

Local Review Officer Program
Implementation Challenges

CMP Policy and Implementation Committee
November 20, 2026

Presentation Outline

- **CMP alternative local permitting programs**
  - Summary of programs certified by the Commission
- **Implementation challenges and recommended actions**
- **Process for revocation, suspension or modification of certified ordinances**
- **Next steps**

Alternative Local Permitting Programs

1987 CMP Amendments

- Established an optional streamlined municipal review process for individual single-family dwelling applications.
- Allowed designated local officials (LROs) to determine application completeness (without a Certificate of Filing) and CMP compliance, subject to Commission oversight.

1995 CMP Amendments

- Established a broader framework for alternative local permitting programs.
- Allowed certified municipalities and counties to assume additional application review responsibilities beyond single family dwellings, subject to Commission certification and oversight.

Alternative Local Permitting Programs

Purpose (*N.J.A.C. 7:50-3.81, 3.82*)

- Intended to simplify and expedite development review.
- Allows municipalities to establish application processing and review procedures that differ from typical CMP development review requirements.
- May authorize local application filing, completeness determinations, and approvals without direct Commission review.
- Ordinances establishing such programs must be reviewed and certified by the Commission.

Alternative Local Permitting Programs

Standards for Certification

(N.J.A.C. 7:50-3.83)

- Demonstrated local administrative capacity and qualified personnel.
- Continued compliance with applicable CMP environmental and land use standards.
- Commission retains exclusive authority over Waivers of Strict Compliance.
- Adequate safeguards for Commission oversight or periodic review of local permitting decisions.

Alternative Local Permitting Programs

Monitoring and Enforcement

(N.J.A.C. 7:50-3.84, 3.85)

- Commission monitors implementation and compliance with certification standards.
- Executive Director may recommend program modification, suspension, or revocation.
- Standard Commission development review procedures may be reinstated.
- Suspension or revocation does not automatically affect certification of underlying municipal land use ordinances.

Certified Programs

- 21 municipalities have had a certified program.
- 19 were certified 25+ years ago (1993-2003).
- 14 programs are currently active; 7 others have been voluntarily suspended or repealed locally.
- All the programs follow a similar review process and resemble the original LRO provisions established in the 1987 CMP amendments.

Active LRO Programs

Municipality	Certification Date
Barnegat Township	10/11/1996
Bass River Township	04/12/2019
Buena Borough	05/18/1999
Dennis Township	04/10/1997
Estell Manor City	10/07/1999
Hammonton Town	12/08/1995
Jackson Township	06/12/1998
Medford Township	11/12/2010
Stafford Township	10/1/1993
Tabernacle Township	09/12/1996
Washington Township	12/13/1996
Waterford Township	06/14/1996
Winslow Township	12/08/1995
Woodbine Borough	04/10/1997

Certified LRO Program Review Process

1



Application Submitted

Applicant submits SFDU application and supporting information directly to the municipal LRO without a CF.

2



LRO Reviews Application

LRO evaluates lot size, density, and environmental standards using Commission-provided tools.

3



PZP Submitted to the Commission

LRO forwards complete application, supporting materials, and signed PZP to Commission staff if it is deemed consistent.

4



Commission Review of PZP

Staff verifies completeness and CMP compliance and co-signs PZP, which is valid for two years.

5



Final Local Permits and Approvals

Applicant obtains all other local permits and approvals and submits them to the Commission for review.

