

June 12, 2024

Re: In the Matter of the 2024 New Jersey Energy Master Plan  
Docket No. QO24020126

We, the undersigned organizations, are pleased to submit these comments to the New Jersey Board of Public Utilities (“BPU”) regarding the 2024 Energy Master Plan section on emissions from the Transportation Sector.

- I. **In response to Transportation Question One: “What could the evolution of transportation electrification incentives look like? On which sectors should the State focus for spurring electrification (for instance, used EVs, medium- and heavy-duty vehicles, and/or ports)? Where will incentives no longer be necessary and when?”**

We recommend prioritizing medium and heavy-duty vehicles in two ways:

- Providing full funding for NJ Transit to expand service first and foremost, then meet bus electrification targets.
- Accelerating provisions for medium- and heavy-duty utility programs by establishing minimum filing requirements and prioritizing electrifying fleets in urban, overburdened communities.

- II. **In response to Transportation Question Two: “As the State moves to reduce emissions from the transportation sector, what can be done to reduce overall vehicle miles traveled in the state? What collaborations are necessary, and what strategies and examples can New Jersey employ and learn from to achieve this goal?”**

We address the questions in two sections:

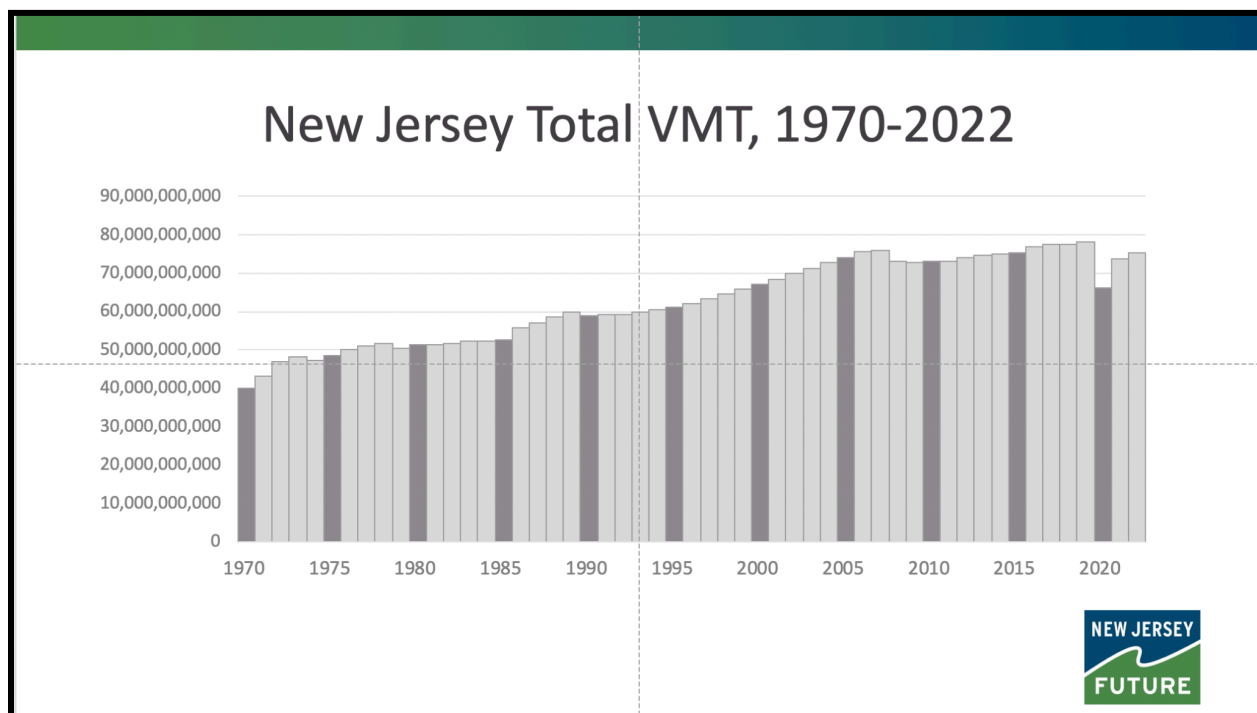
- A. Background: The Benefits of Reducing Vehicle Miles Traveled for Carbon Emissions and Justice 40
- B. Actions to Reduce Overall Vehicle Miles Traveled in New Jersey

