



Illinois Department of Transportation

Office of the Secretary
2300 South Dirksen Parkway / Springfield, Illinois / 62764
Telephone 217/782-6149

September 21, 2026

Ms. Danielle Gosselin
Office Environmental Analysis
Surface Transportation Board (Docket No. FD 36873)
395 E Street SW
Washington, DC 20423

RE: Docket No. FD 36873, Union Pacific Corporation and Union Pacific Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company; Preliminary Consultation

Dear Ms. Gosselin:

The Illinois Department of Transportation (IDOT) submits the attached Preliminary Consultation Response regarding the proposed Union Pacific–Norfolk Southern transaction in Finance Docket No. 36873. The response addresses OEA's August 19, 2026 Preliminary Consultation Letter and identifies Illinois-specific transportation and community interests, environmental issues, and information needs that should inform the scope and preparation of the Environmental Impact Statement (EIS).

IDOT is responding as the state transportation agency with jurisdiction over highway-rail crossings, the Illinois Service intercity passenger rail program, and coordination with Metra and regional planning partners. This response does not address the merits of the transaction. Its purpose is to help make sure the EIS captures the full set of Illinois locations, resources, transportation interfaces, and data needs that may not be apparent from the Applicants' filings alone.

The Applicants' submitted operating data and OEA's preliminary consultation materials identify a number of Illinois rail segments, yards, intermodal facilities, and transaction-related capital improvements that may warrant environmental review. IDOT's response builds on that information by identifying additional locations and transportation interfaces where transaction-related operating changes may intersect with highway-rail crossings, community access, passenger rail, public investments, yards and terminals, rail junctions, and other State and local transportation conditions.

The response identifies additional Illinois locations and transportation interfaces that warrant consideration within the EIS because of projected or expected routing changes, rail junctions and yards, highway-rail crossings, passenger rail, public investments, and community impacts. These include locations in northeastern Illinois, central Illinois, and the Metro East/St. Louis gateway that may not be fully captured by segment-level operating data alone.

The response also highlights highway-rail crossing and community-impact concerns, particularly where increased or rerouted train activity could affect roadway delay, emergency response, school and transit access, or communities with limited grade-separated alternatives. Passenger rail and public investment are another important part of the Illinois review. Freight movements associated with the proposed transaction may share, cross, or otherwise interact with Metra and Amtrak corridors, the Springfield 10th Street Rail Consolidation Project, and planned passenger rail investments.

IDOT also identifies transaction-related capital improvements in Illinois that require site-specific review, including the Griggsville Siding Extension, Decatur Double Track, CP Brush improvements, Vance Siding Extension, Eldon–Ross Lane centralized traffic control improvements, and the Tilton Universal Crossover. The EIS should consider both the construction footprint and the operational effects associated with these improvements.

A central issue in the response is that the current record does not yet provide a fully consistent picture of how transaction-related traffic would be routed through Illinois. Differences among the Applicants' segment-level data, operating descriptions, and subsequent routing information affect which communities, crossings, passenger corridors, yards, terminals, and other transportation resources may experience transaction-related effects. Section 5 therefore identifies the operating assumptions and information gaps that should be resolved before the Illinois analysis is completed, while Section 6 identifies Illinois-specific and regional transportation data, environmental and planning studies, resource databases, and other supporting records that can help address those gaps.

Based on this review, IDOT asks that OEA to:

- Reconcile the Applicants' segment-level traffic forecasts with their stated operating plans and subsequent routing information so that the EIS reflects where transaction-related trains are expected to operate in Illinois;
- Consider the additional Illinois locations and transportation interfaces identified by IDOT where routing, junctions, yards, highway-rail crossings, passenger rail, public investments, or community-access conditions may warrant further analysis;
- Define the construction footprints and affected resources for the proposed transaction-related capital improvements in Illinois and evaluate construction and operational effects together where appropriate;
- Evaluate the environmental consequences to socioeconomic conditions, emergency vehicle access, and temporary construction effects associated with the project. This is in addition to resource categories considered in recent environmental review documents and consistent with STB National Environmental Policy Act (NEPA) guidance at 49 CFR 1105.7(e).;
- Evaluate passenger rail and public investment interfaces, where merger-related freight movements may share, cross, or otherwise interact with Metra, Amtrak, and planned passenger services;

- Resolve Applicants' operating assumptions and information gaps, including freight routing, train volumes and characteristics, yard and terminal activity, crossing conditions, passenger-rail capacity assumptions, facility truck activity, capital-improvement footprints, and hazardous-material and safety information; and
- Use Illinois-specific and regional transportation data, environmental and planning studies, resource databases, and other supporting records to supplement and validate the Applicants' information and support location-specific analysis.

In addition to the OEA requests listed above, and should the merger be approved, IDOT recommends the STB to implement an oversight period of no less than 10 years with conditions to mitigate safety impacts and further evaluation at 5-years, 7.5-years and 10-years.

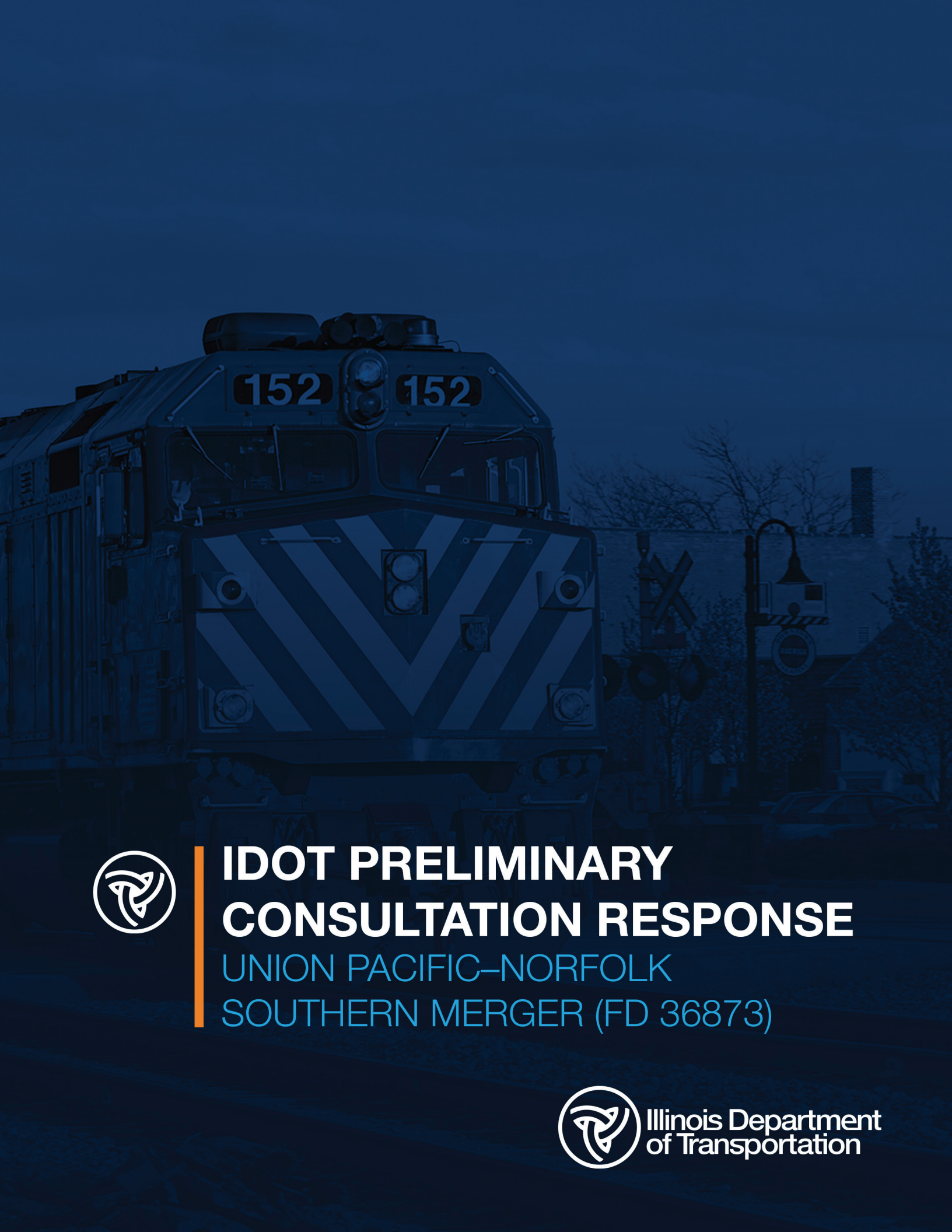
The attached Preliminary Consultation Response provides the supporting analysis for these requests, including the Illinois locations and facilities that warrant review, the transportation and community effects that should be evaluated, passenger rail and public investment interfaces, remaining operating and information gaps, and the data and studies that can support OEA's Illinois analysis.

IDOT appreciates the opportunity to provide input through this consultation and requests continued coordination with the OEA as the operating assumptions, affected geography, and scope of environmental analysis are further developed.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gia Biagi', written in a cursive style.

Gia Biagi
Secretary

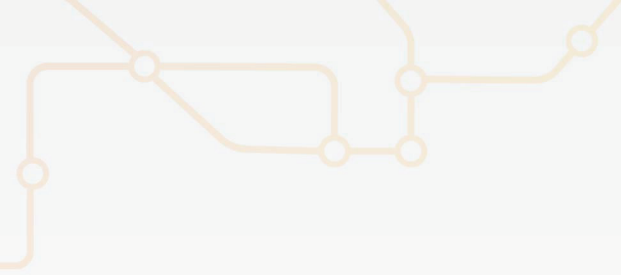


IDOT PRELIMINARY CONSULTATION RESPONSE

UNION PACIFIC-NORFOLK
SOUTHERN MERGER (FD 36873)



Illinois Department
of Transportation



IDOT PRELIMINARY CONSULTATION RESPONSE

Union Pacific–Norfolk Southern Merger (FD
36873)

Illinois Department of Transportation

September 21, 2026



TABLE OF CONTENTS

1.0	IDOT's Preliminary Consultation Response: Purpose and Scope.....	1-1
2.0	Illinois Locations and Facilities Requiring EIS Review	2-1
2.1	OEA Preliminary Screening and Illinois Review Geography	2-1
2.2	Additional Operating Locations and Network Interfaces.....	2-3
2.3	Highway Rail Crossings, Roadway Access, and Community Access	2-5
2.4	Passenger Rail and Public Investment Interfaces	2-8
2.5	Yards, Terminals, and Facility Access.....	2-9
2.6	Transaction Related Capital Improvements	2-9
2.7	Operating Assumptions and Geographic Scope	2-10
3.0	Transportation and Community Effects OEA Should Analyze.....	3-1
4.0	Passenger Rail Effects.....	4-1
5.0	Data, Assumptions, and Information Gaps	5-1
6.0	Illinois Data and Studies OEA Should Use.....	6-1
Appendix A.	Location-By-Location Evidence Table.....	A-1



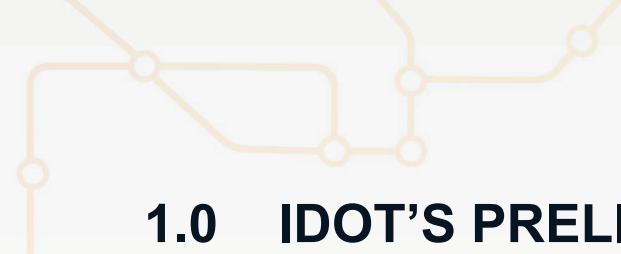
LIST OF TABLES

Table 2-1	Additional Illinois Operating Locations and Network Interfaces for EIS Review	2-3
Table 2-2	Passenger Rail and Public Investment Interfaces.....	2-8
Table 3-1	Potential Transportation and Community Effects.....	3-3
Table 4-1	Illinois Passenger Rail Segments and Freight Interfaces.....	4-2
Table 5-1	Information Gaps Requiring Resolution for the Illinois Analysis.....	5-1
Table 6-1	Recommended Data and Studies	6-2



LIST OF FIGURES

Figure 2.1	Rail Network Lines and Points of Interest	2-2
Figure 2.2	High Vehicle Traffic Crossings	2-7



1.0 IDOT'S PRELIMINARY CONSULTATION RESPONSE: PURPOSE AND SCOPE

This response addresses the proposed control transaction between Union Pacific Corporation and Norfolk Southern Corporation, Docket No. FD 36873. On May 28, 2026, the Board issued Decision No. 21, accepting the applicants' revised application and holding the proceeding in abeyance pending supplemental information. That decision also set a modified environmental review process for this case. The usual Draft EIS and its comment period have been waived. OEA will issue a single Notice of Intent followed by one EIS, informed by consultation responses like this one. On August 19, 2026, OEA issued a Preliminary Consultation Letter to state and federal agencies, Tribal governments, and elected officials, setting a response deadline of September 21, 2026. This document is IDOT's response to that request.

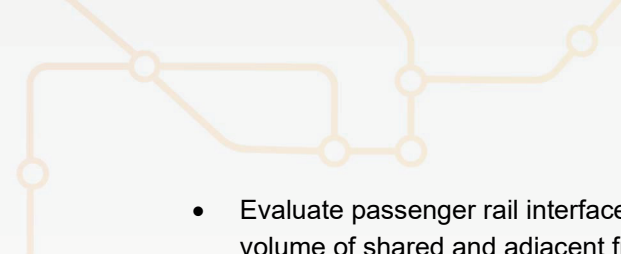
IDOT is responding as the state transportation agency with jurisdiction over highway-rail crossings, the Illinois Service intercity passenger rail program, and coordination with Metra and regional planning partners. IDOT's role in this consultation is to identify Illinois-specific transportation and community interests that should inform the scope of OEA's environmental review. This response does not address the transaction's merits. The Board evaluates that separately under 49 U.S.C. § 11324. IDOT's task here is narrower. It is to make sure the EIS captures the full set of Illinois locations, resources, and data needs that the applicants' own filings may not surface on their own.

Illinois is the primary freight rail hub in North America with nearly 1,300 trains passing through the region daily, and one-fourth of the nation's freight rail traffic heading to, from, or through Chicago. The state is planning for significant freight and passenger rail growth along with Metra and Amtrak with planned expansions and improvements to reduce congestion, reliability and passenger conflicts. Because the usual Draft EIS comment period has been waived, this consultation stage is the primary opportunity for IDOT to shape what OEA studies before the Notice of Intent and (NOI) and EIS is prepared.

This response was compiled from two sources. The first is the applicants' own filed data, primarily the July 27, 2026 Master Segment Tables and OEA's preliminary threshold screening based on that data. The second is IDOT's independent knowledge of Illinois transportation assets, including passenger rail corridors, highway-rail crossings, and locally significant rail junctions that do not necessarily appear in the applicants' segment-level screening. Sections 2 through 6 and Appendix A describe this analysis in full. This section summarizes the results and the requests that follow from them.

