



Environmental Justice Task Force

Comments on reducing New Jersey's GHG emissions

March 10, 2020

Introduction

Unitarian Universalist FaithAction NJ is a faith-based nonprofit that envisions a just New Jersey free from systemic oppression and greed, full of engaged people committed to each other, to our communities, and to the earth. Our comments reflect this vision along with the Unitarian Universalist principles of the inherent worth and dignity of every person; justice, equity and compassion in human relations; and respect for the interdependent web of all existence of which we are a part.

General Issues

1. *Greenhouse gases other than CO₂*: At the public hearing on February 25 at the DEP, the discussion of short-term actions was restricted to reductions in CO₂ only. While it is smart to work on a part of the problem that you can address immediately, without further regulatory or legislative changes, it is also important not to take steps that will defeat the long term goals.

For example, we have reduced CO₂ emissions in the last two decades by shifting to natural gas and emitting more methane. Unfortunately, methane has a much higher global warming potential than CO₂. Furthermore, recent research¹ suggests that we are seriously underestimating the methane actually in the atmosphere. For these reasons, we must make sure that we are not increasing other GHG emissions in order to reduce CO₂.

This is not to say that the DEP will ignore the methane issue, but to highlight the fact that focussing on only one kind of emissions in the rules may have problematic effects if there is an approach that reduces CO₂ emissions while increasing other harmful emissions, especially if that is cheaper for industry to implement.

2. *Necessary reductions by 2030*: According to the UN Environment Programme (UNEP) annual emissions gap report, we need to reduce GHG emissions 45% by 2030 to avoid exceeding 1.5°C, a temperature rise that would have disastrous consequences. The EMP and the DEP's plans are not looking at a decline this steep in emissions. It is time to begin planning how to reduce that much.

¹ Hmiel, B., Petrenko, V.V., Dyonisius, M.N. *et al.* Preindustrial ¹⁴CH₄ indicates greater anthropogenic fossil CH₄ emissions. *Nature* **578**, 409–412 (2020). <https://doi.org/10.1038/s41586-020-1991-8>

3. *The transportation sector:* The transportation sector emits 40% of the GHG emissions in New Jersey. Without addressing these emissions, it will be impossible to make progress. Is legislation needed to make it possible to address transportation?

Responses to Specific Questions

1. *Effects on public health.* Considering only carbon intensity may produce problematic effects if the levels of other air pollutants and non-CO₂ greenhouse gas emissions from combustion go up, as they might because unlike the carbon intensity, the levels of the other pollutants may depend on the way the fuel is burned. If the technology used for burning results in more pollutants, the results for health will be bad, especially in environmentally burdened communities.

Similarly, it would seem that increasing efficiency would be good, but not if it results in increases in co-pollutants.

Reducing energy demand would seem to be the surest way to reduce emissions without the possibility of side effects.

Work out how to dispose of solar PV panels and wind turbine blades before installation, because dumping is common in low-income communities and bad for health.

2. *Effects on environmentally burdened communities*
Unfortunately, increasing efficiency is not always available in EJ communities due to problems with the existing housing infrastructure. Finding creative ways to increase efficiency in low-income communities would be a great contribution.

Expensive energy-efficiency measures, if imposed on low-income communities, may even make housing more expensive and less accessible to low-income households. This does not mean that they should not be encouraged; it does mean that financial incentives for residents and landlords are at least as important as incentives for wealthier people to purchase new electric vehicles.

Similarly, electrification efforts don't always apply in low-income communities — for example, installing solar panels or buying electric vehicles. It is important to make it possible for low-income communities to electrify while lowering their costs. The BPU's community solar and community microgrid are excellent examples. Additional efforts along these lines should be helpful.