



MARITIME EXCHANGE

for the Delaware River and Bay

Leading the Way to Port Progress

John T. Reynolds, Chairman
Uwe Schulz, Vice Chairman
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Dennis Rochford, President
Lisa B. Himber, Vice President
A. Robert Degen, Esq., Secretary/Solicitor

Submitted via www.nj.gov/dep/rules/comments

March 29, 2021

Alice A. Previte, Esq.
Attn: DEP Docket No. 02-21-01
Office of Legal Affairs
New Jersey Department of Environmental Protection
401 East State Street, 7th Floor
Mail Code 401-04L
PO Box 402
Trenton, NJ 08625-0402

Re: Proposed Rules N.J.A.C. 7:27-17.10 and 22.36

Dear Ms. Previte:

The Maritime Exchange for the Delaware River and Bay respectfully requests you extend the rulemaking process for the above-referenced rules for 90 days. For your information, the Maritime Exchange is a nonprofit association representing nearly 300 members of the tristate maritime industry, many of whom will be substantially affected by the proposed rules should they go into effect.

Exchange members would like additional time to fully consider the implications of the proposal, which are far greater in scope and complexity than the Department may realize. We are concerned that promulgating a new rule too quickly may result in the neglect of maritime-specific considerations.

Thank you for your consideration of this request.

Sincerely,

Dennis Rochford
President