BLUEGREEN ALLIANCE

CREATING GOOD JOBS, A CLEAN ENVIRONMENT, AND A FAIR AND THRIVING ECONOMY

October 17, 2022

Attn: Jessica Stromberg
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Office of Renewable Energy Programs
45600 Woodland Road
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**Re: Draft Environmental Impact Statement for Revolution Wind, LLC's Proposed Revolution Wind Farm Offshore Rhode Island Request for Comment [Docket BOEM-2022-0045]**

On behalf of the BlueGreen Alliance, our partners, and the millions of members and supporters they represent, we thank the U.S. Bureau of Ocean Energy Management (BOEM) for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for Revolution Wind, LLC's proposed Revolution Wind Farm ("the project") offshore Rhode Island.

The BlueGreen Alliance (BGA) unites labor unions and environmental organizations to solve today's environmental challenges in a way that creates and maintains quality jobs and builds a clean, thriving, and equitable economy. Offshore wind energy presents a once-in-a-generation opportunity to advance this mission if developed in an environmentally responsible manner, with high road labor standards and attention to environmental justice. We thank BOEM for its diligent efforts to advance offshore wind in a manner that lifts up the working class with family-sustaining union jobs, delivers benefits for communities that are hardest hit by climate change and economic inequality, and protects wildlife, critical habitat, and our nation's natural resources.

Offshore wind energy is critical to meet our nation's climate goals, particularly in New England where its technical energy resource potential is greater than all other clean energy resources combined.[1] Adding even a modest amount of offshore wind to the New England grid could drive down wholesale energy costs, especially during cold snaps and storms when ratepayers often see a sharp spike in energy prices.[2] Revolution Wind has three Power Purchase Agreements (PPAs) in place with Rhode Island and Connecticut, totaling 704 MW. Delivering the clean energy from this project successfully and on time is critical for these states to meet their clean energy goals. As BOEM works to develop a Final Environmental Impact Statement (FEIS), we urge the agency to ensure the maximum beneficial impacts are fulfilled by employing the following standards to create a high-road, responsibly developed offshore wind industry:

- Maximize the creation of quality, high-paying, union jobs over projects lifetime;
- Expand domestic manufacturing along robust domestic, regional, and local supply chains;
- Deliver community benefits with attention to improving access to disadvantaged communities;
- Protect fisheries, wildlife, and marine ecosystems by avoiding, minimizing, mitigating, and monitoring environmental impacts; and, utilizing data sharing, the best available science and data, and adaptive management strategies; and,
- Development guided by robust and inclusive stakeholder engagement, including labor organizations, Tribal nations, historically underrepresented or disadvantaged communities, low-wealth communities, communities of color, and impacted ocean users.

## Standards for a high-road, environmentally responsible industry are consistent with federal statutes

The BlueGreen Alliance believes that these standards are consistent with state and federal statutes, most notably the Outer Continental Shelf Lands Act (OCSLA) which established a pathway for renewable energy development in the Outer Continental Shelf (OCS). In Section 8 of that policy, Congress declared that it is the authority of the Secretary (delegated to BOEM) to "grant a lease, easement, or right-of-way" for activities that "produce or support production, transportation, or transmission of energy from sources other than oil and gas" in a manner that provides for:

> "(A) Safety;
> (B) Protection of the environment;
> (C) prevention of waste;
> (D) Conservation of the natural resources of the Outer Continental Shelf;
> (E) Coordination with relevant Federal agencies;
> (F) Protection of national security interests of the United States;
> (G) Protection of correlative rights in the Outer Continental Shelf;
> (H) A fair return to the United States;
> (I) Prevention of interferences with reasonable uses of the exclusive economic zone, the high seas, and the territorial seas;
> (J) Consideration of –
>
> a. The location of, and any schedule relating to, a lease, easement or right-of-way for an area of the Outer Continental Shelf; and
> b. Any other use of the sea or seabed, including use for a fishery, a sea lane, a potential site of a deep-water port, or navigation;
>
> (K) Public notice and comment on any proposal submitted for a lease, easement or right-of-way under this subsection; and
> (L) Oversight, inspection, research monitoring, and enforcement related to a lease, easement, or right-of-way under this subsection."[3]

