



Appendix I : Environmental Mitigation Plan

for

Vestas NY Blades Facility

Version 1.0

Prepared pursuant to NYSERDA OREC RFP 22-1

with

New York State Energy Research and Development Authority

Albany, NY

Prepared by

Vestas Blades America, Inc and Affiliates

1417 NW Everett St, Portland, OR 97209

The logo for Vestas, featuring the word "Vestas" in a bold, blue, italicized sans-serif font, followed by a registered trademark symbol (®).

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Communication Officers, Contact Information, Links		
Name/Title	Role	Contact Information
Michelle Bardini, Marketing & Communications Specialist	Marketing & Communications Lead for Offshore Wind	MHLBR@Vestas.com +1 (503) 260-6754

Links to Project Information: NA at this time

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1. Environmental Mitigation Plan Summary

1.1 Overall philosophy and principles

“Leading a responsible and inclusive energy transition” is the social mission for Vestas no matter where we are present in the world. As the reach and scale of renewable energy increases, so does the urgency to ensure this scale is supported by sustainable social practices.

Vestas incorporates Sustainability in Everything We Do as part of our Sustainability Strategy. Our four key sustainability goals are to (1) achieve **carbon neutrality** by 2030 without carbon offsets; (2) produce **zero-waste** turbines by 2040; (3) become the **safest, most inclusive, and socially responsible** company in the energy industry; and (4) **lead** the transition towards a world powered by sustainable energy.

Vestas is the first energy manufacturer of renewable energy that commits to climate targets in line with the Paris Agreement through SBTi validation. **We commit to reduce scope 1 and 2 GHG emissions 100% by 2030** from a 2019 base year of measurement and **scope 3 GHG emissions 45% per MWh delivered to the market by 2030** from a 2019 base year.

Vestas’ principles related to sustainability are further outlined in Section C.2.C.6 of the NY Blades SCIP Proposal; these principles and commitments drive internal decision making in alignment with the responsible management of our environmental resources. Vestas recognizes that the development of the manufacturing Facility will have implications for the surrounding environment; while many of these impacts cannot be avoided altogether, Vestas will employ a cohesive vision toward environmental mitigation that seeks to avoid, mitigate, restore, or offset any impacts.

Within the Stakeholder Engagement Plan (Appendix II), Vestas outlines key principles that Vestas will follow to lead and facilitate the social dialogue between the Facility, Vestas’ Customers, the Communities, Policymakers, and other identified stakeholders:

- **Pursue a holistic approach** that integrates stakeholder engagement into all aspects of the facilities planning, development, and operations
- **Conduct bespoke, targeted outreach** that responds to and meets the specific needs of the communities around the Facility
- **Practice a proactive approach** that uncovers hidden challenges and engages difficult-to-reach groups and individuals
- **Emphasize partnership and authentic collaboration** with and across a wide range of community members and relevant organizations
- **Build on and join existing partnerships and programs** where possible, to maximize community-wide impact and minimize duplicative or competitive initiatives
- **Maximize opportunities for all members of the community** in ways that ensure equitable outcomes, especially for marginalized communities

Stakeholder engagement and feedback is critical for further development and execution of the

Environmental Mitigation Plan; Vestas expects to further refine this plan throughout the permitting process and in concert with our customers who will integrate our perspective and ideas into their own expertise and local plans supporting offshore wind projects in NY.

1.2 Overall approach to incorporating data and stakeholder feedback

Data Incorporation:

Data is critical to a successful Environmental Mitigation Plan (EMP); Vestas will acquire and use data to inform a coordinated and sophisticated plan. Vestas has already collected significant data on the proposed site for Facility development, and will collect data through the following studies as well as through the permitting process:

- Ecological Assessment and Wetland Delineation
- Phase I Environmental Site Assessment
- Archaeological Phase 1A and 1B Assessment
- Geotechnical Investigation
- Noise study
- Visual impact study
- Air Emission Analysis
- Traffic Impact Study
- Facility Energy Model
- Stormwater Management Plan
- Hazardous Materials Management Plan
- Specific monitoring or instrumentation related to wildlife is not expected at this time

Stakeholder Feedback:

As part of the New York State Environmental Quality Review (SEQR) Vestas will solicit formal stakeholder feedback at several touchpoints, from making an action classification, establishing the lead agency, and identifying involved agencies. In addition to the involved agencies, the public will be involved in the lead agency's determination of significance and the scoping of the Environmental Impact Statement (EIS) scope. A potential public hearing is possible after the acceptance of the draft EIS as well. There will be ample opportunity for both involved agencies and the public to make their concerns known.

