Feedback to NJDEP on Reducing Carbon Emissions in NJ
(Email should use subject line: Reducing Carbon Emissions in NJ)

1. NJ must not allow building of any new gas fired power plants or other gas infrastructure.
Given the intense focus on reducing CO2, NJ must first take steps to ensure the problem does not become worse by not allowing increased burning of natural gas.

2. NJDEP should consider the rate of change of technology when making short term decisions. It is risky to make changes in short term investments without considering the long term implications. When technology is not evolving quickly it is not risky to make short term investments as nothing much will change to cause this to be outdated. When technology is evolving quickly (as solar and storage and other energy technologies are today) it is necessary to consider the long term or risk ending up with stranded investments.

It is dangerous to make short term changes such as converting from one fuel source to another without looking at long term implications. One critical issue in this area is facilitating or encouraging conversion from oil to gas in buildings and residences. We now know that gas is just about, if not worse than, coal because of methane leaks so it is not a benefit to the environment. Furthermore, if a business or residence spends the money now to do this conversion they are much less likely to be willing to spend money in the next few years to convert to a heat pump, which is the ultimate goal. All investment decisions must be based on maximizing GHG reductions over the next 20 to 30 years.

NJ should make all decisions on electric energy based on a long term goal of getting electric production to net zero carbon by around 2030 in support of the IPCC goal of a 45% total GHG reduction by 2030.

3. It is imperative that NJDEP begin efforts to reduce methane as quickly as possible.
This effort does not currently include efforts to reduce methane. It was stated that this would be addressed in six months. Time is not on our side. This must be a priority as reducing methane is 86 times more effective in reducing global temperatures than reducing CO2.
Therefore, every molecule of methane prevented from entering the atmosphere is 86 times more effective in reducing the impact of climate change than that of a CO2 molecule.

4. NJDEP identified increased sequestration as a strategy for reducing CO2. While this stakeholder session did not address land use, it must be pointed out that current NJDEP forestry plans to log NJ public forests are both increasing CO2 and reducing future sequestration. This must be stopped. These land use emissions are particularly important as the DEP has long been estimating that forests will absorb about 8MMT of GHG per year and this assumption must be validated in light of current logging and deforestation programs. Overall, New Jersey has 350,000 acres of forest managed by

the state. The NJDEP Fish and Wildlife plan is to log 10% of this area, which would increase GHGs by 472,500 metric tons and decrease future sequestration by a roughly equivalent amount each year. This logging program is only one piece of the total land use issue. Every year many acres of trees are lost to normal development. Thus the validity of the 8MMT/year value for land sequestration is very suspect and the methodology and associated measurements and estimates that go into this value must be made public.

5. NJDEP and BPU should focus on supporting municipal efforts to reduce CO2. NJDEP and BPU should increase efforts to have municipalities lead on reducing energy use and increasing the percentage of their power from renewable energy technologies. Municipalities can also drive increases in the use of renewable energy on the part of their residents and commercial businesses through energy aggregation, municipal solar programs and other programs currently sponsored by Sustainable Jersey. This would reduce energy demands on the grid, reduce GHGs and does not require any new regulations. All it takes is education and convincing evidence that municipalities and their residents will save money by participating. NJ must also have an incentive program to get commercial and residential users to convert to ground source heat pumps. NJDEP should consider municipal actions the lowest hanging fruit in all its opportunities to reduce GHG emissions.

6. In addition to other metrics NJ must look at tons/year of GHGs.

7. Reducing power demand must be a key focus. It is equally if not more important to focus on reducing power demand than sources of new energy as this will naturally stop development of new fossil fuel projects while saving everyone money.

8. NJDEP must use its ability to regulate ozone and NOx credits to reduce CO2. NJDEP must stop allowing EGU applicants to purchase ozone or NOx credits as this makes it easy for them to get approved while making already poor air quality worse. Stopping this practice is a viable means for stopping new gas fired power plants without having to incur political heat for approving or not approving permit applications. New Jersey DEP regulators are sticking their heads in the sand on new gas plants. They refuse to consider their potential impact on GHGs until they are built and in operation. Once in operation they will destroy DEP's ability to meet GWRA mandated targets. Denying ozone/NOx permits is a good way to avoid this problem. Other rules changes such as including air deposition results in permit approvals and tightening floodwater and wetlands regulations, can produce similar benefits.

9. NJDEP must consider the long term costs of climate change to the state and society when making decisions on cutting GHGs. Every analysis shows that these long term costs far outweigh short term increases in costs to take preventive measures. Many costs to convert to renewable energy are actually investments with positive paybacks, not just additional payments that have no benefit to consumers.

10. Off-shore carbon storage and CO2 separating power plants as tools for reducing CO2. DEP should evaluate the cost of these options against the costs associated with policies and practices that reduce CO2 emissions, making it unnecessary to deal with these approaches to capturing and dealing with CO2.

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