



## Decision and Reasons for Decision

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<b>Citation:</b>	<b><i>Marigliano and Tablelands Regional Council</i> [2018] QICmr 11 (15 March 2018)</b>
<b>Application Number:</b>	<b>313583</b>
<b>Applicant:</b>	<b>Marigliano</b>
<b>Respondent:</b>	<b>Tablelands Regional Council</b>
<b>Decision Date:</b>	<b>15 March 2018</b>
<b>Catchwords:</b>	<b>ADMINISTRATIVE LAW - RIGHT TO INFORMATION - REFUSAL TO DEAL WITH ACCESS APPLICATION - EFFECT ON AGENCY'S FUNCTIONS - whether work involved in dealing with application would, if carried out, substantially and unreasonably divert resources of agency from their use by the agency in performing its functions - sections 41 and 42 of the <i>Right to Information Act 2009</i> (Qld)</b>

### REASONS FOR DECISION

#### Summary

1. The applicant applied to the Tablelands Regional Council (**Council**) under the *Right to Information Act 2009* (Qld) (**RTI Act**) for access to documents concerning maintenance and engineering operations regarding a nominated bridge.
2. Council refused to deal with the applicant's access application (**Application**), on the ground doing so would substantially and unreasonably divert Council's resources from their use in performance of Council's functions.
3. I affirm Council's decision. I am satisfied the work involved in processing the Application would substantially and unreasonably divert Council's resources. Council may therefore refuse to deal with the Application, under section 41 of the RTI Act.

#### Background

4. The applicant's expansively-framed Application is set out in full in Appendix B to these reasons.<sup>1</sup> It sought a range of engineering, maintenance and other materials concerning the 'Wright's Creek Bridge', for the 20 year period January 1997 to January 2017.
5. By letter dated 18 October 2017, Council gave the applicant written notice of intention to refuse to deal with the Application (**Notice**). Council advised the applicant that it estimated 'in excess' of 150 documents related to the Application, further noting that 'the

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<sup>1</sup> The text in Appendix B was set out in a 10-page attachment to the approved application form the applicant was required to lodge with Council under section 24 of the RTI Act.

number of actual pages could be in the thousands'. Council estimated that more than 160 hours – or 22 'working days' – would be required to process the Application, and attached to the Notice a table setting out its calculations in this regard. Given its lack of a dedicated RTI officer, Council concluded that undertaking the work necessary to deal with the Application would substantially and unreasonably divert Council resources from their use in performance of Council's functions.

6. Council's Notice invited the applicant to consider narrowing the terms of the Application, suggesting how this might be achieved and advising him of the consultation period prescribed under the RTI Act and the due date for any reply.
7. The applicant replied, confirming the original scope of the Application.<sup>2</sup>
8. By letter dated 25 October 2017, Council decided to refuse to deal with the Application under section 41 of the RTI Act.
9. On 30 October 2017, the applicant applied to the Office of the Information Commissioner (**OIC**) for external review of Council's decision.
10. Significant procedural steps are set out in Appendix A to this decision.

#### **Reviewable decision**

11. The decision under review is Council's decision dated 25 October 2017.

#### **Evidence considered**

12. Any evidence, submissions, legislation or other material considered in reaching this decision is referred to in these reasons (including footnotes and appendix).

#### **Relevant law**

13. Parliament intends that an agency receiving an access application will deal with that application unless dealing with the application would, on balance, be contrary to the public interest.<sup>3</sup> The only circumstances in which dealing with an access application would, on balance, be contrary to the public interest are set out in sections 40, 41 and 43 of the RTI Act.
14. Relevantly, section 41(1)(a) of the RTI Act permits an agency to refuse to deal with an access application if the agency considers the work involved in dealing with the application would, if carried out, substantially and unreasonably divert the resources of the agency from their use by the agency in the performance of its functions.
15. Before making a decision to refuse to deal with an application under section 41(1)(a), an agency must fulfil certain procedural steps:<sup>4</sup>

(a) give the applicant written notice:

- o stating an intention to refuse to deal with the application

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<sup>2</sup> Email dated 23 October 2017.

<sup>3</sup> Section 39 of the RTI Act.

<sup>4</sup> Section 42(1) of the RTI Act.

