

**From:** [Patricia Gordon](#)  
**To:** [comments\\_EMP](#)  
**Subject:** [EXTERNAL] 2019 Draft Energy Master Plan.  
**Date:** Monday, September 16, 2019 11:10:04 AM

---

Those of us in New Jersey who are concerned about our environment ask the Board of Public Utilities to institute the following:

- Establish rules pursuant to the Clean Air Act (Title V), the New Jersey Global Warming Response Act and the NJ Air Pollution Control Act that place limits on GHG emissions and other pollutants, require fossil fuel applicants to conduct a comprehensive alternatives analysis of renewable energy technologies and enable the DEP to reject permits for projects that would cause New Jersey to exceed these limits. Currently, the DEP does not deny permits to any development based on GHG emissions, no matter how high the level.
- Utilize the NJ Air Pollution Control Act to regulate CO2/GHG emissions. The act gives the DEP broad powers to determine air pollutants that are detrimental to public health and regulate them. In 2005 the DEP declared CO2 an air pollutant that affects public health enabling it to regulate CO2/GHG emissions.
- Revise DEP policies that allow polluters to purchase ozone credits, which today allows virtually unlimited production of ozone precursors even in areas of the State that exceed ozone attainment levels and are already rated as 'F' by the American Lung Association for ground level ozone pollution. The DEP must be able to deny applicants permission to purchase credits in areas that already exceed unhealthy attainment limits or when this will cause ground level ozone levels to exceed unhealthy local limits.
- Update the DEP rules regarding air deposition in order to enable rejections of permits that would increase water pollution beyond specific limits.
- Establish rules requiring all applicants for intrastate fossil fuel projects to provide realistic options for utilizing renewable energy technologies.
- Remove the cost cap on renewable energy projects, which does not exist on other energy sources.
- Reverse Governor Christie's rollbacks of regulations on flood hazard rules, water quality management planning rules, the Coastal Area Facility Review Act, Wetlands and Storm Water Management rules that make it easier to build pipelines, other fossil fuel infrastructure developments as well as non-fossil fuel related developments in the Highlands and Pinelands, near water resources and other sensitive environmental areas.
- Champion a full ban on fracking and its associated activities throughout the Delaware River Basin and in New Jersey.
- Appoint new members to the Pinelands Commission and Highlands Council, who will protect these fragile areas and the water supplies they provide and act consistently with Executive Order 28.
- Advise all proponents of the fossil fuel projects that if they continue to move forward on the projects, they do so at their own risk and with the understanding that they may never be built.
- Create a strong green jobs program including training and placement in the new green economy, built on and driving living wage, union jobs in emerging sectors (solar, offshore wind, electric car infrastructure, efficiency, etc.) with a special focus in environmental justice communities and a just transition for displaced fossil fuel workers.

I thank you for your time and consideration.

Patricia Gordon  
Franklin Park, NJ 08823