

## Dale Anderson

I would like to request additional information, particularly redline/strikeout versions, related to the revisions to Fact Sheets 12 and 13, and any existing information for the rationale for revisions.

Regarding the comment process, I would like to note that I called to obtain additional information, since the revisions being made to Guidelines 12 and 13 were not identified in the documents that were posted for review and comment. The staff person I talked to was friendly and courteous, answered all my questions to the extent possible in light of the public comment process, and noted the information I was seeking was available but I would need to request it through the comment process. Staff also noted there was no intent to withhold information, rather it was just an internal decision about how much information to provide.

My understanding of the response was that there was internal discussion about providing redline/strikeout versions, and the decision/rationale was not to include them for several reasons: to avoid overwhelming people with information; those with particular interest could request additional information and it would be provided; the redline/strikeout versions would be available to the public at the WWAB meeting, and the Department is not required to provide that information for revisions to Fact Sheets (underlying process for Fact Sheet revisions differ from those for rule changes).

While these are all valid points or perspectives, I would offer for consideration that if the intent is to inform the public of revisions to documents and provide an opportunity for comment, the simplest, most effective, and most efficient way to do that is to provide a version of the document that identifies what the revisions are, so the regulated community can tell whether or not they may have comments or questions about the changes.

Related to the observation from staff that redline/strikeout versions would be available for review at the WWAB meeting - this really does not provide any time for meaningful review and comment if desired, if that is the real intent of the public comment period. Also, the possibility exists that an individual may not be able to attend the WWAB meeting to see the redline/strikeout versions, but could still comment if they were made available prior to that time.

Last, in light of Governor Gordon's desire for greater transparency in government, it would seem that the relatively small effort to post the redline/strikeout versions would contribute to greater transparency, with fairly minimal additional effort needed to post the redline/strikeout versions, since my understanding is that they already exist.

Thank you for the opportunity to review and comment on the proposed revisions to the fact sheets.