- advising that for the prescribed consultation period,<sup>5</sup> the applicant may consult with the agency with a view to making an application in a form that would remove the ground for refusal; and
  - stating the effect of subsections section 42(2) to (6) of the RTI Act.
- (b) give the applicant a reasonable opportunity to consult; and
- (c) as far as reasonably practicable, give the applicant any information that would help the making of an application in a form that would remove the ground for refusal.

## Findings

### ***Did Council satisfy the procedural prerequisites before refusing to deal with the Application?***

16. Yes.
17. The Notice stated an intention to refuse to deal with the Application and advised the applicant he had until 1 November 2017 to consult with Council *'to amend the scope of your request into a form which would mean Council could deal with it'*. Council's Notice also stated the effect of sections 42(2) to (6) of the RTI Act<sup>6</sup> by explaining that:
- the applicant could give a written response confirming or narrowing the Application
  - if the applicant narrowed the Application, Council was not required to allow him another opportunity to consult; and
  - if the applicant did not respond, the Application would be considered withdrawn.
18. I am satisfied the Notice complied with relevant requirements of the RTI Act.
19. Having provided the applicant with notice in the correct form, Council then gave him a reasonable opportunity to consult by:
- providing the standard 10 business day *'prescribed consultation period'*,
  - discussing the matter with him by telephone;<sup>7</sup> and
  - inviting the applicant to contact Council if additional time was required.
20. Council also extended the necessary assistance to the applicant to assist him to reframe the Application in a form Council could process. By telephone<sup>8</sup> and in its Notice, Council explained to the applicant ways in which the Application might be made more manageable, by:
- narrowing the range of documents sought
  - specifying particular date periods; and
  - eliminating from the scope of the Application documents that the applicant had himself supplied to Council or received from Council.
21. Additionally, Council's Notice included an attachment listing the approximate number of documents, categories and estimated time to complete the work involved. I am satisfied that, as far as was reasonably practicable, Council gave the applicant information to help him to make an application capable of being processed.<sup>9</sup>

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<sup>5</sup> Under section 42(6) of the RTI Act, the *'prescribed consultation period'* for a written notice under section 42(1)(a) is 10 business days after the date of the notice, or the longer period agreed by the agency and the applicant.

<sup>6</sup> Under the heading *'When is a response required?'*.

<sup>7</sup> Council file notes dated 20 and 25 October 2017.

<sup>8</sup> As above.

<sup>9</sup> Satisfying section 42(1)(c) of the RTI Act.

**Would dealing with the Application substantially and unreasonably divert Council's resources from their use in its functions?**

22. Yes.
23. Sections 41(2) and (3) of the RTI Act set out considerations an agency must have regard to in determining whether dealing with an application would substantially and unreasonably divert the agency's resources from its functions, and those which must be disregarded. Relevantly, an agency:
- (a) **must not** have regard to any reasons the applicant gives for applying for access, or the agency's belief about the applicant's reasons for applying for access<sup>10</sup>
- (b) **must** have regard to the resources that would be used for:
- identifying, locating or collating the documents
  - making copies, or edited copies of any documents
  - deciding whether to give, refuse or defer access to any documents, including resources that would have to be used in examining any documents or conducting third party consultations; or
  - notifying any final decision on the application.<sup>11</sup>
24. There is nothing before me suggesting Council had regard to any reasons the applicant may have given for applying for access to requested information, nor any belief or supposition as to what those reasons may be (and nor, in conducting this review, have I).
25. As for the mandatory considerations listed above, Council's Notice and decision both set out the work estimated to perform relevant tasks. To repeat, Council estimates that there are more than 150 documents within the scope of the Application and that this could amount to thousands of pages. Council further estimates that it would take more than 160 hours or 22 working days to process the Application.
26. There is nothing before me to cause me to doubt Council's estimates, which I accept. Indeed, relevant estimates appear conservative, given that the scope of the Application extends across 20 years and would require searches of various hard copy and electronic systems, including archived information. Council informed OIC during the course of the review that the estimates on which its decision was based did **not** take into account the fact that a Council officer would have to travel to Herberton to manually search for archived documents in the date range of 1997 to 2009.<sup>12</sup>
27. It falls then to consider whether such work would amount to a substantial and unreasonable diversion of resources. Assessing whether the work involved in processing a given application would, if carried out, substantially and unreasonably divert resources is a question of fact to be appraised in each individual case, taking into account a given agency's operations (other than RTI processing) and resources.<sup>13</sup> Neither of the terms 'substantial' or 'unreasonable' are defined in the RTI Act, and are therefore to be accorded their natural meanings.