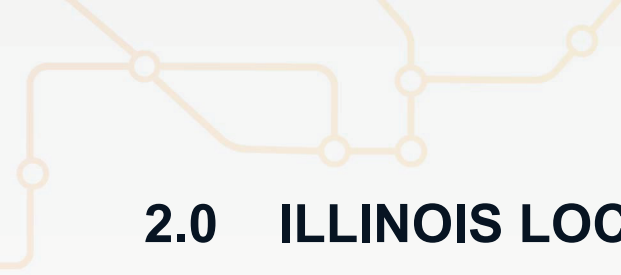
IDOT asks that OEA do the following as it prepares the NOI and the EIS that follows:

- Reconcile the applicants' segment-level traffic forecasts with their stated operating plans and any subsequent routing changes, so the EIS geography reflects where transaction-related trains would actually run in Illinois.
- Define construction footprints and affected resources for each proposed capital improvement site in Illinois, regardless of whether the associated segment exceeds the Board's environmental-analysis threshold.
- Apply the expanded set of resource categories IDOT recommends in Section 3 rather than limiting the analysis to categories the applicants' screening identifies on its own.

- 
- Evaluate passenger rail interfaces specifically, including the locations identified in Section 4, given the volume of shared and adjacent freight and passenger operations across the state.
 - Resolve the operating and data gaps identified in Section 5, including uncertainties regarding routing, train volumes and characteristics, yard and terminal activity, crossing conditions, passenger-rail capacity assumptions, facility truck traffic, and capital-improvement footprints.
 - Use the Illinois-specific and regional transportation data, environmental and planning studies, resource databases, and other supporting records identified in Section 6 to supplement and validate the Applicants' information and support location-specific analysis.

Key takeaways:

- Illinois has more affected locations and passenger rail interfaces than the applicants' segment-level screening identifies on its own.
- The Chicago terminal area, especially the NS Chicago Line near 47th Street and the Metra UP-West corridor, shows the largest combined freight growth and passenger exposure in the state.
- Downstate corridors, including the Springfield to St. Louis Lincoln Service corridor and the Metro East gateway, also warrant review despite smaller freight increases, given their passenger rail role.
- Significant gaps remain in the current record. Routing assumptions, train length and timing data, yard-level activity, and capital improvement footprints are not yet clear enough to support a complete environmental analysis.
- IDOT recommends an expanded set of resource categories for the EIS and identifies an initial set of potential mitigation measures for OEA to consider and further develop through the environmental review.



2.0 ILLINOIS LOCATIONS AND FACILITIES REQUIRING EIS REVIEW

The proposed transaction would change rail operations and facility activity at multiple locations across Illinois. OEA has preliminarily identified rail line segments, rail yards, and intermodal facilities in Illinois that could experience transaction-related changes above the Board's environmental-analysis thresholds and has identified transaction-related capital improvements that will be evaluated in the EIS. Building on that preliminary screening, this section identifies Illinois transportation resources, communities, passenger rail and public investment interfaces, crossing conditions, and additional operating locations that should inform the geographic scope and level of analysis in the EIS.

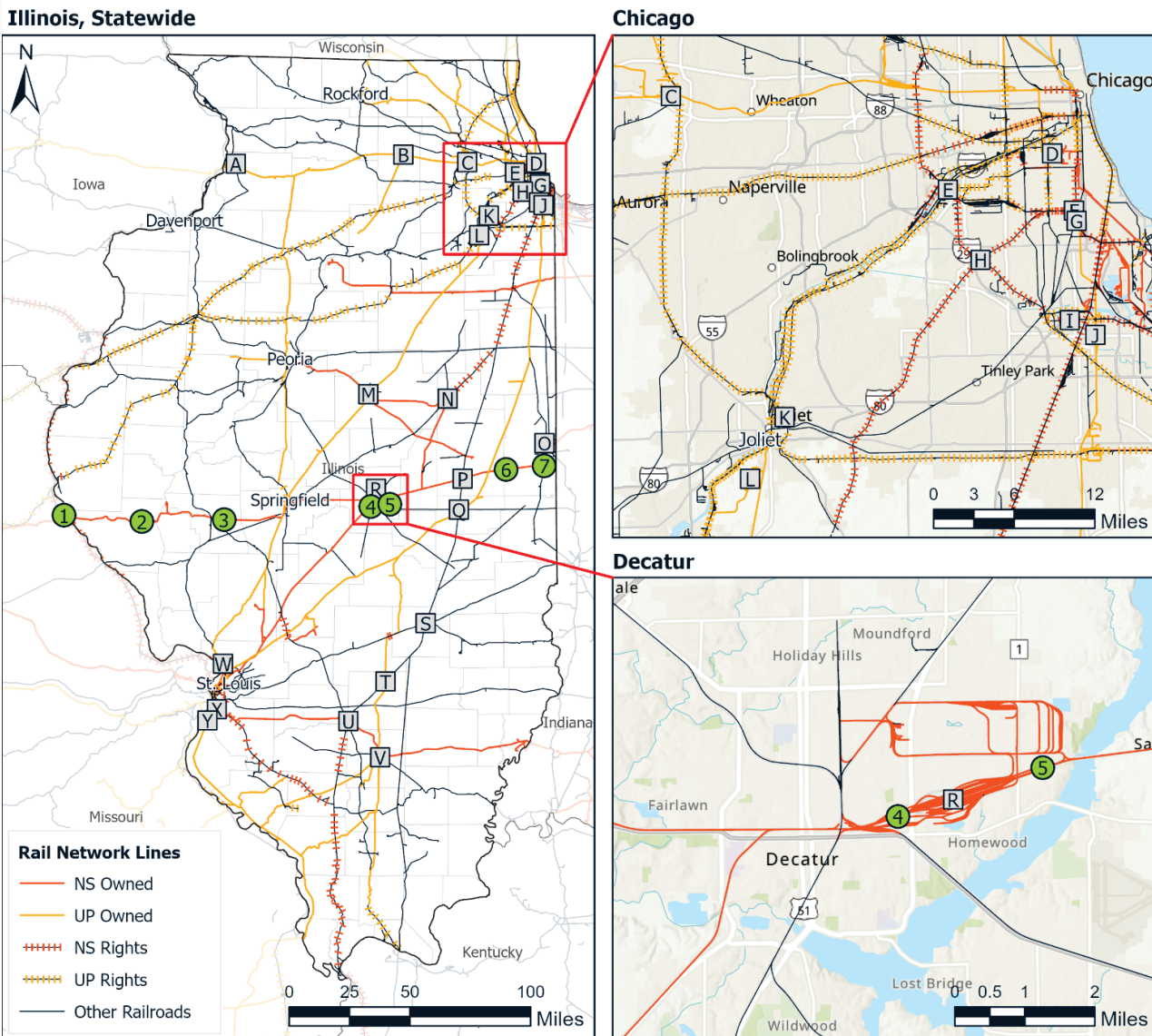
This section identifies where the screened and otherwise expected operating changes intersect with state and local conditions that may require more detailed analysis, and where additional information is needed to define the affected geography. These locations include highway-rail crossings and community access points, passenger rail corridors and junctions, rail yards and terminal access points, existing and planned public transportation investments, and locations where current operating information indicates potential routing or capacity issues that are not fully reflected in the threshold-based screening.

2.1 OEA Preliminary Screening and Illinois Review Geography

OEA's preliminary review identified rail line segments, rail yards, and intermodal facilities in Illinois that could experience transaction-related operational changes above the Board's environmental-analysis thresholds. OEA also identified transaction-related capital improvements in Illinois that will be evaluated in the EIS. For rail lines, the Board's thresholds are based on projected increases in gross ton miles or trains per day, with lower thresholds applied in nonattainment and Class I areas. For rail yards and intermodal facilities, the thresholds are based on changes in yard activity or truck traffic. These screening results provide the initial geography for environmental review in Illinois.

Building on that preliminary screening, IDOT has identified additional Illinois locations and transportation interfaces that should inform the geographic scope and level of analysis in the EIS. These include locations where projected or expected operating changes intersect with passenger rail, highway rail crossings, community access, public transportation investments, rail junctions and operating constraints, and other state and local transportation conditions. Figure 2.1 shows OEA's preliminary Illinois screening, proposed transaction-related capital improvements, and the additional Illinois locations and corridors identified for further review. The following subsections describe these locations and the state and local conditions that may warrant more detailed analysis in the EIS.

FIGURE 2.1 RAIL NETWORK LINES AND POINTS OF INTEREST



Planned Capital Improvement Locations

- ① Hannibal Bridge Speed Upgrade
- ② Griggsville Siding Extension
- ③ Hannel Siding Extension
- ④ Decatur Double Track
- ⑤ CP Brush Phase II
- ⑥ Vance Siding Extension
- ⑦ Tilton Universal Crossover

Rail Facilities & Junctions

- | | | |
|--------------------------|----------------------|-----------------------|
| Ⓐ Clinton & Morrison | Ⓙ Dolton Yard Center | Ⓢ Effingham |
| Ⓑ DeKalb | Ⓚ East Joliet | Ⓣ Kinmundy |
| Ⓒ West Chicago/JB Tower | Ⓛ Global IV | Ⓤ Centralia |
| Ⓓ CP 518 | Ⓜ Bloomington | Ⓥ Mount Vernon |
| Ⓔ Argo Junction | Ⓝ Gibson | Ⓦ Wood River |
| Ⓕ Belt Junction | Ⓞ Danville | Ⓧ East St. Louis Yard |
| Ⓖ CP 81st Street | Ⓟ Tolono | Ⓨ Dupo Yard |
| Ⓗ Chicago Ridge Junction | Ⓠ Tuscola | |
| Ⓙ Blue Island Yard | Ⓡ Decatur | |



Source: Cambridge Systematics analysis based on Applicants' July 27, 2026 Updated Master Segment Tables; UP-NS operating and capital-improvement information; OEA Preliminary Consultation materials; IDOT review; and Quandt Consultants' technical analysis of the proposed merger.

2.2 Additional Operating Locations and Network Interfaces

Beyond the locations identified through OEA’s preliminary threshold screening, IDOT conducted additional review to identify rail junctions, yards, routing interfaces, and operating locations that may warrant closer consideration in the EIS. These locations are not necessarily outside the geography already identified by OEA. Rather, they are places where the operational significance of the merger may not be fully described by a segment- or facility-level threshold screen because effects may depend on routing, junction performance, yard access, interactions among multiple railroads, or connections with passenger rail and other transportation resources.

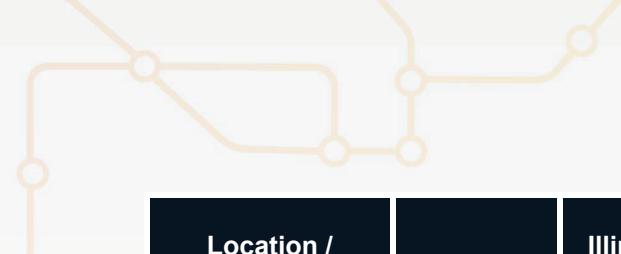
Table 2-1 summarizes these additional operating locations and network interfaces. In northeastern Illinois, there are several locations where proposed or expected routing changes could affect network performance, including West Chicago/JB Tower, the former EJ&E and East Joliet Yard, Joliet/Elwood and Global IV, CP 518, CP 81st Street, Argo, Belt Junction, Blue Island Yard, Dolton Junction/Yard Center, and Chicago Ridge. These locations represent potential bottlenecks, routing interfaces, or freight/passenger conflict points within the broader Chicago terminal network.

Downstate, additional locations of interest are Danville, Effingham, Centralia, Tolono, Tuscola, Gibson City, Kinmundy, Mount Vernon, Dupu, and other locations in the Metro East region. These areas contain railroad crossings, junctions, yards, and connections among UP, NS, CN, CSX, and other carriers. Several also intersect passenger rail routes or serve major local rail-dependent industries.

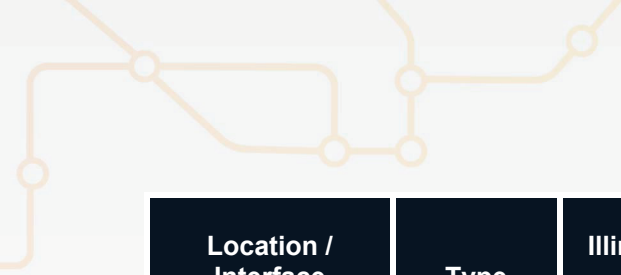
The significance of these locations should be evaluated using the most current and internally consistent transaction operating assumptions. IDOT has identified that some routing changes described in the proposed operating plan and subsequent announcements are not fully reflected in the July 27 segment-level data, particularly for the former EJ&E and traffic expected to be diverted through the Kansas City and St. Louis gateways. OEA should therefore confirm the expected transaction-related routing through these locations and use reconciled operating assumptions to determine the appropriate geographic scope and level of environmental and transportation analysis in the EIS.

TABLE 2-1 ADDITIONAL ILLINOIS OPERATING LOCATIONS AND NETWORK INTERFACES FOR EIS REVIEW

Location / Interface	Type	Illinois Transportation Context	Why Additional Review May Be Warranted
West Chicago / JB Tower	Junction / routing interface	UP Geneva Subdivision connection with CN former EJ&E; Metra UP West Line operates through the area	Proposed rerouting between UP and CN would use a single-track, low-speed connection and require crossover movements across the Geneva Subdivision, creating a potential constraint for freight and passenger operations. The connection is limited to approximately 10 mph, and available operating analysis indicates that a 10,000-foot train could require approximately 24 minutes or more to complete the movement and clear conflicting routes.
CN former EJ&E, West Chicago–East Joliet–Matteson	Corridor / routing interface	Major Chicago bypass route used by CN and intersecting	Additional UP–NS traffic would be introduced onto a largely single-track corridor with existing traffic and capacity constraints.



Location / Interface	Type	Illinois Transportation Context	Why Additional Review May Be Warranted
		other freight and passenger routes	
East Joliet Yard and approaches	Yard / network interface	CN yard with approaches in multiple directions and connections to the former EJ&E	Changes in through traffic and yard movements could affect yard access and network fluidity in the Joliet area.
Joliet / Elwood / Global IV	Terminal / passenger interface	UP Chicago–St. Louis corridor, Global IV, Lincoln Service and Texas Eagle	Additional freight movements between the former EJ&E and Global IV could affect terminal operations and passenger train performance.
CP 518	Junction / passenger interface	Connection between the Western Avenue Corridor and NS 51st Street Yard; Metra Southwest Service and Amtrak routes nearby	Merger-related routing changes could affect a constrained junction used by both freight and passenger services.
CP 81st Street	Junction	UP, NS, and BRC routes join and cross	Concentration of multiple freight routes creates potential operating conflicts not evident from individual segment forecasts alone.
Argo Junction	Junction / passenger interface	IHB location where CN, BNSF, and BRC connect and Amtrak and Metra Heritage routes cross	Freight routing changes could affect a multi-railroad junction with passenger service exposure.
Belt Junction	Junction	BRC network location affected by changing Chicago terminal flows	Changes in UP–NS and CSX routing could alter congestion and traffic distribution through the BRC system.
Blue Island Yard	Yard / routing interface	IHB yard serving multiple Chicago terminal movements	Longer or additional trains routed over the IHB could affect yard entry, exit, and terminal fluidity.
Dolton Junction / Yard Center	Junction / passenger interface	IHB, CSX, and UP connections; Amtrak Cardinal uses the corridor	Potential freight-routing changes could affect a multi-railroad junction also used by passenger service.
Chicago Ridge	Junction / passenger interface	IHB–NS crossing; Metra Southwest Service	The level of congestion may depend on how many transaction-related trains are routed over the IHB.
Danville	Corridor / junction location	Eastern end of the Illinois portion of the Kansas City–Detroit route	Additional Kansas City Gateway traffic could increase activity through an existing rail operating node.
Effingham	Rail crossing / passenger interface	CSX crosses CN near the Amtrak station	Additional cross traffic could affect the junction and passenger rail operations in the vicinity of the station.
Centralia	Rail crossing / passenger interface	NS and BNSF cross the CN Chicago–New Orleans route near the Amtrak station	Additional St. Louis Gateway traffic could increase cross movements near passenger operations.
Tolono	Rail crossing	UP crosses CN south of Champaign	Additional Kansas City Gateway traffic could increase activity at the UP–CN crossing.
Tuscola	Multi-railroad junction	UP and CSX cross CN	Potential changes in UP/CN and CSX traffic could increase operating complexity at a location where several routes intersect.



