



**Memo on Freight Interference on Metra's Milwaukee
District-West (MD-W) Line
(January 2017-September 2022)**

**Office of Congressman Raja Krishnamoorthi
Eighth District of Illinois
U.S. House of Representatives**

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krishnamoorthi.house.gov**

Overview

The following memo highlights the frequency and duration of delays caused by freight interference on Metra's Milwaukee District-West ("MD-W") line, which runs from Elgin, Illinois to Chicago Union Station ("CUS") in downtown Chicago.¹ Canadian Pacific ("CP") freight trains operate on Metra's MD-W line and are responsible for approximately 90% of the freight interference delays on the MD-W line, according to Metra.²

This memo draws from Metra's monthly on-time performance reports, which are publicly available online,ⁱ and raw data from the past five years specific to the MD-W line also provided by Metra. The memo considers the frequency (how often there are instances of delays) and duration (how long the delays are in train minutes) to capture the negative impact of freight interference on Metra delays and Metra commuters.

The memo makes the following key findings:

- 1) CP's three daily freight trains (on average) along Metra's MD-W line cause regular delays to Metra trains, even during peak times.³
- 2) The total annual frequency of delays caused by freight interference on the MD-W line almost tripled between 2017-2021, and disproportionately more of these delays occurred during peak periods.
 - During peak periods, these delays grew to be almost *six times* more frequent.
- 3) The total annual *duration* of delays caused by freight interference on the MD-W line almost tripled between 2017-2021, and peak periods were disproportionately negatively affected.
 - During peak periods, these durations grew to be almost *six times* longer. On average, about 45% of delays caused by freight interference during peak periods between 2017-2021 were greater than 10 minutes.

Background

Metra's MD-W line is a vital part of Chicago's suburban public transit system. MD-W operates between CUS and Elgin, Illinois, which is approximately 40 miles west of Chicago's downtown. The MD-W line includes 22 stations and serves an area with a population of nearly one million people.ⁱⁱ In 2019, pre-pandemic, Metra operated 58 daily MD-W trains, including during morning and evening "peak period" trains, and provided nearly 6 million annual passenger trips.ⁱⁱⁱ Any delays on Metra's MDW line negatively impact daily commuters, families, employers, and visitors who depend on a reliable commuter rail connection from Elgin to downtown Chicago.

Metra cannot operate at peak efficiency on its MD-W line because freight trains frequently interfere with Metra train traffic, even during peak times, thereby delaying commuters. CP operates three daily trains, on average,^{iv} which are responsible for approximately 90% of the freight interference delays on the MD-W line, according to Metra. This is because although

¹ Metra's CP freight trains also cause delays on the Milwaukee District-North ("MD-N") line; however, this memo specifically focuses on the MD-W line because most communities running from Elgin to Bensenville along the MD-W line are in the Eighth District of Illinois (IL-08), which Congressman Raja Krishnamoorthi represents.

² Canadian National also operates on a portion of the MD-W line and is responsible for other freight interference delays on this line.

³ For Metra trains arriving in Chicago between 6:30 a.m.-9:30 a.m. and departing Chicago between 3 p.m.-7 p.m.