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<sup>10</sup> Section 41(3) of the RTI Act.

<sup>11</sup> Section 41(2) of the RTI Act. This list is not exhaustive.

<sup>12</sup> Telephone conversation between Council and OIC officers on 22 November 2017. This additional fact was put to the applicant by OIC letter dated 15 January 2018. Council's premises are located in Atherton.

<sup>13</sup> *Davies and Department of Prime Minister and Cabinet* [2012] AICmr 10 (22 February 2012) at [23] and [28].

## Substantial

28. As for the first requirement, I am satisfied that 160-plus hours – or more than 22 business days – would comprise a substantial, or ‘considerable’ and ‘telling’<sup>14</sup> – diversion of Council resources, which are relatively limited in comparison to many other agencies subject to the obligations imposed by the RTI Act. As Council has explained, it has no dedicated RTI officer. Processing the Application would therefore require the officer charged with handling RTI applications to neglect their other duties and responsibilities for in excess of a month. Alternatively, Council would be required to re-direct resources from other operational areas, thereby diverting them from their usual uses for a considerable period of more than 22 days.

## Unreasonable

29. I am also satisfied that the amount of work required to process the Application would be an exorbitant and excessive,<sup>15</sup> and therefore unreasonable, diversion of agency resources.
30. Factors that have been taken into account in determining reasonableness when considering the resourcing burden imposed by an application for information under a general information access scheme are:<sup>16</sup>
- a) whether the terms of the request offers a sufficiently precise description to permit the agency, as a practical matter, to locate the documents sought within a reasonable time and with the exercise of reasonable effort
  - b) the public interest in disclosure of documents relating to the subject matter of the request
  - c) whether the request is a reasonably manageable one, giving due but not conclusive, regard to the size of the agency and the extent of its resources usually available for dealing with access applications
  - d) the agency’s estimate as to the number of documents affected by the request, and by extension the number of pages and the amount of officer time, and the salary cost
  - e) the reasonableness or otherwise of the agency’s initial assessment and whether the applicant has taken a cooperative approach in redrawing the boundaries of the application
  - f) the timelines binding on the agency
  - g) the degree of certainty that can be attached to the estimate that is made as to the documents affected and hours to be consumed; and in that regard, importantly whether there is a real possibility that processing time may exceed to some degree the estimate first made; and
  - h) whether the applicant is a repeat applicant to that agency, and the extent to which the present application may have been adequately met by previous applications to the agency.
31. In the applicant’s favour is the general public interest in disclosure of information concerning maintenance of public infrastructure.<sup>17</sup> The Application was also stated in

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<sup>14</sup> ‘*Substantial*’ is defined as meaning ‘*considerable amount, quantity, size, etc.*: a substantial sum of money’ (Macquarie Dictionary, Fifth Edition) and ‘*of telling effect*: a substantial reform’ (Collins Dictionary, 3<sup>rd</sup> Australian Edition).

<sup>15</sup> ‘*Unreasonable*’ is relevantly defined as meaning ‘*exceeding the bounds of reason; immoderate; exorbitant*’ (Macquarie Dictionary, Fifth Edition) and ‘*immoderate; excessive*: unreasonable demands’ (Collins Dictionary, 3<sup>rd</sup> Australian Edition).

<sup>16</sup> *Smeaton v Victorian WorkCover Authority (General)* [2012] VCAT 1550 (29 October 2012) at [39], adapting the factors listed in *Cianfrano v Premier’s Department* [2006] NSWADT 137 at [62] to [63], the latter recently cited in *Zonneville v Department of Education and Communities* [2016] NSWCATAD 49 at [29]. The factors are not exhaustive.

<sup>17</sup> Matters concerning this issue are particularly emphasised in submissions received from the applicant by OIC on 12 December 2017.

relatively precise terms, although the sheer length of that application largely negates any advantage that might accrue from such specificity, particularly when Council's size and the resources available to it to deal with RTI applications – an officer charged with other duties – are borne in mind.