Location / Interface	Type	Illinois Transportation Context	Why Additional Review May Be Warranted
Gibson City	Junction / local industry interface	NS, CN, and Bloomer Line connect; local grain and industrial customers	Additional traffic could affect a multi-railroad junction serving local industries and connecting regional routes.
Kinmundy	Junction / routing interface	UP and CN crossing; interchange activity associated with Salem	Potential increases on both UP and CN and possible run-through traffic could affect junction operations.
Mount Vernon	Multi-railroad junction	NS, UP, and CSX routes intersect	Additional traffic on the UP and NS routes could increase operating interactions at a three-railroad junction.
Dupo / Alton & Southern Yard	Yard / Metro East interface	Major UP-owned A&S yard within the St. Louis gateway	Potential gateway traffic changes could affect yard activity and Metro East network operations.
Other Metro East locations, including East St. Louis, Venice, Granite City, Alton, and Wood River	Gateway / network interface	Dense rail network, Mississippi River crossings, passenger and freight routes	Additional St. Louis Gateway traffic could affect multiple junctions, yards, river crossings, and passenger rail interfaces across the Metro East region.

Source: Cambridge Systematics analysis based on Applicants' July 27, 2026 Updated Master Segment Tables; UP-NS operating and routing information; OEA Preliminary Consultation materials; IDOT review; and Quandel Consultants' technical analysis of the proposed merger.

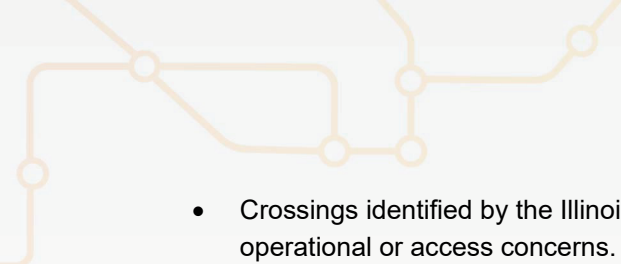
2.3 Highway Rail Crossings, Roadway Access, and Community Access

Projected transaction related changes in rail activity should be considered in relation to Illinois's public highway rail crossing network and the roadway and community functions that depend on those crossings. Increases in train frequency, changes in routing, and associated changes in train operations can affect the frequency or duration of crossing blockages and, in turn, roadway mobility, emergency access, school transportation, transit operations, and community connectivity.

The Applicants identify public at grade crossings associated with rail segments and facilities that exceed the Board's environmental analysis thresholds. In defining the locations that warrant closer review in Illinois, additional crossing characteristics should also be considered, including roadway traffic volumes, the availability of grade separated alternatives, crash history, documented blockage conditions, emergency access, and concerns identified by state and local agencies.

IDOT has identified several considerations that can help identify locations where projected transaction related changes may have greater consequences for the surrounding transportation network and community. Particular attention should be given to:

- Crossings on higher volume roadways;
- Communities that lack a practical grade separated alternative;
- Locations with relevant crash history or documented blockage concerns; and

- 
- Crossings identified by the Illinois Commerce Commission or local agencies as having existing operational or access concerns.

The EIS should also identify whether transaction-related crossing improvements overlap with or affect projects programmed through the ICC 2026–2031 Capital Railroad Crossing Program. This would help distinguish existing programmed improvements from improvements that may be needed as a result of transaction-related operating or capital changes.

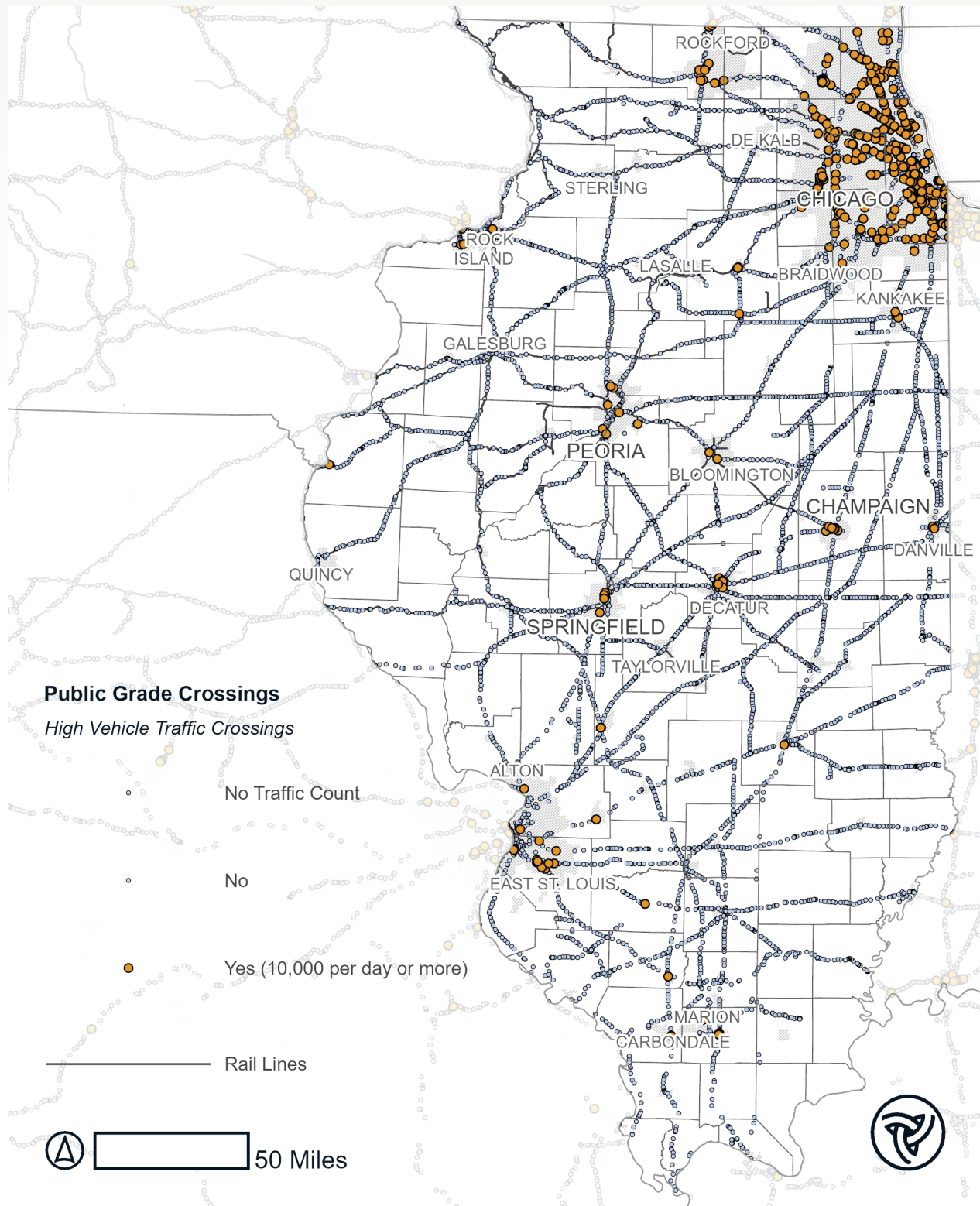
Several Illinois communities may warrant location-specific review based on crossing exposure, community access, emergency-response routes, rail operating conditions, and the availability of grade-separated alternatives. Decatur and Morrison are discussed below as illustrative examples of these conditions and are not intended to represent an exhaustive list of affected communities.

Local conditions are particularly important in Decatur, where rail activity intersects an extensive network of public crossings and local streets. Concerns include train frequency and length, routing, yard and switching activity, gate down conditions, emergency response routes, transit operations, student transportation, and locations with limited alternative vehicle access. Decatur should therefore be evaluated not only as a rail operating location but also as a concentration of roadway and community access interfaces.

Morrison also warrants closer review. Rail operations associated with the Mississippi River crossing can result in train backups through the community, with potential implications for school buses, fire and police response, medical access, and other local travel. Transaction related changes affecting the frequency, length, or routing of trains through Morrison should be evaluated in light of these existing access conditions.

Figure 2.2 identifies public highway rail crossings located along corridors where the transaction is projected or expected to increase or reroute train activity and combines those projected changes with available information on existing crossing conditions. Where data are available, the figure identifies roadway volumes, communities without a grade separated alternative, crash history, documented blockage conditions, and locations identified by state or local agencies. The figure is intended to show where transaction related rail changes overlap with existing crossing exposure or access concerns and to help identify locations for more detailed analysis of roadway delay, safety, emergency access, and community mobility in the EIS.

FIGURE 2.2 HIGH VEHICLE TRAFFIC CROSSINGS



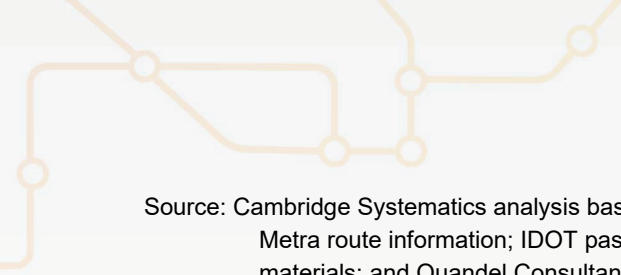
Source: Cambridge Systematics analysis based on Applicants' July 27, 2026 Updated Master Segment Tables and crossing information; OEA Preliminary Consultation materials; Illinois Commerce Commission crossing information; IDOT and local-agency information; and Quandel Consultants' technical analysis of the proposed merger.

2.4 Passenger Rail and Public Investment Interfaces

Illinois has substantial existing and planned public investment in intercity and commuter passenger rail. The geographic scope of the EIS should therefore account for locations where transaction related freight activity may share, cross, or otherwise interact with passenger rail corridors, junctions, stations, or planned transportation investments. Table 2-2 identifies these interfaces geographically. Potential effects on passenger rail operations and service are addressed in Section 4.

TABLE 2-2 PASSENGER RAIL AND PUBLIC INVESTMENT INTERFACES

Passenger Service/ Investment	Location or Interface	Geographic Relevance to the EIS
Metra UP West Line	Elburn, La Fox, Geneva, West Chicago, Winfield	Transaction related freight movements occur on or connect with the corridor carrying commuter rail service.
Metra Rock Island District	Joliet area	Freight routing through the Joliet area intersects passenger rail infrastructure.
Metra Heritage Corridor	Joliet area	Freight and passenger operations share or intersect infrastructure in the Joliet area.
Metra Southwest Service	CP 518, Belt Junction, Chicago Ridge	Freight routing through Chicago terminal junctions intersects locations used by commuter rail service.
Amtrak	CP 518, Dolton Junction, Yard Center	Transaction related freight movements intersect junctions used by Amtrak service.
Amtrak	51st Street–Porter corridor	Freight movements occur along a corridor also used by intercity passenger trains.
Amtrak Lincoln Service / Texas Eagle	Joliet–Elwood	Freight movements associated with the Joliet/Elwood area intersect the Chicago–St. Louis passenger corridor.
Amtrak Lincoln Service / Texas Eagle	Iles–Hazel Dell, Springfield	Transaction related freight movements intersect or cross passenger rail infrastructure in the Springfield area.
Amtrak	Godfrey–St. Louis corridor	Freight movements in the Metro East/St. Louis gateway intersect passenger rail geography.
Amtrak	Tolono	Freight movements intersect the passenger rail corridor at a rail junction.
Amtrak	Tuscola	Freight movements intersect the passenger rail corridor at a rail junction.
Amtrak	Effingham	Freight cross traffic intersects the passenger rail corridor near the station area.
Amtrak	Centralia	Freight movements intersect the passenger rail corridor near the station area.
10th Street Rail Consolidation	Springfield	Major public rail investment located within an area where transaction related freight routing may change.
Planned passenger service/public investment	DeKalb–Elburn	Planned passenger rail investment overlaps a corridor where future freight conditions are relevant to the EIS geography.



Source: Cambridge Systematics analysis based on Applicants' July 27, 2026 Updated Master Segment Tables; Amtrak and Metra route information; IDOT passenger-rail and public-investment information; OEA Preliminary Consultation materials; and Quandel Consultants' technical analysis of the proposed merger.

IDOT recommends that OEA use the most current transaction operating assumptions to confirm where freight traffic would share, cross, or otherwise interact with these passenger rail corridors and public investments. Existing state supported Amtrak corridors, Metra infrastructure, the 10th Street Rail Consolidation Project, and planned passenger investment between DeKalb and Elburn are transportation resources that should be reflected in the geographic scope of the EIS.

2.5 Yards, Terminals, and Facility Access

OEA's preliminary screening identifies Illinois yards, intermodal terminals, and automotive facilities where projected transaction related activity may exceed the applicable environmental analysis thresholds. Applicant projections for facilities such as Global 2, 47th Street, Hegewisch, and Centreville provide the quantitative starting point for the environmental review. The EIS should also consider other yards and terminal locations where changes in routing, interchange, switching, or through traffic could affect surrounding transportation conditions even where comparable facility level truck forecasts are not currently available.

In northeastern Illinois, these locations include Global IV at Elwood, East Joliet Yard, Blue Island Yard, and other Chicago terminal yards and junctions that may be affected by changes in the routing of UP–NS traffic through the former EJ&E, IHB, BRC, and connecting railroads. East Joliet Yard is particularly relevant because transaction related trains routed over the former EJ&E would approach or pass through the Joliet area, while Global IV creates an additional interface between rail terminal activity, roadway access, and the Chicago–St. Louis passenger corridor. Blue Island and other Chicago terminal facilities may also experience changes in traffic distribution depending on how the merged railroad uses the available Chicago routing alternatives.

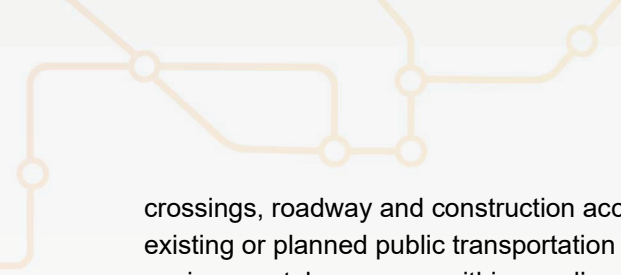
Downstate, Bloomington Yard, the Decatur yard and locomotive facilities, and Dupo/Alton & Southern Yard warrant consideration. In Decatur, changes in yard activity, switching, locomotive shop activity, and industrial service should be evaluated together with nearby public crossings and roadway access. Dupo is a major Alton & Southern facility within the Metro East gateway, where changes in St. Louis gateway traffic could affect yard operations and surrounding transportation activity.

2.6 Transaction Related Capital Improvements

OEA has indicated that proposed transaction related capital improvements will be evaluated in the EIS as appropriate, independently of whether the associated rail segment or facility exceeds an operating threshold. These projects therefore form a separate component of the Illinois environmental review geography.