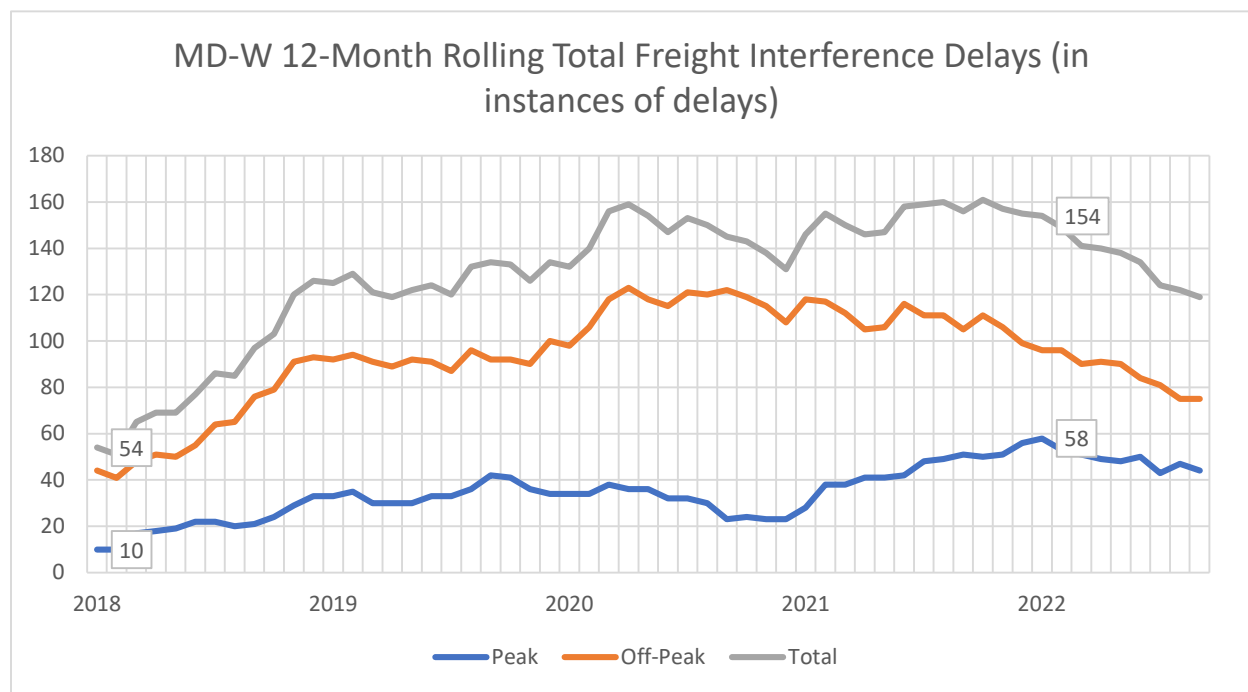
Metra owns the MD-W line, CP has dispatching rights on the line, meaning that CP controls which trains receive preference in the flow of traffic. Though CP and Metra have a Trackage Agreement for Metra to operate during essential, specified peak hours, “CP violates this contractual obligation regularly” by giving preference to CP freight over Metra commuters.^v CP freight interference causes even more delays during non-peak periods, despite CP’s obligation under the Trackage Agreement to only “make reasonable adjustments” to train traffic if they “do not unreasonably disrupt or delay trains” during non-peak periods.^{vi}

This memo analyzes the frequency and duration of delays caused by freight interference, particularly by CP, on Metra’s MD-W line to show the negative impact that freight interference has on delays and, therefore, commuters.

Key Finding #1: CP’s 3 daily freight trains (on average) along Metra’s MD-W line cause regular delays to Metra trains, even during peak times.

For the last ten years, freight interference has been a leading cause for delays on Metra’s MD-W line.^{vii}⁴ Between 2017-2021, there were 122 delays, on average, caused by freight interference each year; 27% of those delays were during peak times.^{viii} Between 2017-2021, each delay was just over 12 minutes during peak times and just over 13 minutes during non-peak times, on average.^{ix}

As seen in the graph below, which depicts 12-month rolling totals of freight-caused delays, delays peaked in October 2021, when CP filed its application with the Surface Transportation Board to merge with Kansas City Southern (“KCS”), and have since started to decrease. However, CP continues to violate its Tracking Agreement with Metra and cause delays. Current freight interference delays are still at April 2019 pre-pandemic levels.



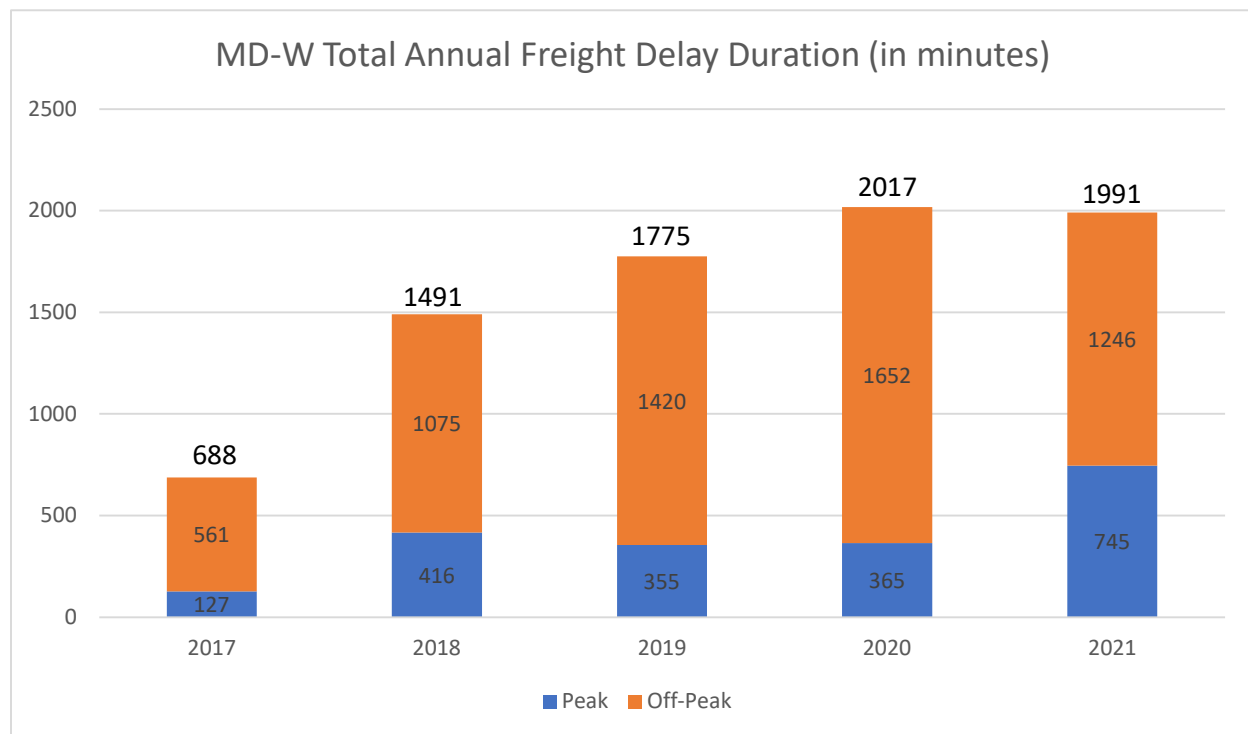
⁴ Signal/ switch failures are the other main leading cause for delays on the MD-W line.