6

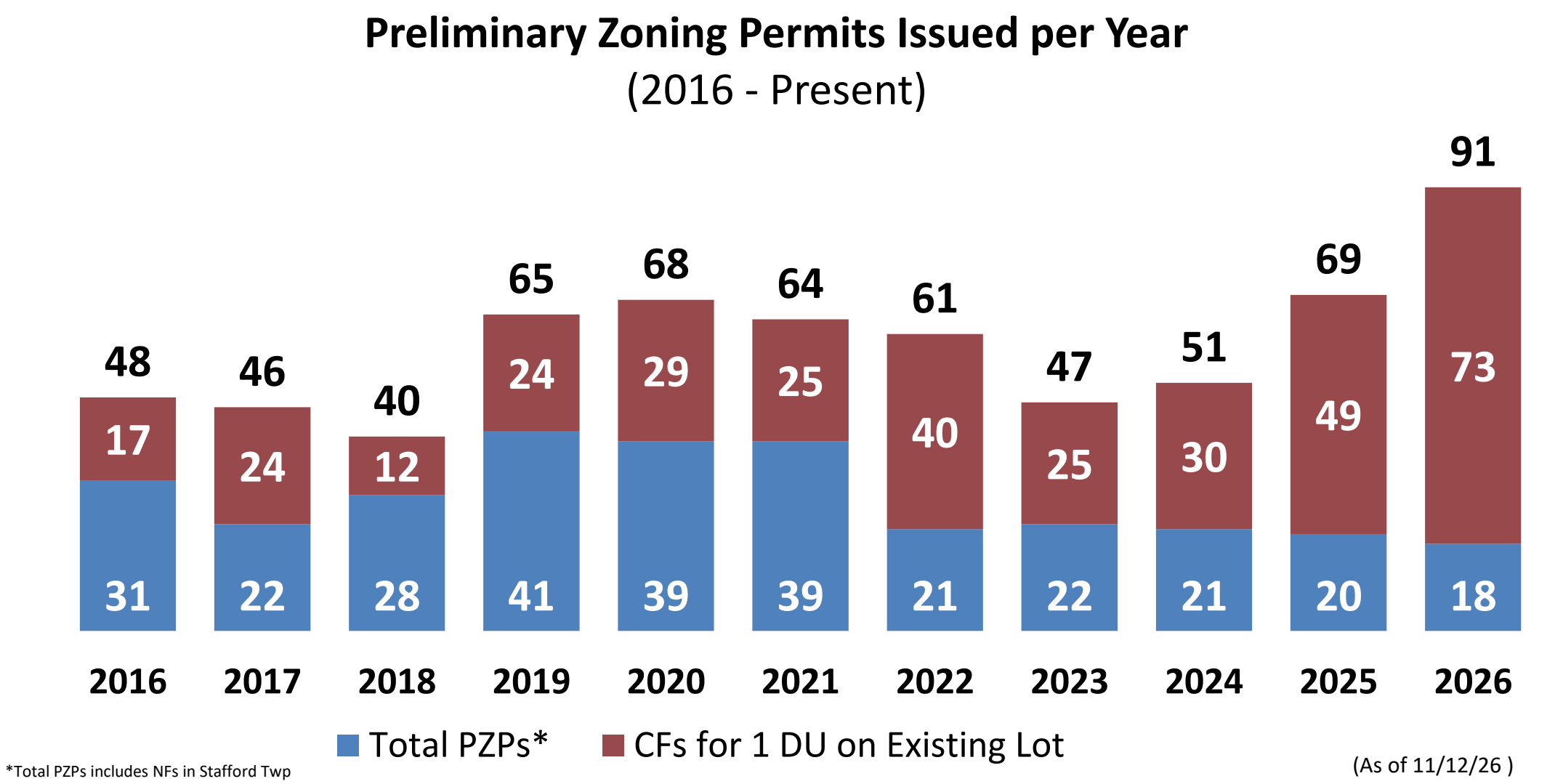


Commission Review of Final Local Permits and Approvals

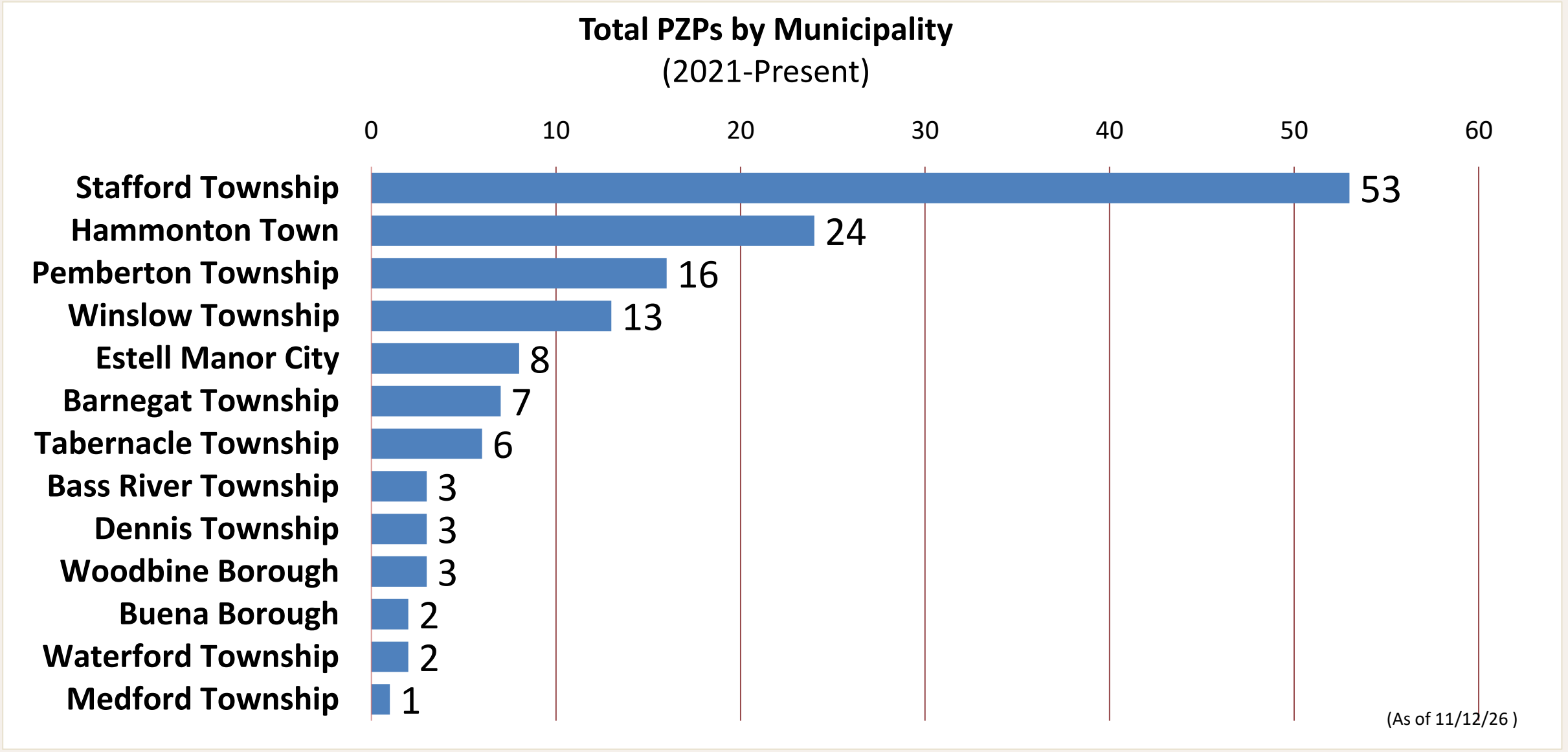
Staff reviews submitted approvals and determines whether the permit or approval can take effect.

