

PROJECT READINESS

The sections below present requested information relevant to evaluating the readiness of CREATE’s EW2A Project (the Project) based on an Environmental Risk Assessment and a Technical Capacity Assessment. A Financial Completeness Assessment will be based on a review of the accompanying Project Budget.

Environmental Risk

This section describes the Project schedule and review status and its ability, if awarded MPDG funding, to begin construction in a timely manner consistent with all applicable local, State, and Federal requirements.

Detailed Project Schedule

Final design of the Project began in Q1 of 2021 and will be completed in Q3 of 2025, prior to the beginning of construction. If the Project is selected for MPDG funding, construction will begin in Q1 of 2026 with completion by Q2 2032. Railroad movements throughout the corridor will be operational throughout the construction period. Easements from private property owners will be pursued during the Final Design phase. Land acquisition and easement needs are summarized in the Required Approvals section in page 2 and in [Exhibit 2X](#). Previously completed Project activities include planning, environmental clearance, and conceptual design. Public involvement is ongoing throughout the life of the Project. Design, right-of way acquisition, contractor procurement activities, and initiation of construction will be completed by Q2 2026, allowing for the full obligation of all MPDG grant funds in advance of the statutory deadline of September 30, 2026. As noted in the Project Description, EW2A is the first in a sequence of EW2 projects, and it has been designed to enable subsequent phases to be built alongside its construction. Additionally, EW2A’s construction will be specifically segmented into 5 distinct phases, detailed in [Exhibit 2H. EW2A Segmentation Schematics](#). The detailed project schedule is also provided in [Exhibit 1B](#). *Figure 1* outlines EW2A’s current estimated schedule.

Figure 1. EW2A Project Schedule (See [Exhibit 2B](#) for Detailed Project Schedule)

Task, Milestone, or Deliverable	2023				2024				2025				2026				2027				2028				2029				2030				2031				2032			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4				
Track Design																																								
Bridge Design																																								
ROW Acquisition																																								
Federal-Aid Project Agreement																																								
FY23/24 MPDG Obligation Deadline																																								
Construction																																								
Community Partnership & Engagement																																								

Required Approvals

Environmental Permits and Reviews

NEPA Class of Action and Status

The Project’s environmental review process was completed in September 2014 when the Federal Highway Administration (FHWA) approved the 75th St CIP’s [Phase I Environmental Impact Statement \(EIS\)](#) and [Record of Decision \(ROD\)](#), which provided a formal environmental clearance for Projects P3, GS19, EW2, and P2. As these four projects were determined by IDOT and FHWA to be environmentally linked, they were all cleared under

the same NEPA process. That said, due to the cost and phasing constraints of the entire 75th St CIP, it has been nine years since the original EIS approval. In turn, as part of the Phase II design process, certain environmental documents developed in the EIS phase will need to be reevaluated and updated, such as the environmental class of determination (ECAD) technical memorandum and other studies. These documents will be updated and approved by FHWA in advance of the completion of the Phase II final report and start of the construction phase.

US Department of Transportation Coordination

The Illinois Department of Transportation (IDOT) and its partners have regularly coordinated with FHWA and FRA staff around the development of Project EW2A, the 75th St CIP, and the CREATE Program as a whole. FHWA field staff specifically hold bi-weekly meetings with IDOT to review the status of all CREATE projects and have provided oversight and guidance on the design and delivery of Projects P3 and GS19. In March 2023, FHWA staff also held a Construction, Schedule, and Risk Assessment (CSRA) workshop for the 75th St CIP with the CREATE partners, a collaborative process aimed at guiding Project implementation through changes in cost and feasibility. This Project also requires permitting and approvals from local and state agencies for improvements within the public right of way (ROW), as detailed on page. 3.

Other Reviews, Approvals, and Permits

As with the design and construction process for all CREATE projects, IDOT will establish State Railroad Agreements (SRA) with the Project's partner railroads, to facilitate the transfer of grant funds for EW2A's project work. For the design work that is underway, EW2A has established inter-railroad agreements (IRA), governing the collective payment and oversight of engineering activities between the Project's partner railroads. Real estate agreements will also be established between the CREATE partners and relevant property owners, around planned right of way acquisition and easements that are necessary for the Project's delivery (detailed in the next section).

