

Received by email on March 17, 2021

Dear FRA,

The Vermont Rail Action Network is a citizens advocacy group working for better train service in Vermont. We care about safety and have been encouraged by the recent good work by FRA on creating data on trespassing. Thank You.

We write to comment on the latest information collection because an obvious (to us) problem is apparent: by collecting data from police agencies you will not get data on trespassing exactly; what you will get is data on who police go after for trespassing. Most obviously we know from other information that the police are twice as likely to stop African-Americans for a crime than whites (it isn't known if this is strictly racism or if it reflects a higher amount of policing in African-American areas).

The Vermont Rail Action Network strongly urges the FRA not to collect race ethnicity data because we do not believe it will be accurate and is unlikely to be very important. Collecting that data is likely to perpetuate racial stereotypes but not actually do much good.

It is also probable that age data will not reflect the actual demographics of trespassers, but there is less obvious harm that might come of this. Additionally one would assume that location data will reflect areas with police presence as much as actual preponderance of trespassing, yet location data seems very valuable for planning interventions even if the underlying data is flawed.

The basic approach of documenting locations and characteristics of trespassers and trespassing is terrific - very important. We commend FRA for this effort.

Christopher Parker
Vermont Rail Action Network Executive Director
(802) 536-4607
railvermont.org