



FOR OUR
SUSTAINABLE
ENVIRONMENT
SERVICES

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Submitted electronically via NJDEP-BAQP@dep.nj.gov

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RE: NJPACT - "Reducing Carbon Emissions in New Jersey"

Per the New Jersey Department of Environmental Protection (Department) request on stakeholder feedback on reducing carbon emissions in New Jersey, the following comments are being provided for your consideration.

Baseline levels - 2006

Whereas one of the goals of carbon emissions reduction program is 80% reduction in greenhouse gas (GHG) emissions from 2006 levels by 2050, the accuracy of estimating the 2006 baseline levels will be an important part of the GHG emissions calculations and achieving that goal. Other states have also used a business as usual (BAU) mechanism in addition to the baseline year for establishing a percent reduction. The importance of BAU is that it provides a methodology for calculating a project's future emissions, and it can also form the emission level from which GHG emission reductions must occur when 2006 data is not available. We request the Department consider a target objective of reducing GHG emissions 80 percent below 2006 levels or a ___% (to be established) percent reduction from current BAU estimates.

Slide 32 - Would a performance standard or allowance program make sense for New Jersey to reduce CO2 emissions from non-EGUs?

Market based approaches have been effective in other states in reducing CO2 and greenhouse gas emissions. Cap and trade programs have worked by providing both a limit on emissions and allowance program for trading. Like the Regional Greenhouse Gas Initiative (RGGI) for electric generating units (EGU's) a regional approach would also be beneficial to non-EGU's but difficult to achieve without the regional regulatory framework. New Jersey may want to consider a state-specific carbon offset program. Carbon offset projects could include land conservation if those

areas act as carbon sinks, carbon sequestration projects, renewable energy projects in environmental justice communities, electric vehicle credits, etc.

In general, where the carbon emissions regulations can position New Jersey businesses to be leaders in the Environmental Social Governance (ESG) markets and where the reduced carbon emissions can drive financial investment indices it may prove more successful than merely regulatory compliance.

Thank you for consideration of the above comments on the NJPACT reducing carbon emissions in New Jersey.

Best Regards,

Laura Miner, QEP, LEED GA
President
Fourses, Inc.

