



# Chicago Metropolitan Agency for Planning

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August 13, 2019

Via e-filing: <https://www.regulations.gov/comment?D=FRA-2019-0004-0008>

Attn: Comments on OMB Control Number 2130-NEW  
Mr. Robert Brogan  
Information Collection Clearance Officer  
Office of Railroad Safety, Regulatory Analysis Division  
Federal Railroad Administration

Attn: Docket No. FRA-2019-0004-N-10  
Comments on OMB Control Number 2130-NEW  
Inquiry into Blocked Highway-Rail Grade Crossings throughout the  
United States

Dear Mr. Brogan,

Thank you for the opportunity to comment on the Federal Railroad Administration's (FRA's) proposed blocked railroad crossing information collection activities. Blocked crossings are an important issue for the northeastern Illinois region represented by the Chicago Metropolitan Agency for Planning (CMAP). Our seven-county region has a population of more than 8.5 million residents, is at the confluence of six Class-1 railroads, and serves as North America's freight hub. The region sees 500 freight trains and 760 passenger trains crossing more than 1,600 highway-rail grade crossings on a daily basis. Delay at grade crossings hampers mobility for many stakeholders in the Chicago region, including local public safety agencies, commercial and industrial interests, motorists, bicyclists, and pedestrians. As the FRA describes, blocked crossings present particular safety issues for all modes.

We believe that the collecting information about frequency, location, and impact of blocked crossings is necessary to help FRA solve this nationwide problem. However, we are concerned that the activities proposed will provide ad hoc and non-representative data of the delay occurring both in our region and throughout our nation. We are particularly concerned that relying on the general public or law enforcement to report instances may skew the benefits of any future FRA action toward those most able to report, meaning those communities with knowledge of this resource and sufficient staffing, time, and technical ability to use it. This may be particularly impactful for low income or very small communities, who would benefit from improved safety and infrastructure at frequently blocked crossings.

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While information from the general public and law enforcement can provide critical local information, we suggest that the FRA develop a scientifically sound method for estimating motorist delay, based on stratified samples of crossings with important characteristics. Such characteristics might include proximity to rail-rail at-grade crossings, classification yards and intermodal or transload terminals, passenger rail stations, and low-income and minority populations, as well as volume of traffic on intersecting and adjacent highways.

Potential techniques for alternative, more automated, more representative data collection opportunities for railroad crossing delay abound and should be explored. Sources of such information might include the following:

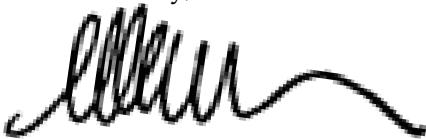
- Train delay information:
  - Event recorders, e.g., remote terminal units,<sup>1</sup> which are part of modern crossing equipment.
  - Data from positive train control systems.
  - Event recorders for highway traffic signals that are interconnected with railroad crossings.
- Impacts on motorists, trucks, bicyclists, and pedestrians:
  - Waypoint records of vehicles crossing railroad crossings, available from such organizations at the American Transportation Research Institute and Inrix, Inc.
  - Geoprocessed navigation and mobile-phone data for multi-modal travelers, including pedestrians, available from such organizations as StreetLight Data, Inc.

Collecting information from these sources would likely have a low burden because the information is already being collected or is automated, regularly analyzed, and simple to report. Using these data sources would also minimize the burden and reliance on the public to report. Many of these sources provide comprehensive data on differing aspects of delay created at grade crossings. The railroads may have other internal data sources, as well. We suggest that the FRA evaluate options to combine multiple data sources to understand delay and its impacts.

In summary, we are concerned that the proposed data collection will have limited value. Data that is not representative may lead FRA—or planners, municipalities, and railroads—to develop less effective solutions. We are particularly concerned that the impacts of blocked crossings on low income and minority communities will be under-reported, and therefore may lead to less access to comprehensive safety solutions. Therefore, we suggest that the FRA pursue a more sound method for collecting the information. We suggest a number of alternative, more automated ways to collect valid data that the FRA could explore.

Thank you again for the opportunity to comment on these information collection activities.

Sincerely,

A handwritten signature in black ink, appearing to be 'M. J. ...', written over a horizontal line.

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<sup>1</sup> U.S. Surface Transportation Board. *Decision No. 27 [ordered Canadian Nation Railway Company (CN) to pay \$250,000 to the U.S. Treasury for knowingly violating the Board's orders mandating monthly and quarterly CN status report regarding each crossing blocking occurrence on the former E&E West rail line exceeding 10 minutes in duration. Decided December 20, 2010. Docket FD\_35087\_0. <https://www.stb.gov/decisions/readingroom.nsf/WebDecisionID/41302?OpenDocument>.*

Erin Aleman  
Executive Director

HH: EA/es