The Applicants identify several proposed mainline capacity and operational improvements in Illinois, including the Griggsville Siding Extension, Decatur Double Track, CP Brush improvements, Vance Siding Extension, Eldon–Ross Lane centralized traffic control improvements, and the Tilton Universal Crossover. These improvements would occur at different points within the Illinois network and vary in the amount and type of physical construction required.

For each location, the EIS should define the proposed construction footprint and identify surrounding resources that could be affected. Depending on the project, relevant considerations may include public highway rail



crossings, roadway and construction access, adjacent communities and land uses, passenger rail infrastructure, existing or planned public transportation projects, utilities, water resources, cultural resources, and other environmental resources within or adjacent to the project area.

In Decatur, the relationship between the proposed capacity improvements and existing yard operations also warrants review. Available operating analysis indicates that the proposed bypass-main configuration could affect access to the yard and increase train dwell on yard approaches. OEA should evaluate these operational effects together with the construction-related effects of the proposed improvements.

Where a proposed capital improvement is located within an area that also experiences a projected increase or rerouting of train activity, the construction and operational components should be considered together so that the EIS captures the full transaction related change at that location.

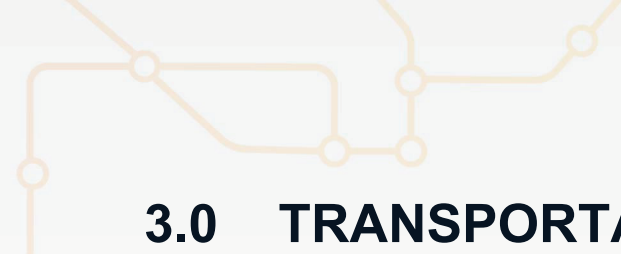
2.7 Operating Assumptions and Geographic Scope

The current record does not yet provide a fully consistent picture of how all transaction related traffic would be routed through Illinois. This is important for environmental review because the location and magnitude of operating changes determine which communities, crossings, passenger rail corridors, yards, and other transportation resources may be affected.

The July 27 segment level data show substantial projected growth on portions of the Geneva Subdivision east of West Chicago. At the same time, UP, NS, and CN have described an operating arrangement under which approximately 12 trains per day would be diverted at West Chicago to the CN former EJ&E, reducing the amount of traffic continuing east through the traditional Chicago terminal routing. The July 27 data also show relatively limited changes on portions of the Chicago–St. Louis corridor near Joliet and Elwood and in the Springfield area, while other descriptions of the proposed operating plan anticipate diversion of traffic away from Chicago through the Kansas City and St. Louis gateways.

These differences affect more than projected train counts. They affect the geographic distribution of potential environmental and transportation effects across northeastern, central, and southwestern Illinois. For example, routing additional trains over the former EJ&E would shift potential effects toward West Chicago, East Joliet, Joliet and Elwood, and other locations along that corridor, while greater use of the Kansas City or St. Louis gateways could increase the relevance of Springfield, Decatur, Metro East, and connecting downstate routes.

OEA should therefore confirm the transaction related routing assumptions and reconcile the segment level forecasts with the proposed operating plan and subsequent routing arrangements before establishing the final geographic scope of analysis. The EIS should use a consistent set of operating assumptions so that the locations evaluated for crossing, roadway, community, passenger rail, facility, and other environmental effects correspond to the traffic patterns expected under the transaction.



3.0 TRANSPORTATION AND COMMUNITY EFFECTS OEA SHOULD ANALYZE

Based on the Illinois locations, corridors, facilities, and transportation interfaces identified in Section 2, IDOT recommends that OEA evaluate the potential environmental and transportation effects summarized in Table 3.1. The analysis should reflect the transaction-dependent operating and construction changes at each location.

The recommended areas of analysis are informed by the STB's NEPA regulations at [49 CFR 1105.7\(e\)](#), recent National Environmental Policy Act (NEPA) review documents prepared in the area, and the recent Canadian Pacific-Kansas City Southern Acquisition Final Environmental Impact Statement (the CP-KCS Merger Final EIS). The CP-KCS Merger FEIS is the most recent comparable STB rail-merger case and was a primary source used to identify which resource categories a similar merger might address.

In addition to the resource topics evaluated in the CP-KCS Merger FEIS, IDOT recommends evaluating emergency vehicle access, socioeconomic and community effects, and temporary construction effects associated with the transaction-related capital improvements. Although proposed construction is consistent with staying within the existing corridor, the applicants have not confirmed that construction will occur within disturbed Right of Way. The applicants similarly claim that on-time, performance would not deteriorate post-merger, but there is no evidence to support this claim. The proposed transaction is likely to impact to passenger and commuter rail service quality and could compromise Amtrak/Metra on-time performance on shared corridors. Our understanding is that the STB will evaluate this separately in its determination of the transportation merits and public-interest determination. Given the uncertainty surrounding the area of effect, we recommend that the environmental review consider the socioeconomic effects associated with disruptions in passenger service reliability, capacity, dispatching, and operating conditions.

In addition to the resource-specific mitigation topics summarized in Table 3.1, IDOT recommends that OEA establish a minimum floor of mitigation commitments for the applicants. These measures are drawn primarily from commitments made in the CP-KCS Merger Final EIS, the closest available precedent, supplemented by additional measures identified in IDOT's own review of Illinois hot spots that fall reasonably within the scope of a NEPA-based environmental review. We recommend a monitoring period of not less than 10 years for all mitigation.

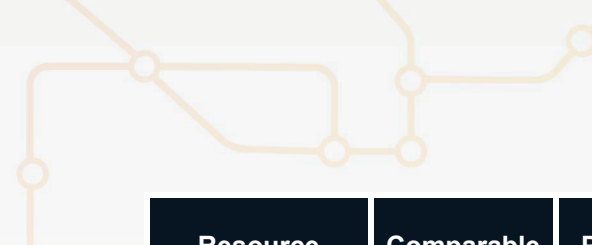
Mitigation measures:

- Fund or cost-share community-requested crossing safety and delay improvements at crossings the EIS identifies as experiencing a material increase in blockage time.
- Support new or preserved railroad Quiet Zone designations in communities where a traffic increase would result in a significant increase in noise impact and fund the crossing improvements needed to qualify.
- Improve sightlines and warning-device visibility (vegetation management, lighting) at crossings the EIS identifies as elevated-risk using an FRA grade-crossing accident-prediction analysis.
- Commit to a Safety Integration Plan, reviewed and endorsed by FRA, governing derailment and hazardous-materials release risk during the operational integration period (consistent with the CP-KCS commitments).

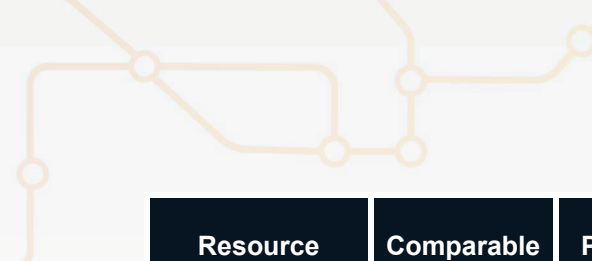
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- Conduct a wetland/Waters of the US delineation and floodplain/hydraulic capacity check at each proposed capital improvement site, and size any new or extended culverts to the results of that analysis.
 - At crossings where transaction-related operations are projected to result in blockages exceeding 10 minutes, implement measures to reduce blockage below that threshold or provide alternative vehicle access. Where other measures are not feasible, commit to grade separation.
 - Update and share hazardous-materials emergency response plans with local responders serving affected corridors and yards.
 - Report on implementation of the above commitments for a monitoring period of not less than 10 years following the transaction.

TABLE 3-1 POTENTIAL TRANSPORTATION AND COMMUNITY EFFECTS

Resource category	Comparable projects	Potential impacts of this merger	Potential mitigation	Data gaps / analysis needed
Transportation and at-grade crossing delay	CP-KCS Merger Final EIS; CSXT-Grand Trunk Western Operating Easement Draft EA	CP-KCS found only minor delay impacts system-wide: an average increase of less than a second per vehicle at the busiest crossings, with level-of-service staying stable almost everywhere. A similar order of magnitude is plausible here but must be confirmed against this merger's own segment-level traffic increment.	CP-KCS committed to help fund community-requested crossing safety/delay improvements and to consult with state DOTs on the design of any modified crossings and warning devices.	An AADT-based grade crossing delay analysis will be needed for each affected line segment and facility access road.
Emergency vehicle access and response time	CSXT-Grand Trunk Western Operating Easement Draft EA	CP-KCS's comparable analysis found emergency-route crossings would see about a one-second increase in average delay, which is minor.	Addressed under CP-KCS's grade-crossing mitigation commitments rather than as a separate emergency-response package.	A hospital/fire/EMS route inventory and blocked-crossing-time analysis will be needed for each affected line segment and facility.
Safety: grade crossing accidents	CP-KCS Merger Final EIS	CP-KCS projected roughly 6 additional train-vehicle crashes per year system-wide (about a 30% increase over baseline), concentrated at a handful of higher-traffic crossings, with most crossings seeing a negligible change.	CP-KCS committed to help fund community-requested crossing safety upgrades, clear vegetation to improve sightlines, and consult with state DOTs on warning-device design for modified crossings.	An FRA grade-crossing accident-prediction analysis, and a current inventory of at-grade vs. grade-separated crossings, will be needed for each affected segment.
Safety: derailments	CP-KCS Merger Final EIS	CP-KCS projected a modest system-wide increase in incidents, concentrated on its single highest-traffic-growth segment, with smaller increases elsewhere; part of any increase would be offset by reduced accidents on traffic diverted from truck and competing rail routes.	CP-KCS's Applicants committed to a Safety Integration Plan (SIP) reviewed and endorsed by FRA governing how the merged operations would be safely integrated.	An FRA derailment-history query and current track-class/PTC-status determination will be needed for each affected line segment and yard.

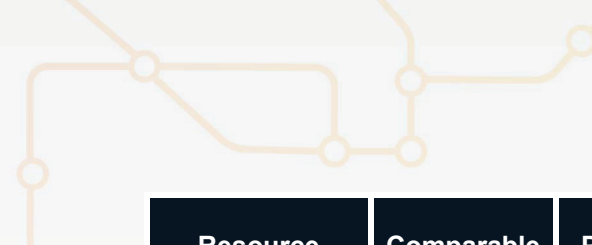


Resource category	Comparable projects	Potential impacts of this merger	Potential mitigation	Data gaps / analysis needed
Safety: hazardous materials transport	CP-KCS Merger Final EIS	CP-KCS projected a modest increase in hazmat releases system-wide, expected to be minor and short-duration, partly offset by reduced hazmat shipments on diverted truck and competing rail routes.	Covered under CP-KCS's SIP and voluntary operational commitments aimed at minimizing incident likelihood and impact.	Hazmat pre/post estimates should be calculated for each facility. An emergency-responder hazmat-capability assessment should also be completed for each facility/segment.
Air quality: criteria pollutants and ozone non-attainment	CP-KCS Merger Final EIS	CP-KCS found no net system-wide increase in air emissions (truck-to-rail diversion offset the added rail traffic), but localized NOx emissions exceeded EPA de minimis thresholds in several ozone nonattainment areas, including the Chicago area (relevant here).	CP-KCS's voluntary air quality and climate change mitigation measures were intended to minimize emissions. EPA and state agencies would account for the added NOx in future nonattainment-area emissions inventories.	Project-specific criteria-pollutant emissions modeling will be needed to understand how traffic increases result in changes in overall concentration or exceedance.
Air quality: diesel particulate matter and mobile source air toxics	CP-KCS Merger Final EIS	CP-KCS found all pollutants other than NOx, including hazardous air pollutants, remained well below de minimis thresholds system-wide.	See above.	A locomotive/truck emission-factor-based DPM and MSAT analysis will be needed for each affected segment and facility.
Greenhouse gases	CP-KCS Merger Final EIS	CP-KCS concluded the merger would not increase, and could decrease, overall GHG emissions due to an estimated 64,000 trucks per year diverted from highway to rail.	Covered under the same voluntary air quality and climate change mitigation commitments.	A GHG inventory and increment calculation would be needed for each affected line segment and facility.
Noise	CP-KCS Merger Final EIS; CSXT-Grand Trunk Western Operating Easement Draft EA	CP-KCS identified over 6,300 receptors system-wide with an adverse noise impact, concentrated in a handful of high-traffic-growth counties -- the single largest unavoidable adverse impact CP-KCS identified, and the category	CP-KCS committed to fund Quiet Zone improvements where its traffic increase would otherwise jeopardize an existing designation, to work with several Chicago-area communities on a new Quiet Zone, and to rail/railbed maintenance, FRA decibel-limit compliance, curve	A receptor-level noise study reflecting the merger's actual traffic increment will be needed for each affected line segment and facility.



Resource category	Comparable projects	Potential impacts of this merger	Potential mitigation	Data gaps / analysis needed
		where a comparable finding here is most likely.	lubrication, and responsive engagement on future Quiet Zone requests.	
Vibration	CP-KCS Merger Final EIS	CP-KCS identified roughly 1,400 receptors system-wide exceeding FTA vibration-annoyance thresholds, though it concluded structural damage from vibration remains unlikely; increased annoyance-level vibration (not damage) is the more plausible outcome here too.	No vibration-specific mitigation beyond CP-KCS's noise-related commitments.	A vibration re-screening reflecting the merger's actual traffic increment will be needed for each affected line segment.
Energy	CP-KCS Merger Final EIS	CP-KCS concluded the merger would not change the overall volume of energy commodities transported and would produce a net fuel-use reduction (~8 million gallons/year) from truck-to-rail diversion.	None identified beyond the operational efficiencies noted above.	An energy-consumption analysis (including locomotive fuel use, electricity used at facilities, and other sources) will be needed for each affected line segment and facility.
Environmental justice	75th Street Corridor Improvement Project FEIS/ROD; CP-KCS Merger Final EIS	CP-KCS found no significant disproportionate impacts on EJ populations in any category except noise, and concluded even that burden was not disproportionately borne by EJ populations -- a finding specific to CP-KCS's own traffic pattern that should not be assumed to carry over. By contrast, the 75th Street CIP found Chicago-area rail capacity increases CAN cause disproportionate EJ impacts, so a fresh screening addressing this merger's own increment is still warranted.	CP-KCS committed to proactive outreach to minority/low-income populations affected by noise about the Quiet Zone process, plus additional voluntary EJ-specific commitments.	An EJ analysis evaluating the merger's actual traffic increment will be needed for each affected line segment and facility with an EJ population in its vicinity.

