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The results of the archaeological survey will be documented in a technical report prepared in accordance with professional standards and in accordance with regulatory requirements. The cultural resource specialists who will perform this work will meet or exceed the qualifications required to perform the work. The report will include recommendations regarding any cultural resources identified as well as specific treatment options for those resources (e.g., avoidance) that may be required.

At all times, any human remains, if encountered, will be handled with respect and according to all prescribed procedures. ACE will adhere to all regulatory requirements and any applicable Tribal policies. Any work provided in association with the investigation of human remains will be coordinated and negotiated with the appropriate agencies and interested tribes.

Health and safety will be addressed in a site-specific Health and Safety Plan. The Occupational Health and Safety Administration mandates preparation of this plan. The Health and Safety Plan identifies and evaluates health and safety hazards that may exist in a project area and provides procedures and equipment to be employed to minimize worker exposure to the potential hazards. In addition, field personnel will follow ACE safety policies and protocols and have all required training before commencing work on the project.

It is anticipated that any archaeological sites identified through the investigation will be avoided and no site evaluation or data recovery efforts will be required. Upon completion of all work, any collections recovered, and all field notes, will be prepared for permanent curation at the required repository, presumably a state or local museum. If the museum, or other approved repository, does not accept an archaeological collection for permanent curation, ACE will determine final disposition.

### *Visual Impact Assessment*

ACE will identify how many scenic and aesthetic resources of statewide significance are located within the vicinity of the project right-of-way, including municipal and county parks, trails, and recreation areas; state parks, recreation areas, and wildlife management areas; national parks and wildlife refuges; and properties listed in the National Register of Historic Places (“NRHP”).

ACE will conduct a visual impact assessment for the project potential impacts on these and other identified potentially sensitive resources as necessary.

ACE typically conducts a viewshed analysis for the entire study area. The viewshed analysis is prepared using GIS data and software to determine the extent of visibility of the proposed project structures and ROW from each of the aesthetic and scenic resources of significance. After determining which scenic and aesthetic sites are within the viewshed of the project, ACE will then prepare photo simulations at those locations. The GIS-based viewshed analysis will not consider the effects of vegetation because photographic evidence from each site will provide greater accuracy for assessing vegetative screening effects.

Photographs are typically taken at each of the scenic and aesthetic sites within the project viewshed in the directions where potential visual impact concerns are indicated by the viewshed analysis. Views will be considered and documented if necessary, from the entire affected area. Additionally, photographs will be taken of each site's primary elevation. Photo-simulations will be prepared to simulate the visual impacts of the transmission line sites. The photographs selected for simulation will demonstrate what was perceived to be the greatest possible obstruction to the property's viewshed from the proposed project.

ACE will prepare a Visual Impact Assessment Report, which will include an inventory of the scenic and aesthetic sites in the study area, aerial imagery depicting the location of each site in relationship to the project, results of the viewshed analysis, photo-simulations, elevation drawings of the proposed towers, a narrative containing descriptions of the resource and setting, a discussion of the significance of potential impacts, and, if necessary, proposed mitigation measures.

While this is a typical description of a visual impact assessment, we note that the proposed project is assumed to be entirely contained underground [REDACTED]. Construction of the proposed project should not significantly impact the current visual impact.

### *Noise Analysis*

In accordance with applicable New Jersey regulatory requirements, ACE will describe existing noise conditions based on land use mapping and typical urban, suburban, and rural background. Federal and state noise impact criteria will be described. ACE will research and summarize the local noise ordinances (if any) of the municipalities crossed by the project. Construction impacts will be discussed based on the typical equipment requirements commonly

associated with transmission lines. ACE will identify the worst-case locations where residences or other noise-sensitive land uses are located closest to potential construction activity. The analysis will also describe the efforts made to locate and design appurtenant structures to avoid or minimize any potential for noise disturbance in the adjoining areas.

The noise analysis assumes that no existing conditions noise monitoring will be conducted and that existing conditions will be characterized based on land use and proximity to roadways.

