

## Karen Feridun

Thank you so much. My name is Karen Feridun, I'm the founder of Berk's Gas Truth. Under Public Access to Records and Information, the summary of proposed amendments states that gendered pronouns will be removed. A few paragraphs earlier under amendments to 401.41, the draft says specifically the Executive Director must grant the extension if he or she determines. That should be corrected.

But my more substantive comment is also related to 401.41 in part A that discusses extension by Executive Director. By my reading, and I too like others have found the changes to be confusing, the public is pretty much cut out of the process of extending approvals. The section gives Mr. Tambini authority to extend approvals on projects as long as certain criteria have been met. That include terms like very subjective words, arbitrary terms like \$1,000,000 signifying a substantial expenditure.

If the criteria have been met in Mr. Tambini's view, then he can extend the approval. I don't see an opportunity for the public to know that the project is up for consideration or to comment on whether or not the extension should be granted. Something important is missing from the list of criteria. Basically, the criteria say that changes must not have been made to the project, to the project site, or the Commission's Compact in addition to money spent. But that doesn't really include things that have occurred since the initial approval that are in the real world.

Climate change is the obvious example. Top climate scientists have said that the rapid acceleration and intensification of climate change is something that they didn't anticipate. Would the Commissioners have approved a project that would have climate impacts or be especially vulnerable to climate impacts had they known what we all know now. Changes like that should be taken into account when an extension is considered and it shouldn't be up to one person to consider or even know what all the changes might have occurred that would affect an extension. It's one of the reasons why we have commissions with multiple members. It's also one of the reasons why we have a public participation process.

The first opportunity I see for the public to engage is when Mr. Tambini reports to the Commission the extensions he's approved the draft refers to subpart F, which is actually in a different section and seems to be specific to hearings, where it says that any participant in a hearing can appeal an approval in a federal court, something that isn't an option for many individuals or even small organizations. Any changes to the Commission's practices and procedures should ensure more transparency and more opportunities for the public to engage, not fewer. I encourage you to rethink these proposed rule changes. Thank you.