Resource category	Comparable projects	Potential impacts of this merger	Potential mitigation	Data gaps / analysis needed
Socioeconomics and community cohesion	None identified	CP-KCS's FEIS did not include a standalone socioeconomic/community-cohesion chapter.	None identified.	A socioeconomic analysis reflecting the merger's specific traffic increment (not pre-existing baselines) would provide insight into potential impacts to nearby businesses and community facilities.
Cumulative effects	CP-KCS Merger Final EIS	CP-KCS found cumulative impacts from other reasonably foreseeable projects would be negligible for passenger rail safety, air quality, grade crossing safety, and delay, given the small scale of those other projects; it flagged two overlapping transmission-line projects with potential minor cumulative effects on biological and water resources. This merger is likely to be similar.	Addressed through the same resource-specific mitigation measures described above, applied cumulatively.	An actual cumulative-effects analysis combining this merger with other identified capital projects in the same corridors would be needed; no source document in this corpus performs one.
Water resources: surface water, wetlands, floodplains, stormwater	CP-KCS Merger Final EIS	This merger's own Capital Improvement Plan includes five Illinois construction sites, each of which accommodate 1–2 miles of new track within or adjacent to the existing corridor.	CP-KCS's voluntary and OEA-recommended mitigation measures were intended to avoid or minimize wetland/surface-water impacts at each affected construction site.	A wetland/WOUS delineation and floodplain check at the five confirmed sites.
Biological resources and state-listed species	CP-KCS Merger Final EIS	Habitat disturbance at the five confirmed construction sites make disturbance to biological resources possible.	CP-KCS committed to seasonal work restrictions (avoiding tree/culvert/bridge removal during bat season) at sites with suitable bat habitat.	A listed-species habitat screening at the five confirmed sites.
Contaminated sites and hazardous materials in the right-of-way	CP-KCS Merger Final EIS	The five confirmed sites could encounter legacy contamination.	CP-KCS's voluntary and OEA-recommended mitigation measures were designed to avoid or minimize impacts to hazardous-materials release sites at affected construction locations.	A Phase I Environmental Site Assessment would be needed at the five confirmed sites.



Resource category	Comparable projects	Potential impacts of this merger	Potential mitigation	Data gaps / analysis needed
Cultural and historic resources (Section 106)	CP-KCS Merger Final EIS	The five sites identified for capital construction may include cultural and historic resources that could be damaged in construction.	CP-KCS committed to an archaeological monitoring plan during construction, personnel training on historic-property identification, and confining construction footprints to avoid known archaeological sites.	A Section 106 should be conducted on the applicants' capital improvement projects (already confirmed by OEA). Recommend also checking against nearby Section 4(f)/6(f) and sensitive viewshed in this effort as well.
Temporary construction effects	None identified	Construction proposed includes 1-2 miles of new track, siding extension, signal/crossover work. This is primarily short-duration and generally contained to the ROW. Based on this understanding, impacts are likely to be minimal.	See per-resource mitigation in other sections.	Construction-phase effects inventory (including noise, traffic detours, duration, and other impacts) at the five confirmed sites.
Truck to rail diversion	CP-KCS Merger Final EIS	CP-KCS concluded truck-to-rail diversion would not create any adverse impacts on roadways or traffic, and could result in fewer highway trucks.	None identified.	A truck-to-rail diversion (mode-shift) analysis would be needed to quantify any offsetting reduction in highway truck traffic from the merger's rail-traffic increase; not yet assessed for this merger.
Traffic at intermodal facilities	CP-KCS Merger Final EIS	CP-KCS concluded increased intermodal-facility truck traffic would not create adverse impacts, based on the existing capacity of local access roads.	None identified.	A facility-level intermodal traffic-impact analysis (gate volumes, local roadway/queuing effects) would be needed for each affected intermodal facility; not yet assessed for this merger.

Source: Cambridge Systematics analysis based on the CP-KCS Merger Final EIS; CSXT–Grand Trunk Western Operating Easement Draft EA; 75th Street Corridor Improvement Project environmental review; STB environmental regulations at 49 CFR 1105.7(e); Applicants' operating and capital-improvement information; and IDOT review.

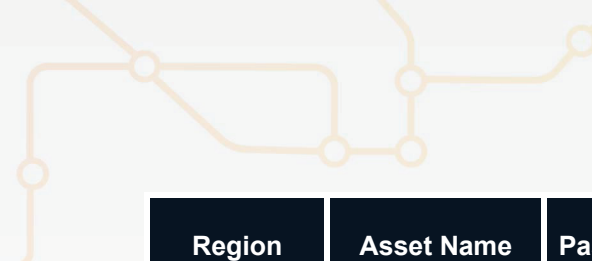


4.0 PASSENGER RAIL EFFECTS

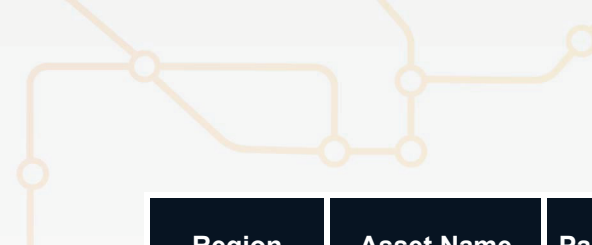
Passenger rail effects are likely to be extensive. One of every four U.S. freight trains passes through Chicago with 500 freight trains and 800 passenger and commuter trains every day. Illinois freight trains interact with Metra and Amtrak on a daily basis with shared track requiring coordination for operations. The applicants' Master Segment Tables, files as an errata on July 27, 2026, identify pre-transaction and post-transaction gross ton miles (GTM) and trains per day (TPD) for every line segment. Because the applicants do not identify which of their segments carry Amtrak or Metra trains, this research draws from the Chicago to Detroit Tier 1 EIS along with current Amtrak and Metra route maps. IDOT recommends that segments included in the Master Segment Tables where passenger rail effects are likely be considered in the analysis of the proposed merger (Table 4-1). Segments that were previously identified by the applicants are indicated with an asterisk. Additional locations have been identified on the basis. Many of these (29) are located in Northeast Illinois, and these also have the largest forecast changes in freight activity. Southern Illinois, primarily from the St. Louis Metro East cluster, accounts for 12 segments. These locations are proximate to proposed changes in freight activity. Central Illinois accounts for 5 segments. One segment runs from both Northeast and Central Illinois, since it runs from Joliet to Bloomington.

TABLE 4-1 ILLINOIS PASSENGER RAIL SEGMENTS AND FREIGHT INTERFACES

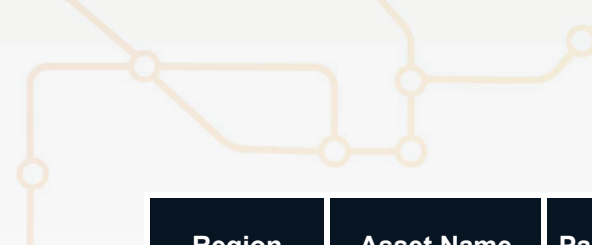
Region	Asset Name	Passenger Rail Overlap	Passenger Service(s) Potentially Affected	Basis
Central Illinois	10252-SPRINGFIELD SUB	Confirmed	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment is Union Pacific Springfield Subdivision. Amtrak Lincoln Service and Texas Eagle use the line. Forecast change here is very small but not zero.
Central Illinois	10253-SPRINGFIELD SUB	Confirmed	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment is Union Pacific Springfield Subdivision, includes Iles. Amtrak Lincoln Service and Texas Eagle use the line. Forecast change here is very small but not zero.
Central Illinois	10254-SPRINGFIELD SUB	Confirmed	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment is Union Pacific Springfield Subdivision, includes Hazel Dell. Amtrak Lincoln Service and Texas Eagle use the line. Forecast change here is very small but not zero.
Central Illinois	10255-SPRINGFIELD SUB	Confirmed	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment is Union Pacific Springfield Subdivision. Amtrak Lincoln Service and Texas Eagle use the line. Forecast change here is very small but not zero.
Central Illinois	10256-SPRINGFIELD SUB	Confirmed	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment is Union Pacific Springfield Subdivision, near Wood River and Godfrey. Amtrak Lincoln Service and Texas Eagle use the line. Forecast change here is very small but not zero.
Northeast Illinois	10058-CHICAGO LINE*	Confirmed	Amtrak Wolverine, Amtrak Blue Water, Amtrak Pere Marquette, Amtrak Capitol Limited, Amtrak Lake Shore Limited, Amtrak Cardinal, Metra Electric SouthWest Service	Segment part of NS Chicago Line. 14 daily Amtrak trains use the line. Metra SouthWest Service also uses the line. Tier 1 EIS called this the most delay-prone passenger corridor in the country. Merger adds freight traffic here.
Northeast Illinois	10235-GENEVA SUB*	Confirmed	Metra UP-West Line	Segment carries Metra UP-West Line. Union Pacific owns and dispatches the line. Merger adds a large amount of freight traffic here.
Northeast Illinois	10236-GENEVA SUB*	Confirmed	Metra UP-West Line	Segment carries Metra UP-West Line. Union Pacific owns and dispatches the line. Merger adds freight traffic here.
Northeast Illinois	10237-GENEVA SUB*	Confirmed	Metra UP-West Line	Segment carries Metra UP-West Line. Union Pacific owns and dispatches the line. Merger adds freight traffic here.
Northeast Illinois	10238-GENEVA SUB*	Confirmed	Metra UP-West Line	Segment carries Metra UP-West Line. Union Pacific owns and dispatches the line. Merger adds freight traffic here.



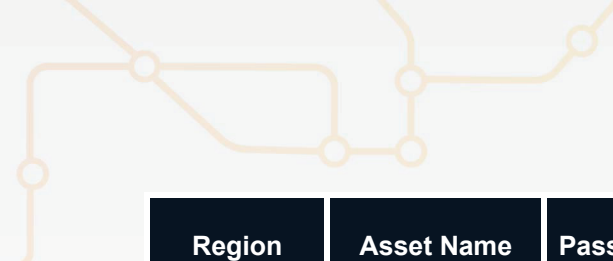
Region	Asset Name	Passenger Rail Overlap	Passenger Service(s) Potentially Affected	Basis
Northeast Illinois	10239-GENEVA SUB	Confirmed	Metra UP-West Line	Segment carries Metra UP-West Line. Union Pacific owns and dispatches the line. Merger adds freight traffic here.
Northeast Illinois	10240-GENEVA SUB	Confirmed	Metra UP-West Line	Segment carries Metra UP-West Line. Union Pacific owns and dispatches the line. Merger adds freight traffic here.
Northeast Illinois	10320-HARVARD SUB	Confirmed	Metra UP-Northwest Line	Segment carries Metra UP-Northwest Line. Union Pacific owns and dispatches the line. Merger adds a small amount of freight traffic here.
Northeast Illinois	10321-HARVARD SUB	Confirmed	Metra UP-Northwest Line	Segment carries Metra UP-Northwest Line. Union Pacific owns and dispatches the line. Merger adds a small amount of freight traffic here.
Northeast Illinois	10322-HARVARD SUB	Confirmed	Metra UP-Northwest Line	Segment carries Metra UP-Northwest Line. Union Pacific owns and dispatches the line. Merger adds a small amount of freight traffic here.
Northeast Illinois	10323-HARVARD SUB	Confirmed	Metra UP-Northwest Line	Segment carries Metra UP-Northwest Line. Union Pacific owns and dispatches the line. Merger adds a small amount of freight traffic here.
Northeast Illinois	10324-HARVARD SUB	Confirmed	Metra UP-Northwest Line	Segment carries Metra UP-Northwest Line. Union Pacific owns and dispatches the line. Absolute change rounds to zero. Percent change is not zero.
Northeast Illinois	10909-OTHER MANHATTAN IL NS -CHICAGO RIDGE IL _ _ _ _	Confirmed	Metra Southwest Service	Segment connects to Chicago Ridge. Metra Southwest Service passes through Chicago Ridge. Merger adds a small amount of freight traffic here.
Northeast Illinois	11985-OTHER KEDZIE-OGDEN JCT*	Likely (proximity)	Metra UP-West Line	Segment near Kedzie Junction. Metra UP-West Line passes through Kedzie Junction. Proximity based judgment, not confirmed shared track. Merger adds a large amount of freight traffic here.
Northeast Illinois	12224-OTHER WASHINGTON ST-WEST EOLA*	Likely (proximity)	Amtrak trains, Metra BNSF Line	Segment near Eola, close to Aurora. BNSF Chicago to Aurora line runs nearby. That line carries Amtrak trains and Metra BNSF Line. Proximity based judgment. Merger adds freight traffic here.
Northeast Illinois	12307-OTHER CD518 NS - CD517 NS _ _ *	Confirmed	Metra Electric SouthWest Service, Amtrak Cardinal	Segment connects two control points on NS Chicago Line near 47th Street. Metra SouthWest Service and Amtrak Cardinal use the line. Merger adds freight traffic here.



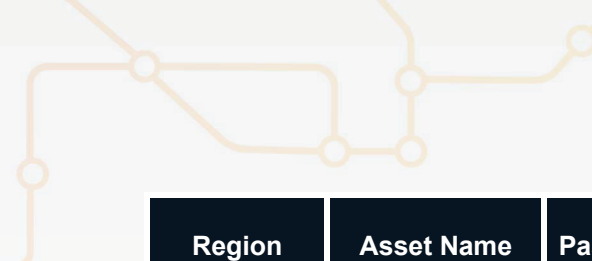
Region	Asset Name	Passenger Rail Overlap	Passenger Service(s) Potentially Affected	Basis
Northeast Illinois	12312-OTHER CHICAGO ASHLAND - CHICAGO ASHLAND*	Confirmed	Metra Electric SouthWest Service, Amtrak Cardinal	Segment near Ashland Avenue, next to NS 47th Street control point on the Chicago Line. Metra SouthWest Service and Amtrak Cardinal use the line. Merger adds freight traffic here.
Northeast Illinois	12314-OTHER OGDEN JCT-CHICAGO IMX*	Likely (proximity)	Metra UP-West Line	Segment near Kedzie Junction and Ogden Junction. Metra UP-West Line passes through Kedzie Junction. Proximity based judgment, not confirmed shared track. Merger adds a large amount of freight traffic here.
Northeast Illinois	12367-OTHER DOLTON JCT-CHICAGO 59TH ST	Confirmed	Amtrak Cardinal, Metra Southwest Service	Segment connects to Dolton Junction. Amtrak Cardinal passes through Dolton Junction. Metra Southwest Service also uses this area. Merger adds freight traffic here.
Northeast Illinois	12371-OTHER BN035 UP - ZS036 UP __ *	Confirmed	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment ends at Joliet. Amtrak Lincoln Service and Texas Eagle transition onto Union Pacific track at Joliet. Merger adds freight traffic here.
Northeast Illinois	12702-OTHER AT003 UP - AT009 UP __ *	Likely (proximity)	Amtrak and Metra trains approaching Chicago Union Station	Segment passes through Brighton Park. Brighton Park is a major rail junction on Chicago's south side. CREATE program Englewood Flyover project addresses freight and passenger conflicts near this junction. Proximity based judgment. Merger adds a large amount of freight traffic here.
Northeast Illinois	12754-OTHER UW2 NS - CD518 NS __ *	Confirmed	Metra Electric SouthWest Service, Amtrak Cardinal	Segment connects to a control point on NS Chicago Line near 47th Street. Metra SouthWest Service and Amtrak Cardinal use the line. Merger adds freight traffic here.
Northeast Illinois	12755-OTHER CD517 NS - 066262 NS __ *	Confirmed	Metra Electric SouthWest Service, Amtrak Cardinal	Segment begins at NS 47th Street control point on the Chicago Line. Metra SouthWest Service and Amtrak Cardinal use the line. Merger adds freight traffic here.
Northeast Illinois	13025-OTHER DOLTON JCT IL UP-BARR YARD IL UP __	Confirmed	Amtrak Cardinal, Metra Southwest Service	Segment connects to Dolton Junction. Amtrak Cardinal passes through Dolton Junction. Metra Southwest Service also uses this area. Merger adds a small amount of freight traffic here.
Northeast Illinois	122909-OTHER ASHBURN IL NS-CHICAGO RIDGE IL _	Confirmed	Metra Southwest Service	Segment connects to Chicago Ridge. Metra Southwest Service passes through Chicago Ridge. Merger adds a small amount of freight traffic here.



