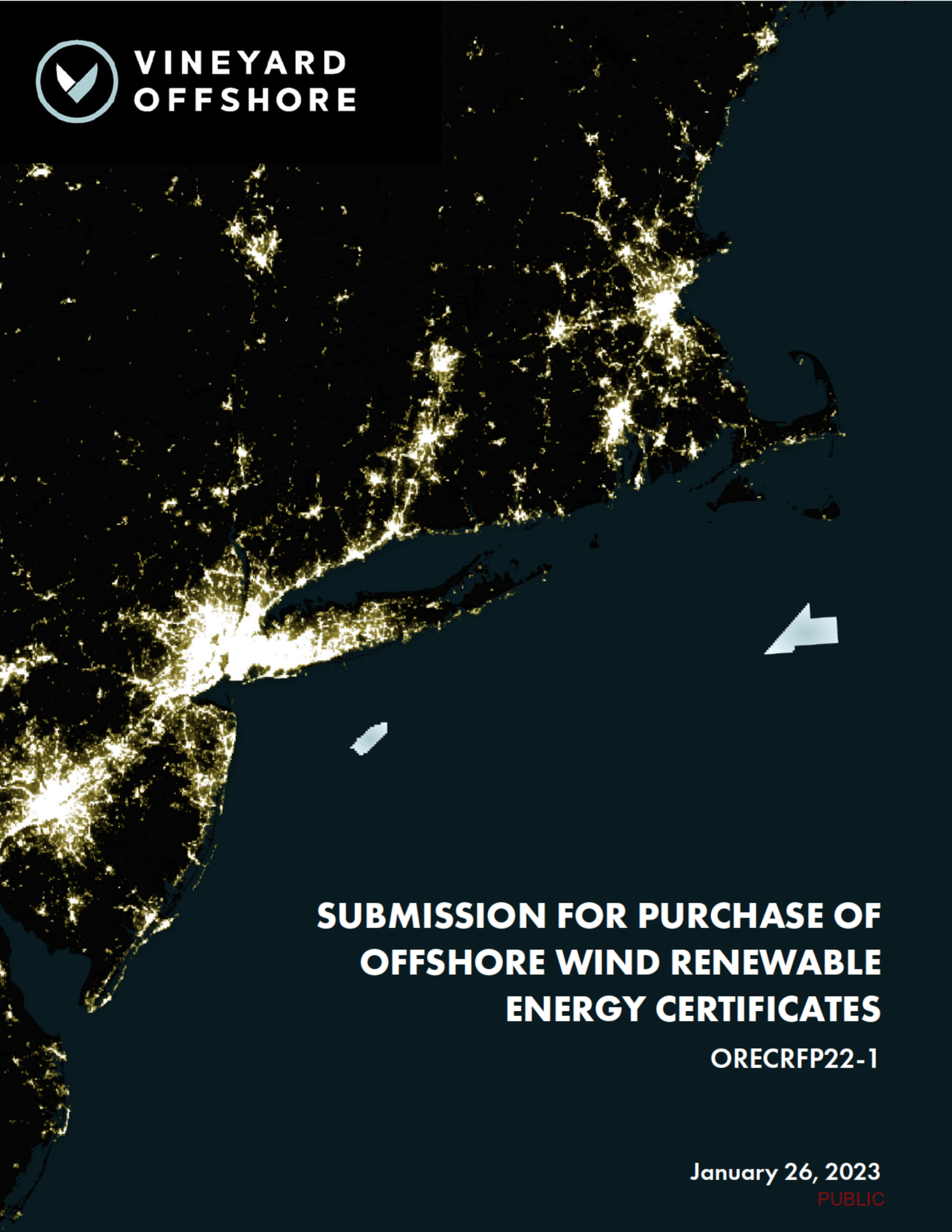




**VINEYARD
OFFSHORE**



**SUBMISSION FOR PURCHASE OF
OFFSHORE WIND RENEWABLE
ENERGY CERTIFICATES**

ORECRFP22-1

January 26, 2023

PUBLIC

4.12 Supply Chain Investment Plan - [REDACTED]

January 26, 2023

Submitted by



75 Arlington Street, 10th Floor
Boston, MA 02116

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PUBLIC

CONFIDENTIALITY STATEMENT

As contemplated under Sections 6.2.2 and 8.1 of the Request for Proposals ORECRFP22-1 issued July 27, 2022 and as further described in the Attachment 1–Statement and Request for Confidential Treatment included with Vineyard Offshore’s cover letter dated January 26, 2023 (the “Cover Letter”), certain information in this document or electronic file and the appendices listed below, each of which forms a part of this proposal, is non-public, confidential and proprietary information including commercial and financial information and trade secrets (as further defined in the Cover Letter, “Confidential Information”). Vineyard Offshore intends for all such Confidential Information to remain confidential and be treated as such by NYSERDA and the Scoring Committee. Under the New York Public Officers Law, Article 6, the New York State Freedom of Information Law and NYSERDA’s implementing regulations under 21 NYCRR Part 501, the Confidential Information contained in this proposal is not a public record and is exempt from public records requests. Confidential Information has been redacted from this Submission and/or is clearly marked “CONFIDENTIAL.”

Environmental Mitigation Plan for



Version 1.0

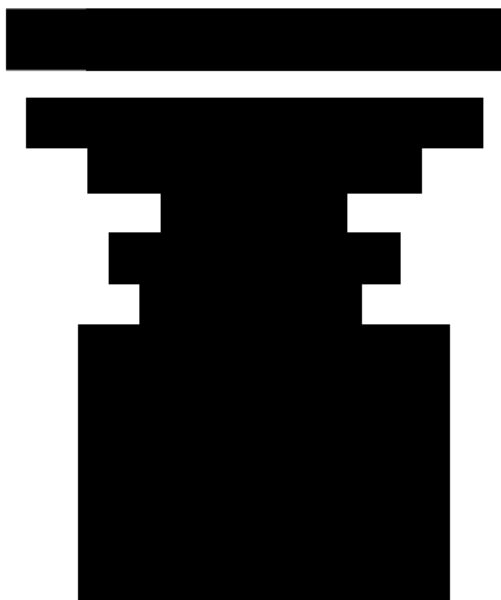
Prepared pursuant to [contract number, date (TBD)]

with

New York State Energy Research and Development Authority

Albany, NY

Prepared by



January 26, 2023

| Record of Revision | | |
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| Communication Officers, Contact Information, Links | | |
|----------------------------------------------------|-------------------------------------------------------------------------------------------------------------|---------------------|
| Name/Title | Role | Contact Information |
| | Oversees project development activities | |