### *Traffic Plan*

During construction, the project right-of-way will be accessed using various road crossings and via existing access roads or new access roads constructed specifically for the project, if necessary. Construction access points from local roads will be located to ensure maintenance of safe traffic operations at those road crossings. To ensure safe and continued traffic flow and maintain access to any local residences or businesses that could be affected during construction, a Maintenance and Protection of Traffic (“MPT”) plan will be developed for each location where construction vehicles will frequently access the project right-of-way from local roadways to provide a safe construction work zone in any areas near the edge or within a traffic lane for construction activities within the road right-of-way. The MPT plan will identify temporary signage, lane closures, placement of temporary barriers, and traffic diversion patterns during construction activity. Traffic control measures will be developed as part of the final design of the project and will be incorporated into the environmental management and construction plan. The MPT plan will be discussed with Atlantic County and any affected municipalities prior to and during construction to ensure all parties agree and coordinated with the schedule for road closures.

### *Invasive Species, Land Cover Type Mapping, and Merchantable Timber Studies*

In addition to the environmental studies described above, ACE will conduct additional studies, such as an analysis of land use and vegetative communities along the project, to satisfy all requirements. ACE will use light detection and ranging (“LiDAR”) data, aerial photographs, and GIS data to conduct a desktop analysis of land use and vegetative communities along the project right-of-way. GIS specialists will map land use categories, which will then be field checked during wetland field surveys. Vegetation composition of land use categories will also be compiled. In addition, biologists will conduct a general inventory of invasive species during wetland field surveys. This inventory is not intended to be a presence/absence survey with a complete mapping of invasive species locations but, instead, is intended to provide a general inventory of the types of invasive species and general prevalence along the right-of-way.

Additionally, during field surveys, large stands of merchantable timber will be identified. ACE does not propose to estimate the value of timber and include it as part of the project.

### Illustrative Environmental Management and Construction Work Plan

In preparation for preparing the Environmental Management and Construction Plan (“EM&CP”), ACE will coordinate, and conduct site walk overs with interested agencies, including the NJ DEP and NJ BPU. The purpose of the site walk-overs will be to collect input from agency representatives on construction-related concerns in the corridor that will be addressed in the context of the EM&CP documentation.

ACE will prepare an EM&CP, in compliance with applicable requirements, that consists of a narrative and set of detailed plan and profile drawings. The EM&CP will illustrate and describe the site-specific locations of all proposed facilities and the environmental protection measures that will be implemented during construction. The narrative is anticipated to include a detailed description of the project, as well as construction, operation, and maintenance procedures. The EM&CP narrative will also provide a description and statement of specific techniques, procedures, and requirements to protect resources within the project right-of-way including:

- Erosion control
- Petroleum and hazardous substances
- Fugitive dust
- Herbicide
- Agricultural areas
- Stream and wetland crossings
- Access roads
- Clean up and restoration
- Invasive species control
- Protection of traffic
- Floodway/flood hazard areas

The EM&CP will describe the environmental supervision that will occur during project construction and provide sample construction documentation forms that will be used to provide periodic updates to interested regulatory agencies during construction.

It is assumed that the EM&CP will be accepted as complete upon submittal and that no deficiencies will be identified.

Please provide a description of the anticipated environmental benefit of a particular transmission proposal in comparison to radial lines:

- How does the project reduce environmental impacts to fisheries, habitat, and sensitive resources in comparison to radial lines?

This is an Option 1b proposal and is not intended to be a standalone substitute for radial lines. The proposed project may complement any radial lines or export cables that plan to reach the shore at the proposed [REDACTED]. If this Option 1b proposal is looked at as a substitute to radial lines, then this proposal is environmentally superior to any radial lines that propose to deliver less than 1,200MW or 1,600MW. This proposal is sized for 1,200MW with the ability to expand to 1,600MW without the need to [REDACTED] [REDACTED] for a second time. This Option 1b proposal is an environmentally superior option to any radial design that proposes to deliver the same amount of offshore wind using two or more separate routes, or two or more construction cycles using the same route.