Region	Asset Name	Passenger Rail Overlap	Passenger Service(s) Potentially Affected	Basis
Northeast Illinois	123635-OTHER CALUMET IL UP-DOLTON JCT IL UP __	Confirmed	Amtrak Cardinal, Metra Southwest Service	Segment connects to Dolton Junction. Amtrak Cardinal passes through Dolton Junction. Metra Southwest Service also uses this area. Merger adds freight traffic here.
Northeast Illinois	123638-OTHER THORNTON JCT IL -DOLTON JCT IL UP __	Confirmed	Amtrak Cardinal, Metra Southwest Service	Segment connects to Dolton Junction. Amtrak Cardinal passes through Dolton Junction. Metra Southwest Service also uses this area. Merger adds freight traffic here.
Northeast Illinois	10059-CHICAGO LINE*	Confirmed	Amtrak Wolverine, Amtrak Blue Water, Amtrak Pere Marquette, Amtrak Capitol Limited, Amtrak Lake Shore Limited, Amtrak Cardinal, Metra Electric SouthWest Service	Segment part of NS Chicago Line. Runs from Chicago to Porter, Indiana. 14 daily Amtrak trains use the line. Metra SouthWest Service also uses the line. Merger adds freight traffic here.
Northeast Illinois	CHICAGO (47TH STREET)*	Confirmed	Metra Electric SouthWest Service, Amtrak Cardinal	Facility shares name and location with NS 47th Street control point on the Chicago Line. Metra SouthWest Service and Amtrak Cardinal use the line. Forecast change here is trucks per day, not trains. Reflects added activity at this location.
Northeast Illinois / Central Illinois (multi-region: Joliet to Bloomington)	10251-JOLIET SUB	Confirmed	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment is Union Pacific Joliet Subdivision. Amtrak Lincoln Service and Texas Eagle use the line south of Joliet. Merger adds a small amount of freight traffic here.
Southern Illinois	11379-OTHER VENICE IL UP-Q TOWER IL UP _	Likely (proximity)	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment in the St. Louis area rail network. Amtrak Lincoln Service and Texas Eagle cross the Mississippi River nearby on the MacArthur Bridge. Proximity based judgment. Forecast change here is very small but not zero.
Southern Illinois	11666-OTHER DUPO-VALLEY JCT	Likely (proximity)	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment in the St. Louis area rail network. Amtrak Lincoln Service and Texas Eagle cross the Mississippi River nearby on the MacArthur Bridge. Proximity based judgment. Merger adds a small amount of freight traffic here.
Southern Illinois	12018-OTHER CENTREVILLE-VALLEY JCT	Likely (proximity)	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment in the St. Louis area rail network. Amtrak Lincoln Service and Texas Eagle cross the Mississippi River nearby on the MacArthur Bridge. Proximity based judgment. Merger adds freight traffic here.



Region	Asset Name	Passenger Rail Overlap	Passenger Service(s) Potentially Affected	Basis
Southern Illinois	12404-OTHER SH TOWER IL UP-CP JUNCTION IL U --	Likely (proximity)	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment in the St. Louis area rail network. Amtrak Lincoln Service and Texas Eagle cross the Mississippi River nearby on the MacArthur Bridge. Proximity based judgment. Merger adds freight traffic here.
Southern Illinois	12408-OTHER CP JUNCTION-WILLOWS	Likely (proximity)	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment in the St. Louis area rail network. Amtrak Lincoln Service and Texas Eagle cross the Mississippi River nearby on the MacArthur Bridge. Proximity based judgment. Merger adds freight traffic here.
Southern Illinois	12421-OTHER A&S JCT IL NS 7W-VALLEY JCT --*--	Likely (proximity)	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment in the St. Louis area rail network. Amtrak Lincoln Service and Texas Eagle cross the Mississippi River nearby on the MacArthur Bridge. Proximity based judgment. Merger adds freight traffic here.
Southern Illinois	12424-OTHER VALLEY JCT-NORTH VALLEY JCT*	Likely (proximity)	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment in the St. Louis area rail network. Amtrak Lincoln Service and Texas Eagle cross the Mississippi River nearby on the MacArthur Bridge. Proximity based judgment. Merger adds freight traffic here.
Southern Illinois	12470-OTHER Q TOWER IL UP-MACARTHUR BRIDGE _	Confirmed	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment ends at the MacArthur Bridge. Amtrak Lincoln Service and Texas Eagle cross the Mississippi River on this bridge to reach St. Louis. Forecast change here is very small but not zero.
Southern Illinois	12531-OTHER MACARTHUR BRIDGE-NORTH VALLEY JCT	Confirmed	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment begins at the MacArthur Bridge. Amtrak Lincoln Service and Texas Eagle cross the Mississippi River on this bridge to reach St. Louis. Merger adds freight traffic here.
Southern Illinois	12532-OTHER NORTH VALLEY JCT-WILLOWS	Likely (proximity)	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment in the St. Louis area rail network. Amtrak Lincoln Service and Texas Eagle cross the Mississippi River nearby on the MacArthur Bridge. Proximity based judgment. Merger adds freight traffic here.
Southern Illinois	13022-OTHER WR INTERLOCKING-WR TOWER	Likely (proximity)	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment in the St. Louis area rail network. Amtrak Lincoln Service and Texas Eagle cross the Mississippi River nearby on the MacArthur Bridge. Proximity based judgment. Absolute change rounds to zero. Percent change is not zero.



Region	Asset Name	Passenger Rail Overlap	Passenger Service(s) Potentially Affected	Basis
Southern Illinois	13029-OTHER VENICE IL UP-WR TOWER IL UP __	Likely (proximity)	Amtrak Lincoln Service, Amtrak Texas Eagle	Segment in the St. Louis area rail network. Amtrak Lincoln Service and Texas Eagle cross the Mississippi River nearby on the MacArthur Bridge. Proximity based judgment. Forecast change here is very small but not zero.

Source: Cambridge Systematics analysis based on Applicants' operating and routing information; IDOT passenger-rail information; Amtrak and Metra route information; and Quandel Consultants' technical analysis of the proposed merger.

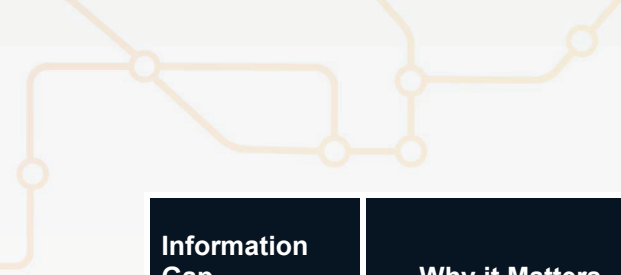
5.0 DATA, ASSUMPTIONS, AND INFORMATION GAPS

The analyses identified in Sections 2 through 4 depend on a clear and internally consistent description of how the proposed transaction would change rail operations in Illinois. As discussed in Section 2.7, the segment-level operating data, subsequent routing descriptions, and announced operating plans do not appear to provide a complete or fully consistent picture of post-transaction freight movements at several important Illinois locations. IDOT recommends that OEA obtain and reconcile the information needed to establish a consistent with-transaction operating scenario for Illinois.

In addition to potential effects on existing passenger rail operations, the environmental review should consider planned and future passenger rail investments. IDOT is planning significant future expansions to its intercity passenger rail network, and the proposed merger could affect the ability to implement these future services. The [Midwest Regional Rail Plan](#) and the [Illinois Passenger Rail: Chicago to Rockford](#) website provide additional details of the planned service expansions and corridor improvements throughout the region that should be considered when evaluating potential merger impacts. The [IDOT Rail Plan](#) is currently being updated and is expected to be available in 2027. The 2023 Rail Plan highlights substantial passenger rail needs in the state. In addition, IDOT is the sponsor for multiple Corridor ID projects with the Federal Railroad Administration and is partnering with the City of Peoria, Amtrak and other State sponsors on multiple multi-state routes. Additional expansion and improvement plans for Amtrak that can be found in their [Amtrak Connects US Vision Plan](#) and for Metra in their [Strategic Plan](#). Because passenger rail service operates on and interacts with the freight rail network, any merger-related changes to freight rail operations have the potential to affect passenger rail reliability, capacity, and future expansion opportunities. Ensuring the efficient movement of both freight and passengers is essential to supporting Illinois' continued population and economic growth and maintaining the state's competitiveness within the Midwest and the national economy.

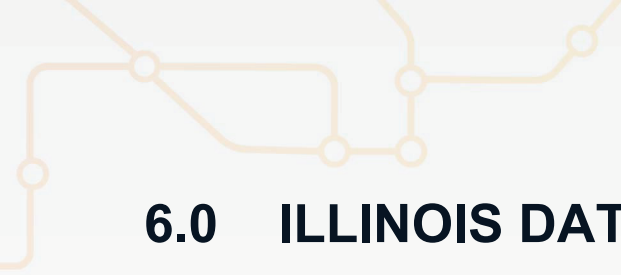
TABLE 5-1 INFORMATION GAPS REQUIRING RESOLUTION FOR THE ILLINOIS ANALYSIS

Information Gap	Why it Matters	Key Illinois Locations / Interfaces	Clarification Needed
Freight routing and network assignment	The EIS cannot define the correct study geography unless the expected routing of transaction-related trains is clear and internally consistent.	Geneva Subdivision; West Chicago/JB Tower; CN former EJ&E/Wisconsin Central; East Joliet; Joliet–Elwood/Global IV; Springfield; Kansas City and St. Louis gateway routes; Metro East.	Reconcile the Applicants' segment-level data, operating descriptions, and subsequent routing information to identify where transaction-related trains would actually operate in Illinois.
Train volumes, lengths, timing, and operating characteristics	Crossing delay, noise, vibration, air quality, safety, and passenger interfaces depend not only on daily train counts but also on train length, timing, speed, and operating patterns.	All affected corridors and major junctions identified in Section 2.	Provide with- and without-transaction assumptions for daily train volumes, train type, train length, time-of-day distribution, direction of travel, speed, dwell, and GTM. Identify whether existing siding, second-main, and other holding capacity is sufficient for the train lengths and operating patterns assumed under the with-transaction scenario.



Information Gap	Why it Matters	Key Illinois Locations / Interfaces	Clarification Needed
Yard, terminal, interchange, and switching activity	Facility-level effects may not be apparent from line-segment train counts alone.	Decatur; Bloomington Yard; East Joliet Yard; Global IV; Dupo/Alton & Southern Yard; other Chicago terminal yards and interchange points.	Identify changes in yard arrivals/departures, classification, switching, idling, crew activity, block swaps, interchange, and mainline occupancy.
Highway-rail crossing conditions	Crossing-related effects depend on roadway use, blockage conditions, access alternatives, and local context.	Decatur; Morrison; high-volume crossings along affected corridors; communities without grade-separated alternatives.	Provide or estimate roadway volumes, train blockage frequency and duration, gate-down time, alternative routes, emergency routes, school/transit access, and crash history. Identify relevant programmed crossing improvements, including projects in the ICC 2026–2031 Capital Railroad Crossing Program, and determine whether they overlap with transaction-related needs or improvements.
Passenger rail and capacity assumptions	Several affected freight corridors also carry Metra, Amtrak, or planned passenger services.	Metra UP West; Chicago terminal; Joliet–Elwood; Springfield; Bloomington; Wood River/East St. Louis; Tolono; Tuscola; Effingham; Centralia; DeKalb–Elburn.	Clarify the assumptions used regarding shared-track and junction capacity, dispatching, routing, and any infrastructure improvements relied on to support future operations.
Intermodal and automotive facility traffic	Truck activity at affected rail facilities may create localized roadway, safety, air-quality, and community effects.	Global 2; 47th Street; Hegewisch; Centreville; Global IV and other relevant facilities.	Confirm projected truck trips, time-of-day distribution, truck routes, gate operations, nearby roadway conditions, and interactions with rail crossings and sensitive receptors.
Capital improvement footprints and construction assumptions	Construction effects and site-specific environmental impacts cannot be assessed without a defined footprint and work plan.	Griggsville; Decatur; CP Brush; Vance; Eldon–Ross Lane; Tilton.	Define project footprints, temporary work areas, access routes, staging, duration, drainage and grading needs, utility impacts, temporary crossing or roadway effects, and expected post-construction operations.
Hazardous materials and safety data	Safety and emergency-response effects may differ if routing or train activity changes alter hazardous-material exposure.	Affected corridors, junctions, yards, and terminal locations where routing or train activity changes materially.	Identify existing and projected hazardous-material movements, affected routes and facilities, relevant incident history, emergency-response capabilities, and any transaction-specific safety assumptions.

Source: Cambridge Systematics analysis based on Applicants' July 27, 2026 Updated Master Segment Tables; UP-NS operating and routing information; OEA Preliminary Consultation materials; IDOT review; and Quandel Consultants' technical analysis of the proposed merger.



6.0 ILLINOIS DATA AND STUDIES OEA SHOULD USE

The information gaps identified in Section 5 can be addressed using a combination of materials in the merger docket, federal railroad datasets, project-area environmental and planning studies, comparable rail environmental reviews, and Illinois-specific transportation and environmental information. IDOT recommends that OEA use these sources, as applicable, to establish baseline conditions, reconcile operating assumptions, validate the Applicants' projections, and support the location-specific analyses identified in Sections 2 through 4.

The recommended data and studies fall primarily into six general categories:

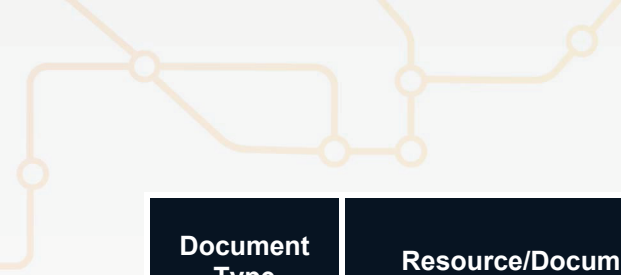
- Merger case file and Applicant materials, including the operating plan, Service Assurance Plan, Safety Integration Plan, OEA information requests and Applicant responses, segment and facility data, and relevant Board decisions.
- Project-area environmental, transportation, and planning studies, including prior NEPA reviews and planning documents addressing rail capacity, passenger rail, grade separations, highway projects, and other transportation investments in affected corridors.
- Comparable rail environmental reviews and effects studies, including prior Class I mergers, rerouting and operating-easement proceedings, rail traffic-increase reviews, and railyard air-quality studies.
- Illinois environmental and resource databases, including biological, cultural, water, contamination, and remediation information maintained by State agencies.
- Illinois and regional transportation data and plans, including IDOT, ICC, CMAP, freight-planning, infrastructure-condition, and rail-crossing information.
- Protected recreational and natural resources, including trails, parks, natural areas, and other resources potentially subject to Section 4(f), Section 6(f), or related protections.

Table 6-1 identifies the principal data sources, studies, and supporting documents that can inform OEA's Illinois environmental review.