Our standards touch on many of these imperatives including safety, protection of the environment, conservation of natural resources, protection of national security, fair return to the United States, consideration of other uses, and oversight, inspection, resource monitoring. Environmentally responsible development, robust stakeholder engagement, equitable distribution of benefits, and attention to quality job creation domestically are all critical to achieving the goals set out in the OCSLA. The Biden Administration has also reinforced in various executive orders that it is the policy of the federal government to pursue solutions to the climate crisis with attention to union labor, domestic manufacturing, environmental justice, and protection of natural resources. The announcement of the National Offshore Wind Target (NOWT) to deploy 30 gigawatts (GW) of offshore wind by 2030 further underscored this approach. In the White House Fact Sheet containing that announcement, the White House declared:

> "The President recognizes that a thriving offshore wind industry will drive new jobs and economic opportunity up and down the Atlantic Coast, in the Gulf of Mexico, and in Pacific waters. The industry will also spawn new supply chains that stretch into America's heartland, as illustrated by the 10,000 tons of domestic steel that workers in Alabama and West Virginia are supplying to a Texas shipyard where Dominion Energy is building the Nation's first Jones Act compliant turbine installation vessel.
>
> "Federal leadership, in close coordination with states and in partnership with the private sector, unions and other key stakeholders is needed to catalyze the deployment of offshore wind at scale.

> "…the Administration is taking coordinated steps to support rapid offshore wind deployment and job creation:
>
> 1. Advance ambitious wind energy projects to create good-paying, union jobs
> 2. Investing in American infrastructure to strengthen the domestic supply chain and deploy offshore wind energy
> 3. Supporting critical research and data-sharing."[4]

The White House also recently released strategies for "Advancing Equity and Racial Justice Through the Federal Government" as mandated in Executive Order 13985, including action plans for each federal department to fulfill the whole-of-government equity agenda.[5] The strategies included in the Department of Interior (DOI) action plan should be integrated in BOEM offshore wind activities and include employment opportunities for historically disadvantaged and low-wealth communities.[6] Another White House report, "Worker Organizing and Empowerment" states that union approval is at its highest since 1965, with 68% of Americans approving of labor unions.[7] Support rates increase to 74% for workers aged 18 to 24, 75% for Hispanic workers, 80% for Black workers, and 82% for Black women workers.[8] The Department of Labor's White House Task Force on Organizing and Empowerment has published guidance for how unions advance equity for underserved populations, including greater transparency around pay and higher wages, greater job security, and increased access to career pathways for women and workers of color.[9]

In addition to the authority granted to BOEM to facilitate energy development on the OCS, the president also has authority to direct requirements on leases of the OCS and precedent exists for the president to do so. Current BOEM leases of the OCS include lease terms mandated by presidential executive order (EO), specifically Executive Order 11246, which prohibits employment discrimination and establishes affirmative action requirements for nonexempt federal contractors and subcontractors.[10] Article II, § 1 of the United States Constitution provides that "executive power shall be vested in" the president. Such power gives the president the right—in the absence of an express congressional declaration to the contrary—to control the terms upon which public lands or property may be sold, leased, or used by private individuals or entities.[11] Additionally, the president has been delegated "broad-ranging authority" over governmental procurement under various laws including, for instance, the Federal Property and Administrative Services Act, 40 U.S.C. 101 et seq. which authorizes the president to "prescribe such policies and directives . . . as he shall deem necessary" for the promotion of an economical and efficient system for procurement and supply."[12] Furthermore, the DEIS references numerous Executive Orders, including President Biden's Executive Order 14008, "Tackling the Climate Crisis at Home and Abroad."