- What is the reduction in impacts (approximate area) compared to radial lines, temporary and permanent?

This is an Option 1b proposal and is not intended to be a standalone substitute for radial lines. The proposed project may complement any radial lines or export cables that plan to reach the shore at the proposed [REDACTED]. If this Option 1b proposal is looked at as a substitute to radial lines, then this proposal would have less impacts compared to any radial line concept if the radial lines are proposed to utilize multiple paths or multiple construction cycles to deliver up to 1,600MW to Cardiff.

- A description of whether and how the project infrastructure, including offshore platforms, could provide direct ocean and ecological observations throughout the water column;

This is an Option 1b proposal; we believe this question is not applicable to the project.

Please provide a Fisheries Protection Plan that must include the following information:

- A scientifically rigorous description of the marine resources that exist in the Project area, including biota and commercial and recreational fisheries, that is informed by published studies, fisheries-dependent data, and fisheries-independent data, and identifies species of concern and potentially impacted fisheries;

This is an Option 1b proposal; we believe this question is not applicable to the project.

- A scientifically rigorous plan to detect impacts to marine resources, including biota and recreational and commercial fisheries;

This is an Option 1b proposal; we believe this question is not applicable to the project.

- Identification of all potential impacts on fish and on commercial and recreational fisheries off the coast of New Jersey from pre-construction activities through project close out;

This is an Option 1b proposal; we believe this question is not applicable to the project.

- A plan that describes the specific measures the Applicant will take to avoid, minimize, and/or mitigate potential impacts on fish, and on commercial and recreational fisheries;

This is an Option 1b proposal; we believe this question is not applicable to the project.

- An explanation of how the Applicant will provide reasonable accommodations to commercial and recreational fishing for efficient and safe access to fishing grounds;

This is an Option 1b proposal; we believe this question is not applicable to the project.

- A description of the Applicant's plan for addressing loss of or damage to fishing gear or vessels from interactions with offshore wind structures, array or export cables, survey activities, concrete mattresses, or other Project-related infrastructure or equipment.

This is an Option 1b proposal; we believe this question is not applicable to the project.

Please provide a description of how the Applicant will identify (or has identified) environmental and fisheries stakeholders, and how the Applicant proposes to communicate with those stakeholders during preconstruction activities through project closeout, as well as a plan for transparent reporting of how stakeholders' concerns were addressed.

This is an Option 1b proposal; we believe this question is not applicable to the project.

However, we do intend to develop a public outreach strategy. As already discussed throughout the application, public involvement is critical. Public involvement reduces risk to the project, maintains project schedules, and helps maintain the accuracy of cost. ACE has developed the following outline of its public outreach procedures to ensure that the public is aware and engaged in the project. This outline summarizes the steps ACE and ACE's public outreach contractors will take to implement its public involvement plan, including identifying key stakeholders, establishing a comprehensive project website to serve as a depository of information, and implementing a process for identifying and planning protocols associated with public meetings. These activities will promote a healthy and engaged discourse with the public about the proposed project.

### *Public Involvement Plan*

ACE's community affairs team will develop a comprehensive Public Information Plan that will ultimately be submitted to New Jersey regulators.

The Public Information Plan will include:

- General Project information (e.g., Project summary and need)
- Identification of key stakeholders
- Media coverage
- Project schedule summary
- Public meetings
- Government outreach
- Notification procedures
- Establishment of field offices (if necessary)

#### *Identification of Stakeholders*

In accordance with the applicable regulation, ACE's public outreach contractors will identify stakeholders to the project. These groups will include organizations in the vicinity of the project area and will be supplemented with local elected officials, local institutions, and other organizations intended to provide wide coverage of the potentially affected communities.

