

NYSERDA 2024 OFFSHORE WIND
SOLICITATION ORECRFP24 -1

Community Offshore Wind Application

Public Version



8.4 Disadvantaged Community Impacts

NYSERDA 2024 Offshore Wind Solicitation ORECRFP24-1

September 9, 2024

8.4 Disadvantaged Community Impacts

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List of acronyms and abbreviations

Abbreviation	Explanation
AEP	Annual Energy Production
ALICE	Asset Limited, Income Constrained, Employed
CBO	Community Based Organization
CLCPA	The Climate Leadership and Community Protection Act
DAC	Disadvantaged Community
EJ	Environmental Justice
ESL	English as a Second Language
MOU	Memorandum of Understanding
MWBE	Minority- Women-Owned Business Enterprise
NEW	Nontraditional Employment for Women
NGO	Non-Governmental Organization
NYCHA	New York City Housing Authority
POI	Point of Interconnection
STEM	Science, Technology, Engineering, Math
SDVOB	Service-Disabled Veteran Owned Business

NYSERDA solicitation requirements

Our disadvantaged community impacts section addresses each requirement described in NYSERDA's fifth solicitation for offshore wind energy (ORECRFP24-1).

Table 8.4-1 Solicitation requirements

Solicitation requirement	Section
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	8.4.3.1
Proposer should show a full understanding of the impacts of the Project, including benefits and burdens, presented to Disadvantaged Communities, including Tribal Nations	8.4.3.1
Depict clear areas for collaboration with environmental justice communities and Disadvantaged Communities such that they may offer meaningful input into project design and impacts	8.4.3.2
Proposers must present goals and a strategy for delivering benefits to Disadvantaged Communities.	8.4.4
Jobs and local expenditures claimed as benefits must be described in the context of the Project's targets or other considerations respective to prioritizing Disadvantaged Communities.	8.4.4.2
Detailed barriers assessment, including specific burdens of the Project on local communities informed by direct engagement with the impacted communities. For each barrier or burden, the proposer should address strategies to overcoming the barrier or alleviating the burden	8.4.3
Demonstrate understanding of host or proximate Disadvantaged Communities impacted by the Project through real life encounters and relationship building. Highlight any community advisory partnerships, summarize the stakeholder engagement conducted, and address how the project will prioritize and systematically incorporate feedback from the community regarding project development, construction or manufacturing, and operation into project outputs (examples include host community agreements, Tribal benefit agreements, air quality monitoring campaigns, co-designing measures)	8.4.3.1
Describe any partnerships entered with host or proximate Disadvantaged Communities impacted by the Project in the capacity of a community advisory group or board that guides feedback and input to the Project on a regular basis, ensures community input is being received, and collaborates on any community benefit plan or dissemination of benefits	8.4.4.3
Proposers may wish to further provide testimonials from their community partnerships to provide insights into the Proposer's activities in the impacted communities and serve to verify the data and perspectives identified in the barriers assessment.	8.4.3.2

8.4.1 Summary

As New York transitions to a clean energy economy and looks towards the future of offshore wind, it is essential that the state ensures frontline, low-income, environmental justice (Environmental Justice or EJ), and otherwise historically disadvantaged communities (Disadvantaged Communities or DACs) remain at the forefront of decision making. Throughout history, Disadvantaged Communities have been overburdened by the siting of power plants and other polluting facilities and have missed out on the economic opportunities that have been created in the process. Increasingly, the impacts of climate change have begun to present themselves in new ways. For example, severe wildfires have led to degraded air quality and increased pollution in the form of particulate matter (PM2.5) amplifying concerns in communities [REDACTED], which already experience high rates of youth mortality associated with asthma.¹ The need to mitigate the worst impacts of climate change only increase the urgency with which we must transition to a clean energy future.

As renewable energy development advances, and the associated economic opportunities increase, it is imperative that these opportunities are not only open to Disadvantaged Communities but are proactively structured in a way that provide these communities a seat at the table and the opportunity for economic success. Community Offshore Wind (COSW) has already begun to form meaningful relationships with Environmental Justice communities and Disadvantaged Communities in order to incorporate their input into our project design and gain insight into potential impacts. We have funded pilot programs to support EJ groups, community-based organizations (CBOs), and non-governmental organizations (NGO(s)) that benefit individuals in DACs. We know that small changes can result in significant impacts and early support and engagement can lead to trusted partnerships. As an equitable and responsible developer of offshore wind, we will ensure that our Project delivers benefits to DACs, mitigates historic barriers and burdens, invests in long-term relationships, and creates long-term partnerships with host communities.

[REDACTED] These benefits will be delivered through our four-pillared approach of community benefits:

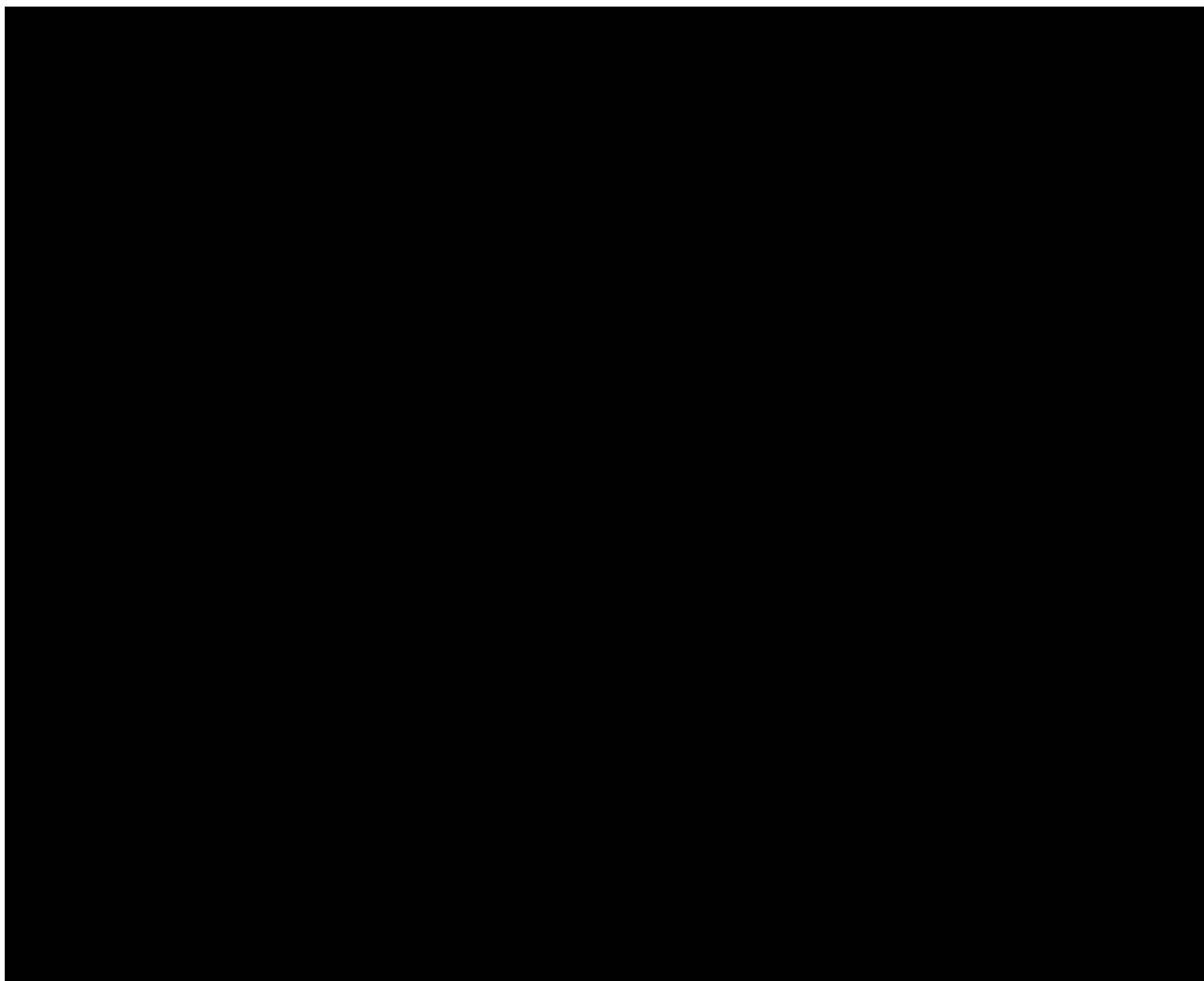
1. Design and invest to minimize burdens and impacts - proactively minimizing impacts on our host communities through our onshore construction and operations. While our priority is to avoid impacts on communities, we acknowledge that there will be unavoidable impacts during the development and construction of the Project. We have selected onshore cable routes and landfalls causing the least amount of disruption to Disadvantaged Communities, and where disruption is inevitable, we have planned to utilize efficient equipment and coordinate activities with other developers and/or municipalities to have minimal additional impact
2. Maximize Benefits from project-specific expenditures and labor - through strategic sourcing and internal hiring targets [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

