

Sunrise
Wind

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Eversource

Section 8.4 - PUBLIC

Disadvantaged Community Impacts



Portions of this proposal contain confidential, proprietary, and/or commercially sensitive information which has been redacted from the "Public Version" of this proposal. Sunrise Wind has submitted a "Confidential Version" of this proposal which includes the redacted information, and which should be treated as a non-public record that is exempt from disclosure to the extent permitted under applicable laws and/or as expressly set forth in the Request for Proposals.

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List of Acronyms

[REDACTED]	[REDACTED]
CLPCA	<i>Climate Leadership and Community Protection Act</i>
[REDACTED]	[REDACTED]
DAC	Disadvantaged Communities
EJ	Environmental Justice
GEI	Gender-Equality Index
[REDACTED]	[REDACTED]
M.A.P.P.	Multi-craft Apprenticeship Preparation Program
NABTU	North America’s Building Trades Unions
NOWTC	National Offshore Wind Training Center
NYSERDA	New York State Energy Research and Development Authority
[REDACTED]	[REDACTED]

8.4 DISADVANTAGED COMMUNITY IMPACTS

6.2.8.4 *Guidance related to Disadvantaged Community impacts is provided in Appendix B.2. The Submission must include both Confidential and Public versions of the Disadvantaged Community Impacts.*

Proposers are expected to explore how they can design their Project and associated investments to provide benefits to and reduce burdens on Disadvantaged Communities in accordance with the 2020 CES Modification Order and the Climate Action Council's Scoping Plan. All Proposers are required to fully detail the benefits and burdens associated with the impacts of the Project's development on any Disadvantaged Communities that are hosting a Project or whose local economy, infrastructure, and air, water, and other natural resources are directly impacted by a Project, as identified through engagement with Disadvantaged Communities, and in accordance with the most recent relevant guidance per the Climate Action Council and Climate Justice Working Group. Proposers are further advised to review the New York State Disadvantaged Communities Barriers and Opportunities Report.

Commitments to Disadvantaged Communities must align or reference those described in the Economic Benefits Plan, according to Appendix B.1 and will be incorporated in Section 6.05 of the Agreement.

8.4.1 Overview

Rather than simply enumerate the benefits and burdens associated with the Project, we will also articulate our understanding of Environmental Justice (EJ) broadly, our own values and vision on achieving equity, our approach on existing projects both in New York and beyond, and how that experience has shaped our commitment going forward. Acknowledging the difficulty and persistence required to “get it right,” our Proposal is reflective of a moment in time, and will continue to evolve and grow as we “inform,” “listen and learn,” and “collaborate” with our stakeholders to better understand the needs of the communities and neighborhoods we seek to serve.

Based on extensive stakeholder conversations thus far, we seek to advance EJ through sensitive infrastructure design and siting, workforce development, and career opportunities that prioritize communities that have been most harmed by environmental injustice, supporting community-led sustainability projects and inviting in community participation to maximize equitable distribution of the Project's benefits.

Environmental Justice

As defined by the *Climate Leadership and Community Protection Act (CLPCA)*, the state must invest or direct resources to Disadvantaged Communities (DAC) such that at least 35%, with a goal of 40%, of the overall benefits accrue to DACs. Under the CLCPA, the state is also required not to disproportionately burden DACs, and to prioritize reductions of greenhouse gas emissions and co-pollutants in DACs.

The Climate Justice Working Group has boldly pursued scoping and defining both the communities that should benefit from this law while further defining the definition of “benefit.” [REDACTED]

Simultaneously, at the federal level, the Biden Administration has established the *Justice40 Initiative* through Executive Order 14088.² With a similar goal and inspired by the CLPCA, *Justice40* seeks to ensure 40% of federal investments reach DACs, especially those relating to clean energy, energy efficiency, clean transit, affordable housing, workforce development, clean water, and legacy pollution.

¹ CJWG Interactive DAC map: <https://www.nyserda.ny.gov/ny/disadvantaged-communities>.

² Executive Order 14008: <https://www.govinfo.gov/content/pkg/FR-2021-02-01/pdf/2021-02177.pdf>.

