



COMMENTS

Comments on New Jersey Coastal Management Program, Draft Section 309 Assessment and Strategy 2026 to 2030

16 W. Lafayette St.
Trenton, NJ 08608
p: (609) 393-0008
f: (609) 360-8478
w: njfuture.org

By Email to: New Jersey Department of Environmental Protection's Coastal Management Program, NJCZM@dep.nj.gov

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**Contact: Molly Riley, Project Manager - Climate Adaptation
Mriley@Njfuture.org Office: 609-393-0008**

Introduction: New Jersey Future (NJF) submits the following public comments regarding the New Jersey Coastal Management Program Assessment and Strategy 2026 to 2030.

Background: Founded in 1987, NJF is a nonprofit, nonpartisan organization that promotes sensible growth, redevelopment, and infrastructure investments to foster vibrant cities and towns; protect natural lands and waterways; enhance transportation choices; provide access to safe, affordable, and aging-friendly neighborhoods; and fuel a strong economy. NJF does this through original research, innovative policy development, coalition-building, advocacy, and hands-on strategic assistance. Embracing differences and advancing fairness is central to NJF's mission and operations. NJF is firmly committed to pursuing greater justice, equity, diversity, and inclusion through its programs, internal operations, and external communications.

1. Addressing Coastal Hazards and Cumulative Impacts

NJF concurs with the previous stakeholder engagement input included in the CMP's draft assessment, that coastal hazards should be a high-priority enhancement area, given the documented risks associated with flooding, coastal storms, sea level rise, and extreme precipitation, as well as the CMP's updated inclusion of extreme heat as a high-level hazard.

Specifically,

- The assessment clearly documents progress achieved through updated flood protection and stormwater rules, the recently adopted REAL rules, and a broad set of planning, mapping, and technical assistance activities supported by the CMP. These efforts establish a strong foundation for reducing exposure to coastal hazards and guiding development away from high-risk areas.

- The assessment also effectively identifies ongoing cumulative and secondary impacts associated with continued growth in population, housing, and impervious cover as a distinct opportunity for program enhancement. The combined effects of these trends on watersheds, water quality, and coastal resources highlight the need for a more holistic framework to assess, consider, and manage impacts at appropriate watershed and regional scales.

Recommendations:

- We recommend that the CMP strategy prioritize interagency coordination and technical assistance outputs that culminate in a procedural framework that systematically evaluates and advances regulatory refinements aimed toward reducing friction related to implementing the REAL rules and related policies. CMP is well positioned to work across agencies, jurisdictions and stakeholders to clarify ambiguous elements of the REAL rules, address provisions that are unnecessarily difficult or infeasible to implement, and resolve potential conflicts with other state policies.
- Moreover, we urge the CMP to leverage this collaborative process to identify opportunities to streamline regulatory review and permitting for activities such as redevelopment, transit-oriented development, and regional resilience projects. As a targeted Phase II program enhancement, developing recommendations to improve the efficiency and coordination of review/permitting processes would help address implementation barriers and cumulative impacts identified in the assessment. Furthermore, streamlined review and permitting could promote more consistent watershed-scale management and strengthen the effectiveness and alignment of coastal hazard mitigation efforts under the CMP.

2. Local Climate Adaptation Planning

NJF supports the CMP's continued investment in local planning capacity through programs such as *Resilient NJ* and the *Municipal Assistance Program*, along with tools like the *Model Climate Change-Related Hazard Vulnerability Assessment for New Jersey Municipalities*. These technical assistance programs and resources provide a strong foundation for CMP's implementation.

Recommendations:

- As the CMP modernizes the Resilient NJ Local Planning Toolkit, NJF encourages pairing improved usability with stronger mechanisms for evaluating how updated planning resources are used and whether they contribute to measurable resilience outcomes. Developing clearer performance metrics and trend analysis processes would support the Strategy's Evaluation phase and help ensure that modernized tools are effectively informing local decision-making related to coastal hazards.

- Emphasizing implementation-oriented outputs, such as expanded technical assistance, training, and plain-language guidance, would strengthen how modernized planning tools are applied in practice. This focus would help municipalities translate completed assessments into coordinated capital planning, resilience, and redevelopment actions, while improving consistency across local planning processes without duplicating the CMP's existing coastal hazards policies or regulatory strategies.

3. Wetlands Protection and Capacity Building for GSI and NBS

NJF supports the CMP's emphasis on wetland protection, nature-based solutions, and green infrastructure, including research on sediment transport and marsh accretion to identify areas where marshes can build vertically or migrate inland. We also appreciate the CMP's efforts to align program definitions of "nature-based solutions" with the updated Coastal Zone Management rules and to incorporate measurable ecological gains into coastal resilience planning.

Recommendations:

- As a Section 309 program enhancement, NJF recommends that planning and design for green infrastructure and nature-based solution projects more intentionally integrate early and ongoing stakeholder engagement with maintenance planning, workforce capacity considerations, and sustainable funding strategies for long-term operations. Incorporating these elements from the outset would strengthen implementation effectiveness, address recurring operational challenges identified through practice, and reduce the risk of performance degradation over time.
- From a programmatic perspective, stakeholder-informed operations and maintenance planning improves project performance, lowers lifecycle costs, and enhances the reliability of nature-based solutions as a core coastal resilience strategy, consistent with Section 309's objective of strengthening the effectiveness and durability of coastal management programs.

