

Double O Ranch

Please halt this rulemaking until Ecology has established a high standard for designations which will have significant economic impacts that have not been disclosed. Ecology's Tier III rulemaking acknowledges that Tier III designation would significantly impact current and future human activities adjacent to protected waters in public spaces, potentially preventing public use and access for recreation or other uses. Ecology also acknowledges that Tier III protection potentially has major implications on the economies of the state, acknowledging that designation will prevent large-scale development and may increase costs for small-scale development. But Ecology's Regulatory Analyses does not discuss economic impacts on adjacent communities of permanent protection. It does not acknowledge the square miles affected. Ecology will require activities to use "all applicable structural and nonstructural best management practices," but has not identified what those are or what they will cost.