



State of New Jersey  
DEPARTMENT OF MILITARY AND VETERANS AFFAIRS  
POST OFFICE BOX 340  
TRENTON, NJ 08625-0340

PHILIP D. MURPHY  
Governor  
Commander-in-Chief

SHEILA OLIVER  
Lieutenant Governor

☆  
LISA J. HOL, D.O.  
Brigadier General  
The Adjutant General

September 1, 2022

SUBJECT: DMAVA Review of BPU proposal for wind generated power substation proposed on the Sea Girt National Guard Training Center (LS Power)

FROM: Jill Ann Priar, State Deputy CFMO

PRIAR.JILL.A.126462  
5960

Digitally signed by  
PRIAR.JILL.A.1264625960  
Date: 2022.09.01 13:12:17 -04'00'

TO: Andrea Hart, BPU State Agreement Approach Project Lead

We appreciated the opportunity to review the package that LS Power 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, as a preferred option, the use of the [REDACTED] corner of the property equal to approximately 10% of the overall site to construct a substation. The following concerns were noted during our review:

- 1) The proposal's preferred option includes a request for approximately 10% of the overall NGTC site. It competes with military training site areas and is not conducive to supporting activities routinely conducted at the site
- 2) The proposal includes inaccurate information on the response that DMAVA had to preliminary discussions regarding siting a substation on the grounds of the Sea Girt National Guard Training Center site.
- 3) Additional review and approval by Force Protection and Home Land security experts would be required, for the preferred site, to determine compliance with criteria contained in UFC 4-0101-01 related to force protection and critical infrastructure.
- 4) The proposal's preferred site includes substantial above grade Structures in a known SHPO view shed area, therefore SHPO review and approval will be required. SHPO approval is expected to be problematic given the type and size of the view obstruction.
- 5) The proposal's preferred site includes substantial disruption of a known environmental Area of Concern involving lead and asbestos contamination. More particularly it includes installation of [REDACTED] [REDACTED] This area is not only an environmental AOC, it may also be required to support future range development in support of military and law enforcement training conducted at the site.
- 6) The cables proposed inbound to the preferred site from the sea, are in an area already congested with communications cabling and infrastructure.

- 7) The proposal involves the transmission of the large volume of AC current which will produce electromagnetic fields (EMF). A thorough investigation on the implications/impact EMFs will or may have on the NGTC operations and existing commitments will be required.
- 8) The proposal's preferred site competes or potentially competes with the functionality of existing communications cabling and infrastructure and will impede future development opportunities in that area.
- 9) The proposal's preferred site overlays existing training site infrastructure (water/sewer electric lines) which could present potential risks, limitations and obstacles for maintenance and upgrades activities relative to them. These issues would need to be addressed.
- 10) The proposal's preferred site will require an in-depth study to determine impacts and mitigation measures to safeguard known endangered species in the area. The user would be required to fund said study which DMAVA will arrange to have conducted. Based on current information, if a study were to occur, the anticipated outcome would not be supportive of their proposal.
- 11) This proposal's preferred site is expected to receive substantial local government and resident push back. DMAVA works with local governments and residents to foster an environment conducive to maintaining harmonious and symbiotic relationships. This proposal is expected to have a significant negative impact on that effort which is critical to our mission; more specifically as it relates to community relations, recruiting endeavors and various local government partnership agreements.
- 12) 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.
- 13) A long-term easement and temporary construction easement package would need to be submitted, processed and finalized before construction start.

The LS Power proposal for use of the NGTC to build a substation on approximately 10% of the entire training site is significantly disruptive to the NGTC. Their proposal is expected to receive significant pushback from the local community. The impacts of EMF's to the operations conducted at the site and the endangered species on the site would need to be evaluated and considered in order to determine supportability of moving their preferred site option forward. For the reasons stated above, of the three proposals DMAVA evaluated related to the transmission of wind generated power the LS Power proposal is the most disruptive and problematic for DMAVA and therefore the least desirable.