

Supplement to NJDOT Comments on September 18, 2020 PACT Rulemaking Meeting

How do environmental issues figure into your resiliency strategies?

In our resiliency efforts, environmental issues related to potential for flooding, both in coastal and inland areas, are of prime importance. Tools are under development to identify areas exposed to flooding based on predicted sea level rise and inundation levels from increased precipitation and storm events. Resiliency of other factors such as threatened and endangered species, riparian zones, or wetlands are not being assessed; however, in addressing resiliency in NJDOT actions, avoidance and minimization of impacts to these valuable resources are always followed. If impacts do occur, the NJDOT is willing to assess the feasibility and practicality of nature-based solutions as mitigation measures, and is more than willing to assist in the preservation of existing wetlands through monetary contributions, when appropriate. Finally, we are, however, incorporating the identification of underserved, minority communities that may be challenged in their ability to be resilient to climate change as well as identifying system linkages that serve minority populations that may be subject to impacts associated with climate change.

The existing regulations could have a significant impact on our resiliency strategy. For example, if the resiliency strategy results in the disturbance of a 300-foot riparian zone and 95% TSS removal for the area that is proposed to be disturbed in order to increase resiliency, it will make compliance much more cumbersome.