final design is currently underway with the Final Design Report scheduled for approval in Q2 2027 as shown in **Figure 5**. Land acquisition needs and real property interests to be acquired from private property owners have been identified and are expected to be completed by Q2 2027. P2’s detailed project schedule and narrative are available on the [application website](#). Construction will commence with bid procurement in Q3 2027, followed by construction starting in Q3 2028 and completing in Q4 2033.

Figure 5. P2 Project Schedule*

Task, Milestone, or Deliverable	2024				2025				2026				2027				2028				2029				2030				2031				2032				2033			
	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4
Track Design																																								
Bridge Design																																								
ROW Acquisition																																								
Final Design Report																																								
Grant Agreement																																								
FRA Project Management Plan																																								
Bid /Contractor Procurement																																								
Construction																																								
Community Engagement																																								

*Schedule is in calendar year.

7.3. Transportation Challenges

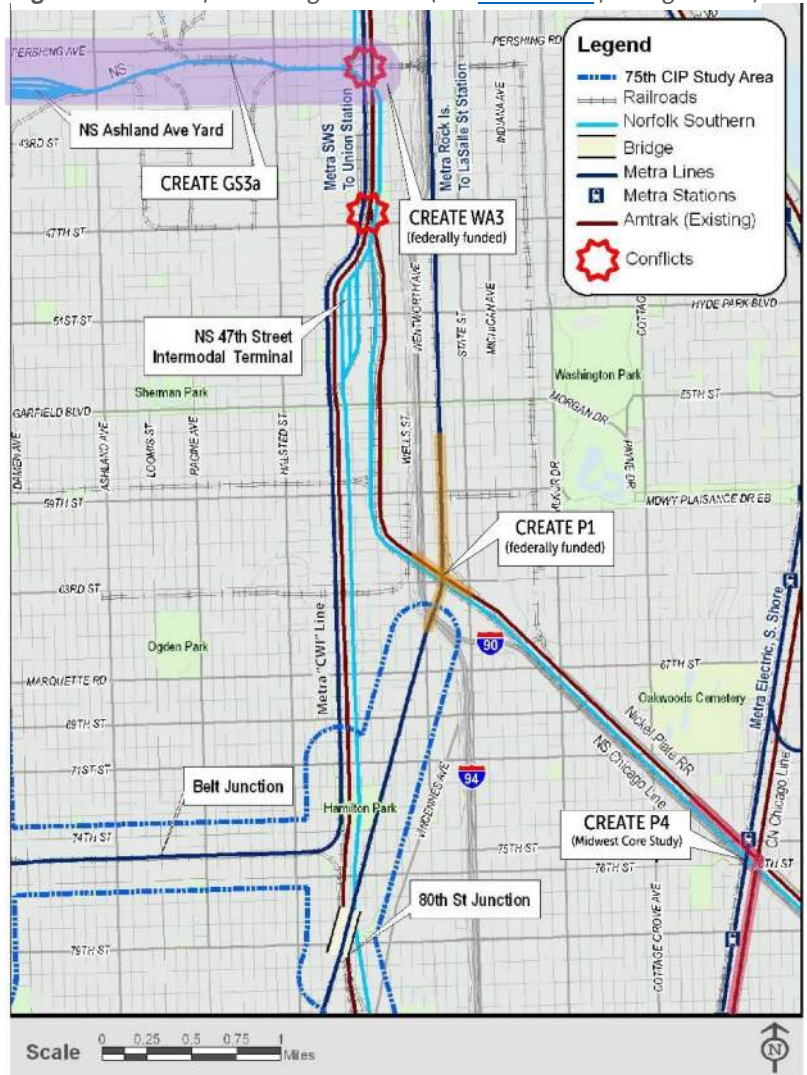
P2 addresses critical transportation challenges including rail conflicts, recurring delays, and congestion that limit Amtrak’s ability to increase service frequency and improve reliability as detailed below. P2 will build upon the success of federally funded CREATE projects including the completion of WA3 and P1, which increased freight capacity and reduced delays within the Chicago Terminal (see **Figure 6**). P2 will support the CREATE program’s mission to deliver essential infrastructure improvements to Chicago’s rail network, generating both regional and national benefits. It also aligns with ongoing evaluations of

connections at CUS through Amtrak’s Midwest Core Study and CID Program (see **Section VI. Corridor Identification Program Coordination**).

7.3.1 Eliminating Rail Conflicts and Delays

Approximately 30 Metra revenue trains and 90 freight trains cross paths each weekday at Belt Junction, creating significant passenger-freight conflict points. Additionally, conflicts exist along the Metra CWI line, north of the P2 project area where NS operations at their 47th St Intermodal Yard (handled 501,607 lifts in 2024) and Ashland Yard obstruct Metra SWS and Amtrak *Cardinal* trains accessing CUS to the north (see **Figure 6**). Freight operations are typically delayed at rail-rail conflict points to allow for prioritized Amtrak and Metra movements, and there are delays to passenger service that can result from these conflicts. By agreement between the passenger and freight railroads in the Chicago Terminal (the “Terminal”), the Chicago Protocol specifies that passenger trains always run first if there is a conflict with a freight train, exacerbating freight delay during both morning and evening peak commuting hours to allow Metra to maintain their frequency of operations.⁶ The P2 flyover will allow Metra to use the corridor without obstructions during weekday peak hours, thus substantially increasing the actual daily freight capacity of the entire corridor. Shifting Metra SWS operations to the Metra RID line from the Metra CWI line via the P2 flyover also reduces conflicts between Amtrak’s *Cardinal* and Metra’s SWS on the Metra CWI line at 74th St. On average, interference with SWS trains is responsible for 0.6 minutes of delay per Amtrak trip.⁷

Figure 6. Rail Conflicts along CWI Line (see [Exhibit 1G](#) for larger view)



7.3.2 Increasing Intercity Passenger Rail Frequency

Metra operates 30 weekday SWS passenger revenue trains to and from the south concourse at CUS, a key hub for national and Midwest passenger rail service. P2 will shift these SWS trains to the Metra RID line, which terminates at LaSalle Street Station in Chicago’s downtown instead of CUS.

The P2 improvement will enhance travel for families by enabling more frequent Amtrak service and advancing the Midwest states’ goal of improving passenger rail service on high-demand corridors identified in Corridor ID plans. This includes upgrading the Amtrak *Cardinal* service from six weekly

⁶ Chicago Train Operations Protocol Guidelines (May 21, 2023)

⁷ [75th St CIP FEIS Chapter 1 - Purpose and Need](#) (p.18)

trains to daily service and improving the feasibility of adding Chicago-Indianapolis trains as outlined in Indiana DOT's Corridor ID program.

7.3.3 State of Good Repair

Metra owns 23 double-track bridges from 74th St to 45th St and 21 single-track bridges from 43rd St to 23rd Pl—each more than a century old—along its CWI line. Given their age and condition, Metra expects all 44 bridges need replacement within the next 30 years to keep the corridor operational. These structures currently support Amtrak *Cardinal* service (six weekly trains), Metra SWS (30 weekday trains), and two daily NS freight trains, despite being owned and maintained by Metra. Construction of the P2 flyover will allow Metra SWS trains to shift to the RID, removing them from aging bridges, which have exceeded their useful life and would otherwise require costly replacement, and enabling Metra to divest from these structures.

