



March 26, 2024

Ms. Julie Hargrave
Principal Environmental Planner
Central Pine Barrens Joint Planning & Policy Commission
624 Old Riverhead Road
Westhampton Beach, NY 11978

RE: Request for No-Development Determination
PSEG Long Island | Power-On Pole Replacements Project

Dear Ms. Hargrave:

Land Use Ecological Services, Inc., on behalf of PSEG Long Island, as agent for Long Island Lighting Company d/b/a LIPA, a wholly owned subsidiary of Long Island Power Authority, is requesting confirmation that work proposed within the Compatible Growth Area (CGA) and the Core Preservation Area (CPA) of the Pine Barrens does not constitute “development” as per NYS ECL Article §57-0107(13). PSEG is proposing the in place replacement of existing utility poles in four (4) project areas, as follows:

- Circuit 8DR-426 (43283) – 36 poles to be replaced along Lakeside Trail, Manhasset Trail, and Oakview Trail on the east side of Lake Panamoka, Ridge. All 36 poles are within the CGA. [Map R-1]
- Circuit 8DR-426 (47344) – 31 poles to be replaced along NY Route 25 (Middle Country Road) in Calverton. There are 8 poles in the CGA and 23 poles in the CPA. [Map C-1]
- Circuit 8M-7P2 – 32 poles to be replaced along NY Route 25A and Radio Avenue in Rocky Point and Sound Beach. All 32 poles are within the CGA. [Map SB-1]
- Circuit 8XR-645 – 121 poles to be replaced along Whiskey Road, Miller Place-Yaphank Road, Jonah Road, Radio Avenue, and Coram-Sweezeytown Road in Coram, Middle Island, Miller Place, Ridge, and Rocky Point. There are 114 poles in the CGA and 7 poles in the CPA. [Map MI-1]

Poles to be replaced are located within mowed/maintained strips along each of the road right-of-ways. Representative photos for each circuit are enclosed. Existing and new poles are timber; new poles will be southern yellow pine. Existing poles are 30-50 feet in height; new poles are 40-50 feet in height. For all poles, height will not increase by more than 10 feet with replacement. For example, 30 foot poles will be replaced with 40 foot poles; 35 foot poles will be replaced with 40-45 foot poles; and poles 40-50 feet in

height will be replaced with 50 foot poles. New poles will be the same/similar class/diameter, with a maximum increase of 2-3 inches in diameter versus existing.

All equipment will remain on the paved roadways during pole replacement, with some setup and outriggers to be placed on the mowed/maintained strips along each of the circuits. There will be no disturbance to naturally vegetated areas, or to trees or woody vegetation. Areas of disturbance will be reseeded per NYSDOT and/or Suffolk County specifications, utilizing native grass mix where appropriate.

Please note that these pole replacements are part of the Power On Storm Hardening Program, and is maintenance of existing overhead electric lines. Undergrounding these circuits, or portions thereof (such as portions within the CPA), is not feasible due to cost and logistics, as well as the potential to disturb more of the CPA than the proposed pole replacements depending on the method of undergrounding. The Power On program has funding specified for pole replacements, with no funding available for undergrounding. PSEG poles are utilized by other utilities, which themselves do not have the resources or requirement to underground, so logically undergrounding is not feasible.

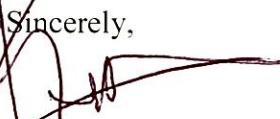
In accordance with ECL § 57-0107 (13), the project as described is classified as one or more of the following, and therefore, does not constitute development:

- (i) *Public improvements undertaken for the health, safety, or welfare of the public. Such public improvements shall be consistent with the goals and objectives of this article, and shall include, but not be limited to, maintenance of an existing road or railroad track.*
- (ii) *Work by any utility not involving substantial engineering redesign for the purpose of inspection, maintenance or renewal on established utility rights-of-way or the likes, and any work pertaining to water supply for the residents of Suffolk County.*
- (vi) *Work by a utility performed for the purpose of public health, safety, or welfare and consistent with the goals and objectives of this article.*

Based on the information provided, I respectfully request that the Commission confirm in writing that the project is classified as “non-development” at the next meeting scheduled for April 17, 2024. In support of this request for a non-development determination, I have enclosed circuit maps showing the poles to be replaced, as well as representative photographs of the poles/circuits.

If you have any questions or require additional information to enable review and confirmation of no development, please contact me at (631) 727-2400 or krisotto@landuse.us. Thank you.

Sincerely,


Kelly Risotto
Principal

Enc.
Via Priority Mail and Email



April 17, 2024

Kelly Risotto
Principal
Land Use Ecological Services Inc.
570 Expressway Drive South, Suite 2f
Medford, NY 11763

**RE: PSEG Transmission Pole Replacements
Central Pine Barrens Compatible Growth Area and Core Preservation Area**

Dear Ms. Risotto:

On March 28, 2024, the Central Pine Barrens Commission received materials on the referenced proposal. The submission included a letter, maps and photographs of pole replacement locations in Ridge, Calverton, Rocky Point, Sound Beach, Middle Island and Miller Place.

The Proposed Action involves the replacement of a total of 220 utility poles including 190 in the CGA and 30 in the Core Preservation Area.

Existing and new poles are timber. Poles range in height from 30 to 50 feet. A new pole will be no taller than 10 feet above its present height. Pole diameter will not increase more than 2 to 3 inches wider.

Poles are located in the mowed grass roadside right of way. The referral material states no trees will be removed. The activity is part of the Power On Storm Hardening Project. The material indicates that underground installation is not feasible due to cost and logistics.

As proposed, the activity appears to constitute "non-development" pursuant to New York State Environmental Conservation Law Article 57 Section 57-0107.13(ii) which states, "Work by any utility not involving substantial engineering redesign for the purpose of inspection, maintenance or renewal on established utility rights of way or the likes,"... No further review from this office is required.

If the proposed activity changes, including the need to remove trees, please notify this office and forward the updated information for Commission review prior to implementation as the revised project may constitute development.

It is encouraged that, where possible, the new pole heights remain within the heights of surrounding trees to maintain the character of the Core and CGA.

Thank you for your attention, and if you have any questions, please do not hesitate to contact me at (631) 218-1192.

Sincerely, *Julie Hargrave*
Julie Hargrave
Policy and Planning Manager

cc: Judith Jakobsen, Executive Director
John C. Milazzo, Counsel

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