| | Manages community engagement activities | |
| | Manages environmental activities | |
| | Directs media relations, crisis communications, branding, marketing, event planning, and government affairs | |
| | New York liaison for communities, businesses, organizations, civic leaders, and other stakeholders | |
| | Leads labor engagement efforts in New York and JSC-TWG representative | |
| | E-TWG representative | |

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Links to project information:

- There is currently no project-specific information available online.
- More information on [redacted] can be found here: [redacted]

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1 Environmental Mitigation Plan Summary

1.1 Overall philosophy and principles

- [REDACTED]
- [REDACTED] is committed to developing, constructing and operating well-sited facilities with minimal environmental impact. We are invested in working closely with numerous agencies and stakeholders to: (1) understand their concerns regarding the potential environmental effects of our Project, and (2) incorporate their feedback into the final design of our Project.

1.2 Overall approach to incorporating data and stakeholder feedback

- [REDACTED] will seek consultation and coordinate with relevant stakeholders.
- [REDACTED] will review existing research and data and seek input from stakeholders regarding data gaps to inform decisions made throughout the Project life cycle.
- [REDACTED] will review and seek input from stakeholders on proposed and conducted survey rationales and methodologies as well as design, construction and operation, and decommissioning plans for the Project.
- To the extent that the timeline allows, pre- and post-construction monitoring will be designed to improve the understanding of impacts of the Project on wildlife.
- [REDACTED] anticipates, subject to regulatory requirements, periodically assessing information gathered through pre-, during, and post-construction surveys and other means to determine if adjustments to avoidance, minimization, and mitigation measures are needed.
- [REDACTED] will update this EMP to accurately reflect the Project as it evolves.

