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www.EnvironmentAmerica.org

To: New Jersey Board of Public Utilities

Environment America is a national non-profit advocacy organization with 29 state affiliates including Environment New Jersey working for clean air, clean water, and open spaces.

To get to 100% clean energy as soon as possible, New Jersey will have to take into account all sectors, especially transportation. New Jersey is one of the [fastest-warming states](#) in the nation, and our cars, trucks, and buses account for nearly half of all greenhouse gas emissions in the Garden State. In the most densely populated state in the country, we suffer from some of the worst regional air pollution.

New Jersey traffic congestion ranks within the top ten worst of the country—and with that comes lowered air quality and massive amounts of fossil fuels used to transport our state's significant population of commuters around the region.

Hotter weather due to climate change creates more days with the hot, sunny conditions that lead to smog formation. A recent joint analysis from Climate Central and The Star-Ledger linked climate change to exacerbating the number of ozone alert days and predicted the number of ozone alert days would double by 2050 because of rising temperatures. Ozone attacks the lungs and is especially dangerous for the [1 million New Jerseyans](#) with asthma or COPD. According to the American Lung Association State of the Air [2019 report](#), a majority of our counties failed for ozone pollution.

We are pleased that this is the state's first Energy Master Plan that addresses transportation head on, because that is our next big hurdle to overcome. We can improve public health and reduce global warming pollution if we can put more zero-emission cars and trucks on the road.

If we want to reach our Global Warming Reduction Act targets in 2050, we need to ensure [all new car sales are electric by 2035](#). [Light-duty vehicles stay on the road an average of 11 years](#); therefore, to get to a fleet of zero emission cars by 2050, we need all new passenger cars and light-duty trucks to be electric by 2035 at the latest. This will help us achieve maximum transportation electrification.

Electric car sales are growing exponentially thanks to financial incentives and the ZEV mandate. To prepare for 330,000 EVs on the road by 2025, we need to modernize the grid and install a larger network of charging stations in our downtowns and along major roads and highways. More electric vehicles mean savings for all New Jersey ratepayers. The ability to manage how EV charging occurs, especially in the residential setting, will



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be crucial to reducing peak demand in addition to bringing many other benefits to our energy system and to ratepayers.

Though electricity demand will increase with more electric cars on the road, the EMP overlooks the opportunities to reduce Vehicle Miles Traveled and have more efficient energy usage in our cars. Electric vehicles use less energy than gas-powered cars to get people where they need to go. In our cities, we have the opportunity to reduce vehicle miles traveled by providing people more options for walking, biking, and public transit.

The Volkswagen settlement also provides New Jersey with the perfect opportunity to fund projects that will cut carbon pollution by electrifying our cars, trucks and buses. One big winner is Trenton, which will receive five electric school buses to help reduce the diesel pollution that is harming our children's health and contributing excessively to global warming.

Electrified medium- and heavy-duty vehicles like electric garbage trucks are on their way to our communities too, and we shouldn't be afraid of the progress we can make with seemingly tougher to electrify technology. In transitioning to a cleaner electric fleet, combined natural gas medium- and heavy-duty vehicles would represent a missed opportunity to make a rapid and full transition to zero-emission vehicles--these technologies should not be included in the plan.

The EMP should direct NJ Transit to transition to all-electric buses by 2040, with [no more non-EV buses purchased by 2030](#). Many communities lack reliable access to public transportation, so expanding service, developing new routes, and creating programs like electric ride or car sharing should be prioritized. We are also supportive of a dedicated source for transit funding, and the state should consider financial incentives for bus operators to go electric.

Electric vehicles can also help us electrify the building sector. Where a company or municipality has a fleet of trucks or cars, they become an extension of the building's energy management system – taking electricity or delivering electricity at opportune times. School buses that would normally sit idly in the summertime will have batteries that can work as an energy asset for a building during times when electricity is more expensive.

The EMP should also establish a goal to [double the number of people who travel on foot, bike, or public transit by 2030](#). The cleanest car is the one not driven, so we are supportive of improving public transit & building safer streets for walking and biking.



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The Transportation and Climate Initiative should be referenced more in the EMP and can also help accelerate clean transportation solutions and ratchet down pollution. As the policy is designed, New Jersey should push for an aggressive descending cap on transportation emissions that incorporates all transportation fuels. Auction revenue should be reinvested in programs to reduce carbon pollution from the transportation sector and limit any impacts the program may have on the most vulnerable. Investments could include zero-emission vehicles, expanding public transit, incentivizing shared transportation like carpooling and vanpooling, investing in transportation demand management, bike paths, sidewalks, electric vehicle charging, and incentives for local governments to incorporate smart growth. TCI funds should not support highway expansion and conventional road maintenance criteria that have been paid for by the gas tax, because expanding highways does not solve congestion or address our long-term transportation challenges.

The bottom line is climate change is already impacting New Jerseyans and the EMP should make transforming and electrifying our transportation system a top priority.

Sincerely,

Morgan Folger
Clean Cars Campaign Director
Environment America