¹ https://www.health.ny.gov/statistics/ny_asthma/pdf/2018-2019_asthma_burden_nyc.pdf
[REDACTED]

3. Targeted community-focused investments – [REDACTED]

Additionally, a portion of the benefits associated with environmental and fisheries programs [REDACTED] and our host community benefit agreements [REDACTED] will accrue to Disadvantaged Communities.

4. Recognizing the intrinsic benefits of responsible clean energy development – our Project will help to displace fossil generation resulting in reduced climate emissions and criteria pollutants.



These commitments along with the experience of our joint venture, demonstrate why COSW is best suited to develop a project that prioritizes the needs of Disadvantaged Communities. Community is not only in our name but engrained in the ethos of our parent companies. National Grid is a New York company that knows how to engage with communities, minimize impacts, and ensure that their concerns are addressed. RWE is the second largest offshore wind developer in the world with a proven record of engaging and partnering with impacted communities, and making sure that stakeholders are not only heard, but also see the results of their inclusion. It is a priority of our joint venture to develop an offshore wind project for the State of New York that delivers on the promises of transparency, inclusion, and equity; to truly live up to the name, COSW.

8.4.2 Our legacy and expertise

COSW is able to leverage the experience and backing of its parent companies to inform and deliver meaningful benefits to Disadvantaged Communities in New York.

National Grid

National Grid has a long track record of supporting communities in New York State. National Grid supports programs designed to help improve the way people live, work, and play, with social responsibility at the core of its DNA. In 2021, National Grid donated \$6M throughout NYS communities via its Corporate Citizenship, Jurisdiction, and Customer and Community program; and an additional \$1.4M in NYS communities through the National Grid Foundation.

In October 2022, National Grid launched the “Winter Customer Savings Initiative” to help customers reduce their energy use and save money, manage bills, and secure available energy assistance. One of the bill management programs offered by National Grid includes the Budget Plan, which is designed to reduce uncertainty and volatility in monthly energy bills by having a fixed monthly payment schedule based on annual consumption. This helps in offsetting high seasonal bills and makes it easier to anticipate monthly energy costs while planning household budgets. As part of this effort, National Grid allocated \$10M in payment-assistance funding opportunities to New York State customers (out of a total funding of \$17M) through federal agencies and regional non-profits. In addition, National Grid has designed special initiatives for low-income families and customers needing special assistance to meet their energy needs.³ Other programs include but are not limited to:

- The Home Energy Assistance Program (HEAP), or the Fuel Assistance Program, helps income-eligible households to pay their heating bills via federally funded grants.
- Discount Rates provides qualifying income-eligible customers to receive a discounted rate on electric and gas service, as well as no-cost energy efficiency upgrades.

National Grid’s track record of strong relationships, and partnerships in these communities proves that our commitment to Disadvantaged Communities goes much further than what is proposed here. Numerous National Grid employees sit on various non-profit boards throughout the State, volunteering their time and talent to ensure that the missions of statewide NGOs are brought to life. We at COSW intend to do the same and carry on that legacy.

RWE

RWE has been developing and operating windfarms for 20 years and is responsible for providing clean and green energy to households across Europe and the US. One of the core tenets of RWE is making sustainable impact on the local communities in which it operates, which is evident across all projects, as indicated in selected example initiatives below from some offshore wind projects:

- Development of a local community fund [REDACTED] in Gwynedd (Wales) to make sustainable impact on the development of Northern Wales throughout the lifetimes of its project. The fund will be administered by a local NGO in collaboration with local officials, and aims to reduce inequality in the local community, develop strong growth, and build sustainable communities.

³ Details at ngrid.com/heretohelp

- Funding of decarbonization projects in local communities to promote energy efficiency and facilitate clean energy transition in an equitable manner, e.g. Brechfa Forest Wind Farm Community Fund is funding community buildings to make infrastructural improvements to reduce carbon footprint and electricity costs, providing sustainable transportation, and other local benefits.

With nearly 200 projects in 24 states, RWE has also made significant investment in rural communities around the US, where they have provided local jobs and increased tax revenue with every clean energy project. RWE recently assisted more than 45 local organizations, such as first responders, regional and local food banks and food pantries, social services for senior citizens, and local schools with student food programs in those communities.

