Moving Expeditiously to Fight Climate Change

EmpowerNJ has called for a moratorium on all new fossil fuel projects because of their potential significant GHG emissions (an increase of 32% each year over total current NJ GHGs). Given the difficulties of cutting GHGs (if it were easy it would have been done by now) it appears virtually impossible for the EMP to meet any reasonable goals if it first allows this increase to become permanent. Yet the governor is refusing to enact this moratorium and providing false legal arguments to support his position.

It should be noted there are other things the governor clearly has the power to enact via executive order or push through legislation, that would stop these projects such as ending the practice of allowing ozone credits, creating air deposition regulations, placing limits on CO2/GHG emissions, requiring fossil fuel applicants to conduct a comprehensive alternatives analysis of renewable energy technologies, and enabling the DEP to reject permits for projects that would cause New Jersey to exceed GHG limits. He can't say these are not within his power to change via executive orders and then ask the legislature to pass them into law. The fact that the governor has taken no steps to do anything along these lines, nor ask the EMP to address them, clearly demonstrates his subordination of the climate change problem to near term political pressures. We ask that the EMP developers do their jobs and find ways to move quickly to reduce GHGs regardless of external pressures.

The EMP Must Set an Objective that Supports the IPCC Target for GHG Reductions by 2030

In order to effectively slow/stop climate change, a critical action that must be included in the next version of the EMP is to set a very robust near term target for cutting greenhouse gases (GHGs). The 2018 IPCC report called for a 45% cut in global GHGs (over the 2010 level) by 2030 in order to prevent global warming from exceeding 1.5°C, beyond which even half a degree will significantly worsen the risks of climate change. Currently, the only target for GHGs in the EMP is to cut 80% by 2050. This is too late and insufficient. The EMP must support the IPCC goal and set a 2030 target to cut GHGs by 45% (or an amount based on New Jersey's emissions that supports this global objective).

If the world does not hit this goal for 2030 and keep warming below 1.5°C it will not make much difference what is achieved in 2050 as the battle will have been lost. Without this pressure the EMP GHG reductions will likely be backloaded and NJ will see minimal progress for 2030. Alternatively, if NJ can make a significant cut by 2030 it will be in much better shape to make an effective 2050 target. Even if the EMP does not set a target of 45% by 2030 **it must provide a model of what it would take to get there**. We will not settle for an opaque answer that it costs too much or is just not feasible.

One of the most effective means of cutting GHGs is to stop methane emissions. Methane is 86 times more potent as a GHG than CO2 over a 20 year period which also means that reducing methane is 86 times more effective at reducing GHGs than reducing an equivalent volume of CO2. A moratorium on new gas projects would be a tremendous step in the right direction by removing the threat of increased methane emissions. While such an action appears to be politically unappealing to Governor Murphy, setting a target for a 45% cut in GHGs by 2030 will provide him with political cover for the dramatic changes necessary to meet this goal while also improving his credibility.

The Office of the Governor, Key Initiatives web site (<u>https://nj.gov/governor/initiatives/</u>) states:

"Governor Murphy recognizes that climate change is a fact and an existential threat to our state." While the IPCC report calls for limiting global warming to 1.5°C to avoid the worst effects of climate change, NJ's average warming of at least 3°F and possibly 3.6 °F has already exceeded this (3°F = 1.67°C and 3.6 °F = 2°C) and is warming more rapidly than the national average. Other effects of climate change such as disease carrying insects, algal blooms, increased rainfall and sea-rise flooding including a disappearing Meadowlands, are already problems in NJ as described by the North Jersey Record. Existential threats such as this must be met with powerful responses that sometimes require extraordinary efforts outside the political comfort zone of leaders and their business supporters. EmpowerNJ strongly recommends that in addition to imposing a near term moratorium on new fossil fuel projects, that the EMP set an aggressive target for GHG reductions by 2030 that supports the IPCC recommendations and treats climate change as the existential threat the Governor has described.

The EMP Must Demand Enforcement of Methane Leak Controls

Methane leakage is an enormous problem causing significant increases in greenhouse gas (GHG) growth. Methane is 86 times more potent than CO2 over a 20 year period, which is the relevant time frame here. (Despite this the EMP planners use the 100 year value of 25 which hides the seriousness of this problem). Reducing methane emissions is much more important than reducing equivalent amounts of CO2 and can have a much greater impact on achieving GHG reduction goals.

While the EMP does acknowledge there is a problem with methane leakage it takes a very weak stand on this issue saying:

NJBPU should instruct all gas distribution companies to incorporate advanced leak detection technology into operations to find, quantify, and prioritize gas pipeline repair and replacement and file repair or replacement plans with NJBPU.

Clearly, the EMP authors have no sense of the magnitude of this issue and think that industry self-regulation is the answer. We are in an emergency yet the BPU is afraid to actually regulate its utility masters.

The EMP must demand that the BPU set and enforce very stiff financial penalties for methane emissions. Current estimates of lifecycle methane leaks are in the range of 2% to 4%. At 3% leakage, burning gas is worse for generating GHGs than burning coal. The BPU can set penalties requiring this be reduced to a fraction of a percentage and/or eliminated entirely over the next few years.

This is low hanging fruit when it comes to reducing GHGs. It is far easier than, for example, converting home heating systems from gas to electric heat pumps and significantly improving the percentage of EVs on the roads.

The EMP must demonstrate it understands the seriousness of climate change by calling for effective means to enforce necessary actions, not industry self-regulation.

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