For the single-track segment between 43rd St and 23rd Pl, Metra would be able to fully divest its single main track, as Amtrak could reroute over adjacent NS mainline tracks between CP 21st St and CP 518. In the double-track segment from 74th St to 43rd St (CP 74th St to CP 518), Metra can divest one of the two tracks due to the reduced traffic, while still accommodating Amtrak on the remaining track. Jointly developed by Amtrak, Metra, and NS, this approach improves cost efficiency and maintains effective corridor operations for both public and private rail carriers.

One full track's worth of bridge structures can be divested from service within this corridor, eliminating the need for ongoing maintenance or eventually replacement and avoiding significant O&M costs associated with those activities. As a result, P2 eliminates the need to replace single-track bridges from 74th St to 23rd Pl, representing an avoided capital cost of approximately \$248 million in 2024 dollars over the 30-year analysis period as noted in the Benefit-Cost Analysis ([BCA](#)), see page 15. This estimate reflects only the bridge replacement capital costs and does not include other substantial costs and impacts, such as increased travel times due to train reroutes or service disruptions during reconstruction.

7.3.4 Freight Rail Congestion

By 2048, the Chicago Terminal is projected to face significant freight rail capacity constraints if P2 is not constructed, leading to up to an estimated 8% of freight rail volumes traveling to and from Chicago and nearby Midwest markets diverting to trucks by 2060 ([BCA](#), p. 20). This diversion could generate more than 558 million additional vehicle miles traveled between 2048 and 2062, increasing roadway congestion and safety risks.

Without P2, rail network congestion would also prevent accommodating growing non-intermodal freight demand beginning in 2048, triggering shifts of up to 5% of non-intermodal freight traffic to alternative Class I gateways, lengthier rail routes, and higher transportation costs.

Constructing P2 would prevent the diversion of about 41 billion ton-miles of freight from 2028 to 2062, yielding an average annual savings of \$172 million in shipper costs and externalities ([BCA](#), p. 21).

7.4. Current & Proposed Railroad Operations

P2 reroutes Metra's SWS from Metra's CWI line onto the Metra RID line, delivering operational and reliability improvements for freight and passenger trains. By shifting SWS trains to a corridor owned by Metra and exclusively controlled by Metra from 74th Street to the north, P2 eliminates shared-track conflicts with freight and intercity passenger services. Metra RID runs 80 weekday revenue trains in and out of LaSalle St Station, as well as 33 revenue trains on Saturdays and 29 revenue trains on Sundays. Metra SWS runs 30 weekday revenue passenger trains at a maximum speed of 60 miles per hour (mph). Amtrak *Cardinal* service runs six trains weekly in and out of CUS, at a maximum speed of 60 mph on the

Metra CWI line north of W 74th St to CP 21st Street. Including Metra SWS and the Amtrak *Cardinal*, approximately 176 trains per day currently use the south concourse at CUS.⁸ NS operates two freight trains per day with additional unscheduled movements a few times per week on the Metra CWI line. Metra SWS trains run on a combination of NS, Metra, and BRC tracks in the current configuration of the 75th St CIP area, where freight carriers run 90 trains at a maximum speed of 25 mph through the corridor each day. Following completion of P2, Metra SWS will operate only on Metra tracks in the project area, helping enable the Amtrak *Cardinal* to provide daily service as planned in FRA’s Corridor ID Program.

7.5. Project Users & Beneficiaries

7.5.1 Direct Users

Direct users of the project area are Metra, Amtrak, six Class I freight railroads (NS, CSX, UP, CN, CPKC, BNSF), and a Class III short line freight railroad (BRC [co-owned by six Class I freight railroads]). Metra currently operates 30 SWS revenue trains on weekdays through the corridor (serving 976,376 riders in 2024),⁹ freight operators run 90 trains through the corridor daily, and Amtrak runs six weekly *Cardinal* trains (serving 98,583 riders in fiscal year 2025).¹⁰ Current operations include freight and Metra trains using the same tracks at Belt Junction per the Chicago Protocol,¹¹ with passenger trains prioritized at interlockings and joint operating locations. As a result, freight trains are curtailed at least twice daily during peak commuting hours—totaling six hours daily—and at times during off-peak periods. These constraints lengthen freight travel times and restrict available movements windows, hindering freight flows through Belt Junction and affecting operations to and from the adjacent NS Landers Intermodal Facility (352,775 lifts in 2024).¹²

P2 is needed to unlock full freight delays at Belt Junction by separating passenger and freight operations. NS trains entering and exiting Landers will benefit from reduced delay times. By shifting Metra SWS trains to the RID line, P2 will also support Amtrak’s plan to increase intercity passenger rail service at CUS—including upgrading the *Cardinal* to daily service on Metra CWI—while also reducing travel times for Metra SWS commuters and improving overall travel for families.

7.5.2 Local & Regional Beneficiaries

P2 upgrades both elevated track structures—by grade separating BRC and Metra tracks—and the city streets and pedestrian areas below. These enhancements support safer travel for the 96,023 residents of the Englewood, Auburn Gresham, and Greater Grand Crossing neighborhoods that intersect the project corridor.¹³ Travel time savings for Metra and Amtrak passengers is a primary benefit of P2. Between 2033-2062, P2’s improvements will generate about 534,063 person-hours of annual travel time savings for existing and new Metra SWS riders, valued at over \$91.3 million (BCA, p.12). Increased SWS service and ridership will also reduce auto travel and reduce negative externalities of low-occupancy automobile travel, diverting 131,193 weekday person-miles from vehicles and yielding an estimated \$84.9 million in benefits over the 30 years (BCA, p.13).

P2 also supports Chicago’s freight economy growth, a central CREATE Program goal. As part of the 75th St CIP, P2 is critical for preventing rising travel times in the Chicago Terminal that could limit capacity by 2048. Without P2, congestion could divert up to 8% of freight traffic to and from Chicago and nearby Midwest markets to trucks and reroute up to 5% of rail traffic to longer routes through St. Louis or Kansas

⁸ [Amtrak Routes & Destinations, Metra 2026 Operating Budget & Capital Program](#)

⁹ [Regional Transportation Authority Mapping and Statistics - Metra Total Rail Ridership By Line \(2024\)](#)

¹⁰ [Amtrak Route Ridership \(FY 25 vs. FY24\)](#)

¹¹ Chicago Train Operations Protocol Guidelines (May 21, 2023)

¹² [Exhibit 3A. CMAP Facility Lift Counts](#)

¹³ [Exhibit 3B. CMAP Community Profiles](#)

City by 2060 ([BCA](#), p.21). Chicago’s rail system handles \$752.5 billion of goods annually,¹⁴ including 48% of the nation’s intermodal units,¹⁵ and supports 210,000 regional freight-related jobs (2024), with over 13,000 directly employed by freight railroads¹⁶. One in every four U.S. freight trains pass through or near Chicago. Statewide, rail contributed to \$4.7 billion in household income in 2023, and Illinois’ rail network handled freight volumes equivalent to more than 23 million trucks¹⁷. The CREATE Program has strengthened regional freight activity and employment, supporting families in the region and state, yielding \$31.5 billion in economic benefits and an estimated 44,000 job-years over 30 years.¹⁸ P2 will help sustain this growth by improving the Terminal’s reliability, accommodating 53,839 annual Metra SWS train miles, and enhancing Amtrak service funded by Midwest states - addressing a critical need to upgrade the region’s infrastructure to meet the projected demand ([BCA](#), p.14).