8.4.3 Our philosophy on engagement with DACs

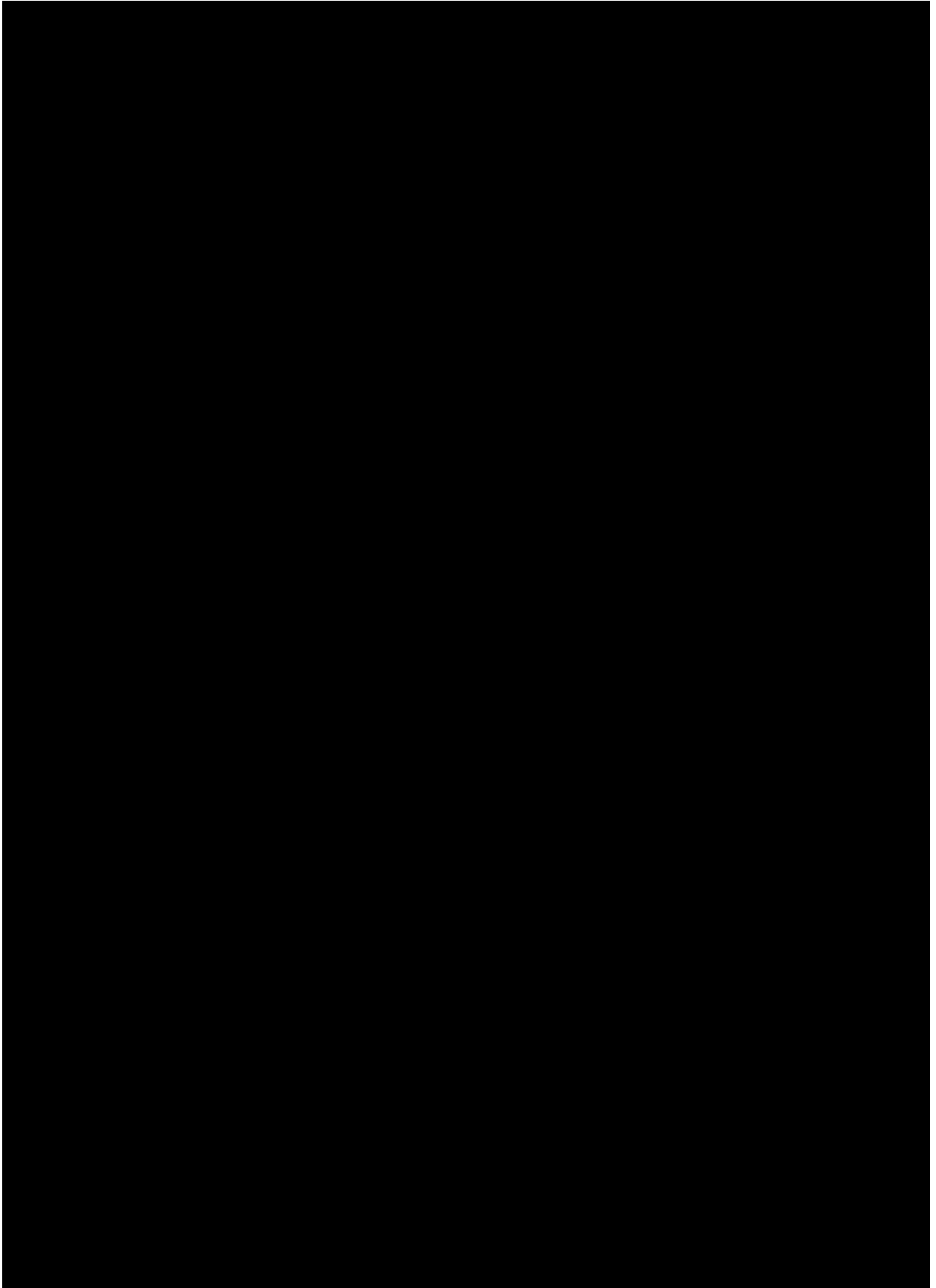
The Climate Leadership and Community Protection Act (CLCPA) has defined DACs as “communities that bear burdens of negative public health effects, environmental pollution, impacts of climate change, and possess certain socioeconomic criteria, or comprise high concentration of low- and moderate-income (LMI) households.”⁴ The CLCPA is primarily focused on the intertwined issues of equity and climate change and asserts that the actions taken by the State of New York to mitigate the impact of climate change should prioritize the allocation of public investments to Disadvantaged Communities. As we usher in a new era of clean energy, COSW is committed to ensuring equitable economic opportunities, and minimizing impacts to these DACs. We have utilized the criteria published by the Climate Justice Working Group and the maps published by NYSERDA⁵ to identify these communities and target partners who can assist in ensuring a just energy transition. We will engage the NYSERDA Regional Clean Energy Hubs [REDACTED], to assist in the delivery of critical information to individuals, small businesses, and affordable housing owners about the benefits of the clean energy economy, ways to reduce energy use and costs, and how to make more informed energy decisions.

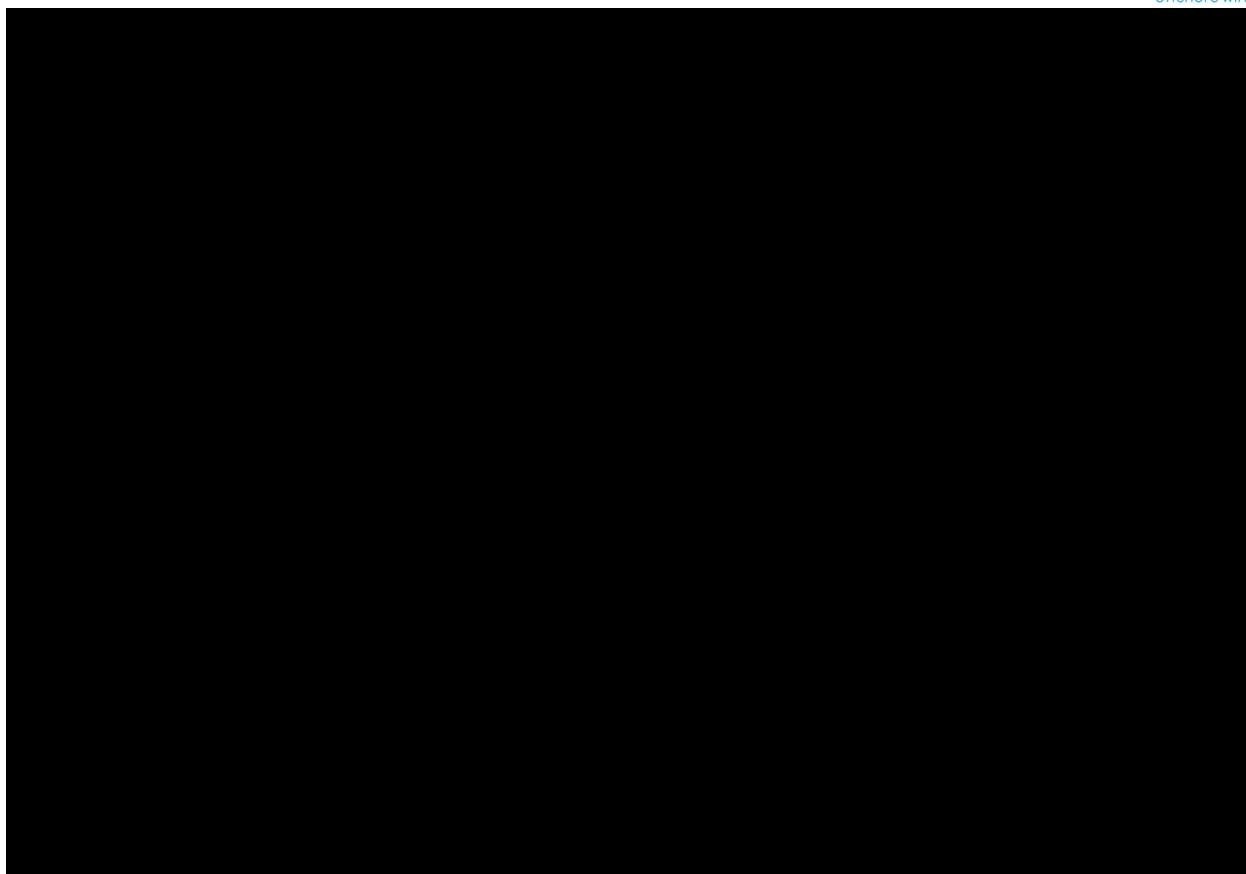
8.4.3.1 Affected DACs

At COSW, we have an ambition to maximize positive impact to DACs. We do this through early identification of DACs impacted by the onshore installation and construction activities of our Project, frequent engagement to build awareness, ongoing communication to stay close to impacted communities, and ensuring we maintain open channels of communication. This approach has helped us explore mitigation opportunities and start a dialogue to develop future partnerships. We have conducted an initial set of community engagement efforts, including one-to-one meetings with local elected officials as well as broader community outreach activities to increase our understanding of the needs of specific communities. Early outreach also helps to establish COSW as an approachable, transparent, and responsible developer. Table 8.4-3 below provides an overview of the host DACs impacted by our onshore construction activities, along with potential impacts and initial stakeholder engagement:

⁴ New York State Climate Action Council (2022). Scoping Plan: Executive Summary

⁵ <https://www.nyserdera.ny.gov/ny/disadvantaged-communities>





8.4.3.2 Our engagement with DACs

Since our inception, COSW has been involved in a host of community outreach efforts to directly address the socioeconomic inequities faced by low- and medium-income households, including EJ and Disadvantaged Communities. We have funded efforts to directly support and alleviate the everyday struggles of these communities, ranging from donations of fresh seafood and winter coats to conducting informative events for school students to empower the next generation. A selection of engagements to date are listed below:

- [Redacted list item]
- [Redacted list item]