ACE typically identifies a robust list of stakeholders which may be briefed on the Project. Some of these stakeholders may include, but is not limited to:

- Federal representatives
  - U.S. Senators
  - U.S. Congresspersons
  - U.S. Army Corps of Engineers
  - U.S. Department of Energy
  - U.S. Fish and Wildlife Service
  - Federal Energy Regulatory Commission
- State Representatives
  - Governor's Office
  - New Jersey Board of Public Utilities
  - New Jersey Department of Environmental Protection
  - New Jersey State Senators
  - New Jersey State Assembly Members
- Pinelands Commission

- Atlantic County Planning Board

ACE may also provide electronic copies of the NJ DEP submission to relevant interested parties. ACE's stakeholder outreach will take place throughout the entire project planning, siting, permitting, approval, and construction and operation phases of this project. ACE is committed to open and transparent outreach with stakeholders.

#### *Distribution and Posting of Written Information*

ACE and ACE's community affairs team will develop a comprehensive project website devoted to the dissemination of project information to interested parties and stakeholders. The project website will incorporate the following information:

- Project summary
- Factsheets and frequently asked questions
- All public documents pertaining to the project, including
  - Press releases
  - Route maps
  - Background information about the project
  - Public documents with regulatory bodies on file
- Contact information, including an e-mail address and telephone numbers, for people to request more information and a tool to allow people to sign up to receive e-mail updates about the project
- Project specifications, including information on the technology being employed, cable placement and engineering, and field work activities
- A Project schedule and list of public meetings as well as public hearings

#### *Public Meetings*

ACE and its public outreach contractors will hold a to-be-determined number of public meetings along the proposed route for the project. Stakeholders will be consulted during the planning phase for input on the meeting locations. Notices for each meeting will be placed in local newspapers, on radio, and on local public-access television channels.

The format of each meeting will be consistent to ensure the uniformity of the information disseminated. ACE staff and consultants will be on hand to explain the project and answer questions from participants. Project factsheets and handout materials will be made available to all attendees.

### *Additional Media Coverage*

ACE and its community affairs team will monitor news outlets for coverage of the project.

Please provide an analysis showing that project infrastructure will not impact overburdened communities in a disproportionate fashion.

This is an Option 1b proposal anticipated [REDACTED]. All project components are proposed to be [REDACTED] and constructed [REDACTED], therefore, we anticipate no disproportionate impact to overburdened communities either during construction or once the project is completed. For additional information on ACE's commitment to fairness and a focus on diversity, equity, and inclusion, please see the response at the end of the Proposal Benefits section. ACE is committed to projects in its communities that are just.

Please provide a description of the applicant's permitting plan that includes the following:

- Identify all local, State and/or Federal permits and/or approvals required to build and operate the Project and the strategy and expected time to obtain such permits and/or approvals;  
Please see Attachment ACE-7: Permitting Requirements for a list of approvals required to build and operate the project. Additional work is required to determine the timeline as some approvals are dependent on needed studies and upon selection of this project by the BPU and PJM, ACE intends to initiate the needed studies and will follow-up with the specific timeline for each approval. However, ACE is confident that all approvals will be obtained in a timely fashion to ensure a phased in overall project in-service of 2028.
- Provide documentation of consultation with USACE beach replenishment projects and sand borrow areas, if applicable;  
This is an Option 1b proposal; we believe this question is not applicable to the project.
- Identify all applicable Federal and State statutes and regulations and municipal code requirements, with the names of the Federal, State, and local agencies to contact for compliance;  
Please see Attachment ACE-7: Permitting Requirements.
- Submit a land use compatibility / consistency matrix to identify local zoning laws and the consistency of applicant's activities in each local jurisdiction;

This is an Option 1b proposal [REDACTED]

[REDACTED] The scope of this question requires additional development work which has not yet been completed. If selected by the BPU and PJM, ACE will commence development activities and will identify all local zoning laws and the project activities in each local jurisdiction. We can follow-up with the land use compatibility/consistency matrix at that time.

