



Comments on Global Warming Response Act 80x50 Report

November 13, 2020

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New Jersey Future Comments on the Global Warming Response Act 80x50 Report

Reducing greenhouse gas emissions is a critical issue facing our planet and this Administration has rightfully made it a priority. The transportation sector represents the single largest emitter of greenhouse gases (GHG), accounting for 42% of New Jersey's total GHG emissions as of 2018, according to [New Jersey's Global Warming Response Act 80x50 Report](#). This means that more than two-fifths of our GHG emissions are generated by moving people and things from one place to another.

Our comments will focus on the Transportation section of the GWRA report. The strategies articulated in the report for reducing greenhouse gas emissions from the transportation sector focus largely on electrification with few details provided for other solutions, such as those involving the ways we plan, develop, and preserve our land and invest in transportation infrastructure. This narrow strategy ignores huge opportunities, leans toward a regressive approach that will financially benefit wealthier individuals, and while easy to understand for the average citizen, will be expensive to implement with minimal secondary benefits.

In fact, the report not only recognizes the ancillary benefits of vehicle miles traveled (VMT) reduction such as improved quality of life, but also notes the importance of adopting these measures sooner rather than later in order to achieve immediate GHG reductions. Additionally, these demand-side strategies of reducing vehicle miles traveled have a greater impact on a wider range of people, for less cost, and with more additional societal benefits than the supply-side emphasis on decarbonizing the vehicle miles that we travel.

Despite the urgency presented in the report for adopting VMT reduction efforts, actual strategies for implementation are severely lacking. For example, Transportation Emissions Reduction Pathways 3 and 4 sufficiently describe the benefits of and expected GHG reductions from increasing NJ Transit ridership and expansion of transit villages, and incentivizing work-from-home policies and other strategies, respectively, but neither Pathway provides a strategy to achieve the increases in ridership, expansion of the transit village program, and

increases in people working from home. This is in stark contrast to the detail and specificity offered for every other Transportation Emissions Reduction Pathway. These strategies, which the report deemed important for immediate GHG reductions until electric vehicle infrastructure is built out, will not be adopted without detailed guidance.

The report does a notable job of outlining scenarios and targets for reducing GHG emissions in all other various transportation areas, except VMT. Not only are specific strategies for reducing VMT missing, but there are no VMT reduction metrics or targets presented. Without metrics and targets it will be difficult to prioritize strategies and investments and will be impossible to understand how VMT reductions contribute to the overarching plan to reduce greenhouse gas emissions from the transportation sector.

Additionally, the process of developing specific methods of implementation, as well as the implementation of these policies themselves, will require coordination between many departments. It is notable that the State Planning Commission and the Office of Planning Advocacy, bodies established for the explicit purpose of interdepartmental planning coordination, were not involved in the development of the Transportation section. The noted involvement of New Jersey Department of Transportation and NJ Transit in the development of this section is surprising considering the lack of explicit steps to meeting the goals under their purview. These groups can and should contribute policy and programmatic guidance and ideas for reducing vehicle miles traveled, especially through land use changes and infrastructure investments.

Supply-side solutions, such as electrifying the transportation system, have the benefit of being simplistic to frame and execute. The challenge with demand-side strategies like VMT reduction is that they lack this simplicity and require a bigger vision, planning, and coordination. However, the advantage of this approach is that we can accelerate GHG reductions in a more fair and equitable manner, while improving communities, local economies, and individual health outcomes and in many cases do it in a way that stretches a dollar of investment much further.

It is imperative that reducing vehicle miles traveled be treated with the same weight and urgency as decarbonizing vehicle miles traveled. To this end, we make the following recommendations for re-organizing the transportation section of the GWRA report and for moving forward with implementation.

- 1) Re-organize the transportation section into two categories: 1) Reduce vehicle miles traveled (demand), and 2) Decarbonize vehicle miles traveled (supply). Subgoals, objectives, and actions can be aligned under these overarching goals.
- 2) Convene the relevant state departments under the banner of a task force to develop a statewide strategy for reducing vehicle miles traveled. The State Planning Commission already has most of these departments around the table and could be used to coordinate this effort.
- 3) Develop specific goals and objectives with measurable targets for reducing vehicle miles traveled. Using per capita VMT is one possible measure, another would be GHG emissions per capita per mile.