In addition to the avenues outlined above for public participation in the permitting process, Vestas has proposed a Stakeholder Engagement Plan (Appendix II) which identifies 11 categories of stakeholder groups with at least 30 organizations slated for ongoing outreach and engagement. Identified stakeholders of particular focus for the EMP include Environmental Organizations, Environmental Justice Organizations, First Nations, as well as key permitting stakeholders. Vestas plans to engage these stakeholders amongst the full list as outlined in the Stakeholder Engagement Plan through outreach activities which could include:

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	<ul style="list-style-type: none"> ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] 	<ul style="list-style-type: none"> ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED]
[REDACTED]	<ul style="list-style-type: none"> ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] 	<ul style="list-style-type: none"> ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED]
[REDACTED]	<ul style="list-style-type: none"> ■ [REDACTED] 	<ul style="list-style-type: none"> ■ [REDACTED] ■ [REDACTED] ■ [REDACTED]

Table 1: Excerpt of Initial Stakeholders Identified for Engagement

1.3 Existing guidance and best practices that will be followed

Vestas is aware of many guidance documents, publications, tools, and past projects that will inform our strategy for Facility design, issue avoidance, environmental mitigation or offset, and data gathering.

Vestas will rely on environmental experts to support the development of the Facility and expects them to follow industry best practices as well as regionally relevant guidance documents. Some of them include but are not limited to:

- USFWS – Classification of Wetlands and Deepwater Habitats of the United States
- USFWS – National Wetlands Inventory
- New York Natural Heritage Program – Ecological Communities of New York State
- New York Natural Heritage Program – Online Conservation Guide USACE – Corps of Engineers Wetlands Delineation Manual
- New York State Department of Environmental Conservation – Environmental Resource Mapper
- Department of Environmental Conservation – Endangered and Threatened Fishes of New York
- National Marine Fisheries Service Recommendations for Mapping Fish Habitat

Vestas is committed to respecting human rights by enhancing positive impacts in local communities, as an integral part of how we do business. To operationalize our commitment, Vestas uses the concept “Social License to Operate” (SLO). Building on this concept, Vestas has developed its own social framework (Attachment 5), informed by good international industry practice, to create the social license to operate connected to the construction and operation of wind parks.”

At Vestas, we act with integrity in everything we do. This means making the right decisions when faced with difficult situations and ensuring that our actions match our values of Accountability, Collaboration, Simplicity and Passion.

2. **Communications and Collaboration Approach**

2.1. **Overview and communication plan objectives**

Vestas anticipates that, for Facility development, stakeholder feedback and communication pertaining to the EMP will primarily occur within the NY SEQR permitting process. In addition, Vestas will pursue an extensive set of engagement activities and communications as outlined in the preceding section and further described in the Stakeholder Engagement Plan (Appendix II). Vestas expects to work closely with its customers to collaborate on communication objectives and stakeholder engagement on the ground.

2.2. **Communication officers/positions, responsibilities, and contact information**

Name/Title	Role/Responsibilities	Contact Information
Michelle Bardini, Marketing & Communications Specialist	Marketing & Communications Lead for Offshore Wind	MHLBR@Vestas.com +1 (503) 260-6754

Table 2: Communication Officers/positions, Responsibilities, and Contact Information

Additional positions will be included following NYSERDA’s award for ORECRFP22-1.

