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Big Reuse • Blue-Green Alliance • Building and Construction Trades Council of Nassau and Suffolk
Counties • Campaign for Renewable Energy • Citizens' Campaign for the Environment
Citizens for Local Power • Dryden Resource Awareness Coalition • Environmental Advocates of
New York • Environmental Justice Task Force of the Western NY Peace Center • Food & Water
Watch • Fossil Free Tompkins • Gotham Whale • Greater New York Labor-Religion Coalition
GreenFaith • House of the Lord Church • Hudson River Sloop Clearwater • Indian Point Safe
Energy Coalition • International Brotherhood of Electrical Workers, 3rd District • Ironworkers
Local 361 Jewish Climate Action Network NYC • Labor-Religion Coalition of NYS • Long Island
Federation of Labor (AFL-CIO) • Long Island Progressive Coalition • National Wildlife Federation •
Natural Resources Defense Council • New Paltz Climate Action Coalition • New York City
Environmental Justice Alliance • New York Interfaith Power & Light • New York Public Interest
Research Group New York Working Families • New Yorkers for Clean Power • North American
Climate, Conservation and Environment • North Country 350 Alliance • Nuclear Age Peace
Foundation Nuclear Information and Resource Service • Occupy Bergen County • Renewable
Energy Long Island • Riverkeeper • Sane Energy Project • Save the Pine Bush • Seatuck
Environmental Association • Sierra Club • Surfrider Foundation, NYC Chapter • United for Action
Upper Green Side • WNY Drilling Defense • Workforce Development Institute**

August 10, 2018

Alicia Barton, President & CEO
New York State Energy Research and Development Authority
17 Columbia Circle
Albany, NY 12203-6399

RE: RFI OSW-2018 Comments – Large Scale Renewables Team

Dear Ms. Barton,

On behalf of the undersigned 52 environmental, environmental justice, labor and other not-for-profit organizations – representing hundreds of thousands of New Yorkers – we applaud your commitment to developing 2,400 megawatts of offshore wind power as a key strategy for building a clean energy future for New York. We are united in our support for responsible offshore wind power development that maximizes the many local environmental and economic benefits this massive new clean energy source can deliver, and welcome this opportunity to provide the New York State Energy and Research Development Authority (NYSERDA) with input regarding key principles for accomplishing this goal.

We appreciate the significant efforts your Administration has made to date to advance offshore wind power – including developing a comprehensive Offshore Wind Master Plan for New York that provides a roadmap for scaling up this transformational clean energy opportunity. With significant offshore wind actions moving forward across the region, including a total of 1,400 MW committed by New England states and a national

precedent-setting 3,500 MW offshore wind requirement signed into law in New Jersey (with an 1,100 MW procurement expected this year), it is a critical moment for New York to confirm and clarify its near and long term development plans for the offshore wind industry. Such market visibility will spark early opportunities for investments in New York's ports, infrastructure, and manufacturing sectors – ensuring we maximize the local economic benefits of launching this new clean energy industry.

We applaud the recent order by the Public Service Commission directing NYSERDA to move forward with a solicitation of approximately 800 MW of offshore wind power this year, as a key step in meeting the Governor's offshore wind goal. As NYSERDA works to finalize the process for procuring offshore wind power, we urge the State to adopt a responsible contracting policy that can ensure that every megawatt built to power New York is developed in a manner that protects our valuable marine and coastal resources and maximizes job creation and other economic benefits for the state. Key components of such a policy should address: environmental protection; high-quality employment and work product; and community benefits.

- **Environmental Protection:** To help ensure that all projects built to meet New York's offshore wind goal are developed responsibly with strong protections in place for coastal and marine wildlife, we urge NYSERDA to include consideration of environmental impacts and benefits in the eligibility requirements for all bidders. NYSERDA, in consultation with the Department of Environmental Conservation, is actively developing science-based Best Management Practices (BMP) for offshore wind development through its Environmental Technical Working Group as described in New York's Offshore Wind Master Plan. We support this process and believe that requiring all bidders to submit an Environmental Mitigation Plan detailing their commitments to minimize environmental impacts, including compliance with any final BMPs, as a project eligibility threshold will help ensure that the state is only choosing among projects that have a high likelihood of success in the many permitting processes ahead. Establishing such a process would create a national model for state leadership in advancing responsible offshore wind development, and should be applied starting in Phase 1 and continuing forward for all projects built for New York. In order to meet the state's climate and clean energy goals, NYSERDA should also encourage projects that offset polluting energy infrastructure in addition to meeting increasing demand.
- **High-Quality Employment and Work Product:** To help ensure timely, cost-effective completion of high-quality projects built to meet NY's offshore wind goal, we urge the Commission to include a high-quality employment and work product eligibility requirement for all bidders. In March 2018, New York State announced that all large-scale renewable energy projects are required to pay prevailing wage – an important precedent for the offshore wind industry. In addition to paying prevailing wage for construction and building service work, eligible bidders should also be required to participate in Project Labor Agreements (PLA) and joint labor-management training programs. PLAs are particularly important because they bring coordinated, pro-active planning to complex projects, provide important benefits to local communities in terms of skills training, employment opportunities and future workforce development, and ensure that the most productive and skilled craft labor is available to work on a project. We believe including high-quality employment requirements, particularly for a PLA, will make New York a national leader in developing a successful, robust and equitable offshore wind industry.
- **Community Benefits:** The development of offshore wind in New York can provide important and much-needed support to local communities throughout the state. Community benefits agreements, designed in coordination with organized labor and local community organizations, help ensure that a project's contribution to local communities is maximized and that local communities are supportive of

the project. Participation in a community benefit agreement and other commitments such as local hiring, purchasing from the local supply chain, and investments in ports must be required and valued in the contract evaluation process. Ideal community benefit agreements ensure that projects support additional resiliency measures, mitigate energy burden, encourage local supply-chain development, and prioritize underserved markets. New York's offshore wind projects will be most successful when clear commitments to maximize opportunities for our local workforce and port resources are included in development plans from the beginning.

We stand ready to support your efforts to advance responsibly developed offshore wind power. It is a critical moment in America's offshore wind story, and New York has an opportunity to lead the nation in demonstrating that projects can be built with strong standards in place that benefit our local environment, workforce and communities. We thank you for your consideration and look forward to working together in the critical months and years ahead.

Sincerely,

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