

## EmpowerNJ Comments to NJBPU Regarding Transportation - 2024 Energy Master Plan Update

To: Board of Public Utilities Secretary, Sherri L. Golden

Re: Docket No. QO24020126

Simply put, New Jersey cannot reach its climate goals if the State does not reverse its policies of spending tens of billions of dollars on highway expansions and not investing sufficient funds to maintain, improve and expand public transportation. We do not necessarily need to spend more money on transportation, but need to spend it more wisely.

This is nothing radical. Colorado and other States already require climate tests before approving highway expansions and prioritize public transportation over highway expansions. Replicating this in New Jersey is essential not only to meet our climate goals but also improve the lives of New Jersey residents and foster economic growth.

Vehicles are far and away the largest source of greenhouse gas emissions (GHGs) in the State.

The equations for reducing or increasing GHGs in the transportation sector are simple and undisputable: 1) bigger highways means more vehicles, more vehicles means more vehicle miles traveled (VMT) and more VMT means more GHGs and toxic pollutants; and 2) improved and expanded public transportation means fewer vehicles and reduced VMT, GHGs, and toxic pollutants. It is just that simple.

The State is currently planning to spend tens of billions of dollars on highway expansions. While the worst of these is the plan to spend \$10.7 billion on the unneeded, unwanted and unpopular expansion of an 8.1 mile portion of the Turnpike (the Newark Bay Hudson County Extension), numerous other multi-billion highway expansion projects are also planned and proceeding around the State. History has shown, time after time, that because of induced demand, expanded highways quickly fill to capacity resulting in increased VMT, GHGs, and pollutants without reducing traffic congestion. Induced demand is a fundamental and immutable law of highway engineering and those, such as the NJ Turnpike Authority, who deny that induced demand exists or minimize its impact are no different than climate deniers.

Meanwhile, NJ Transit is chronically underfunded and needs dedicated funding both to sustain its current operations and to fund capital projects. If the proposed corporate transit fee (CTF) is passed, it would provide operating funds to allow NJ Transit to maintain its current operations without cutbacks in service. But even if the CTF is passed, it will not provide funds for desperately needed capital programs such as the long-delayed transition to electric buses, the expansion of the Hudson Bergen Light Rail Line and new train cars.

New Jersey's current policy of prioritizing highway expansions over public transit is a policy out of the 1950s that totally ignores the climate crisis, historical experience with expanded highways, and that investments in public transportation produce far more economic growth than highway expansions as people prefer to live and work where there is easy access to transit.

While the transition to electric vehicles should be encouraged, this will not be a panacea and certainly not a justification for highway expansions as some have suggested. Under the rosiest of projections, the vast majority of vehicles on the road will continue to run on fossil fuels for

decades. The average car on the road is 12 years old, meaning that every gas-powered car sold today will emit carbon for at least another decade. Electric cars accounted for just under [8 percent](#) of new cars sold in the United States last year.

Colorado should be a model for New Jersey. It has adopted rules requiring state and local transportation agencies to demonstrate how new highway projects would reduce GHGs. <https://www.coloradosos.gov/CCR/GenerateRulePdf.do?ruleVersionId=10428&fileName=2%20CCR%20601-22>. Within a year of the rule's adoption in 2021, Colorado's Department of Transportation had canceled two major highway expansions, including Interstate 25, and shifted \$100 million to transit projects. In 2022, a regional planning body in Denver reallocated \$900 million from highway expansions to multimodal projects, including faster buses and better bike lanes.

Other states are following Colorado's lead. Last year, Minnesota passed a [\\$7.8 billion transportation spending package](#) with provisions modeled on Colorado's greenhouse gas rule. Any project that added road capacity would have to demonstrate how it contributed to statewide GHG reduction targets. Maryland is considering [similar legislation](#), as is [New York](#).

Oregon's DOT has adopted a five-year Climate Action Plan to address the impacts of climate change and extreme weather on the transportation system in Oregon, which includes actions to reduce GHGs from transportation, improve climate justice and make the transportation system more resilient to extreme weather events. Oregon considers GHGs when deciding what projects to fund at each stage of the development of a project.

[https://www.oregon.gov/odot/Programs/Documents/Appendix\\_A\\_Climate\\_Action\\_Plan\\_2021-2026.pdf](https://www.oregon.gov/odot/Programs/Documents/Appendix_A_Climate_Action_Plan_2021-2026.pdf).

California prioritizes emissions reductions as part of the state's transportation plan per the AB285 legislation. The state measures induced traffic during environmental reviews of new highways and plans to prioritize funding toward fixing existing roads rather than building new ones. Officials halted a plan to widen the 710 freeway, which carries truck traffic from the Port of Long Beach, over concerns that it would displace residents in low-income neighborhoods and worsen air pollution.

<https://www.latimes.com/california/story/2021-05-22/710-freeway-expansion-stalls>

In Virginia, transportation planners were considering whether to alleviate traffic jams on I-95 between Fredericksburg and Washington by adding two extra lanes at a cost of \$12.5 billion. Ultimately, understanding that induced demand is the first law of traffic congestion, Virginia decided to instead spend \$3.7 billion to expand commuter rail service.

<https://www.washingtonpost.com/transportation/2021/06/15/virginia-amtrak-passenger-rail/>

Oregon, Massachusetts and Washington all have policies to create walkable, bikeable neighborhoods, well connected by affordable, frequent transit. See USCA 2021 Annual Report FurtherFasterTogether;

[https://static1.squarespace.com/static/5a4cfbfe18b27d4da21c9361/t/61ba44e0a217c56296a76953/1639597299217/USCA\\_2021+Annual+Report\\_FurtherFasterTogether.pdf](https://static1.squarespace.com/static/5a4cfbfe18b27d4da21c9361/t/61ba44e0a217c56296a76953/1639597299217/USCA_2021+Annual+Report_FurtherFasterTogether.pdf)

The EMP should recommend that the State follow the examples of these states by adopting a comprehensive transportation plan that prioritizes spending for public transit, road repair, safe streets, bikeways, greenways, walkways, and environmental justice over highway expansions.

Despite vehicles being by far the largest source of GHGs in the State, the 2019 EMP gave short shrift to reducing GHGs in the transportation sector. This must be a primary focus in the 2024 EMP.

We are happy to provide NJBPU with more detailed recommendations and additional facts and resources to back up each of the statements and positions set forth above.

The EmpowerNJ Steering Committee

John Reichman, Blue Wave NJ  
Ken Dolsky, Don't Gas the Meadowlands Coalition  
Matt Smith, Food & Water Watch  
Doug O'Malley, Environment New Jersey  
David Pringle, David Pringle Associates LLC  
Amy Goldsmith, Clean Water Action  
Tracy Carluccio, Delaware Riverkeeper Network

Cc: Governor Murphy  
Christine Guhl-Sadovy  
Shawn LaTourette  
Eric Miller  
Henry Gajda  
Chance Lykins