Right-of-Way Acquisition Plans

The Project improvements to tracks, signals, and bridge structures will be constructed primarily in existing railroad ROW. However, as detailed in [Exhibit 2I. Right of Way Acquisition Plan](#), the Project will be acquiring 0.7 acres of property along the southern edge of the corridor (between S Halsted St and S Union St), and 0.8 acres of City right-of-way will be vacated (to the west of the Emerald Wye) for access and embankment uses. A 0.6-acre permanent easement on the north side of the tracks (between S Halsted St and S Union St) will be established for the same purpose, and 2.7 acres of temporary easements for construction work will be established, between S Racine St and S Halsted St, and west of Forest Hill Junction (south of the tracks). Easement agreements have not yet been executed and will be pursued during the final design phase. Similarly, the property acquisition process is underway, and will be completed before approval of the Phase II report. All real property and right-of-way acquisition will be completed in accordance with 49 CFR part 24, 23 CFR part 710.

Public Engagement

CREATE has sought community input through public involvement, particularly from the environmental justice communities most directly served and impacted by the 75th St CIP. The Project completed a [Stakeholder Involvement Plan](#) (SIP) in August 2020, with the goal of guiding the collection and organization of input from all stakeholders. The SIP ensured

meaningful engagement with stakeholders affected by the Project, including disadvantaged communities. The SIP is regularly updated and is informed by USDOT’s “[Promising Practices for Meaningful Public Involvement in Transportation Decision-Making Guide](#)” to ensure that the engagement process and partnerships remain centered on equity and inclusivity.

Stakeholder engagement began in July 2018 and is ongoing. In Phase I, two Community Advisory Groups (CAG) were established to focus on specific areas of concern, CAG West (focusing on P3 and GS19) and CAG East (focusing on EW2 and P2). CAG East, which will provide oversight of EW2A, consists of representatives from local churches, schools, community groups, businesses, emergency service providers, elected officials and other groups. CAG members were selected to represent diverse local views within the Project corridor. As the Project corridor serves historically disadvantaged communities, ensuring the CAG members represented the community throughout the development of the Project was one of the CREATE Program’s key objectives. Input from CAG members is a critical element for delivering numerous key project elements, including environmental commitments; community mobility improvements; education, local jobs and contracting initiatives (delivered in coordination with local union chapters); project re-evaluations; assessing construction activities and impacts; and maintaining quality of life in communities during construction. Additional outreach methods undertaken for the 75th St CIP include meetings with elected officials, impacted property owners, small groups and block clubs, media briefings, website updates, newsletters, fact sheets, meet and greets with construction staff, public information PowerPoint decks, and special business-to-business events like [Get On Board](#), and vendor networking sessions. More detail is provided in the [Community Benefits Fact Sheet](#).

State and Local Approvals

This Project is subject to local approvals through the Chicago Metropolitan Agency for Planning (CMAP) [Transportation Improvement Program \(TIP\)](#) and is included in the federal fiscal year 2022-2026 TIP. The TIP ID number for this Project is [01-05-0012](#). Projects in the TIP are consistent 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 significant infrastructure investment. The CMAP TIP is included in the [Illinois Statewide Transportation Improvement Program \(STIP\)](#). The Project’s IDOT State Job Number is D-20-002-20. 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](#). The Project has also garnered local support and participation from the City of Chicago, Cook County, and numerous other local, regional, and state stakeholders (see attached [Letters of Support](#)).

The Project will be required to secure permits from numerous state and local agencies. While the final list of relevant permits will be determined in the Phase II design process, the permitting requirements (included as [Exhibit 2G. Potential Required Permits](#)) for Projects P3 and GS19 suggest the need to coordinate with the following agencies:

- **City of Chicago:** Office of Utility Coordination (OUC), Department of Water Management (DWM), Department of Transportation (CDOT), Bureau of Forestry

- **State of Illinois:** Environmental Protection Agency (IEPA), Historic Preservation Agency, Bureau of Design & Environment (BDE), Department of Natural Resources (IDNR)

Federal Transportation Requirements Affecting State and Local Planning

As documented above, the Project has been included in metropolitan and State planning documents (TIP and STIP) as required.