In addition, P2’s mobility improvements at the project-area viaducts will improve family travel and safety for users on the streets below the elevated rail structures. Upgrades to the streets passing under the grade-separated structures will benefit 52,700 motorists¹⁹ who travel through these viaducts each day, as well as riders on CTA bus routes 8 and 75, which together carried an estimated 6,567,874 passengers in 2024.²⁰ Three additional CTA bus routes (9,44,48) operate within the planned community mobility improvement area—within a quarter mile of the rail work—and carried an estimated 6,204,864 riders in 2024, representing additional transit users who may benefit from the project. These improvements also benefit bicycle and pedestrian conditions where facilities cross the corridor, including on Halsted St, a designated city bike route.

7.5.3 National Beneficiaries

Constructing P2 will yield substantial national benefits for Amtrak’s intercity passenger service and improve travel for families. By redirecting 30 Metra SWS revenue trains to LaSalle St. Station, train traffic at CUS will decrease by 17%—primarily during peak hours—freeing 30 slots at CUS’s south concourse. This makes P2 a foundational project for enhancing Amtrak service at CUS, and across the Midwest, including upgrading the *Cardinal* route from New York to Chicago from six weekly trains to daily service. Additionally, Metra’s 976,375 annual SWS riders (2024)—an average of nearly 3,700 per day—will shift from the overcrowded CUS to the less utilized LaSalle Street Station, improving the station experience for SWS riders, as well as those of other Metra lines and Amtrak. LaSalle Street Station serves only Metra RID and handled more than 3.1 million passengers in 2024²¹, compared to CUS, which accommodated over 3.2 million Amtrak passengers in FY 2025²² and 13.7 million Metra passengers in 2024²³.

CUS serves as a key node in Amtrak’s national network, as well as its primary hub for Midwestern regional service. Currently, Amtrak operates 17 intercity lines out of CUS, serving 3,202,511 customers in FY 2025,²⁴ making CUS the busiest station outside the Northeast Corridor and the fourth busiest Amtrak station nationwide. As detailed in [Amtrak’s FY24-29 Five-Year Plan](#), Amtrak and the Midwest states are targeting enhanced Midwest service, while Amtrak continues to make progress in modernizing and improving CUS and surrounding infrastructure through the Chicago Hub Improvement Program

¹⁴ USDOT Freight Analysis Framework (2024 carload data)

¹⁵ Intermodal Association of North America, Intermodal Volume Analyzer, 2025-11; 2024 CMAP Railroad Data

¹⁶ [CMAP The Freight Landscape, Regional Freight System Assessment - October 2025](#)

¹⁷ [Rail Transportation and the U.S. Economy: Fueling Growth, Trade, and Opportunity, February 28, 2025](#)

¹⁸ CREATE Economic Benefits Study (Cambridge Systematics, 2015)

¹⁹ [City of Chicago :: Average Daily Traffic Counts](#) (2006)

²⁰ [Chicago Transit Authority Annual Ridership Report 2024](#)

²¹ [Metra Monthly Ridership](#), 2024 Rock Island District

²² Amtrak EDW database (Table C_Train_Stop)

²³ Estimated Number of Metra Trips in 2024 beginning or ending at CUS based on February 2025 Metra Board Memo and Fall 2018 Boarding and Alighting Counts.

²⁴ Amtrak FY 2025 Database

(CHIP). CHIP is intended to improve operations, provide more reliable service, and enhance safety (pg.102). Completing P2 is a critical step toward enabling CUS to deliver reliable intercity passenger service for families and increase service frequency as requested by Midwest State DOTs.

Constructing P2 will deliver significant national benefits by improving supply chain efficiency, particularly for industries that depend on rail to move manufactured goods and natural resources nationwide. Chicago plays a critical role in this network, handling 67% of all east-west gateway traffic and 85% of all east-west intermodal traffic in the U.S.²⁵ As noted in CMAP’s Freight Landscape, Northeastern Illinois is the nation’s busiest rail hub with nearly one-third of U.S. rail cars—11,073,055 in 2022—originating, terminating, or passing through the state each year. In 2023, the Chicago region transported nearly 700 million tons of goods valued at over a trillion dollars. Additionally, in 2022, the Chicago area managed over 306 million tons of outbound, inbound, and through rail shipments of commodities.²⁶

7.6. Project Outcomes

P2 prepares the region’s infrastructure for anticipated growth in passenger and freight movements. AAR’s Rail Traffic Controller (RTC) model, which simulates train performance in the Chicago Terminal with and without the construction of P2 ([Exhibit 3C](#)), indicates that total annual train miles in the Terminal are expected to increase by 1.25 million between 2025 and 2050.²⁷ Terminal enhancements are therefore essential to accommodate this demand. P2’s expected outcomes under the Build and No Build scenarios are summarized in **Table 4** and **Table 5**:

Table 4: Passenger Train & Ridership Counts in the P2 Project Area

Ridership Counts in the Project Area		
Metric	No Build Scenario	Build Scenario
Total Annual Ridership	2,354,300	8,562,320
Annual Intercity Passenger Rail (IPR*) Ridership	Not calculated	4,409,600
Annual Commuter Passenger Rail (CR**) Ridership (2033)	2,354,300	4,152,720
Train Counts in the Project Area		
Metric	No Build Scenario	Build Scenario
Total Weekly Trains	422	500
Weekly Intercity Passenger Rail (IPR*) Trains	272	350
Weekly Commuter Rail (CR) Trains (2033)	150	150
Weekly Freight Trains	Not calculated	Not calculated
*IPR Ridership: Amtrak FY24-29 Five-Year Plans , FY29 Ridership Projections.		
*IPR Trains: 2025 Amtrak’s Fleet and Facilities Plan, 2040 Baseline and Growth Scenarios.		
* P2 is one of several projects enabling increased IPR ridership and train counts in the Build Scenario.		
** STOPS 2037 ridership projection (BCA, Table 5)		

²⁵ [CREATE Program Overview \(December 2024\)](#)

²⁶ [CMAP The Freight Landscape, Regional Freight System Assessment - October 2025](#)

²⁷ [Exhibit 3D. RTC Model Outputs –Train Growth Results and Calculations](#)

Table 5: Operating Speeds in the Length of Track Improvement Area

Operating Speeds in the Length of Track Improvement Area						
	No Build Scenario, IPR	Build Scenario, IPR	No Build Scenario, CR	Build Scenario, CR	No Build Scenario, Freight	Build Scenario, Freight
	SWS: 21st St (MP1.7) to 74th St (MP7.9)	SWS: 21st St (MP1.7) to 74th St (MP7.9)	SWS: 21st St (MP1.7) to Wrightwood Station (MP11.3)	RID-P2-SWS: 16th St RID (MP1.1) to Wrightwood Station SWS (MP11.3)	Damen Ave to 80th St	Damen Ave to 80th St
Average Operating Speed (mph)	35 mph	37 mph	29 mph	41 mph	Not Reported	Not Reported
Highest Maximum Authorized Speed (mph)	60 mph	60 mph	60 mph	79 mph	25mph	25 mph
Lowest Maximum Authorized Speed (mph)	40 mph	40 mph	25 mph	40 mph	25 mph	25mph
Average Scheduled Travel Time (Time/Trip)	11 minutes	11 minutes	20 minutes	14 minutes	Not Reported	Not Reported

