

Delaware-Otsego Audubon Soc.

I am writing on behalf of our organization, with over 300 members including many within our Chapter area within the Delaware River watershed. We are concerned over this proposed rulemaking and the reduced public involvement and transparency it will bring.

We have commented previously on a number of proposals and applications before the Commission. These matters have had the potential to impact water quality, public health, and wildlife throughout the watershed. It was important that we and others were able to fully participate in these proceedings, as is required by law. The more public input that the Commission receives, the better its decisions will be and more reflective of the concerns and effects of the public.

This proposal will significantly reduce this critical part of the review process and insulate the Commission from the very citizens its decisions most affect. It is undemocratic at its heart and contrary to the body's claimed spirit of collaboration.

The Commission's primer document states: "The DRBC recognizes the value of working with its partners in government, as well as with Basin stakeholders and the general public." The proposed rulemaking lessens the involvement of these stakeholders and general public and calls into question the Commission's recognition of the value of these participants.

We urge that this rulemaking proposal be rejected, and that the Commission fully embrace public participation in its activities.