



# Environmental Justice Task Force

## Comments on Clean and Reliable Transportation

### About UU Faith Action NJ

As a faith-based group, Unitarian Universalist Faith Action addresses issues of equality and social justice, in line with our first and second principles, “The inherent worth and dignity of every person” and “Justice, equity, and compassion in human relations.” In addition, our seventh principle, “Respect for the interdependent web of all existence of which we are a part,” motivates us to work to care for our environment. In line with these principles, we are concerned with promoting access to renewable energy and to equal access for low and minority income households.

### Executive Summary

The recent IPCC report makes it clear that New Jersey needs an immediate moratorium on building more fossil fuel infrastructure.

A crucial issue for low- and moderate-income (LMI) communities is jobs. Infrastructure projects should include jobs and job training for LMI individuals. When building clean energy projects, it may be useful to put them in LMI communities to support access to jobs. However, potential harmful side-effects to those communities should be addressed.

A second issue is cost of energy. The transition to renewable energy may increase costs in the short term, making it more difficult for LMI communities to take part. Also, there may be subtle side-effects to mechanisms for funding the transition that further disadvantage already disadvantaged communities. For example, everyone pays the Societal Benefits Charge but rebates and tax incentives are only accessible to the wealthy. Furthermore, there may be limited access to the information required to evaluate the benefits of transitioning personally. The state should give considerable thought to education of consumers and marketing of clean energy products.

A third issue is public health. Power plants and diesel vehicles have polluted surrounding neighborhoods, which are disproportionately LMI communities. The incidence of pulmonary and cardiovascular problems related to particulate matter in the air is especially high in these communities. This adds to the urgency of transitioning to clean energy.

# Questions

We only answer some of the questions. The question numbers correspond to those in the discussion points document; we omitted the questions we didn't answer.

## General

1. What are the intermediate timeframes and pathways to new or enhanced clean transportation systems? What clean and reliable transportation goals should be set for 2030 and 2050?

Achieving clean and reliable transportation requires additional capacity on the rail lines to New York City. Rail is the cleanest way to travel, so we need to encourage its use.

By 2026, or by 2030 if it takes longer for funds to be appropriated, selected features of the Gateway Program (originally Gateway Project) should be complete. The planned phased expansion and renovation of the Northeast Corridor (NEC) rail line between Newark, New Jersey, and New York City, New York, must be done in a manner that is affordable and allows for future regional rail development. Portal Bridge replacement should start with 3 rail lines, with room for a fourth as funding becomes available. The tunnel and New York Penn portion of the project should be scaled to ensure that we repair and build useful tunnels now. The new Moynihan Center under the James Farley Post Office should have connections to all Penn Station platforms, including platforms 1 through 4, which are used by NJ Transit and need to be extended to the new area. All parts of the system must be accessible to all riders.

3. What is the role of clean transportation in freight movement? What should the State do to promote low-carbon freight/goods movement?

Freight by rail is more efficient/cleaner than freight by truck; in the past, rail lines have gone directly to warehouse locations, we should look at restoring such capacity. It is particularly important to facilitate the conversion of diesel trucks to electricity; we need the Port Authority to ensure that this is done by trucking companies, not by individual drivers who are often mischaracterized as independent contractors by companies looking to escape costly obligations that are critical for the public health.

## State Policy

5. What are the regulatory or statutory barriers to the expansion of low- and zero-emission vehicles?

Tax incentives, or the lack thereof. We suggest reducing or eliminating the sales tax on such vehicles.

6. What are the clean fuel transportation approaches the State should consider to achieve its zero emission vehicle (ZEV) goals of 330,000 ZEVs on the road by 2025?

- Increased incentives for charging stations, particularly in centralized locations, e.g., motels, corporate workplaces, or shopping centers & malls. Consider allowing owners of charging stations to collect minimal fees for charging, similar to the way that people now in many places pay for air for their tires. The incentives need to prioritize charging facilities that are compatible with mid-level models of cars, not just high end vehicles.
- Offer incentives for carpooling, van pooling, work-from-home, and co-working spaces, to reduce the number of vehicles on the roads (the cleanest energy is no energy).

7. What actions can the state take with its own fleet to demonstrate clean transportation leadership? How would these actions affect service reliability?

- As new vehicles are needed, replace with electric or fuel cell.
- Limit the number of vehicles purchased and used.
- Provide multiple charging stations at every DOT maintenance yard, the way there are now gas and diesel pumps.

8. What strategic incentives should be considered for encouraging the adoption of zero emission vehicles, plug in hybrids, and other low emission and clean fuel transportation?