EO 14008 includes the goal of doubling offshore wind by 2030 while creating well-paying union jobs and economic growth; delivering environmental justice; an equitable, clean energy future; and ensuring robust protection for our lands, waters, and biodiversity. In this EO, President Biden also called for a whole of government approach to the climate crisis that will "create well-paying union jobs to build a modern and sustainable infrastructure." The executive order further emphasized that "[t]his Nation needs millions of construction, manufacturing, engineering, and skilled-trades workers to build a new American infrastructure and clean energy economy."[13] Specifically, EO 14008 § 204 states:

> "It is the policy of my Administration to lead the Nation's effort to combat the climate crisis by example—specifically, by aligning the management of Federal procurement and real property, public lands and waters, and financial programs to support robust climate action. By providing an immediate, clear, and stable source of product demand, increased transparency and data, and robust standards for the market, my Administration will help to catalyze private sector investment into, and accelerate the advancement of America's industrial capacity to supply, domestic clean energy, buildings, vehicles, and other necessary products and materials."[14]

In § 206, President Biden further directed all agencies to "adhere to the requirements of the Made in America Laws in making clean energy, energy efficiency, and clean energy procurement decisions" consistent with Executive Order 14005, "Ensuring the Future Is Made in All of America by All of America's Workers."[15]

President Biden's February 4, 2022 EO 14063, "Use of Project Labor Agreements for Federal Construction Projects" also demonstrates the importance of utilizing project labor agreements (PLAs) for large-scale construction projects. Specifically, EO 14063 §1b states:

> "Project labor agreements…provide structure and stability to large-scale construction projects…[and] avoid labor-related disruptions by using dispute-resolution processes to resolve worksite disputes and by prohibiting work stoppages, including strikes and lockouts. They secure the commitment of all stakeholders on a construction site that the project will proceed efficiently without unnecessary interruptions."[16]

All of these statements make clear that it is the policy of the United States to ensure that all agencies should take action to develop clean energy technologies and combat climate change while also strengthening domestic supply chains and an equitable, high-quality union workforce. To achieve this will require high road employment practices such as PLAs and domestic content requirements and incentives to be solidified into offshore wind lease contracts and permitting activities. PLA's have been proven to reduce project costs for developers, save public funds in the long run, and result in increased economic benefits for the local community.[17] In addition, PLAs often lead to safer working conditions as a result of a more skilled workforce. Data suggests that the construction industry is volatile and accidents are more common in states with low-road contractors.[18] Union firms are also 16% less likely to report difficulty in filling open positions, 13% less likely to fail in retaining skilled workers and 21% less likely to report project delays due to retention issues,[19] which is key to timely and efficient deployment during construction labor shortages. Also, reports indicate that PLAs decrease the significant gap between expected and realized energy savings in various energy efficiency measures.[20]

The utilization of domestic content in offshore wind projects is also relevant to a number of our national offshore wind goals. Securing a domestic offshore wind supply chain is essential to ensure that offshore wind projects can be deployed effectively and on time. The March 2022 offshore wind energy supply chain report by the National Renewable Energy Laboratory (NREL) states that supply chain constraints caused by global bottlenecks are one of the greatest risks for achieving the NOWT.[21] The modeling in the report also shows that average and maximum job creation utilizing 25% domestic content versus 100% domestic content in offshore wind projects results in a difference of approximately 30,000-40,000 jobs from 2023-2030.[22] In addition, across renewables, even a modest increase in manufacturing produces an additional 45,000 good manufacturing jobs per year and an additional $5 billion in wages through the 2020s, as the U.S. continues greening its electricity grid.[23] Further, domestic content requirements are unlikely to influence wind power capital costs.[24]

National security is also protected by utilizing domestic content. A jointly-commissioned summary report of the U.S. Department of Energy (DOE) and the North American Electric Reliability Corporation (NERC), assessing risks to the U.S. electricity generation and distribution infrastructure observed that the "bulk power system is dependent on long supply chains, often with non-domestic sources and links" and determined that the "increased reliance on foreign manufacturers, with critical components and essential spare parts manufactured abroad (e.g. HV transformers)" means the "supply chain itself represents an important potential vulnerability."[25] The report recommends that "efforts should be considered to bring more of the supply chain and manufacturing base for these critical assets back to North America."[26]