1.3 Existing guidance and best practices that will be followed

- [REDACTED] anticipates consulting publications, tools, and plans for the Project, in particular those listed in Sections 5.1.1 and 6.1.1.
- Guidelines from regulators and regional monitoring organizations are continuously evolving and thus relevant references will be updated, as needed, during subsequent revisions to the EMP.

2 Communications and Collaboration Approach

2.1 Overview and communication plan objectives

- [REDACTED] will seek methods and processes to allow for a two-way flow of information between key stakeholders and the company, specifically highlighting how we will use this feedback to inform our decision making
- [REDACTED] will provide updates to environmental stakeholders in an appropriate manner that would be easily accessed and widely distributed
- In line with our Stakeholder Engagement Plan, [REDACTED] will also:
 - continue to actively identify, engage and communicate with a diverse and representative set of stakeholders throughout the life cycle of the Project;
 - foster, build, and maintain trusted relationships;
 - work to better understand and address concerns; and clearly communicate the reasons behind the decisions we make;
 - provide accurate, timely and relevant information in an accessible and well-understood format; and
 - update our communication plans and objectives to ensure regular and effective communication with a range of stakeholders and address stakeholder fatigue wherever possible.

2.2 Communication officers/positions, responsibilities, and contact information

| Name/Title | Role/Responsibilities | Contact Information |
|------------|-----------------------------------------|---------------------|
| [REDACTED] | Oversees project development activities | [REDACTED] |
| [REDACTED] | Manages community engagement activities | [REDACTED] |
| [REDACTED] | Manages environmental activities | [REDACTED] |

| | | |
|--|-------------------------------------------------------------------------------------------------------------|--|
| | | |
| | Directs media relations, crisis communications, branding, marketing, event planning, and government affairs | |
| | New York liaison for communities, businesses, organizations, civic leaders, and other stakeholders | |
| | Leads labor engagement efforts in New York and JSC-TWG representative | |
| | E-TWG representative | |

Table A – Communication Officers

2.3 Identification of stakeholders

- [REDACTED] will identify stakeholders relevant to environmental issues by, among other things:
 - community and stakeholder engagement activities and engaging in project partnerships;
 - expanding environmental engagement efforts prior to filing the Project’s federal and state permit applications;
 - consulting with relevant federal and state agencies; and
 - continuing to implement other stakeholder engagement methods outlined in [REDACTED]’s Stakeholder Engagement Plan.
- Stakeholder lists, contact details, and communications are tracked internally by [REDACTED] and classified by stakeholder group when and where appropriate.

2.4 Participation in stakeholder and technical working groups

2.4.1 Communication with E-TWG

- Though the E-TWG was set up to focus on offshore wind and wildlife issues in the northeastern US, [REDACTED] is receptive to coordinating with NYSERDA to identify appropriate opportunities to engage with the E-TWG if deemed necessary.

2.4.2 Communication with other New York State agencies

- [REDACTED] will engage with New York State agencies at reasonable times and intervals during the development of the Project to inform siting and design measures as well as permitting plans and timelines.
- [REDACTED] will continue to meet with the relevant New York State agencies at reasonable times and intervals, during the construction and operational phases of the Projects.
- [REDACTED] will endeavor to incorporate feedback from New York State agencies into Project design and potential mitigation and monitoring measures.

2.4.3 Communication with other stakeholder and working groups

- [REDACTED] will seek to collaborate with other regulatory agencies, academic and research institutions, environmental non-governmental organizations (eNGOs), and other stakeholder groups and consider memberships and participation in such collaborative efforts (e.g. E-TWG, F-TWG, ROSA, RWSE, etc.), where relevant to this Project.
- Host community and Disadvantaged Community outreach and communication efforts, such as hiring local staff and community representatives to conduct outreach, community meetings, and open houses, will ideally lead to the development of partnerships and initiatives that may help inform this EMP.

