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Mr. David Rosenblatt, Chief Resilience Officer
Vice-Chair, Interagency Council on Climate Resilience
Assistant Commissioner for Climate & Flood Resilience
Department of Environmental Protection
P.O. Box 402
Trenton, NJ 08625

Dear Mr. Rosenblatt:

I am offering these comments to New Jersey's Draft Climate Change Resilience Strategy on behalf of the New Jersey Business & Industry Association. NJBIA is the nation's largest statewide business association whose members employ about one million people in the State of New Jersey.

NJBIA recognizes that climate change poses a growing threat to our coastal state and that with its low lying coastal plain we are especially vulnerable to storms and sea level rise. We thus applaud the Department for undertaking an effort to raise the profile of being resilient in response to climate threats and for taking the initial steps in setting forth a policy direction. We agree with many of the early recommendations in the draft strategy, especially in using nature-based solutions to mitigate against potential harm. We also think it is important to coordinate government actions and policies. We learned from Superstorm Sandy that allowing one town to lack sufficient beach and dune protections jeopardizes every town around it.

We are also generally supportive of providing public information and encouraging engagement of citizens. However, we need to avoid ideologically driven policy statements disguised as scientific fact. It is just as important to tell the public what we do not know, as it is to tell them what we do know. We should not be afraid to express uncertainty and we must always be truthful.

We also generally support promoting climate-informed investments to ensure our public monies are spent wisely and in the most effective manner. We do believe, however, that the state should take a greater role in providing resiliency funding. The needs are often too great for local governments to afford, and this is precisely why state government should have a leading role.

I want to focus our comments, however, on Priority 6: Coastal Resiliency Plan. The assumptions used in this chapter, and actually throughout the report, on sea level rise and how they impact every other decision contained in the resiliency strategy. The assumption the Department uses on future sea level rise is crucial. It is as important, if not more important, than any strategy contemplated.

Assumptions on sea level rise will impact economic decisions and outcomes today as flood hazard regulations will be changed to reflect those assumptions. It will impact decisions on

shore protection structures and feasibility, as well as cost benefit. Whether you are planning to protect a population from a 1-foot sea level rise as opposed to a 5-foot rise will determine how big a dune must be, how wide a beach must be, and whether such engineering is structurally feasible or cost-effective. Choosing a 5-foot standard will mean fewer shore protection projects will actually happen. The result will leave more coastal communities vulnerable to the storms and climate impacts that the strategy is intended to protect against.

The selection of 5-foot sea level rise standard will also drive the policies on retreat. We may very well be able to protect ourselves from a 1-foot or even 2-foot sea level rise, and do so economically, but a 5-foot sea level rise projection may make it physically impossible and fiscally imprudent to prepare for in a resiliency strategy. The mere fact that a 5-foot sea level rise is used as a planning and regulatory tool may itself be the impetus for retreat. It becomes a self-fulfilling prophesy. Set a standard that can't be met, regulate to that standard, drive fear of that standard, don't provide protections because of that standard, and people will no doubt abandon their homes and communities and retreat. Even if they don't retreat voluntarily, the policies put in place due to that standard will prevent otherwise feasible resiliency projects from being built, thus making living in many areas difficult.

The assumption of a 5-foot sea level rise by the Department will force a retreat from coastal communities not because elevated sea levels make it impossible to live in those areas, but because that assumption will drive policies that drive the outcome.

What makes this assumption all the worse is that it is not based on the latest science. We have previously stated our objection to the use of the Rutgers report ("New Jersey's Rising Seas and Changing Coastal Storms: Report of the 2019 Science and Technical Advisory Panel") as the sole basis for both this resiliency strategy and the contemplated PACT regulatory changes. We submitted a [report](#) prepared by the Climate Forecast Applications Network that made that case. We are resubmitting that report as part of our official comments on the resiliency strategy.

Now, two major reports that were published in the scientific journal Nature further pull back on assumptions on high sea level rise projections based on moderate emission scenarios. The Department cannot continue to ignore the latest science in an effort to drive people away from coastal areas. Given the enormous implications of the Department's policies based solely on this one, older, non-peer reviewed, outlier STAP report, we ask that the Department look at other authoritative sources for sea level rise projections, wait until the Intergovernmental Panel on Climate Change comes out with their projections next year, or ask Rutgers to reevaluate its 2019 findings in light of recent published scientific studies. We also ask that you specifically ask the Rutgers STAP team if their projections of a 5-foot sea level rise should be used as a basis for both a resiliency strategy and a regulatory standard. Do they recommend retreating from our coastal communities based on their projections?

We believe the Department should take a more measured approach by using a 1-foot to 2-foot sea level rise projection, which is consistent with most climate science studies using a moderate emissions scenario and make adjustments as needed based on actual measurements over time. We note that according to one of the authors of the STAP report,

Bob Kopp, projections of sea level rise are an area of “deep uncertainty.” We also note that the STAP report’s projections to 2030, just nine years from now, are falling far short of even their lowest end projections. If that report cannot even accurately project sea level rise nine years out, how can it be the basis for major policy decisions based on an 80-year projection?

Thank you for the opportunity to comment on the draft strategy.

A handwritten signature in black ink, appearing to read "Ray Cantor", with a long horizontal flourish extending to the right.

Ray Cantor
Vice President of Government Affairs
New Jersey Business & Industry Association