

NJ Transit disclosed their final power substation plans to the Borough of Bay Head during a meeting on January 8th, 2020. The borough has several concerns with what was proposed in the plans, which are listed below. These concerns need to be addressed in a timely manner given the imminent construction schedule for this project.

Issues with proposed plans:

1. Communication: There was no significant communication with the borough of Bay Head regarding project details or schedules since 2016.
 - a. At other recent meetings, where NJ Transit was present, Bay Head continually asked for details of the project, updates, and to be further included in the discussion.
 - b. Details of this project were finally disclosed to the Borough on Jan 8th, 3 weeks before the scheduled start of construction.
2. Public Consideration: Bay Head Borough respectfully requests the project be advertised to the public, plans be presented at a public information session and public comments collected before finalizing the design and starting construction. The Borough also requests that public comments be taken into consideration and appropriate revisions implemented to the plans in response to the public commentary.
 - a. When the concept of a maintenance facility was proposed for this site approximately 20 years ago, NJT conducted a public presentation which included a public comment period.
 - b. NJT took these comments from the public into consideration and considerably scaled back their initial plans.
3. Location: Necessity of wetlands encroachment for use in implementing this project.
 - a. The borough requests a copy of the land use study concluding that no other land on NJT property could be utilized to locate the substation, alleviating the need to encroach on wetlands.
 - i. NJT's property is rather large. The proposed substation could clearly be located where it would not directly threaten the adjacent waterway and where it would be more obscure from public view. The wooded NJT property would prove a better location that would alleviate several concerns at once.
 - b. Bay Head Borough is very susceptible to flooding on Twilight Lake and eliminating any amount of wetlands will intensify flooding. Bay Head is requesting a copy of the environmental study showing that filling wetlands would not adversely affect the community. If a study was not performed, the borough is requesting that it be initiated.
 - c. The borough requests further investigation into the reasoning provided that allows the filling of wetlands for non-critical infrastructure.
 - i. The filling of wetlands, in a susceptible area, to accommodate non-critical infrastructure is not appropriate or responsible planning.
 - ii. This substation does not feed a critical catenary system for train drive power (traction). The locomotives are diesel powered on this rail line.

- iii. The substation is primarily for wayside power for the locomotives. NJT has recently stated wayside power is not a “priority” or necessary for locomotives to operate.
 - iv. Wayside power is only used for engines a few hours overnight, when engines are parked and not operational.
 - v. The basis of the resiliency project is misleading as stated; “The new Bay Head substation will provide NJ TRANSIT and its customers with more reliable service in the face of future storms”. As stated above, rail service is not dependent on wayside power or power from the substation. Rail service would not operate during a flood due to safety concerns.
 - d. 6 substations were designed in total, mostly in industrial/commercial areas (Kearny & Hoboken) which also feed catenary power.
 - i. Bay Head is not an industrial area, does not require catenary power and this was not taken into consideration with regards to the design, placement or necessity of the building.
4. Backup Power: Investigate switching the diesel powered backup generator to a natural gas unit.
- a. NJ Transit agreed 20+ years ago to not fuel any equipment or permanently store any diesel at this location since it’s immediately adjacent to wetlands and an open waterway.
 - b. NJ Transit removed fuel storage & equipment from the Bay Head Yard at that time.
 - c. A fuel oil spill or accident would be especially significant and destructive at the Bay Head Yard due to the adjacent waterway.
5. Redundant Power Feed: This substation does not feed a catenary system. The Borough requests the requirement for a redundant power feed to the substation be reviewed.
- a. NJT is proposing to run a redundant power source to the substation by way of fifteen 60’ tall telephone poles, directly adjacent to a residential neighborhood.
 - b. As stated above, wayside power is not deemed a critical component or necessary for operations.
 - c. If a redundant power feed is deemed necessary, Bay Head Borough requests it run underground in a vault system, as all critical feeds are. A protective vault would be consistent with the need for a resilient power delivery system. Especially considering many trees will flank the proposed overhead power feed and may disrupt reliable power delivery during storms.
 - d. The residential area directly adjacent to NJ Transit property was not taken into consideration during the design phase.
 - e. The height, location and orientation of the power feed may harm some of the many waterfowl & bird species that land and take refuge in Twilight Lake during migrations.