



**LEAGUE OF WOMEN VOTERS
OF TENNESSEE**

November 23, 2018

Brian Clifford
Office of General Counsel
Tennessee Department of Environment and Conservation
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 2nd Floor
Nashville, Tennessee 37243

Dear Mr. Clifford,

The League of Women Voters of Tennessee is gratified that Governor-Elect Bill Lee is placing a high priority on maintaining a transparent and open government in Tennessee during his administration. As part of the overhaul of Tennessee's open records act, he has stated his intent to reduce the number of exemptions and expand access to public documents and meetings.

In light of this commitment, we strongly urge the Tennessee Department of Environment and Conservation to postpone the hearing currently scheduled for Wednesday, November 29, 2018 that would consider significant amendments to Chapter 0400-01-01, the Department's rules governing access to public records. Furthermore, given the importance of public input from individuals and organizations impacted by their actions, we strongly urge the deadline to provide written comment on the rulemaking be extended until January 2019.

The League of Women Voters actively advocates for citizen engagement in government. As proposed, the changes in Chapter 0400-01-01 would stifle input since it would require requestors to "vet" their requests with TDEC staff before submitting them. This proposal would give the agency the option of rejecting a request under the pretense of requiring "sufficient detail" to find responsive records.

Thank you for your assistance in creating standards of transparency and accessibility to government that all Tennesseans need.

Sincerely,

Marian T. Ott, President
League of Women Voters of Tennessee

Debby Gould, Vice President