4. Regulatory Structure Alignment to Support Safe Growth

NJF supports the CMP's efforts to align programmatic and agency priorities to encourage growth in areas that are safe from flooding and reduce repetitive losses by leveraging the best available climate science. This approach is consistent with the objectives of the REAL rules, which seek to account for future flood risk, sea level rise, and changing precipitation patterns in land-use and development decisions.

Recommendations:

- Within its planning, coordination, and technical assistance authorities, NJF encourages the CMP to leverage partnerships with non-governmental organizations and research

institutions to support the development and use of measurable, outcome-oriented resilience goals and indicators. While New Jersey has advanced climate resilience through the State Climate Resilience Strategy, Resilient NJ, and NJ PACT, standardized metrics for evaluating the effectiveness of resilience policies and investments over time remain limited.

- Integrating these indicators with hazard exposure and socioeconomic data can improve prioritization of actions that reduce repetitive losses, support safe growth, and advance equitable coastal resilience. The CMP is well-positioned to facilitate the piloting resilience indicators relevant to coastal hazards and encourage their use through CMP program guidance and grant criteria.

5. Addressing Marine Debris

Within the Marine Debris enhancement area, the CMP assessment indicates that marine debris “appears to be decreasing”; however, single-use plastics remain among the most frequently collected debris types, suggesting ongoing challenges and opportunities for program enhancement.

Recommendations:

- Recent steps to establish a formal NJ-based ADV program and dedicated funding represent an important policy development that should be reflected in the CMP’s marine debris assessment.
- We encourage the CMP to refine current marine debris data collection and analysis processes by developing a more comprehensive and holistic trend evaluation process and performance metrics; which could be supported by expanding NGO monitoring partnerships, boosting citizen science efforts, incorporating the use of wildlife rehabilitation data as well as tracking of abandoned derelict vessels (ADV).
- In conjunction with improving marine debris data collection and analysis processes, an additional opportunity for program enhancement is completing a needs assessment that more clearly evaluates connections between New Jersey’s marine debris survey data and relevant state policies and local efforts. This assessment should help clarify how existing policies and programs translate into measurable impacts on marine debris reduction and identify gaps where impacts remain unaddressed.
- Building on this understanding, we encourage the CMP to incorporate preliminary cost-benefit analysis of adopting additional source-reduction approaches, such as extended producer responsibility in states like California, Colorado, Maine, Maryland, Minnesota, Oregon, and Washington, and deposit-return systems, including bottle bills in California, Connecticut, Hawaii, Iowa, Maine, Massachusetts, Michigan, New York, Oregon, and Vermont. Interagency

coordination and stakeholder engagement would support the compilation of technical evidence needed to inform future strategy and policy considerations.

6. Expanding Resilience Funding Resources and Developing an Investment Framework

NJF supports the inclusion of the Resilience Funding Directory as a key accomplishment for addressing capacity gaps identified in the Coastal Hazards and Cumulative and Secondary Impacts assessments. By reducing barriers for municipalities to identify and pursue funding for flood risk reduction and stormwater management projects at appropriate watershed and regional scales, the Directory plays a critical role in advancing local implementation. Continued investment in the Resilience Funding Directory, alongside competitive grant and pass-through funding initiatives, is essential to sustaining progress toward coastal resilience.

Recommendations:

- Through the development of interactive guidance and modules, NJF encourages the CMP to consider advancing practical, risk-informed planning frameworks that help municipalities distinguish where development should be encouraged, where risks can be mitigated through adaptation, and where conditions warrant a transition away from intensive development. Incorporating such frameworks into the Toolkit would support more consistent and transparent application of climate risk considerations across local plans and CMP-funded projects.
- As part of Phase II implementation, NJF encourages the CMP to include a structured process for evaluating the viability of additional resilience financing approaches at the local, county, and statewide levels, including resilience bonds. This evaluation should consider near-term feasibility as well as longer-term options that may require legislative action and, where applicable, voter approval. Incorporating this analysis into the Strategy would complement the modernization of local planning resources by helping municipalities understand how locally driven projects can align with regional and statewide funding mechanisms to advance priority resilience investments.
 - Resilience bonds could help address critical implementation gaps by supporting the upfront feasibility studies required to establish local or regional stormwater utilities, which can serve as stable, dedicated, long-term funding mechanisms. In turn, these utilities could create incentives for property owners to implement green infrastructure and nature-based solutions and, where authorized, contribute to repayment of bond debt associated with major stormwater management projects or related feasibility studies.
- NJF encourages the CMP to consider how modernized planning resources could help local governments evaluate the insurance implications of resilience investments, including impacts on NFIP participation, Community Rating System outcomes, and private insurance availability. Aligning hazard mitigation guidance with insurance

considerations would support more informed local decision-making, enhance risk communication, and help stabilize long-term costs for households and municipalities.

Conclusion

New Jersey Future appreciates the opportunity to review and provide comments on the Draft Section 309 Assessment & Strategy for 2026–2030 and the CMP's continued leadership on coastal resilience. We encourage the CMP to build on this strong foundation by prioritizing implementation-focused program enhancements, including early maintenance and operations planning, strengthened coordination around sustainable funding approaches, and continued support for nature-based solutions and pollution reduction. Advancing these efforts through the Section 309 process will help ensure that resilience investments are effective, durable, and deliver long-term benefits for New Jersey