*Commuter Rail (CR); Intercity Passenger Rail (IPR); Freight Rail (Freight)

** Amtrak controls CP 21st St. Metra’s ownership is north of 23rd Place to CP 74th St near 74th St.

7.7. Performance Measures

The Benefit-Cost Analysis (BCA), described in **Section 10.3 Project Benefits**, evaluates the P2 impacts of constructing a flyover to shift Metra SWS operations to the RID line using both quantitative and qualitative assessment methods. This analysis captures and highlights the substantial benefits P2 delivers for intercity passenger, freight, and commuter rail services within the 75th St CIP corridor and the broader Chicago region. Aligned with the [BCA](#), **Table 6** presents the key measurable performance metrics, including the “baseline” and “post-project” performance measures for P2.

Table 6. Performance Measurement Information

Goal	Objective	Performance Measure	Description of Measure	Measurement	Reporting
Goal 1: Provide reliable and improved travel for individuals and families	Improve on-time performance (OTP)	Trains Operated Annually (SWS)	Number of trains operating per year (SWS)	Pre-Project (Baseline) Performance as of: 2025: 7,623 trains/year Expected Post-Project Performance: 2033: 7,623 trains/year	Frequency: Annual Duration: 2033-2035

Goal	Objective	Performance Measure	Description of Measure	Measurement	Reporting
		Trains delayed per year (SWS)	Number of Trains delayed by 6 or more minutes per year (SWS)	Pre-Project (Baseline) Performance as of: 2025: 610 trains delayed/year Expected Post-Project Performance: 2033: 229 trains delayed/year	Frequency: Annual Duration: 2033-2035
		Passenger On-Time Performance (SWS)	% of trains with trips within 6 minutes of schedule, annually (SWS)	Pre-Project (Baseline) Performance as of: 2025: 92% annual OTP Expected Post-Project Performance: 2033: 97% annual OTP	Frequency: Annual Duration: 2033-2035

*P2 construction is anticipated to be completed in 2033.

VIII. Safety Benefits Data

Project P2 is also located in Cook County, IL (see also **Section IX. Project Location** for project location), which [FEMA National Risk Index](#) rates as very high risk for natural hazards, with 99.62% of U.S. counties having a lower risk index. Because P2’s structure will be elevated, it may be less vulnerable to natural hazards such as flooding.

The project will improve safety for riders and the overall system for commuter rail, intercity passenger rail, and freight rail in and north of the project corridor. Reconfiguring the lines east of the Belt Junction will create dedicated tracks—three for BRC, two for Metra, and one for NS—while grade separating Metra and BRC tracks. This improvement will eliminate conflicts between 90 daily freight and 30 weekday commuter revenue trains, reducing the risk of collisions to zero and ensuring safer, more reliable travel for over 976,000 annual Metra SWS riders. In addition, shifting 30 weekday SWS revenue trains from NS and Metra CWI trackage to the RID will reduce freight, intercity, and commuter rail conflicts along the Metra CWI line, north of the P2 project area, including trackage adjacent to the NS 47th Street Intermodal and Ashland Yards. The improvements eliminate conflicts with the two daily NS trains and additional unscheduled movements several times per week on Metra CWI line, as well as conflicts with six weekly Amtrak *Cardinal* trains serving over 98,500 annual riders.

The project also includes signal work as referenced in **7.1 Project Scope** at seven distinct locations on the existing and newly constructed segments along the corridor. All railroads in the corridor are currently compliant with Positive Train Control (PTC) standards and will remain so following the proposed signal improvements. Improvements will aim to enhance interoperability between railroads, allowing for more efficient train movements throughout the corridor. Reconfigured track segments and updates to the PTC and Centralized Train Control (CTC) technology will continue to contribute to the prevention of derailments due to excessive speeds, unauthorized train movements within work zones, and the movement of trains through improperly aligned switches.

Street improvements at viaducts provide additional safety benefits, such as improved lighting that will potentially decrease crashes by a factor of 0.68 and reduce crime by 4% ([BCA](#) p. 24). Improved drainage will enhance roadway and sidewalk safety.

By improving Metra SWS service, the project is expected to increase ridership and shift some travelers from personal vehicles to rail. This mode shift is projected to reduce annual vehicle-miles traveled by about 24.7 million miles between 2048 and 2062. By reducing freight rail congestion and avoiding diversion of freight to trucks, the project prevents roughly 558 million truck-miles over this same period. Together, these reductions will yield about \$4.5 million in discounted safety benefits ([BCA](#), p. 20).

IX. Project Location

In addition to Cook County as described in **Section VIII. Safety Benefits Data**, P2 is located within the Chicago IL-IN 2020 Census Designated Urban Area and spans Auburn Gresham, Englewood, and Greater Grand Crossing communities. P2 is in Illinois US congressional districts 1 and 7. P2 coordinates are 41.757919, -87.648866 degrees at the western limits; 41.763630, -87.634453 degrees at the northeastern limits; and 41.754914, -87.637778 degrees at the southeastern limits. P2 will be fully grade separated with no new at-grade rail crossings. The P2 location map can be found on the [application website](#).

X. Evaluation and Selection Criteria

10.1. Project Readiness

As shown in **Figure 5**, P2 is currently in final engineering, which began in 2020 and will be completed in Q2 2027. If selected for NRP-FSP funding, grant agreement would likely be executed in 2027, with contractor procurement completed in 2028, and construction work anticipated to occur from 2028 to 2033. Train movements will be maintained through the corridor during construction. Land acquisition needs and real property interests (ROW, fee, and easements) to be acquired from private property owners have been identified and applicable funding for all land acquisition and relocation services will occur via other funding sources as described in **Section III. Project Funding**. This NRP-FSP grant will not be utilized for any land acquisition or relocation services. The State Rail Agreement ([Exhibit 2E](#)) that covers all land acquisition and ROW needs, has been executed. Acquisition of identified real estate interests and relocation, if any, are expected to be completed by Q2 2027. Planning, conceptual design, preliminary engineering, FEIS, and ROD are 100% complete. Public involvement will be ongoing through P2 construction.

