March 13, 2025

To: Members of the New Jersey State Planning Commission and staff

Re: Comment on the Draft Preliminary State Plan: Call for a Framework for Adapting to Climate Change

Dear Members of the State Planning Commission,

We, the undersigned, ask the Commission to directly address the need for the state of New Jersey to incorporate future climate-related threats into fundamental questions about where the state should and should not develop or redevelop in the future, and how best to protect existing development from these threats.

An estimated 1.7 million New Jersey residents, or 19% of the population, live in areas that are now or are projected to be at risk from coastal flooding or inland flooding or both, based on the overlap between the state's already-developed lands and the map layers representing areas subject to the Department of Environmental Protection's (DEP) 2023 Inland Flood Protection Rule (the NJ Inland Design Flood Elevation layer) and its proposed 2024 Resilient Environments and Landscapes (REAL) rules (the Climate Adjusted Flood Elevation layer).

The process of updating the New Jersey State Development and Redevelopment Plan (State Plan) is an opportunity for state government leaders to address the need for clarity on which parts of the state are at the greatest risk from the present and future effects of climate change, particularly flooding, and take steps to prevent further development from happening there unless protective measures are to be taken. The draft Plan already speaks in numerous places about the need to avoid steering future development into areas that we know are presently, or will be in the foreseeable future, at risk from flooding.

State government leaders will also need to formulate strategies for lands within the coastal and inland flood zones that are already developed, so as to plan how best to protect residents and businesses already inhabiting these areas. The state planning process should provide a framework for determining which areas are most appropriate for which of the following broad approaches:

- **Better stormwater management**: In some built-up inland areas, flood risk can be mitigated via improvements to drainage system capacity, in places where that is the limiting factor. Small-scale actions such as the installation or widening of culverts; green infrastructure measures; detention basins; removal of impervious cover; and other stormwater retrofit projects can reduce the likelihood and severity of flooding, thereby alleviating the need for additional protective measures. As a bonus, green infrastructure techniques like bioswales and street trees can help improve air quality and reduce heat-island effects, both of which pose health threats to residents both within and outside the flood zones.

- **Adaptive building standards**: In places where large-scale protective measures are not cost-effective, adaptive building standards like raised building heights and breakaway walls on the ground floor can offer some mitigation against risks to life and property, provided that the infrastructure serving these areas is also resilient.
- **Fortification and large-scale hardening measures** like floodwalls, levees, and dunes—designed to keep water out—can effectively protect residents and businesses from flooding if enough development is concentrated in the risk areas to keep the per-capita costs of constructing the barriers low enough. Similarly, restoring wetlands (and conserving existing ones) helps flood-prone areas to fortify, since wetlands act as a sponge to absorb and slow floodwaters, as well as buffer coastal communities from storm surges.
- **Managed retreat**: Finally, in places where fortification is not cost-effective and where adaptive measures are too burdensome, whether financially or from a lifestyle standpoint (as with older residents having to climb stairs into elevated buildings, for example), plans and timeframes for the coordinated relocation of residents and businesses will need to be considered. In the short term, the state and federal government can expand buyout programs like New Jersey's Blue Acres, but additional longer-term solutions will also be necessary.

We urge the Commissioners to strengthen the proposed update to the State Plan by including a call for the development of a geographic climate adaptation framework that identifies the geographic areas that are appropriate for each adaptation strategy.

While such a framework does not yet exist and is not likely to be completed in time for inclusion in the final version of the State Plan, the text of the draft Plan's section on Climate Change should nonetheless be amended to include a call for the State Planning Commission to work with relevant state agencies to create the framework. The Commission should make this one of its first implementation actions, post-adoption. Considering the hardships that climate change will impose, particular attention should be paid to assisting under-resourced communities that are not well-equipped to adapt to the risks on their own.

Signed,

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