2.4.4 Communication and collaboration with other developers

- This section is not relevant to [REDACTED] s Project

2.5 Communication methods and tools by phase

- Recognizing that stakeholder groups have different needs when it comes to receiving information and participating in the project development process, [REDACTED] employs an array of methods to disseminate information and engage stakeholders. We will continually evaluate and adapt our approach to ensure the effectiveness of our efforts. The table below includes a subset of the communication methods and tools in our stakeholder engagement toolkit. Additional communication methods and tools are described in our Stakeholder Engagement Plan.

| Proposed Outreach Method/Tools | Phase* | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---|---|---|
| | 1 | 2 | 3 | 4 |
| ██████████ website | X | X | X | X |
| Social media, digital advertisements, newsletters, press releases, videos | X | X | X | X |
| Newspaper, radio, podcast, and/or television interviews | X | X | X | X |
| Virtual and in-person meetings and events, phone calls, e-mails | X | X | X | X |
| Project partnerships, attending/sponsoring/tabling at conferences and events, formal and informal coalition building, site visits, focus groups, informal networking | X | X | X | X |
| <i>*Phase: 1: Survey/Design; 2: Construction; 3: Operation; 4: Decommission</i> | | | | |

Table B – Proposed Outreach Method/Tools

3 Supporting Other Research

3.1 Support of collaborative research

- Where it is appropriate to do so, [REDACTED] is willing to share ecological data collected as part of the development of the Project.

3.2 Handing/processing requests

- Where it is appropriate to do so, [REDACTED] is willing to share ecological data collected as part of the development of the Project

3.3 Data availability

- [REDACTED] will coordinate with NYSERDA to determine if there are opportunities to share Site and Environmental Data to the extent it will not be made public as part of the permitting process.

3.4 Proposed restrictions

- As necessary, [REDACTED] will seek to explain why identified data types are considered commercially sensitive.
- In certain instances, [REDACTED] may impose restrictions on data provision to protect proprietary and/or commercially sensitive information, maintain site security, ensure safety, etc.
- [REDACTED] notes that some data, while not proprietary, may be time consuming or costly to reproduce depending on the specific request and the primary format it was collected in.

3.5 Financial commitment for third party research

- This Section does not apply to [REDACTED]'s Project.

3.6 Proposed or existing commitments/collaborations

- This Section does not apply to [REDACTED]'s Project

4 Proposed Mitigation of Impacts to Marine Mammals and Sea Turtles

- This Chapter does not apply to [REDACTED]'s Project

5 Proposed Mitigation of Impacts to Birds and Bats

5.1 Baseline characterization

5.1.1 Available information

Key data sources include, but are not limited to:

- USFWS Information for Planning and Consultation (IPaC) Online Tool
- NYNHP Databases
- NYSDEC Geospatial Data Sets
- USFWS Indiana Bat (*Myotis sodalis*) Draft Recovery Plan: First Revision
- USFWS Species Status Assessment Report for the Northern long-eared bat (*Myotis septentrionalis*)
- NYNHP Ecological Communities of New York State Second Edition
- North American Breeding Bird Survey Summary of Analysis Website 1966-2019
- USFWS Atlantic Flyway Breeding Waterfowl Survey

5.1.2 Data collected

- Data collected will support effects determinations to assess the potential presence or disturbance to any known protected species and their suitable habitats.

5.2 Species at risk

- The Project may be in the range of the federally endangered Indiana bat and northern-long eared bat.
- The Project is situated within a major migratory bird flyway known as the Atlantic Flyway.
- [REDACTED] is aware of the potential occurrence of these species and will go through the necessary approval and consultation processes in compliance with the Endangered Species Act of 1973, Migratory Birds Treaty Act, and Bald and Golden Eagle Protection Act.
- However, the Site is an existing industrialized parcel, and therefore no tree or shrub removal is anticipated. As such, overall risks of impacting protected bats or birds is expected to be negligible.