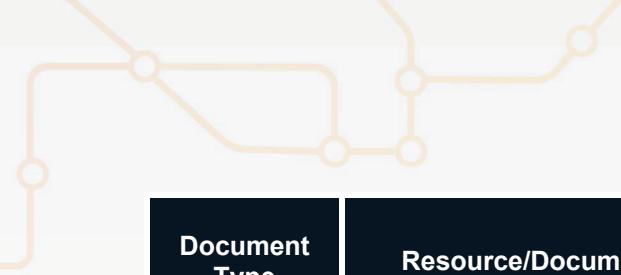
TABLE 6-1 RECOMMENDED DATA AND STUDIES

Document Type	Resource/Document Name	Description
Merger case file	Applicants' Environmental Report	Applicants were formally excused from preparing this document because the Board hired its own outside consultant to write the environmental review directly.
Merger case file	Agency Preliminary Consultation Letter	OEA's letter to state and federal agencies asking for their input, and setting the comment deadline.
Merger case file	Tribal Preliminary Consultation Letter	Companion letter to the agency consultation letter, sent to Tribal governments.
Merger case file	Elected Officials Preliminary Consultation Letter	Companion letter to the agency consultation letter, sent to elected officials.
Merger case file	Preliminary Consultation Distribution List	List of exactly who received the preliminary consultation letters.
Merger case file	Decision No. 21	Board ruling accepting the applicants' revised application and requesting additional information.
Merger case file	Decision No. 30	Board ruling that set the case's procedural schedule and confirmed which traffic dataset environmental review is based on.
Merger case file	OEA Information Requests No. 1-4	OEA's written requests to the applicants specifying exactly what data to provide, and in what form.
Merger case file	Applicant responses: A3 Manifest Yards, A4 Intermodal and Auto, G1 Roadway and At-Grade Crossings, G2 Quiet Zones, Capital Improvements	Applicants' facility-level data submission, including figures for Global 2, Global 3, 47th Street, and Chicago Mixing Center. Overlaps with the master segment tables already in hand.
Merger case file	Safety Integration Plan	Applicants' plan, developed with FRA, for managing safety as the two railroads' operations combine.
Merger case file	Exhibit 13 operating plan	Applicants' filed operating plan, including a required list of yards where activity is projected to increase significantly.
Merger case file	Service Assurance Plan	Applicants' commitment document setting numeric service targets at specific facilities, before and after the merger. Other parties have publicly questioned whether it's complete.
Merger case file	Unfiltered workpapers	Applicants' underlying calculation workpapers behind the published segment tables.
Merger case file	UP-NS Updated Master Segment Tables for Errata Filing	The dataset (line segments, yards, intermodal/auto facilities) that the Illinois screening and effects analysis is built on.
Merger case file	UP-NS Errata Filing Cover Letter	Explains what changed between the two published versions of the segment tables.
Merger case file	UP-NS Master Segment Tables, earlier version	Earlier version of the segment tables, used to identify what changed in the later errata filing.
Merger case file	UP-NS Revised Major Merger Application (Volume 1)	The applicants' full revised application narrative; source of the finding that no separate environmental report was required.
NEPA - project area	CREATE B2 Phase I environmental package	Underlying environmental studies for the Proviso Yard third-track project.

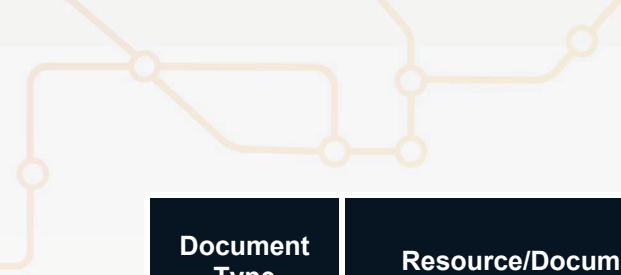
Document Type	Resource/Document Name	Description
NEPA - project area	CREATE GS6 Phase I environmental package	Underlying environmental studies for the 25th Avenue (Bellwood) grade separation.
NEPA - project area	CREATE GS15a Phase I environmental package	Underlying environmental studies (wetlands, drainage, site assessment) for the Hegewisch grade-separation project.
NEPA - project area	CREATE WA1 Phase I environmental package	Underlying environmental studies for the Ogden Junction/Kedzie corridor project.
NEPA - project area	Metra UP-W Elburn Extension environmental document	Environmental review covering the West Chicago-Geneva-Elburn corridor extension, a large completed Metra project.
NEPA - project area	CREATE P1, Englewood Flyover	Environmental review for a completed flyover project on the NS Chicago Line between 47th Street and CP 502.
NEPA - project area	Indiana Gateway subprojects other than #7	Environmental reviews for the other seven Indiana Gateway subprojects along the NS Chicago Line.
NEPA - project area	Indiana Gateway Project #7 (Pine Yard): Modifications EA and FONSI	Environmental review for track/access changes at Pine Yard, on the NS Chicago Line just east of Porter, Indiana.
NEPA - project area	Indiana Gateway Project #7: signed FONSI	Signed federal decision closing out the Pine Yard environmental review.
NEPA - project area	NICTD Double Track (Gary to Michigan City, IN)	Environmental review for a commuter-rail double-tracking project parallel to the NS Chicago Line.
NEPA - project area	NICTD West Lake Corridor FEIS/ROD	Full environmental review for a nearby Indiana commuter-rail corridor.
NEPA - project area	I-290 Eisenhower Expressway EIS	Highway environmental review parallel to the Proviso rail corridor.
NEPA - project area	Elgin O'Hare-West Bypass	Highway environmental review near Bensenville and Franklin Park.
NEPA - project area	CREATE Final Feasibility Plan	Program-level planning document that established baseline train counts for the CREATE program.
NEPA - project area	Chicago-Detroit/Pontiac Tier 1 environmental review (purpose, alternatives, procedural chapters)	Federal passenger-rail corridor study confirming the 47th Street-CP502-Porter corridor is one of the most congested in the country.
NEPA - project area	Chicago-Detroit/Pontiac Tier 1 environmental review, resource findings chapter	The chapter containing actual impact findings for the Illinois portion of the corridor.
NEPA - project area	FRA notice cancelling the Chicago-Detroit/Pontiac review	Federal notice confirming this passenger-rail study was discontinued without a final report.
NEPA - project area	75th Street Corridor Improvement Project environmental review	Full environmental review for a comparable Chicago-area rail capacity project; found disproportionate impacts on minority/low-income communities from noise, vibration, and visual effects.
NEPA - project area	75th Street Corridor Improvement Project re-evaluations	Later updates re-validating the review above.
NEPA - project area	DeKalb-Elburn Planning and Environmental Linkages Study	Early-stage planning study for a possible commuter-rail extension. Not yet published.



Document Type	Resource/Document Name	Description
NEPA - project area	Grand Crossing Rail Project overview	Confirms this proposed Amtrak-routing project's environmental review was never completed.
CERCLA - project area	West Chicago Superfund cleanup decisions	Federal records documenting a contaminated area the rail corridor passes through in West Chicago; the creek segment was reportedly just cleared for delisting.
Local plan	City of Chicago Hegewisch Marsh site plan	Local plan identifying a railroad-owned parcel within the Hegewisch Marsh restoration site.
Comparable effects	Conrail / CSX / NS, STB Finance Docket No. 33388	Environmental review of an earlier large Class I rail combination, including Chicago-area lines; resulted in significant mitigation conditions.
Comparable effects	UP/SP, STB Finance Docket No. 32760	Prior Union Pacific transcontinental merger, with mitigation conditions and ongoing oversight, though no full impact statement was required at the time.
Comparable effects	CP/DM&E, related STB docket	Environmental review of an earlier rail acquisition affecting existing rural lines. The specific docket number on file could not be verified and needs correcting.
Comparable effects	Oversight reports on prior mergers	Follow-up reports comparing what was predicted in prior merger reviews against what actually happened; confirmed to be a real, ongoing reporting requirement in at least one comparable case.
Comparable effects	CARB Roseville Rail Yard Study and related California yard studies	Quantified air-quality and cancer-risk study for a major rail yard; best available comparable for facility-level air quality, which nothing else in the current research addresses.
Comparable effects	CN/EJ&E Scope of Study	Document showing what OEA committed to analyze in an earlier comparable case; useful as a methodology template.
Comparable effects	CP/KCS Scope of Study	Same value as above, for the CP-KCS merger case.
Comparable effects	CN/EJ&E environmental review and Board decision	Full environmental review and final decision for an earlier, geographically related rail transaction; not yet located.
Comparable effects	CP-KCS Merger Final Environmental Impact Statement	Full environmental review for a comparable recent STB rail merger; the closest available precedent for grade-crossing delay, safety, and noise findings.
Comparable effects	CP-KCS Draft Environmental Impact Statement	Earlier draft of the review above; superseded by the final version.
Comparable effects	CSXT-Grand Trunk Western Operating Easement, Draft Environmental Assessment	Environmental review of rerouting existing trains onto existing Chicago-area track; found adverse emergency-response and noise impacts from a comparable traffic increase.
Comparable effects	CSXT-Grand Trunk Western, Final Environmental Assessment	Final version of the review above; not yet located.
Illinois - biological / natural areas	IDNR EcoCAT	State online tool for checking a site against endangered species and natural areas records; same-day results.
Illinois - biological / natural areas	Illinois Natural Areas Inventory	State database of high-quality natural areas and protected species habitat.



Document Type	Resource/Document Name	Description
Illinois - biological / natural areas	Illinois Natural Heritage Database	State database of state-listed threatened and endangered species locations.
Illinois - biological / natural areas	Illinois Nature Preserves Commission registry	State list of dedicated nature preserves and protected land and water areas.
Illinois - biological / natural areas	Illinois Wetland Inventory	State wetland mapping, similar to the federal wetlands inventory.
Illinois - cultural	Illinois SHPO historic resources database	State database of historic buildings and structures; known to lag behind on recent surveys and listings.
Illinois - cultural	National Register and state historic structures listings	Lists of formally recognized historic properties.
Illinois - cultural	Illinois State Archaeological Survey site files	State archaeological site records; access is restricted and requires a formal request.
Illinois - contamination	Office of the State Fire Marshal underground storage tank registry	State registry of underground fuel storage tanks.
Illinois - contamination	IEPA leaking underground storage tank database	State records of contamination incidents and cleanups from leaking fuel tanks.
Illinois - contamination	IEPA site remediation and brownfields databases	State records of known contaminated sites and cleanup status.
Illinois - contamination	IEPA federal Superfund site list	State-maintained list of federally designated contaminated sites.
Illinois - contamination	IDOT environmental site assessment reports	Existing contamination assessments already completed for nearby rail projects; the fastest available source on this topic.
Illinois - water	IEPA impaired waters and water quality certification records	State records identifying polluted waterways and related permitting decisions.
Illinois - water	IDNR floodway construction permits	State permitting records for construction within floodways, including at the Des Plaines, Fox, and Calumet river crossings.
Illinois - transportation	Illinois Commerce Commission rail safety and crossing records	State agency records on grade crossings, including inventories, orders, and quiet zone designations, held nowhere else. Chicago-area crossings benefit from a regional train-horn exemption managed by this agency.
Illinois - transportation	CMAP regional freight and congestion data	Regional planning agency's freight and traffic-congestion data.
Illinois - transportation	IDOT environmental review procedures manual	State guidance document explaining what the state's standard environmental study types actually contain.
Illinois – transportation	Illinois State Freight Plan	Identifies no-action modal split. Any merger-driven mode shift (from truck to rail) could be used to identify applicant-funded mitigation.
Illinois – transportation	IDOT Transportation Asset Management Plan	Includes bridge and pavement infrastructure condition that can inform grade-crossing analysis. Public plan available but not the underlying data.



Document Type	Resource/Document Name	Description
Section 4(f) / 6(f)	Illinois Prairie Path and Great Western Trail	Protected recreational trails near the Proviso-West Chicago and West Chicago corridor segments.
Section 4(f) / 6(f)	Fox River Trail	Protected recreational trail in Geneva; already partly addressed in an obtained Metra environmental review.
Section 4(f) / 6(f)	Hegewisch Marsh, Big Marsh, Powderhorn Lake, Eggers Grove	Protected natural and recreational areas near the Chicago Mixing Center facility; Hegewisch Marsh itself now documented via an obtained site plan.
Section 4(f) / 6(f)	Federally-funded parks along the nine corridors	Parks built with federal conservation funding, which carry extra protection against conversion to non-park use.

Source: Cambridge Systematics compilation based on review of the STB merger docket; federal and state transportation and environmental sources; project-area planning and environmental studies; comparable rail environmental reviews; and Illinois-specific transportation and environmental information.



APPENDIX A. LOCATION-BY-LOCATION EVIDENCE TABLE

The table below summarizes Illinois locations identified through the Applicants' current operating and environmental information and through IDOT, local, and other supporting information. It identifies where projected or expected transaction-related changes intersect with transportation resources, communities, passenger rail, or planned public investments; documents remaining information gaps; and identifies issues that IDOT recommends OEA address in the EIS. Where potential measures are identified, they are presented as topics for evaluation in the environmental review and are not intended at this stage as specific requested merger conditions.

Appendix A consolidates the locations, corridors, facilities, and passenger-rail/public-investment interfaces identified throughout Section 2 into a location-based evidence matrix. The 29 entries are not additive to the locations identified in Tables 2.1 and 2.2 and Section 2.5 because many of those categories overlap geographically. Where appropriate, related locations and interfaces are combined into a single corridor or geographic entry to avoid duplication.

Illinois Location / Corridor	Projected or Expected Transaction Change	Potentially Affected Resources	Basis for Inclusion	Unresolved Questions/Data Needs	Requested EIS Analysis	Potential Measures for EIS Consideration
Geneva Subdivision / Proviso–Kedzie–West Chicago–Geneva–Global 3	Proviso–Kedzie: approximately +13.63 trains/day. Other segments west of Proviso: approximately +5.3 trains/day. Several segments exceed Board environmental-analysis thresholds.	Metra UP West service; highway rail crossings; communities along the corridor; freight/passenger capacity.	Applicants' July 27 Master Data Tables; OEA preliminary screening.	Peak-period freight distribution; train lengths; time of day; gate-down changes; relationship between current segment forecasts and announced West Chicago rerouting.	Evaluate crossing delay, safety, emergency access, noise/vibration, community effects, and freight/passenger interaction where applicable.	Crossing treatments; monitoring; grade separation where warranted; operational or capacity measures identified through the EIS.
West Chicago / JB Tower	Expected interface between UP Geneva Subdivision and CN former EJ&E associated with announced rerouting; transaction-specific flows should be reconciled with current segment data.	Metra UP West; Geneva Subdivision; CN former EJ&E; nearby crossings and communities.	IDOT review identifies the single-track connection and crossover movements as an important routing interface.	Number, timing, and length of transaction-related trains using the connection; relationship to July 27 forecasts; resulting crossing and passenger exposure. Train length, connection occupancy time, and resulting effects on conflicting rail movements and nearby grade crossings.	Confirm transaction routing and evaluate environmental and transportation effects associated with the West Chicago interface.	Connection/capacity improvements; crossing treatments; operational measures where supported by EIS analysis.
NS Chicago Line / 47th Street–CP 502–Porter	Approximately +4.83 trains/day from 47th Street to CP 502 and approximately +4.4 trains/day farther east. Affected segments exceed Board thresholds.	Amtrak and other intercity passenger operations; Chicago terminal capacity; crossings; surrounding communities.	Applicants' July 27 Master Data Tables; OEA preliminary screening.	Train timing and length; terminal junction effects; passenger overlap; crossing-specific exposure.	Evaluate crossings, safety, noise, air quality, community effects, and freight/passenger interaction.	Capacity, crossing, monitoring, or operating measures identified through the EIS.
Global 2	Approximately +365 trucks/day, from 1,191 to 1,556 in Year 5.	Terminal access roads; intersections; highway rail crossings; nearby communities; truck emissions and safety.	Applicants' July 27 intermodal facility data; OEA preliminary screening.	Truck routing; hourly distribution; affected roadway segments; peak-period activity; crash and emissions exposure.	Evaluate localized roadway operations, safety, noise, air quality, and community effects.	Access, intersection, signal, routing, or emissions measures identified through the EIS.

