

Doug Stienbarger

Please postpone Tier III designations.

You need more transparency, given that this is the first time you are designating these waters. There should be a standard, clear, and specific process available to allow meaningful public participation and transparent analysis. You have not shown sufficient water quality data to support either designations or benefits for your proposal. There appear to be significant economic impacts, and you do not make clear the environmental impact on land and shoreline use. The potential restriction of human activities without adequate public and legislative approval troubles me. I urge DOE to pause the rulemaking, while you conduct a thorough and transparent analysis of site-specific data, and consider public input to outline benefits as well as costs.

Your lack of transparency makes it difficult for others to verify and validate your conclusions. It also increases public mistrust in the scientific basis of your proposal and leads to sinister implications about impacts on communities.

You fail to adequately demonstrate the added benefit you claim for this designation. To what degree and how much will this designation surpass current DOE water quality standards and their impacts on water quality, recreation, and fish and wildlife populations?

You do not articulate specific economic impacts, nor how you arrive at those impacts. This includes: economic impacts on adjacent communities; the scope of areas protected (size and location); specific BMPs and their cost. Your lack of specificity significantly undermines your proposal and makes verification difficult.

Your proposal fails to identify either good or bad environmental impacts, even though your proposal will clearly preclude roads and public access, as well as impact forest management, especially for wildfires.

You fail to quantitatively identify both the need for Tier III designation and the cost of designation. Your proposal therefore appears vague and subjective.

DOE's expansion of Tier III designations will prevent activity in large sections of the state's watersheds without adequately articulating how you arrived at your proposal.

As my math and science teachers always told me, "show your work". Without the ability to verify and validate, you subject your agency to claims of overreach and implications of sinister intentions. Clearly show me and other citizens why we should give up what you ask for.