Assessment of Project Risks and Mitigation Strategies

Project risks and specific mitigation solutions are detailed in [Exhibit 2H. Risk Registry](#). The identified risks include real estate acquisition, unanticipated environmental issues, necessary design revisions, cost increases, material supply delays, labor shortages, unidentified utilities, and the local permitting process. As described in [Exhibit 2I. Right of Way Acquisition Plan](#), property acquisition, permanent and temporary easements are required for the project, which could present a minor schedule risk. As discussed in the [Phase I EIS](#), the Project requires the CREATE partners to deliver a range of mitigation strategies for different environmental concerns. These are detailed in [Exhibit X. Environmental Commitments](#), and focus on issues such as: Right-of-Way Acquisition; Environmental Justice; Traffic and Air Quality during Construction; Noise and Vibration; Visual Resources; Preliminary Site Investigations; Tree Replacement; Control of Nuisance Species; Hamilton Park and Leland Giants Park; Historic Preservation of the Damen Avenue Bridge Façade; Local Stakeholder Consultation; IDOT Bridge Office Coordination; and the State and Local Stormwater Permitting Process.

The Project budget also includes \$14.1 million for environmental mitigation, supporting both assessment and remediation work. The Phase II design process, which will include updating the Project's Preliminary Environmental Site Assessments (PESA) and completion of 5 Preliminary Site Assessments (PSI), as recommended in the Project's original 2014 PESA ([Exhibit 2L](#)) will determine specific mitigation needs during construction. All environmental due diligence will be completed in advance of the Phase II final report approval, and before any ROW acquisition activities that are planned as part of this Project (detailed in Right-of-Way Acquisition Plans).

Technical Capacity

The partners have administered over 16 federal grants awarded to projects within CREATE in the last 20 years, totaling \$750 million in funds. The CREATE Program team for EW2A includes the following highly experienced and qualified individuals, ready to support the Project:

- **Association of American Railroads:** Bill Thompson – Chief Engineer
- **Amtrak:** Joseph Shacter – Director, Program Management, Barney Gray – AVP Major Programs
- **Belt Railroad:** Christopher Steinway – General Counsel, Scott Schiemann – Chief Engineer
- **City of Chicago:** Jeff Sriver – Director of Transportation Planning and Programming, Joe Alonzo – Transportation Planner
- **Cook County:** Jesse Elam – Director of Strategic Planning and Policy, Tara Orbon – Assistant Superintendent
- **CSX:** Brett Guarino – Project Manager, Tom Livingston – Vice President, Government Affairs
- **HNTB (IDOT PMO):** David Zarowny – Project Manager

- **Illinois Department of Transportation:** John Oimoen – Deputy Director of Railroads, Jason Osborne – Director, Office of Intermodal Project Implementation
- **Metra:** David Kralik – Director, Planning & Programming, Paul Bobby – Metra PMO
- **Norfolk Southern:** Leo Russell – CTCO Superintendent & Director, Jeff Page – Planning Engineer, Herbert Smith – Regional Vice President, Government Affairs
- **Union Pacific:** Mark Bristol – Assistant Vice President – Network Development
- **WSP (IDOT Corridor Management Consultant):** Chris Ferguson – Project Manager

Among its public and private partners, the CREATE Program has extensive experience completing projects with similar scope. 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. The participating railroads (including Norfolk Southern, Metra, Belt Railroad, and CSX) will oversee the design and construction process, with IDOT and City of Chicago assisting with project oversight and permitting coordination. This Project has followed all federal guidelines associated with the receipt of federal funds. The administration of the Project will be conducted in close coordination between the infrastructure owners, funding partners and U.S. DOT. This approach will balance the needs of multiple stakeholders and users, as detailed in [Exhibit 2J. CREATE Partnerships & Management](#) and [Exhibit 2K. CREATE - Joint Statement of Understandings](#). CREATE partners will release all requests for proposals for design and bids for construction using established and federally approved processes.