SEPTEMBER 28 CONSULTANTS STAKEHOLDER MEETING TAKEAWAYS

Governance
- Core issue is lack of consistency and responsiveness among District Coordinators and administrative staff, and in particular the DC's "completeness" determination and timeline. This is not adequately addressed in the current draft.
    - They key immediate need is improved and more consistent oversight by NRB staff, for example making sure documents are reviewed in central office before being sent out by a DC, and a clear procedural rulebook/guidance that is consistently and efficiently utilized. The NRB would have a real program and behave more like other permitting agencies.
    - This should include clear standards on what constitutes a complete application
    - Procedural rules should be transparent and public.
    - NRB structural reforms do not get at it – it's about improving implementation not broad policy oversight.   If structural reforms are contemplated, there needs to be more understanding of what exactly NRB would be doing.
    - Resourcing also does not get at it – NRB could be more efficient with existing staff if there were more effective implementation oversight. More resourcing probably won't hurt but NRB might also just increase workload to justify it.
    - They are doubtful it is necessary to have a new structure or staffing to make real improvements in the process.
- Other simple improvements
    - Reinstate the allowance of administrative amendments for simple projects
    - Look at whether permit amendments are actually necessary for simple changes to permitting projects (e.g. adding a shed)

Jurisdiction
- Tier 1
    - Ensure tiers are consistent with existing ACCD regulations – don't set up another system, an additional layer of review, or require already-approved towns to apply again
    - Tier 1 language should not cherry pick "floodplains"
    - Appeals of designation status should not be allowed years later. Once designation has been reviewed/approved, it should be considered final.
- Tier 2
    - Support for exempting everything in 2A
- Tier 3
    - The only feature that may need more protection on is forest blocks. Otherwise we protect natural resources in a complete and comprehensive way through existing regs (in particular wetlands)
    - Don't lower elevation to 2000 feet. Would clog the system due to lots of settlement activity at those elevations.
    - Support for improved mapping to realistically reflect important areas, ideally before the forest criterion comes into force.

- Mapping should include sand, gravel, and bedrock resources, and indicate where temporary impacts could be allowable with conditions.
- Mixed opinions though some concerns on road rule as an interim measure. It could be overinclusive by including reclaimed meadowland.
- The forest fragmentation criterion (if adopted) should allow for mitigation by paying into a conservation fund or conserving other areas.