March 3, 2025

U.S. Bureau of Ocean Energy Management
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240
Submitted Electronically

Re: Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Vineyard Mid-Atlantic Project on the U.S. Outer Continental Shelf Offshore New York

To the U.S. Bureau of Ocean Energy Management (BOEM):

On behalf of the BlueGreen Alliance (BGA), our partners, and the millions of members and supporters they represent, we thank you for the opportunity to comment on the notice of intent to prepare an environmental impact statement (EIS) for the Vineyard Mid-Atlantic project offshore New York.

The mission of BGA is to unify labor unions and environmental organizations into a powerful force to fight climate change, protect the health of people and the environment, stand against economic and racial inequality, and create and maintain good-paying, union jobs in communities across the country. Offshore wind is a vital clean energy solution that presents a once-in-a-generation opportunity to advance this mission if projects are developed in an equitable and environmentally responsible manner—with high-road labor standards and attention to environmental justice. Offshore wind projects have the potential to lift up the working class with family-sustaining, union jobs; deliver benefits to communities hardest hit by climate change and economic inequality; and protect wildlife and critical habitats at every stage of development.

As BOEM works to develop the EIS, we urge the agency to ensure that offshore wind achieves maximum beneficial impact by including a robust assessment of whether the project meets the following standards:

- Maximizes the creation of quality, high-paying union jobs over the project's lifetime;
- Expands U.S. manufacturing along robust domestic, regional, and local supply chains;
- Delivers community benefits with attention to improving access to systemically marginalized communities;

- Protects fisheries, wildlife, and marine ecosystems by utilizing data sharing, the best available science and data, and adaptive management strategies to avoid, minimize, mitigate, and monitor environmental impacts; and
- Solicit robust and inclusive stakeholder engagement, including labor organizations, Tribal nations, systematically marginalized communities, low-wealth communities, communities of color, and impacted ocean users.

In the following sections, we make recommendations for preparing the EIS in order to best achieve the above standards, which we believe are aligned with state and federal statute governing offshore wind development. To summarize, we strongly urge BOEM to provide greater detail related to:

- Potential employment benefits, including job training, job-quality, and accessibility;
- Strategies to avoid, mitigate, minimize, and monitor adverse impacts to communities, wildlife, and the environment;
- Data transparency regarding community engagement and oversight of monitoring activities related to pollutants associated with development; and
- Robust stakeholder engagement that includes ocean-users, communities, and all impacted Tribes that reflects their historical presence in the regions impacted by offshore wind development.

Recommendations for the EIS

National Environmental Policy Act (NEPA)

We appreciate BOEM including an analysis of socioeconomic benefits in the EIS. As part of the NEPA process, BOEM is required to review environmental, social, and economic data related to the proposed project. In NEPA, Congress declared: "It is the continuing policy of the Federal Government...to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans."[i]

To create these conditions, it is imperative that BOEM requires all offshore wind lease contracts and permitting activities ensure high-road employment practices, benefits to local communities , best management practices, and other means to ensure that projects are developed in an environmentally responsible manner and that benefits are maximized and equitably distributed. BOEM must use the best available science to avoid, minimize, mitigate, and monitor environmental and wildlife impacts.

We believe that this depth of assessment is aligned with NEPA guidance. BOEM's July 2017 study, "Evaluating Benefits of Offshore Wind Energy Projects in NEPA," states: "NEPA analyses (Environmental Assessments [EAs] or Environmental Impact Statements [EISs]) typically focus on adverse impacts to the environment. However, NEPA analyses also need to include environmental and socioeconomic benefits analyses."[ii] The study also states that benefits analyses should consider electricity system benefits, including:

- injecting power into the existing grid;
- average retail cost of power;
- evaluating system benefits from offshore wind energy production;
- environmental benefits over key periods of a project's life-cycle, including water, wetlands, biological and cultural resources, recreation and tourism, fisheries, safety, soils, land use, air quality, noise, and raw materials used for construction; and
- socioeconomic considerations.

The study describes that although NEPA does not specifically require a socioeconomic assessment, it does require an integrated use of the social sciences to assess impacts on the human environment.

These requirements should result in a thorough analysis that ensures communities, workers, and Tribes receive project benefits while also protecting said communities, wildlife, and the environment from adverse impacts. Given this scope, we urge BOEM to consider the following recommendations to fully evaluate environmental and socioeconomic impacts.

Creating accessible, high-quality union jobs

The EIS should analyze and provide information related to potential job creation as well as the potential job quality impacts and benefits associated with this development.

For all types of offshore wind jobs, BOEM should specify job categories, job numbers in each category, and potential direct, indirect, and induced jobs. The bureau should also specify gross state product and anticipated personal income. The EIS should also include an assessment of education and certifications necessary to access each job category as well as training, average wages, hours, career advancement, physical demands, and safety information. Required specialized experience that may prohibit workers in the United States from accessing these jobs should also be detailed, including the number of jobs and the type of training and experience required. The assessment should specify whether workers will need to go overseas to receive training and the duration of that training.