**A. Background: The Benefits of Reducing Vehicle Miles Traveled for Carbon Emissions and Justice 40**

Recent government efforts—whether at the state, national, or international level—to address transportation’s carbon footprint have largely focused on expediting a shift to electric vehicles (EVs). While critical, electrification of the fleet alone is insufficient to meet New Jersey’s ambitious greenhouse gas (GHG) reduction goals for transportation, especially in the near term as electricity generation still relies partly on GHG-emitting fossil fuels and as the transition to EVs takes time. Consider the following arguments:

Reducing vehicle miles traveled (VMT) will prevent increased GHG emissions caused by more driving.

The slide below shows total VMT,<sup>1</sup> which has increased steadily since 1970 except for occasional dips, such as after the recession of 2008 and the coronavirus pandemic in 2020. (By 2022, statewide VMT had increased to the level seen in 2015 and is likely still rising.) Absent policy interventions, we can expect continued increases in VMT and associated GHG emissions that will offset reduced GHG emissions from vehicle electrification.



Reducing VMT will enable the state to more quickly reach its GHG emission reduction goals for the transportation sector – without having to invest in costly road and highway expansions. As explained in New Jersey Future’s report, [Reducing the Need to Drive is a Win for Both Climate Change and Quality of Life](#) (attached), the cleanest car trips are the ones that are never taken. And every 10% reduction in the average driving trip length, for the many trips that are still taken by car, is the GHG-reduction equivalent of replacing 10% of the vehicle fleet with zero-emission vehicles.

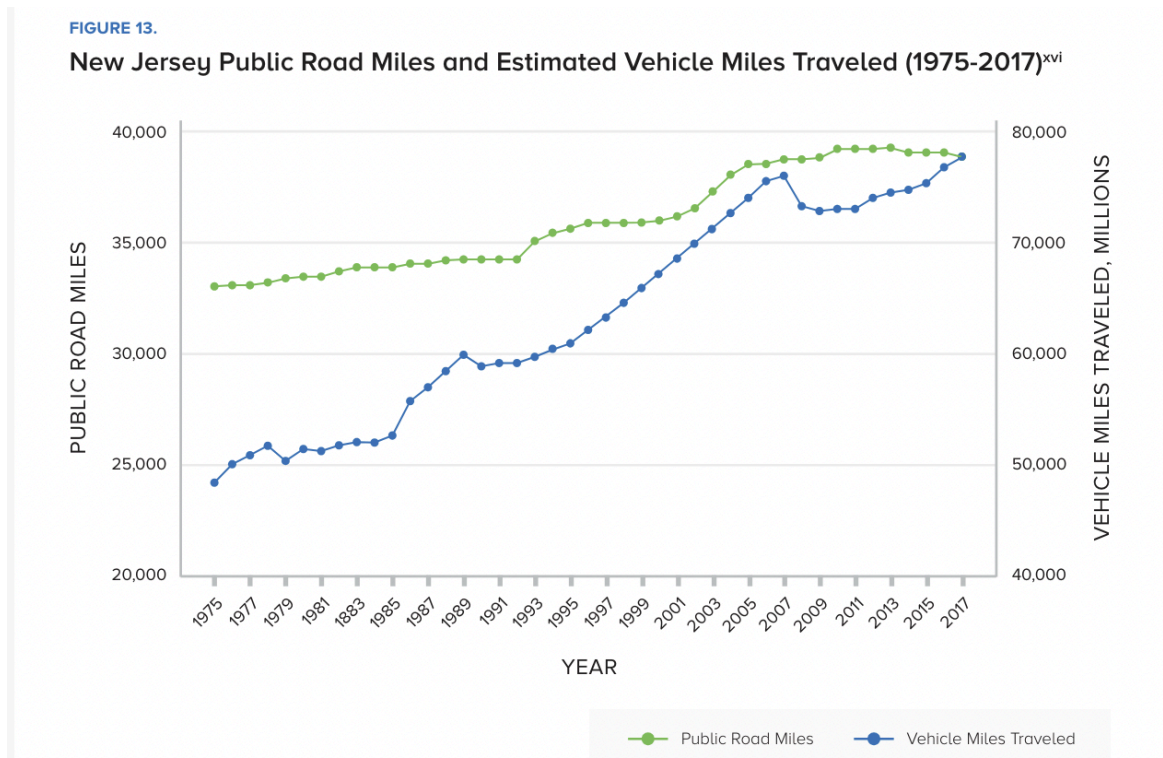
*Greenhouse gas (GHG) emissions from the transportation sector are a function of both the kinds of vehicles people drive and how much they drive them.*