The CLCPA and the *Justice40 Initiative*, both overall and their specific EJ commitments, were direct results of engagement and input by the EJ community, and it is important to acknowledge that the offshore wind industry and others would not be where they are today without their contributions.

These foundational statutes and policies help inform our EJ and equity goals in New York and beyond.

Our Values

Clean energy projects of the scale and size contemplated in the Proposal cannot and should not be successful if there is widespread community opposition. We know this well and acknowledge the discrimination, racism, redlining, and regulations that have prevented opportunity and wealth building for all neighborhoods throughout our nation and state's history, including the disproportionate impact of climate change. We also recognize the impact of siting, pollution, health impacts, and legacy decisions that created the climate crisis that exists today. That is why we take an "inform," "listen and learn," and "collaborate" approach across the board, including with frontline communities. On numerous occasions, this feedback has led directly to stakeholder-driven changes in our organization's projects—from modifying our onshore footprint based on community feedback to altering our wind turbine generator (WTG) layout based on input from the fishing community—as described further in our Stakeholder Engagement Plan in Section 8.3.

A Comprehensive and Inclusive Approach

As demonstrated in the Project's Stakeholder Engagement Plan, provided as Attachment 8.3-1, we have held hundreds of meetings with groups ranging from small neighborhood associations to large statewide organizations, from city council members to U.S. Senators, to listen and learn about the complex and unique needs and opportunities in communities across New York State. In these engagements, one thing has become crystal clear: "one size does NOT fit all." Therefore, the solutions, commitments, and partnerships should reflect this reality, and local guidance should be included whenever possible. Simply achieving EJ objectives in one or two locations alone is not enough—EJ approaches should be integrated across all aspects of the Project.

The next step after listening to local stakeholders is not action. Rather, it is continued dialogue and engagement. As outlined in the inaugural EJ gathering in 1991, the fifth and seventh principles of EJ affirm the right of self-determination and participation at every level.³ We are committed to sustaining this level of hard work, planning, implementation, and evaluation on an ongoing basis. We recognize that it is not always possible to find areas of agreement or paths to pursue in this stage. However, that does not dissuade us from listening and adjusting our plans as meaningfully as possible.

Finally, after pursuing the previous two steps, we seek partnerships, agreements, programs, and other avenues of mutual agreement. Feedback, revision, updates, and constant dialogue are core pieces of our stakeholder plan broadly, and DAC impacts in particular.

We intend to take this approach throughout the life cycle of the Project to ensure continuous and consistent feedback. Given the importance of responding to and incorporating feedback, it is impossible to suggest we have identified, addressed, and responded to every issue that might arise within and around DACs for the Project. Our experience and knowledge suggest it is just as important to have an openness and process to address these matters broadly as it is to offer pre-conceived solutions to each matter specifically.

³ Principles of Environmental Justice: <https://www.ejnet.org/ej/principles.html>.

Our Approach on Existing Projects

As DaShanne Stokes once remarked, “If your actions don’t live up to your words, you have nothing to say.” While we continually strive to improve our EJ and equity achievements, the Project can be analyzed based not just on what we commit to, but also what we have already achieved. A few of those initiatives are summarized below.

Ørsted has:

- Been designated the first energy firm with a science-based net-zero target as part of the Science Based Targets Initiative;
- Been ranked as the world’s most sustainable energy developer in the world by Corporate Knights (2019–2022, 2024);
- Signed a historic Project Labor Agreement, the National Offshore Wind Agreement, with North America’s Building Trades Unions (NABTU) that prioritizes recruitment of women, people of color, and EJ communities;
- Been awarded the Offshore Wind Leadership (2021) and the Talent Management Leadership (2022) awards from the Business Network for Offshore Wind;
- Launched a global biodiversity partnership with World Wildlife Fund;
- Advanced many more EJ initiatives.⁴

Similarly, Eversource has been recognized as:

- “Newsweek’s America’s Most Responsible Companies 2022”;
- “Top 100 of America’s Most Responsible Companies – Forbes and JUST Capitol 2022”;
- “Bloomberg Gender-Equality Index (GEI) 2022”;
- “HIRE Vets Medallion Award”; and
- A Diversity, Equity, and Inclusion leader in many more respects.⁵

For our projects in New York, we have:

- Held three supplier and workforce forums⁶ to hire local workers (including in Brentwood, NY, a DAC);
- Invested \$300,000 in the Multi-craft Apprenticeship Preparation Program (M.A.P.P.) in Albany’s South End (a DAC);⁷

⁴ Ørsted 2022 ESG Report: [Sustainability & ESG Reports, Ratings & Rankings | Ørsted \(ored.com\)](https://www.ored.com/2022-esg-report).

