

Marya Bradley

I am writing to express my strong opposition to the proposed change to the rule-making process. The proposal is alarming in its high-handed concentration of power in the Executive Director of the DRBC and its elision of the public in highly consequential decisions regarding the fate of the watershed, the River and its many tributaries, the environment, the health of the communities and the habitat and survival of wildlife. The proposal is undemocratic and inimical to transparency and public access to information critical to public oversight of the decisions made and the decision-maker and the processes whereby the decisions were made. This is not acceptable and is not in the interest of the public, the water, the future. I am very concerned by and opposed to the consolidation of power in the hands of the Executive Director and the secrecy of decisions made not only excluding the public but even members of the Commission Board. There is, as well, a devious obfuscation in the use of terms, such as whether a change is "material" or not, which avoids oversight and prevents any kind of transparency. Decisions about projects, proposed changes in a project, about permits and extensions of permits must not be made without informing the public and without adequate time for public questions and comments and subsequently for a public review of any revisions resulting from that process. This is imperative, since the matter of clean water and air and soil is critical to the health of human communities and of the environment as well as of the many species who rely on clean water for their habitat and survival. I strongly urge you to reject this nefariously undemocratic and unscientifically based "stream-lining" of the rule-making process and protocols; it is in essence a dangerous consolidation of power in the Executive Director without oversight or recourse for the stakeholders thereby affected. Finally, I am alarmed by the failure to include any references to the federal Freedom of Information Act in the proposed changes to the rules, and instead, the proposed alternative DRBC system that fails to address many critical aspects of transparency and accountability and accords too much power in the hands of the Executive Director. It is utterly unacceptable that whether a matter is "in the public interest" be up to the sole discretion of the Executive Director; this makes a mockery of transparency and democracy: the members of the whole DRBC must make the determination together and their decisions and the bases of their decisions must be readily available to the public and public scrutiny, with possible recourse by the public to challenge the decisions thereby made. The DRBC must provide a reliable and prescribed public access system that is clear, accessible and affordable to assure public access to public records. I call on you to reject this rule-making proposal as an affront to the public and to democracy and the future generations whose interests will not be served by such a consolidation of power and occlusion of the voice of all the stake-holders.