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September 1, 2022

SUBJECT: DMAVA Review of BPU proposals for wind generated power distribution lines proposed to traverse the Sea Girt National Guard Training Center (990 -- CON EDISON)

FROM: Jill Ann Priar, State Deputy CFMO

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Date: 2022.09.01 13:10:09 -0400

TO: Andrea Hart, BPU State Agreement Approach Project Lead

We appreciated the opportunity to review the package that CON-EDISON submitted to BPU. The DMAVA provides the following comments regarding the impacts and concerns related to use of the National Guard Training Center at Sea Girt in their proposal.

The following DMAVA employees participated in the review: Review participants: Eric Sproesser, Paul Rumberger, Steve Hoffman, Charles Appleby and Jill Ann Priar.

The scope of our review was confined to review of the proposal's impact to the grounds of the National Guard Training Center (NGTC) at Sea Girt. This proposal suggests the use of the [REDACTED] of the property to place the land fall underground infrastructure on the grounds and then traversing the northern portion of the property along Sea Girt Avenue at an approximate distance of 70 +/- feet from the fence line. The following concerns were noted during our review:

- 1) The proposed route for the installation of the cables is not ideal as it is inset into the property by approximately [REDACTED] and traverses potentially developable areas on the site which may impede future development in those areas. DMAVA recommends the cabling be placed in the public right of way closer to the fence line to avoid negative impacts to the State's missions at the site.
- 2) There is insufficient information on proposed infrastructure in the [REDACTED] of the property to fully evaluate their proposal. There are existing communications infrastructure that is in place in that area, some of which are being considered for reuse. While the area may be able to accommodate the proposal, additional information and studies would be required to fully evaluate the proposal and safely proceed.
- 3) Use of a construction laydown area may need to be modified in order to ensure no disruption to the activities on the NGTC. The details will vary based on time of year that the work occurs.
- 4) The actual work for the installation of the infrastructure would need to occur during a period that would not negatively impact the NGTC missions or endangered species at the NGTC. Activities in proximity to the beach are restricted during the nesting period (15 Mar - 15 Aug) and through Labor Day each year.
- 5) A long-term easement and temporary construction easement package would need to be submitted, processed and finalized before construction start.

The CON EDISON proposal would need to be adjusted to minimize disruption of infrastructure, missions, endangered species and environmentally sensitive areas at the site in order for it to be supportable by DMAVA and the NGTC.