To maximize the creation of good jobs, BOEM should consider job quality and equity metrics in the EIS. Key principles include proactively addressing racial equity; reducing barriers to job opportunity; supporting the creation of good-paying jobs with the free and fair choice to join a union; providing opportunities for all workers—including systemically marginalized workers—to be trained and placed in good-paying jobs; utilization of project labor agreements (PLAs) and/or local hire provisions; training and placement programs for systemically marginalized workers; and adopting an equity and inclusion plan focused on procurement, material sourcing, construction, inspection, and hiring. Additionally, BOEM should require compliance with Davis-Bacon and Related Acts. Compliance with Davis Bacon should be considered a floor—contractors and subcontractors should be compelled to pay a living wage. Where relevant, The assessment should specify any commitments developers have made or secured from suppliers to ensure workers have the free and fair

choice to join a union, such as through a union neutrality agreement. This information is essential for the U.S. workforce to have equitable access to employment opportunities.These principles should be used to evaluate job quality in the offshore wind industry and inform BOEM's review of project-specific construction and operations plans.

The EIS should analyze potential benefits of high-quality job creation as well as workforce development needs associated with the development of this project. Specifically, the EIS should provide an assessment of the following categories related to job creation, job quality, and job training:

Manufacturing

Maximizing the creation of manufacturing jobs across a domestic offshore wind supply chain is key for this industry to fulfill its economic benefit potential. Supply chain constraints caused by global bottlenecks are one of the greatest risks for achieving 30 gigawatts (GW) of offshore wind by 2030.[iii]

The EIS should also include information about the material quality, standards, and certifications needed to secure a supplier contract with an offshore wind developer in the region. This information could increase access to opportunities for U.S. companies, especially minority, women, and veteran owned businesses. Finally, the EIS should contain information about the offshore wind energy components that will be manufactured outside the United States to understand the full potential of employment benefits from a mature, domestic offshore wind supply chain.

Operations and Maintenance (O&M)

The EIS should specify jobs categories related to the O&M of every aspect of offshore wind development, including the turbines, cables, and onshore and offshore substations.

Construction

This EIS should assess potential construction jobs associated with development in the lease areas, including any construction jobs anticipated to prepare ports for assembly, preparation of cable routes and interconnections, and the construction or site preparation of any manufacturing facilities.

The EIS should include a discussion of how PLAs and community workforce agreements (CWAs) will help ensure job quality and community benefits in the region. The EIS should also include up to date information about any existing PLAs or CWAs associated with the project. A PLA is an instrument to predict and control project timelines and labor costs. A PLA establishes the terms and conditions for employing workers on specific construction projects, including wages, hours, working conditions, and dispute resolution methods. These agreements can be utilized at the state and local level to ensure high-road labor

standards and timely project completion. PLAs promote safe, quality, cost-effective project delivery by providing project owners with unique access to the safest, most productive, best-trained skilled craft labor available in any given market. They can also help to ensure equitable access to jobs by including diversity, equity, and inclusion and local hire provisions. CWAs can go a step further on diversity, equity, and inclusion and are negotiated with both unions and community partners. According to the AFL-CIO, CWAs "go well beyond the traditional experience and use of PLAs to explicitly address the legitimate needs and interests of urban communities that have historically been excluded from the benefits of economic development." [iv] CWAs frequently include local hire provisions, targeted hire of low-income or systemically marginalized workers, and the creation of pre-apprenticeship pathways.

Registered apprenticeship utilization should also be documented including the types of apprenticeships—to ensure that they are union programs or U.S. Department of Labor (DOL)-certified—and the ratio of apprentices to journeymen in each program.

Training and Employment Benefits

BOEM should include an analysis of existing or potential developer strategies in the state or region for investing in workforce training programs to support offshore wind development.

Lessees should invest in training programs that are portable; accredited; have stackable credentials; include safety training standards and disaster response measures; and are industry-recognized. BOEM should also analyze opportunities for developers to invest in programs that prioritize the training of systemically marginalized and displaced workers, and provide wrap-around support services to support their enrollment. Systemically marginalized workers include workers dislocated from fossil-fuel jobs, workers of color, women, formerly incarcerated workers, workers who live in environmental justice communities, workers with disabilities, and veterans. Workforce training investments should provide the option to enter into a memorandum of understanding with community stakeholders, unions, and companies as well as other strategies to support recruitment, retention, interviews upon completion, and successful placement of graduates in apprenticeships or internships. Lessees should consult with labor unions and community groups to ensure training investments result in increased and equitable access to safe, quality jobs that will also provide more efficient operations.