- Rebates for purchase of these vehicles. In California, there are rebates for retiring fossil fuel vehicles; rebates for clean fuel vehicles; and a rebate to low-income families for fuel cell vehicles.
- Mandate designated parking spaces for such vehicles, similar to handicapped parking spaces, at convenient locations in parking lots.
- Reduce the sales tax on purchase of such vehicles.
- Promote hydrogen fueled vehicles.

9. What best practices can the state adopt from other states and local governments that have advanced clean transportation goals?

California provides an easy-to-use listing of national, state, and local savings options at [https://www.driveclean.ca.gov/Calculate\\_Savings/Incentives.php](https://www.driveclean.ca.gov/Calculate_Savings/Incentives.php).

10. What actions can the state take to help promote clean and reliable transportation at the state's ports?

While recognizing that our ports are major engines driving the economy in NJ, we are particularly concerned that little attention is paid to the air quality, safety, and working conditions of the workers, such as container box tractor trailer drivers and nearby residents. These communities are traditionally overburdened by emissions and truck traffic; workers in these industries often are not paid living wages and benefits and do not have the right to organize; in addition workplaces are often unsafe. Diesel truck engines should be required to meet current standards, and trucking companies, not individual drivers, should be expected to pay for the conversion or replacement. In addition, engines must be turned off when their drivers are waiting for directions and safe waiting areas must be provided for those drivers. These trucks, just like school buses and cars, are subject to the state's 3-minute idling law, which is particularly important to enforce in congested areas such as ports and city centers.

11. What role should utilities play in clean transportation?

Electric Utilities need to invest in charging stations in a way that would enable them to get a fair return on their investment, with rates set to treat initial capital costs of infrastructure differently than recurring cost of maintenance and electric supply. We encourage the utilities to make a reasonable request for a rate structure that works for all.

## Technological Advancements

12. What existing and emerging technologies need to be incorporated into future transportation planning?

We should support in-state research into energy-storage options and into emerging technologies such as hydrogen.

13. How can the State best encourage research and development of new technologies?

- Independent, government-funded research could be done by N.J. public and private colleges and universities.
- Continue to encourage innovative efforts such as Mike Strizki's Hydrogen House Project, a non-profit organization dedicated to education and the pursuit of clean and renewable energy technologies, Strizki converted his home in 2006 to run exclusively on solar and hydrogen power, supported in part by a grant from the BPU.
- Provide start-up funds for entrepreneurs in the clean-energy sector, which could include low-interest loans, grants, or in-kind contributions.
- NJDOE could encourage technical-vocational high schools and community colleges to adapt existing and develop new relevant curricula. In fact, this is being done by the Department of Education in conjunction with New Jersey Transit to develop a training program for rail engineers. Ongoing consultation should encourage new curricula as technologies develop.

14. How could new technology impact infrastructure investment?

We should be investing in infrastructure that accommodates up-to-date, forward-looking technology, renovating as needed. This could include information kiosks at busy bus stations and rail stations, charging stations at locations at which people are likely to park for an extended period (workplaces, schools, hotels, etc.).

## Infrastructure Investment

15. What infrastructure investments, policies, and procedures are needed to support the future of clean transportation in the state? What infrastructure needs will the state have in the promotion of clean and alternative fuel vehicles?

- Invest in trial projects of new battery, fuel cell, and other energy technologies.
- As soon as new EV or fuel cell technology appears safe and reliable, NJ should make every effort to ensure that it is installed widely. NJ Transit can do a lot to acquire and demonstrate efficient public transit—e.g., hydrogen-powered mini-buses. Smaller buses and vans on routes with fewer passengers can quickly provide improvements in air quality and fuel efficiency.
- Study where charging stations are needed and then build a network of charging stations. Landlords should be required to put charging stations in multi-family dwellings.
- Develop an extensive rail network, with previously-abandoned lines and rights-of-way restored for rail-passenger service and with trains running frequently on every line, so that passengers are accommodated and space is available for freight movements, too. This would require a significantly expanded rail network (with as many lines electrified as possible), which our region had during the previous century, and with more frequent service than is offered now. We also need light-rail and bus networks that would provide connectivity for shorter trips, including the “first” and “last mile” of linked trips.
- Invest in smaller passenger buses for low volume routes. Smaller buses should be more efficient energy users, and might be able to run more frequently and reliably. Develop “Call-A-Ride and similar on demand systems to extend the viable service area by providing connectivity to rail and bus lines.

16. What clean transportation funding mechanisms should the state explore? What type of financial planning and programming should be considered?