10.1.1. Environmental Readiness

The Project's environmental review process is complete. FHWA approved the 75th St CIP's [FEIS](#) and [ROD](#) on September 19th 2014, providing a federal environmental clearance for P3, GS19, EW2, and P2 as environmentally linked projects. In addition to P2's environmental commitments, the project will obtain environmental permits detailed in **Section 12.1 Environmental Compliance Documentation** to ensure environmental and public health protection. An [EIS reevaluation](#) in 2017 confirmed that the 75th St CIP FEIS and ROD findings remained accurate and valid. Because more than eight years have passed since FHWA approved the 2017 EIS reevaluation due to the overall 75th St CIP cost and phasing constraints, certain EIS documents—such as the EIS technical memorandum and related studies—will be reevaluated and updated. These documents will be updated for FHWA's approval before the final design report is completed and construction begins. Critical project phase milestones following 2017 include:

- **2018:** FY2017-2018 INFRA Agreement, funded 75th St CIP final design and P3 and GS19 construction
- **2020:** 75th St CIP – Phase II/III Stakeholder Involvement Plan; Project P2 and EW2 begins final design
- **2022:** Projects P3 and GS19 begin construction
- **2024:** EW2 Segment A is awarded construction funding
- **2025:** Project P3 construction operationally and substantially complete

10.1.2 Lifecycle Stage Summary

P2 is in the Implementation Stage (Final Design). The Systems Planning Stage—covering the program-wide feasibility study and defining the scope, objectives, and benefits of the 75th St CIP (including P2) was completed in 2007 and modified in 2011. The Development Stage (Project Planning and Development) was concluded with FHWA’s approval of the [75th St CIP’s \(FEIS\)](#) and ([ROD](#)) in 2014 and the preliminary engineering report in 2015. Final design for P2 began in 2020 and is expected to finish by Q2 2027, pending NRP-FSP funding to begin construction.

10.1.3. Project & Partner Coordination

CREATE is a partnership of all six North American Class I railroads, short line railroads, and various agencies, including Amtrak, Metra, IDOT, the City of Chicago, and Cook County. The CREATE Program partners regularly coordinate with FHWA and FRA on the 75th St CIP, including P2, and have ensured its inclusion in relevant state and local plans such as CMAP’s Transportation Improvement Program (TIP). CREATE is updating the 75th St CIP’s [Stakeholder Involvement Plan \(SIP\)](#) to guide stakeholder outreach. To date, P2 has secured over [62 support letters](#) from elected officials, agencies, organizations, and community stakeholders, with additional letters posted on the [application website](#) after submission.

10.1.4. Status & Timeline of Agreements

CREATE projects are governed by a Joint Statement of Understanding (JSOU), executed in 2003 and amended in 2018 ([Exhibit 2G](#)). The CREATE Program Partnerships and Management practices ([Exhibit 2F](#)) ensure construction activities do not hinder the Terminal’s capacity and access. Metra, NS, and BRC will oversee the design and construction of the respective passenger and freight rail infrastructure for the P2 project, while IDOT and the City of Chicago will provide project oversight and permitting coordination. Interagency coordination around land acquisition needs and real property interests are also captured in [Exhibit 2E](#).

10.1.5. Financial Readiness

Non-federal matching funds are committed and secured for 20% of total construction cost from IDOT, Metra, Cook County, the City of Chicago, Amtrak and the Freight Railroads in the amount of \$95,994,245 for the P2 construction. The non-federal funding commitment letter is available on the [application website](#).

10.2. Technical Merit

10.2.1. Scope of Work

The proposed tasks and subtasks are appropriate and follow CREATE best practices for projects of similar size and scope. CREATE’s rigorous design and review process ensures compliance with all federal, state, and local requirements and supports responsible, high-quality project delivery. This process confirms that the proposed budget and schedule are appropriate for achieving the project’s objectives and outcomes. As discussed in **Section 10.1.1 Environmental Readiness**, the P2’s preliminary design is approved and final design is nearing completion.

10.2.2 Qualifications and Experience of Key Personnel

CREATE partners have extensive experience delivering projects of similar scope, having administered 16 federal grants totaling \$750 million over the last 20 years. Each project is managed by a sponsor overseeing procurement, engineering, and construction activities. For P2, IDOT serves as the sponsor, overseeing financial management, partner coordination, and environmental review. Metra, NS, and BRC will oversee the design and construction of their respective infrastructure, with partner railroads providing review and concurrence. The Chicago Transportation Coordination Office (CTCO) will oversee rail operations through the corridor during construction, while IDOT, Cook County and the City of Chicago

provide project oversight and permitting coordination. The personnel assigned to P2 have a strong track record of successfully delivering CREATE projects:

Amtrak: Joe Shacter (Director, Program Management). Mr. Shacter holds over 15 years of leadership experience at Amtrak and IDOT and will assist with agency coordination.

Association of American Railroads: Bill Thompson (Chief Engineer), Rebecca Wingate (CREATE Program Manager). Mr. Thompson brings over 40 years of freight rail operations, design, construction, and research experience and has been a CREATE partner since 2005. Ms. Wingate is a civil engineer with 18 years of railroad engineering, construction, and transportation planning experience. Both will support IDOT as project sponsor and Metra.

Belt Railway Company of Chicago (Design and Construction): Ed DeVries (General Counsel), Thomas Lyons (Chief Engineer). Mr. DeVries joined the BRC in 2025 after 10 years practicing railroad law, and Mr. Lyons joined in 2024 after 8 years with Norfolk Southern. Both will provide review support.

City of Chicago: Jeff Sriver (Dir. of Transportation Planning & Programming), Ryan Richter (Rail Coordinating Planner). Mr. Sriver has led planning and engineering at CDOT for 16 years and has been a CREATE partner since 2003. Mr. Richter has been a transportation planner for 15 years, including 6 years of railroad experience at Metra. Both will provide oversight and permitting support.

Cook County: Jesse Elam (Dir. of Strategic Planning & Policy), Tara Orbon (Asst. Superintendent), Jennifer Killen (Superintendent). Mr. Elam is a planner with 19 years of experience at Cook County and CMAP. Ms. Orbon is a transportation engineer with 26 years of experience, including 9 years of leadership at Cook County. Ms. Killen is also a transportation engineer with 26 years of experience, including nearly 5 years as Cook County superintendent. All will assist with oversight and agency coordination.

IDOT (Project Sponsor): Joanne Fehn (Freight Rail Bureau Chief), Carrie Cooper (Deputy Dir., Office of Intermodal Project Implementation [OIPI]), Jason Osborn (Dir., OIPI). Ms. Fehn has over 30 years of legal, corporate, and governmental experience in the public and private sectors. Her public service includes leading and managing cases, projects, and successful teams at the Illinois Tollway, Office of the Illinois Attorney General, and IDOT. As IDOT's Bureau Chief of Freight Rail Management, Ms. Fehn oversees the CREATE program. Ms. Cooper has more than 30 years of transportation experience across roadway, transit, and rail in both the public and private sectors. Mr. Osborn brings 25 years of transportation and government administration experience with IDOT and Metra. Together, they will oversee project management, grant administration, procurement, and coordination.

Infrastructure Engineering, Inc. / RINA (IDOT Program Management Consultant): Samuel Tuck III (Project Manager). Prior to joining Infrastructure Engineering, Mr. Tuck served as the CREATE Project Manager on behalf of IDOT, during his ten years as IDOT Freight Rail Bureau Chief.

Metra (Design and Construction): David Kralik (Director, Planning & Programming), Paul Bobby (Operations Engineer). Mr. Kralik has 24 years of experience at Metra, where he oversees transportation planning. He will provide agency coordination and oversight. Mr. Bobby, an engineer with 25 years of railroad engineering experience and 5 years as Metra PMO's Deputy Program Manager for Implementation, will oversee final design and construction.