<sup>1</sup> Source: NJDOT Public Roadway Mileage and Vehicle Miles Traveled, at <https://www.nj.gov/transportation/refdata/roadway/vmt.shtm>

Tools to reduce VMT will help the state’s transportation agencies reduce traffic congestion

Most adults in New Jersey commute by car: 75% of all workers statewide, and when considering only those not working from home, the percentage rises to 84%. Over the past 50 years, the amount of driving, measured by VMT, has risen steadily as populations and jobs have increased and spread out. But, as shown in the chart below from the 2019 Energy Master Plan, growth in the state’s public road miles has leveled off, likely related to the state’s dense development. Congestion challenges transportation agencies and residents alike: New Jersey has the third longest average commute in the nation, and pedestrian fatalities are high.<sup>2</sup>



An Energy Master Plan that calls for improving affordable transportation modes can be consistent with Justice 40. EV rebates primarily serve affluent residents. Many lower-income residents cannot afford to purchase a car, let alone a more expensive electric vehicle. This is especially true for the 36% of the population living below income level for “ALICE” residents: Asset Limited, Income Constrained, Employed — who do not earn enough to afford the basics where they live.<sup>3</sup> According to the federal Justice 40 initiative, 40% of the overall benefits of certain federal climate and clean energy and other investments should flow to disadvantaged communities that are marginalized by underinvestment and overburdened by pollution.<sup>4</sup>

<sup>2</sup> NJ’s pedestrian fatality rate per person is 19th in the nation ([DANGEROUS BY DESIGN 2022 | Smart Growth America](#)), and the percent of total pedestrian fatalities within all traffic fatalities in New Jersey is nearly double the national average (31 percent vs 17 percent) ([NJ Highway Safety Annual Report](#)).

<sup>3</sup> <https://www.unitedforalice.org/new-jersey>. 2022 data.

<sup>4</sup> <https://www.whitehouse.gov/environmentaljustice/justice40/>

VMT reduction measures can naturally be designed to serve disadvantaged communities. Residents and workers would benefit from having more affordable, safer, and convenient alternatives to driving everywhere. Thankfully, New Jersey’s transportation system is well-positioned to improve options for walking, biking, and taking transit. Its extensive transit network provides commuter rail, light rail, buses, and ferries in the more developed parts of the state. Many New Jersey residents already live in walkable communities where destinations like jobs, schools, and retail shops are so close that they could walk or ride a bike or scooter if provided with safe sidewalks and paths.