Utilizing domestic content in renewables also has equity implications. Data shows that decline in U.S. manufacturing has been devastating to the middle-class, especially for Black and Hispanic workers and other workers of color who disproportionately do not hold college degrees and whom experience discrimination limiting access to better-paying jobs.[27] Manufacturing wages are substantially larger for median-wage, non-college-educated employees, with Black workers in manufacturing earning 17.9% more than in non-manufacturing industries; Hispanic workers earning 17.8% more, Asian American Pacific Islander (AAPI) earning 14.3% more; and white workers earning 29% more.[28] And finally, requiring use of domestic content can help reduce the overall impact on the environment from offshore wind projects because U.S. energy intensive manufacturers are relatively clean compared to competitors. As one example, "[s]teel exporters to the US emit 50-100+% more CO2 emissions per ton than U.S. producers on average."[29] Use of domestic content can also reduce shipping distance, and thus emissions resulting from long-distance maritime transportation. The International Maritime Organization (IMO) estimates that maritime shipping generated 1 billion tons of greenhouse gasses per year from 2007-2012. Another study estimates that maritime shipping emissions are forecasted to rise between 35% and 210% by 2050. [30]

## Recommendations for the Final Environmental Impact Statement (FEIS)

*High Road Labor Standards & Domestic Supply Chain*

The DEIS estimates that the project will create between 3,856 and 4,976 full time equivalents (FTEs) depending on the alternative that is selected.[31] The Large Wind Turbine Generator (WTG) Maximum Capacity Project that would construct 73 12-MW WTGs would have the greatest beneficial job creation and economic impact potential. According to the DEIS, this scenario is expected to generate nearly $536 million in value-added production to the combined gross domestic product (GDP) of Rhode Island and Connecticut.[32] However, details regarding the job creation and economic benefits of the project are only vaguely described. The DEIS states:

> "Most of the direct construction-related jobs generated by the Proposed Action would occur in the communities where the ports used for staging and fabrication are located. Most of the direct jobs would occur during engineering and construction of onshore and offshore wind energy facilities, while most of the indirect jobs would occur during wind energy component fabrication, storage, and transport…Under the Proposed Action, construction is expected to occur within a 1-year period, but preconstruction activities such as design/engineering and component manufacturing and fabrication could lengthen the period an additional year. Where possible, local workers would be hired to meet labor needs for construction."[33]

The DEIS also states that although NREL's Jobs and Economic Development Impacts Offshore Wind Model (JEDI-OWM) cannot differentiate between economic impacts generated from onshore activities versus offshore, it can be inferred that most of the engineering and construction of both onshore and offshore facilities are included in direct jobs, while most of the component manufacturing, storage, and transport are included in the indirect jobs. Other job categories outlined in the DEIS include technician-level workers in 1) production roles, particularly high-value manufacturing positions; 2) installation and commissioning positions; 3) vessel and offshore equipment operation; and 4) commissioning and testing turbines, cables and substations.[34] BVG Associates, which outlined these occupations in their 2017 report referenced in the DEIS, notes that many of these jobs will be created in industrialized coastal areas that have suffered from economic decline in recent years.[35] The DEIS also notes that where possible, local workers would be hired to meet labor needs for project construction, operations and maintenance (O&M) and decommissioning.

