

## Chris Hitchcock

The proposed amendments to the Rules of Practice and Procedure appear to be designed to grant more authority for the Executive Director to make decisions unilaterally and to make the DRBC's decision-making process less transparent. As a member of the public who is interested in the important decisions made by the DRBC, I strongly oppose these amendments.

The grant of expanded authority for the Executive Director to determine: whether a change to a project is material; the information required to be in an application and when an application is complete; and the ability to extend some permits for as many as 5 years, is simply too broad. These are important decisions that should be decided publicly with input from the Commissioners.

In the same vein, the Executive Director should not be empowered to extend permits unilaterally. The extensions of permits and the reasons for doing so should be debated openly.

The Executive Director also should not be vested with the authority to determine whether a project has been sufficiently invested in. Again, this is an important decision that should require the input of Commissioners in an open forum.

The definition of material as proposed in the amendments is subjective and value-loaded. The definition should be clear and state an objective standard.

Lastly, the attempt to remove the federal Freedom of Information Act from the rules is again an obvious attempt to prevent the public from learning about decisions made by the DRBC and the reasons for those decisions. Again, the decisions and process for reaching decisions should be public and open to scrutiny.

For these reasons the Commissioners should not move forward with the proposed amendments.