

Infrastructure Public Comments for NJ BPU Public hearing 9/28/2018 @ 10:00 AM

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Introduction

Hi. I'm David Steinberg from Haddon Heights, Camden County, NJ. I serve on the following boards:

- Board member of Sustainable Haddon Heights
 - Member of the Haddon Heights Green Team
 - Tri-County Sustainability Alliance, which is a hub of Sustainable Jersey
 - Greater Phila Bicycle Coalition, Camden County Chapter
 - Spring Garden Eco-District in Phila.
 - And 2018 nominee for the Nobel Peace Prize. I kid you Not!!
1. The BPU has jurisdictions over RR Short Lines. Can colocation regulations be made to encourage them to deed over any existing or abandoned RR lines to local groups advocating building **Rails with Trails** or **Rails to Trails?** There are many odd-shaped parcels of vacant land that can be used for Community Solar Fields on adjacent land not used by the trail, which gives another amenity to each community that is a host for them. The EMP should explore ways to make these defunct areas more productive for communities.
 2. If we only look at infrastructure - plants, transmission power lines, poles, wires, storage facilities, buildings, etc. and **not the whole environment**, we are missing a vital piece of energy independence that we advocate. Let's look at how we can integrate these infrastructure improvements into the fabric in our communities. Require not only green buildings with green roofs, solar energy, but green walls, Net Positive structures that uses less energy than it creates and other eco-friendly additions and require this for all State departments. Wherever possible encourage plantings, gardens, trails through these improvements with local input for amenities.
 - a. For example, CCMUA (Camden County Municipal Utilities Authority) has created over 100 rain gardens in Camden to help deal with the storm water issues in Camden. Their facility borders the Delaware River in Camden and they have created a public access fishing pier and have set aside, financed and created a half a mile long 10-foot wide trail along their frontage of the River to connect with a 6-acre unused land locked parcel for which they have created a public park. It overlooks a magnificent view of Philadelphia!
 - b. They also have put money into local non-profits such as the Center for Environmental Transformation and other non-profits that are benefitting the South Camden neighborhood they are located.
 - c. In addition, they recently are funding some design and engineering work for a segment of a 32-mile trail through Haddon Heights and Audubon in Camden County.
 - d. Why can't other quasi-governmental entities be empowered to do similar things throughout NJ?

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3. Regarding Flood Plain Development, developing infrastructure can end up being an extremely costly measure, especially with rising sea levels, thus new and existing infrastructure should take this fact into account in order to prevent the loss of it or need for costly relocation. Google has recently created a projected Flood map for the year 2100. Here is a link to it showing the changes due to sea rise: https://xs.climatecentral.org/#14/39.9218/-75.1875?scenario=extreme_p50
4. We remove many plants and trees and alter the environment when ever we do infrastructure improvements. Let's put back the equivalent number of plants and trees lost on site and plant them either onsite or off site elsewhere in NJ. This will create a balance so that the environment will not be depleted of the oxygen they put into the atmosphere. For example, There are many highways intersections that have grass only, and no trees. We need trees!
5. Concerning solar array installations, in areas where installations exist, the EMP should explore colocation policies that require nonproductive land surrounding a solar field to have native plants and flowers planted to provide habitat for our essential pollinators. The loss of bees threatens our agriculture and our status as the Garden State. If Oregon can do it, NJ can do it. Here are links to a couple of articles about how bees can be compatible with Solar fields:
 - https://images.fastcompany.net/image/upload/w_596,c_limit,q_auto:best,f_auto,fl_lossy/wp-cms/uploads/2018/06/3-this-solar-farm-doubles-as-a-home-for-bees.jpg
 - <https://www.fastcompany.com/40588875/this-new-solar-farm-combines-clean-energy-and-beehives>
6. Workforce Development - As we strive toward the clean energy economy of the near future, workforce development will be a key component that ensures everyone, especially those in low-moderate income households and communities, have access to workforce development programs and are reaping the benefits of these emerging employment sectors. Therefore, why not have a requirement of training and hiring low-income people for these permanent jobs so that money earned in these towns, stays in these towns. This would have a positive economic impact and social impact in communities such as: Trenton, Camden, Newark, Patterson, etc. The benefits should be focused toward these communities so that everyone has the opportunity to participate.
7. When I worked at Solar City (now Tesla) last year, it was not unusual for the permitting process to have extended period wait times for approvals from 3 to 6 months. Homeowners were frustrated with these long delays and in some cases cancelled the contracts and instead of going on the grid with renewable energy, they remained off of it. The EMP should evaluate methods to streamline the permit and approval process from municipalities and the Utilities. Philadelphia did it. NJ can do it, too.
 - a. Make a single fee structure throughout the state and not allow municipalities to charge a percentage of the cost as a fee. There could be one fee for Residential, one fee for Commercial, and one for Community Solar. The fees should be enough to cover the reasonable time for the municipality and utilities to approve a project. Fee contingencies and approval times could be built into a project that takes longer because it is bigger or more complicated.

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- a. Statewide standards should be enacted to provide uniform standards, including the maximum time for Electrical and Building Permits to be issued. Once that is met, then it should be automatic approval unless there are mitigating factors.
 - b. Standards should be set about angles toward the sun and landscaping around ground-mounted solar fields to shield them from glare regarding any neighbors, such as those on a hill or in a valley. I would not want to be a homeowner who has to put up with neighbor whose solar panels reflect sunlight in my windows. It could also be a potential fire hazard similar to sun rays concentrated through a magnifying glass could ignite a fire in curtains.
 - c. The municipalities and utilities must be given a reasonable time period to approve a project. Recommend 45 days for automatic approval, unless conditions warrant resubmission of the plans. And then 30 days for resubmission. Submission can be simultaneous with the approval of the municipality, contingent on the approval of the utility and vice versa. The clock starts ticking for the 45-day period only with the submission of the second set of completed plans.
8. What incentives can be used to promote 100% renewable energy by 2050?
- a. Taxes – there are ways that the legislature can encourage renewables through wise use of taxing entities that produce carbon pollution and providing tax breaks for those that do.
 - b. Employment – Provide tax incentives for those industries that hire people in the renewable industries
 - c. Do a review of the State building Codes and provide incentives that promote Net Zero buildings.
 - d. Encourage remediation now by making it difficult for companies that pollute the air, land, and water to escape from liability of their actions. Take action now to prevent their going Bankrupt and avoiding it. Issues such as bankruptcy of the plant owners must be considered as this would require taxpayer funding from already stretched State and local budgets to do remediation.
 - e. It is time to think about remediation and cleanup of (the soon to be) closed chemical plants, and other real estate and the effect on the communities and the environment. It is time to start planning for the possible reuse of these huge parcels of former chemical plants, and determine if it feasible to make forests, meadows, parks, or can some of this land be reused for housing, commerce, industry of another type.
 - f. The University of Penna recently completed a study on the possible reuse of the refineries in Philadelphia which can be accessed with this link:

<https://kleinmanenergy.upenn.edu/paper/beyond-bankruptcy>

Thank you for your time.