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10/14/2022

Secretary of the Board
44 South Clinton Ave., 1st Floor
PO Box 350
Trenton, NJ 0865-0350

Waterfront Alliance Comments

Dear Secretary Camacho,

In the matter of the opening of New Jersey's Third Solicitation for Offshore Wind Renewable Energy Certificates (OREC), Docket No. QO22080481, Waterfront Alliance submits the following responses to the New Jersey Board of Public Utilities' (NJBPU) request for information.

The Waterfront Alliance inspires and effects resilient, revitalized, and accessible coastlines for all communities. Since 2007, the Waterfront Alliance has grown into a coalition of more than 1,100 organizations working together to bring about real change to the New York-New Jersey Harbor region's waterways and more than 700 miles of shoreline.

We submit our answers to the RFI below following background information on a national standard for waterfront development which applies to the offshore wind industry, and we believe should be included as part of New Jersey's development of offshore wind.

Background on WEDG® (Waterfront Edge Design Guidelines)

Waterfront Alliance created and leads the WEDG® (Waterfront Edge Design Guidelines) program which is a voluntary rating system encouraging public and private sector waterfront developments to increase resilience, improve ecology, and commit to community responsiveness beyond standard building codes and practices. Projects that achieve WEDG Verification are the gold standard for development where water meets land.

WEDG applies to varying land-uses, including industrial and working waterfront facilities and a variety of offshore wind sites including (but not limited to) staging ports, onshore cable interconnection facilities, operations and maintenance ports, and waterfront manufacturing facilities. The only true limitation on the applicability of WEDG to sites is scale; projects with less than 50 linear feet of waterfront may find it difficult to achieve WEDG Verification. In any project requirements around the use of WEDG on sites, these small sites should be exempted.



WEDG was awarded the American Planning Association's Gold National Planning Achievement Award for a Best Practice in 2019. It was developed by a multidisciplinary team of 150 technical experts that spanned regulatory experts, engineers, architects, environmental professionals, community advocates, industry representatives, and municipal and state officials. Together, they developed a rigorous set of standards that promote resilience, access, and ecology in a way that is practical and feasible on waterfronts across the country. Today, the Technical Advisory Committee for WEDG includes multiple New Jersey residents, including a representative from the New Jersey Department of Environmental Protection.

Similar to Leadership in Energy and Environmental Design (LEED) or Envision certifications, WEDG Verification is awarded only for projects that successfully pass a rigorous and thorough technical review of the project's design against the publicly available design standards. Each project is assessed by engineers, landscape architects, and other independent specialized technical professionals, coordinated by Waterfront Alliance.

A major offshore wind staging facility in New York has committed to WEDG Verification and the NYC Economic Development Corporation's RFP for the Rossville Municipal Site (a proposed turbine manufacturing site) includes a preference for adherence to the WEDG standards. Additionally, Waterfront Alliance is working closely with developers in New York and New Jersey to apply WEDG design principles to multiple port facilities.

WEDG verified projects are soon to be located in multiple states outside the New York-New Jersey Region. WEDG is included within development requirements promulgated by various government jurisdictions in New York, New Jersey, and Florida.

Responses to RFI Questions

10. Is there specific guidance to applicants that should be incorporated in the SGD to support the identification of benefits and impacts to Environmental Justice and Overburdened Communities, as identified in the 2019 New Jersey's Energy Master Plan and New Jersey's Environmental Justice Law, N.J.S.A. 13:1D-157?

11. How should Board Staff consider the benefits and impacts to Environmental Justice and Overburdened Communities when evaluating projects?

12. Is there specific guidance to applicants that should be incorporated in the SGD to support the dissemination of benefits to Environmental Justice and Overburdened Communities? For example, the suggestion or requirement to (1) engage with these communities on job training and supply chain opportunities, (2) define the benefits the applicant expects to provide these communities, including potentially binding or



voluntary job creation targets, and (3) explain how the applicant intends to deliver those benefits.

WEDG ensures a strong and broad set of public benefits in the communities, with a particular emphasis on threats facing overburdened communities adjacent to and connected to waterfront sites. Many of those public benefits specifically address the challenges economic and environmental challenges faced by those communities. NJBPU should require that all waterfront facilities incorporate the design strategies and performance standards identified in the [WEDG Manual](#).

Performance indicators assessed by WEDG that are particularly important to Environmental Justice and Overburdened Communities include:

- Developing and implementing an equitable plan for community engagement (Credit 0.3)
- Avoiding or reducing risk from coastal hazards, including in protecting upland areas from coastal hazards beyond the property line in areas prone to flooding (Credit 1.1)
- Providing quality public access areas on the waterfront which could include safe public access points, educational centers, and facility tours (Credit 2.1)
- Reducing industrial impacts to human health (Credit 2.2)
- Increasing transportation access to the waterfront (Credit 2.4)
- Creating maritime-related employment opportunities (Credit 2.5)
- Redeveloping and cleaning up contaminated sites (Credit 4.5)
- Reducing and managing stormwater quantity (Credit 4.6)
- Reducing contributions to urban heat (Credit 4.12)

In 2019, Waterfront Alliance partnered with the Coopers Ferry Partnership and other stakeholders in Camden, New Jersey to develop a customized version of WEDG (referred to as the "WEDG Addendum") that specifically connects to funding sources and local and state policies. The WEDG Professionals Course (an online training on WEDG) includes an extended case study of the Cramer Hill Waterfront Park which was designed to address a multitude of environmental justice concerns for the Cramer Hill neighborhood in Camden.