## **B. Actions To Reduce Overall Vehicle Miles Traveled in New Jersey**

The actions that can be employed to reduce VMT involve intentional transportation investment and planning, better measurement, and also land use and development policies that support sustainable transportation modes (e.g., walking, biking, and shared-use options like e-bikes, scooters, and public transit). We recommend the following mutually reinforcing actions:

- 1. Enact a law to reduce VMT in New Jersey:**
- 2. Provide dedicated, sustainable operating funding for New Jersey Transit**
- 3. Adopt an updated State Development Redevelopment Plan in a timely fashion**
- 4. Include Energy Master Plan provisions for measuring and annual public reporting on greenhouse gas reduction as well as progress on actions that contribute to VMT reduction**
- 5. Update the New Jersey State Trails Plan to prioritize trails and shared-use paths for transportation.**
- 6. Implement a statewide Vision Zero or “Target Zero” Action Plan**
- 7. Adopt additional important supporting government actions**

### **1. Enact a law to reduce VMT in New Jersey:**

Setting targets to reduce VMT and measuring potential VMT impacts of new developments and transportation investments are critical first steps that catalyze planning and implementing a holistic suite of effective strategies. New Jersey should set targets around VMT reduction and begin to measure VMT impacts, as well as direct relevant state agencies to invest more in VMT-reducing projects.

New Jersey Future and partners, including Tri-State Transportation Campaign, have discussed the potential requirements that could deliver VMT reduction in New Jersey, drawing on best practices from other states. The approach would provide the state Department of Transportation with powerful new tools to reduce the need for driving. It would establish a way to measure vehicle miles traveled and set achievable statewide targets for reducing VMT. It could also direct relevant state agencies to invest more in safe, convenient alternatives to driving, including facilities for walking, biking, and using transit, and to support local governments in doing the same. The list of potential components includes:

- Measurable targets for total and per capita VMT reduction in 2035 and 2050

- Collection of odometer readings by the Motor Vehicle Commission
- Integration of VMT targets by DEP into the Comprehensive Climate Action Plan (CCAP), which will serve as an update of the NJ Global Warming Response Act 80x50 Report
- State agency VMT reduction plans and annual progress reports developed in consultation with Metropolitan Planning Organizations (MPOs)
- A suite of NJDOT actions to achieve VMT targets, including to:
  - Incentivise developments that reduce VMT, based on a VMT impact analysis of large land development projects conducted by multiple state agencies;
  - Revise the state long-range transportation plan and the state transportation improvement program to meet VMT goals
  - Invest the maximum amount of certain state and federal funding programs toward VMT-reducing projects
  - Elevate the Bureau of Safety, Bicycle, and Pedestrian Programs to a Division with new functions
  - Fund an active transportation-oriented municipal technical support program in Local Aid district field offices.
- A VMT Advisory Commission to review progress and advise the state government
- An NJ Turnpike Authority review process to assess project impacts on VMT.
- A task force/blue ribbon commission on “Creative Capital Programming.”

Other states, such as [Connecticut](#), [Delaware](#), [Maine](#), [California](#), [Minnesota](#), and [Washington](#), have established VMT reduction targets, recognizing the importance of both the overall strategy and the need for a coordinated effort to achieve broader GHG reduction goals. (See [VMT Targets in States Outside NJ](#), attached.) In addition:

- [California](#) adopted legislation (SB 743) to reduce VMT by requiring the environmental impact analyses of real estate and transportation projects to measure VMT instead of traffic congestion levels.
- The [Colorado Department of Transportation \(DOT\) adopted a standard](#) that requires it and the state’s five Metropolitan Planning Organizations (MPOs) to 1) determine the total pollution and GHG emission increase or decrease expected from future transportation projects, and 2) take steps to ensure that GHG emission levels do not exceed set reduction amounts.
- In [Oregon](#), a [Statewide Transportation Strategy](#) has been jointly adopted [by multiple state agencies](#) to aid the state in achieving its GHG emission reduction goal of 75% below 1990 levels by 2050. While it does not set specific VMT targets, it includes reducing VMT per capita as a key objective as well as sections on “Transportation Options” and “Efficient Land Use” that are aimed at reducing vehicle travel.
- [New York’s Climate Scoping Plan](#), published in Dec. 2022, has a Transportation section in which two of the four strategies – “Enhance Public Transportation and Mobility Alternatives” and “Promote Smart Growth and Mobility-Oriented Development” – are focused on reducing VMT.

