



STATEMENT

**Comments
2011 Draft Energy Master Plan**

August 11, 2011

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Evelyn Dowling
NJBPU Office of Communications
44 South Clinton Avenue, PO Box 350
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Dear Ms. Dowling:

New Jersey Future is a nonprofit, nonpartisan organization that employs original research, analysis and advocacy to build coalitions and drive land-use policies that help revitalize cities and towns, protect natural lands and farms, provide more transportation choices beyond cars, expand access to safe and affordable neighborhoods and fuel a prosperous economy.

With this perspective, we offer New Jersey Future's comments on the revised 2011 draft Energy Master Plan, focusing on the plan's land-use implications. How we plan and use our land affects how we develop, manage and use energy. For instance, concentrating development allows more cost-effective transmission of energy and, in many cases, lessens demand, e.g., by reducing the distance people need to travel to work, shop and play. Likewise, how we develop, manage and use energy affects how efficiently and effectively we use our land. For instance, encouraging increased use of non-renewable, cheap energy, such as gasoline, can drive suburban sprawl.

Overall, the draft Energy Master Plan makes some positive statements about where the state should steer renewable energy generation, but falls short in making the link between land use and energy by virtually ignoring the transportation sector, the largest segment of energy consumption. The plan also includes several provisions that would weaken the state's commitment to a green economy and a green future.

Locating Solar Facilities

New Jersey Future encourages increased reliance on renewable energy sources including solar energy. The state is unquestionably a national leader in solar installations, due in large part to subsidies that make it economically feasible. The draft Energy Master Plan correctly points out that ratepayer subsidies can be used to incentivize certain types of projects that meet multiple state land-use goals, while withholding

these subsidies appropriately provides an economic disincentive for others. The report specifically calls out brownfields and landfills as examples of the former, and utility scale solar facilities on productive agricultural land as an example of the latter.

New Jersey Future recommends that the Energy Master Plan:

1. Note that single-use solar facilities are not necessarily the highest and best use for *every* brownfield and landfill location; some brownfields and landfills also happen to be prime redevelopment sites in key locations such as next to a train station. Each proposed single-use solar site should be evaluated for its near-term redevelopment potential before installing ground-based solar arrays that will prevent more intensive development of the site.
2. Recognize and incentivize solar facilities in those locations that are consistent with other state policy objectives, including not only brownfields and landfills, but also other impervious surfaces such as rooftops and parking structures that have few or no negative impacts on land preservation or redevelopment potential. Our [research](#) shows that New Jersey has adequate rooftop space to accommodate the state's solar goals for 2026.
3. Recognize that solar facilities not meeting the state's priority siting criteria should not receive equal treatment. For instance, utility-scale solar facilities proposed for open lands can help the state meet its renewable energy goals, but include a number of negative land-use outcomes such as the loss of open space and agricultural land and the potentially costly extension of transmission infrastructure from remote locations.

Energy Use from the Transportation Sector

Transportation, specifically the private automobile, is by far the largest consumer of energy in New Jersey, and is also the fastest-growing. Yet the draft Energy Master Plan, whose purpose is to lay out a strategic vision for the state's energy use, scarcely mentions it. When it does, the plan emphasizes reliance on new technologies to reduce energy consumption from the transportation sector, e.g., electric cars and clean fuels. Although numerous studies have shown that these technologies alone will not be nearly enough to reduce transportation energy consumption, because they will be outpaced by the growth in vehicle miles traveled (VMT), there is no mention in the plan of reducing transportation *demand*.

The 2008 version of the Energy Master Plan, while acknowledging the significant role the transportation sector plays in New Jersey's energy portfolio, opted not to address this sector, leaving it instead for the Department of Environmental Protection's Global Warming Response Act Recommendation report. At the time, this division of labor had some merit. It allowed the Board of Public Utilities to concentrate on areas in which it had greater expertise, while giving the DEP the ability to take a comprehensive look at transportation, including the land-use factors that contribute to it.