32. Telling against a finding of reasonableness are:

- the fact that Council has previously endeavoured to address the applicant's concerns about the bridge both by way of face to face meeting and release of relevant documents outside of the RTI process;
- the fact that, at the time Council issued its Notice, it was dealing with two other applications lodged by the applicant, one of which traversed similar territory as the Application;
- the applicant's lack of cooperation with Council in narrowing the Application, as evidenced both by:
  - his indicating in other contexts that he was only interested in documents spanning the periods 2013-14<sup>18</sup> and 2014-15,<sup>19</sup> but nevertheless maintaining the 20-year span of the Application, and
  - his failing to assist Council to identify or eliminate from the scope of the Application documents to which he has already had access, such as by way of Council's discretionary releases of information.<sup>20</sup>

33. Also relevant in assessing reasonableness is, as noted above, the time available to an agency to process requests, and the time anticipated to process a given request. The standard '*processing period*' for making a decision under the RTI Act is 25 business days.<sup>21</sup> In this case, Council required until day 24 of the 25 day processing period just to prepare its detailed estimate and issue the Notice to the applicant. In these circumstances, I consider it is unlikely that Council would have been able finalise a considered decision within the processing period, considering its estimate was that dealing with the Application would require a further 22 business days at the least.

34. Further, as mentioned earlier, I consider there to be a more than reasonable possibility that Council's estimate – which of itself I have, as also noted above, no reason to question and accept as reasonable – would in fact prove conservative were Council required to process the Application to completion. The sheer chronological scope of the Application means that extensive research into and searching of potential storage locations would be likely, given changes in record-keeping systems likely to have occurred over the two decade period the subject of the request. I note again Council's realisation on external review that properly processing the request would entail despatch of an officer to an offsite archive location, work not originally factored in to Council's initial estimates.

35. It is also, as Council submits, quite probable that consultation with third parties named in the Application would be required, given the modest threshold for consultation set by

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<sup>18</sup> Council has supplied me with a file note of a phone call between the applicant and a Council officer on 20 October 2017, following the issuing by Council of the Notice. These notes indicate that the applicant had previously suggested he was only interested in documents across a smaller time period, ie. 2013 -2014.

<sup>19</sup> In an email to OIC dated 11 December 2017, the applicant advised that he was primarily interested in information for the years 2014-2015.

<sup>20</sup> As OIC advised the applicant by letter dated 15 January 2018, as he was given administrative access by Council to documents other than via the Council's RTI Unit, it appears he would be best positioned to liaise with the RTI Unit so as to eliminate materials of this kind, rather than require the RTI Unit to despatch Council-wide requests for information that has already been released to him. His failing to do so suggests a lack of desire to meaningfully consult with Council so as to negotiate a manageable application.

<sup>21</sup> Section 18 of the RTI Act. If an agency needs to consult with a relevant third party, 10 business days will be added to the processing period: section 18(2)(d) of the RTI Act.

section 37 of the RTI Act. Evaluating the precise extent of this consultation would be unknown until all relevant documents were located and assessed. It is reasonable, however, to expect that at least some would be required, further increasing the likelihood that the actual processing time would exceed the estimates relied on by Council in its Notice and decision (even allowing for the additional processing time granted an agency to conduct consultation).<sup>22</sup>

36. Taking all these considerations into account, I am satisfied that the work involved in dealing with the Application would, if carried out, be exorbitant and excessive, and therefore unreasonably divert Council's resources from its functions.

### **Applicant's submissions**

37. The applicant lodged a deal of material during the course of this review, although much of it consists of press clippings<sup>23</sup> or links to internet articles<sup>24</sup> – the contents of which have no bearing on the specific issues I am required to determine – or other material irrelevant to the substantive issues I must assess in this particular matter.<sup>25</sup> His key contention, as I understand, is that Council's estimated processing time is '*far fetched and unreasonable*',<sup>26</sup> as he only applied for information concerning one piece of infrastructure.<sup>27</sup>

38. I have explained above that, assessed objectively, Council's estimates are reasonable and, indeed, understated. The fact an access application targets only one or a limited number of subjects or topics is of no moment in determining whether processing that application would substantially and unreasonably divert agency resources – the pertinent considerations to be taken into account in making the relevant assessment are those itemised in section 41(2) of the RTI Act, which Council has done in this case.

