

April 5, 2025

Governor Phil Murphy
Office of the Governor
125 West State Street
Trenton, NJ 08625

RE: New Jersey Protecting Against Climate Threats Resilient Environments and Landscapes

Dear Governor Murphy,

Over the past seven years of your administration, New Jersey has made remarkable progress in becoming a national leader on environmental and climate action. From initiatives like the Environmental Justice Bill and the Plastic Pollution Reduction Act to your ambitious clean energy goals, your administration has demonstrated a commitment to prioritizing the health of our people and natural resources. We commend you and the dedicated agency staff of your administration for their efforts on these critical issues.

In January 2020, you announced one of the [most groundbreaking policies](#) we've seen so far, directing the New Jersey Department of Environmental Protection through [your Executive Order 100](#) to examine key sets of rules and regulations to ensure that New Jersey can effectively combat the climate impacts that are starting to take a larger toll on our state and its residents every year. Protecting Against Climate Threats (NJ PACT) may be the best tool we currently have to commit New Jersey to a path towards a truly resilient future.

Since that announcement, NJDEP has made substantial progress in fulfilling the promise of Executive Order 100, including the adoption of the [Inland Flood Protection Rules in July 2023](#). As you are aware, our community strongly advocated for and celebrated the adoption of this rule package, fighting off a disinformation campaign aimed at preventing this adoption even as New Jersey marked the anniversaries of some of the worst storms and flooding events in our history. Yet as important as they are, the Inland Flood Protection Rules were a small part of a much larger set of updates to the Department's regulations targeted under NJ PACT, including the Resilient Environments and Landscapes Rules (REAL Rules).

Over the past four years, NJDEP has diligently focused on developing the REAL Rules, which encompass most of the promised reforms. Staff have been stakeholdering and developing these regulations that would advance key protections for our wetlands and streams, which are still vulnerable from the impacts of the rollbacks of the Christie Administration. They would provide essential improvements to our stormwater program so that we can correct the flooding

problems created by historic development. Maybe the most urgent of all, the rules would fortify protections for our coastal communities facing rapidly escalating threats from sea-level rise.

According to [new research](#) published in the journal *Nature*, Atlantic City is one of the most vulnerable coastal communities on the East Coast and up to \$20 billion worth of properties could face exposure to flooding in about 25 years under sea level rise. North Wildwood's ongoing struggle to preserve its eroding beaches and the [anxieties expressed](#) by residents about losing their homes further underscores the widespread challenges faced by a growing number of Shore towns grappling with [increased flooding](#), even during sunny day weather conditions.

The concerns extend beyond the environmental community, as these trends have tangible financial impacts on New Jersey and its residents. [A recent hearing](#) held by the Senate Environment and Energy Committee on March 7th, 2024 delved into how the insurance industry is grappling with current and future risks linked to climate change. Testimony from the insurance sector revealed that despite the billions of dollars in damage incurred from storm events in the last decade, a staggering 90% of structures in NJ lack flood insurance coverage and that though volatile and extreme weather events are becoming more common, we're still building in our most vulnerable areas. The cost of repairs from storm and flooding damage to homeowners continues to rise with the inflation of material prices and labor and the number of total loss claims is growing. New Jerseyans cannot keep up with the price of repairing their homes and businesses after each flooding event, and we must address the pressing need for action to mitigate these growing impacts and costs.

The REAL Rules hold many of the solutions needed to tackle these challenges. They will promote the nature-based solutions and green infrastructure that we should be employing. They will guide the way we build along the shore so that we're not throwing money away with the tide and putting even more people in danger. The rules add increased protections for all communities statewide that are developing and redeveloping by requiring stronger stormwater management. They encourage us to look to the best science to inform our future plans and they have the potential to save lives.

Unfortunately, similar to the Inland Flood rules, this latest round of NJ PACT proposals has long been promised and delayed. Despite DEP staff's hard work, extensive stakeholder input, and the urgent need for these rules, multiple deadlines to release the REAL Rules have passed. The public has been eagerly awaiting these proposals for four years and we urge you to officially file these rules by Earth Day on April 22 to the Office of Administrative Law for review so they may proceed to the New Jersey Register. This step is crucial for thorough public review and eventual adoption, benefiting all those affected by these regulations.

The need for increased transparency and accountability in politics have been common themes discussed in New Jersey as of late. Legacy is another. Despite your promises surrounding NJPACT and the vital protections they would provide those who live and work in such a [climate vulnerable state](#), there is an ever-decreasing window for these rules to be proposed and adopted during your tenure. We urge you to see this through, strengthen your environmental legacy by laying a solid foundation for your successor, and secure New Jersey for current and future generations to come.

Sincerely,

Tim Dillingham, Executive Director, American Littoral Society

Jennifer M. Coffey, Executive Director, Association of New Jersey Environmental Commissions

Kelly Knutson, Director, Coalition for the Delaware River Watershed

Robert Tallon, President, Crafts Creek Spring Hill Brook Watershed Association

Laura McBride, President, Deal Lake Watershed Alliance

Maya K. van Rossum, Delaware Riverkeeper, Delaware Riverkeeper Network

Doug O'Malley, Director, Environment New Jersey

Fred Akers, Operations Manager, Great Egg Harbor Watershed Association

Sally Rubin, Executive Director, Great Swamp Watershed Association

Captain Bill Sheehan, Riverkeeper & Executive Director, Hackensack Riverkeeper

Jesse Burns, Executive Director, League of Women Voters of New Jersey

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