2.3. **Identification of stakeholders**

As previously mentioned in Section 1.2 and further described in the Stakeholder Engagement Plan (Appendix II), Vestas has conducted outreach to more than 15 entities to gain an initial understanding of the critical issues of local communities or relevant interest groups to inform the Stakeholder Engagement Plan. This initial outreach garnered an early working list of 30 organizations slated for ongoing outreach. Vestas’ expectation is that many other organizations will surface as Vestas continues its stakeholder engagement strategy and works closely with customers and existing stakeholder connections. In addition, Vestas intends to rely on lead agencies during the SEQR process to identify and include interested parties.

2.4. **Participation in stakeholder and technical working groups**

2.4.1. **Communication with E-TWG**

Vestas supports the work of the E-TWG and stands ready to work with the group in any way that seems valuable.

2.4.2. Communication with other New York State agencies

Primary communication will occur in accordance with State designated processes such as SEQR and is anticipated to focus on the permitting lead agencies for clarity of communication. Advance communication with State agencies and Town stakeholders has already occurred and serves as a model for Vestas strategy; early and often communication is a key driver for avoiding conflict in the future and designing the best project that most aptly satisfies all parties. Lead agency determinations have not been formalized, but initial discussions have occurred with relevant parties. Vestas will continuously monitor the need for additional communication to ensure all agencies are informed and included as necessary.

2.4.3. Communication with other stakeholder and working groups

Vestas' plans for communication with other stakeholders and working groups is described in the Stakeholder Engagement Plan, and Vestas expects the initial list of organizations identified to expand as we continue this work. We are eager to work with representatives in New York to identify the most valuable venues in which Vestas could contribute expertise via working groups.

2.4.4. Communication and collaboration with other developers

Not applicable for proposed SCIP Facility.

2.5. Communication methods and tools by phase

Please see the Stakeholder Engagement Plan (Appendix II). Further refinement of this section is expected in collaboration with Vestas' customers.

3. Supporting Other Research

3.1. Support of collaborative research

Given that the Facility development is expected to follow established environmental mitigation procedures and methods, limited contribution to environmental research is expected. If the need arises, Vestas will be eager to collaborate with leading experts in the environmental community.

3.2. Handing/processing requests

In as much as the sharing of Project data does not violate previous business critical or 3rd party confidentiality requirements, Vestas expects to support all scientific efforts with available data.

3.3. Data availability

A Data Management and Availability Plan will be developed upon award. Vast amounts of environmental data are not expected during the development of the Facility, but all data that is collected will be shared.

3.4. Proposed restrictions

Environmental data related to the Facility development is not expected to be commercially sensitive.

3.5. Financial commitment for third party research

Vestas will coordinate closely with offshore wind developers to understand the expected manufacturer contributions required to support the developer's assessment of environmental research funding that should be allotted to further research. No direct investment from Vestas is expected.

3.6. Proposed or existing commitments/collaborations

Vestas will pursue a number of partnerships in the region upon award to maximize the economic and social contributions possible from a project of this scale. Relationships specifically related to environmental impacts and monitoring have not been formalized at this time.

4. Proposed Mitigation of Impacts to Marine Mammals and Sea Turtles

Neither marine mammals nor sea turtles are not expected to be impacted by the Facility development. This assertion will be validated during the course of a full environmental review conducted via the permitting process post-award.

5. Proposed Mitigation of Impacts to Birds and Bats

5.1. Baseline characterization

Vestas has engaged an environmental consultant to conduct a preliminary review of bird and bat habitats. Their expertise, in addition to resources from the National Heritage Office (NHO) and the US Fish and Wildlife Service (USFWS) helped to identify information related to endangered, threatened, or rare species including birds and bats. In addition, the New York DEC website was reviewed to determine the potential for significant natural communities near the site. Furthermore, an onsite field review was conducted to identify key species within the project area.

5.1.1. Available information

See above.

5.1.2. Data collected

Prior to development, a site assessment will again be conducted to investigate the presence of bald eagle or bat habitat such that those species can be managed during the construction period.

5.2. Species at risk

Initial studies have identified potential bald eagle and long-eared bat habitat in close proximity to the site, so those species will receive the most focused attention. Vestas will employ a cohesive vision toward environmental mitigation that seeks to avoid, mitigate, restore, or offset any impacts.

