

## Diana Dakey

I was disturbed by the way in which the Delaware River Basin Commission in 2022 granted a three-year permit-authorization extension to Delaware River Partners; Gibbstown Logistics Center Dock 2 project, Docket No.D-2017-009-2. There was limited public disclosure and overreliance on Executive Director decision-making. The rushed extension took place despite the project having been controversial and opposed for many years. The Executive Director determination that substantial funds had been expended was not independently vetted.

I am now disturbed to see that proposed changes to the Rules of Practice and Procedure have not improved upon public disclosure and public input, but, rather, have codified a streamline process that, again, sidelines the public, putting extension decisions in the hands of the Executive Director. I ask that these draft rules be revised to strengthen public disclosure and input.

1. Treat all extension requests the same as new (reapplied) applications. This will avoid controversy over the need for the Executive Director to make judgement calls as to whether there has been "material" modifications with respect to the Comprehensive Plan, and whether there has been expenditure of "substantial" funds.

2. A public hearing should be scheduled for every permit extension because environmental (both natural and built) characteristics surrounding the site continuously change. Realize that upon receipt of an extension request, the original permit is approaching three years of elapsed time and an extension will add another three years. In six years, there could be population shifts, changes to air and water quality, as well as other local and wide-area impacts of the project that were not considered to impact the Comprehensive Plan, because they did not exist or were unknown at the time of initial project authorization.