

July 25, 2008

Monmouth County Planning Board
Hall of Records Annex
One East Main Street
Freehold, NJ 07728

New Jersey Board of Public Utilities
Office of Policy and Planning
Two Gateway Center
Newark, NJ 07102

Re: Monmouth County Planning Board Comments on the draft New Jersey Energy Master Plan

The Monmouth County Planning Board staff supports the efforts of the State to develop and implement an energy plan for New Jersey to address the growing concern for supply and demand needs and the issues associated with global climate change. Planning staff has been attending your public information meetings and has read the draft EMP. We offer the following comments for your consideration:

- The Plan's implementation strategies identify the Responsible Party for each Action Item associated with each of the Plan's goals. The final Plan should identify the anticipated role of county and municipal government entities in achieving the goals aimed at the regional and local levels. Developing county and municipal sustainability action plans consistent with the goals of the EMP will provide the mechanism to accomplish statewide goals more effectively, ultimately reaching the end-user. Monmouth County is currently in the beginning phase of developing a sustainability plan for the County through the implementation of policies and other program initiatives that will reduce the County's greenhouse gas emissions to levels identified by the Governor's Executive Order Number 54.
- The State Development and Redevelopment Plan (State Plan) is intended to provide guidance for all planning decisions that impact the State and its residents. One of the goals of the State Plan is to integrate planning and implementation statewide through coordinated efforts amongst public entities, thereby achieving consistency of all plans with the State Plan. The EMP should address its consistency with the goals and strategies of the State Plan.
- The Plan should address the connection between land use decisions and the need to reduce energy demand. The Plan should include incentives for municipalities to incorporate some of the EMP's energy efficiency strategies into their Master Plans at the time they are reexamined. The Plan should recommend the adoption of local ordinances to assist municipalities in reducing their carbon footprint, which is a goal of the EMP.
- The Plan should identify non-technological policies encouraging sustainable planning practices to address New Jersey's energy consumption concerns. Examples include but are not limited to size of structures and building orientation, site design, appropriate use of vegetation for cooling and reducing the impacts of CO2 emissions as well as mixed-use and transit oriented development. These are all examples of methods that integrate environmental planning with technology to achieve the goals of the EMP.

- The Plan discusses the issue of reducing energy demand through several initiatives. It is unclear as to whether the future demand needs are based on increased usage by the current population or as a result of projected future population growth and potential changes to the household structure, or both. The Plan should clarify the method used to determine future demand.
- The Plan refers to distributed generation as a means to reduce energy demands placed on the grid, in addition to providing cost savings to the consumer, when energy technologies, i.e. solar systems are strategically sited in locations that provide access to participation by small scale commercial and residential customers. The Plan should place greater emphasis on distributed generation as a stand alone Action Item within the Plan's goals and strategies. All available technologies for distributed generation should be considered within the Plan. The Plan should also emphasize the savings to the ratepayer as well as identify the types and levels of funding required and available for smaller facilities and customers as well as large scale commercial and industrial users.
- Action Item 4 under Goal 1 addresses the need to increase education and outreach for the public and private sectors. For the EMP to be successful, a greater emphasis must be placed on the outreach and education needs for each goal in the Plan. One of the strategies for implementing the outreach and education component of the EMP should be to provide the appropriate level of understanding of the Plan to each of the target audiences identified by each Action Item; thereby clarifying the roles and responsibilities required of them as stakeholders.
- The overall goals of the EMP reflect specific long range targets of achievement as set forth by the Governor. Although some of the strategies have specific target timeframes, many are undefined. Each of the goals and associated strategies should identify quantifiable measurements of success. Those measurements should include specific targets and indicators with an accompanying timeline including interim short-term milestones, which will identify the progress of each target and potential need for modification to assure each is realized.
- A suggested addition to the format of the final document is the inclusion of a toolbox of resources for those who wish to obtain additional information on specific topics. The toolbox should contain contact information including website locations for resources identified in the Plan, as well as self-assessment tools for residential and commercial users to determine cost savings, and any additional items that may assist the user of the Plan.
- To further support and encourage the use of the document, the Plan should include an index as well as definitions to clarify the terminology used in the document.

Thank you for the opportunity to comment on the draft New Jersey Energy Master Plan. If you have any questions regarding the Planning Board's comments, please contact Ann Waters at 732-431-7460.

Sincerely,

Robert W. Clark
Director of Planning

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