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MEMORANDUM

Inter-Agency Advisory, Consultative and Deliberative Material

To: Kira Lawrence, PhD (via email)
Clean Energy Division
New Jersey Board of Public Utilities
44 South Clinton Ave.
Trenton NJ 08625

From: Branwen L. Ellis
Environmental Specialist

Through: Charles M. Horner, P.P. *CMH.*
Director of Regulatory Programs

Date: July 5, 2022

Subject: Pinelands Application # 2021-0164.001
BPU Proposals # 127 & # 604
Cardiff to New Freedom 230kv O/H electric transmission line
Egg Harbor Township
Hamilton Township
Town of Hammonton
Winslow Township

On June 10, 2022, we received and reviewed the State Agreement Approach (SAA) proposal # 604 in response to a request for the Pinelands Commission to provide input on proposed upgrades to an existing 32.4 mile Cardiff to New Freedom 230kv O/H electric transmission line. Approximately 31.02 miles of the existing electric transmission line is located within the state-designated Pinelands Area.

In the Pinelands Area, all proposed development must meet the permitted land use and environmental standards of the Pinelands Comprehensive Management Plan (CMP).

Permitted Land Use

The Pinelands Area is divided into land management areas. Pinelands land management areas are similar to very large municipal zoning districts.

The proposed development is located in the following Pinelands land management areas:

Parkway Overlay District;
Regional Growth Area;
Pinelands Village;
Rural Development Area;
Agricultural Production Area;
Federal Installation Area (William J. Hughes Technical Center); and
Forest Area.

The CMP defines the proposed upgrades to the existing electric transmission line and associated development (herein after “proposed development”) as “public service infrastructure.”

Public service infrastructure is a permitted land use in the Parkway Overlay District, Regional Growth Area, Pinelands Village, Rural Development Area and Agricultural Production Area.

Approximately 12.68 miles of the proposed development is located in a Forest Area and approximately 1.0 mile is located in a Federal Installation Area (William J. Hughes Technical Center).

In the Forest Area, the proposed development may qualify as a permitted land use based upon a provision in the CMP that allows for a 50% expansion of an existing nonconforming use. If the proposed development does not qualify for this 50% expansion provision, it must be demonstrated that the proposed development is intended to primarily serve only the needs of the Pinelands.

In a Federal Installation Area, the proposed development may also qualify as a permitted land use based upon the same 50% expansion provision. If the proposed development does not qualify for the 50% expansion provision, it must be demonstrated that the proposed development is associated with the function of the Federal Installation and certain conditions are met (CMP, N.J.A.C. 7:50-5.29 (a)).

So that we may provide further guidance on the portion of the proposed development located in a Forest Area and a Federal Installation Area, please provide the following information:

- Will the proposed development directly service the Federal Installation?
- Within the Federal Installation Area, is the existing transmission line located underground, on poles or on towers?
- Within the Federal Installation Area, will the proposed development be located underground, on poles or on towers?
- Within the Federal Installation Area, if the proposed development will be located on replacement poles or replacement towers, please provide the number of existing and proposed poles or towers.
- Within the Forest Area, identify the number of existing transmission towers/poles associated with the electric transmission line and the number of proposed electric transmission towers/poles.

- Please identify the proposed applicant and their relationship to Atlantic City Electric and PSE & G. This information will help in determining the appropriate Pinelands Commission application and approval process, and whether or not the proposed development meets CMP standard for the 50% expansion of the existing electric transmission line.
- The capacity of the existing and proposed electric transmission line(s).

If the above requested information does not demonstrate that the proposed development in the Forest Area and the Federal Installation Area qualifies for the 50% expansion provision noted above, additional information may be required to demonstrate that the proposed development meets the permitted land use standards in the Forest Area and the Federal Installation Area.

Environmental Standards

In addition to being a permitted land use, the proposed development must also meet the environmental standards of the CMP. Of particular note, the proposed development must meet the wetland protection and threatened and endangered species protection standards. It is our understanding that the proposed development will be located within existing cleared areas and existing paved roads. To the extent that the proposed development is located within existing cleared areas and existing paved roads, it should not raise any insurmountable issues with the wetland protection and threatened and endangered species protection standards.

Proposed Reega Converter Station

A Reega Converter Station is proposed on combined 77.5 acre Block 1132.01, Lots 28 & 29 in Hamilton Township. The submitted information indicates that the proposed converter station will require approximately 15 acres. Based upon review of available information, our staff has identified significant wetland protection and threatened and endangered species protection concerns with the proposed development of a converter station on this parcel. The proposed development may be inconsistent with the wetland protection and threatened and endangered species protection standards of the CMP.

Development Located Outside of the Pinelands Area

Please note that the following proposals included in the June 10, 2022 submission are not located within either the Pinelands Area and are therefore not subject to Pinelands Commission review and comment:

- Peach Bottom-Conastone 500 kv line, Peach Bottom South substation, Consatone substation in Maryland
- Richmond-Waneeta 230kv line near Richmond substation in Pennsylvania
- Potential Deans/Fresh Ponds Converter Station in Middlesex County, NJ
- Potential Oceanview/Neptune Converter Station in Monmouth County, NJ

Please do not hesitate to contact Branwen Ellis or Charles Horner with any questions.

c: Susan Grogan, Acting Executive Director