

The Molpus Woodlands Group, LLC

Molpus sustainably manages approximately 17,000 acres of timberlands in eastern Washington and is troubled by the department's aggressive expansion of the waters it is planning to designate as Tier III waters. Please pause this proposed rulemaking until transparent, objective, and robust analysis is conducted. The public and landowners impacted should have clear and direct information about how the department is making these designations, the costs of designations, and the implications for landowners and local communities. The water quality standards are purportedly already being met in these waters although there is no site-specific data to demonstrate it. In any case, they are already subject to state and federal protection. We understand that the department's Preliminary Regulatory Analyses could not quantify the degree to which designation would improve water quality, increase recreational visits, or increase fish and wildlife populations. This is the first time that the department has designated waters since its rules were adopted 20 years ago. Failure here to identify a quantitative need and identify the cost of designation sets a precedent for overreaching in other waters because its standards for these Tier III designations are vague and subjective. Please postpone any new Tier III water designations until clear transparency has been met.