PZP = Preliminary Zoning Permit

Certified LRO Program: Annual Activity



Certified LRO Program: Annual Activity



Challenges: Initial Application Submission

1



Application Submitted

Applicant submits SFDU application and supporting information directly to the municipal LRO without a CF.

Issue
Application Submitted to Commission Instead of LRO

Fee Refund

Resubmission to LRO

Result
Extended Application Processing Time

Challenges: LRO Review

2

LRO Reviews Application

LRO evaluates lot size, density, and environmental standards using Commission-provided tools

Issue
Limited Availability or Capabilities of LRO

Inconsistent or Incomplete LRO Guidance to Applicant

Additional Questions to Commission Staff

Result
Extended Application Processing Time & Increased Commission Staff Involvement

Challenges: PZP Application Submission

3



PZP Submitted to the Commission

LRO forwards complete application, supporting materials, and signed PZP to Commission staff if it is deemed consistent.

Issue
Incomplete PZP Application Submitted

Incomplete or Inconsistent Application

Additional Commission Staff Review

Result
Extended Application Processing Time & Additional Commission Staff Letters

Challenges: PZP Submission

4



Commission Review of PZP

Staff verifies completeness and CMP compliance and co-signs PZP, which is valid for two years.

Issue
Incomplete PZP Document Submitted

Additional Commission Staff Review

Commission Staff Revisions to PZP Document

Result
Extended Application Processing Time & Additional Commission Staff Letters

Challenges: Permit/Approval Submission

5

Final Local Permits and Approvals

Applicant obtains all other local permits and approvals and submits them to the Commission for review.

Issue
Unfamiliarity of LRO with PZP Conditions

Additional Questions to Commission Staff

Additional Commission Review Letters

Result
Extended Application Processing Time & Increased Commission Staff Involvement

Challenges: Permit & Approval Review

6



Commission Review of Final Local Permits and Approvals

Staff reviews submitted approvals and determines whether the permit or approval can take effect.

Issue

Permits and Approvals Not Submitted to Commission

Inability to confirm PZP conditions met

Additional Commission Staff Involvement & Letters

Result

Extended Application Processing Time & Increased Commission Staff Involvement

Staff Recommendation

Suspension and Revocation of 21 Certified LRO Programs

Inadequate Applicant Support

- Limited LRO Staff Availability
- Conflicting or incomplete guidance
- Applicant frustration & confusion

Increased Staff Workload
(No Application Review Fee)

- Additional Applicant & LRO Questions
- Additional Staff Review & Letters
- Increased PZP Document Revisions

Application Delays

- Process Not Streamlined
- Not Meeting 14-day Timeframe
- Extended Review & Processing Times

Administrative Issues

- Incomplete/Inconsistent submissions
- Limited Capabilities of LRO Staff
- Duplicative review and processing



Process for Suspension and Revocation

- The ED can recommend revocation, suspension, or modification of an alternative permitting program if one or more certification standards are not being adequately met. (*N.J.A.C. 7:50-3.85*)

- General CMP process for modification or revocation of a certified ordinance is to be followed.
  (Subch. 3, Part VI)

- The revocation, suspension or modification of an alternative permitting program does not affect the certification status of the remainder of the municipality's certified ordinances. (*N.J.A.C. 7:50-3.85*)

Process for Suspension and Revocation

- ED notifies the Commission of determination. Upon concurrence of the Commission, proceedings are initiated.
- A Public hearing is scheduled, noticed and held.
- Within 45 days after hearing, the ED submits report to the Commission with findings, conclusion and final recommendation.
- The Commission acts:
  - revoke or suspend certification;
  - modify a certification to impose conditions; or
  - take any other action necessary to ensure local cooperation in the implementation of the CMP.
- A municipality must respond to an order, as necessary, within 120 days.

Next Steps

- Staff memo to Pinelands Commission seeking concurrence to proceed. (December meeting)
- Conduct outreach to existing municipalities with active LRO Programs to provide advance notice of intent to suspend the programs. (~December/January)
- Schedule and hold a public hearing. (~January/February)
- Resolution and report to the P&I Committee. (~February)
- Resolution and report to the Pinelands Commission. (~March)