Many unions run high-quality, registered workforce development programs that train participants in various trades that have transferable skills to the offshore wind industry. However, for a U.S. workforce to access opportunities in offshore wind, developers must share information about the specific skills training and certifications required as well as information about employment opportunities. This information, along with detailed

commitments to develop durable pathways for systemically marginalized workers into training and employment is invaluable.

Union-affiliated training, registered apprenticeship, and pre-apprenticeship programs—many of which offer wrap-around services to support trainees through the programs—are the premier mechanisms for building career pathways and bolster skills advancement and career development for workers. These programs can also help promote equity and fairness in the workplace by providing training and career advancement to individuals from systemically marginalized groups.

Pre-apprenticeship programs aim to ensure that workers can qualify for entry into an apprenticeship program and have the skills and support they need to succeed. These programs are generally designed to target certain populations or demographics such as low-income workers, workers of color, women, and other systemically marginalized communities. Additionally, many unions offer training throughout a member's career to enable them to stay current with the changes in technology. The most successful pre-apprenticeship programs are those affiliated with registered apprenticeships or other contractually agreed on-the-job training programs.

Apprenticeships are registered through a state apprenticeship agency or through the DOL. Registered apprenticeships are paid positions that combine on-the-job training with classroom instruction in a trade. Construction unions operate robust registered apprenticeship programs while industrial unions work with employers on joint labor management training programs that also provide a combination of classroom and on-the job skills training. When these programs are paired with recruitment strategies— such as partnering with a community group to provide information about workforce and training opportunities and providing wrap-around services—the benefits can be even greater. Many examples of programs providing such services can be found in AFl-CIO resources.[v]

BOEM should also analyze language barriers for local communities to access job benefits and consider how to address their needs. Demographics such as language or education should be considered to ensure jobs and training are accessible to a diverse workforce. Any agreements that developers have made to increase access—to jobs in manufacturing, O&M, construction, or otherwise—should be detailed to increase transparency and the local community's ability to access these resources and benefits.

Ensuring Environmental Justice

BOEM should analyze how project development can ensure that local communities and Tribes receive the maximum possible benefits.
For example, community benefits agreements (CBA) are an important way to ensure that projects provide real and meaningful community benefits. CBAs can be expansive in scope

and are often negotiated with both union and community partners. Because they are legally binding agreements, they provide a higher level of accountability and enforceability and can therefore help ensure that specific workforce and community benefits are provided. CBAs can ensure that developers are held accountable for providing the benefits they promise, and that community groups have a say in the development process. Local hire provisions, often included in CBAs, are another important tool to support the hiring of workers from within the state or local community. Without this provision, work crews from out of state can be brought in, minimizing the job creation benefits for the local community. BOEM should analyze the benefits of requests made by local communities, such as requests for CBAs or community governance of the offshore wind project.

BOEM should detail information related to air and water quality impacts associated with potential manufacturing, port activities, construction, and ongoing O&M. It should also include analysis of the benefits of community consultation related to adverse impacts and methods for continued community engagement around the oversight, monitoring, and structuring of mitigation plans, including adaptive management strategies. BOEM should analyze the impacts from conducting appropriate benthic surveys of cable routes and other activities that may exacerbate existing contamination from urban and storm runoff, industry, or historic use of the site. Pre-construction, construction, and post-construction monitoring should be conducted, especially in areas of known vulnerability such as those adjacent to sources of contaminants or near environmental justice communities.

BOEM should analyze the extent of Tribal consultation needed. In line with the lease stipulations, developers must ensure that all impacted Tribes are properly consulted, including state-recognized Tribes and non-federally recognized Tribes that is representative of their historical presence in the region.

Environmental Protection

Environmental protection is a key requirement under the Outer Continental Shelf Lands Act (OCSLA) and NEPA. Rigorous plans must be in place for offshore wind projects to comply with the various state and federal statutes they are subject to. 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. The EIS should analyze potential cumulative impacts, benefits of mitigation measures, and adaptive management strategies. The analysis should include all relevant data and acknowledge relevant scientific disagreements and data gaps. 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. A combination of alternatives should be

chosen to ensure communities, wildlife, and the environment are protected while maximizing the creation of quality, high-paying jobs, and economic benefits.

High-road, Equitable, Environmentally Responsible Development

Outer Continental Shelf Lands Act (OCSLA)

BGA believes that standards for high-road, equitable, and environmentally responsible development are consistent with federal statute. In Section 8 of OCSLA, Congress declared that it is the authority of the Secretary of the Interior (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."[vi]

High road 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, and resource monitoring. Environmentally responsible development, robust stakeholder engagement, equitable distribution of benefits, and attention to quality, domestic job creation are all foundational to OCSLA requirements.

