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Your proposals consolidate the power of decisionmaking over the lives of millions of people into an even tinier number of individuals, when you should be doing the opposite: democratizing decisionmaking and making it more transparent to the millions of lives you are impacting. I find your direction egregious. My read-through is that you are clearly getting even more autocratic in order to keep secretive power for the most powerful corporate stakeholders, and cut-out the public, which is clearly a way to harm the public interest.

Here are a few of my specific objections and reasons:

In your proposal, the Executive Director is given far too much authority over many crucial decisions and these are made behind closed doors, without the public and without a vote by the DRBC Commissioners. These include: the power to decide whether or not a change to a project is "material" (if it is "materials" it would open up for more robust review); and decisions about the submission of applications for projects, what is required in an application and when an application is complete; the extension for some permits for as many as 5 additional years.

You're trying to grant yourself the power to extend permits virtually unilaterally, so that a single permit given once can mutate for years and years without public input. This is really sickening that DRBC would attempt this coup over the public. Extension of Permits without an expiration date are given favored status, such as the Gibbstown LNG Export terminal docket. The Executive Director -- with no regular and ongoing accountability to the millions of members of the public whose lives and children he is impacting -- is being invested with exclusive authority regarding extension of permits that removes public input completely and relieves the Commissioners of their responsibility to review and approve extensions. This legitimizes the behind-the-scenes decision making that undermines government accountability and public trust.

The bar is WAY too low for the sufficient investment hurdler. It's a joke for the powerful corporate interests that you're waiving in for nothing. \$1M is set as a "minimum" amount expended to decide if a project has been sufficiently invested in, and even that value can be disregarded under certain circumstances. No foundation is provided for this amount and no substantive explanation of what "substantial funds in relation to a project" really means. And, the Executive Director has the power to decide if the amount expended is substantial.

The proposed rules are allowing the sponsors of a project to claim that litigation by opposing parties is an excuse that can be used to explain why they haven't built or spent sufficient funds on a project that they want extended. This is the most crass and authoritarian angle to "blame the victim." You would be punishing the aggrieved party, which is normally THE PUBLIC, for filing suit. This is truly a sickening play by DRBC.

You accept no accountability by adding the words "Material Change" and "Materially" throughout the proposed rulemaking – with NO clear definition or quantification of what Material qualifies as. So, DRBC can define it however it wants in order to advance it's heavily corporate agenda. Your whole new rule system is an authoritarian power play against millions of members of the public whom you should be representing, rather than kicking into the gutter. This terminology is not easily

understandable and clouds objectivity in decisionmaking.

An abusive power-grab, you at DRBC want to remove all references to the federal Freedom of Information Act from its rules and is setting up an alternative DRBC-centric system that leaves many aspects unaddressed or in the hands of the Executive Director. Total concentration of power and free from the public's scrutiny. The most anti-democratic, anti-people provision of them all? You should be ashamed. How can you look at your children in the eyes. Under your authoritarianism, you want to refuse public review of forms, reason for denial, and how costs will be assessed fairly, including if a waiver of fees can be requested like other agencies allow. The DRBC must provide a prescribed public access system that is clear, user-friendly, and affordable to assure public access to public records. The public needs something concrete to rely on. And it's proposed that the Executive Director determines whether or not to disclose requested information, deciding unilaterally if a disclosure is in the public interest! This invests unfair control over the information in an administrator who may not even be qualified to make such legally important decisions. The public needs to take part in DRBC decisions but without access to information, we can't do that effectively. Information is power and we have a right to it!

Your proposals are breaking the public's contract with government. It's an absolute outrageous disgrace and you should be ashamed and disgusted by your actions in proposing this. Stop trying to do an end-around millions of people whose health, lives and livelihood depend on a fair, transparent and more democratic DRBC, not a more authoritarian one. We've fought wars to prevent what you're doing, so don't bring your authoritarian war to us now.