# Comments on: New Jersey Board of Public Utilities Establishment of an Urban Heat Island ("UHI") Mitigation Program

**Submitted by the New Jersey Environmental Justice Alliance to the New Jersey Board of Public Utilities**

April 17, 2025

***Introduction***

The New Jersey Environmental Justice Alliance (NJEJA) respectfully submits our comments to the New Jersey Board of Public Utilities (BPU) in the matter of the Establishment of an Urban Heat Island ("UHI") Mitigation Program, Docket No. QO24100834.

***The New Jersey Environmental Justice Alliance***

The New Jersey Environmental Justice Alliance (NJEJA) is a statewide organization mobilizing other organizations and individuals in order to increase the quality of life and upward mobility opportunities for communities who experience additional burdens resulting from histories of systemic racism. Our work covers a wide range of areas and we believe that the community's vision of improvement will always be the most effective and an important part of strategic development.

Therefore, as part of our ongoing work to support communities most impacted by disproportionate pollution burdens - and therefore, at the most risk of natural disaster and storm devastation - we submit these comments today in an effort to assist the BPU in their effort, "to ensure that safe, adequate, and proper utility services are provided at reasonable, non-discriminatory rates to all members of the public who desire such services. To develop and

regulate a competitive, economically cost effective energy policy that promotes responsible growth and clean renewable energy sources while maintaining a high quality of life in New Jersey."[1] Our range of work, state-wide and national reach, and diversity of membership gives us a unique perspective on environmental protection and allows us to bring the concerns of historically overburdened communities to the forefront of the conversation. We welcome continued conversation in this matter.

***Necessity of Work Focusing on Heat Impacts***

As has been aptly stated by the BPU as well as other agencies within the New Jersey State government, New Jersey is the fastest-warming state in the Northeast in large part due to an incredibly dense urban environment.[2] It is well documented that temperatures are expected to continue to rise in the coming years as a result of climate change with each present year recording higher and hotter temperatures than the last. Furthermore, UHIs will see higher temperatures as a result of urban planning, including lack of tree cover,[3] heat absorbing materials such as asphalt and concrete, the geometry of urban planning and development, as well as general human activity.[4]

We know that higher heat, particularly for those in UHIs, leads to increased negative health outcomes.[5] Research indicates that heat-related mortality causes more deaths annually than any other severe weather-related death, with an average of 1,500 Americans dying from heat each year.[6] Likewise, increased and persistent exposure to high levels of heat has been shown to have negative health impacts for individuals, leading to short term illness such as heatstroke, heat

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[1] New Jersey Board of Public Utilities. *Mission Statement.* Board of Public Utilities. https://www.nj.gov/bpu/about/mission/.

[2] NY Times, *New Jersey is One of America's Fastest-Warming States, Data Shows*, https://www.nytimes.com/2024/07/03/nyregion/new-jersey-warming-climate-change.html.

[3] WHYY. *New Jersey Tree New Jersey communities of color grapple with lack of trees, environmental inequity.* February 2023. https://whyy.org/articles/new-jersey-tree-canopy-inequity-camden-newark-trenton/

[4] US EPA, *What are Heat Islands?*. https://www.epa.gov/heatislands/what-are-heat-islands.

[5] New Jersey Department of Environmental Protection. *Healthy Community Planning Report*. 2022. https://www.nj.gov/health/hcpnj/documents/county-reports/HCPNJ_fullreports/ESSEX_NEWARK%20CITY.pdf

[6] Hsu, et. al, *Disproportionate exposure to urban heat island intensity across major US cities,* *https://www.nature.com/articles/s41467-021-22799-5*

exhaustion, and dehydration[7] as well as long term illness including cardiovascular disease and other cardiac-related issues.[8] Therefore, the majority of UHIs are suffering a myriad of disproportionate health outcomes and related-mortality rates as a result of unmitigated heat levels in their communities.

***Category: Comprehensive UHI Intervention***

While we respect that the BPU requires projects in this category to utilize a "whole neighborhood approach," we must interject that this phrase does not necessarily guarantee direct community benefits nor does it ensure that community-based organizations, community leaders, and residents have been adequately engaged in the proposal and planning of the application for this grant. Therefore, we encourage the BPU to establish a definition of this term to ensure that communities are a guaranteed stakeholder in this process and hold equal weight with any municipality that applies for this grant.