- Identify each appropriate State or Federal agency the Applicant has contacted for land acquisition issues and provide a summary of the required arrangements;  
ACE has not contacted any State or Federal agency pertaining to land acquisition as we anticipate the [REDACTED]  
[REDACTED]
- Include copies of all submitted permit applications and any issued approvals and permits; and  
ACE has not yet submitted any permit applications and has not been issued any approvals or permits. Upon selection of this project by the BPU and PJM, ACE intends to initiate the work needed to submit all required permit applications.
- Include copies of all filings made to any other regulatory or governmental administrative agency including, but not limited to, any compliance filings or any inquiries by these agencies.  
ACE has not submitted filing with any regulatory or governmental administrative agency pertaining to the project.







[REDACTED]

- (b) How have you or will you engage community and stakeholders in this project? Yes, once the project is selected, ACE plans on engaging the local community and stakeholders in the vicinity of the project.
- (c) What are the potential impacts of this project on the community? Construction and traffic issues related to building [REDACTED]
- (d) What are the community concerns or potential concerns about this project? Specific concerns have yet to be identified but ACE will work to mitigate those concerns while meeting the required in-service dates.
- (e) How do you intend to address these concerns? ACE intends to develop a community engagement program to inform residents and businesses and gather feedback on construction windows and mitigate any identified concerns to the best of ACE's ability.
- (f) As part of this project, do you plan to perform any environmental improvements in this community? If yes, describe. ACE has not yet developed exact specifics around environmental improvements but will assess those options upon project award and as the exact route is developed. Road and other infrastructure improvements are potentially under consideration.

Please provide the Department with an additional narrative description function and its local/regional environmental, social, and economic benefits and impacts. Also, what sensitive receptors are present and how might they be affected by this project?

The project route would support the injection of 1200 MW of offshore wind from the Scull area to Cardiff using [REDACTED]

The Benefits to this route are the relatively limited number of residents that it will impact in the area. The route also does not have any major obstacles such as bridges or railroads to cross. This will reduce the construction cost and permitting effort.

The challenges to this route will be [REDACTED]

### **Air Quality**

Will activity at the site release substances into the air?

We are in the pre-development phase and specific activities at the construction site that may release substances into the air have not been studied; it is likely that substances will be released into the air.

Does the project require Air Preconstruction permits per N.J.A.C. 7.27-8.2(c)?

We are in the pre-development phase and this has not been studied. We will comply with all applicable regulation if the project is awarded to us.

Will your project require Air Operating permits (N.J.A.C. 7:27--22.1)?

We are in the pre-development phase and this has not been studied. We will comply with all applicable regulation if the project is awarded to us.

Will the project result in a significant increase in emissions of any air contaminant for which the area is nonattainment with the national ambient air quality standards (all of NJ for VOC and NOx; 13 counties for fine particulates), thereby triggering the Emission Offset Rule at NJAC7:27-18?

We are in the pre-development phase and this has not been studied. We will comply with all applicable regulation if the project is awarded to us.

Will the project emit hazardous air pollutants and/or toxic substances above reporting thresholds listed in NJAC7:27-17?

We are in the pre-development phase and this has not been studied. We will comply with all applicable regulation if the project is awarded to us.

Will the project result in stationary diesel engines (such as generators or pumps) or mobile diesel engines (such as bulldozers and forklifts) operating on the site? If so, which?

We are in the pre-development phase and this has not been studied. We believe that cement trucks, bulldozers and forklifts may be used, but a complete inventory of construction machinery has not been compiled. If the project is awarded to us, we will develop this list and can present it then.

# Attachment ACE-1: General Arrangement

Cardiff and [REDACTED] GA and One-  
Line

[REDACTED]

# Attachment ACE-2: KML file

# Attachment ACE-3: Cost Breakdown and Cash flow

# Attachment ACE-4: Risk Register

# Attachment ACE-5: Project Schedule



# Attachment ACE-6: Revenue Requirement

# Attachment ACE-7: Permitting Requirements