Key Finding #2: The total annual *frequency* of MD-W delays caused by freight interference almost tripled between 2017-2021, and disproportionately more of these delays occurred during peak periods.

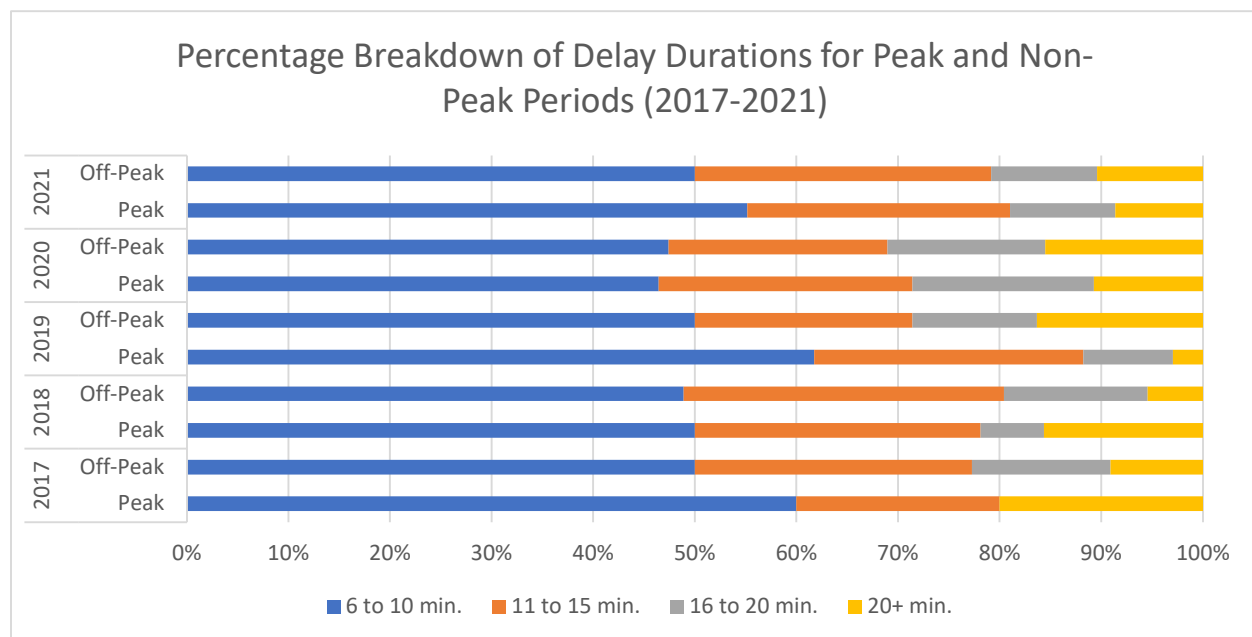
As seen in the graph of 12-month rolling totals of freight delays on the previous page, there is a steady trend of increasing frequency of freight interference on the MD-W line. In 2017, there were 54 total delays caused by freight interference, 10 of which were during peak periods.^x In 2021, there were 154 total delays caused by freight interference, 58 of which were during peak periods.^{xi} Therefore, between 2017 and 2021, the total annual *frequency* of delays caused by freight interference on Metra's MD-W line almost *tripled*; during peak periods, these delays grew to be almost *six times* more frequent. Furthermore, as the frequency of total annual delays increased, disproportionately more delays occurred during peak periods.

Key Finding #3: The total annual *duration* of MD-W delays caused by freight interference almost tripled between 2017-2021, and peak periods were disproportionately negatively affected.

The next graph highlights the increase in the *duration* of freight interference delays over time since 2017, particularly during peak periods. Between 2017 and 2021, total annual delay durations from freight interference almost tripled from 688 minutes to 1991 minutes; during peak periods, total delay durations from freight interference grew to be almost six times longer, from 127 minutes to 745 minutes. Therefore, as the duration of total annual delays increased, disproportionately more delays occurred during peak periods.