- 4) Articulate specific strategies for reducing VMT with clear and measurable objectives and with estimated GHG reduction outcomes. Assign ownership of these objectives to specific state departments to develop actions and timelines.

Over the past decade, much work has been done to understand the importance and interconnected benefits of VMT reduction strategies. One of the best and most recent reports is Smart Growth America's [Driving Down Emissions](#). The report notes that government policies and funding decisions that encourage highway growth and sprawl have caused more people to drive farther, resulting in rising emissions despite increasing electric vehicle deployment. Perhaps the most important takeaway of this report is that "we'll never achieve ambitious climate targets or create more livable and equitable communities if we don't find ways to allow people to get around outside of a car." Additional community benefits, such as those emphasised by Governor Murphy's Administration since the signing of Executive Order 23, are described in the report as follows:

Building communities this way also has other negative impacts, such as increased pedestrian fatalities and poor health outcomes caused by dangerous roads. These negative outcomes don't accrue evenly, either: lower-income and communities of color are more likely to suffer from asthma or other respiratory disorders because of where roads are built. Market demand for compact, connected, walkable, mixed-use neighborhoods continues to outpace supply by a very large amount, making those neighborhoods unaffordable to even the middle class, much less those that can't afford a car.

In order to reduce GHG emissions in a way that promotes equity and environmental justice, serious planning to reduce vehicle miles traveled is essential. The Smart Growth America report establishes five goals to organize VMT reductions beneath, which are relevant and instructive for New Jersey:

1. Meet the demand for homes in walkable, compact neighborhoods.
2. Build safer, walkable streets.
3. Set targets for VMT and GHG emissions reductions.
4. Provide transportation options and make transit a priority.
5. Prioritize connecting people to destinations.

These goals can be seen in action in California, where significant work has been underway to establish GHG emissions reduction benchmarks through VMT reduction and develop concrete policies to get there. California Senate Bill 32, passed in 2016, requires California to reduce greenhouse gas emissions 40% below 1990 levels by 2030. The California Air Resources Board determined that it will not be possible to achieve the state's emissions goals without reducing VMT growth, and further found, in its [2018 Progress Report on California's Sustainable Communities and Climate Protection Act](#), that despite the state meeting its 2020 climate goals, "emissions from statewide passenger vehicle travel per capita [have been] increasing and going in the wrong direction," and "California cannot meet its [long-term] climate goals without curbing growth in single-occupancy vehicle activity."

To meet its VMT reduction goals, [California is pursuing both transportation-related and land-use-related strategies](#) aimed at reducing vehicular travel. Transportation-focused strategies include improving transit service, implementing pedestrian and bicycling improvements, and regulatory and pricing strategies to reduce the incentive to drive. Land-use strategies include streamlining development approval for projects near transit, more infill housing, locally-serving retail, and projects that increase the local mix of land-use types.

California SB 743 (passed in 2013) required cities and counties to start estimating VMT impacts of development starting in July of 2020, and in fact the bill has replaced level of service (a measure of vehicular traffic flow estimated using Highway Capacity Manual delay-based methodology) with VMT as the metric by which the transportation impacts of new development are to be evaluated. Local governments are working out the details of how to assess VMT with [guidance from the California Governor's Office of Planning and Research](#).

Decarbonizing vehicle miles traveled plays an important role in achieving GHG emissions reductions from the transportation sector but, as noted in the 80x50 report, it cannot be the only strategy employed. However, as the only strategy in the transportation section that includes enough detail to provide a true pathway forward, it is the only one that will be utilized, and this will be to the detriment of all of New Jersey, but particularly to those in lower-income and communities of color, which are disproportionately impacted by GHG emissions from the transportation sector and are less likely to own personal vehicles. Realigning the state's policies and investment decisions to reduce vehicle miles traveled will complement decarbonizing vehicle miles traveled and dramatically accelerate GHG reductions statewide.