

Commissioner:

As I mentioned at last Monday's quarterly briefing meeting, it is vital that your Permit Efficiency Task Force grapple with two key underlying flaws in the current permit process. These flaws are the primary causes of delay, inefficiency, errors, public opposition, and failure to adequately protect natural resources:

- 1) substantive integration through site wide resource characterization, environmental assessment, and site wide permitting as per the legislative provisions of the Highlands Act; and
- 2) enhanced transparency, disclosure and public participation in permitting - particularly with respect to disclosure of pre-application meetings and other communications with applicants and the regulated community.

I just reviewed the 7/2/08 draft recommendations of the Land Use Committee and am extremely disappointed to note the total failure to engage these two critical issues, while at the same time seeking to narrow OPRA and otherwise compromise environmental protections.

[http://nj.gov/dep/permittf/docs/permit\\_tf\\_landuse\\_recommendations\\_20080702\\_draft.pdf](http://nj.gov/dep/permittf/docs/permit_tf_landuse_recommendations_20080702_draft.pdf)

I urge you immediate attention to this matter and look forward to your timely and favorable written response to this request.

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