Make greater use of the Transportation Trust Fund to improve reliability of existing NJ Transit services, before asking passengers to pay more. One way to make passenger contributions less burdensome is through A2425, the current legislative bill mandating a pretax transportation benefit,

## Reliability and Security

18. What is the effect of increasing alternative fuel vehicle adoption on energy generation and the utility distribution system? What role should utilities play?

While widespread adoption of EVs would increase the load on the grid, plug-in vehicles can also help with managing Distributed Energy Resources. Because they will usually be charged at night, they do not add to peak demand, but even out the energy use throughout the day. They actually can serve as a storage system for excess energy that can return energy to the grid at times of peak demand. This might enable us to close one or more dirty “peaker plants”, helping to make energy generation and utilities cleaner overall.

Widespread adoption of electrical vehicles will also provide the utilities with additional revenues to make up what is lost from energy efficiency measures.

20. What strategies can NJ TRANSIT develop (infrastructure, facilities, vehicles, labor, workforce, training, etc.) to implement clean transportation (buses, paratransit and rail) by 2030 and 2050 while maintaining reliability?

- Encourage use of public transportation by better marketing and improved reliability—a major issue right now.
- Work on “first-/last-mile” solutions; people are rarely willing to walk more than 0.25 mile, or 0.5 mile at most, to get to a bus or train.
- Create subscription-based shuttles (electric!) to train stations from local pick-up points.
- Off-peak fares: Until 2010, NJ Transit offered rail fares outside peak-commuting hours that were discounted enough to encourage price-sensitive riders to take the train when there is sufficient capacity for them (such discounts are still offered on New York's LIRR and Metro-North). We call for these “off-peak” fares to be restored with enough “off-peak” service to be convenient for riders (every 30 minutes or more frequently). The availability of these trains helps make the system work even for commuters, who often are called home unexpectedly, and running them as full as possible, rather than with fewer full-fare riders, is ultimately more profitable overall. Like theatre tickets, they are time-limited, so better to have more sales at a discount than to let seats go unpaid. It should go without saying that in the short term we need #FullRestorationInJanuary when PTC installation is complete.

## **Economic Growth and Workforce Development**

21. What new industries will be needed to meet clean transportation goals? What new jobs and training will be needed to meet the demands of these industries?

There will be lots of new jobs for people to service new types of vehicles, and for electricians and plumbers for Photovoltaic to Hydrogen storage.

22. What is the impact of changes in transportation on the mobility of the workforce?

We should consider the flip side of this. As the needs of the workforce change, we will need to change transportation. Here are some predictable changes:

- Work-from-home options (telecommuting).
- Flextime, spreading the demand and reducing peak traffic loads (both highway and grid).
- Co-working and incubator workspaces.

24. What are possible public-private partnerships in transportation innovation and what do they look like?

Companies with a large number of employees in a single location could contribute to shuttles from train/bus. These could also be used by non-employees (possibly for a fee, although even better as a public contribution to the community, as a means of lowering traffic impact and being seen as an asset to, rather than a drain on, the neighborhood). This would ensure more robust local transportation requiring fewer cars. To be successful, such a program needs a fairly long start-up time, advertising, and consistency, including a commitment from both company and NJ Transit or other transit provider to continue the program even as it may be slow to gather customers. The bill currently in the state legislature (A2425/S1567) that would mandate pretax transportation benefits, including transit fares, would give employers of 20 or more workers a role in limiting the environmental and congestion damage of transportation, and might tie into such a local shuttle system.



## Environmental Justice

26. What efforts are most successful towards making clean energy measures and zero emission vehicles affordable and accessible to all?

- First, and most important, clean-energy measures must actually save money for low- and moderate-income households. People who are struggling to pay their bills can't spend extra to save the planet. In the short term, this may require subsidies unless the efforts are very carefully planned.
- Up-front discounts and on-bill credits are generally necessary for low-income individuals and households, who often are not be able to take advantage of a tax credit and do not have money to put out in anticipation of a later refund. Tax credits or rebates can work for higher income households.

27. How can the state play a role in ensuring that disproportionately impacted communities receive opportunities and benefits connected to the clean energy economy and expansion of low and zero emission vehicles?

- Communities, including those that are near port facilities and consequently currently disproportionately impacted, would benefit from electrification of truck traffic.
- All communities would benefit from cleaner buses and from first-/last-mile electric shuttles (though these are likely less needed in urban areas).
- Electrically-powered motor vehicles are expected to constitute some improvement over gasoline or diesel engines, particularly eliminating particulates that cause asthma and other respiratory diseases; this makes it especially important to facilitate the conversion of diesel trucks to electricity. We need the Port Authority to ensure that this is done by trucking companies, not by individual drivers who are often mischaracterized as independent contractors by companies looking to shift costly obligations.
- Improved public transit can provide better access to jobs.