



Comments on  
New Jersey Turnpike Authority's Proposed  
2020 Capital Improvement Program

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Dear Executive Director John M. Keller:

New Jersey Future submits the following comments on the New Jersey Turnpike Authority's proposed 2020 capital improvement program.

**Emphasis on reducing vehicle miles travelled.** Transportation infrastructure is a critical component of our state's social and economic fabric. Each year it is essential that we invest in maintaining this critical infrastructure while at the same time re-examining our transportation priorities in the context of the many policy goals that the state government is seeking to advance. With this in mind, New Jersey Future has several concerns about the proposed spending plan:

The program includes more than 100 miles of highway widenings, with a total cost of about \$9.4 billion (this does not include \$6.5 billion for two projects that are predominantly about bridge replacement, with only ancillary lane widenings). Such extensive additions to highway lane-mile capacity will inevitably lead to increased vehicle-miles traveled (VMT), which runs counter to the administration's recognition of the importance of reducing VMT as a strategy for reducing greenhouse gas (GHG) emissions, as articulated in the Energy Master Plan (specifically, in Goal 1.2 of the Energy Master Plan, labeled "Improve connections between people, jobs, and services").

The transportation sector represents the single largest emitter of greenhouse gases, accounting for 42 percent of New Jersey's total GHG emissions as of 2018, according to the Department of Environmental Protection's most recent greenhouse gas inventory. More than two-fifths of our GHG emissions are generated by moving people and things from one place to another, mainly by car and truck. If we are serious about meeting our GHG reduction goals, we need to be looking for ways to decrease VMT, not increase it.

We know that an important way to reduce VMT is to shift rides toward our public transit system. How will this spending program coordinate with and support a mode shift from car and truck traffic to transit?

**Impacts of climate change and sea-level rise.** Capital projects do not appear to have been screened for long-term climate change impacts. Several projects listed in the program expand infrastructure and access in places that are among the most susceptible to sea level rise. These projects will likely require routine repair as a result of climate-related damage. Additionally, such expansions are likely to prompt new rounds of development in places where such development would put people and businesses in harm's way. We should not be spending millions of dollars to make places that are at elevated risk due to climate change more accessible and more available for development. The list of projects that are questionable from a climate-change standpoint includes Garden State Parkway interchange

improvements in Cape May, Atlantic, and Ocean counties and Turnpike widenings in the Meadowlands. The flood zone remediation project on the Garden State Parkway between Bass River and Mullica River/Great Egg Harbor, involving raising the roadway above the revised 100-year flood plain (at a cost of \$1.4 Billion) provides a preview of the types of expenses that will become necessary in the future if we continue to invest in infrastructure in places that are particularly vulnerable to the negative effects of climate change.

**Extended public engagement.** This capital improvement program represents a significant investment from New Jersey residents. As such, every attempt should be made to encourage meaningful public participation. However, the public process has been compromised by the COVID-19 pandemic and the emergency measures enacted to control its spread. Current conditions do not constitute "business as usual" for soliciting public input. Proceeding with in-person public hearings for the program on the same day that Governor Murphy closed all schools indefinitely and began the restrictions of closing non-essential businesses was unlikely to generate an accurate representation of stakeholders' comments and concerns about the program as people were following the governor's directive to avoid large gatherings. The NJTA should engage in a good-faith effort to solicit comments from all interested stakeholders by extending the deadline for public input in light of present restrictions on in-person meetings.

**Economic impact on individuals and the state.** This capital spending program should not be viewed in a vacuum. It will be important to review the projects, spending priorities and toll increases in light of the current COVID-19 health and growing economic crisis. Is this the best time and way to spend these dollars? Similarly, many people will feel the economic pain of the increased tolls, and the current economic downturn only exacerbates the problem. How will these toll increases affect lower-income individuals and communities that rely on these roads?

This capital spending plan should not move forward until the following six conditions are met:

1. The public has a genuine opportunity to provide feedback on the specific projects as well as the plan in general.
2. Projects that expand highway capacity must be reviewed for their impact on increasing vehicle miles travelled and greenhouse gas emissions and then removed if they are not at least carbon neutral.
3. An explanation provided for how this plan supports a mode-shift toward higher transit use.
4. Projects that serve areas that are highly susceptible to climate change risk and rising sea levels must be reviewed with a longer term cost benefit approach that employs the NJDEP's latest data and guidance on climate change. Projects that don't pass this revised test should be removed from the spending plan.
5. The state has a better understanding of the economic impacts caused by COVID-19 and then determines that a capital program of this size, and toll increases of this magnitude will help New Jersey's economy recover.
6. The toll increases have been analyzed from an equity standpoint to determine if the tolls will disproportionately and dramatically affect individuals and communities with lower incomes and wealth.

Sincerely,

Tim Evans  
Director of Research