Illinois Location / Corridor	Projected or Expected Transaction Change	Potentially Affected Resources	Basis for Inclusion	Unresolved Questions/Data Needs	Requested EIS Analysis	Potential Measures for EIS Consideration
Chicago 47th Street intermodal facility	Approximately +198 trucks/day, from 757 to 955 trucks/day.	Local roadway network; crossings; neighborhoods; nearby rail and passenger operations.	Applicants' July 27 intermodal facility data; OEA preliminary screening.	Truck routes and time of day; interaction with projected rail activity; nearby sensitive receptors.	Evaluate combined rail and truck effects on traffic, safety, noise, emissions, and access.	Roadway/access, crossing, or operational measures identified through the EIS.
Chicago Mixing Center / Hegewisch	Approximately +40 trucks/day, from 72 to 112; approximately +55.6%.	Local roads; nearby residential areas; crossings; Chicago terminal operations.	Applicants' July 27 automotive facility data; OEA preliminary screening.	Truck routes; operating hours; local roadway capacity; associated rail-volume changes.	Evaluate localized traffic, safety, noise, emissions, and community-access effects.	Access management, routing, or roadway/crossing treatments where supported.
CN former EJ&E / Wisconsin Central – northeastern Illinois	Announced rerouting could place additional transaction-related traffic on the corridor; current segment-level magnitude should be reconciled with the operating plan.	Crossings; communities; Chicago terminal operations; Metra/Amtrak interfaces; connecting railroads.	IDOT review of proposed UP/CN rerouting and northeastern Illinois operating interfaces.	Trains/day; GTM; train length; time of day; affected crossings; precise routing through West Chicago, East Joliet, and Matteson.	Define the transaction-related operating change and evaluate crossings, noise, safety, community access, and passenger interfaces along affected portions of the corridor.	Crossing, capacity, monitoring, or operational measures where warranted.
East Joliet Yard and approaches	Potential change in through traffic and yard approaches associated with routing over the former EJ&E.	Yard operations; surrounding rail network; roadway crossings; passenger rail in the Joliet area.	IDOT review identifies East Joliet as a key network interface for the announced rerouting.	Transaction-related yard activity; through versus yarded trains; timing; effects on approaches and nearby crossings.	Determine whether transaction-related activity changes at the yard or its approaches warrant detailed environmental analysis.	Yard/access, capacity, crossing, or operational measures where supported.
Global IV / Joliet–Elwood	Expected interface between rerouted freight traffic and Global IV; transaction-specific terminal and	Terminal access roads; Chicago–St. Louis passenger corridor; crossings;	IDOT review identifies Joliet–Elwood as an operating, terminal, and	Additional trains and trucks; access routes; timing; interaction with passenger service and local crossings.	Evaluate roadway access, crossings, safety, noise, emissions, community effects, and passenger	Access, crossing, capacity, or operational measures identified through the EIS.

Illinois Location / Corridor	Projected or Expected Transaction Change	Potentially Affected Resources	Basis for Inclusion	Unresolved Questions/Data Needs	Requested EIS Analysis	Potential Measures for EIS Consideration
	truck changes should be confirmed.	surrounding communities.	passenger interface.		interfaces as applicable.	
Other Chicago terminal interfaces: CP 518, CP 81st Street, Argo, Belt Junction, Blue Island Yard, Dolton Junction/Yard Center, Chicago Ridge	Traffic distribution may change depending on transaction-related routing through IHB, BRC, UP, NS, CN, and connecting railroads.	Freight junctions; Metra/Amtrak routes; yards; crossings; nearby communities.	IDOT review identifies these as locations where routing changes could create or alter operating interfaces.	Transaction-specific train routing and volumes at each location; time of day; yard use; passenger overlap.	Confirm which locations experience transaction-related changes and evaluate environmental and transportation effects where supported.	Location-specific capacity, crossing, monitoring, or operational measures identified through the EIS.
Springfield–Decatur–Sidney / Lafayette corridor	Applicant data show approximately +6.25 trains/day beginning at Decatur and +6.71 trains/day beginning at Bement.	Crossings; communities in Sangamon, Macon, Piatt, Champaign, and Vermilion Counties; passenger rail; emergency routes.	Applicants' July 27 Master Data Tables; IDOT corridor review.	Full route of additional trains; Springfield routing; timing and train length; affected crossings; passenger interfaces.	Conduct corridor-level analysis of crossings, community mobility, emergency access, noise/vibration, safety, and passenger interfaces.	Crossing, monitoring, grade-separation, capacity, or operating measures where warranted.
Springfield / Iles–Hazel Dell / 10th Street Corridor	Potential changes in freight interchange and routing associated with central Illinois traffic growth and gateway use.	Lincoln Service/Texas Eagle; 10th Street Rail Consolidation; public investment; local crossings and communities.	IDOT identifies Springfield as a freight/passenger and public-investment interface.	Actual post-transaction routing; interchange volumes; use of 10th Street capacity; relationship to planned infrastructure.	Analyze transaction-related operations in conjunction with the 10th Street Rail Consolidation and existing/planned passenger infrastructure.	Capacity, crossing, monitoring, or operational measures identified through the EIS.
Decatur	Approximately +6.25 trains/day on the Lafayette District, together with potential changes in	Public crossings; emergency routes; transit; student transportation; local streets; industrial rail	Applicant operating data and local information regarding	Transaction-specific yard activity; train length and timing; locomotive-shop changes; yard access and approach dwell associated	Evaluate mainline and yard operations together, including crossing delay,	Crossing/grade-separation measures; monitoring; emergency-access measures; noise treatments;

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	yard/switching activity and proposed capacity projects.	customers; neighborhoods.	crossings, yard activity, switching, locomotive-shop activity, dispatching, and industrial service.	with the proposed bypass-main configuration; gate-down conditions; industrial-service changes; relationship to capital projects.	safety, emergency access, transit/student transportation, noise/vibration, community access, and construction effects.	yard/capacity measures where supported.
Gibson City–Bement / Bloomington District	Approximately +0.43 trains/day, but approximately +121.8% GTM; threshold exceeded.	Crossings; communities; freight network; potential passenger interfaces.	Applicants' July 27 Master Data Tables.	Train length/weight implied by GTM growth; timing; affected crossings and communities.	Evaluate effects associated with increased freight density, including crossings, noise/vibration, safety, and community access.	Crossing, monitoring, grade-separation, or operating measures where warranted.
Peoria–Gibson City / Bloomington District	Approximately +0.29 trains/day and +61.8% GTM; threshold exceeded.	Crossings; communities; potential future Peoria–Bloomington passenger corridor.	Applicants' July 27 data and IDOT passenger-planning information.	Train length/weight; infrastructure capacity; transaction-related interaction with future passenger planning.	Evaluate crossing/community effects and identify transaction-related interfaces with planned transportation investment.	Crossing or capacity measures where supported by EIS analysis.
Bloomington Yard	Transaction-related interchange or through-traffic change has not been fully quantified.	Yard operations; local crossings; roadway access; potential passenger rail interfaces.	IDOT has identified Bloomington as a location where changes in freight routing or interchange should be confirmed.	Yard activity; interchange volumes; routing; switching; nearby crossings and access conditions.	Determine whether transaction-related yard or interchange changes warrant detailed EIS analysis.	Yard/access, crossing, or operating measures where supported.
Danville	Additional Kansas City Gateway traffic may use the corridor	Rail junctions; crossings; surrounding communities.	IDOT review identifies Danville as a	Transaction-specific routing, trains/day, timing, and affected crossings.	Confirm transaction-related changes and	Crossing, monitoring, or capacity measures where warranted.

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	through Danville; magnitude should be confirmed against the current operating plan.		potential downstate operating location associated with changed gateway routing.		evaluate environmental effects where supported.	
Tolono / Tuscola	Potential additional cross traffic associated with Kansas City Gateway and other transaction-related routing.	CN corridor; UP/CSX crossings; nearby communities; Amtrak route.	IDOT review identifies these as rail junctions where transaction-related freight may intersect passenger infrastructure.	Transaction-specific trains/day; route; time of day; junction occupancy; affected crossings.	Evaluate junction, crossing, community, and passenger-infrastructure interfaces where transaction-related changes are confirmed.	Crossing, capacity, or operational measures where warranted.
Effingham / Centralia	Potential additional cross traffic associated with St. Louis and other gateway movements.	Amtrak corridor and station areas; rail junctions; nearby crossings and communities.	IDOT review identifies both locations as freight/passenger rail interfaces.	Transaction-specific train volumes and timing; junction operations; crossing exposure.	Evaluate environmental and transportation effects where transaction-related increases are confirmed.	Junction, crossing, capacity, or operational measures where supported.
Salem and Mt. Vernon subdivisions	Generally about +2 trains/day on multiple segments. Salem GTM increases approximately 73–77% on several segments; Mt. Vernon approximately 32–36%.	Communities and public crossings through East St. Elmo, Kinmundy, Salem, Mt. Vernon, and points south.	Applicants' July 27 Master Data Tables.	Train length and time of day; crossing exposure; communities without grade-separated alternatives; emergency routes.	Evaluate the corridor as a whole, including crossings, noise, safety, emergency access, and community mobility.	Crossing, monitoring, grade-separation, or operating measures where warranted.
Kinmundy / Mount Vernon junctions	Potential increased activity at UP/CN and UP/NS/CSX interfaces; specific	Multi-railroad junctions; crossings; communities;	IDOT review identifies these locations as operating	Transaction-specific routing; trains/day by railroad; interchange activity; affected crossings.	Determine whether junction-specific changes create environmental or	Junction, crossing, capacity, or operational measures where warranted.

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	routing should be confirmed.	connecting freight routes.	interfaces within the broader southern Illinois geography.		transportation effects beyond the broader corridor analysis.	
Southern West District / A&S Junction / Metro East	Approximately +3.06 trains/day, from 10.39 to 13.45 trains/day; threshold exceeded.	Public crossings; East St. Louis, Alorton, Centreville and surrounding communities; terminal/interchange operations; passenger rail.	Applicants' July 27 Master Data Tables and associated crossing information.	Detailed routing; terminal/interchange activity; train dwell/holding; length; crossing-specific exposure.	Evaluate mainline and terminal operations jointly, including crossings, emergency access, safety, noise, air quality, and community effects.	Crossing, monitoring, grade-separation, terminal/capacity, or operating measures where warranted.
Dupo / Alton & Southern Yard and other Metro East operating locations	Potential changes associated with increased St. Louis Gateway traffic; facility-specific magnitude should be confirmed.	Yard operations; Mississippi River gateway; crossings; local roadways; nearby communities; passenger corridor.	IDOT review identifies Dupo and other Metro East locations as relevant network interfaces.	Transaction-specific yard activity, routing, trains/day, dwell, and local access effects.	Determine where gateway-related changes warrant facility- or location-specific environmental analysis.	Yard/access, crossing, monitoring, capacity, or operational measures where supported.
Centreville automotive facility	Approximately +28 trucks/day, from 7 to 35; approximately +400%.	Local roads; intersections; crossings; nearby communities.	Applicants' July 27 automotive facility data; OEA preliminary screening.	Truck routing and hours; local roadway capacity; interaction with Southern West District rail changes.	Evaluate localized truck traffic, roadway safety, crossings, noise, emissions, and community effects.	Access, routing, intersection, or crossing measures where warranted.
Wood River / East St. Louis passenger corridor interface	Potential additional freight/interchange activity; magnitude should be confirmed against the current operating plan.	Lincoln Service; shared rail infrastructure; crossings; communities.	IDOT identifies these locations as potential freight/passenger interfaces within the St. Louis gateway.	Current transaction-specific routing and trains/day; time of day; passenger infrastructure overlap.	Confirm transaction-related changes and identify geographic interfaces with existing passenger rail infrastructure. Detailed passenger effects are addressed in Section 4.	Capacity, crossing, or operational measures where supported by the EIS.

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DeKalb–Elburn	Transaction-specific freight change requires further definition; the corridor is also associated with planned passenger service expansion.	Planned passenger service; Metra UP West corridor; rail capacity; public investment.	IDOT has identified the corridor in connection with future passenger service and potential infrastructure needs.	Transaction-related freight forecast west of Elburn; location of planned passenger infrastructure; no-transaction versus with-transaction infrastructure needs.	Determine whether transaction-related freight operations alter the infrastructure or geographic area that should be evaluated in connection with planned passenger investment.	Capacity or infrastructure measures identified through the EIS; detailed passenger-service issues addressed in Section 4.
Morrison	Increased traffic may compound train backups associated with Mississippi River swing-bridge operations; transaction-specific change should be quantified.	Highway crossings; school-bus routes; fire, police, and medical access; community mobility.	IDOT has identified Morrison as an example where bridge-related train backups can affect local access.	Projected trains/day and train length; bridge closures; rail queues; crossing blockage duration; availability of alternative emergency routes.	Quantify transaction-related changes in crossing blockage and emergency-access conditions.	Grade-separated access; crossing monitoring; emergency-response coordination; other measures identified through the EIS.
Dwight	Potential UP/NS operating interaction at the NS Kankakee Line / UP Joliet Subdivision; current transaction routing should be confirmed.	Lincoln Service; rail-rail crossing; local crossings and communities.	IDOT has identified the location as a potential freight/passenger and rail-rail interface.	Whether additional freight would be routed through Dwight; frequency; timing; junction and crossing effects.	Confirm operating changes and identify any resulting environmental or transportation effects. Passenger-service effects are addressed in Section 4.	Rail-rail crossing, capacity, or operating measures where warranted.
Illinois transaction-related capital projects: Griggsville, Decatur/CP	Proposed siding, double-track, crossover, and CTC improvements associated with post-transaction operations.	Adjacent land uses; crossings; roadway access; communities; passenger infrastructure; water, cultural, and other	Applicants identify the Griggsville Siding Extension, Decatur Double Track, CP Brush	Precise footprint; right-of-way; temporary access; construction schedule; adjacent resources; relationship to existing public projects.	Conduct project-level environmental review appropriate to each capital improvement, including	Design refinements; construction staging/access measures; crossing treatments; resource-specific mitigation



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Brush, Vance, Eldon–Ross Lane, Tilton		environmental resources; construction areas.	Phase II, Vance Siding Extension, Eldon–Ross Lane CTC, and Tilton Universal Crossover as transaction-related investments.		construction and operational effects.	identified through the EIS.

Source: Cambridge Systematics analysis based on Applicants' July 27, 2026 Updated Master Segment Tables and facility data; UP-NS operating and routing information; OEA Preliminary Consultation materials; IDOT review; Amtrak and Metra route information; Illinois Commerce Commission information; and Quandel Consultants' technical analysis of the proposed merger.