39. As OIC explained to the applicant during the course of the review,<sup>28</sup> an application may substantially and unreasonably divert an agency's resources even if only a small number of documents are ultimately determined to be relevant to the application. This is because the work involved in the agency reaching that point – that is, in discharging its obligation to identify and deal with all relevant documents – may be considerable. Amongst other things, it may involve considerable work ascertaining:

- how documents were stored in different time periods and what systems were used,
- the relevant legislative timeframes for keeping particular records record,
- internal policies for document archiving and destruction,
- who was responsible for the records; and
- what documents have actually been destroyed and whether there are any records of destruction.

40. Such work will almost invariably increase if, as here, an application spans a large timeframe, given the likelihood of changes to record-keeping systems, staff, policies and

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<sup>22</sup> See above.

<sup>23</sup> Contained, for example, in a bundle of material received from the applicant on 12 December 2017.

<sup>24</sup> For example, four emails received by OIC on 15 January 2018.

<sup>25</sup> Much of this material concerns procedural issues, addressed further below, or issues raised by separate external review applications.

<sup>26</sup> Email to Council dated 23 October 2017.

<sup>27</sup> Email to OIC dated 11 December 2017 and telephone call dated 7 December 2017. See also the applicant's email to OIC dated 15 January 2018, reiterating that his request '*almost in its entirety is concerning 2 engineers reports. 1 in 2014 and one in 2015 and associated information for those inspections for 1 piece of TRC infrastructure*'. A cursory review of the terms of the Application discloses, however, a request of much greater breadth, both in terms of subject matter and date range. As noted earlier in these reasons, it was certainly open to the applicant to have narrowed the Application in terms such as those stated in the extract set out above. No such narrowing, however, occurred.

<sup>28</sup> Letter dated 15 January 2018.

even the very technologies by which agency documentation and records are created, maintained and retained.

### **Conclusion**

41. I consider that:

- Council has satisfied the procedural steps set out in section 42 of the RTI Act
- the work involved in dealing with the Application would, if carried out, substantially and unreasonably divert Council's resources from their use in the performance of its functions; and therefore
- Council was entitled to refuse to deal with the Application dated 13 September 2017, under section 41(1)(a) of the RTI Act.

42. Before concluding these reasons, I will deal with procedural concerns raised by the applicant during the course of the review. The applicant took issue with OIC making preliminary enquiries of Council and fielding information and submissions from that agency in the early stages of this review. OIC did no more than exercise the power conferred on the Information Commissioner by the RTI Act to make preliminary inquiries,<sup>29</sup> and to observe the obligation to identify opportunities for early resolution of external reviews.<sup>30</sup> The applicant has been given clear explanations of OIC's procedures and processes,<sup>31</sup> notice of the fact OIC was proposing a decision adverse to his interests,<sup>32</sup> and opportunity to make submissions in reply.

### **Decision**

43. I affirm the decision under review. Council may refuse to deal with the Application, under section 41(1) of the RTI Act.

44. I have made this decision as a delegate of the Information Commissioner, under section 145 of the RTI Act

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**L Lynch**  
**Acting Right to Information Commissioner**

**Date: 15 March 2018**

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<sup>29</sup> Section 98 of the RTI Act.

<sup>30</sup> Section 90 of the RTI Act.

<sup>31</sup> OIC letter dated 15 December 2018.

<sup>32</sup> See particularly our letter to the applicant dated 15 January 2018, conveying a preliminary view on the issues in this review. For completeness, OIC's use of preliminary view letters has been judicially endorsed as procedurally sound: *Community Care Inc v Taylor, Information Commissioner & Ors* [2007] QSC 148 (Helman J).



## APPENDIX A

### Significant procedural steps

Date	Event
13 September 2017	Council received the Application.
18 October 2017	Council issued the Notice.
23 October 2017	Applicant confirmed the original scope of the application with Council.
25 October 2017	Council decided to refuse to deal with the Application, under section 41(1) of the RTI Act.
30 October 2017	OIC received the applicant's application for external review.
1 November 2017	OIC made preliminary inquiries of the Council.
22 November 2017	OIC made preliminary inquiries with Council via telephone.
7 December 2017	OIC discussed the Application with the applicant via telephone, conveying the preliminary view that Council was entitled to refuse to deal with the Application under section 41(1) of the RTI Act.
8 December 2017	OIC wrote to the applicant, confirming OIC's preliminary view.
11 December 2017	OIC received further email submissions from the applicant.
12 December 2017	OIC received additional submissions from the applicant.
14 December 2017	OIC wrote to Council and applicant, advising the application for external review had been accepted.
3 January 2018	OIC received additional submissions from the applicant.
15 January 2018	OIC wrote to the access applicant, conveying the preliminary view that Council was entitled to refuse to deal with the Application under section 41(1) of the RTI Act. The applicant emailed submissions in reply.

