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Board of Public Utilities
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Ocean Wind , LLC
Docket No. Q022050347

September 29, 2022

Good evening,

The Ocean Wind Offshore Wind Farm plans as presented in the public record rises many questions and this evenings hearing focuses on the export cable and its placement in the Ocean City & Cape May County Public Rights of way. The Project will also occupy portions of route 9 in Upper Township which is a State Right-of-Way. This decision to be based in part on environmental impacts.

First Comment

Not part of this Boards Records are responses by Ocean Wind to comments made in the Scoping Process for Green Acres, specifically on page 21 of Ocean Wind Response To Comments posted on the Green Acres Site is the response, "The forecasted HDD operation duration is approximately 60 days and 24 hours per day operations only for a portion of that time." Section 3.3.5.2 of the Ocean Wind Environmental Assessment report also states work outside of hours specified in NJDEP and local noise regulations is expected."

Does this Board have the authority to authorize violation of laws? To the residents in the immediate area, I suggest that citations be given to the equipment operators and foreman. As I understand drilling, forward progress stops every time a new length of drill shaft is added. Stopping the drill is common what does not stop is the flow of the drilling mud and the mud pump. I suggests an electric drive for the mud pump and compliance to local limitations regarding non-emergency construction.

Second Comment

Testimony by Jason Kalwa Exhibit OW-1 page 10 refers to Appendix C which includes a metes and bounds description for a 30 foot wide easement crossing Ocean City Lot 17.01 of Block 3350.01.

The information presented by Marc Reimer in Appendix J implies significant research on Ocean Wind's part regarding the history of various land parcels.

[REDACTED]

[REDACTED] This parcel is also listed in the online assessors records and recorded in Deed Book [REDACTED]
[REDACTED]. The County of Cape May right of way for route 656 is not continuous. The

request route is not a continuous path. The proposed cable crosses a recorded parcel of land for which an easement has not been requested. An additional easement is needed for this project and to date notice has not been given. The application is currently deficient.

Comment Three

Testimony by Jason Kalwa Exhibit Page 18 states "Failures on cables themselves are not expected". Table 6.1.2-10 of the Construction and Operation Plan Volume I on page 121 & 120 of 159 forecasts three (3) cable fault events for the BL England Export Cables. Ocean City is full of people with bare wet feet and so I ask that any approval require that the Access Hatches for the Joint Transition Vault and other access vaults be located outside of the pedestrian pathway and be non-conducting.

Comment Four

The Testimony of Jason Kalwa Exhibit OW-1 on Page 16 "we do not expect there to be any public safety or other safety concerns" and in the Green Acres response to comments, the sidewalks may be limited at various times during construction to ensure pedestrian safety." I recommend safety barriers at the curb line and point out SCOUT 458 U.S. 419(1982). Obstructing access can be seen as a taking and I count 20 properties that require the use of the 35th Street sidewalks to access the dwellings.

Comment Five

The presentation made to the Board does not mention that much of the Export Cable will be installed by open cut through historic fill. This includes the former railroad grade of the Pennsylvania Reading Railroad on Haven Avenue and the West Jersey Railroad on West Avenue. This is an environmental concern regarding public safety and should be reviewed prior to action by this Board.

Comment Six

The ground water is at or within inches of the ground surface. Dewatering will be necessary during construction and removal of water to enter the vaults is also expected during operations. During construction the blast stone of the railroad will exacerbate the dewatering issue. The submissions to the Board are silent regarding disposal of contaminated water from the historic fill and the railroad grades. Additionally, the municipal storm water system is does not have sufficient capacity to receive the flow expected from dewatering operations. The Board should defer its decision until this topic has been is adequately addressed to the Board by Ocean Wind.

Comment Seven

The Testimony of Jason Kalwa Exhibit OW-1 on Page 6 references Appendix B which notes "Imported Backfill" and the testimony and appendix B do not explain. The Construction and Operation Plan, Volume I, on page 147 of 157 makes reference to the thermal output of the cables in the statement, "The alignment of the onshore interconnection cable system duct bank will be spaced at a minimum of 15 feet from the onshore transmission cable system duck bank, in order to maintain thermal isolation between the two circuits." The electric cables in use give off heat. The amount of heat given off and

the temperature gradients are determined by the cable size and current flow. None of this is discussed in the exhibits and reports. Based on other published information the Temperature of the Ocean Floor over the Export Cable is estimated at 118 degrees Fahrenheit. That could explain reports that flounder will not cross the cables. The cables that Ocean Wind expects to fail, usually do so when the temperature exceed 90 degrees Centigrade, 194 Fahrenheit. The water table under 35th Street is at times lower than the road surface. In those cases a thermal retardation front will be established and the temperature will be higher. Ground water will vaporize and may carry contaminants from the historic fill into the neighborhood. If you visit the intersection of Pacific & Missouri Avenues in Atlantic City you will see a metal stack from which steam is being released. This is not a steam leak it is the groundwater being vaporized by the mid-town utility plant heating loop.

In addition to the threat of pollution the steam damages plants and impacts wildlife. Unless steps are taken damage from falling trees along route nine is a foreseeable event.

On land Forced Cooling is a solution.

Comment Eight

During the Scoping process the comment was made, that if NJBPU, NERC, OSHA limit occupancy or use for system reliability or worker safety and that zone extends onto the adjacent property Orsted must obtain express permission from the adjacent property owners.

The response is "Ocean Wind I does not anticipate needing any additional workspace outside of the 30-foot right-of-way proposed on the Ocean City-owned beach lots."

Let's look at this differently.

Does Ocean Wind take any exception to the adjacent property owner installing a flagpole on their property with lightning protection that is located within 23 feet of the operating export cable. Re-grading properties to improve flood resistance is becoming popular does Ocean Wind take exception to a property owner on 35th street installing 30 foot long steel sheet piles at the property line which may be within twenty feet of the operating export cable. Do work rules OSHA impact on performing a fifty foot soil test bore on private property within 20 feet of the operating export cable. Any restrictions on these activities other than requiring mark-out is a taking. See comment number four.

(See public comments of September 28, 2022, meeting for Redacted information.)

Qualifications

I am a long time resident of Ocean City.

I have a Bachelors Degree in Land Surveying from the New Jersey Institute of Technology

I am a level three certified survey technician

I am a Certified Flood Plane Manager.

I have a Bachelor's of Chemical Engineering from the Catholic University, courses included, Electric Circuits I, Electric Circuits II, electro mechanical devices (transformer design), electro chemistry, thermodynamics, heat transfer, and controls.

I have a Master's of Science in Chemical Engineering from Drexel University with course work in thermodynamics, groundwater modeling, controls, waste water treatment, and water supply treatment.

I am a Professional Planner licensed in the State of New Jersey

I am a Professional Engineer licensed in the States of Pennsylvania & New Jersey

Projects have included,

The design and specification of deep (900 FT) well construction along with the well building, electrical systems and controls for Sea Isle City.

The design and specification of Horizontal Directional Drill Project installation of water and sewer mains for the Lower Township MUA beneath the Cape May Canal.

The design and specification of Horizontal Directional Drill Project installation of water and sewer mains for the Borough of West Wildwood beneath the Wildwood Canal.

As the Acting City Engineer for Atlantic City, I provided Engineering over site for Directional Horizontal Drill operations performed by the Water Department, Installation of the Photovoltaic system on the roof of the Public Works Building. I also proposed a constructible route for the Fisherman's Energy Export Cable. I designed the Atlantic City Boardwalk north of Oriental Avenue.