- [REDACTED]
- [REDACTED]
- **Science, Technology, Engineering, and Math (STEM) and Workforce Development:** We invested over \$100,000 into STEM and Environmental Programs for 1,500+ New York Youth, preparing our future workforce for offshore wind jobs. We have partnered [REDACTED] to donate 2000 books related to STEM and renewable energy to children [REDACTED] as well as local CBOs.
 - **Swim Lessons:** Swimming is a life skill that all children, no matter their socioeconomic status should be proficient in. Teaching today's children how to swim will not only make them safer, it will also prepare them to fill the offshore wind jobs of tomorrow. According to the Department of Health, 4 Black males and females have significantly higher rates of drowning than White or Hispanic males and females. 92 YMCA locations (84%) are located in or near a disadvantaged community. COSW has prioritized safe swimming and with their history of being a pillar in local communities, we have partnered with the YMCA of New York State to provide free swim lessons to K-3 grade children from DACs throughout New York State. As a pilot, we are providing funding to the YMCA Dodge Branch in Brooklyn, to provide swimming lessons to 56 children from PS 307 Daniel Hale Williams in the Navy Yard. Many of these children reside in the Farragut Houses which is across the street.
 - **Clean Energy Hubs:** To help support the Long Island Clean Energy Hub, our Manager of Workforce Development and Equity connected the Hub with individuals from DACs across Long Island to fill their Community Navigator roles. As a result of this relationship and engagement, the Hub has been able to fill those positions with trusted and credible messengers of the community who will bring awareness to the benefits of clean energy.
 - **Experiential Learning on Long Island:** National Grid Ventures staff hosted several experiential learning opportunities for youth in DACs, in partnership with local school districts and community-based youth development organizations [REDACTED] Groups of youth toured existing power plant facilities to learn about site operations and hear about the career journeys of the engineers and operations staff. They also learned about the future transition of the plants to clean energy.
 - **Benefiting from our Partnerships:** [REDACTED]
[REDACTED]
[REDACTED] Through this relationship, we hired [REDACTED] community coordinator, one of the careers available on an offshore wind project starting from the project planning phase.

Stakeholder engagement success story: COSW and Brooklyn Public Library Partner to Distribute 3,200 STEM-Focused Books to Brooklyn Families

COSW and Brooklyn Public Library (BPL) partnered to distribute 3,200 books focused on STEM subjects to families living in the Red Hook Houses and the Farragut Houses, two public housing projects in northwest Brooklyn.

"COSW is committed to helping New York families access the education and development opportunities needed for the clean energy jobs of the future," said Doug Perkins, President and Project Director of COSW. "By partnering with the BPL, we can help spark an interest in STEM subjects among children in Brooklyn and put them on a path toward clean energy education. We'll also help them start or build their home libraries and inspire a life-long love of learning."



Pictured left: Head of Engineering, Brian O'Boyle reads *Ada the Scientist* during Black History Month at the Brooklyn Heights library.

Pictured right : COSW, Brooklyn Public Library, and NYCHA Housing staff at book distribution event.

As our Project matures, we will continue to engage with these communities not only through programming but through a variety of methods, including public open houses, informative forums and workshops, and through our social media channels. We have already participated in 9 NYSERDA Open Houses in New York with additional events planned [REDACTED] prior to our NYS Article VII submission.

[REDACTED]

[REDACTED] We will engage with local community-based organizations to make sure that Disadvantaged Communities are represented [REDACTED] and that we are disseminating information in a manner that is accessible for all. In addition, we have developed a list of accessibility measures to increase participation of residents from DACs in ongoing stakeholder dialogue, setting them up for success while making decisions directly impacting their future. Some examples include providing incentives for attending meetings (lunch, dinner, uber gift cards) and holding meetings in community centers that already have childcare centers in them so that community members can participate in meetings without distractions and not have the burden of finding childcare in order to participate.

8.4.4 Commitments to DACs

We have developed a customized approach for addressing the challenges faced by DACs, both caused directly by our Project, and by historic inequity of economic opportunities, to ensure they are positioned to succeed in the clean energy transition. [REDACTED]

[REDACTED] These benefits will be delivered through our four pillars: (1) designing and investing to minimize burdens and impacts, (2) maximizing benefits from project-specific expenditures and labor, (3) targeted community-focused investments, and (4) recognizing the intrinsic benefits of responsible clean energy development which have been identified to address the concerns we have heard during our engagements and those highlighted in the Climate Justice Working Group report and CLCPA.

Our Disadvantaged Community benefits pillars are aligned with the benefit categories identified in Appendix B.2 of the RFP. Project-specific expenditures and jobs are estimated according to the methodology prescribed for Category A benefits, our community-focused investments align with the Category B benefit definition, and other intrinsic benefits are estimated, to the extent practicable, in accordance with Category C benefits methodology.

COSW will leverage the expertise of its parent companies, in delivering community impact. We are committed to coordinating with NYSERDA in to deliver and verify our commitments. We will utilize the tracking and verification mechanisms identified in Section 10 for economic benefit commitments, as well as internal success metrics to measure stakeholder engagements, to communicate updates and progress of our impact to NYSERDA.

8.4.4.1 Design and invest to minimize burdens and impacts

COSW has taken proactive steps in our Project design to minimize disruption to host communities, and where disruption is inevitable, has designed specific investment initiatives to maximize positive impacts.