The bar graph below shows the percentage breakdown of delays that were 6-10 minutes, 11-15 minutes, 16-20 minutes, and 20+ minutes for peak and non-peak periods since 2017. As seen in the graph, between 2017 and 2021, about 45% of delays during peak periods were greater than 10 minutes.^{xii} Between 2017-2021, almost 10% of MD-W delays caused by freight interference each year during peak periods, on average, were longer than 20 minutes.^{xiii} In 2020 and 2021, almost 10% of delays caused by freight interference on the MD-W line during peak periods were longer than 20 minutes, on average.^{xiv}



Conclusion

In reference to the impact of the CP-KCS railway merger, CP has stated that the “transaction will not adversely impact Metra’s commuter services and will not meaningfully increase freight traffic on lines shared with Metra.”^{xv} However, this memo shows that as train traffic already stands, CP’s 3 daily freight trains (on average) along Metra’s MD-W line already cause regular delays to Metra trains, even during peak times. These delays, caused by CP’s dispatching practices and its inability to maintain its current commitments with Metra, would likely worsen if freight trains were added to Metra’s lines. Given that CP projects that the proposed merger would at least quadruple freight traffic along the MD-W line,^{xvi} it is reasonable to assume, based on the evidence in this memo, that there would be significant impacts to Metra’s MD-W service and operations, resulting in significant delays for commuters in the Chicagoland area, particularly during peak periods. This conclusion reaffirms that the STB must re-assess the impact of the proposed merger on Metra and require comprehensive oversight conditions and mitigation measures to support Metra and its commuters, if the STB approves the merger.

ⁱ <https://metra.com/time-performance-reports>.

ⁱⁱ 2020 System Report, MD-W. Page 9.

ⁱⁱⁱ OEA, Canadian Pacific Acquisition of Kansas City Southern: Draft Environmental Impact Statement, August 5, 2022, Chapter 3: Freight and Passenger Rail Safety, Page 3.1-28.

^{iv} Metra Operations.

^v Metra STB filing, March 15, 2022, Page 11.

^{vi} Ibid.

^{vii} According to Metra's monthly on-Time performance reports, which include the frequency of train delays by cause and line based on averages over the previous five years, the top two causes for the MD-W line's train delays have been freight interference and signal/switch failures for every 5-year period, except 2015-2019. This data can be found on Table 9.b. of the December 2017 report and on Table 6.b of the reports from December 2018, December 2019, December 2020, and December 2021.

^{viii} Appendix. Table 1.

^{ix} Ibid.

^x Appendix. Table 2.

^{xi} Ibid.

^{xii} Ibid.

^{xiii} Ibid.

^{xiv} Ibid.

^{xv} CP filing with the STB, July 2022.

^{xvi} Ibid.

Appendix: Supporting Data to Memo on Freight Interference on Metra’s Milwaukee District-West (MD-W) Line

Table 1. Frequency and Duration of Delays Caused by Freight Interference during Peak and Non-Peak Periods on the MD-W line (2017-2021).

		2017	2018	2019	2020	2021	Total	2017-2021 Average	% of Total Average	2017-2021 Average Duration Per Delay (in minutes)	2021 vs. 2017
Frequency (in number of delays)	Peak	10	33	34	28	58	163	32.6	26.68%		5.8
	Non-Peak	44	92	98	118	96	448	89.6	73.32%		2.18
	Total	54	125	132	146	154	611	122.2	100.00%		2.85
Duration (in minutes)	Peak	127	416	355	365	745	2008	401.6		12.32	5.87
	Non-Peak	561	1075	1420	1652	1246	5954	1190.8		13.29	2.22
	Total	688	1491	1775	2017	1991	7962	1592.4		13.03	2.89

Table 2. Breakdown of Freight Interference Delay Durations for Peak and Non-Peak Periods on the MD-W line (2017-2021).

	2017		2018		2019		2020		2021		
Delay intervals	Peak	Non-Peak	Peak	Non-Peak	Peak	Non-Peak	Peak	Non-Peak	Peak	Non-Peak	Total
6 to 10 min.	6	22	16	45	21	49	13	55	32	48	307
11 to 15 min.	2	12	9	29	9	21	7	25	15	28	157
16 to 20 min.	0	6	2	13	3	12	5	18	6	10	75
20+ min.	2	4	5	5	1	16	3	18	5	10	69
Total	10	44	32	92	34	98	28	116	58	96	608
% 10+ min (Peak only)	40.00%		50.00%		38.24%		53.57%		44.83%		45.68%
% 20+ min (Peak only)	20.00%		15.63%		2.94%		10.71%		8.62%		9.88%