

Saxton's Timber Farm and Sanctuary, LLC

Ecology's action would be unprecedented and poorly defined.

This is the first time Ecology 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. This is mainly a concern because Ecology's standards for designating waters as Tier III are vague and subjective.