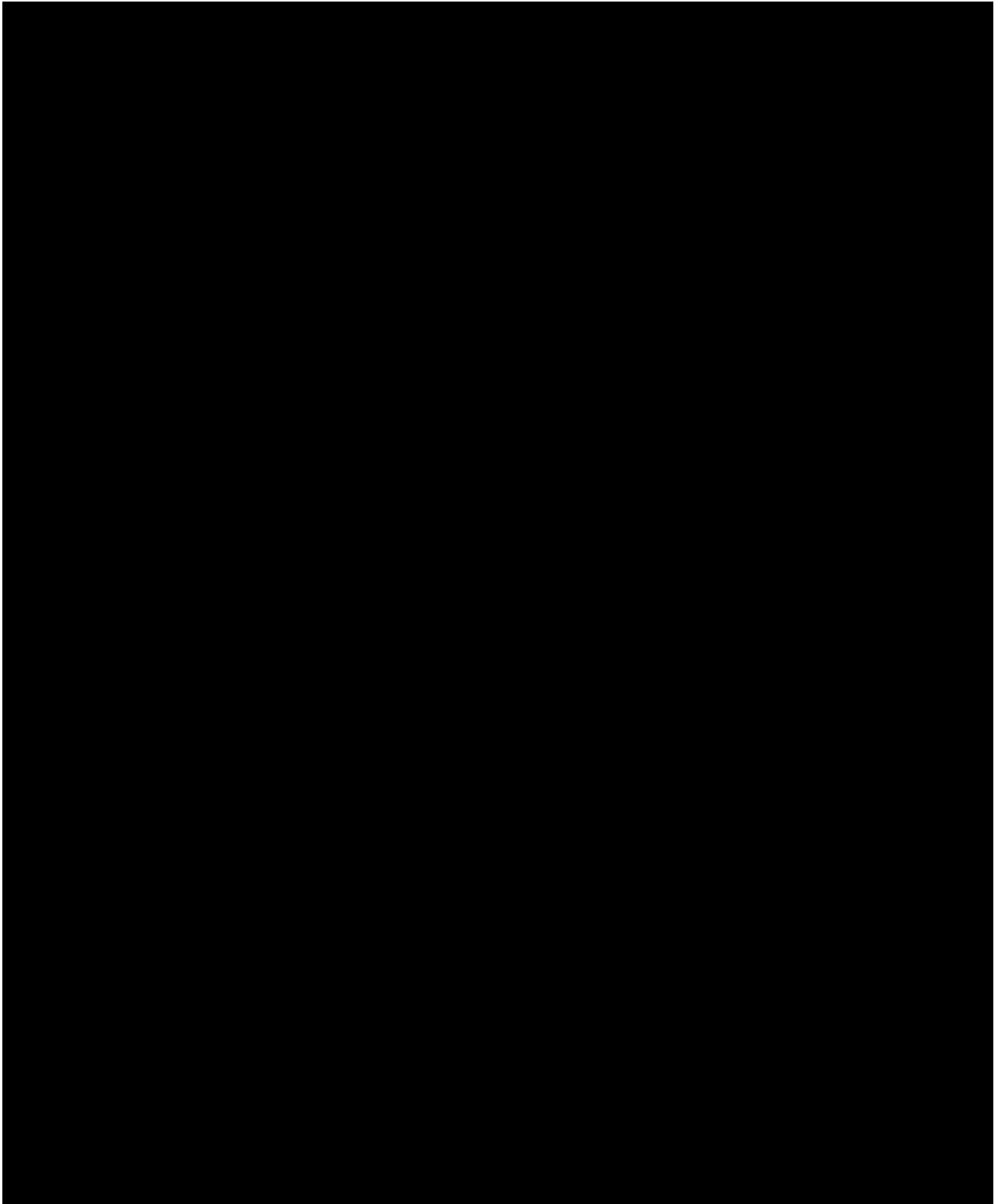
Informed Route Selection

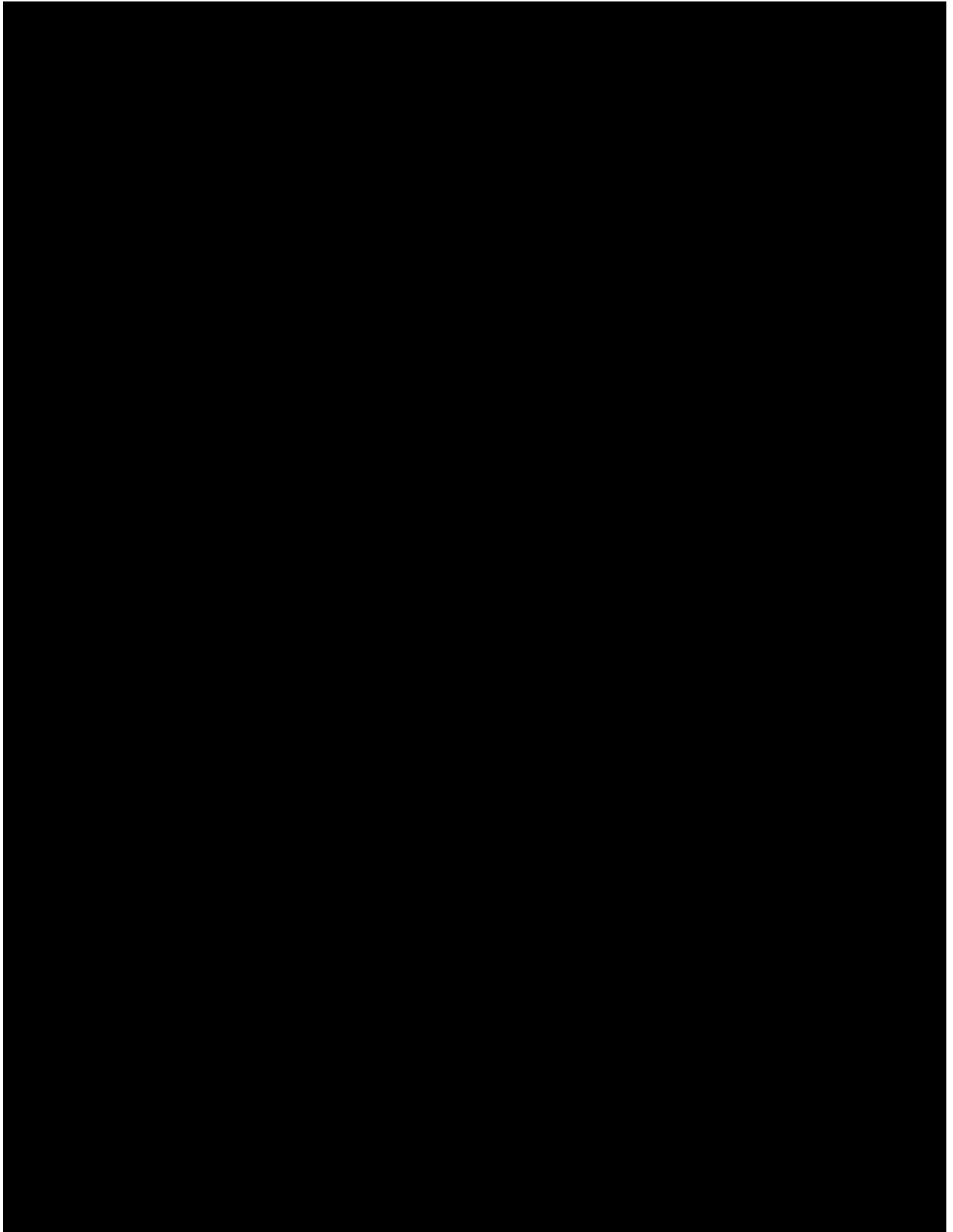
We anticipate minimal impacts from our onshore construction activities as a result of the careful selection of our onshore cable route that avoids crossing densely populated DACs, with very few exceptions, [REDACTED]

COSW engineers and consultants analysed six different routes [REDACTED] and have chosen a preferred route based on a variety of environmental and infrastructure criteria, including but not limited to:

- EJ/DAC community, Parks, Public Housing, Schools, (passing in front on road) Faith- Based Buildings (passing in front on road), Estuarine and marine wetland, traffic, which were then graded on a 1-10 scale.

Utilizing data [REDACTED] showing impacts to DACs (income levels, asthma hospitalization rates, and food insecurity) we added additional dimensions to the route selection criteria. These routes will be further refined by public input through the NYS Article VII process.





Additional mitigating measures

In addition to informed route selection, we have developed and prioritized an initial list of mitigating measures to minimize disruption from our onshore construction activities:

- We have performed a street-by-street analysis of community boards, community-based organizations, faith-based organizations, schools, day-cares, businesses, and parks that we plan to engage with over the course of our Project, as well as host community meetings and open houses to ensure complete transparency early and often.
- We will work with local municipalities and stakeholders to coordinate our efforts with ongoing work and provide sufficient and timely communication to impacted businesses/households before beginning major activities.
- [REDACTED]
- Prioritization of efficient equipment: We ensure minimal noise pollution and disruptions to traffic from construction activities, e.g., horizontal directional drilling (HDD) technology.
- Minimize long-term impact: Our aspiration is to coordinate with other developers in our onshore activities to ensure minimal disruption to the same location from successive projects.

As the Project develops, COSW will continue to engage with local communities, [REDACTED], optimizing transmission routes to further reduce impacts and develop construction plans by incorporating feedback from affected people (as recommended by Article VII).

