



# Chicago Metropolitan Agency for Planning

233 South Wacker Drive  
Suite 800  
Chicago, Illinois 60606

312 454 0400  
[www.cmap.illinois.gov](http://www.cmap.illinois.gov)

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Surface Transportation Board  
Attn: **Docket No. EP 724 (Sub-No. 4)**  
395 E Street, SW  
Washington, DC 20423-0001

To whom it may concern:

Thank you for this opportunity to comment on the Supplemental Notice of Proposed Rulemaking (SNPR) for the reporting of rail performance data by the Class I railroads and the Chicago Transportation Coordination Office (CTCO). The Chicago Metropolitan Agency for Planning (CMAP) supports the SNPR, which leaves unchanged the proposed reporting requirement for the Class I railroads and CTCO about performance in the Chicago Terminal. CMAP also appreciates that the SNPR specifically asked for comments on our agency's additional reporting requirements. CMAP continues to support our prior proposal for the railroads to provide further data that will offer a more complete picture of rail performance in the Chicago area and across the nation.

First, we are pleased to report that in recent weeks, CMAP and the Association of American Railroads (AAR) reached an agreement for AAR to provide to CMAP some of the above information -- including yard inventories, terminal dwell times for railcar yards, the number of railcars en route and processed, and the overall crosstown transit times -- on a weekly basis for the Chicago terminal. This cooperative reporting is an important step in the right direction and will improve long-term planning efforts in the Chicago region. At the moment, CMAP receives this information directly from AAR. CMAP believes this reporting should be a requirement and be made publicly available because other entities are likely to be able to use this information for their own public interest purposes.

While we are pleased with the information AAR is providing, CMAP believes that better information on the performance of intermodal trains, such as on-time performance by intermodal yard would provide a fuller, clearer picture. Intermodal trains not only represent a growing share of the nation's rail traffic, they also have a particularly strong economic impact on the Chicago area. While much of the railcar traffic in the Chicago area simply passes through, intermodal shipments tend to have their origins or destinations in the metropolitan area, providing competitive options for local shippers and also supporting the region's strong logistics sector.

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CMAP reiterates its suggestions to the Surface Transportation Board (STB) on other ways to improve the depth and breadth of the EP 724 data reporting. At the national level, those improvements would include expanding the number of yards included in reporting of terminal dwell times by Class I railroad, as well as providing contextual information such as the previous 52-week average dwell time. At the regional level for the Chicago terminal, CMAP believes the STB should make permanent the reporting on crosstown travel times, as mentioned above, and also data measuring speed, volume, and train length for key rail corridors, including those supported by the federal government through the Chicago Region Environmental and Transportation Efficiency (CREATE) program. The reporting should also include measures of delay at key locations, such as Forest Hill and Belt Junction, as well as intermodal lifts.

The additional data described above would provide a richer understanding of rail performance, allowing public officials to better understand the impacts of freight rail activity on commuter and intercity passenger rail as well as motorist delay at highway-rail grade crossings. In turn, this improved understanding of freight rail operations would allow public officials to better evaluate and prioritize investments in rail improvements such as those made via the CREATE program, ensuring the best use of scarce public resources.

Thank you for the opportunity to comment on the Supplemental Notice of Proposed Rulemaking and for your attention to this important regional and national issue.

Sincerely,

Chicago Metropolitan Agency for Planning (CMAP)



Thomas G. Kotarac  
Deputy Executive Director for Policy and Programming

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