14. How should applicants be required to report on progress toward meeting their commitments to Environmental Justice and Overburdened Communities and engagement with these communities?

NJBPU should require that all waterfront offshore wind projects pursue formal WEDG Verification through Waterfront Alliance. Seeking WEDG Verification requires that Waterfront Alliance and a team of expert, third-party reviewers assess the project's design against the WEDG standards. Reviews occur first at the 50% design stage and



again at the 100% construction documents phase to receive WEDG Verification. NJBPU should require that offshore wind developers seek the review and provide documentation from Waterfront Alliance that each stage of the review is complete with the result. Waterfront Alliance would work with NJBPU to ensure the review process is customized as needed to include NJBPU input review milestones.

15. Are there additional specific requirements, beyond those included in the Second Solicitation's SGD, that should be considered for the economic development plan?

A significant strength of the WEDG standards is that it can be used as a tool to promote economic development. NJBPU should require that all waterfront facilities incorporate the design strategies and performance standards identified in the [WEDG Manual](#). Waterfront sites, particularly in urban areas, are some of the most valuable real estate in a community and must be developed with extreme care. Well-designed working waterfronts can provide resilience protection to adjacent communities from sea-level rise and storm surge, provide jobs, and increase property values where publicly accessible or park-like features are incorporated.

Performance indicators assessed by WEDG that promote economic development include:

- Siting or designing structures to improve visual and other sensory connections to the water (Credit 1.3)
- Supporting industrial water-dependent uses (Credit 1.4)
- Avoiding or reducing risk from coastal hazards, including in protecting upland areas from coastal hazards beyond the property line in areas prone to flooding (Credit 1.1)
- Providing quality public access areas on the waterfront which could include safe public access points, educational centers, and facility tours (Credit 2.1)
- Increasing transportation access to the waterfront (Credit 2.4)
- Creating maritime-related employment opportunities (Credit 2.5)
- Supporting diverse and sustainable maritime activity (Credit .28)
- Protecting the working waterfront edge (Credit 3.2)
- Resilient energy sources (Credit 4.7)

37. Are there additional specific requirements, beyond those included in the Second Solicitation's SGD, that should be considered for the Environmental Protection Plan?

Improving, restoring, and enhancing the ecology of a site is a central principle ingrained in WEDG. NJBPU should require that all waterfront sites incorporate the design strategies and performance standards identified in the [WEDG Manual](#).



The riparian zone (where water meets land) is a unique and delicate ecosystem and hosts significant biodiversity. Historically, many port and industrial facilities have done significant ecological damage to the riparian zone by casting shadows, deepening water, and eliminating the intertidal zone (the area that is underwater during high tide and above water at low tide). WEDG sets standards for ecological enhancements that respect the operational requirements and constraints of working waterfront sites to promote changes in design that improve site ecology without jeopardizing the function of the site.

Performance indicators assessed by WEDG that promote environmental protection include:

- Assessing site-wide social and ecological context and vulnerabilities (Credit 0.2)
- Creating a maintenance and adaptive management plan (Credit 0.3)
- Siting with ecological sensitivity (Credit 1.2)
- Choosing an appropriate edge strategy for the context and intended use (Credit 3.1)
- Maintaining or emulating natural shoreline shape and slope (Credit 3.2)
- Ecologically enhancing structural components (Credit 3.4)
- Maintaining and restoring biodiversity and ecosystem services (Credit 4.1)
- Restoring and increasing ecosystem connectivity (Credit 4.2)
- Supporting native habitat complexity and biodiversity (Credit 4.3)
- Avoiding human disturbance to natural resources (Credit 4.4)
- Utilizing sustainable fill and soil management practices (Credit 4.6)
- Using resilient and renewable energy courses (Credit 4.7)
- Practicing environmentally responsible construction (Credit 4.8)
- Improving stormwater discharge quality (Credit 4.10)
- Reducing water use (Credit 4.11)

44. What requirements for stakeholder review of mitigation and monitoring plans are reasonable and appropriate for the awarded project?

Pursuing WEDG Verification requires a detailed technical review of project designs at 50% design and 100% construction documents. Waterfront Alliance or the developer could provide the results of each review to NJBPU. Further, the MOU that each site signs prior to the beginning of the WEDG Review includes a clause related to ongoing monitoring of the site related to its performance around resilience, flooding, and maintenance for five years after construction is completed.

Closing



Requiring WEDG Verification for the development of waterfront offshore wind facilities can ensure that a diverse set of benefits are provided for communities and the environment surrounding a site.

The Waterfront Alliance team is happy to meet with NJBPU board members or staff to discuss any questions that they may have regarding WEDG and to further discuss any logistics of its inclusion in the solicitation. Our Chief Waterfront Design Officer, Joseph Sutkowi, may be your central point of contact. He can be reached at jsutkowi@waterfrontalliance.org or (212) 935-9831 x113.

Thank you for your consideration of the WEDG standards.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cortney".

Cortney Koenig Worrall
President and CEO