Indeed, the DEP report not only recognized the sizeable portion of New Jersey's energy demand attributable to transportation, but minced no words in identifying the state's sprawling land-use patterns as a major contributor to that demand, and with it to greenhouse gas emissions. "Since there is a cause-and-effect link between land development and VMT, land use is directly and synergistically linked to the transportation sector," the report concluded, adding, "[I]t will be difficult for New Jersey to meet its statewide GHG limits without a fundamental shift in the state's historic development patterns."

The DEP report offered a series of recommendations to do just that, including:

- Implementing the State Development and Redevelopment Plan, by keeping it current through routine coordination with wastewater management plans and other plans, and by using it to guide state agency capital investments, plans and programs.
- Working with the state's Metropolitan Planning Organizations to ensure that transportation projects help reduce greenhouse gases.
- Revising the Municipal Land Use Law to encourage municipalities to plan for greenhouse gas reductions, such as by encouraging compact, walkable development near transit, simplifying tools like transfer of development rights that minimize sprawl, and giving municipalities access priority state funding if they plan for sustainable development.
- Revising the Residential Site Improvement Standards to encourage compact development and infill development and to reduce parking requirements.
- Applying NJDOT's "Complete Streets" policy to all roadway projects so that they accommodate all transportation modes, including walking and biking.
- Doubling transit ridership by 2050 through capital investments that maintain and grow the transit system and through provision of a stable source of funding for NJ Transit operations.

Yet since its release in 2009, the DEP report has lain dormant, with no significant action taken to implement any of its recommendations. What we are left with, then, is a draft Energy Master Plan that pays no attention to transportation, and a Global Warming Response Act Recommendations report that pays lots of attention to transportation but is ignored by policymakers. This effectively removes transportation — the largest consumer of energy in New Jersey, as well as the largest and fastest-growing source of greenhouse gas emissions — from consideration in both the formulation of the state's official energy policy and in implementation of strategies for reducing greenhouse gas emissions.

New Jersey Future recommends that the state formally and comprehensively address energy use and greenhouse gas emission from the transportation sector, either by having BPU revise the Energy Master Plan, or by having DEP update the Global Warming Response Act Recommendation Report. Such a strategy should be consistent with a larger economic development strategy that encourages growth in places that require less driving and discourages it in place where driving is the only choice. This framework may be provided by the forthcoming State Strategic Plan.

Commitment to a Green Economy and a Green Future

When Governor Christie announced his intention to pull out of the 10-state Regional Greenhouse Gas Initiative (RGGI), New Jersey Future lamented that it signaled a change in direction away from the administration's stated support for a green future. The draft Energy Master Plan reinforces this trend. The plan reflects a short-term view rather than a long-term vision, focusing more on increasing supply and cutting costs than on reducing demand and securing a sustainable energy future. Its recommendation to reduce incentives for renewable energy generation and energy-efficiency programs undermines this administration's commitment to a green economy, and diminishes New Jersey's role as a national leader in attracting investment in renewable energy.

New Jersey Future recommends that the administration consider revisions to the Energy Master Plan to ensure that it demonstrates a continued strong commitment to the green economy so that New Jersey can attract quality, high-paying jobs in this expanding field. For instance, if the state withdraws from RGGI as planned, it should replace the RGGI-generated funds that were dedicated to increasing the supply of electricity from alternative sources, reducing demand through energy efficiency measures and providing financially strapped municipalities with resources to plan for sustainable land-use and transportation projects that reduce carbon emissions and energy use. With these funds, the state could make our companies more competitive and reduce the cost of energy for all users.

Thank you for your consideration of these comments. Chris Sturm and I would be happy to discuss these ideas with you further. Please don't hesitate to contact either of us at 609-393-0008.

Sincerely,

A handwritten signature in black ink, appearing to read 'PK' followed by a stylized flourish.

Peter Kasabach
Executive Director