8.4.4.2 Maximize benefits from project-specific expenditures and labor

COSW is committed to keeping Disadvantaged Communities at the forefront of the clean energy transition and is proactively delivering on this ambition by creating equitable economic opportunities for these communities. We aim to accelerate employment and economic opportunities through two concrete avenues: prioritize hiring locally to deliver a sustainable and lasting impact, and purchase materials and equipment locally from within these DACs to also generate positive spillover effects. Our supply chain strategy is characterized by ensuring transparency and accessibility to opportunities for local and small businesses. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8.4.4.3 Targeted community-focused investments

COSW is dedicated to delivering direct benefits to DACs through targeted community-focused investments. [REDACTED]

8.4.4.3.1 Community Benefits Fund

COSW has developed a Community Benefits Fund which will include funding to be invested within Disadvantaged Communities impacted by the Project to directly improve their everyday quality of life. Funding priorities and allocations will follow a community-led investment approach by working with impacted communities to identify the highest value investments. We have developed an initial list of potential programs, based on conversations with community leaders to date. Potential opportunities for support include:

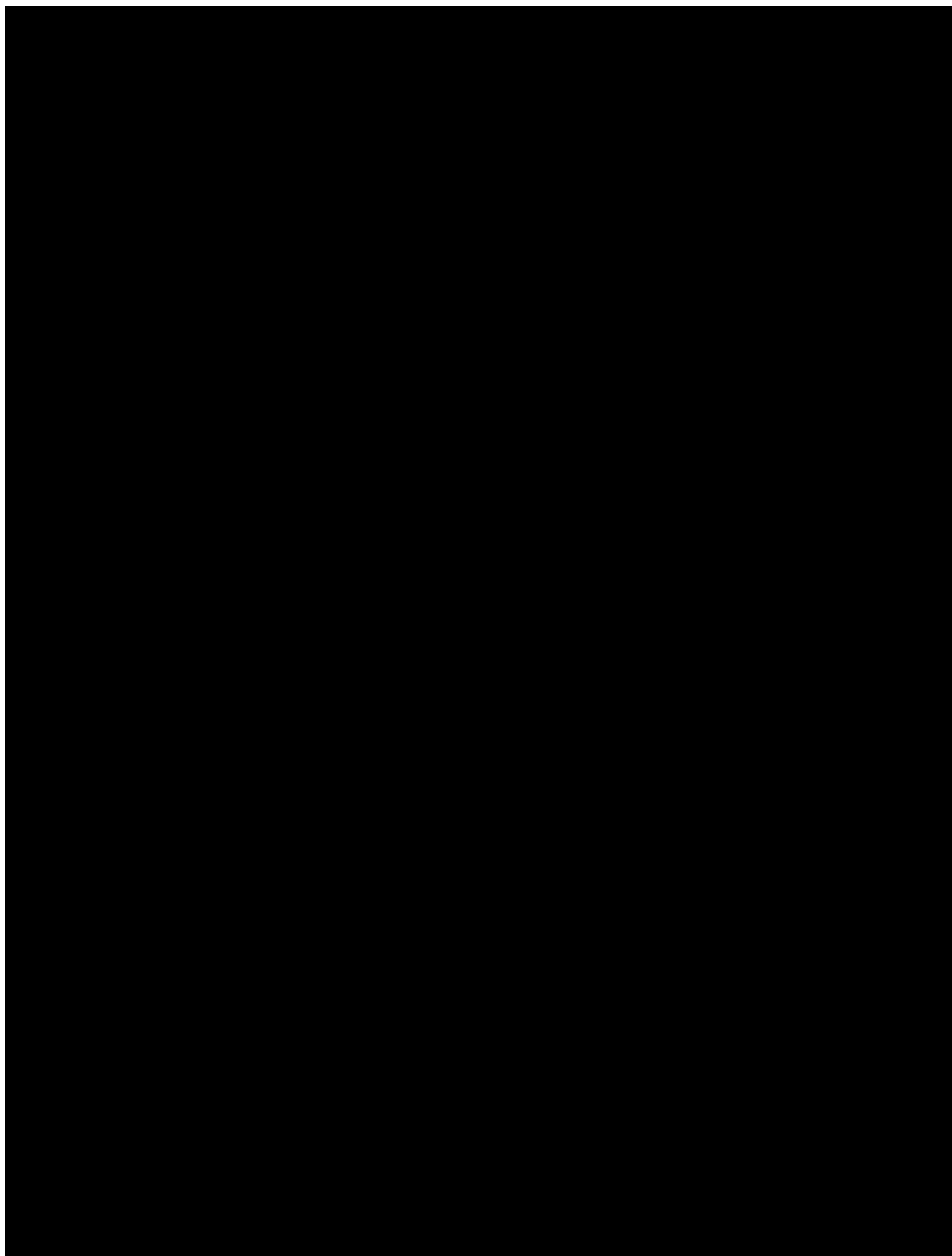
- Funding to support energy efficiency and electrification. New Yorkers, especially those in DACs, see the benefit of growing electrification and clean energy. However, additional support is required to ensure equitable opportunities to access these technologies. As part of COSW's host community agreements, this fund is designed to help cities and towns transition away from fossil fuels and help to electrify transportation and housing in these communities. These investments may include, but are not limited to, electrification of local fleets including school busses, publicly accessible electric vehicle charging stations, and funding for converting low income and public housing to electric sources such as air source heat pumps. This program is not meant to be prescriptive, but rather is an opportunity to work with impacted communities to mitigate project impacts while reducing carbon emissions, supporting local climate goals, and improving the quality of life for residents of these communities.

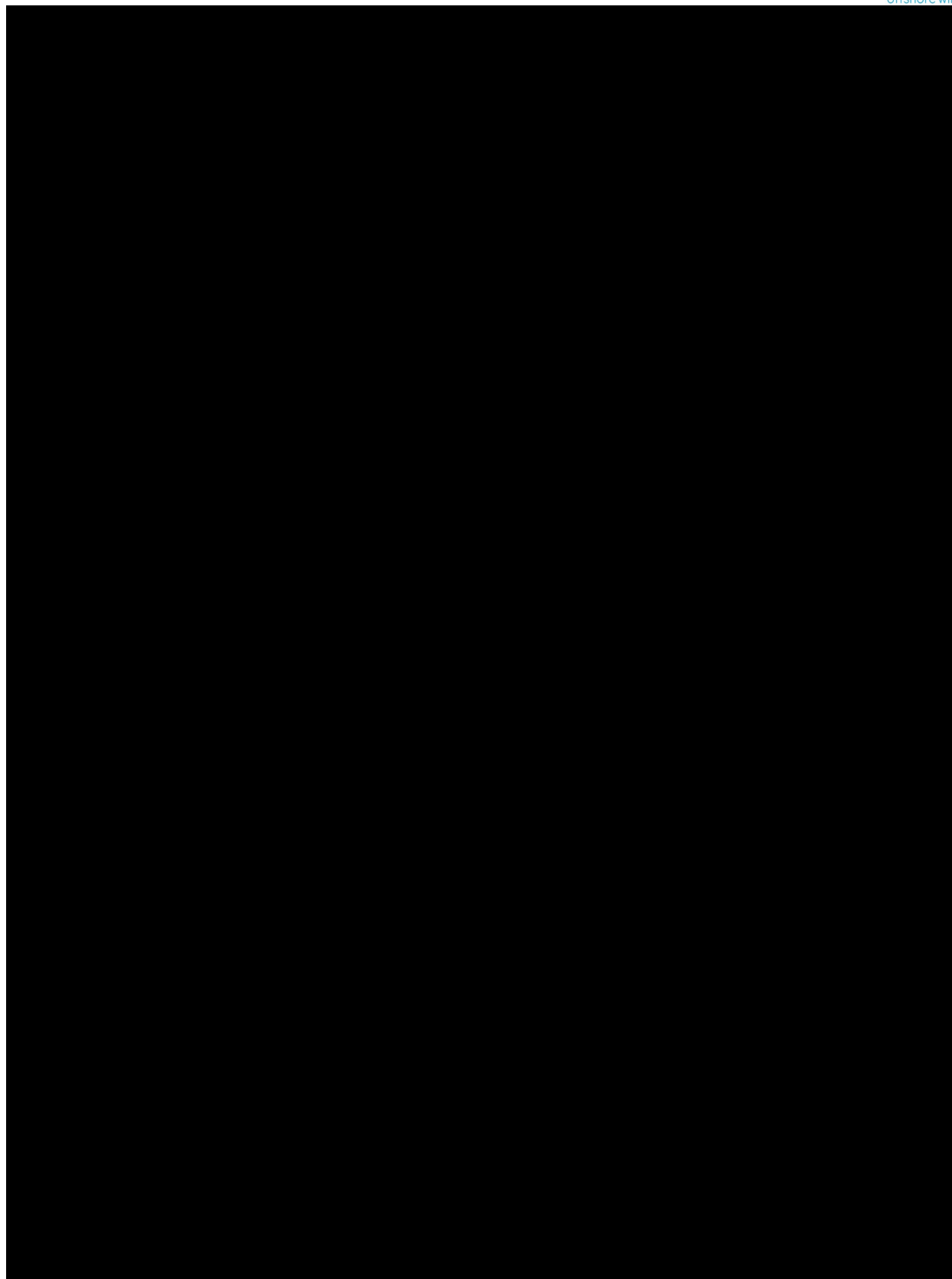
[REDACTED]

