



NEW JERSEY HIGHLANDS COALITION

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September 16, 2019

Aida Camacho, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314, CN 350
Trenton, New Jersey 08625

YOUR WATER YOUR FUTURE

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Re: the Draft 2019 Energy Master Plan

The New Jersey Highlands Coalition represents its 103 member organizations in their interest to protect the water and other natural and cultural resources of the New Jersey Highlands. These resources provide New Jersey with benefits that greatly contribute to our high quality of life, stabilize the economy, and if protected from the destructive impacts of piecemeal, uncoordinated development, as intended by the 2004 Highlands Water Protection and Planning Act, these resources will continue to provide New Jersey with the benefits of clean water, abundant and accessible outdoor recreation, and habitats for a diverse array of plant and animal species for successive generations.

In addition, as we are now beginning to understand, the 255-square mile, contiguous, intact woodlands that represents the forested core of the Highlands, provides New Jersey with its greatest asset in mitigating the impacts of climate change by absorbing and sequestering atmospheric carbon. However, when the Highlands Act was passed, there wasn't a single mention of global warming or climate change. The Highlands Act, as a compromise to entrenched development interests and to insulate the regulatory impact of the legislation from claims of a taking of property without just compensation, incorporated seventeen exemptions and a series of waiver provisions. As a result, the core forest of the Highlands continues to be cleared for development and reduced in size, so that the impact of the Highlands Act has only slowed, but has not protected the Highlands core forest, from continuing impairment.

In addition, the current practices of forest stewardship, an activity that is exempt from the Highlands Act's prohibitions on land disturbances, employs timber extraction to finance its operations, which contributes to the demise of overall forest integrity.

The Highlands Act incorporates exemptions in its prohibitions on development on steep slopes, in Highlands Open Water Buffers, on Prime Groundwater Recharge Areas and for many otherwise protected environmentally sensitive features, for linear development projects. New natural gas infrastructure projects may exercise these exemptions. In addition, Exemption #4, for redevelopment projects, has been used to apply for a new natural gas fired electrical generation facility in the Highlands Preservation Area, in Holland Township, Hunterdon County, whose development would impair valuable Highlands resources.

Despite our general support for many provisions of the draft Energy Master Plan, there needs to be better interagency coordination so that in realizing the beneficial goals of the Energy Master Plan, that unintentionally, resources that contribute to New Jersey's ability to be climate resilient, such as the carbon sequestration values of the Highlands core forest, are not compromised.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Elliott Ruga".

Elliott Ruga, Policy & Communications Director

New Jersey Highlands Coalition

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