Norfolk Southern (Design and Construction): Jacob Watson (Planning Engineer), Herbert Smith (Regional VP, Government Affairs). Mr. Watson brings 13 years of railroad engineering experience at NS and will provide oversight of project implementation. Mr. Smith brings 17 years of government relations experience at NS and will assist with agency coordination and public engagement.

Union Pacific: Katie Novak (General Director – Interline Operations). Ms. Novak holds 19 years of public affairs and railroad operations experience at UP. She will assist with coordination.

WSP (IDOT Corridor Management Consultant): Chris Ferguson (Project Manager). A supervising signal engineer with 21 years of experience in private consulting and at NS, Mr. Ferguson will assist IDOT with project management, coordination, and railroad oversight.

10.2.3. Private Sector Participation

P2 demonstrates strong private sector collaboration. Led by the key personnel listed in **Section 10.2.2.**, private railroads have been active partners since CREATE Program’s Final Feasibility Plan, the 75th St CIP Phase I Preliminary Engineering and Environmental Studies, and throughout P2’s ongoing final design. They have committed \$10 million toward P2 construction, and project delivery will leverage their ongoing Terminal maintenance and state of good repair investments, totaling over \$575 million since 1998.

10.2.4. Legal, Financial, and Technical Capacity

IDOT, as project sponsor and lead applicant, has the legal, financial, and technical capacity to oversee P2’s delivery. P2 funding and implementation will be supported by the CREATE partners described in **Section 10.2.2.**, and IDOT will coordinate closely with affected railroads and funding partners in its role as grant administrator. Each CREATE partner has extensive experience delivering complex transportation infrastructure projects. After P2 is completed, Metra, NS and BRC will operate and maintain their respective facilities and equipment.

10.2.5. Innovation

P2 incorporates innovative and effective technology, approaches to project delivery, and funding and financing solutions. While the Project uses proven industry systems—such as modern bridge design, centralized traffic control, and updated PTC-capable signals—these elements represent significant upgrades to the corridor. P2 also strengthens asset and operational protection through an innovative cybersecurity framework overseen by AAR and the participating railroads via the CREATE Rail Information Security Committee (RISC).

The Project will deliver important safety, mobility, track, and signal improvements with minimal disruption to rail operations and will set the stage for future enhancements. The procurement process will require bidders to propose strategies that maximize construction efficiency and minimize impacts on rail traffic and on motorized and non-motorized users under the viaducts.

10.2.6. Consistency with Planning Guidance & Documents

This Project requires local approvals through CMAP TIP and is included in the federal fiscal year 2023-2028 TIP under ID [01-07-0001](#). TIP projects align with CMAP’s [ON TO 2050 Comprehensive Regional Plan](#), where it is emphasized that “the CREATE Program has greatly improved rail movement in the region and nationwide, [but that] the effort requires continued investment with a focus on public benefits.” The Plan also highlights the 75th St CIP as the “largest, most complex, and most significant remaining component of the CREATE program,” making it a regionally and nationally significant infrastructure investment. The CMAP TIP is included in the Illinois Statewide Transportation Improvement Program (STIP) ([Exhibit 2I](#)). The CREATE Program is featured prominently in the current versions of the [Illinois State Rail Plan](#), the [State Freight Plan](#), and the [Long Range Transportation Plan](#). As shown above, the Project is included in all required metropolitan and State planning documents. See [TIP](#) and STIP ([Exhibit 2I](#)).

10.3. Project Benefits

P2 delivers substantial benefits by improving passenger rail service, enhancing freight and passenger network efficiency, and avoiding significant future costs. The **benefit-cost ratio is 3.01 (Table 7)**. The Project improves Metra SWS operations, producing travel time savings, attracting new riders, and

reducing automobile use and related externalities such as congestion, noise, and safety impacts (**Benefits 1a, 1b, 1c**). By shifting SWS trains to the new flyover, P2 also enables Metra to avoid costly rehabilitation and replacement of 44 aging single-track bridge structures while still accommodating the *Cardinal* service (**Benefit 2**). These changes also ease congestion in the Chicago Terminal and reduce passenger and freight rail delays and fuel costs (**Benefits 3a and 3b**). As a major rail hub, reducing Chicago Terminal congestion also prevents future freight diversion to trucks or alternate rail gateways that would otherwise be required as delays grow (**Benefits 4a and 4b**). In addition, P2 enhances community safety through lighting, sidewalk, and viaduct improvements that help reduce crashes and crime (**Benefits 5a and 5b**). Overall, P2 generates more than \$761 million in discounted benefits, far exceeding discounted costs of \$253 million, and aligns with the NRP-FSP selection criteria shown in **Table 7** (see also [BCA](#)).

Table 7: Discounted Benefits by Category in (2024\$)

No	Benefit Categories	Discounted Value	NRP-FSP Selection Criteria *
1a	Metra Passenger Travel Time Savings resulting from Service Improvements	\$91,331,987	A, C, E
1b	Reduced Auto Use resulting from Metra Mode Shift	\$84,944,802	A, B, C, E, F
1c	Metra O&M Cost Increase resulting from Service Improvements	-\$28,319,482	A, C, E, F
2	Metra O&M Cost Savings resulting from Bridge Replacement Savings	\$248,089,912	A, C, F
3a	Avoided Delay resulting from Typical Operations	\$10,709,773	A, C, D, E
3b	Avoided Passenger Rail Cost resulting from Reduced Train Delay	\$402,250	A, C, D, E
4a	Avoided Truck Diversion resulting from Network Congestion	\$27,894,870	A, B, C, E, F
4b	Avoided Rail Diversion resulting from Network Congestion	\$305,933,435	A, C, E, F
5a	Reduced Crashes resulting from Lighting and Sidewalk Improvements	\$1,582,598	B
5b	Reduced Crime resulting from Lighting and Sidewalk Improvements	\$54,118	B
Residual Value		\$19,223,065	-
Net Benefits		\$761,847,327	-
Total Costs		\$253,114,530	-
Benefits / Costs Ratio		3.01	-
Net Present Value		\$508,732,797	-
* A. Effects on system and service performance; B. Effects on safety; C. Effects on competitiveness, reliability, trip or transit time, and resilience; D. Positive economic and employment impact; E. Efficiencies from improved integration with other modes; F. Ability to meet existing or anticipated demand; G. Servicing historically unconnected or under-connected communities			

In addition to the benefit classes quantified in **Table 7**, the Project is expected to generate additional benefits including:

- **Benefits to Amtrak’s *Cardinal* service**, part of FRA’s Corridor ID Program and the only rail option connecting Indianapolis, Cincinnati, and Charleston (WV) to Washington D.C., Philadelphia, New York, and Chicago. Amtrak currently operates six weekly *Cardinal* trains through Chicago but plans

to move to daily service. Completing P2 will relieve a key bottleneck in the 75th St CIP area, enabling daily operations. Daily service would boost ridership and mode shift by offering passengers greater flexibility, reliability, and alternatives to driving or higher-cost air travel.

- **Better use of LaSalle Street Station**, gained from diverting SWS trains via the Flyover portion of the P2 from the overcrowded CUS to the less utilized LaSalle Street Station, improving the station experience for SWS riders, as well as those of other Metra lines and Amtrak. Better utilization of LaSalle Street Station will also bring more passengers there, creating an opportunity for economic growth and increased services as well as a better service experience for passengers.
- **Community improvements** remain central to CREATE projects, including P2. Enhancing passenger and freight rail operations will reduce noise, roadway congestion, and safety risks, improving conditions for autos, buses, bicyclists and pedestrians. These benefits support safer travel, better traffic flow, and boarder community, economic, and quality of life gains for nearby residents and families through reduced congestion, opportunities for commercial development, and more vibrant streetscapes.