Utilizing Domestic Content Maximizes Benefits and Supports National Security

The federal government can support strong domestic energy generation as well as job creation and increased domestic manufacturing through supporting responsible offshore wind development. The utilization of domestic content in offshore wind projects is imperative for building out the offshore wind industry and providing needed domestic energy to communities across the country. The March 2022 offshore wind energy supply chain report by the National Renewable Energy Laboratory states that supply chain constraints caused by global bottlenecks are one of the greatest risks for achieving our national offshore wind goals.[vii] 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.[viii] In addition, across solar and wind energy, even a 10% increase in domestic manufacturing can produce an additional 45,000 jobs per year through the 2020s without substantially increasing the cost of the projects.[ix]

Our national security is strongly tied to our energy security, to which domestic manufacturing plays a critical role. The U.S. Department of Energy and the North American Electric Reliability Corporation jointly-commissioned a report assessing risks to the U.S. electricity generation and distribution infrastructure. The summary of the report 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."[x] 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."[xi]

Strengthening the nation's supply chains can result in environmental benefits as well. Energy intensive manufacturers in the United States are relatively clean compared to competitors. As one example, "[s]teel exporters to the U.S. emit 50-100+% more CO_2 emissions per ton than U.S. producers on average."[xii] Use of domestic content can also reduce shipping distance, and thus emissions resulting from long-distance maritime transportation. The International Maritime Organization estimates that maritime shipping generated 1 billion tons of greenhouse gases per year from 2007-2012. Another study estimates that maritime shipping emissions are forecasted to rise between 35% and 210% by 2050. [xiii]

Supporting U.S. manufacturing also has equity implications. Data shows that the 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 who experience discrimination limiting access to better-paying jobs.[xiv] Manufacturing wages are substantially larger than in non-manufacturing industries for median-wage, non-college-educated employees, with Black workers in manufacturing earning 17.9% more; Hispanic workers earning 17.8% more; Asian American Pacific Islander (AAPI) earning 14.3% more; and white workers earning 29% more.[xv]

Union Labor Benefits Workers and Projects

The Bureau of Labor Statistics reports that non-union workers earn just 85% of what unionized workers earn.[xvi] Union approval is at its highest since 1965, with 68% approving of labor unions and even higher support among young people.[xvii] The report also contains guidance for how unions advance equity for systemically marginalized populations, including greater transparency around pay and higher wages, greater job security, and increased access to career pathways for women and workers of color.[xviii] PLAs are a proven way to ensure workers in the construction sector have access to the benefits and protections of unions.

PLAs have been demonstrated to reduce project costs for developers, save public funds in the long run, and produce increased economic benefits for the local community.[xix] In addition, PLAs often lead to safer working conditions as a result of the more skilled workforce that union training programs provide.[xx] A 2021 Canadian study found that unionization in institutional, commercial, and industrial construction, maintenance, and repair work was associated with a 25% lower lost-time injury rate, 23% lower incidence of musculoskeletal lost-time injury claims, and 16% lower incidence of critical lost time injury claims.[xxi] Data also suggests that accidents in the construction industry are more common in states with low-road contractors.[xxii] 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, which is key to timely and efficient deployment during construction labor shortages. [xxiii] Because PLAs often include provisions around apprenticeship utilization and recruitment of women, people of color, veterans, and other systemically marginalized workers, they also contribute to more equitable career pathways for a diverse workforce. These points are important to consider as BOEM undertakes the NEPA review process.

Conclusion

When done right, offshore wind power will create thousands of high-quality, family-sustaining jobs in manufacturing, construction, and O&M 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 by maximizing quality jobs and career pathways, protecting the environment, and with attention to equity by including our recommendations in a robust EIS. We appreciate your effort to solicit stakeholder input to inform the offshore wind energy leasing process.

Signed,

Jason Walsh

Executive Director

BlueGreen Alliance

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[i] National Environmental Policy Act (NEPA) 42 U.S.C. §§ 4321 (1970)

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[iii] National Renewable Energy Laboratory (NREL), The Demand for a Domestic Offshore Wind Energy Supply Chain, January 2022. https://www.nrel.gov/docs/fy22osti/81602.pdf.

[iv] AFL-CIO. "Community Workforce Agreements: The Pathway to Coalitions Between Labor and Community. Prepared by Emerald Cities Planning Committee Building and Construction Trades Department (AFL-CIO)," March 26, 2010. https://emeraldcities.org/wp-content/uploads/2023/05/Copy-of-community-workforce-agree.pdf.

[v] AFL-CIO https://aflcio.org/issues/better-pay-and-benefits/apprenticeships

[vi] U.S. Code, § 1337 - Leases, easements, and rights-of-way on the outer Continental Shelf. https://www.law.cornell.edu/uscode/text/43/1337

[vii]NREL, The Demand for a Domestic Offshore Wind Energy Supply Chain, January 2022. https://www.nrel.gov/docs/fy22osti/81602.pdf.

[viii] Ibid.

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[xv] Ibid.

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