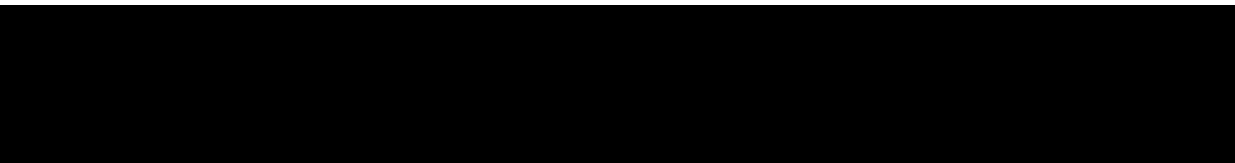
- 'Investments in Green-ification' and parks. [REDACTED]

[REDACTED]


8.4.4.3.2 Funds to enable and empower communities





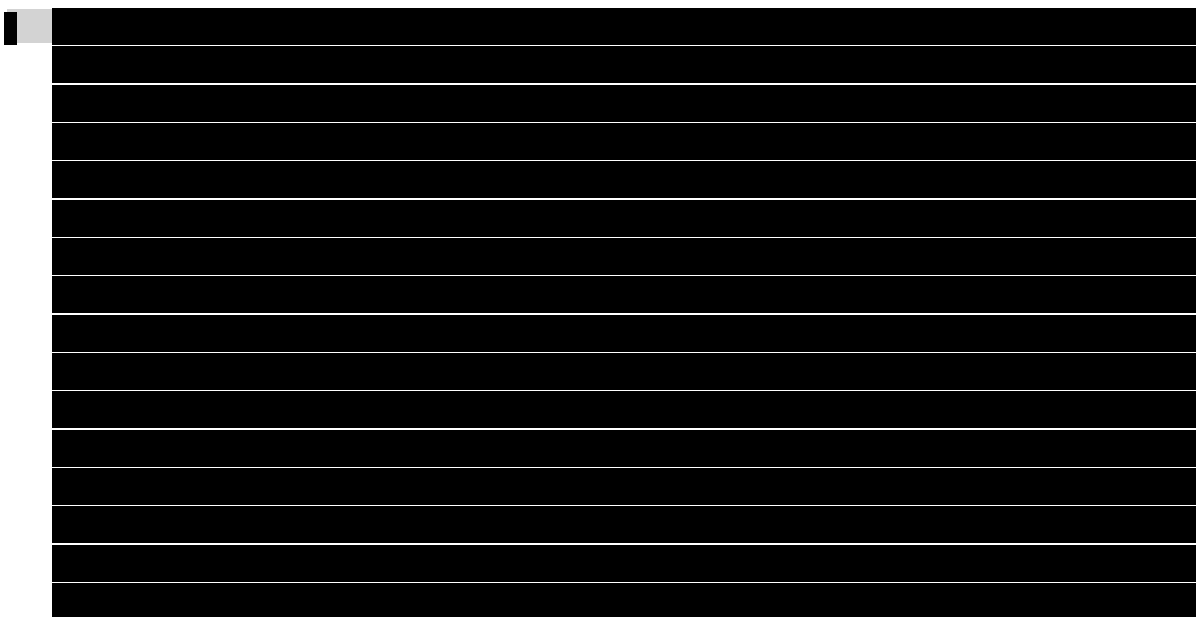


Disadvantaged Communities are primarily hindered by four key barriers in accessing clean energy services prescribed by the CLCPA. These include: limited access to physical and socio-economic structures, lack of financial and knowledge-related resources and capacity, lack of awareness, and complex programmatic design further limiting their participation and success.

COSW aims to address such barriers by providing economic opportunities to these communities. We will fund workforce development programs to enable individuals to meaningfully benefit from employment opportunities created while removing potential barriers and go beyond to invest in building the workforce of the future by funding of youth employment programs. 



The following is an overview of the programs meant to enable current workforce, including DACs.



⁶ https://www.unitedforalice.org/Attachments/AllReports/23UFA_Report_New_York_4.11.23_Final.pdf

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

⁷ <https://www.cnn.com/travel/article/world-most-expensive-cities-economist-2022/index.html>

⁸ <https://www.uprose.org/transportation-justice>

⁹ https://www.urban.org/sites/default/files/publication/101820/long20island20racial20equity20through20economic20advancement_1.pdf

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹⁰<https://www.nyc.gov/site/planning/about/language-access.page#:~:text=New%20Yorkers%20come%20from%20every,persons%2C%20are%20not%20English%20Proficient.>

[REDACTED]

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Fisheries and environment funding

Building on COSW's Fisheries Mitigation Plan (Section 8.1), we will allocate funding towards a Community Access Program. This program aims to improve access to sustainable seafood for underserved and DACs by providing them fresh, local seafood harvested by New York and New Jersey commercial fishermen. We will leverage existing relationships with commercial and recreational fishermen to help share these benefits with underserved communities, both through donations and more established programs that would include sustained community involvement. In addition, the program will also improve access to recreational fishing opportunities (e.g., through donating/renting fishing equipment, or teaching the skills or education required to participate in such activities).

We have already provided a state-wide seafood donation in 2023 in partnership with local New York fisheries and are in the midst of planning another donation in September 2024 for Hunger Action Month.

[REDACTED]

[REDACTED]

[REDACTED]

8.4.4.4 Recognizing the intrinsic benefits of responsible clean energy development

In addition, COSW is directly contributing towards a reduction in total carbon emissions from the power sector in New York State by supplying renewable energy to the grid. [REDACTED]

[REDACTED]