Overall, the BCA demonstrates that the Project's benefits far exceed its costs, reflecting strong financial performance and meaningful improvements to passenger rail service, network efficiency, and state of good repair in the Chicago area. A sensitivity analysis confirms these benefits remain robust across multiple scenarios, demonstrating that the Project is a highly effective investment that maximizes public benefits and delivers positive impacts to the region, national economy, and transportation systems.

P2 lies within the Auburn Gresham Bungalow and Hamilton Park Historic Districts²⁸, both significant community historic resources. The project also spans several designated Opportunity Zones, including census tracts in Auburn Gresham (17031710100, 17031710200, and 17031710300), West Englewood (17031671800), Englewood (17031681300), and Greater Grand Crossing (17031691100)²⁹. Opportunity Zones are federally designated areas aimed at stimulating economic growth and job creation in underserved, low-income communities. The CREATE Program has already supported regional economic growth, and P2 will build on this momentum by delivering continued benefits to Chicago and the surrounding Opportunity Zone communities.

10.4. Selection Criteria

10.4.1. Application Partnership

The CREATE program is a unique public-private partnership involving the USDOT, the State, Cook County, the City of Chicago, Metra, Amtrak, and the nation's Class I freight railroads. This collaborative effort ensures that no one agency or railroad is the sole applicant for this project. By leveraging the strengths and resources of these diverse partners, the CREATE program aims to enhance the efficiency and reliability of the region's rail infrastructure, benefiting both passenger and freight rail.

10.4.2. Improving Financial Performance, Reliability, Service Frequency, and State of Good Repair of an Amtrak Route

P2 will improve Amtrak and Metra passenger rail service, reducing delays for both trains and roadway users. The Project will make Amtrak routes more attractive to passengers and families, support economic growth, and ensure a sustainable and efficient rail system. These improvements are summarized below:

²⁸ Illinois State Historic Preservation Office - [Historic and Architectural Resources Geographic Information System \(HARGIS\)](#)

²⁹ [Chicago Opportunity Zones Map](#)

Financial Performance:

- P2 supports increasing the efficiency of Amtrak routes traveling through the Terminal by reducing congestion and delay. CREATE projects are developed in coordination with Amtrak, with a focus on lowering operating costs and yielding better financial performance due to trains meeting schedules more reliably, thus reducing the need for costly overtime and fuel consumption.
- Economic growth through improved rail infrastructure is an IPR goal of P2. The project will help the Terminal attract more passengers, boosting ticket sales and revenue. Additionally, enhanced freight movement supports local economies, indirectly benefiting Amtrak.

Reliability:

- Infrastructure upgrades planned for P2 focus on critical infrastructure, which reduces the likelihood of breakdowns and delays in the corridor.
- Bottleneck reduction in the Terminal can be achieved by addressing the current shared track arrangement through Belt Junction that continues on the Metra CWI and NS on their way to CUS. P2 will support more predictable train operations and improved overall reliability.
- P2 also avoids rail freight from diverting to trucks and being routed to alternate rail gateways such as St. Louis or Kansas City due to growing congestion in the Chicago Terminal.

Service Frequency:

- P2's addition of track and a flyover will create 30 passenger service slots at CUS, enabling Amtrak to increase service frequency on publicly owned infrastructure at this critical intercity rail hub – including upgrading the *Cardinal* route from six weekly trains to daily service.
- There are ten identified Corridor ID projects with a demonstrated need to access the Chicago Terminal if they are to be feasibly implemented. P2 will allow for increased frequencies on existing routes aligning with Midwest states' goal to enhance passenger rail.

State of Good Repair:

- By rerouting SWS trains to the RID via the new flyover, P2 allows Metra to avoid approximately \$248 million in rehabilitation and replacement costs for single-track bridges from 74th St to 23rd Pl while still accommodating Amtrak *Cardinal* service (See **Section 7.3.3 State of Good Repair**).
- Maintenance and modernization are core to the CREATE Program's mission. CREATE's ongoing capital asset planning and management ensure that rail infrastructure remains in good condition, reducing the backlog of repairs and extending the lifespan of assets.
- All CREATE projects include safety enhancements, such as improved signaling, to deliver a safer, more reliable rail network for Amtrak, Metra and freight carriers.

10.4.3. Consistency with Corridor Identification and Development Program

The CID Program helps guide IPR development throughout the country and creates a pipeline of intercity passenger rail projects ready for implementation. CREATE P2 will improve existing rail service on publicly owned infrastructure accessing the Chicago Terminal. The project will create 30 additional slots for passenger service at CUS, aligning with the Midwest states' goal of increased service frequency, as well as Amtrak's CID goal of increasing *Cardinal* service from six weekly trains to daily service.

10.4.4. Safe Transportation System

P2 will improve transportation safety, eliminate rail-to-rail conflicts among freight and passenger trains through grade separation, and will provide dedicated tracks for Metra, NS, and BRC. Shifting 30 weekday Metra SWS revenue trains to the RID further reduces operational conflicts with NS and Amtrak on the

Metra CWI line. The P2 improvements will enhance safety for 90 daily freight trains at the Belt Junction, 2 daily NS trains (plus unscheduled movements), 30 weekday Metra SWS revenue trains carrying over 976,000 annual riders, and six weekly Amtrak *Cardinal* trains serving over 98,500 annual riders between Chicago and New York. The existing corridor will remain fully compliant with PTC standards before and after construction, with upgraded CTC and PTC technology to prevent collisions, derailments, unauthorized movements, and movements through misaligned switches. Further, the elevated flyover design will significantly reduce rail-related trespassing incidents.

Improving Metra SWS service will shift travelers from driving, reducing about 24.7 million vehicle miles traveled over 30 years. Reducing congestion in the Chicago Terminal will also prevent freight diversion to trucks, avoiding roughly 558 million truck miles over the same period. Together, these reductions generate a discounted safety benefit of \$4.5 million.

Improved lighting and other community mobility improvements are anticipated to reduce crashes on the streets under the project area viaducts by a factor of 0.68 and reduce crime by 4% ([BCA](#), p. 24).

10.4.5. Improvements to Accessibility

Through CREATE's community mobility improvements, P2 will enhance safety on streets beneath the grade-separated rail structures. In the Project's [FEIS](#), the City of Chicago identified needed upgrades to lighting, pavement, pedestrian accessibility, and drainage to bring these roadways to a state of good repair and reduce crashes and crime. These improvements (shown in [Exhibit 2H. Environmental Commitments](#)), will enhance connectivity between neighborhoods across the project area.

