**Unitarian Universalist Faith Action NJ, Environmental Justice Task Force**

**Comments on Strategic Climate Action Plan**

**Submitted to DEP 10/19/23**

Unitarian Universalist FaithAction NJ (UUFANJ) is a faith-based organization. The Environmental Justice Task Force addresses environmental issues at the state-wide level, especially those that affect environmental justice. This is in line with Unitarian Universalist principles of the inherent worth and dignity of every person; justice equity, and compassion in human relations; and respect for the interdependent web of all existence.

We thank the staff of the Department of Environmental Protection for their hard work in addressing environmental problems, most especially the impacts of climate change. We also applaud their willingness to listen to all comers at their many hearings We offer the comments below mostly in support of this Draft Strategic Climate Action Plan, with requests for some enhancements and clarification.

Overall, we strongly support the emphasis on marginalized and overburdened communities that is considered throughout the document. We believe that reducing emissions by 80% by 2050 is not enough, it needs to be 100% by 2035. We are already feeling increasing impacts of climate change and our response needs to be up to the challenge.

**4.2.4.3 Support Exploration of Complementary Reductions in VMT**– We encourage the transition to Electric Vehicles but are particularly interested in reduction of vehicle miles traveled as the principal way to reduce GHG emissions. As stated in the report we learned during the COVID pandemic that many jobs can be performed productively without the typical daily commute. In addition to promoting “transit villages” we suggest incentivizing the development of local “office hubs”, where people can walk or bike less than a few miles and enjoy shared office equipment and where they can socialize with other workers thus reducing the negative impacts of isolation that some people feel when working from home.

We suggest that walking and biking should be emphasized and become a significant portion of our basic approach to transportation, representing 40% of all transportation with public transit representing another 40% and automobiles making up the remaining 20%.

**4.2.5 Energy Transition**: We are very supportive of expanding solar and off shore wind capabilities, and praise the administration for promoting the OSW goal of 11MW. However, we are discouraged that the disinformation campaigns waged by the opponents of off shore wind have had such a huge impact on public opinion and threaten to slow down implementation. We suggest DEP fund a large-scale public information ad campaign to present facts at a scale that reaches the general public.

An important part of our overall energy transition needs to be a serious and permanent reduction in the overall energy that we use for all purposes combined. Once the energy transition has taken place we visualize a society in New Jersey that can accomplish the equivalent outcomes such as heating, cooling, transport, lighting, technology and communications as was performed in 2019 with a mix of fuels with only 50% of the equivalent energy. However, that total level of energy would come from 100% renewable-sustainable-regenerative energy rather than the old mix of the past. We call upon DEP and the State government to see this as a massive economic and social opportunity that will make New Jersey a leader and source for innovation and opportunities that can serve people and our communities.

**4.2.5.1 Support Solar Development Through Improved Siting Guidance & Policy.** We support the implementation of solar projects wherever feasible, that does not include tree removals or damage to natural habitats, and suggest working with DOT to analyze the use of greenway strip along the edge of highways for solar panels.

Warehouses also seem like a perfect location for large rooftop solar installations. We suggest either mandating that warehouses not only be “solar ready” but have solar installed in order to operate their business. In the event that warehouse owners don’t want to install solar themselves, warehouse owners should have the obligation to transfer solar development rights to other businesses who will. Transfer of solar development rights (TDSR) would compensate the warehouse owners while preserving and utilizing the rooftop resource for the benefit of all New Jerseyans and the planet.

**5.2.3.3 Increase Tree Equity**: We are very supportive of the multiple areas where the plan points to Urban Tree Planting and maintenance as a priority and the recognition of the impact of urban trees on heat. We suggest that tree planting projects be encouraged to include removal of impervious surfaces such as concrete and asphalt, which also amplify heat, wherever feasible.

**5.2.3.8 One Health** We were surprised that the severe impacts of climate induced heat on agriculture in general and migrant farm workers in particular was not included and suggest that a section be added to address that issue. A recent NJ Spotlight article pointed out that as temperatures rise, heat related deaths also rise, and most of those in danger are outdoor workers. Outdoor workers need to be made aware of the threats to their health, and even be taught to recognize the symptoms of overheating and heat stroke and how to prevent it.

**6.2.3 EXPAND FOREST PROTECTION THROUGH SCIENCE-BASED MANAGEMENT TECHNIQUES** We encourage Forest Management programs that minimize timber cutting and maximize forest reserve areas. We support allowing intact middle-aged forests continue to mature into old-growth where they will store large amounts of carbon.

**7.1 THOUGHT LEADERSHIP / Climate Equity**: The DEP has developed many useful tools, such as the EJ Map and Air Quality Mapping to help the public understand our environmental issues. Providing understandable and usable information about issues involving climate change and protecting the environment can impact individual behavior. Changing individual behavior can’t be the entire solution, but consumption is the most important factor driving our economy and must be addressed

Please clarify the definition of OBC, which according to the Environmental Justice Mapping website should state that only one of the three condition needs to be met.

**8.2.11 PROVIDE SUPPORT TO EDUCATORS, SCHOOLS &COMMUNITIES FOR STATEWIDE IMPLEMENTATION OF THE K-12 CLIMATE CHANGE EDUCATIONAL STANDARDS**

Ensure that the members of New Jersey Commission on Environmental Education be appointed and filled as set forth in 2013 New Jersey Revised Statutes Title 18A – EDUCATION Section 18A:6-91.1 – New Jersey Commission on Environmental Education.

Ensure that the Climate change education program, as a cross cutting program for multiple subjects, is updated on a cyclical basis along with the subject areas being reviewed by NJ DOE that year.

**9.2.1 REIMAGINE SUSTAINABLE WASTE MANAGEMENT:** Our society produces enough waste to drown and suffocate us all. We must find ways to manage it. One approach not mentioned in the plan is to reduce consumption, including of unnecessary packaging and inessential items. This would appear to be outside the scope of the DEP’s mandate, but helping consumers to understand the impact of their choices may improve the situation.

We should also consider how to manage the waste produced by renewable energy, e.g. solar panels, wind turbine blades, and batteries. Since these industries are new, we should be able to impact the management of waste more easily than in long-established industries with ingrained habits of disposal.

**10.2.1 Continue the Community Collaborative Initiative (CCI) Involvement with Local Community Members:** The DEP deserves a lot of praise for the Community Collaborative Initiative, and should continue it at a higher funding level.