5.3. Potential impacts/risks and mitigation measures by project stage

There is still a significant body of work that must be performed to better understand and formalize what form mitigation and avoidance should take. We intend to rely on environmental expertise familiar with the region to ensure a comprehensive plan. When additional information necessitates an update to the EMP, relevant stakeholders and agencies will be informed as part of our regular communication expected throughout the process.

5.4. Monitor for impacts during each phase

The primary impact anticipated will be the selective removal of trees along the shoreline near the dock area as required for facility blade loading operations. When these removals are necessary, a pre-investigation will be conducted to verify the presence of key species and ensure their proper management prior to, during, and after construction.

5.4.1. Pre/Post monitoring to assess and quantify changes

Assessing and quantifying changes in bird and bat resources will be conducted in accordance with environmental best practice. Total impacts are expected to be low for the facility development. A more comprehensive plan for assessing and quantifying changes in bird and bat resources will be developed as Vestas gains further information via studies conducted through the permitting process.

5.4.2. Address data gaps

Vestas stands ready to collaborate with all interested parties if any data gaps arise.

5.5. Strategies for developing alternate protocols

No additional comments.

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

6.1. Baseline characterization

Vestas has engaged an environmental consultant to conduct a preliminary review of fish and invertebrate habitats. Their expertise, in addition to resources from the National Heritage Office (NHO) and the US Fish and Wildlife Service (USFWS) helped to identify information related to endangered, threatened, or rare species. In addition, the New York DEC website was reviewed to determine the potential for significant natural communities near the site.

6.1.1. Available information

See above

6.1.2. Data being collected

A more thorough field investigation is anticipated post-award to verify the extent to which the concerned species are present in the project site.

6.2. Species at risk

Shortnose Sturgeon and Atlantic Sturgeon are anticipated to have potential to be in the proximity of the site.

6.3. Potential impacts/risks and mitigation measures by project stage

The primary potential impacts affecting sturgeon habitat during the project will be any maintenance dredging needed as well as the construction of the modified dock. Maintenance dredging (if required) will be done according to the existing NYDEC and USACE permits in approved work windows. However, no dredging is expected at this time.

Construction of the dock modifications will likely require installation of pile foundations between the existing line of dolphins and the shoreline. Vibratory installation of the piles will be pursued instead of driven pile installation to minimize impacts. Further, Vestas anticipates seasonal work window restrictions so the work will be planned to be executed during the approved windows.

There is still a significant body of work that must be performed to better understand and formalize what form mitigation and avoidance should take. We intend to rely on environmental expertise familiar with the region to ensure a comprehensive plan. When additional information necessitates an update to the EMP, relevant stakeholders and agencies will be informed as part of our regular communication expected throughout the process.

6.4. Monitor for impacts during each phase

6.4.1. Pre/Post monitoring to assess and quantify changes.

Vestas will follow environmental best practice in monitoring and assessment of habitat changes.

6.4.2. Addressing data gaps

Vestas stands ready to collaborate with all interested parties if any data gaps arise.

6.5. Strategies for developing alternate protocols

No additional comments.

7. Considerations for Subsea and Overland Cables

7.1. Mitigation strategies for subsea and overland cables

N/A

8. Additional Considerations

8.1. Additional mitigation strategies and EMP refinement

Vestas will seek to avoid, mitigate, restore, or offset any environmental impacts of the proposed Facility. There is still a significant body of work that must be performed to better understand and formalize what form mitigation and avoidance should take. We intend to rely on environmental expertise familiar with the region to ensure a comprehensive plan. When additional information necessitates an update to the EMP, relevant stakeholders and agencies will be informed as part of our regular communication expected throughout the process.

8.2. Process for updating the EMP

No additional comments.

9. Project Decommissioning

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

Decommissioning of the facility is not contemplated at this time, but if it does occur environmental mitigation planning will be executed according to best practice and existing regulation.

9.2 Approach for decommissioning plan and coordination with stakeholders

No additional comments.