We urge BOEM to provide more information on the types of jobs that will be created through this project in the FEIS, including any commitments that Revolution Wind has made to utilize domestic

content and project labor agreements. This information can supplement the NREL JEDI-OWN which doesn't contain recent developments regarding U.S. offshore wind component manufacturing and fabrication. As we described previously in this comment, maximizing the creation of manufacturing jobs across a domestic offshore wind supply chain is key for this industry to fulfill its economic benefit potential. The DEIS should contain all plans that Revolution Wind has for utilizing domestic content, be it in the New England region or elsewhere. If we can infer that indirect jobs include component manufacturing, storage, and transport, the DEIS should at a minimum provide estimates for how many jobs from each category could be expected within the estimated 1,623-2,265 indirect jobs listed in Table 3.11-9. It is imperative that the DEIS reflect accurate information regarding socioeconomic impacts of the project to ensure accountability that positive benefits are realized.

In terms of construction, Revolution Wind reported in 2021 that a PLA was reached between Ørsted, Eversource and Rhode Island Building and Construction Trades Council to transform Prov Port into a regional offshore wind hub and build an advanced foundation component facility to support the assembly of the developers projects in the Northeast.[36] Earlier this year, Ørsted and North America's Building Trades Unions (NABTU) announced a National Offshore Wind Agreement (NOWA) covering all of Ørsted's contractors and subcontractors that will construct offshore wind projects.[37] Ørsted's announcement states:

> "A first-of-its-kind in the United States, the National Offshore Wind Agreement (NOWA) sets the bar for working conditions and equity, injects hundreds of millions of dollars in middle-class wages into the American economy, creates apprenticeship and career opportunities for communities most impacted by environmental injustice, and ensures projects will be built with the safest and best-trained workers in America."[38]

These agreements have significant impacts on the quantity and quality of offshore wind careers and help ensure there is equitable access. Furthermore, they ensure there is the skilled workforce available to complete the project safely and efficiently. The DEIS notes that offshore wind projects will create a demand for workers skilled in the professions and trades needed for the design, construction, and O&M of offshore wind facilities.[39] Including information in the FEIS related to a skilled workforce and domestic supply chain is strongly aligned with federal statute as explained in the above section. Furthermore, Rhode Island recently passed legislation "Labor Standards in Renewable Energy Projects," requiring all responding bidders on renewable energy projects at 3 MW of capacity or higher valued at $5,000,000 or more to have an approved apprenticeship program for all crafts or trades with apprenticeship programs that will be employed on the project at the time of the bid.[40] Both Rhode Island and Connecticut have underscored the importance of building local and domestic supply chains to maximize job creation and economic benefit for their states. Information such as this, including but not limited to provisions in the PPA's related to labor standards, equity, supply chain, and economic development should be included in the FEIS. As the DEIS notes throughout, there are several components of the project that have not been determined yet and as such, the economic impacts cannot yet be determined. BOEM should identify these unknowns in the FEIS, including those related to supply chain and workforce contracts.

***Stakeholder engagement and environmental justice***

As mentioned, employing high labor standards has been proven to result in greater safety, access, and equity. The DEIS states, "offshore wind energy projects would support new employment and economic activity and the manufacturing sector and marine construction and transportation sectors. Some members of the environmental justice populations are expected to experience these employment income benefits, but the benefits would be no greater for environmental justice populations than those experienced by non-environmental justice populations."[41] The FEIS should indicate what actions are

planned to ensure that environmental justice populations have equitable access to these jobs and income benefits, including the use of pre-apprenticeship programs. Apprenticeship programs provide paid, on-the-job experience, making it particularly valuable in providing pathways for low-income workers into a higher skill, family-supporting careers. Estimates find that a worker who has completed an apprenticeship program will earn $300,000 more over the course of their career than non-apprenticeship participants.[42] The FEIS should consider developers plans to support programs such as Building Futures, which was launched in Rhode Island in 2007 to leverage the Registered Apprenticeship model of workforce development and prepare diverse, low-income people for success in employment as registered apprentices.[43]

The DEIS also indicates the potential for adverse impacts to environmental justice populations and Native American tribes. Community benefit agreements are one way to mitigate impacts and should be explored as an Environmental Protection Measure (EPM). All impacts to environmental justice populations and Native American tribes should also be monitored, including but not limited to the cultural resources and ancient submerged landforms that the DEIS notes could be discovered, as well as those that have already been identified. EPMs should include plans to monitor these impacts in the FEIS and include outreach to the communities where adverse impacts are anticipated. And, while it may not be required, including in the FEIS information about consultation with environmental justice populations could also support the goals of the federal statues described in the previous section.

