

From nobody Fri Dec 6 05:51:49 2019
Content-Type: multipart/mixed; boundary="=====
MIME-Version: 1.0
Subject: RE: Illinois Freedom of Information Act. Request: Metra FRA plans
From: "'81337-81752130@requests.muckrock.com'"
<81337-81752130@requests.muckrock.com>
To: publicaccess@atg.state.il.us
Date: Fri, 06 Dec 2019 10:51:49 -0000
Message-ID:
<20191206105149.2931.90309@d67ded32-5718-4056-8e65-980e2029d723.prvt.dyno.rt.heroku.com>

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boundary="=====
MIME-Version: 1.0

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Content-Type: text/plain; charset="utf-8"
MIME-Version: 1.0
Content-Transfer-Encoding: quoted-printable

December 6, 2019

This is a follow up to a previous request:

Joseph Durso
MuckRock News
DEPT MR 81337
411A Highland Ave
Somerville, MA 02144-2516
81337-81752130@requests.muckrock.com

December 6th, 2019

Sarah Pratt
Public Access Counselor
Office of the Attorney General
500 S. 2nd Street
Springfield, Illinois 62701

By Email

Ms. Pratt,

This is to request review of partial denial of a FOIA request in accordance with 5 ILCS 140/9.5(a).

I have attached my initial request and the letter from the agency, Metra, denying release of portions of the requested records, including fully denying release of the third item requested, Metra=E2=80=99s Program Compliance Submission for Passenger Train Emergency Preparedness plan. I request review=

only of that denial.

The Passenger Train Emergency Preparedness plan is a document that Metra and all passenger railroads are required by Title 49, Section 239 of the Code of Federal Regulations to produce and submit to the Federal Railroad Administration for approval. The Federal Railroad Administration has wielded this emergency preparedness plan approval mechanism to opaquely and indirectly dictate economic aspects of passenger train operations in ways it is arguably not currently otherwise empowered to do, such as the controlling the number of crew members required to be on board trains. FRA said as much in a 2016 Notice of Proposed Rulemaking, stating amid discussion of a crew size rule that ultimately did not come into effect that "Although it has done so indirectly, FRA has rejected some one-person passenger operations based on the passenger train emergency preparedness approval process required under 49 CFR 239.201." (<https://www.federalregister.gov/documents/2016/03/15/2016-05553/train-crew-staffing>). I sought Metra's emergency preparedness plan so that I could better understand this indirect mechanism by comparing FRA approved crew size language for a longstanding commuter railroad like Metra, with language approved for newer commuter railroads, such as those in Denver and Salt Lake City. =

In entirely denying release of the item, Metra cited Section 7(1)(v) of FOIA. Section 7(1)(v) exempts records "only to the extent that disclosure could reasonably be expected to jeopardize the effectiveness of the measure or the safety of the personnel who implement them or the public." On systems like Metra, train crew staffing is typically actually dictated by labor contracts at levels in excess of what might be required by the FRA, and those contracts are unlikely to be so closely protected. Furthermore, the number of crew members on the train would tend to be plainly obvious by regular observation to passengers. Anyone riding the train can count the number of uniformed conductors collecting tickets, or see how many engineers are sitting behind the window of the locomotive as the train enters the station. Disclosure of any language in the plan regarding train crew staffing requirements is unlikely to jeopardize the effectiveness of the sort of measure cited in the exemption, nor the safety of anyone, and so should not be exempt from release.

More generally, experience examining other Passenger Train Emergency Preparedness plans leads me to suspect Metra's plan may contain other portions that can be released without so jeopardizing the effectiveness of any measure, or the safety of anyone, such as the frequency with which Metra staff must receive training on the contents of plan, which Metra crew members must receive CPR training, etc. Any such portions should also not be exempt from release.

I do not dispute that some portions of the requested record may rightfully be exempt from release under the exemption the agency cited. I request that you find that only sensitive portions truly subject to the cited exemption should be withheld, and that the agency can and should redact such portions and release the segregable remainder of the record.