⁵ Eversource 2022 DEI Report: <https://www.eversource.com/content/docs/default-source/community/2022-eversource-dei-report.pdf>.

⁶ [Supply Forums | Sunrise Wind \(sunrisewindny.com\)](https://www.sunrisewindny.com/supply-forums).

⁷ Sunrise Wind Invests \$300,000 to Train Capital Region Workers for Union Construction Careers in Clean Energy: <https://us.ored.com/news-archive/2022/08/sunrise-wind-invests-to-train-capital-region-workers-for-union-construction-careers-in-clean-energy>.

- Launched a \$10 million National Offshore Wind Training Center (NOWTC) in Brentwood (a DAC).⁸ This Center is controlled by a board of community, labor, and education leaders, rather than our organization;
- Successfully negotiated and executed two Host Community Benefit Agreements for offshore wind transmission, committing nearly \$200 million to host communities over the project lives.
- Signed an \$86 million contract with Riggs Distler for construction and assembly of foundation components at the Port of Coeymans (a port within a few miles of DACs).⁹ Union construction workers will work at this site, and the M.A.P.P. will help to place local residents in these union construction careers;
- Executed onshore construction contracts with local, New York State firm Haugland Energy Group LLC; valued at over \$200 million, they are a supply partner committed to creating workforce opportunities for residents of DACs;
- Changed the spacing of the WTGs and the proposed route of the submarine transmission cable for the South Fork Wind project based on feedback from the fishing community and based the overland route design and work constraints on input from residents and local officials;
- Reconfigured the WTG layout for Sunrise Wind to create consistent 1 NM x 1 NM spacing between turbines across our lease area, a major change based on input from the fisheries industry as well as the marine transportation and navigation community;
- Participated in more than 60 public meetings and 400 stakeholder engagements to share information and take feedback and questions on South Fork Wind and Sunrise Wind; and
- Sponsored numerous events, programs, and organizations over the course of several years that focus on lifting up residents of DACs.

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[REDACTED]

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⁸ NY Governor Press Release on NOWTC to Suffolk County: <https://www.governor.ny.gov/news/governor-hochul-and-suffolk-county-executive-bellone-announce-land-transfer-bring-national>.

⁹ NY Governor Press Release on Supply Chain Award of \$86 Million in Coeymans: <https://www.governor.ny.gov/news/governor-hochul-announces-largest-single-new-york-state-offshore-wind-supply-chain-award-86>.

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[REDACTED]

[REDACTED] recruit and retain workers from frontline communities, low-income, EJ, and otherwise historically disadvantaged communities by partnering with local community-based organizations, elected officials, local governments, non-profits, and others that best know and relate to those qualifying for these opportunities. [REDACTED]

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Sunrise Wind is uniquely positioned to be complete in 2026, delivering enough clean energy to power approximately 600,000 homes each and avoiding 2.45 million metric tons per year of harmful greenhouse gas emissions, in addition to associated co-pollutants.

In NYSERDA’s New York State Offshore Wind Master Plan, “the total emissions-reduction benefit [of the State’s first 2,400 megawatts of offshore wind] would amount to approximately \$1.9 billion (net present value) based on the “social cost of carbon” published by the U.S. Environmental Protection Agency.”¹⁰

¹⁰ *New York State Offshore Wind Master Plan: Charting a Course to 2,400 Megawatts of Offshore Wind Energy.* Accessed at: <https://www.nyseda.ny.gov/-/media/Project/Nyserda/Files/Publications/Research/Biomass-Solar-Wind/Master-Plan/Offshore-Wind-Master-Plan.pdf>.

[REDACTED]