This comment is in line with our notes on the BPU Energy Master Plan Comment solicitation period in June 2024 where we wrote:

> *Those that live in overburdened and disproportionately polluted communities have the best understanding of the challenges they face, and the first-hand knowledge of what solutions would mitigate these issues.*

Applicants for this grant - particularly applicants that are municipal entities - should be required to demonstrate substantive and robust community input in their application and planning process, as well as strategy for long-term implementation to be sure that capital investments are in line with the resident's and community member's visions for their neighborhoods. This guarantee has a secondary benefit for the municipality by ensuring that project applicants do not overlook a key area of investment that would not be as visible to municipal actors who may not be as familiar

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[7] Johns Hopkins Medicine. *Dehydration and Heat Stroke.* https://www.hopkinsmedicine.org/health/conditions-and-diseases/dehydration-and-heat-stroke

[8] Cleland, et. al., *Urban heat island impacts on heat-related cardiovascular morbidity: A time series analysis of older adults in US metropolitan areas,* https://www.sciencedirect.com/science/article/pii/S0160412023002787

with the day to day landscape and central spaces of the community. With this, co-benefits of investment are also bolstered through the co-design process.

***Category: Cooling the Built Environment***

With regards to cooling the built environment, we heartily agree with the BPU's assessment that more cooling centers and infrastructure is needed. We know that low-income individuals, families, and communities are at increased risk of heat-related illness due to concerns regarding increased utility bills should they use A/C units to stay cool, assuming that such individuals have access to that infrastructure in their home at all. As a result, this puts low-income residents at significant risk of heat-related illness.

However, we strongly encourage the BPU to emphasize and center the importance of adopting building decarbonization strategies and energy efficiency plans as a requirement for this grant. While cooling centers are needed for many across the state, it is imperative that the BPU also ensure that increased energy usage from these centers does not have an unintended consequence of increasing local air pollution. Therefore, building decarbonization efforts and implementation of energy efficiency tactics within these large-scale areas should be central to this portion of the grant.

Additionally, we encourage the BPU to allow both municipalities and community-based organizations to be eligible for this grant. Community-based organizations often have physical locations which serve as central organizing and coordination hubs for residents, community leaders, and allies. As a result, these locations may not necessarily be considered to be a priority for municipal leaders even if they are integral to the fabric of the neighborhood for residents.

***Category: Urban Microclimate Interventions***

We are excited to see a category specifically targeting microclimate interventions as such projects are often overlooked in funding mechanisms for communities. Such interventions offer scalable opportunities for climate change mitigation and community restoration, beautification,

and development. In this space, it is critical that any community organization - regardless of their connectedness to elected representatives - be eligible and encouraged to apply. Although we do not oppose BPU encouraging these applicants to have previously connected with municipal leaders prior to applying, instituting a requirement that necessitates a mayoral letter places a roadblock for organizations who may not have access to their mayor or an elected official willing to respond and support in a timely manner.

In the event that BPU must receive some proof or documentation of communication, we encourage the BPU to consider acceptance of correspondence with any elected municipal leader who could support the community-based organization in the implementation of their project.

***Evaluation Criteria***

For evaluation criteria, we encourage the BPU to increase the weight associated with "Municipal Level and Community-Level Evaluation." This is of particular importance considering that OBM communities are documented - both by anecdotal evidence/lived experience and academic research - to suffer higher levels of heat as UHI communities and the associated disproportionate negative health outcomes. Therefore, this should be a significant factor in considering where funding should be allocated. We believe that communities which suffer the highest burden should therefore be first to see remedy and support.

Secondly, with regards to applications submitted by municipal entities, we recommend that the BPU require a co-signatory on the application by a community-based organization who supports the project and intends to lead in facilitation and development. This is in line with previous comments stressing the importance of community input, resident engagement, and co-design with community members. Furthermore, partnership between municipal stakeholders and community-based organizations increases the likelihood of success and utilization of the completed resource.

***Conclusion***

These comments are submitted in an effort to share understanding and best practices with the NJ Board of Public Utilities. Due to our history as an organization and our ongoing work, we are aptly suited to highlight how EJ communities are impacted by heat and the dangers of living, working, playing, and praying in an UHI community. Addressing the growing threat of heat to New Jersey communities is an important project and not only an environmental effort, but a public health measure as well. We continue to offer support in building more resilient, heat-resistant communities in New Jersey and are willing to engage in ongoing conversation with the NJBPU concerning the thoughts presented in these comments.

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