In total, a 2023 report by the Natural Resources Defense Council, [Getting Transportation Right: Ranking the States in Light of New Federal Funding](#), found “17 states with a quantified goal or projection for reducing VMT” as part of their strategies for meeting GHG reduction goals.

Reducing Vehicle Miles Traveled also depends upon critical state government actions that are currently under consideration or in process:

**2. Provide dedicated, sustainable operating funding for New Jersey Transit** that enables maintenance of existing service in the short term, and positions the agency to grow and modernize service in the near future. New Jersey Transit faces a fiscal cliff once special federal pandemic-era subsidies end in mid-2025. Without such funding, the agency will need to cut service, leading former riders to drive more.

**3. Adopt an updated State Development Redevelopment Plan in a timely fashion** that provides a statewide blueprint for development in locations and densities that support the use of transit, walking and biking, and shorter driving trips. A Draft Preliminary State Plan should be considered for approval by the State Planning Commission this summer and then released to local governments for a required “cross-acceptance process.” See: <https://www.publicinput.com/njstateplan>.

**4. Include Energy Master Plan provisions for measuring and annual public reporting on greenhouse gas reductions and progress on actions that contribute to VMT reduction**, including transit ridership, miles of complete street construction, and Transportation-Oriented Development.

**5. Update the New Jersey State Trails Plan to prioritize trails and shared-use paths for transportation.** The Plan should focus on connectivity and more equitable access for both local and regional recreation trails, encourage trails and shared-use paths as sustainable mobility alternatives to motor vehicles, and address public transit gaps with connections offering greater access for transit-dependent residents.

**6. Implement a statewide Vision Zero or “Target Zero” Action Plan** to create safer roadway conditions, that would encourage more residents to opt for alternative mobility options (e.g. walking, biking, scooters, or transit).

**7. Adopt additional important supporting government actions.** All levels of government can and must contribute to this effort. We highlight priority actions:

- Leverage the federally-funded Climate Pollution Reduction Grant (CPRG) program to implement measures in the Priority Climate Action Plans (PCAPs) prepared by NJDEP, NJTPA, and DVRPC that reduce emissions.
- Encourage and support the adoption of municipal land use and zoning that allows for compact, walkable development. An important near-term opportunity is the June 2025 deadline for municipal Housing Elements and Fair Share Plans to satisfy the Mt. Laurel Fourth Round requirements.

- Shape required guidance from the Office of Planning Advocacy for municipal Housing Elements and Fair Share Plans to support VMT reduction. Plans from county planning agencies can help municipalities locate affordable housing near existing destinations and provide safe bike and pedestrian infrastructure connections.
- State and local governments should remove minimum parking requirements in compact walkable areas, especially near transit stations.
- Provide state funding for micromobility incentive programs, especially to make E-bikes accessible to lower-income people.
- Increase state funding and technical assistance for local implementation of complete and green streets that focus on eliminating road deaths and prioritizing the needs of underserved populations (seniors, children, persons with disabilities, low-income residents, carfree households, etc.).
- Adopt more powerful state incentives to encourage local actions in support of Transit-Oriented Development.
- Expand county bus/shuttle operations to serve nearby NJ Transit hubs and town centers with regular all-day service.

Thank you for the opportunity to submit written comments. For questions or more information, please contact Chris Sturm at [csturm@njfuture.org](mailto:csturm@njfuture.org).

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Attachments:

- [VMT Targets in States Outside NJ](#)
- [Reducing the Need to Drive is a Win for Both Climate Change and Quality of Life](#)