10.4.6. Alignment with Administration Priorities

P2 advances the following USDOT administration priorities as defined in the NOFO:

Improving Overall Travel for Families

P2 will enhance travel experience for families and individuals by reducing travel times and enabling potential increases in Metra and Amtrak services. From 2033-2062, Metra SWS are projected to save about 534,063 person-hours annually. The project will also strengthen passenger rail service in the Chicago Terminal by accommodating increased demand of 1,638 additional Metra SWS train trips, freeing 30 train slots at CUS, and enabling Amtrak to upgrade the *Cardinal* service from six weekly trains to daily service. Shifting SWS service from the overcrowded CUS to the less utilized LaSalle St Station will further enhance the passenger experience.

Family-Supporting Jobs

P2 will strengthen regional and statewide freight economy and support family-sustaining jobs. CMAP reports that the region's freight network supported 210,000 jobs in 2024, with freight railroads directly employing more than 13,000 people³⁰. Statewide, rail activity contributed to \$4.7 billion in household income in 2023³¹. The CREATE Program is projected to generate \$31.5 billion in economic benefits and 44,000 job-years over 30 years³². With a construction cost of \$479,971,233, P2 will further advance this economic momentum by creating family-supporting jobs and supporting continued growth.

XI. Project Implementation and Management

11.1. Project Oversight and Contracting

CREATE projects are managed by individual sponsors who oversee procurement, engineering, and construction activities, following federal standards through preliminary engineering, NEPA, and final

³⁰ [CMAP The Freight Landscape, Regional Freight System Assessment - October 2025](#)

³¹ [Rail Transportation and the U.S. Economy: Fueling Growth, Trade, and Opportunity, February 28, 2025](#)

³² CREATE Economic Benefits Study (Cambridge Systematics, 2015)

design to maintain eligibility for federal funding. As grant administrator, IDOT will coordinate closely with affected railroad operators and funding partners.

P2 will follow established CREATE processes and procedures for engineering, design, and procurement work. The project requires extensive coordination to avoid long-term impacts on network capacity and access. All construction bid packages will be issued through federally approved processes with IDOT oversight. Track and signal work will be completed by the railroads under union agreements. Metra, BRC, and NS will manage change orders in accordance with CREATE procedures, with IDOT approval required before any changes proceed. Construction will comply with FRA, partner agency, and railroad standards, as well as CREATE Partnerships and Management practices ([Exhibit 2F](#)).

After construction and closeout, each railroad will operate and maintain its respective infrastructure, while public highway components will be owned and maintained by the appropriate public agency per CREATE JSOU ([Exhibit 2G](#)). Properties to be acquired through other funding sources for P2 is to be done in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended from time to time, and its implementing regulations (49 CFR Part 24) and will also be subject to existing, executed IDOT state rail agreements with the applicable railroads for acquisition, maintenance, and disposition, as detailed in *Attachment A8-2 - Property Acquisition Using Federal Funds* in [Exhibit 2E. P2 ROW Acquisition Plan & Agreement](#).

11.2. Project Management Experience

Among its public and private partners, the CREATE Program has extensive experience completing large and complex projects, having administered 16 federal grants over the last 20 years, totaling \$750 million. Each CREATE project is managed by an individual organization sponsor that leads procurement, engineering, and construction activities. For this Project, IDOT will serve as the sponsor, and assume its traditional role related to financial management, partner coordination, and oversight of the environmental assessment process. Metra, NS, and BRC will oversee the design and construction process of their own infrastructure. Maintenance and operation will be facilitated by the respective railroad. IDOT, Cook County, and the City of Chicago will assist with project oversight and permitting coordination.

11.3. Qualifications and Experience of Key Personnel

Qualification descriptions and experience of key personnel are found in **Section 10.2.2**.

11.4. Implementing the Project Management Plan

CREATE developed a [Project Management Plan](#) for the entire 75th St. CIP in July 2020, including P2. It includes construction phase plans pertaining to procurement, organizational management, controls, communication, documentation, reporting, and closeout.

11.5. Assessment of Project Risks and Mitigation Strategies

IDOT brings extensive experience managing federal awards, is committed to successful project delivery, and will maintain open communication with FRA. IDOT also has an established working relationship with FHWA through past and ongoing federal projects, including FHWA's role in the 75th St. CIP's environmental review. Under the CREATE JSOU, each owner will assume responsibility for maintenance, operations, management, and dispatch on its property following construction completion.

Project risks and mitigation strategies—outlined in the [P2 Risk Assessment](#)—include land acquisition and relocations (funded by other sources. See **Section III**), unforeseen environmental issues, design revisions, cost escalation, material supply delays, labor shortages, unknown utilities, and local permitting. As described in [Exhibit 2E](#), required property acquisition and permanent and temporary easements may introduce minor schedule risk. The [FEIS](#) identifies environmental mitigation responsibilities for all partners, summarized in [Exhibit 2H. Environmental Commitments](#). Partners will also address project cost risks during implementation in accordance with the [Estimates and Contingency Plan \(Exhibit 2A\)](#).

11.6. Project Progress Reporting

IDOT and CREATE will comply with all USDOT reporting requirements and as detailed in the grant agreement, including quarterly progress reports and federal financial reports, interim and final performance reports, and all applicable auditing, monitoring, and close out requirements. Included in the reporting will be performance measures mutually agreed upon by USDOT and IDOT. **Section 7.7** provides proposed performance measures for P2.

XII. Other Information

12.1. Environmental Compliance Documentation

P2's environmental compliance documents include the combined [FEIS](#) and [ROD](#) approved in 2014 by FHWA for the 75th St CIP and P2's environmental commitments ([Exhibit 2H](#)). An [EIS reevaluation](#) was conducted in 2017 concluding the FEIS and ROD remain accurate and valid. As part of the final design process, certain environmental documents developed during in the EIS phase will need to be reevaluated and updated. These documents will be updated for approval by FHWA in advance of the completion of the final design report and start of construction.

The Project will also require securing various permits from numerous state and local agencies. Metra developed a permit matrix ([Exhibit 2D. P2 Permit Matrix](#)) to assist this process. BRC and NS will require similar permits for their respective P2 improvements.

12.2. Draft Agreements, per 49 U.S.C. 22905(c)(1)

The CREATE JSOU ([Exhibit 2G](#)) details the established programmatic agreement between partner agencies and organizations (including rail operators and owners) that dictate all planning, design, and construction activities in the program. In addition, IDOT has received draft agreements (49 U.S.C. 22905(c)(1)) from NS, Metra, and BRC. All required 22905 agreements will be negotiated and finalized among and between the applicable parties prior to grant obligation if P2 is awarded the grant.

12.3. Letters of Support & Funding Commitments

P2 support letters and signed funding commitment letters from IDOT, City of Chicago, AAR (representing participating private railroads), Cook County, Amtrak, and Metra are included in this submission and available on the [application website](#).

12.4. Exhibits

Exhibits are included in this submission and on the [application website](#), organized under these categories: (1) Maps, Graphics & Engineering Drawings; (2) Project Management Documents; (3) Data Outputs.

12.5. Major Capital Projects

The P2 project qualifies as a major capital project, with the total lifecycle costs exceeding \$500 million and a federal assistance request of more than \$100 million through this grant application. P2 detailed cost estimate and schedule along with the risk assessment and project management plan can be found on the [application website](#).

12.6. Project Specific Terms and Conditions

The P2 statement of work, estimated project schedule, project budget, and performance measures using Articles 4-7 of Attachment 2: Project Specific Terms and Conditions of FRA's grant template can be found on the [application website](#).