Lastly, the DEIS references a recent survey of commercial fishing crewmembers in the northeastern U.S. that indicates that 13% of survey participants identified their race as Black, Asian, American Indian/Alaska Native or Native Hawaiian/Pacific Islander and 7% identified as Hispanic of Latino.[44] BOEM should ensure that all mitigation methods related to commercial fishing impacts, including gear loss, are conducted in an accessible manner, including but not limited to language access.

***Environmental Protection***

Environmental protection is a key requirement under the OCSLA and rigorous plans must be in place for offshore wind projects to comply with various state and federal statutes that projects are subject to. To achieve all necessary permits, offshore wind energy must be developed in an environmentally responsible manner that avoids, minimizes and mitigates impacts to marine life and ocean users, meaningfully engages stakeholders from the start, and uses the best available science and data to ensure science-based and stakeholder-informed decision making. This includes analysis of cumulative impacts and adaptive management strategies, obtaining all necessary and relevant data, and requires BOEM to identify all methodologies, and indicate when information is incomplete or unavailable, acknowledge scientific disagreement and data gaps, and evaluate intermediate adverse impacts based on approaches or methods generally accepted in the scientific community. Avoiding sensitive habitat areas, requiring strong measures to protect wildlife throughout each state of the development process, and comprehensive monitoring of wildlife and habitat before, during, and after construction, are all essential for the responsible development of offshore wind energy. The project alternative should be chosen that ensures the environment and wildlife are protected while maximizing the creation of quality, high-paying jobs and economic benefits.

***Conclusion***

When done right, offshore wind power will create thousands of high-quality, family-sustaining jobs in manufacturing, construction, operations and maintenance, and in the development of port facilities,

transmission, and other associated infrastructure while also avoiding, minimizing, and mitigating environmental impacts. Thank you for considering how BOEM might further strengthen its role in ensuring that offshore wind energy is developed responsibly, with attention to equity, maximizing quality jobs and career pathways, and protecting the environment with these additions to the FEIS. We appreciate your effort to solicit stakeholder input to inform the offshore wind energy leasing process.

Signed,

Jason Walsh

Executive Director

BlueGreen Alliance

## Endnotes

[1] For New England renewables, see: NREL, Renewable Energy Technical Potential, https://www.nrel.gov/gis/re-potential.html. For Imported hydropower, see: EER, et al., Deep Decarbonization in the Northeastern United State and Expanded Coordination with Hydro-Quebec, April 2018. Maps: Copyright © 2019 S&P Global Market Intelligence.
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[3] 43 U.S.C. § 1337(p)(4)
[4] White House, "FACT SHEET: Biden Administration Jumpstarts Offshore Wind Energy Projects to Create Jobs," March 29, 2021. Available online: https://www.whitehouse.gov/briefing-room/statements-releases/2021/03/29/fact-sheet-biden-administration-jumpstarts-offshore-wind-energy-projects-to-create-jobs/
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[30] "Calculating Maritime Shipping Emissions Per Traded Commodity," Stockholm Environment Institute (April 2019).
[31] Bureau of Ocean Energy Management, *Revolution Wind Farm and Revolution Wind Export Cable Project Draft Environmental Impact Statement,* 2022. At 3.11-26
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[33] Ibid, 3.11-26
[34] Ibid, at 3.11-13
[35] Ibid
[36] Revolution Wind, "Ørsted and Eversource Establishing Regional Offshore Wind Foundation Component Manufacturing Facility at ProvPort in Rhode Island," 2021. Available Online: https://revolution-wind.com/news/2021/04/14/16/00/regional-offshore-wind-foundation-component-manufacturing-facility-at-provport
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