I've separately emailed this request for review to the agency. Thank you for your consideration.

Sincerely,

Joseph Durso

Filed via MuckRock.com

E-mail (Preferred): 81337-81752130@requests.muckrock.com

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On Dec. 5, 2019:

Subject: RE: Illinois Freedom of Information Act. Request: Metra FRA plans METRA, please disregard this message. Just attaching responsive files from = this request to the email chain for my record keeping purposes.

Thanks,

Joseph Durso

On Nov. 1, 2019:

Subject: RE: Illinois Freedom of Information Act. Request: Metra FRA plans Hi,

I was able to access the link from this morning with no issues. Thanks again for your assistance with this request.

Sincerely,

Joseph Durso

=

On Nov. 1, 2019:

Subject: 19-F0IA-302 Response Metra FRA Plans (MuckRock News - Durso, J.)
Mr. Durso:

If you are having difficulty accessing your records through the link I sent you this morning, please contact me via telephone at the number listed below.

Thank you,
Angela K. Ollie
[cid:image003.jpg@01D45F13.64678430]
Corporate Paralegal
547 W. Jackson Blvd., 15th Fl.
Chicago, IL 60661

On Nov. 1, 2019:
Subject: RE: Illinois Freedom of Information Act. Request: Metra FRA plans
Thanks very much for that. =

All the best,

Joseph Durso

On Nov. 1, 2019:
Subject: 19-F0IA-302 Response Metra FRA Plans (MuckRock News - Durso, J.)
Dear Mr.Durso:

Below is a link to Metra's Response to your above-mentioned request for records. Access to your records will expire on the date noted below.

Thank you,
Freedom of Information Officer

Metra is one of the largest and most complex commuter rail systems in North America, serving Cook, DuPage, Will, Lake, Kane and McHenry counties in northeastern Illinois. The agency provides service to and from downtown Chicago with 242 stations over 11 routes totaling nearly 500 route miles and approximately 1,200 miles of track. Metra operates nearly 700 weekday trains, providing nearly 290,000 passenger trips each weekday.

Documents per your FOIA request are now available for download. The link to transfer your file(s) will expire on Friday, November 8, 2019 12:00 AM

<https://foiaftp.metrarr.com/?ShareToken=3D257C268D7E1655276D2B60F77E5B60B58-F529CD5>

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On Oct. 7, 2019:

Subject: Illinois Freedom of Information Act. Request: Metra FRA plans Greetings,

Pursuant to the Illinois Freedom of Information Act., I request the following records, as pertain to the passenger train services operated by Metra itself:

1. The current conductor certification/qualification plan submitted to and approved by FRA in accordance with 49 CFR 242 (or predecessor regulations).
2. The current engineer certification/qualification plan submitted to and approved by FRA in accordance with 49 CFR 240 (or predecessor regulations).
3. The current passenger train emergency preparedness plan (aka "E-plan") submitted to and approved by the FRA in accordance with 49 CFR 239 for the Metra-operated passenger rail service.

Just to reiterate I am not seeking any documents that pertain exclusively to services operated by BNSF or UP or NICTD that Metra may be in possession of, only those that pertain to Metra's own operations.

The requested records will be immediately and freely available to the public on muckrock.com, and this request is not being made for any commercial purpose.

In the event that there are fees, I would be grateful if you would inform me of the total charges in advance of fulfilling my request. I would prefer the request filled electronically, by e-mail attachment if available or CD-ROM if not.

Thanks for your help.

Cheers,

Joseph Durso

Filed via MuckRock.com

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felfuA&next=3Dhttps%3A%2F%2Fwww.muckrock.com%2Faccounts%2Flogin%2F%3Fnext%3=D%252Faccounts%252Fagency_login%252Fchicago-metra-6249%252Fmetra-fra-plans-81337%252F%253Femail%253Dpublicaccess%252540atg.state.il.us

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<p>Joseph Durso</p>

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[cid:image003.jpg@01D45F13.64678430=]
Corporate Paralegal
547 W. Jackson Blvd., 15th Fl.
Chicago, IL 60661</p>

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