5.3 Potential impacts/risks and mitigation measures by project stage

| Potential Impacts | Proposed Mitigation Measures ¹ | Phase* | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---|---|---|
| | | 1 | 2 | 3 | 4 |
| Collision risk to marine birds and bats | <ul style="list-style-type: none"> Not Applicable | | | | |
| Habitat impacts, including breeding and nesting areas | <ul style="list-style-type: none"> Siting and construction of Project components will be conducted in such a way as to avoid or minimize the loss or alteration of bird and bat habitat, as well as avoid or minimize disturbance and direct and indirect effects to bird and bat populations and their prey. Specifically, onshore infrastructure and development activities will 1) maximize the use of previously developed or disturbed areas, and 2) avoid unique or protected habitats, as well as habitat for key species, where feasible. During the permitting process, [REDACTED] will consult with agencies to develop appropriate time of year restrictions for tree clearing, if needed, to avoid or minimize impacts to bats. [REDACTED] will adhere to the new conservation strategies for northern long-eared bats, in consultation with federal and state regulators. | X | X | X | X |
| <p><i>*Phase: 1: Survey/Design; 2: Construction; 3: Operation; 4: Decommission</i></p> <p><i>The proposed measures described in this table are preliminary in nature and subject to review and approval from jurisdictional agencies in accordance with regulatory and permitting requirements. Final mitigation measures will be determined pursuant to applicable permitting processes and may vary from the list provided herein.</i></p> | | | | | |

Table C – Potential Impacts and Proposed Mitigation Measures – Birds & Bats

5.4 Monitor for impacts during each phase

- [REDACTED] will implement appropriate monitoring measures to assess potential impacts to birds and bats from the Project.
- Monitoring approaches during any Project phase will take into account the limitations of the monitoring techniques (e.g., ability to identify species, monitor at night and during inclement weather, etc.), and other factors when designing a methodology.

5.4.1 Pre/Post monitoring to assess and quantify changes

- Pre- and post-construction monitoring will be designed in such a way that it improves understanding of the impacts of development on birds and bats, including identifying specific questions and taxa on which to focus monitoring efforts for the proposed project.
- Monitoring will, to the extent practicable, use appropriate study designs and methodologies to effectively analyze risk prior to construction and evaluate impacts during construction and operation by testing hypotheses and helping to assure statistical power for meaningful data analysis.
- Outside expertise will, if practicable and necessary, be consulted during study design and data analysis processes.

5.4.2 Address data gaps

- [REDACTED] will work with stakeholders, including regulatory agencies and local groups, in the design phase of the Project to identify data gaps to be addressed through surveys or permitting applications.

5.5 Strategies for developing alternate protocols

- As necessary, [REDACTED] will explore this topic further in consultation with the regulatory agencies, and relevant stakeholders.

6 Proposed Mitigation of Impacts to Fish, Invertebrates and their Habitats

6.1 Baseline characterization

6.1.1 Available information

Key data sources include, but are not limited to:

- USFWS IPaC Online Tool
- NYSDEC Geospatial Data Sets
- National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS) Essential Fish Habitat Mapper
- NOAA NMFS Greater Atlantic Region Endangered Species (ESA) Section 7 Mapper
- NYSDEC Long-Term Hudson River Fish Surveys
- The Atlantic Cooperative Telemetry Network Database

6.1.2 Data being collected

- Data collected will support effects determinations to assess the potential presence or disturbance to any known protected species and their suitable habitats.

6.2 Species at risk

- Atlantic and shortnose sturgeon are known to inhabit the [REDACTED]
- [REDACTED] is designated as Essential Fish Habitat (EFH) with presence of known submerged aquatic vegetation (SAV) beds in the vicinity of the Project.
- [REDACTED] is aware of the potential occurrence of these species and will go through the necessary approval and consultation processes in compliance with Endangered Species Act of 1973 and Magnuson-Stevens Fishery Conservation and Management Act.
- However, with the implementation of conservation measures, impacts to finfish and their habitats are expected to be limited.

