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The proposed amendments must be governed by the principles of transparency, accountability, and environmental protection. Specifically proposed changes that allow for decisions to be made entirely by the Executive Director, and without public input are inappropriate. All matters of importance must be decided through an accountable manner involving public input. Similarly, proposed changes that allow the executive director to be the sole decision-maker regarding extensions of permits are also inappropriately unaccountable.

Other concerns involve provisions that allow proposers to claim exemptions or extensions based on litigation from opposing parties. These changes would intimidate potential opponents and stifle legitimate opposition to project.

The extensive use of the term "material" to describe proposed changes is yet another major concern. The absence of a clear definition of the term "material" leaves far too much discretion at the hands of the director, who might use associated ambiguity to downplay fairly serious concerns.

Finally, the removal of references to the Federal Freedom of Information Act in favor of internal rules is a step away from transparency and accountability. The public requires access to information. Any changes that explicitly or implicitly limit the FOIA requirements must be removed from any planned changes.