## APPENDIX B

### Access application terms

*All documents that involved maintenance scheduling & maintenance, engineers inspections, preparations for inspections, recommended repairs by engineers of Wright's Creek Bridge.*

*These documents should include the following:*

- a) *maintenance schedule documents under both Eacham Shire Council & Tablelands Regional Council and executive management (names of people) in charge of following maintenance schedule and detailed cost to Council of implementing the maintenance of W.C. Bridge*
- b) *All documents of TENDERS rendered and answers received by TRC to procure engineers (PDR, Pitt- and Sherry and other contractors to implement the various inspections and analysis of all structural elements which make up Wright's Creek Bridge. These documents should include the names of all executive managers responsible for decisions on which contracts were approved.*
- c) *Documents should also include proof provided to TRC regarding engineers and other contractors of their certified qualifications to undertake a Level 2 and Level 3 Bridge Inspection in accordance with the "Bridge Inspection Manual" - DMR, Qld (June 2004) issued by the Qld Dept of Transport and Main Roads, Road System and Engineering. Documents should also provide the names of executive management in charge of procuring the proof of engineers qualifications.*
- d) *Documents should include a complete record of the original TRC briefs submitted to the engineers (PDR and Pitt and Sherry) upon their engagement and the names of the executive officers who compiled the briefs.*
- e) *Documents should also include a complete record of the original TRC briefs submitted to all other contractors upon their engagement such as: for scaffolding, steel analysis and measurements, deck repairs and guard rails, welding, etc. These documents should include the names of executive officers who compiled the briefs.*
- f) *Documents should include a record of all TRC personnel included in the inspection process and in implementation of the engineers recommendations to Council, such as the duties and responsibilities of the TRC personnel.*
- g) *According to PDR engineers report TRC advised them that Wright's Creek Bridge was operating under a "rating assessment" of a 6 tonnes limit but PDR goes on to say that quote "However, no record of the load rating assessment was available for PDR Engineers to review..." PDR ref page 7 to Level 2 report. This assumed load rating assessment is also referenced by Pitt & Sherry engineers. Documents are required to show how this information concerning this 6 tonnes rating assessment was conveyed to the engineers and who conveyed it.*
- h) *Documents are required relating to the TRC's officers interactions and decisions to initiate a structural review/engineering inspection of Wright's Creek Bridge. These documents should include any interactions/communications with other entities outside TRC that had input or interest into this review/inspection taking place of W.C. Bridge.*
- i) *Special note*

*All documents that show the cost of any operations undertaken by TRC or Eacham Shire Council for maintenance or implementation of any recommendation provided by any engineers (esp. PDR and Pitt and Sherry) before (under Eacham Shire Council) during and post inspections by PDR and Pitt and Sherry Engineers.*

*All documents that show the cost to TRC for the hire of PDR and Pitt and Sherry Engineers or any Engineers previously involved in maintenance of W.C. Bridge. These documents should have detailed information such as the dates of start and finish of the operation or inspection. The names of the Company responsible for the operation or inspection. The total cost to TRC for the operation or inspection and the names of the TRC officers who made the decisions to hire the various contractors to implement the operations. As an example: the scaffolding erected for Engineers inspections approx Sept or Oct 2015, on W.C.B.*

  1. *The name of the company who erected the scaffolding and if they were the owner of the scaffolding. If not who owned the scaffolding.*
  2. *The date the scaffolding placement commenced*
  3. *The date the scaffolding removal was completed*
  4. *The total cost to TRC to procure the scaffolding*
  5. *Tenders submitted by TRC to various companies and answers received*
  6. *TRC officers in charge of seeking and deciding on placement of scaffolding.*
- j) *P.Script*

*On page 18 of PDR's titled "Options Analysis Report" PDR gives a detailed cost estimate on Table 3-10: Wright's Creek Road Asphalt Removal, at a cost of \$164,890.00 (note: this is an extra cost from bridge demolition). I am requesting documents on who at TRC requested this cost estimate from PDR engineers and why did they request it.*