6.3 Potential impacts/risks and mitigation measures by project stage

| Potential Impacts | Proposed Mitigation Measures ¹ | Phase* | | | |
|--------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---|---|---|
| | | 1 | 2 | 3 | 4 |
| Micro-siting conflicts with habitats and fishery resources | <ul style="list-style-type: none"> • [REDACTED] will seek input from regulatory authorities, and stakeholders to locate Project components in the least impactful manner that is practicable. | X | | | |
| Temporary alteration of the riverbed and localized increases | <ul style="list-style-type: none"> • [REDACTED] will seek to use noise attenuation technologies to reduce sound from pile driving of foundations (if such methods are used). | X | X | X | X |

| | | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|---|---|---|---|
| in noise and turbidity | | | | | |
| Long-term changes to riverbed and habitat | <ul style="list-style-type: none"> █ will, to the extent possible, avoid sensitive benthic habitats. | X | X | X | X |
| EMF Impacts | <ul style="list-style-type: none"> Not Applicable | | | | |
| Cable burial | <ul style="list-style-type: none"> Not Applicable | | | | |
| Turbine Scour Protection | <ul style="list-style-type: none"> Not Applicable | | | | |
| <p><i>*Phase: 1: Survey/Design; 2: Construction; 3: Operation; 4: Decommission</i></p> <p><i>The proposed measures described in this table are preliminary in nature and subject to review and approval from jurisdictional agencies in accordance with regulatory and permitting requirements. Final mitigation measures will be determined pursuant to applicable permitting processes and may vary from the list provided herein.</i></p> | | | | | |

Table D – Potential Impacts and Proposed Mitigation Measures – Fish, Invertebrates and their Habitats

6.4 Monitor for impacts during each phase

6.4.1 Pre/Post monitoring to assess and quantify changes

- Monitoring will, to the extent practicable, use appropriate study designs and methodologies to effectively analyze risk prior to construction and evaluate impacts during construction and operation by testing hypotheses and helping to assure statistical power for meaningful data analysis.
- Outside expertise will, if practicable and necessary, be consulted during study design and data analysis processes.
- [REDACTED] will seek to collaborate with other regulatory agencies and stakeholder groups to identify research needs and opportunities.

6.4.2 Addressing data gaps

- [REDACTED] will work with agencies and stakeholders to identify data gaps that may be addressed through surveys or permitting applications.

6.5 Strategies for developing alternate protocols

- As necessary, [REDACTED] will explore this further in consultation with the regulatory agencies and relevant stakeholders.

7 Considerations for Subsea and Overland Cables

- This section is not applicable to this Project.

8 Additional Considerations

8.1 Additional mitigation strategies and EMP refinement

- [REDACTED] will support collaborative research on potential mitigation strategies and best management practices, with other developers, agencies, and stakeholders to the extent it is relevant to this Project.

8.2 Process for updating the EMP

- [REDACTED] will continuously evaluate and evolve this EMP so that all the components of the EMP are complete and sufficient.
- [REDACTED] expects that additional guidance and information will become available throughout the planning and regulatory process and as such will continue to consider its relevance to the EMP at the appropriate intervals.
- Updates to the EMP are intended to reflect the results of iterative exchanges with relevant stakeholders.
- [REDACTED] will update the EMP in a timely manner that reflects changes made based on key regulatory project deliverable dates, and present that information to the E-TWG and NYSERDA, as may be required

9 Project Decommissioning

- While there is no plan to decommission the facility, should unforeseen circumstances arise, [REDACTED] would follow the good practice measures outlined below.

9.1 Potential impacts on marine wildlife, birds, bats, and fisheries

- [REDACTED]'s waste handling processes during decommissioning will focus on re-use or recycling, with disposal as the last option.
- [REDACTED] will collaborate with regulatory authorities and key environmental stakeholder groups to better understand the effects and potential impacts associated with decommissioning.

9.2 Approach for decommissioning plan and coordination with stakeholders

- [REDACTED] will decommission the Project in accordance with all necessary laws and regulations and generate a detailed Project-specific decommissioning plan.
- [REDACTED] will seek input on the detailed Project-specific Decommissioning plan from regulatory agencies, fisheries and marine stakeholders, and local communities.
- [REDACTED] will use "lessons learned" from the construction and operations activities and apply them when appropriate to the decommissioning plan.