



256 W. 36th Street  
11th Floor  
New York, NY 10018

212.935.9831  
waterfrontalliance.org

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December 21, 2022

Carmen Diaz  
Acting Secretary of the Board  
44 South Clinton Ave., 1<sup>st</sup> Floor  
PO Box 350  
Trenton, NJ 0865-0350

## Waterfront Alliance Comments

Dear Acting Secretary Diaz,

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 comments to the draft Solicitation Guidance Document.

Waterfront Alliance proposes an additional bullet under **3.10 Environmental Protection Plan and Emissions Impacts** as information deemed necessary by the Board in order to conduct a thorough review of the application (page 28). Please consider adding:

*"A description of any proposed resilience, sustainability, or green building certifications or rating systems including (but not limited to) WEDG® (Waterfront Edge Design Guidelines), Envision®, Green Globes®, or LEED® (Leadership in Energy and Environmental Design) that the Applicant will be pursuing on any affiliated sites."*

### The Importance of Third-Party Verification

Each of the rating systems identified in the proposed language, and other similar standards, are third-party verifications by technical experts that identify the benefits and level of achievement in the design of sites. Utilizing these standards as an influence in the design process of facilities is a signal that the site is going above and beyond minimal regulatory requirements to promote better outcomes for the environment and the surrounding community.

While sites may commit to sustainable and green building practices in public-facing language, it can be hard to independently verify the efficacy of the design and the final outcomes. Third-party verification systems are designed to set minimum performance criteria and quantify the results to provide a definitive level of achievement (e.g., LEED Platinum Certification or WEDG Verification). These rating systems bring transparency and rigor to the process.

Offshore wind developers in other states have committed to using rating systems. While this language would not require the pursuit of a particular system or even the



implementation of these types of standards at all, it would provide an opportunity for developers to share with the Board plans to build to high standards.

Waterfront Alliance submits this comment as the administrator and creator of the WEDG standard. Given its waterfront edge focus and applicability to working waterfront sites, it is particularly well-suited to the offshore wind industry. Other systems, however, do have merit and applicability to offshore wind facilities. Waterfront Alliance proposes the opportunity to disclose any of these types of certifications or rating systems in the application.

### **WEDG® (Waterfront Edge Design Guidelines)**

WEDG 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.

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. 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.



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.

### **Closing**

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](mailto:jsutkowi@waterfrontalliance.org) or (212) 935-9831 x113.

Thank you for your consideration of the WEDG standards.

Sincerely,

A handwritten signature in blue ink that reads "Cortney".

Cortney Koenig Worrall  
President and CEO