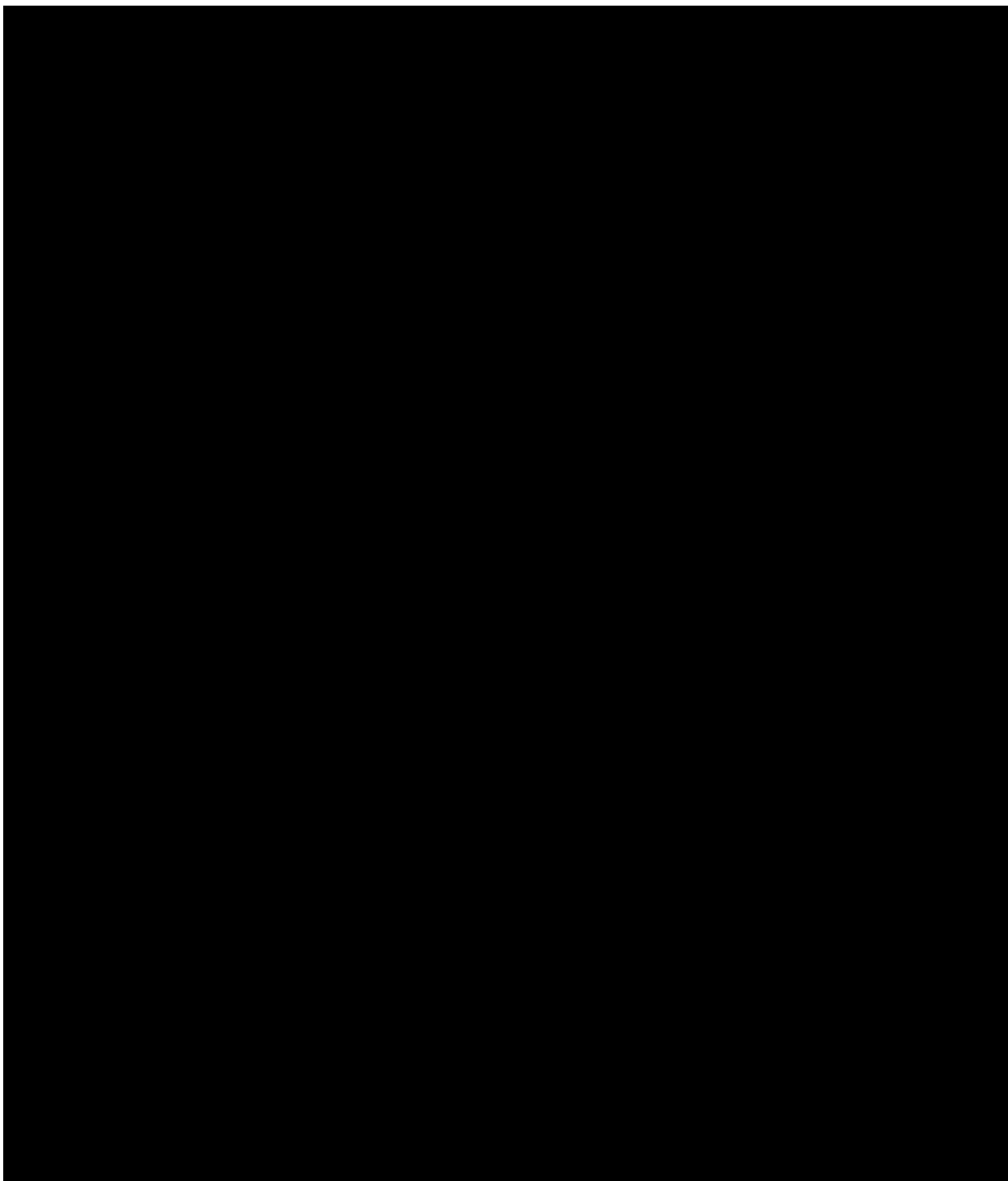
[REDACTED]

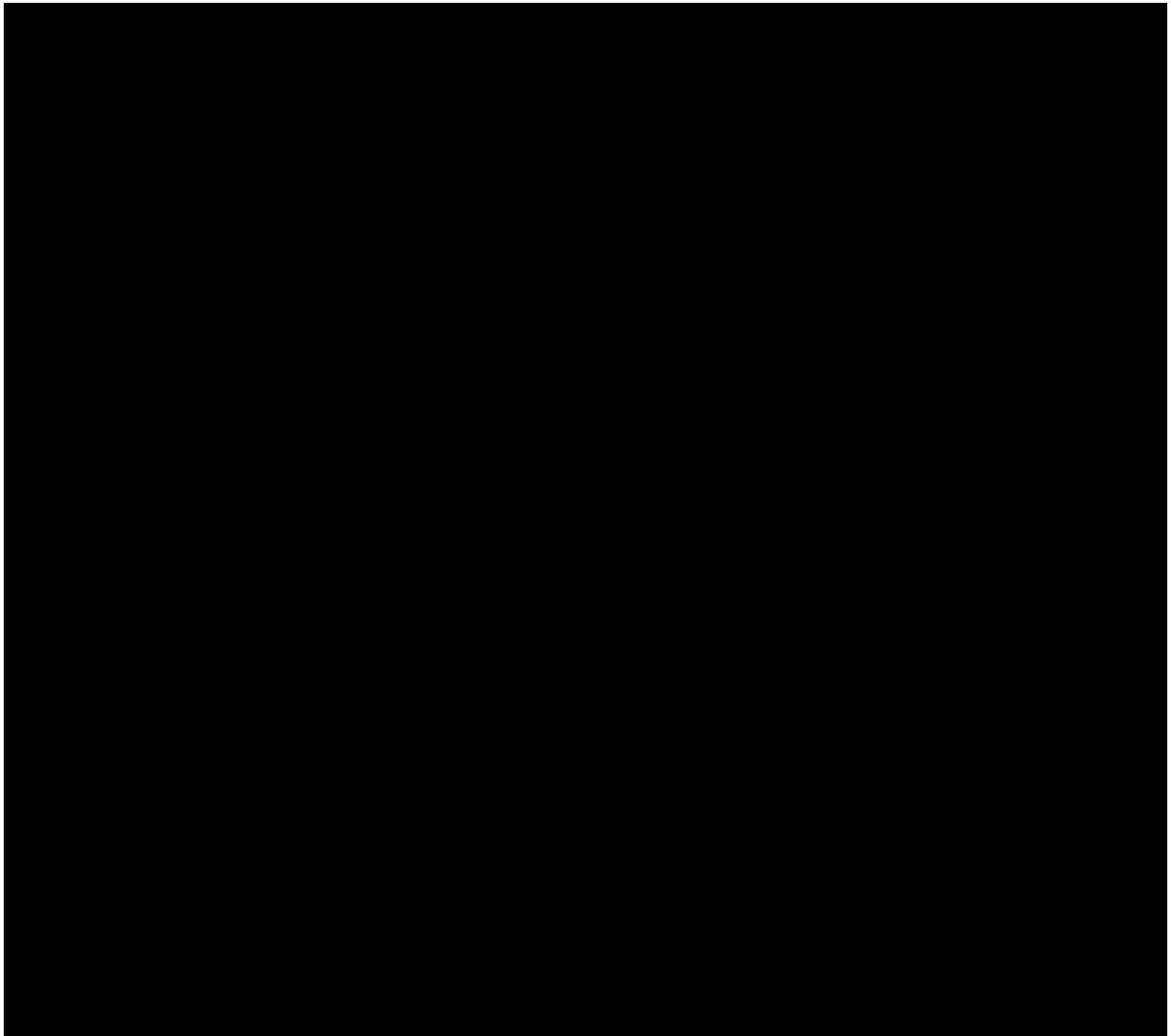
Additionally, the displacement of fossil-fired generation, historically and disproportionately located in or adjacent to DACs, by offshore wind is expected to result in reduced noise and air pollution improving health outcomes. thereby

8.4.4.5 Commitments to Tribes and Tribal Nations

The existing racial wealth divide experienced by Native Americans continues to add to their disenfranchisement and hinders socioeconomic progress. Data provided by the US Census Bureau and the Bureau of Labor Statistics show that although Native Americans have seen exponential population growth and some socioeconomic progress over the last 40 years, they still experience higher unemployment rates and lower educational achievement rates compared to other racial and ethnic groups in the United States. We recognize that in New York State, the Shinnecock Nation is listed as being located in a DAC.

We have learned from our engagement with Tribal Nations that they do not see themselves as a community or stakeholder and we recognize and respect the sovereignty of Tribes/Tribal Nations as set forth in the Constitution of the United States, treaties, statutes, Executive Orders, and court decisions. COSW is committing a portion of all funded programs described in Table 8.4-4 and in Section 11 to Tribes and Tribal Nations.





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SOLICITATION ORECRFP24 -1

Attachment 8.4-1

MOU with



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8.4-1 MOU with



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Attachment 8.4-2

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